BOSTON CONNECTICUT FLORIDA NEW JERSEY NEW YORK WASHINGTON, DC

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November 17, 2020

### Via Electronic Mail<sup>1</sup>

Aida Camacho-Welch Secretary of the Board New Jersey Board of Public Utilities 44 S. Clinton Avenue Trenton, NJ 08625

Re: I/M/O The Application of PSEG Nuclear, LLC and Exelon Generation Company, LLC

for the Zero Emission Certificate Program - Salem Unit 1 Docket No. ER20080557

I/M/O The Application of PSEG Nuclear, LLC and Exelon Generation Company, LLC for the Zero Emission Certificate Program - Salem Unit 2 Docket No. ER20080558

Dear Ms. Camacho-Welch:

Enclosed please find a motion for admission *pro hac vice* of Alexander Judd, and supporting affidavits, for the two above-referenced proceedings.

If you have any questions about this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/ Naju R. Lathia

Naju R. Lathia Counsel to Exelon Generation Company, LLC

Enclosures

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<sup>&</sup>lt;sup>1</sup> Pursuant to the Order issued by the Board of Public Utilities dated March 19, 2020, service of these documents is in electronic format only

## BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Application of PSEG	)	
Nuclear, LLC and Exelon Generation	)	Docket No. ER20080557
Company, LLC for the Zero Emission	)	
Certificate Program - Salem Unit 1	)	
	)	
In the Matter of The Application of PSEG	)	Docket No. ER20080558
Nuclear, LLC and Exelon Generation	)	
Company, LLC for the Zero Emission	)	
Certificate Program - Salem Unit 2	)	

#### MOTION FOR ADMISSION PRO HAC VICE

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The undersigned counsel, a member in good standing of the bar of the State of New Jersey and serving as attorney of record in this proceeding, hereby moves for the admission *pro hac vice* of Alexander Judd, Esq. Mr. Judd is a member in good standing of the bar of Connecticut. There is good cause for Mr. Judd to be admitted *pro hac vice* because he has significant experience representing the interests of energy companies, and this proceeding involves a complex field of law in which he is a specialist. As evidenced by his certification attached hereto, if this motion is granted, Mr. Judd will pay the fees to the New Jersey Lawyers' Fund for Client Protection pursuant to R. 1:20-1(b) and the Lawyers Assistance Program pursuant to R. 1:28B-1(e).

Respectfully submitted,

/s/ Naju R. Lathia

Naju R. Lathia

NJ Bar #: 902782012

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### BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Application of PSEG	)	
Nuclear, LLC and Exelon Generation	)	Docket No. ER20080557
Company, LLC for the Zero Emission	)	
Certificate Program - Salem Unit 1	)	
	)	
In the Matter of The Application of PSEG	)	Docket No. ER20080558
Nuclear, LLC and Exelon Generation	)	
Company, LLC for the Zero Emission	)	
Certificate Program - Salem Unit 2	)	

# CERTIFICATION IN SUPPORT OF REQUEST TO APPEAR PRO HAC VICE

County of Essex	)	
	)	SS
State of New Jersey	)	

- I, Naju Lathia, duly sworn according to law, certify and say:
  - 1. I am an attorney-at-law of the State of New Jersey and a Senior Associate of the firm of Day Pitney LLP, attorneys for Exelon Generation Company, LLC ("Exelon Generation") in this matter. As such, I am fully familiar with the facts and circumstances herein.
  - I submit this Certification in Support of the motion for an Order pursuant to R.
     1:21-2 admitting Alexander Judd to appear and participate in the instant matter *pro hac vice*.
  - 3. As set forth in his Certification submitted in support of this motion, Alexander Judd is a Senior Associate at Day Pitney LLP and a member in good standing of the bar of the State of Connecticut.
  - 4. Exelon Generation has requested that Alexander Judd be permitted to assist Day Pitney LLP in representing Exelon Generation in this matter. It is my understanding that

Alexander Judd has a preexisting relationship with Exelon Generation and serves as its

counsel. As such, Alexander Judd has particular knowledge and experience in advocating

on behalf of Exelon Generation's interests.

5. Day Pitney LLP is qualified to practice law in the State of New Jersey pursuant to

R. 1:21-1. Pursuant to R. 1:21-2, Day Pitney LLP will sign, and be responsible for, all

filings made with the Board of Public Utilities. Day Pitney LLP will also be responsible

for the conduct of this matter and of Alexander Judd.

6. Accordingly, I respectfully request that the Board of Public Utilities grant this

motion to admit Alexander Judd to appear and participate in the instant matter pro hac

vice.

I certify that the foregoing statements made by me are true. I am aware that if any

of the foregoing statements are willfully false, I am subject to punishment.

1/aju R. Lathia

Dated: November 17, 2020

### BEFORE THE NEW JERSEY BOARD OF PUBLIC UTILITIES

In the Matter of the Application of PSEG	)	
Nuclear, LLC and Exelon Generation	)	Docket No. ER20080557
Company, LLC for the Zero Emission	)	
Certificate Program - Salem Unit 1	)	
	)	
In the Matter of The Application of PSEG	)	Docket No. ER20080558
Nuclear, LLC and Exelon Generation	)	
Company, LLC for the Zero Emission	)	
Certificate Program - Salem Unit 2	)	

# CERTIFICATION IN SUPPORT OF REQUEST TO APPEAR PRO HAC VICE

County of Hartford	)
)	SS.
State of Connecticut	)

- I, Alexander Judd, duly sworn according to law, certify and say:
  - 1. I make this Certification in support of the Motion of Exelon Generation Company, LLC ("Exelon Generation") for an Order admitting me to appear and participate in the instant matter pro hac vice on behalf of same. The facts and circumstances set forth herein are based on my personal knowledge.
  - 2. I am a 2008 graduate of The George Washington University and I graduated from the University of Connecticut School of Law in 2012.
  - 3. I am a Senior Associate at the firm of Day Pitney LLP having offices at 242 Trumbull Street, Hartford, Connecticut.
  - 4. I was admitted in as a member of the Bar of the State of Connecticut in 2012, and am an attorney in good standing admitted to practice law in the State of Connecticut. I am not admitted to practice in New Jersey. I have no disciplinary proceedings pending against

me in any jurisdiction and no discipline has been previously imposed on me in any jurisdiction.

- 5. I am associated in this matter with New Jersey counsel of record, Naju R. Lathia, Esq., of Day Pitney LLP. Day Pitney LLP is qualified to practice law in this State pursuant to R. 1:21-1.
- 6. Exelon Generation has requested my representation in this matter. I have a preexisting relationship with Exelon Generation and serve as counsel. As such I have particular knowledge and experience in connection with Exelon Generation's operations and legal requirements.
- 7. There is good cause for my admission *pro hac vice* in that I have had considerable experience representing energy and utility companies in various proceedings before state public service commissions. The proceeding in which I seek admission involves a complex field of law in which I am a specialist.
- 8. If this motion is granted, I will pay the New Jersey Lawyers' Fund for Client Protection the fees required by R. 1:20-1(b) and the Lawyers Assistance Program required by R. 1:28B-1(e) promptly after this motion has been granted.
- 9. If this motion is granted, I agree to:
  - a) abide by the New Jersey Court Rules, including all disciplinary rules;
  - b) consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter;
  - c) notify the Board of Public Utilities immediately of any matter affecting my standing at the bar of any court; and
  - d) have all pleadings, briefs and other papers filed with the Board of Public Utilities signed by the attorney of record.

10 Ju

Alexander Judd

Dated: November 17, 2020

### **CERTIFICATE OF SERVICE**

I hereby certify that I caused to be served via email the foregoing documents upon each person designated on the official service lists compiled by the Secretary in these proceedings. I hereby certify that the foregoing statement made by me is true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated this 17th day of November, 2020.

By: /s/ Naju R. Lathia

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