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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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NAJU R. LATHIA
Attorney at Law

One Jefferson Road
Parsippany, NJ 07054-2891
T: (973) 966-8082 F: (973) 206-5804
nlathia@daypitney.com

December 19, 2018

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

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Via Overnight Delivery and E-Mail

Re: In the Matter of the Implementation of L. 2018, c.16 Regarding the Establishment of a
Zero Emission Certificate Program for Eligible Nuclear Power Plants -NJ
BPU Docket No. EO18080899

Application for Zero Emissions Certificates of Salem 1 Nuclear Power Plant
BPU Docket No. _____

Application for Zero Emissions Certificates of Salem 2 Nuclear Power Plant
BPU Docket No. EO18121339

Dear Ms. Camacho-Welch:

Enclosed please find two motions for admission *pro hac vice* and supporting affidavits for Jeanne J. Dworetzky for the two above-referenced proceedings (Application for Zero Emissions Certificates of Salem 1 Nuclear Power Plant and Application for Zero Emissions Certificates of Salem 2 Nuclear Power Plant). Originals and 10 copies of the motions and supporting affidavits are included herein.

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

- CMS*
T. Walker
- Stacy Peterson
 - Stacy Richardson
 - Bethany Romaine
 - Ben Witherell
 - Charlie Gurkas
 - Cindy Bianco
 - Paul Flanagan
 - Kevin Nedza
 - Noreen Giblin
 - Grace Power

Regards,

/s/ Naju R. Lathia

Naju R. Lathia
Counsel to Exelon Generation Company, LLC

Enclosures

Thanks - Tom

g. Hart
P. Krogman

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

BEFORE THE NEW JERSEY
BOARD OF PUBLIC UTILITIES

IN THE MATTER OF THE)
IMPLEMENTATION)
OF L. 2018, c. 16 REGARDING THE)
ESTABLISHMENT OF A ZERO EMISSION)
CERTIFICATE PROGRAM FOR ELIGIBLE)
NUCLEAR POWER PLANTS)

APPLICATION FOR ZERO EMISSIONS)
CERTIFICATES OF SALEM 2 NUCLEAR)
POWER PLANT)

Docket No.: EO18080899

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

Docket No. EO18121339

MOTION FOR ADMISSION *PRO HAC VICE*

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 Jeanne J. Dworetzky, Esq. Ms. Dworetzky is a member in good standing of the bars of the Commonwealth of Pennsylvania and the District of Columbia. There is good cause for Ms. Dworetzky to be admitted *pro hac vice* because she has significant experience representing the interests of energy companies, and this proceeding involves a complex field of law in which she is a specialist. As evidenced by her affidavit attached hereto, Ms. Dworetzky has paid the fees to the NJ Lawyers' Fund for Client Protection pursuant to R. 1:20-1(b).

Respectfully submitted,

/s/ Naju R. Lathia

Naju R. Lathia

NJ Bar #: 902782012

Day Pitney LLP

One Jefferson Road

Parsippany, NJ 07054

T: (973) 966 8082

F: (973) 206 5804

nlathia@daypitney.com

**BEFORE THE NEW JERSEY
BOARD OF PUBLIC UTILITIES**

IN THE MATTER OF THE)
IMPLEMENTATION)
OF L. 2018, c. 16 REGARDING THE)
ESTABLISHMENT OF A ZERO EMISSION)
CERTIFICATE PROGRAM FOR ELIGIBLE)
NUCLEAR POWER PLANTS)

Docket No.: EO18080899

APPLICATION FOR ZERO EMISSIONS)
CERTIFICATES OF SALEM 2 NUCLEAR)
POWER PLANT)

Docket No. _____

**AFFIDAVIT IN SUPPORT OF REQUEST
TO APPEAR *PRO HAC VICE***

Washington)
) ss.
D.C.)

I, Jeanne J. Dworetzky, duly sworn according to law, depose and say:

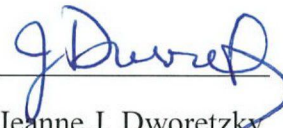
1. I am an attorney in good standing admitted to practice law in the Commonwealth of Pennsylvania and the District of Columbia. I am not admitted to practice in New Jersey. I have no disciplinary proceedings pending against me in any jurisdiction and no discipline has been previously imposed on me in any jurisdiction.
2. I am associated in this matter with New Jersey counsel of record, Naju R. Lathia, who is qualified to practice law in this State pursuant to R. 1:21-1.
3. My employer, Exelon Generation Company, LLC ("Exelon"), has requested my representation in this matter.
4. There is good cause for my admission *pro hac vice* in that I have had considerable experience representing Exelon in various proceedings before the Federal Energy Regulatory Commission and state public service commissions, and I am an attorney with

Exelon. The proceeding in which I seek admission involves a complex field of law in which I am a specialist.

5. I have paid to 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).

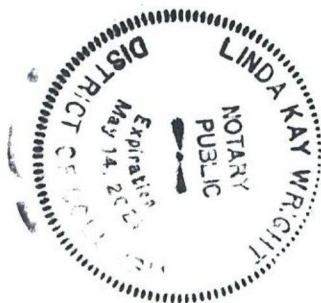
6. If this application to appear *pro hac vice* is granted, I agree to:

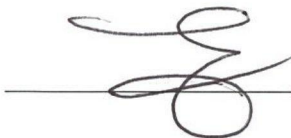
- a) abide by the New Jersey Court Rules, including all disciplinary rules;
- b) consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my company that may arise out of my participation in this matter;
- c) notify the 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.


Jeanne J. Dworetzky

District of Columbia: ss

Signed and sworn to before me on this 19 day of December, 2018, by Jeanne J. Dworetzky.





My Commission Expires:

May 14, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing documents upon each person designated on the official service list for Docket No. EO18080899.

Dated this 19th day of December, 2018.

By: /s/ James B. Blackburn IV

James B. Blackburn IV
Day Pitney LLP
1100 New York Avenue NW
Washington, DC 20005
Ph: 202-218-3905
JBlackburn@daypitney.com