

**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

**IN THE MATTER OF THE PETITION :  
OF ATLANTIC CITY ELECTRIC :  
COMPANY FOR APPROVAL OF THE : BPU DOCKET NO. EO20080541  
SMART ENERGY NETWORK :  
PROGRAM AND COST RECOVERY :  
MECHANISM AND OTHER RELATED :  
RELIEF :**

---

**MOTION FOR ADMISSION *PRO HAC VICE***

---

Intervenors, NRG Energy, Inc. (“NRG”), Direct Energy Business, LLC (“Direct Business”), Direct Energy Business Marketing, LLC (“Direct Marketing”), Direct Energy Services, LLC (“Direct Services”), and Gateway Energy Services Corporation (“Gateway”), (collectively, “Direct Energy”), and Centrica Business Solutions (collectively, the “Market Participants”) respectfully files this Motion for Admission *Pro Hac Vice* of Karen O. Moury, Esq. and Sarah C. Stoner, Esq. with the New Jersey Board of Public Utilities (“Board” or “BPU”). In support of its motion, the Market Participants shall rely upon the Certification of Christopher E. Torkelson, Esq., and the Affidavits of Karen O. Moury, Esq. and Sarah C. Stoner, Esq., filed and served herewith.

**ECKERT SEAMANS CHERIN &  
MELLOTT, LLC**

*Attorneys for Intervenors NRG Energy, Inc., Direct Energy Business, LLC, Direct Energy Business Marketing, LLC, Direct Energy Services, LLC, Gateway Energy Services Corporation, and Centrica Business Solutions*

By: \_\_\_\_\_

  
Christopher E. Torkelson

Dated: October 14, 2020

**CERTIFICATION OF SERVICE**

I hereby certify that on this date an electronic copy of the foregoing Motion to Intervene were served on all parties set forth on the attached service list.



---

Christopher E. Torkelson

Dated: October 14, 2020

**IN THE MATTER OF THE PETITION OF ATLANTIC CITY ELECTRIC COMPANY FOR  
APPROVAL OF THE SMART ENERGY NETWORK PROGRAM AND COST RECOVERY  
MECHANISM AND OTHER RELATED RELIEF  
BPU DOCKET NO. EO20080541**

**SERVICE LIST**

<p><b><u>Atlantic City Electric Company</u></b> 500 North Wakefield Drive P.O. Box 6066 Newark, DE 19714-6066</p> <p>Philip J. Passanante, Esq. <a href="mailto:philip.passanante@pepcoholdings.com">philip.passanante@pepcoholdings.com</a></p> <p>Heather Hall <a href="mailto:heather.hall@pepcoholdings.com">heather.hall@pepcoholdings.com</a></p> <p><b><u>Division of Rate Counsel</u></b> 140 East Front Street, 4<sup>th</sup> Floor Post Office Box 003 Trenton, NJ 08625-0003</p> <p>Stefanie A. Brand, Esq., Director <a href="mailto:sbrand@rpa.nj.gov">sbrand@rpa.nj.gov</a></p> <p>Brian Lipman, Esq. <a href="mailto:blipman@rpa.nj.gov">blipman@rpa.nj.gov</a></p> <p>Ami Morita, Esq. <a href="mailto:amorita@rpa.nj.gov">amorita@rpa.nj.gov</a></p> <p>David Wand, Esq. <a href="mailto:dwand@rpa.nj.gov">dwand@rpa.nj.gov</a></p> <p>Christine Juarez, Esq. <a href="mailto:cjuarez@rpa.nj.gov">cjuarez@rpa.nj.gov</a></p> <p>Robert Glover, Esq. <a href="mailto:rglover@rpa.nj.gov">rglover@rpa.nj.gov</a></p> <p>Maria Novas-Ruiz, Esq. <a href="mailto:mnovas-ruiz@rpa.nj.gov">mnovas-ruiz@rpa.nj.gov</a></p>	<p><b><u>Board of Public Utilities</u></b> 44 South Clinton Avenue, 9<sup>th</sup> Floor Post Office Box 350 Trenton, NJ 08625-0350</p> <p>Aida Camacho-Welch, Board Secretary <a href="mailto:board.secretary@bpu.nj.gov">board.secretary@bpu.nj.gov</a></p> <p>Paul Flanagan, Esq., Executive Director <a href="mailto:paul.flanagan@bpu.nj.gov">paul.flanagan@bpu.nj.gov</a></p> <p>Robert Brabston, Esq., Deputy Executive Director <a href="mailto:Robert.brabston@bpu.nj.gov">Robert.brabston@bpu.nj.gov</a></p> <p>Christine Sadovy, Chief of Staff <a href="mailto:Christine.sadovy@bpu.nj.gov">Christine.sadovy@bpu.nj.gov</a></p> <p><b><u>Office of the Chief Counsel</u></b></p> <p>Abe Silverman, Esq., Chief Counsel <a href="mailto:abe.silverman@bpu.nj.gov">abe.silverman@bpu.nj.gov</a></p> <p>Heather Weisband, Esq. <a href="mailto:heather.weisband@bpu.nj.gov">heather.weisband@bpu.nj.gov</a></p> <p><b><u>Division of Energy</u></b></p> <p>Stacy Peterson, Director <a href="mailto:stacy.peterson@bpu.nj.gov">stacy.peterson@bpu.nj.gov</a></p> <p>Paul Lupo <a href="mailto:paul.lupo@bpu.nj.gov">paul.lupo@bpu.nj.gov</a></p> <p>Bart Kilar <a href="mailto:bart.kilar@bpu.nj.gov">bart.kilar@bpu.nj.gov</a></p> <p>Christopher Oprysk <a href="mailto:christopher.oprysk@bpu.nj.gov">christopher.oprysk@bpu.nj.gov</a></p> <p>Sri Medicherla <a href="mailto:sri.medicherla@bpu.nj.gov">sri.medicherla@bpu.nj.gov</a></p>
---	--

<p>Department of Law and Public Safety Richard J. Hughes Justice Complex Public Utilities Section 25 Market Street, P.O. Box 112 Trenton, NJ 08625</p> <p>Daren Eppley, DAG <a href="mailto:daren.eppley@law.njoag.gov">daren.eppley@law.njoag.gov</a></p> <p>Pamela L. Owen, DAG <a href="mailto:pamela.owen@law.njoag.gov">pamela.owen@law.njoag.gov</a></p> <p>Michael Beck, DAG <a href="mailto:michael.beck@law.njoag.gov">michael.beck@law.njoag.gov</a></p> <p>Brandon Simmons, DAG <a href="mailto:brandon.simmons@law.njoag.gov">brandon.simmons@law.njoag.gov</a></p>	
---	--