

**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 :**

**CERTIFICATION OF CHRISTOPHER E. TORKELSON, ESQ.
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

I, **CHRISTOPHER E. TORKELSON**, of full age, certify as follows:

1. I am an attorney-at-law admitted to practice in the State of New Jersey and a member of the law firm of Eckert Seamans Cherin & Mellott, LLC (“Eckert Seamans”), attorneys for 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”). I am a member in good standing of the Bar of the State of New Jersey and qualified to practice pursuant to R. 1:21-1.

2. I am familiar with all of the facts and circumstances herein. I make this Certification in support of the applications of the following attorneys of the law firm of Eckert Seamans Cherin & Mellott, LLC to appear *pro hac vice* on behalf of the Market Participants: Karen O. Moury, Esq., a member, and Sarah C. Stoner, Esq., an associate. I will be associated with these attorneys in the handling of this matter in accordance with R. 1:21-2(a)(1)(B).

3. Ms. Moury and Ms. Stoner are attorneys practicing with the law firm of Eckert Seamans Cherin & Mellott, LLC in its Harrisburg office, located at 213 Market Street, 8th Floor, Harrisburg, PA 17101.

4. Ms. Moury is a member in good standing of the Bar of the Commonwealth of Pennsylvania, having been admitted there in 1982. Ms. Stoner is a member in good standing of the Bar of the Commonwealth of Pennsylvania, having been admitted there in 2013. Ms. Moury and Ms. Stoner are not now and have never been under any suspension or disbarment by the bar of any Court, and there are no disciplinary proceedings pending against them.

5. For purposes of this litigation, Ms. Moury and Ms. Stoner will be associated with me, New Jersey counsel of record for the Market Participants, in accordance with R. 1:21-1. I will continue to serve as counsel of record for the Market Participants and will ensure that Ms. Moury and Ms. Stoner comply with the New Jersey Rules of Court regarding *pro hac vice* admission, including the requirements of R. 1:20-1(b), 1:21-2(b) and 1:28-2.

6. Ms. Moury and Ms. Stoner have a long-standing attorney-client relationship with the Market Participants and have substantial experience representing the interests of retail energy providers in regulatory and administrative proceedings. This proceeding, initiated by a Petition filed by Atlantic City Electric Company (“ACE”) involves a complex field of law in which Ms. Moury and Ms. Stoner are specialists. Consequently, the participation of Ms. Moury and Ms. Stoner in this litigation would substantially facilitate the representation of the Market Participants.

7. There is good cause for the *pro hac vice* admission of Ms. Moury and Ms. Stoner as they are fully familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by their acting as attorneys for the Market Participants in this matter.

8. In further support of this application, the Market Participants will rely upon the Affidavits of Karen O. Moury, Esq. and Sarah C. Stoner, Esq., submitted herewith.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Christopher E. Torkelson, Esq.

Dated: October 14, 2020