

**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 :**

**AFFIDAVIT OF KAREN O. MOURY, ESQ. IN SUPPORT
OF MOTION FOR ADMISSION *PRO HAC VICE***

Harrisburg)
) ss:
Pennsylvania)

I, **KAREN O. MOURY**, duly sworn according to law, depose and say:

1. I am an attorney-at-law in the Commonwealth of Pennsylvania and a member in the Harrisburg, Pennsylvania office of Eckert Seamans Cherin & Mellott, LLC (“Eckert Seamans”), counsel for 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”). I am personally familiar with the facts set forth herein and authorized to make this affidavit, pursuant to R. 1:21-2, in support of my application to be admitted *pro hac vice* before the New Jersey Board of Public Utilities (“Board” or “BPU”).

2. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania, having been admitted to that bar in 1982. I am not now and have never been under any suspension or disbarment by the Bar of any Courts and there are no disciplinary proceedings pending against

{R0640894.1}

me. During the pendency of this action, I will notify the Board of any change in standing with the Bar of any other court, and notify the Board immediately if any actions are instituted against me in affecting my standing with the Bar of any state. I am domiciled and principally practice law in the Commonwealth of Pennsylvania.

3. I am associated in this matter with New Jersey counsel of record, Christopher E. Torkelson, Esq., an attorney in the Princeton, New Jersey office of Eckert Seamans. I am advised that Mr. Torkelson is a member in good standing of the Bar of the State of New Jersey and is qualified to practice pursuant to R. 1:21-1.

4. I respectfully submit that good cause exists for my admission *pro hac vice*. I have been requested by the Market Participants, with whom my firm has a long-standing attorney-client relationship, to represent them in this matter. I have a long-standing attorney-client relationship with all of 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 I am a specialist. Consequently, my participation in this litigation would substantially facilitate the representation of the Market Participants. I am fully familiar with the facts and circumstances surrounding this case. My work in connection with this representation will assist in the handling of this matter.

5. As a condition of my admission, I agree to be bound by and comply with the requirements of all applicable rules, including the requirements of R. 1:20-1(b), R. 1:21-2 and R. 1:28-2, and to pay all fees as required by these rules. I will remain current as required by the within cited rules.

{R0640894.1}

6. I shall make sure that all pleadings, briefs and other papers filed with the Board shall be signed and filed by an attorney of record who is authorized to practice before the Board.

7. Based upon the foregoing, I respectfully request that I be admitted *pro hac vice* to participate in this action.

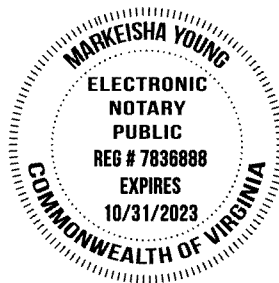
Karen O. Moury

Karen O. Moury, Esq.

SUBSCRIBED AND SWORN before
me this 14 day of October, 2020

Markeisha Young

Notary Public



Commonwealth of Virginia
City/County of HENRICO

On 10/14/2020, before me, MARKEISHA YOUNG, personally appeared, KAREN O. MOURY, proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s) or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal

Markeisha Young

My commission expires, OCTOBER 31 2023