## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public Utilities on its own Motion into Bay State Gas Company d/b/a Columbia Gas of Massachusetts' responsibility for and response to the September 13, 2018 Merrimack Valley D.P.U. 19-140 Incident, pursuant to 49 U.S.C. § 60105, G.L. c. 164, § 76, G.L. c. 164, § 105A, and 220 CMR 69.00. Investigation by the Department of Public Utilities on its own Motion into the Preparation and Response of Bay State Gas Company d/b/a Columbia Gas of Massachusetts with respect to the September 13, 2018 Merrimack Valley D.P.U. 19-141 Gas Event pursuant to G.L. c. 164, §§ 1J, 76, and 85B, and 220 CMR 19.00.

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

The undersigned counsel for Conservation Law Foundation ("CLF"), Johannes Epke respectfully moves for admission *pro hac vice* in the above-captioned proceedings before the Department of Public Utilities ("the Department"). In support of this motion, Mr. Epke states as follows:

1. Mr. Epke is a staff attorney with the Conservation Law Foundation. His business address is 62 Summer St., Boston, MA 02110.

2. As shown in the attached affidavit, Mr. Epke is duly licensed to practice law in the

State of California and is a member of the bar in good standing of every jurisdiction

where he has been admitted to practice.

3. Mr. Epke is not currently suspended and has never been disbarred in any jurisdiction

and has not been the subject of any prior or pending disciplinary proceedings in any

jurisdiction.

4. He is familiar with, and will follow, the Department's rules, procedures, timetables,

and all Massachusetts laws.

Wherefore, Mr. Epke respectfully requests that the Department permit he be admitted *pro* 

hac vice to appear on behalf of and act as counsel of CLF in these proceedings.

Respectfully submitted,

Johannes Epke, Esq.

Conservation Law Foundation

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2