

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of South)	
Central MCN LLC for Approval of Transfer)	File No. EA-2016-0036
of Assets and a Certificate of Convenience and)	
Necessity)	

MOTION FOR ADMISSION PRO HAC VICE

COME NOW John F. Black, General Counsel, and Beverly G. Baughman, Senior Utility Counsel, City of Springfield, Missouri, by and through the Board of Public Utilities, (hereinafter “City Utilities” or “Springfield”), pursuant to 4 CSR 240-2.040(3)(C), and Missouri Supreme Court Rules 9.03, and hereby move for Pro Hac Vice admission of John P. Coyle. In support of this motion, the undersigned states as follows:

1. Mr. Coyle is a duly licensed attorney authorized to practice law in the following jurisdictions:
 - a. District of Columbia, Bar No. 334409; and
 - b. Commonwealth of Massachusetts, BBO No. 103530.

Mr. Coyle is employed as a Partner at the law firm of Duncan & Allen, Suite 700, 1730 Rhode Island Avenue, N.W., Washington, D.C. 20036-3115.

2. Mr. Coyle is an attorney in good standing in the District of Columbia and Massachusetts; the United States Supreme Court; the United States Courts of Appeals for the First through Tenth, District of Columbia and Federal Circuits; and the United States District Courts for the District of Columbia, District of Massachusetts, District of Maryland and the United States Court of Federal Claims, and is not under suspension or disbarment from the aforementioned or any other jurisdiction.

3. On September 9, 2015, Mr. Coyle submitted all information required by Supreme Court Rule 9.03, along with the applicable \$410.00 fee, to the Office of the Clerk of the Missouri Supreme Court. A copy of the receipt indicating submission of the required fee is attached hereto as **Exhibit A**.
4. Per Supreme Court Rule 9.3, John F. Black and Beverly G. Baughman have entered an appearance in this matter and will serve as co-counsel, along with Mr. Coyle in this case.

WHEREFORE, the undersigned respectfully requests that this Court enter its Order authorizing the Pro Hac Vice admission of John P. Coyle in the above-referenced matter.

Respectfully submitted,

/s/ John F. Black

/s/ Beverly G. Baughman

John F. Black	#30352
Rex McCall	#29751
Beverly G. Baughman	#40038

301 E. Central
Springfield, MO 65802
Telephone: (417) 831-8604 (Black)
Telephone: (417) 831-8605 (McCall)
Telephone: (417) 831-8609 (Baughman)
Email: john.black@cityutilities.net
Email: rex.mccall@cityutilities.net
Email: bev.baughman@cityutilities.net
Fax: (417) 831-8303

**ATTORNEYS FOR CITY
UTILITIES OF SPRINGFIELD**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Motion for Admission Pro Hac Vice was sent to the following parties via () U.S. Mail, postage prepaid, () facsimile, (x) electronic transmission, and/or () hand delivering this 30th day of October, 2015:

Office of the Public Counsel

P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Steve Dottheim
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
Email: Steve.Dottheim@psc.mo.gov

Beth Emery
Senior Vice President, General Counsel & Secretary
South Central MCN LLC
2 North LaSalle St.
Chicago, IL 60602
Email: bemery@gridliance.com

Kyle Barry
Husch Blackwell LLP
190 Carondelet Plaza
St. Louis, MO 63105-343
Email: kyle.barry@Huschblackwell.com

Terry M. Jarrett, Missouri Bar #45663
Healy Law Offices, LLC
514 East High Street, Suite 22
Jefferson City, MO 65101
Phone: (573) 415-8379
Fax: (573) 415-8379
Email: terry@healylawoffices.com

Alison M. Nelson, Missouri Bar #58004
Husch Blackwell LLP
190 Carondelet Plaza, Suite 600
St. Louis MO 63105-3433
Phone: (314) 480-1592
Fax: (314) 480-1505
Email: ali.nelson@huschblackwell.com

Lowell Pearson, Missouri Bar #46217

Husch Blackwell LLP
235 East High Street, P.O. Box 1251
Jefferson City, MO 65101-3206
Phone: (573) 761-1115
Fax: (573) 634-7854
Email: lowell.pearson@huschblackwell.com

/s/ John F. Black

John F. Black

#30352



**CLERK OF THE SUPREME COURT
STATE OF MISSOURI
POST OFFICE BOX 150
JEFFERSON CITY, MISSOURI
65102**

BILL L. THOMPSON
CLERK

TELEPHONE
(573) 751-4144

September 17, 2015

This will hereby acknowledge receipt of \$410 as required by Rule 6.01(m) for John P. Coyle, appearing in Application of South Central MCN, LLC for Approval of Transfer, Etc., Case No. EA-2016-0036, before the Missouri Public Service Commission, State of Missouri.

Bill L. Thompson

Bill L. Thompson, Clerk