

**STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH**

DOCKET NO. E-100, SUB 180

In the Matter of:	)	
Investigation of Proposed Net	)	<u>MOTION FOR LIMITED</u>
Metering Policy Changes	)	<u>PRACTICE</u>
	)	

Pursuant to N.C. Gen. Stat. §§ 62-60 and 84-4.1 and Rule R1-22 of the North Carolina Utilities Commission's ("Commission") Rules of Practice and Procedure, Caroline Leary, General Counsel of Environmental Working Group ("EWG"), respectfully request that the Commission enter an Order admitting her to practice before the Commission for the purpose of appearing on behalf of EWG in the above-captioned proceeding. In support of this motion, Ms. Leary alleges and states as follows:

1. Ms. Leary is an attorney in good standing and licensed to practice in the District of Columbia and South Carolina , and she will appear on behalf of EWG in the above-captioned proceedings.
2. Ms. Leary's full name, address, and bar membership information is as follows:

Caroline Leary  
Environmental Working Group  
1250 I Street NW, Suite 1000  
Washington, DC 20005  
Telephone: 202-939-9151  
Facsimile: (202) 232-2592  
cleary@ewg.org  
D.C State Bar No. 1023204  
S.C. Bar No. 100159

3. Ms. Leary will continue to represent EWG in the above-captioned proceeding until the final determination thereof, unless permitted to withdraw sooner by order of the Commission.

4. Ms. Leary agrees to be subject to the orders and amenable to the disciplinary action and civil jurisdiction of the General Court of Justice and the North Carolina State Bar in all respects as if she were regularly admitted and licensed members of the Bar of North Carolina in good standing.

5. The District of Columbia and South Carolina, in which Ms. Leary is regularly admitted to practice, grants permission to members in good standing of the North Carolina State Bar to appear before courts and regulatory commissions under circumstances similar to those authorized by N.C. Gen. Stat. § 84-4.1.

6. Ms. Leary is associated for purposes of appearing before the Commission in the above-docket with Catherine Cralle Jones and Andrea Bonvecchio of the Law Office of F. Bryan Brice, Jr., 127 W. Hargett St., Ste. 600, Raleigh, N.C. 27601, Tel.: 919-754-1600, Fax: 919-573-4252, who are residents of this State, are legally permitted to practice in the General Court of Justice of North Carolina, and upon whom service may be had in all matters connected with the legal proceedings, or any disciplinary matter with the same effect as if personally made on Ms. Leary.

7. Ms. Leary has not been disciplined by any court or lawyer regulatory organization nor has she had any *pro hac vice* revoked. The statements required by N.C. Gen. Stat. § 84-4.1 are attached as Exhibit A to this motion. Upon the Commission's issuance of an order granting this motion, the appropriate filings and fees will be made to

the State Treasurer for support of the General Court of Justice and to the North Carolina State Bar as required by N.C. Gen. Stat. § 84-4.1.

WHEREFORE, Ms. Leary respectfully requests that the Commission enter an Order admitting her to practice before the Commission for the purpose of appearing on behalf of EWG in the above-captioned proceeding.

Respectfully submitted this 11th day of February, 2022.



Catherine Cralle Jones  
N.C. State Bar No. 23733  
Andrea Bonvecchio.  
N.C. State Bar No. 56438  
LAW OFFICE OF F. BRYAN BRICE, JR.  
127 W. Hargett St., Ste. 600  
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bryan@attybryanbrice.com  
cathy@attybryanbrice.com

/s/ Caroline Leary  
Caroline Leary\*  
1250 I Street NW, Suite 1000  
Washington, DC 20005  
Telephone: 202-939-9151  
Facsimile: (202) 232-2592

cleary@ewg.org

*Counsel for Environmental Working Group*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Motion for Limited Practice* upon each of the parties of record in these proceedings or their attorneys of record by deposit in the U.S. Mail, postage prepaid, or by email transmission.

This the 11<sup>th</sup> day of February, 2022.

LAW OFFICE OF F. BRYAN BRICE, JR.

By:   
Catherine Cralle Jones

# **EXHIBIT A**

**(Statements Required by N.C. Gen.  
Stat. § 84-4.1)**

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UTILITIES COMMISSION  
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In the Matter of:	)	
Investigation of Proposed Net	)	<u>STATEMENT REQUIRED BY</u>
Metering Policy Changes	)	<u>N.C. GEN. STAT. § 84-4.1</u>
	)	

I, Caroline Leary, hereby state that:

1. I am an attorney of law regularly admitted to practice and in good standing in the District of Columbia. My full name, address, and bar identification number are:

Caroline Leary  
1250 I Street NW, Suite 1000  
Washington, DC 20005  
Telephone: 202-939-9151  
Facsimile: (202) 232-2592  
cleary@ewg.org  
D.C. Bar No: 1023204

2. I am employed by the Environmental Working Group (“EWG”) as a senior attorney and, through that employment, have been authorized to represent EWG in the above-captioned proceeding, which is currently pending before the North Carolina Utilities Commission. The address of the EWG’s Headquarters office in Washington, DC is 1250 I Street NW, Suite 1000, Washington, DC 20005.

3. Unless permitted to withdraw sooner by order of the Commission, I will continue to represent EWG in the above-captioned proceeding until the final determination thereof. With reference to all matters incident to the above-captioned proceeding, I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the Commission, the General Court of Justice, and the North

Carolina State Bar in all respects as if I were a regularly admitted and licensed member of the Bar of North Carolina in good standing.

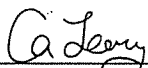
4. The District of Columbia, in which I am regularly admitted to practice, grants similar privileges to appear on a limited basis in judicial and regulatory proceedings being conducted in that jurisdiction to members of the Bar of North Carolina.

5. I have associated, for purposes of appearing and participating in Commission proceedings, with Catherine Cralle Jones of the Law Offices of F. Bryan Brice, Jr., an attorney who is a resident of North Carolina and is duly and legally admitted to practice in the General Court of Justice of North Carolina, upon whom service may be had in all matters connected with the above-captioned proceeding, or any disciplinary matter, with the same effect as if personally made on me within this State.

6. I have not been disciplined by any court or lawyer regulatory organization and have not had a revocation of any *pro hac vice* admission.

7. I will submit a check for \$25 to the North Carolina State Bar and a check for \$200 to the State Treasurer when the Motion is granted.

This 11 day of February, 2022.

  
\_\_\_\_\_  
Caroline Leary

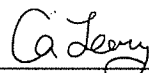
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DOCKET NO. E-100, SUB 180

In the Matter of:	)	
Investigation of Proposed Net	)	<u>STATEMENT REQUIRED BY</u>
Metering Policy Changes	)	<u>N.C. GEN. STAT. § 84-4.1(2)</u>
	)	

I, Caroline Leary, hereby certify that I am the General Counsel for Environmental Working Group ("EWG"), that the address of EWG's Headquarters office in Washington, DC is 1250 I Street NW, Suite 1000, Washington, DC 20005, and that EWG has requested that Caroline Leary represent it in the above-captioned proceeding before the N.C. Utilities Commission.

This the 11 day of February, 2022.



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Caroline Leary Title: General Counsel  
Environmental Working Group



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In the Matter of:	)	
Investigation of Proposed Net	)	<u>STATEMENT OF</u>
Metering Policy Changes	)	<u>TAX REPORTING</u>
	)	

Regarding the matters identified in items 3 & 4 of the Pro Hac Vice Registration Statement, I, Caroline Leary, verify that I will report any income earned to the North Carolina Department of Revenue if required to do so by law.



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Caroline Leary  
1250 I Street, NW, Suite 1000  
Washington, DC 20005  
Telephone: 202-939-9151  
Facsimile: (202) 232-2592

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