



## Filing Receipt

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DOCKET NO. 52321

APPLICATION OF ELECTRIC §  
RELIABILITY COUNCIL OF TEXAS, INC. § PUBLIC UTILITY COMMISSION  
FOR A DEBT OBLIGATION ORDER §  
PURSUANT TO CHAPTER 39, §  
SUBCHAPTER M, OF THE PUBLIC § OF TEXAS  
UTILITY REGULATORY ACT §

**MOTION FOR PRO HAC VICE ADMISSION OF THOMAS MILLAR**

I, Thomas Millar, file this motion for admission *pro hac vice* to appear as counsel for Citigroup Energy Inc. in this matter, pursuant to Texas Government Code § 82.0361 and Rule 19 of the Rules Governing Admission to the Bar of Texas. In support of this motion, I state as follows:

1. My office address, telephone number, fax number, and email address are:

Willkie Farr & Gallagher LLP  
1875 K Street, N.W.  
Washington, DC 20006  
(202) 303-1144 (t)  
(202) 303-2144 (f)  
[tmillar@willkie.com](mailto:tmillar@willkie.com)

2. I am associated with Jennifer Hardy, a practicing attorney licensed in the state of Texas, who will be participating in this proceeding. Ms. Hardy's State Bar number is 24096068 and her office address, telephone number, fax number, and email address are:

Willkie Farr & Gallagher LLP  
600 Travis Street  
Houston, TX 77002  
(713) 510-1766 (t)  
(713) 510-1799 (f)  
[jhardy2@willkie.com](mailto:jhardy2@willkie.com)

3. I have not appeared or sought leave to appear or participate in any case or cause in any Texas court or administrative proceeding within the past two years.

4. I am licensed to practice in the District of Columbia and Virginia, and am an active member in good standing of both the District of Columbia Bar Association and the Virginia State Bar. I am a member of the Bar of the Eastern District of Virginia.

5. I have not been the subject of disciplinary action by the Bar or courts of any jurisdiction in which I am licensed to practice during the last five years.

6. I have not been denied admission to the courts of any State or to any federal court during the last five years.

7. I am familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the Bar, and will at all times abide by and comply with the same so long as the above-captioned proceeding is pending and I have not withdrawn as counsel from the proceeding.

For the foregoing reasons, I respectfully request that this motion for admission *pro hac vice* be granted, and that I be afforded non-resident attorney status and allowed to participate for all purposes in this proceeding.

Respectfully submitted,

/s/ Thomas Millar  
Thomas Millar  
Willkie Farr & Gallagher LLP  
1875 K Street, N.W.  
Washington, DC 20006  
(202) 303-1144 (t)  
(202) 303-2144 (f)  
tmillar@willkie.com

**CERTIFICATE OF SERVICE**

I, Thomas Millar, Attorney for Citigroup Energy Inc., hereby certify that a true and correct copy of this document was served by e-mail on all parties of record in this proceeding on this 27<sup>th</sup> day of July, 2021 in accordance with the Second Order Suspending Rules issued in Project No. 50664.

*/s/ Thomas Millar*

Thomas Millar

DOCKET NO. 52321

APPLICATION OF ELECTRIC	§	
RELIABILITY COUNCIL OF TEXAS, INC.	§	PUBLIC UTILITY COMMISSION
FOR A DEBT OBLIGATION ORDER	§	
PURSUANT TO CHAPTER 39,	§	
SUBCHAPTER M, OF THE PUBLIC	§	OF TEXAS
UTILITY REGULATORY ACT	§	

**MOTION OF JENNIFER HARDY IN SUPPORT OF THE  
MOTION FOR PRO HAC VICE ADMISSION OF THOMAS MILLAR**

I, Jennifer Hardy, pursuant to Texas Government Code § 82.0361 and Rule 19 of the Rules Governing Admission to the Bar of Texas, hereby file this Motion in Support of the Motion for Pro Hac Vice Admission of Thomas Millar in the above captioned docket and respectfully show the following:

1. I am associated with Thomas Millar of Willkie Farr & Gallagher LLP at:

1875 K Street, N.W.  
Washington, DC 20006  
(202) 303-1144 (t)  
(202) 303-2144 (f)  
[tmillar@willkie.com](mailto:tmillar@willkie.com)

2. I am a resident practicing Texas attorney in good standing with the State Bar of Texas. My State Bar number, office address, telephone number, and fax number are included below in my signature block.

3. Mr. Millar is a reputable attorney and I recommend that he be granted permission to participate in the above-captioned proceeding.

For the foregoing reasons, I respectfully request Mr. Millar's Motion for Pro Hac Vice Admission in this docket be granted on behalf of Citigroup Energy Inc.

Respectfully submitted,

/s/ Jennifer Hardy  
Jennifer Hardy  
State Bar No. 24096068  
Willkie Farr & Gallagher LLP  
600 Travis Street  
Houston, TX 77002  
(713) 510-1766 (t)  
(713) 510-1799 (f)  
[jhardy2@willkie.com](mailto:jhardy2@willkie.com)

**CERTIFICATE OF SERVICE**

I, Jennifer Hardy, Attorney for Citigroup Energy Inc., hereby certify that a true and correct copy of this document was served by e-mail on all parties of record in this proceeding on this 27<sup>th</sup> day of July, 2021 in accordance with the Second Order Suspending Rules issued in Project No. 50664.

*/s/ Jennifer Hardy*

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Jennifer Hardy

# Board of Law Examiners

Appointed by the Supreme Court of Texas

July 26, 2021

Thomas R. Millar

Via: E-Mail

## Acknowledgment Letter

### Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

**This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:**

**Non-resident attorney: Thomas R. Millar**

**Case: 52321**

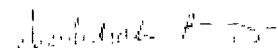
**Texas court or body: Public Utility Commission of Texas**

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Cordially,



**Nahdiah Hoang**  
Executive Director

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