## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE COMMISSION

CASE NO. 2011-00401

In the Matter of:

Application of Kentucky Power Company for Approval of)its Environmental Compliance Plan, Approval of its Amended)Environmental Cost Recovery Surcharge Tariffs, and for the)Grant of Certificates of Public Convenience and Necessity)for the Construction and Acquisition of Related Facilities)

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

Come the Interveners, Tom Vierheller, Beverly May, and Sierra Club (collectively "Movants") by counsel, and hereby move for the admission *pro hac vice* of Shannon W. Fisk as counsel for said Interveners. Attached hereto as Exhibit A is the Kentucky Bar Association Out-Of-State Certification Form certifying that Mr. Fisk has paid the fee for admission required by SCR 3.030(2). Furthermore, Mr. Fisk has previously been admitted to practice before this Commission in Case Nos. 2011-161 and 2011-162.

Respectfully submitted,

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Joe Childers, Esq. Joe F. Childers & Associates 300 Lexington Building 201 West Short Street Lexington, Kentucky 40507 Telephone: (859) 253-9824 Facsimile: (859) 258-9288 childerslaw81@gmail.com

Of counsel:

Kristin Henry Staff Attorney Sierra Club 85 Second Street San Francisco, CA 94105 Phone: (415) 977-5716 Fax: (415) 977-5793 kristin.henry@sierraclub.org

Dated: February 24, 2012

#### **CERTIFICATE OF SERVICE**

I certify that I mailed a copy of this Motion For Admission *Pro Hac Vice* by first class mail on February 24, 2012 to the following:

Mark R. Overstreet, Esq. Attorney at Law Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KY 40602-0634

Jennifer B. Hans, Esq. Dennis G. Howard II, Esq. Lawrence W. Cook, Esq. Assistant Attorney General's Office 1024 Capital Center Drive, Ste 200 Frankfort, KY 40601-8204

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. David F. Boehm Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

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# KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

COURT

Kentucky Public Service Commission

2011-00401

CASE NO.

### SCR 3.030 Membership, practice by nonmembers and classes of membership

(2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$100.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee.

The Kentucky Bar Association certifies that <u>Shannon W. Fisk</u> has paid the per case fee of \$100.00 in the above referenced case as required in SCR 3.030(2).

Michele M. Pogrotsky, Deputy Registrar