



**SIERRA
CLUB**
FOUNDED 1892

RECEIVED

JUL 15 2014

**PUBLIC SERVICE
COMMISSION**

July 15, 2014

Via Personal Delivery

Mr. Jeff Derouen, Executive Director
Case No. 2014-00166
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: Case No. 2014-00166 Motion to Admit Pro Hac Vice by Sierra Club

Dear Mr. Derouen,

Enclosed, please find one original and ten (10) copies of Ben Taylor and Sierra Club's Motion to Admit Pro Hac Vice, filed today in the above-referenced matter via personal delivery. By copy of this letter, all parties listed on the Certificate of Service have been served via USPS and e-mail. Please place this document of file.

Sincerely,

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

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE INTEGRATED RESOURCE PLAN OF)
BIG RIVERS ELECTRIC CORPORATION) **CASE NO. 2014-00166**
)

MOTION TO ADMIT KRISTIN HENRY *PRO HAC VICE* BY SIERRA CLUB

COMES NOW Intervenor Sierra Club, by and through counsel, hereby seeks to have admitted to practice law in Kentucky, for the limited purpose of this matter, Hon. Kristin Henry, Counsel for Sierra Club, 85 2nd Street Floor 2, San Francisco, CA 94105. Mrs. Henry is a member in good standing of the State Bar of California (CA Bar No. 220908).

Attached please find an approved Kentucky Bar Association (KBA) out-of-state counsel certification form confirming payment of \$270, pursuant to Kentucky Supreme Court Rule 3.030, as well as a proposed order for the Commission.

WHEREFORE, the Commission is hereby requested to enter an Order permitting Mrs. Henry to appear *pro hac vice* in this case.

Respectfully submitted,

Dated: July 15, 2014



Joe Childers, Esq.
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, Kentucky 40507
859-253-9824
859-258-9288 (facsimile)
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

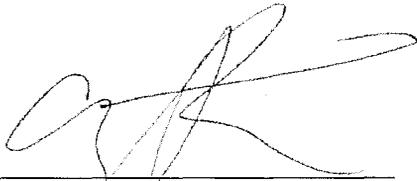
CERTIFICATE OF SERVICE

I certify that I mailed a copy of this MOTION TO ADMIT PRO HAC VICE by first class mail on July 15, 2014 to the following parties of record:

Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202

James M. Miller, Esq.
Tyson Kamuf, Esq.
Attorney at Law
Sullivan, Mountjoy, Stainback & Miller, PSC
100 St. Ann Street
P.O. Box 727
Owensboro, KY 42302-0727

Jennifer B Hans, Esq.
Lawrence W. Cook, Esq.
Angela M. Goad, Esq.
Assistant Attorney Generals
Attorney General's Office
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204



Anthony Raduazo
Legal Assistant
Sierra Club Environmental Law Program

KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET
FRANKFORT, KENTUCKY 40601-1812

(502) 564-3795

FAX (502) 564-3225

www.kybar.org



OFFICERS

William E. Johnson
President

Douglass Farnsley
President-Elect

R. Michael Sullivan
Vice President

Thomas L. Rouse
Immediate Past President

YOUNG LAWYERS
Bradley J. Sayles
Chair

EXECUTIVE DIRECTOR
John D. Meyers

BOARD OF GOVERNORS

Amy D. Cabbage
Melinda G. Dalton
William R. Garmer
Thomas N. Kerrick
Howard Oliver Mann
Earl M. McGuire
J. D. Meyer
Eileen M. O'Brien
Michael M. Pitman
W. Fletcher Schrock
Gary J. Sergent
Bobby Simpson
J. Steven Smith
John Vincent

KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

COURT Kentucky Public Service Commission

CASE NO. 2014-00166

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 \$270.00 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 Kristin A. Henry has paid the per-case fee of \$270.00 in the above referenced case as required in SCR 3.030(2).

A handwritten signature in black ink that reads 'Michele M. Pogrotsky'. The signature is written in a cursive style and is positioned above a horizontal line.

Michele M. Pogrotsky, Deputy Registrar

KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET
FRANKFORT, KENTUCKY 40601-1812
(502) 564-3795
FAX (502) 564-3225
www.kybar.org

OFFICERS

Thomas L. Rouse
President

William E. Johnson
President-Elect

Douglass Farnsley
Vice President

W. Douglas Myers
Immediate Past President

YOUNG LAWYERS
Carl N. Frazier
Chair

EXECUTIVE DIRECTOR
John D. Meyers



BOARD OF GOVERNORS

Douglas C. Ballantine
Anita M. Britton
Amy D. Cabbage
Jonathan Freed
William R. Garner
Thomas N. Kerrick
David V. Kramer
Howard Oliver Mann
Earl M. McGuire
J. D. Meyer
Michael M. Pitman
Bobby Rowe
J. Stephen Smith
M. Gail Wilson

KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

2014-00166

COURT Kentucky Public Service Commission

CASE NO. 2014-00002

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 \$270.00 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.

Kristin A. Henry

The Kentucky Bar Association certifies that ~~Anthony Reduazo~~ has paid the per-case fee of \$270.00 in the above referenced case as required in SCR 3.030(2).

Michele Pogrotsky

Michele M. Pogrotsky, Deputy Registrar



**SIERRA
CLUB**
FOUNDED 1892

June 25, 2014

Via U.S. Mail

Kentucky Bar Association
ATTN: Membership Department
514 W Main St.
Frankfort, KY 40601-1812

Re: OUT-OF STATE CERTIFICATION REQUEST FORM for Kristin Henry

Enclosed please find a completed OUT-OF-STATE CERTIFICATION REQUEST FORM for Kristin Henry, as well as a check in the amount of \$270.00 made out to the Kentucky Bar Association.

Please mail the approval/out-of-state certification to the address below:

Anthony Raduazo
Sierra Club
85 Second St., Floor 2
San Francisco, CA 94105
(415) 977-5629

Sincerely,

Anthony Raduazo
Sierra Club Environmental Law Program
85 Second St., Floor 2
San Francisco, CA 94105
Office: (415) 977-5629
Mobile: (978) 870-9435

RECEIVED
JUN 27 2014
ACCOUNTING DEPT.



KENTUCKY BAR ASSOCIATION
OUT-OF-STATE CERTIFICATION REQUEST FORM

RECEIVED

JUN 27 2014

ACCOUNTING DEPT.

PLEASE PROVIDE THIS OFFICE WITH THE FOLLOWING INFORMATION:

NAME: Anthony Raduazo ✓ Kristin Henry
(PLEASE PRINT)

#7154
\$270

DATE OF BIRTH: 7/31/73

ADDRESS TO BE USED FOR KBA RECORDS:

Sierra Club, 85 Second Street, Floor 2
San Francisco, CA 94105

Please Note: All Out of State Certification Receipts will be sent to Out of State Attorney unless stated otherwise.
Please indicate if a copy is needed by fax by providing a cover sheet.

TELEPHONE NUMBER: (Please indicate if this is a business or home telephone number)

415-977-5716 Home Business

FAX NUMBER: 415-977-5793 E-MAIL ADDRESS: kristin.henry@sierraclub.org

STATE BARS OF WHICH YOU ARE A MEMBER IN GOOD STANDING: (Include membership number)

California / 220908

KY COURT for which you seek Certification: Kentucky Public Service Commission

CASE NUMBER for which you seek Certification: ~~2014-00002~~ 2014-00100

KENTUCKY CO-COUNSEL / BAR #: Joe F. Childers / 11850 10/5/1981
(REQUIRED)

Since January 1, 2006, have you practiced a case in Kentucky under SCR 3.030? Yes 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 Supreme Court of Kentucky, pays a one time per case fee of two hundred seventy dollars (\$270.00) 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.

I have read and agree to comply with the requirements set forth in SCR 3.030(2), including submitting to the Rules of Professional Conduct of The Kentucky Supreme Court

I certify by signing this form that I am a member in good standing in my state(s) of licensure, and that the information provided by me on this form is true and correct

Kristin A. Henry
SIGNATURE

RETURN ORIGINAL FORM TO
KENTUCKY BAR ASSOCIATION
ATTN: MEMBERSHIP DEPARTMENT
514 W MAIN ST
FRANKFORT KY 40601-1812
Phone (502) 664-3796
Or pay on the web at www.kybar.org

Veda Aldridge

From: Anthony Raduazo <anthony.raduazo@sierraclub.org>
Sent: Monday, July 14, 2014 2:54 PM
To: Veda Aldridge
Subject: Re: Corrected Out-of-State Certification Form for Kristin A. Henry

No - Kristin was admitted PHV in 2014-00002, but we sent a payment for that earlier in the year and was an entirely different case.

Anthony Raduazo
Legal Assistant
Sierra Club Environmental Law Program
85 Second Street, Second Floor
San Francisco, CA 94105
Phone: 415-977-5629
Fax: 415-977-5793

On Mon, Jul 14, 2014 at 11:56 AM, Veda Aldridge <valdridge@kybar.org> wrote:

Anthony – just one more question, was the case number ever 2014-00002?

From: Anthony Raduazo [mailto:anthony.raduazo@sierraclub.org]
Sent: Monday, July 14, 2014 2:38 PM
To: Veda Aldridge
Subject: Re: Corrected Out-of-State Certification Form for Kristin A. Henry

The Case Number is different as well, yes - the case number should be 2014-00166.

Anthony Raduazo
Legal Assistant
Sierra Club Environmental Law Program
85 Second Street, Second Floor
San Francisco, CA 94105
Phone: 415-977-5629

Fax: 415-977-5793

On Mon, Jul 14, 2014 at 11:38 AM, Veda Aldridge <valdridge@kybar.org> wrote:

Hi Anthony! Thanks for the email. I see that the names were confused on the paperwork. Did the case number change?

From: Anthony Raduazo [mailto:anthony.raduazo@sierraclub.org]
Sent: Monday, July 14, 2014 2:24 PM
To: Veda Aldridge
Subject: Corrected Out-of-State Certification Form for Kristin A. Henry

Hello Veda,

I've attached the Out-of-State Certification Form for Kristin A. Henry with the necessary corrections to this email. Thank you so much for your help!

Best,

Anthony Raduazo

Legal Assistant

Sierra Club Environmental Law Program

85 Second Street, Second Floor

San Francisco, CA 94105

Phone: 415-977-5629

Fax: 415-977-5793

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE INTEGRATED RESOURCE PLAN OF)
BIG RIVERS ELECTRIC CORPORATION) **CASE NO. 2014-00166**
)

ORDER

On July 15, 2014, Joe F. Childers, an attorney licensed to practice law in the Commonwealth of Kentucky, who is representing Intervenor Sierra Club, moved the Commission to admit *pro hac vice* Kristin Henry, an attorney whose office is in the state of California, to practice law before the Commission on behalf of Intervenors Ben Taylor, and Sierra Club, in this case. In support of the request, Kristin Henry has shown that she is a member in good standing of another state bar and has been certified to practice before the Commission in this case by the Kentucky Bar Association under Supreme Court Rule 3.030(2). In addition, Kristin Henry has agreed to be subject to the jurisdiction and rules of the Commission and the Kentucky Bar Association.

IT IS THEREFORE ORDERED that Kristin Henry is admitted *pro hac vice* for the purpose of representing Intervenors Ben Taylor, and Sierra Club, in the above-styled proceeding provided that Joe F. Childers, Joe F. Childers & Associates, 300 Lexington Building, 201 West Short Street, Lexington, KY 40507, or another member of the Kentucky Bar Association, acts as co-counsel and is present at any and all proceedings before this Commission.

By the Commission

ATTEST:

Executive Director