

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS RATES FOR ELECTRIC)
AND GAS SERVICE, A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO)
DEPLOY ADVANCED METERING) CASE NO.
INFRASTRUCTURE, APPROVAL OF CERTAIN) 2020-00349
REGULATORY AND ACCOUNTING)
TREATMENTS, AND ESTABLISHMENT OF A)
ONE-YEAR SURCREDIT)

And

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ELECTRONIC APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS RATES FOR ELECTRIC)
AND GAS SERVICE, A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY TO)
DEPLOY ADVANCED METERING) CASE NO.
INFRASTRUCTURE, APPROVAL OF CERTAIN) 2020-00350
REGULATORY AND ACCOUNTING)
TREATMENTS, AND ESTABLISHMENT OF A)
ONE-YEAR SURCREDIT)

**MOTION OF JOINT INTERVENORS MOUNTAIN ASSOCIATION, KENTUCKIANS
FOR THE COMMONWEALTH, AND KENTUCKY SOLAR ENERGY SOCIETY TO
ALLOW VIRTUAL HEARING PARTICIPATION BY COUNSEL**

Tom FitzGerald
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Counsel for Joint Intervenors
Mountain Association, Kentucky
Solar Energy Society, and
Kentuckians For The Commonwealth

August 12, 2021

Come the Joint Intervenors Kentucky Solar Energy Society, Kentuckians for the Commonwealth, Mountain Association (Case No. 2020-00349), and Metropolitan Housing Coalition (Case No. 2020-00350), (collectively "Joint Intervenors"), and respectfully move the Public Service Commission ("Commission") to allow Joint Intervenor's counsel, Tom FitzGerald, to participate in the hearing scheduled for August 17 and August 18, 2021, by virtual means rather than in-person attendance at the hearing.

Joint Intervenors believe that there exists good cause to excuse their counsel from in-person attendance. In the recent 2021-027 Amended Order from the Kentucky Court of Justice, issued on August 9, 2021, courts are encouraged to conduct civil and criminal matters remotely in light of the current outbreak of the COVID-19 Delta variant and consistently with the most recent guidance from the Centers for Disease Control. Joint Intervenors believe that the same recommendation is equally applicable to administrative hearings such as that scheduled for August 17-18 in this matter. Additionally, counsel for Joint Intervenors is 66 years of age, and resides with one family member who has been deemed medically fragile, so that in-person participation creates an unnecessary risk of exposure to and communication of the disease.

In earlier proceedings in both these cases and the recently concluded Kentucky Power Company Case, Case No. 2020-00174, the

Joint Intervenors' undersigned counsel was able to fully participate both in presenting witnesses for, and conducting, cross-examination without problem. Counsel for Joint Intervenors has the capacity to effectively participate remotely through the platform provided by the Commission for the hearing.

For these reasons, Joint Intervenors respectfully request that their counsel, Tom FitzGerald, be excused from in-person attendance at the hearing scheduled for August 17-18, 2021 and that he be permitted to participate virtually in all matters at such hearing.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that this electronic filing has been transmitted to the Commission on August 12, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that in accordance with the July 22, 2021 Commission Order in Case No. 2020-00085 and notwithstanding 807 KAR

5:001 Section 8(3), no original paper copy of this filing will be filed with the Commission.

A handwritten signature in black ink, appearing to read 'Tom FitzGerald', with a long horizontal stroke extending to the right.

Tom FitzGerald