COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
AMERICAN ELECTRIC POWER COMPANY, INC.,)	
KENTUCKY POWER COMPANY AND LIBERTY)	CASE NO.
UTILITIES CO. FOR APPROVAL OF THE)	2021-00481
TRANSFER OF OWNERSHIP AND CONTROL OF)	
KENTUCKY POWER COMPANY)	

SIERRA CLUB'S MOTION TO PARTICIPATE VIRTUALLY IN MARCH 28-29, 2022, HEARING

Pursuant to Commission Staff's March 8, 2022, email to the parties, as well as a forthcoming Order, addressing this subject in the above-captioned case, Sierra Club respectfully moves to the Commission to permit the undersigned counsel to attend the March 28-29, 2022, hearing virtually. In support of this Motion, Sierra Club states that Sierra Club will not be presenting a witness at the hearing; that its current COVID-19 policy prohibits work-related travel by staff, with exceptions considered on a case-by-case basis only for extraordinary essential situations; and that its virtual attendance will not prejudice the Commission or any party. Counsel for Sierra Club has participated virtually in several Commission hearings during the pandemic without issue, and their virtual attendance at this hearing would likewise go smoothly, particularly considering that Sierra Club has no testifying witness. Sierra Club thanks the Commission for its consideration of this Motion.

Dated: March 8, 2022 Respectfully submitted,

Joe F. Childers, Esq.

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Of counsel

(not licensed in Kentucky):

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Counsel for Sierra Club

CERTIFICATE OF SERVICE

This is to certify that the foregoing copy of SIERRA CLUB'S MOTION TO PARTICIPATE VIRTUALLY IN MARCH 28-29, 2022, HEARING in this case is being electronically transmitted to the Commission on March 8, 2022; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

JOE F. CHILDERS

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