

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 UTILITIES CO. )  
FOR APPROVAL OF THE TRANSFER OF OWNERSHIP)  
AND CONTROL OF KENTUCKY POWER COMPANY )

CASE NO.  
2021-00481

---

**LS POWER DEVELOPMENT, LLC'S MOTION TO  
ALLOW VIRTUAL HEARING PARTICIPATION**

---

Comes now LS Power Development, LLC ("LS Power"), by and through counsel, and hereby respectfully moves the Kentucky Public Service Commission ("Commission") to allow its sole witness, Thomas Hoatson, to participate virtually at the hearing scheduled for March 28-29, 2022.

In support of this motion LS Power seeks this permission based on the continued risks attendant to and associated with the COVID-19 pandemic. In further support LS Power states that Mr. Hoatson has provided testimony and Responses to two Request for Information questions propounded by Joint Applicants in this case. Should the Commission grant this Motion to appear for cross-examination virtually neither the Commission nor any party will be prejudiced thereby, and Mr. Hoatson is available to participate in any pre-hearing 'dry-runs' required by the Commission to insure a successful virtual participation free of technical issues. LS Power's attorney, Mark David Goss, plans to participate live in the Commission's Hearing Room One (Richard Raff Hearing Room) for both days of the hearing.

Wherefore, for the reasons stated LS Power requests the Commission to sustain this Motion.

This 14<sup>th</sup> day of March, 2022.

Respectfully Submitted,

*Mark David Goss*

---

Mark David Goss  
L. Allyson Honaker  
GOSS SAMFORD, PLLC  
2365 Harrodsburg Rd., Suite B-325  
Lexington, KY 40504  
Phone: (859) 368-7740  
Email: [mdgoss@gosssamfordlaw.com](mailto:mdgoss@gosssamfordlaw.com)  
Email: [allyson@gosssamfordlaw.com](mailto:allyson@gosssamfordlaw.com)

*Counsel for LS Power Development, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of LS Power Development, LLC's Motion to Allow Virtual Hearing Preparation is being electronically transmitted to the Commission on March 14, 2022; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

*Mark David Goss*

---

Mark David Goss