

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

Electronic Investigation Of Kentucky Power	)	Case No. 2022-00283
Company Rockport Deferral Mechanism	)	

**Kentucky Power Company’s Motion to Participate Virtually**  
**at November 28-29, 2022 Hearing**

Kentucky Power Company (“Kentucky Power” or the “Company”) moves the Commission to allow the following persons to attend remotely by videoconference the hearing scheduled for November 28-29, 2022: Company Witness Heather M. Whitney, Company Witness Allyson L. Keaton, and counsel for Kentucky Power, Christen M. Blend (*pro hac vice* pending).

The participants seeking leave to attend remotely are each based outside the Commonwealth of Kentucky. Travel to the hearing also is problematic due to the ongoing COVID-19 pandemic. The Company requests that these persons be allowed to attend remotely to reduce the difficulties associated with travel to the hearing. Ms. Keaton did not file testimony in this case and is a witness only on one of the Company’s data request responses (AG-KIUC 1-2). Ms. Whitney did not file testimony in this case and is a witness only on 12 of the Company’s data request responses (KPSC 1-2, KPSC 1-3, KPSC 2-3, AG-KIUC 1-1, AG-KIUC 1-2, AG-KIUC 1-3, AG-KIUC 1-4, AG-KIUC 1-5, AG-KIUC 1-6, AG-KIUC 1-7, AG-KIUC 2-7, and AG-KIUC 2-8). The Company does not anticipate that either of these witnesses will offer rebuttal testimony on behalf of the Company.

Ms. Whitney, Ms. Keaton, and Ms. Blend are each equipped with the technology necessary to enable remote participation, and if granted leave to appear remotely, will participate in a test of technology with Commission Staff to ensure that their audio and video capabilities, and ability to

share documents remotely, are sufficient. Ms. Whitney, Ms. Keaton, and Ms. Blend's virtual participation will not prejudice the Commission or any party.

Counsel for Kentucky Power, Katie M. Glass and Hector Garcia Santana (*pro hac vice* pending), and Company Witness Brian K. West will appear at the hearing in person in the Richard Raff Hearing Room.

Given the difficulties due to the ongoing COVID-19 pandemic, the time and expense of travel that would be required to participate in person, and Ms. Whitney and Ms. Keaton's limited involvement in this matter, Kentucky Power respectfully requests that the Commission grant Ms. Whitney, Ms. Keaton, and Ms. Blend leave to appear remotely at the November 28-29, 2022 hearing in this case

WHEREFORE, Kentucky Power Company respectfully requests the Commission to enter an Order:

1. Allowing Heather M. Whitney, Allyson L. Keaton, and Christen M. Blend to participate remotely by videoconference on behalf of Kentucky Power at the hearing scheduled for November 28-29, 2022; and
2. Granting Kentucky Power all further relief to which it may be entitled.

Respectfully submitted,



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COMPANY