

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

**In the Matter of:**

<b>ELECTRONIC TARIFF FILING OF</b>	)	
<b>KENTUCKY UTILITIES COMPANY FOR</b>	)	<b>CASE NO.</b>
<b>APPROVAL OF AN ECONOMIC</b>	)	<b>2022-00371</b>
<b>DEVELOPMENT RIDER SPECIAL</b>	)	
<b>CONTRACT WITH BITIKI-KY, LLC</b>	)	

**MOTION OF JOINT INTERVENORS KENTUCKIANS FOR THE  
COMMONWEALTH, KENTUCKY SOLAR ENERGY SOCIETY, MOUNTAIN  
ASSOCIATION, AND KENTUCKY RESOURCES COUNCIL INC.'S TO ADMIT  
THOMAS CMAR *PRO HAC VICE***

Come Joint Intervenors, Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and the Kentucky Resources Council, Inc., by and through counsel, respectfully seek to have admitted to practice law in Kentucky, for the limited purpose of participation in this matter as their counsel: Thomas Cmar, Earthjustice, 6608 Wooster Pike, Cincinnati, Ohio 45227.

Mr. Cmar is a member in good standing of the State Bar of Ohio (Bar No. 100833, admitted 1/24/2022), the State Bar of Illinois (Bar No. 6298307, admitted 5/07/2009), and the State Bar of New York (Bar No. 2489443, admitted 1/26/05), and the following federal courts:

- U.S. Court of Appeals for the Second Circuit, Date of Admission 3/19/2009,
- U.S. Court of Appeals for the Fifth Circuit, Date of Admission 12/16/2015,
- U.S. Court of Appeals for the Sixth Circuit, Date of Admission 1/22/2018,
- U.S. Court of Appeals for the Seventh Circuit, Date of Admission 9/23/2016,
- U.S. Court of Appeals for the D.C. Circuit, Date of Admission 7/16/2007,
- U.S. District Court for the Southern District of New York, Date of Admission 12/6/2006,

and

- U.S. District Court for the Central District of Illinois, Date of Admission 5/23/2018.

Attached please find an invoice for the approved Kentucky Bar Association out-of-state counsel certification form, confirming payment of \$317.75 for Mr. Cmar, pursuant to Kentucky Supreme Court Rule 3.030. Mr. Cmar's PHV number is PH29923440.

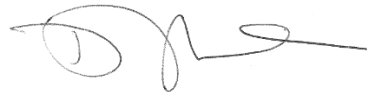
**WHEREFORE**, the Commission is hereby requested to enter an Order permitting Mr. Cmar to appear *pro hac vice* in this case.

Respectfully submitted,

Dated: April 10, 2023

*Of counsel*  
(not licensed in Kentucky):

Thomas Cmar, Esq.  
Earthjustice  
6608 Wooster Pike  
Cincinnati, OH 45227  
Phone: (312) 257-9338  
Email: [tcmar@earthjustice.org](mailto:tcmar@earthjustice.org)



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Tom FitzGerald, Esq.  
Ashley Wilmes, Esq.  
Kentucky Resources Council  
P.O. Box 1070  
Frankfort, KY 40602  
Phone: (502) 551-3675  
Email: [Ashley@krc.org](mailto:Ashley@krc.org)  
Email: [FitzKRC@aol.com](mailto:FitzKRC@aol.com)

*Counsel for Joint Intervenors Kentuckians  
for the Commonwealth, Kentucky Solar  
Energy Society, Mountain Association, and  
Kentucky Resources Council, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of Motion of Joint Intervenors Kentuckians for the Commonwealth, Kentucky Solar Energy Society, Mountain Association, and Kentucky Resources Council, Inc. To Admit Thomas Cmar *Pro Hac Vice* in this action is being electronically transmitted to the Commission on April 10, 2023, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

*/s/ Tom FitzGerald*

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Tom FitzGerald



**Kentucky Bar Association**  
 514 West Main Street  
 Frankfort, KY 40601 -1812  
 (502) 564-3795

**PAID**

**Invoice**

Date	Invoice #
4/6/2023	200092163

Bill To	Recipient Information
Thomas Cmar Earthjustice 6608 Wooster Pike Cincinnati, OH 45227 United States	Thomas Cmar Earthjustice 6608 Wooster Pike Cincinnati, OH 45227 United States

Terms	Due Date
Due on receipt	4/6/2023

Date	Qty	Description	Price	Totals
4/6/2023	1	Pro Hac Fee (Amount includes a 2.50% Administrative Processing Fee)	\$317.75	\$317.75
		<b>Sub-Total</b>		\$317.75
		<b>Total</b>		\$317.75

**Payments/Refunds**

Date	Qty	Description	Price	Totals
4/6/2023	1	Payment via Credit Card (using card xxxxxxxxxxxx5948) Applied to invoice on 4/6/2023 12:08:39 PM	(\$317.75)	(\$317.75)
		<b>Total Payments/Refunds</b>		(\$317.75)
		<b>Balance Due</b>		\$0.00