

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY POWER)	
COMPANY FOR (1) A GENERAL ADJUSTMENT OF ITS)	
RATES FOR ELECTRIC SERVICE; (2) APPROVAL OF)	
TARIFFS AND RIDERS; (3) APPROVAL OF)	
ACCOUNTING PRACTICES TO ESTABLISH)	Case No. 2023-00159
REGULATORY ASSETS AND LIABILITIES; (4) A)	
SECURITIZATION FINANCING ORDER; AND (5) ALL)	
OTHER REQUIRED APPROVALS AND RELIEF)	

**MOTION OF MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS'
LAW CENTER, KENTUCKIANS FOR THE COMMONWEALTH, AND
KENTUCKY SOLAR ENERGY SOCIETY FOR WITNESS TO
PARTICIPATE VIRTUALLY AND FOR DATES CERTAIN**

Come Mountain Association, Appalachian Citizens' Law Center, Kentuckians For The Commonwealth, and Kentucky Solar Energy Society (collectively "Joint Intervenors"), by counsel, and respectfully move the Kentucky Public Service Commission ("Commission") to allow Tyler Comings, who will be a witness for Joint Intervenors, to testify virtually at the hearing in this case, currently scheduled to begin November 28, 2023. In support of this motion, Joint Intervenors state the following:

1. Mr. Comings filed Direct Testimony on October 2, 2023, concerning the Company's requested return on equity and proposed securitization.
2. Mr. Comings is a third-party consultant retained by Joint Intervenors and is based in Massachusetts.

3. The only data requests propounded to Joint Intervenors regarding Mr. Comings' testimony were from the Company, requesting "all schedules, tables, and charts included in" and "all workpapers, source documents, and electronic spreadsheets used in" his testimony.

4. On November 20, 2023, the Company filed a settlement agreement and motion to approve which includes the Joint Intervenors as a signatory party.

5. Further, Mr. Comings has another obligation on November 30, 2023.

6. Due to Mr. Comings' location outside the Commonwealth of Kentucky, the limited nature of inquiries regarding his testimony so far, and the fact of the settlement agreement and motion to approve, in order to reduce the time, expense, and other logistics associated with travelling to the hearing in Frankfort, Kentucky, Joint Intervenors request that Mr. Comings be permitted to participate remotely by videoconference at the hearing in this matter scheduled to begin November 28, 2023 on a date certain of either November 28-29, or December 1, 2023.

7. Mr. Comings is 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 his audio and video capabilities, and ability to share documents remotely if needed, are sufficient.

8. Mr. Comings' virtual participation would not prejudice the Commission or any party.

9. Joint Intervenors also filed written direct testimony from Joshua Bills and Andrew McDonald, who anticipate being available to participate in the hearing in this case in person.

10. The only data requests propounded to Joint Intervenors regarding Mr. Bills' testimony were from the Company.

11. Mr. Bills has another obligation beginning December 4, 2023.

12. Due the fact of the settlement agreement and motion to approve, Joint Intervenors request that Mr. Bills be permitted testify on a date certain between November 28 and December 1, 2023.

WHEREFORE, for these reasons, Joint Intervenors respectfully move the Commission to grant leave for Mr. Comings to testify remotely and participate in the hearing virtually on a date certain of either November 28-29, or December 1, 2023, and for Mr. Bills to testify on a date certain between November 28 and December 1, 2023.

Respectfully Submitted,

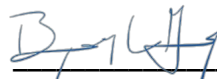


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CERTIFICATE OF SERVICE

In accordance with the Commission's July 22, 2021 Order in Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19*, this is to certify that the electronic filing was submitted to the Commission on November 20, 2023; that the documents in this electronic filing are a true representations of the materials prepared for the filing; and that the Commission has not excused any party from electronic filing procedures for this case at this time.



Byron L. Gary