

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
POWER COMPANY FOR: (1) APPROVAL TO	)	
EXPAND ITS TARGETED ENERGY	)	
EFFICIENCY PROGRAM; (2) APPROVAL OF A	)	
HOME ENERGY IMPROVEMENT PROGRAM	)	
AND A COMMERCIAL ENERGY SOLUTIONS	)	
PROGRAM; (3) AUTHORITY TO RECOVER	)	
COSTS AND NET LOST REVENUES, AND TO	)	CASE NO. 2024-00115
RECEIVE INCENTIVES ASSOCIATED WITH	)	
THE IMPLEMENTATION OF ITS	)	
DEMAND-SIDE MANAGEMENT/ENERGY	)	
EFFICIENCY PROGRAMS; (4) APPROVAL OF	)	
REVISED TARIFF D.S.M.C.; (5) ACCEPTANCE	)	
OF ITS ANNUAL DSM STATUS REPORT; AND	)	
(6) ALL OTHER REQUIRED APPROVALS AND	)	
RELIEF	)	

**MOUNTAIN ASSOCIATION, APPALACHIAN CITIZENS' LAW CENTER,  
KENTUCKIANS FOR THE COMMONWEALTH, AND KENTUCKY SOLAR ENERGY  
SOCIETY'S MOTION TO ADMIT CASSANDRA MCCRAE *PRO HAC VICE***

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Joint Intervenors Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society, by and through counsel, respectfully seek to have admitted to practice law in Kentucky, for the limited purpose of this matter, as their counsel: Cassandra McCrae, 1617 JFK Blvd., Ste. 2020, Philadelphia, PA 19103. Ms. McCrae is a member in good standing of the State Bar of Texas (Bar No. 24094830), the State Bar of Pennsylvania (Bar No. 325253), and the U.S. District Court, Western District of Texas.

Attached please find an invoice for the approved Kentucky Bar Association out-of-state counsel certification form, confirming payment of \$317.75 for Ms. McCrae,

pursuant to Kentucky Supreme Court Rule 3.030. Ms. McCrae's PHV number is PH29922777.

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

Respectfully submitted,



Byron Gary

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Kentucky Resources Council  
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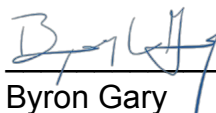
*Of counsel*  
(not licensed in Kentucky):

Cassandra McCrae, Esq.  
Earthjustice  
1617 JFK Blvd., Ste. 2020  
Philadelphia, PA 19103  
Phone: (215) 671-6493  
Email: cmccrae@earthjustice.org

*Counsel for Joint Intervenors Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society*

### **CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of *Mountain Association, Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Kentucky Solar Energy Society's Motion to Admit Cassandra McCrae Pro Hac Vice* in this action is being electronically transmitted to the Commission on December 02, 2024, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



Byron Gary



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

**PAID**

**Invoice**

Date	Invoice #
11/21/2024	200119245

Bill To	Recipient Information
Cassandra McCrae 657 W Kingsley St Philadelphia, PA 19144 United States	Cassandra McCrae Earthjustice 1617 John F. Kennedy Blvd Suite 2020 Philadelphia, PA 19103 United States

Terms	Due Date
Due on receipt	11/21/2024

Date	Qty	Description	Price	Totals
11/21/2024	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
11/21/2024	1	Payment via Credit Card (using card xxxxxxxxxxxx3019) <i>Applied to invoice on 11/21/2024 9:06:08 PM</i>	(\$317.75)	(\$317.75)
			<b>Total Payments/Refunds</b>	(\$317.75)
			<b>Balance Due</b>	\$0.00

**Comments:**

The Kentucky Bar Association certifies that Cassandra McCrae has paid the per-case fee of \$310.00 on 11/21/2024 for the Kentucky Public Service Commission Case #2024-00115 as required in SCR 3.030(2). Pro Hac Vice #PH29922777