

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

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF DUKE</b>	)	
<b>ENERGY KENTUCKY, INC. FOR A</b>	)	
<b>CERTIFICATE OF PUBLIC CONVENIENCE</b>	)	
<b>AND NECESSITY TO CONVERT ITS WET FLUE</b>	)	
<b>GAS DESULFURIZATION SYSTEM FROM A</b>	)	
<b>QUICKLIME REAGENT PROCESS TO A</b>	)	<b>Case No. 2024-00152</b>
<b>LIMESTONE REAGENT HANDLING SYSTEM</b>	)	
<b>AT ITS EAST BEND GENERATING STATION</b>	)	
<b>AND FOR APPROVAL TO AMEND ITS</b>	)	
<b>ENVIRONMENTAL COMPLIANCE PLAN FOR</b>	)	
<b>RECOVERY BY ENVIRONMENTAL</b>	)	
<b>SURCHARGE MECHANISM</b>	)	
	)	
	)	
	)	

---

**SIERRA CLUB’S MOTION TO ADMIT NATHANIEL SHOAFF *PRO HAC VICE***

---

Intervenor Sierra Club, by and through counsel, respectfully requests the admission *pro hac vice* of Nathaniel Shoaff to practice law in Kentucky, for the limited purpose of this matter, as counsel for Sierra Club in the above-captioned matter.

Mr. Shoaff is a member in good standing of the state of California (Bar No. 256641, Date of Admission: June 9, 2008), and by his signature appearing below verifies the same. He is also admitted to the following courts:

- U.S. District Court for the Northern District of California
- U.S. Court of Appeals for the 9th Circuit
- U.S. Court of Appeals for the 10th Circuit
- U.S. Court of Appeals for the District of Columbia Circuit

Mr. Shoaff agrees to be subject to the jurisdiction and rules of the Commission and the Kentucky Bar Association, and further will associate with undersigned counsel Joe Childers, a member of the Kentucky Bar Association, for the duration of this proceeding.

Attached please find an invoice for the approved, confirming payment of \$317.75 for Mr. Shoaff, pursuant to Kentucky Supreme Court Rule 3.030. Mr. Shoaff's Kentucky *pro hac vice* number is PH36017508.

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

Dated: October 30, 2024

Respectfully submitted,



---

Joe F. Childers, Esq.  
Childers & Baxter PLLC  
201 West Short Street  
Lexington, KY 40507  
Phone: (859) 253-9824  
Fax: (859) 258-9288  
[joe@jchilderslaw.com](mailto:joe@jchilderslaw.com)



---

Nathaniel T. Shoaff  
Sierra Club  
2101 Webster Street, Suite 1300  
Oakland, CA 94612  
[nathaniel.shoaff@sierraclub.org](mailto:nathaniel.shoaff@sierraclub.org)

*Counsel for Sierra Club*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of SIERRA CLUB'S MOTION TO ADMIT NATHANIEL SHOAFF *PRO HAC VICE* in this action is being electronically transmitted to the Commission on October 31, 2024, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



---

JOE F. CHILDERS