

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

IN THE MATTER OF: )  
)  
)  
ELECTRONIC APPLICATION OF EAST )  
KENTUCKY POWER COOPERATIVE, INC. )  
FOR 1) A CERTIFICATE OF PUBLIC )  
CONVENIENCE AND NECESSITY TO )  
CONSTRUCT A NEW GENERATION )  
RESOURCE; 2) A SITE COMPATIBILITY )  
CERTIFICATE; AND 3) OTHER GENERAL )  
RELIEF )

CASE No. 2024-00310

---

**SIERRA CLUB’S MOTION TO SUBSTITUTE BETHANY N. BAXTER FOR JOE F. CHILDERS AS SPONSORING ATTORNEY FOR NATHANIEL SHOAFF *PRO HAC VICE***

---

Intervenor Sierra Club, by and through counsel, respectfully requests the substitution of Bethany N. Baxter for Joe F. Childers as sponsoring attorney for Nathaniel Shoaff’s *pro hac vice* admission. Ms Baxter is an attorney in good standing with the Kentucky Bar Association.

Dated: November 1, 2024

Respectfully submitted,

Bethany N. Baxter

---

Bethany N. Baxter  
Joe F. Childers  
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)

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing copy of SIERRA CLUB'S MOTION TO SUBSTITUTE BETHANY N. BAXTER FOR JOE F. CHILDERS AS SPONSORING ATTORNEY NATHANIEL SHOAFF *PRO HAC VICE* in this action is being electronically transmitted to the Commission on March 17, 2025, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

Bethany N. Baxter  
BETHANY N. BAXTER