## 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	) CASE No. 2024-00310
CONVENIENCE AND NECESSITY TO	)
CONSTRUCT A NEW GENERATION	)
RESOURCE; 2) A SITE COMPATIBILITY	)
CERTIFICATE; AND 3) OTHER GENERAL	)
RELIEF	)
	)

## 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), as certified by his signature appearing below. 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: November 1, 2024

Respectfully submitted,

pr + Cluber

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

N. 1 . 1 . 1 . T. C1 . . CC

Nathaniel T. Shoaff

Not Should

Sierra Club

2101 Webster Street, Suite 1300

Oakland, CA 94612

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 November 1, 2024, and there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

JOE F. CHILDERS

pr + Cluber