# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST
KENTUCKY POWER COOPERATIVE, INC. FOR
1) CERTIFICATES OF PUBLIC CONVENIENCE
AND NECESSITY TO CONSTRUCT A NEW
GENERATION RESOURCES; 2) FOR A SITE
COMPATIBILITY CERTIFICATE RELATING TO
THE SAME; 3) APPROVAL OF DEMAND SIDE
MANAGEMENT TARIFFS; AND 4) OTHER
GENERAL RELIEF

CASE NO. 2024-00370

## MOTION OF APPALACHIAN CITIZENS' LAW CENTER, KENTUCKIANS FOR THE COMMONWEALTH, AND MOUNTAIN ASSOCIATION ADMIT CASSANDRA McCRAE PRO HAC VICE

Come now Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Mountain Association (collectively "Joint Intervenors"), 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 following bars:

- State Bar of Texas (Bar No. 24094830);
- State Bar of Pennsylvania (Bar No. 325253); and
- 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,

Of counsel (not licensed in Kentucky):

Cassandra McCrae Earthjustice 1617 JFK Blvd., Ste. 2020 Philadelphia, PA 19103 (215) 671-6493 cmccrae@earthjustice.org Byron L. Gary
Ashley Wilmes
Kentucky Resources Council
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(502) 875-2428
Byron@kyrc.org
Ashley@kyrc.org

Counsel for Joint Intervenors Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Mountain Association

#### 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 February 13, 2025; that the documents in this electronic filing are a true representation 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





### **Invoice**

Date	Invoice #	
2/3/2025	200121043	

Bill To

Cassandra McCrae
Earthjustice
657 W Kingsley St
Philadelphia, PA 19144
United States

Recipient Information

Cassandra McCrae
Earthjustice
657 W Kingsley St
Philadelphia, PA 19144
United States

Terms	Due Date
Due on receipt	2/3/2025

Date	Qty	Description	Price	Totals
2/3/2025	1	Pro Hac Fee (Amount includes a 2.50% Administrative Processing Fee)	\$317.75	\$317.75
Sub-Total		\$317.75		
			Total	\$317.75

# Payments/Refunds

Date	Qty	Description	Price	Totals
2/3/2025	1	Payment via Credit Card (using card xxxxxxxxxxx8617) Applied to invoice on 2/3/2025 4:49:51 PM	(\$317.75)	(\$317.75)
	Total Payments/Refunds		(\$317.75)	
Balance Due			\$0.00	

#### Comments:

The Kentucky Bar Association certifies that Cassandra McCrae has paid the per-case fee of \$310.00 on 2/3/2025 for the Kentucky Public Service Commission Case #2024-00370 as required in SCR 3.030(2). Pro Hac Vice #PH29922777