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) CASE NO. 2024-00370
COMPATIBILITY CERTIFICATE RELATING TO THE)
SAME; 3) APPROVAL OF DEMAND SIDE)
MANAGEMENT TARIFFS; AND 4) OTHER)
GENERAL RELIEF	

JOINT INTERVENORS' MOTION FOR LEAVE TO ALLOW WITNESS MARIA ROUMPANI TO TESTIFY REMOTELY

Come now Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Mountain Association, (collectively "Joint Intervenors", "JIs" or "Movants") by and through counsel, and respectfully move the Kentucky Public Service Commission ("Commission") to allow Maria Roumpani to testify virtually at the hearing in this case, currently scheduled for April 21-23, 2025. In support of this motion, Joint Intervenors state the following:

1. On February 14, 2025, Joint Intervenors submitted Witness Roumpani's verified written direct testimony to the record of this proceeding. Witness Roumpani's testimony addresses East Kentucky Power Cooperative's application for approval of a Demand Side Management plan that continues certain existing programs, while proposing adjustments to others and the addition of four new programs.

- Witness Roumpani further provided certain verified responses to data requests from East Kentucky Power Cooperative, filed to the record of this proceeding on March 17, 2025.
- 3. A hearing in this matter is currently scheduled for three days, beginning on the Monday immediately following Easter Sunday, April 21-23, 2025.
- 4. Joint Intervenors request leave for Witness Roumpani to appear remotely at the hearing in light of scheduling challenges and closeness of the hearing to Easter Sunday. As a Principal at Current Energy Group, Witness Roumpani is presently involved in a number of matters, including appearing as a witness in a hearing before the Virginia State Corporation Commission, presently scheduled for April 15-17, and also several filing- and project-related deadlines before month's end. These demands make appearing in-person more challenging than anticipated, and in all likelihood would result in Witness Roumpani being apart from her family out of state over the Easter weekend.
- 5. Witness Roumpani is capable of providing testimony remotely and participation in this manner will not prejudice any party.
- 6. Witness Roumpani has previously testified remotely in proceedings before state regulators in South Carolina, Colorado, and Nevada without issue.

¹ Public Service Commission of South Carolina, Docket Nos. 2023-1-E, 2023-2-E, and 2023-8-E.

² Colorado Public Utilities Commission, Docket No. 21A-0141E.

³ Public Utilities Commission of Nevada, Docket No. 24-05041.

7. Witness Liz Stanton, a second witness sponsoring testimony on behalf of Joint Intervenors in this proceeding, anticipates being available to participate in the hearing in-person.

WHEREFORE, Joint Intervenors Appalachian Citizens' Law Center, Kentuckians for the Commonwealth, and Mountain Association, by and through counsel, respectfully ask the Commission to allow Witness Roumpani to testify virtually at the hearing in this case, currently scheduled for April 21-23, 2025.

[Signatures on following page]

Respectfully Submitted,

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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 April 14, 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