#### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

ln	the	Ma	tter	of:

MAY 25 2010
PUBLIC SERVICE
COMMISSION

THE JOINT APPLICATION OF PPL	)	COMM
CORPORATION, E.ON AG, E.ON	j	
U.S. LLC, LOUISVILLE GAS AND	)	CASE NO. 2010-00204
ELECTRIC COMPANY AND	)	
KENTUCKY UTILITIES COMPANY	)	
FOR APPROVAL OF AN	)	
ACQUISITION OF OWNERSHIP	)	
AND CONTROL OF UTILITIES	-	

# MOTION TO ADMIT PAUL E. RUSSELL PRO HAC VICE

Richard Northern, an attorney licensed to practice in the Commonwealth of Kentucky, hereby moves the Commission on behalf of PPL Corporation ("PPL") to admit Paul E. Russell to practice law before the Commission *pro hac vice*, in the above-captioned proceeding.

Paul E. Russell is Associate General Counsel for PPL. The applicant's business address is Two North Ninth Street, Allentown, PA 18101. Further, Paul E. Russell, having been admitted in 1975, is a member in good standing with the bar of the state of Pennsylvania, Registration No. 21643, and has never been suspended, disbarred or resigned as a result of disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction. No disciplinary proceeding has ever been filed against Paul E. Russell nor is any presently pending against him in any jurisdiction. In connection with this proceeding, Paul E. Russell agrees to be subject to the rules of the Commission and the Kentucky Bar Association. An affidavit executed by Paul E. Russell attesting to these facts is attached hereto.

Further, attached please find the original Kentucky Bar Association Out-Of-State Certification on behalf of Paul E. Russell, indicating Paul E. Russell's compliance with Supreme Court Rule 3.030(2).

WHEREFORE, PPL Corporation, through counsel, specifically requests the Commission to grant its motion to allow Paul E. Russell to appear and practice before it in the above-entitled matter *pro hac vice*.

Respectfully submitted:

Richard Northern

WYANT, TARRANT & COMBS, LLP 500 West Jefferson Street, Suite 2800

Louisville, KY 40202

Phone:

502-562-7234

Fax: 502-589-0309 rnorthern@wyattfirm.com

# **AFFIDAVIT OF COUNSEL**

COMMONWEALTH OF PENNSYLVANIA	)
	)
COUNTY OF LEHIGH	)

Affiant, Paul E. Russell, employed by PPL Services Corporation on behalf of PPL Corporation, and who being first duly sworn, deposes and states as follows:

- (1) I submit this Affidavit of Counsel to the Kentucky Public Service Commission in connection with my request to be admitted to practice Pro Hac Vice before the Commission in Case No. \_\_2010-00204\_\_\_.
- (2) I was admitted to the bar of the Commonwealth of Pennsylvania in 1975, Registration No. 21643, am a member in good standing with the bar of that state, and have never been suspended, disbarred or resigned as a result of disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction. No disciplinary proceedings have ever been filed against me, nor are any presently pending against me in any jurisdiction.
- (3) I agree to be subject to the rules of the Commission and the Kentucky Bar Association in connection with the proceedings before the Public Service Commission in Case No. 2010–00204 . In accordance with Supreme Court Rule 3.030(2), I agree to have a member of the Kentucky Bar Association present with me as co-counsel during the hearing in Case No. 2010–00204 and at all other times required by the Commission.
- (4) I respectfully request that this Court grant this Motion and allow me to appear as counsel of record in the instant matter. I will be assisted in this matter by Richard Northern, Esq., who maintains an office in this Commonwealth, and who is admitted to practice in Kentucky.

- (5) I have complied with Supreme Court Rule 3.030(2), and hereby attach a copy of the Kentucky Bar Association Out-Of-State Certification provided by the Kentucky Bar Association to me for this proceeding.
- (6) Under penalties of perjury, I declare that I have read the foregoing Motion to Admit Paul E. Russell *Pro Hac Vice* and Affidavit of Counsel and that the facts stated therein are true.

Respectfully submitted this <u>21st</u> day of May, 2010.

	r dar Er radoon
COMMONWEALTH OF PENNSYLVANIA	) ) :SS
COUNTY OF LEHIGH	)

The foregoing instrument was subscribed, sworn to and acknowledged before me this  $2l^{st}$  day of May, 2010, by Paul E. Russell.

My commission expires: July 10, 2012

NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal Deborah A. Muhr, Notary Public City of Allentown, Lehigh County My Commission Expires July 16, 2012

# KENTUCKY BAR ASSOCIATION

**OFFICERS**Charles E. English, Jr. **President** 

Bruce K. Davis President-Elect

Margaret E. Keane Vice President

Barbara D. Bonar Past President

YOUNG LAWYERS Jennifer Howard Moore Chair

**EXECUTIVE DIRECTOR** John D. Meyers

COURT

514 WEST MAIN STREET FRANKFORT, KENTUCKY 40601-1812 (502) 564-3795 FAX (502) 564-3225 www.kybar.org



#### **BOARD OF GOVERNORS**

Douglas C. Ballantine
Anita M. Britton
Douglass Farnsley
Jonathan Freed
Fred E. Fugazzi, Jr.
James D. Harris, Jr.
Richard W. Hay
David V. Kramer
W. Douglas Myers
Thomas L. Rouse
Bobby Rowe
R. Michael Sullivan
William H. Wilhoit
M. Gail Wilson

# KENTUCKY BAR ASSOCIATION OUT-OF-STATE CERTIFICATION FORM

CASE NO.

2010-00204

Kentucky Public Service Commission

SCR 3.030 Membership, practice by nonmembers and classes of membership  (2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$100.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee.
The Kentucky Bar Association certifies that Paul E. Russell has paid the per case fee of \$100.00 in the above referenced case as required in SCR 3.030(2).
Medaky
Nicole A. Key, Deputy Registrar