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December 14, 2011

Jeff Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Blvd.  
Frankfort, Kentucky 40601

DEC 15 2011  
PUBLIC SERVICE  
COMMISSION

In re: Case #2011-00375, Proposed Intervenors' Motion to Admit *Pro Hac Vice*

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Dear Mr. Derouen,

Please accept and file the enclosed motion by Sierra Club and Natural Resources Defense Council; I have included the original and ten copies. There is a proposed order for the Commission's consideration as well. Of course, if you have any questions, please do not hesitate to call, email, or write. Thank you, and have an excellent day.

Best Regards,



Edward George Zuger III, Esq.  
Zuger Law Office  
P.O. Box 728  
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*enclosures*

*cc: Parties*

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

**In the Matter of:**

**Joint Application Of Louisville Gas And Electric Company     )  
and Kentucky Utilities Company for Certificates of Public     )  
Convenience and Necessity for the Construction of a Combined)  
Cycle Combustion Turbine at the Cane Run Generating     ) CASE NO. 2011-00375  
Station and the Purchase of Existing Simple Cycle Combustion )  
Turbine Facilities from Bluegrass Generation Company, LLC )  
in LaGrange, Kentucky     )**

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**MOTION TO ADMIT PRO HAC VICE BY SIERRA CLUB AND  
THE NATURAL RESOURCES DEFENSE COUNCIL**

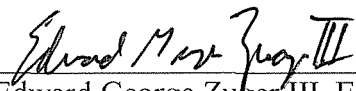
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COMES NOW Proposed Intervenors Sierra Club, and the Natural Resources Defense Council, by and through counsel, and hereby seek to have admitted to practice law in Kentucky, for the limited purpose of this matter, Hon. Shannon Fisk (IL Bar No. 6269746) and Hon. Kristin Henry (CA Bar No. 220908) pursuant to Kentucky Supreme Court Rule 3.030.

The undersigned understands that the Commission may only grant Intervenors' request once the Kentucky Bar Association (KBA) has certified out-of-state counsel admissions, and he will deposit those certifications—currently in process—with the Commission upon receipt by the KBA.

Dated: December 14, 2011

Respectfully submitted,

  
\_\_\_\_\_  
Edward George Zuger III, Esq.  
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(606) 416-9474

Of counsel:  
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#### CERTIFICATE OF SERVICE

I certify that I mailed a copy of this MOTION TO ADMIT PRO HAC VICE by first class mail on December 14, 2011 to the following:

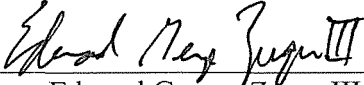
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Frankfort, KY 40601-8204

Hon. Michael L. Kurtz  
Hon. Kurt J. Boehm  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202

  
Edward George Zuger III, Esq.  
*Counsel for Movant*

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS	)	
AND ELECTRIC COMPANY AND KENTUCKY	)	CASE NO.
UTILITIES COMPANY FOR A CERTIFICATE OF	)	2011-00375
PUBLIC CONVENIENCE AND NECESSITY AND	)	
SITE COMPATIBILITY CERTIFICATE FOR THE	)	
CONSTRUCTION OF A COMBINED CYCLE	)	
COMBUSTION TURBINE AT THE CANE RUN	)	
GENERATING STATION AND THE PURCHASE	)	
OF EXISTING SIMPLE CYCLE COMBUSTION	)	
TURBINE FACILITIES FROM BLUEGRASS	)	
GENERATION COMPANY, LLC IN LAGRANGE,	)	
KENTUCKY	)	

ORDER

On December 15, 2011, Edward George Zuger III, an attorney licensed to practice law in the Commonwealth of Kentucky, who is representing Intervenors Sierra Club and the Natural Resources Defense Counsel, moved the Commission to admit *pro hac vice* Kristin Henry, an attorney whose office is in the state of California, and Shannon Fisk, an attorney whose office is in the state of Illinois, to practice law before the Commission on behalf of Intervenors Sierra Club, and the Natural Resources Defense Counsel in this case. In support of the request, Kristin Henry and Shannon Fisk have shown that they are members in good standing of another state bar and have been certified to practice before the Commission in this case by the Kentucky Bar Association under Supreme Court Rule 3.030(2). In addition, Kristin Henry and Shannon Fisk have agreed to be subject to the jurisdiction and rules of the Commission and the Kentucky Bar Association.

IT IS THEREFORE ORDERED that Kristin Henry and Shannon Fisk are admitted *pro hac vice* for the purpose of representing Intervenors Sierra Club, and the Natural Resources Defense Counsel in the above-styled proceeding provided that Edward George Zuger III, Zuger Law Office, P. O. Box 728, Corbin, Kentucky 40702, or another member of the Kentucky Bar Association, acts as co-counsel and is present at any and all proceedings before this Commission.

By the Commission

ATTEST:

\_\_\_\_\_  
Executive Director