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May 14, 2019

VIA FEDERAL EXPRESS DELIVERY

Executive Director Earl Taylor
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, TN 37243

RE: **Petition of Kentucky Utilities Company for (1) An Order Authorizing Kentucky Utilities Company to Abandon Its Service Area in Tennessee and to Withdraw Its Tariff for Electric Service and (2) An Order Declaring that Kentucky Utilities is No Longer a Public Utility Under Tennessee Law and No Longer Subject to Tennessee Public Utility Commission Regulation**
Docket No. 19-00001

Dear Mr. Taylor:

Enclosed please find for filing on behalf of Kentucky Utilities Company the original and four (4) copies of a *Motion to Allow Witness to Appear and Participate at Hearing by Telephone*.

Should you have any questions or need any additional information, please contact me at your convenience.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Kendrick R. Riggs', is written over a horizontal line.

Kendrick R. Riggs

KRR:ec

Enclosures

cc: Monica Smith-Ashford, Deputy General Counsel, TN Public Utility Commission (w/ encl.)
Allyson K. Sturgeon, Managing Senior Counsel, Regulatory and Transactions (w/o encl.)

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

NASHVILLE, TENNESSEE

PETITION OF KENTUCKY UTILITIES)	
COMPANY FOR (1) AN ORDER)	
AUTHORIZING KENTUCKY UTILITIES)	
COMPANY TO ABANDON ITS SERVICE AREA)	
IN TENNESSEE AND TO WITHDRAW ITS)	Docket No. 19-00001
TARIFF FOR ELECTRIC SERVICE AND (2) AN)	
ORDER DECLARING THAT KENTUCKY)	
UTILITIES IS NO LONGER A PUBLIC)	
UTILITY UNDER TENNESSEE LAW AND NO)	
LONGER SUBJECT TO TENNESSEE PUBLIC)	
UTILITY COMMISSION REGULATION)	

**MOTION TO ALLOW WITNESS
TO APPEAR AND PARTICIPATE AT HEARING BY TELEPHONE**

The Petition of Kentucky Utilities Company (“KU” or the “Company”) in the above-captioned matter is scheduled to be heard at the Tennessee Public Utility Commission’s (“Commission”) Agenda Conference at 1:00 P.M. (CDT) on May 20-21, 2019.

Pursuant to T.C.A. §4-5-312(c), KU submits this *Motion to Allow Witness to Appear and Participate at Hearing by Telephone* (“Motion”). As grounds for its Motion, KU states as follows: T.C.A. §4-5-312(c) addresses electronic participation and reads:

In the discretion of the administrative judge or hearing officer and agency members and by agreement of the parties, all or part of the hearing may be conducted by telephone, television or other electronic means, if each participant in the hearing has an opportunity to participate in, to hear, and, if technically feasible, to see the entire proceedings while taking place.

Pursuant to this statute, KU respectfully requests that its witness be allowed to participate in the hearing on its Petition via telephone. KU’s corporate offices and the business office of KU’s witness in this matter, Robert M. Conroy, Vice President – State Regulation and Rates, are located in Louisville, Kentucky. Mr. Conroy can appear at and participate by telephone conference in the Commission’s Agenda Conference, and offer a summary of his testimony and

answer any questions without prejudice to the Commission's consideration of KU's Petition. There are no other participants in this proceeding. Under these circumstances the travel time for the witness is burdensome and inefficient.

If the Motion is granted, KU agrees that the appearance and participation of its witness by telephone will be subject to the following conditions:

1. KU shall be required to secure a licensed Notary Public in good standing in the Commonwealth of Kentucky (the jurisdiction where the testimony is to be given) who will be in the same physical location with Mr. Conroy while he is providing testimony.

2. The Notary Public obtained by KU shall request the witness to provide verifiable identification for purpose of providing sworn testimony via telephone at the hearing before the Tennessee Public Utility Commission.

3. The Notary Public obtained by KU shall be duly authorized to administer the testimonial oath and shall administer such oath during the hearing and remain physically present with the witness at all times during the witness's testimony and until the witness is excused from examination by the Commission or Hearing Officer.

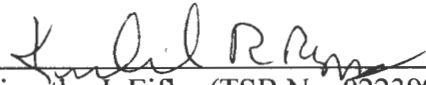
4. After the hearing, the Notary Public shall prepare and sign an affidavit, which bears the official seal of the Notary Public, affirming: (1) the proven identity of the witness, (2) the fact that the Notary Public properly administered the testimonial oath to such person, and (3) that the testimony given by the sworn witness was in accordance with ethical and legal standards, as observed by the Notary Public. In addition, the testifying witness shall sign a conforming Witness Certification in the form attached hereto or in such other format ordered by the Commission.

5. The original Witness Certification and Notary Public Affidavit shall be postmarked within five days of the hearing and received by the Commission's Docket Manager via postage-paid U.S. Mail or other courier.

WHEREFORE, Kentucky Utilities Company respectfully requests that the Commission enter an Order granting KU's Motion to allow its witness Robert M. Conroy, Vice President – State Regulation and Rates, to participate by telephone in the Commission Conference scheduled for May 20-21, 2019.

Dated: May 14, 2019

Respectfully submitted,



Timothy J. Eifler (TSB No. 022399)
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Counsel for Kentucky Utilities Company

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WITNESS CERTIFICATION

I attest and certify that I provided testimony via telephone before the Tennessee Public Utility Commission at the hearing on the date referenced below. I have read the Affidavit below and further acknowledge and agree that the testimony I provided proceeded as stated therein.

Date of Hearing

ROBERT M. CONROY

AFFIDAVIT

Affiant, after first being duly sworn according to law, deposes and states as follows:

1. I am _____, a Notary Public in good standing in the Commonwealth of Kentucky, County of Jefferson. All statements set out in this Affidavit are made of my own personal knowledge.

2. My business address and telephone number where I may be contacted are:

3. Robert M. Conroy ("Witness") personally appeared before me and provided _____ (type of identification) which I

verified, on the _____ day of May, 2019 for the purpose of providing sworn testimony via telephone at a hearing before the Tennessee Public Utility Commission.

4. During the hearing on the record, I administered the oath to the Witness prior to the Witness providing testimony via telephone before the Tennessee Public Utility Commission.

5. I remained physically present with the Witness at all times during the Witness's testimony and until such Witness was excused from examination by the Commissioners of the Tennessee Public Utility Commission who heard the case.

6. The testimony I observed being given by the Witness was in accordance with the applicable ethical and legal standards.

WITNESS my hand, at office, this _____ day of May, 2019

My Commission Expires: _____

NOTARY PUBLIC, STATE AT LARGE