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COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

JUL 06 2011

PUBLIC SERVICE COMMISSION

In The Matter Of: Application of Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity) Case No. 2011-00162 and Approval of its 2011 Compliance Plan for Recovery by Environmental Surcharge

PETITION FOR FULL INTERVENTION OF THE UNITED STATES DEPARTMENT OF DEFENSE AND OTHER FEDERAL EXECUTIVE AGENCIES

Pursuant to K.R.S. Section 278.310 and 807 KAR 5:00l Section 3(8), the United States Department of Defense and Other Federal Executive Agencies ("DOD/FEA"), by and through its duly authorized legal counsel, hereby files this Petition For Full Intervention in the above-captioned proceeding. In support of this Petition, DOD/FEA states:

1. DOD/FEA operates several major military and civilian installations and facilities in the service area of Louisville Gas And Electric Company ("LG&E") including, most notably, Fort Knox. Currently, Fort Knox alone pays LG&E over \$10,000,000 annually for electricity service. In view of the large increase requested by LG&E, the outcome of this proceeding will have substantial and significant impact on Fort Knox and the other affected Federal installations and facilities. The special interests of DOD/FEA cannot be adequately represented by any other party to this proceeding and DOD/FEA's full participation is likely to assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

Accordingly, DOD/FEA should be granted full intervenor status.

2. DOD/FEA's attorneys, to whom all communications and pleadings should be addressed, are:

Scott E. Handley, Esq.
Administrative Law Division
Office of the Staff Judge Advocate
50 Third Avenue, Room 215
Fort Knox, KY 40121-5000
Telephone: 502-624-7414

E-mail: scott.handley1@ us. army.mil

and

Robert A. Ganton, Esq. Regulatory Law Office U.S. Army Legal Services Agency 901 N. Stuart Street, Suite 525 Arlington, VA 22203-1 837 Telephone: 703-696-1 645

E-Mail: robert.ganton@us.army.mil

WHEREFORE, DOD/FEA respectfully requests that it be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,

Scott E. Handley, Esq.

Kentucky Bar Association ID: 86646

Administrative Law Division

Office of the Staff Judge Advocate

50 Third Avenue, Room 215 Fort Knox, KY 40121 -5000

COUNSEL FOR THE UNITED STATES
DEPARTMENT OF DEFENSE
AND OTHER FEDERAL EXECUTIVE AGENCIES

Dated: July 5, 2011

DEPARTMENT OF THE ARMY

HEADQUARTERS, US ARMY ARMOR CENTER AND FORT KNOX BUILDING 1310, 50 THIRD AVENUE, SUITE 229 FORT KNOX KENTUCKY 40121-5230

July 1, 2011

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Blvd. Frankfort, Kentucky 40602

SUBJECT: In the Matter of: Application of Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Approval of its 2011 Compliance Plan for Recovery by Environmental Surcharge

Case No. 2011-00162

Dear Mr. Derouen:

Enclosed for filing in the subject proceeding are the original and twelve copies of the **Petition for Full Intervention of the United States Department of Defense and other Federal Executive Agencies** ("DOD/FEA"). Please contact me if there are any questions regarding this filing.

Copies of the Petition have been sent to all parties of record.

Sincerely.

Scott E. Handley, Esq.

Kentucky Bar Association ID: 86646

Administrative Law Division

Office of the Staff Judge Advocate

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Telephone: 502-624-741 4

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Enclosures

CC: Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petition for Full Intervention by the United States Department of Defense and other Federal Executive Agencies was served on the following parties on the day of July 2011 by United States Mail, postage prepaid.

Scott E. Handley, Esq.

Honorable Dennis G Howard II
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