

DEPARTMENT OF THE ARMY

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

March 9, 2010

VIA UPS

RECEIVED

MAR 10 2010

PUBLIC SERVICE COMMISSION

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 an Adjustment of Base, Case No. 2009-00549

Dear Mr. Derouen:

Enclosed please find for filing in the subject proceeding are the original and twelve copies of the Amended Motion 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,

Steven A. Edwards, Esq.

Kentucky Bar Association ID: 81259

Administrative Law Division

Office of the Staff Judge Advocate

1310 Third Avenue, Room 215

Fort Knox, KY 40121-5000 Telephone: 502-624-7414

Facsimile: 502-624-0997

E-mail: steven.edwards3@us.army.mil

Enclosures

CC: Parties of Record



COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:) Case No. 2009-00549
Application Of Louisville Gas And Electric Company For An Adjustment of Base Rates	PECEIVED
	MAR 10 2010
	PUBLIC SERVICE COMMISSION
AMENDED MOTION FOR FULL INTERVENTION OF THE UNITED STATES DEPARTMENT OF DEFENSE AND OTHER FEDERAL EXECUTIVE AGENCIES	

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 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 Amended Motion For Full Intervention in the above-captioned proceeding. This Amended Motion is being filed to provide the addition of counsel admitted to practice in the Commonwealth of Kentucky. The original Motion was received by the Commission on February 24, 2010. In support of this Motion, 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 under a "special contract" for electricity service. In view of the large rate increase requested by LG&E, the outcome of this proceeding will therefore 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:

Steven A. Edwards, Esq. Administrative Law Division Office of the Staff Judge Advocate 1310 Third Avenue, Room 215 Fort Knox, KY 40121-5000 Telephone: 502-624-7414

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and

Robert A. Ganton, Esq. Regulatory Law Office U.S. Army Legal Services Agency 901 N. Stuart Street, Suite 525 Arlington, VA 22203-1837

Telephone: 703-696-1645 Facsimile: 703-696-2960

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,

Steven A. Edwards, Esq.

Kentucky Bar Association ID: 81259

Administrative Law Division

Office of the Staff Judge Advocate

1310 Third Avenue, Room 215

Fort Knox, KY 40121-5000

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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Amended Motion for Full Intervention by the United States Department of Defense and other Federal Executive Agencies was served on the following parties on the 8th day of March 2010 by United States mail, postage prepaid.

Steven A. Edwards, Esq.

Honorable Dennis G Howard II Assistant Attorney General Office of the Attorney General Utility & Rate 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204

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