

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

IN THE MATTER OF:

APPLICATION OF LOUISVILLE GAS & ELECTRIC
COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC
AND GAS RATES AND FOR CERTIFICATES OF
PUBLIC CONVENIENCE AND NECESSITY

Case No. 2016-00371

MOTION TO INTERVENE
OF THE UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER
FEDERAL EXECUTIVE AGENCIES

Pursuant to K.R.S. § 278.310 and 807 KAR 5:001, Section 4(11), the United States Department of Defense and all other Federal Executive Agencies (“DoD/FEA”), by and through its legal counsel, hereby requests that it be granted leave to intervene in the above captioned matter, and in support thereof states:

1. DoD/FEA operates Fort Knox in the State of Kentucky. This installation is a large user of electric power and gas and is served, in part, by Louisville Gas & Electric (“LG&E”). Electric power and natural gas are major expenses for Fort Knox and this proceeding will have a significant impact on DoD/FEA. Accordingly, DoD/FEA’s interests are greatly affected by the decision of the Kentucky Public Service Commission and cannot be adequately represented by any other party. If allowed to intervene, DoD/FEA will present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

2. The attorneys authorized to represent DoD/FEA in this proceeding and take service of all documents are:


Lead Counsel: Emily W. Medlyn
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3. Emily W. Medlyn has complied with the requirements of SCR 3.030(2), and in conformance with 807 KAR 5:001, proof of compliance is attached hereto as Exhibit "A." Local co-counsel's contact information is provided above.

WHEREFORE, the United States Department of Defense and all other Federal Executive Agencies requests that it be granted leave to intervene as a full party in this proceeding, with all rights attendant to full party status.

Respectfully submitted,



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November 18, 2016

CERTIFICATE OF SERVICE

It is hereby certified that the attached Motion to Intervene is a true and accurate copy of the document being filed with the Commission in paper medium; that the filing was transmitted to the Commission via electronic and Federal Express on November 18, 2016; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that a copy of the filing was served electronically on the following persons on this 18th day of November 2016.

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