

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

IN THE MATTER OF: APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES	Case No. 2018-00294
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PETITION 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 has a substantial interest in this proceeding because it owns and operates numerous facilities and buildings, including Blue Grass Army Depot, within Kentucky Utilities Company's territory. DoD/FEA is a large user of electric power and is served, in part, by Kentucky Utilities Company. Electric power is a major expense for DoD/FEA 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 Federal Property and Administrative Services Act, 40 U.S.C. § 501(c) authorizes the United States General Services Administration ("GSA") to represent consumer interests of the

Federal Executive Agencies in proceedings before state regulatory bodies. Furthermore, GSA may delegate to DoD the authority to represent all Federal Executive Agencies in a proceeding involving a public utility before a regulatory body when DoD and GSA agree that representation by DoD is in the best interests of the Federal Government. 15 FR 8227 (3)(k)(2) (1950).

3. 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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4. 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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