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
   General Attorney
   U.S. Army Legal Services Agency
   Regulatory Law Office (JALS-RL/IP)
   9275 Gunston Road
   Fort Belvoir, Virginia 22060-4446
   Telephone: (703) 614-3918
   Facsimile: (703) 806-0123
   Email: emily.w.medlyn.civ@mail.mil

   **Local Counsel:**
   
   G. Houston Parrish
   Labor Law Attorney
   Office of the Staff Judge Advocate
   Building 1310, Room 218
   50 3rd Avenue
   Fort Knox, Kentucky 40121-5230
   Telephone: (502) 624-1003
   Facsimile: (502) 624-2488
   glenn.h.parrish.civ@mail.mil

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.