

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

IN THE MATTER OF: ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES, A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO DEPLOY ADVANCED METERING INFRASTRUCTURE, APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS, AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT

**Case No. 2020-00349**

IN THE MATTER OF: ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES, A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO DEPLOY ADVANCED METERING INFRASTRUCTURE, APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS, AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT

**Case No. 2020-00350**

**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 matters, 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 (“KU”) territory and Fort Knox within Louisville Gas & Electric Company’s

("LG&E") territory. DoD/FEA is a large user of electric power and gas. Electric power and natural gas are major expenses for DoD/FEA and these proceedings 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 another party cannot adequately represent the interests of federal customers. 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 these proceedings and take service of all documents are:

Lead Counsel: Emily W. Medlyn  
General Attorney  
U.S. Army Legal Services Agency  
ELD Division  
9275 Gunston Road  
Fort Belvoir, Virginia 22060-4446  
Telephone: (703) 614-3918  
Facsimile: (703) 806-0900  
Email: [emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)

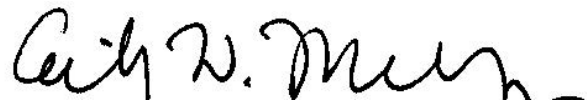
Local Counsel: G. Houston Parrish  
Labor Law Attorney  
Office of the Staff Judge Advocate  
Building 1310, Room 218  
50 3rd Avenue  
Fort Knox, Kentucky 40121-5230

Telephone: (502) 624-1003  
Facsimile: (502) 624-2488  
[glenn.h.parrish.civ@mail.mil](mailto: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" and "B." 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 these proceedings, with all rights attendant to full party status.

Respectfully submitted,

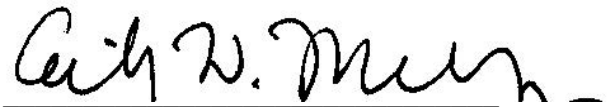


Emily W. Medlyn  
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U.S. Army Legal Services Agency  
ELD Division  
9275 Gunston Road  
Fort Belvoir, Virginia 22060-4446  
Telephone: (703) 614-3918  
Facsimile: (703) 806-0900  
Email: [emily.w.medlyn.civ@mail.mil](mailto:emily.w.medlyn.civ@mail.mil)

December 18, 2020

**CERTIFICATE OF SERVICE**

It is hereby certified that the attached Petition 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 filing on December 10, 2020; 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 all persons listed in the Official Service List for Docket 2020-00349 and Docket 2020-00350 on this 18<sup>th</sup> day of December 2020.

A handwritten signature in black ink, appearing to read "Emily W. Medlyn", written over a horizontal line.

Emily W. Medlyn



**Kentucky Bar Association**  
514 West Main Street  
Frankfort, KY 40601 -1812  
(502) 564-3795

**PAID**

## Invoice

Date	Invoice #
12/14/2020	200060454

Bill To	Recipient Information
Emily Medlyn [REDACTED] United States	Emily Medlyn USALSA 9275 Gunston Road Ft Belvoir, VA 22060 United States

Terms	Due Date
Due on receipt	12/14/2020

Date	Qty	Description	Price	Totals
12/14/2020	1	Pro Hac Fee (Amount includes a 2.50% Administrative Processing Fee)	\$317.75	\$317.75
			<b>Sub-Total</b>	\$317.75
			<b>Total</b>	\$317.75

## Payments/Refunds

Date	Qty	Description	Price	Totals
12/14/2020	1	Payment via Credit Card (using card [REDACTED]) <i>Applied to invoice on 12/14/2020 4:32:40 PM</i>	(\$317.75)	(\$317.75)
			<b>Total Payments/Refunds</b>	(\$317.75)
			<b>Balance Due</b>	\$0.00

### Comments:

The Kentucky Bar Association certifies that Emily W. Medlyn has paid the per-case fee of \$310.00 on December 14, 2020 for the Kentucky Public Service Commission Case #2020-00349 as required in SCR 3.030(2).  
Pro hac vice #20597

EXHIBIT "A"



**Kentucky Bar Association**  
 514 West Main Street  
 Frankfort, KY 40601 -1812  
 (502) 564-3795

**PAID**

**Invoice**

Date	Invoice #
12/14/2020	200060456

Bill To
Emily Medlyn [REDACTED] United States

Recipient Information
Emily Medlyn 9275 Gunston Road Suite 4300 (ELD) Fort Belvoir, VA 22060 United States

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			<b>Total</b>	\$317.75

**Payments/Refunds**

Date	Qty	Description	Price	Totals
12/14/2020	1	Payment via Credit Card (using card [REDACTED]) <i>Applied to invoice on 12/14/2020 4:38:33 PM</i>	(\$317.75)	(\$317.75)
			<b>Total Payments/Refunds</b>	(\$317.75)
			<b>Balance Due</b>	\$0.00

**Comments:**

The Kentucky Bar Association certifies that Emily W. Medlyn has paid the per-case fee of \$310.00 on December 14, 2020 for the Kentucky Public Service Commission Case #2020-00350 as required in SCR 3.030(2).  
 Pro hac vice #20597

EXHIBIT "B"