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**PUBLIC SERVICE
COMMISSION**

**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, AND APPROVAL OF CERTAIN)	CASE NO. 2025-00113
REGULATORY AND ACCOUNTING)	
TREATMENTS)	

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

The United States Department of Defense and all other Federal Executive Agencies (“DoD/FEA”), pursuant to K.R.S. §§ 278.310, 278.310(2), and 807 KAR 5:001, Section 4(11), by and through its attorneys, respectfully requests that the Kentucky Public Service Commission (“Commission”) permit it to intervene and become a party in the above captioned matter. In support of this Motion, DoD/FEA states as follows:

1. On May 30, 2025, Kentucky Utilities Company (“KU”) filed its Application seeking an upward adjustment of its electric rates.
2. On June 18, 2025, the Commission accepted KU’s Application and set an intervention deadline for this matter of June 25, 2025.
3. Under 807 KAR 5:001, Section 4(11)(b), the Commission shall grant leave to intervene if it finds that “a timely motion for intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her intervention is likely to present issues or to develop facts that assist the commission in fully considering the matter without unduly complicating or disrupting the proceedings.”

4. DoD/FEA has a substantial interest in this proceeding because it owns and operates facilities and buildings, including Bluegrass Army Depot and two Veterans Administration hospitals, within KU's service territory and is a large user of electric power. Electric service provided by KU is a significant expense for DoD/FEA. DoD/FEA has unique concerns as a federal entity involved in national security operations and providing medical services to veterans. Accordingly, DoD/FEA's interests are greatly affected by the decisions of the Commission and another party cannot adequately represent the interests of DoD/FEA customers. If permitted to intervene, DoD/FEA will present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating, delaying, or disrupting the proceedings.

5. Undersigned counsel has been designated as the representative, pursuant to delegation of authority from the General Services Administration and 40 U.S.C. § 501(c), for matters before the Commission involving KU.

6. The attorneys authorized to represent DoD/FEA in these proceedings and take service of all documents are:

Lead Counsel:

Kyle J. Smith
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7. DoD/FEA’s attorneys consent to electronic service in this matter.

8. Kyle J Smith is an attorney licensed in Florida and the District of Columbia and has complied with the requirements of SCR 3.030(2) and 807 KAR 5:001. Proof of compliance is attached to this Motion as Exhibit “A” and 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.

June 24, 2025

Respectfully submitted,

/s/ Kyle J Smith

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CERTIFICATE OF SERVICE

I, Kyle J Smith, representative for DoD/FEA, hereby certify that a copy of DoD/FEA's Motion to Intervene was served electronically on June 24, 2025 on the following:

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/s/ Kyle J Smith

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From: Kentucky Bar Association <No-reply-notification@affinipay.com>
Sent: Tuesday, June 24, 2025 9:14 AM
To: Smith, Kyle J CIV USARMY HQDA TJAGLCS (USA)
Subject: Payment Receipt from Kentucky Bar Association for \$317.75

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Payment Receipt

\$317.75

Kentucky Bar Association

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Account Holder

Kyle Smith
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Payment Summary

Account:	Payments	Amount Paid:	\$317.75
Reference:		Payment Method:	AMEX
Notes:	Online Store Order	Card Number:	
		Entry Mode:	Manual
		Auth Code:	108977
		Payment Date:	June 24, 2025 09:13 am
		Transaction Id:	138664800
		Payment Id:	



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Exhibit A