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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	
COMPANY FOR AN ADJUSTMENT OF ITS)	
ELECTRIC AND GAS RATES AND)	CASE NO. 2025-00114
APPROVAL OF CERTAIN 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, Louisville Gas and Electric Company ("LG&E") filed its Application seeking an upward adjustment of its electric and gas rates.
- 2. On June 18, 2025, the Commission accepted LG&E'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 Fort Knox, within LG&E's service territory and is a large user

of electric power and gas. Electric and gas service provided by LG&E are a significant expense

for DoD/FEA. DoD/FEA has unique concerns as a federal entity involved in national security

operations with privatized on-post distribution systems that interact with LG&E's transmission

and distribution systems. 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 LG&E.

6. The attorneys authorized to represent DoD/FEA in these proceedings and take

service of all documents are:

Lead Counsel:

Kyle J. Smith General Attorney U.S. Army Legal Services Agency Environmental Law Division (JALS-ELD) 9275 Gunston Road Fort Belvoir, VA 22060-4446

Fort Belvoir, VA 22060-4446 Telephone: (703) 693 -1274

Email: kyle.j.smith124.civ@army.mil

Local Counsel:

James Brannon Dupree

KY Bar #: 95885 50 Third Ave.

Building 1310 – Pike Hall Fort Knox, KY 40121

Telephone: (502) 624 – 2771

Email: james.b.dupree1.civ@army.mil

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

Kyle J. Smith General Attorney U.S. Army Legal Services Agency Environmental Law Division (JALS-ELD) 9275 Gunston Road

Fort Belvoir, VA 22060-4446 Telephone: (703) 693 -1274

Email: kyle.j.smith124.civ@army.mil

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:

Robert M. Conroy
Rick E. Lovekamp
LG&E and KU Services Company
2701 Eastpoint Parkway
Louisville, KY 40223
Robert.conroy@lg-ku.com
Rick.lovecamp@lge-ku.com

Allyson K. Sturgeon Sara V. Judd PPL Services Corporation 2701 Eastpoint Parkway Louisville, KY 40223 asturgeon@pplweb.com svjudd@pplweb.com

W. Duncan Crosby, III Stoll Keenon Ogden PLLC 400 West Market Street, Suite 2700 Louisville, KY 40202 Duncan.crosby@skofirm.com

Lindsey W. Ingram, III Stoll Keenon Ogden PLLC 300 West Vine Street, Suite 2100 Lexington, KY 40507 l.ingram@skofirm.com Lawrence W. Cook
J. Michael West
Angela M. Goad
T. Toland Lacy
John G. Horne II
Office of the Attorney General
700 Capital Avenue, Suite 20
Frankfort, KY 40601-8204
Larry.cook@ky.gov
Michael.west@ky.gov
Angela.goad@ky.gov
Thomas.lacv@ky.gov

John.horne@ky.gov

Michael L. Kurtz
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@bkllawfirm.com
jkylercohn@bkllawfirm.com

James W. Gardner
M. Todd Osterloh
Rebecca C. Price
Sturgill, Turner, Parker & Molon
333 West Vine Street, Suite 1500
Lexington, KY 40507
jgardner@sturgillturner.com
tosterloh@sturgillturner.com
price@sturgillturner.com

Carrie H. Grundmann Steven Wing-Kern Lee Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 cgrundmann@spilmanlaw.com slee@spilmanlaw.com

/s/ Kyle J Smith

Smith, Kyle J CIV USARMY HQDA TJAGLCS (USA)

Kentucky Bar Association < No-reply-notification@affinipay.com> From:

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Smith, Kyle J CIV USARMY HQDA TJAGLCS (USA) To:

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Card Number: Entry Mode: Manual

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Notes:

www.kybar.org mpogrotsky@kybar.org

Kyle Smith