## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

NOV 172010
PUBLIC SERVIO
In the Matter of: COMMISSION

## APPLICATION OF BLUE GRASS ENERGY )

 COOPERATIVE CORPORATION FOR AN ) ADJUSTMENT OF ITS SECURITY DEPOSIT )CASE NO. AND CABLE TELEVISION ATTACHMENT RATES

2010-00185

## MOTION TO EXTEND TIME FOR FILING OF AFFIDAVITS FROM PUBLISHERS

In its Order entered November 10, 2010 in the case, the Commission, at page 7, paragraph 2, ordered Blue Grass Energy to file with the Commission by December 7, 2010 Affidavits from each of the publishers verifying that the Notice described in paragraph 1 had been accomplished.

Blue Grass Energy respectfully moves the Commission to grant an extension of time beyond December 7, 2010 for Blue Grass Energy to file these Affidavits. In support thereof, Blue Grass Energy states that it has never before published notice in the 22 counties, and needs additional time in order to determine their publishing schedule, number of days "lead time" required by them, and other logistical matters. Blue Grass would respectfully request an extension at least through the month of December in order the accomplish these publications and submission of the Affidavits required.

## MOTION TO POSTPONE HEARING DATE

A hearing is scheduled for December 9, 2010, at 10:00 a.m., for consideration of Blue Grass Energy's Application for an adjustment of its security deposit and cable television rate attachment rates. Blue Grass Energy respectfully requests a postponement of this hearing date, until such time as Blue Grass Energy can accomplish the publication and submission of Affidavits, as described in paragraphs 1 and 2, page 7, of the Order entered November 10, 2010. If the present hearing date of December 9 is adhered to, then it is presumed by Blue Grass Energy that the sole issue addressed at that hearing would be cable television rates, and Blue Grass Energy would have to stand the expense of an additional Notice of Hearing at such time as the publication, and submission of Affidavits, have been accomplished relative to the security deposit issue.

For the reasons stated above, Blue Grass Energy respectfully reiterates its request that the hearing date now scheduled for December 9 be postponed, as set out hereinabove, until both issues are "ripe" for hearing. Blue Grass Energy further respectfully requests that the ultimate hearing date be set at a time which allows Blue Grass Energy sufficient time after both issues have become "ripe" to accomplish the publication required by Blue Grass Energy, of the hearing, in compliance with the time frame set out in 807KAR5:011, Section 8, Subsection 5.

## MOTION FOR INFORMAL CONFERENCE

In response to page 7, subparagraph 4, of the Commission's Order entered November 10, 2010, Blue Grass Energy respectfully requests an informal conference to
discuss its Motions set out above, its Rate Application in general, and other issues set out in paragraph 4, on page 7 of the Order.

Respectfully Submitted,


RALPH K. COMBS
Attorney at Law
100 United Drive, Suite 4B
Versailles, Kentucky 40383
859-873-5427

## CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon the following by U.S. mail postage prepaid on this the $17^{\text {th }}$ day of November, 2010. A copy was also served by facsimile to each.

Gardner F. Gillespie
Dominic F. Perella
Hogan Lovells US LLP
555 Thirteenth Street, N.W.
Washington, D.C. 20004
Laurence J. Zielke
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, Kentucky 40202-3465


