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MAY 29 2012

PUBLIC SERVICE
COMMISSION

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May 25, 2012

Mr. Jeff Derouen
Executive Director
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40602-3940

Re: Application of Kentucky Frontier Gas Company, LLC as Bankruptcy Operator of
B.T.U. Gas Company v. Harry Thompson, Thompson Energy, et al. and Other
Unknown Entities
Case No. 2012-00028

Dear Mr. Derouen:

Enclosed is an original and 10 copies of a Motion for Extension of Time and for Discovery filed on behalf of Harry Thompson, Wilon Gathering Systems, Inc. and Chattaco, Inc. Please accept these as filed with the Public Service Commission upon receipt. If I need to direct this to any other person, or if you have any questions regarding the foregoing, please let me know.

Very truly yours,

Adrian M. Mendiondo
by *gcm*

Adrian M. Mendiondo

AMM:gcm
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY FRONTIER GAS)	
COMPANY, LLC AND BANKRUPTCY)	
OPERATOR OF B.T.U. GAS COMPANY)	CASE NO.
)	2012-00028
V.)	
)	
HARRY THOMPSON, THOMPSON ENERGY)	
ET AL. AND OTHER UNKNOWN ENTITIES)	

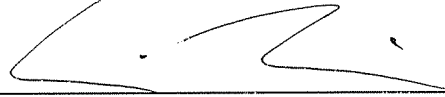
MOTION FOR EXTENSION OF TIME AND FOR DISCOVERY

Come the Respondents, Harry Thompson, Chattaco, Inc., and Wilon Gathering Systems, Inc., and respectfully move the Commission for a 14-day extension of time to provide the responses to the Commission's Request for Information dated May 21, 2012. As grounds for this request the Respondents state that it is impossible to provide the information requested in the 7 day period allotted by the Request for Information. Moreover, although the Requests purport to be issued pursuant to 807 KAR 5:001, the undersigned can find no provision of that regulation that authorizes the commission to demand the information requested, much less on a seven day deadline. Nevertheless, because they desire to cooperate with the commission the Respondents intend to provide appropriate responses within a reasonable time, and submit that a 14 day extension is reasonable.

The Respondents further move the Commission to allow them to take discovery from the complaining party, Frontier Gas. The Respondents submit that such discovery is necessary to prove the defenses to this Complaint and to establish evidence in support of the Counter

Complaint that they have filed with the commission. The Respondents request permission to
Serve 15 Interrogatories and 15 Requests for Production of Documents.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of May, 2012, a true and correct copy of the
foregoing was served via U. S. Mail upon the following:

John N. Hughes
124 W. Todd Street
Frankfort, KY 40601



Adrian M. Mendiando