

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

PUBLIC SERVICE
COMMISSION

BALLARD RURAL TELEPHONE
COOPERATIVE CORPORATION, INC.

PSC CASE NO. 2004-00036

v.

JACKSON PURCHASE ENERGY CORPORATION

RESPONSE TO OBJECTION FOR MEDIATION

Comes the defendant, Jackson Purchase Energy Corporation (“JPEC”), through counsel, and for its reply to Ballard Rural Telephone Cooperative Corporation’s objection to Jackson Purchase Energy Corporation’s Motion for Mediation, states as follows:

1. In its order dated March 23, 2005, this Commission clearly suggested that the parties attempt to negotiate a settlement of this matter.
2. Plaintiff’s Response to JPEC’s Motion for Mediation is a clear rejection of the Commission’s suggestion.
3. JPEC believes that mediation in this matter might save the parties and, thereby, the rate payers money. Further, JPEC believes that allowing the parties an opportunity to discuss the matter face-to-face could lead to a reasonable conclusion for all parties involved.
4. Further, JPEC believes that a good-faith settlement discussion between the parties could resolve the impasse which exists in case number 2004-00319, styled *Application of*

Jackson Purchase Energy Corporation for Adjustment in Existing Cable Television

Attachment Tariff.

WHEREFORE, JPEC respectfully requests that the commission make clear its desire that the parties attempt to settle this matter without the necessity of a hearing before the Commission by entering an order requiring mediation between the parties.

Respectfully submitted,

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By



W. David Denton
Melissa D. Yates

ATTORNEYS FOR DEFENDANT

I hereby certify that 10 copies of the foregoing were filed with the Public Service Commission by mailing via Federal Express to:


BETH O'DONNELL EXEC DIR
PUBLIC SERVICE COMMISSION
215 SOWER BLVD
P O BOX 615
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True and correct copies of the foregoing have been mailed to:

HON ANITA MITCHELL ATTY
PUBLIC SERVICE COMMISSION
215 SOWER BLVD
P O BOX 615
FRANKFORT KY 40602

HON JOHN E. SELENT
DINSMORE & SHOHL LLP
1400 PNC PLAZA
500 W. JEFFERSON STREET
LOUISVILLE, KY 40202

on this 20th day of April , 2005.

By: 

W. David Denton
Melissa D. Yates