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RECEIVED

DEC 15 2004

PUBLIC SERVICE
COMMISSION

December 14, 2004

via Federal Express
Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: Jackson Purchase Energy Corporation--Advanced Notice of Intent to File Application for Adjustments in Existing Cable Television Attachment Tariff, before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2004-00319

Dear Ms. O'Donnell:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission") is one original and ten (10) copies of Ballard Rural Telephone Cooperative Corporation Inc.'s Response to Jackson Purchase's Motion to Reconsider in the above-styled case.

In addition, enclosed is a copy for file-stamping. Please return this copy to us in the enclosed self-addressed, stamped envelope. Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/rk

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

In the Matter of:

DEC 15 2004

JACKSON PURCHASE ENERGY CORPORATION--)
ADVANCED NOTICE OF INTENT TO FILE APPLICATION) Case No. 2004-00319
FOR ADJUSTMENTS IN EXISTING CABLE TELEVISION)
ATTACHMENT TARIFF)

PUBLIC SERVICE
COMMISSION

**RESPONSE TO JACKSON PURCHASE'S
MOTION TO RECONSIDER**

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, hereby files its response to the motion to reconsider filed by Jackson Purchase Energy Corporation ("Jackson Purchase"). In support of its response, Ballard Rural states as follows.

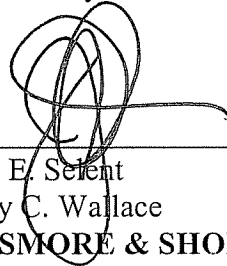
Pursuant to 807 KAR 5:001, §3 (8), "[i]f the Commission determines that a person has a special interest in the proceeding which is not otherwise adequately represented or that full intervention by a party is likely to present issues or to develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceeding, such person *shall* be granted full intervention" (emphasis added). Thus, pursuant to the regulation, the Commission need only determine that a party has a special interest in the proceedings or that the party is likely to present issues or develop facts that assist the Commission to grant a party's motion for full intervention.

In the present case, the Commission determined that the interventions of Ballard Rural and the Kentucky Cable Telecommunications Association "are likely to present issues and develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings." Order, Case No. 2004-00319, December 6, 2004. Accordingly, the Commission fully complied with the regulations in granting Ballard Rural's

motion for full intervention. There is no basis, therefore, for Jackson Purchase's motion to reconsider.

For the reasons stated above, Ballard Rural respectfully requests that the Commission deny Jackson Purchase's motion to reconsider.

Respectfully submitted,



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**COUNSEL TO BALLARD RURAL
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CORPORATION, INC.**

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served via First Class United States Mail, postage prepaid, to the following individuals this 14th day of December, 2004:

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