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(859) 231-3000 PHONE | (859) 253-1093 FAX | WWW.SKPCOM

ROBERT M. WATT, III  
859-231-3043  
watt@skp.com

June 13, 2005

Hon. Beth A. O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40601

RECEIVED

JUN 13 2005

PUBLIC SERVICE  
COMMISSION

Re: Equitable Production Company  
Case No 2005-00160

Dear Ms. O'Donnell:

We submit herewith for filing an original and six copies of the Motion of Equitable Production Company for an Extension of Time to Respond the Second Data Requests of the Commission Staff in the above-captioned case. Thank you for your attention to this matter.

Sincerely,



Robert M. Watt, III

Rmw  
Encl.

Cc: Daniel L. Frutchey, Esq. (w/encl.)  
Sandra Fraley, Esq. (w/encl.)  
Mr. John M. Quinn (w/encl.)  
Intervenors (w/encl.)

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF EQUITABLE	)	
PRODUCTION COMPANY TO INCREASE	)	CASE NO.
RATES PURSUANT TO KRS 278.485 AND	)	2005-00160
807 KAR 5:026, SECTION 9	)	

\* \* \* \* \*

MOTION OF EQUITABLE PRODUCTION COMPANY FOR EXTENSION OF TIME TO RESPOND TO SECOND DATA REQUEST OF COMMISSION STAFF

RECEIVED

JUN 13 2005

PUBLIC SERVICE COMMISSION

Equitable Production Company respectfully moves the Commission for an extension of time up to and including June 20, 2005, within which to file responses to the Second Data Request of the Commission Staff. Due to unforeseen circumstances, Equitable has been unable to assemble the information and documents necessary to provide complete responses to the subject data requests.

Respectfully submitted,

Robert M. Watt, III  
Stoll, Keenon & Park, LLP  
300 West Vine Street, Suite 2100  
Lexington, KY 40507

By Robert Watt  
Counsel for Equitable Production Company

**CERTIFICATE OF SERVICE**

This is to certify that the attached Motion have been served by mailing a copy of same, postage prepaid to the following persons on this 13th day of June 2005:

Tivis and Esther Newsome  
2064 Little Robinson Creek  
Virgie, KY 41572

Randall Tracy  
P.O. Box 116  
Pinsonfork, KY 41555



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Counsel for Equitable Production Company