

ROBERT L. BROWN III
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September 14, 2005

RECEIVED

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PUBLIC SERVICE
COMMISSION

VIA FACSIMILE AND MAIL

Public Service Commission
Ms. Beth O'Donnell
Executive Director
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602


**RE: ENTRY OF APPEARANCE AND MOTION FOR AN EXTENSION
OF TIME
CASE NUMBER 2005-00319**

Dear Ms. O'Donnell:

Enclosed please find an original and ten (10) copies of an Entry of Appearance and Motion for an Extension of Time as it relates to the above-mentioned matter. Please file the same at your earliest convenience.

Should you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,


Robert L. Brown III

RLB/ca

Enclosures

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**NOTICE OF GAS COST ADJUSTMENT
FILING OF CITIPOWER, LLC.**

CASE NO. 2005-00319

**ENTRY OF APPEARANCE AND MOTION FOR AN
EXTENSION OF TIME**

Comes the now the undersigned attorney, Robert L. Brown III, and hereby makes his entry of appearance generally as counsel of record for Citipower, LLC.

Further, Citipower, LLC, by and through its undersigned attorney respectfully requests an extension of time to address the issues raised in the Public Service Commission Staff's First Data Request of Commission Staff to Citipower, LLC. The undersigned attorney would state that he has just recently received this data request and has had insufficient time to respond, and further states that he will be out of the office starting September 21, 2005, until October 5, 2005. Based upon this, the undersigned would request an extension of time within which to reply to the Commission's request until October 15, 2005.

Respectfully Submitted,

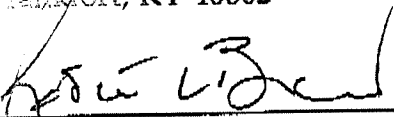


Robert L. Brown III
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CERTIFICATE OF SERVICE:

I hereby certify that the foregoing Motion was served by faxing a copy and by mailing the original and ten copies thereof, postage prepaid, this 14th day of September, 2005, to the following:

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602



Robert L. Brown III