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JUN 05 2006
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June 2, 2006

Beth A. O'Donnell, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40602

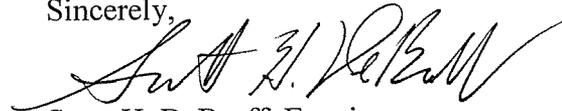
RE: Administrative Case NO. 2006-00045 – Petition for Request for Extension of Time to File Intervenor Testimony on behalf of Hunt Technologies, Inc. & Cellnet Technology, Inc.

Dear Ms. O'Donnell:

Please find enclosed the original and ten (10) copies of the Petition for Request for Extension of Time to file Intervenor Testimony on Behalf of Hunt Technologies, Inc, and Cellnet Technology, Inc. filed in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service have been served. Please place these documents on file.

Sincerely,



Scott H. DeBroff, Esquire
LeBoeuf, Lamb, Greene & MacRae
Counsel for Hunt Technologies, Inc.

SHD/bla

Cc: Certificate of Service

**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:
CONSIDERATION OF THE REQUIREMENTS
OF THE FEDERAL ENERGY POLICY ACT
OF 2005 REGARDING TIME-BASED
METERING, DEMAND RESPONSE, AND
INTERCONNECTION SERVICE**

CASE NO. 2006-00045

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PUBLIC SERVICE
COMMISSION

**PETITION FOR REQUEST FOR EXTENSION OF TIME
TO FILE INTERVENOR TESTIMONY
ON BEHALF OF
HUNT TECHNOLOGIES, INC. & CELLNET TECHNOLOGY, INC.**

AND NOW COMES **Scott H. DeBroff, Esquire** of LeBoeuf, Lamb, Greene & MacRae LLP, on behalf of his clients, **Cellnet Technology, Inc. ("Cellnet")** and **Hunt Technologies, Inc. ("Hunt")**, also known as the **Companies'**, for the purpose of this "Petition For Request for Extension of Time To File Intervenor Testimony" with respect to the proceedings of the Kentucky Public Service Commission ("KPSC" or the "Commission") to permit the Commission to consider the requirement of the Federal Energy Policy Act of 2005 regarding time-based metering, demand response and interconnection service and, avers the following:

1. *Hunt and Cellnet are parties interested in the above-captioned docket as meter technology providers to utilities in the State of Kentucky and across the country.*
2. The above-captioned proceeding was docketed by the Commission and an Order entered for a proceeding to permit the Commission to consider the requirements of the federal Energy

Policy Act of 2005 regarding time-based metering, demand response, and interconnection service on February 24, 2006.

3. Hunt and Cellnet filed their "Petition to Intervene" and requested expedited consideration of such on May 5, 2006 via facsimile and the pleading reached the Commission on May 8, 2006. The Companies' Petition was held, pending counsel's filing of the Kentucky Bar Association's Out-of-State Certification Form.

4. On May 10, 2006, the Companies' attended the Commission's Informal Conference in the KPSC offices in Frankfort, KY.

5. The jurisdictional electric utilities filed their testimony on May 18, 2006.

6. On May 26, 2006, the Kentucky Bar Association approved counsel's KBA Out-Of-State Certification for the above-captioned case, and on May 30, 2006, counsel faxed a copy of said approved form to the Commission and followed up with a hard copy in the mail.

7. The Companies' just learned that the Commission, on June 1, 2006, entered an Order granting the formal intervention of Hunt and Cellnet.

8. While waiting for our Intervention to be approved by the Commission, the Companies' have been gathering the data responses and the recently filed testimony as submitted by the jurisdictional utilities. However, as a result of not being an official party, the Companies' did not receive all of the testimony as it was submitted on the record, and at this time, they are in the process of gathering the testimony and reviewing it.

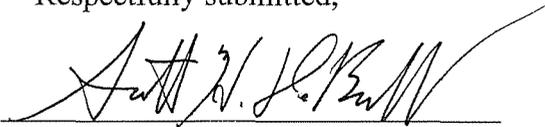
9. As such, and with the deadline for Intervenor Testimony set for this **Tuesday June 6, 2006**, the Companies' file this "Request for Extension of Time to File Intervenor Testimony" with this Commission.

10. The Companies' request an extension of seven (7) business days in which to file any Intervenor Testimony in the above-captioned case. In addition, the Companies' request that they be allowed to Fax File their Testimony on the 7th day, followed up with hard copies to the Commission.

WHEREFORE, Hunt and Cellnet hereby request that this Commission grant its "Petition For Request for Extension of Time To File Intervenor Testimony" in this case.

Respectfully submitted,

Dated: **June 2, 2006**

By: 

Scott H. DeBroff, Esquire

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**BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:
CONSIDERATION OF THE REQUIREMENTS
OF THE FEDERAL ENERGY POLICY ACT
OF 2005 REGARDING TIME-BASED
METERING, DEMAND RESPONSE, AND
INTERCONNECTION SERVICE**

CASE NO. 2006-00045

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent by U.S. First Class mail, facsimile, electronically or hand delivery, to all parties of record in this proceeding:

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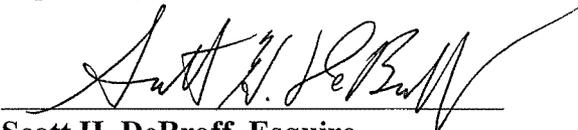
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Dated: **June 2, 2006**

Respectfully submitted,

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