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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE

COMMISSION

IN THE MATTER OF:

JACKSON PURCHASE ENERGY CORPORATION,	)	CASE NO. 2007-00116
	) )	

## JPEC'S MOTION FOR EXTENSION OF TIME TO ANSWER THE SECOND REQUEST FOR DATA FROM COMMISSION STAFF

Jackson Purchase Energy Corporation ("JPEC"), by and through its counsel, hereby moves for an extension of time to file its response to the Second Request for Data from Commission Staff. As grounds therefore, JPEC states as follows:

On Monday, February 11, 2008 and Tuesday, February 12, 2008, Western Kentucky was struck by a winter storm including sleet and ice. That storm resulted in the loss of power to a substantial number of JPEC's members. The specifics of this event have been reported to the PSC as required and are well documented. The administrative staff necessary to respond to the data requests have been working long hours and assisting with the restoration of power to JPEC's members in any way they are able. Because of the extraordinary effort and resources necessary to restore power to its members, JPEC personnel have been unable to meet with and properly discuss this matter with its counsel. Therefore, JPEC requires additional time to develop its responses to the staff's second set of data requests.

Wherefore, JPEC respectfully requests that it be allowed to have up to and including February 29, 2008, to file its Responses to the Second Data Request of the Commission Staff, which is 10 days following the original expected due date of February 19,

2008. Counsel for JPEC has consulted with the Attorney General's office and the Attorney

General's office has stated it has no objection to this motion.

Respectfully submitted,

**DENTON & KEULER** 

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W. David Denton Melissa D. Yates

ATTORNEYS FOR JACKSON PURCHASE ENERGY CORPORATION

I hereby certify that 10 copies of the foregoing were filed with the Public Service Commission by mailing via U.S. Mail Tand via facsimile transmission to:

MS BETH O'DONNELL EXEC DIR PUBLIC SERVICE COMMISSION 211 SOWER BLVD P O BOX 615 FRANKFORT KY 40602 Fax No.: 502-564-3460

True and correct copies of the foregoing have been mailed to:

HON ANITA MITCHELL PUBLIC SERVICE COMMISSION 730 SCHENKEL LANE P O BOX 615 FRANKFORT KY 40602

and

DENNIS G HOWARD LARRY COOK OFFICE OF THE ATTORNEY GENERAL 1024 CAPITAL CENTER DRIVE SUITE 200 FRANKFORT KY 40601-8204 on this 14 day of February, 2008.

Melissa D. Yates

cc: Kelly Nuckols @ Jackson Purchase Energy Corporation