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BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION

AUG 26 2011

PUBLIC SERVICE
COMMISSION

APPLICATION OF KENERGY CORP.)
FOR CERTIFICATE OF CONVENIENCE) CASE NO. 2011-_____
AND NECESSITY)

MOTION TO EXPEDITE

KENERGY CORP. (“Kenergy”) moves the KENTUCKY PUBLIC SERVICE COMMISSION (“Commission”) to expedite proceeds on this application for certificate of convenience and necessity. For its grounds Kenergy states as follows:

1. This is an application to construct a replacement microwave communication system. The necessity of the replacement is that a microwave frequency user has obtained from the FCC the right to Kenergy’s microwave frequencies beginning in 2013. In order to begin using the frequencies on January 1, 2012, the microwave frequency user has offered a sum to Kenergy to replace its existing system thereby enabling the microwave frequency user to begin using the frequencies on January 1, 2012. The sum offered represents seventy-four percent (74%) of the cost to Kenergy of the replacement system.

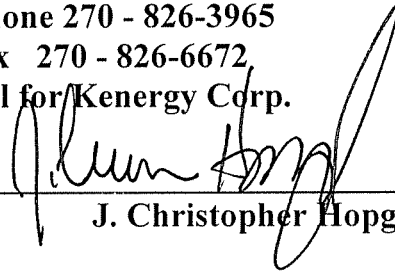
2. If the project is delayed, Kenergy would lose the funding from the provider.

3. Alternatively, Kenergy moves the Commission to enter a preliminary order authorizing Kenergy to move forward with the project pending the application.

This alternative remedy is in the nature of extraordinary relief due to the time constraints imposed upon Kenergy by the microwave frequency user and the likelihood that Kenergy would ultimately prevail on the merits herein.

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