




**JACKSON ENERGY
COOPERATIVE**

A Touchstone Energy Cooperative 

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MAR 18 2013

PUBLIC SERVICE
COMMISSION

March 14, 2013

Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
P. O. Box 615
Frankfort, KY 40602-0615

RE: CASE 2012-00428

Dear Mr. Derouen:

Enclosed please find Jackson Energy Cooperative's Motion requesting an extension of time to provide responses to the First Data Requests of Information from the Public Service Commission and the Attorney General.

If you have any questions and/or concerns pertaining to the enclosed, please don't hesitate to give me a call.

Best regards,

A handwritten signature in black ink, appearing to read "Clayton O. Oswald".

Clayton O. Oswald
Attorney

Enclosure

c: Jack Conway
Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8201

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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

PUBLIC SERVICE
COMMISSION

In the Matter of:

CONSIDERATION OF THE IMPLEMENTATION)	
OF SMART GRID AND SMART METER)	CASE NO. 2012-00428
TECHNOLOGIES)	

**MOTION OF JACKSON ENERGY COOPERATIVE FOR EXTENSION
OF TIME TO PROVIDE RESPONSES TO THE FIRST REQUEST FOR
INFORMATION FROM PSC STAFF AND THE ATTORNEY
GENERAL’S INITIAL REQUESTS FOR INFORMATION**

Jackson Energy Cooperative Corporation, by and through its undersigned legal counsel, hereby moves the Kentucky Public Service Commission for an Order granting it an additional thirty days in which to provide responses to the First Request For Information from PSC staff and the Attorney General’s Initial Requests for Information.

As grounds for this motion, Jackson Energy states that on February 27, 2013, the Attorney General filed with the PSC certain Initial Requests for Information to various utilities involved in this proceeding, including Jackson Energy. These Requests totaled fifty in number, many with discreet subparts. The requests seek not only basis information, but also certain opinions and policy positions from Jackson Energy.

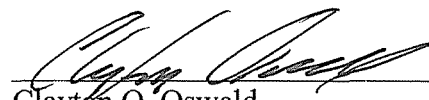
Likewise, on February 27, 2013, the PSC filed a First Request For Information, which included eighteen Requests directed to Jackson Energy, its wholesale power supplier, East Kentucky Power Cooperative, and other electric utilities. Many of these Requests also contained subparts and seek information that is quite detailed.

In total, Jackson Energy must answer approximately sixty eight data requests with subparts by March 20, 2013. Many of these requests are detailed and seek objective information

that must be assimilated from many different sources throughout Jackson Energy. Other requests seek a statement of policy formulation or opinion that must be discussed by the relevant persons at Jackson Energy. Jackson Energy believes it is in the best interests of its members, the PSC and the public at large that full, complete and thoughtful answers be given to address this very important topic. However, requiring responses to such a great number of requests in so short a period of time is unduly burdensome to Jackson Energy, inasmuch as it simply does not have the resources available to commit to the research and proper responses to these requests.

Accordingly, Jackson Energy Cooperative respectfully moves the Commission for an order granting it an extension of an additional thirty days in which to file responses to the data requests of both the Kentucky Attorney General and the Public Service Commission.

Respectfully submitted by,



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