

## **LOUISVILLE**

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May 12, 2004

via Hand Delivery
Ms. Beth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

RECEIVED

MAY 1 2 2004

PUBLIC SERVICE COMMISSION

Re: Extension of Time Case No. 2004-00036

Dear Ms. O'Donnell:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission") is one original and ten (10) copies of Ballard Rural Telephone Cooperative Corporation's ("Ballard Rural") Motion for Extension of Time in the above-styled case. Please note, by way of this motion, Ballard Rural, with the support of Jackson Purchase Energy Cooperative Corporation, is requesting an extension of time to respond to the data requests and requests for documents propounded by both the Commission and by both parties to the other. The responses are currently due to be filed with the Commission this Friday, May 14, 2004, and Ballard Rural is requesting that the parties have an extension to file the responses through Wednesday, May 19, 2004. Given the time sensitivity of this motion, Ballard Rural requests that the Commission expeditiously review and grant this motion.

Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP

Holly C. Wallace

HCW/rk Enclosure

cc: Mr. Harlon Parker (w/enclosure)

Amy Dougherty, Esq. (w/enclosure)

John E. Selent, Esq. (w/o enclosure)

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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

BALLARD RURAL TELEPHONE
COOPERATIVE CORPORATION, INC.
Complainant

V.

Case No. 2004-00036

JACKSON PURCHASE RURAL
ELECTRIC COOPERATIVE
CORPORATION
Defendant

## MOTION FOR EXTENSION OF TIME

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") for an extension of time through and including Wednesday, May 19, 2004, within which to respond to First Data Requests and Requests for Production of Documents in the above-styled case propounded by both the Commission and by both parties to the other. As grounds for this motion, Ballard Rural states that the pertinent individuals with whom counsel needs to consult to respond to the Data Requests and Requests for Documents are out of the office all week attending the Kentucky Telephone Association's Annual Meeting. Accordingly, Ballard Rural has been unable to consult fully with legal counsel regarding its final responses. Ballard Rural has consulted with Jackson Purchase Energy Cooperative Corporation ("Jackson Purchase") regarding this motion. Jackson Purchase has no objection. Justice will best be served by permitting the parties to have through and including May 19, 2004 to respond to the First Data Requests and Requests for Production of Documents propounded by both the

Commission and by both parties to the other. Therefore, Ballard Rural respectfully requests that the Commission expeditiously grant Ballard Rural's Request for Extension of Time through and including May 19, 2004.

Respectfully submitted,

John E. Selent Holly C. Wallace

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COUNSEL TO BALLARD RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

## **CERTIFICATE OF SERVICE**

It is hereby certified that the foregoing was served by mailing a copy of the same via Federal Express, postage prepaid, to the following individuals this day of May, 2004:

W. David Denton Denton & Keuler, LLP 555 Jefferson Street P.O. Box 929 Paducah, KY 42002-0929

G. Kelly Nuckols
President & CEO
Jackson Purchase Energy
Corporation
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