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June 21, 2005

FEDERAL EXPRESS
JUN 22 2005
PUBLIC SERVICE
COMM. KY

VIA FEDERAL EXPRESS

Hon. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
P. O. Box 615
Frankfort, KY 40601

Re: In the Matter of: Ballard Rural Telephone Cooperative Corporation, Inc. v. Jackson Purchase Energy Corporation before the Public Service Commission of the Commonwealth of Kentucky, Case No. 2004-00036

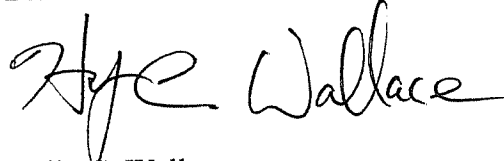
Dear Ms. O'Donnell:

Enclosed for filing in the above-styled case is an original and eleven copies of the Response of Ballard Rural Telephone Cooperative Corporation, Inc. to Motion for Extended Scheduling Order of Jackson Purchase Energy Corporation. Please file stamp and return one copy in the self-addressed postage prepaid envelope furnished herewith.

Thank you, and if you have any question, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



Holly C. Wallace

HCW/bmt

Enclosures

cc: John E. Selent, Esq. (w/enclosure)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUL 22 2005

PUBLIC SERVICE
COMMISSION

In the Matter of:

BALLARD RURAL TELEPHONE
COOPERATIVE CORPORATION, INC.

)
)

CASE NO. 2004-00036

v.

)
)

JACKSON PURCHASE ENERGY CORPORATION

)

**RESPONSE OF BALLARD RURAL TELEPHONE
COOPERATIVE CORPORATION, INC. TO
MOTION FOR EXTENDED SCHEDULING ORDER OF
JACKSON PURCHASE ENERGY CORPORATION**

Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, hereby responds to the motion of Jackson Purchase Energy Corporation ("Jackson Purchase") for an "expanded scheduling order."

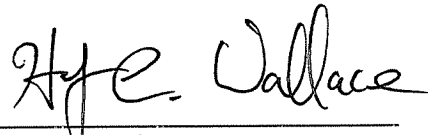
The motion of Jackson Purchase should be denied.

The Public Service Commission of the Commonwealth of Kentucky (the "Commission") entered a procedural schedule in this case on March 25, 2004. That procedural schedule provided for: (i) the pre-filing of direct testimony; (ii) requests for production of documents; (iii) requests for information; and (iv) rebuttal testimony. The time within which to perform all these actions has now long since passed. Indeed, rebuttal testimony, which was the last thing contemplated by the Commission's March 25, 2004 procedural schedule, was to be filed on April 30, 2004. The only things contemplated after that April 30th date was an informal conference and a public hearing, which the Commission has recently indicated, by order dated March 23, 2005, it will establish by a separate order. That is exactly what the Commission should do.

Contrary to Jackson Purchase's contention, the issues presented by this matter have been evident since the filing of the complaint by Ballard Rural on February 2, 2004; these are not new issues. Moreover, and again contrary to the contention of Jackson Purchase, there is no need for a statewide cost-of-service study. Under the methodology established in Administrative Case No. 251 for pole attachments, such a cost-of-service study would have no relevance in this proceeding.

It is now long since past time to schedule a hearing to resolve this matter. By granting Jackson Purchase's motion, the prompt and efficient resolution of this matter will be needlessly delayed. The motion of Jackson Purchase should be **DENIED** and this matter should be scheduled for a public hearing. The prefiled testimony and discovery dates established by the Commission's procedural order of March 23, 2004 have long past and the only thing left to do is schedule a public hearing. The Commission should do so.

Respectfully submitted,



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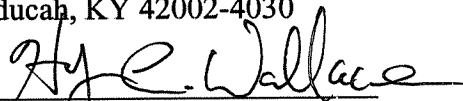
**COUNSEL TO BALLARD
RURAL TELEPHONE
COOPERATIVE
CORPORATION, INC.**

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served, via United States mail, first class, postage pre-paid, this 21st day of June, 2005 on the following:

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CORPORATION, INC.**

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