COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF:

MAR 0 3 2006 PUBLIC SERVICE COMMISSION

BALLARD RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

v.

PSC CASE NO. 2004-00036

JACKSON PURCHASE ENERGY CORPORATION

RESPONSE TO MOTION TO CONTINUE THE HEARING SCHEDULED FOR MARCH 15, 2006

Comes the defendant, Jackson Purchase Energy Corporation ("JPEC"), through counsel, and in response to Plaintiff's Motion to Continue the Hearing Scheduled for March 15, 2006, states as follows:

The motion correctly states that JPEC has no objection to rescheduling the hearing in this matter. However, JPEC respectfully requests that the Commission refrain from setting this matter during the month of June, 2006, as several of its key employees will be unavailable during much of the month of June. More specifically, the general manager of JPEC, Kelly Nuckols, has already scheduled business related meetings and travel during that time and will be unavailable for several days of the month. More specifically, Mr. Nuckols will be attending out-of-town meetings during June 1-2 and from June 17-22, 2006. Tracy Bensley, JPEC's new Vice President of Engineering and Operations will be moving his family from North Carolina to Paducah and will be unavailable during much of June as well. Further, during the final week of June, Mr. Nuckols and other key personnel will be preparing for and attending JPEC's annual meeting which is scheduled for June 29, 2006.

Wherefore, JPEC respectfully requests that the Commission consider a time other than the month of June 2006 for the hearing in this matter.

Respectfully Submitted,

DENTON & KEULER, LLP P. O. Box 929 Paducah, KY 42002-0929 Tel. No.: 270-443-8258 Fax No.: 270-442=6000 By ULLL W. David Denton Melissa D. Yates

I hereby certify that 10 copies of the foregoing were filed with the Public Service Commission by faxing and mailing via Federal Express to:

BETH O'DONNELL EXEC DIR PUBLIC SERVICE COMMISSION 215 SOWER BLVD P O BOX 615 FRANKFORT KY 40601 Fax: (502) 564-3460

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

HON ANITA MITCHELL ATTY PUBLIC SERVICE COMMISSION 215 SOWER BLVD P O BOX 615 FRANKFORT KY 40602

HON JOHN E. SELENT HON HOLLY C. WALLCE DINSMORE & SHOHL LLP 1400 PNC PLAZA 500 W. JEFFERSON STREET LOUISVILLE, KY 40202

on this 2nd day of March, 2006 Bv: W. David Denton Mellissa D. Yates