

ROBERT L. BROWN III
ATTORNEY AT LAW
1005 SOUTH MAIN STREET
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FAX (606) 528-3289
July 24, 2006

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JUL 26 2006
PUBLIC SERVICE
COMMISSION

Public Service Commission
Ms. Beth O'Donnell
Executive Director
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602

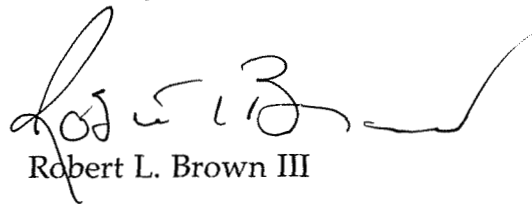
**RE: CITIPOWER, LLC
APPLICATION OF CITIPOWER, LLC FOR APPROVAL OF
REORGANIZATION PROPOSAL
CASE NUMBER 2004-00444**

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of a Motion for Extension of Time as it relates to the above-mentioned matter. Please file the same at your earliest convenience.

Should you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,



Robert L. Brown III

RLB/ca

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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JUL 26 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

CITIPOWER, LLC

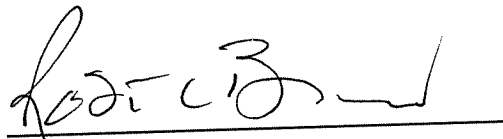
APPLICATION OF CITIPOWER, LLC FOR
APPROVAL OF REORGANIZATION PROPOSAL

CASE NO. 2004-00444

MOTION FOR AN EXTENSION OF TIME

Comes the now the undersigned attorney, Robert L. Brown III, and hereby respectfully requests an extension of time to address the issues raised in the Public Service Commission Staff's written request dated July 14, 2006. The undersigned attorney would state that due to the schedule of said attorney this firm has not had adequate time to compile the necessary information to adequately respond to the Commission's request. For the above stated reason, the undersigned is requesting an extension of time within which to reply to the Commission's request until August 15, 2006.

Respectfully Submitted,



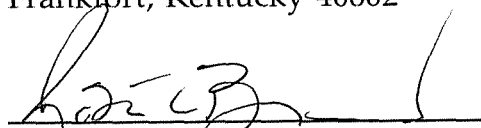
Robert L. Brown III
1005 South Main Street, Suite 101
Corbin, Kentucky 40701
Telephone: (606) 528-3073

CERTIFICATE OF SERVICE:

I hereby certify that the foregoing Motion was served by faxing a copy and by and mailing the original and ten copies thereof, postage prepaid, this 24 day of July, 2006, to the following:

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602

Hon. Gregory D. Stumbo
Attorney General
1024 Capital Center Drive
Suite 200
Frankfort, Kentucky 40602



Robert L. Brown III