

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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MAR 31 2005
PUBLIC SERVICE
COMMISSION

In the Matter of:

AN ADJUSTMENT OF THE GAS)
RATES OF THE UNION LIGHT,)
HEAT AND POWER COMPANY)

CASE NO. 2005-00042

MOTION FOR EXTENSION OF TIME
IN WHICH TO FILE REQUESTS FOR INFORMATION

Comes the Attorney General, by counsel to advise the Commission that he has received word today that his accounting consultant, Robert Henkes, has been hospitalized following diagnostic procedures performed today and preceding treatment later this week. Based on this, the Attorney General will not be able to comply with the procedural deadline to file data requests pertaining to accounting matters by April 5, 2005, and therefore, requests that he be granted an extension of time to file data requests pertaining to accounting matters until April 8, by which time Mr. Henkes believes he will be able to complete his review of the filing. Via electronic correspondence, the Attorney General has received word from corporate counsel for ULH&P that this is acceptable to ULH&P. A copy of that email is attached.

Respectfully submitted,

GREGORY D. STUMBO
Attorney General



Elizabeth E. Blackford
Assistant Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204
(502) 696-5453

NOTICE OF FILING AND CERTIFICATION OF SERVICE

I hereby give notice that I have filed the original and ten true copies of the foregoing with the Executive Director of the Kentucky Public Service Commission at 211 Sower Boulevard, Frankfort, Kentucky, 40601 this the 31st day of March, 2005, and certify that this same day I have served the parties both electronically and by mailing a true copy, postage prepaid, to the following:

JOHN P STEFFEN
VICE PRESIDENT RATES
THE UNION LIGHT HEAT & POWER CO
139 E FOURTH STREET
CINCINNATI, OH 45202
John.Steffen@cinergy.COM

ROBERT M WATT ESQ
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300 WEST VINE STREET
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LEXINGTON, KY 40507-1801
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Blackford, Betsy (KYOAG)

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From: Finnigan, John [John.Finnigan@Cinergy.COM]
Sent: Thursday, March 31, 2005 1:31 PM
To: Blackford, Betsy (KYOAG); Robert Olson; Mitchell, Anita L (PSC)
Subject: RE: re data requests in both ULH&P gas rate case, Case No. 05-042, and deferred debit, Case No. 05-096

Fine with me.

From: Blackford, Betsy (KYOAG) [mailto:betsy.blackford@ag.ky.gov]
Sent: Thursday, March 31, 2005 1:30 PM
To: Finnigan, John; 'Robert Olson'; Mitchell, Anita L (PSC)
Subject: re data requests in both ULH&P gas rate case, Case No. 05-042, and deferred debit, Case No. 05-096

Counsel,

I have just received a call from the family of my consultant, Robert Henkes, indicating that following an angiogram done today he is to remain hospitalized under orders to rest and do no work for a couple of days until he can undergo angioplasty. His medically interrupted plan had been to prepare data requests for the gas rate case over the weekend and we were going to squeeze in the deferred debit review later next week. Under the circumstances, I need to request that the gas data requests from Henkes only (all others will be ready to go on schedule) in 2004-00042 be delayed until the end of next week and that the deferred debit data requests in 2005-00096 be pushed back until April 12 (despite the fact that I have just filed a motion to intervene in the deferred debit case indicating that I am aware of and can abide by the March 23 procedural schedule setting the 8th of April as the date for data request). Your help in this will be appreciated.

Betsy Blackford

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3/31/2005