

MATHIS, RIGGS & PRATHER, P.S.C.
ATTORNEYS AT LAW
500 MAIN STREET, SUITE 5
SHELBYVILLE, KENTUCKY 40065

C. LEWIS MATHIS, JR.
T. SHERMAN RIGGS
DONALD T. PRATHER
NATHAN T. RIGGS

TELEPHONE: (502) 633-5220
FAX: (502) 633-0667

E-MAIL: mrp@iglou.com

June 21, 2006

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

RECEIVED
JUN 26 2006
PUBLIC SERVICE
COMMISSION

Re: Shelby Energy Cooperative, Inc. -
Failure to Comply with KRS 278.042

Dear Ms. O'Donnell:

Enclosed please find one original and ten (10) copies, plus an extra first page only, of the following:

1. Shelby Energy Cooperative, Inc.'s Motion for Continuance;
and
2. Shelby Energy Cooperative, Inc.'s Motion for Additional
Time to Respond to Commission Staff's Order.

Please file the original and ten copies of each Motion with the Commission and return to me the file-stamped first page copies. For your convenience I have enclosed a self-addressed stamped envelope.

Yours truly,

MATHIS, RIGGS & PRATHER, P.S.C.

BY: 
Donald T. Prather

DTP/pm
Enclosures
Cc: Dudley Bottom, Jr.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JUN 26 2006
PUBLIC SERVICE
COMMISSION

In the Matter of:

Shelby Energy Cooperative, Inc. }

Failure to Comply with KRS 278.042 }

CASE NO. 2006-00098

**SHELBY ENERGY COOPERATIVE, INC.'S
MOTION FOR ADDITIONAL TIME TO RESPOND
TO COMMISSION STAFF'S ORDER**

Comes Shelby Energy Cooperative, Inc. ("Shelby Energy"), by counsel, and respectfully moves that the Commission grant Shelby Energy an extension of time to respond to the Commission Staff Order dated June 8, 2006. The Contractor in question, Dobson Power Line Construction, Inc. ("Dobson"), has been contacted by OSHA and advised OSHA's report should be issued in two to three weeks. That report should shed light on the issues in question and delaying the instant case until after that report is received will not cause any harm. The OSHA report may pinpoint exactly which NESC rules were violated. For the foregoing reasons, Shelby Energy respectfully requests that the Commission grant it an extension of time in which to answer or otherwise respond to the Commission Staff's Order

dated June 8, 2006, such extension to continue until after Dobson receives the OSHA report or until further order by the Commission if that report is not received in a timely fashion.

Respectfully submitted,

Mathis, Riggs & Prather, P.S.C.

By: 

Donald T. Prather
500 Main Street, PO Box 1059
Shelbyville, Kentucky 40066-1059
Phone: (502) 633-5220
Fax: (502) 633-0667
Attorney for Shelby Energy
Cooperative, Inc.

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 26 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

Shelby Energy Cooperative, Inc. }

Failure to Comply with KRS 278.042 }

CASE NO. 2006-00098

**SHELBY ENERGY COOPERATIVE, INC.'S
MOTION FOR CONTINUANCE**

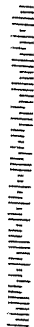
Comes Shelby Energy Cooperative, Inc. ("Shelby Energy"), by counsel, and respectfully moves that the Commission continue the hearing presently scheduled for July 11, 2006 until after a report is issued by OSHA on the incident in question. That report should provide additional relevant information. Shelby Energy will immediately contact the Commission once Dobson Power Line Construction, Inc. ("Dobson") receives the OSHA report and will at that point request an informal conference to consider all of the information including the OSHA report. If the matter is not resolved at that informal conference, a hearing should then be scheduled by the Commission. Shelby Energy further requests that the owner of Dobson be present at any informal conference and formal hearing.

Respectfully submitted,

Mathis, Riggs & Prather, P.S.C.

By:  _____

Donald T. Prather
500 Main Street, PO Box 1059
Shelbyville, Kentucky 40066-1059
Phone: (502) 633-5220
Fax: (502) 633-0667
Attorney for Shelby Energy
Cooperative, Inc.



MATHIS, RIGGS & PRATHER, P.S.C.

ATTORNEYS AT LAW
540 MAIN STREET SUITE 5
SHELBYVILLE, KENTUCKY 40065-1147

RECEIVED
JUN 26 2006
PUBLIC SERVICE
COMMISSION



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