



S T O L L · K E E N O N · O G D E N
P L L C

2000 PNC PLAZA
500 WEST JEFFERSON STREET
LOUISVILLE, KENTUCKY 40202-2828
502-333-6000
FAX: 502-333-6099
WWW.SKOFIRM.COM

KENDRICK R. RIGGS
DIRECT DIAL 502-560-4222
DIRECT FAX 502-627-8722
kendrick.riggs@skofirm.com

June 14, 2006

RECEIVED

JUN 14 2006

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40601

RE: An Examination by the Public Service Commission of the Environmental Surchage Mechanism of Kentucky Utilities Company for the Six-Month Billing Periods Ending July 31, 2003, January 31, 2004, January 31, 2005, July 31, 2005, and January 31, 2006, and for the Two-Year Billing Period Ending July 31, 2004
KPSC Case No. 2006-00129

Dear Ms. O'Donnell:

Enclosed please find and accept for filing the original and ten copies of Kentucky Utilities Company's Motion for Extension of Time in the above-referenced matter. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,

Kendrick R. Riggs

KRR/ec

Enclosures

cc: Elizabeth E. Blackford, Esq. (w/ enclosure)
Michael L. Kurtz, Esq. (w/ enclosure)

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

JUN 14 2006

PUBLIC SERVICE
COMMISSION

In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE)
COMMISSION OF THE ENVIRONMENTAL)
SURCHARGE MECHANISM OF KENTUCKY)
UTILITIES COMPANY FOR THE SIX-MONTH)
BILLING PERIODS ENDING JULY 31, 2003,)
JANUARY 31, 2004, JANUARY 31, 2005,)
JULY 31, 2005 AND JANUARY 31, 2006 AND FOR)
THE TWO-YEAR BILLING PERIOD ENDING)
JULY 31, 2004)

CASE NO. 2006-00129

MOTION FOR EXTENSION OF TIME

Kentucky Utilities Company ("KU") hereby moves the Kentucky Public Service Commission ("Commission") for an extension of time through and until Monday, June 19, 2006 in which to file the testimony of Mr. Robert M. Conroy in this matter and also in which to submit its responses to Item Nos. 1 and 3 of Appendix B to the Commission's April 25, 2006 Order. KU will submit this information to the Commission and the intervenors as soon as possible, but no later than Monday, June 19, 2006.

As grounds for this Motion, KU states that while preparing its responses to Item Nos. 1 and 3 of Appendix B to the Commission's April 25, 2006 Order, questions about the accuracy of the data were raised that need to be addressed in order to present accurate information in the filing. The requested additional extension of time is necessary to ensure the accuracy of the calculation of the over- or under- recovery amount. This Motion for Extension of Time is not made for the purpose of unduly delaying the Commission's examination and if granted will not prejudice the Commission's ability to conduct its examination. On or before Monday, June 19, 2006, KU will submit the testimony of Mr. Robert M. Conroy, as well as, its responses to Item Nos. 1 and 2 of Appendix B to the Commission's April 25, 2006 Order as soon as it becomes

available. KU further commits to provide such information to intervening counsel on Monday by both electronic and regular mail. KU requests the Commission retain June 20, 2006 as the date for the informal conference.

WHEREFORE, Kentucky Utilities Company respectfully requests that the Commission issue an order granting an extension of time 2006 to file the testimony of Mr. Robert M. Conroy in this matter and also to submit its responses to Item Nos. 1 and 2 of Appendix B to the Commission's April 25, 2006 Order as soon as possible, but no later than through and until Monday, June 19, 2006.

Dated: June 14, 2006

Respectfully submitted,



Kendrick R. Riggs
Sarah K. M. Adams
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
Telephone: (502) 333-6000

Robert J. Ehrler
Senior Corporate Attorney
E.ON U.S. LLC
220 West Main Street
Post Office Box 32010
Louisville, Kentucky 40232
Telephone: (502) 627-2305

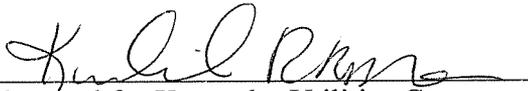
Counsel for Kentucky Utilities Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing Motion was served, via United States mail, postage prepaid, and by electronic email to the following persons on the 14th day of June, 2006:

Elizabeth E. Blackford
Assistant Attorney General
Office of the Attorney General
Utility & Rate Intervention Office
1024 Capital Center Drive, Suite 200
Frankfort, Kentucky 40601-8204

Michael L. Kurtz
Boehm Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202


Counsel for Kentucky Utilities Company