HOWARD DOWNING ATTORNEY AT LAW

109 South First Street Nicholasville, Kentucky 40356 (859)885-4619 fax (859)885-1127

June 13, 2006

JUN I 4 2006

PUBLIC SERVICE COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission of Ky.
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

RE: MOTIONS FOR FILING CASE NO. 2006-00214

Dear Ms. O'Donnell:

Please file the enclosed pleading in Case No. 2006-00214 with request for an informal conference with staff to maintain the status quo in this case.

Thanks for your assistance.

Yours truly,

HOWARD DOWNING, ATTORNEY

Blue Grass Energy Cooperative Corporation

Enclosure: HD/pb

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

JUN 14,06

		PUBLIC SERV.
Petitions of Kentucky Utilities Company and Blue)	COMMISSION
Grass Energy Cooperative Corporation to be)	CASE NO.
Designated as the Retail Electric Service Supplier)	2006-00214
for the New Wal-Mart Store in Cynthiana, Kentucky)	

MOTION FOR ORDER PROHIBITING ELECTRICAL SERVICE TO SITE OF NEW WAL-MART STORE NO. 591 UNTIL APPROVED BY ORDER OF PSC AND REQUEST FOR INFORMAL CONFERENCE WITH STAFF

Petitioner, Blue Grass Energy Cooperative Corporation, moves the Kentucky Public Service Commission as follows:

- 1. For an order prohibiting any new extension or change in the electric service to the site of the new Wal-Mart Store No.591 until the petitions are heard by the Public Service Commission.
- 2. For an informal conference with the Commission staff to provide opportunity for settlement of any issues herein, including, but not limited to, temporary electrical service to the site of the new Wal-Mart Store No. 591 pending final order of the Public Service Commission.
- 3. That no temporary or new extension of any electrical service be permitted on a temporary basis without agreement by the parties and/or with approval of the Public Service Commission, but without prejudice to the full and final consideration of the petitions as to all issues set forth therein.

4. That the Public Service Commission issue such temporary orders as are equitable and necessary to maintain the status quo of both petitioners, without prejudice to either petitioner as to the final hearing and order in this case.

Notice is given that this Motion will be heard by the Public Service Commission at such time and place as determined by the Kentucky Public Service Commission.

HOWARD DOWNING

109 South First Street

Nicholasville, KY 40356

Phone: 859-885-4619

ATTORNEY FOR BLUE GRASS ENERGY

COOPERATIVE CORPORATION

I certify that a true copy of the above Motions was mailed this 13th day of June, 2006 to the following:

Ms. Allyson K. Sturgeon Ms. Elizabeth L. Cocanougher 220 West Main Street Louisville, KY 40202 Attorneys for

Kentucky Utilities Company

Mr. J. Gregory Cornett

Stoll, Keenon, Ogden PLLC

Suite 1700

500 West Jefferson Street

Louisville, KY 40202

Attorney for

Kentucky Utilities Company

Mr. John P. Colgan

Wal-Mart Stores, Inc.

2001 SE 10th Street

Bentonville, AR 72716-0550

Ms. Beth O'Donnell

Executive Director

Public Service Commission of Ky.

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HOWARD DOWNING, ATTORNEY FOR

BLUE GRASS ENERGY COOPERATIVE CORPORATION