

Zielke Law Firm PLLC

ATTORNEYS AT LAW

1250 MEIDINGER TOWER
462 SOUTH FOURTH AVENUE
LOUISVILLE, KY 40202-3465
(502) 589-4600 • Fax (502) 584-0422
WWW.ZIELKEFIRM.COM

May 19, 2010

VIA FACSIMILE 502-564-7279
AND OVERNIGHT MAIL

Quang Nguyen, Esq.
Public Service Commission
211 Sower Blvd.
Frankfort, Kentucky 40602

RECEIVED

MAY 20 2010

PUBLIC SERVICE
COMMISSION

RE: Case No. 2009-00549
Case No. 2009-00548

Dear Mr. Nguyen:

Enclosed please find the Kentucky Cable Telecommunications Association's unopposed motions for extension of time to file response to the Commission Staff's data request. As you instructed, I have both faxed and sent by overnight mail these motions.

Sincerely,

Janice M. Theriot

Enclosures

**COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION** **RECEIVED**

In the Matter of:

MAY 20 2010

APPLICATION OF LOUSVILLE GAS)
AND ELECTRIC COMPANY FOR AN)
ADJUSTMENT OF ITS ELECTRIC)
AND GAS BASE RATES)

**PUBLIC SERVICE
COMMISSION**

CASE NO. 2009-00549

**KENTUCKY CABLE TELECOMMUNICATIONS
ASSOCIATION'S UNOPPOSED MOTION FOR EXTENSION OF TIME**

The Kentucky Cable Telecommunications Association ("KCTA") respectfully files this unopposed motion for a brief extension of time to file its response to the Commission Staff's data request. The Staff has informed KCTA that it consents to this motion, which will not affect any other deadline in this proceeding.

1. On May 6, according to the Commission's Web site, the Commission Staff filed a request for data from KCTA. Under the Commission's procedural schedule, KCTA's response to that data request is due today, May 19, 2010.

2. KCTA's counsel, however, never received the data request and was unaware of its existence until this morning. KCTA is uncertain why this occurred. However, it may have been the result of KCTA's recent change in local counsel: As noted in documents filed with the Commission on May 11 and 17, respectively, Frank F. Chuppe withdrew as KCTA counsel in this matter due to a conflict and was recently replaced by Laurence J. Zielke.

3. KCTA counsel contacted KCTA officials this morning to ascertain whether the Commission Staff's data request could be answered without seeking an extension. KCTA officials informed counsel that they did not have the answers handy and that it could take several days to gather the necessary information.

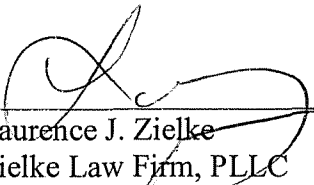
4. KCTA counsel contacted the Commission Staff and relayed the above information. The Commission Staff informed KCTA that it has no objection to an extension of the deadline until Monday, May 24, 2010, for KCTA to answer its data request.

5. KCTA therefore respectfully requests an extension of time to file its response to the Staff's data request, to and including May 24, 2010. The extension would not prejudice any party because it would not affect the broader procedural schedule.

WHEREFORE, KCTA respectfully moves for an extension of time to file its response to the Staff's data request.

Respectfully submitted,

Gardner F. Gillespie
Dominic F. Perella
HOGAN LOVELLS US LLP
555 Thirteenth Street, N.W.
Washington, D.C. 20004
(202) 637-5600
gardner.gillespie@hoganlovells.com
dominic.perella@hoganlovells.com



Laurence J. Zielke
Zielke Law Firm, PLLC
1250 Meidinger Tower
462 South 4th Street
Louisville, KY 40202
Phone: (502) 589-4600
lzielke@zielkefirm.com

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon the following, by U.S. Mail, postage prepaid, on this the 19th day of May, 2010

Dennis G. Howard, II
Lawrence W. Cook
Paul D. Adams
Assistant Attorney General
Office of the Attorney General Utility and Rate
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Allyson K. Sturgeon
Senior Corporate Attorney
E.ON US LLC
220 West Main Street
Louisville, KY 40202

Kendrick R. Riggs
Stoll Keenon Ogden, PLLC
200 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 E. Seventh Street, Suite 1510
Cincinnati, OH 45202

David C. Brown
Stites & Harbison, PLLC
1800 Providian Center
400 West Market Street
Louisville, KY 40202

Iris G. Skidmore
415 West Main Street
Suite 2
Frankfort, KY 40601

Lisa Kilkelly
Eileen Ordover
Legal Aid Society
416 W. Muhammad Ali Blvd.
Suite 300
Louisville, KY 40202

Carroll M. Redford, III
Miller, Griffin & Marks, PSC
271 W. Short St., Ste. 600
Lexington, KY 40507

Holly Rachel Smith
Hitt Business Center
3803 Rectortown Road
Marshall, VA 20115

James T. Selecky
BAI Consulting
16690 Swingley Ridge Road
Suite 140
Chesterfield, MO 63017

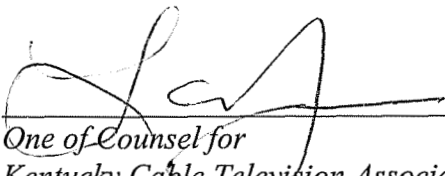
Robert A. Ganton
Regulatory Law Office
US Army Legal Services Agency
901 N. Stuart Street, Suite 525
Arlington, VA 22203-1837

Steven A. Edwards
Administrative Law Division
Office of Staff Judge Advocate
1310 Third Avenue Room
Fort Knox, KY 40121-5000

Katherine K. Yunker
Yunker & Yunker, PLC
P.O. Box 21784
Lexington, KY 40522-1784

Carolyn Ridley
Vice President – Regulatory
TW Telecom of Kentucky, LLC
555 Church Street, Suite 2300
Nashville, TN 37219

Mathew R. Malone
William H. May, II
Hurt, Crosbie and May PLLC
The Equus Building
127 West Main Street
Lexington, KY 40507



*One of Counsel for
Kentucky Cable Television Association*