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February 16, 2012

RECEIVED

FEB 1 6 2012

PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Blvd. P. O. Box 615 Frankfort, KY 40602-3940

Re:

Application of Kentucky Frontier Gas Company, LLC as Bankruptcy Operator of B.T.U. Gas Company v. Harry Thompson, Thompson Energy, et al. and Other Unknown Entities
Case No. 2012-00028

Dear Mr. Derouen:

Enclosed is an original and 10 copies of a Notice of Entry Appearance and Motion for Extension of Time filed on behalf of Harry Thompson and Chattaco, Inc. Please accept these as filed with the Public Service Commission upon receipt. If I need to direct this to any other person, or if you have any questions regarding the foregoing, please let me know.

Very truly yours,

Adrian M. Mendiondo

AMM:gcm Enclosure

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

FEB 1 6 2012

PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY FRONTIER GAS)	
COMPANY, LLC AND BANKRUPTCY)	
OPERATOR OF B.T.U. GAS COMPANY)	CASE NO.
)	2012-00028
V.)	
	Ś	
HARRY THOMPSON, THOMPSON ENERGY	Ś	
ET AL. AND OTHER UNKNOWN ENTITIES	Ś	
	,	

NOTICE OF ENTRY OF APPEARANCE AND MOTION FOR EXTENSION OF TIME

The undersigned, Adrian M. Mendiondo, Shelby C. Kinkead, Jr. and the law firm of Kinkead & Stilz, PLLC, hereby give notice that they are entering an appearance on behalf of, and will be acting as counsel for, Harry Thompson and Chattaco, Inc. with respect to this matter. The undersigned respectfully request that they be identified as counsel on all dockets and provided with notice of all future pleadings and communications pertaining to this matter.

Further, and on behalf of Harry Thompson and Chattaco, Inc., the undersigned respectfully move the Commission for a 10-day extension of time to provide the response required at page 6, paragraph 3, of the Commission's Order entered in this matter on February 3, 2012, such that the response will be provided no later than February 27, 2012. As grounds for this Motion the undersigned state that they were first contacted regarding this matter yesterday, February 15, 2012, and first received the Complaint and Order today, February 16. The undersigned requests that a brief extension be granted to allow them an opportunity to investigate

the allegations and prepare an appropriate response. A ten-day extension is a minimal extension that should not cause any prejudice to any party.

Respectfully submitted,

Adrian M. Mendiondo KINKEAD & STILZ, PLLC

301 East Main Street, Suite 800 Lexington, Kentucky 40507

Phone: (859) 296-2300 Fax: (513) 296-2566

E-mail: amendiondo@ksattorneys.com

CERTIFICATE OF SERVICE

I hereby certify that on the day of February, 2012, a true and correct copy of the foregoing was served via U. S. Mail upon the following:

John N. Hughes 124 W. Todd Street Frankfort, KY 40601

Adrian M. Mendiondo