

ROBERT L. BROWN III

ATTORNEY AT LAW

1005 SOUTH MAIN STREET
CORBIN, KENTUCKY 40701

(606) 528-3073
FAX (606) 528-3289

March 16, 2009

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

RECEIVED
MAR 18 2009
PUBLIC SERVICE
COMMISSION

RE: CASE NO. 2009-00080

Dear Mr. Derouen:

Enclosed please find an original and ten copies of a Motion for an Extension of Time as it relates to the above-mentioned matter.

Thank you for your assistance in this matter, and should you have any questions, please do not hesitate to contact me.

Sincerely,


Robert L. Brown III

RLB/ca

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PURCHASED GAS ADJUSTMENT FILING
OF CITIPOWER, LLC

RECEIVED

MAR 18 2009

PUBLIC SERVICE
COMMISSION

CASE NO. 2009-00080

MOTION FOR AN EXTENSION OF TIME

Comes the now the undersigned attorney, Robert L. Brown III, and enters his appearance herein, and hereby respectfully requests an extension of time to address the issues raised in the Public Service Commission Staff's Initial Data Request of Commission Staff to Citipower, LLC, (the "Utility"). The Utility is working diligently to respond to the Initial Data Request of the Commission (dated March 3, 2009), however, due to the nature of the questions, the need to obtain information from third parties, and current time restraints of the Utility Staff, the Utility respectfully requests an additional ten (10) days from the date of this Motion to file responses to the initial request for information.

Respectfully Submitted,



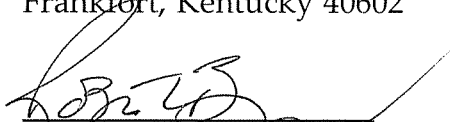
Robert L. Brown III
1005 South Main Street, Suite 101
Corbin, Kentucky 40701
Telephone: (606) 528-3073

CERTIFICATE OF SERVICE:

I hereby certify that the foregoing Motion was served by faxing a copy and by and mailing the original and ten copies thereof, postage prepaid, this 14 day of March, 2009, to the following:

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

Hon. Jack Conway
Attorney General
1024 Capital Center Drive
Suite 200
Frankfort, Kentucky 40602


Robert L. Brown III