

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED
MAR 17 1997
MISSOURI
PUBLIC SERVICE COMMISSION

In the Matter of the Application)
of the City of Poplar Bluff,)
Missouri, For an Order Assigning)
Exclusive Service Territories and) Case No. EO-97-348
For Determination of Fair and)
Reasonable Compensation Pursuant)
to Section 386.800 RSMo. 1994.)

MOTION FOR ADDITIONAL TIME TO RESPOND
TO DATA REQUEST NO. 1 OF CITY OF POPLAR BLUFF

COMES NOW Ozark Border Electric Cooperative, by and through its counsel, and moves the Public Service Commission for an order allowing Ozark Border Electric Cooperative sixty (60) additional days to respond to Data Request No. 1 of the City of Poplar Bluff, Missouri, based upon the following:

1. City of Poplar Bluff has supplied Cooperative with its Data Request No. 1 pursuant to its Application which was filed by City on February 24, 1997. Cooperative has never received any order giving it notice that it has been joined as a necessary party and establishing the procedural schedule except by fax transmission from City on March 7, 1997. Cooperative received City's Data Request No. 1 on March 10, 1997, following a fax transmission on March 6, 1997. The fax transmission of City's Request was prior to any notice to Cooperative that it had been joined as a necessary party and Cooperative still has not received anything from the Public Service Commission notifying it officially that it is a necessary party in the above-captioned cause.

2. The Request of the City of Poplar Bluff asks for "detailed engineering and accounting data" with regard to each of the areas

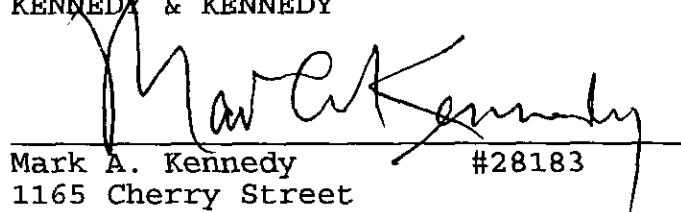
described in the Application filed on February 24, 1997 and asks Cooperative to "provide a detailed accounting from the records of Ozark Border which sets forth all items (showing the components and calculations thereof for each item) and the related amounts which Ozark Border claims it is entitled to for each of the matters addressed in Paragraphs 1, 2, 3, 4 and 5 of sub-section 5 of §386.800, RSMo., 1994."

3. Cooperative has no problem with providing such information to the City of Poplar Bluff in a timely fashion but has not been provided with enough time to completely respond to Data Request No. 1 since it received notice of same only four (4) days prior to the time that the request is to be completed.

WHEREFORE, for the aforementioned reasons, Cooperative requests that the Public Service Commission in the State of Missouri extend the time for answering City's Data Request No. 1 by a period of sixty (60) days and that the proposed schedule contemplated by the Commission's Order of March 5, 1997 be amended to comport with this Motion.

Respectfully submitted,

KENNEDY & KENNEDY

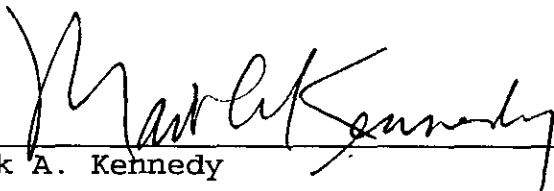


Mark A. Kennedy #28183
1165 Cherry Street
P. O. Box 696
Poplar Bluff, MO 63902
(573) 686-2459

ATTORNEYS FOR OZARK BORDER
ELECTRIC COOPERATIVE

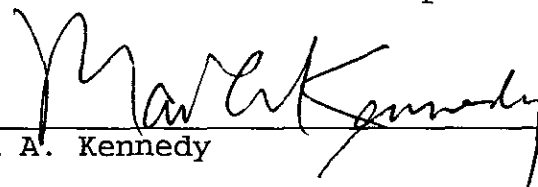
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion was mailed to all parties of record and to counsel for the City of Poplar Bluff, Missouri, this 13th day of March, 1997.

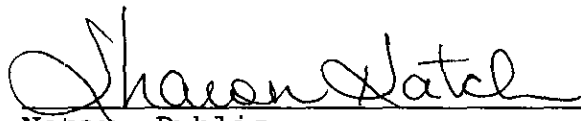

Mark A. Kennedy

VERIFICATION

The undersigned, being first duly sworn, states upon his oath that he has read the foregoing document and that the matters stated therein are true and correct to the best of his knowledge, information and belief, and the indicated attorneys are authorized to make this filing on behalf of Ozark Border Electric Cooperative.


Mark A. Kennedy

SUBSCRIBED AND SWORN to before me, a Notary Public, at office in Poplar Bluff, Missouri, this 13th day of March, 1997.


Notary Public

My Commission Expires:

7-1-98