

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY FRONTIER	)	CASE NO. 2017-00263
GAS, LLC FOR ALTERNATIVE RATE	)	
ADJUSTMENT	)	

COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION  
TO KENTUCKY FRONTIER GAS, LLC

Kentucky Frontier Gas, LLC ("Frontier"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due on or before October 6, 2017. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Frontier shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Frontier

fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Frontier shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the response to the Commission's Order of July 28, 2017 ("July 28, 2017 Order"), Items 2.b. and 2.f.

a. Provide a discussion of the expected future replacement of 25 miles of steel pipe, as stated in the response to Item 2.b., and reconcile the response to Item 2.b with the earlier statement in that same response that Frontier still has approximately 27 miles of steel pipe in its various systems.

b. Reconcile the statement that 25 miles of steel pipe remains to be replaced, considering that in excess of 26 miles were originally approved for replacement in Frontier's Pipeline Replacement Program ("PRP"), as described in the question to Frontier in Item 2.f.

c. Provide in spreadsheet format a comparison of the miles of pipe per system originally planned for replacement, including the Public Gas system, the miles

actually replaced by system per year, and the miles per year expected to be replaced in 2017 and annually thereafter.

2. Refer to the response to Commission Staff's Second Request for Information, ("Staff's Second Request"), Item 6. Provide additional details concerning necessary pipe replacement in the BTU Gas system due to the use of plastic pipe not approved for distribution, as discussed in the September 18, 2017 telephonic Informal Conference.

3. Refer to the response to Staff's Second Request, Items 3 and 13. Confirm that the cost of the CAD and GIS updates referenced in the response to Item 3 are included in the invoices from Slone Energy, LLC and Keith E. Krejci in Item 13, and that Frontier proposes to include these expenditures in the PRP for cost recovery. If this is correct, provide the annual cost incurred or expected to be incurred and recovered through the PRP for these items, beginning with the first instances of cost incurrence, and continuing as many years as costs are expected to be incurred and charged to the PRP.

4. Refer to the responses to the Attorney General's First Request for Information, Item 16.f. Provide documentation (i.e., invoices or contracts to support the statement "IGS and PSI bill other consulting clients \$150 to \$200 per hour for the same services."



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John S. Lyons  
Acting Executive Director  
Kentucky Public Service Commission  
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DATED: SEP 22 2017

cc: Parties of Record

Case No. 2017-00263

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