

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

Kentucky Frontier Gas Company, LLC ("Frontier"), pursuant to 807 KAR 5:001, is to file with the Commission the original and 10 copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. 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 the 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, Frontier 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.

1. Refer to the third sentence in Item 10 of Frontier's January 18, 2012 complaint ("Frontier's Complaint") which reads: "This segment was identified by Richard Williams to Frontier manager Robert Oxford as being part of BTU in October, 2010." Explain whether the referenced identification was provided verbally or in written form to Mr. Oxford.

2. Refer to the second sentence in Item 7 of the response of Harry Thompson, Wilon Gathering Systems, Inc. ("WGSI"), and Chattaco, Inc. (collectively "WGSI et al.") to Frontier's Complaint. The latter part of the sentence reads, "to the extent that any BTU customers are or were ever connected to the Wilon Pipelines that those connections were made by BTU." Explain whether Frontier has any evidence to refute this statement.

3. Refer to the third sentence in Item 10 of the response of WGSI et al. to Frontier's Complaint which reads: "B.T.U. has always been responsible for providing any gas to its customers, and to the extent that B.T.U. did so through the Wilon


Pipelines it had the contractual right to do so.” Explain whether Frontier has any evidence to dispute WGSJ et al.’s statement indicating that B.T.U. Gas Company, Inc. (“B.T.U.”) served customers via what WGSJ et al. refers to as the “Wilon Pipelines.”

4. Refer to the response to Item 25 of Commission Staff’s Initial Request for Information to WGSJ et al., dated May 21, 2012. The fourth and fifth sentences in the response read: “B.T.U. thereafter used the pipeline in accordance with its contractual rights. B.T.U. can still use the pipeline in accordance with its contractual rights.” Explain whether Frontier, as “Bankruptcy Operator” of B.T.U., has made any attempt to “use the pipeline in accordance with its contractual rights.”

5. On June 11, 2012, Frontier submitted a data request to WGSJ et al., to which, according to the Commission’s records, no response has been filed.

a. The Commission has received no motion to compel from Frontier regarding the lack of response by WGSJ et al. Explain whether Frontier has contacted WGSJ et al. informally about this matter and why Frontier filed no motion to compel.

b. Given its inaction regarding the lack of a response to its data request to WGSJ et al., explain whether anything has changed concerning Frontier’s interest in this matter.



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cc: Parties of Record

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