

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S FIFTH 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 six copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 13, 2018. 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. Provide an updated copy of Frontier's current organizational chart, showing the relationship between Frontier and any affiliated companies, divisions, etc. Include the relative positions of all entities and affiliates with which Frontier routinely has business transactions and provide a detailed description of the relationships between the affiliates.

2. Provide all joint or shared affiliate costs incurred during the calendar year 2017 and the first six months of calendar year 2018 that are allocated to Frontier and to the other affiliates. For each cost, list the vendor, total expense amount, amounts per affiliate, and the basis for allocation.

3. Describe the procedures that are used to allocate joint and shared costs among the various affiliates for the calendar years 2017 and 2018.

4. Provide all internal memoranda, policy statements, correspondence, and documents related to the allocation of joint and shared costs.

5. Identify the service agreement with each affiliate, state whether the service agreement has been previously filed with the Commission, and, if so, identify the proceeding in which it was filed. Provide each service agreement that has not been previously filed with the Commission.

6. Refer to KRS 278.010(18), which defines an affiliate as a person that controls or that is controlled by, or is under common control with, a utility. Refer also to KRS 278.010(19), which defines control as the power to direct the management or policies of a person through ownership, by contract, or otherwise.

a. Confirm that the entities that are both independently and jointly owned by Frontier's owners, Steve Shute, Robert Oxford, Industrial Gas Services, Inc. ("IGS"), and Larry Rich, are all affiliates of Frontier pursuant to the applicable statutes and regulations.

b. If 6(a) is not confirmed, explain in full detail how the entities that are independently and jointly owned by Frontier's owners are not affiliates of Frontier pursuant to the applicable statutes and regulations.

7. Frontier admits in its brief that entities controlled by Steve Shute, Robert Oxford and IGS have common directors with Frontier but avers that those directors have no ability to direct the management of Kentucky Frontier. Further explain the basis for this statement.



Gwen R. Pinson  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED: **JUN 29 2018**

cc: Parties of Record

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