COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

Kentucky Frontier Gas, LLC (Kentucky 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 within 14 days of the entry of this Request for Information. 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.

Kentucky 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 Kentucky 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, Kentucky 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. In Case No. 2019-00018,¹ Kentucky Frontier, and its individual members, Steven Shute, Larry Rich, Industrial Gas Services, Inc. (IGS), and Robert Oxford (collectively, members) applied to transfer approximately 13.6 percent interest in Kentucky Frontier owned by Larry Rich to Steven Shute. The Commission issued a final Order granting the application, subject to certain conditions.

a. Provide an updated copy of Kentucky Frontier's current organizational chart with the percentage ownership that each member has in Kentucky Frontier; show the relationship between Kentucky Frontier and any affiliated companies, division, etc.; display all companies that are owned by each member of Kentucky Frontier; and include the percentage ownership that either Kentucky Frontier or each member has in the individual companies.

¹ Case No. 2019-00018, Joint Application of Kentucky Frontier Gas, LLC and Its Individual Members Steven Shute, Larry Rich, Robert Oxford and IGS, Inc., for Approval of Transfer of Ownership of Larry Rich's Interest to Steven Shute (Mar. 6, 2019).

b. Explain how the voting interest has changed due to Larry Rich no longer being a member of Kentucky Frontier.

2. Provide an updated copy of Kentucky Frontier's bylaws.

3. In response to Commission Staff's Sixth Request for Information, Kentucky Frontier stated that "[i]n an effort to expedite this matter and minimize further review, Kentucky Frontier has included with this response a motion for deviation." Kentucky Frontier simultaneously filed a motion for waiver from the requirements of the affiliate transactions statutes KRS 278.2201 to KRS 278.2213. However, Kentucky Frontier argues in the motion for waiver that it does not have affiliates.

a. Explain why Kentucky Frontier would file a motion for waiver from the affiliate transaction statutes if Kentucky Frontier believes that it does not have affiliates.

b. Explain how the Commission could grant Kentucky Frontier's motion for waiver of the requirements of the affiliate transaction statues KRS 278.2201 to KRS 278.2213 when Kentucky Frontier states in the motion for waiver that it does not have affiliates.

 Explain in specific detail Dennis Horner's role with IGS and with Kentucky Frontier.

R. P. maar

Gwen R. Pinson Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED OCT 0 1 2019

cc: Parties of Record

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