

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION FOR REVISED)	
QUARTERLY GAS COST RECOVERY)	CASE NO.
SCHEDULES FOR KENTUCKY FRONTIER GAS,)	2023-00067
LLC.)	

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

Kentucky Frontier Gas, LLC (Kentucky Frontier), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on August 30, 2023. The Commission directs Kentucky Frontier to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 Kentucky Frontier obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kentucky Frontier fails or refuses to furnish all or part of the requested information, Kentucky 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 and scanned 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. Refer to Kentucky Frontier's response to Commission Staff's First Request for Information (Staff's First Request), Item 2b. Explain why Kentucky Frontier has not proposed modifications to its Pipeline Replacement Program (PRP) and the PRP

surcharge since Kentucky Frontier expanded the PRP program in its last general rate Case No. 2017-00263.²

2. Refer to Kentucky Frontier’s response to Staff’s First Request, Item 3, page 2 of 6. Explain whether Kentucky Frontier attempted to recoup the losses from the damaging party for the gas leaked from the line or for the cost related to repairing the damage made to the line.

3. Refer to Kentucky Frontier’s response to Staff’s First Request, Item 3, page 1 of 6. Provide a detailed breakdown of the steps Kentucky Frontier has taken over the last five-years to locate and map its gas system lines.

4. Refer to Application, pages 2–4, paragraphs 6–7, 9–10.

a. Explain how Kentucky Frontier’s proposed method for calculating the Balancing Adjustment differs from the method described in paragraph 9 of the Application.

b. Explain in detail how Kentucky Frontier’s proposed method for calculating the Balancing Adjustment more accurately “compensates for any under or over collections which have occurred as a result of prior adjustments.”

5. Refer to the Application, page 10, paragraph 14. Explain how Kentucky Frontier selected 7.5 percent as the proposed gas loss limit.

6. Provide example calculations, in as straightforward a manner as possible and using simple example numbers that show how four quarterly GCA filings would be calculated and how subsequent proposed Balancing Adjustments incorporate recoveries from previous adjustments.

² Case No. 2017-00263, *Electronic Application of Kentucky Frontier Gas, LLC for Alternative Rate Adjustment* (filed June 30, 2017).

7. Refer to Kentucky Frontier's Application, Exhibit C, Excel spreadsheet.
 - a. State whether Kentucky Frontier proposes that the Cumulative Over/Under Recovery GBA Balance continue to include all over- and under-recoveries of gas cost from previous quarters as shown in Exhibit C, Excel spreadsheet.
 - b. If so, explain why there is no adjustment for amounts recovered or returned in previous Balancing Adjustments.
 - c. Also, if Kentucky Frontier's proposed method achieves the same kind of reconciliation for past under-/over-recoveries of gas cost as the current method, explain how.
8. Provide the annual percentage of lost and unaccounted for gas for the years 2018–2022.
9. Provide a percentage breakdown of the type of gas loss and unaccounted for gas on the Kentucky Frontier gas system. The breakdown should differentiate between gas that is unaccounted for and gas that is lost due to line damage, theft, leaks, meters, etc.
10. Provide the annual amount of investment Kentucky Frontier allocated to its PRP program for the years 2018–2022.



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DATED AUG 15 2023

cc: Parties of Record

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