

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:

APPLICATION OF KENTUCKY FRONTIER GAS, LLC
FOR APPROVAL OF CONSOLIDATION OF AND
ADJUSTMENT OF RATES, APPROVAL OF AMR
EQUIPMENT AND A CERTIFICATE OF
CONVENIENCE AND NECESSITY FOR
INSTALLATION OF AMR, PIPELINE REPLACEMENT
PROGRAM, REVISION OF NON-RECURRING FEES
AND REVISION OF TARIFFS

JAN 02 2013

PUBLIC SERVICE
COMMISSION

CASE NO.
2011-00443

KENTUCKY FRONTIER GAS, LLC's MOTION TO SUSPEND
PROCEDURAL ORDER

Kentucky Frontier Gas, LLC, (Frontier) by counsel, moves for an order
suspending the procedural schedule and submitting the case on the record.

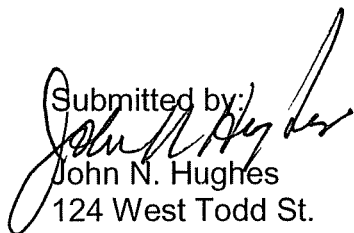
On December 13, 2012, the Commission issued orders granting permissive
intervention to the First Baptist Church of Salyersville (Church) and to Joe and Gloria
Conley (Conley's). Those orders granted the interveners the opportunity to submit data
requests to Frontier and modified the procedural schedule to accommodate additional
discovery and to provide for a hearing at an undetermined date.

On December 26th, the Church filed a motion to amend the December 13th order
to simply allow it informal intervention. No data requests or other pleadings have been
field by the Conley's.

Based on the request for limited intervention by the Church and the lack of
compliance with the order by the Conley's, Frontier moves to suspend the procedural
schedule set forth in the December 13th order. Specifically, Frontier requests that the
discovery provisions be eliminated, that the interveners be treated as limited interveners
for notification purposes only, and that the case be submitted for decision immediately.

Frontier has provided the Commission staff with responses to two data requests and has met with the staff to discuss the issues in the case. Given the detailed amount of information provided and the completion of the staff's discovery, the record is more than adequate on which to base a decision. The financial strain on Frontier of operating the several small utilities it has acquired over the last few years is obvious from the information provided in the case. Any delay in recovering additional revenue will only exacerbate the financial condition of the company. With the primary heating season in progress, it is critical that the proposed rates be placed into effect as quickly as possible.

For these reasons, Frontier moves to suspend the procedural schedule and to submit the case for decision based on the record as it stands.

Submitted by:

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Certification:

I certify that a copy of this motion was mailed to Robin Simpson Smith, Box 216 Prestonsburg, KY 41653 and to Joe and Gloria Conley, 231 Mine Fork Rd., Salyersville, KY 41465 the 2nd day of January, 2013.

