

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|--|---|------------|
| CHARLES E. HARDIN, JR., INDIVIDUALLY AND |) | |
| CHARLES E. HARDIN, JR., MAGOFFIN |) | |
| COUNTY JUDGE EXECUTIVE O/B/O THE |) | |
| MAGOFFIN FISCAL COURT AND |) | |
| CONSUMERS OF MAGOFFIN COUNTY |) | |
| RECEIVING NATURAL GAS SERVICES FROM |) | |
| KENTUCKY FRONTIER GAS, LLC |) | CASE NO. |
| |) | 2014-00038 |
| COMPLAINANTS |) | |
| V. |) | |
| |) | |
| KENTUCKY FRONTIER GAS, LLC |) | |
| |) | |
| DEFENDANT |) | |

COMMISSION STAFF'S INITIAL 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 eight copies of the following information, with a copy to all parties of record. The information requested herein is due on or before July 14, 2014. 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, 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.

1. Refer to the Pipeline Safety Branch Incident Report ("Incident Report-1"), dated February 5, 2014, pertaining to Frontier's loss of service to customers located on the Cow Creek system in Salyersville, Kentucky.

a. Frontier states that there were 203 customers who lost service, with "40 or more people off for 4 hours or more." What was the maximum time that these customers were without service during this period? Provide details about how customers who were without service for 4 hours or more were addressed.

b. Under the Corrective Action section of Incident Report-1, Frontier states that its "long term solution" to the problem is to add a more reliable gas supplier into Magoffin County and that "[a]s of this date, we have made arrangements with EQT for a new tie in that should supply adequate volumes to minimize this issue happening

in the future.” Has this tie in with EQT been made? When was it made? If tie in has not been made, explain when it will be made.

c. The outages described occurred in the Cow Creek area in Salyersville. What other areas of Frontier’s operations were without adequate gas supply during the January 6, 2014, to January 8, 2014 period?

2. Refer to the Pipeline Safety Branch Incident Report (“Incident Report-2”), dated February 21, 2014, pertaining to Frontier’s loss of service to customers from the evening hours of January 23, 2014, until the late afternoon of January 24, 2014.

a. Frontier estimates that there were 40-50 customers who did not have service during this period. What was the maximum period that these customers were without service? Provide details about how customers who lost service during this period were addressed.

b. Frontier states that its long-term solution to this problem is to add a more reliable gas supplier in Magoffin County and that “[w]e have made arrangements with EQT for a new tie in that should supply adequate volumes to minimize this issue happening in the future.” Is this tie in with EQT the same as that listed under the corrective action section of Incident Report-1? Will this tie in be specific to the provision of additional gas supply for the Cow Creek area in Salyersville or is it more general to the entire Frontier system?

3. Other than the long-term solution of an additional tie in with EQT, list any other steps Frontier has taken or is considering to prevent another gas supply shortage should conditions similar to those of the 2013-2014 heating season occur in the future?

4. Describe what efforts Frontier has made to identify additional sources of supply to supplement Frontier's reliance on locally producing wells. If not being done, explain why.

5. Has Frontier investigated the construction of additional tie-in points (gates) to other systems in the area?

6. Is Frontier exploring new wells in the area that may be linkable to any Frontier systems? If so, explain.

7. What effort has Frontier made to enhance or boost the pressure from its existing wells?

8. Has Frontier contacted former suppliers that may be available to it in the future? If so, explain.

9. What safety concerns constrained or prevented Frontier's provision of adequate service to its customers during the timeframes of Incident Report-1 and Incident Report-2?

10. Was Frontier required to rebuild any of its infrastructures due to weather related issues? If yes, describe.

11. Do Frontier's records accurately reflect all repairs made to its system?

12. Did Frontier experience any leaks or repairs due to steel or cast iron pipe failure?

13. Explain why natural gas storage is not an option for Frontier to meet peak demand in the future.

14. Refer to the first attachment to Frontier's March 10, 2014 Answer pertaining to the December 19, 2013 climate predictions/30-day outlook from the National Oceanographic and Atmospheric Administration ("NOAA") for January 2014.

- a. When did Frontier first review this document?
- b. Did Frontier review NOAA's updated monthly outlook for January 2014? If so, when?
- c. Did Frontier rely on these predictions and updated predictions?
- d. Did Frontier modify any of its operations or practices based upon these predictions? If so, explain.

15. Refer to the second attachment to Frontier's March 10, 2014 Answer pertaining to the January 16, 2014 climate predictions/30-day outlook from NOAA for February 2014.

- a. When did Frontier first review this document?
- b. Did Frontier review updated NOAA predictions for February? If so, when?
- c. What reliance did Frontier place on these predictions and updated predictions?
- d. Did Frontier modify any of its operations or practices based upon these predictions? If so, explain.



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DATED JUN 19 2014

cc: Parties of Record

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