

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 EIGHTH 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 21 days of the date of this request. 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 response to Commission Staff's Seventh Request for Information (Staff's Seventh Request), Item 1(b), Kentucky Frontier states that based upon Case No. 2019-00018,¹ Mr. Steven Shute acquired Mr. Larry Rich's vote upon transfer of his ownership share in Kentucky Frontier. Hence, Mr. Shute now has two votes, Mr. Oxford has one vote, and Industrial Gas Services, Inc. (IGS) has one vote. Additionally, Kentucky Frontier's response to Staff's Seventh Request, Item 1(a), states that Mr. Oxford owns IGS in its entirety.

a. Explain in specific detail who has the authority to vote for IGS in Kentucky Frontier matters. Provide all applicable documentation regarding the same.

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* (Ky. PSC Mar. 6, 2019).

b. If the answer to 1.a. above is that someone other than Mr. Oxford has the authority to vote for IGS in Kentucky Frontier matters, then explain how Mr. Oxford, as sole owner of IGS, does not influence or control IGS' vote.

2. Provide all of Kentucky Frontier's Board of Director meeting minutes for calendar years 2017, 2018, 2019, and 2020 up to present date.

3. Refer to Commission Staff's First Request for Information (Staff's First Request), Item 32, Attachment 1. Kentucky Frontier has stated that Mr. Oxford only has one vote, and even though he owns IGS in its entirety, he does not vote for IGS. However, in the November 23, 2015 member manager meeting minutes, it states that Mr. Oxford was present and represented himself and IGS. The minutes further state that topics were discussed and agreed to by a majority vote of the members. Explain in full detail how, based upon these minutes, Kentucky Frontier can assert that Mr. Oxford did not represent and vote for IGS in the November 23, 2015 meeting.

4. In the 2018 Status of Pipeline Replacement Project (PRP) filed January 4, 2019, Kentucky Frontier states that it spent \$22,600 on 15 miscellaneous projects due to leaks, dig-ins, and washouts. Provide a breakdown of costs of each individual project.

5. In the 2018 PRP report filed on April 17, 2019, Kentucky Frontier states that it expended \$1,731 on ERSI/GIS. Provide the status of the ERSI/GIS project, including the total funds expended to date, the percentage completion of the project, and the estimated completion date of the project.

6. Provide a status update for the installation of Automatic Meter Reading meters.

7. Provide a detailed spreadsheet in Excel format with all formulas intact and all cells accessible showing the accounting of the PRP from 2016 to the present date. The spreadsheet should include at a minimum each month's collection of the surcharge from customers and an explanation of each expense or charge to the account including the name of vendor, project name, and items purchased. In addition, provide a detailed explanation for any amounts that have been transferred to Kentucky Frontier from the PRP account.



J.E.B. Pinney
Acting General Counsel
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED: FEB 12 2020

cc: Parties of Record

*Honorable John N Hughes
Attorney at Law
124 West Todd Street
Frankfort, KENTUCKY 40601

*Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Kentucky Frontier Gas, LLC
4891 Independence Street, Suite 200
Wheat Ridge, CO 80033

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204