

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 statutes KRS 278.2201 to KRS 278.2213 when Kentucky Frontier states in the motion for waiver that it does not have affiliates.

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



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cc: Parties of Record

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