

RECEIVED

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

OCT 25 2019

PUBLIC SERVICE  
COMMISSION

KENTUCKY FRONTIER GAS, LLC )  
ALLEGED VIOLATION OF UNDERGROUND ) CASE NO. 2019-00280  
FACILITY DAMAGE PREVENTION ACT )

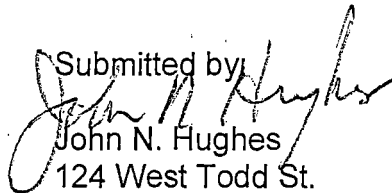
MOTION FOR DEVIATION

Kentucky Frontier Gas, LLC (Frontier) moves to deviate from the order dated October 11, 2019, which requires filing of an original and ten copies of responses.

Question 1(c) requests copies of maps of each gas system Frontier has acquired. The size and number of pages of maps is voluminous. Frontier moves to file one paper copy of all maps and 10 copies in electronic format.

Producing the required original and 10 copies in paper medium for the request will be very expensive and unduly burdensome. This alternative method of production of documents will provide the Commission with the requested information.

For these reasons Frontier requests that the Commission permit it to deviate pursuant to from 807 KAR 5:001, Section 22 and to file in electronic format on electronic storage media the maps requested in DR 1-1(c).

Submitted by  
  
John N. Hughes  
124 West Todd St.  
Frankfort, KY 40601  
502 227 7270  
Attorney for Kentucky Frontier Gas, LLC