

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
FRONTIER GAS, LLC FOR AN ALTERNATIVE)	CASE NO.
RATE FILING PURSUANT TO 807 KAR 5:076)	2025-00277
AND OTHER GENERAL RELIEF)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO KENTUCKY FRONTIER GAS, LLC

Kentucky Frontier Gas, LLC (Kentucky Frontier), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on November 19, 2025. The Commission directs Kentucky Frontier to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 Kentucky Frontier obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Kentucky Frontier fails or refuses to furnish all or part of the requested information, Kentucky Frontier shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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. Refer to Kentucky Frontier's Response to Commission Staff's First Request for Information (Staff's First Request), Item 2.

a. Explain, in detail, the Atlantic Seaboard method to allocate costs among rate classes and how this method may differ from other standard rate class allocation methodologies.

b. Provide a copy of the order and docket number for the Wyoming case in which the parties agreed to use the Atlantic Seaboard method referenced in the response.

c. Explain whether Kentucky Frontier considered any other rate class allocation methodologies for this proceeding.

2. Refer to Kentucky Frontier's Response to Staff's First Request, Item 6a. The response filed was unresponsive. Item 6a requested general ledgers for the years ended December 31, 2023 and 2024. Provide the requested information in Item 6a that was not included in Kentucky Frontier's Response to Staff's First Request.

3. Refer to Kentucky Frontier's Response to Staff's First Request, Item 8. The response filed was unresponsive. Item 8 requested a copy of the most recent invoice for each employee benefit(s) offered to Kentucky Frontier's employees. Kentucky Frontier stated recent invoices would be attached, but Staff could not locate these invoices in the filing. Provide the requested information.

4. Refer to Kentucky Frontier's Response to Staff's First Request, Item 8.

a. Provide an explanation for how Kentucky Frontier determined that \$80 per month was an appropriate contribution amount for its employees.

b. Confirm that for the family medical plan, the employee only pays full cost for additional dependents and whether that employee still pays the \$80 per month as well. If not confirmed, provide an explanation and specific contributions required for additional dependents.

5. Refer to Kentucky Frontier's Response to Staff's First Request, Item 6b and application, Schedule of Adjusted Operations (SAO). Provide a cross-reference matching

each trial balance account to each SAO and reconcile or provide an explanation for each one that is different.

6. Refer to Kentucky Frontier's Response to Staff's First Request, Item 6. Provide an explanation to why Auxier Road Gas has separate accounting books than Kentucky Frontier while other gas companies acquired by Kentucky Frontier do not.

7. Refer to the attachment to Kentucky Frontier's Response to Staff's First Request, Item 9, Excel Attachment for Responses to DR1, Tab DR1-9 Payroll. Provide a calculation for the pro forma wages in Excel spreadsheet format with employee names redacted, as well as all formulas, rows, and columns fully accessible and unprotected.

8. Refer to the Application, Schedule of Adjusted Operations, Reference H. Provide a contract or any supporting documentation to explain the \$90,000 in rate case expenses, including any invoices. Consider this an ongoing request and provide monthly updates on the actual rate case expense.

9. Refer to the Application, ARF FORM 1 – Attachment SR, page 1 of 2. Confirm whether the date listed of January 22, 2018, is the date the consolidation of the former customers of Public Gas Company into Kentucky Frontier actually occurred and the date the consolidation was approved was in Case No. 2017-00263 by Order dated December 22, 2017.²

10. Refer to the Application, ARF FORM-1, unnumbered pdf pages 15–16. Provide a version of the Cost of Service Allocation in Excel spreadsheet format with all formulas, rows, and columns fully accessible and unprotected.

² See Case No. 2017-00263, *Electronic Application of Kentucky Frontier Gas, LLC for Alternative Rate Adjustment*, December 22, 2017 Order.

11. Refer to the Application, ARF FORM-1, unnumbered pdf pages 15–16. Provide a detailed, step by step, explanation of Kentucky Frontier’s methodology for determining its cost of service allocation. The response should include an explanation how Kentucky Frontier determined the values used in the calculation.

12. Refer to the Application, Supplemental Information, page 2. Regarding the statement, “[t]he Kentucky Frontier technicians almost always have more OQs for more Covered Tasks than the five large local distribution companies [LDCs] employees.” Explain what Kentucky Frontier means by ‘Covered Tasks’ in the context of this statement.

13. Refer to the Application, Supplemental Information, pages 3–4. Regarding Kentucky Frontier not owning the gathering line(s) yet still providing service to those customers that have Farm Tap status under KRS 278.485.

a. Provide a copy of the agreement between the owner(s) of the gathering line(s) and Kentucky Frontier.

b. Explain Kentucky Frontier’s responsibility for these customers and how the service Kentucky Frontier provides differs from the service Kentucky Frontier provides for its LDC tariffed rate customers.

c. Explain how Kentucky Frontier is compensated by the owner of the gathering line(s).

d. Explain who is responsible for the odorization of the natural gas.

e. Explain who is responsible for the removal of illegitimate tap-ons onto the gathering line(s).

f. Explain who is responsible for maintenance on the gather line(s).

14. Refer to the Application, Supplemental Information, pages 3–4. Regarding to Kentucky Frontier’s Farm taps that are all supplied by producer pipelines not controlled by Kentucky Frontier.

a. Explain what occurs in situations if the gathering line(s) not owned by Kentucky Frontier were to experience a disruption of natural gas either due to depleted wells or if the lines were to just be abandoned.

b. Identify any instances where Kentucky Frontier has ever purchased natural gas to supply its Farm Tap customers when the producer pipelines were unable to meet the Farm Tap customer needs.



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DATED NOV 3 2025

cc: Parties of Record

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