

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	CASE NO.
FRONTIER GAS, LLC FOR A DECLARATORY)	2025-00042
ORDER ON FREE GAS)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KATHY HOWARD

Kathy Howard, pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on March 18, 2026. The Commission directs Kathy Howard 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 response is

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).

true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kathy Howard shall make timely amendment to any prior response if Kathy Howard 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 Kathy Howard fails or refuses to furnish all or part of the requested information, Kathy Howard shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should 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, Kathy Howard 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 Response to Motion to Submit,² page 4, regarding the consideration received for the natural gas pipeline right-of-way and easement over Kathy Howard's property located at 12565 SE Licking River Road, Salyersville, Kentucky 41465 (Howard/Allen Property). Explain how the documents provided require Kentucky Frontier to provide free gas service to Kathy Howard at the Howard/Allen Property.

² Kathy Howard's Response to Motion to Submit (Response) (filed Jan. 22, 2026).

2. Response to Motion to Submit,³ page 4, regarding the consideration for the natural gas pipeline easement and right-of-way over the Howard/Allen Property. State when Kentucky Frontier refused to pay the consideration for the natural gas pipeline easement and right-of-way over the Howard/Allen Property and the amount of consideration requested.

3. Refer to Response to Motion to Submit,⁴ page 4, regarding Kathy Howard's request for the fair market value of her property before and after the construction of the natural gas pipeline over the Howard/Allen property by BTU Gas Company, Inc. State the fair market value of the Howard/Allen Property before and after the construction of the natural gas pipeline.

4. Provide the dates for any communication with BTU Gas Company or Kentucky Frontier regarding free gas and explain the reason for the communication.

5. Provide any additional documents filed in Case No. 2026-CI-00030.⁵ This data request is continuing and should be updated in a supplemental filing as additional information becomes available.

³ Response at 4.

⁴ Response at 4.

⁵ *Coty Brown and Lindsey Brown; Linda Sue Brown; Ryan Allen, Kathy Howard; Ricki Carty; Chrystal Shawn Risner v. Kentucky Frontier Gas, LLC*, Magoffin Circuit Court, Civil Action No. 26-CI-00030 (filed Jan. 20, 2026).

Linda Bridwell 

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DATED **MAR 03 2026**

cc: Parties of Record

Case No. 2025-00042

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