

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 COTY BROWN AND LINDSEY BROWN

Coty Brown and Lindsey Brown (Brown Intervenors), 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 the Brown Intervenors 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.

The Brown Intervenors shall make timely amendment to any prior response if they 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 the Brown Intervenors fail or refuse to furnish all or part of the requested information, the Brown Intervenors shall provide a written explanation of the specific grounds for their 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, the Brown Intervenors 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 the Response to Motion to Submit,² page 4, regarding the consideration received for the natural gas pipeline right-of-way and easement over 3073 Long Creek Road, Salyersville, Kentucky 41465 (the Brown Property). Explain how the documents provided require Kentucky Frontier to provide free gas service to the Brown Intervenors at the Brown Property.

² Joint Response to Motion to Submit (Response) (filed Jan. 22, 2026).

2. Refer to the Response to Motion to Submit,³ page 4, regarding the consideration for the natural gas pipeline easement and right-of-way over the property owned by the Brown Intervenors. State when Kentucky Frontier refused to pay the consideration for the natural gas pipeline easement and right-of-way over the Brown Property and the amount of consideration requested.

3. Refer to the Response to Motion to Submit,⁴ page 4, regarding the Brown Intervenors' request for the fair market value of their property before and after the construction of the natural gas pipeline over their property by BTU Gas Company, Inc. State the fair market value of the property before and after the construction of the natural gas pipeline and provide any evidence used to calculate or estimate the stated property value.

4. Refer to the Reply Response to Request for Intervention of the Brown Intervenors.⁵ Explain how the referenced documents require Kentucky Frontier to provide free gas service.

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

³ Response at 4.

⁴ Response at 4.

⁵ Reply Response to Request for Intervention of Coty Brown and Lindsey Brown (Reply) (filed Dec. 23, 2025).

6. Provide any additional documents filed in Case No. 2026-CI-00030.⁶ This data request is continuing and should be updated in a supplemental filing as additional information becomes available



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DATED **MAR 04 2026**

cc: Parties of Record

⁶ *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).

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