

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>ELECTRONIC APPLICATION OF KENTUCKY FRONTIER )</b>	<b>CASE NO.</b>
<b>GAS, LLC FOR ALTERNATIVE RATE ADJUSTMENT )</b>	<b>2017-00263</b>

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**RESPONSE TO COMMISSION’S APRIL 16, 2024 ORDER AND  
MOTION FOR EXTENSION OF TIME TO FILE ITS 2022 AND  
2023 ANNUAL PRP REPORTS AND TO CHANGE THE DUE  
DATE FOR THE ANNUAL PRP REPORT FILINGS**

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Comes now Kentucky Frontier Gas, LLC (“Kentucky Frontier”), by and through the undersigned counsel and hereby tenders its: 1) response to the Commission’s April 16, 2024 Order; 2) motion for extension of time to file its 2022 and 2023 annual pipeline replacement program (“PRP”) reports; and 3) motion to change the due date for the annual PRP reports to April 15<sup>th</sup> of each year, and hereby states as follows:

1. Kentucky Frontier appears to have completed its 2022 Annual PRP Report but it was not filed in this proceeding. This past year has been an extremely taxing year for Kentucky Frontier and its sole member, Steve Shute. The tragic death of his son Joel, in an avalanche while snow skiing, in March 2023 has affected Mr. Shute both personally and professionally. His son assisted him in the operations of Kentucky Frontier and his loss has meant additional responsibilities falling to Mr. Shute. In addition, Kentucky Frontier has had multiple cases pending before the Commission and state courts. Kentucky Frontier was also transitioning from its long-time attorney who was in the process of semi-retiring. The filing of the 2022 Annual PRP Report in this case was apparently overlooked.

2. In July 2023, Steve Shute provided the 2022 Annual PRP Report to counsel during the time that Kentucky Frontier was responding to Commission Staff's First Request for Information in Case No. 2023-00067<sup>1</sup>. The 2022 Annual PRP Report was filed as an attachment to Kentucky Frontier's response to Commission Staff's First Request for Information, Item 3 on August 2, 2023.<sup>2</sup> It was filed as supporting documentation for the efforts undertaken by Kentucky Frontier to reduce its line loss.

3. The 2022 Annual PRP Report was only filed in Case No. 2023-00067, on August 2, 2023 and was not also filed in this proceeding, as Mr. Shute assumed. Kentucky Frontier moves the Commission for an extension of time to file the 2022 Annual PRP Report in this proceeding, for the reasons stated above, and has attached a copy of the report to this filing. In addition to the 2022 Annual PRP Report, Kentucky Frontier is also filing the 2022 PRP Surcharge and Plant Additions file that is normally filed with the fourth quarter banking statements which was not filed with the 2022 fourth quarter banking statements.

4. Kentucky Frontier hereby files its 2023 Annual PRP Report, which includes its plans for 2024 PRP and moves the Commission to grant an extension of time to file its 2023 Annual PRP Report. In addition, Kentucky Frontier is filing the 2023 Annual PRP Surcharge and Plant Additions file that is normally filed with the fourth quarter banking statements which was not filed with the 2023 fourth quarter banking statements.

5. Kentucky Frontier moves the Commission to change the due date for future Annual PRP Reports to April 15<sup>th</sup> of each year. Filing by December 31 prevents any meaningful numbers

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<sup>1</sup> *Electronic Application for Revised Quarterly Gas Cost Recovery Schedules for Kentucky Frontier Gas, LLC*, Case No. 2023-00067, Commission Staff's First Request for Information to Kentucky Frontier Gas, LLC, (Ky. P.S.C. July 19, 2023).

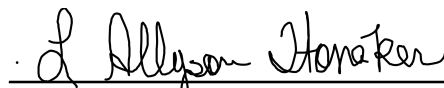
<sup>2</sup> *Id.* at Response 3, pp 4-6 of 6.

for the collections of PRP surcharges or the final cost of PRP projects, which are two major components of the PRP report. This would push the filing past the extremely busy time of year where numerous year-end items have to be completed to close out Kentucky Frontier's annual financials, various State and County requirements, file its annual reports with the Commission that are due on March 31<sup>st</sup> and still have two weeks to finalize the Annual PRP Reports. All such annual filings are done by 2-3 people in Frontier, who are the only ones familiar with these special topics. It would also make the filing due after the quarterly GCA filing for the first quarter. This would alleviate some of the burden that is placed upon Kentucky Frontier and Mr. Shute during an extremely busy time of year.

WHEREFORE, Kentucky Frontier moves the Commission to grant an extension of time to file its 2022 and 2023 Annual PRP Reports, to change the due date for future Annual PRP Reports to April 15<sup>th</sup> of each year and to accept the 2022 and 2023 Annual PRP Reports filed contemporaneously with this filing.

Dated this 19<sup>th</sup> day of April 2024.

Respectfully submitted,



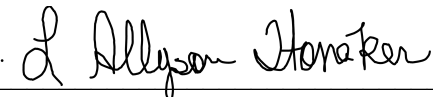
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L. Allyson Honaker  
Brittany Hayes Koenig  
HONAKER LAW OFFICE, PLLC  
1795 Alysheba Way, Suite 6202  
Lexington, Kentucky 40509  
(859) 368-8803  
allyson@hloky.com  
brittany@hloky.com

*Counsel for Kentucky Frontier Gas, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing was transmitted to the Commission on April 19, 2024 that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of the filing will be made.

  
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*Counsel for Kentucky Frontier Gas, LLC*