

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC PURCHASED GAS)	
ADJUSTMENT FILING OF)	CASE NO.
KENTUCKY FRONTIER GAS, LLC)	2021-00408

**MOTION TO WITHDRAW APPLICATION and EXTENSION TO
RESPOND TO COMMISSION STAFF’S REQUEST FOR
INFORMATION**

Comes now Kentucky Frontier Gas, LLC (“Kentucky Frontier”), by and through the undersigned counsel and hereby moves the Commission to allow Kentucky Frontier to withdraw the Application in this proceeding and to grant an extension to respond to Commission Staff’s Request for Information. As grounds for the motions Kentucky Frontier respectfully states as follows:

Further, Kentucky Frontier requests the Commission grant its motion to withdraw this electronic purchased gas adjustment and as grounds for this motion, Kentucky Frontier states as follows:

1. Kentucky Frontier filed its application in this matter for a purchased gas adjustment for farm taps on October 27, 2021.
2. On November 29, 2021, the Commission suspended this matter up to and including April 30, 2022.
3. Kentucky Frontier responded to Commission Staff’s First Requests for Information on December 10, 2021 and filed a supplemental response on December 13, 2021.

4. For over two years, nothing was filed into the record of this proceeding. The next filing in this record was Commission Staff's Second Request for Information on April 26, 2024.

5. This application was filed at a time when the gas costs were increasing and was filed specifically for its farm taps. Since the filing of this application, Kentucky Frontier has had numerous filings with the Commission to attempt to develop a new approach to its Purchased Gas Adjustment filings.

6. Kentucky Frontier has begun the process of preparing an alternative rate adjustment to file with the Commission sometime in 2024. Kentucky Frontier believes that the rate filing will be the best place to address any needed changes to its farm tap rates and therefore moves the Commission to allow Kentucky Frontier to withdraw the Application in this proceeding.

7. The subject matter on this case no longer addresses the relevant issues facing Kentucky Frontier, and the updated issues facing Kentucky Frontier will be addressed in its rate case filing.

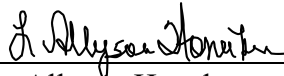
8. In addition to the motion to withdraw the Application, Kentucky Frontier moves the Commission to grant an extension to respond to the data requests issued in this matter on April 26, 2024. The information requested in those requests will take a large amount of hours to gather. Furthermore, if the Commission grants the motion to withdraw the Application, the data requests will not need to be responded to.

9. Therefore, Kentucky Frontier requests an extension of time to respond to the April 26, 2024 data requests. If the Commission grants the motion to withdraw the application the motion for an extension of time will be moot. However, if the Commission denies Kentucky Frontier's motion to withdraw the application, Kentucky Frontier requests an extension for one month after the date of the Commission's Order to respond to data requests.

10. WHEREFORE, Kentucky Frontier requests the Commission grant Kentucky Frontier's Motion to Withdraw this Application for Purchased Gas Adjustment for farm taps and in the alternative to grant a one-month extension from the date of entry of an order denying the motion to withdraw to respond to data requests.

Dated this 10th day of May, 2024.

Respectfully submitted,

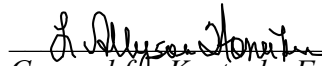


L. Allyson Honaker
HONAKER LAW OFFICE, PLLC
1795 Alysheba Way, Suite 6202
Lexington, Kentucky 40509
(859) 368-8803
allyson@hloky.com

Counsel for Kentucky Frontier Gas, LLC.

CERTIFICATE OF SERVICE

This is to certify that foregoing electronic filing was transmitted to the Commission on May 10, 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.



Counsel for Kentucky Frontier Gas, LLC.