

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

**IN THE MATTER OF:**

ELECTRONIC INVESTIGATION OF JURISDICTIONAL	)	
STATUS OF EAST KENTUCKY MIDSTREAM, LLC	)	CASE NO.
AND OF ITS COMPLAINT WITH KRS CHAPTER 278,	)	2022-00238
807 KAR CHAPTER 005, AND 49 CFR PARTS 191 AND 192	)	

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**KENTUCKY FRONTIER GAS, LLC’S REQUEST  
FOR PUBLIC HEARING**

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Comes now Kentucky Frontier Gas, LLC (“Kentucky Frontier”), by and through counsel, pursuant to the August 30, 2024 Order (“August 30<sup>th</sup> Order”) of the Kentucky Public Service Commission (“Commission”) and other applicable law, and hereby requests the Commission to set this matter for a formal hearing. In support of this request, Kentucky Frontier respectfully states as follows:

The Commission’s entered an Order on August 11, 2022 and entered an Order on August 12, 2022 expanding the scope of the proceeding to investigate the jurisdictional status of East Kentucky Midstream, LLC (“EKM”) and to investigate the compliance of EKM with multiple state and federal statutes and regulations. The Attorney General’s Office was granted intervention in the proceeding on August 22, 2022. The parties participated in a formal conference on October 14, 2022. Discovery has been conducted and testimony has been filed by Kentucky Frontier and EKM.

On June 22, 2023, the Commission conducted depositions of EKM and Kentucky Frontier personnel. In addition, the Commission issued an Order on March 25, 2024, engaging the services of Sander Resources LLC to conduct a full inspection of EKM’s system. A report by Sander

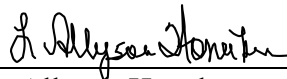
Resources, LLC was filed into the record on July 16, 2024. Both EKM and Kentucky Frontier filed comments regarding the Sander Resources, LLC report on July 22, 2024.

Kentucky Frontier requests that a public hearing be scheduled in this matter. Due to the complex nature of the proceeding and the technical information involved, Kentucky Frontier believes that a hearing in this matter would be beneficial to all parties and to the Commission in determining the jurisdictional status of EKM.

WHEREFORE, on the basis of the foregoing, Kentucky Frontier respectfully requests the Commission to schedule a formal hearing in this matter.

This 30<sup>th</sup> day of September, 2024.

Respectfully submitted,



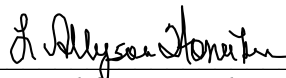
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L. Allyson Honaker  
HONAKER LAW OFFICE, PLLC  
1795 Alysheba Way, Suite 1203  
Lexington, KY 40509  
(859) 368-8803  
allyson@hloky.com

*Counsel for Kentucky Frontier Gas, LLC.*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing electronic filing was transmitted to the Commission on September 30, 2024 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be filed.



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*Counsel for Kentucky Frontier Gas, LLC*