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 COMPLAINCE WITH KRS CHAPTER 278,)	2022-00238
807 KAR CHAPTER 005, AND 49 CFR PARTS 191 AND 192)	

KENTUCKY FRONTIER GAS, LLC'S REQUEST FOR PUBLIC HEARING

Comes now Kentucky Frontier Gas, LLC ("Kentucky Frontier"), by and through counsel, pursuant to the September 7, 2022 Order ("September 7th Order") of the Kentucky Public Service Commission ("Commission") and other applicable law, and hereby requests the Commission set this matter for a public 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.

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 30th day of November, 2022.

Respectfully submitted,

Ally Ston

L. Allyson Honaker HONAKER LAW OFFICE, PLLC 1795 Alysheba Way, Suite 6202 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 November 30, 2022 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.

Counsel for Kentucky Frontier Gas, LLC