

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

<b>ELECTRONIC INVESTIGATION OF</b>	)	
<b>JURISDICTIONAL STATUS OF EAST</b>	)	
<b>KENTUCKY MIDSTREAM, LLC, AND</b>	)	<b>Case No. 2022-00238</b>
<b>OF ITS COMPLIANCE WITH KRS</b>	)	
<b>CHAPTER 278, 807 KAR CHAPTER 005,</b>	)	
<b>AND 49 CFR PARTS 191 AND 192</b>	)	

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**ATTORNEY GENERAL’S REPLY BRIEF**

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Pursuant to the Commission’s Order of December 20, 2022, the Attorney General of the Commonwealth of Kentucky, through his Office of Rate Intervention, hereby submits this Reply Brief in the above styled matter.

Kentucky Frontier Gas, LLC (“Kentucky Frontier”) and East Kentucky Midstream, LLC (“EKM”) both filed Initial Briefs on January 20, 2023. Those Initial Briefs articulate clearly the legal issues presented in this case. The Commission has developed a factual record through a discovery process that allowed for multiple sets of data requests, the filing of written testimony, and a Formal Conference at which considerable information was presented. Kentucky Frontier and EKM have laid out the respective legal arguments for whether and to what extent the Commission’s jurisdiction extends to the operation of EKM. Thus, this case is properly before the Commission for decision.

Therefore, the Attorney General requests that the Commission consider the best interests of ratepayers, to the extent possible, as it determines its prescribed legal

jurisdiction and authority under the relevant statutes.

Respectfully submitted,

DANIEL J. CAMERON  
ATTORNEY GENERAL



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J. MICHAEL WEST  
LAWRENCE W. COOK  
ANGELA M. GOAD  
JOHN G. HORNE II  
ASSISTANT ATTORNEYS GENERAL  
1024 CAPITAL CENTER DRIVE, SUITE 200  
FRANKFORT, KY40601  
PHONE: (502) 696-5433  
FAX: (502) 564-2698  
[Michael.West@ky.gov](mailto:Michael.West@ky.gov)  
[Larry.Cook@ky.gov](mailto:Larry.Cook@ky.gov)  
[Angela.Goad@ky.gov](mailto:Angela.Goad@ky.gov)  
[John.Horne@ky.gov](mailto:John.Horne@ky.gov)

*Certificate of Service and Filing*

Pursuant to the Commission's Orders and in accord with all other applicable law, Counsel certifies that, on February 9, 2023, an electronic copy of the forgoing was served by the PSC electronic filing system to the following.

allyson@hloky.com; jbentley@mmlk.com; keckert@mcbayerfirm.com;  
steve@pipelinegroup.com

this 9th day of February, 2023.



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Assistant Attorney General