### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

### IN THE MATTER OF:

ELECTRONIC PURCHASED GAS ADJUSTMENT FILING ) CASE NO. OF KENTUCKY FRONTIER GAS, LLC ) 2022-00327

# MOTION FOR DEVIATION

Comes now Kentucky Frontier Gas, LLC ("Kentucky Frontier") by and through the undersigned counsel, and does hereby state as follows for its Motion for Deviation from the thirty day notice requirement set forth in KRS 278.180. In support of this Motion, Kentucky Frontier respectfully states as follows:

- 1. Kentucky Frontier filed its Notice of Election to Use Electronic Filing Procedures in this case on September 26, 2022.
- 2. Kentucky Frontier has discovered that it has incurred an approximate \$600,000 gas balance loss since November 2020. Kentucky Frontier has been working with Commission Staff to determine how this has occurred and why this loss was not accounted for in the quarterly purchased gas adjustment filings.
- 3. Kentucky Frontier is requesting to shorten the notice period from thirty days to twenty days for the current purchased gas adjustment filing, in order to give Kentucky Frontier and Commission Staff more time to determine what amendments need to be made to Kentucky Frontier's purchased gas adjustment filings for the current filing as well as future filings to ensure that this type of loss does not go unaccounted for in the future.

WHEREFORE, based on the foregoing, Kentucky Frontier requests the Commission to grant it a deviation from the thirty-day notice requirement in KRS 278.180 and allow Kentucky

Frontier to file its purchased gas adjustment filing on or before October 11, 2022 which would provide twenty days' notice to the Commission.

Dated this 2<sup>nd</sup> of October, 2022.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing was transmitted to the Commission on October 2, 2022; 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