COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC PURCHASED GAS ADJUSTMENT FILING)	CASE NO.
OF KENTUCKY FRONTIER GAS, LLC)	2022-00428

MOTION TO WITHDRAW

Comes now Kentucky Frontier Gas, LLC ("Kentucky Frontier") by and through the undersigned counsel, and moves the Commission to grant it permission to withdraw its tariff filing and supporting documents of November 30, 2022, which the Commission opened this case to investigate. The filed 28th revised Tariff Sheet No. 4, canceling the 27th revised Tariff Sheet No. 4, including a gas cost reconciliation adjustment was filed in the tariff filing system and included supporting documents. In support of this Motion, Kentucky Frontier respectfully states as follows:

1. The Commission's January 31, 2023 Order in Case No. 2022-00434 rejecting the quarterly gas cost recovery (GCR) rate report filed on December 30, 2022 and corresponding tariff, stated that the November 30, 2022 tariff filing should also be rejected:

Assuming it was appropriately filed and noticed, suspending the current proposed tariff filings to investigate the \$0.10 per Ccf gas cost reconciliation charge would cause additional administrative burden as there are already active cases open before the Commission that address the investigation of that proposed gas cost reconciliation charge. Because the proposed tariff filing includes the gas cost reconciliation information filed in Case No. 2022-00428 and the proposed GCR rate proposed in this case proceeding, the Commission finds that the proposed tariff filing should also be denied.

2. In order to clarify the record, Kentucky Frontier moves the Commission to allow it to withdraw its proposed revision to its GCR mechanism filed on November 30, 2022.

WHEREFORE, based on the foregoing, Kentucky Frontier requests the Commission grant its motion.

Dated this 16th of February, 2023.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on February 16 2023; 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.

Buttany H. Krenis Counsel for Kentucky Frontier Gas, LLC