COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC PURCHASED GAS ADJUSTMENT FILING)	CASE NO.
OF KENTUCKY FRONTIER GAS, LLC)	2023-00049

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 for Kentucky Frontier's Quarterly Purchased Gas Adjustment ("PGA") filing. 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 February 8, 2023.
- 2. Kentucky Frontier was ordered by the Commission to refile its quarterly PGA filing in the Commission's January 31, 2023 Order in Case No. 2022-00434.¹
- 3. Kentucky Frontier discovered that it has incurred an approximate \$600,000 gas balance loss since November 2020. Kentucky Frontier had proposed to amend its GCA in its quarterly PGA filed in Case No. 2022-00434 on December 30, 2022.
- 3. Due to the Commission's January 31, 2023 Order and Kentucky Frontier having to refile its quarterly PGA filing, Kentucky Frontier is requesting to shorten the notice period from

¹ Case No. 2022-00434, Electronic Purchased Gas Adjustment Filing of Kentucky Frontier Gas, LLC (Ky PSC Jan.31, 2023). Commission's January 31, 2023 Order was simultaneously filed in Case No. 2022-00327, Electronic Purchased Gas Adjustment Filing of Kentucky Frontier Gas, LLC and Case No. 2022-00428, Electronic Tariff Filing of Kentucky Frontier Gas, LLC to Implement a Gas Cost Reconciliation.

thirty days to twenty days for the current purchased gas adjustment filing, in order to allow the billing cycle to sync with the purchased gas adjustment and allow for the most efficient use of financial and administrative resources. Due to the recent change in gas prices, Kentucky Frontier's PGA in effect currently is higher than what the customers would have had to pay if the PGA provided herein were in effect. Kentucky Frontier requests that the new PGA contained in this filing be effective March 1, 2023.

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 put its purchased gas adjustment rates contained in this filing into effect on or before March 1, 2023 which would provide twenty days' notice to the Commission.

Dated this 9th of February, 2023.

Respectfully submitted,

L. Allyson Honaker

Brittany Hayes Koenig

HONAKER LAW OFFICE, PLLC

1795 Alysheba Way, Suite 6202

Lexington, Kentucky 40509

Buttany H. Krewy

(859) 368-8803

allyson@hloky.com

Counsel for Kentucky Frontier Gas, LLC

CERTIFICATE OF SERVICE

This is to certify that foregoing electronic filing was transmitted to the Commission on February 9, 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.

Counsel for Kentucky Frontier Gas, LLC