#### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

#### IN THE MATTER OF:

ELECTRONIC APPLICATION FOR REVISED	)	
QUARTERLY GAS COST RECOVERY	)	CASE NO.
SCHEDULES OF KENTUCKY	)	2023-00067
FRONTIER GAS, LLC	)	

# MOTION FOR EXPEDITED REVIEW

Comes now Kentucky Frontier Gas, LLC ("Kentucky Frontier") by and through the undersigned counsel, and does hereby state as follows for its Motion for Expedited Review to allow Kentucky Frontier to file its quarterly gas cost recovery ("GCR") filing by March 31, 2023 and 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 22, 2023.
- 2. Kentucky Frontier discovered in June 2022 that it incurred an approximate \$600,000 gas balance loss since November 2020. While the amount of the under recovery has varied with the changing price of gas, it remains a significant amount for a gas company that is the size of Kentucky Frontier to absorb.
- 3. Kentucky Frontier has been working diligently to determine how this has occurred and why this loss was not accounted for in the quarterly GCR filings since the discovery of the under recovery.
- 4. Kentucky Frontier has proposed multiple revisions to its GCR processes as part of its quarterly GCR filings and as part of changes to its tariff. Kentucky Frontier has noted the administrative burden the Commission referenced in its January 31, 2023 Order in Case No. 2022-

00434, Electronic Purchase Gas Adjustment Filing of Kentucky Frontier Gas, LLC, and believes

that filing the request for a revision to its schedules as a separate case was the most efficient way

to propose a possible solution to its significant under recovery because Kentucky Frontier has a

duty to continue to provide reasonable service to its customers.

5. Finally, Kentucky Frontier's proposed changes in this case provide additional

transparency and additional information for the customers, the Commission, and the utility which

will benefit all concerned the quicker the changes can be implemented. Kentucky Frontier is

willing to meet with the Commission formally or informally to provide any additional information

it requires to render its decision on or before March 31, 2023, which would allow Kentucky

Frontier to implement any changes that result from the Commission's Order in this matter into its

next quarterly GCR filing.

WHEREFORE, based on the foregoing, Kentucky Frontier requests the Commission to

grant its motion for expedited review regarding its proposed revisions to the schedules it provides

with its quarterly GCR filings to allow Kentucky Frontier to file its quarterly GGR filing on or

before March 31, 2023.

Dated this 24<sup>th</sup> day of February, 2023.

Respectfully submitted,

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# **CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing was transmitted to the Commission on February 24, 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