

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	Case No.
FRONTIER GAS, LLC FOR A DECLARATORY)	2025-00042
ORDER ON FREE GAS)	

RESPONSES TO STAFF'S SECOND INFORMATION REQUEST

TO KENTUCKY FRONTIER GAS, LLC

DATED DECEMBER 17, 2025

Filed: January 5, 2026

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY FRONTIER)
GAS, LLC FOR DECLARATORY ORDER ON FREE GAS)**

CASE NO.
2025-00042

VERIFICATION OF STEVEN SHUTE

COMMONWEALTH OF KENTUCKY)
COUNTY OF FAYETTE)

Steve Shute, Sole Member of Kentucky Frontier Gas, LLC, being duly sworn, states that he has supervised the preparation of these responses to data requests in the above-referenced case and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.

Steven Shute

The foregoing Verification was signed, acknowledged and sworn to before me this 5th day of January, 2026 by Steven Shute.

L Allyn Horatz

Notary Commission No. **KYNP 74727**

Commission expiration: 8/2/20



KENTUCKY FRONTIER GAS, LLC

CASE NO. 2025-00042

SECOND REQUEST FOR INFORMATION RESPONSE

STAFF'S REQUEST DATED DECEMBER 17, 2025

REQUEST 1

RESPONSIBLE PARTY: **Steve Shute**

Request 1. Refer to requests for intervention in this proceeding.¹ For each intervenor, state whether Kentucky Frontier has communicated with these customers other than providing notice of this matter. If so, providing a summary of those communications.

Response 1. Kentucky Frontier had no contact with the intervenors before filing this application. The intervenors were not mailed notice of this matter at the time of the filing; they are not customers of Kentucky Frontier. Kentucky Frontier had not heard of five of the seven intervenors, who are not on the list of owners that Kentucky Frontier had and was provided in discovery. After the filing, the Kentucky Frontier operations manager spoke briefly with Ryan Allen and Coty and Linda Brown.

¹ Riki Carty and Chrystal Shawn Risner's Motion to Intervene (filed Dec. 11, 2025); Kathy Howard's Motion to Intervene (filed Dec 10, 2025); Ryan Allen's Motion to Intervene (filed Dec 10, 2025); Linda Sue Brown Allen's Motion to Intervene (filed Dec. 10, 2025); Coty Brown and Lindsey Brown's Motion to Intervene (filed Dec. 10, 2025).

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REQUEST 2

RESPONSIBLE PARTY: **Steve Shute**

Request 2. For each intervenor, state whether the intervenor's connections to Kentucky Frontier system were previously known to Kentucky Frontier and, if possible, provide an estimate of the monthly amount of free gas delivered to these individuals.

Response 2. For five of the intervenors, it's not clear on which address a claim is made, since they are not listed as owners of a known residence. Shortly after taking over BTU, Kentucky Frontier had a list of gas users along Fontaine Williams FWG, including a predecessor (father) to Linda Brown. Kentucky Frontier had limited or no knowledge of how they were connected, where they used gas (home, shop, etc.), and no record of gas usage, since none of these particular users were metered.

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REQUEST 3

RESPONSIBLE PARTY: **Steve Shute**

Request 3. Refer to Kentucky Frontier's responses to Commission Staff's First Request for Information (Staff's First Request).² State what actions Kentucky Frontier is required to perform in order to pressure test the remaining portions of the FWG pipeline discussed in its response to Staff's First Request and provide a timeline. The response should include the following:

- A. Any actions Kentucky Frontier intends to take to locate unknown connections;
- B. Explain if a pressure test is required to connect the new pipeline to TC energy tap;
- C. State whether the pressure test is going to be conducted with gas or air; and
- D. State what metric(s) are required to be achieved to meet or exceed the applicable pressure test standard.

Response 3. See response to Staff DR1-2. BTU Gas already incorporated the FWG line from Sublett to Puncheon Creek when Kentucky Frontier took over in 2012. As with all the BTU Gas system, Kentucky Frontier assumed that DOT regulations for design and testing

² Kentucky Frontier's Response to Commission Staff's First Request for Information (Staff's First Request) (filed Nov. 26, 2025).

and operation had been followed since BTU Gas was under the scrutiny of the Commission. The remainder of the FWG line was never operated as a DOT pipeline, and the southeast half was never tested or completed or pressurized.

With the current project, Kentucky Frontier plans to test and take over a section of the Fontaine Williams FWG 8-inch main. Under Federal gas pipeline safety regulations at 49 CFR Part 192 §513 test requirements for plastic pipelines, the line must be pressure tested to at least 150% of the maximum operating pressure. For this segment, MAOP will be 60 psi so test pressure must be at least 90 psi. DLR has already made a successful pressure test of the line from Triple S Road near David (just east of Long Creek) to TC Energy at Martin.

The segment of the FWG pipeline that Kentucky Frontier is proposing to take over operation and control of will be tested with air, so no gas users will be taking gas, which would appear as a leak. But all lines connected to the FWG main will be tested at the same time and must maintain test pressure.

Kentucky Frontier will attempt to identify and locate all gas users along FWG. Kentucky Frontier needs a clear picture of the details on all those connections and how to turn off or repair them if they leak. If a section cannot hold test pressure, Kentucky Frontier will use its standard procedures to find and resolve the issue, possibly including introduction of low-pressure, odorized gas that can be found with a gas detector and further sectioning the line if needed. Since gas service must be interrupted for this testing, any local users will have more incentive to cooperate with the identification of all users and connected lines in their nearby pipeline segment.

As gas users are identified, they will be given the opportunity to apply for gas service with Kentucky Frontier. No service will be provided without an application and security deposit. All users will get a meter and will be expected to pay the Kentucky Frontier tariff as any other utility customer.

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REQUEST 4

RESPONSIBLE PARTY: **Steve Shute**

Request 4. State whether DLR has a PHMSA Operator ID (OPID).

Response 4. DLR is OPID 31912.

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REQUEST 1

RESPONSIBLE PARTY: **Steve Shute**

Request 5. State whether the DLR line is considered a transmission line or a distribution line.

Response 5. The former Fontaine-Williams FWG line, whether operated by DLR or Kentucky Frontier, will be considered a distribution main, odorized and operated at up to 60 psi MAOP.

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REQUEST 6

RESPONSIBLE PARTY: **Steve Shute**

Request 6. State whether each intervenor or each customer in question are farm-tap customers or distribution customers. Provide customer classification by segment and line.

Response 6. Gas users are currently not considered “customers” of any entity. These gas users are taking gas with no meter. They do not pay bills or provide customer information. Kentucky Frontier plans to test and take over a section of the 8-inch main from FWG. As gas users are identified and apply for gas service with Kentucky Frontier, they will receive a meter and will be expected to pay the tariff as any other utility customer (not farm taps). All users along FWG are expected to be Residential class, with one church as a Commercial customer, paying the same rates as Residential.

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REQUEST 7

RESPONSIBLE PARTY: **Steve Shute**

Request 7. State which operator, Kentucky Frontier or DLR, is responsible for operating and maintaining the facilities serving these customers.

Response 7. The Puncheon-to-Long Creek segment, including these intervenors, will be owned and operated by Kentucky Frontier as part of the utility.

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REQUEST 8

RESPONSIBLE PARTY: **Steve Shute**

Request 8. State whether Kentucky Frontier will disconnect customers by shutting off individual meters or by pipeline valve isolation.

Response 8. This question is unclear. There are currently no known meters. Kentucky Frontier will start the testing process by isolating a pipeline segment and turning off all gas users at their risers to a house or other connection. If the main segment does not hold pressure, then Kentucky Frontier will search for leaks and other gas users or connected lines and segment the main until the gas loss is stopped.

After the testing is complete on a segment and a customer is set up with a meter and gas service with Kentucky Frontier, they would be turned off at the meter for a short-term disconnection or at the tap tee on the gas main for a long-term disconnect.

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REQUEST 9

RESPONSIBLE PARTY: **Steve Shute**

Request 9. State when service will be restored by Kentucky Frontier to customers, if Kentucky Frontier disconnects customers by shutting off individual meters or by pipeline valve isolation.

Response 9. See Responses 3 and 8. If the gas users cooperate and Kentucky Frontier can identify all gas users and connections, testing can progress quickly, likely in a few days. However, none of the people who have moved for intervention in this matter are "customers" of Kentucky Frontier as there are no meters installed.