

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION
CASE NO. 2025-00042

IN THE MATTER OF:

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

KATHY HOWARD'S RESPONSES TO FIRST REQUEST FOR INFORMATION

Comes now Kathy Howard for her Responses to First Request for Information states as follows:

1. Refer Response to Motion to Submit, 2 page 4, regarding the consideration received for the natural gas pipeline right-of-way and easement over Kathy Howard's property located at 12565 SE Licking River Road, Salyersville, Kentucky 41465 (Howard/Allen Property). Explain how the documents provided require Kentucky Frontier to provide free gas service to Kathy Howard at the Howard/Allen Property.

ANSWER: Free gas was the consideration for the original gas pipeline easement in the Right of Way Agreement to BTU Gas Company. Kentucky Frontier Gas, LLC acquired this gas pipeline and Right of Way at the bankruptcy sale of BTU Gas Company.

2. Response to Motion to Submit, 3 page 4, regarding the consideration for the natural gas pipeline easement and right-of-way over the Howard/Allen Property. State when Kentucky Frontier refused to pay the consideration for the natural gas pipeline easement and right-of-way over the Howard/Allen Property and the amount of consideration requested.

ANSWER: Free gas for 1 residence has been received free of charge. A second tap has not been utilized.

3. Refer to Response to Motion to Submit, 4 page 4, regarding Kathy Howard's request for the fair market value of her property before and after the construction of the natural gas pipeline over the Howard/Allen property by BTU Gas Company, Inc. State the fair market value of the Howard/Allen Property before and after the construction of the natural gas pipeline.

ANSWER: If free gas is no longer available then the measure of damages would be the difference in the fair market value of our property before and after the gas pipe line was constructed the property. No appraiser has valued the difference in the fair market value at this time.

4. Provide the dates for any communication with BTU Gas Company or Kentucky Frontier regarding free gas and explain the reason for the communication.

ANSWER: I have spoken to representatives of Kentucky Frontier Gas, LLC about the consideration promised of free gas for the pipeline right of way 3-4 times since I received the original Complaint. The purpose of my calls was to inform them that I was entitled to free gas under the gas pipeline easement and right of way agreement signed by Pauline Howard, my mother who was my predecessor in title.

5. Provide any additional documents filed in Case No. 2026-CI-00030.6 This data request is continuing and should be updated in a supplemental filing as additional information becomes available.

ANSWER: Please see attached Deeds and previous documents filed which are attached again.

/s/ John C. Collins

HON. JOHN C. COLLINS
ATTORNEY AT LAW
132 WEST MAPLE STREET
PO BOX 475
SALYERSVILLE, KY 41465

CERTIFICATE OF SERVICE

This is to certify that the foregoing has been mailed, postage prepaid, or electronically sent to the following on this the 25th day of March, 2026:

Hon. L. Allyson Honaker
Honaker Law Office
1795 Alysheba Way
Suite 1203
Lexington, Ky. 40509

Ms. Linda C. Bridwell, P.E.
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Ky. 40602

/s/ John C. Collins

HON. JOHN C. COLLINS

DEED

THIS DEED, by and between PAULINE HOWARD, widow, of 15274 S.E. Licking River Road, Salyersville, Kentucky 41465, Party of the First Part; and KATHY HOWARD of 15274 S.E. Licking River Road, Salyersville, Kentucky 41465, Party of the Second Part; (2012 TAX BILL C/O Kathy Howard, 15274 S.E. Licking River Road, Salyersville, KY 41465);

WITNESSETH: That said Party of the First Part for and in consideration of the love and affection she has for her daughter, Grantee, the receipt of which is hereby acknowledged, do hereby grant and convey to Party of the Second Part, her heirs and assigns, the following described property in Magoffin County, Kentucky, to-wit:

The following described tract or parcel of land, lying and being in Magoffin County, Kentucky, on the waters of Licking River, more particularly described as follows:

BEGINNING at a marked sycamore at Forrest Salyer's line; thence across the highway a north course with Lot No. 4 to Jane Salyer's line; thence with center of ridge to Malcolm Joseph's line (or Farish Wireman line); thence with said line to Dovie Miller's (or Joe Miller's line); thence running with same line to a marked hickory; thence a straight line down the point to a marked white oak; thence down the hill to a marked maple; thence a straight line across the highway to a marked rock; thence up the highway to an iron stake; thence a straight (sic) line across the highway to a marked sycamore; thence up the hill to a cherry tree; thence a straight line up the point to a marked poplar; thence a straight line up the point to Dud Carpenter's line; thence running with said line down the point across the highway and river and with same line up the hill to Glenn Salyer's line; thence with same line down the point to Forrest Salyer's line; thence with same line on down the point to the cemetery; thence around right side of cemetery to a marked corner post; thence on down the point to a marked

TIME 4:03 AM PM
RENE ARNETT SHERHERD, CLERK

MAY 01 2012

LOGGED FOR RECORD
MAGOFFIN COUNTY CLERK

dogwood; thence down the lane and across the river and up the approach to the highway; thence down the highway to a marked scycamore (sic) at the beginning.

(All mineral and mineral rights previously reserved).

EXCEPTIONS: There is excepted and excluded from the above described property the following tracts of property:

Tract No. 1:

Beginning at the highway at "Chandler Allen's" approach at a marked sycamore stump; thence running a southeasterly direction up the point with Forrest Salyers' line to the top of the knob to Dud Carpenter's line; thence down the point to Virgie Shepherd's line; thence down the hill with said line to the highway; thence down the highway to the beginning.

Being the same property conveyed from Sammy Howard and Pauline Howard, his wife, to Lewis Miller and Madelene Miller, his wife, by deed dated August 24, 1974, recorded in Deed Book 108, Page 239, of the Magoffin County Clerk's Office.

Tract No. 2:

The following described tract or parcel of land lying and being in Magoffin County, Kentucky, on the waters of Licking River, more particularly described as follows:

BEGINNING at the upper side of Highway Route 7 with an iron pipe, running a southeasterly course to a marked white oak; thence a straight line to another marked white oak; thence a straight line to another marked white oak, on up the hill to a marked maple, (the calls from the beginning to the maple, make an approximate straight line), thence on up the hill to the center of the point to Dud Carpenter's line; thence down the point with said line to the highway; thence down the highway to the beginning which is an iron pipe, 20 acres more or less.

The mineral rights have been excepted.

Being the same property conveyed by Sammy Howard and

Pauline Howard, his wife, to Virgil Shepherd and Brenda Shepherd, by deed dated January 15, 1974, recorded in Deed Book 106, Page 401, of the Magoffin County Clerk's Office.

Being the same property conveyed to Pauline Howard from Kathy Howard by deed dated April 12, 1991, recorded April 17, 1991, in Deed Book 141, Page 646, of the Magoffin County Clerk's Office.

Also, being the same property inherited by parties hereto as shown by Affidavit of Descent of Sammy Howard of record in Deed Book 141, Page 645, of the Magoffin county Clerk's Office.

To have and to hold the same, together with all the appurtenances thereunto belonging unto the Party of the Second Part, her heirs and assigns, with covenant of general warranty.

CERTIFICATION

We, PAULINE HOWARD, Grantor and KATHY HOWARD, Grantee, do hereby certify, pursuant to KRS Chapter 382, that the above property is transferred by gift and other consideration. We further certify that the full estimated fair cash value of the property herein conveyed is \$78,000.00, and we understand that falsification of the stated full estimated value is a Class D felony, subject to one to five years imprisonment and fines up to \$10,000.00.

IN TESTIMONY WHEREOF, witness our signatures this 26th day of April, 2012.

Grantor:
SIGNED: Pauline Howard
PAULINE HOWARD

Grantee:

SIGNED: Kathy Howard
KATHY HOWARD

STATE OF KENTUCKY:

COUNTY OF MAGOFFIN:

I, Jeresa Watson, a Notary Public for the County and State aforesaid, do certify that the foregoing was on the 26th day of April, 2012, produced to me in said County and acknowledged, delivered, subscribed and sworn to by PAULINE HOWARD, thereto to be her act and deed.

My Commission Expires 4/23/2015.

Jeresa Watson
NOTARY PUBLIC

STATE OF KENTUCKY:

COUNTY OF MAGOFFIN:

I, Jeresa Watson, a Notary Public for the County and State aforesaid, do certify that the foregoing was on the 26th day of April, 2012, produced to me in said County and acknowledged, delivered, subscribed and sworn to by KATHY HOWARD, thereto to be her act and deed.

My Commission Expires 4/23/2015.

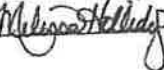
Jeresa Watson
NOTARY PUBLIC

NO TITLE EXAMINATION PERFORMED,
DESCRIPTION SUPPLIED BY THE GRANTOR
AND/OR GRANTEE AND READ AND
APPROVED BY GRANTOR AND/OR GRANTEE

THIS INSTRUMENT WAS PREPARED BY:

COLLINS & ALLEN
P. O. BOX 475
SALYERSVILLE, KENTUCKY 41465

BY: 
JOHN C. COLLINS

No Deed Tax Collected
Renee Arnett-Shepherd
By:  D.C.



383327
Lodged on: 5/1/2012 4:03:00 PM
Entered on: 5/2/2012 12:24:52 PM
Book: DEED Number: 283
Pages: 291 - 295
Renee Arnett-Shepherd, Magoffin County
DC: MELISSA HOLLIDAY