

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

LINDA SUE BROWN'S RESPONSES TO FIRST REQUEST FOR INFORMATION

Comes now Linda Sue Brown for her Responses to First Request for Information states as follows:

1. Refer to Linda Brown's Response to Motion to Submit, 2 page 4, regarding the consideration received for the natural gas pipeline right-of-way and easement over 59 Irvine Allen Cem., Salyersville, Kentucky 41465 (L. Brown Property). Explain how the documents provided require Kentucky Frontier to provide free gas service to the L. Brown 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. Refer to Joint Response to motion to submit, 3 page 4, regarding the consideration for the natural gas pipeline easement and right-of-way over the L. Brown Property. State when Kentucky Frontier refused to pay the consideration for the natural gas pipeline easement and right-of-way over the L. Brown 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 Joint Response to motion to submit, 4 page 4, regarding Linda Brown's request for the fair market value of the L. Brown Property before and after the construction of the

natural gas pipeline by BTU Gas Company, Inc. State the fair market value of the L. Brown Property before and after the construction of the natural gas pipeline and provide any evidence used to calculate or estimate the stated property value.

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 Irvine Allen and Ethel Allen, my parents who were my predecessors 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

Linda

D E E D

THIS DEED, by and between IRVIN ALLEN, single, of 3073 Long Creek Road, Salyersville, KY 41465; Party of the First Part and LINDA SUE BROWN, of 59 Irvine Allen Cemetery Road, Salyersville, KY 41465; (2019 TAX BILL C/O LINDA SUE BROWN, of 59 Irvine Allen Cemetery Road, Salyersville, KY 41465) Party of the Second Part;

WITNESSETH: That said Party of the First Part for and in consideration of the love and affection the grantor has for the grantee, his daughter, and by gift, does hereby grant and convey to Party of the Second Part, her heirs and assigns, the following described property in Magoffin County, Kentucky, to-wit:

A tract of land, lying and being in the County of Magoffin, State of Kentucky on Long Creek, a tributary of Licking River:

BEGINNING at a drain between Green Allen and Joseph Allen; thence with the drain to some marked trees to the top of the hill to John Wireman's line; with said line and middle of the ridge to Smith Whitaker's line to the corner to a marked tree; thence down the hill to the fence; thence with same to the creek; thence across the creek up the hill to a hickory; thence to a black oak; thence with some marked timber to the top of the point with the middle of the point to the top of the ridge with Simon Allen's line to S. B. Allen's line; thence with said line to Rosanna Stephens' line to green Allen's line; thence with said line to the beginning. Containing 150 acres more or less.

Being a portion of the same property conveyed to Irvin Allen, Jr., et al by Deed of record in Deed Book 170, page 342, in the Magoffin County Clerk's Office.

LODGED FOR RECORD
MAGOFFIN COUNTY CLERK

MAR 18 2019

TIME 1:51 PM

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, IRVIN ALLEN, Grantor(s) and LINDA SUE BROWN, Grantee(s), do hereby certify, pursuant to KRS Chapter 382, that the above described property was transferred by gift without consideration, and has a fair market value of \$ 8,000.00. We further certify that 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 21 day of December, 2018.

Grantors(s)

SIGNED:

Irvin Allen Jr
IRVIN ALLEN

Grantee(s)

SIGNED:

Linda S Brown
LINDA SUE BROWN

STATE OF Ky
COUNTY OF Morgan

I, Stella G. Huff, a Notary Public for the County

and State aforesaid, do certify that the foregoing was on the 21st day of December, 2018, produced to me in said County and acknowledged, delivered, subscribed and sworn to by

IRVIN ALLEN, thereto to be his act and deed.

My Commission Expires 12-22-2018

Sheela K. Jeff
NOTARY PUBLIC

STATE OF Kentucky :
COUNTY OF Magoffin :

I, Sandy Spurlack, a Notary Public for the County

and State aforesaid, do certify that the foregoing was on the 18 day of March, 2018,

produced to me in said County and acknowledged, delivered, subscribed and sworn to by

LINDA SUE BROWN, thereto to be her act and deed.

My Commission Expires 9-20-21

Sandy Spurlack
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

Gregory D. Allen
GREGORY D. ALLEN

ATTORNEY AT LAW
P. O. BOX 585
SALYERSVILLE, KENTUCKY 41465

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



371624
Lodged on: 3/18/2019 1:51:00 PM
Entered on: 3/19/2019 3:38:43 PM
Book: DEED Number: 228
Pages: 355 - 357
Renee Arnett-Shepherd, Magoffin County
DC: MELISSA WILLIAMS

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BTU GAS COMPANY
RIGHT OF WAY EASEMENT AGREEMENT

For and in consideration of one (1) residential free tap and gas (for a total of two (2) residential dwellings with gas; this includes the one residential dwelling from the lease) and other good and valuable consideration the receipt of which is hereby acknowledged, the undersigned, Irvin Allen Jr. and Ethel Allen, their successors, heirs, and assigns do hereby grant to BTU GAS COMPANY, INC. its licensees, successors, and assigns (hereinafter referred to as Grantee), a right of way and easement agreement to construct, operate, maintain, add/or remove such lines or related services as the Grantee may require from time to time consisting of

- A. Buried wires, markers, steel and plastic pipe upon, over and under a strip of land being a twenty (20) foot working right of way, being a ten (10) feet wide permanent easement with the right of ingress and egress across the following lands in Magoffin County, State of Kentucky, described as follows:

Deed Book 170 Page number 342-344 and to the fullest extent the undersigned has the power to grant, if at all, along and under the roads, streets, or highways adjoining or through said property.

The following rights are also granted: ingress and egress to said easement at all times to clear the easement and keep it cleared of all trees, undergrowth or other obstructions; to trim and cut and keep trimmed and cut all dead, weak, leaning or dangerous trees or limbs outside of the easement which might interfere with or fall upon the right of ways. And the right to relocate said facilities on said lands to conform to any future highway relocation, widening or improvements.

To have and to hold the above granted easement unto BTU GAS COMPANY, its successors and assigns forever and in perpetuity.

Grantor(s) warrant(s) that he/she/they/ are the true owner (s) of record of the above described land on which the aforesaid easement is granted.

In witness whereof, the undersigned has/have caused this instrument to be executed on the 12th day of September 2005.

Witness: Charles Brown Owner: Irvin Allen Jr
Witness: _____ Owner: Ethel Allen

STATE OF KENTUCKY
COUNTY OF MAGOFFIN

Personally came before me Irvin Allen Jr. and Ethel Allen to be the owner(s) who executed this instrument and acknowledged the same.

This 12 day of September, 2005

Jessica K Long
Notary Public

My commission expires: April 29, 2007

STATE OF KENTUCKY
MAGOFFIN COUNTY
I, Haden B. Arnett, Clerk of the County and State aforesaid certify that the foregoing RW was on the 5th day of May 2006 lodged for record, whereupon the same with the foregoing and this certificate have been duly recorded in my office.
Given under my hand, this 10th day of May 2006
at Book 186 Page 97 HADEN B. ARNETT Clerk
Time A.M. 3:45 P.M. By Jane Bily DC

This instrument prepared by:
Fam Williams