

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

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

CASE NO.
2025-00042

RESPONSE TO KY FRONTIER GAS, LLC'S MOTION FOR DECISION AND
INTERVENOR'S REQUEST FOR HEARING BEFORE THE PUBLIC SERVICE
COMMISSION

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Comes the Intervening parties, Coty Brown, Lindsey Brown, Linda Sue Brown, Ryan Allen, Kathy Howard, Ricky Carty and Chrystal Shawn Risner, by counsel and for their Response to Ky Frontier Gas, LLC's Motion for Declaratory Order on the issue of free gas provided as the sole consideration of a pipeline easement to carry gas over Intervenor's property states as follows:

In its Response to Ky Frontier Gas, LLC's previous Request to Submit this Case on the Record the Intervenor requested the opportunity to present evidence to support their claims, obviously this would require a hearing as the issues presented involve disputed facts, differing agreements and varying course of performance evidence.

This argument was previously advanced in Intervenor's Response to Ky Frontier Gas, LLC's Request to Submit on the record and obviously it was the Intervenor's request for a hearing, and not allow this case to be submitted on the record or for a Declaratory Judgment.

Further, the Intervenor now formally request a hearing on this matter so they can present their evidence concerning the consideration promised in writing to them in the pipeline easements and/or verbally promised as well as evidence of performance to date by all parties.

Respectfully submitted,

/s/ John C. Collins

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2026, the foregoing document was electronically filed with the Kentucky Public Service Commission using the KY eCourts eFiling system. A true and accurate copy of the foregoing document was served via email upon:

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