

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

ELECTRONIC APPLICATION OF KENUTCKY )	CASE NO.
FRONTIER GAS, LLC FOR AN ALTERNATIVE )	
RATE FILING PURUSANT TO 807 KAR 5:076 )	2025-00277
AND OTHER GENERAL RELIEF )	

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**MOTION FOR DEVIATION**

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Comes now Kentucky Frontier Gas, LLC (“Kentucky Frontier”) by and through the undersigned counsel, pursuant to 807 KAR 5:076, Section 17 and other applicable law, and respectfully requests the Kentucky Public Service Commission (“Commission”) grant a deviation from 807 KAR 5:076 Section 4(c) requiring Kentucky Frontier’s application include an amortization schedule for any outstanding bonds, promissory notes, and debt instruments. As grounds for its Motion for Deviation in the above-styled proceeding Kentucky Frontier respectfully states as follows:

1. On August 29, 2025, Kentucky Frontier filed an application for an alternative rate adjustment pursuant to 807 KAR 5:076. Pursuant to 807 KAR 5:076, Section 4(c), the application is required to contains amortization schedules for any outstanding debt.
2. Kentucky Frontier has included a copy of each of its debt instruments which have all been approved by the Commission.<sup>1</sup>

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<sup>1</sup> See, Case No. 2012-00099, *In the Matter of: The Application of Kentucky Frontier Gas LLC for Approval of Transfer of Assets of the Former B.T.U. Gas Company and Approval of Financing of Acquisition* (Ky. P.S.C., March 16, 2012); Case No. 2015-00299, *In the Matter of: Joint Application of Kentucky Frontier Gas, LLC and Public Gas Company for Approval of Transfer and Acquisition of Assets and Financing*, (Ky. P.S.C., Sept. 4, 2015); Case No. 2018-00010, *In the Matter of: The Application of Kentucky Frontier Gas, LLC for Approval of Financing*, (Ky. P.S.C., Jan. 26, 2018); Case No. 2019-00046, *In the Matter of: Application of Kentucky Frontier Gas, LLC for Approval of Financing*, (Ky. P.S.C., Feb. 19, 2019); Case No. 2019-00379, *In the Matter of: Application of Kentucky Frontier Gas, LLC for*

3. Kentucky Frontier reached out to the Small Business Administration regarding an amortization schedule for each of the loans. However, Kentucky Frontier was told they did not do amortization schedules for these loans. All documentation for these loans would have been provided in the cases approving the financing that are cited in footnote 1. Therefore, Kentucky Frontier is unable to provide amortization schedules as required by 807 KAR 5:076 Section 4(c).

4. In addition, Kentucky Frontier was not provided amortization schedules for the truck loans that are attached to the Application and therefore, is unable to provide amortization schedules. All information for these loans would have been provided in the financing cases for each of the loans which are cited in footnote 1.

WHEREFORE, based on the foregoing, Kentucky Frontier requests a deviation pursuant to 807 KAR 5:076(17) from the requirement to include amortization schedules of any outstanding debt.

Dated this the 29<sup>th</sup> day of August 2025.

Respectfully submitted,

  
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*Approval of Financing, (Ky. P.S.C. Oct. 14, 2019); Case No.2020-00400, In the Matter of: Electronic Application of Kentucky Frontier Gas, LLC for Approval of Financing, (Ky. P.S.C., Dec. 14, 2020); Case No. 2021-00466, In the Matter of: Electronic Application of Kentucky Frontier Gas, LLC for Approval of Financing, (Ky. P.S.C., Dec. 16, 2021).*

**CERTIFICATE OF SERVICE**

This is to certify that foregoing electronic filing was transmitted to the Commission on August 29, 2025; 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.



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*Counsel for Kentucky Frontier Gas, LLC*