

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

In The Matter Of:

ELECTRONIC INVESTIGATION INTO THE RATES AND SERVICES OF EAST KENTUCKY MIDSTREAM, LLC	)	CASE NO.
	)	2026-00121

**KENTUCKY FRONTIER GAS, LLC’S
MOTION TO INTERVENE**

Comes Kentucky Frontier Gas, LLC’s (“Kentucky Frontier”), by and through counsel, pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and other relevant authority, and hereby moves the Kentucky Public Service Commission (“Commission”) for an order granting it full intervenor status in this proceeding. In support of this motion Kentucky Frontier states as follows:

1. The Commission’s regulations, at 807 KAR 5:001, Section 4(11)(a)(1), require that a person requesting leave to intervene as a party to a Commission case, must by timely motion, state his or her interest in the case and how intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

2. The Commission’s regulations, at 807 KAR 5:001, Section 4(11)(b), provide that the Commission shall grant leave to intervene if it finds that the movant has made a timely motion for intervention, and has a special interest in the case that is not otherwise adequately represented or that the intervention is likely to present issues or develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

3. Pursuant to 807 KAR 5:001, Section 4(11)(a), Kentucky Frontier's mailing address is 2963 Kentucky Route 321 North, Prestonsburg, KY 41653 and Kentucky Frontier's may be emailed at:

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4. Should intervention be granted, pursuant to 807 KAR 5:001, Section 8(d), Kentucky Frontier waives any right to service of Commission Orders by U.S. mail, and states it possesses the facilities to receive electronic submissions, and copies of all pleadings, requests, orders, notices, and other documents in this case should be electronically sent to the electronic mailing addresses listed above.

5. East Kentucky Midstream's rates and services being investigated in this case will directly impact Kentucky Frontier and its customers, as approximately one-third of Kentucky Frontier customers and gas supply are solely supplied by East Kentucky Midstream. Any rate increase to Kentucky Frontier proposed by East Kentucky Midstream in this proceeding will be passed on to the customers of Kentucky Frontier.

6. Kentucky Frontier was unable to file its motion to intervene by July 17, 2026 in accordance with the Commission's July 14, 2026 procedural schedule. Ordering paragraph 3

of the Commission's July 14, 2026 Order initiating this proceeding, three days before the intervention deadline, provides that the Executive Director shall mail a copy of the Order to Kentucky Frontier Gas Company [sic] but, Kentucky Frontier was not served with the Order and therefore did not have notice of this proceeding nor could it file for intervention within the three day timeframe. As soon as Kentucky Frontier obtained knowledge of this proceeding, it moved to intervene.

7. Kentucky Frontier plans to abide by the existing procedural schedule and, if granted intervention, does not intend to request an extension and therefore, Kentucky Frontier's intervention will not prejudice any of the existing parties.

8. Kentucky Frontier has a special interest in this case as described above because Frontier customers are the most affected by the issues for decision in this case. Kentucky Frontier's interest cannot and will not be adequately represented by any existing party. Kentucky Frontier's interest principally resides in its status as a customer of East Kentucky Midstream as East Kentucky Midstream holds a monopoly over the supply of natural gas to Kentucky Frontier's customers taking off of the old Public Gas system.

9. Kentucky Frontier's intervention would not unduly complicate or disrupt the proceedings. To the contrary, Kentucky Frontier's intervention is likely to present issues or develop facts that will assist the Commission in fully considering vital case issues.

WHEREFORE, Kentucky Frontier respectfully requests that it be granted full intervenor status in this proceeding.

This 21st day of August 2026.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing is being electronically transmitted to the Commission on August 21, 2026; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020- 00085, no hard copies of this filing will be made.



Counsel for Kentucky Frontier Gas, LLC