

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| ELECTRONIC APPLICATION OF KENTUCKY |) | CASE NO. |
| FRONTIER GAS, LLC FOR APPROVAL OF |) | 2020-00241 |
| TRANSFER OF OWNERSHIP INTERESTS |) | |

COMMISSION STAFF'S FIRST REQUEST FOR
INFORMATION TO KENTUCKY FRONTIER GAS, LLC

Kentucky Frontier Gas, LLC (Kentucky Frontier), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on within ten days of the date of entry of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, Kentucky Frontier SHALL NOT FILE the original paper copy of all requested information at this time, but rather shall file original paper copies within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Frontier shall make timely amendment to any prior response if Kentucky Frontier obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky Frontier fails or refuses to furnish all or part of the requested information, Kentucky Frontier shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Kentucky Frontier shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify the state in which IGS, Inc. is incorporated and the date of its incorporation. Also, state whether IGS, Inc. is in good standing in the state in which it is incorporated, and whether it is authorized to transact business in Kentucky.
2. Provide a copy of the articles of organization for Kentucky Frontier.
3. State whether Steven Shute's current interest in Kentucky Frontier constitutes a controlling interest in the limited liability company or whether the articles of

organization currently allow IGS, Inc. or Robert Oxford (or both) to control Kentucky Frontier despite holding a minority interest, and explain each basis for the response.

4. State whether IGS, Inc. currently plays any role in the management or operations of Kentucky Frontier, and if so, describe IGS, Inc.'s role in the management or operation of Kentucky Frontier, and explain whether and how that role will change after it transfers its interest in Kentucky Frontier as proposed herein.

5. State whether Robert Oxford currently plays any role in the management or operations of Kentucky Frontier, and if so, describe Mr. Oxford's role in the management or operation of Kentucky Frontier, and explain whether and how that role will change after he transfers his interest in Kentucky Frontier as proposed herein.

6. If either IGS, Inc. or Robert Oxford currently play a role in the management or operation of Kentucky Frontier and will not continue to act in that role, in whole or in part, after they transfer their interest in Kentucky Frontier, explain how Kentucky Frontier will fill their role.

7. State whether Kentucky Frontier has any loans or lines of credit guaranteed by Robert Oxford or IGS, Inc., and if so, explain whether Robert Oxford or IGS, Inc. will continue to act as guarantor on any of Kentucky Frontier's indebtedness or lines of credit.

8. Identify the lender, the interest rate, and the current balance of any debt currently owed by Kentucky Frontier on which Robert Oxford or IGS, Inc. are guarantors, and provide the current term and payment schedule for any such debt, including any balloon payments.

9. State whether the proposed transfers of Robert Oxford and IGS, Inc.'s interest in Kentucky Frontier will result in a default on any note, credit agreement, or other

evidence of indebtedness on which Kentucky Frontier continues to have repayment obligations.

10. State whether the proposed transfers of Robert Oxford and IGS, Inc.'s interest in Kentucky Frontier, or the fact that they will no longer act as guarantor, if applicable, will effect Kentucky Frontier's ability to obtain the credit necessary to continue operations, and explain each basis for the response.

11. Explain each basis for Kentucky Frontier's contention that Steve Shute has the financial, technical, and managerial abilities necessary to provide reasonable service to Kentucky Frontier's customers without the involvement of IGS, Inc. and Robert Oxford.



Kent A. Chandler
Acting Executive Director
Public Service Commission
P.O. Box 615
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DATED SEP 03 2020

cc: Parties of Record

Case No. 2020-00241

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