

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NAVITAS KY)	CASE NO.
NG, LLC FOR AN ALTERNATE RATE)	2019-00430
ADJUSTMENT)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO NAVITAS KY NG, LLC

Navitas KY NG, LLC (Navitas KY), 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 April 10, 2020. Pursuant to the Commission's Order in Case No. 2020-00085, issued March 16, 2020, Navitas KY WILL NOT FILE the original paper copy of all requested information at this time, but rather will 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 that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Navitas KY shall make timely amendment to any prior response if it 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 Navitas KY fails or refuses to furnish all or part of the requested information, Navitas KY 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, Navitas KY shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the February 6, 2020 public comment filed by B & W Pipeline (B & W's February 6, 2020 Public Comment) regarding B & W's calculation of the Federal Energy Regulatory Commission (FERC) approved rates for July 2017.

- a. Provide a copy of Navitas KY's most recent leak survey.
- b. Provide Navitas KY's Lost and Accounted for Gas (LAUG).
- c. Provide Navitas TN NG, LLC's (Navitas TN) LAUG.
- d. Provide an explanation for the difference between the amount of gas

B & W delivered to Navitas KY as shown in B & W's February 6, 2020 Public Comment and Navitas KY's reported sales volume.

2. Refer to B & W's February 6, 2020 Public Comment, which states that the calculation of the amount of gas transported by B & W should be based upon the amount of gas that B & W delivered to Navitas KY and not on the amount of gas sold by Navitas KY.

a. State whether Navitas KY agrees with the delivered transportation volumes provided by B & W in the public comment, and, if not, explain why.

b. If Navitas KY agrees that the volumes provided by B & W are correct, explain why Navitas KY calculates amounts owed to B & W using sales metered by Navitas KY customer meters instead of the sales volumes delivered for Navitas KY's customers' use.

3. Refer to B & W's February 6, 2020 Public Comment, which states that Navitas KY allocated the cost for Tennessee's Public Utility Commission's (Tennessee PUC) approved flat monthly charge between Navitas KY and Navitas TN based on gas sold and not on gas delivered. Provide Navitas KY's position regarding B & W's argument that the Tennessee PUC-approved flat monthly charge should be allocation based on gas delivered as opposed to gas sold.

4. Refer to Navitas KY's Supplemental Filing, Exhibit G. Explain why Navitas KY believes it should be credited for Tennessee PUC-approved rate amounts never billed by B & W and never paid by Navitas KY.

5. Refer to Navitas KY's Supplemental Filing, Exhibit G, row labeled "FERC Tariff \$/MCF." Also, refer to Navitas KY's application, numbered paragraph 16. Reconcile the 2.7271 and 2.7172, referenced respectively.

6. Describe Navitas KY's attempts to negotiate the amount owed to B & W, and state whether Navitas KY has attempted to negotiate a lower transportation rate going forward.

7. Provide Navitas KY's understanding of the interruptible nature of the B & W Conditions of Service and state whether Navitas KY believes that its system supply is subject to interruption.



Kent A. Chandler
Executive Director
Public Service Commission
P.O. Box 615
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DATED MAR 25 2020

cc: Parties of Record

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