

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 THIRD 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 within 15 days of the date of this request. Pursuant to the Commission's Orders in Case No. 2020-00085,<sup>1</sup> issued March 16, 2020, and March 24, 2020, Navitas KY 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

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<sup>1</sup> 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.

Navitas KY shall make timely amendment to any prior response if Navitas KY 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 Navitas KY's response the Commission Staff's Second Request for Information (Staff's Second Request), item 7. Provide an electronic version of the revised Exhibit G in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

2. Refer to the February 7, 2020 public comment filed by B & W Pipeline (B & W), Exhibit A. Provide all bills or other forms of communication that Navitas KY received from B & W that confirm the amount of the adjusted bill as calculated and shown by B & W in Exhibit A. Any copies of bills provided should should reflect the bill as originally received by Navitas KY.

a. Refer to the February 7, 2020 public comment filed by B & W, Exhibit A, column B titled KY MCFs, and to Navitas KY's response to Staff's Second Request, item 2(b).

b. State whether Navitas KY agrees that the KY MCFs volumes shown in Exhibit A are correct and are the same as volumes delivered and billed by B & W.

c. State whether Navitas alleges that the metered volumes of gas delivered by B & W at the Albany City Gate are incorrect. If so, provide a detailed explanation of Navitas KY's concerns regarding the B & W meter and what actions Navitas KY has taken with B & W to address its concerns.

3. State whether Navitas KY is receiving and paying bills from B & W for gas delivered at the Albany City Gate beginning in February 2019 to the present date.

a. Provide copies of the bills. Any copies of bills provided should reflect the bill as originally received by Navitas KY.

b. Confirm that the billings are based on the meter readings conducted by B & W.



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Kent A. Chandler  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED APR 28 2020

cc: Parties of Record

Case No. 2019-00430

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