



Andy Beshear
Governor

Rebecca W. Goodman
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Michael J. Schmitt
Chairman

Robert Cicero
Vice Chairman

Talina R. Mathews
Commissioner

01/23/2020

Parties of Record

Re: Case No. 2020-00012

The attached electronic mail has been filed in the record of the above-referenced case. If you have any comments you would like to make regarding the contents of the electronic mail, please do so within five days of receipt of this letter.

If you have any questions, please contact Andrew Bowker, Staff Attorney, at 502-782-2580.

Sincerely,

A handwritten signature in blue ink that reads "Gwen R. Pinson".

Gwen R. Pinson
Executive Director

AB

Attachment

From: Thomas Hartline
To: Bowker, Andrew (PSC); klint.alexander [REDACTED]; Joseph Irwin
Cc: Vinsel, Nancy (PSC)
Subject: RE: Responses to Request for Information-PSC Case Number 2020-00012
Date: Tuesday, January 21, 2020 12:20:35 PM
Attachments: Requested data file.msg

Attached is the response I sent on the 10th.
We also mailed in requisite hard copies as requested.

Thomas Hartline
Navitas Utility Corporation
3186D Airway Avenue
Costa Mesa, CA 92626
[REDACTED]

From: Bowker, Andrew (PSC) <andrew.bowker@ky.gov>
Sent: Tuesday, January 21, 2020 8:29 AM
To: klint.alexander [REDACTED]; Joseph Irwin <[REDACTED]>; Thomas Hartline
[REDACTED]
Cc: Vinsel, Nancy (PSC) <Nancy.Vinsel@ky.gov>
Subject: Responses to Request for Information-PSC Case Number 2020-00012

Mr. Alexander,
In PSC Case Number 2020-00012 Commission Staff filed its First Request for Information on January 10, 2020. https://psc.ky.gov/PSCSCF/2020%20Cases/2020-00012/20200110_DATA_REQUEST.pdf
The data request responses were due on January 17, 2020. Please advise as to when the data responses will be filed with the Commission.

Thank you,
Andrew Bowker
Staff Attorney
Kentucky Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602
Direct: (502) 782-2580

From: [Vinsel, Nancy \(PSC\)](#)
To: [Thomas Hartline](#)
Cc: [Bowker, Andrew \(PSC\)](#); [Jankowski, Sarah \(PSC\)](#)
Subject: RE: Requested data file
Date: Tuesday, January 21, 2020 12:32:00 PM

Mr. Hartline,

The PSC Electronic Filings Mailbox is not monitored and thus filings cannot be made via email. The only purpose for this mailbox is that it is the mailbox from which orders are issued. If you want to file case documents electronically, then the case must be established as an electronic case.

Case No. 2020-00012 is not an electronic case, so only paper filings can be accepted. You can (and should) email the documents to Sarah Jankowski, who is on this email.

In the future, you can file GCAs as electronic cases, which addresses the issues.

Regards,
Nancy

Nancy J. Vinsel
Assistant General Counsel
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602-0615
Office: (502) 782-2582
Email: nancy.vinsel@ky.gov
Website: <http://psc.ky.gov>

From: Thomas Hartline <thartline@navitasutility.com>
Sent: Friday, January 10, 2020 11:30 AM
To: PSC - Electronic Filings Mailbox <pscfilings@ky.gov>
Cc: Thomas Hartline <thartline@navitasutility.com>
Subject: Requested data file

Attached is the requested data file.

Thomas Hartline
Navitas Utility Corporation
3186D Airway Avenue
Costa Mesa, CA 92626
714.242.4064

From: [Vinsel, Nancy \(PSC\)](#)
To: [Thomas Hartline; bbott@navitasutility.com; Klint Alexander](#)
Cc: [Jankowski, Sarah \(PSC\); Bowker, Andrew \(PSC\)](#)
Bcc: [Pinney, Jeb E \(PSC\); Bruner, Brandon S \(PSC\); Hinton, Daniel E \(PSC\)](#)
Subject: Kentucky PSC - Establishing future GCAs as electronic cases
Date: Tuesday, January 21, 2020 2:16:00 PM
Attachments: [Notice of Electronic Filing_RE.pdf](#)
[Electronic Filing Regulation.pdf](#)

Mr. Hartline, Ms. Bott, and Mr. Alexander,

To help you in filing future GCA adjustments as electronic cases with the Kentucky Public Service Commission, I am providing information about the regulations and procedures for electronic filing, and a copy of the notice of intent to use electronic filing form, which is also available on the Kentucky PSC website under "Utility Information" → to "Utility Forms" → Notice of Election to Use Electronic Filing Procedures. Here is a link to the form, which is also attached to this email:

https://psc.ky.gov/agencies/psc/forms/other/Notice%20of%20Electronic%20Filing_RE.pdf

I attached a copy of 807 KAR 5:001, Section 8, the Commission regulation for Electronic Filing Procedures. A notice of intent to use electronic filing form must be filed at least 7 days before submitted your GCA filing. The regulation walks filers through the filing procedures, which include the requirement to file one paper copy within two business days of the electronic filing. When filing the paper copy, the filer must include a copy of notification from the Commission confirming receipt of the electronic submission.

As noted in a previous email, the PSC Filings Mailbox does not accept emailed filings. Similarly, the electronic tariff filing system is available for filing tariffs, but not for filing case documents, such as responses to data requests filed as Excel spreadsheets. If an electronic case is established, then documents in word, PDF, and Excel format can be uploaded directly into the case file.

If you have any questions about electronic filing, you can call the Commission at 502-564-3940 and ask for the Filings Branch.

Regards, Nancy

Nancy J. Vinsel
Assistant General Counsel
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602-0615
Office: (502) 782-2582
Email: nancy.vinsel@ky.gov
Website: <http://psc.ky.gov>

NOTICE OF ELECTION OF USE OF ELECTRONIC FILING PROCEDURES

(Complete All Shaded Areas and Check Applicable Boxes)

In accordance with 807 KAR 5:001, Section 8, _____ gives notice of its intent to file an application for _____ with the Public Service Commission no later than _____ and to use the electronic filing procedures set forth in that regulation.

_____ further states that:

- | | Yes | No |
|--|--------------------------|--------------------------|
| 1. It requests that the Public Service Commission assign a case number to the intended application and advise it of that number as soon as possible; | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. It or its authorized representatives have registered with the Public Service Commission and are authorized to make electronic filings with the Public Service Commission; | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Neither it nor its authorized representatives have registered with the Public Service Commission for authorization to make electronic filings but will do so no later than seven days before the date of its filing of its application for rate adjustment; | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. It or its authorized agents possess the facilities to receive electronic transmissions; | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. The following persons are authorized to make filings on its behalf and to receive electronic service of Public Service Commission orders and any pleadings filed by any party or the Public Service Commission Staff: | | |

Name	Electronic Mail Address

6. It and its authorized representatives listed above have read and understand the procedures for electronic filing set forth in 807 KAR 5:001 and will fully comply with those procedures unless the Public Service Commission directs otherwise.

Signed _____

Name: _____

Title: _____

Address: _____

Telephone Number: _____

807 KAR 5:001, Section 8. Electronic Filing

Section 8. Electronic Filing Procedures.

(1) Upon an applicant's timely election of the use of electronic filing procedures or upon order of the commission in a case that the commission has initiated on its own motion, the procedures established in this section shall be used in lieu of other filing procedures established in this administrative regulation.

(2) At least seven (7) days prior to the submission of its application, an applicant shall:

(a) File with the commission written notice of its election to use electronic filing procedures using the Notice of Election of Use of Electronic Filing Procedures form; and

(b) If the applicant does not have an account for electronic filing with the commission, register for an account at <http://psc.ky.gov/Account/Register>.

(3) All papers shall be filed with the commission by uploading an electronic version using the commission's E-Filing System at <http://psc.ky.gov>. In addition, the filing party shall file one (1) copy in paper medium with the commission as required by subsection (12)(a)2. of this section.

(4)(a) Audio or video files.

1. A file containing audio material shall be submitted in MP3 format.

2. A file containing video material shall be submitted in MPEG-4 format.

(b) Except as established in paragraph (a) of this subsection, each file in an electronic submission shall be:

1. In portable document format;

2. Search-capable;

3. Optimized for viewing over the Internet;

4. Bookmarked to distinguish sections of the paper, except that documents filed in response to requests for information need not be individually bookmarked; and

5. If scanned material, scanned at a resolution of 300 dots per inch.

(c) If, pursuant to Section 4(12) of this administrative regulation, a party is requested to provide information in the form of an electronic spreadsheet, the file containing the spreadsheet shall be submitted in an Excel spreadsheet format.

(5)(a) Each electronic submission shall include an introductory file in portable document format that is named "Read1st" and that contains:

1. A general description of the filing;

2. A list of all material to be filed in paper or physical medium but not included in the electronic submission; and

3. A statement that the materials in the electronic submission are a true representation of the materials in paper medium.

(b) The "Read1st" file and any other material that normally contains a signature shall contain a signature in the electronically submitted document.

(c) The electronic version of the cover letter accompanying the paper medium filing may be substituted for a general description.

(6)(a) An uploading session shall not exceed twenty (20) files or 100 megabytes.
(b) An individual file shall not exceed thirty (30) megabytes.
(c) If a submission exceeds the limitations established in paragraph (a) of this subsection, the filer shall make electronic submission in two (2) or more consecutive uploading sessions.

(7) If filing a paper with the commission, the filing party shall certify that:
(a) The electronic version of the paper is a true and accurate copy of each paper filed in paper medium;
(b) The electronic version of the paper has been submitted to the commission; and
(c) A copy of the paper in paper medium has been mailed to all parties that the commission has excused from electronic filing procedures.

(8)(a) Upon completion of an uploading session, the commission shall notify all parties of record by electronic mail that an electronic submission has been made.
(b) Upon a party's receipt of this notification, each party shall be solely responsible for accessing the commission's Web site at <http://psc.ky.gov> to view or download the submission.

(9) Unless a party objects to the use of electronic filing procedures in the party's motion for intervention, the party shall:
(a) Be deemed to have consented to the use of electronic filing procedures and the service of all papers, including orders of the commission, by electronic means; and
(b) File with the commission within seven (7) days of the date of an order of the commission granting the party's intervention a written statement that the party, or the party's authorized agent, possesses the facilities to receive electronic transmissions.

(10) In cases in which the commission has ordered the use of electronic filing procedures on its own motion, unless a party files with the commission an objection to the use of electronic filing procedures within seven (7) days of issuance of the order directing the use of electronic filing procedures, the party shall:
(a) Be deemed to have consented to the use of electronic filing procedures and the service of all papers, including orders of the commission, by electronic means; and
(b) File with the commission within seven (7) days of the date of an order directing the use of electronic filing procedures a written statement that the party, or the party's authorized agent, possesses the facilities to receive electronic transmissions.

(11) If a party objects to the use of electronic filing procedures and good cause exists to excuse the party from the use of electronic filing procedures, service of papers on and by it shall be made by mailing a copy by United States mail or other recognized mail carrier to the attorney or party at the last known address.

(12)(a) A paper shall be considered timely filed with the commission if:
1. It has been successfully transmitted in electronic medium to the commission within the time allowed for filing and meets all other requirements established in this administrative regulation and any order of the commission; and
2. The paper, in paper medium, is filed at the commission's offices no later than the second business day following the successful electronic transmission.

(b) Each party shall attach to the top of the paper medium submission a copy in paper medium of the electronic notification from the commission confirming receipt of its electronic sub-mission.

(13) Except as established in this section, a party making a filing in accordance with the procedures established in this section shall not be required to comply with Section 4(8) of this administrative regulation.

Quarterly Report
 Gas cost recovery rate calculation

Navitas KY NG, LLC

Period	Filing date (on or about)	Reporting Months	Effective date (& 1st forecast month)
	31-Mar	November December January	1-May
	30-Jun	February March April	1-Aug
	30-Sep	May June July	1-Nov
X	31-Dec	August September October	1-Feb

Schedule I
Gas Cost Recovery Rate Summary

Navitas KY NG, LLC

Component	
Expected Gas Cost (EGC)	7.0000
+ Refund Adjustment (RA)	-
+ Actual Adjustment (AA)	1.7304
+ Balance Adjustment(BA)	0.0089
= Gas Cost Recovery Rate	\$ 8.7393

A. Expected Gas Cost Calculation

Total EGC	\$ 688,963.17
/ Twelve months sales	98,423
EGC	\$ 7.0000

B. Refund Adjustment Calculation

Refund Adjustment for reporting period	-
+ Previous quarter RA	-
+ Second previous quarter RA	-
+ Third previous quarter RA	-
+ Other cost adjustments	
= Refund Adjustment	\$ -

C. Actual Adjustment Calculation

Actual Adjustment for reporting period	0.8247
+ Previous quarter AA	(0.3995)
+ Second previous quarter AA	0.3828
+ Third previous quarter AA	0.9224
+ Other cost adjustments	
= Actual Adjustment	\$ 1.7304

D. Balance Adjustment Calculation

Balance Adjustment for reporting period	0.0057
+ Previous quarter BA	0.0477
+ Second previous quarter BA	(0.0149)
+ Third previous quarter BA	(0.0296)
= Balance Adjustment	\$ 0.0089

Schedule II
Expected Gas Cost

Navitas KY NG, LLC

Supplier or NYMEX	Twelve months 2018 - 2019	Known prior years average sales in MCF	MCF/MMBtu (from supplier)	Prior year purchases in MMBtu	Forecasted price per MMBtu	Converted price per MCF	Subtotal forecasted purchases
Petrol	January	10446	1.0660	11,135	5.42	5.77	60,301.23
Petrol	February	11084	1.0670	11,827	5.42	5.78	64,045.44
Petrol	March	11282	1.0710	12,083	5.42	5.80	65,436.23
Petrol	April	9205	1.0650	9,803	5.42	5.77	53,088.64
Petrol	May	6926	1.0660	7,383	5.42	5.77	39,979.92
Petrol	June	5578	1.0630	5,929	5.42	5.76	32,107.61
Petrol	July	5064	1.0650	5,393	5.42	5.77	29,207.05
Petrol	August	5675	1.0660	6,049	5.42	5.77	32,758.18
Petrol	September	5643	1.0670	6,021	5.42	5.78	32,607.24
Petrol	October	6536	1.0680	6,981	5.42	5.78	37,803.14
Petrol	November	10361	1.0660	11,045	5.42	5.77	59,811.24
Petrol	December	10624	1.0640	11,304	5.42	5.76	61,213.44
		98,423		104,953			568,359.35

Transportation	Twelve months 2018 - 2019	Spectra (East TN) demand	B&W pipeline	B&W flow	Subtotal forecasted	Total forecasted cost
	January	1,500.00		14,797.33	16,147.33	76,448.56
	February	1,500.00		16,531.44	17,881.44	81,926.89
	March	1,500.00		17,070.54	18,420.54	83,856.76
	April	1,500.00		11,425.88	12,775.88	65,864.52
	May	1,500.00		5,232.24	6,582.24	46,562.16
	June	1,500.00		1,569.45	2,919.45	35,027.06
	July	1,500.00		174.44	1,524.44	30,731.50
	August	1,500.00		1,833.02	3,183.02	35,941.20
	September	1,500.00		1,747.59	3,097.59	35,704.84
	October	1,500.00		4,174.33	5,524.33	43,327.46
	November	1,500.00		14,566.69	15,916.69	75,727.93
	December	1,500.00		15,280.85	16,630.85	77,844.29
					120,603.82	688,963.17

divide by sales	98,423
per MCF	\$ 7.0000
multiply by allowed purchases (sales / 1)	98,423
Expected Gas Cost	\$ 688,963.17

Schedule IV
Actual Adjustment

Navitas KY NG, LLC

	Third previous quarter			Second previous quarter			Previous quarter			Current quarter		
	Nov-18	Actual Dec-18	Jan-19	Feb-19	Actual Mar-19	Apr-19	May-19	Actual Jun-19	Jul-19	Aug-19	Actual Sep-19	Oct-19
Invoices												
Supply												
Petrol & FWM (B&W)	88,667.18	133,392.52	109,754.77	78,824.26	65,804.96	46,009.23	35,879.39	28,667.12	32,108.34	26,187.64	32,968.29	56,415.75
Transportation												
Spectra	1,644.19	1,641.37	1,648.12	1,474.72	1,468.27	1,531.24	1,649.73	1,618.84	1,058.84	1,647.49	1,130.68	1,485.83
B&W	13,562.15	13,656.06	13,637.70	39,834.15	34,733.97	25,275.39	12,571.57	8,248.47	10,705.54	10,690.67	19,708.59	34,276.30
Total cost	103,873.52	148,689.95	125,040.59	120,133.14	102,007.20	72,815.86	50,100.69	38,534.42	43,872.72	38,525.80	53,807.56	92,177.87
Sales in MCF	13,376	13,910	12,228	14,660	12,783	9,302	9,488	6,501	6,289	6,925	4,629	5,670
Cost per MCF	7.7659	10.6894	10.2258	8.1946	7.9799	7.8280	5.2804	5.9275	6.9761	5.5633	11.6240	16.2571
less ECG in effect	6.8630	6.8630	6.8630	6.8250	6.8250	6.8250	7.7163	7.7163	7.7163	6.0000	6.0000	6.0000
Delta	0.90	3.83	3.36	1.37	1.15	1.00	(2.44)	(1.79)	(0.74)	(0.44)	5.62	10.26
Monthly cost difference	12,076.78	53,225.62	41,119.82	20,078.64	14,763.22	9,329.71	(23,111.56)	(11,629.24)	(4,655.09)	(3,024.20)	26,033.56	58,157.87
			106,422.23			44,171.57		(39,395.90)				81,167.24
			115,380			115,380		98,615				98,423
	Actual Adjustment		0.9224	Actual Adjustment		0.3828	Actual Adjustment	(0.3995)	Actual Adjustment		0.8247	
Allocation												
Total B&W line sales	13,707	14,156	12,461	16,501	14,529	10,112	9,600	6,671	6,368	7,024	4,739	6,208
KY%	98%	98%	98%	89%	88%	92%	99%	97%	99%	99%	98%	91%
Byrdstown/Fentress (TN)	3,309	2,461	2,331	18,414	17,463	8,101	1,115	1,700	785	991	1,103	5,377
Cost												
Petrol	67,080.09	103,945.82	79,876.71	63,312.80	52,742.40	25,548.12	15,100.63	9,725.88	16,337.40	\$ 12,079.20	\$ 23,805.98	\$ 43,246.49
Allocation	65,460.65	102,138.75	78,382.52	56,247.69	46,403.21	23,501.41	14,925.23	9,478.03	16,135.99	11,908.78	23,251.93	39,500.56
Enbridge (Old spectra)												
250	1,684.87	1,670.41	1,679.54	1,659.96	1,668.85	1,664.59	1,669.12	1,661.17	1,072.06	\$ 1,671.07	\$ 1,157.62	\$ 1,626.73
Allocation	1,644.19	1,641.37	1,648.12	1,474.72	1,468.27	1,531.24	1,649.73	1,618.84	1,058.84	1,647.49	1,130.68	1,485.83
Cost												
B&W Transport	13,897.67	13,897.67	13,897.67									
Petrol volume							3,382.00	2,219.00	2,880.00	2,876.00	5,302.00	9,221.00
Flow charge (FERC juris)				39,834.15	34,733.97	25,275.39	9,189.57	6,029.47	7,825.54	\$ 7,814.67	\$ 14,406.59	\$ 25,055.30
Allocation	13,562.15	13,656.06	13,637.70	39,834.15	34,733.97	25,275.39	12,571.57	8,248.47	10,705.54	10,690.67	19,708.59	34,276.30
Sparta (FWM) Supply	23,780.63	31,806.72	31,970.29	25,412.35	22,052.25	24,468.00	21,200.40	19,690.88	16,171.72	\$ 14,483.20	\$ 9,947.88	\$ 18,519.30
Cost	23,206.52	31,253.77	31,372.25	22,576.57	19,401.75	22,507.82	20,954.15	19,189.09	15,972.35	14,278.86	9,716.36	16,915.19
Allocation												

Schedule V
Balance Adjustment

Navitas KY NG, LLC

	(61,087.10)	(59,498.91)	(66,151.67)	(61,377.08)	(53,490.77)	(29,949.49)	(20,819.99)	(13,064.82)	98,765.13	96,565.82	95,064.63	137,792.35	129,207.25	123,561.22	116,784.10
+ under charged															
- over charged															
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	->Actual Oct-19
Sales in MCF	6,855	6,083	7,301	13,376	13,910	12,228	14,660	12,783	9,302	9,488	6,501	6,289	6,925	4,629	5,670
Summary															
3rd Previous Qtr BA	(0.0639)	(0.0639)	(0.0639)	0.0052	0.0052	0.0052	(0.0003)	(0.0003)	(0.0003)	(0.0085)	(0.0085)	(0.0085)	0.0178	0.0178	0.0178
2rd Previous Qtr BA	0.0052	0.0052	0.0052	(0.0003)	(0.0003)	(0.0003)	(0.0085)	(0.0085)	(0.0085)	0.0178	0.0178	0.0178	(0.0836)	(0.0836)	(0.0836)
Previous Qtr BA	(0.0003)	(0.0003)	(0.0003)	(0.0085)	(0.0085)	(0.0085)	0.0178	0.0178	0.0178	(0.0836)	(0.0836)	(0.0836)	(0.0296)	(0.0296)	(0.0296)
Current Qtr BA	(0.0085)	(0.0085)	(0.0085)	0.0178	0.0178	0.0178	(0.0836)	(0.0836)	(0.0836)	(0.0296)	(0.0296)	(0.0296)	(0.0149)	(0.0149)	(0.0149)
	(0.0675)	(0.0675)	(0.0675)	0.0142	0.0142	0.0142	(0.0746)	(0.0746)	(0.0746)	(0.1039)	(0.1039)	(0.1039)	(0.1103)	(0.1103)	(0.1103)
3rd Previous Qtr AA	0.2889	0.2889	0.2889	0.0744	0.0744	0.0744	0.0554	0.0554	0.0554	(0.6123)	(0.6123)	(0.6123)	(0.0987)	(0.0987)	(0.0987)
2rd Previous Qtr AA	0.0744	0.0744	0.0744	0.0554	0.0554	0.0554	(0.6123)	(0.6123)	(0.6123)	(0.0987)	(0.0987)	(0.0987)	0.1235	0.1235	0.1235
Previous Qtr AA	0.0554	0.0554	0.0554	(0.6123)	(0.6123)	(0.6123)	(0.0987)	(0.0987)	(0.0987)	0.1235	0.1235	0.1235	0.9224	0.9224	0.9224
Current Qtr AA	(0.6123)	(0.6123)	(0.6123)	(0.0987)	(0.0987)	(0.0987)	0.1235	0.1235	0.1235	0.9224	0.9224	0.9224	0.3828	0.3828	0.3828
	(0.1936)	(0.1936)	(0.1936)	(0.5812)	(0.5812)	(0.5812)	(0.5321)	(0.5321)	(0.5321)	0.3348	0.3348	0.3348	1.3300	1.3300	1.3300
Third previous qtr BA AA	0.2889	0.2889	0.2889				(0.0836)	(0.0836)	(0.0836)	(0.0836)	(0.0836)	(0.0836)	(0.0836)	(0.0836)	(0.0836)
	(8,828.21)	(10,585.41)	(12,694.61)	(12,694.61)	(12,694.61)	(9,885.87)	(8,660.30)	(7,591.64)	(6,813.99)	(6,020.79)	(5,477.31)	(4,951.55)	(4,372.62)	(3,985.64)	(3,511.62)
						(0.0836)	3rd								
Third previous qtr BA AA	0.0744	0.0744	0.0744	0.0744	0.0744	0.0744				(0.0296)	(0.0296)	(0.0296)	(0.0296)	(0.0296)	(0.0296)
	567.32	114.74	(428.50)	(1,423.69)	(2,458.64)	(3,368.44)	(3,368.44)	(3,368.44)	(3,604.04)	(3,323.19)	(3,130.76)	(2,944.61)	(2,739.63)	(2,602.61)	(2,434.78)
									(0.0296)	3rd					
Second previous qtr BA AA	0.0554	0.0554	0.0554	0.0554	0.0554	0.0554	0.0554	0.0554	0.0554				(0.0149)	(0.0149)	(0.0149)
	3,238.18	2,900.97	2,496.21	1,754.70	983.58	305.70	(507.01)	(1,215.66)	(1,731.33)	(1,731.33)	(1,731.33)	(1,722.96)	(1,619.93)	(1,551.06)	(1,466.70)
												(0.0149)	2nd		
Previous qtr BA AA	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	(0.6123)	11,449.73	11,449.73	11,588.35
	(57,082.38)	(53,357.72)	(48,886.93)	(40,696.68)	(32,179.21)	(24,691.67)	(15,714.95)	(7,887.57)	(2,191.70)	3,618.06	7,598.80	11,449.73			0.0976
Balance adjustment BA			(10,781.70)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)	(0.0987)
				(9,461.61)	(8,088.78)	(6,881.95)	(5,435.10)	(4,173.50)	(3,255.45)	(2,319.05)	(1,677.44)	(1,056.75)	(373.30)	83.55	643.15
						13,799.86	0.1235	0.1235	0.1235	0.1235	0.1235	0.1235	0.1235	0.1235	0.1235
							11,989.63	10,411.17	9,262.55	8,090.96	7,288.22	6,511.64	5,656.54	5,084.94	4,384.81
Third previous quarter AA										0.9224	0.9224	0.9224	0.9224	0.9224	0.9224
									106,422.23	97,670.85	91,674.57	85,873.83	79,486.46	75,216.85	69,987.05
Second previous quarter AA													44,171.57	41,520.44	37,577.61
													0.3828	0.3828	0.3828
Previous quarter AA															(39,395.90)

Sales History

Navitas KY NG, LLC

	J	F	M	A	M	J	J	A	S	O	N	D	Total
Sales in MCF													
2007	3,187	5,015	1,657	1,472	961	784	327	400	379	859	1,941	2,359	19,341
2008	6,960	4,115	3,761	1,428	1,408	637	786	683	851	1,129	3,712	3,441	28,911
2009	5,621	4,445	3,436	1,575	952	680	726	669	749	1,336	1,726	5,564	27,479
2010	5,820	6,407	4,116	1,569	999	1,082	771	644	1,097	1,384	1,726	5,564	31,179
2011	5,820	6,407	2,727	1,673	1,301	1,129	739	877	810	1,253	2,602	3,335	28,674
2012	5,134	3,661	1,929	1,177	1,253	880	1,046	1,227	1,049	1,813	3,673	2,854	25,694
2013	6,073	4,304	5,380	2,531	1,603	911	810	1,047	1,051	1,618	2,334	3,906	31,568
2014	6,465	5,710	3,962	2,176	1,037	999	957	854	969	1,749	3,252	4,410	32,540
2015	9,046	11,867	13,351	9,115	8,724	6,472	6,062	5,148	5,562	7,939	8,721	7,043	99,050
2016	11,015	10,109	9,340	7,794	5,474	4,778	4,594	4,462	5,505	5,465	7,363	8,826	84,725
2017	7,634	6,393	7,774	6,650	3,981	3,459	2,704	4,983	6,437	6,306	10,869	12,716	79,906
2018	12,306	12,391	13,164	13,164	6,961	6,678	5,672	6,855	6,083	7,301	13,376	13,910	117,861
2019	12,228	14,660	12,783	9,302	9,488	6,501	6,289	6,925	4,629	5,670	11,476		99,951
Average	10,446	11,084	11,282	9,205	6,926	5,578	5,064	5,675	5,643	6,536	10,361	10,624	98,423
	117,783	120,052	119,671	115,809	118,336	118,159	118,776	118,846	113,165	114,160	116,667	117,861	

*Joseph M Irwin
Navitas KY NG, LLC
3186-D Airway Avenue
Costa Mesa, CA 92626

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