

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED GAS ADJUSTMENT	)	CASE NO.
FILING OF NAVITAS KY NG, LLC	)	2024-00401

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

Navitas KY NG, LLC (Navitas KY), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on February 28, 2025. The Commission directs Navitas KY to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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.

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Navitas KY shall make timely amendment to any prior response if Navitas KY obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete 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 and scanned 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<sup>2</sup> to Commission Staff's First Request for Information issued in the Commission's final Order in Case No. 2023-00428 (Staff's Case No. 2023-00428 Request)<sup>3</sup>, Item 1. Also, refer to Case No. 2023-00428, Navitas KY's response to Commission Staff's Second<sup>4</sup> (Staff's Second Request), Item 2.

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<sup>2</sup> See document titled "Responses\_to\_Commission\_Staffs\_First\_Requests\_Case\_No.\_2024-00401.pdf" (filed. Dec. 31, 2024).

<sup>3</sup> Case No. 2023-00428, *Electronic Purchased Gas Adjustment Filing of Navitas Ky Ng, LLC* (KY. PSC Oct. 31, 2024), Order, Appendix B.

<sup>4</sup> Case No. 2023-00428, *Electronic Purchased Gas Adjustment Filing of Navitas Ky Ng, LLC* (filed. Mar. 1, 2024), Navitas KY's response to Commission Staff's Second Request for Information, Item 2.

a. Elaborate on Navitas KY's statement that there was a "misunderstanding" that Navitas KY did not receive any equipment from Kinetrex given that in response to Staff's Second Request, Item 2, Navitas KY states that Kinetrex provides Navitas KY the service of "[Liquid Natural Gas (LNG)] Equipment in Albany KY to address the winter gas supply issues".

b. Explain how Navitas KY achieves regassification of the LNG purchased.

c. Provide a detailed report identifying the monthly volume of physical LNG purchased for the period beginning with Navitas KY's Gas Cost Recovery (GCR) rate report filing in Case No. 2022-00189<sup>5</sup> through to the present period.

d. Provide a copy of any contract agreement between Navitas KY and Kinetrex related to LNG services and equipment.

2. Refer to Navitas KY's response to Staff's Case No. 2023-00428 Request, Item 2, Exhibit 2, unnumbered pages 29–40.<sup>6</sup> Explain the purpose of Kinetrex's monthly "reservation fee" of \$3,700 and explain why the expense should be included in the GCR rate report.

3. Refer to Navitas KY's response to Staff's Case No. 2023-00428 Request, Item 4, Exhibit 4.<sup>7</sup> Provide a table, in Excel spreadsheet format with all formulas, rows,

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<sup>5</sup> Case No. 2022-00189, *Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC* (Ky. PSC Aug. 4, 2022).

<sup>6</sup> See document titled "Responses\_to\_Commission\_Staffs\_First\_Requests\_Case\_No.\_2024-00401.pdf" (filed. Dec. 31, 2024), Item 2, Exhibit 2.

<sup>7</sup> See document titled "Responses\_to\_Commission\_Staffs\_First\_Requests\_Case\_No.\_2024-00401.pdf" (filed. Dec. 31, 2024), Item 4, Exhibit 4.

and columns fully accessible and unprotected, of all monthly invoice total prices, and all monthly invoice total volumes with supplier name and transaction included.

4. Refer to Navitas KY's GCR rate report<sup>8</sup>, Schedule II. Provide a detailed reasoning for why Navitas KY's line loss is 21.7 percent. If Navitas KY's actual annual line loss is reported to be less than the percentage shown, provide documented evidence to support the actual line loss.

5. Refer to Navitas KY's GCR rate report, Schedule II. Provide a recalculation of the sheet to include the 5 percent line loss limiter calculation stipulated in the "Allowable Mcf Purchases" row by the "(must not exceed Mcf sales ÷ .95)" statement.

6. Refer to Navitas KY's GCR rate report, Schedule IV. Provide a recalculation of Schedule IV to include the 5 percent line loss limiter calculation stipulated in the "Total Sales" row by the "(may not be less than 95% of supply volumes)" statement.

7. Refer to Navitas KY's GCR rate report, Schedule IV, regarding the "[Expected Gas Cost] EGC in effect for month." Also, refer to Navitas KY's response to Staff's Case No. 2023-00428 Request, Item 6, which states that "The GCR charge to Navitas KY NG customers has not changed since the Commission's final Order in Case No. 2023-00325." Explain why Navitas KY used the rate of \$4.4962 per Mcf for the EGC in effect for the months of August, September, and October 2024 rather than the Case No. 2023-00325 Commission approved EGC rate of \$6.9999 per Mcf.<sup>9</sup>

8. Refer to Navitas KY's GCR rate report materials, document titled "Compliance\_with\_Order\_in\_Case\_No.\_2023-00428.pdf" (Navitas KY Compliance

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<sup>8</sup> See document titled "2024-00401\_GCR\_Navitas\_(PSC\_Form).pdf" (filed. Dec. 31, 2024).

<sup>9</sup> Case No. 2023-00325, *Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC* (KY. PSC October 30, 2023), Order.


Letter), subheading titled: "Report Formatting." Navitas KY states that "the Commission's PDF template does not contemplate cross-border transportation of natural gas, nor does it keep a running total of Costs in Excess of Billings/Billings in Excess of Cost, which is critical to Navitas KY's business."

a. Explain in detail what Navitas KY means by "does not contemplate cross-border transportation of natural gas."

b. Explain in detail what Navitas KY means by "keep a running total of Costs In Excess of Billings/Billings In Excess of Cost."

9. Refer to Navitas KY's GCR rate report materials, Navitas KY Compliance Letter, subheading titled: "Surcharge (Case No. 2020-00396) (Johnson County)." Provide an updated tariff sheet reflecting that "this rider is turned off."

10. Refer to Case No. 2023-00428, Navitas KY's response to Commission Staff's Third Request for Information, Item 2, regarding the line, "Note that a new source of supplemental gas supply is being procured for Clinton County and usage of LNG as a supplemental source is not expected to continue." Explain in detail the new source of supplemental gas supply that Navitas KY is procuring for its Clinton County gas system.

  
Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED       FEB 13 2025      

cc: Parties of Record

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