

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ALLEGED FAILURE OF NAVITAS	)	
KY NG, LLC TO COMPLY WITH KRS 278.030,	)	CASE NO.
KRS 278.180(1), KRS 278.274, COMMISSION	)	2025-00010
ORDERS, AND ITS GAS COST RECOVERY	)	
TARIFF	)	

COMMISSION STAFF'S SECOND 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 April 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

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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).

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 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. Confirm whether Navitas KY has been charging the Commission-approved Gas Cost Recovery (GCR) rates to its customers since 2018. If not, provide the instances in which Navitas KY failed to charge the Commission approved GCR rate, for each instance what GCR rate, if any, was charged, and when the incorrect GCR rate was applied.

2. Confirm whether all rates and charges included in Navitas KY's current tariff on file with the Commission reflect the current rates and charges being billed to Navitas KY's customers.

3. Refer to Navitas KY' Purchased Gas Cost Adjustment Clause tariff.<sup>2</sup> The tariff states, "The GCR shall become effective for billing with the final meter readings of the first billing cycle of each calendar quarter". For an example, assume the Commission approved a GCR rate with an effective date of February 1, 2025. Explain if Navitas KY applies the Commission approved GCR rate to customer billings received on or around February 1, 2025, or if Navitas KY applies the Commission approved GCR rate to customer usage metered on and after February 1, 2025.

4. Refer to Navitas KY's response to Commission Staff's First Request for Information (Staff's First Response), Item 1.

a. Explain if there was ever a cross over in expenses related to Russmar Utility Management (Russmar) being included in Navitas KY's proposed revenue requirement in Case No. 2024-00252, and Navitas KY's prior proposed GCR rate reports.

b. Identify where in the proposed Case No. 2024-00252 case proceeding the Russmar expenses totaling \$12,000 were included in the revenue requirement calculation.

5. Refer to Navitas KY's response to Staff's First Request, Item 2b. Explain in detail what Navitas KY means by "The Navitas KY NG chart of accounts maps the customer refund to a liability account."

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<sup>2</sup> P.S.C. KY No. 1, Original Sheet No. 24 at unnumbered p. 26, effective March 1, 2011.

6. Refer to Navitas KY's response to Staff's First Request, Item 2b. Explain what "P&L" stands for.

7. Refer to Navitas KY's response to Staff's First Request, Item 3b. Explain in detail the steps Navitas KY is taking to ensure that its officers are aware and in compliance with all applicable laws, regulatory requirements, and Orders issued by the Commission.

8. State whether Navitas KY is aware of it violating any other Commission Orders that may have occurred during the last five-year period in any jurisdiction.

9. Refer to Navitas KY's response to Staff's First Request, Item 5b.

a. Identify the service provided to Navitas KY by Russmar and explain why Navitas KY required this service to be performed.

b. Explain how Navitas KY "does not believe there is a written contract associated with this matter".

c. Explain how Navitas KY currently preserves its written contracts and the procedure in place to ensure continued compliance to its contracts.

d. Explain why Navitas KY decided to enter into a verbal agreement for service rather than a written agreement.

10. Refer to Navitas KY's response to Staff's First Request, Item 5c.

a. Explain if Navitas KY has ever encountered a similar pressure issue on its gas system before this occurrence.

b. Provide a detailed explanation for any plans Navitas KY has for ensuring that a similar pressure issue does not occur again in the future.

c. Explain whether Navitas KY was made aware of the MAOP of the B&W pipeline.

d. Explain in detail the other options considered by Navitas KY to fix the pressure issue on its gas system.

11. Refer to Navitas KY's response to Staff's First Request, Item 5c. Also, refer to Navitas KY's response to the February 3, 2025 opening Order in this case, page 2, regarding "Russmar Utility Management (related to ensuring the safe transport and delivery of natural gas via pressure monitoring)." Explain if any connection exists between the pressure issue discussed in the response and Navitas KY's agreement of service with Russmar. If so, then provide any additional documentation supporting the response.

12. Refer to Navitas KY's response to Staff's First Request, Item 6.

a. Provide any additional documentation to support the values presented in the table of the response.

b. Provide an update to the table in Item 6, separating out the three distinct gas systems owned by Navitas (i.e., Clinton County system, Johnson County system, and the Floyd County system).

*Linda Bridwell PE*

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DATED APR 14 2025

cc: Parties of Record

Case No. 2025-00010

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