

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED GAS ADJUSTMENT	)	CASE NO.
FILING OF NAVITAS KY NG, LLC	)	2026-00169

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 September 16, 2026. The Commission directs Navitas KY to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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. Identify all Federal Energy Regulatory Commission (FERC) approved tariff sheets that Navitas KY, Navitas Utilities Services Corporation, or any other Navitas related affiliate utilize in providing natural gas procurement, natural gas transportation, or any related services to Navitas KY. For each identified FERC tariff sheet, provide the company name, tariff title, volume number, sheet or section designation.

2. Confirm whether any Navitas KY, Navitas Utilities Services Corporation, or any other Navitas affiliate utilized to serve Kentucky customers (collectively, Navitas Related Affiliate) take service under Rate Schedule Load Management Market Area (LMS-MA) under East Tennessee Natural Gas, LLC's FERC tariff. If not confirmed, explain which rate schedule any Navitas Related Affiliate takes service.

3. Refer to Navitas KY's GCR rate report filing, page 1, regarding the cashout on the Spectra pipeline. Provide a detailed explanation of how the imbalance resolution procedures and cashout work. In this explanation include the following:

a. What actions Navitas KY or Navitas Related Affiliates took to correct any imbalances occurring during the Month by making adjustments in nominations or deliveries.

b. Whether Navitas KY or Navitas Related Affiliates was subject to a Maximum Allowed Delivery (MAD) Service Charge, and if so whether that was reflected in the invoices billed to Navitas Utilities Corporation.

c. Whether Navitas KY or Navitas Related Affiliates utilized East Tennessee Natural Gas, LLC's Imbalance Management services to reduce or eliminate their monthly cash-out liability. If not, explain why not.

d. Whether Navitas KY or Navitas Related Affiliates tried to trade an imbalance with another balancing party taking service under LMS-MA or Load Management Pooling Area Service (LMS-PA). If not, explain why not.

4. Refer to Navitas KY's Supplier Invoices, filed on July 16, 2026,² from Enbridge for services for the month ending February 28, 2026.

² Supplier Invoices (filed July 16, 2026) under confidential protection.

a. Provide a detailed breakdown and explanation of how the cashout imbalances billed for services on February 2026 was calculated.

b. Explain whether the invoice from Enbridge billed to Navitas Utilities Services Corporation in February 2026 was solely for Navitas KY's expenses.

5. Refer to Navitas KY's Gas Cost Recovery (GCR) rate report version filed in Excel Spreadsheet,³ tab titled, "Purchases", Columns F through D and Rows 5 through 11.

a. Explain how Navitas KY determined the percentage allocation for the portion of gas usage between Tennessee customers and Navitas KY's Kentucky ratepayers.

b. Provide additional documentation to support the allocation percentages.

6. Refer to Navitas KY's GCR rate report in Excel Spreadsheet, tab titled, "Sch II ECG", Cell M22. Also, refer to the supplemental filings Navitas KY provided on July 16, 2026, February 2026 invoices for Enbridge Energy (Enbridge) at 1-2.

a. Explain how Navitas KY derived the \$10,577.67 figure reflected in its Excel Spreadsheet when the Enbridge invoice provided by Navitas KY shows an amount of [REDACTED] for February 2026.

b. If the \$10,577.67 figure represents something other than the invoiced amount, explain the basis for its inclusion into the gas cost calculation.

c. Explain how the "Imbalance Quantity" used by Enbridge to determine the amount owed by Navitas KY is calculated. Specifically, explain how Enbridge

³ Navitas GCR rate report, Excel spreadsheet version (filed July 1, 2026).

calculated the “Imbalance Quantity” of [REDACTED] Mcf and amount owed of \$173,486.11. Additionally, explain the factors contributing to why the amount owed is significantly higher this month compared to prior months.

7. Refer to Navitas KY’s GCR rate report in Excel Spreadsheet, tab titled, “Sch II ECG”, Cell I33. Also, refer to the supplemental filings Navitas KY provided on July 16, 2026, April 2026 invoices for Petrol Energy, LLC (Petrol), Invoice 540 through 543.

a. Explain why Navitas KY included the January differential, March, and February gas costs into the April calculation of gas costs.

b. Explain whether Navitas KY separately accounted for Petrol’s billings attributable to February, March, and April when calculating the ACA component. If not, explain how Navitas KY accounted for the resulting increase in April’s gas costs when calculating the ACA component.

c. Provide a calculation of the ACA component that appropriately assigns the gas cost to each month the cost was incurred in an Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

8. Refer to Case No. 2026-00072⁴, Navitas KY’s Response to Staff’s First Request for Information (Staff’s First Request), Item 1. Provide the full facts and circumstances, as well as a detailed explanation and understanding of the bill from Enbridge for the East Tennessee Pipeline.

9. Provide all contracts or agreements between Navitas KY and each of its gas suppliers and transporters from which Navitas KY purchases gas used to serve its

⁴ Case No. 2026-00072, *Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC*, Navitas KY’s Response to Staff’s First Request for Information (Staff’s First Request) (filed May 29, 2026), Item 1.

customers. If no written contract exists, provide the terms of the agreement for the applicable supplier or transporter.

10. Provide the invoices for B&W Pipeline for the months of August, September, and October 2025. Additionally, provide the invoices for Enbridge for the months of May, June, July, and August 2025.


Justin McNeil
Executive Director
Public Service Commission
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DATED AUG 31 2026

cc: Parties of Record

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