

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)	

NAVITAS KY NG, LLC'S RESPONSE TO COMMISSION

STAFF'S

THIRD REQUEST FOR INFORMATION

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.

WITNESS: THOMAS HARTLINE

Please see attached electronic spreadsheet.

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 reflect the bill as originally received by Navitas KY.

WITNESS: THOMAS HARTLINE

Please see attached invoice groups from B&W Pipeline: Originals received

email dated December 17, 2019 with spreadsheet (that would become Exhibit A).

Please see attached correspondence groups from Navitas: email dated December 2, 2019 with spreadsheet (that would become Exhibit G);

- 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).

WITNESS: THOMAS HARTLINE

Referred.

- 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.

WITNESS: THOMAS HARTLINE

The total volume numbers are extremely close 174,104 MCF submitted by Navitas and 174,246 MCF submitted by B&W Pipeline. Thus, presumably other than the slightest of timing differences on the read date these appear to be the same.

- 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.

WITNESS: THOMAS HARTLINE

WITNESS: THOMAS HARTLINE

Given the delta between the figures is only approximately 0.1%, Navitas views both figures as ostensibly the same save for the aforementioned timing difference.

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.

WITNESS: THOMAS HARTLINE

Yes, but not in their entirety. Navitas initially paid the original pro rata share of the invoices that were under the old Tennessee rate. Additionally, Navitas paid the undisputed portion of the new FERC tariff. The disputed portion, from February through September, has yet to be paid. This is in accordance with section 6.12(D) of the B&W Pipeline Statement of Operating Conditions, "If a portion of an invoice is disputed, Shipper shall pay when due the portion of the invoice not in dispute..."¹

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

WITNESS: THOMAS HARTLINE

Please see attached invoice groups: Originals received monthly for February 2019 through May 2019, Letter dated June 18, 2019, Letter dated December 17, 2019.

- b. Confirm that the billings are based on the meter readings conducted

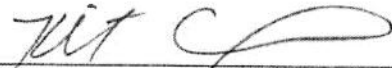
¹ (Statement of Operating Conditions of B&W Pipeline, LLC at 18)

WITNESS: THOMAS HARTLINE

It is the expectation of Navitas that the invoices from B&W Pipeline are from their meter readings and these readings are done in accordance with industry standards.

Dated this 6th day of May, 2020.

Respectfully submitted,



Klint W. Alexander (BPR #88343)
1767 Nottage Ct
Laramie, WY 82072
Tel: 615.594.4377
Email: klint.alexander10@gmail.com
Counsel for Navitas KY NG, LLC

&

Brenda Bott
Navitas Utility Corporation
3186D Airway Avenue
Costa Mesa, CA 92626
(714) 242-4061 Office
(714) 850-0876 Fax
Email: bbott@navitasutility.com

VERIFICATION OF NAVITAS KY NG, LLC

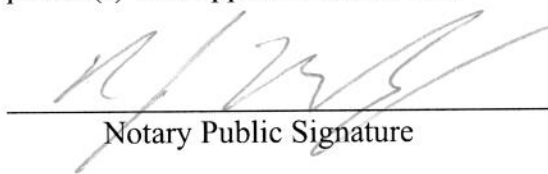
STATE OF CALIFORNIA)
) ss.
COUNTY OF ORANGE)

I, Thomas Hartline, Secretary of Navitas KY NG, LLC, being duly sworn according to law, makes oath and affirm that I have read the foregoing documentation, know the contents thereof, and that the same is true and accurate to the best of my knowledge, information and belief.



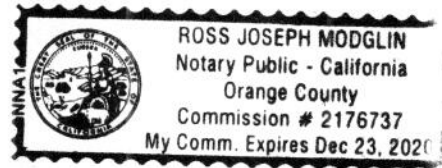
THOMAS HARTLINE

Subscribed and sworn to (~~or affirmed~~) before me on this 6th day of May, 2020, by Thomas Hartline, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Notary Public Signature

Notary Public Seal

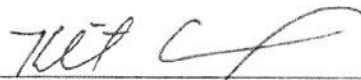


CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of May, 2020, a true and correct copy of the foregoing instrument was deposited in the United States Mail with postage prepaid, and addressed to the following:

Gwen Pinson
Executive Director
Public Service Commission
Commonwealth of Kentucky
211 Sower Blvd.
Frankfort, KY 40601

Larry Cook
Office of the Attorney General
Rate Intervention
700 Capitol Ave. Suite 20
Frankfort, KY 40601



Klint W. Alexander