

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC APPLICATION OF NAVITAS KY )      CASE NO. 2019-00430  
NG, LLC FOR AN ALTERNATE RATE      )  
ADJUSTMENT      )**

**NAVITAS KY NG, LLC’S SUPPLEMENTAL RESPONSE TO COMMISSION STAFF’S  
FIRST REQUEST FOR INFORMATION**

Navitas KY NG, LLC (“Navitas”), pursuant to the Commission’s Order entered March 3, 2020, hereby submits the following supplemental and corrected Response to the Commission Staff’s First Request for Information. Navitas provides as follows:

3. Refer to Navitas KY supplemental filing, Exhibit G.
  - a. ....
  - b. Refer to Navitas KY supplemental filing, Exhibit G, the row labeled “TN customers sales”. Also, refer to the GCR reports filed in Case No. 2018-00228, Case No. 2018-00336; Case No. 2019-00013; and Case No. 2019-00116, Actual Cost Adjustment schedule, the row labeled “Byrdstown/Fentress (TN).” Reconsolidate the differences in Tennessee customer sales for the months of January 2018 through January 2019.

**WITNESS: THOMAS HARTLINE**

Navitas noticed an error in its previous response to this information request. It appears that as the data was transferred to the response it was pulled from the wrong row of the original spreadsheet for some months. Those months are highlighted below.

Tennessee customer sales on the Byrdstown and Fentress subsystem.

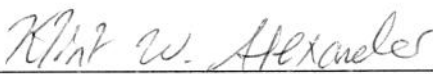
<b>Month</b>	<b>GCA's recheck</b>	<b>Exhibit G</b>	<b>Bill Edit Lists</b>
JUL 2017	212.3	212	212
AUG	177.1	177	177
SEP	288.7	289	289
OCT	725.4	725	725
NOV	960.4	960	962
DEC 2017	2023.2	2023	2063
JAN 2018	4144.8	3943	4203
FEB	1868.6	1690	1880
MAR	2109.4	1922	2088
APR	962.6	813	946
MAY	330.9	247	333

JUN	246.1	130	248
JUL	233.1	127	210
AUG	330.9	122	233
SEP	246.1	133	240
OCT	233.1	414	498
NOV	330.9	1154	1154
DEC	246.1	2057	2057
JAN 2019	233.1	2460	2461
<b>Total</b>	<b>15,903</b>	<b>19,599</b>	<b>20,980</b>

Navitas has discovered a report anomaly within its billing system. For the 2019-00430 Navitas ran the Bill Edit Lists for the Byrdstown/Fentress system. As the KYPSC has noted by this question there is a delta between the figures in the GCA filings and the Exhibit G filing. During the reconciliation process Navitas reran its two Tennessee sub systems separately, then compared those with the original monthly Bill Edit Lists totals for the state. Where the two separately should total the original monthly they did not, in fact there was quite a large delta. In researching the issue, a report programing difference was noted. When running the two subsystems separately the report excludes closed out customers from the subsystem totals. We sought the assistance of the software supplier to recode the report and include the closed out (internally called finaled) customer data. Subsequent to their reprograming efforts, Navitas again reran the sub systems and compared them to the original total. This iteration, twelve of the seventeen months yielded no appreciable difference (e.g. – either zero or one - attributed to rounding), of the remaining months only one month had a noticeable delta of 51 MCF (approximately ¾ of 1% of the monthly amount). This reduction of 51 MCF was likely due to a corrected misread

Dated this 18th day of March, 2020.

Respectfully submitted,

  
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 Counsel for Navitas KY NG, LLC

*W/ permission  
 by Brenda Barth*

&

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**VERIFICATION OF NAVITAS KY NG, LLC**

STATE OF CALIFORNIA            )  
  )  
COUNTY OF ORANGE            )            ss.

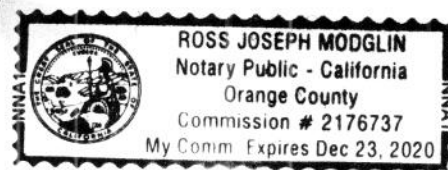
I, Thomas Hartline, Secretary of Navitas KY NG, LLC, being duly sworn according to law, makes oath and affirm that I have read the foregoing documentation, know the contents thereof, and that the same is true and accurate to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
THOMAS HARTLINE

Subscribed and sworn to (~~or affirmed~~) before me on this 18<sup>th</sup> day of March, 2020, by Thomas Hartline, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Notary Public Seal

  
\_\_\_\_\_  
Notary Public Signature



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 18 day of March, 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 *with permission*  
Klint W. Alexander  
*by Brenda Batt*