



December 20, 2018

VIA U.S. MAIL

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

RE: Navitas KY NG, LLC - Letter Requesting Staff Opinion

Dear Ms. Pinson:

I am legal counsel for Navitas KY NG, LLC, a regulated natural gas distributor in Clinton County, Kentucky. Navitas operates a natural gas distribution system in Albany, Clinton County, Kentucky servicing approximately 125 customers. Small and mid-size meters for many of the customers are due to be tested for meter accuracy as the units approach ten (10) years in operation. 807 KAR 5:022 governs the testing of gas meters and section 17 provides for deviations from the rule in special cases for good cause shown. The purpose of this letter is to request a Staff Opinion regarding the following:

Navitas is considering seeking a deviation from the rule requiring meter shop certification. Currently, Navitas operates LDCs in four state jurisdictions serving approximately 5,000 meters of all sizes. At its operational headquarters in Eakly, Oklahoma a meter shop is maintained to test and rebuild meters for the customers served by Navitas. Prior to acquiring the Gasco system in Kentucky out of bankruptcy, Navitas was not required to have outside certification of its meter shop. In the absence of a certification requirement by the proximate jurisdictions in Texas and Oklahoma, there is a dearth of entities available to perform said certification. As a work around to its lack of third party certification, Navitas elected to install only new meters in Kentucky and rely on the testing provided by the factory at time of manufacture. This has worked well for the installation of meters; however, we recognize that in the coming years these meters will begin to be changed out. While new meters can again be installed and the existing meters can be rebuilt and deployed to other jurisdictions, there is the matter of testing the meters for compliance as they come off line. Thus, Navitas is requesting that the Public Service Commission allow for the post use testing of meters to be performed in our Eakly Oklahoma shop that is not certified by a third party.

To assist you with your evaluation of this request, enclosed please find a copy of our incoming meter check procedures.

Please email your response to klint.alexander10@gmail.com or send by U.S. mail to the address below. Thank you very much for your consideration of this request.

Sincerely yours,



Klint Alexander, Esq.
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cc: Thomas Hartline
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Navitas Utility Corporation
P.O. Box 183
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11/19/2018

Incoming meter check procedures:

- All Meters are to be brought into the Navitas Operational Headquarters, located in Eakly Oklahoma, to be tested and checked for accuracy.
- Meters must be temperature normalized for a minimum of 24 hours and the temperature must remain static for the entire duration.
- Meters brought in must contain the account name, account number, and location (system) from where the meter was removed.
- Meters are visually inspected for damage and overall condition.
- Meters are then tested using an American 10 ft. bell prover.
- Meters are checked at 80% capacity rate and 20% check rate.
- Meter reading are then adjusted for necessary temperature correction.
- Meter number, account number, and readings are all entered into a secure computer database by the technician running the test.
- All information is reviewed by the Chief Measurement Technician, who makes a detailed report.
- Any meter that does not meet the meter accuracy parameters is reported to the Navitas Billing Manager to make necessary compensation to the account holder or the Navitas Company as required or allowed by Law.

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