

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

In the Matter of:

THE JOINT ELECTRONIC)	
APPLICATION OF NAVITAS)	
KY NG, LLC, JOHNSON)	CASE NO. 2020-00396
COUNTY GAS COMPANY,)	
AND B&H GAS SYSTEM)	
FOR APPROVAL OF)	
ACQUISITION, TRANSFER)	
OF OWNERSHIP, AND)	
CONTROL OF NATURAL)	
GAS UTILITY SYSTEMS)	

**AMENDED RESPONSE OF NAVITAS KY NG, LLC, JOHNSON COUNTY GAS
COMPANY, AND B&H GAS SYSTEM'S TO COMMISSION'S
POST-HEARING REQUEST FOR INFORMATION**

Navitas KY NG, LLC (“Navitas”), Johnson County Gas Company, Inc. (“JCG”), and B&H Gas Company, Inc. (B&H), by and through counsel, hereby submit the following Amended Response to the Kentucky Public Utility Service Commission’s March 18, 2021 filing in case No. 2020-00396, Commission’s Post-Hearing Request for Information. Navitas, JCG, and B&H provides as follows:

On April 5, 2021, the Applicants submitted their Post-Hearing Data Responses, which contained certain formulas from the Gas Purchase Agreements, previously submitted to this Case No. 2020-00396 docket on March 15, 2021. On these original Gas Purchase Agreements, the formulas were mistakenly allocated to the wrong systems. The Applicants now seek to Amend their Responses to the Post-Hearing Request for Information as to the Gas Purchase Agreement formulas.

1. Refer to the Gas Purchase Agreement between Hall Stephens and Hall and Navitas KY. Clarify which NYMEX index is indicated in the gas contract formula provided of NYMEX plus \$2.00.

RESPONSE OF THOMAS HARTLINE:

For gas purchased by Navitas from HSH, the correct index is month ahead NYMEX¹.

2. Using the Gas Purchase Agreements between Hall Stephens and Hall and B&S Oil and Gas and Navitas KY, based on the most current gas cost information available, provide an example calculation for each company showing how the parties intend the gas from Hall Stephens and Hall and B&S to be priced to Navitas KY.

RESPONSE OF THOMAS HARTLINE:

Gas purchased from B&S Gas:

$$(\text{PSC Calculation}^2 + 2.00) * \text{Volume MMBtu}$$

Gas purchased from Hall, Stevens, Hall:

For transport to the HSH City Gate:

$$(\text{Month ahead NYMEX}^3 + 2.00 + \text{Transport Cost}) * \text{Volume MMBtu}$$

For transport at the well head:

$$(\text{Month ahead NYMEX}^4 + 2.00) * \text{Volume MMBtu}$$

¹ https://www.cmegroup.com/trading/energy/natural-gas/natural-gas_quotes_globex.html#

² Pursuant to the KY PSC May 4, 2017 Order in Case No. 2015-00367.

³ https://www.cmegroup.com/trading/energy/natural-gas/natural-gas_quotes_globex.html#

⁴ https://www.cmegroup.com/trading/energy/natural-gas/natural-gas_quotes_globex.html#

On this the 22 day of April, 2021.

Respectfully submitted,

/s/ Klint W. Alexander
Klint W. Alexander (# 88343)
1767 Nottage Ct
Laramie, WY 82072
Tel: 615.594-4377
Email: klint.alexander10@gmail.com
Counsel for Navitas KY NG, LLC

/s/ Joe F. Childers
Joe F. Childers (# 11850)
Childers & Baxter, PLLC
The Lexington Building
201 West Short Street, Suite 300
Lexington, Kentucky 40507
Telephone: (859)253-9824
Facsimile: (859)258-9288
Email: childerslaw81@gmail.com
Counsel for B&H and JCG

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22 nd day of April, 2021, a true and correct copy of the foregoing instrument was deposited in the United States Mail with postage prepaid, and addressed to the following:

Linda C. Bridwell
Executive Director
Public Service Commission
Commonwealth of Kentucky
211 Sower Blvd.
Frankfort, KY 40601

J.E.B. Pinney, Esq.
General Counsel
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

/s/ Klint W. Alexander
Klint W. Alexander

/s/ Joe F. Childers
Joe F. Childers

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

On April 21st 2021 before me, (K. L. SHIPLER LOTT), personally appeared THOMAS EBEN HARTLINE, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) ~~is/are~~ subscribed to the within instrument and acknowledged to me that ~~he/she/they~~ executed the same in ~~his/her/their~~ authorized capacity(ies), and that by ~~his/her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Notary Public Seal


Notary Public Signature

