# 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	<i>)</i>
GAS UTILITY SYSTEMS	,

# SUPPLEMENTAL RESPONSE OF NAVITAS KY NG, LLC TO THE APRIL 14, 2021 SECOND INFORMAL CONFERENCE

Navitas KY NG, LLC ("Navitas"), pursuant to the Second Informal Conference held on April 14, 2021, by and through counsel, hereby submits the following Supplemental Response to the Kentucky Public Utility Service Commission's April 15, 2021 filing in Case No. 2020-00396. Navitas provides as follows:

First, as discussed in the April 14 Informal Conference, Navitas requests that the true-up be rolled into the PGA at the end of the accounting period. Specifically, Navitas requests the following:

- For the JCG customer, the final true-up amount less than \$250.00 will roll into the PGA; and
- For the B&H customer, the final true-up amount less than \$1,700.00 will roll into the PGA.

Second, in light of the Commission position that such Legacy Customers may continue this status should that customer drop off of the system and later be reconnected, Navitas no longer believes the Legacy Customer rider should be considered by the Commission in this matter. Navitas does not have an efficient way to track such Legacy Customers who would drop off and later be reconnected to the system under the same customer status. Navitas requests that the Commission cease consideration of Navitas' proposed Legacy Customer plan as outlined in the April 7, 2021 Supplemental Testimony of Thomas Hartline. As part of this filing Navitas is providing a draft rider for the refund to its B&H and JCG customers for review. This rider is to be included on Navitas' tariff and is attached herein as **Exhibit A**.

<sup>&</sup>lt;sup>1</sup> See, Case No. 2020-00396 Supplemental Testimony of Thomas Hartline (April 7, 2021).

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: <u>klint.alexander10@gmail.com</u> Counsel for Navitas KY NG, LLC

### **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.

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> /s/ Klint W. Alexander Klint W. Alexander