



Legal Counsel.

DINSMORE & SHOHL LLP
City Center
100 West Main Street ^ Suite 900
Lexington, KY 40507
www.dinsmore.com

M. Evan Buckley
(859) 425-1068 (Direct); (859) 425-1099 (Facsimile)
evan.buckley@dinsmore.com

August 16, 2024

VIA ELECTRONIC FILING

Ms. Linda C. Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

RE: Navitas KY NG, LLC – Alternative Rate Filing
Case No. 2024-00252 – *Response to Filing Deficiencies*

Dear Executive Director Bridwell:

On behalf of Navitas KY NG, LLC (“Navitas”), please accept this letter and its enclosures in response to your letter of August 7, 2024, regarding Navitas’ Alternative Rate Filing (“ARF”) submitted in the above-referenced case on August 2, 2024. Your letter described three (3) filing deficiencies, each addressed below.

1. 807 KAR 5:001 Section 8 (4) (b) (2): Each file in an electronic submission shall be search-capable. Upon further review, Navitas identified four (4) documents included with its ARF containing content lacking search-capability—ARF Form 1 and Attachments 1, 5, and 9. Search-capable versions of these documents are resubmitted herewith. Should any other documents appear non-compliant to Commission Staff, Navitas is happy to address such issues without delay.

2. 807 KAR 5:076 Section 5 (4) (c): The amount of the change requested in both dollar amounts and percentage change for each customer classification to which the proposed rates will apply; The decimals are not consistent. The per Ccf rates need to be displayed at least three decimal places out to reflect the full rate (both for the Clinton County and the Floyd/Johnson County notices); The percentage change in rates should be double checked to ensure no rounding errors or general errors (i.e., the percentage increase from \$99 to \$124 is not 457%); In Attachment 1 to Application Page 9 of 9, the bill impact for Agricultural should not be zero across the board by virtue of the existence of the customer charge. Additionally, an estimated average monthly usage can be used even in cases where no customers are present. Navitas has prepared a revised Customer Notice that: (i) displays to three

(3) decimal places the dollar change and percentage change between the current rates and proposed rates (please note, however, the rates proposed by Navitas have not changed); (ii) has been double-checked to ensure no rounding or general errors; and (iii) includes an estimated average monthly usage and bill impact information for Agricultural customers. The revised Customer Notice is submitted herewith as Attachment 1. At this time, Navitas has not re-mailed the revised Customer Notice as no deficiency was identified with respect to 807 KAR 5:076 § 5(2) and it appears re-mailing may be unnecessary. Navitas will re-mail the revised Customer Notice upon further direction from the Commission.

3. **807 KAR 5:076 Section 4 (1) (a): A completed Attachment SAO (Statement of Adjusted Operations) is attached; SAO is missing from application.** Navitas does not propose to adjust the test period amounts of revenue and expense items; consequently, Navitas indicated “No” in response to Item 10 of the ARF Form-1 and did not include a Statement of Adjusted Operations, as there are no adjustments from the test year to disclose. To the extent required, Navitas requests permission, pursuant to 807 KAR 5:076 Section 17, to deviate from the cited regulation requiring a completed Attachment SAO because Navitas does not believe that revenue or expense items set forth in its most recent annual report have changed or will change.

In accordance with 807 KAR 5:001, the undersigned certifies that a copy of this Read 1st Letter and its enclosures have been electronically transmitted to the Kentucky Public Service Commission on the date first set forth above, and there are currently no parties that the Commission has excused from participation by electronic means.

Please contact me should you have any questions or concerns, and thank you for your assistance with this matter.

Sincerely,

/s/ M. Evan Buckley

M. Evan Buckley

Enclosures

Certification

I hereby certify that a copy of this Read 1st Letter and its enclosures have been served electronically on all parties of record through the use of the Commission’s electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission’s July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ M. Evan Buckley

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