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September 17, 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 enclosure in response to your letter of September 10, 2024, regarding Navitas’ Application for Alternative Rate Filing (“ARF”) submitted in the above-referenced matter on August 2, 2024. Your letter described two (2) filing deficiencies, both concerning detail about non-recurring fees referenced in the Customer Notice.

The filing deficiencies relate to the failure to disclose the present and proposed rates for a “disconnection fee” (807 KAR 5:076 Section 5(4)(b)) and the amount of the requested change to the “disconnection fee” in both dollar amounts and percentage amounts (807 KAR 5:076 Section 5(4)(c)). The September 9, 2024 cover letter of the revised Customer Notice¹ generically refers to a “disconnection fee.” However, the Special Charge section of Navitas’ current tariff makes reference to a defined term, “Reconnection Charge.”² As a result, the corresponding chart disclosing the present and proposed rates and the amount of requested change in dollar amounts

¹ E.g., Revised Attachment 1, at Page 3 of 9 (filed September 9, 2024), available at: https://psc.ky.gov/psccef/2024-00252/jill.wall%40dinsmore.com/09092024042906/ATTACHMENT_1_-_Customer_Notices.pdf.

² Navitas Tariff, at PSC KY No. 1, Original Sheet No. , available at <https://psc.ky.gov/tariffs/Natural%20Gas/Local%20Distribution%20Companies/Navitas%20KY%20NG,%20LLC/Tariff.pdf>.

and percentage amounts refers to the “Reconnection Charge,”³ as that is the defined term used in the Tariff.

For clarity, there is no “disconnection fee” currently included in the Navitas tariff that Navitas seeks to amend, nor does Navitas seek to add a disconnection fee in this proceeding. Rather, Navitas seeks only to amend the “Reconnection Charge.”

Navitas hereby files an updated Customer Notice whereby the cover letter refers to an amendment to the “Reconnection Charge,” the term used in the Tariff, rather than the generic “disconnection fee” originally used in the Customer Notice. To provide further clarity, the revised Customer Notice now includes a reference to all non-recurring charges for which amendment is sought in this proceeding, using the specific terms set forth in the Navitas Tariff. All such non-recurring charges set forth in the cover letter are included in the corresponding chart of proposed changes, including the present rate, proposed rate, dollar change, and percentage change.

Navitas hereby certifies that it intends to finalize all mailing of the enclosed updated Customer Notice no later than Friday, September 20, 2024 by written notice as authorized by 807 KAR 5:076 Section 5(2)(b)(2). Consistent with 807 KAR 5:076 Section 5(3)(a), Navitas will provide an affidavit from an authorized representative of the utility as promptly as possible upon the completion of the mailing, which will provide the Commission with the date of mailing.

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

Enclosure

³ E.g., Revised Attachment 1, at Page 5 of 9 (filed September 9, 2024), available at: https://psc.ky.gov/psccef/2024-00252/jill.wall%40dinsmore.com/09092024042906/ATTACHMENT_1_-_Customer_Notices.pdf

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
M. Evan Buckley