

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF NAVITAS KY)
NG, LLC FOR AN ALTERNATIVE RATE FILING) CASE NO. 2025-00332
PURSUANT TO 807 KAR 5:076)**

RESPONSE OF NAVITAS KY NG, LLC TO COMMISSION STAFF’S
POST-HEARING REQUEST FOR INFORMATION

Navitas KY NG, LLC (“Navitas”), by counsel, hereby files its responses to Commission Staff’s Post-Hearing Request for Information, issued in the above-captioned case on December 8, 2025.

FILED: December 12, 2025

RESPONSE OF NAVITAS KY NG, LLC TO COMMISSION STAFF'S
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REQUEST NO. 1-1: Provide an update on all past due accounts. Include in the response the current amount due and owing, the past due amount, and the length of each of the delinquencies.

RESPONSE: Please see attached Exhibit PHDR 1.

Witness: Carlos Gonzalez

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REQUEST NO 1-2: Provide an updated Statement of Adjusted Operations (SAO) to address the discrepancies between the expenses and revenues listed below and discussed in the December 5, 2025 hearing. Also update Navitas KY's SAO or 2024 Annual Report¹ to reconcile any inconsistencies between the two. Specifically, Navitas KY should address the following information:

- a. Miscellaneous Service Revenues. The 2024 Annual Report and SAO do not match as there is a difference of \$28,726.28;
- b. Other Gas Revenues is not included in the 2024 Annual Report;
- c. Natural Gas Production Expense is not included in the 2024 Annual Report;
- d. Distribution Expense. The 2024 Annual Report and SAO do not match as there is a difference of \$6,096.24;
- e. Customer Accounts Expense. The 2024 Annual Report and SAO do not match as there is a difference of \$53,022.31;
- f. Total Operating and Maintenance Expense is not included in the 2024 Annual Report; and
- g. Any other discrepancies noted by Navitas KY in comparing the SOA to the 2024 Annual Report.

¹ *The Annual Report of Navitas KY to the Public Service Commission for the Year Ending December 31, 2024* (2024 Annual Report).

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RESPONSE:

a. Miscellaneous Service Revenues includes \$28,726.28 of Interest Income that can be found on line 37 of page 21 of 131 in the 2024 Annual Report. It has been removed from the SAO to match the "Revenue from Sales at Present Rates" on the Revenue Requirement Calculation form. See Exhibit PHDR 2.

b. The \$1,290,471.71 amount of Line 2. Gas Operating Revenues (400) of Page 19 of 131 in the 2024 Annual Report reflects revenue accounts 414 · Other Utility Operating Income \$260,344.55, 480 · Customer Classes \$1,014,285.30, and 488 · Penalties & service charges \$15,841.86 from the 2024 Navitas KY NG, LLC Profit & Loss Report attached to the 2024 Annual Report.

c. As noted in reference #5 of the SAO, the Natural Gas Production Expenses line includes Gas Purchase Expenses reflected in the P&L report mentioned in (b) above under account 804. This expense was added here to match the \$1,595,100.09 from the Total Operation and Maintenance Expenses on the SAO and the sum of lines 4 and 5 column (g) of page 19 of 131 in the 2024 Annual Report.

d. The Distribution Expense line in the SAO reflects expenses in account 874 and 887 from the P&L report mention in (b) above. This expense is reflected in the sum of lines 4 and 5 column (g) of page 19 of 131 in the 2024 Annual Report.

e. The Customer Accounts Expense line in the SAO reflects expenses in account 903 and 904 from the P&L report mention in (b) above. This expense is reflected in the sum of lines 4 and 5 column (g) of page 19 of 131 in the 2024 Annual Report.

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f. Total Operating and Maintenance Expenses can be found in lines 4 and 5 column (g) of page 19 of 131 in the 2024 Annual Report. Consequently, this is confirmed on line 1 of the Checklist on page 128 of 131 in the 2024 Annual Report. The total amount of the O&M Expenses is the sum of accounts 804, 874, 887, 903, 908, 909, 920, 921, 923, 924, 925, 926, 928, 931, and 932 from the P&L report mention in (b) above.

g. Navitas has not found any other discrepancies between the SAO and the 2024 Annual Report. The "Total Operating Expenses" for the "Test Year" column on the SAO equal equals line 25 column (g) of page 20 of 131 in the 2024 Annual Report.

Witness: Carlos Gonzalez

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REQUEST NO. 1-3: Provide an organizational chart including all companies mentioned in the Cost Allocation Manual as well as all “client companies” referenced on page 2.

RESPONSE: Please see attached Exhibit PHDR 3.

Witness: Thomas Hartline

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REQUEST NO. 1-4: Provide a cost justification sheet for the nonrecurring charge listed in Navitas KY's tariff, "Remote Index Installation Charge."

RESPONSE: Please see attached Exhibit PHDR 4.

Witness: Carlos Gonzalez

RESPONSE OF NAVITAS KY NG, LLC TO COMMISSION STAFF'S
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REQUEST NO. 1-5: Refer to Navitas KY's response to Commission Staff's First Request for Information (Staff's First Request), Item 6. Explain what Navitas KY charges the Keystone customer.

RESPONSE: In accordance with the contract, the customer in question is required to take 3,000 MCF per month charged at \$3.62 per MCF plus Customer Charge of \$75 (the normal Clinton County large Commercial tariff), GCA (at rate in effect), and applicable taxes.

The customer's amount due is then reduced by half the flow tariff amount (# of MCF x \$1.81). The amount of the reduction in amount due is offset by a reduction in the prepayment balance.

In the event that the customer has not used 3,000 MCF, they must pay \$10,860 plus \$75, plus the actual GCA amount (# x rate in effect), and applicable taxes. The minimum amount, in excess of the normal flow tariff calculation, is added to the prepayment balance.

For example, in the month that the plant has an outage and take no gas their minimum payment will be \$10,935 plus applicable taxes. Of this amount \$10,860 will be added to the customer's prepayment balance to be refunded at a later date as shown above.

Witness: Thomas Hartline

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REQUEST NO: 1-6: Refer to Navitas KY's response to Staff's First Request, Item 17.

The entirety of the response was unresponsive. For clarity purposes, respond to all subparts separately. For the test year, provide the number of new taps installed in the test year.

RESPONSE: Based on the follow-up data requests 6., 7., and 8., my interpretation of 'taps', which I understand to be where gas enters our system, was incorrect. Rather, by 'taps' the question was referring to new customer services. For clarity, the answers in 6., 7., and 8., will refer to new-to-Navitas services, thus some of the services are newly installed by Navitas personnel and some of the services are newly acquired by Navitas, but previously installed by others. These answers do not refer to new customers at a previously existing Navitas service.

There were 23 newly installed or acquired services in 2024, which breakdown as follows: Clinton County 11 (all newly installed), Eastern Kentucky 12 (all the acquired services were in EKY).

Witness: Thomas Hartline

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REQUEST NO. 1-7: Refer to Navitas KY's response to Staff's First Request, Item 17.

The entirety of the response was unresponsive. For clarity purposes, respond to all subparts separately. If new taps were installed, explain whether the labor expenses associated with the installation of the new tap were capitalized and if so, provide the amount.

RESPONSE: Please see the attached Exhibit PHDR 7 detailing the capitalization. For the 23 new services either installed or acquired, Navitas capitalized \$5,500 in labor associated with its own forces and concurrently reduced direct cost expense by the same amount.

Witness: Thomas Hartline

RESPONSE OF NAVITAS KY NG, LLC TO COMMISSION STAFF'S
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REQUEST NO. 1-8: Refer to Navitas KY's response to Staff's First Request, Item 17.

The entirety of the response was unresponsive. For clarity purposes, respond to all subparts separately. If new taps were installed, explain whether the materials expense associated with the new tap were capitalized and if so, provide the amount.

RESPONSE: Please see the attached Exhibit PHDR 8 detailing the capitalization. For the 23 new services either installed or acquired, Navitas capitalized \$4,372.74 in materials from the inventory of the operator.

Witness: Thomas Hartline

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REQUEST NO. 1-9: Refer to Navitas KY's response to Staff's First Request, Item 14.

Provide the operating agreement referenced in that response.

RESPONSE: Please see attached Exhibit PHDR 9.

Witness: Thomas Hartline

RESPONSE OF NAVITAS KY NG, LLC TO COMMISSION STAFF'S
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REQUEST NO. 1-10: Refer to the General Ledger, parts 1 and 2.

- a. Explain why there are accounting entries for an agricultural customer class.
- b. Provide the rates and charges Navitas KY has been charging to the agricultural customer class.

RESPONSE:

a. Navitas KY NG has a group of customers consisting of chicken grow houses. Given the dramatically different usage pattern (sporadic very high usage for a very short time) versus regular Commercial customers (with usage patterns more comparable to residential customers), Navitas created a Commercial subdivision labeled Agriculture. This was done for two reasons, 1) it is anticipated that this data will be needed separately to effect a cost of service study, and 2) in certain jurisdictions these types of customers are afforded preferential tax status.

b. Navitas KYNG charges these customers (who are exclusive to Clinton County) the regular Commercial tariff applicable to Clinton County.

Witness: Thomas Hartline

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REQUEST NO. 1-11: Refer to the Hearing Testimony of Thomas Hartline (Hartline Hearing Testimony). Confirm that customers wishing to make in-person payments in Kentucky are able to pay at a bank, provide the name of the bank, and the address. If not confirmed, explain how customers can make in-person payments in Kentucky.

RESPONSE: Since the destruction of the Navitas office by arson fire, Navitas has been unable to accept payments in person at an office. Subsequently in July 2022 Community Trust Bank discontinued their service of accepting customer payments in person. Navitas has not had resources available to research and reestablish a local bank payment option.

In some limited circumstances, Navitas has been known to allow the field service person to accept personal checks (at their discretion) during the establishment of new services, with the field service person mailing these checks to the Eakly, OK office. Navitas does not have a bank in Kentucky which accepts payments directly from customers (it does have this service available in Jellico, TN and in select locations in Oklahoma, reflective of the uncertainty in the hearing testimony of Mr. Hartline).

Witness: Thomas Hartline

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REQUEST 1-12: Refer to Hartline Hearing Testimony. Provide the jobs sheets for all employees who did work in Kentucky in 2023, 2024, and 2025 year to date.

RESPONSE: The job sheets for 2023 are attached as Exhibit PHDR 12-1, for 2024 as Exhibit PHDR 12-2, and for 2025 as Exhibit PHDR 12-3, 12-4, 12-5, and 12-6. Please note that these jobs only include the jobs completed by employees as requested, no jobs done by contractors are included.

Witness: Carlos Gonzalez

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REQUEST NO. 1-13: Refer to Hartline Hearing Testimony. Explain the account where expenses from gas suppliers would be recorded. Confirm that it is an 800 account.

RESPONSE: Expenses from gas suppliers are recorded in account 804 · City Gate Purchases on Navitas KY NG, LLC's General Ledger.

Witness: Carlos Gonzalez

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REQUEST NO. 1-14: Refer to Hartline Hearing Testimony.

- a. Provide a list of all outstanding debts owed in relation to the operations of Navitas KY.
- b. Explain how Navitas KY prioritizes which debts to pay first.
- c. Provide a payment plan for how Navitas KY anticipates getting current on all of its current debts, overdue bills, or other financial obligations.

RESPONSE:

- a. Navitas KY NG has three system notes as well as a line of credit:

Identifier	Original Amount	Balance 6/30/25	Payment	Priority
0645	\$300,000	\$192,675	\$2,815	2
3681	\$1,600,000	\$1,003,897	\$14,805	4
6945	\$660,000	\$586,390	\$4,815	3
LOC	\$350,000	\$275,000	\$2,500 (varies)	1

- b. Our payment methodology monthly is as follows:
 - a. Make Payrolls
 - b. Pay Insurances including healthcare, general liability, and auto
 - c. Pay very small invoices typically clearing out invoices less than \$1000
(though this amount may decline towards the end of the year)
 - d. Pay all utility bills and Pitney Bowes (postage), often this occurs with
 - c.

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- e. Pay all gasoline vendors
 - f. Pay lines of credit
 - g. Pay small businesses not captured by c.
 - h. Pay material suppliers some amount (varies depending on time of year)
 - i. Make debt payments
 - j. Pay transporters
 - k. Pay Attorneys
 - l. Note – Gas suppliers are paid as often as weekly with amounts varying by month
- c. In 2021 Navitas expanded operations in Kentucky as well as in another jurisdiction. At that time it fully expected that further economies of scale would develop from this significant increase in customers. However, in mid-2022 Navitas recognized that, due to significant inflation and interest rate increases, it would need to initiate rate cases in its various jurisdictions. In 2023 it executed a rate case in its largest jurisdiction using a test case year 2022; the rates from this case were phased in in April 2024 (quite unfortunately missing winter) and January 2025. Navitas then initiated its first ever rate case in Kentucky (its 2nd largest jurisdiction) in 2024 using test case year 2023. Its plan was to then implement a rate case in Tennessee in 2025 using a 2024 test case year. Given the necessity to refile the rate case in Kentucky, the Tennessee rate case has been delayed until 2026, and then Navitas will initiate another rate case in Oklahoma in 2027 using the 2026 test case year.

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In addition to these rates cases, Navitas is implementing a plan to recover gas costs that were stranded due to suspended GCA filings in Kentucky. This recovery of some hundreds of thousands of dollars will occur over a number of years, primarily in 2027 and 2028.

Thus, it is anticipated that Navitas will continue slowly work its way through its obligations over the course of quite a number of years. Though not at this scale, Navitas experienced a similar situation in the years after 2012, a year in which there was an extremely mild winter in its largest jurisdiction. It took a number of years to recover from that anomalous weather.

Witness: Thomas Hartline

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REQUEST NO 1-15: Refer to Hartline Hearing Testimony.

a. Provide the amount currently owed to each gas supplier. In the response, include the full name of each entity.

b. Provide the amount currently owed to each gas transporter. In the response, include the full name of each entity.

c. Provide the current amount, if any, Navitas KY owes to Navitas Utilities Corporation.

RESPONSE:

a. Please see below.

Gas Suppliers (15.a.)	Balances recorded as of DEC 8, 2025
Diversified Energy Marketing, LLC [EKY]	\$24,281
Petrol Energy, LLC [KY]	\$332,453
Sparta Energy [Clinton County]	\$81,372

b. Please see below.

Gas Transporters (15.b.)	Balances recorded as of DEC 8, 2025
B&W Pipeline [Clinton County]	\$115,229
East Tennessee Natural Gas, LLC [Clinton Co]	\$0

c. Navitas KY NG, LLC owes Navitas Utility Corporation \$2,302,949.20 as of December 10, 2025.

Witness: Carlos Gonzalez

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REQUEST NO. 1-16: Refer to Hartline Hearing Testimony. Provide the late payment fees included in the revenue requirement.

RESPONSE: \$15,012.35 of late payment fees were included as part of the 'Revenue from Sales at Present Rates' line of the Revenue Requirement Calculation form.

Witness: Carlos Gonzalez

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REQUEST NO. 1-17: Refer to Hartline Hearing Testimony. Refer also to Responses to Information Requested in Informal Conference Order, Attachment IC(a) 2025_KYNG_Cashflow.xlsx.

a. Provide this spreadsheet for monthly 2025 Navitas KY NG, LLC pro forma cash flow. In this spreadsheet provide whether an expense is directly assigned or allocated; the allocation factor for each expense; the percentage allocated from Navitas Utility Corporation to Navitas KY; and a breakdown of what is included in each expense; whether the expense is paid quarterly, monthly or annually. For example, for direct costs in line 8, Navitas KY should provide a breakdown of all expenses associated with this line item and then provide the requested information for each individual expense.

b. Provide a narrative description for each expense located in this spreadsheet.

RESPONSE: Please see attached Exhibit PHDR 17.

Witness: Carlos Gonzalez

RESPONSE OF NAVITAS KY NG, LLC TO COMMISSION STAFF'S
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REQUEST NO. 1-18: Confirm that any gas costs recovered through the Gas Cost Recovery (GCR) are not being requested in the revenue requirement in this case.

RESPONSE: Confirmed. Any gas costs recovered through the GCR are not being requested in the Revenue Requirement for Case No. 2025-00332.

Witness: Carlos Gonzalez

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REQUEST NO. 1-19: Refer to the Navitas KY Tariff – Nonrecurring Charge for Insufficient Funds – Check - \$15.00 (Original Sheet 3) and refer to the excel provided in response to PSC 1-3. Reconcile the number of occurrences with the tariff amount and the amount collected.

RESPONSE: It appears Navitas KY has inadvertently charged the wrong amount for the Insufficient Funds Check Fee per occurrence. We are looking into the matter and will supplement this response.

Witness: Carlos Gonzalez

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REQUEST NO. 1-20: Refer to the cost allocation manual (CAM) and then the response to Staff's First Request, Item 11. Item 11 references account 700 but there is no reference to such an account in the CAM. Explain how the salaries are to be allocated.

RESPONSE: Item 11 of Staff's First Request made no mention to include allocation methodology of employee salaries. Item 11 makes no reference to FERC account 700. The spreadsheets provided in Item 11 may have included a "Grand Totals" tab that should be disregarded as the work tab was mistakenly not removed from the spreadsheets provided due to the rush nature of the time allocated to respond to Staff's First Request. The "Grand Totals" tab does make a reference to "Department: 700 – Kentucky" which is an internal payroll department for NUC, not a reference to FER account 700.

Employee salaries are allocated and billed from NUC to the LDC depending on the nature of the position. Positions directly associated with a specific LDC are allocated and billed directly to the LDC, i.e. Field Service KY is directly allocated to account 874 and 100% billed to Navitas KY NG, LLC. Positions that are shared with all LDCs are allocated to the account associated with the function of the position and then billed to all LDCs based on the percentage of allocation calculated for the year, i.e. Customer Service All is allocated to account 908 and 19.68% billed to Navitas KY NG, LLC in 2024 and 19.07% billed in 2025.

Witness: Carlos Gonzalez

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REQUEST NO. 1-21: Confirm that Navitas KY would not use any awarded emergency rate increase to pay its gas supplier Clearwater Enterprises. If not confirmed, explain why.

RESPONSE: Confirmed. Under the emergency rates and the phased in tariffs requested in its Alternative Rate Filing, Navitas KYNG, LLC does not anticipate recognizing an accounting profit, which could be invested in a sibling by the parent, for numerous years. More specifically, under the emergency tariffs requested during the pendency of the case, Navitas KYNG will continue to operate at a cash loss. It follows that, to the extent the emergency tariffs reduce the deficit run by Navitas KYNG this reduces the transfer funding from other jurisdictions necessary to make up the cash loss and thus does allow for additional payments to Clearwater Enterprises. Most importantly, given that Clearwater is the single largest vendor to the operator, it effectively has the primary power to request placement of the Navitas companies et al into receivership. As such, the stakeholders of the Navitas Kentucky systems have a keen interest in maintaining a healthy ancillary relationship with Clearwater Enterprises.

Witness: Thomas Hartline

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REQUEST NO. 1-22: If an Order is issued on or before December 31, 2025, granting an emergency increase, explain when Navitas KY would place the rates into effect and begin billing those rates to its customers. For an example, assume the Commission approved a new rate with an effective date of January 1, 2026. Explain if Navitas KY applies the Commission approved rate to customer billings received on or around January 1, 2026, or if Navitas KY applies the Commission approved rate to customer usage metered on and after January 1, 2026.

RESPONSE: It is our understanding that, whereas some jurisdictions allow tariffs put in place off cycle to be charged for the entire billing period, the Kentucky Public Service Commission does not allow 'partially retroactive' tariffs and expects new rates to be applied only for service actually rendered on or after the date the new rates are approved. Thus, under the scenario of an order on the emergency tariffs being issued subsequent to December 7th (the 7th of the month is the billing date in our tariff) but before January 7th, the first billing under the emergency tariffs will be February 7th.

Witness: Thomas Hartline

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REQUEST NO. 1-23: Confirm whether all rates and charges included in Navitas KY's current tariff on file with the Commission include the correct rates and charges being billed to Navitas KY customers.

RESPONSE: With the exception of the returned check charge discussed in Item 1-19, Navitas KY NG, LLC believes that the correct rates and charges are being billed to the customers of the systems, as reflected in the tariff.

Witness: Thomas Hartline

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REQUEST NO. 1-24: Provide an update on the status of the cost of service study (COSS).

RESPONSE: Scott Madden has been retained to complete a COSS for Navitas KY NG, LLC. Data and documentation have been submitted to Scott Madden and they have begun work on the COSS. We are programmed to schedule a conference call with the team at Scott Madden for December 15th through the 19th to discuss the progress of the COSS and to clarify dates for the completion of progress markers, drafts and final submissions of the COSS.

Witness: Carlos Gonzalez

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REQUEST NO. 1-25: Explain whether Navitas Utility Corporation has considered selling Navitas KY. If yes, provide the general nature of these conversations.

RESPONSE: Historically, Navitas is a buyer, not a seller. Moreover, the philosophy of the owners is one of operation with an outlook beyond their lifespan. It is unlikely that Navitas would sell any single piece of its holdings (though it would consider a trade that increased operational economies). Navitas has pursued joint ventures (to wit, the Navitas-WinStar system with the Chickasaw Nation). Navitas is contacted multiple times per week by unqualified buyers and some years ago it was approached by a multi-national as an entry point into the United States with an overture that did not fit the timing of the principles.

Witness: Thomas Hartline

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REQUEST 1-26: Explain why Navitas KY chose to use the operating ratio method instead of the debt service method.

RESPONSE: There are two reasons that Navitas did not use a debt service methodology (note that debt service coverage was part of the analysis by an expert called by another jurisdiction). First, Navitas understood that only the operating ratio method is available under the Alternative Rate Filing. Second, a debt service coverage methodology will result in an even greater revenue requirement. Current monthly debt service in Kentucky is \$22,435 plus interest on the line of credit, thus it approached \$300,000 annually. With the application of a standard debt service coverage ratio multiple, the resultant figure will exceed the interest plus allowable net income figure of \$335,010 in the ARF Revenue Requirement Calculation.

Witness: Thomas Hartline

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REQUEST NO. 1-27: Confirm that the following expenses were not included in the revenue requirement and provide the amounts that were adjusted out:

- a. Late fees;
- b. Interest expenses; and
- c. Overdraft fees.

RESPONSE:

a. Any late fees assessed by banks or financial institutions for loans are not recognized by Navitas and do not reflect in the Operating Financial reports. If these fees have been assessed, they are usually negotiated off or down with the various banks to reduce any and all expenses by Navitas and continue a working partnership. Any late fees charged by gas suppliers are never included in the GCA and left out of the Operating Financial reports. It is possible de minimis late fees associated with overhead expenses such as utilities may be reflected in the Operating Financial reports, but these are typically very small and Navitas makes it a point to pay on time.

b. Interest Expenses are included in the Revenue Requirement under line 7 "Add: Interest Expense" of the REVENUE REQUIREMENT CALCULATION - OPERATING RATIO METHOD form provided by the KY PSC. See Attachment 5 of the Application for Case 2025-00332.

c. Bank7 does not charge us Overdraft fees, but in the event such a fee is charged, it is reversed by the bank and not reflected in our Operating Financial reports.

Witness: Carlos Gonzalez

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REQUEST NO. 1-28: Refer to the Navitas KY GCR rate report² from Case No. 2025-00316,³ tab labeled “Sales”, the Combined Monthly Customer Sales for 2025, columns F through R, row 59. Also, refer to Case No 2025-00316, the file titled “Billing Edits Lists”.⁴

a. Explain how the sales values shown in the Billing Edits List correspond to the sales as reported in the GCR rate report sales tab.

b. Provide the unit of measurement for the sales amount in the Billing Edits List.

c. Provide the monthly Billing Edits Lists sheets beginning with 2023 through July 2025.

Be sure to clearly mark the period the usage is being reported.

RESPONSE:

a. To calculate the sales volume from the Billing Edit List: in the ‘Billed Usage’ column, sum the figures labeled ‘[class] PGA’ for each class (Residential, Commercial, Industrial, Agriculture Heat).

b. The figure in a. is in units of CCF. To convert CCF to MCF divide by 10.

c. Navitas KY routinely files these Billing Edits Lists as part of its GCR filings, and thus reference is made to those filings. That said, Navitas intends to supplement this response with the compiled documentation (it does not provide it now due to time constraints in responding to this request for information).

Witness: Thomas Hartline

² Navitas KY’s Responses to Information Requested in Informal Conference Order (filed Oct. 27, 2025), IC(f)_Navitas_PGA_-_Case_No._2025-00316.xlsx.

³ Case No. 2025-00316, Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC (filed Sept. 30, 2025), PGA.

⁴ Case No. 2025-00316, (filed Sept. 30, 2025), Case_No_2025-00316_-_Billing_Edits_List.pdf.

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REQUEST 1-29: Refer to the Navitas KY GCR rate report⁵ from Case No. 2025-00316,⁶ tab labeled “Sales”, the Combined Customer Sales for 2024, column AD, row 58, the 2024 total sales is reported as 71,724 Mcf. Also, refer to the 2024 Annual Report, page 5, the 2024 total sales is reported as 84,357 Mcf. Explain the reason for the discrepancies between the reported 2024 total sales.

RESPONSE: Navitas continues to evaluate this inquiry and will supplement this response.

Witness: Thomas Hartline

⁵ Navitas KY's Responses to Information Requested in Informal Conference Order, IC(f) -
_Navitas_PGA_-_Case_No._2025-00316

⁶ Case No. 2025-00316, (filed Sept. 30, 2025), Navitas_PGA_-_Case_No._2025-00316.xlsx.