



fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for their failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Navitas shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide electronic versions of option 1 and option 2 of Navitas's Gas Cost Recovery (GCR) report containing the supporting calculations used to compute the GCR in Excel spreadsheet format with all formulas intact and unprotected, and with all columns and rows accessible.

2. Refer to the Cover Letter filed by Navitas.
  - a. Explain in detail why Navitas is modifying the calculation of its GCR rate.
  - b. Explain what the TRA abbreviation stands for.
  - c. State why Navitas believes the TRA flow rate is the correct calculation to use in its GCR report instead of the FERC flow rate.

3. Provide a copy of the supporting documentation for the TRA flow rate. Explain why the TRA flow rate is applicable to the calculation of Navitas's quarterly gas cost recovery rate.

4. Refer to Navitas's GCR report, Option 1, Schedule 2, Expected Gas Cost (EGC) calculation sheet.

a. Explain in detail how the TRA flow rate affects the calculation of Navitas's EGC.

b. Explain what the B&W flow column is representing and how the values in the column were calculated.

5. Refer to Navitas's GCR report, Option 1, Schedule 4, Actual Adjustment (AA) calculation sheet.

a. Explain in detail how the TRA flow rate affects the calculation of Navitas's AA.

6. Provide a copy of the supporting documentation for the FERC flow rate. Explain why the FERC flow rate is applicable to the calculation of Navitas's quarterly gas cost recovery rate.

7. Refer to Navitas's GCR report, Option 2, Schedule 2, EGC calculation sheet.

a. Explain in detail how the FERC flow rate affects the calculation of Navitas's EGC.

b. State why the B&W pipeline column was left blank.

c. Explain what the B&W flow column is representing and how the values in the column were calculated.

8. Refer to Navitas's GCR report, Option 2, Schedule 4, AA calculation sheet.

a. Explain in detail how the FERC flow rate affects the calculation of Navitas's AA.

9. Refer to the B&W pipeline referenced throughout Navitas's GCR report.
  - a. Explain how Navitas utilizes the B&W pipeline.
  - b. Explain how the transportation cost associated with the B&W pipeline is determined.
  - c. Explain how the TRA flow rate and FERC flow rate is applicable to the B&W pipeline as used by Navitas.



Gwen R. Pinson  
Executive Director  
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DATED           JUL 10 2019          

cc: Parties of Record

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