

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PURCHASED GAS ADJUSTMENT FILING OF) CASE NO.
NAVITAS KY NG, LLC) 2019-00372

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NAVITAS KY NG, LLC

Navitas KY NG, LLC (Navitas), pursuant to 807 KAR 5:001, is to file with the Commission the original and three copies in paper medium of the following information, with copies to all parties of record. The information requested herein is due on October 18, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Navitas shall make timely amendment to any prior response if they obtain information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Navitas

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. State whether Navitas used the Federal Energy Regulatory Commission (FERC) approved rate or the Tennessee Public Utility Commission, formerly known as the Tennessee Regulatory Authority (TRA) approved flow rate, established in Case No. 2019-00241,¹ in the calculation of its Gas Cost Recovery (GCR) report for rates effective November 1, 2019.

2. Provide a version of Navitas's GCR report utilizing the unused rate mentioned above in the calculation of its GCR report for rates effective November 1, 2019.

3. Provide electronic versions of both GCR reports using the FERC approved rate and the TRA approved rate in the calculation of its GCR reports for rates effective November 1, 2019. The information should contain 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.

¹ Case No. 2019-00241, *Purchased Gas Adjustment Filing of Navitas KY Ng, LLC* (Ky. PSC July 8, 2019).



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
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DATED OCT 09 2019

cc: Parties of Record

Case No. 2019-00372

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