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Navitas Utility Corporation
3186D Airway Avenue
Costa Mesa, CA 92626
Phone: 714.242.4064
Email: thartline@navitasutility.com

December 11, 2019

VIA U.S. MAIL

Gwen Pinson
Executive Director
Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

RE: Navitas KY NG, LLC's Motion Requesting Extension of Time

Dear Executive Director Pinson,

Enclosed for filing Navitas KY NG, LLC's Motion Requesting an Extension of Time to respond to the Commission's December 9, 2019 Order. If you have any questions about this filing, please contact me at 615.594.4377. Thank you.

Yours truly,



Klint W. Alexander
615.594-4377

Klint.alexander10@gmail.com

cc: Thomas Hartline

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PUBLIC SERVICE
COMMISSION

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**NAVITAS KY NG, LLC'S APPLICATION FOR) CASE NO. 2019-00430
ALTERNATIVE RATE ADJUSTMENT)**

MOTION REQUESTING AN EXTENSION OF TIME

COMES NOW Navitas KY NG, LLC ("Navitas"), by and through undersigned counsel, and hereby submits this Motion Requesting an Extension of Time (an additional 20 days) to submit a response to the Commission's request for additional documentation pursuant to the Commission's Order entered December 9, 2019.

In support of this Motion, Navitas would show unto the Commission as follows:

1. The Commission has jurisdiction over this matter pursuant to KRS 278.010 *et seq.*, 807 KAR 5:076 *et seq.*

2. Navitas was ordered to produce additional documentation in response to the Commission's December 9, 2019 Order within 20 days, including but not limited to the following:

- evidence of the amounts due and owing B&W Pipeline, LLC for retroactive interstate gas transportation costs, including bills it received from B&W for gas transportation costs between July 17, 2017 and January 31, 2019.

- notice to customers that comports with filing requirements . . . by setting forth with clarity the current and proposed rates, and amount of change in dollar amount and percentage change.

3. Navitas has not received revised bills from B&W reflecting pro rate adjustments for amounts already paid by customers and is unlikely to receive this information from B&W on

or by December 29, 2019 during the holidays. These revised bills are necessary to accurately calculate the arrearage amount at issue in this proceeding with specificity, and, therefore, will require additional time to prepare the required information for the Commission's review.

4. Navitas, too, is closed for the holidays and will be unable to submit all of the documentation requested by the Commission on or by December 29, 2019. Accordingly, Navitas will need an additional 20 days to obtain the requested documentation from B&W and prepare the documentation for timely submission in response to the Commission's December 9, 2019 Order.

WHEREFORE, Navitas KY NG, LLC respectfully requests the Commission to issue an Order:

1. Approving Navitas' request for a 20 day extension of time to January 18, 2020 to enable Navitas' to comply with the Commission's December 9, 2019 Order and satisfy the initial filing requirements for its Application for an Alternative Rate Adjustment as determined by the Commission pursuant to 807 KAR 5:076 *et seq.*; and

2. Granting such other relief as the Commission may determine to be fair, just and equitable in the premises.

Dated this 11th day of December, 2019.

Respectfully submitted,



Klint W. Alexander (#88343)
Counsel for Navitas KY NG, LLC
1767 Nottage Ct
Laramie, WY 82072
(615) 594-4377
klint.alexander10@gmail.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of December, 2019, a true and correct copy of the foregoing instrument was deposited in the United States Mail with postage prepaid, and addressed to the following:

Gwen Pinson

Executive Director
Public Service Commission
Commonwealth of Kentucky
211 Sower Blvd.
Frankfort, KY 40601

Larry Cook

Office of the Attorney General
Rate Intervention
700 Capitol Ave. Suite 20
Frankfort, KY 40601



Klint W. Alexander