

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC PURCHASED GAS ADJUSTMENT)	CASE NO.
FILING OF NAVITAS KY NG, LLC)	2023-00428

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

Navitas KY NG, LLC (Navitas KY), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on January 29, 2024. The Commission directs Navitas KY to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

Navitas KY shall make timely amendment to any prior response if Navitas KY obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Navitas KY fails or refuses to furnish all or part of the requested information, Navitas KY shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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 KY shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Commission's final Order in Case No. 2023-00325, ordering paragraph 2.²

a. Provide all supplier invoices received by Navitas KY for the reporting period of 24-months ended October 31, 2023.

² Case No. 2023-00325, *Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC* (Ky. PSC Oct. 30, 2023), at 3, ordering paragraph 2, required Navitas KY to submit all invoices it receives along with its monthly usage reports for each month of the reporting period when it files future Gas Cost Recovery (GCR) rate reports.

b. Explain why Navitas KY failed to provide the necessary supplier invoices required by the Commission when it filed its current GCR rate report.

2. Refer to Navitas KY's GCR rate report, the file labeled: "KY_GCA_231231_-_23-00428_to_be_filed.xlsx", tab labeled: "EGC (SII)". For each cell with just a numeral value, that does not include a formula, provide an explanation for how that value was determined and provide the justification for that cell value.

3. Refer to Navitas KY's GCR rate report, the file labeled: "KY_GCA_231231_-_23-00428_to_be_filed.xlsx", tab labeled: "EGC (SII)". Also, refer to column J, row 6. In regards to the cell for the "rate" for the supplier named "Petrol".

a. Provide the justification for the 11.4999 rate.

b. Explain why Navitas KY did not provide justification or an explanation for how the rate was determined.

4. Refer to Navitas KY's GCR rate report, the file labeled: "KY_GCA_231231_-_23-00428_to_be_filed.xlsx", tab labeled: "EGC (SII)". Also, refer to column J, row 7. In regards to the cell for the "rate" for the supplier named "Sparta".

a. Provide the justification for why 9.4999 rate is the rate for Petrol minus two.

b. Explain why Navitas KY did not provide justification or an explanation for how the rate was determined.

5. Refer to Navitas KY's GCR rate report, the file labeled: "KY_GCA_231231_-_23-00428_to_be_filed.xlsx", tab labeled: "EGC (SII)". Also, refer to column N, row 16 and row 23. Explain why the rate for the supplier name "Diversified Gas & Oil" is noted as being estimated based on Sparta.

6. Refer to Navitas KY's GCR rate report, the file labeled: "KY_GCA_231231_-
_23-00428_to_be_filed.xlsx", tab labeled: "Actual Adjustment (IV)". Also, refer to columns
BC through BG, and rows 54 through 57. Explain the purpose of this section and why it
was included in the calculation of the current quarter Actual Adjustment component.



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DATED JAN 22 2024

cc: Parties of Record

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