

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NAVITAS KY	)	CASE NO.
NG, LLC FOR AN ALTERNATIVE RATE FILING	)	2024-00252
PURSUANT TO 807 KAR 5:076	)	

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

Navitas KY NG, LLC (Navitas), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on December 26, 2024. The Commission directs Navitas to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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

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<sup>1</sup> 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).

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 Navitas 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 fails or refuses to furnish all or part of the requested information, Navitas 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 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 Application, Attachment 1, Customer Notices.
  - a. Based on the present rates and the average usage as provided in the Customer Notice, provide the average monthly bill for each of the proposed customer classifications.

b. Based on the proposed rates and the average usage as provided in the Customer Notice, provide the average monthly bill for each proposed customer classifications to which the proposed rates will apply for each of the proposed phases.

2. Refer to the Application, Attachment 9, the Statement of Disclosure of Related Party Transactions. Explain why Navitas provides rent payments for 2022-2023 to both the related parties of “Fort Cobb Fuel Authority LLC” and “Navitas Assets, LLC.” Provide documented proof or supplemental documentation to support the response.

3. Refer to Navitas’s response to Commission Staff’s First Request for Information (Staff’s First Request), Item 23a.

a. Explain, in detail, the steps in the process for new customers requesting service from Navitas beginning with the initial request and ending with the beginning of service to the requested location.

b. Explain how Navitas determines the customer classification for new customers requesting service.

4. Refer to Navitas’s Response to Staff’s First Request, Item 23b, Exhibit PSC 1-23(b), Page 8 of 31, regarding the section titled “Applicability”. Explain if Navitas uses a standard Agreement for Gas Service form for its customers.

a. If so, provide the standard Agreement for Gas Service form.

b. If not, explain why Navitas does not have a standard Agreement for Gas Service form.

5. Refer to Navitas’s Response to Staff’s First Request, Item 23b, Exhibit PSC 1-23(b), page 8 of 31, regarding the section titled “Customer Inquiries.”

a. Explain if Navitas maintains any local offices located in Kentucky. If so, identify the location of those local offices.

b. Explain how Navitas typically performs the following: meter reading, maintenance, and addresses emergency issues.

c. Explain if Navitas utilizes contract labor to perform meter reading and other emergency services within the service territory of Kentucky. If not, explain how the labor is compensated when those tasks are required.

6. Refer to Navitas's Response to Staff's First Request, Item 23c. Explain whether the meters used by Navitas are read in thousand cubic feet (Mcf) or hundred cubic feet (Ccf).

7. Refer to Navitas's Response to Staff's First Request, Item 23c. Also, refer to Navitas's Response to Staff's First Request, Item 23(b), Exhibit PSC 1-23(b), page 31 of 31. Explain if Navitas's proposed change in billing and rate design would result in a change to the billing sample in Navitas's Tariff. If so, provide an update to the billing sample that would reflect the change in the proposed rate design.

8. Refer to Navitas's Response to Staff's First Request, Item 29. Provide an expanded response to the previous request of Staff's First Request, Item 29, by providing the following information:

- a. A general description of each project;
- b. A timeline of project start date to project completion date;
- c. If applicable; a projected project completion date;
- d. If applicable; overall associated project costs; and generalized location for each project; and

e. If Navitas cannot provide any of the listed information in this item, explain why it is not able to fully respond to the request.

9. Refer to Navitas's Response to Staff's First Request, Item 31a. Provide the annual line loss for each year beginning in 2020 to the present as calculated for 2024 as of the date of this request, on a jurisdiction-wide basis for Kentucky.

10. Refer to Navitas's Response to Staff's First Request, Item 44. Provide the Bill Edits for the year 2023 by the monthly reports, as referenced in the response.

11. Refer to Navitas's response to Staff's First Request, Item 46, pages 3 and 4 of 6, the chart indicating the difference in meter size for each proposed customer classification.

a. Provide a breakdown of the type of the natural gas meters used (i.e., Diaphragm meter, Ultrasonic meter, Rotary meter, and/or Turbine meter), meter cost, annual maintenance requirements, the specifications of the meters typically used for the Residential customer classification.

b. Provide a breakdown of the type of the natural gas meters used (i.e., Diaphragm meter, Ultrasonic meter, Rotary meter, and/or Turbine meter), meter cost, annual maintenance requirements, the specifications of the meters typically used for the Commercial customer classification.

c. Provide a breakdown of the type of the natural gas meters used (i.e., Diaphragm meter, Ultrasonic meter, Rotary meter, and/or Turbine meter), meter cost, annual maintenance requirements, the specifications of the meters typically used for the Industrial customer classification.

d. Provide a breakdown of the type of the natural gas meters used (i.e., Diaphragm meter, Ultrasonic meter, Rotary meter, and/or Turbine meter), meter cost, annual maintenance requirements, the specifications of the meters typically used for the Agricultural customer classification.

12. Refer to Navitas's response to Staff's First Request, Item 42. Also refer to Navitas's response to Commission Staff's Second Request for Information (Staff's Second Request), Item 3d. The response to Item 42 as referenced in Item 3d states:

[...] (\$222,737) in 414 – Other Utility Operating Income. 414 – Other Utility Operating Income consists of adjustments to the amounts charged for Past Gas Cost Adjustment (GCA) to B&H and Johnson County Gas customers, pursuant to the Final Order issued in Case No. 2020-00396 on April 28, 2021, and the normal quarterly adjustments for Over and Under-collections for the GCA. Navitas considers the adjustments and charges to be representative of future Other Revenues to be collected, though the amounts will vary quarter to quarter due to the fluctuation of the GCA and customer behavior for penalties and service charges.

a. State whether a portion of the (\$222,737) consists of amounts yet to be recovered from Bud Rife to compensate Navitas for refunds Navitas made to customers on behalf of the former B&H and Johnson County Gas companies as ordered by the Commission in Case No. 2020-00396.<sup>2</sup> If so, provide the amounts in 414 – Other Utility Operating related to each of the former companies for this purpose, and explain why it is appropriate for these amounts to be included in Navitas's revenue requirement. If not, explain the amounts referenced in the response.

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<sup>2</sup> Case No. 2020-00396, *Electronic Application of Navitas Ky Ng, Johnson County Gas Company, and B & H Gas Company for Approval of Acquisition, Transfer of Ownership, and Control of Natural Gas Utility Systems*, (Ky. PSC Apr. 27, 2021), at 22, Ordering Paragraph 9.

b. Explain why over/under-collections of gas cost are included in this account instead of Account 191 – Unrecovered Purchased Gas Cost.

13. Refer to Navitas's response to Staff's Second Request, Item 1a. Explain whether Navitas is amending its Alternative Rate Adjustment filing (ARF) application based on the proposed adjustments.

14. Refer to Navitas's response to Staff's Second Request, Item 9. The information as provided in the Annual Report of Navitas to the Public Service Commission for the Year Ending December 31, 2023 (2023 Annual Report), should correctly correspond with the Federal Energy Regulatory Commission (FERC) Uniform System of Accounts Prescribed for Natural Gas Companies Subject to the Provisions of the Natural Gas Act (FERC Uniform System of Accounts for Natural Gas). Provide an expanded response for each part of the request, as the provided information is not sufficient. If Navitas cannot provide a complete response to each part of the request, explain why it is not able to fully respond to the request.

15. Refer to Navitas's response to Staff's Second Request, Item 14. Explain whether Navitas is amending its ARF application based on the inclusion of the proposed rates.

16. Refer to Navitas's response to Staff's Second Request, Item 15. Explain whether Navitas is amending its ARF application based on the inclusion of the proposed rates.

A handwritten signature in blue ink, appearing to read "Linda C. Bridwell", is written above a horizontal line. To the right of the signature, the word "For" is written in blue ink.

Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
P.O. Box 615  
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DATED DEC 09 2024

cc: Parties of Record

Case No. 2024-00252



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