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PUBLIC SERVICE  
COMMISSION

August 19, 2024

Kentucky Public Service Commission  
Post Office Box 615  
Frankfort, KY 40602

Re: Navitas KY NG, LLC Rate Adjustment Request

Dear Madam or Sir,

I am writing to offer comments regarding the rate adjustment request recently submitted to the PSC by Navitas KY NG, LLC (Navitas) for its natural gas customers located in Kentucky. Navitas acquired these customers through a recent acquisition of the B&H Gas Co. and the Johnson County Gas Co. that covers customers in both Floyd and Johnson Counties in Eastern Kentucky (EKY). I am a residential customer of the former B&H Gas Co. in Floyd County. Soon thereafter, Navitas adopted their already existing rate structure from another company they also operated in KY that dramatically raised the rates for their EKY customers. Now, Navitas is making another effort to substantially raise these rates through this request.

One such example of these extreme rate increases is with the astronomical increase in the price of natural gas (1<sup>st</sup> CCF) for residential customers going up from \$0.86/CCF to \$24.50/CCF. Navitas disguised this increase even further by converting from "MCF (1000 cubic feet)" (more common unit of measurement for commerce sales) to "CCF (100 cubic feet)" pricing of the first quantity of natural gas. The true price increase of the first quantity of natural gas has gone up from \$8.60/MCF to \$245/MCF! As a reference, the "Henry Hub" commodity pricing of natural gas at the time of the writing of this letter is hovering around \$2.10/Dth (Dekatherm, approximately the same as 1 MCF). While I don't know what price Navitas purchases their natural gas from local producers or marketers, I am quite confident it is in the range of the Henry Hub pricing possibly with some nominal markup. Additionally, the monthly service charge and the "Above 1<sup>st</sup> CCF" rate is also being increased (130% and 97%, respectively), thankfully not nearly as much as the "1<sup>st</sup> CCF" rate.

The monthly service charges, "1<sup>st</sup> CCF," and "Above 1<sup>st</sup> CCF" charges are also being raised for commercial customers by 197%, 2749%, and 85%, respectively and I'm sure that each of these commercial customers will have to raise prices of their goods and services to offset this significant increase to their cost of business. Industrial and agricultural (currently none, according to their letter to customers) will incur an even larger increase to their "1<sup>st</sup> CCF," and "Above 1<sup>st</sup> CCF" charges by 893%, 17,226%, and 41%, respectively for industrial customers.

The customers that are served by Navitas are in some of the most economically depressed and challenging regions of the entire state and these rates will cause a significant burden on top of all the other rising prices that have affected them. The term "fixed income" is often tossed around to make a point about the painful inability of someone being able to manage higher rates for services or higher prices due to inflation. However, in this case, it is very relevant as many (if not even the majority) of customers on these systems are in fact fixed-income families that are already struggling to make ends meet with their monthly budget constraints. While I am not one of those unfortunate customers and will be able to continue to make ends meet, I am writing on behalf of the many customers that will have to reprioritize their decisions around being warm this winter versus purchasing food, medicine, or many other important items in their lives.

Thank you for your consideration of my comments in your important decision around whether this rate increase is warranted and if so, how much of an increase is appropriate.

Respectfully submitted,

Maverick Bentley

A handwritten signature in black ink that reads "Maverick Bentley". The signature is written in a cursive style with a large, stylized "M" and "B".

33 Shop Branch  
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