

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC ALLEGED FAILURE OF NAVITAS)	
KY NG, LLC TO COMPLY WITH KRS 278.030,)	CASE NO.
KRS 278.180(1), KRS 278.274, COMMISSION)	2025-00010
ORDERS, AND ITS GAS COST RECOVERY)	
TARIFF)	

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 March 31, 2025. 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

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).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

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 Cases No. 2024-00252² and 2024-00401. State whether any of the expenses identified in Navitas KY's Case No. 2024-00401 [supplemental response to Commission Staff's First Request for Information](#),³ Item 2, were included in Navitas KY's

² Case No. 2024-00252, *Electronic Application of Navitas KY NG, LLC for an Alternative Rate Filing Pursuant to 807 KAR 5:076* (application tendered Aug. 16, 2024).

³ Case No. 2024-00401, *Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC*, Navitas KY NG, LLC's Supplemental Response to Commission Staff's First Request for Information (filed Dec. 31, 2024).

revenue requirement calculation in its Alternative Rate Filing (ARF) filing in Case No. 2024-00252. If so, identify which expenses and the corresponding amounts.

2. Refer to Case Nos. 2020-00396 and 2024-00252.

a. State whether the cost of the refunds required by the final Order in Case No. 2020-00396⁴ were recovered in any Gas Cost Recovery (GCR) filing. If so, identify the amounts and the corresponding case numbers.

b. State whether the cost of the refunds required by the final Order in Case No. 2020-00396 were included in Navitas KY's revenue requirement calculation in its ARF filing in Case No. 2024-00252. If so, identify amounts used in the calculation.

3. Refer to Case No. 2019-00430 and Navitas KY's response to the February 3, 2025 opening Order in this case, page 5.

a. Identify the case numbers, dates, and document names of any documents Navitas KY has filed to comply with the final Order in Case No. 2019-00430.⁵

b. Explain why any of the information required by the final order in Case No. 2019-00430 was not provided.

4. Refer to Case No. 2022-00109 and Navitas KY's response to the February 3, 2025 opening Order in this case, page 5.

⁴ 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), Order at 19.

⁵ Case No. 2019-00430, *Electronic Application of Navitas KY NG, LLC For an Alternate Rate Adjustment* (Ky. PSC June 17, 2020), Order at 8.

a. Identify the case numbers, dates, and names of any documents Navitas KY has filed to comply with the final Order in Case No. 2022-00109.⁶

b. Explain why any of the information required by the final Order in Case No. 2022-00109⁷ was not provided.

5. Refer to Navitas KY's response to the opening Order, pages 1–2, Navitas KY's response to [Commission Staff's First Request for Information](#), Items 1 and 4 in Case No. 2024-00401, and Navitas KY's 1st Revised Tariff, Sheet No. 25.

a. State whether Navitas KY pays Russmar a per volume rate to supply, transport, or store gas as contemplated by Navitas KY's tariff.

b. Provide a copy of any Navitas KY contract with Russmar.

c. Explain the reason for the “pressure issue causing the flame outs” that necessitated reserving and purchasing liquefied natural gas from Kinetrex.

6. Provide total line loss percentages for each month beginning January 2023 through February 2025.

7. Refer to Navitas KY's response to the opening Order, pages 2–3 and Navitas KY's P.S.C. KY NO. 1, Original Sheet No. 24 and 1st Revised Sheet No. 25, which defines expected gas cost (EGC) as “the average expected cost of gas supplies” and defines average expected cost as the cost of “purchased volumes during the twelve month period ending with the reporting period to which the GCR will apply, divided by the corresponding sales volume.”

⁶ Case No. 2022-00109, *Electronic Purchased Gas Adjustment Filing of Navitas KY NG, LLC* (Ky. PSC Apr. 29, 2022), Order at 4.

⁷ Case No. 2022-00109, Apr. 29, 2022 Order at 4.

a. Confirm that Navitas KY is currently utilizing the referenced Tariff sheets to govern the distribution and sale of gas.

b. If subpart "a." is not confirmed, explain why the Tariff sheets are not being utilized and identify the period in which Navitas KY has diverged from its Tariff.

c. If subpart "a." is confirmed, explain how "Navitas KY was not aware that the Commission expected or required expected gas costs to be based on gas purchases which occurred in the prior 12-month period, consistent with the fact that the expectations or requirements of the Commission regarding the GCR mechanism are generally not set forth with particularity in statute, regulation, or elsewhere."



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DATED MAR 14 2025

cc: Parties of Record

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