IN THE TENNESSEE REGULATORY AUTHORITY AT NASHVILLE, TENNESSEE

IN RE:)
PETITION OF NAVITAS TN NG, LLC)) DOCKET NO. 12-00068
FOR AN ADJUSTMENT TO ITS NATURAL GAS RATES AND APPROVAL OF REVISED) filed electronically in the
TARIFFS	docket room on 11/30/2012

NAVITAS TN NG, LLC's SUPPLEMENTAL DOCUMENTATION IN RESPONSE TO DISCOVERY REQUESTS OF THE CONSUMER ADVOCATE AND PROTECTION DIVISION

COMES NOW Petitioner NAVITAS TN NG, LLC ("Navitas"), by and through counsel, and hereby submits the following supplemental documentation in response to the Consumer Advocate and Protection Division's discovery requests to further supplement the record in this proceeding. Navitas submits herewith the following unredacted documents in this proceeding:

- a. Navitas O & M Calculation Spreadsheet;
- b. NUC FCFA Q1 2012 Spreadsheet;
- c. Relative Net Plant Data Chart;
- d. Spreadsheet Containing Proposed Rate Design;

Dated this the 30th day of November, 2011.

RESPECTFULLY SUBMITTED,

Klint W. Alexander, Esq.

Wyatt, Tarrant & Combs, LLP

2525 West End Avenue, Suite 1500

Nashville, Tennessee 37203

(615) 244-0020

Counsel for Navitas, TN NG, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2012, a copy of the foregoing was filed in the above-captioned action. A copy will be served by regular U.S. Mail and electronic mail to:

John J. Baroni, Esq. Assistant Attorney General Office of the Attorney General Consumer Advocate and Protection Division P.O. Box 20207 Nashville, Tennessee 37202-0207 (615) 741-8726

Kelly Cashman-Grams, Esq. General Counsel Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243 kelly.grams@tn.gov

Klint Alexander

Hypothetical Explanation

O&M 2,500,000 A Capital-KY 500,000 B NUC Costs 3,000,000 C

I. Allocation under current method (calculating total costs allocated by % x Total NUC costs) 33% x $3,\!000,\!000$

	Total	Capital	O&M
TN	1,000,000	-	1,000,000
KY	1,000,000	500,000	500,000
OK	1,000,000	-	1,000,000
Total	3,000,000	500,000	2,500,000
	C	В	A

II. Allocated costs the way I suggest (allocating O&M costs based on %, direct charging capital costs) $33\% \times 2,500,000$ (O&M); Direct charge of actual capital

	Total	Capital	O&M
TN	833,333	-	833,333
KY	1,333,333	500,000	833,333
OK	833,333	-	833,333
Total	3,000,000	500,000	2,500,000
	C	В	A

Difference in costs to each state (I - II)

			Over/(Under
	I. Totals	II. Totals) charged
TN	1,000,000	833,333	166,667
KY	1,000,000	1,333,333	(333,333)
OK	1,000,000	833,333	166,667
Total	3,000,000	3,000,000	(0)

Operations and Maintenance			\$D	C/M	Custome	r Miles		Ro⊔te #	Density	Rate Code	Tariff	CXT
Byrdstown	2,552		\$ 58.00	8.8	4		Ď.	0		0 0	\$0,000	\$0.00
Fentress & Pickett *FT RATE	384		\$ 64.00	12				0	***************************************	0 0	\$0.000	\$0.00
Jellico	22,540		\$ 46.00	16.9	490) 2	}	0		0 0	\$0.000	\$0.00
Subtotal	25,476		47.18		540	34.:	5					\$0.000
Percentages												
O&M labor	80%		37.7422									
O&M equipment	20%		9.4356									
New construction	0.00%											
New constr labor	0.0%											
New constr equip	0.0%			Stens To C	alculate C	ustomers (rom Rate C	ode Report):				
Breakdown												
O&M labor	20,380.80	20,380.79										
O&M equipment	5,095.20	5,095.22										
NC labor					Custom/mi	le	Chg/cust		Tariff		Cstmr Dnsty	,
NC equipment				Domestic Ta	ips		\$ 64.00		Community		1 to 20	
		25,476.00	_	1	to	5	\$ 64.00		Town		21 to 35	
	•	1		6		10	58.00		City		36 to 50	
Materials		1		11		15	52.00		Metro		51 and Over	
Materials / New Construction	101.14	1		16		20	46.00				0.0.000	
	\$	101.14	-	21		25	41.00					
	·	1		26		30	36.00					
Commodity		1		31		35	31.00					
Jellico	35,6H7, 5 0	1 ,		38				······································			· · · · · · · · · · · · · · · · · · ·	***************************************
	\$	33,687.00	John.	highlig	hted i	านเกษย	rs are	for Mar	ch. Bv a	dding Fe	eb. num	nbers
				- 46		50	18.00		-	_		
Meter rent			(t)	nere w	as no	aetivit	v for⊭.da	ın) resul	t ties to	the Nav	itas P&	ιL
Meters out	588	.l. l	\	56		60	10.00	•				-
Monthly charge	1.85	₩		•	lst - w	rhv is r	ow 22	not incl	uded on	TN P&L		
, ,	9	1,087.80	_			•						
	`	1,002.00		2nd	- Hov	v are r	umber	's in cell	s H3-H5	arrived	at?	
Finance charge												
Interest on notes	######################################		3rd - w	hat are	the i	nnuts	lhv ma	nth) tha	t these	number	s come	from
Interest on invoice							·~ yo	,				
	\$		_									

Total	\$ 60,351.94		
	\$ 26,664.94		
	\$ 55,496.88	55,234	\$ 262,88
	\$ 262.88		
	\$ (0.25)		
	\$ 55,496.88		
	\$ 26,563.80		
	\$ 28,669.95		
	\$ 263.13		
	\$ 55,233.75		
	\$ (0.25)		

	31-Dec-10	31-Mar-11	30-Jun-11	30-Sep-11	31-Dec-11		
Revenue Commodity cost Bad debt expense Non commodity revenue	<u> </u>	\$ 267,783 83,782	\$ 64,385 92,660 (28,275)	\$ 46,065 31,128 6,280 8,657	\$ 78,627 16,754 (69) 61,942	\$ 456,860 \$ 224,324 \$ 6,211 226,325	
Direct costs Depreciation		55,234 ↑10,371	76,207 12,171	78,723 13,189	83,449 13,903	\$ 293,613 \$ 49,634	\$ (304,288.01)
Overheads General expense Office expense Accounting expense Business expense New systems expense Total overheads	7	170 555 725	378 474 852	390 267 657	435 7,410 7,845	\$ 1,373 \$ 8,706	
Other expense Customer deposit int expns						\$ -	
Total operating costs Operating income	7 (7)	66,330 117,671	89,230 (117,505)	92,569 (83,912)	105,197 (43,255)	<u>353,326</u> (127,001)	
Other income EBIT	\$ (7)	\$ 117,671	950 \$ (116,555)	(3,904) \$ (87,816)	1,366 \$ (41,889)	\$ (1,588) \$ (128,589)	
Interest income Interest expense EBT	\$ (7)	9,166 \$ 108,505	9,101 \$ (125,656) (17,151)	9,035 \$ (96,851) (114,002)	8,966 \$ (50,855) (164,857)	\$ - \$ 36,268 \$ (164,857)	
		31.29%	143,92%	67.57%	thses numbers tie o 21.31%	out to Page 45 of the Navitas pet	ition

John, this number ties out to the amount allocated from the Total Tn NG worksheet next to this worksheet

(262.88)

(in ,000s)	FCFA	ОК3	Ldiv	Sub total OK
Gross Plant	6,676	1,180	1,855	9,711
Acquisition Adjustment	793	(189)	720	1,324
Accumulated Depreciation	(4,255)	(502)	(1,009)	(5,766)
Sub total	3,214	489	1,566	5,269
Net Plant (excluding OLTA) Relative Net Plant	2,421	678	846	3,945 79%

Note - this analysis excludes OLTA and other balance sheet accounts that could effect net plant. Note - this analysis excludes allocation of Costa Mesa office and Company aircraft.

TN	KY
1,756	1,045
(265)	(56)
(894)	(870)
597	119
862 17%	175 4%
17%	4%

Total 386																										
31-Dec-12 31																										
30-Non-12 30																										
31-0ct-12 31	31,769														5,919	3,951	3,564	æ	25.	, F	5 523	8	;	2	10 126	1.074
30-Sep-12 30	18,862														1,374	4,041		æ	307	¥	9	9,71	3	8 9	2.75	7
31-Aug-12 31	17,268														1,382	4,014		a	ARS	592	3.944	191	•	164	86.0	923
31-Jul-12 31	18,391														1,379	4,059	. '	8	569	756	3,986	159	Ş	8 2	7,341	962
30-Jun-12	21,539														1,663	4,068	. •	4	3	765	4,454	149	Ş	3	9.629	1,251
31-May-12 31	26,545													į	6,234	4,059	. !	Q	698	765	4,874	71	286	34	9,791	988
30-Apr-12 31-May-12 30 31	31,211													į	6,429	4,068	3,062	7	56	22	4,570	8	ŝ	3	016,01	950
31-Mar-12 32	50,492													į	6,59	90,0	15,168	2	1,109	738	8,654	142	313	182	13,650	1,179
28-Feb-12 28	73,806													3	200	4,113	166/17	8	1,124	220	15,696	234	2112	787	17,524	1,50
31-Jen-12 31	94,359													. (9	900	97,788	3	1,139	747	22,507	331	515	182	20,776	27,1
Total 365				enne	3	Hiclancy																				
31-Dec-11	68,168			501,337 Target non-commodity revenue	Proposed 2014 Tariff revenue	Continued tariff revenue deficiency								9		בפייה בר	200	2	1,139	765	14,660	812	312	182	11,011	1,459
30-Nov-11	48,719			Target non-										9000	000	200		•	1,034	<u>%</u>	9,690	166	386	168	12,868	1,211
30-Sept 1 31-Oct-11 30-Nov-11 31-Dec-11 30 31 30 31				501,337	501,128	508																				
				28	al	5																				
£					mue 400,827	_																				
un-11 314.				Proposed 2015 Tariff revenue	Proposed 2014 Tariff revenue	Annuarized rate increase on January 1, 2014																				
May-11 30-J				Proposed 2	Proposed	rate increase																				
30 31-					1																					
31-Mar-11 3			L				J									45.9%				;	24.5%				29.6%	
31-den-11 28-feb-11 31-March 31-March 31 30 31 31 31 31 31 31 31 31 31 31 31																230,074					122,852				148,192	501,128
31-Jen-11													₽.	14,985	23.985				14.985	23,985			_	39.965		
		3	0770	2,000	8		0.110	2000	7.0		0.555	9005	Proposed Tariffs	\$ 1.665	8.00	\$ 0.995			\$ 1.665	2 9.80	2		\$ 2.885	2 14.00	\$ 0.995	
Total calculated NCR	Proposed tariffs	Proposed tartif changes Roudenliel	First nine	Moler charge	Groater then nine	Commencial	First nine	Meler chargo		Industrial	First nine	Motor charge	-	First nine	Motor charge	Greeter then nine		Commercial	First nine	Meter charge	Ordality intern inne	lactuations	First nino	Melor charge	Greater than nino	

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Frigored 2023 Traffil freedom 11,527 15,529 15,524 15,52	Proposed 2021 Trail for the communication communicatio										30,603	41,919		57,728	45,264	31,691	20,329	17,612	12,959	66.41	10,597	11,467	20,629			
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			\$2.2%	25.7%	22.1%
Total 365	155,089		105,050	51,696	44,590
31-Dec-12 31					
30-Nov-12 30					
31-0ct-12	12,889		2,634 2,634 2,855	173 612 2,498 43	23 3,140 323
30-Sep-12 30	8,112		380 380 380 50	504 504 77	2,208 2,208 287
31-4ug-12 31	365'2		208 2,676 354	70 510 1,697 ET	16 72 1,933 289
31-Jul-12 31	7,942		207,2 20,7 20,0 21,0	¥ 82 127,1	18 72 2,235 291
30-Jun-12 30	9,017		25. 27.7. 51.2 01	88 510 1,931 65	81 57 526,5 778
31-May-12 31	10,960		936 2,706 1,581 13	131 510 2,168 48	25 72 2,831 265
30.Apr-12 30	12,571		965 217,2 2,77,5 31	4 8 80 G	27 78 3,322 286
31-Mm·12 32	20,052		990 2,724 7,682 36	167 492 3,745 60	27 78 4,148 354
28-Feb-12 28	£8,03,		2742 2,742 12,649	169 480 6,580	27 78 5,316 452
31-Jan-12 31	36,973		995 2,724 16,863	171 498 9,322 131	27 87 362,9 843.
Total 365	220,378		288	808	5,303
1 31-Dec-11	26,821		2,706 11,017	171 510 6,167 90	27 78 5,163 439
11 30-Nov-11	6 19,427		5 952. 2 2,712 2 6,954 3 25	-	25 27 28 2910 8 3,910 8 36.
1 31-Oct-11	35,576		2 695 2 1,902 3 2,722 3 33	306 1	1 2 2 2 2 8 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9
1 30-Sep-11	8,120		2,652	25 486 24 486	42 22 24
31-Aug-11 31	8,847		249 2,664 433 10		2 2 28 24 24 25 25
31-24-17	7,856		176 2,676. 359	95 516 2,848 59	2,098 2,098 273
30-Jun-11	7,321		247 2,070 487 9	95 288 1,958	16 42 2,118 311
31-May-11	11,341		925 2,484 2,017 13	821 88.25.28	25 25 25 25 25 25 25 25 25 25 25 25 25 2
30-Apr-11 30	17,662		979 2,678 6,260 23	164 462 3,386 55	25 27 4. 27 4. 27 4.
31-Mar-11 31	22,030		979 2,634 8,597 28	169 480 4,652 71	25 7.2 4.423 411
31-dep-11 23-feb-11 31-dep-11 31-dep-11 30-dep-11 30-dep-11 31 28 31 30 31 30	33,293		2,013 2,676 15,154	178 498 6,952 97	25 66, 167,8 020
31-Jan-11 31	42,084	æ.	1,010 2,898 18,309 49	191 534 10,566	27 72 8,477 215
		urent Teriffs	\$ 0.25 \$ 0.40 \$ 0.40	s 6.00 s 0.40	\$ 0.25 \$ 0.20 \$ 0.30
	Current teriffs	Residential	1st nine Meter charge Flow charge	1st nine Meter charge Flow charge Incustrial	1st nine Meter charge Flow charge