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	)	
TARIFFS	)	

DATA RESPONSES OF THE CONSUMER ADVOCATE AND PROTECTION DIVISION TO TENNESSEE REGULATORY AUTHORITY

The Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), hereby submits its responses to the data request of the Tennessee Regulatory Authority ("TRA") dated December 19, 2012. These responses are intended to facilitate the Settlement Agreement filed in this Docket and relate to agreements reached in compromise and solely for the purpose of settlement of this matter. The Consumer Advocate expressly reserves the right to assert any position in any future proceeding, in this or any other jurisdiction. These responses shall not have any precedential effect in any future proceeding or be binding on any of the Parties in this or any other jurisdiction except to the limited extent necessary to implement the provisions of the Settlement Agreement. The Consumer Advocate requests that the TRA order that these responses shall not be cited by the Parties or any other entity as binding precedent in any other proceeding before the TRA or any court, state or federal.

1. Provide a complete revised tariff including all proposed rates, terms and conditions as outlined in the Agreement. The tariffs need to include all phases of rates, include terms and conditions, and should otherwise explain in detail all provisions requested in the Agreement (e.g.

to whom the phase-in rates will apply and details of the exact circumstances that customers must meet in order to have fees waived).

RESPONSE:

As set forth in paragraph 24 of the Settlement Agreement, the Consumer Advocate defers to Navitas to complete the tariff and reserves the right to review and comment on it.

2. Is the proposal to waive fees for customers in certain situations to be funded by other ratepayers or Navitas stockholders? Explain and identify any revenue requirement of this proposal.

RESPONSE:

No. The revenue requirement was not adjusted for any waived fees. The Consumer Advocate understands that Navitas will describe the program more fully in its proposed tariff.

3. Referring to paragraph 21 of the Agreement, is it the parties' position that customers within a specific class (e.g. residential) will be charged different rates for the same services simply due to subscription dates? If so, provide the rationale and legal basis to justify how customers within the same specific class receiving the same service (natural gas) can be charged different rates solely on the basis of subscription date.

RESPONSE:

Yes. The terms of the Settlement Agreement indicate that customers added to the system subsequent to its approval ("new customers") will be charged the rates from the final phase while all customers that exist at the date of the approval of any settlement agreement ("existing customers") will get a phased-in rate increase. It should be noted that the revenue requirement was not adjusted for any growth. Therefore, the rate design

in Exhibit B of the Settlement Agreement assumes that all revenue comes from only existing customers and, thus, is based entirely on phased-in rates.

The public policy support for treating new customers differently relates to the policyunderlying the phase-in for any customer. As a threshold matter, Navitas could argue it is entitled to the full revenue requirement in the first year following any TRA order.[1] As part of the Settlement Agreement, Navitas voluntarily agreed to defer a portion of its revenue with a phase-in process. This phase-in process is intended to help minimize any rate shock for existing customers that have had the same rates since 1993 to encourage them to stay on the system and remain happy customers. New Navitas customers, however, are not susceptible to the same rate shock as existing customers and thus do not have the same public policy need for a phase-in of the rate increase.

Under the facts of this case, the Consumer Advocate believes public policy supports the phase-in of rates because it avoids unjust discrimination among rate payers, in accordance with the laws of Tennessee.[2] The Consumer Advocate asserts that the different treatment of existing customers from any potential new customers is not unjust under the circumstances of this case To avoid any challenges based on the lack of opportunity to be heard by new customers before interim rate increases and to provide Navitas the earliest opportunity to receive its legally entitled rate increase, the Settlement Agreement contains terms that could result in two rates for customers receiving the same service.

4. On page ten of Mr. Hartline's rebuttal testimony, he states:

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[1] *See Duquesne Light Co. v. Barasch,* 488 U.S. 299, 314-15 (1989) (citing *Bluefield Water Works & Improvement Co. v. Public Service Comm'n of West Virginia,* 262 U.S. 679, 692-93 (1923) ("A public utility is entitled to such rates as will permit it to earn a return . . . equal to that generally being made at the same time and in the same general part of the country on investments in other business undertakings which are attended by corresponding risks and uncertainties . . . .")). The Consumer Advocate believes a utility may volunteer to defer part of the rate increase to fulfill an approved revenue requirement.

[2] TENN. CODE ANN. 65-4-122 (1995); TENN. CODE ANN. 65-5-104 (1919) (revised 1980). An example of other situations when two rates apply to similarly situated rate payers occurs in the case of special contracts.

> During the transition period, the Authority approved Navitas' contract with Tri-Star Energy to perform DIMP and other work. The regulatory treatment prescribed in the Authority's Order dated May 22, 2012 called for the portion of the contract attributable to Tennessee to be capitalized and included in net plant. The amount of this capitalization of $27,300 is shown on the schedule 2 Rate Base.

Provide the cite in any TRA order wherein the Authority approved the Contract between Navitas and Tri-Star Energy. Also, provide any reference within any TRA order allowing recovery of the DIMP costs prior to the Authority considering and evaluating the DIMP costs, including the hiring of a consultant. If the Consumer Advocate performed an analysis of the DIMP costs, provide such analysis.

RESPONSE:

In considering whether to include costs for DIMP in the Settlement Agreement, the Consumer Advocate considered the fact that the federal government has mandated that gas companies, including Navitas, prepare an Operations and Maintenance manual, emergency plan, DIMP plan, and a public awareness plan, and such documents should be completed (including testing), and that such documents must be available for inspection by the TRA during the attrition year (August 2013). The Consumer Advocate also considered that Navitas's lack of compliance could result in severe penalties or, worse, broken pipes that could potentially endanger people's lives. While the means of attaining the goal of DIMP compliance may vary by company, the Consumer Advocate, for settlement purposes, found that the end result of creating documents to comply with federal mandates is a non-discretionary project that Navitas must perform. The Consumer Advocate recognizes that

the contract Navitas has with Tri-Star has not been approved by the TRA and the related costs have not been yet reviewed by the TRA.[3]

Importantly, this Settlement Agreement does not approve the means by which Navitas has chosen to meet its federal obligations. This Settlement Agreement makes no comment as to whether the means are the best method by which to achieve federal compliance, nor does the Settlement Agreement allow for the cost recovery to be precedential in future rate cases. Rather, this Settlement Agreement includes costs for DIMP because the asset (i.e. the DIMP compliance documents) will be used and useful in the attrition year and the asset is a non-discretionary, federally mandated project. It should be noted that there are many contracts a utility has that the Consumer Advocate does not approve of, but for settlement purposes, the costs for the project underlying the contract are included in settlement agreements, often as a result of the give-and-take process of settlement negotiations. A recent example of costs included in a settlement but not approved or having any precedential value is the settlement with Tennessee American Water Company ("TAWC"), which contained costs for Business Transformation, a purely discretionary project to implement a new IT system.[4]

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[3] Transcript of Authority Conference, Monday, May 7, 2012, lines 19-23.

[4] Per Schedule BT-1.1 of Gary VerDouw's testimony, TAWC's petition of $10,586,344 included $7,750,804 for Tennessee's allocation of a $320 million Business Transformation. The Business Transformation project is purely discretionary and not in response to any state or federal regulation. Because of the give and take in the negotiation process, these costs, including the consulting costs, were included in the settlement with the caveat that such costs can be reviewed to determine whether they are reasonable and prudent and accurate in future rate cases. Settlement Agreement for TRA Docket No. 12-00049, pg. 5, ¶ 13(f) (filed Oct. 1, 2012) ("That recovery of all costs in developing and implementing new SAP-based software . . . is included in the agreed-upon $5.2 million annual revenue requirement. The Intervening Parties reserve the right to challenge the reasonableness, prudency and accuracy of any costs associated with Business Transformation or other system implemented by AWWC and TAWC in future proceedings.").

During the settlement negotiations with Navitas, the Consumer Advocate considered the safety of the people living in Navitas's service area[5] and consistent treatment among gas companies.[6] The Consumer Advocate considered how other gas companies were treated and noted that the DIMP costs were included in the recent settlement with Atmos by all parties and the Authority.[7] The Consumer Advocate thought that consistent treatment among gas companies by allowing recovery for costs required by federal mandate was warranted, especially given the objective of such projects is the safety of all those living in the gas company service areas.

The Consumer Advocate is aware that the TRA Order in Docket No. 12-00020 states that the TRA does not approve the contract and would like to review the costs prior to recovery. The Consumer Advocate contends that the Settlement Agreement does not contradict that order, but rather should be read in conjunction with the order in that, after the TRA reviews the actual costs, it allows a future proceeding (e.g. rate case or separate hearing) to examine costs incurred under the contract for reasonableness and recovery of any reasonable costs not already covered in proposed rates.

As for the $26,964 costs included in the Settlement Agreement,[8] the Consumer Advocate looked to the contract because its terms provided a known and measurable cost by which to value the DIMP compliance assets. The contract Navitas has with Tri-Star

[5] See Dr. Hill's notes in Transcript of Authority Conference, *supra* note 3, pg. 13, lines 8-12: "The purpose of this plan is to reduce pipeline accidents, deaths, and injuries by causing operators to identify risks that are specific to their system and put in place measures to keep these risks from happening."
[6] The Consumer Advocate recognizes that every utility is different and each rate case is unique. Thus, the same cost is treated differently for recovery purposes for different utilities in many instances. For settlement purposes in this case only, the Consumer Advocate considered consistent treatment warranted for DIMP compliance costs of recognizing an asset in the year the asset is placed in service because of the underlying safety purpose of the federally mandated project.
[7] Settlement Agreement for TRA Docket No. 12-00064 (filed Oct. 30, 2012) and all supporting testimony concerning requested capital projects for the attrition year filed on the same docket by Atmos.
[8] *See* D/ in the Settlement Agreement Exhibit A, Schedule 4.A.3; *see also* Appendix B, Schedule 4.A.3

spans over 63 months. By the terms of the contract, it is an asset financed by the service provider, whereby Tri-Star will create the assets in the first year, but Navitas will pay Tri-Star over 63 months. Also by the terms of the contract, the exact cost of the asset is uncertain until the sixty-third month because the monthly charges vary by the number of customers. For purposes of the Settlement Agreement, the Consumer Advocate calculated the DIMP asset using the minimum payments of required by the contract and the Tennessee Customer Allocation percentage in Navitas's petition:

Minimum monthly payments:	**$4,000**
Minimum number of payments:	**x 63**
Tennessee Customer Allocation:	**x 10.7%**
Tennessee DIMP Asset	**$26,964**

The Consumer Advocate then took the unamortized balance as of January 1, 2013, the first day of the attrition year to calculate the amortization expense to include in the expenses.

The Consumer Advocate identified during its review of the contract that some of the $0.25 of each $1.00 is attributed to annual testing. The first testing occurs prior to the initial TRA inspection, and essentially will be used to determine whether the asset is ready to be placed into service. The subsequent annual testing is an ongoing compliance requirement. Normally, the Consumer Advocate expert Charlena Aumiller would have shown these ongoing items as an expense. She did not do so in this case because the TRA Order for Docket No. 12-00020 was silent as to the timing of any recovery. For purposes of settling only this case, the Consumer Advocate included recovery of known and measurable costs in the year the asset is placed in service. This inclusion adheres to the matching principle.

Additionally, the Consumer Advocate's inclusion of some costs for DIMP compliance is somewhat similar to the environmental costs Atmos incurred to remediate environmental sites in Tennessee.[9] In that case, the exact costs were uncertain but all parties knew that Atmos would incur some costs. Atmos was permitted to recover an agreed-upon amount for four years with an examination of exact costs incurred after completion of the project. For purposes of settling only this case, the Consumer Advocate utilized a similar approach by including some of the costs for DIMP compliance in the year the asset is placed in service, knowing that the final amount is uncertain, so as to permit the company to recover for the costs of the asset before the end of the five-year contract.

As discussed further in the following paragraphs, the Consumer Advocate recognizes that there could be many interpretations to the TRA Order in Docket No. 12-00020. The approach of including some of the known and measurable costs in the year the asset will be placed in service was utilized only for settlement purposes as part of the give-and-take process during negotiations. It is also consistent with the TRA Order for Docket No. 12-00020 in that the Settlement Agreement does not approves the contract.

As for the accounting treatment of the DIMP compliance costs, Ms. Aumiller interpreted the Order to mean DIMP compliance costs were to be treated as capital, and any review of such costs would relate to whether the final amount per the contract is reasonable and prudent. Ms. Aumiller and the Consumer Advocate acknowledge that different interpretations of the TRA order for Docket No. 12-00020 are plausible, including but not limited to treating the costs for annual testing as an expense rather than capital. Additionally, Ms. Aumiller and the Consumer Advocate also acknowledge that another method to determine the capitalized costs was to use the actual customers from the test

[9] *See* TRA Order, Docket No. 07-00081.

year of April 1, 2011 to March 31, 2012. Appendix A shows the calculation of both approaches as well as identifies the initial capital asset as separate from the estimated costs for ongoing annual testing for years 2 through 5 of the contract.

Schedule 4.A.3 of the Settlement Agreement assumes that the examination of the exact costs at a later time (e.g. periodically throughout the sixty-three month contract, after it is completed) would occur in a different docket, in which the Consumer Advocate may participate. If the Authority intended to address the issues in this docket, however, the Consumer Advocate welcomes guidance of how to proceed.

5. For reference only, provide revised schedules removing the $27,300 amount of capitalization for DIMP costs from the Agreement.

RESPONSE:

See Appendix B.

6. For other revenues, provide a price-out of current and proposed amounts as set forth on Settlement Exhibit A, Schedules 9 and 12. Please include all assumptions used in the analysis and identify revenues by individual charges/services.

RESPONSE:

The Other Revenue on Schedule 12 is from Schedule 9, thus the explanation is the same for both schedules. The Other Revenue under the Proposed Rates column in Schedule 9 is a gross up of the Other Revenue under the Current Rates. First, the proportion of Other Revenue to Gas Sales & Transportation Revenues under Current Rates was determined, as shown on Schedule 11, the Revenue Conversion Schedule. Second, this proportion was multiplied by the change in Gas Sales & Transportation Revenues under Proposed Rates, as shown near B/ on Schedule 9, to arrive at the change in

Other Revenues, as shown near C/ on Schedule 9 in Appendix B. The Other Revenue was not adjusted for any of the consumer protection provisions in the Settlement Agreement. Rather, the Other Revenue under the Proposed Rates of the Settlement corresponds with the increase in Gas Sales & Transportation Revenues (i.e. operating revenue) under the Proposed Rates.

7. Paragraph 25.D of the Agreement states that reconnection of service will be provided (after appropriate payment from the customer) within two days. Explain how Navitas plans to track these reconnections. Also, if Navitas fails to reconnect service within two days, is there a penalty or is the customer somehow compensated for Navitas' failure to abide by its tariff?

RESPONSE:

The Consumer Advocate did not adjust the revenue requirement for this program. The Consumer Advocate understands that Navitas will describe the program more fully in its proposed tariff.

RESPECTFULLY SUBMITTED

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Consumer Advocate and Protection Division
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Dated: December 21, 2012.

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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Thomas Hartline
Navitas Utility Corporation
3186 – D Airway Avenue
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This the 21st day of December, 2012.

JOHN BARONI

Appendix A

Appendix A
DIMP Calculations
CAPD Response to TRA Data Request #4, dated December 20, 2012

Relevant Contract Terms

		Source:
Period:	63 months	§ 3, ¶ 3
Payment:	$1.00/ customer	§ 2
Minimum monthly payment:	$ 4,000	§ 2, ¶ 8(ii)

Calculation of asset based on minimum required payments:

		Comments:
Capital Cost (first 12 months):	$ 1.00	See Note 1
# of TN customers	428	Calculation of 10.7% x 4000 minimum customers per contract
# of months	12	
Subtotal months 1-12	$ 5,136	
Capital Cost (months 13-63)	$ 0.75	See Note 1
# of TN customers	428	
# of months	51	
Subtotal months 13-63	$ 16,371	
Expense costs (months 13-63)	$ 0.25	See Note 1
# of TN customers	428	
Monthly expenses	$ 107	

Value of capital asset by August 2013	$ 21,507
Annual ongoing compliance	$ 1,284

Calculation of asset based on actual customers from the test year:

		Comments:
Capital Cost (first 12 months):	$ 1.00	See Note 1
# of TN customers (whole year)	5,435	# of customers from test year of 4/1/11 to 3/31/12*
# of years	1	
Subtotal months 1-12	$ 5,435	
Capital Cost (months 13-63)	$ 0.75	See Note 1
# of TN customers (whole year)	5,435	
# of years	4.25	Calculated as 63 months/12 minus the first year
Subtotal months 13-63	$ 17,324	
Expense costs (months 13-63)	$ 0.25	See Note 1
# of TN customers (average)	453	Calculated as # of customers from test year/12 months
Monthly expenses	$ 113	

Value of capital asset by August 2013	$ 22,759
Annual ongoing compliance	$ 1,359

* Information is the sum of actual customers from the test year from the Flow tab of the Revenue calculation spreadsheet maintained by Thomas Hartline, President of Navitas.

Note 1: For the first 12 months of the contract, the entire $1 per customer is attributed to expenses that qualify for capitalization. From months 13-63, $0.75 of each $1.00 relates to the initial documentation, as discussed in Section 2, paragraphs 1-4; $0.25 of each $1.00 relates to the annual testing to maintain the plans, as discussed in Section 2, paragraphs 5-7, and are therefore considered are not attributed to the value of the initial documentation (i.e. not part of the value to put the asset in service).

The $0.25 discussed in paragraphs 5-7 of Section 2 are attributed to the value of the initial documentation because the first annual test actually acts as a test of the initial documents to determine whether they are ready to be used and useful. Such initial testing would be similar to testing a machine before placing it in service, and such testing would not be maintenance, but rather would be capitalized as a necessary cost to put the asset into service.

Note 2: If the ongoing annual testing is treated as an expense rather than capitalized as set forth in Schedule 4.A.3 in Settlement Exhibit A, then the imputed interest for the service-provider financing needs to be calculated and capitalized as well. Such imputed interest would reduce the expense amount and increase the value of the capital asset by August 2013 under any method of calculation (i.e. actual customers or minimum required payments).

Appendix B

NAVITAS TN NG, LLC
INDEX TO SCHEDULES
For the 12 Months Ending December 31, 2013

	Schedule
Results of Operations	1
Average Rate Base	2
Adjustments to Rate Base	2.A
Comparative Rate Base	3
Income Statement at Current Rates	4
Navitas TN Expense Adjustments	4.A
NUC Expense Adjustments	4.A.1
Depreciation Expense	4.A.2
Amortization Expense	4.A.3
NUC Labor	4.A.4
Allocation Percentage Calculation	4.A.5
Calculation of Inflation	4.A.6
Comparative Income Statement at Current Rates	5
Margin & Revenue Summary at Current Rates	6
Taxes Other than Income Income Taxes	7
Excise Taxes at Current Rates	8
Income Statement at Proposed Rates	9
Rate of Return Summary	10
Revenue Conversion Factor	11

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Results of Operations
For the 12 Months Ending December 31, 2013

Line No.		Settlement	Company E/	Difference
1	Rate Base	$ 805,304 A/	$ 1,490,326	$ -685,022
2	Operating Income At Current Rates	-194,077 B/	-97,000	-97,077
3	Earned Rate Of Return	-24.10%	-6.51%	-17.59%
4	Fair Rate Of Return	8.71% C/	9.20%	-0.49%
5	Required Operating Income	70,110	137,080	-66,971
6	Operating Income Deficiency	264,187	234,080	30,106
7	Gross Revenue Conversion Factor	1.004927 D/	1.666795	-0.661868
8	**Revenue Deficiency**	$ **265,488**	$ **390,164**	$ **-124,675**
	Analysis			
9	Total Revenue (Current Rates)	435,987.63 F/	484,183.00 F/	(48,195.37)
10	Increase in Total Revenue	61% G/	81% G/	-20%

A/ CAPD Exhibit, Schedule 2.
B/ CAPD Exhibit, Schedule 4.
C/ CAPD Exhibit, Schedule 10.
D/ CAPD Exhibit, Schedule 11.
E/ Company Filing. CAPD requests that Navitas files all documents provided to CAPD to the TRA to help ensure confidentical documents are not Indavertently filed.
F/ Settlement Exhibit, Schedule 5.
G/ This amount is the percentage increase to the customer's bills based on the PGA rate effective from the CAPD's test year of April 1, 2011 to March 31, 2012, calculated as Revenue Deficiency (Line 8) divided by Total Revenue (Current Rates) (Line 9).

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Average Rate Base
For the 12 Months Ending December 31, 2013

Line No.		Test Period A/	Adjustments B/	Attrition Period
	Additions:			
1	Utility Plant in Service	$ 1,755,227	$ 182,766	$ 1,937,993
2	Other Long-Term Assets	214,438	-174,255	40,183
3	Working Capital	37,578	-501 *	37,077
4	**Total Additions**	$ **2,007,243**	$ **8,010**	$ **2,015,253**
	Deductions:			
5	Accumulated Depreciation	$ 907,049	$ 73,719	$ 980,768
6	Accumulated Amortization of Other Long-Term Assets	19,257	-14,988	4,269
7	Acquisition Adjustment	251,338	-26,426	224,912
8	**Total Deductions**	$ **1,177,644**	$ **32,305**	$ **1,209,949**
9	**Rate Base**	$ **829,599**	$ **-24,295**	$ **805,304**

* Utility Plant in Service, Other Long Term Assets, Accumulated Depreciation, and Plant Acquisition Adjustment are from the Navitas TN NG Trial Balance as of 12/31/2011. The calculation for working capital in this Settlement is the "one-eighth method", which presumes that cash working capital necessary equals 1/8 (or 45 days/360 days) of the O&M expense, which is the NUC Crews charge on Schedule 4.A.

** Other Long Term Assets recorded in Navitas's financial statements

A/ Company Filing.
B/ CAPD Exhibit, Schedule 2.A.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, Issued December 19, 2012.***

NAVITAS TN NG, LLC
Adjustments to Rate Base
For the 12 Months Ending December 31, 2013

Line No.	Adjustments to Additions		
1	Reverse journal entry transfering meters to NUC from TN	9,000.00	A/
2	New Meters from 2011	3,990.00	B/
3	New Meters for 2012	1,976.00	B/
4	New Meters for 2013*	11,520.00	B/
5	2012 Non-meter Capital Expenditures	16,359.76	C/
6	2013 Non-meter Capital Expenditures*	8,568.38	C/
7	California Land	53,009.19	E/
8	California Building	58,729.90	E/
9	Eakley Land	1,845.22	E/
10	Eakley Building	17,767.32	E/
11	Other Long Term Assets	(174,255.38)	F/
12		8,510.39	
13			
14	**Adjustments to Deductions**		
15	Accumulated Depreciation increase for Meters in 2011	1,083.35	D/
16	Accumulated Depreciation increase for 2012 Depreciation	47,987.02	D/
17	Accumulated Depreciation increase for 2013 Depreciation*	24,541.36	D/
18	Amortization of the Acquisition Adjustment 2012 & 2013*	(26,425.64)	E/
19	Amortization of the Other Long Term Assets 2012 & 2013*	(14,988.06)	F/
20		32,198.03	

* The estimated acquistions and related depreciation and amortization for 2013 are reduced by half to arrive at the Average Rate Base on Schedule 2.A. The meters expected to be replaced in March 2013 are added in full since the replacement occurs in the first part of the year.

Notes:

A/ This amount reflects the reversal of a journal entry recorded to transfer the cores of the meters from TN's fixed assets to NUC's fixed asset, as shown and explained on CAPD Exhibit, Schedule 2.A.

B/ This amount reflects the acceleration of replacing meters, as shown and explained on CAPD Exhibit, Schedule 2.A.

C/ This amount reflects the estimated capital expenditures that are not related to meter replacement as calculated by the CAPD on CAPD Exhibit, Schedule 2.A.

D/ Accumulated Depreciation increase for 2012 and 2013 were calculated on the Depreciation Schedule, Schedule 4.A.2. This amount is also described in CAPD Exhibit, Schedule 2.A.

E/ See Depreciation Schedule, Schedule 4.A.2.

F/ See Amortization Schedule, Schedule 4.A.3.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Comparative Rate Base
For the 12 Months Ending December 31, 2013

Line No.		Settlement A/	Company B/	Difference
	Additions:			
1	Utility Plant in Service	$ 1,937,993	$ 2,443,206	$ -505,213
2	Other Long-Term Assets	40,183	27,300	12,883
3	Working Capital	37,077	37,866	-789
4	**Total Additions**	**$ 2,015,253**	**$ 2,508,372**	**$ -493,119**
	Deductions:			
5	Accumulated Depreciation	$ 980,768	$ 1,018,046	$ -37,278
6	Accumulated Amortization of Other Long-Term Assets	4,269	0	4,269
7	Acquisition Adjustment	224,912	0	224,912
8	**Total Deductions**	**$ 1,209,949**	**$ 1,018,046**	**$ 191,903**
9	**Rate Base**	**$ 805,304**	**$ 1,490,326**	**$ -685,022**

A/ CAPD Exhibit, Schedule 2.
B/ Company Filing.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Income Statement at Current Rates
For the 12 Months Ending December 31, 2013

Line No.			Test Period A/		Adjustments		Settlement Attrition Amount
	Operating Revenues:						
1	Gas Sales & Transportation Revenues	$	456,860	$	-28,667	$	428,193 B/
2	Other Revenues		27,323		-19,529		7,794 C/
3	**Total Revenue**	$	**484,183**	$	**-48,195**	$	**435,988**
	Operating & Maintenance Expenses:						
4	Purchased Gas Expense	$	224,324	$	-5,164	$	219,160 B/
5	Operations & Maintenance		302,949		55,586		358,535 D/
6	**Total Operating & Maintenance Expenses**	$	**527,273**	$	**50,423**	$	**577,696**
	Other Expenses:						
7	Depreciation & Amortization Expense	$	55,094	$	-13,636	$	41,458 D/
8	General Taxes		10,469		442		10,911 E/
9	State Excise Taxes		0		0		0 F/
10	Federal Income Taxes		0		0		0 G/
11	**Total Other Expenses**	$	**65,563**	$	**-13,194**	$	**52,369**
12	**Total Operating Expenses**	$	**592,836**	$	**37,229**	$	**630,065**
13	**Utility Operating Income**	$	**-108,653**	$	**-85,424**	$	**-194,077**

A/ Company Filing.
B/ CAPD Exhibit, Schedule 6.
C/ Navitas TN NG account # 4199, Penalties & Service Charges

12/31/2011:	$6,174.20
Less Q1 2011:	3,962.23
Add Q1 2012:	5,582.21
Total	$7,794.18

D/ CAPD Exhibit, Schedule 4.A.
E/ CAPD Exhibit, Schedule 7.
F/ CAPD Exhibit, Schedule 8.
G/ Federal Income Taxes are passed through to the owner's personal return.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, Issued December 19, 2012.***

NAVITAS TN NG, LLC
TN Expense Adjustments
For the 12 Months Ending December 31, 2013

	Company P&L 12/31/2011*	Deduct P&L 1/1/2011 to 3/31/2011*	Add P&L 1/1/2012 to 3/31/2012*	Company P&L 4/1/2012 to 3/31/2012	Settlement Adjustments	Settlement Adjusted Expenses for 4/1/2012 to 3/31/2012	Inflation (2012 & 2013) G/	Total Expenses
5900 Direct Costs								
5921 NUC-Crews	278,184.98	50,060.01	88,590.00	316,694.97	A/	A/		296,613.22 A/
5923 NUC-asset billing	15,447.65	2,173.75	4,977.00	18,250.90	(18,250.90) B/	-		-
5999 Depreciation	49,634.18	10,371.16	14,240.61	53,503.63	(17,648.54) C/	35,855.09		35,855.09
5999 Amortization					8,537.31 D/	8,537.31		8,537.31
6000 Overhead								
6300 Bank Fees	1,372.82	169.70	590.92	1,794.04		1,794.04	1.038	1,861.78
6408 Advalorem Tax Expense	6,976.83		1,740.00	8,716.83		8,716.83	1.038	9,045.95
6410 Lic, permit, member			1,920.00	1,920.00		1,920.00	1.038	1,992.49
6412 Postage-billing	1,152.95	263.13	352.82	1,242.64	(62.13) E/	1,180.51	1.038	1,225.08
6420 Tax consult & filing	53.15			53.15		53.15	1.038	55.16
6495 Bad debt	6,210.77		100.64	6,311.41	(4,000) F/	2,311.41	1.038	2,398.68
6496 Customer Discounts	523.60	291.51	477.45	709.54		709.54	1.038	736.33
	359,536.93			409,197.11	(31,424.26)	377,772.85		358,321.09

* Per Navitas's Quickbooks reports.

A/ The Settlement adjustments to the NUC-Crews expense amount to calculate the fair and reasonable expenses allocated to TN for the attrition year are shown on CAPD Exhibit, Schedule 4.A.1.

B/ To remove the expenses related to intercompany charges by NUC to TN for meter fees of $3.00 per meter. The meters should be recorded in TN's fixed assets and depreciated in TN's books. See Note B on Schedule 2.A.1.

C/ To adjust depreciation expenses for the meters and the expected 2012 and 2013 capital expenditures, as well as include the amortization of the Plant Acquisition Adjustment. See Schedule 4.A.2.

D/ To include amortization for organizational costs, the unamortized portion of the 2011 rate case expenses, and the 2012 rate case expenses. See Amortization Schedule, Schedule 4.A.3.

E/ To reduce the amount of Postage by the 5% markup amount erroneously applied to expenses directly charged from NUC to TN.

F/ Per review of the account details of account #6495, Bad Debt Expense,$6,178.96 of the expenses from 4/1/2011 to 3/31/2012 related to a write off of $6,178.96 to clean up of bad debt receivables that were on Gasco's books and probably should have been written off before the purchase by Navitas. Per review of the account details for 2012 and discussions with Navitas, the 2011 write off was an aberration. The Settlement adjusted this account so that the 2013 expenses would reflect the 2012 bad debt expense as of 11/16/2012 of $2,347.25, as annualized.

G/ Per Inflation Schedule, Schedule 4.A.6.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
NUC Expense Adjustments
For the 12 Months Ending December 31, 2013

	Company P&L 12/31/2011*	Deduct P&L 1/1/2011 to 3/31/2011*	Add P&L 1/1/2012 to 3/31/2012*	Company P&L 4/1/2012 to 3/31/2012	Settlement Adjustments for Indirect Costs	Settlement Allocation % to TN	Settlement Indirect Costs Allocable to TN	Settlement Adjustments for TN's Direct Costs	Inflation (2012 & 2013) O/	NUC charges to TN 12/31/2013
5099 Direct Costs										
5100 Services (labor)	1,678,951.19	388,595.49	413,886.71	1,704,242.41	(1,618,093) /A		86,149.20	75,788 A/	1.038	168,051
5100 Services (non labor)					110,654	9.23% N/	10,209.05		1.038	10,595
5300 Equipment	28,191.04	3,774.12	8,641.93	33,058.85	-	9.23%	3,050.04		1.038	3,165
5400 Construction	52,751.29	2,303.31	(15,748.85)	34,699.13	(34,699) /B	9.23%	-		1.038	-
5999 Depreciation	204,330.76	51,329.64	53,348.89	206,350.01	(45,292) /C	9.23%	14,859.37		1.000 X/	14,859
6100 General Expenses										
6110 Communication Equipment	3,089.19	261.55	760.40	3,588.04	-	9.23%	331.04		1.038	344
6120 Communication Services	48,590.39	9,935.51	13,502.14	52,157.02	-	9.23%	4,812.05		1.038	4,994
6130 Postage	13,776.32	4,744.75	2,431.96	11,463.53	(8,524) D/	9.23%	271.25		1.038	281
6140 Office Consummables	18,975.25	5,403.25	7,780.99	21,352.99	-	9.23%	1,970.04		1.038	2,044
6150 Travel & Subsistence	16,704.13	(2,996.33)	12,908.20	32,608.66	(31,769) E/	9.23%	77.50	6,560 E/	1.038	6,888
6200 Office Expenses										
6210 Payroll Expenses	388,543.48	105,951.03	100,757.07	383,349.52	(143,259) F/	9.23%	22,150.97	16,659 F/	1.038	40,275
6220 Facilities	50,817.02	9,219.63	7,604.34	49,201.73	(28,695) G/	9.23%	1,891.95		1.038	1,963
6230 Utilities	28,809.94	5,286.21	5,149.72	28,673.45		9.23%	2,645.44		1.038	2,745
6232 Equipment Leasing	989.07	(2,451.27)	853.73	4,294.07	(372) H/	9.23%	361.85	372 H/	1.038	762
6241 Contracted Transportation	117,856.44	31,282.60	22,613.56	109,187.50	(109,187) I/	9.23%	0.05		1.038	0
6242 Fuel	190,740.92	37,755.55	43,848.19	196,833.56	(69,912) I/	9.23%	11,709.85		1.038	12,152
6240 Transportation - Other	104,279.95	24,532.33	27,013.84	106,761.46	(66,916) J/	9.23%	3,676.18		1.038	3,815
6320 Bank Fees	3,802.20	1,000.50	1,180.52	3,982.22		9.23%	367.40		1.038	381
6400 Business Expenses										
6410 Licenses, permits, membershi	11,783.71	4,982.41	5,385.39	12,186.69		9.23%	1,124.35		1.038	1,167
6420 Tax Consult& Filing	24,680.00		2,750.00	27,430.00		9.23%	2,530.71		1.038	2,626
6425 Legal	21,021.02	(9,900.17)	54,169.12	85,090.31	(72,765) K/	9.23%	1,137.13		1.038	1,180
6440 Bonds & Insurance	91,620.32	26,165.41	23,230.49	88,685.40		9.23%	8,182.19		1.038	8,491
6445 Safety & Security	52,658.10	13,244.43	10,877.73	50,291.40		9.23%	4,639.93		1.038	4,815
6460 Company promotions	2,057.93	378.88	95.38	1,774.43		9.23%	163.71		1.038	170
6471 Education	10,711.92	2,915.62	4,820.41	12,616.71		9.23%	1,164.03		1.038	1,208
6470 Seminars & Subscriptions	6,913.95	103.00	213.49	7,024.44		9.23%	648.08		1.038	673
6475 Employee incentives	1,600.00	600.00		1,000.00		9.23%	92.26		1.038	96
6799 Penalties & Fines	1,375.75	263.49	1,934.57	3,046.83	(3,047) L/	9.23%	-		1.000 X/	-
6510 New Opportun & Methods	30,000.00	7,500.00	7,500.00	30,000.00	M/	9.23%	2,767.82		1.038	2,872
	3,205,621.28	722,180.84	817,509.92	3,300,950.36	(2,121,875.40)		186,983.44	99,378.69		296,613

* Per Navitas's Quickbooks reports.

A/ Settlement took the $1,593,588 in employee and outside labor and allocated labor to TN, which is shown on Labor, Schedule 4.A.4. The remainder of the charges of $110,654 were for uniform services that had memos of the location incurring the costs of the uniform services as well as monthly charges to Volunteer Trenching to be available for back up services. These non-labor charges will be considered for tracking directly to the benefiting system for future rate cases.

B/ The charges to this account are primarily expenses that are later capitalized to specific systems. The balance in this account reflects the timing differences between the expense and the time of capitalization. It is essentially a CWIP account that can apply to any of the systems. The Settlement reduces the indirect allocation costs for CWIP and estimated expected capital expenditures for Tennessee in Schedule 2 and 2.A. Per the terms of the Settlement, the charges to this account will be considered for tracking costs directly to the benefiting system in separate accounts.

C/ To remove the depreciation expense related to meters in the entirety from the indirect allocations and add the estimated depreciation expenses for the meters in Tennessee expected for 2013 (per the Depreciation Schedule, Schedule 4.A.2.)

D/ All postage is charged first to NUC then charged to the systems at a 5% markup. The individual states are charged for the postage for sending out customer bills. The Settlement eliminated the 5% markup for TN in Schedule 4.A. The annual expense of $11,463.53 equals $955 in monthly expenses. The Settlement's adjustment results in approximately $2940 per year in Postage expenses for NUC ((100 stamps * $0.45 * 52 weeks) + ($50 Priority/Non-envelope shipping * 12 months)).

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

E/ The Settlement includes recovery for the work travel based on the planned trips in 2013:
- Walker and Cash (TN labor) training for 2 days (direct cost) and
- 2 California employees attending a 3-day training on utility accounting (indirect).

The Settlement assumed expenses of $140 daily for lodging and subsistence for the planned trips, the direct costs to TN are $6,680, and the indirect costs for the utility accounting training is $1,420. The Settlement also includes in the estimate quarterly trips for Hartline, at approximately $1,500 per trip to include travel, per diem hotel and meals, and car rental. Air and mileage are expensed in a separate account. Air travel was included for Hartline because his monthly travel expenses of $2,500 were eliminated from Transportation - Other, account #6240.

F/ This account reflects employee healthcare. The Settlement reduced the indirect costs by 37.37% of the test year expenses to reflect the approximate healthcare costs associated with the employees dedicated to Oklahoma and Kentucky. The 37.37% was derived from reviewing the employee expenses on Labor Schedule, Schedule 4.A.4. CAPD also reclassified the healthcare related to TN's labor from Indirect Costs to the costs directly allocable to TN.

G/ The Facilities expenses reduced significantly because the California office originally rented facilities but then purchased office space. The Settlement adjusted the annual expenses to reflect these expected savings for 2013.

H/ This account has three monthly charges: (1) $158 to Pitney Bowes for the postage machine (billing); (2) $13 to Airgas for equipmenet leased at the Eakely, Oklahoma location; and (3) $31 to Holston for equipmenet leased and dedicated to the Jellico, Tennessee operations. The Settlement Reclassified the Holston charges to direct charges to TN.

I/ This account is entirely plane expense, which the Settlement disallows for recovery through rates. Reasonable and prudent travel expenses have been estimated and included in the Travel and Subsistence adjustments. See E.

J/ This account includes the fuel for the trucks, which is allowed for rate recovery, as well as the disallowed expenses for plane fuel and fuel used for personal purpose. The Settlement disallowed the costs associated with the plane using adjustments in CAPD Exhibit, Schedule 4.A.1. Because some trucks are dedicated to certain systems, some or all the costs charged to this account should be considered for direct cost tracking for future rate cases.

K/ This account includes expenses for the trucks, which is an allowable expenses as well as expenses of $2500 to two executive officers ($5000 total). The Settlement adjusted this account based on CAPD adjustments in CAPD Exhibit, Schedule 4.A.1. Because some trucks are dedicated to certain systems, some or all the costs charged to this account should be considered for direct cost tracking for future rate cases.

L/ This account is for late fees and other fines and penalties. Such charges are not permitted for recovery through rates because the rates for 2013 are expected to permit the company to avoid penalties and fines.

M/ Per CAPD Exhibit, Schedule 4.A.1, this account reflects monthly charges of $2500 for a consultant to advise Navitas about utility practices.

N/ This percentage is the allocation percentage calculated, as shown on CAPD Exhibit Allocation Percentage Calculation, Schedule 4.A.5.

O/ Inflation amounts are from CAPD Exhibit, Schedule 4.A.6. Also available in Settlement Exhibit, Schedule 4.A.6.

X/ Inflation adjustments do not apply to these accounts.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, Issued December 19, 2012.***

Navitas TN NG, LLC
Depreciation Expense
For the 12 Months Ending December 31, 2013

Source: 2012 3rd Quarter Depreciation Schedules from Joey Irwin	Acq Date	Life	Cost basis	Tennessee Allocation	Settlement Calculation: 2012 Depreciation Expense (annualized)	Settlement Calculation: 2013 Depreciation Expense
Mains (NARUC acct #376)						
Byrdstown & County	12/31/10	480	550,595.00	550,595.00	$ 13,764.88	$ 13,764.88
Fentress County	12/31/10	480	3,018.00	3,018.00	$ 75.45	$ 75.45
Jellico System	12/31/10	480	1,183,700.00	1,183,700.00	$ 29,592.50	$ 29,592.50
Total 1774			1,737,313.00	1,737,313.00	$ 43,432.83	$ 43,432.83
Rebuild Byrdstown Odorant Sys	01/01/11	240	15,000.00	15,000.00	$ 750.00	$ 750.00
Total 1771			15,000.00	15,000.00	$ 750.00	$ 750.00
Services (NARUC acct #380)						
Service - McCreaty; McCreaty; Veach	10/31/11	480	1,286.25	1,286.25	$ 32.16	$ 32.16
Service - Delk; Stevens	11/30/11	480	892.50	892.50	$ 22.31	$ 22.31
Service - Chitwood	12/31/11	480	735.00	735.00	$ 18.38	$ 18.38
Service - Pickett County Visitor Center	01/31/12	480	5,421.76	5,421.76	$ 135.54	$ 135.54
Service - Jellico Elementary	03/31/12	480	2,600.85	2,600.85	$ 65.02	$ 65.02
Service - David Creekmore	04/30/12	480	525.00	525.00	$ 13.13	$ 13.13
Service - Jellico Hospital	05/31/12	480	598.50	598.50	$ 14.96	$ 14.96
Service - Etter Baptist Church.	05/31/12	480	2,001.30	2,001.30	$ 50.03	$ 50.03
Service - Glen Parris	07/31/12	480	507.41	507.41	$ 12.69	$ 12.69
Service - Robert Johnson	08/30/12	480	615.00	615.00	$ 15.38	$ 15.38
Total 1772			15,183.57	15,183.57	379.59	379.59
Subtotal			1,767,496.57	1,767,496.57	44,562.41	44,562.41
Acquisition adjustment						
Acquisition Adjustment - Jellico	12/31/10	240	(44,840.00)	(44,840.00)	$ (2,242.00)	$ (2,242.00)
Acquisition Adjustment - Byrdstown	12/31/10	240	(219,120.00)	(219,120.00)	$ (10,956.00)	$ (10,956.00)
Total 1777			(263,960.00)	(263,960.00)	(13,198.00)	(13,198.00)
Acquisition balancing entry	06/30/11	240	(592.86)	(592.86)	$ (29.64)	$ (29.64)
Total 1778			(592.86)	(592.86)	(29.64)	(29.64)

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		Acq Date	Life	Cost basis	Tennessee Allocation		2012 Depreciation Expense (annualized)	2013 Depreciation Expense
CAPD Adjustments to Navitas TN NG, LLC's Asset Listing								
TN	2011 Meter Cores	01/01/11	120	9,000.00	9,000.00		900.00	900.00
	2011 Meters*	06/01/11	120	2,014.00	2,014.00		201.40	201.40
	2011 Meters*	09/01/11	120	1,976.00	1,976.00		197.60	197.60
	2012 Meters*	04/01/12	120	1,976.00	1,976.00		148.20	197.60
	2013 Meters*	03/01/13	120	11,520.00	11,520.00		N/A	960.00
	2012 other cap ex 4th Quarter	11/15/12	480	4,089.94	4,089.94		17.04	102.25
	2013 other cap ex**	06/30/13	480	17,136.76	17,136.76		N/A	
California	Land - 3186D Airway Blvd, Costa Mesa	06/30/11		547,200.00	50,485.13	A/		
	Land - Closing cost on property	06/30/11		27,357.91	2,524.06	A/		
	Value of building improvements 4800sf * $50	06/30/11	468	240,000.00	22,142.60	A/	567.76	567.76
	Improvements in 2011	12/31/11	468	335,870.90	30,987.73	A/	794.56	794.56
	Improvements in 2012 Q1	03/31/12	468	54,392.82	5,018.33	A/	128.68	128.68
	Improvements in 2012 Q2	06/30/12	468	6,300.00	581.24	A/	14.90	14.90
Eakley	Land - Eakly	07/28/09		40,000.00	1,845.22	B/		
	Eakly Structure	07/28/09	468	12,501.70	576.71	B/	14.79	14.79
	LI - Eakly reconstr L	09/30/09	468	24,311.25	1,121.49	B/	28.76	28.76
	LI - Closing costs	10/01/09	468	1,346.75	62.13	B/	1.59	1.59
	LI - Eakly reconstr M&S	10/31/09	468	2,378.01	109.70	B/	2.81	2.81
	LI - Eakly reconstr L&E	10/31/09	468	16,090.88	742.28	B/	19.03	19.03
	LI - Eakly reconstr L&E	11/30/09	468	15,025.13	693.12	B/	17.77	17.77
	LI - Eakly reconstr L&E	12/31/09	468	32,997.00	1,522.17	B/	39.03	39.03
	LI - Eakly reconstr M&S	12/31/09	468	35,895.26	1,655.86	B/	42.46	42.46
	LI - Eakly reconstr L,E,M&S	01/31/10	468	21,878.74	1,009.28	B/	25.88	25.88
	LI - Eakly reconstr L,E,M&S	02/28/10	468	13,107.00	604.63	B/	15.50	15.50
	LI - Eakly reconstr L,E,M&S	03/31/10	468	65,315.10	3,013.01	B/	77.26	77.26
	LI - Eakly reconstr L,E,M&S	04/30/10	468	8,209.73	378.72	B/	9.71	9.71
	LI - Eakly reconstr L,E,M&S	05/31/10	468	15,725.70	725.43	B/	18.60	18.60
	LI - Eakly reconstr L,E,M&S	06/30/10	468	40,070.65	1,848.48	B/	47.40	47.40
	LI - Eakly reconstr L,E,M&S	10/01/10	468	3,153.95	145.49	B/	3.73	3.73
	LI - Eakly reconstr L,E,M&S	10/01/10	468	20,179.66	930.90	B/	23.87	23.87
	LI - Eakly reconstr L,E,M&S	10/31/10	468	3,955.43	182.47	B/	4.68	4.68
	LI - Eakly reconstr L,E,M&S	11/30/10	468	6,943.76	320.32	B/	8.21	8.21
	LI - Eakly reconstr L,E,M&S	12/31/10	468	1,531.72	70.66	B/	1.81	1.81
	LI - Eakly reconstr L,E,M&S	01/31/11	468	5,447.68	251.30	B/	6.44	6.44
	LI - Eakly reconstr L,E,M&S	02/28/11	468	3,499.68	161.44	B/	4.14	4.14
	LI - Eakly reconstr L,E,M&S	03/31/11	468	1,436.69	66.28	B/	1.70	1.70
	LI - Eakly reconstr L,E,M&S	04/30/11	468	825.98	38.10	B/	0.98	0.98
	LI - Eakly reconstr L,E,M&S	05/31/11	468	479.75	22.13	B/	0.57	0.57
	LI - Eakly reconstr L,E,M&S	06/30/11	468	1,057.52	48.78	B/	1.25	1.25
	LI - Eakly reconstr L,E,M&S	07/31/11	468	264.87	12.22	B/	0.31	0.31
	LI - Eakly reconstr L,E,M&S	09/30/11	468	613.54	28.30	B/	0.73	0.73
	LI - Eakly reconstr L,E,M&S	10/31/11	468	565.72	26.10	B/	0.67	0.67
	LI - Eakly reconstr L,E,M&S	11/30/11	468	1,784.91	82.34	B/	2.11	2.11
	LI - Eakly reconstr L,E,M&S	12/01/11	468	22,207.50	1,024.44	B/	26.27	26.27
	LI - Eakly reconstr L,E,M&S	12/31/11	468	2,224.99	102.64	B/	2.63	2.63
	LI - Eakly reconstr L,E,M&S	01/31/12	468	1,389.65	64.11	B/	1.64	1.64
	LI - Eakly reconstr L,E,M&S	02/29/12	468	623.63	28.77	B/	0.68	0.74
	LI - Eakly reconstr L,E,M&S	05/31/12	468	2,114.63	97.55	B/	1.46	2.50
				1,683,988.49	179,064.32		3,424.60	4,520.32
Totals (Net of Acquisition Adjustments)				3,186,932.20	1,682,008.03		34,759.38	35,855.09

Note: The Company calculates a full month of depreciation for the month of acquisition.

* Per discussion with CAPD Exhibit, Schedule 4.A.2, 157 meters had been replaced by 11/17/2012. Hartline indicated that approximately a third of the total meters were replaced in June 2011, September 2011, and April 2012. Hartline also indicated that 200 meters were scheduled to be replaced in March 2013. For further information, see Note B on CAPD Exhibit, Schedule 2.A, Adjustments to Rate Base.

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The Settlement assumes the acquisitions will occur throughout the year. To reflect this, CAPD chose the mid-year acquisition date of 6/30/2013.

A/ These costs are for the land and building, including leasehold improvements, for the California location where management and other administrative duties are performed. For settlement purposes, the property was allocated using CAPD blended allocation in CAPD Exhibit A, Schedule 4.A.5 of 9.23% because the services performed at this location go beyond customer service duties. Also for settlement purposes, the useful life used was 39 years.

B/ These costs are for the land and building, including leasehold improvements, for the California location where management and other administrative duties are performed. This building is approximately 7,000 square feet with approximately half of it being used to rebuild meters. The space for meters was removed from the cost basis for allocation because the costs to build meters are a capitalized cost. The other half of the building has four private offices, three open workspaces, bathrooms, and a conference room. Three of the four private offices are used by managemerial or operations employees. One of the private offices is used by a customer service representative as well as the three open workspaces. The conference room is used primarily for managerial and administrative purposes. For settlement purposes, the property was allocated using CAPD blended allocation in CAPD Exhibit A, Schedule 4.A.5 of 9.23% because the services performed at this location go beyond customer service duties. Also for settlement purposes, the useful life used was 39 years.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

Navitas TN NG, LLC
Amortization Expense
For the 12 Months Ending December 31, 2013

Source: 2012 3rd Quarter Depreciation Schedules from Joey Irwin

	Acquisition Date	Life (months)	Cost Basis	Accumulated Amortization as of 12/31/2011	Unamortized balance as of 12/31/2011	
Org Costs						
80% of legal cost of Gasco acq	12/31/10	120	72,400.00	7,843.33	64,556.67	
20% of legal cost of Gaso acq Q1 '11	03/31/11	120	6,220.00	518.33	5,701.67	
NUC expense for TN transaction	03/31/11	120	91,575.00	7,631.25	83,943.75	
Legal Services for GASCO closing	06/30/11	120	9,132.38	532.72	8,599.66	
Total 1881			179,327.38	16,525.64	162,801.74	A/
Rate Case						
Legal Services for Rate Tariff	06/30/11	60	5,750.33	670.87	5,079	
Legal Services for Rate Tariff	07/31/11	60	6,608.28	660.83	5,947	
Legal Services for Rate Tariff	08/31/11	60	7,196.79	599.73	6,597	
Legal Services for Rate Tariff	09/30/11	60	6,586.13	439.08	6,147	
Legal Services for Rate Tariff	10/31/11	60	6,092.63	304.63	5,788	
Legal Services for Rate Tariff	11/30/11	60	479.85	16.00	464	
Legal Services for Rate Tariff	12/31/11	60	2,396.84	39.95	2,357	
Total 1882			35,110.85	2,731.08	32,379.77	B/

2013 Amortization

	Acquisition Date	Life (months)	Unamortized balance as of 1/1/2013		Monthly	2013 Amortization Expense
Rate Case						
Legal fees to obtain 25-yr Franchise Agmt	04/26/12	300	7,183	E/	23.94	287.31
Estimated Legal Services for 2012 Rate Case	12/31/12	48	33,000.00	C/	687.50	8,250.00
Total 1882			40,182.85		687.50	8,537.31

Note: The Company calculates a full month of amortization for the first month the capitalized expense is amortized.

A/ The Settlement reduced rate base and adjusted the accumulated depreciation on Schedule 2.A to reflect the elimination of these investor expense.

B/ The Settlement reduced rate base and adjusted the accumulated depreciation on Settlement Exhibit, Schedule 2.A.1 to reflect the elimination of these non-recurring expense.

C/ Navitas did not include any rate case expense in its petition. The Settlement adjusted rate case expense based on estimated expenses. See CAPD Exhibit, Schedule 4.A.3.

D/ Although not included in these workpapers per TRA data request #5, the DIMP asset was calculated for the settlement exhibits as follows:

Minimum monthly payments	$4,000
x Minimum number of payments	63
x Tennessee customer allocation	10.7%
Tennessee DIMP Asset	$26,964

Minimum monthly payments calculated per the contract is $1 per customer, with a minimum of 4,000 customers. Minimum number of monthly payments is also according to the contract. The Tennessee customer allocation is based on Navitas's petition. Since the number of customers will vary each month, and according to the Quickbooks report showing that Tri-Star has only charged Navitas $4,000 per month, any amount above the minimum payment is uncertain at the time of this rate case.

E/ These costs relate to the legal fees Navitas incurred to renew the Franchise Agreement for an additional 25 years.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

*** CONFIDENTIAL INFORMATION***

12-00058
Data Response - TRA Data Request
Schedule 4.A.4

NAVITAS TN NG, LLC
NUC Labor
For the 12 Months Ending December 31, 2013

Employee Labor Directly Allocable to TN	$ 45,787.57	D/
Outside Labor Directly Allocable to TN	$ 30,000.00	E/
Employee Labor Indirectly Allocable to TN	$ 914,694.47	=F-D
Employee Labor Not Allocable to TN	$ 573,106.14	G/
Outside Labor Not Allocable to TN	$ 30,000.00	E/
Total	$1,593,588.18	H/

Indirect Labor Breakdown - I/			TN %		TN Portion
Shared Services	90%	$ 827,674.85	9.23%	J/	76,361.97
Customer Services	10%	$ 91,469.45	10.7%		9,787.23
	100%				86,149.20

	Employee Name	ID	Location	Total Earnings - 2011*		Description	Applicable to TN?	Amount applicable to TN		Amount not allocable to TN	
1	[redacted]	[redacted]	[redacted]	[redacted]		Shared	Yes	[redacted]	1	[redacted]	
2	[redacted]	[redacted]	[redacted]	[redacted]		Shared	Yes	[redacted]	1	[redacted]	
3	[redacted]	[redacted]	[redacted]	[redacted]		Shared	Yes	[redacted]	1	[redacted]	
4	[redacted]	[redacted]	[redacted]	[redacted]		Shared	Yes	[redacted]	1	[redacted]	
5	[redacted]	[redacted]	[redacted]	[redacted]		Shared	Yes	[redacted]	1	[redacted]	
6	[redacted]	[redacted]	[redacted]	[redacted]		Accounting	Yes	[redacted]	1	[redacted]	
7	[redacted]	[redacted]	[redacted]	[redacted]		Shared	Yes	[redacted]	1	[redacted]	
8	[redacted]	[redacted]	[redacted]	[redacted]		Shared	Yes	[redacted]	1	[redacted]	
9	[redacted]	[redacted]	[redacted]	[redacted]		Customer Service	Yes	[redacted]	2	[redacted]	
10	[redacted]	[redacted]	[redacted]	[redacted]		General Manager	Yes	[redacted]	1	[redacted]	
11	[redacted]	[redacted]	[redacted]	[redacted]		Shared Services (monitors line loss)	Yes	[redacted]	1	[redacted]	
12	[redacted]	[redacted]	[redacted]	[redacted]		Billing Manager/Cust Svc	Yes	[redacted]	2	[redacted]	
13	[redacted]	[redacted]	[redacted]	[redacted]		Customer Service	Yes	[redacted]	2	[redacted]	
14	[redacted]	[redacted]	[redacted]	[redacted]		Shared services (Ops Mgr)	Yes	[redacted]	1	[redacted]	
15	[redacted]	[redacted]	[redacted]	[redacted]		Shared services (acctg)	Yes	[redacted]	1	[redacted]	
16	[redacted]	[redacted]	[redacted]	[redacted]		Tennessee	Yes	[redacted]		[redacted]	
17	[redacted]	[redacted]	[redacted]	[redacted]		Meters (capital) (2 wks/yr for TN)	No	[redacted]		[redacted]	
18	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
19	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
20	[redacted]	[redacted]	[redacted]	[redacted]		Meters (capital) (2 wks/yr for TN)	No	[redacted]		[redacted]	
21	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
22	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
23	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
24	[redacted]	[redacted]	[redacted]	[redacted]		Meters (capital) (2 wks/yr for TN)	No	[redacted]		[redacted]	
25	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
26	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
27	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
28	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
29	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
30	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
31	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
32	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
33	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
34	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
35	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
36	[redacted]	[redacted]	[redacted]	[redacted]		Oklahoma	No	[redacted]		[redacted]	
37	[redacted]	[redacted]	[redacted]	[redacted]		60% Oklahoma, 40% shared	40%	[redacted]	1	[redacted]	
	Total Employee Labor for 2011			$1,513,532.38				$ 947,921.14	62.63% A/	$ 565,611.24	37.37%
Deduct:	Employee Labor for 1/1/2011 to 3/31/2011			$ (443,233.40)	B/			$ (277,595.85)	A*B	$ (165,637.55)	
Add:	Employee Labor for 1/1/2012 to 3/31/2012			$ 463,289.20	C/			$ 290,156.74	A*C	$ 173,132.46	
	Total Employee Labor for 4/1/2011 to 3/31/2012			$1,533,588.18				$ 960,482.04	F/	$ 573,106.14	G/
	Total Outside Labor for 4/1/2011 to 3/31/2012			$ 60,000.00	E/						
				$1,593,588.18	H/						

* These earnings are from the Paychex payroll report from 1/1/2011 to 12/31/2011.

A/ This is the percentage of total salaries of employees who do any work for Tennessee that is not capitalized. CAPD did not receive the Q1 2012 Paychex salary report with the exact salary expense of each employee from 1/1/2012 to 3/31/2012. CAPD multiplied the percentage of 2011 salaries by the salaries related to Q1 2011 and Q1 2012 as an estimate of the salaries applicable to Tennessee. The same type of calculation was used to calculate the labor that is not allocable to TN.

B/ Sum of Paychex charges to NUC account # 5100, Services, for the period 1/1/2011 to 3/31/2011.

C/ Sum of Paychex charges to NUC account #5100, Services, for the period 1/12012 to 3/31/2012.

D/ This labor reflects the salary of Jerry Walker, who is dedicated to TN, as increased by 4.52%, which is the amount of the increase in Q1 2012 labor from Q1 2011 labor.

E/ This labor reflects 50% of the payments to Frank Cash from 4/1/2011 to 3/31/2012. Navitas started paying Cash on 7/1/2011 approximately $5000 per month. Cash's time is split 50/50 between Tennessee and Kentucky. Cash did not start until July 2011, so the annual amount of his fees would be $60,000, half of which would be directly charged to Tennessee

F/ This is the total indirect employee and outside labor allocable to TN. It was calculated by taking the total allocable labor less the labor that should be directly charged to TN.

G/ This portion of labor is dedicated to Oklahoma and therefore is not included in the Tennessee revenue requirement.

H/ This is the total labor costs for 4/1/2011 to 3/31/2012, as adjusted to annualize the outside labor to a full 12 months of Frank Cash's services ($5,000 per month).

I/ CAPD utilized two different allocation percentages to the indirect labor of $914,694.47. CAPD determined that the indirect labor was approximately 90% shared services and approximately 10% customer service based on the salaries and description of services provided by each employee. CAPD allocated the estimated customer service labor based on TN's percentage of customers and the shared services based on the blended allocation calculated in the Allocation Percentage Calculation, Schedule 4.A.5.

J/ CAPD utilized its shared services allocation calculated in Schedule 4.A.3 for non-customer driven labor.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Allocation Percentage Calculation
For the 12 Months Ending December 31, 2013

Line No.		Tennessee		Kentucky		Oklahoma		Total	
1	Gross Plant in Service*	1756	14.03%	1045	8.35%	9711	77.61%	12,512	100.00%
2	Customers**		10.70%					-	10.70%
3	Miles of Pipe***	34	2.94%	25	2.16%	1096	94.89%	1,155	100.00%
4	Sum of Allocations		27.68%		10.52%		172.51%		
5	Simple Average (÷3)		3		3		3		
6	**Allocation of NUC's O&M**		**9.23%**		**3.51%**		**57.50%**		**70.23%**

* Gross Plant in Service is in millions. It is unadjusted for any Acquisition Adjustments.
** Customer allocation is per Navitas's petition.
** Six customers in Tennessee are domestic tap customers spread along 30 miles of third-party pipe. The 34 miles of pipe shown for the calculation of the Tennessee's allocation is net of any pipes owned by a third-party because presumably the third-party would either maintain their own pipes or reimburse NUC for any expenses incurred to maintain third-party pipe.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Calculation of Inflation
For the 12 Months Ending December 31, 2013

	QUARTER				ATTR YR
YEAR	1/1 - 3/31	4/1 - 6/30	7/1 - 9/30	10/1 - 12/31	GDP IDP
2010	110.21	110.69	111.217	111.775	110.9730
2011	112.362	113.106	113.940	113.985	113.3483
AVERAGE GDP DEFLATOR FOR YEAR 2011					2.14%
					1.038 **A/**

Source: U.S. Department of Commerce, Bureau of Economic Analysis, Table 1.1.9 (Information available as of October 26, 2012).

A/ This number represents the GDP deflator compounded for 9 months of 2012 (April 2012 through December 2012) and 12 months in 2013.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Comparative Income Statement at Current Rates
For the 12 Months Ending December 31, 2013

Line No.		Settlement A/	Company B/	Difference
	Operating Revenues:			
1	Gas Sales & Transportation Revenues	$ 428,193	$ 456,860	$ -28,667
2	Other Revenues	7,794	27,323	-19,529
3	**Total Revenue**	$ 435,988	$ 484,183	$ -48,195
	Operating & Maintenance Expenses:			
4	Purchased Gas Expense	$ 219,160	$ 224,324	$ -5,164
5	Operations & Maintenance	358,535	302,949	55,586
6	**Total Operating & Maintenance Expenses**	$ 577,696	$ 527,273	$ 50,423
	Other Expenses:			
7	Depreciation Expense	$ 41,458	$ 55,094	$ -13,636
8	General Taxes	10,911	10,469	442
9	State Excise Taxes	0	-11,653	11,653
10	Federal Income Taxes	0	0	0
11	**Total Other Expenses**	$ 52,369	$ 53,910	$ -1,541
12	**Total Operating Expenses**	$ 630,065	$ 581,183	$ 48,882
13	**Utility Operating Income**	$ -194,077	$ -97,000	$ -97,077

A/ CAPD Exhibit, Schedule 4.
B/ Company Filing.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Margin & Revenue Summary at Current Rates
For the 12 Months Ending December 31, 2013

Line No.	Customer Class	Billing Determinant A/		Current Rate B/		Revenue
	Residential:					
1	Customer Charge	5,114	$	6.00	$	30,684
2	First 9 Ccf per Month	34,185		0.25		8,546
3	Commodity Charge (All Consumption)	182,578		0.40		73,031
4	**Total Residential Margin**				$	**112,261**
	Commercial:					
5	Customer Charge	902	$	6.00	$	5,412
6	First 9 Ccf per Month	6,174		0.25		1,544
7	Commodity Charge (All Consumption)	113,651		0.40		45,460
8	**Total Commercial Margin**				$	**52,416**
	Industrial:					
9	Customer Charge	126	$	6.00	$	756
10	First 9 Ccf per Month	981		0.25		245
11	Commodity Charge (All Consumption)	144,516		0.30		43,355
12	**Total Industrial Margin**				$	**44,356**
13	**Total Sales Margin**				$	**209,033**
14	**Gas Cost**	440,745	$	0.49725 **C/**	$	**219,160**
15	**Total Sales Revenue**				$	**428,193**

A/ The billing determinants differ slightly than the actual billing determinants. Per discussion with Navitas, the system that calculates the bills does not have the reporting capabilities to show the number of customers and the flow for each customer. Navitas tracks of the number of meters and the flow monthly. Navitas provided the number of meters and flow for the 12 months ended 3/31/2012 to CAPD. Per discussion with Navitas, there are a few customers with more than one meter, however the exact number is unknown. Since the flow per customer is also unknown, Navitas estimates revenue by taking the average flow per customer and, when that average is greater than 9 Ccf, assumes that each customer used at least 9 Ccf. Navitas recognizes that both of these variances of using meters instead of customers and using average flow instead of actual flow per customer may overstate the estimated revenue for
B/ Current Emergency Tariff Rates.
C/ Current PGA Rate.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Taxes Other than Income Income Taxes
For the 12 Months Ending December 31, 2013

Line No.		Settlement A/	Company B/	Difference
1	Property Taxes	$ 6,977	$ 6,977	$ 0
2	TRA Inspection Fee	1,920	1,920	0
3	Payroll Taxes	0	0	0
4	Franchise Tax	2,014	1,572	442
5	Gross Receipts Tax	0	0	0
6	Allocated & Other Taxes	0	0	0
7	**Total**	$ 10,911	$ 10,469	$ 442

A/ From Company's actual property tax bills for 2011 and the 2011 Franchise and Excise Tax Return.
B/ Company Filing.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Excise Taxes at Current Rates
For the 12 Months Ending December 31, 2013

Line No.		Settlement	
1	**Operating Revenues**	$ 435,988	A/
	Operating Expenses:		
2	O&M Expenses	$ 577,696	A/
3	Depreciation Expense	41,458	A/
4	General Taxes	10,911	A/
5	**Total Operating Expenses**	$ 630,065	
6	**NOI Before Excise and Income Taxes**	$ -194,077	
7	Less Interest Expense	35,087	B/
8	**Pre-tax Book Income**	$ -229,164	
9	**Excise Taxable Income**	$ 0	C/
10	Excise Tax Rate	6.50%	
11	**State Excise Tax Expense**	$ 0	

A/ CAPD Exhibit, Schedule 4.
B/ CAPD Exhibit, Schedule 10.
C/ Losses under current rates results in an Excise Taxable income of $0.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Income Statement at Proposed Rates
For the 12 Months Ending December 31, 2013

Line No.		Current Rates A/	Rate Increase	Proposed Rates
	Operating Revenues:			
1	Gas Sales & Transportation Revenues	$ 428,193	$ 265,488 B/	$ 693,682
2	Other Revenues	7,794	4,832 C/	12,627
3	**Total Revenue**	$ 435,988	$ 270,321	$ 706,308
	Operating & Maintenance Expenses:			
4	Purchased Gas Expense	$ 219,160	$	$ 219,160
5	Operations & Maintenance	358,535	1,433 D/	359,969
6	**Total Operating & Maintenance Expenses**	$ 577,696	$ 1,433	$ 579,129
	Other Expenses:			
7	Depreciation Expense	$ 41,458	$	$ 41,458
8	General Taxes	10,911		10,911
9	State Excise Taxes	0	4,701 E/	4,701
10	Federal Income Taxes	0		0
11	**Total Other Expenses**	$ 52,369	$ 4,701	$ 57,070
12	**Total Operating Expenses**	$ 630,065	$ 6,134	$ 636,199
13	**Utility Operating Income**	$ -194,077	$ 264,186	$ 70,109

A/ CAPD Exhibit, Schedule 4.
B/ CAPD Exhibit, Schedule 1.
C/ This amount was calculated by taking the change in operating revenue (B/) multiplied by the gross up factor for forfeited discounts on Schedule 11.
D/ This amount was calculated by taking the change in operating revenue (B/) multiplied by the gross up factor for uncollectibles on Schedule 11.
E/ This amount was calculated by taking the change in operating revenue that will result in operating income multiplied by the state excise tax factor on Schedule 11.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Rate of Return Summary
For the 12 Months Ending December 31, 2013

Line No.	Class of Capital	Settlement: Percent of Total	Settlement: Cost Rate A/	Settlement: Weighted Cost Rate A/
1	Short-Term Debt	4.26%	6.89%	0.29%
2	Long-Term Debt	67.50%	6.02%	4.06%
3	Common Equity	28.24%	15.40%	4.35%
4	**Total**	**100.00%**		**8.71%**

Line No.	Item	Amount
	Interest Expense Short-Term Debt:	
5	Rate Base	$ 805,304 **B/**
6	Short-Term Weighted Debt Cost	0.29%
7	**Short-Term Debt Interest Expense**	**$ 2,364**
	Interest Expense Long-Term Debt:	
8	Rate Base	$ 805,304 **B/**
9	Long-Term Weighted Debt Cost	4.06%
10	**Long-Term Debt Interest Expense**	**$ 32,724**
11	**Total Interest Expense**	**$ 35,087**

A/ Klein Exhibit, Page 2 of 16.
B/ CAPD Exhibit, Schedule 2.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
Revenue Conversion Factor
For the 12 Months Ending December 31, 2013

Line No.		Amount	Balance
1	Operating Revenues		1.000000
2	Add: Forfeited Discounts	0.018202 **A/**	0.018202
3	Balance		1.018202
4	Uncollectible Ratio	0.005302 **B/**	0.005399
5	Balance		1.012803
6	State Excise Tax	0.017484 **C/**	0.017708
7	Balance		0.995096
8	Federal Income Tax	0.000000 **D/**	0.000000
9	Balance		0.995096
10	Revenue Conversion Factor (Line 1 / Line 9)		**1.004927**

A/ CAPD calculated this ratio by taking Other Revenue, which reflects the revenue from penalties and service charges for the 12 months ended 3/31/2012 on Schedule 4.A, divided by Operating Revenues from Schedule 5, the Comparative Income Statement.
B/ CAPD calculated this ratio by taking the adjusted bad debt expense for the 12 months ended 3/31/2012 on Schedule 4.A, divided by Operating Revenues from Schedule 5, the Comparative Income Statement.
C/ State Excise Tax Rate of 6.50% based upon total revenue increase above $0 income.
D/ Federal Income Taxes are passed through to the owner's personal return.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***

NAVITAS TN NG, LLC
CAPD Proposed Margin Change
For the 12 Months Ending December 31, 2013

Line No.	Customer Class	Current Rates A/	Proposed Rates	Revenue Change	Percent Change
1	Residential	$ 112,261	$ 254,841	$ 142,580	127.01%
2	Commercial	52,416	118,988	66,572	127.01%
3	Industrial	44,356	100,692	56,336	127.01%
4	**Total Sales & Transportation Revenue**	**$ 209,033**	**$ 474,521**	**$ 265,488**	127.01%
5	Other Revenues	7,794	12,627	4,832	62.00%
6	**Total Revenues**	**$ 216,827**	**$ 487,148**	**$ 270,321 B/**	**124.67%**

A/ CAPD Exhibit, Schedule 6.
B/ CAPD Exhibit, Schedule 9.

*** This document varies from the Settlement Exhibits, as adjusted for TRA Data Request #5, issued December 19, 2012.***