



March 30<sup>th</sup>, 2014

Sharla Dillon  
Tennessee Regulatory Authority  
502 Deadrick St  
4<sup>th</sup> Floor  
Nashville, TN 37243-0505



Re: ACA filing

Dear Ms. Dillon,

Enclosed please find an original hard copy and two digital copies of the ACA filing for the Navitas TN NG, LLC Jellico and Byrdstown systems.

Navitas TN NG LLC is again requesting that the ACA for both systems be combined. We would prefer to have a single ACA and a single base PGA for the state of Tennessee. This is how we calculate the gas costs for the other states in which we operate.

The starting ACA in 2014 for the Jellico system was **positive \$4,638.67** and the ending balance for the year was **positive \$30,266.35** according to our calculations. In the Byrdstown/Fentress system our starting ACA in 2014 was **positive \$25,067.10** and the ending balance for the year was **positive \$44,978.87**. Based on the sales in the Jellico system, we project that the ACA will change from **0.00930** to **0.06459**. However, based on our sales in the Byrdstown system, we project that the ACA will change from **0.25170** to **0.37544**. We get frequent customer complaints from Byrdstown for the price being too high. There are only about 65 customers in the Byrdstown system and the under collected balance of \$44,978.87 comes out to an under collection of \$691.98 per customer. However, if the ACA for the two systems were combined to **\$75,245.22** and spread out across the entire usage in the state, the ACA would be about **0.12788** for the state.

If the TRA would allow Navitas TN NG to have a single ACA, then we would file to move the base PGA in both systems to the same number. Currently the base PGA in Jellico is **0.71624** and we are filing to move the base PGA to around **0.50000** as soon as possible. In Byrdstown the base PGA is currently **1.06854** and we are filing to move it to around **0.87000**. If we receive a single ACA we will change the base PGA to **0.62693** for the state. Combined with the **0.12788** ACA, the total PGA for the state would become **0.75481**. Without the single ACA and single PGA the rates will be around **0.56459** in Jellico and **1.24544** in Byrdstown

3186-D AIRWAY AVENUE COSTA MESA, CA 92626  
(714) 242-4064 (714) 850-0876 FAX

If you have any questions I can be reached at 714.242.4064 or [joey@navitasutility.com](mailto:joey@navitasutility.com).

Sincerely,



Joe Irwin Jr.

Nevitas TN NG  
Combined State  
ACA Leadsheet

Line	Commodity	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	TOTAL
1	Beginning Balance	75,245.22	73,046.37	62,501.01	61,634.08	53,171.27	54,304.54	53,634.95	51,825.95	47,736.20	43,441.79	39,339.88	13,556.54	75,245.22
2	Invoiced Gas Costs	83,557.62	71,996.24	57,849.43	25,072.88	15,570.10	9,942.00	8,554.57	5,619.09	6,754.98	10,972.18	31,879.04	41,112.35	368,880.47
	Gas Cost Recovery													
3	Cost Recovery-Sales Customers	71,394.16	68,709.65	48,908.06	27,983.02	12,111.66	8,935.01	8,726.24	8,175.79	9,279.82	12,613.20	47,952.62	44,093.24	368,882.47
4	ACA Refund/Surcharge	14,562.85	14,015.26	9,976.17	5,707.92	2,470.51	1,822.55	1,779.98	1,667.88	1,602.88	2,572.82	9,781.29	8,994.06	75,243.95
5	Ending Balance Before Interest	72,845.83	62,317.70	61,466.21	53,016.01	54,159.20	53,488.98	51,683.33	47,601.56	43,318.49	39,227.93	13,485.01	1,581.59	(0.74)
6	Average Monthly Balance	74,045.52	67,682.03	61,983.61	57,325.04	53,665.24	53,896.76	52,659.14	49,713.75	45,527.35	41,334.86	26,412.45	7,569.07	
7	Interest Rate	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	
8	Calculated Interest-Commodity	200.54	183.31	167.87	155.26	145.34	145.97	142.62	134.64	123.30	111.95	71.53	20.50	1,602.83
9	Ending Balance Including Interest	73,046.37	62,501.01	61,634.08	53,171.27	54,304.54	53,634.95	51,825.95	47,736.20	43,441.79	39,339.88	13,556.54	1,602.09	1,602.09

Line	Commodity	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	TOTAL
1	Beginning Balance	4,638.67	32,568.51	47,698.21	62,446.88	64,352.31	68,593.16	70,739.54	72,748.12	69,941.92	66,874.12	63,239.45	41,345.40	4,638.67
2	Invoiced Gas Costs	54,055.25	49,749.15	37,418.16	16,895.11	10,397.40	8,756.92	6,329.79	4,078.20	4,454.46	8,932.00	22,730.95	27,142.05	248,939.44
	Gas Cost Recovery													
3	Cost Recovery-Sales Customers	45,187.27	55,667.42	36,576.93	24,302.66	10,156.87	7,692.52	7,237.74	6,972.14	7,592.69	12,742.63	44,766.43	37,826.78	296,722.08
4	ACA Refund/Surcharge	(19,011.54)	(20,939.42)	(13,758.49)	(9,141.50)	(3,820.53)	(2,893.56)	(2,722.49)	105.22	114.59	0.00	0.00	491.16	(71,576.56)
5	Ending Balance Before Interest	32,518.19	47,589.66	62,297.93	64,180.83	68,413.37	70,551.12	72,554.08	69,748.96	66,689.10	63,063.49	41,203.97	30,169.51	28,432.59
6	Average Monthly Balance	18,578.43	40,079.09	54,998.07	63,313.86	66,382.84	69,572.14	71,646.81	71,248.54	68,315.51	64,968.81	52,221.71	35,757.46	
7	Interest Rate	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	
8	Calculated Interest-Commodity	50.32	108.55	148.95	171.48	179.79	188.42	194.04	192.96	185.02	175.96	141.43	96.84	1,833.76
9	Ending Balance Including Interest	32,568.51	47,698.21	62,446.88	64,352.31	68,593.16	70,739.54	72,748.12	69,941.92	66,874.12	63,239.45	41,345.40	30,266.35	30,266.35

Navitas TN NG  
Byrdstown/Fentress Division  
ACA Leadsheet

Line	Commodity	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	TOTAL
1	Beginning Balance	25,067.10	36,443.52	44,351.85	50,918.46	55,341.22	58,540.05	60,559.38	61,318.39	60,744.29	59,932.49	59,646.81	54,003.99	25,067.10
2	Invoiced Gas Costs	29,502.37	22,247.09	20,431.27	8,177.77	5,172.70	3,185.08	2,224.78	1,540.89	2,300.52	2,040.16	9,148.09	13,070.30	119,941.03
	Gas Cost Recovery													
3	Cost Recovery-Sales Customers	28,357.18	20,583.29	19,935.75	5,554.27	3,031.45	1,890.25	2,323.01	1,845.37	2,851.05	2,487.56	14,944.60	18,719.75	122,323.53
4	ACA Refund/Surcharge	(10,148.05)	(6,135.27)	(5,942.25)	(1,655.56)	(903.58)	(563.43)	(692.42)	434.69	624.47	0.00	0.00	4,409.53	(20,571.87)
5	Ending Balance Before Interest	36,380.34	44,242.59	50,789.62	55,197.52	58,386.04	60,398.32	61,153.57	60,579.22	59,769.29	59,485.10	53,850.30	44,845.01	43,256.47
6	Average Monthly Balance	30,713.72	40,343.06	47,570.74	53,057.99	56,863.63	59,469.19	60,856.47	60,948.80	60,256.79	59,708.79	56,748.55	49,424.50	
7	Interest Rate	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	3.25%	
8	Calculated Interest-Commodity	83.18	109.26	128.84	143.70	154.01	161.06	164.82	165.07	163.20	161.71	153.69	133.86	1,722.40
9	Ending Balance Including Interest	36,443.52	44,351.85	50,918.46	55,341.22	58,540.05	60,559.38	61,318.39	60,744.29	59,932.49	59,646.81	54,003.99	44,978.87	44,978.87