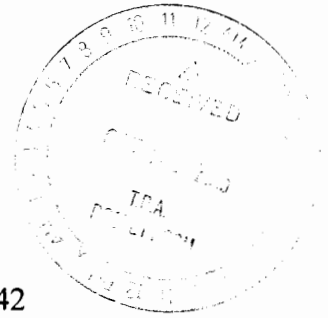


IN THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE



IN RE: )  
 )  
PETITION OF B&W PIPELINE, LLC ) DOCKET NO. 1500042  
FOR AN INCREASE IN RATES )

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**NAVITAS TN NG, LLC'S RESPONSE TO THE TENNESSEE REGULATORY  
AUTHORITY'S OCTOBER 7, 2015 DATA REQUEST**

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COMES NOW Navitas TN NG, LLC ("Navitas"), by and through undersigned counsel,  
and hereby serves this response to the Tennessee Regulatory Authority's (the "Authority")  
October 7, 2015 data request.

**DATA REQUESTS**

**REQUEST NO. 1:** Please reconcile the 60,411 MCF throughput volumes listed on Schedule 4  
Line 1 of the Company's Exhibits for the test period ending December 31,  
2014 to the 44,505 MCF gas sold to Navitas's customers listed in Navitas's  
most recent ACA Audit in Docket No. 15- 00040.

**RESPONSE:**

The 60,411 MCF figure is the amount of gas that B&W transported in 2014 and 44,517 MCF is the amount that Navitas sold to its customers. The difference is due to several factors. One factor is a leak in Albany Kentucky that was repaired mid-July. The second is the 10% allowed shrinkage in the B&W transport agreement. The third is the hot well gas. Since B&W uses the majority of the pipeline quality gas coming off of the Spectra line and replaces that usage with their well head gas which is more energy dense there is discrepancy in Navitas customers' usage measured in ccf and the MMBtu content of the gas they received. The customers' meters register less usage since the gas is richer. The btu/ccf factor on the spreadsheet is from Spectra. We do not know the btu/ccf factor for the well gas. Lastly, Navitas is unaware of who pays for the supply and the transport for the free consumers on the B&W line. If Navitas does pay for it than it would affect the line loss as well.

**REQUEST NO. 2:** Please reconcile the 49,937 MCF of Albany throughput volumes listed on B&W's Response to CAD Data Request No. 2 Question 21 Attachment C to the 32,525 MCF of Albany volumes listed in Navitas's most recent ACA Audit in Docket No. 15-00040.

**RESPONSE:**

**Please see attached PDF.**

**REQUEST NO. 3:** Separate the volumes listed on Schedule 4 Line 1 of B&W's Exhibits by individual location (Albany, Byrdstown, Fentress and Whitley County).

**RESPONSE:**

**Please see attached PDF. In 2014, there were no Whitley county customers outside of Albany. The Sales figures are from Navitas' billing system and the city gate usages and direct connect usage is provided by B&W. Please note the negative line loss in Brydstown and large positive loss on the direct connect customers. Even combining these figures provides a negative line loss on the Tennessee side of the B&W pipeline.**

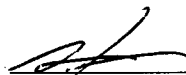
**REQUEST NO. 4:** Provide the specific geographic location (city and state) of the two expected new industrial customers.

**RESPONSE:**

**The two new industrial customers, both of whom are operating and taking gas, are located on the Albany systems, Cobb feed mill is in Albany proper, Keystone foods is located on Hwy 90 between Hwy 127 and Road 1590 (commonly called the Burkesville Road.**

Dated this the 21st day of October, 2015.

Respectfully submitted,



Klint Alexander (#20420)

V. Austin Shaver (#26581)

**BAKER DONELSON, BEARMAN, CALDWELL &  
BERKOWITZ, P.C.**

211 Commerce Street

Nashville, Tennessee 37201

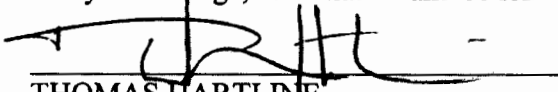
(615) 726-5600

[kalexander@bakerdonelson.com](mailto:kalexander@bakerdonelson.com)

**VERIFICATION OF NAVITAS TN NG, LLC**

STATE OF CALIFORNIA   )  
                                      )  
COUNTY OF ORANGE   )       ss:

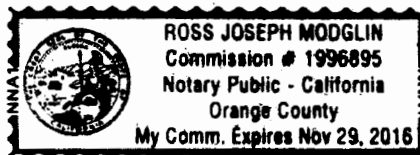
I, Thomas Hartline, Secretary of Navitas TN NG, LLC, being duly sworn according to law, makes oath and affirm that I have read the foregoing documentation, know the contents thereof, and that same is true and correct to the best of my knowledge, information and belief.

  
THOMAS HARTLINE

Subscribed and sworn to (~~or affirmed~~) before me on this 21st day of October, 2015, by Thomas Hartline, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

  
Notary Public Signature

Notary Public Seal

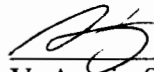


**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2015, a true and correct copy of the foregoing was served via U.S. Mail upon the following:

**Henry Walker, Esq.**  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, Tennessee 37203  
Herbert H. Slatery III  
Attorney General and Reporter  
State of Tennessee

**Rachel A. Newton, Esq.**  
Assistant Attorney General  
Office of the Tennessee Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207



\_\_\_\_\_  
V. Austin Shaver

	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	2014 Total
Sales in CCF													
Kentucky	64,645	57,100	39,619	21,756	10,368	9,992	9,567	8,522	9,690	17,492	32,516	44,100	
Tennessee	31,862	19,263	18,657	5,198	2,837	1,769	2,174	1,727	2,481	2,328	13,986	17,519	
Total:	96,507	76,363	58,276	26,954	13,205	11,761	11,741	10,249	12,171	19,820	46,502	61,619	44,517
Btu / CF	1,042	1,032	1,042	1,046	1,058	1,055	1,060	1,065	1,071	1,060	1,064	1,063	
Raw purchases in MMBtu	12,774.0	10,544.0	8,461.0	6,071.0	3,350.0	2,945.0	1,627.0	1,201.0	1,538.0	2,406.0	4,841.0	7,400.0	63,158
Line Loss													
plus deliveries	12,259	10,217	8,120	5,804	3,166	2,791	1,535	1,128	1,436	2,270	4,550	6,961	
less sales	9,651	7,636	5,828	2,695	1,321	1,176	1,174	1,025	1,217.10	1,982	4,650	6,162	
Line loss in MCF	2,608	2,581	2,292	3,109	1,846	1,615	361	103	219	288	(100)	800	
less transporter fuel - 1%	123	102	81	58	32	28	15	11	14	23	45	70	
Unaccounted for gas	2,486	2,479	2,211	3,051	1,814	1,587	345	92	205	265	(146)	730	15,118
1 Includes known leaks													
Line Loss %	25.8%	32.5%	37.9%	113.2%	137.4%	135.0%	29.4%	8.9%	16.8%	13.4%	-3.1%	11.8%	33.96%
Albany Sales	6,465	5,710	3,962	2,176	1,037	999	957	852	969	1,749	3,252	4,410	32,537
Albany City Gate Usage	9,323	8,170	6,874	5,517	3,028	2,706	1,453	1,051	1,239	2,135	3,593	4,848	49,937
	2,859	2,460	2,912	3,341	1,991	1,707	496	199	270	386	341	438	17,400
	44%	43%	74%	154%	192%	171%	52%	23%	28%	22%	10%	10%	53%
Byrdstown Sales	2,976	1,788	1,764	484	267	168	209	165	237	197	1,325	1,610	11,190
Byrdstown City Gate Usage	2,290	1,512	1,063	319	157	130	137	129	132	203	755	1,174	8,001
	(686)	(276)	(701)	(165)	(110)	(38)	(72)	(36)	(105)	6	(570)	(436)	(3,189)
	-23%	-15%	-40%	-34%	-41%	-22%	-34%	-22%	-44%	3%	-43%	-27%	-28%
Fentress Sales	210	138	101	36	17	9	8	8	11	36	73	142	790
Direct Connect Customers	428	635	201	102	26	13	13	15	474	58	165	341	2,471
	218	497	100	66	9	4	5	7	463	22	92	200	1,681
	104%	359%	98%	182%	52%	41%	57%	88%	4170%	61%	125%	141%	213%