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October 23, 2015

Mr. David N. Foster Chief, Utilities Division Tennessee Regulatory Authority 502 Deaderick Street, 4<sup>th</sup> Floor Nashville, TN 37243

Re: Docket No. 15-00042 – Petition of B&W Pipeline, LLC for an Increase in Rates

Dear Mr. Foster:

On behalf of B&W Pipeline, please note that the response of Navitas to Request No. 1 of the Staff's October 7, 2015 data request is inaccurate. The 60,411 MCF figure is the total amount of gas that B&W delivered and billed to Navitas in 2014, not the amount "transported" as stated in the data response by Navitas.

Specifically, the gas delivered and billed to Navitas in 2014 breaks down as follows: 49,937 MCF was delivered to Navitas at the Albany meter; 8,001 MCF was delivered at the Byrdstown meter; and 2,411 MCF was delivered to meters used by Navitas customers who are directly connected to the pipeline. Again, the total volume of gas that flows through all of those meters is 60,411 MCF. Navitas is only billed for delivered gas, so there is no issue of shrinkage. And since the meter readings are entirely volumetric, they do not take into account the energy content of the gas, and there is no issue of "hot gas." Finally, Navitas is not billed for any gas that is provided to land owners in exchange for easement rights.

Please contact me if you have any questions about this letter.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

Henry Walker

HW/dbi

cc: Klint Alexander, Esq. Rachel A. Newton, Esq.