

IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE

IN RE: )  
)  
PETITION OF NAVITAS TN NG, LLC )  
FOR APPROVAL OF AN ADJUSTMENT ) Docket No. 19-00057  
IN THE RATES, CHARGES, AND )  
TARIFFS )

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CONSUMER ADVOCATE'S SECOND DISCOVERY  
REQUEST TO NAVITAS TN NG, LLC

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To: Howard La Don Baltimore, Esq.  
Farris Bobango, PLC  
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Nashville, TN 37219  
Email: [dbaltimore@farris-law.com](mailto:dbaltimore@farris-law.com)

This Second Discovery Request is hereby served upon Navitas TN NG, LLC. ("Company" or "Navitas"), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Advocate Unit of the Attorney General's Office ("Consumer Advocate") requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Financial Division, Consumer Advocate Unit, War Memorial Building, 301 6<sup>th</sup> Avenue North, Nashville, Tennessee 37243, c/o Daniel P. Whitaker III, on or before 2:00 p.m. (CDT), December 2, 2019.

**PRELIMINARY MATTERS AND DEFINITIONS**

These Additional Discovery Requests incorporate by reference the same Preliminary Matters and Definitions as set forth in the *Consumer Advocate's First Discovery Request to Navitas* sent to the Company on October 18, 2019, and are to be considered continuing in nature,

and are to be supplemented from time to time as information is received by the Company which would make a prior response inaccurate, incomplete, or incorrect.

### **SECOND DISCOVERY REQUESTS**

2-1. Regarding the response to Request No. 1-53, confirm that all customers with an active meter are assessed a customer charge each month.

#### **RESPONSE:**

2-2. Discuss the process used by Navitas to record uncollectible account expense.

#### **RESPONSE:**

2-3. The Navitas TN 2018 General Ledger reflects a Bad Debt Expense of \$1,410 (account 904). Are uncollectible revenues recorded to any other account in addition to Account 904?

#### **RESPONSE:**

2-4. Provide a copy of a sample bill issued to a Tennessee customer, redacting the customer name, address, and customer account number.

#### **RESPONSE:**

2-5. Does Navitas provide a postcard or paper/envelope bill format to customers? Does Navitas have the capability of including a one-time customer notification on or within their bill?

#### **RESPONSE:**

2-6. Please confirm that the Company has not been applying the fees titled Re-Connection/Temporary Disconnection Fee as is currently outlined in its existing tariff. If this is confirmed, provide an estimate on the number of disconnects which could have qualified for the fee in 2018 and explain how that estimate was derived.

**RESPONSE:**

2-7. Identify the number of customers entering into a Budget Repayment Plan as referenced on Sheet 4 of the Company's tariff in calendar year 2018.

**RESPONSE:**

2-8. Provide a copy of the Budget Repayment Plan.

**RESPONSE:**

2-9. Please confirm the Company is disconnecting customers in Tennessee during cold-weather months consistent with rules and requirements adopted by the Oklahoma Corporation Commission. If this is confirmed, provide a copy of such rules.

**RESPONSE:**

2-10. For 2018 (if information is readily available), provide the monthly CCF split of volumes between those falling into the "First nine CCF per month" category and those falling in the "Greater than nine CCF per month" category for each rate classification.

**RESPONSE:**

2-11. Provide the monthly number of a) disconnects and b) reconnects occurring in 2018 and 2019 to date.

**RESPONSE:**

2-12. For each year ending 12/31/17, 12/31/18, and 10/31/19 (year to date), provide the number and balance of customer accounts receivable by customer class that were 90 days past due.

**RESPONSE:**

2-13. Refer to Item 68 debt & interest 2018.xlsx provided with the company's filing. Confirm that the interest rates shown in this file have not been updated/changed in calendar year 2019. If not confirmed, provide a new version of this file with updated interest rates.

**RESPONSE:**

2-14. Refer to the Company's Response to Request No. 1-30. Provide responses to the following items:

- a. Are these services billed to Navitas Utility Company at cost or at cost-plus?
- b. Provide invoice support for the monthly charge (typically \$1,380 monthly). If invoice support is not available, provide the cost support underlying the monthly charge. This response should include an itemization of the cost elements for this monthly charge and all assumptions and documents supporting each cost.

**RESPONSE:**

2-15. Refer to Navitas Utility Company's General Ledger. Specifically, refer to subaccount 6242 within FERC account 921. Provide answers to the following questions concerning those accounts:

- a. Describe in detail why certain fuel charges are direct assigned to jurisdictions (921.15, 921.16, 921.46, etc) while others are allocated.
- b. Describe in detail why allocated fuel charges for employees whose payroll costs are direct assigned to other jurisdictions are being allocated among jurisdictions, including Tennessee.
- c. Produce a copy of an invoice from one of the monthly charges from "Equity Exchange" for "gas/diesel", and provide the Company's rational for why this charge is allocable to Tennessee customers.

**RESPONSE:**

RESPECTFULLY SUBMITTED,



DANIEL P. WHITAKER III (BPR #035410)

Assistant Attorney General

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**CERTIFICATE OF SERVICE**

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

Howard La Don Baltimore, Esq.  
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414 Union Street, Suite 1105  
Nashville, TN 37219  
Email: dbaltimore@farris-law.com  
Phone: 615-726-1200

This the 22<sup>nd</sup> day of November, 2019.



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DANIEL P. WHITAKER III  
Assistant Attorney General