

19-00084



September 9, 2019

VIA EMAIL AND USPS

David Foster, Division Director
Tennessee Public Utility Commission
502 Deadrick St.
4th Fl.
Nashville, TN 37243

Daniel Whitaker, Esq.
Office of the Tennessee Attorney General
Consumer Advocate Unit
P.O. Box 20207
Nashville, TN 37202

RE: Notice of Probable Shut Down and Discontinuation of Tennessee Service

Dear Sirs:

On behalf of Navitas TN NG, LLC ("Navitas"), we regret to inform you that the Byrdstown-Fentress pipeline will be forced to shut down resulting in the discontinuation of natural gas service to our customers in Tennessee unless an alternate solution to B&W Pipeline, LLC's ("B&W") FERC Order is presented that does not put our company or our other Tennessee customers at risk. Navitas must transport through B&W in order to supply its customers with natural gas in Tennessee and Kentucky and as such is captive to B&W's charges. In order to remain in business, Navitas must pass along B&W's transportation charge to its customers.

The practical effect of B&W implementing its FERC Order is that B&W's charge will raise the cost of gas by approximately \$45 per MCF as 84 customers will be asked to split at minimum \$13,897 per month causing customers to cancel their natural gas service. The total usage for these 84 Tennessee customers on the Byrdstown-Fentress pipeline was 32,925 CCF in 2018. This is an untenable situation for Navitas and its customers. As such, Navitas must immediately advise its customers of this impending spike in cost and suggest the option of finding and securing alternate energy sources to natural gas whether by propane or conversion to all electric.

Navitas recommends that the Tennessee Public Utility Commission or Consumer Advocate initiate an emergency rate case with respect to B&W's transportation charge. As winter is fast approaching, time is of the essence. Navitas intends to send written notice to its customers on or by September 16, 2019 unless otherwise directed by your offices. Please contact Thomas Hartline at (714) 242-4064 or via email at thartline@navitasutility.com to discuss this matter further. Thank you.

Sincerely,

Vanessa Novak, Esq.
Navitas Utility Corporation

Cc: Klint Alexander, Esq. (via email)
Don Baltimore, Esq. (via email)
Henry Walker, Esq. (via email)