

## TENNESSEE PUBLIC UTILITY COMMISSION



502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, Tennessee 37243

September 11, 2019

Henry Walker, Esq.  
Bradley Arant Boult Cummings, LLP  
1600 Division Street, Suite 700  
Nashville, TN 37203  
hwalker@babco.com

***Docket No. 19-00084 – In re: Investigation into Navitas Utility Corporation's Notice of Probable Shut Down and Discontinuation of Tennessee Service***

Dear Mr. Walker:

To assist the Authority in its evaluation of the above-referenced matter, please provide responses to the attached First Staff Data Request to B&W Pipeline, LLC.

It is requested that all responses be provided no later than 2:00 p.m., September, 16, 2019. In accordance with Commission rules submit either (1) an original and thirteen written copies of your response or (2) an original and four written copies and an electronic version. Should you have any questions or need clarification regarding any requested item, please contact me at (615) 770-6891. Thank you for your prompt attention to this matter.

Sincerely,

*Michelle Mairs*

Michelle Mairs, CPA  
Deputy Director, Utilities Division

cc: Vanessa Novak, Esq.  
Navitas Utility Corporation  
3186-D Airway Avenue  
Costa Mesa, CA 92626  
vnovak@navitasutility.com

Daniel Whitaker, Esq.  
Office of the Tennessee Attorney General  
Consumer Advocate Unit  
P.O. Box 20207  
Nashville, TN 37202-0207  
daniel.whitaker@ag.tn.gov

Attachment

**Tennessee Public Utility Commission**  
**Docket No. 19-00084 – *In re: Investigation into Navitas Utility Company's***  
***Notice of Probable Shut Down and Discontinuation of Tennessee Service***  
**First Staff Data Request to B&W Pipeline, LLC**

1. Please explain in detail the impact that the Stipulation and Settlement Agreement between the Federal Energy Regulatory Commission (FERC) and B&W Pipeline, LLC (B&W) in Docket No. PR17-54-000 (Settlement Agreement) has on the rates that B&W charges Navitas TN NG, LLC (Navitas) for transportation of gas supply. Please specifically address the rate impact of the Settlement Agreement for transportation of gas deliveries to Navitas-Tennessee for consumption in Tennessee and gas deliveries to Navitas-Kentucky for consumption in Kentucky.
2. Is the FERC rate for transportation service set forth in the Settlement Agreement applied for transportation of gas deliveries to Navitas-Tennessee for consumption in Tennessee? If yes, please identify the particular law, rule or regulation that authorizes B&W to charge the FERC rate for transportation of gas deliveries to Navitas-Tennessee for consumption in Tennessee.
3. Please state the rate(s) (including but not confined to all fixed/customer charges and all volumetric charges) that B&W charges Navitas for transportation of gas deliveries to Navitas-Tennessee for consumption in Tennessee. Please identify the tariff or agreement containing such rate(s) and state the date such rate(s) became effective for billing purposes.
4. Please state the rate(s) (including but not confined to all fixed/customer charges and all volumetric charges) that B&W charges Navitas for transportation of gas deliveries to Navitas-Kentucky for consumption in Kentucky. Please identify the tariff or agreement containing such rate(s) and state the date such rate(s) became effective for billing purposes.
5. Is it the position of B&W that the minimum monthly fixed/customer charge of \$13,897 and the volumetric charge of \$0.3081 per Mcf established in Commission Docket No. 15-00042 must be applied to gas deliveries to Navitas-Tennessee for consumption in Tennessee? If yes, please explain the rationale supporting your position.
6. Please provide a copy of all invoices for all gas transportation services provided by B&W to Navitas from January 1, 2019 to present.