Electronically Filed in TPUC Docket Room on September 12, 2019 at 11:20 a.m.

Henry Walker Direct: 615.252.2363 Fax: 615.252.6363 hwalker@babc.com



September 12, 2019

VIA ELECTRONIC FILING

Tennessee Public Utility Commission 502 Deaderick Street Nashville, TN 37243

In Re: Docket No. 19-00084

Please accept for filing in the above-captioned docket the attached responses to the Staff's First Data Request.

Sincerely,

Henry Walker BRADLEY ARANT BOULT CUMMINGS LLP

By:

HW/dbi Attachment

BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION

| IN RE: |) | |
|---------------------------------------|---|---------------------|
| Investigation into Navitas Utility |) | |
| Company's Notice of Probable Shut |) | DOCKET NO. 19-00084 |
| Down and Discontinuation of Tennessee |) | |
| Services |) | |

RESPONSE OF B&W PIPELINE, LLC TO FIRST STAFF DATA REQUEST

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.

ANSWER: A copy of the Stipulation and Settlement was filed in Docket 15-00042 on March 21, 2019. A copy of the FERC Order approving the Agreement was filed on May 24, 2019. As explained in the Agreement and the Order, the FERC set an interstate rate of \$2.7172 per Mcf that applies to gas transported via B&W Pipeline in Tennessee and consumed by customers located in Kentucky. The FERC rate does not apply to gas that is consumed by customers located in Tennessee.

For gas that is transported via B&W Pipeline and consumed by customers in Tennessee, B&W Pipeline charges Navitas a fixed monthly rate of \$13,897 as directed by the Commission in Docket 15-00042 (see Order at p. 23, paragraph 9 which states, "A rate design consisting of a fixed monthly charge of \$13,897 from Navitas TN NG LLC) and a volumetric rate of \$0.30813 per Mcf. <u>Id.</u> Those same rates are contained in B&W Pipeline's intrastate tariff that was filed with the Commission on December 15, 2016.

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.

ANSWER: No. The FERC rate applies only to gas that is transported in interstate commerce and consumed by customers located in Kentucky.

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.

ANSWER: For gas consumed in Tennessee, B&W Pipeline charges Navitas the fixed monthly charge of \$13,897 and volumetric charge of \$0.30813 per Mcf as directed by order of this Commission in Docket 15-00042 and set forth in B&W Pipeline's intrastate tariff on file with this Commission.

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.

ANSWER: B&W Pipeline charges Navitas the FERC-approved rate of \$2.7172 per Mcf for gas consumed in Kentucky. That rate is effective, pursuant to the FERC Order, as of July 17, 2017. Prior to that date, B&W Pipeline had attempted to bill Navitas a volumetric rate of \$0.30813 for gas consumed in Kentucky. Navitas declined to pay those charges, pointing out that this Commission wrote in Docket 15-00042, "[T]he Authority's jurisdiction only applies to the gas . . . that is consumed within the borders of Tennessee. Thus the volumetric rate set here shall apply only the gas . . . that is consumed in Tennessee." Order at 22.

5. Is 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.

ANSWER: Yes. Those are the rates set by the Commission in Docket 15-00042 and set forth in B&W Pipeline's intrastate tariff. Under the filed rate doctrine, B&W Pipeline is required to charge those rates and Navitas is required to pay them until the Commission orders otherwise.

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.

ANSWER: See attached Exhibit A.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

Henry Walker (B.P.R. No. 000272)
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Naghville, TN, 37203

Nashville, TN 37203

615-252-2363

hwalker@babc.com

Attorney for B&W Pipeline, LLC

y Wah

CERTIFICATE OF SERVICE

I hereby certify that on the 2 day of September, 2019, a copy of the foregoing document was served on the parties of record, via electronic delivery and U.S. Mail, postage prepaid, addressed as follows:

H. LaDon Baltimore Farris Bobango, PLC Bank of America Plaza 414 Union Street, Suite 1105 Nashville, TN 37219 dbaltimore@farris-law.com

Henry Walker

EXHIBIT A



10025 Investment Dr. Suite 160 Knoxville, TN 37932

| Date. | Invoice# | |
|-----------|----------|--|
| 1/31/2019 | 386 | |

| Bill To | all property and |
|--|------------------|
| Navitas Utility Corporation | 1 |
| 3186 Airway Avenue | |
| Unit D. Costa Mesa | - |
| | |
| CA 92626 | |
| | |
| | |
| | i |
| | 1 |
| No see also particularly and the control of the con | 1 |

| | | P.O. N | o. | Terms | Project |
|---------------------|---|---|---------|--------------|----------|
| 1,847 | Natural Gas Transp For Natural Gas De and Directly Connec Gas Transported Do | ortation Service Volumetric Charges livered To Byrdstown, TN City Gate cted Customers uring January 2019 | MCF | 0.3081 | 569.06 |
| | Invoice This Invoice Is Due Above | n Rendered At The Date of The in Full 30 Days From The Date Shown I After This Date Will Incur a 5% per nt Penalty | | | |
| | | | | | |
| | | | | | |
| Please make your ch | eck payable to B&W | PIPELINE, LLC | | Total | \$569.06 |
| Phone # | 1-865-240-0167 | E-mail | talktou | s@enrema.com | |



| Date | Invoice# | |
|-----------|----------|--|
| 2/28/2019 | 390 | |

| : | | |
|---|------|--|
| | بريد | |

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| | | F.O. N | lo. | Terms | Project |
|--|--|---|--|--|--|
| | | | | The state of the s | |
| | of Virtual of process specime, since a sea county account a strengt of companying a grid | yanganna a - iya angara ay gana ay mananan hannana, yana anna mandan a a muu maan a a muu a biram | | | Andrew Market Ma |
| 2,087 | Natural Gas Transported Duck For Natural Gas Del and Directly Connec Gas Transported Du | ortation Service Volumetric Charges ivered To Byrdstown, TN City Gate sted Customers uring February 2019 | MCF | 0.3081 | 643.0 |
| ge. | Invoice | n Rendered At The Date of The in Full 30 Days From The Date Shown | Control of Primary Control of Pr | | |
| | Above | After This Date Will Incur a 5% per | many can be written as to consider the constant of | | |
| | | | manus radios i vais, dade | | |
| | | | | | |
| | | | access of the contract of the | mind of the state | |
| | | | | | A communication of the department of the departm |
| | | | · | | Teaming and all the al |
| and the second s | ! | | | | |
| ase make your ch | ieck payable to B&W | PIPELINE, LLC | | Total | \$643. |
| Phone # | 1-865-240-0167 | en e | talkto | ais@enrema.com | dament of the state of the stat |



| Date | Invoice # |
|-----------|-----------|
| 5/31/2019 | 400 |

| Bill To Navitas Utility Corporation | |
|--------------------------------------|--|
| 3186 Airway Avenue | |
| Unit D. Costa Mesa | |
| CA 92626 | |
| | |
| | |
| | |

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|--------------------|---|---|----------|--------------|-------------|
| | 1 Customer Base Use | Charge (Navitas Utilities) | | 13,897.67 | 13,897.67 |
| | Gas Transported Du | ring May 2019 | | | |
| | Invoice This Invoice Is Due i Above Payments Received | Rendered At The Date of The n Full 30 Days From The Date Shown After This Date Will Incur the Interest he FERC per Month Late Payment | | | |
| | Penalty | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| Please make your c | heck payable to B&W | PIPELINE, LLC | | Total | \$13,897.67 |
| | 1 005 040 0107 | Email | tallston | s@enrema.com | |



Sunbright, TN 37872

| Date | Invoice # |
|-----------|-----------|
| 7/31/2019 | 413 |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|----------------------|--|---|----------|-------------|-------------|
| 6,999 | Natural Gas Transp For Natural Gas De (Navitas KY NG, LL Gas Transported Do | ortation Service Volumetric Charges livered To Albany, KY City Gate C) uring July 2019 | MCF | 2.7172 | 19,017.68 |
| | | | | | |
| | Services Have Beer Invoice | n Rendered At The Date of The | | | |
| | This Invoice Is Due Above | in Full 30 Days From The Date Shown | | | |
| | Payments Received rate determined by Penalty | After This Date Will Incur the interest the FERC per Month Late Payment | | | |
| | | | | | |
| Please make your che | eck payable to B&W | PIPELINE, LLC | | Total | \$19,017.68 |
| | | | | | Ι |
| Phone # | 1-865-240-0167 | E-mail | talktous | @enrema.com | |



9534 Morgan County Hwy Sunbright, TN 37872

| Date | Invoice # |
|-----------|-----------|
| 8/31/2019 | 416 |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|--------------------|---------------------------|---|---------|--------------|---------|
| 211 | For Natural Gas De | ortation Service Volumetric Charges livered To Byrdstown, TN City Gate cted Customers (Navitas TN NG, LLC) uring August 2019 | MCF | 0.3081 | 65.01 |
| | | | 227 | | |
| | Invoice | n Rendered At The Date of The in Full 30 Days From The Date Shown | | | |
| | Above | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| lease make your ch | l eck payable to B&W l | PIPELINE, LLC | I i | Total | \$65.01 |
| Phone # | 1-865-240-0167 | E-mail | talktou | s@enrema.com | |



| Date | Invoice # |
|-----------|-----------|
| 7/31/2019 | 411 |

| Bill To | |
|---|--|
| Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626 | |
| | |

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Natural Gas Transportation Service For Natural Gas Delivered To Byrd and Directly Connected Customers Gas Transported During July 2019 Services Have Been Rendered At Invoice This Invoice Is Due in Full 30 Days Above | town, TN City Gate (Navitas TN NG, LLC) The Date of The | 0.3081 | 92.74 |
|--|--|--------|---------|
| Invoice This Invoice Is Due in Full 30 Days | | | |
| Invoice This Invoice Is Due in Full 30 Days | | | |
| This Invoice Is Due in Full 30 Days | From The Date Shown | | |
| | | | |
| | | | |
| | 1 | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Please make your check payable to B&W PIPELINE, LLC | | Total | \$92.74 |



| Date | Invoice# |
|-----------|----------|
| 8/31/2019 | 415 |

Project

Terms

Net 30

talktous@enrema.com

Bill To Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa

CA 92626

| Quantity | Description | U/M | Rate | Amount |
|-----------------|--|-----|-----------|-----------|
| | Customer Base Use Charge (Navitas TN NG, LLC) | | 13,897.67 | 13,897.67 |
| | Gas Transported During August 2019 | | | |
| | Services Have Been Rendered At The Date of The Invoice This Invoice Is Due in Full 30 Days From The Date Shown Above | | | |
| | Payments Received After This Date Will Incur a 5% per Month Late Payment Penalty | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| ano maka yaur s | heck payable to B&W PIPELINE, LLC | | | |
| ase make your o | nicon payable to barr in Eline, LLo | | Total | \$13,897. |

E-mail

1-865-240-0167

Phone #

P.O. No.



| Date | Invoice # |
|-----------|-----------|
| 5/31/2019 | 401 |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | Description | U/M | Rate | Amount |
|---------------------|---|-----|--------|-------------|
| 8,449 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate Gas Transported During May 2019 | MCF | 2.7172 | 22,957.62 |
| | Services Have Been Rendered At The Date of The Invoice This Invoice Is Due in Full 30 Days From The Date Shown Above Payments Received After This Date Will Incur the interest rate determined by the FERC per Month Late Payment Penalty | | | |
| Please make your ch | eck payable to B&W PIPELINE, LLC | | Total | \$22,957.62 |

| Phone # | 1-865-240-0167 | E-mail | talktous@enrema.com |
|---------|----------------|--------|---------------------|
|---------|----------------|--------|---------------------|



10025 Investment Dr. Suite 160 Knoxville, TN 37932

| Daite | | Involes# | |
|-----------|-------------|----------|--|
| 1/31/2019 | The same of | 385 | |

| Eill To Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa | (saladadadadada) |
|--|------------------|
| CA 92626 | |
| | |
| | |
| | |
| | |

| | P.O. N | ó). | Terms | Project |
|---------------------|---|--|--|--|
| | | | | |
| | | | 13,897.67 | 13,897.67 |
| 1 | Customer Base Use Charge (Navitas Utilíties) | | | ŕ |
| | Gas Transported During January 2019 | | | |
| | Services Have Been Rendered At The Date of The | The state of the s | | |
| | Invoice This Invoice Is Due in Full 30 Days From The Date Shown Above | Automotive de Au | | |
| | Payments Received After This Date Will Incur a 5% per Month Late Payment Penalty | e constante en accessor en acc | | |
| | | | | |
| ¥ | | to the state of th | | |
| | | | | |
| | | | | |
| | | The second of th | | |
| | | Chromodological Control | | |
| | | | | |
| | | | COCCOMMUNICATION CONTRACTOR CONTR | |
| Please make your ch | eck payable to B&W PIPELINE, LLC | Land 164, 200, 200, 100, 100, 100, 100, 100, 100 | Total | \$13,897.67 |
| | | the second secon | and the same of th | ang and a second |



| Date | Invoice # |
|-----------|-----------|
| 6/30/2019 | 407 |

| Bill To |
|---|
| Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626 |
| |

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|----------------|----------------------------|--|---------|--------------|-------------|
| | 1 Customer Base Use | Charge (Navitas TN) | | 13,897.67 | 13,897.67 |
| | Gas Transported Du | ring June 2019 | | | |
| | Invoice | Rendered At The Date of The n Full 30 Days From The Date Shown | | | |
| | Above Payments Received | After This Date Will Incur the Interest he FERC per Month Late Payment | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| ease make your | check payable to B&W | PIPELINE, LLC | | Total | \$13,897.67 |
| Phone # | 1-865-240-0167 | E-mail | talktou | s@enrema.com | |



| Date | Invoice# |
|-----------|----------|
| 8/31/2019 | 418 |

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

1-865-240-0167

Phone #

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

talktous@enrema.com

| Quantity | Description | U/M | Rate | Amount |
|--------------------|---|-----|----------|------------|
| | Interest accrued during August 2019 on unpaid invoices as per the FERC published interest rate for Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate (Navitas KY NG, LLC) | | 2,883.25 | 2,883.25 |
| | This Invoice is Due in Full 30 Days From the Date Shown Above Payments Received After This Date Will Incur the Interest Rate determined by the FERC per Month Late Payment Penalty | | | |
| Please make your o | check payable to B&W PIPELINE, LLC | | Total | \$2,883.25 |

E-mail



| Invoice # |
|--|
| 414 |
| and the second s |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

1-865-240-0167

Phone #

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

talktous@enrema.com

| Quantity | Description | U/M | Rate | Amount |
|--------------------|---|-----|----------|------------|
| | Interest accrued during July 2019 on unpaid invoices as per the FERC published interest rate for Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate (Navitas KY NG, LLC) | | 2,793.61 | 2,793.61 |
| | This Invoice is Due in Full 30 Days From the Date Shown Above Payments Received After This Date Will Incur the Interest Rate determined by the FERC per Month Late Payment Penalty | | | |
| Please make your c | check payable to B&W PIPELINE, LLC | | Total | \$2,793.61 |

E-mail



| Date | Invoice # |
|-----------|-----------|
| 6/30/2019 | 408 |

| Bill To |
|----------------------------|
| avitas Utility Corporation |
| 186 Airway Avenue |
| nit D. Costa Mesa |
| A 92626 |
| |
| |
| |

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|---------------------|---|--|---------|--------------|----------|
| 424 | Natural Gas Transp For Natural Gas De and Directly Conne Gas Transported D | ortation Service Volumetric Charges livered To Byrdstown, TN City Gate cted Customers uring June 2019 | MCF | 0.3081 | 130.63 |
| | Invoice This Invoice Is Due Above Payments Received | in Rendered At The Date of The in Full 30 Days From The Date Shown d After This Date Will Incur the interest the FERC per Month Late Payment | | | |
| | | | | | |
| | | | | | |
| Please make your ch | eck payable to B&W | PIPELINE, LLC | | | |
| | | | | Total | \$130.63 |
| Phone # | 1-865-240-0167 | E-mail | talktou | s@enrema.com | |



| Date | Invoice# |
|-----------|----------|
| 5/31/2019 | 399 |

| Ы | Ш | 10 |
|---|------|-------|
| | 5500 | 28160 |
| | | |

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | Description | U/M | Rate | Amount |
|-------------------|---|-----|--------|--------|
| 286 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers | MCF | 0.3081 | 88.12 |
| | Gas Transported During May 2019 | | | |
| | Services Have Been Rendered At The Date of The Invoice | | | |
| | This Invoice Is Due in Full 30 Days From The Date Shown Above | | | |
| | Payments Received After This Date Will Incur the interest rate determined by the FERC per Month Late Payment Penalty | | | |
| | Certally | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | alica scalla ta DOM DIDELINE LLC | | | |
| ase make your che | eck payable to B&W PIPELINE, LLC | | Total | \$88.1 |



| Date | Invoice # |
|-----------|-----------|
| 4/30/2019 | 398 |

| Bill To | |
|---|--|
| Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626 | |
| | |

1-865-240-0167

Phone #

| P.O. No. | Terms | Project |
|----------|-------|---------|
| | | |

talktous@enrema.com

| Quantity | Description | U/M | Rate | Amount |
|-----------------|---|-----------------------|--------|---------|
| 903 | Natural Gas Transportation Service Volumetric C For Natural Gas Delivered To Byrdstown, TN Cit and Directly Connected Customers Gas Transported During April 2019 | Charges MCF y Gate | 0.3081 | 278.21 |
| | Services Have Been Rendered At The Date of T Invoice This Invoice Is Due in Full 30 Days From The Da Above Payments Received After This Date Will Incur a Month Late Payment Penalty | ite Shown | | |
| | | | | |
| | | | | |
| se make your ch | eck payable to B&W PIPELINE, LLC | | Total | \$278.2 |

E-mail



9534 Morgan County Hwy Sunbright, TN 37872

| Date | Invoice # |
|-----------|-----------|
| 4/30/2019 | 402 |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | Description | U/M | Rate | Amount |
|---------------------|--|-----|--------|-----------|
| 1,598 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - July 17-31 2017 | MCF | 2.7172 | 4,342.09 |
| 5,193 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - August 2017 | MCF | 2.7172 | 14,110.42 |
| 6,413 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - September 2017 | MCF | 2.7172 | 17,425.40 |
| 7,716 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - October 2017 | MCF | 2.7172 | 20,965.92 |
| 11,584 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - November 2017 | MCF | 2.7172 | 31,476.04 |
| 12,773 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - December 2017 | MCF | 2.7172 | 34,706.80 |
| 13,361 | Principal segretary and principal segretary and principal segretary and any angular and a segretary and a segr | MCF | 2.7172 | 36,304.51 |
| 11,303 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - February 2018 | MCF | 2.7172 | 30,712.51 |
| 10,625 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - March 2018 | MCF | 2.7172 | 28,870.25 |
| 11,254 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - April 2018 | MCF | 2,7172 | 30,579.37 |
| 7,302 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - May 2018 | MCF | 2.7172 | 19,840.99 |
| lease make your che | eck payable to B&W PIPELINE, LLC | | Total | |



| Date | Invoice # |
|-----------|-----------|
| 4/30/2019 | 402 |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | Description | U/M | Rate | Amount |
|-----------------|--|-----|--------|-----------|
| 6,490 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - June 2018 | MCF | 2.7172 | 17,634.63 |
| 6,692 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - July 2018 | MCF | 2.7172 | 18,183.50 |
| 6,092 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - August 2018 | MCF | 2.7172 | 16,553.18 |
| 6,480 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - September 2018 | MCF | 2.7172 | 17,607.46 |
| 9,305 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - October 2018 | MCF | 2.7172 | 25,283.55 |
| 12,804 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - November 2018 | MCF | 2.7172 | 34,791.03 |
| 14,160 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - December 2018 | MCF | 2.7172 | 38,475.55 |
| 13,164 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - January 2019 | MCF | 2.7172 | 35,769.22 |
| 13,212 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - February 2019 | MCF | 2.7172 | 35,899.65 |
| 13,057 | | MCF | 2,7172 | 35,478.48 |
| 9,722 | Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - April 2019 | MCF | 2.7172 | 26,416.62 |
| e make your che | eck payable to B&W PIPELINE, LLC | | | |



| Date | Invoice # |
|-----------|-----------|
| 4/30/2019 | 402 |

| Bill To |
|---|
| Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626 |
| |

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| This Invoice is Due in Full 30 Days From the Date Shown Above Payments Received After This Date Will Incur the Interest Rate determined by the FERC per Month Late Payment Penalty | Quantity | Description | U/M | Rate | Amount |
|--|-------------------|--|-----|-----------|--------------|
| Above Payments Received After This Date Will Incur the Interest Rate determined by the FERC per Month Late Payment Penalty Description of the FERC penalty Description of the F | | Interest accrued on unpaid invoices as per the FERC published interest rates | | 22,248.30 | 22,248.30 |
| ease make your check payable to B&W PIPELINE, LLC Total \$593,675. | | Above Payments Received After This Date Will Incur the Interest Rate determined by the FERC per Month Late Payment | | | |
| ease make your check payable to B&W PIPELINE, LLC Total \$593,675. | | | | | |
| ease make your check payable to B&W PIPELINE, LLC Total \$593,675. | | | | | |
| ease make your check payable to B&W PIPELINE, LLC Total \$593,675. | | | | | |
| Total \$593,675. | 1 | The state of the DOWN DIDELINE LLC | | | |
| | ease make your cr | leck payable to bow FIFELINE, LLO | | Total | \$593,675.47 |



| Date | Invoice # |
|-----------|-----------|
| 7/31/2019 | 412 |

| Bill To |
|---|
| Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626 |
| |

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|------------------|----------------------|--|---------|--------------|-------------|
| | 1 Customer Base Use | e Charge (Navitas TN NG, LLC) | | 13,897.67 | 13,897.67 |
| | Gas Transported D | uring July 2019 | | | |
| | Invoice | n Rendered At The Date of The in Full 30 Days From The Date Shown | | | |
| | | d After This Date Will Incur a 5% per nt Penalty | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| Please make your | check payable to B&W | PIPELINE, LLC | | Total | \$13,897.67 |
| Phone # | 1-865-240-0167 | E-mail | talktou | s@enrema.com | |



| Date | #emioval |
|-----------|----------|
| 2/28/2019 | 389 |

| Bill To | |
|-----------------------------|-----|
| Navitas Utility Corporation | |
| 3186 Airway Avenue | |
| Unit D. Costa Mesa | - 1 |
| CA 92626 | 1 |
| | |
| | |
| | - |

| | | P.O. No. | Terms | Project |
|------------------|---|-----------------------|-----------|------------|
| | Customer Base Use Charge (Navi | tas Utilities) | 13.897.67 | 13,897.67 |
| | · Gas Transported During February | 2019 | | |
| | Services Have Been Rendered Al Invoice This Invoice Is Due in Full 30 Days Above Payments Received After This Day Month Late Payment Penalty | s From The Date Shown | | |
| | | | | |
| | | | | |
| | | | | |
| ease make your c | L heck payable to B&W PIPELINE, LL0 | C | Total | \$13,897.6 |

Phone #

1-865-240-0167

E-mail

talktous@enrema.com



| Date | Invoice # |
|-----------|-----------|
| 6/30/2019 | 406 |

| Bill To | |
|---|--|
| Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626 | |
| O/(02020 | |

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|---------------------|--|--|---------|--------------|-------------|
| 7,019 | Natural Gas Transp For Natural Gas De Gas Transported Di | ortation Service Volumetric Charges livered To Albany, KY City Gate uring June 2019 | MCF | 2.7172 | 19,072.03 |
| | Invoice This Invoice Is Due Above Payments Received | in Rendered At The Date of The in Full 30 Days From The Date Shown d After This Date Will Incur the interest the FERC per Month Late Payment | | | |
| Please make your ch | eck payable to B&W | PIPELINE, LLC | | Total | \$19,072.03 |
| Di # | 1 8/5 240 01/7 | E-mail | talktou | s@enrema.com | |



| Date | Invoice # | |
|-----------|-----------|--|
| 3/31/2019 | 394 | |

| Bill To |
|---|
| avitas Utility Corporation 186 Airway Avenue nit D. Costa Mesa A 92626 |
| |

| P.O. No. | Terms | Project |
|----------|-------|---------|
| | | |

| Quantity | Description | / | U/M Ra | ite | Amount |
|----------------------|--|--|--------|--------|----------|
| 2,093 | Natural Gas Transportation Service Volumetric For Natural Gas Delivered To Byrdstown, TN C and Directly Connected Customers Gas Transported During March 2019 | Charges MCF City Gate | | 0.3081 | 644.85 |
| | | | | | |
| | Services Have Been Rendered At The Date o Invoice This Invoice Is Due in Full 30 Days From The I Above | Date Shown | | | |
| | Payments Received After This Date Will Incur Month Late Payment Penalty | a 5% per | | ' . | |
| | | | | | |
| | | Allowand Control of the Control of t | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| Please make your che | eck payable to B&W PIPELINE, LLC | | Total | | \$644.85 |



| Date | Invoice # |
|-----------|-----------|
| 6/30/2019 | 405 |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|-----------------|---|--|---------|---------------|------------|
| | per the FERC public Natural Gas Transp | ring June 2019 on unpaid invoices as shed interest rate for ortation Service Volumetric Charges livered To Albany, KY City Gate | | 2,571.42 | 2,571.42 |
| | Above Payments Received | in Full 30 Days From the Date Shown After This Date Will Incur the Interest the FERC per Month Late Payment | | | |
| lease make your | check payable to B&W | PIPELINE, LLC | | Total | \$2,571.42 |
| Phone # | 1-865-240-0167 | E-mail | talktou | ls@enrema.com | |



| Date | Invoice# |
|-----------|----------|
| 3/31/2019 | 393 |

| Bill To | |
|-----------------------------|---|
| Navitas Utility Corporation | 7 |
| 3186 Airway Avenue | |
| Unit D. Costa Mesa | |
| CA 92626 | |
| | |
| | |
| | |
| | |

| P.O. No. | Te | erms | Project |
|----------|----|------|---------|
| | | | |

| Quantity | Description | U/M | Rate | Amount |
|---|---|---|-----------|-------------|
| *************************************** | Customer Base Use Charge (Navitas Utilities) | aganya nginin menanda akili danjigan di rhumba jiyaga ilipan, nyangga nayyana nyaka | 13,897.67 | 13,897.67 |
| | Gas Transported During March 2019 | | | |
| | Services Have Been Rendered At The Date of The Invoice This Invoice Is Due in Full 30 Days From The Date Shown Above Payments Received After This Date Will Incur a 5% per Month Late Payment Penalty | | | |
| | | | | |
| Please make your ch | neck payable to B&W PIPELINE, LLC | | Total | \$13,897.67 |
| | | | | |



| Date | Invoice # |
|-----------|-----------|
| 8/31/2019 | 417 |

Bill To

Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

| P.O. No. | Terms | Project |
|----------|--------|---------|
| | Net 30 | |

| Quantity | | Description | U/M | Rate | Amount |
|-------------------|--|--|---------------------|--------|-------------|
| 6,730 | For Natural Gas De (Navitas KY NG, LL | ortation Service Volumetric Charges livered To Albany, KY City Gate C) | MCF | 2.7172 | 18,286.76 |
| | Gas Transported D | uring August 2019 | | | |
| | | | | | |
| | Invoice This Invoice Is Due | n Rendered At The Date of The in Full 30 Days From The Date Shown | | | |
| | rate determined by | After This Date Will Incur the interest the FERC per Month Late Payment | | | |
| | Penalty | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | DIDELINIS III O | | | |
| ase make your che | eck payable to B&W | PIPELINE, LLC | | Total | \$18,286.76 |
| Phone # | 1-865-240-0167 | E-mail | talktous@enrema.com | | |



| Date | Invoice# |
|-----------|----------|
| 4/30/2019 | 397 |

| BIII To | |
|---|--|
| Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626 | |
| | |

| P.O. No. | Terms | Project |
|----------|-------|---------|
| | | |

| Quantity | Description | U/M | Rate | Amount |
|-----------------|---|---|-----------|------------|
| 1 | Customer Base Use Charge (Navitas Utilities) | | 13,897.67 | 13,897.67 |
| | Gas Transported During April 2019 | | | |
| | Services Have Been Rendered At The Date of The Invoice | | | |
| | This Invoice Is Due in Full 30 Days From The Date Shown Above Payments Received After This Date Will Incur a 5% per Month Late Payment Penalty | · | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| se make your ch | eck payable to B&W PIPELINE, LLC | Server regers and the server regers are the server regers and the server regers and the server regers are the server regers and the server regers and the server regers are the | Total | \$13,897.6 |