



September 13, 2019

ATTN: Michelle Mairs, Deputy Director  
Tennessee Public Utilities Commission  
Andrew Jackson State Office Bld.  
502 Deaderick St., 4th Fl.  
Nashville, TN 37243

**RE: Navitas TN NG, LLC Responses to Commission Staff's First Data Request  
Docket No.: 19-00084**

Dear Ms. Mairs:

Pursuant to your request, please find enclosed Responses to Commission Staff's First Data Request to Navitas TN NG, LLC for filing in Docket No. 19-00084. Enclosed herein is the original, four written copies, and an electronic copy. Should you have any questions or require anything further, please do not hesitate to contact me at (714) 242-4064 or via email at [vnovak@navitasutility.com](mailto:vnovak@navitasutility.com). Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Vanessa Novak". The signature is fluid and cursive.

Vanessa Novak, Esq.  
Navitas Utility Corporation

Enclosures and flash drive (1)

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION  
NASHVILLE, TENNESSEE**

**IN RE:**

<b>INVESTIGATION INTO NAVITAS</b>	)	
<b>UTILITY COMPANY'S NOTICE OF</b>	)	
<b>PROBABLE SHUT DOWN AND</b>	)	<b>DOCKET NO. 19-00084</b>
<b>DISCONTINUATION OF TENNESSEE</b>	)	
<b>SERVICES</b>	)	

**RESPONSES TO COMMISSION STAFF'S FIRST DATA REQUEST  
TO NAVITAS TN NG, 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. PR1 7-54-000 (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.

**RESPONSE:**

The Stipulation and Settlement Agreement between FERC and B&W in Docket No. PR1 7-54-000 (Settlement Agreement) dramatically increases the cost of the transportation of natural gas to Tennessee consumers served by Navitas TNNG, LLC and B&W Pipeline, LLC.

Enclosed please find three pages of global impact calculations and two pages of customer specific impact calculations.

Highlights of the impact (based on the twelve-month period from July 1, 2018 to June 30, 2019):

- Total B&W Pipeline charges increase from \$212,548 to \$340,493.
- Monthly GCA in Tennessee increases from the current range of \$5.70 to \$9.83 with an average of \$7.66 per MCF to a range \$13.26 to \$126.34 with an average of \$22.18 per MCF.
- Monthly GCA in Kentucky decreases from an average of \$7.66 to \$7.37 per MCF.
- The largest Tennessee customer's total annual bill goes from \$28,644 to \$57,885 an increase of more than 100%.
- The smallest Tennessee customer's total annual bill goes from \$459 to \$825.
- The average Tennessee residential customer's bill goes from an average of \$20.10 to \$36.88 per MCF.

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.

**RESPONSE:**

The FERC rate for transportation service set forth in the Settlement Agreement should not to be applied to transportation of gas deliveries to Navitas-Tennessee for consumption in Tennessee. Rather, the FERC order was to extend only to the transportation of gas in interstate commerce. Furthermore, because the FERC rate did not appear to contemplate the sharing of the customer charge imposed in the Tennessee rate for the B&W Pipeline, it effectively precludes that same action.

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.

**RESPONSE:**

- Rates
  - Monthly charge: \$13,897.67 per month.
  - Flow charge for TN customers: \$0.30813.
  - Flow charge for gas transported to KY customers: \$0.30813 per MCF. This charge was subject to a requirement by the TRA for B&W to obtain FERC approval prior to its implementation:

“[t]he Authority’s jurisdiction applies only to the gas that is delivered to Navitas that is consumed within the borders of Tennessee. Thus, the volumetric rates set here shall apply only to the gas transported by B&W that is consumed in Tennessee. It is the intent of the Authority, with respect to this decision setting rates, that FERC review, consider and grant B&W’s timely application for an Order No. 63 certificate, authorizing the use of the rate set in this Order for all gas transported on B&W’s pipeline, whether ultimately consumed in Tennessee or Kentucky.”
- TPUC Order 15-00042
- TPUC Order date March 10, 2016

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.

**RESPONSE:**

- Rates
  - Flow charge for gas transported by Navitas through B&W Pipeline to KY customers: \$2.7172 per MCF.

In its order, FERC clarified the following:

“Navitas is only subject to B&W’s SOC to the extent that it wishes to ship natural gas in interstate commerce via B&W’s facilities.”

Thus, when Navitas ships its gas from the Spectra East Tennessee Pipeline it is subject to the FERC rate. However, when B&W’s affiliated exploration and production operations ship gas through the B&W pipeline and Navitas takes custody of that gas at its Navitas KY NG, LLC city gate, it is not subject to the FERC tariff as Navitas is not the owner or shipper of the gas.

- FERC Order PR17-54-002
- FERC Order date September 4, 2019

5. Is it the position of Navitas 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.

**RESPONSE:**

No. It is not the position of Navitas that the tariffs established in Order 15-00042 must be applied to gas deliveries to Navitas-Tennessee for consumption in Tennessee. Navitas believes the intent and structure of Order 15-00042 warrants discussion, clarification, and possibly revising.

First, as demonstrated in Response to Question 1 above, it is not economically feasible for the Navitas TN NG, LLC customers in the Byrdstown-Fentress Area supplied by the B&W Pipeline to bear the entirety of the \$13,897 per month customer charge; not now, nor in 2016 when the rates were allegedly implemented.

Second, in more than two dozen other city-gate locations in over four states, Navitas does not have a customer charge remotely approaching \$13,897 per month. In

fact, the B&W customer charge is on an order of magnitude greater than any other transport customer charge experienced by Navitas.

Third, the intervening regulatory actions of both Tennessee and Kentucky authorities reviewed and approved on a regular basis the sharing of said customer charge. Navitas believes these facts demonstrate that the monthly charge was intended to be shared on a pro rata basis; moreover, the tariff was specifically structured to benefit B&W Pipeline as it sought the Order No. 63 certificate. It is possible that, due to the jurisdictional issues as discussed in the Order and noted above, staff did not opine on the clearly necessary pro rata sharing.

Navitas believes that, given the dire circumstances of the mutual customers of Navitas and B&W, staff could issue a clarification of the Order.

It is not clear why FERC decided to lower rates for Navitas and B&W customers in Kentucky and, at the same time, make the rates for Navitas and B&W customers in Tennessee untenable; this demonstrates why local jurisdiction closer to those effected is best. However, the choice by FERC to not reaffirm Order 15-00042 clearly necessitates and warrants revisiting it to realign all the tariffs, taking into account FERC designed revenue for B&W in Kentucky and ensuring that the revised Order 15-00042 tariffs generate the revenue requirement established in the Order such that B&W can continue with their safe and improved service to the Navitas and B&W customers.

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.

See attached **Exhibit 1**.

Respectfully Submitted by:

A handwritten signature in blue ink, appearing to read 'THOMAS HARTLINE', is written over a rectangular stamp area.

Thomas Hartline  
Navitas TN NG, LLC

Volume	Sales CCF		Sales in MCF			Commodity in MCF			
	TN	KY	TN	KY	Total	Petrol	B&W affil	Total	
Month									
JUL	1,274	56,722	127	5,672	5,800	2,667	4,822	7,489	
AUG	1,223	68,546	122	6,855	6,977	1,258	6,222	7,480	
SEP	1,330	60,828	133	6,083	6,216	1,591	5,543	7,134	
OCT	4,142	73,010	414	7,301	7,715	5,119	5,847	10,966	
NOV	11,536	133,756	1,154	13,376	14,529	10,934	5,417	16,351	
DEC	20,572	139,098	2,057	13,910	15,967	12,501	6,024	18,525	
JAN	24,596	122,280	2,460	12,228	14,688	12,699	5,599	18,298	
FEB	18,414	146,596	1,841	14,660	16,501	10,916	6,065	16,981	
MAR	17,463	127,831	1,746	12,783	14,529	10,720	6,075	16,795	
APR	8,101	93,024	810	9,302	10,113	5,356	6,117	11,473	
MAY	1,115	94,878	112	9,488	9,599	3,382	5,889	9,271	
JUN	1,700	65,006	170	6,501	6,671	2,219	5,594	7,813	
			11,147	118,158	129,304			148,576	115%
			8.6%	91.4%					

Line loss is 6.34% in KY (7100 report) with the balance in TN (predominately the allowed free consumer transport).

Note: B&W affiliate is the sister company to the pipeline, it has billed under several names including FWM and Sparta.

Dollars	Commodity			Transportation				Total	\$ /unit
	Petrol	B&W affil	Sub total	Spectra	B&W (TN as ordered by PUC)		Sub total		
Month					Monthly	Flow	Sub total		
					13,897.67	0.3081			
JUL	12,988	19,192	32,180	1,681	13,898	2,307	16,205	50,066	\$ 8.63
AUG	5,915	23,706	29,621	1,673	13,898	2,305	16,202	47,496	\$ 6.81
SEP	7,470	21,839	29,309	1,672	13,898	2,198	16,096	47,077	\$ 7.57
OCT	25,191	23,271	48,462	1,676	13,898	3,379	17,276	67,414	\$ 8.74
NOV	67,080	23,781	90,861	1,685	13,898	5,038	18,935	111,481	\$ 7.67
DEC	103,946	31,807	135,753	1,670	13,898	5,708	19,605	157,028	\$ 9.83
JAN	79,877	31,970	111,847	1,680	13,898	5,638	19,535	133,062	\$ 9.06
FEB	63,313	25,412	88,725	1,660	13,898	5,232	19,130	109,515	\$ 6.64
MAR	52,742	22,052	74,795	1,669	13,898	5,175	19,072	95,536	\$ 6.58
APR	25,548	24,468	50,016	1,665	13,898	3,535	17,433	69,113	\$ 6.83
MAY	15,101	21,200	36,301	1,669	13,898	2,856	16,754	54,724	\$ 5.70
JUN	9,726	19,691	29,417	1,661	13,898	2,407	16,305	47,383	\$ 7.10
			757,286				212,548	989,894	\$ 7.66
							232,609		

**Volume in MCF**

Month	Sales		Commodity		Transportation		
	TN	KY	Petrol	Sparta	TN	KY	
					Note 3	B&W affil Note 1	Navitas Note 2
JUL	127	5,672	2,667	4,822	1,457	4,716	1,316
AUG	122	6,855	1,258	6,222	191	6,113	1,176
SEP	133	6,083	1,591	5,543	666	5,424	1,044
OCT	414	7,301	5,119	5,847	3,202	5,533	2,231
NOV	1,154	13,376	10,934	5,417	2,127	4,987	9,237
DEC	2,057	13,910	12,501	6,024	3,733	5,248	9,544
JAN	2,460	12,228	12,699	5,599	5,295	4,661	8,342
FEB	1,841	14,660	10,916	6,065	1,392	5,388	10,201
MAR	1,746	12,783	10,720	6,075	3,201	5,345	8,249
APR	810	9,302	5,356	6,117	1,581	5,627	4,265
MAY	112	9,488	3,382	5,889	(818)	5,821	4,269
JUN	170	6,501	2,219	5,594	900	5,451	1,461

**Dollars**

Month	Commodity			Transportation					Total
	Petrol	B&W affil	Sub total	Spectra	B&W (TN & FERC Order)			Sub total	
					Monthly TN	Flow TN	Flow KY	Sub total	
JUL	12,988	19,192	32,180	1,681	13,898	449	3,575	17,922	51,782
AUG	5,915	23,706	29,621	1,673	13,898	59	3,196	17,153	48,446
SEP	7,470	21,839	29,309	1,672	13,898	205	2,837	16,940	47,921
OCT	25,191	23,271	48,462	1,676	13,898	987	6,061	20,946	71,084
NOV	67,080	23,781	90,861	1,685	13,898	655	25,098	39,651	132,197
DEC	103,946	31,807	135,753	1,670	13,898	1,150	25,932	40,980	178,403
JAN	79,877	31,970	111,847	1,680	13,898	1,631	22,667	38,196	151,722
FEB	63,313	25,412	88,725	1,660	13,898	429	27,718	42,044	132,429
MAR	52,742	22,052	74,795	1,669	13,898	986	22,413	37,297	113,761
APR	25,548	24,468	50,016	1,665	13,898	487	11,589	25,974	77,655
MAY	15,101	21,200	36,301	1,669	13,898	(252)	11,599	25,245	63,215
JUN	9,726	19,691	29,417	1,661	13,898	277	3,971	18,146	49,224
			757,286					340,493	1,117,839

Note 1 Pro rata portion of B&W affiliate gas, custody of this gas does not transfer to Navitas until it is passed to the Navitas KYNG pipeline.

Note 2 Per the issued FERC clarification the tariff only applies to gas owned by Navitas and transported through B&W.

Note 3 Balance of commodity purchases after 106.34% of sales delivered to KY. Negative number is a timing difference in measurements.



TN effect	Commodity	Transport				Total	
		Spectra	Monthly TN	Flow TN	Sub total		
Month							
JUL	707	37	13,898	449	14,384	15,090	118.45
AUG	519	29	13,898	59	13,986	14,505	118.60
SEP	627	36	13,898	205	14,139	14,766	111.02
OCT	2,602	90	13,898	987	14,974	17,576	42.43
NOV	7,214	134	13,898	655	14,687	21,901	18.99
DEC	17,490	215	13,898	1,150	15,263	32,754	15.92
JAN	18,730	281	13,898	1,631	15,810	34,540	14.04
FEB	9,901	185	13,898	429	14,512	24,413	13.26
MAR	8,990	201	13,898	986	15,085	24,074	13.79
APR	4,007	133	13,898	487	14,518	18,525	22.87
MAY	422	19	13,898	(252)	13,665	14,087	126.34
JUN	750	42	13,898	277	14,217	14,967	88.04
						247,198	22.18

KY effect	Commodity	Transport				Total	
		Spectra	Monthly	Flow KY	Sub total		
Month							
JUL	31,473	1,644	-	3,575	5,219	36,692	6.47
AUG	29,102	1,643	-	3,196	4,840	33,941	4.95
SEP	28,682	1,636	-	2,837	4,473	33,155	5.45
OCT	45,860	1,586	-	6,061	7,648	53,508	7.33
NOV	83,646	1,551	-	25,098	26,649	110,296	8.25
DEC	118,262	1,455	-	25,932	27,388	145,650	10.47
JAN	93,117	1,398	-	22,667	24,065	117,182	9.58
FEB	78,824	1,475	-	27,718	29,192	108,016	7.37
MAR	65,805	1,468	-	22,413	23,882	89,687	7.02
APR	46,009	1,531	-	11,589	13,121	59,130	6.36
MAY	35,879	1,650	-	11,599	13,249	49,128	5.18
JUN	28,667	1,619	-	3,971	5,589	34,257	5.27
						870,641	7.37



## Largest Industrial Customer

Month	Usage in CCF	Tariff		Commodity \$ 7.66	Current Total	Commodity with B&W incrs	Projected Total	Increase
		Monthly	Flow					
		14	2.22 / 0.795					
JUL	239	14	203	183	400	2,831	3,048	
AUG	20	14	29	15	58	237	280	
SEP	129	14	115	99	228	1,432	1,562	
OCT	1,731	14	1,389	1,325	2,728	7,345	8,748	
NOV	335	14	279	256	550	636	929	
DEC	2,119	14	1,697	1,622	3,334	3,374	5,085	
JAN	6,572	14	5,238	5,031	10,283	9,229	14,481	
FEB	1,467	14	1,179	1,123	2,316	1,945	3,138	
MAR	2,155	14	1,726	1,650	3,390	2,971	4,711	
APR	2,579	14	2,063	1,974	4,051	5,897	7,975	
MAY	5	14	11	4	29	63	88	
JUN	814	14	660	623	1,297	7,167	7,841	
	18,165				28,664		57,885	29,221
				per MCF	15.78		31.87	102%

## Smallest continuous Residential Customer

Month	Usage in CCF	Tariff		Commodity \$ 7.66	Current Total	Commodity with B&W incrs	Projected Total	Increase
		Monthly	Flow					
		9	1.665 / 0.795					
JUL	4	9	7	3	19	47	63	
AUG	3	9	5	2	16	36	50	
SEP	4	9	7	3	19	44	60	
OCT	5	9	8	4	21	21	39	
NOV	23	9	26	18	53	44	79	
DEC	29	9	31	22	62	46	86	
JAN	30	9	32	23	64	42	83	
FEB	37	9	37	28	75	49	95	
MAR	28	9	30	21	61	39	78	
APR	7	9	12	5	26	16	37	
MAY	6	9	10	5	24	76	95	
JUN	5	9	8	4	21	44	61	
	181				459		825	365
				per MCF	25.37		45.56	80%

## Average TN Residential Customer

	Usage in CCF	Tariff		Commodity	Current Total	Commodity with B&W incrs	Projected Total	Increase
		Monthly 9	Flow 1.665 / 0.795	\$ 7.66				
Month								
JUL	7	9	12	5	26	83	104	
AUG	8	9	13	6	28	95	117	
SEP	7	9	12	5	26	78	98	
OCT	15	9	20	11	40	64	92	
NOV	57	9	53	44	106	108	170	
DEC	74	9	67	57	132	118	193	
JAN	85	9	75	65	149	119	204	
FEB	75	9	67	57	134	99	176	
MAR	64	9	59	49	117	88	156	
APR	25	9	28	19	56	57	94	
MAY	7	9	12	5	26	88	109	
JUN	6	9	10	5	24	53	72	
	430				864		1,586	721
				per MCF	20.10		36.88	83%

**EXHIBIT 1**



10025 Investment Dr.  
Suite 160  
Knoxville, TN 37932

Invoice

Date	Invoice #
1/31/2019	385

**Bill To**

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

P.O. No.

Terms

Project

1 Customer Base Use Charge (Navitas Utilities)

13,897.67

13,897.67

Gas Transported During January 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 check payable to B&W PIPELINE, LLC

**Total**

**\$13,897.67**

Phone #

1-865-240 0167

E-mail

talktous@enrema.com

Invoice



10025 Investment Dr.  
Suite 160  
Knoxville, TN 37932

Date	Invoice #
1/31/2019	386

**Bill To**

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

P.O. No.	Terms	Project
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1.847	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers Gas Transported During January 2019	MCF	0.3081	569.06
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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 check payable to B&W PIPELINE, LLC

**Total** \$569.06

Phone #

1-865-240-0167

E-mail

talktous@eurema.com



9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
2/28/2019	389

**Bill To**

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

P.O. No.	Terms	Project
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1 Customer Base Use Charge (Navitas Utilities)

13,897.67

13,897.67

Gas Transported During February 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 check payable to B&W PIPELINE, LLC

**Total**

**\$13,897.67**

Phone #

1-865-240-0167

E-mail

talktous@eurema.com



9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
2/28/2019	390

**Bill To**

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

P.O. No.	Terms	Project

2.087	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers Gas Transported During February 2019	MCF	0.3081	643.00
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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 check payable to B&W PIPELINE, LLC

**Total** \$643.00

Phone #

1-865-240-0167

E-mail

talktous@enrenna.com





9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
3/31/2019	393

Bill 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)  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		13,897.67	13,897.67
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$13,897.67</b>
Phone #	1-865-240-0167	E-mail	talktous@enrema.com	

Invoice



9534 Morgan County Hwy  
Sunbright, TN 37872

Date	Invoice #
3/31/2019	394

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

P.O. No.	Terms	Project

Quantity	Description	U/M	Rate	Amount
2,093	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers 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	MCF	0.3081	644.85

Please make your check payable to B&W PIPELINE, LLC

**Total** \$644.85

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
4/30/2019	397

Bill 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)  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		13,897.67	13,897.67
Please make your check payable to B&W PIPELINE, LLC			Total	\$13,897.67

Phone #	1-865-240-0167	E-mail	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
4/30/2019	398

<b>Bill To</b>
Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

P.O. No.	Terms	Project

Quantity	Description	U/M	Rate	Amount
903	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers 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	MCF	0.3081	278.21

Please make your check payable to B&W PIPELINE, LLC

**Total** \$278.21

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
4/30/2019	398

<b>Bill To</b>
Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92626

P.O. No.	Terms	Project

Quantity	Description	U/M	Rate	Amount
903	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers 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	MCF	0.3081	278.21
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$278.21</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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## Invoice



9534 Morgan County Hwy  
Sunbright, TN 37872

Date	Invoice #
5/31/2019	399

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
286	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers 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	MCF	0.3081	88.12
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$88.12</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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Invoice

 **B&W Pipeline**  
9534 Morgan County Hwy  
Sunbright, TN 37872

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)  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		13,897.67	13,897.67
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$13,897.67</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

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  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	MCF	2.7172	22,957.62
Please make your check payable to B&W PIPELINE, LLC			Total	\$22,957.62
Phone #	1-865-240-0167	E-mail	talktous@enrema.com	



9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

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	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - January 2018	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
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	

Phone #	1-865-240-0167	E-mail	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

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	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate - March 2019	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

Please make your check payable to B&W PIPELINE, LLC

Total

Phone #	1-865-240-0167	E-mail	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
4/30/2019	402

<b>Bill To</b>
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
	Interest accrued on unpaid invoices as per the FERC published Interest rates  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		22,248.30	22,248.30
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$593,675.47</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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Invoice

 **B&W Pipeline**  
9534 Morgan County Hwy  
Sunbright, TN 37872

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
	<p>Interest accrued during June 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</p> <p>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</p>		2,571.42	2,571.42
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$2,571.42</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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Invoice



9534 Morgan County Hwy  
Sunbright, TN 37872

Date	Invoice #
6/30/2019	406

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
7,019	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate Gas Transported During June 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	MCF	2.7172	19,072.03

Please make your check payable to B&W PIPELINE, LLC

**Total** \$19,072.03

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enurema.com
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Invoice



9534 Morgan County Hwy  
Sunbright, TN 37872

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)  Gas Transported During June 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		13,897.67	13,897.67

Please make your check payable to B&W PIPELINE, LLC

**Total** \$13,897.67

Phone #	1-865-240-0167	E-mail	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
6/30/2019	408

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
424	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers Gas Transported During June 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	MCF	0.3081	130.63
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$130.63</b>

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

 **B&W Pipeline**  
 9534 Morgan County Hwy  
 Sunbright, TN 37872

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	

Quantity	Description	U/M	Rate	Amount
301	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers (Navitas TN NG, LLC) Gas Transported During July 2019  Services Have Been Rendered At The Date of The Invoice This Invoice Is Due in Full 30 Days From The Date Shown Above	MCF	0.3081	92.74
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$92.74</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

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 Charge (Navitas TN NG, LLC)  Gas Transported During July 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		13,897.67	13,897.67
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$13,897.67</b>

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



9534 Morgan County Hwy  
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 Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate (Navitas KY NG, LLC) Gas Transported During July 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	MCF	2.7172	19,017.68
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$19,017.68</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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Invoice



9534 Morgan County Hwy  
Sunbright, TN 37872

Date	Invoice #
7/31/2019	414

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
	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 check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$2,793.61</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

Date	Invoice #
8/31/2019	415

<b>Bill To</b>
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 NG, LLC)  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		13,897.67	13,897.67

Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$13,897.67</b>
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<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

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	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Byrdstown, TN City Gate and Directly Connected Customers (Navitas TN NG, LLC) 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	MCF	0.3081	65.01
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$65.01</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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9534 Morgan County Hwy  
Sunbright, TN 37872

Invoice

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	Natural Gas Transportation Service Volumetric Charges For Natural Gas Delivered To Albany, KY City Gate (Navitas KY NG, LLC) 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 the interest rate determined by the FERC per Month Late Payment Penalty	MCF	2.7172	18,286.76

Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$18,286.76</b>
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<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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Invoice



9534 Morgan County Hwy  
Sunbright, TN 37872

Date	Invoice #
8/31/2019	418

Bill To
Navitas Utility Corporation 3186 Airway Avenue Unit D. Costa Mesa CA 92628

P.O. No.	Terms	Project
	Net 30	

Quantity	Description	U/M	Rate	Amount
	<p>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)</p> <p>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</p>		2,883.25	2,883.25
Please make your check payable to B&W PIPELINE, LLC			<b>Total</b>	<b>\$2,883.25</b>

<b>Phone #</b>	1-865-240-0167	<b>E-mail</b>	talktous@enrema.com
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