



Henry Walker
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January 8, 2020

VIA ELECTRONIC FILING

Tennessee Public Utility Commission
502 Deaderick Street
Nashville, TN 37243

Docket No. **20-00004**

Please accept for filing the attached Complaint of B&W Pipeline against Navitas TN for the submission of a fraudulent invoice, dated December 10, 2019, for \$344,515.49.

Upon reviewing the invoice, counsel for B&W Pipeline wrote Navitas TN that the invoice appeared to be fraudulent and that unless the invoice was withdrawn, B&W Pipeline would file a complaint with the Commission. A copy of the warning letter is attached.

Counsel for Navitas TN subsequently informed counsel for B&W Pipeline that Navitas TN would not withdraw the invoice. B&W Pipeline therefore files this Complaint.

Please contact me at 615-252-2363 or hwalker@bradley.com if you have any questions about this filing.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:


Henry Walker

HW/dbi
Attachments
cc: Don Baltimore
Klint Alexander
Thomas Hartline



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

December 12, 2019

VIA EMAIL

Mr. Thomas Hartline
NAVITAS COMPANIES
3186-D Airway Avenue
Costa Mesa, CA 92626

Re: B&W Pipeline Invoice dated December 10, 2019

Dear Mr. Hartline:

B&W Pipeline has received your letter dated December 10, 2019 purporting to bill B&W Pipeline \$344,515.49 because "B&W Pipeline and/or its affiliates involved in gas flooding operations for oil production" received "regulated natural gas services" from Navitas TN between July 1, 2017 and December 31, 2017. According to the tariff of Navitas TN, the only regulated service provided by Navitas TN is the sale of gas to its residential, commercial, industrial, public and institutional customers located within the utility's service area. The invoice therefore implies that "B&W Pipeline and/or its affiliates" purchased gas from Navitas TN pursuant to the company's Tennessee tariff and that it has only recently "come to our [Navitas'] attention" that Navitas TN failed to send B&W Pipeline any invoices for six months and over \$300,000 of gas purchases in 2017.

Unless you notify B&W Pipeline by the close of business on December 16, 2019 that Navitas TN has withdrawn this purported invoice for gas purchases, B&W will file a complaint with the Tennessee Public Utility Commission. In my opinion, this attempt by Navitas TN to collect \$344,515.48 from B&W Pipeline is illegal and violates, inter alia, T.C.A. § 65-4-122(b) and T.C.A. § 65-5-104. I also believe that you are aware that this invoice is illegitimate and that you have sent it only for the purpose of using it as a bargaining tactic to try to avoid paying interstate transportation charges owed to B&W Pipeline by Navitas KY (an affiliate of Navitas TN). Such intentional, fraudulent actions by a state – regulated public utility, if not immediately corrected, may and should result in serious consequences for Navitas TN.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:


Henry Walker

HW/dbi

cc: Don Baltimore
Klint Alexander

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

B&W Pipeline, LLC)	
)	
v.)	Docket No. <u>20-00004</u>
)	
Navitas TN NG, LLC)	

COMPLAINT

B&W Pipeline, LLC (“B&W” or “B&W Pipeline”) files this Complaint against Navitas TN NG, LLC (“Navitas TN”) pursuant to T.C.A. § 65-4-117. Navitas TN is attempting to bill and collect from B&W charges totaling \$344,515.48 supposedly for the purchase of 38,276 Mcfs of natural gas between July 1, 2017 and December 31, 2017. To put that number in perspective, the amount of gas allegedly taken by B&W Pipeline is more than half of the total volume of gas carried over the pipeline during the six-month period covered by the invoice. The charges are fictitious. B&W is a pipeline, not a gas distribution company or gas customer, and has never purchased natural gas from Navitas TN or anyone else.

As described in the following paragraphs, Navitas TN recently sent B&W an invoice purporting to back bill the pipeline for six months of gas purchases made two years earlier. The invoice is not a legitimate bill for the provision of regulated service but a sham created to offset a comparable amount of money owed to B&W by Navitas KY, which is an affiliate of Navitas TN, for interstate gas transportation at rates recently approved by the Federal Energy Regulatory Commission (“FERC”). Navitas KY has tacitly admitted as much to the Kentucky Public Service Commission (“KPSC” or the “Kentucky Commission”), telling the state agency that the invoice was being sent to B&W Pipeline in retaliation for B&W’s attempt to bill and collect the FERC-approved rates. *See* paragraph 18, *infra*.

B&W did its job by delivering to Navitas TN and Navitas KY the gas they purchased and charging them the appropriate tariffed rates for that transportation service. Navitas TN's invoice to B&W – which has never purchased gas from anyone and which has no contract with Navitas TN to purchase gas – is fraudulent.

These allegations, if shown to be credible, warrant the opening of a “show cause” investigation of Navitas TN pursuant to T.C.A. § 65-2-106 for intentionally charging illegal rates in violation of T.C.A. § 65-4-122(b) and § 65-5-104(a)(1) and the imposition of substantial financial and other penalties.

The Parties

1. B&W Pipeline is a natural gas pipeline approximately fifty miles long located entirely in northeast Tennessee. B&W holds a certificate from the Tennessee Public Utility Commission (“TPUC” or the “Tennessee Commission”) to provide intrastate gas transportation services and a certificate from the Federal Energy Regulatory Authority to provide interstate transportation services. The company's local address is 9534 Morgan County Highway, Sunbright, TN 37872.

2. Navitas TN is a local gas distribution company holding a certificate from the Tennessee Commission to provide retail, natural gas service to end users in Tennessee. The company's principal office is located at 3186 Airway Avenue, Suite D, Costa Mesa, CA 92626. Navitas TN pays B&W Pipeline pursuant to B&W's intrastate tariff to transport gas in intrastate commerce to serve customers in Byrdstown and in Fentress County, Tennessee.

3. Navitas KY NG LLC (“Navitas KY”), an affiliate of Navitas TN, is a local gas distribution company holding a certificate from the Kentucky Commission. Navitas KY provides

retail, natural gas service to end users in Albany, Kentucky and pays B&W to transport gas in interstate commerce pursuant to B&W's interstate tariff under the jurisdiction of the FERC.¹

Allegations of Fact

4. In order to obtain natural gas to serve customers in Albany, Kentucky and in Byrdstown and Fentress County, Tennessee, Navitas TN and Navitas KY purchase gas from gas producers. Some of the gas purchased from producers is delivered via East Tennessee Natural Gas Pipeline ("East Tennessee") to the southern end of B&W Pipeline. From there, it is carried north by B&W. The Navitas companies also purchase gas from Sparta Energy ("Sparta"), formerly called FWM Energy, LLC ("FWM"). Sparta is a B&W affiliate that sells gas from nearby wells that are owned by B&W affiliates. Gas from those wells enters the B&W line at three taps. Those taps, which refer to the gas fields from which the gas is taken, are called (beginning at B&W's southern end) "Gemini," "Silver Pine," and "Shale Gas." The gas from the wells in those fields is delivered by Sparta to B&W where the gas is commingled with the gas from East Tennessee and carried north for delivery to B&W's customers.

5. All of the gas transported via B&W comes either from East Tennessee (gas purchased by the Navitas companies from producers and delivered by East Tennessee) or from local gas wells owned by B&W affiliates as described in paragraph 4, *supra*. Once gas enters the B&W line, it is commingled with gas from other sources. The commingling of gas from various sources does not affect a shipper's obligation to pay transportation charges for the amount of gas delivered by the pipeline. B&W's interstate tariff (referred to by the FERC as a "Statement of Operating Conditions") states in Section 6.14 that "it is understood and agreed" that gas delivered

¹ Although B&W is physically located in Tennessee, some of the gas carried by the pipeline is delivered to Navitas KY at a point in Tennessee near the Tennessee-Kentucky border and is ultimately consumed in Kentucky. Gas that is carried by B&W in one state but consumed in another state is considered gas in interstate commercial transport under federal law even though the pipeline itself is wholly located in Tennessee.

by B&W “will not be identical” to the gas that was delivered by the shipper for transportation but that the shipper’s gas will be commingled with other gas and “the commingled gas may be substituted for Shipper’s Gas on a heat-equivalent basis.”² B&W’s Tennessee tariff similarly states that B&W “may commingle gas for delivery . . . with other volume in its possession.” B&W Pipeline Gas Tariff TRA No. 1, Original Sheet No. 3.

6. During the six-month period between July 1, 2017 and December 31, 2017, B&W Pipeline had three customers: Navitas TN, Navitas KY and a company called Rugby Energy, LLC (“Rugby”), later called TOM Energy, LLC. Rugby, which no longer exists, was an affiliate of B&W Pipeline. Rugby owned oil wells in an area called the Parker Lane Oil Field and used natural gas to extract oil from those wells. The gas used to extract oil, called “extraction gas,” was delivered by B&W to the Parker Lane Oil Field which is located about midway on the B&W line and downstream from the three taps described in paragraph 4, *supra*. Pursuant to B&W’s intrastate tariff, Rugby paid B&W a flat rate of \$3,655 per month and a volumetric rate of \$0.3081 per Mcf to deliver this extraction gas to the Parker Lane Oil Field.³

² A copy of B&W’s FERC-approved tariff is on file in TPUC Docket 15-00042 (filed May 24, 2019).

³ Rugby and TOM Energy no longer inject gas and no other gas carried by B&W is being used for oil extraction. Since May, 2018, B&W Pipeline’s only customers have been Navitas TN and Navitas KY.

In a Final Order issued December 27, 2019 in Docket 19-00084, the Tennessee Commission noted on p. 9 that B&W’s Settlement Agreement with FERC (see paragraph 9, *infra*) “forecast 21,900 Mcfs of additional interstate billing units to serve its [B&W] affiliate Titan Energy” and, therefore, the Commission found it “unclear whether all of B&W’s affiliate activities on the pipeline have ceased or when such activities may have ceased.” The Final Order is incorrect, in part. Titan Energy was an affiliate of Gasco, former owner of the pipeline, not an affiliate of B&W. *See* Settlement Agreement, Article III, Section A. In the settlement, the parties agreed that when Titan Energy was sold to the current owners of B&W, the new owners hoped to develop wells in the area and sell gas in the interstate market. The settlement therefore includes “an adjustment [of 21,900 Mcfs] to the actual test year [2016] billing units to incorporate a level of volumes for transporting local production to East Tennessee Natural Gas, LLC,” *i.e.*, the pipeline flow would be reversed to carry gas to, not from, East Tennessee.” *See* Article III, Section E. That anticipated transportation of gas to the interstate market has not occurred although, as part of the Settlement Agreement, B&W agreed to include “a minimum of 110,000 Mcf for interstate transportation billing units in future rate filings before the FERC as long as there are no major rate changes to the system.” *Id.* This agreed-upon increase in interstate billing units during the test year has nothing to do with B&W’s intrastate delivery of gas to Rugby at the Parker Lane Oil Field. Those oil extraction operations ceased by May, 2018.

7. During the period July 1, 2017 through December 31, 2017, a total of 37,620 Mcfs of gas that had been purchased by the Navitas companies from a gas producer were delivered by East Tennessee to B&W Pipeline. During the same, six-month period, the three taps controlled by FWM, a B&W affiliate, added another 30,589 Mcfs of gas to the pipeline. The gas from these taps was commingled with the gas from East Tennessee. From the 30,589 Mcfs added to the pipeline from the three taps, 17,287 Mcfs of gas were sold to the Navitas companies by FWM. That left 13,302 Mcfs of gas from the taps for Rugby's use, although Rugby took only 11,811 Mcfs of gas during this period.

8. At bottom, the only issue is whether the Navitas companies received the same amount of gas that they had delivered to B&W for shipment. At the southern end of the pipeline, the Navitas companies delivered a total of 54,904 Mcfs to B&W Pipeline (37,620 Mcfs from East Tennessee and 17,287 Mcfs taken from the three taps and billed by FWM). At the northern end, B&W delivered 6,321 Mcfs to Navitas TN and 46,852 Mcfs to Navitas KY. That is a total of 53,173 Mcfs received by the Navitas companies or 96.8% of the total amount the companies had delivered to the pipeline.⁴

9. On May 17, 2019, the FERC entered a final order authorizing B&W Pipeline to charge a rate of \$2.7172 per Mcf on all gas shipped in interstate commerce. The FERC rate was made effective as of July 17, 2017 and applies to all gas transported via B&W to Navitas KY.

10. On August 6, 2019, the Kentucky Commission approved on an interim basis an increase in the gas transportation charges paid by the customers of Navitas KY to cover the FERC

⁴ On any pipeline, a small amount of gas is typically lost between the point of entry and the point of delivery. Described by regulators as "Shrinkage," "Line Loss," or "Unaccounted for Gas," such losses are mainly attributed to limitations in measurement equipment, theft, and gas used during pipeline operations. B&W's Tennessee tariff refers to this lost gas as "Shrinkage" and states that the pipeline "will retain up to ten percent (10.0%) of all volumes delivered." Tariff, Original Sheet No. 3. In this case, the total amount received by the Navitas companies was only 3.2% less than the total amount of gas the Navitas companies had purchased and delivered to the pipeline for transportation.

transportation rate on a prospective basis. *See* KPSC Docket 2019-00241. The Kentucky Commission is currently considering a request by Navitas KY to add a surcharge to the bill of each of the company's Kentucky customers to cover the arrearage (approximately \$340,000 as of September 1, 2019) owed by Navitas KY to B&W as a result of the FERC rate being made effective July 17, 2017. *See* KPSC Docket 2019-00430.

11. On December 10, 2019, Navitas TN sent B&W an invoice for \$344,515.49 for "regulated natural gas services" provided by Navitas TN to "B&W Pipeline and/or its affiliates" between July 1, 2017 and December 31, 2017. A copy of the invoice is attached as Exhibit A. The invoice states, "It has come to our attention that B&W Pipeline and/or its affiliates involved in gas flooding [i.e., extraction] operations for oil production have not received invoices for regulated natural gas services provided by Navitas TN NG LLC from the usage period of July 1, 2017 to December 31, 2017." The invoice purports to include six months of allegedly overlooked monthly bills from Navitas TN to B&W for the purchase of gas during that period.

12. B&W is a pipeline, not a gas distribution company or gas customer, and has never purchased gas from Navitas TN or anyone else.

13. As described in paragraphs 7 and 8, *supra*, metered amounts of gas were received by B&W Pipeline from several sources, commingled, and then delivered, also in metered amounts, to the pipeline's customers. Taking into account a small amount of "Shrinkage," "Line Loss" or "Unaccounted for Gas" (see footnote 4, *infra*), the total amount of gas delivered to B&W by the Navitas companies for transportation was equal to the total amount of gas received by the two Navitas companies from B&W Pipeline. Navitas TN's invoice claiming that over 38,000 Mcfs of gas were allegedly purchased or taken by B&W is demonstrably false and an intentional misuse

of the utility's state-granted and state-regulated authority to bill for service in accordance with its tariff.

14. From statements made by Navitas KY to the Kentucky Commission (*see* paragraph 18, *infra*) and from the volume of monthly gas "purchases" shown on Navitas TN's invoice, it appears that Navitas TN is claiming that the gas purchased during this period by the Navitas companies and delivered by East Tennessee (about 38,000 Mcfs) was all used by Rugby for oil extraction and that B&W Pipeline, an affiliate of Rugby, should pay for that gas.

15. This claim is wrong, in both small ways and large ones. First, if anyone purchased gas delivered by the pipeline, it was Rugby, not the pipeline, and the amount of gas used by Rugby was only 11,811 Mcfs, not the 38,276 Mcfs shown on Navitas TN's invoice. Second, as previously discussed, the Mcfs of gas delivered to Rugby were made up of gas delivered by East Tennessee commingled with roughly equal amounts of gas taken from wells owned by other B&W affiliates. Since natural gas is not color-coded, no one can say whether the Mcfs of gas taken by Rugby was the same Mcfs of gas that had been delivered by East Tennessee. Third, as discussed in paragraph 8, B&W Pipeline delivered to Navitas TN and Navitas KY the same amount of gas that the shippers had purchased and delivered to the pipeline for transportation.

16. Under these circumstances, there is no basis for Navitas TN's claim that the East Tennessee gas is the same gas that was delivered to Rugby or that the gas from East Tennessee was diverted and sold to someone else. As previously explained, the gas delivered to Rugby consisted of gas from East Tennessee commingled with gas from the taps at Gemini, Silver Pine, and Shale Gas, all of which are located upstream from Rugby's oil field. But even if the taps were located downstream from the oil field, B&W's federal and state tariffs make clear that a shipper has no right to insist that Mcfs of gas purchased by the shipper from one source be "identical" to

the Mcfs of gas that arrive at the other end of the pipeline. As long as a shipper receives the quantity and quality of gas to which he is entitled, he cannot object if gas he has purchased is commingled with gas from other sources, nor can he credibly claim that “his” gas was sold to another customer. As discussed in paragraph 8, the Navitas companies ultimately received 96.8% of the commingled gas delivered by East Tennessee and billed by FWM.

17. Finally, there were no communications between the parties to indicate that either party discussed, much less agreed to, a sale of gas from Navitas TN to B&W Pipeline. To claim that over 38,000 Mcfs of gas were sold by a gas distribution company to a gas pipeline for \$7.55 per Mcf (the tariffed, retail rate of Navitas TN) without any record or discussion of the transaction is further evidence that no sale occurred and the invoice is a sham.

18. Navitas KY has admitted in a filing with the Kentucky Commission that Navitas TN is trying to collect the December 10 invoice from B&W in retaliation for B&W’s efforts to collect the FERC-approved rate for the interstate transportation of gas delivered to Navitas KY. In an “Application” for a rate surcharge to pay the arrearage resulting from the FERC order, Navitas KY stated the following:

“30. Furthermore, other factors affecting the amount of the arrearage at issue in this Application include the amount owed by B&W to Navitas for oil flooding [extraction] operations in Tennessee. For a substantial period of time, B&W Pipeline took the Navitas gas from the Spectra East Tennessee Pipeline and delivered it to its affiliate, FWM, to flood its oil field production operations. It then replaced that gas with its own production further down the line. By verbal agreement with B&W, Navitas agreed not to charge B&W as a Tennessee customer, as it was legally

entitled to do, for the gas supply from Spectra due to the gas swap.^[5]
However, in view of B&W's current effort to now charge Navitas the FERC-approved transportation rate for this gas flowing through its pipeline, Navitas is entitled to collect payment (Tennessee tariff of \$7.55 per MCF) for the Spectra gas taken by B&W. For its part, Navitas, in an effort to protect its Kentucky customers, is willing to contribute these funds toward the arrearage.”

See “Application,” at pp. 8-9 (emphasis added), filed November 18, 2019, KPSC Docket No. 2019-00430, https://psc.ky.gov/PSCSCF/2019%20cases/2019-00430/20191127_Navitas%20KY%20NG,%20LLC%20Application.pdf. Although Navitas TN has no legitimate claim for payment, Navitas KY nevertheless told the Kentucky Commission that Navitas had a “verbal agreement” with B&W (that no one at B&W can recall) in which Navitas “agreed not to charge B&W” for the extraction gas used by Rugby but that “in view of B&W’s current effort to now charge Navitas the FERC-approved transportation rate for this gas,” Navitas TN has now decided to try to collect nearly \$350,000, which is about the same amount as the FERC arrearage, for gas sales that allegedly occurred over two years ago. Moreover, as if to justify this fraudulent attempt to sell the same gas twice, Navitas KY promised the Kentucky Commission to use all of the intrastate revenue from this alleged sale of gas in Tennessee to offset the interstate arrearage owed by Navitas KY. Based on the meter-recorded evidence of the gas delivered by

⁵ The description of the “gas swap” implies that all the gas from East Tennessee was delivered to Rugby and then replaced with or “swapped for” gas purchased from FWM. That description is not accurate. As explained in paragraphs 4 through 8, *supra*, all of the gas delivered to B&W’s three customers consisted of gas from East Tennessee commingled with a roughly equal amount of gas inserted into the pipeline at one or more of the three taps that are all upstream from the Parker Lane Oil Field. In other words, the gas from the three taps was commingled with gas from East Tennessee before any gas was delivered to Rugby or either of the Navitas companies.

B&W and these self-incriminating statements by Navitas KY, it cannot be more clear that the December 10 invoice is a bad faith attempt to collect a fictitious bill.⁶

Conclusion

19. The invoice from Navitas TN for the sale of over 38,000 Mcfs of gas to B&W Pipeline is a sham. Navitas TN is well aware that no sale occurred and that B&W delivered to the Navitas companies virtually the same amount of gas that the Navitas companies had purchased. The sole reason for sending the invoice is to create a fictitious debt to offset interstate transportation charges owed to B&W by Navitas KY.

20. Knowingly billing a false invoice is a civil, if not criminal, offense and one of the most serious offenses a rate-regulated utility can commit. These allegations warrant the opening of a “show cause” investigation against Navitas TN and the imposition of substantial penalties including, if appropriate, the revocation of the company’s Tennessee certificate and referral to a district attorney general for criminal prosecution pursuant to T.C.A. §§ 65-3-119, 120, and 121. See T.C.A. § 65-4-105(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
Nashville, TN 37203

⁶ If any further evidence is needed to demonstrate that Navitas TN is aware that the December 10 invoice is fictitious, the Commission may take note of the fact that there is no mention of the hundreds of thousands of dollars allegedly owed to Navitas TN in any of the utility’s quarterly or annual reports to the Commission, the utility’s pending rate case (TPUC Docket No. 19-00057) or the company’s recent emergency filing. TPUC Docket No. 19-00084. The Commission may also note that Navitas TN has not sent B&W any invoices for the purchase of gas prior to July 1, 2017 or after December 31, 2017 even though B&W was delivering extraction gas to Rugby from April 2016 until May, 2018.

615-252-2363

hwalker@bradley.com

Attorney for B&W Pipeline, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of January, 2020, 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

**Invoice dated December 10, 2019
from Navitas TN to B&W Pipeline**



December 10, 2019

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

via email: jduran@enrema.com

RE: Request for Payment

Dear Mr. Duran:

It has come to our attention that B&W Pipeline and/or its affiliates involved in gas flooding operations for oil production has not received invoices for regulated natural gas services provided by Navitas TNNG, LLC from the usage period of July 1, 2017 to December 31, 2017. Enclosed for payment are your updated invoices in the total amount of \$344,515.48.

Your balance is in accordance with the schedule of approved rates as ordered by the Tennessee Regulatory Authority and in effect at the time of your usage. For your convenience the rates are reprinted below. Please note that credits for commodity payment have already been issued.

Customer charge per month	\$14.00
First nine CCF per month	\$2.885
Greater than nine CCF per month	\$0.755

Monthly invoices are attached for your convenience. Please make prompt payment of all amounts owed. If you prefer, we can set up a payment schedule in order to accommodate your needs.

Please direct any questions to Thomas Hartline, Navitas TN NG, LLC, (714) 242-4064, thartline@navitasutility.com.

Sincerely,


Thomas Hartline

TH/BB

CC: Don Baltimore, Navitas TNNG, LLC regulatory counsel
Klint Alexander, Navitas KYNG, LLC regulatory counsel
Henry Walker, B&W Pipeline counsel
Tennessee Public Utility Commission

Customer Transaction Summary

Customer Information

Account No: 600006677
 B&W PIPELINE
 9534 MORGAN COUNTY HIGHWAY
 SUNBRIGHT,

Location Information

Location No: 000000000010000
 B&W CITY GATE

Date	Type	More Info	Reading	Usage	Prior Balance	Transaction Amount	Balance
08/07/2017	Adjustment		0	8350	0.00	10167.98	10167.98
08/09/2017	Adjustment				10167.98	-2907.47	7260.51
09/07/2017	Adjustment		0	53710	7260.51	65213.24	72473.75
09/08/2017	Adjustment				72473.75	-18701.82	53771.93
10/07/2017	Adjustment		0	45770	53771.93	55577.89	109349.82
10/08/2017	Adjustment				109349.82	-15937.11	93412.71
11/07/2017	Adjustment		0	87750	93412.71	103403.72	196816.43
11/08/2017	Adjustment				196816.43	-27720.23	169096.20
12/07/2017	Adjustment		0	82330	169096.20	97019.01	266115.21
12/08/2017	Adjustment				266115.21	-26008.05	240107.16
01/07/2018	Adjustment		0	121070	240107.16	142654.33	382761.49
01/08/2018	Adjustment				382761.49	-38246.01	344515.48

Navitas TN NG, LLC
PO Box 183
Eakly, OK 73033
(866) 797-3342

TYPE OF SERVICE	METER READING		USED	CHARGES
	PRESENT	PREVIOUS		

Tariff	0	0	0	0.00
Meter Factor	1.00000	Adjust Usage		

Purchase Gas Adj	0.00
Customer + Energy Efficiency Charge	0.00
Tax	0.00
Previous Balance	10167.98

000000000010000
Service from 01/01/2017 to 08/07/2017
ACCOUNT 600006677 08/07/2017

METER READ		TOTAL DUE	LATE CHARGES	IF LATE
MONTH	DAY	UPON RECEIPT	AFTER DUE DATE	PAY:

8	7	10167.98	362.33	10530.31
---	---	----------	--------	----------

Purchase Gas Adj. = 0.8684
Visa/MC Accepted | SAVE A STAMP! SIGN UP FOR ACH TODAY!
Small Gas??? Phone 866-578-3303

FIRST-CLASS MAIL
U.S. POSTAGE
PAID
EAKLY
PERMIT NO.
2

Route	Account	Due Date
NONE	600006677	08/31/2017

TOTAL AMOUNT	IF LATE
TO BE PAID	PAY:
10167.98	10530.31

MAIL THIS STUB WITH YOUR PAYMENT

B&W PIPELINE
9534 MORGAN COUNTY HIGHWAY
SUNBRIGHT,

Learn Why Excess Flow Valves Are Important
www.navitasutility.com/efv

Navitas TN NG, LLC
 PO Box 183
 Eakly, OK 73033
 (866) 797-3342

TYPE OF SERVICE	METER READING PRESENT	PREVIOUS	USED	CHARGES
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Tariff 0 0 0 0.00
 Meter Factor 1.00000 Adjust Usage

Purchase Gas Adj 0.00
 Customer + Energy Efficiency Charge 0.00
 Tax 0.00
 Previous Balance 72473.75

000000000010000
 Service from 01/01/2017 to 08/07/2017
 ACCOUNT 600006677 09/07/2017

METER READ MONTH	TOTAL DUE UPON RECEIPT	LATE CHARGES AFTER DUE DATE	IF LATE PAY:
------------------	------------------------	-----------------------------	--------------

8 7 72473.75 2687.20 75160.95

Purchase Gas Adj = 0.8684
 Visa/MC Accepted | SAVE A STAMP! SIGN UP FOR ACH TODAY!
 Small Gas?? Phone 866-579-3303

FIRST-CLASS MAIL
 U.S. POSTAGE
 PAID
 EAKLY
 PERMIT NO.
 2
 CUSTOMER
 Route Account Due Date
 NONE 600006677 10/01/2017
 TOTAL AMOUNT TO BE PAID IF LATE
 72473.75 75160.95
 MAIL THIS STUB WITH YOUR PAYMENT

B&W PIPELINE
 9534 MORGAN COUNTY HIGHWAY
 SUNBRIGHT,

Learn Why Excess Flow Valves Are Important
www.navitasutility.com/efv

Navitas TN NG, LLC
 PO Box 183
 Eakly, OK 73033
 (866) 797-3342

TYPE OF SERVICE	METER READING		USED	CHARGES
	PRESENT	PREVIOUS		

Tariff 0 0 0 0.00
 Meter Factor 1.00000 Adjust Usage

Purchase Gas Adj 0.00
 Customer + Energy Efficiency Charge 0.00
 Tax 0.00
 Previous Balance 109349.82

000000000010000

Service from 01/01/2017 to 08/07/2017

ACCOUNT 600006677 10/07/2017

METER READ MONTH	DAY	TOTAL DUE UPON RECEIPT	LATE CHARGES AFTER DUE DATE	IF LATE PAY:

8 7 109349.82 4668.54 114018.4

Purchase Gas Adj. = 0.8684
 Visa/MC Accepted | SAVE A STAMP! SIGN UP FOR ACH TODAY!
 Smell Gas??? Phone 866-579-3303

FIRST-CLASS MAIL
 U.S. POSTAGE
 PAID
 EAKLY

PERMIT NO.
 2

CUSTOMER
 Route Account Due Date
 NONE 600006677 10/31/2017

TOTAL AMOUNT IF LATE
 TO BE PAID PAY:
 109349.8 114018.4

MAIL THIS STUB WITH YOUR PAYMENT

B&W PIPELINE
 9534 MORGAN COUNTY HIGHWAY
 SUNBRIGHT,

Learn Why Excess Flow Valves Are Important
www.navitasutility.com/efv

Navitas TN NG, LLC
 PO Box 183
 Eakly, OK 73033
 (866) 797-3342

TYPE OF SERVICE	METER READING		USED	CHARGES
	PRESENT	PREVIOUS		

Tariff 0 0 0 0.00
 Meter Factor 1.00000 Adjust Usage

Purchase Gas Adj 0.00
 Customer + Energy Efficiency Charge 0.00
 Tax 0.00
 Previous Balance 196816.43

000000000010000

Service from 01/01/2017 to 08/07/2017

ACCOUNT 600006677 11/07/2017

METER READ MONTH	DAY	TOTAL DUE UPON RECEIPT	LATE CHARGES AFTER DUE DATE	IF LATE PAY:

8 7 196816.43 8452.01 205268.4

Purchase Gas Adj. = 0.8684
 Visa/MC Accepted | SAVE A STAMP! SIGN UP FOR ACH TODAY!
 Small Gas??? Phone 866-579-3303

FIRST-CLASS MAIL
 U.S. POSTAGE
 PAID
 EAKLY
 PERMIT NO.

2

CUSTOMER
 Route Account Due Date
 NONE 600006677 12/01/2017

TOTAL AMOUNT IF LATE
 TO BE PAID PAY:
 196816.4 205268.4

MAIL THIS STUB WITH YOUR PAYMENT

B&W PIPELINE
 9534 MORGAN COUNTY HIGHWAY
 SUNBRIGHT,

Learn Why Excess Flow Valves Are Important
www.navitasutility.com/efv

Navitas TN NG, LLC
 PO Box 183
 Eakly, OK 73033
 (866) 797-3342

TYPE OF SERVICE	METER READING PRESENT	PREVIOUS	USED	CHARGES
-----------------	-----------------------	----------	------	---------

Tariff 0 0 0 0.00
 Meter Factor 1.00000 Adjust Usage

Purchase Gas Adj 0.00
 Customer - Energy Efficiency Charge 0.00
 Tax 0.00
 Previous Balance 266115.21

000000000010000

Service from 01/01/2017 to 08/07/2017

ACCOUNT 600006677 12/07/2017

METER READ MONTH	DAY	TOTAL DUE UPON RECEIPT	LATE CHARGES AFTER DUE DATE	IF LATE PAY:
------------------	-----	------------------------	-----------------------------	--------------

8 7 266115.21 12001.86 278117.1

Purchase Gas Adj = 0.8684
 Visa/MC Accepted | SAVE A STAMP! SIGN UP FOR ACH TODAY!
 Small Gas?? Phone 866-579-3303

FIRST-CLASS MAIL
 U.S. POSTAGE
 PAID

EAKLY
 PERMIT NO. 2

CUSTOMER
 Route Account Due Date
 NONE 600006677 12/31/2017

TOTAL AMOUNT TO BE PAID 266115.2
 IF LATE PAY: 278117.1

MAIL THIS STUB WITH YOUR PAYMENT

B&W PIPELINE
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 SUNBRIGHT.

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Navitas TN NG, LLC
 PO Box 183
 Eakly, OK 73033
 (866) 797-3342

TYPE OF SERVICE	METER READING		USED	CHARGES
	PRESENT	PREVIOUS		
Tariff	0	0	0	0.00
Meter Factor	1.00000 Adjust Usage			

Purchase Gas Adj 0.00
 Customer + Energy Efficiency Charge 0.00
 Tax 0.00
 Previous Balance 382761.49

000000000010000

Service from 01/01/2017 to 08/07/2017

ACCOUNT 600006677 01/07/2018

METER READ	TOTAL DUE		LATE CHARGES	IF LATE
	MONTH	DAY		
8	7	382761.49	17221.57	399983.1

Purchase Gas Adj. = 0.8684
 Visa/MC Accepted | SAVE A STAMP! SIGN UP FOR ACH TODAY!
 Small Gas??? Phone 866-578-3303

FIRST-CLASS MAIL
 U.S. POSTAGE
 PAID
 EAKLY
 PERMIT NO.
 2

CUSTOMER
 Route NONE Account 600006677 Due Date 01/31/2018
 TOTAL AMOUNT IF LATE
 TO BE PAID PAY:
 382761.5 399983.1
 MAIL THIS STUB WITH YOUR PAYMENT

B&W PIPELINE
 9534 MORGAN COUNTY HIGHWAY
 SUNBRIGHT,

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