



March 23, 2020

Robin L. Morrison
Chairman
Tennessee Public Utility Commission
4th Floor, Andrew Jackson State Office Bldg
502 Deaderick Street
Nashville, Tennessee 37243

RE: Navitas TN NG, LLC COVID-19 Response Initial Filing

Per the March 19, 2020 Request regarding utility emergency operational and response plans during the COVID-19 public health emergency, Navitas TN NG, LLC will adhere to the following procedures as they relate to Navitas customers and employees.

Customers

Navitas will continue to disconnect services due to issues **not related** to COVID-19. Shut-offs and disconnections not related to COVID-19 include: typical periodic shut-off/disconnection of habitual late payers, defined as any customer having three or more late payment penalties between February 28, 2019 and February 16, 2020; typical seasonal shut-off/disconnection of annual meter deposit users, defined as any customer failing in the spring of 2019 to pay the last bill of winter until the fall of 2019 as part of service re-establishment; shut-off/disconnection of non-using non; shut-off/disconnection of non-residential customers using gas for production of a product (thus continued production of a product will be evidence of no COVID-19 effect). Typical domestic type gas water heater usage shall not be evidence of continued production; and shut-off/disconnection of oil industry employees or oil industry businesses for non-payment. Cases that do not fall into one of the above categories will be determined on a case-by-case basis. **Navitas will not disconnect services for overdue payments related to COVID-19.**

Navitas follows the letter of the law, regulation, rules and tariff as it relates to late fees and cut offs. As a matter of course Navitas works with customers to formulate payment plans, in particular using level-pay to assist them through challenging circumstances. Navitas will continue to issue all normal late payment notices including the Cut-Off Notice and the 48-Hour Notice based on standard practices. Navitas will continue to implement all normal late payment



penalties. As first, the cost and risk of recoding the software is high, and second, there is a potential regulatory asset being established by the commissions in certain jurisdictions. Navitas will not pursue the collection of late payment penalties posted after the January usage billing thus after February 15, 2020 until further notification of the Commission.

Employees

In order to protect our employees, as of the week of March 23, 2020, Navitas is taking the following actions: One individual each from the Eakly and Ochelata customer service staff stay home with pay for a minimum of three days during the work week. Field personnel will be broken into teams or individuals and interactions between the various groups is to be minimized and adhere to appropriate social distancing. Corporate office personnel will be broken into pairings with half working from home at any one time.

Effective March 23, 2020 Navitas is temporarily granting an additional five days of paid sick leave and have requested that any employee showing any sign of illness remain home.

Navitas will provide weekly updates to the Commission in compliance with the Request issued March 19, 2020.

Sincerely,

Thomas Hartline

Navitas Utility Corporation