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February 23, 2024

Ms. Debbie-Anne Reese, Acting Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Millennium Pipeline Company, L.L.C.  
Docket No. RP24-\_\_\_\_-000  
Annual Retainage Adjustment Mechanism Compliance Filing

Dear Ms. Reese,

In accordance with Section 32 of the General Terms and Conditions (“GT&C”) of its FERC Gas Tariff (“Tariff”) and Section 4 of the Natural Gas Act, Millennium Pipeline Company, L.L.C. (“Millennium”) hereby submits for filing with the Federal Energy Regulatory Commission (“Commission”) the following revised tariff record: “Currently Effective Rates, Section 7. Retainage Rates, Version 23.0.0,” proposed to be effective April 1, 2024.

### **Statement of Nature, Reasons and Basis for Filing**

Millennium is submitting the instant filing pursuant to the procedures set forth in Sections 1.36 and 32 of the GT&C of its Tariff. GT&C Section 1.36 defines “Retainage” as “the quantity of gas, expressed as a percentage of receipt quantities, Shipper must provide Transporter (in addition to quantities Transporter will deliver to Shipper) for company-use, lost and unaccounted-for quantities, and to recover the cost of electricity to be used for electric gas heaters at Transporter’s compressor stations under any of Transporter’s Rate Schedules that refer to such term.” GT&C Section 32.2 states that Millennium must “adjust the Retainage Percentage, to take into account both prospective changes in Retainage requirements and unrecovered Retainage quantities from the preceding period as described at GT&C Section 32.4 . . . for transportation.” The adjustment to Retainage is effectuated through annual filings and through periodic filings made “at such other times as Transporter in its reasonable discretion determines necessary based upon operating or other conditions.”<sup>1</sup>

Millennium’s Retainage Percentage is comprised of two components: a percentage designed to reimburse Millennium for the fuel it uses to operate its system and the cost of electricity to be used for electric gas heaters at certain of Millennium’s compressor stations (“CU Percentage”) and a percentage that is used to reimburse Millennium for lost and unaccounted for gas experienced during operation (“LAUF Percentage”). To calculate the Retainage Percentage under Millennium’s Tariff, the CU Percentage and LAUF Percentage are added together.

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<sup>1</sup> Millennium Tariff, GT&C § 32.2.



Under Section 32.4(a) of Millennium’s Tariff, the CU Percentage and LAUF Percentage applied each year are based on estimates made for the upcoming year. However, the amount to be retained in a given year is also adjusted for any under-retainage or over-retainage in the prior calendar year pursuant to GT&C Section 32.4(b).

### *Eastern System Upgrade*

On November 28, 2017, the Commission issued a certificate order authorizing Millennium’s Eastern System Upgrade Project (“ESU Project” or “ESU”), allowing Millennium to provide 223,000 dekatherms per day of incremental firm transportation service from its existing compressor station in Corning, New York, to its interconnection with Algonquin Gas Transmission in Ramapo, New York.<sup>2</sup> The ESU Project included a new compressor station in Sullivan County, New York, a new 22,400 horsepower compressor unit at the existing Hancock Compressor Station in Delaware County, New York, and gas-fired gas heaters at both compressor stations. The Commission approved an incremental fuel retainage rate for ESU Project shippers.<sup>3</sup>

In compliance with the ESU Project certificate order, Millennium proposed an incremental fuel retainage percentage for the ESU Project in its RAM filings for February 2019 (RP19-704), February 2020 (RP20-566), February 2021 (RP21-524), February 2022 (RP22-583), and February 2023 (RP23-452). In each of these RAM Filings, Millennium computed the retainage percentages using the methodology explained in its ESU Project certificate application. No protests or comments were filed in response to these filings, and they were accepted by the Commission.<sup>4</sup>

### *Valley Lateral Project*

On November 9, 2016, the Commission issued a certificate for the Valley Lateral Project which consisted of 7.8 miles of 16-inch-diameter lateral pipeline and related facilities in Orange County, New York, in order to provide transportation service to the Valley Energy Center in the Town of Wawayanda, New York.<sup>5</sup> The Commission approved an initial fuel retention rate of 0.00 percent based on Millennium’s explanation that “(a) it will not use compression and will therefore not consume any incremental fuel in operating the Valley Lateral Project, and (b) prior to placing the lateral into service, Millennium has no basis for calculating lost and unaccounted-for (LAUF) quantities on the discrete lateral facilities.”<sup>6</sup> To address LAUF after the commencement of service on the Valley Lateral, the Commission directed Millennium “in its first Retainage Adjustment Mechanism filing after placing the Valley Lateral Project into service, to propose a method for assessing LAUF associated with service exclusively on the lateral.”<sup>7</sup> The Commission further required that such “LAUF costs be allocated to incremental service under Rate Schedules LFT and LIT.”<sup>8</sup>

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<sup>2</sup> *Millennium Pipeline Co., L.L.C.*, 161 FERC ¶ 61,229 (2017), *order on reh’g*, 164 FERC ¶ 61,039 (2018).

<sup>3</sup> *Id.*, 161 FERC at PP 30-32.

<sup>4</sup> Letter Order, Docket No. RP19-704-000 (Mar. 19, 2019); Letter Order, Docket No. RP20-566-000 (Mar. 17, 2020), Letter Order, Docket No. RP21-524-000 (Mar. 19, 2021), Letter Order, Docket No. RP22-583 (March 16, 2022), Letter Order, Docket No. RP23-452 (March 8, 2023).

<sup>5</sup> *Millennium Pipeline Co., L.L.C.*, 157 FERC ¶ 61,096 (2016).

<sup>6</sup> *Id.* at PP 36-37.

<sup>7</sup> *Id.* at P 38.

<sup>8</sup> *Id.*



In compliance with the requirements of the certificate order for the Valley Lateral Project, Millennium, in its 2019, 2020, 2021, 2022 and 2023 RAM filings, proposed a method for assessing LAUF associated with service exclusively on the Valley Lateral and allocated such LAUF to incremental service under Millennium Rate Schedules LFT and LIT, which apply exclusively to service on the Valley Lateral (“Valley Lateral Services”). As indicated above, no comments or protests were filed, and Millennium’s RAM filings were approved.

### *Company Use Percentage*

As the attached Schedule A indicates, commencing April 1, 2024, Millennium’s Non-ESU CU Percentage rate will be 0.669%. This percentage is derived by first estimating the percentage of receipts that will need to be retained for anticipated fuel used to provide the Non-ESU services, based on Millennium’s expected operations and throughput for this calendar year. The amount of gas estimated to be needed for fuel for Non-ESU services is then added to an amount of gas determined to be necessary to permit Millennium to recover its electric costs attributable to running electric gas heaters. All of these electric gas heaters were in existence at Millennium’s compressor stations before the ESU Project was built.<sup>9</sup> The amount of gas necessary to recover Millennium’s electric costs is determined by dividing the electric costs by the first of the month Spot Index Price, as defined in GT&C Section 1.40 of Millennium’s Tariff, averaged over the preceding calendar year.

Also, as indicated in the attached Schedule A, the ESU CU Percentage rate will be 0.948% commencing April 1, 2024. Millennium calculated the ESU CU Percentage rate using the same methodology as it did in last year’s RAM filing.

Schedule A, Work Paper 1, and ESU Workpaper 1 attached hereto, provide more detail on how the CU Percentages are calculated. No CU Percentage will be assessed to Valley Lateral volumes, as no electric gas heaters or compression facilities are on the Valley Lateral.

### *Lost and Unaccounted For Percentage*

Schedule A also shows Millennium’s estimate for the percentage of receipts that it will need to retain to reimburse it for the amount of gas that will be lost and unaccounted for based on its expected operations and throughput for this calendar year. In line with the 2023 filing, Millennium continues to experience “negative LAUF” or, in other words, measurement gains. As indicated on Schedule A, Millennium forecasts that these gains will continue through 2024. Accordingly, Millennium is proposing a LAUF Percentage for 2024 at -0.253%. Work Paper 1 in this transmittal letter provides more detail on how this percentage was calculated. As reflected in Work Paper 1, the LAUF percentage is the same for both Non-ESU and ESU Project customers.

To calculate the LAUF associated with Valley Lateral Services, Millennium uses the ratio of the forecasted throughput on the Valley Lateral (Valley Lateral Workpaper 1) to total system

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<sup>9</sup> As part of the Minisink Compressor Project and the Hancock Compressor Project, Millennium added electric gas heaters. See Docket Nos. CP11-515 and CP13-14. As part of the ESU Project, Millennium added gas-fired gas heaters and the fuel for these heaters is included in the calculation of the ESU CU Percentage.



throughput (Workpaper 1 + Workpaper 1 ESU) to obtain the Valley Lateral Services' percentage of total system throughput. Millennium then multiplies the Valley Lateral Services' percentage of total system throughput by the LAUF Percentage that applies to Millennium's main system. This calculation provides the LAUF Percentage for service exclusively on the Valley Lateral. This calculation results in Valley Lateral Services LAUF Percentage of -0.012%, as shown on Schedule A.

#### *Unrecovered Retainage Percentage*

GT&C Section 32.4(b) requires the calculation of the Unrecovered Retainage Percentage, to adjust for over- or under-recoveries of CU and LAUF gas from the preceding annual period. Work Paper 2, attached to this transmittal letter, shows the quantity of gas Millennium retained from its shippers through the calendar year ending December 31, 2023 and how much CU and LAUF gas was actually experienced for the same period. As shown on Schedule A, Millennium needs to return 24,212 dekatherms of over-collected CU gas to Non-ESU shippers but collect 21,774 dekatherms of under-collected CU gas from ESU shippers. Millennium must also collect 16,252 dekatherms of Unrecovered Electric Gas Heaters gas from Non-ESU shippers (The gas heaters added as part of the ESU Project were gas fired and this is accounted for in the calculation of the ESU CU percentage). This results in CU Unrecovered Retainage Percentage of -0.001% for Non-ESU shippers and 0.034% for ESU shippers. Additionally, Millennium needs to return 102,358 dekatherms of under-collected LAUF gas to its Non-ESU shippers, resulting in an Unrecovered LAUF Percentage for Non-ESU shippers of -0.019%. Millennium needs to return 11,247 dekatherms to its ESU Project Customers, resulting in an Unrecovered LAUF Percentage for ESU shippers of -0.018%. Millennium also under-recovered 11 dekatherms of LAUF from Valley Lateral Services and these services will be assessed an Unrecovered LAUF Percentage of 0.000%.

#### *Retainage Percentages Effective April 1, 2024*

As indicated in Schedule A, by adding the Unrecovered Retainage Percentages to the CU Percentage and the LAUF Percentage, Millennium has calculated the Non-ESU Retainage Percentage under its Tariff to be 0.396%. Using the same formula, Millennium calculates the ESU Retainage Percentage under its Tariff to be 0.711% and the Retainage Percentage for Valley Lateral Services to be -0.012%. These new Retainage Percentages are proposed to be effective April 1, 2024, and are reflected in the revised tariff record filed with this transmittal letter.

#### **Proposed Effective Date**

Millennium requests an effective date for the revised tariff record of April 1, 2024. Millennium also requests that for the convenience of its customers and their supply purchase plans for April, 2024, that the Commission approve this filing no later than March 22, 2024, which is the day before bid week begins.



## **Requested Waivers**

To the extent the Commission deems necessary, Millennium requests any waivers of the Commission's regulations that may be required to permit the enclosed revised Tariff record to become effective on April 1, 2024.

## **Compliance with Regulations**

In compliance with Section 154.4(c) of the regulations of the Commission, 18 C.F.R. § 154.4(c), all contents of this filing are being submitted in conformance with the Secretary of the Commission's instructions.

In compliance with Section 154.201(a) of the Commission's regulations, 18 C.F.R. § 154.201(a), a marked version of the proposed tariff section with changes showing additions and deletions is attached.

## **Implementation**

Pursuant to Section 154.7(a)(9) of the Commission's regulations, Millennium moves to place the revised tariff record into effect at the expiration of any suspension period set by the Commission, provided that the tariff changes are approved as filed and without condition. In the event that the tariff section is not approved as filed and without condition, Millennium reserves the right to file a later motion to place such tariff record into effect.

## **Materials Enclosed**

Pursuant to Section 154.7 of the Commission's regulations, the following materials are submitted herewith:

An eTariff XML filing package, filed as a zip (compressed) file, containing:

- The transmittal letter;
- A clean version of the tariff records;
- A marked version of the tariff records; and
- Workpapers supporting the filing.

## **Communications**

Pursuant to Rule 203 of the Commission's Rules of Practice and Procedure, Millennium requests that all Commission orders and correspondence as well as pleadings and correspondence from other parties concerning this filing be served on the following:

Georgia B. Carter  
Vice President and General Counsel  
Millennium Pipeline Company, L.L.C.  
1 Blue Hill Plz 7<sup>th</sup> Floor  
Pearl River, NY 10965-3104  
Tel: (845) 620-1300



Fax: (845) 620-1320  
carter@millenniumpipeline.com

In accordance with Section 154.2(d) of the Commission's Regulations, a copy of this filing is available for public inspection during regular business hours at Millennium's office located in Pearl River, New York. In addition, copies of this filing are being served on jurisdictional customers and interested state regulatory agencies. Millennium has posted a copy of its filing on its website accessible via <http://ebb.tceconnects.com/infopost/> under "Millennium Pipeline (MPC), Tariff, Pending Tariff Filings."

Pursuant to Section 385.2011(c)(5) of the Commission's Regulations, the undersigned has read this filing and knows its contents, and the contents are true as stated, to the best of her knowledge and belief. The undersigned possesses full power and authority to sign such filing.

Respectfully submitted,  
MILLENNIUM PIPELINE COMPANY, L.L.C.

By: /s/ Georgia B. Carter  
Georgia B. Carter  
Vice President – General Counsel  
Millennium Pipeline Company, L.L.C.

Attachments



# **CLEAN TARIFF SECTION**

#### RETAINAGE PERCENTAGE

Retainage	0.396%
Valley Lateral Retainage	-0.012%
Eastern System Upgrade Retainage 1/	0.711%

1/ The Eastern System Upgrade Project Retainage Percentage is an incremental rate applicable to all service on the Eastern System Upgrade Project approved by FERC order issued November 28, 2017 in Docket No. CP16-486-000. The Eastern System Upgrade Project Retainage Percentage will be adjusted periodically pursuant to Section 32 of the General Terms & Condition hereto.



# **MARKED TARIFF SECTION**

#### RETAINAGE PERCENTAGE

	Retainage	<del>0.434</del> <u>0.396</u> %
	Valley Lateral Retainage	<del>-0.005</del> <u>-0.012</u> %
	Eastern System Upgrade Retainage 1/	<del>0.687</del> <u>0.711</u> %

1/ The Eastern System Upgrade Project Retainage Percentage is an incremental rate applicable to all service on the Eastern System Upgrade Project approved by FERC order issued November 28, 2017 in Docket No. CP16-486-000. The Eastern System Upgrade Project Retainage Percentage will be adjusted periodically pursuant to Section 32 of the General Terms & Condition hereto.

# **WORKPAPERS**

Millennium Pipeline Company, LLC  
Retainage Adjustment Mechanism  
Effective April 1, 2024  
Schedule A

Line No.	Description	Non ESU	ESU	Valley Lateral
1	<b><u>Fuel or Company Use Gas ("CUG")</u></b>			
2	Projected Deliveries ("DTHS")	549,000,000	64,000,000	31,000,000
3	Projected Company Use Gas ("DTHS")	3,629,000	607,000	0
4	Projected Company Use, Electric Gas Heaters ("DTHS")	<u>46,000</u>	<u>0</u>	<u>0</u>
5	Company Use Gas Percentage	Non ESU <u>0.669%</u>	ESU <u>0.948%</u>	Valley Lat <u>0.000%</u>
6	<b><u>Lost And Unaccounted For Gas ("LAUF")</u></b>			
7	Projected Deliveries ("DTHS")	549,000,000	64,000,000	31,000,000
8	Projected Lost and Unaccounted for ("DTHS")	<u>-1,386,382</u>	<u>-161,618</u>	<u>-3,720</u>
9	Lost and Unaccounted For Percentage	Non ESU <u>-0.253%</u>	ESU <u>-0.253%</u>	Valley Lat <u>-0.012%</u>
10	<b><u>Unrecovered CUG and LAUF Retainage Percentage</u></b>			
11	<b><u>CUG Percentage</u></b>			
12	Unrecovered CUG ("DTHS")	-24,212	21,774	0
13	Unrecovered Electric Gas Heaters ("DTHS")	16,252	0	0
14	Projected Deliveries ("DTHS")	<u>549,000,000</u>	<u>64,000,000</u>	<u>31,000,000</u>
15	Unrecovered CUG Percentage	Non ESU <u>-0.001%</u>	ESU <u>0.034%</u>	Valley Lat <u>0.000%</u>
16	<b><u>LAUF Percentage</u></b>			
17	Unrecovered LAUF ("DTHS")	-102,358	-11,247	11
18	Projected Deliveries ("DTHS")	<u>549,000,000</u>	<u>64,000,000</u>	<u>31,000,000</u>
19	Unrecovered LAUF Percentage	Non ESU <u>-0.019%</u>	ESU <u>-0.018%</u>	Valley Lat <u>0.000%</u>
20	<b><u>Retainage Percentage</u></b>			
21	CUG Percentage	0.669%	0.948%	0.000%
22	Unrecovered CUG Percentage	-0.001%	0.034%	0.000%
23	LAUF Percentage	-0.253%	-0.253%	-0.012%
24	Unrecovered LAUF Percentage	<u>-0.019%</u>	<u>-0.018%</u>	<u>0.000%</u>
25	<b><u>Retainage Percentage</u></b>	Non ESU <u>0.396%</u>	ESU <u>0.711%</u>	Valley Lat <u>-0.012%</u>

Millennium Pipeline Company, LLC  
Retainage Adjustment Mechanism  
Non-ESU Workpaper 1

Year	Flow Mo	Tariff Deliveries	CUG	Electric Tracker	Total	CUG	LAUF
Priors			499	0	499		(304)
2023	1	45,670,418	375,475	1,697	377,172		(91,297)
2023	2	41,767,810	360,640	1,952	362,592		(88,196)
2023	3	46,110,088	376,197	2,945	379,142		(122,476)
2023	4	44,345,794	272,966	3,857	276,823		(89,530)
2023	5	44,079,691	230,051	3,238	233,289		(115,441)
2023	6	43,712,364	204,519	4,613	209,132		(127,736)
2023	7	50,823,200	297,630	5,634	303,264		(126,814)
2023	8	47,118,409	264,583	6,662	271,245		(124,140)
2023	9	47,796,147	275,420	7,299	282,719		(131,715)
2023	10	46,848,057	249,884	4,896	254,780		(131,282)
2023	11	44,405,623	355,640	2,794	358,434		(131,021)
2023	12	46,474,582	365,761	0	365,761		(107,331)
2023	Total	<u>549,152,183</u>	<u>3,629,265</u>	<u>45,587</u>	<u>3,674,852</u>		<u>(1,387,283)</u>
2024 Forecasted Operational Changes		<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>		<u>0</u>
Total		<u>549,152,183</u>	<u>3,629,265</u>	<u>45,587</u>	<u>3,674,852</u>		<u>(1,387,283)</u>
Rounded Total		549,000,000	3,629,000	46,000	3,675,000		(1,387,000)

Millennium Pipeline Company, LLC  
Retainage Adjustment Mechanism  
ESU Workpaper 1

Year	Flow Mo	Tariff Deliveries	CUG	Electric Tracker	Total	CUG	LAUF
Priors			81	0	81	(36)	
2023	1	6,503,377	73,569	0	73,569	(13,001)	
2023	2	5,677,358	67,451	0	67,451	(11,988)	
2023	3	6,178,328	69,359	0	69,359	(16,411)	
2023	4	4,996,027	42,450	0	42,450	(10,087)	
2023	5	4,553,246	32,802	0	32,802	(11,924)	
2023	6	3,969,008	25,634	0	25,634	(11,598)	
2023	7	4,470,964	36,142	0	36,142	(11,156)	
2023	8	4,745,011	36,780	0	36,780	(12,501)	
2023	9	4,711,765	37,479	0	37,479	(12,985)	
2023	10	5,109,532	37,621	0	37,621	(14,318)	
2023	11	6,402,974	70,787	0	70,787	(18,892)	
2023	12	7,031,279	76,387	0	76,387	(16,238)	
2023	Total	<u>64,348,869</u>	<u>606,542</u>	0	606,542	(161,135)	
2024 Forcasted Operational Changes		<u>0</u>	<u>0</u>		0	0	
Total		<u>64,348,869</u>	<u>606,542</u>	0	606,542	(161,135)	
Rounded Total		64,000,000	607,000	0	607,000	(161,000)	

Millennium Pipeline Company, LLC  
Retainage Adjustment Mechanism  
Valley Lateral Workpaper 1

Year	Flow Mo	Tariff Deliveries	CUG	Electric Tracker	Total CUG	LAUF
Priors					0	(1)
2023	1	2,651,082	0	0	0	(222)
2023	2	2,911,332	0	0	0	(257)
2023	3	2,565,911	0	0	0	(285)
2023	4	1,587,270	0	0	0	(168)
2023	5	1,480,899	0	0	0	(203)
2023	6	3,040,498	0	0	0	(466)
2023	7	3,408,167	0	0	0	(446)
2023	8	3,310,902	0	0	0	(457)
2023	9	3,117,507	0	0	0	(450)
2023	10	243,209	0	0	0	(36)
2023	11	3,216,569	0	0	0	(497)
2023	12	3,392,345	0	0	0	(411)
2023	Total	<u>30,925,691</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>(3,899)</u>
2024 Forcasted Operational Changes		<u>0</u>	<u>0</u>		<u>0</u>	<u>0</u>
Total		<u>30,925,691</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>(3,899)</u>
Rounded Total		31,000,000	0	0	0	(4,000)

Millennium Pipeline Company, LLC  
Retainage Adjustment Mechanism  
Non-ESU Worksheet 2

Year	Flow Mo	ACTUAL				RETAINAGE				UNDER/(OVER) RECOVERED			
		CUG	Electric Tracker	LAUF	Total	CUG	Electric Tracker	LAUF	Total	CUG	Electric Tracker	LAUF	Total
2022 Total		27,776,025	332,486	706,190	28,814,701	27,899,307	341,580	677,420	28,918,307	(123,282)	(9,094)	28,770	(103,606)
2023 PPA		499	0	(304)	195	26	0	(11)	15	473	0	(293)	180
Inception to date		27,776,524	332,486	705,886	28,814,896	27,899,333	341,580	677,409	28,918,322	(122,809)	(9,094)	28,477	(103,426)
2023	1	375,475	1,697	(91,297)	285,875	276,570	4,706	(111,955)	169,321	98,905	(3,009)	20,658	116,554
2023	2	360,640	1,952	(88,196)	274,396	252,717	4,301	(102,300)	154,718	107,923	(2,349)	14,104	119,678
2023	3	376,197	2,945	(122,476)	256,666	278,953	4,747	(112,920)	170,780	97,244	(1,802)	(9,556)	85,886
2023	4	272,966	3,857	(89,530)	187,293	292,467	825	(99,844)	193,448	(19,501)	3,032	10,314	(6,155)
2023	5	230,051	3,238	(115,441)	117,848	290,311	819	(99,108)	192,022	(60,260)	2,419	(16,333)	(74,174)
2023	6	204,519	4,613	(127,736)	81,396	288,083	814	(98,348)	190,549	(83,564)	3,799	(29,388)	(109,153)
2023	7	297,630	5,634	(126,814)	176,450	335,272	946	(114,457)	221,761	(37,642)	4,688	(12,357)	(45,311)
2023	8	264,583	6,662	(124,140)	147,105	311,108	878	(106,208)	205,778	(46,525)	5,784	(17,932)	(58,673)
2023	9	275,420	7,299	(131,715)	151,004	315,469	891	(107,697)	208,663	(40,049)	6,408	(24,018)	(57,659)
2023	10	249,884	4,896	(131,282)	123,498	309,004	873	(105,490)	204,387	(59,120)	4,023	(25,792)	(80,889)
2023	11	355,640	2,794	(131,021)	227,413	293,069	828	(100,050)	193,847	62,571	1,966	(30,971)	33,566
2023	12	365,761	0	(107,331)	258,430	306,668	866	(104,692)	202,842	59,093	(866)	(2,639)	55,588
2023 Total		3,628,766	45,587	(1,386,979)	2,287,374	3,549,691	21,494	(1,263,069)	2,308,116	79,075	24,093	(123,910)	(20,742)
2024 reallocation adjustment		0	0	0	0	(19,522)	(1,253)	6,925	(13,850)	19,522	1,253	(6,925)	13,850
Inception to date		31,405,290	378,073	(681,093)	31,102,270	31,429,502	361,821	(578,735)	31,212,588	(24,212)	16,252	(102,358)	(110,318)



Millennium Pipeline Company, LLC  
Retainage Adjustment Mechanism  
ESU Workpaper 2

Year	Flow Mo	ACTUAL				RETAINAGE				UNDER/(OVER) RECOVERED			
		CUG	Electric Tracker	LAUF	Total	CUG	Electric Tracker	LAUF	Total	CUG	Electric Tracker	LAUF	Total
2022 Total		2,031,818	0	(255,805)	1,776,013	2,044,816	0	(255,687)	1,789,129	(12,998)	0	(118)	(13,116)
2023 PPA		81	0	(36)	45	0	0	0	0	81	0	(36)	45
Inception to date		2,031,899	0	(255,841)	1,776,058	2,044,816	0	(255,687)	1,789,129	(12,917)	0	(154)	(13,071)
2023	1	73,569	0	(13,001)	60,568	55,085	0	(16,571)	38,514	18,484	0	3,570	22,054
2023	2	67,451	0	(11,988)	55,463	48,117	0	(14,475)	33,642	19,334	0	2,487	21,821
2023	3	69,359	0	(16,411)	52,948	52,480	0	(15,788)	36,692	16,879	0	(623)	16,256
2023	4	42,450	0	(10,087)	32,363	45,938	0	(11,371)	34,567	(3,488)	0	1,284	(2,204)
2023	5	32,802	0	(11,924)	20,878	41,866	0	(10,363)	31,503	(9,064)	0	(1,561)	(10,625)
2023	6	25,634	0	(11,598)	14,036	36,529	0	(9,042)	27,487	(10,895)	0	(2,556)	(13,451)
2023	7	36,142	0	(11,156)	24,986	40,980	0	(10,144)	30,836	(4,838)	0	(1,012)	(5,850)
2023	8	36,780	0	(12,501)	24,279	43,534	0	(10,776)	32,758	(6,754)	0	(1,725)	(8,479)
2023	9	37,479	0	(12,985)	24,494	43,323	0	(10,724)	32,599	(5,844)	0	(2,261)	(8,105)
2023	10	37,621	0	(14,318)	23,303	46,963	0	(11,625)	35,338	(9,342)	0	(2,693)	(12,035)
2023	11	70,787	0	(18,892)	51,895	55,263	0	(13,680)	41,583	15,524	0	(5,212)	10,312
2023	12	76,387	0	(16,238)	60,149	64,615	0	(15,995)	48,620	11,772	0	(243)	11,529
2023 Total		606,461	0	(161,099)	445,362	574,693	0	(150,554)	424,139	31,768	0	(10,545)	21,223
2024 realocation adjustment		0	0	0	0	(2,923)		548	(2,375)	2,923	0	(548)	2,375
Inception to date		2,638,360	0	(416,940)	2,221,420	2,616,586	0	(405,693)	2,210,893	21,774	0	(11,247)	10,527

Millennium Pipeline Company, LLC  
Retainage Adjustment Mechanism  
Valley Lateral Workpaper 2

Year	Flow Mo	ACTUAL				RETAINAGE				UNDER/(OVER) RECOVERED			
		Electric				Electric				Electric			
		CUG	Tracker	LAUF	Total	CUG	Tracker	LAUF	Total	CUG	Tracker	LAUF	Total
2022 Total		0	0	(4,157)	(4,157)	0	0	(6,104)	(6,104)	0	0	1,947	1,947
2023 PPA		0	0	(1)	(1)	0	0	0	0	0	0	(1)	(1)
Inception to date		0	0	(4,158)	(4,158)	0	0	(6,104)	(6,104)	0	0	1,946	1,946
2023	1	0	0	(222)	(222)	0	0	(417)	(417)	0	0	195	195
2023	2	0	0	(257)	(257)	0	0	(492)	(492)	0	0	235	235
2023	3	0	0	(285)	(285)	0	0	(425)	(425)	0	0	140	140
2023	4	0	0	(168)	(168)	0	0	(74)	(74)	0	0	(94)	(94)
2023	5	0	0	(203)	(203)	0	0	(65)	(65)	0	0	(138)	(138)
2023	6	0	0	(466)	(466)	0	0	(144)	(144)	0	0	(322)	(322)
2023	7	0	0	(446)	(446)	0	0	(165)	(165)	0	0	(281)	(281)
2023	8	0	0	(457)	(457)	0	0	(155)	(155)	0	0	(302)	(302)
2023	9	0	0	(450)	(450)	0	0	(156)	(156)	0	0	(294)	(294)
2023	10	0	0	(36)	(36)	0	0	(10)	(10)	0	0	(26)	(26)
2023	11	0	0	(497)	(497)	0	0	(156)	(156)	0	0	(341)	(341)
2023	12	0	0	(411)	(411)	0	0	(159)	(159)	0	0	(252)	(252)
2023 Total		0	0	(3,898)	(3,898)	0	0	(2,418)	(2,418)	0	0	(1,480)	(1,480)
2024 reallocation adjustment								455	455	0	0	(455)	(455)
Inception to date		0	0	(8,056)	(8,056)	0	0	(8,067)	(8,067)	0	0	11	11