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February 22, 2023

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Millennium Pipeline Company, L.L.C.
Docket No. RP23-____-000
Annual Retainage Adjustment Mechanism Compliance Filing

Dear Ms. Bose,

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 22.0.0,” proposed to be effective April 1, 2023.

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.”¹

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.

¹ 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.² 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.³

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) and February 2022 (RP22-583). 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.⁴

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.⁵ 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.”⁶ 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.”⁷ The Commission further required that such “LAUF costs be allocated to incremental service under Rate Schedules LFT and LIT.”⁸

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

³ *Id.*, 161 FERC at PP 30-32.

⁴ 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 (Mar. 16, 2022).

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

⁶ *Id.* at PP 36-37.

⁷ *Id.* at P 38.

⁸ *Id.*



In compliance with the requirements of the certificate order for the Valley Lateral Project, Millennium, in its 2019, 2020, 2021, and 2022 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, 2023, Millennium’s Non-ESU CU Percentage rate will be 0.673%. 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.⁹ 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 0.929% commencing April 1, 2023. Millennium calculated the ESU CU Percentage rate using the same methodology as it did in last year’s RAM filing.

Schedule A, Workpaper 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 2022 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 2023. Accordingly, Millennium is proposing a LAUF Percentage for 2023 at -0.229%. Workpaper 1 provides more detail on how this percentage was calculated. As reflected in Workpaper 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 throughput (Workpaper 1 + Workpaper 1 ESU) to obtain the Valley Lateral Services’ percentage

⁹ 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.



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. Workpaper 2, shows the quantity of gas Millennium retained from its shippers through the calendar year ending December 31, 2022 and how much CU and LAUF gas was actually experienced for the same period. As shown on Schedule A, Millennium needs to return 79,220 dekatherms of over-collected CU gas to Non-ESU shippers and return 8,324 dekatherms of over-collected CU gas to ESU shippers. Millennium must also return 5,088 dekatherms of Unrecovered Electric Gas Heaters gas to 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 -0.015% for Non-ESU shippers and -0.016% for ESU shippers. Additionally, Millennium needs to recover 28,770 dekatherms of under-collected LAUF gas from its Non-ESU shippers, resulting in an Unrecovered LAUF Percentage for Non-ESU shippers of 0.005%. Millennium needs to recover 1,477 dekatherms from its ESU Project Customers, resulting in an Unrecovered LAUF Percentage for ESU shippers of 0.003%. Millennium also under-recovered 2,447 dekatherms of LAUF from Valley Lateral Services and these services will be assessed an Unrecovered LAUF Percentage of 0.007%.

Retainage Percentages Effective April 1, 2022

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 0.434%. Using the same formula, Millennium calculates the ESU Retainage Percentage under its Tariff to be 0.687% and the Retainage Percentage for Valley Lateral Services to be -0.005%. These new Retainage Percentages are proposed to be effective April 1, 2022, 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, 2023. Millennium also requests that for the convenience of its customers and their supply purchase plans for April 2023, that the Commission approve this filing no later than March 24, 2023, 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, 2023.



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 7th 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	0.434%
Valley Lateral Retainage	-0.005%
Eastern System Upgrade Retainage 1/	0.687%

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	0.366 <u>0.434</u> %
	Valley Lateral Retainage	-0.016 <u>-0.005</u> %
	Eastern System Upgrade Retainage 1/	0.588 <u>0.687</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, 2023
Schedule A

Line No.	Description	Non ESU	ESU	Valley Lateral
1	Fuel or Company Use Gas ("CUG")			
2	Projected Deliveries ("DTHS")	544,000,000	52,000,000	34,000,000
3	Projected Company Use Gas ("DTHS")	3,646,000	483,000	0
4	Projected Company Use, Electric Gas Heaters ("DTHS")	15,000	0	0
5	Company Use Gas Percentage	Non ESU <u>0.673%</u>	ESU <u>0.929%</u>	Valley Lat <u>0.000%</u>
6	Lost And Unaccounted For Gas ("LAUF")			
7	Projected Deliveries ("DTHS")	544,000,000	52,000,000	34,000,000
8	Projected Lost and Unaccounted for ("DTHS")	-1,245,906	-119,094	-4,080
9	Lost and Unaccounted For Percentage	Non ESU <u>-0.229%</u>	ESU <u>-0.229%</u>	Valley Lat <u>-0.012%</u>
10	Unrecovered CUG and LAUF Retainage Percentage			
11	CUG Percentage			
12	Unrecovered CUG ("DTHS")	-79,220	-8,324	0
13	Unrecovered Electric Gas Heaters ("DTHS")	-5,088	0	0
14	Projected Deliveries ("DTHS")	544,000,000	52,000,000	34,000,000
15	Unrecovered CUG Percentage	Non ESU <u>-0.015%</u>	ESU <u>-0.016%</u>	Valley Lat <u>0.000%</u>
16	LAUF Percentage			
17	Unrecovered LAUF ("DTHS")	28,770	1,477	2,447
18	Projected Deliveries ("DTHS")	544,000,000	52,000,000	34,000,000
19	Unrecovered LAUF Percentage	Non ESU <u>0.005%</u>	ESU <u>0.003%</u>	Valley Lat <u>0.007%</u>
20	Retainage Percentage			
21	CUG Percentage	0.673%	0.929%	0.000%
22	Unrecovered CUG Percentage	-0.015%	-0.016%	0.000%
23	LAUF Percentage	-0.229%	-0.229%	-0.012%
24	Unrecovered LAUF Percentage	<u>0.005%</u>	<u>0.003%</u>	<u>0.007%</u>
25	Retainage Percentage	Non ESU <u>0.434%</u>	ESU <u>0.687%</u>	Valley Lat <u>-0.005%</u>

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

Year	Flow Mo	Tariff Deliveries	CUG	Electric Tracker	Total CUG	LAUF
Priors			(12)	1,617		(6,885)
2022	1	53,662,141	425,217	1,328		(98,724)
2022	2	45,133,166	374,433	1,567		(116,022)
2022	3	46,749,211	353,548	553		(104,295)
2022	4	42,900,940	257,815	1,687		(114,752)
2022	5	44,218,074	227,901	858		(132,368)
2022	6	43,680,074	243,218	1,442		(139,189)
2022	7	46,309,834	306,256	1,248		(81,919)
2022	8	45,123,472	332,580	955		(82,243)
2022	9	41,777,898	238,649	878		(99,537)
2022	10	43,849,209	226,962	691		(110,413)
2022	11	43,505,220	294,799	663		(84,779)
2022	12	47,016,745	364,211	1,472		(77,742)
2022	Total	<u>543,925,984</u>	<u>3,645,577</u>	<u>14,959</u>		<u>(1,248,868)</u>
2023 Forecasted Operational Changes		<u>-</u>	<u>-</u>			<u>0</u>
Total		<u>543,925,984</u>	<u>3,645,577</u>	<u>14,959</u>		<u>-1,248,868</u>
Rounded Total		544,000,000	3,646,000	15,000	3,661,000	-1,249,000

Millennium Pipeline Company, LLC
Retainage Adjustment Mechanism
ESU Workpaper 1

Year	Flow Mo	Tariff Deliveries	CUG	Electric Tracker	Total CUG	LAUF
Priors			(1)	0		(657)
2022	1	6,809,774	68,725	0		(12,528)
2022	2	5,796,570	61,247	0		(14,901)
2022	3	5,209,233	50,175	0		(11,622)
2022	4	3,811,291	31,516	0		(10,194)
2022	5	3,299,239	23,398	0		(9,876)
2022	6	3,060,945	23,452	0		(9,754)
2022	7	3,880,860	35,314	0		(6,865)
2022	8	3,810,070	38,640	0		(6,944)
2022	9	2,721,813	21,394	0		(6,485)
2022	10	2,530,170	18,020	0		(6,371)
2022	11	4,648,067	43,338	0		(9,058)
2022	12	6,316,948	67,331	0		(10,445)
2022	Total	<u>51,894,980</u>	<u>482,549</u>	<u>0</u>		<u>(115,700)</u>
2023 Forecasted Operational Changes		<u>0</u>	<u>0</u>			<u>0</u>
Total		<u>51,894,980</u>	<u>482,549</u>	<u>0</u>		<u>-115,700</u>
Rounded Total		52,000,000	483,000	0	483,000	-116,000

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

Year	Flow Mo	Tariff Deliveries	CUG	Electric Tracker	Total CUG	LAUF
Priors						(11)
2022	1	2,939,515	0	0		(135)
2022	2	3,141,304	0	0		(202)
2022	3	3,336,055	0	0		(186)
2022	4	3,168,972	0	0		(35)
2022	5	1,148,367	0	0		(14)
2022	6	3,020,899	0	0		(40)
2022	7	3,156,272	0	0		(23)
2022	8	3,209,878	0	0		(24)
2022	9	2,347,910	0	0		(23)
2022	10	3,013,069	0	0		(32)
2022	11	2,643,625	0	0		(22)
2022	12	2,746,046	0	0		(19)
2022	Total	<u>33,871,912</u>	<u>0</u>	<u>0</u>		<u>(766)</u>
2023 Forecasted Operational Changes		<u>-</u>	<u>-</u>			<u>0</u>
Total		<u>33,871,912</u>	<u>0</u>	<u>0</u>		<u>-766</u>
Rounded Total		34,000,000	0	0	0	-1,000

Millennium Pipeline Company, LLC
Retainage Adjustment Mechanism
Non-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
2021 Total		24,130,448	317,527	1,955,058	26,403,033	24,475,798	286,789	2,326,818	27,089,405	-345,350	30,738	-371,760	-686,372
2022 PPA		-12	1,617	-6,885	-5,280	8	0	-2	6	-20	1,617	-6,883	-5,286
Inception to date		24,130,436	319,144	1,948,173	26,397,753	24,475,806	286,789	2,326,816	27,089,411	-345,370	32,355	-378,643	-691,658
2022	1	425,217	1,328	-98,724	327,821	380,585	5,074	-251,490	134,169	44,632	-3,746	152,766	193,652
2022	2	374,433	1,567	-116,022	259,978	319,605	4,261	-211,194	112,672	54,828	-2,694	95,172	147,306
2022	3	353,548	553	-104,295	249,806	329,051	4,387	-217,436	116,002	24,497	-3,834	113,141	133,804
2022	4	257,815	1,687	-114,752	144,750	257,388	4,415	-104,199	157,604	427	-2,728	-10,553	-12,854
2022	5	227,901	858	-132,368	96,391	265,399	4,552	-107,442	162,509	-37,498	-3,694	-24,926	-66,118
2022	6	243,218	1,442	-139,189	105,471	262,308	4,499	-106,191	160,616	-19,090	-3,057	-32,998	-55,145
2022	7	306,256	1,248	-81,919	225,585	278,022	4,769	-112,553	170,238	28,234	-3,521	30,634	55,347
2022	8	332,580	955	-82,243	251,292	270,724	4,644	-109,598	165,770	61,856	-3,689	27,355	85,522
2022	9	238,649	878	-99,537	139,990	250,729	4,301	-101,503	153,527	-12,080	-3,423	1,966	-13,537
2022	10	226,962	691	-110,413	117,240	262,980	4,511	-106,463	161,028	-36,018	-3,820	-3,950	-43,788
2022	11	294,799	663	-84,779	210,683	262,355	4,500	-106,210	160,645	32,444	-3,837	21,431	50,038
2022	12	364,211	1,472	-77,742	287,941	284,355	4,878	-115,117	174,116	79,856	-3,406	37,375	113,825
2022 Total		3,645,589	13,342	-1,241,983	2,416,948	3,423,501	54,791	-1,649,396	1,828,896	222,088	-41,449	407,413	588,052
2023 reallocation adjustment		0	0	0	0	-44,062	-4,006	0	-48,068	44,062	4,006	0	48,068
Inception to date		27,776,025	332,486	706,190	28,814,701	27,899,307	341,580	677,420	28,918,307	-79,220	-5,088	28,770	-55,538

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
		2021 Total	1,549,269	0	-140,105	1,409,164	1,600,066	0	-90,503	1,509,563	-50,797	0	-49,602
2022 PPA	-1	0	-657	-658	0	0	0	0	-1	0	-657	-658	
Inception to date		1,549,268	0	-140,762	1,408,506	1,600,066	0	-90,503	1,509,563	-50,798	0	-50,259	-101,057
2022	1	68,725	0	-12,528	56,197	60,026	0	-30,047	29,979	8,699	0	17,519	26,218
2022	2	61,247	0	-14,901	46,346	51,210	0	-25,634	25,576	10,037	0	10,733	20,770
2022	3	50,175	0	-11,622	38,553	45,918	0	-22,985	22,933	4,257	0	11,363	15,620
2022	4	31,516	0	-10,194	21,322	32,200	0	-9,687	22,513	-684	0	-507	-1,191
2022	5	23,398	0	-9,876	13,522	27,800	0	-8,363	19,437	-4,402	0	-1,513	-5,915
2022	6	23,452	0	-9,754	13,698	25,755	0	-7,748	18,007	-2,303	0	-2,006	-4,309
2022	7	35,314	0	-6,865	28,449	32,788	0	-9,864	22,924	2,526	0	2,999	5,525
2022	8	38,640	0	-6,944	31,696	32,147	0	-9,671	22,476	6,493	0	2,727	9,220
2022	9	21,394	0	-6,485	14,909	22,934	0	-6,899	16,035	-1,540	0	414	-1,126
2022	10	18,020	0	-6,371	11,649	21,242	0	-6,390	14,852	-3,222	0	19	-3,203
2022	11	43,338	0	-9,058	34,280	39,324	0	-11,830	27,494	4,014	0	2,772	6,786
2022	12	67,331	0	-10,445	56,886	53,406	0	-16,066	37,340	13,925	0	5,621	19,546
2022 Total		482,550	0	-115,043	367,507	444,750	0	-165,184	279,566	37,800	0	50,141	87,941
2023 reallocation adjustment		0	0	0	0	-4,674		-1,595	-6,269	4,674	0	1,595	6,269
Inception to date		2,031,818	0	-255,805	1,776,013	2,044,816	0	-255,687	1,789,129	-8,324	0	1,477	-6,847

Millennium Pipeline Company, LLC
Retainage Adjustment Mechanism
Valley Lateral 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
2021 Total		0	0	-3,391	-3,391	0	0	-436	-436	0	0	-2,955	-2,955
2022 PPA		0	0	-11	-11	0	0	0	0	0	0	-11	-11
Inception to date		0	0	-3,402	-3,402	0	0	-436	-436	0	0	-2,966	-2,966
2022	1	0	0	-135	-135	0	0	-544	-544	0	0	409	409
2022	2	0	0	-202	-202	0	0	-563	-563	0	0	361	361
2022	3	0	0	-186	-186	0	0	-562	-562	0	0	376	376
2022	4	0	0	-35	-35	0	0	-504	-504	0	0	469	469
2022	5	0	0	-14	-14	0	0	-191	-191	0	0	177	177
2022	6	0	0	-40	-40	0	0	-489	-489	0	0	449	449
2022	7	0	0	-23	-23	0	0	-509	-509	0	0	486	486
2022	8	0	0	-24	-24	0	0	-517	-517	0	0	493	493
2022	9	0	0	-23	-23	0	0	-382	-382	0	0	359	359
2022	10	0	0	-32	-32	0	0	-485	-485	0	0	453	453
2022	11	0	0	-22	-22	0	0	-451	-451	0	0	429	429
2022	12	0	0	-19	-19	0	0	-471	-471	0	0	452	452
2022 Total		0	0	-755	-755	0	0	-5,668	-5,668	0	0	4,913	4,913
2023 reallocation adjustment								-500	-500	0	0	500	500
Inception to date		0	0	-4,157	-4,157	0	0	-6,104	-6,104	0	0	2,447	2,447