

**Before the Public Service Commission**

**THE BROOKLYN UNION GAS COMPANY D/B/A NATIONAL GRID NY**

**And**

**KEYSPAN GAS EAST CORPORATION D/B/A NATIONAL GRID**

**Direct Testimony**

**of**

**Elizabeth D. Arangio**

**Dated: April 2019**

**Testimony of Elizabeth D. Arangio**

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## Testimony of Elizabeth D. Arangio

1     **I.     Introduction and Qualifications**

2     **Q.     Please state your name and business address.**

3     A.     My name is Elizabeth D. Arangio. My business address is 40 Sylvan Road,  
4            Waltham, Massachusetts 02451.

5  
6     **Q.     Please describe your business position and responsibilities.**

7     A.     I am the Director of Gas Supply Planning with responsibility for the gas supply  
8            resource portfolios of National Grid USA's ("National Grid") local gas  
9            distribution companies in New York, including The Brooklyn Union Gas  
10           Company d/b/a National Grid NY ("KEDNY") and KeySpan Gas East  
11           Corporation d/b/a National Grid ("KEDLI") (collectively the "Companies"). In  
12           addition to the New York portfolios, I am responsible for planning the gas  
13           resource portfolios of National Grid's New England subsidiaries. I also manage  
14           National Grid's gas Customer Choice programs.

15  
16    **Q.     Please summarize your educational background and your professional  
17            experience.**

18    A.     I graduated from the University of Massachusetts in 1991 with a Bachelor of  
19            Business Administration. In 1995, I graduated from Bentley College with a  
20            Master of Business Administration. From 1991 to 1994, I worked as a Gas  
21            Accounting Analyst in the Marketing Operations Department at Algonquin Gas  
22            Transmission Company. In 1994, I joined Boston Gas Company as a Gas Supply  
23            Analyst. In 1997, I was promoted to Group Leader Transportation Services, with

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1 responsibility for managing all activities associated with the customer choice  
2 program. In 1998, I was promoted to Director of Gas Acquisition and  
3 Transportation Services and assumed responsibility for the administration of  
4 Boston Gas's gas resource portfolio and customer choice program in  
5 Massachusetts and, in 2000, the resource portfolio of EnergyNorth Natural Gas,  
6 Inc. in New Hampshire. In February 2004, I assumed the additional responsibility  
7 for gas supply planning for the Companies' resource portfolios. Following the  
8 acquisition of KeySpan Corporation by National Grid, I was named to my current  
9 position and assumed added responsibility for National Grid's gas resource  
10 portfolios in Upstate New York and Rhode Island. In August 2018, I assumed the  
11 added responsibility of managing National Grid's gas Customer Choice programs.

12

### **II. Purpose of Testimony**

13 **Q. What is the purpose of your testimony?**

14 A. The purpose of my testimony is to:

15 (i) describe the Companies' efforts to purchase gas supply, pipeline  
16 transportation, and storage services on a reliable, least-cost basis in the  
17 twelve months ended December 31, 2018 ("Historic Test Year"), the  
18 twelve months ending March 31, 2021 ("Rate Year"), the twelve months  
19 ending March 31, 2022 ("Data Year 1"), the twelve months ending March  
20 31, 2023 ("Data Year 2") and the twelve months ending March 31, 2024  
21 ("Data Year 3," and together with Data Years 1 and 2, "Data Years");  
22

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- 1 (ii) discuss the Companies' efforts to supplant pipeline capacity with  
2 additional indigenous and renewable gas supplies;
- 3 (iii) discuss the existing gas supply constraints in the downstate New York  
4 area and the potential impact on the Companies' ability to meet forecast  
5 demand, the Companies' efforts to alleviate the supply shortage by  
6 supporting additional pipeline capacity to the region, and the potential  
7 need to impose a moratorium on new or additional gas service if  
8 constraints are not resolved;
- 9 (iv) present the Companies' forecast of gas costs for the Rate Year;
- 10 (v) describe the results of the marginal cost gas supply studies for the Rate  
11 Year;
- 12 (vi) discuss the Companies' Gas Cost Volatility Program; and
- 13 (vii) discuss the Companies' Customer Choice Program.

14

15 Pursuant to the New York State Public Service Commission's ("Commission")  
16 "Order Authorizing Combined Gas Portfolios" issued October 28, 2005 in Case  
17 05-G-0903, as of November 2005, the Companies have combined the planning  
18 and dispatching of their gas supply portfolios to provide the Companies'  
19 customers enhanced reliability of supply and lower costs. Therefore, my  
20 testimony addresses the combined portfolios of the Companies and the material I  
21 present is applicable to both KEDNY and KEDLI.

22

23

## Testimony of Elizabeth D. Arangio

1 **Q. Does your testimony include any exhibits?**

2 A. Yes. My testimony includes the following exhibits that were prepared under my  
3 supervision and direction:

4 Exhibit \_\_ (EDA-1) KEDNY & KEDLI Portfolio Schematics;

5

6 Exhibit \_\_ (EDA-2) KEDNY & KEDLI Pipeline Transportation Contracts;

7

8 Exhibit \_\_ (EDA-3) KEDNY & KEDLI Storage Contracts;

9

10 Exhibit \_\_ (EDA-4) KEDNY/KEDLI Projected Monthly Gas Stored Volumes  
11 and Dollars for the Rate Year and Data Years Summarized  
12 by Market Area, Gulf Coast and LNG storage;

13

14 Exhibit \_\_ (EDA-5) KEDNY/KEDLI Purchased Gas Expense for the Twelve  
15 Months Ending (“TME”) December 31, 2018;

16

17 Exhibit \_\_ (EDA-6) KEDNY/KEDLI Forecast of Variable Gas Expense for the  
18 TME March 31, 2021, 2022, 2023 and 2024;

19

20 Exhibit \_\_ (EDA-7) KEDNY/KEDLI Forecast of Purchased Gas Expense for  
21 the TME March 31, 2021, 2022, 2023 and 2024;

22

23 Exhibit \_\_ (EDA-8) KEDNY & KEDLI Estimated Marginal Commodity Cost  
24 of Gas;

25

26 Exhibit \_\_ (EDA-9) KEDNY & KEDLI Estimated Annualized Marginal  
27 Capacity Cost of Gas;

28

29 Exhibit \_\_ (EDA-10) KEDNY & KEDLI Non-Migration Capacity Release  
30 Revenues; and

31

32 Exhibit \_\_ (EDA-11) KEDNY & KEDLI OSS Transaction Revenues.

33

34

35 **III. Gas Supply Portfolio**

36 **Q. Please describe the Companies’ gas distribution systems.**

37 A. KEDNY’s gas distribution system serves Brooklyn, Staten Island, and portions of  
38 Queens, all located within New York City. KEDLI’s gas distribution system  
39 serves a portion of Queens not served by KEDNY, as well as Nassau and Suffolk

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1 counties on Long Island. KEDNY and KEDLI are parties to an agreement with  
2 Consolidated Edison Company of New York, Inc. (“Con Edison”) concerning the  
3 ownership and operation of the New York Facilities System (“NYFS”), the high-  
4 pressure gas transmission system serving the three downstate New York  
5 distribution companies. This agreement permits the parties to contract for the  
6 transportation and receipt of gas from various interstate pipelines that interconnect  
7 with the NYFS, including Transcontinental Gas Pipeline Company LLC  
8 (“Transco”), Texas Eastern Transmission LP (“Texas Eastern”), Iroquois Gas  
9 Transmission System LP (“Iroquois”), and Tennessee Gas Pipeline Company,  
10 LLC (“Tennessee”). KEDNY and KEDLI contract for service from each of these  
11 pipelines as well as various other upstream pipelines and storage service  
12 providers.

13  
14 **Q. Please describe the Companies’ gas supply planning process.**

15 A. Typically, in the spring of each year, the Gas Supply Department develops plans  
16 to meet the Companies’ gas supply obligation for the annual period from  
17 November 1 of that year through October 31 of the following year. This planning  
18 process begins with an updated ten-year demand forecast that provides the  
19 foundation for customer requirements that ultimately determine incremental  
20 pipeline, storage, or peaking needs.

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1   **Q.    What are the Companies’ combined forecast design day requirements for the**  
2       **Rate Year and Data Years?**

3    A.    The Companies’ design day requirements are as follows:

- 4           •   Rate Year = 2,894 MDth (thousand dekatherms)/day
- 5           •   Data Year 1 = 2,912 MDth/day
- 6           •   Data Year 2 = 2,954 MDth/day
- 7           •   Data Year 3 = 2,987 MDth/day

8  
9   **Q.    What is the basis for the Companies’ city gate requirements?**

10   A.    The primary firm demand (*i.e.*, core customer load forecast) forms the basis for  
11       the Companies’ gas supply portfolio. The primary firm demand is the demand  
12       imposed on the Companies by their firm customers, regardless of whether they  
13       purchase gas commodity from the Companies or energy service companies  
14       (“ESCOs”). Pipeline and storage capacity, along with peaking assets, are used to  
15       satisfy the primary firm demand. An annual load duration curve or similar  
16       approach is utilized to structure capacity contracts to best meet the shape and  
17       frequency of the anticipated loads and to assure the Companies’ ability to meet  
18       those loads. The Companies do not incorporate any reserve margin assumptions  
19       when developing their design weather forecasts and capacity requirement  
20       determinations.

21



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1 **Q. What contracts or assets are included in the Companies' existing portfolio?**

2 A. Exhibit \_\_ (EDA-1) sets forth schematics of the Companies' gas portfolios and  
3 provides their maximum delivery entitlements from various sources of supply,  
4 including underground storage contracts.

5  
6 **Q. Please describe Exhibit \_\_ (EDA-2) – Pipeline Transportation Contracts.**

7 A. Exhibit \_\_ (EDA-2) summarizes the firm pipeline transportation capacity and  
8 bundled peaking assets in the Companies' gas supply portfolio for the 2018-2019  
9 winter season (November 1, 2018 to March 31, 2019). Listed for each contract is  
10 information concerning the service provider (pipeline or supplier), tariff rate  
11 schedule, contract volume, and contract expiration date.

12  
13 **Q. Please describe Exhibit \_\_ (EDA-3) – Storage Contracts.**

14 A. Exhibit \_\_ (EDA-3) summarizes the Companies' firm storage contracts and the  
15 transportation contracts used to deliver storage withdrawal volumes to the city  
16 gate for the 2018-2019 winter season. Listed for each contract is information  
17 concerning the storage service provider, tariff rate schedule, contract volume, and  
18 contract expiration date.

19

20 The Companies source gas supply at the following liquid points:

21

- 22 • Dawn, Ontario
- 23 • Transco, zone 4
- 24 • Dominion, South Point
- 25 • Tx. Eastern, M-3
- 26 • Transco, zone 6 N.Y.

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- 1 • Transco, zone 6 non-N.Y.
- 2 • Transco, zone 6 non-N.Y. North
- 3 • Transco, zone 3
- 4 • Iroquois, receipts (Waddington)
- 5 • Texas Eastern, M-2 receipts
- 6 • Tennessee, zone 4-300 Leg (Marcellus)
- 7 • Iroquois, zone 2
- 8 • Transco, zone 1
- 9 • Millennium, East receipts
- 10 • Dominion, North Point
- 11 • Leidy Hub
- 12 • Transco, zone 2
- 13 • Transco, Leidy Line receipts
- 14 • Tennessee, zone 5 White Plains (no index)
- 15

16 **Q. What is the role of underground storage in satisfying customer**  
17 **requirements?**

18 A. Approximately 31 percent of the Companies' normal winter supply obligation and  
19 28 percent of their design day demand requirement are met by deliveries of gas  
20 withdrawn from storage. Under the Companies' storage contracts, storage  
21 deliverability typically declines as inventory decreases (known as "withdrawal  
22 ratchets"). Once reached, these ratchets cannot be reversed until the following  
23 year. Therefore, the Companies establish a storage withdrawal plan prior to the  
24 winter season to maintain inventories at levels that allow sufficient storage  
25 deliverability to meet forecast winter peak conditions (storage rule curve).

26

27 Market area storage provides the Companies with services that cannot be easily  
28 duplicated with other assets. The most important attribute of storage assets is  
29 flexibility, which is vital in serving changing customer requirements. The  
30 Companies' Transco storage service contracts provide end-of-day balancing that

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1 minimize the risk of over/under run penalties. Whereas typical supply purchases  
2 must be dispatched at the same volume for each day of a weekend or holiday,  
3 storage allows enhanced flexibility by allowing intraday adjustments to meet  
4 changing conditions. In addition, storage improves the load factor of flowing  
5 pipeline assets and is critical in meeting design weather conditions. This value  
6 cannot be duplicated by replacing storage with Marcellus production. The  
7 Companies utilize a least-cost dispatch to fill storage. Where Marcellus shale  
8 supplies present an opportunity to displace long haul supplies for storage refill,  
9 the Companies take advantage of the economically priced supply.

10  
11 The Companies also have approximately 20 billion cubic feet (“Bcf”) of Gulf  
12 Coast storage capacity. These storage fields are made available to ESCOs as part  
13 of the optional Gulf Coast storage release that occurs every April. Assuming no  
14 ESCOs opt-in for the Gulf Coast storage release, approximately 4.5 Bcf of the  
15 total capacity is reserved for *force majeure* purposes. The remaining 15 Bcf of  
16 capacity, usually the entire KEDNY Washington Storage Service (“WSS”) field,  
17 is utilized for off-system sales (“OSS”). If all ESCOs opt-in, the capacity utilized  
18 for OSS would be reduced accordingly.

19  
20 **Q. What is the role of liquefied natural gas (“LNG”) in the Companies’**  
21 **portfolio?**

22 A. The Companies maintain two on-system LNG facilities in Greenpoint, Brooklyn  
23 and Holtsville, Long Island. The Greenpoint LNG facility allows KEDNY to

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1 store approximately 1.6 Bcf of gas and has peak day vaporization capability of  
2 approximately 291,000 dekatherms (Dth) per day. The Holtsville LNG facility  
3 allows KEDLI to store approximately 0.6 Bcf of gas and has vaporization  
4 capability of 103,000 Dth/day. Collectively, the Greenpoint and Holtsville LNG  
5 facilities provide the Companies with approximately 10 percent of their peak day  
6 gas supplies.

7  
8 LNG provides the Companies with on-system services that cannot be easily  
9 duplicated with other assets. Because these resources can be brought on line  
10 quickly, the LNG plants can be used to meet hourly fluctuations in demand,  
11 maintain deliveries to customers, and balance pressures across portions of the  
12 distribution system during periods of high demand. Most importantly, these  
13 resources are vital in preserving delivery pressures in the event that an off-system  
14 resource becomes unavailable.

15  
16 **Q. What changes are planned related to swing services, peak shaving or winter**  
17 **peaking assets, facilities, or operations for the Rate Year through a five-year**  
18 **planning horizon?**

19 A. As further discussed in the direct testimony of the Gas Infrastructure and  
20 Operations Panel (“GIOP”), the Companies plan to take the Holtsville LNG  
21 facility out of service for critical maintenance repairs in April 2022. This planned  
22 capital work, however, is contingent on the availability of additional supply  
23 expected to be provided by the Northeast Supply Enhancement (“NESE”) project

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1 by December 2020. There are no other planned changes related to swing services,  
2 peak shaving or winter peaking assets, facilities or operations through a five-year  
3 planning horizon.

4

5 **Q. What are the projected monthly beginning and ending volumes and dollar**  
6 **balances for gas stored through the end of the Rate Year and Data Years?**

7 A. Exhibit \_\_ (EDA-4) provides the projected monthly volume and cost of injections  
8 and withdrawals for the Companies' underground and LNG storage facilities for  
9 the Rate Year and Data Years, summarized by market area, Gulf Coast, and LNG  
10 storage.

11

12 **A. Indigenous and Renewable Natural Gas**

13 **Q. Do the Companies purchase supply from any local natural gas production?**

14 A. Currently, the Fresh Kills Landfill ("Landfill"), located in Staten Island, is the  
15 Companies' only source of local production and accounts for less than one  
16 percent of the total system throughput. The Landfill is owned by the City of New  
17 York. KEDNY has a supply agreement with the Landfill for up to 6,500 Dth/day,  
18 but there is no contractual minimum daily quantity. Landfill supply is directly fed  
19 into the distribution system.

20

21 The Companies' use of local production has not changed over the past several  
22 years; the Companies continue to purchase any supply the Landfill can provide.  
23 There is no forecast of Landfill production, but the Gas Control department

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1 communicates with the Landfill regularly and is notified of maintenance work and  
2 outages. When the Landfill is unable to sell supply, the Companies replace  
3 planned volumes with other resources in the portfolio.

4  
5 The table below shows the Landfill's production for the last three years:

Year	Total (Dth)
2016	510,838
2017	406,245
2018	448,990

6  
7 Additionally, as discussed in the direct testimony of the Future of Heat Panel, the  
8 Companies expect a new bio-gas facility at Newtown Creek to be placed into  
9 service by November 2019. The new facility is expected to produce  
10 approximately 275,000 Dth/year (750 Dth/day) of renewable natural gas  
11 ("RNG").

12  
13 **Q. What steps are the Companies taking to capture the benefits of connecting**  
14 **additional indigenous and RNG gas supplies directly to their distribution**  
15 **systems?**

16 A. KEDNY and KEDLI recently updated their Gas Transportation Operating  
17 Procedures ("GTOP") manual to include a "Renewable Natural Gas Engineering  
18 Services Agreement" template and "Gas Sales (Interconnect) Agreement"  
19 template. These documents define the respective responsibilities of the developer  
20 and the Companies in connecting new RNG projects. The agreements also list the

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1 billing and payment terms and conditions, gas quality specifications, and other  
2 relevant provisions for interconnecting to the Companies' distribution systems.  
3 The "Gas Sales (Interconnect) Agreement" template is modeled after the existing  
4 agreement with the Landfill.

5  
6 Further, the Companies recently collaborated in the development of the "NYS  
7 Interconnect Guide for RNG" document along with the Gas Technology Institute  
8 ("GTI"), Northeast Gas Association ("NGA"), and other gas distribution  
9 companies in New York State. The document establishes a clear process for both  
10 project developers and utilities to successfully connect RNG projects. Please  
11 refer to the testimonies of GIOP and Future of Heat Panel for further discussion.

12  
13 **Q. What efforts are the Companies making to reduce their pipeline capacity?**

14 A. Pipeline capacity is an integral component of the Companies' gas supply portfolio  
15 to deliver sufficient natural gas to serve our customers. While pipeline capacity  
16 cannot be entirely displaced, the Companies continue to explore ways to reduce  
17 reliance on pipeline capacity. As discussed in the Future of Heat Panel's  
18 testimony, the Companies are pursuing various decarbonization initiatives  
19 including renewable gas projects to reduce their carbon footprint while meeting  
20 customer needs.

21

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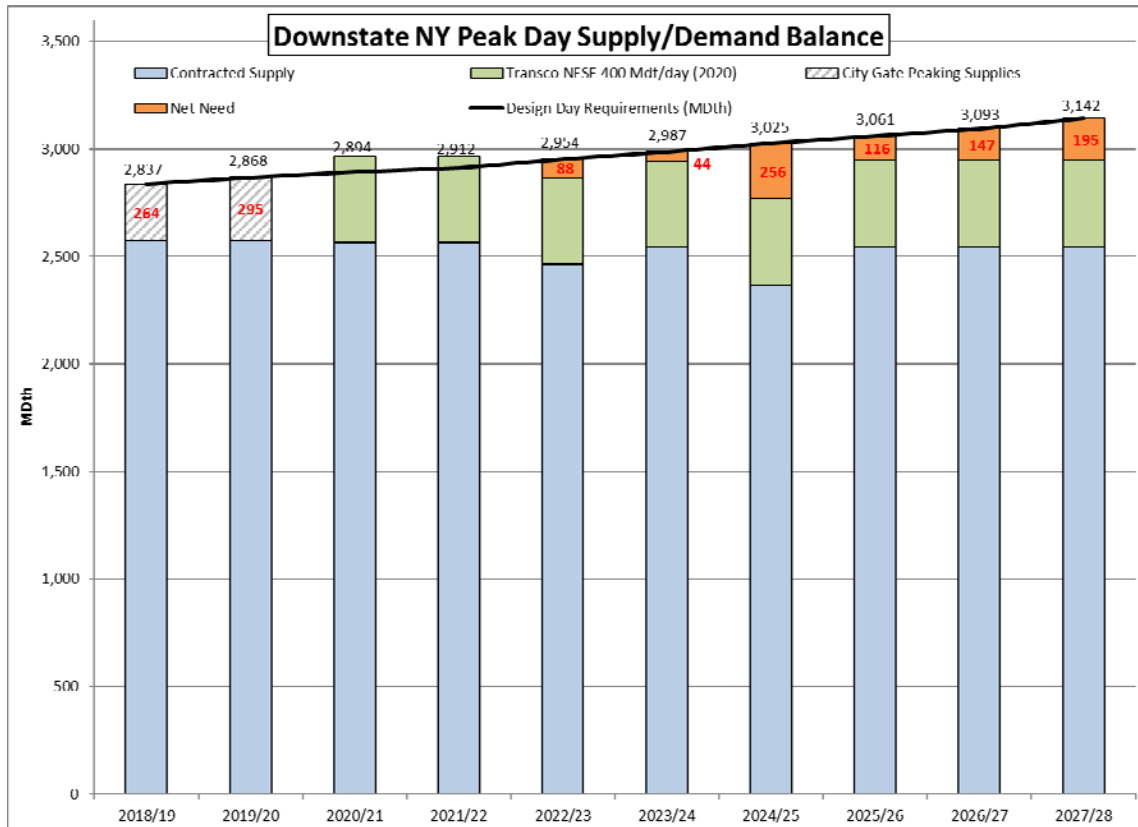
1                    **B. Northeast Supply Enhancement Project**

2    **Q. Do the Companies plan to add any incremental pipeline capacity in the next**  
3    **five years to meet forecast design day load requirements?**

4    A. Yes. Due to continued customer interest in conversions from oil to natural gas for  
5    space and water heating, as well as increased demand from existing customers  
6    and new construction in their service territories, the Companies have continued to  
7    experience growth in the demand for natural gas. The Companies' ten-year load  
8    forecasts show that demand for gas will continue to grow. KEDNY and KEDLI  
9    expect the demand for gas to grow at an annual rate of more than 1.3 percent and  
10   1.0 percent for the next ten years, respectively. The graph below shows the  
11   balance between the forecast demand and the Companies' supply portfolio for the  
12   ten-year period ending 2027/28. The graph shows that without significant  
13   additional pipeline capacity, as further described below, supply falls short of the  
14   demand.



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In response to the forecast growth, KEDNY and KEDLI signed precedent agreements with Transco to deliver an additional 400,000 Dth of natural gas per day to the downstate New York area. To provide the additional supply, Transco will expand its existing pipeline system along Pennsylvania, New Jersey, and New York to connect to the Companies’ system in the Rockaway Peninsula. The NESE project will provide access to abundant and economical gas supplies, thereby relieving supply constraints in the Companies’ service territories. Furthermore, NESE will include a fully looped pipeline segment to interconnect with the existing delivery lateral in New York Bay, further enhancing reliability of the system. The Companies have contracted for 100 percent of the incremental pipeline capacity that will become available via NESE.

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1 **Q. What will be the impact to the Companies' ability to meet forecast demand if**  
2 **the NESE project is not completed in time?**

3 A. In the absence of additional pipeline capacity, the Companies cannot continue to  
4 add new gas load without creating an unacceptable risk of significant supply  
5 shortfalls and corresponding drops in system pressure to below minimum  
6 thresholds. Such conditions will jeopardize the reliability of service and public  
7 safety for the Companies' existing firm customers.

8  
9 As can be seen in the graph above, the Companies' current supply planning  
10 assumes that the NESE project will be completed in time to meet the forecast  
11 growth in demand for natural gas. Currently, NESE is awaiting permit approval  
12 from New York Department of Environmental Conservation. If the project does  
13 not become available by the 2020/21 winter season, the Companies will not be  
14 able to prudently satisfy new or additional service requests without jeopardizing  
15 the Companies' ability to provide safe, reliable service to its existing firm  
16 customers. In that case, National Grid will have no choice but to impose a  
17 moratorium on new and additional gas service in affected areas to maintain  
18 system reliability.

19  
20 The GIOP direct testimony addresses NESE's impact to the Companies' capital  
21 projects. Notably, as mentioned above, the Companies will not be able to take  
22 their LNG facilities out of service to complete necessary maintenance repairs if  
23 NESE is not completed in time.

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1 **IV. Portfolio Management**

2 **Q. Please describe the Companies' gas supply planning goals.**

3 A. The Companies' primary gas supply planning goals are to:

- 4 (i) Dispatch the gas supply portfolio assets under a least-cost strategy to  
5 reliably meet projected primary firm demand;
- 6 (ii) Maintain a diverse portfolio of gas supply, storage, and transportation  
7 capacity contracts with varying terms and pricing provisions; and
- 8 (iii) Implement a formal hedging program to mitigate price volatility.

9

10 These goals are consistent with the Commission's "Statement of Policy Regarding  
11 Gas Purchasing Practices" issued in Case 97-G-0600 and updated by letter issued  
12 March 31, 2011. The Companies maintain a portfolio that meets requirements  
13 under design conditions while maintaining sufficient flexibility for mild winters.

14

15 The Companies monitor these goals with regular meetings (monthly supply plan,  
16 quarterly review, and annual RFP review). Pursuant to Recommendation IX-4  
17 from the final audit report in the Commission's previous gas management audit  
18 (Case 13-G-0009), the Companies established a process for the quarterly review  
19 of gas supply procurement plans compared to actual purchases for a sample of  
20 days during the quarter. The review identifies variances in volumes and the use  
21 of storage and delivery pipelines caused by weather, market conditions,  
22 operational constraints, or other factors. Variances are reviewed for patterns and  
23 opportunities to improve the procurement process. The Companies' Energy

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1 Procurement group has been conducting quarterly reviews since 2015. Reviews  
2 are attended by representatives from Gas Supply Planning, Gas Trading, and  
3 Origination and Price Volatility Management.

4  
5 **Q. Please describe the Companies' gas purchasing process.**

6 A. The Companies contract for quantities of gas to ensure sufficient supply to  
7 reliably meet design conditions, as well as to account for daily and seasonal load  
8 variations. A combination of term and spot contracts provides necessary  
9 flexibility with respect to volume, which allows the Companies to respond to  
10 fluctuations in demand. Both term and spot contracts are firm to ensure  
11 reliability. The varying provisions in these contracts allow for pricing diversity as  
12 well.

13  
14 Term Contracts

15 Term contracts have durations of longer than one month and less than one year.  
16 These contracts generally have a specified fixed daily base load quantity  
17 necessary to satisfy requirements under a "warm winter" scenario and may  
18 include some summer storage refill quantities. Other term contracts provide call  
19 options to buy bundled gas supplies delivered either to the Companies' city gates  
20 or other upstream supply points. KEDNY and KEDLI also utilize no-notice  
21 storage to manage variations in load that allow the Companies to automatically  
22 withdraw or inject gas at the end of the day to balance system load.

23

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1 Term contracts are generally priced monthly. In addition to first-of-the-month  
2 (FOM) published indices, monthly prices for some term domestic supply  
3 contracts also use the New York Mercantile Exchange (“NYMEX”) last day settle  
4 price plus a competitively bid location basis differential. Monthly pricing ensures  
5 the effectiveness of the NYMEX futures contracts entered as part of the  
6 Companies’ hedging strategy.

### 7 8 Spot Contracts

9 Spot contracts are firm contracts with a term of one month or less. There are no  
10 specific contractual triggers that require the purchase of spot gas. These contracts  
11 are made throughout the year to supplement term contract supplies, manage  
12 demand variations due to weather, and maintain storage inventory targets. Spot  
13 contracts also provide pricing diversity (*i.e.*, daily index vs. monthly index).

14  
15 The Companies purchase spot gas from a number of qualified and reliable  
16 suppliers who have North American Energy Standards Board (“NAESB”)  
17 contracts to minimize risk and obtain competitive pricing. The amount of  
18 capacity available depends on the time of year and storage availability.

19  
20 Daily spot purchases are priced either at reliable, daily published index prices or  
21 at a negotiated short-term (daily) fixed price.

22

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1 **Q. What is the current level of natural gas supply used by the Companies to**  
2 **meet normal customer requirements, and how will that amount change in the**  
3 **Rate Year?**

4 A. Of the 230 Bcf of forecast normal customer requirements for November 2018 to  
5 October 2019, the Companies are required to purchase approximately 201 Bcf.  
6 The remainder will be procured by ESCOs. For the Rate Year, forecast normal  
7 customer requirements are approximately 221 Bcf, with 208 Bcf served by the  
8 Companies and the remainder by ESCOs.

9  
10 **Q. How do the Companies evaluate expiring contracts for gas supply?**

11 A. As decision dates for contract extension/termination approach, the Companies  
12 determine the need to maintain and or modify (to the extent possible) each  
13 contract as part of the resource portfolio. The Companies use several criteria to  
14 assess the need for transportation and storage contracts including but not limited  
15 to: receipt point liquidity, reliability, complement to the existing portfolio, and  
16 economics.

17  
18 Also, the Companies consider options to replace long-haul capacity with shorter-  
19 haul capacities. For example, as supplies from the Marcellus shale region became  
20 abundant and readily accessible, the Companies did not renew expiring long-haul  
21 contracts with Union, TransCanada, and Empire pipelines that delivered more  
22 expensive supplies from Dawn, Canada.

23

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1 While the current level of Transco long haul capacity is required to serve the  
2 Companies' peak day and peak season needs, it is not always the least cost option  
3 for supply. Recently, the Companies were able to reduce the path on Transco  
4 long-haul contracts to reduce fixed costs. Effective March 1, 2019, the  
5 Companies have agreed to turnback 40 percent (27,473 Dth/day) of their  
6 combined entitlements from Zone 1 (Sta 30). Transco will allow the remaining  
7 portion (41,210 Dth/day) to be turned back as early as October 2020. After the  
8 turnbacks, the Companies will still be able to reliably fill 100 percent of the  
9 original contract volumes at downstream points. The option to reduce capacity  
10 paths is not one typically offered by the pipelines, so, when the opportunities  
11 occur, the Companies will seek to take full advantage of such de-contracting  
12 providing such options do not have an adverse effect on the reliability and  
13 economics of the portfolio.

14  
15 **Q. Does the Companies' supply purchasing strategy enable them to benefit from**  
16 **the increased production from the Marcellus and Utica shale regions?**

17 A. Yes. KEDNY and KEDLI purchased approximately 75.6 Bcf from the Northeast  
18 producing region during the 2017/18 winter. In addition, KEDNY and KEDLI  
19 purchased approximately 17.0 Bcf from the Gulf Coast and 3.7 Bcf from  
20 Canadian transportation paths.

21  
22 The table below shows the Companies' actual purchases from November 2017  
23 through March 2018. Over the last several years, the Companies have decreased

## Testimony of Elizabeth D. Arangio

1 reliance on Gulf Coast and Canadian resources, while increasing reliance on  
2 points associated with Marcellus shale.

### **Firm Transportation**

Gulf Coast 11.0%

Canadian 2.0%

Marcellus Shale 50.0%

**Total Firm Transportation 64.0%**

Storage Withdrawals 34.0%

Peaking Supplies 1.6%

Local LNG Vapor 0.4%

**Total 100.0%**

3

4 For the Historic Test Year, the Companies met their city gate requirements as  
5 follows:

6 96.4% Domestic purchases and underground storage

7 3.4% Canadian purchases at Dawn and Waddington

8 <1% LNG and Landfill

9

10 Based on current and forecast prices, the Companies expect continued reliance on  
11 domestic supply purchases and underground storage going forward.

12



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1     **Q. Do the Companies engage in off-system sales, capacity release and other**  
2     **arrangements to reduce their total gas costs?**

3     A. Yes. The Companies constantly monitor their gas resource portfolio to ensure  
4     that the appropriate mix of pipeline transportation capacity, market area storage,  
5     bundled city gate supply, and peaking resources are available to serve projected  
6     firm design requirements. To further minimize costs, the Companies seek to  
7     optimize portfolio assets when they are not being utilized for the benefit of firm  
8     customers. Except for Gulf Coast storage, for the Rate Year and beyond, the  
9     Companies have no plans to enter any pre-arranged off-system sales, capacity  
10    release, or streaming arrangements that would encumber upstream assets. As in  
11    years past, once the winter heating season begins, the Companies will actively  
12    pursue opportunities to sell available supply and/or capacity in a manner that does  
13    not diminish overall supply adequacy, reliability or operational flexibility to firm  
14    customers. For example, on warm days in shoulder months when pipeline  
15    capacity is not fully utilized, the Companies will seek to sell excess capacity to  
16    off-system customers. Under this type of transaction, the Companies will  
17    purchase supply and transport gas on available pipeline capacity and then assess  
18    the associated variable costs plus a negotiated margin to the off-system customers.  
19    The Companies will also look for opportunities to execute physical pipeline trades  
20    where available. Under such trades, the Companies would purchase firm supply  
21    delivered to the city gate on one interstate pipeline and sell a like amount of  
22    supply to another third party at a higher price on a different interstate pipeline.

23

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1 The Companies hold approximately 20 Bcf of production area storage that is used  
2 to:

- 3 1. maintain supply reliability during force majeure supply outages in the Gulf  
4 coast;
- 5 2. balance on-system loads;
- 6 3. support the Companies' Price Volatility Management Program; and
- 7 4. make off-system production area sales.

8 KEDNY and KEDLI used approximately 15.4 Bcf of that capacity for production  
9 area off-system sales for the 2018/19 winter. The amount of Gulf Coast storage  
10 capacity released to marketers under the retail access program for 2018/19 was  
11 12,920 Dth. At this time, the Companies do not propose to modify their OSS  
12 practices.

13

14 **Q. Do the Companies enter into asset management agreements (“AMAs”) to**  
15 **maximize the value of their supply portfolio and reduce their overall supply**  
16 **costs?**

17 A. Yes. The Companies currently have eight AMAs in place for the 2018/19 period.  
18 These arrangements permit the Companies to benefit from the expertise of third-  
19 parties who are more familiar with market conditions and opportunities in  
20 particular regions or on particular pipeline systems while still maintaining access  
21 to essential firm supply sources. The terms of these arrangements do not exceed  
22 one year. The Companies will explore beneficial opportunities to enter asset  
23 optimization agreements in the future as current agreements expire.

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1 Below are the list of current AMAs and a summary of the terms:

2 KEDNY:

- 3 • Counterparty: Nextera Energy Marketing, LLC
- 4 ○ Key terms: Baseload or Daily Call (April 2019-October 2019);
- 5 Transco Contract 1006500; Transco Z2/Z3 Gulf to Transco Z6
- 6 Leidy NNY; November 2018-October 2019; 10,688 Dth/day;
- 7 • Counterparty: J. Aron & Company LLC
- 8 ○ Key terms: Daily Call (November 2018-March 2019); Transco
- 9 Long-Haul Station 65 to Transco Z6 Narrows NY; November
- 10 2018-October 2019; 25,000 Dth/day;
- 11 • Counterparty: EQT Energy, LLC (“EQT”)
- 12 ○ Key terms: Daily Call (November 2018-March 2019); Transco
- 13 Long-Haul Station 65 to Transco Z6 Narrows NY; November
- 14 2018-October 2019; 25,000 Dth/day; and
- 15 • Counterparty: Emera Energy Services, Inc. (“Emera”)
- 16 ○ Key terms: Daily Call (December 2018- April 2019); Union Dawn
- 17 to Iroquois S. Commack; December 2018-October 2019; 57,498
- 18 Dth/day.

19 KEDLI:

- 20 • Counterparty: EQT
- 21 ○ Key terms: Daily Call (November 2018-March 2019); Transco
- 22 Long-Haul Station 65 to Transco Z6 Long Beach NY; November
- 23 2018-October 2019; 25,000 Dth/day;

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- 1           • Counterparty: Emera
  - 2               ○ Key terms: Daily Call (December 2018- April 2019); Union Dawn
  - 3               to TransCanada Waddington; December 2017-October 2018;
  - 4               25,357 Dth/day;
- 5           • Counterparty: Emera
  - 6               ○ Key terms: November Daily Call; Base-Load Winter Supplies
  - 7               (December 2018-March 2019); Off-Peak Season Daily Call on any
  - 8               60 days during April 2019-October 2019; Additional Call on any
  - 9               Day during the Term; NE07 capacity; Millennium Corning to
  - 10              Iroquois S. Commack; November 2018-October 2019; 25,000
  - 11              Dth/day; and
- 12          • Counterparty: Consolidated Edison Energy, Inc.
  - 13              ○ Key terms: November Daily Call; Base-Load Winter Supplies
  - 14              December 2018-March 2019; Off-Peak Season Daily Call on any
  - 15              60 days during the period April 2019-October 2019; Additional
  - 16              Call on any Day during the Term; NE07 capacity; Millennium
  - 17              Corning to Iroquois S. Commack; November 2018-October 2019;
  - 18              50,000 Dth/day.

19           The Companies regularly evaluate the contracts in their supply portfolio, taking  
20           into account market interest in the asset, whether the resource is utilized by the  
21           Companies to meet baseload or swing requirements on a seasonal or year-round  
22           basis, intraday flexibility of the asset, and whether the Companies believe the  
23           resource may be better managed by a third party. At this time, the Companies

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1 determined that the existing AMAs are in the best interest of the firm gas  
2 customer but will consider additional opportunities in future years based on  
3 market conditions.

4

5 **Q. Do the Companies have existing or previous gas supply arrangements with**  
6 **any affiliated marketing/trading organizations?**

7 A. No.

8

9 **Q. What are the revenues received over the last five fiscal years (April 2014 –**  
10 **January 2019) from releases to shippers other than on-system customers that**  
11 **have migrated from bundled sales to transportation service?**

12 A. Exhibit \_\_ (EDA-10) summarizes the revenues received from non-migration  
13 capacity releases. Over the five-year period (April 2014 – January 2019), the  
14 revenues received from such capacity releases totaled \$37.5 million, of which  
15 \$31.9 million (85 percent) was credited to customers and the remaining \$5.6 (15  
16 percent) was retained by the Companies.

17

18 **Q. What are the revenues received over the last five fiscal years (April 2014 –**  
19 **January 2019) from OSS transactions, WSS transactions, and AMAs?**

20 A. Exhibit \_\_ (EDA-11) summarizes the revenues received from revenues received  
21 from off-system sales transactions. Over the five-year period (April 2014 –  
22 January 2019), the revenues received from off-system sales transactions, WSS  
23 transactions and AMAs totaled \$284.2 million, of which \$241.7 million (85

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1 percent) was credited to customers and the remaining \$42.5 million (15 percent)  
2 was retained by the Companies.

3

4 **Q. Please describe Exhibit \_\_ (EDA-5) – Purchased Gas Expense.**

5 A. Exhibit \_\_ (EDA-5) shows the Companies’ purchased gas expense for the  
6 Historic Test Year. This expense includes the purchased cost of gas minus the  
7 cost of storage injections plus the cost of storage withdrawals, and all pipeline  
8 fixed and variable charges.

9

10 **Q. Please describe Exhibit \_\_ (EDA-6) – Forecast of Variable Gas Expense TME**  
11 **March 31, 2021, 2022, 2023 and 2024.**

12 A. Exhibit \_\_ (EDA-6) shows the projected commodity prices of the various natural  
13 gas supplies that are forecast to be purchased and delivered to the Companies for  
14 the Rate Year and the Data Years to serve the estimated requirements of the  
15 Companies’ firm customers under the assumption of normal weather. This  
16 commodity price projection serves as the basis for the forecast of purchased gas  
17 expense developed for these periods. A least cost dispatch analysis was  
18 performed to determine the mix of flowing supplies and storage withdrawals that  
19 would be dispatched to the city gate each month to serve estimated normal firm  
20 customer demand.

21

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1 **Q. Please describe Exhibit \_\_ (EDA-7) – Forecast of Purchased Gas Expense**  
2 **TME March 31, 2021, 2022, 2023 and 2024.**

3 A. Exhibit \_\_ (EDA-7) shows a forecast of purchased gas expense for the Rate Year  
4 and Data Years. This expense includes the purchased cost of gas minus the cost  
5 of storage injections plus the cost of storage withdrawals, and all pipeline fixed  
6 and variable charges. The forecast assumes the NESE project is available by the  
7 2020/21 winter season. If it is not, the Companies will update the forecast in  
8 corrections and updates.

9  
10 **Q. How do the Companies review and monitor the costs associated with their**  
11 **pipeline capacity?**

12 A. The Companies closely monitors and reviews all rate and tariff filings submitted  
13 to the Federal Energy Regulatory Commission (“FERC”) by the interstate natural  
14 gas pipelines with whom the Companies contract for service. The Companies  
15 will intervene, and when necessary, actively participate in such proceedings to  
16 ensure the Companies continue to pay fair rates and receive just and reasonable  
17 service. In interstate pipeline base rate proceedings, the Companies often  
18 participate with other local distribution company customers in a shipper group,  
19 which will retain an expert witness to advance commonly-held positions and  
20 enhance the Companies’ influence. The Companies also regularly engage in  
21 settlement discussions with gas pipelines and FERC Staff to settle tariff-related  
22 matters without the need for a formal and costly hearing process. More broadly,  
23 the Companies monitor all natural gas related activity at FERC to stay abreast of

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1 and influence policy developments that could impact the Companies and their  
2 customers. The Companies track FERC orders, attend technical conferences  
3 convened by FERC to address major policy issues, and submit comments in  
4 response to notices of proposed rulemaking and notices of inquiry issued by  
5 FERC on policy matters impacting wholesale gas markets.

### 6 7 **V. Marginal Cost Studies**

#### 8 **Q. Please describe Exhibit \_\_ (EDA-8) – Estimated Marginal Commodity Cost** 9 **of Gas For Period: November 1, 2020 through March 31, 2021.**

10 A. Exhibit \_\_ (EDA-8) shows the projected marginal gas commodity costs for the  
11 period November 1, 2020 to March 31, 2021. By running two dispatch  
12 simulations, the marginal gas supply sources that would be dispatched to serve an  
13 incremental increase in customer demand were identified. First, a baseline  
14 dispatch on the simulation model was prepared to establish the least-cost mix of  
15 gas supplies that would be dispatched to serve firm sales customer demand under  
16 normal weather. Then, the simulation model was rerun with an increased  
17 customer demand of 1,000 Dth per day over the winter months (November  
18 through March) to identify those marginal supplies that would be dispatched to  
19 serve the increased demand. The exhibit reflects the average monthly commodity  
20 cost of the marginal supplies that were dispatched.

21



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1 **Q. Please describe Exhibit \_\_ (EDA-9) – Estimated Annualized Marginal**  
2 **Capacity Cost of Gas for Period November 1, 2020 through March 31, 2021.**

3 A. Exhibit \_\_ (EDA-9) shows the projected annualized marginal gas capacity cost  
4 for the period November 1, 2020 to March 31, 2021. This study incorporates the  
5 fixed costs of new capacity that the Companies would acquire for the Rate Year to  
6 reliably meet projected design demand growth. Based on this calculation, the  
7 annualized marginal capacity cost was determined to be \$1.12 per dekatherm, as  
8 set forth on Exhibit \_\_ (EDA-9).

9  
10 **VI. Customer Choice Program**

11 **Q. Describe the Companies' Customer Choice Program.**

12 A. The Companies' Customer Choice Program provides customers the option to  
13 purchase their supplies from Marketers. There are two service options, Daily and  
14 Monthly Balancing. The Companies currently assign to Marketers at maximum  
15 rates such interstate pipeline transportation and storage capacity as is necessary to  
16 meet migrating firm customers' load. This practice is consistent with the  
17 Commission's August 30, 2007 Order in Case 07-G-0299. City gate pipeline and  
18 storage capacity contracted for core customers is assigned to Retail Marketers for  
19 migrating customers in proportion to the anticipated design day load of the  
20 customers. All migrating firm customers are required to participate in the  
21 Companies' mandatory assignment program.

22

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1 **Q. What service classes are available to transportation customers?**

2 A. For KEDNY, transportation customers can receive service under Service  
3 Classification (“SC”) 17 Firm and SC-18 Non-firm. For KEDLI, transportation  
4 service is available under SC-5 Firm, SC-7 Non-Firm, and SC-13 Non-Firm.

5  
6 **Q. How are transportation customer imbalances tracked and reconciled?**

7 A. When an ESCO customer’s meter is read, the customer’s account transaction is  
8 sent from the customer system to the Companies’ Gas Transportation Information  
9 System (“GTIS”). GTIS then compares the ESCO’s expected deliveries, adjusted  
10 for actual weather for the billing period, to the customer’s actual usage for that  
11 same period. The usage is prorated into the applicable calendar month based on  
12 actual degree days. Thereafter, a cash-out index price is applied to the difference  
13 between the ESCO’s deliveries and customer usage. Cancel and rebill activity  
14 will be captured in the month in which the cancel or the rebill occurred as far back  
15 as three years. There have been no imbalance penalties assessed to a customer in  
16 the last three years.

17  
18 **Q. Were there any problems or issues arising from implementation of the**  
19 **Commission's August 30, 2007 and March 28, 2008 Mandatory Capacity**  
20 **Release Orders (in Case 07-G-0299) and FERC Order 712?**

21 A. The Companies have not experienced any issues from implementation of the  
22 Commission’s Mandatory Release orders. The Companies no longer have any  
23 ESCO capacity that is grandfathered to the city gate.

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1 **Q. What are the pipelines and allocation percentages being utilized for the**  
2 **mandatory assignment of capacity?**

3 A. The table below provides a list of the pipelines being utilized for mandatory  
4 assignment of capacity, and the allocated percentage of each, for Winter 2018-  
5 2019.

Transco Long Haul	29.7%
Transco Leidy	4.4%
Transco Leidy Seasonal	2.5%
Transco Rockaway	17%
Tetco Long Haul	7.1%
Tetco Leidy Short Haul	5.6%
Dominion Leidy	7.0%
Tennessee	2.6%
Northeast 07	15.1%
Dawn to Iroquois	9.0%

6

7 **Q. What process, if any, is utilized to true-up any differences between the**  
8 **Companies' weighted average cost of capacity ("WACOC") and the charges**  
9 **paid by marketers and direct customers for released capacity?**

10 A. For the 2017/2018 winter season (November 2017 through October 2018), the  
11 Companies' WACOC was between \$0.8872 and \$0.9006 per Dth. There is no  
12 true-up and/or reconciliation process in place to account for any differences in  
13 cost.

14

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1 **Q. Did the Companies implement any changes to their Customer Choice**  
2 **Programs as a result of the non-firm service collaborative in the 2016**  
3 **KEDNY Rate Case?**

4 A. Yes. In accordance with the “Order Approving Tariff Provisions and Directing  
5 Further Tariff Filings” issued February 7, 2019 following the non-firm service  
6 collaborative in the 2016 KEDNY Rate Case, the Companies modified their  
7 Customer Choice Programs to address concerns raised by ESCOs that participated  
8 in the collaborative.

9  
10 First, the Companies modified their procedures for accepting month-ahead and  
11 day-ahead nominations to allow ESCOs more flexibility with the delivery points.  
12 Whereas ESCOs were previously required to deliver 100 percent of their supplies  
13 on Transco, they are now permitted to deliver gas supply on behalf of their  
14 temperature controlled (“TC”) and interruptible (“IT”) customers up to the  
15 following percentage of their TC and IT customers’ total requirements:

- 16 • Transco – up to 100 percent
- 17 • Texas Eastern – up to 50 percent
- 18 • Iroquois – up to 50 percent
- 19 • Tennessee – up to 6 percent

20 These modifications do not apply to power generation customers who have  
21 negotiated points of receipt in their gas transportation agreements.

22

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1 Second, the Companies modified their operating procedures to allow ESCOs  
2 serving non-firm loads and power generation customers to request access to any  
3 available city gate capacity on an intra-day basis. To request access to such  
4 capacity, ESCOs must notify the Companies by phone or email between 8:30  
5 A.M. and 10:00 A.M. prior to the start of the effective Gas Day. Between 10:00  
6 A.M. and 11:00 A.M., the Companies will allocate available capacity on a pro  
7 rata basis to each requesting ESCO and notify the ESCOs of the capacity they  
8 have received. If there is any remaining capacity after allocation, it will be made  
9 available on a first-come, first-served basis after 11:00 A.M.

10  
11 Both changes to the Companies' Customer Choice Programs have been reflected  
12 in the latest version of the GTOPs.

13  
14 **Q. Did the Companies modify the TC/IT penalties as suggested in the non-firm  
15 service collaborative in Cases 16-G-0058 and 16-G-0059?**

16 A. Yes. The Companies submitted revised tariff leaves for changing the current  
17 penalties from:

- 18 • the *higher* of (i) two times the sum of the market gas price plus the applicable  
19 IT or TC transportation rate; or (ii) nine times the applicable IT or TC sales  
20 rate, to
- 21 • the *lower* of (i) two times the sum of the market gas rate plus the applicable or  
22 IT or TC transportation rate; or (ii) nine times the applicable IT or TC sales  
23 rate

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1 This modified TC/IT penalty language provides a strong incentive for customers  
2 to switch to their alternate fuel at the designated temperature thresholds.

3

4 **Q. Are the Companies proposing to make any further changes to their**  
5 **Customer Choice Programs?**

6 A. No.

7

### 8 **VII. Gas Cost Volatility Management**

9 **Q. What steps do the Companies take to mitigate the impact of gas cost**  
10 **volatility on their customers?**

11 A. The Companies mitigate volatility in the gas commodity markets in several ways.  
12 First, they maintain a balanced portfolio that includes contract storage. This  
13 allows the Companies to inject gas during the summer for withdrawal during the  
14 winter, which enables the Companies to mitigate price volatility during the winter  
15 when demand is greatest. Second, the Companies maintain a geographically  
16 diverse gas supply portfolio that helps to reduce exposure to volatility in any  
17 single supply region. Third, the portfolio incorporates pricing diversity that  
18 minimizes exposure to volatility at a single pricing point or market index.  
19 Finally, the Companies mitigate price volatility with a formal hedging program.

20

21 **Q. Please describe the Companies' hedging program.**

22 A. The Companies' overall pricing diversity and volatility mitigation plan is to  
23 protect prices for approximately 50 percent, but no more than 60 percent, of

### **Testimony of Elizabeth D. Arangio**

1 forecast winter firm sales and to allow prices to float with the market for the  
2 remaining forecast winter sales. For this purpose, the “winter period” is defined  
3 as November through March. Prices are fixed through a combination of planned  
4 storage withdrawals, which provide a natural hedge at the average price of  
5 summer period injections, and financial hedging using NYMEX gas futures  
6 contracts or NYMEX Over the Counter (“OTC”) financial settled swaps and  
7 options using bilateral master agreements. Beginning in the 2015-2016 winter,  
8 the Companies are also using basis hedges for forecast purchases in the Northeast  
9 producing region. Locational basis swaps in conjunction with NYMEX hedges  
10 are being used because of an observed disconnect between prices in the Marcellus  
11 and Utica supply basins and NYMEX prices. The use of these locational basis  
12 swaps ensures that the Companies are mitigating volatility in the markets where  
13 they purchase supplies.

14  
15 To determine the quantity to be hedged, the Companies forecast firm sales for  
16 each month November through March, assuming normal winter weather  
17 conditions, and multiply the results by 50 percent (Step 1). Next, monthly storage  
18 withdrawals to meet system operational needs are forecast and subtracted from  
19 the result obtained in Step 1 (Step 2). The results from Step 2 equal the quantity  
20 of gas to be financially hedged to achieve the 50 percent target in each month.

21  
22 Once the volume of gas to be financially hedged each month is known, a monthly  
23 hedging plan is created. The purchases are spread evenly over 16 months starting

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1 18 months prior to the start of each November. Each financial transaction is  
2 settled against the expiring month’s last day settlement price and the applicable  
3 Inside FERC “First of the Month” index price. The gross settlement payout or  
4 gain is included in the gas cost for that month.

5

6 The table below summarizes the percentage of forecasted gas supply hedged  
7 physically and financially for November 2017-March 2018:

8

<b>Pricing Mechanism</b>	<b>Downstate NY</b>
Physical (storage)	30%
Financial (swaps and options)	19%
Index	51%

9

10 The table below itemizes the number of financial swap (futures) and option  
11 contracts hedged for the November 2017 through March 2018 winter season. The  
12 units for the data below are in contracts; one contract equals 10,000 Dth.

<b>Pricing Mechanism</b>	<b>Quantity</b>
Swaps	1,815
Options	750

13

14 **Q. Have the Companies’ hedging practices changed in the past year?**

15 A. Yes. The derivatives market at Dominion South Point has developed with enough  
16 liquidity so that the Companies can adequately acquire financially settled  
17 Dominion South Point options. The Companies have incorporated these options  
18 in the winter 2018-19 hedge portfolio. The Companies continue to monitor the



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1 effectiveness of NYMEX and South Point for all receipt points in the forecast to  
2 determine the most appropriate hedging location.

3

4 Lower market volatility and market prices have translated to lower option  
5 premiums. Options provide superior downside protection versus swaps. As a  
6 result, “lessons learned” include favoring up to 100 percent of options for the  
7 financial hedge component of the portfolios for the next winter

8

9 **Q. Please explain how the Companies calculate gas price volatility.**

10 A. Gas price volatility is measured as the standard deviation of the lognormal of the  
11 ratio of the monthly hedged price change through the winter, November through  
12 March. This standard deviation is compared against a similar calculation for the  
13 NYMEX and South Point Natural Gas monthly settlement prices for the same  
14 November through March period.

15

16 **Q. Discuss how the Companies determine the success or failure of their gas price  
17 mitigation program.**

18 A. The success or failure of the gas price mitigation program is determined by  
19 comparing the physical and financial hedged prices with natural gas market price  
20 indices over the same period. The hedge program is expected to show lower  
21 month-to-month price volatility than that of the market index.

22

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1 **Q. Please discuss internal reporting, oversight, and the audit structure of the**  
2 **Companies' gas price mitigation program.**

3 A. The Companies' hedging program reporting and oversight is documented in the  
4 US Energy Commodity Risk Management Policy. National Grid's US based  
5 energy procurement activities are managed under the direction of National Grid  
6 plc's Finance Committee. The Finance Committee authorized the Energy  
7 Procurement Risk Management Committee ("EPRMC") and delegated authority  
8 to focus on energy risk, metrics, energy strategies, financial impacts and other  
9 opportunities to the EPRMC. The EPRMC provides Vice President level review  
10 of strategies, with a focus on market risks, inclusive of price, credit, operational,  
11 liquidity and reputational risks and Policy compliance. The EPRMC serves to  
12 administer a consistent and comprehensive sanctioning process for such strategies  
13 and commitments across the organization. The EPRMC has delegated some of its  
14 authority to the Commodity Management Committee ("CMC"). The EPRMC  
15 appoints the CMC members and chairperson. The CMC provides detailed review  
16 of strategies, products and new opportunities with a focus on energy risk, metrics,  
17 financial impacts and opportunities. The CMC conducts research to understand  
18 market rules, regulatory requirements, customer needs, risks, barriers to entry,  
19 logistical requirements, competition, deal economics, risk measurement and  
20 valuation requirements, all related requirements and exposures (including credit,  
21 liquidity, tax and legal), and the impact of current and proposed strategies on  
22 existing controls and limits, while administering a consistent and comprehensive  
23 sanctioning process for such strategies and commitments across the organization.

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1 The Companies review the hedging program and highlights any changes with the  
2 Commission on an annual basis. The Companies have a comprehensive internal  
3 approval process to authorize a hedge strategy and maintain oversight  
4 requirements. Prior to execution, a hedging strategy is documented with details  
5 that may include: risks to be hedged, volumetric targets, duration and cadence of  
6 hedge plan transactions, and types of instruments to be used. This documentation  
7 is then reviewed and approved by the CMC prior to going to the EPRMC for  
8 approval and authorization.

9  
10 The Companies employs the industry standard best practice of an independent  
11 three-office model:

- 12 • The Front Office develops and executes the hedge strategies hedges in  
13 accordance with the prevailing policies and strategies by entering into  
14 transactions with counterparties to mitigate natural gas price volatility.
- 15 • Risk Management is part of the Middle Office and maintains the overall  
16 control environment and assesses compliance with the Companies' risk  
17 policy. The Middle Office reports through the Treasury organization and  
18 provides a significant level of control and independent policing of the  
19 Front Office's activities. The Middle Office confirms all trades with  
20 counterparties and monitors the risk exposures of the deals, as well as  
21 verifying approved strategies are executed in accordance with the plan.
- 22 • The Accounting Department is part of the Back Office whose functions  
23 include processes in support of the Front Office, such as accounting,

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1                   invoicing, check-outs, actualization, accounts receivable and payable, and  
2                   financial reporting. The Back Office is also independent of both the Front  
3                   and Middle Offices and reports up through the Finance organization.

4

5                   Additionally, the Companies' internal auditing department has performed audits  
6                   to ensure compliance, for example, with Sarbanes-Oxley.

7

8   **Q.   Please provide the actual price hedging performance versus planned price**  
9                   **hedging performance for the last winter season.**

10   A.   A comparison of actual price hedging performance versus planned price hedging  
11                   performance for winter 2017/2018, which includes separate quantities for each  
12                   hedging instrument, is shown in the tables below:

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### Winter 2017-18 Purchasing Plan & Projected Prices

notes	Percent Hedged	Portfolio	Amount	Price
		<b>Physical Hedges</b>		
1	32%	Market Area Storage	38,619,000	\$ 2.14
1	1%	Gulf Coast Storage	1,500,000	\$ 2.14
		Fixed Price Contracts		
		<b>Financial Hedges *</b>		
	6%	NYMEX Correlated Futures or Swaps	7,860,000	\$ 3.26
2	8%	Dom. SP Correlated Futures or Swaps	10,290,000	\$ 2.80
2	0%	Collars		
2	6%	Calls	7,500,000	\$ 2.73
		Puts		
		<b>Flowing or Floating Price Gas</b>		
	46%	NYMEX/Dom SP (18%/82%)	55,707,000	\$ 2.52
		Spot/Daily Price		
	100%	<b>TOTAL</b>	121,476,000	

### Winter 2017-18 Actual Purchases & Prices

notes	Percent Hedged	Portfolio	Amount	Price
		<b>Physical Hedges</b>		
	<b>32%</b>	Market Area Storage	41,587,000	\$ 2.02
	<b>1%</b>	Gulf Coast Storage	1,500,000	\$ 2.02
		Fixed Price Contracts		
		<b>Financial Hedges *</b>		
3	5%	NYMEX Futures or Swaps	6,700,000	\$ 3.25
2,3	9%	Dom. SP Correlated Futures or Swaps	11,450,000	\$ 2.81
2,3	0%	Collars	0	\$ -
2,3	6%	Calls	7,500,000	\$ 2.64
		Puts		
		<b>Flowing or Floating Price Gas</b>		
3	1%	Monthly Index	746,000	\$ 2.46
3	<b>20%</b>	<b>Subtotal Monthly/Baseload</b>	<b>26,396,000</b>	<b>\$ 2.86</b>
	44.0%	Spot (non-peaking)	57,855,000	\$ <b>4.10</b>
	2%	Peaking	2,500,000	\$ <b>22.40</b>
	<b>46%</b>	<b>Subtotal Spot/Daily Price</b>	<b>60,355,000</b>	<b>\$ 4.86</b>
	<b>100%</b>	<b>TOTAL</b>	<b>129,838,000</b>	<b>\$ 3.51</b>

note 1 In the ground volumes and WACOG

note 2 Financial hedges settled against Dominion SP index.

note 3 Represents total Baseload, financial and physical

1

2

## Testimony of Elizabeth D. Arangio

1 **Q. What percentage of the Companies' gas supply is physically hedged?**

2 A. As a result of planned storage withdrawals, which are based on normal weather,  
3 approximately 30 percent of the forecasted November through March firm sales  
4 demand is physically hedged. The Companies do not hedge storage injections.  
5 The Companies do not have any physical supply contracts with fixed price terms.

6

7 **Q. How do the Companies use swaps/futures?**

8 A. The Companies use OTC swaps to execute fixed price hedged transactions. OTC  
9 swaps do not have any execution, transaction or commission fees. The  
10 Companies rely on credit thresholds in their bilateral master agreements to limit  
11 the amount and frequency of margin calls associated with the daily mark-to-  
12 market valuation of each hedge transaction. When the mark-to-market with each  
13 OTC counterparty exceeds the credit threshold, the Companies use their various  
14 credit facilities to meet the cash collateral margin calls.

15

16 **Q. What types of options do the Companies use?**

17 A. The Companies use calls, puts, and collars.

18

19 **Q. Describe how the Companies decide which types of options to use.**

20 A. When the underlying futures price is expected to fall, then call options are  
21 preferred over swaps. Collars may be purchased instead to reduce the premiums  
22 paid or when the underlying futures prices are expected to be stable.

23

**Testimony of Elizabeth D. Arangio**

1 **Q. Do the Companies place a limit on what they spend on options in any year?**

2 A. The Companies cap their option premiums at \$13 million per year.

3

4 **VIII. Conclusion**

5 **Q. Does this conclude your testimony?**

6 A. Yes, it does.

7

## **Testimony of Elizabeth D. Arangio**

### **Index of Exhibits**

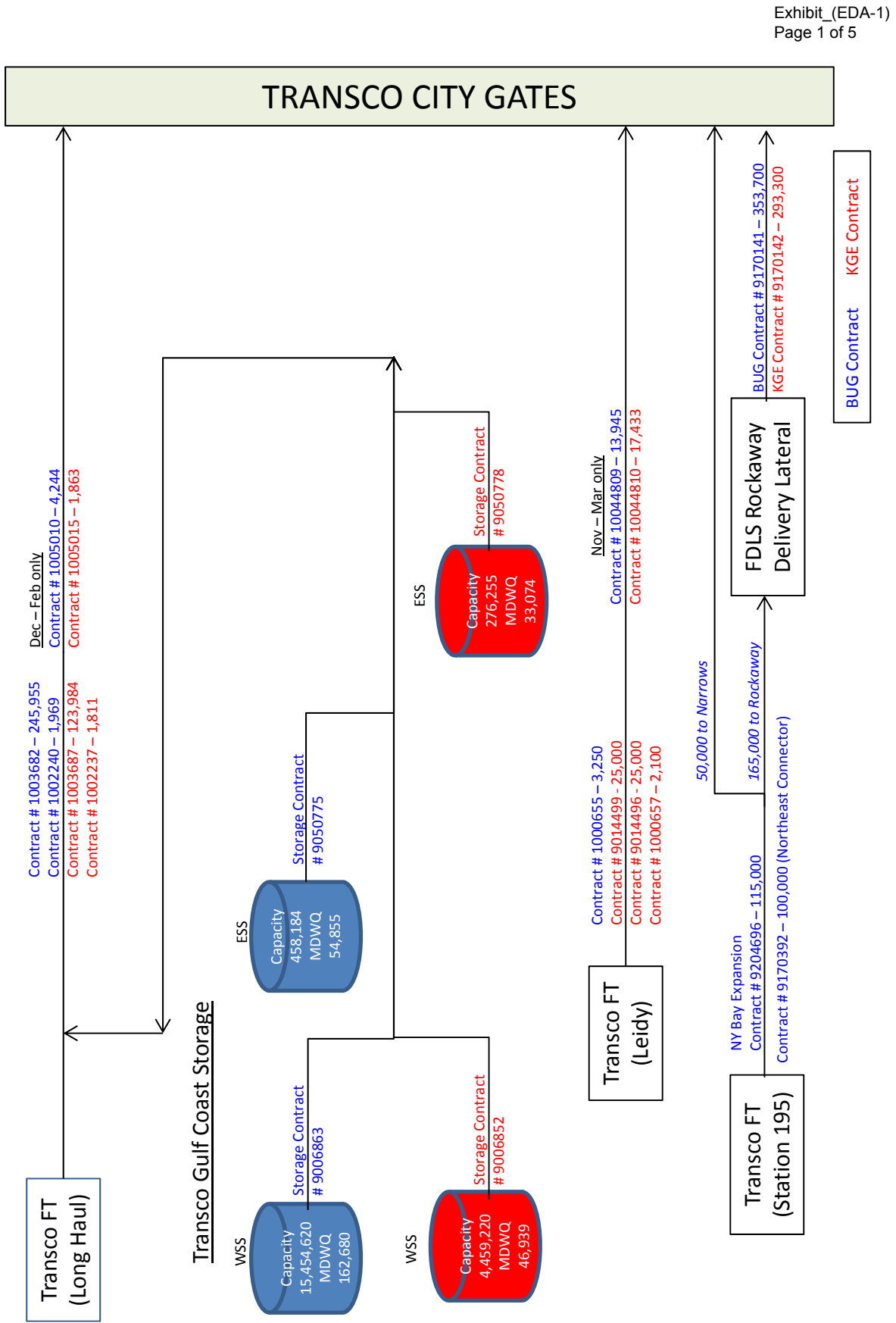
- Exhibit \_\_ (EDA-1) KEDNY & KEDLI Portfolio Schematics
- Exhibit \_\_ (EDA-2) KEDNY & KEDLI Pipeline Transportation Contracts
- Exhibit \_\_ (EDA-3) KEDNY & KEDLI Storage Contracts
- Exhibit \_\_ (EDA-4) KEDNY/KEDLI Projected Monthly Gas Stored Volumes and Dollars for the Rate Year and Data Years Summarized by Market Area, Gulf Coast and LNG storage
- Exhibit \_\_ (EDA-5) KEDNY/KEDLI Purchased Gas Expense for the Twelve Months Ending (“TME”) December 31, 2018
- Exhibit \_\_ (EDA-6) KEDNY/KEDLI Forecast of Variable Gas Expense for the TME March 31, 2021, 2022, 2023 and 2024
- Exhibit \_\_ (EDA-7) KEDNY/KEDLI Forecast of Purchased Gas Expense for the TME March 31, 2021, 2022, 2023 and 2024
- Exhibit \_\_ (EDA-8) KEDNY & KEDLI Estimated Marginal Commodity Cost of Gas
- Exhibit \_\_ (EDA-9) KEDNY & KEDLI Estimated Annualized Marginal Capacity Cost of Gas
- Exhibit \_\_ (EDA-10) KEDNY & KEDLI Non-Migration Capacity Release Revenues
- Exhibit \_\_ (EDA-11) KEDNY & KEDLI Off-System Sales (“OSS”) Transaction Revenues



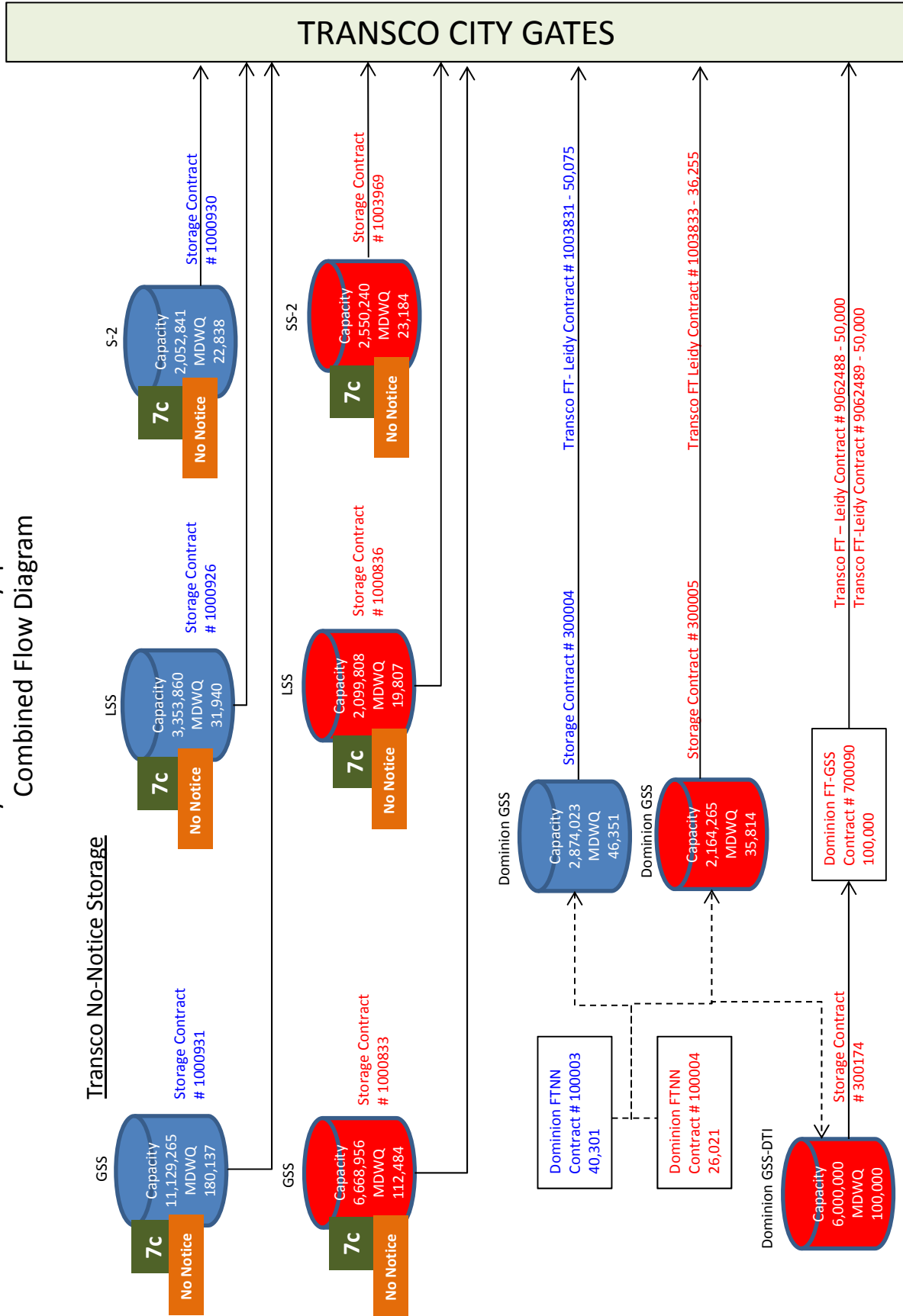
Exhibit \_\_ (EDA-1)

KEDNY & KEDLI Portfolio Schematics

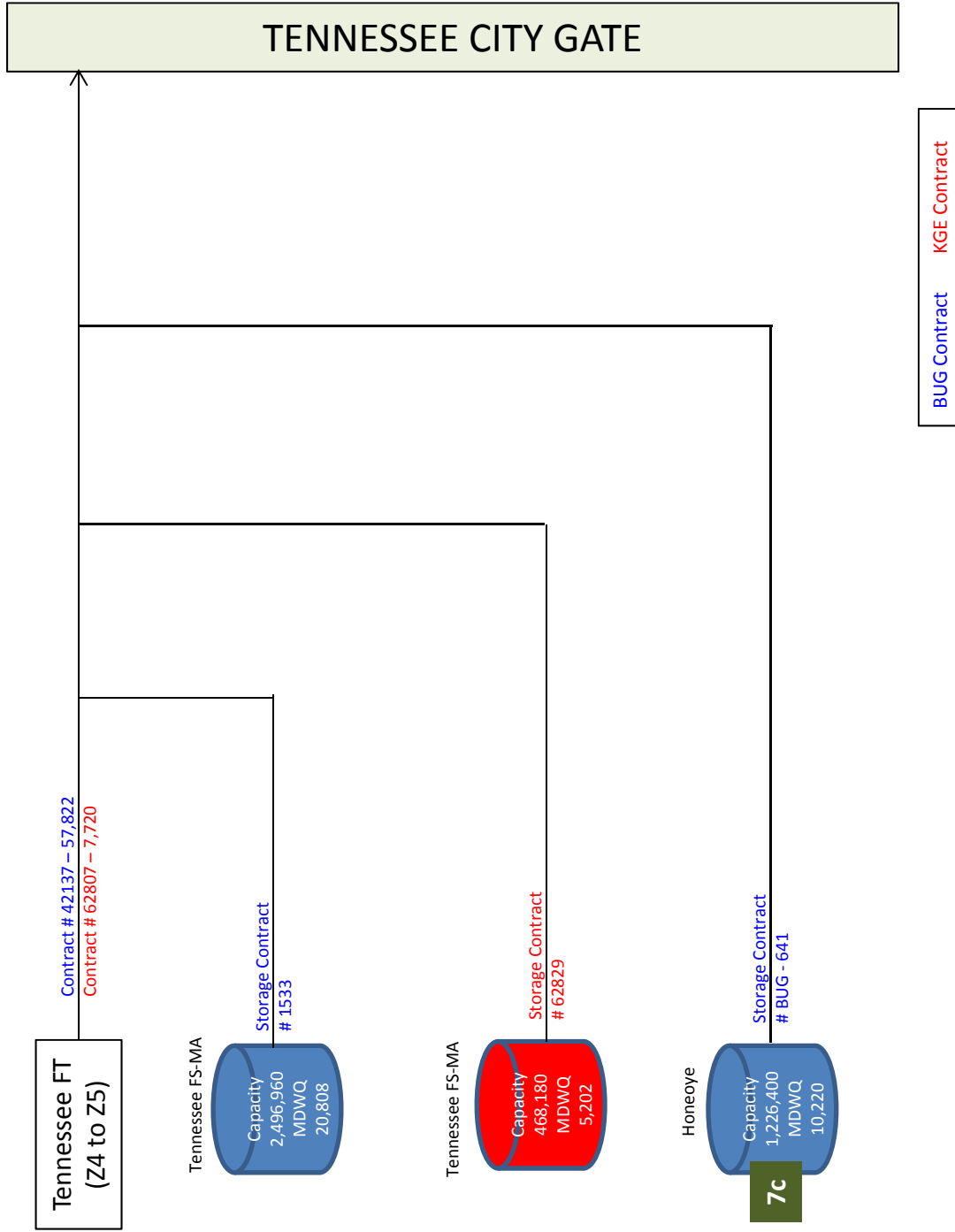
# Brooklyn Union Gas & KeySpan Gas East Combined Flow Diagram



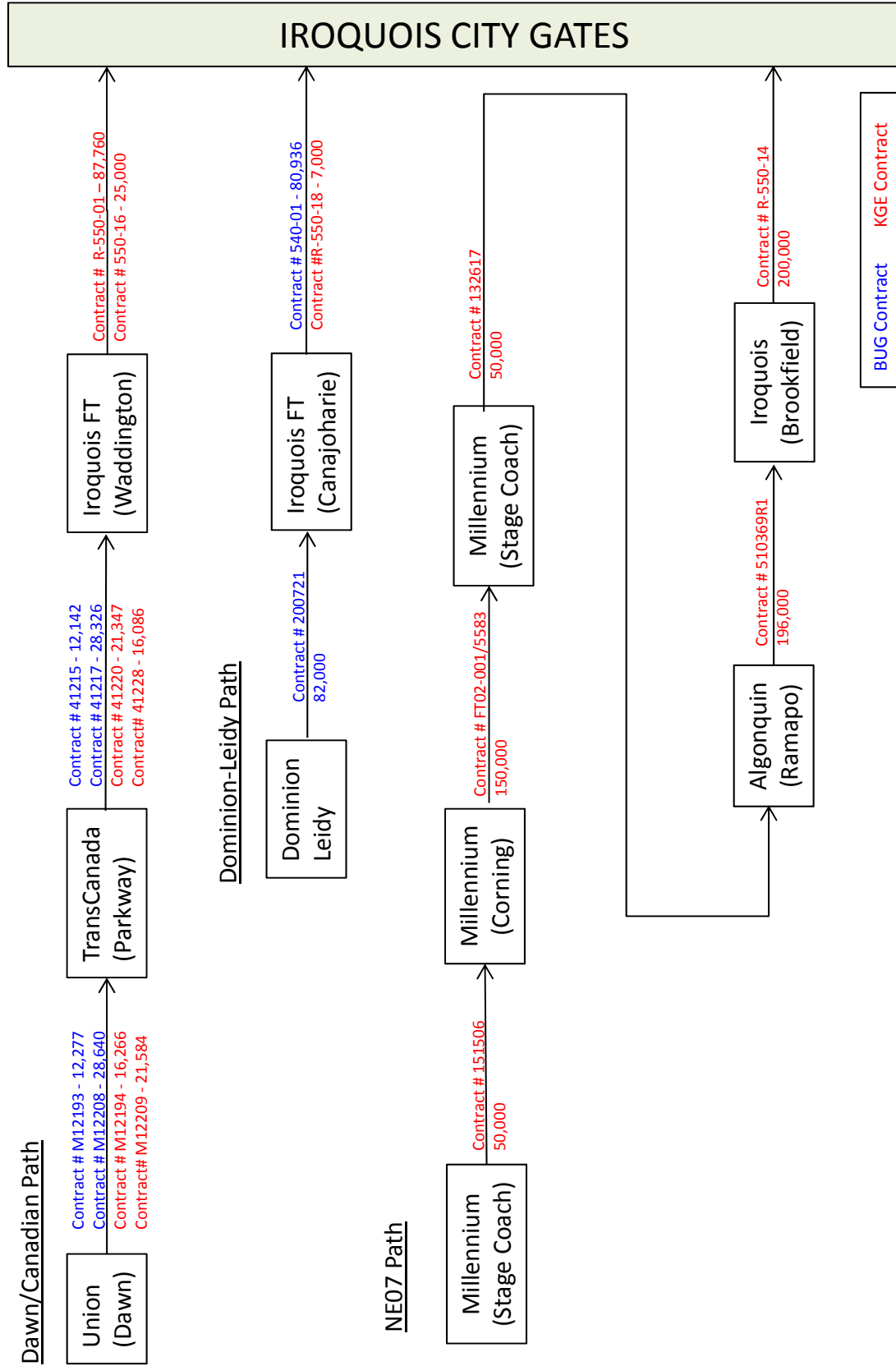
# Brooklyn Union Gas & KeySpan Gas East Combined Flow Diagram



# Brooklyn Union Gas & KeySpan Gas East Combined Flow Diagram



## Brooklyn Union Gas & KeySpan Gas East Combined Flow Diagram



# Brooklyn Union Gas & KeySpan Gas East Combined Flow Diagram

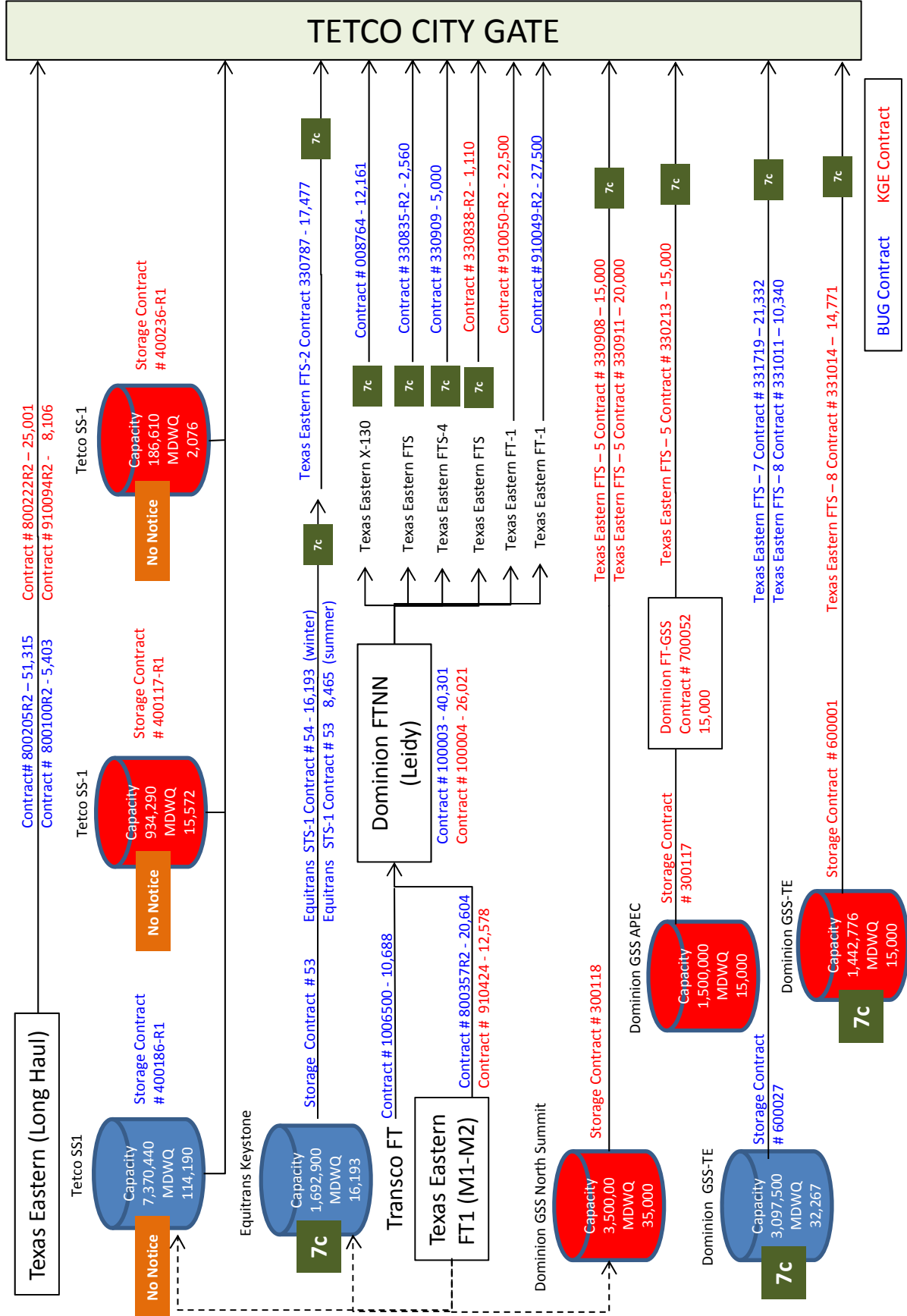


Exhibit \_\_ (EDA-2)

KEDNY & KEDLI Pipeline Transportation Contracts

### KEDNY Pipeline Transportation Contracts

Pipeline Company Name	Rate Schedule	Daily Quantity (DT)	Expiration Date
<b>Flowing Gas To Citygate</b>			
Transco Year-Round	FT	245,955	5/31/2020
Transco Year-Round	FT	1,969	3/19/2020
Transco Seasonal - 90 Day	FT	4,244	7/31/2020
Texas Eastern	CDS	51,315	10/31/2020
Texas Eastern	CDS	5,403	10/31/2020
Tennessee	FT-A	57,822	5/31/2022
Iroquois	RTS	80,936	11/1/2022
Transco* 1/	FT (X-265)	3,500	4/4/2014
Transco	FT (X-266)	3,250	12/31/2020
Texas Eastern	FTS	2,560	10/31/2020
Texas Eastern *	FT-1	27,500	3/31/2023
Texas Eastern	FTS-4-2	5,000	12/1/2019
Texas Eastern	X-130	12,161	10/31/2019
Transco (avail Nov - Mar)	FT	13,945	3/31/2013
Transco	FDLS	353,700	5/14/2030
<b>Upstream Pipeline Support <sup>1</sup></b>			
First Leg			
Transco	FT	10,688	10/31/2019
Texas Eastern	FT-1	20,604	10/31/2024
Dominion	FTNN	40,301	3/31/2023
Dominion - New Market Project 5/	FT	82,000	10/31/2031
TransCanada (Dawn to Wad)	FT	12,142	10/31/2022
TransCanada (Dawn to Wad)	FT	28,326	10/31/2022
Union (Dawn to Parkway)	M12	28,640	10/31/2020
Union (Dawn to Parkway)	M12	12,277	10/31/2020
Equitrans Keystone SS-3 Storage, Winter 2/	STS-1	16,193	4/1/2020
Equitrans Keystone SS-3 Storage, Summer 2/	STS-1	8,465	4/1/2020
Transco	FT	100,000	5/14/2030
Transco	FT	115,000	11/1/2032
<b>Deliveries from Storage</b>			
Dominion GSS Storage 1/	FT (X-285)	50,075	12/13/2019
Transco GSS Market Area Storage 3/	GSS	180,137	3/31/2023
Transco LSS Market Area Storage 3/	LSS	31,940	3/31/2023
Transco S-2 Market Area Storage 3/	S-2	22,838	4/15/2020
Equitrans Keystone SS-3 Storage	FTS-2	17,477	3/31/2020
Texas Eastern SS-1 Market Area Storage 3/	SS-1	114,190	4/30/2024
Dominion GSS-TE Storage	FTS-7	21,332	4/15/2020
Dominion GSS-TE Storage	FTS-8	10,340	3/31/2020
<b>Winter Peaking Service</b>			
<b>Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)</b>			
		<b>1,178,889</b>	

<sup>1</sup> Capacity used to deliver gas to pipelines that deliver to the citygate.

\* Contract does NOT have renewal rights.

1/ Effective 10/1/2016, contract consolidation

2/ Transportation associated with Keystone Storage.

3/ Bundled Transportation and Storage contracts.



**KEDLI Pipeline Transportation Contracts**

<b>Pipeline Company Name</b>	<b>Rate Schedule</b>	<b>Daily Quantity (DT)</b>	<b>Expiration Date</b>
<b>Flowing Gas To Citygate</b>			
Transco Year-Round 2/	FT	154,287	5/31/2020
Transco Year-Round	FT	1,811	2/24/2020
Transco Seasonal - 90 Day	FT	1,863	7/31/2020
Texas Eastern	CDS	8,106	10/31/2019
Texas Eastern	CDS	25,001	10/31/2019
Tennessee	FT-A	7,720	5/31/2022
Iroquois	RTS	87,760	11/1/2021
Iroquois	RTS	25,000	11/1/2021
Iroquois NE07	RTS	200,000	11/1/2023
Transco	FT (X-271)	2,100	1/31/2019
Transco 3/	FT (X-287)	536	10/31/2019
Texas Eastern	FTS	1,110	10/31/2019
Texas Eastern *	FT-1	22,500	3/31/2023
Transco (avail Nov - Mar)	FT	17,433	3/31/2020
Transco Leidy East	FT	25,000	3/31/2020
Transco Market Link	FT	25,000	11/30/2019
Transco	FDLS	293,300	5/14/2030
Iroquois	RTS	7,000	11/1/2021
<b>Upstream Pipeline Support <sup>1</sup></b>			
Texas Eastern	FT-1	12,578	10/31/2019
Dominion	FTNN	26,021	3/31/2023
TransCanada (Dawn to Wad)	FT	16,086	10/31/2024
TransCanada (Dawn to Wad)	FT	21,347	10/31/2024
Union (Dawn to Parkway)	M12	21,584	10/31/2020
Union (Dawn to Parkway)	M12	16,266	10/31/2020
Millennium	FT-1	150,000	12/31/2023
Millennium	FT-1	50,000	12/31/2023
Millennium	FT-1	50,000	12/31/2023
Algonquin	AFT-1	196,000	10/31/2023
<b>Deliveries from Storage</b>			
Dominion GSS Storage 3/	FT (X-287)	35,689	10/31/2007
Leidy to Long Island for Dominion DTI GSS	FT	50,000	12/12/2027
Leidy to Long Island for Dominion DTI GSS	FT	50,000	12/12/2027
Transco GSS Market Area Storage 4/	GSS	112,484	3/31/2023
Transco LSS Market Area Storage 4/	LSS	19,807	3/31/2023
Transco SS-2 Market Area Storage 4/	SS-2	23,184	3/31/2020
Texas Eastern SS-1 Market Area Storage 4/	SS-1	2,076	4/30/2020
Texas Eastern SS-1 Market Area Storage 4/	SS-1	15,572	4/30/2020
Dominion GSS N. Summit	FTS-5	20,000	3/31/2020
Dominion GSS N. Summit	FTS-5	15,000	3/31/2020
Dominion GSS Apec	FTS-5	15,000	3/31/2020
Dominion GSS-TE Storage	FTS-8	14,771	3/31/2020
GSS "Apec"	FT-GSS	15,000	3/31/2022
DTI GSS	FT-GSS	100,000	3/31/2022
<b>Winter Peaking Service</b>			
<b>Total (Flowing Gas to City Gate, Deliveries from Storage, and Winter Peaking Service)</b>			
		<b>985,810</b>	

<sup>1</sup> Capacity used to deliver gas to pipelines that deliver to the citygate.

\* Contract does NOT have renewal rights.

1/ Capacity used to deliver gas to pipelines that deliver to the citygate.

2/ The actual max daily contract volume is 154,287 dt/day, 30,303 dt/day is released to the Brooklyn Navy Yard.

3/ MDQ is 36,225 dth/day

4/ Bundled Transportation and Storage contracts.

Exhibit \_\_ (EDA-3)

KEDNY & KEDLI Storage Contracts

### KEDNY Storage Contracts

Storage Company Name	Rate Schedule	MDWQ Dth/Day	Expiration Date
<b>Market Area Storage</b>			
Transco	GSS	180,137	3/31/2023
Transco	LSS (1)	31,940	3/31/2023
Transco	S-2	22,838	4/16/2020
Texas Eastern	SS-1	114,190	4/30/2024
Equitrans-Keystone	SS-3/STS-1	16,193	4/1/2020
Tennessee	FS-MA (5)	20,808	10/31/2019
Honeoye	SS-NY (7)	10,220	4/1/2020
Dominion	GSS (3)	46,351	3/31/2023
Dominion	GSS-TE (4)	32,267	3/31/2021
<b>Total</b>		<b>474,944</b>	
<b>Gulf Coast Storage</b>			
Transco	WSS (2)	162,680	8/31/2019
Transco	ESS (6)	54,855	4/11/2019
<b>Total</b>		<b>217,535</b>	

\*\* Deliveries do not reflect fuel losses at the Citygate

- (1) Extended term of LSS from March 31, 1994 to March 31, 2013 by amendment dated March 31, 2008.
- (2) Quantity reduced to 162,680 from 181,819 by amendment dated 5/1/2011.
- (3) Extended term of GSS to March 31, 2013 by amendment dated July 20, 2006.
- (4) Extended term of GSS-TE from March 31, 2006 to March 31, 2013 by amendment dated July 20, 2006.
- (5) Extended term of FS-MA to October 31, 2014 by amendment dated August 1, 2008.
- (6) Contract volumes reduced to reflect the abandonment of ESS caverns 1-4
- (7) The Company cannot withdraw maximum amount from Honeoye Storage due to transportation MDQ

### KEDLI Storage Contracts

Storage Company Name	Rate Schedule	MDWQ Dth/Day	Expiration Date
<b>Market Area Storage</b>			
Transco	GSS	112,484	3/31/2023
Transco	LSS (1)	19,807	3/31/2023
Transco	SS-2	23,184	3/31/2028
Texas Eastern	SS-1	15,572	4/30/2024
Texas Eastern	SS-1	2,076	4/30/2020
Tennessee	FS-MA	5,202	10/31/2020
Dominion	GSS	35,814	3/31/2023
Dominion	GSS-TE (3)	15,000	3/31/2021
Dominion	GSS-N Summit	35,000	3/31/2022
Dominion	GSS-APEC	15,000	3/31/2022
Dominion	GSS	100,000	3/31/2022
<b>Total</b>		<b>379,139</b>	
<b>Gulf Coast Storage</b>			
Transco	WSS (2)	46,939	8/31/2020
Transco	ESS (4)	33,074	3/4/2019
<b>Total</b>		<b>80,013</b>	

\*\* Deliveries do not reflect fuel losses at the Citygate

- (1) Extended term of LSS from March 31, 1994 to March 31, 2013 by amendment dated March 31, 2008.
- (2) Quantity reduced to 46,939 from 52,461 by amendment dated 5/1/2011.
- (3) Extended term of GSS-TE from March 31, 2006 to March 31, 2011 by amendment dated August 20, 2004.
- (4) Contract volumes reduced to reflect the abandonment of ESS caverns 1-4

Exhibit \_\_ (EDA-4)

KEDNY/KEDLI Projected Monthly Gas Stored Volumes and Dollars for the Rate Year and Data  
Years Summarized by Market Area, Gulf Coast and LNG storage

KEDNY / KEDLI

Projected Gas Storage Inventory

Twelve Months Ended March 2021

Market Area	Forecast Apr-2020	Forecast May-2020	Forecast Jun-2020	Forecast Jul-2020	Forecast Aug-2020	Forecast Sep-2020	Forecast Oct-2020	Forecast Nov-2020	Forecast Dec-2020	Forecast Jan-2021	Forecast Feb-2021	Forecast Mar-2021
<b>Dth</b>												
Beginning Inventory	686,000	3,864,000	13,632,000	23,109,000	32,356,000	41,675,000	50,763,000	59,072,000	57,950,000	44,896,000	24,834,000	8,730,000
Injections	3,613,000	9,768,000	9,477,000	9,247,000	9,319,000	9,088,000	8,308,000	1,484,000	5,000	-	-	5,000
Withdrawals	435,000	-	-	-	-	-	-	2,605,000	13,059,000	20,062,000	16,104,000	7,963,000
EndingBalance	3,864,000	13,632,000	23,109,000	32,356,000	41,675,000	50,763,000	59,072,000	57,950,000	44,896,000	24,834,000	8,730,000	773,000
<b>\$</b>												
Beginning Inventory	\$ 1,691,000	\$ 8,892,000	\$ 29,119,000	\$ 48,739,000	\$ 67,490,000	\$ 86,405,000	\$ 103,414,000	\$ 118,808,000	\$ 116,746,000	\$ 90,485,000	\$ 49,992,000	\$ 17,642,000
Injections	\$ 8,172,000	\$ 20,227,000	\$ 19,620,000	\$ 18,751,000	\$ 18,915,000	\$ 17,008,000	\$ 15,395,000	\$ 3,212,000	\$ 12,000	\$ -	\$ -	\$ 13,000
Withdrawals	\$ 971,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,275,000	\$ 26,273,000	\$ 40,493,000	\$ 32,350,000	\$ 15,967,000
EndingBalance	\$ 8,892,000	\$ 29,119,000	\$ 48,739,000	\$ 67,490,000	\$ 86,405,000	\$ 103,414,000	\$ 118,808,000	\$ 116,746,000	\$ 90,485,000	\$ 49,992,000	\$ 17,642,000	\$ 1,688,000
Average Rate	\$ 2,3012	\$ 2,1361	\$ 2,1091	\$ 2,0859	\$ 2,0733	\$ 2,0372	\$ 2,0112	\$ 2,0146	\$ 2,0154	\$ 2,0130	\$ 2,0208	\$ 2,1837
<b>Gulf Coast</b>												
<b>Dth</b>												
Beginning Inventory	2,553,000	2,767,000	3,397,000	3,611,000	3,616,000	3,616,000	3,831,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000
Injections	214,000	629,000	214,000	5,000	-	-	222,000	-	-	-	-	-
Withdrawals	-	-	-	-	-	-	-	-	-	-	-	-
EndingBalance	2,767,000	3,397,000	3,611,000	3,616,000	3,616,000	3,616,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000
<b>\$</b>												
Beginning Inventory	\$ 6,696,000	\$ 7,239,000	\$ 8,814,000	\$ 9,353,000	\$ 9,366,000	\$ 9,366,000	\$ 9,902,000	\$ 10,457,000	\$ 10,457,000	\$ 10,457,000	\$ 10,457,000	\$ 10,457,000
Injections	\$ 543,000	\$ 1,576,000	\$ 538,000	\$ 13,000	\$ -	\$ 536,000	\$ 555,000	\$ -	\$ -	\$ -	\$ -	\$ 3,870,000
Withdrawals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
EndingBalance	\$ 7,239,000	\$ 8,814,000	\$ 9,353,000	\$ 9,366,000	\$ 9,366,000	\$ 9,366,000	\$ 10,457,000	\$ 10,457,000	\$ 10,457,000	\$ 10,457,000	\$ 10,457,000	\$ 6,587,000
Average Rate	\$ 2,6162	\$ 2,5946	\$ 2,5901	\$ 2,5902	\$ 2,5902	\$ 2,5847	\$ 2,5601	\$ 2,5801	\$ 2,5801	\$ 2,5801	\$ 2,5801	\$ 2,5801
<b>LNG</b>												
<b>Dth</b>												
Beginning Inventory	2,191,000	2,113,000	2,077,000	1,999,000	1,918,000	2,040,000	2,207,000	2,295,000	2,298,000	2,268,000	2,236,000	2,207,000
Injections	-	44,000	-	-	202,000	245,000	169,000	29,000	-	-	-	12,000
Withdrawals	78,000	80,000	78,000	80,000	80,000	78,000	80,000	26,000	30,000	32,000	29,000	27,000
EndingBalance	2,113,000	2,077,000	1,999,000	1,918,000	2,040,000	2,207,000	2,295,000	2,298,000	2,268,000	2,236,000	2,207,000	2,192,000
<b>\$</b>												
Beginning Inventory	\$ 4,671,000	\$ 4,504,000	\$ 4,418,000	\$ 4,252,000	\$ 4,081,000	\$ 4,293,000	\$ 4,555,000	\$ 4,681,000	\$ 4,686,000	\$ 4,624,000	\$ 4,559,000	\$ 4,501,000
Injections	\$ -	\$ 85,000	\$ -	\$ -	\$ 382,000	\$ 424,000	\$ 291,000	\$ 59,000	\$ -	\$ -	\$ -	\$ 27,000
Withdrawals	\$ 166,000	\$ 172,000	\$ 166,000	\$ 171,000	\$ 170,000	\$ 162,000	\$ 165,000	\$ 53,000	\$ 62,000	\$ 65,000	\$ 58,000	\$ 55,000
EndingBalance	\$ 4,504,000	\$ 4,418,000	\$ 4,252,000	\$ 4,081,000	\$ 4,293,000	\$ 4,555,000	\$ 4,681,000	\$ 4,686,000	\$ 4,624,000	\$ 4,559,000	\$ 4,501,000	\$ 4,472,000
Average Rate	\$ 2,1316	\$ 2,1271	\$ 2,1271	\$ 2,1277	\$ 2,1044	\$ 2,0639	\$ 2,0397	\$ 2,0392	\$ 2,0388	\$ 2,0389	\$ 2,0394	\$ 2,0401

KEDNY / KEDLI

Projected Gas Storage Inventory

Twelve Months Ended March 2022

Market Area	Forecast Apr-2021	Forecast May-2021	Forecast Jun-2021	Forecast Jul-2021	Forecast Aug-2021	Forecast Sep-2021	Forecast Oct-2021	Forecast Nov-2021	Forecast Dec-2021	Forecast Jan-2022	Forecast Feb-2022	Forecast Mar-2022
<b>Market Area</b>												
<b>Dth</b>												
Beginning Inventory	773,000	4,569,000	14,907,000	24,434,000	33,735,000	42,825,000	51,664,000	59,865,000	58,152,000	46,069,000	25,612,000	10,526,000
Injections	3,806,000	10,338,000	9,527,000	9,301,000	9,090,000	8,840,000	8,201,000	1,087,000	5,000	-	-	4,000
Withdrawals	10,000	-	-	-	-	-	-	2,800,000	12,098,000	20,447,000	15,086,000	9,533,000
EndingBalance	4,569,000	14,907,000	24,434,000	33,735,000	42,825,000	51,664,000	59,865,000	58,152,000	46,069,000	25,612,000	10,526,000	996,000
<b>\$</b>												
Beginning Inventory	\$ 1,688,000	\$ 9,737,000	\$ 29,920,000	\$ 48,529,000	\$ 66,074,000	\$ 83,229,000	\$ 98,406,000	\$ 113,167,000	\$ 110,059,000	\$ 87,307,000	\$ 48,556,000	\$ 20,122,000
Injections	\$ 8,069,000	\$ 20,183,000	\$ 18,609,000	\$ 17,545,000	\$ 17,155,000	\$ 15,177,000	\$ 14,761,000	\$ 2,177,000	\$ 11,000	\$ -	\$ -	\$ 9,000
Withdrawals	\$ 20,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,286,000	\$ 22,763,000	\$ 38,751,000	\$ 28,433,000	\$ 18,041,000
EndingBalance	\$ 9,737,000	\$ 29,920,000	\$ 48,529,000	\$ 66,074,000	\$ 83,229,000	\$ 98,406,000	\$ 113,167,000	\$ 110,059,000	\$ 87,307,000	\$ 48,556,000	\$ 20,122,000	\$ 2,090,000
Average Rate	\$ 2.1311	\$ 2.0071	\$ 1.9861	\$ 1.9586	\$ 1.9435	\$ 1.9047	\$ 1.8904	\$ 1.8926	\$ 1.8955	\$ 1.8958	\$ 1.9116	\$ 2.0984
<b>Gulf Coast</b>												
<b>Dth</b>												
Beginning Inventory	2,553,000	2,767,000	3,397,000	3,616,000	3,838,000	3,838,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000
Injections	214,000	629	220	222	-	214	-	-	-	-	-	1,500
Withdrawals	-	-	-	-	-	-	-	-	-	-	-	-
EndingBalance	2,767,000	3,397,000	3,616,000	3,838,000	3,838,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	2,553,000
<b>\$</b>												
Beginning Inventory	\$ 6,587,000	\$ 7,113,000	\$ 8,650,000	\$ 9,192,000	\$ 9,742,000	\$ 9,742,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000
Injections	\$ 526,000	\$ 1,537,000	\$ 542,000	\$ 550,000	\$ -	\$ 532,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Withdrawals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,802,000
EndingBalance	\$ 7,113,000	\$ 8,650,000	\$ 9,192,000	\$ 9,742,000	\$ 9,742,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000	\$ 10,274,000	\$ 6,472,000
Average Rate	\$ 2.5707	\$ 2.5464	\$ 2.5420	\$ 2.5383	\$ 2.5383	\$ 2.5349	\$ 2.5349	\$ 2.5349	\$ 2.5349	\$ 2.5349	\$ 2.5349	\$ 2.5351
<b>LNG</b>												
<b>Dth</b>												
Beginning Inventory	2,192,000	2,114,000	2,257,000	2,245,000	2,165,000	2,084,000	2,298,000	2,292,000	2,298,000	2,261,000	1,735,000	1,603,000
Injections	-	223,000	66,000	-	-	291,000	74,000	33,000	-	-	-	9,000
Withdrawals	78,000	80,000	78,000	80,000	80,000	78,000	80,000	26,000	37,000	526,000	132,000	38,000
EndingBalance	2,114,000	2,257,000	2,245,000	2,165,000	2,084,000	2,298,000	2,292,000	2,298,000	2,261,000	1,735,000	1,603,000	1,574,000
<b>\$</b>												
Beginning Inventory	\$ 4,472,000	\$ 4,314,000	\$ 4,554,000	\$ 4,517,000	\$ 4,356,000	\$ 4,195,000	\$ 4,502,000	\$ 4,468,000	\$ 4,477,000	\$ 4,406,000	\$ 3,356,000	\$ 3,093,000
Injections	\$ -	\$ 403,000	\$ 120,000	\$ -	\$ -	\$ 461,000	\$ 123,000	\$ 60,000	\$ -	\$ -	\$ -	\$ 18,000
Withdrawals	\$ 159,000	\$ 163,000	\$ 156,000	\$ 161,000	\$ 161,000	\$ 154,000	\$ 157,000	\$ 51,000	\$ 71,000	\$ 1,050,000	\$ 263,000	\$ 74,000
EndingBalance	\$ 4,314,000	\$ 4,554,000	\$ 4,517,000	\$ 4,356,000	\$ 4,195,000	\$ 4,502,000	\$ 4,468,000	\$ 4,477,000	\$ 4,406,000	\$ 3,356,000	\$ 3,093,000	\$ 3,038,000
Average Rate	\$ 2.0407	\$ 2.0177	\$ 2.0120	\$ 2.0120	\$ 2.0130	\$ 1.9591	\$ 1.9494	\$ 1.9482	\$ 1.9487	\$ 1.9343	\$ 1.9295	\$ 1.9301

KEDNY / KEDLI

Projected Gas Storage Inventory

Twelve Months Ended March 2023

Market Area	Forecast Apr-2022	Forecast May-2022	Forecast Jun-2022	Forecast Jul-2022	Forecast Aug-2022	Forecast Sep-2022	Forecast Oct-2022	Forecast Nov-2022	Forecast Dec-2022	Forecast Jan-2023	Forecast Feb-2023	Forecast Mar-2023
<b>Market Area</b>												
<b>Dth</b>												
Beginning Inventory	995,000	4,709,000	15,039,000	24,574,000	33,669,000	42,741,000	51,580,000	59,865,000	58,224,000	45,829,000	27,053,000	12,085,000
Injections	3,713,000	10,331,000	9,534,000	9,096,000	9,071,000	8,839,000	8,285,000	1,523,000	5,000	-	-	7,000
Withdrawals	-	-	-	-	-	-	-	3,164,000	12,400,000	18,776,000	14,969,000	9,601,000
EndingBalance	4,709,000	15,039,000	24,574,000	33,669,000	42,741,000	51,580,000	59,865,000	58,224,000	45,829,000	27,053,000	12,085,000	2,491,000
<b>\$</b>												
Beginning Inventory	\$ 2,090,000	\$ 9,930,000	\$ 30,099,000	\$ 48,563,000	\$ 65,476,000	\$ 82,341,000	\$ 97,102,000	\$ 111,711,000	\$ 108,887,000	\$ 85,792,000	\$ 50,713,000	\$ 22,874,000
Injections	\$ 7,840,000	\$ 20,169,000	\$ 18,465,000	\$ 16,913,000	\$ 16,864,000	\$ 14,762,000	\$ 14,608,000	\$ 3,031,000	\$ 11,000	\$ -	\$ -	\$ 17,000
Withdrawals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,854,000	\$ 23,106,000	\$ 35,079,000	\$ 27,839,000	\$ 17,949,000
EndingBalance	\$ 9,930,000	\$ 30,099,000	\$ 48,563,000	\$ 65,476,000	\$ 82,341,000	\$ 97,102,000	\$ 111,711,000	\$ 108,887,000	\$ 85,792,000	\$ 50,713,000	\$ 22,874,000	\$ 4,942,000
Average Rate	\$ 2.1087	\$ 2.0014	\$ 1.9762	\$ 1.9447	\$ 1.9265	\$ 1.8826	\$ 1.8660	\$ 1.8701	\$ 1.8720	\$ 1.8746	\$ 1.8928	\$ 1.9839
<b>Gulf Coast</b>												
<b>Dth</b>												
Beginning Inventory	2,553,000	2,767,000	3,397,000	3,611,000	3,833,000	3,833,000	4,047,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000
Injections	214,000	629,000	214,000	222,000	-	214,000	5,000	-	-	-	-	-
Withdrawals	-	-	-	-	-	-	-	-	-	-	-	-
EndingBalance	2,767,000	3,397,000	3,611,000	3,833,000	3,833,000	4,047,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000
<b>\$</b>												
Beginning Inventory	\$ 6,472,000	\$ 7,011,000	\$ 8,590,000	\$ 9,132,000	\$ 9,694,000	\$ 9,694,000	\$ 10,235,000	\$ 10,249,000	\$ 10,249,000	\$ 10,249,000	\$ 10,249,000	\$ 10,249,000
Injections	\$ 539,000	\$ 1,579,000	\$ 542,000	\$ 562,000	\$ -	\$ 541,000	\$ 13,000	\$ -	\$ -	\$ -	\$ -	\$ -
Withdrawals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,792,000
EndingBalance	\$ 7,011,000	\$ 8,590,000	\$ 9,132,000	\$ 9,694,000	\$ 9,694,000	\$ 10,235,000	\$ 10,249,000	\$ 10,249,000	\$ 10,249,000	\$ 10,249,000	\$ 10,249,000	\$ 6,456,000
Average Rate	\$ 2.5338	\$ 2.5287	\$ 2.5289	\$ 2.5291	\$ 2.5291	\$ 2.5291	\$ 2.5287	\$ 2.5287	\$ 2.5287	\$ 2.5287	\$ 2.5287	\$ 2.5288
<b>LNG</b>												
<b>Dth</b>												
Beginning Inventory	1,574,000	1,509,000	1,664,000	1,665,000	1,597,000	1,530,000	1,680,000	1,680,000	1,680,000	1,653,000	1,626,000	1,601,000
Injections	-	223,000	66,000	-	-	216,000	68,000	26,000	-	-	-	-
Withdrawals	66,000	68,000	66,000	68,000	68,000	66,000	68,000	26,000	27,000	27,000	24,000	27,000
EndingBalance	1,509,000	1,664,000	1,665,000	1,597,000	1,530,000	1,680,000	1,680,000	1,680,000	1,653,000	1,626,000	1,601,000	1,574,000
<b>\$</b>												
Beginning Inventory	\$ 3,038,000	\$ 2,912,000	\$ 3,183,000	\$ 3,177,000	\$ 3,048,000	\$ 2,919,000	\$ 3,127,000	\$ 3,112,000	\$ 3,111,000	\$ 3,061,000	\$ 3,011,000	\$ 2,966,000
Injections	\$ -	\$ 401,000	\$ 120,000	\$ -	\$ -	\$ 332,000	\$ 110,000	\$ 48,000	\$ -	\$ -	\$ -	\$ -
Withdrawals	\$ 126,000	\$ 130,000	\$ 125,000	\$ 129,000	\$ 129,000	\$ 123,000	\$ 126,000	\$ 49,000	\$ 50,000	\$ 50,000	\$ 45,000	\$ 50,000
EndingBalance	\$ 2,912,000	\$ 3,183,000	\$ 3,177,000	\$ 3,048,000	\$ 2,919,000	\$ 3,127,000	\$ 3,112,000	\$ 3,111,000	\$ 3,061,000	\$ 3,011,000	\$ 2,966,000	\$ 2,915,000
Average Rate	\$ 1.9298	\$ 1.9129	\$ 1.9081	\$ 1.9086	\$ 1.9078	\$ 1.8613	\$ 1.8524	\$ 1.8518	\$ 1.8518	\$ 1.8518	\$ 1.8526	\$ 1.8520



KEDNY / KEDLI

Projected Gas Storage Inventory

Twelve Months Ended March 2024

Market Area	Forecast Apr-2023	Forecast May-2023	Forecast Jun-2023	Forecast Jul-2023	Forecast Aug-2023	Forecast Sep-2023	Forecast Oct-2023	Forecast Nov-2023	Forecast Dec-2023	Forecast Jan-2024	Forecast Feb-2024	Forecast Mar-2024
<b>Market Area</b>												
<b>Dth</b>												
Beginning Inventory	2,491,000	4,981,000	15,181,000	24,701,000	34,082,000	43,027,000	51,866,000	59,893,000	58,224,000	45,579,000	26,924,000	11,481,000
Injections	2,617,000	10,200,000	9,520,000	9,381,000	8,945,000	8,839,000	8,026,000	1,483,000	5,000	-	-	9,000
Withdrawals	127,000	-	-	-	-	-	-	3,151,000	12,650,000	18,665,000	15,443,000	9,366,000
EndingBalance	4,981,000	15,181,000	24,701,000	34,082,000	43,027,000	51,866,000	59,893,000	58,224,000	45,579,000	26,924,000	11,481,000	2,123,000
<b>\$</b>												
Beginning Inventory	\$ 4,942,000	\$ 10,352,000	\$ 30,893,000	\$ 50,066,000	\$ 68,252,000	\$ 85,553,000	\$ 101,113,000	\$ 116,051,000	\$ 113,056,000	\$ 88,570,000	\$ 52,389,000	\$ 22,506,000
Injections	\$ 5,650,000	\$ 20,541,000	\$ 19,172,000	\$ 18,187,000	\$ 17,301,000	\$ 15,560,000	\$ 14,938,000	\$ 3,095,000	\$ 11,000	\$ -	\$ 1,000	\$ 21,000
Withdrawals	\$ 240,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,089,000	\$ 24,498,000	\$ 36,181,000	\$ 29,884,000	\$ 18,183,000
EndingBalance	\$ 10,352,000	\$ 30,893,000	\$ 50,066,000	\$ 68,252,000	\$ 85,553,000	\$ 101,113,000	\$ 116,051,000	\$ 113,056,000	\$ 88,570,000	\$ 52,389,000	\$ 22,506,000	\$ 4,344,000
Average Rate	\$ 2.0783	\$ 2.0350	\$ 2.0269	\$ 2.0026	\$ 1.9884	\$ 1.9495	\$ 1.9376	\$ 1.9417	\$ 1.9432	\$ 1.9458	\$ 1.9603	\$ 2.0462
<b>Gulf Coast</b>												
<b>Dth</b>												
Beginning Inventory	2,553,000	2,987,000	3,616,000	3,831,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000
Injections	434,000	629,000	214,000	222,000	-	-	-	-	-	-	-	-
Withdrawals	-	-	-	-	-	-	-	-	-	-	-	-
EndingBalance	2,987,000	3,616,000	3,831,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000	4,053,000
<b>\$</b>												
Beginning Inventory	\$ 6,456,000	\$ 7,575,000	\$ 9,188,000	\$ 9,743,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000
Injections	\$ 1,119,000	\$ 1,614,000	\$ 554,000	\$ 577,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Withdrawals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
EndingBalance	\$ 7,575,000	\$ 9,188,000	\$ 9,743,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000	\$ 10,319,000
Average Rate	\$ 2.5360	\$ 2.5409	\$ 2.5432	\$ 2.5460	\$ 2.5460	\$ 2.5460	\$ 2.5460	\$ 2.5460	\$ 2.5460	\$ 2.5460	\$ 2.5460	\$ 2.5464
<b>LNG</b>												
<b>Dth</b>												
Beginning Inventory	1,574,000	1,609,000	1,947,000	1,983,000	1,932,000	1,956,000	2,284,000	2,296,000	2,298,000	2,261,000	1,282,000	1,248,000
Injections	112,000	419,000	114,000	30,000	105,000	405,000	93,000	37,000	-	-	-	-
Withdrawals	78,000	80,000	78,000	80,000	80,000	78,000	80,000	35,000	37,000	979,000	34,000	37,000
EndingBalance	1,609,000	1,947,000	1,983,000	1,932,000	1,956,000	2,284,000	2,296,000	2,298,000	2,261,000	1,282,000	1,248,000	1,211,000
<b>\$</b>												
Beginning Inventory	\$ 2,915,000	\$ 2,988,000	\$ 3,618,000	\$ 3,687,000	\$ 3,592,000	\$ 3,631,000	\$ 4,146,000	\$ 4,160,000	\$ 4,167,000	\$ 4,100,000	\$ 2,316,000	\$ 2,254,000
Injections	\$ 218,000	\$ 780,000	\$ 213,000	\$ 54,000	\$ 188,000	\$ 659,000	\$ 160,000	\$ 71,000	\$ -	\$ -	\$ -	\$ -
Withdrawals	\$ 145,000	\$ 150,000	\$ 145,000	\$ 150,000	\$ 149,000	\$ 143,000	\$ 146,000	\$ 64,000	\$ 66,000	\$ 1,784,000	\$ 62,000	\$ 66,000
EndingBalance	\$ 2,988,000	\$ 3,618,000	\$ 3,687,000	\$ 3,592,000	\$ 3,631,000	\$ 4,146,000	\$ 4,160,000	\$ 4,167,000	\$ 4,100,000	\$ 2,316,000	\$ 2,254,000	\$ 2,188,000
Average Rate	\$ 1.8571	\$ 1.8562	\$ 1.8593	\$ 1.8592	\$ 1.8563	\$ 1.8152	\$ 1.8118	\$ 1.8133	\$ 1.8134	\$ 1.8066	\$ 1.8061	\$ 1.8068

Exhibit \_\_ (EDA-5)

KEDNY/KEDLI Purchased Gas Expense for the Twelve Months Ending (“TME”) December 31,  
2018

KEDNY / KEDLI

Purchased Gas Expense

Twelve Months Ended December 31, 2018  
(in thousands of dollars)

	Jan-2018	Feb-2018	Mar-2018	Apr-2018	May-2018	Jun-2018	Jul-2018	Aug-2018	Sep-2018	Oct-2018	Nov-2018	Dec-2018	Total TME Dec 2018
Purchased Take - MDT	24,980	17,311	21,351	25,275	17,826	16,183	15,612	13,653	13,638	17,928	20,258	22,167	226,182
Variable Cost	\$ 203,709	\$ 44,560	\$ 53,070	\$ 61,885	\$ 40,489	\$ 34,271	\$ 37,410	\$ 33,504	\$ 33,954	\$ 48,570	\$ 76,985	\$ 90,950	\$ 759,356
Fixed Costs	\$ 32,678	\$ 31,101	\$ 30,673	\$ 28,748	\$ 30,099	\$ 29,084	\$ 31,506	\$ 30,246	\$ 29,381	\$ 27,481	\$ 27,826	\$ 32,004	\$ 360,825
Total Invoice Cost	\$ 236,386	\$ 75,661	\$ 83,742	\$ 90,632	\$ 70,588	\$ 63,354	\$ 68,916	\$ 63,750	\$ 63,335	\$ 76,050	\$ 104,811	\$ 122,954	\$ 1,120,181
Minus Injections to Storage & LNG	\$ (451)	\$ (4,501)	\$ (8,445)	\$ (18,417)	\$ (26,344)	\$ (22,642)	\$ (24,864)	\$ (22,190)	\$ (22,191)	\$ (20,179)	\$ (6,386)	\$ (1,410)	\$ (178,121)
Plus Withdrawals from Storage & LNG	\$ 38,713	\$ 31,666	\$ 32,461	\$ 3,270	\$ 481	\$ 146	\$ 4,147	\$ 986	\$ 688	\$ 9,177	\$ 22,118	\$ 24,897	\$ 168,751
Total Purchased Gas Expense	\$ 274,649	\$ 102,826	\$ 107,758	\$ 75,485	\$ 44,725	\$ 40,859	\$ 48,099	\$ 42,547	\$ 41,832	\$ 65,048	\$ 120,543	\$ 146,441	\$ 1,110,811
WACOG per Dth													
Utilized Variable Gas Cost	\$ 8.15	\$ 2.57	\$ 2.49	\$ 2.45	\$ 2.27	\$ 2.12	\$ 2.40	\$ 2.45	\$ 2.49	\$ 2.71	\$ 3.80	\$ 4.10	
Underground Storage "In Ground" WACOG	\$ 2.00	\$ 2.00	\$ 2.01	\$ 2.12	\$ 2.17	\$ 2.14	\$ 2.20	\$ 2.25	\$ 2.29	\$ 2.35	\$ 2.36	\$ 2.36	
LNG WACOG	\$ 2.03	\$ 2.03	\$ 2.03	\$ 2.04	\$ 2.06	\$ 2.06	\$ 2.06	\$ 2.06	\$ 2.07	\$ 2.12	\$ 2.13	\$ 2.13	

Note: No hedging costs/credits included.

Exhibit \_\_ (EDA-6)

KEDNY/KEDLI Forecast of Variable Gas Expense for the TME March 31, 2021, 2022, 2023  
and 2024

KEDNY / KEDLI

Forecast of Variable Gas Expense

Twelve Months Ended March 2021  
(in thousands of dollars)

	Apr-2020	May-2020	Jun-2020	Jul-2020	Aug-2020	Sep-2020	Oct-2020	Nov-2020	Dec-2020	Jan-2021	Feb-2021	Mar-2021	Total TME Mar 2021
Purchased "Wellhead" Volume - MDT	22,138	20,891	17,425	16,325	16,695	18,044	22,373	23,818	32,454	37,565	32,212	28,126	288,066
Delivered Volume - MDT	21,859	20,557	17,096	15,988	16,367	17,705	22,009	23,467	31,912	36,913	31,743	27,735	283,351
HH NYMEX (8/27/15)	\$ 2.56	\$ 2.50	\$ 2.53	\$ 2.57	\$ 2.57	\$ 2.55	\$ 2.57	\$ 2.62	\$ 2.80	\$ 2.92	\$ 2.86	\$ 2.71	
Total "Wellhead" Cost of Purchased Gas	\$ 43,074	\$ 37,602	\$ 30,822	\$ 27,819	\$ 28,782	\$ 28,898	\$ 37,538	\$ 41,715	\$ 42,217	\$ 42,608	\$ 37,035	\$ 38,614	\$ 436,525
Total Pipeline Variable Cost	\$ 4,881	\$ 4,743	\$ 4,578	\$ 4,395	\$ 4,148	\$ 4,292	\$ 4,008	\$ 4,494	\$ 5,368	\$ 5,961	\$ 5,182	\$ 5,065	\$ 57,114
Total Variable Cost	\$ 47,955	\$ 42,345	\$ 35,200	\$ 32,214	\$ 32,930	\$ 33,190	\$ 41,546	\$ 46,209	\$ 47,585	\$ 48,569	\$ 42,217	\$ 43,679	\$ 493,639
"Wellhead" WACOG per Dth	\$ 1.95	\$ 1.80	\$ 1.76	\$ 1.70	\$ 1.72	\$ 1.60	\$ 1.68	\$ 1.75	\$ 1.30	\$ 1.13	\$ 1.15	\$ 1.37	
Delivered Unit Cost of Total Flowing Supply Purchases	\$ 2.19	\$ 2.06	\$ 2.06	\$ 2.01	\$ 2.01	\$ 1.87	\$ 1.89	\$ 1.97	\$ 1.49	\$ 1.32	\$ 1.33	\$ 1.57	

Twelve Months Ended March 2022  
(in thousands of dollars)

	Apr-2021	May-2021	Jun-2021	Jul-2021	Aug-2021	Sep-2021	Oct-2021	Nov-2021	Dec-2021	Jan-2022	Feb-2022	Mar-2022	Total TME Mar 2022
Purchased "Wellhead" Volume - MDT	21,735	21,853	17,580	16,633	16,298	17,909	22,129	23,256	33,161	36,376	32,919	28,693	290,543
Delivered Volume - MDT	21,454	21,492	17,270	16,291	15,972	17,572	21,770	22,916	32,590	37,715	32,427	28,314	285,784
HH NYMEX (8/27/15)	\$ 2.47	\$ 2.44	\$ 2.47	\$ 2.51	\$ 2.53	\$ 2.52	\$ 2.55	\$ 2.61	\$ 2.79	\$ 2.91	\$ 2.86	\$ 2.76	
Total "Wellhead" Cost of Purchased Gas	\$ 39,849	\$ 36,629	\$ 29,084	\$ 26,202	\$ 26,029	\$ 26,728	\$ 35,713	\$ 37,012	\$ 44,156	\$ 41,058	\$ 40,203	\$ 36,469	\$ 419,130
Total Pipeline Variable Cost	\$ 4,831	\$ 4,633	\$ 4,372	\$ 4,311	\$ 3,831	\$ 3,449	\$ 3,838	\$ 4,316	\$ 5,196	\$ 5,790	\$ 5,044	\$ 5,027	\$ 54,640
Total Variable Cost	\$ 44,680	\$ 41,262	\$ 33,456	\$ 30,513	\$ 29,860	\$ 30,177	\$ 39,551	\$ 41,328	\$ 49,352	\$ 46,848	\$ 45,247	\$ 41,496	\$ 473,770
"Wellhead" WACOG per Dth	\$ 1.83	\$ 1.68	\$ 1.65	\$ 1.58	\$ 1.60	\$ 1.49	\$ 1.61	\$ 1.59	\$ 1.33	\$ 1.07	\$ 1.22	\$ 1.27	
Delivered Unit Cost of Total Flowing Supply Purchases	\$ 2.08	\$ 1.92	\$ 1.94	\$ 1.87	\$ 1.87	\$ 1.72	\$ 1.82	\$ 1.80	\$ 1.51	\$ 1.24	\$ 1.40	\$ 1.47	

KEDNY / KEDLI

Forecast of Variable Gas Expense

Twelve Months Ended March 2023  
(in thousands of dollars)

	Apr-2022	May-2022	Jun-2022	Jul-2022	Aug-2022	Sep-2022	Oct-2022	Nov-2022	Dec-2022	Jan-2023	Feb-2023	Mar-2023	Total TWME Mar 2023
Purchased "Wellhead" Volume - MDT	21,949	22,010	17,720	16,532	16,386	18,014	22,481	24,142	33,864	39,169	33,603	29,262	295,132
Delivered Volume - MDT	21,711	21,652	17,410	16,210	16,078	17,679	22,126	23,793	33,263	38,510	33,107	28,888	290,427
HH NYMEX (8/27/15)	\$ 2.62	\$ 2.50	\$ 2.53	\$ 2.56	\$ 2.57	\$ 2.56	\$ 2.59	\$ 2.65	\$ 2.81	\$ 2.92	\$ 2.87	\$ 2.78	
Total "Wellhead" Cost of Purchased Gas	\$ 39,954	\$ 36,806	\$ 28,915	\$ 25,974	\$ 25,798	\$ 26,115	\$ 35,536	\$ 38,424	\$ 45,943	\$ 48,893	\$ 41,863	\$ 36,703	\$ 430,723
Total Pipeline Variable Cost	\$ 4,670	\$ 4,622	\$ 4,345	\$ 3,903	\$ 3,718	\$ 3,390	\$ 3,734	\$ 4,343	\$ 5,151	\$ 5,696	\$ 4,984	\$ 4,981	\$ 53,538
Total Variable Cost	\$ 44,624	\$ 41,228	\$ 33,260	\$ 29,877	\$ 29,516	\$ 29,505	\$ 39,270	\$ 42,767	\$ 51,094	\$ 54,589	\$ 46,847	\$ 41,684	\$ 484,261
"Wellhead" WACOG per Dth	\$ 1.82	\$ 1.66	\$ 1.63	\$ 1.57	\$ 1.57	\$ 1.45	\$ 1.58	\$ 1.59	\$ 1.36	\$ 1.25	\$ 1.25	\$ 1.25	
Delivered Unit Cost of Total Flowing Supply Purchases	\$ 2.06	\$ 1.90	\$ 1.91	\$ 1.84	\$ 1.84	\$ 1.67	\$ 1.77	\$ 1.80	\$ 1.54	\$ 1.42	\$ 1.42	\$ 1.44	

Twelve Months Ended March 2024  
(in thousands of dollars)

	Apr-2023	May-2023	Jun-2023	Jul-2023	Aug-2023	Sep-2023	Oct-2023	Nov-2023	Dec-2023	Jan-2024	Feb-2024	Mar-2024	Total TWME Mar 2024
Purchased "Wellhead" Volume - MDT	21,638	22,491	17,916	17,000	16,514	17,981	22,561	24,640	34,670	40,128	36,802	29,942	307,283
Delivered Volume - MDT	21,361	22,133	17,605	16,672	16,206	17,649	22,208	24,291	34,064	39,443	35,263	29,572	296,456
HH NYMEX (8/27/15)	\$ 2.56	\$ 2.55	\$ 2.59	\$ 2.63	\$ 2.65	\$ 2.65	\$ 2.68	\$ 2.75	\$ 2.90	\$ 3.01	\$ 2.97	\$ 2.89	
Total "Wellhead" Cost of Purchased Gas	\$ 40,235	\$ 38,691	\$ 30,436	\$ 27,939	\$ 27,059	\$ 27,298	\$ 37,571	\$ 41,462	\$ 49,319	\$ 49,536	\$ 48,811	\$ 40,967	\$ 459,324
Total Pipeline Variable Cost	\$ 4,943	\$ 4,814	\$ 4,543	\$ 4,178	\$ 3,853	\$ 3,548	\$ 3,902	\$ 4,518	\$ 5,349	\$ 5,885	\$ 5,371	\$ 5,184	\$ 56,088
Total Variable Cost	\$ 45,178	\$ 43,505	\$ 34,979	\$ 32,117	\$ 30,912	\$ 30,846	\$ 41,473	\$ 45,980	\$ 54,668	\$ 55,421	\$ 54,182	\$ 46,150	\$ 515,411
"Wellhead" WACOG per Dth	\$ 1.86	\$ 1.72	\$ 1.70	\$ 1.64	\$ 1.64	\$ 1.52	\$ 1.67	\$ 1.68	\$ 1.42	\$ 1.23	\$ 1.36	\$ 1.37	
Delivered Unit Cost of Total Flowing Supply Purchases	\$ 2.11	\$ 1.97	\$ 1.99	\$ 1.93	\$ 1.91	\$ 1.75	\$ 1.87	\$ 1.89	\$ 1.61	\$ 1.41	\$ 1.54	\$ 1.56	

Exhibit \_\_ (EDA-7)

KEDNY/KEDLI Forecast of Purchased Gas Expense for the TME March 31, 2021, 2022, 2023  
and 2024

KEDNY / KEDLI

Forecast of Purchased Gas Expense

Twelve Months Ended March 2021

(in thousands of dollars)

	Apr-2020	May-2020	Jun-2020	Jul-2020	Aug-2020	Sep-2020	Oct-2020	Nov-2020	Dec-2020	Jan-2021	Feb-2021	Mar-2021	Total TIME Mar-2021
<b>Delivered Volume - MDT</b>	21,859	20,557	17,096	15,988	16,367	17,705	22,009	23,467	31,912	36,913	31,743	27,735	283,351
Variable Cost	\$ 47,855	\$ 42,345	\$ 35,200	\$ 32,214	\$ 32,930	\$ 33,190	\$ 41,546	\$ 46,209	\$ 47,585	\$ 48,569	\$ 42,217	\$ 43,679	\$ 493,639
Fixed Costs	\$ 36,746	\$ 37,476	\$ 36,746	\$ 37,476	\$ 37,476	\$ 36,746	\$ 37,476	\$ 37,475	\$ 57,716	\$ 57,716	\$ 53,911	\$ 54,577	\$ 521,534
Total Invoice Cost	\$ 84,701	\$ 79,821	\$ 71,946	\$ 69,690	\$ 70,406	\$ 69,936	\$ 79,022	\$ 83,684	\$ 105,301	\$ 106,285	\$ 96,128	\$ 98,256	\$ 1,015,173
Minus Injections to Storage	\$ (8,715)	\$ (21,888)	\$ (20,158)	\$ (18,764)	\$ (19,297)	\$ (17,968)	\$ (16,241)	\$ (3,271)	\$ (12)	\$ -	\$ -	\$ (40)	\$ (126,354)
Plus Withdrawals from Storage	\$ 1,137	\$ 172	\$ 166	\$ 171	\$ 170	\$ 162	\$ 165	\$ 5,328	\$ 26,335	\$ 40,558	\$ 32,408	\$ 19,892	\$ 126,864
Total Purchased Gas Expense	\$ 77,123	\$ 58,105	\$ 51,954	\$ 51,097	\$ 51,279	\$ 52,130	\$ 62,946	\$ 85,741	\$ 131,624	\$ 146,843	\$ 128,536	\$ 118,108	\$ 1,015,483
<b>WACOG per Dth</b>													
Delivered Unit Cost of Total Flowing Supply Purchases	\$ 2.19	\$ 2.06	\$ 2.06	\$ 2.01	\$ 2.01	\$ 1.87	\$ 1.89	\$ 1.97	\$ 1.49	\$ 1.32	\$ 1.33	\$ 1.57	\$ 1.57
Underground Storage "In Ground" WACOG	\$ 2.43	\$ 2.23	\$ 2.17	\$ 2.14	\$ 2.11	\$ 2.08	\$ 2.05	\$ 2.05	\$ 2.06	\$ 2.09	\$ 2.20	\$ 2.49	\$ 2.49
LNG WACOG	\$ 2.13	\$ 2.13	\$ 2.13	\$ 2.13	\$ 2.10	\$ 2.06	\$ 2.04	\$ 2.04	\$ 2.04	\$ 2.04	\$ 2.04	\$ 2.04	\$ 2.04

Twelve Months Ended March 2022

(in thousands of dollars)

	Apr-2021	May-2021	Jun-2021	Jul-2021	Aug-2021	Sep-2021	Oct-2021	Nov-2021	Dec-2021	Jan-2022	Feb-2022	Mar-2022	Total TIME Mar-2022
<b>Delivered Volume - MDT</b>	21,454	21,492	17,270	16,291	15,972	17,572	21,770	22,916	32,590	37,715	32,427	28,314	285,784
Variable Cost	\$ 44,680	\$ 41,262	\$ 33,456	\$ 30,513	\$ 29,860	\$ 30,177	\$ 39,551	\$ 41,328	\$ 49,352	\$ 46,848	\$ 45,247	\$ 41,496	\$ 473,770
Fixed Costs	\$ 52,586	\$ 53,844	\$ 52,586	\$ 53,844	\$ 53,844	\$ 52,586	\$ 53,844	\$ 53,083	\$ 54,532	\$ 54,532	\$ 50,727	\$ 54,345	\$ 640,349
Total Invoice Cost	\$ 97,266	\$ 95,106	\$ 86,042	\$ 84,357	\$ 83,704	\$ 82,763	\$ 93,395	\$ 94,411	\$ 103,884	\$ 101,380	\$ 95,974	\$ 95,841	\$ 1,114,119
Minus Injections to Storage	\$ (8,595)	\$ (21,943)	\$ (19,217)	\$ (18,095)	\$ (17,155)	\$ (16,000)	\$ (14,835)	\$ (2,210)	\$ (11)	\$ -	\$ -	\$ (18)	\$ (118,079)
Plus Withdrawals from Storage	\$ 20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,286	\$ 22,763	\$ 38,751	\$ 28,433	\$ 21,845	\$ 117,098
Total Purchased Gas Expense	\$ 88,691	\$ 73,163	\$ 66,825	\$ 66,262	\$ 66,549	\$ 66,763	\$ 78,560	\$ 97,487	\$ 126,636	\$ 140,131	\$ 124,407	\$ 117,667	\$ 1,113,138
<b>WACOG per Dth</b>													
Delivered Unit Cost of Total Flowing Supply Purchases	\$ 2.08	\$ 1.92	\$ 1.94	\$ 1.87	\$ 1.87	\$ 1.72	\$ 1.82	\$ 1.80	\$ 1.51	\$ 1.24	\$ 1.40	\$ 1.47	\$ 1.47
Underground Storage "In Ground" WACOG	\$ 2.30	\$ 2.11	\$ 2.06	\$ 2.02	\$ 1.99	\$ 1.95	\$ 1.93	\$ 1.93	\$ 1.93	\$ 1.95	\$ 2.08	\$ 2.41	\$ 2.41
LNG WACOG	\$ 2.04	\$ 2.02	\$ 2.01	\$ 2.01	\$ 2.01	\$ 1.96	\$ 1.95	\$ 1.95	\$ 1.95	\$ 1.93	\$ 1.93	\$ 1.93	\$ 1.93





Exhibit \_\_ (EDA-8)

KEDNY & KEDLI Estimated Marginal Commodity Cost of Gas

**KEDNY**  
**Estimated Marginal Commodity Cost of Gas**  
**For Period: November 1, 2020 through March 31, 2021**  
**( \$ / dt )**

<u>Nov-16</u>	<u>Dec-16</u>	<u>Jan-17</u>	<u>Feb-17</u>	<u>Mar-17</u>	Winter (Nov-Mar) <u>Average</u>
\$ 2.67	\$ 3.37	\$ 5.64	\$ 5.54	\$ 2.86	\$ 4.02

**KEDLI**  
**Estimated Marginal Commodity Cost of Gas**  
**For Period: November 1, 2020 through March 31, 2021**  
**( \$ / dt )**

<u>Nov-16</u>	<u>Dec-16</u>	<u>Jan-17</u>	<u>Feb-17</u>	<u>Mar-17</u>	<b>Winter (Nov-Mar) Average</b>
\$ 2.67	\$ 3.37	\$ 5.64	\$ 5.54	\$ 2.86	\$ 4.02

Exhibit \_\_ (EDA-9)

KEDNY & KEDLI Estimated Annualized Marginal Capacity Cost of Gas

**KEDNY**  
**Estimated Annualized Marginal Capacity Cost of Gas**  
**For Period: November 1, 2020 through March 31, 2021**  
Units (\$ per dt)

<b>Marginal Supplies</b>	<b>Peak Day Quantity dt/day</b>	<b>Cost \$</b>	<b>Annual Capacity Costs Quantity dt</b>	<b>Unitized \$/dt</b>	<b>Peak Day Capacity Costs \$/dt</b>
Transco NESE Project	400,000	\$ 176,880,000	134,000,000	\$1.32	\$442.20
15 Day City Gate Peaking Supplies	160,468	\$ 8,856,378	2,407,020	\$3.68	\$55.19
<b>Grand Total</b>	<b>560,468</b>	<b>185,736,378</b>	<b>136,407,020</b>	<b>\$1.36</b>	<b>\$331.40</b>
<hr/> <b>Annualized Marginal Capacity Cost of Gas</b> <hr/>					
Peak Day Capacity Cost				\$331.40 per dt	
Ratio: Peak Day Requirements to Annual Normalized Firm Sales				1 to 72 dt	
Annual Marginal Capacity Cost				\$4.48 per dt	

**KEDLI**  
**Estimated Annualized Marginal Capacity Cost of Gas**  
**For Period: November 1, 2016 through March 31, 2017**  
Units (\$ per dt)

<b>Marginal Supplies</b>	<b>Peak Day Quantity dt/day</b>	<b>Annual Capacity Costs Cost \$</b>	<b>Annual Capacity Costs Quantity dt</b>	<b>Unitized \$/dt</b>	<b>Peak Day Capacity Costs \$/dt</b>
DTI New Market Project	400,000	\$ 176,880,000	146,000,000	\$1.21	\$442.20
15 Day City Gate Peaking Supplies	160,468	\$ 8,856,378	2,407,020	\$3.68	\$55.19
<b>Grand Total</b>	<b>560,468</b>	<b>185,736,378</b>	<b>148,407,020</b>	<b>\$1.25</b>	<b>\$331.40</b>
<hr/>					
<b>Annualized Marginal Capacity Cost of Gas</b>					
Peak Day Capacity Cost		\$331.40 per dt			
Ratio: Peak Day Requirements to Annual Normalized Firm Sales		1 to 72 dt			
Annual Marginal Capacity Cost		\$4.48 per dt			

Exhibit \_\_ (EDA-10)

KEDNY & KEDLI Non-Migration Capacity Release Revenues



KEDNY & KEDLI Non-Migration Capacity Release Revenues

KEDNY

	<b>Total Margin</b>	<b>Customer Share</b>	<b>Nat Grid Share</b>
Apr 14-Mar 15	\$4,392,667	\$3,733,767	\$658,900
Apr 15-Mar 16	\$5,278,667	\$4,486,867	\$791,800
Apr 16-Mar 17	\$4,898,667	\$4,163,867	\$734,800
Apr 17-Mar 18	\$3,538,000	\$3,007,300	\$530,700
Apr 18-Jan 19	\$4,380,000	\$3,723,000	\$657,000
<b>Total:</b>	<b>\$22,488,000</b>	<b>\$19,114,800</b>	<b>\$3,373,200</b>

KEDLI

	<b>Total Margin</b>	<b>Customer Share</b>	<b>Nat Grid Share</b>
Apr 14-Mar 15	\$3,148,667	\$2,676,367	\$472,300
Apr 15-Mar 16	\$3,318,000	\$2,820,300	\$497,700
Apr 16-Mar 17	\$3,304,000	\$2,808,400	\$495,600
Apr 17-Mar 18	\$2,364,000	\$2,009,400	\$354,600
Apr 18-Jan 19	\$2,891,333	\$2,457,633	\$433,700
<b>Total:</b>	<b>\$15,026,000</b>	<b>\$12,772,100</b>	<b>\$2,253,900</b>

Exhibit \_\_ (EDA-11)

KEDNY & KEDLI Off-System Sales (“OSS”) Transaction Revenues

## KEDNY & KEDLI OSS Transaction Revenues

Exhibit\_(EDA-11)  
Page 1 of 1

### KEDNY

		Total Margin	Customer Share	Nat Grid Share
Apr 14-Mar 15	OSS Sales	\$14,983,333	\$12,735,833	\$2,247,500
	Capacity Release	\$4,392,667	\$3,733,767	\$658,900
	AMA's	<u>\$14,934,667</u>	<u>\$12,694,467</u>	<u>\$2,240,200</u>
	<b>Total</b>	<b>\$34,310,667</b>	<b>\$29,164,067</b>	<b>\$5,146,600</b>
Apr 15-Mar 16	OSS Sales	\$28,524,000	\$24,245,400	\$4,278,600
	Capacity Release	\$5,278,667	\$4,486,867	\$791,800
	AMA's	<u>\$13,758,000</u>	<u>\$11,694,300</u>	<u>\$2,063,700</u>
	<b>Total</b>	<b>\$47,560,667</b>	<b>\$40,426,567</b>	<b>\$7,134,100</b>
Apr 16-Mar 17	OSS Sales	\$14,092,000	\$11,978,200	\$2,113,800
	Capacity Release	\$4,898,667	\$4,163,867	\$734,800
	AMA's	<u>\$11,064,000</u>	<u>\$9,404,400</u>	<u>\$1,659,600</u>
	<b>Total</b>	<b>\$30,054,667</b>	<b>\$25,546,467</b>	<b>\$4,508,200</b>
Apr 17-Mar 18	OSS Sales	\$20,882,000	\$17,749,700	\$3,132,300
	Capacity Release	\$3,538,000	\$3,007,300	\$530,700
	AMA's	<u>\$9,731,333</u>	<u>\$8,271,633</u>	<u>\$1,459,700</u>
	<b>Total</b>	<b>\$34,151,333</b>	<b>\$29,028,633</b>	<b>\$5,122,700</b>
Apr 18-Jan 19	OSS Sales	\$13,009,333	\$11,057,933	\$1,951,400
	Capacity Release	\$4,380,000	\$3,723,000	\$657,000
	AMA's	<u>\$7,186,667</u>	<u>\$6,108,667</u>	<u>\$1,078,000</u>
	<b>Total</b>	<b>\$24,576,000</b>	<b>\$20,889,600</b>	<b>\$3,686,400</b>
<b>Grand Total:</b>		<b>\$170,653,333</b>	<b>\$145,055,333</b>	<b>\$25,598,000</b>

### KEDLI

		Total Margin	Customer Share	Nat Grid Share
Apr 14-Mar 15	OSS Sales	\$9,972,667	\$8,476,767	\$1,495,900
	Capacity Release	\$3,148,667	\$2,676,367	\$472,300
	AMA's	<u>\$10,210,000</u>	<u>\$8,678,500</u>	<u>\$1,531,500</u>
	<b>Total</b>	<b>\$23,331,333</b>	<b>\$19,831,633</b>	<b>\$3,499,700</b>
Apr 15-Mar 16	OSS Sales	\$17,931,333	\$15,241,633	\$2,689,700
	Capacity Release	\$3,318,000	\$2,820,300	\$497,700
	AMA's	<u>\$8,648,667</u>	<u>\$7,351,367</u>	<u>\$1,297,300</u>
	<b>Total</b>	<b>\$29,898,000</b>	<b>\$25,413,300</b>	<b>\$4,484,700</b>
Apr 16-Mar 17	OSS Sales	\$9,426,667	\$8,012,667	\$1,414,000
	Capacity Release	\$3,304,000	\$2,808,400	\$495,600
	AMA's	<u>\$7,487,333</u>	<u>\$6,364,233</u>	<u>\$1,123,100</u>
	<b>Total</b>	<b>\$20,218,000</b>	<b>\$17,185,300</b>	<b>\$3,032,700</b>
Apr 17-Mar 18	OSS Sales	\$14,121,333	\$12,003,133	\$2,118,200
	Capacity Release	\$2,364,000	\$2,009,400	\$354,600
	AMA's	<u>\$7,402,933</u>	<u>\$6,437,333</u>	<u>\$965,600</u>
	<b>Total</b>	<b>\$23,888,267</b>	<b>\$20,449,867</b>	<b>\$3,438,400</b>
Apr 18-Jan 19	OSS Sales	\$8,532,000	\$7,252,200	\$1,279,800
	Capacity Release	\$2,891,333	\$2,457,633	\$433,700
	AMA's	<u>\$4,755,333</u>	<u>\$4,042,033</u>	<u>\$713,300</u>
	<b>Total</b>	<b>\$16,178,667</b>	<b>\$13,751,867</b>	<b>\$2,426,800</b>
<b>Grand Total:</b>		<b>\$113,514,267</b>	<b>\$96,631,967</b>	<b>\$16,882,300</b>