

June 30, 2022

## VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Fiscal Year 2022 Annual Gas Cost Recovery Reconciliation  
Docket No. 5180**

Dear Ms. Massaro:

In accordance with the provisions of Rhode Island Energy's<sup>1</sup> Gas Cost Recovery ("GCR") Clause in its gas tariff, R.I.P.U.C. NG-GAS No. 101 at Section 2, Schedule A, Sheet 1, Item 1.2, I have enclosed the Company's annual GCR reconciliation report. The GCR reconciliation contains actual gas cost and revenue data for the 12 months ending March 31, 2022, as set forth in the following six schedules:

- Schedule 1 presents the monthly ending deferred balances and the end-of-period under-recovery of approximately \$11.7 million,<sup>2</sup> as shown on Schedule 1, Line (57).
- Schedule 2 provides a breakdown of actual gas costs.
- Schedule 3 summarizes gas cost revenue.
- Schedule 4 presents the calculation of working capital costs.
- Schedule 5 provides the calculations of inventory finance costs.

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<sup>1</sup> The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

<sup>2</sup> The year-end March 31, 2022 reconciliation balance of \$11,659,178 is the same as the balance reflected in the April 2022 Monthly Deferred Report filed on May 20, 2022 in Docket No. 5180.

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- Schedule 6 presents actual customer throughput for each rate class.

This filing also includes a Motion for Protective Treatment of Confidential Information in accordance with Rule 1.3(H) of the Rhode Island Public Utilities Commission's ("PUC") Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). Rhode Island Energy seeks protection from public disclosure of certain confidential gas cost pricing information, which is provided in Schedule 2 of the filing. This information is confidential information that the Company does not normally make public. Accordingly, Rhode Island Energy has provided the PUC with one complete unredacted copy of the confidential documents in a sealed envelope marked "**Contains Privileged and Confidential Materials – Do Not Release,**" and has included redacted copies of these materials for the public filing.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-709-3337.

Very truly yours,



Leticia C. Pimentel

Enclosures

cc: Docket No. 5180 Service List  
Leo Wold, Esq.  
Al Mancini  
John Bell

**Docket No. 5180 – Rhode Island Energy – 2021 Annual Gas Cost Recovery  
Filing (GCR) - Service List as of 6/17/22**

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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2022 Annual Gas Cost Recovery Filing Reconciliation )  
Docket No. 5180 )  
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**MOTION OF THE NARRAGANSETT ELECTRIC  
COMPANY D/B/A RHODE ISLAND ENERGY FOR PROTECTIVE  
TREATMENT OF CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a Rhode Island Energy (Rhode Island Energy or the Company) hereby requests that the Rhode Island Public Utilities Commission (PUC) grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by PUC Rule 810-RICR-00-00-1.3(H) (“Rule 1.3(H)”) and R.I. Gen. Laws § 38-2-2(4)(B). The Company also hereby requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.3(H)(2).

**I. BACKGROUND**

On June 30, 2022, the Company filed with the PUC its 2022 annual Gas Cost Recovery (GCR) reconciliation filing. Schedule 2 of the filing provides a breakdown of actual gas costs, and includes confidential gas cost pricing information relating to certain gas supply and storage fixed costs. The Company is seeking protective treatment for such confidential gas cost pricing information and has, accordingly, included a redacted and un-redacted version of Schedule 2. The Company requests that the PUC grant protective treatment to the confidential information contained in the un-redacted version of Schedule 2 of this filing.

## II. LEGAL STANDARD

Rule 1.3(H) of the PUC's Rules of Practice and Procedure provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2(4). To the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of APRA to deem such information as confidential and to protect such information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies requires the application of a two-pronged test set forth in *Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001). The exemption applies where disclosure of information would be likely either (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. *See Providence Journal*, 774 A.2d at 47.

The first prong of the test assesses whether the information was provided voluntarily to the governmental agency. *Providence Journal*, 774 A.2d at 47. If the answer to the first question

is affirmative, then the question becomes whether the information is “of a kind that would customarily not be released to the public by the person from whom it was obtained.” *Id.*

### **III. BASIS FOR CONFIDENTIALITY**

The gas cost pricing information included in Schedule 2 of the Company’s 2022 annual GCR reconciliation filing is confidential and privileged information of the type that the Company would not ordinarily make public. The information the Company seeks to protect consists of actual gas costs relating to certain gas supply and storage fixed costs. The Company ordinarily would not make such information public, as the information consists of confidential and competitively sensitive gas cost pricing information. Public disclosure of such information could impair the Company’s ability to obtain advantageous pricing in the future, thereby causing substantial competitive harm. Accordingly, National Grid seeks protection for such confidential information.

### **IV. CONCLUSION**

For the foregoing reasons, the Company respectfully requests that the PUC grant its Motion for Protective Treatment.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a RHODE ISLAND ENERGY**

By its attorney,



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Leticia C. Pimentel, Esq. (#9332)  
Robinson & Cole LLP  
One Financial Plaza, 14th Floor  
Providence, RI 02903  
401-709-3337  
Dated: June 30, 2022

Deferred Gas Cost Balances

Description	Apr-21 Actual	May-21 Actual	Jun-21 Actual	Jul-21 Actual	Aug-21 Actual	Sep-21 Actual	Oct-21 Actual	Nov-21 Actual	Dec-21 Actual	Jan-22 Actual	Feb-22 Actual	Mar-22 Actual	Apr-Mar
(1) # of Days in Month	30 (a)	31 (b)	30 (c)	31 (d)	31 (e)	30 (f)	31 (g)	30 (h)	31 (i)	31 (j)	28 (k)	31 (l)	365 (m)
<b>I Fixed Cost Deferred</b>													
(2) Beginning Under/(Over) Recovery	(\$11,636,525)	(\$13,864,154)	(\$13,168,237)	(\$10,294,563)	(\$6,558,105)	(\$3,408,687)	\$76,011	\$3,599,748	\$5,597,557	\$5,373,221	\$831,550	(\$4,932,771)	(\$11,636,525)
(3) Supply Fixed Costs (net of cap rel)	\$5,642,607	\$5,545,613	\$5,818,330	\$5,462,123	\$5,428,320	\$5,527,961	\$5,724,356	\$6,294,660	\$11,100,764	\$10,874,060	\$10,878,670	\$11,856,836	\$90,154,298
(4) Supply Related System Pressure to DAC	(\$5,414)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,156)	(\$2,300,929)	(\$2,102,104)	(\$2,083,120)	(\$2,034,875)	(\$8,670,045)
(5) Supply Related LNG O&M	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$69,152	\$600,056
(6) NGPMP Credits	(\$437,588)	(\$437,588)	(\$437,588)	(\$105,189)	(\$437,588)	(\$457,423)	(\$437,588)	(\$669,932)	(\$669,932)	(\$2,259,353)	(\$669,932)	(\$4,654,267)	(\$11,673,965)
(7) Working Capital	\$42,644	\$41,795	\$43,858	\$41,164	\$40,908	\$41,662	\$43,147	\$46,220	\$64,822	\$64,617	\$64,790	\$72,351	\$607,978
(8) Total Supply Fixed Costs	\$5,311,400	\$5,198,398	\$5,473,178	\$5,446,675	\$5,080,218	\$5,160,777	\$5,378,493	\$5,719,943	\$8,263,876	\$6,646,372	\$8,259,561	\$5,079,431	\$71,018,322
(9) Supply Fixed - Revenue	\$7,525,937	\$4,488,139	\$2,587,457	\$1,701,276	\$1,925,512	\$1,476,367	\$1,856,706	\$3,726,857	\$8,494,033	\$11,191,334	\$14,021,917	\$10,802,576	\$69,996,112
(10) Monthly Under/(Over) Recovery	(\$2,214,537)	\$710,259	\$2,885,721	\$3,745,399	\$3,154,705	\$3,486,410	\$3,521,787	\$1,993,086	(\$230,157)	(\$4,544,962)	(\$5,762,356)	(\$5,723,146)	\$1,022,210
(11) Prelim Ending Under/(Over) Recovery	(\$13,851,061)	(\$13,153,895)	(\$10,282,516)	(\$6,549,164)	(\$3,403,400)	\$77,722	\$3,597,798	\$5,592,835	\$5,367,400	\$828,258	(\$4,930,806)	(\$10,655,917)	(\$10,614,315)
(12) Month's Average Balance	(\$12,743,793)	(\$13,509,025)	(\$11,725,377)	(\$8,421,863)	(\$4,980,752)	(\$1,665,483)	\$1,836,905	\$4,596,292	\$5,482,478	\$3,100,739	(\$2,049,628)	(\$7,794,344)	
(13) Interest Rate (BOA Prime minus 200 bps)	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.37%
(14) Interest Applied	(\$13,093)	(\$14,342)	(\$12,047)	(\$8,941)	(\$5,288)	(\$1,711)	\$1,950	\$4,722	\$5,820	\$3,292	(\$1,965)	(\$9,076)	(\$50,678)
(15) Marketer Reconciliation	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(16) Fixed Ending Under/(Over) Recovery	(\$13,864,154)	(\$13,168,237)	(\$10,294,563)	(\$6,558,105)	(\$3,408,687)	\$76,011	\$3,599,748	\$5,597,557	\$5,373,221	\$831,550	(\$4,932,771)	(\$10,664,992)	(\$10,664,992)
<b>II Variable Cost Deferred</b>													
(17) Beginning Under/(Over) Recovery	\$14,095,362	\$11,279,428	\$9,200,801	\$8,449,829	\$8,544,732	\$9,161,532	\$9,560,171	\$9,981,529	\$12,885,890	\$11,441,585	\$22,637,551	\$23,313,734	\$14,095,362
(18) Variable Supply Costs	\$4,842,056	\$2,380,847	\$1,654,565	\$1,559,313	\$2,326,413	\$1,822,899	\$2,041,961	\$6,682,445	\$8,311,948	\$24,074,997	\$17,100,507	\$9,616,502	\$82,414,453
(19) Supply Related System Pressure to DAC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(20) Supply Related LNG O & M	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$25,187	\$302,244
(21) Inventory Financing - LNG	\$22,641	\$22,543	\$22,448	\$22,114	\$22,078	\$22,185	\$24,304	\$25,041	\$24,539	\$24,656	\$24,655	\$27,509	\$284,712
(22) Inventory Financing - UG	\$43,664	\$45,398	\$44,966	\$47,761	\$50,178	\$56,731	\$55,447	\$51,353	\$54,758	\$52,608	\$53,532	\$57,508	\$613,905
(23) Working Capital	\$36,629	\$18,010	\$12,516	\$11,796	\$17,599	\$13,790	\$15,447	\$49,225	\$61,228	\$177,343	\$125,967	\$70,838	\$610,387
(24) Total Supply Variable Costs	\$4,970,176	\$2,491,986	\$1,759,682	\$1,666,170	\$2,441,455	\$1,940,792	\$2,162,346	\$6,833,251	\$8,477,660	\$24,354,791	\$17,329,848	\$9,797,544	\$84,225,701
(25) Supply Variable - Revenue	\$7,799,139	\$4,581,479	\$2,519,717	\$1,580,284	\$1,834,049	\$1,551,765	\$1,751,355	\$3,961,268	\$9,934,871	\$13,176,906	\$16,675,686	\$12,753,686	\$78,119,604
(26) Monthly Under/(Over) Recovery	(\$2,828,962)	(\$2,089,493)	(\$760,034)	\$85,887	\$607,406	\$389,027	\$410,991	\$2,871,983	(\$1,457,211)	\$11,177,885	\$654,162	(\$2,955,541)	\$6,106,097
(27) Prelim Ending Under/(Over) Recovery	\$11,266,400	\$9,189,935	\$8,440,766	\$8,535,716	\$9,152,138	\$9,550,559	\$9,971,162	\$12,853,512	\$11,428,679	\$22,619,470	\$23,291,713	\$20,358,192	\$20,201,460
(28) Month's Average Balance	\$12,880,881	\$10,234,682	\$8,820,784	\$8,492,772	\$8,848,435	\$9,356,045	\$9,765,666	\$11,417,521	\$12,157,285	\$17,030,528	\$22,964,632	\$21,853,963	
(29) Interest Rate (BOA Prime minus 200 bps)	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.37%
(30) Interest Applied	\$13,028	\$10,866	\$9,062	\$9,016	\$9,394	\$9,612	\$10,368	\$11,730	\$12,907	\$18,080	\$22,021	\$25,425	\$161,510
(31) Gas Procurement Incentive/(penalty)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(32) Variable Ending Under/(Over) Recovery	\$11,279,428	\$9,200,801	\$8,449,829	\$8,544,732	\$9,161,532	\$9,560,171	\$9,981,529	\$12,885,890	\$11,441,585	\$22,637,551	\$23,313,734	\$20,383,618	\$20,383,618
<b>III COVID Deferred</b>													
(33) Beginning Balance	\$3,330,403	\$3,852,884	\$4,159,592	\$4,331,097	\$4,439,946	\$4,564,971	\$4,672,130	\$4,792,618	\$4,808,823	\$4,267,226	\$3,546,676	\$2,637,642	\$3,330,403
(34) COVID Cost Deferral	\$518,793	\$302,457	\$162,146	\$104,195	\$120,247	\$102,417	\$115,467	\$111,275	(\$546,412)	(\$724,696)	(\$911,998)	(\$699,753)	(\$1,440,862)
(35) Prelim Ending Balance	\$3,849,196	\$4,155,341	\$4,326,738	\$4,435,293	\$4,560,193	\$4,667,388	\$4,787,597	\$4,803,893	\$4,262,411	\$3,542,530	\$2,634,678	\$1,937,889	
(36) Month's Average Balance	\$3,589,800	\$4,004,113	\$4,243,165	\$4,383,195	\$4,500,070	\$4,616,179	\$4,729,863	\$4,798,256	\$4,535,617	\$3,904,878	\$3,090,677	\$2,287,765	
(37) Interest Rate (BOA Prime minus 200 bps)	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.37%
(38) Interest Applied	\$3,688	\$4,251	\$4,359	\$4,653	\$4,777	\$4,743	\$5,021	\$4,930	\$4,815	\$4,146	\$2,964	\$2,664	\$51,011
(39) Ending Balance	\$3,852,884	\$4,159,592	\$4,331,097	\$4,439,946	\$4,564,971	\$4,672,130	\$4,792,618	\$4,808,823	\$4,267,226	\$3,546,676	\$2,637,642	\$1,940,552	\$1,940,552
<b>GCR Deferred Summary</b>													
(40) Beginning Under/(Over) Recovery	\$5,789,241	\$1,268,158	\$192,156	\$2,486,364	\$6,426,573	\$10,317,815	\$14,308,312	\$18,373,896	\$23,292,270	\$21,082,032	\$27,015,777	\$21,018,604	\$5,789,241
(41) Gas Costs	\$10,573,587	\$8,000,225	\$7,546,659	\$7,095,200	\$7,828,497	\$7,424,624	\$7,840,082	\$13,051,288	\$17,206,121	\$32,941,292	\$25,990,397	\$19,303,035	\$164,801,007
(42) Inventory Finance	\$66,305	\$67,942	\$67,414	\$69,875	\$72,256	\$78,916	\$79,751	\$76,394	\$79,297	\$77,264	\$78,187	\$85,017	\$898,617
(43) Working Capital	\$79,272	\$59,806	\$56,375	\$52,959	\$58,507	\$55,451	\$58,594	\$95,444	\$126,050	\$241,960	\$190,757	\$143,189	\$1,218,364
(44) NGPMP Credits	(\$437,588)	(\$437,588)	(\$437,588)	(\$105,189)	(\$437,588)	(\$457,423)	(\$437,588)	(\$669,932)	(\$669,932)	(\$2,259,353)	(\$669,932)	(\$4,654,267)	(\$11,673,965)
(45) Total Costs	\$10,281,577	\$7,690,384	\$7,232,860	\$7,112,845	\$7,521,673	\$7,101,569	\$7,540,839	\$12,553,194	\$16,741,536	\$31,001,163	\$25,589,409	\$14,876,975	\$155,244,024
(46) Revenue	\$14,806,283	\$8,767,161	\$4,940,028	\$3,177,364	\$3,639,314	\$3,123,715	\$3,492,594	\$7,676,850	\$18,975,317	\$25,092,936	\$31,609,601	\$24,255,414	\$149,556,578
(47) Monthly Under/(Over) Recovery	(\$4,524,706)	(\$1,076,777)	\$2,292,832	\$3,935,481	\$3,882,358	\$3,977,854	\$4,048,244	\$4,876,344	(\$2,233,781)	\$5,908,227	(\$6,020,191)	(\$9,378,440)	\$5,687,445
(48) Prelim Ending Under/(Over) Recovery	\$1,264,535	\$191,381	\$2,484,988	\$6,421,845	\$10,308,931	\$14,295,668	\$18,356,557	\$23,250,240	\$21,058,490	\$26,990,259	\$20,995,585	\$11,640,164	
(49) Month's Average Balance	\$3,526,888	\$729,770	\$4,454,104	\$8,367,752	\$12,306,742	\$16,332,435	\$20,812,068	\$22,175,380	\$24,036,145	\$24,036,145	\$24,036,145	\$16,329,384	
(50) Interest Rate (BOA Prime minus 200 bps)	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.25%	1.37%
(51) Interest Applied	\$3,624	\$775	\$1,375	\$4,729	\$8,884	\$12,644	\$17,339	\$21,382	\$23,542	\$25,518	\$23,019	\$19,014	\$161,844
(52) Gas Purchase Plan Incentives/(Penalties)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(53) Ending Under/(Over) Recovery W/ Interest	\$1,268,158	\$192,156	\$2,486,364	\$6,426,573	\$10,317,815	\$14,308,312	\$18,373,896	\$23,292,270	\$21,082,032	\$27,015,777	\$21,018,604	\$11,659,178	\$11,659,178

(3) Dkt 5066, Sch RMS/MJP-2, pg 1, line (17), col (m)  
 (4) Sch 2, line (44)  
 (5) Dkt 4955; Dkt 5040  
 (6) Docket 4770  
 (8) Sch 4, line (15)  
 (9) Sum(Lines (4) : (8))  
 (10) Sch 3, line (10)  
 (11) Line (9) - Line (10)  
 (12) Line (3) + Line (11)

(13) [Line (3) + Line (12)] ÷ 2  
 (15) [(Line (13) x Line (14)) ÷ 365] x Line (1)  
 (16) Dkt 5066  
 (17) Line (12) + Line (15) + Line (16)  
 (19) Dkt 5066, Sch RMS/MJP-2, pg 1, line (34), col (m)  
 (20) Sch 2, line (100)  
 (21) Dkt 4955; Dkt 5040  
 (22) Docket 4770  
 (23) Sch 5, line (22)

(24) Sch 5, line (12)  
 (25) Sch 4, line (30)  
 (26) Sum(Lines (20) : (25))  
 (27) Sch 3, line (24)  
 (28) Line (26) - Line (27)  
 (29) Line (19) + Line (28)  
 (30) [Line (19) + Line (29)] ÷ 2  
 (32) [(Line (30) x Line (31)) ÷ 365] x Line (1)  
 (34) Line (29) + Line (32) + Line (33)

(37) Sch 6, Line (38)  
 (38) Line (36) + Line (37)  
 (39) [(Line (36) + Line (38)) ÷ 2  
 (41) [(Line (39) x Line (40)) ÷ 365] x Line (1)  
 (42) Line (38) + Line (41)  
 (44) Line (3) + Line (19) + Line (36)  
 (45) Sum(Lines (4) (6), (16), (20):(22))  
 (46) Line (23) + Line (24)  
 (47) Line (8) + Line (25)

(48) Line (7)  
 (49) Sum(Lines (45) : (48))  
 (50) Line (10) + Line (27) + Line (37)  
 (51) Line (49) - Line (50)  
 (52) Line (44) + Line (51)  
 (53) [(Line (44) + Line (52)) ÷ 2  
 (55) Line (15) + Line (32) + Line (41)  
 (56) Line (33)  
 (57) Line (52) + Line (55) + Line (56)











**WORKING CAPITAL**

	<u>Apr-21</u>	<u>May-21</u>	<u>Jun-21</u>	<u>Jul-21</u>	<u>Aug-21</u>	<u>Sep-21</u>	<u>Oct-21</u>	<u>Nov-21</u>	<u>Dec-21</u>	<u>Jan-22</u>	<u>Feb-22</u>	<u>Mar-22</u>	<u>Apr-Mar</u>
	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	(m)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	
<u>Description</u>													
(1) <b>Supply Fixed Costs</b>	\$5,642,607	\$5,545,613	\$5,818,330	\$5,462,123	\$5,428,320	\$5,527,961	\$5,724,356	\$6,294,660	\$11,100,764	\$10,874,060	\$10,878,670	\$11,856,836	\$90,154,298
(2) Less: System Pressure to DAC	(\$5,414)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,156)	(\$2,300,929)	(\$2,102,104)	(\$2,083,120)	(\$2,034,875)	(\$8,670,045)
(3) Plus: Supply Related LNG O&M Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(4) Total Adjustments	(\$5,414)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,574)	(\$20,156)	(\$2,300,929)	(\$2,102,104)	(\$2,083,120)	(\$2,034,875)	(\$8,670,045)
(5) Allowable Working Capital Costs	\$5,637,192	\$5,525,039	\$5,797,755	\$5,441,548	\$5,407,746	\$5,507,386	\$5,703,781	\$6,274,503	\$8,799,834	\$8,771,956	\$8,795,551	\$9,821,961	\$81,484,254
(6) Number of Days Lag	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92
(7) Working Capital Requirement	\$508,428	\$498,313	\$522,910	\$490,783	\$487,734	\$496,721	\$514,434	\$565,909	\$793,673	\$791,158	\$793,286	\$885,860	
(8) Cost of Capital	7.13%	7.13%	7.13%	7.13%	7.13%	7.13%	7.13%	6.91%	6.91%	6.91%	6.91%	6.91%	
(9) Return on Working Capital Requirement	\$36,251	\$35,530	\$37,283	\$34,993	\$34,775	\$35,416	\$36,679	\$39,104	\$54,843	\$54,669	\$54,816	\$61,213	
(10) Weighted Cost of Debt	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%	2.18%	2.18%	2.18%	2.18%	2.18%	
(11) Interest Expense	\$12,202	\$11,960	\$12,550	\$11,779	\$11,706	\$11,921	\$12,346	\$12,337	\$17,302	\$17,247	\$17,294	\$19,312	
(12) Taxable Income	\$24,049	\$23,570	\$24,734	\$23,214	\$23,070	\$23,495	\$24,333	\$26,767	\$37,541	\$37,422	\$37,522	\$41,901	
(13) 1 - Combined Tax Rate	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	
(14) Return and Tax Requirement	\$30,441	\$29,836	\$31,308	\$29,385	\$29,202	\$29,740	\$30,801	\$33,883	\$47,520	\$47,369	\$47,497	\$53,039	
(15) <b>Supply Fixed Working Capital Requirement</b>	\$42,644	\$41,795	\$43,858	\$41,164	\$40,908	\$41,662	\$43,147	\$46,220	\$64,822	\$64,617	\$64,790	\$72,351	\$607,978
(16) <b>Supply Variable Costs</b>	\$4,842,056	\$2,380,847	\$1,654,565	\$1,559,313	\$2,326,413	\$1,822,899	\$2,041,961	\$6,682,445	\$8,311,948	\$24,074,997	\$17,100,507	\$9,616,502	\$82,414,453
(17) Less: Bal Related Syst Pressure Commodity to DAC	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(18) Plus: Supply Related LNG O&M Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(19) Total Adjustments	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
(20) Allowable Working Capital Costs	\$4,842,056	\$2,380,847	\$1,654,565	\$1,559,313	\$2,326,413	\$1,822,899	\$2,041,961	\$6,682,445	\$8,311,948	\$24,074,997	\$17,100,507	\$9,616,502	\$82,414,453
(21) Number of Days Lag	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92	32.92
(22) Working Capital Requirement	\$436,714	\$214,733	\$149,228	\$140,637	\$209,823	\$164,410	\$184,168	\$602,702	\$749,669	\$2,171,367	\$1,542,325	\$867,329	
(23) Cost of Capital	7.13%	7.13%	7.13%	7.13%	7.13%	7.13%	7.13%	6.91%	6.91%	6.91%	6.91%	6.91%	
(24) Return on Working Capital Requirement	\$31,138	\$15,310	\$10,640	\$10,027	\$14,960	\$11,722	\$13,131	\$41,647	\$51,802	\$150,041	\$106,575	\$59,932	
(25) Weighted Cost of Debt	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%	2.40%	2.18%	2.18%	2.18%	2.18%	2.18%	
(26) Interest Expense	\$10,481	\$5,154	\$3,581	\$3,375	\$5,036	\$3,946	\$4,420	\$13,139	\$16,343	\$47,336	\$33,623	\$18,908	
(27) Taxable Income	\$20,657	\$10,157	\$7,058	\$6,652	\$9,925	\$7,777	\$8,711	\$28,508	\$35,459	\$102,706	\$72,952	\$41,025	
(28) 1 - Combined Tax Rate <sup>2</sup>	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	
(29) Return and Tax Requirement	\$26,148	\$12,857	\$8,935	\$8,420	\$12,563	\$9,844	\$11,027	\$36,086	\$44,885	\$130,007	\$92,344	\$51,930	
(30) <b>Supply Variable Working Capital Requirement</b>	\$36,629	\$18,010	\$12,516	\$11,796	\$17,599	\$13,790	\$15,447	\$49,225	\$61,228	\$177,343	\$125,967	\$70,838	\$610,387

(1) Sch 1, line (4)  
(2) Sch 1, line (5)  
(3) Docket 4770  
(4) Line (2) + Line (3)  
(5) Line (1) + Line (4)  
(6) Docket 4770

(7) [Line (5) x Line (6)] ÷ 365  
(8) Docket 4770  
(9) Line (7) x Line (8)  
(10) Docket 4770  
(11) Line (7) x Line (10)  
(12) Line (9) - Line (11)

(13) Docket 4770  
(14) Line (12) ÷ Line (13)  
(15) Line (11) + Line (14)  
(16) Sch 1, line (20)  
(17) Sch 1, line (21)  
(18) Docket 4770

(19) Line (17) + Line (18)  
(20) Line (16) + Line (19)  
(21) Docket 4770  
(22) [Line (20) x Line (21)] ÷ 365  
(23) Docket 4770  
(24) Line (22) x Line (23)

(25) Docket 4770  
(26) Line (22) x Line (25)  
(27) Line (24) - Line (26)  
(28) Docket 4770  
(29) Line (27) ÷ Line (28)  
(30) Line (26) + Line (29)

**INVENTORY FINANCE**

	<u>Apr-21</u>	<u>May-21</u>	<u>Jun-21</u>	<u>Jul-21</u>	<u>Aug-21</u>	<u>Sep-21</u>	<u>Oct-21</u>	<u>Nov-21</u>	<u>Dec-21</u>	<u>Jan-22</u>	<u>Feb-22</u>	<u>Mar-22</u>	<u>Apr-Mar</u>
	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	<u>Actual</u>	
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
Description													
(1) <b>Storage Inventory Balance</b>	\$6,249,978	\$6,727,440	\$6,919,386	\$7,687,536	\$8,681,173	\$10,726,463	\$11,952,578	\$11,389,695	\$11,028,595	\$9,483,418	\$8,605,364	\$8,449,452	
(2) Monthly Storage Deferral/Amortization	<u>(\$2,895)</u>	<u>(\$232,166)</u>	<u>(\$485,997)</u>	<u>(\$854,188)</u>	<u>(\$1,502,083)</u>	<u>(\$2,609,778)</u>	<u>(\$4,019,658)</u>	<u>(\$3,844,613)</u>	<u>(\$2,983,161)</u>	<u>(\$1,753,867)</u>	<u>(\$740,044)</u>	<u>\$1</u>	
(3) <b>Subtotal</b>	\$6,247,083	\$6,495,274	\$6,433,389	\$6,833,348	\$7,179,089	\$8,116,685	\$7,932,921	\$7,545,082	\$8,045,433	\$7,729,551	\$7,865,320	\$8,449,454	
(4) Cost of Capital	7 13%	7 13%	7 13%	7 13%	7 13%	7 13%	7 13%	6 91%	6 91%	6 91%	6 91%	6 91%	
(5) Return on Working Capital Requirement	\$445,417	\$463,113	\$458,701	\$487,218	\$511,869	\$578,720	\$565,617	\$521,365	\$555,939	\$534,112	\$543,494	\$583,857	\$6,249,422
(6) Weighted Cost of Debt	2 40%	2 40%	2 40%	2 40%	2 40%	2 40%	2 40%	2 18%	2 18%	2 18%	2 18%	2 18%	
(7) Interest Charges Financed	\$149,930	\$155,887	\$154,401	\$164,000	\$172,298	\$194,800	\$190,390	\$164,483	\$175,390	\$168,504	\$171,464	\$184,198	\$2,045,746
(8) Taxable Income	\$295,487	\$307,226	\$304,299	\$323,217	\$339,571	\$383,919	\$375,227	\$356,882	\$380,549	\$365,608	\$372,030	\$399,659	
(9) 1 - Combined Tax Rate	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	
(10) Return and Tax Requirement	\$374,034	\$388,894	\$385,189	\$409,136	\$429,837	\$485,974	\$474,971	\$451,750	\$481,708	\$462,795	\$470,924	\$505,898	\$5,321,108
(11) Working Capital Requirement	\$523,964	\$544,781	\$539,590	\$573,136	\$602,135	\$680,774	\$665,361	\$616,233	\$657,098	\$631,299	\$642,388	\$690,096	\$7,366,855
(12) Monthly Average	\$43,664	\$45,398	\$44,966	\$47,761	\$50,178	\$56,731	\$55,447	\$51,353	\$54,758	\$52,608	\$53,532	\$57,508	\$613,905
(13) <b>LNG Inventory Balance</b>	\$3,239,295	\$3,225,320	\$3,211,678	\$3,163,845	\$3,158,813	\$3,174,078	\$3,477,218	\$3,679,159	\$3,605,444	\$3,622,604	\$3,622,437	\$4,041,821	
(14) Cost of Capital	7 13%	7 13%	7 13%	7 13%	7 13%	7 13%	7 13%	6 91%	6 91%	6 91%	6 91%	6 91%	
(15) Return on Working Capital Requirement	\$230,962	\$229,965	\$228,993	\$225,582	\$225,223	\$226,312	\$247,926	\$254,230	\$249,136	\$250,322	\$250,310	\$279,290	\$2,898,251
(16) Weighted Cost of Debt	2 40%	2 40%	2 40%	2 40%	2 40%	2 40%	2 40%	2 18%	2 18%	2 18%	2 18%	2 18%	
(17) Interest Charges Financed	\$77,743	\$77,408	\$77,080	\$75,932	\$75,812	\$76,178	\$83,453	\$80,206	\$78,599	\$78,973	\$78,969	\$88,112	\$948,464
(18) Taxable Income	\$153,219	\$152,558	\$151,912	\$149,650	\$149,412	\$150,134	\$164,472	\$174,024	\$170,538	\$171,349	\$171,341	\$191,178	
(19) 1 - Combined Tax Rate	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	0 79	
(20) Return and Tax Requirement	\$193,948	\$193,111	\$192,294	\$189,430	\$189,129	\$190,043	\$208,193	\$220,284	\$215,870	\$216,898	\$216,888	\$241,998	\$2,468,085
(21) Working Capital Requirement	\$271,691	\$270,519	\$269,374	\$265,362	\$264,940	\$266,221	\$291,646	\$300,489	\$294,469	\$295,870	\$295,857	\$330,109	\$3,416,549
(22) Monthly Average	\$22,641	\$22,543	\$22,448	\$22,114	\$22,078	\$22,185	\$24,304	\$25,041	\$24,539	\$24,656	\$24,655	\$27,509	\$284,712
(23) <b>TOTAL GCR Inventory Financing Costs</b>	\$66,305	\$67,942	\$67,414	\$69,875	\$72,256	\$78,916	\$79,751	\$76,394	\$79,297	\$77,264	\$78,187	\$85,017	\$898,617

(3) Line (1) + Line (2)  
(4) Docket 4770  
(5) Line (3) x Line (4)  
(6) Docket 4770  
(7) Line (3) x Line (6)  
(8) Line (5) - Line (7)  
(9) Docket 4770

(10) Line (8) ÷ Line (9)  
(11) Line (7) + Line (10)  
(12) Line (11) ÷ 12  
(14) Docket 4770  
(15) Line (13) x Line (14)  
(16) Docket 4770  
(17) Line (13) x Line (16)

(18) Line (15) - Line (17)  
(19) Docket 4770  
(20) Line (18) ÷ Line (19)  
(21) Line (17) + Line (20)  
(22) Line (21) ÷ 12  
(23) Line (12) + Line (22)

**Actual Dth Usage for Filing**

	<u>Apr-21</u> <u>Actual</u> (a)	<u>May-21</u> <u>Actual</u> (b)	<u>Jun-21</u> <u>Actual</u> (c)	<u>Jul-21</u> <u>Actual</u> (d)	<u>Aug-21</u> <u>Actual</u> (e)	<u>Sep-21</u> <u>Actual</u> (f)	<u>Oct-21</u> <u>Actual</u> (g)	<u>Nov-21</u> <u>Actual</u> (h)	<u>Dec-21</u> <u>Actual</u> (i)	<u>Jan-22</u> <u>Actual</u> (j)	<u>Feb-22</u> <u>Actual</u> (k)	<u>Mar-22</u> <u>Actual</u> (l)	<u>Apr-Mar</u>  (m)
<b>THROUGHPUT (Dth)</b>													
<u>Rate Class</u>													
(1) <b>SALES</b>													
(2) Residential Non-Heating	34,029	23,197	17,925	12,436	11,714	10,845	13,047	17,050	27,945	34,833	42,634	34,760	280,413
(3) Residential Non-Heating Low Income	2,131	1,380	1,007	869	920	807	976	1,445	2,347	2,871	3,610	2,822	21,184
(4) Residential Heating	1,814,236	1,050,464	576,769	366,195	365,369	339,355	401,934	876,018	2,090,016	2,779,726	3,457,289	2,623,099	16,740,469
(5) Residential Heating Low Income	168,437	97,119	56,418	42,515	42,792	38,309	47,020	101,407	218,612	280,070	362,471	276,386	1,731,554
(6) Small C&I	224,067	113,818	56,289	33,403	61,290	19,839	39,358	93,411	258,466	382,779	502,073	378,396	2,163,188
(7) Medium C&I	316,650	192,394	113,953	83,029	90,150	92,750	97,556	157,051	375,818	474,276	582,551	463,274	3,039,449
(8) Large LLF	56,349	36,999	17,944	8,247	25,418	9,476	(24,173)	28,156	81,584	94,784	142,136	98,874	575,793
(9) Large HLF	21,784	17,117	15,973	14,234	14,110	12,162	14,272	15,573	26,551	26,488	32,869	38,133	249,265
(10) Extra Large LLF	3,764	2,971	1,422	643	189	79	405	1,319	2,843	2,819	4,662	4,487	25,601
(11) Extra Large HLF	7,032	7,147	6,797	6,386	8,562	6,991	7,013	9,675	13,036	12,160	7,987	21,793	114,579
(12) Total Sales	2,648,478	1,542,605	864,496	567,956	620,513	530,611	597,405	1,301,105	3,097,217	4,090,805	5,138,281	3,942,023	24,941,495
(13) <b>TSS</b>													
(14) Small	1,014	746	28	28	777	1	20	47	479	2,289	3,377	1,553	10,358
(15) Medium	10,755	7,730	1,073	1,274	2,682	779	1,020	2,395	4,154	9,175	14,808	12,957	68,802
(16) Large LLF	5,888	3,547	122	25	20	16	29	405	1,361	1,124	6,224	4,630	23,390
(17) Large HLF	334	1,162	0	0	0	0	902	830	1,562	1,770	3,694	2,946	13,199
(18) Extra Large LLF	0	0	0	0	0	0	0	0	0	0	0	0	0
(19) Extra Large HLF	0	0	0	0	0	0	0	0	0	0	0	0	0
(20) Total TSS	17,991	13,185	1,223	1,327	3,479	796	1,971	3,677	7,556	14,358	28,103	22,085	115,748
(21) <b>Sales &amp; TSS THROUGHPUT</b>													
(22) Residential Non-Heating	34,029	23,197	17,925	12,436	11,714	10,845	13,047	17,050	27,945	34,833	42,634	34,760	280,413
(23) Residential Non-Heating Low Income	2,131	1,380	1,007	869	920	807	976	1,445	2,347	2,871	3,610	2,822	21,184
(24) Residential Heating	1,814,236	1,050,464	576,769	366,195	365,369	339,355	401,934	876,018	2,090,016	2,779,726	3,457,289	2,623,099	16,740,469
(25) Residential Heating Low Income	168,437	97,119	56,418	42,515	42,792	38,309	47,020	101,407	218,612	280,070	362,471	276,386	1,731,554
(26) Small C&I	225,081	114,564	56,317	33,431	62,067	19,840	39,377	93,458	258,945	385,068	505,450	379,949	2,173,546
(27) Medium C&I	327,405	200,124	115,026	84,302	92,832	93,529	98,576	159,446	379,971	483,450	597,358	476,231	3,108,250
(28) Large LLF	62,237	40,547	18,066	8,271	25,437	9,492	(24,145)	28,560	82,945	95,908	148,360	103,504	599,183
(29) Large HLF	22,118	18,278	15,973	14,234	14,110	12,162	15,174	16,404	28,113	28,258	36,563	41,078	262,464
(30) Extra Large LLF	3,764	2,971	1,422	643	189	79	405	1,319	2,843	2,819	4,662	4,487	25,601
(31) Extra Large HLF	7,032	7,147	6,797	6,386	8,562	6,991	7,013	9,675	13,036	12,160	7,987	21,793	114,579
(32) Total Sales & TSS Throughput	2,666,469	1,555,790	865,719	569,283	623,992	531,407	599,376	1,304,782	3,104,773	4,105,163	5,166,383	3,964,108	25,057,243
(33) <b>FT-1 TRANSPORTATION</b>													
(34) FT-1 Small	0	0	0	0	0	0	0	0	0	0	0	0	0
(35) FT-1 Medium	56,825	26,595	14,819	11,454	21,774	(13,496)	39,277	36,028	78,189	77,145	110,056	58,104	516,770
(36) FT-1 Large LLF	83,147	35,511	(501)	579	14,006	17,138	18,594	57,441	152,925	132,303	208,845	91,761	811,749
(37) FT-1 Large HLF	30,134	19,524	23,373	20,975	40,338	13,458	28,793	26,635	44,169	36,279	56,326	25,455	365,460
(38) FT-1 Extra Large LLF	120,997	49,582	(6,597)	(1,317)	20,649	19,333	28,559	73,507	193,626	178,365	247,104	168,286	1,092,095
(39) FT-1 Extra Large HLF	545,631	367,165	395,978	430,729	407,953	440,373	393,641	470,231	516,587	574,697	600,503	446,653	5,590,140
(40) Default	6,058	3,408	106	(174)	1,235	981	1,255	2,679	9,958	8,689	9,162	6,638	49,993
(41) Total FT-1 Transportation	842,793	501,785	427,178	462,245	505,954	477,788	510,118	666,521	995,454	1,007,478	1,231,995	796,897	8,426,207
(42) <b>FT-2 TRANSPORTATION</b>													
(43) FT-2 Small	18,987	11,207	5,686	3,398	4,442	3,269	4,466	9,067	21,364	27,096	35,733	26,411	171,125
(44) FT-2 Medium	193,908	123,388	76,353	49,152	51,566	46,338	47,943	93,812	207,302	252,893	302,223	242,759	1,687,637
(45) FT-2 Large LLF	154,638	92,937	28,202	24,466	16,325	15,962	24,869	69,890	188,731	242,227	259,945	239,790	1,357,979
(46) FT-2 Large HLF	58,111	49,549	47,399	31,139	35,253	34,774	30,398	31,276	61,593	59,934	68,295	59,079	566,799
(47) FT-2 Extra Large LLF	6,859	3,928	1,757	1,286	1,584	1,185	1,265	8,497	10,128	10,128	12,706	11,432	63,303
(48) FT-2 Extra Large HLF	33,244	34,337	32,977	27,015	27,744	37,403	35,765	36,594	56,374	43,304	49,724	45,212	459,695
(49) Total FT-2 Transportation	465,746	315,345	192,374	136,456	136,914	138,930	144,707	243,316	543,860	635,582	728,626	624,682	4,306,538
(50) <b>Total THROUGHPUT</b>													
(51) Residential Non-Heating	34,029	23,197	17,925	12,436	11,714	10,845	13,047	17,050	27,945	34,833	42,634	34,760	280,413
(52) Residential Non-Heating Low Income	2,131	1,380	1,007	869	920	807	976	1,445	2,347	2,871	3,610	2,822	21,184
(53) Residential Heating	1,814,236	1,050,464	576,769	366,195	365,369	339,355	401,934	876,018	2,090,016	2,779,726	3,457,289	2,623,099	16,740,469
(54) Residential Heating Low Income	168,437	97,119	56,418	42,515	42,792	38,309	47,020	101,407	218,612	280,070	362,471	276,386	1,731,554
(55) Small C&I	244,067	125,771	62,003	36,829	66,509	23,109	43,844	102,525	280,309	412,164	541,183	406,360	2,344,671
(56) Medium C&I	578,137	350,108	206,197	144,908	166,172	126,371	185,796	289,286	665,462	813,488	1,009,638	777,094	5,312,657
(57) Large LLF	300,022	168,994	45,768	33,316	55,768	42,592	19,318	155,891	424,600	470,438	617,149	435,055	2,768,911
(58) Large HLF	110,363	87,351	86,745	66,348	89,701	60,394	74,365	74,314	133,875	124,472	161,184	125,613	1,194,723
(59) Extra Large LLF	131,620	56,481	(3,418)	613	22,421	20,597	30,230	77,503	204,965	191,311	264,471	184,204	1,180,999
(60) Extra Large HLF	585,907	408,648	435,752	464,130	444,260	484,768	436,419	516,500	585,997	630,162	658,213	513,658	6,164,414
(61) Default	6,058	3,408	106	(174)	1,235	981	1,255	2,679	9,958	8,689	9,162	6,638	49,993
(62) Total Throughput	3,975,008	2,372,919	1,485,271	1,167,985	1,266,860	1,148,125	1,254,201	2,214,619	4,644,087	5,748,222	7,127,004	5,385,688	37,789,989