ATTACHMENT C

Exhibit No. TRANSCO-100

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

NEW YORK TRANSCO LLC	**)**	**DOCKET NO. ER26-____-000**

DIRECT TESTIMONY OF
NED W. ALLIS

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I. INTRODUCTION

Q 1. Please state your name and address.

A 1. My name is Ned W. Allis. My business address is 300 Sterling Parkway, Suite 200, Mechanicsburg, Pennsylvania 17055.

Q 2. By whom are you employed and in what capacity?

A 2. I am Sr. Vice President of Gannett Fleming Valuation and Rate Consultants, LLC ("Gannett Fleming"), which is part of the firm GFT Infrastructure. I am responsible for conducting depreciation, valuation and original cost studies, determining service life and salvage estimates, conducting field reviews, presenting recommended depreciation rates to clients, and supporting such rates before state and federal regulatory agencies. I am also responsible for Gannett Fleming's proprietary depreciation software, training of depreciation staff, and the development of solutions for technical issues related to depreciation.

Q 3. How long have you been associated with Gannett Fleming?

A 3. I have been associated with Gannett Fleming since October 2006.

Q 4. Please state your qualifications.

A 4. I have almost 20 years of depreciation experience, which includes expert testimony in more than 100 cases before more than 20 regulatory commissions. In my career, I have worked on hundreds of depreciation assignments, which include assisting other expert witnesses from Gannett Fleming in many additional U.S. jurisdictions and two Canadian provinces. Please refer to Exhibit 101 for additional information on my qualifications, which include cases in which I have testified, my leadership in the Society of Depreciation Professionals (the "Society"), and participation as a faculty member for depreciation training conducted by the Society.

Q 5. On whose behalf are you testifying in this case?

A 5. I am testifying on behalf of New York Transco, LLC ("NY Transco").

II. PURPOSE OF TESTIMONY

Q 6. What is the purpose of your testimony?

A 6. My testimony will support and explain the depreciation study performed for NY Transco's assets. The Depreciation Study sets forth the calculated annual depreciation accrual rates, by account, as of December 31, 2024.

Q 7. Are you sponsoring any exhibits as part of your testimony?

A 7. Yes. I am sponsoring the following exhibits:

Exhibit 101 Qualifications of Ned W. Allis

Exhibit 102 Comparison of Current and Proposed Annual Depreciation Accruals and Rates as of December 31, 2024.

Exhibit 103 Depreciation Study

Q 8. Please summarize your testimony.

A 8. My testimony explains the results, methods and procedures of the Depreciation Study of NY Transco's electric transmission plant in service and will set forth the annual depreciation rates that result from the Study. Such rates are based on the most commonly used methods and procedures for determining depreciation rates. The service life and net salvage parameters are based on widely used methods. The depreciation rates are based on the average service life procedure, remaining life technique, and straight line method. The estimates of service life for each depreciable

plant account are based on the life span method, which is commonly used for electric transmission assets.

III. DEPRECIATION STUDY

Q 9. How is the concept of depreciation defined?

A 9. FERC and the American Institute of Certified Public Accountants ("AICPA") provide two commonly used definitions for depreciation.

> *Depreciation*, as applied to depreciable electric plant, means the loss in service value not restored by current maintenance, incurred in connection with the consumption or prospective retirement of electric plant in the course of service from causes which are known to be in current operation and against which the utility is not protected by insurance. Among the causes to be given consideration are wear and tear, decay, action of the elements, inadequacy, obsolescence, changes in the art, changes in demand and requirements of public authorities.[1]

The AICPA defines depreciation as:

> Depreciation accounting is a system of accounting which aims to distribute cost or other basic value of tangible capital assets, less salvage (if any) over the estimate useful life of the unit (which may be a group of assets) in a systematic and rational manner. It is a process of allocation, not of valuation. Depreciation for the year is the portion of the total charge under such a system that is allocated to the year. Although the allocation may properly take into account occurrences during the year, it is not intended to be a measurement of the effect of all such occurrences.[2]

Q 10. Did you prepare the Depreciation Study submitted by NY Transco in this proceeding?

A 10. Yes. I prepared the depreciation study of NY Transco's electric transmission plant,

[1] 18 C.F.R. Part 101 (FERC Uniform System of Accounts), Definition 12.
[2] Accounting Research and Terminology Bulletin #1, AICPA, p. 25. (Emphasis added).

which is provided as Exhibit 103.

Q 11. In completing the Depreciation Study, did you follow generally accepted practices in the field of depreciation?

A 11. Yes.

Q 12. Please summarize the results of the Study.

A 12. The results of the Depreciation Study are summarized by plant function in the table below which sets forth the original cost and recommended annual depreciation rates and accruals based on electric plant in service as of December 31, 2024. A table summarizing the results by plant account can be found on page VI-4 of the Study.

Table 1: Summary of Original Cost, Proposed Depreciation Rates and Amounts as of December 31, 2024

FUNCTION	ORIGINAL COST ($, MILLIONS)	DEPRECIATION RATE	DEPRECIATION AMOUNT ($, MILLIONS)
Intangible Plant	238,679.3	2.33	5,557.7
Transmission Plant	657,749.1	2.23	14,681.9
General Plant	2,169.3	7.20	0.2
Total Electric Plant	**898,597.7**	**2.27**	**20,395.6**

Q 13. What are the components of the Depreciation Study?

A 13. The Depreciation Study is presented in eight parts: Part I (Introduction) presents the scope and basis for the Depreciation Study. Part II (Estimation of Survivor Curves) includes descriptions of the methodology of estimating survivor curves. Part III (Service Life Considerations) and Part IV (Net Salvage Considerations) set forth the process for determining service life and net salvage estimates. Part V (Calculation of Annual and Accrued Depreciation) includes the concepts of depreciation and

amortization using the remaining life. Part VI (Results of Study) presents a description of the results of my analysis and a summary of the depreciation calculations. Part VI also presents in Table 1 (see Part VI, page VI-4) the survivor curve, the net salvage percent, the original cost as of December 31, 2024, the book depreciation reserve, and the calculated annual depreciation accrual and rate for each account or subaccount. Parts VII (Service Life Statistics) and VIII (Detailed Depreciation Calculations) include graphs that relate to the service life estimates and the detailed depreciation calculations by account.

Q 14. How did you perform your Depreciation Study?

A 14. For the depreciation rates, I used the straight line remaining life method of depreciation, also referred to as the straight line method and remaining life technique, with the average service life procedure. The annual depreciation is based on a method of depreciation accounting that seeks to distribute the unrecovered cost of fixed capital assets over the estimated remaining useful life of each unit, or group of assets, in a systematic and rational manner.

For the amortization of General Plant accounts, I used the straight line remaining life method of amortization. The annual amortization is based on amortization accounting that distributes the unrecovered cost of fixed capital assets over the remaining amortization period selected for each account and vintage.

Q 15. How did you determine the recommended annual depreciation accrual rates?

A 15. I did this in two phases. In the first phase, I estimated the service life and net salvage characteristics for each depreciable group – that is, each plant account or subaccount

identified as having similar characteristics. In the second phase, I calculated the composite remaining lives and annual depreciation accrual rates based on the service life and net salvage estimates determined in the first phase.

Q 16. Please further describe the first phase of the Depreciation Study, in which you estimated the service life and net salvage characteristics for each depreciable group.

A 16. The service life and net salvage study consisted of compiling original cost data from NY Transco's records; obtaining information from NY Transco's management and operating personnel concerning practices and plans as they relate to plant operations; and interpreting the data and the estimates used by other electric utilities to form judgments of average service life and net salvage characteristics.

Since NY Transco's assets consist primarily of new assets, there is limited historic transactional data available with which statistical life or net salvage analyses can be conducted. The recommended service life and net salvage estimates primarily incorporate information obtained on site visits and in meetings with NY Transco personnel, insight from our experience performing studies for other New York companies, and consideration of the estimates of other electric utilities for similar facilities.

Q 17. What are "Iowa-type survivor curves" and how did you use such curves to estimate the service life characteristics for each property group?

A 17. Iowa-type survivor curves (Iowa curves) are the industry standard system of survivor curves that contain the range of survivor characteristics usually experienced by utilities

and other industrial companies. Such curves were developed at the Iowa State College Engineering Experiment Station through an extensive process of observing and classifying the ages at which various types of property used by utilities and other industrial companies had been retired.

Iowa curves are used to estimate the service lives of groups of property, as they accurately describe the dispersion of service lives within the group. When historical data are available for analysis, Iowa curves are used to smooth and extrapolate original survivor curves determined by the retirement rate method. Iowa curves are also used for service life estimates when more limited data are available. The Iowa curves used in the Depreciation Study are estimated based on the type of property and the curve estimates used by other companies for similar assets. The estimated survivor curve designations for each depreciable property group indicate the average service life, the family within the Iowa curve system to which the property group belongs, and the relative height of the mode. For example, the Iowa curve 50-R2, indicates an average service life of 50 years; a right-moded, or R, type curve;[3] and a moderate height, 2, for the mode.[4] Iowa curves are described in more detail in Part II of Exhibit 103.

Q 18. Did you physically observe NY Transco's plant and equipment as part of your Depreciation Study?

A 18. Yes. In September 2025, I made a field review of a sampling of NY Transco's assets. Field reviews are conducted to become familiar with a company's operations and obtain

[3] The mode occurs after average life for right-moded curves.
[4] Possible modes for R type curves range from 0.5 to 5.

an understanding of the function of the plant and information with respect to the reasons for past retirements and the expected future causes of retirements. Such knowledge, as well as information from discussions with NY Transco's management and operating personnel, was incorporated in the estimation of depreciation parameters.

Q 19. How did your experience in development of other depreciation studies affect your work in this case for NY Transco?

A 19. Because my firm, Gannett Fleming, customarily conducts field reviews for depreciation studies, I have had the opportunity to visit similar facilities and meet with operations personnel at many other companies. The knowledge I have accumulated from those visits and meetings provides me with useful information to draw upon to incorporate into the informed judgment used to estimate service lives and net salvage.

Q 20. What is the concept of "net salvage"?

A 20. Net salvage is a component of the service value of capital assets recovered through depreciation rates. The service value of an asset is its original cost less its net salvage. Net salvage is the salvage value received for the asset upon retirement less the cost to retire the asset. When the cost to retire the asset exceeds the salvage value, the result is negative net salvage.

Because depreciation expense is the loss in service value of an asset during a defined period (e.g., one year), it must include a ratable portion of both the original cost of the asset and the net salvage. That is, the net salvage related to an asset should be incorporated in the cost of service during the same period as its original cost, so that customers receiving service from the asset pay rates that include a portion of both

elements of the asset's service value, the original cost, and the net salvage value. For example, the full service value of a $1 million section of overhead conductor may also include $220,000 of removal cost and $20,000 in gross salvage, for a total service value of $1.2 million.

Q 21. Is the inclusion of net salvage in depreciation consistent with Commission precedent?

A 21. Yes. Definition 12B of the Commission's Uniform System of Accounts refers to depreciation as the "loss in service value." Definition 37 of the Uniform System of Accounts defines service value as "the difference between original cost and net salvage value of electric plant." Thus, the Uniform System of Accounts requires that net salvage, as a portion of the service value of an asset, is included in depreciation. Accordingly, net salvage has typically been included in depreciation studies before the Commission.

Q 22. How did you estimate net salvage percentages?

A 22. While net salvage estimates typically incorporate the analysis of historical net salvage data, such data were not available for the Company. As a result, the net salvage percentages in the Depreciation Study are based on the outlook for the facilities and the estimates for other electric transmission facilities.

Q 23. Please further describe the second phase of the process that you used in the Depreciation Study, in which you calculated composite remaining lives and annual depreciation accrual rates.

A 23. After I estimated the service life and net salvage characteristics for each depreciable property group, I calculated the annual depreciation accrual rates for each group using

the straight line remaining life method and using remaining lives weighted consistent with the average service life procedure. The calculation of annual depreciation accrual rates was developed as of December 31, 2024.

Q 24. What is the straight line remaining life method of depreciation?

A 24. The straight line remaining life method of depreciation allocates the original cost of the property, less future net salvage, less accumulated depreciation, in equal amounts to each year of remaining service life.

Q 25. What is the average service life procedure for calculating remaining life accrual rates?

A 25. The average service life procedure defines the group or account for which the remaining life annual accrual is determined. Under this procedure, the annual accrual rate is determined for the entire group or account based on its average remaining life. The rate is then applied to the surviving balance of the group's cost. The average remaining life of the group is calculated by first dividing the future book accruals – original cost less allocated book reserve less future net salvage – by the average remaining life for each vintage. The average remaining life for each vintage is derived from the area under the survivor curve between the attained age of the vintage and the maximum age. The sum of the future book accruals is then divided by the sum of the annual accruals to determine the average remaining life of the entire group for use in calculating the annual depreciation accrual rate.

Q 26. What is amortization accounting, in contrast to depreciation accounting?

A 26. Amortization accounting is used for accounts with a large number of units, but relatively small asset values. In amortization accounting, units of property are capitalized in the

same manner as they are in depreciation accounting. However, depreciation accounting is difficult for these types of assets because depreciation accounting requires periodic inventories to properly reflect plant in service. Consequently, amortization accounting is used for these types of assets, such that retirements are recorded when a vintage is fully amortized rather than as the units are removed from service. That is, there is no dispersion of retirement in amortization accounting. All units are retired when the age of the vintage reaches the amortization period. Each plant account or group of assets is assigned a fixed period that represents an anticipated life during which the asset will render full benefit. For example, in amortization accounting, assets that have a 10-year amortization period will be fully recovered after 10 years of service and taken off a company's books at that time, although such assets may not necessarily be physically removed from service. In contrast, assets that are physically taken out of service before 10 years remain on the books until the amortization period for that vintage has expired.

Q 27. Is amortization accounting proposed for certain plant accounts?

A 27. Yes. Amortization accounting is proposed for all general plant accounts except Accounts 390, 392 and 396. The total original cost of plant subject to amortization accounting, which includes assets such as furniture, computers and stores equipment, comprises a small percentage of plant in service for NY Transco.

Q 28. What do you recommend for depreciation rates for contributed property?

A 28. For electric transmission property owned by others for which the Company has paid for, I recommend the use of the weighted average depreciation rate for transmission plant. This approach is consistent with the treatment currently used for this type of property, but the depreciation rate has been updated to correspond with the recommendations in

the Depreciation Study.

Q 29. Please provide an example to illustrate how the annual depreciation accrual rate for a particular group of property is presented in your Depreciation Study.

A 29. As an example, consider Account 353, Station Equipment. An 45-R1 interim survivor curve and a net salvage percent of negative 15 percent are estimated for this account. The calculation of the annual depreciation related to the original cost of electric plant as of December 31, 2024 is presented in Part VIII on page VIII-5 of the Depreciation Study. The calculation is based on the 45-R1 interim survivor curve, negative 15 percent net salvage, the attained age, and the allocated book reserve. The tabulation sets forth the installation year, the original cost, calculated accrued depreciation, allocated book reserve, future accruals, remaining life, and annual accrual. These totals are brought forward to the table in Part VI on page VI-4 of the Depreciation Study.

Q 30. What is the overall impact of the depreciation rates recommended in the Depreciation Study?

A 30. The overall impact reflected in the Depreciation Study is an increase in depreciation expense of approximately $1,442,122 as of December 31, 2024, as shown in Exhibit 102. The increase in depreciation expense is primarily due to plant investment. The proposed depreciation rates do not vary significantly from the rates in current use.

Q 31. Does this conclude your direct testimony?

A 31. Yes.

EXHIBIT 101

NED W. ALLIS

LIST OF QUALIFICATIONS

Q. Please state your name.

A. My name is Ned W. Allis.

Q. What is your educational background?

A. I have a Bachelor of Science degree in Mathematics from Lafayette College in Easton, PA.

Q. Do you belong to any professional societies?

A. Yes. I am a member and past President of the Society of Depreciation Professionals ("Society") and an associate member of the American Gas Association/Edison Electric Institute Industry Accounting Committee. I also serve on the faculty for training offered by the Society and am an instructor for the Society's "Introduction to Depreciation," "Life and Net Salvage Analysis," "Analyzing the Life of Real-World Property," "Analyzing Net Salvage in the Real World" and "Depreciation and Ratemaking Issues" courses.

Q. Do you hold any special certification as a depreciation expert?

A. Yes. The Society of Depreciation Professionals has established national standards for depreciation professionals. The Society administers an examination to become certified in this field. I passed the certification exam in September 2011 and was recertified in March 2017 and January 2022.

Q. Please outline your experience in the field of depreciation.

A. I joined Gannett Fleming in October 2006 as an analyst. My responsibilities included assembling data required for depreciation studies, conducting statistical analyses of service life and net salvage data, calculating annual and accrued depreciation, and assisting in preparing reports and testimony setting forth and defending the results of the studies. I

also developed and maintained Gannett Fleming's proprietary depreciation software. In March 2013, I was promoted to the position of Supervisor of Depreciation Studies. In March 2017, I was promoted to Project Manager, Depreciation and Technical Development. In January 2019, I was promoted to the position of Vice President. In November, 2025 I was promoted to my current position of Sr. Vice President.

In my current position, I am responsible for conducting depreciation, valuation and original cost studies, determining service life and salvage estimates, conducting field reviews, presenting recommended depreciation rates to clients, and supporting such rates before state and federal regulatory agencies. I am also responsible for Gannett Fleming's proprietary depreciation software, training of depreciation staff, and the development of solutions for technical issues related to depreciation. Since joining Gannett Fleming, I have worked on more than one hundred depreciation assignments.

Q. Have you submitted testimony to any state utility commission on the subject of utility plant depreciation?

A. Yes. I have submitted testimony on depreciation related topics to the California Public Utilities Commission, Connecticut Public Utilities Regulatory Authority, District of Columbia Public Service Commission, Delaware Public Service Commission, Florida Public Service Commission, the Illinois Commerce Commission, Kansas Corporation Commission, Maryland Public Service Commission, Massachusetts Department of Public Utilities, Maine Public Utilities Commission, Missouri Public Service Commission, Nevada Public Utilities Commission, New Hampshire Public Utilities Commission, New Jersey Board of Public Utilities, New York Public Service Commission, Rhode Island Public Utilities Commission, Tennessee Public Utility Commission, Virginia State Corporation Commission, the Washington Utilities and Transportation Commission, and

the Alberta Utilities Commission. I have also testified before the Federal Energy Regulatory Commission ("FERC").

Q. Have you had any additional education relating to utility plant depreciation?

A. Yes. I have completed the following courses conducted by the Society: "Depreciation Basics," "Life and Net Salvage Analysis" and "Preparing and Defending a Depreciation Study."

Q. Does this conclude your qualification statement?

A. Yes.

LIST OF CASES IN WHICH NED W. ALLIS SUBMITTED TESTIMONY

	Year	Jurisdiction	Docket No.	Client/Utility	Subject
01.	2013	NV	13-06004	Sierra Pacific Power Company	Depreciation
02.	2013	NY	13-E-0030, 13-G-0031 & 13-S-0032	Consolidated Edison Company of New York	Depreciation
03.	2013	DC	Case No. 1103	Pepco	Depreciation
04.	2014	NY	14-G-0494	Orange and Rockland - Gas	Depreciation
05.	2014	NY	14-E-0493	Orange and Rockland - Electric	Depreciation
06.	2014	NY	15-E-0050	Consolidated Edison Company of New York - Electric	Depreciation
07.	2015	FERC	ER15-2294-000	Pacific Gas & Electric Company TO17	Depreciation
08.	2015	NY	16-E-0060	Consolidated Edison Company of New York - Electric	Depreciation
09.	2015	NY	16-G-0061	Consolidated Edison Company of New York - Gas	Depreciation
10.	2016	FL	160021-EI	Florida Power & Light Company	Depreciation
11.	2016	NV	16-06008	Sierra Pacific Power Company - Electric	Depreciation
12.	2016	NV	16-06009	Sierra Pacific Power Company - Gas	Depreciation
13.	2016	NJ	ER 16050428	Rockland Electric Company	Depreciation
14.	2016	FERC	ER16-2320-000	Pacific Gas & Electric Company – Electric Transmission	Depreciation
15.	2016	DC	Case No. 1139	Pepco	Depreciation
16.	2017	NV	17-06004	Nevada Power Company	Depreciation
17.	2017	FERC	ER17-2154-000	Pacific Gas & Electric Company – Electric Transmission	Depreciation
18.	2017	CT	17-10-46	Connecticut Light & Power	Depreciation
19.	2017	CA	A.17-11-009	Pacific Gas & Electric – Gas Transmission and Storage	Depreciation
20.	2017	RI	4770	Narragansett Electric Company	Depreciation
21.	2017	DC	Case No. 1150	Pepco	Depreciation
22.	2018	CT	18-05-10	Yankee Gas Services Company	Depreciation
23.	2018	NY	18-E-0067	Orange and Rockland – Electric	Depreciation
24.	2018	NY	18-G-0068	Orange and Rockland – Gas	Depreciation
25.	2018	NJ	ER18080925	Atlantic City Electric Company	Depreciation
26.	2018	FERC	ER19-13-000	Pacific Gas & Electric Company – Electric Transmission	Depreciation
27.	2018	FERC	ER19-284-000	Florida Power & Light Company	Depreciation
28.	2018	CA	A. 18-12-009	Pacific Gas & Electric Company	Depreciation

	Year	Jurisdiction	Docket No.	Client/Utility	Subject
29.	2018	NY	19-E-0065	Consolidated Edison Company of New York - Electric	Depreciation
30.	2018	NY	19-G-0065	Consolidated Edison Company of New York - Gas	Depreciation
31.	2019	MA	D.P.U. 18-150	Massachusetts Electric Company	PBR / Depreciation
32.	2019	MD	9610	Baltimore Gas & Electric Company	Depreciation
33.	2019	KS	19-ATMG-525-RTS	Atmos Energy	Depreciation
34.	2019	MA	D.P.U. 19-130	Fitchburg Gas and Electric Light Company d/b/a Unitil (Electric Division)	Depreciation
35.	2019	MA	D.P.U. 19-131	Fitchburg Gas and Electric Light Company d/b/a Unitil (Gas Division)	Depreciation
36.	2020	FERC	ER21-83-000	Pepco	Depreciation
37.	2020	MA	D.P.U. 20-120	Boston Gas Company	Depreciation
38.	2020	FERC	ER20-2878-00	PG&E – Wholesale Distribution	Depreciation
39.	2020	NH	DW 20-184	Aquarion Water Company	Depreciation
40.	2021	FERC	RP21-100-000	National Grid Liquified Natural Gas	Depreciation
41.	2021	FL	20210016-EI	Duke Energy Florida	Depreciation
42.	2021	NY	21-E-0074	Orange and Rockland – Electric	Depreciation
43.	2021	NY	21-G-0073	Orange and Rockland – Gas	Depreciation
44.	2021	NH	DE 21-030	Until Energy Systems, Inc.	Depreciation
45.	2021	FL	20210015-EI	Florida Power & Light Company	Depreciation
46.	2021	FERC	ER21-1822-000	GridLiance High Plains	Depreciation
47.	2021	NH	DG 21-104	Northern Utilities, Inc.	Depreciation
48.	2021	NJ	ER2105823	Rockland Electric Company	Depreciation
49.	2021	MD	9670	Delmarva Power and Light	Depreciation
50.	2021	CA	A. 21-06-021	Pacific Gas & Electric Company	Depreciation
51.	2021	FERC	ER22-306	Duke Energy Florida	Depreciation
52.	2021	FERC	ER22-2-000	ITC Transmission	Depreciation
53.	2021	FERC	ER22-3-000	ITC Midwest	Depreciation
54.	2021	FERC	ER22-4-000	Michigan Electric Transmission Company	Depreciation
55.	2022	NY	22-E-0064	Consolidated Edison Company of New York - Electric	Depreciation
56.	2022	NY	22-G-0065	Consolidated Edison Company of New York - Gas	Depreciation
57.	2022	WA	UE-220066 / UG-22067	Puget Sound Energy	Depreciation

	Year	Jurisdiction	Docket No.	Client/Utility	Subject
58.	2022	MD	9680	Columbia Gas of Maryland	Depreciation
59.	2022	FERC	ER-22-1195-000	Alabama Power Company	Depreciation
60.	2022	FERC	ER-22-1196-000	Southern Electric Generating Company	Depreciation
61.	2022	FERC	ER-20-2411-002, et al	Tri-State Generation and Transmission Association	Depreciation
62.	2022	CT	22-07-01	Aquarion Water Company of Connecticut	Depreciation
63.	2022	FL	20220069-GU	Florida City Gas	Depreciation
64.	2022	NV	22-06015, 22-06016	Sierra Pacific Power Company	Depreciation
65.	2022	FERC	ER22-2200	Atlantic City Electric Company	Depreciation
66.	2022	FERC	ER22-2201	Delmarva Power & Light	Depreciation
67.	2022	MO	WR-2023-0006	CSWR, LLC	Depreciation
68.	2022	MD	Case No. 9680	Columbia Gas of Maryland, Inc.	Depreciation
69.	2023	IL	23-0055	Commonwealth Edison	Depreciation
70.	2023	NY	22-S-0659	Consolidated Edison Company of New York – Steam	Depreciation
71.	2023	MD	9692	Baltimore Gas & Electric Company	Depreciation
72.	2023	DC	Case No. 1176	Pepco	Depreciation
73.	2023	NY	23-G-0225	National Grid – Brooklyn Union Gas	Depreciation
74.	2023	NY	23-G-0226	National Grid – KeySpan Gas East Corp.	Depreciation
75.	2023	ME	2023-00051	Northern Utilities	Depreciation
76.	2023	VA	PUR-2023-00008	Atmos Energy Corporation	Depreciation
77.	2023	TN	23-00050	Atmos Energy Corporation	Depreciation
78.	2023	MA	D.P.U. 23-80	Fitchburg Gas and Electric Light Company d/b/a Unitil (Electric Division)	Depreciation
79.	2023	MA	D.P.U. 23-81	Fitchburg Gas and Electric Light Company d/b/a Unitil (Gas Division)	Depreciation
80.	2023	MD	Case No. 9701	Columbia Gas of Maryland, Inc.	Depreciation
81.	2023	MD	Case No. 9702	Pepco	Depreciation
82.	2023	NV	23-06008	Nevada Power Company	Depreciation
83.	2023	FERC	ER23-___-000	ITC Great Plains LLC	Depreciation
84.	2023	CT	23-11-02	Connecticut Natural Gas Corporation	Depreciation
85.	2023	CT	23-11-02	The Southern Connecticut Gas Company	Depreciation
86.	2023	MA	D.P.U. 23-150	National Grid – Massachusetts Electric	Depreciation
87.	2023	FERC	ER24-96	Pacific Gas and Electric Company – TO21	Depreciation

	Year	Jurisdiction	Docket No.	Client/Utility	Subject
88.	2023	FERC	ER24-754	Baltimore Gas & Electric Company	Depreciation
89.	2023	CA	A. 23-05-010	Southern California Edison	Depreciation
90.	2024	WA	UG-240005	Puget Sound Energy	Depreciation
91.	2024	NY	24-E-0060	Orange and Rockland – Electric	Depreciation
92.	2024	NY	24-G-0061	Orange and Rockland – Gas	Depreciation
93.	2024	NY	24-G-0323	Niagara Mohawk - Electric	Depreciation
94.	2024	NY	24-E-0322	Niagara Mohawk – Gas	Depreciation
95.	2024	FL	20240025-EI	Duke Energy Florida	Depreciation
96.	2024	FL	20240026-EI	Tampa Electric Company	Depreciation
97.	2024	HI	2024-0158	The Gas Company	Depreciation
98.	2024	HI	2024-0199	Hawaiian Electric Company	Depreciation
99.	2024	FERC	24-04-10	Honeoye Storage Corporation	Depreciation
100.	2024	MS	2024-UN-___	Mississippi Power Company	Depreciation
101.	2024	DE	24-1044	Delmarva Power & Light – Gas	Depreciation
102.	2024	CT	24-12-01	Eversource Energy – Yankee Gas	Depreciation
103.	2024	KY	2024-00276	Atmos Energy	Depreciation
104.	2024	NY	24-G-0668	Liberty Utilities (St. Lawrence Gas) Corp.	Depreciation
105	2025	FERC	RP25-473-000	National Grid Liquified Natural Gas	Depreciation
106.	2025	NY	25-E-0072	Consolidated Edison Company of New York - Electric	Depreciation
107.	2025	NY	25-G-0073	Consolidated Edison Company of New York - Gas	Depreciation
108.	2025	FL	20250011-EI	Florida Power & Light Company	Depreciation/ Decommissioning
109.	2025	NH	DE 25-025	Unitil Energy Services	Depreciation
110.	2025	AB	29879	AltaLink	Depreciation
111.	2025	MA	D.P.U. 25-85	Liberty Utilities – New England Natural Gas	Depreciation
112.	2025	CA	A.25-05-009	Pacific Gas & Electric Company	Depreciation
113.	2025	NJ	ER25060374	Rockland Electric Company	Depreciation
114.	2025	NY	25-S-0741	Consolidated Edison Company of New York - Steam	Depreciation

EXHIBIT 102

NEW YORK TRANSCO LCC
ELECTRIC ASSETS

COMPARISON OF CURRENT AND PROPOSED ANNUAL DEPRECIATION ACCRUALS AND RATES
AS OF DECEMBER 31, 2024

				CURRENT		PROPOSED				
		ORIGINAL COST AS OF	BOOK DEPRECIATION	ANNUAL DEPRECIATION		SURVIVOR	NET SALVAGE	ANNUAL DEPRECIATION		INCREASE/
	ACCOUNT	DECEMBER 31, 2024	RESERVE	ACCRUAL	RATE	CURVE	PERCENT	ACCRUAL	RATE	DECREASE
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
	ELECTRIC PLANT									
	INTANGIBLE PLANT									
303.10	MISCELLANEOUS INTANGIBLE PLANT	236,639,705.52	28,862,400	4,922,106	2.08	*	0	5,277,065	2.23	354,960
303.20	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE	2,039,564.77	1,440,722	280,599	**	5-SQ	0	280,599	**	0
	TOTAL INTANGIBLE PLANT	**238,679,270.29**	**30,303,122**	**5,202,705**	**2.18**			**5,557,664**	**2.33**	**354,960**
	TRANSMISSION PLANT									
350.10	LAND RIGHTS	39,916,963.50	1,717,297	407,153	1.02	80-R4	0	505,133	1.27	97,980
352.00	STRUCTURES AND IMPROVEMENTS	1,850,000.00	292,396	37,925	2.05	65-R2	(15)	31,788	1.72	(6,137)
353.00	STATION EQUIPMENT	197,644,141.05	9,381,210	4,466,758	2.26	45-R1	(15)	5,052,462	2.56	585,704
354.00	TOWERS AND FIXTURES	303,802,969.67	13,326,124	6,197,581	2.04	65-R3	(40)	6,614,511	2.18	416,930
355.00	POLES AND FIXTURES	-			2.24	65-R3	(40)		2.15	
356.00	OVERHEAD CONDUCTORS AND DEVICES	114,535,019.02	12,115,682	2,542,677	2.22	65-R3	(40)	2,477,965	2.16	(64,712)
357.00	UNDERGROUND CONDUIT	-			2.05	50-R3	(5)		2.10	
358.00	UNDERGROUND CONDUCTOR AND DEVICES	-			2.39	50-R3	(10)		2.20	
359.00	ROADS AND TRAILS	-			1.17	65-R3	0		1.54	
	TOTAL TRANSMISSION PLANT	**657,749,093.24**	**36,832,709**	**13,652,094**	**2.08**			**14,681,859**	**2.23**	**1,029,765**
	GENERAL PLANT									
390.00	STRUCTURES AND IMPROVEMENTS	-			3.36	50-R2	(20)		2.40	
	OFFICE FURNITURE AND EQUIPMENT									
391.10	EQUIPMENT	-			5.24	5-SQ	0		20.00	
391.20	FURNITURE	-			5.24	20-SQ	0		5.00	
392.00	TRANSPORTATION EQUIPMENT	-			9.78	8-L2.5	5		11.88	
393.00	STORES EQUIPMENT	-			3.91	20-SQ	0		5.00	
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	-			4.68	25-SQ	0		4.00	
395.00	LABORATORY EQUIPMENT	-			3.75	20-SQ	0		5.00	
396.00	POWER OPERATED EQUIPMENT	-			7.62	15-L2.5	5		6.33	
397.00	COMMUNICATION EQUIPMENT	-			3.82	15-SQ	0		6.67	
398.00	MISCELLANEOUS EQUIPMENT	2,169,328.44	120,595	98,704	4.55	15-SQ	0	156,101	7.20	57,397
	TOTAL GENERAL PLANT	**2,169,328.44**	**120,595**	**98,704**	**4.55**			**156,101**	**7.20**	**57,397**
	TOTAL DEPRECIABLE ELECTRIC PLANT	**898,597,691.97**	**67,256,425**	**18,953,503**				**20,395,624**		**1,442,122**
	NONDEPRECIABLE PLANT									
350.20	LAND	7,090,222.81								
	TOTAL ELECTRIC PLANT	**905,687,914.78**								

* THIS ACCOUNT WILL USE THE COMPOSITE DEPRECIATION RATE DETERMINED FOR TRANSMISSION PLANT.
** ASSETS IN THIS ACCOUNT ARE DEPRECIATED BASED ON ESTIMATED LIFE.