

Attachment D

New York Transco LLC

Attachment 11b - Excess & Deficient ADIT

		Deferred Tax Asset (Liability) (Notes A & B)			ADIT Offset to P&L (Note B)	(Excess) Deficient Deferred Income Taxes (Note B & C)	(Excess) Deficient Deferred Income Tax Activity post [INSERT NAME OF TAX LAW]						Protected / Unprotected
Book-Tax Temporary Difference	Gross Accumulated Schedule M Adjustment (Prior to [INSERT NAME OF TAX LAW]) (Note G)	[INSERT DATE] ADIT Balance (Prior to [INSERT NAME OF TAX LAW])	[INSERT DATE] ADIT Balance (After [INSERT NAME OF TAX LAW])	Change in ADIT due to [INSERT NAME OF TAX LAW]	Tax Expense (Benefit)	ADIT Offset to Regulatory Asset (Liability)	Other Adjustments Including Gross-up True-ups	[INSERT DATE] Return-to- Accrual Adjustment (Recorded in [INSERT DATE])	[INSERT DATE] Amortization (Note D & E)	[INSERT DATE] Return-to- Accrual Adjustment (Recorded in [INSERT DATE])	[INSERT DATE] Amortization (Note D & E)	[INSERT DATE] Ending Balance (Note F)	

**Non-Property Related
Items:**

190 Accounts

Federal NOL
Overcollection
of Revenues
Carrying
Charge on
Overcollection
of Revenues
Unearned TCC
Revenue
Preformation
Costs

Total For 190
Accounts:

282 Accounts

None

Total For 282
Accounts:

283 Accounts

Carrying Charge
on
Preformation
Costs
Prepaid
Expenses
Gross-up on
AFUDC

Total For 283
Accounts:

Total Non-Property Related Items:										
Net (Excess) Deficient Deferred Income Taxes (excluding Gross-up)										
Net Tax Gross-up										
Net (Excess) Deficient Deferred Income Taxes (including Gross-up)										

Property Related Items:

190 Accounts											
None	-	-	-	-	-	-	-	-	-	-	
Total For 190 Accounts:	-	-	-	-	-	-	-	-	-	-	
282 Accounts											
Normalized Federal Timing Differences											
Normalized State and Local Timing Differences, Net of Federal											
AFUDC Equity-Federal											
AFUDC Equity-State and Local, net of Federal											
Total For 282 Accounts:											

Total Property Related Items:

Net (Excess) Deficient Deferred Income Taxes (excluding Gross-up)	-									
Net Tax Gross-up										

Net (Excess) Deficient Deferred Income Taxes (including Gross-up)								
	-				-	-	-	
Total Property and Non- property Related Items:								
Net (Excess) Deficient Deferred Income Taxes (excluding Gross-up)			-		-	-	-	
Net Tax Gross- up	-				-	-	-	
Net (Excess) Deficient Deferred Income Taxes (including Gross-up)	-				-	-	-	

Notes:

- A [INSERT DATE] ADIT Balances above do not reflect Gross-up on Excess Deferred Income Tax
- B Upon a tax rate change (federal, state and/or, if applicable, state apportionments), the Company remeasures its deferred tax assets and liabilities to the new applicable corporate tax rate. For schedule M items not directly taken to the P&L, the result of this remeasurement is a change to the net deferred tax assets/liabilities recorded in accounts 190, 282, and 283 with a corresponding change in regulatory assets (account 182.3) and regulatory liabilities (account 254) to reflect the return of/collection from excess/deficient deferred taxes to/from customers. Within the FERC Form 1, deficient and excess ADITs in Account 182.3 and Account 254, respectively are presented grossed-up for tax purposes. For ratemaking purposes, these grossed-up balances are treated as FAS109 and subsequently removed from rate base, thereby ensuring rate base neutrality for tax rate changes. The Company would follow the process described above to remeasure ADIT balances (increase or decrease) due to any future income tax rate change.
- C Reflects the end of [INSERT YEAR] balance, as reflected on FERC Form No. 1, pages 232 (Account 182.3) and 278 (Account 254)
- D The amortization periods shall be consistent with the following:
Protected Property & Non-Property will be amortized using the Adjusted Rate Assumption Methodology (ARAM)
Unprotected federal net operating loss will be amortized on a straight-line basis over ten years.
Unprotected Property & Non-Property will be amortized on a straight-line basis over seven years.
- E The amortization will occur through FERC income statement Accounts 410.1. and 411.1, [INSERT APPROPRIATE PERIOD, IF APPLICABLE].
- F Ending balance of year is the end of [INSERT YEAR] balance, as reflected on FERC Form No. 1, pages 232 (Account 182.3) and 278 (Account 254)
- G Amount represent the cumulative gross Schedule M amount at the time of the revaluation due to a tax law change.