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Thursday, December 23, 2010

Ontario Energy Board  
P.O. Box 2319, 27<sup>th</sup> Floor  
2300 Yonge Street  
Toronto, ON  
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Attention: Kristen Walli, Board Secretary

Dear Ms. Walli:

**Re: North Bay Hydro Distribution Ltd. (EB-2010-0102)**  
**Application for 2011 Electricity Distribution Rates**  
**Responses Board Staff Interrogatories**

Please find attached a complete copy of the Board Staff's interrogatory responses.

Two hard copies of this submission will be sent via courier. An electronic copy of the response in PDF format will be submitted through the Ontario Energy Board's RESS.

An electronic copy of the response in PDF format will be forwarded via email to the Intervenor as follows:

Donald Rennick

a) Donald Rennick, Independent Participant

Vulnerable Energy Consumers Coalition

a) Michael Buonaguro, Public Interest Advocacy Centre

b) William Harper, Econalysis Consulting Services Inc.

Yours truly,

*Original signed by*

Todd Wilcox,  
C.O.O.  
North Bay Hydro Distribution Limited  
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# BOARD STAFF INTERROGATORIES NORTH BAY HYDRO DISTRIBUTION LTD. EB-2010-0102

## RTSR ADJUSTMENTS

### Board Staff Interrogatory No. 1

Ref: 2011 IRM3 RTSR Adjustment Workform

Sheet "B1.2 - 2009 Distributor Billing Determinants" of the 2011 IRM3 RTSR Adjustment Workform is reproduced below.

|                           |    |
|---------------------------|----|
| Loss Adjusted Metered kWh | No |
| Loss Adjusted Metered kW  | No |

| Rate Class                        | Vol Metric | Metered kWh | Metered kW | Applicable Loss Factor | Load Factor       |
|-----------------------------------|------------|-------------|------------|------------------------|-------------------|
|                                   |            | A           | B          | C                      | D = A / (B * 730) |
| Residential                       | kWh        | 226,669,714 | 0          | 1.0387                 |                   |
| General Service Less Than 50 kW   | kWh        | 92,227,314  | 0          | 1.0387                 |                   |
| General Service 50 to 2,999 kW    | kW         | 219,115,319 | 527,585    |                        | 56.92%            |
| General Service 3,000 to 4,999 kW | kW         | 38,677,776  | 70,695     |                        | 74.99%            |
| Unmetered Scattered Load          | kWh        | 329,048     | 0          | 1.0387                 |                   |
| Sentinel Lighting                 | kW         | 586,835     | 1,464      |                        | 54.95%            |
| Street Lighting                   | kW         | 3,450,728   | 9,284      |                        | 50.95%            |
| Total                             |            | 581,056,732 | 609,027    |                        |                   |

Preamble: The current tariff sheet cites a total loss factor – secondary metered customer < 5000 kW of 1.048.

a) Board staff has been unable to verify the data entered in Columns A & B. Please provide supporting evidence.

### Response:

Per the 2011 RTSR Adjustment Workform Instructions for Sheet B1.2, NBHDL obtained the kWh totals (billing determinants) from the RRR quarterly filings for January through December 2009. These filings were submitted as follows: Q1 2009 – revised submission July 31, 2009, Q2 2009 submitted July 31, 2009, Q3 2009 submitted November 27, 2009, and Q4 2009 submitted February 25, 2010. It should be noted that NBHDL referenced filing form 2.1.3 and summed both the "Energy Sales for Distributor" and "Energy Sales for the Retailer" in determining the total kWh of 581,056,732. For reference, NBHDL has attached a summary of the quarterly and year end totals by class and retailer in Appendix "A".

Q4 2009 was the first time the Board requested that the USL class be separate within the RRR filing; NBHDL had previously included the kWh for this class in the GS<50 kW

class. For the purposes of calculating appropriate rates for RTSR rates for the USL class, NBHDL segregated the USL class for all of 2009 and reduced the GS<50 kW class accordingly.

With regards to Column B, NBHDL does not submit kW in the RRR filing; in order to provide the data entered in Column B, NBHDL obtained the kW figures for 2009 by running a report within its billing system with the identical parameters used to provide kWh data for the RRR filing. Due to data limitations, the Sentinel Light class kW was obtained from the load forecast.

b) Please explain why no loss factor has been applied to the data entered in Column A.

**Response:**

No loss factor has been applied to the data entered in Column A as the kWh provided in the RRR filings (and subsequently Column A) are already uplifted.

c) Please explain the discrepancy between the loss factor cited on the above sheet and that which is presented in North Bay's current tariff sheet.

**Response:**

Based on the instructions for utilizing 2009 information, NBHDL input the loss factor that was in effect during 2009 for secondary metered services; however, the discrepancy between this loss factor and that which is presented in NBHDL's current tariff sheet does not impact subsequent tabs within the model as the figures provided are already uplifted.

## Revenue Cost Ratio Adjustments

### Board Staff Interrogatory No. 2

Ref: 2011 IRM3 Revenue Cost Ratio Adjustment Workform

Sheet "C1.1 Decision – Cost Revenue Adjustments by Rate Class" of the 2011 IRM3

Revenue Cost Ratio Adjustment Workform is reproduced below.

| Rate Class                        | Direction | Current Year<br>2010 | Transition Year<br>1<br>2011 | Transition Year<br>2<br>2012 | Transition Year<br>3<br>2013 | Transition Year<br>4<br>2014 | Transition Year<br>5<br>2015 |
|-----------------------------------|-----------|----------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|
| Residential                       | No Change | 98.59%               | 98.59%                       | 98.59%                       | 98.59%                       | 98.59%                       | 98.59%                       |
| General Service Less Than 50 kW   | No Change | 112.57%              | 112.57%                      | 112.57%                      | 112.57%                      | 112.57%                      | 112.57%                      |
| General Service 50 to 2,999 kW    | Rebalance | 120.11%              | tbd                          | tbd                          | tbd                          | tbd                          | tbd                          |
| General Service 3,000 to 4,999 kW | Change    | 58.63%               | 69.32%                       | 80.00%                       | 80.00%                       | 80.00%                       | 80.00%                       |
| Unmetered Scattered Load          | No Change | 99.65%               | 99.65%                       | 99.65%                       | 99.65%                       | 99.65%                       | 99.65%                       |
| Sentinel Lighting                 | Change    | 54.24%               | 62.12%                       | 70.00%                       | 70.00%                       | 70.00%                       | 70.00%                       |
| Street Lighting                   | Change    | 40.05%               | 55.03%                       | 70.00%                       | 70.00%                       | 70.00%                       | 70.00%                       |

a) Board staff has been unable to verify that the current year revenue cost ratios are correct.

Please provide supporting evidence from North Bay's latest rates application.

#### Response:

Please see Appendix I (page 46 of 53) of NBHDL's draft rate order (EB-2009-0270) to verify that the current year revenue cost ratios are correct.

### Board Staff Interrogatory No. 3

Ref: 2011 IRM3 Revenue Cost Ratio Adjustment Workform

Sheet "C1.3 – Transformer Allowance" of the 2011 IRM3 Revenue Cost Ratio

Adjustment Workform is reproduced below.

| Rate Class                        | Transformer Allowance In Rate | Transformer Allowance<br>A | Transformer Allowance kW's<br>C | Transformer Allowance Rate<br>E | Volumetric Distribution Rate<br>F | Billed kW's<br>G | Adjusted Volumetric Distribution Rate<br>$I = (F * (G - C) + (F - E) * C) / G$ |
|-----------------------------------|-------------------------------|----------------------------|---------------------------------|---------------------------------|-----------------------------------|------------------|--|
| Residential                       | No                            |                            |                                 |                                 |                                   |                  |  |
| General Service Less Than 50 kW   | No                            |                            |                                 |                                 |                                   |                  |  |
| General Service 50 to 2,999 kW    | Yes                           | 58,777                     | 97,962                          | 0.6000                          | 2.2209                            | 638,330          | 2.1288   |
| General Service 3,000 to 4,999 kW | Yes                           | 44,463                     | 74,106                          | 0.6000                          | 0.8434                            | 74,106           | 0.2434   |
| Unmetered Scattered Load          | No                            |                            |                                 |                                 |                                   |                  |  |
| Sentinel Lighting                 | No                            |                            |                                 |                                 |                                   |                  |  |
| Street Lighting                   | No                            |                            |                                 |                                 |                                   |                  |  |
|                                   |                               | 103,240                    | 172,067                         |                                 |                                   | 712,435          |  |
|                                   |                               | B                          | D                               |                                 |                                   | H                |  |

a) Board staff has been unable to verify that the data entered on this sheet is correct. Please provide supporting evidence.

#### Response:

Please see Appendix J (page 49 of 53) of the Draft Rate Order (EB-2009-0270) to verify the Transformer Allowance calculated in Column "A". The transformer allowance rate of \$0.60 can be verified on page 9 of the approved Tariff of Rates and Charges, thus verifying the kW data provided in Column "C".

In addition, pages 5 and 6 of Exhibit 8 in NBHDL's application (EB-2009-0270) show an adjustment of \$0.092 per kW for the GS 50 to 2999 kW class and \$0.60 for the GS 3000 to 4999 kW class which is consistent with the adjustment between column F and the "Adjusted Volumetric Distribution Rate" above.

## Shared Tax Savings

### Board Staff Interrogatory No. 4

Ref: 2011 IRM3 Shared Tax Savings Workform

Sheet “F1.1 – Z-Factor Tax Changes” of the 2011 IRM3 Shared Tax Savings Workform is reproduced below.

#### Summary - Sharing of Tax Change Forecast Amounts

##### 1. Tax Related Amounts Forecast from Capital Tax Rate Changes

|   | 2010         | 2011         | 2012         |
|---|--------------|--------------|--------------|
| Taxable Capital                                   | \$44,105,306 | \$44,105,306 | \$44,105,306 |
| Deduction from taxable capital up to \$15,000,000 | \$15,000,000 | \$15,000,000 | \$15,000,000 |
| Net Taxable Capital                               | \$29,105,306 | \$29,105,306 | \$29,105,306 |
| Rate  | 0.150%       | 0.000%       | 0.000%       |
| Ontario Capital Tax (Deductible, not grossed-up)  | \$ 21,650    | \$ -         | \$ -         |

##### 2. Tax Related Amounts Forecast from Income Tax Rate Changes

|  | 2010         | 2011         | 2012         |
|--|--------------|--------------|--------------|
| Regulatory Taxable Income                                  | \$ 1,500,001 | \$ 1,500,001 | \$ 1,500,001 |
| Corporate Tax Rate   | 30.99%       | 28.25%       | 26.25%       |
| Tax Impact   | \$ 464,880   | \$ 423,720   | \$ 393,735   |
| Grossed-up Tax Amount                                      | \$ 673,661   | \$ 590,534   | \$ 533,871   |
| Tax Related Amounts Forecast from Capital Tax Rate Changes | \$ 21,650    | \$ -         | \$ -         |
| Tax Related Amounts Forecast from Income Tax Rate Changes  | \$ 673,661   | \$ 590,534   | \$ 533,871   |
| Total Tax Related Amounts                                  | \$ 695,311   | \$ 590,534   | \$ 533,871   |
| Incremental Tax Savings                                    |              | -\$ 104,777  | -\$ 161,440  |
| Sharing of Tax Savings (50%)                               |              | \$ 52,388    | \$ 80,720    |

a) Board staff has been unable to verify that the data entered on this sheet is correct. Please provide supporting evidence.

#### Response:

The data used for “Taxable Capital” above was determined to be NBHDL’s approved rate base, which can be verified on page 5 of NBHDL’s Draft Rate Order and on page 29 of NBHDL’s Settlement Agreement. NBHDL is entitled to the full exemption of \$15m which can also be verified within the Settlement Agreement and the Draft Rate Order on the pages previously mentioned.

In its 2010 COS application, NBHDL was approved for \$686,307 for income and capital taxes as can be confirmed on page 5 of the Draft Rate Order and pages 29 and 54 of the Settlement Agreement; this was based on an effective tax rate of 28.72%. As referred to in NBHDL’s Manager’s Summary for the 2011 IRM Application, it is NBHDL’s assumption that the “2011 IRM3 Shared Tax Savings Work form” model should calculate an identical grossed up tax amount as was approved in the 2010 COS decision. In its Manager’s Summary, NBHDL referenced a limitation of the model – this can be seen in the following example:

- All other data remaining consistent, if NBHDL inputs a regulatory taxable income of \$2,313,637 (Appendix G – page 41 of 53 – Draft Rate Order), the

model determines the “Total Tax Related Amounts” to be \$1,060,721 – an increase over NBHDL’s approved PILs amount by \$374,414.

- All other data remaining consistent, if NBHDL inputs a taxable income of \$1,649,160 (Revenue Requirement Work Form EB-2009-0270 – submitted April 12, 2010 – tab “3.Taxes\_PILs), the model determines the “Total Tax Related Amounts” to be \$762,299 – an increase over NBHDL’s approved PILs amount by \$75,992.
- All other data remaining consistent, if NBHDL inputs a regulatory taxable income of \$1,500,000, the model determines the “Total Tax Related Amounts” to be \$656,638 – a decrease over NBHDL’s approved PILs amount of \$29,669. A change of \$1 (i.e.; adjusting regulatory taxable income to \$1,500,001), results in a total tax amount of \$695,311; a \$9,004 deviation from the approved PILs amount of \$686,307.

Based on these limitations, NBHDL assumed a regulatory taxable income of \$1,500,001 which results in the closest “Total Tax Related Amounts” to NBHDL’s approved PILs amount of \$695,311.

In reviewing the IRM application of Haldimand County Hydro Inc. (HCHI) (EB-2010-0086), it was discovered that HCHI was able to have the model revised to reflect their respective Board approved “Total Tax Related Amounts” which appear to have included an effective tax rate which was applied against taxable income. NBHDL suggests a similar revision to its Tax Savings Sharing Model which would result in an approved tax rate for 2010 for which to base 2011 estimated tax savings.

## APPENDIX "A"

### SUMMARY OF RRR FILINGS FOR 2009



**RRR Filings - 2009 - 2.1.3 ~ Market Monitoring ~ Loss Adjusted Billed kWh**

|  | <u>Distributor</u><br><u>Energy Sales</u> | <u>Shell</u>      | <u>Canada</u><br><u>Energy</u> | <u>Constellation</u> | <u>Direct Energy</u> | <u>ECNG</u>      | <u>OESC</u>       | <u>Planet Energy</u> | <u>Superior</u><br><u>Energy</u> | <u>Sum mitt</u><br><u>Energy</u> | <u>Universal</u>  | <u>Wholesale</u> | <u>Com setec</u> | <u>Blue Power</u> | <u>Total</u>       |
|--|---|-------------------|--------------------------------|----------------------|----------------------|------------------|-------------------|----------------------|----------------------------------|----------------------------------|-------------------|------------------|------------------|-------------------|--------------------|
| <b><u>Q1 - ending March 31, 2009:</u></b>    |   |                   |                                |                      |                      |                  |                   |                      |                                  |                                  |                   |                  |                  |                   |                    |
| Residential                                  | 69,193,396                                | -                 | 12,016                         | -                    | 4,084,557            | -                | 5,362,807         | -                    | 9,555                            | 559,541                          | 3,058,620         | 6,221            | -                | -                 | 82,286,713         |
| GS<50 kW                                     | 25,015,782                                | 451,328           | -                              | 555,074              | 1,139,559            | -                | 825,963           | 9,403                | 10,358                           | 416                              | 467,529           | -                | -                | -                 | 28,475,410         |
| GS>50 kW                                     | 45,570,001                                | 3,436,726         | -                              | 1,022,351            | 2,725,694            | 1,846,391        | 2,121,326         | -                    | -                                | -                                | 860,241           | -                | -                | -                 | 57,582,729         |
| Intermediate                                 | 3,007,091                                 | 2,816,876         | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 5,823,967          |
| USL  | 82,570                                    | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 82,570             |
| Sentinal Lights                              | 135,051                                   | 2,378             | -                              | -                    | 2,928                | -                | 236               | -                    | 505                              | 314                              | 1,769             | -                | -                | -                 | 143,180            |
| Street Lights                                | 751,721                                   | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 751,721            |
| Total - Q 1                                  | 143,755,610                               | 6,707,307         | 12,016                         | 1,577,425            | 7,952,737            | 1,846,391        | 8,310,332         | 9,403                | 20,418                           | 560,271                          | 4,388,158         | 6,221            | -                | -                 | 175,146,288        |
| <b><u>Q2 - ending June 30, 2009:</u></b>     |   |                   |                                |                      |                      |                  |                   |                      |                                  |                                  |                   |                  |                  |                   |                    |
| Residential                                  | 43,985,960                                | -                 | 8,947                          | -                    | 2,453,515            | -                | 3,223,155         | -                    | 4,522                            | 322,794                          | 1,809,939         | 3,951            | -                | -                 | 51,812,783         |
| GS<50 kW                                     | 18,847,649                                | 380,249           | -                              | 515,870              | 862,668              | -                | 587,155           | 31,869               | 10,160                           | 171                              | 344,148           | -                | -                | -                 | 21,579,940         |
| GS>50 kW                                     | 48,713,008                                | 3,264,984         | -                              | 805,263              | 1,530,774            | 1,967,713        | 2,044,125         | -                    | -                                | 54,511                           | 802,049           | -                | -                | -                 | 59,182,427         |
| Intermediate                                 | 5,940,656                                 | 4,397,264         | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 10,337,920         |
| USL  | 82,570                                    | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 82,570             |
| Sentinal Lights                              | 139,916                                   | 5,160             | -                              | -                    | 2,412                | -                | 236               | -                    | 505                              | 157                              | 1,283             | -                | -                | -                 | 149,668            |
| Street Lights                                | 1,085,663                                 | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 1,085,663          |
| Total - Q 1                                  | 118,795,422                               | 8,047,657         | 8,947                          | 1,321,133            | 4,849,368            | 1,967,713        | 5,854,671         | 31,869               | 15,187                           | 377,633                          | 2,957,418         | 3,951            | -                | -                 | 144,230,969        |
| <b><u>Q3 - ending Sept 30, 2009:</u></b>     |   |                   |                                |                      |                      |                  |                   |                      |                                  |                                  |                   |                  |                  |                   |                    |
| Residential                                  | 36,637,950                                | -                 | 8,847                          | -                    | 2,549,097            | -                | 3,116,558         | -                    | 3,942                            | 351,715                          | 2,006,454         | -                | -                | -                 | 44,674,562         |
| GS<50 kW                                     | 18,485,814                                | 270,277           | -                              | 642,736              | 1,258,981            | 24,937           | 691,150           | 85,693               | 36,392                           | 186                              | 384,827           | -                | 73,083           | -                 | 21,954,075         |
| GS>50 kW                                     | 39,048,362                                | 2,669,234         | -                              | 780,999              | 2,875,578            | 1,769,081        | 1,923,506         | -                    | -                                | 92,735                           | 862,268           | -                | 349,502          | -                 | 50,371,264         |
| Intermediate                                 | 4,733,929                                 | 7,220,630         | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 11,954,559         |
| USL  | 81,954                                    | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 81,954             |
| Sentinal Lights                              | 137,081                                   | 5,160             | -                              | -                    | 2,733                | -                | 236               | -                    | 505                              | 236                              | 1,526             | -                | -                | -                 | 147,476            |
| Street Lights                                | 662,874                                   | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 662,874            |
| Total - Q 1                                  | 99,787,964                                | 10,165,301        | 8,847                          | 1,423,734            | 6,686,389            | 1,794,018        | 5,731,450         | 85,693               | 40,838                           | 444,871                          | 3,255,074         | -                | 422,585          | -                 | 129,846,764        |
| <b><u>Q4 - ending December 31, 2009:</u></b> |   |                   |                                |                      |                      |                  |                   |                      |                                  |                                  |                   |                  |                  |                   |                    |
| Residential                                  | 40,284,008                                | -                 | 10,237                         | -                    | 2,344,847            | -                | 2,962,383         | -                    | 3,042                            | 327,892                          | 1,948,268         | -                | -                | 14,979            | 47,895,656         |
| GS<50 kW                                     | 16,992,593                                | 353,572           | -                              | 570,305              | 1,077,269            | 19,950           | 655,707           | 87,121               | 46,086                           | 1,438                            | 342,821           | -                | 71,026           | -                 | 20,217,889         |
| GS>50 kW                                     | 38,185,493                                | 5,371,727         | -                              | 771,983              | 2,201,244            | 2,202,937        | 1,818,693         | 258,449              | -                                | 87,417                           | 709,268           | -                | 371,688          | -                 | 51,978,899         |
| Intermediate                                 | 4,764,272                                 | 5,797,057         | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 10,561,329         |
| USL  | 81,954                                    | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 81,954             |
| Sentinal Lights                              | 134,387                                   | 6,531             | -                              | -                    | 3,092                | -                | 236               | -                    | 505                              | 236                              | 1,526             | -                | -                | -                 | 146,512            |
| Street Lights                                | 950,471                                   | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 950,471            |
| Total - Q 1                                  | 101,393,179                               | 11,528,888        | 10,237                         | 1,342,288            | 5,626,452            | 2,222,887        | 5,437,019         | 345,570              | 49,633                           | 416,982                          | 3,001,882         | -                | 442,715          | 14,979            | 131,832,711        |
| <b><u>YTD Totals</u></b>                     |   |                   |                                |                      |                      |                  |                   |                      |                                  |                                  |                   |                  |                  |                   |                    |
| Residential                                  | 190,101,314                               | -                 | 40,047                         | -                    | 11,432,015           | -                | 14,664,903        | -                    | 21,062                           | 1,561,942                        | 8,823,280         | 10,172           | -                | 14,979            | 226,669,714        |
| GS<50 kW                                     | 79,341,838                                | 1,455,426         | -                              | 2,283,985            | 4,338,477            | 44,887           | 2,759,975         | 214,086              | 102,995                          | 2,210                            | 1,539,325         | -                | 144,109          | -                 | 92,227,314         |
| GS>50 kW                                     | 171,516,864                               | 14,742,670        | -                              | 3,380,594            | 9,333,290            | 7,786,122        | 7,907,651         | 258,449              | -                                | 234,663                          | 3,233,825         | -                | 721,190          | -                 | 219,115,319        |
| Intermediate                                 | 18,445,948                                | 20,231,828        | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 38,677,776         |
| USL  | 329,048                                   | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 329,048            |
| Sentinal Lights                              | 546,435                                   | 19,230            | -                              | -                    | 11,165               | -                | 942               | -                    | 2,019                            | 942                              | 6,102             | -                | -                | -                 | 586,835            |
| Street Lights                                | 3,450,728                                 | -                 | -                              | -                    | -                    | -                | -                 | -                    | -                                | -                                | -                 | -                | -                | -                 | 3,450,728          |
| <b>Total - 2009</b>                          | <b>463,732,174</b>                        | <b>36,449,153</b> | <b>40,047</b>                  | <b>5,664,580</b>     | <b>25,114,947</b>    | <b>7,831,009</b> | <b>25,333,471</b> | <b>472,536</b>       | <b>126,076</b>                   | <b>1,799,757</b>                 | <b>13,602,532</b> | <b>10,172</b>    | <b>865,299</b>   | <b>14,979</b>     | <b>581,056,732</b> |