CANADIAN NIAGARA POWER INC.

A FORTIS ONTARIO Company

An Application

By

Canadian Niagara Power Inc.

To Adjust

Electricity Distribution Rates

Effective January 1, 2023

EB-2022-0019

Filed: August 3, 2022

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ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, C. S.O. 1998, c.15 (Sched. B);

AND IN THE MATTER OF an Application by Canadian Niagara Power Inc. for an Order or Orders pursuant to Section 78 of the *Ontario Energy Board Act, 1998* approving or fixing just and reasonable rates and other service charges for the distribution of electricity.

APPLICATION

1. The applicant is Canadian Niagara Power Inc. ("CNPI" or the "Applicant"), a licensed distributor (ED-2002-0572) that owns and operates electricity distribution systems in Fort Erie, Port Colborne and Gananoque. CNPI is an Ontario corporation with its head office in Fort Erie, and is a wholly-owned subsidiary of FortisOntario Inc.

2. CNPI hereby applies to the Ontario Energy Board (the "Board" or the "OEB"), pursuant to section 78 of the *Ontario Energy Board Act, 1998* as amended (the "OEB Act") for an Order or Orders approving its proposed electricity distribution rates and other charges, effective January 1, 2023.

3. Effective January 1, 2022 in the matter of EB-2021-0011, the Board approved electricity distribution rates for CNPI's electricity distribution customers.

4. CNPI is seeking approval for electricity distribution rates using the OEB's 2023 IRM Rate Generator Model. CNPI confirms that pre-populated values and billing determinants in the models as filed are accurate.

5. In this Application, CNPI is applying to the Board to change the amount it charges for the delivery of electricity as follows:
   - A Residential RPP customer consuming 750 kWh per month would experience a total bill increase of $7.15 or 5.5%.
   - A small general service RPP customer consuming 2000 kWh would experience a total bill increase of $15.79 or 4.9%.

6. The persons affected by this Application are the ratepayers of CNPI's Fort Erie, Port Colborne and Gananoque service territories. It is impractical to set out their names and addresses because they are too numerous.

7. The Applicant confirms that the Application and related documents will be published on its website (www.cnpower.com)

8. The Applicant requests that, pursuant to Section 32.01 of the OEB's *Rules of Practice and Procedure*, this proceeding be conducted by way of written hearing.

9. The Applicant requests that a copy of all documents filed with the OEB in this proceeding be served on the Applicant, by email, as follows:

   Glen King
   Vice President Finance & Chief Financial Officer
   Canadian Niagara Power Inc.
   Phone: (905) 871-0330 x3643

   Email Address: regulatoryaffairs@fortisontario.com

10. In addition to the written evidence provided herein, the following live Microsoft Excel models have been filed in conjunction with the Application:

    - 2023_IRM-Rate-Generator-Model_20220616_CNPI.xlsb
    - 2023_GA_Analysis_Workform_20220527_CNPI.xlsb
    - 2023_IRM_Checklist_CNPI_20220726.xlsx

MANAGER'S SUMMARY

PREAMBLE

This Application was prepared in accordance with Chapter 3, Incentive Rate Setting Applications, of the Board's Filing Requirements for Electricity Distribution Rate Applications – 2022 Edition for 2023 Rate Applications, dated May 24, 2022 (the "Filing Requirements"). All rates referenced in this Manager's Summary and included in the accompanying 2023 Proposed Tariff of Rates and Charges are based on the output of the OEB's 2023 IRM Rate Generator Model (the "2023 IRM Model" or the "IRM Model").

This Application contains a Z-factor claim related to a severe windstorm in the Niagara Region on December 11, 2021. Details of CNPI's response to this storm in relation to the OEB's Z-factor filing guidelines are provided in the relevant sections of this Manager's Summary.

The following table summarizes CNPI's 2023 proposed distribution rates, as compared to its current approved rates.

Table 1 – Distribution Rate Summary

Rate Class	Current MFC	Current Volumetric Charge	Price Cap Index	Proposed MFC	Proposed Volumetric Charge
Residential	$40.16	-	2.85%	$41.30	-
General Service Less Than 50 kW	$33.84	$0.0275	2.85%	$34.80	$0.0283
General Service 50 TO 4,999 KW	$169.70	$8.0125	2.85%	$174.54	$8.2409
Embedded Distributor	$610.63	$9.2267	2.85%	$628.03	$9.4897
Unmetered Scattered Load	$53.36	$0.0290	2.85%	$54.889	$0.0298
Standby Power	-	$1.3163	2.85%	-	$1.3538
Sentinel Lighting	$6.11	$7.0600	2.85%	$6.28	$7.2612
Street Lighting	$4.09	$8.1548	2.85%	$4.21	$8.3872
microFIT	$4.55	-	N/A	$4.55	-

ELEMENTS OF THE APPLICATION

This 2023 4th Generation Incentive Rate-setting Application includes discussion of the items listed below, with the relevant section of the Filing Requirements included in parentheses where applicable:

- The price cap adjustment for 2023 distribution rates (3.2.1)
- Retail Transmission Service Rates (3.2.4)
- Review and disposition of Group 1 DVA balances (3.2.5)
- LRAMVA (3.2.6)
- Tax changes (3.2.7)
- Z-factor claims (3.2.8)
- Bill Impacts

For greater clarity, this Application does not include any claims, changes, requests or proposals in relation to any of the following items:

- Revenue-to-cost ratio adjustments (3.2.2)
- Advanced Capital Module (3.3.1)
- Incremental Capital Module (3.3.2)
- 'Eligible Investments' (3.3.3)

PRICE CAP ADJUSTMENT

CNPI is submitting this Application with a placeholder price cap adjustment of 2.85%. This is based on the 2022 rate-setting parameters; an inflation factor of 3.30%, a productivity factor of 0.0%, and a stretch factor of 0.45%. CNPI acknowledges that Board Staff will update the 2023 IRM Model to reflect the 2023 price cap parameters, once available.

RETAIL TRANSMISSION SERVICE RATES ("RTSR")

CNPI is proposing 2023 Retail Transmission Service Rates ("RTSR") that are compliant with the Board's Guideline G-2008-0001, Revision 4.0, dated June 28, 2012. CNPI's proposed 2023 RTSR rates are calculated in Tabs 10-15 of the 2023 IRM Model. An electronic version of the Model has been filed with this Application, and a print version of the Model has been provided in Schedule "B" to this Application.

CNPI's proposed RTSR effective January 1, 2023 are shown in Table 2 below. The proposed RTSR are based on the output of the IRM Model, which at the time of this Application uses the approved interim 2022 UTR and approved Hydro One sub-transmission rates as placeholders for 2023 rates. CNPI acknowledges that once any 2023 UTR or Hydro One sub-transmission rates are approved, OEB Staff will update the model accordingly.

Table 2 – RTSR Summary

Service Classification	2022 Approved	2023 Proposed	Unit
Residential			
Retail Transmission Rate - Network Service Rate	0.0093	0.0097	$/kWh
Retail Transmission Rate - Line and Connection Service Rate	0.0072	0.0072	$/kWh
GS<50			
Retail Transmission Rate - Network Service Rate	0.0080	0.0084	$/kWh
Retail Transmission Rate - Line and Connection Service Rate	0.0062	0.0062	$/kWh
GS>50			
Retail Transmission Rate - Network Service Rate	3.3848	3.5462	$/kW
Retail Transmission Rate - Line and Connection Service Rate	2.5670	2.5549	$/kW
Embedded Distributor			
Retail Transmission Rate - Network Service Rate	3.3848	3.5462	$/kW
Retail Transmission Rate - Line and Connection Service Rate	2.5670	2.5549	$/kW
Unmetered Scattered Load			
Retail Transmission Rate - Network Service Rate	0.0083	0.0087	$/kWh
Retail Transmission Rate - Line and Connection Service Rate	0.0063	0.0063	$/kWh
Sentinel Lights			
Retail Transmission Rate - Network Service Rate	2.8845	3.0220	$/kW
Retail Transmission Rate - Line and Connection Service Rate	2.0949	2.0851	$/kW
Street Lighting			
Retail Transmission Rate - Network Service Rate	2.5054	2.6249	$/kW
Retail Transmission Rate - Line and Connection Service Rate	1.9586	1.9494	$/kW

REVIEW AND DISPOSITION OF GROUP 1 DEFERRAL AND VARIANCE ACCOUNTS

In accordance with the Filing Requirements, CNPI verified pre-populated values and otherwise populated the relevant Group 1 Deferral and Variance Accounts ("DVA") tabs within the 2023 IRM Rate Generator Model. A print version of the DVA Workform is provided in Schedule "B" to this Application.

In the table below, the threshold test using the Group 1 Sub-Total (including Account 1589 - Global Adjustment) yields a value of $0.0014 per kWh which does exceed the threshold set out in Chapter 3.

Table 3 – Threshold Test

Threshold Test	
Total Claim (including Account 1568)	$676,117
Total Claim for Threshold Test (All Group 1 Accounts)	$676,117
Threshold Test (Total claim per kWh) [2]	$0.0014

The threshold has been exceeded so CNPI is requesting disposition of its Group 1 accounts within this Application.

The following table details the reconciliation of the DVA Workform with CNPI RRR filings as at December 31, 2021:

Table 4 – Reconciliation of DVA Workform to RRR Filings

Explanation of Variances Between 2.1.7 RRR Filing and DVA WorkForm
Canadian Niagara Power Inc.
EB-2022-0019
Balances as at December 31, 2021

Group 1 Accounts	Account Number	Per DVA Work Form	Per 2.1.7 Filing	Variance	
LV Variance Account	1550	56,056	56,056	-	
Smart Metering Entity Charge Variance Account	1551	(22,155)	(22,154)	1	
RSVA - Wholesale Market Service Charge	1580	(52,457)	15,894	68,351	A
Variance WMS – Sub-account CBR Class A	1580	-	-	-	
Variance WMS – Sub-account CBR Class B	1580	68,351	68,350	(1)	
RSVA - Retail Transmission Network Charge	1584	847,248	847,248	-	
RSVA - Retail Transmission Connection Charge	1586	62,920	62,921	1	
RSVA - Power (excluding Global Adjustment)	1588	(551,839)	(621,100)	(69,261)	B
RSVA - Global Adjustment	1589	(57,120)	(363,386)	(306,266)	C
Disposition and Recovery/Refund of Regulatory Balances (2017)	1595	9,617	9,618	1	
Disposition and Recovery/Refund of Regulatory Balances (2018)	1595	(78,224)	(78,225)	(1)	
Disposition and Recovery/Refund of Regulatory Balances (2019)	1595	(13,523)	(13,523)	-	
Disposition and Recovery/Refund of Regulatory Balances (2020)	1595	61,359	61,359	-	
Disposition and Recovery/Refund of Regulatory Balances (2021)	1595	122,405	122,405	-	
		452,638	**145,463**	**(307,175)**	

Notes:

A Balance in 2.1.7 filing includes CBR Class B balance which is reported separately in DVA Work Form.

B Variance relates to:

	Differences Explained
IESO CT 142 and 148 (and H1 Bill 10 Adj and GA charges) true-up of commodity and GA charges based on actual RPP volumes	(53,732)
2021 MicroFit + FIT true-up	80,472
Difference between December 2021 unbilled commodity revenue accrual and billed actual	(96,000)
Difference between December 2021 IESO CT 101 (and H1 Electricity) accrual and billed actual	-
Total differences explained	(69,260)
Per above	(69,261)
Unexplained difference	1

C Variance relates to:

	Differences Explained
IESO CT 148 (and H1 GA charges) true-up of GA charges based on actual RPP/non-RPP volumes	(51,563)
Difference between December 2021 unbilled GA revenue accrual and billed actual	7,000
Correction to Gananoque RPP 2021 settlements	(261,703)
Total differences explained	(306,266)
Per above	(306,266)
Unexplained difference	-

Adjustments to DVA Balances

CNPI has not made any material adjustments to DVA balances that were previously approved by the Board on a final basis in both Cost of Service ("CoS") and IRM proceedings (i.e. balances that were adjusted subsequent to the balance sheet date that were cleared in the most recent rates proceeding).

1595 Residual Balances

CNPI is requesting disposition of its 1595 (2019) residual account balance as two years have passed since the expiry date of the rate riders which was December 31, 2019. CNPI confirms that the residual balance of ($13,523) is not material. CNPI confirms that residual balances in Account 1595 Sub-accounts for each vintage year have only been disposed once.

Global Adjustment

CNPI had both Class A and Class B customers throughout the period requested for disposition within this Application, including transitional customers. Therefore, the relevant tabs have been completed within the 2023 IRM Rate Generator Model to ensure appropriate allocation of Group 1 DVA balances and calculation of rate riders.

In accordance with the Filing Requirements, CNPI has completed the GA Analysis Workform. An electronic copy of the Workform has been filed in conjunction with this Application, and a print version of the Workform has been provided in Schedule "C" to this Application. Unexplained discrepancies are within the +/- 1% threshold of total annual IESO GA charges. CNPI noted in its Workform that the GA rate used for unbilled revenue is not the same as the one used for billed revenue (2nd Estimate). Due to the timing in which the unbilled reports are run in the system, the 1st GA estimate is used for all non-interval customers and for interval customers, the 2nd GA estimate is used. This is a consistent approach taken as compared to prior years.

There was one correction noted for 2021 whereby the basis of the Global Adjustment component of the settlement calculation (and reclass to 1588 entries) for the Gananoque service territory (embedded within Hydro One) was overstated because the non-RPP GA

Deferral Recovery amount was included in the underlying calculations. Correction is DR to 1589 and $Nil impact to 1588 because the difference is due back to the IESO via RPP settlements. Correction has been reflected both in 1589 GA Workform as well as DVA continuity schedule.

Commodity Accounts 1588 and 1589

CNPI confirms that it has followed the accounting guidance related to Accounts 1588 Power, and 1589 RSVA Global Adjustment as laid out in the OEB letter issued on February 21, 2019. The transactions recorded in these accounts during 2021 were accounted for accordance with this guidance.

Certification of Evidence

A certification has been provided in Schedule “A” to this Application.

Capacity Based Recovery (CBR)

CNPI has followed the accounting guidance on disposition of CBR variances. The relevant tabs have been completed within the 2023 IRM Model to ensure appropriate allocation of the CBR balance being request for disposition within this Application.

Disposition of DVA Balances

CNPI has used the same allocation methodology as used in previous proceedings to assign Group 1 balances to its rate classes.

In consideration of the recommendation outlined in the Filing Requirements along with assessing bill impacts, CNPI has proposed a one-year disposition period. Rate rider calculations can be found in the electronic copy of the 2023 IRM Rate Generator Model that has been submitted with this Application. A print version of the Model has been provided in Schedule “B” to this Application.

LRAMVA

The lost revenue adjustment mechanism variance account (LRAMVA) is a retrospective adjustment designed to account for differences between forecast revenue loss attributable to CDM activity embedded in rates and actual revenue loss due to the impacts of CDM programs. The OEB established Account 1568 as the LRAMVA to capture the difference between the OEB-approved CDM forecast and actual results at the customer rate class level. CNPI disposed of its 2020 LRAMVA balances in its 2022 cost of service application. CNPI will not be disposing any further CFF-related LRAMVA balances.

TAX CHANGES

In relation to Bill C-97, which provides for a first-year increase in Capital Cost Allowance ("CCA") deductions on eligible capital assets acquired after November 20, 2018, CNPI has recorded the impacts of CCA rule changes in Account 1592, in accordance with the OEB's July 25, 2019 letter.[1] CNPI addressed disposition of these amounts in its 2022 cost of service application. From 2022 to CNPI's next rebasing application, account 1592 will only capture the impact of any further changes to the CCA rules beyond those contemplated in CNPI's 2022 cost of service application.

No other legislated tax changes result in changes from the tax rates embedded in CNPI's approved distribution rates, therefore Tabs 8 and 9 of the IRM Model have not been populated.

Z-FACTOR CLAIM

Z-Factor Costs

CNPI recorded total costs of $510,300 related to the December 11, 2021 storm and subsequent restoration efforts. Due to the nature of the damage caused by the storm, and the requirement to replace a significant number of poles during restoration efforts, CNPI

[1] Accounting Direction Regarding Bill C-97 and Other Changes in Regulatory or Legislated Tax Rules for Capital Cost Allowance, issued July 25, 2019

differentiated these costs between capital and O&M costs as summarized in Table 5 below. A small portion of the O&M costs ($55,600) relates to CNPI internal labour incurred during regular business hours. Since recovery of regular-time labour costs is already embedded in rates and CNPI would have incurred these regular-time labour costs whether or not the storm had occurred, these costs were not recorded in Account 1572. The balance of O&M costs of $135,900 related to the December 2021 storm, for which CNPI is requesting Z-factor cost recovery, were recorded in Account 1572. CNPI's total Z-factor claim of $157,900 is comprised of the principal amount recorded in Account 1572, revenue requirement associated with capital expenditures, plus forecasted interest costs for 2022, as shown in Table 5. Further detail on the total storm costs and interest calculations are provided in Schedule "G".

Table 5 – Summary of Storm Costs

Category	Amount
Capital	$318,800
O&M (Regular-Time Labour)	$55,600
O&M (Recorded in Acct 1572)	$135,900
Total Storm Costs	**$510,300**

Table 6 – Summary of Z-Factor Claim

Category	Amount
Acct 1572 Principal Balance	$135,900
Acct 1572 2020 Interest Forecast	$1,000
Capital Expenditures	$21,000
Total Z-Factor Claim	**$157,900**

Table 7 – Revenue Requirement Impact of Capital Expenditures

Description	Rate (%)	Amount
Incremental Capital		$318,800
Depreciation Expense	45 years	-$7,100
Incremental Capital to be included in Rate Base		**$311,700**
Deemed Short Term Debt (4%)	1.76%	$200
Deemed Long Term Debt (56%)	5.81%	$10,100
Deemed Equity (40%)	8.78%	$10,900

Amortization Expense		$7,100
Grossed Up PILS		-$7,300
Revenue Requirement		**$21,000**
PILs Calculation		
Deemed Equity		$10,900
Add Back Amortization Expense		$7,100
Deduct Enhanced CCA Expense	12.00%	-$38,300
Taxable Income		**-$20,300**
PILs Before Gross Up	26.50%	-$5,400
Incremental Grossed Up Pills		-$7,300

Z-Factor Eligibility Criteria

The eligibility criteria set out in the 3rd Generation IR Report are as follows:

Table 8 – Z-Factor Eligibility Criteria[2]

Criteria	Description
Causation	Amounts should be directly related to the Z-factor event. The amount must be clearly outside of the base upon which rates were derived.
Materiality	The amounts must exceed the Board-defined materiality threshold and have a significant influence on the operation of the distributor; otherwise they should be expensed in the normal course and addressed through organizational productivity improvements.
Prudence	The amount must have been prudently incurred. This means that the distributor's decision to incur the amount must represent the most cost-effective option (not necessarily least initial cost) for ratepayers.

Causation

The costs summarized above were directly related to repairs to CNPI's distribution system and restoration of service as a result of the December 11, 2021 wind storm. The costs are supported by invoicing from the various LDC's and contractors that assisted with restoration efforts, as well as timesheet and material charges to work orders created to track the costs of this specific storm event.

[2] Reproduced from Table 8 of the 3rd Generation IR Report.

CNPI undertakes regular vegetation management in order to mitigate tree-caused outages and damage from weather-related events. However, the combination of rain, and extreme and long-lasting wind gusts[3] caused tree failures, pole failures and downed wires to an extent that would not have occurred under normal weather conditions. CNPI could not have reasonably designed or managed its distribution system to avoid all of the damage and outages resulting from this storm.

CNPI has not experienced such an extensive amount of weather-related damage to its distribution, since a severe early-season snowstorm in October/November of 2019, the costs of which were also subject to a Z-factor claim. Due to the infrequent and extreme nature of such events, CNPI has not planned or budgeted for such events, and as such, the costs of this extreme and unusual event are incremental to the costs underpinning CNPI's rate at the time of the storm (CNPIS's 2017 cost of service application).

Materiality

For distributors with revenue requirements between $10 million and $200 million, the 3rd Generation IR Report defines a materiality threshold of 0.5% of revenue requirement for Z-factor claims. Accordingly, using CNPI's approved revenue requirement from the applicable cost of service application (2017)[4], the materiality threshold is calculated as:

$21,388,669 * 0.5% = $106,943

CNPI's Z-factor claim of $157,900 exceeds the materiality threshold.

[3] Weather reports included in Schedule "I" show over 6 mm of precipitation and winds of 130 km/h on December 11.
[4] EB-2016-0061, Revenue Requirement Workform (DRO), March 16, 2017.

Prudence

CNPI acted in the interests of its customers to restore service as quickly and safely as possible. CNPI deployed all available internal resources to the restoration effort, and issued the vast majority of required materials directly from stores to minimize premiums for emergency purchases and expedited delivery.

With respect to external services, CNPI secured the services of other LDC's through pre-existing mutual aid agreements. Other contractors that assisted with the restoration effort had existing contractual relationships with CNPI, and as such provided services at pre-determined hourly rates. Further, CNPI management and control room staff directly coordinated the activities of all contractors and other LDC's in order to ensure an efficient and productive approach to restoration of power.

Z-Factor Cost Recovery

CNPI proposes to recover its total Z-factor claim of $157,900 through fixed rate riders over a 12-month period from January 1, 2023 to December 31, 2023. In determining its approach to allocating these costs between CNPI's rate classes, and in calculating the resulting rate riders, CNPI reviewed the OEB's recent decision and rate order relating to Burlington Hydro Inc.'s Z-factor claim for 2019 rates.[5] In that decision, the OEB accepted the proposal to: (a) allocate Z-factor costs across all rate classes, in proportion to last OEB-approved revenue by rate class, and (b) recover the allocated amounts through fixed rate riders, based on the most recently reported actual customer counts. The results of CNPI applying this approach to recovery of its Z-factor claim are summarized in Table 9 below, with detailed calculations provided in Schedule "H".

CNPI confirms that during its most recently completed fiscal year (2021), achieved ROE of 3.47% does not exceed 300 basis points above its deemed ROE embedded in its base rates of 8.78%.

[5] EB-2018-0021, Decision and Order, March 28, 2019, pp. 13-14.

Table 9 – Z-Factor Allocation and Rate Rider Summary

Rate Class	Unit	Allocated Revenue (2017 COS)	% Allocation	Total Z-Factor Claim	Customer Count (from 2021 RRR 2.1.2)	Z-Factor Rate Rider (per customer / connection per month)	Z-Factor Revenue Reconciliation
Residential	kWh	$13,474,424	63%	$99,474	27,335	$0.30	$98,406
General Service Less Than 50 kW	kWh	$2,652,019	12%	$19,578	2,505	$0.65	$19,539
General Service 50 to 4,999 KW	kW	$4,684,181	22%	$34,581	201	$14.34	$34,588
Embedded Distributor	kW	$132,000	1%	$974	1	$81.21	$975
Unmetered Scattered Load	kWh	$67,846	0%	$501	43	$0.97	$501
Standby Power	kW	$0	0%	$0	1	$0.00	$0
Sentinel Lighting	kW	$61,500	0%	$454	499	$0.08	$479
Street Lighting	kW	$316,701	1%	$2,338	6,010	$0.03	$2,164
TOTAL		**$21,388,671**	**100%**	**$157,900**			**$156,651**

BILL IMPACT SUMMARY

A summary of total bill impacts resulting from this Application is provided in Table 10 below. Further detail on these bill impacts can be found at Tab 20 in the electronic copy of the 2023 IRM Model that has been submitted with this Application. A print version of the IRM Model has been provided in Schedule "B" to this Application.

Table 10 – Summary of Bill Impacts

RATE CLASSES / CATEGORIES *(eg: Residential TOU, Residential Retailer)*	Consumption (kWh)	Demand (kW)	Units	Total Bill			
				2022	2023	Change 2022 to 2023	
						$	%
Residential - TOU - OEB Typical	750	-	kWh	$ 128.86	$ 136.01	$ 7.15	5.5%
General Service Less Than 50 kW - TOU	2,000	-	kWh	$ 323.04	$ 338.83	$ 15.79	4.9%
General Service 50 to 4,999 kW - Non-RPP	20,000	60	kW	$ 3,418.31	$ 3,609.31	$ 191.00	5.6%
Embedded Distributor	468,676	1,127		$ 74,141.87	$ 77,376.38	$ 3,234.51	4.4%
Unmetered Scattered Load - TOU	3,500	-	kWh	$ 572.97	$ 592.90	$ 19.93	3.5%
Sentinel Lighting - TOU	1,400	5	kW	$ 308.67	$ 328.12	$ 19.45	6.3%
Street Lighting - Non-RPP	5,400	15	kW	$ 1,557.44	$ 1,608.49	$ 51.05	3.3%