

WASAGA DISTRIBUTION INC. (WDI)
2024 RATE APPLICATION (EB-2023-0055)
PRE-SETTLEMENT FOLLOW-UP AND CLARIFICATION RESPONSES

1-Staff-1

Ref: (1) Decision and Order EB-2023-0268 Regulatory Charges, December 7, 2023
(2) Ontario Energy Board announces changes to electricity prices for households, small business and farms, October 19, 2023
(3) Decision and Rate Order EB-2023-0222 2024 Uniform Transmission Rates, January 18, 2024

Question(s):

- a) Please update the Tariff and Bill Impact model with the latest RRRP of \$0.0014/kWh as per Reference 1.
- b) Please update the Tariff and Bill Impact model with the latest time-of-use RPP prices as well as the latest OER of 19.3% as per Reference 2.
- c) Please update UTRs as per Reference 3.
- d) Please update the LEAP expense based on the updated revenue requirement.

Response:

WDI has sent the file to OEB's Rate Models department to fix the above items. The excel document is locked and we are unable to adjust the rates ourselves.

2-Staff-2

Ref: (1) OEB Staff Interrogatories – 2-staff-14d & e
(2) Chapter 2 Appendices – App.2-AA

Preamble:

Wasaga Distribution provided a table describing the pole costs and the number of poles replaced for each project encompassing the pole line rebuild program from 2023-2028.

Question(s):

- a) Please explain what is included in the costs in 2-staff-14d versus what is included in the total annual cost for the pole line rebuild program as per App.2-AA.
- b) Are the pole replacement numbers and costs in 2-staff-14d and e for 2023 year-end numbers? If not, how many months of actual data are included? If year-end numbers are unavailable, please provide actuals available only for 2023 for the number of poles replaced and cost in both the pole-line rebuild program and the miscellaneous pole replacement program.

Response:

- a) The pole line rebuild program costs, as outlined in Appendix 2-AA, encompassed costs associated with poles, transformers, conductors, services, and conduit. However, only the pole-related costs were included for the 2-staff-14 d), as requested.
- b) The pole replacement values provided for 2-Staff-14 d) and e) were planned values. As stated in SEC-27, final 2023 assets have not been built yet.

2-Staff-3

Ref: (1) VECC Interrogatories - 2-VECC-10

Preamble:

Wasaga Distribution noted that vehicles are owned by WRSI.

Question(s):

- a) Did WRSI purchase new fleet in 2023 and/or 2024? If so, at what cost? If so, why were these new vehicles purchased?

Response:

- a) WRSI purchased the following in 2023:
 - i. Radial Boom Derrick (RBD) to replace the 2004 RBD, at a total cost of \$413,010. The new RBD is bigger, required for the new taller poles and larger transformers, allowing for a much safer operation. This was ordered in 2020.
 - ii. Chevrolet 2500 HD Pickup Truck to replace the 2012 Ford F250, at a total cost of \$72,199.

4-Staff-4

Ref: (1) Chapter 2 Appendices – App.2-JD

Preamble:

Wasaga Distribution updated its Maintenance Supervision and Engineering budget in 2023 from the initial application amount of \$168k to \$90k.

Question(s):

- a) What prompted the decrease to the 2023 budget and why is a similar decrease not expected in 2024?

Response:

- a) In 2023, we had budgeted \$58K for maintenance for ESRI Enterprise software, cell phones to facilitate the digitalization of manual processes, and AutoCad maintenance. Maintenance fees were not required in 2023 for ESRI as implementation did not commence until the end of the year. Cell phones and AutoCad maintenance were coded to different accounts.

In addition, one of the Engineer Technicians took on the role of IT in 2023, therefore, approximately \$20K of their time was coded to a different account.

2024 did not decrease because of the ESRI maintenance, and hours increased in this account because the employees charging here spent time on the rate application in 2023 and those hours in 2024 were moved back.

5-Staff-5

- Ref: (1) Affiliate Relationships Code (ARC), pp.8, 11
(2) Master Service Agreement, p.6
(3) EP Interrogatories – 2-EP-10

Preamble:

According to 2.3.4.1 of the ARC, the fully-allocated cost may include a return on the affiliate's invested capital no higher than the utility's approved weighted average cost of capital. Wasaga Distribution's 2016 OEB-approved weighted average cost of capital was 5.86%. Wasaga Distribution's 2024 requested weighted average cost of capital is 6.22%. Wasaga Distribution noted in Reference 2 it calculated a markup of 7% charged to Wasaga Distribution from WRSI to provide a fair rate of return and to recover its direct operating costs.

Question(s):

- a) During the annual review of schedules outlined in Reference 2, do the parties establish what are considered market rates?
- b) Please clarify how the 7% was determined and how it complies with the ARC. Is the 7% return only on capital projects or OM&A also?
- c) Please expand on the response to 2-EP-10c. How does WRSI ensure that it is obtaining the lowest market cost for its capital construction work?

Response:

- a) No, the parties do not review or define market rates during the annual review process. In 2020, when the parties embraced the fully allocated costs methodology, there was insufficient data on market rates related to OM&A services. To assess rates, the parties utilize benchmarking studies and any publicly accessible industry data, supported by staff analysis. The existing approach is considered fair and reasonable.
- b) WRSI has established a "rate base", similar to WDI, and builds that return in as part of the corporate overhead allocation which is how the 7% is determined. The 7% applies to the return on construction projects, to services performed under the MSA, and to all revenue generating sources ensuring equal treatment under this methodology and in consideration of ARC.
- c) WRSI will acquire contractors in accordance with its purchasing policy, employing a competitive bidding process when necessary. The approach involves utilizing benchmarking studies, leveraging forecasting tools for comparisons, and analyzing historical data. This method is also applied when evaluating the performance of all internally constructed assets for WDI. Achieving the most effective approach, although not necessarily the lowest cost. Capital construction involves a multifaceted approach, which includes addressing administrative complexities, understanding specific requirements and job complexities, and effectively managing projects to ensure successful completion, taking into consideration a multitude of variables.

6-Staff-6

Ref: (1) VECC Interrogatories - 6-VECC-25

Preamble:

Wasaga Distribution noted that it obtained the services of a third-party firm to perform an appraisal on the Administrative Building rent. It is not clear from Appendix L referenced in 6-VECC-25 how the appraisal was done.

Question(s):

- a) Please clarify if the rent appraisal took into account inflationary costs over the 2021-2025 period and/or an increase in the number of WRSI employees in the space.

Response:

- a) The appraisal process is conducted at a specific moment in time and is independent of the number of employees. The appraisal assesses the value of the property. The appraisal does not account for the inflation or deflation costs of real estate.

6-Staff-7

Ref: (1) OEB Staff Interrogatories - 6-Staff-50
(2) Chapter 2 Appendices, Tab 2-BA
(3) 2024 PILs Workform, Tab B8

Preamble:

The total PP&E addition of \$3,907,206 is reported in Reference 2 in Cell F534 for 2023 compared to the total addition of \$3,926,355 reported in Reference 3 in Cell F43.

Question(s):

- a) Please reconcile the total PP&E additions for 2023 in Reference 2 with those in Reference 3.

Response:

- a) The 2024 PILS Workform Tab B8 has been update to reflect the 2023 additions in 2-BA. The RRWF has also been updated, along with the Tariff Schedule and Bill Impacts Model.

6-Staff-8

Ref: (1) OEB Staff Interrogatories - 6-Staff-51
(2) OEB Staff Interrogatories - Att 6-Staff-51 2024 PILs Workform

Preamble:

It appears that the PILs Workform attached to 6-Staff-51 is not based on the updated PILS model dated February 2.

Question(s):

- a) Please confirm the OEB staff's observation and update Reference 2 accordingly.

Response:

- a) The PILs Workform attached to 6-Staff-51 was submitted as a stand-alone document to reflect only the changes proposed in 6-Staff-51.

9-Staff-10

- Ref:
- (1) OEB Staff Interrogatories - 9-Staff-54, k)
 - (2) Exhibit 9, Table 9.7
 - (3) EB-2015-0107, Decision and Rate Order, page 39
 - (4) EB-2015-0107, Settlement 2016 PILs Workform

Preamble:

In its responses to the staff question in Reference 1, Wasaga Distribution notes that from 2016 to 2022, its actual paid PILs amounts per year have been significantly higher than the approved amount in the 2016 COS application. Wasaga Distribution states that the total variance equates to approximately \$801,452 in benefits to customers between 2016 and 2022.

In Reference 3, OEB staff notes that the approved grossed-up PILs amount in the 2016 COS application is \$44,957. According to Reference 4, the approved PILs amount is based on a combined effective tax rate of 24.96%.

OEB staff has reproduced the table in Reference 2 for the year-over-year comparison of the actual PILs to the OEB approved recovery amount:

Table 9.1: Year-over-year PILs Variance to 2016 Approved Recovery Amount

	Approved 2016	Actual 2016	Actual 2017	Actual 2018	Actual 2019	Actual 2020	Actual 2021	Actual 2022
Grossed up PILs	44,957	190,365	194,565	253,273	121,929	132,026	132,018	179,475
Variance to Approved		145,408	149,608	208,316	76,972	87,069	87,061	134,518
Total Variance to 2016 Approved								888,952

Question(s):

- a) Please confirm OEB staff’s calculation in the table above.
- b) Please explain why the actual PILs amounts from 2016 to 2022 are significantly higher than the approved PILs and quantify the main drivers for the variances each year.

Response:

- a) WDI confirms the OEB staff’s calculation in the table above. However, when we submitted table 9.7, we added the SRED credit back into the grossed up PILS amount, because we were dealing with the SRED credit as a separate issue.
- b) The actual PILs amounts from 2016 to 2022 are significantly higher than the approved PILs are due to the small business deduction. The small business deduction significantly

reduces WDI's proposed PILs in its COS application, when in reality WDI is unable to claim this deduction, resulting in a significant portion of PILs that WDI will never recover. WDI also pays PILs on income from its notional debt as well as any other non-regulated income.

9-Staff-11

Ref: (1) OEB Staff Interrogatories - 9-Staff-57, b)
(2) 2024 DVA Continuity Schedule
(3) Interrogatory Responses, Appendix E

Preamble:

In the responses to Reference 1, Wasaga Distribution provides the revised principal balance of \$483,521 for Account 1508, Sub-Account Pole Attachment Variance.

Question(s):

- a) Please update the balances reported in Reference 2 for Account 1508, Sub-Account Pole Attachment Variance based on the calculation provided in Reference 3.

Response:

- a) WDI has updated the balances reported in Reference 2 for Account 1508, Sub-Account Pole Attachment Variance based on the calculation provided in Reference 3.

9-Staff-12

Ref: (1) Exhibit 9, Table 9.4

Preamble:

In Reference 1, Wasaga Distribution has proposed to continue the following Group 2 accounts:

Account 1508, Sub-account OEB Cost Assessments
Account 1508, Sub-account Pole Attachment Variance

In the OEB letter dated February 9, 2016, regarding the revisions to the OEB Cost Assessment Model, the OEB expects regulated entities to seek disposition of the variance account balances when their rates, payment amounts or fees, as applicable, are next rebased/reset, and the accounts will be closed to any further entries at that time.

According to the July 20, 2018, Accounting Guidance on wireline pole attachment charges, the OEB expects the variance account must be closed after disposition of the last of the amounts that have been tracked once an LDC has had the new pole attachment charge incorporated in a cost-based rate application.

Question(s):

- a) Please explain why Wasaga Distribution proposes to continue the two sub-accounts mentioned above.

Response:

- a) WDI proposes to continue the two sub-accounts mentioned above as the 2023 variances have not been accounted for in this application. The DVA Continuity Schedule only accounts for variances until December 31, 2022, plus projected interest from January 1, 2023 to April 30, 2024.

SEC-26

REFERENCE: 1-SEC-1b

- a) Appendix N contains materials provided to Wasaga's Board in approving this application. In the 2024 Capital Budget Report submitted December 20, 2023, page 18 provides a list of six developments. Please provide an update on the status of each of the developments listed.

Response:

- a) The response is provided in the table below:

Project Name	Total Project Cost	WDI Contribution	Number of Lots	Executed Agreement and Securities	Update
Villas of Upper Wasaga Phase 4	\$625,543	\$93,405	85	Yes	Under construction
Golfview Estates	\$614,607	\$91,772	73	Yes	Ready for construction (on our end)
Sunnidale Trails Phase 1E - Stage 1	\$148,831	\$22,223	30	Yes	Under construction
River's Edge Phase 1 - Stage 2B	\$1,998,010	\$298,341	257	Submitted	We allocated this budget according to the progress made in this extensive development over the past few years. Design is approved; OTC has been submitted; waiting for the developer.
Golden Sands	\$749,462	\$111,909	103	No	This is in the final stage of Municipal approval. OTC is being prepared. According to communications with their consultant, the developer is eager to begin.
Bell Make Ready (for Golfview Estates)	\$15,027	\$0	0	N/A	Work can be scheduled; we have a signed agreement and approval for billing
Total Development	4,151,480	617,652	548		

SEC-27

REFERENCE: 2-Staff-8, 4-SEC-17 and 6-SEC-22

- a) Wasaga has provide 2023 updates based on actuals to September 2023. Please provide, as best you can, year end unaudited numbers for 2023 in Appendix 2-AA, 2-AB, 2-JA, 2-JB, 2-JD, 2-H and 2-K format.

Response:

- a) Due to the time crunch with completing and submitting IR responses, we only recently commenced our year-end close procedures and have yet to compile year-end numbers.

Because the last payroll run for 2023 was completed the first week of January 2-K was submitted on February 2, 2024, with actual values.

SEC-28

REFERENCE: 2-SEC-11

- a) Please explain the variance in capitalized OM&A capitalized/total net capital and why 2024 is higher than the average of 38%.

Response:

- a) The amount of capitalized OM&A is dependent on the gross assets that are capitalized in each year. For example, WDI capitalized its new \$4.8M sub-station in 2022, of which approximately 95% of the work was conducted by third-party contractors (not WRSI). Therefore, only a small amount of OM&A was capitalized in completing this station; resulting in a low proportion of capitalized OM&A to net assets, relative to other years. Furthermore, the amount of contributed capital does not influence the amount of capitalized OM&A. With that said, contributed capital does affect the proportion of capitalized OM&A to net assets. Overall, the year-over-year variance of capitalized OM&A to net assets can be explained by two factors:
- i. Dollar amount and nature of gross assets capitalized.
 - ii. Dollar amount of contributed capital received to fund the capitalized gross assets.

Regarding the 2024 proportion of capitalized OM&A to net assets, WDI originally applied the year-over-year annual growth rate to estimate 2024 capitalized OM&A. However, upon further review of the 2024 budget, WDI believes that this estimate is not in line with its current assumptions and capital plans for 2024. Therefore, WDI has revised the estimate for total capitalized OM&A in 2024 (please see table below).

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024
Net Capitalized Assets	\$886,606	\$905,782	\$1,151,893	\$1,436,812	\$1,616,113	\$1,972,577	\$4,286,657	\$3,207,205	\$3,351,764
Capitalized OM&A	\$367,133	\$422,102	\$413,614	\$451,543	\$693,159	\$896,824	\$878,641	\$1,210,334	\$1,299,339

SEC-29

REFERENCE: 4-SEC-18b

- a) Please explain what is included in charges under non-MSA and MSA Non-Labour, e.g., contracts, subscriptions, etc.

Response:

- a) MSA non-labour includes meetings/conferences, third-party service providers, office expenses, meter reading expenditures, customer billing related items, computer maintenance, vehicle expenses, etc.

Non-MSA expenses are charged directly to WDI and include locates software, property insurance, industry memberships, property taxes, LEAP, collecting fees, third-party directly related to WDI (i.e. audit fees, legal fees, and consulting), board expenses, regulatory expense, etc.

SEC-30

REFERENCE: 7-SEC-23 and 7-VECC-29

- a) Please rerun the Cost Allocation model with the Demand Allocators LTNCP1, SNNCP1, LTNCP4, SNNCP4 LTNCP12 and SNNCP12 for the GS > 50 kW class prorated by the number of customers in the Line Transformer Customer Base and Secondary Customer Base, i.e, by $25/37 = .676$.

Response:

- a) WDI has rerun the Cost Allocation model with the Demand Allocators LTNCP1, SNNCP1, LTNCP4, SNNCP4 LTNCP12 and SNNCP12 for the GS > 50 kW class prorated by the number of customers in the Line Transformer Customer Base and Secondary Customer Base, i.e, by $25/37 = .676$. This model has been saved as a separate Cost Allocation model titled WDI 2024 Cost Allocation Model_20240220_SEC-30.

VECC-33

REFERENCE: Staff 35 a)

IRR Load Forecast Model, Tab 4 and Tab 6

- a) It is noted that in the Load Forecast Model filed with the IRRs (Tab 4, Row 28): i) the adjusted 2023 customer count for Residential is based on the average of 12 months, ii) the adjusted 2023 customer count for GS<50 is based on the average of the 2023 February and November values and iii) the adjusted 2023 customer count for the balance of the classes is based on the average of the 2023 January and December values. Please explain the reason for the different approaches used.
- b) In Tab 6 (Column K) of the Load Forecast Model, please indicate what customer classes are included in the customer count variable.

Response:

- a) WDI acknowledges that this was an error and has revised the numbers such that all customer classes are based on the average of 12 months.
- b) The customer classes included in the customer count variable in Tab 6 are residential, GS<50, GS>50 (excluding wholesale market participants), and USL. Streetlights were also included; however, all streetlights were treated as 1 connection.

VECC-34

REFERENCE: IRR Cost Allocation Model
IRR RRWF

- a) It appears that the Cost Allocation Model filed with the IRRs (e.g., Tabs I6.1, I6.2, I7.1, I7.2, and I8) was not updated for the new Load Forecast that was filed with the IRRs. Please review and revise as required.
- b) As required, please update the RRWF and the 2024 Tariff Schedule and Bill Impacts to reflect the response to part (a).

Response:

- a) The Cost Allocation Model has been updated.
- b) The RRWF and 2024 Tariff Schedule and Bill Impacts has been updated to reflect the change in VECC-33. The models filed with the IRRs had the correct load forecast values.

**WASAGA DISTRIBUTION INC. (WDI)
2024 RATE APPLICATION (EB-2023-0055)
SETTLEMENT CLARIFICATION QUESTIONS**

1. Further discussions around IR 2-SEC-11 and IR clarification question SEC-28 resulted in WDI realizing that amount that they were capturing as Capitalized OM&A in appendix 2-K was incorrectly recorded. Appendix 2-K has been updated and filed within the Chapter 2 Appendices along with the settlement documents.
2. There was a clarification question regarding IR 4-SEC-18. Values filed as part of the original IR were from the original COS submission. During settlement the table was updated to reflect the IR values (which had decreased through IR responses). Further, an additional table was added to reflect the corporate overheads that are included in the line items.

The below table depicts the allocation of corporate overhead costs from WRSI to WDI OM&A under the MSA utilizing WDI's cost allocation model. We note that on quantifying the actual aggregate allocation of corporate overhead costs in the 2024 Test Year budget the aggregate percentage is 5.8% rather than the estimated 7% referred to in the interrogatory responses.

USoA	MSA Labour	MSA Non-Labour	Total MSA	Non-MSA	Total OM&A
5010			-	16,845	16,845
5016	13,250	345	13,595		13,595
5017		31,632	31,632		31,632
5070	9,492	305	9,796		9,796
5075		3,853	3,853	3,279	7,132
5105	88,768	89,129	177,896		177,896
5120	11,860	37,685	49,545	3,395	52,940
5125	84,399	36,910	121,308		121,308
5130	32,253	11,238	43,491		43,491
5135	115,727	104,430	220,157		220,157
5150	147,021	46,664	193,685	6,859	200,544
5155	87,615	57,764	145,379		145,379
5160	20,848	11,374	32,223		32,223
5175	12,633	21,549	34,182		34,182
5310	3,186	164,846	168,032		168,032
5315	191,001	468,047	659,048		659,048
5320	184,593	34,813	219,406	33,813	253,219
5330			-	869	869
5335			-	43,471	43,471
5410		4,605	4,605	15,281	19,886
5605	223,676	46,512	270,188	77,643	347,831
5610	333,775	82,962	416,736		416,736
5615	333,177	14,792	347,970		347,970
5620		62,197	62,197		62,197
5625			-	67,923	67,923

USoA	MSA Labour	MSA Non-Labour	Total MSA	Non-MSA	Total OM&A
5630		46,909	46,909	81,551	128,460
5635			-	26,192	26,192
5655			-	111,995	111,995
5665		7,075	7,075	135,844	142,919
5675	6,603	41,197	47,800	812	48,612
5675			-		-
5680		7,136	7,136		7,136
6205			-	7,170	7,170
Total	1,899,877	1,433,967	3,333,844	632,942	3,966,786

USoA	2024 Budget - With Corporate Allocations	2024 Budget - Without Corporate Allocations	Corporate Allocation	Allocation Rate
5016	\$ 13,595	\$ 13,250	\$ 345	2.6%
5020	\$ -	\$ -	\$ -	0.0%
5065	\$ -	\$ -	\$ -	0.0%
5070	\$ 9,796	\$ 9,492	\$ 305	3.2%
5105	\$ 91,076	\$ 88,768	\$ 2,308	2.6%
5120	\$ 12,169	\$ 11,860	\$ 308	2.6%
5125	\$ 86,593	\$ 84,399	\$ 2,194	2.6%
5125	\$ -	\$ -	\$ -	0.0%
5130	\$ 33,092	\$ 32,253	\$ 839	2.6%
5135	\$ 118,736	\$ 115,727	\$ 3,009	2.6%
5145	\$ -	\$ -	\$ -	0.0%
5150	\$ 150,843	\$ 147,021	\$ 3,823	2.6%
5155	\$ 89,893	\$ 87,615	\$ 2,278	2.6%
5160	\$ 21,390	\$ 20,848	\$ 542	2.6%
5175	\$ 12,962	\$ 12,633	\$ 328	2.6%
5310	\$ 3,312	\$ 3,186	\$ 126	3.9%
5315	\$ 198,528	\$ 191,001	\$ 7,527	3.9%
5320	\$ 191,868	\$ 184,593	\$ 7,275	3.9%
5410	\$ -	\$ -	\$ -	0.0%
5605	\$ 228,004	\$ 223,676	\$ 4,328	1.9%
5610	\$ 234,017	\$ 227,679	\$ 6,338	2.8%
5612	\$ 108,385	\$ 106,095	\$ 2,289	2.2%
5615	\$ 347,970	\$ 333,177	\$ 14,792	4.4%
5675	\$ 6,779	\$ 6,603	\$ 176	2.7%
5017	\$ 31,632	\$ 28,532	\$ 3,100	10.9%
5020	\$ -	\$ -	\$ -	0.0%

USoA	2024 Budget - With Corporate Allocations	2024 Budget - Without Corporate Allocations	Corporate Allocation	Allocation Rate
5065	\$ -	\$ -	\$ -	0.0%
5075	\$ 3,853	\$ 3,555	\$ 298	8.4%
5105	\$ 86,821	\$ 78,313	\$ 8,507	10.9%
5120	\$ 37,376	\$ 33,714	\$ 3,662	10.9%
5125	\$ 34,715	\$ 31,313	\$ 3,402	10.9%
5125	\$ -	\$ -	\$ -	0.0%
5130	\$ 10,400	\$ 9,381	\$ 1,019	10.9%
5135	\$ 101,421	\$ 91,483	\$ 9,938	10.9%
5145	\$ -	\$ -	\$ -	0.0%
5150	\$ 42,842	\$ 38,644	\$ 4,198	10.9%
5150	\$ -	\$ -	\$ -	0.0%
5155	\$ 55,486	\$ 50,049	\$ 5,437	10.9%
5160	\$ 10,832	\$ 9,771	\$ 1,061	10.9%
5175	\$ 21,220	\$ 19,141	\$ 2,079	10.9%
5310	\$ 164,720	\$ 153,819	\$ 10,902	7.1%
5315	\$ 460,520	\$ 430,042	\$ 30,478	7.1%
5320	\$ 27,538	\$ 25,716	\$ 1,823	7.1%
5410	\$ 4,605	\$ 4,300	\$ 305	7.1%
5605	\$ 42,184	\$ 34,150	\$ 8,034	23.5%
5610	\$ 57,915	\$ 50,877	\$ 7,038	13.8%
5612	\$ 16,420	\$ 14,155	\$ 2,265	16.0%
5615	\$ -	\$ -	\$ -	0.0%
5620	\$ 62,197	\$ 54,330	\$ 7,867	14.5%
5630	\$ 46,909	\$ 40,976	\$ 5,933	14.5%
5665	\$ 7,075	\$ 6,180	\$ 895	14.5%
5675	\$ 41,020	\$ 35,570	\$ 5,450	15.3%
5680	\$ 7,136	\$ 6,585	\$ 551	8.4%
	\$ 3,333,844	\$ 3,150,472	\$ 183,371	5.8%