

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 6, 2004
TO: Shevie Brown, Division of Competitive Markets and Enforcement
FROM: Denise N. Vandiver, Chief, Bureau of Auditing *DW*
Division of Regulatory Compliance and Consumer Assistance
RE: **Docket No.** 030004-GU; **Company Name:** City Gas Company of Florida;
Audit Purpose: Conservation Gas Cost Recovery Clause;
Audit Control No. 03-037-4-1

Attached is a revised copy of the final audit report for the utility stated above. Exception 1, pages 3 – 8 of the audit report were designated "confidential" and not distributed with the original report on July 25, 2003. This section of the audit report has been declassified and you are being provided with the complete report.

I am sending the utility a copy of this memo and the revised audit report. If the utility desires to file a response to the audit report, it should send the response to the Division of the Commission Clerk and Administrative Services.

DNV/jcp
Attachment

cc: Division of Auditing and Safety (Hoppe, District Offices, File Folder)
Division of the Commission Clerk and Administrative Services (2)
Division of Competitive Markets and Enforcement (Harvey)
General Counsel
Office of Public Counsel

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DOCUMENT NUMBER 030004-GU

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FLORIDA PUBLIC SERVICE COMMISSION


***DIVISION OF AUDITING & SAFETY
BUREAU OF AUDITING***

Miami District Office

**CITY GAS COMPANY OF FLORIDA
CONSERVATION COST RECOVERY CLAUSE
HISTORICAL YEAR END DECEMBER 31, 2002**

DOCKET NO.030004-GU

AUDIT CONTROL NO.03-037-4-1



Yen Ngo, Audit Manager



Kathy Welch, District Supervisor

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**DIVISION OF AUDITING & SAFETY
AUDITOR'S REPORT
July 3, 2003**

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described in this report to audit the Conservation Cost Recovery schedules for the historical 12-month period ended December 31, 2002 for City Gas Company. These schedules were prepared by the utility as part of its petition for Conservation Cost Recovery in Docket No.030004-GU. There is confidential information associated with this audit.

This is an internal accounting report prepared after performing a limited scope audit. Accordingly, this report should not be relied upon for any purpose except to assist the Commission staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

SUMMARY OF SIGNIFICANT PROCEDURES

Our audit was performed by examining, on a test basis, certain transactions and account balances which we believe are sufficient to base our opinion. Our examination did not entail a complete review of all financial transactions of the company. Our more important audit procedures are summarized below. The following definitions apply when used in this report:

Scanned - The documents or accounts were read quickly looking for obvious errors.

Compiled - The exhibit amounts were reconciled with the general ledger, and accounts were scanned for errors or inconsistency.

Reviewed - The exhibit amounts were reconciled with the general ledger, The general account balances were traced to the subsidiary ledgers, and selective analytical review procedures were applied.

Examined - The exhibit amounts were reconciled with the general ledger. The general account balances were traced to the subsidiary ledgers. Selective analytical review procedures were applied, and account balances were tested to the extent further described.

Confirmed - Evidential matter supporting an account balance, transaction, or other information was obtained directly from an independent third party.

Verified - The item was tested for accuracy, and substantiating documentation was examined.

REVENUES: Examined the revenues from the general ledger and reconciled them to the Company schedules CT-3. Compiled the terms sold from the company's revenue worksheets and applied the applicable rate factors approved in Commission orders. Reconciled the revenue calculation to the company's CT-3 schedules. Recomputed bills for various rate classes to determine that the applicable factor was actually charged.

EXPENSES: Examined expense amounts in the general ledger and reconciled them to the company's CT-3 schedules. Staff tested 100% of all advertising expenses by tracing to the invoices and advertisements. From the company's prepaid printout of incentives, staff pulled a judgmental sample. The incentive expenses were traced to vouchers, invoices, and sales contracts. Benefits, payroll, and common costs were also tested through sample selection.

TRUE-UP: Recalculated the true-up and verified the beginning true-up to the orders and the interest rates to the Wall Street Journal.

II. EXCEPTIONS

Exception No.1

Subject: Payroll

Statement of Fact: The payroll for the months of February, May, and November 2002 were selected for testing. The hours of the employees recorded in the "Payroll Report" were compared to individual "Monthly Time Voucher". The following discrepancies were found:

1. Richard Carlson distributes his time between ECP1, ECP3, and ECP Common Cost. The ECP Labor Report incorrectly recorded the hours for the months of February and May 2002. See adjustments on the attached schedule.
2. Ramiro Sicre allocates his time between ECP1, ECP3, ECP2, ECP7, ECP8, and ECP9. The ECP Labor Report allocated the hours to the incorrect energy conservation programs. See correction on the attached schedule.
3. Carmine Laurice allocated 2 hours to ECP9 (account 602.134) for the months of May and November 2002, which did not display in the Payroll Labor Report.
4. The Payroll Labor Report did not record Geri Boyes' 72 hours to ECP2 (account 602.134) for the first paid period of November 2002.
5. The Labor Report recorded 5 and 1.75 hours more than the hours that were reported in the Mary Pelkey's Time Sheet for the months of February and May 2002.
6. There were various discrepancies between the ECP Labor Report & Ellowelynn Reilly's Time Sheet for February, May, November 2002. See the adjustments on the following page.
7. The ECP Labor Report did not deduct 9.75 hours that were taken off by Acela Robaina in May 2002.
Also, Acela Robaina was paid an additional \$500.00 (1,138.61-638.61) for the period. The \$500.00 was payment for the referral of a meter reading employee to the company, which was not conservation related expense.

See the adjustments and revised true-up schedule on the following page.

Recommendation: The total amount to be added payroll and benefits is \$4,288.00. The revised interest provision should be increased by \$23.00. The revised total net true-up and interest should be increased by \$4,311.00 (4,288.00+23.00).

Due to time constraints, staff was unable to test the entire 2002 year end payroll. Since similar discrepancies also occurred in prior audits RGO #01-068-4-1, Docket No. 010004-Gu and AUS #02-057-4-2, Docket No.02004-EG, internal control over the recording of the

payroll should be examined to prevent future mistakes. Furthermore, the company should revise all months payroll and provide it to the Commission.

Exception No.1- Payroll Adjustments

Employee	Month	Hour	Hourly Rate	Total	Account No.
FEBRUARY 2002					
Richard Carlson	02/07/2002	(24.00)	38.98	(935.44)	MKT RES & PLN (602.188)
	02/07/2002	<u>24.00</u>	38.98	935.44	ECP3 (602.118)
		0.00			
Ramiro Sicre	02/21/2002	(10.00)	33.95	(339.46)	ECP3 (602.118)
	02/21/2002	<u>10.00</u>	33.95	339.46	ECP9 (602.134)
		0.00			
Mary Pelkey	02/07/2002	(1.00)	11.38	(11.38)	EPC1 (602.096)
	02/21/2002	<u>6.00</u>	11.38	68.27	EPC1 (602.096)
		5.00			
Ellovenlynn Reilly	02/21/2002	3.00	9.99	29.97	EPC1 (602.096)
		<u>4.00</u>	9.99	39.96	ECP3 (602.118)
TOTAL PAYROLL				126.83	
PERCENTAGE ALLOCATED TO BENEFIT				<u>35.00%</u>	SEE NOTE
TOTAL BENEFIT				<u>44.39</u>	
TOTAL PAYROLL & BENEFIT				<u>171.21</u>	

Exception No.1- Payroll Adjustments

Employee	Month	Hour	Hourly Rate	Total	Account No.
MAY 2002					
Richard Carlson	05/16/2002	16.00	38.98	623.63	ECP1 (602.096)
	05/16/2002	8.00	38.98	311.81	ECP3 (602.118)
	05/16/2002	24.00	38.98	935.44	ECP COMMON (602.138)
		<u>48.00</u>			
Carmine Laurice	05/16/2002	2.00	23.40	46.80	ECP10 (602.135)
Mary Pelkey	05/02/2002	(1.75)	11.38	(19.91)	EPC1 (602.096)
Ellovenlynn Reilly	05/30/2002	(1.00)	9.99	(9.99)	ECP1 (602.096)
		4.00	9.99	39.96	ECP3 (602.118)
		(3.00)	9.99	(29.97)	ECP9 (602.134)
		<u>0.00</u>			
Acela Robaina	05/02/2002	(4.25)	16.47	(70.00)	ECP7 (602.132)
	05/16/2002	(0.50)	16.47	(8.24)	ECP7 (602.132)
				(500.00)	ECP7 (602.132)
	05/30/2002	(5.00)	16.47	(82.35)	ECP7 (602.132)
TOTAL PAYROLL				1,237.18	
PERCENTAGE ALLOCATED TO BENEFIT				<u>35.00%</u>	SEE NOTE
TOTAL BENEFIT				<u>433.01</u>	
TOTAL PAYROLL & BENEFIT				<u>1,670.19</u>	

Exception No.1- Payroll Adjustments

Employee	Month	Hour	Hourly Rate	Total	Account No.
NOVEMBER 2002					
Carmine Laurice	11/27/2002	2.00	23.40	46.80	ECP9 (602.134)
Geri Boyles	11/14/2002	48.00	22.95	1,101.70	ECP2 (602.107)
	11/14/2002	24.00	22.95	550.85	ECP2 (602.107)
		<u>72.00</u>			
Ellowenlynn Reilly	11/27/2002	(2.00)	9.99	(19.98)	ECP1 (602.096)
		2.00	9.99	19.98	ECP9 (602.134)
		<u>0.00</u>			
TOTAL PAYROLL				1,699.35	
PERCENTAGE ALLOCATED TO BENEFIT				<u>44.00%</u>	SEE NOTE
TOTAL BENEFIT				<u>747.71</u>	
TOTAL PAYROLL & BENEFIT				<u>2,447.06</u>	
TOTAL ADJUSTMENT OF PAYROLL & BENEFIT				<u><u>4,288.46</u></u>	

NOTE: The benefits factor increased from 36.00% to 46.23% at the beginning of the company's fiscal year of October 1, 2002. However, the recalculation of the benefits from the general ledger revealed 35% was applied from 1/02 to 9/02 and 44% from 10/02 to 12/02. Thus, these percentages were used in calculating the payroll adjustment.

MONTHLY PAYROLL ADJUSTMENTS

Month	Employees	602.096 ECP 1	602.107 ECP2	602.118 ECP3	602.132 ECP7	602.133 ECP8	602.134 ECP9	602.135 ECP10	602.138 COMMON	602.188 MKT RES & PLN	TOTAL
Feb 02											
	Richard Carlson			935.44						(935.44)	0.00
	Ramiro Sicre			(339.46)			339.46				0.00
	Mary Pelkey	56.89									56.89
	Ellowenly Reilly	29.97		39.96							69.94
	Adjustments	86.86	0.00	635.94	0.00	0.00	339.46	0.00	0.00	(935.44)	126.83
35.00%	Adjusted Benefit	30.40		222.58			118.81			(327.40)	44.39
		117.26		858.52			458.27			(1,262.84)	171.21
	Per Labor Report Payroll	7,265.26		5,068.68			17,683.04			1,864.11	31,881.09
	Adjusted Payroll & Benefit	7,382.52		5,927.20			18,141.31			601.27	32,052.30
May 02											
	Richard Carlson	623.63		311.81					935.44		1,870.88
	Carmine Laurice							46.80			46.80
	Mary Pelkey	(19.91)									(19.91)
	Ellowenly Reilly	(9.99)		39.96			(29.97)				0.00
	Acela Robaina				(660.58)						(660.58)
	Adjustments	593.72	0.00	351.78	(660.58)		(29.97)	46.80	935.44	0.00	1,237.18
35.00%	Adjusted Benefit	207.80		123.12	(231.20)		(10.49)	16.38	327.40		433.01
		801.53		474.90	(891.79)		(40.46)	63.18	1,262.84		1,670.19
	Per Labor Report Payroll	10,575.49		7,828.13	3,452.50		23,393.43	327.57	2,667.66		48,244.78
	Adjusted Payroll & Benefit	11,377.02	0.00	8,303.03	2,560.71	0.00	23,352.97	390.75	3,930.50	0.00	49,914.97
November 02											
	Carmine Laurice						46.80				46.80
	Geri Boyles		1,652.55								1,652.55
	Ellowenly Reilly	(19.98)					19.98				0.00
	Adjustments	(19.98)	1,652.55	0.00	0.00	0.00	66.78	0.00	0.00	0.00	1,699.35
44.00%	Adjusted Benefit	(8.79)	727.12				29.38				747.71
		(28.77)	2,379.67				96.16				2,447.06
	Per Labor Report Payroll	8,271.42	478.59				14,056.26				22,806.27
	Adjusted Payroll & Benefit	8,242.65	2,858.26	0.00	0.00	0.00	14,152.42	0.00	0.00	0.00	25,253.33
	Total Payroll & Benefit Adjustments	890.01	2,379.67	1,333.42	(891.79)	0.00	513.97	63.18	1,262.84	(1,262.84)	4,288.46

Interest Rates per Wall Street Journal Commercial Paper Interest- first day reporting 30 day commercial paper rate per Tallahassee memo

January 2002	Month 1	1.780%	July 2002	Month 7	1.750%
February 2002	Month 2	1.770%	August 2002	Month 8	1.730%
March 2002	Month 3	1.750%	September 200	Month 9	1.710%
April 2002	Month 4	1.800%	October 2002	Month 10	1.780%
May 2002	Month 5	1.750%	November 200	Month 11	1.650%
June 2002	Month 6	1.770%	December 200	Month 12	1.300%

Interest- first day reporting of subsequent month January 2003 1.280%

INTEREST RATES

	2002 JAN	2002 FEB	2002 MARCH	2002 APRIL	2002 MAY	2002 JUNE	2002 JULY	2002 AUGUST	2002 SEPTEMBER	2002 OCTOBER	2002 NOVEMBER	2002 DECEMBER	TOTAL
Beginning	1.780%	1.770%	1.750%	1.800%	1.750%	1.770%	1.750%	1.730%	1.710%	1.780%	1.650%	1.300%	
Ending	1.770%	1.750%	1.800%	1.750%	1.770%	1.750%	1.730%	1.710%	1.760%	1.650%	1.300%	1.200%	
Total	3.550%	3.520%	3.550%	3.550%	3.520%	3.520%	3.480%	3.440%	3.470%	3.410%	2.950%	2.590%	
Average	1.775%	1.760%	1.775%	1.775%	1.780%	1.780%	1.740%	1.720%	1.735%	1.705%	1.475%	1.285%	
Monthly Average	0.148%	0.147%	0.148%	0.148%	0.147%	0.147%	0.145%	0.143%	0.145%	0.142%	0.123%	0.108%	

CALCULATION OF TRUE-UP

Total Revenues-net of tax, (Line 4)	(185,500)	(163,497)	(172,018)	(132,498)	(124,756)	(128,309)	(126,299)	(129,134)	(119,736)	(121,672)	(140,124)	(163,898)	(1,697,441)
Prior True-up (Line 5)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(745,761)
Total revenue to current period	(247,647)	(225,644)	(234,165)	(194,645)	(186,903)	(190,456)	(188,446)	(191,281)	(181,883)	(183,819)	(202,271)	(216,045)	(2,443,202)
Conservation Expenses (Line 7)	186,441	192,771	165,039	182,304	172,039	158,704	202,060	197,153	176,626	181,420	152,822	200,711	2,168,090
Payroll Adjustments		171			1,670						2,447		4,288
Adjusted Conservation Expense	186,441	192,942	165,039	182,304	173,709	158,704	202,060	197,153	176,626	181,420	155,269	200,711	
True-up this period (Line 8)	(61,206)	(32,702)	(69,126)	(12,341)	(13,194)	(31,752)	13,614	5,872	(5,257)	(2,399)	(47,002)	(15,334)	(270,824)
Interest provision (Line 9)	(1,102)	(1,072)	(1,067)	(1,036)	(957)	(900)	(814)	(703)	(620)	(527)	(411)	(327)	(9,536)
True-up & Interest beginning (Line 10)	(745,761)	(745,922)	(717,550)	(725,595)	(676,826)	(628,829)	(599,334)	(524,387)	(457,071)	(400,801)	(341,580)	(326,845)	
Prior true-up coll. refunded	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	745,761
Total net true-up (Revised)	(745,622)	(717,550)	(725,595)	(676,826)	(628,829)	(599,334)	(524,387)	(457,071)	(400,801)	(341,580)	(326,845)	(280,360)	
True-up for the month CO. FILING	(745,923)	(717,724)	(725,768)	(676,968)	(630,675)	(601,182)	(526,237)	(458,825)	(402,657)	(343,439)	(331,155)	(284,671)	
Difference	1	174	173	172	1,846	1,848	1,850	1,854	1,856	1,859	4,310	4,311	

CALCULATION OF INTEREST

Beginning true up and int.	(745,761)	(745,922)	(717,550)	(725,595)	(676,826)	(628,829)	(599,334)	(524,387)	(457,071)	(400,801)	(341,580)	(326,845)	(6,890,502)
Ending true-up before int	(744,820)	(716,477)	(724,529)	(675,789)	(627,872)	(598,434)	(523,573)	(456,368)	(400,181)	(341,053)	(328,435)	(280,032)	(6,415,564)
Total	(1,490,581)	(1,462,400)	(1,442,079)	(1,401,384)	(1,304,698)	(1,227,263)	(1,122,907)	(980,756)	(857,252)	(741,854)	(668,015)	(606,878)	(13,306,066)
Average true up	(745,291)	(731,200)	(721,039)	(700,692)	(652,349)	(613,632)	(561,454)	(490,378)	(428,626)	(370,927)	(334,007)	(303,439)	(6,653,033)
Interest rate per above	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.15%	0.14%	0.14%	0.14%	0.12%	0.11%	
Interest per staff	(1,102)	(1,072)	(1,067)	(1,036)	(957)	(900)	(814)	(703)	(620)	(527)	(411)	(327)	(9,536)
True-up for the month per (WP 2) Company's Fill	(1,102)	(1,073)	(1,067)	(1,037)	(958)	(903)	(817)	(706)	(622)	(530)	(414)	(329)	(9,558)
Difference	0	1	0	1	1	3	3	3	2	3	3	2	22

Source: Company prepared schedule A-2

III. DISCLOSURES

Disclosure No. 1

Subject: Incentives

Statement of Fact: The company incorrectly booked the ECP3 incentives to ECP7 incentives. The following mistakes were discovered based on random sample testing:

<u>Sample Item No.</u>	<u>Program</u>	<u>Date</u>	<u>Amount Booked</u>	<u>Amount Removed</u>
19	ECP7	1/31/02	3,625.00	1,575.00
20	ECP7	2/28/02	1,575.00	<u>525.00</u>
Total to be booked to ECP3 (Account 606.877)				<u><u>2,100.00</u></u>

Since the adjustment results in the transferring of the incentive expense from ECP7 to EC3, the outcome does not affect the final true-up.

IV. EXHIBITS

ACTUAL CONSERVATION PROGRAM COSTS PER PROGRAM
JANUARY 2002 THROUGH DECEMBER 2002

PROGRAM NAME	CAPITAL INVESTMENT	PAYROLL & BENEFITS	MATERIALS & SUPPLIES	ADVERTISING	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
PROGRAM 1: SINGLE FAMILY HOME BUILDER	-	123,685	-	15,883	1,099,602	-	9,399	-	1,248,569
PROGRAM 2: MULTI FAMILY HOME BUILDER	-	9,849	-	-	16,706	-	1,717	-	28,272
PROGRAM 3: ELECTRIC REPLACEMENT	-	88,767	-	89,116	91,457	-	5,311	-	274,651
PROGRAM 4: DEALER PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 5: SCHOOLS PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 6: PROPANE CONVERSION	-	14	-	-	-	-	75	-	89
PROGRAM 7: WATER HEATER RETENTION	-	29,848	-	-	32,125	-	1,364	-	63,337
PROGRAM 8: RESIDENTIAL CUT AND CAP	-	14,632	-	-	3,768	-	814	-	19,214
PROGRAM 9: COMM/IND CONVERSION	-	264,157	-	-	21,317	-	13,091	-	298,565
PROGRAM 10: ALTERNATIVE TECHNOLOGY	-	4,672	-	2,450	-	-	1,603	-	8,725
COMMON COSTS	-	36,532	-	149,715	-	39,330	1,091	-	226,668
TOTAL TOTAL OF ALL PROGRAMS	-	572,156	-	257,164	1,264,975	39,330	34,465	-	2,168,090

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ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION
JANUARY 2002 THROUGH DECEMBER 2002

	Jan-02	Feb-02	Mar-02	Apr-02	May-02	Jun-02	Jul-02	Aug-02	Sep-02	Oct-02	Nov-02	Dec-02	Total
1 RCS AUDIT FEES	-	-	-	-	-	-	-	-	-	-	-	-	-
2 OTHER PROGRAM REVS	-	-	-	-	-	-	-	-	-	-	-	-	-
3 CONSERV ADJ REVS	(185,501)	(163,497)	(172,018)	(132,498)	(124,757)	(128,309)	(126,298)	(129,135)	(119,736)	(121,672)	(140,124)	(153,898)	(1,697,443)
4 TOTAL REVENUES	(185,501)	(163,497)	(172,018)	(132,498)	(124,757)	(128,309)	(126,298)	(129,135)	(119,736)	(121,672)	(140,124)	(153,898)	(1,697,443)
5 PRIOR PERIOD TRUE UP NOT APPLICABLE TO THIS PERIOD	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,147)	(62,144)	(745,761)
6 CONSERVATION REVENUES APPLICABLE TO THE PERIOD	(247,648)	(225,644)	(234,185)	(194,645)	(186,904)	(190,456)	(188,445)	(191,282)	(181,883)	(183,819)	(202,271)	(216,042)	(2,443,204)
7 CONSERVATION EXPENSES (FROM CT-3, PAGE 1)	186,441	192,771	185,039	182,304	172,039	158,704	202,080	197,153	176,626	181,420	152,822	200,711	2,168,090
8 TRUE-UP THIS PERIOD	(61,207)	(32,873)	(69,126)	(12,341)	(14,865)	(31,752)	13,615	5,871	(5,257)	(2,399)	(49,449)	(15,331)	(275,114)
9 INTEREST PROVISION THIS PERIOD (FROM CT-3 PAGE 3)	(1,102)	(1,073)	(1,067)	(1,037)	(958)	(903)	(817)	(706)	(622)	(530)	(414)	(329)	(9,557)
10 TRUE-UP & INTER PROV BEGINNING OF MONTH	(745,761)	(745,923)	(717,722)	(725,768)	(676,998)	(630,675)	(601,182)	(526,237)	(458,925)	(402,657)	(343,439)	(331,155)	
11 PRIOR PERIOD TRUE UP COLLECTED/(REFUNDED)	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,147	62,144	
12 TOTAL NET TRUE UP (SUM LINES 8+9+10+11)	(745,923)	(717,722)	(725,768)	(676,998)	(630,675)	(601,182)	(526,237)	(458,925)	(402,657)	(343,439)	(331,155)	(284,671)	(284,671)

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CALCULATION OF TRUE-UP AND INTEREST PROVISION
JANUARY 2002 THROUGH DECEMBER 2002

	Jan-02	Feb-02	Mar-02	Apr-02	May-02	Jun-02	Jul-02	Aug-02	Sep-02	Oct-02	Nov-02	Dec-02	Total
1. INTEREST PROVISION BEGINNING TRUE-UP	(745,761)	(745,923)	(717,722)	(725,788)	(676,998)	(630,675)	(801,182)	(526,237)	(458,925)	(402,657)	(343,439)	(331,155)	
2. ENDING TRUE-UP BEFORE INTEREST	(744,821)	(716,649)	(724,701)	(675,962)	(629,716)	(600,280)	(525,420)	(458,219)	(402,035)	(342,909)	(330,741)	(284,342)	
3. TOTAL BEGINNING & ENDING TRUE-UP	(1,490,582)	(1,462,573)	(1,442,423)	(1,401,730)	(1,306,715)	(1,230,954)	(1,126,603)	(984,456)	(860,959)	(745,586)	(674,180)	(615,497)	
4. AVERAGE TRUE-UP* (LINE 3 TIMES 50%)	(745,291)	(731,286)	(721,211)	(700,865)	(653,357)	(615,477)	(563,301)	(492,228)	(430,480)	(372,783)	(337,090)	(307,749)	
5. INTER. RATE - 1ST DAY OF REPORTING MONTH	1.780%	1.770%	1.750%	1.800%	1.750%	1.770%	1.750%	1.730%	1.710%	1.760%	1.650%	1.300%	
6. INTER. RATE - 1ST DAY OF SUBSEQUENT MONTH	1.770%	1.750%	1.800%	1.750%	1.770%	1.750%	1.730%	1.710%	1.760%	1.650%	1.300%	1.290%	
7. TOTAL (SUM LINES 5 & 6)	3.550%	3.520%	3.550%	3.550%	3.520%	3.520%	3.480%	3.440%	3.470%	3.410%	2.950%	2.590%	
8. AVG INTEREST RATE (LINE 7 TIMES 50%)	1.775%	1.760%	1.775%	1.775%	1.760%	1.760%	1.740%	1.720%	1.735%	1.705%	1.475%	1.295%	
9. MONTHLY AVG INTEREST RATE	0.148%	0.147%	0.148%	0.148%	0.147%	0.147%	0.145%	0.143%	0.145%	0.142%	0.123%	0.108%	
10. INTEREST PROVISION (LINE 4 TIMES LINE 9)	(1,102)	(1,073)	(1,067)	(1,037)	(958)	(903)	(817)	(706)	(622)	(530)	(414)	(329)	(9,557)
10. a INT ADJ													

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