GUNSTER

ATTORNEYS AT LAW

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July 30, 2021

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: [*New Filing*] – Petition of Florida City Gas for Approval of Variance to Modify the Sebastian Area Extension Program True-Up and Extend the Amortization Period

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida City Gas's Petition for Approval of Variance to Modify the Sebastian Area Extension Program True-Up and Extend the Amortization Period.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions or concerns.

Sincerely,

Beth Keating

Beth Keating
Gunster, Yoakley & Stewart, P.A.
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Tallahassee, FL 32301
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MEK

Cc:// Office of Public Counsel (Gentry)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Florida City Gas Petition for Approval of Variance to Modify the Sebastian Area Extension Program True-Up and Extend the Amortization Period	Docket No. ________ Filed: July 30, 2021

PETITION OF FLORIDA CITY GAS FOR APPROVAL OF VARIANCE TO MODIFY THE SEBASTIAN AREA EXTENSION PROGRAM TRUE-UP AND EXTEND THE AMORTIZATION PERIOD

Florida City Gas ("FCG" or "the Company") hereby submits this petition to the Florida Public Service Commission ("Commission" or "FPSC") and requests, pursuant to Sections 366.04 and 366.05, Fla. Stat., approval of a limited variance of the requirements of FCG's tariffed Area Extension Program ("AEP") to allow FCG to take steps to mitigate the impact of the AEP surcharge true-up on the customers of the Sebastian AEP Project. Specifically, FCG seeks Commission approval of the following modifications to the Sebastian AEP Project surcharge: (a) waive the year seven true-up and retain the current AEP surcharge subject to future true-ups; (b) extend the amortization period from ten years to fifteen years subject to earlier termination of the AEP surcharge upon full payment of the balance to be recovered through the AEP; and (c) retain the year nine true-up per the tariff and add true-ups for years thirteen and fourteen. For the reasons explained below, FCG submits that the proposed modifications to the Sebastian AEP Project surcharge are reasonable and appropriate to minimize rate shock due to the year seven true-up provided in the AEP tariff, and to take advantage of forecasted usage and future new customers that may take service from the Sebastian AEP Project. In support thereof, FCG states as follows:

I. INTRODUCTION

1. The Company is a natural gas utility with its principal office located at:

Florida City Gas
4045 NW 97th Avenue
Doral, Florida 33178

2. Any pleading, motion, notice, order or other document required to be served upon FCG or filed by any party to this proceeding should be served upon the following individuals:

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3. FCG is a natural gas local distribution company that currently serves approximately 116,000 residential, commercial and industrial natural gas customers in Florida's Miami-Dade, Broward, St. Lucie, Indian River, Brevard, Palm Beach, Hendry, and Martin Counties. FCG is a "public utility" as that term is defined in Section 366.02, Fla. Stat., subject to the regulatory jurisdiction of the Commission.

4. By this petition, FCG seeks the Commission's approval of a limited variance of its AEP tariff to allow FCG to extend the amortization period and modify the true-ups for the Sebastian AEP Project surcharge.

5. Unlike rule waivers and variances, there is no set legal standard for tariff waivers or variances. *See In re: Petition for temporary variance from or waiver of Rule 25-6.097(3), F.A.C., temporary waiver of Section 6.3 of tariff, and request for expedited ruling, by Florida Power & Light Company*, Order No. PSC-2020-0399-PAA-EI, Docket No. 20200211-EI (FPSC Oct. 26, 2020). The Commission has stated that the burden is on the utility to provide sufficient justification for a requested tariff variance or modification. *See In Re: Petition for variance & waiver of certain contractual requirements in Rule 25-6.065, F.A.C., by Progress Energy Florida., Inc.*, Order No. PSC-2012-0173-PAA-EI, Docket No. 20120012-EI (FPSC Apr. 12, 2012).

6. The Commission has broad jurisdiction, including jurisdiction to grant the relief requested herein, under Sections 366.04, 366.05, and 366.07, Fla. Stat., pursuant to which the Commission is authorized to establish rates and charges for public utilities, and in doing so, to consider, among other things, whether the rules, regulations and practices of the utility are fair and reasonable. The Company is unaware of any material facts in dispute in this regard. This is a Petition representing an initial request to the Commission, which is the affected agency located at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399.

II. <u>BACKGROUND</u>

7. Historically, main extensions to serve customers have been recovered directly from the customer(s) for whom the extension is made if the cost of such extension exceeds a certain cost/benefit calculation known as the Maximum Allowable Construction Cost ("MACC"), which is set forth in Rule 25-7.054, F.A.C. Under the Rule, the cost to extend service is free to the customer if it does not exceed the MACC. If, however, the cost of the extension exceeds the MACC, then the Rule contemplates that the utility require that the customer pay a non-interest bearing advance to cover the differential between the MACC and the project costs, which is referred to as the "Contribution In Aid of Construction" or CIAC.

8. In 1995, to promote economic development and to provide a more practical tool to expand service to unserved and underserved areas, FCG obtained approval of an alternative approach which has facilitated main extensions that would have otherwise been in doubt were traditional CIAC required. Specifically, FCG obtained approval to: (1) adjust its calculation of the MACC to six times the annual margin revenues to be derived from the facilities; and (2) implement the AEP to facilitate certain extensions that might not otherwise be made if the traditional CIAC were required. *See In Re: Petition for approval of tariffs governing extension of*

facilities by City Gas Company of Florida, Order No. PSC-95-0506-FOF-GU, Docket No. 950206-GU (FPSC Apr. 24, 1995).

9. As set forth in FCG's AEP tariff, an extension is eligible for the AEP if: (1) the extension is designed to serve a discrete geographic area; and (2) FCG reasonably forecasts that Margin Revenues plus the AEP surcharge will be sufficient to recover the costs of the extension over a ten-year period, which is referred to in the tariff as the "Amortization Period." However, FCG's AEP tariff also provides that the length of the Amortization Period may be modified upon approval by the Commission.

10. Under the AEP, recovery of qualifying main extension costs in excess of the MACC is accomplished through a per therm surcharge applied to the bills of customers served by the extension project. The AEP surcharge is calculated by dividing (1) the amount of additional revenues required in excess of the Company's tariffed rates by (2) the volume of gas reasonably forecast to be sold or transported to customers within the geographic area over the Amortization Period. The additional revenues required include the main extension costs above the MACC plus the Company's allowed cost of capital.

11. The amounts collected under the AEP are used to amortize the costs of the project that exceed the MACC. If the amounts collected under the AEP recover the main extension costs above the MACC before the expiration of the Amortization Period, the AEP is terminated. In addition, any amounts collected in excess of the main extension costs above the MACC shall be promptly credited or refunded to customers.

12. The AEP tariff also includes a true-up mechanism that occurs up to four times during the Amortization Period. The first true-up takes place at the earlier of (i) the third anniversary of the date when the project facilities are placed in service and (ii) the date on which

80% of the originally forecast annual load is connected to the project. The remainder of the true-ups under the AEP tariff are performed on the fifth, seventh, and ninth anniversary of the date when the project facilities were originally placed in service. During these true-ups, FCG reassesses the amount of additional revenues necessary to recover the balance of the excess cost of the facilities and recalculates the AEP surcharge. The resulting revised AEP surcharge is then applied to the bills of customers served by the extension project for the remainder of the Amortization Period.

13. FCG's current Commission-approved AEP tariff is set forth on First Revised Sheet No. 18 and Original Sheet No. 19 of FCG's tariff, which provided as **Attachment 1**.

III. SEBASTIAN AEP PROJECT

14. The Sebastian AEP Project was largely designed to serve commercial and industrial customers in the Sebastian–Vero Beach area that intended to convert their operations and energy needs from fossil fuels to natural gas, as well as to serve new residential, commercial, and industrial customers anticipated to connect to the Sebastian AEP Project over time.

15. The extension cost projections exceeded FCG's MACC, which, as noted above, is set at six times the annual margin revenues to be derived from the facilities. Thus, FCG would have had to collect a CIAC in order to cover the cost of the facilities that exceeded the MACC. FCG determined, however, that the extension was eligible for the Company's AEP.

16. The Sebastian AEP Project was initially placed in-service in December of 2014. The total project cost is $2,436,863 and the MACC was estimated to be $1,212,545. Thus, the differential between the total cost of the Sebastian AEP Project and the MACC was $1,224,318. This amount, plus the Company's allowed cost of capital or carrying charge, is to be recovered through the AEP surcharge.

17. The AEP surcharge was calculated based on a forecast of 80 new natural gas customers over the ten-year Amortization Period (increasing from fifteen customers forecasted in

year one to eighty customers forecasted in year ten). The gas volumes were forecasted to gradually increase each year during the ten-year Amortization Period based on the forecasted customer type, estimated customer usage, and estimated date of the customer's conversion to natural gas, with a total forecasted gas volume of approximately 808,900 therms annually by the tenth and final year of the Amortization Period.

18. The rates of new customer growth and conversion to natural gas in the Sebastian–Vero Beach area have been much slower than originally forecasted. For example, one major commercial customer with significant expected load and usage, which represents approximately 29% of the total forecast volumes, was originally forecasted to convert to natural gas early during the ten-year Amortization Period, However, the commercial customer experienced significant unforeseen delays in obtaining the equipment necessary to convert to natural gas, which resulted in much lower volumes and revenues during the first six years of the Amortization Period.[1] The economic impact of the COVID-19 pandemic has also been a factor that contributed to delayed development in the area, low conversion rates, and lower customer usage volumes.

19. As a result of the slower than expected customer growth and conversion rates, the actual number of customers and volumes have been significantly lower than originally forecasted for the Sebastian AEP Project. Provided as **Attachment 2** is a comparison of the forecasted and actual customers and volumes for the Sebastian AEP Project as of year-end 2020.

20. In accordance with the AEP tariff, the surcharge for the Sebastian AEP Project is scheduled for its year seven true-up recalculation in December 2021. Based on the volumes and

[1] Although this customer is projected to realize significant savings by switching to natural gas, their conversion to natural gas is not expected to be completed until sometime during year seven of the ten-year Amortization Period due to these delays.

revenues as of May 31, 2021, there is a remaining balance of $1,094,587, inclusive of carrying costs, to be recovered through the AEP. Provided as **Attachment 3** is a summary of the revenues, carrying costs, and ending recoverable balance for the Sebastian AEP Project as of May 31, 2021. In order to recover the remaining investment, the year seven true-up recalculation of the AEP surcharge would result in an increase from the current $0.4638/therm to $1.3851/therm (an increase of approximately 197%), which would be applied to customer bills beginning January 2022 through December 2024.

21. While recalculating and applying the significantly higher AEP surcharge would be consistent with FCG's tariff, FCG submits that such a dramatic increase would be uneconomical for most customers served by the Sebastian AEP Project, is likely to lead to existing customers switching to alternative fuel sources or relocating their operations, and would discourage new customers and conversions. This could, in turn, cause further rate shock for the remaining customers at the next true-up.

22. For these reasons, FCG respectfully requests that the Commission allow FCG to deviate from its AEP tariff requirements in this limited instance in order to mitigate the impact of the AEP surcharge true-up on the customers of the Sebastian AEP Project.

IV. PROPOSED TARIFF VARIANCE FOR SEBASTIAN AEP SURCHARGE

23. To address the concerns explained above, FCG seeks Commission approval of the following modifications to the Sebastian AEP Project surcharge: (a) waive the year seven true-up and retain the current AEP surcharge subject to future true-ups; (b) extend the Amortization Period from ten years to fifteen years subject to earlier termination of the AEP surcharge upon full

payment of the balance to be recovered through the AEP; and (c) retain the year nine true-up per the tariff and add true-ups for years thirteen and fourteen.[2]

24. FCG submits that waiving the year seven true-up and retaining the current AEP surcharge, subject to future true-ups, will mitigate rate shock and provide additional time for usage volumes to increase, as well as for potential new customers and conversions to be served by the Sebastian AEP Project. If these potential mitigating factors do, in fact, come to fruition, the recalculated AEP surcharge should reflect a significantly lower increase at future true-ups. Additionally, this proposed modification will significantly reduce the likelihood that existing customers will switch to alternative fuel sources or relocate their operations to avoid paying the significant increase in the AEP surcharge if the year seven true-up were applied.

25. Although waiving the year seven true-up will minimize rate shock and help avoid customers from leaving from the Sebastian AEP Project, there will still be a significant increase in the AEP surcharge during the year nine true-up based on current usage and remaining project costs. Rather than simply kicking the proverbial "can down the road," FCG submits that it is reasonable and appropriate to also extend the Amortization Period from ten years to fifteen years. Extending the Amortization will provide additional time for usage volumes to increase (including usage by the major commercial customer that was delayed in converting to natural gas and represents approximately 29% of the total forecasted volumes), as well as for potential new customers to be served by the Sebastian AEP Project, which will have the effect of further reducing the recalculated AEP surcharge by spreading the remaining amount to be collected over a slightly longer period of

[2] Under FCG's AEP tariff, the year seven true-up for the Sebastian AEP Project surcharge is scheduled to be applied by the end of 2021. FCG will temporarily postpone applying the year seven true-up pending the Commission's disposition of FCG's requests herein to extend the amortization period and modify the true-ups for the Sebastian AEP Project surcharge.

time and potentially a larger customer base. In the event the amounts collected through the AEP surcharge fully recover the main extension costs above the MACC before the expiration of the revised fifteen-year Amortization Period, the AEP surcharge would be terminated, and any excess amounts collected would be promptly credited or refunded to customers.

26. To better manage customer growth/conversions, varying volumes, and AEP revenues over the course of the revised fifteen-year Amortization Period, FCG proposes to retain the year nine true-up in the AEP tariff and add true-ups for years thirteen and fourteen. FCG submits that these additional true-ups will allow the Company to adjust the surcharge during the remainder of the fifteen-year Amortization Period to better reflect changes in actual customer volumes and revenues associated with the Sebastian AEP Project. FCG believes that these additional true-ups will help provide greater rate stability to the customers served by the Sebastian AEP Project.

27. FCG's proposals to modify the AEP true-up and Amortization Period would apply only to the Sebastian AEP Project. FCG's AEP tariff would continue to be applied to all other AEP projects unless otherwise ordered by the Commission.

28. None of FCG's proposed modifications to the Sebastian AEP Project surcharge will result in a base rate change and, as with all of the AEPs in effect for FCG, any Sebastian AEP Project costs not recovered at the end of the Amortization Period would be the responsibility of the Company.

29. Based on the foregoing, FCG submits that its proposed modifications to the Sebastian AEP Project surcharge are reasonable and appropriate to mitigate the rate shock due to the year seven true-up provided in the AEP tariff, and to take advantage of forecasted usage and future new customers that may take service from the Sebastian AEP Project.

30. FCG has contacted the existing customers served by the Sebastian AEP Project and represents that no customers objected to FCG's requests herein to modify the Sebastian AEP Project surcharges.

WHEREFORE, Florida City Gas respectfully requests that the Commission approve this Petition and authorize the Company to:

(a) Waive the year seven true-up set forth the First Revised Sheet No. 18 of the Florida City Gas tariff and retain the current AEP surcharge for the Sebastian AEP Project, subject to future true-ups;

(b) Extend the Amortization Period set forth the First Revised Sheet No. 18 of the Florida City Gas tariff from ten years to fifteen years for the Sebastian AEP Project, subject to earlier termination of the AEP surcharge upon full payment of the balance to be recovered through the AEP; and

(c) Retain the true-up for year nine per the First Revised Sheet No. 18 of the Florida City Gas tariff and add true-ups for years thirteen and fourteen for the Sebastian AEP Project.

Respectfully submitted this 30th day of July 2021.

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Attachment 1

Florida City Gas Tariff
First Revised Sheet No. 18
Original Sheet No. 19

Rule 14(C) - Area Extension Program

RULES AND REGULATIONS (Continued)

14. EXTENSION OF FACILITIES (Continued)

C. Area Extension Program Charge: Notwithstanding the provisions of Sections A and B when facilities are to be extended to serve single or multiple delivery points in a discrete geographic area, the Company may require an Area Extension Program Charge ("AEP"). The Company, in its sole discretion, may require this charge when:

(1) The cost of the project facilities required to provide service through the area is greater than the aggregate MACC for the Customers to be served; and

(2) The Company reasonably forecasts Margin Revenues plus the AEP during the period ending ten years from when the mains required to serve the project facilities are placed in service (the Amortization Period), that are sufficient to recover the cost of the project facilities.

The AEP, which shall be stated on a per therm basis, shall apply with respect to all gas sold or transported to Company Customers located within the applicable discrete geographic area during the Amortization Period.

The AEP will be calculated by dividing (1) the amount of additional revenue required in excess of the Company's applicable tariff rates by (2) the volume of gas reasonably forecast to be sold or transported to Customers within the applicable discrete geographic area during the Amortization Period. The additional revenue required is that amount determined necessary to recover the excess cost of the facilities, including the Company's allowed cost of capital.

AEP collected shall be used specifically to amortize the cost of the project facilities within the applicable discrete geographic area that are in excess of the MACC. If the AEP collected is sufficient before the expiration of the Amortization Period to fully amortize the excess costs, including provision for the accumulated cost of capital, the AEP for that area shall terminate immediately, and the Company shall promptly credit the affected Customers for amounts over collected, if any.

Upon the earlier of (1) the third anniversary of the date when the project facilities are placed in service and (2) the date on which 80% of the originally forecast annual load is connected, the Company will reassess the amount of additional revenue required to recover the unamortized excess cost of the facilities and the calculation of the AEP. Further reassessments shall be performed by the Company following the fifth, seventh and ninth anniversary of the date when the project facilities were originally placed in service. The resulting adjustment of the AEP (whether upward or downward) will be applied over the remainder of the Amortization Period.

RULES AND REGULATIONS (Continued)

14. EXTENSION OF FACILITIES (Continued)

The Company may enter into a guaranty agreement with the party or parties requesting the extension, whereby that party or parties agree to pay to the Company any unamortized balance remaining at the end of the Amortization Period. The Company's rights under the guaranty agreement will not be considered when calculating the AEP.

The length of the Amortization Period may be modified upon the specific approval of the Florida Public Service Commission.

D. General

The Company will own control and maintain all service pipes, regulators, vents, meters, meter connections, valves and other appurtenances from the main to the outlet side of the meter.

The extension of facilities provisions shall not require the Company to extend its mains across private property or in streets that are not at established grade; nor prohibit the Company from making extensions of mains of greater length than required herein.

Attachment 2

Comparison of the Originally Forecasted and Actual Customers and Volumes for the Sebastian AEP Project

Comparison of the Originally Forecasted and Actual
Customers and Volumes for the Sebastian AEP Project*

	Comparisons					
Year	Customers			Therms		
	Forecasted	Actuals	Variance	Forecasted	Actuals	Variance
2014						
2015	15	16	1	86,055	104,314	18,259
2016	59	*39*	(20)	611,058	247,301	(363,757)
2017	65	*43*	(22)	663,327	269,790	(393,537)
2018	68	*47*	(21)	692,436	286,206	(406,230)
2019	70	47	(23)	711,842	294,851	(416,991)
2020	72	48	(24)	731,248	288,744	(442,504)
2021	74	48	(26)	750,654	164,104	(586,550)

*As of May 31, 2021.

Attachment 3

Summary of the Revenues, Carrying Costs, and Ending Recoverable Balance for the Sebastian AEP Project as of May 31, 2021

Summary of the Revenues, Carrying Costs, and Ending Recoverable Balance for the Sebastian AEP Project as of May 31, 2021

	Acct 134-246-0303 Beginning Recoverable	Acct 134-246-0303 AEP Investment	Dr 424-011, Cr 134-246 AEP Monthly Revenue Collections less Assessment (4)	Ending Recoverable	Average Monthly Recoverable	Investment for Computing Carrying Charges	Dr Acct 134-246 Cr Acct 412-250 Carrying Charge (3)	Account 2801000 Regulatory Asset Ending Recoverable Balance
Dec-14	$ -	$ 791,341.78	$ -	$ 791,341.78	$ 395,670.89	$ 395,670.89	$ 3,248.35	$ 794,590.13
Jan-15	$ 794,590.13	$ 5,514.12	$ 114.49	$ 799,989.76	$ 797,289.95	$ 797,289.95	$ 6,545.54	$ 806,535.30
Feb-15	$ 806,535.30	$ 46.38	$ 303.74	$ 806,277.94	$ 806,406.62	$ 806,406.62	$ 6,620.38	$ 812,898.32
Mar-15	$ 812,898.32	$ 192,718.79	$ 1,630.97	$ 1,003,986.14	$ 908,442.23	$ 908,442.23	$ 7,458.07	$ 1,011,444.21
Apr-15	$ 1,011,444.21	$ 19,680.66	$ 3,337.29	$ 1,027,787.58	$ 1,019,615.90	$ 1,019,615.90	$ 8,370.77	$ 1,036,158.36
May-15	$ 1,036,158.36	$ 23,192.28	$ 4,418.16	$ 1,054,932.48	$ 1,045,545.42	$ 1,045,545.42	$ 8,583.65	$ 1,063,516.13
Jun-15	$ 1,063,516.13	$ 18,336.85	$ 4,189.59	$ 1,077,663.39	$ 1,070,589.76	$ 1,070,589.76	$ 8,789.26	$ 1,086,452.64
Jul-15	$ 1,086,452.64	$ 17,083.75	$ 5,982.81	$ 1,097,553.58	$ 1,092,003.11	$ 1,092,003.11	$ 8,965.05	$ 1,106,518.64
Aug-15	$ 1,106,518.64	$ 9,034.94	$ 5,614.58	$ 1,109,939.00	$ 1,108,228.82	$ 1,108,228.82	$ 9,098.26	$ 1,119,037.26
Sep-15	$ 1,119,037.26	$ 12,251.94	$ 7,145.57	$ 1,124,143.63	$ 1,121,590.45	$ 1,121,590.45	$ 9,207.96	$ 1,133,351.59
Oct-15	$ 1,133,351.59	$ 2,021.83	$ 7,956.71	$ 1,127,416.71	$ 1,130,384.15	$ 1,130,384.15	$ 9,280.15	$ 1,136,696.86
Nov-15	$ 1,136,696.86	$ 5,084.62	$ 7,686.78	$ 1,134,094.70	$ 1,135,395.78	$ 1,135,395.78	$ 9,321.30	$ 1,143,416.00
Dec-15	$ 1,143,416.00	$ 583.71	$ 9,278.35	$ 1,134,721.36	$ 1,139,068.68	$ 1,139,068.68	$ 9,351.45	$ 1,144,072.81
Jan-16	$ 1,144,072.81	$ 2,815.09	$ 8,871.60	$ 1,138,016.30	$ 1,141,044.56	$ 1,141,044.56	$ 9,367.67	$ 1,147,383.97
Feb-16	$ 1,147,383.97	$ 2,748.27	$ 10,648.91	$ 1,139,483.33	$ 1,143,433.65	$ 1,143,433.65	$ 9,387.29	$ 1,148,870.62
Mar-16	$ 1,148,870.62	$ 15,494.42	$ 11,518.03	$ 1,152,847.01	$ 1,150,858.81	$ 1,150,858.81	$ 9,448.24	$ 1,162,295.25
Apr-16	$ 1,162,295.25	$ 88,756.93	$ 9,720.98	$ 1,241,331.20	$ 1,201,813.23	$ 1,201,813.23	$ 9,866.57	$ 1,251,197.77
May-16	$ 1,251,197.77	$ -	$ 10,371.59	$ 1,240,826.18	$ 1,246,011.97	$ 1,246,011.97	$ 10,229.43	$ 1,251,055.61
Jun-16	$ 1,251,055.61	$ -	$ 9,582.09	$ 1,241,473.52	$ 1,246,264.56	$ 1,246,264.56	$ 10,231.50	$ 1,251,705.02
Jul-16	$ 1,251,705.02	$ -	$ 9,384.41	$ 1,242,320.61	$ 1,247,012.81	$ 1,247,012.81	$ 10,237.64	$ 1,252,558.25
Aug-16	$ 1,252,558.25	$ -	$ 9,188.72	$ 1,243,369.53	$ 1,247,963.89	$ 1,247,963.89	$ 10,245.45	$ 1,253,614.98
Sep-16	$ 1,253,614.98	$ -	$ 8,215.13	$ 1,245,399.85	$ 1,249,507.41	$ 1,249,507.41	$ 10,258.12	$ 1,255,657.97
Oct-16	$ 1,255,657.97	$ -	$ 8,307.82	$ 1,247,350.15	$ 1,251,504.06	$ 1,251,504.06	$ 10,274.51	$ 1,257,624.67
Nov-16	$ 1,257,624.67	$ -	$ 9,610.45	$ 1,248,014.22	$ 1,252,819.44	$ 1,252,819.44	$ 10,285.31	$ 1,258,299.53
Dec-16	$ 1,258,299.53	$ -	$ 10,537.32	$ 1,247,762.21	$ 1,253,030.87	$ 1,253,030.87	$ 10,287.05	$ 1,258,049.26
Jan-17	$ 1,258,049.26	$ -	$ 10,655.32	$ 1,247,393.94	$ 1,252,721.60	$ 1,252,721.60	$ 10,284.51	$ 1,257,678.45
Feb-17	$ 1,257,678.45	$ -	$ 11,808.71	$ 1,245,869.74	$ 1,251,774.10	$ 1,251,774.10	$ 10,276.73	$ 1,256,146.47
Mar-17	$ 1,256,146.47	$ 4,564.73	$ 10,832.93	$ 1,249,878.27	$ 1,253,012.37	$ 1,253,012.37	$ 10,286.90	$ 1,260,165.17
Apr-17	$ 1,260,165.17	$ 285.31	$ 11,636.15	$ 1,248,814.33	$ 1,254,489.75	$ 1,254,489.75	$ 10,299.03	$ 1,259,113.36
May-17	$ 1,259,113.36	$ -	$ 11,021.40	$ 1,248,091.96	$ 1,253,602.66	$ 1,253,602.66	$ 10,291.74	$ 1,258,383.70
Jun-17	$ 1,258,383.70	$ 4,824.50	$ 10,264.76	$ 1,252,943.44	$ 1,255,663.57	$ 1,255,663.57	$ 10,308.66	$ 1,263,252.10
Jul-17	$ 1,263,252.10	$ -	$ 10,079.31	$ 1,253,172.79	$ 1,258,212.45	$ 1,258,212.45	$ 10,329.59	$ 1,263,502.38
Aug-17	$ 1,263,502.38	$ -	$ 9,983.45	$ 1,253,518.93	$ 1,258,510.66	$ 1,258,510.66	$ 10,332.04	$ 1,263,850.97
Sep-17	$ 1,263,850.97	$ -	$ 8,887.14	$ 1,254,963.83	$ 1,259,407.40	$ 1,259,407.40	$ 10,339.40	$ 1,265,303.23
Oct-17	$ 1,265,303.23	$ -	$ 8,687.89	$ 1,256,615.34	$ 1,260,959.29	$ 1,260,959.29	$ 10,352.14	$ 1,266,967.48
Nov-17	$ 1,266,967.48	$ -	$ 10,734.24	$ 1,256,233.24	$ 1,261,600.36	$ 1,261,600.36	$ 10,357.40	$ 1,266,590.64
Dec-17	$ 1,266,590.64	$ -	$ 11,172.87	$ 1,255,417.77	$ 1,261,004.21	$ 1,261,004.21	$ 10,352.51	$ 1,265,770.28
Jan-18	$ 1,265,770.28	$ -	$ 12,241.15	$ 1,253,529.13	$ 1,259,649.71	$ 1,259,649.71	$ 9,195.81	$ 1,262,724.94
Feb-18	$ 1,262,724.94	$ -	$ 13,356.75	$ 1,249,368.19	$ 1,256,046.57	$ 1,256,046.57	$ 9,169.51	$ 1,258,537.70
Mar-18	$ 1,258,537.70	$ -	$ 12,254.71	$ 1,246,282.99	$ 1,252,410.34	$ 1,252,410.34	$ 9,142.96	$ 1,255,425.95
Apr-18	$ 1,255,425.95	$ -	$ 12,347.43	$ 1,243,078.52	$ 1,249,252.23	$ 1,249,252.23	$ 9,119.90	$ 1,252,198.42
May-18	$ 1,252,198.42	$ -	$ 11,526.64	$ 1,240,671.78	$ 1,246,435.10	$ 1,246,435.10	$ 9,099.34	$ 1,249,771.12
Jun-18	$ 1,249,771.12	$ -	$ 10,658.75	$ 1,239,112.38	$ 1,244,441.75	$ 1,244,441.75	$ 7,339.20	$ 1,246,451.58
Jul-18	$ 1,246,451.58	$ -	$ 10,704.69	$ 1,235,746.89	$ 1,241,099.23	$ 1,241,099.23	$ 7,319.49	$ 1,243,066.38
Aug-18	$ 1,243,066.38	$ -	$ 7,501.82	$ 1,235,564.56	$ 1,239,315.47	$ 1,239,315.47	$ 7,308.97	$ 1,242,873.53
Sep-18	$ 1,242,873.53	$ -	$ 9,964.37	$ 1,232,909.16	$ 1,237,891.34	$ 1,237,891.34	$ 7,300.57	$ 1,240,209.72
Oct-18	$ 1,240,209.72	$ -	$ 10,574.10	$ 1,229,635.62	$ 1,234,922.67	$ 1,234,922.67	$ 7,283.06	$ 1,236,918.69
Nov-18	$ 1,236,918.69	$ -	$ 10,438.85	$ 1,226,479.84	$ 1,231,699.26	$ 1,231,699.26	$ 7,264.05	$ 1,233,743.89
Dec-18	$ 1,233,743.89	$ -	$ 11,482.36	$ 1,222,261.53	$ 1,228,002.71	$ 1,228,002.71	$ 7,242.25	$ 1,229,503.78
Jan-19	$ 1,229,503.78	$ -	$ 13,845.82	$ 1,215,657.96	$ 1,222,580.87	$ 1,222,580.87	$ 7,151.32	$ 1,222,809.28
Feb-19	$ 1,222,809.28	$ -	$ 13,034.47	$ 1,209,774.81	$ 1,216,292.04	$ 1,216,292.04	$ 6,411.15	$ 1,216,185.96
Mar-19	$ 1,216,185.96	$ -	$ 12,409.04	$ 1,203,776.92	$ 1,209,981.44	$ 1,209,981.44	$ 6,377.89	$ 1,210,154.81
Apr-19	$ 1,210,154.81	$ -	$ 12,105.17	$ 1,198,049.64	$ 1,204,102.23	$ 1,204,102.23	$ 6,346.90	$ 1,204,396.54
May-19	$ 1,204,396.54	$ -	$ 11,952.71	$ 1,192,443.83	$ 1,198,420.19	$ 1,198,420.19	$ 6,316.95	$ 1,198,760.78
Jun-19	$ 1,198,760.78	$ -	$ 10,245.05	$ 1,188,515.73	$ 1,193,638.26	$ 1,193,638.26	$ 6,291.74	$ 1,194,807.48
Jul-19	$ 1,194,807.48	$ -	$ 10,491.17	$ 1,184,316.31	$ 1,189,561.89	$ 1,189,561.89	$ 6,270.26	$ 1,190,586.57
Aug-19	$ 1,190,586.57	$ -	$ 10,760.89	$ 1,179,825.68	$ 1,185,206.12	$ 1,185,206.12	$ 6,247.30	$ 1,186,072.97
Sep-19	$ 1,186,072.97	$ -	$ 9,390.32	$ 1,176,682.65	$ 1,181,377.81	$ 1,181,377.81	$ 6,227.12	$ 1,182,909.77
Oct-19	$ 1,182,909.77	$ 12,352.98	$ 10,739.07	$ 1,184,523.68	$ 1,183,716.73	$ 1,183,716.73	$ 6,239.45	$ 1,190,763.13
Nov-19	$ 1,190,763.13	$ (1,141.58)	$ 10,295.86	$ 1,179,325.69	$ 1,185,044.41	$ 1,185,044.41	$ 6,246.45	$ 1,185,572.14
Dec-19	$ 1,185,572.14	$ -	$ 12,097.27	$ 1,173,474.87	$ 1,179,523.50	$ 1,179,523.50	$ 6,217.35	$ 1,179,692.21
Jan-20	$ 1,179,692.21	$ -	$ 13,584.37	$ 1,166,107.84	$ 1,172,900.03	$ 1,172,900.03	$ 7,026.24	$ 1,173,134.08
Feb-20	$ 1,173,134.08	$ -	$ 13,455.27	$ 1,159,678.81	$ 1,166,406.45	$ 1,166,406.45	$ 6,987.34	$ 1,166,666.15
Mar-20	$ 1,166,666.15	$ -	$ 14,548.91	$ 1,152,117.24	$ 1,159,391.70	$ 1,159,391.70	$ 6,945.32	$ 1,159,062.56
Apr-20	$ 1,159,062.56	$ -	$ 7,520.37	$ 1,151,542.19	$ 1,155,302.38	$ 1,155,302.38	$ 6,920.82	$ 1,158,463.01
May-20	$ 1,158,463.01	$ -	$ 8,249.45	$ 1,150,213.56	$ 1,154,338.29	$ 1,154,338.29	$ 6,915.05	$ 1,157,128.61
Jun-20	$ 1,157,128.61	$ -	$ 10,008.09	$ 1,147,120.52	$ 1,152,124.56	$ 1,152,124.56	$ 6,901.78	$ 1,154,022.30
Jul-20	$ 1,154,022.30	$ -	$ 10,978.20	$ 1,143,044.10	$ 1,148,533.20	$ 1,148,533.20	$ 6,880.27	$ 1,149,924.37
Aug-20	$ 1,149,924.37	$ -	$ 9,918.10	$ 1,140,006.27	$ 1,144,965.32	$ 1,144,965.32	$ 6,858.90	$ 1,146,865.17
Sep-20	$ 1,146,865.17	$ -	$ 11,309.19	$ 1,135,555.98	$ 1,141,210.58	$ 1,141,210.58	$ 6,836.40	$ 1,142,392.39
Oct-20	$ 1,142,392.39	$ (3,274.28)	$ 11,509.66	$ 1,127,608.45	$ 1,135,000.42	$ 1,135,000.42	$ 6,799.20	$ 1,134,407.65
Nov-20	$ 1,134,407.65	$ -	$ 10,740.82	$ 1,123,666.83	$ 1,129,037.24	$ 1,129,037.24	$ 6,763.48	$ 1,130,430.31
Dec-20	$ 1,130,430.31	$ -	$ 8,629.04	$ 1,121,801.27	$ 1,126,115.79	$ 1,126,115.79	$ 6,745.98	$ 1,128,547.25
Jan-21	$ 1,128,547.25	$ -	$ 12,466.45	$ 1,116,080.80	$ 1,122,314.02	$ 1,122,314.02	$ 6,723.21	$ 1,122,804.00
Feb-21	$ 1,122,804.00	$ -	$ 13,652.77	$ 1,109,151.23	$ 1,115,977.62	$ 1,115,977.62	$ 6,764.02	$ 1,115,915.25
Mar-21	$ 1,115,915.25	$ -	$ 13,559.10	$ 1,102,356.15	$ 1,109,135.70	$ 1,109,135.70	$ 6,722.55	$ 1,109,078.70
Apr-21	$ 1,109,078.70	$ -	$ 14,504.43	$ 1,094,574.27	$ 1,101,826.49	$ 1,101,826.49	$ 6,678.25	$ 1,101,252.52
May-21	$ 1,101,252.52	$ -	$ 13,299.43	$ 1,087,953.09	$ 1,094,602.81	$ 1,094,602.81	$ 6,634.46	$ 1,094,587.56