BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power Corporation's Earnings, Including Effects of Proposed Acquisition of Florida Power Corporation by Carolina Power & Light DOCKET NO. 000824-EI

Submitted for Filing: February 11, 2002

REBUTTAL TESTIMONY OF JOHN B CRISP

ON BEHALF OF FLORIDA POWER CORPORATION

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REBUTTAL TESTIMONY OF JOHN B. CRISP ON BEHALF OF FLORIDA POWER CORPORATION

1	I.	Introduction and Background
2	Q.	Please state your name.
3	А.	John B. Crisp.
4		
5	Q.	Did you submit Direct Testimony in this case on November 15, 2001?
6	А.	Yes, I submitted testimony describing the development and results of FPC's
7		load forecast used in the preparation of this rate case.
8		
9	Q.	Have you reviewed the pre-filed testimony filed by witnesses sponsored
10		by the Intervenors, the Office of Public Counsel ("OPC"), and Staff?
11	А.	Yes, I have.
12		
13	II.	Purpose
14	Q.	What is the purpose of the testimony that you are filing at this time?
15	А.	I am submitting this testimony primarily to rebut the testimony of OPC
16		witness, David E. Dismukes. I will also rebut Mr. Gorman's brief
17		comments about "normalizing" the sales forecast for rate making purposes.
18		
19	Q.	Please summarize your testimony.
20	А.	Florida Power's September 2001 load forecast is appropriate and reliable,
21		and should be utilized for purposes of setting rates in this proceeding.

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1	Florida Power's excellent track record for accurately forecasting electric
2	sales is unchallenged by any party in this proceeding. Indeed, based on
3	actual information available through December 31, 2001, it appears that
4	both Florida Power's June 2001 forecast and its September 2001 forecast
5	were overly optimistic and actual sales are lower than forecasted.
6	
7	Nonetheless, both Dr. Dismukes and Mr. Gorman suggest that the
8	Commission should use some variation of the Company's June 2001
9	forecast instead of the September 2001 forecast. Specifically, Dr. Dismukes
10	claims that the Commission-established test year is inappropriate, but that
11	using his methodology with Florida Power's June 2001 economic drivers is
12	sufficient. Dr. Gorman asserts that the test year should be normalized or
13	levelized, but admits he did not prepare a new forecast and so suggests that
14	the Company's June 2001 forecast will have to do.
15	
16	These recommendations are flawed, because, at bottom, what Dr.
17	Dismukes and Mr. Gorman are necessarily asking the Commission to do is
18	set rates at a level that will cause Florida Power to under recover during the
19	test year for the sake of pursuing the illusive goal of "greater" accuracy in
20	the more distant future. This runs contrary to established rate making
21	principles and wholly ignores that the range of earnings mechanism already
22	inherent to the rate-making process compensates for economic variances
23	beyond the test year. Moreover, these recommendations ignore the fact that

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1	effect of the economic down-turn reflected in the September 2001 forecast
2	is permanent and it is factually incorrect to assume that the economy will
3	rebound to levels previously predicted in the same time frame as contained
4	in Florida Power's June forecast. This makes no sense. The Commission
5	can keep a watch on the future through surveillance reporting, but this rate
6	case is the best, most direct vehicle for getting rates right for the test year.
7	
8	On a different point, Dr. Dismukes spends a great deal of time
9	discussing his inability to recreate Florida Power's forecasts. This is quite
10	simply based on his failure to apply an explained adjustment to Florida
11	Power's customer count during the April through November time frame to
12	adjust for the impact of Florida Power's seasonal service rate. As explained
13	in more detail below, if Dr. Dismukes had made this appropriate and
14	necessary adjustment he would have been able to perfectly replicate Florida
15	Power's forecast.
16	
17	Finally, the Commission should reject Dr. Dismukes' reforecast of
18	both Florida Power's June 2001 forecast and September 2001 forecast for a
19	number of reasons. First, Dr. Dismukes fails to explain why his
20	methodology is more appropriate. Absent this, there is no reason for the
21	Commission to adopt his reforecast as opposed to Florida Power's time-
22	tested methodology. Second, Dr. Dismukes' reforecast does not account for
23	the impact of the seasonal service rate and thus contains the same flaw as his

1		attempted replication of Florida Power's forecast. Third, and most
2		ironically, Dr. Dismukes' reforecast of either FPC's June or September 2001
3		forecast – properly adjusted for the impact of the seasonal service rate –
4		actually would have resulted in a lower sales forecast than Florida Power's
5		methodology did.
. 6		
7		For all these reasons as explained more fully in my testimony below,
8		the Commission should adopt Florida Power's September 2001 forecast for
9		purposes of setting Florida Power's rates in this proceeding.
10		
11	Q.	Have you prepared any exhibits to your testimony?
12	А.	Yes. Attached to my rebuttal testimony are three exhibits identified below:
13		JBC-8 June 2001 forecast compared to actuals through December 2001JBC-9 September 2001 forecast compared to actuals through December 2001.
		JBC-10 DED-1 Adjusted for Seasonal Service Rate Customers
. 1		
13	III.	Florida Power's Forecasts
14	Q.	Have any of the witnesses in this case questioned the historical accuracy
15		of Florida Power's load forecasts?
16	А.	No, they have not. The historical accuracy of current and past forecasts, as
17		presented in my direct testimony, has not been questioned by any witness in

1		this case. Dr. Dismukes presents no concerns or remarks about Florida
2		Power's forecast accuracy. He even admits at p. 6 to using an approach very
3		similar to Florida Power's when presenting his own forecast of residential
4		and commercial class average use projections. And although Mr. Gorman
5		argues that Florida Power's September 2001 forecast should not be utilized
6		in this proceeding, he grudgingly admits at p. 15 that "it may be reasonable
7		for 2002."
8		
9	Q.	How have Florida Power's June 2001 and September 2001 forecasts
10		faired against actual data through December 2001?
11	A.	Now that historical data is available, it appears that Florida Power may have
12		been overly optimistic in both its June 2001 and September 2001 forecasts.
13		Exhibit JBC-8 shows two variance tables comparing reported and projected
14		sales and customers, respectively, for the months of June 2001 through
15		December 2001. What we find is negative variances between actual and
16		weather-normalized sales and customers when compared to forecast. FPC
17		total system sales were actually 2.60 percent lower than estimated in the
18		June forecast for the June to December period while system customer levels
19		were actually 0.15 percent lower than forecasted. The variances become
20		wider when our focus is narrowed to the October to December 2001 time
21		period, reflecting a steeper economic slowdown since the September attack.
22		

1		Likewise, Florida Power's September forecast reflects a negative
2		variance between actual and weather-normalized sales and customers.
3		FPC's total system sales for the October to December time frame were
4		actually 2.44 percent lower than the sales projected by the September
5		forecast, while the customer levels were below the expected level by 1.05
6		percent.
7		
8	Q.	Given the Company's September 2001 forecast's performance to date,
9		should the Commission still rely on it for purposes of setting rates in
10		this proceeding.
11	A.	Yes. Although the economy is faring somewhat worse than Florida Power
12		forecasted, the Commission should still adopt Florida Power's September
13		forecast for use in this proceeding. The variances I have described are
14		within a reasonable range and closely align with the type of reasonable
15		variances that can be seen on Exhibit JBC-4 of my direct testimony. Once
16		again, this simply goes to show that Florida Power's forecasting
17		methodology is highly reliable. Thus, the Commission should not hesitate to
18		adopt it for ratemaking purposes.
19		
20	IV.	Dr. Dismukes' Attempt to Replicate Florida Power's Forecast
21	Q.	Dr. Dismukes spends much of his direct testimony explaining his
22		unsuccessful attempt to replicate the Company's June 2001 and
23		September 2001 forecast. Can you explain why Dr. Dismukes was

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1		unable to replicate Florida Power's forecasts.
2	А.	Certainly. Simply put, Dr. Dismukes skipped an important step that we took
3		in preparing our forecast to adjust our customer forecast in the May to
4		November time frame to minimize the otherwise distorting impact of our
5		Seasonal Service Rate on the customer count for these months. Looking at
6		column 11 of Dr. Dismukes' Exhibit, DED-1, one will immediately note
7		that Dr. Dismukes was able to replicate Florida Power's forecast perfectly
8		for the months of January, February, March, April, and December. It is only
9		in the remaining months that Dr. Dismukes' replication fails to match
10		Florida Power's perfectly. This is because, as noted above, Florida Power
11		makes an adjustment to the forecasted number of residential customers to
12		account for the impact of Florida Power's Seasonal Service Rate tariff
13		introduced in 1998.
14		
15		As mentioned in my direct testimony, the residential seasonal service
16		rate allows a residential customer to remain "active" on the Company's
17		records rather than disconnect service for the summer season. By remaining
18		active and allowing the Company to forego the disconnect/reconnect service
19		expense, the customer receives a \$5.00 customer charge reduction off their
20		monthly bill for up to 3 months. It has proven to be a great convenience to
21		our customers as nearly 40,000 have signed on to the rate. To eliminate
22		"free-riders" transferring onto this rate, customers are limited to using an
23		average of only 7 kWh per day – about enough for a security light during

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those months in which they receive the credit.

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3 As a result of the implementation of this rate, however, Florida 4 Power's historic seasonal fluctuation in residential customers (resulting from the coming and going of "snowbirds") was no longer reflected in the 5 6 customer count, which is based on the number of customers receiving bills. 7 Thus, Florida Power determined that an adjustment to the customer forecast needed to be applied to differentiate these "seasonal" customers from the 8 9 "non-seasonal" customers. This was accomplished by very conservatively 10 estimating that 25 percent of the customers on the seasonal service rate 11 would varyingly be at their out-of-state residences during the May to 12 November time-frame. For the June and September forecasts, this amounted to approximately 10,000 customers. Thus, Florida Power's residential 13 14 customer forecast was reduced by this figure in the months of May to November 2002 before multiplying the projected monthly kWh use per 15 customer. The more than 93,000 MWh total difference that can be seen in 16 17 Exhibit JBC-10, column 15, as a result of this adjustment amounts to the 18 exact difference noted in DED-1 column 11 for these months. See Exhibit 19 JBC-10. 20 21 Florida Power described this adjustment to Dr. Dismukes, the Staff,

23 December referenced by Dr. Dismukes in his direct testimony. As reflected

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and other attendees at the informal meeting held in St. Petersburg in early

1		on page 4 of Dr. Dismukes' testimony, Florida Power's explanation of this
2		adjustment resulted in a collaborative production request identified by Dr.
3		Dismukes as "Staff POD 42: Historic and Forecasted customers in seasonal
4		rate schedule." Dr. Dismukes simply failed to make this adjustment.
5		
6		In any event, the important thing for the Commission to understand
7		is that had Dr. Dismukes not skipped this step he would have been able to
8		replicate Florida Power's forecast perfectly.
9		
10	v.	Dr. Dismukes Re-forecast of Residential and Commercial Sales
11	Q.	Although Dr. Dismukes does not comment on the historical accuracy of
12		Florida Power's forecast or openly criticize Florida Power's
13		methodology, he did prepare a re-forecast of residential and
14		commercial energy sales for Florida Power's June 2001 and September
15		2001 forecast. Should the Commission rely on Dr. Dismukes' re-
16		forecast of residential and commercial sales for either the June 2001 or
17		September 2001 forecast?
18	А.	No it should not, for several reasons. First, as I explained above, Florida
19		Power's own June 2001 and September 2001 forecasts when compared to
20		actual data appear to have over-forecasted sales. If the Commission were to
21		adopt Dr. Dismukes re-forecast as it appears in DED-3, it would be choosing
22		a forecast with a greater likelihood of over-predicting sales than Florida
23		Power's.

1		Second, Dr. Dismukes' re-forecast fails to make a downward
2		adjustment to the number of customers based on the seasonal service rate for
3		the months of May through November as described above. Although Dr.
4		Dismukes relied on Florida Power's initial customer count numbers in his
5		re-forecast, he failed to make the seasonal service rate adjustment, which as I
6		explained above is necessary to correct for a customer overcount that
7		otherwise occurs. Notably, if Dr. Dismukes had made this appropriate
8		adjustment and then used his re-forecasting methodology, his re-forecast
9		would have actually resulted in a lower June and September sales forecast
10		for 2002 than did Florida Power's methodology.
11		
12		Third, Dr. Dismukes does not offer any basis regarding why his
13		methodology is more appropriate or why it has greater predictive power than
14		Florida Power's forecast methodology. Given the historical accuracy of
15		Florida Power's methodology, there is no reason for the Commission to
16		impose on Florida Power an alternative methodology when the Commission
17		has no ability to evaluate its historical accuracy.
18		
19	VI.	<u>Test Year Forecast</u>
20	Q.	Both Dr. Dismukes and Mr. Gorman propose that the Commission use
21		some variation of Florida Power's June 2001 forecast instead of its
22		September 2001 for purposes of setting rates in this proceeding. Do you
23		agree that the Commission should use the June forecast instead of the

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1		September forecast? If not, why not?
2	А.	No, I do not agree that the Commission should prefer our June forecast. The
3		June 2001 forecast no longer provides an accurate picture of the future,
4		whether the future being discussed is the 2002 test year or beyond. The
5		impact of the September 2001 forecasted recession is permanent. An
6		example of this is highlighted in my Exhibit JBC-6 (Sheets 1-4) included
7		with my direct testimony. There is a permanently "foregone" level of
8		economic activity that never returns when growth rates change for an interim
9		period. This is pointed out in the column titled "SEP '01 vs. JUN '01"
10		below each graph. Even though in 2003, economic growth rates in the
11		September 2001 forecast came back up to the original growth rates assumed
12		in the June 2001 forecast, the level of economic activity never catches up. It
13		is factually wrong to assume it will.
14		
15	Q.	Mr. Gorman claims that the Commission should require Florida Power
16		to use "normalized" economic drivers to produce a levelized sales
17		forecast for purposes of setting rates in this proceeding. Do you agree?
18	А.	No. "Normalizing" or "levelizing" economic drivers to levelize electric
19		sales is not a traditional part of economic forecasting, by electric utilities and
20		is unprecedented in a Florida rate case, as far as I can determine. Indeed, I
21		can only speculate as to the various ways one might attempt to create such a
22		forecast, and even then the Commission could not assure itself that such a
23		forecast would actually be predictive of the economy over any particular

1		range of years. Even Mr. Gorman does not undertake to prepare a levelized
2		forecast. Neither does Dr. Dismukes, for that matter, even though he agrees
3		with Dr. Gorman that the September forecast should not be utilized.
4		
5		Equally important, the whole point of a so-called "normalized"
6		forecast is to improve predictability for the post-test year period, at the cost
7		of accuracy for the test year. This virtually assures that Florida Power would
8		under recover for the test year for the sake of pursuing the illusive goal of
9		"greater" accuracy in the more distant future. This makes no sense and is
10		contrary to well-established rate-making principles. The Commission can
11		keep a watch on the future through surveillance reporting, but this rate case
12		is the best, most direct vehicle for getting rates right for the test year.
13		
14	Q.	Given the additional economic slow-down predicted by the September
15		2001 forecast should the Commission still be comfortable with using
16		2002 as the test year?
17	A.	Yes it should. Please allow me to explain. The Commission has
18		effectively utilized a test year methodology to set rates in Florida for some
19		time. In this case, the Commission even selected the test year. Deviating
20		from this traditional approach by adopting an alternative forecast (as
21		suggested by Dr. Dismukes and Dr. Gorman) will create a poor precedent
		and is ultimately unnecessary because the Commission's rate-making
22		and is uninately unnecessary because the Commission's rate-making

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1	in the test year forecast – an earnings range. Given this, the Commission
2	should not feel obliged to deviate from its tried and true method for setting
3	rates. In the end, neither Dr. Dismukes nor Mr. Gorman can claim that
4	Florida Power's September 2001 forecast will not accurately anticipate
5	2002. Moreover, it goes without saying that this question would not be an
6	issue if the tables were turned and the Company was claiming that the
7	Commission-selected test year was a boom year and thus sales had to be
8	adjusted downward or "normalized" downward.
9	
10	Given all these considerations, the Commission should adopt
11	Florida Power's September 2001 sales forecast and permit the earnings
12	ange mechanism to compensate for economic variance as it is clearly
13	designed to do.
14	
15	Q. Does this conclude your rebuttal testimony?
16	A. Yes, it does.

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FPC Actual versus June 2001 Forecast Variance Analysis June through December 2001

YEAR	84	Actual	Weather Norm'l	June '01 Forecast	% Chg From Act	% Chg From WN
	M	Actual	NOTITI	FUIECast	FION ACL	FION VIN
2001						
2001	2					
2001	3					
2001	4					
2001	5					
2001	6	3,580,950	3,646,134	3,618,184	-1.03%	0.77%
2001	7	3,669,239	3,794,638	3,955,981	-7.25%	-4.08%
2001	8	3,705,606	3,880,034	4,012,860	-7.66%	-3.31%
2001	9	4,043,995	4,108,910	4,191,369	-3.52%	-1.97%
2001	10	3,195,171	3,437,863	3,649,819	-12.46%	-5.81%
2001	1 1	3,014,045	3,085,525	3,160,263	-4.63%	-2.36%
2001	12	2,834,013	2,967,993	2,997,895	-5.47%	-1.00%
Fcst-to-Date Oct. to Dec.		24,043,019 9,043,229	24,921,097 9,491,381	25,586,371 9,807,977	-6.03% -7.80%	-2.60% -3.23%

Total FPC System MWh Energy Sales

FPC Actual versus June 2001 Forecast Variance Analysis June through December 2001

Total FPC Retail Customers

YEAR	M	Actual*	June '01 Forecast	Diff	% Chg From Act
2001	1	Actual	1010000	<u>U/III</u>	<u>i tom Aot</u>
2001	2				
2001	3				
2001	4				
2001	5				
2001	6	1,437,856	1,432,490	5,366	0.37%
2001	7	1,443,299	1,433,161	10,138	0.71%
2001	8	1,445,983	1,434,971	11,012	0.77%
2001	9	1,441,201	1,437,398	3,803	0.26%
2001	10	1,434,588	1,442,217	-7,629	-0.53%
2001	11	1,435,305	1,451,656	-16,351	-1.13%
2001	12	1,437,798	1,459,622	-21,824	-1.50%
Fcst-to-Date		1,439,433	1,441,645	-2,212	-0.15%
Oct. to Dec.		1,435,897	1,451,165	-15,268	-1.05%

* Actual customer count has been adjusted for event-driven billing. This "normalizes" the customer count to a basis of every customer receiving one bill per month.

FPC Actual versus Sep't 2001 Forecast Variance Analysis October through December 2001

Total FPC System MWh Energy Sales

			Weather	Sep't '01	% Chg	% Chg
YEAR	M	<u>Actual</u>	<u>Norm'l</u>	<u>Forecast</u>	<u>From Act</u>	From WN
2001	1					
2001	2					
2001	3					
2001	4					
2001	5					
2001	6					
2001	7					
2001	8					
2001	9					
2001	10	3,195,171	3,437,863	3,627,704	-11.92%	-5.23%
2001	11	3,014,045	3,085,525	3,133,282	-3.81%	-1.52%
2001	12	2,834,013	2,967,993	2,967,621	-4.50%	0.01%
Oct. to Dec	•	9,043,229	9,491,381	9,728,607	-7.04%	-2.44%

FPC Actual versus Sep't 2001 Forecast Variance Analysis October through December 2001

Total FPC Retail Customers

YEAR	М	Actual*	Sep't '01 Forecast	Diff	% Chg From Act
	M	Actual	FUIECast	<u>Diff</u>	FION ACL
2001	1				
2001	2				
2001	3				
2001	4				
2001	5				
2001	6				
2001	7				
2001	8				
2001	9				
2001	10	1,434,588	1,442,217	-7,629	-0.53%
2001	11	1,435,305	1,451,656	-16,351	-1.13%
2001	12	1,437,798	1,459,622	-21,824	-1.50%
Oct. to De	с.	4,307,691	4,353,495	-45,804	-1.05%

* Actual customer count has been adjusted for event-driven billing. This "normalizes" the customer count to a basis of every customer receiving one bill per month.

Response to Direct Testimony of David E. Dismukes Exhibit DED-1

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	FPC W/O Sebring Residential Class				Sebring	Only Residen	tial Class								
					.		SSR Adjusted				Combined MWh	RESID	MWH After S	SSR Summer	Final Resid
Year	M	RUPC	Res Custs	MWh	SSR Custs	SSR	MWh	<u>RUPC</u>	Res Custs	<u>MWh</u>	Before SSR Adjmt	DSM Savings	DSM Savings	/Wh Impact	MWh Fcst
2002	1	1,204	1,285,599	1,547,963	40,341			945	11,406	10,776	1,558,739	45,907	1,512,832		1,512,832
2002	2	1,138	1,290,154	1,468,122	40,484			891	11,500	10,242	1,478,364	36,247	1,442,117		1,442,117
2002	3	1,004	1,291,810	1,296,731	40,536			764	11,523	8,802	1,305,533	28,940	1,276,593		1,276,593
2002	4	960	1,286,599	1,235,277	40,373			680	11,251	7,648	1,242,925	21,744	1,221,181		1,221,181
2002	5	1,010	1,279,079	1,292,240	40,137	10,034	1,282,102	693	10,898	7,555	1,299,795	24,636	1,275,159	-10,137	1,265,022
2002	6	1,342	1,276,611	1,712,903	40,059	10,015	1,699,466	919	10,826	9,952	1,722,855	27,441	1,695,414	-13,437	1,681,977
2002	7	1,459	1,276,612	1,862,293	40,059	10,015	1,847,683	982	10,775	10,577	1,872,870	27,424	1,845,446	-14,609	1,830,836
2002	8	1,560	1,277,773	1,992,688	40,096	10,024	1,977,056	1,056	10,765	11,373	2,004,061	29,536	1,974,525	-15,632	1,958,893
2002	9	1,566	1,279,591	2,003,700	40,153	10,038	1,987,981	1,065	10,737	11,434	2,015,134	27,946	1,987,188	-15,719	1,971,469
2002	10	1,327	1,283,631	1,703,776	40,279	10,070	1,690,410	902	10,768	9,710	1,713,486	22,061	1,691,425	-13,366	1,678,059
2002	11	1,038	1,292,064	1,341,598	40,544	10,136	1,331,074	748	11,024	8,245	1,349,844	23,544	1,326,300	-10,525	1,315,775
2002	12	1,064	1,298,999	1,381,901	40,762			800	11,249	9,003	1,390,904	39,665	1,351,239		1,351,239
														-93,425	
						_								Same a	as Sept FcstIII
		FPC	W/O Sebrin	g Commerc	ial Class			Sebring	Only Commer	cial Class					JBC-7
												COML	MWH After		
Year	M	CUPC	Corn Custs	MWh				CUPC	Com Custs	MWh	Combined MWh	DSM Savings	DSM Savings		
2002	1	5.908	145,809	861,432				4,516	1,544	6,973	868,405	29,683	838,722		
2002	2	5,499	145,898	802,295				4,214	1,548	6,523	808,818	25,392	783,426		
2002	3	5,573	146,220	814,924				4,213	1,550	6,531	821,455	20,732	800,723		
2002	4	5,844	146,257	854,715				4,382	1,552	6,802	861,517	20,111	841,406		
2002	5	6,216	146,672	911,770				4,632	1,543	7,147	918,916	21,654	897,262		
2002	6	7,183	146,717	1,053,931				5,338	1,539	8,215	1,062,146	23,567	1,038,579		
2002	7	7,232	146,839	1,061,954				5,333	1,541	8,219	1,070,173	24,914	1,045,259		
2002	8	7,596	146,906	1,115,830				5,622	1,544	8,681	1,124,511	28,544	1,095,967		
2002	9	7,664	146,979	1,126,500				5,679	1,545	8,773	1,135,274	25,177	1,110,097		
2002	10	7,010	147,187	1,031,728				5,205	1,547	8,052	1,039,780	23,434	1,016,346		
2002	11	6,402	147,418	943,841				4,781	1,551	7,415	951,256	24,352	926,904		
2002	12	6,186	147,707	913,674				4,641	1,555	7,216	920,890	30,457	890,433		
2002		5,155		010,014				.,			020,000		000,100		