

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET No. 060162-EI

In re: Petition of Progress Energy Florida, Inc.
to recover modular cooling tower costs.

REVISED DIRECT TESTIMONY OF
JAVIER PORTUONDO

January 22, 2007

1 Q. Please state your name and business address.

2 A. My name is Javier J. Portuondo. My business address is Post Office Box
3 1551, Raleigh, North Carolina 27601.

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by Progress Energy Service Company, LLC, as Director of
7 Regulatory Planning.

CMP _____ 8
COM 5 _____ 9
CTR orig _____
ECR () _____ 10
GCL 1 _____ 11
OPC _____
RCA _____ 12
SCR _____ 13
SGA _____
SEC 1 _____ 14
OTH _____ 15

9 Q. What is the scope of your duties?

A. Currently, I am responsible for regulatory planning, cost recovery and pricing
functions for both Progress Energy Florida (PEF or "Company") and Progress
Energy Carolinas.

14 Q. Please describe your educational background and professional
15 experience.

DOCUMENT NUMBER-DATE

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1 A. I received a Bachelors of Science degree in Accounting from the University of
2 South Florida. I began my employment with Florida Power Corporation in
3 1985. During my 20 years with Florida Power Corporation and PEF, I have
4 held a number of financial and accounting positions. In 1993, I became
5 Manager, Regulatory Services, and I recently became Director, Regulatory
6 Planning.

7

8 **Q. What is the purpose of your testimony?**

9 A. The purpose of my testimony is to support the Company's request for
10 recovery of reasonably and prudently incurred costs of modular cooling
11 towers that PEF installed at its Crystal River plant and placed into service in
12 June 2006. Specifically, in accordance with the Commission's Order No.
13 PSC-06-0771-PCO-EI, which set this matter for hearing, I will explain why the
14 project costs are appropriate for recovery through either the Environmental
15 Cost Recovery Clause (ECRC) or the Fuel and Purchase Power Cost
16 Recovery Clause.

17

18 **Q. Are you sponsoring any Exhibits with your direct testimony?**

19 A. Yes. I am sponsoring the following exhibits:

- 20 • Exhibit No. __ (JP-1), which is an excerpt of Schedule C-6 of the
21 minimum filing requirements (MFRs) that PEF submitted in its recent
22 ratemaking proceeding in Docket No. 050078-EI; and

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- Exhibit No. __ (JP-2), which is an excerpt of Schedule B-8 of the MFRs submitted in Docket No. 050078-EI.

Q. Please briefly describe the Modular Cooling Tower Project.

A. The purpose of the project is two-fold: to ensure compliance with environmental requirements while at the same time reducing fuel replacement and power purchase costs. Specifically, the project involves installation and operation of modular cooling towers in order to minimize “de-rates” of PEF’s Crystal River Units 1 and 2 necessary to comply with the permit limit on the temperature of cooling water discharged from the Crystal River plant (“thermal permit limit”). As discussed in more detail in the pre-filed testimony of Thomas Lawery, the project involves installation and operation of modular cooling towers in the summer months in order to reduce the discharge canal temperatures. This will enable PEF to reduce the number and extent of de-rates necessary to comply with the thermal permit limit and thereby reduce replacement fuel and purchase power costs.

Q. What is the current status of the Modular Cooling Tower Project?’

A. As discussed in Mr. Lawery’s testimony, the Modular Cooling Towers were placed in service in June 2006 and have successfully reduced the number of required de-rates for Crystal River Units 1 and 2.

1 **Q. Please explain why the costs for the Modular Cooling Tower Project are**
2 **eligible for recovery through the Environmental Cost Recovery Clause.**

3 A. The ECRC, Section 366.8255, Florida Statutes, authorizes the Commission
4 to review and approve recovery of environmental compliance costs prudently
5 incurred by electric utilities. In Order No. PSC-94-0044-FOF-EI, the
6 Commission established the policy that recovery of such costs associated
7 with environmental compliance activities should be recoverable through
8 ECRC if:

- 9 1) such costs were prudently incurred after April 13, 1993;
- 10 2) the activity is legally required to comply with a governmentally imposed
11 environmental regulation that was enacted or became effective, or
12 whose effect was triggered after the company's last test year upon
13 which rates are based; and
- 14 3) such costs are not recovered through some other cost recovery
15 mechanism or through base rates.

16
17 The modular cooling tower project satisfies each of these criteria. The need
18 for the modular cooling towers was triggered by the unusually high inlet water
19 temperatures for extended periods during the summer of 2005. These high
20 temperatures led to unprecedented de-ratings of the Crystal River plants
21 which were necessary to comply with the permit limit for the temperature of
22 cooling water discharged from the plant. Project costs are being prudently
23 incurred after April 13, 1993. The activity is legally required to comply with a

1 governmentally imposed environmental regulation which was triggered by the
2 unanticipated high inlet water temperatures after the Company's last
3 ratemaking proceeding in Docket No. 050078-EI. Finally, as further
4 discussed below, the project costs are not recovered through base rates.

5
6 **Q. Were you involved in PEF's last ratemaking proceeding in Docket No.**
7 **050078-EI?**

8 A. Yes. I submitted pre-filed testimony in that docket and I was responsible for
9 the preparation of the MFRs that PEF submitted on April 29, 2005.

10
11 **Q. What are the projected costs of the modular cooling tower project?**

12 A. As Mr. Lawery explains in his testimony, PEF incurred \$516,000 capital costs
13 and \$4.6 million in O&M costs for the project during 2006. In future years,
14 the project is estimated to cost approximately \$3 to \$4 million annually. The
15 annual expenditures are expected to include O&M expenses for unit
16 mobilization and setup, rental fees, de-mobilization, and fill replacement.

17
18 **Q. Are the costs of the modular cooling tower project recovered through**
19 **the base rates established in Docket No. 050078-EI?**

20 A. No. The modular cooling tower project was not anticipated when PEF's
21 current base rates were established/approved in Docket No. 050078-EI. The
22 Company's evaluation of the project was prompted by unusually high inlet
23 water temperatures and associated de-rates during the summer of 2005.

1 Thus, the costs of the project were not anticipated when the Company
2 submitted its rate case MFRs in April 2005 and are not included in the
3 Company's base rates. This is demonstrated by Exhibit Nos. ___ (JP-1) and
4 ___ (JP-2).

5
6 Exhibit No. ___ (JP-1) is an excerpt (page 3) from MFR Schedule C-6. Among
7 other things, Schedule C-6 presented the Company's projected operating
8 budget for the 2006 test year. As shown on line 12 of Exhibit No. ___ (JP-1),
9 the Company projected no rental costs associated with its fossil fuel-fired
10 steam generating units. Had rental costs associated with the modular cooling
11 towers been anticipated when the MFRs were filed, such costs would have
12 been reflected on that line.

13
14 Exhibit No. ___ (JP-2) is an excerpt (page 1) from MFR Schedule B-8. That
15 schedule presented the monthly plant balances for the projected 2006 test
16 year. Had PEF anticipated capital expenditures associated with the cooling
17 tower project, the resulting plant addition would have been reflected on line
18 26 for FERC account 314. See 18 CFR Part 101, p. 382 (4-1-05 edition)
19 (defining account 314 to include "all costs installed of main turbine-driven
20 units and all accessory equipment" such as the "Cooling system, including
21 towers[.]"). However, the monthly balances shown on that line do not include
22 any increases that would accommodate plant additions for the modular
23 cooling towers.

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The costs of the modular cooling towers also were not anticipated when the Commission approved PEF's current base rates. As noted above, the Company's evaluation of the project was prompted by record high temperatures and de-rates in the summer of 2005. The evaluation was not completed until after the Commission approved PEF's current rates in September 2005.

Q. Please explain why the costs for the Modular Cooling Tower Project are eligible for recovery through the Fuel and Purchase Power Recovery Clause.

A. In 1985, Commission Order No. 14546 established comprehensive guidelines for the recovery of costs through the Fuel Clause. In that Order, the Commission recognized that certain unanticipated costs are appropriate for recovery through the Fuel Clause. Specifically, the Commission recognized that recovery is appropriate for:

Fossil fuel-related costs normally recovered through base rates but which were not recognized or anticipated in the cost levels used to determine current base rates and which, if expended, will result in fuel savings to customers. Recovery of such costs should be made on a case by case basis after Commission approval.

1 The Commission repeatedly has approved recovery of unanticipated costs
2 through the Fuel Clause when those expenditures resulted in significant
3 savings to the utility's ratepayers. See e.g., Order Nos. PSC-98-0412-FOF-
4 EI, PSC-97-0359-FOF-EI, PSC-97-0359-FOF-EI, PSC-97-0359-FOF-EI,
5 PSC-96-1172-FOF-EI, PSC-95-0450-FOF-EI, and PSC-94-1106-FOF-EI. As
6 discussed above, the costs of the modular cooling tower project were
7 unanticipated at the time of PEF's last rate case filing and, as I will explain
8 below, the project will result in significant fuel cost savings to PEF's
9 ratepayers. As such, the costs of this project qualify for recovery through the
10 Fuel Clause under the policy set forth in Order No. 14546.

11
12 **Q. Please describe the Company's analysis of fuel cost savings estimated**
13 **as a result of the cooling tower project.**

14 A. Fuel cost savings were analyzed based on the amount of avoided de-rates
15 that are expected to result from the project. First, historical de-rate amounts
16 attributable to the thermal limit were compiled for the years 2003-2005. Each
17 hourly de-rate amount was distributed throughout the May-September period
18 being evaluated based on the hourly load forecast for that period. The
19 highest hourly de-rate amount recorded during the historical period was
20 assigned to the hour with the highest projected load for the forecast period.
21 The hour with the second highest de-rate amount was assigned to the hour
22 with next highest projected load, and so forth. This pattern continued in order

1 of descending de-rate volumes until each expected hour of de-rate had been
2 assigned.

3
4 For modeling purposes, the data was summarized into a “typical” week profile
5 for each month in the evaluation period. Avoided de-rates were capped at
6 330 MW based on the physical limitations of the modular cooling towers. The
7 resulting profiles were then used as inputs to a dispatch simulation model,
8 which projected total system costs. These costs were compared against a
9 scenario in which no thermal de-rate parameters were imposed on the
10 system. The difference in costs was then used to derive the \$/mwh benefit of
11 avoiding thermal de-rates. This represents gross fuel savings. Because the
12 modular cooling towers are expected to use approximately 6 MWs of auxiliary
13 power, the cost of this auxiliary power was subtracted from the gross fuel
14 savings to arrive at net fuel savings.

15
16 **Q. What were the results of the fuel cost savings analysis?**

17 A. The cooling tower project was projected to result in cumulative net fuel cost
18 savings of approximately \$45 million over five years. Additionally, annual fuel
19 cost savings were projected to exceed the estimated costs of the project in
20 each of the five years.

21
22 **Q. How does the Company propose to recover the costs of the project?**

1 | A. PEF proposes to recover all capital and O&M costs incurred for the project.
2 | Actual costs incurred for the project would be subject to Commission review
3 | for prudence and reasonableness as they are submitted for recovery through
4 | either the Environmental Cost Recovery Clause or the Fuel and Purchase
5 | Power Cost Recovery Clause.

6 |

7 | **Q. Does this conclude your testimony?**

8 | A. Yes, it does.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

PROGRESS ENERGY FLORIDA

DOCKET NO. 050078-EI

MINIMUM FILING REQUIREMENTS

**SECTION C - NET OPERATING INCOME SCHEDULES
SECTION D - COST OF CAPITAL SCHEDULES**



DOCUMENT NUMBER-DATE

04221 APR 29 08

FPSC-COMMISSION CLERK

FLORIDA PUBLIC SERVICE COMMISSION

Explanation If the test year is PROJECTED, provide the budgeted versus actual operating revenues and expenses by primary account for a historical five year period and the forecasted data for the test year and the prior year.

Type of data shown

XX Projected Test Year Ended 12/31/2006
 XX Prior Year Ended 12/31/2005
 XX Historical Year Ended 12/31/2004

Company, PROGRESS ENERGY FLORIDA INC

Docket No 050078 E

Witness: Portuondo / DeSouza / Williams / Young / McDonald / Bazemore

Progress Energy Florida
 Docket No. _____
 Witness: Javier Portuondo
 Exhibit No. ____ (JP-1)
 Page 2 of 2

Line No	Account No	(B) Account Title	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)
			2000 Actual	2000 Budget	2001 Actual	2001 Budget	2002 Actual	2002 Budget	2003 Actual	2003 Budget	2004 Actual	2004 Budget	2005 Budget	2006 Budget
1	5012000	Fossil Steam Fuel	4,709	7,286	5,748	8,368	7,804	9,057	5,995	6,224	3,978	5,132	3,917	3,995
2	5182300	Nuclear Fuel - Misc & Labor	53	29	1,322	-	1,575	1,652	1,577	1,634	1,590	1,640	1,594	1,618
3	5472600	C1 Fuel NP	559	590	618	5,276	702	1,120	2,319	-	2,258	3,200	3,147	3,088
4		Non-Recoverable Fuel Handling Expense	5,321	7,905	7,688	13,644	10,082	11,829	9,890	7,858	7,826	9,972	8,659	8,702
5														
6		Operating Expenses - Other Base Recoverable												
7	5000000	Oper Supv & Engineering	20,933	16,176	19,460	17,254	2,173	3,648	1,475	3,990	1,638	2,418	2,352	2,494
8	5020000	Steam Expenses	3,875	5,729	3,704	6,186	6,702	1,992	7,612	4,765	8,606	8,213	7,177	7,307
9	5040000	Steam Trans - Cr - Steam Prod	(272)	(200)	(238)	(206)	-	-	-	-	-	-	-	-
10	5050000	Electric Expenses	1,247	2,378	1,431	1,364	(65)	87	0	322	1	263	304	304
11	5060000	Misc Sim Power Exp	18,988	13,596	11,149	13,446	21,826	17,648	21,683	25,068	18,287	20,010	21,240	24,698
12	5070000	Rents	508	626	-	-	-	-	-	-	-	-	-	-
13		Steam (FOS) Operations	45,279	38,905	35,507	38,044	30,636	23,375	30,771	35,146	28,533	30,904	31,073	34,803
14	5170000	Oper Supv & Eng - Nuclear	36,749	40,794	30,071	35,215	211	(126)	136	42	6	(0)	376	386
15	5190000	Nuclear Coolants & Water	-	-	-	-	2,931	2,407	2,872	3,157	2,682	3,183	3,020	3,054
16	5200000	Steam Expenses - Nuclear	225	184	195	189	8,618	11,331	10,832	10,367	9,275	9,865	10,630	10,691
17	5210000	Steam From Oth Source - Nuc	23	-	27	-	-	-	-	-	-	-	-	-
18	5230000	Nuclear Electric Expenses	-	-	-	-	-	-	-	-	4	-	13	11
19	5240000	Misc Nuc Power Exp - Train	22,908	22,224	19,669	13,597	28,280	28,566	29,549	24,023	29,247	32,388	32,317	34,894
20	5250000	Rents Nuclear	12	16	(0)	-	-	-	-	-	-	-	-	-
21		Nuclear Operations	59,917	63,218	48,962	48,001	40,041	42,178	43,390	37,589	41,214	45,436	46,356	49,037
22	5460000	Oper Supv & Engineering	6,484	7,622	7,213	9,849	2,716	7,102	7,465	9,855	8,387	7,570	6,200	6,753
23	5480000	Generation Expenses	805	819	858	828	727	-	3,605	782	4,223	331	180	730
24	5490000	Misc Oth Power Gen Exps	5,853	5,744	5,196	7,261	8,556	9,229	5,520	10,020	6,150	8,362	8,946	9,426
25	5500000	Rents	165	350	325	676	-	-	-	-	-	-	-	-
26		CT Operations	13,307	14,535	13,592	18,614	12,000	16,331	16,591	20,658	18,760	16,262	15,326	16,408
27	5550000	Sys Con & Load Dispatch	-	-	-	12	4,532	6,411	4,889	5,247	5,066	6,037	2,684	2,839
28	5570001	Other Power Supply Expenses	-	-	-	-	-	-	-	-	23	-	-	-
29		Other Power Supply Exp - Operations	-	-	-	12	4,532	6,411	4,889	5,247	5,089	6,037	2,684	2,839
30	5600000	Oper Supv & Engineering	2,289	3,047	3,304	4,755	2,617	2,926	2,600	1,350	2,606	208	1,837	1,837
31	5610000	Load Dispatching	4,418	5,827	5,517	5,511	400	-	339	314	381	(2)	4,026	4,258
32	5620000	Trans Station Expenses	297	153	11	-	510	268	159	319	183	272	277	278
33	5630000	Trans Overhead Line Expenses	-	-	-	-	56	265	53	62	313	65	70	70
34	5650000	Trans of Electricity by Others	5,398	10,435	7,016	10,436	1,178	-	-	-	3	-	-	-
35	5660000	Misc Transmission Exps	5,147	4,865	6,248	3,583	15,408	21,335	12,831	16,921	12,744	16,724	11,423	11,244
36	5670000	Substation	8	8	7	6	-	-	-	-	0	-	-	-
37		Transmission Operations	17,556	24,335	22,098	24,291	20,170	24,795	15,981	18,966	16,230	17,266	17,633	17,681

Supporting Schedules

Recap Schedules

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

PROGRESS ENERGY FLORIDA

DOCKET NO. 050078-EI

MINIMUM FILING REQUIREMENTS

**SECTION A – SUMMARY SCHEDULES
SECTION B – RATE BASE SCHEDULES**



DOCUMENT NUMBER DATE

04220 APR 29 12

FPSC-COMMISSION CLERK

SCHEDULE B-E

MONTHLY PLANT BALANCES TEST YEAR - 13 MONTHS

FLORIDA PUBLIC SERVICE COMMISSION

Explanation: Provide the monthly plant balances for each account or sub-account to which an individual depreciation rate is applied. These balances should be the ones used to compute the monthly depreciation expenses excluding any amortization/recovery schedules.
 (\$000)

Type of Data Shown:

XX Projected Test Year Ended 12/31/2005
 ___ Prior Year Ended 12/31/2005
 ___ Historical Test Year Ended 12/31/2004

Company: PROGRESS ENERGY FLORIDA INC

Docket No. 056078-EI

Witness: Foranville, Bateman, Williams, Young, McDonald, Driscoll

Line No.	(A) Account/ Sub-account Number	(B) Account/ Sub-account Title	(C)-(AD) Months													13-Month Average	
			(C) Dec-2005 Month	(D) Jan-2006 Month	(E) Feb-2006 Month	(F) Mar-2006 Month	(G) Apr-2006 Month	(H) May-2006 Month	(I) Jun-2006 Month	(J) Jul-2006 Month	(K) Aug-2006 Month	(L) Sep-2006 Month	(M) Oct-2006 Month	(N) Nov-2006 Month	(O) Dec-2006 Month		
1																	
2		Steam Production															
3		Ancoke Plant															
4	311	Structures & Improvements	38,595	38,662	38,719	38,768	38,811	38,848	38,879	38,905	38,928	38,948	38,964	38,984	39,000	38,847	
5	312	Boiler Plant Equipment	106,791	107,017	107,247	107,515	107,811	108,103	108,367	108,615	108,833	109,058	109,257	109,537	109,790	108,303	
6	314	Turbogenerator Units	96,166	96,306	96,486	96,741	97,056	97,381	97,683	97,974	98,234	98,508	98,754	98,113	99,440	97,580	
7	315	Accessory Electric Equipment	26,080	26,083	26,091	26,106	26,126	26,148	26,169	26,189	26,207	26,227	26,245	26,272	26,296	26,172	
8	316.1	Miscellaneous Equipment	5,768	5,773	5,778	5,785	5,793	5,801	5,808	5,815	5,822	5,828	5,834	5,842	5,850	5,808	
9	316.2	Miscellaneous Equipment - 5 Year Amort	122	122	122	122	122	122	122	122	122	122	122	122	122	122	
10	316.3	Miscellaneous Equipment - 7 Year Amort	192	193	193	194	194	195	195	195	195	195	196	196	196	194	
11		Total Ancoke Plant	273,714	274,156	274,636	275,231	275,913	276,597	277,223	277,817	278,341	278,886	279,371	280,055	280,694	277,126	
12																	
13		Barlow Plant															
14	311	Structures & Improvements	19,805	19,981	20,123	20,236	20,326	20,399	20,457	20,503	20,540	20,570	20,594	20,613	20,528	20,367	
15	312	Boiler Plant Equipment	63,220	63,246	63,269	63,292	63,316	63,337	63,356	63,374	63,389	63,404	63,417	63,434	63,449	63,346	
16	314	Turbogenerator Units	26,464	26,484	26,502	26,522	26,542	26,561	26,579	26,594	26,608	26,622	26,634	26,651	26,656	26,572	
17	315	Accessory Electric Equipment	13,680	13,680	13,681	13,682	13,682	13,683	13,683	13,683	13,683	13,683	13,683	13,684	13,684	13,682	
18	316.1	Miscellaneous Equipment	3,070	3,072	3,083	3,108	3,144	3,184	3,222	3,259	3,293	3,330	3,363	3,414	3,460	3,231	
19	316.2	Miscellaneous Equipment - 5 Year Amort	192	193	193	194	194	195	195	195	195	196	196	196	196	196	
20	316.3	Miscellaneous Equipment - 7 Year Amort	163	167	171	173	175	177	179	180	181	181	182	182	183	176	
21		Total Barlow Plant	126,594	126,823	127,022	127,207	127,380	127,536	127,670	127,789	127,889	127,986	128,069	128,172	128,264	127,569	
22																	
23		Crystal River 1 & 2 Plant															
24	311	Structures & Improvements	74,629	74,637	74,644	74,650	74,655	74,662	74,666	74,670	74,674	74,677	74,680	74,683	74,686	74,663	
25	312	Boiler Plant Equipment	166,618	166,765	166,953	167,217	167,541	167,875	168,186	168,465	168,751	169,032	169,284	169,652	169,987	168,180	
26	314	Turbogenerator Units	124,728	124,900	125,076	125,268	125,521	125,752	125,961	126,158	126,332	126,511	126,670	126,894	127,097	125,915	
27	315	Accessory Electric Equipment	34,532	34,545	34,559	34,575	34,595	34,614	34,632	34,649	34,664	34,680	34,694	34,713	34,731	34,630	
28	316.1	Miscellaneous Equipment	5,966	5,963	5,970	5,975	5,980	5,985	5,988	5,991	5,994	5,996	5,998	6,000	6,002	5,985	
29	316.2	Miscellaneous Equipment - 5 Year Amort	153	154	154	155	155	155	155	155	156	156	156	156	156	155	
30	316.3	Miscellaneous Equipment - 7 Year Amort	98	98	98	98	98	98	98	98	98	98	98	98	98	98	
31		Total Crystal River 1 & 2 Plant	406,714	407,362	407,455	407,958	408,546	409,140	409,687	410,207	410,668	411,149	411,576	412,196	412,757	409,524	
32																	
33		Crystal River 4 & 5 Plant															
34	311	Structures & Improvements	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	149,119	
35	312	Boiler Plant Equipment	466,104	466,124	466,139	466,152	466,162	466,170	466,176	466,181	466,185	466,188	466,191	466,193	466,195	466,166	
36	314	Turbogenerator Units	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	192,498	
37	315	Accessory Electric Equipment	81,115	81,122	81,128	81,133	81,136	81,139	81,142	81,144	81,145	81,145	81,145	81,147	81,149	81,138	
38	316.1	Miscellaneous Equipment	11,485	11,485	11,485	11,485	11,485	11,486	11,486	11,486	11,486	11,486	11,486	11,486	11,486	11,486	
39	316.2	Miscellaneous Equipment - 5 Year Amort	242	243	243	243	243	243	243	243	243	243	243	243	243	243	
40	316.3	Miscellaneous Equipment - 7 Year Amort	615	615	615	615	615	615	615	615	615	615	615	615	615	615	
41		Total Crystal River 4 & 5 Plant	901,179	901,206	901,227	901,245	901,258	901,269	901,278	901,285	901,291	901,296	901,299	901,302	901,304	901,265	
42																	

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