

State of Florida



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## Public Service Commission

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

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**DATE:** July 14, 2009  
**TO:** John Slemkewicz, Public Utilities Supervisor, Economic Regulation  
**FROM:** Dale N. Mailhot, Assistant Director, Division of Regulatory Compliance  
**RE:** Docket No.: 080677-EI  
Company Name: Florida Power & Light Company  
Company Code: EI802  
Audit Purpose: Rate Case  
Audit Control No: 09-110-4-1

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Attached is the final audit report for the utility stated above. I am sending the utility a copy of this memo and the audit report. If the utility desires to file a response to the audit report, it should send a response to the Office of the Commission Clerk. There are confidential work papers associated with this audit.

DNM/ch

Attachment: Audit Report

cc: Division of Regulatory Compliance (Salak, Mailhot, Harvey,  
Miami District Office, Tampa District Office, File Folder)  
Office of Commission Clerk  
Office of the General Counsel

Ms. Natalie Smith  
Florida Power & Light  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859

Mr. Wade Litchfield  
Florida Power & Light  
700 Universe Boulevard  
Juno Beach, FL 33408-0420

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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## FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF REGULATORY COMPLIANCE  
Bureau of Auditing

*Miami District Office*

FLORIDA POWER AND LIGHT COMPANY

RATE CASE

YEAR ENDED DECEMBER 31, 2008

DOCKET NO. 080677-EI  
AUDIT CONTROL NO. 09-110-4-1

Handwritten signature of Iliana Piedra in cursive script.

Iliana Piedra  
Audit Manager

Handwritten signature of Gabriela Leon in cursive script.

Gabriela Leon  
Audit Staff

Handwritten signature of Bety Maitre in cursive script.

Bety Maitre  
Audit Staff

Handwritten signature of Yen Ngo in cursive script.

Yen Ngo  
Audit Staff

Handwritten signature of Kathy Welch in cursive script.

Kathy Welch  
Public Utilities Supervisor

DOCUMENT NUMBER-DATE

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EPSC-COMMISSION OF ENERGY

**DIVISION OF REGULATORY COMPLIANCE  
AUDITOR'S REPORT**

**July 9, 2009**

**TO: FLORIDA PUBLIC SERVICE COMMISSION**

We have performed the procedures enumerated later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request. We have applied these procedures to the attached schedules prepared by Florida Power and Light Company in support of its Rate Case Filing for the 2008 test year, Docket No. 080677-EI.

*This audit is performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. Our report is based on agreed upon procedures and the report is intended only for internal Commission use.*

## **OBJECTIVES AND PROCEDURES:**

**Objective:** The objective was to verify the amounts shown as the “per books” balances for rate base, net operating income, and capital structure for the historical base year.

**Procedure:** We obtained a 13-month trial balance and reconciled it to the general ledger and to the filing for rate base, net operating income and capital structure.

**Objective:** The objective was to verify that the adjustments to rate base and net operating income for the historic base year were consistent with the Commission’s findings in prior cases and are calculated correctly.

**Procedures:** We reconciled the adjustments to the ledger or other supporting documentation. We verified that the adjustments were necessary based on past orders or rules. *Audit findings 2 and 3 discuss corrections to both rate base and net operating income adjustments for 2008.*

**Objective:** The objective of the audit was to review the allocation methodology between FPL and its affiliates for rate base and NOI items. We were also to determine whether the original amounts to be allocated and the methodology was reasonable and were to check the basis for accuracy and consistent application. The objective of the audit was also to review intercompany charges to and from divisions, affiliated companies, and non-regulated operations to determine if an appropriate amount of costs were allocated pursuant to Rule 25-6.1351, F.A.C.

**Procedures:** We reviewed the methodology used to allocate the management fee, the generation division allocation, the nuclear division allocation and the energy marketing and trading allocation for reasonableness and traced amounts to source documents. We compared the methodology to the allocation methodology in the last rate case. We obtained supporting documentation for the factors used. We reviewed other budget units to determine if other costs should have been included. We selected a sample of the entries charged from FPL to affiliates and from affiliates to FPL and reviewed the source documentation supporting the entries. We reviewed samples of work orders, working capital accounts and expense accounts to determine if they contained rate base or expense items that should have been allocated but were not.

**Objective:** The objective of the audit was to verify the 13-month average plant balances, reserve balances and depreciation expense for each plant account for the historical base year. In addition, we were to verify the plant additions, retirements and adjustments from the last field audit through the most recent actual data.

**Procedures:** We obtained 13-month average trial balances and reconciled them to the general ledger and to the filing. We reconciled the last rate case trial balance to the *beginning balance for plant and the reserve balances*. We selected work orders added since the last rate case and tested the additions to supporting documentation. We also

selected retirement work orders and verified the service years of the assets to the Commission Order.

**Objective:** The objective of the audit was to verify that the depreciation rates used for the historical base year are those approved in Orders No. PSC-05-0902-S-EI and PSC-08-0095-PAA-EI.

**Procedures:** We obtained the depreciation schedules, reconciled them to the ledgers and the filing and compared the rates used to the above orders.

**Objective:** The objective of the audit was to determine if pursuant to Rule 25-6.0141, F.A.C., FPL has included any construction work in progress projects in rate base that are eligible for the allowance for funds during construction (AFUDC).

**Procedure:** We obtained the list of projects included in construction work in progress in rate base and determined if they were eligible for AFUDC according to the rule. AFUDC was recalculated for the work order tested.

**Objective:** The objective of the audit was to determine if any working capital accounts are interest-bearing and if they were to provide the corresponding interest revenue or expense, how it was calculated, and its location in the filing.

**Procedures:** The accounts included in working capital were obtained and reviewed for items that may earn interest. The interest income and expense accounts were reviewed and we verified that the accounts associated with interest were not included in working capital unless the interest also was.

**Objective:** The objective of the audit was to review transactions in clearing accounts, stores expense, prepayments, deferred debits, deferred credits, and accrued liabilities to determine if they were proper, utility in nature, and that expenses were not overstated. We also were to review materials and supplies and other accounts receivable for non-utility items.

**Procedures:** We determined which of these accounts were included in working capital and selected the material accounts. We sampled these accounts and traced the items to source documentation to determine if they were related to the utility and appropriately charged to working capital.

**Objective:** The objective of the audit was to determine whether the Company is in compliance with the provisions of Rule 25-6.0143, F.A.C. for account 228.1 Accumulated Provision for Property Insurance, 228.2 Accumulated Provision for Injuries and Damages, and 228.4 Accumulated Miscellaneous Operating Provisions.

**Procedures:** We sampled these accounts and traced the items to source documentation to determine if they were related to the utility and appropriately charged to working capital.

**Objective:** The objective of the audit was to verify that unbilled revenues were correctly calculated.

**Procedures:** The unbilled revenue calculation was reviewed for reasonableness and traced to the filing.

**Objective:** The objective of the audit was to verify that historical base year operation and maintenance transactions were prudent, adequately supported by documentation, recorded in compliance with the Uniform System of Accounts and in the correct amounts.

**Procedure:** We prepared an analytical review of expenses. We compared the expenses in 2008 to 2007 and to 2002 and determined accounts that appeared to have increased higher than inflation. We obtained computerized ledger data for these accounts and reviewed all entries to these accounts that were over \$150,000. We sampled most of these entries. In addition, we wrote programs to develop statistics for the dollars between \$1,000 and \$150,000. Based on those statistics, we selected samples of those dollar ranges. We obtained source documentation for all sample items selected. The source documentation was reviewed to determine if the amounts were for the proper period, were in the correct account, were re-occurring, and were not related to the affiliates. Audit findings 1, 4, 5 and 6 discuss items that need to be followed up in the review of the forecast.

**Objective:** The objective of the audit was to review the types of ads included in historical operating expenses to determine if they are image enhancing in nature, promotional, related to non-utility operations or one of the recovery clauses.

**Procedures:** We selected a sample of the advertising account and reviewed the sample ads.

**Objective:** The objective of the audit was to review the detail of 2008 legal fees and other outside service expenses, sales expenses, customer service expenses, office supplies and expense, and miscellaneous general expenses.

**Procedures:** Sales expense and miscellaneous expense were sampled based on the analytical review. We obtained a list of all legal cases and the dollars expended. We reviewed the list to determine if any of the cases related to affiliates and questioned the utility on cases that could not be determined based on the titles. The other accounts did not significantly increase and were discussed with the analyst. He agreed that we would not pursue these expenses.

**Objective:** The objective of the audit was to review liability and health and life insurance expense during and subsequent to the test period to determine if FPL received refunds based on loss experience. The allocations to the affiliate companies were also reviewed.

**Procedures:** Since insurance is charged to affiliates in the "ER 99" entries, we reviewed insurance entries in the review of affiliate transactions. Refunds were included in the test year expenses.

**Objective:** The objective of the audit was to verify that sales tax collection discounts are recorded above the line.

**Procedures:** We obtained the sales tax reports and compared them to the sales tax accounts to determine where the discounts were reported.

**Objective:** The objective of the audit was to reconcile gross receipts tax and regulatory assessment fees to the tax return and/or allocation schedules and to the ledger. The objective was also to reconcile the federal and state income taxes to the company's schedules and to the ledger.

**Procedures:** The above taxes in the 2008 filing were traced to the returns and the ledger. The 2008 state and federal income tax returns have not been filed yet.

**Objective:** The objective of the audit was to verify deferred income tax expense and deferred tax balances, to include proper bonus depreciation treatment of property additions.

**Procedures:** We traced the deferred income tax balances to the company's schedules and tax reports.

**Objective:** The objective of the audit was to follow the standard audit program for taxes other than income tax.

**Procedures:** We traced the 2008 filing for taxes other than income taxes to the ledger and reconciled to the tax returns.

**Objective:** The objective of the audit was to verify how any nonutility assets supported by the utility's capital structure are removed from the capital structure in the rate base/capital structure reconciliation by obtaining a list of all non-regulated/nonutility services that FPL is currently providing.

**Procedures:** We obtained the rate base/capital structure reconciliation and determined that the non-utility adjustments removed in rate base were removed in the capital structure.

**Objective:** The objective of the audit was to verify that FPL's book amounts for average balance sheet items included in the capital structure agree with the general ledger.



**Procedures:** We obtained a 13-month average trial balance and reconciled it to the general ledger and to the cost of capital filings.

**Objective:** The objective of the audit was to verify that the cost rates being used in the computation of cost of capital are appropriate.

**Procedures:** We reconciled the cost of capital cost rates for 2008 to the debt documentation, prior audits, and external audit workpapers.

**Objective:** The objective of the audit was to obtain a reconciliation indicating how each rate base adjustment was adjusted in the capital structure and reconcile it to the general ledger and the filing.

**Procedures:** We obtained a reconciliation indicating how each rate base adjustment was adjusted in the capital structure and reconciled it to the general ledger and the filing.

**Objective:** The objective of the audit was to follow-up on exceptions and disclosures noted in the last Federal Energy Regulatory Commission (FERC) audit and the last outside accounting audit to determine if they are applicable to this case.

**Procedures:** We reviewed the internal and external audits to determine if there were any adjustments that materially affected the 2008 test year. We read the FERC audit and determined that the adjustments were made and that FPL changed its procedures.

**AUDIT FINDING NO. 1**

**SUBJECT: STORAGE FEES**

**AUDIT ANALYSIS:** Account 549, Miscellaneous Other Power Generation Expense, included \$810,000 in 2008 for storage expenses for two combustion turbines. FPL Group had a master agreement with General Electric to purchase two combustion turbines. According to FPL, this agreement resulted in pricing that was less than the current market value. FPL claims that at the time the agreement was made, the industry was experiencing failures of critical components in the combustion turbine units. If one of the existing units were to fail, parts from these units would significantly reduce the time required to return the unit to service. Therefore, they had the units built and are keeping them in storage. The cost of the units was recorded on the books of FPL Group in 2007.

**EFFECT ON THE GENERAL LEDGER:** For informational purposes only.

**EFFECT ON THE FILING:** Tallahassee staff needs to determine if this storage continues to the 2010 and 2011 forecasts.

## **AUDIT FINDING NO. 2**

### **SUBJECT: RATE BASE ADJUSTMENTS**

**AUDIT ANALYSIS:** FPL did not remove three construction projects that were recovered in the Environmental Cost Recovery Clause from construction work in progress in the 2008 adjustments to Rate Base. The 13-month average for the three projects was \$1,325,098. This amount should be removed from construction work in progress in 2008.

**EFFECT ON THE GENERAL LEDGER:** The adjustment was made for the filing only and has no effect on the ledger.

**EFFECT ON THE FILING:** Tallahassee staff needs to determine if this error continues to the 2010 and 2011 forecasts.

**AUDIT FINDING NO. 3**

**SUBJECT: NET OPERATING INCOME ADJUSTMENTS**

**AUDIT ANALYSIS:** FPL did not remove a revenue account that was included in the Fuel Cost Recovery Clause. The Fuel account that should be excluded was account 456.23 for \$1,512,367.96. Revenue needs to be decreased by \$1,512,367.96 to remove this account.

**EFFECT ON THE GENERAL LEDGER:** The adjustment was made for the filing only and has no effect on the ledger.

**EFFECT ON THE FILING:** Tallahassee staff needs to determine if this error continues to the 2010 and 2011 forecasts.

**AUDIT FINDING NO. 4**

**SUBJECT: GREEN POWER CONSERVATION EXPENSE**

**AUDIT ANALYSIS:** In 2008, FPL included in account 908.000 – Customer Assistance Expense, a total of \$625,812 related to the Green Power Conservation Program. Commission Order No. PSC-08-0600-PAA-EI terminated the utility's Sunshine Energy Program. The utility transferred the net costs of the program for 2007 and 2008 from Account 908.265 – Green Power Program to Account 908.000. The charges related to 2007 and 2008 are \$14,100 and \$611,712, respectively. These are not recurring expenses.

**EFFECT ON GENERAL LEDGER:** For informational purposes only.

**EFFECT ON THE FILING:** Tallahassee staff needs to determine if this amount continues to the 2010 and 2011 forecasts.

**AUDIT FINDING NO. 5**

**SUBJECT: OIL SPILL EXPENSE**

**AUDIT ANALYSIS:** During the test of expenses, it was determined that cost of emergency oil spill cleanups were being booked in Account 512 – Maintenance of Boiler Plant.

We found three invoices totaling \$618,673 in the sample selection, which related to oil spill cleanup by SWS First Response.

This is not a recurring expense and the Tallahassee staff should determine how it was handled in the forecasts.

**EFFECT ON GENERAL LEDGER:** The finding is for informational purposes only.

**EFFECT ON FILING:** Tallahassee staff needs to determine if the item is reoccurring and included in the 2010 and 2011 forecasts.

**AUDIT FINDING NO. 6**

**SUBJECT: ECONOMIC RECOVERY WRITE OFF TO EXPENSE**

**AUDIT ANALYSIS:** During the test of expenses, we found an economic recovery write off for Holtec Metamic Material booked in Account 524 – Miscellaneous Nuclear Power Expenses in the sum of \$350,000.

The metamic materials are utilized in the internal baskets that hold the spent fuel assemblies within the canister and function as neutron absorbers. The project was cancelled and FPL booked the estimated recovery to sell the scrap metal. The \$350,000 write off is the difference between the \$750,000 economic recovery estimate recorded in Fall 2006 and the \$400,000 actual realized through the Holtec purchase orders executed in Fall 2008.

This is not a recurring expense and the Tallahassee staff should determine how it was handled in the forecasts.

**EFFECT ON GENERAL LEDGER:** The finding is for informational purposes only.

**EFFECT ON FILING:** Tallahassee staff needs to determine if the item is reoccurring and included in the 2010 and 2011 forecasts.

**COMPANY EXHIBITS**



FLORIDA PUBLIC SERVICE COMMISSION

COMPANY: FLORIDA POWER & LIGHT COMPANY  
AND SUBSIDIARIES

DOCKET NO.: 080877-EI

EXPLANATION:  
PROVIDE A SCHEDULE OF THE 13-MONTH AVERAGE  
ADJUSTED RATE BASE FOR THE TEST YEAR, THE  
PRIOR YEAR AND THE MOST RECENT HISTORICAL  
YEAR. PROVIDE THE DETAILS OF ALL ADJUSTMENTS  
ON SCHEDULE B-2.

TYPE OF DATA SHOWN:

- PROJECTED TEST YEAR ENDED 12/31/10
- PRIOR YEAR ENDED 12/31/09
- HISTORICAL TEST YEAR ENDED 12/31/08
- PROJ. SUBSEQUENT YR ENDED 12/31/11

(\$000)

WITNESS: Kim Ousdahl

LINE NO.	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
		PLANT IN SERVICE	ACCUMULATED PROVISION FOR DEPRECIATION & AMORTIZATION	NET PLANT IN SERVICE (1 - 2)	CWIP	PLANT HELD FOR FUTURE USE	NUCLEAR FUEL	NET UTILITY PLANT	WORKING CAPITAL ALLOWANCE	OTHER RATE BASE ITEMS	TOTAL RATE BASE
1	UTILITY PER BOOK	25,926,025	11,930,886	13,995,139	1,335,736	132,603	315,560	15,779,039	(638,807)	0	15,140,232
2	SEPARATION FACTOR	0.993838	0.993477	0.994146	0.990508	0.994816	0.995219	0.993865	0.994477	0.000000	0.993839
3	JURIS UTILITY	25,766,274	11,853,060	13,913,214	1,323,057	131,916	314,052	15,682,239	(635,279)	0	15,046,960
4	COMMISSION ADJUSTMENTS	(378,898)	(304,801)	(74,097)	(882,767)	0	(314,052)	(1,270,915)	995,951	0	(274,965)
5	COMPANY ADJUSTMENTS	0	0	0	0	0	0	0	0	0	0
6	TOTAL ADJUSTMENTS	(378,898)	(304,801)	(74,097)	(882,767)	0	(314,052)	(1,270,915)	995,951	0	(274,965)
7	JURIS ADJ UTILITY	<u>25,387,376</u>	<u>11,548,259</u>	<u>13,839,117</u>	<u>440,291</u>	<u>131,916</u>	<u>0</u>	<u>14,411,323</u>	<u>360,672</u>	<u>0</u>	<u>14,771,995</u>
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9											
10											
11											
12											
13											
14											
15											
16											
17	NOTE: TOTALS MAY NOT ADD DUE TO ROUNDING.										

FLORIDA PUBLIC SERVICE COMMISSION  
 COMPANY: FLORIDA POWER & LIGHT COMPANY  
 AND SUBSIDIARIES

EXPLANATION:  
 PROVIDE THE CALCULATION OF JURISDICTIONAL NET OPERATING INCOME  
 FOR THE TEST YEAR, THE PRIOR YEAR AND THE MOST RECENT HISTORICAL  
 YEAR.

TYPE OF DATA SHOWN:  
 \_\_\_\_\_ PROJECTED TEST YEAR ENDED \_\_\_/\_\_\_/\_\_\_  
 \_\_\_\_\_ PRIOR YEAR ENDED \_\_\_/\_\_\_/\_\_\_  
 X HISTORICAL TEST YEAR ENDED 12/31/08  
 \_\_\_\_\_ PROJECTED SUBSEQUENT YEAR ENDED \_\_\_/\_\_\_/\_\_\_  
 WITNESS: Kim Ousdahl

DOCKET NO.: 080677-EI

(\$000)

LINE NO.	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
	TOTAL COMPANY PER BOOKS	NON-ELECTRIC UTILITY	TOTAL ELECTRIC (1)-(2)	JURISDICTIONAL FACTOR	JURISDICTIONAL AMOUNT (3)X(4)	JURISDICTIONAL COMMISSION ADJUSTMENTS (SCHEDULE C-2)	JURISDICTIONAL ADJUSTED PER COMMISSION (5)+(6)	JURISDICTIONAL COMPANY ADJUSTMENTS	JURISDICTIONAL ADJUSTED AMOUNT (7) + (8)	
1										
2	REVENUE FROM SALES	11,444,876	0	11,444,876	0.992193	11,355,329	(7,817,507)	3,737,822	0	3,737,822
3										
4	OTHER OPERATING REVENUES	202,115	0	202,115	0.951669	192,346	(16,505)	175,841	0	175,841
5										
6	TOTAL OPERATING REVENUES	11,646,991	0	11,646,991	0.991490	11,547,675	(7,834,012)	3,913,664	0	3,913,664
7										
8	OTHER	1,455,899	0	1,455,899	0.990910	1,442,467	(135,514)	1,306,953	0	1,306,953
9										
10	FUEL & INTERCHANGE	5,676,453	0	5,676,453	0.989137	5,614,791	(5,594,705)	20,086	0	20,086
11										
12	PURCHASED POWER	1,152,234	0	1,152,234	0.988367	1,138,830	(1,075,932)	62,898	0	62,898
13										
14	DEFERRED COSTS	(103,867)	0	(103,867)	1.000226	(103,890)	103,890	0	0	0
15										
16	DEPRECIATION & AMORTIZATION	837,395	0	837,395	0.993965	832,341	(76,061)	756,280	0	756,280
17										
14	TAXES OTHER THAN INCOME TAXES	1,074,663	0	1,074,663	0.998514	1,073,066	(785,255)	287,812	0	287,812
15										
16	INCOME TAXES	454,704	0	454,704	0.997693	453,655	(6,439)	447,216	0	447,216
17										
18	(GAIN)/LOSS ON DISPOSAL OF PLANT	(2,866)	0	(2,866)	0.995676	(2,854)	805	(1,949)	0	(1,949)
15										
16	TOTAL OPERATING EXPENSES	10,544,416	0	10,544,416	0.990895	10,448,406	(7,569,112)	2,879,295	0	2,879,295
17										
18	NET OPERATING INCOME	1,102,375	0	1,102,375	0.997182	1,099,269	(64,900)	1,034,369	0	1,034,369
18										
16										
17										
18										
19										
20	NOTE: TOTALS MAY NOT ADD DUE TO ROUNDING.									

SUPPORTING SCHEDULES: C-2, C-3, C-4

RECAP SCHEDULES: A-1

FLORIDA PUBLIC SERVICE COMMISSION

COMPANY: FLORIDA POWER & LIGHT COMPANY  
AND SUBSIDIARIES

EXPLANATION:  
PROVIDE THE COMPANY'S 13-MONTH AVERAGE  
COST OF CAPITAL FOR THE TEST YEAR, THE PRIOR  
YEAR, AND HISTORICAL BASE YEAR.

TYPE OF DATA SHOWN:

PROJECTED TEST YEAR ENDED 12/31/10  
 PRIOR YEAR ENDED 12/31/09  
 HISTORICAL YEAR ENDED 12/31/08  
 PROJECTED SUBSEQUENT YEAR ENDED 12/31/11

DOCKET NO. 080677-EI

WITNESS: Kim Ousdahl

(000)

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
LINE NO.	CLASS OF CAPITAL	COMPANY TOTAL PER BOOKS	SPECIFIC ADJUSTMENTS	PRO RATA ADJUSTMENTS	SYSTEM ADJUSTED	JURISDICTIONAL FACTOR	JURISDICTIONAL ADJUSTED	RATIO	COST RATE	WEIGHTED COST RATE
1	LONG TERM DEBT	5,883,670	(920,604)	(528,797)	4,434,269	0.993871	4,407,093	29.83%	5.43%	1.62%
2	PREFERRED STOCK					0.000000		0.00%	0.00%	0.00%
3	CUSTOMER DEPOSITS	550,566		(43,645)	508,921	1.000000	508,921	3.43%	5.91%	0.20%
4	COMMON EQUITY	7,628,141	(11,239)	(605,470)	7,011,432	0.993871	6,968,462	47.17%	12.50%	5.90%
5	SHORT TERM DEBT	353,370		(28,013)	325,357	0.993871	323,363	2.19%	2.52%	0.06%
6	DEFERRED INCOME TAX	3,132,202	(302,659)	(288,808)	2,560,735	0.993871	2,545,041	17.23%	0.00%	0.00%
7	INVESTMENT TAX CREDITS	23,075		(1,829)	21,246	0.993871	21,116	0.14%	9.30%	0.01%
8	TOTAL	17,571,024	(1,234,501)	(1,478,563)	14,859,960		14,771,995	100.00%		7.79%
9										
10										
11	NOTE: TOTALS MAY NOT ADD DUE TO ROUNDING									

SUPPORTING SCHEDULES: D-6, D-5, D-4A, D-3, D-1B

RECAP SCHEDULES: A-1