

State of Florida



Public Service Commission
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMAKER BLVD
TALLAHASSEE, FLORIDA 32399-0850

RECEIVED-FPSC

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

DATE: April 9, 2010

TO: Office of Commission Clerk (Cole)

FROM: Division of Economic Regulation (Daniel, Fletcher, Rieger, Stallcup, Williams)
Office of the General Counsel (Jaeger)
Division of Regulatory Analysis (King)
Division of Service, Safety & Consumer Assistance (Hicks)

Handwritten initials: PA, B, SDR, JW, CRB, AM, etc.

RE: Docket No. 080121-WS – Application for increase in water and wastewater rates in Alachua, Brevard, DeSoto, Highlands, Lake, Lee, Marion, Orange, Palm Beach, Pasco, Polk, Putnam, Seminole, Sumter, Volusia, and Washington Counties by Aqua Utilities Florida, Inc.

AGENDA: 04/20/10 – Regular Agenda – Proposed Agency Action - Interested Persons May Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: Edgar

CRITICAL DATES: None

SPECIAL INSTRUCTIONS: None

FILE NAME AND LOCATION: S:\PSC\ECR\WP\080121.RCM.DOC

Case Background

By Order No. PSC-09-0385-FOF-WS (Final Order), issued on May 29, 2009, in this docket, the Commission found that the quality of service provided by Aqua Utilities Florida, Inc. (AUF) was marginal for all systems, except for the Chuluota system, which was unsatisfactory. (Final Order, p. 21) Also, the Commission noted that a consent order for The Woods' water and wastewater systems had just been closed, and made the increased rates for those systems subject to refund with interest should the systems become subject to a Department of Environmental

DOCUMENT NUMBER-DATE

02668 APR-9

FPSC-COMMISSION CLERK

Docket No. 080121-WS

Date: April 9, 2010

Protection (DEP) consent order within 18 months of the issuance of the Final Order. (Final Order, p. 144)

Because of concerns with AUF's customer service, the Commission created an AUF Monitoring Plan which was to last six months. The three major areas of concern targeted in the Monitoring Plan included: (1) AUF's failure to handle customer complaints properly, (2) AUF's Call Center's process for handling complaints, and (3) incorrect meter readings and resulting improper bills. AUF was required to submit monthly reports and sound recordings of customer complaints, as well as meter reading route schedules and meter reading logs, in order to verify the accuracy of the meter readings and resulting customer bills. Upon the completion of these reporting requirements, staff was to present to the Commission its conclusions and recommendations regarding AUF's performance. If it was determined that AUF was not performing adequately, the Commission could initiate show cause proceedings or take such other action as may be deemed appropriate. (Final Order, p. 22)

Staff filed a recommendation for the March 16, 2010, Agenda Conference presenting the results of its review into the quality of service provided by AUF as required by the Final Order. In addition, in its recommendation, staff provided an update of the Utility's compliance with the DEP and County Health Departments which oversee AUF's quality of product and the operational condition of the water and wastewater facilities.

After hearing from staff, parties, and a number of customers at the Agenda Conference, the Commission concluded that, while preliminary results show substantial improvement in AUF's customer service, additional monitoring is required to ultimately render a determination as to the adequacy of AUF's quality of service. The Commission ordered staff to continue monitoring the customer service provided by AUF through calendar year 2010, including customer complaints, meter reading and billing accuracy, and environmental compliance.¹ In preparing a subsequent monitoring plan, the Commission directed staff to emphasize specific areas that were discussed at the Agenda Conference, including the procedures and accuracy of estimated bills, and the appropriate methods and costs to improve the aesthetic quality of water in certain targeted systems. Further, staff was instructed to work collaboratively with AUF and the other parties in order to develop a cost-effective, efficient, and meaningful monitoring plan, and to bring the supplemental monitoring plan to the Commission within 45 days. Staff met in noticed meetings with representatives from AUF, the Office of Public Counsel (OPC), and the Office of the Attorney General (AG) on March 25 and April 5, 2010, to discuss the specifics of a cost-effective monitoring plan consistent with the Commission's direction. In addition, several customer representatives participated in the meetings via conference call. At the April 5th meeting, AUF and OPC agreed to a joint proposed Phase II Monitoring Plan. This memorandum presents staff's recommendation on the AUF/OPC Proposed Phase II Monitoring Plan of AUF's Quality of Service and additional requirements for the Supplemental Monitoring Plan as ordered by the Commission in Order No. PSC-10-0218-PAA-WS, issued April 6, 2010.

The Commission has jurisdiction pursuant to Sections 367.011(2), 367.081, and 367.111, Florida Statutes (F.S.).

¹ See Order No. PSC-10-0218-PAA-WS issued April 6, 2010, in this docket.

Discussion of Issues

Issue 1: Should the Phase II Monitoring Plan proposed by AUF and OPC be approved?

Recommendation: Yes, the plan proposed by AUF and OPC outlines an efficient, cost-effective means of monitoring the quality of service of AUF and should be approved. In addition, staff recommends that the Phase II Monitoring Plan should address environmental compliance and a further evaluation of the customer billing samples. (King, Stallcup, Rieger)

Staff Analysis: As mentioned in the Case Background, at the March 16 Agenda Conference, the Commission concluded that, while preliminary results show substantial improvement in AUF's customer service, additional monitoring is required to ultimately render a determination as to the adequacy of the quality of service. The Commission ordered staff to continue monitoring the customer service provided by AUF through calendar year 2010, and to work collaboratively with AUF and the other parties in order to develop a cost-effective, efficient and meaningful monitoring plan. Staff met with representatives from AUF, OPC, and the AG's Office in noticed meetings on March 25 and April 5, 2010, to discuss the specifics of a cost-effective monitoring plan consistent with the Commission's direction. In addition, several customer representatives participated in the meetings via conference call. At the April 5th meeting, AUF and OPC agreed to a joint proposed Phase II Monitoring Plan. AUF and OPC ultimately submitted their Agreement on Scope of Phase II Monitoring, and that document is appended to this recommendation as Attachment 1.

AUF/OPC PROPOSED PHASE II MONITORING PLAN

In essence, the Phase II Monitoring Plan proposed by AUF and OPC includes monitoring through calendar year 2010 customer complaints, estimated meter readings, and aesthetic water quality for seven of AUF's water systems. The specific methods to accomplish this monitoring are discussed below.

Customer Complaints

With regard to customer complaints, AUF will provide reports and supporting documents on a monthly basis that track the customer calls received by AUF's call centers. (See Nos. 1(a) and (b) and 4 on Attachment 1.) These documents will be provided to all parties in the docket and placed in the Commission's docket file within one month and ten days of the end of the relevant reporting period. For example, reports for the month of May will be filed no later than July 10, 2010. The documents include:

- Management Quality Performance Report – This report tracks on a monthly basis the reasons for customer calls. It is used by AUF management to gain an understanding of recent performance and any adverse trends. AUF has agreed to provide the historical trend line for this report and a monthly "Florida Scorecard," which includes quality of service metrics. In addition, the supporting non-proprietary information for each of the complaint-related calls that underlies the monthly Management Quality Performance Reports will be provided each month.

- Call Center Monitoring Statistics – This report tracks the key performance indicators of its call centers on a monthly basis and is used to ascertain whether AUF is meeting its targeted service performance levels. AUF will also provide the monthly Call Quality Report for all call centers through the end of calendar year 2010 and on a historical basis. This report will be formatted such that monthly data can be tracked for each of the call centers separately. In the initial report, AUF will provide a narrative of its efforts to ensure quality control at its call centers.
- Aged Service Order Status Report – This report tracks AUF's service order log and the timeliness of closing service order requests. This report should address concerns raised by OPC and customers regarding missed commitments.

In addition, in its proposed Phase II Monitoring Plan, AUF agrees to provide an opportunity for an OPC representative to visit one of its call centers and tour the facility.

Staff agrees with AUF and OPC that the data contained in the above-described documents should contain relevant information for all parties to use in evaluating AUF's response to customer complaints. After reviewing these reports, staff and the parties can conduct discovery, if necessary, in order to follow up on questions that may arise or trends that are identified. Further, since these documents are currently being produced for use by AUF management, staff believes this is an efficient and cost-effective means of gathering the necessary monitoring information with regard to customer complaints.

Item No. 2 of the proposed Phase II Monitoring Plan states that the PSC staff will track complaints filed at the Commission by AUF customers. In this regard, staff will produce a monthly report which tracks complaints filed at the Commission Call Center. This report will indicate the number of complaints received for the month, the type of complaint, the dates the complaint was opened and closed, and the county in which the customer resides. Staff will provide this report each month to all parties and place it in the docket file.

During both meetings held with the parties to discuss a subsequent monitoring plan, one of the customers suggested that, in addition to the filing of the above reports, a survey of AUF customers should be conducted in order to determine whether customers' concerns are adequately being addressed by AUF. Staff does not believe another survey would be an effective method of evaluating AUF's efforts to address customer concerns at this time. As noted in the staff recommendation dated March 4, 2010, during the initial monitoring phase, staff sent out a customer satisfaction survey to 900 customers selected at random over a six-month period from the AUF monthly customer complaint logs. After analyzing the responses, reviewing the customer comments, and talking to over 100 customers, staff concluded that the survey did not accurately measure AUF's customer service performance. Rather it appeared that many customers were evaluating AUF's rates, not whether their specific concerns were appropriately addressed. Staff believes the monitoring plan proposed by AUF and agreed to by OPC is a more efficient, cost-effective and focused method to evaluate AUF's performance. As mentioned previously, these monthly reports will provide meaningful data with which to evaluate recent

performance and identify trends. Also, staff and the parties will be able to conduct discovery on the reports to obtain more granular data, if necessary.

Estimated Meter Readings

According to Item No. 1(c) in the proposed Phase II Monitoring Plan, AUF will provide an Estimated Read Report on a monthly basis to the parties and the Commission's docket file. Staff and the parties can use this report to track the number of estimated reads and as a basis to investigate adverse trends. If necessary, the parties or staff can request more detail in order to ascertain the cause of the estimated readings and how it has or will be resolved. Since this is also a report that is currently being produced and used by AUF management, staff believes this is a cost-effective means of monitoring estimated meter readings.

Secondary Drinking Water Standards (Aesthetics)

In Item No. 6 in the proposed Phase II Monitoring Plan, AUF agrees to monitor, on a monthly basis through the end of 2010, the secondary drinking water constituents under the Florida and Federal Safe Drinking Water Acts and report the results. This monitoring will be performed on the following seven water systems:

| <u>Name of System</u> | <u>County</u> | <u>Number of Residential Customers</u> |
|-----------------------|---------------|--|
| Lake Josephine | Highlands | 514 |
| Leisure Lakes | Highlands | 248 |
| Sebring Lakes | Highlands | 66 |
| Rosalie Oaks | Polk | 81 |
| Tangerine | Orange | 236 |
| Tomoka View | Volusia | 258 |
| Zephyr Shores | Pasco | 389 |

AUF chose seven systems to monitor, believing that to be a manageable number of systems to include in the project. The systems were selected based upon the following criteria:

- Review of customer comments at public hearings
- Internal review of number of customer complaints on water quality issues
- Review of water quality data from Secondary Drinking Water test results
- Input from AUF area coordinators on aesthetic water quality issues
- Results of AUF's customer survey

Staff agrees that this is a cost-effective method to study the cause of, and solutions for, aesthetic water quality concerns. Staff has also reviewed the customer testimony from service hearings and other data regarding secondary water quality testing results and believes the seven

systems selected by AUF are appropriate for an initial monitoring project. It is staff's understanding that AUF's efforts to address aesthetic water quality issues are not limited to these seven systems. AUF has also been actively working on improving aesthetics for a number of its systems and has already begun to spend capital dollars associated with those solutions.

Item No. 6 of the proposed Phase II Monitoring Plan also establishes a Joint Secondary Water Quality Task Force, consisting of representatives from AUF, OPC, other parties, and one or two designated customer representatives from each of the seven system locations. There will be two meetings of the task force at each of the seven chosen locations to discuss the aesthetic concerns affecting the system, possible solutions, and associated costs. The monitoring plan also includes a mid-point meeting with the staff, OPC, and the other parties to discuss the results of the aesthetics monitoring and possible solutions.

According to Item No. 7 of the proposed monitoring plan, AUF will submit a report by February 2011, summarizing the results of its Phase II reporting requirements, including a briefing on the results of its meetings with customers in connection with the Joint Secondary Water Quality Task Force. The report will be provided to all parties and staff, and filed in the docket file. Parties will have an opportunity to respond to the AUF report. Staff will subsequently present its conclusions on the results of the Phase II Monitoring Plan along with its recommendations, if any, for further action.

STAFF RECOMMENDED ADDITIONS TO THE PROPOSED PLAN

In addition to the items contained in the AUF/OPC Proposed Phase II Monitoring Plan, staff recommends that the plan address environmental compliance and a further evaluation of the customer billing samples. These two items were specifically discussed by Commissioners at the March 16 Agenda Conference, and staff believes it is appropriate to include them in the Phase II plan. A description of the monitoring effort for these areas of concern follows.

Environmental Compliance

With regard to environmental compliance, staff will obtain and review copies of enforcement actions taken by the DEP, the County Health Departments, and the Water Management Districts (WMDs) through the end of 2010 for each of AUF's water and wastewater systems under the Commission's jurisdiction. As part of the monitoring plan, staff recommends that AUF be required to provide quarterly updates by July 10, 2010, and September 10, 2010, describing the status of all outstanding warning letters, consent orders, and notices of violation. The quarterly updates should include those enforcement actions identified in the Final Order and any additional warning letters, consent orders or notices of violation issued during the period. The reports should further include AUF's plan to resolve each violation. This information should also be provided by AUF as part of its final report on all aspects of the Phase II Monitoring Plan that will be submitted by February 2011.

Meter Reading and Customer Billing Samples

This part of the monitoring plan looks at whether AUF is properly reading customers' meters and whether the bills customers receive reflect the usage indicated by these meter readings. In its initial evaluation, staff randomly sampled 358 meter readings taken by AUF and compared those readings to a corresponding set of meter readings taken by Commission staff. Of these 358 meter readings taken by AUF, none were found to be significantly different from the meter readings taken by staff. Staff therefore recommends that no further testing of AUF's meter reading accuracy is necessary.

Also as part of its initial evaluation, staff randomly sampled 50 customer bills to determine if these bills were properly based upon the meter readings taken by AUF. Although all of the customer bills were appropriately based upon the usage indicated by the meter readings, concern was expressed at the March 16 Agenda Conference that the sample size of 50 may not be sufficient to provide adequate assurance that all customer bills are appropriately based on actual meter readings. Therefore, staff recommends that this sample be expanded to the same sample size of 358 used to determine the adequacy of AUF's meter reading. This will allow a determination to be made of the adequacy of AUF's billing system on the same basis as the aggregate meter reading sample.

Conclusion

As discussed above, the Phase II Monitoring Plan submitted by AUF and OPC outlines an efficient, cost-effective means of monitoring AUF's quality of service. Staff therefore recommends that the plan should be approved. In addition, staff recommends that the Phase II Monitoring Plan address environmental compliance and a further evaluation of the customer billing samples.

Docket No. 080121-WS

Date: April 9, 2010

Issue 2: Should this docket be closed?

Recommendation: No. If no person whose substantial interests are affected by the proposed agency action files a protest within twenty-one days of the issuance of the Order, a Consummating Order will be issued. However, the docket should remain open pending the outcome of the Phase II Monitoring Plan. In addition, the docket should remain open contingent on the DEP not issuing any further consent orders regarding the Woods water and wastewater systems within 18 months of the Final Order, issued on May 29, 2009. (Jaeger)

Staff Analysis: If no person whose substantial interests are affected by the proposed agency action files a protest within twenty-one days of the issuance of the Order, a Consummating Order will be issued. However the docket should remain open pending the outcome of the Phase II Monitoring Plan. In addition, the docket should remain open contingent on the DEP not issuing any further consent orders regarding the Woods water and wastewater systems within 18 months of the Final Order, issued on May 29, 2009. Once the 18-month timeframe has expired without any further DEP consent orders issued regarding the Woods water and wastewater systems, the increased revenue will no longer be subject to refund. However, if new consent order activity for The Woods systems does occur before the 18-month timeframe has expired, staff will report back to the Commission with a recommendation as to how to proceed with the appropriate disposition of the rates made subject to refund.

Aqua Utilities Florida/OPC
Agreement on Scope of Phase II Monitoring

1. Reports to Provide Staff and OPC

Aqua will file the following monthly reports that are utilized by Aqua to track service performance:

a) Management Quality Performance Report (Example attached as Exhibit "A").

This report tracks on a monthly basis the reasons for customer calls. The report provides management an understanding of recent performance and any concerning trends. Variances or changes are reviewed and investigated by management each month. For example, if a month shows elevated "no water" calls, the outage history in that area is investigated. Aqua will provide the historical trend line for this report. Aqua will also provide the supporting non-proprietary information for each of the complaint-related calls that underlies the monthly reports. In addition, Aqua will provide a monthly "Florida Scorecard", which will include quality of service metrics, with the understanding that this "Scorecard" is a work in progress and is used internally by Aqua for evaluating job performance.

b) Call Center Monitoring Statistics Report (Example attached as Exhibit "B").

Using this report, Aqua tracks the key performance indicators of its call centers on a monthly basis. This information is used to ascertain whether Aqua is meeting its targeted service performance levels. Aqua will also provide a monthly CSR Call Quality Report for all call centers through December 31, 2010, and on a historical basis. The CSR Call Quality Report will be formatted such that monthly data can be tracked for each of the calls centers separately, including the Cary, N.C. call center. In its initial report, Aqua will provide a narrative of the company's efforts to ensure quality control at its call centers.

c) Estimated Read Report (Example attached as Exhibit "C").

An estimated read report is circulated and reviewed to track estimated reads on a monthly basis. Estimated reads can occur for varying reasons, *e.g.* weather, malfunction of the meter, etc. Aqua tracks its estimated reads and investigates concerning trends.

- 2. Tracking of PSC complaints will be covered by PSC staff under the Pac's current tracking system.**
- 3. Aqua and OPC agree that the production of sound recordings and meter logs should be eliminated.**
- 4. Aged Service Order Status Report** (Example attached as Exhibit "D").

In order to address the OPC's concern regarding "missed commitments" Aqua will file its monthly Aged Service Order Status Reports for all customer initiated calls. This report is utilized by management to track AUF's service order log and the timeliness of closing of service order requests. This report includes, for example, service orders related to water quality service, no water reports, and requests to fix a broken meter.

5. **In order to better apprise the OPC of Aqua's commitment to quality of service, during the Phase II Monitoring, Aqua will provide for an OPC representative to visit one of its call centers and tour the facility.**

6. **Establish Joint Secondary Water Quality Task Force**
 - Monitoring Aesthetics. AUF will agree to monitor on a monthly basis through December 31, 2010 secondary constituents under the Florida and Federal Safe Drinking Water Acts, and report the results. Monitoring will be performed on seven of AUF's systems: Tangerine, Zephyr Shores, Tomoka, Leisure Lakes, Lake Josephine, Rosalie Oaks and Sebring Lakes. AUF identified these 7 systems utilizing the following criteria:
 - Review of comments from customers at public hearing
 - Internal review of number of customer inquiries dealing with water quality issues
 - Review of water quality data on Secondary Water Quality results
 - Information from Area Coordinators on aesthetic issues they deal with in their systems
 - Survey results from customers

 - Meetings with OPC, parties and Designated Customer Representatives (14 in Total)
 - First Meeting: By the end of Month 2 of the monitoring program, AUF will meet with OPC, parties and 1 or 2 designated customer representatives at each of the 7 system locations to constructively discuss the aesthetic concern effecting the system and possible solutions to the aesthetic concern
 - Second Meeting: By end of Month 4, AUF will have follow-up meetings with those participating in the First Meeting to continue to discuss aesthetic concerns and focus more on possible solutions and associated costs

 - Mid-Point Meeting with FPSC Staff
 - By the end of Month 3, AUF will meet with staff (and OPC and the other parties) in Tallahassee to discuss the results of aesthetics monitoring and possible solutions to aesthetic concerns

7. Annual Report by Aqua to the Commission

Aqua will submit a report by February 2011 summarizing the results of its Phase II reporting requirements, which will include a briefing on the results of its meetings with customers in connection with the Joint Secondary Water Quality Task Force.

- 8. During Phase II Monitoring, Aqua will file copies of the reports within 1 month and 10 days of the end of the relevant period.** For example, reports for the month of May will be filed not later than July 10, 2010.
- 9. The Commission will decide whether the docket should be closed after reviewing all of the data submitted during the Phase II Monitoring process.**

QUALITY PERFORMANCE REPORT

Florida Customers

| Feb-10 | | Percent | Total Calls |
|--------------------|-----------------------------|-------------|--------------|
| 1 | Move In or Move Out | 20% | 899 |
| 2 | Pay by Phone - Speedpay | 15% | 679 |
| 3 | Verify Account Balance | 11% | 490 |
| 4 | Restore Service | 6% | 283 |
| 5 | Customer Account Changes | 6% | 273 |
| 6 | Explain Bill | 5% | 220 |
| 7 | Payment Confirmation Number | 5% | 200 |
| 8 | Verify Receipt of Payment | 4% | 176 |
| 9 | Payment Arrangement | 4% | 176 |
| 10 | Shut-Off Notice | 4% | 157 |
| | All Other Calls | 19% | 845 |
| Total calls | | 100% | 4,398 |

Exhibit A

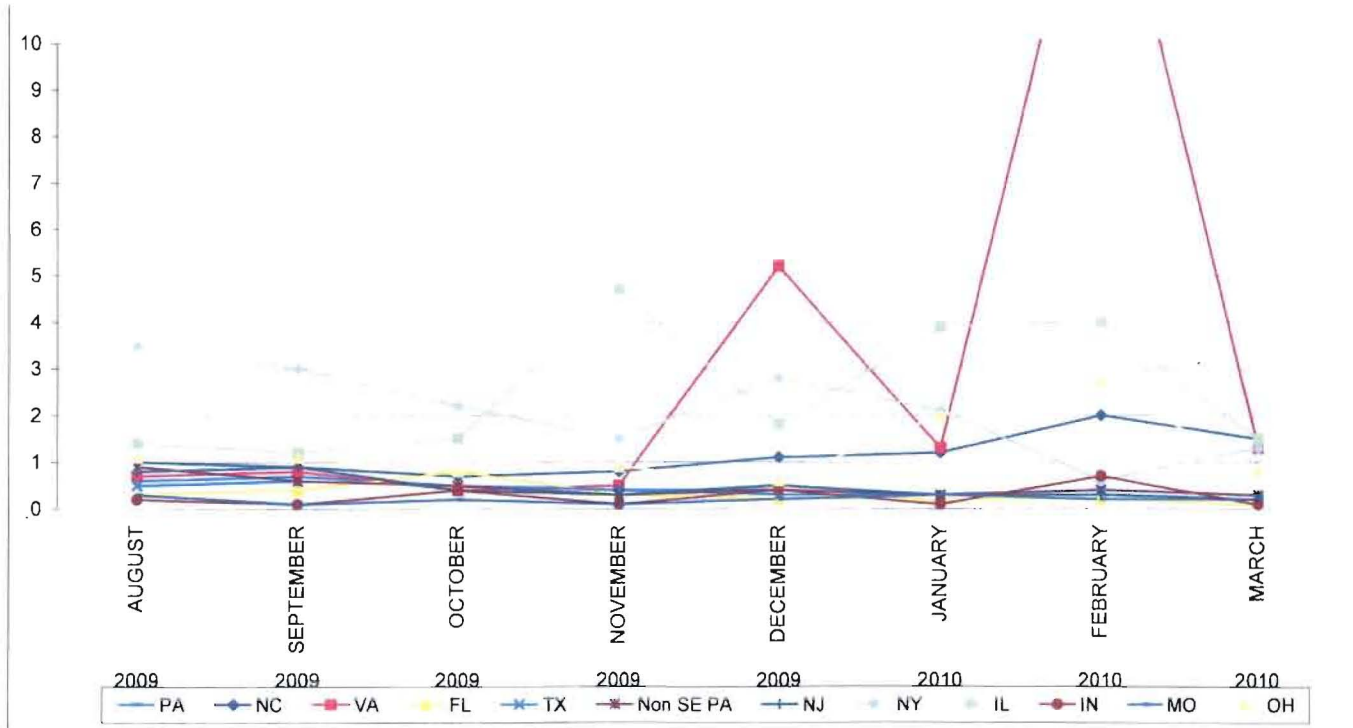
| Call Center Statistics | October-09 | November-09 | December-09 | Standard / Goal |
|--------------------------------|------------|-------------|-------------|-----------------|
| Customers (approx.) | 858,041 | 858,041 | 858,041 | |
| Total Calls | 89,915 | 81,148 | 82,417 | |
| Days Open | 22 | 19 | 22 | |
| Average Calls/Day | 4,087 | 4,271 | 3,746 | |
| Abandon Rate | 3.5% | 4.8% | 3.1% | < 5 % |
| Calls Answered in < 90 seconds | 85% | 81% | 86% | > 80 % |
| Average Speed to Answer | 36 sec | 51 sec | 33 sec | < 60 sec |
| Average Handle Time | 4:46 | 4:43 | 4:34 | < 4:30 |
| Calls/Customer/Yr | 1.2 | 1.2 | 1.1 | ~ 1.0 |
| Average #CSR/Day | 64.0 | 64.9 | 64.2 | |
| Calls Answered | 86,768 | 77,253 | 79,862 | |

Exhibit B

ESTIMATION RATE BY STATE

| Year | Month | PA | NC | VA | FL | TX | Non SE PA | NJ | NY | IL | IN | MO | OH |
|------|-----------|-----|-----|------|-----|-----|-----------|-----|-----|-----|-----|-----|-----|
| 2009 | AUGUST | 0.6 | 1 | 0.7 | 0.3 | 0.5 | 0.9 | 0.8 | 3.5 | 1.4 | 0.2 | 0.3 | 1.1 |
| 2009 | SEPTEMBER | 0.7 | 0.9 | 0.8 | 0.4 | 0.6 | 0.6 | 0.9 | 3 | 1.2 | 0.1 | 0.1 | 1.1 |
| 2009 | OCTOBER | 0.5 | 0.7 | 0.4 | 0.8 | 0.5 | 0.5 | 0.4 | 2.2 | 1.5 | 0.4 | 0.2 | 0.8 |
| 2009 | NOVEMBER | 0.4 | 0.8 | 0.5 | 0.3 | 0.4 | 0.3 | 0.3 | 1.5 | 4.7 | 0.1 | 0.1 | 0.9 |
| 2009 | DECEMBER | 0.4 | 1.1 | 5.2 | 0.2 | 0.3 | 0.4 | 0.5 | 2.8 | 1.8 | 0.4 | 0.2 | 0.6 |
| 2010 | JANUARY | 0.3 | 1.2 | 1.3 | 0.2 | 0.3 | 0.3 | 0.3 | 2.1 | 3.9 | 0.1 | 0.3 | 2 |
| 2010 | FEBRUARY | 0.4 | 2 | 15.4 | 0.2 | 0.4 | 0.4 | 0.3 | 0.6 | 4 | 0.7 | 0.2 | 2.7 |
| 2010 | MARCH | 0.3 | 1.5 | 1.3 | 0.1 | 0.3 | 0.3 | 0.2 | 1.3 | 1.5 | 0.1 | 0.2 | 0.8 |

Exhibit C



Aqua America Aged Service Orders
Florida
Status: O - Needs to be Worked in the Field
Run Date: 4/1/10

| CODE | 1-7 | 8-14 | 15-21 | 22-28 | 29-60 | 61-90 | 91-120 | 121-200 | 201-300 | 301-400 | >400 | TOTAL |
|-------|-----|------|-------|-------|-------|-------|--------|---------|---------|---------|------|-------|
| HIC | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| LABT | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| MSMT | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 2 |
| PRES | 4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 4 |
| RMTR | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 |
| TOTAL | 8 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 9 |

Exhibit D