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April 28, 2010

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COMMISSION
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VIA HAND DELIVERY

Ms. Ann Cole
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

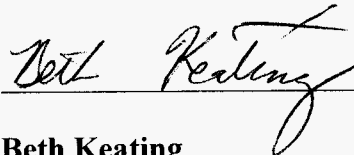
Re: Docket No. 100004-GU – Natural Gas Conservation Cost Recovery Clause.

Dear Ms. Cole:

Enclosed for filing in the above referenced Docket, please find an original and 15 copies of Florida City Gas's Petition and the Direct Testimony and Exhibit of Ms. Carolyn Bermudez.

Your assistance in this matter is greatly appreciated.

Sincerely,



Beth Keating
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877
Phone: (850) 224-9634
Fax: (850) 222-0103

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Enclosures

DOCUMENT NUMBER-DATE

03421 APR 28 09

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost Recovery)
Clause)
_____)

DOCKET NO. 100004-GU
Filed: April 28, 2010

**PETITION OF
FLORIDA CITY GAS
FOR APPROVAL OF TRUE-UP**

Florida City Gas hereby petitions the Commission for Approval of the Company's conservation cost recovery true-up for the months January 2009 through December 2009.

In support thereof, the Company says:

1. The final true-up amount (Adjusted Net True-Up) for the months January 2009 through December 2009, is an under-recovery of \$116,747, including interest.
2. The Company's calculation of the true-up amount is consistent with the Commission's methodology, and supported by the Direct Testimony of Carolyn Bermudez and Schedules CT-1, CT-2 and CT-3.

WHEREFORE, Florida City Gas requests that its true-up for the months January 2009 through December 2009, be approved.



Akerman Senterfitt Attorneys at Law
106 East College Avenue
Highpoint Center, 12th Floor
Tallahassee, FL 32301
(850)224-9634

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Petition of Florida City Gas supported by the Direct Testimony and Exhibits of Carolyn Bermudez, has been furnished by U.S. Mail to the following parties of record.

Florida Public Utilities Company Cheryl Martin P.O. Box 3395 West Palm Beach, FL 33402-3395	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Messer Law Firm Norman H. Horton, Jr. P.O. Box 15579 Tallahassee, FL 32317	Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Peoples Gas System Paula Brown P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Matthew Costa P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade/David Weaver Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Melvin Williams 933 East 25 th Street Hialeah, FL 33013-3498	Katherine Fleming Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Florida Division of Chesapeake Utilities Corporation Thomas A. Geoffroy P.O. Box 960 Winter Haven, FL 33882-0960	Indiantown Gas Company Brian J. Powers P.O. Box 8 Indiantown, FL 34956-0008
Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870	Robert Scheffel Wright/ John T. LaVia 225 South Adams Street, Suit 200 Tallahassee, FL 32301



Beth Keating
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Highpoint Center, 12th Floor
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(850)224-9634

1 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

2 DIRECT TESTIMONY OF CAROLYN BERMUDEZ

3 ON BEHALF OF

4 FLORIDA CITY GAS

5 DOCKET NO. 100004-GU

6 April 28, 2010

7
8 **Q. Please state your name, business address, by whom you are**
9 **employed, and in what capacity.**

10
11 A. My name is Carolyn Bermudez and my business address is 933 East 25th
12 Street, Hialeah, Florida 33013-3498. I am employed by Florida City Gas as
13 Director, Strategic Business & Financial Planning.

14
15 **Q. Are you familiar with the energy conservation programs of Florida**
16 **City Gas?**

17
18 A. Yes, I am.

19
20 **Q. Are you familiar with the costs that have been incurred and that are**
21 **projected to be incurred by Florida City Gas in implementing its**
22 **energy conservation programs?**

23
24 A. Yes, I am.

25
DOCUMENT NUMBER-DATE

03421 APR 28 09

FPSC-COMMISSION CLERK

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Q. What is the purpose of your testimony in this docket?

A. To submit the recoverable costs incurred during the period ending December 31, 2009, and to identify the final true-up amount related to that period.

Q. Has Florida City Gas prepared schedules which show the expenditures associated with its energy conservation programs for the period you have mentioned?

A. Yes. I have prepared and filed together with this testimony Exhibit CB-1 consisting of Schedules CT-1, CT-2 and CT-3.

Q. What amount did Florida City Gas spend on conservation programs during this period?

A. \$2,254,121.

Q. What is the final true-up amount associated with the period ending December 31, 2009?

A. An under-recovery of \$116,747.

Q. Does this conclude your testimony?

A. Yes, it does.

ADJUSTED NET TRUE UP
JANUARY 2009 THROUGH DECEMBER 2009

END OF PERIOD NET TRUE-UP

PRINCIPLE	164,167	
INTEREST	1,877	166,044

LESS PROJECTED TRUE-UP

PRINCIPLE	47,466	
INTEREST	1,831	49,297

ADJUSTED NET TRUE-UP **116,747**

() REFLECTS OVER-RECOVERY

ANALYSIS OF ENERGY CONSERVATION PROGRAM COSTS
ACTUAL VERSUS ESTIMATED
JANUARY 2009 THROUGH DECEMBER 2009

	<u>ACTUAL</u>	<u>PROJECTED ***</u>	<u>DIFFERENCE</u>
CAPITAL INVESTMENT	-		-
PAYROLL & BENEFITS	582,359	686,948	(104,589)
MATERIALS & SUPPLIES	-	6,342	(6,342)
ADVERTISING	414,021	479,999	(65,978)
INCENTIVES	1,189,745	1,012,161	177,584
OUTSIDE SERVICES	22,129	-	22,129
VEHICLES	45,867	50,354	(4,487)
OTHER	<u>-</u>	<u>-</u>	<u>-</u>
SUB-TOTAL	2,254,121	2,235,804	18,317
PROGRAM REVENUES	<u>-</u>	<u>-</u>	<u>-</u>
TOTAL PROGRAM COSTS	2,254,121	2,235,804	18,317
LESS:			
PAYROLL ADJUSTMENTS	-	-	-
AMOUNTS INCLUDED IN RATE BASE	-	-	-
CONSERVATION ADJUSTMENT REVENUES	(2,089,954)	(2,188,338)	98,384
ROUNDING ADJUSTMENT	<u>-</u>	<u>-</u>	<u>-</u>
TRUE-UP BEFORE INTEREST	164,167	47,466	116,701
INTEREST PROVISION	1,877	1,831	46
END OF PERIOD TRUE-UP	<u>166,044</u>	<u>49,297</u>	<u>116,747</u>

() REFLECTS OVER-RECOVERY

*** Seven months actual and four months projected (Jan-Dec'2009)

ACTUAL CONSERVATION PROGRAM COSTS PER PROGRAM
JANUARY 2009 THROUGH DECEMBER 2009

PROGRAM NAME	CAPITAL	PAYROLL & MATERIALS	OUTSIDE			VEHICLE	OTHER	TOTAL	
	INVESTMENT	BENEFITS & SUPPLIES	ADVERTISING	INCENTIVES	SERVICES				
PROGRAM 1: SINGLE FAMILY HOME BUILDER	-	96,727	-	-	51,356	-	6,362	-	154,445
PROGRAM 2: MULTI FAMILY HOME BUILDER	-	-	-	-	-	-	-	-	-
PROGRAM 3: ELECTRIC REPLACEMENT	-	119,998	-	378,626	109,553	21,057	9,893	-	639,127
PROGRAM 4: DEALER PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 5: SCHOOLS PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 6: PROPANE CONVERSION	-	-	-	-	139	-	-	-	139
PROGRAM 7: WATER HEATER RETENTION	-	51,005	-	-	902,483	-	-	-	953,488
PROGRAM 8: RESIDENTIAL CUT AND CAP	-	36,394	-	-	239	-	-	-	36,633
PROGRAM 9: COMM/IND CONVERSION	-	206,171	-	-	125,975	-	22,607	-	354,753
PROGRAM 10: ALTERNATIVE TECHNOLOGY	-	17,694	-	-	-	-	2,823	-	20,517
COMMON COSTS	-	54,370	-	35,395	-	1,072	4,182	-	95,019
TOTAL TOTAL OF ALL PROGRAMS	-	582,359	-	414,021	1,189,745	22,129	45,867	-	2,254,121

399,683
(21,056)
12,500
22,895
414,022

2,057
2,091,013
163,108
2,254,121

CITY GAS COMPANY OF FLORIDA
PROJECTED CONSERVATION COSTS PER PROGRAM
JANUARY 2009 THROUGH DECEMBER 2009
SEVEN MONTHS ACTUAL AND FOUR MONTHS ESTIMATED

PROGRAM NAME	CAPITAL INVESTMENT	PAYROLL & BENEFITS	MATERIALS & SUPPLIES	ADVERTISING	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
PROGRAM 1: SINGLE FAMILY HOME BUILDE	-	98,869	-	-	126,202	-	7,228	-	232,299
PROGRAM 2: MULTI FAMILY HOME BUILDER	-	-	-	-	-	-	-	-	-
PROGRAM 3: ELECTRIC REPLACEMENT	-	121,099	-	454,795	94,741	-	10,065	-	680,700
PROGRAM 4: DEALER PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 5: SCHOOLS PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 6: PROPANE CONVERSION	-	-	-	-	530	-	-	-	530
PROGRAM 7: WATER HEATER RETENTION	-	70,062	-	-	719,020	-	-	-	789,082
PROGRAM 8: RESIDENTIAL CUT AND CAP	-	34,064	-	-	-	-	-	-	34,064
PROGRAM 9: COMM/IND CONVERSION	-	270,121	-	-	71,668	-	27,845	-	369,634
PROGRAM 10: ALTERNATIVE TECHNOLOGY	-	40,624	-	-	-	-	2,652	-	43,276
COMMON COSTS	-	52,109	6,342	25,204	-	-	2,564	-	86,219
TOTAL	TOTAL OF ALL PROGRAMS	686,948	6,342	479,999	1,012,161	-	50,354	-	2,235,804

CONSERVATION COSTS PER PROGRAM - VARIANCE ACTUAL VERSUS PROJECTED
JANUARY 2009 THROUGH DECEMBER 2009

PROGRAM NAME	CAPITAL	PAYROLL & MATERIALS	OUTSIDE				TOTAL		
	INVESTMENT	BENEFITS & SUPPLIES	ADVERTISING	INCENTIVES	SERVICES	VEHICLE		OTHER	
PROGRAM 1: SINGLE FAMILY HOME BUILDER	-	(2,142)	-	-	(74,846)	-	(866)	-	(77,854)
PROGRAM 2: MULTI FAMILY HOME BUILDER	-	-	-	-	-	-	-	-	-
PROGRAM 3: ELECTRIC REPLACEMENT	-	(1,101)	-	(76,169)	14,812	21,057	(172)	-	(41,573)
PROGRAM 4: DEALER PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 5: SCHOOLS PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 6: PROPANE CONVERSION	-	-	-	-	(391)	-	-	-	(391)
PROGRAM 7: WATER HEATER RETENTION	-	(19,057)	-	-	183,463	-	-	-	164,406
PROGRAM 8: RESIDENTIAL CUT AND CAP	-	2,330	-	-	239	-	-	-	2,569
PROGRAM 9: COMM/IND CONVERSION	-	(63,950)	-	-	54,307	-	(5,238)	-	(14,881)
PROGRAM 10: ALTERNATIVE TECHNOLOGY	-	(22,930)	-	-	-	-	171	-	(22,759)
COMMON COSTS	-	2,261	(6,342)	10,191	-	1,072	1,618	-	8,800
TOTAL TOTAL OF ALL PROGRAMS	-	(104,589)	(6,342)	(65,978)	177,584	22,129	(4,487)	-	18,317

() REFLECTS PROJECTED OVER ACTUAL EXPENSE ESTIMATES

ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION
SUMMARY OF EXPENSES BY MONTH
JANUARY 2009 THROUGH DECEMBER 2009

EXPENSES:	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total	
PROGRAM 1:	12,622	8,165	14,557	12,344	18,598	17,224	11,890	10,345	11,673	17,725	9,978	9,324	154,445	-
PROGRAM 2:	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 3:	18,331	44,074	59,207	47,639	31,994	47,129	42,299	28,108	57,656	48,235	25,228	189,227	639,127	-
PROGRAM 4:	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 5:	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 6:	-	-	-	-	-	-	-	-	-	-	139	-	139	-
PROGRAM 7:	75,182	65,653	67,401	73,451	62,366	77,666	54,866	102,342	24,195	156,313	87,387	106,666	953,488	-
PROGRAM 8:	-	1,411	2,644	11,660	6,990	5,534	5,825	5,132	(2,563)	-	-	-	36,633	-
PROGRAM 9:	22,348	31,016	36,698	28,948	28,092	24,671	22,893	26,206	47,823	31,637	19,316	35,105	354,753	-
PROGRAM 10:	3,451	4,183	3,152	5,396	2,279	607	113	232	314	142	227	421	20,517	-
COMMON COSTS	18,848	19,538	18,239	20,777	16,779	14,567	20,496	(3,147)	(117)	(9,579)	(269)	(21,113)	95,019	-
TOTAL	150,782	174,040	201,898	200,215	167,098	187,398	158,382	169,218	138,981	244,473	142,006	319,630	2,254,121	
LESS: Audit Adjustments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
RECOVERABLE CONSERVATION EXPENSES	150,782	174,040	201,898	200,215	167,098	187,398	158,382	169,218	138,981	244,473	142,006	319,630	2,254,121	

SCHEDULE CT-2
PROJECTED CONSERVATION COSTS PER MONTH
JANUARY 2009 THROUGH DECEMBER 2009
SEVEN MONTHS ACTUAL AND FOUR MONTHS ESTIMATED

EXPENSES:

	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total
PROGRAM 1:	12,602	8,161	14,547	12,332	18,575	17,196	11,874	27,402	27,402	27,402	27,402	27,402	232,297
PROGRAM 2:	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 3:	18,288	44,057	59,158	47,593	31,975	47,098	42,280	78,050	78,050	78,050	78,050	78,050	680,699
PROGRAM 4:	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 5:	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 6:	-	-	-	-	-	-	-	106	106	106	106	106	530
PROGRAM 7:	74,926	65,383	67,129	73,196	62,133	77,404	54,670	62,848	62,848	62,848	62,848	62,848	789,081
PROGRAM 8:	-	1,411	2,644	11,660	6,990	5,534	5,825	-	-	-	-	-	34,064
PROGRAM 9:	22,333	31,006	36,677	28,939	28,083	24,658	22,879	35,012	35,012	35,012	35,012	35,012	369,635
PROGRAM 10:	3,451	4,183	3,152	5,396	2,279	607	113	4,819	4,819	4,819	4,819	4,819	43,276
COMMON COSTS	5,548	5,975	5,784	7,534	6,514	5,317	9,373	8,035	8,035	8,035	8,035	8,037	86,222
TOTAL	137,148	160,176	189,091	186,650	156,549	177,814	147,014	216,272	216,272	216,272	216,272	216,274	2,235,804
LESS AMOUNT INCLUDED IN RATE BASE	-	-	-	-	-	-	-	-	-	-	-	-	-
RECOVERABLE													
CONSERVATION EXPENSES	137,148	160,176	189,091	186,650	156,549	177,814	147,014	216,272	216,272	216,272	216,272	216,274	2,235,804

SCHEDULE CT-2
SUMMARY OF EXPENSES BY PROGRAM
VARIANCE ACTUAL VERSUS PROJECTED
JANUARY 2009 THROUGH DECEMBER 2009

EXPENSES:	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total
PROGRAM 1:	20	4	10	12	23	28	16	(17,057)	(15,729)	(9,677)	(17,424)	(18,078)	(77,852)
PROGRAM 2:	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 3:	43	17	49	46	19	31	19	(49,942)	(20,394)	(29,815)	(52,822)	111,177	(41,572)
PROGRAM 4:	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 5:	-	-	-	-	-	-	-	-	-	-	-	-	-
PROGRAM 6:	-	-	-	-	-	-	-	(106)	(106)	(106)	33	(106)	(391)
PROGRAM 7:	256	270	272	255	233	262	196	39,494	(38,653)	93,465	24,539	43,818	164,407
PROGRAM 8:	-	-	-	-	-	-	-	5,132	(2,563)	-	-	-	2,569
PROGRAM 9:	15	10	21	9	9	13	14	(8,806)	12,811	(3,375)	(15,696)	93	(14,882)
PROGRAM 10:	-	-	-	-	-	-	-	(4,587)	(4,505)	(4,677)	(4,592)	(4,398)	(22,759)
COMMON COSTS	13,300	13,563	12,455	13,243	10,265	9,250	11,123	(11,182)	(8,152)	(17,614)	(8,304)	(29,150)	8,797
TOTAL	13,634	13,864	12,807	13,565	10,549	9,584	11,368	(47,054)	(77,291)	28,201	(74,266)	103,356	18,317
LESS: 2008 Audit Adjustments:	-	-	-	-	-	-	-	-	-	-	-	-	-
RECOVERABLE CONSERVATION EXPENSES	13,634	13,864	12,807	13,565	10,549	9,584	11,368	(47,054)	(77,291)	28,201	(74,266)	103,356	18,317

ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION
JANUARY 2009 THROUGH DECEMBER 2009

	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total
1 RCS AUDIT FEES	-	-	-	-	-	-	-	-	-	-	-	-	-
2 OTHER PROGRAM REVS	-	-	-	-	-	-	-	-	-	-	-	-	-
3 CONSERV. ADJ REVS	(298,478)	(365,128)	(307,535)	(257,749)	(242,618)	(226,408)	(219,264)	(208,070)	(211,534)	(210,383)	(227,797)	(255,028)	(3,029,992)
4 TOTAL REVENUES	(298,478)	(365,128)	(307,535)	(257,749)	(242,618)	(226,408)	(219,264)	(208,070)	(211,534)	(210,383)	(227,797)	(255,028)	(3,029,992)
5 PRIOR PERIOD TRUE UP NOT APPLICABLE TO THIS PERIOD	78,337	78,337	78,337	78,337	78,337	78,337	78,337	78,337	78,337	78,335	78,335	78,335	940,038
6 CONSERVATION REVENUES APPLICABLE TO THE PERIOD	(220,141)	(286,791)	(229,198)	(179,412)	(164,281)	(148,071)	(140,927)	(129,733)	(133,197)	(132,048)	(149,462)	(176,693)	(2,089,954)
7 CONSERVATION EXPENSES (FROM CT-3, PAGE 1)	150,782	174,040	201,898	200,215	167,098	187,398	158,382	169,218	138,981	244,473	142,006	319,630	2,254,121
8 TRUE-UP THIS PERIOD	(69,359)	(112,751)	(27,300)	20,803	2,817	39,327	17,455	39,485	5,784	112,425	(7,456)	142,937	164,167
9 INTEREST PROVISION THIS PERIOD (FROM CT-3 PAGE 3)	480	447	298	185	117	93	80	56	39	33	25	22	1,877
10 TRUE-UP & INTER. PROV. BEGINNING OF MONTH	940,038	792,822	602,181	496,842	439,493	364,090	325,174	264,372	225,576	153,062	187,185	101,420	
11 PRIOR PERIOD TRUE UP													
COLLECTED/(REFUNDED)	(78,337)	(78,337)	(78,337)	(78,337)	(78,337)	(78,337)	(78,337)	(78,337)	(78,337)	(78,335)	(78,335)	(78,335)	
12 TOTAL NET TRUE UP (SUM LINES 8+9+10+11)	792,822	602,181	496,842	439,493	364,090	325,174	264,372	225,576	153,062	187,185	101,420	166,044	166,044

CALCULATION OF TRUE-UP AND INTEREST PROVISION
JANUARY 2009 THROUGH DECEMBER 2009

INTEREST PROVISION	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Total
1. BEGINNING TRUE-UP	940,038	792,822	602,181	496,842	439,493	364,090	325,174	264,372	225,576	153,062	187,185	101,420	
2. ENDING TRUE-UP BEFORE INTEREST	792,342	601,734	496,544	439,308	363,973	325,080	264,292	225,520	153,023	187,152	101,394	166,022	
3. TOTAL BEGINNING & ENDING TRUE-UP	1,732,380	1,394,556	1,098,726	936,150	803,467	689,171	589,466	489,891	378,598	340,214	288,580	267,441	
4. AVERAGE TRUE-UP (LINE 3 TIMES 50%)	866,190	697,278	549,363	468,075	401,733	344,585	294,733	244,946	189,299	170,107	144,290	133,721	
5. INTER. RATE - 1ST DAY OF REPORTING MONTH	0.540%	0.790%	0.750%	0.550%	0.400%	0.300%	0.350%	0.300%	0.250%	0.250%	0.220%	0.200%	
6. INTER. RATE - 1ST DAY OF SUBSEQUENT MONTH	0.790%	0.750%	0.550%	0.400%	0.300%	0.350%	0.300%	0.250%	0.250%	0.220%	0.200%	0.200%	
7. TOTAL (SUM LINES 5 & 6)	1.330%	1.540%	1.300%	0.950%	0.700%	0.650%	0.650%	0.550%	0.500%	0.470%	0.420%	0.400%	
8. AVG INTEREST RATE (LINE 7 TIMES 50%)	0.665%	0.770%	0.650%	0.475%	0.350%	0.325%	0.325%	0.275%	0.250%	0.235%	0.210%	0.200%	
9. MONTHLY AVG INTEREST RATE	0.055%	0.064%	0.054%	0.040%	0.029%	0.027%	0.027%	0.023%	0.021%	0.020%	0.018%	0.017%	
10. INTEREST PROVISION (LINE 4 TIMES LINE 9)	480	447	298	185	117	93	80	56	39	33	25	22	1,877
10. a. INT. ADJ													