

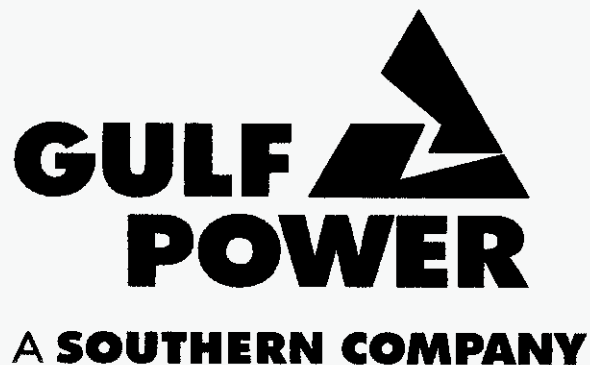
**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 110138-EI**

**REBUTTAL TESTIMONY AND EXHIBIT**

**OF**

**RICHARD J. MCMILLAN**



DOCUMENT NUMBER-DATE

08161 NOV-4 =

FPSC-COMMISSION CLERK

1 GULF POWER COMPANY

2 Before the Florida Public Service Commission  
3 Rebuttal Testimony and Exhibit of  
4 Richard J. McMillan  
5 Docket No. 110138-EI  
6 In Support of Rate Relief  
7 Date of Filing: November 4, 2011

8 Q. Please state your name, business address and occupation.

9 A. My name is Richard J. McMillan. My business address is One Energy  
10 Place, Pensacola, Florida 32520 and I am Gulf Power Company's (Gulf or  
11 the Company) Corporate Planning Manager.

12 Q. Did you file direct testimony in this docket?

13 A. Yes.

14 Q. What is the purpose of your rebuttal testimony?

15 A. The purpose of my rebuttal testimony is to demonstrate that the cost  
16 allocations to Gulf from Southern Company Services (SCS) are based on  
17 appropriate cost allocation methodologies and that the recommended  
18 changes to some of those allocation factors by Office of Public Counsel  
19 (OPC) witness Dismukes are without merit. I also show why the Florida  
20 Public Service Commission (FPSC or the Commission) should reject her  
21 proposal to disallow the costs associated with a number of specific work  
22 orders. In addition, I show that the calculation of her proposed adjustment  
23 related to Gulf's non-regulated operations is in error and that her  
24 recommendation to move the accounting for such operations above-the-  
25 line should be rejected.

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1 Next I respond to the proposals by Federal Executive Agencies (FEA)  
2 witness Meyer and OPC witness Ramas to disallow a portion of Gulf's  
3 payroll costs related to employee vacancies or hiring lag. I show that  
4 labor costs cannot be viewed in isolation, and that Gulf's total level of  
5 Operations and Maintenance (O&M) expense is reasonable even if some  
6 vacancies exist during the year. I also show that the amounts these  
7 witnesses propose to disallow are significantly greater than any properly  
8 calculated hiring lag adjustment.

9  
10 With regard to Gulf's proposal to include its North Escambia County  
11 generating site in rate base, I clarify an apparent misunderstanding by  
12 various intervenor witnesses about the role that Florida Statutes Section  
13 366.93 plays in Gulf's request.

14  
15 I also show that if the Commission decides to make a parent debt  
16 adjustment, the jurisdictional amount calculated by Ms. Ramas uses an  
17 inappropriate jurisdictional factor that overstates the amount of the  
18 adjustment.

19  
20 Finally, I respond to a number of miscellaneous issues raised by  
21 intervenor witnesses, including Gulf's cost of debt and preference stock,  
22 the correct balance of deferred taxes to be included in the capital  
23 structure, the correct amount of test year revenues from Sales for Resale,  
24 and the reasons that unamortized rate case expense should be included

25

1 in working capital. I also comment on a lack of consistency in the basis  
2 used by OPC witness Schultz for his proposed expense adjustments.

3  
4 Q. Are you sponsoring any rebuttal exhibits?

5 A. Yes. I am sponsoring Exhibit RJM-2, Schedules 1 through 6. Exhibit  
6 RJM-2 was prepared under my supervision and direction, and the  
7 information contained in that exhibit is true and correct to the best of my  
8 knowledge and belief.

9

10

11 **I. TRANSACTIONS WITH AFFILIATES**

12

13 Standards for Cost Allocations

14 Q. Ms. Dismukes states that subsection (3) of Commission Rule 25-6.1351,  
15 Florida Administrative Code, provides specific details about the pricing  
16 criteria to be used for transactions between affiliates and a regulated  
17 utility. How does that rule apply to transactions between SCS and Gulf  
18 Power?

19 A. That rule does not apply to services provided by SCS to Gulf Power. Rule  
20 25-6.1351(3)(a) specifically states that subsection (3) – which  
21 Ms. Dismukes purports to summarize – does *not* apply to services  
22 received by a utility from an affiliate, such as SCS, that exists solely to  
23 provide services to members of the utility's corporate family. The rule also  
24 does not apply to services provided between Gulf and any of its regulated  
25 utility affiliates, such as Alabama Power or Mississippi Power. Further, the

1 provisions in subsection (3)(d) relating to asset transfers apply only to  
2 transfers between Gulf and its nonregulated affiliates, not to transfers  
3 between Gulf and its regulated utility affiliates.  
4

5 Q. Ms. Dismukes refers to an April 9, 2001 letter from NARUC to the  
6 Securities and Exchange Commission (SEC) regarding NARUC's  
7 Guidelines for Cost Allocations and Affiliate Transactions. Have you  
8 reviewed that letter and the attached guidelines?

9 A. Yes. This letter was written in the context of an SEC rulemaking that  
10 would govern cost allocations between a U.S. public utility holding  
11 company and a foreign affiliate of the holding company. Thus the letter  
12 has no applicability to Gulf and its affiliates.  
13

14 The 1999 NARUC Cost Allocation Guidelines attached to the letter  
15 specifically state that they "are not intended to be rules or regulations  
16 prescribing how cost allocations and affiliate transactions are to be  
17 handled." Instead they were intended to provide a framework for  
18 regulatory authorities to consider "in the development of their own policies  
19 and procedures for cost allocations and affiliated transactions."  
20

21 Ms. Dismukes fails to point out that this Commission's own policies and  
22 procedures for cost allocations and affiliate transactions, which are  
23 contained in Rule 25-6.1351, were adopted in late 2000, after these  
24 NARUC guidelines had been issued. Gulf is governed by the  
25 Commission's rules, not by the earlier NARUC Guidelines.

1

2 Q. Ms. Dismukes also states that the Cost Accounting Standards Board  
3 (CASB) has issued standards relating to the allocation of costs to affiliates  
4 and cites it as an authoritative source which recognizes the importance of  
5 benefits in distributing common costs. Do you have any observations  
6 about this testimony?

7 A. Yes. The CASB is a federal government board whose cost allocation  
8 rules apply only to major federal procurement contracts. Those rules do  
9 not apply to regulated public utilities. Nevertheless, the cost allocation  
10 methods used by SCS are consistent with the CASB principles  
11 Ms. Dismukes quotes in her testimony.

12

13 Allocation Factors

14 Q. Ms. Dismukes disputes the use of the three-part financial allocation factor.  
15 Can you provide some history on the use of this factor?

16 A. Yes. Prior to the repeal of the Public Utility Holding Company Act  
17 (PUHCA) in 2005, the allocation methodologies used by SCS were subject  
18 to review and approval by the SEC. The allocation methodologies  
19 approved by the SEC are still in use today. In particular, the methodology  
20 used to calculate the financial factor was approved by the SEC in 1985  
21 and has been used for over 25 years to allocate costs among the  
22 Southern Company affiliates.

23

24 Today, the authority to supervise cost allocations rests with Federal  
25 Energy Regulatory Commission (FERC) and the state commissions.

1 Since the repeal of PUHCA, FERC has made no change in SCS's  
2 allocation methodologies, which are reported to FERC on an annual basis  
3 in SCS's FERC Form 60 filing. Allocations based on this financial factor  
4 have also been reviewed and accepted by this Commission in the two  
5 base rate proceedings Gulf has had since 1985.

6

7 Q. How often are the financial factor and the other fixed allocation factors  
8 recalculated?

9 A. Fixed allocation factors are typically recalculated once a year when the  
10 final data necessary to calculate the factors becomes available from the  
11 prior year. The new factors are used to develop the budget for the  
12 upcoming year and to allocate costs incurred during that year. For  
13 example, new factors were calculated in 2010 based on 2009 data. These  
14 factors are then used to develop the 2011 budget and to allocate 2011  
15 costs.

16

17 Q. What factors were used to allocate costs for the projected 2012 test year?

18 A. The test year costs were allocated based on the 2010 factors that use  
19 data from 2009. This was the most recent actual data available at the  
20 time the projected test year budget was prepared.

21

22 Q. What changes does Ms. Dismukes recommend to the allocation factors  
23 used to project test year expenses?

24 A. Ms. Dismukes recommends three changes. First, she totally revises the  
25 financial factor by excluding operating revenues from the calculation,

1           thereby converting the three component factor to a two component factor.  
2           Second, she recommends excluding fuel and purchased power from the  
3           operating expense factor. Third, she recalculates some, but not all, of the  
4           remaining fixed allocation factors using data from 2010. The combined  
5           effect of these changes is to reduce Gulf's operating expenses by  
6           \$832,284.

7  
8       Q.    Ms. Dismukes uses a couple of examples to support her claim that using  
9           operating revenues in the calculation of the financial factor could bias the  
10          factors. Please comment on these examples.

11     A.    First, Ms. Dismukes uses an example in which she observes that the  
12          revenue per kWh for Southern Power's wholesale business is lower than  
13          Gulf's revenue per kWh for its retail business. From this, she concludes  
14          that using revenue in calculating a cost allocator may not be indicative of  
15          the level of service that SCS provides to Southern Power. However, she  
16          fails to take into account that a much larger infrastructure must be in place  
17          to support Gulf's regulated, retail revenue stream. There are significantly  
18          more employees and assets supporting regulated sales compared to non-  
19          regulated sales. Retail sales require not only power generation facilities,  
20          but also transmission and distribution facilities. SCS supports all of the  
21          activities in each company, and the level of required support for regulated  
22          companies is greater than that required for nonregulated companies.

23  
24     Q.    Ms. Dismukes also observes that when Gulf obtains rate relief, the use of  
25          a revenue component in the financial factor will cause Gulf's share of



1 allocated costs to increase. How will this increase affect Gulf's  
2 customers?

3 A. It will not affect them at all in the short term. The allocations in this case  
4 are based on 2009 data which does not include the effect of the requested  
5 rate increase. When Gulf's revenues increase in 2012 due to rate relief,  
6 that increase will affect the factors calculated in 2013 and used to allocate  
7 2014 costs. Even making the unrealistic assumption that only Gulf's  
8 revenues change, and there has been no change in revenues or the net  
9 assets and expenses of the other affiliated companies, Gulf's allocated  
10 share of costs would be higher beginning in 2014.

11

12 Q. Is there any other flaw in focusing on regulated rate increases when  
13 discussing the revenue component of the financial factor?

14 A. Yes. Ms. Dismukes ignores the fact that the revenue component also  
15 captures revenue growth from price changes by nonregulated affiliates, as  
16 well as sales growth for both regulated and nonregulated affiliates.

17

18 Q. Please comment on Ms. Dismukes' proposal to exclude fuel and  
19 purchased power costs from the operating expense component of the  
20 financial factor.

21 A. This is merely an attempt to arbitrarily shift costs from the regulated  
22 operating companies, including Gulf, to nonregulated businesses that do  
23 not generate electricity and therefore do not incur fuel costs.

24 Ms. Dismukes ignores the fact that SCS provides extensive support for  
25 activities related to fuel and purchased power, including things such as

1 fuel procurement, fuel transportation, the operation of the generating  
2 assets and the sale and acquisition of purchased power. Ignoring these  
3 activities that support the operating companies would result in an unfair  
4 allocation that does not follow the principle of matching cost allocations  
5 with cost incurrence and benefits.

6  
7 Q. Should the Commission reject Ms. Dismukes' recommendation to  
8 recalculate the financial factor by excluding operating revenues in their  
9 entirety and excluding fuel and purchased power expenses from the  
10 operating expense calculation?

11 A. Yes. The three component method for developing the financial factor has  
12 been in place for over 25 years, was approved by the SEC, has not been  
13 changed by the FERC, and has been accepted as a basis for allocation by  
14 the Florida Commission and the commissions in Alabama, Georgia and  
15 Mississippi where Gulf's sister companies operate. The current  
16 methodology gives appropriate weight to each company's revenues,  
17 expenses and assets, each of which affects the amount of support that the  
18 companies require from SCS.

19  
20 Q. Ms. Dismukes also recalculates some fixed allocation factors based on  
21 2010 data. Should the Commission use these recalculated factors to  
22 establish Gulf's test year expenses?

23 A. No. As stated previously, the 2010 statistics were not available when Gulf  
24 prepared the budget information for this filing, and it is inappropriate to  
25 pick and choose what factors you would like to update. If the Commission

1 finds that it is appropriate to update the fixed allocation factors, then it  
2 should update them all using the actual 2010 factors that will apply to  
3 2012 costs. These factors have recently been finalized. Substituting the  
4 2010 fixed allocation factors for the 2009 factors used in Gulf's filing will  
5 actually *increase* Gulf's share of SCS billings by approximately  
6 \$1,262,500. As shown on Exhibit RJM-2, Schedule 1, approximately  
7 \$1,159,000 of this amount represents increased O&M expenses.

8  
9 Specific Work Orders

10 Q. Ms. Dismukes proposes to disallow \$186,780 related to work orders that  
11 Gulf was unable to locate when responding to discovery from OPC. She  
12 asserts that Gulf was unable to provide information demonstrating the  
13 need for the activities, the method used to allocate costs, and the  
14 companies that the costs should be charged to. Please respond to her  
15 assertion.

16 A. In Gulf's response to Citizens' 6<sup>th</sup> Request to Produce Documents No.  
17 108, the Company stated that the original approved work orders could not  
18 be located, but did provide descriptions and justifications for the activities  
19 covered by the work orders. The total budgeted amount allocated to Gulf  
20 was provided in response to Citizens' 1<sup>st</sup> Request to Produce Documents  
21 No. 34, Attachment E. The allocation methods used for each work order  
22 were provided in response to Citizens' 1<sup>st</sup> Request to Produce Documents  
23 No. 34, Attachment B. The information related to the associated costs  
24 and the affiliates who shared in those costs was produced in response to  
25 other requests and is summarized on Exhibit RJM-2, Schedule 2.

1 Ms. Dismukes therefore had access to all of the information that she  
2 erroneously claims Gulf was unable to provide.

3

4 Q. Is the amount charged to these work orders properly included as a test  
5 year expense?

6 A. Yes. The activities represented by these work orders were necessary,  
7 and Gulf's share of the costs was determined using the appropriate cost  
8 allocation factors.

9

10 Q. Please discuss some of the remaining work orders that include costs  
11 Ms. Dismukes contends the Commission should disallow.

12 A. Work Order 471701 (SEC Inquiry). The work order form submitted for this  
13 item was an outdated form. This work order is no longer used for an SEC  
14 inquiry, but has been reused by the SCS Comptroller organization. The  
15 test year amount includes various special projects, including Enterprise  
16 Solutions transition and implementation.

17

18 Work Order 46C805 (Wireless Systems). This work order covers wireless  
19 system materials costs that are capitalized as part of wireless system  
20 upgrade and replacement projects. The increase from 2010 to 2012 in the  
21 amount charged to Gulf through this work order is solely the result of a  
22 change in billing procedures. Wireless materials costs were previously  
23 billed directly to Gulf by Georgia Power Company. After the Enterprise  
24 Solutions accounting software was implemented, the cost of these  
25 wireless materials, which still originate from Georgia Power, are now billed

1 to Gulf through this SCS Work Order. While the amount billed on this  
2 Work Order has increased, the direct billings from Georgia Power have  
3 ended. The capital projects to which these materials expenditures relate  
4 are listed on Schedule 19 of Exhibit RJM-1 to my direct testimony as  
5 Telecommunications Wireless and Scada, Voice and Data Converged  
6 Network, and Telecommunication Transport and Facilities. As shown on  
7 Schedule 19, the amounts are consistent from year to year and have not  
8 increased as a result of this billing change.

9  
10 Work Order 473401 (Benefits Review). A number of benefits reviews are  
11 conducted on a recurring basis or an as-needed basis at various times  
12 throughout the years. Although the specific benefits reviews covered by  
13 this work order take place every other year, there are other normal  
14 benefits review activities that do not fall during the test year. The amount  
15 included in the test year is representative of an on-going level of benefits  
16 review activity and Ms. Dismukes' proposal to amortize the amount of this  
17 work order over two years should be rejected.

18  
19 Work Orders 473ECO and 473ECS (Legal Expenses). The Chief  
20 Operating Officer and External Affairs functions provide services to Gulf,  
21 and any related legal advice is budgeted in these work orders. Each of  
22 these functions requires legal advice to ensure compliance with rules,  
23 regulations, contracts, and agreements. These activities benefit  
24 ratepayers and the expense related to these work orders should be  
25 allowed.

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Work Order 474401 (Public Relations Expenses). Ms. Dismukes proposes to disallow this work order on the grounds that public relations expenses are similar to image building advertising. In fact, this work order covers internal company publications that educate employees about industry, local and company issues, making them better equipped to serve customers. It also includes external public relations messages that are used to communicate billing, safety, and energy efficiency information to Gulf's customers. This helps customers by providing information on alternative ways to receive and pay bills, ways to prevent accidental injuries, and ways to use energy more efficiently, resulting in value and savings to the customer. The costs are reasonable and appropriate, and should be allowed.

Work Order 471501 (Investor Relations-General). I disagree with Ms. Dismukes' recommendation to disallow these investor relations expenses for ratemaking purposes. Investor Relations works with investors to preserve the value of Gulf's securities and to ensure continuous access to capital at favorable rates for the benefit of Gulf and our customers. This work order provides an on-going investor relations program to facilitate informed relationships with existing and potential investors in system equity and debt securities. This ensures that the Company's securities are fully valued by the investment community through regular communications that provide updates on the financial condition and plans of the Company. This type of Investor Relations

1 activity is an essential function for any company with publicly traded  
2 securities and the costs should be allowed.

3  
4 Work Order 4Q51RC (SCGEN IT: Support of Railcar Maintenance). This  
5 work order covers the on-going annual software costs, including  
6 maintenance and enhancements, associated with a new application that is  
7 necessary to effectively and efficiently manage the railcar maintenance  
8 program.

9  
10 Work Order 4QPA01 (PAS Central System Integrity). This work order  
11 covers the ongoing expenses, including support and depreciation, related  
12 to control system integrity (CSI). The CSI tool is used to manage and  
13 document the compliance requirements resulting from the NERC Cyber  
14 Security Standards. The costs are reasonable and appropriate and  
15 should be allowed.

16  
17 Q. Are there any of Ms. Dismukes' work order recommendations that Gulf will  
18 accept?

19 A. Yes. Upon further investigation, Gulf agrees that the activities associated  
20 with Work Order 466909 should have been capitalized, rather than  
21 expensed, resulting in a reduction to test year jurisdictional O&M of  
22 \$343,847 (\$344,204 system). We also agree that it would be appropriate  
23 to amortize the costs of the biannual customer summit (Work Order  
24 49SWCS) over two years, resulting in a reduction to test year jurisdictional  
25 O&M of \$19,450 (\$20,130 system).

1

2

Unregulated Operations

3

Q. What is the magnitude of the Gulf's unregulated revenues?

4

A. Gulf's unregulated test year revenues of \$1.298 million are less than 0.1% of its total retail revenues.

6

7

Q. In discussing the Company's unregulated operations, Ms. Dismukes recommends that the Commission move the unregulated revenues, expenses and investments above-the-line for ratemaking purposes. Is this appropriate?

10

11

A. No. Rule 25-6.1351(2)(g), Florida Administrative Code, defines nonregulated as products or services that are not subject to price regulation by the Commission or are not included for ratemaking purposes and are not reported in surveillance. Consistent with this rule, Gulf's unregulated activities are properly recorded below-the-line and do not impact its revenue requirement request.

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Q. Assuming the Commission were to accept Ms. Dismukes recommendation to move unregulated operations above-the-line, has she correctly calculated the amount of the revenue adjustment?

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A. No. Although I disagree that these operations should be reflected above the line, I have provided a corrected calculation of the amount of any such adjustment. Ms. Dismukes does not account for the fact that for ratemaking purposes, Gulf's investment in its unregulated operations is removed 100% from equity. Further, her calculated ROI's are based on an

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1 end of period investment balance. Per Commission policy and ratemaking  
2 treatment, ROI should be calculated using a thirteen month average. As  
3 reflected on Exhibit RJM-2, Schedules 3 and 4, after reversing the 100%  
4 equity treatment of these unregulated activities and adjusting rate base  
5 and net operating income, the revised jurisdictional return on rate base  
6 would be 7.06% and the net impact of making these adjustments would be  
7 a reduction of \$258,000 in our request.

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9  
10 **II. EMPLOYEE COMPLEMENT AND HIRING LAG**

11  
12 Q. Should the Commission make an adjustment to Gulf's labor expense  
13 based on an assumption that Gulf will not fill its budgeted 1,489 FTEs for  
14 2012?

15 A. No. As of September 30, 2011, Gulf has an employee complement of  
16 1,391 FTEs. This is less than the 2012 budget of 1,489 for two reasons.  
17 First, some of the 159 new positions included in the 2011 and 2012  
18 budgets have not yet been filled. In their rebuttal testimony, Gulf  
19 witnesses Grove, Caldwell, Moore and Neyman explain the reasons that  
20 27 of these 159 positions had not been filled by the middle of October.  
21 This includes 10 positions at Gulf's power plants that have been  
22 eliminated in the final 2012 budget and replaced by an increased  
23 allowance for contract labor. There are plans to fill the remaining 17 new  
24 positions by December 31st of this year.

1 Second, there are other positions temporarily vacant at this time due to a  
2 variety of factors, including voluntary and involuntary separations,  
3 retirements, transfers within the Southern Company system, and transfers  
4 within Gulf. Some of the 159 new positions have been filled by existing  
5 employees, which leaves their old positions to be filled. As a result, the  
6 current number of temporary vacancies due to internal transfers is higher  
7 than normal. Gulf is actively seeking to fill these vacant positions, and  
8 (except for normal turnover) expects to be at or close to a full complement  
9 in 2012.

10  
11 Q. If Gulf does not have a full complement of 1,489 employees throughout  
12 2012, would it be appropriate to make an adjustment to test year payroll  
13 expense?

14 A. No. As I stated in my direct testimony, it is not appropriate to focus on the  
15 labor portion of O&M expenses in isolation. When positions are not filled,  
16 the Company may incur additional overtime and contract labor costs and  
17 may redirect spending to other O&M activities. As shown on Exhibit  
18 RJM-2, Schedule 5, while Gulf historically has had some vacancies in its  
19 budgeted positions, it typically has spent 100% or more of its overall O&M  
20 budget. The major exception has been in the recent past, when Gulf has  
21 taken steps to avoid having to request a rate increase during a period of  
22 economic uncertainty.

23  
24 Further, the rates from this case will go into effect near the end of the first  
25 quarter of 2012. So long as the vacant positions are filled by that time, the

1 full amount of payroll costs will be incurred during the first full year the  
2 rates are in effect.

3  
4 Q. Even if Gulf makes every effort to fill positions, won't there be a hiring lag  
5 that results in some positions being vacant for part of the year due to  
6 voluntary and involuntary separations, retirements, deaths, transfers within  
7 the Southern Company system, and transfers within Gulf?

8 A. Yes. This type of hiring lag is found in any business. However, for the  
9 reasons I discussed previously, this does not mean that the dollars  
10 budgeted for payroll will not be spent on contract labor, overtime, or other  
11 operational needs.

12  
13 Q. If the Commission does decide to make an adjustment for hiring lag  
14 associated with normal employee turnover, how should the amount of that  
15 adjustment be calculated?

16 A. The amount of the adjustment for a hiring lag should be calculated based  
17 on the estimated employee turnover during the year times the average  
18 time it takes to fill a vacant position times the average salary. Exhibit  
19 RJM-2, Schedule 6, calculates a hiring lag adjustment based on this  
20 approach. The calculation of average employee turnover and the time  
21 required to fill these positions, by employee classification (covered,  
22 exempt and non-exempt) is based on data for 2008 through 2010. The  
23 average salary estimate is based on actual 2011 salaries by employee  
24 classification. This calculation results in a total Company hiring lag of  
25 approximately \$610,697 of which \$448,069 represents O&M payroll.

1

2 Q. The amount shown on your exhibit is substantially less than the  
3 \$5.2 million adjustment proposed by FEA witness Meyer or the  
4 \$3.2 million proposed by OPC witness Ramas. Do you have any  
5 comments on their calculations?

6 A. Yes, I believe that both Mr. Meyer and Ms. Ramas used erroneous  
7 assumptions that cause them to substantially overstate the amount of any  
8 hiring lag adjustment.

9

10 Mr. Meyer states that he would allow 1,365 employees, which represents  
11 Gulf's employee complement at June 30, 2011. Of the 124 vacancies he  
12 calculated, he attributed 51 to positions that would be funded by O&M  
13 dollars and proposed an adjustment of \$5.2 million. As indicated above, by  
14 September 30, 2011 Gulf's actual number of employees had increased to  
15 1,391, or 26 more than the June 30 level and Gulf is continuing to fill  
16 vacancies. It is therefore not reasonable that the June 30 level of O&M  
17 vacancies will exist throughout 2012.

18

19 Mr. Meyer also calculated the dollar amount of his adjustment by  
20 multiplying his assumed vacancies by Gulf's average budgeted wages and  
21 benefits, using an average \$101,339 as reported on Gulf's MFR C-35. In  
22 fact, the average budgeted wages and benefits for the O&M positions that  
23 are currently unfilled is substantially lower, since many of them are entry  
24 level positions.

25

1 Ms. Ramas developed her adjustment by taking an average vacancy rate  
2 of 6.1% using data from 2006-2010, and multiplying that rate times the  
3 1,489 budgeted positions, to calculate 91 vacancies. She then proposed  
4 to disallow the O&M portion of 91 of the 159 new positions (or conversely,  
5 to allow the O&M costs for only 68 of the new positions), for a total  
6 adjustment of \$3.2 million. Ms. Ramas' calculation does not take into  
7 account that during a large part of the historic period used to calculate her  
8 vacancy rate, Gulf was closely managing expenses and holding positions  
9 vacant in an effort to avoid having to seek a rate increase. Further, her  
10 calculation gives no consideration to the justification for the 159 new  
11 positions, the number of those positions that have already been filled, or  
12 Gulf's plans for filling the remaining vacancies.

13  
14 Q. Do you have any other comments on Mr. Meyer's and Ms. Ramas'  
15 calculations?

16 A. Yes. Both witnesses looked only at recent vacancies (June 30) or  
17 historical levels of vacancies (2006-2010) in deciding what adjustment to  
18 propose. Neither of them identified any specific position that could or  
19 should be eliminated. They did not challenge the detailed justifications  
20 provided by Gulf's witnesses regarding the need for the budgeted  
21 positions. Instead, they arbitrarily used historical data to eliminate dollars  
22 that are required to operate Gulf's business at a level that will continue to  
23 ensure safe, reliable and efficient service to its customers. For this reason  
24 alone, their proposed adjustments should be rejected.

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**III. NORTH ESCAMBIA SITE IN RATE BASE**

Q. Please briefly summarize Gulf's proposal for including the North Escambia generating site in rate base.

A. As described in my direct testimony, Gulf proposes to transfer into rate base the land and other deferred charges related to its deferred nuclear site selection costs and to discontinue deferring a return on those amounts.

Q. In your direct testimony you state that "these costs have been deferred in accordance with Florida Statute 366.93 and include all deferred costs, including a deferred return, through the end of 2011." Did you say that Gulf's proposal to cease the accrual of carrying charges and transfer the site costs to rate base at this time is explicitly authorized by this statute as several intervenor witnesses seem to state?

A. No. Section 366.93 is important to Gulf's request because this statute provides authorization for Gulf to record a deferred return on assets of this type. Gulf's proposal to discontinue the deferral, and move the dollars into rate base, relies on the Commission's general ratemaking authority, not on the specific provisions of Section 366.93.

1 **IV. PARENT DEBT ADJUSTMENT**

2

3 Q. Please summarize Gulf's position with regard to a parent debt adjustment.

4 A. As discussed in the direct testimony of Gulf witness Teel and the rebuttal  
5 testimony of Gulf witness Deason, the Commission should not make a  
6 parent debt adjustment in this case. Gulf has rebutted the presumption  
7 that an adjustment is required by the rule or by the policy underlying the  
8 rule.

9

10 Q. In the event the Commission does make a parent debt adjustment,  
11 Ms. Ramas calculates the jurisdictional amount of the adjustment as  
12 \$1,766,000. Do you agree with her calculation?

13 A. No. I agree that the amount of \$2,126,000 on MFR C-24 is the proper  
14 system amount to use as the starting basis for the calculation. In  
15 determining the jurisdictional amount, however, Ms. Ramas uses the  
16 income tax jurisdictional factor of 0.8305076 from MFR C-4 (page 6 of 6,  
17 column 8, line 11). The calculation of that jurisdictional factor excluded  
18 the income tax expense associated with the Scherer Unit Power Sales  
19 from the denominator of the fraction, and therefore does not accurately  
20 reflect retail income tax expenses as a percentage of the total adjusted  
21 utility amount.

22

23 As shown on MFR C-4 (page 6 of 6, line 11), total adjusted income taxes  
24 were \$30,449,000 (column 4) and the retail jurisdictional amount was  
25 \$15,234,000 (column 7). The correct jurisdictional income tax factor is

1 0.5003120. Applying this factor to the system amount of \$2,126,000  
2 results in a jurisdictional adjustment of \$1,063,663, which is substantially  
3 less than the \$1,766,000 proposed by Ms. Ramas.  
4  
5

6 **V. OTHER ISSUES**  
7

8 Q. OPC witness Woolridge provides cost rates for debt and preference stock  
9 that are lower than those contained in Gulf's MFRs. Should the  
10 Commission use Dr. Woolridge's cost rates?

11 A. No. I agree that Gulf's debt and preference stock costs should be  
12 updated, but I disagree with the costs presented by Dr. Woolridge. Gulf's  
13 response to Citizens' 8<sup>th</sup> Set of Interrogatories No. 263 reflects Gulf's  
14 actual cost rates incurred on debt and preference stock issued through  
15 August 2011, and the cost of projected issues incorporating Gulf's most  
16 current interest rate forecast. The updated projections were based on  
17 Moody's Analytics September 2011 forecast. As shown in that response,  
18 the appropriate costs are 0.13% for short-term debt, 5.26% for long term  
19 debt, and 6.39% for preference stock.  
20

21 Q. FEA witnesses Meyer and Gorman have calculated a deferred tax balance  
22 that is different from that contained in Gulf's MFRs and have used their  
23 calculated balance in determining Gulf's capital structure and cost of  
24 capital. Is their calculated balance correct?  
25



1 A. No. The balance of \$492.1 million shown on Schedule 12 of Exhibit  
2 RJM-1 to my direct testimony is net of the SFAS 109 regulatory tax assets  
3 and liabilities. In calculating his amount, Mr. Meyer failed to take into  
4 account the SFAS 109 regulatory tax assets and liabilities which are  
5 included in FERC Accounts 182 and 254, and are shown separately on  
6 Gulf witness Buck's Exhibit WGB-1, Schedule 7 (pages 1 and 3). These  
7 regulatory tax assets and liabilities along with the deferred taxes must be  
8 included in the capital structure at zero cost in accordance with FPSC  
9 Rule 25-14.013, Accounting for Deferred Income Taxes Under SFAS 109.  
10 Gulf has provided information on this issue in response to an FEA's 1<sup>st</sup> Set  
11 of Interrogatories No. 44. After reviewing that response, I expect  
12 Mr. Meyer will accept Gulf's deferred tax balance.

13

14 Q. Ms. Ramas recommends that the Commission should remove from test  
15 year expense an additional \$48,000 related to financial planning services  
16 provided to Gulf's executives. Please comment.

17 A. I agree with this adjustment. My adjustment 21 to Gulf's net operating  
18 income on Exhibit RJM-1, Schedule 4, (page 3 of 3) was intended to  
19 exclude 100% of these costs. In responding to discovery by OPC, we  
20 discovered that we had inadvertently removed less than the full amount  
21 included in the 2012 budget. The additional adjustment recommended by  
22 Ms. Ramas is appropriate to correct this oversight.

23

24 Q. Do you agree with Mr. Meyer's proposed adjustment to impute \$1.9 million  
25 in additional base rates revenues associated with Sales for Resale?

1 A. No. Mr. Meyer's analysis focuses on the difference between actual results  
2 in 2011 and the forecasted result for 2012. The actual results for years  
3 prior to 2011 show amounts of Sales for Resale that are consistent with or  
4 lower than Gulf's forecast amount for 2012. However, Mr. Meyer ignores  
5 this prior year history and uses data from 12 month-to-date June 2011  
6 only. This ignores the fact that the economic factors which impact Gulf's  
7 Sales for Resale on a month by month basis are variable and volatile in  
8 nature and cannot be accounted for by a simplistic forecasting approach.

9  
10 Making a simple assumption that recent historical results will translate into  
11 future results does not take into account the robust budgeting and  
12 planning process that Gulf undertakes each year in preparing its annual  
13 energy budget and forecast or the physical operating constraints that may  
14 impact some of Gulf's generating capacity. The sales margin included in  
15 Sales for Resale is the result of the Fuel/Interchange Budgeting Process  
16 described on pages 6 through 8 of MFR F-5. This sophisticated modeling  
17 process takes into account fuel price forecasts, generating unit operating  
18 assumptions, system transmission operating assumptions, and forecasted  
19 load and sales information to simulate the economic dispatch of the  
20 generating assets of the entire Southern electric system. This process  
21 produces Gulf's forecasted unit capacity factors, unit performance data,  
22 pool energy interchange, off-system energy sales, and fuel consumption  
23 expense that are the basis of Gulf's test year forecast. Mr. Meyer's  
24 oversimplification does not recognize that Sales for Resale is just one  
25 component output of this overall budgeting process. Manually changing

1 one output component without taking into account the other interrelated  
2 components of the forecast will yield results that are inconsistent with the  
3 input assumptions to the fuel and energy budget models.  
4

5 Q. Can you explain why the 12 month-to-date June 2011 Sales for Resale is  
6 higher than prior years and the forecast for 2012?

7 A. The amount for this period is higher than historical values for several  
8 reasons. A primary factor is the market price of natural gas. Gulf has  
9 added significant generating capacity in the form of gas fired power  
10 purchase agreements (PPAs) in recent years. These gas fired PPA units  
11 are dispatched by the system based on economics – the primary driver  
12 being the cost of fuel – and other factors such as customer demand and  
13 operational constraints. Lower market prices for natural gas have resulted  
14 in Gulf's gas-fired generating units being economically dispatched at  
15 higher levels in 2011 than in past years. Gulf's generation that exceeds its  
16 own retail customer load is dispatched by the Southern system pool to  
17 serve system loads and the associated revenue is credited to Gulf as  
18 Sales for Resale. Operating constraints on electric transmission and  
19 natural gas transportation are limiting factors in the economic dispatch of  
20 Gulf's Central Alabama PPA resources. As electric transmission and gas  
21 pipeline capacity is available, Gulf's PPA units are available to be  
22 dispatched to serve load. In 2011, the system's operating conditions  
23 permitted the units to run more than forecasted and as a result Gulf's  
24 Sales for Resale were greater than forecasted.  
25

1 While the existing operating constraints are being addressed through  
2 transmission construction and gas pipeline contract initiatives, these  
3 issues will not be resolved in the test year. With these constraints, there  
4 can be no assurance that the same system operating conditions will allow  
5 the units to operate as they have in 2011. These constraints remain in the  
6 energy modeling assumptions for the test year and the model accordingly  
7 forecasts our Sales for Resale at previous levels.  
8

9 Q. Do you have other concerns with Mr. Meyer's calculation?

10 A. Yes. Mr. Meyer states in his testimony that he derived his adjustment by  
11 taking the 8.6% margin from Gulf's 2011 and 2012 forecast and applying it  
12 to twelve months-to-date actual June 30, 2011 Sales for Resale of  
13 \$211.0 million to estimate what the margin would be for that time period  
14 (\$18.1 million). As shown in Gulf's response to FEA's 3<sup>rd</sup> Set of  
15 Interrogatories No. 63, the actual Sales for Resale Adjusted Total for the  
16 twelve months-to-date June 30, 2011 is \$17,361,000. Using this data  
17 would result in a significantly smaller adjustment (\$1,073,000) than what  
18 Mr. Meyer calculated (\$1,825,000). As stated previously, the margins are  
19 a function of economic dispatch and not based upon fixed percentages.  
20

21 Q. Ms. Ramas recommends that unamortized rate case expense should be  
22 excluded from the working capital amounts included in Gulf's rate base.  
23 Do you agree with this recommendation?

24 A. No. Rate case expenses are prudently incurred business expenses. The  
25 Company's investors should be allowed to fully recover these costs,

1 including a return on the unamortized balance. This unamortized balance  
2 should be included in working capital, consistent with the Commission's  
3 treatment in our last rate case.

4  
5 Q. Do you have any observations about the various O&M adjustments  
6 proposed by Mr. Schultz?

7 A. Yes. Since his particular adjustments are addressed in the rebuttal  
8 testimony of other witnesses, I will just make a general observation. The  
9 various bases for Mr. Schultz's adjustments are totally inconsistent.

- 10 • For storm accrual, his adjustment is based on a ten-year average  
11 from 2001 to 2010, but assigning \$0 to the two years – 2004 and  
12 2005 – in which there were major storms. In addition, he made no  
13 adjustment for inflation.
- 14 • For tree trimming expense, his adjustment is based on a four-year  
15 average from 2007-2010, adjusted by an escalation factor.
- 16 • For pole line inspection expense, his adjustment is based on a  
17 single year, 2010, adjusted by an escalation factor.
- 18 • For fossil plant maintenance, his adjustment is based on a five-  
19 year average from 2006-2010 adjusted by an escalation factor and  
20 a labor cost adjustment.

21 This selective use of different historic periods as the starting basis for  
22 O&M expense while ignoring the Company's justification for test year  
23 amounts appears designed to maximize the amount of his recommended  
24 O&M disallowances. For this reason, all of his recommendations should  
25 be viewed with skepticism.

1 **VI. SUMMARY**

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Q. Please summarize your rebuttal testimony.

A. My testimony first rebuts several aspects of Ms. Dismukes' testimony. I demonstrate that the cost allocations to Gulf from Southern Company Services are based on appropriate cost allocation methodologies that were previously approved by the SEC, have not been modified by FERC, have been used by the Southern Company system for over 25 years, and have been accepted as the basis for ratemaking in cases before this Commission and the commissions in Alabama, Georgia and Mississippi. They remain appropriate for use in this rate proceeding. Ms. Dismukes' recommendations to change the financial allocation methodology and to update some, but not all, of the factors based on more recent data should be rejected. Although Gulf is not seeking an update, if all fixed percentage allocation factors were updated the result would be an increase, not a decrease, in Gulf's revenue requirements. Next, I provide justification for the costs on a number of work orders that Ms. Dismukes would disallow in whole or in part. Finally, I show that her recommendation to move the revenues, expenses and investment for unregulated operations above-the-line should be rejected.

Next, I rebut recommendations by Mr. Meyer and Ms. Ramas to disallow a portion of Gulf's payroll costs related to employee vacancies or hiring lag. I show that labor costs cannot be viewed in isolation, and that Gulf's total level of O&M expense is reasonable even if some vacancies exist during

1 the year. I also show that the amount these witnesses propose to disallow  
2 is significantly greater than any properly calculated hiring lag adjustment.

3  
4 With regard to Gulf's proposal to include its North Escambia County  
5 generating site in rate base, I clarify an apparent misunderstanding by  
6 various intervenor witnesses about the role that Florida Statutes Section  
7 366.93 plays in Gulf's request.

8  
9 I note that other Company witnesses demonstrate why a parent debt  
10 adjustment is not appropriate in this case. If the Commission nevertheless  
11 decides to make a parent debt adjustment, I show that the jurisdictional  
12 amount of that adjustment is substantially lower than what was calculated  
13 by Ms. Ramas.

14  
15 Finally, I update Gulf's cost of debt and preference stock, and  
16 demonstrate that Gulf included the correct balance of deferred taxes in  
17 capital structure and included an appropriate amount of test year revenues  
18 from Sales for Resale. I also explain why unamortized rate case expense  
19 should be included in working capital and provide reasons that  
20 Mr. Schultz's proposed expense adjustments should be viewed with  
21 skepticism.

22  
23 Q. Mr. McMillan, does this conclude your testimony?

24 A. Yes.

25

AFFIDAVIT

STATE OF FLORIDA     )  
                                  )  
COUNTY OF ESCAMBIA )

Docket No. 110138-EI

Before me the undersigned authority, personally appeared Richard J. McMillan, who being first duly sworn, deposes, and says that he is the Corporate Planning Manager of Gulf Power Company, a Florida corporation, and that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.

The original affidavit is attached to the original testimony on file with the FPSC.

s/ \_\_\_\_\_  
Richard J. McMillan  
Corporate Planning Manager

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, 2011.

\_\_\_\_\_  
Notary Public, State of Florida at Large  
Commission No. \_\_\_\_\_  
My Commission Expires \_\_\_\_\_



**Change in SCS Billings to Gulf Using Updated  
Fixed Allocation Factors (based on 2010 Statistics)**  
(in dollars)

Capital	24,499
O&M	1,158,957
Below the Line	79,086
	<u>1,262,542</u>

See pages 2-18 for additional details

DOCUMENT NUMBER-DATE

08161 NOV-4 =

FPSC-COMMISSION CLERK

**2012 SCS Budget - Fixed Allocations (2009 Statistics vs 2010 Statistics)**

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
4030AS	50000000	\$ 40,700	\$ 40,700	\$ -	HD	0.0626	0.0626	0
4030AS	50000000	69,107	69,107	-	HD	0.0626	0.0626	0
4030MU	50000000	3,620	3,620	-	HD	0.0626	0.0626	0
4030SS	50000000	387	387	-	HD	0.0626	0.0626	0
403S01	50000000	199,235	199,235	-	HC	0.0774	0.0774	0
404003	50000000	1,332	1,332	-	HB	0.0666	0.0666	0
40401T	50500000	16,968	16,968	-	HB	0.0666	0.0666	0
4040PH	50000000	181	181	-	HB	0.0666	0.0666	0
4040PM	50000000	780	780	-	HB	0.0666	0.0666	0
4040PT	50000000	1,356	1,356	-	HB	0.0666	0.0666	0
4040PV	50000000	181	181	-	HB	0.0666	0.0666	0
4040RC	50000000	2,894	2,894	-	HB	0.0666	0.0666	0
4040RE	50000000	186	186	-	HB	0.0666	0.0666	0
4040RW	50000000	4,602	4,602	-	HB	0.0666	0.0666	0
404101	50600000	16,100	16,249	149	ET	0.0755	0.0762	0.0007
4042OP	51000000	37,847	37,847	-	HB	0.0666	0.0666	0
4042RM	51000000	25,522	25,522	-	HB	0.0666	0.0666	0
4042TC	51000000	23,888	23,888	-	HB	0.0666	0.0666	0
4042TD	51000000	964	964	-	HB	0.0666	0.0666	0
4042TI	51000000	3,366	3,366	-	HB	0.0666	0.0666	0
4042TL	51000000	4,215	4,215	-	HB	0.0666	0.0666	0
4042TM	51000000	3,864	3,864	-	HB	0.0666	0.0666	0
4042TV	51000000	1,878	1,878	-	HB	0.0666	0.0666	0
404301	50000000	35,036	35,036	-	HD	0.0626	0.0626	0
404401	50600000	39,980	40,351	371	ET	0.0755	0.0762	0.0007
4044XP	50000000	27,617	27,873	256	ET	0.0755	0.0762	0.0007
404501	50600000	15,586	15,586	-	HD	0.0626	0.0626	0
40MRGE	50000000	263	263	-	HD	0.0626	0.0626	0
425122	30802400	8,133	8,033	(100)	A0	0.0729	0.072	-0.0009
426801	90800000	122,536	121,023	(1,513)	A0	0.0729	0.072	-0.0009
4268QD	90800000	45	45	(1)	A0	0.0729	0.072	-0.0009
426901	50600000	105,229	108,090	2,861	CN	0.0846	0.0869	0.0023
4269BL	42640000	69,050	70,927	1,877	CN	0.0846	0.0869	0.0023
4269CL	50000000	270,720	278,080	7,360	CN	0.0846	0.0869	0.0023
4269CO	50000000	15,307	15,723	416	CN	0.0846	0.0869	0.0023
4269KC	50000000	3,479	3,573	95	CN	0.0846	0.0869	0.0023
4269KL	50000000	20,542	21,101	558	CN	0.0846	0.0869	0.0023
4269LL	50600000	418,770	430,155	11,385	CN	0.0846	0.0869	0.0023
4269ML	50000000	84,600	86,900	2,300	CN	0.0846	0.0869	0.0023
4269MP	50000000	6,757	6,941	184	CN	0.0846	0.0869	0.0023
4269PL	50000000	42,300	43,450	1,150	CN	0.0846	0.0869	0.0023
4269PR	50600000	16,227	16,668	441	CN	0.0846	0.0869	0.0023
4269WL	50600000	8,460	8,690	230	CN	0.0846	0.0869	0.0023
427001	56600000	56,987	56,283	(704)	A0	0.0729	0.072	-0.0009
427101	55600010	17,115	16,903	(211)	A0	0.0729	0.072	-0.0009
427201	55600010	52,610	51,961	(650)	A0	0.0729	0.072	-0.0009

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
427301	58100000	71,611	70,726	(884)	A0	0.0729	0.072	-0.0009
4299LD	50600000	3,870	3,870	-	HC	0.0774	0.0774	0
4323CP	50600000	87,442	87,442	-	HD	0.0626	0.0626	0
435101	50100000	149,495	165,889	16,395	CP	0.0693	0.0769	0.0076
435105	50100000	35,697	39,612	3,915	CP	0.0693	0.0769	0.0076
435106	50100000	47,468	52,674	5,206	CP	0.0693	0.0769	0.0076
435111	50100000	19,037	21,125	2,088	CP	0.0693	0.0769	0.0076
435112	50100000	32,848	36,451	3,602	CP	0.0693	0.0769	0.0076
435114	50100000	21,976	24,386	2,410	CP	0.0693	0.0769	0.0076
435115	50100000	3,595	3,990	394	CP	0.0693	0.0769	0.0076
435116	50100000	24,222	26,878	2,656	CP	0.0693	0.0769	0.0076
435117	50100000	24,062	26,701	2,639	CP	0.0693	0.0769	0.0076
435118	30000000	12,479	13,847	1,369	CP	0.0693	0.0769	0.0076
435120	50100000	14,174	15,729	1,554	CP	0.0693	0.0769	0.0076
4351AM	50100000	18,969	21,049	2,080	CP	0.0693	0.0769	0.0076
4351B1	50100000	14,501	16,091	1,590	CP	0.0693	0.0769	0.0076
4351GN	50100000	109,413	121,412	11,999	CP	0.0693	0.0769	0.0076
4351RM	50100000	6,656	7,386	730	CP	0.0693	0.0769	0.0076
4351T2	50100000	450	500	49	CP	0.0693	0.0769	0.0076
435201	50100000	214,020	219,040	5,020	AB	0.0938	0.096	0.0022
4352GH	54700000	65,928	67,474	1,546	AB	0.0938	0.096	0.0022
4352GN	54700000	49,365	50,522	1,158	AB	0.0938	0.096	0.0022
435601	50600000	20,882	20,882	-	HB	0.0666	0.0666	0
435801	50600000	72,158	72,158	-	HB	0.0666	0.0666	0
436201	50600000	57,657	54,788	(2,870)	A1	0.0663	0.063	-0.0033
43622A	93020710	487	463	(24)	A1	0.0663	0.063	-0.0033
4362LM	50600000	3,547	3,371	(177)	A1	0.0663	0.063	-0.0033
436501	50600000	221,034	221,034	-	HA	0.0836	0.0836	0
4365CS	50600002	1,725	1,725	-	HA	0.0836	0.0836	0
4365DP	50600000	10,450	10,450	-	HA	0.0836	0.0836	0
4365FA	51000000	5,646	5,646	-	HA	0.0836	0.0836	0
437501	50600000	362,486	344,444	(18,042)	A1	0.0663	0.063	-0.0033
438701	90800000	181,966	179,719	(2,246)	A0	0.0729	0.072	-0.0009
4387C8	90800000	1,043	1,030	(13)	A0	0.0729	0.072	-0.0009
4387CH	90800000	197	195	(2)	A0	0.0729	0.072	-0.0009
4387RH	90800000	1,043	1,030	(13)	A0	0.0729	0.072	-0.0009
438901	50000000	7,993	7,993	-	HD	0.0626	0.0626	0
4389GF	50000000	8,669	8,669	-	HD	0.0626	0.0626	0
4389TF	50000000	202,774	202,774	-	HD	0.0626	0.0626	0
439901	50600000	166,102	166,102	-	HC	0.0774	0.0774	0
4399PP	50000000	2,355	2,355	-	HC	0.0774	0.0774	0
4399SC	50000000	28,255	28,255	-	HC	0.0774	0.0774	0
440001	50000000	59,582	59,582	-	HC	0.0774	0.0774	0
442901	50600002	106,460	106,460	-	HA	0.0836	0.0836	0
442904	50600002	34,725	34,725	-	HA	0.0836	0.0836	0
442908	50600002	4,489	4,489	-	HA	0.0836	0.0836	0
4429AA	50600002	12,110	12,110	-	HA	0.0836	0.0836	0
44520P	51000000	3,299	3,299	-	HD	0.0626	0.0626	0

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
44520T	51000000	3,325	3,325	-	HD	0.0626	0.0626	0
44521Q	51000000	2,199	2,199	-	HD	0.0626	0.0626	0
44525T	51000000	3,879	3,879	-	HD	0.0626	0.0626	0
4452C5	51000000	4,461	4,461	-	HD	0.0626	0.0626	0
4452C8	51000000	19,325	19,325	-	HD	0.0626	0.0626	0
4452CP	51000000	1,768	1,768	-	HD	0.0626	0.0626	0
4452DS	51000000	8,869	8,869	-	HD	0.0626	0.0626	0
4452ES	51000000	16,453	16,453	-	HD	0.0626	0.0626	0
4452FF	51000000	12,826	12,826	-	HD	0.0626	0.0626	0
4452HB	51000000	9,685	9,685	-	HD	0.0626	0.0626	0
4452HE	51000000	13,560	13,560	-	HD	0.0626	0.0626	0
4452JQ	51000000	913	913	-	HD	0.0626	0.0626	0
4452LD	51000000	1,698	1,698	-	HD	0.0626	0.0626	0
4452LE	51000000	1,953	1,953	-	HD	0.0626	0.0626	0
4452LK	51000000	405	405	-	HD	0.0626	0.0626	0
4452LL	51000000	1,353	1,353	-	HD	0.0626	0.0626	0
4452LM	51000000	1,357	1,357	-	HD	0.0626	0.0626	0
4452NS	51000000	64,335	64,335	-	HD	0.0626	0.0626	0
4452SP	51000000	23,150	23,150	-	HD	0.0626	0.0626	0
4452WC	51000000	4,593	4,593	-	HD	0.0626	0.0626	0
445301	50600003	54,474	54,474	-	HC	0.0774	0.0774	0
445501	50600000	7,527	9,680	2,153	HE	0.0444	0.0571	0.0127
4455CL	50600000	1,648	2,120	472	HE	0.0444	0.0571	0.0127
4455CS	50600000	177,600	228,400	50,800	HE	0.0444	0.0571	0.0127
4455UN	50600000	66,066	84,964	18,897	HE	0.0444	0.0571	0.0127
445601	50600000	91,557	87,000	(4,557)	A1	0.0663	0.063	-0.0033
445701	50600000	756	718	(38)	A1	0.0663	0.063	-0.0033
44612D	50600000	4,899	4,899	-	HC	0.0774	0.0774	0
44612F	50600000	3,134	3,134	-	HC	0.0774	0.0774	0
44612M	50600000	1,342	1,342	-	HC	0.0774	0.0774	0
44612N	50600000	2,116	2,116	-	HC	0.0774	0.0774	0
44612P	50600000	4,183	4,183	-	HC	0.0774	0.0774	0
44615C	50600000	1,965	1,965	-	HC	0.0774	0.0774	0
4461BB	50600000	7,118	7,118	-	HC	0.0774	0.0774	0
4461C3	50600000	111	111	-	HC	0.0774	0.0774	0
4461CJ	50600000	3,775	3,775	-	HC	0.0774	0.0774	0
4461CK	50600000	1,309	1,309	-	HC	0.0774	0.0774	0
4461DC	50600000	132,024	132,024	-	HC	0.0774	0.0774	0
4461EN	50600000	4,805	4,805	-	HC	0.0774	0.0774	0
4461JA	50600000	6,401	6,401	-	HC	0.0774	0.0774	0
4461JC	50600000	931	931	-	HC	0.0774	0.0774	0
4461JE	50600000	5,325	5,325	-	HC	0.0774	0.0774	0
4461KR	50600000	3,150	3,150	-	HC	0.0774	0.0774	0
4461MA	50600000	14,620	14,620	-	HC	0.0774	0.0774	0
4461OP	50600000	24,388	24,388	-	HC	0.0774	0.0774	0
4461PH	50600000	1,471	1,471	-	HC	0.0774	0.0774	0
4461PK	50600000	2,267	2,267	-	HC	0.0774	0.0774	0
4461PM	50600000	4,649	4,649	-	HC	0.0774	0.0774	0

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
4461PN	50600000	2,627	2,627	-	HC	0.0774	0.0774	0
4461PT	50600000	21,019	21,019	-	HC	0.0774	0.0774	0
4461RC	50600000	36,010	36,010	-	HC	0.0774	0.0774	0
4461RK	50600000	5,031	5,031	-	HC	0.0774	0.0774	0
4461SC	50600000	4,021	4,021	-	HC	0.0774	0.0774	0
4461TR	50600000	3,461	3,461	-	HC	0.0774	0.0774	0
4461WP	50600000	2,846	2,846	-	HC	0.0774	0.0774	0
4486ME	30802400	8,225	8,123	(102)	A0	0.0729	0.072	-0.0009
452301	50600002	337,154	346,320	9,166	CN	0.0846	0.0869	0.0023
4568PM	30802400	5,117	5,054	(63)	A0	0.0729	0.072	-0.0009
4608AS	30904810	10,620	10,110	(510)	KB	0.0458	0.0436	-0.0022
4608DB	30904810	3,342	3,182	(161)	KB	0.0458	0.0436	-0.0022
4608IP	30904810	17,990	17,126	(864)	KB	0.0458	0.0436	-0.0022
4608LE	30904810	24,002	22,849	(1,153)	KB	0.0458	0.0436	-0.0022
4608RS	30904810	14,605	13,903	(702)	KB	0.0458	0.0436	-0.0022
4608SC	30904810	52,080	49,578	(2,502)	KB	0.0458	0.0436	-0.0022
4608SO	58000000	151	144	(7)	KB	0.0458	0.0436	-0.0022
4608TC	30904810	1,513	1,441	(73)	KB	0.0458	0.0436	-0.0022
4651A1	92300700	461	504	44	GV	0.076	0.0832	0.0072
4651S1	92300700	384	421	36	GV	0.076	0.0832	0.0072
4651W1	92300700	3,403	3,725	322	GV	0.076	0.0832	0.0072
4661M1	90800000	1,750	1,753	4	CQ	0.0973	0.0975	0.0002
4661MB	90800000	103,593	103,806	213	CQ	0.0973	0.0975	0.0002
4661MS	90800000	7,553	7,569	16	CQ	0.0973	0.0975	0.0002
4661MT	90800000	43,568	43,658	90	CQ	0.0973	0.0975	0.0002
4661RW	58600000	17,947	17,984	37	CQ	0.0973	0.0975	0.0002
4661UP	58600000	195	195	0	CQ	0.0973	0.0975	0.0002
4661W1	58600000	1,968	1,972	4	CQ	0.0973	0.0975	0.0002
4661W9	58600000	218	218	0	CQ	0.0973	0.0975	0.0002
466909	58800000	402,862	397,889	(4,974)	A0	0.0729	0.072	-0.0009
4669NM	58800000	160	158	(2)	A0	0.0729	0.072	-0.0009
4669ST	58800000	2,904	2,869	(36)	A0	0.0729	0.072	-0.0009
4675EM	55600010	44,482	43,933	(549)	A0	0.0729	0.072	-0.0009
4675FA	55600010	8,204	8,103	(101)	A0	0.0729	0.072	-0.0009
4675FR	55600010	160	158	(2)	A0	0.0729	0.072	-0.0009
4675MA	55600010	63,130	62,351	(779)	A0	0.0729	0.072	-0.0009
46AD01	73700000	52,017	57,000	4,982	GT	0.0783	0.0858	0.0075
46AP01	50600000	9,205	10,087	882	GT	0.0783	0.0858	0.0075
46APPO	92300700	1,003	1,099	96	GT	0.0783	0.0858	0.0075
46APPP	50600000	4,543	4,978	435	GT	0.0783	0.0858	0.0075
46APSP	50600000	437	479	42	GT	0.0783	0.0858	0.0075
46AT01	58800000	67,207	67,345	138	CQ	0.0973	0.0975	0.0002
46AT02	58800000	207,918	208,345	427	CQ	0.0973	0.0975	0.0002
46ATOV	58800000	22,386	22,432	46	CQ	0.0973	0.0975	0.0002
46ATUP	58800000	2,455	2,460	5	CQ	0.0973	0.0975	0.0002
46CAOP	90300000	49,247	49,348	101	CQ	0.0973	0.0975	0.0002
46CAOS	90300000	43,085	43,173	89	CQ	0.0973	0.0975	0.0002
46CC10	90300000	14,248	14,277	29	CQ	0.0973	0.0975	0.0002

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
46CC20	90300000	18,001	18,038	37	CQ	0.0973	0.0975	0.0002
46CC40	90300000	7,353	7,369	15	CQ	0.0973	0.0975	0.0002
46CC50	90300000	20,892	20,935	43	CQ	0.0973	0.0975	0.0002
46CC90	90300000	45,483	45,577	93	CQ	0.0973	0.0975	0.0002
46CCVD	90300000	11,837	11,862	24	CQ	0.0973	0.0975	0.0002
46CCVR	90300000	57,835	57,954	119	CQ	0.0973	0.0975	0.0002
46CD01	90300000	352,005	352,728	724	CQ	0.0973	0.0975	0.0002
46CS02	90300000	53,274	53,384	110	CQ	0.0973	0.0975	0.0002
46CS06	90300000	4,403	4,412	9	CQ	0.0973	0.0975	0.0002
46CS24	90300000	17,980	18,017	37	CQ	0.0973	0.0975	0.0002
46CS25	90300000	5,108	5,119	11	CQ	0.0973	0.0975	0.0002
46CS26	90300000	14,239	14,269	29	CQ	0.0973	0.0975	0.0002
46CS35	90300000	31,742	31,807	65	CQ	0.0973	0.0975	0.0002
46CSAM	90300000	24,325	24,375	50	CQ	0.0973	0.0975	0.0002
46CSAS	90300000	915,628	917,510	1,882	CQ	0.0973	0.0975	0.0002
46CSBS	90300000	508,454	509,500	1,045	CQ	0.0973	0.0975	0.0002
46CSMS	90300000	479	480	1	CQ	0.0973	0.0975	0.0002
46CSMU	90300000	663,229	664,592	1,363	CQ	0.0973	0.0975	0.0002
46DBDB	30904810	261,362	256,393	(4,969)	EY	0.0526	0.0516	-0.001
46DC01	30802400	9,683	9,563	(120)	A0	0.0729	0.072	-0.0009
46DC09	58800000	28,468	28,116	(351)	A0	0.0729	0.072	-0.0009
46DDCL	58800000	28,308	28,366	58	CQ	0.0973	0.0975	0.0002
46DDCY	58800000	5,939	5,952	12	CQ	0.0973	0.0975	0.0002
46DDSK	58800000	9,438	9,457	19	CQ	0.0973	0.0975	0.0002
46DM01	58800000	99,031	102,150	3,119	NL	0.0508	0.0524	0.0016
46EZBL	90700000	20,616	20,658	42	CQ	0.0973	0.0975	0.0002
46GI01	58800000	205,592	205,985	393	A0	0.0729	0.072	-0.0009
46GI09	58800000	129,537	129,785	248	A0	0.0729	0.072	-0.0009
46GI8H	58800000	21,096	20,836	(260)	A0	0.0729	0.072	-0.0009
46GI8I	58800000	641	633	(8)	A0	0.0729	0.072	-0.0009
46GI8L	58800000	15,996	15,798	(197)	A0	0.0729	0.072	-0.0009
46GI8S	58800000	29,160	28,800	(360)	A0	0.0729	0.072	-0.0009
46GI8T	58800000	6,707	6,624	(83)	A0	0.0729	0.072	-0.0009
46GIEG	58800000	8,314	8,330	16	A0	0.0729	0.072	-0.0009
46IDBL	90800000	12,130	11,981	(150)	A0	0.0729	0.072	-0.0009
46IDMU	90800000	1,463	1,445	(18)	A0	0.0729	0.072	-0.0009
46IDPR	90800000	6,338	6,260	(78)	A0	0.0729	0.072	-0.0009
46ITDN	30904810	3,500,674	3,492,718	(7,956)	NK	0.044	0.0439	-1E-04
46ITIA	30904810	169,771	169,385	(386)	NK	0.044	0.0439	-1E-04
46ITIE	92300700	154,681	154,329	(352)	NK	0.044	0.0439	-1E-04
46ITVN	30904810	250,357	249,788	(569)	NK	0.044	0.0439	-1E-04
46LRBL	90800000	19,395	19,435	40	CQ	0.0973	0.0975	0.0002
46MIPT	90800000	10,650	10,672	22	CQ	0.0973	0.0975	0.0002
46ORMT	92300700	10,951	11,971	1,019	H4	0.0634	0.0693	0.0059
46PD01	56000000	120,823	119,331	(1,492)	A0	0.0729	0.072	-0.0009
46PG09	90800000	1,324	1,328	4	C6	0.1015	0.1018	0.0003
46PGBL	90800000	7,615	7,637	23	C6	0.1015	0.1018	0.0003
46RDMC	58600000	10,251	10,272	21	CQ	0.0973	0.0975	0.0002



BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
46RDMN	58600000	8,497	8,514	17	CQ	0.0973	0.0975	0.0002
46RDPL	58600000	56,587	56,703	116	CQ	0.0973	0.0975	0.0002
46RDRE	58600000	363,567	364,314	747	CQ	0.0973	0.0975	0.0002
46RDRL	58600000	86	86	0	CQ	0.0973	0.0975	0.0002
46RDRS	58800000	8,061	8,078	17	CQ	0.0973	0.0975	0.0002
46RDSW	58600000	74,650	74,803	153	CQ	0.0973	0.0975	0.0002
46SBAS	30802600	15,484	15,293	(191)	A0	0.0729	0.072	-0.0009
46SBM1	30351000	1,350	1,333	(17)	A0	0.0729	0.072	-0.0009
46SNCC	50600000	2,673	2,926	253	GV	0.076	0.0832	0.0072
46STCP	30802600	844	846	2	CQ	0.0973	0.0975	0.0002
46TC02	58800000	106,548	106,769	222	CT	0.1443	0.1446	0.0003
46TC03	58800000	61,555	61,683	128	CT	0.1443	0.1446	0.0003
46TP19	56920000	683	675	(8)	A0	0.0729	0.072	-0.0009
46TPAS	56920000	82,738	81,717	(1,021)	A0	0.0729	0.072	-0.0009
46TPE1	56920000	145	143	(2)	A0	0.0729	0.072	-0.0009
46TPK1	56920000	373	369	(5)	A0	0.0729	0.072	-0.0009
46TPQR	30802600	1,914	1,890	(24)	A0	0.0729	0.072	-0.0009
46TPT1	56000000	888	877	(11)	A0	0.0729	0.072	-0.0009
46TPV1	56920000	1,853	1,831	(23)	A0	0.0729	0.072	-0.0009
46TPVS	56000000	693	685	(9)	A0	0.0729	0.072	-0.0009
470101	50000000	95,646	90,885	(4,761)	A1	0.0663	0.063	-0.0033
470401	92300700	65,345	71,036	5,690	GW	0.0712	0.0774	0.0062
470501	92300700	30,361	33,004	2,644	GW	0.0712	0.0774	0.0062
470601	92300700	244,667	265,972	21,305	GW	0.0712	0.0774	0.0062
470A01	92300700	53,729	58,408	4,679	GW	0.0712	0.0774	0.0062
470B01	92300700	132,499	143,988	11,489	GX	0.0715	0.0777	0.0062
470C01	92300700	103,607	112,629	9,022	GW	0.0712	0.0774	0.0062
471001	92300700	2,303	2,335	32	CK	0.058	0.0588	0.0008
471020	92300700	240	244	3	CK	0.058	0.0588	0.0008
4710PX	92300700	92,800	94,080	1,280	CK	0.058	0.0588	0.0008
4710ZY	92300700	53	54	1	CK	0.058	0.0588	0.0008
471201	92300700	659,214	722,361	63,147	GN	0.0724	0.08	0.0076
4712BF	92300700	13,738	15,180	1,442	GN	0.0724	0.08	0.0076
4712MC	92300700	39,399	43,535	4,136	GN	0.0724	0.08	0.0076
471501	92300700	99,954	109,529	9,575	GO	0.0689	0.0755	0.0066
4715AM	92300700	276	302	26	GO	0.0689	0.0755	0.0066
471601	92300700	30,205	32,872	2,666	GY	0.0793	0.0863	0.007
471601	92300700	217,417	237,649	20,233	GY	0.0793	0.0863	0.007
4716AI	92300700	8,597	9,397	800	GY	0.0793	0.0863	0.007
471701	92300700	121,065	133,190	12,125	H6	0.0669	0.0736	0.0067
471A52	92300700	135,649	137,494	1,846	C4	0.0588	0.0596	0.0008
471ABF	92300700	4,160	4,217	57	C4	0.0588	0.0596	0.0008
471AMU	92300700	3,929	3,982	53	C4	0.0588	0.0596	0.0008
471EGS	42650000	3,277	3,114	(163)	A1	0.0663	0.063	-0.0033
472101	92300700	123,504	125,217	1,713	CM	0.0721	0.0731	0.001
472101	92300700	121,649	123,327	1,678	CM	0.0721	0.0731	0.001
4721RA	92300700	6,239	6,326	87	CM	0.0721	0.0731	0.001
4721RM	92300700	68,635	69,587	952	CM	0.0721	0.0731	0.001

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
4721SI	92300700	7,313	7,415	101	CM	0.0721	0.0731	0.001
4721UD	92300700	9,957	10,095	137	CM	0.0721	0.0731	0.001
4721UL	92300700	2,175	2,205	30	CM	0.0721	0.0731	0.001
4721UM	92300700	4,785	4,851	66	CM	0.0721	0.0731	0.001
472701	92300700	2,816	3,080	264	GH	0.0671	0.0734	0.0063
472805	92300700	1,074	1,054	(20)	EY	0.0526	0.0516	-0.001
472811	92300700	39,044	38,302	(742)	EY	0.0526	0.0516	-0.001
472850	92300700	5,260	5,160	(100)	EY	0.0526	0.0516	-0.001
4728CM	92300700	358	351	(7)	EY	0.0526	0.0516	-0.001
4728EP	92300700	314	308	(6)	EY	0.0526	0.0516	-0.001
4728FE	92300700	475	466	(9)	EY	0.0526	0.0516	-0.001
4728PC	92300700	7,919	7,768	(151)	EY	0.0526	0.0516	-0.001
472B01	92300700	2,099	2,128	29	CM	0.0721	0.0731	0.001
472B01	92300700	31,952	32,386	435	CM	0.0721	0.0731	0.001
472BDE	92300700	11,972	12,138	166	CM	0.0721	0.0731	0.001
472BPL	92300700	825	836	11	CM	0.0721	0.0731	0.001
472D01	92300700	11,090	10,538	(552)	A1	0.0663	0.063	-0.0033
472EEP	50000000	69,976	69,976	-	HD	0.0626	0.0626	0
472EES	50000000	16,560	16,560	-	HD	0.0626	0.0626	0
472EF2	50000000	15,206	15,206	-	HD	0.0626	0.0626	0
472FCS	50100000	9,974	11,067	1,094	CP	0.0693	0.0769	0.0076
472GCO	50000000	12,876	12,876	-	HD	0.0626	0.0626	0
472GLG	50000000	2,763	2,763	-	HD	0.0626	0.0626	0
472GMA	50000000	13,849	13,849	-	HD	0.0626	0.0626	0
472GMB	50000000	13,849	13,849	-	HD	0.0626	0.0626	0
473001	92300700	148,914	161,780	12,867	GQ	0.0706	0.0767	0.0061
473001	92300700	1,012	1,100	88	GQ	0.0706	0.0767	0.0061
473201	92300700	31,725	34,677	2,952	H4	0.0634	0.0693	0.0059
4732SO	92300700	2,531	2,767	236	H4	0.0634	0.0693	0.0059
473401	92300700	141,368	138,681	(2,688)	EY	0.0526	0.0516	-0.001
4734CU	92300700	29,220	28,665	(556)	EY	0.0526	0.0516	-0.001
4734SB	92300700	12,328	12,093	(234)	EY	0.0526	0.0516	-0.001
4734SC	92300700	10,297	10,101	(196)	EY	0.0526	0.0516	-0.001
4734SS	92300700	76	75	(1)	EY	0.0526	0.0516	-0.001
4737AS	90800000	12,510	12,535	26	CQ	0.0973	0.0975	0.0002
4737CA	90800000	17,672	17,709	36	CQ	0.0973	0.0975	0.0002
4737ES	90800000	21,254	21,298	44	CQ	0.0973	0.0975	0.0002
473801	92300700	105,264	133,705	28,441	KA	0.0929	0.118	0.0251
473ECO	50000000	1,660	1,660	-	HD	0.0626	0.0626	0
473ECS	50000000	33,206	33,206	-	HD	0.0626	0.0626	0
473EGC	50000000	11,868	11,868	-	HD	0.0626	0.0626	0
473FGS	50100000	38,904	39,817	912	AB	0.0938	0.096	0.0022
474101	92300700	26,207	25,709	(498)	EY	0.0526	0.0516	-0.001
4741SR	92300700	723	709	(14)	EY	0.0526	0.0516	-0.001
474401	92300700	9,337	9,159	(178)	EY	0.0526	0.0516	-0.001
474401	92300700	8,526	9,326	800	EY	0.0526	0.0516	-0.001
4744ME	92300700	82,015	89,715	7,700	EY	0.0526	0.0516	-0.001
4744PR	92300700	131	143	12	EY	0.0526	0.0516	-0.001



BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
4744SH	92300700	17,048	16,724	(324)	EY	0.0526	0.0516	-0.001
4744TN	92300700	3,949	3,874	(75)	EY	0.0526	0.0516	-0.001
4744WW	92300700	21,680	23,715	2,035	EY	0.0526	0.0516	-0.001
474701	92300700	20,565	20,174	(391)	EY	0.0526	0.0516	-0.001
4748SR	90800000	23,218	23,266	48	CQ	0.0973	0.0975	0.0002
474901	42640000	19,482	19,748	266	CI	0.0586	0.0594	0.0008
474921	42640000	8,790	8,910	120	CI	0.0586	0.0594	0.0008
4749PC	42640000	21,413	21,705	292	CI	0.0586	0.0594	0.0008
474A01	92300700	36,550	37,048	497	C4	0.0588	0.0596	0.0008
474GBG	55700010	81,549	77,490	(4,059)	A1	0.0663	0.063	-0.0033
475001	42640000	85,487	86,654	1,167	CI	0.0586	0.0594	0.0008
475020	42640000	231,987	235,154	3,167	CI	0.0586	0.0594	0.0008
475021	42640000	168,211	170,508	2,296	CI	0.0586	0.0594	0.0008
475025	42640000	1,275	1,292	17	CI	0.0586	0.0594	0.0008
4750CD	42640000	3,020	3,061	41	CI	0.0586	0.0594	0.0008
475F01	55600010	3,088	2,934	(154)	A1	0.0663	0.063	-0.0033
476501	90800000	103,763	103,976	213	CQ	0.0973	0.0975	0.0002
476601	90800000	18,658	18,428	(230)	A0	0.0729	0.072	-0.0009
477T01	92300700	35,295	38,345	3,050	GQ	0.0706	0.0767	0.0061
478601	73700000	104,917	103,622	(1,295)	A0	0.0729	0.072	-0.0009
478801	92300700	50,031	50,031	-	HD	0.0626	0.0626	0
478B01	92300700	89,957	98,328	8,371	H4	0.0634	0.0693	0.0059
478E01	55700010	13,104	12,452	(652)	A1	0.0663	0.063	-0.0033
478F01	55700010	34,093	64,786	30,693	R3	0.0732	0.1391	0.0659
478L01	92300700	23,840	26,059	2,219	H4	0.0634	0.0693	0.0059
478LTA	92300700	401	438	37	H4	0.0634	0.0693	0.0059
4798SR	90800000	71,338	71,485	147	CQ	0.0973	0.0975	0.0002
479E01	50000000	2,772	2,737	(34)	A0	0.0729	0.072	-0.0009
47AJ01	90800000	116,875	117,115	240	CQ	0.0973	0.0975	0.0002
47AP01	92300700	470,880	515,490	44,610	GV	0.076	0.0832	0.0072
47APIE	92300700	2,087	2,285	198	GV	0.076	0.0832	0.0072
47BG01	92300700	89,990	99,002	9,012	H6	0.0669	0.0736	0.0067
47BG02	92300700	125,499	138,068	12,569	H6	0.0669	0.0736	0.0067
47BG03	92300700	147,715	162,508	14,794	H6	0.0669	0.0736	0.0067
47BGBW	92300700	21,303	23,437	2,134	H6	0.0669	0.0736	0.0067
47BGT1	92300700	62,022	68,233	6,211	H6	0.0669	0.0736	0.0067
47BGT9	92300700	6,017	6,620	603	H6	0.0669	0.0736	0.0067
47BGTA	92300700	4,734	5,208	474	H6	0.0669	0.0736	0.0067
47BGTB	92300700	39,220	43,148	3,928	H6	0.0669	0.0736	0.0067
47BGTC	92300700	11,050	12,157	1,107	H6	0.0669	0.0736	0.0067
47BGTE	92300700	501	551	50	H6	0.0669	0.0736	0.0067
47BGTF	92300700	13,802	15,185	1,382	H6	0.0669	0.0736	0.0067
47BGTH	92300700	4,018	4,420	402	H6	0.0669	0.0736	0.0067
47BGTN	92300700	8,259	9,086	827	H6	0.0669	0.0736	0.0067
47BGTO	92300700	373,866	411,309	37,442	H6	0.0669	0.0736	0.0067
47BGTP	92300700	141,179	155,318	14,139	H6	0.0669	0.0736	0.0067
47BGTR	92300700	97	107	10	H6	0.0669	0.0736	0.0067
47BGTS	92300700	8,703	9,575	872	H6	0.0669	0.0736	0.0067

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
47BGTT	92300700	2,955	3,251	296	H6	0.0669	0.0736	0.0067
47BGTV	92300700	21,686	23,857	2,172	H6	0.0669	0.0736	0.0067
47BGTX	92300700	14,174	15,593	1,419	H6	0.0669	0.0736	0.0067
47BGTZ	92300700	4,465	4,913	447	H6	0.0669	0.0736	0.0067
47BGX1	92300700	11,253	12,380	1,127	H6	0.0669	0.0736	0.0067
47BGZ1	92300700	6,774	7,452	678	H6	0.0669	0.0736	0.0067
47BGZ2	92300700	17,584	19,345	1,761	H6	0.0669	0.0736	0.0067
47BGZ3	92300700	48,917	53,816	4,899	H6	0.0669	0.0736	0.0067
47BGZ4	92300700	30,017	33,023	3,006	H6	0.0669	0.0736	0.0067
47BGZ5	92300700	46,873	51,567	4,694	H6	0.0669	0.0736	0.0067
47CMGA	92300700	91,504	89,764	(1,740)	EY	0.0526	0.0516	-0.001
47CMTS	92300700	2,679	2,629	(51)	EY	0.0526	0.0516	-0.001
47CMWE	92300700	20,353	19,967	(387)	EY	0.0526	0.0516	-0.001
47CN40	92300700	48,122	47,207	(915)	EY	0.0526	0.0516	-0.001
47CN41	92300700	17,660	17,324	(336)	EY	0.0526	0.0516	-0.001
47CN42	92300700	790	775	(15)	EY	0.0526	0.0516	-0.001
47CN43	92300700	2,446	2,400	(47)	EY	0.0526	0.0516	-0.001
47CN60	92300700	5,880	5,768	(112)	EY	0.0526	0.0516	-0.001
47CN70	92300700	2,864	2,810	(54)	EY	0.0526	0.0516	-0.001
47CNPP	92300700	2,194	2,152	(42)	EY	0.0526	0.0516	-0.001
47CO01	50000000	21,276	21,276	-	HD	0.0626	0.0626	0
47CONL	50000000	3,107	3,107	-	HD	0.0626	0.0626	0
47CONT	50000000	874	874	-	HD	0.0626	0.0626	0
47COTF	50000000	2,645	2,645	-	HD	0.0626	0.0626	0
47CTMS	92300700	34,520	33,864	(656)	EY	0.0526	0.0516	-0.001
47EA01	92300700	16,100	17,612	1,512	GH	0.0671	0.0734	0.0063
47EN01	92300700	56,433	61,731	5,298	GH	0.0671	0.0734	0.0063
47EOT1	73700000	40,722	44,579	3,857	GV	0.076	0.0832	0.0072
47ERDM	92300700	1,315	1,290	(25)	EY	0.0526	0.0516	-0.001
47ERER	92300700	76,784	75,324	(1,460)	EY	0.0526	0.0516	-0.001
47ERFS	92300700	47,437	46,535	(902)	EY	0.0526	0.0516	-0.001
47ERIG	92300700	44,753	43,902	(851)	EY	0.0526	0.0516	-0.001
47ERSX	92300700	942	925	(18)	EY	0.0526	0.0516	-0.001
47FC01	92300700	127,164	141,109	13,946	CP	0.0693	0.0769	0.0076
47FG01	92300700	49,285	50,441	1,156	AB	0.0938	0.096	0.0022
47GL01	50600000	1,398	1,398	-	EN	0.0529	0.0529	0
47GN01	50600000	72,292	72,484	192	EM	0.0754	0.0756	0.0002
47GSTA	50600000	5,471	5,471	-	EN	0.0529	0.0529	0
47GX01	50000000	35,296	35,390	94	EM	0.0754	0.0756	0.0002
47HC60	92300700	40,612	39,840	(772)	EY	0.0526	0.0516	-0.001
47HR01	92300700	128,595	126,150	(2,445)	EY	0.0526	0.0516	-0.001
47HRAS	92300700	145	143	(3)	EY	0.0526	0.0516	-0.001
47HRCB	92300700	2,883	2,829	(55)	EY	0.0526	0.0516	-0.001
47HRDM	92300700	772	757	(15)	EY	0.0526	0.0516	-0.001
47HRER	92300700	512	503	(10)	EY	0.0526	0.0516	-0.001
47HRIT	92300700	11,989	11,761	(228)	EY	0.0526	0.0516	-0.001
47HRLD	92300700	451	442	(9)	EY	0.0526	0.0516	-0.001
47HRLM	92300700	15,577	15,281	(296)	EY	0.0526	0.0516	-0.001

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
47HRSC	92300700	24,499	24,033	(466)	EY	0.0526	0.0516	-0.001
47HRTA	92300700	8,104	7,950	(154)	EY	0.0526	0.0516	-0.001
47HRWF	92300700	3,847	3,773	(73)	EY	0.0526	0.0516	-0.001
47HRWP	92300700	26,803	26,294	(510)	EY	0.0526	0.0516	-0.001
47HRWS	92300700	31,365	30,768	(596)	EY	0.0526	0.0516	-0.001
47IM01	50600000	22,954	24,980	2,026	GY	0.0793	0.0863	0.007
47IMCM	50600000	14,272	15,532	1,260	GY	0.0793	0.0863	0.007
47IMDM	50600000	19,706	21,446	1,740	GY	0.0793	0.0863	0.007
47IMGP	50600000	3,382	3,680	299	GY	0.0793	0.0863	0.007
47IMLS	50600000	12,355	13,445	1,091	GY	0.0793	0.0863	0.007
47IMPG	50600000	1,514	1,648	134	GY	0.0793	0.0863	0.007
47IN01	90800000	5,249	5,184	(65)	A0	0.0729	0.072	-0.0009
47LD01	92300700	115,628	113,429	(2,198)	EY	0.0526	0.0516	-0.001
47LDEL	92300700	479	470	(9)	EY	0.0526	0.0516	-0.001
47LDEX	92300700	44	43	(1)	EY	0.0526	0.0516	-0.001
47LDKT	92300700	341	335	(6)	EY	0.0526	0.0516	-0.001
47LW01	92300700	108,713	118,919	10,207	GH	0.0671	0.0734	0.0063
47LWBL	93020000	6,865	7,509	645	GH	0.0671	0.0734	0.0063
47LWCT	92300700	4,558	4,986	428	GH	0.0671	0.0734	0.0063
47LWPB	92300700	457	500	43	GH	0.0671	0.0734	0.0063
47MI01	90800000	36,182	36,257	74	CQ	0.0973	0.0975	0.0002
47MICS	90800000	13,518	13,546	28	CQ	0.0973	0.0975	0.0002
47MNMP	90800000	123,225	123,478	253	CQ	0.0973	0.0975	0.0002
47PK11	92300700	263	258	(5)	EY	0.0526	0.0516	-0.001
47PN13	92300700	69,799	68,472	(1,327)	EY	0.0526	0.0516	-0.001
47PN20	92300700	11,300	11,085	(215)	EY	0.0526	0.0516	-0.001
47PN21	92300700	5,112	5,015	(97)	EY	0.0526	0.0516	-0.001
47PN22	92300700	1,812	1,777	(34)	EY	0.0526	0.0516	-0.001
47PN23	92300700	2,805	2,752	(53)	EY	0.0526	0.0516	-0.001
47PN45	92300700	1,315	1,290	(25)	EY	0.0526	0.0516	-0.001
47PY01	92300700	184,221	180,718	(3,502)	EY	0.0526	0.0516	-0.001
47PYSX	92300700	241	237	(5)	EY	0.0526	0.0516	-0.001
47PYXX	92300700	34,994	34,329	(665)	EY	0.0526	0.0516	-0.001
47PYZZ	92300700	77,858	76,378	(1,480)	EY	0.0526	0.0516	-0.001
47SC01	92300700	304,038	298,258	(5,780)	EY	0.0526	0.0516	-0.001
47SCDU	92300700	1,841	1,806	(35)	EY	0.0526	0.0516	-0.001
47SCWI	92300700	130,592	128,109	(2,483)	EY	0.0526	0.0516	-0.001
47SS01	92300700	39,218	38,473	(746)	EY	0.0526	0.0516	-0.001
47SSAD	92300700	9,468	9,288	(180)	EY	0.0526	0.0516	-0.001
47SSCR	92300700	54,325	53,292	(1,033)	EY	0.0526	0.0516	-0.001
47SSJS	92300700	46,807	45,917	(890)	EY	0.0526	0.0516	-0.001
47SSRL	92300700	10,718	10,514	(204)	EY	0.0526	0.0516	-0.001
47SSSTA	92300700	30,327	29,751	(577)	EY	0.0526	0.0516	-0.001
47SSWP	92300700	26,467	25,964	(503)	EY	0.0526	0.0516	-0.001
47SV01	92300700	104,247	102,265	(1,982)	EY	0.0526	0.0516	-0.001
47SVEC	92300700	276,455	271,199	(5,256)	EY	0.0526	0.0516	-0.001
47SVEF	92300700	2,630	2,580	(50)	EY	0.0526	0.0516	-0.001
47SVMP	92300700	5,040	4,944	(96)	EY	0.0526	0.0516	-0.001

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
47SVTS	92300700	12,624	12,384	(240)	EY	0.0526	0.0516	-0.001
47SVYT	92300700	7,627	7,482	(145)	EY	0.0526	0.0516	-0.001
47VS01	73700000	535	589	54	H6	0.0669	0.0736	0.0067
47VSES	92300700	70,183	77,212	7,029	H6	0.0669	0.0736	0.0067
47VSIM	50600000	100,639	110,718	10,079	H6	0.0669	0.0736	0.0067
47VSPP	50600000	15,680	17,251	1,570	H6	0.0669	0.0736	0.0067
47VSTB	50600000	1,380	1,519	138	H6	0.0669	0.0736	0.0067
47VSTH	92300700	24,458	26,907	2,449	H6	0.0669	0.0736	0.0067
47VSTM	92300700	379	417	38	H6	0.0669	0.0736	0.0067
47VSTR	50600000	2,460	2,706	246	H6	0.0669	0.0736	0.0067
47VSTS	50600000	3,685	4,054	369	H6	0.0669	0.0736	0.0067
47VSTT	50600000	349,071	384,030	34,959	H6	0.0669	0.0736	0.0067
47VSTX	50600000	13,072	14,381	1,309	H6	0.0669	0.0736	0.0067
47VSTZ	50600000	4,465	4,913	447	H6	0.0669	0.0736	0.0067
47VSX1	50600000	11,253	12,380	1,127	H6	0.0669	0.0736	0.0067
47VSZ1	50600000	6,575	7,233	658	H6	0.0669	0.0736	0.0067
47VSZ2	50600000	17,067	18,776	1,709	H6	0.0669	0.0736	0.0067
47VSZ3	50600000	48,917	53,816	4,899	H6	0.0669	0.0736	0.0067
47VSZ4	50600000	30,017	33,023	3,006	H6	0.0669	0.0736	0.0067
47VSZ5	92300700	46,873	51,567	4,694	H6	0.0669	0.0736	0.0067
47WP30	92300700	4,130	4,051	(79)	EY	0.0526	0.0516	-0.001
47ZN01	92300700	58,912	59,068	156	EM	0.0754	0.0756	0.0002
480G01	55700010	7,491	14,234	6,744	R3	0.0732	0.1391	0.0659
480G01	55700010	68,054	110,463	42,409	R3	0.0732	0.1391	0.0659
480GIM	55600010	6,490	12,332	5,842	R3	0.0732	0.1391	0.0659
480GIM	55600010	4,400	7,141	2,742	R3	0.0732	0.1391	0.0659
480GWC	55600010	3,879	6,296	2,417	R3	0.0732	0.1391	0.0659
480RFC	55700010	18,834	18,601	(233)	A0	0.0729	0.072	-0.0009
481BCA	42640000	772	712	(60)	S5	0.0772	0.0712	-0.006
481BCD	42650100	926	854	(72)	S5	0.0772	0.0712	-0.006
481BCS	42640000	772	712	(60)	S5	0.0772	0.0712	-0.006
481BET	42640000	463	427	(36)	S5	0.0772	0.0712	-0.006
4820ED	42650000	13,064	12,903	(161)	A0	0.0729	0.072	-0.0009
482BCC	42640000	386	356	(30)	S5	0.0772	0.0712	-0.006
482BCD	42640000	193	178	(15)	S5	0.0772	0.0712	-0.006
482BCS	92300700	5,790	5,340	(450)	S5	0.0772	0.0712	-0.006
482BMS	42640000	2,826	2,606	(220)	S5	0.0772	0.0712	-0.006
483101	92300700	34,618	37,609	2,991	GQ	0.0706	0.0767	0.0061
4831CO	92300700	14,521	15,776	1,255	GQ	0.0706	0.0767	0.0061
483BCA	42640000	10,036	9,256	(780)	S5	0.0772	0.0712	-0.006
483BCC	42610000	34,740	32,040	(2,700)	S5	0.0772	0.0712	-0.006
483BCD	42650100	1,544	1,424	(120)	S5	0.0772	0.0712	-0.006
483BCS	42640000	104,220	96,120	(8,100)	S5	0.0772	0.0712	-0.006
484BCA	42650100	772	712	(60)	S5	0.0772	0.0712	-0.006
484BCC	42650100	1,930	1,780	(150)	S5	0.0772	0.0712	-0.006
484BCS	42650100	772	712	(60)	S5	0.0772	0.0712	-0.006
485701	92300700	7,088	6,953	(135)	EY	0.0526	0.0516	-0.001
485BCC	42610000	772	712	(60)	S5	0.0772	0.0712	-0.006

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
485BCD	42650100	1,304	1,203	(101)	S5	0.0772	0.0712	-0.006
486016	92300700	211,049	203,829	(7,219)	SA	0.0877	0.0847	-0.003
486030	92300700	210,494	203,294	(7,200)	SA	0.0877	0.0847	-0.003
486040	92300700	233,068	225,095	(7,973)	SA	0.0877	0.0847	-0.003
486041	92300700	209,571	202,402	(7,169)	SA	0.0877	0.0847	-0.003
486060	92300700	207,376	200,283	(7,094)	SA	0.0877	0.0847	-0.003
486068	92300700	202,364	195,442	(6,922)	SA	0.0877	0.0847	-0.003
486070	92300700	213,922	206,604	(7,318)	SA	0.0877	0.0847	-0.003
489001	92300700	14,122	14,122	-	EO	0.0367	0.0367	0
489BCC	42650100	2,548	2,350	(198)	S5	0.0772	0.0712	-0.006
489BCD	42650100	3,011	2,777	(234)	S5	0.0772	0.0712	-0.006
489BET	42640000	6,049	5,579	(470)	S5	0.0772	0.0712	-0.006
48AP01	92300700	64	70	6	H6	0.0669	0.0736	0.0067
48APC1	30000000	303	333	30	H6	0.0669	0.0736	0.0067
48BSBT	92300700	10,003	9,813	(190)	EY	0.0526	0.0516	-0.001
48BSPI	92300700	86,524	84,880	(1,645)	EY	0.0526	0.0516	-0.001
48C201	92300700	66,178	64,920	(1,258)	EY	0.0526	0.0516	-0.001
48CBCA	42640000	1,776	1,638	(138)	S5	0.0772	0.0712	-0.006
48CS05	90300000	228,966	229,436	471	CQ	0.0973	0.0975	0.0002
48CS05	90300000	57,270	57,327	57	CQ	0.0973	0.0975	0.0002
48CS07	90300000	205,354	205,776	422	CQ	0.0973	0.0975	0.0002
48CS08	90300000	45,927	46,021	94	CQ	0.0973	0.0975	0.0002
48CSRS	90300000	221,522	221,977	455	CQ	0.0973	0.0975	0.0002
48DV01	92300700	50,146	49,193	(953)	EY	0.0526	0.0516	-0.001
48DVCO	92300700	24,867	24,395	(473)	EY	0.0526	0.0516	-0.001
48EA01	55600010	12,693	24,120	11,427	R3	0.0732	0.1391	0.0659
48EBCD	42650000	1,235	1,139	(96)	S5	0.0772	0.0712	-0.006
48EBET	42610000	1,800	1,660	(140)	S5	0.0772	0.0712	-0.006
48EEBL	42640000	66,600	85,650	19,050	HE	0.0444	0.0571	0.0127
48EEEA	42650000	208,867	268,610	59,743	HE	0.0444	0.0571	0.0127
48EEEE	50000000	11,100	14,275	3,175	HE	0.0444	0.0571	0.0127
48GBCA	42650000	12,043	11,107	(936)	S5	0.0772	0.0712	-0.006
48GBCC	42640000	13,911	12,830	(1,081)	S5	0.0772	0.0712	-0.006
48GBCD	42650100	2,108	1,944	(164)	S5	0.0772	0.0712	-0.006
48GBCO	42650100	386	356	(30)	S5	0.0772	0.0712	-0.006
48GBCT	42640000	386	356	(30)	S5	0.0772	0.0712	-0.006
48GBEC	42640000	1,266	1,168	(98)	S5	0.0772	0.0712	-0.006
48GBOG	42640000	2,200	2,029	(171)	S5	0.0772	0.0712	-0.006
48GBUW	42610000	10,654	9,826	(828)	S5	0.0772	0.0712	-0.006
48GL01	92300700	66	73	7	H6	0.0669	0.0736	0.0067
48GLC1	30000000	312	343	31	H6	0.0669	0.0736	0.0067
48GN01	92300700	351,525	384,203	32,678	H7	0.0753	0.0823	0.007
48GNC1	18600896	746,863	816,292	69,429	H7	0.0753	0.0823	0.007
48HBCC	42640000	772	712	(60)	S5	0.0772	0.0712	-0.006
48HBCD	42650100	2,084	1,922	(162)	S5	0.0772	0.0712	-0.006
48IG01	92300700	130,644	130,912	269	CQ	0.0973	0.0975	0.0002
48IGEC	90700000	41,226	41,310	85	CQ	0.0973	0.0975	0.0002
48IGEM	92300700	7,999	8,015	16	CQ	0.0973	0.0975	0.0002

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
48MS01	90700000	39,871	39,953	82	CQ	0.0973	0.0975	0.0002
48MSEC	90700000	21,099	21,143	43	CQ	0.0973	0.0975	0.0002
48SC01	92300700	666	728	62	H7	0.0753	0.0823	0.007
48SCC1	30000000	341	373	32	H7	0.0753	0.0823	0.007
48ST01	92300700	25,684	25,737	53	CQ	0.0973	0.0975	0.0002
490501	55600010	556,421	557,315	895	T1	0.0622	0.0623	0.0001
49053L	55600010	2,177	2,181	4	T1	0.0622	0.0623	0.0001
4905BA	55600010	2,384	2,388	4	T1	0.0622	0.0623	0.0001
4905BU	55600010	638	639	1	T1	0.0622	0.0623	0.0001
4905DM	56920000	7,924	7,937	13	T1	0.0622	0.0623	0.0001
4905GC	56920000	5,690	5,699	9	T1	0.0622	0.0623	0.0001
4905GV	56920000	2,002	2,006	3	T1	0.0622	0.0623	0.0001
4905OT	55600010	96,947	97,103	156	T1	0.0622	0.0623	0.0001
4905RN	56130000	7,008	7,019	11	T1	0.0622	0.0623	0.0001
4905SA	56140000	1,499	1,501	2	T1	0.0622	0.0623	0.0001
4905SM	55600010	105,379	105,548	169	T1	0.0622	0.0623	0.0001
4905TD	56130000	3,808	3,814	6	T1	0.0622	0.0623	0.0001
4905TM	56110000	40,265	40,330	65	T1	0.0622	0.0623	0.0001
4905TO	56130000	11,653	11,672	19	T1	0.0622	0.0623	0.0001
4905TS	55600010	327	328	1	T1	0.0622	0.0623	0.0001
4905W1	56910000	4,015	4,021	6	T1	0.0622	0.0623	0.0001
4905W2	56910000	2,008	2,011	3	T1	0.0622	0.0623	0.0001
4905W3	56910000	691	692	1	T1	0.0622	0.0623	0.0001
490C01	55700010	838	828	(10)	A0	0.0729	0.072	-0.0009
490D01	55700010	151,437	143,900	(7,538)	A1	0.0663	0.063	-0.0033
490D09	55700010	8,011	7,612	(399)	A1	0.0663	0.063	-0.0033
490D11	55700010	67,588	64,224	(3,364)	A1	0.0663	0.063	-0.0033
490DCN	55700010	11,041	10,491	(550)	A1	0.0663	0.063	-0.0033
490DEM	55700010	54,337	51,632	(2,705)	A1	0.0663	0.063	-0.0033
490DFD	55600010	198,919	189,018	(9,901)	A1	0.0663	0.063	-0.0033
490DGS	55700010	78,330	74,431	(3,899)	A1	0.0663	0.063	-0.0033
490DRG	55700010	22,498	21,378	(1,120)	A1	0.0663	0.063	-0.0033
490DS1	55700010	92,853	88,232	(4,622)	A1	0.0663	0.063	-0.0033
490DS4	55700010	17,752	16,869	(884)	A1	0.0663	0.063	-0.0033
490DTF	55700010	433	411	(22)	A1	0.0663	0.063	-0.0033
490DUC	55600010	155,823	148,067	(7,756)	A1	0.0663	0.063	-0.0033
490DUO	55700010	121,389	115,347	(6,042)	A1	0.0663	0.063	-0.0033
490EFR	50000000	8,702	8,269	(433)	A1	0.0663	0.063	-0.0033
490EGS	55700010	4,096	3,892	(204)	A1	0.0663	0.063	-0.0033
490EPA	55700010	10,550	10,025	(525)	A1	0.0663	0.063	-0.0033
490EPM	55700010	46,443	44,132	(2,312)	A1	0.0663	0.063	-0.0033
490EPO	55700010	11,744	11,160	(585)	A1	0.0663	0.063	-0.0033
490EPR	55700010	6,855	6,514	(341)	A1	0.0663	0.063	-0.0033
490EPT	55700010	24,623	23,398	(1,226)	A1	0.0663	0.063	-0.0033
490EST	55700010	17,154	16,300	(854)	A1	0.0663	0.063	-0.0033
490ETR	55700010	2,307	2,192	(115)	A1	0.0663	0.063	-0.0033
490G01	55600010	100,494	95,492	(5,002)	A1	0.0663	0.063	-0.0033
490GDX	55600010	318	302	(16)	A1	0.0663	0.063	-0.0033



BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
490GGS	55600010	28,741	27,310	(1,431)	A1	0.0663	0.063	-0.0033
490GIA	55600010	125	119	(6)	A1	0.0663	0.063	-0.0033
490GIS	55600010	51	49	(3)	A1	0.0663	0.063	-0.0033
490GTT	55600010	125	119	(6)	A1	0.0663	0.063	-0.0033
490MFC	55700010	300	570	270	R3	0.0732	0.1391	0.0659
490MSW	55700010	8,584	16,312	7,728	R3	0.0732	0.1391	0.0659
490REA	55700010	17,028	16,181	(848)	A1	0.0663	0.063	-0.0033
490T02	55700010	3,260	3,097	(162)	A1	0.0663	0.063	-0.0033
490T03	55700010	25,000	23,756	(1,244)	A1	0.0663	0.063	-0.0033
490TCE	55700010	5,793	5,505	(288)	A1	0.0663	0.063	-0.0033
490TET	55700010	94,651	89,940	(4,711)	A1	0.0663	0.063	-0.0033
490TMO	55700010	48,043	45,651	(2,391)	A1	0.0663	0.063	-0.0033
490TSD	55700010	132,679	126,075	(6,604)	A1	0.0663	0.063	-0.0033
490TTA	55700010	25,524	24,254	(1,270)	A1	0.0663	0.063	-0.0033
490TTM	55700010	51,838	49,258	(2,580)	A1	0.0663	0.063	-0.0033
491101	55600010	224,909	225,270	362	T1	0.0622	0.0623	0.0001
4911BA	55600010	2,384	2,388	4	T1	0.0622	0.0623	0.0001
4911CS	55600010	168,120	168,391	270	T1	0.0622	0.0623	0.0001
4911HW	56910000	112,287	112,467	181	T1	0.0622	0.0623	0.0001
4911IT	56910000	11,894	11,913	19	T1	0.0622	0.0623	0.0001
4911SW	56920000	186,662	186,962	300	T1	0.0622	0.0623	0.0001
491201	55600010	36,061	36,119	58	T1	0.0622	0.0623	0.0001
4912AT	55600010	111,514	111,693	179	T1	0.0622	0.0623	0.0001
4912BH	55600010	162,057	162,317	261	T1	0.0622	0.0623	0.0001
4912OC	55600010	110,140	110,317	177	T1	0.0622	0.0623	0.0001
491301	55600010	132,548	132,762	213	T1	0.0622	0.0623	0.0001
4913DR	55600010	436	437	1	T1	0.0622	0.0623	0.0001
4913PM	55600010	6,400	6,410	10	T1	0.0622	0.0623	0.0001
491401	55600010	108,296	108,470	174	T1	0.0622	0.0623	0.0001
4914DM	55600000	24,337	24,376	39	T1	0.0622	0.0623	0.0001
4914DR	55600010	436	437	1	T1	0.0622	0.0623	0.0001
492201	55600010	13,852	13,875	22	T1	0.0622	0.0623	0.0001
4922AM	55600010	41,584	41,651	67	T1	0.0622	0.0623	0.0001
4922EM	39140400	269,299	269,732	433	T1	0.0622	0.0623	0.0001
4922EX	55600010	124,400	124,600	200	T1	0.0622	0.0623	0.0001
4922PM	55600010	1,366	1,368	2	T1	0.0622	0.0623	0.0001
4922SX	55600010	32,688	32,740	53	T1	0.0622	0.0623	0.0001
493201	30802400	294,657	295,130	474	T1	0.0622	0.0623	0.0001
4932BA	30802400	720	721	1	T1	0.0622	0.0623	0.0001
4932BX	30802400	12,263	12,283	20	T1	0.0622	0.0623	0.0001
4932WS	30802400	8,998	9,013	14	T1	0.0622	0.0623	0.0001
493301	56000000	84,243	84,379	135	T1	0.0622	0.0623	0.0001
493371	56000000	436	437	1	T1	0.0622	0.0623	0.0001
4934RM	55700010	4,328	4,112	(215)	A1	0.0663	0.063	-0.0033
493601	55700010	6,367	6,289	(79)	A0	0.0729	0.072	-0.0009
4936IP	55700010	11,443	11,302	(141)	A0	0.0729	0.072	-0.0009
4936RE	55700010	16,349	16,147	(202)	A0	0.0729	0.072	-0.0009
4936RG	55700010	4,912	4,851	(61)	A0	0.0729	0.072	-0.0009

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
4936RP	55700010	129,572	127,972	(1,600)	A0	0.0729	0.072	-0.0009
4938RP	90700000	18,383	18,156	(227)	A0	0.0729	0.072	-0.0009
494101	50000000	212,594	202,013	(10,582)	A1	0.0663	0.063	-0.0033
494201	50000000	102,848	97,729	(5,119)	A1	0.0663	0.063	-0.0033
4944AM	50000000	84,238	83,198	(1,040)	A0	0.0729	0.072	-0.0009
4944AS	50000000	3,346	3,304	(41)	A0	0.0729	0.072	-0.0009
494501	50000000	73,982	73,069	(913)	A0	0.0729	0.072	-0.0009
4945FE	50000000	13,482	13,316	(166)	A0	0.0729	0.072	-0.0009
4945NS	50000000	3,051	3,014	(38)	A0	0.0729	0.072	-0.0009
4945NU	50000000	5,389	5,322	(67)	A0	0.0729	0.072	-0.0009
4945RN	90800000	54,113	53,445	(668)	A0	0.0729	0.072	-0.0009
4947GS	55700010	22,668	22,388	(280)	A0	0.0729	0.072	-0.0009
494901	50000000	60,132	59,389	(742)	A0	0.0729	0.072	-0.0009
495001	50000000	32,395	31,995	(400)	A0	0.0729	0.072	-0.0009
4951TD	50000000	46,459	44,147	(2,312)	A1	0.0663	0.063	-0.0033
4954CR	50000000	28,067	27,720	(347)	A0	0.0729	0.072	-0.0009
4954EV	50000000	1,094	1,080	(14)	A0	0.0729	0.072	-0.0009
4954FD	50000000	80,751	79,754	(997)	A0	0.0729	0.072	-0.0009
497501	30802400	67,134	67,242	108	T1	0.0622	0.0623	0.0001
497502	56000000	54,844	54,933	88	T1	0.0622	0.0623	0.0001
4975LB	42610000	1,089	1,090	2	T1	0.0622	0.0623	0.0001
4975LD	30802400	1,555	1,558	3	T1	0.0622	0.0623	0.0001
4975T1	30802400	12,729	12,749	20	T1	0.0622	0.0623	0.0001
4975T2	56000000	10,435	10,452	17	T1	0.0622	0.0623	0.0001
497701	56120000	29,009	29,056	47	T1	0.0622	0.0623	0.0001
4977BA	56120000	495	496	1	T1	0.0622	0.0623	0.0001
4977IC	56170000	5,935	5,944	10	T1	0.0622	0.0623	0.0001
4977NE	56150000	19,812	19,844	32	T1	0.0622	0.0623	0.0001
4977SC	56150000	3,834	3,840	6	T1	0.0622	0.0623	0.0001
4977TP	56150000	55,586	55,675	89	T1	0.0622	0.0623	0.0001
4977TR	56160000	33,865	33,919	54	T1	0.0622	0.0623	0.0001
4977TT	56130000	8,386	8,399	13	T1	0.0622	0.0623	0.0001
497801	56120000	8,174	8,187	13	T1	0.0622	0.0623	0.0001
4978BL	56120000	36,587	36,646	59	T1	0.0622	0.0623	0.0001
4978DR	56120000	638	639	1	T1	0.0622	0.0623	0.0001
4978IC	56120000	2,047	2,050	3	T1	0.0622	0.0623	0.0001
4978SX	56120000	940	941	2	T1	0.0622	0.0623	0.0001
4978TB	56120000	51,164	51,246	82	T1	0.0622	0.0623	0.0001
498001	56600000	28,433	28,478	46	T1	0.0622	0.0623	0.0001
4980AT	56600000	1,567	1,569	3	T1	0.0622	0.0623	0.0001
4980BU	56600000	20,702	20,735	33	T1	0.0622	0.0623	0.0001
4980CF	56600000	6,057	6,067	10	T1	0.0622	0.0623	0.0001
4980DB	56600000	1,672	1,675	3	T1	0.0622	0.0623	0.0001
4980FA	56600000	11,544	11,562	19	T1	0.0622	0.0623	0.0001
4980OM	56920000	15,300	15,324	25	T1	0.0622	0.0623	0.0001
4980OT	56600000	29,046	29,092	47	T1	0.0622	0.0623	0.0001
4980SX	56600000	676	677	1	T1	0.0622	0.0623	0.0001
4981ST	30802400	67	68	0	T1	0.0622	0.0623	0.0001



BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
498201	30802400	26,028	26,070	42	T1	0.0622	0.0623	0.0001
498202	56000000	21,296	21,330	34	T1	0.0622	0.0623	0.0001
498301	56000000	109,374	109,549	176	T1	0.0622	0.0623	0.0001
498401	56000000	10,446	10,463	17	T1	0.0622	0.0623	0.0001
4984FC	56000000	65,424	65,529	105	T1	0.0622	0.0623	0.0001
4984GC	56000000	21,376	21,410	34	T1	0.0622	0.0623	0.0001
4984OL	56000000	21,305	21,339	34	T1	0.0622	0.0623	0.0001
4985IC	56170000	23,325	23,363	38	T1	0.0622	0.0623	0.0001
4985TH	56130000	15,550	15,575	25	T1	0.0622	0.0623	0.0001
4985TP	56150000	77,750	77,875	125	T1	0.0622	0.0623	0.0001
4985TT	56130000	38,875	38,938	63	T1	0.0622	0.0623	0.0001
49EA01	55700010	35,076	33,330	(1,746)	A1	0.0663	0.063	-0.0033
49PB02	55600010	2,048	1,946	(102)	A1	0.0663	0.063	-0.0033
49PBDX	55600010	472	449	(24)	A1	0.0663	0.063	-0.0033
49PBG1	55600010	6,585	6,257	(328)	A1	0.0663	0.063	-0.0033
49PBIA	55700010	38,514	36,597	(1,917)	A1	0.0663	0.063	-0.0033
49PBIC	55700010	44,536	42,319	(2,217)	A1	0.0663	0.063	-0.0033
49PBIR	55600010	3,880	3,687	(193)	A1	0.0663	0.063	-0.0033
49PBIS	55600010	28,152	26,751	(1,401)	A1	0.0663	0.063	-0.0033
49SW01	55700010	56,172	106,742	50,570	R3	0.0732	0.1391	0.0659
49SWCC	55700010	747	1,419	672	R3	0.0732	0.1391	0.0659
49SWCD	55700010	307	584	277	R3	0.0732	0.1391	0.0659
49SWCE	42650000	9,809	18,639	8,831	R3	0.0732	0.1391	0.0659
49SWCS	55700010	44,869	85,263	40,394	R3	0.0732	0.1391	0.0659
49SWWP	55700010	2,868	5,450	2,582	R3	0.0732	0.1391	0.0659
4CAS01	92300700	519	567	48	H4	0.0634	0.0693	0.0059
4CCP01	50600002	219,195	549,469	330,274	HF	0.0444	0.1113	0.0669
4Q0DDR	55700010	11,144	10,590	(555)	A1	0.0663	0.063	-0.0033
4Q0DSP	55700010	104,551	99,347	(5,204)	A1	0.0663	0.063	-0.0033
4Q0GBI	55600010	120,682	195,885	75,204	R2	0.0475	0.0771	0.0296
4Q0PBI	55700010	27,623	26,248	(1,375)	A1	0.0663	0.063	-0.0033
4Q0PDR	55700010	4,393	4,174	(219)	A1	0.0663	0.063	-0.0033
4Q1D01	55700010	63,616	60,450	(3,166)	A1	0.0663	0.063	-0.0033
4Q1G01	55700010	56,507	53,695	(2,813)	A1	0.0663	0.063	-0.0033
4Q5101	50100000	21,161	23,482	2,321	CP	0.0693	0.0769	0.0076
4Q51AM	50100000	20,850	23,136	2,287	CP	0.0693	0.0769	0.0076
4Q51RC	50100000	27,975	31,043	3,068	CP	0.0693	0.0769	0.0076
4Q51T2	50100000	13,866	15,386	1,521	CP	0.0693	0.0769	0.0076
4Q51T4	50100000	14,884	16,516	1,632	CP	0.0693	0.0769	0.0076
4Q51T5	50100000	153,752	170,614	16,862	CP	0.0693	0.0769	0.0076
4Q51TF	50100000	2,429	2,695	266	CP	0.0693	0.0769	0.0076
4Q5201	50100000	44,128	45,163	1,035	AB	0.0938	0.096	0.0022
4Q52GM	54700000	14,203	14,536	333	AB	0.0938	0.096	0.0022
4Q52T4	54700000	8,883	9,091	208	AB	0.0938	0.096	0.0022
4Q52TF	54700000	1,449	1,483	34	AB	0.0938	0.096	0.0022
4QAS01	50000000	113,908	113,908	-	HC	0.0774	0.0774	0
4QASMX	50000000	8,348	8,348	-	HC	0.0774	0.0774	0
4QAST1	50000000	33,080	33,080	-	HC	0.0774	0.0774	0

BWO	FercSub	SCS Budget	SCS Budget	Variance	AI	Allocation Rate	Allocation Rate	Variance
		Using 2009	Using 2010			Using 2009	Using 2010	
		Statistics	Statistics			Statistics	Statistics	
4QASTT	50000000	137,312	137,312	-	HC	0.0774	0.0774	0
4QASTX	50000000	22	22	-	HC	0.0774	0.0774	0
4QASZ1	50000000	2,536	2,536	-	HC	0.0774	0.0774	0
4QASZ2	50000000	6,582	6,582	-	HC	0.0774	0.0774	0
4QFAPS	50100000	2,534	2,782	247	GP	0.084	0.0922	0.0082
4QFHAS	50000000	58,175	58,175	-	HC	0.0774	0.0774	0
4QFHAW	50000000	1,648	1,648	-	HC	0.0774	0.0774	0
4QFHCL	50000000	6,105	6,105	-	HC	0.0774	0.0774	0
4QFHPM	50000000	7,375	7,375	-	HC	0.0774	0.0774	0
4QFHSP	50000000	4,957	4,957	-	HC	0.0774	0.0774	0
4QFHSX	50000000	1,872	1,872	-	HC	0.0774	0.0774	0
4QFHVE	50000000	3,562	3,562	-	HC	0.0774	0.0774	0
4QFHVS	50000000	7,220	7,220	-	HC	0.0774	0.0774	0
4QFHWP	50000000	5,796	5,796	-	HC	0.0774	0.0774	0
4QGG01	50000000	53,190	50,543	(2,647)	A1	0.0663	0.063	-0.0033
4QPRC1	30351000	328	328	-	HC	0.0774	0.0774	0
4QPRGE	50000000	656	656	-	HC	0.0774	0.0774	0
4QSO01	50600000	6,908	6,908	-	HC	0.0774	0.0774	0
4SGGCP	30802600	102,197	102,407	210	CQ	0.0973	0.0975	0.0002
4SGGNB	56800000	1,964	1,968	4	CQ	0.0973	0.0975	0.0002
4SOG01	56800000	218,225	218,673	449	CQ	0.0973	0.0975	0.0002
4T4001	56600000	5,759	5,768	9	T1	0.0622	0.0623	0.0001
4T4201	30802600	69,304	69,415	111	T1	0.0622	0.0623	0.0001
4T4401	30802600	34,620	34,676	56	T1	0.0622	0.0623	0.0001
4T5001	56600000	4,747	4,755	8	T1	0.0622	0.0623	0.0001
4T5201	30802600	2,711	2,715	4	T1	0.0622	0.0623	0.0001
4T5401	30802600	40,747	40,813	66	T1	0.0622	0.0623	0.0001
4T6201	30802600	12,659	12,680	20	T1	0.0622	0.0623	0.0001
4T6401	30802600	11,441	11,459	18	T1	0.0622	0.0623	0.0001
4T7001	56600000	5,291	5,300	9	T1	0.0622	0.0623	0.0001
4T700P	56600000	27,006	27,050	43	T1	0.0622	0.0623	0.0001
4T7201	30802600	22,491	22,527	36	T1	0.0622	0.0623	0.0001
4T7401	30802600	130,669	130,879	210	T1	0.0622	0.0623	0.0001
4T740P	30802600	33,008	33,061	53	T1	0.0622	0.0623	0.0001
		<b>\$ 40,018,570</b>	<b>\$ 41,281,113</b>	<b>\$ 1,262,542</b>				

**Justification of Selected Work Orders**

Work Order 46EZBL includes the license, IT labor, and resource usage of the eGain purchased software package. The eGain software package is an email response management system that controls the flow of mail and communications through the Company's websites. For example, when a customer requests information through www.gulfpower.com, eGain routes the request to the proper department. The CQ (Customer) allocation factor is used to allocate these expenses to Alabama, Georgia, Gulf and Mississippi. The allocation rate of 0.0973 was applied to the total cost of this work order to produce Gulf's 2012 requested amount of \$20,616.

Work Order 46IDMU includes the IT labor and resource usage related to Load Data Analysis (LDA) database support. LDA collects meter data, such as recording metering, weather, interval, Customer Base Load (CBL), system hourly load and substation data. This data is used for analysis and application reports for the calculation of billing rates. The A0 (Load) allocation factor is used to allocate these expenses to Alabama, Georgia, Gulf and Mississippi. The allocation rate of 0.0729 was applied to the total cost of this work order to produce Gulf's 2012 requested amount of \$1,463.

Work Order 46LRBL includes the licenses, IT Labor and resource usage related to Oracle Utilities Rate Manager (Rate Expert) purchased software package. It provides an automated system that integrates business functions and provides accuracy, timeliness, and competitive response of rate pricing, design and analysis. The CQ (Customer) allocation factor is used to allocate these expenses to Alabama, Georgia, Gulf and Mississippi. The allocation rate of 0.0973 was applied to the total cost of this work order to produce Gulf's 2012 requested amount of \$19,395.

Work Orders 47VSTH, 47VSES, 47VSZ5, 47VSTB & 47VSZ1 include the allocations of Enterprise Solutions Support (ESS) to Supply Chain Management (SCM) for support of Maximo, Inventory Management/Warehousing, Procure to Pay, Brainware and 3rd Party Support and application governance. Maximo is the asset management software used in the Company's warehouses. Procure to Pay is the process of procuring goods to the payment of services. Brainware includes a front-end imaging system and the initial work-flow system used for invoices, iExpense (procurement card transactions and personal expense application) and check requests. The H6 (Financial) allocation factor is used to allocate these expenses to Southern Company, Alabama Power, Georgia Power, Gulf Power, Mississippi Power, SEGCO, Southern Nuclear, Southern Holdings and Southern Company Services. The allocation rate of 0.0669 was applied to the total cost of this work order to produce Gulf's 2012 requested amount of \$149,469.

**Gulf Power Company**  
**Surge Product Impact on Return on Rate Base**  
**For the Test Year Ended 12/31/2012**  
**(Thousands of Dollars)**

	Jurisdictional Capital Structure (As Filed) (000's)	Add Back: Surge Product Rate Base (000's)	Jurisdictional Capital Structure (Revised) (000's)	Ratio %	Cost Rate %	Weighted Cost Rate (Revised) %
Long-Term Debt	658,459		658,459	39.25	5.48	2.15
Short-Term Debt	17,955		17,955	1.07	2.12	0.02
Preferred Stock	73,077		73,077	4.36	6.65	0.29
Common Equity	645,222	1,521 *	646,743	38.55	11.70	4.51
Customer Deposits	21,264		21,264	1.27	6.00	0.08
Deferred Taxes	257,098		257,098	15.33	0.00	0.00
Investment Credit - Zero Cost	2,929		2,929	0.17	8.45	0.01
<b>Total</b>	<b>1,676,004</b>		<b>1,677,525</b>	<b>100.00</b>		<b>7.06</b>

\*13MA Net Investment consistent with data provided in response to OPC Interrogatory 65.

**Gulf Power Company**  
**Impact on Revenue Request of Moving Surge Products/ Allconnect**  
**For the Test Year Ended 12/31/2012**  
**(Thousands of Dollars)**

	<u>As Filed</u>	<u>Surge Product Adjustment*</u>	<u>Revised</u>	<u>Revenue Req. Adjustment</u>
Jurisdictional Adjusted Rate Base	1,676,004	1,521	1,677,525	
Rate of Return on Rate Base Requested	<u>7.05%</u>		<u>7.06%</u>	
Jurisdictional Net Operating Income Required	118,158		118,433	
Jurisdictional Adjusted Net Operating Income Achieved	<u>60,955</u>	433	<u>61,388</u>	
Net Operating Income Deficiency	57,203		57,045	
Net Operating Income Multiplier	<u>1.634607</u>		<u>1.634607</u>	
Revenue Deficiency	<u>93,504</u>		<u>93,246</u>	<u>258</u>

\* Rate Base and NOI adjustments based on and consistent with data provided in OPC Interrogatory 65.

**Operations & Maintenance Expense**  
**2002-2010 (Excludes Clauses, Energy Services and Storm Surcharge Expenses)**  
(in dollars)

	2002	2003	2004	2005	2006	2007	2008	2009	2010
<b>Actual</b>	197,230,508	206,584,531	225,338,716	223,548,501	226,610,033	231,037,181	234,444,547	224,828,276	250,262,861
<b>Budget</b>	196,292,196	195,831,412	204,787,422	214,612,041	222,911,181	235,639,568	240,891,798	246,813,093	258,526,913
<b>Variance</b>	938,312	10,753,119	20,551,294	8,936,460	3,698,852	(4,602,387)	(6,447,251)	(21,984,817)	(8,264,052)
<b>% of Budget</b>	100%	105%	110%	104%	102%	98%	97%	91%	97%

**Gulf Power Company  
Hiring Lag**

	Average Turnover	Average # of Days to Hire	Average Salary	Average Hiring Lag
Covered	27	39	\$ 27,113	\$ 78,219
Exempt	37	50	\$ 82,002	\$ 415,627
Non-Exempt	23	47	\$ 39,455	\$ 116,852
				<u>\$ 610,697</u>

Average Hiring Lag	\$ 610,697
O&M Percentage	73.37%
Average Hiring Lag - O&M	<u>\$ 448,069</u>

Average Turnover details are shown below.

Average # of Day to Hire - based on data available from 2008-2010.

Average Salary - based on average salaries for 2011.

Employee Turnover *				
Year	Non-			Total
	Covered	Exempt	Exempt NC	
2008	40	40	24	104
2009	13	25	23	61
2010	28	47	22	97
Avg	27	37	23	87

\* Includes voluntary and involuntary terminations, retirements and transfers.