FILED DEC 19, 2013 DOCUMENT NO. 07529-13 FPSC - COMMISSION CLERK

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1	BEFORE THE													
2	FLORIDA PUBLIC SERVICE COMMISSION													
3	In the Matter o	of:												
4		DOCKET NO. 120311-GU												
5	DESCRIPTION FOR A													
6	PETITION FOR A	SITION												
7	ADJUSTMENT TO 1 ACQUISITION OF GAS COMPANY BY	INDIANTOWN												
8	PUBLIC UTILITIES COMPANY.													
9														
10														
11	PROCEEDINGS:	COMMISSION CONFERENCE AGENDA ITEM NO. 5												
12														
13	COMMISSIONERS PARTICIPATING:	CHAIRMAN RONALD A. BRISÉ COMMISSIONER LISA POLAK EDGAR												
14		COMMISSIONER ART GRAHAM												
15		COMMISSIONER EDUARDO E. BALBIS COMMISSIONER JULIE I. BROWN												
16	DATE:	Tuesday, December 17, 2013												
17	PLACE:	Betty Easley Conference Center Room 148												
18		4075 Esplanade Way Tallahassee, Florida												
19	REPORTED BY:													
20	REPORTED BI.	LINDA BOLES, CRR, RPR Official FPSC Reporter (850) 413-6734												
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CHAIRMAN BRISÉ: Moving on to number 5.

MR. TRUEBLOOD: Good morning, Commissioners.

Frank Trueblood with the Commission staff.

Item 5 addresses Florida Public Utility's request to record a positive acquisition adjustment associated with FPUC's acquisition of Indiantown Gas Company.

Based on the cost savings and the benefits that the company -- I'm sorry -- and the savings the company feels it will realize, as well as the benefits that the former Indiantown Gas customers are receiving since the acquisition, staff recommends the Commission allow FPUC to record a positive acquisition adjustment to be amortized over 15 years.

Staff notes that even with approval today, the Commission reserves the right to review these savings and benefits in the company's next rate case and, if warranted, may adjust or remove the acquisition adjustment in the future.

Representatives from the company and OPC are present to address the Commission, and staff is available to answer any questions.

CHAIRMAN BRISÉ: Thank you very much.

Commissioners?

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Commissioner Balbis.

COMMISSIONER BALBIS: Thank you, Mr. Chairman.

I have a few questions for staff. On page 6 of the recommendation in the third paragraph you discuss in looking at the five factors that we need to look at in approving a positive acquisition adjustment, you try to quantify the savings associated with the acquisition. And in that third paragraph you mention a -- two contracts; a three-year O&M agreement at \$50,000 per year, and also a consulting agreement at \$100,000 per year. And it's my understanding that agreement has not been renewed or has expired; is that correct?

MR. MAUREY: That's correct. The, the consulting agreement has expired. The O&M agreement is still in place.

COMMISSIONER BALBIS: Okay. And then in table 1-3 where you calculate the net savings or costs on page 11, was that \$100,000 that is not continuing, was that accounted for in this table?

MR. MAUREY: It's not recognized in this table, no.

COMMISSIONER BALBIS: Okay. And, and my concern is that if we can accurately reflect the expected savings associated with the acquisition in

order to support a positive acquisition adjustment, I
think it would be more appropriate. And I'm not sure -I assume the other Commissioners have the table that
staff put together, basically including that \$100,000 in
anticipated savings.

MS. CHRISTENSEN: Commissioners, if I may address that. This is part of the reason -- Patty Christensen with the Office of Public Counsel.

CHAIRMAN BRISÉ: Sure. Go right ahead.

MS. CHRISTENSEN: And Ms. Vandiver is also with me.

That was part of the reason we asked to speak today. We had asked the company to create a table that included the nonrenewal of those two contracts, the 150 and the \$350,000 contract, and what impact that would have on the cumulative savings and when that would take effect, which would reflect table 1-3. And I'm not sure if that's the schedule that staff handed out, but we do have a copy of that available. And if we can ask to hand that out.

And we also shared your concern, Commissioner Balbis, that those, according to table 1-3, the cumulative savings were not going to show up until the year about 2021. And so that's why we asked for this table to be drafted by the company. And it shows with

the elimination of those contracts that the cumulative savings to customers would be effective -- there would be net benefit to the customers showing 2014.

And we also had another issue that we wish to address in the drafting of the recommendation when the time is appropriate. Thank you.

CHAIRMAN BRISÉ: All right. Thank you.

Ms. Keating?

MS. KEATING: I just wanted to point out that Ms. Christensen is correct; we did prepare this at OPC's request. But I wanted to note the footnote here. We would caution, particularly with regard to the contract that is not yet terminated, the company really can't guarantee that those are exactly the savings that would show up upon termination of that contract. It is entirely possible that internal O&M costs may increase that could offset some of those potential savings.

We do agree that we think that savings will likely show up ahead of the schedule shown on page 11, but we just wanted to caution, particularly with regard to the contract that is not yet terminated, that some of those savings may be offset.

CHAIRMAN BRISÉ: Okay. The floor is yours.

COMMISSIONER BALBIS: And I have a question then or clarification from the Office of Public Counsel.

So this table here has both the \$100,000 consulting agreement and the \$50,000 O&M agreement; is that correct? Or I could ask the utilities.

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MS. CHRISTENSEN: Yeah. The utility prepared it. I believe it contains the -- I think it contains both of those contracts not being renewed. But for clarification, I would ask the company because they can tell you exactly when they put those nonrenewals into the chart. I think it reflects both and that's what we had asked them to do.

SPEAKER: That's correct. If you'll note, there's a separate line item for the savings expiration of the contracts with a star footnoting. We have reflected the consulting agreement expiring July 31st, 2013, and the O&M agreement expiring July 2014.

CHAIRMAN BRISÉ: Okav.

COMMISSIONER BALBIS: Mr. Chairman, let me just tell you where my thoughts are on this. We have to look at five factors in considering a positive acquisition adjustment. And all of those factors really are a benefit to the customers, whether it's increased quality of service, lower operating costs, ability to attract capital, overall cost of capital, and managerial experience. And I want to make sure that we're accurately reflecting all the savings that customers are

getting from this.

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And in looking at what staff has put together, which simply had the \$100,000 contract which was, which has expired and not the full, excuse me, \$150,000, but just the \$100,000, the result is that the customers will be realizing the savings in 2014, which is just a few weeks away.

And this Commission, I believe it was December of 2011, when considering and approving a positive acquisition adjustment for, I believe it was Chesapeake Utilities, one of the concerns that I had that was really alleviated in that case was that with that adjustment, even with that adjustment the savings associated with it would kick in in January, in that case, 2012. So -- which alleviated my concerns that customers do get a benefit from the acquisition since we do not have merger authority.

I want to make sure that we're accurately reflecting the savings to the customers so that we can decide whether or not that it's a benefit and the acquisition adjustment is appropriate. I think the \$100,000 -- it's not the full \$150,000, and I understand that -- I agree with the utility. Maybe you're not sure of what the savings will be. But I think the \$100,000 is a little closer to what the benefits will be. And

with that, I see that the customers will realize savings 1 just in the next few weeks in 2014. So I'd like to hear 2 from -- if my other colleagues have any comments on it. 3 CHAIRMAN BRISÉ: All right. Commissioners, 4 5 any comments? Commissioner Graham. 6 7 COMMISSIONER GRAHAM: Well, I just don't have the other chart that Commissioner Balbis is talking 8 9 about. I don't know if --MR. MAUREY: We'll have a copy of the analyses 10 he's referring to passed out now. 11 12 COMMISSIONER BROWN: Can you also have it 13 provided by email? 14 CHAIRMAN BRISÉ: Okay. We'll work on that and 15 make sure that you have that. I think someone is going to send that to you 16 17 right now. Hitting send. 18 COMMISSIONER BROWN: Thank you. 19 CHAIRMAN BRISÉ: All right. COMMISSIONER EDGAR: While you're passing that 20 21 out, if you have an extra, I'll take it too, because the 22 one I have up here is much smaller print. Thank you. 23 CHAIRMAN BRISÉ: Commissioner Edgar. 24 COMMISSIONER EDGAR: Thank you. 25 Mr. Chairman, while, while this has been just

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passed out and we're taking a moment to look at it -and I did have it and this is a little easier to read,
so thank you for that.

Commissioner Balbis, could you point me again, now that I do have it in bigger print, where it is in particular or what it is you're trying to draw our attention to?

COMMISSIONER BALBIS: Sure. And maybe the best way to start is page 11 on the recommendation on table 1-3. And staff put together, or the utility, I'm not sure who, a table of the net costs and benefits.

And according to that table, it isn't until 2021 for the cumulative savings or costs, which is the last column, for customers to realize a savings associated with the acquisition.

And then if you look at the net costs, which is the third column, it's not until 2016. And that didn't include the \$100,000 or \$150,000. So looking at what staff put together with the \$100,000 savings which has expired and will be a savings to customers, if you look at the 2014 column, going to the cumulative savings, which is the last row, you see that's when there's an overall savings to customers is in 2014, which is just a few weeks away. And if you look at the net annualized savings, 2013.

So I think that accounting for that benefit of 1 2 not having that contract more accurately depicts the 3 overall savings to customers and gives me comfort that having that positive acquisition adjustment is going to 4 result in an overall benefit to customers. 5 CHAIRMAN BRISÉ: All right. Okay. 6 7 MS. CHRISTENSEN: Commissioner, there was another item. 8 9 CHAIRMAN BRISÉ: Yes. Let us, let us finish with this, with this item first. 10 11 MS. CHRISTENSEN: Okay. CHAIRMAN BRISÉ: Thank you. 12 13 Does the company wish to be heard? 14 COMMISSIONER BROWN: Mr. Chairman? CHAIRMAN BRISÉ: Yes, Commissioner Brown. 15 16 COMMISSIONER BROWN: Thank you. I would like 17 to have Mr. Maurey or Ms. Banks respond to some of these 18 concerns. CHAIRMAN BRISÉ: Mr. Maurey. 19 20 COMMISSIONER BROWN: Please. 21 MR. MAUREY: I'm not sure of the question. 22 23 COMMISSIONER BROWN: I thought I was being 24 pretty clear. 25 The concerns that are being addressed by

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Commissioner Balbis, I'd like you to respond to them, and Office of Public Counsel.

MR. MAUREY: Yes, ma'am. When staff did its analysis, it was based on audited materials for 2011 and 2012 where staff knew the costs and the savings, and that is the analysis that's reflected on page 11.

Now in 2013 the \$100,000 consulting agreement contract expired. It was not renewed. We did not know that until much later, so it's not reflected in this analysis. The company's representation that the \$100,000 is gone, it's appropriate to incorporate that into the analysis, and the savings are greater than were represented in the initial staff recommendation. We, we're in agreement with Commissioner Balbis' comments.

COMMISSIONER BROWN: Good. Thank you.

MR. MAUREY: And we can reflect that in the order.

COMMISSIONER BROWN: Very good.

CHAIRMAN BRISÉ: Okay. Ms. Keating.

MS. KEATING: I'm hesitant to even say anything, but we are somewhat more comfortable with staff's chart in view of the fact that that contract has terminated. But, I mean, there's still some possibility that there may be some offsetting costs that could slightly impact those savings. I just wanted to add

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that word of caution.

But again to note, as staff has noted, that, you know, the cost savings really shouldn't be looked at in isolation. I mean, there are going to be long-term benefits for the customers, and the Commission is always going to have the chance to go back and look at this again in the next rate case and to monitor the savings through the company's surveillance reports. Thank you.

CHAIRMAN BRISÉ: Thank you. Commissioners, any other issues that you would wish to address before we go to OPC?

Okay. Ms. Christensen.

MS. CHRISTENSEN: Thank you, Mr. Chairman. Ours is another hopefully just minor issue that we would like to address.

On page 4 of the recommendation, starting at line 2 in the first paragraph, it reads that the purchase price, which exceeds the book value by \$745,800, includes a non-compete agreement of 450,000, and then says, comma, a three-year operation and maintenance, O&M agreement of \$150,000 and a three-year consulting agreement of \$300,000. And then it goes on in the next sentence to say the company clarified in a response to staff data request that the consulting and O&M agreements were not included in the calculation of

the purchase premium.

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When we read those two sentences together, we thought it created confusion and -- because it's our understanding that the O&M, operation and maintenance agreements of 150,000 and the annual 100,000 or total 300,000 consulting contract were not part of the purchase price. And the way that it reads, in our minds it created some confusion. And, you know, years from now when we're going back to do a rate case, it may create confusion in the future. We thought that that would best be eliminated by striking the sentence after the comma and eliminating the remainder of that sentence as well as the third sentence, and then there would not be confusion when the next rate case comes into play, what was part of the purchase price and what is subject to the Commission's review as to whether or not the cost savings actually met part of the purchase price. Because the O&M contracts, based on our understanding, are a completely separate issue.

And so that was -- I think it's hopefully a relatively minor issue, but I think it would save us some confusion in the future when we have to address that in a future rate case.

CHAIRMAN BRISÉ: Okay. Thank you. Let's hear from staff. And I don't know if the company has an

opinion on that. But, staff, let's go with you first.

MR. MAUREY: Perhaps this sentence could be more artfully worded. We believe it's factually correct and the second sentence clarifies the meaning, but we're at the Commission's pleasure on that.

CHAIRMAN BRISÉ: Okay. Ms. Keating.

MS. KEATING: We're comfortable with however the Commission prefers to word it.

CHAIRMAN BRISÉ: Okay. All right.

Commissioners, any thoughts on, on that aspect that was brought up by the Office of Public Counsel?

Okay. All right. Commissioner Graham.

COMMISSIONER GRAHAM: No. I was just going to go back to Commissioner Balbis' chart. There's, there's really nothing that we need to do as far as amending this because that's all going to -- since the \$100,000 is out, that's all going to fall out when we revise this chart; is that correct? Staff or Commissioner Balbis.

MR. MAUREY: That's correct. We would -- the order will reflect that the savings is higher than what's reflected in the current recommendation before you.

COMMISSIONER GRAHAM: Commissioner Balbis, so basically all we really have to do is move staff recommendation on this item.

COMMISSIONER BALBIS: With the provision that 1 that table, if it is revised to reflect the \$100,000 and 2 3 shown in the order. COMMISSIONER GRAHAM: Second. 4 CHAIRMAN BRISÉ: All right. Let's -- I'm not 5 sure that that was a motion, so let's make sure we're 6 7 where we ought to be. Okay. Commissioner Balbis, let me recognize 8 9 you for a motion. COMMISSIONER BALBIS: Thank you, Mr. Chairman. 10 I move that we approve staff's recommendation 11 12 with the revisions to table 1-3 to reflect the \$100,000 savings associated with the contract expiration, and 13 also with the clarification of the sentence that the 14 Office of Public Counsel brought up concerning the book 15 value and the purchase price. 16 17 CHAIRMAN BRISÉ: Okay. There's a motion. there a second? 18 19 **COMMISSIONER GRAHAM:** Second. CHAIRMAN BRISÉ: Okay. It's been moved and 20 21 seconded. Further discussion. Any further discussion? 22 Okay. All in favor, say aye. 23 (Vote taken.) 24 (Agenda item concluded.) 25

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1	STATE OF FLORIDA) : CERTIFICATE OF REPORTER
2	COUNTY OF LEON)
3	
4	I, LINDA BOLES, CRR, RPR, Official Commission
5	Reporter, do hereby certify that the foregoing proceeding was heard at the time and place herein stated.
6	IT IS FURTHER CERTIFIED that I
7	stenographically reported the said proceedings; that the same has been transcribed under my direct supervision;
8	and that this transcript constitutes a true transcription of my notes of said proceedings.
9	I FURTHER CERTIFY that I am not a relative,
10	employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties'
11	attorney or counsel connected with the action, nor am I financially interested in the action.
12	DATED THIS 19th day of December,
13	2013.
14	Linda Boles
15	- Ginda Boles
16	LINDA BOLES, CRR, RPR FPSC Official Commission Reporters
17	(850) 413-6734
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	II

FLORIDA PUBLIC UTILITIES COMPANY - INDIANTOWN DIVISION CALCULATION OF ACQUISITION PREMIUM REVENUE REQUIREMENTS AND COMPARISON TO OPERATING SAVINGS

Revised Exhibit___(CM-4)

Revised Exhibit___(CM-4)
PROFORMA
Page 2 of 2

				20	010 _		2011	2	012	2	013	20	014	20	15	2016		2017	2	2018	2	2019		2020		2021		2022		2022		2023		2024
		\$ 745,800	Average Premii	\$ 73	15 AA2.	\$	700,223	\$ 6	50,503	\$ 6	00,783	\$ 55	1,063	\$ 501	,343	\$ 451,623	\$	4 01,90 3	\$ 3	52,183	\$ 3	802,463	\$ 2	252,743	\$ 2	203,023	\$	1 53,30 3	\$	103,583	\$	53,863	\$	14,502
		\$ -	Non-Deductible	\$		\$	-	\$		\$	-	\$	-	\$	-	\$ -	\$	-	\$		\$	-	\$		\$	-	\$		\$		\$	-	\$	
		\$ 745,800	Deductible	\$ 72	25,083	\$	675,363	\$ 6	25,643	\$ 5	75,923	\$ 52	26,203	\$ 476	,483	\$ 426,763	\$	377,043	\$ 3	27,323	\$ 2	277,603	\$ 2	227,883	\$ 1	178,163	\$	128,443	\$	78,723	\$	29,003	\$	0
	Cost		Weighted																															
	Rate	Ratio	Cost																															
Equity ·	11.50%	55.65%	6.40%		,	\$	44,813		41,631		38,449				,	\$ 28,903		25,721		22,539		19,357				12,993	\$	9,811	\$	-,	\$	3,447		541
LT Debt	5.91%	25.87%	1.79%	\$	5,478	\$	12,517	\$	11,629	\$	10,740		-,		,	\$ 8,073		7,184	\$	6,296	5	5,407	5	4,518	\$	3,629	\$	2,740	\$	1,852		963		151
LT Debt - Refinance	6.33%	3.15%	0.20%	\$	611		1,396	\$	1,297	\$	1,198	\$		\$ 1	,000	\$ 901		801	\$	702	\$	603	\$		\$		\$	306	\$	207		107		17
ST Debt	1.24%	5.72%	0.07%	\$	217	\$	497	\$	461	\$	426	\$	391	\$	356	\$ 320		285	\$	250	\$		\$		\$	144	\$	109	\$	73	\$	38	\$	6
Cust Deposits	6.57%	3.36%	0.22%	\$	676	\$	1,546	\$	1,436	\$	1,326	\$	1,216	\$ 1	,107	\$ 997	\$	887	\$	777	\$	668	\$	558	\$	448	\$	338	\$	229	\$	119	\$	19
Deferred Inc Tax	0.00%	211-2000	0.00%	\$		\$	-	\$		\$	-	\$	-	\$	-	\$ -	\$	-	\$	-	\$	-	\$		\$	*	\$	-	\$		\$	-	\$	-
Subtotal		100.00%	8.68%	\$ 2	26,594	\$	60,768	\$	56,454	\$	52,139	\$ 4	7,824	\$ 43	,509	\$ 39,194	\$	34,879	\$:	30,564	\$	26,249	\$	21,934	\$	17,619	\$	13,304	\$	8,989	\$	4,674	\$	734
Income Taxes		38.575%	4.02%	\$ 1	12,316	\$	28,142	\$	26,144	\$	24,146	\$ 2	22,148	\$ 20	,149	\$ 18,151	\$	16,153	\$	14,154	\$	12,156	\$	10,158	\$	8,160	\$	6,161	\$	4,163	\$	2,165	\$	340
Pre-tax Return on Capital			12.70%	\$ 3	38,909	\$	88,911	\$	82,598	\$	76,284	\$ 6	59,971	\$ 63	,658	\$ 57,345	\$	51,032	\$ 4	44,718	\$	38,405	\$	32,092	\$	25,779	\$	19,466	\$	13,152	\$	6,839	\$	1,074
Amortization Expense (tax	deductible			\$ 2	20,717	\$	49,720	\$	49,720	\$	49,720	\$ 4	19,720	\$ 49	,720	\$ 49,720	\$	49,720	\$ 4	49,720	\$	49,720	\$	49,720	\$	49,720	\$	49,720	\$	49,720	\$	49,720	\$	29,003
Amortization Expense (not	tax deduct	ible)		\$	-	\$	-	\$	-	\$		\$	-	\$		\$ -	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$		\$	-	\$	-
Tax Gross-up				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$ -	\$	•	\$	•	\$	٠	\$	•	\$		\$	-	\$	-	\$	-	\$	-
Revenue Requirement (Pro	emium)			\$ 5	59,626	\$	138,631	\$ 1	32,318	\$ 1	26,004	\$ 11	19,691	\$ 113	,378	\$ 107,065	\$	100,752	\$!	94,438	\$	88,125	\$	81,812	\$	75,499	\$	69,186	\$	62,872	\$	56,559	\$	30,077
Staff Calculations																																		
O&M Savings		0.00%		5 0	55.961	Ś	134,306	5 1	34,306	\$ 1	34,306	\$ 13	34,306	\$ 134	.306	\$ 134,306	Ś	134,306	\$ 13	34,306	\$ 1	34,306	\$ 1	134,306	\$ 1	134,306	\$	134,306	\$	134,306	\$	134,306	\$	78,345
less: Increase Income Tax	Date (18 90				10,576)		(25,384)		25,384)		25,384)		,	\$ (25		\$ (25,384		(25,384)	\$ (\$				Ś	(25,384)		(25,384)		(25,384)
Cost of Capital Savings	Hane (TO:20	0.00%		\$ 1.	923		2,215	\$		\$	2.215		, , ,		,,	\$ 2,215					\$. , ,	\$. , ,	\$		\$	2,215	Ś	2,215	-		\$	1,292
Savings-Expiration of Conf	rarte *	0.00,0		5	-	Ś	-,	Ś	_,		41.667		20,833	\$ 150	.000	\$ 150,000		150.000	\$ 1	50,000	\$ 1	50,000	\$ 1	150,000	\$ 1	150,000	\$:	150,000	\$	150,000			\$	150.000
Income Taxes on Expired (38.575%		\$	-	\$		\$	-				,		,	\$ (57,863) \$		-		\$ ((57,863)	\$	(57,863)	\$	(57,863)	\$	(57,863)	\$	(57,863)		(57,863)		(57,863)
Total Q & M Savings				\$ 4	46,308	\$	111,137	\$ 1	11,137	\$ 1	36,731	\$ 18	35,359	\$ 203	,274	\$ 203,274	\$	203,274	\$ 20	03,274	\$ 2	03,274	\$ 2	203,274	\$ 2	203,274	\$:	203,274	\$	203,274	\$	203,274	\$	146,390
Net Annual Savings				\$ (1	13,318)	\$	(27,494)	\$ (21,180)	\$	10,727	\$ 6	55,668	\$ 89	,896	\$ 96,209	\$	102,523	\$ 10	08,836	\$ 1	15,149	\$ 1	121,462	\$ 1	127,775	\$:	134,089	\$	140,402	\$	146,715	\$	116,313
Cumulative Savings				\$ (1	13,318)	Ś	(40,812)	\$ (61,992)	\$ (51,265)	\$ 1	14,403	\$ 104	,299	\$ 200,508	\$	303,031	\$ 4:	11,867	\$ 5	27,016	\$ 6	648,478	\$ 7	776,253	\$!	910,342	\$ 1,	050,744	\$	1,197,459	\$ 1,	313,772

^{*} Reflects the expiration of the two Indiantown Agreements. The Consulting agreement (\$8,333.33/month) expired July 31, 2013, which the Company did not renew and the O & M Agreement (\$4,166.67/month) also expired July 31, 2013, which was renewed for an additional year and is due to expire July 31, 2014. FPUC cautions that this schedule does not reflect any OM increases that may offset some of the contract savings. As such the revised savings outlined herein are for illustration purposes only, and do not include cost offsets.

