# Macfarlane Ferguson \& McMullen 

|  | ATTORNEYS AND COUNSELORS ATLAW |  |
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October 9, 1998

## VIA FEDERAL EXPRESS

Blanca S. Bayo, Director
Division of Records \& Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassec, FL 32399-0850
Re: Docket No. 980003-GU -- Purchased Gas Adjustment (PGA) Clause True-Up Projections and Testimony for January 1999. December 1999.

Dear Ms. Bayo:
Enclosed for filing in the above docket on behalf of Peoples Gas System, Inc. ("Peoples"). please find the original and 15 copies of its Petition for Approval of PGA Factor for Application to Bills to be Rendered During the Period January 1999 Through December 1999. 11339-98

Enclosed also for filing on behalf of Peoples, please find 15 copies of the Direct Testimony of W. Edward Elliott on behalf of Peoples, as well as 15 copies of Composite Exhibit EE-2 to Mr. Elliott's testimony.

Please acknowledge your receipt and filing of the enclosures by stamping the duplicate copy of this letter which is enclosed and ,eturning the same to the undersigned. Thank you tor your assistance.


## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

 PREPARED DIRECT TESTIMONYQ. Please state your name and business address.
A. My name is W. Edward Elliott. My business address is 702 N. Franklin Street, Tampa, Florida 33601.
Q. By whom are you employed and in what capacity?
A. I am Manager of Gas Accounting for Peoples Gas System. ("Peoples").
Q. Please summarize your Quiucational bz.ckground and professional qualifications.
A. I graduated from the University of South Florida in 1972 with the degree of Bachelor of Arts in Accounting. I have over 10 years of experience in the utility field.
Q. What are your primary responsibilities in your present position with Peoples?
A. As Manager of Gas Accounting, I am responsible for recording the Company's costs for natural gas and upstream pipeline capacity and preparing filings associated with the recovery of these costs through the Purchased Gas Adjustment ('PGA").
Q. Have you previously testified in regulatory proceedings?
A. Yes. I have submitted testimony on several occasions supporting Peoples' Purchased Gas Adjustment.
Q. What is the purpose of your testimony in this docket?
A. The purpose of my testimony is to describe generally the components of Peoples' cost of purchased gas and upstream pipeline capacity. In my testimony, I also explain how Peoples' projected weighted average cosh of gas ("WACOG") for the January 1999 through December 1993 period was determined and the resulting requested maximum PGA ("Cap").
Q. Please summarize your testimony.
A. I will address the following areas:

1. How Peoples will obtain its gas supplies during the projected period
2. Estimates and adjustments used to determine the amount of gas to be purchased from Peoples' various available sources of supply during the projected period
3. Projections and assumptions used to estimate the purchase price to be paid by Peoples for such gas supplies
4. The components and assumptions used to develop Schedules E-3 (A) through (G) of Composite Exhibit EE2
5. The components and assumptions used to develop Schedule E-1 of Composite Exhibit EE-2, including how Peoples' projected WACOG was determined
Q. Have you prepared or caused to be prepared certain schedules for use in this proceeding?
A. Yes. Composite Exhibit EB-2 was preparad by me or under my supervision.
Q. Please describe how Peoples will obtain its gas supplies during the profected period of January 1999 through December 1999.
A. All natural gas delivered through Peoples distribution system is received through two interstate pipelines. Gas
is delivered by Florida Gas Transmission Company ("FGT") and, in Peoples' Jacksonville Division, also by South Georgia Natural Gas Company ("South Georgia").
Q. In general, how does Peoples determine its sources of supply?
A. Peoples evaluates, selects and utilizes sources of natural gas supply on the basis of its "best value" gas acquisition strategy. For a source of supply to be identified as a "best value," it must offer the best combination of price, reliability of supply and dependable operations, consistent with Peoples' obligation as a public utility to provide safe, adequate and efficient service to the general public. Through a competitive bidding process, Peoples has developed, and is continuing to enhance, a portfolio of supply sources which reflect a balance between cost, reliability and operational flexibility. Peoples obtains its gas entirely as third party supplies which include both firm and interruptible purchases, various pricing mechanisms, and various purchase periods, including spot, short term and long term arrangements.
Q. Could Peoples purchase all third party supplies in advance for a long term at the lowest available fixed price in
order to provide increased stability to its cost of gas?
A. No. Peoples' quantity requirements for system supply gas at its gate stations vary significantly from year to year, season to season, month to month, and, in particular, from day to day. Often, the demand for gas on the Peoples system can vary dramatically within a month from the lowest to the highest requirement of its customers. In addition, Peoples transports more than 60\% of its throughput of gas for end-user customers who purchase their own supplies directly from producers and marketers. Peoples, therefore, receives large quantities of customer-owned gas at its city gate stations on a relatively uniform basis from day to day within a month. The actual takes of gas out of the Peoples system by those same transporting customers can, and do, vary significantly from day to day. Since a significant portion of the total throughput volumes is received by Peoples at a uniform daily rate, Peoples is forced to increase or decrease the purchases of its own system supply volumes by significant increments in order to maintain a balance between receipts and deliveries of gas each day. As a consequence, Peoples must buy a significant portion of its total system requirements under swing contract arrangement and meet extreme variations in delivered volumes by relying on swing gas, peaking gas, pipeline
balancing charge volumes, pipeline penalty charge volumes and pipeline no notice service at the prevailing rates for such services.
Q. How did Peoples estimate the amount of gas to be purchased from various sources during the projected period of January 1999 through December 1999?
A. People's projected amount of gas to be purchased is based upon the total actual throughput of therms delivered to customers during a "base period", including both sales of Peoples' system supply and transportation deliveries of third party gas purchased by end-users of Peoples. Total throughput was then reduced by all volumes purchased or transported for major electric power generation, since such usage is expected to be delivered entirely as transportation volumes during the projection period. Then, the throughput was adjusted for anticipated customer growth and normal weather.
Q. What adjustments were made to the remaining actual system throughput volumes?
A. Peoples anticipates additional end-users will be converted from sales to transportation service during the projection
period. The total remaining actual system throughput was decreased to allow for such conversions to transportation. The resulting remaining amount, therefore, is the adjusted projected period throughput.
Q. What other adjustments were made?
A. Based on the amount of firm transportation capacity expected to be used by end-users, total estimated end-user transportation volumes (other than for major electric generation) for the projection period were deducted from the adjusted projected throughput. The remaining amount represents the total estimated amount of system supply volumes to be purchased by Peoples from third party sources for transportation through FGT and SGNG. Separate estimates, based on available transportation capacity, were made for the following categories of purchases by Peoples:
6. Third party transportation volumes purchased for direct delivery at the South Georgia gate station near Jacksonville
7. Third party transportation volumes purchased at various FGT receipt points and transported to Peoples' gate stations via firm FTS-1 and FTS-2 transportation service
8. No Notice Transportation Service (NNTS), FGT Balancing

Charge volumes and FGT Operational Flow Order Penalty Charge Volumes will be utilized on FGT Alert Days and Operational Flow Order Days, if necessary, when Peoples is required by FGT to keep actual deliveries within scheduled deliveries (within tariff tolerance levels)
Q. How were the No Notice Transportation Service (NNTS), FGT Balancing Charge volumes and FGT Penalty Charge volumes .. item 5 above .. determined?
A. Peoples must purchase its allocated quantity of NNTS whether or not the service is actually used. FGT Balancing Charge volumes may be purchased on as many as 10 days per month during the projected period.
Q. Does Peoples expect to utilize all of its available firm transportation capacity during the projection period?
A. That depends on the amount of gas purchased or transported for electric power generation and the level of market demand for firm transportation capacity in the pipeline capacity release market.
Q. How did you estimate the purchase price to be paid by

Peoples for each of its available sources of supply?
A. The estimating procedures used for each category of purchases by Peoples are as follows:

1. Third party direct transportation volumes were estimated based on an evaluation of published prices for the last several years for spot gas delivered to the FGT and Southern Natural Gas Company ("SONAT") systems and futures market prices for the projection period of January 1999 through Decemier 1999. These prices were then adjusted to reflect the potential for unexpected increases in natural gas prices in the projection period.
2. NNTS, FGT Balancing Charge and FGT Penalty Charge volumes purchased from FGT were estimated based on FGT's most current rates on file with the FERC and reasonable expectations for the possible cost of gas utilized by FGT as provided for in the recently effective Balancing Tools Settlement.
Q. Referring $t \supset$ Schedules E-3 (A) through (G) of Composite Exhibit EB-2, please explain the components of these schedules and the assumptions which were made in developing the Company's projections.
A. Schedule E-3 (G) is a compilation of the monthly data which appear on Schedules E-3 (A) through (F) for the corresponding months of January 1999 through December 1999.

In Schedules E-3 (A) through (F), Column (A) Indicates the applicable month for all data on the page.

In Column (B), "FGT" indicates that the volumes are to be purchased from third party suppliers for delivery via FGT transportation. "MARKETER" indicates that the volumes are to be purchased from a third party supplier for delivery via SONAT and South Georgia Natural jas ("South Georgia"). "THIRD PARTY" indicates that the volumes are to be purchased directly from various third party suppliers for delivery into FGT or SONAT.

In Column (C), "RGS" means the purchase will be for Peoples' system supply and will become part of Peoples' total WACOG. None of the costs of gas or transportation for end-use purchases by end-use customers of Peoples are included in Peoples' WACOG.

In Column (D), purchases of pipeline transportation services from FGT under Rate Schedule FTS-1 and FTS-2 are split into two components, commodity (or usage") and
demand (or"reservation"). Both Peoples and end-users pay the usage charge based on the actual amount of gas transported. The FTS-1 and FTS-2 commodity costs shown include all related transportation charges including usage, fuel, ACA and Gas Research Institute ("GRI") charges. The FTS-1 and FTS-2 demand component is a fixed charge based on the maximum daily quantity of FTS-1 and FTS-2 firm transportation capacity reserved. End-users reimburse Peoples or directly pay FGT for all FTS-1 reservation charges associated with the transportation capacity which Peoples reserves and uses on their behalf. Similarly, the transportation rates of SONAT and South Georgia also consist of two components, a usage charge and a reservation charge.

Also in Column (D), "NO NOTICE TRANSPORTATION SERVICE" or "NNTS") means FGT's no notice service provided to Peoples on a fixed charge basis for use when People:' actual use exceeds scheduled quantities. "SWING SERVICE" means the demand and commodity component of the cost of third party supplies purchased to meet Peoples "swing" requirements for supply which fluctuate on a day-to-day basis. "COMMODITY" means third party purchases of gas transported on FGT, SONAT or South Georgia, and does not include any purchases of sales volumes from FGT.

Column (B) shows the monthly quantity in therms of gas purchased by Peoples for each category of system supply.

Column ( $F$ ) shows the gas purchased by end-users for transportation.

Column (G) is the total of Columns (E) and (F) in each row.

Columns (H), (I), (J) and (K) show the corresponding third party supplier commodity costs, pipeline transportation commodity costs, pipeline transportation reservation costs, and other charges (e.g., balancing charges), respectively. These costs are determined using the actual amounts paid by Peoples. In the case of end-user transportation, these costs are reimbursed to Eeoples or paid directly to FGT. All ACA, GRI and fuel charges are included in the cormodity costs in Colurn (I) and, therefore, are not shown in Column (K).

Column (L) in each row is the sum of Columns (H), (I), and ( $K$ ) divided by Column (G).
Q. Referring to Schedule $\mathrm{E}-1$ of Composite Exhibit EB-2, please explain the components of these schedules and the
assumptions which were made in developing the Company's projections.
A. Schedule E-1 consists of three pages. Page 1 relates to Cost of Gas Purchased, Page 2 relates to Therms Purchased, and Page 3 relates to Cents per Therm, or Cost of Gas Purchased divided by Therms Purchased.

The categories or items on lines 1 through 14 on Page 1 correspond to the similar categories or items on lines 15 through 27 on Page 2, and to the similar categories or items on lines 28 through 45 on page 3 .

The data shown on Page 1 through Page 3 of Schedule E-1 are taken directly from Schedules E-3 (A) through (F) for the months of January 1999 through Docember 1999. The average cost per therm for the total projected period for each item is listed in lines 28 through 37 on Page 3 of Schedule E-1.
Q. What information is presented on Schedule $E-1 / R$ of Composite Exhibit EE-2?
A. Schedule $\mathrm{B}-1 / \mathrm{R}$ of Composite Exhibit EE-2 shows five months actual and four months estimated data for the current period from April 1998 through December 1998.
Q. What information is presented on Schedule E-2 of Composite Exhibit EE-2?
A. Schedule E-2 of Composite Exhibit EE-2 shows the amount of the prior period over/underrecoveries of gas costs which are included in the current PGA calculation.
Q. What is the purpose of Schedule E-4 of Composite Exhibit EE-2?
A. Schedule E-4 of Composite Exhibit $3 \mathrm{~B}-2$ simply shows the calculation of the estimated true-up amount for the April 1998 through December 1998 period. It is based on actual data for five months and four months of projected data.
Q. What information is contained on Schedule E-5 of Composice Bxhibit EE-2?
A. Schedule E-5 of Composite Exhibit EE-2 is statistical data which includes the projected therm sales and numbers of customers by customer class for the period from January 1999 through December 1999.
Q. How has the merger of Peoples Gas System and West Florida Natural Gas Company on June 30,1997 been accounted for in
the projected WACOG?
A. Beginning in April 1998, the gas supply and pipeline capacity for the previously separate companies were integrated under a single operating system. The estimate costs and projected therms used in exhibit EE- 2 reflect the combined gas supply, pipeline transportation, and customer usage for the two merged natural gas utilities. The resulting WACOG is a single value applicable to all of Peoples Gas System, including customers formerly in the West florida region. Similarly, beginning witn the April 1998 monthly actual gas cost filing, all Purchased Gas Adjustment filings were for the integrated, single operating system.
Q. Does this conclude your testimony?
A. Yes, it does.

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|  |  |  | COMPANY: PEOPLES QAS SYSTEM |  | TRANSPORTATION PURCMASES <br> SYSTEM SUPMY AND END USE <br> schedule e. 3 |  |  |  |  |  |  |
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| 1 FES 1993 | FGT | PGS | FTS-1 COMM | 21,638.454 |  | 21,638,454 |  | 365,781 |  |  | 10.304 |
| 18 | FGT | pos | FTS-2 COMM | 6,552,000 |  | 6.552.000 |  | 48.911 |  |  | 40.136 |
| 2 | Fat | pas | FTS-1 devand | 55,563,200 |  | 55.563,200 |  |  | 92.095.844 |  | 13.772 |
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| 4 | TMIRD PARTY | pos | SWWag service | 6,445.529 |  | 6,445.529 | 32,452.575 |  | 259.657 |  | 238.976 |
| 5 | manaxter | pas | SONAT TRANS COMm | 6,083,726 |  | 8,063.726 |  | 121,829 |  |  | 50.360 |
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| 9 | TMIRD PARTY | pas | commodrty | 27.669.185 |  | 27.669.185 | 510,523,346 |  |  |  | 838.051 |
| 10 | FGT | pas | BAL CHOSJOTHER | 0 |  | 0 |  |  |  | \$100.000 | 40.000 |
| 11 FERUAAYY TOTAL |  |  |  | 161,119,282 |  | 161,119,282 | 112,980,922 | 8109,140 | 43,094,845 | \$100,000 | 110.101 |

Composite Exhibit Na.
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| COMPANY: Peores ans system |  |  |  |  | system supar and end ust |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |  |  |  |
| ESTMMATED FOA TAE PROIECTEO PEAIOO OF: |  |  |  |  |  | januagr 93 Thengh DCCEMBER 99 |  |  |  | (K) OTMER CHARCES ACAMRYPust | a) <br> тоти Cents pen твеа |
| (4) | (8) | (C) | (0) | (E) | (4) | $\begin{gathered} \text { TOTAL } \\ \text { PUACHASEP } \\ \hline \end{gathered}$ | comuontry cost |  | demano <br> cosit |  |  |
| MOMTM | punctased <br> prom | PURCHASED For | SCH | system <br> supar | eno <br> use |  | $\begin{aligned} & \text { thand } \\ & \text { pantr } \end{aligned}$ | preure |  |  |  |
| 1 mar 1939 | , | pas | FTS. 1 comm | 6.590.507 |  | 6.590.507 |  | 120.335 |  |  | 50.304 |
| ${ }^{10}$ | fat | pos | fTS- 2 Comm | 8.695,500 |  | 8.695.500 |  | \$17.8.8 |  |  | 40.136 |
| 2 | яgt | as | FTS. 1 demano | 29,890,400 |  | 29,896.400 |  |  | 41,127.692 |  | 13.772 |
| 2. | fat | pas | frs 2 demano | 8.696.500 |  | 8.695,500 |  |  | 1678.697 |  | 87.804 |
| 3 | fat | pas | no notice | 6.665.000 |  | 6.665.000 |  |  | 439.324 |  | 40.590 |
| 4 | theno party | pos | swina senvice | 3.239.500 |  | 3.239.580 | 11,232,866 |  | 129,9\%4 |  | 438.376 |
| $s$ | maxeter | pas | somat trans comm | 8.234.872 |  | 8.234.872 |  | 129,046 |  |  | 40.300 |
|  | manceter | pas | so an trans comm | 8.045,470 |  | 8,045,470 |  | -17,137 |  |  | 10.212 |
| 7 | малакет | pas | somat demano | 9.998.424 |  | 9.998.424 |  |  | *286,405 |  | *2.806 |
| ${ }^{3}$ | manceter | pas | so ca demand | 9.788.460 |  | 9,768.480 |  |  | 8183.678 |  | 11.880 |
| , | thane party | pos | сомmodrty | 20,091.837 |  | 20.091.897 | 07.645.128 |  |  |  | 438.05 |
| 10 | FGT | pas | EAL. CHOS.OTMER | c |  |  |  |  |  | \$100.000 | 10.000 |
| If mar tota |  |  |  | 119,921,610 |  | 119,921,610 | 88,877,814 | 978,643 | 12,345,680 | \$100,000 | 19.508 |

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COMPANY: PEOPLES QAS SYSTEM
TRANSPORTATION PURCHASES
3sn ONG ONV Alddns waISAS

| ESTMATEP FOR THE PROHCTED PERUOD OF: |  |  |  | January 99 Through pecemegig |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (A) | (8) | (C) | (D) | (E) | (F) | (a) | (04) | 的 | (1) | (K) OTMER | (4) TOTAL |
|  | PUACHASED FROM | PURCHASED FOR | SCH | SYSTEM SYPPMY | END <br> USE | TOTAL | Thing <br> PARTY | PYPLunt | DEMAND | Cramges <br> ACAGRIFUS. | cents ma THERM |
| 1 JUN 1929 | FGT | pas | FTS. 1 COMM | 5.181,512 |  | 5,181,512 |  | \$15.752 |  |  | 50.304 |
|  | FGT | pos | FTS. 2 COMM | 8,415.000 |  | 8,415.000 |  | \$11.444 |  |  | 50.134 |
| 2 | Fat | PGS | FTS-1 DEMAND | 20,932.000 |  | 28,932,000 |  |  | 41.091.315 |  | 43.772 |
| 2 a | FCT | pas | FTS-2 DEMAND | 8,415.000 |  | 8.415,000 |  |  | 1856.707 |  | 57.804 |
| 3 | FGT | pas | NO NOTICE | 6,450,000 |  | 6,450,000 |  |  | 438.055 |  | \$0.590 |
|  | THEDD PARTY | pas | SWWa Senvice | 3.145.200 |  | 3,145.200 | 81,196.774 |  | 829,111 |  | 138.978 |
| 5 | MARICETER | pas | SONAT TRANS COMM | 8,513.869 |  | 8,513.869 |  | 130.650 |  |  | 40.360 |
| 0 | Manceten | pas | SO QA TRANS COMM | 8,318,050 |  | e.318,050 |  | 117.717 |  |  | 40.213 |
| 7 | Manketen | pos | SONAT DEMAND | 10.254 .555 |  | $10.254,555$ |  |  | \$234,256 |  | 42.772 |
| 8 | Marketen | Pas | SO GA DEMAND | 10.618,700 |  | 10.018,700 |  |  | 1182.307 |  | 81.820 |
| 9 | THIRD PARTY FGT | pas | COMMODITY | 18,769,362 |  | 18,769.362 | 87.141.892 |  |  |  | 138.051 |
| 10 |  | PGS | BAL. CHOS.OTHER | 0 |  | 0 |  |  |  | \$100,000 | 10.000 |
|  |  |  |  | 116,413,248 |  | 118,413,248 | [ $88,338,668$ | 475,564 | 42,281,761 | 1 1100,000 | 19.274 |

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COMPANY: PLOPLES QAS
system sumet ano eno use


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(EE-2)
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W3LSAS SVD STMOMA 'UNVAWOD
system supply and end use

| ESTMEATEO FOR TME PROJECTED PENOD OF: |  |  |  |  |  | JAMUARY99 TMREuS DECEMBER 99 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (4) | ( ${ }^{(1)}$ <br> PURCHASED <br> FROM | (C) <br> PUACMASED FQA | (D) <br> SCH <br> TYPE | (E) <br> SYSTEM <br> suppry | (F) <br> eno <br> use | (G) <br> TOTAL <br> PURCHASED | (ancommoorty cost |  | 11 <br> demand <br> $\cos 5$ | (K) <br> OTMER <br> CHARCES <br> ACAGRIFUEL | (a) <br> TOTAL cents ma <br> TRERA |
|  |  |  |  |  |  |  | tmind <br> PARTY | Prpune |  |  |  |
| 1 AUC 1993 | FGT | pos | FTS-1 COMM | 2.644.877 |  | 2.644.877 |  | 88.040 |  |  | 10.304 |
| 18 | FGT | pas | FTS. 2 COMM | 8,695,500 |  | 3,695.500 |  | 511,826 |  |  | 10.136 |
| 2 | FGT | pos | FTS-1 demano | 29.a96,400 |  | 29.896.400 |  |  | 51,127,692 |  | 81.772 |
| 20 | Fot | pas | FTS-2 DEMAND | 3,695.500 |  | 8.695.500 |  |  | 1678.597 |  | 87.804 |
| 3 | Fat | pas | NO NOTICE | 6.665,000 |  | 6,865,000 |  |  | 439.324 |  | 10.500 |
| 4 | TEMDD PARTY | pas | SWNa SERVICE | 3.275 .900 |  | 3.275,900 | 81.246.506 |  | \$30.320 |  | 838.976 |
| 5 | manketer | pes | SOMAT TRANS COMM | 9.872.047 |  | 9,872,047 |  | 835.539 |  |  | 40.360 |
| 6 | MARKETER | pas | So ca trans comm | 9,644.930 |  | 9,644,990 |  | \$20.544 |  |  | 40.213 |
| 7 | MNAKETER | pas | sonat demano | 10.540,317 |  | 10,540,317 |  |  | 1301,928 |  | \$2.865 |
| 3 | marketer | PGS | so ga demand | 10.297.890 |  | 10.297,890 |  |  | \$193.633 |  | 11.880 |
| 9 | THIRD PARTY | pas | commodry | 17,709,467 |  | 17,709,467 | 36.230.594 |  |  |  | 838.051 |
| 10 | FGT | pas | BAL CHOSJOTMER | 0 |  | 0 |  |  |  | \$100.000 | 40.000 |
| 11 August total |  |  |  | 117,937,888 |  | 117,937,888 | 87,985,100 | 175,950 | 12,371,494 | 1100,000 | 48.931 |

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（EE－2）
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1.040 .751

| $2.546,747$ | 2.454 .397 | 2.389 .903 | 2.136 .626 | 2.302 .073 |
| :--- | ---: | ---: | ---: | ---: |
| 1.531 .789 | 1.524 .736 | $1.339,343$ | $1,232.941$ | 1.213 .031 | ำ

2.454 .397

| 695.112 |
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| 592.918 |
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