BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery)	DOCKET NO. 050004-GU
Clause)	Filed: May 2, 2005
)	

PETITION OF FLORIDA CITY GAS FOR APPROVAL OF TRUE-UP

Florida City Gas hereby petitions the Commission for Approval of the Company's conservation cost recovery true-up for the months January 2004 through December 2004. In support thereof, the Company says:

- 1. The final true-up amount (Adjusted Net True-Up) for the months January 2004 through December 2004, is an over-recovery of \$76,175, including interest.
- The Company's calculation of the true-up amount is consistent with the Commission's methodology, and supported by the Direct Testimony of Rosie Abreu and Schedules CT-1, CT-2 and CT-3.

WHEREFORE, Florida City Gas requests that its true-up for the months January 2004 through December 2004, be approved.

RESPECTFULLY SUBMITTED this 2nd day of May 2005.

AKERMAN SENTERFITT

106 East College Avenue, Suite 1200 P. O. Box 1877

Tallahassee, FL 32302-1877

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Bill L. Bryant Jr., Esq.

Florida Bar Number: 179270 Attorney for Florida City Gas

DOCUMENT NUMBER-DATE

04269 MAY-28

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Petition of Florida City Gas for Approval of True-Up and supported by the Direct Testimony and Exhibits of Rosie Abreu, has been furnished by regular U.S. Mail to the following the 2nd day of May 2005.

Elizabeth Wade AGL Resources Inc. Ten Peachtree Place Location 1470 Atlanta, GA 30309

Florida Public Utilities Company Mr. Geoff Hartman Post Office Box 3395 West Palm Beach, FL 33402-3395

MacFarlane Ferguson Law Firm Ansley Watson, Jr. Post Office Box 1531 Tampa, FL 33601-1531

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Florida City Gas Charles A. Rawson, III 955 East 25th Street Hialeah. FL 33013-3498 Florida Division of Chesapeake Utilities Corp. Mr. Thomas A. Geoffroy Post Office Box 960 Winterhaven, FL 33882-0960

People Gas System
Ms. Angela L. Llewellyn
Regulatory Affairs
Post Office Box 111
Tampa, FL 33601-0111

St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf Post Office Box 549 Port St. Joe, FL 32457-0549

TECO Energy, Inc. Matthew Costa Post Office Box 111 Tampa, FL 33601-0111

Martha Brown Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Bill L. Bryant, Jr.

1		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2		DIRECT TESTIMONY OF
3		ROSIE ABREU
4		ON BEHALF OF FLORIDA CITY GAS
5		DOCKET NO. 050004-GU
6		
7		
8		
9	Q.	Please state your name, business address, by whom you are
10		employed, and in what capacity.
11	A.	My name is Rosie Abreu and my business address is 955 East 25 Street,
12		Hialeah, FL 33013. I am employed by Florida City Gas as a Regulatory
13		and Business Analyst.
14		
15	Q.	Please describe your educational and employment background.
16	A.	I have a Bachelor of Science Degree in Computer Science from Florida
17		International University and an Associates in Arts Degree in Business
18		Data Processing from Miami-Dade Community College. In 2001, I joined
19		Florida City Gas as a Regulatory and Business Analyst in the Regulatory
20		Affairs Department. I have been employed in the gas utility industry in
21		Florida for over ten years.
22		
23	Q.	Are you familiar with the energy conservation programs of Florida
24		City Gas?
25	Δ	Yes Lam

1		
2	Q.	Are you familiar with the costs that have been incurred and that are
3		projected to be incurred by Florida City Gas in implementing its
4		energy conservation programs?
5	A.	Yes, I am.
6		
7	Q.	What is the purpose of your testimony in this docket?
8	A.	To submit the recoverable costs incurred during the period ending
9		December 31, 2004, and to identify the final true-up amount related to that
10		period.
11		
12	Q.	Has Florida City Gas prepared schedules which show the
13		expenditures associated with its energy conservation programs for
14		the period you have mentioned?
15	A.	Yes. I have prepared and filed together with this testimony Exhibit RA-1
16		consisting of Schedules CT-1, CT-2 and CT-3.
17		
18	Q.	What amount did Florida City Gas spend on conservation programs
19		during this period?
20	A.	\$3,237,142.
21		
22	Q.	What is the final true-up amount associated with the period
23		ending December 31, 2004?
24	A.	An over-recovery of \$76,175.

- 1 Q. Does this conclude your testimony?
- 2 A. Yes, it does.

Florida City Gas DOCKET NO. 050004-GU Exhibit ___ (RA-1) Page 1 of 10

ADJUSTED NET TRUE UP JANUARY 2004 THROUGH DECEMBER 2004

END OF PERIOD NET TRUE-UP

LESS PROJECTED TRUE-UP	PRINCIPLE	(34,669) (4,212)	(38,881)
LEGG I NOTE OF			
	PRINCIPLE	41,218	
	INTEREST	(3,924)	37,294
ADJUSTED NET TRUE-UP			(76,175)

() REFLECTS OVER-RECOVERY

Florida City Gas DOCKET NO. 050004-GU Exhibit ___ (RA-1) Page 2 of 10

ANALYSIS OF ENERGY CONSERVATION PROGRAM COSTS ACTUAL VERSUS ESTIMATED JANUARY 2004 THROUGH DECEMBER 2004

	ACTUAL	PROJECTED **	* <u>DIFFERENC</u> E
CAPITAL INVESTMENT			-
PAYROLL & BENEFITS	689,636	696,691	(7,055)
MATERIALS & SUPPLIES			
ADVERTISING	353,814	296,052	57,762
INCENTIVES	2,131,779	2,390,729	(258,950)
OUTSIDE SERVICES	34,987	35,478	(491)
VEHICLES	26.925	26,385	540
OTHER	•		
SUB-TOTAL	3,237,142	3,445,335	(208,193)
PROGRAM REVENUES			
TOTAL PROGRAM COSTS	3,237,142	3,445,335	(208,193)
LESS:	0,201,111	2, ,	,
PAYROLL ADJUSTMENTS		-	-
AMOUNTS INCLUDED IN RATE BASE		=	-
CONSERVATION ADJUSTMENT			
REVENUES	(3,271,811)	(3,404,117)	132,306
ROUNDING ADJUSTMENT		<u></u>	
TRUE-UP BEFORE INTEREST	(34,669)	41,218	(75,887)
INTEREST PROVISION	(4,212)	(3,924)	(288)
END OF PERIOD TRUE-UP	(38,881)	37,294	(76,175)

⁽⁾ REFLECTS OVER-RECOVERY

^{***} Eight months actual and four months projected (Jan-Dec'2004) Page 1 of 1

Florida City Gas
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Exhibit ___ (RA-1)
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ACTUAL CONSERVATION PROGRAM COSTS PER PROGRAM JANUARY 2004 THROUGH DECEMBER 2004

PROGRAM NAME		CAPITAL INVESTMENT	• • • • • • • • • • • • • • • • • • • •	MATERIALS & SUPPLIES	ADVERTISING	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
PROGRAM 1:	SINGLE FAMILY HOME BUILDER	-	229,131		45,116	1,865,416	-	8,075	-	2,147,739
PROGRAM 2:	MULTI FAMILY HOME BUILDER		11,020			33,600	-	608	-	45,228
PROGRAM 3:	ELECTRIC REPLACEMENT		117,375		128,378	81,491	-	6,001	-	333,245
PROGRAM 4:	DEALER PROGRAM		-	-	-	-	-	-	-	-
PROGRAM 5:	SCHOOLS PROGRAM	-	-	-	-	-	-	-	-	-
PROGRAM 6:	PROPANE CONVERSION		-	-		550	-	8	-	558
PROGRAM 7:	WATER HEATER RETENTION		21,240			112,174	-	1,728	-	135,142
PROGRAM 8:	RESIDENTIAL CUT AND CAP		17,866			650	-	609	-	19,125
PROGRAM 9:	COMM/IND CONVERSION		254,291			37,898	-	9,448	-	301,636
PROGRAM 10:	ALTERNATIVE TECHNOLOGY		5,605		4,641	-	-	448	-	10,694
	COMMON COSTS		33,108		175,679		34,987			243,775
TOTAL	TOTAL OF ALL PROGRAMS	-	689,636		353,814	2,131,779	34,987	26,925		3,237,142

SCHEDULE CT-2 PAGE 3 OF 4

Florida City Gas DOCKET NO. 050004-GU Exhibit ___ (RA-1) Page 4 of 10

CITY GAS COMPANY OF FLORIDA PROJECTED CONSERVATION COSTS PER PROGRAM JANUARY 2004 THROUGH DECEMBER 2004 EIGHT MONTHS ACTUAL AND FOUR MONTHS ESTIMATED

	CAPITAL	PAYROLL &	MATERIALS			OUTSIDE	VELUOI E	OTUED	TOTAL
PROGRAM NAME	INVESTMENT	BENEFITS	& SUPPLIES	ADVERTISING	INCENTIVES	SERVICES	VEHICLE	OTHER	TOTAL
PROGRAM 1: SINGLE FAMILY HOME BUILDER	-	214,246	-	32,607	2,085,766		7,917	-	2,340,536
PROGRAM 2: MULTI FAMILY HOME BUILDER	-	12,102	_		45,600	-	506	-	58,208
PROGRAM 3: ELECTRIC REPLACEMENT	-	136,584	-	87,591	93,384	-	6,113	-	323,672
PROGRAM 4: DEALER PROGRAM	-	-	-			-	-	-	
PROGRAM 5: SCHOOLS PROGRAM							-	-	
PROGRAM 6: PROPANE CONVERSION		1,378		-	450				1,828
PROGRAM 7: WATER HEATER RETENTION		34,608		-	106,386		1,737		142,731
PROGRAM 8: RESIDENTIAL CUT AND CAP		19,227		-	2,450		575		22,252
PROGRAM 9: COMM/IND CONVERSION		242,821		1,400	40,693		9,081		293,995
PROGRAM 10: ALTERNATIVE TECHNOLOGY		6,431		4,725	16,000		456		27,612
COMMON COSTS		29,294		169,729		35,478			234,501
TOTAL TOTAL OF ALL PROGRAMS		696,691		296,052	2,390,729	35,478	26,385		3,445,335

Page 1 of 1 CT-2 Projected

Florida City Gas
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Exhibit ___ (RA-1)
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CONSERVATION COSTS PER PROGRAM - VARIANCE ACTUAL VERSUS PROJECTED JANUARY 2004 THROUGH DECEMBER 2004

PROGRAM NAM	PROGRAM NAME			MATERIALS & SUPPLIES	ADVERTISING	INCENTIVES	OUTSIDE SERVICES	VEHICLE	OTHER	TOTAL
PROGRAM 1:	SINGLE FAMILY HOME BUILDER	-	14,885	-	12,509	(220,350)		158	-	(192,797)
PROGRAM 2:	MULTI FAMILY HOME BUILDER	-	(1,082)	-		(12,000)	-	102	-	(12,980)
PROGRAM 3:	ELECTRIC REPLACEMENT	-	(19,209)	-	40,787	(11,893)	-	(112)		9,573
PROGRAM 4:	DEALER PROGRAM	-		-	-	-	-		-	-
PROGRAM 5:	SCHOOLS PROGRAM			-	-		-			-
PROGRAM 6:	PROPANE CONVERSION	-	(1,378)	-	-	100	-	8	-	(1,270)
PROGRAM 7:	WATER HEATER RETENTION		(13,368)	-	-	5,788	-	(9)	-	(7,589)
PROGRAM 8:	RESIDENTIAL CUT AND CAP	-	(1,361)	-		(1,800)		34	-	(3,127)
PROGRAM 9:	COMM/IND CONVERSION		11,470	-	(1,400)	(2,795)		367	-	7,641
PROGRAM 10:	ALTERNATIVE TECHNOLOGY		(826)		(84)	(16,000)	-	(8)	-	(16,918)
	COMMON COSTS		3,814	*	5,950	-	(491)			9,274
TOTAL	TOTAL OF ALL PROGRAMS		(7,055)	-	57,762	(258,950)	(491)	540	<u>-</u>	(208,193)

Florida City Gas
DOCKET NO. 050004-GU
Exhibit ___ (RA-1)
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ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION SUMMARY OF EXPENSES BY MONTH JANUARY 2004 THROUGH DECEMBER 2004

EXPENSES:	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Total
PROGRAM 1:	134,127	182,380	273,123	155,547	148,828	223,716	153,010	319,753	136,137	128,598	147,764	144,756	2,147,739
PROGRAM 2:	22,003	12,637	969	1,037	1,032	975	1,818	487	1,461	572	1,146	1,094	45,228
PROGRAM 3:	41,000	20,167	23,512	19,580	22,402	16,251	23,319	24,136	43,421	12,667	21,211	65,581	333,245
PROGRAM 4: PROGRAM 5:	-	-	•	-· -		-		- -	-	- -	<u>-</u>	-	-
PROGRAM 6:	225	925		14,500	4,150	-		(18,450)	(900)	2	1	106	558
PROGRAM 7:	14,485	10,782	11,248	12,293	8,758	10,809	9,930	13,438	11,091	9,914	11,355	11,038	135,142
PROGRAM 8:	1,171	1,111	1,536	1,492	1,830	1,847	1,828	1,728	2,165	1,488	1,568	1,360	19,125
PROGRAM 9:	18,152	28,597	16,660	24,579	24,803	25,147	24,134	21,495	45,492	22,056	25,758	24,762	301,636
PROGRAM 10: COMMON COSTS TOTAL	204 4,962 236,330	2,486 10,687 269,773	(49) 43,643 370,642	640 26,013 255,681	552 18,749 231,103	444 22,058 301,247	672 3,600 218,311	225 24,872 387,682	1,386 39,503 279,756	2,971 8,156 186,424	577 5,553 214,932	586 35,979 285,261	10,694 243,775 3,237,142
LESS AMOUNT INCLUDED IN RATE BASE													
RECOVERABLE CONSERVATION EXPENSES	236,330	269,773	370,642	255,681	231,103	301,247	218,311	387,682	279,756	186,424	214,932	285,261	3,237,142

Florida City Gas
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Exhibit ___ (RA-1)
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SCHEDULE CT-2 PROJECTED CONSERVATION COSTS PER MONTH JANUARY 2004 THROUGH DECEMBER 2004 EIGHT MONTHS ACTUAL AND FOUR MONTHS ESTIMATED

EXPENSES:													
	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Total
PROGRAM 1:	134,127	182,381	273,123	155,546	148,827	223,716	153,010	319,753	187,729	187,914	185,596	187,914	2,339,636
PROGRAM 2:	22,004	12,637	969	1,037	1,032	975	1,817	486	4,350	4,358	4,185	4,358	58,208
PROGRAM 3:	41,000	20,168	23,511	19,580	22,402	16,251	23,319	24,137	33,671	33,971	31,691	33,971	323,672
PROGRAM 4:				-	-	-	-	-	-	-	-	•	-
PROGRAM 5:						-	-						
PROGRAM 6:	225	925	-	14,500	4,150	-	•	(18,450)	354	357	310	357	2,728
PROGRAM 7:	14,485	10,782	11,249	12,293	8,758	10,809	9,929	13,439	12,859	12,944	12,240	12,944	142,731
PROGRAM 8:	1,170	1,111	1,536	1,493	1,831	1,847	1,828	1,728	2,483	2,493	2,239	2,493	22,252
PROGRAM 9:	18,152	28,598	16,660	24,579	24,803	25,148	24,135	21,495	28,587	28,150	24,838	28,850	293,995
PROGRAM 10:	204	2,486	(49)	640	553	444	672	225	6,230	5,046	4,915	6,246	27,612
COMMON COSTS	4,962	10,688	43,642	26,013	18,748	22,059	3,600	24,871	20,045	20,056	19,761	20,056	234,501
TOTAL	236,329	269,776	370,641	255,681	231,104	301,249	218,310	387,684	296,308	295,289	285,775	297,189	3,445,335
LESS AMOUNT													
INCLUDED IN													
RATE BASE													
RECOVERABLE													
CONSERVATION													
EXPENSES	236,329	269,776	370,641	255,681	231,104	301,249	218,310	387,684	296,308	295,289	285,775	297,189	3,445,335

Florida City Gas
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Exhibit ___ (RA-1)
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SCHEDULE CT-2 SUMMARY OF EXPENSES BY PROGRAM VARIANCE ACTUAL VERSUS PROJECTED JANUARY 2004 THROUGH DECEMBER 2004

EXPENSES:	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Total
							(0)	(0)	(E1 E02)	(59,316)	(37,832)	(43,158)	(191,897)
PROGRAM 1:	0	(1)	0	1	1	0	(0)	(0)	(51,592)				
PROGRAM 2:	(1)	(0)	(0)	(0)	(0)	0	1	1	(2,889)	(3,786)	(3,039)	(3,264)	(12,980)
PROGRAM 3:	0	(1)	1	(0)	(0)	(0)	0	(1)	9,750	(21,304)	(10,480)	31,610	9,573
PROGRAM 4:	-	-	-	-	-	-	-	-		-	-	-	•
PROGRAM 5:	-	-	-	-	-	-	•	-	-	-	-	-	-
PROGRAM 6:	-	-	-	-	-	-	-	-	(1,254)	(355)	(309)	(251)	(2,170)
PROGRAM 7:	0	(0)	(1)	(0)	0	(0)	1	(1)	(1,768)	(3,030)	(885)	(1,906)	(7,589)
PROGRAM 8:	1	(0)	0	(1)	(1)	0	0	(0)	(318)	(1,005)	(671)	(1,133)	(3,127)
PROGRAM 9:	(0)	(1)	(0)	0	(0)	(1)	(1)	0	16,905	(6,094)	920	(4,088)	7,641
PROGRAM 10:	0	0	0	0	(1)	(0)	0	(0)	(4,844)	(2,075)	(4,338)	(5,660)	(16,918)
COMMON COSTS	0	(1)	1	0	1	(1)	0	1	19,458	(11,900)	(14,208)	15,923	9,274
TOTAL	1	(3)	1	(0)	(1)	(2)	1	(2)	(16,552)	(108,865)	(70,843)	(11,928)	(208,193)
LESS AMOUNT													
INCLUDED IN													
RATE BASE													
RECOVERABLE													
CONSERVATION EXPENSES	1	(3)	1	(0)	(1)	(2)	1	(2)	(16,552)	(108,865)	(70,843)	(11,928)	(208,1 93)

Florida City Gas

DOCKET NO. 050004-GU

Exhibit ___ (RA-1)

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ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION JANUARY 2004 THROUGH DECEMBER 2004

	Jan-04	Feb-04	Mar-04	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Total
1 RCS AUDIT FEES													
2 OTHER PROGRAM REVS 3 CONSERV. ADJ REVS	(297,283)	(280,887)	(281,232)	(245,384)	(210,948)	(194,121)	(192,763)	(185,214)	(188,212)	(189,404)	(210,639)	(242,898)	(2,718,985)
4 TOTAL REVENUES 5 PRIOR PERIOD TRUE UP NOT	(297,283)	(280,887)	(281,232)	(245,384)	(210,948)	(194,121)	(192,763)	(185,214)	(188,212)	(189,404)	(210,639)	(242,898)	(2,718,985)
APPLICABLE TO THIS PERIOD CONSERVATION REVENUES	(46,069)	(46,069)	(46,069)	(46,069)	(46,069)	(46,069)	(46,069)	(46,069)	(46,069)	(46,069)	(46,069)	(46,067)	(552,826)
6 APPLICABLE TO THE PERIOD	(343,352)	(326,956)	(327,301)	(291,453)	(257,017)	(240,190)	(238,832)	(231,283)	(234,281)	(235,473)	(256,708)	(288,965)	(3,271,811)
CONSERVATION EXPENSES 7 (FROM CT-3, PAGE 1)	236,330	269,773	370,642	255,681	231,103	301,247	218,311	387,682	279,756	186,424	214,932	285,261	3,237,142
8 TRUE-UP THIS PERIOD 9 INTEREST PROVISION	(107,022)	(57,183)	43,341	(35,772)	(25,914)	61,057	(20,521)	156,399	45,475	(49,049)	(41,776)	(3,704)	(34,669)
THIS PERIOD (FROM CT-3 PAGE 3)	(508)	(519)	(475)	(445)	(446)	(448)	(453)	(351)	(179)	(129)	(144)	(114)	(4,212)
10 TRUE-UP & INTER. PROV. BEGINNING OF MONTH	(552,826)	(614,287)	(625.920)	(536.985)	(527,134)	(507,425)	(400,747)	(375,651)	(173.534)	(82,169)	(85,279)	(81,130)	
11 PRIOR PERIOD TRUE UP					, ,		, ,	((,	(-2,,,,,	(33,273)	(01,100)	
COLLECTED/(REFUNDED)	46,069	46,069	46,069	46,069	46,069	46,069	46,069	46,069	46,069	46,069	46,069	46,067	
12 TOTAL NET TRUE UP (SUM LINES 8+9+10+11)	(614,287)	(625,920)	(536,985)	(527,134)	(507,425)	(400,747)	(375,651)	(173,534)	(82,169)	(85,279)	(81,130)	(38,881)	(38,881)

Florida City Gas

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Exhibit ___ (RA-1)
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CALCULATION OF TRUE-UP AND INTEREST PROVISION JANUARY 2004 THROUGH DECEMBER 2004

	INTEREST PROVISION	Jan-04	Feb-04	Mar-04	Арг-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Total
1.	BEGINNING TRUE-UP	(552,826)	(614,287)	(625,920)	(536,985)	(527,134)	(507,425)	(400,747)	(375,651)	(173,534)	(82,169)	(85,279)	(81,130)	
2.	ENDING TRUE-UP BEFORE INTEREST	(613,779)	(625,401)	(536,511)	(526,688)	(506,979)	(400,299)	(375,198)	(173,183)	(81,990)	(85,149)	(80,986)	(38,767)	
3.	TOTAL BEGINNING & ENDING TRUE-UP	(1,166,605)	(1,239,688)	(1,162,431)	(1,063,674)	(1,034,113)	(907,723)	(775,945)	(548,834)	(255,524)	(167,319)	(166,264)	(119,897)	
4.	AVERAGE TRUE-UP (LINE 3 TIMES 50%)	(583,303)	(619,844)	(581,215)	(531,837)	(517,056)	(453,862)	(387,973)	(274,417)	(127,762)	(83,659)	(83,132)	(59,948)	
5.	INTER. RATE - 1ST DAY OF REPORTING MONTH	1.060%	1.030%	0.980%	0.980%	1.030%	1.040%	1.330%	1.470%	1.600%	1.770%	1.940%	2.220%	
6.	INTER. RATE - 1ST DAY OF SUBSEQUENT MONTH	1.030%	0.980%	0.980%	1.030%	1.040%	1.330%	1.470%	1.600%	1.770%	1.940%	2.220%	2.340%	
7.	TOTAL (SUM LINES 5 & 6)	2.090%	2.010%	1.960%	2.010%	2.070%	2.370%	2.800%	3.070%	3.370%	3.710%	4.160%	4.560%	
8.	AVG INTEREST RATE (LINE 7 TIMES 50%)	1.045%	1.005%	0.980%	1.005%	1.035%	1.185%	1.400%	1.535%	1.685%	1.855%	2.080%	2.280%	
9.	MONTHLY AVG INTEREST RATE	0.087%	0.084%	0.082%	0.084%	0.086%	0.099%	0.117%	0.128%	0.140%	0.155%	0.173%	0.190%	
10. 10.	INTEREST PROVISION (LINE 4 TIMES LINE 9) a. INT. ADJ	(508)	(519)	(475)	(445)	(446)	(448)	(453)	(351)	(179)	(129)	(144)	(114)	(4,212)