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May 1, 2024

## VIA: ELECTRONIC FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Re: Docket No. 20240004-GU; Natural Gas Conservation Cost Recovery
Dear Mr. Teitzman:
Attached for filing in the above docket is Peoples Gas System, Inc.'s Petition for approval of the true-up amount for the period January 1, 2023 through December 31, 2023.

Thank you for your assistance in connection with this matter.


Virginia L. Ponder
VLP/ne
Attachment
cc: All Parties of Record (w/attachment)

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost )
$\qquad$ ) Docket No. 20240004-GU
) Submitted for Filing: May 1, 2024

## PETITION OF PEOPLES GAS SYSTEM, INC. <br> FOR APPROVAL OF TRUE-UP AMOUNT

Peoples Gas System, Inc. ("Peoples" or the "company"), through undersigned counsel and pursuant to Rule 25-17.015, Florida Administrative Code, petitions the Florida Public Service Commission ("Commission") for approval of its end-of-period final energy conservation cost recovery true-up amount for the period January 1 through December 31, 2023, and in support thereof says:

1. The name and address of the Petitioner are:

Peoples Gas System, Inc.
P. O. Box 2562

Tampa, Florida 33601-2562
2. The persons to whom notices, orders, pleadings and correspondence in this docket should be addressed are:
J. Jeffry Wahlen

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CTMorganII@tecoenergy.com
3. Peoples' calculation of the true-up amounts for which approval is hereby requested is consistent with the Commission's prescribed methodology. These calculations and the supporting documentation are contained in Exhibit CTM-1, consisting of the Energy Conservation Cost Recovery True-Up Reporting Forms, completed as directed by the Commission Staff. Exhibit CTM-1 is submitted for filing with this petition.
4. For the period January through December 2023, Peoples has calculated its end-ofperiod final true-up amount to be an under-recovery, including interest, of $\$ 11,590,787$.

WHEREFORE, Peoples Gas System, Inc. respectfully requests that the Commission grant this petition and approve the under-recovery of $\$ 11,590,787$ as the final true-up amount for the January through December 2023 period.

Respectfully submitted,

J. JEFFRY WAHLEN jwahlen@ausley.com MALCOLM N. MEANS mmeans@ausley.com VIRGINIA L. PONDER
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Attorneys for Peoples Gas System, Inc.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing petition, together with copies of the Direct Testimony of Charles T. Morgan II and Exhibit CTM-1, have been furnished by electronic mail this 1st day of May 2024, to the following:

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ATTORNEY

BEFORE THE<br>FLORIDA PUBLIC SERVICE COMMISSION DOCKET NO. 20240004-GU IN RE: NATURAI GAS CONSERVATION COST RECOVERY CLAUSE<br>TESTIMONY AND EXHIBIT OF<br>CHARIES T. MORGAN II

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION PREPARED DIRECT TESTIMONY <br> OF 

CHARLES T. MORGAN II
Q. Please state your name, business address, by whom you are employed, and in what capacity?
A. My name is Charles T. Morgan II. My business address is 702 North Franklin Street, Tampa, Florida 33602. I am employed by Peoples Gas System, Inc. ("Peoples" or the "company") as Supervisor of Conservation Programs, in the Regulatory Affairs Department.
Q. Please describe your educational and employment background.
A. I graduated from Florida State University in 2009 with a Bachelor of Science degree in Social Science. My work experience includes seven years of regulatory experience, including three years with the Florida Public Service Commission as a Public Utility Analyst and four years as a Regulatory Analyst with Peoples before beginning my current role in 2024. In my current position, I am responsible for Peoples' Natural Gas Conservation Cost Recovery ("NGCCR")

Clause and other Conservation and demand-side management ("DSM") activities.
Q. What is the purpose of your testimony in this docket?
A. The purpose of my testimony is to present and support for Commission review and approval the company's actual DSM program true-up costs incurred during the January through December 2024 period.
Q. Did you prepare any exhibits in support of your testimony?
A. Yes. Exhibit No. CTM-1, entitled "Peoples Gas System, Inc. Schedules Supporting Conservation Cost Recovery Factor, Actual, January 2023-December 2023" was prepared under my direction and supervision. This Exhibit includes Schedules CT-1 through CT-3, and CT-6 which support the company's actual and prudent DSM program-related true-up costs incurred during the January through December 2023 period.
Q. What were Peoples' actual January through December 2023 conservation costs?
A. For the period January through December 2023, Peoples Gas System incurred actual net conservation costs of
$\$ 30,425,021$.
Q. What is the final end of period net true-up for the conservation clause for January through December 2023?
A. The final conservation clause end of period net true-up for January through December 2023 is an under-recovery, including interest, of $\$ 11,590,787$. This calculation is detailed on Schedule CT-1, page 1 of 1.
Q. Please summarize how Peoples's actual program costs for January through December 2023 period compare to the actual/estimated costs presented in Docket No. 20230004GU?
A. Peoples' actual program costs for 2023 were lower than actual/estimated costs presented in Docket No. 20230004GU by $\$ 1,239,572$. The total program costs were projected to be $\$ 31,664,593$, compared to the actual costs of \$30,425, 021 .
Q. Please summarize the reasons for which actual expenses were less than projected expenses.
A. The variance was a result of lower expenses in all of

Peoples' conservation programs, apart from Commercial Retention. Higher expenses in Commercial Retention partially offset the lower expenses in the remaining programs. The actual versus projected variance for each program is detailed on Schedule CT-2, Page 3 of 3.
Q. Should Peoples' costs incurred during the January through December 2023 period for energy conservation be approved by the Commission?
A. Yes, the costs incurred were prudent and directly related to the Commission's approved DSM programs and should be approved.
Q. Does that conclude your testimony?
A. Yes, it does.

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## SCHEDULE CT-1

PEOPLES GAS SYSTEM
Energy Conservation
Adjusted Net True-up
For Months January 2023 through December 2023
End of Period Net True-up

Principle $\quad(11,347,130)$
Interest $(243,657)$
Total
$(11,590,787)$

Less Projected True-up

| Principle | $(12,193,389)$ |
| :--- | ---: |
| Interest | $(238,089)$ |

Total
$(12,431,477)$
Adjusted Net True-up
840,690
( ) Reflects Under-Recovery

## PEOPLES GAS SYSTEM

Analysis of Energy Conservation Program Costs Actual vs. Projected For Months January 2023 through December 2023

| Description | Actual | Projected | Difference |
| :--- | :---: | :---: | :---: |
| 1 Capital Investment | $\$ 0$ | $\$ 0$ | $\$ 0$ |
| 2 Payroll | $\$ 560,543$ | $\$ 567,347$ | $(\$ 6,804)$ |
| 3 Materials and Supplies | $\$ 0$ | $\$ 0$ | $\$ 0$ |
| 4 Advertising | $\$ 1,130,074$ | $\$ 1,171,426$ | $(\$ 41,352)$ |
| 5 Incentives | $\$ 28,438,513$ | $\$ 29,521,380$ | $(\$ 1,082,867)$ |
| 6 Outside Services | $\$ 216,738$ | $\$ 332,420$ | $(\$ 115,682)$ |
| 7 Vehicles | $\$ 1,369$ | $\$ 1,092$ | $\$ 277$ |
| 8 Other | $\$ 77,784$ | $\$ 70,928$ | $\$ 6,856$ |
| 9 Total Program Cost | $\$ 30,425,021$ | $\$ 31,664,593$ | $(\$ 1,239,572)$ |
| 10 Beginning of Period True-up | $(\$ 1,571,783)$ | $(\$ 1,571,783)$ | $\$ 0$ |
| 11 Amounts included in Base Rates | $\$ 0$ | $\$ 0$ | $\$ 0$ |
| 12 Conservation Adjustment Revenues | $(\$ 17,506,108)$ | $(\$ 17,899,419)$ | $\$ 393,310$ |
| 13 Regulatory Adjustments | $\$ 0$ | $\$ 0$ | $\$ 0$ |
| 14 True-up Before Interest | $(\$ 11,347,130)$ | $(\$ 12,193,389)$ | $\$ 846,259$ |
| 15 Interest Provision | $(\$ 243,657)$ | $(\$ 238,089)$ | $(\$ 5,568)$ |
| 16 End of Period True-up | $(\$ 11,590,787)$ | $(\$ 12,431,477)$ | $\$ 840,690$ |


TOTAL


$7 \times 10$

TOTAL


| January | February | March | April | May | June | July | August | September | October | November | December | Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| - | - | - | - | 125,000 | - | - | - | - | - | - | - | 125,000 |
| 885,600 | 1,398,950 | 962,300 | 1,789,600 | 1,048,900 | 2,681,700 | 1,179,600 | 1,011,925 | 1,028,600 | 1,088,125 | 1,248,350 | 933,900 | 15,257,550 |
| 57,600 | 52,675 | 50,800 | 29,650 | 49,400 | 34,700 | 16,150 | 29,075 | 18,150 | 18,000 | 23,250 | 20,600 | 400,050 |
| 524,400 | 328,500 | 335,745 | 263,993 | 328,850 | 276,600 | 177,550 | 245,500 | 285,528 | 183,850 | 317,800 | 285,450 | 3,553,766 |
| - | - | - | - | - | - | - | 834 | - | 7,507 | 834 | - | 9,175 |
| 135,532 | 130,698 | 314,020 | 146,469 | 183,726 | 252,746 | 119,118 | 189,816 | 275,401 | 127,597 | 208,692 | 103,302 | 2,187,117 |
| 70,205 | 128,001 | 107,912 | 112,554 | 76,500 | 84,783 | 45,485 | 75,994 | 54,517 | 39,322 | 65,099 | 26,298 | 886,671 |
| - | - | - | - | - | - | - | - | - | - | - | - | - |
| - | 10,000 | - | - | - | - | - | - | - | - | - | - | 10,000 |
| 549,109 | 358,500 | 308,250 | 623,250 | 309,500 | 565,000 | 438,500 | 579,500 | 621,250 | 554,250 | 818,500 | 417,750 | 6,143,359 |
| - | - | - | - | - | - | - | - | - | - | - | - | - |
| 49,700 | 110,794 | 157,107 | 262,851 | 156,449 | 53,707 | 73,065 | 204,440 | 179,255 | 368,042 | 67,786 | 169,136 | 1,852,332 |
| 2,272,147 | 2,518,118 | 2,236,135 | 3,228,367 | 2,278,325 | 3,949,237 | 2,049,468 | 2,337,084 | 2,462,701 | 2,386,693 | 2,750,311 | 1,956,436 | 30,425,021 |
| - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2,272,147 | 2,518,118 | 2,236,135 | 3,228,367 | 2,278,325 | 3,949,237 | 2,049,468 | 2,337,084 | 2,462,701 | 2,386,693 | 2,750,311 | 1,956,436 | 30,425,021 |


INTEREST PROVISION
BEGINNING TRUE-UP
ENDING TRUE-UP BEFORE
INTEREST
TOTAL BEGINNING \&
ENDING TRUE-UP
AVERAGE TRUE-UP
(LINE 3 TIMES 50\%)
INTER. RATE - 1ST DAY
OF REPORTING MONTH
INTER. RATE - 1ST DAY
OF SUBSEQUENT MONTH
TOTAL (SUM LINES 5 \& 6)
AVG INTEREST RATE
(LINE 7 TIMES 50\%)
MONTHLY AVG
INTEREST RATE
INTEREST PROVISION
(LINE 4 TIMES LINE 9)
(exp)/incl

## Program Description and Progress

Program Title: Residential Customer-Assisted Audit
Program Description: The Residential Customer-Assisted Energy Audit is designed to save energy by increasing residential customer awareness of natural gas energy use in personal residences. Savings are dependent on the customer implementing energy conservation measures and practice recommendations.
Program Accomplishments: January 1 to December 31, 2023
Number of customers participating: 9,576
Program Fiscal Expenditures: January 1 to December 31, 2023Actual expenses were $\$ 125,000$.
Program Progress Summary: Through this reporting period, 35,271 customers haveparticipated.

## Program Description and Progress

Program Title:

Program Description:

## Residential New Construction

The Residential New Construction Program is designed to encourage builders and developers to construct new single family and multi-family homes with the installation of energy efficient natural gas appliances to help reduce the new customer's energy consumption and conserve energy resources. The rebates offered to builders and developers under this program are designed to assist in defraying the added cost of gas piping and venting. The goal is to offer customer rebates for installing new energy efficient natural gas equipment.

Program Accomplishments: January 1 to December 31, 2023

| Appliance | Rebate Amount | Participants |
| :--- | :---: | :---: |
| Natural Gas Cooktop/Range | $\$ 300$ | 12,860 |
| Natural Gas Dryer | $\$ 200$ | 11,920 |
| Natural Gas Heating | $\$ 725$ | 28 |
| Natural Gas Energy Star Water Heater | $\$ 650$ | 4 |
| Natural Gas Tank Water Heater | $\$ 550$ | 2,242 |
| Natural Gas Tankless Water Heater | $\$ 700$ | 11,094 |

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 15,257,550$.

Program Progress Summary: Through this period, 218,620 customers have participated.

## Program Description and Progress

Program Title:

Program Description:

## Residential Retrofit

The Residential Retrofit Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing residences with the installation of energy efficient natural gas appliances to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy efficient natural gas equipment.

Program Accomplishments: January 1 to December 31, 2023

| Appliance | Rebate Amount | Participants |
| :--- | :---: | :---: |
| Natural Gas Cooktop/Range | $\$ 300$ | 258 |
| Natural Gas Dryer | $\$ 200$ | 167 |
| Natural Gas Heating | $\$ 725$ | 2 |
| Natural Gas Energy Star Water Heater | $\$ 650$ | 1 |
| Natural Gas Tank Water Heater | $\$ 550$ | 10 |
| Natural Gas Tankless Water Heater | $\$ 700$ | 404 |
| Natural Gas Heat Pump | $\$ 500 /$ ton | 0 |

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 400,050$.

Program Progress Summary: Through this period, 33,105 customers have participated.

## Program Description and Progress

Program Title:

Program Description:

## Residential Retention

The Residential Retention Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing residences with the installation of energy-efficient natural gas appliances to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy-efficient natural gas equipment.

Program Accomplishments: January 1 to December 31, 2023

| Appliance | Rebate Amount | Participants |
| :--- | :---: | :---: |
| Natural Gas Cooktop/Range | $\$ 100$ | 400 |
| Natural Gas Dryer | $\$ 150$ | 703 |
| Natural Gas Heating | $\$ 500$ | 2,098 |
| Natural Gas Energy Star Water Heater | $\$ 400$ | 47 |
| Natural Gas Tank Water Heater | $\$ 350$ | 3,582 |
| Natural Gas Tankless Water Heater | $\$ 550$ | 1,984 |

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 3,553,766$.

Program Progress Summary: Through this reporting period, 234,479 customers have participated.

## Program Description and Progress

Program Title:

Program Description:

Program Accomplishments: January 1 to December 31, 2023
Number of Customers Participating: 11

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 9,175$.

Program Progress Summary: Through this period, 11 customers have participated.

## Program Description and Progress

Program Title:

Program Description:

## Commercial New Construction

The Commercial New Construction Program is designed to encourage builders and developers to construct commercial and industrial facilities with the installation of energy efficient natural gas equipment to help reduce the new customer's energy consumption and conserve energy resources. The rebates offered to builders and developers under this program are designed to assist in defraying the added cost of gas piping and venting. The goal is to offer customer rebates for installing new energy-efficient natural gas equipment.

Program Accomplishments: January 1 to December 31, 2023

| Appliance | Rebate Amount | Participants |
| :--- | :---: | :---: |
| Natural Gas Cooktop/Range | $\$ 2,000$ | 206 |
| Natural Gas Dryer | $\$ 2,500$ | 27 |
| Natural Gas Fryer | $\$ 3,500$ | 137 |
| Natural Gas Tank Water Heater | $\$ 2,500$ | 9 |
| Natural Gas Tankless Water Heater | $\$ 3,500$ | 397 |

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 2,187,117$.

Program Progress Summary: Through this period, 1,842 customers have participated.

## Program Description and Progress

Program Title:

Program Description:

Commercial Retrofit

The Commercial Retrofit Program is designed to encourage current and new natural gas customers to make cost-effective improvements to existing commercial/industrial facilities with the installation of energy-efficient natural gas equipment to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy-efficient natural gas equipment.

Program Accomplishments: January 1 to December 31, 2023

| Appliance | Rebate Amount | Participants |
| :--- | :---: | :---: |
| Natural Gas Cooktop/Range | $\$ 2,000$ | 17 |
| Natural Gas Dryer | $\$ 2,500$ | 7 |
| Natural Gas Fryer | $\$ 3,500$ | 9 |
| Natural Gas Tank Water Heater | $\$ 2,500$ | 0 |
| Natural Gas Tankless Water Heater | $\$ 3,500$ | 225 |
| Natural Gas Heat Pump | $\$ 500 / t o n$ | 100 tons |

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 886,671$.

Program Progress Summary: Through this period, 2,781 customers have participated.

## Program Description and Progress

Program Title:
$\begin{array}{ll}\text { Program Description: } & \begin{array}{l}\text { The Commercial Retrofit Combined Heat and Power } \\ \text { Program is designed to encourage current and new } \\ \text { natural gas customers to make cost-effective } \\ \text { improvements to existing commercial/industrial } \\ \text { facilities with the installation of energy efficient natural } \\ \text { gas equipment to help reduce their energy } \\ \text { consumption and conserve energy resources. The } \\ \text { goal is to offer customer rebates for installing new } \\ \text { energy-efficient natural gas combined heat and power } \\ \text { equipment to utilize waste heat to displace portions of } \\ \text { natural gas usage for on-site heating, cooling, and } \\ \text { water heating. }\end{array}\end{array}$

Program Accomplishments: January 1 to December 31, 2023
Number of customers participating: 0

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 0$.

Program Progress Summary: Through this period, 7 customers have participated.

## Program Description and Progress

Program Title:

Program Description:

Program Accomplishments: January 1 to December 31, 2023
Total kw Displaced: 100

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 10,000$.

Program Progress Summary: Through this period, 60,581 kW have been displaced.

## Program Description and Progress

Program Title:

Program Description:

Commercial Retention

The Commercial Retention Program is designed to encourage current natural gas customers to make cost-effective improvements to existing commercial/industrial facilities with the installation of energy-efficient natural gas equipment to help reduce their energy consumption and conserve energy resources. The goal is to offer customer rebates for installing new energy-efficient natural gas equipment.

Program Accomplishments: January 1 to December 31, 2023

| Appliance | Rebate Amount | Participants |
| :--- | :---: | :---: |
| Natural Gas Cooktop/Range | $\$ 1,500$ | 238 |
| Natural Gas Dryer | $\$ 2,000$ | 97 |
| Natural Gas Fryer | $\$ 3,000$ | 1,696 |
| Natural Gas Tank Water Heater | $\$ 1,500$ | 12 |
| Natural Gas Tankless Water Heater | $\$ 2,000$ | 343 |

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 6,143,359$.

Program Progress Summary: Through this reporting period, 5,109 customers have participated.

## Program Description and Progress

Program Title:

| Program Description: | This program is in response to Rule $25-17.001$ (5) (f), <br> F.A.C., that requires the aggressive pursuit of <br> research, development and demonstration ("R\&D ") <br> projects "include both technological research, research <br> on load behavior and related problems and market- <br> related research." Rule 25-17.001(5), F.A.C., requires <br> aggressive R\&D be ""...an ongoing part of the practice <br> of every well managed utility's programs." This <br> program is also in support of FPSC Order No. 22176 <br> dated November 14, 1989, requiring utilities to <br> "...pursue research, development, and demonstration <br> projects designed to promote energy efficiency and <br> conservation." R\&D activity will be conducted on <br> proposed measures to determine the impact to the <br> company and its ratepayers and may occur at <br> customer premises, Peoples Gas System, Inc.'s <br> facilities or at independent test sites. |
| :--- | :--- |

Program Accomplishments: January 1 to December 31, 2023
Number of Research Projects: 0

Program Fiscal Expenditures: January 1 to December 31, 2023
Actual expenses were $\$ 0$.

Program Progress Summary: Peoples continues to review possible programs to research.

## Program Description and Progress

| Program Title: | Common Expenses |
| :--- | :--- |
| Program Description: | These are expenses common to all programs. |
| Program Fiscal Expenditures: | $\underline{\text { January } 1 \text { to December 31, 2023 }}$ |
|  | Actual expenses were $\$ 1,852,333$. |

