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| APPLICATION OF MONARCH            | § | BEFORE THE STATE OFFICE |
| UTILITIES I, L.P. TO CHANGE RATES | § | OF                      |
| FOR WATER AND SEWER SERVICE       | § | ADMINISTRATIVE HEARINGS |

REBUTTAL TESTIMONY

OF

GEORGE FREITAG, P.E.

ON BEHALF OF

MONARCH UTILITIES I, L.P.

AUGUST 31, 2016

297

**REBUTTAL TESTIMONY OF  
GEORGE FREITAG, P.E.**

**TABLE OF CONTENTS**

|  | <b>Page</b> |
|--|-------------|
| I. INTRODUCTION .....                              | .....3      |
| II. RESPONSE TO OPUC.....                          | .....5      |
| A. Annualization of Water Consumption .....        | .....5      |
| B. Annualization of Billed Sewer Consumption ..... | .....7      |
| C. Volumetric Usage Block.....                     | .....9      |
| D. Sewer Gallonage Charge.....                     | .....12     |
| III. RESPONSE TO COMMISSION STAFF.....             | .....13     |

**ATTACHMENTS:**

GF-1R                      Screen Shot of Errata Schedule II-H-1 with Formula Precedents

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APPLICATION OF MONARCH § BEFORE THE STATE OFFICE  
UTILITIES I, L.P. TO CHANGE RATES § OF  
FOR WATER AND SEWER SERVICE § ADMINISTRATIVE HEARINGS

REBUTTAL TESTIMONY OF  
GEORGE FREITAG, P.E.

1

I. INTRODUCTION

2 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A. My name is George Freitag. My business address is 1620 Grand Avenue Parkway,  
4 Suite 150, Pflugerville, TX 78660.

5 Q. DID YOU FILE DIRECT TESTIMONY IN THIS CASE?

6 A. Yes I did.

7 Q. PLEASE DESCRIBE THE PURPOSE OF YOUR REBUTTAL TESTIMONY.

8 A. The purpose of my rebuttal testimony is to provide information and correct erroneous  
9 points and recommendations made in the direct testimony of witnesses for the Office  
10 of Public Utility Counsel (OPUC) and the Public Utility Commission (Commission)  
11 Staff.

12 Q. WAS THIS TESTIMONY PREPARED BY YOU OR UNDER YOUR  
13 SUPERVISION?

14 A. Yes, it was.

15 Q. INsofar AS THIS TESTIMONY IS FACTUAL IN NATURE, DO YOU  
16 BELIEVE IT TO BE CORRECT?

17 A. Yes, I do.

1 Q. IN SO FAR AS THIS TESTIMONY IS IN THE NATURE OF OPINION OR  
2 JUDGMENT, DOES IT REPRESENT YOUR BEST PROFESSIONAL  
3 JUDGMENT?

4 A. Yes, it does.

5 Q. PLEASE SUMMARIZE THE SPECIFIC ISSUES THAT YOU ARE  
6 REBUTTING WITH THIS TESTIMONY?

7 A. First, I am responding to the recommendations made on behalf of OPUC by Chris  
8 Ekrut.

9 1. I disagree with Mr. Ekrut's recommendation that test year billed water  
10 consumption should be annualized. And furthermore, I disagree with his calculated  
11 annualization adjustment to Monarch's billed water volumes.

12 2. I disagree with his recommendation that test year sewer consumption be  
13 annualized.

14 3. I disagree with his recommendation that Monarch's volumetric usage block  
15 rates be restructured any differently from the existing structure currently used and  
16 proposed by Monarch to be used in the future.

17 4. I disagree with the recommendation that all of the sewer revenue increase be  
18 recovered through Monarch's billed Gallonage Charge.

19 Second, I am responding to the billing determinants used by Commission  
20 Staff Heidi Graham in her water rate recommendation.

1 **II. RESPONSE TO OPUC**

2 **A. Annualization of Water Consumption**

3 **Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH MR. EKRUT'S**  
4 **RECOMMENDATION REGARDING THE ANNUALIZATION OF BILLED**  
5 **WATER CONSUMPTION TO REFLECT THE NUMBER OF CUSTOMERS**  
6 **AT THE END OF THE TEST YEAR.**

7 A. First, I disagree that the water billing units need any additional annualization at all.  
8 Second, I do not think Mr. Ekrut's calculation of his recommended adjustment is  
9 accurate. And last, while recommending an annualization adjustment to billing units,  
10 Mr. Ekrut failed to properly recommend any corresponding annualization adjustments  
11 to cost of service.

12 **Q. WHY DO YOU DISAGREE THAT AN ANNUALIZATION ADJUSTMENT**  
13 **TO BILLED WATER VOLUMES IS NEEDED?**

14 A. Mr. Ekrut states that in calculating the billed volumes for prospective rates the  
15 projected billed volumes should reflect volumes from customers that were added  
16 during the test year.<sup>1</sup> As can be seen from the number of active connections shown in  
17 Schedule II-G-2.2(W), the number of bills for all the meter sizes as well as in Mr.  
18 Ekrut's Schedule CDE-10 attached to his testimony except for the 5/8 inch and 3/4  
19 inch metered customers did not increase at all from July 2014 to June 2015. There  
20 should be no annualization adjustment for customer use in the meter sizes that did not  
21 experience any increase in customers. The net increase of bills in the 5/8 inch and 3/4  
22 inch metered brackets (which are primarily residential customers) across the entire

---

<sup>1</sup> Direct Testimony of Chris Ekrut at 59.

1 test year was 387, or only 1.8%. As explained in the Direct Testimony of John Hutts,  
2 Monarch has already completed a detailed normalization adjustment based on a long-  
3 range trend analysis and has removed all water consumption associated with the Blue  
4 Mound and Midway systems. Therefore, no additional annualization adjustment is  
5 needed.

6 **Q. WHY IS MR. EKRUT'S PROPOSED ANNUALIZATION ADJUSTMENT TO**  
7 **WATER BILLED VOLUMES NOT ACCURATE?**

8 A. Mr. Ekrut went through a detailed, multi-step calculation of his proposed adjustment  
9 in Schedule CDE-10 using test-year-end customers. Based on a review of his  
10 calculations, it appears he used the monthly customer counts shown in Monarch  
11 Schedule II-G-2.2(W). However, merely taking the monthly number of customers  
12 from that schedule does not result in an accurate customer count for each month. As  
13 explained on Schedule II-G-2.2(W), some system read dates occur in overlapping  
14 months. This means that customers in the systems with out-of-sync billing periods  
15 were not included in the customer count for the month, but their consumption was  
16 included, although it was included in the following monthly totals.

17 After making his adjustment, Mr. Ekrut's resulting recommended increase in  
18 water billed volumes was an annual amount of 33,594,000 gallons. As noted above,  
19 Monarch experienced a net growth in active customers of 387 (mid-point of 194)  
20 across the test-year in the 5/8 and 3/4 inch meter groups. If those 194 customers were  
21 in place during a full year, then to consume the 33,594,000 additional gallons  
22 recommended by Mr. Ekrut, each one would have had to use an average each month  
23 of over 14,400 gallons, which is simply not reasonable, nor is it accurate.

1 **Q. DID MR. EKRUT MAKE ANY CORRESPONDING ANNUALIZATION**  
2 **ADJUSTMENTS TO WATER COST OF SERVICE?**

3 A. No. Although recommending a significant increase for annualization of test year  
4 gallons sold, Mr. Ekrut did not recommend any increase in costs for the same cost of  
5 service accounts. As can be seen in Errata Schedule II-D.1.2(S), Monarch provided  
6 several downward normalizing adjustments to the cost of service for the test year  
7 related to the loss of customers due to the sales of the Midway and Blue Mound  
8 systems. Monarch also made cost deductions to three accounts (Purchased Water,  
9 Purchased Power, and Chemicals) to reflect the weather normalization reduction in  
10 test year gallons sold. I do not think any annualization adjustments to billed volumes  
11 should be made at all; however, if any are ultimately adopted, then obviously  
12 corresponding annualization adjustments to Monarch's cost of service should be  
13 included as well.

14 **B. Annualization of Billed Sewer Consumption**

15 **Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH MR. EKRUT'S**  
16 **RECOMMENDATION REGARDING THE ANNUALIZATION TO BILLED**  
17 **SEWER CONSUMPTION TO REFLECT THE NUMBER OF CUSTOMERS**  
18 **AT THE END OF THE TEST YEAR.**

19 A. The same errors were made with the sewer annualization recommendation as were  
20 made with the development of Mr. Ekrut's water recommendation. I disagree that the  
21 sewer billing units need any additional annualization at all. Second, Mr. Ekrut's  
22 calculation of his recommended adjustment is not accurate. And last, while  
23 recommending an annualization adjustment to billing units, Mr. Ekrut failed to



1 properly recommend any corresponding annualization adjustments to Monarch's cost  
2 of service.

3 **Q. WHY DO YOU DISAGREE THAT AN ANNUALIZATION ADJUSTMENT**  
4 **TO SEWER BILLING UNITS IS NEEDED?**

5 A. As can be seen from the number of active connections shown in Schedule II-G-2.2(S)  
6 as well as in Mr. Ekrut's Schedule CDE-11, the number of bills for all meter sizes  
7 except for the 5/8 inch and 3/4 inch metered customers did not increase at all from  
8 July 2014 to June 2015. Because the customers for these meter sizes did not increase,  
9 there is no annualization adjustment necessary for customer use in those meter sizes.  
10 The net increase of bills in the 5/8 inch and 3/4 inch metered brackets (which are  
11 primarily residential customers) across the test year was 98, or 2.95%. Therefore, no  
12 additional annualization is needed.

13 **Q. WHY IS MR. EKRUT'S PROPOSED ANNUALIZATION ADJUSTMENT TO**  
14 **SEWER BILLING UNITS NOT ACCURATE?**

15 A. Again, Mr. Ekrut went through a detailed, multi-step calculation of his proposed  
16 adjustment in Schedule CDE-11 using test-year end customers. His resulting  
17 recommended increase was an annual amount of 4,386,000 gallons. As noted  
18 previously, Monarch experienced a net growth in active customers of 98 (average  
19 would be 49) across the test-year in the 5/8 and 3/4 inch meter group. If those 49  
20 customers were in place during a full year, then to reach the additional annualized  
21 volume of 4,386,000 gallons, each additional customer would have had to be billed  
22 on an average each month of 7,459 gallons, which is simply not reasonable or  
23 accurate.

1 **Q. DID MR. EKRUT MAKE ANY CORRESPONDING ANNUALIZATION**  
2 **ADJUSTMENTS TO SEWER COST OF SERVICE?**

3 A. No. Although recommending a significant increase for annualization of test year  
4 gallons sold, Mr. Ekrut did not recommend any increase in costs for the same cost of  
5 service accounts. As can be seen in Errata Schedule II-D.1.2(S), Monarch provided  
6 several downward normalizing adjustments to the cost of service for the test year  
7 related to the loss of customers due to the sale of the Blue Mound system, as well as  
8 cost deductions to allocated costs. I do not think any annualization adjustments to  
9 billed volumes should be made at all; however, if any are ultimately adopted, then  
10 obviously corresponding annualization adjustments to cost of service should be  
11 included as well.

12 **C. Volumetric Usage Block**

13 **Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH MR. EKRUT'S**  
14 **RECOMMENDATION TO RESTRUCTURE MONARCH'S USAGE BLOCK**  
15 **RATES FROM THE STRUCTURE CURRENTLY USED AND PROPOSED**  
16 **BY MONARCH TO BE USED IN THE FUTURE.**

17 A. Monarch has proposed to retain its current rate structure. It is a fundamental part of  
18 our rate change application that customers subject to the increases are uniformly  
19 impacted; that is, no customer group subject to increases is unduly burdened  
20 compared to any other customer group. This is very apparent in the data provided in  
21 Schedule II-G-1.3(W), which shows the percentage increases from the present rates to  
22 the proposed rates for various monthly usage amounts and meter sizes to be the same  
23 for all customer groups.

1 **Q. PLEASE EXPLAIN THE BACKGROUND FOR MONARCH'S EXISTING**  
2 **TIERED RATE STRUCTURE.**

3 A. Monarch has used the four tier rate structure since January 1, 2013. The four tiers  
4 and the rates themselves were negotiated and agreed upon by all parties in Texas  
5 Commission on Environmental Quality Docket 37049-R. All subsequent rate  
6 changes by Monarch have been uniformly applied across the tiers so that the  
7 percentage increase to all customer groups was very much the same.

8 **Q. ARE YOU FAMILIAR WITH THE TEXAS WATER DEVELOPMENT**  
9 **BOARD'S WATER CONSERVATION BEST PRACTICES GUIDE THAT**  
10 **MR. EKRUT USES AS THE BASIS FOR HIS RECOMMENDED CHANGE**  
11 **TO MONARCH'S WATER RATE STRUCTURE?**

12 A. Yes, I am. In 2004, I was part of the consulting team that worked with the Texas  
13 Water Development Board to prepare the Best Management Practices Guide (BMP)  
14 for the Texas Water Conservation Implementation Task Force. The price increase  
15 guideline for block structure pricing that Mr. Ekrut cites does come from the Water  
16 Conservation Pricing BMP, and it is a recommendation suited for situations where  
17 utilities may be considering a new block rate structure. What he doesn't mention,  
18 however, is that the specific recommendation, as well as the larger context of the  
19 whole BMP, is that the guidelines are voluntary measures and are to be used in  
20 conjunction with other BMPs by utilities that are seeking to improve their water  
21 efficiency practices.

1 **Q. DOES MONARCH'S CURRENT WATER RATE STRUCTURE MEET THE**  
2 **REQUIREMENTS OF A WATER CONSERVATION RATE?**

3 A. Yes, it does. Monarch's existing water rate structure complies with 16 Tex. Admin.  
4 Code § 24.32(b)(1), which states: "In order to encourage the prudent use of water or  
5 promote conservation, water and sewer utilities shall not apply rate structures which  
6 offer discounts or encourage increased usage within any customer class."

7 We have shown through other witnesses that the general per capita usage for  
8 Monarch is trending downward. Overall, Monarch's systems are small and rural in  
9 nature, and the average monthly consumption levels, especially for residential meters,  
10 are not high. In fact, as can be seen in Monarch's Schedule II-G-1.4(W), about two-  
11 thirds of all bills in the test year were for a monthly usage of 4,000 gallons or less.  
12 We are very aware of the need for wise management of our water supplies; however,  
13 it is my opinion that a change to the block rates recommended by Mr. Ekrut is not a  
14 measure required to further foster water conservation.

15 **Q. WHAT EFFECT WILL THE RATE STRUCTURE PROPOSED BY MR.**  
16 **EKRUT HAVE ON THE VARIOUS USER WATER RATES?**

17 A. The proposed restructuring of the rates within the rate tier recommended by Mr. Ekrut  
18 is simply an attempt to shift more of the revenue burden to customers with higher  
19 monthly usage. As can be seen in Monarch's Schedule II-G-1.4(W), 94% of all bills  
20 in the test year were for usage in the first two tiers. Furthermore, it is shown on that  
21 schedule that the percentage of revenues from test year customers with bills in the  
22 highest three tiers is higher than the percentage of customers within those highest  
23 three tiers. The changes in block rate structure proposed by Mr. Ekrut will just make

1 a small number of customers, with monthly bills in the highest tiers, even more  
2 disproportionately responsible for cost of service revenues.

3 **D. Sewer Gallonage Charge**

4 **Q. PLEASE EXPLAIN THE BACKGROUND FOR MONARCH'S EXISTING**  
5 **SEWER RATE STRUCTURE?**

6 A. Prior to 2012, Monarch charged for sewer service based on a uniform monthly flat  
7 rate for residential customers and a monthly base rate and gallonage charge for  
8 commercial customers. We have used the current sewer rate structure since it became  
9 effective on June 1, 2012. This structure, which has a monthly base rate and single  
10 usage rate, is based on winter average water use for residential customers and actual  
11 water use for non-residential customers. The rates and structure were negotiated and  
12 agreed upon by all parties in Texas Commission on Environmental Quality Docket  
13 37050-R. All subsequent rate changes by Monarch have been uniformly applied to  
14 both the base and gallonage charge so that the percentage increase to all customer  
15 groups was very close to the same.

16 **Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH THE CHANGE TO THE**  
17 **SEWER RATE STRUCTURE PROPOSED BY MR. EKRUT?**

18 A. Mr. Ekrut is proposing that all of the sewer revenue increase be recovered through an  
19 increase to the gallonage charge with no increase to the monthly base charge. This  
20 again is essentially an attempt to shift more of the burden of recovering the costs of  
21 providing sewer service to a small number of customers with higher water  
22 consumption. His recommendation is contrary to the rate structure that was agreed  
23 upon in previous settlements with the customers and OPUC.

1 It is a fundamental part of Monarch's rate change application that customers  
2 subject to the increases be uniformly impacted; that is, no customer group subject to  
3 increases is unduly burdened compared to any other customer group. This is very  
4 apparent in the data provided in Schedule II-G-1.3(S), which shows the percentage  
5 increase from the present rates to the proposed rates for various monthly usage  
6 amounts and meter sizes to be the same for all customer groups.

7 **Q. WHAT EFFECT WILL THE RATE STRUCTURE PROPOSED BY MR.  
8 EKRUT HAVE ON THE VARIOUS SEWER CUSTOMERS?**

9 A. It is important to note that residential customers are billed for sewer based on winter  
10 months average water use. As can be seen in Monarch's Schedule II-G-1.4(S), 50%  
11 of all bills in the test year were for usage of less than 3,000 gallons. The changes in  
12 block rate structure proposed by Mr. Ekrut will just make that small number of  
13 customers with monthly bills in the highest usage range even more disproportionately  
14 responsible for cost of service revenues.

15 **III. RESPONSE TO COMMISSION STAFF**

16 **Q. PLEASE EXPLAIN WHY YOU DISAGREE WITH THE RATE DESIGN  
17 TESTIMONY OF COMMISSION STAFF WITNESS HEIDI GRAHAM?**

18 A. Ms. Graham has selected the wrong schedule to use for her rate design testimony.  
19 The correct schedules to use are Schedule III (W) and Schedule III (S). She  
20 erroneously used Scheduled II-H-1, which is the Cost of Service schedule, and which  
21 was prepared for an entirely different purpose than rate design. Mr. Robert Kelly's

1       direct testimony describes the approach Monarch took in the preparation of Schedule  
2       II-H-1, and I will not restate that testimony here.<sup>2</sup>

3               Another error in her testimony is at page 16 with regard to the weather  
4       normalization adjustment to test year gallons. Although Ms. Graham claims that  
5       Monarch's adjustment by John Hutts was incorrectly applied to Monarch's usage, she  
6       is mistaken; there is not an error at all.

7               When one looks at the fourth page of the Errata Schedule II-H-1 (page 124 of  
8       the rate filing package), you can see that in her calculations, Ms. Graham went across  
9       the page for rows 94 through 98. However, she apparently did not notice that  
10      Columns (h) and (i) of those rows *included* the Contractual Usage numbers for  
11      residential and non-residential from rows 108 through 111 (Columns (j) and (k)). Ms.  
12      Graham stated she was correcting the data in Schedule II-H-1, but she misunderstood  
13      that data.

14              Monarch made no mistake; Mr. Hutts' 2.1% adjustment was subtracted, and  
15      then the contractual volumes were added after the adjustment to result in the  
16      normalized usage including contractual volumes. In fact, the heading for rows 94  
17      through 98, Columns (h), (i), and (j), as shown on row 93, states "Normalized Usage  
18      (Including Contractuals)." Monarch sent the electronic version of this Schedule II-H-  
19      1 to Staff, at Staff's request. The formula dependents in the electronic schedule  
20      clearly show how Monarch added in the contractuals after the 2.1% adjustment. I  
21      have attached a screen shot of the electronic spreadsheet that shows how the formula

---

<sup>2</sup> Direct Testimony of Robert L. Kelly, at 16-17.

1 precedents track as I have described above, as Attachment GF-1R. A more concise  
2 summary of this is shown below:

| Reference Schedule II-H-1                        | Res.     | Comm.   |           |
|--|----------|---------|-----------|
| Non-Contractual Customers<br>Col (d)-(e) Line 99 | 896,564  | 155,574 |           |
| Adjustment<br>Col (f)-(g) Line 998               | (18,827) | (3,268) |           |
| Contractual Customers<br>Col (j)-(k) Line 112    | 112,573  | 12,571  |           |
| Col (h) - (j) Line 99                            | 990,310  | 164,877 | 1,155,187 |

3 The total gallons of 1,155,187 corresponds to Column (e), Line 289 on  
4 Schedule III (W). As can be seen in the above table and on the Attachment GF-1R,  
5 contractual customers were included in the total number of customers used in the  
6 calculations and the 2.1% was correctly subtracted.

7 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

8 A. Yes.



Monarch Utilities I, L.P.  
 Docket No. 45570  
 Test Year Ending 6/30/2015  
 Errata - Schedule II-H-1 Cost of Service  
 Witness: Robert Kelly

**MONARCH UTILITIES I, LP  
 COST OF SERVICE STUDY (TY 7/2014 - 6/2015)**

Line No. (a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k)

**WATER USAGE CHARGE REVENUE CALCULATION**

| All Usage  | 7/14 - 6/15 Recorded Usage |                 | Adjustment  |                 | Normalized Usage (Including Contractuals) |                 | TOTAL        |
|--|----------------------------|-----------------|-------------|-----------------|---|-----------------|--------------|
|  | Residential                | Non-Residential | Residential | Non-Residential | Residential                               | Non-Residential |              |
| In Thousand Gallons                                |                            |                 |             |                 |   |                 |              |
| Tier 1 0 - 2                                       | 374,349                    | 28,749          | (7,664)     | (684)           | 397,672                                   | 29,353          | 427,024      |
| Tier 2 2,001 - 10                                  | 457,436                    | 52,867          | (9,606)     | (1,109)         | 493,621                                   | 53,570          | 547,191      |
| Tier 3 10,001 - 20                                 | 57,622                     | 9,988           | (1,197)     | (216)           | 62,317                                    | 16,257          | 78,574       |
| Tier 4 Over 20,001                                 | 7,757                      | 64,631          | (163)       | (1,345)         | 36,766                                    | 85,898          | 102,398      |
|  | 896,564                    | 155,574         | (18,827)    | (3,268)         | 390,310                                   | 184,877         | 1,155,187    |
| Percentage   |                            |                 |             |                 | 86.0%                                     | 14.0%           | 100.0%       |
| Variable Expenses                                  |                            |                 |             |                 | \$ 8,448,866.45                           | \$ 1,375,397    | \$ 9,824,263 |
| Adjustment for Cost of Service per Original Filing |                            |                 |             |                 |   |                 | (48,768)     |
| Variable Expenses per Original Filing              |                            |                 |             |                 | \$ 8,406,926                              | \$ 1,368,569    | \$ 9,775,495 |

| Contractual Usage   | 7/14 - 6/15 Recorded Usage                               |        | INHE        |                 | PMCK        |                 | Total Contractual |                 |
|---------------------|--|--------|-------------|-----------------|-------------|-----------------|-------------------|-----------------|
|                     | Lakeshore<br>Pinnacle & Cedar<br>View<br>Non-Residential | INHE   | Residential | Non-Residential | Residential | Non-Residential | Residential       | Non-Residential |
| In Thousand Gallons |  |        |             |                 |             |                 |                   |                 |
| Tier 1 0 - 2        | 9,691  | 22,701 | 9,249       | 442             | 21,935      | 766             | 31,184            | 1,208           |
| Tier 2 2,001 - 10   | 9,411  | 38,252 | 9,136       | 275             | 36,655      | 1,597           | 45,791            | 1,872           |
| Tier 3 10,001 - 20  | 1,022  | 6,562  | 1,000       | 22              | 5,492       | 1,070           | 6,492             | 6,479           |
| Tier 4 Over 20,001  | 545  | 31,573 | 420         | 125             | 28,686      | 2,887           | 29,106            | 3,012           |
|                     | 5,387  | 99,088 | 19,805      | 864             | 60,475      | 38,613          | 112,573           | 12,571          |