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COMMISSION

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KNOTT COUNTY WATER )  
AND SEWER DISTRICT FOR AN ) CASE NO. 2019-00268  
ALTERNATIVE RATE ADJUSTMENT )

**MOTION FOR REHEARING**

Pursuant to KRS 278.400, Letcher County Water and Sewer District (“Letcher District”) moves for rehearing the Commission’s Order of January 31, 2020 on the level of employee health insurance expense and employee health insurance waiver credit expense included in Knott County Water and Sewer District’s (“Knott District”) revenue requirement.

Letcher District respectfully submits that: (1) the Commission’s findings regarding Knott District’s health insurance expense conflict with the evidence of record; and (2) the Commission findings regarding the level of Knott District’s reasonable employee health insurance expense and health insurance waiver credit expense is inconsistent with prior Commission decisions and should be modified to conform with those decisions.

**The Commission’s findings regarding the level of employee health insurance expense conflict with the evidence of record.**

In its Order of January 31, 2020, the Commission found that Knott District’s proforma monthly premium for employee health insurance was \$7,398. It determined this level of expense by applying the total premium required for each employee’s insurance coverage and then subtracting the employee contribution recommended by Kentucky Employees Health Plan (“KEHP”) for such coverage. The Commission calculated the expense based upon eight Knott District’s water division employees receiving health insurance coverage and found monthly

proforma employee health insurance was \$7,398 and the annual proforma employee health insurance was \$88,776.

For the test period, Knott District reported a total of 13-full time employees. One of its employees was assigned to its wastewater operations,<sup>1</sup> leaving 12 full time employees for Knott District's water operations.<sup>2</sup> Of these twelve employees, three employees did not receive insurance coverage and instead received a health insurance waiver credit.<sup>3</sup> This leaves a total of nine employees who received health insurance coverage. It appears that the Commission excluded one employee from its calculations.<sup>4</sup>

Based upon the information that Knott District provided in response to requests for information, Letcher District calculates the actual total premium amount for the test period for Knott District's water operations as \$121,252. These premiums annualized<sup>5</sup> would be \$122,710 and would result in a total monthly premium amount of \$10,225. Using the approach adopted by the Commission in its Order of January 31, 2020, and removing the recommended KEHP employee contribution is from these amounts results in a proforma monthly total of \$7,981 and proforma annual total of \$95,774. would result. Letcher District's calculations are shown in Exhibit A to this Motion.

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<sup>1</sup> VR: 01/22/2020; 14:06:41 – 14:07:45. See also *Annual Report of Knott County Water and Sewer District to the Public Service Commission of the Commonwealth of Kentucky for the Calendar Year Ended December 31, 2018 – Sewer Division* ("2018 Annual Sewer Report") at Ref Page 1.

<sup>2</sup> *Annual Report of Knott County Water and Sewer District to the Public Service Commission of the Commonwealth of Kentucky for the Calendar Year Ended December 31, 2018 – Water Division* ("2018 Annual Water Report") at Ref Page 5.

<sup>3</sup> See Knott County Water and Sewer District's Response to Letcher County Water and Sewer District and the City of Hindman's First Request for Information, Item 14.

<sup>4</sup> See Order of January 31, 2020 at 30. The Order of January 31, 2020 incorrectly states the monthly premium for Living Well CDHP-Couple coverage and the Living Well-CDHP-Family coverage as \$1,334 and \$1,490 respectively. According to the KEHP Schedule of Benefits, the monthly premiums are \$1,325.64 and \$1,479.76 respectively. This schedule is available at <https://personnel.ky.gov/KEHP/2018%20Benefits%20Selection%20Guide.pdf>. and is attached to this Motion as Exhibit C.

<sup>5</sup> The premiums must be annualized since one Knott District employee received insurance coverage for only ten months of the test period.

**The Commission's decision to base the level of allowable health insurance expense and employee health insurance waiver credit expense on the provisions in Knott District's Contract with KEHP conflicts with prior Commission decisions.**

Over the last three years, the Commission has consistently found that the reasonable level of a utility's employee health insurance expense should be based upon the national average employer contribution rate as reported by the Bureau of Labor Statistics.<sup>6</sup> In its most recent survey of employee benefits in the United States, the Bureau of Labor Statistics reported that national average for an employer's share of health insurance premiums was 79 percent for single coverage and 62 percent for family coverage.<sup>7</sup> The Commission has found that any costs that a utility incurred to pay a higher share than the national average were unreasonable and should not be permitted to be recovered through utility rates.

Typical of the Commission's reasoning is that expressed in Case No. 2017-00070 when the Commission disallow a portion of a water district's employee health insurance expense:

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<sup>6</sup> , *Electronic Application of North Mercer Water District For Rate Adjustment Made Pursuant To 807 KAR 5:076*, Case No. 2016-00325 (Ky. PSC May 19, 2017); *Application for Rate Adjustment of Nebo Water District*, Case No. 2016-00435 (Ky. PSC June 5, 2017); *Electronic Application of Monroe County Water District for Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2017-00070 (Ky. PSC Jan. 12, 2018); *Application of Western Lewis-Rectorville Water and Gas District For A Rate Adjustment For Small Utilities Pursuant to 807 KAR 5:076*, Case No. 2017-00074 (Ky. PSC Oct. 18, 2017); *Electronic Application of Breathitt County Water District for An Alternative Rate Adjustment*, Case No. 2017-00140 (Ky. PSC Sep. 15, 2017); *Electronic Application of Estill County Water District No. 1 for a Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2017-00176 (Ky. PSC Dec. 20, 2017); *Electronic Application of Letcher County Water and Sewer District for Alternative Rate Adjustment*, Case No. 2017-00211 (Ky. PSC Nov. 21, 2017); *Application of West McCracken Water District for an Alternative Rate Adjustment*, Case No. 2017-00319 (Ky. PSC Jan. 30, 2018); *Application of Jonathan Creek Water District for a Rate Adjustment*, Case No. 2017-00323 (Ky. PSC Dec. 21, 2017); *Application of South Hopkins Water District for An Alternative Rate Adjustment*, Case No. 2017-00420 (Ky. PSC Mar. 30, 2018); *Application of Green-Taylor Water District for An Alternative Rate Adjustment*, Case No. 2018-00030 (Ky. PSC Aug. 17, 2018); *Application of North Hopkins Water District for a Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2018-00118 (Ky. PSC Aug. 16, 2018); *Application of Western Lewis-Rectorville Water and Gas District for a Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2018-00321 (Ky. PSC Mar. 20, 2019); *Application of Muhlenberg County Water District No. 3 For Rate Adjustment For Small Utilities Pursuant to 807 KAR 5:076*, Case No. 2018-000346 (Ky. PSC Apr. 8, 2019); *Application of Crittenden-Livingston County Water District for an Alternative Rate Adjustment*, Case No. 2018-00414 (Ky. PSC May 23, 2019); *Application of Southern Water District for An Alternative Rate Adjustment*, Case No. 2019-00131 (Ky. PSC Nov. 7, 2019)

<sup>7</sup> Bureau of Labor Statistics, *National Compensation Survey: Employee Benefits in the United States, March 2019* (Sept. 2019) at 36.

In recent Orders, the Commission has made ratemaking adjustments to reduce the cost of employee benefit packages paid by some utilities when certain aspects of those benefits packages were found to be unreasonable based on a review of total salaries and fringe benefits. The Commission is placing greater emphasis on evaluating employees' total compensation packages, including both salary and benefits programs for market and geographic competitiveness to ensure the development of fair, just, and reasonable rates.

The Commission has found that in most cases 100 percent employer-funded healthcare does not meet those criteria. Absent a utility's requirement of reasonable employee participation in healthcare costs, the Commission has applied a consistent standard by utilizing the Bureau of Labor Statistics report, which reflects an average employee contribution to single healthcare coverage of 21 percent of cost. Accordingly, the Commission finds that Employee Health Insurance Premiums should be reduced by 21 percent for single healthcare coverage. . .<sup>8</sup>

Knott District acknowledged providing single health insurance coverage to its water employees without requiring any employee contribution and to requiring employees who have family coverage to pay no more than 20 percent of the total premium. As shown in Exhibit B, had the national average for an employer's share of employee health insurance premiums been used, Knott District's allowable employee health insurance expense would be only \$83,255.<sup>9</sup> Instead of following its consistently expressed position on this expense, however, the Commission chose to use the KEHP-recommended employer contribution rate to determine the reasonable level of employee health insurance expense.

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<sup>8</sup> *Electronic Application of Monroe County Water District for Rate Adjustment Pursuant to 807 KAR 5:076*, Case No. 2017-00070 (Ky. PSC Jan. 12, 2018) at 13-14.

<sup>9</sup> The Commission's holding in *Electronic Application of Jackson Purchase Energy Corporation for A General Adjustment in Existing Rates*, Case No. 2019-00053 (Ky. PSC June 20, 2019) is not applicable to this proceeding. In *Jackson Purchase Energy Corporation*, the Commission stated that "as long as the employee contribution rate for health insurance is at least 12 percent, it will not make a further adjustment to the national average. If a utility's employees' health insurance contribution is less than 12 percent, the Commission will adjust all contributions to the national average." *Id.* at 9. As shown in Table 2, five of the nine Knott District employees receiving health insurance make no contribution to health insurance costs. Total annualized employee contributions to health insurance premiums represents only 10.97 percent of total annualized employee health insurance costs for



The Commission applied the same approach when reviewing Knott District's expenses related to its health insurance waiver credit. Knott District provided this credit to three employees who did not obtain health insurance coverage through their employer's insurance plan. The credit was equal to the premium for Standard CDHP Single coverage. The Commission disallowed a portion of this credit and permitted rate recovery only of the KEHP-recommended employer contribution rate. The Commission did not use the national average for an employer's share of employee health insurance premiums to determine the level of the health insurance waiver credit that was reasonable. If the national average for an employer's share had been used, allowed level of health insurance waiver credit expense would have been reduced by an additional \$5,415 for a total disallowance of \$7,128.<sup>10</sup>

No explanation for the deviation from prior Commission decisions on employee health insurance expense was provided other than a brief reference to "the nature of the [Knott District's] contracted rates with KEHP."<sup>11</sup> This reference suggests that the decision to limit the disallowance of employee health insurance expense to KEHP's required employer contribution rate is based solely upon the testimony of a Knott District witness who testified that the water district's contract with KEHP prohibits employee contributions greater than the KEHP recommended rate.<sup>12</sup>

The record offers no support as to the actual contents of the agreement between KEHP and Knott District. No copy of the contract has been offered into the evidence of record in this proceeding. Commission Staff in its Report does not indicate that it examined the agreement or made any effort to verify the agreement's contents.

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<sup>10</sup> \$8,194 (Health Insurance Water Credit) x 3 Employees = \$24,582  
\$24,582 x .71 (National Average Employer Share) = \$17,454  
\$24,582 - \$17,454 = \$7,128 (Total Disallowance if National Average Employer Share Used)

<sup>11</sup> Order at 31.

<sup>12</sup> VR: 01/22/2020; 14:11:23 – 14:12:07.

Assuming Knott District's agreement with KEHP establishes limits on employee contributions, it cannot limit the Commission's power to disallow unreasonable expenses. The Commission is not a party to the agreement and therefore is not bound by its terms. Moreover, the Commission has plenary authority over utility rates and services<sup>13</sup> and has the statutory duty to set fair, just and reasonable rates.<sup>14</sup> Neither a utility nor any other entity can bind the Commission in the exercise of its ratemaking powers by agreement or restrict the Commission in the exercise of its ratemaking powers.<sup>15</sup>

Disallowance of the portion of Knott District's employee health insurance expense exceeding the national average for an employer's share of employee health insurance premiums does not prevent Knott District from complying with the terms of its agreement with KEHP. An order disallowing such costs does not require Knott District to obtain a greater share of employee health insurance premiums from its employees or to terminate its current benefit package. Such an order merely prevents unreasonable costs from being passed on to Knott District's ratepayers. Knott District may use the revenues produced by its rates in any manner that it deems appropriate, including assuming a larger share of employee health insurance costs.

The proposition that a contract between a utility and its vendors may limit the Commission's authority to disallow unreasonable expenses resulting from that contract is antithetical to utility regulation. Under such approach, the Commission could not disallow any unreasonable costs associated with a utility's unreasonable or imprudent procurement decisions because the utility's contract requires payment of the contract price, even if the price is excessive or extravagant or the purchase is unnecessary or uneconomical. Courts have long recognized that

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<sup>13</sup> *Kentucky Public Service Commission v. Commonwealth ex rel. Conway*, 324 S.W.3d 323 (Ky. 2010).

<sup>14</sup> KRS 278.040.

<sup>15</sup> *Bd. of Educ. v. William Dohrman, Inc.*, 620 S.W.2d 328 (Ky.App. 1981).

“regulation cannot be frustrated by a requirement that the rate be made to compensate extravagant or unnecessary costs for these or other purposes.”<sup>16</sup> The Commission has on numerous occasions disallowed expenses as unreasonable that were incurred under a contractual agreement between a utility and another entity and reviewing Kentucky courts have affirmed those disallowances.<sup>17</sup>

Based upon the Commission’s prior decisions regarding the employee health insurance expense, the level of health insurance expense and of the health insurance waiver credit allowed in the Order of January 31, 2020 is unreasonable. To be consistent with those previous Commission decisions, the revenue requirement set forth in the Order of January 31, 2020 should be reduced by additional \$17,934.

WHEREFORE, Letcher District moves that the Commission grant rehearing on its Order of January 31, 2020 on the issues of employee health insurance expense and health insurance waiver credit expense, amend its Order of January 30, 2020 to conform with its earlier decisions regarding these expenses, and revised the rates set forth in that Order to reflect a reduction of \$17,934 in Knott District’s revenue requirement from rates.

Dated: February 21, 2020

Respectfully submitted,



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<sup>16</sup> *Acker v. United States*, 298 U.S. 426, 430-31 (1936).

<sup>17</sup> *See, e.g., South Central Bell Telephone v. Public Service Commission*, 702 S.W.2d 447 (Ky.App. 1985) (disallowing expenses incurred under a licensing contract);

### CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that on January 21, 2020 a true and accurate copy of this Motion for Rehearing was transmitted by electronic mail to the following:

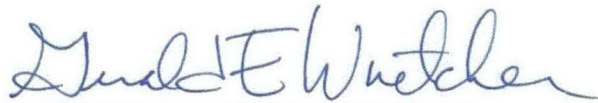
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## EXHIBIT A

Name	Type	Total Premium (Monthly)	Total Premium Test Year Actual	Total Premium (Annualized)	KEEP Recommended Employee Contribution (Monthly)	KEHP Recommended Employee Contribution Test Year Annual	KEHP Recommended Employee Contribution (Annualized)
Jacobs, Benny	Living Well CDHP - Couple	\$ 1,325.64	\$ 15,907.68	\$ 15,907.68	\$ 34.12	\$ 4,177.44	\$ 4,177.44
Hall, Jerry	Standard CDHP - Family	\$ 1,615.30	\$ 19,383.60	\$ 19,383.60	\$ 312.06	\$ 3,744.72	\$ 3,744.72
Hopkins, James M.	Living Well CDHP - Single	\$ 709.46	\$ 8,513.52	\$ 8,513.52	\$ 49.42	\$ 593.04	\$ 593.04
Shrum, Roger	Living Well PPO - Family	\$ 1,767.60	\$ 21,211.20	\$ 21,211.20	\$ 662.26	\$ 7,947.12	\$ 7,947.12
Gibson, Chad	Living Well CDHP - Family	\$ 1,479.76	\$ 17,757.12	\$ 17,757.12	\$ 348.12	\$ 4,177.44	\$ 4,177.44
Catron, Matt	Living Well PPO - Cross-Ref	\$ 876.68	\$ 10,520.16	\$ 10,520.16	\$ 157.56	\$ 1,890.72	\$ 1,890.72
Slone, Gavin	Living Well PPO -Single	\$ 729.34	\$ 7,293.40	\$ 8,752.08	\$ 82.38	\$ 823.80	\$ 988.56
Wilder, Nathaniel	Standard PPO - Single	\$ 685.00	\$ 8,220.00	\$ 8,220.00	\$ 49.92	\$ 599.04	\$ 599.04
Salmons, Jared	Living Well PPO -Parent Plus	\$ 1,037.08	\$ 12,444.96	\$ 12,444.96	\$ 234.82	\$ 2,817.84	\$ 2,817.84
<b>Total</b>		<b>\$ 10,225.86</b>	<b>\$121,251.64</b>	<b>\$ 122,710.32</b>	<b>\$ 2,244.66</b>	<b>\$ 26,771.16</b>	<b>\$ 26,935.92</b>

Total Premium Annualized = Total Monthly Premium x 12

KEHP Recommended Contribution Annualized = KEHP Recommended Employee Contribution (Monthly) x 12

Total Proforma Employer Health Insurance Expense = \$121,251.64 – 26,935.92 = **\$95,774**

Sources: KEHP 2018 Open Enrollment Guide (Exhibit C)

Knott District's Response to Letcher District and Hindman's First Request for Information, Item 14

## EXHIBIT B

Name	Type	Total Premium (Annualized)	Annualized Employee Contribution	Actual Employer Contribution	Annualized Employer Contribution	PSC Employer Contribution
Jacobs, Benny	Living Well CDHP - Couple	\$ 15,907.68	\$ 3,181.54	\$ 12,726.14	\$ 12,726.14	\$10,499.07
Hall, Jerry	Standard CDHP - Family	\$ 19,383.60	\$ 0.00	\$ 19,383.60	\$ 19,383.60	\$12,793.18
Hopkins, James M.	Living Well CDHP – Single*	\$ 8,513.52	\$ 0.00	\$ 8,513.52	\$ 8,513.52	\$ 6,725.68
Shrum, Roger	Living Well PPO – Family	\$ 21,211.20	\$ 4,242.24	\$ 16,968.96	\$ 16,968.96	\$13,999.39
Gibson, Chad	Living Well CDHP – Family	\$ 17,757.12	\$ 3,551.42	\$ 14,205.70	\$ 14,205.70	\$11,719.70
Catron, Matt	Living Well PPO - Cross-Ref	\$ 10,520.16	\$ 0.00	\$ 10,520.16	\$ 10,520.16	\$ 7,048.51
Slone, Gavin	Living Well PPO -Single*	\$ 8,752.08	\$ 0.00	\$ 7,293.40	\$ 8,752.08	\$ 5,761.79
Wilder, Nathaniel	Standard PPO – Single*	\$ 8,220.00	\$ 0.00	\$ 8,220.00	\$ 8,220.00	\$ 6,493.80
Salmons, Jared	Living Well PPO (Parent Plus)	\$ 12,444.96	\$ 2,488.99	\$ 9,955.97	\$ 9,955.97	\$ 8,213.67
<b>Total</b>		<b>\$122,710.32</b>	<b>\$13,464.19</b>	<b>\$107,787.45</b>	<b>\$109,246.13</b>	<b>\$83,254.78</b>

\* Considered Single Coverage; All Others Consider Family Coverage

PSC Employer Contribution (Single Coverage) = Total Annualize Premium x .79

PSC Employer Contribution (Family Coverage) = Total Annualize Premium x .68

Column Labelled "PSC Employer Contribution" represents Knott District's share of total premium if the Bureau of Labor Statistics National Average for an Employer's Share of Employee Health Insurance Premiums were used

Source: Knott District's Response to Letcher District and Hindman's First Request for Information, Item 14



EXHIBIT C

# Your 2018 Open Enrollment Guide

Benefits Selection Guide for the Kentucky Employees' Health Plan and Kentucky Group Life Insurance



**2018 Open Enrollment Oct. 9 – Oct. 20**

**Benefit Fairs begin Oct. 2**

Health Insurance Open Enrollment is **MANDATORY**

Life Insurance Open Enrollment is **VOLUNTARY**

*Living* **Well** Promise for 2018

Take the Go365™ Health Assessment  
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# 2018 Monthly Premiums and Contributions

## Non-Tobacco User Rates

All employee contributions are per employee, per month

LivingWell CDHP	Total Premium	Completing LivingWell Promise Rates		Without Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution	Employer Contribution	Employee Contribution
Single	\$709.46	\$660.04	<b>\$49.42</b>	\$620.04	<b>\$89.42</b>
Parent Plus	\$978.50	\$851.84	<b>\$126.66</b>	\$811.84	<b>\$166.66</b>
Couple	\$1,325.64	\$1,029.02	<b>\$296.62</b>	\$989.02	<b>\$336.62</b>
Family	\$1,479.76	\$1,131.64	<b>\$348.12</b>	\$1,091.64	<b>\$388.12</b>
Family Cross-Reference	\$818.96	\$738.64	<b>\$80.32</b>	\$698.64	<b>\$120.32</b>

LivingWell PPO	Total Premium	Completing LivingWell Promise Rates		Without Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution	Employer Contribution	Employee Contribution
Single	\$729.34	\$646.96	<b>\$82.38</b>	\$606.96	<b>\$122.38</b>
Parent Plus	\$1,037.08	\$802.26	<b>\$234.82</b>	\$762.26	<b>\$274.82</b>
Couple	\$1,589.10	\$1,060.74	<b>\$528.36</b>	\$1,020.74	<b>\$568.36</b>
Family	\$1,767.60	\$1,105.34	<b>\$662.26</b>	\$1,065.34	<b>\$702.26</b>
Family Cross-Reference	\$876.68	\$719.12	<b>\$157.56</b>	\$679.12	<b>\$197.56</b>

Standard PPO	Total Premium	Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution
Single	\$685.38	\$635.46	<b>\$49.92</b>
Parent Plus	\$975.90	\$847.98	<b>\$127.92</b>
Couple	\$1,497.18	\$1,197.60	<b>\$299.58</b>
Family	\$1,666.26	\$1,314.66	<b>\$351.60</b>
Family Cross-Reference	\$824.54	\$743.42	<b>\$81.12</b>

Standard CDHP	Total Premium	Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution
Single	\$682.80	\$656.60	<b>\$26.20</b>
Parent Plus	\$940.64	\$878.24	<b>\$62.40</b>
Couple	\$1,450.02	\$1,189.96	<b>\$260.06</b>
Family	\$1,615.30	\$1,303.24	<b>\$312.06</b>
Family Cross-Reference	\$800.94	\$771.84	<b>\$29.10</b>



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Single health insurance coverage  
for as low as \$26.20 a month!



# 2018 Monthly Premiums and Contributions

## Tobacco User Rates


All employee contributions are per employee, per month

LivingWell CDHP	Total Premium	Completing LivingWell Promise Rates		Without Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution	Employer Contribution	Employee Contribution
Single	\$709.46	\$620.04	\$89.42	\$580.04	\$129.42
Parent Plus	\$978.50	\$771.84	\$206.66	\$731.84	\$246.66
Couple	\$1,325.64	\$949.02	\$376.62	\$909.02	\$416.62
Family	\$1,479.76	\$1,051.64	\$428.12	\$1,011.64	\$468.12
Family Cross-Reference	\$818.96	\$698.64	\$120.32	\$658.64	\$160.32

LivingWell PPO	Total Premium	Completing LivingWell Promise Rates		Without Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution	Employer Contribution	Employee Contribution
Single	\$729.34	\$606.96	\$122.38	\$566.96	\$162.38
Parent Plus	\$1,037.08	\$722.26	\$314.82	\$682.26	\$354.82
Couple	\$1,589.10	\$980.74	\$608.36	\$940.74	\$648.36
Family	\$1,767.60	\$1,025.34	\$742.26	\$985.34	\$782.26
Family Cross-Reference	\$876.68	\$679.12	\$197.56	\$639.12	\$237.56

Standard PPO	Total Premium	Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution
Single	\$685.38	\$595.46	\$89.92
Parent Plus	\$975.90	\$767.98	\$207.92
Couple	\$1,497.18	\$1,117.60	\$379.58
Family	\$1,666.26	\$1,234.66	\$431.60
Family Cross-Reference	\$824.54	\$703.42	\$121.12

Standard CDHP	Total Premium	Completing LivingWell Promise Rates	
		Employer Contribution	Employee Contribution
Single	\$682.80	\$616.60	\$66.20
Parent Plus	\$940.64	\$798.24	\$142.40
Couple	\$1,450.02	\$1,109.96	\$340.06
Family	\$1,615.30	\$1,223.24	\$392.06
Family Cross-Reference	\$800.94	\$731.84	\$69.10

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