

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR AN ADJUSTMENT)	CASE NO.
OF ITS ELECTRIC AND GAS RATES)	2014-00372

**FIRST REQUEST FOR INFORMATION OF ASSOCIATION OF COMMUNITY
MINISTRIES TO LOUISVILLE GAS AND ELECTRIC COMPANY**

Association of Community Ministries (“ACM”), by counsel, requests the response of Louisville Gas and Electric Company (“LG&E”) to the following Requests for Information.

GENERAL INSTRUCTIONS

- (1) Please identify the company and witness who will be prepared to answer questions concerning each request.
- (2) If any request appears confusing, please request clarification directly from the undersigned.
- (3) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.
- (4) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reasons, please notify the undersigned as soon as possible.
- (5) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and the nature of and legal basis for the privilege asserted.
- (6) To the extent that a request calls for information not available for all categories or all periods of time for which the information is sought, please explain why the information is not available and answer the request for the time or categories for which it is available.

REQUESTS FOR INFORMATION

1. Please provide the calculations used to derive the residential monthly impact figures and percentages of the requested increase as stated by Mr. Victor A. Staffieri in his Testimony (hereafter referred to as Staffieri Testimony) at Page 8, including the calculations for the usages of 984 kWh of electricity and 5.7 Mcf of gas.

2. Please provide in Excel format the average annual usage for LG&E residential customers for each year beginning with 2010 and continuing through 2014 and provide the supporting calculations for these figures. Please provide this information for:

- a) residential electric customers
- b) residential gas customers.

3. Please provide in Excel format the average annual usage for LG&E residential customers for each year beginning with 2010 and continuing through 2014 who received assistance from a third party agency during the calendar year in question. Please provide the supporting calculations for these figures. Please provide this information for:

- a) residential electric customers
- b) residential gas customers.

4. Please provide in Excel format the average annual usage for LG&E residential customers in Jefferson County by zip code for each year starting with 2010 continuing through 2014 and provide the supporting calculations. Please provide this information for:

- a) residential electric customers
- b) residential gas customers

5. Utilizing the format in Attachment “A” to this First Request For Information, taken from Case No. 2012-00222, please provide the average residential gas bill for each month starting August 1, 2012 through December 31, 2014 generated by the average residential gas volume consumed broken down into its component parts (Customer Charge, Distribution Cost Component and Gas Supply Cost Component). Please specify the applicable rate of each component for each month. Please also provide the data in Excel format.

6. Utilizing the format in Attachment “B” to this First Request For Information, taken from Case No. 2012-00222, please provide the average residential electric bill for each month starting August 1, 2012 through December 31, 2014 by the average residential electric usage broken down into its component parts (Customer Charge and Energy Charge). Please specify the applicable rate of each component for each month. Please also provide the data in Excel format.

7. Please provide the projected average residential electric and gas bills, respectively, for each month of the forecast period that would be incurred by the average residential customer, broken down into the requested customer and energy charges and projected environmental, DSM and gas line tracker charges. Please provide the supporting calculations.

8. Please provide the average residential electric and gas bills, respectively, for each month starting July 1, 2012 through December 31, 2014 incurred by the average residential customer, broken down into the actual customer and energy charges and environmental, DSM and gas line tracker charges. Please provide the supporting calculations.

9. Please confirm that the disconnection reports attached hereto as Attachment “C” are true and accurate copies of the reports LG&E filed with the Commission and that there have been no subsequent changes to the information contained therein. If any information has been amended, please provide the amended reports.

10. Please provide in Excel format a breakdown by zip code of (1) the number of LG&E residential accounts in Jefferson County disconnected for nonpayment and (2) the number of those accounts for which service was reinstated for each of the fiscal years beginning in 2011, 2012 and 2013: Please provide this information in a manner that corresponds to the numbers reported on the disconnection reports referenced in Request No. 9 above for:

- a) residential electric customers
- b) residential gas customers

11. Please provide the number of LG&E residential customers that received assistance from a third party agency for each month from July 1, 2012 through December 31, 2014. Please state the monthly amount of such funds.

12. Please provide in Excel format a breakdown by zip code of the number of LG&E residential customers in Jefferson County who had at least one bill paid by a third party agency and the amount of assistance paid. Please provide this information for the following years:

- a) 2012
- b) 2013
- c) 2014

13. Please refer to the Testimony of Victor A. Staffieri beginning at Page 14, Line 23 and continuing through Page 15, Line 3.

- a) Describe fully the 24-month pilot project to increase the marketing of energy-efficiency programs to low income customers and improve the communication of energy-efficiency information with the customers.
- b) Identify the low income service providers referred to.

c) Describe the steps taken to develop and implement this program up to the date of your response.

d) Please identify and produce any documents developed for or utilized in this pilot project.

14. Please refer to the Testimony of Kent W. Blake (hereafter referred to as K. Blake Testimony) at Page 8, Line 1. Please state the Companies' corporate objectives.

15. Please refer to the Testimony of Edwin R. "Ed" Staton (hereafter referred to as Staton Testimony) at Page 4, Lines 12 – 17, where it is stated that "[b]ased on the Edison Electric Institute's *Typical Bills and Average Rates Report Winter 2014*...LG&E's average electric residential rate is approximately 22 percent lower than the average residential electric rate of investor-owned utilities across the United States."

a) Please provide the supporting calculation for this figure, including an explanation of how customer service charges, energy charges, demand charges and surcharges such as, e.g., DSM and environmental charges were taken into account.

b) How many of the comparison investor-owned utilities serve customers in jurisdictions that provide by law for low-income rates or other discounts and/or subsidies for residential customers based on poverty, age or disability?

c) How does average annual household income in the territories served by the comparison investor-owned utilities compare to that of LG&E's service territory?

d) Please provide a copy of the above-referenced report.

16. Please refer to page 4, Lines 22 – 24 of the Staton Testimony, where, referring to residential rates, it is stated that “[e]ven with this rate adjustment, LG&E’s projected average retail rate for 2015-2016 is approximately 16% lower than the 2013 average retail rate of investor-owned utilities in the U.S.” Please provide the supporting calculation for this figure, including an explanation of how customer service charges, energy charges, time of use pricing, demand charges and surcharges such as, e.g., DSM and environmental charges were taken into account.

17. Please refer to the Staton Testimony at Page 7, Lines 7 through 10.

- a) Describe the restrictions and qualifications for installment plans that were in place prior to the period in which said restrictions were relaxed and explain specifically how the restrictions were relaxed.
- b) Provide the dates of the beginning and end of the relaxation period.

18. Please refer to the Staton Testimony at Page 7, Lines 10 and 11. Provide the names of the recipient organizations and amounts donated by the Companies to each recipient organization.

19. Please refer to the Staton Testimony at Page 11, Lines 5 through 12.

- a) Please describe fully the enhanced outreach program including all methods and steps the Companies have taken and plan to take.
- b) Describe any meetings with community agencies and low- income advocates that have taken place.
- c) Please identify and produce any documents relevant to the development and implementation of this enhanced outreach.

20. Please refer to the Testimony of Robert Conroy (hereafter referred to as Conroy Testimony) at Page 41, Lines 12 – 24. Please provide all studies, data, analyses and other sources upon which LG&E relied, or consulted, in deciding to seek permission to raise the amount of the customer deposits, and in determining how large an increase to seek.

21. What criteria does LG&E use to determine whether a particular residential customer (or potential customer) will be required to pay a deposit? Please provide copies of any written policies, procedures, guidelines, manuals, or instructions addressing this topic.

22. Please refer to Conroy Testimony at Page 42, Line 23 to Page 43, Line 5. What, if any, other forms of non-paper written communication, in addition to electronic mail would the Companies use if the referenced Discontinuance of Service provision is approved?

23. Please describe the Companies' experience in communicating with its residential customers by email and any other methods it may use to deliver disconnection notices pursuant to the proposed Discontinuance of Service provision, including how it implemented this type of communication, and whether it has resulted in any challenges for the Companies or customers such as in ensuring receipt of communications, confidentiality or any other issues.

24. What safeguards would the Companies implement to ensure that non-paper forms of written communication would be appropriate mechanisms for delivery of disconnection notices?

25. Please provide copies of any policies, guidelines, instructions or other materials relating to communication with customers by email or other forms of non-paper written communication.

26. Please refer to the Testimony of Paul Thompson (hereafter referred to as Thompson Testimony) at Page 55, Lines 13-18. For each of the calendar years 2010 through 2014, provide a breakdown between LG&E and KU of the number of residential customers who have used My Account and number of online transactions through My Account.

27. For each of the calendar years 2010 through 2014, provide a breakdown by zip code of the number of residential customers in Jefferson County who have used the online My Account service to engage in the described transactions. For each zip code, provide the following information

- a) Number of customers who used My Account
- b) Number of transactions
- c) Breakdown of the number of transactions by type of transaction, e.g. bill payment, start/stop service, etc.

28. Please refer to the Testimony of Paul Thompson at Page 56, Lines 10 through 11.

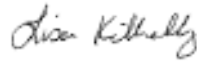
- a) Please break down the percentage of electronic payments between LG&E and KU for each year from 2007 through 2014 and provide the supporting calculations.
- b) Please provide in Excel format the percentage of electronic payments by zip code in Jefferson County for each year from 2007 through 2014 and provide the supporting calculations.

29. Please refer to the Testimony of Paul Thompson at page 57, Lines 1 - 10. Please confirm that the 40% of non-outage calls refers to residential callers.

- a) Please break down the 40% of non-outage calls per month that are fully contained within the IVR between LG&E and KU

b) Please provide in Excel format the percentage of non-outage calls that are fully contained within the IVR by zip code in Jefferson County and provide the supporting calculation.

Respectfully submitted,



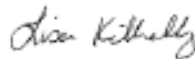
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Counsel for ACM

Dated: January 8, 2015

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing First Request for Information of Association of Community Ministries to Louisville Gas and Electric Company is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on January 8, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium is being mailed to the Commission on January 8, 2015.



Lisa Kil Kelly
Counsel for ACM

Louisville Gas and Electric Company
Case No. 2012-00222

Average Residential Natural Gas Usage -- Each Month of Test Year

	Average Residential Consumption	Customer Charge ¹	Distribution Cost Component ²	Distribution Revenue	Gas Supply Cost Component ³	Gas Supply Revenue	Total Average Residential Bill
	RGS Customers	RGS Natural Gas Consumption (ccf)					
Jan-10	291,967	45,849,470	157 \$ 9.50	\$ 0.21349	\$ 33.53	\$ 0.49129	\$ 77.15
Feb-10	291,513	42,534,670	146 \$ 9.50	\$ 0.21349	\$ 31.15	\$ 0.53494	\$ 78.05
Mar-10	294,597	34,638,550	118 \$ 9.50	\$ 0.21349	\$ 25.10	\$ 0.53494	\$ 62.90
Apr-10	293,062	13,094,764	45 \$ 9.50	\$ 0.21349	\$ 9.54	\$ 0.53494	\$ 23.90
May-10	292,189	6,393,792	22 \$ 9.50	\$ 0.21349	\$ 4.67	\$ 0.51880	\$ 11.35
Jun-10	293,321	4,647,840	16 \$ 9.50	\$ 0.21349	\$ 3.38	\$ 0.51880	\$ 8.22
Jul-10	292,764	3,809,117	13 \$ 9.50	\$ 0.21349	\$ 2.78	\$ 0.51880	\$ 6.75
Aug-10	292,867	3,373,695	12 \$ 12.50	\$ 0.22396	\$ 2.58	\$ 0.61494	\$ 7.08
Sep-10	292,553	3,566,284	12 \$ 12.50	\$ 0.22396	\$ 2.73	\$ 0.61494	\$ 7.50
Oct-10	292,060	5,602,566	19 \$ 12.50	\$ 0.22396	\$ 4.30	\$ 0.61494	\$ 11.80
Nov-10	291,729	10,831,198	37 \$ 12.50	\$ 0.22396	\$ 8.32	\$ 0.53858	\$ 20.00
Dec-10	292,140	32,672,401	112 \$ 12.50	\$ 0.22396	\$ 25.05	\$ 0.53858	\$ 60.23
Jan-11	293,490	48,643,018	166 \$ 12.50	\$ 0.22396	\$ 37.12	\$ 0.53858	\$ 89.26
Feb-11	288,190	38,829,079	135 \$ 12.50	\$ 0.22396	\$ 30.18	\$ 0.52720	\$ 71.03
Mar-11	293,714	27,570,413	94 \$ 12.50	\$ 0.22396	\$ 21.02	\$ 0.52720	\$ 49.49
Apr-11	291,768	17,620,802	60 \$ 12.50	\$ 0.22396	\$ 13.53	\$ 0.52720	\$ 31.84
May-11	291,149	8,622,989	30 \$ 12.50	\$ 0.22396	\$ 6.63	\$ 0.56143	\$ 16.63
Jun-11	291,181	5,433,166	19 \$ 12.50	\$ 0.22396	\$ 4.18	\$ 0.56143	\$ 10.48
Jul-11	290,107	3,838,254	13 \$ 12.50	\$ 0.22396	\$ 2.96	\$ 0.56143	\$ 7.43
Aug-11	291,137	3,590,636	12 \$ 12.50	\$ 0.22396	\$ 2.76	\$ 0.56050	\$ 6.91
Sep-11	290,586	3,922,996	14 \$ 12.50	\$ 0.22396	\$ 3.02	\$ 0.56050	\$ 7.57
Oct-11	290,078	5,744,628	20 \$ 12.50	\$ 0.22396	\$ 4.44	\$ 0.56050	\$ 11.10
Nov-11	286,991	12,985,006	45 \$ 12.50	\$ 0.22396	\$ 10.13	\$ 0.51602	\$ 23.35
Dec-11	291,752	23,003,651	79 \$ 12.50	\$ 0.22396	\$ 17.66	\$ 0.51602	\$ 40.89
Jan-12	293,808	34,467,636	117 \$ 12.50	\$ 0.22396	\$ 26.27	\$ 0.51602	\$ 60.54
Feb-12	291,711	32,955,030	113 \$ 12.50	\$ 0.22396	\$ 25.30	\$ 0.47423	\$ 53.37
Mar-12	292,094	22,367,112	77 \$ 12.50	\$ 0.22396	\$ 17.15	\$ 0.47423	\$ 36.31
Apr-12	292,270	8,343,507	29 \$ 12.50	\$ 0.22396	\$ 6.39	\$ 0.47423	\$ 13.54
May-12	291,877	6,749,480	23 \$ 12.50	\$ 0.22396	\$ 5.18	\$ 0.34904	\$ 8.07
Jun-12	291,354	4,387,304	15 \$ 12.50	\$ 0.22396	\$ 3.37	\$ 0.34904	\$ 5.26
Jul-12	291,585	3,643,075	12 \$ 12.50	\$ 0.22396	\$ 2.80	\$ 0.34904	\$ 4.36
Test Year Totals	3,492,362	174,551,906	50				

¹ August 2010 customer charge reflects change that went into effect with service rendered on August 1, 2010.
² August 2010 energy rate reflects the rate reduction that went into effect with service rendered on August 1, 2010.
³ The Gas Supply Cost component changed in November, February, May and August, and was billed on a service rendered basis.
 For the purpose of this calculation, the average bill reflects the GSC component that went into effect in each of these months.

Month	Customers		Electricity Consumption				Average Residential Consumption	Basic Service Charge	Energy Charge	Energy Revenue
	RSWH	Net Metering	Net		Total					
			RS	Total						
JAN 2010	346,706	1,288,738	10,824	418,849,351	420,148,913	1,212	\$ 5.00	0.06658	\$ 85.69	
FEB 2010	346,263	1,178,789	10,548	364,913,288	366,102,625	1,057	\$ 5.00	0.06714	\$ 75.97	
MAR 2010	349,948	1,200,560	10,066	330,984,268	332,194,894	949	\$ 5.00	0.06714	\$ 68.72	
APR 2010	348,148	1,069,454	6,929	260,531,907	261,608,290	751	\$ 5.00	0.06714	\$ 55.42	
MAY 2010	347,551	912,134	8,197	261,382,162	262,302,493	755	\$ 5.00	0.06714	\$ 55.69	
JUN 2010	350,050	908,808	17,691	449,753,885	450,680,384	1,287	\$ 5.00	0.06714	\$ 91.41	
JUL 2010	348,769	824,528	35,535	560,474,674	561,334,737	1,609	\$ 5.00	0.06714	\$ 113.03	
AUG 2010	349,405	770,397	36,053	549,949,955	550,756,405	1,576	\$ 8.50	0.07068	\$ 119.89	
SEP 2010	348,651	752,443	30,205	463,517,562	464,300,210	1,332	\$ 8.50	0.07068	\$ 102.65	
OCT 2010	348,027	748,857	18,678	304,138,848	304,906,383	876	\$ 8.50	0.07068	\$ 70.42	
NOV 2010	347,606	797,036	18,138	234,096,600	234,911,774	676	\$ 8.50	0.07068	\$ 56.28	
DEC 2010	347,463	1,091,841	42,311	351,173,464	352,307,616	1,014	\$ 8.50	0.07068	\$ 80.17	
JAN 2011	348,667	1,255,529	51,692	424,799,971	426,107,192	1,222	\$ 8.50	0.07068	\$ 94.87	
FEB 2011	343,686	1,081,103	48,020	333,802,360	334,931,483	975	\$ 8.50	0.07068	\$ 77.41	
MAR 2011	349,062	1,106,426	45,956	297,766,988	298,919,370	856	\$ 8.50	0.07068	\$ 69.00	
APR 2011	347,828	994,052	38,473	263,361,766	264,394,291	760	\$ 8.50	0.07068	\$ 62.22	
MAY 2011	348,384	891,333	45,571	266,277,586	267,214,490	767	\$ 8.50	0.07068	\$ 62.71	
JUN 2011	348,547	901,914	79,414	415,429,718	416,411,046	1,195	\$ 8.50	0.07068	\$ 92.96	
JUL 2011	347,561	818,013	97,093	495,026,863	495,941,969	1,427	\$ 8.50	0.07225	\$ 111.60	
AUG 2011	349,257	791,367	119,583	579,878,565	580,789,515	1,663	\$ 8.50	0.07225	\$ 128.65	
SEP 2011	348,080	793,360	88,939	439,533,998	440,416,297	1,265	\$ 8.50	0.07225	\$ 99.90	
OCT 2011	347,967	740,322	55,035	251,510,129	252,305,486	725	\$ 8.50	0.07225	\$ 60.88	
NOV 2011	343,749	787,999	60,936	234,647,071	235,496,006	685	\$ 8.50	0.07225	\$ 57.99	
DEC 2011	345,738	971,615	91,019	296,127,838	297,190,472	860	\$ 8.50	0.07225	\$ 70.64	
JAN 2012	348,417	1,144,773	122,313	362,476,212	363,743,298	1,044	\$ 8.50	0.07225	\$ 83.93	
FEB 2012	348,283	1,044,418	103,387	322,648,317	323,796,122	930	\$ 8.50	0.07225	\$ 75.69	
MAR 2012	348,712	990,998	87,345	277,121,769	278,200,112	798	\$ 8.50	0.07242	\$ 66.29	
APR 2012	348,685	895,176	65,671	248,519,056	249,479,903	715	\$ 8.50	0.07242	\$ 60.28	
MAY 2012	348,818	859,724	82,878	298,338,921	299,281,523	858	\$ 8.50	0.07242	\$ 70.64	
JUN 2012	348,893	840,338	115,755	399,213,827	400,169,920	1,147	\$ 8.50	0.07242	\$ 91.57	
JUL 2012	349,740	804,230	168,168	558,396,650	559,369,048	1,599	\$ 8.50	0.07242	\$ 124.30	

Attachment C (1 of 4)

ConDis35R

Kentucky Public Service Commission
Residential Disconnections for FY 2013

12/12/2014

Utility Type/Utility	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Nov-2012	Dec-2012	Jan-2013	Feb-2013	Mar-2013	Apr-2013	May-2013	Jun-2013	FY-2013
Investor-Owned Electric Utilities													
LOUISVILLE GAS AND ELECTRIC COMPANY				(ID- 600)	(Number of Customers 353,452)					(# of Res. Customers 346,445)			
Number of Accounts Disconnected	2,286	6,628	4,912	5,872	6,294	3,343	3,520	4,329	6,354	7,207	6,523	5,861	62,429
OUTSTANDING BILL													
HIGH	1,479.14	3,135.68	1,788.55	3,091.16	3,604.93	3,818.54	4,282.51	4,095.38	2,945.96	3,371.20	3,604.97	5,117.18	6,117.18
LOW	75.14	75.07	75.04	75.01	76.06	75.24	75.30	75.06	75.01	75.08	75.24	75.06	75.01
MEDIAN	139.50	167.02	160.02	155.52	125.22	140.27	155.49	173.33	179.62	178.25	165.25	128.74	
AVERAGE	176.51	200.82	194.19	192.83	162.80	173.21	192.62	211.70	210.97	216.51	210.07	173.70	193.16
Number Reinstated	2,072	5,655	4,334	5,254	4,969	3,084	3,176	3,616	5,688	6,237	5,828	5,238	55,151

Attachment C (2 of 4)

ConDis-35R

Kentucky Public Service Commission
Residential Disconnections for FY 2013

12/12/2014

Utility Type/Utility	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Nov-2012	Dec-2012	Jan-2013	Feb-2013	Mar-2013	Apr-2013	May-2013	Jun-2013	FY-2013
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Gas Distribution Companies

LOUISVILLE GAS AND ELECTRIC COMPANY	(ID- 2220500)	(Number of Customers	(# of Res. Customers	(# of Res. Customers										
Number of Accounts Disconnected	21	134	61	68	91	154	176	219	219	380	458	403	265	2,411
OUTSTANDING BILL														
HIGH	305.85	1,225.22	174.29	199.30	313.96	330.44	1,990.88	692.69	1,822.17	500.84	853.86	965.67	1,990.88	
LOW	76.96	75.66	76.14	76.27	76.05	76.93	76.89	75.70	75.34	75.21	75.59	76.79	75.21	
MEDIAN	87.47	101.84	87.59	91.01	101.46	112.74	108.65	133.08	123.37	118.44	122.73	118.17		
AVERAGE	118.31	136.17	98.49	101.87	111.33	122.00	158.48	155.95	152.32	135.96	147.15	152.48	130.96	
Number Reinstated	21	72	70	195	159	134	170	153	293	284	183	102	1,828	

Attachment C (4 of 4)
 ConDis35R

Kentucky Public Service Commission
 Residential Disconnections for FY 2014

12/12/2014

Utility Type/Utility Jul-2013 Aug-2013 Sep-2013 Oct-2013 Nov-2013 Dec-2013 Jan-2014 Feb-2014 Mar-2014 Apr-2014 May-2014 Jun-2014 FY-2014

Gas Distribution Companies

	Jul-2013	Aug-2013	Sep-2013	Oct-2013	Nov-2013	Dec-2013	Jan-2014	Feb-2014	Mar-2014	Apr-2014	May-2014	Jun-2014	FY-2014
LOUISVILLE GAS AND ELECTRIC COMPANY													
Number of Accounts Disconnected	157	157	102	98	94	68	172	189	436	448	384	234	2,539
OUTSTANDING BILL													
HIGH	644.72	668.21	243.12	1,091.84	388.40	471.37	427.77	608.06	617.35	949.36	668.43	1,541.76	1,541.76
LOW	75.87	75.69	75.34	75.96	76.43	80.15	75.14	75.26	76.67	75.08	79.89	76.09	75.08
MEDIAN	106.10	102.58	83.53	96.61	95.12	104.75	122.08	125.73	147.99	143.73	155.07	121.31	
AVERAGE	122.81	131.82	102.50	137.61	111.03	120.64	137.77	148.72	177.12	162.88	186.83	176.35	144.94
Number Reinstated	92	91	73	268	169	87	151	155	306	242	164	93	1,903