

2013 Cost of Service Study (COSS)

Strategic Customer Meeting
Powder River Energy Corporation
March 27, 2013

2013 Cost of Service Study

- Completed by our rate consultants at Guernsey.
 - David Hedrick and Rebecca Payne
- Based on the test year 2012, with known and measurable changes incorporated.
- Final December financial results were available February 8th.
- Detailed data request completed and submitted.

DATA REQUEST

POWDER RIVER ENERGY CORPORATION Sundance, Wyoming

GUERNSEY's cost of service data request is intended to serve as a checklist for data needed to prepare a study which accurately reflects your Cooperative's cost of providing service. While each data request item is important, some items may not be applicable to your Cooperative. When responding to the data request, a "Not Applicable" or "No" response is helpful since it provides important information about your Cooperative. A "still working on it" response lets us know that data is pending. We encourage you to contact us about any item you have questions about or find burdensome to prepare – there may be other more readily available reports with the information needed for the study.

Data Format

We'll work with your information in whatever form you provide the data. However, some items are requested in a specific format because this will help reduce the cost of your project. Where electronic files are provided, please format them to print on letter size paper (8.5 x 11). Unless specifically indicated, we don't need the underlying individual journal entries. Usually the account totals, whether monthly or test year total are sufficient.

Naming Electronic Files

It is helpful if the names of electronic files incorporate the data request item number. For example:

- 1.1_Rate Schedules.doc
- 1.2_2011 December Form7.pdf
- 1.3_2011 Summary Trial Balance.xls

Sending Data Request Responses

For the initial data request response, it is usually more efficient if electronic files are provided on CD, USB drive, or via GUERNSEY's Project Management Portal, as opposed to numerous e-mail attachments. If you are interested in exchanging files via the GUERNSEY Portal, please let us know and we will setup an FTP site for you.

- (1) Your **test year** is the twelve months ending **December 31, 2012**.
- (2) An electronic file response is designated for some data request items. Excel is preferred for spreadsheets. Word and WordPerfect are preferred for narrative descriptions. Text or pdf files are also acceptable. If it is more convenient, hard copy files, CDs, etc. may be mailed to the address below.

1.2 Provide copies of the following RUS/CFC Form 7 reports (ignore if you subscribe to GUERNSEY's *Financial Performance Analysis* service):

- a. December Form 7s (ALL PAGES) for the test year and previous ten (10) years.
- b. Monthly Form 7s for the 12 months of the test year and the 24 months prior to the test year (a total of 36 months). Part R (or Part O) is not required for January-November if the December report shows each of these months.

Note: If Part R (or Part O) Power Requirements Database of the December report does not show all 12 months, provide a report/spreadsheet showing the Part R (or Part O) information for each month (January through December) and the totals for the year.

1.3 Provide a copy of the Year-to-Date Trial Balance for test year end or the Summary General Ledger(s) for the same period or monthly Summary Trial Balances for the thirteen months ending with the test year end. The report(s) provided should show the beginning of year balances and the end of year balances by detailed account for ALL accounts (including but not limited to) the plant accounts (the A300" account series), the Other Revenue accounts (A450" account series), the operating expenses (the A500" and 900 account series), depreciation (the A403" account series), taxes (the A408" account series), and accumulated depreciation (the A108" account series).

Note: The Summary General Ledger report is typically 20 pages or less. If available, provide electronically in spreadsheet format.

1.5 Provide Asset Reports or Continuing Property Records (CPR) reports as of test year end for each distribution plant account (360 through 373) showing:

- a. The quantity or number of units by various sizes and the total investment for that unit type.
- b. The sum of the investment for unit types for each account should correspond to the general ledger/trial balance test year ending balance of that account.

Note: Depending on the plant account, units are poles, conductor, conduit, line transformers (by kVA size), regulators, capacitors, meters, etc.

If available, provide electronically in spreadsheet format.

1.6 Provide a copy of the most recent annual audit report. If the current audit has not been completed, provide a copy of the audit report as soon as it is available.

1.7 Provide a copy of the most recent financial forecast.

1.8 Provide a copy of the operating budget for the current calendar year.

1.9 If the plant additions in the financial forecast should be updated, provide the projected plant additions and retirements for the next five (5) years with the yearly additions separated by transmission, distribution, and general plant. Note: A copy of Form 740C from the most recent Construction Work Plan or a copy of the summary pages from the work plan may contain much of this information.

2. USAGE STATISTICS AND COST OF SERVICE DATA

2.1 Provide the following monthly sales information:

- a. Copies of the monthly sales/billing reports by rate schedule code for each month of the test year. The reports should show:
 - (1) Number of customers served,
 - (2) kWh sold,
 - (3) Base rate revenue, and
 - (4) Power Cost Adjustment (PCRF, ECA, PCA, etc.), Fuel Cost Adjustment (FCA), Debt Cost Adjustment (DCA, DSA), etc. revenue.
- b. Unbilled revenue (net monthly amount if booked).
- c. PCRF Over/Under recovery revenue (net monthly amount if booked).
- d. For Miscellaneous Charges such as meter reading fees, return check fees, connect fees, trip fees, etc., provide the present fee for each charge and the number of times (by month or total) each fee was charged during the test year. Note: If the fee for overtime is different from regular work-hour fees, provide separately the number of times for overtime fees and regular fees.

Note: For Item a, provide the reports as produced by your billing software.

2.2 Wholesale Power Bills.

- a. Provide copies of the test year monthly power bills from each wholesale supplier (including distributed generation and co-generator, if applicable).
- b. If the wholesale supplier made any adjustments for metering corrections, refunds, etc., provide copies of each adjustment and an explanation of the adjustment. For metering corrections, show the corrected metered kW, billing kW, kWh, or other billing units, and indicate the metering point for which the correction was made.
- c. If any portion of the wholesale power billing is charged to an expense account other than Account 555, provide a monthly summary showing the account, amount, and an explanation of how the amount was determined.
- d. If the wholesale power supplier applies any adjustments or special charges to the power bill such as special facilities charges, investment credit, meter reading or processing charges, etc., provide complete details.
- e. Provide a copy of the applicable wholesale rate schedule (tariff sheet) for each wholesale power supplier and co-generator.
- f. If the wholesale rate changed after the test year or if the wholesale power supplier is proposing a rate change, provide a copy of the changed and/or proposed rate.

- 2.5 For each consumer billed or to be billed on a demand (kW or kVA) or horsepower (HP) rate, provide the following for each month of the test year:
- a. Account number, name, rate code, revenue code and state;
 - b. Installed kVA (if available);
 - c. Metered demand (kW or kVA) or installed HP;
 - d. Billing demand (kW or kVA) or billing HP;
 - e. If applicable, metered and billing on-peak or coincident peak (CP) kW
 - f. kWh (exclude unmetered security lights);
 - g. Base rate revenue (customer charge billing, demand charge billing, energy charge billing, etc.) excluding sales and franchise taxes; and
 - h. FCA/PCA/PCRF/DCA, etc. revenue, if applicable (excluding sales and franchise taxes).
 - i. If kW or HP data is available for any other consumers, provide the above data for those customers.

2.11 Provide by overhead and underground categories the miles of distribution single-phase, three-phase, and V-phase line at the end of the test year. The totals should agree with the RUS Form 7, Part B, Items 6 and 7.

2.12 For any significant facilities (i.e., transmission lines, substations, distribution feeders, etc.) serving only one customer or one class of customers, provide the following:

- a. The direct investment by plant account (with and without contributions in aid of construction) for the class or customer.
- b. If the direct assignment is transmission or distribution line or transformers, indicate the applicable miles of line and the number of transformers by size for the direct assignment.

Example: Special contract customer with \$0 contribution in aid of construction - \$300,000 in Account 362, \$75,000 in Accounts 364 and 365, and \$45,000 in Account 368 with 1.5 miles of distribution line and three 1000 kVA transformers.

2.13 Provide a tabulation showing the representative present-day cost of the following:

- a. Cost per mile for constructing typical three-phase extensions (both overhead (OH) and underground (UG)).
- b. Cost per mile for constructing typical single-phase line (both OH and UG).
- c. Cost per mile for constructing main feeder three-phase line (OH and UG).
- d. Provide a brief description of your underground plant. For example, is it primarily used around airports, in subdivisions serving residential customers, *etc.*
- e. Installed cost per meter (Account 370) for typical consumers such as single-phase, three-phase, three-phase with demand meters, primary service with demand meters, and any other special metered consumers.
- f. Cost per services (Account 369) for typical consumers such as single-phase and three-phase residential, single-phase and three-phase small commercial, single-phase and three-phase irrigation, large power, and any other customer groups. Note: This cost excludes transformers and meters.

3. DATA FOR REVENUES AND EXPENSES

3.1 Provide the following information for each note payable to RUS and/or CFC and any other long-term notes or obligations as of the end of the test year:

- a. Note number
- b. Note origination date and term (years) of the note
- c. Lender (RUS CFC Other)
- d. Original amount of note
- e. Unadvanced loan funds
- f. Interest rate
- g. Note balance at end of test year
- h. Advance payments
- i. If any CFC notes repriced during the test year or will reprice within one year, identify the notes and indicate the reprice interest rate and date.

Note: The sum of the outstanding balances of all notes should reconcile to the total long-term debt plus current maturities on long-term debt reported on the Form 7 for the last month of the test year.

3.2 Provide copies of the monthly and quarterly invoices (detailed invoices showing principal outstanding, principal payments, interest payments, discounts, etc.) for the test year and invoices subsequent to the test year from:

- a. RUS
- b. CFC
- c. Other lenders and obligations such as CoBank, NCSC, FFB, NRECA, long-term leases, etc.

3.3 For each variable interest rate note, provide a copy of the Loan Amortization Schedule top sheet (which shows the loan number, loan date, final payment date, billing cycle, number of payments, amortization interest rate, principal amount amortized, and level debt service amount) or provide the monthly/quarterly principal payments for the next five years.

3.4 If the Cooperative has drawn additional loan funds from RUS, CFC, or others since the end of the test year, provide a list showing the date of each draw, the amount drawn, and the interest rate. Provide the same information for any draws the Cooperative anticipates within the twelve months following the end of the test year.

3.9 Provide the following for depreciation:

- a. The depreciation rates for transmission and distribution plant (example: 2.75% for transmission plant and 3.00% for distribution plant). If composite depreciation rates are not used, provide the applicable depreciation rates by plant account.
- b. If not provided with the General Ledger/Trial Balances, provide the test year monthly depreciation expense by account number (403.5, 403.6, 403.7, etc.).
- c. Provide the monthly depreciation expense by account number for the three months following the end of the test year.

3.10 Provide the following for bad debt expense:

- a. The bad debt expense for the test year and the three prior calendar years.
- b. The amount of bad debts actually written-off for the test year and three prior years.
- c. The amount of bad debts actually collected after write-off for the test year and three prior years.

3.11 Provide the following for Property Tax:

- a. Test year property tax by detailed account by account number (i.e., Accounts 107, 108, 163, 184, 242, 456, 560 through 932, etc.).
- b. The total property tax paid for the most recent calendar year.
- c. If the taxing authority assesses property tax on only certain plant accounts or types, provide a summary of the test year property tax by plant account or type.

Note: If available, provide electronically in spreadsheet format.

Analysis and Deliverable

- All data requested has been submitted to Guernsey for analysis.
- First draft of the COSS is anticipated by mid-April.
- Guernsey produces an income statement based on the test year with adjustments for known and measurable changes.

	Test Year 12/31/09	Adjustments	Adjusted Test Year	Rate Change	Adjusted w/ Rate Change
	(a)	(b)	(c)	(d)	(e)
Operating Revenues					
Base Revenue	\$ 135,813,133	\$ (755,170)	\$ 135,057,963	\$ 33,847,915	\$ 168,905,878
COPA	25,502,632	8,346,091	33,848,723	(33,848,723)	0
Basin Credit	(7,565,139)	7,565,133	0	0	0
Deferred Revenue	(2,300,000)	3,050,000	750,000	0	750,000
Other	1,649,433	0	1,649,433	0	1,649,433
Total	\$ 153,100,065	\$ 18,206,054	\$ 171,306,119	\$ (808)	\$ 171,305,311
Operating Expenses					
Purchased Power	\$ 118,209,635	\$ 8,580,159	\$ 126,789,794	\$	\$ 126,789,794
PP Bill Credit	(8,446,198)	8,446,198	0		0
Transmission O&M	1,138,743	(132,330)	1,006,413		1,006,413
Distribution-Ops	8,234,888	247,242	8,482,130		8,482,130
Distribution-Maint.	3,249,322	328,334	3,577,656		3,577,656
Cons Acctg	3,558,330	(575,780)	2,982,550		2,982,550
Cust Service	124,057	2,931	126,987		126,987
Sales	0	0	0		0
Admin & General	5,389,393	357,641	5,747,035		5,747,035
Depreciation	13,483,308	491,894	13,975,202		13,975,202
Tax	414,129	875,000	1,289,129		1,289,129
Total	\$ 145,355,605	\$ 18,621,290	\$ 163,976,896	\$ 0	\$ 163,976,896
Return	\$ 7,744,459	\$ (415,236)	\$ 7,329,223	\$ (808)	\$ 7,328,415
Interest & Other Deductions					
Interest on L-T Debt	\$ 5,366,894	\$ 1,568,199	\$ 6,935,093	\$	\$ 6,935,093
Interest-Other	147,341	(102,011)	45,330		45,330
Other Deductions	96,139		96,139		96,139
Total	\$ 5,610,374	\$ 1,466,188	\$ 7,076,562	\$ 0	\$ 7,076,562
Operating Margin	\$ 2,134,085	\$ (1,881,424)	\$ 252,661	\$ (808)	\$ 251,853
Non-Operating Margins					
Interest Income	\$ 569,390	\$	\$ 569,390	\$	\$ 569,390
Other Margins	109,309		109,309		109,309
G&T Capital Credits	12,920,928		12,920,928		12,920,928
Other Capital Credits	246,118		246,118		246,118
Extraordinary Items	0		0		0
Total	\$ 13,845,745	\$ 0	\$ 13,845,745	\$ 0	\$ 13,845,745
Net Margins	\$ 15,979,830	\$ (1,881,424)	\$ 14,098,406	\$ (808)	\$ 14,097,598
Operating TIER	1.40		1.04		1.04
Net TIER	3.98		3.03		3.03
Net TIER w/o Cap Cr	1.57		1.17		1.17
RUS OTIER	2.03		1.53		1.52
DSC	3.39		2.96		2.96
RUS ODSC	2.37		2.07		2.07
Rate of Return	3.73%		3.53%		3.53%
Rate Base	\$ 207,789,714	\$ 28,505	\$ 207,818,219	\$ 0	\$ 207,818,219
Principal Payments	4,901,214		4,901,214		4,901,214
Percent Increase					0.00%

Analysis and Deliverable

- Guernsey produces a cost allocation summary which shows how the individual rate classes are contributing to the income statement result.
- Individual rates of return and potential cross class subsidization are apparent here.

**POWDER RIVER ENERGY CORPORATION
EXISTING RATES
TEST YEAR ENDING DECEMBER 31, 2009
Cost Allocation Summary**

<u>Account</u>	<u>Total</u>	<u>RESIDENTIAL</u>	<u>Gen Service</u>	<u>LARGE PWR</u>	<u>Irrigation</u>	<u>LIGHTS</u>
Rate Base	207,818,215	39,559,074	20,092,586	27,255,612	601,139	324,645
Operating Revenues	171,306,118	16,793,259	9,599,952	22,085,634	209,126	252,145
Operating Expenses	163,976,898	15,428,977	8,734,003	20,919,081	220,598	236,890
Return	7,329,220	1,364,281	865,949	1,166,552	-11,472	15,254
Rate of Return	3.527 %	3.449 %	4.310 %	4.280 %	-1.908 %	4.699 %
Relative ROR	1.000	0.978	1.222	1.213	-0.541	1.332
Interest	7,076,562	1,236,316	627,657	859,329	18,676	10,490
Operating Margins	252,658	127,964	238,291	307,223	-30,148	4,764
Margin as % Revenue	0.147 %	0.762 %	2.482 %	1.391 %	-14.416 %	1.889 %
Operating TIER	1.036	1.104	1.380	1.358	-0.614	1.454
<u>Revenue Deficiencies</u>						
Uniform ROR = 3.526746	2	30,866	-157,334	-205,316	32,672	-3,805
Deficiency % Rev	0.000 %	0.184 %	-1.639 %	-0.930 %	15.623 %	-1.509 %
Uniform % Mar = 0.147490	2	-103,348	-224,464	-275,054	30,501	-4,398
Deficiency % Rev	0.000 %	-0.615 %	-2.338 %	-1.245 %	14.585 %	-1.744 %

POWDER RIVER ENERGY CORPORATION
EXISTING RATES
TEST YEAR ENDING DECEMBER 31, 2009
Cost Allocation Summary

<u>Account</u>	<u>Total</u>	<u>GS CBM</u>	<u>LP CBM</u>	<u>LPT - CBM</u>	<u>LPC - CBM</u>	<u>All CBM</u>	<u>LPT</u>
Rate Base	207,818,215	14,951,049	81,745,385	2,291,169	145,893	99,133,497	20,851,659
Operating Revenues	171,306,118	9,047,092	51,086,857	8,171,482	833,507	69,138,940	53,227,058
Operating Expenses	163,976,898	9,013,180	48,940,265	7,989,033	810,279	66,752,759	51,684,586
Return	7,329,220	33,911	2,146,592	182,449	23,227	2,386,181	1,542,472
Rate of Return	3.527 %	0.227 %	2.626 %	7.963 %	15.921 %	2.407 %	7.397 %
Relative ROR	1.000	0.064	0.745	2.258	4.514	0.682	2.098
Interest	7,076,562	565,341	2,918,449	83,454	5,218	3,572,464	751,626
Operating Margins	252,658	-531,430	-771,857	98,995	18,009	-1,186,283	790,845
Margin as % Revenue	0.147 %	-5.874 %	-1.511 %	1.211 %	2.161 %	-1.716 %	1.486 %
Operating TIER	1.036	0.060	0.736	2.186	4.451	0.668	2.052
Revenue Deficiencies							
Uniform ROR = 3.526746	2	493,374	736,360	-101,645	-18,082	1,110,006	-807,087
Deficiency % Rev	0.000 %	5.453 %	1.441 %	-1.244 %	-2.169 %	1.605 %	-1.516 %
Uniform % Mar = 0.147490	2	545,578	848,457	-87,071	-16,804	1,290,159	-713,393
Deficiency % Rev	0.000 %	6.030 %	1.661 %	-1.066 %	-2.016 %	1.866 %	-1.340 %

COSS and Rate Case

- First draft of COSS anticipated by mid-April.
- PRECorp staff will review and discuss findings and recommendations with Guernsey and incorporate any necessary changes.
- Completed study by June 30.
- Board decision and application filed by July 31.

	2011 Actual	2012 Budget	2012 Projected	2013 Budget
1. Operating Revenue and Patronage Capital	\$ 179,159,059	\$ 197,596,794	\$ 187,242,401	\$ 183,015,545
2. Power Production Expense	-	-	-	-
3. Cost of Purchased Power	\$ 137,942,103	\$ 152,284,129	\$ 143,963,997	\$ 142,168,018
4. Transmission Expense	1,130,111	1,405,453	1,087,759	1,262,631
5. Regional Market Expense	-	-	-	-
6. Distribution Expense - Operation	8,630,320	8,968,488	8,831,460	8,709,272
7. Distribution Expense - Maintenance	3,060,437	3,078,139	2,947,129	3,250,100
8. Consumer Accounts Expense	2,637,471	2,960,595	2,530,337	2,829,210
9. Customer Service and Informational Expense	186,951	183,272	92,692	135,153
10. Sales Expense	-	-	-	-
11. Administrative and General Expense	5,651,546	5,918,874	5,510,090	6,092,906
12. Total Operation & Maint. Expense (2 thru 11)	\$ 159,238,939	\$ 174,798,950	\$ 164,963,464	\$ 164,447,290
13. Depreciation and Amortization Expense	12,322,028	14,654,936	13,521,661	11,467,054
14. Tax Expense - Property & Gross Receipts	399,945	473,629	451,731	389,076
15. Tax Expense - Other	57,596	57,092	56,038	54,301
16. Interest on Long Term Debt	6,199,932	6,436,616	6,373,784	6,006,649
17. Interest Charged to Construction - Credit	-	-	-	-
18. Interest Expense - Other	135,100	135,333	92,892	66,147
19. Other Deductions	188,490	226,115	181,354	176,339
20. Total Cost of Electric Service (12 thru 19)	\$ 178,542,030	\$ 196,782,671	\$ 185,640,925	\$ 182,606,856
21. Patronage Capital & Operating Margins (1-20)	\$ 617,029	\$ 814,123	\$ 1,601,476	\$ 408,689
22. Nonoperating Margins - Interest	1,854,426	2,087,393	2,217,869	1,715,000
23. Allowance for Funds Used During Construction	-	-	-	-
24. Income (Loss) from Equity Investments	-	-	-	-
25. Nonoperating Margins - Other	1,071,766	49,157	19,324	530
26. Generation and Transmission Capital Credits	6,520,907	8,084,650	8,084,650	9,035,752
27. Other Capital Credits and Patronage Dividends	115,479	112,800	112,800	109,200
28. Extraordinary Items	-	-	-	-
29. Patronage Capital or Margins (21 thru 28)	\$ 10,179,607	\$ 11,148,123	\$ 12,036,119	\$ 11,269,171
TIER	2.64	2.73	2.89	2.88

Summary of kWh Sales - Actual & Projections

Actual 2010-2011, Budget & Projected 2012, Budget 2013

	2010 Actual	% Increase over 2009	2011 Actual	% Increase over 2010	2012 Budget	% Increase over 2011	2012 Projected	% Increase over 2011	2013 Budget	% Increase over 2012
Residential	214,756,667	-0.62%	219,863,151	2.38%	223,139,000	1.49%	203,295,483	-7.54%	212,842,000	4.70%
Seasonal	8,007,510	1.84%	8,164,382	1.96%	8,265,000	1.24%	8,196,046	0.39%	8,200,000	0.05%
Irrigation	2,408,066	-20.11%	2,392,918	-0.63%	2,250,000	-5.97%	4,042,163	68.92%	2,500,000	-38.15%
Gen. Service	139,440,502	-2.04%	140,894,088	1.04%	141,946,000	0.75%	141,175,529	0.20%	143,143,000	1.39%
GS - CBM	103,569,859	-12.88%	96,165,252	-7.15%	85,727,000	-10.85%	79,982,029	-16.83%	66,263,000	-17.15%
Large Power	405,286,301	4.98%	416,886,501	2.86%	428,501,000	2.79%	439,703,282	5.47%	466,613,000	6.12%
LP - CBM	715,878,417	-0.56%	684,457,238	-4.39%	650,167,000	-5.01%	581,752,521	-15.01%	431,747,000	-25.79%
LPT - Coal	1,256,162,830	2.22%	1,259,309,261	0.25%	1,254,016,000	-0.42%	1,228,224,248	-2.47%	1,121,946,000	-8.65%
LPT - Other	1,004,500	-57.04%	-	-100.00%	-	-100.00%	-	0.00%	-	0.00%
LPT - CBM	178,061,212	-7.63%	136,993,233	-23.06%	108,628,000	-20.71%	103,508,993	-24.44%	80,874,000	-21.87%
LPC-CBM	19,177,025	560.97%	27,634,660	44.10%	27,600,000	-0.13%	33,754,116	22.14%	33,754,000	0.00%
Street Lts.	912,123	2.52%	915,450	0.36%	923,000	0.87%	905,837	-1.05%	911,000	0.57%
Total	3,044,665,012	0.75%	2,993,676,134	-1.67%	2,931,162,000	-2.09%	2,824,540,247	-5.65%	2,568,793,000	-9.05%

Summary of annual sales (kWh)

	2010 Actual	% Increase over 2009	2011 Actual	% Increase over 2010	2012 Budget	% Increase over 2011	2012 Projected	% Increase over 2011	2013 Budget	% Increase over 2012
Res/Seasonal	222,764,177	-0.53%	228,027,533	2.36%	231,404,000	1.48%	211,491,529	-7.25%	221,042,000	4.52%
Coal	1,256,162,830	2.22%	1,259,309,261	0.25%	1,254,016,000	-0.42%	1,228,224,248	-2.47%	1,121,946,000	-8.65%
CBM	1,016,686,513	-1.72%	945,250,383	-7.03%	872,122,000	-7.74%	798,997,659	-15.47%	612,638,000	-23.32%
Other Comm.	545,731,303	2.83%	557,780,589	2.21%	570,447,000	2.25%	580,878,811	4.14%	609,756,000	4.97%
Irrigation	2,408,066	-20.11%	2,392,918	-0.63%	2,250,000	-5.97%	4,042,163	68.92%	2,500,000	-38.15%
Other	912,123	2.52%	915,450	0.36%	923,000	0.87%	905,837	-1.05%	911,000	0.57%
Total Sales	3,044,665,012	0.75%	2,993,676,134	-1.67%	2,931,162,000	-2.09%	2,824,540,247	-5.65%	2,568,793,000	-9.05%

Discussion