

LUKINS BROTHERS WATER COMPANY

2031 West Way, So. Lake Tahoe, CA 96150

Telephone (530)541-2606

February 4, 2020

Advice Letter No. 82-W

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Lukins Brothers Water Company (LUKINS) hereby transmits for filing one original and one copy of this advice letter and the following tariff sheets which are enclosed:

<u>NEW SHEET #</u>	<u>TITLE</u>	<u>CANCELLING SHEET #</u>
528-W	Preliminary Statement	91-W
529-W	Schedule No.1, General Metered Service	501-W
530-W	Schedule No. 2A, Annual Flat Rate Service	502-W
531-W	Table of Contents	527-W

REQUEST

By Advice Letter (AL) No. 82-W, LUKINS requests Commission authorization to establish a Water Contamination Litigation Expense Balancing Account (WCLEBA), and a monthly surcharge to amortize the balances previously recorded in its Water Contamination Litigation Expense Memorandum Account (WCLEMA), as authorized in Commission Decision 10-10-018, section 792.5 of the Public Utilities Code and GO 96-B. As of December 31, 2019. The WCLEMA has a total balance of \$102,604.07. This amount is equal to 12.83% of gross annual revenues adopted for the most recent general rate case, test year 2015, Resolution W-5026, March 26, 2015 and 12.58% from LUKINS' present rates. The present rates became effective on February 19, 2019, by Advice Letter 78-W, which authorized a Consumer Price Index (CPI) rate increase of \$15,686, or 1.90%.

LUKINS requests a monthly surcharge of \$2.91 for metered customers and flat rate customers for three years or until \$102,604.07 has been collected.

BACKGROUND

In 2014, LUKINS discovered PCE above the regulatory limit in its Wells 2&5, which were two of the three remaining active wells operating at the time. To protect customers, LUKINS immediately shut the wells down. Since that time, LUKINS has operated its system through its remaining well and emergency intertie with neighboring water system, South Tahoe Public Utility District.

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The California Regional Water Quality Control Board- Lahontan Region (Regional Board) is engaged in ongoing enforcement actions with potential responsible parties. As of the date of this filing, the Regional Board has not issued any replacement water orders to responsible parties.

LUKINS has retained the services of Robins Borghei LLP, to represent Lukins in relation to the PCE groundwater contamination that has been impacting LUKINS' water supply. On July 3, 2017, LUKINS filed a lawsuit against those parties that LUKINS believes are legally responsible for causing the contamination. A copy of LUKINS' legal complaint is enclosed.

Robins Borghei LLP, a law firm located in San Francisco, specializes in representing water utilities in groundwater contamination litigation. The firm has represented dozens of public water suppliers throughout California. Robins Borghei LLP is a preferred provider through the California Rural Water Association, of which Lukins is a member. Lukins is confident that it has selected the best possible legal team to represent its case.

Per Resolution W-4094 effective March 28, 1998, Lukins was granted the authority to establish the Water Contamination Litigation Expense Memorandum Account. Since litigation began for the PCE contamination during July 2017, Lukins has been recording legal expenses associated with this litigation into the Memorandum Account. Lukins is requesting authority to establish a Water Contamination Litigation Expense Balancing Account (WCLEBA) and transfer the Water Contamination Litigation Expense Memorandum Account balance of \$102,604.07 (as of 12/31/2019) to the WCLEBA. Lukins requests authority to amortize the balance over a three years period, with a surcharge of \$2.91 every month. Attached are work papers supporting the balancing accounts accruals.

The proposed surcharge in this AL will only recover the amounts already recorded through December 31, 2019 in Lukins' WCLEBA will not provide any additional net revenue for LUKINS and will not result in any increase in its authorized rate of return.

By pursuing litigation against the parties responsible for the PCE contamination, Lukins seeks to recover damages and expenses incurred as a result, and to seek remediation of said contamination ensuring the safety of its water and its customers.

Per Commission Decision D.10-10-018, issued on October 18, 2010, Ordering Paragraph 5 and 6 state,

"5. If an investor-owned water utility receives proceeds from any of the funding sources identified in Ordering Paragraph 1 after the contaminated plant is replaced or remediated and all costs have been determined, the remaining amount of proceeds ("net proceeds" as defined in Ordering Paragraph 6) may be shared between ratepayers and shareholders upon Commission approval where circumstances warrant and on the basis of factors relevant to the individual case, including factors set out in Appendix D to this

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decision.

6. "Net Proceeds" are hereby defined as:

Gross proceeds received minus all (1) reasonable legal expenses related to litigation, (2) costs of remedying plants, facilities, and resources to bring the water supply to a safe and reliable condition in accordance with General Order 103-A standards, and (3) all other reasonable costs and expenses that are the direct result and would not have to be incurred in the absence of such contamination, including all relevant costs already recovered from ratepayers (for which they have been, or will be, repaid or credited)."

If any award results from contamination litigation, any net proceeds will be handled as per Commission Decision 10-10-008.

LUKINS respectfully requests expedited handling of this advice letter.

TIER DESIGNATION AND REQUESTED EFFECTIVE DATE

This AL and enclosed tariffs are submitted pursuant to Water Industry Rule 7.3.3(5) of General Order (GO.) 96-B and this AL is designated as a Tier 3 filing.¹ This advice letter will become effective upon approval through a Commission Resolution.

NOTICE

In compliance with Section 4.3 of GO. 96-B, a copy of this AL has been served to all parties listed on the enclosed service list.²

This filing will not cause withdrawal of service nor conflict with any other schedule or rule.

RESPONSE OR PROTEST³

Anyone may respond to or protest this advice letter. A response supports the filing and may contain information that proves useful to the Commission in evaluating the advice letter. A protest objects to the advice letter in whole or in part and must set forth the specific grounds on which it is based. These grounds are:

1. The utility did not properly serve or give notice of the advice letter;
2. The relief requested in the advice letter would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the advice letter contain material error or omissions;
4. The relief requested in the advice letter is pending before the Commission in a formal proceeding; or

¹ GO. 96-B, Water Industry Rule 7.3.3

² GO. 96-B, Water Industry Rule 4.2

³ GO. 96-B, General Rule 7.4.1

LUKINS BROTHERS WATER COMPANY

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5. The relief requested in the advice letter requires consideration in a formal hearing, or is otherwise inappropriate for the advice letter process; or
6. The relief requested in the advice letter is unjust, unreasonable, or discriminatory (provided that such a protest may not be made where it would require relitigating a Prior order of the Commission).

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A protest shall provide citations or proofs where available to allow staff to properly consider the protest. A response or protest must be made in writing or by electronic mail and must be received by DWA within 20 days of the date this advice letter is filed. The addresses for submitting a response or protest are:

Mailing Address:

California Public Utilities
Commission
Water Division, 3rd Floor
505 Van Ness Avenue San
Francisco, CA 94102

Email Address:

Water.Division@cpuc.ca.gov

On the same day the response or protest is submitted to DWA, the respondent or protestant shall send a copy of the protest to Lukins at:

Mailing Address:

Lukins Brothers Water Co.
2031 West Way
South Lake Tahoe, CA 96150

Email Address:

jennifer@lukinswater.com

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, within the 20-day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

REPLIES

The utility shall reply to each protest and may reply to any response. Each reply must be received by DWA within five business days after the end of the protest period and shall be served on the same day to the person who filed the protest or response.⁴

⁴ GO. 96-B, General Rule 7.4.3

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CERTIFICATE OF SERVICE

I hereby certify that the service list from Advice Letter 82-W had been served a copy of this AL on February 4, 2020.

Executed in South Lake Tahoe, California on February 4, 2020.

LUKINS BROTHERS Water
Company

By: /S/ JENNIFER L LUKINS
Jennifer Lukins
Manager

Enclosures

LUKINS BROTHERS WATER COMPANY, INC.

SERVICE LIST

(Per Section 4.3 of GENERAL ORDER NO. 96-B)

Advice Letter #82-W

Via First Class US Mail

Service List:

City of South Lake Tahoe
Administrative Center
1901 Airport Blvd.
So. Lake Tahoe, CA 96150

El Dorado County
Development Services Dept.
3368 Lake Tahoe Blvd., Suite 302
So. Lake Tahoe, CA 96150

South Tahoe PUD
1275 Meadow Crest Dr.
South Lake Tahoe, CA 96150

Tahoe Keys POA
356 Ala Wai Blvd.
South Lake Tahoe, CA 96150

Fern Erskine
786 Patricia Lane
South Lake Tahoe, CA 96150

Mike Mosca
Po Box 9136
South Lake Tahoe, CA 96158

Alan Miller
Po Box 7526
South Lake Tahoe, CA 96158

Teri Jamin
1052 Tata Lane
South Lake Tahoe, CA 96150

Maureen Froyum
920 Patricia Lane
South Lake Tahoe, CA 96150

Lawrence Suydam
895 Secret Harbor Drive
South Lake Tahoe, CA 96150

Richard Munk
780 Eloise Ave.
South Lake Tahoe, CA 96150

N. McRae
3243 Rohner Drive
LaFayette, CA 94549

Robert Haney
PO BOX 14447
South Lake Tahoe, CA 96151

James Getz
597 Tahoe Island Drive
South Lake Tahoe, CA 96150

Carol Daum
PO BOX 550160
South Lake Tahoe, CA 96155

Edmund Viray
edmundviray@gmail.com

James Cullen
shawncullen1@att.net

Jerry Keyser
jkeyser@keysermarston.com

Danny Lukins, Manager
Lukins Brothers Water Co.
danny@lukinswater.com

Robert Mann, Plumas Bank
robert.mann@plumasbank.com

Oscar Guerrero
Oscar.Guerrero@waterboards.ca.gov

PRELIMINARY STATEMENT

(continued)

G. BALANCING ACCOUNTS

The company has established the following balancing accounts. The purpose of these accounts is to track changes in costs for the named expense category. The balance in these accounts will be recovered in rates after CPUC review and audit of the costs recorded therein. The accounts are listed with the authorizing CPUC Resolution, Decision or Public Utilities Code (PU Code).

1. Purchased Power, Resolution W-4467, April 22, 2004
2. Purchased Water, Resolution W-4467, April 22, 2004
3. Pump Tax, Resolution W-4467, April 22, 2004
4. Payroll, Resolution W-4467, April 22, 2004
5. Payroll Taxes, Resolution W-4467, April 22, 2004
6. Contract Labor, Resolution W-4467, April 22, 2004 Note: Restricted to the Operational and Maintenance portion of contract labor.
7. Water Quality Balancing Account (WQBA), Resolution W-4698, July 31, 2008
8. California Department of Public Health User Fee Balancing Account (UFBA), Resolution W-4698, July 31, 2018
Notes: Pertains to fees that are billed under Section 4017.10 of the California Health and Safety Code.
9. Water Contamination Litigation Expense Balancing Account, (N)

(To be inserted by utility)

Advice Letter No. 82-W

Decision No. 92-03-093, et al

Issued By

Jennifer Lukins

Manager

(To be inserted by P.U.C.)

Date Filed _____

Effective _____

Resolution No. _____

Schedule No. 1

**GENERAL METERED SERVICE
(continued)**

SPECIAL CONDITIONS (continued)

The surcharge shall be separately identified on each bill and in place for a period of 36 months from the effective date of Advice letter 59 until \$10029 of undercollected revenue per Res. W- 5026 is collected.

- 5. In the event that a customer terminates service under this schedule and reinstates service at the same location, there will be a reconnection charge (see Rule No. 11, C. Restoration of Service, 1. Reconnection Charge). Any customer, prior to resuming service within twelve months after such service was discontinued, will be required to pay all service charges and surcharges that would have been billed if service had not been discontinued.
- 6. A \$3.18 bill surcharge shall be applied to each customer's monthly water bill to amortize the Purchased Water Balancing Account of \$56,294.78. The surcharge shall be separately identified on each bill.
- 7. As authorized by the Commission, pursuant to PU Code Section 792.5 and Commission Decision 10-10-018, all bills are subject to a surcharge to recover the Water Contamination Litigation Expense Balancing Account (WCLEBA) for the years 2017-2019, in the amount of \$102,604.07, amortized over three years. A surcharge in the amount of \$2.91 shall be applied to each customer's monthly water bill beginning with the effective date of Advice Letter 82-W and continue until the 12/31/2019 balancing account balance, with interest, is recovered. The surcharge shall be separately identified on each bill.

(N)
|
(N)

(To be inserted by utility)

Advice Letter No. 82-W
Decision No. 92-03-093, et al

Issued By

Jennifer Lukins
Manager

(To be inserted by P.U.C.)

Date Filed _____
Effective _____
Resolution No. _____

Schedule No. 2A

ANNUAL FLAT RATE SERVICE
(continued)

SPECIAL CONDITIONS (continued)

9. In the event that a customer terminates service under this schedule and reinstates service at the same location, there will be a reconnection charge (see Rule No. 11, C. Restoration of Service, 1. Reconnection Charge). Any customer, prior to resuming service within twelve months after such service was discontinued, will be required to pay all service charges and surcharges that would have been billed if service had not been discontinued.

10. A \$2.76 monthly surcharge shall be applied to each customer's monthly water bill to amortize the Water Contamination Legal Expense Balancing Account for 36 months or until \$97,315.22 has been collected. The surcharge shall be separately identified on each bill.

(D)
|
(D)

11. As authorized by the Commission, pursuant to PU Code Section 792.5 and Commission Decision 10-10-018, all bills are subject to a surcharge to recover the Water Contamination Litigation Expense Balancing Account (WCLEBA) for the years 2017-2019, in the amount of \$102,604.07 amortized over three years. A surcharge in the amount of \$2.91 shall be applied to each customer's monthly water bill beginning with the effective date of Advice Letter 82-W and continue until the 12/31/2019 balancing account balance, with interest, is recovered. The surcharge shall be separately identified on each bill.

(N)
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(N)

(To be inserted by utility)

Advice Letter No. 82-W

Decision No. 92-03-093, et al

Issued By

Jennifer Lukins

Manager

(To be inserted by P.U.C.)

Date Filed _____

Effective _____

Resolution No. _____

TABLE OF CONTENTS

The following listed tariff sheets contain all effective rates and rules affecting the charges and services of the utility, together with other pertinent information.

<u>SUBJECT MATTER OF SHEET</u>	<u>P.U.C. SHEET NO.</u>	
Title Page	294-W	
Table of Contents	531-W, 496-W	(T)
Preliminary Statements	528-W, 62-W	(C)
Service Area Map	92-W	
Rate Schedules:		
Schedule No. 1 – General Metered Service	529-W, 481W, 482-W	(C)
Schedule No. 2A – Annual Flat Rate Service	530-W, 484-W, 477-W	(C)
Schedule No. 3 – Plumas Loan Surcharge	461-W	
Schedule No. 4 – Private Fire Protection Service	503-W, 442-W	
Schedule No. F – Facilities Fees	450-W	
Schedule No. LC – Late Payment Charge	436-W, 269-W	
Schedule No. UF – PUC Reimbursement Fee	505-W	
List of Contracts and Deviations	457-W	
Rules:		
No. 1 – Definitions	507-W, 508/-W	
No. 2 – Description of Serv	104-W	
No. 3 – Application for Service	361-W	
No. 4 – Contracts	119-W	
No. 5 – Special Information Required on Forms	509-W - 511-W	
No. 6 – Establishment and Re-establishment of Credit	120-W	
No. 7 – Deposits	355-W, 356-W	
No. 8 – Notices	512-W – 514-W	
No. 9 – Rendering and Payment of Bills	452-W, 455-W	
No. 10 – Disputed Bills	515-W, 516-W	
No. 11 – Discontinuance and Restoration of Service	517-W – 526-W	
No. 12 – Information Available to Public	130-W, 131-W	
No. 13 – Temporary Service	132-W, 131-W	
No. 14 – Continuity of Service	134-W	
No. 14.1 – Water Conservation & Rationing Plan	417-W – 424-W	
No. 15 – Main Extensions	297-W – 309-W; 281-W	
No. 16 – Service Connections, Meters, & Customer’s Facilities	310-W – 316-W	
No. 17 – Standards for Measurements of Service	135-W	
No. 18 – Meter Tests & Adjustment of Bills for Meter Error	136-W, 138-W	
No. 19 – Service to Separate Premises & Multiple Units and Resale of Water	218*W, 219-W	
No. 20 – Water Conservation	317-W	
No. 21 – Fire Protection	318-W	

(Continued)

(To be inserted by utility)

Advice Letter No. 82-W
Decision No. 92-03-093, et al

Issued By

Jennifer Lukins
Manager

(To be inserted by P.U.C.)

Date Filed _____
Effective _____

Resolution No.

Lukins Brothers Water Company
 Water Contamination Litigation Expense Memorandum Account
 AL# 82

Water Quality Balancing Account

Start: 6/1/2017

VENDOR	DATES	INVOICE NO.	AMOUNT BILLED	DESCRIPTION
Robins Borghei	7/28/2017	1357	\$ 17,671.53	Legal Fees 6/1/17-6/30/17
Robins Borghei	8/29/2017	1386	\$ 5,853.73	Legal Fees 7/1/17-7/31/17
Robins Borghei	9/25/2017	1416	\$ 5,865.85	Legal Fees 8/1/17-8/31/17
Robins Borghei	10/30/2017	1449	\$ 8,405.70	Legal Fees 9/1/17-9/30/17
Robins Borghei	11/30/2017	1451	\$ 2,692.10	Legal Fees 10/1/17-10/31/17
Robins Borghei	12/29/2017	1454	\$ 341.80	Legal Fees 11/1/17-11/30/17
Robins Borghei	1/31/2018	43123	\$ 989.30	Legal Fees 12/1/17-12/31/17
Robins Borghei	3/7/2018	43375	\$ 2,034.30	Legal Fees 1/1/18-1/31/18
Robins Borghei	3/31/2018	43848	\$ 5,314.63	Legal Fees 2/1/18-2/28/18
Robins Borghei	5/8/2018	43906	\$ 3,318.23	Legal Fees 3/1/18-3/31/18
Robins Borghei	6/20/2018	44306	\$ 5,906.27	Legal Fees 4/1/18-5/31/18
Robins Borghei	7/20/2018	44592	\$ 49.00	Legal Fees 6/1/18-6/30/18
Robins Borghei	8/22/2018	44862	\$ 122.50	Legal Fees 7/1/18-7/31/18
Robins Borghei	10/25/2018	45450	\$ 1,636.80	Legal Fees 8/1/18-9/30/18
Robins Borghei	11/19/2018	45637	\$ 646.00	Legal Fees 10/1/18-10/31/18
Robins Borghei	12/19/2018	45876	\$ 70.00	Legal Fees 11/1/18-11/30/18
Robins Borghei	1/31/2019	46199	\$ 118.20	Legal Fees 12/1/18-12/31/18
Robins Borghei	2/28/2019	46425	\$ 10,934.10	Legal Fees 1/1/19-1/31/19
Robins Borghei	3/28/2019	46739	\$ 192.50	Legal Fees 2/1/19-2/28/19
Robins Borghei	4/23/2019	46897	\$ 309.97	Legal Fees 3/1/19-3/31/19
Robins Borghei	5/29/2019	47271	\$ 2,696.77	Legal Fees 4/1/19-4/30/19
Robins Borghei	6/24/2019	47515	\$ 9,511.54	Legal Fees 5/1/19-5/31/19
Robins Borghei	7/26/2019	47803	\$ 200.44	Legal Fees 6/1/19-6/30/19
Robins Borghei	8/30/2019	48114	\$ 401.72	Legal Fees 7/1/19-7/31/19
Robins Borghei	9/30/2019	48414	\$ 3,046.41	Legal Fees 8/1/19-8/31/19
Robins Borghei	10/28/2019	48652	\$ 5,593.50	Legal Fees 9/1/19-9/30/19
Robins Borghei	11/25/2019	48908	\$ 258.40	Legal Fees 10/1/19-10/31/19

Robins Borghei 12/31/2019 49219 \$ 3,133.93 Legal Fees 11/1/19-11/30/19

SUB TOTAL	\$ 97,315.22
City of South Lake Tahoe Franchise Fee- 2%	\$ 1,946.30
City of South Lake Tahoe Business License Fee \$1.07/\$1000	\$ 104.13
Interest at 90-Day Commerical Paper Rate	\$ 3,238.42
TOTAL TO AMORITZE	\$ 102,604.07

<u>Requested Surcharge</u>	No.	1x Surcharge	36 -Month Surcharge
Metered Customers	149	\$ 104.70	\$ 2.91
Flat Rate Customers	831	\$ 104.70	\$ 2.91
Totals	980	102604	

Amounts by Year:

2017 (January - December)	41,820
2018 (January - December)	19,216
2019 (January - Dec)	<u>36,279</u>
Total Under Collection	<u><u>97,315</u></u>
Plus: Interest at 90-day Commercial Paper Rates	3,238
Plus: City of South Lake Tahoe Franchise Fee- 2%	1,946
Plus: Business License Tax - 0.107% (Grossed Up)	<u>104</u>
Amount to be Recovered through Surcharge	<u><u>102,604</u></u>

Surcharge Calculation:

Amount to be Recovered	102,604
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<u>Month</u>	<u>Amount</u>	<u>Total Amount</u>	<u>Annualized 90-Day Commercial Paper Rate</u>	<u>Monthly Interest Provision</u>	<u>Interest Provision</u>
2017-01	-	-	0.80%	\$ -	
2017-02	-	-	0.77%	\$ -	
2017-03	-	-	0.87%	\$ -	
2017-04	-	-	0.92%	\$ -	
2017-05	-	-	0.95%	\$ -	
2017-06	\$ 17,671.53	17,671.53	1.10%	\$ 16.20	
2017-07	\$ 5,853.73	23,525.26	1.17%	\$ 22.94	
2017-08	\$ 5,865.85	29,391.11	1.18%	\$ 28.90	
2017-09	\$ 8,405.70	37,796.81	1.18%	\$ 37.17	
2017-10	\$ 2,692.10	40,488.91	1.21%	\$ 40.83	
2017-11	\$ 341.80	40,830.71	1.28%	\$ 43.55	
2017-12	\$ 989.30	41,820.01	1.43%	\$ 49.84	
2018-01	\$ 2,034.30	43,854.31	1.59%	\$ 58.11	
2018-02	\$ 5,314.63	49,168.94	1.69%	\$ 69.25	
2018-03	\$ 3,318.23	52,487.17	1.90%	\$ 83.10	
2018-04	\$ -	52,487.17	2.00%	\$ 87.48	
2018-05	\$ 5,906.27	58,393.44	2.03%	\$ 98.78	
2018-06	\$ 49.00	58,442.44	2.08%	\$ 101.30	
2018-07	\$ 122.50	58,564.94	2.12%	\$ 103.46	
2018-08	\$ -	58,564.94	2.12%	\$ 103.46	
2018-09	\$ 1,636.80	60,201.74	2.19%	\$ 109.87	
2018-10	\$ 646.00	60,847.74	2.31%	\$ 117.13	
2018-11	\$ 70.00	60,917.74	2.45%	\$ 124.37	
2018-12	\$ 118.20	61,035.94	2.52%	\$ 128.18	
2019-01	\$ 10,934.10	71,970.04	2.55%	\$ 152.94	
2019-02	\$ 192.50	72,162.54	2.49%	\$ 149.74	
2019-03	\$ 309.97	72,472.51	2.49%	\$ 150.38	
2019-04	\$ 2,696.77	75,169.28	2.47%	\$ 154.72	
2019-05	\$ 9,511.54	84,680.82	2.44%	\$ 172.18	
2019-06	\$ 200.44	84,881.26	2.31%	\$ 163.40	
2019-07	\$ 401.72	85,282.98	2.19%	\$ 155.64	
2019-08	\$ 3,046.41	88,329.39	2.07%	\$ 152.37	
2019-09	\$ 5,593.50	93,922.89	1.95%	\$ 152.62	
2019-10	\$ 258.40	94,181.29	1.80%	\$ 141.27	
2019-11	\$ 3,133.93	97,315.22	1.62%	\$ 131.38	
2019-12	-	97,315.22	1.70%	\$ 137.86	
Total	97,315.22	85,282.98		\$ 3,238.42	