

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company, d/b/a )  
Ameren Missouri's Tariff to Increase Its Revenues ) Case No. ER-2014-0258  
for Electric Service )

**WAL-MART STORES EAST, LP, AND SAM'S EAST, INC.'S  
AMENDED MOTION TO SUBSTITUTE COMPLETED SCHEDULES  
TO PREFILED TESTIMONY  
AND MOTION FOR EXPEDITED TREATMENT**

Pursuant to 4 240-2.080, Wal-Mart Stores East, LP, and Sam's East, Inc., (collectively "Walmart") submit this amended motion ("Amended Motion") to substitute completed schedules for those previously filed in this docket.

Walmart also requests expedited treatment of this Amended Motion. In support of this Amended Motion Walmart states as follows:

1. On December 19, 2014, the Direct Testimony And Schedules Of Steve W. Chriss were filed on behalf of Walmart. Attached to Mr. Chriss' testimony were hard copies of Schedules SWC-8 through SWC-14. The original electronic versions of Schedules SWC-8 through SWC-14 were subsequently circulated to all parties on December 23, 2014.

2. It has come to Walmart's attention that the schedules attached to Mr. Chriss' testimony were incomplete and do not include all of the information from the underlying electronic schedules. Attached are hard copies of the complete electronic files that were circulated to the parties on December 23, 2014.

3. By this Amended Motion Walmart seeks to have the attached schedules accepted for filing and substituted in place of those originally attached to Mr. Chriss' testimony. There are no substantive differences between the original schedules attached to Mr. Chriss' testimony and those attached to this Amended Motion. However,

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the attached schedules are complete, whereas those attached to Mr. Chriss' testimony were incomplete.

4. Rebuttal testimony is due in this case on January 16, 2015. Because the rebuttal filing date is quickly approaching, expedited treatment of this Amended Motion is essential. Without expedited treatment additional rebuttal testimony is likely addressing differences between the hard copies and electronic copies of Schedules SWC-8 through SWC-14. Substituting the attached schedules will conform the hard copies filed of record in this docket with the electronic files circulated to the parties. Judicial economy will be promoted by avoiding the need for parties to address the issue in rebuttal testimony, as well as avoiding confusion that may arise at the evidentiary hearing. No party will be prejudiced by the requested relief since the parties have had the complete electronic schedules since December 23, 2014.

5. The initial Wal-Mart Stores East, LP, And Sam's East, Inc.'s Motion To Substitute Completed Schedules To Prefiled Testimony And Motion For Expedited Treatment ("Motion") was filed January 6, 2015. Upon filing the original Motion, the undersigned counsel determined that one of the columns on Schedule SWC-14 failed to print. This Amended Motion is being filed to provide the Commission and the parties with accurate hard copies of Mr. Chriss' schedules.

6. For these reasons, Walmart requests that the Commission act upon this Amended Motion as soon as possible so that the corrected schedules are available prior to the filing of rebuttal testimony.

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WHEREFORE, Wal-Mart Stores East, LP, and Sam's East, Inc., respectfully request that the Commission expeditiously grant this Amended Motion and accept the attached Schedules SWC-8 through SWC-14 as substitutes for the original schedules attached to Mr. Chriss' December 19, 2014, testimony.

Dated this 6<sup>th</sup> day of January, 2015.

Respectfully submitted,

By 

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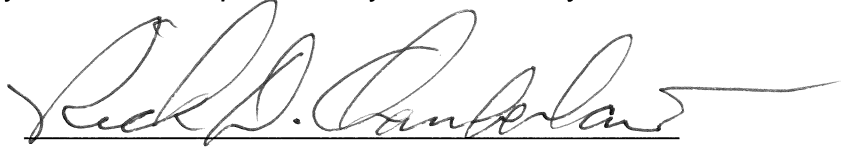
ATTORNEYS FOR WAL-MART STORES  
EAST, LP, AND SAM'S EAST, INC.

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 6, 2015, a true and correct copy of the foregoing Motion was served by U.S. mail, postage prepaid, or by electronic mail addressed to all parties by their attorneys of record as provided by the Secretary of the Commission.

  
Rick D. Campbell

### Calculation of Rate of Return Index by Customer Class

Customer Class	Rate of Return (%) (1)	Rate of Return Index Value (2) (1) / Total Missouri
Residential	2.73%	0.62
Small General Service	6.12%	1.38
Large General Service/Small Primary	7.57%	1.71
Large Primary	4.22%	0.95
Large Transmission	1.64%	0.37
Lighting	4.58%	1.03
<b>Total Missouri</b>	<b>4.44%</b>	<b>1.00</b>

Source: Schedule WMW-1

**Calculation of Large General Service (“LGS”) and Small Primary Service (“SP”) Rate of Return Index Values**

<b>Case</b>	<b>LGS/SP Rate of Return</b>	<b>Total Missouri Rate of Return</b>	<b>Rate of Return Index Value</b>
	( <b>%</b> )	( <b>%</b> )	( <b>3</b> )
	<b>(1)</b>	<b>(2)</b>	<b>(1) / (3)</b>
ER-2007-0002 (LGS)	5.86%	2.74%	2.14
ER-2007-0002 (SP)	4.47%	2.74%	1.63
ER-2008-0318	7.01%	4.06%	1.73
ER-2010-0036	6.12%	1.89%	3.24
ER-2011-0028	8.26%	4.59%	1.80
ER-2012-0166	6.32%	2.89%	2.19
Present Case	7.57%	4.44%	1.71

Sources:

- Case No. ER-2007-0002, Exhibit WMW-1
- Case No. ER-2008-0318, Exhibit WMW-E1
- Case No. ER-2010-0036, Exhibit WMW-E1
- Case No. ER-2011-0028, Exhibit WMW-E1
- Case No. ER-2012-0166, Exhibit WMW-E1

**Demonstration of Proposed Revenue Allocation Methodology**

**Revenue Requirement Decrease From Proposed** **\$ (37,503,000)**

Customer Class	Current Revenues	Proposed Increase	Allocation of Proposed Increase	Revenue Neutral Shift, Ameren COSS	25 Percent Movement	Allocation of Overall RR Reduction	Net Revenue Change	Amount to Mitigate	
	(\$)	(\$)	(%)	(\$)	(\$)	(\$)	(\$)	(\$)	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
			(2) / Total		(4) x 0.25	RRR x (3)	(2) + (5) + (6)	(7) / (1)	
								(9)	
								(8) - (2)	
Residential	\$ 1,230,497,365	\$ 118,691,987	45.0%	\$ 62,576,000	\$ 15,644,000	\$ (16,860,154)	\$ 117,475,833	9.55%	\$ -
Small General Service	\$ 302,777,223	\$ 29,203,178	11.1%	\$ (13,391,000)	\$ (3,347,750)	\$ (4,148,301)	\$ 21,707,127	7.17%	\$ -
Large General Service	\$ 576,863,372	\$ 55,613,798	21.1%	\$ (42,943,155)	\$ (10,735,789)	\$ (7,899,920)	\$ 36,978,089	6.41%	\$ -
Small Primary	\$ 227,596,391	\$ 21,940,323	8.3%	\$ (16,942,845)	\$ (4,235,711)	\$ (3,116,615)	\$ 14,587,997	6.41%	\$ -
Large Primary	\$ 202,782,047	\$ 19,541,992	7.4%	\$ 1,030,000	\$ 257,500	\$ (2,775,933)	\$ 17,023,559	8.40%	\$ -
Large Transmission	\$ 159,333,049	\$ 15,361,303	5.8%	\$ 9,830,000	\$ 2,457,500	\$ (2,182,068)	\$ 15,636,735	9.81%	\$ 275,432
Lighting	\$ 37,876,368	\$ 3,653,717	1.4%	\$ (158,000)	\$ (39,500)	\$ (519,009)	\$ 3,095,208	8.17%	\$ -
MSD	\$ 73,018	\$ 7,044	0.0%	\$ -	\$ -	\$ (1,001)	\$ 6,043	8.28%	\$ -
<b>Total</b>	<b>\$ 2,737,798,833</b>	<b>\$ 264,013,342</b>					<b>\$ 226,510,592</b>		

Note: The LGS and SP revenue neutral shifts sum to (\$59,886,000) per the COSS and are allocated on the basis of current revenues.

Sources:

(1) - (2): Direct Testimony of William R. Davis, Table 4

(4): UE\_DIR-UE-Dir\_007-Att-MO ECCOS\_2015 Filed 7\_3\_14.xls, SCH 2

## Determination of LGS and SP Cost of Service and Revenues by Customer, Demand, and Energy

Function	Cost of Service by Function		Large General Service		Small Primary	
	Class Cost of Service		Revenue by Function		Revenue by Function	
	(\$000)	(%)	Current Rates		Current Rates	
	(1)	(2)	(\$000)	(%)	(\$000)	(%)
	(1) / Total		(3)	(4)	(5)	(6)
			(3) / Total		(5) / Total	
Customer	\$ 17,957	2.2%	\$ 12,109	1.9%	\$ 2,631	1.1%
<i>Production - Demand</i>	\$ 376,932	46.3%				
<i>Transmission - Demand</i>	\$ 35,600	4.4%				
<i>Distribution - Demand</i>	\$ 124,989	15.4%				
Total Demand	\$ 537,521	66.1%	\$ 73,357	11.7%	\$ 20,867	8.4%
Energy	\$ 258,015	31.7%	\$ 542,149	86.4%	\$ 225,016	90.5%
<b>Total Non-EE Revenue</b>	<b>\$ 813,493</b>	<b>166%</b>	<b>\$ 627,614</b>	<b>100%</b>	<b>\$ 248,514</b>	<b>100%</b>

Sources:

Schedule SWC-12 and Schedule SWC-13

William M. Warwick Workpapers, Unbundled



**Large General Service Rate Comparison  
Ameren Missouri  
Weather Normalized-12 months ending March 2014  
Growth to December 2014**

<u>Billing Components</u>			
<u>Summer (June - September)</u>			
	Rate	Units	\$
Customer Charge Per Month	\$88.32	41,449	\$3,660,804
Customer Charge TOD Per Month	\$107.82	164	\$17,637
Low Income Program Charge Per Month	\$0.00	41,613	\$0
Energy Charge (¢ per kWh)			
First 150 kWh per KW	9.89 ¢	1,163,123,672	\$115,032,931
Next 200 kWh per KW	7.44 ¢	1,263,783,662	\$94,025,504
All over 350 kWh per KW	5.00 ¢	504,528,272	\$25,226,414
TOD On Peak Adjust. per Kwh	1.17 ¢	5,589,865	\$65,401
TOD Off Peak Adjust. per Kwh	-0.66 ¢	11,780,036	-\$77,748
Energy Efficiency per Kwh	0.08 ¢	2,931,435,606	\$2,345,148
Opt Out EE per Kwh	-0.08 ¢	61,561,735	-\$49,249
Demand			
Per KW of Billing Demand	\$4.62	8,516,045	\$39,344,128
<u>Winter (October - May)</u>			
Customer Charge Per Month	\$88.32	82,853	\$7,317,570
Customer Charge TOD Per Month	\$107.82	312	\$33,631
Low Income Program Charge Per Month	\$0.00	83,165	\$0
Energy Charge (¢ per kWh)			
First 150 kWh per KW	6.23 ¢	1,894,055,751	\$117,999,673
Next 200 kWh per KW	4.62 ¢	2,061,036,697	\$95,219,895
All over 350 kWh per KW	3.63 ¢	848,824,811	\$30,812,341
Seasonal Energy Charge	3.63 ¢	437,409,324	\$15,877,958
TOD On Peak Adjust. per Kwh	0.35 ¢	8,747,861	\$30,618
TOD Off Peak Adjust. per Kwh	-0.20 ¢	18,866,345	-\$37,733
Energy Efficiency per Kwh	0.05 ¢	5,241,326,584	\$2,620,663
Opt Out EE per Kwh	-0.05 ¢	106,807,282	-\$53,404
Demand			
Per KW of Billing Demand	\$1.71	16,053,326	\$27,451,187
		8,172,762,190	\$576,863,372

Target	\$632,510,082								
Increase	9.78%								
Proposed Rate	\$96.96	\$4,018,926	96.96	\$4,018,798					
	\$118.34	\$19,358	118.36	\$19,362					
	\$0.00	\$0	0.00	\$0					
	10.86	\$126,315,231	10.857	\$126,282,117				\$33,114	
	8.17	\$103,251,125	8.168	\$103,220,353				\$30,772	
	5.49	\$27,698,602	5.489	\$27,693,330				\$5,272	
	1.28	\$71,550	1.28	\$71,797				-\$247	
	-0.72	-\$84,816	-0.72	-\$85,351				\$535	
	0.08	\$2,345,148	0.08	\$2,277,922				\$67,227	
	-0.08	-\$49,249	-0.08	-\$47,838				-\$1,412	
	\$5.07	\$43,176,349	5.072	\$43,191,630					
	\$96.96	\$8,033,419	96.96	\$8,033,163					
	\$118.34	\$36,912	118.36	\$36,920					
	\$0.00	\$0	0.00	\$0					
	6.84	\$129,553,413	6.839	\$129,538,980				\$14,434	
	5.06	\$104,288,457	5.072	\$104,531,544				-\$243,088	
	3.97	\$33,698,345	3.985	\$33,825,510				-\$127,165	
	3.97	\$17,365,150	3.985	\$17,430,680				-\$65,530	
	0.38	\$33,242	0.38	\$33,612				-\$370	
	-0.22	-\$41,506	-0.22	-\$41,423				-\$83	
	0.05	\$2,620,663	0.0456	\$2,392,056				\$228,608	
	-0.05	-\$53,404	-0.0456	-\$48,745				-\$4,659	
	\$1.88	\$30,180,253	1.877	\$30,135,667					
		\$632,477,169		\$632,510,082					
		\$55,613,798							
Variance		-\$32,913		\$0					

EE	Pre-MEEIA
Summer	\$2,295,899
Winter	\$2,567,260
	\$4,863,159
	\$289,764

	KWH	Allocation for Seasons	Total Pre-MEEIA
Summer	2,869,873,871	\$275,912,530	\$4,573,395
Winter	5,134,519,303	\$289,921,200	\$2,230,084
Total		\$565,833,730	\$2,343,310

**Small Primary Service Rate Comparison  
Ameren Missouri  
Weather Normalized-12 months ending March 2014  
Growth to December 2014**

Billing Components					Target	\$249,551,313				
					Increase	0.09817				
					Proposed Rate					
					Rate	Units	\$			
<b>Summer (June - September)</b>										
Customer Charge	Per Month	\$299.60	2,581	\$773,221	\$328.50	\$847,807	299.60	\$773,221	-\$74,586	
Customer Charge TOD	Per Month	\$319.10	80	\$25,440	\$349.88	\$27,894	350.43	\$27,938	\$44	
Low Income Program Ch	Per Month	\$0.00	2,661	\$0	\$0.00	\$0	0.00	\$0		
Energy Charge (¢ per kWh)										
First 150 kWh per KW		9.56 ¢	426,374,728	\$40,761,424	10.50	\$44,769,346	10.499	\$44,763,037	-\$6,309	
Next 200 kWh per KW		7.20 ¢	518,519,003	\$37,333,368	7.92	\$41,066,705	7.907	\$40,998,444	-\$68,261	
All over 350 kWh per KW		4.83 ¢	362,631,332	\$17,515,093	5.30	\$19,219,461	5.304	\$19,234,578	\$15,117	
TOD On Peak Adjust. per Kwh		0.85 ¢	14,767,819	\$125,526	0.93	\$137,341	0.93	\$137,850	\$509	
TOD Off Peak Adjust. per Kwh		-0.48 ¢	30,611,835	-\$146,937	-0.53	-\$162,243	-0.53	-\$161,362	\$881	
Energy Efficiency per Kwh		0.09 ¢	1,307,525,062	\$1,176,773	0.09	\$1,176,773	0.09	\$1,162,152	-\$14,621	
Opt Out EE per Kwh		-0.09 ¢	85,416,638	-\$76,875	-0.09	-\$76,875	-0.09	-\$75,920	\$955	
Demand										
Per KW of Billing Demand		\$3.82	2,904,959	\$11,096,944	\$4.20	\$12,200,828	4.20	\$12,186,348	-\$14,480	
Billing Kvars		35 ¢	539,541	\$188,839	38	\$205,025	38.44	\$207,378	\$2,352	
Rider B 34kv										
Per KW		114 ¢	325,931	-\$371,561	125	-\$407,414	125.19	-\$408,038	-\$624	
Rider B 138kv										
Per KW		135 ¢	2,354	-\$3,178	148	-\$3,484	148.25	-\$3,490	-\$6	
<b>Winter (October - May)</b>										
Customer Charge	Per Month	\$299.60	5,179	\$1,551,647	\$328.50	\$1,701,322	329.01	\$1,703,975	\$2,653	
Customer Charge TOD	Per Month	\$319.10	155	\$49,576	\$349.88	\$54,358	350.43	\$54,443	\$85	
Low Income Program Ch	Per Month	\$0.00	5,334	\$0	\$0.00	\$0	0.00	\$0		
Energy Charge (¢ per kWh)										
First 150 kWh per KW		6.02 ¢	705,889,897	\$42,494,572	6.61	\$46,659,322	6.611	\$46,666,331	\$7,009	
Next 200 kWh per KW		4.47 ¢	869,363,383	\$38,860,543	4.91	\$42,685,742	4.909	\$42,675,544	-\$10,198	
All over 350 kWh per KW		3.50 ¢	623,212,439	\$21,812,435	3.84	\$23,931,358	3.844	\$23,953,797	\$22,439	
Seasonal Energy Charge		3.50 ¢	175,041,509	\$6,126,453	3.84	\$6,721,594	3.844	\$6,727,896	\$6,302	
TOD On Peak Adjust. per Kwh		0.32 ¢	24,528,233	\$78,490	0.35	\$85,849	0.35	\$86,196	\$347	
TOD Off Peak Adjust. per Kwh		-0.17 ¢	51,839,857	-\$88,128	-0.19	-\$98,496	-0.19	-\$96,779	\$1,716	
Energy Efficiency per Kwh		0.06 ¢	2,373,507,227	\$1,424,104	0.05	\$1,186,754	0.05	\$1,276,821	\$90,067	
Opt Out EE per Kwh		-0.06 ¢	166,671,696	-\$100,003	-0.05	-\$83,336	-0.05	-\$89,660	-\$6,325	
Demand										
Per KW of Billing Demand		\$1.39	5,321,815	\$7,397,322	\$1.53	\$8,142,376	1.53	\$8,123,529	-\$18,847	
Billing Kvars		35 ¢	837,881	\$293,258	38	\$318,395	38.44	\$322,048	\$3,653	
Rider B 34kv										
Per KW		114 ¢	610,802	-\$696,315	125	-\$763,503	125.19	-\$764,673	-\$1,170	
Rider B 138kv										
Per KW		135 ¢	4,180	-\$5,642	148	-\$6,186	148.25	-\$6,196	-\$11	
						\$249,536,714		\$249,475,405		
					Variance	-\$14,599		-\$75,908		

EE	Pre-MEEIA
Summer	\$1,099,898
Winter	\$1,324,101
	\$2,423,999

	KWH	Allocation for Seasons	Total Pre-MEEIA
Summer	1,222,108,424	\$107,599,416 0.478	\$1,086,232
Winter	2,206,835,531	\$117,597,091 0.522	\$1,187,160
Total		\$225,196,507	

**Calculation of Effective Demand Rates, Proposed LGS Summer**

(1)	<b>Rate</b>	LGS Summer	
(2)	<b>Customer Demand</b>	1,000	kW
(3)	<b>LGS Summer Non-EE Revenues</b>	\$ 304,466,325	
(4)	<b>% Energy, Cost of Service Study</b>	31.7%	
(5)	(3) x (4) <b>Non-EE Energy Revenues, COS</b>	\$ 96,567,369	
(6)	<b>Total Billing kWh</b>	2,931,435,606	kWh
(7)	(5) / (6) <b>Cost of Service Energy Rate</b>	\$ 0.03294	/kWh
(8)	<b>Proposed Billing Demand Rate (BDR)</b>	\$ 5.07	/kW
(9)	<b>% Demand, Cost of Service Study</b>	66.1%	
(10)	(3) x (9) <b>Non-EE Demand Revenues, COS</b>	\$ 201,178,183	
(11)	<b>Total Billing kW</b>	8,516,045	
(12)	(10) / (11) <b>Full Cost Demand Rate (FCDR)</b>	\$ 23.62	/kW

(13)	Hours of Use	kWh	Load Factor	Proposed Energy Rate	Cost of Service Energy Rate	Demand Portion of Energy Rate	Billed Demand Cost from Energy Rate	Effective Demand Rate from Energy Rate	Total Demand Rate	Effective Subsidy (Received) / Paid
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
			(%)	(\$/kWh)	(\$/kWh)	(\$/kWh)	(\$)	(\$/kW)	(\$/kW)	(\$/kW)
				Ex SWC-7		(4) - (5)		(7) / kW Demand	(8) + BDR	(9) - FCDR
	1	1,000	0.1%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 76	\$ 0.08	\$ 5.15	\$ (18.48)
	72	72,000	10.0%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 5,447	\$ 5.45	\$ 10.52	\$ (13.11)
	144	144,000	20.0%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 10,895	\$ 10.89	\$ 15.96	\$ (7.66)
	150	150,000	20.8%	\$ 0.10860	\$ 0.03294	\$ 0.07566	\$ 11,349	\$ 11.35	\$ 16.42	\$ (7.20)
	216	216,000	30.0%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 14,567	\$ 14.57	\$ 19.64	\$ (3.99)
	288	288,000	40.0%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 18,077	\$ 18.08	\$ 23.15	\$ (0.48)
	297	297,000	41.3%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 18,516	\$ 18.52	\$ 23.59	\$ (0.04)
	298	298,000	41.4%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 18,565	\$ 18.56	\$ 23.63	\$ 0.01
	350	350,000	48.6%	\$ 0.08170	\$ 0.03294	\$ 0.04876	\$ 21,100	\$ 21.10	\$ 26.17	\$ 2.55
	360	360,000	50.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 21,320	\$ 21.32	\$ 26.39	\$ 2.77
	432	432,000	60.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 22,901	\$ 22.90	\$ 27.97	\$ 4.35
	504	504,000	70.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 24,482	\$ 24.48	\$ 29.55	\$ 5.93
	576	576,000	80.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 26,063	\$ 26.06	\$ 31.13	\$ 7.51
	648	648,000	90.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 27,644	\$ 27.64	\$ 32.71	\$ 9.09
	720	720,000	100.0%	\$ 0.05490	\$ 0.03294	\$ 0.02196	\$ 29,225	\$ 29.22	\$ 34.29	\$ 10.67

Sources:  
 Schedule SWC-11  
 Schedule SWC-12