Exhibit No.: ______________
Issues: Imputed Revenues and Misc. Issues
Witness: Scott F. Klemm
Type of Exhibit: Direct Testimony
Sponsoring Party: Southern Missouri Gas Company, L.P.
Case No.: GR-2001-388

MISSOURI PUBLIC SERVICE COMMISSION

SOUTHERN MISSOURI GAS COMPANY, L.P.

CASE NO. GR-2001-388

TESTIMONY OF

SCOTT F. KLEMM

Jefferson City, Missouri

January 9, 2003

Exhibit No. 3
Case No(s). GR-2001-388
Date 3-11-03 Rptr KF

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of Southern Missouri Gas Company, L.P.'s Purchased Gas Adjustment Factors to be Reviewed in Its 1999-2000 and 2000-2001 Actual Cost Adjustment.	)))))	Case No. GR-2001-388

AFFIDAVIT OF

SCOTT F. KLEMM

Scott F. Klemm, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Direct Testimony of Scott F. Klemm"; that said testimony and schedules attached thereto was prepared by him and/or under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information and belief.

Scott F. Klemm
Scott F. Klemm

Subscribed and sworn to before me this 9th day of January, 2003.

Judith A. Reynolds
Notary Public

My Commission expires

JUDITH A. REYNOLDS
NOTARY
My Comm. Expires
April 18, 2004
Cole County
PUBLIC
STATE OF MISSOURI

TESTIMONY OF SCOTT KLEMM

CASE NO. GR-2001-388

January 9, 2003

Q. WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?

A. My name is Scott F. Klemm and my business address is 301 East 17th Street, Mountain Grove, MO 65711.

Q. BY WHOM ARE YOU EMPLOYED?

A. I am employed by Southern Missouri Gas Company, L.P. ("SMGC") as Vice-President. My responsibilities include supervising all aspects of the SMGC's operations in Missouri, including regulatory matters.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL EXPERIENCE.

A. I attended Eastern Michigan University in Ypsilanti, Michigan, where I received a Bachelor of Science degree in Business Administration, with a major in Accounting, in December 1985. In May 1987, I successfully completed the Uniform Certified Public Accountant (CPA) examination and subsequently received the CPA certificate. I am currently licensed as a CPA in the State of Ohio. In January 1986, I joined Arthur Young (now Ernst & Young) in the Toledo, Ohio office as an auditor. I audited numerous clients from small closely held companies to SEC corporations. I held the position of Senior Staff Auditor when I left the firm in September 1988 to join Citizens Gas Fuel Company ("Citizens"), a small natural gas utility in Adrian, Michigan. I began my career at Citizens as an accountant and have served in several capacities. I presently serve as the Vice President and General Manager being responsible for all aspects of Citizens' operations. Citizens was acquired by MCN Energy Group Inc. in 1990. In 1995, MCN became a partner in SMGC. Since 1995, I have served various roles in overseeing MCN's investment in SMGC. In May 2001, I (through Citizens) was retained by SMGC to manage all aspects of the SMGC's operations in Missouri, including regulatory matters.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. The purpose of my testimony is to respond to the recommendation filed by the Staff ("Staff") of the Missouri Public Service Commission ("Commission") in the Actual Cost Adjustment ("ACA") case (Case No. GR-2001-388).

Q. WHAT ACA PERIOD IS INVOLVED IN THIS PROCEEDING?

A. The ACA period in this proceeding is September 1, 2000 to August 31, 2001.

Q. IDENTIFY THE SERVICE AREAS THAT ARE THE SUBJECT OF THIS CASE.

A. This case involves the entire service area of SMGC.

Q. PLEASE DESCRIBE YOUR UNDERSTANDING OF THE RECOMMENDATION SUBMITTED BY THE STAFF REGARDING SMGC'S TRANSPORTATION SERVICE TO TWO LARGE INDUSTRIAL CUSTOMERS.

A. The Staff is recommending that the Company decrease the firm sales ACA balance by $105,809. The amount is based upon imputed revenues from two industrial customers, assuming that these customers had paid the full authorized PGA rate.

Q. DO YOU AGREE WITH THE STAFF'S PROPOSAL?

A. No. The Company strongly disagrees that there should be a reduction of $105,809 to the firm sales ACA balance related to transportation service and gas supply to these customers.

Q. WHY DO YOU DISAGREE WITH THE STAFF'S PROPOSED ADJUSTMENT?

A. Staff's position is based upon the unrealistic assumption that, absent the measures taken by the Company to retain two industrial customers on the system, there would have been an increase of revenues of $105,809, "if the gas had been sold at the authorized PGA-adjusted rate." (Staff Recommendation, App. A, page 6 of 8). If the Company had not taken the steps necessary to compete with alternative fuels for these two industrial customers, it is probable that these two industrial customers would have left the SMGC system, or substantially reduced their throughput. **In fact, one of the industrial customers subsequently (in October, 2001) did substantially**

reduce its throughput by switching much of their production load to an alternative energy source.[1] As recognized by Staff, "[r]educed throughput would result in the fixed transportation costs being allocated over smaller volumes thus increasing the Purchased Gas Cost." (Staff Recommendation, App. A, page 6 of 8). This result would have harmed SMGC's remaining ratepayers. SMGC strongly believes the actions taken by it to maintain these two industrial customers upon its system were prudent and reasonable.

Q. PLEASE DISCUSS CIRCUMSTANCES SURROUNDING THE COMPANY'S DECISION TO OFFER TRANSPORTATION SERVICE AND GAS SUPPLIES TO THE TWO INDUSTRIAL CUSTOMERS?

A. When SMGC increased its gas supply rates on February 1, 2001, it caused two large volume industrial customers to contact SMGC expressing concern over our rates, and indicating to SMGC that they were strongly considering switching to alternative sources of energy. Since the loss of this load would negatively impact SMGC and its remaining customers, SMGC began reviewing its options for competing with the alternative sources of supply for these customers.

Q. WHAT OPTIONS DID SMGC REVIEW WHEN THE INDUSTRIAL COMPANIES APPROACHED SMGC REGARDING THE POSSIBILITY THAT THE INDUSTRIALS WOULD SWITCH SOURCES OF ENERGY SUPPLIES?

[1] At that time, this industrial customer was switched to a Large General Service rate for its remaining natural gas usage.

A. We reviewed the following options: (1) Do nothing and risk losing the industrial companies as customers of SMGC; (2) Lower the industrial companies' commodity charges but continue to classify the industrial companies as gas sales customers; (3) Put the industrial companies in touch with third-party marketers for their gas supply, and SMGC would provide transportation service only; and (4) Provide the industrial companies with transportation service and SMGC also provide the gas supply.

Q. WHY DID YOU REJECT THE FIRST OPTION OF DOING NOTHING AND RISKING LOSING THE INDUSTRIAL COMPANIES AS CUSTOMERS OF SMGC.

A. After careful consideration, SMGC determined that the probability of losing the industrial companies as customers was high if SMGC chose to do nothing. If this option was chosen, then the loss of sales volumes would negatively impact the gas sales customers of SMGC almost immediately through: (1) a higher Purchased Gas Adjustment ("PGA") rate, and (2) a higher Actual Cost Adjustment ("ACA") rate or the under-collected gas cost would have to be recovered over a longer period. In addition, SMGC risked the loss of revenues from the monthly customer charge and the commodity charges. Such lost revenues would eventually impact the rates of other SMGC customers in the future (i.e. rates increases for remaining customers).

Q. CAN YOU QUANTIFY THE IMPACT OF THE LOSS OF THESE INDUSTRIAL CUSTOMERS UPON SMGC AND ITS REMAINING RATEPAYERS WITH RESPECT TO FIXED TRANSPORTATION COSTS?

A. Yes. In calendar year 2000, total gas sales were 9,514,780 Ccfs, including 1,471,440 Ccfs (representing 15.46% of total gas sales) for these two customers. Without these industrial customers, gas sales would have been 8,043,340 Ccfs. The annual fixed transportation cost of $1,058,300 is the equivalent of approximately $0.111 per Ccf, based upon the 9,514,780 Ccfs. If the load of these industrial companies was excluded, then the fixed transportation costs for remaining customers would increase to approximately $0.132 per Ccf (i.e. a 19% increase). The impact on a typical residential customer using 750 Ccfs annually would be an additional cost of approximately $16 per customer. Similarly, the ACA charge would also have to increase due to the reduced volumes, or the recovery of these ACA costs would have to be extended for a longer period of time.

Q. ARE THERE OTHER REASONS THAT THE LOSS OF INDUSTRIAL LOAD WOULD BE UNDESIRABLE FOR REMAINING CUSTOMERS?

A. Yes. Large industrial customers generally have higher load factors (i.e. use natural gas more evenly throughout the year) than residential and small commercial heating load. As a result, higher load factor customers help to lower the overall costs of the system since they use natural gas service throughout the year and do not contribute to peak demand to the same extent as lower load factor customers. This is particularly true if the local distribution company is subject to balancing penalties from its interstate or intrastate pipeline. The loss of the industrial companies' relatively flat volumes would increase the likelihood of daily imbalances and potentially result in imbalancing fees or other penalties being incurred by SMGC. Such penalties would be passed on to the remaining customers on the SMGC system.[2]

Q. WHAT DID YOU CONCLUDE REGARDING THE OPTION OF DOING NOTHING TO COMPETE WITH ALTERNATIVE FUEL SOURCES?

A. As a result of the considerations discussed above, SMGC concluded that it was not in the best interests of its remaining customers for SMGC to do nothing to attempt to keep the industrial customers on the SMGC system when they approached SMGC with competitive alternative energy sources.

Q. PLEASE DISCUSS THE SECOND OPTION OF LOWERING THE INDUSTRIAL COMPANIES' COMMODITY CHARGES BUT CONTINUING TO TREAT THEM AS FIRM SALES CUSTOMERS.

A. After carefully reviewing the second option, SMGC determined that this option was not viable since the commodity charge could not be reduced enough under the Company's flex tariffs to adequately meet the competition from alternative energy sources. The total PGA rate had increased by $0.2361 per Ccf for a total PGA rate of $0.8989 per Ccf. Under SMGC's Large Volume Service tariffs, SMGC can flex down to a floor of $ .050 per Ccf for these customers. However, this rate floor was

[2] At the time, Williams tariffs did not address daily balancing and related fees. However, Williams had given indications that it would be proposing daily balancing similar to other interstate pipelines.

insufficient to induce these industrial customers to stay on the SMGC system. As a result, a more creative solution needed to be explored.

Q. ISN'T IT TRUE THAT A THIRD-PARTY MARKETER COULD HAVE PROVIDED INTERSTATE TRANSPORATION SERVICES AND GAS SUPPLIES TO THESE INDUSTRIAL CUSTOMERS?

A. Yes. This was the third option that SMGC considered. However, this alternative would have adversely affected SMGC's remaining ratepayers since the fixed transportation costs of the system would have been spread over fewer units of service, as previously discussed. In addition, the industrial customers would not have contributed to paying off the ACA balance that had accrued during the periods that the industrial customers were firm sales customers. In addition, with the lost sales volumes, it would have increased the likelihood of daily imbalances and potentially result in imbalancing fees or other penalties being incurred by SMGC. Under this third option, the negative impact to the remaining ratepayers would have been the same as losing the load completely. This was not a desirable result.

Q. PLEASE DISCUSS THE FOURTH OPTION OF PROVIDING THE INDUSTRIAL COMPANIES WITH TRANSPORTATION SERVICE WITH SMGC ALSO PROVIDING THE GAS SUPPLIES.

A. As I have already explained, the Company also considered the fourth option of providing transportation service with SMGC also providing the gas supplies to these two industrial companies. SMGC is essentially providing service under the company's existing Transportation Service tariffs. The only difference is that SMGC, rather than a third-party marketer, also sold and delivered the gas to the customer at the William's interconnect. Under this option, SMGC provides the transportation service as well as the commodity transported by the industrial customers.

Q. WHAT DID YOU CONCLUDE REGARDING THE FOURTH OPTION OF TREATING THE INDUSTRIAL COMPANIES AS TRANSPORTATION CUSTOMERS WITH SMGC PROVIDING THE GAS SUPPLIES?

A. SMGC determined that the fourth option was in the best interests of both SMGC's remaining ratepayers as well as the Company itself. By treating these two industrial customers as transportation customers with SMGC also providing the gas supplies, the remaining ratepayers benefited. Since the revenues at the Williams' interconnect were more than the cost of the gas, the margin (i.e. profit) was treated as a gas cost recovery for development of the ACA factor. SMGC did not retain any of the revenues from the commodity costs to compensate SMGC for services typically provided by marketing companies. SMGC did continue to receive revenues from the monthly customer service charge and the transportation service rate. In addition, this option reduced the likelihood that daily imbalances would occur and SMGC could potentially be assessed imbalancing fees or penalties. As a result, SMGC concluded that this was the best option to pursue to keep the industrial customers on the SMGC system.

Q. DID SMGC'S OTHER RATEPAYERS BENEFIT BY KEEPING THESE TWO INDUSTRIAL CUSTOMERS ON SMGC'S SYSTEM?

A. Definitely. If these customers had left the system, the remaining ratepayers would have had to absorb the entire remaining uncollected ACA balance from previous periods. Thus, the ACA rate would have had to be either increased, or recovered over a longer period.

Q. HAVE YOU COMPUTED THE AMOUNT OF CONTRIBUTION TO RECOVERY OF THE ACA BALANCE THAT RESULTED FROM SMGC'S DECISION TO OFFER TRANSPORTATION SERVICE WITH SMGC PROVIDING THE GAS SUPPLIES TO THESE CUSTOMERS?

A. Yes. We have computed that $ 39,987 was the amount of the total contribution received from these customers that would have been foregone if SMGC had not offered this transportation service with the gas supplies to these customers. (See Schedule No. 1).

Q. WHAT ADDITIONAL MATTERS RELATED TO THE CALCUATION OF THE DEFERRED CARRYING COST BALANCE THAT NEED TO BE CONSIDERED IN THIS CASE?

A. Yes. The Company takes exception to the Staff's computation of the Deferred Carrying Cost Balance (DCCB) amount. The Company believes the analysis is flawed for two reasons. First, the volumes are based on the inclusion of the two industrial customers' activity. The Company believes this activity should be excluded in the determination of the DCCB computation. Second, the Company contends the methodology used by the Staff in computing the DCCB amount is flawed since it computes a price variance based on the Actual Cost of Gas divided by the gross MMBtu purchases which is compared to the revenue rate (i.e., RPGA factor plus the ACA factor). Thus, no adjustment is considered for the gas Williams retains as a fuel charge and for the conversion to a Ccf basis. Utilizing this approach, the Company computes the DCCB amount to be recovered from customers to be $5,772. (See Schedule No. 2).

Q. ARE THERE ANY FINAL MATTERS THAT SHOULD BE CONSIDERED RELATED TO PREVIOUS ACA CASES?

A. Yes. The Company recently discovered that Gas Supply Realignment Costs paid to Williams Pipeline from May 1996 to September 1998 amounted to $132,946. Of this amount, only $19,434 has previously been included in gas cost in prior ACA audits. The amount of $19,434 was an adjustment proposed by the Staff in the 1997-98 ACA Filing dated July 30, 1999. Thus, the net amount paid to Williams but not collected is $113,512. It should also be noted that Williams Pipeline in FERC Docket Nos. RP99-257, et al. made an Offer of Settlement to resolve all issues related to gas supply realignment (GSR) costs which the FERC approved on August 30, 1999 and became effective on November 1, 1999. As a part of this settlement, the Company received a refund of $62,345.17 in January 2000 which has been refunded to our customers. Thus, the Company refunded monies to its customers that it essentially never collected to begin with. Given these circumstances, the Company requests that it be allowed to recover the amount of $113,512.

Q. DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes it does.

Schedule No. 1

SOUTHERN MISSOURI GAS COMPANY, L.P.

Case No.: GR-2001-388

Transport Customers Having SMGC as Gas Supplier

Month	Revenues	Gas Cost	Margin
September, 2000	0.00	0.00	0.00
October	0.00	0.00	0.00
November	0.00	0.00	0.00
December	0.00	0.00	0.00
January, 2001	0.00	0.00	0.00
February	0.00	0.00	0.00
March	0.00	0.00	0.00
April	54,772.53	48,643.76	6,128.77
May	55,479.23	44,506.24	10,972.99
June	41,063.76	33,539.92	7,523.84
July	38,574.67	31,506.15	7,068.52
August	45,266.45	36,974.05	8,292.40
	235,156.64	195,170.12	39,986.52

Southern Missouri Gas Company, L.P. - Case #GR-2001-495

DCCB Calculation of Interest

				(C)	(D)	(E) = (C) - (D)	(F)	(G) = (E) * (F)	(J)				
Production Month & Year	Purchased MMBTU per invoices w/p IV.A.-3	Ccf Purchases (Net of Fuel)	Actual cost of Gas ($) per w/p IV.A.-1	Actual Annualized Unit Cost of Gas (Ccf)	Estimated Annualized Unit Cost of Gas	Price Variance	Billed Sales Volumes (Ccf)	Monthly DCCB Subject to interest	Cumulative DCCB	10% Threshold	Amount subject to interest	Interest rate: prime less 1%	Interest Due to Company or (Customers)
Large Volume & Large General Service													
Sep-00	28,500	272,330	$ 221,686.42	$ 0.8140	$0.4845	$0.3295	166,390	$54,831.49					
Oct-00	48,887	465,050	$ 327,106.14	$ 0.7034	$0.4845	$0.2189	233,710	$51,154.08					
Nov-00	77,400	733,450	$ 426,775.06	$ 0.5819	$0.6707	($0.0888)	335,290	($29,782.56)					
Dec-00	228,783	2,168,330	$ 1,713,414.21	$ 0.7902	$0.6707	$0.1195	523,850	$62,600.04					
Jan-01	210,162	1,974,360	$ 1,710,664.05	$ 0.8664	$0.6707	$0.1957	517,290	$101,254.23					
Feb-01	130,200	1,230,480	$ 797,509.37	$ 0.6481	$0.9068	($0.2587)	413,760	($107,027.85)					
Mar-01	158,389	1,507,070	$ 851,067.27	$ 0.5647	$0.9068	($0.3421)	382,060	($130,696.43)					
Apr-01	46,459	446,270	$ 347,886.26	$ 0.7795	$0.9068	($0.1273)	146,280	($18,615.28)					
May-01	453	4,330	$ 101,027.46	$ 23.3320	$0.9068	$22.4252	117,000	$2,623,745.70					
Jun-01	28,212	270,170	$ 218,864.99	$ 0.8101	$0.9068	($0.0967)	101,680	($9,832.35)					
Jul-01	13,633	130,280	$ 165,437.93	$ 1.2699	$0.9068	$0.3631	62,360	$22,647.96					
Aug-01	17,333	164,490	$ 175,082.22	$ 1.0644	$0.9068	$0.1576	68,600	$10,810.97					
Total	988,411	9,366,610	$ 7,056,521.38				3,068,290	$2,631,089.89					
General, Residential, and Optional Residential													
Sep-00	28,500	272,330	$ 221,686.42	$ 0.8140	$0.4845	$0.3295	106,850	$35,210.92					
Oct-00	48,887	465,050	$ 327,106.14	$ 0.7034	$0.4845	$0.2189	190,940	$41,792.65					
Nov-00	77,400	733,450	$ 426,775.06	$ 0.5819	$0.4845	$0.0974	385,970	$37,583.22					
Dec-00	228,783	2,168,330	$ 1,713,414.21	$ 0.7902	$0.6707	$0.1195	1,160,740	$138,708.35					
Jan-01	210,162	1,974,360	$ 1,710,664.05	$ 0.8664	$0.6707	$0.1957	1,452,090	$284,231.78					
Feb-01	130,200	1,230,480	$ 797,509.37	$ 0.6481	$0.6707	($0.0226)	1,033,750	($23,333.11)					
Mar-01	158,389	1,507,070	$ 851,067.27	$ 0.5647	$0.9068	($0.3421)	888,620	($303,982.25)					
Apr-01	46,459	446,270	$ 347,886.26	$ 0.7795	$0.9068	($0.1273)	590,550	($75,152.14)					
May-01	453	4,330	$ 101,027.46	$ 23.3320	$0.9068	$22.4252	186,400	$4,180,052.98					
Jun-01	28,212	270,170	$ 218,864.99	$ 0.8101	$0.9068	($0.0967)	140,420	($13,578.47)					
Jul-01	13,633	130,280	$ 165,437.93	$ 1.2699	$0.9068	$0.3631	116,610	$42,336.94					
Aug-01	17,333	164,490	$ 175,082.22	$ 1.0644	$0.9068	$0.1576	103,360	$16,288.95					
Total	988,411	9,366,610	$ 7,056,521.38				6,356,300	$4,360,159.79					

Southern Missouri Gas Company, L.P. - Case #GR-2001-495

DCCB Calculation of Interest

Production Month & Year	Purchased MMBTU per invoices w/p IV.A.-3	Ccf Purchases (Net of Fuel)	Actual cost of Gas ($) per w/p IV.A.-1	(C) Actual Annualized Unit Cost of Gas (Ccf)	(D) Estimated Annualized Unit Cost of Gas	(E) = (C) - (D) Price Variance	(F) Billed Sales Volumes (Ccf)	(G) = (E) * (F) Monthly DCCB Subject to interest	(J) Cumulative DCCB	10% Threshold	Amount subject to interest	Interest rate: prime less 1%	Interest Due to Company or (Customers)
Total Both Charts -- All Customer Classes													
Sep-00	28,500	272,330	$ 221,686.42	$ 0.7778	$0.4845	$0.2933	273,240	$90,042.41	$90,042.41	$321,223.83		8.50%	
Oct-00	48,887	465,050	$ 327,106.14	$ 0.6691	$0.4845	$0.1846	424,650	$92,946.73	$182,989.14	$321,223.83		8.50%	
Nov-00	77,400	733,450	$ 426,775.06	$ 0.5514	$0.6707	($0.1193)	721,260	$7,800.56	$190,789.69	$321,223.83		8.50%	
Dec-00	228,783	2,168,330	$ 1,713,414.21	$ 0.7489	$0.6707	$0.0782	1,684,590	$201,308.38	$392,098.08	$321,223.83	$70,874.24	8.50%	$502.03
Jan-01	210,162	1,974,360	$ 1,710,664.05	$ 0.8140	$0.6707	$0.1433	1,969,380	$385,486.01	$777,584.09	$321,223.83	$456,360.26	8.50%	$3,232.55
Feb-01	130,200	1,230,480	$ 797,509.37	$ 0.6125	$0.9068	($0.2943)	1,447,510	($130,360.96)	$647,223.13	$321,223.83	$325,999.30	7.50%	$2,037.50
Mar-01	158,389	1,507,070	$ 851,067.27	$ 0.5373	$0.9068	($0.3695)	1,270,680	($434,678.68)	$212,544.45	$321,223.83		7.50%	
Apr-01	46,459	446,270	$ 347,886.26	$ 0.7488	$0.9068	($0.1580)	736,830	($93,767.43)	$118,777.02	$321,223.83		7.00%	
May-01	453	4,330	$ 101,027.46	$ 22.3019	$0.9068	$21.3951	303,400	$6,803,798.67	$6,922,575.70	$321,223.83	Exclude	6.50%	
Jun-01	28,212	270,170	$ 218,864.99	$ 0.7758	$0.9068	($0.1310)	242,100	($23,410.83)	$6,899,164.87	$321,223.83	Exclude	6.00%	
Jul-01	13,633	130,280	$ 165,437.93	$ 1.2135	$0.9068	$0.3067	178,990	$64,984.89	$6,964,149.76	$321,223.83	Exclude	5.75%	
Aug-01	17,333	164,490	$ 175,082.22	$ 1.0101	$0.9068	$0.1033	171,960	$27,099.92	$6,991,249.68	$321,223.83	Exclude	5.75%	
Total	988,411	9,366,610	$ 7,056,521.38				9,424,590	$6,991,249.68					$5,772.07

99-00 ACA	$ 3,466,824
98-99 ACA	$ 3,155,635
97-98 ACA	$ 3,014,256
Sum	$9,636,715
Avg	$3,212,238.33
10% of AGL	$321,223.83