



# Western Interconnection Regional Advisory Body

July 25, 2006

Arizona  
California  
Colorado  
Montana  
Idaho  
Nevada  
New Mexico  
Oregon  
Utah  
Washington  
Wyoming

*John Savage*  
Chair

Mr. Richard P. Sergel, President and CEO  
North American Electric Reliability Council  
Princeton Forrestal Village, 116-390 Village Boulevard  
Princeton, New Jersey 08540-5721

*Via Federal Express*

Dear Mr. Sergel:

In accordance with the Federal Energy Regulatory Commission's July 20 Order in Docket RR06-2-000, the Western Interconnection Regional Advisory Body (WIRAB) hereby submits its proposed Calendar Year 2007 budget to the North American Electric Reliability Council. The Commission directed WIRAB to develop a budget and related information and submit it to the Electric Reliability Organization (ERO) to be part of the overall budget process.

In the attached submission, WIRAB has addressed all the instructions in the Commission's July 20 order and attached the information in NERC's budget format. A draft of the WIRAB budget, which remains substantively unchanged, was provided to the Western Electricity Coordinating Council on May 26.

Please advise Doug Larson, Executive Director of the Western Interstate Energy Board ([dlarson@westgov.org](mailto:dlarson@westgov.org); 303.573.8910), if additional information is needed for the Council to convey the proposed WIRAB budget to the FERC.

Sincerely,

A handwritten signature in black ink that reads "John F. Savage".

John Savage, Chairman  
Western Interconnection Regional Advisory Body

cc: Louise McCarren, CEO, Western Electricity Coordinating Council  
Pam Inmann, Executive Director, Western Governors' Association

# **Western Interconnection Regional Advisory Body Proposed Budget for Calendar Year 2007: Submission to the North American Electric Reliability Corporation**

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## **FERC Order**

Pursuant to the order of the Federal Energy Regulatory Commission (FERC) in Docket No. RR06-2-000 issued July 20, 2006 (the “Order”)<sup>1</sup>, the FERC:

- Granted the Western Governors’ petition to establish the Western Interconnection Regional Advisory Body (WIRAB) under Section 215(j) of the Federal Power Act;
- Granted the request that WIRAB receive funding for reasonable costs of its Section 215(j) activities, but defers any further action pending completion of the budget approval process outlined in the order; and
- Directs WIRAB to develop a budget and related information and submit it to the ERO, once certified, for review by the ERO and submission through the ERO budget approval process.

The Order states that funding for Regional Advisory Bodies should be part of the overall funding process for the Electric Reliability Organization (ERO). The Commission instructed WIRAB to develop a budget in a form similar to that specified for regional entities as set forth in Order 672.<sup>2</sup> The July 20 Order specified that the WIRAB

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<sup>1</sup> Order on Petition to Establish a Regional Advisory Body for the Western Interconnection, 116 FERC ¶61,061, Docket No. RR06-2-000, July 20, 2006.

<sup>2</sup> Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Reliability Standards, Order 672, Docket RM05-30-000, Feb. 3, 2006, P. 228. “Each Regional Entity must submit its complete business plan, entire budget and organizational chart to the ERO for it to submit to the Commission. The complete business plan and the entire budget will provide the Commission with necessary information about any non-statutory activities, the source of their funding, and whether the pursuit of such activities presents a conflict of interest for the

should annually develop and submit to the ERO its budget for 215(j) activities and an organization chart that the ERO will then review and submit to the Commission. The WIRAB submission also needs to identify the portion of its costs for 215(j) activities that will be funded from Canada and Mexico, and the basis for this allocation. FERC believes that expenses incurred by a regional advisory body should be recovered from end users within the same region to the extent practicable.

FERC believes that making WIRAB funding a part of the overall ERO budget process provides for stakeholder input. It also provides the ERO and any relevant regional entity with an opportunity to comment on the Regional Advisory Body's proposed budget. The WIRAB will consider any recommendations of the ERO and the Western Interconnection regional entity.

In conformance with FERC's Order of July 20, 2006, the WIRAB submits to the North American Electric Reliability Corporation (NERC) the following Calendar Year 2007 budget. This information is also being provided to the Western Electricity Coordinating Council (WECC).

## **Organizational Overview**

Section 215(j) of the Federal Power Act sets forth the statutory authority for creation of Regional Advisory Bodies.<sup>3</sup> On April 19, 2006, Western Governors with at least one-half of their states' electrical load in the Western Interconnection filed a petition with the FERC to establish WIRAB as the Regional Advisory Body for the Western Interconnection.<sup>4</sup> As noted above, the Commission granted the Governors' petition on July 20, 2006.

The Governors created WIRAB as a standing advisory committee to the Western Interstate Nuclear Board (WINB), which was formed pursuant pursuant to the Western Interstate Nuclear Compact, P.L. 91-461. Members of the WIRAB are appointees of the Governors or their alternates. WIRAB will have the same status under the compact as the

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Regional Entity. For a Cross-Border Regional Entity, this information will also inform the Commission as to what portion of the budget is expended upon activities within the United States."

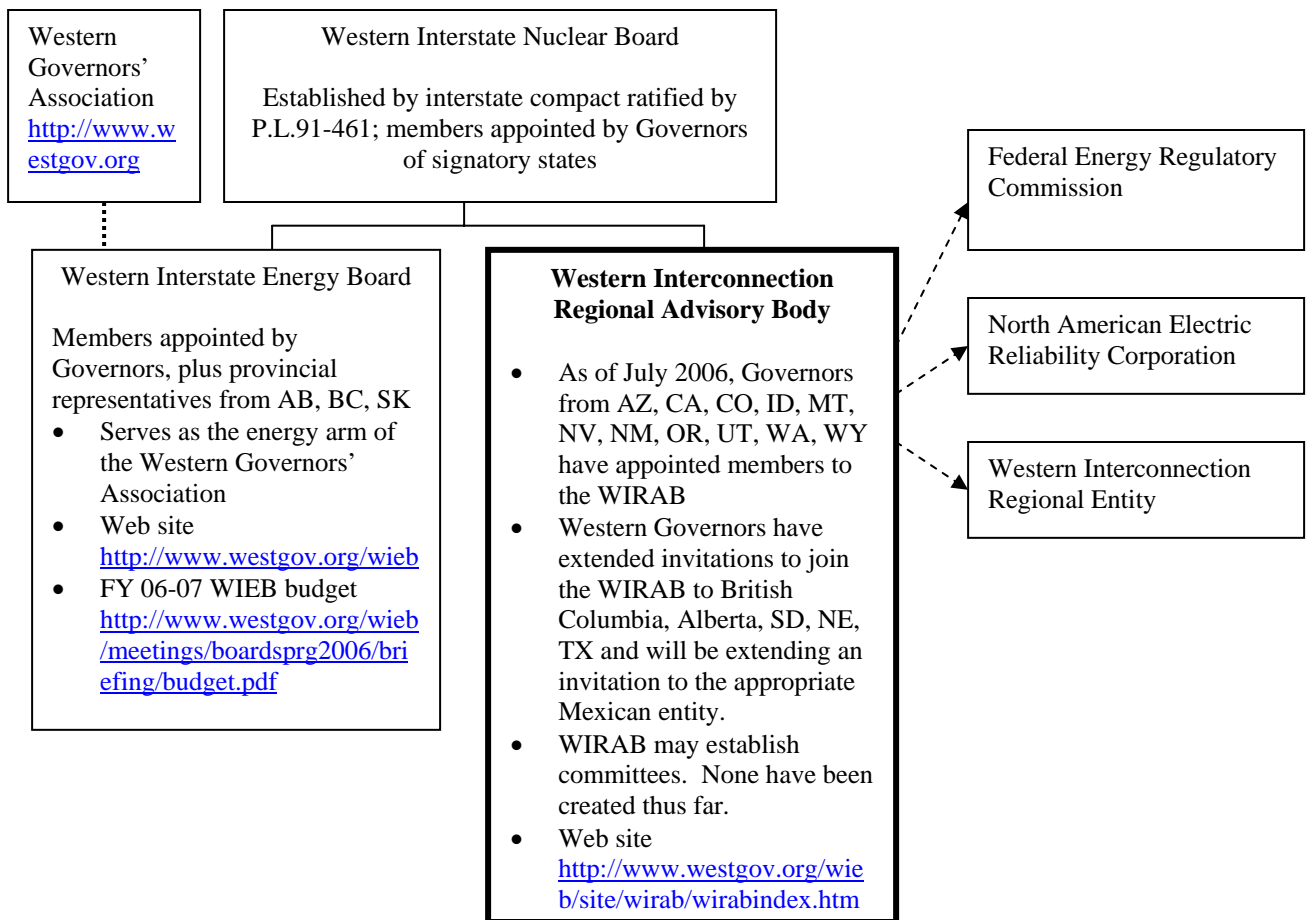
<sup>3</sup>215(j) "Regional Advisory Bodies- The Commission shall establish a regional advisory body on the petition of at least two-thirds of the States within a region that have more than one-half of their electric load served within the region. A regional advisory body shall be composed of one member from each participating State in the region, appointed by the Governor of each State, and may include representatives of agencies, States, and provinces outside the United States. A regional advisory body may provide advice to the Electric Reliability Organization, a regional entity, or the Commission regarding the governance of an existing or proposed regional entity within the same region, whether a standard proposed to apply within the region is just, reasonable, not unduly discriminatory or preferential, and in the public interest, whether fees proposed to be assessed within the region are just, reasonable, not unduly discriminatory or preferential, and in the public interest and any other responsibilities requested by the Commission. The Commission may give deference to the advice of any such regional advisory body if that body is organized on an Interconnection-wide basis."

<sup>4</sup> The Western Governors acted to create WIRAB pursuant to [Resolution 05-29](#) of the Western Governors' Association, dated November 8, 2005.

Western Interstate Energy Board (WIEB), which serves as the energy policy advisory body to the Western Governors Association. WIRAB operates under bylaws of WINB as revised on April 4, 2006. (See Appendix 2).

As of July 20, WIRAB members consisted of Governor appointees from Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming. On July 21, Western Governors extended invitations to join the WIRAB to the states in the Western Interconnection that have less than one-half their electric load in the Western Interconnection (South Dakota, Nebraska and Texas), and the Provinces of Alberta and British Columbia. A similar invitation will be sent to the appropriate Mexican official. (The northern portion of the state of Baja Norte is in the Western Interconnection.) See Appendix 1 for current members of the WIRAB.

### WIRAB Organizational Chart



## WIRAB Proposed Calendar Year 2007 Budget

The budget for WIRAB in Calendar Year 2007 is \$477,260. No expenditures will be made for activities outside of those provided in Section 215(j) of the Federal Power Act. An estimated 15 percent of the budget, or \$71,589, will be funded by entities in Canada and Mexico. This allocation of costs is based on the net energy for load in the U.S., Canadian and Mexican portions of the Western Interconnection, which is the same allocation methodology currently used by the WECC and allowable under FERC's July 20 Order Certifying the North American Electric Reliability Corporation as the ERO.<sup>5</sup>

	Percentage of net energy for load in the Western Interconnection	Share of the CY 2007 WIRAB budget
United States	85%	\$405,671
Canada	14%	66,816
Mexico	1%	4,773
Total	100%	\$477,260

The budget covers the operation of the WIRAB from January 1, 2007 through December 31, 2007. The WIRAB budget year is the same as the NERC and WECC budget year.

**Cost Sharing:** The WIRAB budget reflects only the cost incurred by the WIRAB central staff and travel by WIRAB members and their designees. It does not include the substantial in-kind contribution from participating state and provincial agencies reflected in the salaries of members of the WIRAB, overhead and any support staff for such members. Those costs are borne by the states and provinces. These in-kind contributions are estimated to be \$251,200 in CY 07.<sup>6</sup> In-kind contributions are estimated rather than calculated in order to avoid the cost of imposing a new accounting system on the agencies of WIRAB members that would be necessary to precisely account for in-kind contributions.

<sup>5</sup> Order Certifying the North American Electric Reliability Corporation as the ERO, July 20, 2006, P 168.

<sup>6</sup> The estimate of in-kind state and provincial contributions is based on the following assumptions: Three WIRAB meetings in CY 07 each requiring 8 hours of preparation and follow-up, 8 hours travel and 8 hours of meeting time (16 states/provinces X 3 meetings X 24 hours = 1152 hours.) Eight technical conference call/webinar briefings each requiring 2 hours of preparation and 2 hours of meeting time (16 states/provinces X 8 conferences X 4 hours = 512 hours). One WIRAB member or their designee attending 3 NERC Board meetings and 3 NERC committee meetings assuming 4 hours preparation, 8 hours travel, 12 hours of meeting time (1 person X (3 NERC Board meetings + 3 NERC committee meetings) X 24 hours = 144 hours). An estimated 2 WIRAB members or their designees attending 3 WECC Board meetings and 10 WECC committee/working group meetings assuming 4 hours preparation, 8 hours travel, 12 hours of meeting time (2 people X (3 WECC Board meetings + 10 WECC committee/working group meetings) X 24 hours = 624 hours). Two WIRAB members meeting with FERC two times a year assuming 6 hours preparation, 12 hours travel and 2 hours meeting time (2 people X 2 FERC meetings X 20 hours = 80 hours). Hourly rates, including overhead for state/provincial participants are estimated to be \$100/hour. Thus, the total estimated in-kind contribution is 2512 hours X \$100/hour or \$251,200.

**Budget Assumptions.** The budget reflects that the focus of the WIRAB in CY 07 will be on developing advice to the regional entity (WECC), NERC, and FERC on whether the WECC and NERC budgets and proposed reliability standards are just, reasonable, and in the public interest. These are core Regional Advisory Body functions under Section 215(j). The budget does not reflect developing additional advice in response to requests from FERC for advice on other issues, as authorized in Section 215(j).

**Budget Synopsis.** The budget will support the salaries of 1.5 full-time equivalent employees, and associated overhead, technical consulting services, and travel for the WIRAB staff and WIRAB members, or their designees, to meetings with WECC, NERC and FERC. Overhead includes office expenses, 0.5 FTE support staff and personnel expenses such as medical insurance, retirement plan costs, required taxes (social security, medicare and state unemployment) and the vacation, holiday, and sick leave of each employee. The overhead rate (122 percent) shown in the table below is the same **overhead rate** as used by the Western Interstate Energy Board and **accepted by the Department of Energy**.

Independent technical consulting services are anticipated to be needed in the evaluation of proposed reliability standards. Such services will be procured using procedures similar to those used by the Department of Energy. **All travel will be reimbursed according to Federal Government travel and per diem rules.** Air travel costs are reimbursed based on economy fares.

**All WIRAB expenditures will be annually audited by an independent auditor.** Audit results will be posted on the public WIRAB web site.

The following table presents a summary of the proposed line-item budget for the WIRAB in CY 07. See Appendix 4 for budget presentation in the form NERC prescribed for Regional Entities. No format has been specified for submission of budgets by Regional Advisory Bodies.

Salaries	\$138,000
Meeting Expense	6,000
WIRAB Members Travel	67,200
Staff Travel	19,200
Conference calls and long distance	3,500
Overhead (as accepted by DOE)	<u>168,360</u>
Subtotal	402,260
Technical consultants	<u>75,000</u>
TOTAL	477,260

## **Appendix 1.**

### **Members of the Western Interconnection Regional Advisory Body**

#### **ARIZONA**

**Lori Faeth, Policy Advisor**

Arizona Governor's Office  
1700 W. Washington St.  
Natural Resources & Environment, 8th Floor  
Phoenix, AZ 85007  
Phone 602.542.1334

#### **CALIFORNIA**

**Joe Desmond, Under Secretary for Policy**

California Resources Agency  
770 L Street, Suite 1250  
Sacramento, CA 95814  
Phone 916.322.8673

#### **COLORADO**

**Drew Bolin, Director**

Office of Energy Management & Conservation  
225 E. 16th Avenue, Suite. 650  
Denver, CO 80203  
Phone 303.866.2401

#### **IDAHO**

**Marsha Smith, Commissioner**

Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID 83720  
Phone 208.334.3912

#### **MONTANA**

**Art Compton, Administrator**

Planning, Prevention, and Assistance Division  
Department of Environmental Quality  
1520 East Sixth  
Helena, MT 59620-0901  
Phone 406.444.6754

## **NEVADA**

**Carl Linvill, Director**  
Nevada Office of Energy  
1150 E. Williams Street  
Carson City, NV 89701  
Phone: 775.687.6007

## **NEW MEXICO**

**Joanna Prukop, Cabinet Secretary**  
Energy, Minerals & Natural Resources Dept.  
1220 S. St. Francis  
Santa Fe, NM 87505  
Phone 505.476.3200

## **OREGON – Chair of the WIRAB**

**John Savage, Commissioner**  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97308  
Phone 503.378.6111

## **UTAH**

**Dr. Laura Nelson, Director of Energy**  
Office of the Governor  
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## **WASHINGTON**

**Tony Usibelli, Director**  
Energy Division  
WA Department of Community, Trade & Economic Development  
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**WYOMING**

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State Capitol  
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## Appendix 2:

### WIRAB Bylaws

(Excerpt from the bylaws of the Western Interstate Nuclear Board, as amended on February 21 and April 4, 2006. The complete bylaws can be found at <http://www.westgov.org/wieb/site/boardpage/bylawsAPR06.pdf> )

#### ARTICLE V – Western Interconnection Regional Advisory Body

- A. As provided in Section 215 of the Federal Power Act, the Western Interconnection Regional Advisory Body (WIRAB) is established by the Governors of States that have at least one-half of their electric load in the Western Interconnection through the adoption of Resolution 05-29 of the Western Governors' Association. The WIRAB shall be a standing advisory committee to the Board. The following parties are eligible to appoint a representative to serve on the WIRAB:
  - a. The eligible petitioning States of Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington and Wyoming;
  - b. The Western Interconnection Canadian Provinces of Alberta and British Columbia;
  - c. The State of Baja Norte or an agency of the government of Mexico representing the portion of Mexico in the Western Interconnection; and
  - d. The States of Nebraska, South Dakota and Texas which have less than one-half of their load in the Western Interconnection.
- B. The state and provincial appointees to the Western Interstate Energy Board from the states and provinces listed above shall be the respective state and provincial representatives on the WIRAB. The governor of any non-WIEB member state listed above in V.A.d. may appoint a representative to WIRAB.
- C. A member of the WIRAB may designate an alternate.
- D. Members of the WIRAB shall elect from their membership a Chair and Vice-Chair.
- E. The Chair, with the concurrence of the WIRAB, may appoint committees.
- F. The purpose of the WIRAB is to provide advice to the Electric Reliability Organization, a regional entity (i.e., the Western Electricity Coordinating Council), and the Federal Energy Regulatory Commission regarding the governance of an existing or proposed regional entity within the Western Interconnection, whether a standard proposed to apply within the Western Interconnection is just, reasonable, not unduly discriminatory or preferential, and in the public interest, whether fees proposed to be assessed within the Western Interconnection are just, reasonable, not unduly discriminatory or preferential, and in the public interest, and any other responsibilities requested by the Commission.<sup>7</sup> The WIRAB shall also consult with the U.S.

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<sup>7</sup> Paraphrase of Section 215(j) of the Federal Power Act.

Department of Energy on the designation of national electric transmission lines pursuant to Section 216 of the Federal Power Act.

- G. Official actions of the WIRAB shall be taken only upon the affirmative vote of at least one-half of the members of the WIRAB and those members casting affirmative votes must represent at least one-half of the electric energy consumed among the states and provinces participating in the WIRAB. For WIRAB voting purposes, the amount of electric energy consumed shall be defined as the amount of electricity consumed in that portion of state or province that is located in the Western Interconnection. The amount of electricity consumed shall be derived from official sources and shall be posted on the WIEB website and updated no less often than once a year. WIRAB actions do not require approval of the Board.
- H. The WIRAB shall adopt an annual budget that balances expected revenues and expenditures. As provided in Article I.F., separate financial records for the Western Interconnection Regional Advisory Body shall be maintained. Expenditures shall be subject to an annual audit. Funds for WIRAB shall be for activities authorized under the Federal Power Act.
- I. The WIRAB shall provide advanced public notice and written records of its meetings, including conference calls, on a publicly-accessible Internet web site. All meetings of the WIRAB shall be open to the public, except the WIRAB may meet in closed session: 1) to discuss pending or proposed litigation and to receive confidential attorney-client communications from legal counsel; and 2) to receive and discuss any information that is privileged, trade secret, critical energy infrastructure information (as defined by the Federal Energy Regulatory Commission), protected from public disclosure by law or that WIRAB determines should be confidential in order to protect a legitimate public interest.
- J. The WIRAB shall meet in person at least once a year. It may hold additional meetings via conference call or in person as needed.
- K. The WIRAB shall make reports as necessary to the Governors on its operation and shall alert Western Governors of issues that may warrant the Governors' direct involvement.

### **Appendix 3: WIRAB Accounting and Auditing Procedures**

For accounting purposes, WIRAB will function as a project of the Western Interstate Energy Board (WIEB). All income and direct expenses (labor, travel, meeting costs, conference calls) for WIRAB will be separated from all other WIEB expenses and income. Indirect expenses will be allocated at the same rate as all WIEB indirect expenses. Indirect expenses include office expenses such as rent, office supplies, and personnel expenses such as medical insurance, social security, medicare, retirement, unemployment insurance, workers compensation, and holiday, vacation and sick leave. Indirect expenses are allocated based on direct labor costs.

The Western Interstate Energy Board is audited at the end of each fiscal year (June 30) using generally accepted auditing standards and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States. The audit is conducted by an independent accounting firm and is available on request.

### **Appendix 4: NERC Spreadsheet**

The following table was provided by NERC to Regional Entities. WIRAB has used this format to present the income and expenses in the proposed WIRAB Calendar Year 2007 budget.

Western Interconnection Regional Advisory Body Statement of Activities 2007 Budget				Statutory Total	Reliability Standards	Compliance & Organization Registration & Certification	Reliability Readiness Audit and Improvement	Reliability Assessment & Performance Analysis	Training & Education	Situational Awareness & Infrastructure Security	Committee & Member Forums	General & Admin	Legal and Regulatory	Information & Technology	Accounting & Finance	Non- Statutory Total	Admin Non- Stat	Market Interface Committee	NAESB Dues				
				Total	Statutory Total (Note 1)	Non- Statutory Total														Non- Statutory Total	Admin Non- Stat	Market Interface Committee	NAESB Dues
<b>Funding</b>																							
ERO Funding (Note 1)	477,260	477,260	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Membership Dues	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Testing Fees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Services & Software	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Workshops	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Interest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Miscellaneous	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
<b>Total Funding</b>	<b>477,260</b>	<b>477,260</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
<b>Expenses</b>																							
Average Salary	83,047	83,047	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.00	0.00	0.00			
FTE's	2.0	2.0	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.00	0.00	0.00			
<b>Personnel Expenses</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>			
Salaries	166,094	166,094	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.00	0.00	0.00			
Payroll Taxes	13,371	13,371	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.00	0.00	0.00			
Benefits	37,892	37,892	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	0.00	0.00	0.00			
Retirement Costs	12,457	12,457	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
<b>Total Personnel Expenses</b>	<b>229,814</b>	<b>229,814</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
<b>Meeting Expenses</b>																							
Meetings	6,000	6,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Travel	86,400	86,400	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Conference Calls	3,500	3,500	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
<b>Total Meeting Expenses</b>	<b>95,900</b>	<b>95,900</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
<b>Operating Expenses</b>																							
Contracts & Consultants	75,000	75,000	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Office Rent	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Office Costs (Note 2)	76,546	76,546	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Professional Services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Computer Purchase & Maint.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Furniture & Equipment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
<b>Total Operating Expenses</b>	<b>151,546</b>	<b>151,546</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
<b>Total Expenses</b>	<b>477,260</b>	<b>477,260</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
<b>Change in Assets</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			

NOTE 1: Statutory totals reflect total costs of which an estimated 85% would be paid by entities in the United States. The remaining 15% would be paid by entities in the Canadian and Mexican portions of the Western Interconnection.

Note 2: Office costs include rent, supplies, computer and furniture purchase, etc.