

AVISTA UTILITIES
2019
Washington Electric
Schedule 75
Annual Decoupling Rate Adjustment Filing

ATTACHMENT B

2018 Deferred Revenue Calculation

August 22, 2019

2018 ELECTRIC DECOUPLING DEFERRAL CALCULATIONS

Avista Utilities

Decoupling Mechanism - UE-150204 Base effective 1/11/2016, UE-170485 Base effective 5/1/2018

Development of WA Electric Deferrals (Calendar Year 2018)

Line No.	Source	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	2018 YTD Total	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)		
Residential Group															
1	Actual Customers	Revenue System	215,198	214,197	216,045	214,971	215,099	214,829	215,408	215,648	214,122	218,388	216,943	217,126	2,587,974
2	Monthly Decoupled Revenue per Customer	Attachment 4, Page 3	\$88.32	\$72.17	\$70.97	\$53.46	\$45.89	\$42.55	\$56.44	\$50.95	\$48.24	\$47.13	\$63.98	\$78.40	\$59.88
3	Decoupled Revenue	(1) x (2)	\$ 19,006,882	\$ 15,457,562	\$ 15,333,176	\$ 11,493,299	\$ 9,871,350	\$ 9,140,750	\$ 12,157,547	\$ 10,986,334	\$ 10,328,487	\$ 10,292,002	\$ 13,879,406	\$ 17,023,646	\$ 154,970,442
4	Actual Base Rate Revenue	Revenue System	\$ 25,009,940	\$ 19,040,388	\$ 20,324,943	\$ 15,377,363	\$ 13,472,662	\$ 13,244,401	\$ 16,644,684	\$ 18,480,178	\$ 13,055,161	\$ 14,485,470	\$ 19,035,133	\$ 23,674,422	\$ 211,844,745
5	Actual Basic Charge Revenue	Revenue System	\$ 1,864,093	\$ 1,853,017	\$ 1,875,007	\$ 1,866,672	\$ 1,989,944	\$ 1,999,770	\$ 2,002,580	\$ 2,009,449	\$ 1,975,534	\$ 2,016,999	\$ 1,992,501	\$ 1,993,215	\$ 23,438,778
6	Actual Usage (kWhs)	Revenue System	273,974,209	216,157,403	230,597,488	174,488,139	147,804,377	143,108,258	185,234,475	202,225,615	139,338,822	160,184,148	213,560,314	258,445,038	2,345,118,285
7	Retail Revenue Credit (\$/kWh)	1	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900
8	Variable Power Supply Payments	(6) x (7)	\$ 4,495,917	\$ 3,547,143	\$ 3,784,105	\$ 2,863,350	\$ 2,808,283	\$ 2,719,057	\$ 3,519,455	\$ 3,842,287	\$ 2,647,438	\$ 3,043,499	\$ 4,057,646	\$ 4,910,456	\$ 42,238,635
9	Customer Decoupled Payments	(4) - (5) - (8)	\$ 18,649,930	\$ 13,640,228	\$ 14,665,831	\$ 10,647,340	\$ 8,674,435	\$ 8,525,575	\$ 11,122,649	\$ 12,628,442	\$ 8,432,190	\$ 9,424,972	\$ 12,984,987	\$ 16,770,752	\$ 146,167,332
	Residential Revenue Per Customer Received		\$86.66	\$63.68	\$67.88	\$49.53	\$40.33	\$39.69	\$51.64	\$58.56	\$39.38	\$43.16	\$59.85	\$77.24	\$56.48
10	Deferral - Surcharge (Rebate)	(3) - (9)	\$ 356,952	\$ 1,817,334	\$ 667,345	\$ 845,959	\$ 1,196,916	\$ 615,175	\$ 1,034,898	\$ (1,642,109)	\$ 1,896,297	\$ 867,030	\$ 894,419	\$ 252,894	\$ 8,803,109
11	Deferral - Revenue Related Expenses	Rev Conv Factor	\$ (16,377)	\$ (83,379)	\$ (30,618)	\$ (38,813)	\$ (55,868)	\$ (28,224)	\$ (47,481)	\$ 75,340	\$ (87,002)	\$ (39,779)	\$ (41,036)	\$ (11,603)	\$ (404,841)
	FERC Rate		4.25%	4.25%	4.25%	4.47%	4.47%	4.47%	4.69%	4.69%	4.69%	4.96%	4.96%	4.96%	
12	Interest on Deferral	Avg Balance Calc	\$ 603	\$ 4,279	\$ 8,492	\$ 11,653	\$ 15,324	\$ 18,600	\$ 22,665	\$ 21,621	\$ 22,180	\$ 28,997	\$ 32,590	\$ 34,987	\$ 221,991
	Monthly Residential Deferral Totals		\$ 341,178	\$ 1,738,234	\$ 645,219	\$ 818,799	\$ 1,156,372	\$ 605,551	\$ 1,010,081	\$ (1,545,148)	\$ 1,831,474	\$ 856,247	\$ 885,973	\$ 276,279	\$ 8,620,259
13	Cumulative Residential Deferral Surcharge/(Rebate) Balance	Σ((10) - (12))	\$ 341,178	\$ 2,079,411	\$ 2,724,631	\$ 3,543,429	\$ 4,699,801	\$ 5,305,352	\$ 6,315,433	\$ 4,770,286	\$ 6,601,760	\$ 7,458,007	\$ 8,343,981	\$ 8,620,259	
Non-Residential Group															
14	Actual Customers	Revenue System	36,869	36,446	36,553	36,256	36,545	36,487	36,645	36,730	35,719	37,529	36,614	36,652	439,045
15	Monthly Decoupled Revenue per Customer	Attachment 4, Page 3	\$362.51	\$368.65	\$345.36	\$343.55	\$363.90	\$372.76	\$410.55	\$386.60	\$363.25	\$367.48	\$326.96	\$388.88	\$366.74
16	Decoupled Revenue	(14) x (15)	\$ 13,365,438	\$ 13,435,685	\$ 12,623,975	\$ 12,455,774	\$ 13,298,860	\$ 13,600,901	\$ 15,044,786	\$ 14,199,907	\$ 12,974,904	\$ 13,791,211	\$ 11,971,163	\$ 14,253,088	\$ 161,015,692
17	Actual Base Rate Revenue	Revenue System	\$ 17,231,332	\$ 17,495,591	\$ 16,790,327	\$ 16,164,293	\$ 17,424,969	\$ 17,807,498	\$ 19,859,671	\$ 19,182,146	\$ 17,009,243	\$ 18,403,643	\$ 17,593,113	\$ 17,332,612	\$ 212,294,437
18	Actual Basic Charge Revenue	Revenue System	\$ 1,599,353	\$ 1,583,615	\$ 1,592,066	\$ 1,579,037	\$ 1,651,132	\$ 1,653,529	\$ 1,651,213	\$ 1,662,968	\$ 1,619,989	\$ 1,698,059	\$ 1,643,976	\$ 1,657,605	\$ 19,592,542
19	Actual Usage (kWhs)	Revenue System	175,021,622	177,591,619	168,228,412	162,967,106	175,847,457	180,663,411	205,852,512	194,642,804	169,174,117	183,987,851	175,888,755	171,593,219	2,141,458,885
20	Retail Revenue Credit (\$/kWh)	1	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900
21	Variable Power Supply Payments	(19) x (20)	\$ 2,872,105	\$ 2,914,278	\$ 2,760,628	\$ 2,674,290	\$ 3,341,102	\$ 3,432,605	\$ 3,911,198	\$ 3,698,213	\$ 3,214,308	\$ 3,495,769	\$ 3,341,886	\$ 3,260,271	\$ 38,916,654
22	Customer Decoupled Payments	(17) - (18) - (21)	\$ 12,759,874	\$ 12,997,697	\$ 12,437,633	\$ 11,910,966	\$ 12,432,736	\$ 12,721,364	\$ 14,297,261	\$ 13,820,965	\$ 12,174,945	\$ 13,209,814	\$ 12,607,250	\$ 12,414,736	\$ 153,785,241
	Non-Residential Revenue Per Customer Received		\$346.09	\$356.63	\$340.26	\$328.52	\$340.20	\$348.65	\$390.16	\$376.29	\$340.85	\$351.99	\$344.33	\$338.72	\$350.27
23	Deferral - Surcharge (Rebate)	(16) - (22)	\$ 605,564	\$ 437,987	\$ 186,342	\$ 544,808	\$ 866,124	\$ 879,537	\$ 747,525	\$ 378,943	\$ 799,959	\$ 581,397	\$ (636,087)	\$ 1,838,352	\$ 7,230,451
24	Deferral - Revenue Related Expenses	Rev Conv Factor	\$ (27,783)	\$ (20,095)	\$ (8,549)	\$ (24,996)	\$ (40,428)	\$ (40,353)	\$ (34,296)	\$ (17,386)	\$ (36,702)	\$ (26,674)	\$ 29,184	\$ (84,344)	\$ (332,423)
	FERC Rate		4.25%	4.25%	4.25%	4.47%	4.47%	4.47%	4.69%	4.69%	4.69%	4.96%	4.96%	4.96%	
25	Interest on Deferral	Avg Balance Calc	\$ 1,023	\$ 2,790	\$ 3,855	\$ 5,368	\$ 7,894	\$ 11,024	\$ 14,643	\$ 16,801	\$ 19,065	\$ 22,965	\$ 22,952	\$ 25,418	\$ 153,797
	Monthly Non-Residential Deferral Totals		\$ 578,804	\$ 420,682	\$ 181,647	\$ 525,180	\$ 833,590	\$ 850,208	\$ 727,872	\$ 378,358	\$ 782,322	\$ 577,687	\$ (583,951)	\$ 1,779,426	\$ 7,051,825
26	Cumulative Non-Residential Deferral Surcharge/(Rebate) Balance	Σ((23) - (25))	\$ 578,804	\$ 999,486	\$ 1,181,133	\$ 1,706,313	\$ 2,539,904	\$ 3,390,111	\$ 4,117,983	\$ 4,496,341	\$ 5,278,663	\$ 5,856,351	\$ 5,272,399	\$ 7,051,825	
27	Total Cumulative Electric Deferral	(13) + (26)	\$ 919,982	\$ 3,078,897	\$ 3,905,764	\$ 5,249,743	\$ 7,239,704	\$ 8,695,463	\$ 10,433,417	\$ 9,266,627	\$ 11,880,423	\$ 13,314,358	\$ 13,616,380	\$ 15,672,084	

Docket No. UE-150204 Authorized Decoupling Baseline

Avista Utilities
Electric Decoupling Mechanism
Development of Decoupled Revenue by Rate Schedule - Electric

	TOTAL	RESIDENTIAL SCHEDULE 1	GENERAL SVC. SCH. 11,12	LG. GEN. SVC. SCH. 21,22	PUMPING SCH. 30, 31, 32	EX LG GEN SVC SCHEDULE 25	ST & AREA LTG SCH. 41-48
1 Total Normalized 12 ME Sept 2014 Revenue	\$ 499,982,000	\$ 214,841,000	\$ 71,304,000	\$ 130,152,000	\$ 11,471,000	\$ 65,194,000	\$ 7,020,000
2 Allowed Revenue Increase (Attachment 1)	\$ (8,110,000)	\$ (3,478,000)	\$ (1,159,000)	\$ (2,118,000)	\$ (187,000)	\$ (1,056,000)	\$ (112,000)
3 Total Rate Revenue (January 11, 2016)	\$ 491,872,000	\$ 211,363,000	\$ 70,145,000	\$ 128,034,000	\$ 11,284,000	\$ 64,138,000	\$ 6,908,000
4 Normalized kWhs (12ME Sept 2014 Test Year)	5,653,834,483	2,378,478,031	588,401,236	1,419,228,271	137,227,044	1,105,372,136	25,127,765
5 Retail Revenue Adjustment (line 14)	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01641	\$ 0.01641
6 Variable Power Supply Revenue (L4 * L5)	\$ 92,779,424	\$ 39,030,824	\$ 9,655,664	\$ 23,289,536	\$ 2,251,896	\$ 18,139,157	\$ 412,347
7 Delivery & Power Plant Revenue (L3 - L6)	\$ 346,598,080	\$ 172,332,176	\$ 60,489,336	\$ 104,744,464	\$ 9,032,104		
8 Customer Bills (12ME Sept 2014 Test Year)	2,879,945	2,462,067	364,552	24,110	29,216		
9 Allowed Basic Charges		\$ 8.50	\$ 18.00	\$ 500.00	\$ 18.00		
10 Basic Charge Revenue (Ln 8 * Ln 9)	\$ 40,070,394	\$ 20,927,570	\$ 6,561,936	\$ 12,055,000	\$ 525,888		
11 Decoupled Revenue	\$ 306,527,686	\$ 151,404,606	\$ 53,927,400	\$ 92,689,464	\$ 8,506,216	Excluded From Decoupling	
12 Retail Revenue Adjustment - (Attachment 3)	\$0.01566						
13 Gross Up Factor for Revenue Related Exp	104.81%						
14 Grossed Up Retail Revenue Adjustment	\$0.01641						
		Residential	Non-Residential Group				
15 Average Number of Customers (Line 8 / 12)		205,172	34,823				
16 Annual kWh		2,378,478,031	2,144,856,551				
17 Basic Charge Revenues		20,927,570	19,142,824				
18 Customer Bills		2,462,067	417,878				
19 Average Basic Charge		\$8.50	\$45.81				

Avista Utilities
Electric Decoupling Mechanism
Development of Annual Decoupled Revenue Per Customer - Electric

Line No.	Source	Residential	Non-Residential Schedules*
(a)	(b)	(c)	(d)
1	Decoupled Revenues	Attachment 4, Page 1 \$ 151,404,606	\$ 155,123,080
2	Test Year # of Customers 12 ME 09.2014	Revenue Data	205,172 34,823
3	Decoupled Revenue per Customer	(1) / (2) \$ 737.94	\$ 4,454.59

* Schedules 11, 12, 21, 22, 31, 32.

Attachment 4, Page 2 (UE-150204 Compliance Filing)

Docket No. UE-150204 Authorized Decoupling Baseline

Avista Utilities
Electric Decoupling Mechanism
Development of Monthly Decoupled Revenue Per Customer - Electric

Line No.	Source	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	
1	Electric Sales														
2	<u>Residential</u>														
3	- Weather-Normalized kWh Sales	Monthly Rate Year	284,675,925	232,597,855	228,752,581	172,322,869	166,632,549	148,170,954	153,360,033	181,322,317	146,560,541	174,054,557	212,665,464	277,362,386	2,378,478,031
4	- % of Annual Total	% of Total	11.97%	9.78%	9.62%	7.25%	7.01%	6.23%	6.45%	7.62%	6.16%	7.32%	8.94%	11.66%	100.00%
5	<u>Non-Residential*</u>														
6	- Weather-Normalized kWh Sales	Monthly Rate Year	174,546,983	177,500,854	166,289,029	165,417,455	178,108,889	185,503,197	200,737,081	187,588,012	179,420,897	183,203,251	168,530,619	178,010,284	2,144,856,551
7	- % of Annual Total	% of Total	8.14%	8.28%	7.75%	7.71%	8.30%	8.65%	9.36%	8.75%	8.37%	8.54%	7.86%	8.30%	100.00%
8	Monthly Decoupled Revenue Per Customer ("RPC")														
9	<u>Residential</u>														
10	-UE-150204 Decoupled RPC	Attachment 4, P. 2 L. 3													\$ 737.94
11	- Monthly Decoupled RPC	(4) x (10)	\$ 88.32	\$ 72.17	\$ 70.97	\$ 53.46	\$ 51.70	\$ 45.97	\$ 47.58	\$ 56.26	\$ 45.47	\$ 54.00	\$ 65.98	\$ 86.05	\$ 737.94
12	<u>Non-Residential*</u>														
13	-UE-150204 Decoupled RPC	Attachment 4, P. 2 L. 3													\$ 4,454.59
14	- Monthly Decoupled RPC	(7) x (13)	\$ 362.51	\$ 368.65	\$ 345.36	\$ 343.55	\$ 369.91	\$ 385.27	\$ 416.90	\$ 389.60	\$ 372.63	\$ 380.49	\$ 350.02	\$ 369.70	\$ 4,454.59

* Schedules 11, 12, 21, 22, 31, 32.

Docket No. UE-170485 Authorized Decoupling Baseline

Avista Utilities

Electric Decoupling Mechanism

Development of Decoupled Revenue by Rate Schedule - Electric

Washington Docket No. UE-170485 Compliance Filing

	TOTAL	RESIDENTIAL SCHEDULE 1,2	GENERAL SVC. SCH. 11,12	LG. GEN. SVC. SCH. 21,22	PUMPING SCH. 30, 31, 32	EX LG GEN SVC SCHEDULE 25	ST & AREA LTG SCH. 41-48
1 Total Normalized 12ME Dec 2016 Revenue	\$ 492,134,000	\$ 209,489,000	\$ 73,766,000	\$ 126,766,000	\$ 10,894,000	\$ 64,348,000	\$ 6,871,000
2 Allowed Revenue Increase (Attachment 1)	\$ 10,763,000	\$ 4,904,000	\$ 1,291,000	\$ 2,775,000	\$ 238,000	\$ 1,405,000	\$ 150,000
3 Allowed Base Rate Revenue	\$ 502,897,000	\$ 214,393,000	\$ 75,057,000	\$ 129,541,000	\$ 11,132,000	\$ 65,753,000	\$ 7,021,000
4 Normalized kWhs (12ME Dec 2016 Test Year)	5,658,613,712	2,361,885,989	623,243,883	1,409,459,201	133,495,310	1,107,408,158	23,121,171
5 Retail Revenue Adjustment (line 14)	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900	\$ 0.01900
6 Variable Power Supply Revenue (L4 * L5)	\$ 107,513,661	\$ 44,875,834	\$ 11,841,634	\$ 26,779,725	\$ 2,536,411	\$ 21,040,755	\$ 439,302
7 Delivery & Power Plant Revenue (L3 - L6)	\$ 344,089,397	\$ 169,517,166	\$ 63,215,366	\$ 102,761,275	\$ 8,595,589		
8 Customer Bills (12ME Dec 2016 Test Year)	2,945,836	2,518,371	375,436	22,836	29,193		
9 Allowed Basic Charges	\$ 9.00	\$ 9.00	\$ 20.00	\$ 500.00	\$ 20.00		
10 Basic Charge Revenue (Ln 8 * Ln 9)	\$ 42,175,919	\$ 22,665,339	\$ 7,508,720	\$ 11,418,000	\$ 583,860		
11 Decoupled Revenue	\$ 301,913,478	\$ 146,851,827	\$ 55,706,646	\$ 91,343,275	\$ 8,011,729	Excluded From Decoupling	
12 Retail Revenue Adjustment - (Attachment 3)	\$0.01811						
13 Gross Up Factor for Revenue Related Exp	104.90%						
14 Grossed Up Retail Revenue Adjustment	\$0.01900						
		Residential	Non-Residential Group				
15 Average Number of Customers (Line 8 / 12)		209,864	35,622				
16 Annual kWh		2,361,885,989	2,166,198,394				
17 Basic Charge Revenues		22,665,339	19,510,580				
18 Customer Bills		2,518,371	427,465				
19 Average Basic Charge		\$9.00	\$45.64				

Attachment 4, Page 1 (UE-170485 Compliance Filing)

Avista Utilities
Electric Decoupling Mechanism
Development of Annual Decoupled Revenue Per Customer - Electric
Washington Docket No. UE-170485 Compliance Filing

Line No.	Source	Residential	Non-Residential Schedules*
(a)	(b)	(c)	(d)
1	Decoupled Revenues	Attachment 4, Page 1 \$ 146,851,827	\$ 155,061,651
2	Test Year # of Customers 12 ME 12.2016	Revenue Data 209,864	35,622
3	Decoupled Revenue per Customer	(1) / (2) \$ 699.75	\$ 4,352.96

* Schedules 11, 12, 21, 22, 31, 32.

Attachment 4, Page 2 (UE-170485 Compliance Filing)

Docket No. UE-170485 Authorized Decoupling Baseline

Avista Utilities

Electric Decoupling Mechanism

Development of Monthly Decoupled Revenue Per Customer - Electric
Washington Docket No. UE-170485 Compliance Filing

Line No.	Source	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTAL	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	
1	Electric Sales														
2	<u>Residential</u>														
3	- Weather-Normalized kWh Sales	Monthly Rate Year	282,718,944	229,028,914	209,765,396	176,926,076	154,900,987	143,616,706	190,502,271	171,958,392	162,813,881	159,069,574	215,944,062	264,640,786	2,361,885,989
4	- % of Annual Total	% of Total	11.97%	9.70%	8.88%	7.49%	6.56%	6.08%	8.07%	7.28%	6.89%	6.73%	9.14%	11.20%	100.00%
5	<u>Non-Residential*</u>														
6	- Weather-Normalized kWh Sales	Monthly Rate Year	179,053,129	167,633,774	172,512,516	163,846,532	181,092,306	185,499,649	204,307,747	192,388,070	180,766,696	182,872,741	162,705,681	193,519,554	2,166,198,394
7	- % of Annual Total	% of Total	8.27%	7.74%	7.96%	7.56%	8.36%	8.56%	7.43%	8.88%	8.34%	8.44%	7.51%	8.93%	100.00%
8	Monthly Decoupled Revenue Per Customer ("RPC")														
9	<u>Residential</u>														
10	-UE-170485 Decoupled RPC	Attachment 4, P. 2 L. 3												\$ 699.75	
11	- Monthly Decoupled RPC	(4) x (10)	\$ 83.76	\$ 67.85	\$ 62.15	\$ 52.42	\$ 45.89	\$ 42.55	\$ 56.44	\$ 50.95	\$ 48.24	\$ 47.13	\$ 63.98	\$ 78.40	\$ 699.75
12	<u>Non-Residential*</u>														
13	-UE-170485 Decoupled RPC	Attachment 4, P. 2 L. 3												\$ 4,352.96	
14	- Monthly Decoupled RPC	(7) x (13)	\$ 359.81	\$ 336.86	\$ 346.66	\$ 329.25	\$ 363.90	\$ 372.76	\$ 410.55	\$ 386.60	\$ 363.25	\$ 367.48	\$ 326.96	\$ 388.88	\$ 4,352.96

* Schedules 11, 12, 21, 22, 31, 32.

Attachment 4, Page 3 (UE-170485 Compliance Filing)

**AVISTA UTILITIES
REVENUE CONVERSION FACTOR
WASHINGTON ELECTRIC
TWELVE MONTHS ENDED DECEMBER 31, 2016
With Tax Reform
Washington Docket No. UE-170485 Compliance Filing**

<u>Line No.</u>	<u>Description</u>	<u>Factor</u>
1	Revenues	1.000000
	Expense:	
2	Uncollectibles	0.006183
3	Commission Fees	0.002000
4	Washington Excise Tax	0.038495
5	Total Expense	<u>0.046677</u>
6	Net Operating Income Before FIT	0.953323
7	Federal Income Tax @ 21%	<u>0.200198</u>
8	REVENUE CONVERSION FACTOR	<u><u>0.753125</u></u>

(Per Order No. 6; UE-120436, dated 6/20/2012 - "hard" CF rounded to 6 digits)

Revised Conversion Factor per Bench Request 9, Attachment B Page 4

Attachment 4, Page 4 (UE-170485 Compliance Filing)