2024 Core Transport Agent Program Annual Report

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California Public Utilities Commission

Thanks to:

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Background and Summary

Since 1991, the California Public Utilities Commission (CPUC) has allowed all core customers¹ of the state's regulated natural gas utilities the option to choose a non-utility gas supplier to procure their supply of natural gas.² The program is intended to create competition between regulated and unregulated gas suppliers and to give consumers a choice of providers. The unregulated gas suppliers, known as Core Transport Agents³ or CTAs, procure gas for the residential and small commercial customers known as "core" customers. The gas supplied by CTAs is delivered over the regulated utilities' pipeline systems.

The CPUC does not regulate the rates or fees for gas services supplied by CTAs. Customers who choose to leave the regulated gas utility for CTA gas service are strongly encouraged by the CPUC to carefully review the CTA's terms and conditions and compare those terms and conditions with the gas utility's prior to signing any agreement with the CTA.

In 2013, Senate Bill 656 required the CPUC to regulate certain aspects of CTA services having to do with consumer protections and the resolution of consumer complaints. In 2018, Decision (D.) 18-02-002 established an annual CTA fee (Annual Fee) that was to be based on the cost of administering the CTA program. The decision also required the CPUC's Energy Division staff (staff) to submit a *Core Transport Agent Program Annual Report (CTA Annual Report*) on these costs and to recommend appropriate changes to the Annual Fee reflecting those costs. In 2022, the Commission approved Resolution G-3589, which established a Base Fee of \$3,864 and a Variable Fee that reflected the variable costs resulting from the number and type of complaints received for each CTA.⁴

In the 2023 Core Transport Agent Program Annual Report, staff proposed an increase to the Base Fee from \$3,864 to \$5,000. This proposed increase was driven by an increase in staff salary costs caused by the end of a 10 percent reduction in salaries during the Covid pandemic, other salary increases, and a small reduction in the number of CTAs, due to one CTA being acquired by another. Staff also proposed that the Base Fee remain at \$5,000 in future years unless administrative costs are more than 20 percent higher or lower than that figure. Staff further proposed a change in the methodology for calculating the Variable Fee to more precisely allocate enforcement costs. These proposals were approved by the CPUC in Resolution G-3597.⁵

¹ In this case all core customers does not necessarily include all non-core customers.

² D.91-02-040

³ Also referred to as core aggregation service.

⁴ Resolution G-3589 <u>https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M490/K129/490129633.PDF.</u>

⁵ Resolution G-3597: <u>https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M509/K545/509545115.PDF</u>.

CTA Registration

There are currently 38 CTAs registered with the CPUC.⁶ Energy Division staff are responsible for the registration process. Staff review the CTA's filings for evidence of its operational and technical abilities and financial health. Key CTA personnel are required to pass a background check with the California Department of Justice before a CTA is eligible to complete registration.

In 2023, two new CTAs completed the registration process and are now able to serve customers. One of these CTAs requested to expand their service territory after confirming their registration with the CPUC. Staff are awaiting the additional "Utility Distribution Contracts" with the local utilities that would be providing transportation services. Once those documents are received, the CTA will be approved to serve in the expanded service area. Additionally, staff were informed that one CTA acquired another CTA, but both of these CTAs would renew using separate registries moving forward. Finally, two CTAs requested to deregistered with the CPUC citing, "too high of storage cost rates following the winter 2022 natural gas price spikes." One of these has submitted all of the required material to deregister, while the other has shared its intent to complete this process in May 2024.

CTA Program Administration and Customers Protections

Several groups within the CPUC together administer the CTA program and work to ensure consumer protections. These groups include Energy Division, the Consumer Affairs Branch (CAB), the Utility Enforcement Branch (UEB), and the Fiscal Office. Energy Division is charged with administering the CTA program, registering CTAs, creating, and updating the CTA website, monitoring complaints, responding to consumers and CTA inquiries, providing guidance to CTAs on how to enter and withdraw from the California market, collecting rate information from CTAs to display on the CPUC's website, and conducting analysis on CTA-related issues for decisionmakers.

CAB receives consumers' CTA-related complaints both by phone and in writing. CAB engages with the CTAs to resolve consumers' concerns, which generally center on billing and service issues and deceptive marketing. CAB also creates the Monthly CTA Complaint Report that documents consumer complaints by type. CAB submits the report monthly to the Utility Enforcement Branch and Energy Division.

UEB's work has two parts. First, UEB staff analyze both CAB's Monthly CTA Complaint Report and the complaints it receives from local District Attorney's offices, looking for overall patterns and trends, with a focus on complaints related to unauthorized enrollment. Second, UEB staff pursue citations against individual CTAs who fail to comply with the standard for verifying enrollment or to abide by the California Public Utilities Code or CPUC decisions when the initial screen indicates that such action is warranted.

⁶ List of registered CTAs from the CPUC website: regcta060622.pdf (ca.gov).

The CPUC Fiscal Office records, tracks, and receives the financial resources that the CTAs post to the CPUC. The Fiscal Office also informs Energy Division staff when registered CTAs submit the Annual Fee payment and verifies that the posted amounts are correct and paid on time. If necessary, it will assess late payment fees.

Costs of Administering the CTA Program

Some of the costs incurred to administer and oversee the CTA program are fixed and some vary depending on the number and type of complaints received.

Fixed costs include the cost to Energy Division of administering the program as well as the cost to CAB of compiling the Monthly CTA Complaint Report. These activities and associated costs do not vary materially with the number of CTA-related complaints received.

Costs associated with responding to complaints are variable and depend on the number and type of complaints received. These include CAB costs associated with receiving and attempting to resolve CTA-related consumer complaints and the cost of UEB investigations and enforcement actions.

The purpose of the CTA Annual Fee is to cover the CPUC's costs in administering the CTA program and responding to complaints. Resolution G-3580 divided the Annual Fee into a Base Fee and a Variable Fee. The Base Fee corresponds with fixed costs and is allocated to all CTAs equally. Since not all CTAs contribute equally to complaint-related costs, Resolution G-3580 determined that they should be allocated on a cost-causation basis. Individual CTAs thus incur a Variable Fee based on the number and type of complaints and enforcement actions attributed to them. If a CTA receives no complaints and is not the subject of any enforcement actions, it pays no Variable Fee.

For example, in 2023⁷, four CTAs—SFE Energy Inc., Spark Energy Gas LLC, and United Energy Trading LLC dba Callective Energy—generated 62.73 percent of all complaints. An additional 17 CTAs accounted for the remaining 37.27 percent of the complaints. CAB and UEB received no complaints for the remaining 17 CTAs.

Every year, Energy Division staff calculate the compensation costs for CAB and UEB staff to respond to phone contacts and informal written complaints and to conduct investigations. Because these costs are incremental, it is reasonable to divide them proportionally amongst the CTAs who were the subject of

⁷ The Annual Fee for the current year is based on the median staff salary, complaints, and actions or citations from the prior calendar year. Therefore, the Annual Fee for 2024 is based on what occurred in 2023.

complaints or enforcement actions. This results in a more reasonable and fair allocation of costs that better correlates an individual CTA's Annual Fee with the actual administrative costs associated with that CTA.⁸

2024 Base Fee

The Base Fee reflects the compensation costs for the positions involved in the management and administration of the program. To make the Base Fee more stable over time, compensation costs are calculated using the median⁹ of the salary range for the relevant position plus employee benefit costs during the most recent fiscal year, in this case 2022-2023.¹⁰ The compensation costs are then multiplied by the average amount of time the position is involved in activities required for the CTA program.

For Energy Division, these costs include one permanent full-time Public Utilities Regulatory Analyst (PURA) I and 15 percent of the time of one Program and Project Supervisor (PPS). For CAB, the base cost includes the cost of a PURA I who allocates approximately .80 percent of their time to creating the Monthly CTA Complaint Reports.

The total of these costs is shared equally by each CTA according to the formula below: Base Fee per CTA = Total Fixed Costs ÷ Number of Registered CTAs

For comparison, the fiscal year 2021-2022 Total Fixed Costs were \$178,562.81 shared equally by the 35 CTAs. The fiscal year 2022-2023 Total Fixed Costs used for this report are \$181,194.11 divided evenly amongst the 38 CTAs (see Tables 1 and 2).

CPUC Organizational Area	Position	Median Salary + Benefits	% Time on CTAs	# of CTAs	CTA Cost
Energy Division	PURA II	\$140,614	100%		\$140,614.00
Energy Division	PPS	\$245,486	15%		\$36,822.90
Consumer Affairs Branch	PURA II	\$140,614	0.80%		\$1,124.91
Total Base Cost					\$178,562.81
Base Cost Per CTA				35	\$5,101.77

Table 1: Fixed Costs for Fiscal Year 2021-2022 (2023 CTA Annual Report)

⁸ The Base Fee includes the sum of the fixed costs over the most recent 12-month period July 1 through June 30, in this case fiscal year 2022-2023. The Variable Fee covers the variable costs for the 12-month period January 1 through December 31, 2023, based on the number and type of complaints received and the costs incurred by the CPUC in resolving those complaints and pursuing enforcement actions.

⁹ Median amount is the average of the min and max range of the CALHR pay scale range for each classification.

¹⁰ PURA position compensation costs are based on the median salary plus benefits for the level, I-V, of the analyst assigned to the program.

CPUC Organizational Area	Position	Median Salary + Benefits	% Time on CTAs	# of CTAs	CTA Cost
Energy Division	PURA II	\$142,304.85	100%		\$142,304.85
Energy Division	PPS	\$252,848.67	15%		\$37,927.30
Consumer Affairs Branch	PURA I	\$120,244.92	0.80%		\$961.96
Total Base Cost					\$181,194.11
Base Cost Per CTA				38	\$4,768.26

Table 2: Fixed Costs for Fiscal Year 2022-2023 (2024 CTA Annual Report)

To make the Base Fee more stable year-to-year while still maintaining the flexibility to respond to inflation or changes in personnel costs, in 2023, staff proposed that the Base Fee be set at \$5,000 and remain at that level in future years unless actual administrative costs are 20 percent higher or lower than \$5,000. If staff find that administrative costs are outside the 20 percent tolerance band in the *CTA Annual Report*, staff will submit a resolution to change the fee. Since the fixed costs for 2024 are within 20 percent of \$5,000, there is no change to the Base Fee.

2024 Variable Fee

Variable costs for CTA-related consumer protections reflect the hours CAB and UEB spent responding to consumer complaints and pursuing consumer protection actions in the previous calendar year, in this case 2023. Thus, the Variable Fee has two parts: one for CAB and one for UEB. For CAB, these costs vary by the number and type of complaints received. For UEB they vary by the number of unauthorized enrollment complaints received and the number of UEB actions. For 2023, the combined variable costs for CAB and UEB totaled \$374,045.24 as shown in Table 3 below.

CPUC Organizational Area	CTA Costs
CAB	\$107,277.88
UEB	\$266,767.36
Total Variable Costs	\$374,045.24

Table 3: 2023 Total Variable Costs

Variable Fee: CAB

Consumers typically contact CAB for assistance when they do not receive a resolution from the CTA's customer service department. During 2023, CAB received a total of 1,682 CTA-related complaints and inquiries, significantly more than the 699 complaints addressed in 2022. Of these, 1,152 were received by

phone and 530 were informal written complaints. CAB also received 20 inquiries, which were not included in the Variable Fee. The cost to respond to a complaint varies based on the average time involved. Phone contacts are incoming calls from consumers seeking assistance with a CTA-related issue and require significantly less time to resolve than informal written complaints. Thus, they are less expensive (see Table 4 below). If the consumer is unable to resolve a problem with a CTA after receiving phone assistance, CAB encourages them to submit an informal written complaint. CAB submits informal written complaints to the CTA, which is required to provide a resolution in writing. CAB then informs the consumer of the outcome.

	Complaints by Type	Average Hours per Complaint	Median Cost per Hour	Cost Per Complaint	Total Cost
Phone Contacts	1,152	0.11	\$53.99 ¹¹	\$5.94	\$6,842.88
Informal Written Complaints	530	3.51	\$53.99	\$189.50	\$100,435.00
Total	1,682				\$107,277.88

To calculate CAB costs, staff use the following methodology:

Cost per phone contact¹² multiplied by the CTA's number of phone contacts; plus, Cost per informal written complaint multiplied by the CTA's number of informal written complaints.

For the 2024 fee, the cost per Phone Contact is \$5.94, and the cost per Informal Written Complaint is \$189.50.

Variable Costs: UEB

The second factor in the Variable Fee is the cost of the investigation and citation programs conducted by the Utility Enforcement Branch. UEB staff are responsible for investigating allegations of unauthorized enrollment and identifying trends in complaints pursuant to Resolution UEB-003,¹³ issuing citations, and collecting fines. To calculate total UEB cost, staff use the median salary and benefits for each position

¹¹ Energy Division staff receive CAB's median cost per hour from the Administrative Services Division

¹² CAB maintains statistics concerning the time associated with phone contacts and informal written complaints.

¹³ UEB-003: <u>236850987.PDF (ca.gov).</u>

multiplied by the percentage of time each person spent on CTA-related investigations in the preceding year¹⁴ as shown in Table 5 below.

Position	Median Annual Salary + Benefits	% Time on CTAs	CTA Cost
РМ	\$291,390.15	5%	\$14,569.51
PPS	\$252,848.67	20%	\$50,569.73
PURA V	\$191,956.13	10%	\$19,195.61
PURA IV	\$174,732.67	10%	\$17,473.27
PURA III	\$159,105.71	15%	\$23,865.86
PURA II	\$142,304.85	40%	\$56,921.94
PURA I	\$120,244.92	70%	\$84,171.44
Total			\$266,767.36

Table 5: 2023 Variable Cost: UEB

In the 2021 and 2022 *CTA Annual Reports*, ED staff allocated UEB costs evenly for all complaint types because UEB staff review all CTA-related complaints to identify allegations of unauthorized enrollment and trends in the complaints. In the 2023 report, ED staff proposed two changes to more precisely allocate UEB costs. First, UEB costs are allocated only to those CTAs who were the subject of alleged unauthorized enrollment complaints since that is UEB's focus. Second, staff proposed a method that divides UEB costs between time spent investigating allegations of unauthorized enrollment and time spent pursuing enforcement actions. Both changes were adopted in 2023, and the standard allocation methodology is as follows:

- Disaggregate total UEB costs between alleged unauthorized enrollment investigations and enforcement actions by dividing the number of UEB actions by the number of complaints.
- Multiply the resulting percentage by total UEB costs to determine the amount to allocate towards enforcement.
- Allocate the remainder toward alleged unauthorized enrollment investigation.
- Divide alleged unauthorized enrollment investigation costs equally per unauthorized enrollment complaint.
- Divide enforcement actions costs equally per UEB action.

¹⁴ There are additional CAB variable costs that can only be estimated. These are considered to be less than \$1,000 and are not included in this analysis. Additionally, there are costs associated with the citations generated by the Utility Enforcement Branch that cannot be reliably estimated at this time.

In 2023, UEB staff investigated 298 CTA-related complaints, 286 of which concerned alleged unauthorized enrollment that could be attributed to a particular CTA. Additionally, UEB staff issued six CTA-related citations totaling \$6,000^{15,16} and six cease-and-desist letters or warning notices, which equate to 12 enforcement actions.¹⁷

- 12 enforcement actions / 286 total alleged unauthorized enrollment complaints resulted in 4 percent of costs allocated to enforcement and 96 percent allocated to overall investigations¹⁸
 - » Total enforcement actions: 4% * \$266,767.36 = \$10,670.69
 - » Total alleged unauthorized enrollment investigations: 96% * \$266,767.36 = \$256,096.66
- Enforcement: \$10,670.69 / 12 UEB actions = \$889.22 per action
- Alleged unauthorized enrollment investigations: \$256,096.67/286 complaints = \$895.44 per complaint

For 2024, the cost for alleged unauthorized enrollment investigation is \$895.44 per unauthorized enrollment complaint, and the cost for enforcement is \$889.22 per UEB action.

2024 Annual Fee

In 2023, the Annual Base Fee for the CTA program increased to \$5,000, and it is unchanged for 2024.

The 2024 Variable Fee for CAB-related costs is \$5.94 per Phone Contact and \$189.50 per Informal Written Complaint. The Variable Fee for UEB-related costs is \$895.44 per unauthorized enrollment complaint and \$889.22 per enforcement action. The Variable Fees owed by each CTA are detailed in Appendix A-1 below, which includes the total Annual Fee owed by each CTA. CTAs who receive no complaints do not pay a Variable Fee.

The CPUC Administrative Law Judge Division, Legal Division, and Fiscal Division incurred costs for the CTA program that were not examined for this year but could be included in future years if substantive.

¹⁵ The Fiscal Office collects citation payments and deposits them into the State's General Fund.

¹⁶ [1] A list of CTA citations can be found on the bottom of the UEB Citation website: <u>Energy Citation Programs.</u>

¹⁷ For comparison, in 2022, UEB investigated 728 complaints, 330 of which concerned unauthorized enrollment; issued 125 CTA-related citations for a total of \$125,000; and sent two cease-and-desist and request-for-action letters.

¹⁸ Percentages and total costs are rounded to the nearest whole number.

СТА	Phone Contacts	Informal Complaints	Unauthorized Enrollment Complaints	UEB Actions	Phone Contact Cost	Informal Complaint Cost	UEB Investigation Cost	UEB Action Cost	Variable Fee	Base Fee	Total Fee (Base + Variable)
AAA Natural Gas	73	36	36	1	\$433.62	\$6,822.00	\$32,235.84	\$889.22	\$40,380.68	\$5,000.00	\$45,380.68
Ambit California LLC	9	2	2	0	\$53.46	\$379.00	\$1,790.88	\$0.00	\$2,223.34	\$5,000.00	\$7,223.34
Anahau Energy, LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Anew RNG LLC (FORMERLY Element Markets Renewable Energy LLC)	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Big Tree Energy CA LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Bolt Energy Services LLC	34	22	10	0	\$201.96	\$4,169.00	\$8,954.40	\$0.00	\$13,325.36	\$5,000.00	\$18,325.36
BP Energy Company	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Calpine Energy Solutions LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Clean Energy Renewable Fuels LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00

2024 Annual Fee for Each CTA¹⁹

¹⁹ The CPUC acknowledges that the use of excel may result in rounding errors less than or equal to five dollars.

Commercial Energy of Montana Inc	0	1	0	0	\$0.00	\$189.50	\$0.00	\$0.00	\$189.50	\$5,000.00	\$5,189.50
Constellation NewEnergy - Gas Division LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Direct Energy Business LLC (NOT CURRENTLY SERVING CA)	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
EDF Energy Services LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Everyday Energy LLC (NOT CURRENTLY SERVING CA)	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
GHI Energy LLC	1	0	0	0	\$5.94	\$0.00	\$0.00	\$0.00	\$5.94	\$5,000.00	\$5,005.94
Greenwave Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Interstate Gas Supply Inc	3	0	0	0	\$17.82	\$0.00	\$0.00	\$0.00	\$17.82	\$5,000.00	\$5,017.82
Just Energy Solutions Inc.	6	2	1	0	\$35.64	\$379.00	\$895.44	\$0.00	\$1,310.08	\$5,000.00	\$6,310.08
Mansfield Power and Gas LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Mirabito Natural Gas LLC dba Evergreen Gas & Electric	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00

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National Gas & Electric LLC	18	6	2	1	\$106.92	\$1,137.00	\$1,790.88	\$889.22	\$3,924.02	\$5,000.00	\$8,924.02
North Star Gas Company LLC dba YEP Energy	2	0	0	0	\$11.88	\$0.00	\$0.00	\$0.00	\$11.88	\$5,000.00	\$5,011.88
NRG Business Marketing LLC (ACQUIRED Direct Energy Business Marketing LLC)	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Pacific Summit Energy LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Peak Six Power and Gas LLC	12	7	4	0	\$71.28	\$1,326.50	\$3,581.76	\$0.00	\$4,979.54	\$5,000.00	\$9,979.54
SFE Energy Inc.	183	78	46	1	\$1,087.02	\$14,781.00	\$41,190.24	\$889.22	\$57,947.48	\$5,000.00	\$62,947.48
Shell Energy North America (US) L.P.	0	1	0	0	\$0.00	\$189.50	\$0.00	\$0.00	\$189.50	\$5,000.00	\$5,189.50
Smart One Energy LLC	6	8	3	0	\$35.64	\$1,516.00	\$2,686.32	\$0.00	\$4,237.96	\$5,000.00	\$9,237.96
Spark Energy Gas LLC	158	54	49	5	\$938.52	\$10,233.00	\$43,876.56	\$4,446.10	\$59,494.18	\$5,000.00	\$64,494.18
StateWise Energy California LLC	21	10	5	0	\$124.74	\$1,895.00	\$4,477.20	\$0.00	\$6,496.94	\$5,000.00	\$11,496.94
Symmetry Energy Solutions, LLC	86	60	7	2	\$510.84	\$11,370.00	\$6,268.08	\$1,778.44	\$19,927.36	\$5,000.00	\$24,927.36
Tiger Natural Gas Inc.	110	80	17	1	\$653.40	\$15,160.00	\$15,222.48	\$889.22	\$31,925.10	\$5,000.00	\$36,925.10

CALIFORNIA PUBLIC UTILITIES COMMISSION

Trillium USA Company LLC	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
United Energy Trading LLC dba Callective Energy	287	111	61	1	\$1,704.78	\$21,034.50	\$54,621.84	\$889.22	\$78,250.34	\$5,000.00	\$83,250.34
Viridian Energy PA LLC (NOT CURRENTLY SERVING CA)	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Vista Energy Marketing L.P.	126	44	35	0	\$748.44	\$8,338.00	\$31,340.40	\$0.00	\$40,426.84	\$5,000.00	\$45,426.84
Wave Energy LLC	12	7	8	0	\$71.28	\$1,326.50	\$7,163.52	\$0.00	\$8,561.30	\$5,000.00	\$13,561.30
XOOM Energy California LLC	5	1	0	0	\$29.70	\$189.50	\$0.00	\$0.00	\$219.20	\$5,000.00	\$5,219.20
TOTAL	1152	530	286	12	\$6,842.88	\$100,435.00	\$256,095.84	\$10,670.64	\$374,044.36	\$190,000.00	\$564,044.36