

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
Suite 450  
1750 S Harbor Way  
Portland, OR 97201

June 27, 2023

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: In the Matter of PACIFICORP, dba PACIFIC POWER,  
Application to Implement Provisions of Senate Bill 76.  
**Docket No. UE 219**

Dear Filing Center:

Please find enclosed the Joint Comments of the Alliance of Western Energy Consumers and Oregon Citizens' Utility Board in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UE 219**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	JOINT COMMENTS OF THE
	)	ALLIANCE OF WESTERN ENERGY
Application to Implement the Provisions of	)	CONSUMERS AND OREGON
<u>Senate Bill 76.</u>	)	CITIZENS' UTILITY BOARD

**I. INTRODUCTION**

The Alliance of Western Energy Consumers (“AWEC”) and the Oregon Citizens’ Utility Board (“CUB”) jointly oppose the Klamath River Renewal Corporation’s (“KRRC”) request to disburse accrued interest of \$4,747,365 in the trust accounts that hold PacifiCorp customer contributions to the costs of removing the Klamath Dams.<sup>1</sup> Approval of KRRC’s request would result in an illegal appropriation of customer money and should be rejected. If the Public Utility Commission of Oregon (“Commission”) disagrees with AWEC and CUB’s primary legal arguments, AWEC and CUB respectfully request that the Commission exercise its broad authority and discretion to deny KRRC’s request given the frequency and magnitude of rate increases PacifiCorp’s customers have been exposed to.

**II. BACKGROUND**

PacifiCorp operated four hydroelectric dams, collectively known as the Klamath River Hydroelectric Project (“Project”), pursuant to a FERC license that expired in 2006. While

---

<sup>1</sup> Docket No. UE 219, KRRC Supplement to Dec. 12, 2022 Disbursement Request Under DM #7810225 (June 1, 2023) (“KRRC Request”).

PacifiCorp’s application to relicense the Project was pending, it entered into an agreement in principle with several parties, including the states of Oregon and California, to remove the Project. This agreement in principle was subsequently memorialized as the Klamath Hydroelectric Settlement Agreement (“KHSA”) on February 18, 2010.

In 2009, in anticipation of the agreement to remove the Project, the Oregon Legislature passed Senate Bill (“SB”) 76. Among other things, this law required PacifiCorp to make a filing within 30 days of execution of the KHSA that included two non-bypassable surcharges on its Oregon customers to fund Oregon’s share of the removal of the Projects.<sup>2</sup> The law also makes clear that these surcharges “may not exceed the amounts necessary to fund Oregon’s share of the customer contribution of \$200 million identified in the agreement in principle.”<sup>3</sup> The KHSA further specifies that these “Oregon Klamath Surcharges” must recover 92% of the total \$200 million customer contribution, or “a maximum of approximately \$184,000,000.”<sup>4</sup> The other 8% of the “Customer Contribution” was to be recovered from PacifiCorp’s California customers, and an additional up to \$250 million was to be funded through a California bond.<sup>5</sup> The KHSA makes clear that the “Customer Contribution and the California Bond Funding shall be the total state contribution and shall be referred to together as the ‘State Cost Cap.’”<sup>6</sup>

Under the law, all collections from customers through the surcharges were to be placed in interest-bearing trust accounts.<sup>7</sup> “If any amounts remain in a trust account ... after the

---

<sup>2</sup> ORS 757.736(2).

<sup>3</sup> *Id.* § 757.736(3).

<sup>4</sup> KHSA § 4.1.1.D.

<sup>5</sup> *Id.* §§ 4.1.1.E & 4.1.2.A.

<sup>6</sup> *Id.* § 4.1.3.

<sup>7</sup> ORS 757.738.

trustee makes all payments necessary for the costs of removing the Klamath River dams as described in ORS 757.736(11), the commission shall direct the trustee of the account to refund those amounts to customers or to otherwise use the excess amounts for the benefit of customers.”<sup>8</sup> Further, “[i]f the commission determines at any time that amounts have been collected ... in excess of those needed, or in excess of those allowed, the commission must: (a) Direct the trustee of the appropriate trust account ... to refund these excess amounts to customers or to otherwise use these amounts for the benefit of customers.”<sup>9</sup>

The KHSA explicitly contemplated that interest would be included within the State Cost Cap, not additive to it. Section 7.3.2 sets forth a collection schedule in which \$172 million of the total Customer Contribution (meaning from both Oregon and California) would be collected by December 31, 2019. An additional \$28 million was assumed to be collected through interest, resulting in a total of \$200 million collected from customers in Oregon and California. Appendix H to the KHSA sets forth the anticipated collection schedule and is attached to these comments. The Commission expressly approved the assumptions underlying these collections when it authorized the customer surcharges.<sup>10</sup> It then it adopted Staff’s recommendation to cancel the surcharges effective on November 6, 2019.<sup>11</sup> This cancellation was based on Staff’s (and PacifiCorp’s) assessment “that the full amount to be collected from Oregon ratepayers, \$184 million, should be collected by November 5, 2019.”<sup>12</sup>

---

<sup>8</sup> *Id.* § 757.738(4).

<sup>9</sup> ORS 757.736(9).

<sup>10</sup> *In re PacifiCorp, dba Pacific Power, Application to Implement the Provisions of Senate Bill 76*, OPUC Docket No. UE 219, Order No. 10-364 at 17-18 (Sep. 16, 2010)

<sup>11</sup> Docket No. UE 219, Staff Report (Oct. 30, 2019).

<sup>12</sup> *Id.* at 5.

In 2020, PacifiCorp and various parties, including the State of Oregon and the State of California, entered into a Memorandum of Agreement (“MOA”) to further ensure the removal of the Project. This MOA provides for “additional contingency funding” of \$45 million, with \$15 million each coming from PacifiCorp, Oregon, and California.<sup>13</sup> Section 9 of the MOA, however, is explicit that “the States’ actions described in this [MOA] are contingent upon and subject to receipt of legislative appropriations or other expenditure authority specific to and sufficient to allow the States ... to carry out their obligations described herein.”<sup>14</sup> To AWEC’s and CUB’s knowledge, Oregon never made an appropriation for this additional \$15 million.

KRRC now requests disbursement of approximately \$4.8 million in accrued interest in the trust accounts, even though it acknowledges that it has already received disbursements of the full \$184 million that constitutes Oregon customers’ share of removal costs.<sup>15</sup>

### III. ARGUMENT

KRRC alleges that its request to receive accrued interest in the trust accounts beyond the \$184 million it has already received “is consistent with the requirements of ORS Chapter 757,” but makes no effort to explain how. As detailed above, both Oregon law and the KHSA are explicit that Oregon customers’ share—which includes applicable interest—of the contribution to Project removal “may not exceed” \$184 million.<sup>16</sup> This is the “State Cost Cap” for Oregon,<sup>17</sup> and any amounts in excess of \$184 million “must” be refunded to customers or

---

<sup>13</sup> Docket Nos. UE 219/UP 415, PacifiCorp Application for Approval of a Property Transfer Agreement for the Lower Klamath Project, and Application to Implement the Provisions of Senate Bill 76, Exh. 4 § 7 (Jan. 14, 2021).

<sup>14</sup> *Id.* § 9.

<sup>15</sup> KRRC Request at 1.

<sup>16</sup> ORS 757.736(3); KHSA § 4.1.1.D.

<sup>17</sup> KHSA § 4.1.3.

used for their benefit.<sup>18</sup> There is no room in these clear legal mandates for KRRC’s request, which simply seeks to increase the amount customers pay for Project removal beyond the statutorily defined cap.

Indeed, the cost certainty for customers under SB 76 and the KHSA was material to the Commission’s decision to approve the surcharges as fair, just, and reasonable in the first place. The Commission found that “continued pursuit of the relicensing option would pose significant risks to ratepayers,” whereas approval of the surcharges under SB 76 and the KHSA “caps customer costs and liabilities for Klamath dam removal and the environmental restoration of the Klamath River at a reasonable level ....”<sup>19</sup> Without this cost certainty, which KRRC now seeks to undermine, the Commission may not have made the same decision it did.

Further, the Commission has been clear that total customer contributions plus applicable interest in the account must not exceed \$200 million, of which \$184 million must come from Oregon.<sup>20</sup> As KRRC admits, that threshold has already been met. A core principle of the KHSA negotiations that led to the Commission approving the agreement was an expectation that customers would be protected from uncertain costs.<sup>21</sup> The parties to the KHSA, which included CUB, negotiated the agreement with the understanding that Oregon’s share of liability—that included both customer contributions and applicable interest—would be capped at \$184 million. Since that threshold has been met, enabling the approximately \$4.8 million in interest to be passed to KRRC would run counter to SB 76, KHSA negotiations, and the Commission’s intent in approving the KHSA in its entirety.

---

<sup>18</sup> ORS 757.736(9).

<sup>19</sup> Docket No. UE 219, Order No. 10-364 at 12 (Sept. 16, 2010).

<sup>20</sup> *Id.* at 17.

<sup>21</sup> *Id.* at 8.

Nor can KRRC rely on the MOA as a source of additional funding. The “contingency” funding provided by that agreement was expressly subject to a legislative appropriation of Oregon’s \$15 million share. If SB 76 already contemplated this additional contingency funding, no further appropriation would have been required. The MOA implicitly acknowledges that this additional \$15 million is not authorized by SB 76 and must be funded separately.

In addition, KRRC’s request also comes at a particularly inopportune time for PacifiCorp’s customers, who have faced substantial rate increases recently and which are likely to continue at least into the near future. Beginning this year, customer rates increased by \$138.4 million, or 11.1%, due to increased power costs.<sup>22</sup> This does not include the additional \$52.3 million PacifiCorp is recovering from customers over a four-year period from its 2021 power cost adjustment mechanism (“PCAM”).<sup>23</sup> Customers are facing additional substantial cost increases from PacifiCorp’s current 2024 Transition Adjustment Mechanism (“TAM”) proceeding (UE 420), currently forecasted to be \$163.8 million, or 9.5%, and its 2022 PCAM (UE 421), which is seeking recovery of another \$131.1 million, or 4.0%, if collected over two years as the Company proposes. As evident from last year’s TAM proceeding, this amount may increase substantially as PacifiCorp continues to update its forward price curve. The known amounts do not include an additional approximately \$25 million in coal plant decommissioning costs from PacifiCorp’s 2020 general rate case that have yet to be finally resolved (UM 2183), nor does it include potentially billions of dollars in liability damages from the 2020 Labor Day

---

<sup>22</sup> Docket No. UE 400, PacifiCorp Advice 22-013 at 2 (Nov. 15, 2022).

<sup>23</sup> Docket No. UE 404, Order No. 22-469 at 1 (Dec. 2, 2022).

fires that PacifiCorp recently sought to defer for later recovery from customers (UM 2292).

It is both illegal and inequitable to withhold funds in excess of \$184 million in the Project trust accounts from customers and use them for other purposes. This money rightfully belongs to customers, and it should be returned to customers immediately. The Commission should reject KRRC's request and should direct PacifiCorp to refund the entire remaining amounts in the trust accounts to customers.

#### IV. CONCLUSION

For the foregoing reasons, AWEC and CUB strongly oppose KRRC's request for disbursement of accrued interest in the trust accounts and recommend that the Commission deny KRRC's plainly unlawful request. Instead, the Commission should order these excess amounts to be refunded to customers immediately via a one-time bill credit. The rate spread of the refund should be consistent with the collections from customers under the surcharges.

Dated this 27<sup>th</sup> day of June, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple  
Davison Van Cleve, P.C.  
1750 S Harbor Way, Ste. 450  
Portland, OR 97201  
E-Mail: tcp@dvclaw.com  
Tel: (503) 241-7242  
Attorney for AWEC

/s/ Michael P. Goetz

Michael P. Goetz  
Oregon Citizens' Utility Board  
610 SW Broadway, Suite 400  
Portland, OR 97205  
E-Mail: mike@oregoncub.org  
Tel: (503) 227-1984  
Attorney for CUB



**APPENDIX H**  
**Calculation of Initial Customer Surcharge Target**

APPENDIX H

Monthly Interest Estimator							
Assumptions:							
Green shaded cells drive table assumptions for Annual interest rate and Annual Spend Rate							
After setting assumptions, adjust Total Target Collection to achieve \$200M in cell G137							
		Annual Collection		Total Target Collection			
Annual Surcharge Collected Jan10 - Jun12	\$	17,200		\$	172,000		
Annual Surcharge Collected Jul12 - Dec20	\$	17,200					
Annual Interest Rate		3.50%					
		Monthly Spend		Annual Spend			
Cash Outflow10-12		0.00%		0.00%			
Cash Outflow13-16		0.42%		5.00%			
Cash Outflow17-19		0.83%		10.00%			
Year	Beginning Balance	Cash Inflow	Cash Outflow	Interest Earned	Ending Balance	Collection Check	Interest Check
J-10	\$ -	\$ 1,433	\$ -	\$ 2	\$ 1,435		
F-10	\$ 1,435	\$ 1,433	\$ -	\$ 6	\$ 2,875		
M-10	\$ 2,875	\$ 1,433	\$ -	\$ 10	\$ 4,319		
A-10	\$ 4,319	\$ 1,433	\$ -	\$ 15	\$ 5,767		
M-10	\$ 5,767	\$ 1,433	\$ -	\$ 19	\$ 7,219		
J-10	\$ 7,219	\$ 1,433	\$ -	\$ 23	\$ 8,676		
J-10	\$ 8,676	\$ 1,433	\$ -	\$ 27	\$ 10,136		
A-10	\$ 10,136	\$ 1,433	\$ -	\$ 32	\$ 11,601		
S-10	\$ 11,601	\$ 1,433	\$ -	\$ 36	\$ 13,071		
O-10	\$ 13,071	\$ 1,433	\$ -	\$ 40	\$ 14,544		
N-10	\$ 14,544	\$ 1,433	\$ -	\$ 45	\$ 16,022		
D-10	\$ 16,022	\$ 1,433	\$ -	\$ 49	\$ 17,504	\$ 17,200	\$ 304
J-11	\$ 17,504	\$ 1,433	\$ -	\$ 53	\$ 18,991		
F-11	\$ 18,991	\$ 1,433	\$ -	\$ 57	\$ 20,481		
M-11	\$ 20,481	\$ 1,433	\$ -	\$ 62	\$ 21,977		
A-11	\$ 21,977	\$ 1,433	\$ -	\$ 66	\$ 23,476		
M-11	\$ 23,476	\$ 1,433	\$ -	\$ 71	\$ 24,980		
J-11	\$ 24,980	\$ 1,433	\$ -	\$ 75	\$ 26,488		
J-11	\$ 26,488	\$ 1,433	\$ -	\$ 79	\$ 28,001		
A-11	\$ 28,001	\$ 1,433	\$ -	\$ 84	\$ 29,518		
S-11	\$ 29,518	\$ 1,433	\$ -	\$ 88	\$ 31,040		
O-11	\$ 31,040	\$ 1,433	\$ -	\$ 93	\$ 32,566		
N-11	\$ 32,566	\$ 1,433	\$ -	\$ 97	\$ 34,096		
D-11	\$ 34,096	\$ 1,433	\$ -	\$ 102	\$ 35,631	\$ 17,200	\$ 927
J-12	\$ 35,631	\$ 1,433	\$ -	\$ 106	\$ 37,170		
F-12	\$ 37,170	\$ 1,433	\$ -	\$ 111	\$ 38,714		
M-12	\$ 38,714	\$ 1,433	\$ -	\$ 115	\$ 40,262		
A-12	\$ 40,262	\$ 1,433	\$ -	\$ 120	\$ 41,815		
M-12	\$ 41,815	\$ 1,433	\$ -	\$ 124	\$ 43,373		
J-12	\$ 43,373	\$ 1,433	\$ -	\$ 129	\$ 44,934		
J-12	\$ 44,934	\$ 1,433	\$ 187	\$ 133	\$ 46,313		
A-12	\$ 46,313	\$ 1,433	\$ 193	\$ 137	\$ 47,691		
S-12	\$ 47,691	\$ 1,433	\$ 199	\$ 141	\$ 49,066		
O-12	\$ 49,066	\$ 1,433	\$ 204	\$ 145	\$ 50,440		
N-12	\$ 50,440	\$ 1,433	\$ 210	\$ 149	\$ 51,812		
D-12	\$ 51,812	\$ 1,433	\$ 216	\$ 153	\$ 53,182	\$ 17,200	\$ 1,561
J-13	\$ 53,182	\$ 1,433	\$ 222	\$ 157	\$ 54,551		
F-13	\$ 54,551	\$ 1,433	\$ 227	\$ 161	\$ 55,918		
M-13	\$ 55,918	\$ 1,433	\$ 233	\$ 165	\$ 57,283		
A-13	\$ 57,283	\$ 1,433	\$ 239	\$ 169	\$ 58,647		
M-13	\$ 58,647	\$ 1,433	\$ 244	\$ 173	\$ 60,008		
J-13	\$ 60,008	\$ 1,433	\$ 250	\$ 177	\$ 61,368		
J-13	\$ 61,368	\$ 1,433	\$ 256	\$ 181	\$ 62,727		
A-13	\$ 62,727	\$ 1,433	\$ 261	\$ 185	\$ 64,083		
S-13	\$ 64,083	\$ 1,433	\$ 267	\$ 189	\$ 65,438		
O-13	\$ 65,438	\$ 1,433	\$ 273	\$ 193	\$ 66,792		
N-13	\$ 66,792	\$ 1,433	\$ 278	\$ 196	\$ 68,143		
D-13	\$ 68,143	\$ 1,433	\$ 284	\$ 200	\$ 69,493		
J-14	\$ 69,493	\$ 1,433	\$ 290	\$ 204	\$ 70,841	\$ 17,200	\$ 2,192
F-14	\$ 70,841	\$ 1,433	\$ 295	\$ 208	\$ 72,187		
M-14	\$ 72,187	\$ 1,433	\$ 301	\$ 212	\$ 73,532		
A-14	\$ 73,532	\$ 1,433	\$ 306	\$ 216	\$ 74,875		
M-14	\$ 74,875	\$ 1,433	\$ 312	\$ 220	\$ 76,217		
J-14	\$ 76,217	\$ 1,433	\$ 318	\$ 224	\$ 77,556		
J-14	\$ 77,556	\$ 1,433	\$ 323	\$ 228	\$ 78,894		
A-14	\$ 78,894	\$ 1,433	\$ 329	\$ 232	\$ 80,231		
S-14	\$ 80,231	\$ 1,433	\$ 334	\$ 236	\$ 81,565		
O-14	\$ 81,565	\$ 1,433	\$ 340	\$ 239	\$ 82,898		
N-14	\$ 82,898	\$ 1,433	\$ 345	\$ 243	\$ 84,230		
D-14	\$ 84,230	\$ 1,433	\$ 351	\$ 247	\$ 85,559	\$ 17,200	\$ 2,710
J-15	\$ 85,559	\$ 1,433	\$ 356	\$ 251	\$ 86,887		
F-15	\$ 86,887	\$ 1,433	\$ 362	\$ 255	\$ 88,213		
M-15	\$ 88,213	\$ 1,433	\$ 368	\$ 259	\$ 89,538		
A-15	\$ 89,538	\$ 1,433	\$ 373	\$ 263	\$ 90,861		
M-15	\$ 90,861	\$ 1,433	\$ 379	\$ 267	\$ 92,182		
J-15	\$ 92,182	\$ 1,433	\$ 384	\$ 270	\$ 93,502		
J-15	\$ 93,502	\$ 1,433	\$ 390	\$ 274	\$ 94,820		
A-15	\$ 94,820	\$ 1,433	\$ 395	\$ 278	\$ 96,136		
S-15	\$ 96,136	\$ 1,433	\$ 401	\$ 282	\$ 97,451		
O-15	\$ 97,451	\$ 1,433	\$ 406	\$ 286	\$ 98,764		
N-15	\$ 98,764	\$ 1,433	\$ 412	\$ 290	\$ 100,075		

APPENDIX H

Year	Beginning Balance	Cash Inflow	Cash Outflow	Interest Earned	Ending Balance	Collection Check	Interest Check
D-15	\$ 100,075	\$ 1,433	\$ 417	\$ 293	\$ 101,385		
J-16	\$ 101,385	\$ 1,433	\$ 422	\$ 297	\$ 102,693	\$ 17,200	\$ 3,267
F-16	\$ 102,693	\$ 1,433	\$ 428	\$ 301	\$ 104,000		
M-16	\$ 104,000	\$ 1,433	\$ 433	\$ 305	\$ 105,304		
A-16	\$ 105,304	\$ 1,433	\$ 439	\$ 309	\$ 106,608		
M-16	\$ 106,608	\$ 1,433	\$ 444	\$ 312	\$ 107,909		
J-16	\$ 107,909	\$ 1,433	\$ 450	\$ 316	\$ 109,209		
J-16	\$ 109,209	\$ 1,433	\$ 455	\$ 320	\$ 110,507		
A-16	\$ 110,507	\$ 1,433	\$ 460	\$ 324	\$ 111,804		
S-16	\$ 111,804	\$ 1,433	\$ 466	\$ 328	\$ 113,099		
O-16	\$ 113,099	\$ 1,433	\$ 471	\$ 331	\$ 114,392		
N-16	\$ 114,392	\$ 1,433	\$ 477	\$ 335	\$ 115,684		
D-16	\$ 115,684	\$ 1,433	\$ 482	\$ 339	\$ 116,974	\$ 17,200	\$ 3,816
J-17	\$ 116,974	\$ 1,433	\$ 975	\$ 342	\$ 117,774		
F-17	\$ 117,774	\$ 1,433	\$ 981	\$ 344	\$ 118,570		
M-17	\$ 118,570	\$ 1,433	\$ 988	\$ 346	\$ 119,362		
A-17	\$ 119,362	\$ 1,433	\$ 995	\$ 349	\$ 120,150		
M-17	\$ 120,150	\$ 1,433	\$ 1,001	\$ 351	\$ 120,933		
J-17	\$ 120,933	\$ 1,433	\$ 1,008	\$ 353	\$ 121,712		
J-17	\$ 121,712	\$ 1,433	\$ 1,014	\$ 356	\$ 122,486		
A-17	\$ 122,486	\$ 1,433	\$ 1,021	\$ 358	\$ 123,257		
S-17	\$ 123,257	\$ 1,433	\$ 1,027	\$ 360	\$ 124,023		
O-17	\$ 124,023	\$ 1,433	\$ 1,034	\$ 362	\$ 124,785		
N-17	\$ 124,785	\$ 1,433	\$ 1,040	\$ 365	\$ 125,543		
D-17	\$ 125,543	\$ 1,433	\$ 1,046	\$ 367	\$ 126,297	\$ 17,200	\$ 4,253
J-18	\$ 126,297	\$ 1,433	\$ 1,052	\$ 369	\$ 127,047		
F-18	\$ 127,047	\$ 1,433	\$ 1,059	\$ 371	\$ 127,793		
M-18	\$ 127,793	\$ 1,433	\$ 1,065	\$ 373	\$ 128,534		
A-18	\$ 128,534	\$ 1,433	\$ 1,071	\$ 375	\$ 129,272		
M-18	\$ 129,272	\$ 1,433	\$ 1,077	\$ 378	\$ 130,005		
J-18	\$ 130,005	\$ 1,433	\$ 1,083	\$ 380	\$ 130,735		
J-18	\$ 130,735	\$ 1,433	\$ 1,089	\$ 382	\$ 131,461		
A-18	\$ 131,461	\$ 1,433	\$ 1,096	\$ 384	\$ 132,183		
S-18	\$ 132,183	\$ 1,433	\$ 1,102	\$ 386	\$ 132,900		
O-18	\$ 132,900	\$ 1,433	\$ 1,108	\$ 388	\$ 133,614		
N-18	\$ 133,614	\$ 1,433	\$ 1,113	\$ 390	\$ 134,324		
D-18	\$ 134,324	\$ 1,433	\$ 1,119	\$ 392	\$ 135,031	\$ 17,200	\$ 4,568
J-19	\$ 135,031	\$ 1,433	\$ 1,125	\$ 394	\$ 135,733		
F-19	\$ 135,733	\$ 1,433	\$ 1,131	\$ 396	\$ 136,431		
M-19	\$ 136,431	\$ 1,433	\$ 1,137	\$ 398	\$ 137,126		
A-19	\$ 137,126	\$ 1,433	\$ 1,143	\$ 400	\$ 137,817		
M-19	\$ 137,817	\$ 1,433	\$ 1,148	\$ 402	\$ 138,504		
J-19	\$ 138,504	\$ 1,433	\$ 1,154	\$ 404	\$ 139,188		
J-19	\$ 139,188	\$ 1,433	\$ 1,160	\$ 406	\$ 139,868		
A-19	\$ 139,868	\$ 1,433	\$ 1,166	\$ 408	\$ 140,544		
S-19	\$ 140,544	\$ 1,433	\$ 1,171	\$ 410	\$ 141,216		
O-19	\$ 141,216	\$ 1,433	\$ 1,177	\$ 412	\$ 141,885		
N-19	\$ 141,885	\$ 1,433	\$ 1,182	\$ 414	\$ 142,550		
D-19	\$ 142,550	\$ 1,433	\$ 1,188	\$ 416	\$ 143,212	\$ 17,200	\$ 4,864
<b>Ten-Year Totals</b>		<b>\$ 172,000</b>	<b>\$ 57,203</b>	<b>\$ 28,415</b>		<b>\$200,415</b>	<b>Total Surcharge Fund Collection</b>