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December 16, 2022

NWN OPUC Advice No. 22-24

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, Oregon 97308-1088

Re: February 2023 Bill Adjustments - Schedule 185 Special Annual Interstate and Intrastate Storage and Transportation Credit; and Schedule 186 Special Annual Core Pipeline Capacity Optimization Credit

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following tariff sheets stated to become effective with service on and after February 1, 2023:

Thirteenth Revision of Sheet 185-1	Schedule 185	Special Annual Interstate and Intrastate Storage and Transportation Credit
Thirteenth Revision of Sheet 186-1	Schedule 186	Special Annual Core Pipeline Capacity Optimization Credit

Purpose

The purpose of this filing is to revise Schedule 185 and Schedule 186, respectively, to reflect the per-therm credit used to calculate the lump sum amount to be applied to the bills of commercial customers served under Rate Schedules 3, and under the Sales Service option of Schedules 31 and 32.

Background

Historically, the Schedule 185 and 186 bill credits, or optimization credits, are applied to customer bills in the month of February. For 2023, the lump sum February bill credit will be applied to customer bills for only rate Schedules 3, 31 and 32. Due to the volatile global natural gas market and additional costs, the Company implemented a residential rate mitigation to establish a temporary residential volumetric bill credit to provide relief through the winter heating season (November – mid-March). The rate mitigation deferral will be lower by applying Schedule 2's optimization credits against the deferral. The Company's rate mitigation proposal was docketed in UG 459 and approved in Commission Order No. 22-425.

The bill credits will be calculated based on the customer's actual billed gas usage for the period November 1, 2021 through October 31, 2022. In order to receive the bill credits, a customer must have an active gas service account at the time of the customer's February 2023 billing cycle.

Schedule 185

The Schedule 185 credits represent the credit of the Oregon share of revenues NW Natural received for interstate storage and related transportation service activities under a Limited Jurisdiction Blanket Certificate granted under FERC Regulations, 18 C.F.R. 294.224. The refund of \$3,822,972 (before revenue sensitive effects) is comprised of \$3,753,298 from revenues for November 2021 through October 2022 activity, plus \$69,674 that is the residual remaining balance from the winter 2022 credits.

Schedule 185 amounts are calculated on an equal percentage of margin basis. The Schedule 185 credits will reduce February 2023 customer bills for average customer usage from the November 2021 through October 2022 period indicated as follows:

- The average Schedule 3 Commercial Customer that used about 3,086 therms will see a bill credit of about \$16.51.
- The average Schedule 31 Commercial Firm Sales customer that used about 35,289 therms will see a bill credit of about \$118.49.
- The average Schedule 32 Industrial Firm Sales customer that used about 204,781 therms will see a bill credit of about \$120.20.

Schedule 186

This filing also revises Schedule 186 to add the per-therm credits that will be refunded for the Oregon share of revenues received from the Company's core pipeline capacity optimization activities. The refund of \$19,674,976 (before revenue sensitive effects) is comprised of \$19,316,396 from revenues for November 2021 through October 2022 activity, plus \$358,580 that is the residual remaining balance from the winter 2022 credits.

The Schedule 186 credits applies across all sales-based rate schedules and is a credit of \$0.02822 per therm. The average February 2023 bill credit under Schedule 186 is as follows:

- Schedule 3 Commercial \$87.07
- Schedule 31 Commercial Firm \$995.86
- Schedule 32 Industrial Firm Sales \$5,778.92
Schedule 32 Industrial Interruptible Sales \$18,984.26

Combined Effects

The combined effects of the Schedule 185 and Schedule 186 amounts is a refund to customers of \$23,497,948 (before revenue sensitive effects), which is comprised of \$23,069,694 from revenues for November 1, 2021 through October 31, 2022 activity plus, \$428,254 that is the residual remaining balance from the winter 2022 credits.

The average bill effects of the Schedule 185 and Schedule 186 credits combined for the February time period are as follows:

- The average Schedule 3 Commercial customer will see a bill credit of about \$103.58.
- The average Schedule 31 Commercial Firm Sales customer will see a bill credit of about \$1,114.35.
- The average Schedule 32 Industrial Firm Sales customer will see a bill credit of about \$5,899.12.
- The average Schedule 32 Industrial interruptible Sales customer will see a bill credit of about \$18,984.26.

Conclusion

The Company respectfully requests that the tariff sheets filed herein be approved to become effective with service on and after February 1, 2023.

Copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon and on its website at www.nwnatural.com.

The Company waives paper service in this proceeding.

Please address correspondence on this matter to me with copies to the following:

eFiling
Rates & Regulatory Affairs
NW Natural
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Sincerely,

/s/ Kyle Walker

Kyle Walker, CPA
Manager, Rates and Regulatory Affairs
Phone: (503) 610-7051
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Attachments

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Thirteenth Revision of Sheet 185-1
 Cancels Twelfth Revision of Sheet 185-1

**SCHEDULE 185
 SPECIAL ANNUAL INTERSTATE AND INTRASTATE
 STORAGE AND TRANSPORTATION CREDIT**

PURPOSE:

To credit customers served under the below-listed Rate Schedules for the Oregon share of revenues received by NW Natural for (a) interstate storage and related transportation service provided under a Limited-Jurisdiction Blanket Certificate from FERC granted under FERC Regulations, 18 C.F.R. § 284.224 (hereafter referred to as § 284.224 service), (b) core storage optimization activities; and (c) intrastate storage activities under **Rate Schedule 80** and **Rate Schedule 91**.

APPLICABLE:

The credit under this Schedule shall apply to customer bills issued during the February billing cycle of each calendar year, or such other time period as the Commission may approve. The credit shall apply to the following Sales Service Rate Schedules of this Tariff: **Schedule 3**, and; **Schedules 31** and **32 – Firm Sales** only. (D)

CREDIT: **Effective Billing Cycles: February 2023** (C)

The bill credit to be applied to Customer bills during the effective billing cycle will be calculated by multiplying the following per therm credit by the customer's actual gas usage billed during the period November 1, 2021 through October 31, 2022: (C)

Rate Schedule/Class	Block	Temporary Adjustments		Schedule	Block	Temporary Adjustment	
03 CSF		(\$0.00535)					(R) (D)
03 ISF		(\$0.00393)					
31 CSF	Block 1	(\$0.00365)		31 ISF	Block 1	(\$0.00257)	(R)
	Block 2	(\$0.00334)			Block 2	(\$0.00232)	
32 CSF	Block 1	(\$0.00224)		32 ISF	Block 1	(\$0.00148)	
	Block 2	(\$0.00189)			Block 2	(\$0.00126)	
	Block 3	(\$0.00132)			Block 3	(\$0.00088)	
	Block 4	(\$0.00075)			Block 4	(\$0.00050)	
	Block 5	(\$0.00033)			Block 5	(\$0.00023)	(R)(R)
	Block 6	(\$0.00014)			Block 6	(\$0.00010)	(I) (I)

(continue to Sheet 185-2)

Issued date December 16, 2022
 NWN OPUC Advice No. 22-24

Effective with service on
 and after February 1, 2023

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Thirteenth Revision of Sheet 186-1
Cancels Twelfth Revision of Sheet 186-1

SCHEDULE 186 SPECIAL ANNUAL CORE PIPELINE CAPACITY OPTIMIZATION CREDIT

PURPOSE:

To credit Sales Service Customers served under the below-listed Rate Schedules for the Oregon share of revenues received by NW Natural for the optimization of core customer Pipeline and Storage capacity.

APPLICABLE:

This credit shall apply to customer bills issued during the February billing cycle of each calendar year, or such other time period as the Commission may approve. The credit shall apply to the following Sales Service Rate Schedules of this Tariff:

Rate Schedule 3	Rate Schedule 32 CSF	Rate Schedule 32 CSI	(D)
Rate Schedule 31 ISF	Rate Schedule 32 ISF	Rate Schedule 32 ISI	
Rate Schedule 31 CSF			

CREDIT: **Effective Billing Cycle: February 2023**

The bill credit to be applied to Customer bills during the effective billing cycle will be calculated by multiplying the following per therm credit by the customer's actual gas usage billed during the period November 1, 2021 through October 31, 2022:

(\$0.02822) (C)

SPECIAL CONDITIONS:

1. NW Natural will share with customers served under the Rate Schedules listed above, the amount of net margin revenue that is attributable to optimization of core customer Pipeline and Storage capacity on an 90/10 basis; 10% will be retained by NW Natural, and 90% will be shared with customers through the credit provided for in this Schedule. For this purpose, net margin is defined as revenues less incremental operating and maintenance (O&M) expense.
2. The annual credit shall be based on the net margin as described in paragraph 1 above, and as filed with the Commission. This credit shall be applied to customers' bills, or placed in an interest bearing deferred account, on February 1 of each year, or at a date other than February 1 for reasons and on terms as the Commission may approve.
3. If the net margin for the year is negative (a loss) then the credit will be zero.
4. As provided under "OUT-OF-CYCLE TRANSFERS" provision set forth in Rate Schedules 31 and 32 a Customer that exercises the Capacity Release Option may only be eligible to receive one-half of the above-listed credit.

PRIOR YEAR BALANCES:

The Company will include any remaining balance from the prior year's credit in the calculation of the current year's credit.

GENERAL TERMS:

This Schedule is governed by the terms of this Schedule, the General Rules and Regulations contained in this Tariff, any other Schedules that by their terms or by the terms of this Schedule apply to service under this Schedule, and by all rules and regulations prescribed by regulatory authorities, as amended from time to time.

Issued date December 16, 2022
NWN OPUC Advice No. 22-24

Effective with service on and
after February 1, 2023

EXHIBIT A

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

NW NATURAL SUPPORTING MATERIALS
NWN OPUC Advice No. 22-24 / ADV _____

February 2023 Bill Adjustments
Schedule 185 and Schedule 186

December 16, 2022

NW NATURAL

EXHIBIT A Supporting Materials

NWN OPUC Advice No. 22-16 / ADV _____

February 2023 Bill Adjustments
Schedule 185 and Schedule 186

Title	Page
Oregon Schedule 185 and Schedule 186 Credit for November 2021 – October 2022 Storage Activity – Effects on Average February Bill by Rate Schedule	1
Oregon Schedule 185 and Schedule 186 Credit for November 2021 – October 2022 Storage Activity – Calculation of Increments Allocated on the Equal Percentage of Margin Basis	2
Oregon Schedule 185 and Schedule 186 Credit for November 2021 – October 2022 Storage Activity – Calculation of Increments Allocated on the Equal Cent Per Therm Basis	3
Oregon Schedule 185 and Schedule 186 Credit for November 2021 – October 2022 Storage Activity	4

NW Natural
Rates & Regulatory Affairs
Oregon Schedule 185 and Schedule 186 Credit for November 2021 - October 2022 Storage Activity
Effects on Average February Bill by Rate Schedule

ALL VOLUMES IN THERMS

		Schedule 185		Schedule 186		Combined					
		2022	2022	2022	Proposed	Proposed	Proposed	Proposed	Proposed	Proposed	
		Therms in	Active Customer	Active	Average	Sch. 185	Sch. 185	Sch. 186	Sch. 186	Combined	
		Block	Volumes	Customers	Therms	Rates	Bill Credit	Rates	Bill Credit	Rates	
Schedule	Block	A	B	C	D	E	F = E*D	G	H = G*D	I = E + G	J = I*D
3C Firm Sales		N/A	172,678,203	55,966	3,085.4	(\$0.00535)	(\$16.51)	(\$0.02822)	(\$87.07)	(\$0.03357)	(\$103.58)
3I Firm Sales		N/A	5,145,240	328	15,686.7	(\$0.00393)	(\$61.65)	(\$0.02822)	(\$442.68)	(\$0.03215)	(\$504.33)
27 Dry Out											
31C Firm Sales	Block 1	2,000	11,730,294	640	35,289.3	(\$0.00365)		(\$0.02822)		(\$0.03187)	
	Block 2	all additional	10,854,840			(\$0.00334)		(\$0.02822)		(\$0.03156)	
	Total						(\$118.49)		(\$995.86)		(\$1,114.35)
31C Firm Trans											
31I Firm Sales	Block 1	2,000	3,849,143	189	67,137.8	(\$0.00257)		(\$0.02822)		(\$0.03079)	
	Block 2	all additional	8,839,905			(\$0.00232)		(\$0.02822)		(\$0.03054)	
	Total						(\$156.26)		(\$1,894.63)		(\$2,050.89)
31I Firm Trans											
32C Firm Sales	Block 1	10,000	34,176,895	522	89,166.6	(\$0.00224)		(\$0.02822)		(\$0.03046)	
	Block 2	20,000	10,003,601			(\$0.00189)		(\$0.02822)		(\$0.03011)	
	Block 3	20,000	1,883,292			(\$0.00132)		(\$0.02822)		(\$0.02954)	
	Block 4	100,000	481,155			(\$0.00075)		(\$0.02822)		(\$0.02897)	
	Block 5	600,000	0			(\$0.00033)		(\$0.02822)		(\$0.02855)	
	Block 6	all additional	0			(\$0.00014)		(\$0.02822)		(\$0.02836)	
	Total						(\$115.97)		(\$2,516.28)		(\$2,632.26)
32I Firm Sales	Block 1	10,000	6,629,470	72	204,780.9	(\$0.00148)		(\$0.02822)		(\$0.02970)	
	Block 2	20,000	6,107,407			(\$0.00126)		(\$0.02822)		(\$0.02948)	
	Block 3	20,000	1,630,310			(\$0.00088)		(\$0.02822)		(\$0.02910)	
	Block 4	100,000	377,041			(\$0.00050)		(\$0.02822)		(\$0.02872)	
	Block 5	600,000	0			(\$0.00023)		(\$0.02822)		(\$0.02845)	
	Block 6	all additional	0			(\$0.00010)		(\$0.02822)		(\$0.02832)	
	Total						(\$120.20)		(\$5,778.92)		(\$5,899.12)
32 Firm Trans											
32C Interr Sales	Block 1	10,000	4,698,064	48	515,353.5	\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 2	20,000	6,845,127			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 3	20,000	3,944,410			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 4	100,000	5,999,425			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 5	600,000	3,249,943			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 6	all additional	0			\$0.00000		(\$0.02822)		(\$0.02822)	
	Total						\$0.00		(\$14,543.28)		(\$14,543.28)
32I Interr Sales	Block 1	10,000	5,831,724	61	672,723.5	\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 2	20,000	7,546,825			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 3	20,000	4,711,792			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 4	100,000	12,975,668			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 5	600,000	8,090,940			\$0.00000		(\$0.02822)		(\$0.02822)	
	Block 6	all additional	1,879,187			\$0.00000		(\$0.02822)		(\$0.02822)	
	Total						\$0.00		(\$18,984.26)		(\$18,984.26)
32 Interr Trans											
33											
Totals			717,073,305	677,072							

NW Natural
Rates & Regulatory Affairs
Oregon Schedule 185 and Schedule 186 Credit for November 2021 - October 2022 Storage Activity
Calculation of Increments Allocated on the EQUAL PERCENTAGE OF MARGIN BASIS
ALL VOLUMES IN THERMS

		2022-2023 PGA Rates								2022			Schedule 185 Credits		
		Active Customer	Billing	WACOG &	Temporary	MARGIN	Volumetric	Customer	Active	Total	Proposed Amount:	(\$3,822,972) Temporary Increment			
		Volumes	Rate	Demand Rates*	Increments	Rate	Margin	Charge	Customers	Margin	Revenue Sensitive Multiplier:	2.785% rev sensitive factor is built in			
											Amount to Amortize:	(\$3,932,492) All Sales 2, 3, 31, & 32 Firm Sale			
Schedule	Block	A	B	C	D	E=B-C-D	F = E * A	G	H	I = F + G*H		Multiplier	Allocation to RS	Increment	
												J	K	L	
3C Firm Sales		172,678,203	\$1.18666	\$0.59247	\$0.03780	\$0.55639	\$96,076,425	\$15.00	55,966	\$106,150,305		1.0	(\$924,056)	(\$0.00535)	
3I Firm Sales		5,145,240	\$1.13570	\$0.59247	\$0.10373	\$0.43950	\$2,261,333	\$15.00	328	\$2,320,373		1.0	(\$20,199)	(\$0.00393)	
27 Dry Out															
31C Firm Sales	Block 1	11,730,294	\$0.85127	\$0.50676	\$0.04002	\$0.30449	\$6,589,294	\$325.00	640	\$9,085,294		1.0	(\$79,089)	(\$0.00365)	
	Block 2	10,854,840	\$0.82424	\$0.50676	\$0.03949	\$0.27799						1.0		(\$0.00334)	
31C Firm Trans	Block 1														
	Block 2														
31I Firm Sales	Block 1	3,849,143	\$0.84102	\$0.50676	\$0.10141	\$0.23285	\$2,753,625	\$325.00	189	\$3,490,725		1.0	(\$30,387)	(\$0.00257)	
	Block 2	8,839,905	\$0.81786	\$0.50676	\$0.10099	\$0.21011						1.0		(\$0.00232)	
31I Firm Trans	Block 1														
	Block 2														
32C Firm Sales	Block 1	34,176,895	\$0.76861	\$0.50676	\$0.10105	\$0.16080	\$7,061,139	\$675.00	522	\$11,289,339		1.0	(\$98,276)	(\$0.00224)	
	Block 2	10,003,601	\$0.74322	\$0.50676	\$0.10042	\$0.13604						1.0		(\$0.00189)	
	Block 3	1,883,292	\$0.70109	\$0.50676	\$0.09940	\$0.09493						1.0		(\$0.00132)	
	Block 4	481,155	\$0.65879	\$0.50676	\$0.09836	\$0.05367						1.0		(\$0.00075)	
	Block 5	0	\$0.62840	\$0.50676	\$0.09761	\$0.02403						1.0		(\$0.00033)	
	Block 6	0	\$0.61401	\$0.50676	\$0.09727	\$0.00998						1.0		(\$0.00014)	
32I Firm Sales	Block 1	6,629,470	\$0.73013	\$0.50676	\$0.09833	\$0.12504	\$1,611,724	\$675.00	72	\$2,194,924		1.0	(\$19,107)	(\$0.00148)	
	Block 2	6,107,407	\$0.71078	\$0.50676	\$0.09815	\$0.10587						1.0		(\$0.00126)	
	Block 3	1,630,310	\$0.67847	\$0.50676	\$0.09787	\$0.07384						1.0		(\$0.00088)	
	Block 4	377,041	\$0.64624	\$0.50676	\$0.09757	\$0.04191						1.0		(\$0.00050)	
	Block 5	0	\$0.62372	\$0.50676	\$0.09734	\$0.01962						1.0		(\$0.00023)	
	Block 6	0	\$0.61239	\$0.50676	\$0.09723	\$0.00840						1.0		(\$0.00010)	
32 Firm Trans	Block 1														
	Block 2														
	Block 3														
	Block 4														
	Block 5														
	Block 6														
32C Interr Sales	Block 1														
	Block 2														
	Block 3														
	Block 4														
	Block 5														
	Block 6														
32I Interr Sales	Block 1														
	Block 2														
	Block 3														
	Block 4														
	Block 5														
	Block 6														
32 Interr Trans	Block 1														
	Block 2														
	Block 3														
	Block 4														
	Block 5														
	Block 6														
33															
TOTALS		651,300,200					\$374,117,078		\$676,963	\$451,742,114		\$451,742,114	(\$3,932,491)		

Note: Allocation to rate schedules or blocks with zero volumes is calculated on an overall margin percentage change basis.
 * Since Billing Rates for all schedules above 31 do not include demand, column c for those schedules is WACOG only

NW Natural
Rates & Regulatory Affairs
Oregon Schedule 185 and Schedule 186 Credit for November 2021 - October 2022 Storage Activity
Calculation of Increments Allocated on the EQUAL CENT PER THERM BASIS
ALL VOLUMES IN THERMS

			Schedule 186 Credits			
			Proposed Amount:	(\$19,674,976) Temporary Increment		
			Revenue Sensitive Multiplier:	2.785% add revenue sensitive factor		
			Amount to Amortize:	(\$20,238,622) To All sales		
Schedule	Block	2022 Active Customer Volumes A	Multiplier B	Volumes C	Increment D	
3C Firm Sales		172,678,203	1.0	172,678,203	(\$0.02822)	
3I Firm Sales		5,145,240	1.0	5,145,240	(\$0.02822)	
27 Dry Out						
31C Firm Sales	Block 1	11,730,294	1.0	11,730,294	(\$0.02822)	
	Block 2	10,854,840	1.0	10,854,840	(\$0.02822)	
31C Firm Trans	Block 1					
	Block 2					
31I Firm Sales	Block 1	3,849,143	1.0	3,849,143	(\$0.02822)	
	Block 2	8,839,905	1.0	8,839,905	(\$0.02822)	
31I Firm Trans	Block 1					
	Block 2					
32C Firm Sales	Block 1	34,176,895	1.0	34,176,895	(\$0.02822)	
	Block 2	10,003,601	1.0	10,003,601	(\$0.02822)	
	Block 3	1,883,292	1.0	1,883,292	(\$0.02822)	
	Block 4	481,155	1.0	481,155	(\$0.02822)	
	Block 5	0	1.0	0	(\$0.02822)	
	Block 6	0	1.0	0	(\$0.02822)	
32I Firm Sales	Block 1	6,629,470	1.0	6,629,470	(\$0.02822)	
	Block 2	6,107,407	1.0	6,107,407	(\$0.02822)	
	Block 3	1,630,310	1.0	1,630,310	(\$0.02822)	
	Block 4	377,041	1.0	377,041	(\$0.02822)	
	Block 5	0	1.0	0	(\$0.02822)	
	Block 6	0	1.0	0	(\$0.02822)	
32 Firm Trans	Block 1					
	Block 2					
	Block 3					
	Block 4					
	Block 5					
	Block 6					
32C Interr Sales	Block 1	4,698,064	1.0	4,698,064	(\$0.02822)	
	Block 2	6,845,127	1.0	6,845,127	(\$0.02822)	
	Block 3	3,944,410	1.0	3,944,410	(\$0.02822)	
	Block 4	5,999,425	1.0	5,999,425	(\$0.02822)	
	Block 5	3,249,943	1.0	3,249,943	(\$0.02822)	
	Block 6	0	1.0	0	(\$0.02822)	
32I Interr Sales	Block 1	5,831,724	1.0	5,831,724	(\$0.02822)	
	Block 2	7,546,825	1.0	7,546,825	(\$0.02822)	
	Block 3	4,711,792	1.0	4,711,792	(\$0.02822)	
	Block 4	12,975,668	1.0	12,975,668	(\$0.02822)	
	Block 5	8,090,940	1.0	8,090,940	(\$0.02822)	
	Block 6	1,879,187	1.0	1,879,187	(\$0.02822)	
32 Interr Trans	Block 1					
	Block 2					
	Block 3					
	Block 4					
	Block 5					
	Block 6					
33						
TOTALS		717,073,305		717,073,305	(\$0.02822)	

NW Natural
Rates & Regulatory Affairs
Oregon Schedule 185 and Schedule 186 Credit for November 2021 - October 2022 Storage Activity

Source: [Margin_Sharing_OR_Sch 185_and_186_2022.xlsx](#)

	TOTAL	Schedule 185	Schedule 186
Interstate Storage Services & Optimization 2021-22	(\$23,069,694.00)	(\$3,753,298.00)	(\$19,316,396.00)
Remaining balance from 2021 credit provided in 2022	(\$428,254.48)	(\$69,674.00)	(\$358,580.48)
Total for 2022 filing	(\$23,497,948.48)	(\$3,822,972.00)	(\$19,674,976.48)