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December 4, 2008

**-VIA HAND DELIVERY -**

Ms. Ann Cole  
 Commission Clerk  
 Florida Public Service Commission  
 2540 Shumard Oak Blvd.  
 Tallahassee, FL 32399-0850

**Re: Docket No. 080665-EI**

Dear Ms. Cole:

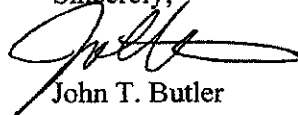
I am enclosing for filing in the above docket the original and five (5) copies of Florida Power & Light Company's ("FPL's") responses to Staff's First Data Request in this docket. Staff has requested that FPL's responses be filed no later than December 5, 2008.

Additionally, per Staff's request at the November 19, 2008 informal meeting, FPL is providing the following information on Lee County Electrical Cooperative's ("LCEC's") large load customers:

Currently LCEC does not have any one customer greater than 5MW of load. There are two industrial customers that are in the 2 to 3 MW range, one on Marco Island and the other in Cape Coral. There are two projects proposed in the future that will each be approximately 5 MW, but both are just entering the planning stage and are several years away.

If there are any questions regarding this transmittal, please contact me at 561-304-5639.

Sincerely,



John T. Butler

COM \_\_\_\_\_  
 ECR \_\_\_\_\_  
 GCL \_\_\_\_\_  
 OPC \_\_\_\_\_  
 RCP \_\_\_\_\_  
 SSC \_\_\_\_\_  
 SGA \_\_\_\_\_  
 ADM \_\_\_\_\_  
 CLK \_\_\_\_\_

Enclosure

cc: Lisa Bennett, Esq., Office of the General Counsel  
 Ms. Connie Kummer, Division of Economic Regulation  
 Joseph McGlothlin, Esq., Office of Public Counsel

an FPL Group company

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**1. Did the need determinations for the WCEC plants include the Lee County load in the forecast?**

The load forecast used in the need determination for the WCEC 1 and 2 units did not include the Lee County Electric Cooperative (LCEC) load. For the need determination of the WCEC 3 unit, the load was part of the FPL forecast. FPL's serving the LCEC load was discussed in the pre-filed direct testimony of Rene Silva and Rosemary Morley in Docket No. 080203-EI (WCEC 3 docket), and was addressed in FPL's 2008 Ten-Year Site Plan filed April 1, 2008.

**2. If so, would both plants have met the need determination without the Lee County load?**

The analyses upon which the need determination was granted for WCEC 1 & 2 did not contain the LCEC load. The analyses upon which the need determination was granted for WCEC 3 did contain the LCEC load and showed that WCEC 3 was solidly cost effective. An analysis without the LCEC load would also show WCEC 3 to be solidly cost-effective.

The proposed in-service date for WCEC 3 of June 2011 was based on the significant economic benefits and emission reductions of this in-service date, which was earlier than an in-service date solely based on the need to meet the 20% reserve margin criteria (June 2013). The earlier in-service date of 2011 also made it possible for FPL to convert the Cape Canaveral and Riviera units which will bring major cost savings to FPL customers and large reductions in air emissions. Removing the relatively small LCEC load in 2011-2013 (approximately 200 MW) from FPL's load forecast would not have made a significant impact on the economic benefits of bringing WCEC 3 in-service in 2011 or on the benefits derived from converting the Cape Canaveral and Riviera units.

**3. Has FPL sought Commission approval of any prior wholesale sale?**

No. FPL has not previously made a large, long-term, discretionary full requirements wholesale sale of this nature.

**4. Why is FPL seeking formal approval of this sale from the Commission?**

The sale represents a large, long-term, discretionary commitment of FPL's resources to serving load outside its own retail service territory. FPL and LCEC agreed that a commitment of this nature should be brought to the attention of the

Commission. Thus a condition precedent of the sale to seek Commission approval was provided for in the Agreement.

**5. What are the assumptions used to project fuel in the model used by FPL to justify the sale?**

The system fuel savings are a function of the system efficiency coupled with fuel price forecast. The attached Table Staff 5-1 includes a summary of the fuel forecast price projections utilized in this analysis for the LCEC sale.

**6. What are the assumptions used to project base rate savings?**

Base rate savings projections include the following costs for existing and new generation resources: Capital Costs, Fixed and Variable O&M Charges, and Capital Replacement Charges. The total annual revenue requirements from all the previously cited categories for both the "with LCEC sale" and "without LCEC sale" scenarios are allocated to the retail jurisdiction based on the FERC-approved 12 CP rate making formula. The inputs and calculations used to project base rate savings are provided in Ex. TWG-2 to the testimony of FPL witness Timothy Gerrish that was submitted with FPL's petition in this docket.

**7. In the meeting you stated that fuel costs will be higher with the sale than without. What is the impact by year on fuel costs of the sale?**

The impact of the LCEC sale on retail fuel costs is shown in the "Fuel Delta" column on page 2 of Ex. TWG-2.

**8. What is the break-even point when the capacity savings outweighs the increased fuel costs?**

The net impact on retail cost responsibility of the increased fuel costs and reduced capacity costs is shown in the "Retail Impact" columns on Ex. TWG-2. The "breakeven point" is best represented by the "Cumulative" retail impact column, which shows that there is a net cumulative benefit starting in 2011 and continuing thereafter. The total nominal net cumulative benefit is shown on Ex. TWG-2 as \$276 million, with an NPV of \$95 million.

**9. The testimony says the contract is consistent with FERC treatment of costs. Please describe that cost treatment and how FERC treatment differs from how such plant would be treated for retail customers.**

The contract is based on FERC formula rates which provide for the recovery of fully allocated costs of FPL production resources. The cost of service formula rates are set forth in APPENDIX B, Generation Demand Charge and Generation Energy Charge Formula Rate, and APPENDIX C, Fuel Charge Factor Formula and Fuel Adjustment Charge Factor Formula included in the testimony of FPL witness Timothy Gerrish. The formula rates were designed primarily to use data on FPL's FERC Form No. 1.

There are several items that are recovered through the generation demand and generation energy charge, Appendix B, for FERC purposes, whereas for FPSC purposes recovery is through various clauses. However, the most significant difference is in the return on production investment. The FERC return is calculated by multiplying the allowed rate of return by the company's average production rate base. Production rate base is calculated as net plant (gross plant in service plus construction work in progress (CWIP) less accumulated depreciation) plus working capital less accumulated deferred income taxes.

Differences between FERC and FPSC

Generation Step-up Transformers

- Production plant (FERC)
- Transmission plant (FPSC)

CWIP in rate base

- 100% of pollution equipment, plus 50% of all other CWIP (FERC)
- Rule 25-6.0141 Allowance for Funds Used During Construction (FPSC)

Working capital amount included in rate base

- Material & Supplies Inventory, plus Prepayments, plus Cash Allowance (1/8 of O&M expenses) (FERC)
- Balance sheet method (FPSC)

**10. How does FPL intend to identify and collect from Lee County any costs approved for recovery from retail ratepayers through the nuclear cost recovery mechanism, both prior to and after implementation of the contract?**

FPL's recovery from LCEC of costs for the Nuclear Uprate and Turkey Point 6 & 7 projects is not dependent upon the specifics of how the retail jurisdictional portion of those costs are recovered from retail customers. As discussed in response to Data Request No. 9 above, the rates charged to LCEC are based on FERC regulatory accounting policies, as they must be. FERC does not have a counterpart to this Commission's nuclear cost recovery mechanism.

LCEC is not buying a share of the nuclear projects; rather it is making a long-term full-requirements purchase of electric service from FPL's electric system as a whole. The Commission's established practice for long-term, system wholesale sales of this type (so-called "separated sales") is to protect retail customers by reducing the jurisdictional separation factors that determine the portion of FPL's electric system for which retail customers have cost responsibility, by the proportion of total system load represented by the wholesale load. That is what FPL proposes to do here with respect to the LCEC load. Retail customers will benefit when and to the extent that FPL serves LCEC load, by paying for a smaller percentage of the nuclear projects – and for the rest of FPL's electric system – than they would without the LCEC agreement.

The economic evaluation of the LCEC agreement that is presented in the pre-filed testimony of Timothy Gerrish assumes that retail customers will pay the retail jurisdictional share of nuclear project costs pursuant to this Commission's nuclear cost recovery mechanism. It does not assume any further, special payments or consideration from LCEC to retail customers. Based on those assumptions and reasonable projections of fuel and other costs, the economic analysis shows that retail customers will benefit from the LCEC Agreement, in that they will pay less for electricity over the life of the Agreement than they would without the Agreement. Thus, there is no need or justification for requiring that LCEC make additional payments to the benefit of retail customers -- payments that would be inconsistent with the terms of the LCEC Agreement and with applicable FERC ratemaking requirements. Attempting to impose a requirement for special payments of this nature would substantially chill the prospects for future wholesale contracts that could benefit retail customers and the state as a whole.

Finally, FPL would note that, to whatever extent retail customers could be said to pay an extra share for the nuclear projects on the front end, it could be said equally that they will receive more of the projects' benefits on the back end. The nuclear projects (especially Turkey Point 6 & 7) are expected to be in service well after the LCEC Agreement terminates. Retail customers will continue to receive the benefits of the projects' low energy costs in those later years, after the project costs have been substantially depreciated, while LCEC will receive no residual benefits once the LCEC Agreement comes to an end.

**11. Has any existing wholesale power sale required investment in plant over what would have been required to serve retail load? If so, please describe.**

In developing its Resource Plan, FPL always plans to meet all of its firm load requirements which include both retail and wholesale load. It is possible that in the past FPL's firm wholesale load requirements have had an impact on the timing of FPL's resource additions. FPL has not isolated the impact, if any, of firm wholesale load on its past Resource Plans.

**12. How does FPL plan to protect retail ratepayers from the cost of plant built solely or primarily to serve wholesale load which would not otherwise reasonably be needed to serve retail load?**

If FPL were to build a generating unit solely to serve a wholesale customer or customers, it would protect retail customers by excluding the costs (and benefits) of that unit in determining retail rates. However, that is not the fact pattern applicable to the LCEC Agreement. As discussed above in response to Data Request No. 10, the LCEC Agreement is for a long-term, full requirements sale from FPL's electric system as a whole. Consistent with prior Commission policy for "separated" wholesale sales such as this, the LCEC Agreement will result in a commensurate reduction in retail jurisdictional separation factors and thus reduce the retail customers' cost responsibility for FPL's overall electric system.

"System sales" to wholesale customers are treated as additional load that FPL's electric system is to serve. FPL designs and builds its system to serve total projected load without distinction between the retail and wholesale components of that load. Retail customers then pay only for the portion of the total system (as defined by the jurisdictional separation factors) required to serve their load. As shown in the economic evaluation discussed in the pre-filed testimony of FPL witness Timothy Gerrish, FPL's retail customers are better off if FPL builds and operates a system that serves the FPL retail load plus the LCEC load, than it would be if FPL designed and built a system that would not serve the LCEC load.

	Coal SCHERER UNIT 4	Coal ST. JOHNS RIVER POWER PARK	Coal ICL	Coal CEDAR BAY
	\$/MMBTU	\$/MMBTU	\$/MMBTU	\$/MMBTU
2008	\$1.94	\$1.50	\$3.07	\$1.86
2009	\$1.91	\$1.57	\$3.07	\$1.88
2010	\$1.87	\$1.58	\$3.05	\$1.86
2011	\$1.91	\$1.61	\$3.09	\$1.89
2012	\$1.96	\$1.65	\$3.14	\$1.92
2013	\$2.00	\$1.69	\$3.18	\$1.95
2014	\$2.03	\$1.74	\$3.22	\$1.99
2015	\$2.31	\$1.77	\$3.27	\$2.04
2016	\$2.35	\$1.81	\$3.35	\$2.09
2017	\$2.38	\$1.85	\$3.44	\$2.15
2018	\$2.42	\$1.90	\$3.53	\$2.21
2019	\$2.47	\$1.95	\$3.63	\$2.28
2020	\$2.51	\$2.01	\$3.73	\$2.35
2021	\$2.55	\$2.05	\$3.82	\$2.41
2022	\$2.59	\$2.10	\$3.92	\$2.47
2023	\$2.63	\$2.15	\$4.01	\$2.52
2024	\$2.67	\$2.19	\$4.11	\$2.57
2025	\$2.71	\$2.24	\$4.28	\$2.63
2026	\$2.76	\$2.28	\$4.38	\$2.67
2027	\$2.80	\$2.32	\$4.49	\$2.71
2028	\$2.85	\$2.35	\$4.61	\$2.75
2029	\$2.89	\$2.40	\$4.73	\$2.80
2030	\$2.94	\$2.44	\$4.85	\$2.85
2031	\$2.99	\$2.49	\$4.98	\$2.90
2032	\$3.05	\$2.54	\$5.11	\$2.96
2033	\$3.10	\$2.59	\$5.24	\$3.02
2034	\$3.16	\$2.64	\$5.39	\$3.08
2035	\$3.21	\$2.70	\$5.53	\$3.14
2036	\$3.27	\$2.76	\$5.67	\$3.21
2037	\$3.33	\$2.82	\$5.82	\$3.28
2038	\$3.39	\$2.89	\$5.98	\$3.36
2039	\$3.46	\$2.95	\$6.14	\$3.44
2040	\$3.52	\$3.02	\$6.31	\$3.52

	Oil - Distillate PORT EVERGLADES	Oil - Distillate LAUDERDALE	Oil - Distillate FT MYERS	Oil - Distillate PUTNAM	Oil - Distillate MARTIN & WCEC
	\$/MMBTU	\$/MMBTU	\$/MMBTU	\$/MMBTU	\$/MMBTU
2008	\$13.84	\$13.84	\$14.34	\$14.52	\$14.48
2009	\$12.62	\$12.62	\$13.13	\$13.31	\$13.27
2010	\$12.54	\$12.54	\$13.04	\$13.22	\$13.19
2011	\$11.11	\$11.11	\$11.61	\$11.79	\$11.76
2012	\$11.74	\$11.74	\$12.25	\$12.43	\$12.39
2013	\$11.90	\$11.90	\$12.40	\$12.58	\$12.54
2014	\$12.02	\$12.02	\$12.52	\$12.70	\$12.67
2015	\$12.55	\$12.55	\$13.05	\$13.23	\$13.19
2016	\$13.30	\$13.30	\$13.81	\$13.99	\$13.95
2017	\$14.10	\$14.10	\$14.60	\$14.78	\$14.75
2018	\$14.89	\$14.89	\$15.39	\$15.57	\$15.54
2019	\$15.72	\$15.72	\$16.22	\$16.40	\$16.37
2020	\$16.54	\$16.54	\$17.04	\$17.22	\$17.19
2021	\$16.99	\$16.99	\$17.49	\$17.67	\$17.64
2022	\$17.45	\$17.45	\$17.96	\$18.14	\$18.10
2023	\$17.93	\$17.93	\$18.43	\$18.61	\$18.58
2024	\$18.42	\$18.42	\$18.93	\$19.11	\$19.07
2025	\$18.95	\$18.95	\$19.45	\$19.63	\$19.59
2026	\$19.46	\$19.46	\$19.96	\$20.14	\$20.11
2027	\$19.98	\$19.98	\$20.49	\$20.67	\$20.63
2028	\$20.52	\$20.52	\$21.03	\$21.21	\$21.17
2029	\$21.08	\$21.08	\$21.59	\$21.77	\$21.73
2030	\$21.65	\$21.65	\$22.16	\$22.34	\$22.30
2031	\$22.24	\$22.24	\$22.75	\$22.93	\$22.89
2032	\$22.85	\$22.85	\$23.35	\$23.53	\$23.50
2033	\$23.47	\$23.47	\$23.98	\$24.16	\$24.12
2034	\$24.11	\$24.11	\$24.62	\$24.80	\$24.76
2035	\$24.77	\$24.77	\$25.27	\$25.45	\$25.42
2036	\$25.45	\$25.45	\$25.95	\$26.13	\$26.10
2037	\$26.15	\$26.15	\$26.65	\$26.83	\$26.79
2038	\$26.86	\$26.86	\$27.36	\$27.54	\$27.51
2039	\$27.59	\$27.59	\$28.10	\$28.28	\$28.24
2040	\$28.34	\$28.34	\$28.85	\$29.03	\$28.99



	Oil - Residual MARTIN 1%	Oil - Residual PORT EVERGLADES 1%	Oil - Residual MANATEE 1%	Oil - Residual TURKEY POINT 1%	Oil - Residual INDIAN RIVER & CANAVERAL 1%	Oil - Residual SANFORD 1%	Oil - Residual RIVIERA 1%
	\$/MMBTU	\$/MMBTU	\$/MMBTU	\$/MMBTU	\$/MMBTU	\$/MMBTU	\$/MMBTU
2008	\$8.66	\$8.66	\$8.66	\$8.67	\$8.66	\$8.93	\$8.66
2009	\$8.22	\$8.22	\$8.22	\$8.23	\$8.22	\$8.49	\$8.22
2010	\$8.13	\$8.13	\$8.13	\$8.14	\$8.13	\$8.40	\$8.13
2011	\$7.91	\$7.91	\$7.91	\$7.92	\$7.91	\$8.18	\$7.91
2012	\$8.36	\$8.36	\$8.36	\$8.37	\$8.36	\$8.63	\$8.36
2013	\$8.30	\$8.30	\$8.30	\$8.31	\$8.31	\$8.57	\$8.30
2014	\$8.24	\$8.24	\$8.25	\$8.26	\$8.25	\$8.52	\$8.24
2015	\$8.59	\$8.59	\$8.59	\$8.61	\$8.60	\$8.86	\$8.59
2016	\$9.22	\$9.22	\$9.22	\$9.23	\$9.23	\$9.49	\$9.22
2017	\$9.85	\$9.85	\$9.86	\$9.87	\$9.86	\$10.13	\$9.85
2018	\$10.51	\$10.51	\$10.51	\$10.53	\$10.52	\$10.78	\$10.51
2019	\$11.19	\$11.19	\$11.19	\$11.20	\$11.19	\$11.46	\$11.19
2020	\$11.87	\$11.87	\$11.87	\$11.88	\$11.87	\$12.14	\$11.87
2021	\$12.21	\$12.21	\$12.21	\$12.23	\$12.22	\$12.48	\$12.21
2022	\$12.57	\$12.57	\$12.57	\$12.58	\$12.57	\$12.84	\$12.57
2023	\$12.93	\$12.93	\$12.94	\$12.95	\$12.94	\$13.21	\$12.93
2024	\$13.31	\$13.31	\$13.31	\$13.32	\$13.32	\$13.58	\$13.31
2025	\$13.72	\$13.72	\$13.72	\$13.73	\$13.72	\$13.99	\$13.72
2026	\$14.11	\$14.11	\$14.11	\$14.12	\$14.12	\$14.38	\$14.11
2027	\$14.51	\$14.51	\$14.52	\$14.53	\$14.52	\$14.79	\$14.51
2028	\$14.93	\$14.93	\$14.93	\$14.94	\$14.93	\$15.20	\$14.93
2029	\$15.36	\$15.36	\$15.36	\$15.37	\$15.36	\$15.63	\$15.36
2030	\$15.80	\$15.80	\$15.80	\$15.81	\$15.81	\$16.07	\$15.80
2031	\$16.26	\$16.25	\$16.26	\$16.27	\$16.26	\$16.53	\$16.26
2032	\$16.73	\$16.72	\$16.73	\$16.74	\$16.73	\$17.00	\$16.73
2033	\$17.21	\$17.21	\$17.21	\$17.22	\$17.21	\$17.48	\$17.21
2034	\$17.70	\$17.70	\$17.71	\$17.72	\$17.71	\$17.98	\$17.70
2035	\$18.21	\$18.21	\$18.21	\$18.23	\$18.22	\$18.49	\$18.21
2036	\$18.74	\$18.74	\$18.74	\$18.76	\$18.75	\$19.01	\$18.74
2037	\$19.28	\$19.28	\$19.29	\$19.30	\$19.29	\$19.56	\$19.28
2038	\$19.84	\$19.84	\$19.84	\$19.85	\$19.84	\$20.11	\$19.84
2039	\$20.41	\$20.41	\$20.41	\$20.42	\$20.42	\$20.68	\$20.41
2040	\$21.00	\$21.00	\$21.00	\$21.01	\$21.00	\$21.27	\$21.00

	Natural Gas ZONE 1 FGT FIRM \$/MMBTU	Natural Gas ZONE 2 FGT FIRM \$/MMBTU	Natural Gas ZONE 3 FGT FIRM \$/MMBTU	Natural Gas ZONE 3 MOBILE BAY/DESTIN FGT FIRM \$/MMBTU	Natural Gas FGT NON- FIRM \$/MMBTU	Natural Gas GULFSTREAM FIRM \$/MMBTU	Natural Gas GULFSTREAM NON-FIRM \$/MMBTU	Natural Gas GULFSTREAM NON-FIRM BACKHAUL \$/MMBTU
2008	\$8.23	\$8.33	\$8.54	\$8.57	\$8.91	\$8.40	\$9.00	\$9.39
2009	\$7.07	\$7.16	\$7.37	\$7.38	\$7.72	\$7.23	\$8.64	\$9.03
2010	\$6.53	\$6.63	\$6.86	\$6.87	\$7.21	\$6.73	\$8.38	\$8.77
2011	\$5.91	\$6.00	\$6.25	\$6.25	\$6.60	\$6.12	\$8.11	\$8.51
2012	\$6.18	\$6.27	\$6.49	\$6.49	\$6.84	\$6.36	\$7.80	\$8.19
2013	\$6.36	\$6.45	\$6.67	\$6.67	\$7.01	\$6.53	\$7.55	\$7.94
2014	\$6.53	\$6.63	\$6.83	\$6.83	\$7.17	\$6.69	\$7.33	\$7.72
2015	\$6.86	\$6.96	\$7.16	\$7.17	\$7.51	\$7.02	\$7.16	\$7.55
2016	\$7.30	\$7.39	\$7.60	\$7.60	\$7.94	\$7.45	\$7.01	\$7.40
2017	\$7.84	\$7.94	\$8.15	\$8.15	\$8.49	\$7.99	\$7.17	\$7.56
2018	\$8.39	\$8.49	\$8.69	\$8.70	\$9.04	\$8.52	\$7.34	\$7.73
2019	\$8.95	\$9.04	\$9.25	\$9.25	\$9.59	\$9.07	\$7.50	\$7.89
2020	\$9.50	\$9.59	\$9.80	\$9.80	\$10.15	\$9.61	\$7.68	\$8.07
2021	\$9.80	\$9.89	\$10.10	\$10.10	\$10.44	\$9.91	\$7.85	\$8.24
2022	\$10.11	\$10.20	\$10.41	\$10.41	\$10.75	\$10.21	\$8.03	\$8.43
2023	\$10.42	\$10.51	\$10.72	\$10.72	\$11.07	\$10.52	\$8.22	\$8.61
2024	\$10.75	\$10.84	\$11.05	\$11.05	\$11.39	\$10.84	\$8.41	\$8.80
2025	\$11.10	\$11.20	\$11.40	\$11.41	\$11.75	\$11.19	\$8.61	\$9.00
2026	\$11.44	\$11.53	\$11.74	\$11.74	\$12.09	\$11.52	\$8.81	\$9.20
2027	\$11.79	\$11.88	\$12.09	\$12.09	\$12.43	\$11.86	\$9.02	\$9.41
2028	\$12.15	\$12.24	\$12.45	\$12.45	\$12.79	\$12.22	\$9.23	\$9.62
2029	\$12.52	\$12.61	\$12.82	\$12.82	\$13.16	\$12.58	\$9.45	\$9.84
2030	\$12.90	\$13.00	\$13.20	\$13.21	\$13.55	\$12.96	\$9.67	\$10.06
2031	\$13.30	\$13.39	\$13.60	\$13.60	\$13.94	\$13.35	\$9.90	\$10.29
2032	\$13.71	\$13.80	\$14.01	\$14.01	\$14.35	\$13.75	\$10.13	\$10.53
2033	\$14.12	\$14.22	\$14.43	\$14.43	\$14.77	\$14.16	\$10.37	\$10.77
2034	\$14.56	\$14.65	\$14.86	\$14.86	\$15.20	\$14.58	\$10.62	\$11.02
2035	\$15.00	\$15.09	\$15.30	\$15.30	\$15.65	\$15.02	\$10.87	\$11.27
2036	\$15.46	\$15.56	\$15.76	\$15.77	\$16.11	\$15.47	\$11.13	\$11.53
2037	\$15.94	\$16.03	\$16.24	\$16.24	\$16.58	\$15.94	\$11.40	\$11.80
2038	\$16.42	\$16.52	\$16.72	\$16.73	\$17.07	\$16.42	\$11.67	\$12.07
2039	\$16.92	\$17.01	\$17.22	\$17.22	\$17.57	\$16.91	\$11.95	\$12.36
2040	\$17.44	\$17.53	\$17.74	\$17.74	\$18.08	\$17.41	\$12.24	\$12.64