

DIVISION OF CONSUMER ADVOCACY (DCA)

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OVERVIEW

The Division of Consumer Advocacy (“DCA”) represents, protects, and advances the interests of consumers of utility and transportation services before regulatory agencies, primarily the Hawaii Public Utilities Commission (“PUC”) and the Federal Communications Commission (“FCC”). DCA reviews requests for rate and tariff changes, capital improvement projects, integrated resource plans, certificates for authority to operate, and other applications filed by public utility and transportation companies, in addition to other proceedings opened by regulatory agencies to investigate or review generic issues. In representing the consumers of utility and transportation services before the PUC, DCA must analyze financial and statistical data, prior docketed material, industry standards, and the information provided by the utility and transportation companies to support their applications. After analyzing the information, DCA generally submits either written statements of position or testimonies explaining its analyses, findings, and recommendations to the PUC. Oral testimonies by DCA analysts, subject to utility company cross-examination, are required in evidentiary hearings before the PUC to resolve differences among the parties in utility proceedings.

Act 108, Session Laws of Hawaii (“SLH”) 2014 (“Act 108”), amended §269-51, Hawaii Revised Statutes (“HRS”), to authorize that the executive director of DCA shall be the consumer advocate in hearings before the PUC. Act 108 further provides that the executive director shall supervise and control the operations and personnel of the division, and shall be responsible for the performance of the duties imposed upon the division.¹

Composition

DCA consists of 17 employees, ranging from an administrator, a secretary, a utilities/transportation officer, a utilities/transportation specialist, an education specialist, rate analysts, researchers, engineers, attorneys, and clerical support. DCA is located on the third floor of the King Kalakaua Building, 335 Merchant Street. Its contact information is as follows: mailing address, P.O. Box 541, Honolulu, Hawaii 96809; phone number, 586-2800; internet address, cca.hawaii.gov/dca/.

The majority of DCA’s professional staff is comprised of the Rate Analysis Branch, the Engineering Branch, the Research Branch, and the Legal Branch.

The **Rate Analysis Branch** reviews and analyzes economic conditions, investor requirements and returns, and other aspects relating to the capital structure of regulated public utilities and transportation companies. In addition, the branch evaluates and develops recommendations relating to rate schedules, effects of rates, sales levels, and other pertinent considerations in establishing rates.

The **Engineering Branch** analyzes and makes recommendations on technical matters such as production capacity and efficiency, depreciation allowances, maintenance cost factors, engineering safety standards, plans for capital improvements, purchased power agreements, and quality of service standards.

¹ See Act 108, Section 9, amending §269-52, HRS.

The **Research Branch** analyzes and advises on matters imposed on regulated public utility and transportation industries, provides services and advice relating to the current operations of and evolving changes to regulated public utilities and transportation industries, conducts special studies on the changes in various regulatory areas, including energy and telecommunications, and assists and participates with other branches in developing data and conducting analyses on matters under examination.

The **Legal Branch** provides legal representation before regulatory agencies. The branch also provides general clerical support by updating and maintaining the DCA's docket, general office, and electronic data base files, formatting draft documents prepared by the technical staff and attorneys for filing with regulatory agencies and utility companies, and maintaining the office library.

GOALS and OBJECTIVES

DCA's goals and objectives can be categorized generally in three broad areas: consumer advocacy, policy advancement, and consumer education and outreach. These areas are not mutually exclusive and often overlap; however, for purposes of describing DCA's goals and how DCA will reach them, the goals will be described separately.

Consumer Advocacy

Goal

Ensuring that Hawaii's consumers receive fairly priced rates for safe and reliable services, while ensuring customer and environmental protections and renewable resource use, is DCA's primary goal. This goal generally involves balancing various competing interests.

Planned Approach/Methods

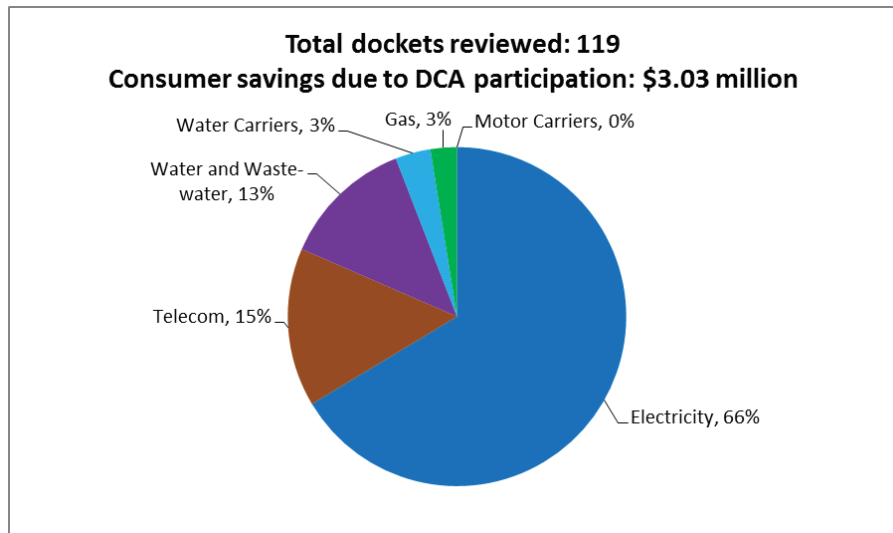
DCA's resources are focused on PUC proceedings, which often affect the rates and the reliability of utility and transportation systems and services. DCA's participation in PUC proceedings will typically involve some or all of the following:

1. Review of applications to ensure compliance with regulations;
2. Participation at PUC public hearings;
3. Procurement of consultant services to manage workload and for complex cases;
4. Completion of discovery;
5. Analysis of applications and supporting documents to determine the accuracy and the reasonableness of the requests;
6. Provision of recommendations to the PUC on the merits of the applications through statements of position or direct testimonies; provision of oral testimonies, which are subject to cross-examination in proceedings where evidentiary hearings are necessary; and
7. Completion of related legal actions, such as filings of legal briefs, motions, and appeals, etc., where necessary.

Measures

To measure DCA’s performance in advocating consumer interests, DCA tracks various categories of information. DCA monitors consumer savings resulting from its participation in PUC proceedings, the percentage of PUC decisions that adopt settlements reached amongst the parties to a proceeding, the number of service quality investigations DCA participates in, and the number of filings before the PUC reviewed by DCA. Chart 1 describes the total number of dockets DCA reviewed, the proportion of dockets reviewed by area, and the total consumer savings due to DCA participation.

Chart 1. Dockets Reviewed By Area and Overall Consumer Savings, Fiscal Year 2014

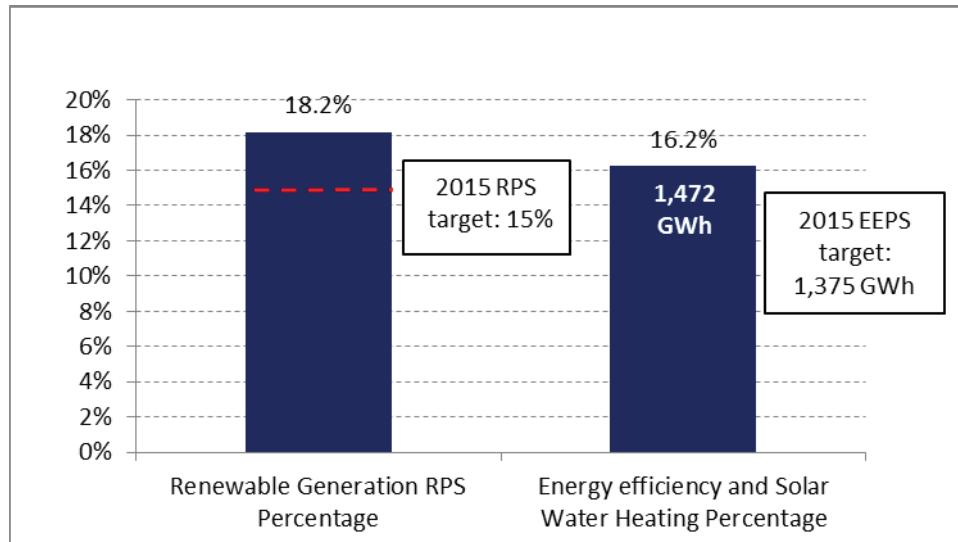


Policy Advancement

Goal

DCA will remain active in promoting policies to protect and advance the interests of utility and transportation consumers on the local, state, and national levels. Two of the major objectives that DCA will pursue are the advancement of federal and state broadband initiatives, as well as continued efforts to promote and facilitate Hawaii’s transition away from imported fossil fuels towards clean renewable energy. As shown in Chart 2, Hawaii is currently exceeding its 2015 Renewable Portfolio Standard (“RPS”) and Energy Efficiency Portfolio Standard (“EEPS”) goals.

Chart 2. Hawaii's Progress to Date Exceeds its 2015 RPS and EEPS Goals.



Planned Approach/Methods

In the PUC's generic, investigative, or policy proceedings, DCA follows a similar approach to its review and analysis of applications. A typical investigative proceeding may involve the following steps:

- After DCA and other parties to the proceeding state their initial positions on the issues, discovery and analyses are done to determine the reasonableness of the other parties' positions;
- Technical meetings between the parties are often held to discuss and educate each other on the issues and positions taken, and to determine where possible agreement may be reached;
- DCA then provides PUC with a recommendation that it believes is in the best interest of consumers; and
- DCA participates in evidentiary or panel hearings conducted by PUC. DCA presents its evidence by way of expert testimony on specific technical issues.

DCA monitors congressional activity in the energy and telecommunications areas. DCA maintains contact with Hawaii's Congressional delegation, particularly those members sitting on committees that deal with energy and telecommunications, and provides input where appropriate and when called upon.

DCA is actively involved in the National Association of State Utility Consumer Advocates ("NASUCA"). NASUCA participates in proceedings before the FCC, Congress, and the federal courts in advancing consumer interests on national issues, many of which affect Hawaii consumers.

DCA is actively involved with the state legislature and provides testimonies that detail consumer benefits or detriments of specific proposals and bills being considered by the various legislative committees. In the 2014 legislative session, DCA monitored and testified on 27 bills and submitted written testimony on 51 occasions.

Measures

Measuring the performance of DCA's efforts to promote policy objectives is inexact. While DCA generally tracks the percentage of its positions with which the PUC ultimately agrees, the measure does not capture the efforts throughout proceedings to educate and work with other parties to come to agreement on issues.

Education & Outreach

Goal

DCA's goal is to encourage the public to be wiser consumers of public utility services by, among other things, emphasizing the possible effects that their consumption habits may have on utility rates and the environment. It is through the education and outreach process that DCA aims to gather consumer input on utility issues and to encourage consumers to be more involved in utility proceedings. DCA attends public meetings and hearings to learn of consumer complaints and concerns.

Planned Approach/Methods

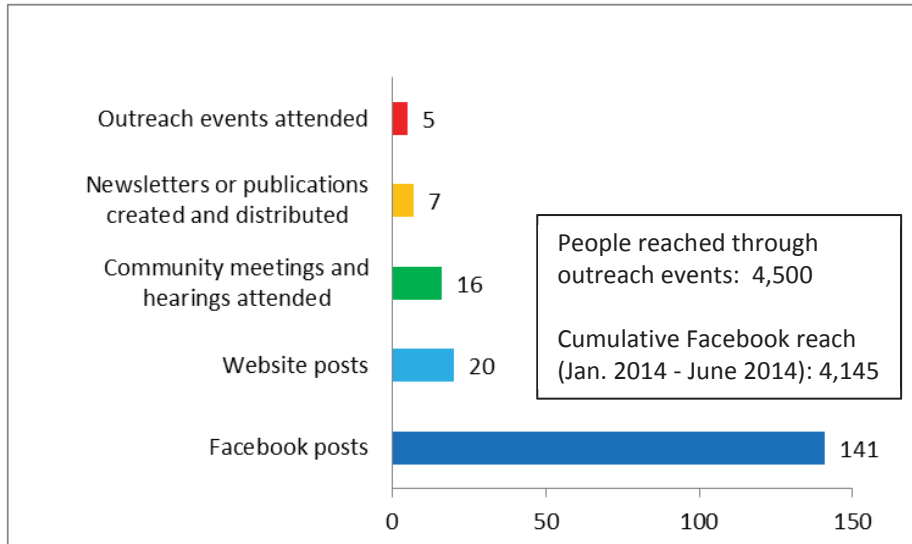
DCA can accomplish its goal of positively affecting the habits of consumers on a statewide basis through the use of its web site and public outreach activities. DCA established the following action plan to accomplish its goals and objectives:

1. Update and improve its website with consumer-friendly and useful content;
2. Use social media, such as Facebook, to reach a greater number of consumers;
3. Attend public hearings and meetings to listen to consumer complaints and concerns;
4. Establish information booths and provide presentations at community events, such as home shows and public fairs throughout the state and build positive relationships with both business and individual community members;
5. Improve communications with consumers and the public through expanded distribution and publication of its newsletter; and
6. Hold informational seminars or use public service announcements to highlight different utility issues and topics.

Measures

To measure DCA's performance and progress of its education and outreach activities, it tracks the number of people reached through education and outreach events, newsletters and other publications distributed, and consumers assisted with complaints and other issues. Chart 3 illustrates various ways DCA engaged in community outreach and education in Fiscal Year 2014.

Chart 3. DCA’s Multi-pronged Approach to Community Outreach and Education



ACCOMPLISHMENTS

Results of DCA’s efforts to protect and advance the interests of consumers in Fiscal Year 2014 are summarized below for some of the more significant matters in which DCA was involved:

Advocacy before the Public Utilities Commission

Energy Dockets

Competitive Waiver Projects

The Competitive Bidding Framework was adopted by the PUC in Order No. 23121, filed on December 8, 2006, to establish guidelines governing the use of a competitive process to acquire or build new generation in Hawaii. PUC may approve waivers from this process if, for example, it can be shown that more cost effective resources would likely be acquired more efficiently through an alternate procurement process. DCA reviewed applications by Hawaiian Electric Company, Inc. (HECO) for waivers involving a total of thirteen renewable energy projects whose proposed levelized prices fell significantly below the price range of other recently approved renewable energy projects on Oahu (21.8 to 23.6 cents per kWh). On October 10, 2014, HECO submitted a power purchase agreement (PPA) for one of the projects to the PUC for approval. PPA negotiations for six of the projects are ongoing. Four projects were voluntarily withdrawn.

In addition to providing comments and recommendations regarding waiver approvals, DCA has periodically met with HECO and various developers to discuss PPA progress and design. Table 1 summarizes the competitive waiver dockets DCA reviewed in Fiscal Year 2014, including how many projects each docket involved, the total number of megawatts (“MW”) proposed, the average proposed price, and the status of each docket.

Table 1. Summary of Competitive Waiver Dockets

Project(s)/Docket No.	No. of Projects	Total MW	Price* (cents per kWh)	Status
Initial Waiver Projects Docket No. 2013-0156	5	63.9	15.934	PUC approved subject to conditions. Four projects were voluntarily withdrawn. One PPA submitted for PUC approval on October 10, 2014.
Second Waiver Projects Docket No. 2013-0381	6	210	15.576	PUC approved subject to conditions. PPA negotiations are ongoing. PPAs are due December 4, 2014.
Kahe PV Project** Docket No. 2013-0360	1	15	16.133; revised to 13.8	Pending PUC decision.
Na Pua Makani Wind Docket No. 2013-0423	1	24	14.998	Pending PUC decision.

* Average levelized price, as proposed in each Application.

** The Kahe PV Project's "price" was initially based on a 30 year term. All other levelized prices, including the revised Kahe PV Project's price are based on a 20 year term.

Selected waiver projects are discussed in further detail below.

*Kahe Utility-Scale Photovoltaic ("PV") Generating System ("Kahe PV Project")
(Docket No. 2013-0360)*

On October 22, 2013, HECO filed an application requesting a waiver from the Competitive Bidding Framework for the 15 MW Kahe PV Project. HECO estimated the cost of this project to be \$42.4 million with a levelized cost, assuming a 30-year life, of approximately 16.1 cents per kWh. In its May 15, 2013 comments, DCA contended that HECO's proposed levelized cost appeared too high given that 1) HECO owns the land upon which the project would be sited, 2) interconnection costs should be relatively small since the project is at HECO's generating facility, and 3) HECO amortized its costs over a longer period of time. DCA asserted that it was likely to oppose HECO's Kahe PV Project application.

In July 2014, HECO significantly lowered its cost estimate for the Kahe Project from \$42.4 million to \$39.9 million. HECO also lowered its estimated levelized costs from 16.1 cents per kWh over 30 years to 13.8 cents per kWh over 20 years, a rate lower than the proposed pricing of other competitive waiver projects. Although AES Hawaii and Hawaii Renewable Energy Association ("HREA") continued to object to HECO's ownership of the Kahe PV Project, DCA contended that further analysis is necessary to determine whether Hawaii's energy market is large and robust enough to sustain a model without some level of utility owned generation. DCA subsequently recommended PUC approve HECO's request for a waiver from the Competitive Bidding Framework for the Kahe PV Project. This docket is still pending before the PUC.

*HECO's Application for Approval of the Na Pua Makani Wind Farm
(Docket No. 2013-0423)*

On December 12, 2013, HECO filed an application for the approval of the Na Pua Makani wind farm that was proposed for Kahuku, Oahu by wind developer Champlin. DCA attended three Kahuku community meetings to listen to the objections of Kahuku residents. The Kahuku Community Association and the Kahuku Neighborhood Board both adopted resolutions opposing the proposed wind farm.

Although the proposed Power Purchase Agreement offered the lowest priced wind energy at approximately 14 cents per kwh at the outset of the contract, DCA in recognition of the Kahuku community's opposition to the project recommended that PUC hold on any decision approving the project pending the completion of the Environmental Impact Statement that should consider environmental, societal, and archaeological impacts. The decision is still pending before the PUC.

MECO's Application for Approval of a Waiver from the Competitive Bidding Process for Anaergia's Mahinahina Energy Park Project (Docket No. 2013-0114)

On May 10, 2013, Maui Electric filed an application for approval of a waiver from the competitive bidding process for a proposed Power Purchase Agreement with project developer Anaergia for a biomass project that would generate electricity to be sold to MECO. This project arises out of Maui County's need to dispose of treated wastewater in the Lahaina/Kaanapali area. Currently, Maui County disposes of R-1 treated wastewater into ejection wells. Earth Justice filed a lawsuit against Maui County alleging that Maui County is in violation of the Clean Water Act, because the effluent in the ejection wells eventually finds its way to the ocean. A federal district court judge ruled against Maui County on liability. Maui County is attempting to resolve that lawsuit by agreeing to stop the use of the ejection wells. Instead, the treated effluent will be used to irrigate a biomass crop that will then be digested and converted to electricity by Anaergia.

On September 6, 2013, DCA filed its statement of position recommending approval of the waiver from the competitive bidding process, because the project meets one of the criteria for a waiver in that it serves an important governmental purpose. On May 13, 2014, the PUC issued a decision and order approving the waiver from the competitive bidding process. Currently, Maui Electric is in negotiations with Anaergia over the terms of the Power Purchase Agreement.

HECO Decoupling Investigation

The investigation of HECO's decoupling mechanism was divided into two separate proceedings – Schedule A and B. Schedule A went to an evidentiary hearing in January, 2014. One of the principal Schedule A issues was the interest rate on HECO's Revenue Balancing Account (RBA) that had been set at 6% by previous commission order. HECO took the position that the interest rate should be increased, which would have meant a small increase in electricity rates. The DCA took the position that the interest rate should be lowered consistent with other interest rates HECO is entitled to charge. The PUC ruled in favor of the DCA and lowered the interest rate on RBA balances. Following the hearing, the parties agreed upon the performance metrics that HECO would report on its website.

Schedule B issues involve the much more complex issue of modifying the Rate Adjustment Mechanism (RAM) that HECO uses to put into rate base its capital expenditures on an annual basis rather than having to await its next rate case in the three year cycle that had previously been agreed to and ordered by the commission.

The parties, including DCA, exchanged Initial Statements of Position, and then filed Reply Statements of Position in August, 2014. The PUC has scheduled panel hearings on Schedule B issues for the end of October, 2014.

On Bill Financing

The On-Bill Financing Program is intended to reduce the market barriers that prevent customers without sufficient resources or incentives (e.g., low to middle income customers and those in the rental market) from making efficient, cost-saving energy investments. On August 15, 2011, pursuant to Act 204, SLH 2011, the PUC opened Docket No. 2011-0186 to investigate whether on-bill financing is a viable financing method that should be implemented in Hawaii. Following various workshops and discussions, the PUC issued Order No. 30974 on February 1, 2013, which found a properly designed on-bill financing program for all electric utility customers in Hawaii could be viable, contingent on program details. The PUC further determined that a Working Group comprised of the Parties and Participants from Docket No. 2011-0186, financial institutions, representatives of target on-bill financing customer groups, and other contributing entities should work together toward the development of a program targeting the hard-to-reach low income and rental customer markets. The Finance Program Administrator, AFC First, was selected and became part of the working group discussions in December 2013.

DCA has worked collaboratively as part of the On-Bill Financing Working Group, providing comments and recommendations regarding program design, operating procedures, program evaluation and measurement, and the integration of EEPS goals. While supportive of the fundamental objectives of the program, DCA opposed measures that would have shifted risk to and unduly burdened consumers and sought to minimize the potential impact of the program on non-participant customers.

The Hawaii Energy Bill Saver Program is the result of the numerous Working Group meetings and discussions. On June 3, 2014, the PUC opened Docket No. 2014-0129 to establish and implement this on-bill financing program. On August 7, 2014, the PUC issued Order No. 32252 directing the parties, interveners, and participants in the docket to address whether the proposed Hawaii Energy Bill Saver Program is just, reasonable, and consistent with the public interest.

On October 1, 2014, the PUC issued Order No. 32318 approving DBEDT's Program Order request subject to certain modifications and oversight. The PUC adopted several of DCA's recommendations regarding the use of GEMS funds and the implementation of data collection and reporting procedures to evaluate program success.

*Kauai Island Utility Cooperative ("KIUC") Decoupling Mechanism
(Docket No. 2014-0016)*

On January 23, 2014, KIUC filed an application with the PUC for approval of KIUC's proposed decoupling mechanism that would de-link KIUC's revenue from the sale of electricity. KIUC's proposed decoupling mechanism would eliminate any over collection of revenues and the additional expense of revenue taxes KIUC must pay from any over-collection through rates. KIUC asserts that the decoupling mechanism would result in lowering electricity rates to its members.

DCA worked collaboratively with KIUC to establish a decoupling mechanism that would protect consumers from any potentially large rate increase resulting from decoupling. Consistent with Act 57 that recognizes that as a utility cooperative, KIUC, under appropriate circumstances, should be given less regulatory scrutiny than an investor-owned utility, DCA did not object to the decoupling proposal, but instead worked to improve the mechanism with adequate safeguards for consumers. On October 10, 2014, KIUC and DCA filed an agreed-upon decoupling mechanism with the PUC.

Water and Wastewater Rate Cases

Table 2 summarizes the water and wastewater rate cases that the DCA was involved in during Fiscal Year 2014. The table includes the rate increase requested by each utility, the DCA proposed rate increase or decrease, and the rate increase authorized by the PUC:

Table 2. Summary of Water and Wastewater rate cases reviewed by DCA

Utility Name	Docket No.	Rate Increase Requested by Utility		Rate Increase (Decrease) Proposed by DCA		Rate Increase Authorized by PUC	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
Hawaii Water Service Co., Pukalani District	2011-0148	\$1,325,924	225%	\$153,651	26%	\$586,352	107%
Waikoloa Resort Utilities, Inc.	2011-0331	\$4,133,771	88.38%	(\$139,069)	(2%)	\$1,953,396	28.16%
Waikoloa Sanitary Sewer Co.	2012-0147	\$1,378,084	141.7%	\$309,301	31.4%	Pending ²	Pending
Waikoloa Water Co.	2012-0148	\$784,387	36%	\$53,540	2.5%	Pending ³	Pending
Hawaiian Beaches Water Co.	2013-0203	\$270,748	37.35%	\$107,159	14.3%	\$161,698	21.83%
Total		\$7,892,914		\$484,582			

Advocacy through Participation on Committees and Boards

Enhanced Wireless 911 (“E911”) Services

Act 168, SLH 2011 (“Act 168”), created an E911 Fund and established the E911 Board. Act 168 established the framework to implement the State’s wireless E911 system to route emergency calls to emergency responders, along with the wireless callers’ identification and location. Under Act 168, the E911 Board oversees the collection and distribution of money collected by the E911 special fund and designates the Executive Director of DCA as a member of the board. During Fiscal Year 2014, DCA was involved in the E911 Board’s successful efforts to transition its daily operations from a consultant to two full-time employee positions. The E911 Board is in the process of recruiting for the positions of Executive Director and Assistant Executive Director.

² DCA entered into a settlement agreement with the utility on November 15, 2013 based on a proposed rate increase of \$681,425 or 69.2%. A PUC decision on the settlement agreement has not been issued.

³ DCA entered into a settlement agreement with the utility on August 14, 2013 based on a proposed rate increase of \$145,976 or 6.8%. A PUC decision on the settlement agreement has not been issued.

One Call Center Advisory Committee

The Executive Director of the DCA is also a member of the One Call Center Advisory Committee, which makes recommendations to the PUC regarding the implementation of Chapter 269E, HRS, Act 141, SLH 2004. This advisory committee was integral in developing the request for proposals for a vendor to operate a “call-before-you-dig” system. The system, which was operational on January 1, 2006, will reduce the risk of critical services being disrupted because utility systems were inadvertently damaged due to excavation work conducted in areas where the systems are placed in underground facilities. This will ensure greater public health and safety, and ultimately save excavators time and money.

Energy Policy Forum

The Executive Director of DCA is a member of the Hawaii Energy Policy Forum (“HEPF”), which is a collaborative organization of the University of Hawaii at Manoa. HEPF consists of members from the business, government, and regulatory communities. Meetings are held quarterly to discuss Hawaii’s energy needs for both electricity and transportation. HEPF provides support to other organizations, such as the Hawaii Clean Energy Initiative Steering Committee. In FY 2014, DCA continued to maintain its active role in the meetings providing input to HEPF concerning consumer concerns in the regulatory process before the PUC and the difficulties facing the state in achieving reliable electricity service at reasonable rates.

Hawaii Clean Energy Initiative (“HCEI”)

On January 31, 2008, the State of Hawaii and the United States Department of Energy (“U.S. DOE”) launched the HCEI, an agreement, which among other things, established for the State a goal of 70% clean energy resource use by 2030. The State and the U.S. DOE formed various committees designed to examine differing aspects of the State’s energy use – transportation, electricity, energy efficiency, etc. The DCA is participating in the HCEI’s Integration Committee, which, with the aid of U.S. DOE experts, seeks to consolidate the themes and suggestions put forth by the remaining committees.

As part of HCEI, the Executive Director of DCA also participates in the Management Committee, which deals with the high level planning associated with various aspects of the technical committees that are analyzing various areas (electricity, end-use efficiency, transportation, fuels, and outreach) that are expected to be integral to the success of HCEI.

DCA also participates in the Technical Advisory Group (“TAG”) that is responsible for evaluating the energy efficiency process that has been transitioned from the HECO Companies to a third-party administrator, also now known as Hawaii Energy. As part of this process, the TAG currently meets on a quarterly basis and evaluates various aspects of the measures being implemented to help plan, evaluate, and implement energy efficient programs in the service territories of the HECO Companies. Using the monies collected through the Public Benefits Fund surcharge, the TAG evaluates the use of the monies to help Hawaii’s efforts to reduce its over-reliance on imported fossil fuels.

The HCEI management committee, which includes the Consumer Advocate, is working on HCEI 2.0. A new Memorandum of Understanding between the State of Hawaii and the U.S. Department of Energy was drafted in FY 2014 then executed in FY 2015. Finally, the management committee determined

that the Energy Agreement, entered into in 2008, contained a number of provisions that were no longer applicable and voted to rescind it.

Education and Outreach

During the past year, DCA has continued to focus on expanding its education and outreach activities. This has allowed DCA to increase its ability to educate consumers and extend its reach into communities throughout the State. In addition to attending community fairs, DCA publishes its own newsletter and has increased the plan frequency of these newsletters from a quarterly to monthly schedule. In addition, the DCA is focusing on improving its web presence by keeping the online information relevant and informative.

Consumer Advocate launches Facebook page

DCA created its Facebook page in an effort to reach consumers more quickly through social media and made its first post on January 16, 2014. Through Facebook, DCA educates consumers by posting energy and water saving tips and notifies consumers of pertinent, utility-related online newspaper articles, blog posts, and radio and television programs. The Facebook page is also used to announce upcoming utility-related public hearings, consumer fairs, utility and green energy conferences, and media events. As of June 30, 2014, DCA's Facebook reach was 4,145.

CRF Financial Summary

The CRF financial summary⁴ relating to DCA for FY13-14 as follows:

Personnel Expenses	Operating Expenses	Total Expenses	Revenues Received
\$1,428,340	\$878,565	\$2,306,905	\$3,092,514

CONCLUSION

DCA will continue to prioritize its caseload to target projects and consumer issues that have the greatest impact on the ratepayers of utility and transportation services in Hawaii. In addition, DCA is expanding its education and outreach efforts. These efforts place DCA in a better position to take a more proactive approach to address specific consumer issues and to gain greater public participation in decisions that affect their public utility and transportation services.

⁴ These are pre-close numbers.