

HB 4167 BUDGET REPORT and MEASURE SUMMARY

Joint Committee On Ways and Means

Prepared By: Linnea Wittekind, Department of Administrative Services

Reviewed By: John Terpening, Legislative Fiscal Office

2019-21

Department of Environmental Quality

Oregon Business Development Department

Public Utility Commission

Housing and Community Services Department

Department of Land Conservation and Development

Department of Agriculture

Department of Forestry

Department of Transportation

Department of Justice

Department of Administrative Services

Legislative Revenue Office

PRELIMINARY

Budget Summary*

	2019-21 Legislatively Approved Budget		2019-21 Committee Recommendation		Committee Change	
Department of Environmental Quality						
General Fund	\$	-	\$	8,877,792	\$	8,877,792
Other Funds	\$	-	\$	145,722	\$	145,722
Oregon Business Development Department						
General Fund	\$	-	\$	10,100,000	\$	10,100,000
Other Funds	\$	-	\$	500,000	\$	500,000
Public Utility Commission						
General Fund	\$	-	\$	29,566	\$	29,566
Other Funds	\$	-	\$	1,349,780	\$	1,349,780
Housing & Community Services Department						
General Fund	\$	-	\$	158,091	\$	158,091
Department of Land Conservation & Development						
General Fund	\$	-	\$	327,162	\$	327,162
Department of Agriculture						
General Fund	\$	-	\$	111,536	\$	111,536
Department of Forestry						
General Fund	\$	-	\$	119,215	\$	119,215
Department of Transportation						
Other Funds	\$	-	\$	127,517	\$	127,517
Department of Justice						
Other Funds	\$	-	\$	455,597	\$	455,597
Department of Administrative Services						
Other Funds	\$	-	\$	307,170	\$	307,170
Legislative Revenue Office						
General Fund	\$	-	\$	150,000	\$	150,000

2019-21 Budget Summary

General Fund Total	\$	-	\$	19,873,362	\$	19,873,362
Other Funds Limited Total	\$	-	\$	2,885,786	\$	2,885,786

*Excludes Capital Construction

Position Summary

	2019-21 Legislatively Approved Budget	2019-21 Committee Recommendation	Committee Change
Department of Environmental Quality			
Authorized Positions	0	31	31
Full-time Equivalent (FTE) positions	0.00	17.33	17.33
Public Utility Commission			
Authorized Positions	0	8	8
Full-time Equivalent (FTE) positions	0.00	3.75	3.75
Housing & Community Services Department			
Authorized Positions	0	2	2
Full-time Equivalent (FTE) positions	0.00	0.55	0.55
Department of Land Conservation & Development			
Authorized Positions	0	2	2
Full-time Equivalent (FTE) positions	0.00	1.25	1.25
Department of Agriculture			
Authorized Positions	0	1	1
Full-time Equivalent (FTE) positions	0.00	0.50	0.50

Position Summary

	<u>2019-21 Legislatively Approved Budget</u>	<u>2019-21 Committee Recommendation</u>	<u>Committee Change</u>
Department of Forestry			
Authorized Positions	0	1	1
Full-time Equivalent (FTE) positions	0.00	0.50	0.50
Department of Transportation			
Authorized Positions	0	1	1
Full-time Equivalent (FTE) positions	0.00	0.50	0.50
Department of Justice			
Authorized Positions	0	2	2
Full-time Equivalent (FTE) positions	0.00	1.08	1.08
Department of Administrative Services			
Authorized Positions	0	2	2
Full-time Equivalent (FTE) positions	0.00	1.25	1.25

Summary of Revenue Changes

House Bill 4167 provides \$22,759,148 total funds to 11 agencies for the purpose of implementing a cap and trade program called the Oregon Greenhouse Gas Initiative, focused on meeting state greenhouse gas emission reduction goals. The goals within House Bill 4167 are to reduce greenhouse gas emission levels in Oregon to at least 45 percent below 1990 emission levels by 2035 and to at least 80 percent below 1990 emissions levels by 2050.

The Transportation Decarbonization Investment Account and the Climate Investment Fund accounts are created in House Bill 4167. Revenues for these funds will come from auctions of allowances and could be available as soon as January 2022, when the first auction is required to take place. Revenues are to be distributed in order as follows:

1. Auction proceeds first are deposited in the Auction Proceeds Distribution Fund.
2. Constitutionally dedicated funds within the Auction Proceeds Distribution Fund are distributed to the:

- a. Transportation Decarbonization Investments Account (TDIA) within the State Highway Fund
 - b. Common School Fund
3. Certain remaining funds in the Auction Proceeds Distribution Fund are distributed to the Oregon Greenhouse Gas Initiative Operating Fund for administration of the program.
 4. All remaining funds are distributed to the Climate Investment Fund (CIF).

The Transportation Decarbonization Investments Account

Funds in the TDIA are distributed to the Oregon Department of Transportation (ODOT). Ten percent of funds go to ODOT for transportation projects, and 90 percent to local governments for planning and implementation of metropolitan climate plans.

Climate Investments Fund

Funds in the CIF are first distributed to the Just Transition Fund. The Just Transition Fund receives 10 percent or \$10 million from the CIF, whichever is less.

Remaining funds are to be distributed as follows:

- 25 percent goes to the Oregon Watershed Enhancement Board (OWEB) for uses that benefit natural and working lands;
- 25 percent goes to the Oregon Department of Forestry (ODF) for wildfire mitigation; and
- 50 percent is allocated by the Legislature, in a manner that prioritizes greenhouse gas reductions, with:
 - 10 percent distributed for the benefit of eligible Indian tribes;
 - 20 percent to local governments; and
 - 20 percent to agencies of state government.

House Bill 4167 provides the following funding for the 2019-21 biennium:

- Appropriates \$8,877,792 General Fund and increases Other Funds expenditure limitation by \$145,722 at the Department of Environmental Quality for the purpose of establishing a Greenhouse Gas Reduction Board and an Office of Greenhouse Gas Regulation to implement the Oregon Greenhouse Gas Initiative;
- Appropriates \$10,000,000 General Fund for the Oregon Business Development Department (OBDD) to establish the Traded Sector Greenhouse Gas Reduction Revolving Loan Fund for low- or zero-interest loans disbursed to trade-exposed natural gas users and emissions-intensive trade exposed facilities for projects that will lead to reductions in emissions. The measure also provides OBDD a

\$500,000 Other Funds expenditure limitation increase for administrative costs related to the new loan program. An additional appropriation of \$100,000 General Fund is provided for expenses related to the reporting requirements of the measure;

- An increase in General Fund appropriation of \$29,566 and Other Funds expenditure limitation by \$1,349,780 for the Public Utility Commission to undertake rulemaking on how to distribute allowances for electric companies and natural gas users; oversee utility trust accounts; consult on the climate action investment plan; determine and oversee rate relief programs for certain energy consumers; incorporate the goals of this act into planning and rate cases; and fulfill reporting requirements;
- Appropriates \$158,091 General Fund to the Oregon Housing and Community Services Department to work with the Office of Greenhouse Gas Regulation and other stakeholders to develop a proposal for assisting households that heat with fuel other than natural gas;
- Appropriates \$119,215 General Fund to the Oregon Department of Forestry to assist with the development of forestry carbon offset protocols and reporting on offset and other projects related to the bill;
- An increase in General Fund appropriation of \$327,162 for the Department of Land Conservation Development to develop and review metropolitan climate plans;
- An increase in General Fund appropriation of \$111,536 for the Department of Agriculture to provide consultation and research regarding agricultural lands and industries for designation of energy intensive trade exposed entities and impacted communities, and research the viability of different offset projects;
- Increases Other Funds expenditure limitation by \$127,517 for the Department of Transportation to hire a TDIA program manager, who will oversee rulemaking, program development activities, and project selection;
- Increases Other Funds expenditure limitation by \$455,597 for the Department of Justice to provide anticipated additional legal work for the Department of Environmental Quality and the Public Utility Commission;
- Increases Other Funds expenditure limitation by \$307,170 for the Department of Administrative Services to develop the model procurement program and conduct a study relating to emissions; and
- An increase in General Fund appropriation of \$150,000 for the Legislative Revenue Office to contract with a third party to complete reports required by the bill.

Summary of Natural Resources Subcommittee Action

Department of Environmental Quality

The Subcommittee approved \$8,877,792 General Fund and \$145,722 Other Funds expenditure limitation, and the establishment of 31 positions (17.33 FTE) in the 2019-21 biennium for the purpose of establishing a Greenhouse Gas Reduction Board (GGRB) and an Office of Greenhouse Gas Regulation within the Department of Environmental Quality (DEQ). The GGRB is the rulemaking authority for the Office to implement the

Oregon Greenhouse Gas Initiative within DEQ. The Department will require two support positions for the GGRB, an Operations and Policy Analyst 4 (0.63 FTE) and an Administrative Specialist 2 (0.50 FTE).

The Office of Greenhouse Gas Regulation (OGGR), a newly established office (division) within DEQ, is led by a program administrator who is appointed by the Governor and confirmed by the Senate. The Office is also directed to provide technical and clerical support to its rulemaking authority, the GGRB. The OGGR is responsible for developing and implementing all elements of the OGGI, including rulemaking, program development, procurement, and IT systems; operate auctions of allowances; track emissions allowances and retire them at the correct rate for each entity; designate impacted communities, which are communities in Oregon at risk of being disproportionately impacted by climate change; develop a Just Transition Plan for aiding households, businesses, and workers impacted by climate change or climate change policies; develop a climate investment action plan for new revenues; and complete various reporting requirements, among other duties.

DEQ shall create a new budget structure for expenditures related to the GGRB and the OGGR. The OGGR will require staffing for its two programs, the Carbon Markets and Policy and Proceeds programs, as well as administrative support. In addition to the two support positions for the GGRB described above, the Office will require 17 positions (9.16 FTE) in the 2019-21 biennium, with the following permanent positions required beginning April 1, 2019: an Administrator (Principal/Executive Manager G) (0.63 FTE), two Principal Executive Manager E positions (1.26 FTE), an Operations and Policy Analyst 4 (0.63 FTE), an Operations and Policy Analyst 3 (0.63 FTE), and one Project Manager 3 (0.63 FTE). Additionally, the Office will need a limited duration Operations and Policy Analyst 3 (0.63 FTE) for specific reporting required. These positions will be crucial to getting the program up and running as quickly as possible in order to meet the statutory deadline of an auction in January 2022.

Additional permanent positions for the program will begin July 1, 2019, and include: an Economist 4 (0.50 FTE), an Economist 3 (0.50 FTE), a Research Analyst 4 (0.50 FTE), a Research Analyst 3 (0.50 FTE), two Natural Resource Specialist 4s (1.00 FTE), an Operations and Policy Analyst 3 (0.50 FTE), a Plan Analyst 3 (0.25 FTE), an Executive Support Specialist (0.50 FTE), and an Office Specialist 2 (0.50 FTE).

The new program will require the following positions to support hiring, rule-making, budget monitoring, and other administrative duties including: an Environmental Law Specialist (0.50 FTE), a Public Affairs Specialist 2 (0.50 FTE), a limited duration Business Analyst/Operations and Policy Analyst 3 (0.63 FTE), an IT Project Manager 3 (0.63 FTE), a Human Resource Analyst 2 (0.63 FTE), a limited duration Human Resource Analyst 1 (0.63 FTE), two Operations and Policy Analyst 3 positions (1.13 FTE), an Operations and Policy Analyst 4 (0.63 FTE), and a Procurement Contract Specialist 3 (0.63 FTE).

Under House Bill 4167, DEQ's existing Air Quality division receives new and expanded authority, expanding the state's mandatory Greenhouse Gas Reporting program and requiring DEQ to establish new regulations limiting methane emissions from certain landfills. The Subcommittee approved two positions (1.13 FTE) to support this work within the Air Quality division for the 2019-21 biennium: a Principal Executive Manager E (0.63 FTE), and an Environmental Engineer (0.50 FTE).

In total the additional staff will increase Personal Services costs by \$3,822,718 General Fund and \$126,472 Other Funds. The positions for DEQ have been budgeted at Step 5 due to recent changes in pay equity requirements that have increased the average starting pay for new position hires at the Department. In addition to position costs, the following expenditures are expected to be incurred in the 2019-21 biennium to carry out the provisions of HB 4167:

- Increase facility rent by \$327,600 General Fund;
- Legal costs of \$850,000 General Fund related to fees paid to the Department of Justice including the cost to defend legal challenges;
- One-time estimated contracting costs of \$500,000 General Fund due to initial setup and customization of an auction platform with a third party;
- Ongoing contract with a third party to provide cap and trade services at an estimated cost of \$900,000 annually;
- One-time costs of \$250,000 General Fund for modifications to the Department's Environmental Data Management System related to new greenhouse gas reporting requirements;
- One-time contracting costs of \$50,000 General Fund for an independent Quality Assurance contract for projects going through Stage Gate review;
- One-time contracting costs of \$400,000 General Fund for the development of offset protocols;
- One-time contracting costs of \$500,000 General Fund for a review of methods to reduce industrial manufacturing;
- One-time contracting costs of \$400,000 General Fund for the development of a forecast for the allowance budget; and
- One-time contracting costs of \$125,000 General Fund for a waste-reduction and recycling study.

Oregon Business Development Department

House Bill 4167 provides two General Fund appropriations totaling \$10,100,000 to the Oregon Business Development Department (OBDD). Of this total, \$10 million is for deposit in the newly created Traded Sector Greenhouse Gas Reduction Revolving Loan Fund. The fund is separate and distinct from the General Fund, with moneys continuously appropriated to OBDD in order to issue loans and administer the program. The other \$100,000 of General Fund is appropriated for expenses related to the reporting requirements of the measure.

Revolving loan funds are to be disbursed from the Traded Sector Greenhouse Gas Reduction Revolving Loan Fund as low- or zero-interest loans to trade-exposed natural gas users and emissions-intensive trade exposed facilities, to finance projects or upgrades that will lead to reductions in greenhouse gas emissions. OBDD anticipates that they will work with a third-party contractor with expertise in greenhouse gas emissions and mitigation technologies to develop rules and administer the fund. The measure provides OBDD with \$500,000 of Other Funds expenditure

limitation for administrative costs to the department for the loan program. No Other Funds expenditure limitation is provided for making loans, as the first loan commitments are not expected to be made until January 2022.

Oregon Public Utility Commission

The Subcommittee approved a \$29,566 increase in General Fund appropriation and an increase in Other Funds expenditure limitation by \$1,349,780, and the establishment of eight permanent positions (3.75 FTE) in the 2019-21 biennium. Anticipated staffing needs include one Principal Executive Manager E (0.50 FTE), four Utility and Energy Analysts 3 (2.00 FTE), one Economist 4 (0.50 FTE), one Operations and Policy Analyst 3 (0.50 FTE), and one Accountant 3 (0.25 FTE). The positions for PUC have been budgeted at Step 6 due to recent changes in pay equity requirements that have increased the average starting pay for new position hires at the agency.

With the passage of House Bill 4167, the Oregon Public Utility Commission (PUC) is directed to undertake rulemaking on how to distribute allowances for electric companies and natural gas users; oversee utility trust accounts; consult on the climate action investment plan; determine and oversee rate relief programs for certain energy consumers; incorporate the goals of this act into planning and rate cases; and fulfill reporting requirements.

Department of Housing and Community Services

The Subcommittee approved a \$158,091 General Fund appropriation and two limited duration positions (0.55 FTE) to the Oregon Housing and Community Services Department (OHCS) to work with the OGGR and other stakeholders to develop a proposal for assisting households that heat with a fuel other than natural gas. The proposal should prioritize assistance to low- and moderate-income households or impacted communities and a report to the Legislative Assembly is required by September 15, 2021.

The Department will require two part-time limited duration positions in the 2019-21 biennium to complete the scope of work as directed by the bill, including a three-quarter time limited duration Program Analyst 4 position (0.44 FTE) and a one-quarter time limited duration Administrative Specialist 2 position (0.11 FTE). OHCS anticipates an effective date of May 1, 2020 for the Program Analyst 4 position and an effective date of July 1, 2020 for the Administrative Specialist 2 position. It is anticipated the implementation of the bill will require ongoing work for the positions through October 2021 and should be requested as part of the 2021-23 biennial budget development process.

Department of Land Conservation and Development

The Subcommittee approved an increase of \$327,162 in General Fund and two permanent full-time positions (1.25 FTE) in the 2019-21 biennium in the Department of Land Conservation and Development (DLCD). The Department will be involved in the development and review of metropolitan climate plans which local governments are required to develop in order to receive TDIA funds.

To assist with rulemaking, technical assistance to local governments, and plan review, DLCD will hire a full-time Planner 3 (0.50 FTE) and a full-time Operations and Policy Analyst 1 (0.50 FTE) with an increase in 0.25 FTE for an existing Planner 2 position. The additional staff resources will

allow the agency to complete rulemaking to define the contents of metropolitan climate plans, provide technical assistance to metropolitan planning organizations in the development of those plans, and provide plan review.

Department of Agriculture

The Subcommittee approved a \$111,536 General Fund appropriation to hire one temporary Natural Resource Specialist 3 (0.50 FTE) in the 2019-21 biennium. This position will provide consultation and research regarding agricultural lands and industries for designation of energy intensive trade exposed entities and impacted communities, and research the viability of different offset projects.

Oregon Department of Forestry

The Subcommittee approved a \$119,215 General Fund appropriation and the establishment of a permanent full-time Operations and Policy Analyst 4 (0.50 FTE). The position will be used in conjunction with existing Department resources to begin work with the OGGR to develop protocols for greenhouse gas offset projects related to the forestry sector.

Department of Transportation

The Subcommittee approved an increase of \$127,517 Other Funds expenditure limitation and establishment of a permanent full-time Operations and Policy Analyst 4 position (0.50 FTE) to the Policy, Data and Analysis Division of the Department of Transportation (ODOT). The position will act as the TDIA program manager, which includes overseeing rulemaking, program development activities, and project selection. It will also develop recommendations to the Oregon Transportation Commission for allocating funds and will coordinate all reporting activities.

As previously mentioned, ODOT will receive 10 percent of auction proceeds through the TDIA to be used by the agency. The remaining 90 percent will go to local governments. Local governments must report annually to ODOT on use of these funds, and ODOT will work jointly with the GGRB to hire a third-party auditor for funded projects. ODOT assumes that the State Highway Fund will be used to cover expenses until other revenue is generated from the sale of allowances, at which point the State Highway Fund will be reimbursed.

Department of Justice

The Subcommittee approved an increase of \$455,597 Other Funds expenditure limitation and authorized the establishment of two permanent full-time positions (1.08 FTE) at the Department of Justice. The Personal Services total \$367,014 and the Services and Supplies total \$88,583. The authorized positions include one permanent full-time Senior Assistant Attorney General position (0.54 FTE), starting June 1, 2020 and assigned to the General Counsel Division - Natural Resources Section, and one permanent full-time Assistant Attorney General position (0.54 FTE) starting June 1, 2020 and assigned to the General Counsel Division - Business Activities Section. The revenue to support these positions will come from legal service hourly billing to state agencies.

Department of Administrative Services

The Subcommittee approved an increase of \$307,170 Other Funds expenditure limitation and one limited duration Operations and Policy Analyst 4 position and one State Procurement Analyst (1.25 FTE) in the Department of Administrative Services (DAS). The two limited duration positions would be hired to develop the model procurement program and conduct a study relating to emissions.

The Department, in consultation with the Attorney General, is directed to adopt model rules that specify labor, workforce and contracting procedures for state agencies to use in administering funds for projects that receive a certain amount of funding from the TDIA or CIF. DAS is also directed to develop a model program for procurement of zero-emission vehicles by local governments and special government bodies and conduct a study of how to account for greenhouse gas emissions when awarding state procurement contracts.

Legislative Revenue Office

The Subcommittee approved \$150,000 General Fund to the Legislative Revenue Office to contract with a third party to complete reports required by the measure.

PRELIMINARY

DETAIL OF JOINT COMMITTEE ON WAYS AND MEANS ACTION

Department of Administrative Services
Linnea Wittekind- 503-378-3108

DESCRIPTION	GENERAL FUND	LOTTERY FUNDS	OTHER FUNDS		FEDERAL FUNDS		TOTAL ALL FUNDS	POS	FTE
			LIMITED	NONLIMITED	LIMITED	NONLIMITED			
<u>SUBCOMMITTEE RECOMMENDATION</u>									
<u>Department of Environmental Quality</u>									
New SCR - Office of Greenhouse Gas Regulation & Oversight Board									
Personal Services	\$ 2,094,262	\$ -	\$ -	\$ -	\$ -	\$ -	2,094,262	19	10.29
Services and Supplies	\$ 4,384,708	\$ -	\$ -	\$ -	\$ -	\$ -	4,384,708		
SCR 001-00 - Air Quality									
Personal Services	\$ 723,443	\$ -	\$ -	\$ -	\$ -	\$ -	723,443	2	1.13
Services and Supplies	\$ 273,255	\$ -	\$ -	\$ -	\$ -	\$ -	273,255		
SCR 004-00 - Agency Management									
Personal Services	\$ 1,005,013	\$ -	\$ 126,472	\$ -	\$ -	\$ -	1,131,485	10	5.91
Services and Supplies	\$ 397,111	\$ -	\$ 19,250	\$ -	\$ -	\$ -	416,361		
<u>Oregon Business Development Department</u>									
SCR 210-00 - Business, Innovation & Trade Operations									
Services and Supplies	\$ 600,000	\$ -	\$ 500,000	\$ -	\$ -	\$ -	1,100,000		
Special Payments	\$ 9,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	9,500,000		
<u>Oregon Public Utility Commission</u>									
SCR 004 - Policy Administration									
Personal Services	\$ 29,566	\$ -	\$ 885,305	\$ -	\$ -	\$ -	914,871	8	3.75
Services and Supplies	\$ -	\$ -	\$ 409,475	\$ -	\$ -	\$ -	409,475		
Capital Outlay	\$ -	\$ -	\$ 55,000	\$ -	\$ -	\$ -	55,000		
<u>Housing and Community Services Department</u>									
SCR 010-00 - Stabilization Program									
Personal Services	\$ 114,749	\$ -	\$ -	\$ -	\$ -	\$ -	114,749	2	0.55
Services and Supplies	\$ 43,342	\$ -	\$ -	\$ -	\$ -	\$ -	43,342		
<u>Department of Land Conservation & Development</u>									
SCR 001-00 - Planning Program									
Personal Services	\$ 223,965	\$ -	\$ -	\$ -	\$ -	\$ -	223,965	2	1.25
Services and Supplies	\$ 103,197	\$ -	\$ -	\$ -	\$ -	\$ -	103,197		
<u>Department of Agriculture</u>									
SCR 040-00 - Natural Resource Policy									
Personal Services	\$ 89,876	\$ -	\$ -	\$ -	\$ -	\$ -	89,876	1	0.50
Services and Supplies	\$ 21,660	\$ -	\$ -	\$ -	\$ -	\$ -	21,660		
<u>Department of Forestry</u>									
SCR 050-50 - Harvest Tax									
Personal Services	\$ 109,215	\$ -	\$ -	\$ -	\$ -	\$ -	109,215	1	0.50
Services and Supplies	\$ 10,000	\$ -	\$ -	\$ -	\$ -	\$ -	10,000		

DESCRIPTION	GENERAL FUND	LOTTERY FUNDS	OTHER FUNDS		FEDERAL FUNDS		TOTAL ALL FUNDS	POS	FTE
			LIMITED	NONLIMITED	LIMITED	NONLIMITED			
<u>Department of Transportation</u>									
SCR 400-10 - Transportation Program Development									
Personal Services	\$ -	\$ -	\$ 118,072	\$ -	\$ -	\$ -	\$ 118,072	1	0.50
Services and Supplies	\$ -	\$ -	\$ 9,445	\$ -	\$ -	\$ -	\$ 9,445		
<u>Department of Justice</u>									
SCR 050-00 - General Counsel									
Personal Services	\$ -	\$ -	\$ 367,014	\$ -	\$ -	\$ -	\$ 367,014	2	1.08
Services and Supplies	\$ -	\$ -	\$ 88,583	\$ -	\$ -	\$ -	\$ 88,583		
<u>Department of Administrative Services</u>									
SCR 065-00 - Enterprise Goods & Services									
Personal Services	\$ -	\$ -	\$ 288,650	\$ -	\$ -	\$ -	\$ 288,650	2	1.25
Services and Supplies	\$ -	\$ -	\$ 18,520	\$ -	\$ -	\$ -	\$ 18,520		
<u>Legislative Revenue Office</u>									
SCR 001-00 - Legislative Revenue									
Services and Supplies	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 150,000		
SUBCOMMITTEE RECOMMENDATION	\$ 19,873,362	\$ -	\$ 2,885,786	\$ -	\$ -	\$ -	\$ 22,759,148	50	26.71

PRELIMINARY