

**CALIFORNIA PUBLIC UTILITIES COMMISSION  
DIVISION OF WATER AND AUDITS**

**Advice Letter Cover Sheet**

**Utility Name:** California American Water

**Date Mailed to Service List:** September 19, 2018

**District:** Sacramento District

**CPUC Utility #:** U210W

**Protest Deadline (20<sup>th</sup> Day):** October 9, 2018

**Advice Letter #:** 1214

**Review Deadline (30<sup>th</sup> Day):** October 19, 2018

**Tier**     1     2     3     Compliance

**Requested Effective Date:** January 1, 2019

**Authorization** D.15-04-007

**Rate Impact:** \$See AL  
See AL%

**Description:** Filing for Sacramento District Advice letter projects Chromium VI – Sacramento and Dunnigan (I15-600081 and I15-630001)

The protest or response deadline for this advice letter is 20 days from the date that this advice letter was mailed to the service list. Please see the "Response or Protest" section in the advice letter for more information.

**Utility Contact:** Kamilah Jones

**Utility Contact:** Melody Singh

**Phone:** 916-568-4232

**Phone:** 916-568-4246

**Email:** Kamilah.Jones@amwater.com

**Email:** Melody.Singh@amwater.com

**DWA Contact:** Tariff Unit

**Phone:** (415) 703-1133

**Email:** [Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

**DWA USE ONLY**

DATE

STAFF

COMMENTS

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\_\_\_\_\_

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\_\_\_\_\_

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\_\_\_\_\_

APPROVED

WITHDRAWN

REJECTED

**Signature:** \_\_\_\_\_

**Comments:** \_\_\_\_\_

**Date:** \_\_\_\_\_

\_\_\_\_\_



September 19, 2018

ADVICE LETTER NO. 1214

TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

California-American Water Company (“Cal-Am”) (U210W) hereby submits for review this advice letter including the following tariff sheets applicable to its Sacramento District which are attached hereto:

<u>C.P.U.C. Sheet No.</u>	<u>Title of Sheet</u>	<u>Canceling Sheet No.</u>
XXXX-W	Schedule No. SC-1 Sacramento District Tariff Area GENERAL METERED SERVICE	XXXX-W
XXXX-W	Schedule No. SC-1 (Continued) Sacramento District Tariff Area GENERAL METERED SERVICE	XXXX-W
XXXX-W	Schedule No. CA-LIRA Sacramento District Tariff Area LOW INCOME RATEPAYER ASSISTANCE SERVICE	XXXX-W
XXXX-W	Schedule No. SC-DU-1F Sacramento District Tariff Area - Dunnigan FLAT RATE SERVICE	XXXX-W
XXXX-W	Schedule No. SC-DU-1 (Continued) Sacramento District Tariff Area FLAT RATE SERVICE	XXXX-W
XXXX-W	TABLE OF CONTENTS (Continued) (Page 3)	XXXX-W
XXXX-W	TABLE OF CONTENTS (Continued) (Page 2)	XXXX-W
XXXX-W	TABLE OF CONTENTS (Continued) (Page 1)	XXXX-W

**Purpose:**

This advice letter filing requests the recovery of costs associated with Hexavalent Chromium treatment projects in the Sacramento (Project I15-600081) and Dunnigan (Project I15-630001) service areas. Specifically, California American Water (Cal-Am) seeks recovery of \$10,647,396 of capital and \$8,880 of annual incremental operating expenses. Cal-Am seeks recovery of the \$859,144 of incremental revenue requirement and expenses tracked in the Chromium 6 Memorandum Accounts through August 31, 2018, and recovery of \$1,390,271 in revenue related to total project costs in rates going forward effective January 1, 2019.

**Background:**

In August of 2013, as part of an ongoing rulemaking process, the California Department of Public Health (CDPH) proposed a maximum contaminant level (MCL) for hexavalent chromium (chrome-6) of 10 micro grams per liter. On November 14, 2013, Cal-Am filed Advice Letter (AL) 1020 seeking authority from the California Public Utilities Commission (CPUC) to establish a memorandum account to track Cal-Am's compliance costs for the final drinking water standard or MCL. On December 16, 2013, the CPUC authorized a Los Angeles Count and Sacramento Districts Chromium-6 Memorandum Accounts (Hexavalent Chromium) Memorandum Account. On April 15, 2014, the CDPH submitted a hexavalent chromium chrome-6 regulations package to the Office of Administrative Law (OAL) for review. On May 28, 2014 the OAL approved the regulations, establishing the MCL at 10 micro-grams per liter, which became effective on July 1, 2014.

Subsequent to the establishment of the MCL, CPUC Decision (D.) 15-11-012 authorized Cal-Am to purchase the public utility assets of Dunnigan Water Works and to consolidate the Dunnigan service territory with Cal-Am's Sacramento service area for ratemaking purposes. In this Decision the CPUC further provided authority to establish a memorandum account to track the costs of addressing hexavalent chromium in the Dunnigan service territory. On December 4, 2015, Cal-Am filed AL 1101 including the Dunnigan service area within the existing Chrome-6 Memo Account. This request was approved with an effective date of December 4, 2015. The approved memo account description provided that Dunnigan related improvements should be included within the Sacramento district filing.

Cal-Am's last general rate case (GRC) application was filed in July of 2016 as A.16-07-002. At that time the combined Sacramento and Dunnigan chrome-6 project details and costs had not been developed to a level sufficient for inclusion in that GRC. Specifically, as noted above the Dunnigan feasibility study was not finalized until October of 2016, more than 3 months after Cal-Am filed the 2016 GRC. Thus, Cal-Am could not have provided information sufficient to perform a reasonableness review in the 2016 GRC, could not have provided a reasonable forecast of costs, and could not have been certain that such costs would have been incurred starting January 1<sup>st</sup> of the 2018 test year. Thus, the combined Sacramento and Dunnigan chrome-6 projects were kept separate from the GRC filing with costs booked to the approved memorandum account.

On May 31, 2017, the Superior Court of Sacramento County issued a judgement invalidating the chrome-6 MCL, finding that CDPH failed to properly consider the economic feasibility of complying with the MCL. The court further ordered the State Water Board to adopt a new MCL for chrome-6. The chrome-6 MCL was eliminated as of September 11, 2017 and the State Water Board subsequently began the process of adopting a new MCL. At that time, the Board anticipated regulation development would take between 18 and 24 months.

In the period between the establishment of the MCL and the subsequent invalidation of the MCL Cal-Am moved forward with design and implementation of chrome-6 treatment projects in the Sacramento and Dunnigan service areas. In the period while a new MCL is promulgated the Board has encouraged public water systems that have already installed and operated the treatment systems, as Cal-Am has, to continue to operate these facilities.<sup>1</sup> Thus, as directed by the Board, Cal-Am will continue to operate the treatment facilities.

California-American Water Company submits this request to recover project costs for the Sacramento and Dunnigan Hexavalent Chromium Treatment projects. Project details and cost breakdown are provided in the Hexavalent Chromium – Sacramento and Dunnigan Project Completion Memoranda (Project Memo). As described in the memo account, and as further detailed below, Cal-Am is requesting a) inclusion of the revenue requirements for the authorized projects in rates going forward, and b) a surcharge to recover the incremental revenue requirement and expenses tracked in the memo accounts. Additionally, Cal-Am requests that the Chrome-6 memo account remain open to track incremental revenue requirement and expenses incurred for the period between September 1, 2018 and the effective date of this advice letter. This Advice Letter is designated as Tier 3 in compliance with the regulatory procedures outlined within the memo account.

### **Regulatory Procedures**

The chrome-6 memo account details “Regulatory Procedure” that must be followed in relation to this advice letter filing. Cal-Am has complied with the identified regulatory procedures as follows:

- a. Required Justifications
  - o Feasibility analyses are provided as California American Water: Hexavalent Chromium Treatment Implementation Study, dated May 5, 2015, and California American Water: Hexavalent Chromium Compliance Evaluation - Dunnigan Water System, dated October 7, 2016. These reports are provided as an attachment to the Project Memo.
- b. Recovery through Advice Letter Filing
  - o Cal-Am hereby files only one Tier 3 advice letter for the Sacramento/Dunnigan service areas.
  - o On June 29, 2018, when the final components of the project were nearing completion, and more than one month prior to this filing, Cal-Am alerted the CPUC’s Office of Ratepayer Advocates of this advice letter filing.
  - o Cal-Am requests (a) inclusion of the revenue requirements for the authorized projects in rates going forward; and (b) a surcharge to recover the incremental revenue requirements for the authorized projects in rates going forward. Revenue recovery is detailed below.
- c. Recovery in a GRC – Not applicable

### **Request:**

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<sup>1</sup>[https://pubapps.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/documents/chromium6/chrome\\_6\\_faqs.pdf](https://pubapps.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/chromium6/chrome_6_faqs.pdf). FAQ #3

In compliance with the Regulatory Procedures outlined in the memorandum account description, and assuming the requested effective date of January 1, 2019, Cal-Am hereby requests authorization for recovery as follows:

- a) **Inclusion of the revenue requirements for the authorized projects in rates going forward.** Cal-Am here by requests authorization to increase the rates in the Sacramento and Dunnigan service areas to reflect a revenue requirement increase of \$1,390,271 or 2.45% of currently authorized revenue requirement. D.15-11-012 approved consolidation of the Dunnigan service area with the Sacramento service area for ratemaking treatment. Cal-Am's pending GRC (A.16-07-002) has an unopposed request to consolidate Dunnigan rates with Sacramento rates, however the CPUC has not yet issued a Decision in this Application. Thus, in order to spread the costs of the Dunnigan related projects Cal-Am has spread requested costs based on service connections in the Sacramento and Dunnigan service areas.
- b) **A surcharge to recover the incremental revenue requirement and expenses tracked in the memo accounts.** Cal-Am here by requests authorization to recover the \$859,144 of incremental revenue requirement and expenses tracked in the memorandum account through August 31, 2018 via a surcharge of \$.0084 per 100 gallons for customers in the Sacramento County District and \$1.2286 per connection per month for customers in the Dunnigan service area.

Cal-Am further requests the Chrome-6 advice letter remain open to track incremental revenue requirement and operating expenses incurred between Sept 1<sup>st</sup>, 2018 through the effective date of the advice letter for reviewing in the next GRC filing.

**Tier Designation:**

Pursuant to the Regulatory Procedure provided in the approved memorandum account, this advice letter is submitted with a Tier 3 designation.

**Effective Date:**

California American Water requests an effective date of January 1, 2019.

**Notice:**

In accordance with Section 4.3 of General Order 96-B, a copy of this advice letter has been served upon all interested and affected parties as shown in Exhibit A.

In accordance with Section 4.2 of General Order 96-B, Cal-Am shall give affected customers at least 30 days notice before the requested effective date of January 1, 2019. Said notice will be provided via bill insert.

**RESPONSE OR PROTEST<sup>2</sup>**

Anyone may submit a response or protest for this AL. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

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<sup>2</sup> G.O. 96-B, General Rule 7.4.1

A **response** supports the filing and may contain information that proves useful to the Commission in evaluating the AL. A **protest** objects to the AL in whole or in part and must set forth the specific grounds on which it is based. These grounds<sup>3</sup> are:

1. The utility did not properly serve or give notice of the AL;
2. The relief requested in the AL would violate statute or Commission order, or is not authorized by statute or Commission order on which the utility relies;
3. The analysis, calculations, or data in the AL contain material error or omissions;
4. The relief requested in the AL is pending before the Commission in a formal proceeding; or
5. The relief requested in the AL requires consideration in a formal hearing, or is otherwise inappropriate for the AL process; or
6. The relief requested in the AL is unjust, unreasonable, or discriminatory, provided that such a protest may not be made where it would require relitigating a prior order of the Commission.
7. A protest may not rely on policy objections to an AL where the relief requested in the AL follows rules or directions established by statute or Commission order applicable to the utility. A protest shall provide citations or proofs where available to allow staff to properly consider the protest.

DWA must receive a response or protest via email (**or** postal mail) within 20 days of the date the AL is filed. When submitting a response or protest, **please include the utility name and advice letter number in the subject line.**

The addresses for submitting a response or protest are:

**Email Address:**

[Water.Division@cpuc.ca.gov](mailto:Water.Division@cpuc.ca.gov)

**Mailing Address:**

CA Public Utilities Commission  
Division of Water and Audits  
505 Van Ness Avenue  
San Francisco, CA 94102

On the same day the response or protest is submitted to DWA, the respondent or protestant shall send a copy of the protest to California American Water at:

**Email Address:**

[ca.rates@amwater.com](mailto:ca.rates@amwater.com)

**Mailing Address:**

4701 Beloit Drive  
Sacramento, CA 95838

[legalteamca@amwater.com](mailto:legalteamca@amwater.com)

555 Montgomery Street, Ste. 816  
San Francisco, CA 94111

[kamilah.jones@amwater.com](mailto:kamilah.jones@amwater.com)

4701 Beloit Drive  
Sacramento, CA 95838

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<sup>3</sup> G.O. 96-B, General Rule 7.4.2

Cities and counties that need Board of Supervisors or Board of Commissioners approval to protest should inform DWA, within the 20 day protest period, so that a late filed protest can be entertained. The informing document should include an estimate of the date the proposed protest might be voted on.

**REPLIES**<sup>4</sup>

The utility shall reply to each protest and may reply to any response. Any reply must be received by DWA within five business days after the end of the protest period, and shall be served on the same day on each person who filed the protest or response to the AL.

The actions requested in this advice letter are not now the subject of any formal filings with the California Public Utilities Commission, including a formal complaint, nor action in any court of law.

If you have not received a reply to your protest within 10 business days, contact this person at (916) 568-4232.

This filing will not cause the withdrawal of service, nor conflict with other schedules or rules.

CALIFORNIA-AMERICAN WATER COMPANY  
*/s/ Wes Owens*

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Wes Owens  
Engineering Manager, Asset Planning

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<sup>4</sup> G.O. 96-B, General Rule 7.4.3

Schedule SC-DU-1F  
Sacramento District Tariff Area- Dunnigan  
FLAT RATE SERVICE

Sheet 2

APPLICABILITY

Applicable to flat rate water service furnished on a monthly basis.

TERRITORY

Dunnigan, along both sides of Interstate 5, between County Roads 2 on the north and County Road 9 on the south, Yolo County.

RATES

	Per Service Connection	
	Per Month	
For each Mobile Home residential unit	\$28.92	(I)
For each Recreational Vehicle unit	\$28.92	
For Commercial Business Unit	\$28.92	(I)

SPECIAL CONDITIONS:

1. All bills are subject to the reimbursement fee set forth in Schedule No. UF.
2. A late charge will be imposed per Schedule No. CA\_FEES.
3. The above General Flat Rate Service applies to a service connection not larger than one-inch in diameter.
4. An additional single-family residential unit shall qualify for additional charge only if such a residential unit includes cooking and bathing facilities.
5. For service covered by the above classification, if the utility so elects, a meter shall be installed and service provided under Schedule No. SC-DU-1, General Metered Service, effective as of the first day of the following calendar month. Where the flat rate charge for a period has been paid in advance, refund of the prorated difference between such flat rate payment and the metered service charge for the same period shall be made on or before that day.



655 W. Broadway, Suite 1410

San Diego, CA 92101

Schedule SC-DU-1F (Continued)  
Sacramento District Tariff Area - Dunnigan  
FLAT RATE SERVICE

Sheet 3

**Surcharges and Fees:**

1. Per Advice Letter 1214, the balance accrued in the Sacramento Districts, including Dunnigan, Chromium-6 Memorandum Account through August 31, 2018 will be recovered through a surcharge of \$1.2286 per customer per month for a 12-month period. The effective date for the surcharge is January 1, 2019.

(N)  
|  
(N)

(Continued)

(TO BE INSERTED BY UTILITY)

ISSUED BY

(TO BE INSERTED BY C.P.U.C.)

Advice 1214

J. T. LINAM

Date Filed \_\_\_\_\_

Decision

DIRECTOR - Rates & Regulatory

Effective \_\_\_\_\_

Resolution \_\_\_\_\_

Schedule No. SC-1  
Sacramento District Tariff Area  
GENERAL METERED SERVICE

Sheet 1

APPLICABILITY

Applicable to all water furnished on a metered basis.

TERRITORY

The unincorporated communities, subdivisions, and adjacent areas generally known as Cordova, Rosemont, Parkway Estates, Lindale, Foothill Farms, Arlington Heights, Linwood, Loretto Heights, Arden Highlands, Arden Estates, Sunrise Security Park and Ox-Bow. A part of the City of Citrus Heights and the communities of Antelope and Sabre City in Sacramento and Placer counties. The city of Isleton and vicinity and the unincorporated community of Walnut Grove in Sacramento County. The lower southwestern portion of Placer County including the areas Known as Morgan Creek, Doyle Ranch, Sun Valley Oaks and Riolo Greens.

RATES

Quantity Rates:

	<u>Base Rate</u>	
	<u>Per 100 gal (CGL)</u>	
<b><u>Residential Customers:</u></b>		
For the first 142.1 CGL .....	\$0.4262	(l)
For all water delivered over 142.1 CGL .....	\$0.4645	(l)
<b><u>All Other Customers:</u></b>		
For all water delivered, per CGL .....	\$0.4341	(l)

Service Charge: General Metered

	<u>Per Meter</u>	
	<u>Per Month</u>	
For 5/8 x 3/4-inch meter.....	\$13.58	(l)
For 3/4-inch meter.....	\$20.37	
For 1-inch meter.....	\$33.96	
For 1-1/2-inch meter .....	\$67.92	
For 2-inch meter.....	\$108.67	
For 3-inch meter.....	\$203.75	
For 4-inch meter.....	\$339.58	
For 6-inch meter.....	\$679.17	
For 8-inch meter.....	\$1,086.66	
For 10-inch meter.....	\$1,562.08	
For 12-inch meter.....	\$2,241.25	(l)

The Service Charge is a readiness-to-serve charge which is applicable to all general metered services and to which is added the charge for water used computed at the Quantity Rates.

(Continued)

<u>(TO BE INSERTED BY UTILITY)</u>	<u>ISSUED BY</u>	<u>(TO BE INSERTED BY C.P.U.C.)</u>
Advice 1214	J. T. LINAM	Date Filed _____
Decision	DIRECTOR - Rates & Regulatory	Effective _____
		Resolution _____

Schedule No. SC-1 (Continued)  
Sacramento District Tariff Area  
GENERAL METERED SERVICE

Sheet 4

SPECIAL CONDITIONS:

8. Per Advice Letter 1187, a surcharge is applied to each bill to offset increases in purchased water costs imposed by the City of Sacramento. This offset results in a needed revenue increase of \$295,243 or 0.52%. The surcharge of \$0.0029 per 100 gallons is added to the quantity rate effective December 22, 2017.

9. Per Advice Letter 1214, the balance accrued in the Sacramento Districts Chromium-6 Memorandum Account through August 31, 2018 will be recovered through a quantity based surcharge of \$0.0084 per 100 gallons for a 12-month period. The effective date for the surcharge is January 1, 2019.

(N)  
|  
(N)

(Continued)

(TO BE INSERTED BY UTILITY)	ISSUED BY	(TO BE INSERTED BY C.P.U.C.)
Advice 1214	J. T. LINAM	Date Filed _____
Decision	DIRECTOR - Rates & Regulatory	Effective _____
		Resolution _____

Schedule No. CA-LIRA  
California American Water  
LOW INCOME RATEPAYER ASSISTANCE PROGRAM

Sheet 1

APPLICABILITY

Applicable to all water furnished on a metered basis.

TERRITORY

All territories served by California American Water Company

RATES:

**Northern Division:  
Sacramento District**

Quantity Rates:	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>	
For the first 142.1 CGL .....	\$0.3410	(l)
For all water delivered over 142.1 CGL .....	\$0.3716	(l)

Service Charge: General Metered

	<u>Per Meter</u> <u>Per Month</u>	
For 5/8 x 3/4-inch meter.....	\$10.87	(l)
For 3/4-inch meter.....	\$16.30	
For 1-inch meter.....	\$27.17	
For 1-1/2-inch meter .....	\$54.33	
For 2-inch meter.....	\$86.93	
For 3-inch meter.....	\$163.00	
For 4-inch meter.....	\$271.67	
For 6-inch meter.....	\$543.33	
For 8-inch meter.....	\$869.33	
For 10-inch meter.....	\$1,249.66	
For 12-inch meter.....	\$1,793.00	(l)

**Larkfield District**

Quantity Rates:	<u>Base Rate</u> <u>Per 100 gal (CGL)</u>
For the first 52.4 CGL .....	\$0.5954
For the next 52.4 CGL.....	\$0.6843
For the next 139.4 CGL.....	\$1.1108
For all water delivered over 243.9 CGL .....	\$1.4542

(Continued)

(TO BE INSERTED BY UTILITY)

ISSUED BY

(TO BE INSERTED BY C.P.U.C.)

Advice 1214  
Decision

J. T. LINAM  
DIRECTOR - Rates & Regulatory

Date Filed \_\_\_\_\_  
Effective \_\_\_\_\_  
Resolution \_\_\_\_\_

**SACRAMENTO DISTRICT SERVICE LIST  
CALIFORNIA-AMERICAN WATER COMPANY  
ADVICE LETTER 1214**

<b>EMAIL</b>		
<p>California Public Utilities Commission Division of Ratepayer Advocates dra_water_al@cpuc.ca.gov</p> <p>Citrus Heights Water District 6230 Sylvan Road Citrus Heights CA 95610 rchurch@chwd.org</p> <p>City of Sacramento, Water Division 1391 35th Avenue Sacramento CA 95822 dsherry@cityofsacramento.com</p> <p>Florin County Water District P.O. Box 292055 Sacramento CA 95829 fcwd@sbcglobal.net</p> <p>Amy Van City Clerk City of Citrus Heights 6237 Fountain Square Drive Citrus Heights CA 95621 avan@citrusheights.net</p> <p>Jim McCauley Clerk-Recorder Placer County 2954 Richardson Drive Auburn CA 95603 skasza@placer.ca.gov</p> <p>Linda Garcia City Clerk City of Isleton P.O. Box 716 Isleton CA 95641 lgarcia@cityofisleton.com</p>	<p>Lisa Blair California Public Utilities Commission Office of Ratepayer Advocates 505 Van Ness Avenue Room 3200 San Francisco CA 94102 lwa@cpuc.ca.gov</p> <p>Marvin Philo 3021 Nikol Street Sacramento CA 95826 mhphilo@aol.com</p> <p>Richard Rauschmeier California Public Utilities Commission ORA - Water Branch 505 Van Ness Avenue Room 4209 San Francisco CA 94102-3214 rra@cpuc.ca.gov</p> <p>Sarah E. Leeper VP - Legal, Regulatory CA American Water Co. 555 Montgomery St. Suite 816 San Francisco CA 94102 sarah.leeper@amwater.com</p> <p><b><u>MAIL</u></b></p> <p>CA Dept of Health Services Div of Drinking Water &amp; Environmental Mgt P.O. Box 997416 #Sacramento CA 95899-7413</p> <p>Fruitridge Vista Water Co. 1108 2nd St Sacramento CA 95814</p>	<p>Placer County Water Agency P.O. Box 6570 Auburn CA 95804</p> <p>Rio Linda Water District 730 L Street Rio Linda CA 95673</p> <p>Sacramento County WMD 827 7th Street, Room 301 Sacramento CA 95814</p> <p>Sacramento Suburban Water District 3701 Marconi Avenue Suite 100 Sacramento CA 95821-5303</p> <p>Anthony La Bouff County Counsel Placer County 175 Fulweiler Avenue Auburn CA 95603</p> <p>Carol Smith 6241 Cavan Drive, 3 Citrus Heights CA 95621</p> <p>Mark Norris County Clerk-Recorder County of Sacramento 600 8th Street Sacramento CA 95814</p> <p>Robert Baptiste 9397 Tucumcari Way Sacramento CA 95827-1045</p>

**SACRAMENTO DISTRICT SERVICE LIST**  
**CALIFORNIA-AMERICAN WATER COMPANY**  
**ADVICE LETTER 1214**

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Sacramento CA 95841

Walt Shannon  
8356 Auberry Drive  
Sacramento CA 95828

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