

State of Alaska FY2012 Governor's Operating Budget

Department of Law Regulatory Affairs Public Advocacy Component Budget Summary

Component: Regulatory Affairs Public Advocacy

Contribution to Department's Mission

The Regulatory Affairs and Public Advocacy (RAPA) Section exercises the Attorney General's responsibility to represent the public interest in regulatory affairs by performing the public advocacy function in utility and pipeline carrier matters before the Regulatory Commission of Alaska and providing policy analysis on related matters.

Core Services

- RAPA was established within the Department of Law to perform the Attorney General's public advocacy responsibility in utility and pipeline matters that come before the Regulatory Commission of Alaska (RCA). The Attorney General, as the Public Advocate, determines and advocates for the public interest with particular attention to the interests of consumers who would not otherwise have an effective voice regarding the rates and services of regulated utilities and pipeline operating in the state.
- RAPA represents the public interest in rate cases and other proceedings before the RCA, in court appeals, before the Legislature and other policymakers. The Attorney General utilizes the expert technical support of RAPA non-attorney professionals who provide accounting, engineering, economic and policy analysis for all types of regulated utilities and who prepare written testimony for hearing. Alaska's public advocate is a member of the National Association of State Utility Consumer Advocates.
- AS 42.05.254(e) and AS 42.06.286(a) provide for a funding mechanism directly from the regulatory cost charge that is administered by the RCA.

Key Component Challenges

RAPA has entered its sixth year of operation as a section in the Department of Law. RAPA's budgetary and personnel changes have been fundamentally integrated and implemented. RAPA continues to develop section standards and uniform procedures to enhance the effectiveness of our public advocacy efforts. An ongoing challenge has been successful recruitment to attract additional, necessary staff resources in the areas of economics and engineering. Continuing professional training for existent staff is an ongoing and long term priority.

During the upcoming fiscal year, RAPA will continue to represent the public interest on behalf of the Attorney General in proceedings before the Regulatory Commission of Alaska (RCA). RAPA will investigate public utility proposals that come before the Regulatory Commission of Alaska, file testimony and litigate the cases, and defend RAPA positions on appeal as appropriate. Two administrative appeals that RAPA defended in the Superior Court and the Alaska Supreme Court have been remanded to the RCA for further proceedings. The Alaska Supreme Court remanded to the RCA for further findings an appeal brought by the Municipality of Anchorage regarding the Anchorage Water and Wastewater Utility's attempt to include in rates a payment in lieu of taxes assessed on contributed plant. The RCA decision is pending. In an appeal brought by Fairbanks Sewer and Water d/b/a Golden Heart Utilities and College Utilities Corporation regarding implementation of various ratemaking adjustments that resulted in refunds to Fairbanks water and sewer ratepayers, the Superior Court ruled favorably on RAPA's points on cross appeal and remanded the case back to the RCA for further findings. The RCA decision is pending.

Significant Changes in Results to be Delivered in FY2012

No service changes are anticipated.

Major Component Accomplishments in 2010

The Department's work in regulatory affairs benefits the state's citizens by ensuring that matters before the Regulatory Commission of Alaska, such as utility rate changes or changes in service practices, conform to the public

interest. The approximate value to ratepayers of readily quantifiable instances of rate case advocacy by the Public Advocate in FY 10 is \$ 3.1 million. In addition to rate cases, the section participated in a gas utility case that resulted in a one-time \$5.7 million refund to customers due to the utility's billing errors over a number of years. To achieve these results the Department spent about \$1.5 million.

In FY 2010 the Attorney General issued two "Public Advocate Advisories" to inform Alaskan ratepayers about RAPA's efforts in significant proceedings before the RCA, and related topics. The periodic advisories often explain in summary form the ultimate outcome of an individual case in terms of rate increases or decreases that may be of particular interest to the public. This year, both Advisories alerted consumers to the outcome of contested cases in which consumer refunds resulted from RAPA advocacy: Fairbanks water and sewer utilities were ordered to refund customers the difference between interim rates that customers actually paid and the utility's final approved rates for 2007-2008 which the utilities estimate will increase refunds by \$1.2 million to a total refund of \$4.3 million. Also, see Eagle Utilities below.

During FY 2010, the section filed nineteen sets of comments or briefs in twelve dockets and pre-filed twenty-five sets of direct testimony in twenty-three dockets: five electric utility rate cases, five water utility rate cases, four sewer utility rate cases, three refuse utility rate cases, and three natural gas utility cases. RAPA also participated in ten evidentiary and consumer input hearings, and two public workshops.

1. Highlights of three of the cases that went to adjudicatory hearing are listed below:

- Anchorage Water and Wastewater Utilities (AWWU). After investigation and analysis, RAPA opposed AWWU's request for an 8.7% increase in water rates and a 7.97% increase in wastewater service rates. As a result of RAPA's advocacy, the RCA limited the rate increases to 5.57% for water service and 6.5% for wastewater service, respectively, a total reduction of approx. \$2.5 million to AWWU's request. This resulted in one-time refunds of approx. \$1.3 million to customers. Docket No. U-08-157/U-08-158.
- Enstar Natural Gas Company (Enstar). RAPA successfully opposed Enstar's request to include amounts in its 2009 gas cost adjustment (GCA) for its billing error of approx. \$5.7 million for gas deliveries to the Department of Defense (DOD) at Fort Richardson. The error related to incorrectly recorded usage volumes for DOD from 2004-2007, as a result of which DOD overpaid for gas supplied by third-party suppliers and transported by Enstar. RAPA advocated that applicable RCA regulations do not support the utility's request to recover the costs associated with the gas sales in prospective rate increases to its customers via the GCA because the cost elements were not beyond the control of the utility. The RCA ordered Enstar to refund the amounts overpaid by gas sales customers since 2009 but the method for dispensing the refunds is pending a Commission decision. Docket No. U-08-142.
- Homer Electric Association (HEA). RAPA successfully opposed HEA's intention to discontinue service to the Cook Inlet Aquaculture Association (CIAA). HEA had requested RCA approval of a special contract with CIAA for line extension maintenance service to the salmon hatchery operated by CIAA at Tutka Bay Lagoon. During the proceeding, HEA stated its intention to de-energize and remove CIAA's service line because of alleged safety hazards. The utility estimated that the costs to rebuild and replace the service line were prohibitive. RAPA filed legal briefing addressing HEA's duty to provide reasonably continuous service and outlining the process a utility must follow to seek discontinuation of service. Consequently, the RCA denied approval of HEA's special contract (which had expired by its own terms) and required the utility to continue to serve the hatchery at existing tariffed rates. Docket No. U-09-100.

2. The section also negotiated stipulated settlements in eleven dockets, two of which are highlighted below:

- Anchorage Water and Wastewater Utilities (AWWU). AWWU sought a 2.5% rate increase over the interim rates previously approved in Docket U-08-157/U-08-158. RAPA's analysis of the utility's filing determined that the utility had incorporated many of the ratemaking positions advocated by RAPA in previous cases and that the requested rate increase was reasonable, without the need for further litigation. The RCA accepted a stipulated settlement approving the 2.5% increase. Docket No. U-09-125/U-09-126.
- Eagle Utilities, Inc. (Eagle). Eagle sought a 22% rate increase for water services. RAPA filed direct testimony challenging various bases for the proposed amount of the increase, as a result of which the utility entered into a stipulated settlement that limited the increase to 14.96 %. The RCA accepted the settlement in full

resolution of the case. Docket No. U-09-034.

Statutory and Regulatory Authority

Executive Order 111 and SB 392

Contact Information
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**Regulatory Affairs Public Advocacy
Component Financial Summary**

All dollars shown in thousands

	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
Non-Formula Program:			
Component Expenditures:			
71000 Personal Services	1,111.1	1,098.1	1,132.8
72000 Travel	6.0	5.0	5.0
73000 Services	407.4	457.4	507.4
74000 Commodities	11.6	11.6	11.6
75000 Capital Outlay	1.2	1.2	1.2
77000 Grants, Benefits	0.0	0.0	0.0
78000 Miscellaneous	0.0	0.0	0.0
Expenditure Totals	1,537.3	1,573.3	1,658.0
Funding Sources:			
1141 RCA Receipts	1,537.3	1,573.3	1,658.0
Funding Totals	1,537.3	1,573.3	1,658.0

Estimated Revenue Collections

Description	Master Revenue Account	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
Unrestricted Revenues				
None.		0.0	0.0	0.0
Unrestricted Total		0.0	0.0	0.0
Restricted Revenues				
Alaska Public Utilities Comm. Receipts	51066	1,537.3	1,573.3	1,658.0
Restricted Total		1,537.3	1,573.3	1,658.0
Total Estimated Revenues		1,537.3	1,573.3	1,658.0

**Summary of Component Budget Changes
From FY2011 Management Plan to FY2012 Governor**

All dollars shown in thousands

	<u>Unrestricted Gen (UGF)</u>	<u>Designated Gen (DGF)</u>	<u>Other Funds</u>	<u>Federal Funds</u>	<u>Total Funds</u>
FY2011 Management Plan	0.0	1,573.3	0.0	0.0	1,573.3
Adjustments which will continue current level of service:					
-FY 2012 Personal Services increases	0.0	37.4	0.0	0.0	37.4
-FY 2011 Over/Understated GGU/SU salary adjustments	0.0	-2.7	0.0	0.0	-2.7
Proposed budget increases:					
-Increase RCA Receipts	0.0	50.0	0.0	0.0	50.0
FY2012 Governor	0.0	1,658.0	0.0	0.0	1,658.0

Regulatory Affairs Public Advocacy Personal Services Information				
Authorized Positions			Personal Services Costs	
	FY2011 Management Plan	FY2012 Governor		
Full-time	9	9	Annual Salaries	759,244
Part-time	0	0	COLA	8,417
Nonpermanent	0	0	Premium Pay	0
			Annual Benefits	394,042
			<i>Less 2.49% Vacancy Factor</i>	(28,903)
			Lump Sum Premium Pay	0
Totals	9	9	Total Personal Services	1,132,800

Position Classification Summary					
Job Class Title	Anchorage	Fairbanks	Juneau	Others	Total
Attorney IV	2	0	0	0	2
Attorney VI	1	0	0	0	1
Law Office Assistant I	2	0	0	0	2
Pub Advocate Util Analyst I	3	0	0	0	3
Pub Advocate Util Analyst II	1	0	0	0	1
Totals	9	0	0	0	9

Component Detail All Funds
Department of Law

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

	FY2010 Actuals	FY2011 Conference Committee (Final)	FY2011 Authorized	FY2011 Management Plan	FY2012 Governor	FY2011 Management Plan vs FY2012 Governor	
71000 Personal Services	1,111.1	1,090.0	1,098.1	1,098.1	1,132.8	34.7	3.2%
72000 Travel	6.0	5.0	5.0	5.0	5.0	0.0	0.0%
73000 Services	407.4	457.4	457.4	457.4	507.4	50.0	10.9%
74000 Commodities	11.6	11.6	11.6	11.6	11.6	0.0	0.0%
75000 Capital Outlay	1.2	1.2	1.2	1.2	1.2	0.0	0.0%
77000 Grants, Benefits	0.0	0.0	0.0	0.0	0.0	0.0	0.0%
78000 Miscellaneous	0.0	0.0	0.0	0.0	0.0	0.0	0.0%
Totals	1,537.3	1,565.2	1,573.3	1,573.3	1,658.0	84.7	5.4%
Fund Sources:							
1141 RCA Rcpts	1,537.3	1,565.2	1,573.3	1,573.3	1,658.0	84.7	5.4%
Unrestricted General (UGF)	0.0	0.0	0.0	0.0	0.0	0.0	0.0%
Designated General (DGF)	1,537.3	1,565.2	1,573.3	1,573.3	1,658.0	84.7	5.4%
Other Funds	0.0	0.0	0.0	0.0	0.0	0.0	0.0%
Federal Funds	0.0	0.0	0.0	0.0	0.0	0.0	0.0%
Positions:							
Permanent Full Time	10	9	9	9	9	0	0.0%
Permanent Part Time	0	0	0	0	0	0	0.0%
Non Permanent	0	0	0	0	0	0	0.0%

Change Record Detail - Multiple Scenarios With Descriptions
Department of Law

Component: Regulatory Affairs Public Advocacy (2764)

RDU: Civil Division (35)

Scenario/Change Record Title	Trans Type	Totals	Personal Services	Travel	Services	Commodities	Capital Outlay	Grants, Benefits	Miscellaneous	Positions		NP
										PFT	PPT	
***** Changes From FY2011 Conference Committee (Final) To FY2011 Authorized *****												
FY2011 Conference Committee	ConfCom	1,565.2	1,090.0	5.0	457.4	11.6	1.2	0.0	0.0	9	0	0
1141 RCA Rcpts		1,565.2										
ADN 0310033 FY 2011 Non-covered Salary Increase Year 1 SLA 10 Chapter 56 (HB 421) (Sec2 SLA10 CH41 P50 L24 (HB 300))	FisNot	8.1	8.1	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0
1141 RCA Rcpts		8.1										
: \$8.1												
Subtotal		1,573.3	1,098.1	5.0	457.4	11.6	1.2	0.0	0.0	9	0	0
***** Changes From FY2011 Authorized To FY2011 Management Plan *****												
Subtotal		1,573.3	1,098.1	5.0	457.4	11.6	1.2	0.0	0.0	9	0	0
***** Changes From FY2011 Management Plan To FY2012 Governor *****												
Increase RCA Receipts	IncM	50.0	0.0	0.0	50.0	0.0	0.0	0.0	0.0	0	0	0
1141 RCA Rcpts		50.0										
Increase direct funding from the Regulatory Commission of Alaska (RCA). Increased costs are being driven by increased use of expert consultants.												
FY 2012 Personal Services increases	SalAdj	37.4	37.4	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0
1141 RCA Rcpts		37.4										
This change record includes the following personal services increases: : \$37.4												
Alaska State Employees Assn (GGU) FY2012 Health Insurance Increased Costs : \$10.0												
Alaska Public Employees Assn (SU) FY2012 Health Insurance Increased Costs : \$1.9												
Non-Covered Employees FY2012 Health Insurance Increased Costs : \$5.8												
Alaska State Employees Association (GGU) FY 12 COLA increases : \$8.5												

Change Record Detail - Multiple Scenarios With Descriptions
Department of Law

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

Scenario/Change Record Title	Trans Type	Totals	Personal Services	Travel	Services	Commodities	Capital Outlay	Grants, Benefits	Miscellaneous	Positions		NP
										PFT	PPT	
Alaska Public Employees Association (SU) FY 12 COLA increases : \$2.8												
Non-Covered Employees FY 12 COLA increases : \$8.4												
FY 2011 Over/Understated GGU/SU salary adjustments												
1141 RCA Rcpts	SalAdj	-2.7	-2.7	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0
When the SU and GGU salary adjustments were calculated, errors were made that understated some GGU amounts and overstated some SU amounts. This change record identifies the over and under stated amounts associated with these calculations.: \$-2.7												
Totals		1,658.0	1,132.8	5.0	507.4	11.6	1.2	0.0	0.0	9	0	0

Personal Services Expenditure Detail
Department of Law

Scenario: FY2012 Governor (8665)
Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

PCN	Job Class Title	Time Status	Retire Code	Barg Unit	Location	Salary Sched	Range / Step	Comp Months	Split / Count	Annual Salaries	COLA	Premium Pay	Annual Benefits	Total Costs	GF Amount
03-0063	Law Office Assistant I	FT	A	GP	Anchorage	200	11C / D	12.0		36,112	0	0	27,837	63,949	0
03-0108	Attorney VI	FT	A	XE	Anchorage	AA	26K	12.0		117,288	2,996	0	54,036	174,320	0
03-0293	Attorney IV	FT	A	XE	Anchorage	AA	24J / K	12.0		104,702	2,802	0	50,421	157,925	0
03-0377	Attorney IV	FT	A	XE	Anchorage	AA	24F	12.0		97,860	2,619	0	48,106	148,585	0
08-6028	Pub Advocate Util Analyst I	FT	A	GP	Anchorage	200	22C / D	12.0		77,450	0	0	41,821	119,271	0
08-6045	Pub Advocate Util Analyst II	FT	A	SS	Anchorage	200	24L / M	12.0		113,519	0	0	53,136	166,655	0
08-6071	Pub Advocate Util Analyst I	FT	A	GP	Anchorage	200	22J	12.0		89,820	0	0	46,006	135,826	0
08-6073	Pub Advocate Util Analyst I	FT	A	GP	Anchorage	200	22G	12.0		86,244	0	0	44,796	131,040	0
08-6079	Law Office Assistant I	FT	A	GP	Anchorage	200	11C / D	12.0		36,249	0	0	27,883	64,132	0

Total														Total Salary Costs:	759,244		
Positions														Total COLA:	8,417		
New														Total Premium Pay:	0		
Deleted														Total Benefits:	394,042		
Full Time Positions:	9	0	0														
Part Time Positions:	0	0	0														
Non Permanent Positions:	0	0	0														
Positions in Component:	9	0	0														
Total Component Months:	108.0																
														Total Pre-Vacancy:	1,161,703		
														Minus Vacancy Adjustment of 2.49%:	(28,903)		
														Total Post-Vacancy:	1,132,800		
														Plus Lump Sum Premium Pay:	0		
														Personal Services Line 100:	1,132,800		

PCN Funding Sources:	Pre-Vacancy	Post-Vacancy	Percent
1141 RCA Receipts	1,161,703	1,132,800	100.00%
Total PCN Funding:	1,161,703	1,132,800	100.00%

Note: If a position is split, an asterisk (*) will appear in the Split/Count column. If the split position is also counted in the component, two asterisks (**) will appear in this column. [No valid job title] appearing in the Job Class Title indicates that the PCN has an invalid class code or invalid range for the class code effective date of this scenario.

Line Item Detail
Department of Law
Travel

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

Line Number	Line Name		FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
72000	Travel		6.0	5.0	5.0
Expenditure Account	Servicing Agency	Explanation	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
72000 Travel Detail Totals			6.0	5.0	5.0
72110	Employee Travel (Instate)	Attorney travel to provide counsel for departments and agencies of state government, including hearings, board meetings and legal counsel in court cases. Investigations and taking depositions for court actions.	0.9	5.0	5.0
72410	Employee Travel (Out of state)	Travel costs for conferences and meetings.	5.1	0.0	0.0

**Line Item Detail
Department of Law
Services**

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

Line Number	Line Name		FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
73000	Services		407.4	457.4	507.4
Expenditure Account			FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
73000 Services Detail Totals			407.4	457.4	507.4
73025	Education Services		5.6	6.0	6.0
73050	Financial Services		1.0	5.1	5.1
73050	Financial Services	Administrative Services	8.1	8.1	8.1
73075	Legal & Judicial Svc		242.9	248.3	298.3
73156	Telecommunication		10.0	10.0	10.0
73225	Delivery Services		1.0	1.0	1.0
73675	Equipment/Machinery		4.0	4.0	4.0
73750	Other Services (Non IA Svcs)		40.0	40.0	40.0
73804	Economic/Development (IA Svcs)	Administrative Services	36.0	36.0	36.0
73805	IT-Non-Telecommnctns	Administrative Services	9.3	32.9	32.9
73805	IT-Non-Telecommnctns	Enterprise Technology Services	5.9	11.1	11.1
73806	IT-Telecommunication	Enterprise Technology Services	14.9	24.7	24.7
73809	Mail	Central Mail	0.7	1.1	1.1

Line Item Detail
Department of Law
Services

Component: Regulatory Affairs Public Advocacy (2764)

RDU: Civil Division (35)

Expenditure Account		Servicing Agency	Explanation	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
73000 Services Detail Totals				407.4	457.4	507.4
73811	Building Leases	Leases	RSA Administration, GS&S - Leased Office Space - Anchorage AG's Office.	27.3	27.6	27.6
73814	Insurance	Risk Management	RSA Administration, Risk Management	0.2	0.4	0.4
73815	Financial	Finance	RSA Administration, Finance Chargeback (AKSAS / AKPAY)	0.4	0.9	0.9
73816	ADA Compliance	Americans With Disabilities	RSA Labor, Americans With Disabilities Act.	0.1	0.2	0.2

Line Item Detail
Department of Law
Commodities

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

Line Number	Line Name		FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
74000	Commodities		11.6	11.6	11.6
Expenditure Account	Servicing Agency	Explanation	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
74000 Commodities Detail Totals			11.6	11.6	11.6
74200	Business	Library materials including Alaska Statutes, Alaska Code, Advanced Legislative Service and Court Rules; subscriptions, office supplies; software applications, printer cartridges, paper and misc. data processing supplies; computer supplies - desktop refresh, non-capital.	11.6	11.6	11.6

Line Item Detail
Department of Law
Capital Outlay

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

Line Number	Line Name		FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
75000	Capital Outlay		1.2	1.2	1.2
Expenditure Account	Servicing Agency	Explanation	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
		75000 Capital Outlay Detail Totals	1.2	1.2	1.2
75830	Info Technology	Computer equipment, printers and modems.	1.2	1.2	1.2

Restricted Revenue Detail
Department of Law

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

Master Account	Revenue Description	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
51066	Alaska Public Utilities Comm. Receipts	1,537.3	1,573.3	1,658.0

Detail Information

Revenue Amount	Revenue Description	Component	Collocation Code	AKSAS Fund	FY2010 Actuals	FY2011 Management Plan	FY2012 Governor
51066	APUC Rec AS 42.05&06 Direct funding from the Regulatory Commission of Alaska (RCA) for expert technical support of RAPA non-attorney professionals who provide accounting, engineering, economic and policy analysis for all types of regulated utilities and preparation of written testimony for hearings.	Reg Comm of AK	03211400	11100	1,537.3	1,573.3	1,658.0

Inter-Agency Services
Department of Law

Component: Regulatory Affairs Public Advocacy (2764)
RDU: Civil Division (35)

Expenditure Account	Service Description	Service Type	Servicing Agency	FY2011			
				FY2010 Actuals	Management Plan	FY2012 Governor	
73050	Financial Services	Timekeeping administration and support.	Intra-dept	Administrative Services	8.1	8.1	8.1
				73050 Financial Services subtotal:	8.1	8.1	8.1
73804	Economic/Development (IA Svcs)	RSA Community & Economic Development - contractual and administrative costs (building lease, parking, telephones, long distance, faxes, postage and machinery & equipment)	Inter-dept	Administrative Services	36.0	36.0	36.0
				73804 Economic/Development (IA Svcs) subtotal:	36.0	36.0	36.0
73805	IT-Non-Telecommnctns	RSA Law, Administration - Information Services & Procurement support.	Intra-dept	Administrative Services	9.3	32.9	32.9
73805	IT-Non-Telecommnctns	RSA Administration, ETS - Computer Services EPR	Inter-dept	Enterprise Technology Services	5.9	11.1	11.1
				73805 IT-Non-Telecommnctns subtotal:	15.2	44.0	44.0
73806	IT-Telecommunication	RSA Administration, ETS -Telecommunication EPR.	Inter-dept	Enterprise Technology Services	14.9	24.7	24.7
				73806 IT-Telecommunication subtotal:	14.9	24.7	24.7
73809	Mail	RSA Administration, Central Mailroom	Inter-dept	Central Mail	0.7	1.1	1.1
				73809 Mail subtotal:	0.7	1.1	1.1
73814	Insurance	RSA Administration, Risk Management	Inter-dept	Risk Management	0.2	0.4	0.4
				73814 Insurance subtotal:	0.2	0.4	0.4
73815	Financial	RSA Administration, Finance Chargeback (AKSAS / AKPAY)	Inter-dept	Finance	0.4	0.9	0.9
				73815 Financial subtotal:	0.4	0.9	0.9
73816	ADA Compliance	RSA Labor, Americans With Disabilities Act.	Inter-dept	Americans With Disabilities	0.1	0.2	0.2
				73816 ADA Compliance subtotal:	0.1	0.2	0.2
				Regulatory Affairs Public Advocacy total:	75.6	115.4	115.4
				Grand Total:	75.6	115.4	115.4