

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION E-5334

July 11, 2024

R E S O L U T I O N

Resolution E-5334. Southern California Edison Company's Amended and Restated Mid-Term Reliability Contract with Silver State South Storage, LLC.

PROPOSED OUTCOME:

- Approves Southern California Edison's Mid-Term Reliability contract with Silver State South Storage, LLC., for a total of 200 megawatts (MW) of nameplate capacity expected to begin delivery on June 1, 2025.

SAFETY CONSIDERATIONS:

- SCE's Technology Neutral Pro Forma Contract requires the Seller to operate the energy storage facility in accordance with "Prudent Electrical Practices." See Section 6.01(a) of SCE's Technology Neutral Pro Forma Contract.
- SCE's Technology Neutral Pro Forma Contract also includes a provision providing that, prior to commencement of any construction activities on the project site, the seller must provide to SCE a report from an independent engineer certifying that the seller has a written plan for the safe construction and operation of the project in accordance with Prudent Electrical Practices.

ESTIMATED COST:

- Contract costs are confidential at this time.

By Advice Letter 5257-E filed on March 25, 2024 and 5257-E-A filed on April 10, 2024.

SUMMARY

This resolution approves Southern California Edison's (SCE) Mid-Term reliability (MTR) contract with Silver State South, LLC for 200 megawatts (MWs) of nameplate capacity (referred herein as the MTR Contract). The MTR Contract is a Resource Adequacy (RA) with Financial Settlement contract for a new in-front-of-the meter (IFOM) energy storage

project: the Silver State South Storage project. The initial contract signed by SCE for this project was not previously brought to the Commission for approval due to interconnection delays identified shortly after execution. The initial contract has been amended and restated to address interconnection delays to maintain the projects' viability. The MTR contract will provide incremental September net qualifying capacity (NQC) to meet SCE's 2024 MTR procurement requirements pursuant to Ordering Paragraph (OP) 1 of the decision. This resolution approves the requested relief in Advice Letter (AL) 5257-E.

BACKGROUND

On June 24, 2021, the Commission adopted D. 21-06-035. This decision required load serving entities (LSEs) to procure at least their share of 11,500 MW of September net qualifying capacity (NQC), with at least 2,000 MW NQC online by August 1, 2023; an additional 6,000 MW online by June 1, 2024; an additional 1,500 MW online by June 1, 2025; and an additional 2,000 MW of long lead time resources online by June 1, 2026, for MTR purposes. This procurement requirement is inclusive of a minimum of 2,500 MW of zero-emitting capacity required to be online by 2025, to replace capacity retiring at Diablo Canyon Power Plant (Diablo Canyon).

As documented in Table 6 of the decision, of the 11,500 MW (all MW references hereafter are to NQC) procurement order, SCE is assigned 3,948 MWs for its bundled service customer portion, with 687 MW to be online by August 1, 2023; 2,070 MW by June 1, 2024; 515 MW by June 1, 2025; and 687 MW of long-lead time (LLT) resources by 2026. Due to the deregistration of two community choice aggregators (CCAs); Western Community Energy (WCE) and the City of Baldwin Park; SCE's total procurement requirement increased to 4,052 MW, with 705 MW to be online by August 1, 2023; 2,114 MW by June 1, 2024; 529 MW by June 1, 2025; and 705 MW LLT resources 2026. These revised totals include a minimum of 880 MW zero-emitting capacity by 2025. The MTR Decision also requires that all contracts with resources (including imports), used to satisfy the MTR requirements shall have a minimum duration of 10 years, and provides that the Investor-Owned Utilities (IOUs) are authorized to seek cost recovery for most of their MTR procurement capacity (with the exception of pumped storage or utility-owned resources) through Tier 3 ALs.¹

On February 23, 2023, the Commission subsequently adopted D.23-02-040, which required supplemental MTR procurement of 4,000 MW of September NQC, with 2,000 MW to be procured by June 1, 2026, and another 2,000 MW by June 1, 2027. SCE's share of this

¹ OP 13 in [D.21-06-035](#) at 97

procurement is 684 MW for 2026 and 684 MW for 2027. The Commission also extended the online date for LLT resource procurement from June 1, 2026, to June 1, 2028.²

Overview of SCE's Midterm Reliability Procurement Process

SCE launched its Phase 1 MTR Request for Offers (RFO) on July 30, 2021, for incremental resources that can come online in the 2023 through 2024 timeframe. SCE's MTR RFO sought incremental zero-emitting resources or resources that otherwise meet Renewable Portfolio Standard (RPS) eligibility requirements that provide RA benefits. SCE also expressed a preference for preferred and energy storage resources located in disadvantaged communities (DACs) and expressed a preference for larger projects.

SCE notes that it utilized least-cost-best-fit (LCBF) principles in the evaluation process for the Phase 1 MTR RFO. This methodology considers both quantitative and qualitative attributes associated with offers to arrive at the best value and most cost-effective solution for customers that meet the identified incremental RA needs.

SCE utilized a net present value (NPV) method in performing its quantitative assessment of offers. An NPV methodology entails forecasting (1) the project benefits and costs over the life of the offer; (2) applying time value of money (3) estimating the net present value as the present value of the benefits minus the present value of the costs; and (4) normalizing the ranking of each offer by an NPV metric. The NPV metric used in the MTR RFO is NPV per MTR compliance kW-month.

SCE also assessed the nonquantifiable characteristics of each offer by performing an analysis of the qualitative attributes of each project during both the shortlist and final selection processes.

SCE engaged Sedway Consulting Inc. (Sedway Consulting) as the Independent Evaluator (IE) to oversee the MTR RFO. SCE notes that Sedway Consulting was involved in the review of MTR RFO documents, reviewed SCE's offer valuation process, conducted its own independent evaluation, participated in numerous conference calls and negotiation sessions, and reviewed email exchanges and other documents exchanged by SCE and bidders. Sedway Consulting also participated in the Procurement Review Group (PRG) communications. Sedway Consulting provided a report (the IE Report) on the MTR RFO, which is included in the AL filing.

SCE states that in conjunction with the IE it considered each offer's qualitative components along with quantitative results during both the shortlist and final selection processes.

² OP 2 [in D.23-02-040](#) at 87

As a result of SCE's Phase 1 MTRRFO, SCE has submitted seven advice letters seeking approval of contracts to meet SCE's 2023 and 2024 MTR procurement requirements, which have already been approved by the Commission.³ SCE originally executed an RA with Put Option contract for the Silver State South Storage project on December 20, 2022, with an expected initial delivery date of June 1, 2024. Shortly after execution, and before SCE submitted the contract for Commission approval, the project received information that interconnection facilities work would delay the project beyond 2024.

SCE and the seller renegotiated this amended and restated MTR Contract for the Silver State South Storage project to be a RA with Financial Settlement contract and amend the expected initial delivery date to June 1, 2025. SCE intends to count the amended and restated MTR Contract for the Silver State South Storage project toward its 2024 MTR procurement requirement and to procure bridge resources to fill the shortfall caused by the delay in the Silver State South Storage project's online date. SCE states that it considered its MTR procurement needs and the other resources available as well as the status of the Silver State South project in working to execute the Silver State South Amendments. The amended contract terms and conditions are confidential.

SCE further states it used LCBF metrics to compare bids received in their Phase 1 MTR RFO to the amended Silver State South contract, and concluded that, despite the contract changes, the Silver State South project compare favorably to the other bids received.

SCE consulted with its Procurement Review Group regarding the MTR Contract on December 21, 2023.

On March 25, 2024, SCE filed Tier 3 AL 5257-E requesting approval of amended and restated MTR contract. The Silver State South Storage project will be a transmission-connected, 4-hour duration, lithium-ion battery energy storage resource that will share a point of interconnection with a solar resource. The project will be developed by NextEra Energy Resources and will interconnect with the CAISO-controlled grid at the Primm 220kV Substation. It will have a 200 MW nameplate capacity and be located in Jean, Nevada. SCE provides the following summary table of MTR Contract:

Table 1.

³ See Appendix A for a listing of these Advice Letters

Seller/Project Name	Technology Type	Contract Type	Expected Delivery Period	Name Plate Capacity	Contract ELCC Value for Midterm Reliability (“MTR”) Compliance
Silver State South Storage, LLC / Silver State South Storage	Energy Storage	RA w/ Financial Settlement	6/1/2025 - 5/30/2040	200 MW	181 MW

SCE states that energy storage sellers are responsible for the safe construction and operation of their facilities and compliance with all applicable safety regulations. SCE’s Technology Neutral Pro Forma Contract, which was used for the MTR contract, requires the seller to operate the energy storage facility in accordance with “Prudent Electrical Practices.”⁴⁵ The Contract also include a provision providing that, prior to commencement of any construction activities on the project site, the seller must provide to SCE a report from an independent engineer certifying that the seller has a written plan for the safe construction and operation of the project in accordance with Prudent Electrical Practices.⁶

SCE proposes to allocate the costs associated with the MTR Contract to applicable customers, which includes bundled service customers and departing load customers with 2021 vintage cost responsibility, using the Portfolio Allocation Balancing Account (PABA) in accordance with SCE’s Advice 4589-E. SCE notes that pursuant to Advice 4589-E, costs and benefits associated with procurement complying with the Decision will be recovered from applicable customers through the 2021 vintage sub-account of the PABA and include incremental administrative costs, which include, but are not limited to, the IE costs.⁷

⁴ SCE AL 5257-E at 18 (describing Prudent Electrical Practices as, “those practices, methods and acts that would be implemented and followed by prudent operators of electric energy storage facilities in the Western United States, similar to the Project, during the relevant time period, which practices, methods and acts, in the exercise of prudent and responsible professional judgment in the light of the facts known or that should reasonably have been known at the time the decision was made, could reasonably have been expected to accomplish the desired result consistent with good business practices, reliability and safety”); Section 6.01(a) of SCE’s Technology Neutral Pro Forma Contract.

⁵ Section 6.01(a) of SCE’s Technology Neutral Pro Forma Contract.

⁶ Section 4.01(d) of SCE’s Technology Neutral Pro Forma Contract.

⁷ SCE AL 5257-E at 18

SCE Advice Letter Request

In AL 5257-E, SCE requests that the Commission adopt a resolution no later than July 11, 2024, containing the following:

- 1) Approval of the MTR Contract in its entirety;
- 2) A finding that the MTR Contract is consistent with the Decision;
- 3) A finding that the MTR Contract is for a total of approximately 181 MW of expected incremental September NQC for purposes of MTR compliance;
- 4) A finding that the MTR Contract and SCE's entry into it, is reasonable and prudent for all purposes, and that any payments to be made by SCE pursuant to the MTR Contract are recoverable in full by SCE through the PABA, subject only to SCE's prudent administration of the MTR Contract;
- 5) Authorization for SCE to allocate the benefits and costs of the MTR Contract to all applicable customers via the PABA; and
- 6) Any other and further relief as the Commission finds just and reasonable.

NOTICE

Notice of AL 5257-E was made by publication in the Commission's Daily Calendar. Southern California Edison Company states that a copy of AL 5257-E was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

No protests were filed to AL 5257-E.

DISCUSSION

The Commission has reviewed SCE AL 5257-E and finds that SCE's request for approval of the MTR contract presented in AL 5257-E is reasonable, as discussed below.

Consistency with D.21-06-035

We find that SCE AL 5257-E is consistent with D.21-06-035. As directed in the decision, SCE filed a Tier 3 AL seeking approval for cost recovery for the MTR contract described herein.

The Agreement is for 200 MW of nameplate capacity, with an expected online date of June 1, 2025. In AL 5257-E, SCE states that intends to count the amended and restated MTR Contract for the Silver State South Storage project toward its 2024 MTR procurement requirement and to procure bridge resources to fill the shortfall caused by the delay in the Silver State South Storage project's online date.

Additionally, the MTR Contract is for a 15-year term and thus satisfies the 10-year or more delivery term requirement.⁸

Procurement Methodology, Evaluation, and Cost Reasonableness

SCE issued its MTR RFO on July 30, 2021 to solicit offers to procure incremental resources with expected online dates of August 1, 2023 and June 1, 2024 to meet its MTR procurement requirements.

SCE retained Sedway Consulting as the IE for its MTR solicitation efforts, which participated in and undertook a number of activities in connection with the solicitation process. In the IE Report provided in Attachment D of AL 5257-E concludes "that SCE administered its shortlisting and final offer evaluation and selection processes fairly and procured the best resources/contracts for addressing its MTR needs."⁹

SCE consulted the PRG regularly throughout the MTR RFO process, beginning with its announcement regarding the MTR RFO launch, on July 28, 2021. It most recently consulted the PRG regarding the amended and restated MTR Contract on December 21, 2023.

The Commission has reviewed SCE 's initial bid evaluation analysis, its refreshed LCBF and the IE Report (provided in confidential Attachments C and D). We agree with SCE that the amended and restated contract compares favorably to other bids received in its Phase I RFO and represents a viable LCBF solution for SCE to help meet a portion of its 2024 MTR requirements. We find that SCE has conducted a robust, competitive solicitation with reasonable bid evaluation methodology and appropriately consulted the PRG throughout

⁸ D.21-06-035 at 70.

⁹ 5257-E Attachment D at 21

the MTR RFO process. The amended and restated MTR contract is reasonable based on the competitive solicitation and bid evaluation methodology.

Cost Recovery

The MTR Decision authorized cost recovery of the MTR procurement via the power charge indifference adjustment (PCIA):

“To the extent that any resources procured in response to this order are subject to allocation using the power charge indifference adjustment (PCIA), the date of that adjustment shall be vintaged by the date of this order. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company shall each file Tier 2 advice letters to update their balancing accounts to address the PCIA treatment as a result of this order.”¹⁰

SCE submitted Advice Letter 5307-E on October 14, 2021 to account for the MTR procurement requirements and cost recovery associated with the transfer of Western Community Energy customers’ load to SCE’s bundled service. Pursuant to Energy Division’s acceptance of Advice Letter 5307-E,¹¹ costs and benefits associated with procurement complying with the MTR Decision are recovered from applicable customers through the 2021 vintage sub-account of the PABA and include incremental administrative costs.¹²

SCE proposes to allocate the costs associated with the MTR Contracts and incremental administrative costs (which include, but are not limited to, the IE costs) to applicable customers, which includes bundled service customers and departing load customers with 2021 vintage cost responsibility, using the PABA.

We find that SCE’s proposed cost recovery of the MTR Contract to be consistent with OP 12 of the MTR Decision and Energy Division’s approval of SCE AL 5307-E.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days’ public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission’s website and in accordance

¹⁰ OP 12 in [D.21-06-035](#) at 97.

¹¹ SCE AL 4589-E became effective on October 16, 2021.

¹² Includes, but is not limited to, Independent Evaluator costs.

with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution were neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments on June 6, 2024. No party provided comments on the draft resolution.

FINDINGS

1. In June 2021, D.21-06-035 directed Load Serving Entities to procure 11,500 megawatts (MW) of incremental September net qualifying capacity under the Commission's IRP purview over the course of four years, with 2,000 MW to be online by August 1, 2023, an additional 6,000 MW online by June 1, 2024, an additional 1,500 MW online by June 1, 2025, and an additional 2,000 MW online by June 1, 2026. Subsequent decisions expanded this procurement order.
2. In June 2021, D.21-06-035 ordered the three large IOUs to file Tier 3 Advice Letters to request cost recovery for any procurement conducted as a result of the decision, except if the procurement is associated with a pumped storage resource or a utility-owned resource, for which full applications are required.
3. By Advice Letter (AL) 5257-E, filed on March 25th, 2024, SCE has submitted for approval an amended and restated energy storage contract (MTR contract) with Silver State South Storage, LLC.
4. The MTR contract is intended to help SCE meet a portion of its 2024 MTR requirements.
5. The MTR Contract is an RA with Financial Settlements contract for 200 megawatts of nameplate capacity.
6. SCE's methodology to evaluate the bids in the Phase I MTR competitive solicitation that resulted in the amended and restated MTR contract, presented in SCE AL 5257-E, is consistent with the MTR Decision, D.21-06-035.
7. SCE's request to allocate the benefits and costs of the MTR Contract to all applicable customers via the 2021 vintage sub-account PABA, including incremental administrative costs, is reasonable.
8. SCE's proposed cost recovery of the MTR Contract in SCE AL 5257-E is reasonable and consistent with D.21-06-035 OP 12 and Energy Division's approval of SCE AL 4589-E.

THEREFORE, IT IS ORDERED THAT:

1. The request of Southern California Edison for approval of the amended and restated MTR contract with Silver State South LLC., as requested in Advice Letter 5257-E, is approved.
2. Southern California Edison's request to allocate the benefits and costs of the MTR Contracts to all applicable customers via the 2021 vintage sub-account of SCE's Portfolio Allocation Balancing Account, including incremental administrative costs, is approved.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on July 11, 2024; the following Commissioners voting favorably thereon:

/s/ RACHEL PETERSON
Rachel Peterson
Executive Director

ALICE REYNOLDS
President

DARCIE HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
MATTHEW BAKER
Commissioners

APPENDIX A

SCE Mid-Term Reliability Contracts Filed to Date							
Advice Letter and Resolution	Advice Letter Approval Date	Seller and Project Name	Technology Type	Contract Type	Expected Delivery Period	Name Plate Capacity	Contract ELCC Value for MTR Compliance
AL 4739-E, Resolution E-5205	May 19, 2022	AES Alamitos BESS II	Energy Storage	RA w/Put	8/1/2023-7/31/2043	82 MW	79 MW
		Calpine Santa Ana III	Energy Storage	RA Only	8/1/2023-7/31/2038	40 MW	39 MW
		LS Power Gateway	Energy Storage	RA Only	8/1/2023-7/31/2038	75 MW	72 MW
		Tenaska/Facon Energy Condor	Energy Storage	RA Only	6/1/2024-5/31/2039	200 MW	181 MW
		Tenaska/Falcon Energy Peregrine	Energy Storage	RA Only	6/1/2024-5/31/2039	100 MW	91 MW
AL 4800-E, Resolution E-5225	August 25, 2022	NextEra Desert Peak Energy Storage II, LLC	Energy Storage	RA w/Put	8/1/2023-7/31/2038	75 MW	72 MW

SCE Mid-Term Reliability Contracts Filed to Date							
Advice Letter and Resolution	Advice Letter Approval Date	Seller and Project Name	Technology Type	Contract Type	Expected Delivery Period	Name Plate Capacity	Contract ELCC Value for MTR Compliance
AL 4850-E, Resolution E-5234	November 4, 2022	174 Power/ Total Energies Silver Peak Solar, LLC – Silver Peak II Project	Energy Storage	RA w/Put	8/1/2023-7/31/2033	109 MW	105 MW
					6/1/2024-5/31/2034		99 MW
		174 Power/ Total Energies Silver Peak Solar, LLC – Silver Peak III Project	Energy Storage	RA Only	8/1/2023-7/31/2033	110 MW	106 MW
					6/1/2024-5/31/2034		100 MW
		174 Power/ Total Energies Silver Peak Solar, LLC – Silver Peak PV Project	Solar PV	Entire Output	6/1/2024-5/31/2034	7 MW	N/A
		AES McFarland Solar A, LLC – McFarland Solar A Project	Energy Storage	RA Only	6/1/2024-5/31/2038	100 MW	91 MW
		Hecate Grid Humidor Storage 115 LLC	Energy Storage	RA Only	6/1/2024-5/31/2039	115 MW	104 MW

SCE Mid-Term Reliability Contracts Filed to Date							
Advice Letter and Resolution	Advice Letter Approval Date	Seller and Project Name	Technology Type	Contract Type	Expected Delivery Period	Name Plate Capacity	Contract ELCC Value for MTR Compliance
AL 4885-E, Resolution E-5251	December 9, 2022	Calpine Nova I	Energy Storage	RA w/ Put	6/1/2024-5/31/2039	230 MW	208.6 MW
		Calpine Nova II	Energy Storage	RA w/ Put	6/1/2024-5/31/2039	230 MW	208.6 MW
		Next Era Proxima RA Storage	Energy Storage	RA Only	6/1/2024-5/31/2039	90 MW	82 MW
		WPower Stanton	Energy Storage	RA Only	8/1/2023-7/30/2033	69 MW	66 MW
AL 4920-E, Resolution E-5253	February 23, 2023	Clearway Arica	Energy Storage	RA Only	6/1/2024-5/31/2039	15 MW	14 MW
		Clearway Rosamond	Energy Storage	RA Only	6/1/2024-5/31/2039	147 MW	133 MW
		Gridstor Santa Fe Springs	Energy Storage	RA Only	6/1/2024-5/31/2039	90 MW	82 MW
		Gridstor Upland	Energy Storage	RA Only	6/1/2024-5/31/2039	120 MW	109 MW
		Tenaska/Falcon Energy Condor	Energy Storage	RA Only	6/1/2024-5/31/2039	200 MW	181.4 MW
		Tenaska/Falcon Energy Peregrine	Energy Storage	RA Only	6/1/2024-5/31/2039	100 MW	90.7 MW

SCE Mid-Term Reliability Contracts Filed to Date							
Advice Letter and Resolution	Advice Letter Approval Date	Seller and Project Name	Technology Type	Contract Type	Expected Delivery Period	Name Plate Capacity	Contract ELCC Value for MTR Compliance
AL 4990-E, Resolution E-5271	June 8, 2023	Leeward AVEP BESS, LLC	Energy Storage	RA w/ Put	6/1/2024-5/31/2039	126 MW	114 MW
		MN8 Energy American Kings	Energy Storage	RA Only	6/1/2024-5/31/2039	73.8 MW	67 MW
		AES McFarland Solar B	Energy Storage	RA Only	6/1/2024-5/31/2034	150 MW	136 MW
		AES Raceway	Energy Storage	RA Only	6/1/2024-5/31/2037	80 MW	73 MW
		Calpine Nova IV	Energy Storage	RA w/Put	9/1/2024-8/31/2039	110 MW	100 MW
		TerraGen Sanborn	Energy Storage	RA Only	8/1/2023-7/31/2038	85 MW	82 MW
AL 5127-E, Draft Resolution E-5307	February 15, 2024	AES Alamitos 2 Amendment	Energy Storage	RA Only	6/1/2024-5/31/2044	82 MW	78.97 MW
		RWE Ventasso Contract	Energy Storage	RA Only	6/1/2024 - 5/31/2039	50 MW	45 MW

SCE Mid-Term Reliability Contracts Filed to Date							
Advice Letter and Resolution	Advice Letter Approval Date	Seller and Project Name	Technology Type	Contract Type	Expected Delivery Period	Name Plate Capacity	Contract ELCC Value for MTR Compliance
AL 5155-E, Draft Resolution E-5309	Pending Commission Voting Meeting on March 21, 2024	AES McFarland Storage C, LLC	Energy Storage	RA w/ Financial Settlement	6/1/2025-5/31/2045	185 MW	139 MW
		ASHUSA Mordor ES1, LLC	Energy Storage	RA w/ Financial Settlement	4/1/2025-3/31/2040	25 MW	19 MW
		ASHUSA Mordor ES2, LLC	Energy Storage	RA w/ Financial Settlement	4/1/2025-3/31/2040	20 MW	15 MW
		TransGrid Atlas VII, LLC	Energy Storage	RA Only	6/1/2025-5/31/2040	300 MW	225 MW
		TransGrid Atlas VIII, LLC	Energy Storage	RA Only	6/1/2026-5/31/2046	382.4 MW	293 MW
		TransGrid Atlas IX, LLC	Energy Storage	RA Only	6/1/2025-5/31/2040	150 MW	113 MW
		AES Bellefield 1	Energy Storage	RA Only	6/1/2026-5/31/2041	500 MW	383 MW
AL 5257-E, Draft Resolution 5334	Pending Commission Voting Meeting on July 11, 2024	NextEra Energy Desert Peak Energy Silver State South Storage, LLC	Energy Storage	RA w/ Financial Settlement	6/1/2025-5/31/2040	200 MW	181 MW
Total Capacity						4523.20	4106.27