

State of Alaska
FY2011 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 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 fifth 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. Ongoing challenges include successful recruitment to attract additional, necessary staff resources in the areas of economics and engineering. In addition, 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. Recently, 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. 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.

Significant Changes in Results to be Delivered in FY2011

No service changes are anticipated.

Major Component Accomplishments in 2009

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 quantifiable instances of advocacy by the Public Advocate in FY 09 is \$ 4.0 million. To achieve this result the Department spent about \$1.5 million.

In FY 2009 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 (See below: Enstar Natural Gas Co.; Adak Telephone Utility).

During FY 2009, the section filed twenty-three sets of comments or briefs in fifteen dockets and pre-filed nine sets of direct testimony in eight dockets: one electric utility rate cases, one water utility rate cases, five refuse utility rate cases, and one natural gas utility case. RAPA also participated in eleven evidentiary and consumer input hearings, and three public workshops.

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

- Enstar Natural Gas Company (Enstar). RAPA successfully opposed Enstar’s claim that it was not required to pay customer refunds dating back to 2003 when the RCA approved rate design changes filed by the gas utility. Under state law, customers who qualify for utility service under two different rate schedules should always receive the more advantageous rate. (Alaska Statute 42.05.371) Therefore, customers who qualified for service under the two different rate schedules should have been given the lower tariff rate. Enstar took no action to modify its tariff so that customers would not qualify for more than one rate. The RCA ordered Enstar to refund all qualifying customers the difference between small commercial rates and residential rates in effect since May 2003. Enstar refunded approx. \$700,000 to 984 eligible customer accounts but appealed its obligation to make any further payments. The appeal is pending.
- Potter Creek Water Company (PCWC). Based upon RAPA advocacy opposing PCWC’s requested 128.7% rate increase for water service, the Commission limited the rate increase to 28%. Consequently, the RCA ordered total customer refunds plus applicable interest in the amount of \$20,247. The method of dispensing the refund (lump sum or payments) is pending a decision by the RCA.

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

- Adak Telephone Company (Adak). After filing direct testimony and responding to RAPA discovery, Adak stipulated with RAPA to a 57% reduction in permanent rates and related refunds to consumers of approx. \$56,000.
- Fairbanks Natural Gas (FNG). This docket was opened by the RCA to investigate FNG’s exemption from rate regulation. RAPA filed testimony recommending, among other things, rate protection for residential customers. FNG stipulated with RAPA to provide price protection to FNG’s captive residential customers, and the utility was conditionally allowed to remain exempt from full rate regulation.
- Lausen’s Dependable Disposal, Inc. (Lausen). After discovery and filing of RAPA’s direct testimony challenging the utility’s justification, Lausen stipulated to withdraw its requested 15% rate increase for refuse services and provide refunds ranging from \$17 to \$38 per customer depending upon the customer’s number of weekly pick-ups.

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

	FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
Non-Formula Program:			
Component Expenditures:			
71000 Personal Services	1,108.6	1,111.1	1,067.3
72000 Travel	10.4	6.0	6.0
73000 Services	183.3	407.4	457.4
74000 Commodities	31.2	11.6	11.6
75000 Capital Outlay	0.0	1.2	1.2
77000 Grants, Benefits	0.0	0.0	0.0
78000 Miscellaneous	0.0	0.0	0.0
Expenditure Totals	1,333.5	1,537.3	1,543.5
Funding Sources:			
1141 RCA Receipts	1,333.5	1,537.3	1,543.5
Funding Totals	1,333.5	1,537.3	1,543.5

Estimated Revenue Collections

Description	Master Revenue Account	FY2009 Actuals	FY2010 Conference Committee	FY2010 Authorized	FY2010 Authorized	FY2011 Governor
Unrestricted Revenues						
None.		0.0	0.0	0.0	0.0	0.0
Unrestricted Total		0.0	0.0	0.0	0.0	0.0
Restricted Revenues						
Alaska Public Utilities Comm. Receipts	51066	1,333.5	0.0	0.0	1,537.3	1,543.5
Restricted Total		1,333.5	0.0	0.0	1,537.3	1,543.5
Total Estimated Revenues		1,333.5	0.0	0.0	1,537.3	1,543.5

**Summary of Component Budget Changes
From FY2010 Management Plan to FY2011 Governor**

All dollars shown in thousands

	<u>General Funds</u>	<u>Federal Funds</u>	<u>Other Funds</u>	<u>Total Funds</u>
FY2010 Management Plan	0.0	0.0	1,537.3	1,537.3
Adjustments which will continue current level of service:				
-FY2011 Health Insurance Cost Increase Non-Covered Employees	0.0	0.0	6.2	6.2
FY2011 Governor	0.0	0.0	1,543.5	1,543.5

Regulatory Affairs Public Advocacy Personal Services Information				
Authorized Positions			Personal Services Costs	
	FY2010 Management Plan	FY2011 Governor		
Full-time	10	9	Annual Salaries	723,601
Part-time	0	0	Premium Pay	0
Nonpermanent	0	0	Annual Benefits	344,665
			<i>Less 0.09% Vacancy Factor</i>	(966)
			Lump Sum Premium Pay	0
Totals	10	9	Total Personal Services	1,067,300

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)

	FY2009 Actuals	FY2010 Conference Committee	FY2010 Authorized	FY2010 Management Plan	FY2011 Governor	FY2010 Management Plan vs FY2011 Governor	
71000 Personal Services	1,108.6	1,111.1	1,111.1	1,111.1	1,067.3	-43.8	-3.9%
72000 Travel	10.4	6.0	6.0	6.0	6.0	0.0	0.0%
73000 Services	183.3	406.9	407.4	407.4	457.4	50.0	12.3%
74000 Commodities	31.2	11.6	11.6	11.6	11.6	0.0	0.0%
75000 Capital Outlay	0.0	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	1,333.5	1,536.8	1,537.3	1,537.3	1,543.5	6.2	0.4%
Fund Sources:							
1141 RCA Rcpts	1,333.5	1,536.8	1,537.3	1,537.3	1,543.5	6.2	0.4%
General 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%
Other Funds	1,333.5	1,536.8	1,537.3	1,537.3	1,543.5	6.2	0.4%
Positions:							
Permanent Full Time	10	10	10	10	9	-1	-10.0%
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 FY2010 Conference Committee To FY2010 Authorized *****												
FY2010 Conference Committee												
	ConfCom	1,536.8	1,111.1	6.0	406.9	11.6	1.2	0.0	0.0	10	0	0
1141 RCA Rcpts		1,536.8										
ADN 0300019 DOA funding transfer for ETS increased costs in FY2010												
	Atrin	0.2	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0	0	0
1141 RCA Rcpts		0.2										
Pursuant to Section 1, Chapter 12, SLA 2009, page 4 - lines 6-12, \$97,200 is distributed to state agencies in order to pay service costs charged by the Department of Administration, Enterprise Technology Services for enterprise technology services.												
The amounts transferred to state agencies from ETS are as follows:												
DCED, \$8.0; Revenue, \$23.9; Law, \$3.6; Labor, \$26.4; DNR, \$2.9; H&SS, \$17.2; Administration, \$15.2.												
ADN 0300020 DOA funding transfer for Centralized Personnel Services increased costs in FY2010												
	Atrin	0.3	0.0	0.0	0.3	0.0	0.0	0.0	0.0	0	0	0
1141 RCA Rcpts		0.3										
Pursuant to Section 1, Chapter 12, SLA 2009, page 2 - line 29-31, page 3 - line 3, \$66,400 is distributed to state agencies in order to pay service costs charged by the Department of Administration, Division of Personnel for centralized personnel services.												
The amounts transferred to state agencies from Division of Personnel is as follows:												
DCED, \$12.3; Revenue, \$7.3; Law, \$5.3; Labor, \$12.1; H&SS, \$21.9; Administration, \$7.5.												
Subtotal		1,537.3	1,111.1	6.0	407.4	11.6	1.2	0.0	0.0	10	0	0
***** Changes From FY2010 Authorized To FY2010 Management Plan *****												
Subtotal		1,537.3	1,111.1	6.0	407.4	11.6	1.2	0.0	0.0	10	0	0
***** Changes From FY2010 Management Plan To FY2011 Governor *****												
Transfer to bring component within allowable personal services vacancy factor												
	LIT	0.0	-50.0	0.0	50.0	0.0	0.0	0.0	0.0	0	0	0
Transfer of funds between line items to bring component within the allowable personal services vacancy factor.												
FY2011 Health Insurance Cost Increase Non-Covered Employees												
	SalAdj	6.2	6.2	0.0	0.0	0.0	0.0	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	
1141 RCA Rcpts		6.2										
Costs associated with Health Insurance Increases.: \$6.2												
Delete Vacant PCN 08-6065 Public Advocate Utility Analyst I												
PosAdj		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-1	0	0
Delete PCN 08-6065, vacant Anchorage Public Advocate Utility Analyst I, to meet current Enterprise-wide position count requirements.												
Totals		1,543.5	1,067.3	6.0	457.4	11.6	1.2	0.0	0.0	9	0	0

Personal Services Expenditure Detail
Department of Law

Scenario: FY2011 Governor (7749)
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 Month	Split / Count	Annual Salaries	COLA	Premium Pay	Annual Benefits	Total Costs	GF Amount
03-0063	Law Office Assistant I	FT	A	GP	Anchorage	2A	11B	12.0		33,684	0	0	22,472	56,156	0
03-0108	Attorney VI	FT	A	XE	Anchorage	AA	26K	12.0		114,984	0	0	50,373	165,357	0
03-0293	Attorney IV	FT	A	XE	Anchorage	AA	24J	12.0		99,540	0	0	45,795	145,335	0
03-0377	Attorney IV	FT	A	XE	Anchorage	AA	24E / F	12.0		94,761	0	0	44,223	138,984	0
08-6028	Pub Advocate Util Analyst I	FT	A	GP	Anchorage	2A	22B / C	12.0		72,602	0	0	35,272	107,874	0
08-6045	Pub Advocate Util Analyst II	FT	A	SS	Anchorage	2A	24L	12.0		106,620	0	0	46,107	152,727	0
08-6065	Pub Advocate Util Analyst I	FT	W	GP	Anchorage	2A	22A / B	12.0		0	0	0	0	0	0
08-6071	Pub Advocate Util Analyst I	FT	A	GP	Anchorage	2A	22G / J	12.0		85,013	0	0	39,354	124,367	0
08-6073	Pub Advocate Util Analyst I	FT	A	GP	Anchorage	2A	22F / G	12.0		82,713	0	0	38,597	121,310	0
08-6079	Law Office Assistant I	FT	A	GP	Anchorage	2A	11B	12.0		33,684	0	0	22,472	56,156	0
													Total Salary Costs:	723,601	
													Total COLA:	0	
													Total Premium Pay:	0	
													Total Benefits:	344,665	
													Total Pre-Vacancy:	1,068,266	
													Minus Vacancy Adjustment of 0.09%:	(966)	
													Total Post-Vacancy:	1,067,300	
													Plus Lump Sum Premium Pay:	0	
													Personal Services Line 100:	1,067,300	

PCN Funding Sources:	Pre-Vacancy	Post-Vacancy	Percent
1141 RCA Receipts	1,068,266	1,067,300	100.00%
Total PCN Funding:	1,068,266	1,067,300	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		FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
72000	Travel		10.4	6.0	6.0
Expenditure Account	Servicing Agency	Explanation	FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
72000 Travel Detail Totals			10.4	6.0	6.0
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.	5.4	6.0	6.0
72410	Employee Travel (Out of state)		5.0	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		FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
73000	Services		183.3	407.4	457.4
Expenditure Account	Servicing Agency	Explanation	FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
73000 Services Detail Totals			183.3	407.4	382.4
73025	Education Services	Conferences, training, memberships	6.3	6.0	6.0
73050	Financial Services	Private consultant fees	0.0	5.1	5.1
73075	Legal & Judicial Svc	Legal counsel, expert witness, hearing officer, court report transcripts and other case costs.	108.8	165.1	183.1
73156	Telecommunication	Local Service, long distance toll charges and cellular phones paid to third party telephone utilities.	0.5	10.0	10.0
73225	Delivery Services	Freight and messenger services. Movement of materials, exhibits, legal documents and courier services.	0.5	1.0	1.0
73675	Equipment/Machinery	Rentals/Leases and Repairs/Maintenance of office equipment - copiers & postage meters.	0.0	4.0	4.0
73750	Other Services (Non IA Svcs)	Printing forms, briefs and legal notices.	8.8	40.0	40.0
73804	Economic/Development (IA Svcs)	Administrative Services RSA Community & Economic Development - contractual and administrative costs (building lease, parking, telephones, long distance, faxes, postage and machinery & equipment)	0.0	36.0	36.0
73805	IT-Non-Telecommnctns	Administrative Services RSA Law, Administration - Information Services & Procurement support.	12.0	26.0	26.0
73805	IT-Non-Telecommnctns	Enterprise Technology Services RSA Administration, ETS - Computer Services EPR	5.5	13.5	14.9
73806	IT-Telecommunication	Enterprise Technology Services RSA Administration, ETS -Telecommunication EPR.	12.4	20.1	20.9
73809	Mail	Central Mail RSA Administration, Central Mailroom	0.6	1.3	1.3
73811	Building Leases	Leases RSA Administration, GS&S - Leased Office Space - Anchorage AG's Office.	27.1	73.5	28.3

Line Item Detail
Department of Law
Services

Component: Regulatory Affairs Public Advocacy (2764)

RDU: Civil Division (35)

Expenditure Account	Servicing Agency	Explanation	FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
73000 Services Detail Totals			183.3	407.4	382.4
73812	Legal	Administrative Services RSA Law, Administrative Services - Timekeeping Administration	0.0	4.0	4.0
73814	Insurance	Risk Management RSA Administration, Risk Management	0.2	0.4	0.4
73815	Financial	Finance RSA Administration, Finance Chargeback (AKSAS / AKPAY)	0.5	1.2	1.2
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		FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
74000	Commodities		31.2	11.6	11.6
Expenditure Account	Servicing Agency	Explanation	FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
74000 Commodities Detail Totals			31.2	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.	31.2	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		FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
75000	Capital Outlay		0.0	1.2	1.2
Expenditure Account			FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
	Servicing Agency	Explanation			
75000 Capital Outlay Detail Totals			0.0	1.2	1.2
75830	Info Technology	Computer equipment, printers and modems.	0.0	1.2	1.2

Restricted Revenue Detail
Department of Law

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

Master Account	Revenue Description	FY2009 Actuals	FY2010 Management Plan	FY2011 Governor
51066	Alaska Public Utilities Comm. Receipts	1,333.5	1,537.3	1,543.5

Detail Information

Revenue Amount	Revenue Description	Component	Collocation Code	AKSAS Fund	FY2009 Actuals	FY2010 Management Plan	FY2011 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	1,333.5	1,537.3	1,543.5

Inter-Agency Services
Department of Law

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

Expenditure Account	Service Description	Service Type	Servicing Agency	FY2009 Actuals	FY2010		
					Management Plan	FY2011 Governor	
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	0.0	36.0	36.0
73804 Economic/Development (IA Svcs) subtotal:					0.0	36.0	36.0
73805	IT-Non-Telecommnctns	RSA Law, Administration - Information Services & Procurement support.	Intra-dept	Administrative Services	12.0	26.0	26.0
73805	IT-Non-Telecommnctns	RSA Administration, ETS - Computer Services	Inter-dept	Enterprise Technology Services	5.5	13.5	14.9
73805 IT-Non-Telecommnctns subtotal:					17.5	39.5	40.9
73806	IT-Telecommunication	RSA Administration, ETS -Telecommunication EPR.	Inter-dept	Enterprise Technology Services	12.4	20.1	20.9
73806 IT-Telecommunication subtotal:					12.4	20.1	20.9
73809	Mail	RSA Administration, Central Mailroom	Inter-dept	Central Mail	0.6	1.3	1.3
73809 Mail subtotal:					0.6	1.3	1.3
73812	Legal	RSA Law, Administrative Services - Timekeeping Administration	Intra-dept	Administrative Services	0.0	4.0	4.0
73812 Legal subtotal:					0.0	4.0	4.0
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	0.5	1.2	1.2
73815 Financial subtotal:					0.5	1.2	1.2
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:					31.3	102.7	104.9
Grand Total:					31.3	102.7	104.9