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May 15, 2002

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

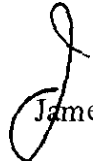
*In the Matter of the Application of Laclede Gas Company for an
Accounting Authority Order, Case No. GA-2002-429*

Dear Mr. Roberts:

Enclosed for filing with the Commission are the originals and requisite copies of the Direct Testimony of Michael R. Spotanski filed on behalf of Laclede Gas Company.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

Enclosures

cc: Office of the Public Counsel
Dana K. Joyce, General Counsel
Counsel of Record

Exhibit No.:	Weather AAO
Issue:	Michael R. Spotanski
Witness:	Direct Testimony
Type of Exhibit:	Laclede Gas Company
Sponsoring Party:	GA-2002-429
Case No.:	

LACLEDE GAS COMPANY

DIRECT TESTIMONY

OF

MICHAEL R. SPOTANSKI

May 15, 2002

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Laclede
Gas Company for an Accounting Authority Order
Authorizing the Company to Defer for Future Recovery
Consideration its Just and Reasonable Costs of Providing
Public Utility Service that would otherwise be Un-
recovered due solely to the Extraordinary Impact of
Record Warm Weather on the Company's Operations

Case No. GA-2002-429

AFFIDAVIT

STATE OF MISSOURI)

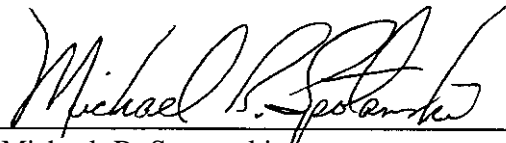
CITY OF ST. LOUIS)

Michael R. Spotanski, of lawful age, being first duly sworn, deposes and states:

1. My name is Michael R. Spotanski. My business address is 720 Olive Street, St. Louis, Missouri 63101; and I am Vice President-Finance of Laclede Gas Company.

2. Attached hereto and made a part hereof for all purposes is my direct testimony, consisting of pages to , including Schedules.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.


Michael R. Spotanski

Subscribed and sworn to before me this **W** Ay of May, 2002.



PATRICIA P. HICKS
Notary Public - Notary Seal
STATE OF MISSOURI
City of St. Louis
My Commission Expires: June 27, 2002

DIRECT TESTIMONY OF MICHAEL R. SPOTANSKI

1
2
3 Q. Please state your name and business address.

4 A. My name is Michael R. Spotanski, and my business address is 720 Olive Street,
5 St. Louis, Missouri 63101.

6 Q. By whom are you employed and in what capacity?

7 A. I am employed by Laclede Gas Company ("Laclede" or "Company") in the
8 position of Vice President-Finance. In this capacity, I am responsible for the
9 Company's accounting, customer accounting, budgeting, financial planning, and
10 management information reporting functions.

11 Q. How long have you held your current position?

12 A. I was elected to my current position in December 2000.

13 Q. What is your professional experience with Laclede prior to assuming your current
14 position?

15 A. I joined Laclede in 1981 as a Staff Auditor and held various positions in the
16 Company's Internal Audit and Finance departments. In 1988, I was promoted to
17 Manager of Financial Planning. In that position, I had responsibility for the
18 financial aspects of rate case analyses, various financial forecasts and monitoring
19 regulatory trends and developments. In 1992, I was named Senior Rate Analyst
20 in the Gas Supply and Regulatory Affairs Department. My primary
21 responsibilities in that position included the preparation and submission of cost of
22 service studies for use in allocating the Company's costs of providing utility
23 service in general rate proceedings. I became Manager of Gas Supply Planning in
24 1996 in which I assumed responsibility for developing and reviewing various

1 components of the Company's gas supply planning and procurement process. I
2 was then promoted to the position of Assistant to the President in 1998 and in
3 1999 to the position of Assistant Vice President-Finance. I held that position until
4 being elected to my current position in December 2000.

5 Q. What is your educational background?

6 A. I received a Bachelor of Science degree in Accounting from Southern Illinois
7 University at Carbondale in 1982.

8 Q. Have you previously submitted testimony before this Commission?

9 A. Yes. I have filed testimony in a number of Commission proceedings relating to
10 cost of service and gas supply matters, including GR-90-120, GR-92-165, GR-92-
11 314, GR 94-220, GR-96-193, GR-98-374, and GA-99-107/GA-99-236.

12 **Purpose of Testimony**

13 Q. What is the purpose of your direct testimony in this proceeding?

14 A. The purpose of my direct testimony is to explain the application which was filed
15 by Laclede on March 8, 2002, for an accounting authority order ("AAO")
16 authorizing it to defer and book certain costs of service to Account 182 for
17 recovery consideration in Laclede's pending rate case proceeding, Case No. GR-
18 2002-356. Specifically, I will address Laclede's request to defer and recover
19 those Commission-approved costs of service that have been incurred by the
20 Company to provide public utility service and that would otherwise be
21 unrecovered due solely to the negative impact of extraordinarily warm weather on
22 the Company's revenues throughout the period from October 1, 2001 to March 31,
23 2002.

1 Q. How is your direct testimony divided?

2 A. The first section of my testimony will address the specific nature of the
3 authorization requested by the Company, including the costs of service which it
4 seeks to defer and recover; the method used to quantify those costs of service, and
5 the Company's proposal for how such costs of service would be reflected in future
6 rates. The second section of my testimony will explain why the authorization
7 requested by the Company is fully consistent with the criteria previously
8 employed by the Commission for granting AAOs. Finally, my testimony will
9 address why such authorization is so important if the Company is to have the
10 financial resources required to fulfill its public utility obligations. Indeed, this
11 issue has only grown in importance given the termination of the Company's
12 highly successful Gas Supply Incentive Program ("GSIP"), and the recent
13 downgrades that the Company has received in its credit ratings due in large part to
14 the impact of weather and various regulatory policies on the Company.

15 **The Requested Authorization and Proposed Method of Recovery**

16 Q. Are the costs of service which Laclede seeks to defer and recover unknown or
17 uncertain at this time?

18 A. No. As the Company indicated in its Verified Application, all of the costs of
19 service which Laclede seeks to defer and recover in its pending general rate case
20 proceeding, Case No. GR-2002-356, are costs that the Commission has already
21 determined to be just and reasonable and necessary for the provision of utility
22 service. Specifically, these are all costs that were approved as reasonable by the
23 Commission in the Company's last general rate case proceeding, Case No. GR-

1 2001-629, after an extensive audit by the Commission Staff and review by other
2 parties.

3 Q. Does the Company's AAO request seek to defer and recover any increases that
4 have occurred in these costs since the conclusion of Case No. GR-2001-629?

5 A. No. It only seeks to defer and recover the specific cost levels that were reflected
6 in rates in Case No. GR-2001-629 as a result of the Commission's approval of the
7 Unanimous Stipulation and Agreement filed in that case. These cost levels were
8 based on amounts that the Company was incurring at the time of that proceeding.
9 The Company is only seeking to defer and recover the portion of these approved
10 cost levels as of that period that would otherwise remain unrecovered solely due
11 to the extraordinary impact of the exceptionally warm weather event experienced
12 last winter. Accordingly, the Company is not seeking to defer and recover any
13 increases in these costs that may have occurred since the conclusion of Case No.
14 GR-2001-629. Such cost increases are, instead, being addressed in the
15 Company's pending general rate case proceeding, Case No. GR-2002-356.

16 Q. Has the Company updated the magnitude of its recovery shortfall since it filed its
17 Application?

18 A. Yes. Because the Company's AAO Application was filed on March 8, 2002, the
19 Company did not have a final quantification of the impact of weather on its
20 recovery of these costs for the entire period from October 1, 2001 to March 31,
21 2002. That information is now available.

22 Q. What is the final quantification?

1 A. Based on actual weather data for the entire period from October 1, 2001 to March
2 31, 2002, the Company experienced a cost of service recovery shortfall of
3 \$10,849,000 solely due to the exceptionally warm weather experienced over that
4 period. The calculation of this cost of service recovery shortfall is set forth in
5 Schedule 1 to my direct testimony. It is this amount that the Company seeks to
6 defer and recover in Case No. GR-2002-356.

7 Q. How has the Company calculated the under-recovery of costs caused by the
8 extraordinary weather event of this past winter?

9 A. The calculation, as set forth in Schedule 1 to my direct testimony, is based on the
to general weather normalization principles that were employed in Laclede's last rate
11 case, Case No. GR-2001-629, and in previous cases, for measuring the cost of
12 service recovery impact of deviations from the heating degree day normal. The
13 calculation is derived in three simple steps as follows:

14 Derive the heating degree day deviation from normal for the period
15 October 1, 2001 to March 31, 2002, by subtracting the actual heating
16 degree days for each month from the heating degree day normal that the
17 Company believes underlies the rates and billing determinants agreed
18 upon in Case No. GR-2001-629.

19 Multiply the heating degree day deviation from normal by the average
20 actual usage per heating degree day experienced during the period by the
21 Company's general service rate customers to determine the decrease in
22 therm usage.

1 Multiply the decrease in therm usage by the non-gas margin per therm in
2 effect for each month of the period.

3 The result represents the underrecovery of costs in dollars experienced by Laclede
4 solely due to the effect of the extraordinarily warm weather experienced from
5 October 2001 through March 2002.

6 Q. Is the Company's quantification of the impact of extraordinarily warm weather on
 its cost of service recovery reasonable and consistent with methods used to
8 quantify such impacts in the Company's general rate proceedings?

9 A. Yes. The parties who addressed the weather issue in Case No. GR-2001-629 are
10 familiar with the method used to determine the heating degree day normal
11 underlying the rates established in that case. They are also very conversant with
12 the general methods used in that case, and that the Company has proposed to use
13 in this proceeding, for quantifying the impact of deviations from that heating
14 degree day normal on the Company's revenues and hence its costs of service.
15 Accordingly, there should be no issue regarding the Company's quantification of
16 the cost recovery shortfall that it has experienced as a result of the extraordinary
17 weather event of this past winter.

18 Q. Has the Company developed a proposal for recovering this deferred amount from
19 its customers?

20 A. Yes. The Company proposes to recover the deferred amount over a five year
21 amortization period. This would result in an annual amortization amount of about
22 \$2,169,800.

23 Q. What impact would this amortization amount have on the typical customer's bill?

1 A. For the typical customer, this would represent an annual increase of \$3.44 or less
2 than one-half of one percent. On a monthly basis, this would translate into an
3 increase of less than 29 cents.

4 **Why Requested Authorization is Consistent**
5 **with the Commission's Criteria for Granting AAOs**
6

7 Q. Is the authorization requested by the Company in this case consistent with the
8 criteria that has previously been established by the Commission?

9 A. Yes. The Commission has a long history of granting accounting authority orders
10 that permit the deferral and subsequent recovery of items that either: (a) have an
11 extraordinary and non-recurring financial impact on the utility seeking such relief,
12 or that (b) concern costs associated with Commission mandated activities. The
13 authorization requested by Laclede meets both of these tests.

14 **Extraordinary and Non-Recurring Criteria**

15 Q. Please explain how the authorization requested by Laclede is consistent with the
16 first set of criteria you have identified.

17 A. The first set of criteria for granting an AAO -- i.e., that the item being covered by
18 the AAO be of an extraordinary and non-recurring nature -- was discussed at
19 length by the Commission in *Re: Missouri Public Service*, Case Nos. EO-91-358
20 and EO-91-360 (1991). As the Commission stated in those cases, AAOs are
21 appropriate:

22 ... when events occur during a period which are *extraordinary,*
23 *unusual and unique, and not recurring.* These types of events
24 generate costs which require special consideration. These types of
25 costs have traditionally been associated with extraordinary losses
26 due to storm damage or outages, conversions or cancellations. UE at
27 618. The Commission in the past has also allowed accrual of
28 Allowance for Funds Used During Construction (AFUDC) and

1 nuclear fuel leases. These were allowed because of the size of the
2 investments to be deferred. The USOA [Uniform System of
3 Accounts] recognizes that only extraordinary items should be
4 deferred. The definition cited earlier states the intent of profit and
5 loss during the period and exceptions are only for those items which
6 are of significant effect, not expected to recur frequently, and which
7 are not considered in the evaluation of ordinary business operations.
8 (emphasis added)
9

10 Q. Do the weather effects that are the subject of this Company's requested AAO
11 satisfy such criteria?

12 A. Yes. Although the Company has borne the financial brunt of abnormally warm
13 weather for much of the past 15 years, the nature and impact of weather on the
14 Company's revenues and operations has been especially severe and unusual this
15 winter, both in terms of its deviation from normal experience and the magnitude
16 of its cumulative financial impact on the Company. As to the weather itself,
17 scientists at the National Climatic Data Center for the National Oceanic and
18 Atmospheric Administration ("NOAA") recently announced (on February 21,
19 2002) that the November 2001 through January 2002 period was the warmest
20 comparable period *ever recorded* for the contiguous United States in the more
21 than 105 years since national records began in 1895. Moreover, the same
22 announcement also indicated that global weather temperatures this past January
23 were the warmest recorded for a comparable period in the past 123 years.

24 Q. Has the weather experienced by Laclede in its Missouri service territory this
25 winter been consistent with these global and national results?

26 A. Even with the brief colder than normal weather period that occurred in March, the
27 temperatures experienced in the Company's service territory from October 1, 2001
28 to March 31, 2002, were some 17% warmer than normal. As a consequence, this

1 past winter heating season was the fifth warmest ever experienced by the
2 Company in its service territory in the more than one hundred years during which
3 weather records have been maintained. Similarly, the number of Heating Degree
4 Days experienced during this period were 3,593 or some 735 below the "normal"
5 level of degree days. Graphs showing this extraordinary deviation from normal
6 weather on both a daily and cumulative basis are set forth in Schedule 2 to my
7 direct testimony. By any measure, such weather effects can only be deemed
8 extraordinary in nature, particularly in comparison to other weather-related events
9 for which the Commission has routinely granted AAO treatment, such as deferrals
10 of the costs associated with damages from ice storms which occur periodically.

11 **Costs Associated with Commission-Mandated Activities**

12 Q. Is the Company's requested authorization also consistent with the second set of
13 criteria that the Commission has identified for granting an AAO?

14 A. Yes. In addition to providing AAO treatment for the financial effects of events
15 that are extraordinary and non-recurring in nature, the Commission also indicated
16 in the Missouri Public Service case that such treatment is appropriate for costs or
17 other financial impacts which a utility is required to incur in providing public
18 utility service.

19 Q. What kind of costs or financial impacts has the Commission previously
20 determined were suitable for AAO treatment under this criteria?

21 A. These have included costs or other financial impacts that have been experienced
22 by utilities to comply with specific mandates by the Commission. Some of the
23 more notable examples of such items include the costs associated with pipeline

1 replacement programs and other safety-related activities undertaken pursuant to
2 Commission rule or order, and the uncollected revenues resulting from the
3 Commission's Emergency Cold Weather Rule Amendment. But they have also
4 included other costs as well -- ranging from pension expense to automated
5 mapping system costs -- that, while not specifically mandated by the Commission,
6 must nevertheless be incurred to provide utility service.

7 Q. Do all of the costs of service which the Company seeks to defer and recover fit
8 within this criteria?

9 A. Yes, they are all costs that the Commission determined less than six months ago,
10 with its approval of the Unanimous Stipulation and Agreement in Case No. GR-
11 2001-629, were just and reasonable and necessary to the Company's provision of
12 public utility service. As previously indicated, the Company is not seeking to
13 defer for future recovery consideration costs of service that have not typically
14 been allowed by the Commission or that have not been audited by the Staff.
15 Rather it is seeking to defer those unrecovered costs of service, and only those
16 costs, that the Commission has already found, following an extensive audit of the
17 Company's operations, to be just and reasonable and necessary to meet the
18 Company's public utility obligations. Consistent with the AAO criteria previously
19 discussed, the overwhelming majority of these costs have been incurred by
20 Laclede as a result of an extensive set of regulatory requirements and rules,
21 ranging from mandated pipeline safety programs to customer billing and service
22 requirements. As such, these costs fall squarely within that category of expenses
23 that the Commission has deemed appropriate for AAO treatment.

Why the Requested Authorization is Critical if the Company is to Maintain the Financial Resources Required to Fulfill its Public Utility Obligations

Q. You mentioned that the costs of service which the Company seeks to defer and recover are related to utility activities mandated by this Commission. Can you provide some perspective on the impact that weather has had on the financial resources available to the Company to comply with these mandated regulatory obligations and why an AAO is necessary to maintain such resources?

A. The impact of the weather event experienced this past winter on the financial resources available to the Company to fulfill its public utility obligations has been just as extraordinary as the event itself. As previously indicated, for the period beginning October 1, 2001 and ending March 31, 2002, the cost recovery shortfalls experienced by the Company due directly and solely to these weather effects was \$10.85 million. To put that number in perspective, it represents approximately 25% of the Company's pre-tax income for an entire year and nearly three-fourths of the entire annualized rate settlement granted the Company less than six months ago in Case No. GR-2001-629.

Q. What does this mean in terms of the expenditures that the Company must make to comply with its mandated utility obligations?

A. To put this shortfall in perspective, I would note that the amount of under-recovery being experienced by the Company as a result of this weather event is nearly equivalent to the expenditures which the Company must make on an annual basis to replace 8,000 copper service lines pursuant to its copper service replacement program and to complete virtually all of its other mandated pipeline replacement work.

1 Q. Please continue.

2 A. Put another way, such an amount represents nearly all of the payroll costs the
3 Company incurs on an annual basis to staff both its Customer Relations
4 Department (including operation of the Company's call center and interfaces with
5 the Company's customers) and the multiple Departments that provide the
6 Company's gas supply and control functions (i.e., operation of the Company's
7 distribution facilities and the purchase, dispatch and flow control of the
8 Company's gas supplies). If, as the Commission has previously stated, the
9 "focus" in determining whether to grant an AAO should be on "the uniqueness of
10 the event, either through its occurrence or size," then it is clear that the weather
11 event of this past winter qualifies for AAO treatment.

12 Q. Are there any other factors that have further diminished the Company's ability to
13 withstand the impact of weather on the financial resources available to it to meet
14 its public utility obligations?

15 A. Yes. The financial effects of four and a half straight years of under-earnings, the
16 loss of the GSIP, and a rising tide of bad debts from the Company's efforts to
17 maintain service to its most vulnerable customers, have significantly eroded
is Laclede's ability to withstand the kind of extraordinary impact occasioned by this
19 winter's exceptionally warm weather. Everyone undoubtedly expects Laclede to
20 provide safe service, and yet we must deal with the impact of a weather event
21 that, in short order, has virtually eliminated an amount of resources equal to that
22 required to support the Company's pipeline replacement and other safety
23 programs. However, the Company cannot and will not spend less for these

1 programs than required. Likewise, everyone expects the Company to provide
2 adequate customer service and yet we are confronted with a weather event that
3 has wiped out a level of financial resources equivalent to that required to fund all
4 the Company's call center personnel as well as every employee needed to
5 purchase, dispatch and control the flow of the Company's gas supplies. Again,
6 Laclede must provide these services. All the Company seeks in this proceeding is
7 the authority to use the accounting tools that have been specifically designed to
8 address such extraordinary events and, in the process, obtain a realistic
9 opportunity to recover what everyone has recognized as its legitimate costs of
10 service. There is absolutely no reason why the Commission should hesitate to
11 exercise its powers to achieve this fundamental goal of public utility regulation.
12 To the contrary, by giving the Company the financial resources it requires to meet
13 its public utility obligations, such action -- which can be taken at a cost of less
14 than 29 cents per month on the typical customer's bill -- is undeniably in the best,
15 long-term interests of both the Company and its customers.

16 Q. Should the fact that this under-recovery of costs of service is being caused by
17 exceptionally warm weather rather than some other factor have any impact on
18 whether an AAO is appropriate?

19 A. No. In fact just the opposite is true. The propriety of using accounting tools and
20 other measures to mitigate the impact of weather on a utility's recovery of costs
21 has actually gained a greater degree of acceptance throughout the regulatory
22 community than is the case with other items that have typically been granted
23 AAO treatment by this Commission. Right now, for example, the vast majority of

¹ See *Re: Missouri Public Service*, *supra*, p. 7

1 regulatory jurisdictions, including this one, adjust purchased gas costs through
2 tariffed accounting procedures in order to ensure that variations in weather do not
3 affect, one way or the other, the gas utilities' recovery of fixed gas costs.
4 Similarly, a large number of jurisdictions have approved clauses that also adjust
5 distribution rates to ensure that any over or under-recovery of a utility's fixed
6 distribution costs is mitigated. Many such clauses are designed to ensure a
7 complete match between the utility's fixed distribution costs of service and the
8 revenues collected to cover such costs. Accordingly, the use of an AAO to
9 address the extraordinary impact of weather on Laclede's recovery of its fixed
10 distribution costs is wholly consistent with prevailing regulatory policies in this
11 area.

12 Q. Would granting the AAO, and permitting the Company to recover the costs
13 deferred thereunder, be equivalent to guaranteeing the Company a return?

14 A. Absolutely not. As I previously indicated, the Company is not attempting to defer
15 any increases in its cost of providing utility service which have occurred since its
16 last rate case proceeding. The rates applied in the calculation of the shortfall
17 shown on Schedule 1 are those that resulted from the last rate case, Case No.
18 GR-2001-629. In fact, Laclede presently has on file a general rate case in which
19 it is requesting an overall increase to recover the significant cost increases it has
20 incurred since the update period in its last rate case. As a result, far from
21 guaranteeing a return through use of an AAO, Laclede would continue to absorb
22 significant cost increases until new rates are established. Granting the AAO

1 request would simply account for one unusual, non-recurring item: the effect of
2 extraordinarily warm winter weather.

3 Q. Do you have any concluding comments?

4 A. Yes. In view of all of the considerations discussed above, I believe it is clear that
5 the accounting authorization sought by Laclede fits squarely within the criteria
6 that the Commission has previously established for granting such relief. Indeed,
7 such authorization is independently justified under both the extraordinary and
8 non-recurring criteria that has previously been recognized by the Commission as
9 well as the mandated cost criteria. Regardless of whether the financial harm
10 visited on a utility as the result of an extraordinary weather event takes the form
11 of an ice storm that downs power lines or an extraordinary occurrence of
12 abnormally warm weather -- the source and the financial effect of the event on the
13 utility is the same. And so should be the remedy -- in this case the opportunity to
14 defer for future recovery consideration those costs that would otherwise not be
15 recovered as a consequence of the event.

16 Q. Does this conclude your direct testimony?

17 A. Yes it does.

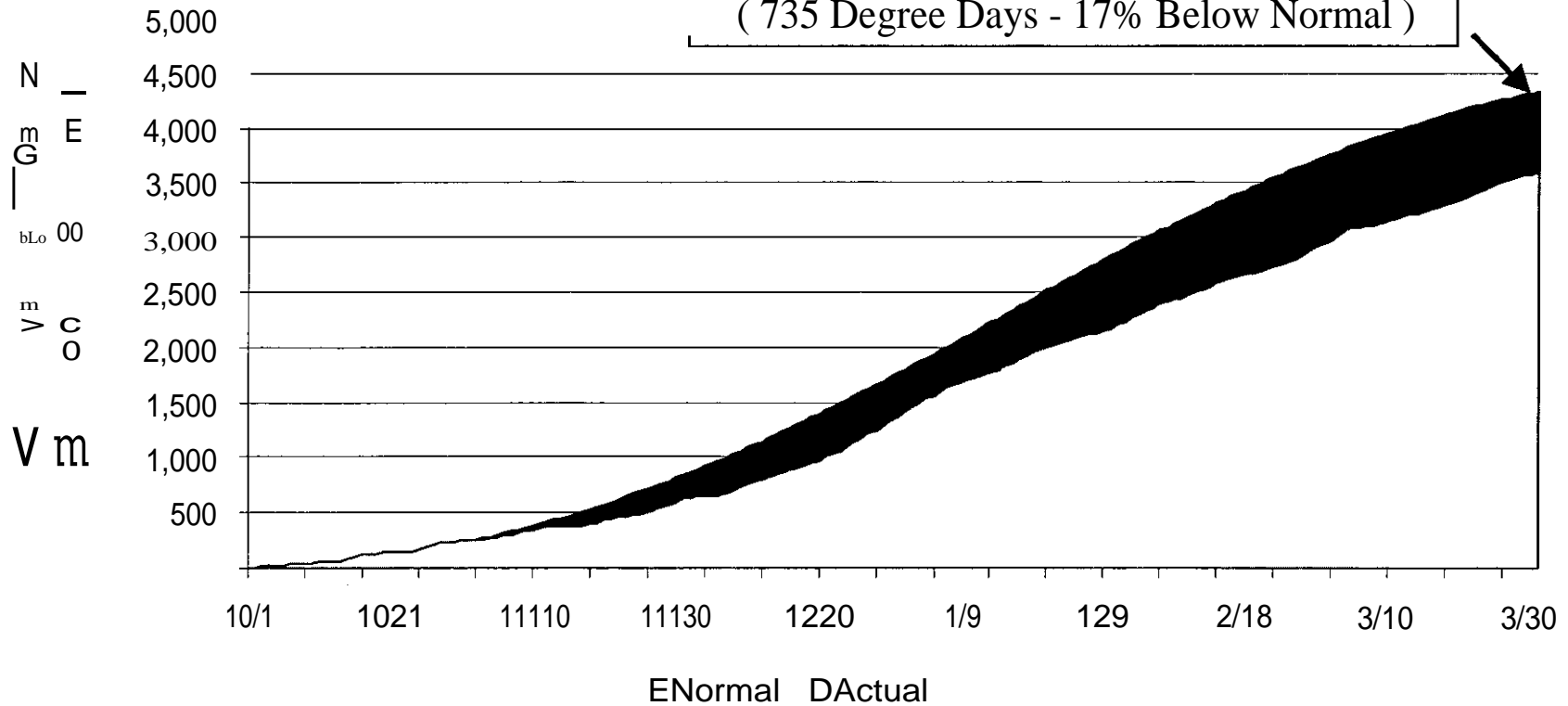
Laclede Gas Company
GA-2002-429
Heating Degree Days
Actuals through March 31, 2002

	Monthly				FYTD			
	Actual	Normal	Change	%u	Actual	Normal	Change	
Oct-01	246	226	20	8.8%	246	226	20	8.8%
Nov-01	352	586	(234)	-39.9%	598	812	(214)	-26.4%
Dec-01	772	947	(175)	-18.5%	1,370	1,759	(389)	-22.1%
Jan-02	826	1,107	(281)	-25.4%	2,196	2,866	(670)	-23.4%
Feb-02	714	847	(133)	-15.7%	2,910	3,713	(803)	-21.6%
Mar-02	683	615	68	11.1%	3,593	4,328	(735)	-17.0%
Apr - Sep	390	390	-	0.0%	390	390	-	0.0%
FY 2002	<u>3,983</u>	<u>4,718</u>	<u>(735)</u>	<u>-15.6%</u>	3,983	4,718	(735)	-15.6%

	DDV	Therms / DD	Therm Adj.	Margin Rate	Margin Adj.
Oct-01	20	109.0	2,180.0	0.13233	\$288.5
Nov-01	(234)	109.0	(25,506.0)	0.12562	(\$3,204.1)
Dec-01	(175)	109.0	(19,075.0)	0.13970	(\$2,664.8)
Jan-02	(281)	109.0	(30,629.0)	0.13970	(\$4,278.9)
Feb-02	(133)	109.0	(14,497.0)	0.13970	(\$2,025.2)
Mar-02	<u>68</u>	109.0	<u>7,412.0</u>	0.13970	<u>\$1,035.5</u>
	<u>(735)</u>		<u>(80,115.0)</u>		(\$10,849.0)

Cumulative Degree Days October 1, 2001 through March 31, 2002

Cumulative FYTD Shortfall
(735 Degree Days - 17% Below Normal)



Degree Days

October 1, 2001 through March 31, 2002

