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March 18, 2022

Ms. Cheryl Mosher
Island Regulatory & Appeals Commission
PO Box 577
Charlottetown PE C1A 7L1

Dear Ms. Mosher:

UE22503 - Application for an Order to Approve Stage 1 Rate Design Changes
Response to Additional Interrogatories from Synapse Energy Economics, Inc.

Please find attached the Company's response to the additional Interrogatories filed by Synapse Energy Economics, Inc. with respect to the Company's Application for an Order to Approve Stage 1 Rate Design Changes. An electronic copy will follow.

Yours truly,

MARITIME ELECTRIC

Gloria Crockett

Gloria Crockett, CPA, CA
Manager, Regulatory & Financial Planning

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Response to Additional Interrogatories regarding UE22503 – Application for an Order to Approve Stage 1 Rate Design Changes from Synapse Energy Economics, Inc.

Submitted March 18, 2022

IR-1 Refer to MECL's response to IR-28 from Synapse Energy Economics, Inc., submitted on October 1, 2021 that describes the 45 "Other Usage" customers with more than 5,000 kWh of consumption in January 2020. Please also refer to MECL's rules and regulations, which defines a farm as "a holding on which agricultural operations are carried out. Agricultural operations include the production of field crops including grain, vegetables, seed and forage crops; animal and dairy products including milk, cream, eggs, meat and poultry products, poultry hatcheries, nurseries and greenhouses for the production of crops or bedding plants, fur farms, apiaries, fish hatcheries and fish farms."

a. Please explain whether "cannabis grow operations," "fish farming," and "agricultural related" customers in the table provided in response to IR-28 meet the definition of a "farm" according to MECL's rules and regulations. If no, please explain why not.
b. Please explain why the cannabis, fish farm, and agricultural-related customers are not classified as farms in the Company's Rate Design Application filed on May 14, 2021.
c. How were the cannabis, fish farm, and agricultural-related customers classified for the 2017 and 2020 cost allocation studies?

Response:

a. Maritime Electric's Schedule of Rates and General Rules and Regulations defines a farm as *"a holding on which agricultural operations are carried out. Agricultural operations include the production of field crops including grain, vegetables, seed and forage crops; animal and dairy products including milk, cream, eggs, meat and poultry products, poultry hatcheries, nurseries and greenhouses for the production of crops or bedding plants, fur farms apiaries, fish hatcheries and fish farms."*

The two cannabis grow operations fall under the criterion of "greenhouses for the production of crops or bedding plants".

The three fish farming operations fall under the criteria of "fish hatcheries and fish farms".

The nine agricultural-related customers consist of:

- Two greenhouse-based operations that fall under the criterion of "greenhouses for the production of crops or bedding plants";
- Three agricultural operations (blueberries, organic vegetables and beef farming operations) that meet the definition of a farm;
- A beef slaughterhouse that ceased operation since January 2020 and whose usage is now just domestic. This is an example of a business and a residence being served from the same meter, which is allowed under the Residential Rate as long as the usage for the business is not more than half of the total usage; and
- Three grain-handling operations, which in retrospect should be served under the General Service or Small Industrial Rates instead of Residential.

b. The primary purpose of the Farm Study was to assess the impact on farm customers of the potential elimination of the declining second block Residential energy rate. It was

decided that the Farm Study would focus on larger farm customers as they would be most affected by the potential rate change, and this targeted population would make the Farm Study more manageable. The majority of the larger farm customers are potato, dairy, hog or poultry operations. As a result, the two cannabis, three fish farm and nine agriculture-related customers were not included with farms in the Farm Study. The May 14, 2021 Rate Design Application used the Farm Study data set as the Farms cohort. It is the Company's position that their exclusion does not change the results of the analysis.

c. The Farm Study data set was used for the Residential-Farm class in the 2020 Cost Allocation Study. Therefore, the two cannabis, three fish farm and nine agricultural-related customers were all treated as Residential-Year Round in the 2020 Cost Allocation Study. In the 2017 Cost Allocation Study, one cannabis and four agricultural-related customers were treated as Residential-Farm and the remainder were treated as Residential-Year Round.

2. Refer to MECL's response to IR-28 from Synapse Energy Economics, Inc., submitted on October 1, 2021 that describes the 45 "Other Usage" customers with more than 5,000 kWh of consumption in January 2020.

   a. For each of the six customer types in the table provided in response to IR-28, please provide the group's average energy consumption (kWh) for each month of 2019, 2020, and 2021.
   b. For each of the 9 "agricultural-related" customers, please provide the customer's energy consumption (kWh) for each month of 2019, 2020, and 2021.
   c. For each of the 11 "misc. commercial operations" customers, please provide the customer's energy consumption (kWh) for each month of 2019, 2020, and 2021.
   d. Please provide more details regarding the nature of electricity usage for the customers characterized as "misc. commercial operations" and explain why these customers meet the Company's residential service rate guidelines.

Response:

a. See IR-2 – Attachment 1 in the accompanying Excel workbook.

b. See IR-2 – Attachment 2 in the accompanying Excel workbook.

c. See IR-2 – Attachment 3 in the accompanying Excel workbook.

d. The table below provides the information that is readily available in the Company's billing system in regard to the nature of electricity usage by the 11 customers described as "miscellaneous commercial operations".

Miscellaneous Commercial Operations Nature of Electricity Usage		
Customer	1	Seafoods
Customer	2	Store
Customer	3	Motor Vehicle Services
Customer	4	Other Personal and Household Services
Customer	5	Store
Customer	6	Construction
Customer	7	Boat Shop
Customer	8	Restoration
Customer	9	Construction
Customer	10	Shop
Customer	11	Workshop

Maritime Electric's Residential Rate allows a business and a residence to be served from one meter as long as the electricity used for the business is no more than one half of the total electricity usage. The assessment of which category in which a new customer belongs is made at the time the customer is first connected to the electrical system. At that time, these customers would have met the definition of a Residential customer.

IR-3 Refer to MECL's rate design application filed on May 14, 2021, pages 5-6.

a. Please confirm that none of the customers in Cohort 5 (domestic consumption >5,000 kWh for January 2020) or Cohort 7 (other consumption >5,000 kWh for January 2020) have meters capable of measuring monthly demand or hourly energy usage. If this is not the case, please describe the metering data available and provide the most granular data available for the most recent three years.
b. Please confirm that the estimates of coincident peak (CP) and non-coincident peak (NCP) for Cohort 5 were developed using the CP and NCP data for Cohort 4.
c. If no customers in Cohort 7 have interval metering, please explain how the Company developed CP and NCP estimates for Cohort 7.
d. How many customers in Cohort 5 would require load research meters for a representative sample with an acceptable level of accuracy (e.g., +/- 10% at 90% confidence level)?
e. How many customers in Cohort 7 would require load research meters for a representative sample with an acceptable level of accuracy (e.g., +/- 10% at 90% confidence level)?
f. What is the cost (labor and materials) to add an additional load research meter?

Response:

a. The table below shows a breakdown of the types of meters in use for customers in Cohorts 5 and 7.

Breakdown by Type of Metering					
	kW	**KVD**	**kWD**	**ION**	**Total**
Demand readings available?	No	Yes	No	Yes	
Numbers in Cohort 5	263	1	29		**293**
Numbers in Cohort 7	21	9	14	1	**45**

Monthly demand and energy readings for 2019 through 2021 for the 10 customers with kVD meters are in tab IR-3 – Attachment 1.

The ION meter provides hourly interval data, but we have not provided the data for a single customer for reasons of confidentiality.

b. The CP and NCP loads for Cohort 5 were estimated by using the corresponding Cohort 4 loads for January 2020, multiplied by the ratio of the Cohort 5 kWh sales for that month to the Cohort 4 kWh sales for that month, as follows:

January 2020 Cohort 4 sales	19,738	MWh
January 2020 Cohort 5 sales	1,751	MWh
Cohort 4 CP and NCP	48.4	MW

Then Cohort 5 CP and NCP = 48.4 MW x 1,751 MWh / 19,738 MWh = 4.3 MW.

c. The largest customer in Cohort 7 has hourly interval metering, and accounted for approximately 40 per cent of Cohort 7 usage during January 2020. The CP and NCP estimates for Cohort 7 were developed by using the CP and NCP loads for this largest customer, multiplied by the ratio of the Cohort 7 usage for January 2020 to the usage by this largest customer for January 2020.

d. For Cohort 5, 45 randomly selected customers would require load research metering in order to estimate hourly loads with an accuracy of +/- 10 per cent and 90 per cent confidence.

e. For Cohort 7, 17 load research meters would be required in order to estimate hourly loads with an accuracy of +/- 10 per cent and 90 per cent confidence. Five of the meters would be assigned to the second through sixth largest customers (the largest customer already has interval metering), and the other 12 meters would be randomly assigned to the remaining 39 customers.

f. The cost (material plus installation) for an additional Residential load research meter is approximately $200.

IR-2 – Attachment 1, 2 and 3

Average monthly usage (kWh)

	2021 Dec	2021 Nov	2021 Oct	2021 Sep	2021 Aug	2021 Jul	2021 Jun	2021 May	2021 Apr	2021 Mar	2021 Feb	2021 Jan	2020 Dec	2020 Nov	2020 Oct	2020 Sep	2020 Aug	2020 Jul	2020 Jun	2020 May	2020 Apr	2020 Mar	2020 Feb	2020 Jan	2019 Dec	2019 Nov	2019 Oct	2019 Sep	2019 Aug	2019 Jul	2019 Jun	2019 May	2019 Apr	2019 Mar	2019 Feb	2019 Jan
2 Cannabis operations	500066	520848	518691	561868	488654	442858	486995	467802	481987	456071	460970	418479	411518	482338	480164	514227	502819	444806	377882	435306	534047	562681	569014	375264	216090	196502	172781	187677	328200	299400	325800	290400	347400	354000	408000	369000
3 Fish farms	58400	59120	55120	58320	55880	55120	60760	57000	59920	57360	62360	60360	56760	54840	49960	50480	44960	42040	44600	49120	53520	48760	52400	49320	45320	44920	42360	40240	43880	41600	44320	44800	44760	40680	44640	45560
9 Agricultural-related operations	31996	32909	19032	10810	8656	8644	7983	9921	17349	27317	39986	40498	34977	35326	18054	9040	8635	8974	9594	11886	18347	28999	33341	35462	28848	21310	7824	8053	8412	7735	8390	8032	10391	18368	26206	27058
16 Religious organizations	5798	3863	2797	2564	2563	2582	3114	4609	5559	6759	7792	7315	5933	5015	3525	2798	2925	2833	3429	5010	6126	7206	8563	8037	6751	4945	3388	2547	2497	2614	4041	5346	6548	7193	8283	8042
4 Government housing facilities	5458	4174	3545	4130	3688	3607	4328	5236	7081	7037	7358	6939	5620	4280	3428	3470	3730	4101	4379	5312	7211	7482	8409	8423	7137	5359	4261	4148	4361	4193	4746	5573	6664	7905	8903	8790
11 Miscellaneous commercial operations	5231	3546	2615	2429	2589	2383	2304	3524	5045	5761	5805	5466	3982	3400	2217	2083	2460	2403	2757	3645	5179	6458	6822	7144	6028	3867	2769	2235	2096	2159	2653	4678	5783	5335	6407	6140

Monthly usage (kWh)

	2021 Dec	2021 Nov	2021 Oct	2021 Sep	2021 Aug	2021 Jul	2021 Jun	2021 May	2021 Apr	2021 Mar	2021 Feb	2021 Jan	2020 Dec	2020 Nov	2020 Oct	2020 Sep	2020 Aug	2020 Jul	2020 Jun	2020 May	2020 Apr	2020 Mar	2020 Feb	2020 Jan	2019 Dec	2019 Nov	2019 Oct	2019 Sep	2019 Aug	2019 Jul	2019 Jun	2019 May	2019 Apr	2019 Mar	2019 Feb	2019 Jan
Agricultural-related operations:																																				
Customer 1	4320	10560	8280	2040	840	960	9120	7680	9480	22080	21120	16680	16200	22200	12480	10080	9720	13680	10560	23760	15240	22200	23160	20520	23400	27840	11640	9360	12960	11400	18840	18720	18240	26040	26520	18360
Customer 2	4960	16520	10600	9400	1920	2160	1560	1760	2600	3240	3720	4280	5400	6480	4320	8440	2880	2040	3040	2840	5800	5080	4880	7440	8280	4760	5760	5880	3400	3600	5160	2280	3920	3760	4200	3480
Customer 3	1800	12540	3240	4260	2100	0	60	60	60	60	120	60	240	6900	120	2760	3540	60	60	0	60	120	120	960	6180	6060	120	2100	120	60	120	60	60	120	180	960
Customer 4	247320	231240	127800	55680	46800	48840	36840	50400	109680	180960	295200	310320	264360	252480	121080	32400	29400	31080	45240	48840	104040	190560	213000	235080	174000	111720	18240	12720	12480	11640	13200	16320	36120	88680	145680	157080
Customer 5	5680	3280	2320	3120	3200	4640	6560	5200	6720	8640	8960	8800	6240	5760	4480	5280	4800	6160	7520	6000	8320	9120	11200	10720	9680	6080	5920	7200	5360	6720	6080	6560	7680	10560	11760	11440
Customer 6	4518	3797	3506	3262	2766	2486	3065	4461	4706	5344	5699	4607	4497	4364	3970	2728	3346	2881	3101	5170	6882	8915	9745	7642	5632	5890	4558	3130	3058	3493	4016	5914	5868	8544	11110	11065
Customer 7	6003	9130	3929	5899	3643	4325	3463	5413	3400	5617	4744	3935	4393	8887	8174	3701	3918	4332	4722	3289	2260	3053	7287	5381	6529	9160	4006	4584	4946	6684	4046	4182	2653	4341	8854	12016
Customer 8	2400	1593	1537	1873	1359	1189	1097	1591	2135	3112	3513	3002	2181	1499	1298	1008	1468	1176	980	1475	1638	2187	6597	10857	10252	10521	9052	10067	12107	9538	8608	7928	7858	8387	11066	10003
Customer 9	10960	7520	10080	11760	15280	13200	10080	12720	17360	16800	16800	12800	11280	9360	6560	14960	18640	19360	11120	15600	20880	19760	24080	20560	15680	9760	11120	17440	21280	16480	15440	10320	11120	14880	16480	19120

Monthly usage (kWh)

		2021 Dec	2021 Nov	2021 Oct	2021 Sep	2021 Aug	2021 Jul	2021 Jun	2021 May	2021 Apr	2021 Mar	2021 Feb	2021 Jan	2020 Dec	2020 Nov	2020 Oct	2020 Sep	2020 Aug	2020 Jul	2020 Jun	2020 May	2020 Apr	2020 Mar	2020 Feb	2020 Jan	2019 Dec	2019 Nov	2019 Oct	2019 Sep	2019 Aug	2019 Jul	2019 Jun	2019 May	2019 Apr	2019 Mar	2019 Feb	2019 Jan
Miscellaneous commercial operations:																																					
Customer	1	6295	4763	3329	2668	2568	2995	3229	4224	5369	6240	6487	6474	6319	5056	3268	3489	2958	2950	2778	3966	5532	5510	6191	6632	6845	5287	4004	2336	2577	2531	2659	3765	4172	4597	5731	6401
Customer	2	3919	2286	1744	2314	2087	2396	2725	3612	4755	5230	4814	4703	3120	3054	2627	2204	2323	2211	2808	3427	4633	4899	5239	5462	4436	3399	1954	2014	2419	2023	2969	3039	3823	5005	5849	4858
Customer	3	7425	1874	855	845	911	1104	966	1379	4883	6143	5743	5065	4242	2591	980	900	747	967	880	1987	3892	4471	5105	5201	5128	3291	809	860	875	848	884	2689	4092	4814	6437	5886
Customer	4	2177	1108	879	1026	1003	1017	1114	1778	2245	2591	2637	2474	1716	1450	1037	983	1126	1177	1327	1783	2303	2427	3077	1809	5557	1126										
Customer	5	7373	7010	7439	8782	9408	8108	6815	6325	6653	6562	7342	7035	6450	6473	6357	7345	7936	7158	6507	5742	6512	7549	8170	7450	6507	5813	5776	6789	8145	7064	6218	5467	6281	6374	7254	6747
Customer	6	2423	1948	148	11	41	186	1370	2556	4753	5126	4563	3700	2125	889	40	12	8	49	805	2810	5498	6571	5765	7507	5621	2436	2785	281	32	127	5396	11642	9435	1360	0	0
Customer	7	11102	8928	5449	2816	2942	2438	2306	7799	11370	12310	13055	11773	9587	8319	3052	2002	2398	1991	2539	6673	9977	12177	13269	12206	11349	8158	4666	3909	2262	2500	3131	5753	9358	10569	13812	13428
Customer	8	3759	2487	2583	2270	3315	2223	1522	2413	3481	4457	5014	4959	3850	3055	1677	2065	2305	2185	1621	3039	3883	4777	5595	5858	4427	3603	2076	1999	2058	1890	2076	2999	3319	4627	5768	5660
Customer	9													-687	849	1128	586	3884	4420	8160	6081	8842	15815	14815	10781	9482	4645	1858	702	255	288	0						
Customer	10	3621	2184	1921	1933	1892	1728	1627	3111	4031	5049	4420	4591	3581	2622	1856	1480	1387	1189	1038	2313	2746	2947	3784	10417	928	915	997	1225	241		543	2072				
Customer	11	4217	2876	1804	1623	1721	1635	1368	2038	2909	3903	3976	3882	3502	3044	2360	1843	1993	2139	1861	2273	3147	3899	4029	5260												

IR-3 – Attachment 1

Monthly Demand and Energy for Customers in Cohorts 5 and 7 with kVD Meters

		2021 Dec	2021 Nov	2021 Oct	2021 Sep	2021 Aug	2021 Jul	2021 Jun	2021 May	2021 Apr	2021 Mar	2021 Feb	2021 Jan	2020 Dec	2020 Nov	2020 Oct	2020 Sep	2020 Aug	2020 Jul	2020 Jun	2020 May	2020 Apr	2020 Mar	2020 Feb	2020 Jan	2019 Dec	2019 Nov	2019 Oct	2019 Sep	2019 Aug	2019 Jul	2019 Jun	2019 May	2019 Apr	2019 Mar	2019 Feb	2019 Jan
Customer 1	Demand (kW)	16.1	17.5	10.3	10.9	13.9	16.6	20.5	12.4	15.4	14.6	14.8	16.9	16.3	16.2	15.1	10.8	10.7	11.2	16.6	19.7	20.3	17.5	17.7	20.2	17.6	17.8	12.3	10.5	12.1	10	16.1	18.1	16.4	20.3	18.8	19.9
Cohort 5	Energy (kWh)	3120	2040	1920	2760	2400	2100	2160	2340	3060	3120	3960	3660	3240	2880	1980	2460	2340	2100	2880	3300	4740	3600	4560	5520	4500	2880	2160	2400	2460	1800	2940	3720	3360	4320	4860	5160
Customer 1	Demand (kW)	534	593.4	619.8	713.4	664.8	607.2	672	572.4	648	708	620.4	606	656.4	623.4	764.4	744.6	798.6	757.2	641.4	660.6	802.2	933.6	919.8	747.6	492	622.8	776.4	744.6	709.8	650.4	674.4	607.8	728.4	775.2	796.2	794.4
Cohort 7	Energy (kWh)	252000	312000	296400	333600	313800	271800	312600	281400	310200	282000	331800	312000	256200	313800	287400	325200	322800	328200	304200	334200	344400	402600	380400	327000	213000	281400	282000	322200	328200	299400	325800	290400	347400	354000	408000	369000
Customer 2	Demand (kW)	131.8	124.6	131.4	132.8	108	139.7	130	130.3	119.2	127.4	142.9	124.9	115.9	109.8	94.3	88.2	73.1	81.4	61.6	88.6	89.3	79.9	88.9	83.9	72.4	62.3	51.8	40	42.5	38.2	28.8	42.8	40	42.8	43.9	36.7
Cohort 7	Energy (kWh)	72360	72360	63000	68400	65160	66960	80640	67320	70200	71640	77760	70920	64800	60840	51120	49320	30240	28440	29160	43200	42840	35280	41760	35280	27000	25200	22320	18360	18720	14400	14040	16920	18720	20880	26640	21600
Customer 3	Demand (kW)	71.8	76.8	76	75.8	75	78.4	77.6	78.5	77.3	79.1	78	79.7	77.2	74.4	70.1	66.8	65.3	61.3	66.8	72.5	83.3	83.3	83.6	80.2	82.9	81.6	77.2	82.4	81	86.2	87.5	89.9	89	84.1	80.5	81.7
Cohort 7	Energy (kWh)	45240	48600	48120	49440	49680	48120	49800	48600	50640	47280	52080	51960	48840	47160	43560	42600	42000	39120	42000	42600	54720	51840	53520	52800	49560	50040	48240	48240	53640	51960	56880	57000	57480	48960	50880	52800
Customer 4	Demand (kW)	566.4	575.4	461.8	339.2	322	457.1	127.7	227	472	563	605.3	600.1	586.9	568.6	561.5	130.2	114.4	107	149.2	369.2	458.6	475.8	456.2	511.6	476	397.2	121.1	48.4	39.6	37.3	66.6	47.5	200.4	338.3	393.2	373.9
Cohort 7	Energy (kWh)	247320	231240	127800	55680	46800	48840	36840	50400	109680	180960	295200	310320	264360	252480	121080	32400	29400	31080	45240	48840	104040	190560	213000	235080	174000	111720	18240	12720	12480	11640	13200	16320	36120	88680	145680	157080
Customer 5	Demand (kW)	55	44.6	37.3	33.3	41.4	36.3	32.9	52.2	56.6	69.1	70.4	56.5	67.1	50.4	39.8	47.8	49.3	45.7	41	65.5	59.8	65.4	75.4	78.4	60.5	49.3	51.2	58.2	67.5	55.4	52.1	53.7	55.9	65.5	101.4	68
Cohort 7	Energy (kWh)	10960	7520	10080	11760	15280	13200	10080	12720	17360	16800	16800	12800	11280	9360	6560	14960	18640	19360	11120	15600	20880	19760	24080	20560	15680	9760	11120	17440	21280	16480	15440	10320	11120	14880	16480	19120
Customer 6	Demand (kW)	32	31.2	31.6	31	30.6	32.1	25.9	24.9	26.2	24.5	22.4	22.7	22.8	23.1	25.2	23.8	25.1	28.4	22.8	23.1	22.8	22.9	23.6	21.2	n / a	21.4	21.8	26.9	23.4	22.7	25.9	22.2	22.4	22.5	24.6	22.3
Cohort 7	Energy (kWh)	7373	7010	7439	8782	9408	8108	6815	6325	6653	6562	7342	7035	6450	6473	6357	7345	7936	7158	6507	5742	6512	7549	8170	7450	6507	5813	5776	6789	8145	7064	6218	5467	6281	6374	7254	6747
Customer 7	Demand (kW)	18.8	12	10.6	12	12.9	12	14.4	15	17	18.8	24	25	18.5	13.4	10.6	10.5	10.1	9.7	14	16.5	19.9	33.4	27.8	25.3	32.8	22.2	20.2	21	18.3	20.1	29.5	27	25.7	31.2	31.1	24.8
Cohort 7	Energy (kWh)	5120	2840	1880	2840	2040	2040	3520	4320	5760	6320	7040	7680	5160	3440	2080	2440	2160	2120	3560	4280	4480	5720	6800	5720	4960	3920	2680	3200	3320	2760	4720	5960	6440	8280	8160	6800
Customer 8	Demand (kW)	14	9.5	9.4	8.7	9.4	10.7	13.6	12.5	14.2	13.5	15.9	14.6	15.6	15.3	14.4	13.7	13.4	18.2	17.7	19.5	24	23.2	21	21.9	17.7	21.9	15.3	13.8	15.8	20.7	16.2	33.4	17.2	19	23.1	26.1
Cohort 7	Energy (kWh)	2960	2480	2240	1920	2080	1960	2760	4400	4840	4560	5120	5160	5480	5440	4640	3960	4120	5000	6000	6360	7240	7280	7880	8120	4520	3440	2160	1640	1640	1600	2760	7160	8520	8040	9120	9080
Customer 9	Demand (kW)	55	49	59.2	58	36.2	58.2	56.3	58.7	58.4	59.5	60.7	59.3	58.3	77	58.1	35.9	46.2	30.7	54.8	57.2	58.4	59.6	71.8	58.3	n / a	80.8	58.9	59.7	55.1	48.2	80.3	66.4	59.5	57.6	57.5	61.9
Cohort 7	Energy (kWh)	8400	5040	3120	960	720	960	2340	5340	6720	9420	10560	9840	7680	6180	2880	780	720	900	1620	3420	6360	9300	11280	10380	9060	6720	3600	2280	960	1080	4020	5760	7200	10380	12060	11460