



**Ontario Energy Board
Commission de l'énergie de l'Ontario**

DECISION AND ORDER ON COST AWARDS

EB-2015-0029 / EB-2015-0049

UNION GAS LIMITED

ENBRIDGE GAS DISTRIBUTION INC.

Applications for approval of 2015-2020 demand side management plans.

BEFORE: Christine Long
Presiding Member

Allison Duff
Member

Susan Frank
Member

May 10, 2016

INTRODUCTION AND SUMMARY

Union Gas Limited (Union) and Enbridge Gas Distribution Inc. (Enbridge) filed applications, dated April 1, 2015, with the Ontario Energy Board (the OEB) under section 36 of the *Ontario Energy Board Act, 1998*, for orders approving their respective demand side management (DSM) plans for the years 2015 to 2020. The OEB heard both DSM plan applications as part of a combined proceeding.

The OEB granted intervenor status and cost award eligibility to the following parties:

- Association of Power Producers of Ontario (APPrO)
- Building Owners and Managers Association Toronto (BOMA)
- Canadian Manufacturers and Exporters (CME)
- Consumers Council of Canada (CCC)
- Energy Probe Research Foundation (Energy Probe)
- Environmental Defence
- Federation of Rental-housing Providers of Ontario (FRPO)
- Green Energy Coalition (GEC)
- Industrial Gas Users Association (IGUA)
- London Property Management Association (LPMA)
- Low-Income Energy Network (LIEN)
- Ontario Greenhouse Vegetable Growers (OGVG)
- Ontario Sustainable Energy Association (OSEA)
- School Energy Coalition (SEC)
- Vulnerable Energy Consumers Coalition (VECC)

On January 20, 2016, the OEB issued its Decision and Order in which it set out the process for intervenors to file their cost claims, for Union and Enbridge to object to the claims and for intervenors to respond to any objections raised by Union and Enbridge.

The OEB received cost claims from APPrO, BOMA, CME, CCC, Energy Probe, Environmental Defence, FRPO, GEC, IGUA, LPMA, LIEN, OGVG, OSEA, SEC and VECC.

On February 17, 2016, Union filed a response to the cost claims and noted that the total amount claimed for both proceedings was significant – in excess of \$1.4 million. Union noted that the amount of time and expense claimed by GEC was excessive. GEC engaged two consultants who provided expert reports. Union further noted that GEC's claim included ten separate people in total and was more than three times the amount claimed by the intervenor with the next highest cost claim. Union requested that the

OEB scrutinize all costs being claimed by GEC and other intervenors to ensure that the total costs recovered were proportional to the value provided.

Also on February 17, 2016, Enbridge filed a response to the cost claims and stated that it had no overall objection to the cost claims. Enbridge also provided some comments regarding disbursements and time dockets. Enbridge noted that the hours put forward by the intervenors varied greatly and suggested the OEB review the reasonableness of the cost claims.

OEB FINDINGS

The OEB's Discretion in Awarding Costs

The OEB's *Practice Direction on Cost Awards* provides that the OEB can make a determination on costs based on a variety of factors including, but not limited to, whether the intervenor contributed to a better understanding of the issues before the OEB, whether the participation was not unduly repetitive and whether the participation of the intervenor focused on relevant and material issues.¹ The OEB has focused on these factors in coming to its conclusions regarding the cost claims of the intervenors.

The OEB has reviewed and approves the cost claims of CCC, IGUA, LIEN, OGVG, SEC and VECC.

The OEB has reviewed and approves the cost claims of APPrO, Environmental Defence, FRPO and OSEA subject to the following disbursement claim adjustments: (1) for APPrO a reduction of \$42.29 due to missing parking receipts, (2) for Environmental Defence a reduction of \$492.56 due to a billing error related to translation costs for a cross-examination exhibit, (3) for FRPO a reduction of \$1.54 to comply with the government's *Travel, Meal and Hospitality Expenses Directive* and (4) for OSEA a reduction of \$3.25 due to scanning/photocopy charge that did not match with the claim.

The OEB has reviewed and has made reductions to the cost claims of BOMA, CME, Energy Probe, LPMA and GEC. The OEB's reasons for the reductions follow.

BOMA

The OEB is reducing BOMA's fees claim from \$122,430.00 to \$98,604.00 amounting to a reduction of \$23,826.00, before tax.

The OEB notes that the amount of time spent by BOMA on interrogatories was 101.6 hours – double the average amount of time spent by the other intervenors. The OEB finds that the interrogatories posed and positions taken by BOMA do not support this

¹ OEB Practice Direction on Cost Awards, April 24, 2014, Section 5(b) and 5(d).

amount of interrogatory preparation time. The OEB has reduced interrogatory time by 50 hours from 101.6 hours to 51.6 hours. At an hourly rate of \$330, this reduction amounts to \$16,500.00.

The cost claim in total amounted to 371 hours. Work on the file was undertaken by an experienced counsel and an experienced analyst. The OEB is of the view that less preparation time should have been needed by such experienced individuals. As such, the OEB is reducing technical conference and hearing preparation time by 20% or 22.2 hours. At an hourly rate of \$330 this reduction amounts to \$7,326.00.

CME

The OEB has reduced CME's fees claim from \$72,948.00 to \$49,966.70 amounting to a reduction of \$22,981.30 before tax.

CME claimed "other preparation time" of 27.6 hours and oral hearing preparation time of 54.2 hours for a total of 81.8 hours. This amount of time is too high given CME's involvement at the oral hearing and attendance of 28.90 hours. The OEB reduces the 81.8 hours by half. The award of 40.9 hours in preparation time is comparable to other intervenors with similar oral hearing participation (i.e. CCC, Energy Probe, OSEA). Two lawyers worked on the file. The OEB has used a blended legal rate of \$259² an hour. A reduction of 40.9 hours at \$259 an hour amounts to \$10,593.10. The OEB approves the additional preparation time of 68.9 hours claimed by CME related to the technical conference and interrogatories.

CME claimed 87.6 hours for preparation of its final argument. The final argument contained a 38 page table which summarized the recommendations of Synapse (OEB staff's expert) and Enbridge's and Union's positions on those recommendations. Enbridge and Union would be in the best position to summarize the applicants' positions in reply argument. The final argument prepared by CME was similar in nature and scope to the final argument prepared by CCC. Both arguments were similar in their level of analysis and specificity. The OEB has compared the hours claimed by CME and CCC. CCC claimed 46 hours for preparation of its final argument. Accordingly, the OEB is making a reduction to the amount of time claimed by CME to prepare the final argument. The OEB has reduced the time to be claimed by half from 87.6 hours to 43.8 hours using a blended rate of \$259 per hour. The disallowance amounts to \$11,344.20.

² The blended rate is calculated based on other preparation, oral hearing preparation and argument preparation activities.

In addition, the OEB does not find that time spent after the decision in this matter was issued provides any value to the panel. Consequently the OEB disallows the claim of 3.6 hours for post-decision activities of \$1,044.00.³

Disbursements

The OEB disallows the Lawyers' Professional Indemnity Company Civil Litigation Transaction Levy (LPIC) surcharges of \$113 claimed by CME. The OEB is unclear why this amount is being charged by CME, nor how it provides value to ratepayers. While the OEB is aware that this charge has been approved by other OEB panels, each OEB panel makes its costs decision based on the circumstances of each case. The cost will not be accepted in this case.

CME claimed \$169.50 for flight change fees which the OEB disallows. These changes were made at the discretion of and for the convenience of CME representatives. Accordingly this additional cost should not be paid by ratepayers.

The disbursements claim of CME also requires a further reduction of \$82.36 due to missing itemized receipts for meals and exceeding the allowances set out in the government's *Travel, Meal and Hospitality Expenses Directive*.

Energy Probe

The OEB has reduced Energy Probe's fees claim from \$47,280.00 to \$42,330.00 amounting to a reduction of \$4,950.00 before tax.

The OEB finds the oral hearing preparation time of 40.5 hours was excessive given that Energy Probe's examination focused on one utility and the positions of the experts directed to that utility's application and proposals. The OEB reduces the claim by 15 hours at an hourly rate of \$330 for a reduction of \$4,950.00.

LPMA

The OEB has reduced LPMA's fees claim from \$44,220.00 to \$39,270.00 amounting to a reduction of \$4,950.00 before tax.

The LPMA intervention was focused solely on Union's application. The OEB finds that 77.7 hours spent on interrogatory preparation and responses for one application is too high, compared to other intervenors that submitted interrogatories regarding both applications and the expert evidence. The OEB has reduced the amount of hours claimed by 15 hours at an hourly rate of \$330 for a reduction of \$4,950.00.

³ Note that this reduction was not calculated using the blended rate. The claim was incurred by only one lawyer at a rate of \$290 per hour.

GEC

GEC's fees claim for its participation in this proceeding was \$450,139.50 before tax. The OEB finds this amount to be excessive.

Union filed a response addressing the GEC cost claim. Union indicated that GEC's cost claim includes fees from ten people. GEC's fee claim is more than three times the amount of the next highest intervenor claim. GEC claims 1,615.55 hours for both the Union and Enbridge applications while the other intervenors that focused on both applications claimed approximately 200 hours on average.

GEC acknowledges that its cost claim is greater than the next highest intervenor. In support of its claim, GEC provided the following reasons.

- This is the first proceeding to consider the OEB's new DSM Framework
- GEC submitted pre-filed evidence of 111 pages which covered various topics
- GEC co-operated with other intervenors
- Other intervenors relied on the GEC evidence
- GEC participated in all aspects of the proceeding – GEC asked 128 interrogatories (not including sub-parts), responded to 86 interrogatories and 15 transcript undertakings
- GEC's argument was 71 pages, addressed 10 topics from the list of 13 and included 134 citations

Findings

The OEB has reduced GEC's fees claim from \$450,139.50 to \$332,217.00 amounting to a reduction of \$117,922.50 before tax. The OEB has reduced GEC's fees claimed for four main reasons.

1. An emphasis on matters that were outside the scope of the proceeding
2. Excessive amount of preparation time claimed by the experts
3. Duplication of effort by the various members of the GEC team
4. Case management fees

The Decision will deal with each reason in turn.

1. Scope of the Proceeding

The OEB recognizes that the DSM Framework and Guidelines are not strictly binding on the panel, however, the OEB finds that GEC spent too much time challenging aspects of the DSM Framework that had already been reviewed by the OEB through the development of the Framework and the Guidelines.

Prior to the applications being filed by the utilities, the OEB undertook a comprehensive review of the framework governing gas distributors' DSM activities. The consultation process had two phases. The OEB undertook a working group consultation between April and July 2014. This consultation resulted in the production of a draft Framework and Guidelines. In October 2014, the OEB then invited parties to comment on the draft Framework and Guidelines. GEC was not invited to be one of the stakeholders to participate in the working group. GEC did however provide comments to the OEB on the draft Framework and Guidelines as part of the October review. After considering the comments of the parties, the OEB issued the final Framework and Guidelines on December 22, 2014.

In this proceeding, GEC re-argued many of the comments it put forward as part of its submission on the draft Framework and Guidelines. Despite the OEB having already rejected the arguments put forward in the submission phase, GEC decided to re-argue the issues before the OEB in this proceeding.

Specifically, GEC made submissions regarding the Societal Cost Test and recommended that the OEB require utilities to incorporate avoided costs of supply side infrastructure into their avoided cost calculation, as well as a carbon adder, a placeholder value for commodity price-reducing effects of DSM, and a placeholder for non-energy benefits.

During the development of the DSM Framework and Guidelines, GEC argued that "compromising of the direction to achieve all cost-effective DSM due to a concern about rate impact must be based on an analysis of what rate impact would be undue given the bill reducing benefits and societal benefits of DSM."⁴

The OEB rejected GEC's arguments. The final DSM Framework and Guidelines were clear that for DSM activities between 2015 and 2020, the gas utilities annual DSM budgets should be guided by the principle that DSM costs (inclusive of DSM budget and incentive amounts) should be no greater than \$2.00/month. This represented a doubling of the previous bill impact for a typical residential impact at just under \$1.00/month. The OEB, in creating this target, established a maximum budget guideline for the new DSM Framework. After reviewing all the evidence in the proceeding, the panel found the reasons behind the establishment of a maximum guideline to be persuasive. While GEC sought to challenge the guideline established through the consultation, which is an avenue available to them, GEC spent too much time and resources doing so.

⁴ EB-2014-0134. GEC Comments on the Draft DSM Framework, p. 9

2. Excessive amount claimed for preparation time by the experts

GEC retained two experts; Mr. Chris Neme and Mr. Paul Chernick. Both experts filed a report. GEC was responsible for retaining, instructing and supervising the experts. In total, the amount claimed for participation by the two experts was \$221,677.50, excluding HST.

This amount does not include any of the 308.1 hours claimed by GEC counsel for the proceeding. Nor does it include the 101.7 hours claimed by the GEC analyst for preparation time.

Mr. Neme

Mr. Neme's evidence covered five subject areas. Mr. Neme's fees (not inclusive of HST or disbursements) equalled \$108,322.50 for 328.3 hours.

In addition to his own time, cost claims were made for three individuals who assisted Mr. Neme. The cost claims for these individuals (Grevatt, Faesy and Wilson) amounted to \$17,837.50 for 71.8 hours.

Therefore, the total amount claimed by Mr. Neme and his associates was \$126,160.00.

Mr. Chernick

Mr. Chernick's evidence dealt solely with the issue of avoided costs. Mr. Chernick's fees (not inclusive of HST or disbursements) amounted to \$113,355.00 for 343.5 hours.

Like Mr. Neme, he also billed the time of three individuals who assisted him with his work (Geller, Metcalf and Auster). The claims for these three individuals amounted to \$35,817.50 for 133.8 hours.

Therefore, the total amount claimed by Mr. Chernick and his associates was \$149,172.50.

Combined experts' time

Mr. Neme billed 200.5 hours for preparation of his evidence. Mr. Chernick billed 260.5 hours for preparation of his evidence. These hours do not include any hours billed for preparing or answering interrogatories.

The OEB is concerned with the amount of time billed by the experts in the preparation of their evidence. Both individuals are experts in their field. Mr. Neme's CV shows that he has appeared as a witness in 298 proceedings. Mr. Chernick's experience is equally

impressive. Given the level of expertise of the individuals, the OEB is of the view that the amount of time claimed for the evidence prepared is too high. Experts are selected on the basis of their expertise. They draw upon their expertise in a subject area and apply their knowledge to the issues before the OEB which are specific to the proceeding. This knowledge base allows evidence to be supplied to the OEB in an efficient manner. The OEB will not opine on the reasons responsible for the amount of evidence preparation time being too high, but the OEB notes that ultimately, in instructing an expert, an intervenor has the responsibility to ensure that expert evidence is prepared in a way that is efficient and provides value to the OEB.

The issue of avoided costs was dealt with in the DSM Framework and Guidelines. GEC made its position known at the time it provided comments on the draft October 2014 DSM Framework and Guidelines. The OEB did not follow GEC's recommendations. GEC chose to re-argue its position at the hearing. GEC chose to retain an expert to deal solely with this issue at a cost of \$149,172.50. The amount of time and resources spent on the issue by GEC was out of proportion with the decision points before the OEB in this proceeding.

3. Duplication of Effort

The OEB is concerned with the level of duplication of effort by GEC. In a review of the dockets of those claiming time on this file, there is duplication of effort which should not be borne by the ratepayer. Examples include the number of individuals involved in interrogatory responses and the preparation of evidence. The docket entries show that an expert, a team of three support staff, an analyst from the intervenor and intervenor's counsel were all involved in the preparation of evidence. Similarly, five individuals docketed time for interrogatory response preparation. The OEB questions why this amount of resources was necessary to provide interrogatory responses on an expert's report or to prepare the evidence itself. These are common steps in the OEB process.

4. Case Management Fees

GEC has claimed 109.8 hours in case management fees. The next highest claim for case management in this proceeding was 3.6 hours. The other intervenor who filed evidence claimed no time for case management.

The OEB finds 109.8 hours in case management time to be excessive. An intervenor is responsible for managing its participation in a proceeding. If an intervenor chooses to involve a large amount of individuals in the case, it should not expect that the OEB will then reimburse the costs of the intervenor to manage the participation of those people.

For the reasons indicated, the OEB has made the following reductions to the fees claimed by GEC:

1. **Scope of the Proceeding**
2. **Excessive amount claimed for preparation time by the experts**

Chris Neme

Preparation of Evidence

(200.5 hours reduced by 50%)

Disallowed 100.25 hours at \$330 per hour \$33,082.50

Paul Chernick

Preparation of Evidence

(260.5 hours reduced by 50%)

Disallowed 130.25 hours at \$330 per hour \$42,982.50

3. **Duplication of Effort**

Susan Geller

Evidence Preparation Support

(81.75 hours reduced by 50%)

Disallowed 40.875 hour at \$330 per hour \$13,488.75

Simon Metcalf

Evidence Preparation Support

(40.5 hours reduced by 50%)

Disallowed 20.25 hours at \$170 per hour \$3,442.50

Adam Auster

Evidence Preparation Support

11.5 hours reduced by 50%)

Disallowed 5.75 hours at \$170 per hour \$977.50

Kai Millyard

Interrogatories Support

Interrogatories Preparation 84.3 hours

Interrogatories Responses 84 hours

(168.3 hours reduced by 25%)

Disallowed 42.075 hours at \$170 per hour \$7,152.75

No further reduction has been taken for Mr. Neme's support staff as their cost was half that charged by Mr. Chernick's support team.

4. Case Management Fees

Kai Millyard (109.8 hours reduced to 11) Disallowed 98.8 hours at \$170 per hour	<u>\$16,796.00</u>
Total Reduction in fees claimed	\$117,922.50

Disbursements

The disbursements claimed require the following adjustments:

(1) for Mr. Poch a reduction of \$269.75 due to wrong mileage rate used on August 23 to September 3 and non-compliance with the government's *Travel, Meal and Hospitality Expenses Directive*.

(2) a) for Mr. Neme a reduction of \$83.90 due to an exchange rate difference and non-compliance with the government's *Travel, Meal and Hospitality Expenses Directive*.

b) Mr. Neme claimed two non-refundable return flights from the oral hearing due to scheduling changes on the day he provided testimony, which he explained was less expensive than booking one refundable flight. Given that Mr. Neme chose the least cost travel alternative in accordance with the OEB's *Practice Direction on Cost Awards*, the OEB is prepared to accept the cost of both flights.

(3) a) for Mr. Chernick a reduction of \$446.34 due to missing meal and taxi receipts, and non-compliance with the government's *Travel, Meal and Hospitality Expenses Directive* on taxi tip allowance.

b) for Mr. Chernick a reduction of \$733.61 due to an exchange rate error on his airfare to attend the technical conference. Mr. Chernick's roundtrip airfare for the second technical conference was booked in Canadian dollars but the amount was erroneously claimed in US dollars.

c) for Mr. Chernick a reduction of \$606.21 on his airfare to attend the oral hearing. Mr. Chernick's roundtrip airfare for the hearing was not in accordance with the OEB's *Practice Direction on Cost Awards* which requires that the least cost travel alternative be used. Business class airfare was purchased instead of economy class, as this was

the only fare available on such short notice. The OEB notes that parties were given ample notice of when they would be required to give evidence during the oral hearing, and therefore ratepayers should not bear the cost of flights booked on very short notice. The OEB will reimburse for an equivalent economy fare for Mr. Chernick's return airfare to attend the oral hearing, which has been calculated based on the flight costs incurred by OEB staff's expert consultants, who were travelling between Toronto and Boston with similar scheduling circumstances.

In Procedural Order No. 3, the OEB indicated it would allocate intervenor costs to each utility, as appropriate, for recovery. Intervenor costs have been allocated evenly between the two utilities, except where an intervenor's participation focused solely on one of the utilities in which case, that utility will bear the full cost of that intervenor's approved claim.

Cost calculation details are provided in Appendix A.

THE ONTARIO ENERGY BOARD ORDERS THAT:

1. Pursuant to section 30 of the *Ontario Energy Board Act, 1998*, Union shall immediately pay the following amounts to the intervenors for their costs:

• Association of Power Producers of Ontario	\$46,750.04
• Building Owners and Managers Association Toronto	\$55,782.56
• Canadian Manufacturers and Exporters	\$29,865.96
• Consumers Council of Canada	\$33,933.90
• Energy Probe Research Foundation	-
• Environmental Defence	\$19,275.13
• Federation of Rental-housing Providers of Ontario	-
• Green Energy Coalition	\$180,079.07
• Industrial Gas Users Association	\$34,372.11
• London Property Management Association	\$44,375.10
• Low-Income Energy Network	\$17,743.82
• Ontario Greenhouse Vegetable Growers	\$26,397.93
• Ontario Sustainable Energy Association	\$35,025.61
• School Energy Coalition	\$64,157.45
• Vulnerable Energy Consumers Coalition	\$31,794.75

2. Pursuant to section 30 of the *Ontario Energy Board Act, 1998*, Enbridge shall immediately pay the following amounts to the intervenors for their costs:

• Association of Power Producers of Ontario	\$46,750.04
• Building Owners and Managers Association Toronto	\$55,782.56
• Canadian Manufacturers and Exporters	\$29,865.96
• Consumers Council of Canada	\$33,933.90
• Energy Probe Research Foundation	\$45,081.45
• Environmental Defence	\$19,275.13
• Federation of Rental-housing Providers of Ontario	\$29,688.50
• Green Energy Coalition	\$180,079.07
• Industrial Gas Users Association	\$34,372.11
• London Property Management Association	-
• Low-Income Energy Network	\$17,743.82
• Ontario Greenhouse Vegetable Growers	-
• Ontario Sustainable Energy Association	\$35,025.61
• School Energy Coalition	\$64,157.45
• Vulnerable Energy Consumers Coalition	\$31,794.75

3. Pursuant to section 30 of the *Ontario Energy Board Act, 1998*, Union and Enbridge shall pay the OEB's costs of, and incidental to, this proceeding immediately upon receipt of the OEB's invoice.

DATED at Toronto May 10, 2016

ONTARIO ENERGY BOARD

Original Signed By

Kirsten Walli
Board Secretary

APPENDIX A

DECISION AND ORDER ON COST AWARDS

COST CALCULATION DETAILS

BOARD FILE NO. EB-2015-0029 / EB-2015-0049

DATED May 10, 2016

EB-2015-0029 EB-2015-0049 Union & Enbridge	Fees					Disbursements			Total Claim and Allocations		
	Hours Claimed	Amount Claimed	Amount Reduced	Amount Approved a	Applicable Tax on Fees b	Amount Claimed (tax included)	Amount Reduced	Amount Approved c	Total Amount Approved a+b+c	Costs to be paid by Union	Costs to be paid by Enbridge
APPRO	296.3	81,955.00		81,955.00	10,654.15	933.22	(42.29)	890.93	93,500.08	46,750.04	46,750.04
BOMA	371.0	122,430.00	(23,826.00)	98,604.00	12,818.52	142.59		142.59	111,565.11	55,782.56	55,782.56
CME	286.8	72,948.00	(22,981.30)	49,966.70	6,495.67	3,634.40	(364.86)	3,269.54	59,731.91	29,865.96	29,865.96
CCC	182.0	60,060.00		60,060.00	7,807.80				67,867.80	33,933.90	33,933.90
Energy Probe	147.0	47,280.00	(4,950.00)	42,330.00	2,751.45				45,081.45		45,081.45
Environmental Defence	194.5	35,171.00		35,171.00	2,286.12	1,585.70	(492.56)	1,093.14	38,550.26	19,275.13	19,275.13
FRPO	75.0	24,750.00		24,750.00	3,217.50	1,722.54	(1.54)	1,721.00	29,688.50		29,688.50
GEC	1,615.55	450,139.50	(117,922.50)	332,217.00	19,611.57	10,469.38	(2,139.81)	8,329.57	360,158.14	180,079.07	180,079.07
IGUA	183.0	59,742.00		59,742.00	7,766.46	1,235.75		1,235.75	68,744.21	34,372.11	34,372.11
LPMA	134.0	44,220.00	(4,950.00)	39,270.00	5,105.10				44,375.10	44,375.10	
LIEN	123.5	31,235.00		31,235.00	4,060.55	192.08		192.08	35,487.63	17,743.82	17,743.82
OGVG	76.9	23,361.00		23,361.00	3,036.93				26,397.93	26,397.93	
OSEA	262.8	60,124.70		60,124.70	7,816.21	2,113.55	(3.25)	2,110.30	70,051.21	35,025.61	35,025.61
SEC	344.1	113,553.00		113,553.00	14,761.89				128,314.89	64,157.45	64,157.45
VECC	241.6	61,036.50		61,036.50	2,404.84	148.17		148.17	63,589.51	31,794.75	31,794.75

GRAND TOTAL

\$ 1,288,005.70

\$ 1,113,375.90 \$ 110,594.76

\$ 19,133.07 \$ 1,243,103.73 \$ 619,553.40 \$ 623,550.32