

**SERVICE QUALITY & RELIABILITY PERFORMANCE,
MONITORING & REPORTING PLAN
Town of Stowe Electric Department**

Section I: General Provisions

- 1) The purpose of this Plan is to establish performance standards, and performance monitoring and reporting for electric service provided by the Town of Stowe Electric Department ("SED"). The Plan shall be referred to throughout this document as the "Plan."
- 2) The parties to this Plan are SED and the Vermont Department of Public Service ("DPS").
- 3) Section II of the Plan establishes the definitions, measurement and reporting protocols for the performance standards. Section III of the Plan establishes minimum performance standards in each performance area. Section IV of the Plan describes service guarantees and Section V describes service quality compensation.
- 4) The Plan shall remain in effect from the beginning of the first quarter following approval by the Vermont Public Utility Commission ("Commission") until modified by a subsequent Commission order. The parties agree that they will review the Plan every two years after its effective date to determine whether modifications of measurements or performance levels in the Plan are necessary. Either party may petition the Commission for modifications of measurements or performance levels at any time during the life of the Plan.
- 5) Nothing in this Plan shall preclude the use of any other remedies available under law for addressing substandard performance to the degree that such performance has not already been addressed under the provisions of this Plan.
- 6) In the event that SED opens its territory to retail choice during the life of this Plan, the parties acknowledge additional and/or different standards may be necessary to monitor service delivery changes attendant to restructured service delivery. SED shall negotiate with the DPS additional standards should the need arise. Modifications to the Plan under this paragraph shall be submitted to the Commission for approval.
- 7) In addition to the performance standards and measurements set forth in this document, SED agrees to the following time frames for response to consumer and regulatory complaints:

- a. SED shall provide a substantive response to consumer complaints expressed directly to the company within 14 calendar days of receipt by any method of contact.
- b. SED shall provide a substantive response to consumer complaints from DPS within 14 calendar days.
- c. If SED needs additional time to respond fully to a complaint from a consumer or from DPS, SED shall, within the initial 14-day period, request a specific additional time for response and shall provide a proposed resolution within the requested additional time.

Section II: Measurement, Reporting Protocol, and Definitions

- 1) This is the successor plan submitted by SED.
- 2) Reporting periods shall be calendar quarters, with quarterly reports submitted to the DPS and the Commission by the last day of the month following the end of each quarter, except for the standards in Section III. ¶5, III. ¶6, III. ¶7a, and III. ¶7b, which shall be reported annually on a calendar year basis by January 31 of the following year.
- 3) Except as provided in Section II. ¶2, performance results shall be aggregated monthly and quarterly, and shall be reported quarterly to the DPS and the Commission. The electronic reporting form developed by SED and reviewed by DPS for quarterly filing shall be provided as an attachment to this plan.
- 4) Quarterly reports shall include both monthly and quarterly averages except service guarantee data shall only be calculated and reported as monthly totals. Quarterly averages shall be derived from raw data, not by averaging monthly averages.
- 5) Achievement of minimum standards for the purpose of calculating service quality compensation shall be determined based on a 12-month calendar average. Service quality compensation shall be calculated annually in the second quarter following the end of the calendar year. A minimum performance standard shall be considered met if the 12-month average met or was below the standard. The actual amount at risk shall be calculated each year even if all performance areas in Section V. ¶1 are met.
- 6) Notwithstanding Section II.¶5, if quarterly performance falls more than ten percent below, or does not meet the specified standard in Section III for two consecutive quarters, SED must submit a corrective action plan within 30 days of the end of the quarter in which this situation occurs. This plan should detail how SED intends to address and rectify the failed standard.

- 7) Performance shall be evaluated and reported as listed in Section III for all performance areas unless otherwise specified. Actual performance shall be reported to two decimal places for all standards and shall be rounded up when the third decimal place is 5 or more. SED will retain its data and reports that support the results for each of the performance areas for a period of not less than 24 months after the results are reported. SED will provide these reports upon request to DPS.
- 8) SED will review with the DPS any change to SED's measurement protocol or to the internal reporting methods that are used to obtain the data measured prior to SED's implementation of such changes. If the DPS and SED are unable to agree on the changes requested, nothing in this Plan shall preclude DPS or SED from seeking appropriate relief from the Commission. SED shall have an affirmative duty to report missing data or other events that could reasonably affect the quality of the data at the time SED becomes aware of such events. Any data related to the Plan reported to DPS that reflects significantly altered measurement procedures or internal data acquisition methods that have not been agreed to between SED and DPS shall be subject to challenge and potential exclusion from results.
- 9) SED may seek a waiver of any applicable performance standard from the Commission. A waiver may only be granted where the circumstances causing the failure were beyond SED's direct control, and SED can demonstrate that its level of preparedness and response was reasonable given the cause of the failure.
- 10) **Definitions:**
 - a. Disconnect/Reconnect: Electric power in a location must temporarily be disconnected and reconnected at the customer's request. The physical disconnection of the electric service cable is usually to ensure safety during work being completed at the location.
 - b. Initial/Final Read: Any customer that submits a request to SED to either establish or discontinue service at the meter.
 - c. Escalation: An escalation is a complaint to SED or to DPS in which, following investigation, it is determined there is something SED reasonably could or should have done to satisfy the consumer and thereby prevent the complaint from arising and is not contrary to any tariff filed with the Commission. Each party's discretion shall determine if a complaint to it is classified as an escalation.

- d. Grievance: A consumer complaint registered with the DPS's Consumer Affairs & Public Information Division in which one of the two following determinations is made: (1) following investigation, the DPS determines that there was nothing the company could or should have done differently before the consumer contacted DPS; or (2) DPS determines investigation is not appropriate or necessary and therefore no determination has been reached as to whether there was something the company could or should have done differently before the consumer contacted the DPS.
- e. New Line Extensions or Relocations: New service installation following the requirements in PUC Rule 5.600 in which one or more poles must be installed to carry a primary distribution circuit; and/or a primary underground distribution circuit must be installed for the purposes of servicing new customer(s). New Line Extensions follow SED's line extension tariff and require a payment by the customer for "Contributions in Aid of Construction." New Line Extensions may also include relocations made at the request of the customer or initiated by the utility for system improvements.
- f. New Service: Request from a customer for the utility to set a meter to connect the customer to SED's distribution system. SED will follow definition (e) above if the request applies to the line extension tariff.
- g. Regular Business Hours: 8:00 a.m. to 4:00 p.m. Monday through Friday excluding days on which legal holidays are observed, and SED is closed to routine business operations.
- h. Summer Business Hours (June, July & August): 7:30 a.m. to 4:30 p.m. Monday through Thursday, and Friday 8:00 a.m. to 12:00 p.m., excluding days on which legal holidays are observed, and SED is closed to routine business operations.
- i. Street Light Maintenance: SED makes repairs to SED-owned street and security lights.
- j. Street Light New Installation: SED installs street and security lighting at the request of a customer and according to the terms in SED's Rate 30 and Rate 31.
- k. Temporary Service: A secondary service is installed for a customer-specified period of time. Primary conductors exist to the site.

- l. Emergency Outage: An outage requiring immediate action resulting from severe weather, equipment failure or system disturbances caused by events outside the control of SED.
- m. Weather-related delays: These are the delays that are included in the "not ready" exclusions described in the work completion performance measure (Section III, ¶4) and (Section IV, ¶C). Weather-related delays shall be defined as provided by the relevant section of SED's union contract concerning restrictions on outside work during inclement weather. Weather-related delays shall also include periods when roads are impassable to company vehicles following heavy rain, snow or spring thaw conditions and unavailability of company personnel because of ongoing service restoration efforts due to inclement weather.

Section III: Performance Standards

1) Call answer performance measures

Since SED does not have a computerized call answering record keeping system capable of tracking call handling performance metrics, customer service call answering performance will be measured based on consumer complaints. Any consumer complaints made to DPS or SED that are determined after investigation to be "escalations" and in which the consumer complains that he or she could not reach SED, shall not exceed one per year. Should SED obtain a computerized call-answering record-keeping system capable of tracking call handling performance metrics, or should its customer base exceed 10,000 during the duration of this SQRP, then SED shall notify the DPS of its change in status within 30 days of such change. A call answering performance measure shall be established and reviewed by SED and DPS and any modifications to the existing plan shall then be submitted to the Commission. Complaints caused by storms or other widespread outages will not be included in this performance measure.

2) Billing performance measures:

- a. **Percentage of bills not rendered monthly**: This standard tracks the percentage of bills not rendered within seven (7) days of the scheduled billing date. The measurement will exclude accounts that were activated after the normal reading cycle for the current month's billing. Performance shall be calculated as follows:

$$\frac{\text{Number of bills not rendered within seven days of the scheduled billing date}}{\text{Total number of bills scheduled to be rendered.}}$$

Exclusions: The measurement will exclude accounts that were activated within 10 days prior to the normal billing cycle; accounts that are scheduled to receive a final bill within 10 days after the normal billing cycle; company-use accounts.

Performance measure: $\leq 1.0\%$

Source of data: Data compiled from SED's Customer file. Results shall be reported to the second place.

- b. **Bills found inaccurate**: Percentage of bills found inaccurate after being sent to customers, brought to SED's attention either as a result of customer complaints and/or by the utility's own efforts. Performance shall be calculated as follows:

$$\frac{\text{Number of bills rendered inaccurately for the month}}{\text{Total number of bills rendered for the billing month}}$$

Exclusions: This standard does not include bills found to be inaccurate strictly as a result of estimation, bills where the inaccuracy does not affect the calculation of the bill; or where the fault does not lie with the company (i.e. mixed meters due to erroneous customer third-party installation or software vendor errors). Multiple bills for a customer that are caused by the same error shall be counted as one incident for up to two billing cycles but thereafter shall be counted as individual incidents each billing cycle.

Performance measure: ≤ 1.0

Source of data: Data compiled from SED's Customer file.

- c. **Payment posting complaints**: Percentage of customers filing complaints ultimately classified as escalations to SED or to DPS concerning the posting of their payments to their accounts. Performance shall be calculated as follows:

$$\frac{\text{Number of customers complaining about payment posting}}{\text{Total number of customers}}$$

Exclusions: This standard does not include those complaints made where fault does not lie with SED (i.e. bank routing or software vendor errors).

Performance measure: $\leq 0.05\%$

Source of data: Data compiled from SED's Customer file.

3) **Meter reading performance measures:**

- a. **Percent of actual meter readings per month:** Percentage of meters not read each month in relation to the number that were scheduled to be read. Performance shall be calculated as follows:

$$\frac{\text{Number of meter readings not read}}{\text{Number of meter readings scheduled}}$$

Exclusions: SED completes its meter readings through its AMI network. This standard will not include meter readings that were not gathered as a result of software vendor errors or delays.

Performance measure: ≤10.0%

Source of data: Data compiled from SED's Customer file. Results shall be reported to the first decimal place. SED estimates billing for two customers that do not have AMI meters. These are reported in 3a in the Reporting Form in Attachment A.

4) **Work completion performance measures:**

- a. **Percentage of customer-requested work not completed on or before promised delivery date:** The percentage of jobs resulting from customer requests for meter-related or other customer-requested work that are not completed on or before the promised completion date. Performance shall be calculated as follows:

$$\frac{\text{Number of jobs not completed on or before promised delivery date}}{\text{Total number of jobs promised complete in reporting month}}$$

Exclusions: When an event outside of SED's control occurs resulting in the work not being completed as promised, SED will renegotiate the promised delivery date with the customer. These events include but are not limited to the following: meter socket not installed correctly; energizing permit not issued; customer site work or tree trimming not completed; customer underground conduit/trenching not completed; customer contractor related delays, weather-related delays, equipment delays, and delays created as a result of the telephone or broadband company not completing its prerequisite work within a reasonable time frame. Streetlight repair delayed due to bad underground and/or not a streetlight specific problem will be reclassified as general maintenance

work. Renegotiated jobs will be reported as "completed on or before" based on the new renegotiated date, not the original date.

Inclusions:

Customer-requested meter checks and exchanges, New Service Connections, Line Extensions & Relocations, Temporary Service, Field Reconnects, Field Disconnects, Power Quality Issues, Hazard Issues, Half Power, Tree on the Line, Line Cover Installation, Line Cover Removal, Low Wire, Temporary Disconnect/Reconnect, Service Upgrades, Street Light Installation, Street Light Maintenance, Customer Requested Service Work (including vegetation on service lines), and Net-Metering Interconnection.

Performance measure: ≤5.0%

Source of data: Manual records retained at the SED's Service Center.

- b. **Average number of days after the missed delivery date:** Average number of days after the missed delivery date in which SED was to complete meter-related or other customer-requested work. Performance shall be calculated as follows:

$$\frac{\text{Total days of delay}}{\text{Total number of delayed jobs in the reporting month}}$$

Exclusions: When an event outside of SED's control occurs resulting in the work not being completed as promised, SED will renegotiate the promised delivery date with the customer. These events include but are not limited to the following: meter socket not installed correctly; energizing permit not issued; customer site work or tree trimming not completed; customer underground conduit/trenching not completed; customer/contractor delays, equipment delays, delays created as a result of the telephone or broadband company not completing its prerequisite work within a reasonable time frame, and weather-related delays. Renegotiated jobs will be reported as "completed on or before" based on the new renegotiated date, not the original date.

Inclusions:

Customer-requested meter checks and exchanges, New Service Connections, Line Extensions & Relocations, Temporary Service, Field Reconnects, Field Disconnects, Power Quality Issues, Hazard Issues, Half Power, Tree on the Line, Line Cover Installation, Line Cover Removal, Low Wire, Temporary Disconnect/Reconnect, Service Upgrades, Street Light Installation, Street Light Maintenance, Customer Requested Service

Work (including vegetation on service lines), and Net-Metering Interconnection.

Performance measure: ≤5 days

Source of data: Manual records retained at SED'S Service Center.

- 5) **Rate of complaints to DPS/Consumer Affairs:** Percentage of customers who file complaints with DPS that are ultimately classified as escalations following investigation. Performance shall be calculated as follows:

$$\frac{\text{Number of escalations}}{\text{Total number of customers}}$$

Performance measure: ≤ 0.07%,

Source of Data: The DPS Consumer Affairs Division compiles this data, and when appropriate, the data is forwarded to SED.

- 6) **Worker safety performance measures:**

- a. **Lost-time incident rate:** Lost-time incidents are the total number of incidents experienced by SED in a calendar year that: (1) cause an injury to an employee; and (2) occur while the employee is performing work for SED; and (3) result in the employee missing work beyond the day of the injury.

Performance measure: ≤ 2

Source of data: Lost-time cases reported in SED'S VOSHA Accident Log.

- b. **Lost-time severity rate:** Lost-time severity shall be the cumulative number of work days missed by SED employees in a calendar year as a result of injuries sustained by the employees while performing work for SED.

Performance measure: ≤ 18

Source of data: Employees' lost days are recorded in the SED's VOSHA Accident Log.

- 7) **Reliability performance measures:**

- a. **System average interruption frequency (SAIFI):** This standard is defined in Commission Rule 4.901 and shall be established for the system as a whole.

Performance measure: SED's baseline measure for SAIFI is 0.9.

Source of Data: Commission Rule 4.900 Annual Reporting.

- b. **Customer average interruption duration ("CAIDI"):** This standard is defined in Commission Rule 4.901 and shall be established for the system as a whole.

Performance measure: SED's baseline measure for CAIDI is 3.3.

Source of Data: Commission Rule 4.900 Annual Reporting.

- c. **Worst-Performing Areas:** For each calendar year, SED shall identify the areas on its system where most outages occur, assess the underlying cause for each outage, and institute economically feasible action plans or activities to improve the reliability of these areas in accordance with Commission Rule 4.903. All areas where action plans or activities have been instituted shall be monitored each year, over a five-year period, to determine the effectiveness of the improvement measures and to identify further measures that may be required.
- d. **Major Storms:** Calculation of all SAIFI and CAIDI indices shall be net of outages caused by major storms. A major storm is defined as a severe weather event that satisfies the following criteria:

- i. Extensive mechanical damage to the utility infrastructure has occurred;
- ii. More than 10% of the customers in a service territory are out of service due to the storm or the storm's effects; and
- iii. At least 1% of the customers in the service territory are out for at least 24 hours.

Section IV: Service Guarantees

- 1) SED shall offer the following service guarantees subject to Commission approval of necessary tariff amendments:
 - a. **Line Crew Appointments:** In the case where an appointment for the line crew is made to do work at a customer premise, SED shall provide a

credit of \$5.00 if the crew does not show up within a 4-hour window of the time the work was scheduled, or by the end of the agreed day if no appointment time was scheduled.

- b. Meter work: SED shall provide a credit of \$5.00 to any customer whose meter work order is not completed within 2 business days of the promised delivery date on the service order.
 - c. Delay days: SED shall provide a credit of \$5.00 to any customer whose line work is not completed within 5 business days of the promised delivery date assuming the customer has met his or her requirements and is ready. This includes: line extensions; new service; disconnect/reconnects; new street/security light installations; street/security light maintenance; and temporary service connections. This excludes any work that results in reporting of lost time due to worker safety performance measures Section III, ¶16, (c) or (d) and shall not be eligible for this credit.
- 2) All credits owed to ratepayers as a result of SED's failure to meet the timelines described above in Section IV, ¶1 will automatically be credited without the customer having to notify SED. In the event a customer who is due a credit no longer has an account with SED at the time SED determines a credit is due, SED shall mail a check for the credit amount to the customer's last known address. All unclaimed funds will follow legal requirements regarding abandoned property. The total number of service guarantees issued and total dollar amount paid for the quarter shall be reported as described in Section II, ¶4.
 - 3) Service guarantees that are not met as a result of weather-related delays, defined in Section II, ¶10, (m), will not be eligible for this program.

In addition to the above Service Guarantees, SED offers to implement its proposed amendment regarding the provision of service quality performance information to its customers and governing body as provided in item 4), 5) and 6) below.

- 4) Upon approval of the Plan by the Commission, SED will notify, in writing, all ratepayers in its service territory, that SED has a Service Quality and Reliability Plan, The notice will describe the purpose and general detail of the Plan.
- 5) During the first meeting of SED's governing body that follows the quarterly filing of the SQRP report to the Department and Commission, SED will present that report for discussion and review.

- 6) SED's Annual Report will contain a section about Service Quality and Reliability where the annual SQRP report to the Department and Commission will be published

Section V: Service Quality Compensation

- 1) Failure to meet the standards in performance areas Section III, ¶13, ¶15, and ¶17 (a) & (b) shall result in the calculation of service quality points.
- 2) Attachment A sets forth which performance measures are subject to the calculation of service quality compensation points. Points are assigned for areas subject to service quality compensation based on actual performance during the 12-month reporting period. Actual performance shall be compared to the performance measure. The deviation of the actual performance compared to the performance measure is expressed as a percent deviation from the performance measure. This percent deviation shall be expressed as points by multiplying the percent (as expressed as a decimal) by 100 so that each point equals one percent deviation from the baseline. No points are assigned if SED achieves results equal to or better than the performance measure. When SED performs worse than the performance measure, the applicable points are calculated for each performance measure and totaled. The total of these points is referred to as "service quality compensation points."
- 3) A dollar amount will be assigned to service quality compensation points as shown in Attachment B. Service quality compensation dollars are assessed on a sliding scale up to a maximum one-year total of 0.1% of SED's "total revenue" as reported by SED as annual revenues in SED's gross receipts tax filing for the 12-month reporting period. For 2025, the estimated amount at risk would be \$16,439.69 for a maximum of 150 service quality compensation points. The actual amount at risk shall be calculated each year even if all performance areas in Section V, ¶11 are met. This calculation shall be reported as a part of the annual reporting described in Section II, ¶15 and Section V ¶16 below.
- 4) Service quality compensation points are divided into two categories. Sixty percent, or 90 points, are allocated to the reliability measures (Section III, ¶17 (a) & (b)). The remaining forty percent, or 60 points are allocated to the remaining measures for which points are assessed (Section III, ¶13 and ¶15).
- 5) A dollar amount is assigned to each service quality compensation point within a range in its category. While calculating compensation points and assigning dollar amounts the compensation points must be rounded up or down to the nearest whole number throughout the calculation process. The service quality compensation dollars are calculated incrementally, that is, service quality compensation dollars are calculated first at the bottom tier for the applicable

service quality compensation points. The next range of points is multiplied by the next highest dollar amount. The first 20 points in the reliability category are worth nothing per point.

- 6) Service quality compensation dollars shall be paid to community service activities. SED shall report the actual amount at risk for service quality compensation annually in the second quarter following the end of the calendar year, regardless of whether or not all performance areas in Section V, ¶1 are met.. SED shall also propose at the time of its annual service quality filing the manner of communication to its customers concerning its service performance for the prior twelve (12) month period. The manner of communication shall include a report of results and an explanation of service quality compensation to be paid, if any.
- 7) The service quality compensation dollars paid shall be offset by any dollars paid to customers through the service guarantees in Section IV.
- 8) The DPS shall file any objection to the service quality compensation calculation and manner of customer communication within 30 days after SED files its proposal. If the Department files no objection within 30 days, and the Commission takes no action within 60 days, the filing will be deemed accepted and approved. If the DPS files a timely written objection, the Commission will proceed to resolve the dispute.
- 9) If in any year SED meets all baselines and produces results 10 percent better than each of performance measures Section III, ¶3, ¶5, and ¶7 (a) & (b) requires, then SED may carry over a balance of -25 service quality compensation points that may be deducted from any points earned in the following year.

Attachment A - Stowe Electric Performance Area and Measures Table

	Performance Area	Performance Measure	Service Quality Compensation	Service Guarantees
Section III: Call Answer Performance				
1	Number of calls where consumers complain to DPS that utility cannot be reached (Escalations)	≤ 1	No	No
Billing Performance				
2a	Bills not rendered monthly within 7 days	$\leq 1.00\%$	No	No
2b	Bills found inaccurate	$\leq 1.00\%$	No	No
2c	Payment posting complaints	$\leq 0.05\%$	No	No
Meter Reading Performance				
3a	Percentage of meters not read	$\leq 10.0\%$	Yes	No
Work Completion Performance				
4a	Percentage of customer requested work not completed by promised delivery date, less exclusions	$\leq 5.0\%$	No	Yes
4b	Average number of days after missed delivery date	≤ 5 days	No	Yes
Escalations Performance Measure				
5	Percentage of ratepayer complaints to DPS	$\leq 0.07\%$	Yes	No
Worker Safety Measures				
6a	Lost time incident	≤ 2	No	No
6b	Lost time severity	≤ 18 days	No	No
Reliability Performance Measures				
7a	SAIFI - System average interruption frequency	≤ 0.9	Yes	No

	(reported annually in January)			
7b	CAIDI - Customer average interruption duration (reported annually in January)	≤ 3.3	Yes	No
Section IV: Service Guarantees				
1a	Line Crew Appointments – 2hr window or end of day scheduled		No	Yes
1b	Meter Work – 2 business days of promised delivery date		No	Yes
1c	Delay Days – 5 business days of promised delivery date		No	Yes

Attachment B
Town of Stowe Electric Department
Service Quality Compensation Cap and Point

Attachment B: Town of Stowe Electric Department						
Service Quality Compensation Cap and Points						
Maximum annual service quality compensation						
			Maximum compensation	Avg cost/point (150 pt cap)		Taxable GOR Reported
			16440	110		\$16,439,692.12
Allocation of points between plan components				Maximum Points	Actual Points	
	Reliability			60%	90	90
	All other points based measures			40%	60	60
Sliding point scale based on cap						
	Max at risk for reliability			\$ 9,864		
	Max at risk for all other points based measures			\$ 6,576	\$ 16,440	
RELIABILITY CALCULATION						
Point ranges	Pts in range	Weighting	Per point	Max/level	Cumulative	
71 to 90	20	2.188	\$ 240	\$ 4,795	\$ 9,864	
46 to 70	25	1.000	\$ 110	\$ 2,740	\$ 5,069	
21 to 45	25	0.850	\$ 93	\$ 2,329	\$ 2,329	
0 to 20	20	0.000	0	0	0	
Total	90			\$ 9,864		
OTHER MEASURES CALCULATION						
Point ranges	Pts in range	Weighting	Per point	Max/level	Cumulative	
45 to 60	15	1.350	\$ 148	\$ 2,219	\$ 6,576	
31 to 44	15	1.000	\$ 110	\$ 1,644	\$ 4,357	
16 to 30	15	0.900	\$ 99	\$ 1,480	\$ 2,713	
0 to 15	15	0.750	\$ 82	\$ 1,233	\$ 1,233	
Total	60			\$ 6,576		
* Maximum dollars at risk calculated as an example based upon 2024 total revenue.						
CALCULATIONS						
Total Reliability Comp Dollars			\$ 9,864	Total Comp Dollars Due		
Total Other Measures Dollars			\$ 6,576	\$ 16,440		
Less Service Guarantees Paid			0			
Carry-Over Points From Prior Year			0			