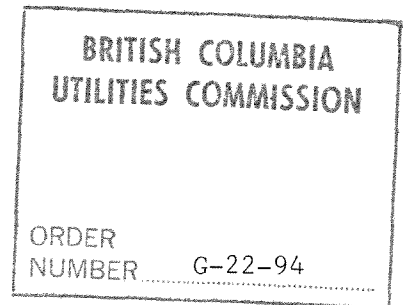


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AN ORDER IN THE MATTER OF the Utilities Commission
Act, S.B.C. 1980, c. 60, as amended

and

A Rate Application by Hemlock Valley Electrical Services Limited

BEFORE: M.K. Jaccard, Chairperson; and)
K.L. Hall, Commissioner) March 18, 1994

ORDER

WHEREAS:

- A. On August 3, 1993 Hemlock Valley Electrical Services Limited ("HVES") applied for Commission approval of a general interim increase in rates of \$0.0194 per kW.h to all customers effective September 1, 1993; and
- B. The application for increased rates is a result of increased operating and maintenance costs of the utility and an increase in power purchase costs from British Columbia Hydro and Power Authority that have not been passed-through to HVES' customers; and
- C. Pursuant to Sections 64 and 67 of the Utilities Commission Act, Commission Order No. G-91-93 approved for HVES an interim increase of \$0.0194 per kW.h in electricity rates effective September 1, 1993, subject to refund with interest at the average prime rate of the principal bank with which HVES deals; and
- D. Commission Order No. G-91-93 also required HVES to undertake a "town hall" meeting with its customers to explain, answer questions and provide justification for the rate increase; and
- E. The Commission has reviewed the Rate Application, Submissions and Reply, all as set forth in the Reasons for Decision attached as Appendix A of this Order.

NOW THEREFORE the Commission orders HVES as follows:

1. The Rate Base and Revenue Requirements for the test year ending April 30, 1994 are as set out in the Schedules attached to this Order.

2. The Commission will accept, subject to timely filing, amended Electric Tariff Rate Schedules which conform to the terms of the Commission's Reasons for Decision and Schedules attached as Appendix A to this Order.
3. HVES is to proceed with refunds to its customers of record on and after September 1, 1993, where necessary. Such refunds are to include interest calculated as specified in Commission Order No. G-91-93.
4. HVES is to provide all customers with a copy of this Order.

DATED at the City of Vancouver, in the Province of British Columbia, this *25th* day of March, 1994.

BY ORDER



Dr. Mark K. Jaccard
Chairperson

Attach.

REASONS FOR DECISION

1.0 INTRODUCTION

Hemlock Valley Electrical Services Limited ("HVES") applied August 3, 1993 for approval of a general increase in rates of 1.94¢ per kW.h effective September 1, 1993. This increase included an amount of .26¢ per kW.h for the April 1, 1993 3.9 percent British Columbia Hydro and Power Authority ("B.C. Hydro") rate increase approved by the B.C. Utilities Commission ("the Commission"). The increase attributable to HVES costs of operation was 1.68¢ per kW.h. The last general rate increase was a 2.00¢ per kW.h increase as at September 1, 1991.

Commission Order No. G-91-93 approved the increase on an interim basis, subject to refund, and directed HVES to undertake a "town hall" meeting in a suitable location, after which the Commission would accept customer submissions, an HVES response, and then would make a final determination on the Rate Application. The town hall meeting and procedures set up by Commission Order No. G-91-93 have been met by the parties to the Application and all correspondence and submissions received were reviewed by the Commission.

There are a number of historical events and relationships involving the utility, the customers, the Commission and the Courts leading up to, and shaping this application and its review. These issues are unique to the HVES situation and can be grouped under the headings of:

1. Fairness and reasonableness of HVES rates as compared to B.C. Hydro.
2. Potential for B.C. Hydro Takeover (obligation to serve).
3. Rate Base existence.
4. Safety concerns raised by various customers.
5. Court of Appeal award.
6. Costs involved in conducting a public hearing.

Some of the background is evident from the recent correspondence and submissions, but persons wishing to learn more detail about the past events not covered in these Reasons should review the previous Commission Decisions upon which this Order is also based.

2.0 APPLICATION

The Application's forecast test year is May 1, 1993 to April 30, 1994, although the interim did not take effect until September 1, 1993. The main reasons given for the requested 11.6 percent increase are:

1. A reduction in forecast consumption from that shown in the 1993 test period (1,666,667 kW.h) to 1,500,000 kW.h. This amount, however, is actually an increase over the actual fiscal 1993 level of 1,416,168 kW.h.
2. The resumption of amortization of the prior years' rate application costs temporarily deferred by Commission Order No. G-10-93.
3. A 5.7 percent increase in O&M over the forecast fiscal 1993 levels. The total 1994 forecast expense of \$72,136 was 14.7 percent higher than fiscal 1993 actuals but was amended to \$66,175 in December 1993 to correct for an error, resulting in a 5.2 percent increase over 1993.

The deemed ratio of debt to equity and the rates of return have been maintained at 50/50 and 13 percent, respectively, in accordance with Commission Decision and Order No. G-77-90. The Company has never achieved the 13 percent return, although it came close in 1993 when its rate application costs were deferred.

Although the Company forecasts a need for \$11,500 of additional equipment, the forecast rate base is actually 2.1 percent smaller than mid-year 1993 levels due to depreciation and amortization and does not form a part of the current rate increase.

3.0 INFORMATION REQUESTS

The Commission Staff Information Request was sent August 10, 1993, responded to on September 20, 1993 and copies were made available to interested parties. A second Information Request was sent on February 17, 1994 and responded to on March 4, 1994.

The Hemlock Valley Homeowners Association ("HVHA") hired a consultant to review the Application and made its own Information Requests on October 28, 1993 and November 3, 1993. Those questions considered relevant by the Company were answered by November 20, 1993 (although not received by the HVHA until after the town hall meeting).

4.0 TOWN HALL MEETING

The meeting was required by the Commission to avoid the costs of a public hearing but to still allow interested parties an opportunity to meet the Company representatives, voice their concerns, get answers to questions, and furnish enough evidence for them to make informed submissions. In its October 20, 1993 letter to the Commission, the HVHA welcomed the new initiatives taken by the Commission and shared its concerns with regard to costs. HVES formally presented notice of the meeting to all customers in its October regular billing. Correspondence between HVES and HVHA indicate some difficulties in establishing timing and ground rules, but the meeting was finally held on November 20, 1993 at Hemlock Valley.

According to the Company, the overall format was established in advance with the HVHA, and attendance consisted of 79 owners and three visitors. The meeting was conducted by a professional Chair and facilitator with participation by the Company's consultant and Peat Marwick Thorne accountant. The HVHA expressed its concern that the Company's president did not attend.

5.0 SUBMISSIONS

After the town hall meeting, submissions to the Commission were made by Mr. G. Laryl, Mr. M. Staley, Mr. and Mrs. R. Mazur, and the HVHA.

Laryl Submission

Mr. Laryl raises the Rate Base issue, the Safety issue, the B.C. Hydro Takeover issue, allocation of telephone costs and questions why HVES does not recover the cost of damage to transformers from Hemlock Valley Resorts Inc. ("HVRI") as their equipment is used to clear the snow.

Staley Submission

Mr. Staley's primary concern is the near and long-term viability of HVES. The charts he prepared purport to show that there is no price and consumption level where HVES will be able to meet its costs. When asked during the town hall meeting, the representatives responded that they were confident in their consumption projections based on weather, new customers and propane and conservation measure saturation. Mr. Staley notes that no one can predict the weather, that the average past rate is three new customers per year, and that more than half the audience had not yet converted to propane.

Mr. Staley provides three restructuring scenarios:

1. Negotiated agreement for B.C. Hydro Takeover (seen as unlikely).
2. Forced takeover by B.C. Hydro (unfamiliar with Commission authority in this regard).
3. Customer disconnection and self-generation of power (the ultimate "perverse and inefficient" conclusion if the Commission approves the rate increase).

Mazur Submission

Mr. and Mrs. Mazur rely on Mr. Staley's evidence and raise the same issues. In addition, they asked the utility to provide documentation on competitive debt financing. This was provided and is a part of the HVES Reply received by the Commission, arguing that, on a stand-alone basis, the utility would be unable to obtain any financing, but, if it could be done, the interest rate would be 14-18 percent.

HVHA Submission

The HVHA's consultant prepared a binder for the Commission with copies of the Application, Information Requests, correspondence, and previous Decisions as part of its submission. The HVHA submits:

1. The interim increase should be refunded.
2. The new rate should be 12.4¢ per kW.h, effective September 1, 1993.
3. A competitive rate or range of rates be established, inclusive of a utility incentive, to recover the load lost to propane.
4. A formal inquiry/hearing be undertaken into the operations and plant in service which, in its submission, will result in rates of less than 9.6¢ per kW.h.

The HVHA provides adjustment schedules for the Commission and cites duplication of costs, excessive deemed costs of debt, excessive proposed return on equity, the inclusion of facilities only benefiting future customers, and common ownership as the justification.

6.0 UTILITY REPLY

HVES's lawyer provided a response to the HVHA submission on January 14, 1994. The Utility notes that many of the points raised in the correspondence of the individual homeowners have been previously raised before the Commission and were dealt with in the 1990 Decision or the Court of Appeal. Accordingly, HVES does not re-address them but requests that the Commission advise HVES if it decides

to reconsider any of these items (specifically the original rate base issue, return on rate base, B.C. Hydro takeover, and cost of damage to transformers). They refer to recent regulatory decisions for more financially sound utilities awarding 11-13 percent returns on equity and submit 13 percent is reasonable for HVES.

7.0 COMMISSION DETERMINATIONS

The Commission does not propose to re-review those historical issues referred to by interested parties but dealt with in previous Decisions or examinations by Commission Staff and the Electrical Safety Branch, as no new evidence was provided to the Commission. Instead, the review concentrates on the reasonableness of the revenues and costs of the forecast test period in the Rate Application.

Plant in Service

The Underground Conductors and Devices May 1, 1993 opening balance in the Application is \$9,022 greater than the amount reported in the Company's 1993 financial statements. The Commission's adjustment corrects this error.

Plant Additions - \$11,500

The Application forecasts the need for a \$6,000 transformer to replace the one located adjacent to the maintenance compound. HVHA noted the Company has transformers in inventory and questioned why new transformers were needed.

The Application also forecast that meters were required for unmetered HVRI accounts in accordance with the Commission's 1990 Decision. As these areas are presently unmetered, the Company allows for an 11 percent line loss and HVRI pays for the difference between the B.C. Hydro purchases and the residential consumption. However, unless demand meters are installed, the Company will be unable to fully determine the cost of service imposed by HVRI, an ongoing concern of the customers. The Commission did not require this to be installed in the past as the cost is so high.

The Company's Information Response indicates that it is unlikely to install these in fiscal 1993-94 and the Commission has removed them from the Schedules.

Depreciation and Amortization

Plant in service, Contributions in Aid of Construction, Appeal and Application costs have all been calculated at Commission-approved rates. The HVHA schedules deferred recovery of the Application costs and recommends the Appeal costs be amortized over 20 years. The Commission made no adjustment in this matter.

Rate Application Costs

The \$2,700 forecast for the 1993-94 Rate Application cost is the same as that charged for the last Application.

The HVHA submits that if the Applicant is totally unsuccessful, all costs should be borne by the Applicant (presumably they mean the shareholder). They also submit that the innovative process initiated by the Commission has resulted in lower cost than would have been incurred and recommend the Commission move toward an incentive process to further reduce costs. The added cost to HVES for the Town Hall meeting was \$7,938 and the HVHA consultant fees are \$5,827.

Although normally such proceedings costs are charged to the utility and recovered in customer rates, due to the small size of the utility and the representations of the HVHA, the Commission will pay the costs of the town hall meeting and the HVHA consultant from its Participant Funding budget. Consequently, the amounts have been adjusted out of the Decision schedules.

Sales Volume

The Company reduced the level of forecast consumption in its previous Application from 1,666,667 kW.h to 1,500,000 kW.h for 1993-94. This amount is still higher than the 1993 actual figure of 1,416,000 kW.h. A review of the year-to-date 1993-94 meter data suggests that the final level will be closer to 1,300,000 kW.h and the Commission has adjusted the schedules accordingly.

The HVHA and other customers recognize that the forecast is probably high but did not make an adjustment in its schedules. The HVHA anticipates that when the new meters are installed there will be a reduction in line losses and an increase in commercial sales. This may be the case, but there will be no impact on the revenue requirement itself. The 11 percent line loss number was originally determined by the Commission's engineer in 1987 and resulted in higher bills to HVRI and lower operating expenses for the utility.

Probably the level of snow in any given year has the greatest impact on consumption since this is mainly a resort area. However, as rates increase, more cabins have been converting to propane as a substitute for electric heat. The HVHA submits that a competitive rate should be established at a level covering only the variable cost (being basically the B.C. Hydro rate) to recover this load. Any incremental revenue above this should be divided 75 percent to a deferred account for the existing customer and 25 percent to the shareholders. The submission does not say whether they feel a customer would have to convert first to obtain this rate or only threaten to convert. There would be no impact on the overall revenue requirement for 1993-94, so no adjustment has been made.

Power Purchases

The Company purchases all its power from B.C. Hydro under Rate Schedule 1211. It used an average cost of power of 5.77¢ per kW.h (based on its 1992 Application) and added the 3.9 percent interim increase granted by the Commission, effective April 1, 1993. The amount was applied against forecast consumption using an 11 percent line loss as allowed in the last Decision. The average year-to-date cost of power from B.C. Hydro is 5.43¢ per kW.h and, in its response to Commission Staff's Information Request, the Company acknowledged the Application amount was overstated. The Commission adjusted the Decision schedules to lower the power purchase cost, after annualizing for the B.C. Hydro rate increase.

Operating and Maintenance Costs

HVES has basically applied for just under \$50,000 for administrative services, being mainly allocated costs broken down into various categories. The HVHA put forth its own figures as being equally reasonable and called for a Commission Inquiry or Hearing because of the differences.

After extensive questioning of the utility in the 1990 Public Hearing, the Commission determined that \$43,000 would be a fair and reasonable amount to cover the costs of administration, accounting and office services for that test year. Later, the Commission approved the addition of management fees. As a comparison, Yoho Power Ltd., another small utility regulated by the Commission was charged over \$50,000 for administrative services by its shareholder in its 1993 Annual Report, in addition to the \$62,000 cost of an on-site person to handle the generation and distribution plant. The Commission considers the HVES costs to be reasonable.

Capitalization

The Company currently has no viable capital structure of its own. Its financing has been by way of loans from the parent company. The last Decision approved a deemed 50/50 percent debt/equity ratio. While 50 percent equity is much higher than would be usual for utilities in general, the higher proportion of equity in this case was considered as reasonable, bearing in mind the relative risks in the case of the Company.

The Company has proposed no change in the currently approved return of 13 percent on the debt component, and 13 percent on the equity component of the rate base. At the time of the Decision, the Commission believed this fell within a reasonable range of returns for even less risky utilities, but stated:

"While it is true that risky investments typically command higher returns, that position considers primarily the potential investors' point of view in placing funds at the utility's disposal. From the existing shareholders' point of view, the realization of an allowable rate of return depends upon the ability of management to run an efficient organization, and for external factors to favourably affect the prosperity of the Company. Bearing in mind the inter-relationship of the resort and utility elements at Hemlock, and the current circumstances of the utility, the Commission cannot accept a return on equity for rate-making purposes of 15 percent. For the foregoing reasons, the Commission believes that a 13 percent return on debt, and a 13 percent return on equity is both just and reasonable within the spirit of Sections 65(3) and 65(4) of the Act...."

HVHA proposes that the returns be adjusted to 6 percent for debt and 10.6 percent for equity to reflect the cost attributed to Hemlock Valley Water Services Ltd. The circumstances are not similar and the water service company is not regulated by the Commission.

The Utility's counsel argued that the town hall meeting is not the venue to change the approved rates of return. The Commission agrees. However, even though the costs of a public hearing and expert witnesses are too great to consider a separate proceeding for such a small utility, changing economic circumstances must be recognized. In an attempt to reduce costs for a number of utilities under its jurisdiction, the Commission has set up a joint hearing beginning April 5, 1994 to deal with the rates of return and capital structures for BC Gas Utility Ltd., Pacific Northern Gas Ltd. and West Kootenay Power Ltd. The Commission has determined that it will be more appropriate to utilize the evidence from this generic hearing to set a new return and notional capital structure for HVES in future fiscal periods.

UTILITY RATE BASE SCHEDULE 1		1993/94 APPLICATION	BCUC ADJUSTMENT	NO.	1993/94 ADJUSTED
ASSETS					
Structures and improvements		\$5,560			\$5,560
Overhead conductors and devices		44,891			44,891
Underground conductors and devices		497,004	(9,022)	[2]	487,982
Line transformers		90,693			90,693
		-----	-----		-----
PLANT IN SERVICE, opening		\$638,148	(\$9,022)		\$629,126
Additions to plant in service		11,500	(11,500)	[5]	0
Disposals		0			0
		-----	-----		-----
PLANT IN SERVICE, closing		649,648	(20,522)		629,126
Less:					
Accumulated Depreciation		(252,306)	271	[9]	(252,035)
		-----	-----		-----
NET PLANT IN SERVICE, CLOSING		397,342	(20,251)		377,091
NET PLANT IN SERVICE, OPENING		404,538	(9,022)		395,516
		-----	-----		-----
MID-YEAR PLANT		400,940	(14,637)		386,303
		-----	-----		-----
RATE APPLICATION		13,325			13,325
APPEAL COSTS		20,864			20,864
CONTRIBUTIONS IN AID		(64,589)			(64,589)
		-----	-----		-----
UTILITY RATE BASE		\$370,540	(\$14,637)		\$355,903
		=====	=====		=====
RETURN ON RATE BASE		13.00%			13.00%

UTILITY INCOME & RETURN SCHEDULE 2		1993/94 APPLICATION	BCUC ADJUSTMENT	NO.	1993/94 ADJUSTED
SALES VOLUME MWh		1,500	(120)	[7]	1,380
		=====	=====		=====
RATES					
Existing Revenue: ¢/kWh		14.51			14.51
Interim Increase %		11.61%	1.01%		12.62%
Final Increase %		13.35%	-2.76%		10.59%
Increase in Rate: ¢/kW.h		1.94	-0.40		1.54
Final Rate: ¢/kWh		16.45	-0.40		16.05
REVENUE					
Existing Rates		\$217,650	(\$17,412)		\$200,238
Minimum Bill		\$13,096			13,096
Interim Rates		25,271			25,271
Required Increase		3,784	(7,850)		(4,066)
Other Income					0
		-----	-----		-----
TOTAL REVENUE		259,801	(25,262)		234,539
Less: PURCHASED POWER		101,031	(16,843)	[6,7]	84,188
		-----	-----		-----
GROSS MARGIN		158,770	(8,419)		150,351
% excluding Other Income		61.11%	2.99%		64.10%
Operating, Maintenance and Vehicle		72,136	(5,961)		66,175
Snow Removal		0			0
Depreciation		18,696	(271)	[8]	18,425
Amortization of CIAC		(3,106)			(3,106)
Amortization of Rate Application		9,784			9,784
Amortization of Appeal Costs		5,961			5,961
		-----	-----		-----
OPERATING EXPENSES		103,471	(6,232)		97,239
		-----	-----		-----
Utility income before tax		55,299	(2,187)		53,112
INCOME TAX EXPENSE		7,129	(281)		6,848
		-----	-----		-----
EARNED RETURN		\$48,170	(\$1,906)		\$46,264
		=====	=====		=====
RETURN ON RATE BASE		13.00%			13.00%

INCOME TAXES SCHEDULE 3		1993/94 APPLICATION	BCUC ADJUSTMENT	NO.	1993/94 ADJUSTED
UTILITY INCOME BEFORE TAX		\$55,299	(\$2,187)		\$53,112
Deduct - interest		(24,085)	952		(23,133)
		-----	-----		-----
ACCOUNTING INCOME		31,214	(1,235)		29,979
Timing differences					
Depreciation		18,696	(271)		18,425
Amort. of hearing costs		9,784			9,784
Amortization of Appeal costs		5,961			5,961
Capital cost allowance		(15,590)			(15,590)
Amort. of contributions		(3,106)			(3,106)
Overhead capitalized		0			0
Plant removal costs		0			0
Rate application costs		(2,700)			(2,700)
Appeal costs		0			0
		-----	-----		-----
		13,045	(271)		12,774
		-----	-----		-----
TAXABLE INCOME		\$44,259	(\$1,506)		\$42,753
		=====	=====		=====
Income tax rate - deferred		22.84%			22.84%
Income tax rate - current		22.84%			22.84%
Income tax expense					
- Deferred		(\$2,978)	\$61		(\$2,917)
- Current		10,109	(344)		9,765
		-----	-----		-----
INCOME TAX EXPENSE		\$7,131	(\$283)		\$6,848
		=====	=====		=====

RETURN ON CAPITAL SCHEDULE 4		1993/94 APPLICATION	BCUC ADJUSTMENT	NO.	1993/94 ADJUSTED
Demand Loan		\$0			\$0
proportion		.00%			.00%
embedded cost		10.75%			10.75%
\$ return		\$0			\$0
Intercompany Loan		\$145,155			\$145,155
proportion		39.17%	1.61%		40.78%
embedded cost		13.00%			13.00%
\$ return		\$18,870			\$18,870
Notional debt		\$40,115	(\$7,319)		\$32,796
proportion		10.83%	-1.62%		9.21%
embedded cost		13.00%			13.00%
\$ return		\$5,215	(\$952)		\$4,263
Preferred shares		\$0			\$0
proportion		.00%			.00%
embedded cost		.00%			.00%
\$ return		\$0			\$0
Common equity		\$185,270	(\$7,318)		\$177,952
proportion		50.00%			50.00%
ROE		13.00%			13.00%
\$ return		\$24,085	(\$954)		\$23,131
TOTAL CAPITAL		\$370,540	(\$14,637)		\$355,903
		=====	=====		=====

OPERATING EXPENSES SCHEDULE A		1993/94 APPLICATION	BCUC ADJUSTMENT	NO.	1993/94 ADJUSTED
Accounting and Legal Consulting Professional Services		\$8,800	(\$5,961)	[1]	\$2,839 0
		8,800			2,839
Bad Debts		1,800			1,800
Insurance		3,131			3,131
Bank Charges and Interest		30			30
Management Fees		6,000			6,000
Administrative Salaries		34,000			34,000
Wages and Benefits		40,000			40,000
Computer		1,100			1,100
Office and Sundry		2,500			2,500
Office Rent		2,400			2,400
Telephone		2,775			2,775
Office Supplies and Expenses		8,775			8,775
Repairs and Maintenance		4,500			4,500
Vehicle		1,200			1,200
Contractor		3,200			3,200
Equipment Rental					0
Repairs and Maintenance		8,900			8,900
Property Taxes		500			500
Annual Meter Testing		200			200
UTILITY OPERATING EXPENSES		\$72,136 =====	(\$5,961) =====		\$66,175 =====

Deferred Costs		1993/94 APPLICATION	BCUC ADJUSTMENT	NO.	1993/94 ADJUSTED
Rate Application					
Opening Balance		\$16,867			\$16,867
Costs 1990		0			0
Costs 1991/92 App.		0		[10]	0
Costs 1992/93 & 1993/94 App.		2,700	0	[3,8]	2,700
		-----	-----		-----
		19,567			19,567
		-----	-----		-----
Amortization 1990 costs - 3 years		5,834			5,834
Amortization 1991 costs - 2 years		1,250			1,250
Amortization 1992 costs - 2 years		1,350			1,350
Amortization 1993 costs - 2 years		1,350	0	[4,10]	1,350
		-----	-----		-----
		9,784			9,784
		-----	-----		-----
Closing Balance		\$9,783			\$9,783
		=====	=====		=====
UTILITY APPLICATION COSTS midyear		\$13,325			\$13,325
Appeal Costs					
Opening Balance		\$23,844			\$23,844
1991 Costs		0			0
Appeal Amortization - 5 years		5,961			5,961
		-----	-----		-----
Closing Balance		17,883			17,883
		=====	=====		=====
APPEAL COSTS midyear		\$20,864			\$20,864
CIAC					
Opening Balance		\$66,142			\$66,142
Amortization	\$106,000	3,106			3,106
Closing Balance	2.93%	63,036			63,036
UTILITY CONTRIBUTIONS - midyear		\$64,589			\$64,589

ADJUSTMENTS	
1. \$ 5,961	To remove duplication of accounting fees in Application.
2. \$ 9,022	To adjust opening balance to agree to 1993 Annual Report.
3. \$ 5,827	To add HVHA consulting fees to cost of Application.
4. \$ 6,883	To amortize new Application costs over 2 years.
5. \$ 11,500	To remove plant additions not made in test period.
6. \$ 9,108	To adjust for error in calculating BC Hydro power purchase rate.
7. 120 MW.h	To adjust consumption for impact of warm weather, based on YTD results.
8. \$ 7,938	To adjust for cost of Town Hall meeting.
9. \$ 271	To adjust depreciation for change in opening plant balance.
10. \$ 13,765	To remove Town Hall Meeting costs and HVHA Consultant fees to be paid by BCUC Participant Funding.