



FEMA

May 26, 2021

Mr. Manuel Laboy
Executive Director
Central Office for Recovery,
Reconstruction and Resilience, COR3
Governor's Authorized Representative
Commonwealth of Puerto Rico
P.O. Box 195014
San Juan, PR 00918-5014

Ms. Maricarmen Rivera
PR Electric Power Authority
#1110 Ponce de León Avenue
San Juan, Puerto Rico 00936

Re: FEMA-4339-DR-PR,
Puerto Rico Electric Power Authority, PA ID 000-UA2QU-00
Grants Manager/Portal Project No. 49797, Project Worksheet 251
FEMA Public Assistance Eligibility Determination

Dear Mr. Laboy and Ms. Rivera:

The Department of Homeland Security's Federal Emergency Management Agency (FEMA) has determined that the costs described in the referenced Grants Manager/Portal Project and Project Worksheet are ineligible for Public Assistance funding. Please see the enclosed FEMA Public Assistance Determination Memorandum for detailed information on this determination.

Under Section 423 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act and applicable regulations, the PR Electric Power Authority (Applicant) is entitled to appeal this eligibility determination to the FEMA Region II Regional Administrator.¹ Pursuant to 44 C.F.R. §206.206, the appeal must: (1) contain documented justification supporting the Applicant's position, (2) specify the monetary figure in dispute, and (3) cite the provisions in federal law, regulation, or policy with which the Applicant believes the initial action was inconsistent. The Applicant should also include a current email address to receive electronic correspondence. An appeal must be submitted to the Grantee by the Applicant within 60 days of the Applicant's receipt of this letter. The Grantee has 60 days from the date of receipt of the Applicant's appeal to forward the appeal, with its recommendation, to FEMA Region II, Recovery Division, 26

¹ 42 U.S.C. § 5189a and 44 C.F.R. § 206.206.

Mr. Laboy and Ms. Rivera
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Federal Plaza, Room 1807, New York, New York 10278. If sending appeal by UPS/FedEx (Overnight Services), send to FEMA Region II, Recovery Division, One World Trade Center, 52nd Floor – Mail Room, New York, NY 10007, or via email to fema-r2pa-appeals@fema.dhs.gov. For reference, a current index of documents relevant to this determination is included in the enclosed Determination Memo.

Should you have any questions, please contact FEMA Public Assistance Correspondence Unit at fema-pr-pacorrespondence@fema.dhs.gov.

Sincerely,

José G. Baquero
Federal Disaster Recovery Coordinator
Joint Recovery Office Director of Puerto Rico
FEMA-4339-PR-DR/FEMA-4473-PR-DR

Enclosure:
FEMA PA Eligibility Determination Memorandum

ELIGIBILITY DETERMINATION MEMORANDUM
PR ELECTRIC POWER AUTHORITY, PA ID 000-UA2QU-00
FEMA-4339-DR-PR
May 25, 2021

Applicant Type		<input checked="" type="checkbox"/> State Agency <input type="checkbox"/> Local Government <input type="checkbox"/> Tribe <input type="checkbox"/> Private Nonprofit	
Grants Manager: <i>Only fill out this section if the project is in Grants Manager.</i>		EMMIE: <i>Only fill out this section if the project worksheet is in EMMIE.</i>	
Project No.	49797	EMMIE Project Worksheet No.	00251
Version No.		Version No.	2
Damage Inventory No.	141231	EMMIE Project Cost	\$945,429,800.00
		Total Amount Obligated	\$945,429,800.00
Project Title			
Project Size	<input checked="" type="checkbox"/> Large <input type="checkbox"/> Small (<i>Potentially subject to Net Small Project Overrun appeal</i>)	Category of Work:	B
Issue(s):			
Amount at Issue	\$944,727,478.95 ¹	Eligibility Issue Type(s)	<input type="checkbox"/> Applicant Eligibility <input type="checkbox"/> Facility Eligibility <input checked="" type="checkbox"/> Work Eligibility <input checked="" type="checkbox"/> Cost Eligibility
Amount Denied	\$46,024,883.00 ²		
Issue Keyword(s)	Supporting Documentation; Allowable Costs		

Project Description:

Hurricane Maria produced heavy rain, strong winds, flooding, and mudslides, which caused extensive damage throughout the Commonwealth of Puerto Rico between September 17, 2017 and November 15, 2017. On September 20, 2017, the President issued a major disaster declaration (FEMA-4339-DR-PR). This major disaster declaration, as subsequently amended, authorized Public Assistance (PA) for all 78 of Puerto Rico's municipalities. The Puerto Rico Electric Power Authority (PREPA; Subrecipient), a public corporation of the Government of Puerto Rico, is the sole provider of electricity in Puerto Rico.

To perform emergency repairs and restore power to the island, PREPA entered into Memoranda of Understanding with multiple investor-owned and municipality-owned utility companies, as well as commercial contracts.

¹ This is the aggregate amount of costs claimed by PREPA under PW 251.

² Aggregate amount of PREPA's claimed costs determined by FEMA to be ineligible. However, because PW 251 was obligated in the amount of \$945,429,800, total amount of funding to be deobligated pursuant to this Eligibility Determination Memo equals \$46,727,204.05.

On October 19, 2017, PREPA entered into an Emergency Master Service Agreement for PREPA's Electrical Grid Repairs – Hurricane Maria (Original Contract) with Cobra Acquisitions, LLC (Contractor; Cobra). The Original Contract was subsequently modified by Amendment No. 1, Amendment No. 2, Amendment No. 3, Amendment No. 4, and Amendment No. 5. The Original Contract, as amended, is referred to herein as the "Contract." The Contract was awarded on a time-and-materials (T&M) basis – meaning that PREPA would pay Cobra based upon hours worked, multiplied by the hourly rates for the work, plus the cost of any necessary materials. The Contract had an initial not-to-exceed ceiling of \$200 million, which was subsequently increased to \$945,429,800 in Amendment No. 5.

FEMA prepared Project Worksheet (PW) 251 for the emergency repair work performed by Cobra on PREPA's transmission and distribution lines. FEMA obligated PW 251 Version 0 on December 29, 2017 in the amount of \$200 million and obligated PW 251 Version 1 on March 8, 2018 in the amount of \$745,429,800. PREPA's claim for the work performed by Cobra pursuant to the Contract between October 19, 2017 and July 20, 2018 totaled \$944,727,478.95.

Issue:

Are costs claimed by PREPA in the amount of \$46,024,883.00 eligible for PA funding?

Applicable Statutes, Regulations, and Policies in Effect as of the Declaration of the Emergency or Disaster:

- Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Stafford Act), 42 U.S.C. § 5121 et seq (2019):
Stafford Act § 403(a)
- Title 44 of the Code of Federal Regulations (C.F.R.) (2017):
N/A
- FEMA Policy:
Public Assistance Program and Policy Guide, FP 104-009-2, at 9, 19 (Apr. 2018)
- Other Applicable Statutes and Regulations:
2 C.F.R. §§ 200.403(a) and (g)

Analysis:

Section 403 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act ("Stafford Act") authorizes FEMA, in relevant part, to make contributions to State and local governments and certain private nonprofit organizations for performing work or services essential to meeting

immediate threats to life, public health and safety, and improved property resulting from a major disaster. FEMA categorizes work and services of this nature as “emergency protective measures.”³

The four basic components of eligibility for PA funding are: (1) applicant, (2) facility, (3), work, and (4) cost.⁴ The applicant is responsible for providing documentation to support that each component is eligible.⁵

For costs to be eligible, an applicant must demonstrate that the costs are directly tied to the performance of eligible work, adequately documented, and necessary and reasonable to accomplish the work properly and efficiently.⁶ When work is performed under a contract, FEMA provides PA funding based on the terms of a contract provided that the contract complies with applicable federal procurement and contracting requirements.⁷

For purposes of this Eligibility Determination Memorandum (DM), neither PREPA’s compliance with federal procurement and contracting requirements nor the reasonableness of the rates Cobra charged to PREPA are at issue. Instead, this Determination Memo is based on whether the claimed costs at issue were authorized under the Contract pursuant to which they were incurred or can be directly tied to the performance of eligible work.

Per Section 51.1 of the Contract, payment for labor was to be based on the minimum daily rate prescribed in the schedule of rates set forth on Exhibit B (Contractor’s Rate Schedule), and as set forth in the Contractor’s Rate Schedule, Cobra’s billable daily rate was a blended rate of \$4,000 for 250 skilled linemen and equipment. For the period of time beginning on October 25, 2017 and ending on November 11, 2017, Cobra billed PREPA the daily minimum rate of \$1,563,000. This daily rate consists of \$1 million for labor (\$4,000 x 250), plus a rate of \$155,000 for a “550 Man Camp,” plus a rate of \$408,000 for management, security, and logistics staff. Per Section 4.3 of the Contract, “payment will be made for actual days worked.”

FEMA reviewed invoices associated with the costs claimed by PREPA for the Contract for the period of time beginning on October 25, 2017 and ending on November 11, 2017, which included transportation of personnel, equipment, miscellaneous items associated with mobilization, and the average daily rate for personnel. FEMA also reviewed documentation supporting costs claimed by PREPA under PW 358 for the transportation of personnel and equipment to Puerto Rico through a third-party vendor, Black 29 d/b/a Expeditionary Global Logistics, LLC (XGL).

Based on FEMA’s review of this documentation, Cobra did not have the minimum number of linemen (in other words, 250) on which the daily rate was based in Puerto Rico until November 12, 2017. Therefore, all of the costs claimed by PREPA for 250 “skilled linemen and

³ *Public Assistance Program and Policy Guide*, FP 104-009-2, at 19 (Apr. 2018) (PAPPG).

⁴ *Id.*, at 9.

⁵ *Id.*

⁶ *Id.*, at 21-22. 2 C.F.R. §§ 200.403(a) and (g).

⁷ *PAPPG*, at 30.

equipment” prior to November 12, 2017, cannot be directly tied to the performance of eligible work. Moreover, the costs are not authorized by the Contract. Accordingly, costs claimed by PREPA per Section 51.1 of the Contract for “skilled linemen” that were not then in Puerto Rico and did not therefore perform eligible work over this approximately 17-day period of time are not eligible. FEMA’s calculation of the costs determined to be ineligible are shown in Attachment A.

Additionally, various mobilization expenses were claimed under an invoice titled “Invoice 4” dated October 26, 2017. This invoice includes supporting documentation consisting of a group of miscellaneous receipts, which included \$133,800 in monthly rent costs for apartments. Based on the Contractor’s Rate Schedule, costs for an all-inclusive for a “550 Man Camp” were billed to PREPA. The billing of additional lodging costs is not supported by the terms of the Contract, which resulted in duplicative costs that were already billed to, and paid by, PREPA. Therefore, claimed costs for lodging included in Invoice 4 are not eligible for PA funding.

Lastly, on February 27, 2018, PREPA and Cobra signed Amendment No. 5 to the Original Contract, which in Section 11 states that Cobra could “neither increase nor decrease its total staffing resources by more than 10 percent from the level agreed to in Exhibit 1-B Contractors’ Rate Schedule of 882 personnel without the written consent of PREPA.” Based on this information, the lowest allowable count is 794 and the highest allowable count is 970. Based on information submitted by PREPA, FEMA identified 43 days that Cobra exceeded the highest allowable man count per day. Although requested by FEMA on several occasions, PREPA did not provide documentation of its written approval for an increase in Cobra’s allowable maximum personnel count. Therefore, the costs claimed for excess staff (\$24,439,810.49) are not eligible as shown in Attachment B.”

Eligibility Determination: Partially Approved Denied

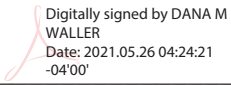
As set forth above, FEMA has determined that costs in the aggregate amount of \$46,024,883.00 are not supported by the terms of its Contract with Cobra and/or cannot be tied to the performance of eligible work. Therefore, these costs are not eligible for PA funding. As a result, the balance of the Cobra Contract costs claimed by PREPA in the aggregate amount of \$898,702,595.95 are eligible. Because obligated funding totals \$945,429,800, FEMA will deobligate \$46,727,204.05.

It should be noted that the eligible costs in the amount of \$898,702,595.95 include \$76,717,644.43 in claimed costs associated with an estimated tax obligation of Cobra to the Government of Puerto Rico. Under the terms of the Contract – specifically, the Contractor’s Rate Schedule, the amount that PREPA is required to reimburse Cobra includes the actual amount of taxes (including withholding) paid by Cobra to the Government of Puerto Rico in excess of 8.5% so that Cobra receives the same amount that it would have received under the Contract if it had been exempt from such taxes. At closeout, PREPA must provide to FEMA documentation demonstrating the actual amount of taxes it paid to the Government of Puerto Rico in excess of said 8.5% threshold. Based on FEMA’s validation of the documentation

submitted in support of these costs and eligibility of the claimed costs, FEMA will adjust the total eligible amount of funding accordingly. FEMA will at that time deduct the amount of the taxes included in the actual amount of taxes paid that are associated with the ineligible work/costs addressed in this DM. In this regard, FEMA notes that taxes associated with ineligible work and/or costs are also ineligible for PA funding.

Preparation and Review:

Preparer: Dana Waller, PA Program Analyst

Signature: DANA M WALLER  Digitally signed by DANA M WALLER
 Date: 2021.05.26 04:24:21 -04'00' Date: _____

Office of Chief Counsel Reviewer: Katerina Huertas Ocasio

Signature: KATERINA M HUERTAS-OCASIO  Digitally signed by KATERINA M HUERTAS-OCASIO
 Date: 2021.05.26 08:45:01 -04'00' Date: _____

Approval:

PA Management: Danna Planas Ocasio, Infrastructure Division Director

Signature: DANNA E PLANAS OCASIO  Digitally signed by DANNA E PLANAS OCASIO
 Date: 2021.05.26 08:55:53 -04'00' Date: _____

Document Index:

Document Description	File Name
Original Contract	49797-DR4339-PW251-PREPA+MSA-Cobra+Complete.pdf
Contract Document – Amendment No. 1	49797-DR4339-PW251-Cobra+Energy-+amendment.pdf
Contract Document – Amendment No. 2	49797-DR4339-PW251-Amendment 2.pdf

Contract Document – Amendment No. 3	49797-DR4339-PW251-Amendment 3.pdf
Contract Document – Amendment No. 4	49797-DR4339-PW251-Amendment 4.pdf
Contract Document – Amendment No. 5	49797-DR4339-PW251-Amendment 5.pdf
Invoice 4	49797-DR4339-PW251-Invoice 4

Mobilized Staff (as per COBRA's Daily Update Report from 11/22/17 @1900hrs)									Recalculated costs					Comments
Date	Lineman	Lineman rate	Manager	Man/Log rate	Security	Security rate	Total count	Man Camp rate	Lineman	Man/Log	Security	Man Camp	Total	
10/25/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	Advance Team arrived 10/24/17 - 23
10/26/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
10/27/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
10/28/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
10/29/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
10/30/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
10/31/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
11/1/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
11/2/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
11/3/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
11/4/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
11/5/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
11/6/2017	12	\$ 4,000	23	\$ 2,500	20	\$ 2,000	55	\$ 281.82	\$ 48,000	\$ 57,500	\$ 40,000	\$ 15,500	\$ 161,000	
11/7/2017	25	\$ 4,000	23	\$ 2,500	34	\$ 2,000	82	\$ 281.82	\$ 100,000	\$ 57,500	\$ 68,000	\$23,109.09	\$ 248,609.09	Push 1 Team arrived 11/7/17 - 52 Lineman and 14 Security//39 lineman
11/8/2017	25	\$ 4,000	23	\$ 2,500	34	\$ 2,000	82	\$ 281.82	\$ 100,000	\$ 57,500	\$ 68,000	\$23,109.09	\$ 248,609.09	39 lineman working on TL50700
11/9/2017	145	\$ 4,000	23	\$ 2,500.00	39	\$ 2,000.00	207	\$ 281.82	\$ 580,000.00	\$ 57,500.00	\$78,000.00	\$58,336.36	\$ 773,836.36	Push 2 Team arrived 11/9/17 - 129 Lineman and 5 Security//48 lineman
11/10/2017	146	\$ 4,000	23	\$ 2,500.00	39	\$ 2,000.00	208	\$ 281.82	\$ 584,000.00	\$ 57,500.00	\$78,000.00	\$58,618.18	\$ 778,118.18	47 lineman working on TL50700
11/11/2017	198	\$ 4,000	23	\$ 2,500.00	39	\$ 2,000.00	260	\$ 281.82	\$ 792,000.00	\$ 57,500.00	\$78,000.00	\$73,272.73	\$ 1,000,772.73	Push 3 Team arrived 11/11/17 - 117 Lineman//112 lineman working on
GRAND TOTA \$ 5,142,945.45														

Man Camp rate calculation:

550 Staff Man Camp \$155,000.00
Per Staff cost \$ 281.82

Summary of dates exceeding allowed man count

Date	Transmission count	Distribution count	Security count	Logistic count	Management count	Total overall count	Man Camp cost	Average Rate per lineman for this date	Max. overall count (Amd #5)	Excess count	Man count Credit
4/11/2018	318	443	138	50	30	979	\$ 249,938.91	\$ 4,335.74	970	9	\$ 39,021.66
4/12/2018	321	434	138	50	30	973	\$ 248,383.27	\$ 4,340.32	970	3	\$ 13,020.95
4/16/2018	304	448	138	50	32	972	\$ 248,124.00	\$ 4,348.75	970	2	\$ 8,697.50
4/17/2018	314	452	138	50	32	986	\$ 251,753.82	\$ 4,337.99	970	16	\$ 69,407.83
4/18/2018	314	448	138	50	32	982	\$ 250,716.73	\$ 4,341.02	970	12	\$ 52,092.28
4/19/2018	325	439	138	50	30	982	\$ 251,494.55	\$ 4,333.48	970	12	\$ 52,001.75
6/5/2018	237	658	138	54	34	1121	\$ 290,644.73	\$ 4,270.11	970	151	\$ 644,786.20
6/6/2018	246	673	138	52	34	1143	\$ 296,348.73	\$ 4,251.78	970	173	\$ 735,557.60
6/7/2018	254	669	138	51	33	1145	\$ 296,867.27	\$ 4,244.66	970	175	\$ 742,815.66
6/8/2018	251	711	138	51	30	1181	\$ 306,201.09	\$ 4,217.84	970	211	\$ 889,963.56
6/9/2018	254	711	138	51	30	1184	\$ 306,719.64	\$ 4,216.41	970	214	\$ 902,312.48
6/10/2018	254	709	138	50	30	1181	\$ 305,164.00	\$ 4,214.97	970	211	\$ 889,359.08
6/11/2018	252	658	138	50	31	1129	\$ 292,718.91	\$ 4,244.00	970	159	\$ 674,795.83
6/12/2018	248	684	138	50	31	1151	\$ 298,422.91	\$ 4,232.57	970	181	\$ 766,095.90
6/13/2018	250	685	138	50	32	1155	\$ 299,460.00	\$ 4,233.52	970	185	\$ 783,200.96
6/14/2018	250	673	138	51	32	1144	\$ 296,608.00	\$ 4,242.17	970	174	\$ 738,137.22
6/15/2018	260	664	138	50	30	1142	\$ 296,089.45	\$ 4,234.18	970	172	\$ 728,278.16
6/16/2018	258	663	138	50	30	1139	\$ 294,274.55	\$ 4,235.72	970	169	\$ 715,836.66
6/17/2018	258	658	138	51	30	1135	\$ 293,237.45	\$ 4,240.83	970	165	\$ 699,736.72
6/18/2018	258	618	138	53	32	1099	\$ 284,940.73	\$ 4,273.29	970	129	\$ 551,254.55
6/19/2018	253	642	138	53	32	1118	\$ 289,866.91	\$ 4,262.39	970	148	\$ 630,834.37
6/20/2018	237	653	138	53	32	1113	\$ 288,570.55	\$ 4,265.22	970	143	\$ 609,926.01
6/21/2018	233	653	138	53	30	1107	\$ 286,237.09	\$ 4,262.30	970	137	\$ 583,935.59
6/22/2018	232	655	138	53	30	1108	\$ 286,237.09	\$ 4,261.74	970	138	\$ 588,119.75
6/23/2018	231	650	138	52	30	1101	\$ 285,459.27	\$ 4,262.54	970	131	\$ 558,393.08

6/24/2018	233	662	138	51	30	1114	\$ 288,829.82	\$ 4,252.11	970	144	\$ 612,303.93
6/25/2018	226	648	138	54	32	1098	\$ 284,681.45	\$ 4,277.10	970	128	\$ 547,468.59
6/26/2018	228	686	138	55	30	1137	\$ 294,793.09	\$ 4,251.95	970	167	\$ 710,075.78
6/27/2018	227	687	138	55	30	1137	\$ 294,274.55	\$ 4,251.95	970	167	\$ 710,075.78
6/28/2018	224	685	138	55	30	1132	\$ 293,237.45	\$ 4,254.66	970	162	\$ 689,254.40
6/29/2018	225	679	138	54	32	1128	\$ 292,459.64	\$ 4,259.94	970	158	\$ 673,070.21
6/30/2018	232	675	138	53	30	1128	\$ 292,459.64	\$ 4,250.67	970	158	\$ 671,606.44
7/1/2018	233	674	138	53	31	1129	\$ 292,718.91	\$ 4,253.21	970	159	\$ 676,260.48
7/2/2018	217	661	138	53	32	1101	\$ 285,459.27	\$ 4,272.12	970	131	\$ 559,647.96
7/3/2018	221	669	138	54	32	1114	\$ 288,829.82	\$ 4,267.80	970	144	\$ 614,563.52
7/4/2018	244	651	138	54	30	1117	\$ 144,544.55	\$ 2,130.04	970	147	\$ 313,115.26
7/5/2018	246	644	138	53	35	1116	\$ 289,348.36	\$ 4,272.97	970	146	\$ 623,854.06
7/6/2018	226	656	138	54	35	1109	\$ 287,533.45	\$ 4,280.23	970	139	\$ 594,952.62
7/7/2018	246	633	138	54	31	1102	\$ 285,718.55	\$ 4,271.54	970	132	\$ 563,843.18
7/8/2018	245	626	138	54	30	1093	\$ 283,385.09	\$ 4,273.60	970	123	\$ 525,652.29
7/10/2018	250	622	138	56	35	1101	\$ 285,459.27	\$ 4,291.48	970	131	\$ 562,183.65
7/11/2018	237	643	138	56	35	1109	\$ 287,533.45	\$ 4,286.65	970	139	\$ 595,843.88
7/12/2018	233	631	138	56	35	1093	\$ 283,385.09	\$ 4,296.40	970	123	\$ 528,457.11

\$24,439,810.49