

United States Department of the Interior

BUREAU OF RECLAMATION Washington, D.C. 20240

D-7400 ADM-1.00

MEMORANDUM

To:

Office of the Inspector General

Attention: Assistant Inspector General for Audits

Through: R. Thomas Weimer R Thomas Weimer

NOV 23 2304

Principal Deputy Assistant Secretary - Water and Science

From:

John W. Keys, III Clear Gent Commissioner

Subject:

Response to the Draft Independent Auditors' Report on the

Bureau of Reclamation's Financial Statements for Fiscal Years 2004 and 2003

(Assignment No. C-IN-BOR-0063-2004)

We appreciate the opportunity to review and comment on the draft audit report titled Independent Auditors' Report on the Bureau of Reclamation's Financial Statements for Fiscal Years 2004 and 2003. Enclosed for your consideration is Reclamation's response to the recommendations as stated in the draft audit report.

Generally, we concur with the findings and recommendations on the controls over land inventory. We have provided information on planned corrective actions for these findings. However, Reclamation does not concur with recommendation A.2. to include a material land inventory internal control weakness in our Federal Managers' Financial Integrity Act (FMFIA) report. Furthermore, Reclamation does not concur that its financial management systems do not substantially comply with Federal accounting standards as required by the Federal Financial Management Improvement Act (FFMIA). Reclamation asserts that its financial management systems are substantially in compliance with accounting standards. Specifically, Reclamation meets the FFMIA compliance requirement as provided in the Office of Management and Budget (OMB) Memorandum, "Revised Implementation Guidance for the Federal Financial Management Improvement Act," dated January 4, 2001. For example, Reclamation prepares financial statements in compliance with Form and Content of Agency Financial Statements, OMB Bulletin No. 01-09, and Reclamation's financial information produced for internal management is accurate and consistent with Federal accounting standards. Reclamation does not agree that the land inventory material weakness has significantly affected our ability to prepare financial statements and related disclosures that are consistent with Federal accounting standards, budget reports, or other financial information for management decision making purposes. Taken as a whole, Reclamation's financial management systems provide financial information which is complete, accurate, reliable, and consistent, in accordance with Federal accounting standards.

Additionally, Reclamation concurs with the finding on the controls over revenue recognition, accuracy and completeness, and related recommendation B.1. However, Reclamation does not concur with the finding on controls over revenue recognition, classification of facility transfers, and related recommendation B.2. to change the accounting treatment of such. Reclamation's current accounting treatment of transferred facilities is in accordance with generally accepted accounting principles, including those specified in the Statement of Federal Financial Accounting Standards (SFFAS) No. 6 "Accounting for Property, Plant, and Equipment," and SFFAS No. 8 "Supplementary Stewardship Reporting."

If you have any questions or require additional information, please contact Reclamation's Audit Liaison Officer, Tom Lab, at 303-445-3436.

Attachments (2)

cc: Assistant Secretary - Water and Science Attention: Olivia Ferriter (w/copy of incoming and att)

Bureau of Reclamation KPMG, LLP Draft Audit Report Response to Draft Audit Report Recommendations November 2004

A. Controls Over Land Inventory

Recommendation A.1

Continue to complete the reconciliation of the financial accounting system support for land and land rights costs with the subsidiary records, including individual project plat book maps, which contain data from individual land purchase contracts.

Response

Concur. Reclamation will continue the reconciliation of the financial accounting system support for land and land rights with subsidiary records, including individual project plat book maps in accordance with the 5-year corrective action plan.

The responsible official is the Director, Operations. The target date for completing the reconciliation is September 30, 2005.

Recommendation A.2

Continue to include a material land inventory system internal control weakness in Reclamation's Federal Managers' Financial Integrity Act (FMFIA) report to the Department of the Interior until resolved.

Response

Non-Concur. As of September 30, 2004, Reclamation had reconciled 93 percent of projects and 98 percent of land costs in the Foundation Information for Real Property Management System (FIRM) to the Federal Financial System (FFS). In Reclamation's opinion, the progress we have made on the reconciliation, the minimal outstanding balances to be reconciled, and the control weaknesses identified do not meet the definition of an FMFIA material weakness for reporting in Reclamation's Fiscal Year 2005 Annual Assurance Statement on Management Controls.

Recommendation A.3

Properly implement existing policies and procedures to ensure land deletions are recorded properly in Reclamation's financial accounting system. This includes improved coordination between Reclamation's realty office and finance.

Response

Concur. Reclamation will properly implement existing policies and procedures to ensure all current year land deletions are properly recorded. Reclamation will ensure that established coordination processes between its realty and finance offices are followed.

The responsible officials are the Director, Operations and Director, Management Services. Quality control and oversight will be performed throughout the year to ensure full implementation by September 30, 2005.

B. Controls Over Revenue Recognition

Recommendation B.1

Establish and implement sufficient internal controls, including regional quality control reviews and management oversight, to ensure that the revenue recognition entries are complete and accurate.

Response

Concur. Reclamation will establish and implement controls, including regional quality control reviews and management oversight, to ensure that revenue recognition entries are complete and accurate.

The responsible officials are the Director, Operations and the Director, Management Services. Quality control and oversight will be performed throughout the year to ensure full implementation by September 30, 2005.

Recommendation B.2

Establish and implement controls, including policies and procedures, to ensure transfers of facilities are properly accounted for in accordance with accounting principles generally accepted in the United States of America.

Response

Non-concur. Reclamation's procedures for transferring facilities are in accordance with applicable generally accepted accounting principles. Reclamation's facilities are originally constructed under Reclamation Law, under which Reclamation retains title to the facilities. Subsequent transfer of facilities does not cause these facilities to meet the criteria for non-Federal physical property. As specified in Statement of Federal Financial Accounting Standards (SFFAS) No. 8, "Supplementary Stewardship Reporting," investment in non-Federal physical property results from "expenses incurred by the Federal Government for the purchase, the construction, or the major renovation of physical property owned by state and local governments" (italics added). Reclamation

did not originally construct the transferred facilities with the intent that a state or local government would own these facilities. Legislation to transfer these facilities was subsequently enacted.

After legislation is passed to transfer facilities to another entity, Reclamation transfers these facilities in accordance with generally accepted accounting principles. SFFAS No. 6, "Accounting for Property, Plant, and Equipment" (PP&E), paragraph 38, specifies the following treatment: "In the period of disposal, retirement, or removal from service, general PP&E shall be removed from the asset accounts along with associated accumulated depreciation/amortization. Any difference between the book value of the PP&E and amounts realized shall be recognized as a gain or loss in the period that the general PP&E is disposed of, retired, or removed from service." Reclamation currently follows this requirement.

Compliance with the Federal Financial Management Improvement Act of 1996 (FFMIA)

Reclamation does not concur that its financial management systems do not substantially comply with Federal accounting standards as required by the FFMIA. Reclamation asserts that its financial management systems are substantially in compliance with accounting standards. Specifically, Reclamation meets the FFMIA compliance requirement as provided in the Office of Management and Budget (OMB) Memorandum, "Revised Implementation Guidance for the Federal Financial Management Improvement Act," dated January 4, 2001. For example, Reclamation prepares financial statements in compliance with Form and Content of Agency Financial Statements, OMB Bulletin No. 01-09, and Reclamation's financial information produced for internal management is accurate and consistent with Federal accounting standards.

The OMB FFMIA Implementation Guidance recognizes three indicators of compliance with accounting standards: (1) receiving an unqualified opinion, which Reclamation has received; (2) producing managerial cost information consistent with SFFAS No. 4, "Managerial Cost Accounting Concepts and Standards," which Reclamation has achieved; and (3) receiving an internal control audit report that disclosed no material weaknesses in internal controls that affect the agency's ability to prepare financial statements and related disclosures that are consistent with Federal accounting standards, budget reports, or other financial information for management decision making purposes. KPMG's finding focuses primarily on Reclamation's land and land rights material internal control weakness as its basis for determination of noncompliance with accounting standards. Reclamation has taken corrective action in accordance with a 5-year corrective action plan and has reconciled 93 percent of projects and 98 percent of land costs in FIRM to FFS. Reclamation does not agree that the land inventory material weakness has significantly affected our ability to prepare financial statements and related disclosures that are consistent with Federal accounting standards, budget reports, or other financial information for management decision making purposes. Taken as a whole, Reclamation's financial management systems provide financial information which is complete, accurate, reliable, and consistent, in accordance with Federal accounting standards.

Financial Section

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U.S. Department of the Interior Bureau of Reclamation Consolidated Balance Sheet As of September 30, 2004, and 2003

(In Thousands)	2004			
ASSETS (Note 2)				
Intragovernmental Assets:				
Fund Balance with Treasury (Note 3)	\$	5,233,607	\$	4,719,708
Accounts and Interest Receivable, Net (Note 4)		351,765		211,218
Advances and Prepayments		1,236		1,759
Total Intragovernmental Assets		5,586,608		4,932,685
Cash		91		107
Accounts and Interest Receivable, Net (Note 4)		32,179		18,212
Loans and Interest Receivable, Net (Note 5)		166,900		166,621
General Property, Plant, and Equipment, Net (Note 6)		13,065,549		13,055,281
Other:				
Advances and Prepayments		21,612		11,666
Other Assets, Net (Note 7)		170,371		179,001
Total Assets	\$	19,043,310	\$	18,363,573
LIABILITIES (Note 8)				
Intragovernmental Liabilities:				
Accounts Payable	\$	25,712	\$	18,617
Debt (Note 9)	Ψ	114,098	Ψ	114,826
Other:		,000		,020
Accrued Payroll Benefits		21,100		19,643
Advances from Others		10,360		9,363
Deferred Revenue		21		34
Judgment Fund Liability		46,959		48,798
Other Liabilities		21,028		22,204
Total Intragovernmental Liabilities		239,278		233,485
Accounts Payable		196,000		220,987
Federal Employees Compensation Act Liability		85,815		93,468
Environmental Cleanup Costs (Note 10)		5,629		5,804
Other:				
Accrued Payroll and Benefits		44,818		40,828
Advances from Others		91,240		110,114
Deferred Revenue		180,060		176,051
Contingent Liabilities (Note 10)		62,625		69,100
Other Liabilities		115		115
Total Liabilities		905,580		949,952
NET POSITION				
Unexpended Appropriations		325,934		314,643
Cumulative Results of Operations		17,811,796		17,098,978
Total Net Position		18,137,730		17,413,621
Total Liabilities and Net Position	\$	19,043,310	\$	18,363,573

U.S. Department of the Interior Bureau of Reclamation Consolidated Statement of Net Cost For the Year Ended September 30, 2004

RESOURCE USE	
Deliver Water in an Environmentally Responsible and Cost Efficient Manner:	
Segment Expenses for Services Provided to the Public	\$ 1,076,772
Segment Exchange Revenues from the Public	(446,484
Segment Cost of Operations for Services Provided to the Public	630,288
Segment Expenses for Services Provided to Other Federal Entities	51,632
Segment Exchange Revenues from Other Federal Entities	(50,575
Segment Cost of Operations for Services Provided to Other Federal Entities	1,057
Net Segment Cost of Operations	631,345
Generate Hydropower in an Environmentally Responsible and Cost Efficient Manner:	
Segment Expenses for Services Provided to the Public	125,338
Segment Exchange Revenues from the Public	(182,662
Segment Cost of Operations for Services Provided to the Public	(57,324
Segment Expenses for Services Provided to Other Federal Entities	87,523
Segment Exchange Revenues from Other Federal Entities	(84,481)
Segment Cost of Operations for Services Provided to Other Federal Entities	3,042
Net Segment Cost of Operations	(54,282
·	(0.1,202
RESOURCE PROTECTION	
Improve Health of Watersheds, Landscapes, and Biological Communities:	16 100
Segment Expenses for Services Provided to the Public	16,123 209
Segment Exchange Revenues from the Public Segment Cost of Operations for Services Provided to the Public	16,332
Segment Expenses for Services Provided to Other Federal Entities	349
Segment Exchange Revenues from Other Federal Entities	(18
Segment Cost of Operations for Services Provided to Other Federal Entities	331
Net Segment Cost of Operations	16,663
	-,
RECREATION Provide Quality and Fair Value in Degreetien:	
Provide Quality and Fair Value in Recreation:	22,270
Segment Expenses for Services Provided to the Public Segment Exchange Revenues from the Public	(24,215
Segment Cost of Operations for Services Provided to the Public	(1,945
Segment Expenses for Services Provided to Other Federal Entities	270
Segment Exchange Revenues from Other Federal Entities	(264
Segment Cost of Operations for Services Provided to Other Federal Entities	6
Net Segment Cost of Operations	(1,939
	(1,000)
CENTRALIZED PROGRAM SUPPORT AND OTHER	
Working Capital Fund, Policy and Administration, and Other:	100 001
Segment Expenses for Services Provided to the Public	120,801
Segment Exchange Revenues from the Public	(56,128
Segment Cost of Operations for Services Provided to the Public	64,673
Segment Expenses for Services Provided to Other Federal Entities	40,050
Segment Exchange Revenues from Other Federal Entities	(40,050
Segment Cost of Operations for Services Provided to Other Federal Entities Net Segment Cost of Operations	64,673
·	
Total Expenses for Services Provided to the Public	1,361,304
Total Exchange Revenues from the Public	(709,280
Total Net Cost of Operations for Services Provided to the Public	652,024
Total Expenses for Services Provided to Other Federal Entities	179,824
Total Exchange Revenues from Other Federal Entities Total Net Cost of Operations for Services Provided to Other Federal Entities	(175,388)
Total Net Cost of Operations for Services Provided to Other Federal Entities Total Net Cost of Operations (Note 12)	\$ 656,460
Total Total Of Operations (Total 12)	Ψ 050,400

U.S. Department of the Interior Bureau of Reclamation Consolidated Statement of Net Cost For the Year Ended September 30, 2003

(In Thousands)		
WATER AND ENERGY MANAGEMENT AND DEVELOPMENT		
Segment Expenses for Services Provided to the Public	\$	492,398
Segment Exchange Revenues from the Public		(279,663
Segment Cost of Operations for Services Provided to the Public		212,735
Segment Expenses for Services Provided to Other Federal Entities		66,130
Segment Exchange Revenues from Other Federal Entities		(65,414)
Segment Cost of Operations for Services Provided to Other Federal Entities		716
Net Segment Cost of Operations		213,451
FACILITIES OPERATIONS		
Segment Expenses for Services Provided to the Public		550,300
Segment Exchange Revenues from the Public Segment Cost of Operations for Services Provided to the Public		(249,791)
Segment Expenses for Services Provided to Other Federal Entities		54,540
Segment Exchange Revenues from Other Federal Entities		(53,333)
Segment Cost of Operations for Services Provided to Other Federal Entities		1,207
Net Segment Cost of Operations		301,716
FACILITIES MAINTENANCE AND REHABILITATION		
Segment Expenses for Services Provided to the Public		99,154
Segment Exchange Revenues from the Public		(12,581)
Segment Cost of Operations for Services Provided to the Public		86,573
Segment Expenses for Services Provided to Other Federal Entities		2
Segment Exchange Revenues from Other Federal Entities		(2)
Segment Cost of Operations for Services Provided to Other Federal Entities Net Segment Cost of Operations		86,573
·		00,573
FISH AND WILDLIFE MANAGEMENT AND DEVELOPMENT Segment Expenses for Services Provided to the Public		137,350
Segment Exchange Revenues from the Public		(47,881)
Segment Cost of Operations for Services Provided to the Public		89,469
Segment Expenses for Services Provided to Other Federal Entities		16,567
Segment Exchange Revenues from Other Federal Entities		(16,397)
Segment Cost of Operations for Services Provided to Other Federal Entities		170
Net Segment Cost of Operations		89,639
LAND MANAGEMENT AND DEVELOPMENT		
Segment Expenses for Services Provided to the Public		33,365
Segment Exchange Revenues from the Public		(2,876)
Segment Cost of Operations for Services Provided to the Public		30,489
Segment Expenses for Services Provided to Other Federal Entities		2
Segment Exchange Revenues from Other Federal Entities		-
Segment Cost of Operations for Services Provided to Other Federal Entities Net Segment Cost of Operations		30,491
POLICY AND ADMINISTRATION		,
Segment Expenses for Services Provided to the Public		65,926
Segment Exchange Revenues from the Public		-
Segment Cost of Operations for Services Provided to the Public		65,926
Segment Expenses for Services Provided to Other Federal Entities		-
Segment Exchange Revenues from Other Federal Entities		-
Segment Cost of Operations for Services Provided to Other Federal Entities		-
Net Segment Cost of Operations		65,926
CENTRALIZED PROGRAM SUPPORT		
Segment Expenses for Services Provided to the Public		26,752
Segment Exchange Revenues from the Public		(28,132)
Segment Cost of Operations for Services Provided to the Public		(1,380)
Segment Expenses for Services Provided to Other Federal Entities		43,534
Segment Exchange Revenues from Other Federal Entities		(33,063)
Segment Cost of Operations for Services Provided to Other Federal Entities Net Segment Cost of Operations		10,471 9,091
Total Expenses for Services Provided to the Public	-	1,405,245
Total Expenses for Services Frowthee to the Fublic Total Exchange Revenues from the Public		(620,924)
Total Net Cost of Operations for Services Provided to the Public		784,321
Total Expenses for Services Provided to Other Federal Entities		180,775
Total Exchange Revenues from Other Federal Entities	_	(168,209)
Total Net Cost of Operations for Services Provided to Other Federal Entities		12,566
Total Net Cost of Operations (Note 12)	\$	796,887

U.S. Department of the Interior
Bureau of Reclamation
Consolidated Statement of Changes in Net Position
For the Years Ended September 30, 2004, and 2003

(In Thousands)	2004	2003
UNEXPENDED APPROPRIATIONS		
Beginning Balance	\$ 314,643	\$ 338,509
Budgetary Financing Sources:		
Appropriations Received, General Funds	168,998	151,924
Appropriations Transferred In/Out	38,141	39,305
Appropriations Used	(195,353)	(215,095)
Other Adjustments	 (495)	
Total Budgetary Financing Sources	 11,291	(23,866)
Ending Balance - Unexpended Appropriations	\$ 325,934	\$ 314,643
CUMULATIVE RESULTS OF OPERATIONS		
Beginning Balance	\$ 17,098,978	\$ 16,743,925
Budgetary Financing Sources:		
Appropriations Used	195,353	215,095
Royalties and Other Revenue Transfers	1,066,779	641,244
Budgetary Transfers In/Out Without Reimbursement	(5,449)	103,215
Donations and Other Non-exchange Revenue	149	188
Other Financing Sources:		
Imputed Financing from Costs Absorbed by Others	137,554	244,807
Other Transfers In/Out Without Reimbursement	(25,181)	(52,665)
Donations of Property	73	56
Total Financing Sources	1,369,278	1,151,940
Net Cost of Operations	 (656,460)	(796,887)
Ending Balance - Cumulative Results of Operations	\$ 17,811,796	\$ 17,098,978

U.S. Department of the Interior
Bureau of Reclamation
Combined Statement of Budgetary Resources
For the Years Ended September 30, 2004, and 2003

		Budgetary			Non-Budgetary Credit Program Financing Account			
(In Thousands)		2004		2003		2004		2003
BUDGETARY RESOURCES								
Budget Authority:								
Appropriations Received	\$	1,020,602	\$	1,008,690	\$	-	\$	-
Borrowing Authority		-		-		4,125		18,906
Net Transfers, Current Year Authority		4,664		5,903		-		-
Unobligated Balance:								
Beginning of Fiscal Year		558,743		516,990		-		7
Net Transfers, Unobligated Balance, Actual		1,346		498		-		-
Spending Authority from Offsetting Collections:								
Earned:								
Collected		795,718		729,638		8,011		(8,838)
Receivable from Federal Sources		14,795		(16,580)		_		-
Change in Unfilled Customer Orders:				, ,				
Advance Received		3,854		25,319		_		_
Without Advance from Federal Sources		1,493		(9,869)		_		_
Recoveries of Prior Year Obligations		41,478		35,982		26		137
Permanently Not Available		(16,659)		(32,451)		(4,853)		(713)
Total Budgetary Resources	\$	2,426,034		2,264,120	\$	7,309	\$	9,499
STATUS OF BUDGETARY RESOURCES								
Obligations Incurred:								
Direct	\$	990,891	\$	978,171	Φ.	7,309	\$	9,499
Reimbursable	Ψ	832,902	Ψ	727,206	Ψ	7,509	Ψ	3,433
Total Obligations Incurred		1,823,793		1,705,377		7,309		9,499
Unobligated Balance:		1,023,793		1,705,577		7,509		3,433
Apportioned		562,797		517,394		_		_
Exempt from Apportionment		39,444		41,349				
Total Status of Budgetary Resources	-\$	2,426,034	\$	2,264,120	\$	7,309	\$	9,499
		2,420,004	Ψ	2,204,120	Ψ	7,000	Ψ	0,400
RELATIONSHIP OF OBLIGATIONS TO OUTLAYS								
Obligations Incurred	\$	1,823,793	\$	1,705,377	\$	7,309	\$	9,499
Obligated Balance, Net, Beginning of Fiscal Year		627,386		618,276		8,051		8,941
Obligated Balance, Net, End of Fiscal Year:								
Accounts Receivable		37,330		22,534		-		-
Unfilled Customer Orders from Federal Sources		29,859		28,366		-		-
Undelivered Orders		(488,201)		(422,060)		(3,951)		(8,051)
Accounts Payable		(253,931)		(256,226)		-		-
Less: Spending Authority Adjustments		(57,766)		(9,533)		(26)		(137)
Outlays:								
Disbursements		1,718,470		1,686,734		11,383		10,252
Less: Offsetting Collections		(799,572)		(754,957)		(8,011)		8,838
Net Outlays Before Offsetting Receipts		918,898		931,777		3,372		19,090
Less: Offsetting Receipts		(1,460,188)		(1,385,565)				
Net Outlays (Receipts)	\$	(541,290)	\$	(453,788)	\$	3,372	\$	19,090

U.S. Department of the Interior Bureau of Reclamation Consolidated Statement of Financing For the Years Ended September 30, 2004, and 2003

(In Thousands)		2004	2003
RESOURCES USED TO FINANCE ACTIVITIES			
Budgetary Resources Obligated:			
Obligations Incurred	\$	1,831,102 \$	1,714,876
Less: Spending Authority from Offsetting Collections and Adjustments	•	(865,375)	(755,790)
Obligations Net of Offsetting Collections and Adjustments	-	965,727	959,086
Less: Offsetting Receipts		(1,460,188)	(1,385,565)
Net Obligations		(494,461)	(426,479)
Other Resources:		, ,	,
Donations of Property		73	56
Other Transfers In/Out Without Reimbursement		(25,181)	(52,665)
Imputed Financing from Costs Absorbed by Others		137,554	244,807
Net Other Resources Used to Finance Activities		112,446	192,198
Total Resources Used to Finance Activities		(382,015)	(234,281)
RESOURCES USED TO FINANCE ITEMS NOT PART OF THE			
NET COST OF OPERATIONS			
Change in Budgetary Resources Obligated for Goods, Services, and Benefits Ordered but Not Yet Provided		(69,485)	51,216
Resources That Fund Expenses Recognized in Prior Periods		13,787	(394)
Budgetary Offsetting Collections and Receipts That Do Not Affect Net Cost of Operations:			
Offsetting Receipts Not Part of the Net Cost of Operations		1,050,255	1,013,486
Resources That Finance the Acquisition of Assets		(261,540)	(258,030)
Other Resources or Adjustments to Net Obligated Resources That		, ,	, , ,
Do Not Affect Net Cost of Operations		36,451	32,578
Total Resources Used to Finance Items Not Part of the Net Cost of Operations		769,468	838,856
Total Resources Used to Finance the Net Cost of Operations		387,453	604,575
COMPONENTS OF THE NET COST OF OPERATIONS THAT WILL NOT			
REQUIRE OR GENERATE RESOURCES IN THE CURRENT PERIOD			
Components Requiring or Generating Resources in Future Periods:		(0.10)	222
Increase (Decrease) in Annual Leave Liability		(219)	888
Increase (Decrease) in Environmental Cleanup Cost Liability		(176)	363
Increase (Decrease) in Exchange Revenue Receivable from the Public		2,995	(5,880)
Increase (Decrease) in Other Unfunded Liabilities	-	(7,097)	(26,180)
Total Components of Net Cost of Operations That Will Require or Generate Resources in Future Periods		(4,497)	(30,809)
nesources in ruture renous		(4,437)	(50,009)
Components Not Requiring or Generating Resources:			
Depreciation and Amortization		185,514	172,732
Revaluation of Assets		44,791	-
Components of Net Cost of Operations Related to Transfer Accounts Where Budget Amounts Are Reported by Other Federal Entities (Note 14)		43,795	44,704
Other		(596)	5,685
Total Components of Net Cost of Operations That Will Not Require or	-	(530)	3,003
Generate Resources		273,504	223,121
Total Components of Net Cost of Operations That Will Not Require or Generate			
Resources in the Current Period		269,007	192,312
Net Cost of Operations	\$	656,460 \$	796,887
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