Dear ,

As you requested, we have used the average rate of return method to calculate the additional investment earnings that should be applied to the 401(B) Thrift Plan accounts of certain participants.

Please note the accumulated investment earnings calculation for the following participants resulted in a negative return of ($471.52) for the $58,932.44 of corrective contributions ER Name deposited for these participants on various VTDs in 2022. We recommend that you assume a zero accumulated investment earnings amount and, therefore not deposit any additional amount into these participants accounts:

**Insert Table Here**

To determine these investment earnings we first estimated the average earnings rates for the entire plan for each quarter beginning with the third quarter of 2022, the quarter in which the earliest corrective contribution applies, and for the month of July 2023. Each rate is estimated by assuming that contributions, benefit payments and all other plan financial activity occurred at the mid-point of the period. These average earnings rates were applied to the corrective contributions from the dates the contributions should have been made through the various deposit dates. We used a conservative approach for applying the earnings rates to the corrective contributions to assure the maximum return for the participant. Specifically, in a quarter when the plan earnings rate is positive we assume that contributions that should have been made in a month were made on the last day of the prior month. In a quarter when the plan earnings rate is negative we assume that contributions made in a month were made on the last day of that month. The difference between the accumulations and the amount of the corrective contributions is the additional investment earnings as of the various deposit dates. We adjusted these additional earnings with accruals through August 31, 2023 to arrive at the total amount of ($471.52).