Operating Fund Grant New Project Guidance

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

Financial Management Division

Table of Contents

Background

This guidance provides instructions to public housing agencies (PHAs) on the submission of new project/units for purposes of operating fund (OpFund) grant eligibility (pursuant to regulatory requirements at 24 CFR 990). According to 24 CFR 990.155 new projects/units are:

"New units that were added to the ACC, and occupied by a public housing-eligible family during the prior reporting period for the one-year funding period, but have not been included in the previous Eligible Unit Months (EUMs) data."

It is important to note that this guidance only addresses new project/units with units that are newly introduced to Public Housing and not regrouped or transferred from one PHA/project to another. Regrouped or transferred project/units are treated as existing project/units for purposes of OpFund grant eligibility calculation. New project/units can be added to the OpFund Grant Program only in accordance with regulatory requirements at 24 CFR 905, Subpart F: Development Requirements.

In order to be considered eligible for funding, new project/units, at a minimum, must be in the Inventory Management System (IMS) / PIH Information Center (PIC) with the following criteria:
- Annual Contributions Contract (ACC) Units
- Management Status
- Actual Date of Funding Availability (DOFA)

Funding for new project/units differs from existing project/units due to the timing and availability of certain data elements that drive the OpFund Grant formula. For example, new project/units lack sufficient utility information necessary to calculate a stand-alone Utility Expense Level (UEL). In addition, new project/units normally lack completed audited or unaudited Financial Data Schedule (FDS) data which is used to compute important formula elements such as formula income, audit costs, and Payment in-Lieu of Taxes (PILOT).

This document will describe how to develop appropriate estimates of these elements in their absence and ensure compliant OpFund Grant eligibility calculations.

Please note that this guidance does not address new Asset Management Project (AMP) numbers introduced to the Public Housing inventory through mixed-finance modernization. Please refer to each calendar year's OpFund Grant processing notice for more information on mixed-finance modernization.

Operating Fund Web Portal

The *Operating Fund Web Portal* brings OpFund Grant processing to a web-based platform. The *Operating Fund Web Portal* is a resource for FOs to navigate through the nearly 14,000 OpFund Grant requests submitted by PHAs and the 25 million data elements used to calculate OpFund eligibility.

Using the *Operating Fund Web Portal*, the PHA will be able to browse the list of potential new project/units. The deadline for PHAs to email requests for funding new project/units (hereinafter, "the funding deadline") can be found in each year's Operating Fund Grant Notice.

The Operating Fund Web Portal can be found at:
https://www.hud.gov/program_offices/public_indian_housing/programs/ph/am/webportal

Timeline for New Project/units

To receive funding for new project/units, PHAs must initiate the process by submitting an email to their Field Office (FO) requesting funding for a new project. The email must contain the project development number with text indicating it is a new project and the PHA would like to receive funding.

Throughout the funding year, the PH Financial Management Division (FMD) [the HUD Headquarters Office that processes the OpFund Grant] will generate a list of potential new project/units in PIC that meet the criteria listed above. This list will be viewable in the New Project section of the *Operating Fund Web Portal*.

The HUD Field Office will then confirm the eligibility of the new project in the *Operating Fund Web Portal*. Once confirmed by the Field Office, PH FMD will prepare and deploy electronic forms, *Operating Fund- Calculation of Operating Subsidy (*HUD-form 52723 and the *Operating Fund-Calculation of Utilities Expense Level* (HUD-form 52722) to the PHA.

Upon deployment, PH FMD will communicate to the PHA an appropriate *interim deadline*. The interim deadline is intended to advise the PHA on when to submit their completed HUD forms to avoid the risk of delayed funding. PHAs are strongly encouraged to submit their new project forms HUD-52723 and HUD-52722 tools as quickly as possible to avoid funding delays for their project.

The *funding deadline* is different from the *revisions deadline* (identified in each year's OpFund Grant processing notice) which is the final deadline for all new project submissions for that funding year. The final deployment of electronic forms HUD-52723 and HUD-52722 for new project/units will occur (generally) around June/July of the funding year. Each year's OpFund Grant processing notice will specify a deadline for submitting electronic forms HUD-52723 and HUD-52722 for new project/units.

Electronic forms HUD-52723 and HUD-52722 for new project/units received after this date will not be eligible for funding in the current funding year. PHAs will have to wait for the subsequent funding year to submit OpFund Grant for the new units. In the subsequent funding year, a PHA will be able to recapture the lost months of October to December of the prior year in Section 2, Column A, Line 4 of the form HUD-52723.

In general, there are three distinct periods for new project/units to be aware of:

a. **Units that become available between January 1 and the revisions deadline**: PHAs will prepare an OpFund Grant revision request prior to the revisions deadline. Once the

revision is approved and processed, the OpFund Grant for the new units will be retroactive to the month of initial occupancy.

b. **New units that become available between the revisions' deadline and September 30:** There is not sufficient time for HUD to review and process OpFund Grant revisions for project/units/units that come on-line between the revisions' deadline and September 30. Hence, these units cannot be funded for that specific timeframe; however, a PHA can begin to receive OpFund Grant for these project/units/units for the period beginning October 1. PHAs should include these new project/units/units with their OpFund Grant request for the upcoming funding period.

c. **New units that become available between October 1 and December 31:** When units become available after September 30 and before the PHA submits its OpFund Grant request for the upcoming funding period, the PHA will include these units on its initial OpFund Grant request (form HUD-52723, Section 2, Column A, Line 04). . The PHA then would be funded for the occupied unit months for October – December of the previous funding year.

Please consult the latest OpFund Grant Notice for the exact deadlines pertaining the current funding year. Operating Fund Grant Processing notices (by Calendar Year) can be found on PIH's Operating Fund webpage:
https://www.hud.gov/program_offices/public_indian_housing/programs/ph/am

1. **Example: New Project Funding**
A new project becomes available in February of the funding year. The PHA notifies in writing that the new project is eligible for funding in the current funding year by emailing the FO before the deadline. The electronic forms HUD-52723 and HUD-52722 are deployed in March. The PHA submits the new project tools to the FO before the deadline communicated by FMD. The project will then be funded in the next obligation increment proportionally for the period covering March to September 30.

2. **Example: New Project Deadline**
A new project becomes available in February of the funding year. The PHA notifies in writing that the new project is eligible for funding in the current year by emailing the Field Office before the deadline. The electronic forms HUD-52722 and HUD 52723 for the new project are deployed in May. The OpFund Grant processing Notice identified a deadline for submitting tools for new projects of July 21. The PHA submits the forms on August 1. The project will not be eligible to claim funding for the current year and must wait until the next funding year to submit a request for funding for the new project.

3. **Example: New Project Deadline Missed**
A new project becomes available in February of the funding year. The OpFund Grant Notice deadline for the PHA to submit a request via email for a new project is July 1 of the current funding year. On July 18, the PHA logs into the *Operating Fund Web Portal* and notifies via email their FO that three new project/units are eligible for funding. Since the PHA notified the FO after the June 1 deadline, then those new project/units will have electronic forms HUD-

52723 and HUD-52722 deployed in the next funding year. They will not be funded for the current funding year.

Reporting Period

Existing project/units use the reporting period July 1 (7/1) to June 30 (6/30) to determine unit status. The reporting period for existing project/units always begins 18 months before the start of the funding year and ends six months before its start. For example, if the current funding year is 2020 then the most recent reporting period is 7/1/2018 to 6/30/2019.

Since new project/units do not have unit status data for a full reporting period, special OpFund Grant processing procedures have been established for the funding of new project/units when they initially come on-line, which is explained in more detail below. This special procedure only applies until the project has data for a full reporting period, which will take one or two years. Then the PHA will be able to complete, the forms HUD-52723 and HUD-52722 following the procedures for existing project/units.

New Project/units Unit Status

In accordance with 24 CFR 990.155(b), new units/project/units shall be <u>assumed</u> occupied until they have a full reporting period of data. Until that time, all unit-months will be placed in Section 2, Column A, Line 3 "New units – eligible to receive OpFund Grant during the funding period but not included on Lines 01, 02, or 05-13 of this section" on the form HUD-52723.

Note that there may be partial pre-populated data found in the electronic form HUD-52723 for some new project/units. Since PHAs cannot edit most data in Section 2 of the form HUD 52723, PHAs will need to notify their FO to ensure that data is removed and moved to Section 2, Column A, Line 3.

Unit-months will be based on the Actual DOFA date of the project. The DOFA is used to determine the unit-months in the first year of funding. For instance, if the DOFA is on April 1 then the first year of funding will include nine months of eligibility. Line 3A will be used to account for the unit-months in the current funding year. Line 4A will be used to account for the three months October, November, and December in the prior funding year only if the PHA did not submit electronic forms HUD-52723 and HUD-52722 for new project/units it had in the prior year. No other lines in Section 2 shall be used for unit-months of new project/units. Please see examples below on how the DOFA date impacts the funding in year 1.

1. **Example: Unit Status with End of Month**
   A PHA elects to use End of Month (EOM) for the basis of unit-month reporting. If the project has 10 units with an Actual DOFA date of May 5th of the funding year, then it would have (10 units × 8 months) 80-unit months to place on Section 2 Column A Line 3 of the HUD-52723.

2. **Example: Unit Status with Beginning of Month**
   A PHA elects to use Beginning of Month (BOM) for the basis of unit-month reporting. If the project has 10 units with an Actual DOFA date of May 5 of the funding year, then it

would have (10 units × 7 months) 70-unit months to place on Section 2 Column A Line 3 of the form HUD-52723.

3. **Example: Ineligible Criterion**
   A PHA acquires a new project in April of the funding year. The PHA has entered the ACC units and Actual DOFA date in PIC. However, the project's status says Development. This project is not eligible for funding as a new project until that status is changed to Management. As a result, electronic forms HUD-52723 and HUD-52722 will not be deployed for the project.

4. **Example: New Project with Partial Pre-populated Data**
   A new single townhouse came online in May of the prior funding year, and the PHA/project elected to report on an EOM basis. They will have two unit-months in their pre-populated data in Section 2, Column A, Line 1 of their electronic form HUD-52723.

Line No.	Category	Column A Unit Months	El
Categorization of Unit Months:			
Occupied Unit Months			
01	Occupied dwelling units – by public housing eligible family under lease		
02	Occupied dwelling units – by PHA		

They will have two months because the periods May 31st and June 30th will be counted. The PHA will then zero out Line 1 and enter twelve unit-months on Line 3. When the PHA divides Section 2, Column A, Line 15 by twelve they get exactly one which equals the number of ACC units.

For Public Housing projects the number of months reported must be on the same basis (i.e., the first day of the month or the last day of the month) that is used when reporting units leased on the *Form HUD-52723 – Calculation of Operating Subsidy*

5. **Example: New Units Eligible on Line 4 After Deadline**
   A new multi-family residence with three units and an Actual DOFA date of May 5, in management status receives the necessary approvals from the FO to move into inventory in PIC on September 17 of the current funding year. However, this is after the date found in the OpFund Grant Notice for funding of new projects for the current funding year. No electronic forms HUD-52723 and HUD-52722 will be deployed for these projects in the current funding year. In the following funding year electronic forms HUD-52723 and HUD-52722 are deployed for this new project. The PHA will enter (3 unit-months for prior year × 3 units) = 9 unit-months in Section 2 Column A Line 4 of the HUD-52723 to account for October, November, and December in the prior funding year.

Line No.	Category	Column A Unit Months	E
Categorization of Unit Months:			
	of this section		
04	Occupied new units – eligible to receive funds from 10/1 to 12/31 of previous funding period but not included on previous Calculation of Operating Fund Grant		
Vacant Unit Months			

In addition, since the project does not have a full reporting year of unit status data in PIC they will enter (12 unit-months for current year × 3 units) = 36 unit-months in Section 2 Column A Line 3 of the form HUD-52723. Note that Section 2 Column A Line 15 will add to a total of 45 unit-months.

Line No.	Category	Column A Unit Months	El
Categorization of Unit Months:			
Occupied Unit Months			
14	Limited vacancies		
15	**Total Unit Months**		
16	Units eligible for funding for resident		

This amount exceeds the number of unit-months found in a normal funding year since the PHA is capturing three months in the prior funding year.

6. **Example: The Year After Deployment of a New Project Tool**
   The PHA receives a tool for a new project with three units and an Actual DOFA date of May 1 of the current funding year, which is before the new project funding deadline found in the OpFund Grant Notice. The PHA will enter (8 unit-months × 3 occupied units) = 24 unit-months in Section 2 Column A Line 3 of the form HUD-52723.

   In the following funding year, because PIC will not contain a full reporting period of unit status data, the PHA should enter (12 unit-months x 3 units) = 36-unit months in Section 2 Column A Line 3.

Line No.	Category	Column A Unit Months	E
Categorization of Unit Months: public housing			
03	Occupied new units – eligible to receive operating funds during the funding period but not included on Lines 01, 02, or 05-13 of this section		
04	Occupied new units – eligible to receive		

If HUD pre-populates any unit status data, the PHA should request the FO delete it. The PHA will not be able to claim any unit months on Section 2 Column A Line 4 of the form HUD-52723 because the project has already received funding in the prior year for these units.

Formula Income

Formula Income is calculated from the most recent audited submission of the project's financials in the Financial Assessment Subscoring System, FDS. The calculation divides net tenant rent by unit months leased to arrive at per unit month Formula Income (PUM FI). In the absence of FDS data the PUM FI can be estimated using the new project's rent rolls. The rent rolls submitted should be for every month the project had an occupied public housing project. Per 24 CFR 990.195(a), formula income is equal to rent charged tenants divided by unit months leased. *Therefore, the rents considered from the rent rolls must be only those rents charged for occupied Public Housing units, and the rent must be net of the utility allowance*. The PUM FI is derived by dividing the total rent charged for occupied Public Housing units per the rent rolls, divided by the number of occupied unit months for those public housing units. PHAs should attach a copy of the new project's rent rolls used to derive the PUM FI along with their electronic forms HUD-52723 and HUD-52722 tools.

In those rare instances where no units are occupied at the time the PHA submits the OpFund Grant forms, then the PHA may elect to use the PUM FI of a comparable project in the Public Housing portfolio or another PHA if another project does not exist. The PHA should consider the size, location, number of units, and other factors when making the determination on comparable projects. The comments section of the form HUD-52723 should clearly denote which development was used as the comparable project and why it was determined a best fit.

Note that either of these two methods are only applicable in the project's first year and second years, when no Net Tenant Rents are reported in the PHA's FDS financial statements.

1. **Example: Rent Roll Basis**
   A new project has 10 units and five are leased with varying net tenant rent amounts ranging from $100 to $300 totaling $1,000 per month. The PUM Formula Income would then be $1,000 ÷ 5 = $200. This amount would then be entered on Line 1 of Section 3 Part B of the form HUD-52723.

2. **Example: Comparable Project/units**
A PHA has a new vacant project. Rent information is not available to establish the PUM Formula Income. The PHA may elect to use a PUM FI from another project that it deems a "best fit." In this case, the PHA has a different, project in their portfolio that can be used to model the rents for the new project. This existing project has a PUM income of $350. The PHA will plug this figure into the Section 3 Part B Line 1 of the form HUD-52723 and provide the rationale in the comments section of the form.

Part B. Formula Income			
01	PUM formula income		
02	Resident paid utility (RPU) energy performance contract (EPC)		

Payment In-Lieu of Taxes (PILOT)

Regulatory requirements at 24 CFR 990.190(c) stipulate that "each PHA will receive an amount for PILOT in accordance with Section 6(d) of the 1937 Act, based on its cooperation agreement or its latest actual PILOT payment." Section 6(d) of the 1937 Act specifies the PILOT is equal to "10 per centum of the sum of the shelter rents charged in such project, or such lesser amount as (i) is prescribed by State law, or (ii) is agreed to by the local governing body in its agreement for local cooperation with the public housing agency required under Section 5(e)(2) of this Act, or (iii) is due to failure of a local public body or bodies other than the PHA to perform any obligation under such agreement."

For existing projects, PILOT is pre-populated in the form HUD-52723 by calculating 10 percent of shelter rents using FDS data. The PILOT for new project/units must be estimated because it will not have FDS data in time for the Operating Grant Fund processing. It can be calculated using the two-step method below. Note that estimating PILOT requires the PHA to choose a comparable project. The project should be of similar size, number of units, and location. If a PHA is using a comparable project for estimating Formula Income or UEL, they should use the same project for estimating PILOT.

Step 1: Divide the PILOT for an existing project (with similar characteristics) by PUM Unit Months

- Derived PUM PILOT = Section 3 Part A Line 09 ÷ (Section 2 Line 15A – Section 2 Line 4A)

Step 2: Estimate PILOT for New Project

- PILOT = Derived PUM PILOT × Line 15A (for New Project to be reported in the form HUD-52723)

The estimated PILOT and supporting documentation must be submitted along with the electronic forms HUD-52723 and HUD-52722.

Note that this methodology is only applicable in the project's first year and second years, when no PILOT costs are reported in the PHA's FDS financial statements.

Audit Costs

Independent Audit cost is reported for the OpFund Grant Program when required by the Single Audit Act or when a single audit is not required and the PHA elects to have a financial statement audit prepared. To include audit costs in the OpFund Grant, the actual, completed audit must be submitted to HUD. Audits are submitted electronically in accordance with the Uniform Financial Reporting Standards (24 CFR part 5 Subpart H).

For existing projects, PILOT is pre-populated in the form HUD-52723 by using FDS data. Audit Costs for new project/units must be estimated because it will not have FDS data in time for the Operating Grant Fund processing. It can be calculated using the two-step method below. Note that estimating PILOT requires the PHA to choose a comparable project. The project should be of similar size, number of units, and location. If a PHA is using a comparable project for estimating Formula Income or UEL, they should use the same project for estimating Audit Costs.

Step 1: Divide the Audit Costs for an existing project (with similar characteristics) by PUM Unit Months

- Derived PUM Audit Cost Section 3 Part A Line 10 ÷ (Section 2 Line 15A – Section 2 Line 4A)

Step 2: Estimate Audit Costs for New Project

- Audit Costs = Derived PUM Audit Costs × Line 15A (for New Project to be reported on the form HUD-52723)

The estimated Audit Costs and supporting documentation must be submitted along with the electronic forms HUD-52723 and HUD-52722.

Note that this methodology is only applicable in the project's first year and second years, when no Audit costs are reported in the PHA's FDS financial statements.

Utility Expense Level

The calculation of the Utility Expense Level ("UEL") is derived from several years of utility consumption data. The time period of this data follows the standard 7/1 to 6/30 reporting period. The UEL calculation uses the current 7/1 to 6/30 reporting period as well as the last three 7/1 to 6/30 reporting periods. The last three periods are used to calculate the Rolling Base Consumption Level (RBCL). 24 CFR 990.180 says "The rolling base consumption level (RBCL) shall be equal to the average of yearly consumption levels for the 36-month period ending on the June 30th that is 18 months prior to the first day of the applicable funding period." However, as mentioned in

the funding year section new project/units use a different methodology than the normal OpFund Grant formula because they will be missing the RBCL for the first few years.

Since the first year of a new project's life uses a different methodology that does not include utility consumption activity, the UEL will be derived from a comparable project. The comparable project should be of similar size and scope. It should also consider occupancy, consumption activity, and whether the utility pays for the same activity (i.e., PHA pays electricity for heat (which would be included in the form HUD-52722), residents pay electricity for lights and cooking (which would not be included in the form HUD-52722)).

Once a similar project is identified, the PHA will retrieve the PUM UEL on the Section 9 Line 26 of the form HUD-52722 of the similar project and place that on Section 3 Part A Line 5 of the form HUD-52723 of the new project. Note that the PHA does not submit a form HUD-52722 for the new project under this method. Only the PUM UEL needs to be added to the new project's form HUD-52723. The form HUD-52722 can be omitted because it is not used to calculate the PUM UEL. However, the PHA must provide in the comments section of the form HUD-52723 indicating the development number that was used as the basis for the PUM UEL and a description of why the PHA chose that development number as a comparable.

In the subsequent year of the new project's life, the PHA/project will have at least a partial reporting period of consumption activity to develop its own UEL using the form HUD-52722. In this stage the PHA/project will enter in the form HUD-52722 the actual partial consumption in Section 2 Line 1 and then enter the same amount on Line 7. The PHA/project will then annualize the number of missing months of consumption and enter this amount in Section 6 Line 14.

1. **Example: Initial Funding Year**
   A PHA has a new project on May 1st of the funding year. The PHA will choose a PUM UEL from a comparable existing project and enter that into Section 3 Part A Line 5 of the new project's form HUD-52723. The PHA will then populate the comments section of the form HUD-52723 with the development number of the comparable project and basis for the selection of that project. Please refer to Year 1 in Exhibit 1 of the Appendix.

2. **Example: Subsequent Funding Year with Partial Data**
   For the following funding year for the project in previous example, the reporting period in the subsequent funding year includes actual consumption information for two months: May and June. The PHA will report in Section 2 Line 1 and Line 7 of the form HUD-52722 the actual consumption of 5,000 gallons for a water utility type for the two months in the reporting period.

01	Actual consumption (12-month period 7/1/__ to 6/30/__)	
01a	Unit of consumption (e.q. consumption (Line 05 ÷ 3)	
07	Actual consumption for new units	
08	Rolling Base Consumption	

The PHA will then report in Section 6 Line 14 an estimate of the remaining 10 months in a full reporting period. In this case the PHA must extrapolate those 10 months by dividing the 5,000 gallons into the 2 actual months and multiplying by 10 months needed $[(5,0000 \div 2) \times 10] = 25,000$ gallons. This number will be reported in Section 6 Line 14 of the form HUD-52722.

14	Annualization of consumption for new units	
15	Payable consumption (Sum of	

Total payable consumption for the PHA in this case will be (5,000 actual gallons + 25,000 estimated gallons) = 30,000 gallons which will automatically be calculated on Section 6 Line 15 of the form HUD-52722. Please refer to Year 2 in Exhibit 1 of the Appendix.

3. **Example: Subsequent Funding Year with Full Data**
   In the third year of funding the PHA has a 12 months consumption information for the reporting period. The PHA will complete Section 2 Line 1 with the actual consumption in the reporting period for each utility type. In this case, the actual consumption for the 12-month reporting period is 29,500 gallons (which turned out to be different from the estimate mentioned in example 2) for the water utility type. The PHA will then report this same amount on Line 7 but leave Line 14 zero since Line 1 already includes a full twelve months of data. Please refer to Year 3 in Exhibit 1 of the Appendix.

01	Actual consumption (12-month period 7/1/___ to 6/30/___)	
01a	Unit of consumption (e.g. consumption (Line 05 ÷ 3)	
07	Actual consumption for new units	
08	Rolling Base Consumption	
14	Annualization of consumption for new units	
15	Payable consumption (Sum of	

4. **Example: Subsequent Funding Year with RBCL**
For the fourth funding year, the project had consumed 32,000 gallons of water for the reporting period. This will now be reported in Section 2 Line 1 of the form HUD-52722. The prior reporting period also contained twelve months of consumption data so the 29,500 gallons consumed will be reported on Line 2. Since Line 3 and 4 have partial or no data, PHAs must use the value from Line 2. *Therefore, Lines 2, 3, and 4 will all be equal at this stage.* The RBCL on Line 5 of the form will be equal to the three prior reporting periods. Nothing needs to be entered on Lines 7 and 14. Please refer to Year 3 in Exhibit 1 of the Appendix.

01	Actual consumption (12-month period 7/1/___ to 6/30/___)	
01a	Unit of consumption (e.g., gallons, kWh, therms)	
02	Rolling base year 1- actual consumption (12-month period 7/1/___ to 6/30/___)	
03	Rolling base year 2 - actual consumption (12-month period 7/1/___ to 6/30/___)	
04	Rolling base year 3 - actual consumption (12-month period 7/1/___ to 6/30/___)	
05	Total consumption during 3-year rolling base period (Line 02 + Line 03 + Line 04)	
	consumption (Line 05 ÷ 3)	
07	Actual consumption for new units	
08	Rolling Base Consumption	
14	Annualization of consumption for new units	
15	Payable consumption (Sum of	

5. Example: Subsequent Funding Year with Different RBCL
For the fifth funding year, actual consumption data for the reporting period will be entered into Line 1. Line 2 will inherit the previous year's Line 1 actual consumption data and Line 3 will inherit the previous year's Line 2 value. Line 4 in this year will be set equal to Line 3 since the reporting period aligned to Line 4 contains only partial data. Since Line 2 is different from Lines 3 and 4 the RBCL will now have a different value from the last three reporting periods. Please refer to Year 3 in Exhibit 1 of the Appendix.

Appendix

Exhibit 1: HUD-52722 UEL with Partial Year (2 months) and Full Year (12 months) Data

Scenario	No Data	Partial Data	Full Data	Full Data
Year	1	2	3	4
Form	HUD-52722	HUD-52722	HUD-52722	HUD-52722
Utility	Water	Water	Water	Water
Unit of Measure	Gallons	Gallons	Gallons	Gallons
Line 1	No HUD-52722	5,000	29,500	32,000
Line 2	required. PUM	-	-	29,500
Line 3	UEL will be	-	-	29,500
Line 4	selected from	-	-	29,500
	similar			
Line 7	development.	5,000	29,500	-
Line 14		25,000	-	-
Line 15		30,000	29,500	29,500