State Retirement Agency

Response to Questions Received from DLS

December 16, 2021

DLS requests SRA to comment on actions taken to maintain target asset allocations, and how the system managed its asset allocation during fiscal 2021 while experiencing significant investment growth.

During periods of high volatility and large swings in asset prices, allocations to various assets classes can change significantly and abruptly. Fiscal year 2021 was a good example of this kind of environment, with stocks up 40% and bonds earning a modest negative return. To manage these large swings, it is important to be able to measure and report exposures to the various asset classes on a daily basis. As part of the risk management function, staff has developed a process to report asset class exposures each day with detailed information regarding overweights and underweights relative to the policy benchmarks. With this information, staff can choose to rebalance by selling assets classes that are above the desired allocation or buying asset classes that are underweight. While the Board has set target allocations to each asset class, it has also provided discretion to staff by approving ranges around the targets. Staff is in compliance with the Board's asset allocation policy if the asset class exposures fall within the approved ranges. For example, the Board's approved long-term target allocation to investment grade bonds is 21%. The approved range around this target is +/- 5%, providing staff the flexibility to position this asset class between 16% - 26%. These ranges allow staff to make tactical portfolio tilts to take advantage of perceived market opportunities and avoid excessive trading costs associated with strict policy targets.

Not all asset classes have the same level of liquidity. While traditional asset classes like public stocks and bonds are liquid and can be traded relatively easily, other asset classes like private equity and real estate are illiquid and staff has limited ability to rebalance these asset classes. The Board has addressed this liquidity mismatch among asset classes by using liquid public asset classes to offset the deviations from policy targets in illiquid private assets. For example, the long-term policy target allocation to private equity is currently 16%. However, due to the strong performance of this asset class, the current allocation to private equity is 18%. To accommodate this difference, the over-allocation to private equity is offset by a corresponding reduction in the target allocation to public equities. For private real estate, deviations from policy targets are allocated to the rate sensitive asset class. This flexible asset allocation policy has allowed the System to avoid forced transacting in the private markets at potentially sub-optimal pricing levels.

Staff has also developed efficient and flexible ways to rebalance the portfolio. Asset class exposures can be adjusted by buying cash securities in the open market, or staff can rebalance using derivative instruments. While effective, transacting in cash securities can be less efficient and take longer to implement. This method requires staff to instruct an account manager to trade on the System's behalf, and it takes time for the manager to model the transaction and execute through a broker. As an alternative to cash securities, staff can also adjust exposures through the derivatives market. This process is quicker than trading in cash securities and provides staff more control in the timing and execution of the trade.

The derivatives market also provides staff with more flexibility regarding liquidity, as these instruments can be funded with margin collateral that is typically much less than the notional amount of the trade.

DLS requests SRA to comment on the fiscal 2021 return performance in relation to the policy benchmarks. For any asset classes and asset sub-classes that underperformed the benchmark, SRA should comment on the factors that led to the underperformance, whether those factors are expected to negatively affect performance in fiscal 2022, and to comment on what actions are being taken to mitigate those factors from impacting the fiscal 2022 returns.

In fiscal year 2021, the System achieved an investment return of 26.69%, marking one of the best fiscal year performance on record. This return significantly outpaced the Board's policy benchmark of 24.43% by 2.26% and far exceeded the assumed actuarial rate of 7.40%. The policy benchmark is the weighted average of each of the individual asset class benchmarks and represents what the System would have returned if the asset class benchmark returns were achieved. The System's excess return relative to its policy benchmark equates to approximately $1.2 billion in added value. Roughly 70% of the value of the total fund achieved excess returns over respective policy benchmarks, while 30% underperformed. The total fund excess return of 226 basis points was a product of strong performance in the asset classes of public equity, rate sensitive, credit and real estate. Over the ten years ending June 30, 2021, the System has achieved an average annualized return of 8.15%, beating the policy benchmark of 7.55% by 60 basis points annualized net of all fees and expenses. In dollar terms, this represents approximately $2.8 billion in additional value.

The Board of Trustees does not expect each asset class to outperform every year, but instead across economic cycles. Investment Division staff reviews the performance of underperforming asset classes to assess whether the performance is consistent with expectations, or a sign of a longer-term problem. In fiscal year 2021, three asset classes representing roughly 30% of the portfolio trailed the performance of their respective benchmarks – natural resources and infrastructure, private equity and absolute return.

The natural resources and infrastructure portfolio, which is a sub-asset class of the real assets category, achieved a return of 27.34%, trailing its benchmark return of 37.07% by 9.73%. This portfolio is difficult to benchmark, as it consists of roughly 34% private market investments, while the benchmark includes only publicly traded securities. Fiscal year 2021 was unique in that public equities rebounded sharply as the economy recovered from the effects of Covid-19. While the System's natural resources and infrastructure portfolio achieved a strongly positive return of over 27%, it was not able to keep up with the public equity benchmark. The private market component of the System's portfolio consists of some strategies that have different risk and return characteristics than the benchmark and results are reported with a lag. For example, the System's portfolio includes private timber investments that have lower long-term return expectations than public equity, but with lower volatility linked more closely to inflation. In fiscal 2021, the timber portfolio achieved a return of 5%, closely matching long-term return expectations, but falling well short of the public equity benchmark. The reporting lag was an important factor in 2021. Private asset valuations move in tandem with public markets but are smoothed through the use of appraisal pricing and they usually are reported with a one quarter lag. The private natural resources and infrastructure assets included valuations for the period March 31, 2020 to March 31, 2021, including the

relatively weak period ending June 30, 2020 and not including the strong period ending June 30, 2021. Going forward, the focus of this portfolio will transition to a higher allocation to private infrastructure investments. As this transition is implemented, staff and the consultant will work with the Board to possibly move to a more appropriate manager universe benchmark with more of a private market focus.

The absolute return segment also slightly lagged its benchmark in fiscal year 2021, returning 15.51% versus the benchmark return of 16.15%. The absolute return portfolio has less sensitivity, or correlation, to the public equity markets than the asset class benchmark. Because of this lower equity beta, the portfolio is prone to underperform during periods of strong performance in stocks as seen in fiscal year 2021. In addition, several managers in the System's global macro strategy segment significantly underperformed their respective benchmarks, generating a return of 5.15% against the global macro benchmark return of 14.58%. The absolute return benchmark in fiscal year 2021 was the HFRI Fund of Funds Conservative Index plus 100 basis points. This index historically had reflected many of the attributes that the Board sought for the asset class, including less volatility and lower correlation to equity markets. Over recent years, the composition of this index has changed as there are far fewer constituents than there were ten years ago, which has resulted in a less diversified index. As a result, the Board recently changed the absolute return benchmark to a blended index that consists of 50% HFRI Relative Value, 25% HFRI Global Macro, and 25% HFRI Event Driven. This new benchmark will align more closely with the implementation of the portfolio and be less sensitive to the performance of individual fund outliers.

For the year ending June 30, 2021, private equity was the System's top-performing asset class, returning 51.85%. Despite the strong performance, it underperformed its benchmark performance of 53.13%. The return difference was mainly driven by the System's relative underweight and underperformance in venture capital investments, which was the best performing sub-strategy within private equity in fiscal year 2021. As of June 30, 2021, the System's exposure to venture capital was 11% versus roughly 14% for its benchmark. For the fiscal year, the System's venture capital portfolio returned 57.64%. While this return represents very strong performance, it trailed the venture capital return of a common industry database of 82.05%. While the private equity portfolio underperformed its benchmark for the fiscal year, it consistently outperforms the benchmark over longer periods. Further, the venture capital performance is the result of the System having a relatively young venture portfolio compared to the benchmark. The System's venture funds continue to perform well relative to similar vintage funds but not relative to funds just a few years more mature. Table 1 below shows the performance of the System's private equity program relative to the benchmark over the last ten years.

Table 1
MSRPS Private Equity Performance
As of June 30, 2021

	1-Year	3-Years	5-Years	10-Years
Maryland Private Equity	51.85%	20.93%	19.76%	15.97%
Private Equity Index	53.13%	18.52%	17.00%	13.08%
Excess	-1.28%	+2.41%	+2.75%	+2.89%

DLS requests that SRA comment on the relative TUCS performance rankings by asset class and how overall asset allocation impacts the total system's TUCS rankings.

As noted in the DLS Investment Overview, the System's one-year total fund performance compared against a peer group of other large public pension plans ranked in the 64th percentile. Peer group rankings are mainly driven by two factors – asset allocation and implementation of the asset allocation. Asset allocation refers to the way the fund assets are distributed to the various asset classes, and implementation refers to staff's ability to select skillful managers and tactically position the portfolio to take advantage of market opportunities.

An effective method to determine which of these factors is driving the total fund peer rankings is to analyze the peer ranking of each individual asset class. As noted in the DLS report, most of the System's asset classes have achieved above median returns. Private equity, the System's best-performing asset class, representing roughly 17 percent of total fund assets, has consistently ranked in the top quartile of the peer group over time. In fact, for the ten-year period ending June 30, 2021, the System's private equity portfolio is ranked in the 1st percentile. That the individual asset class rankings are higher than those of the total fund supports the notion that the mix of asset classes is mainly driving the results, and not the performance of the individual asset classes. For example, the System has higher target allocations to non-U.S. equities than the average peer in the universe. Over the past ten years, U.S. stocks have significantly outperformed foreign stocks. The System's relative underweight to U.S. stocks has resulted in a lower peer ranking than would be assumed based solely on rankings of individual asset classes.

The System typically reports its peer rankings against a relatively small universe of roughly thirty public pension plans on a gross-of-fee basis. Given the System's asset allocation, with a relatively higher allocation to private market investments like private equity, private credit and real estate, it might also be instructive to measure performance against a larger universe on a net-of-fee basis. Private investments typically do not report gross investment returns, but only performance net of all fees. As a result, the System's gross returns are a combination of gross and net, with the gross returns reflecting approximately 25 basis points of the roughly 65 basis points to total management fees incurred. To the extent the System invests more heavily in private investments, the difference between the gross and net numbers will be smaller relative to a peer plan that a higher allocation to traditional assets. This is illustrated in Table 2 below, which ranks the System's performance against a larger universe of seventy-seven public pension plans after investment expenses have been netted out.

Table 2
Total System vs. Public Plans > $1 Billion Universe
(June 30, 2021 net of fees)

	1 Year	**3 Years**	**5 Years**	**10 Years**
Total System	**26.69%**	**11.78%**	**10.68%**	**8.15%**
Rank	**53**	**21**	**43**	**51**

* **Represents the InvMetrics Public Defined Benefit > $1 billion peer group**

The focus on investment performance tends to be on returns. However, the Board and staff recognize that risk is equally important. To get a more complete picture of the System's investment program, risk-adjusted returns should also be evaluated. The System's risk profile, as measured by the dispersion of returns around the mean, falls in the bottom quartile of the peer group. This lower risk posture has been achieved by targeting a lower relative weighting to public stocks versus the peer group. Sharpe ratio is another metric that accounts for risk in the assessment of investment performance, and represents risk-adjusted returns, or returns per unit of risk. Based on the Sharpe ratio measure, the System ranks in or near the top decile (better than 90% of funds) over the last three and five years. This is illustrated in Table 3 below, which ranks the System's Sharpe ratio against a larger universe of seventy-seven public pension plans after investment expenses have been netted out.

Table 3
Total System vs. Public Plans > $1 Billion Universe
Sharpe Ratio Comparison
(June 30, 2021 net of fees)

	3 Years	5 Years
Total System	1.3%	1.4%
Rank	5	11

Represents the InvMetrics Public Defined Benefit > $1 billion peer group

Given the historic low rate of return, underperformance relative to benchmarks, and high management fee structures, DLS requests SRA to comment on the returns of the absolute return asset class, including the market conditions leading to the low level of returns and benchmark underperformance, and what market conditions would result in markedly improved returns for investments in the asset class.

The objective of the System's absolute return asset class is to provide diversification and risk reduction to the total fund by having little exposure to the common risk factors found in the rest of the portfolio. The return objective is to outperform a cash return by 4% over a full market cycle, recognizing that shorter-term performance can deviate from this objective significantly. The portfolio has a further objective of maintaining diversification when equity markets are volatile, and returns are negative. Recently, the absolute return portfolio has met this objective, achieving a strong 2021 fiscal year return of 15.51% and outpacing the return target over the last two years. However, over the longer-term, this return objective has not been met. There are several reasons for this underperformance related to the market environment and exposure to common risk factors.

Hedge funds comprise most of this asset class and are characterized by trading strategies that attempt to take advantage of relative value opportunities between different securities and asset classes. The most favorable environment for this type of trading is one where volatility is high, correlations are low, and dispersion is high. Volatility is the degree to which asset prices fluctuate, correlation is the degree to

which assets move in the same direction, and dispersion refers to the difference in asset price movements regardless of whether they are moving in the same direction. Essentially, hedge funds have historically performed best in more chaotic markets. If high dispersion and uncertainty remain in the markets, and stocks and other risk assets do not move consistently higher, hedge funds are likely to do well.

The absolute return asset class has struggled to outperform its benchmark, which has been the HFRI Fund of Funds Conservative Index plus 100 basis points. The HFRI benchmark captured most of the risk and return nature of the asset class, but it is comprised of funds of funds that have significant exposure to the direction of stocks. The benchmark does not have the attribute of protecting asset values when stocks are falling sharply. Much of the past underperformance can be attributed to purposeful portfolio design to have less equity risk relative to this benchmark to offer better downside protection over a ten-year period of rising equity prices. In addition, the portfolio was overly concentrated in low volatility, low correlation multi-strategy relative value managers that were mostly focused on investing in the U.S. Essentially, the portfolio was too conservative, running with less volatility than the benchmark and did not include an appropriate number of return drivers. It is important to note that the System was unique in adding 1% to a market index as a benchmark. As of fiscal 2019, 17 of the 30 largest U.S. public plans had absolute return/hedge funds as part of their asset allocation. Six of those used a benchmark of a positive spread over cash returns such as T-bills plus 3%. Of the remaining 11, Maryland was the only System to add a spread (1%) to its market benchmark. The addition of 1% improves the likelihood that the benchmark achieves the long-term return objectives but carries an implied level of outperformance that does not exist in other asset classes. It is important to note that the new absolute return benchmark, effective December 1, 2021, does not include this 1% spread.

The absolute return portfolio has been able to generate positive relative performance during equity drawdowns due to its lower risk posture and lower equity sensitivity. The fourth quarter of 2018 and first quarter of 2020 are examples of markets where absolute return outperformed by 2.2% and 0.5%, respectively. These periods demonstrate the diversifying characteristics of the portfolio to the plan, and potential for outperformance versus the benchmark during drawdowns. Going forward, the objective is to continue to preserve value when equity markets struggle but also keep pace during normal equity environments.

The absolute return portfolio has undergone a significant amount of change over the last several years. In 2021 alone, seven managers have been hired through December 1st, representing one billion dollars in committed value. Additionally, two managers have been terminated through this period. Staff has continued to improve management fee arrangements by lowering the base management fees and increasing the incentive fees, improving alignment between the manager and the System. Staff has also been more active in co-investments in calendar year 2021, investing approximately $77 million in co-investments and related fee-advantaged accounts. Staff is working on additional changes, including increasing the efficiency of the portfolio through improved cash management and seeking higher return or diversifying mandates that will better position the portfolio in the future. The restructuring to date, in addition to what is planned for the near future, will result in a more diversified and balanced strategy allocation that should increase the volatility to a level closer to target, provide more consistent returns relative to the benchmark, and still provide diversification benefits to the plan during challenging market periods.

As a result of the recent asset allocation, the Board reduced the target allocation to absolute return from 8% to 6% of the total fund. This change acknowledges the continued attractiveness of the risk and return profile of the asset class, but at a reduced level, in recognition of the diversifying properties of other asset classes with lower cost structures.

DLS requests SRA to provide an update on estimated carried interest for fiscal 2021.

The System records carried interest earned by its managers on a calendar year basis to align with the reporting schedule for audited financial statements for most of the System's alternative investment vehicles. In calendar year 2020, the System's managers earned carried interest of $203.6 million. It is important to distinguish the difference between management fees and carried interest, or performance incentives, as many private market investors do not consider incentive fees to be management fees. Management fees are contractual obligations that must be paid regardless of performance. Incentive fees, which primarily apply only to private market investments and not traditional asset classes, represent a portion of investment profits that is earned by a manager, and are only paid if performance thresholds are achieved. They are used to motivate the manager to make profitable investments, and to ensure alignment of interests. The percentage of profits that is allocated to the manager is substantially lower than the amount received by the System. Because of this disproportionate sharing of profits, the amounts realized by the System would far exceed any incentive fees paid to managers. Large amounts of carried interest should be considered a positive result, as this would imply much greater gains to the System at a level of roughly fourfold. Based on the amount of carried interest earned in 2020, the implied gains to the System over a period of several years would equate to approximately $800 million. While the System would like to see an improved profit-sharing allocation in favor of the investor, and negotiates contract terms aggressively where possible, the overall market, consisting of both managers and investors, establishes the sharing percentages. If the System avoided these investments based on the fee structure alone, it would not have experienced the superior net-of-fee returns provided by private equity relative to all other asset classes.

As part of the Investment Division staff's incentive compensation is tied to performance relative to benchmarks, DLS requests SRA to comment on whether there will be any review of the benchmark performance thresholds that must be met to be eligible for incentive compensation.

Most of the recent asset allocation changes involve small changes to benchmark weightings, and not changes to the benchmarks themselves. As a result, these minor changes to the benchmark weightings would not warrant adjustments of performance thresholds for incentive eligibility. For example, in the Growth asset category, the Board approved an increase in the target allocation to private equity from 13% to 16%. To offset this increase in private equity, public equity was reduced by 3%, with 1% taken from each of the public equity sub-asset classes – U.S. equity, developed international equity and emerging markets equity. These 1% reductions resulted in slight changes to the sub-asset class weightings in the total equity benchmark, but not to the underlying benchmarks. Table 4 below shows the public equity benchmark weightings before and after the asset allocation changes

Table 4
Public Equity Benchmarks

Index	*Before Asset Allocation Change*	*After Asset Allocation Change*
Russell 3000	43%	44%
MSCI World ex-U.S.	27%	27%
MSCI Emerging Markets	30%	29%

As highlighter earlier, the recent asset allocation review did result in one significant benchmark change to the absolute return asset class. This change was adopted out of necessity as the prior benchmark was becoming obsolete due to an insufficient number of fund constituents to make the benchmark meaningful. The new benchmark offers similar correlation and equity market sensitivity to what is targeted for the absolute return portfolio. It also captures the majority of the opportunity set being pursued by staff and will exhibit better diversification than the prior benchmark. The current incentive thresholds for the absolute return asset class appear to be appropriate relative to the new benchmark, as the returns for this benchmark have outperformed the System's absolute return portfolio over the last 5, 7 and 10 years on an annualized basis.

While the recent benchmark changes did not warrant changes to the incentive thresholds, the Board is required to review staff's compensation and incentive structure at least every five years. This review includes input and recommendations from the Objective Criteria Committee and an independent external compensation consultant. The Board conducted the initial review in 2018 and the next analysis is expected to be completed within the next two years.

DLS requests SRA to provide an update on any Investment Division implementation of internal management of system assets and the development of necessary compliance and controls on the use of internal asset management. More specifically, SRA should comment on how the Investment Division:

- **has developed proficiency in managing assets currently being managed internally;**
- **will develop proficiency before expanding into internal management of additional asset classes;**
- **will evaluate the performance of internal management compared to available external management services; and**
- **will develop methodologies for determining fee savings achieved through internal management.**

The System has been working to develop its internal management capabilities since 2016. The initial efforts were geared to building the ability to execute trades internally. Elements of this process included establishing procedures to evaluate and select brokers, create operational processes to execute and communicate trades to the custodian and procure contracts with Futures Clearing Merchants. These processes supported the level of activity that was occurring historically and were necessary steps toward building an internal management process.

In 2019, staff worked with the Attorney General's office and external counsel to create policies and procedures for internal management including enhanced policies governing staffs' personal trading, conflicts of interests and handling of material non-public information. These policies and procedures were approved by the Board or codified in the Division's Operations Manual in early 2020. In 2020, the System procured a trade order management system to handle the processing of trades including pre-trade compliance and straight-through processing.

The proficiency of internal staff to manage internal portfolios has come in two ways. Existing staff had prior experience in managing assets directly and prior direct management experience was a major factor in the hiring process for new staff members.

The System has a rigorous product development process, the elements of which include:

1. Identify a potential product for internal management that staff expects to be able to execute as well or better than external managers
2. Develop guidelines that detail the performance objective, portfolio construction limits, and reporting requirements
3. Create portfolio management tools to execute the strategy
4. Manage a paper portfolio with pre-approval of every trade and creation of complete reporting package
5. Test the trading platform and provide training to middle and back office team as needed
6. Engage with the General Consultant for an independent operational due diligence evaluation and address any shortcomings identified
7. After demonstrating proficiency, present a full diligence memo to the internal investment committee and respond to questions and other follow up items
8. With internal investment committee approval, establish a portfolio inception date with the Chief Investment Officer including a source of funding

As of June 30, 2021, three internal portfolios valued at $6.8 billion had been established following this process: U.S. TIPS, U.S. Long Government Bonds and Russell 1000 equity. Since that time, three additional internal portfolios have been funded: U.S. small cap equity, investment-grade corporate bonds and U.S. securitized bonds. As of October 31, 2021, these six internally managed portfolios totaled $9.1 billion, representing 13% of the total fund.

The division has built a process that is designed to evaluate the internal products in a manner similar to the selection and oversight of external managers. This includes presenting the strategy to the internal investment committee in the same manner as external managers. It also includes independent annual evaluation of the product by the System's general consultant. The division has also created an Internal Management Oversight Committee to provide independent evaluation of the efficacy of the strategies and managers. This group exists so that the investment teams are not put in the position of evaluating their own products. Finally, each quarter, every asset class reports to the internal investment committee on the performance of the asset class including individual manager performance. At these meetings, the committee members often challenge the team on the efficacy of continuing to retain underperforming managers.

The Board and Investment Division have a three-pronged plan to enhance the ability of achieving the investment objectives of the plan. The first prong focuses on continual improvement in the asset allocation process. The second is improving implementation of that asset allocation through improved staffing and resourcing of the division and the third is to lower the cost of managing the assets through direct fee negotiations, direct management of public assets and direct management of private assets through co-investment. To evaluate the effectiveness of the cost improvement plan, the division is using 2017 as a baseline for the cost of the System's investment management program. As shown in Table 3 below, the System ended 2017 with a fee structure that was approximately 64 basis points (0.64%), or $317 million per year on an annual run rate. This figure does not include incentive fees or carried interest, as those are variable making year to year comparisons difficult to interpret and generally carried interest means the System has had a positive investment experience.

Through 2021, the System's asset allocation changed to include more higher cost asset classes (private equity, private real estate and emerging market stocks), resulting in a higher modeled total fund fee structure of roughly 69 basis points. The actual fees paid by the System were much less than this level, falling to 56.3 bps by the end of 2020. These savings are the result of a combination of lower fees negotiated with managers, the growth of the co-investment portfolio and the growth of assets being managed internally. The large drop in fiscal 2021 was driven by two factors: the growth of internally managed assets including private market co-investments and the greater than 50% growth in the value of the private equity portfolio. Private equity fees are computed on the amount committed to funds, not the net asset value. Committing $100 million to a fund with 2% management fee will result in $2 million in annual management fees. If the fund is fully invested and the net asset value grows to $200 million, the fee will remain unchanged at $2 million, but the fee as a proportion of net asset value will fall from 2% to 1%. In 2021, with the strong returns in private equity, this effect resulted in significantly reduced fees as a percentage of net asset value, from 168 basis points in 2020 to 128 basis points in 2021. On this measure, private equity fees should be expected to revert to somewhat higher levels in futures years, but still remain lower than 2020 levels.

The asset allocation changes adopted in September 2021 will increase the fee expectation by roughly 1.5 basis points per year when fully implemented.

The Investment Division will use this methodology to track its effectiveness in lowering the cost of managing assets over the ensuing years and expect an additional 9 basis points of annual fee savings through 2029. The associated costs of achieving these savings are expected to be on the order of 2-3 basis points.

Table 5

Management Fee Model

Stylized Model of Fees (Excluding Incentives)		
	BPS	Dollars
2017 Actual Allocation and Actual Fees	64.0	$317
2017 Board Allocation and Actual Fees	64.0	$317
2029 Fees with 2017 Asset Allocation and Fees	64.0	$562
Impact of Board Asset Allocation Changes through 2021	4.9	$33
Impact of Fee Savings Achieved Through 2021	(12.9)	($87)
Impact of 2022 Allocation Change	1.5	$13
Impact of Fee Savings Projected to 2024	(3.0)	($23)
Impact of Fee Savings Projected to 2025 -2029	(6.0)	($45)
2029 Fees	48.5	$424
Projected Annual Fee Savings	(15.5)	($135)