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Exhibit No.:

Issue: WNAR tariff

Witness: Michael L. Stahlman

Sponsoring Party: Type of Exhibit: MO PSC Staff
Direct Testimony

Case Nos.:

GO-2019-0058 GO 2019-0059

Date Testimony Prepared:

November 15, 2018.

# MISSOURI PUBLIC SERVICE COMMISSION

## **COMMISSION STAFF DIVISION**

TARIFF/RATE DESIGN

DIRECT TESTIMONY

OF

MICHAEL L. STAHLMAN

SPIRE MISSOURI INC., d/b/a SPIRE
CASE NOS. GO-2019-0058 and GO-2019-0059

Jefferson City, Missouri November 2018 Date 1-15-19 Reporter 814 File No. GO-2019-0058 GO-2019-0059

1		DIRECT TESTIMONY
2		OF
3		MICHAEL L. STAHLMAN
4		SPIRE MISSOURI INC., d/b/a SPIRE
5		CASE NOS. GO-2019-0058 and GO-2019-0059
6	Q.	Please state your name and business address.
7	A.	My name is Michael L. Stahlman, and my business address is Missouri Public
8	Service Con	nmission, P.O. Box 360, Jefferson City, Missouri, 65102.
9	Q.	By whom are you employed and in what capacity?
10	A.	I am employed by the Missouri Public Service Commission ("Commission")
11	as a Regulat	ory Economist III in the Tariff/Rate Design Department.
12	Q.	Please describe your educational and work background.
13	A.	Please see Schedule MLS-d1.
14	Q.	What is the purpose of your testimony?
15	Α.	The purpose of my testimony is to explain why Staff recommends rejection of
16	Spire Misso	uri Inc., d/b/a Spire's ("Spire") proposed Weather Normalization Adjustment
17	Rider ("WN	AR") rates for both its Spire Missouri East and Spire Missouri West divisions,
18	filed on Aug	gust 31, 2018. Briefly, Staff is recommending rejection because Spire ranks the
19	normal weat	her to 2016 actual weather, when Spire's tariff requires the normal weather to be
20	ranked to the	e actual weather of the accumulation period, which in this case is April through
21	July of 2018.	. Instead of the WNAR rates filed by Spire, the appropriate WNAR rates should
22	be \$(0.00050	and \$0.00084 for Spire Missouri East and Spire Missouri West, respectively.
23	Staff further	recommends the Commission order Spire to use Staff's ranked method for

23

1 calculating WNAR rate adjustments in future WNAR filings, to be consistent with the WNAR 2 tariff language. This ranked method is discussed below and in the testimony of Staff witness 3 Dr. Won. What tariff language specifies how the normal heating degree days ("NDD") 4 Q. 5 are to be calculated? 6 A. Tariff Sheet No. 13 for both Spire Missouri East and Spire Missouri West 7 define NDD as "the total normal heating degree days based upon Staff's daily normal weather 8 as determined in the most recent rate case." 9 Q. Does the tariff language require Spire to use the same ranking that was used in 10 the most recent rate cases? 11 A. No. The tariff language specifies that the degree days be "based upon Staff's 12 daily normal weather as determined in the most recent rate case", not the daily normal weather in the most recent rate case. Staff's ranked method is how Staff's daily normal 13 weather was determined in the most recent rate case. The tariff language was written thus 14 because Staff's ranked method requires the normal weather to be ranked consistent with the 15 actual weather of the period. The words "based upon" also allow Spire to properly account 16 for February 29th, as the test period in the last rate case was during a leap year. Staff witness 17 18 Dr. Won further discusses the ranked method. 19 Q. Why did the tariff language not include "method" to state "based upon Staff's 20 daily normal weather method"? 21 A. The inclusion of the word "method" could imply that Spire would need to 22 recalculate normal weather by rolling the 30 year period forward to the current period.

However, it is important to maintain the 30 year normal period that was established in the

rate case because that was the basis for the coefficient ("\beta") used in Spire's tariffs; changing the period would change the relationship between the calculated normal weather and natural gas usage.

- Q. What is the impact of Spire's method of maintaining a 2016 rank?
- A. Spire's method increases the volatility of the WNAR adjustment, which will also result in an inaccurate adjustment. This is demonstrated in the attached worksheet, Schedule MLS-d2. In that worksheet, I assumed a scenario where the actual weather's heating degree days was exactly the same as the normal weather established in Spire's last rate case, but I rearranged the order of those days so the hypothetical actual weather was coldest at the beginning of the first month then coldest at the end of a second month. Maintaining the 2016 ranking would result in a large adjustment for that billing cycle, while appropriately re-ranking the normals resulted in no adjustment since the overall hypothetical actual weather was the same as the normal weather.
- Q. Can you provide a simplified example of the scenario discussed in that worksheet?
- A. Yes. Table 1 below provides a simplified version of the scenario above for just two days. Postulate that the 2016 heating degree day normal for day 1 is 10 (meaning, the average daily temperature was 55 degrees) and the heating degree day normal for day 2 is 5 (meaning, the average daily temperature was 60 degrees). Now postulate that the actual heating degree days for day 1 and day 2 is 5 and 10 respectively. Under Spire's method, day 1 requires an adjustment of 5 degree days and day 2 requires an adjustment of -5. However, if the normals are properly re-ranked, there is no adjustment necessary for either day.

1

Table 1: Simple Comparison of Hypothetical Cycle where the Actual Weather is the Same as Normal, but in a Different Order

	30-Year Mean	Normal HDD	Actual Daily Mean		0.5000000000	Normal HDD	10 海道化
	Daily Temperature	("NDD") from	Temperature for	Actual	5 (1) (1)	Ranked for	3 3 30 6
	from Test Year of	Test Year of	Current WNAR	HDD	Spire's	Current WNAF	(NDD-ADD)
1	Rate Case	Rate Case	Period	("ADD")	(NDD- ADD)	Period	per Tariff
Day 1	55	10	60	5	5	5	1
Day 2	60	5	55	10	-5	10	100 100 100 20

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Q. Wouldn't the plus five and minus five cancel out in the simple comparison

above?

A. Potentially, but in the more realistic scenario it would be unlikely. This is because Spire has 18 billing cycles in a given calendar month, which means that the Day 1 and Day 2 for some of the customers would be in different billing cycles. The attached worksheet, Schedule MLS-d3, shows this scenario in further detail. However, even though

the (NDD-ADD) values would be negated, the calculated WNAR rate would be incorrect if

9

there is any customer entering or leaving the system.

11

10

Q. Could Spire's method result in a correctly calculated WNAR?

12 13

achieved if there was either no change in the rank (i.e. the 2016 rank is the exact same as the

The correct adjustment would only be

14

2018 rank, as shown in the attached worksheet Schedule MLS-d4) or if there was no change

15

16

Q. Does this conclude your testimony?

Potentially, but highly unlikely.

17

A. Yes it does.

in customer counts for all bill cycles.

A.

## BEFORE THE PUBLIC SERVICE COMMISSION

## OF THE STATE OF MISSOURI

In the Matter of Spire Missouri, Inc. d/b/a Spire's Request to Decrease WNAR	)	Case No. GO-2019-0058
		and
In the Matter of Spire Missouri, Inc.'s d/b/a Spire's Request to Increase Its WNAR	)	Case No. GO-2019-0059
AFFIDAVIT OF MI	CHAEL	L. STAHLMAN
STATE OF MISSOURI )		
COUNTY OF COLE ) ss.		
COMES NOW MICHAEL L. STAHLN	MAN and	d on his oath declares that he is of sound
mind and lawful age; that he contributed to the	e foregoi	ing Direct Testimony; and that the same is
true and correct according to his best knowleds	ge and be	elief.
Further the Affiant sayeth not.		

## **JURAT**

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number; 12412070

Notary Public

MICHAEL L. STAHLMAN

## Michael L. Stahlman

#### Education

2009	M. S., Agricultural Economics, University of Missouri, Columbia, MO.
2007	B.A., Economics, Summa Cum Laude, Westminster College, Fulton, MO.

## **Professional Experience**

2010	Regulatory Economist, Missouri Public Service Commission
2007 - 2009	Graduate Research Assistant, University of Missouri
2008	Graduate Teaching Assistant, University of Missouri
2007	American Institute for Economic Research (AIER) Summer
	Fellowship Program
2006	Price Analysis Intern, Food and Agricultural Policy Research Institute
	(FAPRI), Columbia, MO
2006	Legislative Intern for State Representative Munzlinger
2005 - 2006	Certified Tutor in Macroeconomics, Westminster College, Fulton, MO
1998 - 2004	Engineering Watch Supervisor, United States Navy

## **Expert Witness Testimony**

#### Union Electric Company d/b/a AmerenUE

GR-2010-0363

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Natural Gas Service Provided to Customers in the Company's Missouri Service Area

## Union Electric Company d/b/a Ameren Missouri

GT-2011-0410

In the Matter of the Union Electric Company's (d/b/a Ameren Missouri) Gas Service Tariffs Removing Certain Provisions for Rebates from Its Missouri Energy Efficient Natural Gas Equipment and Building Shell Measure Rebate Program

#### KCP&L Great Missouri Operations Company

EO-2012-0009

In the Matter of KCP&L Greater Missouri Operations Company's Notice of Intent to File an Application for Authority to Establish a Demand-Side Programs Investment Mechanism

#### Union Electric Company d/b/a Ameren Missouri

EO-2012-0142

In the Matter of Union Electric Company d/b/a Ameren Missouri's Filing to Implement Regulatory Changes Furtherance of Energy Efficiency as Allowed by MEEIA

## Kansas City Power & Light Company

EO-2012-0323

In the Matter of the Resource Plan of Kansas City Power & Light Company

#### KCP&L Great Missouri Operations Company

EO-2012-0324

In the Matter of the Resource Plan of KCP&L Greater Missouri Operations Company

#### cont'd Michael L. Stahlman

Kansas City Power & Light Company

EO-2012-0135

KCP&L Great Missouri Operations Company

EO-2012-0136

In the Matter of the Application of Kansas City Power & Light Company [KCP&L Great Missouri Operations Company] for Authority to Extend the Transfer of Functional Control of Certain Transmission Assets to the Southwest Power Pool, Inc.

Kansas City Power & Light Company, KCP&L Great Missouri

EA-2013-0098

Operations Company, and Transource Missouri

EO-2012-0367

In the Matter of the Application of Transource Missouri, LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Finance, Own, Operate, and Maintain the Iatan-Nashua and Sibley-Nebraska City Electric Transmission Projects

Kansas City Power & Light Company

EU-2014-0077

KCP&L Great Missouri Operations Company

In the Matter of the Application of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company for the Issuance of an Accounting Authority Order relating to their Electrical Operations and for a Contingent Waiver of the Notice Requirement of 4 CSR 240-4.020(2)

Kansas City Power & Light Company

EO-2014-0095

In the Matter of Kansas City Power & Light Company's Notice of Intent to File an Application for Authority To Establish a Demand-Side Programs Investment Mechanism

Veolia Energy Kansas City, Inc

HR-2014-0066

In the Matter of Veolia Energy Kansas City, Inc for Authority to File Tariffs to Increase Rates

Grain Belt Express Clean Line, LLC

EA-2014-0207

In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line

Union Electric Company d/b/a Ameren Missouri

ER-2014-0258

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service

Empire District Electric Company

ER-2014-0351

In the Matter of The Empire District Electric Company for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area

Kansas City Power & Light Company

ER-2014-0370

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service

#### cont'd Michael L. Stahlman

Kansas City Power & Light Company

EO-2014-0240

In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism

KCP&L Great Missouri Operations Company

EO-2014-0241

In the Matter of KCP&L Greater Missouri Operations Company's Filing for Approval of Demand-Side Programs and for Authority to Establish a Demand-Side Programs Investment Mechanism

Ameren Transmission Company of Illinois

EA-2015-0146

In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri to the Iowa Border and an Associated Substation Near Kirksville, Missouri

**Empire District Electric Company** 

ER-2016-0023

In the Matter of The Empire District Electric Company's Request for Authority to Implement a General Rate Increase for Electric Service

KCP&L Great Missouri Operations Company

ER-2016-0156

In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service

Kansas City Power & Light Company

ER-2016-0285

In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service

Union Electric Company d/b/a Ameren Missouri

ER-2016-0179

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase Its Revenues for Electric Service

Grain Belt Express Clean Line, LLC

EA-2016-0358

In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing it to Construct, Own, Operate, Control, Manage and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood-Montgomery 345kV transmission line.

Spire Missouri, Inc.

GR-2017-0215 and GR-2017-0216

In the Matter of Spire Missouri, Inc.'s Request to Increase Its Revenues for Gas Service

#### cont'd Michael L. Stahlman

## **Selected Manuscripts and Posters**

- Stahlman, Michael and Laura M.J. McCann. "Technology Characteristics, Choice Architecture and Farmer Knowledge: The Case of Phytase." Agriculture and Human Values (2012) 29: 371-379.
- Stahlman, Michael. "The Amorality of Signals." Awarded in top 50 authors for SEVEN Fund essay competition, "The Morality of Profit."
- Stahlman, Michael, Laura M.J. McCann, and Haluk Gedikoglou. "Adoption of Phytase by Livestock Farmers." Selected poster at the American Agricultural Economics Association Annual Meeting, Orlando, FL, July 27-29, 2008. Also presented at the USDA/CSREES Annual Meeting in St. Louis, MO in February 2009.
- McCann, Laura, Haluk Gedikoglu, Bob Broz, John Lory, Ray Massey, and Michael Stahlman. "Farm Size and Adoption of BMPs by AFOs." Selected poster at the 5<sup>th</sup> National Small Farm Conference in Springfield, IL in September 2009.

			N	ORM_WX	2016 Rank	Hypotheical Actual HDD	Rank	Hypothetical NDD-ADD, Company Method	<u>Staff</u> <u>Recanked</u> Normal	Hypothetical NDD-ADD, Stoff Method
201611	2016	11	1	D.82	2	39.56	30	(38.75)	39,58	-
201611	2016	11	2	0.00	1	34.21	29	(34.21)	34.21	
201611	2016	11	3	5.24	4	31.84	28	(26.61)	31.84	-
201611	2016	11	4	8.24	6	30.21	27	(21.97)	30.21	
201611	2016	11		14.00	11	28.82	26	(14.82)	28.82	-
201611	2016	11	6	15.74	13	27.51	25	(11.77)	27.51	-
201611	2016	11	7	7.01	5	26.25	24	(19.24)	26.25	-
201611	2016	11	8	11.68	9	25.29	23	(13.61)	25,29	-
201611	2016	1.1	9	19.25	17	24.30	22	(5.05)	24.30	-
201611	2016	11	10	18.51	15	23.37	21	(4,86)	23.37	-
201611	2016	11	11	14.96	12	22.25	20	(7.29)	22.25	-
201611	2016	11 11	12	23.37	21 20	21.16	19	2.22	21.16	-
201611	2016	11	14	12.86	10	20.15 19.25	18 17	2.10	20.15	-
201611	2016	11	15	17.62	15	19.25	16	(6.40)	19.25	-
201611	2016	11	16	9.57	7	17.82	15	(0.69) (8.26)	18.51	-
201611	2016	11	17	3.13	3	16,76	14	(13.63)	17.82 16.76	-
201611	2016	11	18	10.86	8	15.74	13	(4.88)	15.74	= -
201611	2016	. 11	19	30.21	27	14.96	12	15.25	14.96	-
201611	2016	11	20	39.58	30	14.00	11	25,58	14.00	
201611	2016	11	21	34.21	29	12.86	10	21.35	12.86	-
201611	2016	- 11	22	25.29	23	11.68	9	13.61	11.68	
201611	2016	11	23	20.15	18	10.86	8	9.29	10.86	-
201611	2016	11	24	28.82	26	9.57	7	19.25	9.57	
201611	2016 2016	11 11	25 26	27.51 26.25	25 24	8.24	5	19.27	8.24	-
201611	2016	11	27	24.30	22	7,01 5,24	5 4	19.24 19.07	7.01	-
201611	2016		26	21.16	19	3.13	3	19.07	5.24 3.13	-
201611	2016	11	29	16.76	14	0.82	2	15.95	0.82	-
201611	2016	11	30	31.84	28	-	1	31.84	-	_
201612	2016	12	1	27.46	15	5.82	1	21.64	5,82	-
301973	2016	1.1	2	26.82	14	11.87	2	14,95	11.87	-
201612	2016	12	3.	29.80	18	14.42	3	15.37	14.42	
201612	2016	1.3	4	26.23	13	16.51	4	9.72	16.51	-
201612	2016 2016	12 12	5 6	25.55 29.02	12 17	18.23 19.60	5 6	7.32	18.23	=
201612	2016	19	7	31.75	20	20.95	7	9.42 10.80	19.60 20.95	-
201612	2016	12	ø	38.37	25	22.19	8	16.17	20,95	•
201612	2016	12	9	39.75	27	22.89	9	16.86	22.89	-
201612	2016	12	10	32.62	21	23.90	10	8,92	23.90	-
201612	2016	12	11	16.23	5	24.BS	11	(6.62)	24.85	-
201612	2016	12	12	30.69	19	25.55	12	5.14	25,55	-
201612	2016 2016	12 12	13 14	34.62	23 28	26.23	13	8.39	26.23	=
201612	2016	12	15	41.55	28 29	26,82 27.46	14 15	14.73 17.44	26.82 27.46	•
201612	2016	12	16	36.80	25	28,15	16	8.65	27.46 28.15	•
201612	2016	12	1.7	35.72	24	29.02	17	5.69	29.02	-
201612	2016	112	16	56.30	31	29.80	18	26.50	29.80	-
201612	2016	<b>0 12</b>	19	49.02	30	30,69	19	18.33	30.69	-
201612	2016	13	20	33.72	22	31.75	20	1.97	31.75	-
201612	2016 2016	12 12	21	20.15	16	32.82	21	(4,67)	32.82	=
201612	2016	12 12	22	22.69 24.85	9 11	33.72 34.62	22 23	(10.83)	33.72	-
201612	2016	12	24	16.51	4	34.62	23	(9.77) (19.21)	34,62 35.72	-
201612	2016	12	25	11.87	2	36.80		(24.94)	35.80	
201612	2016	12	26	5.82	1	38,37	26	(32.55)	38.37	
201612	2016	12	27	22.19	8	39.75	27	(17.56)	39.75	
201612	2016	12	28	20.95	7	41.55	28	(20.50)	41,55	-
201612	2016	12	29	14.42	3	44.90		(30,48)	44.90	-
201612	2016	12	30	23.90	10	49.02		(25.12)	49.02	-
201612	2016	12	31	19.60	6	56,30	31	(36.70)	56.30	-
		Su	m =	1441.65	Sum =	1441.6	5	0.00	1441.65	0.00

	33330	21/2012X	\$2500 W.		
YCLE	NOV		DEC		
	2016	39-7-53/99595	2016	1	
	252001818.	80000000000V	6789X86398	Company	Staff
	Market St.	265		Method	Method
1	I+Nov	30	I-Dec	] -	-
2	2-Nov	2003 <b>0</b> 000.	2-Dec	60.40	-
3	3-Nov	32	5-Dec	134,66	-
4	4-Nov	32	6-Dec	168.59	-
5	7-Nov	30	7-Dec	226.57	
6	8-Nov	30	8-Dec	256.62	_
7	9-Nov:	30	9-Dec	286.40	-
8	10-Nav	32	12-Dec	310.60	-
9	11-Nov	32	13-Dec	320.60	-
10	15-Nov	30	15-Dec	353.09	-
11	16 No.	30	16-Dec	371.22	_
12	17-Nov	32	19-Dec	421.33	_
13	18-Nov	32	20-Dec	453.29	-
14	21-Nov	30	21-1)cc	41.9.30	-
15	22-No:	30	22-Dec	393.27	-
16	23-Nov	34	27-Dec	282.38	_
17	28-Nov	30	28-Dec	178.70	-
18	29+Nov	30	29-Dec	140.08	

Sum = 4,777.09

\* Using the rank method discussed in Staff's testimony and the

								II sk - st- sk tribb	61-E	cal NDD
				vosnímx	2016 Bark	Hapotheical Actual HCO	Azek	Hypotherical NOD ADD, Company Method	Staff Parasked Natural	Pethod
361514 231516	2016 2016	10 10	1 2	2.65	12 13	2.69 3.74	12 13	•	2.69 3.74	
211510	2416	10	999	1,62	10	1.00	10	-	1.00	
201610	2516 2116	20 S	# £	0.00	1		1	•	-	-
201618	2115		\$	6.00	1		1		:	
211616	3116	10	Ang Air	11.33	33	11.33	21	-	11.33	-
251618	2115 2116	1. 1.	•	13.11	24 13	13.11 7.92	24 38		13.31 7.92	:
201614	2116			7.09	17	7.09	17		7.09	-
241414	2914	10	11	0.15	9	0:15	9	-	0.15	-
261616	3014)	10	312	6.26 23.51	35 30	6.26 20.51	15 33	*	6.26 20.51	
201610	2414	14	34	12.28	23	25.58	23	-	12.25	-
261516	2416	•	1	8.60	1	•	1	•	•	-
201618	2016 2016	10 10	16 17	0.49	1	-	1		-	-
201610	2616	10	11	0.00	1	•	3	•		-
201610	2116 2114	10 10	29	1.17 16-72	19 27	8.77 16.22	19 27	•	# <i>37</i> 16.22	-
201618	3416	11	21	24.10	31	24_10	31		24 10	÷
201614	2016 2016	16	22 23	11.52	23	35.52 1.78	29 11	:	16.52 1.78	•
211610	2016	10	21	15.11	11 26	15.11	16		15.11	
211510	2916	10	25	14.13	25	26.13	25		14.13	-
211610	2016 2516	18 19	26 27	10.36	21 28	10.35 17.17	21 28	•	17.17	-
211516	2016	14	21	5.45	15	5.45	15	•	5.45	-
201610	2616 2816	16 16	23 32	6.65	1 14		1	•	4.53	-
301610	2116	18	31	9.59	20	9.50	20	•	9.50	-
201611	2516 2516	11 11	2	0.47	1	3958 34.21	30 29	35.76 34.21	39.58 34.25	
201611	2516	21		5.24	4	3124	28	26.61	31.84	
211611	2916	11	e i	4.21	6	33.21	27	21 97	30.21	-
261621 261621	2016 2016	11 11		14.00 15.74	11 13	28.82 27.51	26 25	14.81 11.77	28.82 27.51	-
241611	2316	11	7	7.01	5	26.25	24	13.24	26.25	-
241611	2016 2616	11 14		11.68 33.25	9 17	25.29 24.30	23	13.61 5.66	25.23 24.33	-
201611	2816	11	10	18.51	16	23.37	21	4.25	23.37	
201611	2016 2016	21 21	11 22	14.96 23.37	12 25	22.25 21.16	20 19	7.29 (7.21)	22.25 21.16	-
201631	2814	11	1.3	22.25	50	3072	1.5	(2.3.3)	23.15	
201611	3116 2316	11 11	24 15	12.46 17.42	10 15	19.25 18.51	17 16	6.43 0.69	19.25 16.51	٠
211611	3916	11 11	16	9-57	7	17.17	15	1.25	17.82	-
241611	2016	11	17	3.33	3	15.76	10 13	13.63 4.81	16.76	-
281611	2016	11 11	14 15	10.26 30.21	27	15.74 14. <del>9</del> 5	12	(15.25)	15.74 14.56	-
201612	2316	31	21	33.51	33	14.00	31	(25.51)	14.00	-
261611	2316	11 11	21 22	34.21	29 23	12.85 11.68	10 9	(21.95) (19.61)	12.65 11.68	-
281611	2516	11	23	25.15	18	10.05	8	(9.25)	10.86	•
241611	2816	11	24	28.82	25 25	9.57 8.24	7 6	(13-25) (19-27)	9.57 8.24	-
201611	2916	11	25	26.25	24	7.01	5	(19.24)	7.01	-
201611	2916	11 11	27 78	24.35	22 13	5.24 3.13	4	(19.07) (18.01)	\$.24 3.33	-
261611	2016	11	29	16.76	14	0.82	2	(15.55)	0.82	-
201612	2116	11 12	3.0	31.84	28 15	27.46	1 15	(31 24)	27.45	-
201612	2514	12	1	26.62	14	26.82	15	-	26.82	-
291612	2516	32	•	73.13	18 13	29.63 26.23	18	*	23.£5 26.23	-
201612	2616 2516	11 12	- 11.0 <b>•</b> - 11.0 <b>•</b>	26.23 25.55	12	25.55	12	:	25.55	-
201612	2516	12	•	29.62	17	23-02	17	-	23.02	-
211612	2016			31.75	20 25	31.75 31.37	20 25	•	31.75 31.37	
241612	2016	12	•	39.75	27	33.75	27		39.75	
201612	2816 2816	12 12	10 11	32.62 18.23	21 5	32.82 38.23	21 5	-	37.47 15.23	-
261612	2316	27	32	32.65	19	33.69	19		33.69	-
201612	2416	33	13	34.62	23	34.62 41.55	23	•	34 62 41 55	-
201612	2216 2916	11 12	14 15	41.55	28 29	44.50	28 23	•	41.50	-
291612	2616	33	36	35.19	25	35.1/3	25	•	35.80	-
291612	2616	13 13	37 34	39.72 56.30	24 31	35 72 55 30	24 31	•	35.72 56.30	-
211612	2116	12	19	45.62	30	49.02	3.0	•	49.02	-
291512	2416	12 12	28 21	31.72	22 16	33.72 28.15	22 16	-	33.72 21.15	:
211612	2216	11	21	22.69	9	22.89	9	•	22.53	-
201612	2016	12 12	23	24.ES 16.51	11 4	24£5 16.51	11 4	•	24 85 36.51	•
201612	2016	12	24 35	16.51	2	1651 11.87	2	•	35.51 31.87	-
201612	2016	12	26	5.12	1	5.82	1	•	5.62 22.19	-
201612	2016 2016	12	27 21	22.19	8 7	22.19 20.55	7	•	22.19 20.55	-
291612	2816	12	29	14.42	3	14.42	3		14.02	•
201612	2016	12 12	34 31	23.53	)±3 6	23.50 19.60	10 6	-	23.93 13.60	
							•			

300				16.26	ł	
March		WELCH.	1,458		1	
	320				Сепрану	
OCT		ינטה	0.60%	DEC	Vettod	
2016	20%000000	29/6	anienesti.	2016	06.100	
150000	495-500 AC	100000	J4060000	2669860	No Cycle	Day Cords
3-0-1	29	LNov	10 <b>20</b> /	1-Dec	*****	Decepor
101	29	3-Nov	× 30	2Dec	38.76	(35.76)
SOM	29	3-Nov	\$ 32 A	J Dec	72.93	(72.53)
601	29	4Nov	W/32/6	6 Dar	99.58	(12.66)
70.1	※31 //	1-Nov	30	7-Dec	143 15	(148 15)
1004	29	& Nov	30	1 De	157.33	(167.35)
13-Oct	26.28 (2)	9.No-	<b>张39</b> 公	≯D≖	181.00	[111.00]
13 Oct	25	10,500	20 M	12 Dec	185.05	(185.05)
1404	# <b>33</b> (4)	II-Nor	<b>#32</b> #	11-Dec	190.50	(150.50)
17-Oct	₩ <b>29</b> @	17-1,04	39	15-Dec	300.27	(200.27)
1804	29	16300	30	16 Dec	200.56	(200.55)
19 Oct	/29	11-Nor	832 W	19-Dec	209 22	(209-22)
1103	4 28 III	IbNor	37	20 Dec	222.85	(222.15)
140a	10 <b>25</b> 12	21-Nor	9/ <b>30</b> (%)	21-Dec	115.63	(115.13)
75-Oct	28	22.Vev	84 <b>30</b> 997	22-Dec	165.54	(165.54)
26 Oct	28	21 Nev	#34 W	77 Dec	151. <del>5</del> 3	(151.53)
27-0-1	32	23-Nov	30	23-Dec	65-81	(65.81)
18-Oct	32	24Nov	39	27-Dec	47.79	(47.73)

2,536.05 (2,536.05)

				NORM, W.	2016 Rank	<u>Hypotheical</u> <u>Actual HDD</u> Ra	anh	Hypothetical NDD-ADD, Company Method	Staff Reranked Normal	Hypothetical NDD-ADD, Staff Method	<u>Difference</u> <u>Between</u> <u>Company</u> and Staff
201611	2016	11	1	0.82	2	0.90	2	(0.08)	0.82	(80.0)	<u> </u>
201611	2016	11	2	0.00	1	-	1		-	-	-
201611	2016	11	3	5.24	4	5.76	4	(0.52)	5.24	(0.52)	
201611	2016	11		8.24	6	9.06	6	(0.82)	8.24	(0.82)	
2016113	2016	11	5 6	14.00	11	15.40	11	(1.40)	14.00	(1.40)	-
201611	2016	11		15.74	13	17.31	13	(1.57)	15.74	(1.57)	-
201611	2016	11 .	6 J	7.01	5	7.72	5	(0.70)	7.01	(0.70)	•
201611	2016	11	8	11.68	9	12.85	9	(1.17)	11.58	(1.17)	-
201611	2016	11	9	19,25	17	21.18	17	(1.93)	19.25	(1.93)	-
201611	2016 2016	11	10	18.51	16 12	20.36 16.46	16 12	(1.85)	18.51 14.96	(1.85) (1.50)	-
201611	2016 2016	11 11	11 12	14.95 23.37	21	25.71	21	(1.50) (2.34)	23.37	(2.34)	-
201611	2016	11	13	22.25	20	24.47	20	(2.22)	22.25	(2.22)	
201611	2016	11	14	12.86	10	14.14	10	(1.29)	12.85	(1.29)	_
201611	2016	11	15	17.82	15	19.61	15	(1.78)	17.82	(1.78)	-
201611	2016	11	16	9.57	7	10.53	7	(0.96)	9.57	(0.96)	-
201611	2016	11	17	3.13	3	3.45	3	{0.31}	3.13	(0.31)	+
201611	2016	11	18	10.86	8	11.95	8	(1.09)	10,86	(1.09)	-
201611	2016	11	19	30.21	27	33.23	27	{3.02}	30.21	(3.02)	-
201611	2016	11	20	39.58	30	43.54	30	(3.96)	39.58	(3.96)	-
201611	2016	11	21	34.21	29	37.63	29	(3.42)	34.21 25.29	(3.42) (2.53)	-
201611	2016 2016	11 11	22 23	25.29 20.15	23 18	27.82 22.16	23 18	(2.53) (2.01)	20.15	(2.53)	-
201611	2016	11 11	23 24	28.82	26	31.70	26	(2.88)	28.82	(2.88)	-
201611	2016	11	25	27.51	25	30.26	25	(2.75)	27.51	(2.75)	-
201611	2016	11	26	26.25	24	28.88	24	{2.63}	26.25	(2.63)	-
201611	2016	11	27	24.30	22	26.73	22	(2.43)	24.30	{2.43}	-
201611	2016	11	28	21.16	19	23.27	19	{2.12}	21.16	(2.12)	•
201611	2016	11	29	16,76	14	18.44	14	(1.68)	16.76	(1.68)	-
201611	2016	11	30	31.84	28	35.02	28	(3.18)	31.84	(3.18)	-
201612	2016	12	1	27.46	15	30.20	15	(2.75)	27.46	(2.75)	-
201612	2016	12	2.4.3	26.82	14	29.50	14	(2.68)	26.82	(2.68)	-
201612	2016	12	3	29.80	18	32.78	18	(2.98)	29.80	(2.98)	•
201612	2016	12	4	26.23	13	28.85 28.10	13 12	(2.62) {2.55}	26.23 25.55	(2.62) (2.55)	-
201612	2016 2016	12 12	5 6	25.55 29.02	12 17	31.93	17	(2.90)	29.02	(2.90)	
201612	2016	12	7	31.75	20	34.93	20	(3.18)	31.75	(3.18)	-
201612	2016	12	8	38.37	26	42.21	26	(3.84)	38,37	(3.84)	
201612	2016	12	9	39.75	27	43.73	27	(3.98)	39.75	(3.98)	-
201612	2016	12	10	32.82	21	36.10	21	(3.28)	32.82	(3.28)	-
201612	2016	12	11	18.23	S	20.05	5	(1.82)	18.23	(1.82)	•
201612	2016	12	12	30.69	19	33.76	19	(3.07)	30.69	(3.07)	-
201612	2016	12	13	34,62	23	38.08	23	(3.46)	34.62	(3.46)	-
201612	2016	12	14	41.55	28	45.71	28	(4.16)	41.55	(4.16)	-
201612	2016	12	15	44.90	29 25	49.39 40.48	29 25	(4.49) (3.68)	44.90 36.80	(4.49) (3.68)	-
201612	2016 2016	12 12	16 17	36.80 35.72	24	39,29	24	(3.57)	35.72	(3.57)	
201612	2016	12	18	56.30	31	61,93	31	(5.63)	56.30	(5,63)	-
201612	2016	12	19	49.02	30	53.92	30	(4.90)	49.02	(4.90)	-
201612	2016	12	20	33.72	22	37.09	22	(3.37)	33.72	(3.37)	-
201612	2016	12	21	28.15	16	30.96	16	(2.81)	28.15	(2.81)	-
201612	2016	12	22	22.89	9	25.18	9	(2.29)	22.89	(2.29)	-
201612	2016	12	23	24.85	11	27.34	11	(2.49)	24.85	(2.49)	•
201612	2016	12	24	16.51	4	18.16	4	(1.65)	16.51	(1.65)	-
201612	2016	12	25	11.87	2	13.05	2	(1.19)	11.87	(1.19)	=
201612	2016	12	26	5.82	1	6.40	1	(0.58)	5.82	(0.58)	-
201612	2016	12	27	22,19 20.95	8 7	24.41 23.04	8 7	(2.22) (2.09)	22.19 20.95	(2.22) (2.09)	•
201612	2016 2016	12 12	28 29	14.42	3	23.04 15.87	3	(2.09)	14.42	(2.03)	-
201613	2016	12	30	23.90	10	26.29	10	(2.39)	23.90	(2.39)	
201612	2016	12	31	19.60	6	21.56	6	(1.96)	19.60	(1.96)	-
		Sun		1441.65	\$um =	1585.82		-144.17	1441.65	-144.17	