

Exhibit No.:
Issues: Revenue Requirement
Witness: Michelle Bocklage
Sponsoring Party: MO PSC Staff
Type of Exhibit: Surrebuttal Testimony
Case No.: GR-2014-0086
Date Testimony Prepared: August 8, 2014

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION
Tariff, Safety, Economic & Engineering Analysis

SURREBUTTAL TESTIMONY

OF

MICHELLE BOCKLAGE

SUMMIT NATURAL GAS OF MISSOURI, INC.

CASE NO. GR-2014-0086

Jefferson City, Missouri
August 2014

Staff Exhibit No. 122
Date 8-19-14 Reporter KF
File No. GR-2014-0086

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**


In the Matter of Summit Natural Gas of)
Missouri Inc.'s Filing of Revised Tariffs)
To Increase its Annual Revenues For)
Natural Gas Service)

Case No.: GR-2014-0086

AFFIDAVIT OF MICHELLE BOCKLAGE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Michelle Bocklage, of lawful age, on her oath states: that she has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 3 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.



Michelle Bocklage

Subscribed and sworn to before me this 7th day of August, 2014.

LAURA BLOCH
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 21, 2015
Commission Number: 11203914



Notary Public

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OF
MICHELLE BOCKLAGE
SUMMIT NATURAL GAS OF MISSOURI, INC.
CASE NO. GR-2014-0086

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2 **OF**

3 **MICHELLE BOCKLAGE**

4 **SUMMIT NATURAL GAS OF MISSOURI, INC.**

5 **CASE NO. GR-2014-0086**

6 Q. Please state your name and business address.

7 A. My name is Michelle Bocklage and my business address is Missouri Public
8 Service Commission, P. O. Box 360, Jefferson City, Missouri 65102.

9 Q. Who is your employer and what is your present position?

10 A. I am employed by the Missouri Public Service Commission (“Commission”)
11 and my title is Rate & Tariff Examiner III, Tariff/Rate Design Section, Energy Unit, Utility
12 Operations, Regulatory Review Division.

13 Q. Are you the same Michelle Bocklage that filed rebuttal testimony in this case
14 on July 11, 2014?

15 A. Yes.

16 **EXECUTIVE SUMMARY**

17 Q. What is the purpose of your surrebuttal testimony?

18 A. The purpose of this testimony is to address the rebuttal testimony of Summit
19 Natural Gas of Missouri, Inc. (“SNG” or “Company”) witness Tyson Porter regarding the
20 weather normalizations performed by Staff.

21 Q. Does Staff agree with Mr. Porter’s summary of what he refers to as errors
22 made by Staff concerning the Weather Normalized Average Usage Per Customer?

23 A. No. On page 4 of Mr. Porter’s testimony he stated, “Staff uses heating value
24 for some customer classes and volume measurement for others.” Staff is unsure what Mr.

1 Porter is referencing in regard to Staff's use of "heating value" in the weather normalization
2 calculations.

3 The files that Staff utilized for customer count and usage are the Branson-Rogersville
4 Retail Demand, Gallatin-Warsaw Retail Demand, and Missouri Consumption Report provided
5 by SNG in its original response to DR 0001 and DR 0097. The Branson-Rogersville Retail
6 Demand and the Gallatin-Warsaw Retail Demand files provided by SNG do not match the
7 customer usage that SNG also provided in the Missouri Consumption Report¹ for General
8 Service ("GS"), Commercial Service ("CS"), Optional General Service ("OGS") and Large
9 General Service ("LGS") for the test year ending September 30, 2013. Due to the
10 inconsistency in customer usages between the Branson-Rogersville Retail Demand or
11 Gallatin-Warsaw Retail Demand files and the Missouri Consumption Report file provided by
12 SNG, Staff's customer usages were off for the GS, OGS, and LGS classes in the Branson
13 segment of the weather normalization spreadsheet. After Staff's direct filing, Mr. Porter
14 requested that Staff revise the data and Staff agreed to make the revisions for consistency.
15 Staff was satisfied after further review that its revisions were consistent.

16 With regard to Mr. Porter's rebuttal testimony concerning "errors" regarding the test
17 year data totals, SNG had only provided Staff with eleven months of data to calculate its test
18 year totals. Later, Staff received twelve full months of data. Staff then entered the twelve
19 months of data and modified Staff's formulas. However, not all of the changes reflected a full
20 twelve months data so some of the initial calculations performed were still based on eleven
21 months of data. Upon discovery of this issue, Staff made the necessary corrections to reflect a
22 full twelve months of data in its calculations.

¹ SNG provided this report of its total Ccf consumption by month for each of its service areas in response to Staff data request 0097.

1 Q. Does Staff agree with the “Avg Usage From Staff” that Mr. Porter provided in
2 “Rebuttal Schedule TDP-2 Updated Weather Normalization Average Usages as of 12-31-
3 2014”?

4 A. No. Mr. Porter’s testimony is unclear. Mr. Porter filed “Rebuttal Schedule
5 TDP-2, Updated Weather Normalization Average Usages as of 12-31-2014” including a
6 column titled “Avg Usage From Staff” with a footnote indicating that those values were
7 provided by Staff in “Bocklage – Summit Weather Normalization Spreadsheet updated Bases
8 Sales.” However, the values in the “Avg Usage from Staff” volume do not match the values
9 Staff provided in “Bocklage—Summit Weather Normalization Spreadsheet updated Bases
10 Sales.” Mr. Porter is unclear in his testimony. On page 4 of Mr. Porter’s rebuttal testimony
11 he stated that SNG made corrections to Staff’s workpaper to come up with the values in
12 Rebuttal Schedule TDP-2. In response to the issues raised in Mr. Porter’s rebuttal testimony,
13 Staff also modified its workpaper. However, Staff’s modifications do not match what Mr.
14 Porter alleges that Staff provided as “Avg Usage From Staff” in his Rebuttal Schedule TDP-2.
15 Staff is unclear how Mr. Porter derived the values listed in the column “Avg Usage From
16 Staff.” Included as Surrebuttal, Schedule MB-1 reflects Staff’s updated Normalized Sales Per
17 Customer.

18 Q. Does this conclude your surrebuttal testimony?

19 A. Yes, it does.

DISTRICT: BRANSON

CLASS: GS - Residential

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	4,180	-3,975	205	350	0.5867
Nov	11,332	1,354	12,686	354	35.7994
Dec	17,460	7,286	24,746	363	68.2231
Jan	44,804	4,546	49,350	365	135.0911
Feb	41,100	-968	40,132	369	108.6615
Mar	39,911	-5,843	34,068	372	91.6599
Apr	27,090	-1,784	25,306	371	68.1476
May	17,281	-1,911	15,370	373	41.2609
Jun	5,495	-241	5,254	368	14.2666
Jul	3,748	39	3,787	358	10.5774
Aug	2,958	77	3,035	352	8.6210
Sep	3,449	1,494	4,943	351	14.0839
	218,808	75	218,883	4,347	50.3568
		0.03%			

DISTRICT: BRANSON

CLASS: GS - Residential Optional

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	655	-590	65	93	0.6962
Nov	2,068	203	2,271	95	23.8165
Dec	3,244	1,064	4,308	95	45.2280
Jan	6,237	667	6,904	96	71.5928
Feb	5,585	-145	5,440	100	54.6177
Mar	7,314	-877	6,437	100	64.1662
Apr	3,782	-292	3,490	109	31.8956
May	2,098	-323	1,775	113	15.6985
Jun	568	-41	527	112	4.7073
Jul	470	7	477	107	4.4433
Aug	496	13	509	111	4.5961
Sep	517	267	784	113	6.9422
	33,034	-47	32,987	1,246	26.4748
		-0.14%			

DISTRICT: BRANSON

CLASS: GS - Commercial (Sm. Commercial)

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	28,235	-2,546	25,689	158	162.7331
Nov	37,815	854	38,669	157	245.9173
Dec	40,973	4,523	45,496	158	287.0726
Jan	57,423	2,931	60,354	166	364.1257
Feb	46,150	-633	45,517	170	267.5884
Mar	53,134	-3,802	49,332	170	289.8240
Apr	44,602	-1,150	43,452	168	257.9568
May	38,310	-1,241	37,069	170	217.6907
Jun	32,821	-158	32,663	170	192.4276
Jul	30,850	27	30,877	172	179.4078
Aug	34,710	54	34,764	173	200.5482
Sep	31,130	1,047	32,177	173	185.9914
	476,153	-96	476,057	2,007	237.2498
		-0.02%			

DISTRICT: BRANSON

CLASS: GS - Commercial Optional
(Small Commercial)

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	298	-220	78	17	4.4636
Nov	627	77	704	18	39.0972
Dec	1,207	410	1,617	18	88.3349
Jan	2,824	270	3,094	19	159.1743
Feb	2,875	-62	2,813	21	132.2643
Mar	2,972	-403	2,569	23	111.8755
Apr	2,439	-150	2,289	28	81.7468
May	1,650	-186	1,464	33	44.9460
Jun	816	-25	791	34	23.3147
Jul	764	4	768	34	22.5469
Aug	845	8	853	33	25.8740
Sep	554	157	711	33	21.5391
	17,871	-121	17,750	312	56.9091
		-0.67%			

DISTRICT: BRANSON

CLASS : CS/LGS

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	96,636	-4,736	91,900	114	808.9266
Nov	120,964	1,599	122,563	114	1075.1177
Dec	121,356	8,558	129,914	116	1119.6189
Jan	125,825	5,392	131,217	118	1112.0111
Feb	94,856	-1,101	93,755	114	819.2988
Mar	106,383	-6,358	100,025	110	908.1406
Apr	114,665	-1,966	112,699	111	1011.2253
May	108,164	-2,067	106,097	110	966.9895
Jun	106,069	-270	105,799	112	942.4624
Jul	106,328	45	106,373	113	939.3509
Aug	125,164	91	125,255	114	1100.8424
Sep	110,120	1,813	111,933	116	964.9437
	1,336,530	1,003	1,337,533	1,363	981.5560
		0.08%			

DISTRICT: ROGERSVILLE

CLASS: GS - Residential

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	65,531	-52,271	13,260	4,577	2.8968
Nov	197,963	17,848	215,811	4,644	46.4693
Dec	283,862	96,061	379,923	4,755	79.9078
Jan	504,928	60,048	564,976	4,797	117.7769
Feb	495,930	-12,756	483,174	4,841	99.8176
Mar	525,511	-76,814	448,697	4,858	92.3631
Apr	397,138	-23,524	373,614	4,869	76.7351
May	214,730	-24,824	189,906	4,810	39.4813
Jun	89,627	-3,105	86,522	4,712	18.3602
Jul	42,085	508	42,593	4,622	9.2142
Aug	41,208	1,007	42,215	4,587	9.2030
Sep	47,345	19,652	66,997	4,589	14.5995
	2,905,858	1,830	2,907,688	56,662	51.3168
		0.06%			

DISTRICT: ROGERSVILLE

CLASS : GS - Residential Optional

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	44,613	-38,442	6,171	4,068	1.5170
Nov	139,890	13,134	153,024	4,130	37.0535
Dec	216,356	70,977	287,333	4,245	67.6854
Jan	375,984	45,101	421,085	4,354	96.7163
Feb	382,765	-9,724	373,041	4,459	83.6590
Mar	390,152	-58,832	331,320	4,496	73.6890
Apr	304,282	-18,096	286,186	4,526	63.2320
May	157,709	-19,099	138,610	4,472	30.9959
Jun	64,137	-2,391	61,746	4,385	14.0807
Jul	29,707	388	30,095	4,268	7.0518
Aug	28,584	770	29,354	4,237	6.9280
Sep	33,231	15,019	48,250	4,238	11.3850
	2,167,410	-1,195	2,166,215	51,878	41.7562
		-0.06%			

DISTRICT: ROGERSVILLE

CLASS: GS - Commercial (Sm. Commercial)

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	67,952	-32,070	35,882	1,055	33.9986
Nov	147,732	10,950	158,682	1,071	148.1911
Dec	203,141	58,915	262,056	1,096	239.1301
Jan	362,976	36,963	399,939	1,110	360.3965
Feb	338,376	-7,855	330,521	1,120	295.0586
Mar	388,055	-47,157	340,898	1,121	304.1530
Apr	275,021	-14,462	260,559	1,125	231.6265
May	156,244	-15,394	140,850	1,121	125.6508
Jun	83,209	-1,924	81,285	1,098	74.0533
Jul	59,838	313	60,151	1,070	56.2047
Aug	62,242	619	62,861	1,059	59.3624
Sep	62,807	11,999	74,806	1,053	71.0407
	2,207,593	897	2,208,490	13,098	168.6069
		0.04%			

DISTRICT: ROGERSVILLE

CLASS : GS - Commercial Optional

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	5,729	-4,393	1,336	298	4.4872
Nov	13,574	1,477	15,051	297	50.6162
Dec	23,882	8,019	31,901	307	103.8697
Jan	43,931	5,194	49,125	321	152.9941
Feb	47,139	-1,130	46,009	332	138.6996
Mar	50,699	-6,975	43,724	341	128.0932
Apr	39,439	-2,177	37,262	349	106.8953
May	18,423	-2,342	16,081	351	45.7886
Jun	8,272	-299	7,973	351	22.6864
Jul	6,218	50	6,268	350	17.8989
Aug	4,674	99	4,773	348	13.7058
Sep	5,246	1,970	7,216	356	20.2703
	267,226	-507	266,719	4,002	66.6475
		-0.19%			

DISTRICT: ROGERSVILLE

CLASS: LGS

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	73,331	-27,774	45,557	83	548.8784
Nov	145,512	9,705	155,217	86	1801.1502
Dec	207,200	52,615	259,815	89	2923.5036
Jan	274,115	33,861	307,976	92	3336.2279
Feb	280,942	-7,544	273,398	98	2798.7040
Mar	269,350	-46,072	223,278	99	2245.4061
Apr	191,538	-14,274	177,264	101	1758.1619
May	107,469	-15,508	91,961	103	896.7574
Jun	51,553	-2,004	49,549	104	477.4348
Jul	28,550	330	28,880	103	281.3331
Aug	35,530	632	36,162	98	368.2478
Sep	39,202	12,298	51,500	98	525.5058
	1,704,292	-3,736	1,700,556	1,153	1474.2644
		-0.22%			

DISTRICT: GALLATIN

CLASS: GS - Residential

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	24,922	-9,352	15,570	1,241	12.5455
Nov	76,245	13,429	89,674	1,267	70.7633
Dec	104,093	21,081	125,174	1,297	96.4797
Jan	167,495	19,066	186,561	1,317	141.7099
Feb	181,687	-4,677	177,010	1,324	133.6806
Mar	149,917	-30,546	119,371	1,324	90.1863
Apr	98,811	-20,700	78,111	1,322	59.0935
May	60,820	-9,008	51,812	1,319	39.2780
Jun	13,701	-1,520	12,181	1,291	9.4373
Jul	7,579	0	7,579	1,257	6.0294
Aug	7,874	292	8,166	1,240	6.5855
Sep	8,066	6,197	14,263	1,224	11.6528
	901,210	-15,738	885,472	15,423	57.4138
		-1.75%			

DISTRICT: GALLATIN

CLASS: GS - Commercial (Sm. Commercial)

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	5,657	-2,004	3,653	191	19.1613
Nov	13,546	2,803	16,349	190	86.2098
Dec	21,138	4,355	25,493	192	132.6811
Jan	37,232	3,886	41,118	192	213.7832
Feb	41,563	-955	40,608	194	209.4875
Mar	34,770	-6,276	28,494	195	146.1475
Apr	22,574	-4,266	18,308	195	93.7554
May	14,291	-1,864	12,427	196	63.5153
Jun	4,264	-317	3,947	193	20.4265
Jul	3,194	0	3,194	190	16.8105
Aug	3,432	62	3,494	189	18.4872
Sep	3,471	1,342	4,813	190	25.3311
	205,132	-3,235	201,897	2,307	87.5261
		-1.58%			

DISTRICT: GALLATIN

CLASS: CS

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	13,409	-4,239	9,170	51	181.4508
Nov	37,973	6,016	43,989	51	862.5337
Dec	41,263	9,225	50,488	51	989.9583
Jan	69,074	8,222	77,296	51	1515.6111
Feb	79,651	-2,005	77,646	51	1522.4626
Mar	63,260	-13,102	50,158	51	983.4904
Apr	45,364	-8,855	36,509	51	718.7872
May	26,749	-3,801	22,948	50	458.9580
Jun	6,538	-655	5,883	50	117.6528
Jul	4,278	0	4,278	50	85.5600
Aug	4,774	131	4,905	50	98.1014
Sep	8,580	2,818	11,398	50	227.9611
	400,913	-6,245	394,668	606	650.9137
		-1.56%			

DISTRICT: WARSAW

CLASS: GS - Residential

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	12,566	-5,295	7,271	774	9.3982
Nov	37,490	24	37,514	789	47.5496
Dec	47,327	10,427	57,754	801	72.1380
Jan	82,040	4,277	86,317	820	105.3240
Feb	82,933	-4,106	78,827	834	94.5340
Mar	74,666	-16,937	57,729	838	68.9002
Apr	46,915	-8,076	38,839	836	46.4789
May	29,198	-3,954	25,244	830	30.4278
Jun	7,744	-514	7,230	815	8.8737
Jul	4,894	87	4,981	800	6.2233
Aug	5,069	144	5,213	796	6.5509
Sep	5,106	2,275	7,381	799	9.2379
	435,948	-21,651	414,297	9,730	42.5812
		-4.97%			

DISTRICT: WARSAW

CLASS: GS - Commercial (Sm. Commercial)

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	6,563	-2,022	4,541	197	23.0507
Nov	16,124	9	16,133	198	81.3049
Dec	21,592	3,919	25,511	201	127.1514
Jan	36,604	1,581	38,185	202	188.9738
Feb	34,898	-1,486	33,412	201	166.0213
Mar	31,646	-6,151	25,495	203	125.6562
Apr	18,824	-2,933	15,891	202	78.5205
May	11,285	-1,447	9,838	202	48.6013
Jun	6,334	-187	6,146	198	31.0025
Jul	5,059	32	5,091	196	25.9834
Aug	4,914	53	4,967	193	25.7337
Sep	5,379	833	6,212	195	31.8553
	199,222	-7,801	191,420	2,389	80.1179
		-3.92%			

DISTRICT: WARSAW

CLASS: CS/LGS

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	22,802	-4,945	17,857	40	446.4245
Nov	31,029	22	31,051	40	776.2640
Dec	33,438	9,173	42,612	39	1092.6035
Jan	80,647	3,770	84,417	40	2110.4195
Feb	62,114	-3,736	58,379	42	1389.9691
Mar	76,009	-15,334	60,675	42	1444.6464
Apr	50,546	-7,506	43,040	43	1000.9251
May	42,965	-3,702	39,263	43	913.0884
Jun	19,281	-490	18,792	43	437.0131
Jul	12,348	84	12,432	43	289.1186
Aug	9,817	141	9,957	43	231.5674
Sep	9,286	2,211	11,497	43	267.3813
	450,282	-20,311	429,971	501	858.2250
		-4.51%			

DISTRICT: LAKE OF OZARKS

CLASS : GS - Residential

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	-	0	-	0	#DIV/0!
Nov	-	0	-	0	#DIV/0!
Dec	-	0	-	0	#DIV/0!
Jan	-	0	-	0	#DIV/0!
Feb	-	0	-	0	#DIV/0!
Mar	19,069	-4,307	14,762	244	60.5010
Apr	16,867	-4,253	12,614	504	25.0274
May	11,570	-2,797	8,773	672	13.0553
Jun	5,369	-418	4,951	760	6.5139
Jul	4,725	78	4,803	824	5.8289
Aug	4,723	155	4,878	979	4.9827
Sep	6,589	2,929	9,518	1,178	8.0795
	68,912	-8,613	60,299	5,161	11.6835
		-12.50%			

DISTRICT: LAKE OF OZARKS

CLASS: GS - Commercial (Sm. Commercial)

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	-	0	-	0	#DIV/0!
Nov	-	0	-	0	#DIV/0!
Dec	-	0	-	0	#DIV/0!
Jan	-	0	-	0	#DIV/0!
Feb	-	0	-	0	#DIV/0!
Mar	5,226	-999	4,227	29	145.7669
Apr	5,314	-1,004	4,310	61	70.6487
May	5,095	-642	4,453	79	56.3729
Jun	4,470	-99	4,371	92	47.5126
Jul	3,711	18	3,729	96	38.8410
Aug	4,509	33	4,542	108	42.0591
Sep	5,164	616	5,780	127	45.5124
	33,489	-2,076	31,413	592	53.0619
		-6.20%			

DISTRICT: LAKE OF OZARKS

CLASS: CS (LGS)

Normalized Sales per Customer

Billing Month	Ccf Actual	Ccf Adjustment	Ccf Normal	Customers	Normal Usage per Customer
Oct	-	0	-	0	#DIV/0!
Nov	-	0	-	0	#DIV/0!
Dec	-	0	-	0	#DIV/0!
Jan	-	0	-	0	#DIV/0!
Feb	-	0	-	0	#DIV/0!
Mar	558	-277	281	2	140.5085
Apr	1,905	-265	1,640	4	410.0363
May	1,763	-131	1,632	4	408.0945
Jun	2,102	-17	2,085	4	521.1798
Jul	2,161	4	2,165	6	360.9094
Aug	2,198	9	2,207	7	315.2429
Sep	2,201	176	2,377	9	264.0626
	12,888	-501	12,387	36	344.0828
		-3.89%			