Exhibit No.:

Issue: WNAR tariff

Witness: Michael L. Stahlman

Sponsoring Party: MO PSC Staff
Type of Exhibit: Direct Testimony
Case Nos.: GO-2019-0058

GO-2019-0059

Date Testimony Prepared: November 16, 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

1		DIRECT TESTIMONY
2		\mathbf{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 Com	mission, 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 Regulato	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	A.	The purpose of my testimony is to explain why Staff recommends rejection of
16	Spire Misson	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	ust 31, 2018. Briefly, Staff is recommending rejection because Spire ranks the
19	normal weath	ner 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

- calculating WNAR rate adjustments in future WNAR filings, to be consistent with the WNAR tariff language. This ranked method is discussed below and in the testimony of Staff witness Dr. Won.

 Q. What tariff language specifies how the normal heating degree days ("NDD") are to be calculated?
 - A. Tariff Sheet No. 13 for both Spire Missouri East and Spire Missouri West define NDD as "the total normal heating degree days based upon Staff's daily normal weather as determined in the most recent rate case."
 - Q. Does the tariff language require Spire to use the same ranking that was used in the most recent rate cases?
 - A. No. The tariff language specifies that the degree days be "based upon Staff's 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 weather was determined in the most recent rate case. The tariff language was written thus because Staff's ranked method requires the normal weather to be ranked consistent with the actual weather of the period. The words "based upon" also allow Spire to properly account for February 29th, as the test period in the last rate case was during a leap year. Staff witness Dr. Won further discusses the ranked method.
 - Q. Why did the tariff language not include "method" to state "based upon Staff's daily normal weather *method*"?
 - A. The inclusion of the word "method" could imply that Spire would need to 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 (" β ") 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.

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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			Normal HDD					
	Daily Temperature	("NDD") from	Temperature for	Actual		Ranked for					
	from Test Year of	Test Year of	Current WNAR	HDD	Spire's	Current WNAR	(NDD-ADD)				
	Rate Case	Rate Case	Period	("ADD")	(NDD- ADD)	Period	per Tariff				
Day 1	55	10	60	5	5	5	-				
Day 2	60	5	55	10	-5	10	-				

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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 there is any customer entering or leaving the system.
 - Q. Could Spire's method result in a correctly calculated WNAR?
- A. Potentially, but highly unlikely. The correct adjustment would only be achieved if there was either no change in the rank (i.e. the 2016 rank is the exact same as the 2018 rank, as shown in the attached worksheet Schedule MLS-d4) or if there was no change in customer counts for all bill cycles.
 - Q. Does this conclude your testimony?
 - A. Yes it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

			11			
In the Matter of Spire Missou d/b/a Spire's Request to Decre)	Case No. GO-2019-0058			
			and			
In the Matter of Spire Missou Spire's Request to Increase Its)	Case No. GO-2019-0059			
AFF	DAVIT OF I	MICHAEL	L. STAHLMAN			
STATE OF MISSOURI)					
COUNTY OF COLE) ss.)		241			
mind and lawful age; that he true and correct according to Further the Affiant sayeth	contributed to	the foregoi				
		JURAT				
Subscribed and sworn bet	ore me, a dul	y constituted	and authorized Notary Public	e, in and for		
the County of Cole, State of I	Missouri, at m	y office in J	efferson City, on this	$\frac{4h}{2}$ day of		
November 2018.						
D. SUZIE MANKIN Notary Public - Notary Sea State of Missourf Commissioned for Cole Cour My Commission Expires: December 1 Commission Number: 124120	I nty 2, 2020 170	2	Motary Public			

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 5th National Small Farm Conference in Springfield, IL in September 2009.

						2016	Hypotheical		Hypothetical NDD-ADD,	<u>Staff</u> <u>Reranked</u>	Hypothetical NDD-ADD,
					NORM_WX	Rank	Actual HDD	Rank	Company Method	Normal	Staff Method
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201612	201612	2016	12	2	26.82	14	11.87	2	14.95	11.87	-
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201612 2016 12 6 29.02 17 19.60 6 9.42 19.60 2016 12 7 31.75 20 20.95 7 10.80 20.95 2016 12 8 38.37 26 22.19 8 16.17 22.19 2016 12 9 39.75 27 22.89 9 16.86 22.89 2016 12 10 32.82 21 23.90 10 8.92 23.90 2016 12 11 18.23 5 24.85 11 (6.62) 24.85 2016 2 2016 12 13 34.62 23 26.23 13 8.39 26.23 2016 2 21 2 30.69 19 25.55 12 5.14 25.55 2016 2 2016 12 13 34.62 23 26.23 13 8.39 26.23 2016 2 2016 12 14 41.55 28 26.82 14 14.73 26.82 2016 2 2016 12 15 44.90 29 27.46 15 17.44 27.46 2016 2 2016 12 16 36.80 25 28.15 16 8.65 28.15 2016 2 2016 12 17 35.72 24 29.02 17 6.69 29.02 2016 2 2016 12 18 56.30 31 29.80 18 26.50 29.80 2016 2 2016 12 19 49.02 30 30.69 19 18.33 30.69 2016 2 2016 12 20 33.72 22 31.75 20 1.97 31.75 2016 2 2016 12 21 22 22.89 9 33.72 22 31.75 20 1.97 31.75 2016 2 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 2016 2 24 24.85 11 34.62 23 (9.77) 34.62 2016 2 24 24.85 11 34.62 23 (9.77) 34.62 2016 2 24 24.85 11 34.62 23 (9.77) 34.62 2016 2 24 25.85 11 34.62 23 (9.77) 34.62 2016 2 24 25.85 11 34.62 23 (9.77) 34.62 2016 2 24 25.85 11 34.62 23 (9.77) 34.62 2016 2 26 5.82 1 38.37 26 (32.55) 38.37 2016 2 2016 12 24 25.85 11 38.37 26 (32.55) 38.37 2016 2 2016 12 29 24.485 11 38.37 26 (32.55) 38.37 2016 2 2016 12 29 24.485 11 34.60 29 (30.48) 44.90 2016 2016 12 29 24.485 11 38.37 26 (32.55) 38.37 2016 2 2016 12 29 24.485 13 38.37 26 (32.55) 38.37 2016 2016 12 29 24.485 13 38.37 26 (32.55) 38.37 2016	201612	2016	12		26.23	13	16.51		9.72	16.51	-
201612 2016 12											-
201612 2016 12											-
201612 2016 12 9 39.75 27 22.89 9 16.86 22.89 201612 2016 12 10 32.82 21 23.90 10 8.92 23.90 201612 2016 12 11 18.23 5 24.85 11 (6.62) 24.85 201612 2016 12 12 30.69 19 25.55 12 5.14 25.55 201612 2016 12 13 34.62 23 26.23 13 8.39 26.23 201612 2016 12 14 41.55 28 26.82 14 14.73 26.82 201612 2016 12 15 44.90 29 27.46 15 17.44 27.46 201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 201612 2016 12 26 5.82 1 38.37 26 (32.55) 38.37 201612 2016 12 28 20.95 7 41.55 28 (20.60) 41.55 201612 2016 12 29 14.42 3 34.90 29 (30.48) 44.90 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 2016 12 29 14.42 3 44											-
201612 2016 12 10 32.82 21 23.90 10 8.92 23.90 201612 2016 12 11 18.23 5 24.85 11 (6.62) 24.85 201612 2016 12 13 34.62 23 25.55 12 5.14 25.55 201612 2016 12 13 34.62 23 26.23 13 8.39 26.23 201612 2016 12 14 41.55 28 26.82 14 14.73 26.82 201612 2016 12 15 44.90 29 27.46 15 17.44 27.46 201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 201612 2016 12 26 5.82 1 38.37 26 (32.55) 38.37 201612 2016 12 28 20.95 7 41.55 28 (20.60) 41.55 201612 2016 12 29 14.42 3 34.490 29 30.48 44.90 201612 2016 12 29 14.42 3 44.90 29 30.48 44.90 201612 2016 12 29 14.42 3 44.90 29 30.48 44.90 201612 2016 12 29 14.42 3 44.90 29 30.48 44.90 201612 2016 12 29 14.42 3 44.90 29 30.48 44.90 201612 2016 12 2016 12 29 14.42 3 44.90 29 30.48 44.90 201612 2016 12 2016 12 29 14.42 3 44.90 29 30.69 30.69 40.50 4											-
201612 2016 12 11 18.23 5 24.85 11 (6.62) 24.85 201612 2016 12 12 30.69 19 25.55 12 5.14 25.55 201612 2016 12 13 34.62 23 26.23 13 8.39 26.23 201612 2016 12 14 41.55 28 26.82 14 14.73 26.82 201612 2016 12 15 44.90 29 27.46 15 17.44 27.46 201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 19 49.02 30 30											=
201612 2016 12 12 12 30.69 19 25.55 12 5.14 25.55 201612 2016 12 13 34.62 23 26.23 13 8.39 26.23 201612 2016 12 14 41.55 28 26.82 14 14.73 26.82 201612 2016 12 15 44.90 29 27.46 15 17.44 27.46 201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 20 33.72 22											-
201612 2016 12 13 34.62 23 26.23 13 8.39 26.23 201612 2016 12 14 41.55 28 26.82 14 14.73 26.82 201612 2016 12 15 44.90 29 27.46 15 17.44 27.46 201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 21 28.15 16 3											-
201612 2016 12 14 41.55 28 26.82 14 14.73 26.82 201612 2016 12 15 44.90 29 27.46 15 17.44 27.46 201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 <td< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></td<>											
201612 2016 12 15 44.90 29 27.46 15 17.44 27.46 201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 <th< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>_</td></th<>											_
201612 2016 12 16 36.80 25 28.15 16 8.65 28.15 201612 2016 12 17 35.72 24 29.02 17 6.69 29.02 201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 <th< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>-</td></th<>											-
201612 2016 12 18 56.30 31 29.80 18 26.50 29.80 201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 201612 2016 12 26 5.82 1											-
201612 2016 12 19 49.02 30 30.69 19 18.33 30.69 201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 201612 2016 12 26 5.82 1 38.37 26 (32.55) 38.37 201612 2016 12 27 22.19 8	201612	2016	12	17	35.72	24	29.02	17	6.69	29.02	-
201612 2016 12 20 33.72 22 31.75 20 1.97 31.75 201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 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	201612	2016	12	18	56.30	31	29.80	18	26.50	29.80	-
201612 2016 12 21 28.15 16 32.82 21 (4.67) 32.82 201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 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 (20.60) 41.55 201612 2016 12 29 14.42 3	201612	2016	12	19	49.02	30	30.69	19		30.69	-
201612 2016 12 22 22.89 9 33.72 22 (10.83) 33.72 201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 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 (20.60) 41.55 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10											-
201612 2016 12 23 24.85 11 34.62 23 (9.77) 34.62 201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 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 (20.60) 41.55 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02											=
201612 2016 12 24 16.51 4 35.72 24 (19.21) 35.72 201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 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 (20.60) 41.55 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02											-
201612 2016 12 25 11.87 2 36.80 25 (24.94) 36.80 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 (20.60) 41.55 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02											-
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 (20.60) 41.55 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02						-					=
201612 2016 12 27 22.19 8 39.75 27 (17.56) 39.75 201612 2016 12 28 20.95 7 41.55 28 (20.60) 41.55 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02											=
201612 2016 12 28 20.95 7 41.55 28 (20.60) 41.55 201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02											-
201612 2016 12 29 14.42 3 44.90 29 (30.48) 44.90 201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02											-
201612 2016 12 30 23.90 10 49.02 30 (25.12) 49.02											-
											-
201612 2016 12 31 19.60 6 56.30 31 (36.70) 56.30	201612	2016	12	31	19.60	6	56.30	31	(36.70)	56.30	-

1441.65

0.00

1441.65

0.00

Sum =

1441.65

				•	
YCLE	NOV		DEC		
	2016		2016		
				Company	Staff
				Method	Method
1	1-Nov	30	1-Dec	-	-
2	2-Nov	30	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-Nov	32	12-Dec	310.60	-
9	11-Nov	32	13-Dec	320.60	-
10	15-Nov	30	15-Dec	353.09	-
11	16-Nov	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-Dec	419.30	-
15	22-Nov	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	-

* Using the rank method discussed in Staff's testimony and the tariff, the above sum would be zero.

								Hypothetical NDD-	Staff	ADD,
				NORM_WX	2016 Rank	Hypotheical Actual HDD	Rank	ADD, Company Method	Reranked Normal	Staff Method
201610	2016	10	1	2.69	12	2.69	12	-	2.69	-
201610	2016	10	2	3.74	13	3.74	13	-	3.74	-
201610	2016	10	3	1.00	10	1.00	10	-	1.00	-
201610	2016 2016	10 10	4 5	0.00	1	-	1	-	-	-
201610	2016	10	6	0.00	1		1	-	-	
201610	2016	10	7	11.33	22	11.33	22	-	11.33	-
201610	2016	10	8	13.11	24	13.11	24	-	13.11	-
201610	2016	10	9	7.92	18	7.92	18	-	7.92	-
201610	2016 2016	10 10	10 11	7.09 0.15	17 9	7.09 0.15	17 9	-	7.09 0.15	-
201610	2016	10	12	6.26	16	6.26	16	-	6.26	-
201610	2016	10	13	20.51	30	20.51	30	-	20.51	
201610	2016	10	14	12.28	23	12.28	23	-	12.28	-
201610	2016	10	15	0.00	1	•	1	-	-	-
201610	2016 2016	10 10	16 17	0.00	1	-	1	-	-	-
201610	2016	10	18	0.00	1		1	-	-	
201610	2016	10	19	8.77	19	8.77	19	-	8.77	-
201610	2016	10	20	16.22	27	16.22	27	-	16.22	-
201610	2016 2016	10 10	21	24.10 18.52	31 29	24.10 18.52	31 29	-	24.10 18.52	-
201610	2016	10	23	18.52	11	1.78	11	-	1.78	-
201610	2016	10	24	15.11	26	15.11	26	-	15.11	-
201610	2016	10	25	14.13	25	14.13	25	-	14.13	-
201610 201610	2016 2016	10 10	26 27	10.36 17.17	21 28	10.36 17.17	21 28		10.36 17.17	-
201610	2016	10	28	5.46	15	5.46	15		5.46	-
201610	2016	10	29	0.00	1	-	1	-	-	-
201610	2016 2016	10 10	30 31	4.68 9.50	14 20	4.68 9.50	14 20		4.68 9.50	-
201610	2016	11	1	0.82	20	39.58	30	38.76	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 2016	11	4 5	8.24 14.00	6 11	30.21 28.82	27 26	21.97 14.82	30.21 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 2016	11 11	8 9	11.68 19.25	9 17	25.29 24.30	23 22	13.61 5.05	25.29 24.30	-
201611	2016	11	10	18.51	16	23.37	22	4.86	23.37	-
201611	2016	11	11	14.96	12	22.25	20	7.29	22.25	
201611	2016	11	12	23.37	21	21.16	19	(2.22)	21.16	-
201611	2016 2016	11 11	13 14	22.25 12.86	20 10	20.15 19.25	18 17	(2.10) 6.40	20.15 19.25	
201611	2016	11	15	17.82	15	18.51	16	0.69	18.51	
201611	2016	11	16	9.57	7	17.82	15	8.26	17.82	-
201611	2016 2016	11	17 18	3.13	3	16.76 15.74	14 13	13.63 4.88	16.76 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 2016	11	22 23	25.29 20.15	23 18	11.68 10.86	9	(13.61) (9.29)	11.68 10.86	
201611	2016	11	24	28.82	26	9.57	7	(19.25)	9.57	
201611	2016	11	25	27.51	25	8.24	6	(19.27)	8.24	-
201611	2016 2016	11	26 27	26.25 24.30	24 22	7.01 5.24	5 4	(19.24) (19.07)	7.01 5.24	
201611	2016	11	28	21.16	19	3.13	3	(18.02)	3.13	-
201611	2016	11	29	16.76	14	0.82	2	(15.95)	0.82	-
201611	2016 2016	11 12	30	31.84 27.46	28 15	27.46	1 15	(31.84)	27.46	-
201612	2016	12	1 2	27.46 26.82	15 14	27.46 26.82	15 14		27.46	-
201612	2016	12	3	29.80	18	29.80	18		29.80	-
201612	2016 2016	12 12	4	26.23	13 12	26.23 25.55	13 12	•	26.23 25.55	-
201612	2016 2016	12	5 6	25.55 29.02	12 17	25.55 29.02	12 17		25.55 29.02	-
201612	2016	12	7	31.75	20	31.75	20		31.75	-
201612	2016	12	8	38.37	26	38.37	26	-	38.37	-
201612	2016 2016	12 12	9 10	39.75 32.82	27 21	39.75 32.82	27 21	•	39.75 32.82	-
201612	2016	12	11	18.23	5	18.23	5		18.23	-
201612	2016	12	12	30.69	19	30.69	19		30.69	-
201612	2016 2016	12 12	13 14	34.62 41.55	23 28	34.62 41.55	23 28	-	34.62 41.55	-
201612	2016	12	14	44.90	28 29	44.90	28 29	-	41.55	
201612	2016	12	16	36.80	25	36.80	25	-	36.80	-
201612	2016	12	17	35.72	24	35.72	24	-	35.72	-
201612	2016 2016	12 12	18 19	56.30 49.02	31 30	56.30 49.02	31 30		56.30 49.02	-
201612	2016	12	20			49.02 33.72	22		33.72	-
201612	2016	12	21	28.15	16	28.15	16		28.15	-
201612	2016	12	22	22.89		22.89	9	-	22.89	
201612 201612	2016 2016	12 12	23 24	24.85 16.51	11 4	24.85 16.51	11 4		24.85 16.51	-
201612	2016	12	25	11.87	4 2	11.87	2		11.87	-
201612	2016	12	26	5.82	1	5.82	1		5.82	-
201612	2016 2016	12 12	27 28			22.19 20.95	8 7		22.19 20.95	-
201612	2016	12	28	20.95 14.42	3	14.42	3		14.42	-
201612	2016	12	30	23.90	10	23.90	10		23.90	-
201612	2016	12	31	19.60	6	19.60	6	•	19.60	-
								(0.00)		

(0.00)

	Company Method	DEC		NOV		OCT
	Wicthou	2016		2016		2016
ec Cycle	Nov Cycle I	2010		2010		2010
-	-	1-Dec	30	1-Nov	29	3-Oct
(38.76)	38.76	2-Dec	30	2-Nov	29	4-Oct
(72.98)	72.98	5-Dec	32	3-Nov	29	5-Oct
(99.58)	99.58	6-Dec	32	4-Nov	29	6-Oct
(148.15)	148.15	7-Dec	30	7-Nov	31	7-Oct
(167.39)	167.39	8-Dec	30	8-Nov	29	10-Oct
(181.00)	181.00	9-Dec	30	9-Nov	28	12-Oct
(186.05)	186.05	12-Dec	32	10-Nov	28	13-Oct
(190.90)	190.90	13-Dec	32	11-Nov	28	14-Oct
(200.27)	200.27	15-Dec	30	15-Nov	29	17-Oct
(200.96)	200.96	16-Dec	30	16-Nov	29	18-Oct
(209.22)	209.22	19-Dec	32	17-Nov	29	19-Oct
(222.85)	222.85	20-Dec	32	18-Nov	28	21-Oct
(186.89)	186.89	21-Dec	30	21-Nov	28	24-Oct
(165.54)	165.54	22-Dec	30	22-Nov	28	25-Oct
(151.93)	151.93	27-Dec	34	23-Nov	28	26-Oct
(65.81)	65.81	28-Dec	30	28-Nov	32	27-Oct
(47.79)	47.79	29-Dec	30	29-Nov	32	28-Oct

Hypotheti cal NDD-

2,536.05 (2,536.05)

				2016	<u>Hypotheical</u>		Hypothetical NDD-ADD, Company	Staff Reranked	Hypothetical NDD-ADD,	Difference Between Company
201611	2016	11	NORM_W. 1 0.82	Rank 2	Actual HDD Ra 0.90	nk 2	<u>Method</u> (0.08)	<u>Normal</u> 0.82	Staff Method (0.08)	and Staff
201611	2016	11	2 0.00	1	-	1	(0.00)	-	(0.00)	-
201611	2016	11	3 5.24	4	5.76	4	(0.52)	5.24	(0.52)	-
201611	2016	11	4 8.24	6	9.06	6	(0.82)	8.24	(0.82)	-
201611	2016	11	5 14.00	11	15.40	11	(1.40)	14.00	(1.40)	-
201611	2016	11	6 15.74	13	17.31	13	(1.57)	15.74	(1.57)	-
201611	2016	11	7 7.01	5	7.72	5	(0.70)	7.01	(0.70)	-
201611	2016 2016	11 11	8 11.68 9 19.25	9 17	12.85 21.18	9 17	(1.17) (1.93)	11.68 19.25	(1.17) (1.93)	
201611	2016		18.51	16	20.36	16	(1.85)	18.51	(1.85)	-
201611	2016		14.96	12	16.46	12	(1.50)	14.96	(1.50)	-
201611	2016	11 1	23.37	21	25.71	21	(2.34)	23.37	(2.34)	-
201611	2016		L3 22.25	20	24.47	20	(2.22)	22.25	(2.22)	-
201611	2016		12.86	10	14.14	10	(1.29)	12.86	(1.29)	-
201611	2016		17.82	15	19.61	15	(1.78)	17.82	(1.78)	-
201611	2016 2016		9.57 17 3.13	7 3	10.53 3.45	7 3	(0.96) (0.31)	9.57 3.13	(0.96) (0.31)	
201611	2016		10.86	8	11.95	8	(1.09)	10.86	(1.09)	-
201611	2016		30.21	27	33.23	27	(3.02)	30.21	(3.02)	-
201611	2016	11 2	39.58	30	43.54	30	(3.96)	39.58	(3.96)	-
201611	2016	11 2	2 <mark>1</mark> 34.21	29	37.63	29	(3.42)	34.21	(3.42)	-
201611	2016		25.29	23	27.82	23	(2.53)	25.29	(2.53)	-
201611	2016		20.15	18	22.16	18	(2.01)	20.15	(2.01)	-
201611	2016 2016		24 28.82 25 27.51	26 25	31.70 30.26	26 25	(2.88)	28.82 27.51	(2.88)	-
201611	2016		26 26.25	24	28.88	25	(2.75) (2.63)	26.25	(2.75) (2.63)	-
201611	2016		27 24.30	22	26.73	22	(2.43)	24.30	(2.43)	-
201611	2016	11 2	28 21.16	19	23.27	19	(2.12)	21.16	(2.12)	-
201611	2016	11 2	29 16.76	14	18.44	14	(1.68)	16.76	(1.68)	-
201611	2016	11 3	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 26.82	14	29.50	14	(2.68)	26.82	(2.68)	-
201612 201612	2016 2016	12 12	3 29.80 4 26.23	18 13	32.78 28.85	18 13	(2.98) (2.62)	29.80 26.23	(2.98) (2.62)	
201612	2016	12	5 25.55	12	28.10	12	(2.55)	25.55	(2.55)	-
201612	2016	12	6 29.02	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 2016		10 32.82 11 18.23	21 5	36.10	21 5	(3.28)	32.82	(3.28)	-
201612 201612	2016		18.23 12 30.69	5 19	20.05 33.76	5 19	(1.82) (3.07)	18.23 30.69	(1.82) (3.07)	-
201612	2016		34.62	23	38.08	23	(3.46)	34.62	(3.46)	-
201612	2016		41.55	28	45.71	28	(4.16)	41.55	(4.16)	-
201612	2016	12 1	L5 44.90	29	49.39	29	(4.49)	44.90	(4.49)	-
201612	2016		<mark>16</mark> 36.80	25	40.48	25	(3.68)	36.80	(3.68)	-
201612	2016		L7 35.72	24	39.29	24	(3.57)	35.72	(3.57)	-
201612	2016		56.30	31	61.93	31	(5.63)	56.30	(5.63)	-
201612 201612	2016 2016		49.02 20 33.72	30 22	53.92 37.09	30 22	(4.90) (3.37)	49.02 33.72	(4.90) (3.37)	
201612	2016		21 28.15	16	30.96	16	(2.81)	28.15	(2.81)	-
201612	2016		22 22.89	9	25.18	9	(2.29)	22.89	(2.29)	-
201612	2016		24.85	11	27.34	11	(2.49)	24.85	(2.49)	-
201612	2016		2 <mark>4</mark> 16.51	4	18.16	4	(1.65)	16.51	(1.65)	-
201612	2016		25 11.87	2	13.05	2	(1.19)	11.87	(1.19)	-
201612	2016		5.82	1	6.40	1	(0.58)	5.82	(0.58)	-
201612	2016		27 22.19	8 7	24.41 23.04	8 7	(2.22)	22.19 20.95	(2.22)	-
201612 201612	2016 2016		28 20.95 29 14.42	3	15.87	3	(2.09) (1.44)	14.42	(2.09) (1.44)	-
201612	2016		23.90	10	26.29	10	(2.39)	23.90	(2.39)	-
201612	2016		19.60	6	21.56	6	(1.96)	19.60	(1.96)	-