

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**North American Electric Reliability  
Corporation**

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**Docket No. RM13-13-000**

**INFORMATIONAL FILING OF THE  
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION AND  
WESTERN ELECTRICITY COORDINATING COUNCIL  
REGARDING REGIONAL RELIABILITY STANDARD BAL-002-WECC-2**

The North American Electric Reliability Corporation (“NERC”) and the Western Electricity Coordinating Council (“WECC”) hereby submit this informational filing (“Informational Filing”) to the Federal Energy Regulatory Commission (“Commission”) as directed in this proceeding in Order No. 789.<sup>1</sup> In Order No. 789, the Commission approved regional Reliability Standard BAL-002-WECC-2 and directed NERC “to submit an informational filing two years after implementation of regional Reliability Standard BAL-002-WECC-2 that assesses whether the new methodology for calculating minimum contingency reserve levels has had an adverse impact on reliability in the Western Interconnection[,]” and whether Contingency Reserves are adequate.<sup>2</sup> As detailed in this Informational Filing and supported by **Appendices 1 and 2**, Contingency Reserves in the Western Interconnection remain adequate, demonstrating that the BAL-002-WECC-2 methodology for calculating minimum Contingency Reserve levels has not adversely impacted reliability in the Western Interconnection.<sup>3</sup>

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<sup>1</sup> *Regional Reliability Standard BAL-002-WECC-2 – Contingency Reserve*, Order No. 789, 145 FERC ¶ 61,141 78 Fed. Reg. 71448 (2013).

<sup>2</sup> *Id.* at P 36. *See also, id.*, at PP 2 and 26 (directing an informational filing, “that addresses the adequacy of contingency reserve in the Western Interconnection.”).

<sup>3</sup> **Appendix 1** reflects the downward trend in reportable DCS events and **Appendix 2** reflects the adequacy of reserves as demonstrated by actual reserves compared with required reserves in the Western Interconnection.

## **I. NOTICES AND COMMUNICATIONS**

Notices and communications regarding this filing may be addressed to the following:<sup>4</sup>

Shamai Elstein\*  
Senior Counsel  
Candice Castaneda\*  
Counsel  
North American Electric Reliability  
Corporation  
1325 G Street, N.W., Suite 600  
Washington, DC 20005  
(202) 400-3000  
shamai.elstein@nerc.net  
candice.castaneda@nerc.net

Howard Gugel\*  
Director of Standards  
North American Electric Reliability  
Corporation  
3353 Peachtree Road, N.E.  
Suite 600, North Tower  
Atlanta, GA 30326  
(404) 446-2560  
Howard.Gugel@nerc.net

Sandy Mooy\*  
Associate General Counsel  
Chris Albrecht\*  
Counsel  
Western Electricity Coordinating Council  
155 North 400 West, Suite 200  
Salt Lake City, UT 84103  
Phone: (801) 883-6879  
smooy@wecc.biz  
calbrecht@wecc.biz

Steve Rueckert\*  
Director of Standards  
Western Electricity Coordinating Council  
155 North 400 West, Suite 200  
Salt Lake City, UT 84103  
(801) 883-6878  
steve@wecc.biz

## **II. HISTORY OF THE PROCEEDING**

On April 12, 2013, NERC and WECC requested Commission approval of BAL-002-WECC-2.<sup>5</sup> Regional Reliability Standard BAL-002-WECC-2 is intended to specify the quantity and types of Contingency Reserve required to ensure reliability under normal and abnormal conditions. The standard requires Balancing Authorities (“BAs”) and Reserve Sharing Groups

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<sup>4</sup> Persons to be included on the Commission’s service list are identified by an asterisk. NERC and WECC respectfully request a waiver of Rule 203 of the Commission’s regulations, 18 C.F.R. § 385.203 (2014), to allow the inclusion of more than two persons on the service list in this proceeding.

<sup>5</sup> Joint Petition of North American Electric Reliability Corporation and Western Electricity Coordinating Council for Approval of WECC Regional Reliability Standard BAL-002-WECC-2 - Contingency Reserve, Docket No. RM13-13-000 (filed Apr. 12, 2013).

(“RSGs”) to maintain minimum Contingency Reserves, except under limited circumstances. Requirement R1 of the standard establishes the methodology that BAs and RSGs should use to calculate minimum Contingency Reserves.

Specifically, BAL-002-WECC-2 calculates minimum Contingency Reserve “based on the greater of the most severe single contingency or the sum of three percent of load plus three percent of net generation.”<sup>6</sup> In Order No. 789, the Commission approved BAL-002-WECC-2. The Commission stated that:

[t]he method for calculating minimum contingency reserve in the regional Reliability Standard is more stringent than ...BAL-002-1 because it requires minimum contingency reserve levels that will be at least equal to the NERC Reliability Standard minimum (i.e., equal to the most severe single contingency) and more often will be greater.<sup>7</sup>

Order No. 789 also directed “NERC to submit an informational filing after the first two years of implementation of the regional Reliability Standard that addresses the adequacy of contingency reserve in the Western Interconnection[,]” and whether the methodology to calculate minimum Contingency Reserve has had an adverse impact on reliability in the West.<sup>8</sup>

Order No. 789 explained that the Commission’s Notice of Proposed Rulemaking (“NOPR”) stated that NERC and WECC should assess minimum Contingency Reserve levels in the West following implementation of the standard. The Commission summarized that:

[t]he NOPR stated that the informational filing should assess whether the new methodology for calculating minimum contingency reserve levels has had an adverse impact on reliability in the Western Interconnection and should include the data that NERC and WECC use to assess the sufficiency of the minimum contingency reserve levels under the new methodology. The NOPR stated that such data could include, but need not be limited to an increase or decrease in the ‘Average Percent Non-Recovery Disturbance Control Standards (DCS) Events,’ an increase or decrease in the average Contingency Reserve Restoration Period, an increase or decrease in the number of events larger than the minimum

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<sup>6</sup> Order No. 789, at P 28 (summarizing the standard).

<sup>7</sup> Order No. 789, at P 26.

<sup>8</sup> *Id.*; and *id.* at PP 32 and 36.

contingency reserve levels, and any other information that NERC or WECC deem relevant.<sup>9</sup>

NERC committed to submit the proposed informational filing, supported by data used to assess BAL-002-WECC-2.<sup>10</sup> Order No. 789 adopted the NOPR's proposal and required NERC to submit an informational filing, in consultation with WECC, two years after implementation of BAL-002-WECC-2, "assess[ing] whether the new methodology for calculating minimum contingency reserve levels has had an adverse impact on reliability in the Western Interconnection[,]” and the adequacy of Contingency Reserves.<sup>11</sup> This informational filing is submitted to comply with that directive.

### **III. IMPLEMENTATION OF THE REGIONAL RELIABILITY STANDARD**

WECC data demonstrates that regional Reliability Standard BAL-002-WECC-2 has not adversely affected reliability in the Western Interconnection, by establishing that Contingency Reserve levels remain adequate in the West. First, the WECC Compliance Department confirms that since October 1, 2014 when BAL-002-WECC-2 became effective, there have been no reported violations of the BAL-002-1 Disturbance Recovery Criterion or the Recovery Period, and no violations have been identified in any Compliance Audits. As a result, this indicates that BAs and RSGs met the Disturbance Recovery Criterion within the Disturbance Recovery Period for 100% of Reportable Disturbances and there were no non-recovery DCS events.<sup>12</sup>

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<sup>9</sup> *Id.* at P 32.

<sup>10</sup> *Id.* at P 33.

<sup>11</sup> *Id.* at P 36. *See also, id.* at PP 2 and 26.

<sup>12</sup> The Disturbance Recovery Criterion is defined in Reliability Standard BAL-002-1 as “R4.1. A Balancing Authority shall return its ACE to zero if its ACE just prior to the Reportable Disturbance was positive or equal to zero. For negative initial ACE values just prior to the Disturbance, the Balancing Authority shall return ACE to its pre-Disturbance value. R4.2. The default Disturbance Recovery Period is 15 minutes after the start of a Reportable Disturbance.”).

Further, data summarized in **Appendix 1** reflects a downward trend in reportable DCS events. **Appendix 1** shows that between October 1, 2012 and September 30, 2014, there were 183 reportable DCS events less than the Most Severe Single Contingency (“MSSC”) in the Western Interconnection. In contrast, **Appendix 1** reveals that between October 1, 2014 and June 30, 2016 (after effectiveness of BAL-002-WECC-2) there were 121 reportable DCS events less than the MSSC in the Western Interconnection. This reflects more than 30% decrease in reportable DCS events less than MSSC. Additionally, **Appendix 1** demonstrates that the number of DCS events greater than MSSC declined from six during the two-year period immediately preceding the effective date of BAL-002-WECC-2 to four during the period that BAL-002-WECC-2 has been effective. Such evidence regarding the lack of non-recovery DCS events and the reduction in events larger than MSSC reflect the type of data that the NOPR contemplated could be used to establish that BAL-002-WECC-2 has not adversely affected Contingency Reserve levels or, by extension, reliability.<sup>13</sup>

Moreover, information on reserve levels captured in WECC Daily Reports underscore the continued existence of adequate Contingency Reserve levels in the Western Interconnection. WECC’s Daily Reports provide information on (i) daily required and projected reserve levels and (ii) actual reserves from the prior day.<sup>14</sup> **Appendix 2** compares actual and required reserves from 101 Daily Reports dated from October 1, 2014 through August 31, 2016. The raw reserve data and graph in **Appendix 2** show that actual reserves have been substantially higher than required levels throughout the period that BAL-002-WECC-2 has been effective. Thus, WECC data regarding (i) the lack of non-recovery DCS Events, (ii) the decreasing number of events

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<sup>13</sup> *Id.* at P 32 (quoted above at *supra*, n. 9 and accompanying text).

<sup>14</sup> *See, e.g.*, WECC Daily Status Reports, *available at*, <https://www.wecc.biz/EventAnalysisSituationalAwareness/Pages/default.aspx>.

larger than MSSC, and (iii) sufficiency of actual reserves all demonstrate that BAL-002-WECC-2 has not adversely impacted reliability.

#### **IV. CONCLUSION**

Wherefore, for the foregoing reasons, the methodology implemented under regional Reliability Standard BAL-002-WECC-2 for calculating minimum contingency reserve levels has not adversely impacted reliability in the Western Interconnection and Contingency Reserve levels remain adequate. NERC and WECC respectfully request that the Commission accept this informational filing as compliant with the Commission's directive in Order No. 789.

Respectfully submitted,

/s/ Candice Castaneda

/s/ Chris Albrecht

Shamai Elstein  
Senior Counsel  
Candice Castaneda  
Counsel  
North American Electric Reliability Corporation  
1325 G Street, N.W., Suite 600  
Washington, DC 20005  
(202) 400-3000  
shamai.elstein@nerc.net  
candice.castaneda@nerc.net

Sandy Mooy  
Associate General Counsel  
Chris Albrecht  
Counsel  
Western Electricity Coordinating Council  
155 North 400 West, Suite 200  
Salt Lake City, UT 84103  
(801) 883-6879  
smooy@wecc.biz  
calbrecht@wecc.biz

*Counsel for the North American Electric  
Reliability Corporation*

*Counsel for the Western Electric Coordinating  
Council*

Date: October 3, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding. Dated at Washington, D.C. this 3<sup>rd</sup> day of October, 2016.

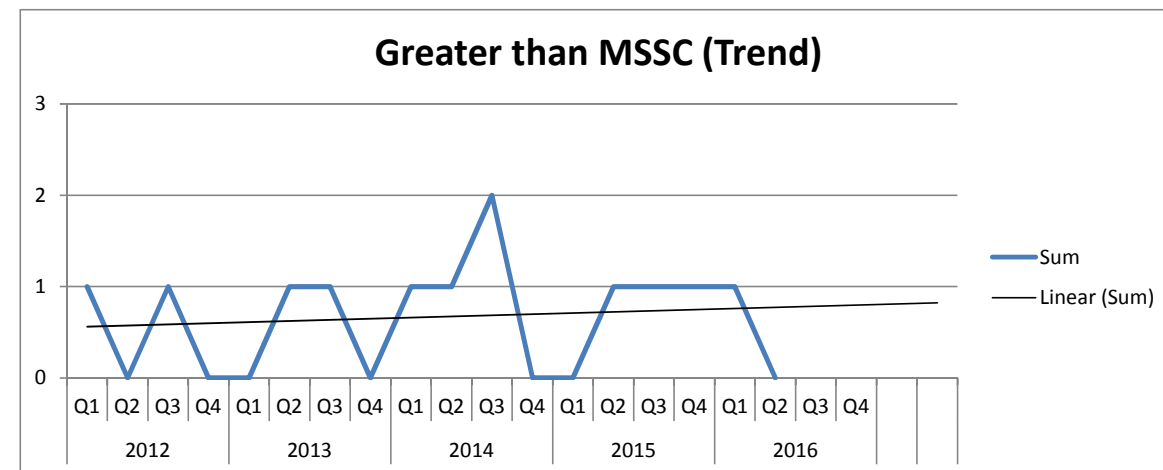
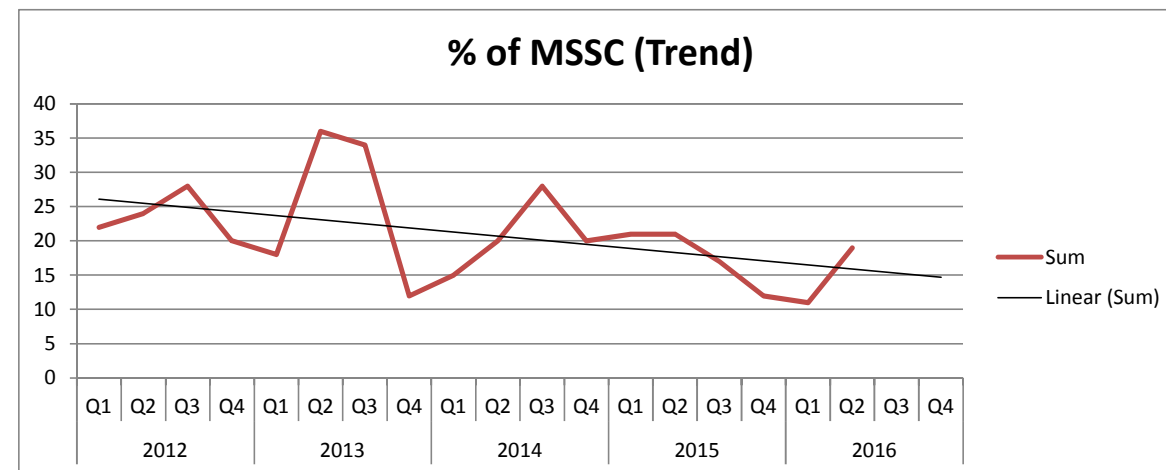
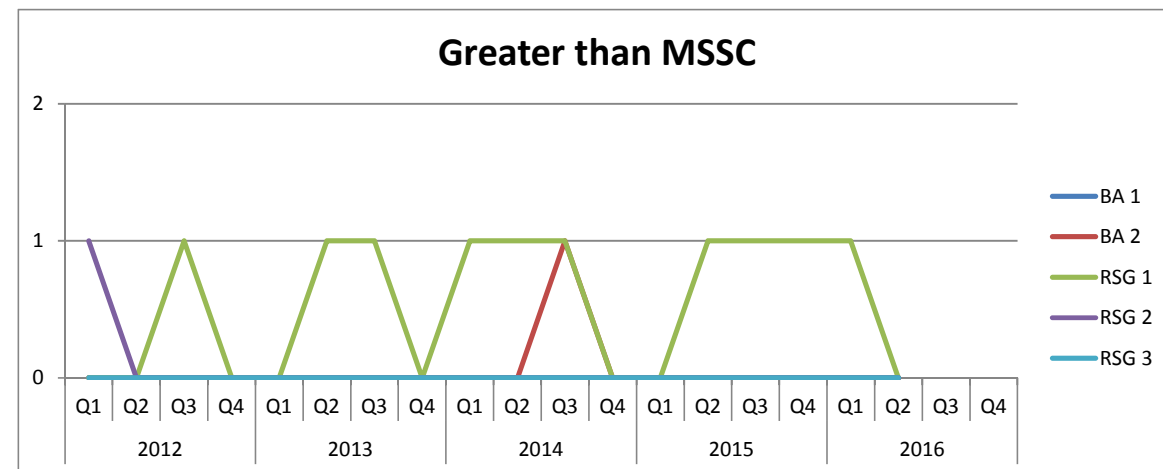
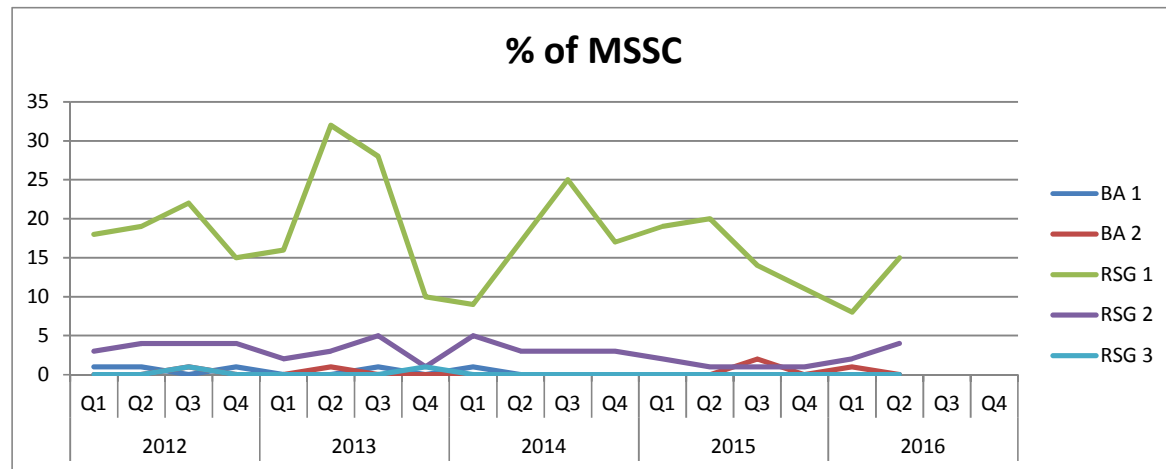
*/s/ Candice Castaneda*

Candice Castaneda  
Counsel  
North American Electric Reliability  
Corporation  
1325 G Street, N.W., Suite 600  
Washington, DC 20005  
(202) 400-3000  
candice.castaneda@nerc.net

*Counsel for North American Electric  
Reliability Corporation*

Greater than MSSC																				
Region	2012				2013				2014				2015				2016			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
BA 1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
BA 2	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
RSG 1	0	0	1	0	0	1	1	0	1	1	1	0	0	1	1	1	1	1	0	0
RSG 2	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RSG 3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sum	1	0	1	0	0	1	1	0	1	1	2	0	0	1	1	1	1	1	1	0

% of MSSC																				
Region	2012				2013				2014				2015				2016			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
BA 1	1	1	0	1	0	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0
BA 2	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	2	0	1	0	0
RSG 1	18	19	22	15	16	32	28	10	9	17	25	17	19	20	14	11	8	15	0	0
RSG 2	3	4	4	4	2	3	5	1	5	3	3	3	2	1	1	1	2	4	0	0
RSG 3	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0
Sum	22	24	28	20	18	36	34	12	15	20	28	20	21	21	17	12	11	19	0	0





**Disturbance Control Standard**

Region	WECC	Qtr	2	Year	2016	Date	Q2 2016
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0		0			
BA 2		0	N/A	0	N/A		
RSG 1		15	100.0%	N/A	100.0%		
RSG 2		4	100.0%	N/A			
RSG 3		0	100.0%	0	N/A		

Region	WECC	Qtr	1	Year	2016	Date	Q1 2016
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0		0			
BA 2		1	100.0%	N/A			
RSG 1		8	100.0%	1	100.0%		
RSG 2		2	100.0%	N/A			
RSG 3		0	100.0%	0	N/A		

**Disturbance Control Standard**

Region	WECC	Qtr	4	Year	2015	Date	Q4 2015
Control Area				Disturbance Control Standard			
				Reportable Disturbances <= the most severe single contingency		Disturbances > the most severe single contingency	
				Number	Average Percent Recovery	Number	Average Percent Recovery
BA 1			0			0	
BA 2			0	N/A		0	N/A
RSG 1			11	100.0%		1	100.0%
RSG 2			1	100.0%		N/A	
RSG 3			0	100.0%		0	N/A

**Disturbance Control Standard**

Region	WECC	Qtr	3	Year	2015	Date	Q3 2015
Control Area				Disturbance Control Standard			
				Reportable Disturbances <= the most severe single contingency		Disturbances > the most severe single contingency	
				Number	Average Percent Recovery	Number	Average Percent Recovery
BA 1			0			0	
BA 2			2	100.0%		0	N/A
RSG 1			14	100.0%		1	100.0%
RSG 2			1	100.0%		N/A	
RSG 3			0	N/A		0	N/A

**Disturbance Control Standard**

Region	WECC	Qtr	2	Year	2015	Date	Q2 2015
Control Area				Disturbance Control Standard			
				Reportable Disturbances <= the most severe single contingency		Disturbances > the most severe single contingency	
				Number	Average Percent Recovery	Number	Average Percent Recovery
BA 1			0			0	
BA 2			0	N/A		0	N/A
RSG 1			20	100.0%		1	100.0%
RSG 2			1	100.0%		N/A	
RSG 3			0	N/A		0	N/A

**Disturbance Control Standard**

Region	WECC	Qtr	1	Year	2015	Date	Q1 2015
Control Area				Disturbance Control Standard			
				Reportable Disturbances <= the most severe single contingency		Disturbances > the most severe single contingency	
				Number	Average Percent Recovery	Number	Average Percent Recovery
BA 1			0			NA	
BA 2			0	NA		0	NA
RSG 1			19	100.0%		0	100.0%
RSG 2			2	100.0%		NA	
RSG 3			0	100.0%		0	NA

**Disturbance Control Standard**

Region	WECC	Qtr	4	Year	2014	Date	Q4 2014
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0	NA	0	NA		
BA 2		0	NA	0	NA		
RSG 1		17	100.0%	0	NA		
RSG 2		3	100.0%	0	NA		
RSG 3		0	NA	0	NA		

**Disturbance Control Standard**

Region	WECC	Qtr	3	Year	2014	Date	Q3 2014
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0	N/A	0	N/A		
BA 2		0	N/A	1	100.0%		
RSG 1		25	100.0%	1	100.0%		
RSG 2		3	100.0%	0	N/A		
RSG 3		0	100.0%	0	N/A		

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 2	Year	2014	Date	Q2 2014
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0	N/A	0	N/A		
BA 2		0	N/A	0	N/A		
RSG 1		17	100.0%	1	100.0%		
RSG 2		3	100.0%	N/A			
RSG 3		0	100.0%	0	N/A		

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 1	Year	2014	Date	Q1 2014
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		1	100.0%	0	N/A		
BA 2		0	N/A	0	N/A		
RSG 1		9	100.0%	1	100.0%		
RSG 2		5	100.0%	N/A			
RSG 3		0	100.0%	0	N/A		

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 4	Year	2013	Date	Q4 2013
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0	N/A	0	N/A		
BA 2		0	N/A	0	N/A		
RSG 1		10	100.0%	0	N/A		
RSG 2		1	100.0%	0	N/A		
RSG 3		1	100.0%	0	N/A		

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 3	Year	2013	Date	Q3 2013
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		1	100.0%	0	N/A		
BA 2		0	N/A	0	N/A		
RSG 1		28	100.0%	1	100.0%		
RSG 2		5	100.0%	0	N/A		
RSG 3		0	100.0%	0	N/A		

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 2	Year	2013	Date	Q2 2013
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0	100.0%	0	N/A		
BA 2		1	100.0%	0	N/A		
RSG 1		32	100.0%	1	100.0%		
RSG 2		3	100.0%	N/A			
RSG 3		0	100.0%	0	N/A		

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 1	Year	2013	Date	Q1 2013
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1		0	100.0%	0	NA		
BA 2		0	NA	0	NA		
RSG 1		16	100.0%	0	100.0%		
RSG 2		2	100.0%	NA			
RSG 3		0	100.0%	0	NA		

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 4	Year	2012	Date	Q4 2012
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1			1	100.0%	0	NA	
BA 2			0	NA	0	NA	
RSG 1			15	100.0%	0	NA	
RSG 2			4	100.0%	NA	NA	
RSG 3			0	100.0%	0	NA	

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 3	Year	2012	Date	Q3 2012
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1			0	100.0%	0	N/A	
BA 2			1	100.0%	0	N/A	
RSG 1			22	100.0%	1	100.0%	
RSG 2			4	100.0%	NA	NA	
RSG 3			1	100.0%	0	N/A	

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 2	Year	2012	Date	#####
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1			1	100.0%	0	N/A	
BA 2			0	100.0%	0	N/A	
RSG 1			19	100.0%	0	N/A	
RSG 2			4	100.0%	0	N/A	
RSG 3			0	100.0%	0	N/A	

**Disturbance Control Standard**

Region	WECC	Qtr	Quarter 1	Year	2012	Date	#####
Control Area		Disturbance Control Standard					
		Reportable Disturbances <= the most severe single contingency			Disturbances > the most severe single contingency		
		Number	Average Percent Recovery	Number	Average Percent Recovery		
BA 1			1	100.0%	0	N/A	
BA 2			0	100.0%	0	N/A	
RSG 1			18	100.0%	0	N/A	
RSG 2			3	100.0%	1	N/A	
RSG 3			0	100.0%	0	N/A	

Date	Required	Actual
10/1/2014	7444	25947
10/8/2014	7856	21877
10/15/2014	7613	27139
10/22/2014	7603	25225
10/29/2014	7616	26739
11/5/2014	7575	23337
11/12/2014	7835	20729
11/19/2014	7605	21877
11/26/2014	7802	25460
12/3/2014	9044	20940
12/10/2014	7846	23818
12/17/2014	8071	21868
12/24/2014	7568	28362
12/31/2014	8855	21682
1/7/2015	8030	22748
1/14/2015	8030	20967
1/21/2015	8021	21067
1/28/2015	7719	21604
2/4/2015	7649	19999
2/11/2015	8287	21048
2/18/2015	7656	20809
2/25/2015	7713	22004
3/4/2015	7910	19254
3/11/2015	7391	21874
3/18/2015	7357	23701
3/25/2015	7620	20113
4/1/2015	7507	23207
4/8/2015	7221	23120
4/15/2015	7528	24266
4/22/2015	7243	25996
4/29/2015	7665	28454
5/6/2015	8065	25480
5/13/2015	7248	26005
5/20/2015	7317	24942
5/27/2015	7535	26270
6/3/2015	7856	27519
6/10/2015	8676	27645
6/17/2015	9269	26834
6/24/2015	9585	27295
7/1/2015	10623	28599
7/8/2015	9038	27603
7/15/2015	9432	28563
7/22/2015	9259	28254
7/29/2015	9996	20520
8/5/2015	9822	23861
8/12/2015	9795	20591
8/19/2015	9755	22133
8/26/2015	9906	20253
9/2/2015	8938	24114
9/9/2015	9996	22562
9/16/2015	8222	23058
9/23/2015	8672	19282
9/30/2015	8779	20358
10/7/2015	7839	22444
10/14/2015	8631	23106
10/21/2015	7661	22295
10/28/2015	7718	22488
11/4/2015	7738	21680
11/11/2015	7764	22145
11/18/2015	7892	21886
11/25/2015	7998	22763
12/2/2015	7788	20436
12/9/2015	7551	23801
12/16/2015	8724	21007
12/23/2015	7851	24438
12/30/2015	8016	20652
1/6/2016	7723	20228
1/13/2016	8292	24138
1/20/2016	8112	22752
1/27/2016	7910	21695
2/3/2016	8372	20289
2/10/2016	7804	22575
2/17/2016	7687	24618
2/24/2016	7815	21308
3/2/2016	7741	21277
3/9/2016	7698	18456
3/16/2016	7620	20582
3/23/2016	7380	20930
3/30/2016	7297	19120
4/6/2016	7422	20087
4/13/2016	7108	20712
4/20/2016	7564	21246
4/27/2016	7200	18860
5/4/2016	7488	18559
5/11/2016	7519	19464
5/18/2016	7705	21673
5/25/2016	7268	23489
6/1/2016	7689	20963
6/8/2016	9127	24308
6/15/2016	8041	22077
6/22/2016	9635	19056
6/29/2016	10234	20598
7/6/2016	9191	22691
7/13/2016	9575	21014
7/20/2016	9926	22382
7/27/2016	10847	20295
8/3/2016	9821	21592
8/10/2016	9181	22244
8/17/2016	10386	21372
8/24/2016	9375	22033
8/31/2016	9526	23394

