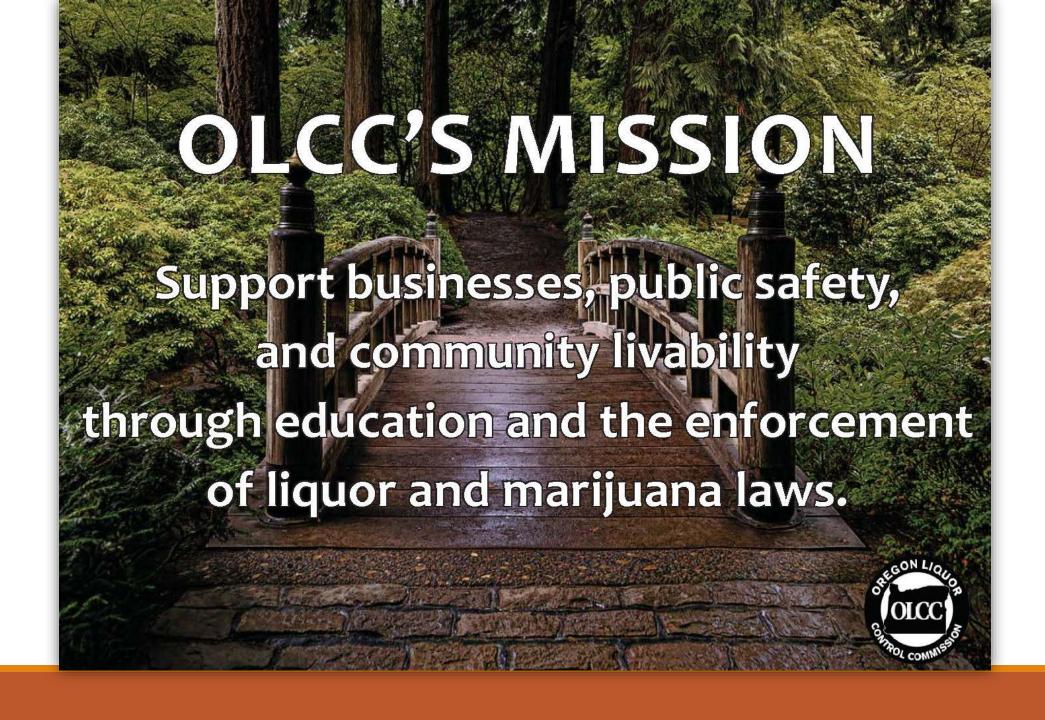
OREGON LIQUOR CONTROL COMMISSION

PRESENTATION TO WAYS AND MEANS SUBCOMMITTEE ON TRANSPORTATION AND ECONOMIC DEVELOPMENT

STEVEN MARKS, EXECUTIVE DIRECTOR MARCH 29, 30 AND APRIL 3, 2017



"Alcohol production is a value-added industry with a geographic spread across the state impacting agricultural production, equipment manufacturing and marketing services...outpaced job growth in software industry"

Senior state economist, Josh Lehner

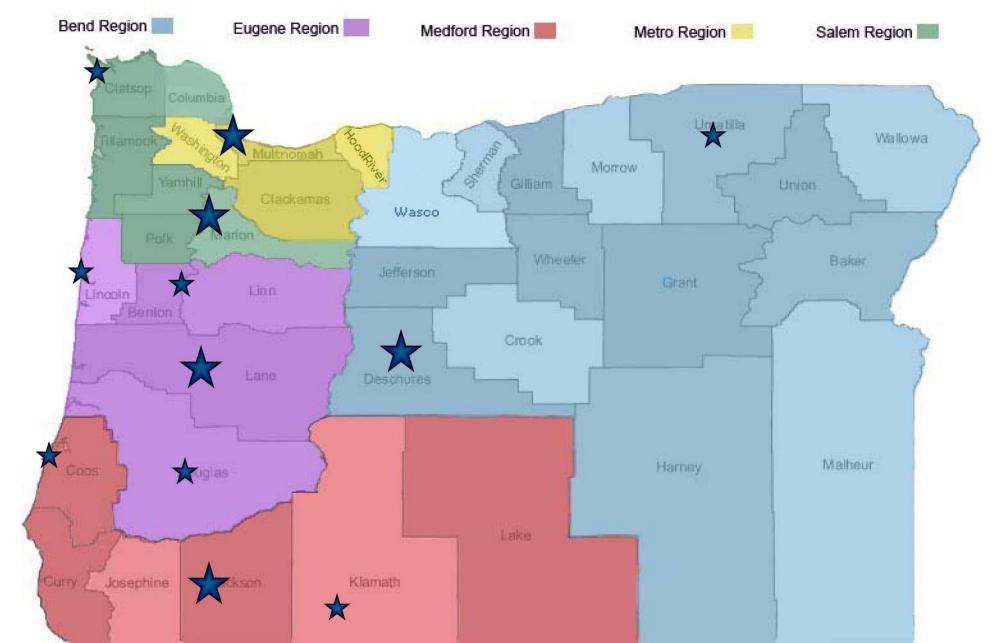
OVERVIEW

- Third largest generator of public funds after income tax and lottery
- Centrally purchase, warehouse and distribute bottled distilled spirits to OLCC-appointed retail sales agents
- Appoint and manage contracts for retail sales agents 254 locations open, growing to around 310 over the next two years with retail expansion process
- License, regulate and enforce alcohol and marijuana production and sales
- Issue alcohol service permits and marijuana worker permits
- Implement the bottle bill and approve redemption centers

OREGON LIQUOR CONTROL ACT AND CANNABIS REGULATION

- ORS 471 Alcoholic Liquor Generally
- ORS 473 Wine, Cider and Malt Beverage Privilege Tax
- ORS 474 Trade Practices Related to Malt Beverages
- ORS 459A.700 to 740 Beverage Containers, the Bottle Bill
- ORS 475B Cannabis Regulation
- Administrative Rules Chapter 845

OLCC STATEWIDE OFFICES



2015-17 INITIATIVES & CHALLENGES

Alcohol Initiatives & Challenges

- Install conveyor system to increase shipping capacity
- Complete roof replacement
- Initiate regional retail liquor expansion
- Develop online alcohol licensing system
- Share resources to implement marijuana program

Results

- Conveyor system operational July 2016, managed 11% biennial growth
- Roof replacement to be completed this Spring
- Approved 20 new retail liquor outlets
- Online Alcohol Licensing System Phase 1 (service permits) is scheduled for Q1 2018
- Alcohol enforcement and minor decoy operations decreased, days to license increased

2015-17 INITIATIVES & CHALLENGES

Marijuana – Initiatives & Challenges

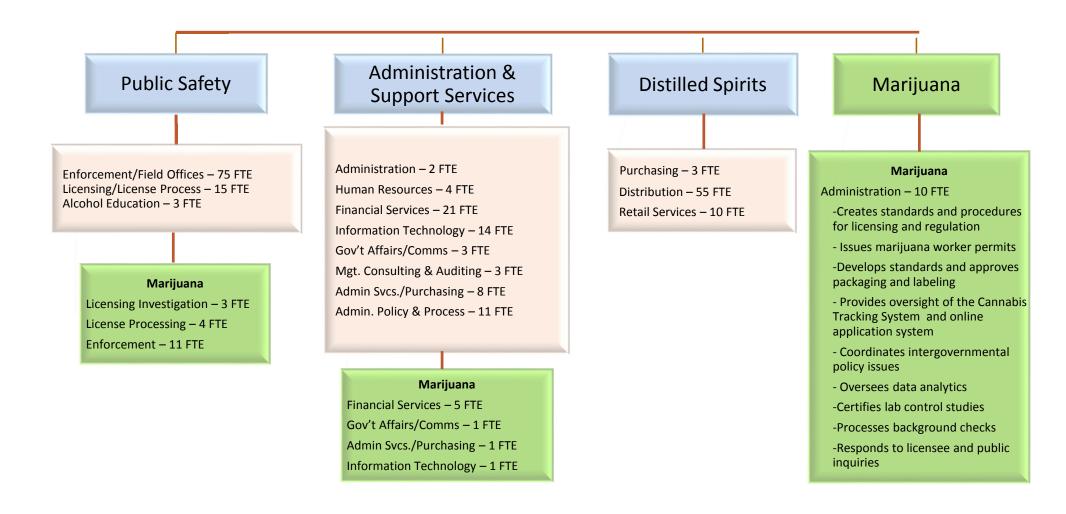
- Develop and deploy three major IT projects
- Rule development –implementing statutory changes, interagency coordination, public outreach
- Program start up space planning, hire and train employees, develop procedures and processes
- Process and approve licenses
 - 1,000 applications forecasted
 - 2,287 applications received
- License renewals begin in April requires substantial compliance review
- Identified compliance concerns requires field investigation

Results

- Deployed online Marijuana License,
 Marijuana Worker Permit, and Cannabis
 Tracking systems, but needs refinement
- Rulemaking continues as industry evolves and statutes change
- 1,052 licenses approved; however, ongoing use of alcohol licensing and marijuana enforcement staff to process licenses is unsustainable
- Compliance, enforcement, and renewals requires significant staff time

OLCC ORGANIZATIONAL STRUCTURE

2017-19



OLCC'S PROGRAMS

- Distilled Spirits
- Public Safety
- Administration & Support Services
- Marijuana



DISTILLED SPIRITS PROGRAM

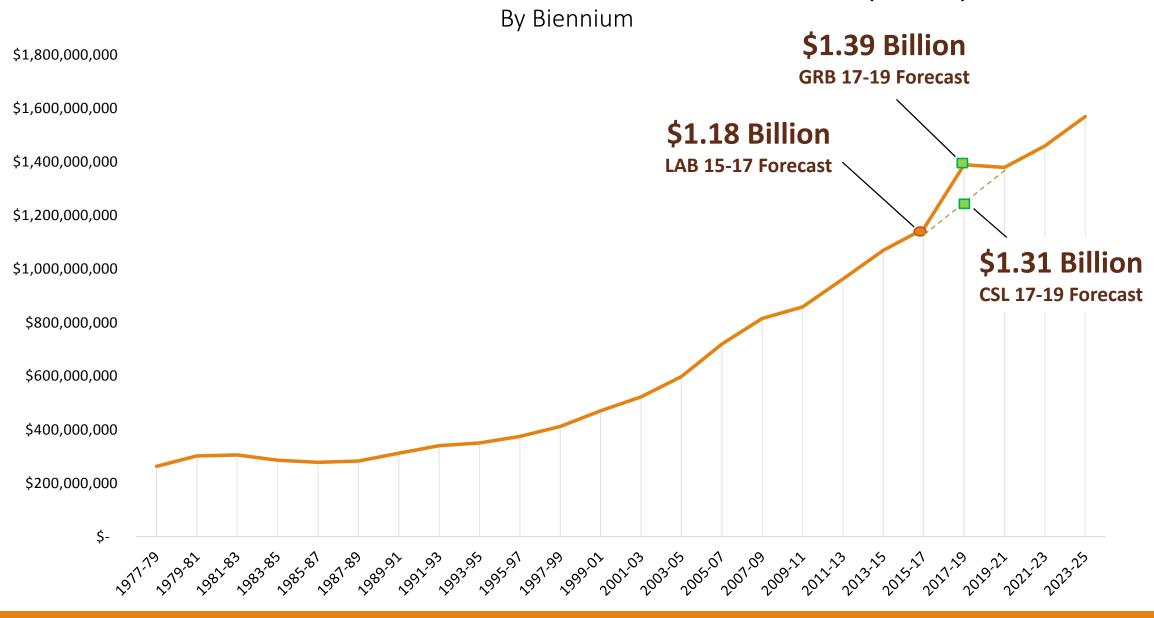
- Centrally purchases, receives, stores, and distributes distilled spirits statewide
- Issues and oversees contracts with liquor stores and distillery agents
- Provides retail liquor store support, training, and merchandising expertise
- Ensures adequate, appropriate inventories and varied selection of liquor products are available to meet customer demand
- Maintains liquor price quotes from suppliers
- Develops and educates agent store operating requirements and procedures

DISTILLED SPIRITS PROGRAM

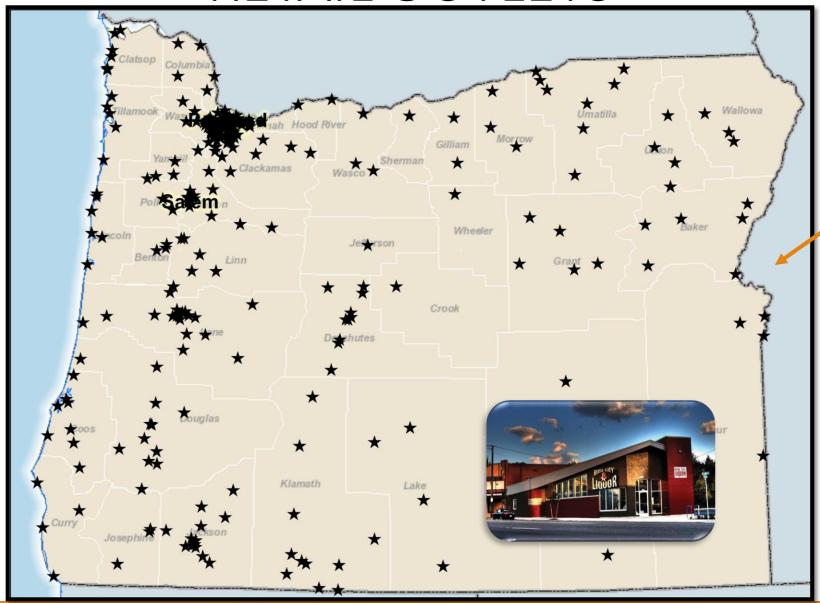
Goals for 2017-19

- Continue retail expansion and support existing retail outlets to ensure customer convenience, provide for modernization of shopping experience and meet demand of Oregon's growing population
- Expand the number of retail outlets from 254 operating locations to around 310 over the next two years
- Increase business analysis and data usage to identify expansion opportunities, gain efficiencies and increase revenue
- Ensure OLCC keeps pace with rapid growth of distilleries and distillery retail outlets
- Facilitate limited local distillery transfers to local retail agents
- Optimize operation of new conveyor system for order fulfillment and stock replenishment

FORECAST OF GROSS LIQUOR SALES (GRB)



RETAIL OUTLETS



254 operating retail locations

2016-17 RETAIL EXPANSION



DISTILLED SPIRITS PROGRAM RETAIL EXPANSION

GRB POLICY OPTION PACKAGE #101

Overview

- Liquor stores are contracted by the OLCC to provide retail outlets for distilled spirits throughout the state
- During the 1980's the ratio of outlets to population was 1:12,000
- During 2016, a retail expansion was launched, anticipating growth from 248 outlets to 310 by the end of the 17-19 biennium
- In addition, Oregon has seen tremendous growth in distillery outlets; sales have grown at an average rate of 41% per year since inception in 2009

Rationale for Request

- Expansion of liquor stores and distillery agents creates stress on OLCC resources to effectively manage, supply, and account for state liquor inventory
- District managers currently cover approximately 50 existing liquor stores each, not including distillery agents. Retail expansion is projected to add an additional 12 stores per district manager
- The additional store coverage is more labor intensive due to assistance with opening brand new stores and training brand new agents

Governor's Recommended Budget

- The addition of one District Manager will accommodate some of the growth in liquor and distillery outlets
- The addition of a Business Analyst will assist with evaluating the markets and proposals for the expansion

PUBLIC SAFETY AND LICENSING PROGRAM

- Approves license applications and renewals for bars, restaurants, retail stores, distributors, wineries, breweries, distillers, marijuana growers, processors, wholesalers, retailers, and labs
- Enforces liquor and marijuana laws (premises visits, minor decoy, violations, cooperate with local law enforcement)
- Issues alcohol server and marijuana worker permits
- Investigates citizen and local government complaints/concerns
- Works with licensees to achieve compliance through education
- Writes violations and assists in preparing and representing cases at administrative hearings for licensee and server/worker permit violations

AVERAGE DAYS TO PROCESS ALCOHOL LICENSE APPLICATIONS KPM

Average days to process marijuana license – proposed KPM



ALCOHOL RATE OF SECOND VIOLATION KPM

Percent of licensees that received a second violation within two years of the first.



ALCOHOL MINOR DECOY COMPLIANCE RATE KPM

Marijuana minor decoy compliance – proposed KPM



PUBLIC SAFETY AND LICENSING PROGRAM

Goals for 2017-19

- Prioritize enforcement for both alcohol and marijuana programs
- Increase decoy activity for sales to minors and compliant sales of medical grade marijuana
- Increase licensee visits to prevent serious violations (education)
- Continue to integrate marijuana activities into overall public safety program
- Coordinate field office activities and compliance outcomes to assure statewide consistency
- Increase accountability through consistent records management

ALCOHOL LICENSES & PERMITS

Total Annual Liquor Licenses	15,300
Restaurants and Bars (On-premises licenses)	7,400
Grocery/Convenience Stores (Off-premises licenses)	4,780
Wineries	1,110
Brewers/Brew Pubs	330
Distributors/Wholesalers	1,400
Distilleries (29 secondary locations)	96

Special Event Licenses	8,900
Out-of-state certificates	3,298
Alcohol Service Permits	157,600

Totals as of January 2017

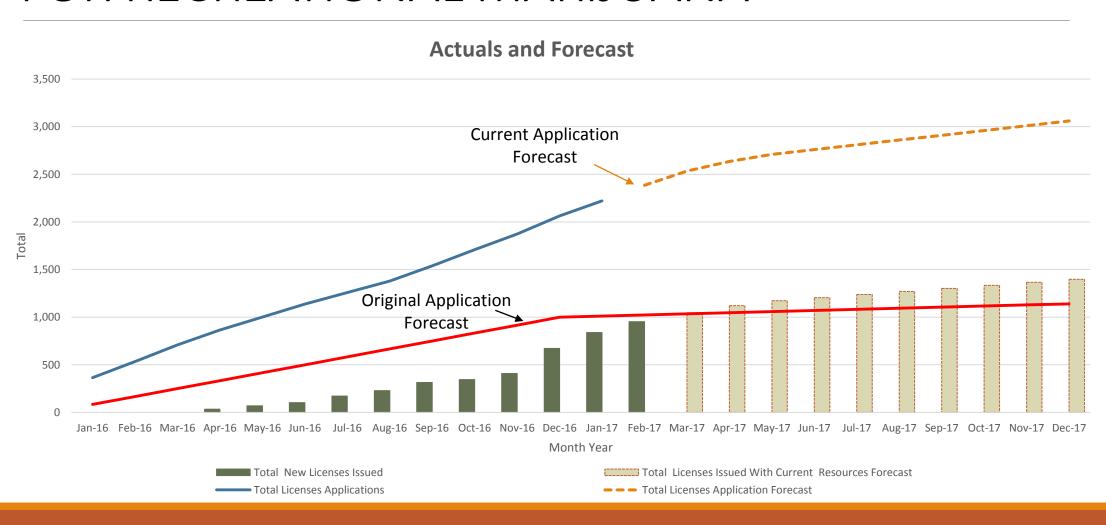
MARIJUANA LICENSES & PERMITS

	Active and Approved Licenses	Applications For Licenses Yet to Be Processed	2015-17 Forecast of Active Licenses	Updated Forecast of Active Licenses for 2017-19
Laboratory	19	5	5	19
Processor	86	190	120	200
Producer	481	756	330	941
Retailer	398	200	310	468
Wholesaler	68	82	65	115
Research	0	2	0	1
License Total	1,052	1,235	830	1,744

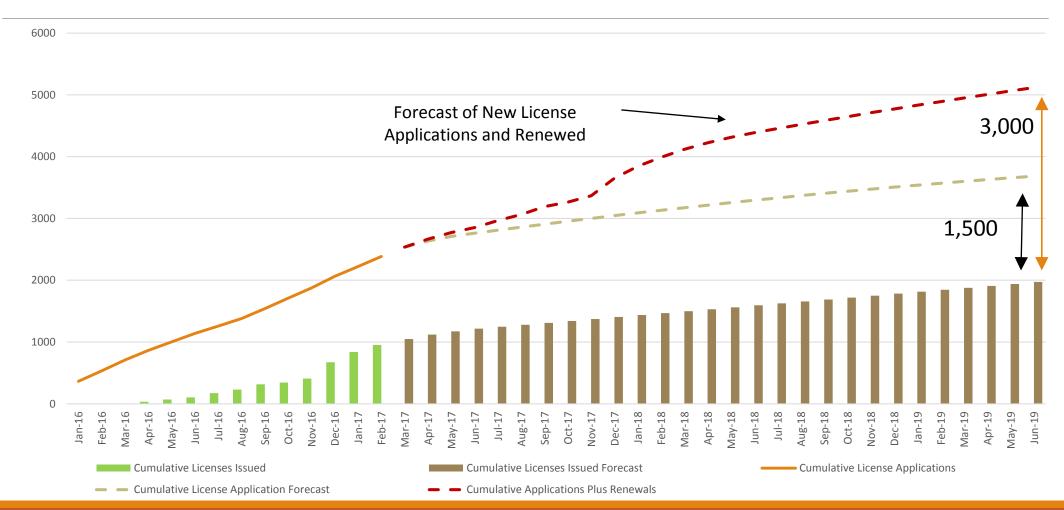
	Active and Approved Permits	Application for Permits Yet to Be Processed	2015-17 Forecast of Active Permits	Forecast of Approved Permits in 2017-19
Worker Permits	12,439	1,542	6,200	29,000

Totals as of March 23, 2017

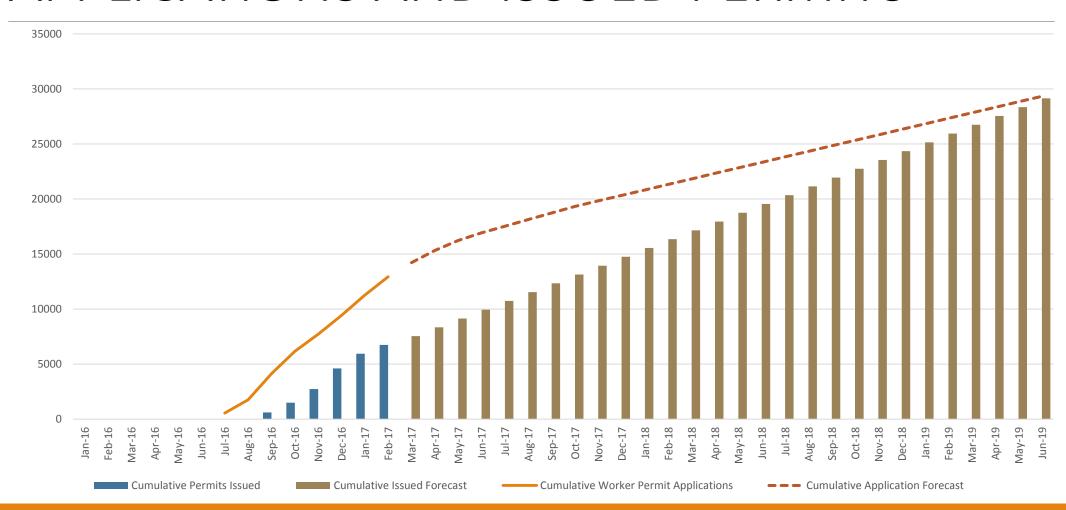
TOTAL APPLICATIONS AND ISSUED LICENSES FOR RECREATIONAL MARIJUANA



2017-19 APPLICATIONS, RENEWALS, AND ISSUED LICENSES FOR RECREATIONAL MARIJUANA



2017-19 MARIJUANA WORKER PERMIT APPLICATIONS AND ISSUED PERMITS



MARIJUANA COMPLIANCE CONCERNS

- 1,200 more applications than expected and growing daily
- Grower licenses are particularly complicated, biggest license category, often remote, more likely to change operational practices, greatest risk of diversion
- Marijuana enforcement is evolving
 - Market incentive to divert and invert product illegally
 - Packaging and labeling oversight
 - Potential need to seize and store product while waiting for administrative hearing (secure storage space, product degradation, and potential destruction)
 - New classes of cases such as destruct orders for failed testing
 - Product recalls
- Managing difficult legal issues unique to marijuana for which there are no established law enforcement protocols

PREVENTION AND COMPLIANCE APPROACH

Security Requirements

Cameras, alarms, back up videos, transportation manifests

Cannabis Tracking System

- Packaging created without identifying the source of the package or harvest 260
- Improper transfers 58
- Retailers not reporting sales timely 103
- Weight mismatches 159
- Monitoring sales to possession limits 140

Field Enforcement

- Proactive discovery through routine inspections and analysis of Cannabis Tracking System data
- Responding to complaints and investigating reports of criminal activity and administrative violations
- Coordinate with local governments and local law enforcement to prevent and identify violations

MARIJUANA PROGRAM STAFF FULFILLMENT

GRB POLICY OPTION PACKAGE # 406

Overview

- About 33% of all the producer licenses are expected to be in SW Oregon
- The majority of those are large outdoor grow operations which are the most complex to license and regulate

Rationale for Request

• There are not enough regulatory specialists in the Medford region to provide enforcement resources for this higher density area of licensees

Governor's Recommended Budget

Add one Regulatory Specialist to cover some of the increased enforcement needs

LIMITED DURATION POSITION CONVERSION

GRB POLICY OPTION PACKAGE #307

Overview

- The Compliance Specialist 3 position in Administrative Policy & Process was granted on limited duration related to an expected need for additional hearings and potential adjudication related to rejection of marijuana license and worker permit applications during the start-up 2015-17 biennium
- This position has learned statute related to new marijuana laws and developed rules for marijuana regulation
- This expertise is a permanent part of the agency and will continue to fill an ongoing need as the marijuana program develops and stabilizes

Rationale for Request

• As the Marijuana Program implementation continues, it has become apparent that the number of marijuana license applications is greater than originally estimated and is not slowing down

Governor's Recommended Budget

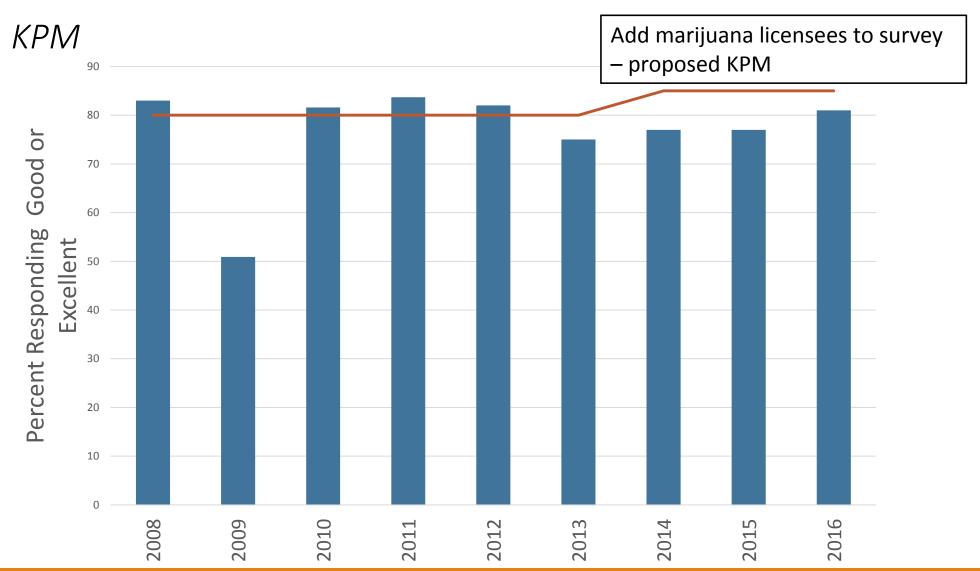
 Continue this limited duration position for the 2017-19 biennium in order to fill the ongoing needs of the marijuana program

INTEGRATED ADMINISTRATION & SUPPORT SERVICES

- Administration, including Human Resources
 - Provides executive leadership; implements policy
 - Recruits and trains statewide
 - Oversees of labor contract
- Administrative Policy and Process
 - Represents agency for hearings/contested cases
 - Conducts rulemaking
 - Administers Oregon's Bottle Bill, sites Redemption Centers
- Financial Services
 - Collects spirits revenue, beer and wine taxes, and liquor/marijuana license fees
 - Pays all liquor, freight, and vendor invoices
 - Audits liquor stores, retail marijuana sales, and agency financial processes
 - Distributes revenue

- Government Affairs/Communications
 - Legislative coordination
 - Central communication link between OLCC and its external stakeholders, the media, and the general public
- Information Technology
 - Oversees all I.T. infrastructure including the programs that operate the OLCC warehouse, alcohol/marijuana licensing and enforcement divisions
- Management and Administrative Services
 - Oversees purchasing and manages agency policies
 - Provides research and analytics including KPMs
 - Oversees internal auditing

CUSTOMER SERVICE SATISFACTION RATES



ADMINISTRATION & SUPPORT SERVICES

Goals for 2017-19

- Continue IT planning, coordination and implementation of agency-wide IT infrastructure for current and future operations
 - Eliminate duplicative data entry and manual processing of paper
 - Build and improve online electronic systems to enhance customer service and back office functionality
 - Create electronic hub to connect existing agency systems to share data efficiently
- Continue to streamline business operations and processes for alcohol and marijuana programs
- Increase communication with licensees, agents, public, and local governments
- Create facility plan to accommodate growth in distilled spirits and marijuana program

IT COORDINATION

Current

- Complete Phase 1 online liquor license application system (service permits)
- Complete Phase 2 online liquor license application system (licensees)
- Add administrative functionality to online marijuana application system
- Add additional features to cannabis tracking system

Future

- Electronic privilege tax filing
- Electronics records management system
- Computer aided dispatch with Oregon State Police
- Data warehouse
- Field mobility program (electronic access and input of licensee and enforcement information)
- Connect, improve or maintain Merchandising Business System (distilled spirits product replenishment, orders, distribution, accounting); Robocom Inventory Management System, Oregon Liquor Agent Services Website (OLAS), Daily Sales and Inventory System (DS&I), Oregon Liquor Search, Power Builder (license renewal, server education, cashier, case tracker (rudimentary processing), iEnforce (remote access to licensee information), Highview (digitize and store license application documents)

LEGISLATION

HB 2150 Electronic Privilege Tax Filing

 Directs Oregon Liquor Control Commission to develop system to allow manufacturers or importing distributors of wine, cider or malt beverages to file required statements and pay privilege taxes by electronic means

HB 2203 Marijuana Tax Distribution

 Potential amendment creates quarterly distribution of marijuana tax proceeds to cities and counties, requiring quarterly certification from cities and counties to validate their opt-in status for six license types which is required to determine eligibility for marijuana tax proceeds

MARIJUANA PROGRAM

- Facilitates licensing and worker permit process (screens applications, tracks down missing information, answers questions, coordinates medical inventory transfer, coordinates with ODA
- Analyzes Cannabis Tracking System (CTS) data (proactive education, referral to investigate staff, statewide data compilation and reports)
- Prepares educational bulletins and notices to prevent compliance issues
- Coordinates with ODA, OHA, DOR on interagency agreements, joint investigations, and successful flow of information
- Coordinates with outside vendors Metrc and NIC/USA on the CTS and online license application system, and performing updates and improvements
- Coordinates with local government on land use compatibility statements, approved and/or denied
 applications and on licensee local jurisdiction code violations
- Approves all packaging and labels for medical and recreational marijuana products

MARIJUANA PROGRAM

Goals for 2017-19

- Analyze CTS data for statewide trends, compliance issues and actions, and to proactively get licensees into compliance through education
- Improve online licensing system to contain more features for internal and external use, tracking of aggregate and individualized data, and smooth the license assignment process statewide
- Provide ongoing development and distribution of educational materials and training for licensees
- Provide ongoing statewide training of staff on changing rules, statutes, processes and policies
- Coordinate public information requests, create reports, public educational materials
 - 3.9 million web visitors, 1.7 million FAQ, 30,000 business readiness guide, 29,000 Gov Delivery, 275 public records requests
- Coordinate with states on best practices
- Continue interagency coordination and policy development

LEGISLATION

HB 2198 OMMP and Recreational Marijuana Program Consolidation

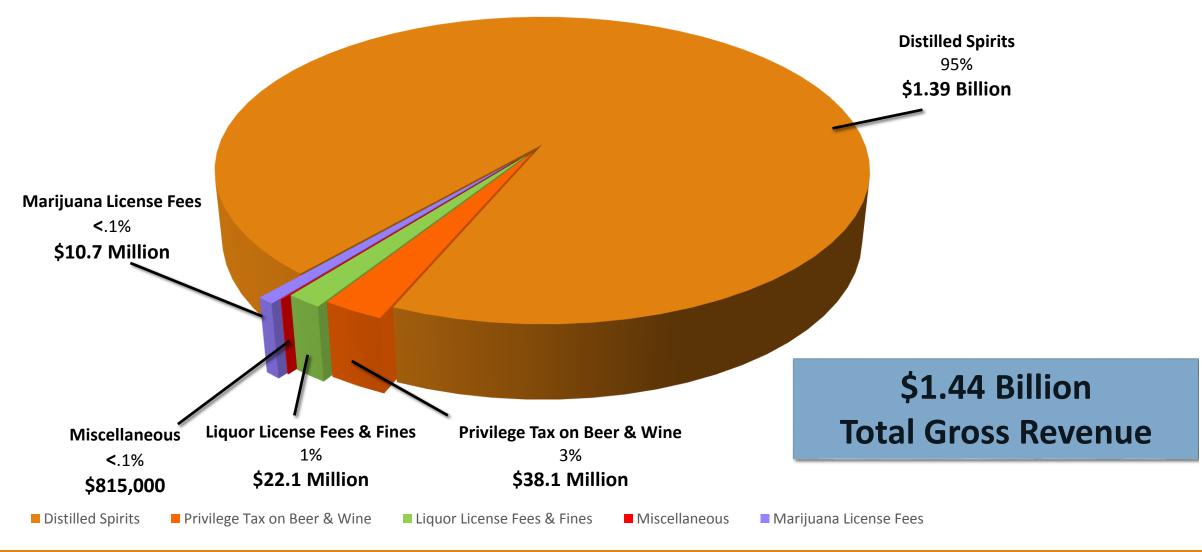
- Changes name to Oregon Liquor Control and Cannabis Commission
- Combines OMMP and Recreational Program into OLCCC up to 9,000 new licensees
- OLCCC licenses and regulates all growers over personal medical grow exemption, all processors, wholesalers, and retailers
- OMMP regulates and issues medical cards
- OLCCC sets standards for labeling and dosage
- Creates Cannabis Advisory Committee within OLCCC and Medical Use of Cannabis Board within OHA

Includes technical provisions to clarify authorities, sanction ability, and other matters vital to efficient OLCC operations

AGENCY FINANCIAL INFORMATION

PROJECTED GROSS REVENUE SOURCES

2017-2019 BIENNIUM (GRB)



GRB REVENUES OVER CSL

Surcharge - \$36.6 million general fund

 The current 50-cent per bottle surcharge has been extended through June 30, 2019 (\$36.5 million); GRB has proposed an additional surcharge of 50 cents per bottle be added; Surcharge dedicated by legislature to General Fund

Alcohol License fees - \$9.5 million distributed revenue

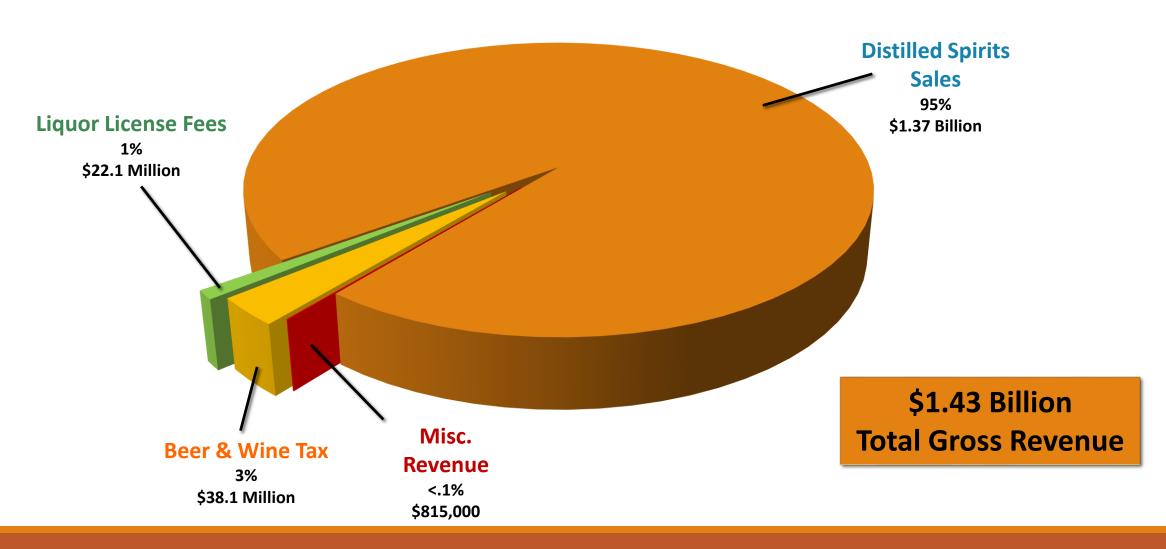
• GRB has proposed a doubling of annual liquor license fees; requires a statute change; ORS 471.311(5); alcohol service permit fees remain the same

3% Revenue Increase due to Retail Expansion - \$38.3 million gross revenue, \$15.8 million distributed revenue

Currently have 254 retail liquor stores operating, target of up to 310 in 2017-19 biennium,
 will require resources to meet forecasted expansion efforts

PROJECTED GROSS ALCOHOL REVENUE SOURCES

2017-2019 BIENNIUM (GRB)



CURRENT DISTILLED SPIRITS MODEL

Based on Average \$17 Bottle Price

5% OLCC Operating Expenses

Includes Enforcement, Licensing, Administration, Distribution functions

1% Bank Card Costs

72% of all purchases made with bank cards

8.93% Liquor Store Operator Commission

Average Liquor Store Operator Compensation

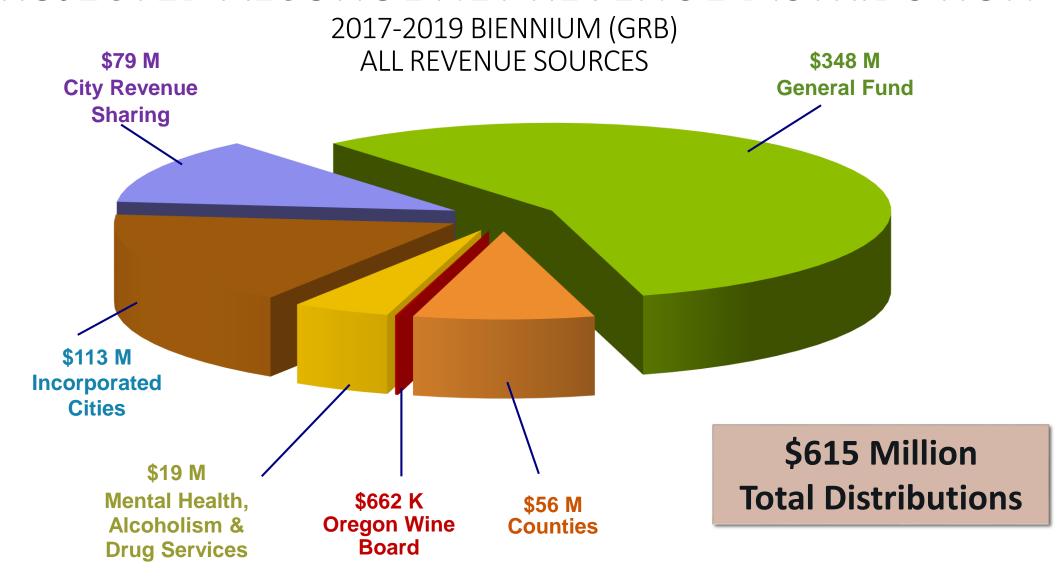
37%

Profit for State,
Cities and Counties

48%

Manufacturer Cost

PROJECTED ALCOHOL NET REVENUE DISTRIBUTION



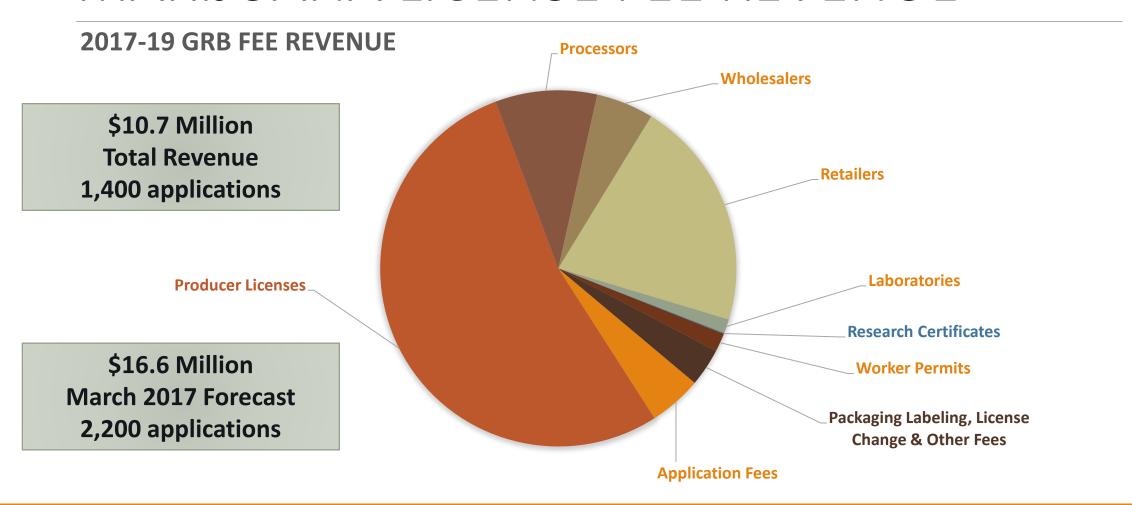
WHERE LIQUOR DOLLARS GO

2013-2015 BIENNIUM (PARTIAL LIST)

Cities	
Astoria	\$271,400
Beaverton	\$2,622,000
Bend	\$2,235,600
Cannon Beach	\$48,400
Clatskanie	\$49,600
Dallas	\$421,100
Eugene	\$4,538,200
Happy Valley	\$447,800
Hillsboro	\$2,666,300
Hermiston	\$489,400
Klamath Falls	\$610,600
Lafayette	\$107,200
Lincoln City	\$234,600
McMinnville	\$925,100
Medford	\$2,161,800
Newport	\$288,000
Oregon City	\$947,000
Portland	\$16,888,300
Pendleton	\$475,600
Roseburg	\$634,100
Salem	\$4,490,800
Scappoose	\$190,300
St. Helens	\$367,400
The Dalles	\$410,600
West Linn	\$723,200

Counties	
Benton	\$865,500
Clackamas	\$3,812,000
Clatsop	\$367,700
Columbia	\$491,400
Deschutes	\$1,608,900
Douglas	\$1,072,600
Gilliam	\$19,200
Hood River	\$230,000
Jackson	\$2,035,600
Josephine	\$816,600
Klamath	\$658,300
Lake	\$78,300
Lane	\$3,512,800
Lincoln	\$459,200
Linn	\$1,171,000
Marion	\$3,186,300
Morrow	\$112,600
Multnomah	\$7,466,000
Polk	\$760,400
Tillamook	\$250,100
Umatilla	\$767,200
Wasco	\$254,500
Washington	\$5,442,200
Wheeler	\$14,100
Yamhill	\$1,000,800

MARIJUANA LICENSE FEE REVENUE



2017-19 MARIJUANA TAX REVENUE COLLECTION AND DISTRIBUTION (\$114.9 MILLION)

Common School Fund	\$46.0 million
Mental Health	\$23.0 million
State Police	\$17.2 million
Counties	\$11.5 million
Cities	\$ 11.5 million
Oregon Health Authority	\$5.7 million

DAS GRB Forecast

LIQUOR AND MARIJUANA BUDGETS

Liquor Governor's Recommended Budget

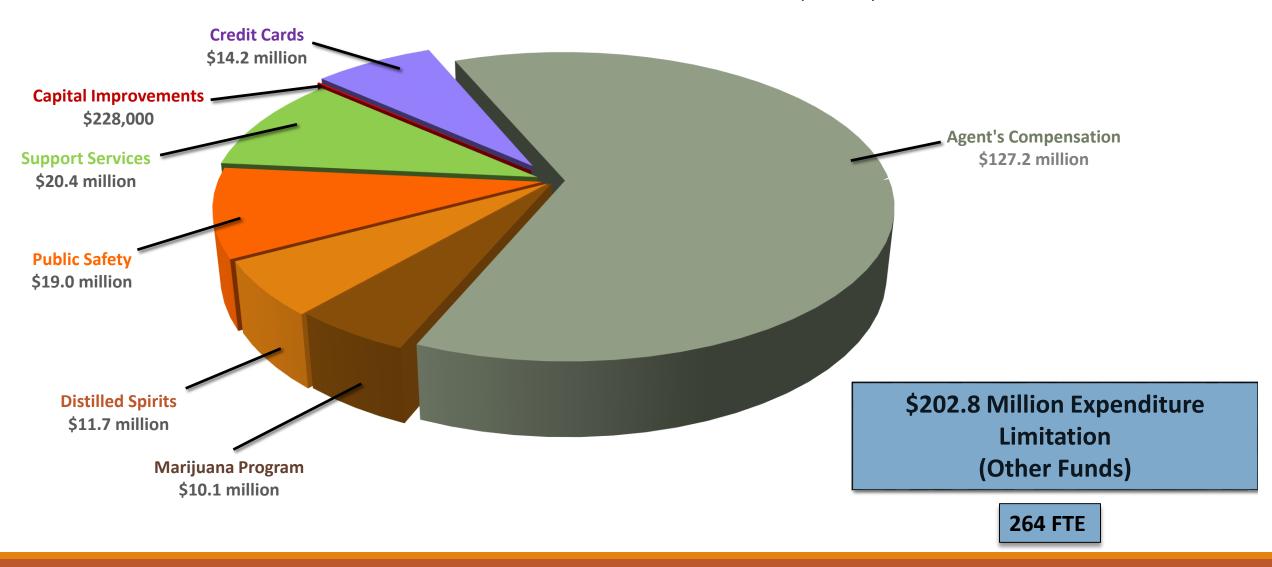
- \$192.7 million for 2017-19
- Pays for:
 - Agents Compensation
 - Operation of the Liquor Distribution Center
 - Credit card fees for liquor sales
 - Liquor Licensing
 - Liquor Enforcement
 - Hearings for liquor law violations
 - Support Services
 - Administration
 - Tax collection for beer and wine
- Excess Revenue Distributed

Marijuana Governor's Recommended Budget

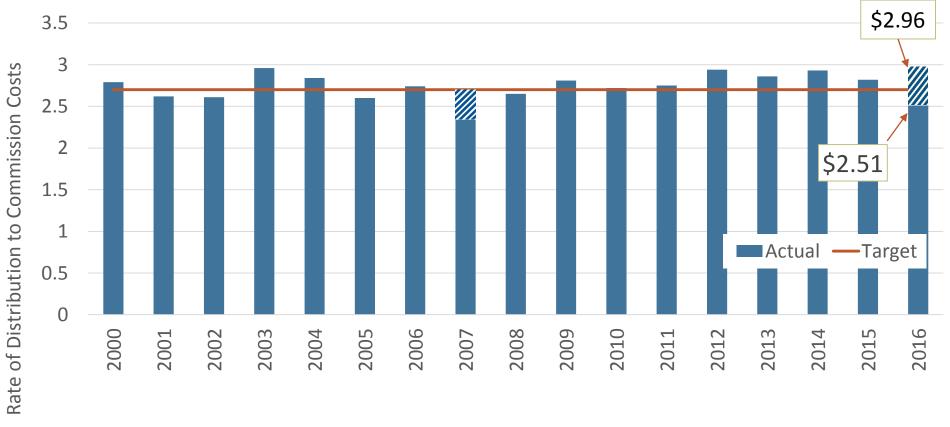
- \$10.1 million for 2017-19
- Pays for:
 - Marijuana Licensing
 - Marijuana Regulation
 - Marijuana Labeling
- Tracking through the Cannabis Tracking System
- Marijuana-related policy development
- Hearings for marijuana law violations
- Excess Revenue Carries Over
 - Fee funded only
 - Licensing fees set to expect program costs
 - License fees are in rule

OLCC BUDGET EXPENDITURES

2017-2019 BIENNIUM (GRB)



REVENUE RETURNED PER DOLLAR SPENT* KPM



*FY 2016 Expenditures Included \$4.9 million investment in a new high through-put conveyor system in the warehouse, \$1.7 million on a new roof for the warehouse, and \$3.4 million in uncompensated Recreational Marijuana Program start-up costs. ROI, excluding one-time expenditure on conveyor and marijuana is \$2.96:\$1.



EXHIBITS

- Alcohol License Fees
- Marijuana License Fees
- OLCC Combined Budget Historical Data

ALCOHOL LICENSE FEES

License Type	t Annual or ily Fee	GRB Proposed Annual or Daily Fee	Total Transactions Forecasted in 2017-19	2017-19 Biennium Revenue Forecast (fees unchanged)	2	2017-19 GRB Revenue Forecast (fees doubled)
Brewery Public House	\$ 250	\$ 500	664	\$ 165,962	\$	331,924
Brewery	\$ 500	\$ 1,000	26	\$ 13,181	\$	26,363
Brewery No Consumption	\$ 500	\$ 1,000	31	\$ 15,578	\$	31,156
Certificate of Approval	\$ 175	\$ 350	344	\$ 60,274	\$	120,549
Distillery	\$ 100	\$ 200	247	\$ 24,685	\$	49,370
Direct Shipper	\$ 50	\$ 100	3,113	\$ 155,659	\$	311,317
Full On-Premises Sales	\$ 400	\$ 800	11,659	\$ 4,663,604	\$	9,327,209
Grower Sales Privilege	\$ 250	\$ 500	29	\$ 7,190	\$	14,380
Grower Sales Privilege No Consumption	\$ 250	\$ 500	65	\$ 16,177	\$	32,354
Limited On-Premises Sales	\$ 200	\$ 400	7,280	\$ 1,455,943	\$	2,911,886
Off Premises Sales	\$ 100	\$ 200	12,269	\$ 1,226,932	\$	2,453,865
Warehouse	\$ 100	\$ 200	93	\$ 9,347	\$	18,693
Wholesale Malt & Wine Distributor	\$ 275	\$ 550	441	\$ 121,268	\$	242,535
Wine Self Distribution	\$ 100	\$ 200	427	\$ 42,659	\$	85,319
Winery	\$ 250	\$ 500	1,160	\$ 290,058	\$	580,116
Winery No Consumption	\$ 250	\$ 500	858	\$ 214,501	\$	429,002
Temporary Sales License Events (per day fees)	\$ 50	\$ 100	9,299	\$ 464,939	\$	929,878
Special Event Winery License (per day fees)	\$ 10	\$ 20	18,353	\$ 183,531	\$	367,062
Late Fees (average late fee)	\$ 93	\$ 186	3,161	\$ 294,109.17	\$	588,218.33
			Total Revenue	\$ 9,425,597	\$	18,851,194

MARIJUANA LICENSE FEES

Marijuana Fee Type	Current Fee Amount
Application Fee for Initial License or Certificate	\$250
Annual Marijuana Producers License Tier I (large grower)	\$3,750
Annual Marijuana Producers License Tier 2 (large grower	\$5,750
Annual Micro Tier 1 Producers (small grower)	\$1,000
Annual Micro Tier 2 Producer (small grower)	\$2,000
Annual Marijuana Processor License	\$4,750
Annual Marijuana Wholesaler License	\$4,750
Annual Marijuana Retailer License	\$4,750
Annual Marijuana Laboratory License	\$4,750
Research Certificate (three year term)	\$4,750
Marijuana Handler Permit (five year term)	\$100
Additional Criminal Background Check	\$50
Change of Ownership Review	\$1,000
Change of Business Structure Review	\$1,000
Transfer of Location of Premises Review	\$1,000
Packaging Preapproval fee	\$100
Labeling Preapproval Fee	\$100
Late Renewal Fee for license if received less than 20 days before expiration date	\$150
Late Renewal Fee for license if received after expiration date	\$300
Late Renewal Fee for handler permit if received less than 20 days before expiration	\$50
Late Renewal Fee for handler permit received after expiration date	\$100

OLCC COMBINED BUDGET HISTORICAL DATA

Oregon Liquor Control Commission – Alcohol and Marijuana						
	2013-15 Actuals	*2015-17 Leg. Approved	-17 Leg. Approved 2017-19 CSL			
General Fund	-	-	-	-		
Lottery Funds	-	-	-	-		
Other Funds	\$151,072,708	\$174,669,013	\$187,715,691	\$202,793,906		
Other Funds Non-Limited	-	-	ı	-		
Federal Funds	-	_	_	-		
Federal Funds Non-Limited	-	-	-	-		
Total Funds	\$151,072,708	\$174,669,013	\$187,715,691	\$202,793,906		
Positions	234	268	263	266		
FTE	226.47	255.33	261.00	264.00		
	*includes Emergency Board and administrative actions through December 2016					