

# MAINE STATE LEGISLATURE

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June 25, 2025

The Honorable Matthea Elisabeth Larsen Daughtry, President  
MAINE STATE SENATE  
3 State House Station  
Augusta, Maine 04333

The Honorable Ryan Fecteau, Speaker  
MAINE HOUSE OF REPRESENTATIVES  
2 State House Station  
Augusta, Maine 04333

The Honorable Mark Lawrence, Senate Chair  
The Honorable Melanie F. Sachs, House Chair  
COMMITTEE ON ENERGY, UTILITIES AND TECHNOLOGY  
100 State House Station  
Augusta, Maine 04333

Re: *2023/2024 Attorney General Report Under the Petroleum Market Share Act*

Dear President Daughtry, Speaker Fecteau, Senator Lawrence, and Representative Sachs:

I am pleased to submit the enclosed report in accordance with the Petroleum Market Share Act (PMSA), 10 M.R.S.A. § 1677, which requires the Attorney General to report to the Legislature regarding the concentration of retail motor fuel oil and home heating oil outlets in the State. The report is based on data collected from wholesalers and includes maps depicting relative concentration in designated markets throughout the State. This report is also available on the Attorney General's [website](#). The report includes a recommendation to repeal certain provisions of the PMSA.

Sincerely,

A handwritten signature in blue ink that reads "Aaron M. Frey".  
Aaron M. Frey  
Attorney General

Enclosure

cc: Suzanne Gresser, Executive Director, Maine State Legislature  
Jessica Lundgren, Director, Maine State Law and Legis. Reference Library  
Charles E. Summers, Jr., Pres. & CEO, Maine Energy Marketers Association

**STATE OF MAINE  
OFFICE OF THE ATTORNEY GENERAL**

**Aaron M. Frey  
Attorney General**



**PETROLEUM MARKET SHARE ACT**

**Report to the Legislature Pursuant to 10 M.R.S.A. § 1677  
for the Reporting Period June 1, 2023 – May 31, 2024**

**Retail Petroleum Outlets Concentration**  
**10 M.R.S.A. § 1677**  
**June 2025**

**I. INTRODUCTION**

This report is provided by the Attorney General to the Legislature pursuant to the Petroleum Market Share Act<sup>1</sup> (“PMSA”). As required by the PMSA, the report describes the concentration of retail petroleum outlets in Maine, subject to the limitations and reservations stated herein. The concentration levels described in this report reflect conditions in Maine based on data through May 2024. The PMSA also requires the Attorney General to make “a recommendation to the Legislature as to whether additional legislation is needed to further limit or curtail the activity of refiners operating retail outlets.” As described in more detail in section III, we recommend that the PMSA be repealed in part.

This report focuses on markets for home heating oil and motor fuel oil. In general, the geography of petroleum markets is local. In the case of home heating oil, the market may encompass an urban area or a segment of a county. Motor fuel oil markets tend to be smaller, in some instances limited to a single neighborhood or one side of a busy street. Nevertheless, for continuity purposes, our analyses retain the longstanding geographic markets developed by the Attorney General in the 1990s, when the PMSA reporting first began. The State is divided into 33 home heating oil markets and Maine’s 16 counties are used as the motor fuel oil markets.

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<sup>1</sup> 10 M.R.S.A. § 1677.

The Attorney General receives data annually from home heating oil and motor fuel oil wholesalers indicating the annual gallons supplied to home heating oil and motor fuel oil retailers located in Maine. For the purpose of this report, we rely on that data to determine the number of retail competitors and their percentage market shares within the pre-defined geographic markets.<sup>2</sup> Those shares, in turn, allow us to calculate the concentration of the markets using a concentration index widely used by federal and state antitrust agencies to assess competitive conditions (usually in the context of proposed mergers and acquisitions). The Appendices to this report show the concentration levels and corresponding maps depicting those levels for each pre-defined market. For comparison purposes, the tables in the Appendices also show concentration numbers for the same markets for the past ten years.

Importantly, the market concentration levels described in this report are only as accurate as the data on which we rely. We routinely identify inconsistencies and gaps in the data. We also do not receive data pertaining to retailers based in other states (*i.e.* New Hampshire) that deliver to retail customers in Maine. Moreover, because data about the wholesale market does not necessarily correspond to conditions in the retail market, the determinations in this report should be viewed as, at best, general approximations of the concentration within these pre-defined markets.

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<sup>2</sup> It should be noted that the Attorney General does not receive retail or wholesale price information under the PMSA. Moreover, the data collected from individual wholesalers, which is confidential by statute, is aggregated and not identifiable by wholesaler or retailer in this report. 10 M.R.S.A. §§ 1673, 1675, 1677.

Ultimately, it may be the case that a market identified as not concentrated in this report is in fact highly concentrated, or vice versa.

## **II. LEVELS OF CONCENTRATION**

### **A. Methodology**

The methodology employed by the Attorney General to assess levels of concentration in Maine's retail petroleum markets, as reflected in this report, is essentially the same methodology used by the U.S. Department of Justice, the Federal Trade Commission, and other state Attorneys General in evaluating the legality of a given merger or acquisition under applicable antitrust law. The Attorney General has employed a similar analysis enforcing Maine's merger law for decades.<sup>3</sup> The most important factor affecting competition in a particular market is the level of concentration, which is determined by considering the number of competitors and the size of their market shares.

**1. Market Definition.** The first step in a concentration analysis is to determine the relevant product and geographic markets. This report focusses on two product markets, home heating oil and motor fuel oil. Home heating oil is defined as “#2 fuel oil sold for heating residential, industrial or commercial space or water.”<sup>4</sup> Motor fuel oil “means internal combustion fuel sold for use in motor vehicles,” as more fully defined in 29-A M.R.S.A. § 101(42).<sup>5</sup>

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<sup>3</sup> 10 M.R.S.A. § 1102-A.

<sup>4</sup> 10 M.R.S.A. § 1672(3).

<sup>5</sup> 10 M.R.S.A. § 1672(4).

As to geographic markets, for the purposes of this report, we are not looking to identify the geographic area within which two merging companies operate, as we would if we were reviewing a merger. Rather, we are attempting to obtain a very broad snapshot of competition in the petroleum industry and trends within pre-defined geographic markets and across the entire state based exclusively on wholesale data.

The Attorney General has taken different approaches to defining geographic markets for home heating oil and for motor fuel oil. In preparing the initial reports under the PMSA, we conducted a series of interviews with people knowledgeable in the petroleum industry in Maine. On that basis, with respect to home heating oil markets, we divided the state into 33 separate geographic markets intended to approximate economic and competitive circumstances relative to home heating oil sales. With respect to motor fuel oil markets, we use county-wide markets. We have retained the original geographic markets to be able to compare concentration trends over time within consistent geographic areas.

Importantly, these geographic market depictions are not used to analyze individual mergers or acquisitions in Maine. Each individual merger or acquisition proposal involves an evaluation of the unique competitive and economic circumstances in the areas within which both companies operate. Indeed, given the inconsistencies we have seen in the wholesale data over the years, we do not rely on it in evaluating the likely competitive effects of a given merger. Instead, when there appears to be the potential for reduced



competition due to a merger, we prioritize collecting data directly from retailers within the relevant geographic area. Through this process, we have discovered that wholesale data reported to us under the PMSA is often not informative with respect to retail markets.

**2. Herfindahl-Hirschman Index.** Market concentration is a well-accepted tool for evaluating competitiveness within identified markets. As a general rule, the fewer the competitors, and the higher those competitors' market shares, the more concentrated (and less competitive) the market. Federal and state antitrust agencies (including the Maine Attorney General) employ the Herfindahl-Hirschman Index ("HHI") to measure market concentration.<sup>6</sup> The HHI concentration index is arrived at by summing the squares of the market shares of each competitor in a market. This simple mathematical device expresses the insight that market power increases exponentially in proportion to market share. Federal antitrust guidelines used by the Attorney General in merger enforcement provide that a market with an index over 1800 is considered highly concentrated.<sup>7</sup> A market in the highly concentrated category is subject to a high degree of market power, unless the effects of high concentration are mitigated by other factors, such as ease of entry for a new competitor.

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<sup>6</sup> DOJ/FTC 2023 Merger Guidelines (available at <https://www.justice.gov/atr/merger-guidelines>).

<sup>7</sup> For example, a market comprising five firms with market shares of 20% each would yield an index of 2000 (20 squared x 5).

For the purpose of this report, our analysis of levels of concentration in motor fuel oil markets tracks the current federal threshold of above 1800 points for identifying markets where there may be substantial competitive concerns, with additional tiers of concentration to assess more subtle year-over-year changes in concentration and for ease of comparison due to the historic use of those tiers. Thus, for motor fuel oil, an index below 500 is “unconcentrated,” 500-999 is “moderately concentrated,” and 1000-1800 is “highly concentrated.” Markets above 1800 points are referred to as “extremely concentrated.”

Our designated home heating oil market thresholds are significantly higher, largely tracking the categories reflected in the previous federal merger guidelines.<sup>8</sup> Thus, a home heating oil market with an index below 1500 is “unconcentrated,” 1500-2499 is “moderately concentrated,” and 2500-5000 is “highly concentrated.” In addition to the former federal benchmarks, the Attorney General deems markets above 5000 points to be “extremely concentrated.”

Appendix A lists the geographic markets within which we measure concentration for both home heating oil and motor fuel oil. The home heating oil markets map depicts by color coding the relative concentrations in the 33 designated home heating oil geographic markets, based on the latest analysis of data from wholesalers. The motor fuel oil markets map depicts by the same

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<sup>8</sup> USDOJ/FTC Horizontal Merger Guidelines (rev. ed. 2010 available at <https://www.justice.gov/atr/file/810276/dl?inline>). We have kept these thresholds for year over year comparison purposes.

color coding the relative concentrations based on the latest analysis of countywide motor fuel markets. Again, these geographic market depictions are not used to analyze individual mergers or acquisitions in Maine. The tables in Appendix B contain the latest HHI concentration analyses within both home heating oil and motor fuel oil markets, as well as concentration comparisons in those markets over the last ten reporting years.

### **B. Overview – Retail Home Heating Oil Markets.**

Based only on data we have received from wholesalers, and not on any data from retailers regarding sales, concentration levels in Maine's home heating oil markets appear to have remained relatively consistent, with some notable exceptions. We note that some variations from last year's report are due to corrections and adjustments made to prior years' data and therefore may not reflect changed market conditions.

The home heating oil markets centered around Augusta, Ellsworth, Pittsfield/Newport, and Biddeford/Saco appear to be the most competitive. Moderately concentrated markets include those centered around: Bangor; Belfast; Lewiston/Auburn; Bath/Brunswick; Portland; Bridgton; Gray; Sanford and York. The most concentrated, or least competitive, areas are Mount Desert Island, Jay, Bethel, and Jackman/Greenville.

The most striking example of a shift in relative concentration is in York, which has moved from extremely concentrated to the much more competitive moderately concentrated category. We do not have an explanation for the significant shifts in concentration in this market.

### **C. Overview - Retail Motor Fuel Oil Markets.**

The concentration levels for the countywide motor fuel oil markets have not shifted significantly since the last report, although we do observe an overall general trend of increasing concentration levels with one notable exception. According to the wholesale data we received, Knox County appears to have become significantly more competitive. We do not have an explanation as to why this has occurred and do not opine as to whether the observation is reliable.

Four counties are extremely concentrated: Lincoln, Oxford, Piscataquis, and Washington, with Piscataquis being the only one that was also extremely concentrated in our previous report. Knox has moved from extremely to highly concentrated. Only Kennebec and Sagadahoc earned the most competitive designation based on the most recent data, compared to four counties in that category in the prior report.

### **III. RECOMMENDATION**

The Attorney General is required to recommend whether additional legislation is needed to further limit or curtail the activity of refiners operating retail outlets.

The central purpose of the PMSA is to provide the Attorney General with the ability to monitor levels of concentration in Maine's retail markets on an annual basis. The perception that this monitoring is advisable and necessary arose out of a concern that a refiner or refiners could use the advantage

conferred by vertical integration<sup>9</sup> to stake out a dominant position in Maine’s retail petroleum markets, whether through a program of aggressive marketing, acquisitions, or otherwise. The PMSA was adopted as a moderate alternative to so-called “divorcement” legislation, which would have barred refiners from Maine’s retail petroleum markets altogether.

Refiner retail operations in Maine have long been and remain extremely limited in both home heating oil and motor fuel oil.<sup>10</sup> Refiners with a presence in Maine have enjoyed no more than 1% of retail HHO sales in Maine and no more than 5% of retail MFO sales since at least 2020. For that reason, we do not recommend any additional legislation to address refiner retail operations.

However, we do recommend that parts of the PMSA be repealed. The wholesale data reporting obligation was intended to enable the Attorney General to monitor, assess, and report on market conditions in the retail petroleum industry across the State. Having collected and analyzed the data for many years, we now conclude that the concentration levels identified in our reports are only the crudest of proxies for competitive market conditions around the State. The wholesale data is simply not a reliable basis to state with confidence that the competitive landscape we describe with our concentration calculations reflects actual market conditions.

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<sup>9</sup> A vertically integrated refiner enjoys two principal advantages over non-integrated competitors in retail petroleum markets. First, the refiner is not susceptible to the vagaries of wholesale markets and may to a certain extent exercise control or influence over wholesale markets; second, the refiner can pass along to its retail arm any economies realized in upstream phases of its integrated operations.

<sup>10</sup> Although previous reports have indicated no refiner retail operations in the state, the extremely limited retail operations noted in this report lead to the same conclusion. Currently, as in recent years, no refiner occupies a dominant position in any retail market.

Although we have indicated in prior reports that the data can be useful as a starting point for merger analyses, it is not a reliable substitute for retail data specific to a given geographic market where merging retailers operate. In recent years, we have dedicated more resources to refining the data and filling in gaps we identify as we look to the reported data as a starting point for a merger review. This exercise has revealed that we cannot rely on wholesale data for any given merger.<sup>11</sup> Thus, we now routinely request data from all businesses selling home heating oil or motor fuel oil at retail in the relevant region when we are reviewing a proposed acquisition. Helpfully, because of recent legislative amendments to 10 M.R.S.A. § 1109, we now have 90 days to review the proposed acquisition of a home heating oil or motor fuel oil retail business, which facilitates a more thorough review based on retailer data and renders the wholesaler data we receive under the PSMA effectively obsolete for purposes of merger reviews.

We therefore recommend that the Legislature repeal the following provisions of the PMSA, which relate to wholesale data reporting: Sections 1673(1) and 1677.

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<sup>11</sup> For example, for some geographic markets we have received wholesale data showing zero gallons for retailers that, based on actual retail sales data, are in fact top competitors in those markets. On other occasions, the undercount or overcount of gallons has been in the hundreds of thousands.

## **APPENDIX A**

### **HHO MARKETS**

1. St. John Valley
2. Ashland/Presque Isle
3. Houlton
4. Lincoln
5. Woodland/Calais
6. Cherryfield/Machias
7. Old Town
8. Ellsworth
9. Bangor
10. Dover-Foxcroft
11. Pittsfield/Newport
12. Belfast
13. Rockland
14. Mid Coast
15. Augusta
16. Waterville
17. Skowhegan
18. Jackman/Greenville
19. Farmington
20. Jay
21. Lewiston/Auburn
22. Bath/Brunswick
23. Portland
24. Gray
25. Paris
26. Rumford/Rangeley
27. Bethel
28. Bridgton
29. Limerick
30. Sanford
31. Biddeford/Saco
32. York
33. Mt. Desert

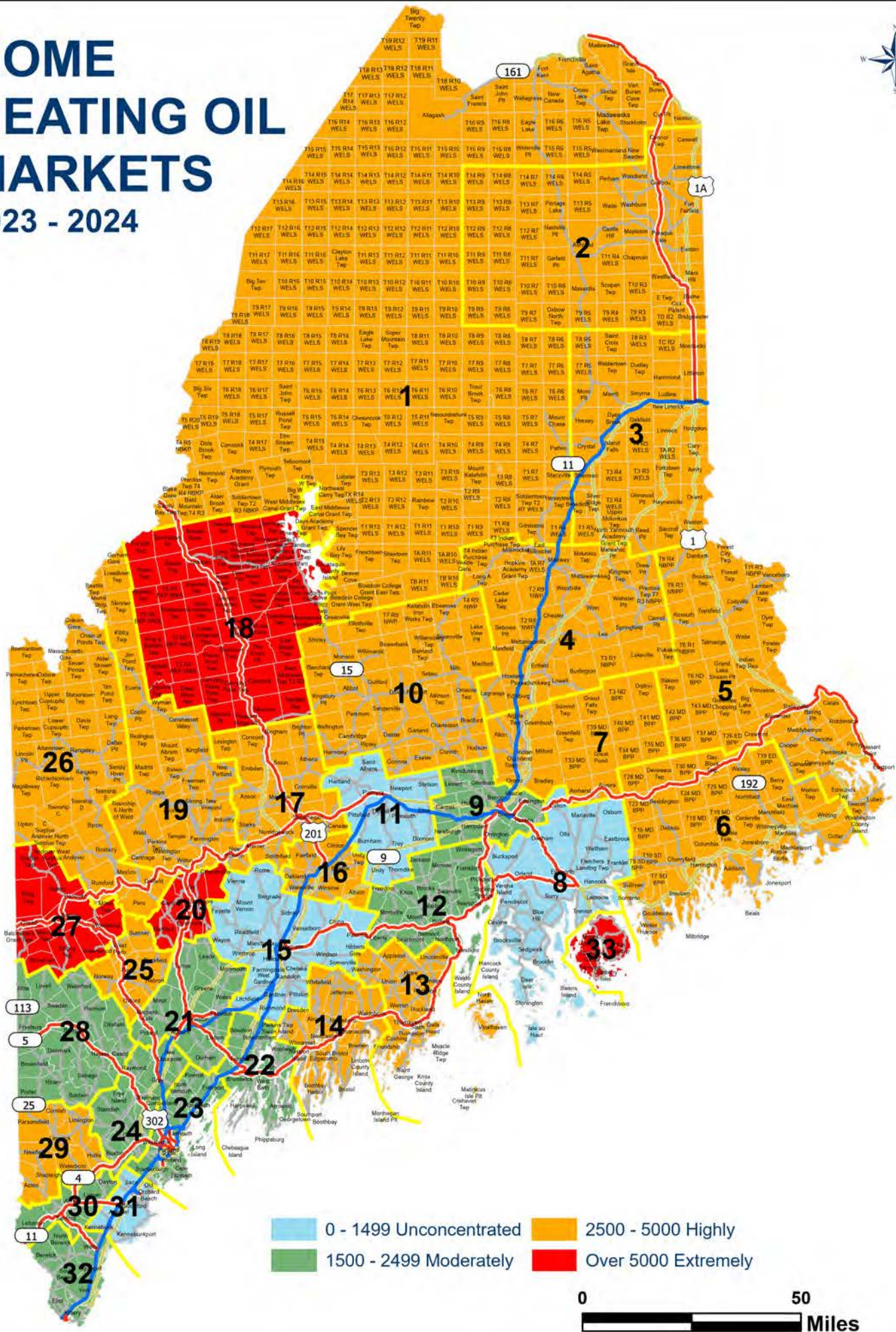
### **MFO MARKETS**

Androscoggin  
Aroostook  
Cumberland  
Franklin  
Hancock  
Kennebec  
Knox  
Lincoln  
Oxford  
Penobscot  
Piscataquis  
Sagadahoc  
Somerset  
Waldo  
Washington  
York



# HOME HEATING OIL MARKETS

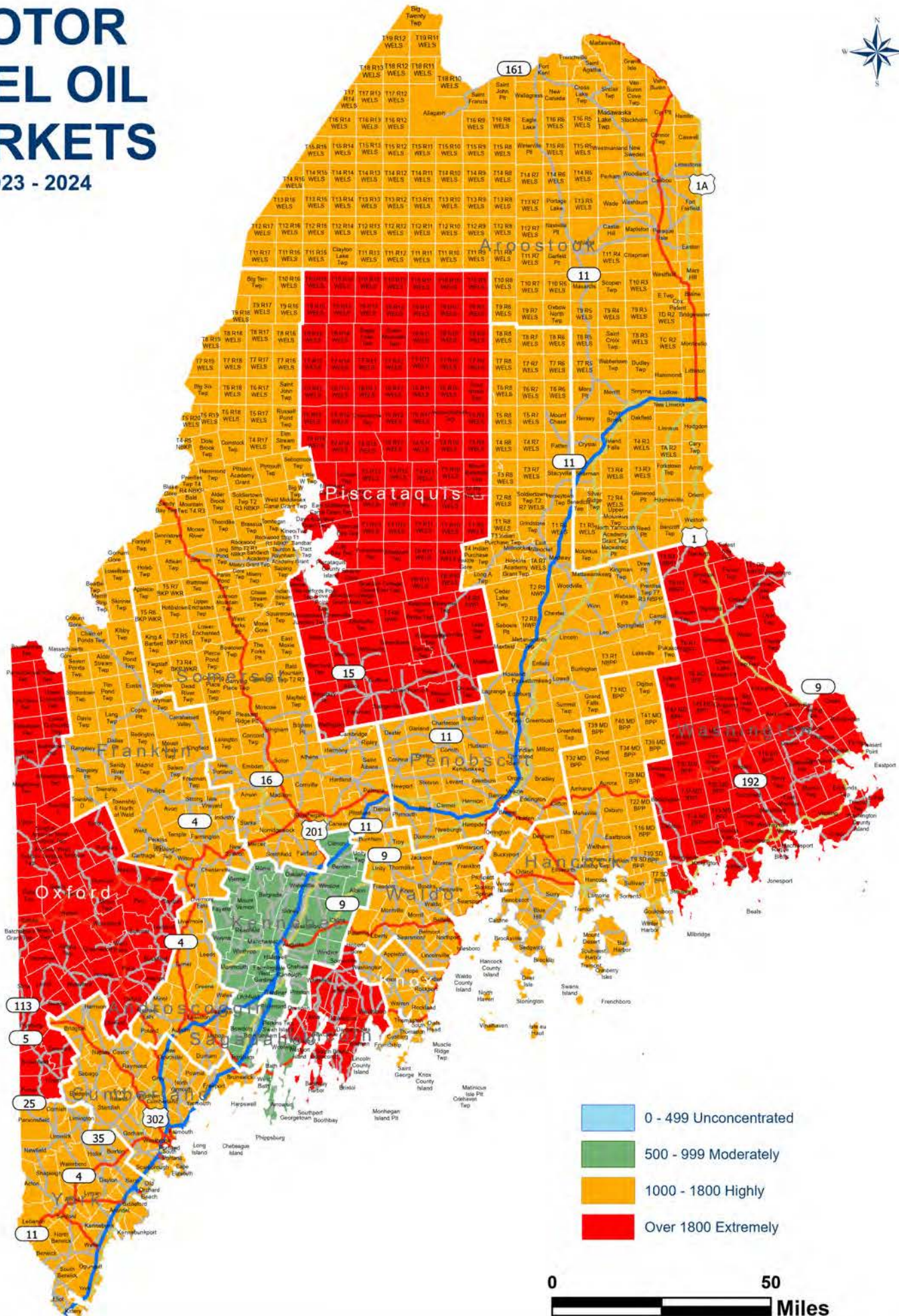
## 2023 - 2024





# MOTOR FUEL OIL MARKETS

2023 - 2024



- 0 - 499 Unconcentrated
- 500 - 999 Moderately
- 1000 - 1800 Highly
- Over 1800 Extremely



## **APPENDIX B**

### **HHI DATA TABLES**

#### **HHO & MFO Concentration by Market Area 2014 to 2024**

| HHO MARKET CONCENTRATION<br>Home Heating Oil by HHO Market |           |           |           |           |           |           |               |           |           |  |
|--|-----------|-----------|-----------|-----------|-----------|-----------|---------------|-----------|-----------|--|
| Market Area  | 2014-2015 | 2015-2016 | 2016-2017 | 2017-2018 | 2018-2019 | 2019-2020 | 2021-2022 rev | 2022-2023 | 2023-2024 |  |
| 01. St. John Valley  | 3434      | 3242      | 3391      | 3455      | 3764      | 4526      | 3314          | 4076      | 3533      |  |
| 02. Ashland /Presque Isle                                  | 3348      | 3351      | 3751      | 3808      | 3760      | 3786      | 3558          | 3147      | 3697      |  |
| 03. Houlton  | 3725      | 3168      | 3194      | 4092      | 3542      | 3032      | 3729          | 3599      | 2724      |  |
| 04. Lincoln  | 1584      | 1490      | 1316      | 1593      | 1877      | 1848      | 1820          | 1898      | 2508      |  |
| 05. Woodland /Calais                                       | 3071      | 3154      | 3103      | 2821      | 2752      | 2845      | 3022          | 3256      | 3873      |  |
| 06. Cherryfield / Machias                                  | 2444      | 2625      | 2012      | 2544      | 3238      | 2886      | 4209          | 5478      | 4344      |  |
| 07. Old Town   | 1564      | 3822      | 4439      | 1952      | 2159      | 2180      | 2085          | 2625      | 2706      |  |
| 08. Ellsworth  | 1536      | 1487      | 1446      | 1817      | 1874      | 1911      | 1812          | 1584      | 1455      |  |
| 09. Bangor   | 1063      | 1741      | 1538      | 1831      | 1582      | 1645      | 1978          | 1302      | 1701      |  |
| 10. Dover-Foxcroft   | 3791      | 2819      | 3242      | 3399      | 3168      | 3395      | 3842          | 4016      | 3962      |  |
| 11. Pittsfield / Newport                                   | 3687      | 1947      | 2172      | 2394      | 2458      | 1917      | 1657          | 1537      | 1434      |  |
| 12. Belfast  | 1398      | 1007      | 1486      | 1109      | 1227      | 1441      | 1347          | 1118      | 1912      |  |
| 13. Rockland   | 1721      | 2647      | 2157      | 2104      | 2109      | 1745      | 1939          | 4722      | 2523      |  |
| 14. Midcoast   | 3163      | 2755      | 1972      | 1880      | 2319      | 2789      | 4007          | 3514      | 4186      |  |
| 15. Augusta  | 857       | 911       | 850       | 1370      | 1392      | 1257      | 1297          | 1300      | 877       |  |
| 16. Waterville   | 1950      | 2231      | 2275      | 2311      | 2528      | 2516      | 2351          | 4310      | 3925      |  |
| 17. Skowhegan  | 2162      | 2525      | 2688      | 2724      | 2789      | 2827      | 4351          | 4606      | 4293      |  |
| 18. Jackman /Greenville                                    | 8681      | 8002      | 8214      | 8305      | 8797      | 9036      | 5035          | 10000     | 10000     |  |
| 19. Farmington   | 2702      | 1654      | 2404      | 2110      | 2288      | 2311      | 2951          | 2540      | 2701      |  |
| 20. Jay  | 5190      | 3282      | 4137      | 4436      | 4544      | 4674      | 4798          | 4298      | 6969      |  |
| 21. Lewiston /Auburn                                       | 2212      | 2247      | 1574      | 1553      | 1693      | 1698      | 1700          | 1582      | 1878      |  |
| 22. Bath / Brunswick                                       | 2258      | 2214      | 2138      | 1918      | 1788      | 1617      | 2138          | 1995      | 1730      |  |
| 23. Portland   | 1772      | 1520      | 1250      | 1186      | 1567      | 1449      | 1484          | 1744      | 1899      |  |
| 24. Gray   | 3061      | 3429      | 4043      | 2018      | 1511      | 1948      | 1358          | 1994      | 1578      |  |
| 25. South Paris  | 3982      | 3492      | 3498      | 3532      | 3483      | 3330      | 2769          | 3367      | 4579      |  |
| 26. Rumford /Rangeley                                      | 1541      | 2565      | 2638      | 2016      | 1999      | 2319      | 2605          | 3351      | 3904      |  |
| 27. Bethel   | 8022      | 10000     | 10000     | 10000     | 10000     | 10000     | 10000         | 10000     | 10000     |  |
| 28. Bridgton   | 2297      | 1182      | 1132      | 1936      | 1570      | 2492      | 2541          | 2906      | 2270      |  |
| 29. Limerick   | 2760      | 2237      | 2813      | 2543      | 2567      | 2259      | 2959          | 2516      | 3508      |  |
| 30. Sanford  | 2999      | 3377      | 3191      | 2485      | 2557      | 2633      | 2409          | 1933      | 2027      |  |
| 31. Biddeford /Saco  | 1204      | 1601      | 1236      | 915       | 805       | 727       | 821           | 786       | 929       |  |
| 32. York   | 7654      | 4428      | 5420      | 5071      | 9050      | 4356      | 5137          | 6881      | 2450      |  |
| 33. Mt. Desert   | 3635      | 3030      | 2714      | 3554      | 3215      | 3054      | 6842          | 6337      | 5338      |  |
|  |           |           |           |           |           |           |               |           |           |  |
| HHI  |           |           |           |           |           |           |               |           |           |  |
| 0 - 1499   |           |           |           |           |           |           |               |           |           |  |
| 1500 - 2499  |           |           |           |           |           |           |               |           |           |  |
| 2500 - 5000  |           |           |           |           |           |           |               |           |           |  |
| over 5000  |           |           |           |           |           |           |               |           |           |  |
|  |           |           |           |           |           |           |               |           |           |  |
|  |           |           |           |           |           |           |               |           |           |  |

This document was prepared with data and information provided by wholesalers. The Attorney General does not verify the accuracy of volumes or retail locations.

| MFO MARKET CONCENTRATION<br>Motor Fuel Oil by County |                      |           |           |           |           |           |           |           |               |           |
|--|----------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|---------------|-----------|
| Market Area  | 2014-2015            | 2015-2016 | 2016-2017 | 2017-2018 | 2018-2019 | 2019-2020 | 2020-2021 | 2021-2022 | 2022-2023 rev | 2023-2024 |
| Androscoggin   | 872                  | 1399      | 989       | 1528      | 1119      | 1742      | 1000      | 1017      | 1301          | 1184      |
| Aroostook  | 1021                 | 1301      | 1480      | 1642      | 1479      | 1366      | 1681      | 1684      | 1620          | 1708      |
| Cumberland   | 644                  | 1103      | 748       | 874       | 1116      | 1080      | 780       | 873       | 1062          | 1346      |
| Franklin   | 874                  | 819       | 840       | 944       | 953       | 990       | 828       | 726       | 822           | 1111      |
| Hancock  | 640                  | 925       | 915       | 830       | 850       | 916       | 888       | 680       | 969           | 1105      |
| Kennebec   | 768                  | 895       | 889       | 1093      | 1051      | 753       | 739       | 675       | 963           | 990       |
| Knox   | 2279                 | 2417      | 2319      | 3102      | 3129      | 2611      | 2813      | 2996      | 2559          | 1441      |
| Lincoln  | 762                  | 1966      | 1459      | 1579      | 1435      | 1466      | 1552      | 1163      | 1484          | 2168      |
| Oxford   | 1702                 | 2012      | 1815      | 1995      | 2095      | 2645      | 1876      | 2059      | 1734          | 2440      |
| Penobscot  | 824                  | 1148      | 959       | 1045      | 1059      | 1354      | 820       | 1149      | 1051          | 1182      |
| Piscataquis  | 3387                 | 5516      | 5599      | 3038      | 2949      | 4430      | 3301      | 3717      | 3739          | 3650      |
| Sagadahoc  | 992                  | 1027      | 929       | 966       | 978       | 920       | 919       | 802       | 1016          | 978       |
| Somerset   | 577                  | 1576      | 1314      | 1097      | 1099      | 1112      | 981       | 805       | 990           | 1046      |
| Waldo  | 590                  | 1461      | 1125      | 1200      | 1148      | 1061      | 1474      | 1315      | 1799          | 1682      |
| Washington   | 610                  | 1455      | 1299      | 1222      | 1180      | 1474      | 1288      | 1089      | 1672          | 2156      |
| York   | 768                  | 1135      | 1058      | 871       | 851       | 795       | 648       | 908       | 1081          | 1228      |
|  |                      |           |           |           |           |           |           |           |               |           |
|  |                      |           |           |           |           |           |           |           |               |           |
| <b>HHI</b>   | <b>Concentration</b> |           |           |           |           |           |           |           |               |           |
| 0 - 499  | Unconcentrated       |           |           |           |           |           |           |           |               |           |
| 500 - 999  | Moderately           |           |           |           |           |           |           |           |               |           |
| 1000 - 1800  | Highly               |           |           |           |           |           |           |           |               |           |
| over 1800  | Extreme              |           |           |           |           |           |           |           |               |           |
|  |                      |           |           |           |           |           |           |           |               |           |
|  |                      |           |           |           |           |           |           |           |               |           |

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