

In the Matter of Salary Arbitration Between:

Lars Eller

-And-

Montreal Canadiens

Brief of: Montreal Canadiens (Club)

Team 31

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PART I – OVERVIEW

Pursuant to Article 12.9 of the NHL Collective Bargaining Agreement,¹ this brief represents the position of the Montreal Canadiens (the “Club” or “Canadiens”) in the arbitration hearing of Lars Eller (“Eller”). The analysis below will demonstrate that Eller has not yet proven to be a consistent two-way centre for the Montreal Canadiens. He often lacks discipline and is prone to significant slumps in his offensive and defensive performance. His performance during last season and over the course of his career has not justified substantial increase in salary. As such, the Club submits that Lars Eller should be entitled to an award of \$2.3 million per year.

PART II – INTRODUCTION TO LARS ELLER

Eller was drafted 13th overall in the 2007 NHL Entry Draft by the St. Louis Blues.² He played only seven games for the Blues before being acquired by the Canadiens through a trade in the 2009-10 off-season.³ Prior to the 2012-13 season, Eller signed a two-year contract with the Club for an average of \$1.325 million per year.⁴ Eller has played a total of four seasons for the Club and played 77 of 82 games in his Platform Year.⁵ This past season, his average time on ice (“ATOI”) rose to a career high of 15:58 per game.⁶ Eller has shown to be quite versatile; although he played the majority of the year as the Club’s third line centre, Eller also saw ice time on the second line, as well as on the wing.⁷ During his Platform Year, Eller played 13:26 per game at even strength, 1:06 per game on the power play, and 1:24 per game short-handed.⁸ His points per game (“P/GP”) in his Platform Year was 0.34, very comparable to his Career to

¹ NHL Collective Bargaining Agreement, 2013.

² <http://www.nhl.com/ice/playerstats.htm>.

³ <http://canadiens.nhl.com/club/news.htm?id=531926>.

⁴ <http://www.capgeek.com>.

⁵ <http://www.nhl.com/ice/playerstats.htm>; “Platform Year” is defined as the year immediately preceding a player’s arbitration eligibility.

⁶ <http://www.nhl.com/ice/playerstats.htm>.

⁷ <http://hockey.dobbersports.com/>.

⁸ <http://www.nhl.com/ice/playerstats.htm>.

Platform⁹ rate of 0.36 P/GP, suggesting that his performance during his Platform Year was consistent with his performance throughout his career.¹⁰ He led Montreal forwards last season in both hits and blocked shots (130 and 58, respectively).¹¹ He committed 25 giveaways last season, but earned 30 takeaways (0.3 giveaways and 0.4 takeaways per game).¹²

Eller's performance during last season's Stanley Cup Playoffs took everyone by surprise. He produced at a rate of 0.76 P/GP; more than double that of his regular season production.¹³ Although his playoff performance is to be admired, the Club views it as something entirely unsustainable. His shooting percentage was 21.7% in the playoffs; more than double that of his career average of 10.3%.¹⁴ This shooting rate cannot be sustained long term. Furthermore, Eller only played a total of 17 games in the playoffs, which is a very small sample size to consider. For these reasons, the Club submits that Eller's playoff performance from last season should not hold significant weight in this hearing.

Eller had significant trouble playing with any consistency last season. During the first half of the season, Eller scored at a rate of 0.46 P/GP; however, this rate drastically decreased to only 0.19 P/GP during the latter half of the season.¹⁵ His time on ice statistics shows a similar decrease from the first half to the second half of the season (17:06 and 14:39 ATOI, respectively).¹⁶ In fact, near the end of the regular season, Eller was a healthy scratch for one

⁹ "Career to Platform" includes all previous NHL seasons from the player's first game up to and including the player's Platform Year.

¹⁰ <http://www.nhl.com/ice/playerstats.htm>.

¹¹ <http://www.nhl.com/ice/playerstats.htm>.

¹² <http://www.nhl.com/ice/playerstats.htm>.

¹³ <http://www.nhl.com/ice/playerstats.htm>.

¹⁴ <http://www.nhl.com/ice/playerstats.htm>.

¹⁵ <http://www.nhl.com/ice/playerstats.htm>.

¹⁶ <http://www.nhl.com/ice/playerstats.htm>.

game after accumulating only 4 points in the previous 34 games and posting a dismal -12 plus/minus rating.¹⁷

Eller has also shown a lack of discipline during his Platform Year and over the course of his career. Last season he accumulated 68 penalty minutes.¹⁸ This is one of the highest totals of any player on the Club, and the highest total of anyone who did not record a single fighting major. More than half of his penalties were tripping, holding, or hooking minors; each of these calls generally indicates that a player made a rash decision due to the fact that he was out of position in relation to the puck carrier.¹⁹

Given that Eller plays the vast majority of his time at even strength, it is valuable to look at his performance in that situation. At even strength, Eller has not yet proven to be a reliable two-way centre. The easiest way to look at overall success at even strength is to look at a player's plus/minus rating. Eller's plus/minus rating last season was -15, by far the worst rating of any other forward on the Club.²⁰ An even more precise method of looking at a player's two-way success at even strength is to look at offensive and defensive production at even strength. Last season, Eller scored an average of 1.22 points per sixty even strength minutes ("ESP/60").²¹ This was the lowest rate of any of the Club's top nine forwards.²² While he was on the ice, the Canadiens averaged 2.7 goals against per sixty even strength minutes ("GA/60").²³ This is the second worst of any Canadiens forward.²⁴ This demonstrates that Eller provided no additional offensive advantage to his teammates and was a defensive liability while on the ice. This is hardly the performance that the Club requires of its third line centre.

¹⁷ <http://www.nhl.com/ice/playerstats.htm>.

¹⁸ <http://www.nhl.com/ice/playerstats.htm>.

¹⁹ <http://www.nhl.com/ice/playerstats.htm>.

²⁰ <http://www.nhl.com/ice/playerstats.htm>.

²¹ <http://www.hockeyabstract.com/testimonials>.

²² <http://www.hockeyabstract.com/testimonials>.

²³ <http://www.stats.hockeyanalysis.com/ratings.php>.

²⁴ <http://www.stats.hockeyanalysis.com/ratings.php>.

PART III – SELECTION OF VALID COMPARABLE PLAYERS

The Club selected its comparable players objectively through the analysis of their statistical performance. Only NHL forwards who were arbitration eligible at the conclusion of the 2012-13 or 2013-14 seasons were considered. Players who were arbitration eligible at the end of the 2013-14 season, but who had not signed a contract prior to July 24, 2014 were not considered. The criteria used by the Club to select its comparable players was:

Platform Year²⁵

- +/- 3 minutes of regular season ATOI
- Played in at least half of their team's regular season games
- +/- 40% of regular season P/GP

Career to Platform²⁶

- +/- 3 minutes of regular season ATOI
- +/- 30% of total regular season games played
- +/- 30% of regular season P/GP

A total of three NHL forwards fit the criteria mentioned above and are depicted in *Table 1*. The Club will use all three players as comparable players to Lars Eller. These players are Jiri Tlusty, Shawn Matthias, and Lauri Korpikoski.

Table 1: Comparable Players²⁷

Player	Platform Year	Platform Year			Career To Platform		
		GP	ATOI	P/GP	GP	ATOI	P/GP
Lars Eller	2014	77	15:58	0.34	286	14:10	0.36
Jiri Tlusty	2014	68	15:10	0.44	344	13:41	0.41
Shawn Matthias	2013	48	15:11	0.44	253	13:11	0.32
Lauri Korpikoski	2013	36	17:07	0.31	336	14:28	0.34

²⁵ Between 12:58 – 18:58 ATOI; at least 41 GP in 2013-14 or 24 GP in 2012 - 13; between 0.20 – 0.47 P/GP.

²⁶ Between 11:10 – 17:10 ATOI; between 200 – 372 total games played; between 0.25 – 0.47 P/GP.

²⁷ All performance statistics in *Table 1* are available at <http://www.nhl.com>

PART IV – ANALYSIS OF ELLER AND COMPARABLE PLAYERS

A. JIRI TLUSTY

In early July 2014, Jiri Tlustý (“Tlustý”) signed a one-year deal with the Carolina Hurricanes worth \$2.95 million for the year.²⁸ Tlustý’s time on ice is similarly distributed to Eller’s. During his Platform Year, Tlustý played an average of 15:10 per game (13:05 at even strength, 1:29 on the power play, and 0:34 short-handed).²⁹ Tlustý outperformed Eller offensively last season, producing 30 points at a rate of 0.44 P/GP.³⁰ He has also outperformed Eller over the course of his career, albeit by a slimmer margin, with a Career to Platform rate of 0.41 P/GP.³¹ During his Platform Year, Tlustý committed 0.3 giveaways per game and earned 0.4 takeaways per game, the exact same rate as Eller.³² Although Tlustý did not hit as often as Eller, he has proven to be a much more disciplined player, taking only 22 minutes in penalties over the course of his 66 games last season, far fewer than Eller.³³

Tlustý shows significant advantages over Eller at even strength. In terms of plus/minus rating, Tlustý was +2 last season, which is noteworthy considering only 5 of Carolina’s 19 forwards finished the season with a positive plus/minus rating.³⁴ Eller, as mentioned above, was a team worst -15 during that same year. During his Platform Year, Tlustý scored even strength points at a rate of 1.82 ESP/60, fourth best for Carolina forwards and far higher than Eller.³⁵ While Tlustý was on the ice, the Carolina Hurricanes only allowed 2.4 GA/60.³⁶ This puts Tlustý in the top half of Carolina’s forwards, and much better than Eller. Tlustý’s offensive production is higher than Eller while at the same time he is also more reliable on the defense.

²⁸ <http://www.capegeek.com>.

²⁹ <http://www.nhl.com/ice/playerstats.htm>.

³⁰ <http://www.nhl.com/ice/playerstats.htm>.

³¹ <http://www.nhl.com/ice/playerstats.htm>.

³² <http://www.nhl.com/ice/playerstats.htm>.

³³ <http://www.nhl.com/ice/playerstats.htm>.

³⁴ <http://www.nhl.com/ice/playerstats.htm>.

³⁵ <http://www.hockeyabstract.com/testimonials>.

³⁶ <http://www.stats.hockeyanalysis.com/ratings.php>.

Through the analysis above, it is evident that Jiri Tlustý outperformed Lars Eller in nearly every statistical category. The Club submits that Eller's award should be significantly lower than Tlustý's salary of \$2.95 million.

B. SHAWN MATTHIAS

In July 2013, Shawn Matthias ("Matthias") signed a two-year deal with the Florida Panthers worth an average of \$1.75 million per year.³⁷ He was subsequently acquired by the Vancouver Canucks prior to the 2014 NHL Trade Deadline.³⁸ Matthias is utilized in nearly the exact same fashion as Eller, averaging 13:13 per game at even strength, 0:54 on the power play, and 1:03 short-handed.³⁹ Matthias outperformed Eller offensively during his Platform Year, scoring at a rate of 0.44 P/GP.⁴⁰ However, when looking at Career to Platform statistics, Eller actually outperformed Matthias by a small margin (0.36 P/GP to 0.32 P/GP).⁴¹ During his Platform Year, Matthias committed 0.1 giveaways but earned 0.3 takeaways per game, which shows that he makes far fewer mistakes with the puck than Eller.⁴² Although Matthias averaged only one less hit per game than Eller, he was a much more disciplined player. Matthias received only taking 16 minutes in penalties over the course of his 48 games, far fewer than Eller.⁴³

Matthias and Eller have fairly equal even strength statistics. In terms of a plus/minus rating, Matthias was -8 in the lockout shortened season.⁴⁴ However, the Florida Panthers had the worst goal differential in the NHL that season, and had only two players without a negative plus/minus rating, both of whom played less than 10 games.⁴⁵ Matthias' plus/minus rating would likely be very similar to Eller's had he played a full season. Matthias scored at a rate of 1.61

³⁷ <http://www.capegeek.com>.

³⁸ <http://www.nhl.com/ice/playerstats.htm>.

³⁹ <http://www.nhl.com/ice/playerstats.htm>.

⁴⁰ <http://www.nhl.com/ice/playerstats.htm>.

⁴¹ <http://www.nhl.com/ice/playerstats.htm>.

⁴² <http://www.nhl.com/ice/playerstats.htm>.

⁴³ <http://www.nhl.com/ice/playerstats.htm>.

⁴⁴ <http://www.nhl.com/ice/playerstats.htm>.

⁴⁵ <http://www.nhl.com/ice/playerstats.htm>.

ESP/60 in his Platform Year, much higher than Eller. While Matthias was on the ice, Florida allowed 3.2 GA/60, which is significantly worse than the Canadiens when Eller is on the ice.⁴⁶ Like Eller, Matthias has shown to be defensive liability for his team. Given the difference in goals against between Eller and Matthias, it is likely that Matthias is weaker defensively.

Although Matthias outscored Eller in their respective Platform Years, Eller is arguably the better defensive player. The Club submits that Eller's award should be at or near Matthias' average salary of \$1.75 million.

C. LAURI KORPIKOSKI

In July 2013, Lauri Korpikoski ("Korpikoski") signed a four-year deal with the Phoenix Coyotes (now the Arizona Coyotes) worth an average of \$2.5 million per year.⁴⁷ Although Korpikoski played an average of 17:07 per game, more than a minute more than Eller, his time spent at even strength and on the power play is nearly identical to Eller (13:31 and 1:22, respectively).⁴⁸ During his Platform Year, Korpikoski accumulated 11 points in 36 games, a rate of 0.31 P/GP.⁴⁹ Eller outscored Korpikoski by a slight margin during his platform year. However, what Korpikoski lacks in offensive ability he makes up for in defensive responsibility. During his Platform Year, Korpikoski committed only 0.1 giveaways per game but earned 0.5 takeaways per game.⁵⁰ This shows that Korpikoski takes much fewer risks while carrying the puck and is more effective at retrieving the puck than Eller. Korpikoski tallied 71 hits in 36 games during his Platform Year, a rate that is actually higher than Eller's (6.9 hits per game

⁴⁶ <http://www.stats.hockeyanalysis.com/ratings.php>.

⁴⁷ <http://www.capgeek.com>.

⁴⁸ <http://www.nhl.com/ice/playerstats.htm>.

⁴⁹ <http://www.nhl.com/ice/playerstats.htm>.

⁵⁰ <http://www.nhl.com/ice/playerstats.htm>.

compared to Eller's 6.4 hits per game).⁵¹ Despite this increase in hits, Korpikoski only took 12 minutes in penalties, showing that he is much more disciplined than Eller.⁵²

Eller and Korpikoski perform very similarly at even strength. In terms of plus/minus rating, Korpikoski was -3 in the lockout shortened season. Even if it had been a full season, Korpikoski's rating would still likely be better than Eller, at -15. Korpikoski scored at a rate of 1.17 ESP/60 in his Platform Year, nearly the exact same rate as Eller.⁵³ While Korpikoski was on the ice, the Coyotes allowed 2.3 GA/60.⁵⁴ This rate is significantly better than the Canadiens when Eller is on the ice suggesting that Korpikoski is the better defensive player to Eller by a considerable margin.

Overall, Eller may have outscored Korpikoski by a small margin in their respective Platform Years; however, Korpikoski has shown to be a much better player defensively. Furthermore Korpikoski has shown to be more aggressive than Eller while still maintaining a high level of discipline. The Club submits that Eller's award should slightly below Korpikoski's average salary of \$2.5 million per year.

PART V - CONCLUSION

Eller may well develop into a true two-way centre in the future; however, there are significant holes in his development at this point in his career. Although he is capable of producing offensively, he lacks consistency in his performance. Eller has demonstrated a lack of discipline and an inability to help the Club defensively. Therefore, the Club respectfully submits that Eller should receive an award of \$2.3 million per year.

⁵¹ <http://www.nhl.com/ice/playerstats.htm>.

⁵² <http://www.nhl.com/ice/playerstats.htm>.

⁵³ <http://www.nhl.com/ice/playerstats.htm>.

⁵⁴ <http://www.stats.hockeyanalysis.com/ratings.php>.