# MISSOURI PUBLIC SERVICE COMMISSION 

FILE NO.: ER-2016-0179

REBUTTAL TESTIMONY
OF

ROBERT B. HEVERT

ON BEHALF OF

UNION ELECTRIC COMPANY d/b/a Ameren Missouri

Westborough, Massachusetts
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# REBUTTAL TESTIMONY 

## OF

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## I. INTRODUCTION AND OVERVIEW

## Q. Please state your name and business address.

A. My name is Robert B. Hevert. I am a Partner with ScottMadden, Inc. ("ScottMadden"), and my business address is 1900 West Park Drive, Suite 250, Westborough, MA 01581.
Q. Are you the same Robert B. Hevert who pre-filed Direct Testimony in this matter?
A. Yes, I am.
Q. What is the purpose of your Rebuttal Testimony?
A. On behalf of Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company") my Rebuttal Testimony responds to the Revenue Requirement Cost of Service Report (the "Staff Report") submitted in this proceeding by the Missouri Public Service Commission Utility Services Division ("Staff") as it relates to the recommended Return on Equity ("ROE") for the Company. Dr. J. Randall Woolridge presents Staff's ROE recommendation. I also respond to the direct testimony of Mr. Michael P. Gorman on behalf of Midwest Energy Consumer's Group and Missouri Industrial Energy Consumers, as his direct testimony relates to the Company's ROE. My analyses and conclusions are supported by the data presented in Schedules RBH-R1 through RBH-R18, which have been prepared by me or under my direction.
Q. Please provide a summary overview of the recommendations contained in your Rebuttal Testimony.
A. In my Direct Testimony I recommended an ROE within a range of 9.75 percent to 10.50 percent. As my Direct Testimony discussed, my ROE recommendation and the analytical results on which it is based reflect a variety of factors, including certain risks faced by Ameren Missouri (such as the regulatory environment in which the Company operates, the Company's generation portfolio, and its capital expenditure plans), and consider prior Orders by the Commission.

Because the application of financial models and the interpretation of their results are often sources of disagreement among analysts in regulatory proceedings, I believe it is important to review and consider a variety of data points; doing so enables us to put in context both quantitative analyses and the associated recommendations. As such, I have updated many of the analyses contained in my Direct Testimony, and I have provided several new analyses in response to issues raised by Dr. Woolridge and Mr. Gorman ("the Opposing Witnesses"). As discussed throughout the balance of my Rebuttal Testimony, those analyses continue to support my ROE range and recommendation.
Q. Please summarize the updated analyses contained in your Rebuttal

## Testimony.

A. In response to the Opposing Witnesses, I have updated the Constant Growth and Multi-Stage forms of the Discounted Cash Flow ("DCF"), the Capital Asset Pricing Model ("CAPM"), and Bond Yield Risk Premium analyses based on data through December 30, 2016, and have applied those analyses to my updated proxy group, which includes the proxy group contained in my Direct Testimony with the addition of Black Hills Corporation ("BKH") and

WEC Energy Group ("WEC"). BKH and WEC were removed from the proxy group in my Direct Testimony because of their acquisitions of SourceGas Holdings LLC and Integrys Energy Group, Inc., respectively. ${ }^{1}$ Because enough time has passed to ensure that the analytical results are not affected by those acquisitions, I have included BKH and WEC in my updated proxy group.
Q. Are there capital market measures that are helpful to observe in assessing ROE recommendations?
A. Yes, there are. For example, from July 2016 (when Treasury yields fell to their lowest levels) to December 2016, the 30 -year Treasury yield increased by 88 basis points; the 10 and 20-year yields increased by 99 and 102 basis points, respectively. ${ }^{2}$ In each case (that is, for the 10,20 , and 30 -year yields) the basis point increase was in the top $96^{\text {th }}$ percentile of all five-month periods observed from 1990 through 2016. In terms of the percentage increase, the 10 and 20-year yield increase (from July through December 2016) was the highest observed; the 30-year yield increase was in the top $99^{\text {th }}$ percentile. In short, the increase in yields observed during through December 2016 was historically high. Because the Cost of Equity is related to Treasury yields, it is reasonable to conclude that it, too, has increased.
Q. Does market-based data indicate that investors see a probability of further increasing interest rates?
A. Yes, market data indicates expected increases in both short and long-term interest rates. Regarding future Federal Funds rate increases, data compiled by CME Groups indicates

[^0]that investors see a 92.80 percent likelihood of further Federal Funds rate increases, even after the December 14, 2016 increase. As shown in Table 1, (below) the market is now anticipating at least one additional rate hike (68.00 percent probability) and possibly two or three ( 34.40 percent and 11.20 percent probability, respectively) by December 2017. In fact, the implied probability of no increase in the coming year is only 7.20 percent.

Table 1: Probability of Federal Funds Rate Increases ${ }^{3}$

| Target Rate <br> (bps) |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | $2 / 1 / 17$ | $3 / 15 / 17$ | $5 / 3 / 17$ | $6 / 14 / 17$ | $7 / 26 / 17$ | $9 / 20 / 17$ | $11 / 1 / 17$ | $12 / 13 / 17$ |
|  | $97.0 \%$ | $75.5 \%$ | $62.6 \%$ | $30.8 \%$ | $25.5 \%$ | $18.5 \%$ | $14.8 \%$ | $7.2 \%$ |
| $75-100$ | $3.0 \%$ | $23.8 \%$ | $32.7 \%$ | $47.9 \%$ | $44.9 \%$ | $39.6 \%$ | $35.4 \%$ | $24.8 \%$ |
| $100-125$ |  | $0.7 \%$ | $4.6 \%$ | $18.9 \%$ | $23.9 \%$ | $29.6 \%$ | $31.6 \%$ | $33.6 \%$ |
| $125-150$ |  |  | $0.1 \%$ | $2.4 \%$ | $5.3 \%$ | $10.3 \%$ | $14.2 \%$ | $23.2 \%$ |
| $150-175$ |  |  |  | $0.1 \%$ | $0.5 \%$ | $1.8 \%$ | $3.5 \%$ | $9.0 \%$ |
| $175-200$ |  |  |  |  |  | $0.1 \%$ | $0.5 \%$ | $2.0 \%$ |
| $200-225$ |  |  |  |  |  |  |  | $0.3 \%$ |

Looking to long-term interest rates, consensus projections gathered by Blue Chip Financial Forecasts suggest a 30-year Treasury yield of 3.60 percent by the first quarter of 2018 (an approximately 54 basis point increase over the 3.06 percent yield as of end of December, and an approximately 140 -basis point increase over the 2.24 percent yield as of the filing of my Direct Testimony). ${ }^{4}$ The Social Security Administration ("SSA") projects that long-term Treasury yields will rise from 2.40 percent in 2016 to 4.80 percent by 2021. Similarly, market expectations for increased long-term Treasury yields are apparent in the market prices to buy or sell at-the-money options in long-term Government bond funds. That is, the value of the option to sell the TLT (an exchange-traded fund of long-term Government bonds) in January 2019 at

[^1]today's price is approximately one and a half times more than the value of the option to buy that fund. ${ }^{5}$ Since bond prices fall as interest rates increase, investors see a greater likelihood of increases in long-term interest rates than decreases.

Lastly, we can view the market's expectations of future interest rates based on the current yield curve. Those expected rates, often referred to as "forward yields", are derived from the "Expectations" theory which states that (for example) the current 30-year Treasury yield equals the combination of the current three-year Treasury yield, and the 29-year Treasury yield expected in one year. That is, an investor would be indifferent to (1) holding a 30-year Treasury to maturity, or (2) holding a one-year Treasury to maturity, then a 29-year Treasury bond, also to maturity. ${ }^{6}$ As Chart 1 (below) indicates, since 2006 the implied forward 29- and 28- year yields (one and two years hence, respectively) consistently exceeded the (interpolated) spot yields. That is, just as economists' projections implied increased interest rates, so did observable Treasury yields.

[^2] Chart 1: Forward vs. Interpolated Treasury Yields ${ }^{7}$

Q. Have you considered other data points in your assessment of general economic conditions?
A. Yes. Although a single observation, I note that the Bureau of Economic Analysis recently announced that third quarter Gross Domestic Product rose by 3.50 percent. ${ }^{8}$ At the same time, expected inflation (as measured by the 30-year TIPS spread) was in the range of 2.05 percent to 2.10 percent, ${ }^{9}$ suggesting nominal GDP growth in the range of 5.60 percent to 5.65 percent.

## Q. What do you conclude from this data?

A. First, it is clear that interest rates have increased from the low levels experienced in 2015 and 2016. It also is clear that investor expectations, as measured by forward Treasury yields and the implied probability of Federal Funds rate increases, suggest rising capital costs in

[^3]the near term. Those higher Treasury yields, again, indicate expectations for increased capital costs. The observation that interest rates and GDP growth have increased indicate that the financial community sees the strong prospect of increased growth throughout the economy. As that occurs, and as interest rates continue to rise, it would be reasonable to expect higher dividend yields and higher growth rates. In the context of the DCF model, those variables would combine to indicate increases in the Cost of Equity relative to recent years.

Although the market data discussed above indicate increasing costs of capital, it is important to keep in mind that: estimating the Cost of Equity is an empirical, but not an entirely mathematical exercise; that the methods used, or the weight given to any one method, may change from case to case; and that the returns authorized in other jurisdictions provide a relevant, observable and verifiable benchmark for assessing the reasonableness of analytical assumptions, results, and conclusions. With those points in mind, I continue to believe that a reasonable range of ROE estimates is from 9.75 percent to 10.50 percent.

## Q. Have there been other recent periods when utility valuation levels were high relative to both their long-term average and the market?

A. Yes. In early 2015, the utility sector (as measured by the S\&P Electric Utility Index) traded at a Price/Earnings ratio of approximately 18.00. During the same period, the overall market (as measured by the S\&P 500) traded at a P/E of approximately 18.00. In late January 2015, the utility sector began to lose value, and by June 2015 it had lost approximately 15.50 percent of its value. Similarly, the P/E ratio of the S\&P Electric Utility Index was only slightly below that of the S\&P 500 in early July 2016. Since then, the S\&P Electric Utility Index lost approximately 9.00 percent of its value, while the S\&P 500 increased approximately 6.62 percent. Also during that time, the 30-year Treasury yield increased by 92 basis points (an
increase of approximately 43.00 percent). The point simply is that as investors see an increasing likelihood of higher interest rates, they will move out of sectors that provided higher yields relative to the overall market. As they do, valuations and $\mathrm{P} / \mathrm{E}$ ratios fall.

## Q. What conclusions do you draw from those analyses?

A. In my view, we cannot conclude that the recent levels of utility valuations are due to a fundamental change in the risk perceptions of utility investors. Based on those observations, I disagree that the Company's Cost of Equity is 9.20 percent, and certainly not well below 9.20 percent, as the Opposing Witnesses propose.

## Q. Please provide an overview of your response to the ROE recommendations

 made by the Opposing Witnesses.A. As the Commission has pointed out, because no one financial model is any more "correct" than any other in all circumstances, it is important to consider the results of a variety of methods. ${ }^{10}$ I agree with the Commission's finding that, at times, certain model results simply do not make sense. In keeping with that approach, my Rebuttal Testimony considers a variety of analytical methods, and reflects both Company-specific and general market factors.

The Commission also has found that because ratemaking is an inexact science, and given that there is no statutorily prescribed method to estimate the Cost of Equity, different approaches may be used in different cases. ${ }^{11}$ I agree with the Commission on that point, as well. Although doing so requires the use of financial models, determining the Cost of Equity does not always lend itself to a strictly mathematical solution. Rather, it requires the application of reasoned judgment in vetting the models and assumptions used by various analysts, and in assessing the

[^4]reasonableness of their recommendations. That judgment may well lead to the conclusion that the emphasis applied to a particular method in a prior proceeding is not appropriate in the current instance.

In this proceeding the Opposing Witnesses have given considerable weight to the DCF method, even though their models produce ROE estimates that are approximately 45 to 106 basis points below the returns authorized by state commissions across the country for other electric utilities. Both Staff and Mr. Gorman give considerable weight to their Constant Growth DCF models, even though the highest of their DCF estimates are approximately equal to the lowest ROE ever authorized for a vertically integrated electric utility.

Given their common dependence on a method that produces disproportionately low estimates, it is not surprising that the Opposing Witnesses' ROE recommendations fall far below the range of returns authorized in other jurisdictions. Like this Commission, other regulatory authorities have been reluctant to give undue weight to models and methods that produce unreasonably low results. As I discuss below, Mr. Gorman's ROE recommendation of 9.20 percent, and certainly Dr. Woolridge's recommendation of 8.75 percent, are below even those authorized for utilities that do not have the operating, environmental, and financial risks associated with owning electric generating assets. In fact, they are below the returns authorized in regulatory environments considered less constructive than Missouri. ${ }^{12}$ Consequently, there is no reason to conclude that the Opposing Witnesses' recommendations or their methods are sound or their assumptions are reasonable.

[^5]In my Direct Testimony, I recommended an ROE of 9.90 percent, based on a range of ROE estimates of 9.75 percent to 10.50 percent. My updated analyses continue to support my position that my ROE recommendation of 9.90 percent is within a reasonable range of estimates of the Company's Cost of Equity. By contrast, Dr. Woolridge's and Mr. Gorman's recommendations of 8.75 percent and 9.20 percent, respectively, are unreasonably low. Dr. Woolridge's recommendation, in particular, diverges so far from the range of reasonableness that it should be considered an outlier.

Taken as a group, the Opposing Witnesses’ ROE recommendations are far below any objective measure of the Company's Cost of Equity. For example, as shown in Chart 2, below, Mr. Gorman's revised recommendation is below all but one return authorized for a vertically integrated electric utility; that one case included a 50 basis points penalty for "system inefficiencies." ${ }^{13}$ Dr. Woolridge' 8.75 percent recommendation is 25 basis points below the lowest authorized return since at least 1980.

[^6]Chart 2: Authorized Returns for Vertically Integrated Electric Utilities 2013-2016


It also is important to note that over that period, the average authorized return was 9.77 percent, only 13 basis points from my 9.90 percent recommendation. ${ }^{14}$ Mr. Gorman’s 9.20 percent ROE recommendation on the other hand, is 57 basis points from the average; Dr. Woolridge's recommendation is 102 basis points removed. On that basis alone, it is apparent that Dr. Woolridge's 8.75 percent recommendation is an outlier that falls beyond an objective measure of reasonableness - returns authorized in other jurisdictions. And as discussed earlier, but for the 50 basis points adjustment in Maui Electric's rate proceeding, Mr. Gorman's recommendation would set the floor.

For the reasons discussed throughout the balance of my Rebuttal Testimony, their recommendations cannot be supported by the reasonable application of financial models, nor can they be justified by current or expected market conditions. Rather, the Opposing Witnesses' ROE recommendations are unproductive and would only serve to increase the Company's

[^7]regulatory and financial risk, diminish its ability to compete for capital, and have the counterproductive effect of increasing Ameren Missouri's overall cost of capital, ultimately to the detriment of its customers.

Lastly, although Dr. Woolridge's recommendation is far below a reasonable level, a few very reasonable adjustments to Mr. Gorman's analyses produce results ranging from 9.65 percent to 10.15 percent, which is very consistent with my recommendation. Those adjustments are discussed in more detail in Section III.
Q. Please summarize your response to the Opposing Witnesses.
A. My responses to Staff Witness Woolridge and OPC Witness Gorman are summarized below:

- ROE Recommendations. The Opposing Witnesses’ recommended ROEs are unreasonably low and far removed from recently authorized returns. Dr. Woolridge's recommendation in particular is significantly below the lowest authorized return for any vertically integrated utility since at least 1980 and over 100 basis points below the average authorized return in the United States in 2016.
- Reasonable Adjustments to Mr. Gorman's Analytical Models Increase his ROE Recommendation. Adjusting Mr. Gorman's CAPM analysis to rely on more reasonable estimates of the market return results in a range of estimates from 9.44 percent to 10.37 percent. Adjusting Mr. Gorman's Risk Premium analysis to exclude results well below any reasonable measure of the Company's ROE (and which are below other results which Mr. Gorman discards in his DCF analysis), suggests a range of estimates from 9.96 percent to 10.15 percent. Similarly, if Mr. Gorman had relied on the widely understood inverse relationship between the

Equity Risk Premium and interest rates in his Risk Premium analysis, his results would range from 9.65 percent to 9.88 percent. Had Mr. Gorman relied on the more reasonable analyses noted above, and given less weight to the DCF analysis, which is less reliable under current market conditions, his recommended ROE likely would be similar to the low end of my recommended range, (i.e., 9.75 percent).

- Application of Discounted Cash Flow methods. As a general matter, DCF-based methods define the Cost of Equity as the discount rate that sets the current market price of a stock equal to the present value of the cash flows expected from owning that stock. In calculating expected cash flows, the Opposing Witnesses rely on growth rates that are inappropriately low, or that are constrained by what they may consider to be "sustainable" levels of perpetual growth. Regardless of how they develop their models, DCF estimates of 9.00 percent (Mr. Gorman’s DCF result), or below, fail to meet the Hope and Bluefield "end result" standard, and should be given no weight in determining the Company's ROE.
- Application of Risk Premium Models. Risk Premium methods are based on the financial principle that equity investors assume greater risk than do debt investors and, therefore, require higher returns. The measure of that incremental return is the "Equity Risk Premium," or the difference between the required return on debt and the required Return on Equity. It is important to recognize that the Equity Risk Premium is not constant over time. Rather, as interest rates fall, the Equity Risk Premium increases, even when we consider additional measures of market
risk. By not properly reflecting that well-documented relationship, certain of the Opposing Witnesses have under-estimated Ameren's Cost of Equity.
- Application of the Capital Asset Pricing Model ("CAPM"). The CAPM, which also is a risk premium-based method, assumes that investors must be compensated for the time value of money, and for taking on additional risk. The time value of money is measured by long-term Treasury yields; compensation for additional risk is measured by the stock's Beta coefficient and the expected Market Risk Premium ("MRP"). The MRP, which weighs heavily in CAPM estimates, reflects the additional return that investors expect to receive by investing in the market as a whole over the return they would receive by investing only in long-term Treasury bonds. Dr. Woolridge relies on Equity Risk Premium estimates that result in a market return approximately equal to his recommended ROE for Ameren. In addition, Mr. Gorman developed MRP estimates based on historical market returns and interest rates. Dr. Woolridge and Mr. Gorman have assumed relationships between those two variables that do not reasonably reflect current or expected market conditions. As a result, their ROE estimates are unreasonably low.
- Assessment of the Company's relative risk. Determination of required ROE is a risk-comparable exercise. The Opposing Witnesses do not fully consider the range of business risks and other factors when determining where Ameren's required ROE falls within the range of analytical results.


## II. RESPONSE TO STAFF WITNESS WOOLRIDGE

Q. Please provide a brief summary of Dr. Woolridge's testimony and ROE recommendation.
A. Dr. Woolridge recommends an ROE of 8.75 percent, which is at the upper end of his DCF and CAPM results. Dr. Woolridge makes clear, however, that his recommendation relies primarily on his Constant Growth DCF model results. ${ }^{15}$
Q. What are the principal areas of disagreement between you and

## Dr. Woolridge?

A. There are several areas in which I disagree with Dr. Woolridge. In general, those areas include: (1) The reasonableness of an ROE recommendation far below recently authorized ROEs; (2) the composition and selection of the proxy group companies; (3) the growth rates applied in the Constant Growth DCF model; (4) the application of the CAPM; (5) the relevance of Market-to-Book ("M/B") ratios in excess of unity; and (6) the business risk of Ameren Missouri relative to the proxy group. In addition, I disagree with Dr. Woolridge's presentation and interpretation of certain data relating to capital market conditions.

## A. Recommended ROE

Q. Is Dr. Woolridge's 8.75 percent consistent with recently authorized returns for electric utilities?
A. No. As shown in Schedule RBH-R6, an ROE of 8.75 percent is far below the returns currently authorized for electric utilities. In fact, as noted by Dr. Woolridge, an 8.75

[^8]percent ROE would be approximately 83 to 126 basis points below the recent average returns for electric utilities. ${ }^{16}$
Q. How does Dr. Woolridge's recommended ROE compare to authorized ROEs in the United States?
A. Dr. Woolridge's 8.75 percent recommended ROE is below any authorized ROE for a vertically integrated utility in the United States since at least 1980, and over 100 basis points below the average authorized return in 2016. See Attachment A. In fact, the lowest authorized ROE over that time was 25 basis points higher than Dr. Woolridge's recommendation. As shown in Chart 2, my recommended ROE is similar to numerous recently authorized returns; Dr. Woolridge's recommendation, however, is significantly removed from any recently authorized return.
Q. How does Dr. Woolridge's recommended ROE compare to authorized ROEs

## in Missouri?

A. An authorized return of 8.75 percent would be 75 basis points below the lowest authorized return for any electric or natural gas utility in Missouri since at least 1980.
Q. What is your conclusion regarding the reasonableness of Dr. Woolridge's recommended ROE?
A. Regardless of how Dr. Woolridge arrived at his recommendation, it is very difficult to reconcile an ROE of 8.75 percent with past, current, and expected market environments. The implications of Dr. Woolridge not reconciling his ROE recommendation with authorized returns are particularly acute since, as described below, his conclusion is based

[^9]principally on his application of a single model for which his inputs are quite subjective, his results cannot be replicated, and whose underlying assumptions are incompatible with prevailing market conditions.

## B. Proxy Group Selection

Q. Please describe the screening criteria by which Dr. Woolridge developed his

## Proxy Group.

A. Dr. Woolridge relied on six screening criteria to develop his sample of 30 companies:

1. Proxy companies must derive at least 50.00 percent of revenues from regulated electric operations;
2. Each company selected must be listed as an Electric Utility by Value Line and as an Electric Utility or Combination Electric and Gas company by AUS Utilities Reports;
3. Selected companies must have an investment grade bond rating;
4. Companies must have a consistent dividend record with no cuts or omissions for the past six months;
5. Each company must not be involved in an acquisition, or be the target of an acquisition in the past six months; and
6. Proxy companies must have long-term earnings per share ("EPS") growth forecasts available from Yahoo!, Reuters, or Zacks. ${ }^{17}$
[^10]
## Q. Do you agree with Dr. Woolridge's screening criteria?

A. Not entirely. Although we do have certain criteria in common (for example we both exclude companies that are party to a significant corporate transaction or that do not consistently pay dividends), as explained below, I do not believe that Dr. Woolridge's screens render a group of companies that is sufficiently comparable to Ameren Missouri. For example, Dr. Woolridge includes Ameren Corporation, the parent company of Ameren Missouri, in his proxy group. However, to avoid the circular logic that would otherwise occur, I removed Ameren Corporation from my proxy group. ${ }^{18}$
Q. Do any of Dr. Woolridge's proxy companies fail his proxy group screening criteria?
A. I believe so. Dr. Woolridge included in his proxy group Dominion Resources ("Dominion"), Duke Energy Corporation ("Duke"), and Southern Company ("Southern"), which are all party to significant acquisitions: Dominion completed its acquisition of Questar on September 16, 2016; ${ }^{19}$ Duke completed its acquisition of Piedmont Natural Gas Company, Inc. on October 3, 2016; ${ }^{20}$ and Southern completed its acquisition of AGL Resources Inc. on July 1, 2016. ${ }^{21}$ As such, those companies should be removed from the proxy group.

[^11]Q. What is your concern with Dr. Woolridge's use of revenue, rather than income, as a screening criterion?
A. Measures of income are far more likely to be considered by the financial community in making credit assessments and investment decisions than are measures of revenue. From the perspective of credit markets, measures of financial strength and liquidity are focused on cash from operations, which is directly derivative of earnings, as opposed to revenue. For example, Moody's assigns a 40.00 percent weight to measures of financial strength and liquidity, of which 32.50 percent specifically relates to the ability to cover debt obligations with cash from operations. ${ }^{22}$

Just as rating agencies focus on measures of cash from operations, equity investors prefer measures of income in assessing equity valuation levels; common measures of relative equity valuation include the Price/Earnings ("P/E") ratio, and the ratio of Enterprise Value/EBITDA (Earnings Before Interest, Taxes, Depreciation, and Amortization). Revenue, however, may be several steps removed from the earnings and cash flows that are the basis of equity valuations. For example, energy trading and marketing units often represent high revenue but low margin operations. Those operations may generate a comparatively large proportion of the combined entity's revenue, but only a small percentage of its income. In such cases, focusing on revenue may mislead the analyst into assuming that a given operating unit is the primary driver of expected growth, when other business segments create the majority of earnings and cash flows. Here, we are considering whether the underlying utility is the principal source of long-term

[^12]growth and as such, it could be misleading to focus on revenue rather than earnings for the purpose of identifying proxy companies.

## C. Application of the Constant Growth DCF Approach

Q. Please summarize your concerns with the Constant Growth DCF model and

## Dr. Woolridge's application of that method.

A. There are several aspects of Dr. Woolridge's DCF analyses and conclusions that are incompatible with market conditions, and inconsistent with the practical interpretation of the models' results. For example, the market data used in Dr. Woolridge's DCF analyses conflict with the models' underlying assumptions. In particular, the market prices used to calculate the dividend yield were taken from a period during which utilities in general, and the proxy companies in particular, traded at unusually high, and likely unsustainable, levels. In fact, as shown in Chart 3 below, during Dr. Woolridge's study period, utility P/E ratios exceeded their long-term average, and were higher than the market P/E ratio (as measured by the S\&P 500). ${ }^{23}$

[^13]Chart 3: P/E Ratios Over Time


The elevated P/E ratios are an important factor since the Constant Growth DCF model assumes constant $\mathrm{P} / \mathrm{E}$ ratios in perpetuity. Consequently, the basis of Dr. Woolridge's recommendation - the Constant Growth DCF model - assumes data that are inconsistent with the model's fundamental assumptions.

Lastly, Dr. Woolridge's application of the Constant Growth DCF model includes a degree of subjectivity that prevents us from replicating the fundamental inputs which drive his results. It is entirely feasible that analysts looking at the same data would come to different conclusions. For example, based on his review of historical and projected dividend, book value, earnings and "sustainable" growth rates, Dr. Woolridge assumes a growth rate of 5.00 percent for the companies in his proxy group, although it is unclear how he calculates that estimate. ${ }^{24}$ Moreover, Dr. Woolridge's judgment is to give "primary weight" ${ }^{25}$ to growth rate projections produced by equity analysts, despite his position that those analysts knowingly and persistently

[^14]produce biased forecasts.
Q. What growth rates did Dr. Woolridge review in his Constant Growth DCF analysis?
A. Dr. Woolridge reviewed a number of growth rates, including: historical and projected dividends per share ("DPS"), book value per share ("BVPS"), and EPS growth rates as reported by Value Line; analysts’ consensus EPS growth rate projections from Yahoo!, Reuters, and Zacks; and an estimate of "Sustainable Growth" derived from data provided by Value Line. Dr. Woolridge states that in arriving at his 8.55 percent DCF estimate, he gave more weight to projected EPS growth rates. ${ }^{26}$

Table 2: Summary of Dr. Woolridge's Growth Rate Estimates ${ }^{27}$

|  |  |
| :--- | :---: |
| Value Line Historical Growth Rates (DPS, <br> BVPS, EPS) | Dr. Woolridge <br> Proxy Group |
| Value Line Projected Growth Rates (DPS, <br> BVPS, EPS) | $4.20 \%$ |
| Sustainable Growth | $3.90 \%$ |
| Analyst Projected EPS Growth Rates (excl. <br> Value Line) - Mean/Median | $4.40 \% / 5.30 \%$ |
| Dr. Woolridge’s Assumed DCF Growth <br> Rate | $5.00 \%$ |

Q. Do you agree with Dr. Woolridge's Sustainable Growth rate estimate?
A. No, I do not. The Sustainable Growth model assumes that growth is a function of expected earnings, and the extent to which those earnings are retained (that is, not paid out in dividends). Dr. Woolridge relies on the simplest form of the Sustainable Growth model, the "br"

[^15]approach (where " $b$ " is the earnings retention rate, and " r " is the expected Return on Common Equity). As Schedule RBH-R7 demonstrates, the "br" method is essentially equal to Value Line's "Retained to Common Equity" rate (differences are due to rounding).

If Dr. Woolridge is going to consider a form of Sustainable Growth, he should use the "br +sv " form of the model, which reflects growth from both internally generated funds (i.e., the "br" term) and from issuances of equity (i.e., the "sv" term). As noted above, the first term is the product of the retention ratio (i.e., "b", or the portion of net income not paid in dividends) and the expected return on equity (i.e., " $r$ "). The "sv" term can be represented as:

$$
\left(\frac{m}{b}-1\right) \times \text { Growth Rate in Common Shares }
$$

Where:

In this form, the "sv" term reflects an element of growth as the product of: (1) the growth in shares outstanding; and (2) that portion of the market-to-book ratio that exceeds unity.

In addition, it is important to realize that for the purpose of setting utility rates, Sustainable Growth requires an estimate of the expected earned Return on Common Equity. Since the "r" in the "br" approach refers to the equity return, Dr. Woolridge effectively has pre-supposed the Return on Common Equity projected by Value Line for his proxy group companies. Notwithstanding that Dr. Woolridge has assumed the reasonableness of Value Line's projections for the purpose of his Sustainable Growth calculation, as demonstrated in Schedule RBH-R7, his recommended Cost of Equity of 8.75 percent is 185 basis points below the mean Return on Common Equity estimate for his proxy group of 10.60 percent.
Q. Are there reasons to doubt the results of a DCF analysis that uses the Sustainable Growth rate for electric utilities in particular?
A. Yes. As noted below, the projected realized Return on Common Equity for many of the proxy companies is significantly diluted by recent or projected additions to net plant.

## Q. Have you conducted any analyses to demonstrate how the proxy companies' earned ROE projections are diluted by ongoing capital expenditures?

A. Yes, I have. I analyzed Value Line's earned ROE projections using the "DuPont" formula, which decomposes the Return on Common Equity into three components: (1) the Profit Margin (net income/revenues); (2) Asset Turnover (revenues/net plant); and (3) the Equity Multiplier (net plant/equity). ${ }^{28}$

As Schedule RBH-R9 demonstrates, the Asset Turnover rate declined from 2008 through 2015 and is expected to remain at its current level through Value Line’s 2019 to 2021 projection period. Over that same period the proxy company average Net Plant experienced a cumulative increase of approximately 133.04 percent. Because the utility industry is going through a period of increased capital investment, the lag between the addition of net plant and revenue generated by those investments dilute the Asset Turnover ratio, at least in the near term. Consequently, the projected Return on Common Equity also is diminished, such that its usefulness as a measure of investors' expectations of long-term (i.e., in perpetuity) growth is limited.

As also shown in Schedule RBH-R9, there is a statistically significant negative relationship between the annual change in the Asset Turnover rate and the annual change in Net Plant, such that as annual net plant increases, the Asset Turnover ratio decreases. Again, that

[^16]analysis calls into question the reasonableness of the "Sustainable Growth" method as a measure of long-term growth.

## Q. Do Dr. Woolridge's analyses account for abnormally elevated $\mathbf{P} / \mathbf{E}$ ratios?

A. Not on a consistent basis. DCF-based methods, such as the Constant Growth model on which Dr. Woolridge relies, depend on recent stock prices as a principal input, and (in the case of the Constant Growth model) assume that P/E ratios, and resulting Cost of Equity, will remain constant in perpetuity. As noted above, an important analytical issue is that utility sector P/E ratios recently have been well above their historical levels. ${ }^{29}$

To support his CAPM analysis, Dr. Woolridge refers to "Building Block" approaches as part of the studies that he uses to estimate the Market Risk Premium ("MRP") (see Exhibit JRW-11, pages 5 and 6). Among the "Building Block" studies included in that review are those produced by Ibbotson and Chen. The Duff \& Phelps 2016 SBBI Yearbook also discusses the "Building Block" model, ${ }^{30}$ and in discussing the effect of increasing $\mathrm{P} / \mathrm{E}$ ratios on the market return, concludes that "reported earnings are affected not only by the long-term productivity, but also by 'one-time' items that do not necessarily have the same consistent impact year after year." ${ }^{31}$ Duff \& Phelps therefore uses three-year average P/E ratios to develop its Supply-Side market return estimate.

[^17]Q. What is the effect of Dr. Woolridge's inconsistent use of these elevated P/E ratios?
A. Although Dr. Woolridge recognized and adjusted his analyses to reflect the abnormal expansion in P/E ratios in his Building Blocks calculation, he did not acknowledge the same principle in his DCF analysis. That is, Dr. Woolridge relies on an analysis that adjusts abnormally high P/E ratios in a manner that reduces his CAPM estimate (the Building Blocks approach to developing the Equity Risk Premium), ${ }^{32}$ and at the same time relies on DCF estimates that do not recognize or adjust for the abnormal expansion in P/E ratios for his proxy companies. If Dr. Woolridge were to adjust his DCF results for abnormal P/E ratios, stock prices would decrease, which would increase his dividend yields and DCF results.

## Q. Please summarize Dr. Woolridge's reference to a March 2015 report by Moody's regarding the effect of ROEs on utilities' near-term credit profiles.

A. Dr. Woolridge points to the March 2015 Moody's report and concludes (among other things) that lower authorized ROEs are not impairing utilities' credit profiles, and are not "deterring them from raising record amounts of capital." ${ }^{33}$ Dr. Woolridge further states that the Moody's article "supports the prevailing/emerging belief that lower authorized ROEs are unlikely to hurt the financial integrity of utilities or their ability to attract capital."34

[^18]
## Q. What is your response to Dr. Woolridge in that regard?

A. The Moody's article makes clear that utilities' cash flow have benefited from increased deferred taxes, which themselves are due to bonus depreciation. ${ }^{35}$ As Moody's noted, the rise in deferred taxes eventually will reverse. ${ }^{36}$ That may be one reason that the Moody's study refers to "near-term credit profiles". In the longer-term, utilities will not have the benefits of bonus depreciation to offset lower authorized returns.

Lastly, Moody's observed that although interest rates remained at relatively low levels, they "will go up, eventually." When they do, Moody's warns, "this could spell trouble for utilities." Moody’s concludes, "[f]or now, utilities can enjoy their (historically) high equity valuations in terms of dividend yield and price-earnings ratios."37 That is, in March 2015, Moody's observed that the then-current valuations were unusual, and that some degree of reversion toward long-term means was likely. For the electric utility sector, that was the case, as the S\&P Electric Utility Index P/E ratio fell from 18.06 on February 2, 2015 to 15.57 on July 1, 2015. ${ }^{38}$ That observation is consistent with a point made earlier in my Rebuttal Testimony: unusually high P/E ratios are unlikely to persist and, therefore, Dr. Woolridge's approach of giving primary weight to his Constant Growth DCF estimates should be viewed with considerable caution.

[^19]Q. Do you have any observations regarding cost recovery mechanisms supporting elevated $\mathrm{P} / \mathrm{E}$ ratios?
A. Yes. Dr. Woolridge further argues that the Moody's article supports the notion that elevated P/E ratios are a result of cost recovery mechanisms reducing utilities' risk. ${ }^{39}$ As a preliminary matter, neither the article nor Dr. Woolridge provides any evidence or analysis to support the claim that cost recovery mechanisms have led to higher P/E multiples. To be clear, Moody's does not state that the cause of higher P/E multiples is cost recovery mechanisms. As stated in my Direct Testimony, the Federal Reserve’s monetary policy actions intentionally lowered long-term interest rates (another of the factors cited in the Moody's article) and have affected utility P/E ratios. ${ }^{40}$ In any case, as noted above, electric utility P/E ratios declined by nearly 15.00 percent shortly after the Moody's article was published.
Q. Do you have any concerns with Dr. Woolridge's belief that analysts' projections are consistently biased?
A. Yes, I do. Dr. Woolridge asserts that there is an upward bias in analysts' growth estimates and as such, "the DCF growth rate will provide an overstated equity cost rate." ${ }^{41}$ His position, however, is based on observations with respect to the broad market. Dr. Woolridge has provided no evidence that any of the growth rates used in my (or for that matter, his) DCF analyses are the result of a consistent and pervasive bias on the part of the analysts providing those projections. Despite his view that they are biased, Dr. Woolridge states that it was by

[^20]"giving primary weight to the projected EPS growth rate of Wall Street analysts" that he arrived at his assumed growth rates. ${ }^{42}$

## Q. What is your response to Dr. Woolridge in that regard?

A. There is no reason to believe that the analyst growth rates used in our respective DCF analyses are biased. As a practical matter, the October 2003 Global Research Analyst Settlement required financial institutions to insulate investment banking from analysis, prohibited analysts from participating in "road shows," and required the settling financial institutions to fund independent third-party research. ${ }^{43}$ I have reviewed the Letters of Acceptance, Waiver and Consent signed by financial institutions that were party to the Global Settlement, and found no reference to misconduct by analysts following the utility sector.

Moreover, pursuant to Regulation AC, which became effective in April 2003, analysts must certify that "...the views expressed in the report accurately reflect his or her personal views, and disclose whether or not the analyst received compensation or other payments in connection with his or her specific recommendations or views." ${ }^{44}$ I further understand that industry practice is to avoid conflicts of interest by ensuring that compensation is not directly or indirectly linked to the opinions contained in those reports. Dr. Woolridge has not explained why any of the analysts covering our respective proxy companies would bias their projections in light of those certification requirements.

[^21]Q. Is the use of analysts' earnings growth projections in the DCF model supported by financial literature?
A. Yes, it is. As noted in my Direct Testimony, a number of published articles support the use of analysts' earnings growth projections in the DCF model. ${ }^{45}$ Dr. Robert Harris, for example, demonstrated that financial analysts' earnings forecasts (referred to in the article as "FAF") in the Constant Growth DCF formula are an appropriate method of calculating the expected MRP. ${ }^{46}$ In that regard, Dr. Harris noted that:
... a growing body of knowledge shows that analysts' earnings forecasts are indeed reflected in stock prices. Such studies typically employ a consensus measure of FAF calculated as a simple average of forecasts by individual analysts. ${ }^{47}$

Dr. Harris further noted that:
Given the demonstrated relationship of FAF to equity prices and the direct theoretical appeal of expectational data, it is no surprise that FAF have been used in conjunction with DCF models to estimate equity return requirements. ${ }^{48}$

Similarly, in Estimating Shareholder Risk Premia Using Analysts Growth Forecasts, Harris and Marston presented "estimates of shareholder required rates of return and risk premia which are derived using forward-looking analysts' growth forecasts." ${ }^{49}$ Harris and Marston reported that:
... in addition to fitting the theoretical requirement of being forwardlooking, the utilization of analysts' forecasts in estimating return

[^22]requirements provides reasonable empirical results that can be useful in practical applications. ${ }^{50}$

Here again, the finding was clear: analysts’ earnings forecasts are highly related to stock price valuations and are appropriate inputs to stock valuation and ROE estimation models. ${ }^{51}$
Q. Do you agree with Dr. Woolridge's assertion that the "DCF growth rate will provide an overstated equity cost rate"? ${ }^{52}$
A. No, I do not. First, if current stock prices (and therefore the dividend yield) already reflect analysts’ bias, it is unclear why it is necessary to adjust the growth rate. In addition, although Dr. Woolridge asserts that "...long-term EPS growth rate forecasts of Wall Street securities analysts are overly optimistic and upwardly biased" ${ }^{53}$ in general, he has not demonstrated that to be true for the electric companies in our proxy groups, in particular. To that point, I reviewed quarterly earnings presentations for several of the companies in Dr. Woolridge's proxy group and found that the analysts' growth rate projections were consistent with the long-term growth rate ranges provided by the companies’ management teams (see Table 3, below). I therefore disagree that the earnings projections included in our respective analyses are likely to be systemically biased.

## Table 3: Analysts' Earnings Growth Projections Relative to Management Presentations ${ }^{54}$

[^23]| Company | Ticker | Zacks <br> Earnings <br> Growth | First Call <br> Earnings <br> Growth | Value Line <br> Earnings <br> Growth | Investor <br> Presentation <br> Earnings Growth |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Alliant Energy Corporation | LNT | $5.50 \%$ | $6.00 \%$ | $6.00 \%$ | $5.00 \%-7.00 \%$ |
| American Electric Power <br> Company, Inc. | AEP | $5.40 \%$ | $1.90 \%$ | $5.00 \%$ | $5.00 \%-7.00 \%$ |
| Avista Corporation | AVA | NA | $5.65 \%$ | $5.00 \%$ | $4.00 \%-5.00 \%$ |
| CMS Energy Corporation | CMS | $6.00 \%$ | $7.27 \%$ | $6.00 \%$ | $6.00 \%-8.00 \%$ |
| PNM Resources, Inc. | PNM | $5.30 \%$ | $6.85 \%$ | $9.00 \%$ | $7.00 \%-8.00 \%$ |
| SCANA Corporation | SCG | $5.70 \%$ | $6.03 \%$ | $4.50 \%$ | $4.00 \%-6.00 \%$ |
| Xcel Energy Inc. | XEL | $5.40 \%$ | $5.65 \%$ | $5.50 \%$ | $4.00 \%-6.00 \%$ |

## Q. Do you agree with Dr. Woolridge that dividend and book value growth rates

 are appropriate measures of expected growth for the Constant Growth DCF model? ${ }^{55}$A. No, I do not. Schedule RBH-R11 illustrates that, under the strict assumptions of the Constant Growth DCF model, earnings, dividends, book value, and stock prices all grow at the same, constant rate in perpetuity. In addition, Value Line is the only service on which Dr. Woolridge relies that provides DPS, BVPS, or Sustainable Growth projections. To the extent that the earnings projections services such as Zacks and First Call represent consensus estimates, the results are less likely to be skewed in one direction or another as a result of an individual analyst.

In any event, academic research clearly has indicated that measures of earnings are

[^24]strongly related to stock valuation. ${ }^{56}$ As discussed below, that conclusion holds true for the Value Line universe of electric utilities. Consequently, dividend and book value growth should not be used in the application of the Constant Growth DCF model. Rather, projected earnings growth rates are the appropriate measure of long-term growth.
Q. Do you agree with Dr. Woolridge that historical growth rates are appropriate measures of expected growth for the Constant Growth DCF model? ${ }^{57}$
A. No, I do not believe that historical growth rates are appropriate for the Constant Growth DCF model.

## Q. Have you conducted any analyses to determine which measures of growth are statistically related to the proxy companies' stock valuation levels?

A. Yes, I have. I performed a series of regression analyses in which the historical and projected growth rates were included as explanatory variables, with the $\mathrm{P} / \mathrm{E}$ ratio as the dependent variable. The intent of those analyses was to determine whether or not historical and projected earnings, retention and dividend growth rates are statistically related to the companies' valuation levels.

[^25]
## Q. What did those analyses reveal?

A. As shown in Schedule RBH-R12, the results indicate that the only positive statistically significant variable was the projected EPS growth rate. That is, none of the historical or projected DPS growth rates, nor projected retention growth rates, have a positive statistically significant relationship to valuation levels. Since the DCF model defines stock prices as a function of growth rates, only those growth rates that have a strong theoretical and empirical relationship to valuation levels should be used in the analysis. Consequently, projected EPS growth rates are the appropriate measure of growth for the purpose of the DCF models.

## Q. Is it possible to replicate Dr. Woolridge's DCF analysis?

A. No, it is not. Although Dr. Woolridge reviews historical and projected measures of growth for each of his proxy companies, his growth rate estimates rely on his subjective judgment as to what may or may not be representative of sustainable long-term growth. As such, Dr. Woolridge's analyses cannot be replicated. Whereas utility analysts often research the factors that fundamentally influence a given company's long-term growth, Dr. Woolridge instead selects his long-term growth estimate based on a summary review of earnings, dividend, and retention growth estimates. In effect, Dr. Woolridge has substituted his subjective judgment for those of utility analysts, who based their growth rate projections on detailed, fundamental analyses.
Q. Please provide examples of the type of information utility analysts review in assessing a company's growth potential.
A. One of the companies in Dr. Woolridge's proxy group is American Electric Power ("AEP"). On January 28, 2016, AEP held a conference call to review its fourth quarter earnings. ${ }^{58}$ Analysts from several firms attended that call, including:

- Barclays Capital
- Evercore
- Jeffries \& Co.
- JPMorgan

[^26]- Glenrock Associates
- KeyBanc
- UBS

During the course of that call, the analysts asked questions and were given answers regarding a number of issues that bear directly on the factors that determine the Return on Common Equity, including:

- Increasing leverage on certain subsidiaries;
- Growth in sales forecasts for shale plays;
- EPS and cash flow guidance for 2016;
- Incremental earnings and legal issues associated with AEP's purchase power agreement ("PPA");
- Capital Expenditure plans;
- Expectations for future tax amounts;
- Breakdown of load growth by customer class;
- Estimated ROE for the Transmission segment in 2016; and
- Sale completion date of the Merchant business ${ }^{59}$

In the first quarter (2016) call (which took place on April 28, 2016), analysts were provided with updated and additional information. During the course of the call, the company's management reiterated its earnings growth targets, and the various regulatory environments in which it operates. After the company's presentation, the analysts asked questions along several lines, included:

[^27]- Potential re-regulation of PPA assets;
- Political developments in Ohio and the upcoming federal election;
- Effect of the PPA on growth targets;
- Tax issues in the state of Louisiana;
- Potential degradation of returns of various operating subsidiaries;
- Guidance for operations and maintenance ("O\&M") growth going forward; and
- Comments surrounding the recent Senate energy bill. ${ }^{60}$

In its earnings conference call to review second quarter (2016) earnings, the company's management reiterated its long-term earnings growth target. After the company's presentation, analysts asked questions along several lines, all of which are relevant to Dr. Woolridge's construct. Examples of such topics include:

- Industrial customer sales trends;
- AEP's plan for meeting sales growth targets;
- Maintaining credit metrics such as funds from operations ("FFO")-to-debt and debt-to-EBITDA;
- Expectations for renewable generation projects within the Generation and Marketing segment;
- Regulatory preference for investment in generation or PPAs;
- AEP's recent tax audit and potential implication for future taxes; and
- Transmission investment plans. ${ }^{61}$

[^28]In the case of just one of Dr. Woolridge's proxy companies, therefore, the level of fundamental research performed by analysts on issues that directly bear on long-term growth far exceed his review of growth estimates. In my view, by estimating growth by selectively reviewing a range of long-term growth estimates when observable analyst growth rate forecasts are readily available, Dr. Woolridge has introduced a level of measurement error that is unnecessary and unsupported.

## Q. Do you have any concerns with the projected analysts' EPS growth rates

 relied on by Dr. Woolridge?A. Yes. In determining his projected analysts' EPS growth rate, Dr. Woolridge includes negative growth estimates. In doing so, Dr. Woolridge has implicitly assumed that investors would consider committing capital to a company that is expected to have negative growth, in perpetuity. As Schedule RBH-R13 demonstrates, eliminating negative growth rates from Dr. Woolridge's DCF analysis increases the mean projected EPS growth rate by 70 basis points. However, given that Dr. Woolridge's 5.00 percent growth rate is based on his subjective judgment, it is difficult to say how removing negative growth rates would affect his analyses and recommendation.

## D. Application of the CAPM

Q. Please briefly describe Dr. Woolridge's CAPM analysis and results.
A. Dr. Woolridge's CAPM analysis produces an estimated Cost of Equity of 7.90 percent. ${ }^{62}$ Although Dr. Woolridge relies primarily on his DCF analysis, he also considers his CAPM results in determining what he considers an appropriate range of the Company's Cost of

[^29]Equity. ${ }^{63}$ As with Dr. Woolridge's DCF results, I strongly disagree that a CAPM result of 7.90 percent is a reasonable estimate of the Company's ROE. As discussed below, Dr. Woolridge's unduly low CAPM estimate primarily is the result of his estimated MRP.

## Q. Please describe how Dr. Woolridge calculates his MRP estimate.

A. Dr. Woolridge reviews a series of studies that calculate the MRP using different methodologies; he also considers the results of his "Building Blocks" approach. Based on those reviews, Dr. Woolridge concludes that the MRP ranges from 4.00 percent to 6.00 percent and, within that range, 5.50 percent is reasonable. ${ }^{64}$
Q. Do any of the authors cited in Woolridge's Equity Risk Premium survey provide support for your approach to estimating the current MRP?
A. Yes. A study by Pablo Fernandez titled "Market Risk Premium used in 71 countries in 2016: a survey with 6,932 answers" discusses how the required Equity Risk Premium is commonly calculated using a Constant Growth DCF approach. ${ }^{65}$ That study states:
[t]he [implied equity premium] is the implicit [required equity premium] used in the valuation of a stock (or market index) that matches the current market price. The most widely used model to calculate the [implied equity premium] is the dividend discount model: the current price (P0) is the present value of expected dividends discounted at the required rate of return (Ke). If d 1 is the dividend per share expected to be received in year 1 , and g the expected long term growth rate in dividends per share:

$$
\mathrm{P}_{0}=\mathrm{d}_{1} /(\mathrm{Ke}-\mathrm{g}) \text {, which implies: }
$$

[^30][implied equity premium] $=\mathrm{d}_{1} / \mathrm{P}_{0}+\mathrm{g}-\mathrm{R}_{\mathrm{f}}{ }^{66}$
As discussed in my Direct Testimony, I calculated the ex-ante MRP in a similar manner using a market capitalization weighted Constant Growth DCF calculation on the individual companies in the S\&P 500 Index.
Q. Do you have any other observations regarding Dr. Woolridge's Equity Risk

## Premium estimates?

A. Yes. Many of Dr. Woolridge’s Equity Risk Premium estimates assume market returns equal to or below the Company's required return and do not make either theoretical or practical sense. For example, his Exhibit JRW-11, page 5 of 6, indicates that the average estimated Equity Risk Premium over all the articles included in the survey is 4.64 percent. Combining that estimate with Dr. Woolridge’s 4.00 percent estimated Risk-Free Rate (Exhibit JRW-11, page 1 of 6) produces an estimated market return of 8.64 percent, which is eleven basis point below Dr. Woolridge's 8.75 percent recommendation.

Dr. Woolridge observes that "...a regulated public utility is less risky than the market," and should have a Beta coefficient less than 1.0. ${ }^{67}$ Because his implied 8.64 percent market return is eleven basis points below to his 8.75 percent ROE recommendation, its relevance to investors' actual required returns is questionable. Even focusing on studies from 2010 to 2015 (Exhibit JRW-11, page 6 of 6), the expected market return would be approximately 8.88 percent, which is only 13 basis points above Dr. Woolridge's 8.75 percent recommendation for Ameren Missouri. Because such important elements of his CAPM analyses contradict each other, Dr. Woolridge's CAPM results are not reliable.

[^31]
## E. Market-To-Book Ratios and the Cost of Equity

Q. Please briefly summarize Dr. Woolridge's position regarding the relationship between Market-to-Book ("M/B") ratios and the Cost of Equity.
A. Dr. Woolridge suggests that $\mathrm{M} / \mathrm{B}$ ratios in excess of unity (i.e., above 1.00) indicate that the subject company's earned Return on Equity exceeds its Cost of Equity. ${ }^{68}$ In support of that position, Dr. Woolridge provides a series of three regression analyses reflecting the relationship between the Return on Equity and M/B ratios for electric, natural gas, and water utilities, respectively. Because the Coefficient of Determination (sometimes referred to as the "R-squared") ranges from 77.00 percent in the case of electric utilities, to 56.00 percent in the case of natural gas utilities, Dr. Woolridge concludes that there is a "strong positive relationship" between M/B ratios and the ROE for utilities. ${ }^{69}$
Q. Do M/B ratios above 1.00 necessarily suggest that authorized ROEs have

## been too high?

A. No, they do not. First, it is important to note that the M/B ratio equals the market value (or stock price) per share, divided by the total common equity (or the book equity) per share. Book value per share is an accounting construct, which reflects historical costs. In contrast, market value per share (i.e., the stock price) is forward-looking, and a function of many variables, including (but not limited to) expected earnings and cash flow growth, expected payout ratios, measures of "earnings quality", the regulatory climate, the equity ratio, expected

[^32]capital expenditures, and the earned return on common equity. ${ }^{70}$
$\mathrm{M} / \mathrm{B}$ ratios in excess of unity simply means that the firm is worth more as a going concern than the book value of its assets. If Dr. Woolridge is of the view that $\mathrm{M} / \mathrm{B}$ ratios in excess of unity reflect earned returns in excess of the Cost of Equity, it would follow that he also is of the view that utility commissions consistently authorize returns in excess of the Cost of Equity. To put the issue in context, the M/B ratio for the companies in the Dow Jones Utility Index, as well as Dr. Woolridge's proxy group have been well in excess of 1.00 since at least 2000 (see Chart 4, below).

Chart 4: Market/Book Ratios Over Time ${ }^{71}$



[^33]Dr. Woolridge does not provide any additional support for his position beyond the general observation that M/B ratios for electric utilities have been greater than 100.00 percent. As such, I disagree with his conclusion.

The notion that book values should be set at a value approaching unity by regulatory commissions has been refuted for many years. As noted by Stewart Myers in 1972: "In short, a straightforward application of the cost of capital to a book value rate base does not automatically imply that market and book values will be equal. This is an obvious but important point. If straightforward approaches did imply equality of market and book values, then there would be no need to estimate the cost of capital. It would suffice to lower (raise) allowed earnings whenever markets were above (below) book [emphasis added]."72

In addition, as Dr. Morin states, it is very rare in cost of service regulation that M/B ratios equal 1.00:

The third and perhaps most important reason for caution and skepticism is that application of the DCF model produces estimates of common equity cost that are consistent with investors' expected return only when stock price and book value are reasonably similar, that is, when the M/B is close to unity. As shown below, application of the standard DCF model to utility stocks understates the investor's expected return when the market-to-book (M/B) ratio of a given stock exceeds unity. This was particularly relevant in the capital market environment of the 1990s and 2000s whose utility stocks are trading at M/B ratios well above unity and have been for nearly two decades. The converse is also true, that is, the DCF model overstates the investor's return when the stock's M/B ratio is less than unity. The reason for the distortion is that the DCF market return is applied to a book value rate base by the regulator, that is, a utility's earnings are limited to earnings on a book value rate base. ${ }^{73}$

[^34]Because the Constant Growth DCF model traditionally used in rate regulation assumes a M/B of unity, it would understate investors' required rate of return when market value exceeds book value. It would do so because investors evaluate and receive their returns on the market value of a utility's equity, whereas regulators authorize returns on book common equity. Consequently, the market-based DCF model will result in a total annual dollar return on book common equity equal to the total annual dollar return expected by investors only when market and book values are equal, a rare and unlikely situation.

Lastly, although the earned Return on Equity may be one factor explaining M/B ratios, it is not the only factor. If it were, the regression equations presented in Dr. Woolridge's Exhibit JRW-6 would produce reasonable ROE estimates when the M/B ratio equals unity.
Q. In that regard, have you reviewed the ROE and M/B ratio data provided in Exhibit JRW-6?
A. Yes, I have updated the chart contained in Exhibit JRW-6, Panel A (Electric Companies), including the regression coefficients, using recent data from Value Line in Chart 5 (below). Chart 5: Update of Exhibit JRW-6, Panel A, With Regression Coefficients ${ }^{74}$


Based on that data, an M/B ratio of 1.00 is associated with an ROE of just 4.44 percent. ${ }^{75}$ That estimate is 95 basis points below the Company's cost of debt (i.e., 5.39 percent). In other words, for the $\mathrm{M} / \mathrm{B}$ ratio to equal 1.00, the Cost of Equity would be below the cost of debt, a condition that is highly improbable and would be financially threatening to a utility if it existed. Dr. Woolridge's own data therefore do not support his theory that ROEs in excess of unity indicate that the subject company's return exceeds investors' required returns.
Q. Have you analyzed whether the actual earned Return on Equity explains the M/B ratios for Dr. Woolridge's proxy group?
A. Yes, I have. Based on data from SNL Financial, I performed a regression analysis in which the $\mathrm{M} / \mathrm{B}$ ratio was the dependent variable, and the most recent twelve-month Return on Average Common Equity ("ROACE") was the explanatory variable. As shown in Schedule

[^35]RBH-R14, the R-squared was approximately 34.00 percent (the coefficients and equation were statistically significant). Thus, other factors explain up to 66.00 percent of $\mathrm{M} / \mathrm{B}$ ratios for Dr. Woolridge's proxy group. ${ }^{76}$ Those results support the position that although the earned return on equity is a factor that explains $\mathrm{M} / \mathrm{B}$ ratios, it is not the only factor. In any case, the regression equation indicates that a $\mathrm{M} / \mathrm{B}$ ratio of 1.00 is associated with a Return on Common Equity of 0.79 percent; an M/B ratio of 1.10 relates to an ROACE of 1.94 percent. Because those estimates are far below the Company's 5.39 percent cost of debt, I do not agree that M/B ratios in excess of unity demonstrate earnings in excess of investors' requirements.

## Q. Do you have any other points regarding this issue?

A. Yes. It is important to keep in mind that, like P/E multiples, M/B ratios tend to be used in practice as measures of relative, rather than absolute valuation. That is, investors often use $\mathrm{M} / \mathrm{B}$ ratios to value an individual company based on the average $\mathrm{M} / \mathrm{B}$ ratio of its peers. Such "market comparable" approaches to valuation are useful because no one financial model is accepted as the true measure of value at all times and under all conditions.

## F. Relative Risk

Q. Do you believe that credit ratings are an appropriate measure to determine the equity risk of Ameren Missouri relative to the proxy group? ${ }^{77}$
A. Although I agree in general that credit spreads are directionally related to the Cost of Equity, ${ }^{78}$ I do not agree that changes in one are a direct measure of changes in the other. Debt and equity are entirely different securities with different risk/return characteristics, different

[^36]lives, and different investors. Debt investors have a contractual, priority claim on cash flows not available to equity investors, and equity investors bear the residual risk of ownership. Moreover, because the life of debt is finite, debt investors' exposure to business and financial risk likewise is finite. On the other hand, equity is perpetual and equity investors are exposed to residual risk in perpetuity. Because debt and equity are distinct securities with different risk and return profiles, debt and equity investors themselves have different risk and return requirements. Any inferences drawn from changes in credit spreads for the Companies’ Cost of Equity should be drawn with caution.

A visible measure of the distinction of the risks to which debt and equity investors are exposed is the difference in their respective Beta coefficients. Although I disagree with his conclusions, Dr. Woolridge recommends average Beta coefficients of 0.70 for both of our proxy groups. ${ }^{79}$ Duff \& Phelps notes that as of December 2015, Beta coefficients for A-rated debt was negative $0.07 .^{80}$ That is, the Beta coefficients of A-rated debt are well below those of the equity Beta coefficients assumed by Dr. Woolridge. In fact, the debt Beta coefficients in the range of 0.45 to 0.55 are associated with Ba and B rated debt, both of which are considered to be below investment grade. ${ }^{81}$ Those differences are a clear indication that the risks assumed by debt investors are far different than those assumed by equity investors.

[^37]Q. Did you perform any analyses to determine whether Dr. Woolridge's data supports the assumption that there is a quantifiable difference in the Cost of Equity for companies with different bond credit ratings?
A. Yes, I did. I first produced Constant Growth DCF results for each of the comparison companies using the growth rates and dividend yields reported by Dr. Woolridge. I then applied "credit scores" to Dr. Woolridge's comparison companies by converting the S\&P bond ratings reported in his Direct Testimony to a numerical value. If there is a quantifiable relationship between the proxy companies' credit ratings and Cost of Equity, there should be a positive, statistically significant relationship between the credit score and the DCF results. That is, as credit quality deteriorates (resulting in a higher score), the Cost of Equity should increase. I therefore performed a regression analysis, in which the dependent variable was the DCF result, and the explanatory variable was the credit score.
Q. Did your analysis come to a different conclusion than Dr. Woolridge's?
A. Yes. As shown in Schedule RBH-R15, the regression analysis showed no statistically significant relationship between the two. In fact, the R-squared of the regression was only 0.045 , which indicates that credit ratings accounted for only 4.50 percent of the change in the DCF-estimated Cost of Equity.
Q. What conclusion do you reach after evaluating Dr. Woolridge's recommendation?
A. As shown in Chart 2, Dr. Woolridge's ROE recommendation is far below the national average return for vertically integrated electric utilities. Because his recommendation is so far removed from other authorized returns his recommendation is an outlier.

## III. RESPONSE TO OPC WITNESS GORMAN

Q. Please briefly summarize Mr. Gorman's recommendation regarding the

## Company's Cost of Equity.

A. Mr. Gorman recommends an ROE of 9.20 percent, within a recommended range of 9.00 to 9.40 percent. ${ }^{82}$ Mr. Gorman establishes his recommended ROE by reference to: (1) his constant growth DCF model using both consensus analyst growth rates and a sustainable growth rate (with median and average results ranging from 7.47 percent to 9.02 percent); ${ }^{83}$ (2) his Multi-Stage DCF method (with mean and median results of 7.89 percent and 7.99 percent, respectively); ${ }^{84}$ (3) his Risk Premium estimates ( 9.40 percent); ${ }^{85}$ and (4) his CAPM analyses (9.00 percent). ${ }^{86}$ In particular, Mr. Gorman's 9.20 percent recommendation represents the approximate midpoint of his range of results, set by reference to the results from the DCF and CAPM (9.00 percent) on the low end and the Risk Premium (9.40 percent) analyses on the high end. ${ }^{87}$
Q. What are the principal analytical areas in which you disagree with Mr. Gorman?
A. The principal analytical areas in which I disagree with Mr. Gorman include:

1. Proxy group composition;
2. The application of the Constant Growth DCF model, and interpretation of its results;
3. The MRP component of his CAPM analysis, in particular the expected market return

[^38]from which the MRP is calculated;
4. The assumptions and methods underlying Mr. Gorman's Risk Premium analyses;
5. Mr. Gorman's assessment of the Company's relative risk; and
6. Mr. Gorman's assessment of how his recommended ROE will affect the Company's financial integrity.

## A. Proxy Group Composition

Q. Do you agree with Mr. Gorman's exclusion of Otter Tail Corporation from the proxy group? ${ }^{88}$
A. No, I continue to include Otter Tail Corporation ("OTTR") in my analyses. Mr. Gorman excluded OTTR from his proxy group because analyst earnings growth rates estimates were not available from any of the data sources he relies on (Zacks, SNL Financial, and Reuters). Because two of the data sources I rely on for earnings growth estimates (Yahoo! Finance and Value Line) report earnings growth rates for OTTR, I continue to include the company in my proxy group.

## B. Constant Growth DCF Model

Q. As a preliminary matter, does Mr. Gorman give his Constant Growth DCF results any weight in arriving at his $\mathbf{9 . 2 0}$ percent ROE recommendation?
A. Yes, as noted earlier, Mr. Gorman's 9.20 percent recommendation represents the midpoint of his 9.00 percent to 9.40 percent recommended range. The bottom end of that range (9.00 percent) is based on Mr. Gorman's Constant Growth DCF median result of approximately

[^39]9.00 percent, ${ }^{89}$ and the upper bound ( 9.40 percent) represents the point estimate of his Risk Premium results. ${ }^{90}$

To arrive at his DCF estimate, Mr. Gorman discards his Multi-Stage DCF results (7.99 percent based on the median result), and his Constant Growth DCF model results based on the "sustainable growth" method (7.47 percent based on the median result) in favor of his Constant Growth DCF results based on analysts' growth rate projections (9.02 percent based on the median result). ${ }^{91}$ Because Mr. Gorman states that his recommendation is "primarily based" on his Constant Growth DCF results, and not his Multi-Stage or sustainable growth DCF methods, I will not comment on his application of those approaches in my Rebuttal Testimony.
Q. Do you have any concerns with the Constant Growth DCF model in general, and the weight that Mr. Gorman applies to those results in particular?
A. Yes, I do. The Constant Growth DCF model is based on several underlying assumptions that combine to establish an inverse relationship between expected growth and the dividend yield. That is, as expected growth increases, the price would increase and the dividend yield would decrease. Conversely, as expected growth decreases, the price would decrease and the dividend yield would increase. Mr. Gorman’s Constant Growth DCF analysis, however, assumes P/E ratios that are high by historical standards, (see Chart 6 below), but growth rates that are relatively low.

[^40]
Q. Are the growth rates assumed in Mr. Gorman's analysis consistent with

## historically high valuation levels?

A. No, they are not. Mr. Gorman's analysis assumes an average growth rate of 5.47 percent (see Schedule MPG-5) which, he notes, is well below the long-term compound average growth rate for the economy as a whole ( 6.20 percent), and the long-term rate of stock market capital appreciation (on geometric average basis, 5.80 percent). ${ }^{93}$ As discussed earlier, the Constant Growth DCF model assumes that low growth rates would be associated with low prices (and high dividend yields), yet the proxy group average $\mathrm{P} / \mathrm{E}$ ratio is well above its long-term average. In the context of the Constant Growth DCF model, the two are not compatible.

Mr. Gorman acknowledges that unsustainable expansions in P/E ratios create analytical concerns that should be addressed in determining the Cost of Equity. At page 50 of his direct testimony, Mr. Gorman discusses the MRP component of his CAPM, and explains that Ibbotson

[^41]\& Chen found an "abnormal expansion" of $\mathrm{P} / \mathrm{E}$ ratios relative to earnings and dividend growth. That is, Ibbotson \& Chen found that because higher P/E ratios during the 1980 to 2001 period were not explained by higher growth in earnings or dividends, their analyses required adjustment. ${ }^{94}$ Duff \& Phelps, the source referenced by Mr. Gorman, calculates an adjustment using three-year average $\mathrm{P} / \mathrm{E}$ ratios, rather than relying on the current year, because "the threeyear average allows the adjustment to smooth out the volatility of extraordinary events and allows earnings to better reflect a normalized trend [emphasis added]."95 As did Ibbotson, Duff \& Phelps recognized that abnormally high P/E ratios will produce questionable analytical results, and emphasized that the long-term trend is important.

The same conditions hold here. The utility sector has undergone an "abnormal expansion" in P/E ratios; there is no dispute on that point. Whereas Duff \& Phelps recognized and adjusted its analyses to reflect the abnormal expansion in P/E ratios, Mr. Gorman's DCF analyses and his interpretation of their results do not. Therefore, Mr. Gorman's DCF analysis understates the current ROE for Ameren Missouri.

Lastly, if Mr. Gorman's position is that the current P/E ratio will sustain itself over the long-run, I have addressed that concern by calculating the terminal value portion of the MultiStage DCF model by reference to current P/E ratios. ${ }^{96}$
Q. Please summarize your concerns with Mr. Gorman's use of a sustainable long-term growth in his DCF analysis.
A. Although we agree that it is appropriate to rely on analyst earnings growth

[^42]estimates in applying the Constant Growth DCF model, Mr. Gorman asserts that those estimates should be limited to what he considers to be a reasonable estimate of long-term "sustainable" growth.

As noted in my response to Dr. Woolridge, prior academic research indicates that investors rely on analysts' earnings growth projections. In addition, the Commission has found the use of analysts' growth rates in the DCF model reasonable in past cases. ${ }^{97}$ Although Mr. Gorman may be of the view that analyst growth rates are not sustainable, the relevant issue in rate cases is whether investors rely on those projections in making their investment decisions. The projections prepared by analysts reflect widely held expectations that influence investors at the time they make their pricing decisions, i.e., the market prices investors are willing to pay. I am not aware of empirical evidence supporting the position that investors would disregard analysts' estimates of growth in EPS for the companies in our respective proxy groups, nor has Mr. Gorman provided any such evidence. Rather, the academic research discussed above supports the use of analysts' earnings growth projections. I therefore disagree with Mr. Gorman's conclusion that his subjective view of sustainable growth, rather than analysts' projections, is the more relevant measure of investor expectations.

## C. Application of Capital Asset Pricing Model

Q. Please briefly summarize Mr. Gorman's CAPM analysis and results.
A. Mr. Gorman's two CAPM estimates (8.97 and 7.69 percent) are based on two measures of principally historical Market Risk Premium estimates: (1) Blue Chip’s projected

[^43]30 -year Treasury yield of 3.40 percent as the risk-free rate; ${ }^{98}$ and (2) an average Beta coefficient of 0.71 , as reported by Value Line. ${ }^{99}$ Based on his assessment of risk premiums in the current market, Mr. Gorman relies on the high-end rounded to 9.00 percent CAPM when estimating Ameren Missouri Cost of Equity. ${ }^{100}$ Mr. Gorman's analyses assume MRP estimates of 7.80 percent (based on the long-term historical arithmetic average real market return from 1926 through 2015 as reported by Duff \& Phelps, adjusted for current inflation forecasts), and 6.00 percent (based on the historical difference between the average return on the S\&P 500 and the average total return on long-term government bonds). ${ }^{101}$ Combining those MRP estimates with his projected long-term risk-free rate, Mr. Gorman develops expected market returns in the range of 9.40 to 11.20 percent. ${ }^{102}$
Q. Turning first to the expected total market return, do you agree with

## Mr. Gorman's 9.40 and $\mathbf{1 1 . 2 0}$ percent estimates?

A. No, I do not. As a practical matter, Mr. Gorman's 9.40 percent estimate, which is 255 basis points below the long-term average market return, falls in the bottom $9^{\text {th }}$ percentile of the 90 annual returns reported by Morningstar. ${ }^{103}$ His 11.20 percent estimate, which I believe is more reasonable, still falls in the bottom $24^{\text {th }}$ percentile.

A helpful perspective on the historical market return is the rolling 50-year average annual market return. As Mr. Gorman points out, from 1926 through 2015 the arithmetic average

[^44]market return was 12.00 percent. ${ }^{104}$ Over the 50 years ended 2015 , the average return was 12.10 percent, only ten basis points removed from the longer-term average that Mr. Gorman reports. Over time, the fifty-year average return has been quite consistent, in the range of approximately 12.00 percent (see Chart 7, below).

Chart 7: 50-Year Rolling Average Market Return (1976 - 2015) ${ }^{\mathbf{1 0 5}}$


Taken from that perspective, Mr. Gorman's 9.40 percent expected market return is well below the long-term market experience, and, therefore, is not reasonable.

## Q. Did you make any adjustments to Mr. Gorman's CAPM?

A. Yes. As discussed above, although Mr. Gorman's market return of 11.20 percent is more reasonable than his lower estimate, as shown in Chart 7, it is still low relative to the historical market return. As such, I recalculated his CAPM analysis using more reasonable estimates of the market return. The first method is the average of his 11.20 percent estimate and the lower of my two updated market return estimates (see Schedule RBH-R3) of 12.60 percent

[^45]from Bloomberg Professional (i.e., 11.90 percent). I relied on Mr. Gorman’s average Beta coefficient and risk-free rate. I then calculated his CAPM analysis based on the average market returns from Bloomberg Professional and Value Line presented in Schedule RBH-R3. The results of those analyses are provided in Table 4, below.

## Table 4: Mr. Gorman Updated CAPM Results

| Scenario | Result |
| :--- | :---: |
| As filed - 9.40\% Market Return | $7.69 \%$ |
| As filed - 11.20\% Market Return | $8.97 \%$ |
| Average Gorman High, Hevert Low - <br> $11.90 \%$ Market Return |  |
| Average Hevert Market Return - <br> $13.22 \%$ Market Return |  |

The updated results in Table 4 are more reasonable estimates of the Company's ROE and are within the range of recently authorized returns.

## D. Application of the Risk Premium Model

## Q. Please briefly describe Mr. Gorman's Risk Premium analyses.

A. Mr. Gorman defines the "Risk Premium" as the difference between average annual authorized equity returns for electric utilities, and a measure of long-term interest rates each year from 1986 through September 2016. ${ }^{108}$ Mr. Gorman’s first approach calculates the annual risk premium by reference to the 30-year Treasury yield, and his second approach considers the average A-rated utility bond yield. ${ }^{109}$ In each case, Mr. Gorman establishes his risk

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9.44% = 3.40% + 0.71 * (11.90% - 3.40%).
10.37% = 3.40% + 0.71 * (13.22% - 3.40%).
Direct Testimony of Michael P. Gorman, at 40.
See Direct Testimony of Michael P. Gorman, 40-41, Schedule MPG-13 and MPG-14.
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premium estimate by reference to five-year and ten-year rolling averages. The lower and upper bounds of Mr. Gorman’s Risk Premium range are defined by the lowest and highest rolling average, respectively, regardless of the year in which those observations occurred. ${ }^{110}$

Regarding the period over which he gathers and analyzes his data, Mr. Gorman suggests that his 31-year horizon is a "generally accepted period to develop a risk premium study using 'expectational' data." ${ }^{111}$ On page 42 of his direct testimony Mr. Gorman further states that "it is reasonable to assume that averages of annual achieved returns over long time periods will generally converge on the investors’ expected returns," and concludes that his "risk premium study is based on expectational data, not actual investment returns, and, thus, need not encompass a very long historical time period." ${ }^{112}$ Based on those assumptions, Mr. Gorman calculates a range of risk premium estimates of 4.25 percent to 6.75 percent using his Treasury bond analysis, and 2.88 percent to 5.58 percent using his A-rated utility bond analysis. Combined with a 3.40 percent projected Treasury yield and a 4.38 percent Baa-rated utility bond yield estimate, Mr. Gorman's Risk Premium analysis produces results ranging from 7.26 percent to 10.15 percent. ${ }^{113}$ To calculate his Risk Premium-based ROE estimate, Mr. Gorman gives 75.00 percent weight to the high end of his risk premium estimates, and 25.00 percent to the low end, producing a range of 9.30 percent to 9.50 percent, from which Mr. Gorman selects a midpoint of 9.40 percent. ${ }^{114}$

[^46]Q. Do you have any general concerns with Mr. Gorman's Risk Premium estimates and their effect on his overall ROE recommendation?
A. Yes, I do. In assessing his DCF analyses, Mr. Gorman decided to rely on his highest result and essentially discarded four of his six results, which ranged from 7.47 percent to 7.99 percent. ${ }^{115}$ However, in his Risk Premium analysis, Mr. Gorman retained risk premiums that produced ROE estimates that were 34 basis points below the DCF estimates that he chose not to rely on. Despite their low levels, Mr. Gorman gave those risk premium estimates (producing ROE results of 7.26 and 7.65 percent) weights of 25.00 percent in aggregate. Mr. Gorman offers no explanation as to why he would exclude DCF results of 7.99 percent and lower, yet include Risk Premium results of 7.26 percent and 7.65 percent. ${ }^{116}$ If Mr. Gorman had not given any weight to his unduly low risk premium estimates (as he did in his DCF analysis), his range would increase to 9.96 percent ${ }^{117}$ to 10.15 percent. ${ }^{118}$ This shows the inconsistency in and the subjective nature of his Risk Premium analysis.
Q. What are your specific concerns with Mr. Gorman's Risk Premium analysis?
A. I have three concerns with his analysis: (1) Mr. Gorman's method understates the required risk premium in the current market because it ignores an important relationship confirmed by his own data, i.e., that the risk premium is inversely related to the level of interest rates (whether measured by Treasury or utility bond yields); (2) the low end of Mr. Gorman's Risk Premium results (i.e., 7.26 and 7.65 percent) is far lower than any ROE authorized since at least 1986 and as such, has no relevance in estimating the Company's Cost of Equity; and

[^47](3) Mr. Gorman suggests that a Market/Book ratio of 1.00 is a relevant benchmark for assessing authorized ROEs. ${ }^{119}$
Q. Turning first to the issue of $M / B$ ratios, as discussed on page 40 of his direct testimony, do you agree with Mr. Gorman that M/B ratios should be used to assess the reasonableness of ROE recommendations?
A. Although Mr. Gorman frames his discussions in the context of authorized returns that "were sufficient to support market prices that at least exceeded book value," ${ }^{120}$ he does not suggest whether the $M / B$ ratio should exceed some level, or even explain the extent of the relationship between authorized returns and $\mathrm{M} / \mathrm{B}$ ratios. As discussed in my response to Dr. Woolridge, I do not believe that M/B ratios should serve as a measure of the sufficiency of authorized returns.

## Q. What problems did you find in Mr. Gorman's Risk Premium analyses?

A. Mr. Gorman failed to consider the inverse relationship between interest rates and the Equity Risk Premium, which artificially depresses his Risk Premium ROE recommendation. Considering first the Treasury yield-based analysis, I plotted the yields and Risk Premia over the 1986 to 2016 period included in Mr. Gorman's analysis. That graph, which is presented in Chart 8 (below), clearly indicates the inverse relationship between interest rates and the Equity Risk Premium.

[^48] Chart 8: Mr. Gorman's Treasury Yield-Based Risk Premium Data ${ }^{121}$


There are several other points made clear in Chart 8. First, the low end of Mr. Gorman's Risk Premium range, 4.25 percent, was observed in the five-year period ending 1991. There is little question that Risk Premium estimates associated with economic environments 25 years ago have little to do with current market conditions. A very visible measure of such differences is the fact that before 2002, Treasury yields exceeded the Risk Premium (on a five-year average basis). Since then, as Chart 8 (see also Schedule RBH-R16) demonstrates, the opposite has been true - the Risk Premium has consistently exceeded Treasury yields. By that measure alone, it is clear that the low end of Mr. Gorman's range has little, if any, relevance to the current market environment.

The high end of Mr. Gorman's range, 6.75 percent, occurred more recently (for the fiveyear period ending September 2016). In fact, Schedule MPG-13 indicates that his Equity Risk Premium averaged approximately 6.94 percent over the more recent period from 2015 through

[^49]September 2016. ${ }^{122}$ Adding that 6.94 percent Equity Risk Premium to Mr. Gorman’s projected Treasury yield of 3.40 percent produces an ROE estimate of 10.34 percent.

## Q. Has the Risk Premium increased as Treasury yields have decreased?

A. Yes. The relationship between the five-year average Equity Risk Premium and Treasury yields is very clear. A simple linear regression demonstrates that the two are highly related, with a Coefficient of Determination (R-Square) of approximately 96.00 percent. That is, Mr. Gorman's data demonstrate that changes in Treasury yields account for 96.00 percent of the change in the Equity Risk Premium (see Chart 9, below). ${ }^{123}$

## Chart 9: Treasury Yield vs. Equity Risk Premium (Five-Year Rolling Average) ${ }^{124}$



Turning back to Mr. Gorman's data, a simple linear regression analysis using annual

[^50](rather than the rolling average) data demonstrates that for every 100 basis point decrease in Treasury yields, the Equity Risk Premium increases by approximately 45 basis points (see Schedule RBH-R17). ${ }^{125}$ Similarly, the Equity Risk Premium increases approximately 45 basis points for every 100 basis point decrease in utility bond yields. Those results are consistent with those reported by Maddox, Pippert, and Sullivan, who determined that the Risk Premium would increase by 37 basis points for every 100 basis point decrease in the 30 -year Treasury yield. ${ }^{126}$

As noted in my Direct Testimony, I also have found that accounting for additional factors by incorporating the credit spread does not change the sign, statistical significance, or the magnitude of the slope coefficient. ${ }^{127}$ In other words, consideration of credit spreads does not change the finding that interest rates and the Equity Risk Premium are inversely related.
Q. What would Mr. Gorman's Risk Premium analysis results be had he relied on the inverse relationship shown in Chart 9 , above?
A. As shown on page 3 of Schedule RBH-R16, had Mr. Gorman recognized the inverse relationship between the Equity Risk Premium and Treasury yields in his Risk Premium analysis, his result would be 9.88 percent. Similarly, applying the same relationship to the utility bond yield data presented by Mr. Gorman, the result would be 9.65 percent. ${ }^{128}$
Q. What are your conclusions regarding Mr. Gorman's Risk Premium analysis?
A. Mr. Gorman's inclusion of rolling average estimates in his Risk Premium analysis does not negate the unreasonableness of his reliance on outdated and unrepresentative data. The market data upon which Mr. Gorman relies are so disconnected in time and substance from the

[^51]current environment that there is no reasonable basis for his conclusion that 9.40 percent represents a proper Risk Premium-based estimate of the Company's Cost of Equity. Consequently, it is appropriate to apply methods that have been accepted in published literature, and which reflect the finding that interest rates and the Equity Risk Premium move in opposite directions. Taking this finding into account leads to more reasonable ROE estimates that are consistent with authorized returns available to other vertically integrated electric utilities. ${ }^{129}$

## E. Risk Factors

Q. Please briefly summarize Mr. Gorman's assessment of the Company's overall business risk.
A. Mr. Gorman summarizes certain rating agency reports and concludes that utilities in general are seen as a low-risk sector, which has provided utilities "strong access to capital."130 Adopting an ROE as low as Mr. Gorman's recommendation (which is 86 basis points below the average authorized for vertically integrated electric utilities since 2013), however, would have the opposite effect of increasing the Company's regulatory risk and its cost of capital. Since 2013, there was only one authorized return for a vertically integrated electric utility as low Mr. Gorman’s recommended ROE (i.e., 9.20 percent).

## Q. Do the Company's current credit ratings distinguish it from other utilities?

A. No, they do not. As S\&P notes, the vast majority of utility ratings fall within the BBB to A- range. ${ }^{131}$ The Company's current credit rating of BBB+ falls within that range. If Mr. Gorman's point is that utilities in general are viewed as less risky than the overall market, I

[^52]agree. In fact, the Beta coefficients included in my CAPM analysis are less than 1.00, indicating less systematic risk than the overall market. That does not mean, however, that the return required for equity investments in vertically integrated electric utilities such as Ameren Missouri should be lower than the returns authorized for other vertically-integrated electric utilities around the country, as Mr. Gorman’s 9.20 percent ROE recommendation suggests.

## F. Financial Integrity

Q. Please briefly summarize Mr. Gorman's assessment of his recommendation as it affects measures of the Company's financial integrity.
A. Mr. Gorman evaluates the reasonableness of his ROE recommendation by calculating the pro forma effect that his recommended ROE would have on two of the Company's key financial ratios with the goal of assessing whether those ratios would still fall within S\&P's guideline ranges sufficient for an investment grade rating. ${ }^{132}$ In that regard, Mr. Gorman develops the following pro forma ratios: (1) Debt to EBITDA; and (2) FFO to Total Debt. An important point is that Mr. Gorman's analysis assumes that the Company actually will earn the entirety of its authorized ROE on a going-forward basis.

Mr. Gorman develops the pro forma financial ratios noted above based on the Company's retail cost of service, and his recommended ROE of 9.20 percent and equity ratio of 51.38 percent. Mr. Gorman notes that his pro forma financial analysis suggests that his recommended ROE of 9.20 percent would be sufficient to maintain "an investment grade bond rating." ${ }^{133}$

[^53]
## Q. Do you agree with Mr. Gorman's analysis and conclusion?

A. No, I do not. First, simply maintaining an "investment grade" rating is an inappropriate standard. According to Standard \& Poor's, only 6 of 221 utilities have had below investment grade ratings. ${ }^{134}$ Ameren Missouri must compete for capital within the utility sector in the first instance, and with companies beyond utilities, overall. If Mr. Gorman is of the view that simply maintaining an investment grade rating is sufficient for that purpose, I disagree. In my practical experience raising capital for a regulated utility, I can say firsthand that the competition for capital can be acute. Based on that practical experience, I also can say that Mr. Gorman's "investment grade" standard would frustrate, and potentially harm, the ability of Ameren Missouri (or any other regulated utility) to raise capital under a variety of market conditions, and at reasonable costs and terms.

That fundamental concern aside, I believe relying on Mr. Gorman's pro forma results to assess the credit supportiveness of any specific ROE or equity ratio is misplaced. In particular, I examined the robustness of using his pro forma credit metrics as a threshold benchmark by recreating the results in Mr. Gorman’s Schedule MPG-19. As shown in in Table 5 below, Mr. Gorman's pro forma analysis suggests that an ROE as low as 6.83 percent would be sufficient to achieve Debt to EBITDA and FFO to Total Debt ratios in the "Intermediate" range, as suggested by Mr. Gorman’s analysis. Clearly, however, a return of 6.83 percent, which is only 144 basis points above Ameren Missouri's cost of long-term debt, is an unrealistic estimate of the Company's Cost of Equity.

However, the usefulness of an analysis which suggests that an ROE as low as 6.83

[^54]percent (see Table 5, below) would be sufficient to achieve those metrics in Company's current "Intermediate" risk range is severely limited and provides no practical meaning as a check as to the appropriateness of Mr. Gorman’s recommended ROE.

Table 5: Mr. Gorman's Financial Integrity Test Using Alternate Assumptions ${ }^{135}$

|  | Debt / <br> EBITDA | $\begin{gathered} \text { FFO/ } \\ \text { DEBT } \end{gathered}$ |  |
| :---: | :---: | :---: | :---: |
| S\&P Benchmark Ranges |  |  |  |
| "Intermediate" | 2.5x-3.5x | 23\%-35\% |  |
| "Significant" | 3.5x-4.5x | 13\%-23\% |  |
|  |  |  |  |
| SCENARIO | $\begin{gathered} \text { Debt / } \\ \text { EBITDA } \end{gathered}$ | $\begin{gathered} \hline \text { FFO/ } \\ \text { DEBT } \end{gathered}$ | Implied Risk Rating |
| Gorman as Filed (9.20\% ROE and 51.80\% Equity Ratio) | 2.58x | 26.15\% | Intermediate |
| 9.90\% ROE and 51.80\% Equity Ratio | 2.50x | 26.93\% | Intermediate |
| 6.83\% ROE and 51.80\% Equity Ratio | 2.97x | 23.00\% | Intermediate |
|  |  |  |  |
| Company current Financial Risk rating = "Intermediate" |  |  |  |

Mr. Gorman concludes that his 9.20 percent recommendation produces pro forma ratios within S\&P's "Intermediate" guideline and therefore supports Ameren Missouri's current "Intermediate" ranking. ${ }^{136}$ Again, Mr. Gorman's conclusions are questionable given that his analysis suggests an ROE of 6.83 percent would produce coverage ratios that support the Company’s current "Intermediate" range. I do not believe there is any question that 6.83 percent is an unrealistic estimate of the Company's Cost of Equity, even if it produces pro forma credit metrics in the "Intermediate" range. As shown in Table 5 (above), the Company's requested 9.90 percent ROE and 51.80 percent equity ratio also produces coverage ratios that fall within

[^55]the "Intermediate" range, similar to Mr. Gorman’s recommended ROE.
In my view, the observation that Mr. Gorman's 9.20 percent ROE produces pro forma ratios that fall within the "Intermediate" range does not lead to the conclusion that his recommendation would support the Company's financial integrity. As noted earlier, there are factors well beyond pro forma coverage ratios that weigh in rating determinations.

Mr. Gorman's analysis also assumes that the Company actually will be able to earn its authorized return, and that its Funds From Operations will not be diluted by regulatory lag, additional capital spending, or any of the other factors that may dilute earnings and cash flow.

Lastly, as Mr. Gorman recognizes, credit rating agencies consider a number of factors beyond coverage ratios. For example, Moody's considers the regulatory structure to be so important that 50.00 percent of the factors that weigh in its ratings determination are related to the nature of regulation. ${ }^{137}$ Among the factors considered by Moody's in assessing the regulatory framework are the predictability and consistency of regulatory actions:

As the revenues set by the regulator are a primary component of a utility's cash flow, the utility's ability to obtain predictable and supportive treatment within its regulatory framework is one of the most significant factors in assessing a utility's credit quality. The regulatory framework generally provides more certainty around a utility's cash flow and typically allows the company to operate with significantly less cushion in its cash flow metrics than comparably rated companies in other industrial sectors.

In situations where the regulatory framework is less supportive, or is more contentious, a utility's credit quality can deteriorate rapidly. ${ }^{138}$

As shown in Chart 2, Mr. Gorman's ROE recommendation is far below the national average return for vertically integrated electric utilities. This introduces an element of regulatory

[^56]risk that could put pressure on Ameren Missouri's credit profile, potentially increasing its cost of capital. Because Mr. Gorman’s analysis is overly simplistic, relying on its results may well lead to incorrect conclusions and therefore those results should not be relied upon.

## G. Recommended ROE

Q. Please summarize the adjustments you made to Mr. Gorman's CAPM and

## Risk Premium analyses.

A. I updated Mr. Gorman's ROE based on the average of his highest MRP and my lowest MRP, as well as based on the average of the MRPs in my updated CAPM analysis. Based on those results his CAPM ranges from 9.44 percent to 10.37 percent.

Mr. Gorman gives 25.00 percent weight in calculating the Equity Risk Premium component of his Risk Premium analysis to Equity Risk Premia, which result in estimates of the Company's ROE far below any reasonable measure and below other estimates of the ROE that Mr. Gorman excludes because they are unreasonable. As such, I removed those estimates from Mr. Gorman's analysis. Doing so results in a range of Risk Premium estimates of 9.96 percent to 10.15 percent. In addition, I calculated Mr. Gorman's Risk Premium analysis based on the inverse relationship between the Equity Risk Premium and interest rates. That adjustment suggests a range of results from 9.65 percent to 9.88 percent.

## Q. How would those changes affect Mr. Gorman's recommended ROE?

A. Each of those reasonable adjustments should have the effect of increasing Mr. Gorman's recommendation. As discussed throughout my Direct and Rebuttal Testimonies, I also believe the DCF model should be given less weight under current market conditions. Taking each of those models and factors into account, his recommendation would likely be at approximately the low end of my recommended range (i.e., 9.75 percent).

## IV. CONCLUSIONS AND RECOMMENDATION

## Q. What is your conclusion regarding the Company's Cost of Equity?

A. Based on the analyses discussed throughout my Rebuttal Testimony, I continue to conclude that the reasonable range of ROE estimates is from 9.75 percent to 10.50 percent for the Company's Cost of Equity. The results of the updated DCF, CAPM, and Bond Yield Plus Risk Premium analyses, along with my analyses of capital market data, and authorized returns in other regulatory jurisdictions support the reasonableness of my range of ROE estimates and my recommendation.

## Q. Does this conclude your Rebuttal Testimony?

A. Yes, it does.

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI 

In the Matter of Union Electric Company ) d/b/a Ameren Missouri's Tariffs to )

File No. ER-2016-0179
Increase Its Revenues for Electric Service. )

## AFFIDAVIT OF ROBERT B. HEVERT

## COMMONWEALTH OF MASSACHUSETTS )

## COUNTY OF WORCESTER

Robert B. Hevert, being first duly sworn on his oath, states:

1. My name is Robert B. Hevert and my office is located in Westborough, Massachusetts and I am a Partner at ScottMadden.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of Union Electric Company d/b/a Ameren Missouri consisting of
$\qquad$ pages and Schedules) RBH R1 thru R18 , , all of which have been prepared in written form for introduction into evidence in the above-referenced docket.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.


Subscribed and sworn to before me this


My commission expires:

RRA is an offering of S\&P Global Market Intelligence

## MAJOR RATE CASE DECISIONS - JANUARY-DECEMBER 2016

The average ROE authorized electric utilities was $9.77 \%$ in rate cases decided in 2016, compared to $9.85 \%$ in 2015. There were 42 electric ROE determinations in 2016, versus 30 in 2015. This data includes several limited issue rider cases; excluding these cases from the data, the average authorized ROE was $9.6 \%$ in rate cases decided in 2016, the same as in 2015. RRA notes that this differential in electric authorized ROEs is largely driven by Virginia statutes that authorize the State Corporation Commission to approve ROE premiums of up to 200 basis points for certain generation projects (see the Virginia Commission Profile). The average ROE authorized gas utilities was $9.5 \%$ in 2016 versus $9.6 \%$ in 2015 . There were 24 gas cases that included an ROE determination in 2016, versus 16 in 2015.

Graph 1: Average authorized ROEs - electric and gas rate decisions


So urce: Regulatory Research Associates, an offering of S\&P Global M arket Intelligence
As shown in Graph 2 below, after reaching a low in the early-2000s, the number of rate case decisions for energy companies has generally increased over the last several years, peaking in 2010 at more than 125 cases.

Graph 2: Volume of electric and gas rate case decisions


Since 2010, the number of rate cases has moderated somewhat but has been 90 or more in the last five calendar years. There were 111 electric and gas rate cases resolved in 2016, 92 in 2015, 99 in both 2014 and 2013, and 110 in 2012, and this level of rate case activity remains robust compared to the late 1990s/early 2000 s. Increased costs associated with environmental compliance, including possible $\mathrm{CO}_{2}$ reduction mandates, generation and delivery infrastructure upgrades and expansion, renewable generation mandates and employee benefits argue for the continuation of an active rate case agenda over the next few years. In addition, if the Federal Reserve continues its policy initiated in December 2015 to gradually raise the federal funds rate, utilities eventually would face higher capital costs and would need to initiate rate cases to reflect the higher capital costs in rates. However, the magnitude and pace of any additional Federal Reserve action to raise the federal funds rate is quite uncertain.

Included in tables on pages 6 and 7 of this report are comparisons, since 2006, of average authorized ROEs by settled versus fully litigated cases, general rate cases versus limited issues rider proceedings and vertically integrated cases versus delivery only cases. For both electric and gas cases, no pattern exists in average annual authorized ROEs in cases that were settled versus those that were fully litigated. In some years, the average authorized ROE was higher for fully litigated cases, in others it was higher for settled cases, and in a few years the authorized ROE was similar for fully litigated versus settled cases. Regarding electric cases that involve limited issue riders, over the last several years the annual average authorized ROEs in these cases was typically at least 100 basis points higher than in general rate cases, driven by the ROE premiums authorized in Virginia. Limited issue rider cases in which an ROE is determined have had extremely limited use in the gas industry. Comparing electric vertically integrated cases versus delivery only proceedings, RRA finds that the annual average authorized ROEs in vertically integrated cases are from roughly 40 to 70 basis points higher than in delivery only cases, arguably reflecting the increased risk associated with generation assets.

Graph 3: Average authorized electric ROEs


We note that this report utilizes the simple mean for the return averages. In addition, the average equity returns indicated in this report reflect the cases decided in the specified time periods and are not necessarily representative of the returns actually earned by utilities industry wide.

As a result of electric industry restructuring, certain states unbundled electric rates and implemented retail competition for generation. Commissions in those states now have jurisdiction only over the revenue requirement and return parameters for delivery operations, which we footnote in our chronology beginning on page 8 , thus complicating historical data comparability. We note that from 2008 through 2015, interest rates declined significantly, and average authorized ROEs have declined modestly. We also note the increased utilization of limited issue rider proceedings that allow utilities to recover certain costs outside of a general rate case and typically incorporate previously-determined return parameters.

The table on page 4 shows the average ROE authorized in major electric and gas rate decisions annually since 1990, and by quarter since 2013, followed by the number of observations in each period. The tables on page 5 indicate the composite electric and gas industry data for all major cases summarized annually since 2002 and by quarter for the past eight quarters. The individual electric and gas cases decided in 2016 are listed on pages 8-13, with the decision date shown first, followed by the company name, the abbreviation for the state
issuing the decision, the authorized rate of return, or ROR, ROE, and percentage of common equity in the adopted capital structure. Next we indicate the month and year in which the adopted test year ended, whether the commission utilized an average or a year-end rate base, and the amount of the permanent rate change authorized. The dollar amounts represent the permanent rate change ordered at the time decisions were rendered. Fuel adjustment clause rate changes are not reflected in this study.

The table below tracks the average equity return authorized for all electric and gas rate cases combined, by year, for the last 27 years. As the table indicates, since 1990 authorized ROEs have generally trended downward, reflecting the significant decline in interest rates and capital costs that has occurred over this time frame. The combined average equity returns authorized for electric and gas utilities in each of the years 1990 through 2016, and the number of observations for each year are as follows:

## Composite Electric and Gas Average Annual Authorized ROEs: 1990 - 2016

$\left.\begin{array}{cccccc} \\ \text { Year } & \begin{array}{c}\text { Average } \\ \text { ROE (\%) }\end{array} & \text { Observations } & \text { Average } \\ \text { ROE (\%) }\end{array}\right]$

Source: Regulatory Research Associates, an offering of S\&P Global Market Intelligence

Please Note: Historical data provided in this report may not match data provided on RRA's website due to certain differences in presentation, including the treatment of cases that were withdrawn or dismissed.

## Dennis Sperduto

[^57]| Year | Period | Electric Utilities |  | Gas Utilities |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ROE \% | (\# Cases) | ROE \% | (\# Cases) |
| 1990 | Full Year | 12.70 | (44) | 12.67 | (31) |
| 1991 | Full Year | 12.55 | (45) | 12.46 | (35) |
| 1992 | Full Year | 12.09 | (48) | 12.01 | (29) |
| 1993 | Full Year | 11.41 | (32) | 11.35 | (45) |
| 1994 | Full Year | 11.34 | (31) | 11.35 | (28) |
| 1995 | Full Year | 11.55 | (33) | 11.43 | (16) |
| 1996 | Full Year | 11.39 | (22) | 11.19 | (20) |
| 1997 | Full Year | 11.40 | (11) | 11.29 | (13) |
| 1998 | Full Year | 11.66 | (10) | 11.51 | (10) |
| 1999 | Full Year | 10.77 | (20) | 10.66 | (9) |
| 2000 | Full Year | 11.43 | (12) | 11.39 | (12) |
| 2001 | Full Year | 11.09 | (18) | 10.95 | (7) |
| 2002 | Full Year | 11.16 | (22) | 11.03 | (21) |
| 2003 | Full Year | 10.97 | (22) | 10.99 | (25) |
| 2004 | Full Year | 10.75 | (19) | 10.59 | (20) |
| 2005 | Full Year | 10.54 | (29) | 10.46 | (26) |
| 2006 | Full Year | 10.32 | (26) | 10.40 | (15) |
| 2007 | Full Year | 10.30 | (38) | 10.22 | (35) |
| 2008 | Full Year | 10.41 | (37) | 10.39 | (32) |
| 2009 | Full Year | 10.52 | (40) | 10.22 | (30) |
| 2010 | Full Year | 10.37 | (61) | 10.15 | (39) |
| 2011 | Full Year | 10.29 | (42) | 9.92 | (16) |
| 2012 | Full Year | 10.17 | (58) | 9.94 | (35) |
| 2013 | 1st Quarter | 10.28 | (14) | 9.57 | (3) |
|  | 2nd Quarter | 9.84 | (7) | 9.47 | (6) |
|  | 3rd Quarter | 10.06 | (7) | 9.60 | (1) |
|  | 4th Quarter | 9.91 | (21) | 9.83 | (11) |
|  | Full Year | 10.03 | (49) | 9.68 | (21) |
| 2014 | 1st Quarter | 10.23 | (8) | 9.54 | (6) |
|  | 2nd Quarter | 9.83 | (5) | 9.84 | (8) |
|  | 3rd Quarter | 9.87 | (12) | 9.45 | (6) |
|  | 4th Quarter | 9.78 | (13) | 10.28 | (6) |
|  | Full Year | 9.91 | (38) | 9.78 | (26) |
| 2015 | 1st Quarter | 10.37 | (9) | 9.47 | (3) |
|  | 2nd Quarter | 9.73 | (7) | 9.43 | (3) |
|  | 3rd Quarter | 9.40 | (2) | 9.75 | (1) |
|  | 4th Quarter | 9.62 | (12) | 9.68 | (9) |
|  | Full Year | 9.85 | (30) | 9.60 | (16) |
|  | 1st Quarter | 10.29 | (9) | 9.48 | (6) |
|  | 2nd Quarter | 9.60 | (7) | 9.42 | (6) |
|  | 3rd Quarter | 9.76 | (8) | 9.47 | (4) |
|  | 4th Quarter | 9.57 | (18) | 9.60 | (8) |
| 2016 | Full Year | 9.77 | (42) | 9.50 | (24) |

Source: Regulatory Research Associates, an offering of S\&P Global Market Intelligence


Gas Utilities--Summary Table

|  | Period | ROR \% | (\# Cases) | ROE $\%$ | (\# Cases) | Cap. Struc. | (\# Cases) | \$ Mil. | (\# Cases) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 2002 | Full Year | 8.80 | $(20)$ | 11.03 | $(21)$ | 48.29 | $(18)$ | 303.6 | $(26)$ |
| 2003 | Full Year | 8.75 | $(22)$ | 10.99 | $(25)$ | 49.93 | $(22)$ | 260.1 | $(30)$ |
| 2004 | Full Year | 8.34 | $(21)$ | 10.59 | $(20)$ | 45.90 | $(20)$ | 303.5 | $(31)$ |
| 2005 | Full Year | 8.25 | $(29)$ | 10.46 | $(26)$ | 48.66 | $(24)$ | 458.4 | $(34)$ |
| 2006 | Full Year | 8.44 | $(17)$ | 10.40 | $(15)$ | 47.24 | $(16)$ | 392.5 | $(23)$ |
| 2007 | Full Year | 8.11 | $(31)$ | 10.22 | $(35)$ | 48.47 | $(28)$ | 645.3 | $(43)$ |
| 2008 | Full Year | 8.49 | $(33)$ | 10.39 | $(32)$ | 50.35 | $(32)$ | 700.0 | $(40)$ |
| 2009 | Full Year | 8.15 | $(29)$ | 10.22 | $(30)$ | 48.49 | $(29)$ | 438.6 | $(36)$ |
| 2010 | Full Year | 7.99 | $(40)$ | 10.15 | $(39)$ | 48.70 | $(40)$ | 776.5 | $(50)$ |
| 2011 | Full Year | 8.09 | $(18)$ | 9.92 | $(16)$ | 52.49 | $(14)$ | 367.0 | $(31)$ |
| 2012 | Full Year | 7.98 | $(30)$ | 9.94 | $(35)$ | 51.13 | $(32)$ | 264.0 | $(41)$ |
| 2013 | Full Year | 7.39 | $(20)$ | 9.68 | $(21)$ | 50.60 | $(20)$ | 494.9 | $(38)$ |
| 2014 | Full Year | 7.65 | $(27)$ | 9.78 | $(26)$ | 51.11 | $(28)$ | 529.2 | $(48)$ |
|  |  |  |  |  |  |  |  | $(2)$ | 168.9 |
|  | 1st Quarter | 6.41 | $(2)$ | 9.47 | $(3)$ | 50.41 | $(9)$ |  |  |
|  | 2nd Quarter | 7.29 | $(3)$ | 9.43 | $(3)$ | 50.71 | $(3)$ | 34.9 | $(8)$ |
|  | 3rd Quarter | 7.35 | $(1)$ | 9.75 | $(1)$ | 42.01 | $(1)$ | 103.9 | $(8)$ |
|  | 4th Quarter | 7.54 | $(10)$ | 9.68 | $(9)$ | 50.40 | $(10)$ | 186.5 | $(15)$ |
| 2015 | Full Year | 7.34 | $(16)$ | 9.60 | $(16)$ | 49.93 | $(16)$ | 494.1 | $(40)$ |
|  |  |  |  |  |  |  |  |  |  |
|  | 1st Quarter | 7.12 | $(6)$ | 9.48 | $(6)$ | 50.83 | $(6)$ | 120.2 | $(11)$ |
|  | 2nd Quarter | 7.38 | $(6)$ | 9.42 | $(6)$ | 50.01 | $(6)$ | 276.3 | $(16)$ |
|  | 3rd Quarter | 6.59 | $(5)$ | 9.47 | $(4)$ | 48.44 | $(4)$ | 106.3 | $(8)$ |
|  | 4th Quarter | 6.71 | $(7)$ | 9.60 | $(8)$ | 48.74 | $(7)$ | 733.1 | $(19)$ |
| 2016 | Full Year | 6.95 | $(24)$ | 9.50 | $(24)$ | 49.56 | $(23)$ | $1,235.9$ | $(54)$ |

Source: Regulatory Research Associates, an offering of S\&P Global Market Intelligence

## Electric Average Authorized ROEs: 2006 - 2016

| Settled versus Fully Litigated Cases |  |  |  |  |  |  |
| :---: | ---: | ---: | ---: | ---: | ---: | ---: |
| Year | All Cases |  | Settled Cases |  | Fully Litigated Cases |  |
| ROE \% | (\# Cases) | ROE \% | (\# Cases) | ROE \% | (\# Cases) |  |
| 2006 | 10.32 | $(26)$ | 10.26 | $(11)$ | 10.37 | $(15)$ |
| 2007 | 10.30 | $(38)$ | 10.42 | $(14)$ | 10.23 | $(24)$ |
| 2008 | 10.41 | $(37)$ | 10.43 | $(17)$ | 10.39 | $(20)$ |
| 2009 | 10.52 | $(40)$ | 10.64 | $(16)$ | 10.45 | $(24)$ |
| 2010 | 10.37 | $(61)$ | 10.39 | $(34)$ | 10.35 | $(27)$ |
| 2011 | 10.29 | $(42)$ | 10.12 | $(16)$ | 10.39 | $(26)$ |
| 2012 | 10.17 | $(58)$ | 10.06 | $(29)$ | 10.28 | $(29)$ |
| 2013 | 10.03 | $(49)$ | 10.12 | $(32)$ | 9.85 | $(17)$ |
| 2014 | 9.91 | $(38)$ | 9.73 | $(17)$ | 10.05 | $(21)$ |
| 2015 | 9.85 | $(30)$ | 10.07 | $(14)$ | 9.66 | $(16)$ |
| 2016 | 9.77 | $(42)$ | 9.80 | $(17)$ | 9.74 | $(25)$ |

## General Rate Cases versus Limited Issue Riders

|  | All Cases |  | General Rate Cases <br> Year |  | ROE \% | \# Cases) |
| ---: | ---: | ---: | ---: | ---: | ---: | ---: |


| Year | Vertic | y Integr |  | $s$ Deliv <br> ically <br> ted Cases | ses Delivery | Only Cases |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | ROE \% | (\# Cases) | ROE \% | (\# Cases) | ROE \% | (\# Cases) |
| 2006 | 10.32 | (26) | 10.63 | (15) | 9.91 | (10) |
| 2007 | 10.30 | (38) | 10.50 | (26) | 9.86 | (11) |
| 2008 | 10.41 | (37) | 10.48 | (26) | 10.04 | (9) |
| 2009 | 10.52 | (40) | 10.66 | (28) | 10.15 | (10) |
| 2010 | 10.37 | (61) | 10.42 | (41) | 9.98 | (17) |
| 2011 | 10.29 | (42) | 10.33 | (28) | 9.85 | (12) |
| 2012 | 10.17 | (58) | 10.10 | (39) | 9.73 | (13) |
| 2013 | 10.03 | (49) | 9.95 | (31) | 9.41 | (11) |
| 2014 | 9.91 | (38) | 9.94 | (19) | 9.50 | (14) |
| 2015 | 9.85 | (30) | 9.75 | (17) | 9.23 | (7) |
| 2016 | 9.77 | (42) | 9.77 | (20) | 9.31 | (12) |

Source: Regulatory Research Associates, an offering of S\&P Global Market Intelligence

## Gas Average Authorized ROEs: 2006 - 2016

| Year | All Cases |  | Settled Cases |  | Fully Litigated Cases |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | ROE \% | (\# Cases) | ROE \% | (\# Cases) | ROE \% | (\# Cases) |
| 2006 | 10.40 | (15) | 10.26 | (7) | 10.53 | (8) |
| 2007 | 10.22 | (35) | 10.24 | (22) | 10.20 | (13) |
| 2008 | 10.39 | (32) | 10.34 | (20) | 10.47 | (12) |
| 2009 | 10.22 | (30) | 10.43 | (13) | 10.05 | (17) |
| 2010 | 10.15 | (39) | 10.30 | (12) | 10.08 | (27) |
| 2011 | 9.92 | (16) | 10.08 | (8) | 9.76 | (8) |
| 2012 | 9.94 | (35) | 9.99 | (14) | 9.92 | (21) |
| 2013 | 9.68 | (21) | 9.80 | (9) | 9.59 | (12) |
| 2014 | 9.78 | (26) | 9.51 | (11) | 9.98 | (15) |
| 2015 | 9.60 | (16) | 9.60 | (11) | 9.58 | (5) |
| 2016 | 9.50 | (24) | 9.43 | (14) | 9.61 | (10) |

General Rate Cases versus Limited Issue Riders

|  | All Cases |  | General Rate Cases <br> (\# Cases) |  | Limited Issue Riders <br> Year |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| ROE \% Cases) | ROE \% | ROE | (\# Cases) |  |  |  |

Source: Regulatory Research Associates, an offering of S\&P Global Market Intelligence

Electric Utility Decisions

| Date | Company | State | $\begin{gathered} \text { ROR } \\ \% \end{gathered}$ | ROE \% | Common <br> Equity as \% of Capital | Test Year | Rate Base | Amt. <br> \$ Mil. Footnotes |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1/5/16 | MDU Resources Group | ND | 7.95 | 10.50 | 50.27 | 12/16 | - | 15.1 (B,LIR,1) |
| 1/6/16 | Avista Corporation | WA | 7.29 | 9.50 | 48.50 | 9/14 | - | -8.1 (B) |
| 1/28/16 | Northern India-- Public Service Co. | IN | - | - | - | - | - | 0.0 (LIR,2) |
| 2/2/16 | Kentucky Utilities Company | VA | - | - | - | 12/14 | - | 5.5 (B) |
| 2/23/16 | Entergy Arkansas | AR | 4.52 | 9.75 | 28.46 | 3/15 | - | 219.7 (B,*) |
| 2/29/16 | Virginia Electric and Power Company | VA | 7.90 | 11.60 | 49.99 | 3/17 | Average | 21.0 (LIR,3) |
| 2/29/16 | Virginia Electric and Power Company | VA | 7.40 | 10.60 | 49.99 | 3/17 | Average | -9.3 (LIR,4) |
| 2/29/16 | Virginia Electric and Power Company | VA | 7.40 | 10.60 | 49.99 | 3/17 | Average | 6.6 (LIR,5) |
| 2/29/16 | Virginia Electric and Power Company | VA | 7.40 | 10.60 | 49.99 | 3/17 | Average | -16.8 (LIR,6) |
| 3/16/16 | Indianapolis Power \& Light Company | IN | 6.51 | 9.85 | 37.33 | 6/14 | Year-end | 29.6 (*) |
| 3/25/16 | MDU Resources Group | MT | - | - | - | 12/14 | - | 7.4 (B,Z) |
| 3/29/16 | Virginia Electric and Power Company | VA | 6.90 | 9.60 | 49.99 | 3/17 | Average | 40.4 (LIR,7) |
| 2016 | 1ST QUARTER: AVERAGES/TOTAL |  |  | 10.29 |  |  |  |  |
|  | OBSERVATIONS |  | 9 | 9 | 9 |  |  | 12 |
| 4/29/16 | Fitchburg Gas and Electric Light Co. | MA | 8.46 | 9.80 | 52.17 | 12/14 | Year-end | 2.1 (D) |
| 6/3/16 | Baltimore Gas and Electric Company | MD | 7.28 | 9.75 | 51.90 | 11/15 | Average | 44.1 (D,R) |
| 6/8/16 | El Paso Electric Company | NM | 7.67 | 9.48 | 49.29 | 12/14 | Year-end | 1.1 |
| 6/15/16 | New York State Electric \& Gas Corp. | NY | 6.68 | 9.00 | 48.00 | 4/17 | Average | 29.6 (B,D,Z,8) |
| 6/15/16 | Rochester Gas and Electric Corp. | NY | 7.55 | 9.00 | 48.00 | 4/17 | Average | 3.0 (B,D,Z,8) |
| 6/23/16 | San Diego Gas \& Electric Co. | CA | - | - | - | 12/16 | Average | 3.0 (B,Z,9) |
| 6/30/16 | Appalachian Power Company | WV | - | - | - | - | - | 55.1 (B,LIR,10) |
| 6/30/16 | Virginia Electric and Power Company | VA | 7.40 | 10.60 | 49.99 | 8/17 | Average | -25.7 (LIR, 11) |
| 6/30/16 | Virginia Electric and Power Company | VA | 6.90 | 9.60 | 49.99 | 8/17 | Average | 5.4 (LIR,12) |
| 2016 | 2ND QUARTER: AVERAGES/TOTAL |  | 7.42 | 9.60 | 49.91 |  |  | 117.7 |
|  | OBSERVATIONS |  | 7 | 7 | 7 |  |  | 9 |
| 7/18/16 | Northern Indiana Public Service Co. | IN | 6.74 | 9.98 | 47.42 | 3/15 | Year-end | 72.5 (B,*) |
| 8/9/16 | Kingsport Power Company | TN | 6.18 | 9.85 | 40.25 | 12/17 | Average | 8.6 (B) |
| 8/10/16 | Southwestern Public Service Co. | NM | - | - | - | - | - | 23.5 (B) |
| 8/10/16 | Empire District Electric Company | MO | - | - | - | 6/15 | - | 20.4 (B) |
| 8/18/16 | El Paso Electric Company | TX | - | - | - | 3/15 | - | 40.7 (1,B) |
| 8/18/16 | UNS Electric, Inc. | AZ | 7.22 | 9.50 | 52.83 | 12/14 | Year-end | 15.1 |
| 8/22/16 | Virginia Electric and Power Company | VA | - | - | - | 8/17 | - | 21.3 (LIR, B,13) |
| 8/24/16 | Atlantic City Electric Company | NJ | 7.64 | 9.75 | 49.48 | 12/15 | Year-end | 45.0 (D,B) |

Electric Utility Decisions (continued)

| Date | Company | State | $\begin{gathered} \text { ROR } \\ \% \end{gathered}$ | ROE \% | Common Equity as \% of Capital | Test <br> Year | Rate Base | Amt. <br> \$ Mil. Footnotes |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 9/1/16 | PacifiCorp | WA | 7.30 | 9.50 | 49.10 | 6/15 | Year-end | 13.7 (Z) |
| 9/8/16 | Upper Peninsula Power Company | MI | 7.47 | 10.00 | 53.49 | 12/16 | Average | 4.6 (1,*) |
| 9/28/16 | Public Service Co. of New Mexico | NM | 7.71 | 9.58 | 49.61 | 9/16 | Average | 61.2 |
| 9/28/16 | KCP\&L Greater Missouri Operations | MO | - | - | - | - | - | 3.0 (B) |
| 9/30/16 | Massachusetts Electric Company | MA | 7.58 | 9.90 | 50.70 | 6/15 | Year-end | 169.7 (D) |
| 2016 | 3RD QUARTER: AVERAGES/TOTAL |  | 7.23 | 9.76 | 49.11 |  |  | 499.3 |
|  | OBSERVATIONS |  | 8 | 8 | 8 |  |  | 13 |
| 10/6/16 | Appalachian Power Company | VA | - | 9.40 | - | - | - | - (LIR) |
| 10/19/16 | South Carolina Electric \& Gas Co. | SC | 8.24 | - | 51.35 | 6/16 | Year-end | 64.4 (LIR, 14) |
| 10/26/16 | Northern States Power Company - WI | WI | - | - | - | 12/17 |  | 24.5 (15) |
| 11/9/16 | Madison Gas and Electric Company | WI | 7.89 | 9.80 | 57.16 | 12/17 | Average | -3.3 |
| 11/10/16 | Public Service Company of Oklahoma | OK | 6.94 | 9.50 | 44.00 | 1/15 | Year-end | 14.5 |
| 11/15/16 | Potomac Electric Power Company | MD | 7.49 | 9.55 | 49.55 | 12/15 | Average | 52.5 (D) |
| 11/18/16 | Wisconsin Power and Light Company | WI | 7.91 | 10.00 | 52.20 | 12/18 | Average | 9.4 (B,Z) |
| 11/29/16 | Florida Power \& Light Company | FL | - | 10.55 | - | 12/18 | - | 811.0 (B,Z) |
| 12/1/16 | Liberty Utilities (CalPeco Electric) LLC | CA | 7.51 | 10.00 | 52.50 | 12/16 | Average | 8.3 (B) |
| 12/6/16 | Commonwealth Edison Company | IL | 6.71 | 8.64 | 45.62 | 12/15 | Year-end | 130.9 (D) |
| 12/6/16 | Ameren Illinois Company | IL | 7.28 | 8.64 | 50.00 | 12/15 | Year-end | -8.8 (D) |
| 12/6/16 | Entergy Arkansas, Inc. | AR | - | - | - | 12/17 | - | 54.4 (B) |
| 12/7/16 | Duke Energy Progress, LLC | SC | 7.21 | 10.10 | 53.00 | 12/15 | Year-end | 56.2 (B,Z) |
| 12/9/16 | Monongahela Power Company | wv | - | - | - | 6/16 | - | 25.0 (B,LIR,16) |
| 12/12/16 | Jersey Central Power \& Light Co. | NJ | 7.47 | 9.60 | 45.00 | 6/16 | Year-end | 80.0 (B,D) |
| 12/14/16 | United Illuminating Company | CT | 7.08 | 9.10 | 50.00 | 12/15 | Average | 57.4 (D,Z) |
| 12/15/16 | Avista Corporation | WA | - | - | - | - | - | 0.0 (17) |
| 12/19/16 | Black Hills Colorado Electric Utility Co. | CO | 7.43 | 9.37 | 52.39 | 12/15 | Average | 0.6 |
| 12/19/16 | Emera Maine | ME | 7.45 | 9.00 | 49.00 | 12/14 | Average | 3.0 (D,Hy) |
| 12/20/16 | Georgia Power Company | GA | - | - | - | 12/17 | - | - (LIR,W,18) |
| 12/22/16 | Sierra Pacific Power Company | NV | 6.65 | 9.60 | 48.03 | 12/15 | - | -2.9 (B) |
| 12/22/16 | Virginia Electric and Power Company | NC | 7.37 | 9.90 | 51.75 | 12/15 | Year-end | 34.7 (B,I) |
| 12/23/16 | Hawaiian Electric Company, Inc. | HI | - | - | - | - | - | 0.0 (19) |
| 12/28/16 | Avista Corporation | ID | 7.58 | 9.50 | 50.00 | 12/15 | Average | 6.3 (B) |
| 12/30/16 | Appalachian Power Company | VA | 7.30 | 10.00 | 47.22 | 12/17 | Average | 3.3 (B,LIR,20) |
| 2016 | 4TH QUARTER: AVERAGES/TOTAL |  | 7.38 | 9.57 | 49.93 |  |  | 1,421.4 |
|  | OBSERVATIONS |  | 17 | 18 | 17 |  |  | 23 |
| 2016 | FULL YEAR: AVERAGES/TOTAL |  | 7.28 | 9.77 | 48.91 |  |  | 2,349.6 |
|  | OBSERVATIONS |  | 41 | 42 | 41 |  |  | 57 |

Source: Regulatory Research Associates, an offering of S\&P Global Market Intelligence

## Gas Utility Decisions

| Date | Company | State | $\begin{gathered} \text { ROR } \\ \% \end{gathered}$ | ROE \% | Common <br> Equity as \% of Capital | Test <br> Year | Rate Base | Amt. <br> \$ Mil. Footnotes |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1/6/16 | Oklahoma Natural Gas Company | OK | 7.31 | 9.50 | 60.50 | 3/15 | Year-end | 30.0 (B) |
| 1/6/16 | Avista Corporation | WA | 7.29 | 9.50 | 48.50 | 09/14 | - | 10.8 (B) |
| 1/28/16 | SourceGas Arkansas | AR | 5.33 | 9.40 | 39.46 | 3/15 | Year-end | 8.0 (B,*) |
| 2/10/16 | Liberty Utilities (New England Nat. Gas) | MA | 7.99 | 9.60 | 50.00 | 12/14 | Year-end | 7.8 (B) |
| 2/16/16 | Public Service Company of Colorado | CO | 7.33 | 9.50 | 56.51 | 12/14 | Average | 39.2 (I,Z,R) |
| 2/25/16 | Black Hills Kansas Gas Utility Company | KS | - | - | - | 10/15 | Year-end | 0.8 (LIR,21) |
| 2/29/16 | Avista Corporation | OR | 7.46 | 9.40 | 50.00 | 12/16 | Average | 4.5 |
| 3/17/16 | Atmos Energy Corporation | KS | - | - | - | 3/15 | - | 2.2 (B) |
| 3/30/16 | Indiana Gas Company, Inc. | IN | - | - | - | 6/15 | Year-end | 7.0 (LIR,22) |
| 3/30/16 | Northern Indiana Public Service Co. | IN | - | - | - | 6/15 | Year-end | 7.6 (LIR,23) |
| 3/30/16 | Southern Indiana Gas and Electric Co. | IN | - | - | - | 6/15 | Year-end | 2.3 (LIR,22) |
| 2016 | 1ST QUARTER: AVERAGES/TOTAL |  |  |  | 50.83 |  |  | 120.2 |
|  | OBSERVATIONS |  | 6 | 6 | 6 |  |  | 11 |
| 4/21/16 | Consumers Energy Company | MI | - | - | - | 12/16 | - | 40.0 (1,B) |
| 4/29/16 | Fitchburg Gas and Electric Light Company | MA | 8.46 | 9.80 | 52.17 | 12/14 | Year-end | 1.6 |
| 5/5/16 | CenterPoint Energy Resources Corp. | MN | 7.07 | 9.49 | 50.00 | 9/16 | Average | 27.5 (I) |
| 5/11/16 | Liberty Utilities (Midstates Nat. Gas) | MO | - | - | - | 1/16 | - | 0.2 (LIR,24) |
| 5/19/16 | Delta Natural Gas Company | KY | - | - | - | 12/15 | Year-end | 1.4 (LIR) |
| 5/19/16 | Laclede Gas Company | MO | - |  | - | 2/16 | Year-end | 5.4 (LIR,25) |
| 5/19/16 | Missouri Gas Energy | мо | - |  | - | 2/16 | Year-end | 3.6 (LIR,25) |
| 6/1/16 | Maine Natural Gas | ME | 7.28 | 9.55 | 50.00 | 9/14 | Average | 2.5 (B,Z) |
| 6/3/16 | Baltimore Gas and Electric Company | MD | 7.23 | 9.65 | 51.90 | 11/15 | Average | 47.9 (R) |
| 6/15/16 | New York State Electric \& Gas Corporation | NY | 6.68 | 9.00 | 48.00 | 4/17 | Average | 13.1 (B,Z,7) |
| 6/15/16 | Rochester Gas and Electric Corp. | NY | 7.55 | 9.00 | 48.00 | 4/17 | Average | 8.8 (B,Z,7) |
| 6/22/16 | Northern Indiana Public Service Co. | IN | - | - | - | 12/15 | Year-end | 6.7 (LIR,E,26) |
| 6/23/16 | San Diego Gas \& Electric Co. | CA | - | - | - | 12/16 | Average | -1.6 (B,Z,27) |
| 6/23/16 | Southern California Gas Company | CA | - | - | - | 12/16 | Average | 106.9 (B,Z,9) |
| 6/29/16 | Indiana Gas Company, Inc. | IN | - | - | - | 12/15 | Year-end | 10.2 (LIR,28) |
| 6/29/16 | Southern Indiana Gas and Electric Co. | IN | - | - | - | 12/15 | Year-end | 2.1 (LIR,28) |
| 2016 | 2ND QUARTER: AVERAGES/TOTAL |  | 7.38 | 9.42 | 50.01 |  |  | 276.3 |
|  | OBSERVATIONS |  | 6 | 6 | 6 |  |  | 16 |


| Date | Company | Gas Utility Decisions (continued) |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |
|  |  | ROR |  |  | Equity as \% Test |  |  |  |
|  |  | State | \% | ROE \% | of Capital | Year | Rate Base | \$ Mil. Footnotes |
|  |  |  |  |  |  |  |  |  |
| 7/7/16 | Cascade Natural Gas Corporation | WA | 7.35 | - | - | - | - | 4.0 (B) |
| 7/19/16 | CenterPoint Energy Resources Corp. | OK | - | - | - | 12/15 | - | 0.0 (B,29) |
| 8/4/16 | Atmos Energy Corporation | KY | - | - | - | 5/17 | - | 0.5 (B) |
| 8/22/16 | Questar Gas Company | UT | - | - | - | - | - | - (30) |
| 9/1/16 | UGI Utilities, Inc. | PA | - | - | - | 9/17 | - | 27.0 (B) |
| 9/2/16 | CenterPoint Energy Resources Corp. | AR | 4.53 | 9.50 | 30.85 | 9/15 | Year-end | 14.2 (B,*) |
| 9/23/16 | New Jersey Natural Gas Company | NJ | 6.90 | 9.75 | 52.50 | 6/16 | Year-end | 45.0 (B) |
| 9/27/16 | Texas Gas Service Company | TX | 7.28 | 9.50 | 60.10 | 9/15 | Year-end | 8.8 |
| 9/29/16 | Minnesota Energy Resources Corp. | MN | 6.88 | 9.11 | 50.32 | 12/16 | Average | 6.8 (I,E) |
| 2016 | 3RD QUARTER: AVERAGES/TOTAL |  | 6.59 | 9.47 | 48.44 |  |  | 106.3 |
|  | OBSERVATIONS |  | 5 | 4 | 4 |  |  | 8 |
| 10/26/16 | Northern States Power Company - WI | WI | - | - | - | 12/17 | - | 4.8 (15) |
| 10/27/16 | Columbia Gas of Maryland, Inc. | MD | - | - | - | 4/16 |  | 3.7 (B) |
| 10/27/16 | Columbia Gas of Pennsylvania, Inc. | PA | - | - | - | 12/17 |  | 35.0 (B) |
| 10/28/16 | Public Service Co. of North Carolina | NC | 7.53 | 9.70 | 52.00 | 12/15 | Year-end | 19.1 (B) |
| 11/9/16 | Madison Gas and Electric Company | WI | - | 9.80 | - | 12/17 | - | 3.1 |
| 11/14/16 | Atmos Energy Corporation | KY | - | - | - | 9/17 | Year-end | 5.0 (LIR,31) |
| 11/15/16 | Texas Gas Service Company | TX | - | - | - | 12/15 | - | 6.8 (B) |
| 11/18/16 | Wisconsin Power and Light Company | WI | 7.84 | 10.00 | 52.20 | 12/18 | Average | 9.4 (B,Z) |
| 11/23/16 | Baltimore Gas and Electric Company | MD | - |  | - | 12/18 | Average | 6.1 (B,Z,LIR,32) |
| 11/29/16 | Kansas Gas Service Company | KS | - |  | - | - | - | 15.5 (B) |
| 12/1/16 | Pacific Gas and Electric Company | CA | - | - | - | 12/15 | Average | 100.0 (Tr, I, 33) |
| 12/9/16 | DTE Gas Company | MI | 5.76 | 10.10 | 38.65 | 10/17 | Average | 122.3 (I,*) |
| 12/14/16 | Columbia Gas of Maryland, Inc. | MD | 7.53 | 9.70 | 54.29 | 12/17 | Average | 1.2 (LIR,32) |
| 12/15/16 | KeySpan Gas East Corporation | NY | 6.42 | 9.00 | 48.00 | 12/17 | Average | 112.0 (B,34) |
| 12/15/16 | Brooklyn Union Gas Company | NY | 6.15 | 9.00 | 48.00 | 12/17 | Average | 272.1 (B,35) |
| 12/15/16 | Avista Corporation | WA | - | - | - | - | - | 0.0 (17) |
| 12/20/16 | Columbia Gas of Virginia, Inc. | VA | - | - | - | 12/17 | Average | 1.3 (LIR,36) |
| 12/22/16 | Columbia Gas of Kentucky, Inc. | KY | - | - | - | - | - | 18.1 (B) |
| 12/22/16 | Sierra Pacific Power Company | NV | 5.75 | 9.50 | 48.03 | 12/15 | - | -2.4 (B) |
| 2016 | 4TH QUARTER: AVERAGES/TOTAL |  | 6.71 | 9.60 | 48.74 |  |  | 733.1 |
|  | OBSERVATIONS |  | 7 | 8 | 7 |  |  | 19 |
| 2016 | FULL YEAR: AVERAGES/TOTAL |  | 6.95 | 9.50 | 49.56 |  |  | 1,235.9 |
|  | OBSERVATIONS |  | 24 | 24 | 23 |  |  | 54 |

Source: Regulatory Research Associates, an offering of S\&P Global Market Intelligence

## FOOTNOTES

A- Average
B- Order followed stipulation or settlement by the parties. Decision particulars not necessarily precedent-setting or specifically adopted by the regulatory body.
CWIP- Construction work in progress
D- Applies to electric delivery only
DCt Date certain rate base valuation
E- Estimated
F- Return on fair value rate base
Hy- Hypothetical capital structure utilized
(11) Represents rate decrease associated with the company's Rider BW proceeding, which is the mechanism through which the company recovers the investment in its Brunswick County Power Station.
(12) Represents the rate increase associated with the company's Rider US-2, which is the mechanism through which the company recovers the revenue requirement associated with three new solar generation facilities.
(13) Case involves the company's request to establish Rider $U$ for recovery of investment and costs associated with a project to underground certain distribution lines.
(14) The present case involves South Carolina Electric \& Gas' request for a cash return on incremental V.C. Summer Units 2 and 3 construction work in progress (CWIP) and incorporates the $10.5 \%$ return on equity that was authorized in September 2015 for use in the Summer CWIP-related proceedings beginning in 2016.
(15) The rate case is for the limited purpose of recovering anticipated increases in: generation and transmission fixed charges and fuel and purchased power expenses related to the interchange agreement with affiliate NSP-Minnesota; and, rate base investment.
(16) Case is a consolidated expanded net energy cost proceeding for Monongahela Power and affiliate Potomac Edison.
(17) Rate increase rejected by commission.
(18) As a result of the commission's adoption of a settlement in another proceeding, the company withrew its rate increase request in this proceeding, and no rate change was implemented.
(19) No change in base rates was sought by the company, and on $12 / 23 / 16$, the commission issued an order closing this docket.
(20) Case involves the company's G-RAC rider mechanism that addresses its investment in the Dresden Generating Plant, and establishes the revenue requirement for the rider to become effective 1/1/17.
(21) Case involves the company's gas system reliabillity surcharge, or GSRS, rider and reflects investments made from July 1, 2014 through Oct. 31, 2015.
(22) Case involves company's "compliance and system improvement adjustment" mechanism, and includes compliancerelated investments made between Jan. 1 and June 30, 2015, and certain other investments made between July 1, 2014 and June 30, 2015.
(23) Case establishes the rates to be charged to customers under the company's transmission, distribution and storage system improvement charge rate adjustment mechanism, and reflects investments made between July 1, 2014 and June 30, 2015.
(24) Case involves the company's infrastructure system replacement surcharge rider and reflects incremental investments made from 6/1/15 through 1/31/16.
(25) Case involves the company's infrastructure system replacement surcharge rider and reflects incremental investments made from 9/1/15 through 2/29/16.
(26) Case establishes the rates to be charged to customers under the company's transmission, distribution and storage system improvement charge rate adjustment mechanism, and reflects investments made between 7/1/15 and 12/31/15.
(27) Settlement adopted with modifications. Rate decrease effective retroactive to $1 / 1 / 16$; rate increases to be effective 1/1/17 and 1/1/18.
(28) Case involves company's "compliance and system improvement adjustment" mechanism, and includes compliancerelated investments made between 7/1/15 and 12/31/15.
(29) Case involves the company's performance based ratemaking plan
(30) On 8/22/16, the PSC approved the company's petition to withdraw the rate increase request, effectively closing the case. The request to withdraw the filing comported with provisions of a settlement filed in the Questar/Dominion Resources merger proceeding.
(31) Case is an annual update to the company's pipe replacement program rider.
(32) Case involves the company's strategic infrastrucure development and enhancement, or STRIDE, rider.
(33) Case involves the company's gas transmission and storage operations. The decision also authorized attrition rate increases of $\$ 246$ million for 2016, $\$ 64$ million for 2017 and $\$ 105$ million for 2018.
(34) Adopted joint proposal provides for the company to implement a $\$ 112$ million rate increase effective $1 / 1 / 17$, a $\$ 19.6$ million rate increase effective $1 / 1 / 18$, and a $\$ 27$ million rate increase effective 1/1/19.
(35) Adopted joint proposal provides for the company to implement a $\$ 272.1$ million rate increase effective 1/1/17, a $\$ 41$ million rate increase effective $1 / 1 / 18$, and a $\$ 48.9$ million rate increase effective 1/1/19.
Case involves the company's investments under the Steps to Advance Virginia's Energy Plan.

Dennis Sperduto

Constant Growth Discounted Cash Flow Model with Half Year Growth Adjustment
30 Day Average Stock Price

|  |  | [1] | [2] | [3] | [4] | [5] | [6] | [7] | [8] | [9] | [10] | [11] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Annualized Dividend | Average Stock Price | Dividend Yield | Expected Dividend Yield | Zacks Earnings Growth | First Call Earnings Growth | Value Line Earnings Growth | Average Earnings Growth | $\begin{aligned} & \text { Low } \\ & \text { ROE } \end{aligned}$ | Mean ROE | $\begin{aligned} & \text { High } \\ & \text { ROE } \\ & \hline \end{aligned}$ |
| ALLETE, Inc. | ALE | \$2.08 | \$63.35 | 3.28\% | 3.36\% | 5.50\% | 5.00\% | 4.00\% | 4.83\% | 7.35\% | 8.20\% | 8.87\% |
| Alliant Energy Corp. | LNT | \$1.18 | \$36.86 | 3.19\% | 3.28\% | 5.50\% | 6.00\% | 6.00\% | 5.83\% | 8.78\% | 9.11\% | 9.28\% |
| American Electric Power | AEP | \$2.36 | \$61.03 | 3.87\% | 3.95\% | 5.40\% | 1.90\% | 5.00\% | 4.10\% | 5.80\% | 8.05\% | 9.37\% |
| Avista Corp. | AVA | \$1.37 | \$40.77 | 3.36\% | 3.45\% | NA | 5.65\% | 5.00\% | 5.33\% | 8.44\% | 8.78\% | 9.11\% |
| Black Hills Corp. | BKH | \$1.68 | \$60.32 | 2.79\% | 2.88\% | 6.20\% | 7.40\% | 7.50\% | 7.03\% | 9.07\% | 9.92\% | 10.39\% |
| CMS Energy Corp. | CMS | \$1.24 | \$40.91 | 3.03\% | 3.13\% | 6.00\% | 7.27\% | 6.00\% | 6.42\% | 9.12\% | 9.55\% | 10.41\% |
| DTE Energy Co. | DTE | \$3.30 | \$96.18 | 3.43\% | 3.53\% | 5.80\% | 5.63\% | 6.00\% | 5.81\% | 9.16\% | 9.34\% | 9.53\% |
| IDACORP, Inc. | IDA | \$2.20 | \$78.76 | 2.79\% | 2.85\% | 4.30\% | 4.10\% | 3.00\% | 3.80\% | 5.84\% | 6.65\% | 7.15\% |
| NorthWestern Corporation | NWE | \$2.00 | \$56.58 | 3.53\% | 3.63\% | 5.00\% | 4.50\% | 6.50\% | 5.33\% | 8.11\% | 8.96\% | 10.15\% |
| OGE Energy Corp. | OGE | \$1.21 | \$32.69 | 3.70\% | 3.78\% | 5.30\% | 4.00\% | 3.00\% | 4.10\% | 6.76\% | 7.88\% | 9.10\% |
| Otter Tail Corporation | OTTR | \$1.25 | \$39.79 | 3.14\% | 3.24\% | NA | 6.00\% | 6.00\% | 6.00\% | 9.24\% | 9.24\% | 9.24\% |
| Pinnacle West Capital | PNW | \$2.62 | \$75.85 | 3.45\% | 3.53\% | 4.90\% | 4.73\% | 4.00\% | 4.54\% | 7.52\% | 8.08\% | 8.44\% |
| PNM Resources, Inc. | PNM | \$0.97 | \$32.93 | 2.95\% | 3.05\% | 5.30\% | 6.85\% | 9.00\% | 7.05\% | 8.32\% | 10.10\% | 12.08\% |
| Portland General Electric Co. | POR | \$1.28 | \$42.59 | 3.01\% | 3.10\% | 6.20\% | 6.67\% | 5.50\% | 6.12\% | 8.59\% | 9.22\% | 9.78\% |
| SCANA Corp. | SCG | \$2.30 | \$72.41 | 3.18\% | 3.26\% | 5.70\% | 6.03\% | 4.50\% | 5.41\% | 7.75\% | 8.67\% | 9.30\% |
| WEC Energy Group Inc. | WEC | \$1.98 | \$57.16 | 3.46\% | 3.57\% | 6.00\% | 6.92\% | 6.00\% | 6.31\% | 9.57\% | 9.88\% | 10.50\% |
| Xcel Energy, Inc. | XEL | \$1.36 | \$39.89 | 3.41\% | 3.50\% | 5.40\% | 5.65\% | 5.50\% | 5.52\% | 8.90\% | 9.02\% | 9.16\% |
| Proxy Group Mean |  |  |  | 3.27\% | 3.36\% | 5.50\% | 5.55\% | 5.44\% | 5.50\% | 8.14\% | 8.86\% | 9.52\% |
| Proxy Group Median |  |  |  | 3.28\% | 3.36\% | 5.50\% | 5.65\% | 5.50\% | 5.52\% | 8.44\% | 9.02\% | 9.30\% |

Notes:
[1] Source: Bloomberg Professional
[2] Source: Bloomberg Professional, equals indicated number of trading day average as of December 30, 2016
[3] Equals [1] / [2]
[4] Equals [3] $\times(1+0.5 \times[8])$
5] Source: Zacks
[6] Source: Yahoo! Finance
[7] Source: Value Line
[8] Equals Average([5], [6], [7])
9] Equals [3] $\times(1+0.5 \times$ Minimum([5], [6], [7])) + Minimum([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] $\times(1+0.5 \times$ Maximum([5], [6], [7])) + Maximum([5], [6], [7])

Constant Growth Discounted Cash Flow Model with Half Year Growth Adjustment
90 Day Average Stock Price

|  |  | [1] | [2] | [3] | [4] | [5] | [6] | [7] | [8] | [9] | [10] | [11] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Annualized Dividend | Average Stock Price | Dividend Yield | Expected Dividend Yield | Zacks Earnings Growth | First Call Earnings Growth | Value Line Earnings Growth | Average Earnings Growth | $\begin{aligned} & \text { Low } \\ & \text { ROE } \end{aligned}$ | Mean ROE | High <br> ROE |
| ALLETE, Inc. | ALE | \$2.08 | \$60.87 | 3.42\% | 3.50\% | 5.50\% | 5.00\% | 4.00\% | 4.83\% | 7.49\% | 8.33\% | 9.01\% |
| Alliant Energy Corp. | LNT | \$1.18 | \$37.42 | 3.14\% | 3.23\% | 5.50\% | 6.00\% | 6.00\% | 5.83\% | 8.73\% | 9.07\% | 9.23\% |
| American Electric Power | AEP | \$2.36 | \$62.73 | 3.76\% | 3.84\% | 5.40\% | 1.90\% | 5.00\% | 4.10\% | 5.70\% | 7.94\% | 9.26\% |
| Avista Corp. | AVA | \$1.37 | \$40.83 | 3.36\% | 3.44\% | NA | 5.65\% | 5.00\% | 5.33\% | 8.44\% | 8.77\% | 9.10\% |
| Black Hills Corp. | BKH | \$1.68 | \$59.83 | 2.81\% | 2.91\% | 6.20\% | 7.40\% | 7.50\% | 7.03\% | 9.10\% | 9.94\% | 10.41\% |
| CMS Energy Corp. | CMS | \$1.24 | \$41.38 | 3.00\% | 3.09\% | 6.00\% | 7.27\% | 6.00\% | 6.42\% | 9.09\% | 9.52\% | 10.38\% |
| DTE Energy Co. | DTE | \$3.30 | \$94.27 | 3.50\% | 3.60\% | 5.80\% | 5.63\% | 6.00\% | 5.81\% | 9.23\% | 9.41\% | 9.61\% |
| IDACORP, Inc. | IDA | \$2.20 | \$77.28 | 2.85\% | 2.90\% | 4.30\% | 4.10\% | 3.00\% | 3.80\% | 5.89\% | 6.70\% | 7.21\% |
| NorthWestern Corporation | NWE | \$2.00 | \$56.88 | 3.52\% | 3.61\% | 5.00\% | 4.50\% | 6.50\% | 5.33\% | 8.10\% | 8.94\% | 10.13\% |
| OGE Energy Corp. | OGE | \$1.21 | \$31.60 | 3.83\% | 3.91\% | 5.30\% | 4.00\% | 3.00\% | 4.10\% | 6.89\% | 8.01\% | 9.23\% |
| Otter Tail Corporation | OTTR | \$1.25 | \$36.51 | 3.42\% | 3.53\% | NA | 6.00\% | 6.00\% | 6.00\% | 9.53\% | 9.53\% | 9.53\% |
| Pinnacle West Capital | PNW | \$2.62 | \$75.42 | 3.47\% | 3.55\% | 4.90\% | 4.73\% | 4.00\% | 4.54\% | 7.54\% | 8.10\% | 8.46\% |
| PNM Resources, Inc. | PNM | \$0.97 | \$32.53 | 2.98\% | 3.09\% | 5.30\% | 6.85\% | 9.00\% | 7.05\% | 8.36\% | 10.14\% | 12.12\% |
| Portland General Electric Co. | POR | \$1.28 | \$42.39 | 3.02\% | 3.11\% | 6.20\% | 6.67\% | 5.50\% | 6.12\% | 8.60\% | 9.24\% | 9.79\% |
| SCANA Corp. | SCG | \$2.30 | \$71.58 | 3.21\% | 3.30\% | 5.70\% | 6.03\% | 4.50\% | 5.41\% | 7.79\% | 8.71\% | 9.34\% |
| WEC Energy Group Inc. | WEC | \$1.98 | \$58.41 | 3.39\% | 3.50\% | 6.00\% | 6.92\% | 6.00\% | 6.31\% | 9.49\% | 9.80\% | 10.43\% |
| Xcel Energy, Inc. | XEL | \$1.36 | \$40.53 | 3.36\% | 3.45\% | 5.40\% | 5.65\% | 5.50\% | 5.52\% | 8.85\% | 8.97\% | 9.10\% |
| Proxy Group Mean |  |  |  | 3.30\% | 3.39\% | 5.50\% | 5.55\% | 5.44\% | 5.50\% | 8.16\% | 8.89\% | 9.55\% |
| Proxy Group Median |  |  |  | 3.36\% | 3.45\% | 5.50\% | 5.65\% | 5.50\% | 5.52\% | 8.44\% | 8.97\% | 9.34\% |

Notes:
[1] Source: Bloomberg Professional
[2] Source: Bloomberg Professional, equals indicated number of trading day average as of December 30, 2016
[3] Equals [1] / [2]
[4] Equals [3] $\times(1+0.5 \times[8])$
5] Source: Zacks
6] Source: Yahoo! Finance
7] Source: Value Line
[8] Equals Average([5], [6], [7])
[9] Equals [3] $\times(1+0.5 \times$ Minimum $([5],[6],[7]))+$ Minimum ([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] $\times(1+0.5 \times$ Maximum([5], [6], [7])) + Maximum([5], [6], [7])

Constant Growth Discounted Cash Flow Model with Half Year Growth Adjustment
180 Day Average Stock Price

|  |  | [1] | [2] | [3] | [4] | [5] | [6] | [7] | [8] | [9] | [10] | [11] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Annualized Dividend | Average Stock Price | Dividend Yield | Expected Dividend Yield | $\begin{aligned} & \text { Zacks } \\ & \text { Earnings } \\ & \text { Growth } \end{aligned}$ | First Call Earnings Growth | Value Line Earnings Growth | Average Earnings Growth | $\begin{aligned} & \text { Low } \\ & \text { ROE } \end{aligned}$ | Mean ROE | High <br> ROE |
| ALLETE, Inc. | ALE | \$2.08 | \$60.48 | 3.44\% | 3.52\% | 5.50\% | 5.00\% | 4.00\% | 4.83\% | 7.51\% | 8.36\% | 9.03\% |
| Alliant Energy Corp. | LNT | \$1.18 | \$37.81 | 3.11\% | 3.20\% | 5.50\% | 6.00\% | 6.00\% | 5.83\% | 8.69\% | 9.03\% | 9.20\% |
| American Electric Power | AEP | \$2.36 | \$64.74 | 3.65\% | 3.72\% | 5.40\% | 1.90\% | 5.00\% | 4.10\% | 5.58\% | 7.82\% | 9.14\% |
| Avista Corp. | AVA | \$1.37 | \$41.38 | 3.31\% | 3.40\% | NA | 5.65\% | 5.00\% | 5.33\% | 8.39\% | 8.72\% | 9.05\% |
| Black Hills Corp. | BKH | \$1.68 | \$60.39 | 2.78\% | 2.88\% | 6.20\% | 7.40\% | 7.50\% | 7.03\% | 9.07\% | 9.91\% | 10.39\% |
| CMS Energy Corp. | CMS | \$1.24 | \$42.22 | 2.94\% | 3.03\% | 6.00\% | 7.27\% | 6.00\% | 6.42\% | 9.03\% | 9.45\% | 10.31\% |
| DTE Energy Co. | DTE | \$3.30 | \$93.96 | 3.51\% | 3.61\% | 5.80\% | 5.63\% | 6.00\% | 5.81\% | 9.24\% | 9.42\% | 9.62\% |
| IDACORP, Inc. | IDA | \$2.20 | \$76.76 | 2.87\% | 2.92\% | 4.30\% | 4.10\% | 3.00\% | 3.80\% | 5.91\% | 6.72\% | 7.23\% |
| NorthWestern Corporation | NWE | \$2.00 | \$58.22 | 3.44\% | 3.53\% | 5.00\% | 4.50\% | 6.50\% | 5.33\% | 8.01\% | 8.86\% | 10.05\% |
| OGE Energy Corp. | OGE | \$1.21 | \$31.23 | 3.87\% | 3.95\% | 5.30\% | 4.00\% | 3.00\% | 4.10\% | 6.93\% | 8.05\% | 9.28\% |
| Otter Tail Corporation | OTTR | \$1.25 | \$34.23 | 3.65\% | 3.76\% | NA | 6.00\% | 6.00\% | 6.00\% | 9.76\% | 9.76\% | 9.76\% |
| Pinnacle West Capital | PNW | \$2.62 | \$75.89 | 3.45\% | 3.53\% | 4.90\% | 4.73\% | 4.00\% | 4.54\% | 7.52\% | 8.07\% | 8.44\% |
| PNM Resources, Inc. | PNM | \$0.97 | \$32.93 | 2.95\% | 3.05\% | 5.30\% | 6.85\% | 9.00\% | 7.05\% | 8.32\% | 10.10\% | 12.08\% |
| Portland General Electric Co. | POR | \$1.28 | \$42.27 | 3.03\% | 3.12\% | 6.20\% | 6.67\% | 5.50\% | 6.12\% | 8.61\% | 9.24\% | 9.80\% |
| SCANA Corp. | SCG | \$2.30 | \$71.60 | 3.21\% | 3.30\% | 5.70\% | 6.03\% | 4.50\% | 5.41\% | 7.78\% | 8.71\% | 9.34\% |
| WEC Energy Group Inc. | WEC | \$1.98 | \$60.05 | 3.30\% | 3.40\% | 6.00\% | 6.92\% | 6.00\% | 6.31\% | 9.40\% | 9.71\% | 10.33\% |
| Xcel Energy, Inc. | XEL | \$1.36 | \$41.41 | 3.28\% | 3.38\% | 5.40\% | 5.65\% | 5.50\% | 5.52\% | 8.77\% | 8.89\% | 9.03\% |
| Proxy Group Mean |  |  |  | 3.28\% | 3.37\% | 5.50\% | 5.55\% | 5.44\% | 5.50\% | 8.15\% | 8.87\% | 9.53\% |
| Proxy Group Median |  |  |  | 3.30\% | 3.40\% | 5.50\% | 5.65\% | 5.50\% | 5.52\% | 8.39\% | 8.89\% | 9.34\% |

Notes:
Notes: [1] Source: Bloomberg Professional
[2] Source: Bloomberg Professional, equals indicated number of trading day average as of December 30, 2016
3] Equals [1] / [2]
[4] Equals [3] $\times(1+0.5 \times[8])$
[5] Source: Zacks
[6] Source: Yahoo! Finance
[7] Source: Value Line
[8] Equals Average([5], [6], [7])
[9] Equals [3] $\times(1+0.5 \times$ Minimum ([5], [6], [7])) + Minimum([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] $\times(1+0.5 \times$ Maximum([5], [6], [7])) + Maximum ([5], [6], [7])









[1] Source: Bloomberg; based on 30-, 90-, and 180-day historical average as of December 30, 2016
[2] Source: Zacks
[3] Source: Yahoo! Finance
[4] Source: Value Line
[5] Equals indicated value (average, minimum, maximum) of Columns [2], [3], [4]
[6] Source: Federal Reserve, Bureau of Economic Analysis
[7] Source: Value Line
[8] Source: Value Line
[9] Source: Bloomberg Professional
[10] Equals Column [1] + Column [62]
[11] Equals result of Excel Solver function; goal: Column [10] equals \$0.00
[12] Equals Column [63] / Column [30]
[13] Equals Column [12] / (Column [6] x 100)
[14] Source: Value Line
[15] Equals Column [14] $\times(1+$ Column [5] $)$
[16] Equals Column [15] $\times(1+$ Column [5] $)$
[17] Equals Column [16] x (1 + Column [5])
[18] Equals Column [17] $\times(1+$ Column [5])
[19] Equals Column [18] $\times(1+$ Column [5])
[20] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) / $(2026-2021+1)) \times(2021-2020)))) \times$ Column [19]
[21] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) / $(2026-2021+1)) \times(2022-2020)))) \times$ Column [20]
[22] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) / $(2026-2021+1)) \times(2023-2020)))) \times$ Column [21]
[23] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) $/(2026-2021+1)) \times(2024-2020)))) \times$ Column [22]
[24] Equals (1 + (Column [5] + (((Column [6] - Column [5]) / (2026-2021 + 1)) $\times(2025-2020)))) \times$ Column [23]
[25] Equals Column [24] $\times(1+$ Column [6])
[26] Equals Column [25] $\times(1+$ Column [6])
[27] Equals Column [26] x (1 + Column [6])
[28] Equals Column [27] x (1 + Column [6])
[29] Equals Column [28] x (1 + Column [6])
[30] Equals Column [29] x (1 + Column [6])
[31] Equals Column [7]
[32] Equals Column [31] + ((Column [35] - Column [31]) / 4)
[33] Equals Column [32] + ((Column [35] - Column [31]) / 4)
[34] Equals Column [33] + ((Column [35] - Column [31]) / 4)
[35] Equals Column [8]
[36] Equals Column [35] + ((Column [41] - Column [35]) / 6)
[37] Equals Column [36] + ((Column [41] - Column [35]) / 6)
[38] Equals Column [37] + ((Column [41] - Column [35]) / 6)
[39] Equals Column [38] + ((Column [41] - Column [35]) / 6)
[40] Equals Column [39] + ((Column [41] - Column [35]) / 6)
[41] Equals Column [9]
[42] Equals Column [9]
[43] Equals Column [9]
[44] Equals Column [9]
[45] Equals Column [9]
[46] Equals Column [9]
[47] Equals Column [15] x Column [31]
[48] Equals Column [16] x Column [32]
[49] Equals Column [17] x Column [33]
[50] Equals Column [18] x Column [34]
[51] Equals Column [19] $\times$ Column [35]
[52] Equals Column [20] x Column [36]
[53] Equals Column [21] x Column [37]
[54] Equals Column [22] x Column [38]
[55] Equals Column [23] x Column [39]
[56] Equals Column [24] x Column [40]
[57] Equals Column [25] x Column [41]
[58] Equals Column [26] x Column [42]
[59] Equals Column [27] x Column [43]
[60] Equals Column [28] x Column [44]
[61] Equals Column [29] x Column [45]
[62] Equals Column [30] x Column [46]
[63] Equals (Column [62] x (1 + Column [6])) / (Column [11] - Column [6])
[64] Equals negative net present value; discount rate equals Column [11], cash flows equal Column [65] through Column [81]
[65] Equals $\$ 0.00$
[66] Equals Column [47] x (12/31/2016-12/30/2016) / 365
[67] Equals Column [47] + (0.5 x Column [5])
[68] Equals Column [49]
[69] Equals Column [50]
[70] Equals Column [51]
[71] Equals Column [52]
[72] Equals Column [53]
[73] Equals Column [54]
[74] Equals Column [55]
[75] Equals Column [56]
[76] Equals Column [57]
[77] Equals Column [58]
[78] Equals Column [59]
[79] Equals Column [60]
[80] Equals Column [61]
[81] Equals Column [62] + [63]









[1] Source: Bloomberg; based on 30-, 90-, and 180-day historical average as of December 30, 2016
[2] Source: Zacks
[3] Source: Yahoo! Finance
[4] Source: Value Line
[5] Equals indicated value (average, minimum, maximum) of Columns [2], [3], [4]
[6] Source: Federal Reserve, Bureau of Economic Analysis
[7] Source: Value Line
[8] Source: Value Line
[9] Source: Bloomberg Professional
[10] Equals Column [1] + Column [64]
[11] Equals result of Excel Solver function; goal: Column [10] equals \$0.00
[12] Source: SNL Financial
[13] Equals Column [12] / (Column [6] x 100)
[14] Source: Value Line
[15] Equals Column [14] $\times(1+$ Column [5] $)$
[16] Equals Column [15] $\times(1+$ Column [5])
[17] Equals Column [16] x (1 + Column [5])
[18] Equals Column [17] $\times(1+$ Column [5])
[19] Equals Column [18] $\times(1+$ Column [5])
[20] Equals (1 + (Column [5] + (((Column [6] - Column [5]) / (2026-2021 + 1)) $\times(2021-2020)))) \times$ Column [19]
[21] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) $/(2026-2021+1)) \times(2022-2020)))) \times$ Column [20]
[22] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) $/(2026-2021+1)) \times(2023-2020)))) \times$ Column [21]
[23] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) $/(2026-2021+1)) \times(2024-2020)))) \times$ Column [22]
[24] Equals $(1+($ Column [5] $+((($ Column [6] - Column [5]) $/(2026-2021+1)) \times(2025-2020)))) \times$ Column [23]
[25] Equals Column [24] x (1 + Column [6])
[26] Equals Column [25] $\times(1+$ Column [6])
[27] Equals Column [26] x (1 + Column [6])
[28] Equals Column [27] x (1 + Column [6])
[29] Equals Column [28] $\times(1+$ Column [6])
[30] Equals Column [29] $\times(1+$ Column [6])
[31] Equals Column [7]
[32] Equals Column [31] + ((Column [35] - Column [31]) / 4)
[33] Equals Column [32] + ((Column [35] - Column [31]) / 4)
[34] Equals Column [33] + ((Column [35] - Column [31]) / 4)
[35] Equals Column [8]
[36] Equals Column [35] + ((Column [41] - Column [35]) / 6)
[37] Equals Column [36] + ((Column [41] - Column [35]) / 6)
[38] Equals Column [37] + ((Column [41] - Column [35]) / 6)
[39] Equals Column [38] + ((Column [41] - Column [35]) / 6)
[40] Equals Column [39] + ((Column [41] - Column [35]) / 6)
[41] Equals Column [9]
[42] Equals Column [9]
[43] Equals Column [9]
44] Equals Column [9]
[45] Equals Column [9]
[46] Equals Column [9]
[47] Equals Column [15] x Column [31]
[48] Equals Column [16] x Column [32]
[49] Equals Column [17] $\times$ Column [33]
[50] Equals Column [18] x Column [34]
[51] Equals Column [19] x Column [35]
[52] Equals Column [20] x Column [36]
[53] Equals Column [21] x Column [37]
[54] Equals Column [22] x Column [38]
[55] Equals Column [23] x Column [39]
[56] Equals Column [24] x Column [40]
[57] Equals Column [25] x Column [41]
[58] Equals Column [26] $\times$ Column [42]
[59] Equals Column [27] x Column [43]
[60] Equals Column [28] x Column [44]
[61] Equals Column [29] $\times$ Column [45]
[62] Equals Column [30] x Column [46]
[63] Equals Column [12] x Column [30]
[64] Equals negative net present value; discount rate equals Column [11], cash flows equal Column [65] through Column [81]
[65] Equals \$0.00
[66] Equals Column [47] $\times(12 / 31 / 2016-12 / 30 / 2016) / 365$
[67] Equals Column [47] + (0.5 x Column [5])
[68] Equals Column [49]
[69] Equals Column [50]
[70] Equals Column [51]
[71] Equals Column [52]
[72] Equals Column [53]
[73] Equals Column [54]
[74] Equals Column [55]
[75] Equals Column [56]
[76] Equals Column [57]
[77] Equals Column [58]
[78] Equals Column [59]
[79] Equals Column [60]
[80] Equals Column [61]
[81] Equals Column [62] + [63]


| Ex-Ante Market Risk Premium Market DCF Method Based - Bloomberg |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | ${ }_{\text {[1] }}^{\text {S\& } 500}$ | [2] | [3] |  |  | [9] |
|  |  | S\&P 500 Est. Required Market Return | Current 30-Year Treasury (30-day average) | Implied Market Risk Premium |  |  |  |
|  |  | 12.60\% | 3.08\% | 9.52\% |  |  |  |
|  |  | [4] | [5] | [6] | [7] | [8] |  |
| Company | Ticker | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| CHESAPEAKE ENERGY CORP | CHK | 6,371.46 | 0.03\% | 0.00\% | -0.49\% | -0.49\% | -0.0002\% |
| C.H. ROBINSON WORLDWIDE INC | CHRW | 10,361.57 | 0.05\% | 2.38\% | 9.52\% | 12.01\% | 0.0061\% |
| CHARTER COMMUNICATIONS INC-A | CHTR | 89,184.63 | 0.43\% | 0.00\% | 27.89\% | 27.89\% | 0.1212\% |
| CIGNA CORP | Cl | 34,646.88 | 0.17\% | 0.02\% | 10.99\% | 11.01\% | 0.0186\% |
| CINCINNATI FINANCIAL CORP | CINF | 12,397.33 | N/A | 2.55\% | N/A | N/A | N/A |
| COLGATE-PALMOLIVE CO | CL | 58,272.52 | 0.28\% | 2.38\% | 9.61\% | 12.11\% | 0.0344\% |
| CLOROX COMPANY | CLX | 15,543.23 | 0.08\% | 2.67\% | 7.46\% | 10.23\% | 0.0078\% |
| COMERICA INC | CMA | 11,874.09 | 0.06\% | 1.29\% | -3.70\% | -2.43\% | -0.0014\% |
| COMCAST CORP-CLASS A | CMCSA | 165,344.72 | 0.81\% | 1.60\% | 11.75\% | 13.44\% | 0.1083\% |
| CME GROUP INC | CME | 38,733.44 | 0.19\% | 4.69\% | 10.77\% | 15.71\% | 0.0297\% |
| CHIPOTLE MEXICAN GRILL INC | CMG | 10,971.73 | 0.05\% | 0.00\% | 14.48\% | 14.48\% | 0.0077\% |
| CUMMINS INC | CMI | 23,344.81 | 0.11\% | 2.88\% | 4.73\% | 7.67\% | 0.0087\% |
| CMS ENERGY CORP | CMS | 11,568.59 | 0.06\% | 2.97\% | 6.28\% | 9.34\% | 0.0053\% |
| CENTENE CORP | CNC | 9,749.39 | 0.05\% | 0.00\% | 15.16\% | 15.16\% | 0.0072\% |
| CONDUENT INC | CNDT | \#VALUE! | \#VALUE! | 0.00\% | N/A | N/A | N/A |
| CENTERPOINT ENERGY INC | CNP | 10,577.56 | 0.05\% | 4.20\% | 5.25\% | 9.56\% | 0.0049\% |
| CAPITAL ONE FINANCIAL CORP | COF | 42,852.48 | 0.21\% | 1.80\% | 4.31\% | 6.15\% | 0.0128\% |
| CABOT OIL \& GAS CORP | COG | 10,410.05 | 0.05\% | 0.36\% | 37.99\% | 38.41\% | 0.0195\% |
| COACH INC | COH | 10,028.66 | 0.05\% | 3.79\% | 9.73\% | 13.70\% | 0.0067\% |
| ROCKWELL COLLINS INC | COL | 12,166.41 | 0.06\% | 1.49\% | 9.03\% | 10.59\% | 0.0063\% |
| COOPER COS INC/THE | COO | 8,548.39 | 0.04\% | 0.05\% | 12.35\% | 12.40\% | 0.0052\% |
| CONOCOPHILLIPS | COP | 63,140.84 | 0.31\% | 1.96\% | 6.67\% | 8.70\% | 0.0268\% |
| COSTCO WHOLESALE CORP | COST | 69,931.46 | 0.34\% | 1.15\% | 10.27\% | 11.47\% | 0.0391\% |
| COTY INC-CL A | COTY | 14,001.02 | 0.07\% | 2.68\% | 0.41\% | 3.09\% | 0.0021\% |
| CAMPBELL SOUP CO | CPB | 18,702.53 | 0.09\% | 2.32\% | 5.33\% | 7.71\% | 0.0070\% |
| SALESFORCE.COM INC | CRM | 49,068.58 | 0.24\% | 0.00\% | 26.36\% | 26.36\% | 0.0630\% |
| CISCO SYSTEMS INC | CSCO | 152,274.39 | 0.74\% | 3.56\% | 8.01\% | 11.72\% | 0.0870\% |
| CSRA INC | CSRA | 5,241.08 | 0.03\% | 0.00\% | 10.00\% | 10.00\% | 0.0026\% |
| CSX CORP | CSX | 33,822.83 | 0.16\% | 2.00\% | 7.36\% | 9.43\% | 0.0155\% |
| CINTAS CORP | CTAS | 12,236.55 | 0.06\% | 1.14\% | 11.44\% | 12.65\% | 0.0075\% |
| CENTURYLINK INC | CTL | 13,672.72 | 0.07\% | 8.64\% | -4.24\% | 4.22\% | 0.0028\% |
| COGNIZANT TECH SOLUTIONS-A | CTSH | 34,121.07 | 0.17\% | 0.00\% | 12.13\% | 12.13\% | 0.0202\% |
| CITRIX SYSTEMS INC | CTXS | 14,047.86 | 0.07\% | 0.00\% | 16.18\% | 16.18\% | 0.0111\% |
| CVS HEALTH CORP | cVs | 85,464.44 | 0.42\% | 2.05\% | 11.90\% | 14.07\% | 0.0586\% |
| CHEVRON CORP | cVx | 224,267.00 | 1.09\% | 3.61\% | -1.10\% | 2.50\% | 0.0273\% |
| CONCHO RESOURCES INC | cxo | 19,762.14 | 0.10\% | 0.00\% | 22.50\% | 22.50\% | 0.0217\% |
| DOMINION RESOURCES INC/VA | D | 47,827.33 | 0.23\% | 3.67\% | 6.14\% | 9.92\% | 0.0231\% |
| DELTA AIR LINES INC | DAL | 36,539.41 | 0.18\% | 1.35\% | 12.19\% | 13.63\% | 0.0243\% |
| DU PONT (E.I.) DE NEMOURS | DD | 63,966.18 | 0.31\% | 2.07\% | 7.53\% | 9.67\% | 0.0301\% |
| DEERE \& CO | DE | 32,980.10 | 0.16\% | 2.49\% | 8.68\% | 11.28\% | 0.0181\% |
| DISCOVER FINANCIAL SERVICES | DFS | 28,574.18 | 0.14\% | 1.61\% | 6.25\% | 7.91\% | 0.0110\% |
| DOLLAR GENERAL CORP | DG | 20,402.12 | 0.10\% | 1.35\% | 11.06\% | 12.48\% | 0.0124\% |
| QUEST DIAGNOSTICS INC | DGX | 12,879.65 | 0.06\% | 1.73\% | 8.63\% | 10.43\% | 0.0065\% |
| DR HORTON INC | DHI | 10,286.10 | 0.05\% | 1.38\% | 10.33\% | 11.78\% | 0.0059\% |
| DANAHER CORP | DHR | 54,167.19 | 0.26\% | 0.77\% | 8.78\% | 9.58\% | 0.0253\% |
| WALT DISNEY CO/THE | DIS | 169,331.45 | 0.83\% | 1.47\% | 8.46\% | 10.00\% | 0.0825\% |
| DISCOVERY COMMUNICATIONS-A | DISCA | 16,804.70 | 0.08\% | 0.00\% | 17.53\% | 17.53\% | 0.0144\% |
| DELPHI AUTOMOTIVE PLC | DLPH | 18,457.72 | 0.09\% | 1.71\% | 13.63\% | 15.45\% | 0.0139\% |
| DIGITAL REALTY TRUST INC | DLR | 16,030.98 | 0.08\% | 3.55\% | 5.20\% | 8.84\% | 0.0069\% |
| DOLLAR TREE INC | DLTR | 18,201.11 | 0.09\% | 0.00\% | 16.50\% | 16.50\% | 0.0146\% |
| DUN \& BRADSTREET CORP | DNB | 4,489.45 | 0.02\% | 1.58\% | 8.00\% | 9.64\% | 0.0021\% |
| DOVER CORP | DOV | 11,874.71 | 0.06\% | 2.27\% | 10.68\% | 13.06\% | 0.0076\% |
| DOW CHEMICAL CO/THE | Dow | 70,277.08 | 0.34\% | 3.29\% | 3.53\% | 6.87\% | 0.0235\% |
| DR PEPPER SNAPPLE GROUP INC | DPS | 16,723.59 | 0.08\% | 2.31\% | 9.03\% | 11.45\% | 0.0093\% |
| DARDEN RESTAURANTS INC | DRI | 8,824.89 | 0.04\% | 3.13\% | 10.88\% | 14.17\% | 0.0061\% |
| DTE ENERGY COMPANY | DTE | 17,631.32 | 0.09\% | 3.10\% | 4.95\% | 8.12\% | 0.0070\% |
| DUKE ENERGY CORP | DUK | 53,364.79 | 0.26\% | 4.34\% | 4.05\% | 8.49\% | 0.0221\% |
| DAVITA INC | DVA | 12,791.52 | 0.06\% | 0.00\% | 8.95\% | 8.95\% | 0.0056\% |
| DEVON ENERGY CORP | DVN | 24,509.72 | 0.12\% | 0.90\% | 8.60\% | 9.54\% | 0.0114\% |
| ELECTRONIC ARTS INC | EA | 23,775.32 | 0.12\% | 0.00\% | 15.00\% | 15.00\% | 0.0174\% |
| EBAY INC | EBAY | 33,448.36 | 0.16\% | 0.00\% | 9.67\% | 9.67\% | 0.0158\% |
| ECOLAB INC | ECL | 34,356.49 | 0.17\% | 1.21\% | 12.88\% | 14.17\% | 0.0237\% |
| CONSOLIDATED EDISON INC | ED | 22,284.42 | 0.11\% | 3.66\% | 3.34\% | 7.07\% | 0.0077\% |
| EQUIFAXINC | EFX | 14,255.19 | 0.07\% | 1.11\% | 11.33\% | 12.50\% | 0.0087\% |
| EDISON INTERNATIONAL | EIX | 23,324.82 | 0.11\% | 2.73\% | 5.90\% | 8.71\% | 0.0099\% |
| ESTEE LAUDER COMPANIES-CL A | EL | 28,410.12 | 0.14\% | 1.70\% | 11.94\% | 13.74\% | 0.0190\% |
| EASTMAN CHEMICAL CO | EMN | 11,104.64 | 0.05\% | 2.45\% | 5.63\% | 8.15\% | 0.0044\% |
| EMERSON ELECTRIC CO | EMR | 36,540.32 | 0.18\% | 3.43\% | 8.68\% | 12.26\% | 0.0218\% |
| ENDO INTERNATIONAL PLC | ENDP | 3,842.40 | 0.02\% | 0.00\% | 1.92\% | 1.92\% | 0.0004\% |
| EOG RESOURCES INC | EOG | 59,628.78 | 0.29\% | 0.65\% | -9.76\% | -9.14\% | -0.0266\% |
| EQUINIX INC | EQIX | 25,655.15 | 0.13\% | 1.95\% | 19.78\% | 21.92\% | 0.0274\% |
| EQUITY RESIDENTIAL | EQR | 23,512.12 | 0.11\% | 14.82\% | 5.52\% | 20.75\% | 0.0238\% |
| EQT CORP | EQT | 10,999.50 | 0.05\% | 0.19\% | 17.50\% | 17.70\% | 0.0095\% |
| EVERSOURCE ENERGY | ES | 17,403.37 | 0.08\% | 3.25\% | 6.50\% | 9.86\% | 0.0084\% |
| EXPRESS SCRIPTS HOLDING CO | ESRX | 42,836.66 | 0.21\% | 0.00\% | 12.02\% | 12.02\% | 0.0251\% |
| ESSEX PROPERTY TRUST INC | ESS | 15,190.87 | 0.07\% | 2.74\% | 6.57\% | 9.40\% | 0.0070\% |
| E*TRADE FINANCIAL CORP | ETFC | 9,657.36 | 0.05\% | 0.00\% | 20.82\% | 20.82\% | 0.0098\% |
| EATON CORP PLC | ETN | 30,543.95 | 0.15\% | 3.36\% | 8.30\% | 11.80\% | 0.0176\% |
| ENTERGY CORP | ETR | 13,024.39 | 0.06\% | 4.74\% | -4.67\% | -0.04\% | 0.0000\% |
| ENVISION HEALTHCARE CORP | EVHC | 7,524.46 | 0.04\% | 0.00\% | 12.36\% | 12.36\% | 0.0045\% |
| EDWARDS LIFESCIENCES CORP | EW | 20,344.40 | 0.10\% | 0.00\% | 17.75\% | 17.75\% | 0.0176\% |
| EXELON CORP | EXC | 32,323.83 | 0.16\% | 3.60\% | 3.86\% | 7.53\% | 0.0119\% |
| EXPEDITORS INTL WASH INC | EXPD | 9,509.35 | 0.05\% | 1.49\% | 8.30\% | 9.85\% | 0.0046\% |
| EXPEDIA INC | EXPE | 17,079.40 | 0.08\% | 0.87\% | 17.34\% | 18.29\% | 0.0152\% |
| EXTRA SPACE STORAGE INC | EXR | 9,712.23 | 0.05\% | 3.82\% | 8.63\% | 12.62\% | 0.0060\% |
| FORD MOTOR CO | F | 49,353.54 | 0.24\% | 5.68\% | 0.65\% | 6.35\% | 0.0153\% |
| FASTENAL CO | FAST | 13,630.75 | 0.07\% | 2.54\% | 15.50\% | 18.24\% | 0.0121\% |
| FACEBOOK INC-A | FB | 339,364.74 | 1.65\% | 0.00\% | 32.93\% | 32.93\% | 0.5446\% |


| Ex-Ante Market Risk Premium Market DCF Method Based - Bloomberg |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | [1] | [2] | [3] |  |  |  |
|  |  | S\&P 500 Est. Required Market Return | Current 30-Year Treasury (30-day average) | Implied Market Risk Premium |  |  |  |
|  |  | 12.60\% | 3.08\% | 9.52\% |  |  |  |
|  |  | [4] | [5] | [6] | [7] | [8] | [9] |
| Company | Ticker | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| FORTUNE BRANDS HOME \& SECURI | FBHS | 8,334.12 | 0.04\% | 1.17\% | 15.20\% | 16.46\% | 0.0067\% |
| FREEPORT-MCMORAN INC | FCX | 18,532.58 | 0.09\% | 0.00\% | 15.75\% | 15.75\% | 0.0142\% |
| FEDEX CORP | FDX | 50,146.39 | 0.24\% | 0.85\% | 12.72\% | 13.63\% | 0.0333\% |
| FIRSTENERGY CORP | FE | 13,057.55 | 0.06\% | 4.70\% | 0.34\% | 5.04\% | 0.0032\% |
| F5 NETWORKS INC | FFIV | 9,489.11 | 0.05\% | 0.00\% | 12.22\% | 12.22\% | 0.0056\% |
| FIDELITY NATIONAL INFO SERV | FIS | 25,148.82 | 0.12\% | 1.34\% | 12.00\% | 13.42\% | 0.0165\% |
| FISERV INC | FISV | 23,199.09 | 0.11\% | 0.00\% | 12.54\% | 12.54\% | 0.0142\% |
| FIFTH THIRD BANCORP | FITB | 20,496.02 | 0.10\% | 1.95\% | 2.40\% | 4.38\% | 0.0044\% |
| FOOT LOCKER INC | FL | 9,524.98 | 0.05\% | 1.50\% | 10.03\% | 11.61\% | 0.0054\% |
| FLIR SYSTEMS INC | FLIR | 4,936.07 | 0.02\% | 1.30\% | 15.00\% | 16.39\% | 0.0039\% |
| FLUOR CORP | FLR | 7,420.64 | 0.04\% | 1.58\% | 5.59\% | 7.21\% | 0.0026\% |
| FLOWSERVE CORP | FLS | 6,385.63 | 0.03\% | 1.51\% | 7.94\% | 9.51\% | 0.0030\% |
| FMC CORP | FMC | 7,612.75 | 0.04\% | 1.16\% | 11.03\% | 12.26\% | 0.0045\% |
| TWENTY-FIRST CENTURY FOX-B | FOX | 52,860.96 | 0.26\% | 1.39\% | 12.15\% | 13.63\% | 0.0351\% |
| FEDERAL REALTY INVS TRUST | FRT | 10,223.12 | 0.05\% | 2.70\% | 5.24\% | 8.01\% | 0.0040\% |
| FIRST SOLAR INC | FSLR | 3,470.70 | 0.02\% | 0.00\% | -28.37\% | -28.37\% | -0.0048\% |
| FMC TECHNOLOGIES INC | FTI | 8,206.53 | 0.04\% | 0.00\% | -13.00\% | -13.00\% | -0.0052\% |
| FRONTIER COMMUNICATIONS CORP | FTR | 4,058.67 | 0.02\% | 12.14\% | 1.00\% | 13.20\% | 0.0026\% |
| FORTIVE CORP | FTV | 18,476.27 | 0.09\% | 0.25\% | 7.44\% | 7.70\% | 0.0069\% |
| GENERAL DYNAMICS CORP | GD | 53,205.66 | 0.26\% | 1.73\% | 8.11\% | 9.91\% | 0.0257\% |
| GENERAL ELECTRIC CO | GE | 278,749.75 | 1.36\% | 2.95\% | 10.24\% | 13.34\% | 0.1812\% |
| GENERAL GROWTH PROPERTIES | GGP | 22,082.21 | 0.11\% | 3.55\% | 6.74\% | 10.41\% | 0.0112\% |
| GILEAD SCIENCES INC | GILD | 96,543.18 | 0.47\% | 2.51\% | 0.87\% | 3.39\% | 0.0160\% |
| GENERAL MILLS INC | GIS | 35,972.30 | 0.18\% | 3.07\% | 8.22\% | 11.41\% | 0.0200\% |
| CORNING INC | GLW | 23,190.87 | 0.11\% | 2.23\% | 11.63\% | 13.99\% | 0.0158\% |
| GENERAL MOTORS CO | GM | 53,809.34 | 0.26\% | 4.31\% | 4.80\% | 9.21\% | 0.0241\% |
| ALPHABET INC-CL C | GOOG | 548,632.91 | 2.67\% | 0.00\% | 16.40\% | 16.40\% | 0.4386\% |
| GENUINE PARTS CO | GPC | 14,106.24 | 0.07\% | 2.78\% | 8.24\% | 11.13\% | 0.0077\% |
| GLOBAL PAYMENTS INC | GPN | 10,804.93 | 0.05\% | 0.06\% | 13.00\% | 13.06\% | 0.0069\% |
| GAP INC/THE | GPS | 9,134.38 | 0.04\% | 4.02\% | 6.39\% | 10.53\% | 0.0047\% |
| GARMIN LTD | GRMN | 9,271.54 | 0.05\% | 4.17\% | 5.47\% | 9.75\% | 0.0044\% |
| GOLDMAN SACHS GROUP INC | GS | 101,408.79 | 0.49\% | 1.07\% | 11.03\% | 12.16\% | 0.0601\% |
| GOODYEAR TIRE \& RUBBER CO | GT | 8,202.27 | N/A | 0.95\% | N/A | N/A | N/A |
| WW GRAINGER INC | GWW | 13,970.85 | 0.07\% | 2.06\% | 11.95\% | 14.13\% | 0.0096\% |
| halliburton Co | HAL | 48,366.10 | 0.24\% | 1.29\% | 17.56\% | 18.96\% | 0.0447\% |
| HARMAN INTERNATIONAL | HAR | 7,735.18 | 0.04\% | 1.30\% | 16.00\% | 17.40\% | 0.0066\% |
| HASBRO INC | HAS | 9,817.04 | 0.05\% | 2.59\% | 10.35\% | 13.08\% | 0.0063\% |
| HUNTINGTON BANCSHARES INC | HBAN | 14,460.15 | 0.07\% | 2.16\% | 8.24\% | 10.49\% | 0.0074\% |
| HANESBRANDS Inc | HBI | 8,286.45 | 0.04\% | 2.00\% | 16.40\% | 18.57\% | 0.0075\% |
| HCA HOLDINGS INC | HCA | 27,839.15 | 0.14\% | 0.00\% | 11.50\% | 11.50\% | 0.0156\% |
| WELLTOWER INC | HCN | 24,032.22 | 0.12\% | 5.19\% | 5.45\% | 10.78\% | 0.0126\% |
| HCP INC | HCP | 13,894.06 | 0.07\% | 6.97\% | 0.20\% | 7.18\% | 0.0049\% |
| HOME DEPOT INC | HD | 164,037.56 | 0.80\% | 2.06\% | 13.34\% | 15.53\% | 0.1242\% |
| HESS CORP | HES | 20,200.42 | 0.10\% | 1.59\% | -11.69\% | -10.19\% | -0.0100\% |
| HARTFORD FINANCIAL SVCS GRP | HIG | 18,123.69 | 0.09\% | 1.84\% | 9.67\% | 11.60\% | 0.0102\% |
| HARLEY-DAVIDSON INC | HOG | 10,450.85 | 0.05\% | 2.40\% | 11.00\% | 13.53\% | 0.0069\% |
| HOLOGIC INC | HOLX | 11,150.89 | 0.05\% | 0.00\% | 9.90\% | 9.90\% | 0.0054\% |
| HONEYWELL INTERNATIONAL INC | HON | 88,315.01 | 0.43\% | 2.11\% | 9.07\% | 11.28\% | 0.0485\% |
| HELMERICH \& PAYNE | HP | 8,562.23 | 0.04\% | 3.53\% | -11.57\% | -8.25\% | -0.0034\% |
| HEWLETT PACKARD ENTERPRIS | HPE | 38,906.78 | 0.19\% | 1.05\% | 4.86\% | 5.94\% | 0.0113\% |
| HP INC | HPQ | 25,522.07 | 0.12\% | 3.54\% | 2.50\% | 6.09\% | 0.0076\% |
| H\&R BLOCK INC | HRB | 4,753.33 | 0.02\% | 3.81\% | 11.00\% | 15.02\% | 0.0035\% |
| HORMEL FOODS CORP | HRL | 18,777.75 | 0.09\% | 1.85\% | 4.17\% | 6.06\% | 0.0055\% |
| HARRIS CORP | HRS | 12,776.89 | N/A | 2.06\% | N/A | N/A | N/A |
| HENRY SCHEIN INC | HSIC | 12,510.71 | 0.06\% | 0.00\% | 11.67\% | 11.67\% | 0.0071\% |
| HOST HOTELS \& RESORTS INC | HST | 13,953.86 | 0.07\% | 4.43\% | 6.00\% | 10.57\% | 0.0072\% |
| HERSHEY CO/THE | HSY | 22,112.18 | 0.11\% | 2.28\% | 8.74\% | 11.12\% | 0.0120\% |
| HUMANA INC | HUM | 29,493.70 | 0.14\% | 0.59\% | 12.95\% | 13.57\% | 0.0195\% |
| INTL BUSINESS MACHINES CORP | IBM | 158,773.69 | 0.77\% | 3.26\% | 5.02\% | 8.36\% | 0.0647\% |
| INTERCONTINENTAL EXCHANGE IN | ICE | 33,512.74 | 0.16\% | 1.11\% | 8.21\% | 9.37\% | 0.0153\% |
| INTL FLAVORS \& FRAGRANCES | IFF | 9,390.28 | 0.05\% | 1.96\% | 9.25\% | 11.30\% | 0.0052\% |
| ILLUMINA INC | ILMN | 19,257.12 | 0.09\% | 0.00\% | 12.74\% | 12.74\% | 0.0120\% |
| INTEL CORP | INTC | 173,873.91 | 0.85\% | 2.68\% | 9.38\% | 12.19\% | 0.1033\% |
| INTUIT INC | INTU | 29,539.99 | 0.14\% | 1.07\% | 16.45\% | 17.61\% | 0.0254\% |
| INTERNATIONAL PAPER CO | IP | 21,954.68 | 0.11\% | 3.34\% | 6.38\% | 9.82\% | 0.0105\% |
| INTERPUBLIC GROUP OF COS INC | IPG | 9,361.50 | 0.05\% | 2.53\% | 6.00\% | 8.60\% | 0.0039\% |
| INGERSOLL-RAND PLC | IR | 19,604.73 | 0.10\% | 1.74\% | 10.82\% | 12.65\% | 0.0121\% |
| IRON MOUNTAIN INC | IRM | 8,567.32 | 0.04\% | 5.94\% | 10.70\% | 16.96\% | 0.0071\% |
| INTUITIVE SURGICAL INC | ISRG | 24,749.27 | 0.12\% | 0.00\% | 14.09\% | 14.09\% | 0.0170\% |
| ILLINOIS TOOL WORKS | ITW | 43,036.69 | 0.21\% | 1.87\% | 7.97\% | 9.91\% | 0.0208\% |
| INVESCO LTD | IVZ | 12,574.72 | 0.06\% | 3.64\% | 9.75\% | 13.57\% | 0.0083\% |
| HUNT (JB) TRANSPRT SVCS INC | JBHT | 10,884.20 | 0.05\% | 0.91\% | 15.07\% | 16.04\% | 0.0085\% |
| JOHNSON CONTROLS INTERNATION | JCI | 39,389.00 | 0.19\% | 2.43\% | 8.50\% | 11.04\% | 0.0212\% |
| JACOBS ENGINEERING GROUP INC | JEC | 7,110.85 | 0.03\% | 0.30\% | 8.34\% | 8.65\% | 0.0030\% |
| JOHNSON \& JOHNSON | JNJ | 314,656.70 | 1.53\% | 2.70\% | 6.60\% | 9.39\% | 0.1439\% |
| JUNIPER NETWORKS INC | JNPR | 11,006.55 | 0.05\% | 1.40\% | 9.49\% | 10.96\% | 0.0059\% |
| JPMORGAN CHASE \& CO | JPM | 310,951.17 | 1.52\% | 2.16\% | 6.56\% | 8.79\% | 0.1332\% |
| NORDSTROM INC | JWN | 8,291.82 | 0.04\% | 3.19\% | 9.55\% | 12.89\% | 0.0052\% |
| KELLOGG CO | K | 25,773.98 | 0.13\% | 2.79\% | 5.62\% | 8.49\% | 0.0107\% |
| KEYCORP | KEY | 19,874.29 | 0.10\% | 1.79\% | 5.08\% | 6.92\% | 0.0067\% |
| KRAFT HEINZ CO/THE | KHC | 105,525.16 | 0.51\% | 2.71\% | 21.47\% | 24.47\% | 0.1259\% |
| KIMCO REALTY CORP | KIM | 10,765.91 | 0.05\% | 4.09\% | 5.69\% | 9.90\% | 0.0052\% |
| KLA-TENCOR CORP | KLAC | 12,460.17 | 0.06\% | 2.68\% | 4.50\% | 7.24\% | 0.0044\% |
| KIMBERLY-CLARK CORP | KMB | 41,073.26 | 0.20\% | 3.19\% | 7.08\% | 10.39\% | 0.0208\% |
| KINDER MORGAN INC | KMı | 47,895.38 | 0.23\% | 2.33\% | 10.55\% | 13.00\% | 0.0304\% |
| CARMAX INC | KMX | 12,358.09 | 0.06\% | 0.00\% | 12.59\% | 12.59\% | 0.0076\% |
| COCA-COLA CO/THE | KO | 179,893.54 | 0.88\% | 3.36\% | 4.67\% | 8.11\% | 0.0711\% |
| MICHAEL KORS HOLDINGS LTD | KORS | 7,041.28 | 0.03\% | 0.00\% | 7.61\% | 7.61\% | 0.0026\% |


| Ex-Ante Market Risk Premium Market DCF Method Based - Bloomberg |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | [1] | [2] | [3] |  |  |  |
|  |  | $\begin{gathered} \text { S\&P } 500 \\ \text { Est. Required } \\ \text { Market Return } \\ \hline \end{gathered}$ | Current 30-Year Treasury (30-day average) | Implied Market Risk Premium |  |  |  |
|  |  | 12.60\% | 3.08\% | 9.52\% |  |  |  |
|  |  | [4] | [5] | [6] | [7] | [8] | [9] |
| Company | Ticker | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est | DCF Result | Weighted DCF Result |
| KROGER CO | KR | 31,530.37 | 0.15\% | 1.37\% | 9.15\% | 10.59\% | 0.0163\% |
| KOHLS CORP | KSS | 8,687.76 | 0.04\% | 4.10\% | 4.90\% | 9.10\% | 0.0039\% |
| KANSAS CITY SOUTHERN | KSU | 9,068.91 | 0.04\% | 1.58\% | 11.98\% | 13.65\% | 0.0060\% |
| LOEWS CORP | L | 15,904.48 | N/A | 0.53\% | N/A | N/A | N/A |
| L BRANDS INC | LB | 18,950.30 | 0.09\% | 5.75\% | 10.08\% | 16.11\% | 0.0149\% |
| LEGGETT \& PLATT INC | LEG | 6,613.16 | N/A | 2.65\% | N/A | N/A | N/A |
| LENNAR CORP-A | LEN | 9,486.10 | 0.05\% | 0.37\% | 10.71\% | 11.10\% | 0.0051\% |
| LABORATORY CRP OF AMER HLDGS | LH | 13,379.70 | 0.07\% | 0.00\% | 11.17\% | 11.17\% | 0.0073\% |
| LKQ CORP | LKQ | 9,551.28 | 0.05\% | 0.00\% | 15.43\% | 15.43\% | 0.0072\% |
| L3 TECHNOLOGIES INC | LLL | 11,796.56 | N/A | 1.42\% | N/A | N/A | N/A |
| LINEAR TECHNOLOGY CORP | LLTC | 15,024.77 | 0.07\% | 2.05\% | 8.27\% | 10.40\% | 0.0076\% |
| ELI LILLY \& CO | LLY | 81,868.80 | 0.40\% | 2.76\% | 12.16\% | 15.09\% | 0.0602\% |
| LOCKHEED MARTIN CORP | LMT | 73,847.87 | 0.36\% | 2.70\% | 7.65\% | 10.45\% | 0.0376\% |
| LINCOLN NATIONAL CORP | LNC | 15,256.40 | 0.07\% | 1.53\% | 8.00\% | 9.59\% | 0.0071\% |
| ALLIANT ENERGY CORP | LNT | 8,601.79 | 0.04\% | 3.11\% | 6.98\% | 10.20\% | 0.0043\% |
| LOWE'S COS INC | LOW | 62,220.17 | 0.30\% | 1.82\% | 15.35\% | 17.31\% | 0.0525\% |
| LAM RESEARCH CORP | LRCX | 17,505.85 | 0.09\% | 1.25\% | 9.94\% | 11.25\% | 0.0096\% |
| LEUCADIA NATIONAL CORP | LUK | 8,366.91 | 0.04\% | 1.08\% | 18.00\% | 19.17\% | 0.0078\% |
| SOUTHWEST AIRLINES CO | LUV | 30,786.04 | 0.15\% | 0.73\% | 8.12\% | 8.88\% | 0.0133\% |
| LEVEL 3 Communications inc | LVLT | 21,005.25 | 0.10\% | 0.00\% | 7.50\% | 7.50\% | 0.0077\% |
| LYONDELLBASELL INDU-CL A | LYB | 35,711.31 | 0.17\% | 3.80\% | 4.15\% | 8.03\% | 0.0140\% |
| MACY'S INC | M | 10,793.21 | 0.05\% | 4.27\% | 7.33\% | 11.75\% | 0.0062\% |
| MASTERCARD INC - A | MA | 114,703.71 | 0.56\% | 0.72\% | 15.40\% | 16.18\% | 0.0904\% |
| MID-AMERICA APARTMENT COMM | MAA | 11,032.02 | 0.05\% | 3.39\% | 7.00\% | 10.51\% | 0.0056\% |
| MACERICH CO/THE | MAC | 10,141.24 | 0.05\% | 6.09\% | 6.81\% | 13.11\% | 0.0065\% |
| MARRIOTT INTERNATIONAL -CL A | MAR | 32,261.44 | 0.16\% | 1.39\% | 11.36\% | 12.83\% | 0.0202\% |
| MASCO CORP | MAS | 10,482.85 | 0.05\% | 1.24\% | 15.57\% | 16.91\% | 0.0086\% |
| MATTEL INC | MAT | 9,608.05 | 0.05\% | 5.40\% | 10.50\% | 16.19\% | 0.0076\% |
| MCDONALD'S CORP | MCD | 99,536.97 | 0.49\% | 3.01\% | 10.19\% | 13.34\% | 0.0647\% |
| MICROCHIP TECHNOLOGY INC | MCHP | 13,773.19 | 0.07\% | 2.21\% | 14.36\% | 16.73\% | 0.0112\% |
| MCKESSON CORP | MCK | 32,798.44 | 0.16\% | 0.78\% | 10.23\% | 11.05\% | 0.0177\% |
| MOODY'S CORP | MCO | 18,339.01 | 0.09\% | 1.51\% | 10.00\% | 11.58\% | 0.0104\% |
| MONDELEZ INTERNATIONAL INC-A | MDLZ | 69,127.87 | 0.34\% | 1.53\% | 11.58\% | 13.20\% | 0.0445\% |
| MEDTRONIC PLC | MDT | 96,538.96 | 0.47\% | 2.45\% | 7.24\% | 9.78\% | 0.0460\% |
| METLIFE INC | MET | 59,924.86 | 0.29\% | 2.90\% | 8.22\% | 11.24\% | 0.0328\% |
| MOHAWK INDUSTRIES INC | MHK | 15,031.83 | 0.07\% | 0.00\% | 9.33\% | 9.33\% | 0.0068\% |
| MEAD JOHNSON NUTRITION CO | MJN | 13,202.18 | 0.06\% | 2.40\% | 6.73\% | 9.20\% | 0.0059\% |
| MCCORMICK \& CO-NON VTG SHRS | мкС | 11,783.75 | 0.06\% | 1.78\% | 8.11\% | 9.97\% | 0.0057\% |
| MARTIN MARIETTA MATERIALS | MLM | 14,088.22 | 0.07\% | 0.74\% | 23.82\% | 24.65\% | 0.0169\% |
| MARSH \& MCLENNAN COS | MMC | 34,807.74 | 0.17\% | 1.93\% | 11.76\% | 13.80\% | 0.0234\% |
| 3M CO | MMм | 107,109.14 | 0.52\% | 2.49\% | 9.08\% | 11.68\% | 0.0610\% |
| MALLINCKRODT PLC | MNK | 5,325.73 | 0.03\% | 0.00\% | 6.00\% | 6.00\% | 0.0016\% |
| MONSTER BEVERAGE CORP | MNST | 25,865.15 | 0.13\% | 0.00\% | 19.80\% | 19.80\% | 0.0250\% |
| ALTRIA GROUP INC | мо | 132,169.85 | 0.64\% | 3.48\% | 7.77\% | 11.38\% | 0.0733\% |
| MONSANTO CO | MON | 46,163.64 | 0.22\% | 2.15\% | 10.78\% | 13.05\% | 0.0293\% |
| MOSAIC CO/THE | mos | 10,388.08 | 0.05\% | 3.71\% | 2.60\% | 6.36\% | 0.0032\% |
| MARATHON PETROLEUM CORP | MPC | 28,359.51 | 0.14\% | 2.50\% | 2.43\% | 4.96\% | 0.0069\% |
| MERCK \& CO. INC. | MRK | 165,290.39 | 0.81\% | 3.08\% | 6.16\% | 9.33\% | 0.0752\% |
| MARATHON OIL CORP | MRO | 15,097.31 | 0.07\% | 1.12\% | 6.50\% | 7.66\% | 0.0056\% |
| MORGAN STANLEY | MS | 80,943.34 | 0.39\% | 1.62\% | 9.15\% | 10.84\% | 0.0428\% |
| MICROSOFT CORP | MSFT | 485,726.15 | 2.37\% | 2.47\% | 8.20\% | 10.77\% | 0.2550\% |
| MOTOROLA SOLUTIONS INC | MSI | 13,887.82 | 0.07\% | 1.99\% | 5.87\% | 7.91\% | 0.0054\% |
| M \& T BANK CORP | мтв | 24,317.83 | 0.12\% | 1.79\% | 3.00\% | 4.82\% | 0.0057\% |
| METTLER-TOLEDO INTERNATIONAL | MTD | 11,117.58 | 0.05\% | 0.00\% | 12.14\% | 12.14\% | 0.0066\% |
| MICRON TECHNOLOGY INC | MU | 23,481.73 | 0.11\% | 0.00\% | 10.00\% | 10.00\% | 0.0114\% |
| MURPHY OIL CORP | MUR | 5,587.89 | N/A | 3.76\% | N/A | N/A | N/A |
| MYLAN NV | MYL | 20,879.81 | 0.10\% | 0.00\% | 11.47\% | 11.47\% | 0.0117\% |
| NAVIENT CORP | NAVI | 5,049.62 | N/A | 3.88\% | N/A | N/A | N/A |
| NOBLE ENERGY INC | NBL | 16,565.00 | 0.08\% | 1.04\% | 3.75\% | 4.81\% | 0.0039\% |
| NASDAQ INC | NDAQ | 11,066.94 | 0.05\% | 1.83\% | 15.90\% | 17.87\% | 0.0096\% |
| NEXTERA ENERGY INC | NEE | 56,687.82 | 0.28\% | 2.94\% | 6.34\% | 9.38\% | 0.0259\% |
| NEWMONT MINING CORP | NEM | 18,252.50 | 0.09\% | 0.39\% | 4.87\% | 5.26\% | 0.0047\% |
| NETFLIX INC | NFLX | 54,750.32 | 0.27\% | 0.00\% | 38.29\% | 38.29\% | 0.1022\% |
| NEWFIELD EXPLORATION CO | NFX | 8,289.51 | 0.04\% | 0.00\% | 19.62\% | 19.62\% | 0.0079\% |
| NISOURCE INC | NI | 7,158.32 | 0.03\% | 2.91\% | 7.52\% | 10.55\% | 0.0037\% |
| NIKE INC -CL B | NKE | 86,902.36 | 0.42\% | 1.33\% | 11.93\% | 13.34\% | 0.0565\% |
| NIELSEN HOLDINGS PLC | NLSN | 15,119.29 | 0.07\% | 2.86\% | 10.67\% | 13.68\% | 0.0101\% |
| NORTHROP GRUMMAN CORP | NOC | 41,121.91 | 0.20\% | 1.50\% | 8.16\% | 9.71\% | 0.0195\% |
| NATIONAL OILWELL VARCO INC | NOV | 14,438.84 | 0.07\% | 1.60\% | -14.54\% | -13.06\% | -0.0092\% |
| NRG ENERGY INC | NRG | 3,898.88 | 0.02\% | 1.75\% | -6.00\% | -4.30\% | -0.0008\% |
| NORFOLK SOUTHERN CORP | NSC | 31,331.24 | 0.15\% | 2.20\% | 10.28\% | 12.59\% | 0.0192\% |
| NETAPP INC | NTAP | 9,803.44 | 0.05\% | 2.14\% | 10.64\% | 12.90\% | 0.0062\% |
| NORTHERN TRUST CORP | NTRS | 20,333.51 | 0.10\% | 1.65\% | 12.90\% | 14.66\% | 0.0145\% |
| NUCOR CORP | NUE | 19,083.63 | 0.09\% | 2.50\% | 10.73\% | 13.36\% | 0.0124\% |
| NVIDIA CORP | NVDA | 56,136.85 | 0.27\% | 0.46\% | 11.43\% | 11.92\% | 0.0326\% |
| NEWELL BRANDS INC | NWL | 21,896.14 | 0.11\% | 1.67\% | 13.47\% | 15.24\% | 0.0163\% |
| NEWS CORP - CLASS B | NWS | 6,906.84 | 0.03\% | 1.65\% | 10.49\% | 12.23\% | 0.0041\% |
| REALTY INCOME CORP | $\bigcirc$ | 14,828.08 | 0.07\% | 4.19\% | 5.20\% | 9.49\% | 0.0069\% |
| ONEOK INC | OKE | 12,313.43 | 0.06\% | 4.21\% | 12.25\% | 16.71\% | 0.0100\% |
| OMNICOM GROUP | OMC | 20,061.67 | 0.10\% | 2.52\% | 4.00\% | 6.57\% | 0.0064\% |
| ORACLE CORP | ORCL | 157,489.33 | 0.77\% | 1.53\% | 9.54\% | 11.14\% | 0.0855\% |
| O'REILLY AUTOMOTIVE INC | ORLY | 26,407.57 | 0.13\% | 0.00\% | 15.54\% | 15.54\% | 0.0200\% |
| OCCIDENTAL PETROLEUM CORP | OXY | 55,625.28 | 0.27\% | 4.15\% | 10.13\% | 14.49\% | 0.0393\% |
| PAYCHEX INC | PAYX | 21,869.70 | 0.11\% | 3.01\% | 8.71\% | 11.86\% | 0.0126\% |
| PEOPLE'S UNITED FINANCIAL | PBCT | 6,056.55 | N/A | 3.50\% | N/A | N/A | N/A |
| PITNEY BOWES INC | PBI | 2,908.98 | 0.01\% | 4.79\% | 10.00\% | 15.03\% | 0.0021\% |
| PACCAR INC | PCAR | 22,848.02 | 0.11\% | 2.52\% | 5.70\% | 8.29\% | 0.0092\% |
| P G \& E Corp | PCG | 30,501.81 | 0.15\% | 3.20\% | 4.87\% | 8.14\% | 0.0121\% |


| Ex-Ante Market Risk Premium Market DCF Method Based - Bloomberg |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | [1] | [2] | [3] |  |  |  |
|  |  | S\&P 500 Est. Required Market Return | Current 30-Year Treasury (30-day average) | Implied Market Risk Premium |  |  |  |
|  |  | 12.60\% | 3.08\% | 9.52\% |  |  |  |
|  |  | [4] | [5] | [6] | [7] | [8] | [9] |
| Company | Ticker | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est | DCF Result | Weighted DCF Result |
| PRICELINE GROUP INC/THE | PCLN | 72,983.24 | 0.36\% | 0.00\% | 17.30\% | 17.30\% | 0.0615\% |
| PATTERSON COS INC | PDCO | 4,160.15 | 0.02\% | 2.38\% | 4.01\% | 6.44\% | 0.0013\% |
| PUBLIC SERVICE ENTERPRISE GP | PEG | 21,976.13 | 0.11\% | 3.77\% | 2.39\% | 6.21\% | 0.0067\% |
| PEPSICO INC | PEP | 150,460.15 | 0.73\% | 2.82\% | 6.77\% | 9.68\% | 0.0710\% |
| PFIZER INC | PFE | 199,466.83 | 0.97\% | 3.65\% | 4.99\% | 8.73\% | 0.0848\% |
| PRINCIPAL FINANCIAL GROUP | PFG | 16,846.59 | 0.08\% | 2.75\% | 8.44\% | 11.30\% | 0.0093\% |
| PROCTER \& GAMBLE CO/THE | PG | 225,746.73 | 1.10\% | 3.23\% | 8.02\% | 11.38\% | 0.1252\% |
| PROGRESSIVE CORP | PGR | 20,536.42 | 0.10\% | 1.79\% | 9.16\% | 11.04\% | 0.0110\% |
| PARKER HANNIFIN CORP | PH | 19,073.31 | 0.09\% | 1.80\% | 8.57\% | 10.45\% | 0.0097\% |
| PULTEGROUP INC | PHM | 6,121.99 | 0.03\% | 1.94\% | 23.92\% | 26.09\% | 0.0078\% |
| PERKINELMER INC | PKI | 5,767.56 | 0.03\% | 0.53\% | 6.67\% | 7.21\% | 0.0020\% |
| PROLOGIS INC | PLD | 27,916.11 | 0.14\% | 3.18\% | 4.86\% | 8.11\% | 0.0110\% |
| PHILIP MORRIS INTERNATIONAL | PM | 141,855.43 | 0.69\% | 4.51\% | 9.40\% | 14.12\% | 0.0976\% |
| PNC FINANCIAL SERVICES GROUP | PNC | 57,480.16 | 0.28\% | 1.80\% | 4.23\% | 6.06\% | 0.0170\% |
| PENTAIR PLC | PNR | 10,426.41 | 0.05\% | 2.34\% | 6.44\% | 8.85\% | 0.0045\% |
| PINNACLE WEST CAPITAL | PNW | 8,618.43 | 0.04\% | 3.28\% | 5.13\% | 8.50\% | 0.0036\% |
| PPG INDUSTRIES INC | PPG | 25,153.47 | 0.12\% | 1.64\% | 7.81\% | 9.52\% | 0.0117\% |
| PPL CORP | PPL | 23,068.76 | 0.11\% | 4.47\% | 0.75\% | 5.24\% | 0.0059\% |
| PERRIGO CO PLC | PRGO | 12,291.49 | 0.06\% | 0.68\% | 4.51\% | 5.20\% | 0.0031\% |
| PRUDENTIAL FINANCIAL INC | PRU | 45,175.80 | 0.22\% | 2.69\% | 6.88\% | 9.65\% | 0.0213\% |
| PUBLIC STORAGE | PSA | 39,058.75 | 0.19\% | 3.24\% | 5.38\% | 8.70\% | 0.0166\% |
| PHILLIPS 66 | PSX | 45,647.31 | 0.22\% | 2.78\% | 4.56\% | 7.40\% | 0.0165\% |
| PVH CORP | PVH | 7,192.57 | 0.04\% | 0.17\% | 6.72\% | 6.90\% | 0.0024\% |
| QUANTA SERVICES INC | PWR | 5,330.06 | 0.03\% | 0.00\% | 2.60\% | 2.60\% | 0.0007\% |
| PRAXAIR INC | PX | 33,561.75 | 0.16\% | 2.55\% | 6.00\% | 8.63\% | 0.0141\% |
| PIoNEER NATURAL RESOURCES CO | PXD | 31,688.55 | 0.15\% | 0.04\% | 20.00\% | 20.05\% | 0.0310\% |
| PAYPAL HOLDINGS INC | PYPL | 49,074.29 | 0.24\% | 0.00\% | 14.83\% | 14.83\% | 0.0355\% |
| QUALCOMM INC | QCOM | 96,942.84 | 0.47\% | 3.30\% | 9.20\% | 12.65\% | 0.0598\% |
| QORVO INC | QRVO | 6,733.80 | 0.03\% | 0.00\% | 14.93\% | 14.93\% | 0.0049\% |
| RYDER SYSTEM INC | R | 3,980.72 | 0.02\% | 2.26\% | 15.00\% | 17.43\% | 0.0034\% |
| REYNOLDS AMERICAN INC | RAI | 80,385.95 | 0.39\% | 3.14\% | 8.79\% | 12.07\% | 0.0473\% |
| ROYAL CARIBBEAN CRUISES LTD | RCL | 18,067.81 | 0.09\% | 2.03\% | 18.55\% | 20.77\% | 0.0183\% |
| REGENERON PHARMACEUTICALS | REGN | 39,686.36 | 0.19\% | 0.00\% | 21.85\% | 21.85\% | 0.0423\% |
| REGIONS FINANCIAL CORP | RF | 17,750.66 | 0.09\% | 1.80\% | 6.74\% | 8.60\% | 0.0074\% |
| ROBERT HALF INTL INC | RHI | 6,361.83 | 0.03\% | 1.79\% | 10.85\% | 12.73\% | 0.0039\% |
| RED HAT INC | RHT | 12,616.62 | 0.06\% | 0.00\% | 17.45\% | 17.45\% | 0.0107\% |
| TRANSOCEAN LTD | RIG | 6,126.03 | N/A | 0.00\% | N/A | N/A | N/A |
| RALPH LAUREN CORP | RL | 7,536.57 | 0.04\% | 2.24\% | 8.06\% | 10.40\% | 0.0038\% |
| ROCKWELL AUTOMATION INC | ROK | 17,625.10 | 0.09\% | 2.21\% | 5.26\% | 7.53\% | 0.0065\% |
| ROPER TECHNOLOGIES INC | ROP | 18,746.05 | 0.09\% | 0.63\% | 11.40\% | 12.06\% | 0.0110\% |
| ROSS STORES INC | ROST | 25,901.60 | 0.13\% | 0.82\% | 12.79\% | 13.66\% | 0.0172\% |
| RANGE RESOURCES CORP | RRC | 8,165.68 | 0.04\% | 0.24\% | -14.59\% | -14.37\% | -0.0057\% |
| REPUBLIC SERVICES INC | RSG | 19,248.64 | 0.09\% | 2.16\% | 8.55\% | 10.79\% | 0.0101\% |
| RAYTHEON COMPANY | RTN | 42,279.30 | 0.21\% | 2.01\% | 8.08\% | 10.17\% | 0.0210\% |
| STARBUCKS CORP | sbux | 80,439.96 | 0.39\% | 1.81\% | 17.77\% | 19.74\% | 0.0774\% |
| SCANA CORP | SCG | 10,454.37 | 0.05\% | 3.13\% | 6.33\% | 9.57\% | 0.0049\% |
| SCHWAB (CHARLES) CORP | SCHW | 53,384.82 | 0.26\% | 0.67\% | 18.95\% | 19.68\% | 0.0512\% |
| SPECTRA ENERGY CORP | SE | 29,344.58 | N/A | 3.90\% | N/A | N/A | N/A |
| SEALED AIR CORP | SEE | 8,851.55 | 0.04\% | 1.33\% | 4.43\% | 5.80\% | 0.0025\% |
| SHERWIN-WILLIAMS CO/THE | SHW | 25,230.03 | 0.12\% | 1.24\% | 13.86\% | 15.18\% | 0.0187\% |
| SIGNET JEWELERS LTD | SIG | 6,592.77 | 0.03\% | 1.10\% | 10.00\% | 11.15\% | 0.0036\% |
| JM Smucker Colthe | SJM | 15,080.57 | 0.07\% | 2.27\% | 6.67\% | 9.02\% | 0.0066\% |
| SCHLUMBERGER LTD | SLB | 117,732.52 | 0.57\% | 2.36\% | 7.35\% | 9.80\% | 0.0562\% |
| SL GREEN REALTY CORP | SLG | 11,131.28 | 0.05\% | 2.68\% | 4.54\% | 7.27\% | 0.0039\% |
| SNAP-ON INC | SNA | 9,922.29 | 0.05\% | 1.50\% | 4.40\% | 5.93\% | 0.0029\% |
| SCRIPPS NETWORKS INTER-CL A | SNI | 9,338.37 | 0.05\% | 1.39\% | 9.89\% | 11.35\% | 0.0052\% |
| SOUTHERN CO/THE | so | 48,019.97 | 0.23\% | 4.54\% | 4.40\% | 9.04\% | 0.0211\% |
| SIMON PROPERTY GROUP INC | SPG | 55,990.84 | 0.27\% | 3.66\% | 8.29\% | 12.10\% | 0.0330\% |
| S\&P GLOBAL INC | SPGI | 28,081.26 | 0.14\% | 1.33\% | 10.67\% | 12.07\% | 0.0165\% |
| STAPLES INC | SPLS | 5,828.89 | 0.03\% | 5.36\% | 0.52\% | 5.89\% | 0.0017\% |
| STERICYCLE INC | SRCL | 6,506.33 | 0.03\% | 0.22\% | 9.45\% | 9.68\% | 0.0031\% |
| SEMPRA ENERGY | SRE | 25,251.16 | 0.12\% | 2.98\% | 6.98\% | 10.06\% | 0.0124\% |
| SUNTRUST BANKS INC | STI | 27,146.02 | 0.13\% | 1.81\% | 7.51\% | 9.38\% | 0.0124\% |
| ST JUDE MEDICAL INC | STJ | 22,983.03 | 0.11\% | 1.54\% | 12.08\% | 13.72\% | 0.0154\% |
| STATE STREET CORP | STT | 30,492.32 | 0.15\% | 1.82\% | 7.45\% | 9.33\% | 0.0139\% |
| SEAGATE TECHNOLOGY | STX | 11,645.43 | 0.06\% | 5.73\% | 8.79\% | 14.77\% | 0.0084\% |
| CONSTELLATION BRANDS INC-A | STZ | 31,092.40 | 0.15\% | 1.04\% | 15.56\% | 16.68\% | 0.0253\% |
| STANLEY BLACK \& DECKER INC | swk | 17,454.27 | 0.09\% | 1.94\% | 10.17\% | 12.20\% | 0.0104\% |
| SKYWORKS SOLUTIONS INC | SWKS | 14,053.11 | 0.07\% | 1.50\% | 15.56\% | 17.18\% | 0.0118\% |
| SOUTHWESTERN ENERGY CO | SWN | 4,981.78 | 0.02\% | 0.00\% | -12.48\% | -12.48\% | -0.0030\% |
| SYNCHRONY FINANCIAL | SYF | 30,467.94 | 0.15\% | 0.68\% | 5.02\% | 5.72\% | 0.0085\% |
| STRYKER CORP | SYK | 44,256.45 | 0.22\% | 1.30\% | 9.31\% | 10.68\% | 0.0230\% |
| SYMANTEC CORP | SYMC | 14,881.02 | 0.07\% | 1.33\% | 10.95\% | 12.35\% | 0.0090\% |
| SYSCO CORP | SYY | 29,917.14 | 0.15\% | 2.35\% | 9.75\% | 12.21\% | 0.0178\% |
| AT\&T INC | T | 262,282.11 | 1.28\% | 4.52\% | 4.85\% | 9.48\% | 0.1212\% |
| MOLSON COORS BREWING CO-B | TAP | 21,155.87 | 0.10\% | 1.66\% | 12.70\% | 14.47\% | 0.0149\% |
| TERADATA CORP | TDC | 3,603.43 | 0.02\% | 0.00\% | 7.22\% | 7.22\% | 0.0013\% |
| TRANSDIGM GROUP INC | TDG | 13,358.27 | 0.07\% | 0.00\% | 10.63\% | 10.63\% | 0.0069\% |
| TE CONNECTIVITY LTD | TEL | 24,493.79 | 0.12\% | 2.19\% | 6.00\% | 8.26\% | 0.0099\% |
| TEGNA INC | TGNA | 4,601.38 | 0.02\% | 2.61\% | 2.00\% | 4.64\% | 0.0010\% |
| TARGET CORP | TGT | 40,599.35 | 0.20\% | 3.20\% | 7.21\% | 10.53\% | 0.0208\% |
| TIFFANY \& CO | TIF | 9,683.84 | 0.05\% | 2.20\% | 9.46\% | 11.76\% | 0.0055\% |
| TJX COMPANIES INC | TJX | 49,225.02 | 0.24\% | 1.35\% | 11.43\% | 12.86\% | 0.0308\% |
| TORCHMARK CORP | тMK | 8,762.73 | 0.04\% | 0.75\% | 7.47\% | 8.24\% | 0.0035\% |
| THERMO FISHER SCIENTIFIC INC | TMO | 56,437.25 | 0.28\% | 0.42\% | 12.50\% | 12.95\% | 0.0356\% |
| TRIPADVISORINC | TRIP | 6,872.73 | 0.03\% | 0.00\% | 10.31\% | 10.31\% | 0.0035\% |
| T ROWE PRICE GROUP INC | TROW | 18,535.00 | 0.09\% | 2.84\% | 10.45\% | 13.43\% | 0.0121\% |
| TRAVELERS COS InC/THE | TRV | 34,280.21 | 0.17\% | 2.16\% | 6.60\% | 8.83\% | 0.0148\% |



Notes:
1] Equals sum of Col. [9]
1] Equals sum of Col. [9]
2] Source: Bloomberg Professional
3] Equals [1] - [2]
4] Source: Bloomberg Professional
[5] Equals weight in S\&P 500 based on market capitalization
6] Source: Bloomberg Professional
7] Source: Bloomberg Professional
8] Equals $([6] \times(1+(0.5 \times[7])))+[7]$
[9] Equals Col. [5] x Col. [8]


Ex-Ante Market Risk Premium
Market DCF Method Based - Value Line

|  |  | $[1]$ <br> S\&P 500 <br> Est. Required <br> Market Return <br> $13.83 \%$ | $[2]$ <br> Current 30-Year <br> Treasury (30-day <br> average) <br> $3.08 \%$ | [3] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Implied Market Risk Premium |  |  |  |  |
|  |  | [4] | [5] | [6] |  |  |  |
| Company | Ticker |  | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| CHESAPEAKE ENERGY CORP | CHK | 5,693.87 | N/A | 0.00\% | N/A | N/A | N/A |
| C.H. ROBINSON WORLDWIDE INC | CHRW | 10,567.14 | 0.06\% | 2.42\% | 7.50\% | 10.01\% | 0.0055\% |
| CHARTER COMMUNICATIONS INC-A | CHTR | 78,768.94 | N/A | 0.00\% | N/A | N/A | N/A |
| CIGNA CORP | Cl | 35,165.40 | 0.18\% | 0.03\% | 12.50\% | 12.53\% | 0.0230\% |
| CINCINNATI FINANCIAL CORP | CINF | 12,564.96 | 0.07\% | 2.52\% | 6.50\% | 9.10\% | 0.0060\% |
| COLGATE-PALMOLIVE CO | CL | 58,992.51 | 0.31\% | 2.44\% | 14.00\% | 16.61\% | 0.0512\% |
| CLOROX COMPANY | CLX | 15,510.60 | 0.08\% | 2.71\% | 9.50\% | 12.34\% | 0.0100\% |
| COMERICA INC | CMA | 11,876.13 | 0.06\% | 1.33\% | 9.00\% | 10.39\% | 0.0064\% |
| COMCAST CORP-CLASS A | CMCSA | 169,938.90 | 0.89\% | 1.55\% | 10.00\% | 11.63\% | 0.1032\% |
| CME GROUP INC | CME | 40,790.93 | 0.21\% | 1.99\% | 9.50\% | 11.58\% | 0.0247\% |
| CHIPOTLE MEXICAN GRILL INC | CMG | 11,336.60 | 0.06\% | 0.00\% | 11.00\% | 11.00\% | 0.0065\% |
| CUMMINS INC | CMI | 23,264.11 | 0.12\% | 2.97\% | 5.00\% | 8.04\% | 0.0098\% |
| CMS ENERGY CORP | CMS | 11,607.77 | 0.06\% | 3.17\% | 6.00\% | 9.27\% | 0.0056\% |
| CENTENE CORP | CNC | 9,920.19 | 0.05\% | 0.00\% | 24.50\% | 24.50\% | 0.0127\% |
| CONDUENTINC | CNDT | N/A | N/A | 0.00\% | N/A | N/A | N/A |
| CENTERPOINT ENERGY INC | CNP | 10,698.14 | 0.06\% | 4.31\% | 2.00\% | 6.35\% | 0.0036\% |
| CAPITAL ONE FINANCIAL CORP | COF | 43,633.53 | 0.23\% | 1.79\% | 2.50\% | 4.31\% | 0.0098\% |
| CABOT OIL \& GAS CORP | COG | 10,372.82 | 0.05\% | 0.36\% | 39.00\% | 39.43\% | 0.0214\% |
| COACH INC | COH | 9,597.47 | 0.05\% | 3.94\% | 4.00\% | 8.02\% | 0.0040\% |
| ROCKWELL COLLINS INC | COL | 12,232.29 | 0.06\% | 1.41\% | 8.00\% | 9.47\% | 0.0061\% |
| COOPER COS INC/THE | COO | 8,437.24 | 0.04\% | 0.04\% | 14.50\% | 14.54\% | 0.0064\% |
| CONOCOPHILLIPS | COP | 63,859.45 | 0.33\% | 1.94\% | 7.00\% | 9.01\% | 0.0301\% |
| COSTCO WHOLESALE CORP | COST | 71,204.32 | 0.37\% | 1.11\% | 9.00\% | 10.16\% | 0.0378\% |
| COTY INC-CL A | СотY | 6,300.77 | 0.03\% | 2.67\% | 8.50\% | 11.28\% | 0.0037\% |
| CAMPBELL SOUP CO | CPB | 18,484.47 | 0.10\% | 2.33\% | 5.50\% | 7.89\% | 0.0076\% |
| SALESFORCE.COM INC | CRM | 47,881.50 | N/A | 0.00\% | N/A | N/A | N/A |
| CISCO SYSTEMS INC | CSCO | 153,183.30 | 0.80\% | 3.68\% | 6.50\% | 10.30\% | 0.0824\% |
| CSRA INC | CSRA | 5,213.55 | N/A | 1.26\% | N/A | N/A | N/A |
| CSX CORP | CSX | 34,366.09 | 0.18\% | 1.96\% | 7.00\% | 9.03\% | 0.0162\% |
| CINTAS CORP | CTAS | 12,514.94 | 0.07\% | 1.11\% | 10.00\% | 11.17\% | 0.0073\% |
| CENTURYLINK INC | CTL | 13,049.49 | 0.07\% | 9.05\% | 12.00\% | 21.59\% | 0.0147\% |
| COGNIZANT TECH SOLUTIONS-A | CTSH | 34,242.57 | 0.18\% | 0.00\% | 12.50\% | 12.50\% | 0.0224\% |
| CITRIX SYSTEMS INC | CTXS | 14,081.89 | 0.07\% | 0.00\% | 11.00\% | 11.00\% | 0.0081\% |
| CVS HEALTH CORP | CVS | 83,990.13 | 0.44\% | 2.16\% | 9.50\% | 11.76\% | 0.0516\% |
| CHEVRON CORP | cVX | 224,210.30 | 1.17\% | 3.64\% | 3.50\% | 7.20\% | 0.0844\% |
| CONCHO RESOURCES INC | CXO | 19,399.73 | 0.10\% | 0.00\% | 16.50\% | 16.50\% | 0.0167\% |
| DOMINION RESOURCES INC/VA | D | 48,047.01 | 0.25\% | 3.94\% | 10.00\% | 14.14\% | 0.0355\% |
| DELTA AIR LINES INC | DAL | 36,671.98 | 0.19\% | 1.63\% | 12.00\% | 13.73\% | 0.0263\% |
| DU PONT (E.I.) DE NEMOURS | DD | 65,259.48 | 0.34\% | 2.16\% | 6.50\% | 8.73\% | 0.0298\% |
| DEERE \& CO | DE | 32,413.87 | 0.17\% | 2.33\% | -2.00\% | 0.31\% | 0.0005\% |
| DISCOVER FINANCIAL SERVICES | DFS | 28,709.97 | 0.15\% | 1.66\% | 5.00\% | 6.70\% | 0.0101\% |
| DOLLAR GENERAL CORP | DG | 20,542.99 | 0.11\% | 1.55\% | 12.00\% | 13.64\% | 0.0146\% |
| QUEST DIAGNOSTICS INC | DGX | 12,761.59 | 0.07\% | 1.96\% | 10.00\% | 12.06\% | 0.0080\% |
| DR HORTON INC | DHI | 10,352.34 | 0.05\% | 1.44\% | 11.50\% | 13.02\% | 0.0070\% |
| DANAHER CORP | DHR | 54,173.03 | 0.28\% | 0.64\% | 8.00\% | 8.67\% | 0.0245\% |
| WALT DISNEY CO/THE | DIS | 179,214.00 | 0.94\% | 1.48\% | 10.00\% | 11.55\% | 0.1082\% |
| DISCOVERY COMMUNICATIONS-A | DISCA | 10,974.22 | 0.06\% | 0.00\% | 15.50\% | 15.50\% | 0.0089\% |
| DELPHI AUTOMOTIVE PLC | DLPH | 18,243.45 | 0.10\% | 1.84\% | 14.50\% | 16.47\% | 0.0157\% |
| DIGITAL REALTY TRUST INC | DLR | - | N/A | 3.96\% | N/A | N/A | N/A |
| DOLLAR TREE INC | DLTR | 18,717.16 | 0.10\% | 0.00\% | 21.00\% | 21.00\% | 0.0205\% |
| DUN \& BRADSTREET CORP | DNB | 4,363.63 | 0.02\% | 1.62\% | 4.50\% | 6.16\% | 0.0014\% |
| DOVER CORP | DOV | 11,744.23 | 0.06\% | 2.33\% | 3.50\% | 5.87\% | 0.0036\% |
| DOW ChEMICAL CO/THE | DOW | 65,881.13 | 0.34\% | 3.34\% | 10.00\% | 13.51\% | 0.0465\% |
| DR PEPPER SNAPPLE GROUP INC | DPS | 16,634.74 | 0.09\% | 2.41\% | 9.00\% | 11.52\% | 0.0100\% |
| DARDEN RESTAURANTS INC | DRI | 9,178.15 | 0.05\% | 3.06\% | 15.00\% | 18.29\% | 0.0088\% |
| DTE ENERGY COMPANY | DTE | 17,676.14 | 0.09\% | 3.41\% | 6.00\% | 9.51\% | 0.0088\% |
| DUKE ENERGY CORP | DUK | 53,583.53 | 0.28\% | 4.48\% | 4.50\% | 9.08\% | 0.0254\% |
| DAVITA INC | DVA | 13,020.46 | 0.07\% | 0.00\% | 10.50\% | 10.50\% | 0.0071\% |
| DEVON ENERGY CORP | DVN | 24,575.60 | 0.13\% | 0.51\% | 1.00\% | 1.51\% | 0.0019\% |
| ELECTRONIC ARTS INC | EA | 23,937.00 | 0.13\% | 0.00\% | 14.00\% | 14.00\% | 0.0175\% |
| EBAY INC | EBAY | 32,996.18 | 0.17\% | 0.00\% | 4.00\% | 4.00\% | 0.0069\% |
| ECOLAB INC | ECL | 34,575.15 | 0.18\% | 1.25\% | 8.50\% | 9.80\% | 0.0177\% |
| CONSOLIDATED EDISON INC | ED | 20,727.00 | 0.11\% | 3.76\% | 2.50\% | 6.31\% | 0.0068\% |
| EQUIFAX INC | EFX | 14,221.64 | 0.07\% | 1.11\% | 11.00\% | 12.17\% | 0.0090\% |
| EDISON INTERNATIONAL | EIX | 23,500.75 | 0.12\% | 3.01\% | 3.50\% | 6.56\% | 0.0081\% |
| ESTEE LAUDER COMPANIES-CL A | EL | 28,858.93 | 0.15\% | 1.73\% | 8.50\% | 10.30\% | 0.0155\% |
| EASTMAN Chemical co | EMN | 11,138.93 | 0.06\% | 2.69\% | 8.00\% | 10.80\% | 0.0063\% |
| EMERSON ELECTRIC CO | EMR | 36,440.11 | 0.19\% | 3.40\% | 5.00\% | 8.49\% | 0.0162\% |
| ENDO INTERNATIONAL PLC | ENDP | 3,514.49 | 0.02\% | 0.00\% | 32.00\% | 32.00\% | 0.0059\% |
| EOG RESOURCES INC | EOG | 56,848.25 | 0.30\% | 0.69\% | 4.00\% | 4.70\% | 0.0140\% |
| EQUINIX INC | EQIX | 25,056.88 | 0.13\% | 1.99\% | 19.50\% | 21.68\% | 0.0284\% |
| EQUITY RESIDENTIAL | EQR | - | N/A | 3.37\% | N/A | N/A | N/A |
| EQT CORP | EQT | 11,509.14 | 0.06\% | 0.18\% | 11.00\% | 11.19\% | 0.0067\% |
| EVERSOURCE ENERGY | ES | 17,568.16 | 0.09\% | 3.43\% | 6.00\% | 9.53\% | 0.0088\% |
| EXPRESS SCRIPTS HOLDING CO | ESRX | 42,193.93 | 0.22\% | 0.00\% | 15.50\% | 15.50\% | 0.0342\% |
| ESSEX PROPERTY TRUST INC | ESS | - | N/A | 2.96\% | N/A | N/A | N/A |
| E*TRADE FINANCIAL CORP | ETFC | 9,556.04 | 0.05\% | 0.00\% | 17.50\% | 17.50\% | 0.0087\% |
| EATON CORP PLC | ETN | 30,747.22 | 0.16\% | 3.35\% | 4.50\% | 7.93\% | 0.0127\% |
| ENTERGY CORP | ETR | 13,108.59 | 0.07\% | 4.78\% | 0.50\% | 5.29\% | 0.0036\% |
| ENVISION HEALTHCARE CORP | EVHC | N/A | N/A | 0.00\% | N/A | N/A | N/A |
| EDWARDS LIFESCIENCES CORP | EW | 19,617.66 | 0.10\% | 0.00\% | 19.50\% | 19.50\% | 0.0200\% |
| EXELON CORP | EXC | 32,600.66 | 0.17\% | 3.65\% | 6.00\% | 9.76\% | 0.0166\% |
| EXPEDITORS INTL WASH INC | EXPD | 9,695.35 | 0.05\% | 1.49\% | 10.00\% | 11.56\% | 0.0059\% |
| EXPEDIA INC | EXPE | 17,150.28 | 0.09\% | 0.91\% | 21.50\% | 22.51\% | 0.0202\% |
| EXTRA SPACE STORAGE INC | EXR |  | N/A | 4.28\% | N/A | N/A | N/A |
| FORD MOTOR CO | F | 48,395.50 | 0.25\% | 4.84\% | 5.00\% | 9.96\% | 0.0252\% |
| FASTENAL CO | FAST | 13,882.21 | 0.07\% | 2.50\% | 5.50\% | 8.07\% | 0.0059\% |
| FACEBOOK INC-A | FB | 338,346.80 | 1.77\% | 0.00\% | 37.50\% | 37.50\% | 0.6629\% |






## Notes:

1] Equals sum of Col. [9]
2] Source: Bloomberg Professional
3] Equals [1] - [2]
4] Source: Value
5] Equals weight in S\&P 500 based on market capitalization
[6] Source: Value Line
7] Source: Value Line
8] Equals ([6] x (1 + (0.5 x [7])) $)+[7$
[9] Equals Col. [5] x Col. [8]

|  | Bloomberg and Value Line Beta Coefficients |  |  |
| :--- | :---: | :---: | :---: |
|  |  |  | $[1]$ |
| Company | Ticker | Bloomberg | Value Line |
|  |  |  |  |
|  | ALE | 0.654 | 0.750 |
| ALLETE, Inc. | LNT | 0.553 | 0.700 |
| Alliant Energy Corp. | AEP | 0.555 | 0.650 |
| American Electric Power | AVA | 0.627 | 0.700 |
| Avista Corp. | BKH | 0.543 | 0.900 |
| Black Hills Corp. | CMS | 0.498 | 0.650 |
| CMS Energy Corp. | DTE | 0.552 | 0.650 |
| DTE Energy Co. | IDA | 0.691 | 0.750 |
| IDACORP, Inc. | NWE | 0.603 | 0.700 |
| NorthWestern Corporation | OGE | 0.658 | 0.900 |
| OGE Energy Corp. | OTTR | 0.825 | 0.850 |
| Otter Tail Corporation | PNW | 0.588 | 0.700 |
| Pinnacle West Capital | PNM | 0.612 | 0.750 |
| PNM Resources, Inc. | POR | 0.588 | 0.700 |
| Portland General Electric Co. | SCG | 0.541 | 0.700 |
| SCANA Corp. | WEC | 0.488 | 0.600 |
| WEC Energy Group Inc. | XEL | 0.455 | 0.600 |
| Xcel Energy, Inc. |  |  |  |
| Mean |  | 0.590 | 0.721 |

Notes:
[1] Source: Bloomberg Professional
[2] Source: Value Line

Capital Asset Pricing Model Results Bloomberg, and Value Line Derived Market Risk Premium

|  | [1] | [2] | [3] | [4] | [5] | [6] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Risk-Free Rate | $\begin{gathered} \text { Average } \\ \text { Beta } \\ \text { Coefficient } \\ \hline \end{gathered}$ | Bloomberg Market DCF Derived | Value Line Market DCF Derived | $\begin{gathered} \text { Bloomberg } \\ \text { MRP } \end{gathered}$ | Value Line MRP |
| PROXY GROUP AVERAGE BLOOMBERG BETA COEFFICIENT |  |  |  |  |  |  |
| Current 30-Year Treasury [7] | 3.08\% | 0.590 | 9.52\% | 10.75\% | 8.70\% | 9.42\% |
| Near-Term Projected 30-Year Treasury [8] | 3.40\% | 0.590 | 9.52\% | 10.75\% | 9.02\% | 9.74\% |
| Mean |  |  |  |  | 8.86\% 9.58\% |  |
|  |  | Average | Bloomberg | Value Line |  |  |
|  | Risk-Free Rate | Beta Coefficient | Market DCF Derived | Market DCF Derived | Bloomberg MRP | Value Line MRP |
| PROXY GROUP AVERAGE VALUE LINE AVERAGE BETA COEFFICIENT |  |  |  |  |  |  |
| Current 30-Year Treasury [7] | 3.08\% | 0.721 | 9.52\% | 10.75\% | 9.94\% | 10.82\% |
| Near-Term Projected 30-Year Treasury [8] | 3.40\% | 0.721 | 9.52\% | 10.75\% | 10.26\% | 11.14\% |
| Mean |  |  |  |  | 10.10\% | 10.98\% |

Notes:
[1] See Note [7]
[2] Source: RBH-4
[3] Source: RBH-3
[4] Source: RBH-3
[5] Equals Col. [1] + (Col. [2] x Col. [3])
[6] Equals Col. [1] + (Col. [2] x Col. [4])
[7] Source: Bloomberg Professional
[8] Source: Blue Chip Financial Forecasts, Vol. 36, No. 1, January 1, 2017, at 2.


## Notes:

[1] Constant of regression equation
[2] Slope of regression equation
[3] Source: Current = Bloomberg Professional,
Near Term Projected = Blue Chip Financial Forecasts, Vol. 36, No. 1, January 1, 2017, at 2,
Long Term Projected = Blue Chip Financial Forecasts, Vol. 35, No. 12, December 1, 2016, at 14.
[4] Equals [1] $+\ln ([3]) \times[2]$
[5] Equals [3] + [4]
[6] Source: SNL Financial
[7] Source: SNL Financial
[8] Source: Bloomberg Professional, equals 200-trading day average (i.e. lag period)
[9] Equals [7] - [8]

| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 01/01/1980 | 14.50\% | 9.36\% | 5.14\% |
| 01/07/1980 | 14.39\% | 9.38\% | 5.01\% |
| 01/09/1980 | 15.00\% | 9.40\% | 5.60\% |
| 01/14/1980 | 15.17\% | 9.42\% | 5.75\% |
| 01/17/1980 | 13.93\% | 9.44\% | 4.49\% |
| 01/23/1980 | 15.50\% | 9.47\% | 6.03\% |
| 01/30/1980 | 13.86\% | 9.52\% | 4.34\% |
| 01/31/1980 | 12.61\% | 9.53\% | 3.08\% |
| 02/06/1980 | 13.71\% | 9.58\% | 4.13\% |
| 02/13/1980 | 12.80\% | 9.63\% | 3.17\% |
| 02/14/1980 | 13.00\% | 9.65\% | 3.35\% |
| 02/19/1980 | 13.50\% | 9.68\% | 3.82\% |
| 02/27/1980 | 13.75\% | 9.78\% | 3.97\% |
| 02/29/1980 | 13.75\% | 9.81\% | 3.94\% |
| 02/29/1980 | 14.00\% | 9.81\% | 4.19\% |
| 02/29/1980 | 14.77\% | 9.81\% | 4.96\% |
| 03/07/1980 | 12.70\% | 9.89\% | 2.81\% |
| 03/14/1980 | 13.50\% | 9.97\% | 3.53\% |
| 03/26/1980 | 14.16\% | 10.10\% | 4.06\% |
| 03/27/1980 | 14.24\% | 10.12\% | 4.12\% |
| 03/28/1980 | 14.50\% | 10.13\% | 4.37\% |
| 04/11/1980 | 12.75\% | 10.27\% | 2.48\% |
| 04/14/1980 | 13.85\% | 10.29\% | 3.56\% |
| 04/16/1980 | 15.50\% | 10.31\% | 5.19\% |
| 04/22/1980 | 13.25\% | 10.35\% | 2.90\% |
| 04/22/1980 | 13.90\% | 10.35\% | 3.55\% |
| 04/24/1980 | 16.80\% | 10.38\% | 6.43\% |
| 04/29/1980 | 15.50\% | 10.41\% | 5.09\% |
| 05/06/1980 | 13.70\% | 10.45\% | 3.25\% |
| 05/07/1980 | 15.00\% | 10.45\% | 4.55\% |
| 05/08/1980 | 13.75\% | 10.46\% | 3.29\% |
| 05/09/1980 | 14.35\% | 10.47\% | 3.88\% |
| 05/13/1980 | 13.60\% | 10.48\% | 3.12\% |
| 05/15/1980 | 13.25\% | 10.49\% | 2.76\% |
| 05/19/1980 | 13.75\% | 10.51\% | 3.24\% |
| 05/27/1980 | 13.62\% | 10.54\% | 3.08\% |
| 05/27/1980 | 14.60\% | 10.54\% | 4.06\% |
| 05/29/1980 | 16.00\% | 10.56\% | 5.44\% |
| 05/30/1980 | 13.80\% | 10.56\% | 3.24\% |
| 06/02/1980 | 15.63\% | 10.57\% | 5.06\% |
| 06/09/1980 | 15.90\% | 10.60\% | 5.30\% |
| 06/10/1980 | 13.78\% | 10.60\% | 3.18\% |
| 06/12/1980 | 14.25\% | 10.61\% | 3.64\% |
| 06/19/1980 | 13.40\% | 10.62\% | 2.78\% |
| 06/30/1980 | 13.00\% | 10.65\% | 2.35\% |
| 06/30/1980 | 13.40\% | 10.65\% | 2.75\% |
| 07/09/1980 | 14.75\% | 10.67\% | 4.08\% |
| 07/10/1980 | 15.00\% | 10.68\% | 4.32\% |
| 07/15/1980 | 15.80\% | 10.70\% | 5.10\% |
| 07/18/1980 | 13.80\% | 10.71\% | 3.09\% |
| 07/22/1980 | 14.10\% | 10.72\% | 3.38\% |
| 07/24/1980 | 15.00\% | 10.73\% | 4.27\% |
| 07/25/1980 | 13.48\% | 10.73\% | 2.75\% |
| 07/31/1980 | 14.58\% | 10.75\% | 3.83\% |
| 08/08/1980 | 13.50\% | 10.78\% | 2.72\% |
| 08/08/1980 | 14.00\% | 10.78\% | 3.22\% |
| 08/08/1980 | 15.45\% | 10.78\% | 4.67\% |
| 08/11/1980 | 14.85\% | 10.78\% | 4.07\% |
| 08/14/1980 | 14.00\% | 10.79\% | 3.21\% |
| 08/14/1980 | 16.25\% | 10.79\% | 5.46\% |
| 08/25/1980 | 13.75\% | 10.82\% | 2.93\% |
| 08/27/1980 | 13.80\% | 10.83\% | 2.97\% |
| 08/29/1980 | 12.50\% | 10.84\% | 1.66\% |
| 09/15/1980 | 13.50\% | 10.88\% | 2.62\% |
| 09/15/1980 | 13.93\% | 10.88\% | 3.05\% |
| 09/15/1980 | 15.80\% | 10.88\% | 4.92\% |
| 09/24/1980 | 12.50\% | 10.93\% | 1.57\% |
| 09/24/1980 | 15.00\% | 10.93\% | 4.07\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 09/26/1980 | 13.75\% | 10.94\% | 2.81\% |
| 09/30/1980 | 14.10\% | 10.96\% | 3.14\% |
| 09/30/1980 | 14.20\% | 10.96\% | 3.24\% |
| 10/01/1980 | 13.90\% | 10.97\% | 2.93\% |
| 10/03/1980 | 15.50\% | 10.98\% | 4.52\% |
| 10/07/1980 | 12.50\% | 10.99\% | 1.51\% |
| 10/09/1980 | 13.25\% | 11.00\% | 2.25\% |
| 10/09/1980 | 14.50\% | 11.00\% | 3.50\% |
| 10/09/1980 | 14.50\% | 11.00\% | 3.50\% |
| 10/16/1980 | 16.10\% | 11.02\% | 5.08\% |
| 10/17/1980 | 14.50\% | 11.03\% | 3.47\% |
| 10/31/1980 | 13.75\% | 11.11\% | 2.64\% |
| 10/31/1980 | 14.25\% | 11.11\% | 3.14\% |
| 11/04/1980 | 15.00\% | 11.12\% | 3.88\% |
| 11/05/1980 | 13.75\% | 11.12\% | 2.63\% |
| 11/05/1980 | 14.00\% | 11.12\% | 2.88\% |
| 11/08/1980 | 13.75\% | 11.14\% | 2.61\% |
| 11/10/1980 | 14.85\% | 11.15\% | 3.70\% |
| 11/17/1980 | 14.00\% | 11.18\% | 2.82\% |
| 11/18/1980 | 14.00\% | 11.19\% | 2.81\% |
| 11/19/1980 | 13.00\% | 11.19\% | 1.81\% |
| 11/24/1980 | 14.00\% | 11.21\% | 2.79\% |
| 11/26/1980 | 14.00\% | 11.21\% | 2.79\% |
| 12/08/1980 | 14.15\% | 11.22\% | 2.93\% |
| 12/08/1980 | 15.10\% | 11.22\% | 3.88\% |
| 12/09/1980 | 15.35\% | 11.22\% | 4.13\% |
| 12/12/1980 | 15.45\% | 11.23\% | 4.22\% |
| 12/17/1980 | 13.25\% | 11.23\% | 2.02\% |
| 12/18/1980 | 15.80\% | 11.23\% | 4.57\% |
| 12/19/1980 | 14.50\% | 11.23\% | 3.27\% |
| 12/19/1980 | 14.64\% | 11.23\% | 3.41\% |
| 12/22/1980 | 13.45\% | 11.23\% | 2.22\% |
| 12/22/1980 | 15.00\% | 11.23\% | 3.77\% |
| 12/30/1980 | 14.50\% | 11.22\% | 3.28\% |
| 12/30/1980 | 14.95\% | 11.22\% | 3.73\% |
| 12/31/1980 | 13.39\% | 11.22\% | 2.17\% |
| 01/02/1981 | 15.25\% | 11.22\% | 4.03\% |
| 01/07/1981 | 14.30\% | 11.21\% | 3.09\% |
| 01/19/1981 | 15.25\% | 11.20\% | 4.05\% |
| 01/23/1981 | 13.10\% | 11.20\% | 1.90\% |
| 01/23/1981 | 14.40\% | 11.20\% | 3.20\% |
| 01/26/1981 | 15.25\% | 11.20\% | 4.05\% |
| 01/27/1981 | 15.00\% | 11.21\% | 3.79\% |
| 01/31/1981 | 13.47\% | 11.22\% | 2.25\% |
| 02/03/1981 | 15.25\% | 11.23\% | 4.02\% |
| 02/05/1981 | 15.75\% | 11.25\% | 4.50\% |
| 02/11/1981 | 15.60\% | 11.28\% | 4.32\% |
| 02/20/1981 | 15.25\% | 11.33\% | 3.92\% |
| 03/11/1981 | 15.40\% | 11.49\% | 3.91\% |
| 03/12/1981 | 14.51\% | 11.50\% | 3.01\% |
| 03/12/1981 | 16.00\% | 11.50\% | 4.50\% |
| 03/13/1981 | 13.02\% | 11.52\% | 1.50\% |
| 03/18/1981 | 16.19\% | 11.55\% | 4.64\% |
| 03/19/1981 | 13.75\% | 11.56\% | 2.19\% |
| 03/23/1981 | 14.30\% | 11.58\% | 2.72\% |
| 03/25/1981 | 15.30\% | 11.60\% | 3.70\% |
| 04/01/1981 | 14.53\% | 11.68\% | 2.85\% |
| 04/03/1981 | 19.10\% | 11.71\% | 7.39\% |
| 04/09/1981 | 15.00\% | 11.78\% | 3.22\% |
| 04/09/1981 | 15.30\% | 11.78\% | 3.52\% |
| 04/09/1981 | 16.50\% | 11.78\% | 4.72\% |
| 04/09/1981 | 17.00\% | 11.78\% | 5.22\% |
| 04/10/1981 | 13.75\% | 11.80\% | 1.95\% |
| 04/13/1981 | 13.57\% | 11.82\% | 1.75\% |
| 04/15/1981 | 15.30\% | 11.85\% | 3.45\% |
| 04/16/1981 | 13.50\% | 11.87\% | 1.63\% |
| 04/17/1981 | 14.10\% | 11.87\% | 2.23\% |
| 04/21/1981 | 14.00\% | 11.90\% | 2.10\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 04/21/1981 | 16.80\% | 11.90\% | 4.90\% |
| 04/24/1981 | 16.00\% | 11.95\% | 4.05\% |
| 04/27/1981 | 12.50\% | 11.97\% | 0.53\% |
| 04/27/1981 | 13.61\% | 11.97\% | 1.64\% |
| 04/29/1981 | 13.65\% | 12.00\% | 1.65\% |
| 04/30/1981 | 13.50\% | 12.02\% | 1.48\% |
| 05/04/1981 | 16.22\% | 12.05\% | 4.17\% |
| 05/05/1981 | 14.40\% | 12.07\% | 2.33\% |
| 05/07/1981 | 16.25\% | 12.11\% | 4.14\% |
| 05/07/1981 | 16.27\% | 12.11\% | 4.16\% |
| 05/08/1981 | 13.00\% | 12.13\% | 0.87\% |
| 05/08/1981 | 16.00\% | 12.13\% | 3.87\% |
| 05/12/1981 | 13.50\% | 12.16\% | 1.34\% |
| 05/15/1981 | 15.75\% | 12.22\% | 3.53\% |
| 05/18/1981 | 14.88\% | 12.23\% | 2.65\% |
| 05/20/1981 | 16.00\% | 12.26\% | 3.74\% |
| 05/21/1981 | 14.00\% | 12.27\% | 1.73\% |
| 05/26/1981 | 14.90\% | 12.30\% | 2.60\% |
| 05/27/1981 | 15.00\% | 12.31\% | 2.69\% |
| 05/29/1981 | 15.50\% | 12.34\% | 3.16\% |
| 06/01/1981 | 16.50\% | 12.35\% | 4.15\% |
| 06/03/1981 | 14.67\% | 12.37\% | 2.30\% |
| 06/05/1981 | 13.00\% | 12.39\% | 0.61\% |
| 06/10/1981 | 16.75\% | 12.42\% | 4.33\% |
| 06/17/1981 | 14.40\% | 12.46\% | 1.94\% |
| 06/18/1981 | 16.33\% | 12.47\% | 3.86\% |
| 06/25/1981 | 14.75\% | 12.51\% | 2.24\% |
| 06/26/1981 | 16.00\% | 12.52\% | 3.48\% |
| 06/30/1981 | 15.25\% | 12.54\% | 2.71\% |
| 07/01/1981 | 15.50\% | 12.56\% | 2.94\% |
| 07/01/1981 | 17.50\% | 12.56\% | 4.94\% |
| 07/10/1981 | 16.00\% | 12.62\% | 3.38\% |
| 07/14/1981 | 16.90\% | 12.64\% | 4.26\% |
| 07/15/1981 | 16.00\% | 12.65\% | 3.35\% |
| 07/17/1981 | 15.00\% | 12.67\% | 2.33\% |
| 07/20/1981 | 15.00\% | 12.68\% | 2.32\% |
| 07/21/1981 | 14.00\% | 12.69\% | 1.31\% |
| 07/28/1981 | 13.48\% | 12.74\% | 0.74\% |
| 07/31/1981 | 13.50\% | 12.78\% | 0.72\% |
| 07/31/1981 | 15.00\% | 12.78\% | 2.22\% |
| 07/31/1981 | 16.00\% | 12.78\% | 3.22\% |
| 08/05/1981 | 15.71\% | 12.83\% | 2.88\% |
| 08/10/1981 | 14.50\% | 12.87\% | 1.63\% |
| 08/11/1981 | 15.00\% | 12.88\% | 2.12\% |
| 08/20/1981 | 13.50\% | 12.95\% | 0.55\% |
| 08/20/1981 | 16.50\% | 12.95\% | 3.55\% |
| 08/24/1981 | 15.00\% | 12.97\% | 2.03\% |
| 08/28/1981 | 15.00\% | 13.01\% | 1.99\% |
| 09/03/1981 | 14.50\% | 13.05\% | 1.45\% |
| 09/10/1981 | 14.50\% | 13.11\% | 1.39\% |
| 09/11/1981 | 16.00\% | 13.12\% | 2.88\% |
| 09/16/1981 | 16.00\% | 13.15\% | 2.85\% |
| 09/17/1981 | 16.50\% | 13.16\% | 3.34\% |
| 09/23/1981 | 15.85\% | 13.20\% | 2.65\% |
| 09/28/1981 | 15.50\% | 13.23\% | 2.27\% |
| 10/09/1981 | 15.75\% | 13.33\% | 2.42\% |
| 10/15/1981 | 16.25\% | 13.37\% | 2.88\% |
| 10/16/1981 | 15.50\% | 13.38\% | 2.12\% |
| 10/16/1981 | 16.50\% | 13.38\% | 3.12\% |
| 10/19/1981 | 14.25\% | 13.39\% | 0.86\% |
| 10/20/1981 | 15.25\% | 13.41\% | 1.84\% |
| 10/20/1981 | 17.00\% | 13.41\% | 3.59\% |
| 10/23/1981 | 16.00\% | 13.45\% | 2.55\% |
| 10/27/1981 | 10.00\% | 13.48\% | -3.48\% |
| 10/29/1981 | 14.75\% | 13.51\% | 1.24\% |
| 10/29/1981 | 16.50\% | 13.51\% | 2.99\% |
| 11/03/1981 | 15.17\% | 13.53\% | 1.64\% |
| 11/05/1981 | 16.60\% | 13.55\% | 3.05\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 11/06/1981 | 15.17\% | 13.56\% | 1.61\% |
| 11/24/1981 | 15.50\% | 13.61\% | 1.89\% |
| 11/25/1981 | 15.25\% | 13.61\% | 1.64\% |
| 11/25/1981 | 15.35\% | 13.61\% | 1.74\% |
| 11/25/1981 | 16.10\% | 13.61\% | 2.49\% |
| 11/25/1981 | 16.10\% | 13.61\% | 2.49\% |
| 12/01/1981 | 15.70\% | 13.61\% | 2.09\% |
| 12/01/1981 | 16.00\% | 13.61\% | 2.39\% |
| 12/01/1981 | 16.49\% | 13.61\% | 2.88\% |
| 12/01/1981 | 16.50\% | 13.61\% | 2.89\% |
| 12/04/1981 | 16.00\% | 13.61\% | 2.39\% |
| 12/11/1981 | 16.25\% | 13.63\% | 2.62\% |
| 12/14/1981 | 14.00\% | 13.63\% | 0.37\% |
| 12/15/1981 | 15.81\% | 13.63\% | 2.18\% |
| 12/15/1981 | 16.00\% | 13.63\% | 2.37\% |
| 12/16/1981 | 15.25\% | 13.63\% | 1.62\% |
| 12/17/1981 | 16.50\% | 13.63\% | 2.87\% |
| 12/18/1981 | 15.45\% | 13.63\% | 1.82\% |
| 12/30/1981 | 14.25\% | 13.67\% | 0.58\% |
| 12/30/1981 | 16.00\% | 13.67\% | 2.33\% |
| 12/30/1981 | 16.25\% | 13.67\% | 2.58\% |
| 12/31/1981 | 16.15\% | 13.67\% | 2.48\% |
| 01/04/1982 | 15.50\% | 13.67\% | 1.83\% |
| 01/11/1982 | 14.50\% | 13.72\% | 0.78\% |
| 01/11/1982 | 17.00\% | 13.72\% | 3.28\% |
| 01/13/1982 | 14.75\% | 13.74\% | 1.01\% |
| 01/14/1982 | 15.75\% | 13.75\% | 2.00\% |
| 01/15/1982 | 15.00\% | 13.76\% | 1.24\% |
| 01/15/1982 | 16.50\% | 13.76\% | 2.74\% |
| 01/22/1982 | 16.25\% | 13.79\% | 2.46\% |
| 01/27/1982 | 16.84\% | 13.81\% | 3.03\% |
| 01/28/1982 | 13.00\% | 13.81\% | -0.81\% |
| 01/29/1982 | 15.50\% | 13.82\% | 1.68\% |
| 02/01/1982 | 15.85\% | 13.82\% | 2.03\% |
| 02/03/1982 | 16.44\% | 13.84\% | 2.60\% |
| 02/08/1982 | 15.50\% | 13.86\% | 1.64\% |
| 02/11/1982 | 16.00\% | 13.88\% | 2.12\% |
| 02/11/1982 | 16.20\% | 13.88\% | 2.32\% |
| 02/17/1982 | 15.00\% | 13.89\% | 1.11\% |
| 02/19/1982 | 15.17\% | 13.89\% | 1.28\% |
| 02/26/1982 | 15.25\% | 13.89\% | 1.36\% |
| 03/01/1982 | 15.03\% | 13.89\% | 1.14\% |
| 03/01/1982 | 16.00\% | 13.89\% | 2.11\% |
| 03/03/1982 | 15.00\% | 13.88\% | 1.12\% |
| 03/08/1982 | 17.10\% | 13.88\% | 3.22\% |
| 03/12/1982 | 16.25\% | 13.88\% | 2.37\% |
| 03/17/1982 | 17.30\% | 13.88\% | 3.42\% |
| 03/22/1982 | 15.10\% | 13.89\% | 1.21\% |
| 03/27/1982 | 15.40\% | 13.89\% | 1.51\% |
| 03/30/1982 | 15.50\% | 13.90\% | 1.60\% |
| 03/31/1982 | 17.00\% | 13.91\% | 3.09\% |
| 04/01/1982 | 14.70\% | 13.91\% | 0.79\% |
| 04/01/1982 | 16.50\% | 13.91\% | 2.59\% |
| 04/02/1982 | 15.50\% | 13.91\% | 1.59\% |
| 04/05/1982 | 15.50\% | 13.92\% | 1.58\% |
| 04/08/1982 | 16.40\% | 13.93\% | 2.47\% |
| 04/13/1982 | 14.50\% | 13.94\% | 0.56\% |
| 04/23/1982 | 15.75\% | 13.94\% | 1.81\% |
| 04/27/1982 | 15.00\% | 13.94\% | 1.06\% |
| 04/28/1982 | 15.75\% | 13.94\% | 1.81\% |
| 04/30/1982 | 14.70\% | 13.94\% | 0.76\% |
| 04/30/1982 | 15.50\% | 13.94\% | 1.56\% |
| 05/03/1982 | 16.60\% | 13.94\% | 2.66\% |
| 05/04/1982 | 16.00\% | 13.94\% | 2.06\% |
| 05/14/1982 | 15.50\% | 13.92\% | 1.58\% |
| 05/18/1982 | 15.42\% | 13.92\% | 1.50\% |
| 05/19/1982 | 14.69\% | 13.92\% | 0.77\% |
| 05/20/1982 | 15.00\% | 13.91\% | 1.09\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 05/20/1982 | 15.10\% | 13.91\% | 1.19\% |
| 05/20/1982 | 15.50\% | 13.91\% | 1.59\% |
| 05/20/1982 | 16.30\% | 13.91\% | 2.39\% |
| 05/21/1982 | 17.75\% | 13.91\% | 3.84\% |
| 05/27/1982 | 15.00\% | 13.89\% | 1.11\% |
| 05/28/1982 | 15.50\% | 13.89\% | 1.61\% |
| 05/28/1982 | 17.00\% | 13.89\% | 3.11\% |
| 06/01/1982 | 13.75\% | 13.89\% | -0.14\% |
| 06/01/1982 | 16.60\% | 13.89\% | 2.71\% |
| 06/09/1982 | 17.86\% | 13.88\% | 3.98\% |
| 06/14/1982 | 15.75\% | 13.88\% | 1.87\% |
| 06/15/1982 | 14.85\% | 13.88\% | 0.97\% |
| 06/18/1982 | 15.50\% | 13.87\% | 1.63\% |
| 06/21/1982 | 14.90\% | 13.87\% | 1.03\% |
| 06/23/1982 | 16.00\% | 13.86\% | 2.14\% |
| 06/23/1982 | 16.17\% | 13.86\% | 2.31\% |
| 06/24/1982 | 14.85\% | 13.86\% | 0.99\% |
| 06/25/1982 | 14.70\% | 13.86\% | 0.84\% |
| 07/01/1982 | 16.00\% | 13.84\% | 2.16\% |
| 07/02/1982 | 15.62\% | 13.84\% | 1.78\% |
| 07/02/1982 | 17.00\% | 13.84\% | 3.16\% |
| 07/13/1982 | 14.00\% | 13.82\% | 0.18\% |
| 07/13/1982 | 16.80\% | 13.82\% | 2.98\% |
| 07/14/1982 | 15.76\% | 13.82\% | 1.94\% |
| 07/14/1982 | 16.02\% | 13.82\% | 2.20\% |
| 07/19/1982 | 16.50\% | 13.80\% | 2.70\% |
| 07/22/1982 | 14.50\% | 13.77\% | 0.73\% |
| 07/22/1982 | 17.00\% | 13.77\% | 3.23\% |
| 07/27/1982 | 16.75\% | 13.75\% | 3.00\% |
| 07/29/1982 | 16.50\% | 13.74\% | 2.76\% |
| 08/11/1982 | 17.50\% | 13.68\% | 3.82\% |
| 08/18/1982 | 17.07\% | 13.63\% | 3.44\% |
| 08/20/1982 | 15.73\% | 13.60\% | 2.13\% |
| 08/25/1982 | 16.00\% | 13.57\% | 2.43\% |
| 08/26/1982 | 15.50\% | 13.56\% | 1.94\% |
| 08/30/1982 | 15.00\% | 13.55\% | 1.45\% |
| 09/03/1982 | 16.20\% | 13.53\% | 2.67\% |
| 09/08/1982 | 15.00\% | 13.52\% | 1.48\% |
| 09/15/1982 | 13.08\% | 13.50\% | -0.42\% |
| 09/15/1982 | 16.25\% | 13.50\% | 2.75\% |
| 09/16/1982 | 16.00\% | 13.50\% | 2.50\% |
| 09/17/1982 | 15.25\% | 13.50\% | 1.75\% |
| 09/23/1982 | 17.17\% | 13.47\% | 3.70\% |
| 09/24/1982 | 14.50\% | 13.46\% | 1.04\% |
| 09/27/1982 | 15.25\% | 13.46\% | 1.79\% |
| 10/01/1982 | 15.50\% | 13.42\% | 2.08\% |
| 10/15/1982 | 15.90\% | 13.32\% | 2.58\% |
| 10/22/1982 | 15.75\% | 13.24\% | 2.51\% |
| 10/22/1982 | 17.15\% | 13.24\% | 3.91\% |
| 10/29/1982 | 15.54\% | 13.16\% | 2.38\% |
| 11/01/1982 | 15.50\% | 13.15\% | 2.35\% |
| 11/03/1982 | 17.20\% | 13.13\% | 4.07\% |
| 11/04/1982 | 16.25\% | 13.11\% | 3.14\% |
| 11/05/1982 | 16.20\% | 13.09\% | 3.11\% |
| 11/09/1982 | 16.00\% | 13.05\% | 2.95\% |
| 11/23/1982 | 15.50\% | 12.89\% | 2.61\% |
| 11/23/1982 | 15.85\% | 12.89\% | 2.96\% |
| 11/30/1982 | 16.50\% | 12.81\% | 3.69\% |
| 12/01/1982 | 17.04\% | 12.79\% | 4.25\% |
| 12/06/1982 | 15.00\% | 12.73\% | 2.27\% |
| 12/06/1982 | 16.35\% | 12.73\% | 3.62\% |
| 12/10/1982 | 15.50\% | 12.66\% | 2.84\% |
| 12/13/1982 | 16.00\% | 12.65\% | 3.35\% |
| 12/14/1982 | 15.30\% | 12.63\% | 2.67\% |
| 12/14/1982 | 16.40\% | 12.63\% | 3.77\% |
| 12/20/1982 | 16.00\% | 12.57\% | 3.43\% |
| 12/21/1982 | 14.75\% | 12.56\% | 2.19\% |
| 12/21/1982 | 15.85\% | 12.56\% | 3.29\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 12/22/1982 | 16.25\% | 12.54\% | 3.71\% |
| 12/22/1982 | 16.58\% | 12.54\% | 4.04\% |
| 12/22/1982 | 16.75\% | 12.54\% | 4.21\% |
| 12/29/1982 | 14.90\% | 12.48\% | 2.42\% |
| 12/29/1982 | 16.25\% | 12.48\% | 3.77\% |
| 12/30/1982 | 16.00\% | 12.47\% | 3.53\% |
| 12/30/1982 | 16.35\% | 12.47\% | 3.88\% |
| 12/30/1982 | 16.77\% | 12.47\% | 4.30\% |
| 01/05/1983 | 17.33\% | 12.40\% | 4.93\% |
| 01/11/1983 | 15.90\% | 12.34\% | 3.56\% |
| 01/12/1983 | 14.63\% | 12.33\% | 2.30\% |
| 01/12/1983 | 15.50\% | 12.33\% | 3.17\% |
| 01/20/1983 | 17.75\% | 12.24\% | 5.51\% |
| 01/21/1983 | 15.00\% | 12.22\% | 2.78\% |
| 01/24/1983 | 14.50\% | 12.21\% | 2.29\% |
| 01/24/1983 | 15.50\% | 12.21\% | 3.29\% |
| 01/25/1983 | 15.85\% | 12.19\% | 3.66\% |
| 01/27/1983 | 16.14\% | 12.17\% | 3.97\% |
| 02/01/1983 | 18.50\% | 12.13\% | 6.37\% |
| 02/04/1983 | 14.00\% | 12.10\% | 1.90\% |
| 02/10/1983 | 15.00\% | 12.06\% | 2.94\% |
| 02/21/1983 | 15.50\% | 11.98\% | 3.52\% |
| 02/22/1983 | 15.50\% | 11.97\% | 3.53\% |
| 02/23/1983 | 15.10\% | 11.96\% | 3.14\% |
| 02/23/1983 | 16.00\% | 11.96\% | 4.04\% |
| 03/02/1983 | 15.25\% | 11.89\% | 3.36\% |
| 03/09/1983 | 15.20\% | 11.82\% | 3.38\% |
| 03/15/1983 | 13.00\% | 11.77\% | 1.23\% |
| 03/18/1983 | 15.25\% | 11.73\% | 3.52\% |
| 03/23/1983 | 15.40\% | 11.69\% | 3.71\% |
| 03/24/1983 | 15.00\% | 11.67\% | 3.33\% |
| 03/29/1983 | 15.50\% | 11.63\% | 3.87\% |
| 03/30/1983 | 16.71\% | 11.61\% | 5.10\% |
| 03/31/1983 | 15.00\% | 11.59\% | 3.41\% |
| 04/04/1983 | 15.20\% | 11.58\% | 3.62\% |
| 04/08/1983 | 15.50\% | 11.51\% | 3.99\% |
| 04/11/1983 | 14.81\% | 11.49\% | 3.32\% |
| 04/19/1983 | 14.50\% | 11.38\% | 3.12\% |
| 04/20/1983 | 16.00\% | 11.36\% | 4.64\% |
| 04/29/1983 | 16.00\% | 11.24\% | 4.76\% |
| 05/01/1983 | 14.50\% | 11.24\% | 3.26\% |
| 05/09/1983 | 15.50\% | 11.15\% | 4.35\% |
| 05/11/1983 | 16.46\% | 11.12\% | 5.34\% |
| 05/12/1983 | 14.14\% | 11.11\% | 3.03\% |
| 05/18/1983 | 15.00\% | 11.05\% | 3.95\% |
| 05/23/1983 | 14.90\% | 11.01\% | 3.89\% |
| 05/23/1983 | 15.50\% | 11.01\% | 4.49\% |
| 05/25/1983 | 15.50\% | 10.98\% | 4.52\% |
| 05/27/1983 | 15.00\% | 10.96\% | 4.04\% |
| 05/31/1983 | 14.00\% | 10.95\% | 3.05\% |
| 05/31/1983 | 15.50\% | 10.95\% | 4.55\% |
| 06/02/1983 | 14.50\% | 10.93\% | 3.57\% |
| 06/17/1983 | 15.03\% | 10.84\% | 4.19\% |
| 07/01/1983 | 14.80\% | 10.78\% | 4.02\% |
| 07/01/1983 | 14.90\% | 10.78\% | 4.12\% |
| 07/08/1983 | 16.25\% | 10.76\% | 5.49\% |
| 07/13/1983 | 13.20\% | 10.75\% | 2.45\% |
| 07/19/1983 | 15.00\% | 10.74\% | 4.26\% |
| 07/19/1983 | 15.10\% | 10.74\% | 4.36\% |
| 07/25/1983 | 16.25\% | 10.73\% | 5.52\% |
| 07/28/1983 | 15.90\% | 10.74\% | 5.16\% |
| 08/03/1983 | 16.34\% | 10.75\% | 5.59\% |
| 08/03/1983 | 16.50\% | 10.75\% | 5.75\% |
| 08/19/1983 | 15.00\% | 10.80\% | 4.20\% |
| 08/22/1983 | 15.50\% | 10.80\% | 4.70\% |
| 08/22/1983 | 16.40\% | 10.80\% | 5.60\% |
| 08/31/1983 | 14.75\% | 10.84\% | 3.91\% |
| 09/07/1983 | 15.00\% | 10.86\% | 4.14\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 09/14/1983 | 15.78\% | 10.89\% | 4.89\% |
| 09/16/1983 | 15.00\% | 10.90\% | 4.10\% |
| 09/19/1983 | 14.50\% | 10.91\% | 3.59\% |
| 09/20/1983 | 16.50\% | 10.91\% | 5.59\% |
| 09/28/1983 | 14.50\% | 10.94\% | 3.56\% |
| 09/29/1983 | 15.50\% | 10.95\% | 4.55\% |
| 09/30/1983 | 15.25\% | 10.95\% | 4.30\% |
| 09/30/1983 | 16.15\% | 10.95\% | 5.20\% |
| 10/04/1983 | 14.80\% | 10.96\% | 3.84\% |
| 10/07/1983 | 16.00\% | 10.97\% | 5.03\% |
| 10/13/1983 | 15.52\% | 10.99\% | 4.53\% |
| 10/17/1983 | 15.50\% | 11.00\% | 4.50\% |
| 10/18/1983 | 14.50\% | 11.00\% | 3.50\% |
| 10/19/1983 | 16.25\% | 11.01\% | 5.24\% |
| 10/19/1983 | 16.50\% | 11.01\% | 5.49\% |
| 10/26/1983 | 15.00\% | 11.04\% | 3.96\% |
| 10/27/1983 | 15.20\% | 11.04\% | 4.16\% |
| 11/01/1983 | 16.00\% | 11.06\% | 4.94\% |
| 11/09/1983 | 14.90\% | 11.09\% | 3.81\% |
| 11/10/1983 | 14.35\% | 11.10\% | 3.25\% |
| 11/23/1983 | 16.00\% | 11.13\% | 4.87\% |
| 11/23/1983 | 16.15\% | 11.13\% | 5.02\% |
| 11/30/1983 | 15.00\% | 11.14\% | 3.86\% |
| 12/05/1983 | 15.25\% | 11.15\% | 4.10\% |
| 12/06/1983 | 15.07\% | 11.15\% | 3.92\% |
| 12/08/1983 | 15.90\% | 11.16\% | 4.74\% |
| 12/09/1983 | 14.75\% | 11.17\% | 3.58\% |
| 12/12/1983 | 14.50\% | 11.17\% | 3.33\% |
| 12/15/1983 | 15.56\% | 11.19\% | 4.37\% |
| 12/19/1983 | 14.80\% | 11.21\% | 3.59\% |
| 12/20/1983 | 14.69\% | 11.22\% | 3.47\% |
| 12/20/1983 | 16.00\% | 11.22\% | 4.78\% |
| 12/20/1983 | 16.25\% | 11.22\% | 5.03\% |
| 12/22/1983 | 14.75\% | 11.23\% | 3.52\% |
| 12/22/1983 | 15.75\% | 11.23\% | 4.52\% |
| 01/03/1984 | 14.75\% | 11.27\% | 3.48\% |
| 01/10/1984 | 15.90\% | 11.30\% | 4.60\% |
| 01/12/1984 | 15.60\% | 11.31\% | 4.29\% |
| 01/18/1984 | 13.75\% | 11.33\% | 2.42\% |
| 01/19/1984 | 15.90\% | 11.33\% | 4.57\% |
| 01/30/1984 | 16.10\% | 11.37\% | 4.73\% |
| 01/31/1984 | 15.25\% | 11.37\% | 3.88\% |
| 02/01/1984 | 14.80\% | 11.38\% | 3.42\% |
| 02/06/1984 | 13.75\% | 11.40\% | 2.35\% |
| 02/06/1984 | 14.75\% | 11.40\% | 3.35\% |
| 02/09/1984 | 15.25\% | 11.42\% | 3.83\% |
| 02/15/1984 | 15.70\% | 11.44\% | 4.26\% |
| 02/20/1984 | 15.00\% | 11.46\% | 3.54\% |
| 02/20/1984 | 15.00\% | 11.46\% | 3.54\% |
| 02/22/1984 | 14.75\% | 11.47\% | 3.28\% |
| 02/28/1984 | 14.50\% | 11.51\% | 2.99\% |
| 03/02/1984 | 14.25\% | 11.54\% | 2.71\% |
| 03/20/1984 | 16.00\% | 11.64\% | 4.36\% |
| 03/23/1984 | 15.50\% | 11.67\% | 3.83\% |
| 03/26/1984 | 14.71\% | 11.68\% | 3.03\% |
| 04/02/1984 | 15.50\% | 11.71\% | 3.79\% |
| 04/06/1984 | 14.74\% | 11.75\% | 2.99\% |
| 04/11/1984 | 15.72\% | 11.78\% | 3.94\% |
| 04/17/1984 | 15.00\% | 11.81\% | 3.19\% |
| 04/18/1984 | 16.20\% | 11.82\% | 4.38\% |
| 04/25/1984 | 14.64\% | 11.85\% | 2.79\% |
| 04/30/1984 | 14.40\% | 11.87\% | 2.53\% |
| 05/16/1984 | 14.69\% | 11.98\% | 2.71\% |
| 05/16/1984 | 15.00\% | 11.98\% | 3.02\% |
| 05/22/1984 | 14.40\% | 12.02\% | 2.38\% |
| 05/29/1984 | 15.10\% | 12.06\% | 3.04\% |
| 06/13/1984 | 15.25\% | 12.15\% | 3.10\% |
| 06/15/1984 | 15.60\% | 12.17\% | 3.43\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 06/22/1984 | 16.25\% | 12.21\% | 4.04\% |
| 06/29/1984 | 15.25\% | 12.26\% | 2.99\% |
| 07/02/1984 | 13.35\% | 12.27\% | 1.08\% |
| 07/10/1984 | 16.00\% | 12.31\% | 3.69\% |
| 07/12/1984 | 16.50\% | 12.32\% | 4.18\% |
| 07/13/1984 | 16.25\% | 12.33\% | 3.92\% |
| 07/17/1984 | 14.14\% | 12.35\% | 1.79\% |
| 07/18/1984 | 15.30\% | 12.36\% | 2.94\% |
| 07/18/1984 | 15.50\% | 12.36\% | 3.14\% |
| 07/19/1984 | 14.30\% | 12.37\% | 1.93\% |
| 07/24/1984 | 16.79\% | 12.39\% | 4.40\% |
| 07/31/1984 | 16.00\% | 12.43\% | 3.57\% |
| 08/03/1984 | 14.25\% | 12.44\% | 1.81\% |
| 08/17/1984 | 14.30\% | 12.49\% | 1.81\% |
| 08/20/1984 | 15.00\% | 12.49\% | 2.51\% |
| 08/27/1984 | 16.30\% | 12.51\% | 3.79\% |
| 08/31/1984 | 15.55\% | 12.52\% | 3.03\% |
| 09/06/1984 | 16.00\% | 12.53\% | 3.47\% |
| 09/10/1984 | 14.75\% | 12.54\% | 2.21\% |
| 09/13/1984 | 15.00\% | 12.55\% | 2.45\% |
| 09/17/1984 | 17.38\% | 12.56\% | 4.82\% |
| 09/26/1984 | 14.50\% | 12.57\% | 1.93\% |
| 09/28/1984 | 15.00\% | 12.57\% | 2.43\% |
| 09/28/1984 | 16.25\% | 12.57\% | 3.68\% |
| 10/09/1984 | 14.75\% | 12.58\% | 2.17\% |
| 10/12/1984 | 15.60\% | 12.59\% | 3.01\% |
| 10/22/1984 | 15.00\% | 12.59\% | 2.41\% |
| 10/26/1984 | 16.40\% | 12.58\% | 3.82\% |
| 10/31/1984 | 16.25\% | 12.58\% | 3.67\% |
| 11/07/1984 | 15.60\% | 12.58\% | 3.02\% |
| 11/09/1984 | 16.00\% | 12.58\% | 3.42\% |
| 11/14/1984 | 15.75\% | 12.58\% | 3.17\% |
| 11/20/1984 | 15.25\% | 12.58\% | 2.67\% |
| 11/20/1984 | 15.92\% | 12.58\% | 3.34\% |
| 11/23/1984 | 15.00\% | 12.58\% | 2.42\% |
| 11/28/1984 | 16.15\% | 12.57\% | 3.58\% |
| 12/03/1984 | 15.80\% | 12.56\% | 3.24\% |
| 12/04/1984 | 16.50\% | 12.56\% | 3.94\% |
| 12/18/1984 | 16.40\% | 12.53\% | 3.87\% |
| 12/19/1984 | 14.75\% | 12.53\% | 2.22\% |
| 12/19/1984 | 15.00\% | 12.53\% | 2.47\% |
| 12/20/1984 | 16.00\% | 12.53\% | 3.47\% |
| 12/28/1984 | 16.00\% | 12.50\% | 3.50\% |
| 01/03/1985 | 14.75\% | 12.49\% | 2.26\% |
| 01/10/1985 | 15.75\% | 12.47\% | 3.28\% |
| 01/11/1985 | 16.30\% | 12.46\% | 3.84\% |
| 01/23/1985 | 15.80\% | 12.43\% | 3.37\% |
| 01/24/1985 | 15.82\% | 12.43\% | 3.39\% |
| 01/25/1985 | 16.75\% | 12.42\% | 4.33\% |
| 01/30/1985 | 14.90\% | 12.40\% | 2.50\% |
| 01/31/1985 | 14.75\% | 12.39\% | 2.36\% |
| 02/08/1985 | 14.47\% | 12.35\% | 2.12\% |
| 03/01/1985 | 13.84\% | 12.31\% | 1.53\% |
| 03/08/1985 | 16.85\% | 12.28\% | 4.57\% |
| 03/14/1985 | 15.50\% | 12.25\% | 3.25\% |
| 03/15/1985 | 15.62\% | 12.25\% | 3.37\% |
| 03/29/1985 | 15.62\% | 12.17\% | 3.45\% |
| 04/03/1985 | 14.60\% | 12.14\% | 2.46\% |
| 04/09/1985 | 15.50\% | 12.11\% | 3.39\% |
| 04/16/1985 | 15.70\% | 12.06\% | 3.64\% |
| 04/22/1985 | 14.00\% | 12.02\% | 1.98\% |
| 04/26/1985 | 15.50\% | 11.98\% | 3.52\% |
| 04/29/1985 | 15.00\% | 11.97\% | 3.03\% |
| 05/02/1985 | 14.68\% | 11.94\% | 2.74\% |
| 05/08/1985 | 15.62\% | 11.89\% | 3.73\% |
| 05/10/1985 | 16.50\% | 11.87\% | 4.63\% |
| 05/29/1985 | 14.61\% | 11.73\% | 2.88\% |
| 05/31/1985 | 16.00\% | 11.71\% | 4.29\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 06/14/1985 | 15.50\% | 11.61\% | 3.89\% |
| 07/09/1985 | 15.00\% | 11.45\% | 3.55\% |
| 07/16/1985 | 14.50\% | 11.39\% | 3.11\% |
| 07/26/1985 | 14.50\% | 11.33\% | 3.17\% |
| 08/02/1985 | 14.80\% | 11.29\% | 3.51\% |
| 08/07/1985 | 15.00\% | 11.27\% | 3.73\% |
| 08/28/1985 | 14.25\% | 11.15\% | 3.10\% |
| 08/28/1985 | 15.50\% | 11.15\% | 4.35\% |
| 08/29/1985 | 14.50\% | 11.15\% | 3.35\% |
| 09/09/1985 | 14.60\% | 11.11\% | 3.49\% |
| 09/09/1985 | 14.90\% | 11.11\% | 3.79\% |
| 09/17/1985 | 14.90\% | 11.08\% | 3.82\% |
| 09/23/1985 | 15.00\% | 11.06\% | 3.94\% |
| 09/27/1985 | 15.50\% | 11.05\% | 4.45\% |
| 09/27/1985 | 15.80\% | 11.05\% | 4.75\% |
| 10/02/1985 | 14.00\% | 11.03\% | 2.97\% |
| 10/02/1985 | 14.75\% | 11.03\% | 3.72\% |
| 10/03/1985 | 15.25\% | 11.03\% | 4.22\% |
| 10/24/1985 | 15.40\% | 10.96\% | 4.44\% |
| 10/24/1985 | 15.82\% | 10.96\% | 4.86\% |
| 10/24/1985 | 15.85\% | 10.96\% | 4.89\% |
| 10/28/1985 | 16.00\% | 10.95\% | 5.05\% |
| 10/29/1985 | 16.65\% | 10.94\% | 5.71\% |
| 10/31/1985 | 15.06\% | 10.93\% | 4.13\% |
| 11/04/1985 | 14.50\% | 10.92\% | 3.58\% |
| 11/07/1985 | 15.50\% | 10.90\% | 4.60\% |
| 11/08/1985 | 14.30\% | 10.89\% | 3.41\% |
| 12/12/1985 | 14.75\% | 10.73\% | 4.02\% |
| 12/18/1985 | 15.00\% | 10.69\% | 4.31\% |
| 12/20/1985 | 14.50\% | 10.67\% | 3.83\% |
| 12/20/1985 | 14.50\% | 10.67\% | 3.83\% |
| 12/20/1985 | 15.00\% | 10.67\% | 4.33\% |
| 01/24/1986 | 15.40\% | 10.41\% | 4.99\% |
| 01/31/1986 | 15.00\% | 10.35\% | 4.65\% |
| 02/05/1986 | 15.00\% | 10.32\% | 4.68\% |
| 02/05/1986 | 15.75\% | 10.32\% | 5.43\% |
| 02/10/1986 | 13.30\% | 10.29\% | 3.01\% |
| 02/11/1986 | 12.50\% | 10.28\% | 2.22\% |
| 02/14/1986 | 14.40\% | 10.24\% | 4.16\% |
| 02/18/1986 | 16.00\% | 10.23\% | 5.77\% |
| 02/24/1986 | 14.50\% | 10.18\% | 4.32\% |
| 02/26/1986 | 14.00\% | 10.15\% | 3.85\% |
| 03/05/1986 | 14.90\% | 10.08\% | 4.82\% |
| 03/11/1986 | 14.50\% | 10.02\% | 4.48\% |
| 03/12/1986 | 13.50\% | 10.00\% | 3.50\% |
| 03/27/1986 | 14.10\% | 9.86\% | 4.24\% |
| 03/31/1986 | 13.50\% | 9.84\% | 3.66\% |
| 04/01/1986 | 14.00\% | 9.83\% | 4.17\% |
| 04/02/1986 | 15.50\% | 9.81\% | 5.69\% |
| 04/04/1986 | 15.00\% | 9.78\% | 5.22\% |
| 04/14/1986 | 13.40\% | 9.69\% | 3.71\% |
| 04/23/1986 | 15.00\% | 9.57\% | 5.43\% |
| 05/16/1986 | 14.50\% | 9.32\% | 5.18\% |
| 05/16/1986 | 14.50\% | 9.32\% | 5.18\% |
| 05/29/1986 | 13.90\% | 9.19\% | 4.71\% |
| 05/30/1986 | 15.10\% | 9.18\% | 5.92\% |
| 06/02/1986 | 12.81\% | 9.17\% | 3.64\% |
| 06/11/1986 | 14.00\% | 9.07\% | 4.93\% |
| 06/24/1986 | 16.63\% | 8.94\% | 7.69\% |
| 06/26/1986 | 12.00\% | 8.91\% | 3.09\% |
| 06/26/1986 | 14.75\% | 8.91\% | 5.84\% |
| 06/30/1986 | 13.00\% | 8.87\% | 4.13\% |
| 07/10/1986 | 14.34\% | 8.75\% | 5.59\% |
| 07/11/1986 | 12.75\% | 8.73\% | 4.02\% |
| 07/14/1986 | 12.60\% | 8.71\% | 3.89\% |
| 07/17/1986 | 12.40\% | 8.66\% | 3.74\% |
| 07/25/1986 | 14.25\% | 8.57\% | 5.68\% |
| 08/06/1986 | 13.50\% | 8.44\% | 5.06\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 08/14/1986 | 13.50\% | 8.35\% | 5.15\% |
| 09/16/1986 | 12.75\% | 8.06\% | 4.69\% |
| 09/19/1986 | 13.25\% | 8.03\% | 5.22\% |
| 10/01/1986 | 14.00\% | 7.95\% | 6.05\% |
| 10/03/1986 | 13.40\% | 7.93\% | 5.47\% |
| 10/31/1986 | 13.50\% | 7.77\% | 5.73\% |
| 11/05/1986 | 13.00\% | 7.75\% | 5.25\% |
| 12/03/1986 | 12.90\% | 7.58\% | 5.32\% |
| 12/04/1986 | 14.44\% | 7.58\% | 6.86\% |
| 12/16/1986 | 13.60\% | 7.52\% | 6.08\% |
| 12/22/1986 | 13.80\% | 7.51\% | 6.29\% |
| 12/30/1986 | 13.00\% | 7.49\% | 5.51\% |
| 01/02/1987 | 13.00\% | 7.49\% | 5.51\% |
| 01/12/1987 | 12.40\% | 7.47\% | 4.93\% |
| 01/27/1987 | 12.71\% | 7.46\% | 5.25\% |
| 03/02/1987 | 12.47\% | 7.47\% | 5.00\% |
| 03/03/1987 | 13.60\% | 7.47\% | 6.13\% |
| 03/04/1987 | 12.38\% | 7.47\% | 4.91\% |
| 03/10/1987 | 13.50\% | 7.47\% | 6.03\% |
| 03/13/1987 | 13.00\% | 7.47\% | 5.53\% |
| 03/31/1987 | 13.00\% | 7.46\% | 5.54\% |
| 04/06/1987 | 13.00\% | 7.47\% | 5.53\% |
| 04/14/1987 | 12.50\% | 7.49\% | 5.01\% |
| 04/16/1987 | 14.50\% | 7.50\% | 7.00\% |
| 04/27/1987 | 12.00\% | 7.54\% | 4.46\% |
| 05/05/1987 | 12.85\% | 7.58\% | 5.27\% |
| 05/12/1987 | 12.65\% | 7.62\% | 5.03\% |
| 05/28/1987 | 13.50\% | 7.70\% | 5.80\% |
| 06/15/1987 | 13.20\% | 7.78\% | 5.42\% |
| 06/29/1987 | 15.00\% | 7.83\% | 7.17\% |
| 06/30/1987 | 12.50\% | 7.84\% | 4.66\% |
| 07/08/1987 | 12.00\% | 7.86\% | 4.14\% |
| 07/10/1987 | 12.90\% | 7.86\% | 5.04\% |
| 07/15/1987 | 13.50\% | 7.88\% | 5.62\% |
| 07/16/1987 | 13.50\% | 7.88\% | 5.62\% |
| 07/16/1987 | 15.00\% | 7.88\% | 7.12\% |
| 07/27/1987 | 13.00\% | 7.92\% | 5.08\% |
| 07/27/1987 | 13.40\% | 7.92\% | 5.48\% |
| 07/27/1987 | 13.50\% | 7.92\% | 5.58\% |
| 07/31/1987 | 12.98\% | 7.95\% | 5.03\% |
| 08/26/1987 | 12.63\% | 8.06\% | 4.57\% |
| 08/26/1987 | 12.75\% | 8.06\% | 4.69\% |
| 08/27/1987 | 13.25\% | 8.06\% | 5.19\% |
| 09/09/1987 | 13.00\% | 8.14\% | 4.86\% |
| 09/30/1987 | 12.75\% | 8.31\% | 4.44\% |
| 09/30/1987 | 13.00\% | 8.31\% | 4.69\% |
| 10/02/1987 | 11.50\% | 8.33\% | 3.17\% |
| 10/15/1987 | 13.00\% | 8.43\% | 4.57\% |
| 11/02/1987 | 13.00\% | 8.55\% | 4.45\% |
| 11/19/1987 | 13.00\% | 8.64\% | 4.36\% |
| 11/30/1987 | 12.00\% | 8.68\% | 3.32\% |
| 12/03/1987 | 14.20\% | 8.70\% | 5.50\% |
| 12/15/1987 | 13.25\% | 8.77\% | 4.48\% |
| 12/16/1987 | 13.50\% | 8.78\% | 4.72\% |
| 12/16/1987 | 13.72\% | 8.78\% | 4.94\% |
| 12/17/1987 | 11.75\% | 8.79\% | 2.96\% |
| 12/18/1987 | 13.50\% | 8.80\% | 4.70\% |
| 12/21/1987 | 12.01\% | 8.81\% | 3.20\% |
| 12/22/1987 | 12.00\% | 8.81\% | 3.19\% |
| 12/22/1987 | 12.00\% | 8.81\% | 3.19\% |
| 12/22/1987 | 12.75\% | 8.81\% | 3.94\% |
| 12/22/1987 | 13.00\% | 8.81\% | 4.19\% |
| 01/20/1988 | 13.80\% | 8.94\% | 4.86\% |
| 01/26/1988 | 13.90\% | 8.95\% | 4.95\% |
| 01/29/1988 | 13.20\% | 8.96\% | 4.24\% |
| 02/04/1988 | 12.60\% | 8.96\% | 3.64\% |
| 03/01/1988 | 11.56\% | 8.94\% | 2.62\% |
| 03/23/1988 | 12.87\% | 8.92\% | 3.95\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 03/24/1988 | 11.24\% | 8.92\% | 2.32\% |
| 03/30/1988 | 12.72\% | 8.92\% | 3.80\% |
| 04/01/1988 | 12.50\% | 8.92\% | 3.58\% |
| 04/07/1988 | 13.25\% | 8.93\% | 4.32\% |
| 04/25/1988 | 10.96\% | 8.96\% | 2.00\% |
| 05/03/1988 | 12.91\% | 8.97\% | 3.94\% |
| 05/11/1988 | 13.50\% | 8.99\% | 4.51\% |
| 05/16/1988 | 13.00\% | 8.99\% | 4.01\% |
| 06/30/1988 | 12.75\% | 9.00\% | 3.75\% |
| 07/01/1988 | 12.75\% | 8.99\% | 3.76\% |
| 07/20/1988 | 13.40\% | 8.96\% | 4.44\% |
| 08/05/1988 | 12.75\% | 8.92\% | 3.83\% |
| 08/23/1988 | 11.70\% | 8.93\% | 2.77\% |
| 08/29/1988 | 12.75\% | 8.94\% | 3.81\% |
| 08/30/1988 | 13.50\% | 8.94\% | 4.56\% |
| 09/08/1988 | 12.60\% | 8.95\% | 3.65\% |
| 10/13/1988 | 13.10\% | 8.93\% | 4.17\% |
| 12/19/1988 | 13.00\% | 9.02\% | 3.98\% |
| 12/20/1988 | 12.25\% | 9.02\% | 3.23\% |
| 12/20/1988 | 13.00\% | 9.02\% | 3.98\% |
| 12/21/1988 | 12.90\% | 9.02\% | 3.88\% |
| 12/27/1988 | 13.00\% | 9.03\% | 3.97\% |
| 12/28/1988 | 13.10\% | 9.03\% | 4.07\% |
| 12/30/1988 | 13.40\% | 9.04\% | 4.36\% |
| 01/27/1989 | 13.00\% | 9.05\% | 3.95\% |
| 01/31/1989 | 13.00\% | 9.05\% | 3.95\% |
| 02/17/1989 | 13.00\% | 9.05\% | 3.95\% |
| 02/20/1989 | 12.40\% | 9.05\% | 3.35\% |
| 03/01/1989 | 12.76\% | 9.05\% | 3.71\% |
| 03/08/1989 | 13.00\% | 9.05\% | 3.95\% |
| 03/30/1989 | 14.00\% | 9.05\% | 4.95\% |
| 04/05/1989 | 14.20\% | 9.05\% | 5.15\% |
| 04/18/1989 | 13.00\% | 9.05\% | 3.95\% |
| 05/05/1989 | 12.40\% | 9.05\% | 3.35\% |
| 06/02/1989 | 13.20\% | 9.00\% | 4.20\% |
| 06/08/1989 | 13.50\% | 8.98\% | 4.52\% |
| 06/27/1989 | 13.25\% | 8.91\% | 4.34\% |
| 06/30/1989 | 13.00\% | 8.90\% | 4.10\% |
| 08/14/1989 | 12.50\% | 8.77\% | 3.73\% |
| 09/28/1989 | 12.25\% | 8.63\% | 3.62\% |
| 10/24/1989 | 12.50\% | 8.54\% | 3.96\% |
| 11/09/1989 | 13.00\% | 8.49\% | 4.51\% |
| 12/15/1989 | 13.00\% | 8.34\% | 4.66\% |
| 12/20/1989 | 12.90\% | 8.32\% | 4.58\% |
| 12/21/1989 | 12.90\% | 8.31\% | 4.59\% |
| 12/27/1989 | 12.50\% | 8.29\% | 4.21\% |
| 12/27/1989 | 13.00\% | 8.29\% | 4.71\% |
| 01/10/1990 | 12.80\% | 8.24\% | 4.56\% |
| 01/11/1990 | 12.90\% | 8.24\% | 4.66\% |
| 01/17/1990 | 12.80\% | 8.22\% | 4.58\% |
| 01/26/1990 | 12.00\% | 8.20\% | 3.80\% |
| 02/09/1990 | 12.10\% | 8.17\% | 3.93\% |
| 02/24/1990 | 12.86\% | 8.15\% | 4.71\% |
| 03/30/1990 | 12.90\% | 8.16\% | 4.74\% |
| 04/04/1990 | 15.76\% | 8.17\% | 7.59\% |
| 04/12/1990 | 12.52\% | 8.18\% | 4.34\% |
| 04/19/1990 | 12.75\% | 8.20\% | 4.55\% |
| 05/21/1990 | 12.10\% | 8.28\% | 3.82\% |
| 05/29/1990 | 12.40\% | 8.30\% | 4.10\% |
| 05/31/1990 | 12.00\% | 8.30\% | 3.70\% |
| 06/04/1990 | 12.90\% | 8.30\% | 4.60\% |
| 06/06/1990 | 12.25\% | 8.31\% | 3.94\% |
| 06/15/1990 | 13.20\% | 8.32\% | 4.88\% |
| 06/20/1990 | 12.92\% | 8.32\% | 4.60\% |
| 06/27/1990 | 12.90\% | 8.33\% | 4.57\% |
| 06/29/1990 | 12.50\% | 8.33\% | 4.17\% |
| 07/06/1990 | 12.10\% | 8.34\% | 3.76\% |
| 07/06/1990 | 12.35\% | 8.34\% | 4.01\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 08/10/1990 | 12.55\% | 8.41\% | 4.14\% |
| 08/16/1990 | 13.21\% | 8.43\% | 4.78\% |
| 08/22/1990 | 13.10\% | 8.45\% | 4.65\% |
| 08/24/1990 | 13.00\% | 8.46\% | 4.54\% |
| 09/26/1990 | 11.45\% | 8.59\% | 2.86\% |
| 10/02/1990 | 13.00\% | 8.61\% | 4.39\% |
| 10/05/1990 | 12.84\% | 8.62\% | 4.22\% |
| 10/19/1990 | 13.00\% | 8.67\% | 4.33\% |
| 10/25/1990 | 12.30\% | 8.68\% | 3.62\% |
| 11/21/1990 | 12.70\% | 8.69\% | 4.01\% |
| 12/13/1990 | 12.30\% | 8.67\% | 3.63\% |
| 12/17/1990 | 12.87\% | 8.67\% | 4.20\% |
| 12/18/1990 | 13.10\% | 8.67\% | 4.43\% |
| 12/19/1990 | 12.00\% | 8.66\% | 3.34\% |
| 12/20/1990 | 12.75\% | 8.66\% | 4.09\% |
| 12/21/1990 | 12.50\% | 8.66\% | 3.84\% |
| 12/27/1990 | 12.79\% | 8.66\% | 4.13\% |
| 01/02/1991 | 13.10\% | 8.65\% | 4.45\% |
| 01/04/1991 | 12.50\% | 8.65\% | 3.85\% |
| 01/15/1991 | 12.75\% | 8.64\% | 4.11\% |
| 01/25/1991 | 11.70\% | 8.63\% | 3.07\% |
| 02/04/1991 | 12.50\% | 8.60\% | 3.90\% |
| 02/07/1991 | 12.50\% | 8.59\% | 3.91\% |
| 02/12/1991 | 13.00\% | 8.58\% | 4.43\% |
| 02/14/1991 | 12.72\% | 8.57\% | 4.15\% |
| 02/22/1991 | 12.80\% | 8.55\% | 4.25\% |
| 03/06/1991 | 13.10\% | 8.53\% | 4.57\% |
| 03/08/1991 | 12.30\% | 8.52\% | 3.78\% |
| 03/08/1991 | 13.00\% | 8.52\% | 4.48\% |
| 04/22/1991 | 13.00\% | 8.49\% | 4.51\% |
| 05/07/1991 | 13.50\% | 8.47\% | 5.03\% |
| 05/13/1991 | 13.25\% | 8.47\% | 4.78\% |
| 05/30/1991 | 12.75\% | 8.44\% | 4.31\% |
| 06/12/1991 | 12.00\% | 8.41\% | 3.59\% |
| 06/25/1991 | 11.70\% | 8.39\% | 3.31\% |
| 06/28/1991 | 12.50\% | 8.38\% | 4.12\% |
| 07/01/1991 | 12.00\% | 8.38\% | 3.62\% |
| 07/03/1991 | 12.50\% | 8.37\% | 4.13\% |
| 07/19/1991 | 12.10\% | 8.34\% | 3.76\% |
| 08/01/1991 | 12.90\% | 8.32\% | 4.58\% |
| 08/16/1991 | 13.20\% | 8.29\% | 4.91\% |
| 09/27/1991 | 12.50\% | 8.23\% | 4.27\% |
| 09/30/1991 | 12.25\% | 8.23\% | 4.02\% |
| 10/17/1991 | 13.00\% | 8.20\% | 4.80\% |
| 10/23/1991 | 12.50\% | 8.20\% | 4.30\% |
| 10/23/1991 | 12.55\% | 8.20\% | 4.35\% |
| 10/31/1991 | 11.80\% | 8.19\% | 3.61\% |
| 11/01/1991 | 12.00\% | 8.19\% | 3.81\% |
| 11/05/1991 | 12.25\% | 8.19\% | 4.06\% |
| 11/12/1991 | 12.50\% | 8.18\% | 4.32\% |
| 11/12/1991 | 13.25\% | 8.18\% | 5.07\% |
| 11/25/1991 | 12.40\% | 8.18\% | 4.22\% |
| 11/26/1991 | 11.60\% | 8.18\% | 3.42\% |
| 11/26/1991 | 12.50\% | 8.18\% | 4.32\% |
| 11/27/1991 | 12.10\% | 8.18\% | 3.92\% |
| 12/18/1991 | 12.25\% | 8.15\% | 4.10\% |
| 12/19/1991 | 12.60\% | 8.15\% | 4.45\% |
| 12/19/1991 | 12.80\% | 8.15\% | 4.65\% |
| 12/20/1991 | 12.65\% | 8.14\% | 4.51\% |
| 01/09/1992 | 12.80\% | 8.09\% | 4.71\% |
| 01/16/1992 | 12.75\% | 8.07\% | 4.68\% |
| 01/21/1992 | 12.00\% | 8.06\% | 3.94\% |
| 01/22/1992 | 13.00\% | 8.06\% | 4.94\% |
| 01/27/1992 | 12.65\% | 8.05\% | 4.60\% |
| 01/31/1992 | 12.00\% | 8.04\% | 3.96\% |
| 02/11/1992 | 12.40\% | 8.03\% | 4.37\% |
| 02/25/1992 | 12.50\% | 8.01\% | 4.49\% |
| 03/16/1992 | 11.43\% | 7.98\% | 3.45\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 03/18/1992 | 12.28\% | 7.98\% | 4.30\% |
| 04/02/1992 | 12.10\% | 7.95\% | 4.15\% |
| 04/09/1992 | 11.45\% | 7.94\% | 3.51\% |
| 04/10/1992 | 11.50\% | 7.93\% | 3.57\% |
| 04/14/1992 | 11.50\% | 7.93\% | 3.57\% |
| 05/05/1992 | 11.50\% | 7.89\% | 3.61\% |
| 05/12/1992 | 11.87\% | 7.88\% | 3.99\% |
| 05/12/1992 | 12.46\% | 7.88\% | 4.58\% |
| 06/01/1992 | 12.30\% | 7.87\% | 4.43\% |
| 06/12/1992 | 10.90\% | 7.86\% | 3.04\% |
| 06/26/1992 | 12.35\% | 7.85\% | 4.50\% |
| 06/29/1992 | 11.00\% | 7.85\% | 3.15\% |
| 06/30/1992 | 13.00\% | 7.85\% | 5.15\% |
| 07/13/1992 | 11.90\% | 7.84\% | 4.06\% |
| 07/13/1992 | 13.50\% | 7.84\% | 5.66\% |
| 07/22/1992 | 11.20\% | 7.83\% | 3.37\% |
| 08/03/1992 | 12.00\% | 7.81\% | 4.19\% |
| 08/06/1992 | 12.50\% | 7.80\% | 4.70\% |
| 09/22/1992 | 12.00\% | 7.71\% | 4.29\% |
| 09/28/1992 | 11.40\% | 7.71\% | 3.69\% |
| 09/30/1992 | 11.75\% | 7.70\% | 4.05\% |
| 10/02/1992 | 13.00\% | 7.70\% | 5.30\% |
| 10/12/1992 | 12.20\% | 7.70\% | 4.50\% |
| 10/16/1992 | 13.16\% | 7.70\% | 5.46\% |
| 10/30/1992 | 11.75\% | 7.71\% | 4.04\% |
| 11/03/1992 | 12.00\% | 7.71\% | 4.29\% |
| 12/03/1992 | 11.85\% | 7.68\% | 4.17\% |
| 12/15/1992 | 11.00\% | 7.66\% | 3.34\% |
| 12/16/1992 | 11.90\% | 7.66\% | 4.24\% |
| 12/16/1992 | 12.40\% | 7.66\% | 4.74\% |
| 12/17/1992 | 12.00\% | 7.66\% | 4.34\% |
| 12/22/1992 | 12.30\% | 7.65\% | 4.65\% |
| 12/22/1992 | 12.40\% | 7.65\% | 4.75\% |
| 12/29/1992 | 12.25\% | 7.63\% | 4.62\% |
| 12/30/1992 | 12.00\% | 7.63\% | 4.37\% |
| 12/31/1992 | 11.90\% | 7.63\% | 4.27\% |
| 01/12/1993 | 12.00\% | 7.61\% | 4.39\% |
| 01/21/1993 | 11.25\% | 7.59\% | 3.66\% |
| 02/02/1993 | 11.40\% | 7.56\% | 3.84\% |
| 02/15/1993 | 12.30\% | 7.52\% | 4.78\% |
| 02/24/1993 | 11.90\% | 7.49\% | 4.41\% |
| 02/26/1993 | 11.80\% | 7.48\% | 4.32\% |
| 02/26/1993 | 12.20\% | 7.48\% | 4.72\% |
| 04/23/1993 | 11.75\% | 7.29\% | 4.46\% |
| 05/11/1993 | 11.75\% | 7.25\% | 4.50\% |
| 05/14/1993 | 11.50\% | 7.24\% | 4.26\% |
| 05/25/1993 | 11.50\% | 7.23\% | 4.27\% |
| 05/28/1993 | 11.00\% | 7.22\% | 3.78\% |
| 06/03/1993 | 12.00\% | 7.21\% | 4.79\% |
| 06/16/1993 | 11.50\% | 7.19\% | 4.31\% |
| 06/18/1993 | 12.10\% | 7.18\% | 4.92\% |
| 06/25/1993 | 11.67\% | 7.17\% | 4.50\% |
| 07/21/1993 | 11.38\% | 7.10\% | 4.28\% |
| 07/23/1993 | 10.46\% | 7.09\% | 3.37\% |
| 08/24/1993 | 11.50\% | 6.96\% | 4.54\% |
| 09/21/1993 | 10.50\% | 6.81\% | 3.69\% |
| 09/29/1993 | 11.47\% | 6.77\% | 4.70\% |
| 09/30/1993 | 11.60\% | 6.76\% | 4.84\% |
| 11/02/1993 | 10.80\% | 6.60\% | 4.20\% |
| 11/12/1993 | 12.00\% | 6.57\% | 5.43\% |
| 11/26/1993 | 11.00\% | 6.52\% | 4.48\% |
| 12/14/1993 | 10.55\% | 6.48\% | 4.07\% |
| 12/16/1993 | 10.60\% | 6.48\% | 4.12\% |
| 12/21/1993 | 11.30\% | 6.47\% | 4.83\% |
| 01/04/1994 | 10.07\% | 6.44\% | 3.63\% |
| 01/13/1994 | 11.00\% | 6.42\% | 4.58\% |
| 01/21/1994 | 11.00\% | 6.40\% | 4.60\% |
| 01/28/1994 | 11.35\% | 6.39\% | 4.96\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 02/03/1994 | 11.40\% | 6.38\% | 5.02\% |
| 02/17/1994 | 10.60\% | 6.36\% | 4.24\% |
| 02/25/1994 | 11.25\% | 6.35\% | 4.90\% |
| 02/25/1994 | 12.00\% | 6.35\% | 5.65\% |
| 03/01/1994 | 11.00\% | 6.35\% | 4.65\% |
| 03/04/1994 | 11.00\% | 6.35\% | 4.65\% |
| 04/25/1994 | 11.00\% | 6.41\% | 4.59\% |
| 05/10/1994 | 11.75\% | 6.45\% | 5.30\% |
| 05/13/1994 | 10.50\% | 6.46\% | 4.04\% |
| 06/03/1994 | 11.00\% | 6.54\% | 4.46\% |
| 06/27/1994 | 11.40\% | 6.65\% | 4.75\% |
| 08/05/1994 | 12.75\% | 6.88\% | 5.87\% |
| 10/31/1994 | 10.00\% | 7.33\% | 2.67\% |
| 11/09/1994 | 10.85\% | 7.39\% | 3.46\% |
| 11/09/1994 | 10.85\% | 7.39\% | 3.46\% |
| 11/18/1994 | 11.20\% | 7.45\% | 3.75\% |
| 11/22/1994 | 11.60\% | 7.47\% | 4.13\% |
| 11/28/1994 | 11.06\% | 7.49\% | 3.57\% |
| 12/08/1994 | 11.50\% | 7.54\% | 3.96\% |
| 12/08/1994 | 11.70\% | 7.54\% | 4.16\% |
| 12/14/1994 | 10.95\% | 7.56\% | 3.39\% |
| 12/15/1994 | 11.50\% | 7.57\% | 3.93\% |
| 12/19/1994 | 11.50\% | 7.58\% | 3.92\% |
| 12/28/1994 | 12.15\% | 7.61\% | 4.54\% |
| 01/09/1995 | 12.28\% | 7.64\% | 4.64\% |
| 01/31/1995 | 11.00\% | 7.69\% | 3.31\% |
| 02/10/1995 | 12.60\% | 7.70\% | 4.90\% |
| 02/17/1995 | 11.90\% | 7.70\% | 4.20\% |
| 03/09/1995 | 11.50\% | 7.71\% | 3.79\% |
| 03/20/1995 | 12.00\% | 7.72\% | 4.28\% |
| 03/23/1995 | 12.81\% | 7.72\% | 5.09\% |
| 03/29/1995 | 11.60\% | 7.72\% | 3.88\% |
| 04/06/1995 | 11.10\% | 7.71\% | 3.39\% |
| 04/07/1995 | 11.00\% | 7.71\% | 3.29\% |
| 04/19/1995 | 11.00\% | 7.70\% | 3.30\% |
| 05/12/1995 | 11.63\% | 7.68\% | 3.95\% |
| 05/25/1995 | 11.20\% | 7.65\% | 3.55\% |
| 06/09/1995 | 11.25\% | 7.60\% | 3.65\% |
| 06/21/1995 | 12.25\% | 7.56\% | 4.69\% |
| 06/30/1995 | 11.10\% | 7.52\% | 3.58\% |
| 09/11/1995 | 11.30\% | 7.20\% | 4.10\% |
| 09/27/1995 | 11.30\% | 7.12\% | 4.18\% |
| 09/27/1995 | 11.50\% | 7.12\% | 4.38\% |
| 09/27/1995 | 11.75\% | 7.12\% | 4.63\% |
| 09/29/1995 | 11.00\% | 7.11\% | 3.89\% |
| 11/09/1995 | 11.38\% | 6.90\% | 4.48\% |
| 11/09/1995 | 12.36\% | 6.90\% | 5.46\% |
| 11/17/1995 | 11.00\% | 6.86\% | 4.14\% |
| 12/04/1995 | 11.35\% | 6.78\% | 4.57\% |
| 12/11/1995 | 11.40\% | 6.74\% | 4.66\% |
| 12/20/1995 | 11.60\% | 6.70\% | 4.90\% |
| 12/27/1995 | 12.00\% | 6.66\% | 5.34\% |
| 02/05/1996 | 12.25\% | 6.48\% | 5.77\% |
| 03/29/1996 | 10.67\% | 6.42\% | 4.25\% |
| 04/08/1996 | 11.00\% | 6.42\% | 4.58\% |
| 04/11/1996 | 12.59\% | 6.43\% | 6.16\% |
| 04/11/1996 | 12.59\% | 6.43\% | 6.16\% |
| 04/24/1996 | 11.25\% | 6.43\% | 4.82\% |
| 04/30/1996 | 11.00\% | 6.43\% | 4.57\% |
| 05/13/1996 | 11.00\% | 6.44\% | 4.56\% |
| 05/23/1996 | 11.25\% | 6.43\% | 4.82\% |
| 06/25/1996 | 11.25\% | 6.48\% | 4.77\% |
| 06/27/1996 | 11.20\% | 6.48\% | 4.72\% |
| 08/12/1996 | 10.40\% | 6.57\% | 3.83\% |
| 09/27/1996 | 11.00\% | 6.71\% | 4.29\% |
| 10/16/1996 | 12.25\% | 6.76\% | 5.49\% |
| 11/05/1996 | 11.00\% | 6.81\% | 4.19\% |
| 11/26/1996 | 11.30\% | 6.83\% | 4.47\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 12/18/1996 | 11.75\% | 6.83\% | 4.92\% |
| 12/31/1996 | 11.50\% | 6.83\% | 4.67\% |
| 01/03/1997 | 10.70\% | 6.83\% | 3.87\% |
| 02/13/1997 | 11.80\% | 6.82\% | 4.98\% |
| 02/20/1997 | 11.80\% | 6.82\% | 4.98\% |
| 03/31/1997 | 10.02\% | 6.80\% | 3.22\% |
| 04/02/1997 | 11.65\% | 6.80\% | 4.85\% |
| 04/28/1997 | 11.50\% | 6.81\% | 4.69\% |
| 04/29/1997 | 11.70\% | 6.81\% | 4.89\% |
| 07/17/1997 | 12.00\% | 6.77\% | 5.23\% |
| 12/12/1997 | 11.00\% | 6.60\% | 4.40\% |
| 12/23/1997 | 11.12\% | 6.57\% | 4.55\% |
| 02/02/1998 | 12.75\% | 6.39\% | 6.36\% |
| 03/02/1998 | 11.25\% | 6.29\% | 4.96\% |
| 03/06/1998 | 10.75\% | 6.27\% | 4.48\% |
| 03/20/1998 | 10.50\% | 6.22\% | 4.28\% |
| 04/30/1998 | 12.20\% | 6.12\% | 6.08\% |
| 07/10/1998 | 11.40\% | 5.94\% | 5.46\% |
| 09/15/1998 | 11.90\% | 5.78\% | 6.12\% |
| 11/30/1998 | 12.60\% | 5.58\% | 7.02\% |
| 12/10/1998 | 12.20\% | 5.54\% | 6.66\% |
| 12/17/1998 | 12.10\% | 5.52\% | 6.58\% |
| 02/05/1999 | 10.30\% | 5.38\% | 4.92\% |
| 03/04/1999 | 10.50\% | 5.34\% | 5.16\% |
| 04/06/1999 | 10.94\% | 5.32\% | 5.62\% |
| 07/29/1999 | 10.75\% | 5.52\% | 5.23\% |
| 09/23/1999 | 10.75\% | 5.70\% | 5.05\% |
| 11/17/1999 | 11.10\% | 5.90\% | 5.20\% |
| 01/07/2000 | 11.50\% | 6.05\% | 5.45\% |
| 01/07/2000 | 11.50\% | 6.05\% | 5.45\% |
| 02/17/2000 | 10.60\% | 6.17\% | 4.43\% |
| 03/28/2000 | 11.25\% | 6.20\% | 5.05\% |
| 05/24/2000 | 11.00\% | 6.18\% | 4.82\% |
| 07/18/2000 | 12.20\% | 6.16\% | 6.04\% |
| 09/29/2000 | 11.16\% | 6.03\% | 5.13\% |
| 11/28/2000 | 12.90\% | 5.89\% | 7.01\% |
| 11/30/2000 | 12.10\% | 5.88\% | 6.22\% |
| 01/23/2001 | 11.25\% | 5.79\% | 5.46\% |
| 02/08/2001 | 11.50\% | 5.77\% | 5.73\% |
| 05/08/2001 | 10.75\% | 5.62\% | 5.13\% |
| 06/26/2001 | 11.00\% | 5.62\% | 5.38\% |
| 07/25/2001 | 11.02\% | 5.60\% | 5.42\% |
| 07/25/2001 | 11.02\% | 5.60\% | 5.42\% |
| 07/31/2001 | 11.00\% | 5.59\% | 5.41\% |
| 08/31/2001 | 10.50\% | 5.56\% | 4.94\% |
| 09/07/2001 | 10.75\% | 5.55\% | 5.20\% |
| 09/10/2001 | 11.00\% | 5.55\% | 5.45\% |
| 09/20/2001 | 10.00\% | 5.55\% | 4.45\% |
| 10/24/2001 | 10.30\% | 5.54\% | 4.76\% |
| 11/28/2001 | 10.60\% | 5.49\% | 5.11\% |
| 12/03/2001 | 12.88\% | 5.49\% | 7.39\% |
| 12/20/2001 | 12.50\% | 5.50\% | 7.00\% |
| 01/22/2002 | 10.00\% | 5.50\% | 4.50\% |
| 03/27/2002 | 10.10\% | 5.45\% | 4.65\% |
| 04/22/2002 | 11.80\% | 5.45\% | 6.35\% |
| 05/28/2002 | 10.17\% | 5.46\% | 4.71\% |
| 06/10/2002 | 12.00\% | 5.47\% | 6.53\% |
| 06/18/2002 | 11.16\% | 5.48\% | 5.68\% |
| 06/20/2002 | 11.00\% | 5.48\% | 5.52\% |
| 06/20/2002 | 12.30\% | 5.48\% | 6.82\% |
| 07/15/2002 | 11.00\% | 5.48\% | 5.52\% |
| 09/12/2002 | 12.30\% | 5.45\% | 6.85\% |
| 09/26/2002 | 10.45\% | 5.41\% | 5.04\% |
| 12/04/2002 | 11.55\% | 5.29\% | 6.26\% |
| 12/13/2002 | 11.75\% | 5.27\% | 6.48\% |
| 12/20/2002 | 11.40\% | 5.25\% | 6.15\% |
| 01/08/2003 | 11.10\% | 5.19\% | 5.91\% |
| 01/31/2003 | 12.45\% | 5.13\% | 7.32\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 02/28/2003 | 12.30\% | 5.05\% | 7.25\% |
| 03/06/2003 | 10.75\% | 5.03\% | 5.72\% |
| 03/07/2003 | 9.96\% | 5.02\% | 4.94\% |
| 03/20/2003 | 12.00\% | 4.98\% | 7.02\% |
| 04/03/2003 | 12.00\% | 4.96\% | 7.04\% |
| 04/15/2003 | 11.15\% | 4.94\% | 6.21\% |
| 06/25/2003 | 10.75\% | 4.79\% | 5.96\% |
| 06/26/2003 | 10.75\% | 4.79\% | 5.96\% |
| 07/09/2003 | 9.75\% | 4.79\% | 4.96\% |
| 07/16/2003 | 9.75\% | 4.79\% | 4.96\% |
| 07/25/2003 | 9.50\% | 4.80\% | 4.70\% |
| 08/26/2003 | 10.50\% | 4.83\% | 5.67\% |
| 12/17/2003 | 9.85\% | 4.94\% | 4.91\% |
| 12/17/2003 | 10.70\% | 4.94\% | 5.76\% |
| 12/18/2003 | 11.50\% | 4.94\% | 6.56\% |
| 12/19/2003 | 12.00\% | 4.94\% | 7.06\% |
| 12/19/2003 | 12.00\% | 4.94\% | 7.06\% |
| 12/23/2003 | 10.50\% | 4.94\% | 5.56\% |
| 01/13/2004 | 12.00\% | 4.95\% | 7.05\% |
| 03/02/2004 | 10.75\% | 4.99\% | 5.76\% |
| 03/26/2004 | 10.25\% | 5.02\% | 5.23\% |
| 04/05/2004 | 11.25\% | 5.03\% | 6.22\% |
| 05/18/2004 | 10.50\% | 5.07\% | 5.43\% |
| 05/25/2004 | 10.25\% | 5.08\% | 5.17\% |
| 05/27/2004 | 10.25\% | 5.08\% | 5.17\% |
| 06/02/2004 | 11.22\% | 5.08\% | 6.14\% |
| 06/30/2004 | 10.50\% | 5.10\% | 5.40\% |
| 06/30/2004 | 10.50\% | 5.10\% | 5.40\% |
| 07/16/2004 | 11.60\% | 5.11\% | 6.49\% |
| 08/25/2004 | 10.25\% | 5.10\% | 5.15\% |
| 09/09/2004 | 10.40\% | 5.10\% | 5.30\% |
| 11/09/2004 | 10.50\% | 5.07\% | 5.43\% |
| 11/23/2004 | 11.00\% | 5.06\% | 5.94\% |
| 12/14/2004 | 10.97\% | 5.07\% | 5.90\% |
| 12/21/2004 | 11.25\% | 5.07\% | 6.18\% |
| 12/21/2004 | 11.50\% | 5.07\% | 6.43\% |
| 12/22/2004 | 10.70\% | 5.07\% | 5.63\% |
| 12/22/2004 | 11.50\% | 5.07\% | 6.43\% |
| 12/29/2004 | 9.85\% | 5.07\% | 4.78\% |
| 01/06/2005 | 10.70\% | 5.08\% | 5.62\% |
| 02/18/2005 | 10.30\% | 4.98\% | 5.32\% |
| 02/25/2005 | 10.50\% | 4.96\% | 5.54\% |
| 03/10/2005 | 11.00\% | 4.93\% | 6.07\% |
| 03/24/2005 | 10.30\% | 4.90\% | 5.40\% |
| 04/04/2005 | 10.00\% | 4.88\% | 5.12\% |
| 04/07/2005 | 10.25\% | 4.87\% | 5.38\% |
| 05/18/2005 | 10.25\% | 4.78\% | 5.47\% |
| 05/25/2005 | 10.75\% | 4.76\% | 5.99\% |
| 05/26/2005 | 9.75\% | 4.76\% | 4.99\% |
| 06/01/2005 | 9.75\% | 4.75\% | 5.00\% |
| 07/19/2005 | 11.50\% | 4.64\% | 6.86\% |
| 08/05/2005 | 11.75\% | 4.62\% | 7.13\% |
| 08/15/2005 | 10.13\% | 4.61\% | 5.52\% |
| 09/28/2005 | 10.00\% | 4.54\% | 5.46\% |
| 10/04/2005 | 10.75\% | 4.54\% | 6.21\% |
| 12/12/2005 | 11.00\% | 4.55\% | 6.45\% |
| 12/13/2005 | 10.75\% | 4.55\% | 6.20\% |
| 12/21/2005 | 10.29\% | 4.54\% | 5.75\% |
| 12/21/2005 | 10.40\% | 4.54\% | 5.86\% |
| 12/22/2005 | 11.00\% | 4.54\% | 6.46\% |
| 12/22/2005 | 11.15\% | 4.54\% | 6.61\% |
| 12/28/2005 | 10.00\% | 4.54\% | 5.46\% |
| 12/28/2005 | 10.00\% | 4.54\% | 5.46\% |
| 01/05/2006 | 11.00\% | 4.53\% | 6.47\% |
| 01/27/2006 | 9.75\% | 4.52\% | 5.23\% |
| 03/03/2006 | 10.39\% | 4.53\% | 5.86\% |
| 04/17/2006 | 10.20\% | 4.61\% | 5.59\% |
| 04/26/2006 | 10.60\% | 4.64\% | 5.96\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 05/17/2006 | 11.60\% | 4.69\% | 6.91\% |
| 06/06/2006 | 10.00\% | 4.74\% | 5.26\% |
| 06/27/2006 | 10.75\% | 4.80\% | 5.95\% |
| 07/06/2006 | 10.20\% | 4.83\% | 5.37\% |
| 07/24/2006 | 9.60\% | 4.86\% | 4.74\% |
| 07/26/2006 | 10.50\% | 4.86\% | 5.64\% |
| 07/28/2006 | 10.05\% | 4.86\% | 5.19\% |
| 08/23/2006 | 9.55\% | 4.89\% | 4.66\% |
| 09/01/2006 | 10.54\% | 4.90\% | 5.64\% |
| 09/14/2006 | 10.00\% | 4.91\% | 5.09\% |
| 10/06/2006 | 9.67\% | 4.92\% | 4.75\% |
| 11/21/2006 | 10.08\% | 4.95\% | 5.13\% |
| 11/21/2006 | 10.08\% | 4.95\% | 5.13\% |
| 11/21/2006 | 10.12\% | 4.95\% | 5.17\% |
| 12/01/2006 | 10.25\% | 4.95\% | 5.30\% |
| 12/01/2006 | 10.50\% | 4.95\% | 5.55\% |
| 12/07/2006 | 10.75\% | 4.95\% | 5.80\% |
| 12/21/2006 | 10.90\% | 4.95\% | 5.95\% |
| 12/21/2006 | 11.25\% | 4.95\% | 6.30\% |
| 12/22/2006 | 10.25\% | 4.95\% | 5.30\% |
| 01/05/2007 | 10.00\% | 4.95\% | 5.05\% |
| 01/11/2007 | 10.10\% | 4.95\% | 5.15\% |
| 01/11/2007 | 10.10\% | 4.95\% | 5.15\% |
| 01/11/2007 | 10.90\% | 4.95\% | 5.95\% |
| 01/12/2007 | 10.10\% | 4.95\% | 5.15\% |
| 01/13/2007 | 10.40\% | 4.95\% | 5.45\% |
| 01/19/2007 | 10.80\% | 4.94\% | 5.86\% |
| 03/21/2007 | 11.35\% | 4.87\% | 6.48\% |
| 03/22/2007 | 9.75\% | 4.86\% | 4.89\% |
| 05/15/2007 | 10.00\% | 4.81\% | 5.19\% |
| 05/17/2007 | 10.25\% | 4.81\% | 5.44\% |
| 05/17/2007 | 10.25\% | 4.81\% | 5.44\% |
| 05/22/2007 | 10.20\% | 4.80\% | 5.40\% |
| 05/22/2007 | 10.50\% | 4.80\% | 5.70\% |
| 05/23/2007 | 10.70\% | 4.80\% | 5.90\% |
| 05/25/2007 | 9.67\% | 4.80\% | 4.87\% |
| 06/15/2007 | 9.90\% | 4.82\% | 5.08\% |
| 06/21/2007 | 10.20\% | 4.83\% | 5.37\% |
| 06/22/2007 | 10.50\% | 4.83\% | 5.67\% |
| 06/28/2007 | 10.75\% | 4.84\% | 5.91\% |
| 07/12/2007 | 9.67\% | 4.86\% | 4.81\% |
| 07/19/2007 | 10.00\% | 4.87\% | 5.13\% |
| 07/19/2007 | 10.00\% | 4.87\% | 5.13\% |
| 08/15/2007 | 10.40\% | 4.88\% | 5.52\% |
| 10/09/2007 | 10.00\% | 4.91\% | 5.09\% |
| 10/17/2007 | 9.10\% | 4.91\% | 4.19\% |
| 10/31/2007 | 9.96\% | 4.90\% | 5.06\% |
| 11/29/2007 | 10.90\% | 4.87\% | 6.03\% |
| 12/06/2007 | 10.75\% | 4.86\% | 5.89\% |
| 12/13/2007 | 9.96\% | 4.86\% | 5.10\% |
| 12/14/2007 | 10.70\% | 4.86\% | 5.84\% |
| 12/14/2007 | 10.80\% | 4.86\% | 5.94\% |
| 12/19/2007 | 10.20\% | 4.86\% | 5.34\% |
| 12/20/2007 | 10.20\% | 4.85\% | 5.35\% |
| 12/20/2007 | 11.00\% | 4.85\% | 6.15\% |
| 12/28/2007 | 10.25\% | 4.85\% | 5.40\% |
| 12/31/2007 | 11.25\% | 4.85\% | 6.40\% |
| 01/08/2008 | 10.75\% | 4.83\% | 5.92\% |
| 01/17/2008 | 10.75\% | 4.81\% | 5.94\% |
| 01/28/2008 | 9.40\% | 4.80\% | 4.60\% |
| 01/30/2008 | 10.00\% | 4.79\% | 5.21\% |
| 01/31/2008 | 10.71\% | 4.79\% | 5.92\% |
| 02/29/2008 | 10.25\% | 4.75\% | 5.50\% |
| 03/12/2008 | 10.25\% | 4.73\% | 5.52\% |
| 03/25/2008 | 9.10\% | 4.68\% | 4.42\% |
| 04/22/2008 | 10.25\% | 4.60\% | 5.65\% |
| 04/24/2008 | 10.10\% | 4.60\% | 5.50\% |
| 05/01/2008 | 10.70\% | 4.59\% | 6.11\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 05/19/2008 | 11.00\% | 4.56\% | 6.44\% |
| 05/27/2008 | 10.00\% | 4.55\% | 5.45\% |
| 06/10/2008 | 10.70\% | 4.54\% | 6.16\% |
| 06/27/2008 | 10.50\% | 4.54\% | 5.96\% |
| 06/27/2008 | 11.04\% | 4.54\% | 6.50\% |
| 07/10/2008 | 10.43\% | 4.52\% | 5.91\% |
| 07/16/2008 | 9.40\% | 4.52\% | 4.88\% |
| 07/30/2008 | 10.80\% | 4.51\% | 6.29\% |
| 07/31/2008 | 10.70\% | 4.51\% | 6.19\% |
| 08/11/2008 | 10.25\% | 4.51\% | 5.74\% |
| 08/26/2008 | 10.18\% | 4.50\% | 5.68\% |
| 09/10/2008 | 10.30\% | 4.50\% | 5.80\% |
| 09/24/2008 | 10.65\% | 4.48\% | 6.17\% |
| 09/24/2008 | 10.65\% | 4.48\% | 6.17\% |
| 09/24/2008 | 10.65\% | 4.48\% | 6.17\% |
| 09/30/2008 | 10.20\% | 4.48\% | 5.72\% |
| 10/08/2008 | 10.15\% | 4.46\% | 5.69\% |
| 11/13/2008 | 10.55\% | 4.45\% | 6.10\% |
| 11/17/2008 | 10.20\% | 4.44\% | 5.76\% |
| 12/01/2008 | 10.25\% | 4.40\% | 5.85\% |
| 12/23/2008 | 11.00\% | 4.27\% | 6.73\% |
| 12/29/2008 | 10.00\% | 4.24\% | 5.76\% |
| 12/29/2008 | 10.20\% | 4.24\% | 5.96\% |
| 12/31/2008 | 10.75\% | 4.22\% | 6.53\% |
| 01/14/2009 | 10.50\% | 4.15\% | 6.35\% |
| 01/21/2009 | 10.50\% | 4.12\% | 6.38\% |
| 01/21/2009 | 10.50\% | 4.12\% | 6.38\% |
| 01/21/2009 | 10.50\% | 4.12\% | 6.38\% |
| 01/27/2009 | 10.76\% | 4.09\% | 6.67\% |
| 01/30/2009 | 10.50\% | 4.08\% | 6.42\% |
| 02/04/2009 | 8.75\% | 4.06\% | 4.69\% |
| 03/04/2009 | 10.50\% | 3.96\% | 6.54\% |
| 03/12/2009 | 11.50\% | 3.93\% | 7.57\% |
| 04/02/2009 | 11.10\% | 3.85\% | 7.25\% |
| 04/21/2009 | 10.61\% | 3.80\% | 6.81\% |
| 04/24/2009 | 10.00\% | 3.79\% | 6.21\% |
| 04/30/2009 | 11.25\% | 3.78\% | 7.47\% |
| 05/04/2009 | 10.74\% | 3.77\% | 6.97\% |
| 05/20/2009 | 10.25\% | 3.74\% | 6.51\% |
| 05/28/2009 | 10.50\% | 3.74\% | 6.76\% |
| 06/22/2009 | 10.00\% | 3.76\% | 6.24\% |
| 06/24/2009 | 10.80\% | 3.77\% | 7.03\% |
| 07/08/2009 | 10.63\% | 3.77\% | 6.86\% |
| 07/17/2009 | 10.50\% | 3.78\% | 6.72\% |
| 08/31/2009 | 10.25\% | 3.82\% | 6.43\% |
| 10/14/2009 | 10.70\% | 4.01\% | 6.69\% |
| 10/23/2009 | 10.88\% | 4.06\% | 6.82\% |
| 11/02/2009 | 10.70\% | 4.09\% | 6.61\% |
| 11/03/2009 | 10.70\% | 4.10\% | 6.60\% |
| 11/24/2009 | 10.25\% | 4.15\% | 6.10\% |
| 11/25/2009 | 10.75\% | 4.16\% | 6.59\% |
| 11/30/2009 | 10.35\% | 4.17\% | 6.18\% |
| 12/03/2009 | 10.50\% | 4.18\% | 6.32\% |
| 12/07/2009 | 10.70\% | 4.18\% | 6.52\% |
| 12/16/2009 | 10.90\% | 4.21\% | 6.69\% |
| 12/16/2009 | 11.00\% | 4.21\% | 6.79\% |
| 12/18/2009 | 10.40\% | 4.22\% | 6.18\% |
| 12/18/2009 | 10.40\% | 4.22\% | 6.18\% |
| 12/22/2009 | 10.20\% | 4.23\% | 5.97\% |
| 12/22/2009 | 10.40\% | 4.23\% | 6.17\% |
| 12/22/2009 | 10.40\% | 4.23\% | 6.17\% |
| 12/30/2009 | 10.00\% | 4.26\% | 5.74\% |
| 01/04/2010 | 10.80\% | 4.28\% | 6.52\% |
| 01/11/2010 | 11.00\% | 4.30\% | 6.70\% |
| 01/26/2010 | 10.13\% | 4.35\% | 5.78\% |
| 01/27/2010 | 10.40\% | 4.35\% | 6.05\% |
| 01/27/2010 | 10.40\% | 4.35\% | 6.05\% |
| 01/27/2010 | 10.70\% | 4.35\% | 6.35\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 02/09/2010 | 9.80\% | 4.38\% | 5.42\% |
| 02/18/2010 | 10.60\% | 4.40\% | 6.20\% |
| 02/24/2010 | 10.18\% | 4.41\% | 5.77\% |
| 03/02/2010 | 9.63\% | 4.41\% | 5.22\% |
| 03/04/2010 | 10.50\% | 4.41\% | 6.09\% |
| 03/05/2010 | 10.50\% | 4.41\% | 6.09\% |
| 03/11/2010 | 11.90\% | 4.42\% | 7.48\% |
| 03/17/2010 | 10.00\% | 4.41\% | 5.59\% |
| 03/25/2010 | 10.15\% | 4.42\% | 5.73\% |
| 04/02/2010 | 10.10\% | 4.43\% | 5.67\% |
| 04/27/2010 | 10.00\% | 4.46\% | 5.54\% |
| 04/29/2010 | 9.90\% | 4.46\% | 5.44\% |
| 04/29/2010 | 10.06\% | 4.46\% | 5.60\% |
| 04/29/2010 | 10.26\% | 4.46\% | 5.80\% |
| 05/12/2010 | 10.30\% | 4.45\% | 5.85\% |
| 05/12/2010 | 10.30\% | 4.45\% | 5.85\% |
| 05/28/2010 | 10.10\% | 4.44\% | 5.66\% |
| 05/28/2010 | 10.20\% | 4.44\% | 5.76\% |
| 06/07/2010 | 10.30\% | 4.44\% | 5.86\% |
| 06/16/2010 | 10.00\% | 4.44\% | 5.56\% |
| 06/28/2010 | 9.67\% | 4.43\% | 5.24\% |
| 06/28/2010 | 10.50\% | 4.43\% | 6.07\% |
| 06/30/2010 | 9.40\% | 4.43\% | 4.97\% |
| 07/01/2010 | 10.25\% | 4.43\% | 5.82\% |
| 07/15/2010 | 10.53\% | 4.43\% | 6.10\% |
| 07/15/2010 | 10.70\% | 4.43\% | 6.27\% |
| 07/30/2010 | 10.70\% | 4.41\% | 6.29\% |
| 08/04/2010 | 10.50\% | 4.41\% | 6.09\% |
| 08/06/2010 | 9.83\% | 4.41\% | 5.42\% |
| 08/25/2010 | 9.90\% | 4.37\% | 5.53\% |
| 09/03/2010 | 10.60\% | 4.35\% | 6.25\% |
| 09/14/2010 | 10.70\% | 4.33\% | 6.37\% |
| 09/16/2010 | 10.00\% | 4.33\% | 5.67\% |
| 09/16/2010 | 10.00\% | 4.33\% | 5.67\% |
| 09/30/2010 | 9.75\% | 4.29\% | 5.46\% |
| 10/14/2010 | 10.35\% | 4.24\% | 6.11\% |
| 10/28/2010 | 10.70\% | 4.21\% | 6.49\% |
| 11/02/2010 | 10.38\% | 4.20\% | 6.18\% |
| 11/04/2010 | 10.70\% | 4.20\% | 6.50\% |
| 11/19/2010 | 10.20\% | 4.18\% | 6.02\% |
| 11/22/2010 | 10.00\% | 4.18\% | 5.82\% |
| 12/01/2010 | 10.13\% | 4.16\% | 5.97\% |
| 12/06/2010 | 9.86\% | 4.15\% | 5.71\% |
| 12/09/2010 | 10.25\% | 4.15\% | 6.10\% |
| 12/13/2010 | 10.70\% | 4.15\% | 6.55\% |
| 12/14/2010 | 10.13\% | 4.15\% | 5.98\% |
| 12/15/2010 | 10.44\% | 4.15\% | 6.29\% |
| 12/17/2010 | 10.00\% | 4.15\% | 5.85\% |
| 12/20/2010 | 10.60\% | 4.15\% | 6.45\% |
| 12/21/2010 | 10.30\% | 4.14\% | 6.16\% |
| 12/27/2010 | 9.90\% | 4.14\% | 5.76\% |
| 12/29/2010 | 11.15\% | 4.14\% | 7.01\% |
| 01/05/2011 | 10.15\% | 4.13\% | 6.02\% |
| 01/12/2011 | 10.30\% | 4.12\% | 6.18\% |
| 01/13/2011 | 10.30\% | 4.12\% | 6.18\% |
| 01/18/2011 | 10.00\% | 4.12\% | 5.88\% |
| 01/20/2011 | 9.30\% | 4.12\% | 5.18\% |
| 01/20/2011 | 10.13\% | 4.12\% | 6.01\% |
| 01/31/2011 | 9.60\% | 4.12\% | 5.48\% |
| 02/03/2011 | 10.00\% | 4.12\% | 5.88\% |
| 02/25/2011 | 10.00\% | 4.14\% | 5.86\% |
| 03/25/2011 | 9.80\% | 4.18\% | 5.62\% |
| 03/30/2011 | 10.00\% | 4.18\% | 5.82\% |
| 04/12/2011 | 10.00\% | 4.21\% | 5.79\% |
| 04/25/2011 | 10.74\% | 4.23\% | 6.51\% |
| 04/26/2011 | 9.67\% | 4.23\% | 5.44\% |
| 04/27/2011 | 10.40\% | 4.24\% | 6.16\% |
| 05/04/2011 | 10.00\% | 4.24\% | 5.76\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 05/04/2011 | 10.00\% | 4.24\% | 5.76\% |
| 05/24/2011 | 10.50\% | 4.27\% | 6.23\% |
| 06/08/2011 | 10.75\% | 4.30\% | 6.45\% |
| 06/16/2011 | 9.20\% | 4.32\% | 4.88\% |
| 06/17/2011 | 9.95\% | 4.32\% | 5.63\% |
| 07/13/2011 | 10.20\% | 4.36\% | 5.84\% |
| 08/01/2011 | 9.20\% | 4.39\% | 4.81\% |
| 08/08/2011 | 10.00\% | 4.38\% | 5.62\% |
| 08/11/2011 | 10.00\% | 4.38\% | 5.62\% |
| 08/12/2011 | 10.35\% | 4.37\% | 5.98\% |
| 08/19/2011 | 10.25\% | 4.36\% | 5.89\% |
| 09/02/2011 | 12.88\% | 4.32\% | 8.56\% |
| 09/22/2011 | 10.00\% | 4.24\% | 5.76\% |
| 10/12/2011 | 10.30\% | 4.14\% | 6.16\% |
| 10/20/2011 | 10.50\% | 4.10\% | 6.40\% |
| 11/30/2011 | 10.90\% | 3.87\% | 7.03\% |
| 11/30/2011 | 10.90\% | 3.87\% | 7.03\% |
| 12/14/2011 | 10.00\% | 3.80\% | 6.20\% |
| 12/14/2011 | 10.30\% | 3.80\% | 6.50\% |
| 12/20/2011 | 10.20\% | 3.76\% | 6.44\% |
| 12/21/2011 | 10.20\% | 3.76\% | 6.44\% |
| 12/22/2011 | 9.90\% | 3.75\% | 6.15\% |
| 12/22/2011 | 10.40\% | 3.75\% | 6.65\% |
| 12/23/2011 | 10.19\% | 3.74\% | 6.45\% |
| 01/25/2012 | 10.50\% | 3.57\% | 6.93\% |
| 01/27/2012 | 10.50\% | 3.56\% | 6.94\% |
| 02/15/2012 | 10.20\% | 3.47\% | 6.73\% |
| 02/23/2012 | 9.90\% | 3.44\% | 6.46\% |
| 02/27/2012 | 10.25\% | 3.43\% | 6.82\% |
| 02/29/2012 | 10.40\% | 3.41\% | 6.99\% |
| 03/29/2012 | 10.37\% | 3.32\% | 7.05\% |
| 04/04/2012 | 10.00\% | 3.30\% | 6.70\% |
| 04/26/2012 | 10.00\% | 3.21\% | 6.79\% |
| 05/02/2012 | 10.00\% | 3.18\% | 6.82\% |
| 05/07/2012 | 9.80\% | 3.17\% | 6.63\% |
| 05/15/2012 | 10.00\% | 3.14\% | 6.86\% |
| 05/29/2012 | 10.05\% | 3.11\% | 6.94\% |
| 06/07/2012 | 10.30\% | 3.08\% | 7.22\% |
| 06/14/2012 | 9.40\% | 3.06\% | 6.34\% |
| 06/15/2012 | 10.40\% | 3.06\% | 7.34\% |
| 06/18/2012 | 9.60\% | 3.06\% | 6.54\% |
| 06/19/2012 | 9.25\% | 3.05\% | 6.20\% |
| 06/26/2012 | 10.10\% | 3.04\% | 7.06\% |
| 06/29/2012 | 10.00\% | 3.04\% | 6.96\% |
| 07/09/2012 | 10.20\% | 3.03\% | 7.17\% |
| 07/16/2012 | 9.80\% | 3.02\% | 6.78\% |
| 07/20/2012 | 9.31\% | 3.01\% | 6.30\% |
| 07/20/2012 | 9.81\% | 3.01\% | 6.80\% |
| 09/13/2012 | 9.80\% | 2.94\% | 6.86\% |
| 09/19/2012 | 9.80\% | 2.94\% | 6.86\% |
| 09/19/2012 | 10.05\% | 2.94\% | 7.11\% |
| 09/26/2012 | 9.50\% | 2.94\% | 6.56\% |
| 10/12/2012 | 9.60\% | 2.93\% | 6.67\% |
| 10/23/2012 | 9.75\% | 2.93\% | 6.82\% |
| 10/24/2012 | 10.30\% | 2.93\% | 7.37\% |
| 11/09/2012 | 10.30\% | 2.92\% | 7.38\% |
| 11/28/2012 | 10.40\% | 2.90\% | 7.50\% |
| 11/29/2012 | 9.75\% | 2.89\% | 6.86\% |
| 11/29/2012 | 9.88\% | 2.89\% | 6.99\% |
| 12/05/2012 | 9.71\% | 2.89\% | 6.82\% |
| 12/05/2012 | 10.40\% | 2.89\% | 7.51\% |
| 12/12/2012 | 9.80\% | 2.88\% | 6.92\% |
| 12/13/2012 | 9.50\% | 2.88\% | 6.62\% |
| 12/13/2012 | 10.50\% | 2.88\% | 7.62\% |
| 12/14/2012 | 10.40\% | 2.88\% | 7.52\% |
| 12/19/2012 | 9.71\% | 2.87\% | 6.84\% |
| 12/19/2012 | 10.25\% | 2.87\% | 7.38\% |
| 12/20/2012 | 9.50\% | 2.87\% | 6.63\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 12/20/2012 | 9.80\% | 2.87\% | 6.93\% |
| 12/20/2012 | 10.25\% | 2.87\% | 7.38\% |
| 12/20/2012 | 10.25\% | 2.87\% | 7.38\% |
| 12/20/2012 | 10.30\% | 2.87\% | 7.43\% |
| 12/20/2012 | 10.40\% | 2.87\% | 7.53\% |
| 12/20/2012 | 10.45\% | 2.87\% | 7.58\% |
| 12/21/2012 | 10.20\% | 2.87\% | 7.33\% |
| 12/26/2012 | 9.80\% | 2.86\% | 6.94\% |
| 01/09/2013 | 9.70\% | 2.85\% | 6.85\% |
| 01/09/2013 | 9.70\% | 2.85\% | 6.85\% |
| 01/09/2013 | 9.70\% | 2.85\% | 6.85\% |
| 01/16/2013 | 9.60\% | 2.84\% | 6.76\% |
| 01/16/2013 | 9.60\% | 2.84\% | 6.76\% |
| 02/13/2013 | 10.20\% | 2.84\% | 7.36\% |
| 02/22/2013 | 9.75\% | 2.85\% | 6.90\% |
| 02/27/2013 | 10.00\% | 2.86\% | 7.14\% |
| 03/14/2013 | 9.30\% | 2.88\% | 6.42\% |
| 03/27/2013 | 9.80\% | 2.90\% | 6.90\% |
| 05/01/2013 | 9.84\% | 2.94\% | 6.90\% |
| 05/15/2013 | 10.30\% | 2.96\% | 7.34\% |
| 05/30/2013 | 10.20\% | 2.98\% | 7.22\% |
| 05/31/2013 | 9.00\% | 2.98\% | 6.02\% |
| 06/11/2013 | 10.00\% | 3.00\% | 7.00\% |
| 06/21/2013 | 9.75\% | 3.02\% | 6.73\% |
| 06/25/2013 | 9.80\% | 3.03\% | 6.77\% |
| 07/12/2013 | 9.36\% | 3.07\% | 6.29\% |
| 08/08/2013 | 9.83\% | 3.14\% | 6.69\% |
| 08/14/2013 | 9.15\% | 3.16\% | 5.99\% |
| 09/11/2013 | 10.20\% | 3.26\% | 6.94\% |
| 09/11/2013 | 10.25\% | 3.26\% | 6.99\% |
| 09/24/2013 | 10.20\% | 3.31\% | 6.89\% |
| 10/03/2013 | 9.65\% | 3.33\% | 6.32\% |
| 11/06/2013 | 10.20\% | 3.41\% | 6.79\% |
| 11/21/2013 | 10.00\% | 3.44\% | 6.56\% |
| 11/26/2013 | 10.00\% | 3.45\% | 6.55\% |
| 12/03/2013 | 10.25\% | 3.47\% | 6.78\% |
| 12/04/2013 | 9.50\% | 3.47\% | 6.03\% |
| 12/05/2013 | 10.20\% | 3.48\% | 6.72\% |
| 12/09/2013 | 8.72\% | 3.48\% | 5.24\% |
| 12/09/2013 | 9.75\% | 3.48\% | 6.27\% |
| 12/13/2013 | 9.75\% | 3.50\% | 6.25\% |
| 12/16/2013 | 9.95\% | 3.50\% | 6.45\% |
| 12/16/2013 | 9.95\% | 3.50\% | 6.45\% |
| 12/16/2013 | 10.12\% | 3.50\% | 6.62\% |
| 12/17/2013 | 9.50\% | 3.51\% | 5.99\% |
| 12/17/2013 | 10.95\% | 3.51\% | 7.44\% |
| 12/18/2013 | 8.72\% | 3.51\% | 5.21\% |
| 12/18/2013 | 9.80\% | 3.51\% | 6.29\% |
| 12/19/2013 | 10.15\% | 3.51\% | 6.64\% |
| 12/30/2013 | 9.50\% | 3.54\% | 5.96\% |
| 02/20/2014 | 9.20\% | 3.68\% | 5.52\% |
| 02/26/2014 | 9.75\% | 3.69\% | 6.06\% |
| 03/17/2014 | 9.55\% | 3.72\% | 5.83\% |
| 03/26/2014 | 9.40\% | 3.73\% | 5.67\% |
| 03/26/2014 | 9.96\% | 3.73\% | 6.23\% |
| 04/02/2014 | 9.70\% | 3.73\% | 5.97\% |
| 05/16/2014 | 9.80\% | 3.70\% | 6.10\% |
| 05/30/2014 | 9.70\% | 3.68\% | 6.02\% |
| 06/06/2014 | 10.40\% | 3.67\% | 6.73\% |
| 06/30/2014 | 9.55\% | 3.64\% | 5.91\% |
| 07/02/2014 | 9.62\% | 3.64\% | 5.98\% |
| 07/10/2014 | 9.95\% | 3.63\% | 6.32\% |
| 07/23/2014 | 9.75\% | 3.61\% | 6.14\% |
| 07/29/2014 | 9.45\% | 3.60\% | 5.85\% |
| 07/31/2014 | 9.90\% | 3.60\% | 6.30\% |
| 08/20/2014 | 9.75\% | 3.57\% | 6.18\% |
| 08/25/2014 | 9.60\% | 3.56\% | 6.04\% |
| 08/29/2014 | 9.80\% | 3.54\% | 6.26\% |


| Bond Yield Plus Risk Premium |  |  |  |
| :---: | :---: | :---: | :---: |
| [6] | [7] | [8] | [9] |
| Date of |  | 30-Year |  |
| Electric | Return on | Treasury |  |
| Rate Case | Equity | Yield | Risk Premium |
| 09/11/2014 | 9.60\% | 3.51\% | 6.09\% |
| 09/15/2014 | 10.25\% | 3.51\% | 6.74\% |
| 10/09/2014 | 9.80\% | 3.45\% | 6.35\% |
| 11/06/2014 | 9.56\% | 3.37\% | 6.19\% |
| 11/06/2014 | 10.20\% | 3.37\% | 6.83\% |
| 11/14/2014 | 10.20\% | 3.35\% | 6.85\% |
| 11/26/2014 | 9.70\% | 3.33\% | 6.37\% |
| 11/26/2014 | 10.20\% | 3.33\% | 6.87\% |
| 12/04/2014 | 9.68\% | 3.31\% | 6.37\% |
| 12/10/2014 | 9.25\% | 3.29\% | 5.96\% |
| 12/10/2014 | 9.25\% | 3.29\% | 5.96\% |
| 12/11/2014 | 10.07\% | 3.29\% | 6.78\% |
| 12/12/2014 | 10.20\% | 3.28\% | 6.92\% |
| 12/17/2014 | 9.17\% | 3.27\% | 5.90\% |
| 12/18/2014 | 9.83\% | 3.26\% | 6.57\% |
| 01/23/2015 | 9.50\% | 3.14\% | 6.36\% |
| 02/24/2015 | 9.83\% | 3.04\% | 6.79\% |
| 03/18/2015 | 9.75\% | 2.98\% | 6.77\% |
| 03/25/2015 | 9.50\% | 2.96\% | 6.54\% |
| 03/26/2015 | 9.72\% | 2.95\% | 6.77\% |
| 04/23/2015 | 10.20\% | 2.87\% | 7.33\% |
| 04/29/2015 | 9.53\% | 2.86\% | 6.67\% |
| 05/01/2015 | 9.60\% | 2.85\% | 6.75\% |
| 05/26/2015 | 9.75\% | 2.83\% | 6.92\% |
| 06/17/2015 | 9.00\% | 2.82\% | 6.18\% |
| 06/17/2015 | 9.00\% | 2.82\% | 6.18\% |
| 09/02/2015 | 9.50\% | 2.79\% | 6.71\% |
| 09/10/2015 | 9.30\% | 2.79\% | 6.51\% |
| 10/15/2015 | 9.00\% | 2.81\% | 6.19\% |
| 11/19/2015 | 10.00\% | 2.88\% | 7.12\% |
| 11/19/2015 | 10.30\% | 2.88\% | 7.42\% |
| 12/03/2015 | 10.00\% | 2.90\% | 7.10\% |
| 12/09/2015 | 9.14\% | 2.90\% | 6.24\% |
| 12/09/2015 | 9.14\% | 2.90\% | 6.24\% |
| 12/11/2015 | 10.30\% | 2.90\% | 7.40\% |
| 12/15/2015 | 9.60\% | 2.91\% | 6.69\% |
| 12/17/2015 | 9.70\% | 2.91\% | 6.79\% |
| 12/18/2015 | 9.50\% | 2.91\% | 6.59\% |
| 12/30/2015 | 9.50\% | 2.93\% | 6.57\% |
| 01/06/2016 | 9.50\% | 2.94\% | 6.56\% |
| 02/23/2016 | 9.75\% | 2.94\% | 6.81\% |
| 03/16/2016 | 9.85\% | 2.91\% | 6.94\% |
| 04/29/2016 | 9.80\% | 2.83\% | 6.97\% |
| 06/03/2016 | 9.75\% | 2.80\% | 6.95\% |
| 06/08/2016 | 9.48\% | 2.80\% | 6.68\% |
| 06/15/2016 | 9.00\% | 2.78\% | 6.22\% |
| 06/15/2016 | 9.00\% | 2.78\% | 6.22\% |
| 07/18/2016 | 9.98\% | 2.71\% | 7.27\% |
| 08/09/2016 | 9.85\% | 2.66\% | 7.19\% |
| 08/18/2016 | 9.50\% | 2.63\% | 6.87\% |
| 08/24/2016 | 9.75\% | 2.62\% | 7.13\% |
| 09/01/2016 | 9.50\% | 2.59\% | 6.91\% |
| 09/08/2016 | 10.00\% | 2.58\% | 7.42\% |
| 09/28/2016 | 9.58\% | 2.54\% | 7.04\% |
| 09/30/2016 | 9.90\% | 2.53\% | 7.37\% |
| 11/09/2016 | 9.80\% | 2.48\% | 7.32\% |
| 11/10/2016 | 9.50\% | 2.48\% | 7.02\% |
| 11/15/2016 | 9.55\% | 2.49\% | 7.06\% |
| 11/18/2016 | 10.00\% | 2.50\% | 7.50\% |
| 11/29/2016 | 10.55\% | 2.51\% | 8.04\% |
| 12/01/2016 | 10.00\% | 2.51\% | 7.49\% |
| 12/06/2016 | 8.64\% | 2.52\% | 6.12\% |
| 12/06/2016 | 8.64\% | 2.52\% | 6.12\% |
| 12/07/2016 | 10.10\% | 2.52\% | 7.58\% |
| 12/12/2016 | 9.60\% | 2.53\% | 7.07\% |
| 12/14/2016 | 9.10\% | 2.53\% | 6.57\% |
| 12/19/2016 | 9.37\% | 2.54\% | 6.83\% |
| 12/19/2016 | 9.00\% | 2.54\% | 6.46\% |

Bond Yield Plus Risk Premium

| $[6]$ | $[7]$ | $[8]$ <br> $30-Y e a r$ | $[9]$ |
| :---: | :---: | :---: | :---: |
| Date of |  | Treasury <br> Electric | Return on <br> Rate Case |
| Equity | Yield | Risk Premium |  |
| $12 / 22 / 2016$ | $9.90 \%$ | $2.55 \%$ | $7.35 \%$ |
| $12 / 22 / 2016$ | $9.60 \%$ | $2.55 \%$ | $7.05 \%$ |
| $12 / 28 / 2016$ | $9.50 \%$ | $2.55 \%$ | $6.95 \%$ |
|  |  | \# of Cases: |  |
|  |  | Average: | 1,499 |
|  |  |  | $4.55 \%$ |

Value Line Projected Sustainable Growth And Return On Common Equity
$\left.\begin{array}{|lccccc|c|}\hline & \begin{array}{c}\text { Value Line } \\ \text { Return on } \\ \text { Common } \\ \text { Equity ("R") }\end{array} & \begin{array}{c}\text { Value Line } \\ \text { Payout Ratio }\end{array} & \begin{array}{c}\text { Retention Ratio } \\ \text { ("B") }\end{array} & & & \begin{array}{c}\text { Value Line } \\ \text { Retained to }\end{array} \\ \text { Company } & \text { Common }\end{array}\right]$

Source: Value Line projections 2019-2021 period, as of December 30, 2016.
Note: Retention Ratio equals 1 - Payout Ratio


|  |  | Net Profit | Revenue | Net Plant |  | Total Capital | Common Equity Ratio | Book Value per Share | Shares Outstanding | Reported Return on Com Equity | Profit Margin | Asset Turnover | Equity Multiplier | Calculated Return on Equity | Common Equity Check | ROE Check | Annual Increase in Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 2010 | 295.30 | 3,716.90 | 6,464.40 |  | 4,652.50 | 49.20\% | 11.73 | 195.20 | 12.90\% | 7.94\% | 57.50\% | 282.41\% | 12.90\% | 100.03\% | 100.01\% | 9.4\% |
|  | 2011 | 342.90 | 3,915.90 | 7,474.00 |  | 5,300.40 | 48.40\% | 13.06 | 196.20 | 13.40\% | 8.76\% | 52.39\% | 291.34\% | 13.37\% | 99.88\% | 99.75\% | 15.6\% |
|  | 2012 | 355.00 | 3,671.20 | 8,344.80 |  | 5,615.80 | 49.30\% | 14.00 | 197.60 | 12.80\% | 9.67\% | 43.99\% | 301.41\% | 12.82\% | 99.92\% | 100.18\% | 11.7\% |
|  | 2013 | 387.60 | 2,867.70 | 6,672.80 |  | 5,337.20 | 56.90\% | 15.30 | 198.50 | 12.80\% | 13.52\% | 42.98\% | 219.73\% | 12.76\% | 100.01\% | 99.71\% | -20.0\% |
|  | 2014 | 395.80 | 2,453.10 | 6,979.90 |  | 5,999.70 | 54.10\% | 16.27 | 199.40 | 12.20\% | 16.13\% | 35.15\% | 215.04\% | 12.19\% | 99.95\% | 99.95\% | 4.6\% |
|  | 2015 | 337.60 | 2,196.90 | 7,322.40 |  | 5,971.60 | 55.70\% | 16.66 | 199.70 | 10.20\% | 15.37\% | 30.00\% | 220.14\% | 10.15\% | 100.02\% | 99.51\% | 4.9\% |
|  | 2019-2021 | 450.00 | 2,600.00 | 8,825.00 |  | 8,125.00 | 49.00\% | 19.75 | 201.50 | 11.50\% | 17.31\% | 29.46\% | 221.66\% | 11.30\% | 99.96\% | 98.29\% | 20.5\% |
| OTTR | 2007 | \$ 54.00 | \$ 1,238.90 | \$ 854.00 | \$ | 882.10 | 59.40\% | \$ 17.55 | 29.85 | 10.20\% | 4.36\% | 145.07\% | 162.99\% | 10.31\% | 99.98\% | 101.04\% |  |
|  | 2008 | 35.10 | 1,311.20 | 1,037.60 |  | 1,032.50 | 65.60\% | 19.14 | 35.38 | 5.10\% | 2.68\% | 126.37\% | 153.19\% | 5.18\% | 99.98\% | 101.61\% | 21.5\% |
|  | 2009 | 26.00 | 1,039.50 | 1,098.60 |  | 1,124.40 | 59.80\% | 18.78 | 35.81 | 3.80\% | 2.50\% | 94.62\% | 163.39\% | 3.87\% | 100.02\% | 101.76\% | 5.9\% |
|  | 2010 | 13.60 | 1,119.10 | 1,108.70 |  | 1,083.30 | 58.40\% | 17.57 | 36.00 | 2.00\% | 1.22\% | 100.94\% | 175.25\% | 2.15\% | 99.98\% | 107.48\% | 0.9\% |
|  | 2011 | 16.40 | 1,077.90 | 1,077.50 |  | 1,058.90 | 54.00\% | 15.83 | 36.10 | 2.70\% | 1.52\% | 100.04\% | 188.44\% | 2.87\% | 99.94\% | 106.23\% | -2.8\% |
|  | 2012 | 39.00 | 859.20 | 1,049.50 |  | 959.20 | 54.40\% | 14.43 | 36.17 | 7.30\% | 4.54\% | 81.87\% | 201.13\% | 7.47\% | 100.02\% | 102.38\% | -2.6\% |
|  | 2013 | 50.20 | 893.30 | 1,167.00 |  | 924.40 | 57.90\% | 14.75 | 36.27 | 9.30\% | 5.62\% | 76.55\% | 218.04\% | 9.38\% | 99.95\% | 100.85\% | 11.2\% |
|  | 2014 | 56.90 | 799.30 | 1,268.50 |  | 1,071.30 | 53.50\% | 15.39 | 37.22 | 9.90\% | 7.12\% | 63.01\% | 221.32\% | 9.93\% | 99.94\% | 100.28\% | 8.7\% |
|  | 2015 | 58.60 | 779.80 | 1,387.80 |  | 1,051.00 | 57.60\% | 15.98 | 37.86 | 9.70\% | 7.51\% | 56.19\% | 229.25\% | 9.68\% | 99.94\% | 99.79\% | 9.4\% |
|  | 2019-2021 | 90.00 | 1,050.00 | 1,900.00 |  | 1,650.00 | 54.50\% | 20.95 | 43.00 | 10.00\% | 8.57\% | 55.26\% | 211.29\% | 10.01\% | 100.18\% | 100.08\% | 36.9\% |
| PNW | 2007 | \$ 298.80 | \$ 3,523.60 | \$ 8,436.40 | \$ | 6,658.70 | 53.00\% | \$ 35.15 | 100.49 | 8.50\% | 8.48\% | 41.77\% | 239.05\% | 8.47\% | 100.09\% | 99.61\% |  |
|  | 2008 | 213.60 | 3,367.10 | 8,916.70 |  | 6,477.60 | 53.20\% | 34.16 | 100.89 | 6.20\% | 6.34\% | 37.76\% | 258.75\% | 6.20\% | 100.01\% | 99.97\% | 5.7\% |
|  | 2009 | 229.20 | 3,297.10 | 9,257.80 |  | 6,686.60 | 49.60\% | 32.69 | 101.43 | 6.90\% | 6.95\% | 35.61\% | 279.14\% | 6.91\% | 99.98\% | 100.16\% | 3.8\% |
|  | 2010 | 330.40 | 3,263.60 | 9,578.80 |  | 6,729.10 | 54.70\% | 33.86 | 108.77 | 9.00\% | 10.12\% | 34.07\% | 260.24\% | 8.98\% | 100.06\% | 99.74\% | 3.5\% |
|  | 2011 | 328.20 | 3,241.40 | 9,962.30 |  | 6,840.90 | 55.90\% | 34.98 | 109.25 | 8.60\% | 10.13\% | 32.54\% | 260.52\% | 8.58\% | 99.93\% | 99.80\% | 4.0\% |
|  | 2012 | 387.40 | 3,301.80 | 10,396.00 |  | 7,171.90 | 55.40\% | 36.20 | 109.74 | 9.80\% | 11.73\% | 31.76\% | 261.65\% | 9.75\% | 99.98\% | 99.49\% | 4.4\% |
|  | 2013 | 406.10 | 3,454.60 | 10,889.00 |  | 6,990.90 | 60.00\% | 38.07 | 110.18 | 9.70\% | 11.76\% | 31.73\% | 259.60\% | 9.68\% | 100.00\% | 99.81\% | 4.7\% |
|  | 2014 | 397.60 | 3,491.60 | 11,194.00 |  | 7,398.70 | 59.00\% | 39.50 | 110.57 | 9.10\% | 11.39\% | 31.19\% | 256.44\% | 9.11\% | 100.05\% | 100.09\% | 2.8\% |
|  | 2015 | 437.30 | 3,495.40 | 11,809.00 |  | 8,046.30 | 57.00\% | 41.30 | 110.98 | 9.50\% | 12.51\% | 29.60\% | 257.48\% | 9.53\% | 99.94\% | 100.37\% | 5.5\% |
|  | 2019-2021 | 550.00 | 4,250.00 | 14,575.00 |  | 10,150.00 | 55.00\% | 49.00 | 113.50 | 10.00\% | 12.94\% | 29.16\% | 261.08\% | 9.85\% | 99.62\% | 98.52\% | 23.4\% |


|  |  | Net Profit | Revenue | Net Plant | $\begin{gathered} \text { Total } \\ \text { Capital } \end{gathered}$ |  | Common Equity Ratio | Book Value per Share |  | Shares Outstanding | Reported <br> Return on Com Equity | Profit Margin | $\begin{gathered} \text { Asset } \\ \text { Turnover } \end{gathered}$ | Equity Multiplier | Calculated Return on Equity | Common Equity Check | ROE Check | Annual Increase in Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| PNM | 2007 | \$ 59.90 | \$ 1,914.00 | \$ 2,935.40 | \$ | 2,935.80 | 57.60\% | \$ | 22.03 | 76.81 | 3.50\% | 3.13\% | 65.20\% | 173.59\% | 3.54\% | 100.07\% | 101.21\% |  |
|  | 2008 | 8.10 | 1,959.50 | 3,192.00 |  | 3,025.40 | 54.00\% |  | 18.89 | 86.53 | 0.50\% | 0.41\% | 61.39\% | 195.38\% | 0.50\% | 100.05\% | 99.16\% | 8.7\% |
|  | 2009 | 53.50 | 1,647.70 | 3,332.40 |  | 3,214.90 | 51.00\% |  | 18.90 | 86.67 | 3.20\% | 3.25\% | 49.44\% | 203.24\% | 3.26\% | 99.91\% | 101.97\% | 4.4\% |
|  | 2010 | 80.00 | 1,673.50 | 3,444.40 |  | 3,100.30 | 49.20\% |  | 17.60 | 86.67 | 5.20\% | 4.78\% | 48.59\% | 225.81\% | 5.24\% | 100.00\% | 100.86\% | 3.4\% |
|  | 2011 | 96.60 | 1,700.60 | 3,627.10 |  | 3,245.60 | 48.10\% |  | 19.62 | 79.65 | 6.10\% | 5.68\% | 46.89\% | 232.34\% | 6.19\% | 100.10\% | 101.44\% | 5.3\% |
|  | 2012 | 105.60 | 1,342.40 | 3,746.50 |  | 3,277.90 | 48.70\% |  | 20.05 | 79.65 | 6.60\% | 7.87\% | 35.83\% | 234.69\% | 6.62\% | 100.04\% | 100.23\% | 3.3\% |
|  | 2013 | 113.50 | 1,387.90 | 3,933.90 |  | 3,344.00 | 49.70\% |  | 20.87 | 79.65 | 6.80\% | 8.18\% | 35.28\% | 236.70\% | 6.83\% | 100.02\% | 100.43\% | 5.0\% |
|  | 2014 | 116.30 | 1,435.90 | 4,270.00 |  | 3,437.10 | 51.90\% |  | 22.39 | 79.65 | 6.50\% | 8.10\% | 33.63\% | 239.37\% | 6.52\% | 99.97\% | 100.30\% | 8.5\% |
|  | 2015 | 131.50 | 1,439.10 | 4,535.40 |  | 3,633.30 | 45.50\% |  | 20.78 | 79.65 | 7.90\% | 9.14\% | 31.73\% | 274.35\% | 7.95\% | 100.12\% | 100.69\% | 6.2\% |
|  | 2019-2021 | 190.00 | 1,625.00 | 5,270.00 |  | 4,385.00 | 46.50\% |  | 25.50 | 80.00 | 9.50\% | 11.69\% | 30.83\% | 258.46\% | 9.32\% | 100.05\% | 98.09\% | 16.2\% |
| POR | 2007 | \$ 145.00 | \$ 1,743.00 | \$ 3,066.00 | \$ | 2,629.00 | 50.10\% | \$ | 21.05 | 62.53 | 11.00\% | 8.32\% | 56.85\% | 232.78\% | 11.01\% | 99.93\% | 100.08\% |  |
|  | 2008 | 87.00 | 1,745.00 | 3,301.00 |  | 2,518.00 | 53.80\% |  | 21.64 | 62.58 | 6.40\% | 4.99\% | 52.86\% | 243.67\% | 6.42\% | 99.97\% | 100.35\% | 7.7\% |
|  | 2009 | 95.00 | 1,804.00 | 3,858.00 |  | 3,100.00 | 49.70\% |  | 20.50 | 75.21 | 6.20\% | 5.27\% | 46.76\% | 250.41\% | 6.17\% | 100.07\% | 99.45\% | 16.9\% |
|  | 2010 | 125.00 | 1,783.00 | 4,133.00 |  | 3,390.00 | 47.00\% |  | 21.14 | 75.32 | 7.90\% | 7.01\% | 43.14\% | 259.40\% | 7.85\% | 99.94\% | 99.31\% | 7.1\% |
|  | 2011 | 147.00 | 1,813.00 | 4,285.00 |  | 3,298.00 | 50.40\% |  | 22.07 | 75.36 | 8.80\% | 8.11\% | 42.31\% | 257.79\% | 8.84\% | 100.06\% | 100.50\% | 3.7\% |
|  | 2012 | 141.00 | 1,805.00 | 4,392.00 |  | 3,264.00 | 52.90\% |  | 22.87 | 75.56 | 8.20\% | 7.81\% | 41.10\% | 254.36\% | 8.17\% | 100.08\% | 99.59\% | 2.5\% |
|  | 2013 | 137.00 | 1,810.00 | 4,880.00 |  | 3,735.00 | 48.70\% |  | 23.30 | 78.09 | 7.50\% | 7.57\% | 37.09\% | 268.29\% | 7.53\% | 100.03\% | 100.42\% | 11.1\% |
|  | 2014 | 175.00 | 1,900.00 | 5,679.00 |  | 4,037.00 | 47.30\% |  | 24.43 | 78.23 | 9.20\% | 9.21\% | 33.46\% | 297.41\% | 9.16\% | 100.09\% | 99.62\% | 16.4\% |
|  | 2015 | 172.00 | 1,898.00 | 6,012.00 |  | 4,329.00 | 52.20\% |  | 25.43 | 88.79 | 7.60\% | 9.06\% | 31.57\% | 266.05\% | 7.61\% | 99.92\% | 100.15\% | 5.9\% |
|  | 2019-2021 | 245.00 | 2,200.00 | 6,200.00 |  | 5,200.00 | 52.00\% |  | 30.25 | 89.80 | 9.00\% | 11.14\% | 35.48\% | 229.29\% | 9.06\% | 100.46\% | 100.67\% | 3.1\% |
| SCG | 2007 | \$ 327.00 | \$ 4,621.00 | \$ 7,538.00 | \$ | 5,952.00 | 49.70\% | \$ | 25.37 | 116.67 | 10.80\% | 7.08\% | 61.30\% | 254.82\% | 11.05\% | 100.06\% | 102.35\% |  |
|  | 2008 | 353.00 | 5,319.00 | 8,305.00 |  | 7,519.00 | 40.50\% |  | 25.85 | 117.78 | 11.40\% | 6.64\% | 64.05\% | 272.72\% | 11.59\% | 99.98\% | 101.68\% | 10.2\% |
|  | 2009 | 357.00 | 4,237.00 | 9,009.00 |  | 7,891.00 | 43.20\% |  | 27.63 | 123.34 | 10.20\% | 8.43\% | 47.03\% | 264.28\% | 10.47\% | 99.97\% | 102.67\% | 8.5\% |
|  | 2010 | 376.00 | 4,601.00 | 9,662.00 |  | 7,854.00 | 47.10\% |  | 29.05 | 127.45 | 10.20\% | 8.17\% | 47.62\% | 261.19\% | 10.16\% | 100.09\% | 99.65\% | 7.2\% |
|  | 2011 | 387.00 | 4,409.00 | 10,047.00 |  | 8,511.00 | 45.70\% |  | 29.94 | 129.88 | 10.00\% | 8.78\% | 43.88\% | 258.31\% | 9.95\% | 99.98\% | 99.50\% | 4.0\% |
|  | 2012 | 420.00 | 4,176.00 | 10,896.00 |  | 9,103.00 | 45.60\% |  | 31.47 | 132.01 | 10.10\% | 10.06\% | 38.33\% | 262.49\% | 10.12\% | 100.08\% | 100.18\% | 8.5\% |
|  | 2013 | 471.00 | 4,495.00 | 11,643.00 |  | 10,059.00 | 46.40\% |  | 33.08 | 141.00 | 10.10\% | 10.48\% | 38.61\% | 249.45\% | 10.09\% | 99.93\% | 99.91\% | 6.9\% |
|  | 2014 | 538.00 | 4,951.00 | 12,232.00 |  | 10,518.00 | 47.40\% |  | 34.95 | 142.70 | 10.80\% | 10.87\% | 40.48\% | 245.35\% | 10.79\% | 100.04\% | 99.92\% | 5.1\% |
|  | 2015 | 544.00 | 4,380.00 | 13,425.00 |  | 11,325.00 | 48.10\% |  | 38.09 | 142.90 | 10.00\% | 12.42\% | 32.63\% | 246.45\% | 9.99\% | 99.92\% | 99.87\% | 9.8\% |
|  | 2019-2021 | 720.00 | 4,750.00 | 19,325.00 |  | 15,600.00 | 45.50\% |  | 47.75 | 148.00 | 10.00\% | 15.16\% | 24.58\% | 272.26\% | 10.14\% | 99.56\% | 101.44\% | 43.9\% |
| WEC |  | \$ 337.70 | \$ 4,237.80 | \$ 7,681.20 | \$ | 6,302.10 | 49.20\% | \$ | 13.25 | 233.89 | 10.90\% | 7.97\% | 55.17\% | 247.73\% | 10.89\% | 99.95\% | 99.92\% |  |
|  | 2008 | 359.80 | $4,431.00$ | 8,517.00 |  | 7,442.00 | 44.80\% |  | 14.27 | 233.84 | 10.70\% | 8.12\% | 52.03\% | 255.46\% | 10.79\% | 100.09\% | 100.86\% | 10.9\% |
|  | 2009 | 378.40 | 4,127.90 | 9,070.50 |  | 7,473.10 | 47.70\% |  | 15.26 | 233.82 | 10.60\% | 9.17\% | 45.51\% | 254.46\% | 10.62\% | 100.10\% | 100.14\% | 6.5\% |
|  | 2010 | 455.60 | 4,202.50 | 9,601.50 |  | 7,764.50 | 49.00\% |  | 16.26 | 233.77 | 12.00\% | 10.84\% | 43.77\% | 252.37\% | 11.97\% | 99.91\% | 99.79\% | 5.9\% |
|  | 2011 | 514.00 | 4,486.40 | 10,160.00 |  | 8,608.00 | 46.00\% |  | 17.20 | 230.49 | 12.90\% | 11.46\% | 44.16\% | 256.59\% | 12.98\% | 100.12\% | 100.63\% | 5.8\% |
|  | 2012 | 547.50 | 4,246.40 | 10,572.00 |  | 8,619.30 | 48.00\% |  | 18.05 | 229.04 | 13.20\% | 12.89\% | 40.17\% | 255.53\% | 13.23\% | 99.93\% | 100.25\% | 4.1\% |
|  | 2013 | 578.60 | 4,519.00 | 10,907.00 |  | 8,626.60 | 49.10\% |  | 18.73 | 225.96 | 13.60\% | 12.80\% | 41.43\% | 257.50\% | 13.66\% | 99.92\% | 100.44\% | 3.2\% |
|  | 2014 | 589.50 | 4,997.10 | 11,258.00 |  | 8,636.50 | 51.20\% |  | 19.60 | 225.52 | 13.30\% | 11.80\% | 44.39\% | 254.60\% | 13.33\% | 99.96\% | 100.24\% | 3.2\% |
|  | 2015 | 640.30 | 5,926.10 | 19,190.00 |  | 17,809.00 | 48.60\% |  | 27.42 | 315.68 | 7.40\% | 10.80\% | 30.88\% | 221.72\% | 7.40\% | 100.01\% | 99.97\% | 70.5\% |
|  | 2019-2021 | 1,135.00 | 8,550.00 | 24,350.00 |  | 19,775.00 | 52.00\% |  | 32.50 | 315.65 | 11.00\% | 13.27\% | 35.11\% | 236.80\% | 11.04\% | 99.76\% | 100.34\% | 26.9\% |
| XEL | 2007 | \$ 575.90 | \$ 10,034.00 | \$ 16,676.00 | \$ | 12,748.00 | 49.40\% | \$ | 14.70 | 428.78 | 9.10\% | 5.74\% | 60.17\% | 264.80\% | 9.14\% | 100.09\% | 100.49\% |  |
|  | 2008 | 645.70 | 11,203.00 | 17,689.00 |  | 14,800.00 | 47.10\% |  | 15.35 | 453.79 | 9.20\% | 5.76\% | 63.33\% | 253.76\% | 9.26\% | 99.93\% | 100.68\% | 6.1\% |
|  | 2009 | 685.50 | 9,644.30 | 18,508.00 |  | 15,277.00 | 47.70\% |  | 15.92 | 457.51 | 9.40\% | 7.11\% | 52.11\% | 253.98\% | 9.41\% | 99.95\% | 100.07\% | 4.6\% |
|  | 2010 | 727.00 | 10,311.00 | 20,663.00 |  | 17,452.00 | 46.30\% |  | 16.76 | 482.33 | 8.90\% | 7.05\% | 49.90\% | 255.72\% | 9.00\% | 100.04\% | 101.09\% | 11.6\% |
|  | 2011 | 841.40 | 10,655.00 | 22,353.00 |  | 17,331.00 | 48.90\% |  | 17.44 | 486.49 | 9.90\% | 7.90\% | 47.67\% | 263.76\% | 9.93\% | 100.11\% | 100.28\% | 8.2\% |
|  | 2012 | 905.20 | 10,128.00 | 23,809.00 |  | 19,018.00 | 46.70\% |  | 18.19 | 487.96 | 10.20\% | 8.94\% | 42.54\% | 268.08\% | 10.19\% | 99.94\% | 99.92\% | 6.5\% |
|  | 2013 | 948.20 | 10,915.00 | 26,122.00 |  | 20,477.00 | 46.70\% |  | 19.21 | 497.97 | 9.90\% | 8.69\% | 41.78\% | 273.16\% | 9.92\% | 100.03\% | 100.16\% | 9.7\% |
|  | 2014 | 1,021.30 | 11,686.00 | 28,757.00 |  | 21,714.00 | 47.00\% |  | 20.20 | 505.73 | 10.00\% | 8.74\% | 40.64\% | 281.78\% | 10.01\% | 100.10\% | 100.07\% | 10.1\% |
|  | 2015 | 1,063.60 | 11,024.00 | 31,206.00 |  | 23,092.00 | 45.90\% |  | 20.89 | 507.54 | 10.00\% | 9.65\% | 35.33\% | 294.42\% | 10.03\% | 100.03\% | 100.35\% | 8.5\% |
|  | 2019-2021 | 1,400.00 | 11,750.00 | 38,400.00 |  | 27,500.00 | 47.50\% |  | 25.50 | 508.00 | 11.00\% | 11.91\% | 30.60\% | 293.97\% | 10.72\% | 99.17\% | 97.43\% | 23.1\% |

Change in Net Plant and Asset Turnover
Proxy Group - Annual Average

|  |  | Average <br> Revenue/Net Plant | Change in Net <br> Plant | Cumulative Change <br> in Net Plant |
| :---: | :---: | :---: | :---: | :---: |
| 2008 | $63.32 \%$ | $10.79 \%$ | $10.79 \%$ |  |
|  | 2009 | $52.97 \%$ | $7.71 \%$ | $19.34 \%$ |
|  | 2010 | $52.45 \%$ | $6.88 \%$ | $27.55 \%$ |
|  | 2011 | $50.49 \%$ | $6.04 \%$ | $35.25 \%$ |
|  | 2012 | $44.56 \%$ | $6.24 \%$ | $43.69 \%$ |
| 2013 | $44.30 \%$ | $4.77 \%$ | $50.55 \%$ |  |
|  | 2014 | $42.53 \%$ | $9.78 \%$ | $65.28 \%$ |
| 2015 | $37.14 \%$ | $12.55 \%$ | $86.02 \%$ |  |
| 3-5 Year Projection | $35.92 \%$ | $25.28 \%$ | $133.04 \%$ |  |

Change in Net Plant and Asset Turnover
Proxy Group - Individual Company Results

| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ALE | 2007 | \$ | 841.70 | \$ | 1,104.50 | 76.21\% |  |  |
| ALE | 2008 | \$ | 801.00 | \$ | 1,387.30 | 57.74\% | 25.60\% | -24.23\% |
| ALE | 2009 | \$ | 759.10 | \$ | 1,622.70 | 46.78\% | 16.97\% | -18.98\% |
| ALE | 2010 | \$ | 907.00 | \$ | 1,805.60 | 50.23\% | 11.27\% | 7.38\% |
| ALE | 2011 | \$ | 928.20 | \$ | 1,982.70 | 46.81\% | 9.81\% | -6.80\% |
| ALE | 2012 | \$ | 961.20 | \$ | 2,347.60 | 40.94\% | 18.40\% | -12.54\% |
| ALE | 2013 | \$ | 1,018.40 | \$ | 2,576.50 | 39.53\% | 9.75\% | -3.46\% |
| ALE | 2014 | \$ | 1,136.80 | \$ | 3,286.40 | 34.59\% | 27.55\% | -12.49\% |
| ALE | 2015 | \$ | 1,486.40 | \$ | 3,669.10 | 40.51\% | 11.64\% | 17.11\% |
| ALE | 2019-2021 | \$ | 1,535.00 | \$ | 3,825.00 | 40.13\% | 4.25\% | -0.94\% |
| LNT | 2007 | \$ | 3,437.60 | \$ | 4,679.90 | 73.45\% |  |  |
| LNT | 2008 | \$ | 3,681.70 | \$ | 5,353.50 | 68.77\% | 14.39\% | -6.38\% |
| LNT | 2009 | \$ | 3,432.80 | \$ | 6,203.00 | 55.34\% | 15.87\% | -19.53\% |
| LNT | 2010 | \$ | 3,416.10 | \$ | 6,730.60 | 50.75\% | 8.51\% | -8.29\% |
| LNT | 2011 | \$ | 3,665.30 | \$ | 7,037.10 | 52.09\% | 4.55\% | 2.62\% |
| LNT | 2012 | \$ | 3,094.50 | \$ | 7,838.00 | 39.48\% | 11.38\% | -24.20\% |
| LNT | 2013 | \$ | 3,276.80 | \$ | 7,147.30 | 45.85\% | -8.81\% | 16.12\% |
| LNT | 2014 | \$ | 3,350.30 | \$ | 6,442.00 | 52.01\% | -9.87\% | 13.44\% |
| LNT | 2015 | \$ | 3,253.60 | \$ | 8,970.20 | 36.27\% | 39.25\% | -30.26\% |
| LNT | 2019-2021 | \$ | 4,000.00 | \$ | 8,800.00 | 45.45\% | -1.90\% | 25.32\% |
| AEP | 2007 | \$ | 13,380.00 | \$ | 29,870.00 | 44.79\% |  |  |
| AEP | 2008 | \$ | 14,440.00 | \$ | 32,987.00 | 43.77\% | 10.44\% | -2.28\% |


| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ALE | 2007 | \$ | 841.70 | \$ | 1,104.50 | 76.21\% |  |  |
| ALE | 2008 | \$ | 801.00 | \$ | 1,387.30 | 57.74\% | 25.60\% | -24.23\% |
| AEP | 2009 | \$ | 13,489.00 | \$ | 34,344.00 | 39.28\% | 4.11\% | -10.28\% |
| AEP | 2010 |  | 14,427.00 | \$ | 35,674.00 | 40.44\% | 3.87\% | 2.97\% |
| AEP | 2011 | \$ | 15,116.00 | \$ | 36,971.00 | 40.89\% | 3.64\% | 1.10\% |
| AEP | 2012 | \$ | 14,945.00 | \$ | 38,763.00 | 38.55\% | 4.85\% | -5.70\% |
| AEP | 2013 | \$ | 15,357.00 | \$ | 40,997.00 | 37.46\% | 5.76\% | -2.84\% |
| AEP | 2014 | \$ | 17,020.00 | \$ | 44,117.00 | 38.58\% | 7.61\% | 2.99\% |
| AEP | 2015 | \$ | 16,453.00 | \$ | 46,133.00 | 35.66\% | 4.57\% | -7.56\% |
| AEP | 2019-2021 | \$ | 17,500.00 | \$ | 64,000.00 | 27.34\% | 38.73\% | -23.33\% |
| AVA | 2007 | \$ | 1,417.80 | \$ | 2,351.30 | 60.30\% |  |  |
| AVA | 2008 | \$ | 1,676.80 | \$ | 2,492.20 | 67.28\% | 5.99\% | 11.58\% |
| AVA | 2009 | \$ | 1,512.60 | \$ | 2,607.00 | 58.02\% | 4.61\% | -13.76\% |
| AVA | 2010 | \$ | 1,558.70 | \$ | 2,714.20 | 57.43\% | 4.11\% | -1.02\% |
| AVA | 2011 | \$ | 1,619.80 | \$ | 2,860.80 | 56.62\% | 5.40\% | -1.41\% |
| AVA | 2012 | \$ | 1,547.00 | \$ | 3,023.70 | 51.16\% | 5.69\% | -9.64\% |
| AVA | 2013 | \$ | 1,618.50 | \$ | 3,202.40 | 50.54\% | 5.91\% | -1.22\% |
| AVA | 2014 | \$ | 1,472.60 | \$ | 3,620.00 | 40.68\% | 13.04\% | -19.51\% |
| AVA | 2015 | \$ | 1,484.80 | \$ | 3,898.60 | 38.09\% | 7.70\% | -6.38\% |
| AVA | 2019-2021 | \$ | 1,650.00 | \$ | 5,000.00 | 33.00\% | 28.25\% | -13.35\% |
| BKH | 2007 | \$ | 695.90 | \$ | 1,823.50 | 38.16\% |  |  |
| BKH | 2008 | \$ | 1,005.80 | \$ | 2,022.20 | 49.74\% | 10.90\% | 30.33\% |
| BKH | 2009 | \$ | 1,269.60 | \$ | 2,160.70 | 58.76\% | 6.85\% | 18.14\% |
| BKH | 2010 | \$ | 1,307.30 | \$ | 2,495.40 | 52.39\% | 15.49\% | -10.84\% |
| BKH | 2011 | \$ | 1,272.20 | \$ | 2,789.60 | 45.61\% | 11.79\% | -12.95\% |
| BKH | 2012 | \$ | 1,173.90 | \$ | 2,742.70 | 42.80\% | -1.68\% | -6.15\% |
| BKH | 2013 | \$ | 1,275.90 | \$ | 2,990.30 | 42.67\% | 9.03\% | -0.31\% |
| BKH | 2014 | \$ | 1,393.60 | \$ | 3,239.40 | 43.02\% | 8.33\% | 0.83\% |
| BKH | 2015 | \$ | 1,304.60 | \$ | 3,259.10 | 40.03\% | 0.61\% | -6.95\% |
| BKH | 2019-2021 | \$ | 2,050.00 | \$ | 5,075.00 | 40.39\% | 55.72\% | 0.91\% |
| CMS | 2007 | \$ | 6,519.00 | \$ | 8,728.00 | 74.69\% |  |  |
| CMS | 2008 | \$ | 6,821.00 | \$ | 9,190.00 | 74.22\% | 5.29\% | -0.63\% |
| CMS | 2009 | \$ | 6,205.00 | \$ | 9,682.00 | 64.09\% | 5.35\% | -13.65\% |
| CMS | 2010 | \$ | 6,432.00 | \$ | 10,069.00 | 63.88\% | 4.00\% | -0.33\% |
| CMS | 2011 | \$ | 6,503.00 | \$ | 10,633.00 | 61.16\% | 5.60\% | -4.26\% |
| CMS | 2012 | \$ | 6,312.00 | \$ | 11,551.00 | 54.64\% | 8.63\% | -10.65\% |
| CMS | 2013 | \$ | 6,566.00 | \$ | 12,246.00 | 53.62\% | 6.02\% | -1.88\% |
| CMS | 2014 | \$ | 7,179.00 | \$ | 13,412.00 | 53.53\% | 9.52\% | -0.17\% |
| CMS | 2015 | \$ | 6,456.00 | \$ | 14,705.00 | 43.90\% | 9.64\% | -17.98\% |
| CMS | 2019-2021 | \$ | 7,150.00 | \$ | 18,600.00 | 38.44\% | 26.49\% | -12.44\% |
| DTE | 2007 | \$ | 8,861.00 | \$ | 11,408.00 | 77.67\% |  |  |
| DTE | 2008 | \$ | 9,329.00 | \$ | 12,231.00 | 76.27\% | 7.21\% | -1.80\% |
| DTE | 2009 | \$ | 8,014.00 | \$ | 12,431.00 | 64.47\% | 1.64\% | -15.48\% |
| DTE | 2010 | \$ | 8,557.00 | \$ | 12,992.00 | 65.86\% | 4.51\% | 2.17\% |
| DTE | 2011 | \$ | 8,897.00 | \$ | 13,746.00 | 64.72\% | 5.80\% | -1.73\% |
| DTE | 2012 | \$ | 8,791.00 | \$ | 14,684.00 | 59.87\% | 6.82\% | -7.50\% |
| DTE | 2013 | \$ | 9,661.00 | \$ | 15,800.00 | 61.15\% | 7.60\% | 2.13\% |


| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ALE | 2007 | \$ | 841.70 | \$ | 1,104.50 | 76.21\% |  |  |
| ALE | 2008 | \$ | 801.00 | \$ | 1,387.30 | 57.74\% | 25.60\% | -24.23\% |
| DTE | 2014 | \$ | 12,301.00 | \$ | 16,820.00 | 73.13\% | 6.46\% | 19.61\% |
| DTE | 2015 | \$ | 10,337.00 | \$ | 18,034.00 | 57.32\% | 7.22\% | -21.62\% |
| DTE | 2019-2021 | \$ | 13,250.00 | \$ | 26,200.00 | 50.57\% | 45.28\% | -11.77\% |
| IDA | 2007 | \$ | 879.40 | \$ | 2,616.60 | 33.61\% |  |  |
| IDA | 2008 | \$ | 960.40 | \$ | 2,758.20 | 34.82\% | 5.41\% | 3.60\% |
| IDA | 2009 | \$ | 1,049.80 | \$ | 2,917.00 | 35.99\% | 5.76\% | 3.36\% |
| IDA | 2010 | \$ | 1,036.00 | \$ | 3,161.40 | 32.77\% | 8.38\% | -8.94\% |
| IDA | 2011 | \$ | 1,026.80 | \$ | 3,406.60 | 30.14\% | 7.76\% | -8.02\% |
| IDA | 2012 | \$ | 1,080.70 | \$ | 3,536.00 | 30.56\% | 3.80\% | 1.40\% |
| IDA | 2013 | \$ | 1,246.20 | \$ | 3,665.00 | 34.00\% | 3.65\% | 11.26\% |
| IDA | 2014 | \$ | 1,282.50 | \$ | 3,833.50 | 33.46\% | 4.60\% | -1.61\% |
| IDA | 2015 | \$ | 1,270.30 | \$ | 3,992.40 | 31.82\% | 4.15\% | -4.89\% |
| IDA | 2019-2021 | \$ | 1,350.00 | \$ | 4,675.00 | 28.88\% | 17.10\% | -9.24\% |
| NWE | 2007 | \$ | 1,200.10 | \$ | 1,770.90 | 67.77\% |  |  |
| NWE | 2008 | \$ | 1,260.80 | \$ | 1,839.70 | 68.53\% | 3.89\% | 1.13\% |
| NWE | 2009 | \$ | 1,141.90 | \$ | 1,964.10 | 58.14\% | 6.76\% | -15.17\% |
| NWE | 2010 | \$ | 1,110.70 | \$ | 2,118.00 | 52.44\% | 7.84\% | -9.80\% |
| NWE | 2011 | \$ | 1,117.30 | \$ | 2,213.30 | 50.48\% | 4.50\% | -3.74\% |
| NWE | 2012 | \$ | 1,070.30 | \$ | 2,435.60 | 43.94\% | 10.04\% | -12.95\% |
| NWE | 2013 | \$ | 1,154.50 | \$ | 2,690.10 | 42.92\% | 10.45\% | -2.34\% |
| NWE | 2014 | \$ | 1,204.90 | \$ | 3,758.00 | 32.06\% | 39.70\% | -25.29\% |
| NWE | 2015 | \$ | 1,214.30 | \$ | 4,059.50 | 29.91\% | 8.02\% | -6.70\% |
| NWE | 2019-2021 | \$ | 1,485.00 | \$ | 4,850.00 | 30.62\% | 19.47\% | 2.36\% |
| OGE | 2007 |  | 3,797.60 | \$ | 4,246.30 | 89.43\% |  |  |
| OGE | 2008 |  | 4,070.70 | \$ | 5,249.80 | 77.54\% | 23.63\% | -13.30\% |
| OGE | 2009 | \$ | 2,869.70 | \$ | 5,911.60 | 48.54\% | 12.61\% | -37.40\% |
| OGE | 2010 | \$ | 3,716.90 | \$ | 6,464.40 | 57.50\% | 9.35\% | 18.45\% |
| OGE | 2011 | \$ | 3,915.90 | \$ | 7,474.00 | 52.39\% | 15.62\% | -8.88\% |
| OGE | 2012 | \$ | 3,671.20 | \$ | 8,344.80 | 43.99\% | 11.65\% | -16.03\% |
| OGE | 2013 |  | 2,867.70 | \$ | 6,672.80 | 42.98\% | -20.04\% | -2.31\% |
| OGE | 2014 | \$ | 2,453.10 | \$ | 6,979.90 | 35.15\% | 4.60\% | -18.22\% |
| OGE | 2015 | \$ | 2,196.90 | \$ | 7,322.40 | 30.00\% | 4.91\% | -14.63\% |
| OGE | 2019-2021 | \$ | 2,600.00 | \$ | 8,825.00 | 29.46\% | 20.52\% | -1.80\% |
| OTTR | 2007 | \$ | 1,238.90 | \$ | 854.00 | 145.07\% |  |  |
| OTTR | 2008 | \$ | 1,311.20 | \$ | 1,037.60 | 126.37\% | 21.50\% | -12.89\% |
| OTTR | 2009 | \$ | 1,039.50 | \$ | 1,098.60 | 94.62\% | 5.88\% | -25.12\% |
| OTTR | 2010 | \$ | 1,119.10 | \$ | 1,108.70 | 100.94\% | 0.92\% | 6.68\% |
| OTTR | 2011 | \$ | 1,077.90 | \$ | 1,077.50 | 100.04\% | -2.81\% | -0.89\% |
| OTTR | 2012 | \$ | 859.20 | \$ | 1,049.50 | 81.87\% | -2.60\% | -18.16\% |
| OTTR | 2013 | \$ | 893.30 | \$ | 1,167.00 | 76.55\% | 11.20\% | -6.50\% |
| OTTR | 2014 | \$ | 799.30 | \$ | 1,268.50 | 63.01\% | 8.70\% | -17.68\% |
| OTTR | 2015 | \$ | 779.80 | \$ | 1,387.80 | 56.19\% | 9.40\% | -10.83\% |
| OTTR | 2019-2021 | \$ | 1,050.00 | \$ | 1,900.00 | 55.26\% | 36.91\% | -1.65\% |
| PNW | 2007 | \$ | 3,523.60 | \$ | 8,436.40 | 41.77\% |  |  |
| PNW | 2008 | \$ | 3,367.10 | \$ | 8,916.70 | 37.76\% | 5.69\% | -9.59\% |
| PNW | 2009 | \$ | 3,297.10 | \$ | 9,257.80 | 35.61\% | 3.83\% | -5.69\% |
| PNW | 2010 | \$ | 3,263.60 | \$ | 9,578.80 | 34.07\% | 3.47\% | -4.33\% |
| PNW | 2011 | \$ | 3,241.40 | \$ | 9,962.30 | 32.54\% | 4.00\% | -4.50\% |
| PNW | 2012 | \$ | 3,301.80 | \$ | 10,396.00 | 31.76\% | 4.35\% | -2.39\% |
| PNW | 2013 | \$ | 3,454.60 | \$ | 10,889.00 | 31.73\% | 4.74\% | -0.11\% |
| PNW | 2014 | \$ | 3,491.60 | \$ | 11,194.00 | 31.19\% | 2.80\% | -1.68\% |
| PNW | 2015 | \$ | 3,495.40 | \$ | 11,809.00 | 29.60\% | 5.49\% | -5.10\% |
| PNW | 2019-2021 | \$ | 4,250.00 | \$ | 14,575.00 | 29.16\% | 23.42\% | -1.49\% |
| PNM | 2007 | \$ | 1,914.00 | \$ | 2,935.40 | 65.20\% |  |  |
| PNM | 2008 | \$ | 1,959.50 | \$ | 3,192.00 | 61.39\% | 8.74\% | -5.85\% |
| PNM | 2009 | \$ | 1,647.70 | \$ | 3,332.40 | 49.44\% | 4.40\% | -19.45\% |
| PNM | 2010 | \$ | 1,673.50 | \$ | 3,444.40 | 48.59\% | 3.36\% | -1.74\% |
| PNM | 2011 | \$ | 1,700.60 | \$ | 3,627.10 | 46.89\% | 5.30\% | -3.50\% |
| PNM | 2012 | \$ | 1,342.40 | \$ | 3,746.50 | 35.83\% | 3.29\% | -23.58\% |
| PNM | 2013 |  | 1,387.90 | \$ | 3,933.90 | 35.28\% | 5.00\% | -1.54\% |
| PNM | 2014 | \$ | 1,435.90 | \$ | 4,270.00 | 33.63\% | 8.54\% | -4.68\% |
| PNM | 2015 | \$ | 1,439.10 | \$ | 4,535.40 | 31.73\% | 6.22\% | -5.64\% |
| PNM | 2019-2021 | \$ | 1,625.00 | \$ | 5,270.00 | 30.83\% | 16.20\% | -2.82\% |


|  |  |  |  |  |  |  |  |
| :--- | ---: | :--- | ---: | :--- | ---: | :--- | ---: |
| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | | Change in Revenue/Net |
| :--- |
| Plant |


| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ALE | 2007 | \$ | 841.70 | \$ | 1,104.50 | 76.21\% |  |  |
| ALE | 2008 | \$ | 801.00 | \$ | 1,387.30 | 57.74\% | 25.60\% | -24.23\% |
| XEL | 2011 | \$ | 10,655.00 | \$ | 22,353.00 | 47.67\% | 8.18\% | -4.48\% |
| XEL | 2012 | \$ | 10,128.00 | \$ | 23,809.00 | 42.54\% | 6.51\% | -10.76\% |
| XEL | 2013 | \$ | 10,915.00 | \$ | 26,122.00 | 41.78\% | 9.71\% | -1.77\% |
| XEL | 2014 | \$ | 11,686.00 | \$ | 28,757.00 | 40.64\% | 10.09\% | -2.75\% |
| XEL | 2015 | \$ | 11,024.00 | \$ | 31,206.00 | 35.33\% | 8.52\% | -13.07\% |
| XEL | 2019-2021 | \$ | 11,750.00 | \$ | 38,400.00 | 30.60\% | 23.05\% | -13.38\% |

Source: Value Line Investment Reports as of December 16, 2016

Change in Net Plant and Asset Turnover
Regression Analysis

SUMMARY OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.420139014 |
| R Square | 0.176516791 |
| Adjusted R Square | 0.171370021 |
| Standard Error | 0.103002572 |
| Observations | 162 |

ANOVA

|  | $d f$ |  | SS | MS | $F$ |
| :--- | ---: | ---: | ---: | ---: | ---: |
| Regression | 1 | 0.363870959 | 0.363870959 | 34.29661502 | $2.60895 \mathrm{E}-08$ |
| Residual | 160 | 1.697524768 | 0.01060953 |  |  |
| Total | 161 | 2.061395727 |  |  |  |


|  | Coefficients | Standard Error | $t$ Stat | P-value | Lower 95\% | Upper 95\% |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: |
| Intercept | -0.01354872 | 0.010783158 | -1.256470494 | 0.210776805 | -0.034844397 | 0.007746956 |
| Change in Net Plant | -0.422043209 | 0.072066144 | -5.856331191 | $2.60895 \mathrm{E}-08$ | -0.564366749 | -0.279719668 |


| Company | Ticker | Trailing P/E | P/E | Forecasted P/E | Percent Change Trailing to Forecast | Percent Change to Forecast |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ALLETE, Inc. | ALE | 20.40 | 21.40 | 15.00 | -26\% | -30\% |
| Alliant Energy Corporation | LNT | 20.50 | 22.10 | 15.00 | -27\% | -32\% |
| Ameren Corporation | AEE | 18.40 | 17.90 | 15.00 | -18\% | -16\% |
| American Electric Power Company, Inc. | AEP | 15.30 | 14.50 | 14.50 | -5\% | 0\% |
| Avista Corporation | AVA | 19.50 | 19.60 | 15.00 | -23\% | -23\% |
| Black Hills Corporation | BKH | 23.90 | 21.00 | 15.00 | -37\% | -29\% |
| CMS Energy Corporation | CMS | 18.80 | 19.40 | 15.00 | -20\% | -23\% |
| Consolidated Edison, Inc. | ED | 19.30 | 18.50 | 16.00 | -17\% | -14\% |
| Dominion Resources, Inc. | D | 22.80 | 19.20 | 17.50 | -23\% | -9\% |
| DTE Energy Co. | DTE | 19.30 | 18.20 | 15.00 | -22\% | -18\% |
| Duke Energy Corporation | DUK | 19.10 | 17.90 | 17.50 | -8\% | -2\% |
| Edison International | EIX | 19.20 | 18.10 | 15.00 | -22\% | -17\% |
| El Paso Electric Company | EE | 23.90 | 17.90 | 17.00 | -29\% | -5\% |
| Entergy Corporation | ETR | 8.60 | 15.70 | 14.50 | 69\% | -8\% |
| Eversource Energy | ES | 19.60 | 17.50 | 16.00 | -18\% | -9\% |
| FirstEnergy Corp. | FE | 16.70 | 17.80 | 14.50 | -13\% | -19\% |
| IDACORP, Inc. | IDA | 20.40 | 18.90 | 15.00 | -26\% | -21\% |
| MGE Energy, Inc. | MGEE | 29.10 | 26.20 | 15.00 | -48\% | -43\% |
| NorthWestern Corporation | NWE | 16.60 | 15.10 | 14.00 | -16\% | -7\% |
| OGE Energy Corp. | OGE | 20.70 | 16.30 | 18.00 | -13\% | 10\% |
| Otter Tail Corporation | OTTR | 24.80 | 24.60 | 18.00 | -27\% | -27\% |
| PG\&E Corporation | PCG | 38.60 | 17.30 | 14.50 | -62\% | -16\% |
| Pinnacle West Capital Corporation | PNW | 19.80 | 18.30 | 15.50 | -22\% | -15\% |
| PNM Resources, Inc. | PNM | NMF | 18.90 | 16.00 | N/A | -15\% |
| Portland General Electric Company | POR | 20.20 | 18.80 | 14.00 | -31\% | -26\% |
| PPL Corporation | PPL | 12.80 | 14.60 | 16.00 | 25\% | 10\% |
| SCANA Corporation | SCG | 18.40 | 17.50 | 14.50 | -21\% | -17\% |
| Southern Company | SO | 17.40 | 18.30 | 15.00 | -14\% | -18\% |
| Wisconsin Energy Corporation | WEC | 19.00 | 18.20 | 16.50 | -13\% | -9\% |
| Xcel Energy Inc. | XEL | 19.20 | 17.90 | 15.50 | -19\% | -13\% |

Source: Value Line as of December 30, 2016

|  |  |  |
| :--- | :--- | ---: |
| Line Description | IMPLIED GROWTH RATE AT ALLOWED ROE: |  |
| Input | Dividend Yield | $3.28 \%$ [1] |
| Assumes g = Allowed ROE - Div. Yield | Assumed Growth Rate | $5.74 \% \%$ |
| Input | Total Return | $9.02 \%[1]$ |
| Input | Payout Ratio | $67.50 \%[2]$ |
| Input | Book Value/Share | $20[2]$ |




| CASE 2 | 10-YEAR HOLDING PERIOD |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Present Value of Dividend |  | \$ 1.15 | \$ |  | \$ | 1.08 | \$ | 1.05 | \$ | 1.01 | \$ | \$ 0.98 | \$ | 0.95 |  | \$ 0.92 | \$ | 0.90 |
| Present Value Factor for the period |  | \$ 1.18 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Present value of Stock Price obtained by multiplying nominal Stock Price by the Present Value Factor for the 10th Period (Terminal Value) | Present Value of Stock Price | -- | -- |  | -- |  | -- |  | -- |  | -- |  | - |  | -- |  | -- |  | 28.88 |
| Value of dividends = sum of all Present Value Dividends for periods 1-10 | Value of Dividends | \$ 10.33 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Present value of Stock Price obtained by multiplying nominal Stock Price by the Present Value Factor for the 10th Period (Terminal Value) Total Value of investment sum of all Present Value Dividends for periods | Value of Stock Price | \$ 28.88 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1-10 and Present Value of Stock in period 10 (Terminal Value) | Value of Investment | \$ 39.22 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |


| CASE 3 | 5-YEAR HOLDING PERIOD |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Present value of Div/S obtained by multiplying nominal Div/S by the 5-YEAR HOLDING PERIOD |  |  |  |  |  |  |  |  |  |  |  |
| Present Value Factor for the period | Present Value of Dividend | \$ | 1.18 | \$ | 1.15 | \$ | 1.11 | \$ | 1.08 | \$ | 1.05 |
| Present value of Stock Price obtained by multiplying nominal Stock Price by the Present Value Factor for the 5th Period (Terminal Value) | Present Value of Stock Price |  | - |  | -- |  | -- |  | - |  | 33.66 |
| Value of dividends = sum of all Present Value Dividends for periods 1-5 | Value of Dividends | \$ | 5.56 |  |  |  |  |  |  |  |  |
| Present value of Stock Price obtained by multiplying nominal Stock Price |  |  |  |  |  |  |  |  |  |  |  |
| by the Present Value Factor for the 5th Period (Terminal Value) <br> Total Value of investment sum of all Present Value Dividends for periods | Value of Stock Price |  | 33.66 |  |  |  |  |  |  |  |  |
| 1-5 and Present Value of Stock in period 5 (Terminal Value) | Value of Investment |  | 39.22 |  |  |  |  |  |  |  |  |

[1] Source: Rebuttal Schedule 1. Note, for purposes of this exhibit, these data are illustrative only.
[2] Note: Illustrative only.

Growth Rate Regression Analysis
$\left.\begin{array}{lcccccccc}\hline & & & & \begin{array}{c}\text { Past 10 Year } \\ \text { Dividend }\end{array} & \begin{array}{c}\text { Past 5 Year } \\ \text { Dividend } \\ \text { Growth Rate }\end{array} & \begin{array}{c}\text { Proj. } \\ \text { Earnings } \\ \text { Growth Rate }\end{array} & \begin{array}{c}\text { Proj. } \\ \text { Gividend } \\ \text { Growth Rate }\end{array} & \begin{array}{c}\text { Retention } \\ \text { Growth Rate }\end{array} \\ \text { Value Growth } \\ \text { Rate }\end{array}\right]$

## Notes:

Source: Value Line Reports as of December 30, 2016.

## SUMMARY OUTPUT

| Regression Statistics |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Multiple R | 0.10197601 |  |  |  |  |  |  |  |
| R Square | 0.010399107 |  |  |  |  |  |  |  |
| Adjusted R Square | -0.032627019 |  |  |  |  |  |  |  |
| Standard Error | 2.094914039 |  |  |  |  |  |  |  |
| Observations | 25 |  |  |  |  |  |  |  |
| ANOVA |  |  |  |  |  |  |  |  |
|  | $d f$ | SS | MS | F | Significance F |  |  |  |
| Regression | 1 | 1.060708865 | 1.060708865 | 0.24169284 | 0.627645232 |  |  |  |
| Residual | 23 | 100.9392911 | 4.388664832 |  |  |  |  |  |
| Total | 24 | 102 |  |  |  |  |  |  |
|  | Coefficients | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| Intercept | 15.82965807 | 0.627510272 | 25.22613377 | 2.90682E-18 | 14.53155417 | 17.12776197 | 14.53155417 | 17.12776197 |
| Past 10 YearDividendGrowth Rate | -4.865636997 | 9.897096686 | -0.49162266 | 0.627645232 | -25.33934138 | 15.60806738 | -25.33934138 | 15.60806738 |

SUMMARY OUTPUT

| Regression Statistics |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Multiple R | 0.029900761 |  |  |  |  |  |  |  |
| R Square | 0.000894055 |  |  |  |  |  |  |  |
| Adjusted R Square | -0.037533096 |  |  |  |  |  |  |  |
| Standard Error | 1.986364781 |  |  |  |  |  |  |  |
| Observations | 28 |  |  |  |  |  |  |  |
| ANOVA |  |  |  |  |  |  |  |  |
|  | $d f$ | SS | MS | F | Significance $F$ |  |  |  |
| Regression | 1 | 0.091800341 | 0.091800341 | 0.023266244 | 0.879944306 |  |  |  |
| Residual | 26 | 102.5867711 | 3.945645042 |  |  |  |  |  |
| Total | 27 | 102.6785714 |  |  |  |  |  |  |
|  | Coefficients | Standard Error | t Stat | $P$-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| Intercept | 15.55659201 | 0.500747771 | 31.0667224 | 4.37044E-22 | 14.52729022 | 16.58589379 | 14.52729022 | 16.58589379 |
| Past 5 YearDividend Growth Rate | 1.132339003 | 7.423578868 | 0.152532764 | 0.879944306 | -14.1270459 | 16.39172391 | -14.1270459 | 16.39172391 |

## SUMMARY OUTPUT

|  | Regression Statistics |
| :--- | ---: |
| Multiple R | 0.493065167 |
| R Square | 0.243113258 |
| Adjusted R Square | 0.21400223 |
| Standard Error | 1.709847656 |
| Observations | 28 |

ANOVA

|  | $d f$ | SS | MS | $F$ | Significance F |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Regression | 1 | 24.41551724 | 24.41551724 | 8.351242495 | 0.007676625 |  |  |  |
| Residual | 26 | 76.01305419 | 2.923579007 |  |  |  |  |  |
| Total | 27 | 100.4285714 |  |  |  |  |  |  |
|  | Coefficients | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| Intercept | 13.38596059 | 0.845181995 | 15.83796232 | 7.17393E-15 | 11.64866412 | 15.12325706 | 11.64866412 | 15.12325706 |
| Proj.EarningsGrowth Rate | 41.03448276 | 14.19951191 | 2.889851639 | 0.007676625 | 11.84696802 | 70.2219975 | 11.84696802 | 70.2219975 |

## SUMMARY OUTPUT

| Regression Statistics |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Multiple R | 0.222533657 |  |  |  |  |  |  |  |
| R Square | 0.049521229 |  |  |  |  |  |  |  |
| Adjusted R Square | 0.014318311 |  |  |  |  |  |  |  |
| Standard Error | 1.904498462 |  |  |  |  |  |  |  |
| Observations | 29 |  |  |  |  |  |  |  |
| ANOVA |  |  |  |  |  |  |  |  |
|  | $d f$ | SS | MS | $F$ | Significance $F$ |  |  |  |
| Regression | 1 | 5.102394173 | 5.102394173 | 1.406736491 | 0.245931744 |  |  |  |
| Residual | 27 | 97.93208859 | 3.627114392 |  |  |  |  |  |
| Total | 28 | 103.0344828 |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  | Coefficients | Standard Error | t Stat | $P$-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| Intercept | 16.60024738 | 0.925224305 | 17.94186263 | 1.56766E-16 | 14.70184392 | 18.49865084 | 14.70184392 | 18.49865084 |
| Proj.Dividend Growth Rate | -18.67122158 | 15.74223373 | -1.186059228 | 0.245931744 | -50.97161715 | 13.62917399 | -50.97161715 | 13.62917399 |

## SUMMARY OUTPUT

| Regression Statistics |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Multiple R | 0.02565887 |  |  |  |  |  |  |  |
| R Square | 0.000658378 |  |  |  |  |  |  |  |
| Adjusted R Square | -0.036354275 |  |  |  |  |  |  |  |
| Standard Error | 1.952838837 |  |  |  |  |  |  |  |
| Observations | 29 |  |  |  |  |  |  |  |
| ANOVA |  |  |  |  |  |  |  |  |
|  | $d f$ | SS | MS | $F$ | Significance F |  |  |  |
| Regression | 1 | 0.067835597 | 0.067835597 | 0.017787907 | 0.894888833 |  |  |  |
| Residual | 27 | 102.9666472 | 3.813579525 |  |  |  |  |  |
| Total | 28 | 103.0344828 |  |  |  |  |  |  |
|  | Coefficients | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| Intercept | 15.39262727 | 1.496049071 | 10.28885186 | 7.68054E-11 | 12.32298813 | 18.4622664 | 12.32298813 | 18.4622664 |
| Proj. Retention Growth Rate | 4.79812756 | 35.97570961 | 0.133371311 | 0.894888837 | -69.01793127 | 78.61418639 | -69.01793127 | 78.61418639 |

## SUMMARY OUTPUT

|  | Regression Statistics |
| :--- | ---: | ---: |
| Multiple R | 0.290335704 |
| R Square | 0.084294821 |
| Adjusted R Square | 0.049075391 |
| Standard Error | 1.880701209 |
| Observations | 28 |


| ANOVA | df |  | SS | $M S$ | $F$ | Significance $F$ |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
|  |  | 1 | 8.465608466 | 8.465608466 | 2.3934181 | 0.13393386 |
| Regression |  | 26 | 91.96296296 | 3.537037037 |  |  |
| Residual | 27 | 100.4285714 |  |  |  |  |
| Total |  |  |  |  |  |  |


|  | Coefficients | Standard Error | $t$ Stat | P-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| Intercept | 13.84391534 | 1.215912847 | 11.38561483 | $1.33128 \mathrm{E}-11$ | 11.34457069 | 16.34326 | 11.34457069 | 16.34326 |
| Proj. Book Value Growth Rate | 42.32804233 | 27.36017666 | 1.547067581 | 0.133933865 | -13.91160625 | 98.56769091 | -13.91160625 | 98.56769091 |

## SUMMARY OUTPUT

|  | Regression Statistics |
| :--- | ---: |
| Multiple R | 0.821828243 |
| R Square | 0.67540166 |
| Adjusted R Square | 0.560837541 |
| Standard Error | 1.37719739 |
| Observations | 24 |


| ANOVA | $d f$ |  |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
|  |  |  | $M S$ | $F$ | Significance $F$ |  |
| Regression |  | 17 | 67.08989827 | 11.18164971 | 5.89540304 | 0.001766572 |
| Residual | 23 | 32.24343506 | 1.896672651 |  |  |  |
| Total | 99.33333333 |  |  |  |  |  |


|  | Coefficients | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Intercept | 14.68170762 | 1.324551307 | 11.0842876 | 3.3554E-09 | 11.88714864 | 17.4762666 | 11.88714864 | 17.4762666 |
| Past 10 YearDividendGrowth Rate | -4.920279302 | 9.525687694 | -0.516527463 | 0.612140048 | -25.01772359 | 15.17716498 | -25.01772359 | 15.17716498 |
| Past 5 YearDividend Growth Rate | 2.832586975 | 10.89469328 | 0.259996946 | 0.797988876 | -20.15320662 | 25.81838057 | -20.15320662 | 25.81838057 |
| Proj.EarningsGrowth Rate | 76.3642636 | 16.71219817 | 4.569372792 | 0.000272268 | 41.10460757 | 111.6239196 | 41.10460757 | 111.6239196 |
| Proj.Dividend Growth Rate | -43.0131451 | 15.38777734 | -2.795279926 | 0.012428216 | -75.47851744 | -10.54777276 | -75.47851744 | -10.54777276 |
| Proj. Retention Growth Rate | -74.0722657 | 33.59466454 | -2.204881838 | 0.041523803 | -144.9508123 | -3.193719114 | -144.9508123 | -3.193719114 |
| Proj. Book Value Growth Rate | 55.17593309 | 27.59776794 | 1.999289696 | 0.061822038 | -3.050267627 | 113.4021338 | -3.050267627 | 113.4021338 |

Analysts' Projected EPS Growth Rates - Woolridge Proxy Group as Filed

| Company | Ticker | Yahoo | Reuters | Zacks | Mean |
| :--- | :---: | :---: | :---: | :---: | :---: |
| ALLETE, Inc. | ALE | $5.0 \%$ | $5.0 \%$ | $5.5 \%$ | $5.2 \%$ |
| Alliant Energy Corporation | LNT | $6.6 \%$ | $6.6 \%$ | $6.1 \%$ | $6.4 \%$ |
| Ameren Corporation | AEE | $5.6 \%$ | $5.6 \%$ | $6.1 \%$ | $5.8 \%$ |
| American Electric Power Company, Inc. | AEP | $1.9 \%$ | $1.9 \%$ | $5.4 \%$ | $3.1 \%$ |
| Avista Corporation | AVA | $5.7 \%$ | NA | $5.3 \%$ | $5.5 \%$ |
| Black Hills Corporation | BKH | $6.7 \%$ | $6.7 \%$ | $5.8 \%$ | $6.4 \%$ |
| CMS Energy Corporation | CMS | $7.3 \%$ | $7.3 \%$ | $6.6 \%$ | $7.1 \%$ |
| Consolidated Edison, Inc. | ED | $2.1 \%$ | $2.1 \%$ | $2.8 \%$ | $2.3 \%$ |
| Dominion Resources, Inc. | D | $5.8 \%$ | $5.8 \%$ | $5.9 \%$ | $5.8 \%$ |
| DTE Energy Company | DTE | $5.6 \%$ | $5.6 \%$ | $5.8 \%$ | $5.7 \%$ |
| Duke Energy Corporation | DUK | $3.5 \%$ | $3.5 \%$ | $4.7 \%$ | $3.9 \%$ |
| Edison International | EIX | $1.9 \%$ | $1.9 \%$ | $5.3 \%$ | $3.0 \%$ |
| EI Paso Electric Company | EE | $7.0 \%$ | NA | $4.4 \%$ | $5.7 \%$ |
| Entergy Corporation | ETR | $-8.3 \%$ | $-8.3 \%$ | $-4.8 \%$ | $-7.1 \%$ |
| Eversource Energy | ES | $6.3 \%$ | $6.3 \%$ | $6.1 \%$ | $6.2 \%$ |
| FirstEnergy Corp. | FE | $-5.3 \%$ | $-5.3 \%$ | $-0.4 \%$ | $-3.7 \%$ |
| IDACORP, Inc. | IDA | $4.1 \%$ | $4.1 \%$ | $4.4 \%$ | $4.2 \%$ |
| MGE Energy, Inc. | MGEE | $4.0 \%$ | NA | NA | $4.0 \%$ |
| NorthWestern Corporation | NWE | $4.5 \%$ | $4.5 \%$ | $5.0 \%$ | $4.7 \%$ |
| OGE Energy Corp. | OGE | $4.0 \%$ | $4.0 \%$ | $5.2 \%$ | $4.4 \%$ |
| Otter Tail Corporation | OTTR | $6.0 \%$ | NA | NA | $6.0 \%$ |
| PG\&E Corporation | PCG | $5.6 \%$ | $5.6 \%$ | $4.3 \%$ | $5.2 \%$ |
| Pinnacle West Capital Corporation | PNW | $4.5 \%$ | $4.5 \%$ | $4.5 \%$ | $4.5 \%$ |
| PNM Resources, Inc. | PNM | $6.9 \%$ | $6.9 \%$ | $6.8 \%$ | $6.9 \%$ |
| Portland General Electric Company | POR | $6.2 \%$ | $6.2 \%$ | $6.2 \%$ | $6.2 \%$ |
| PPL Corporation | PPL | $2.4 \%$ | $2.4 \%$ | $3.5 \%$ | $2.8 \%$ |
| SCANA Corporation | SCG | $6.3 \%$ | $6.5 \%$ | $5.5 \%$ | $6.1 \%$ |
| Southern Company | SO | $3.3 \%$ | $3.8 \%$ | $3.9 \%$ | $3.7 \%$ |
| WEC Energy Group, Inc. | WEC | $7.0 \%$ | $6.8 \%$ | $6.2 \%$ | $6.7 \%$ |
| Xcel Energy Inc. | XEL | $5.7 \%$ | $5.3 \%$ | $5.4 \%$ | $5.5 \%$ |
| Average |  | $4.3 \%$ | $4.1 \%$ | $4.7 \%$ | $4.4 \%$ |
| Median |  | $5.6 \%$ | $5.2 \%$ | $5.4 \%$ | $5.3 \%$ |
|  |  |  |  |  |  |

Source: Exhibit JRW-10, Page 5

Analysts' Projected EPS Growth Rates - Woolridge Proxy Group Corrected

| Company | Ticker | Yahoo | Reuters | Zacks | Mean |
| :---: | :---: | :---: | :---: | :---: | :---: |
| ALLETE, Inc. | ALE | 5.0\% | 5.0\% | 5.5\% | 5.2\% |
| Alliant Energy Corporation | LNT | 6.6\% | 6.6\% | 6.1\% | 6.4\% |
| Ameren Corporation | AEE | 5.6\% | 5.6\% | 6.1\% | 5.8\% |
| American Electric Power Company, Inc. | AEP | 1.9\% | 1.9\% | 5.4\% | 3.1\% |
| Avista Corporation | AVA | 5.7\% | NA | 5.3\% | 5.5\% |
| Black Hills Corporation | BKH | 6.7\% | 6.7\% | 5.8\% | 6.4\% |
| CMS Energy Corporation | CMS | 7.3\% | 7.3\% | 6.6\% | 7.1\% |
| Consolidated Edison, Inc. | ED | 2.1\% | 2.1\% | 2.8\% | 2.3\% |
| Dominion Resources, Inc. | D | 5.8\% | 5.8\% | 5.9\% | 5.8\% |
| DTE Energy Company | DTE | 5.6\% | 5.6\% | 5.8\% | 5.7\% |
| Duke Energy Corporation | DUK | 3.5\% | 3.5\% | 4.7\% | 3.9\% |
| Edison International | EIX | 1.9\% | 1.9\% | 5.3\% | 3.0\% |
| El Paso Electric Company | EE | 7.0\% | NA | 4.4\% | 5.7\% |
| Entergy Corporation | ETR | NA | NA | NA | NA |
| Eversource Energy | ES | 6.3\% | 6.3\% | 6.1\% | 6.2\% |
| FirstEnergy Corp. | FE | NA | NA | NA | NA |
| IDACORP, Inc. | IDA | 4.1\% | 4.1\% | 4.4\% | 4.2\% |
| MGE Energy, Inc. | MGEE | 4.0\% | NA | NA | 4.0\% |
| NorthWestern Corporation | NWE | 4.5\% | 4.5\% | 5.0\% | 4.7\% |
| OGE Energy Corp. | OGE | 4.0\% | 4.0\% | 5.2\% | 4.4\% |
| Otter Tail Corporation | OTTR | 6.0\% | NA | NA | 6.0\% |
| PG\&E Corporation | PCG | 5.6\% | 5.6\% | 4.3\% | 5.2\% |
| Pinnacle West Capital Corporation | PNW | 4.5\% | 4.5\% | 4.5\% | 4.5\% |
| PNM Resources, Inc. | PNM | 6.9\% | 6.9\% | 6.8\% | 6.9\% |
| Portland General Electric Company | POR | 6.2\% | 6.2\% | 6.2\% | 6.2\% |
| PPL Corporation | PPL | 2.4\% | 2.4\% | 3.5\% | 2.8\% |
| SCANA Corporation | SCG | 6.3\% | 6.5\% | 5.5\% | 6.1\% |
| Southern Company | SO | 3.3\% | 3.8\% | 3.9\% | 3.7\% |
| WEC Energy Group, Inc. | WEC | 7.0\% | 6.8\% | 6.2\% | 6.7\% |
| Xcel Energy Inc. | XEL | 5.7\% | 5.3\% | 5.4\% | 5.5\% |
| Average |  | 5.1\% | 5.0\% | 5.3\% | 5.1\% |
| Median |  | 5.6\% | 5.5\% | 5.4\% | 5.5\% |
| Source: Exhibit JRW-10, Page 5 |  |  |  | Difference: | 0.70\% |

Implied Return on Equity with M/B Ratio at Unity

| Institution Name | Ticker | ROACE (\%) | Price/ Book (\%) |
| :--- | :--- | ---: | ---: |
|  |  | 2015 | 2015 |
| ALLETE, Inc. | ALE | 7.97 | 137.0 |
| Alliant Energy Corporation | LNT | 10.40 | 190.3 |
| Ameren Corporation | AEE | 9.23 | 151.0 |
| American Electric Power Company, Inc. | AEP | 11.74 | 159.9 |
| Avista Corporation | AVA | 8.17 | 144.2 |
| Black Hills Corporation | BKH | N/A | 162.1 |
| CMS Energy Corporation | CMS | 13.65 | 253.9 |
| Consolidated Edison, Inc. | ED | 9.28 | 144.3 |
| Dominion Resources, Inc. | D | 15.46 | 318.5 |
| DTE Energy Company | DTE | 8.41 | 164.1 |
| Duke Energy Corporation | DUK | 7.01 | 123.7 |
| Edison International | EIX | 9.03 | 169.7 |
| El Paso Electric Company | EE | 8.21 | 153.2 |
| Entergy Corporation | ETR | $\mathrm{N} / \mathrm{A}$ | 131.7 |
| Eversource Energy | ES | 8.62 | 156.5 |
| FirstEnergy Corp. | FE | 4.63 | 108.2 |
| IDACORP, Inc. | IDA | 9.72 | 166.3 |
| MGE Energy, Inc. | MGEE | 10.56 | 233.0 |
| NorthWestern Corporation | NWE | 9.95 | 163.3 |
| OGE Energy Corp. | OGE | 8.24 | 157.9 |
| Otter Tail Corporation | OTTR | 10.05 | 166.6 |
| PG\&E Corporation | 5.42 | 157.9 |  |
| Pinnacle West Capital Corporation | PNW | 9.76 | 156.1 |
| PNM Resources, Inc. | PNM | 0.91 | 147.1 |
| Portland General Electric Company | POR | 8.12 | 143.0 |
| PPL Corporation | PPL | 5.92 | 231.9 |
| SCANA Corporation | SCG | 14.00 | 158.8 |
| Southern Company | SO | 11.67 | 207.2 |
| WEC Energy Group, Inc. | WEC | 9.08 | 187.2 |
| Xcel Energy Inc. | XEL | 9.50 | 171.9 |

Source: SNL Financial

## SUMMARY OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.58379882 |
| R Square | 0.340821062 |
| Adjusted R Square | 0.315468026 |
| Standard Error | 35.64337804 |
| Observations | 28 |

ANOVA

|  | $d f$ |  | SS | $M S$ | $F$ | Significance $F$ |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Regression | 1 | 17078.67464 | 17078.67464 | 13.44300782 | 0.001108688 |  |
| Residual | 26 | 33031.71035 | 1270.450398 |  |  |  |
| Total | 27 | 50110.38499 |  |  |  |  |


|  | Coefficients | Standard Error | $t$ Stat | P-value | Lower 95\% | Upper 95\% |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Intercept | 93.11525796 | 22.60689647 | 4.118887265 | 0.000342669 | 46.64611676 | 139.5843992 |
| ROACE (\%) | 8.697998077 | 2.372308045 | 3.666470759 | 0.001108688 | 3.821649053 | 13.5743471 |


| ROE (\%) | PRICE/BOOK |
| :---: | :---: |
| 0.79 | 100.00 |
| 1.94 | 110.00 |


|  |  | [1] | [2] | [3] | [4] | [5] | [6] | [7] | [8] |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Dividend Yield | Expected Dividend Yield | Yahoo Earnings Growth | Reuters Earnings Growth | Zacks Earnings Growth | Average Earnings Growth | $\begin{aligned} & \text { Mean } \\ & \text { ROE } \end{aligned}$ | S\&P <br> Issuer <br> Credit <br> Rating | Numeric Credit Score |
| ALLETE, Inc. | ALE | 3.50\% | 3.59\% | 5.00\% | 5.00\% | 5.50\% | 5.17\% | 8.76\% | BBB+ | 5 |
| Alliant Energy Corporation | LNT | 3.20\% | 3.30\% | 6.60\% | 6.60\% | 6.10\% | 6.43\% | 9.74\% | A- | 4 |
| Ameren Corporation | AEE | 3.60\% | 3.70\% | 5.60\% | 5.60\% | 6.10\% | 5.77\% | 9.47\% | $\mathrm{BBB}+$ | 5 |
| American Electric Power Company, Inc. | AEP | 3.80\% | 3.86\% | 1.90\% | 1.90\% | 5.40\% | 3.07\% | 6.92\% | BBB | 6 |
| Avista Corporation | AVA | 3.40\% | 3.49\% | 5.70\% | NA | 5.30\% | 5.50\% | 8.99\% | BBB | 6 |
| Black Hills Corporation | BKH | 2.80\% | 2.89\% | 6.70\% | 6.70\% | 5.80\% | 6.40\% | 9.29\% | BBB | 6 |
| CMS Energy Corporation | CMS | 3.00\% | 3.11\% | 7.30\% | 7.30\% | 6.60\% | 7.07\% | 10.17\% | BBB+ | 5 |
| Consolidated Edison, Inc. | ED | 3.70\% | 3.74\% | 2.10\% | 2.10\% | 2.80\% | 2.33\% | 6.08\% | A- | 4 |
| Dominion Resources, Inc. | D | 3.80\% | 3.91\% | 5.80\% | 5.80\% | 5.90\% | 5.83\% | 9.74\% | BBB+ | 5 |
| DTE Energy Company | DTE | 3.50\% | 3.60\% | 5.60\% | 5.60\% | 5.80\% | 5.67\% | 9.27\% | BBB+ | 5 |
| Duke Energy Corporation | DUK | 4.50\% | 4.59\% | 3.50\% | 3.50\% | 4.70\% | 3.90\% | 8.49\% | A- | 4 |
| Edison International | EIX | 2.70\% | 2.74\% | 1.90\% | 1.90\% | 5.30\% | 3.03\% | 5.77\% | BBB+ | 5 |
| El Paso Electric Company | EE | 2.80\% | 2.88\% | 7.00\% | NA | 4.40\% | 5.70\% | 8.58\% | BBB | 6 |
| Entergy Corporation | ETR | 4.90\% | 4.73\% | -8.30\% | -8.30\% | -4.80\% | -7.13\% | -2.41\% | BBB | 6 |
| Eversource Energy | ES | 3.30\% | 3.40\% | 6.30\% | 6.30\% | 6.10\% | 6.23\% | 9.64\% | A | 3 |
| FirstEnergy Corp. | FE | 4.40\% | 4.32\% | -5.30\% | -5.30\% | -0.40\% | -3.67\% | 0.65\% | BBB- | 7 |
| IDACORP, Inc. | IDA | 2.90\% | 2.96\% | 4.10\% | 4.10\% | 4.40\% | 4.20\% | 7.16\% | BBB | 6 |
| MGE Energy, Inc. | MGEE | 2.20\% | 2.24\% | 4.00\% | NA | NA | 4.00\% | 6.24\% | AA- | 1 |
| NorthWestern Corporation | NWE | 3.60\% | 3.68\% | 4.50\% | 4.50\% | 5.00\% | 4.67\% | 8.35\% | BBB | 6 |
| OGE Energy Corp. | OGE | 4.00\% | 4.09\% | 4.00\% | 4.00\% | 5.20\% | 4.40\% | 8.49\% | A- | 4 |
| Otter Tail Corporation | OTTR | 3.60\% | 3.71\% | 6.00\% | NA | NA | 6.00\% | 9.71\% | BBB | 6 |
| PG\&E Corporation | PCG | 3.30\% | 3.39\% | 5.60\% | 5.60\% | 4.30\% | 5.17\% | 8.55\% | BBB | 6 |
| Pinnacle West Capital Corporation | PNW | 3.50\% | 3.58\% | 4.50\% | 4.50\% | 4.50\% | 4.50\% | 8.08\% | A- | 4 |
| PNM Resources, Inc. | PNM | 2.80\% | 2.90\% | 6.90\% | 6.90\% | 6.80\% | 6.87\% | 9.76\% | BBB+ | 5 |
| Portland General Electric Company | POR | 3.10\% | 3.20\% | 6.20\% | 6.20\% | 6.20\% | 6.20\% | 9.40\% | BBB | 6 |
| PPL Corporation | PPL | 4.60\% | 4.66\% | 2.40\% | 2.40\% | 3.50\% | 2.77\% | 7.43\% | A- | 4 |
| SCANA Corporation | SCG | 3.30\% | 3.40\% | 6.30\% | 6.50\% | 5.50\% | 6.10\% | 9.50\% | BBB+ | 5 |
| Southern Company | SO | 4.50\% | 4.58\% | 3.30\% | 3.80\% | 3.90\% | 3.67\% | 8.25\% | A- | 4 |
| WEC Energy Group, Inc. | WEC | 3.50\% | 3.62\% | 7.00\% | 6.80\% | 6.20\% | 6.67\% | 10.28\% | A- | 4 |
| Xcel Energy Inc. | XEL | 3.40\% | 3.49\% | 5.70\% | 5.30\% | 5.40\% | 5.47\% | 8.96\% | A- | 4 |
| PROXY GROUP MEAN |  | 3.51\% | 3.58\% | 4.26\% | 4.05\% | 4.70\% | 4.40\% | 7.98\% | BBB+ | 4.9 |
| PROXY GROUP MEDIAN |  | 3.50\% | 3.58\% | 5.60\% | 5.15\% | 5.35\% | 5.32\% | 8.67\% | BBB+ | 5.0 |

REGRESSION OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.211713 |
| R Square | 0.044823 |
| Adjusted R Square | 0.010709 |
| Standard Error | 0.027040 |
| Observations | 30 |

## ANOVA

|  | $d f$ | $S S$ | $M S$ | $F$ | Signif. $F$ |
| :--- | ---: | ---: | ---: | :---: | :---: |
| Regression | 1 | 0.000961 | 0.000961 | 1.313926 | 0.261387 |
| Residual | 28 | 0.020472 | 0.000731 |  |  |
| Total | 29 | 0.021433 |  |  |  |


|  | Coefficients | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Intercept | 0.103014 | 0.020868 | 4.936367 | 0.000033 | 0.060267 | 0.145762 |
| Credit Rating | -0.004743 | 0.004138 | -1.146266 | 0.261387 | -0.013220 | 0.003733 |

## Notes:

[1] Source: JRW-10
[2] Equals [1] $\times(1+0.5 \times[6])$
[3] Source: JRW-10
[4] Source: JRW-10
[5] Source: JRW-10
[6] Equals Average([3], [4], [5])
[7] Equals [4] + [8]
[8] Source: JRW-4

Constant Growth Discounted Cash Flow Model and Credit Rating Regression
90 Day Dividend Yield

|  |  | [1] | [2] | [3] | [4] | [5] | [6] | [7] $\quad$ S\&P |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Dividend Yield | Expected Dividend Yield | Yahoo Earnings Growth | Reuters Earnings Growth | $\begin{aligned} & \text { Zacks } \\ & \text { Earnings } \\ & \text { Growth } \end{aligned}$ | Average Earnings Growth | Mean ROE | Issuer Credit <br> Rating | Numeric Credit Score |
| ALLETE, Inc. | ALE | 3.50\% | 3.59\% | 5.00\% | 5.00\% | 5.50\% | 5.17\% | 8.76\% | BBB + | 5 |
| Alliant Energy Corporation | LNT | 3.10\% | 3.20\% | 6.60\% | 6.60\% | 6.10\% | 6.43\% | 9.63\% | A- | 4 |
| Ameren Corporation | AEE | 3.50\% | 3.60\% | 5.60\% | 5.60\% | 6.10\% | 5.77\% | 9.37\% | BBB+ | 5 |
| American Electric Power Company, Inc. | AEP | 3.70\% | 3.76\% | 1.90\% | 1.90\% | 5.40\% | 3.07\% | 6.82\% | BBB | 6 |
| Avista Corporation | AVA | 3.30\% | 3.39\% | 5.70\% | NA | 5.30\% | 5.50\% | 8.89\% | BBB | 6 |
| Black Hills Corporation | BKH | 2.80\% | 2.89\% | 6.70\% | 6.70\% | 5.80\% | 6.40\% | 9.29\% | BBB | 6 |
| CMS Energy Corporation | CMS | 2.90\% | 3.00\% | 7.30\% | 7.30\% | 6.60\% | 7.07\% | 10.07\% | BBB+ | 5 |
| Consolidated Edison, Inc. | ED | 3.60\% | 3.64\% | 2.10\% | 2.10\% | 2.80\% | 2.33\% | 5.98\% | A- | 4 |
| Dominion Resources, Inc. | D | 3.80\% | 3.91\% | 5.80\% | 5.80\% | 5.90\% | 5.83\% | 9.74\% | BBB + | 5 |
| DTE Energy Company | DTE | 3.50\% | 3.60\% | 5.60\% | 5.60\% | 5.80\% | 5.67\% | 9.27\% | BBB+ | 5 |
| Duke Energy Corporation | DUK | 4.30\% | 4.38\% | 3.50\% | 3.50\% | 4.70\% | 3.90\% | 8.28\% | A- | 4 |
| Edison International | EIX | 2.60\% | 2.64\% | 1.90\% | 1.90\% | 5.30\% | 3.03\% | 5.67\% | BBB+ | 5 |
| El Paso Electric Company | EE | 2.70\% | 2.78\% | 7.00\% | NA | 4.40\% | 5.70\% | 8.48\% | BBB | 6 |
| Entergy Corporation | ETR | 4.60\% | 4.44\% | -8.30\% | -8.30\% | -4.80\% | -7.13\% | -2.70\% | BBB | 6 |
| Eversource Energy | ES | 3.20\% | 3.30\% | 6.30\% | 6.30\% | 6.10\% | 6.23\% | 9.53\% | A | 3 |
| FirstEnergy Corp. | FE | 4.40\% | 4.32\% | -5.30\% | -5.30\% | -0.40\% | -3.67\% | 0.65\% | BBB- | 7 |
| IDACORP, Inc. | IDA | 2.90\% | 2.96\% | 4.10\% | 4.10\% | 4.40\% | 4.20\% | 7.16\% | BBB | 6 |
| MGE Energy, Inc. | MGEE | 2.20\% | 2.24\% | 4.00\% | NA | NA | 4.00\% | 6.24\% | AA- | 1 |
| NorthWestern Corporation | NWE | 3.50\% | 3.58\% | 4.50\% | 4.50\% | 5.00\% | 4.67\% | 8.25\% | BBB | 6 |
| OGE Energy Corp. | OGE | 3.90\% | 3.99\% | 4.00\% | 4.00\% | 5.20\% | 4.40\% | 8.39\% | A- | 4 |
| Otter Tail Corporation | OTTR | 3.60\% | 3.71\% | 6.00\% | NA | NA | 6.00\% | 9.71\% | BBB | 6 |
| PG\&E Corporation | PCG | 3.20\% | 3.28\% | 5.60\% | 5.60\% | 4.30\% | 5.17\% | 8.45\% | BBB | 6 |
| Pinnacle West Capital Corporation | PNW | 3.50\% | 3.58\% | 4.50\% | 4.50\% | 4.50\% | 4.50\% | 8.08\% | A- | 4 |
| PNM Resources, Inc. | PNM | 2.70\% | 2.79\% | 6.90\% | 6.90\% | 6.80\% | 6.87\% | 9.66\% | BBB+ | 5 |
| Portland General Electric Company | POR | 3.00\% | 3.09\% | 6.20\% | 6.20\% | 6.20\% | 6.20\% | 9.29\% | BBB | 6 |
| PPL Corporation | PPL | 4.40\% | 4.46\% | 2.40\% | 2.40\% | 3.50\% | 2.77\% | 7.23\% | A- | 4 |
| SCANA Corporation | SCG | 3.20\% | 3.30\% | 6.30\% | 6.50\% | 5.50\% | 6.10\% | 9.40\% | BBB+ | 5 |
| Southern Company | SO | 4.40\% | 4.48\% | 3.30\% | 3.80\% | 3.90\% | 3.67\% | 8.15\% | A- | 4 |
| WEC Energy Group, Inc. | WEC | 3.30\% | 3.41\% | 7.00\% | 6.80\% | 6.20\% | 6.67\% | 10.08\% | A- | 4 |
| Xcel Energy Inc. | XEL | 3.30\% | 3.39\% | 5.70\% | 5.30\% | 5.40\% | 5.47\% | 8.86\% | A- | 4 |
| PROXY GROUP MEAN |  | 3.42\% | 3.49\% | 4.26\% | 4.05\% | 4.70\% | 4.40\% | 7.89\% | BBB+ | 4.9 |
| PROXY GROUP MEDIAN |  | 3.40\% | 3.49\% | 5.60\% | 5.15\% | 5.35\% | 5.32\% | 8.62\% | BBB + | 5.0 |

REGRESSION OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.208599 |
| R Square | 0.043514 |
| Adjusted R Square | 0.009353 |
| Standard Error | 0.027243 |
| Observations | 30 |

## ANOVA

|  | $d f$ | SS | MS | $F$ | Signif. $F$ |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Regression | 1 | 0.000945 | 0.000945 | 1.273810 | 0.268631 |  |
| Residual | 28 | 0.020781 | 0.000742 |  |  |  |
| Total | 29 | 0.021727 |  |  |  |  |
|  |  |  |  |  |  |  |
|  | Coefficients | Standard Error | $t$ Stat | P-value | Lower 95\% | Upper 95\% |
| Intercept | 0.101947 | 0.021025 | 4.848746 | 0.000042 | 0.058878 | 0.145015 |
| Credit Rating | -0.004705 | 0.004169 | -1.128632 | 0.268631 | -0.013245 | 0.003835 |

## Notes:

[1] Source: JRW-10
[2] Equals [1] $\times(1+0.5 \times[6])$
[3] Source: JRW-10
[4] Source: JRW-10
[5] Source: JRW-10
[6] Equals Average([3], [4], [5])
[7] Equals [4] + [8]
[8] Source: JRW-4

Constant Growth Discounted Cash Flow Model and Credit Rating Regression
180 Day Dividend Yield

|  |  | [1] | [2] | [3] | [4] | [5] | [6] | St |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Dividend Yield | Expected <br> Dividend Yield | Yahoo Earnings Growth | Reuters Earnings Growth | Zacks Earnings Growth | Average Earnings Growth | $\begin{aligned} & \text { Mean } \\ & \text { ROE } \end{aligned}$ | Issuer <br> Credit <br> Rating | Numeric Credit Score |
| ALLETE, Inc. | ALE | 3.60\% | 3.69\% | 5.00\% | 5.00\% | 5.50\% | 5.17\% | 8.86\% | BBB+ | 5 |
| Alliant Energy Corporation | LNT | 3.20\% | 3.30\% | 6.60\% | 6.60\% | 6.10\% | 6.43\% | 9.74\% | A- | 4 |
| Ameren Corporation | AEE | 3.60\% | 3.70\% | 5.60\% | 5.60\% | 6.10\% | 5.77\% | 9.47\% | BBB+ | 5 |
| American Electric Power Company, Inc. | AEP | 3.70\% | 3.76\% | 1.90\% | 1.90\% | 5.40\% | 3.07\% | 6.82\% | BBB | 6 |
| Avista Corporation | AVA | 3.40\% | 3.49\% | 5.70\% | NA | 5.30\% | 5.50\% | 8.99\% | BBB | 6 |
| Black Hills Corporation | BKH | 2.80\% | 2.89\% | 6.70\% | 6.70\% | 5.80\% | 6.40\% | 9.29\% | BBB | 6 |
| CMS Energy Corporation | CMS | 3.00\% | 3.11\% | 7.30\% | 7.30\% | 6.60\% | 7.07\% | 10.17\% | BBB+ | 5 |
| Consolidated Edison, Inc. | ED | 3.60\% | 3.64\% | 2.10\% | 2.10\% | 2.80\% | 2.33\% | 5.98\% | A- | 4 |
| Dominion Resources, Inc. | D | 3.80\% | 3.91\% | 5.80\% | 5.80\% | 5.90\% | 5.83\% | 9.74\% | $\mathrm{BBB}+$ | 5 |
| DTE Energy Company | DTE | 3.60\% | 3.70\% | 5.60\% | 5.60\% | 5.80\% | 5.67\% | 9.37\% | BBB+ | 5 |
| Duke Energy Corporation | DUK | 4.30\% | 4.38\% | 3.50\% | 3.50\% | 4.70\% | 3.90\% | 8.28\% | A- | 4 |
| Edison International | EIX | 2.70\% | 2.74\% | 1.90\% | 1.90\% | 5.30\% | 3.03\% | 5.77\% | BBB+ | 5 |
| El Paso Electric Company | EE | 2.80\% | 2.88\% | 7.00\% | NA | 4.40\% | 5.70\% | 8.58\% | BBB | 6 |
| Entergy Corporation | ETR | 4.60\% | 4.44\% | -8.30\% | -8.30\% | -4.80\% | -7.13\% | -2.70\% | BBB | 6 |
| Eversource Energy | ES | 3.20\% | 3.30\% | 6.30\% | 6.30\% | 6.10\% | 6.23\% | 9.53\% | A | 3 |
| FirstEnergy Corp. | FE | 4.30\% | 4.22\% | -5.30\% | -5.30\% | -0.40\% | -3.67\% | 0.55\% | BBB- | 7 |
| IDACORP, Inc. | IDA | 2.90\% | 2.96\% | 4.10\% | 4.10\% | 4.40\% | 4.20\% | 7.16\% | BBB | 6 |
| MGE Energy, Inc. | MGEE | 2.30\% | 2.35\% | 4.00\% | NA | NA | 4.00\% | 6.35\% | AA- | 1 |
| NorthWestern Corporation | NWE | 3.40\% | 3.48\% | 4.50\% | 4.50\% | 5.00\% | 4.67\% | 8.15\% | BBB | 6 |
| OGE Energy Corp. | OGE | 4.00\% | 4.09\% | 4.00\% | 4.00\% | 5.20\% | 4.40\% | 8.49\% | A- | 4 |
| Otter Tail Corporation | OTTR | 3.90\% | 4.02\% | 6.00\% | NA | NA | 6.00\% | 10.02\% | BBB | 6 |
| PG\&E Corporation | PCG | 3.20\% | 3.28\% | 5.60\% | 5.60\% | 4.30\% | 5.17\% | 8.45\% | BBB | 6 |
| Pinnacle West Capital Corporation | PNW | 3.50\% | 3.58\% | 4.50\% | 4.50\% | 4.50\% | 4.50\% | 8.08\% | A- | 4 |
| PNM Resources, Inc. | PNM | 2.70\% | 2.79\% | 6.90\% | 6.90\% | 6.80\% | 6.87\% | 9.66\% | $\mathrm{BBB}+$ | 5 |
| Portland General Electric Company | POR | 3.10\% | 3.20\% | 6.20\% | 6.20\% | 6.20\% | 6.20\% | 9.40\% | BBB | 6 |
| PPL Corporation | PPL | 4.20\% | 4.26\% | 2.40\% | 2.40\% | 3.50\% | 2.77\% | 7.02\% | A- | 4 |
| SCANA Corporation | SCG | 3.30\% | 3.40\% | 6.30\% | 6.50\% | 5.50\% | 6.10\% | 9.50\% | BBB+ | 5 |
| Southern Company | SO | 4.40\% | 4.48\% | 3.30\% | 3.80\% | 3.90\% | 3.67\% | 8.15\% | A- | 4 |
| WEC Energy Group, Inc. | WEC | 3.30\% | 3.41\% | 7.00\% | 6.80\% | 6.20\% | 6.67\% | 10.08\% | A- | 4 |
| Xcel Energy Inc. | XEL | 3.30\% | 3.39\% | 5.70\% | 5.30\% | 5.40\% | 5.47\% | 8.86\% | A- | 4 |
| PROXY GROUP MEAN |  | 3.46\% | 3.53\% | 4.26\% | 4.05\% | 4.70\% | 4.40\% | 7.93\% | BBB+ | 4.9 |
| PROXY GROUP MEDIAN |  | 3.40\% | 3.49\% | 5.60\% | 5.15\% | 5.35\% | 5.32\% | 8.72\% | BBB+ | 5.0 |

REGRESSION OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.206105 |
| R Square | 0.042479 |
| Adjusted R Square | 0.008282 |
| Standard Error | 0.027557 |
| Observations | 30 |

## ANOVA

|  | $d f$ | $S S$ | $M S$ | $F$ | Signif. $F$ |  |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
| Regression | 1 | 0.000943 | 0.000943 | 1.242181 | 0.274527 |  |
| Residual | 28 | 0.021263 | 0.000759 |  |  |  |
| Total | 29 | 0.022207 |  |  |  |  |
|  |  |  |  |  |  |  |
|  | Coefficients | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% |
| Intercept | 0.102301 | 0.021268 | 4.810109 | 0.000047 | 0.058735 | 0.145866 |
| Credit Rating | -0.0047 | 0.004217 | -1.114532 | 0.274527 | -0.013339 | 0.003938 |

## Notes:

[1] Source: JRW-10
[2] Equals [1] $\times(1+0.5 \times[6])$
[3] Source: JRW-10
[4] Source: JRW-10
[5] Source: JRW-10
[6] Equals Average([3], [4], [5])
[7] Equals [4] + [8]
[8] Source: JRW-4

Analysis Using Gorman's Rolling Average Equity Risk Premium Data

| Year | Authorized Electric Returns | Treasury Bond Yield | Indicated Risk Premium | Rolling 5-Year Average Treasury | Rolling <br> 5-Year <br> Average <br> Risk Premium | Slope | Rolling 10-Year Average Treasury | Rolling 10-Year Average Risk Premium | Slope |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1986 | 13.93\% | 7.80\% | 6.13\% |  |  |  |  |  |  |
| 1987 | 12.99\% | 8.58\% | 4.41\% |  |  |  |  |  |  |
| 1988 | 12.79\% | 8.96\% | 3.83\% |  |  |  |  |  |  |
| 1989 | 12.97\% | 8.45\% | 4.52\% |  |  |  |  |  |  |
| 1990 | 12.70\% | 8.61\% | 4.09\% | 8.48\% | 4.60\% | -46.40\% |  |  | -47.87\% |
| 1991 | 12.55\% | 8.14\% | 4.41\% | 8.55\% | 4.25\% |  |  |  |  |
| 1992 | 12.09\% | 7.67\% | 4.42\% | 8.36\% | 4.26\% |  |  |  |  |
| 1993 | 11.41\% | 6.60\% | 4.81\% | 7.89\% | 4.45\% |  |  |  |  |
| 1994 | 11.34\% | 7.37\% | 3.97\% | 7.68\% | 4.34\% |  |  |  |  |
| 1995 | 11.55\% | 6.88\% | 4.67\% | 7.33\% | 4.46\% |  | 7.91\% | 4.53\% |  |
| 1996 | 11.39\% | 6.70\% | 4.69\% | 7.04\% | 4.51\% |  | 7.80\% | 4.38\% |  |
| 1997 | 11.40\% | 6.61\% | 4.79\% | 6.83\% | 4.59\% |  | 7.60\% | 4.42\% |  |
| 1998 | 11.66\% | 5.58\% | 6.08\% | 6.63\% | 4.84\% |  | 7.26\% | 4.65\% |  |
| 1999 | 10.77\% | 5.87\% | 4.90\% | 6.33\% | 5.03\% |  | 7.00\% | 4.68\% |  |
| 2000 | 11.43\% | 5.94\% | 5.49\% | 6.14\% | 5.19\% |  | 6.73\% | 4.82\% |  |
| 2001 | 11.09\% | 5.49\% | 5.60\% | 5.90\% | 5.37\% |  | 6.47\% | 4.94\% |  |
| 2002 | 11.16\% | 5.43\% | 5.73\% | 5.66\% | 5.56\% |  | 6.25\% | 5.07\% |  |
| 2003 | 10.97\% | 4.96\% | 6.01\% | 5.54\% | 5.55\% |  | 6.08\% | 5.19\% |  |
| 2004 | 10.75\% | 5.05\% | 5.70\% | 5.37\% | 5.71\% |  | 5.85\% | 5.37\% |  |
| 2005 | 10.54\% | 4.65\% | 5.89\% | 5.11\% | 5.79\% |  | 5.63\% | 5.49\% |  |
| 2006 | 10.34\% | 4.99\% | 5.35\% | 5.01\% | 5.74\% |  | 5.46\% | 5.56\% |  |
| 2007 | 10.31\% | 4.83\% | 5.48\% | 4.90\% | 5.69\% |  | 5.28\% | 5.62\% |  |
| 2008 | 10.37\% | 4.28\% | 6.09\% | 4.76\% | 5.70\% |  | 5.15\% | 5.62\% |  |
| 2009 | 10.52\% | 4.07\% | 6.45\% | 4.56\% | 5.85\% |  | 4.97\% | 5.78\% |  |
| 2010 | 10.29\% | 4.25\% | 6.04\% | 4.49\% | 5.88\% |  | 4.80\% | 5.83\% |  |
| 2011 | 10.19\% | 3.91\% | 6.28\% | 4.27\% | 6.07\% |  | 4.64\% | 5.90\% |  |
| 2012 | 10.01\% | 2.92\% | 7.09\% | 3.89\% | 6.39\% |  | 4.39\% | 6.04\% |  |
| 2013 | 9.81\% | 3.45\% | 6.36\% | 3.72\% | 6.44\% |  | 4.24\% | 6.07\% |  |
| 2014 | 9.75\% | 3.34\% | 6.41\% | 3.57\% | 6.44\% |  | 4.07\% | 6.14\% |  |
| 2015 | 9.60\% | 2.84\% | 6.76\% | 3.29\% | 6.58\% |  | 3.89\% | 6.23\% |  |
| 2016 | 9.64\% | 2.52\% | 7.12\% | 3.01\% | 6.75\% |  | 3.64\% | 6.41\% |  |
| Average | 11.17\% | 5.70\% | 5.47\% | 5.72\% | 5.41\% |  | 5.69\% | 5.40\% |  |
| Minimum |  |  |  | 3.01\% | 4.25\% |  | 3.64\% | 4.38\% |  |
| Maximum |  |  |  | 8.55\% | 6.75\% |  | 7.91\% | 6.41\% |  |

Source: Schedule MPG-13

Analysis Using Gorman's Rolling Average Equity Risk Premium Data

| Year | Authorized Electric Returns | Utiltiy Bond Yield | Rolling Indicated Risk Premium | Rolling 5-Year Average Utility Bond | 5-Year Average Risk Premium | Rolling Slope | Rolling 10-Year Average Utility Bond | 10-Year Average Risk Premium | Slope |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1986 | 13.93\% | 9.58\% | 4.35\% |  |  |  |  |  |  |
| 1987 | 12.99\% | 10.10\% | 2.89\% |  |  |  |  |  |  |
| 1988 | 12.79\% | 10.49\% | 2.30\% |  |  |  |  |  |  |
| 1989 | 12.97\% | 9.77\% | 3.20\% |  |  |  |  |  |  |
| 1990 | 12.70\% | 9.86\% | 2.84\% | 9.96\% | 3.12\% | -45.63\% |  |  | -45.11\% |
| 1991 | 12.55\% | 9.36\% | 3.19\% | 9.92\% | 2.88\% |  |  |  |  |
| 1992 | 12.09\% | 8.69\% | 3.40\% | 9.63\% | 2.99\% |  |  |  |  |
| 1993 | 11.41\% | 7.59\% | 3.82\% | 9.05\% | 3.29\% |  |  |  |  |
| 1994 | 11.34\% | 8.31\% | 3.03\% | 8.76\% | 3.26\% |  |  |  |  |
| 1995 | 11.55\% | 7.89\% | 3.66\% | 8.37\% | 3.42\% |  | 9.16\% | 3.27\% |  |
| 1996 | 11.39\% | 7.75\% | 3.64\% | 8.05\% | 3.51\% |  | 8.98\% | 3.20\% |  |
| 1997 | 11.40\% | 7.60\% | 3.80\% | 7.83\% | 3.59\% |  | 8.73\% | 3.29\% |  |
| 1998 | 11.66\% | 7.04\% | 4.62\% | 7.72\% | 3.75\% |  | 8.39\% | 3.52\% |  |
| 1999 | 10.77\% | 7.62\% | 3.15\% | 7.58\% | 3.77\% |  | 8.17\% | 3.52\% |  |
| 2000 | 11.43\% | 8.24\% | 3.19\% | 7.65\% | 3.68\% |  | 8.01\% | 3.55\% |  |
| 2001 | 11.09\% | 7.76\% | 3.33\% | 7.65\% | 3.62\% |  | 7.85\% | 3.56\% |  |
| 2002 | 11.16\% | 7.37\% | 3.79\% | 7.61\% | 3.61\% |  | 7.72\% | 3.60\% |  |
| 2003 | 10.97\% | 6.58\% | 4.39\% | 7.52\% | 3.57\% |  | 7.62\% | 3.66\% |  |
| 2004 | 10.75\% | 6.16\% | 4.59\% | 7.22\% | 3.86\% |  | 7.40\% | 3.81\% |  |
| 2005 | 10.54\% | 5.65\% | 4.89\% | 6.71\% | 4.20\% |  | 7.18\% | 3.94\% |  |
| 2006 | 10.34\% | 6.07\% | 4.27\% | 6.37\% | 4.39\% |  | 7.01\% | 4.00\% |  |
| 2007 | 10.31\% | 6.07\% | 4.24\% | 6.11\% | 4.48\% |  | 6.86\% | 4.04\% |  |
| 2008 | 10.37\% | 6.53\% | 3.84\% | 6.10\% | 4.37\% |  | 6.81\% | 3.97\% |  |
| 2009 | 10.52\% | 6.04\% | 4.48\% | 6.07\% | 4.34\% |  | 6.65\% | 4.10\% |  |
| 2010 | 10.29\% | 5.46\% | 4.83\% | 6.03\% | 4.33\% |  | 6.37\% | 4.26\% |  |
| 2011 | 10.19\% | 5.04\% | 5.15\% | 5.83\% | 4.51\% |  | 6.10\% | 4.45\% |  |
| 2012 | 10.01\% | 4.13\% | 5.88\% | 5.44\% | 4.84\% |  | 5.77\% | 4.66\% |  |
| 2013 | 9.81\% | 4.48\% | 5.33\% | 5.03\% | 5.13\% |  | 5.56\% | 4.75\% |  |
| 2014 | 9.75\% | 4.28\% | 5.47\% | 4.68\% | 5.33\% |  | 5.37\% | 4.84\% |  |
| 2015 | 9.60\% | 4.12\% | 5.48\% | 4.41\% | 5.46\% |  | 5.22\% | 4.90\% |  |
| 2016 | 9.64\% | 3.89\% | 5.75\% | 4.18\% | 5.58\% |  | 5.00\% | 5.05\% |  |
| Average | 11.17\% | 7.08\% | 4.09\% | 7.09\% | 4.03\% |  | 7.09\% | 4.00\% |  |
| Minimum |  |  |  | 4.18\% | 2.88\% |  | 5.00\% | 3.20\% |  |
| Maximum |  |  |  | 9.96\% | 5.58\% |  | 9.16\% | 5.05\% |  |

Source: Schedule MPG-14

## SUMMARY OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.978904 |
| R Square | 0.958253 |
| Adjusted R Square | 0.956583 |
| Standard Error | 0.001631 |
| Observations | 27 |



| $[1]$ <br> Risk-Free Rate | $[2]$ <br> Risk Premium | $[3]$ <br> ROE |
| :---: | :---: | :---: |
| $3.40 \%$ | $6.48 \%$ | $9.88 \%$ |

SUMMARY OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.978809 |
| R Square | 0.958067 |
| Adjusted R Square | 0.956389 |
| Standard Error | 0.001586 |
| Observations | 27 |


| ANOVA | df |  | SS | MS | $F$ | Significance $F$ |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: |
|  | 1 | 0.001437 | 0.001437 | 571.183261 | 0.000000 |  |
| Regression | 25 | 0.000063 | 0.000003 |  |  |  |
| Residual | 26 | 0.001500 |  |  |  |  |
| Total |  |  |  |  |  |  |


|  | Coefficients | Standard Error | Stat | P-value | Lower 95\% | Upper 95\% | Lower 95.0\% | Upper 95.0\% |
| :--- | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| Intercept | 0.072681 | 0.001388 | 52.367148 | 0.000000 | 0.069822 | 0.075539 | 0.069822 | 0.075539 |
| Utility Bond Yield | -0.456325 | 0.019094 | -23.899441 | 0.000000 | -0.495649 | -0.417001 | -0.495649 | -0.417001 |


| $[1]$ |  |  |
| :---: | :---: | :---: |
| Risk-Free Rate | Risk Premium | $[3]$ |
| $4.38 \%$ | $5.27 \%$ | $9.65 \%$ |

Notes:
1] Source: Direct Testimony of Michael P. Gorman, at 45-46
2] Equals [1] x Yield Coefficient + Intercept
[3] Equals [1] + [2]



| Year | ROE | Utility "A" Bond Yield | Treasury Bond Yield | Credit Spread | Treasury Equity Risk Premium | Utility Bond Equity Risk Premium | Treasury Yield | Credit Spread |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1986 | 13.93\% | 9.58\% | 7.80\% | 1.78\% | 6.13\% | 4.35\% | 7.80\% | 1.78\% |
| 1987 | 12.99\% | 10.10\% | 8.58\% | 1.52\% | 4.41\% | 2.89\% | 8.58\% | 1.52\% |
| 1988 | 12.79\% | 10.49\% | 8.96\% | 1.53\% | 3.83\% | 2.30\% | 8.96\% | 1.53\% |
| 1989 | 12.97\% | 9.77\% | 8.45\% | 1.32\% | 4.52\% | 3.20\% | 8.45\% | 1.32\% |
| 1990 | 12.70\% | 9.86\% | 8.61\% | 1.25\% | 4.09\% | 2.84\% | 8.61\% | 1.25\% |
| 1991 | 12.55\% | 9.36\% | 8.14\% | 1.22\% | 4.41\% | 3.19\% | 8.14\% | 1.22\% |
| 1992 | 12.09\% | 8.69\% | 7.67\% | 1.02\% | 4.42\% | 3.40\% | 7.67\% | 1.02\% |
| 1993 | 11.41\% | 7.59\% | 6.60\% | 0.99\% | 4.81\% | 3.82\% | 6.60\% | 0.99\% |
| 1994 | 11.34\% | 8.31\% | 7.37\% | 0.94\% | 3.97\% | 3.03\% | 7.37\% | 0.94\% |
| 1995 | 11.55\% | 7.89\% | 6.88\% | 1.01\% | 4.67\% | 3.66\% | 6.88\% | 1.01\% |
| 1996 | 11.39\% | 7.75\% | 6.70\% | 1.05\% | 4.69\% | 3.64\% | 6.70\% | 1.05\% |
| 1997 | 11.40\% | 7.60\% | 6.61\% | 0.99\% | 4.79\% | 3.80\% | 6.61\% | 0.99\% |
| 1998 | 11.66\% | 7.04\% | 5.58\% | 1.46\% | 6.08\% | 4.62\% | 5.58\% | 1.46\% |
| 1999 | 10.77\% | 7.62\% | 5.87\% | 1.75\% | 4.90\% | 3.15\% | 5.87\% | 1.75\% |
| 2000 | 11.43\% | 8.24\% | 5.94\% | 2.30\% | 5.49\% | 3.19\% | 5.94\% | 2.30\% |
| 2001 | 11.09\% | 7.76\% | 5.49\% | 2.27\% | 5.60\% | 3.33\% | 5.49\% | 2.27\% |
| 2002 | 11.16\% | 7.37\% | 5.43\% | 1.94\% | 5.73\% | 3.79\% | 5.43\% | 1.94\% |
| 2003 | 10.97\% | 6.58\% | 4.96\% | 1.62\% | 6.01\% | 4.39\% | 4.96\% | 1.62\% |
| 2004 | 10.75\% | 6.16\% | 5.05\% | 1.11\% | 5.70\% | 4.59\% | 5.05\% | 1.11\% |
| 2005 | 10.54\% | 5.65\% | 4.65\% | 1.00\% | 5.89\% | 4.89\% | 4.65\% | 1.00\% |
| 2006 | 10.34\% | 6.07\% | 4.99\% | 1.08\% | 5.35\% | 4.27\% | 4.99\% | 1.08\% |
| 2007 | 10.31\% | 6.07\% | 4.83\% | 1.24\% | 5.48\% | 4.24\% | 4.83\% | 1.24\% |
| 2008 | 10.37\% | 6.53\% | 4.28\% | 2.25\% | 6.09\% | 3.84\% | 4.28\% | 2.25\% |
| 2009 | 10.52\% | 6.04\% | 4.07\% | 1.97\% | 6.45\% | 4.48\% | 4.07\% | 1.97\% |
| 2010 | 10.29\% | 5.46\% | 4.25\% | 1.21\% | 6.04\% | 4.83\% | 4.25\% | 1.21\% |
| 2011 | 10.19\% | 5.04\% | 3.91\% | 1.13\% | 6.28\% | 5.15\% | 3.91\% | 1.13\% |
| 2012 | 10.01\% | 4.13\% | 2.92\% | 1.21\% | 7.09\% | 5.88\% | 2.92\% | 1.21\% |
| 2013 | 9.81\% | 4.48\% | 3.45\% | 1.03\% | 6.36\% | 5.33\% | 3.45\% | 1.03\% |
| 2014 | 9.75\% | 4.28\% | 3.34\% | 0.94\% | 6.41\% | 5.47\% | 3.34\% | 0.94\% |
| 2015 | 9.60\% | 4.12\% | 2.84\% | 1.27\% | 6.76\% | 5.48\% | 2.84\% | 1.27\% |
| 2016 | 9.64\% | 3.89\% | 2.52\% | 1.37\% | 7.12\% | 5.75\% | 2.52\% | 1.37\% |

Source: Schedules MPG-13 and MPG-14

## SUMMARY OUTPUT

|  | Regression Statistics |  |
| :--- | ---: | ---: |
| Multiple R | 0.900422 |  |
| R Square | 0.810759 |  |
| Adjusted R Square | 0.804233 |  |
| Standard Error | 0.004118 |  |
| Observations | 31 |  |


|  | $d f$ |  | SS | MS | $F$ | Significance F |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Regression |  | 1 | 0.002107 | 0.002107 | 124.243725 | 0.000000 |  |
| Residual |  | 29 | 0.000492 | 0.000017 |  |  |  |
| Total |  | 30 | 0.002599 |  |  |  |  |
|  | Coefficients |  | Standard Error | t Stat | $P$-value | Lower 95\% | Upper 95\% |
| Intercept |  | 0.080105 | 0.002396 | 33.436484 | 0.000000 | 0.075205 | 0.085005 |
| Treasury Yield |  | -0.445545 | 0.039972 | -11.146467 | 0.000000 | -0.527296 | -0.363793 |

RESIDUAL OUTPUT


## SUMMARY OUTPUT

|  | Regression Statistics |  |
| :--- | ---: | ---: |
| Multiple R | 0.916547 |  |
| R Square | 0.840059 |  |
| Adjusted R Square | 0.834544 |  |
| Standard Error | 0.003856 |  |
| Observations | 31 |  |

ANOVA

|  | $d f$ |  | SS | MS | F | Significance F |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Regression |  | 1 | 0.002264 | 0.002264 | 152.317172 | 0.000000 |  |
| Residual |  | 29 | 0.000431 | 0.000015 |  |  |  |
| Total |  | 30 | 0.002695 |  |  |  |  |
|  | Coefficients |  | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% |
| Intercept |  | 0.072920 | 0.002685 | 27.155980 | 0.000000 | 0.067428 | 0.078412 |
| Utility "A" Bond Yield |  | -0.452169 | 0.036638 | -12.341684 | 0.000000 | -0.527101 | -0.377237 |

RESIDUAL OUTPUT


SUMMARY OUTPUT

| Regression Statistics |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Multiple R | 0.916406 |  |  |  |  |  |
| R Square | 0.839800 |  |  |  |  |  |
| Adjusted R Square | 0.828357 |  |  |  |  |  |
| Standard Error | 0.003856 |  |  |  |  |  |
| Observations | 31 |  |  |  |  |  |
| ANOVA |  |  |  |  |  |  |
|  | $d f$ | SS | MS | $F$ | Significance F |  |
| Regression | 2 | 0.002183 | 0.001091 | 73.390525 | 0.000000 |  |
| Residual | 28 | 0.000416 | 0.000015 |  |  |  |
| Total | 30 | 0.002599 |  |  |  |  |
|  | Coefficients | Standard Error | $t$ Stat | $P$-value | Lower 95\% | Upper 95\% |
| Intercept | 0.074767 | 0.003263 | 22.914675 | 0.000000 | 0.068083 | 0.081450 |
| Treasury Yield | -0.444549 | 0.037431 | -11.876584 | 0.000000 | -0.521223 | -0.367876 |
| Credit Spread | 0.382569 | 0.169809 | 2.252942 | 0.032285 | 0.034732 | 0.730406 |

RESIDUAL OUTPUT

| Observation | Predicted Equity Risk Premium | Residuals | $\left(\mathrm{e}_{\mathrm{t}}-\mathrm{e}_{(\mathrm{t}-1)}\right)^{\text {c }}$ | $\left(e_{t}\right)^{2}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | 0.046915427 | 0.014401239 |  |  |  |
| 2 | 0.042439478 | 0.001660522 | 0.00016 | 0.00000 |  |
| 3 | 0.040795339 | -0.002487006 | 0.00002 | 0.00001 |  |
| 4 | 0.042259147 | 0.002949186 | 0.00003 | 0.00001 |  |
| 5 | 0.041286963 | -0.000370296 | 0.00001 | 0.00000 |  |
| 6 | 0.043282253 | 0.000859414 | 0.00000 | 0.00000 |  |
| 7 | 0.044599605 | -0.000366272 | 0.00000 | 0.00000 |  |
| 8 | 0.049227728 | -0.001111061 | 0.00000 | 0.00000 |  |
| 9 | 0.045599628 | -0.005899628 | 0.00002 | 0.00003 |  |
| 10 | 0.048011255 | -0.001352921 | 0.00002 | 0.00000 |  |
| 11 | 0.048992042 | -0.002100375 | 0.00000 | 0.00000 |  |
| 12 | 0.049203951 | -0.001262284 | 0.00000 | 0.00000 |  |
| 13 | 0.055560205 | 0.005256462 | 0.00004 | 0.00003 |  |
| 14 | 0.055401139 | -0.006359472 | 0.00013 | 0.00004 |  |
| 15 | 0.057154881 | -0.002279881 | 0.00002 | 0.00001 |  |
| 16 | 0.059027314 | -0.003060647 | 0.00000 | 0.00001 |  |
| 17 | 0.058059138 | -0.000759138 | 0.00001 | 0.00000 |  |
| 18 | 0.058938602 | 0.001186398 | 0.00000 | 0.00000 |  |
| 19 | 0.056591431 | 0.000441902 | 0.00000 | 0.00000 |  |
| 20 | 0.057952189 | 0.000989478 | 0.00000 | 0.00000 |  |
| 21 | 0.056688446 | -0.003213446 | 0.00002 | 0.00001 |  |
| 22 | 0.058017179 | -0.003258845 | 0.00000 | 0.00001 |  |
| 23 | 0.064348371 | -0.003440038 | 0.00000 | 0.00001 |  |
| 24 | 0.064204624 | 0.000303709 | 0.00001 | 0.00000 |  |
| 25 | 0.060500417 | -0.00010875 | 0.00000 | 0.00000 |  |
| 26 | 0.061705289 | 0.001086378 | 0.00000 | 0.00000 |  |
| 27 | 0.06641113 | 0.004480536 | 0.00001 | 0.00002 |  |
| 28 | 0.063369168 | 0.000247498 | 0.00002 | 0.00000 |  |
| 29 | 0.063505059 | 0.000594941 | 0.00000 | 0.00000 |  |
| 30 | 0.067013948 | 0.000577719 | 0.00000 | 0.00000 |  |
| 31 | 0.068805321 | 0.002394679 | 0.00000 | 0.00001 |  |
|  |  |  | 0.00054 | 0.00021 |  |
|  |  | Durbin-Watson | 2.58115 |  |  |
|  |  |  | 1.085 | 4-dL | 4-dU |
|  |  |  | 1.345 | 2.915 | 2.655 |
|  |  |  | TRUE |  |  |
|  |  | 4-dU | true | utocorrelation |  |

Mr. Gorman's Financial Integrity Analysis (Schedule MPG-19)

| Description | Retail Cost of Service Amount |  | S\&P Benchmark (Medial Volatility) |  |  | Reference |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Intermediate | Significant | Aggressive |  |
|  |  | (1) | (2) | (3) | (4) |  |
| Rate Base | \$ | 7,195,256 |  |  |  | Schedule LMM-15. |
| Weighted Common Return |  | 4.77\% |  |  |  | Page 2, Line 3, Col 4. |
| Pre-Tax Rate of Return |  | 10.30\% |  |  |  | Page 2, Line 4, Col 5. |
| Income to Common | \$ | 342,897 |  |  |  | Line $1 \times$ Line 2. |
| EBIT | \$ | 741,160 |  |  |  | Line $1 \times$ Line 3. |
| Depreciation \& Amortization | \$ | 532,300 |  |  |  | Schedule LMM-12. |
| Imputed Amortization | \$ | 6,887 |  |  |  | S\&P Capital IQ, downloaded on December 2, 2016. |
| Deferred Income Taxes \& ITC | \$ | $(5,915)$ |  |  |  | Schedule LMM-14. |
| Funds from Operations (FFO) | \$ | 876,169 |  |  |  | Sum of Line 4 and Lines 6 through 8. |
| Imputed \& Capitalized Interest Expense | \$ | 16,613 |  |  |  | S\&P Capital IQ, downloaded on December 2, 2016. |
| EBITDA | \$ | 1,296,960 |  |  |  | Sum of Lines 5 through 7 and Line 10. |
| Total Debt Ratio |  | 47.6\% |  |  |  | Page 3, Line 3, Col. 2 |
| Debt to EBITDA |  | 2.64x | 2.5x-3.5x | $3.5 x-4.5 x$ | $4.5 x-5.5 x$ | (Line $1 \times$ Line 12) / Line 11. |
| FFO to Total Debt |  | 25.58\% | 23\%-35\% | 13\%-23\% | 9\%-13\% | Line 9 / (Line $1 \times$ Line 12). |




[^0]:    1 Black Hills Corporation, SEC Form 8-K, February 12, 2016. Wisconsin Energy Corporation, Wisconsin Energy completes acquisition of Integrys to form WEC Energy Group, Press Release, June 29, 2015. The combined company is now called WEC Energy Group, Inc.
    2 Source: Federal Reserve Board Schedule H.15. Yields measured on a monthly basis.

[^1]:    3 Source: http://www.cmegroup.com/trading/interest-rates/countdown-to-fomc.html, accessed January 16, 2017.
    4 Blue Chip Financial Forecasts, Vol. 36, No. 1, January 1, 2016, at 2.

[^2]:    5 http://www.nasdaq.com/symbol/tlt/option-chain?dateindex=8.
    6 In addition to the Expectations theory, there are other theories regarding the term structure of interest rates including: the Liquidity Premium Theory, which asserts that investors require a premium for holding long term bonds; the Market Segmentation Theory, which states that securities of different terms are not substitutable and, as such, the supply of and demand for short-term and long-term instruments is developed independently; and the Preferred Habitat Theory, which states that in addition to interest rate expectations, certain investors have distinct investment horizons and will require a return premium for bonds with maturities outside of that preference.

[^3]:    7 Source: Federal Reserve Schedule H.15. Spot yields are interpolated.
    8 Bureau of Economic Analysis, News Release dated December 22, 2016.
    $9 \quad$ Federal Reserve Schedule H.15, dated December 27, 2016.

[^4]:    10 In re Union Elec. Co., File No. ER-2011-0028, Report and Order (Mo. P.S.C., July 13, 2011), at 67.
    11 In re Kansas City Power \& Light Co., No. ER-2010-0355, Report and Order (Mo. P.S.C., Apr. 12, 2011) at 124.

[^5]:    12 I note that Missouri is currently ranked "Average/2" by Regulatory Research Associates. However, citing concerns regarding the potential failure of the legislature or the Commission to take action to address regulatory lag, or if the Commission exercises authority in the Great Plains Energy and Westar Energy merger, "a reduction in the ranking may be justified." See Regulatory Research Associates, Assessment of the Missouri Public Service Commission, updated October 6, 2016.

[^6]:    13 Source: Regulatory Research Associates. The lowest return authorized for a vertically integrated electric utility was 9.00 percent given to Maui Electric Company and included a 50 basis point reduction due to the company's "inability to address certain apparent system inefficiencies" (see Decision and Order No. 31288, Public Utilities Commission of the State of Hawaii, Docket No. 2011-0092, at 107).

[^7]:    14 The average authorized return in 2016 was 9.77 percent.

[^8]:    15 Staff Revenue Requirement Cost of Service Report, at 35.

[^9]:    16 At page 50 of the Staff Revenue Requirement Cost of Service Report, Dr. Woolridge refers to authorized returns for electric utilities.

[^10]:    17 Staff Revenue Requirement Cost of Service Report, at 26.

[^11]:    18 See, Direct Testimony of Robert B. Hevert, Appendix A, at 42.
    19 Dominion Resources, Inc., Merger Press Release, September 16, 2016.
    20 Duke Energy Corporation, SEC Form 8-K, October 3, 2016.
    21 Southern Company, SEC Form 8-K, July 1, 2016.

[^12]:    22 See Moody’s Investors Service, Rating Methodology, Regulated Electric and Gas Utilities, December 23, 2013, at 10-14.

[^13]:    ${ }^{23}$ Source: SNL Financial, Bloomberg Professional. The dividend yields in Dr. Woolridge's DCF study (see Exhibit JRW-10) are calculated on the 30-, 90-, and 180-trading day periods ending November 17, 2016.

[^14]:    24 Staff Revenue Requirement Cost of Service Report, at 42.
    ${ }^{25}$ Ibid.

[^15]:    26 Ibid.
    27 See Ibid., and Exhibit JRW-10, at 6.

[^16]:    28 See Schedule RBH-R8.

[^17]:    29 Since the beginning of 2000, the long-term average P/E ratio for Dr. Woolridge's proxy group was 17.20. The 30-day average P/E ratio for the period ending December 30, 2016 was 22.06 for Dr. Woolridge’s proxy group. Source: SNL Financial. Looking forward, indicators suggest that the industry's current valuation levels may not persist. Value Line, for example, expects a decline in the $\mathrm{P} / \mathrm{E}$ ratio for all but three of the companies in Dr. Woolridge’s proxy group over the coming three to five years (See Schedule RBH-R10).
    ${ }^{30}$ Duff \& Phelps refers to the method as the "Supply Side" approach.
    31 Duff \& Phelps, 2016 SBBI Yearbook Stocks, Bonds, Bills and Inflation, at 10-28.

[^18]:    32 See Staff Revenue Requirement Cost of Service Report, Exhibit JRW-11, at 5-6 and Duff \& Phelps, 2016 SBBI Yearbook Stocks, Bonds, Bills and Inflation, at 10-28.
    Staff Revenue Requirement Cost of Service Report, at 51. Ibid.

[^19]:    35 Bonus depreciation represents an additional amount of depreciation that a company may take in the first year that a depreciable item is placed in service.
    36 Moody's Investors Service, Lower Authorized Returns Will Not Hurt Near-Term Credit Profiles, March 10, 2015, at 4.
    37 Ibid, at 5.
    38 Source: Bloomberg Professional. Represents 30-day moving average.

[^20]:    39 Staff Revenue Requirement Cost of Service Report, at 51.
    40 Direct Testimony of Robert B. Hevert, at 38-39.
    41 Staff Revenue Requirement Cost of Service Report, at 41.

[^21]:    42 Ibid., at 42.
    43 The 2002 Global Financial Settlement resolved an investigation by the U.S. Securities and Exchange Commission and the New York Attorney General's Office of a number of investment banks related to concerns about conflicts of interest that might influence the independence of investment research provided by equity analysts.
    44 Securities and Exchange Commission, 17 CFR PART 242 [Release Nos. 33-8193; 34-47384; File No. S7-30-02], RIN 3235-AI60 Regulation Analyst Certification.

[^22]:    45 Direct Testimony of Robert B. Hevert, at 45-46.
    ${ }^{46}$ See Robert S. Harris, Using Analysts' Growth Forecasts to Estimate Shareholder Required Rates of Return, Financial Management, 1986, at 66.
    ${ }^{47}$ Ibid., at 59. Emphasis added. As noted in my direct testimony, Zacks and First Call, the sources of earnings growth projections that I use in addition to Value Line, are consensus forecasts.
    48 Ibid., at 60.
    49 Robert S. Harris, Felicia C. Marston, Estimating Shareholder Risk Premia Using Analysts' Growth Forecasts, Financial Management, Summer 1992.

[^23]:    50 Ibid., at 63.
    51 In The Risk Premium Approach to Measuring a Utility's Cost of Equity, published in Financial Management, Spring 1985, Brigham, Shome and Vinson noted that "evidence in the current literature indicates that (i) analysts' forecasts are superior to forecasts based solely on time series data; and (ii) investors do rely on analysts' forecasts."
    ${ }_{52}$ Staff Revenue Requirement Cost of Service Report, at 41.
    ${ }_{53}$ Ibid., at 40.
    54 Source: Zacks, Yahoo Finance, Value Line, and individual company investor presentations.

[^24]:    55 See Staff Revenue Requirement Cost of Service Report, at 38-39.

[^25]:    56 In The Risk Premium Approach to Measuring a Utility's Cost of Equity, published in Financial Management, Spring 1985, Brigham, Shome and Vinson noted that "evidence in the current literature indicates that (1) analysts' forecasts are superior to forecasts based solely on time series data; and (2) investors do rely on analysts’ forecasts." Similarly, in a review of literature regarding the extent to which analyst forecasts are reflected in stock prices (Using Analyst's Growth Forecasts to Estimate Shareholder Required Rates of Return, Financial Management, Spring 1986), Harris noted: "VanderWeide and Carleton recently compare consensus [financial analyst forecasts] of earnings growth to 41 different historical growth measures. They conclude that 'there is overwhelming evidence that the consensus analysts' forecast of future growth is superior to historically-oriented growth measures in predicting the firm's stock price...consistent with the hypothesis that investors use analysts’ forecasts, rather than historically-oriented growth calculations, in making stock buy and sell decisions.'" The VanderWeide and Carleton study was updated in 2004 under the direction of Dr. VanderWeide. The results of the updated study were consistent with the original study's conclusions.
    ${ }^{57}$ See Staff Revenue Requirement Cost of Service Report, at 38-39.

[^26]:    58 See American Electric Power Co., Inc., Q4 2015 Earnings Call Transcript, January 28, 2016.

[^27]:    59 See American Electric Power Co., Inc., Q4 2015 Earnings Call Transcript, January 28, 2016.

[^28]:    ${ }^{60}$ See American Electric Power Co., Inc., Q1 2016 Earnings Call Transcript, April 28, 2016.
    61
    See American Electric Power Co., Inc., Q2 2016 Earnings Call Transcript, July 28, 2016.

[^29]:    ${ }^{62}$ See Staff Revenue Requirement Cost of Service Report, Exhibit JRW-11, at 1.

[^30]:    See Ibid., at 49.
    Ibid., at 48; Exhibit JRW-11, at 1, 5-6.
    ${ }^{5}$ Dr. Woolridge cites Pablo Fernandez's research; see Staff Revenue Requirement Cost of Service Report, Exhibit JRW-11, at 5.

[^31]:    66 Pablo Fernandez, Alberto Ortiz, and Isabel Fernandez Acín, Market Risk Premium used in 71 countries in 2016: a survey with 6,932 answers, IESE Business School, at 10.
    ${ }^{67}$ Staff Revenue Requirement Cost of Service Report, at 45.

[^32]:    ${ }^{68}$ See Staff Revenue Requirement Cost of Service Report, at 32.
    69 See Ibid., at 32-33 and Exhibit JRW-6. Please note that there were only nine observations for the water group and twelve for the gas company group.

[^33]:    ${ }^{70}$ See for example, Roger A. Morin, New Regulatory Finance, Public Utility Reports, Inc., 2006, at 366. Please note that Dr. Morin cites several academic articles that address the various factors that affect the M/B ratio for utilities. In addition, the notion that book values should be set at a value approaching unity by regulatory commissions has been refuted for many years. As noted by Stewart Myers in 1972: "In short, a straightforward application of the cost of capital to a book value rate base does not automatically imply that market and book values will be equal. This is an obvious but important point. If straightforward approaches did imply equality of market and book values, then there would be no need to estimate the cost of capital. It would suffice to lower (raise) allowed earnings whenever markets were above (below) book." Stewart C. Myers, The Application of Finance Theory to Public Utility Rate Cases, The Bell Journal of Economics and Management Science, Vol. 3, No. 1 (Spring 1972), at 76.
    ${ }^{71}$ Source: SNL Financial and Bloomberg Professional.

[^34]:    72 See, Roger A. Morin, New Regulatory Finance, Public Utility Reports, Inc., 2006, at 366, citing Stewart C. Myers, The Application of Finance Theory to Public Utility Rate Cases, The Bell Journal of Economics and Management Science, Vol. 3, No. 1 (Spring 1972), at 76.
    ${ }^{73}$ Roger A. Morin, New Regulatory Finance, Public Utilities Reports, Inc., 2006, at 434. [emphasis added]

[^35]:    74 Source: Value Line, downloaded as of January 10, 2017. Note that Dr. Woolridge's Exhibit JRW-6, Panel A, includes 42 observations, however using more recent data two companies were no longer in the Value Line universe and the $\mathrm{R}^{2}$ declines from approximately 0.77 to 0.54 .
    ${ }^{75} 1.00=0.393+(4.442 \% \times 0.137)$.

[^36]:    $76 \quad 0.66=(1-0.34)$.
    ${ }^{77}$ See Staff Revenue Requirement Cost of Service Report, at 17.
    78 As noted by Robert S. Harris and Felicia C. Marston, Estimating Shareholder Risk Premia Using Analysts' Growth Forecasts, Financial Management, Summer 1992, at 68, "equity risk premia... increased with the increases in the spread between corporate and government bond yields".

[^37]:    79 Exhibit JRW-11, at 3.
    80 Duff \& Phelps 2016 Valuation Handbook, John Wiley \& Sons, Inc., 2016, at Appendix 3b.
    81 Duff \& Phelps 2016 Valuation Handbook, John Wiley \& Sons, Inc., 2016, at Appendix 3b. Debt Beta coefficients for BBB-rated companies were 0.08.

[^38]:    ${ }^{82}$ See Direct Testimony of Michael P. Gorman, at 2.
    Ibid., at 29, 31, 39.
    Ibid. at 39.
    Ibid., at 46.
    Ibid., at 51.
    Ibid., at 52.

[^39]:    88 Ibid., at 24.

[^40]:    89 Ibid., at 39, Table 7.
    Ibid., at 46.
    Ibid., at 39, Table 7.

[^41]:    92 Sources: SNL Financial. Proxy Group P/E ratio calculated as an index.
    93 Direct Testimony of Michael P. Gorman, at 35.

[^42]:    94 See Direct Testimony of Michael P. Gorman at 51; Morningstar Inc., Ibbotson SBBI 2014 Classic Yearbook, at 156-157.
    95 Duff \& Phelps, 2016 Valuation Handbook: Guide to Cost of Capital, at 3-30.
    See Schedule RBH-R2.

[^43]:    97 For example, in its Report and Order in File No. GR-2014-0152 the Commission found my constant growth and Multi-Stage DCF approaches to be reasonable. Both of those models relied on analysts’ growth rates. See In the Matter of Liberty Utilities (Midstates Natural) Gas Corp. d/b/a Liberty Utilities’ Tariff Revisions Designed to Implement a General Rate Increase for Natural Gas Service in the Missouri Service Areas of the Company, File No. GR-2014-0152, at 23-24.

[^44]:    98 Ibid., at 47 and Schedule MPG-18.
    ${ }^{99}$ Ibid. at 48.
    100 Ibid., at 51.
    101 Ibid., at 49-50 and Schedule MPG-18.
    ${ }^{102} \mathrm{Mr}$. Gorman's low Market Risk Premium of 6.00 percent plus his projected risk-free rate of 3.40 percent equals an estimated market return of 9.40 percent. See Direct Testimony of Michael P. Gorman, at 48-51; Schedule MPG-18.
    ${ }^{103}$ On a rolling average basis.

[^45]:    104 Direct Testimony of Michael P. Gorman, at 50.
    105 Source: Morningstar, Inc., 2016 SBBI Appendix A Tables.

[^46]:    110 Direct Testimony of Michael P. Gorman at 41; Schedules MPG-13 and MPG-14.
    111 Ibid., at 41.
    112 Ibid., at 42.
    $1134.38 \%+2.88 \%=7.26 \% ; 4.38 \%+5.58 \%=9.96 \% ; 3.40 \%+4.25 \%=7.65 \% ; 3.40 \%+6.75 \%=\% .10 .15 \%$; Schedules MPG-13 and MPG-14
    114 Ibid., at 46.

[^47]:    Ibid. at 39.
    Ibid. at $46(2.88 \%+4.38 \%=7.26 \%$ and $4.25 \%+3.40 \%=7.65 \%)$.
    $9.96 \%=5.58 \%+4.38 \%$
    $10.15 \%=6.75 \%+3.40 \%$

[^48]:    119 Ibid. at 40.
    120 Ibid., at 40.

[^49]:    121 Source: Direct Testimony of Michael P. Gorman, Schedule MPG-13; based on five-year rolling average.

[^50]:    ${ }^{122}$ Based on Indicated Risk Premium.
    123 Those findings are supported in academic studies. For example, Dr. Roger Morin notes that: "... [p]ublished studies by Brigham, Shome, and Vinson (1985), Harris (1986), Harris and Marston (1992, 1993), Carleton, Chambers, and Lakonishok (1983), Morin (2005), and McShane (2005), and others demonstrate that, beginning in 1980, risk premiums varied inversely with the level of interest rates - rising when rates fell and declining when interest rates rose." Roger A: Morin, New Regulatory Finance, Public Utilities Reports, Inc. 2006, at 128 [clarification added].
    124 See Schedule RBH-R16. Source: Schedule MPG-13.

[^51]:    125 Serial correlation is not present or is inconclusive.
    ${ }^{126}$ See Farris M. Maddox, Donna T. Pippert, and Rodney N. Sullivan, An Empirical Study of Ex Ante Risk Premiums for the Electric Utility Industry, Financial Management, Vol. 24, No. 3, Autumn 1995, at 93.
    127 See Schedule RBH-7.
    128 See, Schedule RBH-R16.

[^52]:    ${ }_{129}$ See, for example, Schedule RBH-R6, which contains a range of results from 10.01 percent to 10.33 percent.
    130 Direct Testimony of Michael P. Gorman, at 15.
    131 Standard \& Poor’s RatingsDirect, Industry Report Card: The Outlook For U.S. Regulated Utilities Remains Stable On Increasing Capital Spending And Robust Financial Performance, December 16, 2014, at 6.

[^53]:    ${ }^{132}$ See Direct Testimony of Michael P. Gorman, at 56-57. Ibid. at 53.

[^54]:    ${ }^{134}$ See Standard \& Poor's RatingsDirect, The Outlook for U.S. Regulated Utilities Remains Stable on Increasing Capital Spending and Robust Financial Performance, December 16, 2014, at 7-20.

[^55]:    ${ }^{135}$ Analysis based on Mr. Gorman's Schedule MPG-19. See Schedule RBH-R18.
    ${ }^{136}$ Direct Testimony of Michael P. Gorman, at 56.

[^56]:    137 Moody’s Investors Service, Rating Methodology; Regulated Gas and Electric Utilities at 6 (Dec. 23, 2013).
    138 Moody's Investors Service, Regulatory Frameworks - Ratings and Credit Quality for Investor-Owned Utilities at 2 (June 18, 2010).

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