

MAWC 28
Exhibit No.:
Issues: Capital Structure and Overall
Rate of Return
Witness: Scott W. Rungren
Exhibit Type: Direct
Sponsoring Party: Missouri-American Water Company
Case No.: WR-2015-0301
SR-2015-0302
Date: July 31, 2015

MISSOURI PUBLIC SERVICE COMMISSION

**CASE NO. WR-2015-0301
CASE NO. SR-2015-0302**

DIRECT TESTIMONY

OF

SCOTT W. RUNGREN

ON BEHALF OF

MISSOURI-AMERICAN WATER COMPANY

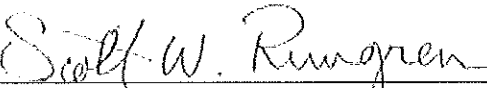
MAWC Exhibit No. 28
Date 3-21-16 Reporter TR
File No. WR-2015-0301

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

IN THE MATTER OF MISSOURI-AMERICAN)	
WATER COMPANY FOR AUTHORITY TO)	
FILE TARIFFS REFLECTING INCREASED)	CASE NO. WR-2015-0301
RATES FOR WATER AND SEWER)	CASE NO. SR-2015-0302
SERVICE)	

AFFIDAVIT OF SCOTT W. RUNGREN

Scott W. Rungren, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Direct Testimony of Scott W. Rungren"; that said testimony and schedules were prepared by him and/or under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge.



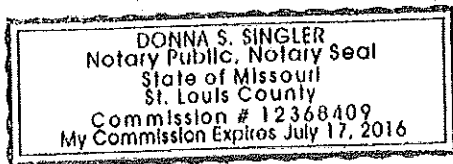
Scott W. Rungren

State of Missouri
County of St. Louis
SUBSCRIBED and sworn to
Before me this 14th day of July 2015.



Notary Public

My commission expires: July 17, 2016



**DIRECT TESTIMONY
SCOTT W. RUNGREN
MISSOURI-AMERICAN WATER COMPANY
CASE NO. WR-2015-0301
CASE NO. SR-2015-0302**

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DIRECT TESTIMONY

SCOTT W. RUNGREN

I. INTRODUCTION

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Scott W. Rungren. My business address is 727 Craig Road, St. Louis, Missouri 63141.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by American Water Works Service Company ("Service Company") as a Rates and Regulatory Analyst III. The Service Company is a subsidiary of American Water Works Company, Inc. ("American Water") that provides support services to American Water's utility subsidiaries.

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. In May of 1983, I received a Bachelor of Science degree in Business Administration with a major in Energy Management from Eastern Illinois University. In May of 1986, I received a Master of Business Administration degree with a specialization in Finance from Northern Illinois University. From 1986 to 1999, I was employed by the Illinois Commerce Commission ("Illinois Commission"). I held various positions while employed there. I joined the Finance Department of the Illinois Commission in 1987, and was promoted to Senior Financial Analyst in 1989. My principal responsibility in that role was to analyze the cost of capital, financial condition and

1 corporate structure of electric, gas, telephone, and water utilities using dividend
2 discount and risk premium models. In 1993, I transferred to the Energy Programs
3 Division where I performed research and analysis of the integrated resource plans
4 (IRPs) filed by Illinois electric utilities. In 1995 I returned to the Finance Department
5 in the role of Senior Financial Analyst. I remained in the Finance Department at the
6 Illinois Commission until February of 1999. In March of 1999, I began employment
7 with Cinergy Corp., working in the Retail Commodity Services group and focusing
8 on their Real Time Pricing program. In 2001, I began performing long-run
9 generation planning studies for Cinergy's Kentucky and Indiana service areas. In
10 2006, by which time Cinergy Corp. had merged with Duke Energy, I began working
11 in the Rates Department as a Rates Coordinator, assisting with the development of
12 cost of service studies for the electric and gas operations of Duke Energy Ohio and
13 Duke Energy Kentucky. I also prepared various rate and revenue analyses in that
14 role. In May of 2007, I joined the Service Company as a Senior Financial Analyst.
15 My current duties as a Rates and Regulatory Analyst with the Service Company
16 include the preparation of reports required by the various regulatory commissions
17 governing the jurisdictions in which American Water operates, and assisting in the
18 preparation of financing and rate-related filings for American Water's regulated
19 operating companies.

20
21 **Q. HAVE YOU PREVIOUSLY TESTIFIED IN REGULATORY MATTERS?**

22 A. Yes, I have presented testimony before the Missouri Public Service Commission
23 ("MoPSC"), and have testified before the Illinois Commission, the Iowa Utilities

1 Board, the Indiana Utility Regulatory Commission, the Kentucky Public Service
2 Commission, and the Public Utilities Commission of Ohio.

3
4 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS**
5 **PROCEEDING?**

6 A. The purpose of my testimony is to present the recommend capital structure to be used
7 for computing Missouri American Water Company's ("Company" or "MAWC")
8 weighted average cost of capital ("WACC"). The WACC is used as the authorized
9 overall rate of return on rate base. The Company's WACC reflects, among other
10 things, the rate of return on common equity recommendation presented in the Direct
11 Testimony of MAWC witness Dr. Roger Morin. In addition, I will address the
12 impact on the Company's financial and business risk of the alternative ratemaking
13 approaches discussed in *Staff's Water Utility Rate Design Analysis* filed in this rate
14 case.¹

15 **Q. HAVE YOU PREPARED ANY SCHEDULES TO ACCOMPANY YOUR**
16 **TESTIMONY?**

17 A. Yes, I have prepared Schedule SWR-1, which consists of four pages. Page one
18 contains a summary showing the Company's proposed WACC along with the pro
19 forma capital component balances at January 31, 2016. Page two shows the
20 calculation of the Company's pro forma balance and embedded cost of long-term

¹ On June 29, 2015, the Commission issued an order in this rate case directing Missouri-American Water Company to "respond to Staff's Water Utility Rate Design Analysis in the direct testimony it files as part of its general rate case filing." *Order Directing Response, Issued and Effective June 29, 2015, In the Matter of Missouri-American Water Company's Request for Authority to Implement a General Rate Increase for Water and Sewer Service Provided in Its Missouri Service Area. (Case No. WR-2015-0301).*

1 debt, page three shows the calculation of the Company's pro forma balance and
2 embedded cost of preferred stock, and page four shows the calculation of the
3 Company's pro forma balance of common equity, all as of January 31, 2016.

4 **II. RECOMMENDED CAPITAL STRUCTURE**
5 **AND OVERALL RATE OF RETURN**

6
7 **Q. WHAT CAPITAL STRUCTURE DO YOU RECOMMEND BE USED FOR**
8 **COMPUTING THE COMPANY'S WACC FOR RATEMAKING PURPOSES?**

9 A. Since this proceeding will set rates for future service, the capital structure
10 components should be developed from estimates for the period during which those
11 rates will be in effect. As a starting point, I used MAWC's actual capital structure as
12 of December 31, 2014. I then adjusted the component balances in that capital
13 structure to reflect all changes expected to occur by January 31, 2016, which is the
14 end of the proposed true-up period. This capital structure should be used to calculate
15 the WACC because it reflects the capital that will be in place to fund the Company's
16 proposed rate base. The pro forma January 31, 2016 capital structure is comprised of
17 47.51% long-term debt, 0.12% preferred stock, and 52.37% common equity, as
18 shown on Schedule SWR-1, page 1.

19
20 **Q. DO YOU BELIEVE THAT MAWC'S PRO FORMA JANUARY 31, 2016**
21 **CAPITAL STRUCTURE IS REASONABLE FOR RATEMAKING**
22 **PURPOSES?**

23 A. Yes, I do.

24

1 Q. HOW DID YOU DETERMINE THAT CAPITAL STRUCTURE IS
2 REASONABLE?

3 A. To determine whether MAWC's pro forma January 31, 2016 capital structure is
4 reasonable for ratemaking purposes, I examined the average common equity ratios of
5 the proxy group of nine water companies that MAWC witness Dr. Roger Morin relied
6 on to perform his cost of equity analysis in this case. Specifically, I compared
7 MAWC's common equity ratio in my proposed capital structure to the average equity
8 ratio of the water companies in Dr. Morin's proxy group at December 31, 2014. The
9 equity ratios for each company in the proxy group were obtained from the Value Line
10 Investment Survey reports published on April 17, 2015. I excluded one company,
11 Consolidated Water Company ("CWC"), because it has an equity ratio of 100%. The
12 remaining eight utilities and their corresponding equity ratios are shown in the table
13 below:

<u>Company</u>	<u>Equity Ratio at 12/31/14</u>
American States Water	60.90%
American Water Works	47.40%
Aqua America	51.50%
California Water	59.90%
Connecticut Water Service	54.20%
Middlesex Water	58.80%
SJW Corp.	48.40%
York Water	55.20%
Average	54.54%

14
15 As of the month ending December 2014, the average common equity ratio of Dr.
16 Morin's water company proxy group (excluding CWC) was 54.54%, with a standard
17 deviation of 4.82%, representing a range of 49.72% - 59.36% around the mean of
18 54.54%. Thus, MAWC's pro forma January 31, 2016 common equity ratio of

1 52.37% is well within this range, and is actually slightly lower than the average of the
2 peer group noted above.

3
4 To further check the reasonableness of my proposed capital structure, I also examined
5 Value Line's projected equity ratios for the eight water utilities as published in the
6 same Value Line reports discussed above. Based on the Value Line projections the
7 average common equity ratio for the eight water utilities will be 53.3% in 2015,
8 52.6% in 2016, and 52.4% over the 2018-2020 period. Thus, MAWC's pro forma
9 January 31, 2016 equity ratio is virtually identical to Value Line's projected equity
10 ratios for the eight water utilities.

11
12 Based on these comparisons, I concluded that MAWC's pro forma January 31, 2016
13 capital structure is reasonable and, therefore, should be used to compute the
14 Company's WACC in this proceeding.

15

16 **Q. DID YOU MAKE ANY PRO FORMA ADJUSTMENTS TO MAWC'S**
17 **PRINCIPAL AMOUNT OF LONG-TERM DEBT?**

18 A. Yes, I did. The Company's pro forma principal amount of long-term debt at January
19 31, 2016 reflects a \$20 million issuance planned for mid-August 2015. This is
20 expected to be a thirty-year taxable bond issued through American Water Capital
21 Corp. ("AWCC"), which is American Water's financing subsidiary. The assumed
22 interest rate on this new issuance is 4.00%, with issuance costs projected to be 1.03%.
23 In addition, MAWC's long-term debt carrying value was adjusted to reflect the
24 amortization of debt issuance expense and debt discount that will occur during the pro

1 forma period. The pro forma carrying value of long-term debt at January 31, 2016 is
2 \$480,791,318 as shown on Schedule SWR-1, pages 1 and 2.

3

4 **Q. WHAT IS MAWC'S COST OF LONG-TERM DEBT?**

5 A. MAWC's pro forma January 31, 2016 cost of long-term debt is 5.47%, as shown on
6 Schedule SWR-1, page 1. The computation of this cost is shown on Schedule SWR-
7 1, page 2.

8

9 **Q. PLEASE DESCRIBE AWCC.**

10 A. AWCC is a corporation organized under Delaware law with its principal office in
11 Voorhees, New Jersey. AWCC is a wholly-owned subsidiary of American Water
12 dedicated to providing financial services to American Water's water and wastewater
13 service subsidiaries by aggregating the financing requirements of such subsidiaries,
14 and creating larger and more cost efficient debt issues at more attractive interest rates
15 and lower transaction costs than would otherwise be available for the subsidiaries.

16

17 **Q. DOES AWCC PROVIDE A COST EFFECTIVE MEANS FOR MAWC TO
18 OBTAIN LONG-TERM DEBT FINANCING?**

19 A. Yes, it does. AWCC is generally able to arrange for the issuance of long-term debt
20 on terms more favorable than MAWC could obtain if it issued its own debt outside of
21 AWCC (i.e., obtaining debt from a third-party lender). MAWC also incurs lower
22 transaction costs because of its participation in the AWCC financing arrangement.

23

1 **Q. HOW DOES AWCC RECOVER THE COSTS INCURRED TO PROVIDE**
2 **FINANCIAL SERVICES TO MAWC AND OTHER PARTICIPANTS?**

3 A. The costs incurred by AWCC in connection with each long-term borrowing by
4 AWCC are divided among each participant in proportion to the principal amount of
5 that borrowing that is loaned to that participant. Such issuance costs are less (per
6 dollar of debt issued) than the costs that each participant (including MAWC) would
7 incur by issuing debt on its own behalf.

8
9 **Q. PLEASE EXPLAIN THE PRO FORMA ADJUSTMENT YOU MADE TO**
10 **MAWC'S PREFERRED STOCK BALANCE.**

11 A. I started with the Company's preferred stock balance as of December 31, 2014 and
12 then made adjustments to reflect a sinking fund payment of \$250,000 that will occur
13 on November 1, 2015, and the appropriate amortization of the issuance expense that
14 will occur during the pro forma period. The Company's pro forma adjusted preferred
15 stock balance is \$1,227,850, as shown on Schedule SWR-1, pages 1 and 3.

16
17 **Q. WHAT IS MAWC'S COST OF PREFERRED STOCK?**

18 A. MAWC's pro forma January 31, 2016 cost of preferred stock is 9.46%, as shown on
19 Schedule SWR-1, pages 1 and 3.

20
21 **Q. PLEASE EXPLAIN THE PRO FORMA ADJUSTMENTS YOU MADE TO**
22 **MAWC'S COMMON EQUITY BALANCE.**

23 A. Starting with the Company's actual common equity balance at December 31, 2014, I
24 made a pro forma adjustment to reflect MAWC's \$30,000,000 common equity

1 infusion that occurred in May 2015 in the form of paid-in capital from its parent,
2 American Water. American Water currently owns 100% of the outstanding common
3 stock of MAWC. The funds from this equity infusion were used to pay down short-
4 term debt that had been employed to temporarily fund additions to utility property.

5

6 **Q. WHAT OTHER ADJUSTMENT DID YOU MAKE TO MAWC'S COMMON**
7 **EQUITY BALANCE?**

8 A. I adjusted MAWC's December 31, 2014 retained earnings balance, which is a
9 component of common equity, to capture the changes expected to occur by the end of
10 the proposed true-up period ending January 31, 2016. Specifically, I added net
11 income and subtracted dividend payments expected to occur during that period, which
12 results in a net pro forma increase to retained earnings of \$14,549,475. Adding that
13 increment to the December 31, 2014 retained earnings balance produces a total pro
14 forma common equity balance of \$529,870,981 at January 31, 2016, as shown on
15 Schedule SWR-1, pages 1 and 4.

16

17 **Q. HAVE YOU REVIEWED THE TESTIMONY OF DR. ROGER MORIN, THE**
18 **COMPANY'S COST OF EQUITY WITNESS IN THIS CASE?**

19 A. Yes, I have.

20

21 **Q. WHAT COST RATE HAVE YOU APPLIED TO MAWC'S COMMON**
22 **EQUITY COMPONENT IN THIS CASE?**

23 A. The Company has requested and used a cost of equity of 10.70%. This cost of
24 common equity lies at the upper portion of a range of ROEs developed and

1 recommended by Dr. Morin, and is applied to the Company's pro forma capital
2 structure to arrive at the 8.21% overall weighted cost of capital proposed in the
3 Company's filing. This is shown on page 1 of Schedule SWR-1.
4

5 **Q. IS DR. MORIN'S RECOMMENDED COST OF EQUITY A REASONABLE**
6 **DETERMINATION OF THE INVESTOR-REQUIRED RETURN ON EQUITY**
7 **FOR MAWC IN THIS CASE?**

8 A. Yes, it is. It is certainly a reasonable and valid recommendation for the Company to
9 utilize as the market-required return on equity since it applies to the water utilities in
10 Dr. Morin's proxy group which have business and financial risks similar to those of
11 the Company. The Company has had a tremendous need for capital since the last rate
12 case, and this need will continue into the pro forma period and beyond. The
13 Company's rates should be established using a cost of capital reflective of rates
14 authorized for other water utilities and other utility companies with similar risk
15 profiles, particularly those of other regulated American Water subsidiaries with which
16 the Company must compete for capital.
17

18 **III. IMPACT OF ALTERNATIVE RATEMAKING APPROACHES**
19 **ON MISSOURI-AMERICAN WATER COMPANY'S FINANCIAL**
20 **AND BUSINESS RISKS**
21

22 **Q. PLEASE EXPLAIN FINANCIAL RISK AND BUSINESS RISK.**

23 A. A utility's cost of equity is impacted significantly by its financial and business risks.
24 Financial risk refers to the amount of debt a business incurs to finance its operations.
25 As Dr. Morin explains in his direct testimony, taking on higher levels of debt or
26 financial liability increases the costs of both debt and equity financing to the utility.

1 Business risk derives from the probability that a company's cash flows will not be
2 sufficient to cover its operating expenses (e.g., the cost of goods sold, rent and
3 wages). Unlike financial risk, business risk is independent of the amount of debt
4 incurred by the company. In his direct testimony Dr. Morin explains the impact of
5 MAWC's business risks on his cost of equity recommendation and the potential
6 impact that increased financial risk would have on his cost of equity recommendation.

7
8 **Q. WOULD THE ADOPTION OF MAWC'S PROPOSED REVENUE**
9 **STABILIZATION MECHANISM AFFECT MAWC'S FINANCIAL OR**
10 **BUSINESS RISK?**

11 A. The risk impact, if any, of a revenue stabilization mechanism ("RSM") would be on a
12 utility's business risk (e.g., weather or failure to meet sales forecasts). In fact, an
13 element of business risk addressed by an RSM is the chance that cooler, wetter
14 weather will result in a revenue level that is lower than the authorized level.
15 However, the empirical evidence demonstrates that revenue decoupling adjustments
16 are both surcharges for under-collections of revenues for fixed costs and refunds of
17 over-collections of revenues.² In the refund situation, the utility has foregone the
18 opportunity to collect more revenue than the amount authorized in its last general rate
19 case. While opponents of decoupling tend to testify extensively about the risk
20 reduction associated with the possibility of surcharges to adjust for under-collection
21 of expenses, acknowledgements of lost opportunities associated with possible refunds
22 are far more infrequent. In essence, a company is surrendering some upside revenue
23 potential associated with weather conditions that result in a higher-than-expected

² Pamela Morgan, *A Decade of Decoupling for U.S. Energy Industries*, Feb. 2013

1 level of sales in exchange for some downside protection against the potential that
2 weather conditions will cause lower-than-expected sales.

3
4 Another element of business risk that an RSM could affect is the failure to meet sales
5 forecasts. It is reasonable to assume that the revenue forecast upon which rates are
6 based is the revenue forecast that the commission believes is most likely to represent
7 the utility's actual revenue. If a utility is consistently failing to meet its revenue
8 forecast – likely because the revenue forecast does not properly account for
9 conservation – then that is a shortcoming of regulation that needs to be corrected and
10 not an element of risk for which there needs to be an adjustment.³ Thus, an RSM
11 would simply provide MAWC with the ability to collect the revenue that the
12 Commission found to be appropriate.

13

14 **Q. IF THE COMMISSION WERE TO ADOPT THE COMPANY'S PROPOSED**
15 **RSM IN THIS CASE, SHOULD THE COMPANY'S ALLOWED COST OF**
16 **CAPITAL OR RETURN ON EQUITY ("ROE") BE ADJUSTED?**

17 A. No, it should not. A number of commissions addressing the ROE issue have noted
18 the absence of empirical evidence regarding how, if at all, an RSM impacts a utility's
19 business risk.⁴ This absence of evidence is not surprising since, as Company witness
20 Dr. Roger Morin states, investors generally do not associate specific increments to

³ See Roach DT and Tinsley DT.

⁴ Pamela Morgan, *A Decade of Decoupling for U.S. Energy Industries*, Feb. 2013; Wharton, Vilbert, Goldberg & Brown, *The Impact of Decoupling on the Cost of Capital: An Empirical Investigation*, The Brattle Group, February 2011.

1 their return requirements with specific rate structures.⁵ Ultimately, to the extent that
2 RSMs have been adopted in over 30 states, it is reasonable to conclude that the
3 market-required cost of common equity for water utilities already incorporates the
4 impact of any risk-mitigation attributable to RSMs. Investors are aware that
5 alternative regulatory mechanisms such as RSMs have been approved to help mitigate
6 the variability of weather and declining customer consumption, and such information
7 is already taken into account by the market.

8
9 In fact, the water companies in Dr. Morin's proxy group have approved RSMs and
10 other alternative ratemaking approaches that are not currently available to MAWC.
11 As a result, the impact of these alternative ratemaking approaches is already reflected
12 in the capital market data of Dr. Morin's proxy group companies. Since Dr. Morin's
13 proxy group includes utilities with RSMs and other alternative ratemaking
14 approaches, any corresponding risk reduction and ROE impact is already reflected in
15 the cost of common equity he derived for the companies in his proxy group and
16 recommended for MAWC. Consequently, any downward adjustment to MAWC's
17 cost of common equity to capture the impact of an RSM would be redundant and
18 would overstate the degree to which business risk has been reduced by the RSM. For
19 all of these reasons, there is no basis to apply a downward adjustment to MAWC's
20 cost of common equity in the event that the Commission approves the adoption of the
21 Company's proposed RSM.

⁵ As Dr. Morin stated in his Direct Testimony, "...it is important to note that investors generally do not associate specific increments to their return requirements with specific rate structures. Rather, investors tend to look at the totality of regulatory and ratemaking approaches in place relative to those in place at comparable companies when assessing risk." (Morin DT). *See also, Staff's Water Utility Rate Design Analysis* filed in this rate case at unnumbered pp. 8-10.

1

2 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

3 **A. Yes, it does.**

Missouri-American Water Company
Weighted Average Cost of Capital
Pro Forma at January 31, 2016
Case No. WR-2015-0301
Case No. SR-2015-0302

<u>Class of Capital</u>	<u>Amount</u>	<u>Percent of Total</u>	<u>Cost Rate</u>	<u>Weighted Cost of Capital</u>
Long-Term Debt	\$480,791,318	47.51%	5.47%	2.60%
Preferred Stock	1,227,850	0.12%	9.46%	0.01%
Common Equity	<u>529,870,981</u>	<u>52.37%</u>	10.70%	<u>5.60%</u>
Total Capitalization	<u><u>\$1,011,890,149</u></u>	<u><u>100.00%</u></u>		<u><u>8.21%</u></u>

Missouri-American Water Company
Pro Forma Cost of Preferred Stock at January 31, 2016
Case No. WR-2015-0301
Case No. SR-2015-0302

<u>Type, Par Value</u>	<u>Dividend Rate</u>	<u>Date Issued</u>	<u>Amount Outstanding @ 12/31/14</u>	<u>Adjustments</u>	<u>Amount Outstanding @ 1/31/16</u>	<u>Unamortized Issuance Expense @ 12/31/14</u>	<u>Adjustments</u>	<u>Unamortized Issuance Expense @ 1/31/16</u>	<u>Carrying Value @ 1/31/16</u>	<u>Annual Amortization</u>	<u>Annual Dividends</u>	<u>Total Annual Cost</u>
Preference Stock \$100 par	9.18%	10/3/91	<u>\$1,500,000</u>	<u>(\$250,000)</u>	<u>\$1,250,000</u>	<u>\$23,690</u>	<u>(\$1,540)</u>	<u>\$22,150</u>	<u>\$1,227,850</u>	<u>\$1,421</u>	<u>\$114,750</u>	<u>\$116,171</u>
Total Preferred Stock			<u>\$1,500,000</u>	<u>(\$250,000)</u>	<u>\$1,250,000</u>	<u>\$23,690</u>	<u>(\$1,540)</u>	<u>\$22,150</u>	<u>\$1,227,850</u>	<u>\$1,421</u>	<u>\$114,750</u>	<u>\$116,171</u>
Total Cost of Preferred Stock = [Total Annual Cost/Carrying Value]												<u>9.46%</u>

