MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT COST OF SERVICE APPENDICES

VEOLIA ENERY KANSAS CITY, INC

CASE NO. HR-2011-0241

Jefferson City, Missouri August 2011

MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT
COST OF SERVICE

APPENDIX 1

Staff Credentials

VEOLIA ENERY KANSAS CITY, INC

CASE NO. HR-2011-0241

APPENDIX 1

STAFF CREDENTIALS TABLE OF CONTENTS

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Daniel I. Beck, P.E.

Supervisor of the Engineering Analysis Section of the Energy Department

Utility Operations Division

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

I graduated with a Bachelor of Science Degree in Industrial Engineering from the

University of Missouri at Columbia. Upon graduation, I was employed by the Navy Plant

Representative Office in St. Louis, Missouri as an Industrial Engineer. I began my employment with

the Missouri Public Service Commission (Commission) in November, 1987, in the Research and

Planning Department of the Utility Division (later renamed the Economic Analysis Department of

the Policy and Planning Division) where my duties consisted of weather normalization, load

forecasting, integrated resource planning, cost-of-service and rate design. In December, 1997, I was

transferred to the Tariffs/Rate Design Section of the Commission's Gas Department where my duties

include weather normalization, annualization, tariff review, cost-of-service and rate design. Since

June 2001, I have been in the Engineering Analysis Section of the Energy Department, which was

created by combining the Gas and Electric Departments. I became the Supervisor of the

Engineering Analysis Section, Energy Department, Utility Operations Division in November 2005.

I am a Registered Professional Engineer in the State of Missouri. My registration number

is E-26953.

List of Cases in which prepared testimony was presented by: DANIEL I. BECK

| Company Name | Case No. |
|--|---------------------------|
| Union Electric Company | EO-87-175 |
| The Empire District Electric Company | EO-91-74 |
| Missouri Public Service | ER-93-37 |
| St. Joseph Power & Light Company | ER-93-41 |
| The Empire District Electric Company | ER-94-174 |
| Union Electric Company | EM-96-149 |
| Laclede Gas Company | GR-96-193 |
| Missouri Gas Energy | GR-96-285 |
| Kansas City Power & Light Company | ET-97-113 |
| Associated Natural Gas Company | GR-97-272 |
| Union Electric Company | GR-97-393 |
| Missouri Gas Energy | GR-98-140 |
| Missouri Gas Energy | GT-98-237 |
| Ozark Natural Gas Company, Inc. | GA-98-227 |
| Laclede Gas Company | GR-98-374 |
| St. Joseph Power & Light Company | GR-99-246 |
| Laclede Gas Company | GR-99-315 |
| Utilicorp United Inc. & St. Joseph Light & Power Co. | EM-2000-292 |
| Union Electric Company d/b/a AmerenUE | GR-2000-512 |
| Missouri Gas Energy | GR-2001-292 |
| Laclede Gas Company | GR-2001-629 |
| Union Electric Company d/b/a AmerenUE | GT-2002-70 |
| Laclede Gas Company | GR-2001-629 |
| Laclede Gas Company | GR-2002-356 |
| Union Electric Company d/b/a AmerenUE | GR-2003-0517 |
| Missouri Gas Energy | GR-2004-0209 |
| Atmos Energy Corporation | GR-2006-0387 |
| Missouri Gas Energy | GR-2006-0422 |
| Union Electric Company d/b/a AmerenUE | GR-2007-0003 |
| The Empire District Electric Company | EO-2007-0029/EE-2007-0030 |
| Laclede Gas Company | GR-2007-0208 |
| The Empire District Electric Company | EO-2008-0043 |
| Missouri Gas Utility, Inc. | GR-2008-0060 |
| The Empire District Electric Company | ER-2008-0093 |

| Company Name | Case No. |
|--|--------------|
| Trigen Kansas City Energy Corporation | HR-2008-0300 |
| Union Electric Company d/b/a AmerenUE | ER-2008-0318 |
| Kansas City Power & Light Company | ER-2009-0089 |
| KCP&L Greater Missouri Operations Company | ER-2009-0090 |
| Missouri Gas Energy | GR-2009-0355 |
| The Empire District Gas Company | GR-2009-0434 |
| Union Electric Company d/b/a AmerenUE | ER-2010-0036 |
| Laclede Gas Company | GR-2010-0171 |
| Atmos Energy Corporation | GR-2010-0192 |
| Kansas City Power & Light Company | ER-2010-0355 |
| KCP&L Greater Missouri Operations Company | ER-2010-0356 |
| Union Electric Company d/b/a Ameren Missouri | GR-2010-0363 |

Kim Cox

EDUCATION

Bachelor of Science Central Missouri State University, Warrensburg, MO – May 1996

PROFESSIONAL EXPERIENCE

I am currently employed as a Rate and Tariff Examiner III for the Missouri Public Service Commission (Commission). I began my employment with the Commission on July 13, 2009. Before coming to the Commission I was in the regulatory field for ten years where I held the position of a Quality Assurance Analyst.

Since starting with the Commission I have completed the Consumer Affairs Training held by NARUC and Economics of Efficiency and Demand Response. I have assisted with gathering data from the Local Distribution Companies for the Demand Side Management study performed by Kema.

I have provided a Staff Recommendation on the following:

- Missouri Gas Utility Certificate of Convenience and Necessity case GA-2010-0012;
- Missouri Gas Utility Certificate of Convenience and Necessity, case GA-2010-0189;
- Laclede Gas Company Winter Season PGA, case GR-2010-0138;
- Union Electric d/b/a Ameren UE Winter PGA, case GR-2009-0337;
- The Empire District Gas Company's Winter Season PGA, case GR-2011-0108.

I have provided written testimony on the following:

- Weather-Normalized Sales and Coincident-Peak-Day Demand for The Empire District Gas Company, Case No. GR-2009-0434;
- Weather-Normalized Sales, Coincident-Peak-Day Demand and Blocks for Laclede Gas, Case No. GR-2010-0171;
- Weather-Normalized Sales, Coincident-Peak-Day Demand and Blocks for AmerenUE, Case No. GR-2010-0363;
- Weather-Normalized Sales for Southern Missouri Natural Gas, Case No. GR-2010-0347;
- Weather-Normalized Sales and Coincident-Peak-Day Demand for Atmos, Case No. GR-2010-0192.

CARY G. FEATHERSTONE

SUMMARY OF RATE CASE INVOLVEMENT

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|--------------------------|--|--|-------------|
| 1980 | ER-80-53 | St. Joseph Light & Power Company (electric rate increase) | Direct | Stipulated |
| 1980 | OR-80-54 | St. Joseph Light & Power Company (transit rate increase) | Direct | Stipulated |
| 1980 | HR-80-55 | St. Joseph Light & Power Company (industrial steam rate increase) | Direct | Stipulated |
| 1980 | GR-80-173 | The Gas Service Company (natural gas rate increase) | Direct | Stipulated |
| 1980 | GR-80-249 Coordinated | Rich Hill-Hume Gas Company (natural gas rate increase) | No Testimony filed- revenues & rate base | Stipulated |
| 1980 | TR-80-235 | United Telephone Company of Missouri (telephone rate increase) | Direct- construction work in progress Rebuttal | Contested |
| 1981 | ER-81-42 | Kansas City Power & Light Company (electric rate increase) | Direct-payroll & payroll related benefits; cash working capital Rebuttal | Contested |
| 1981 | TR-81-208 | Southwestern Bell Telephone Company (telephone rate increase) | Direct-cash working capital; construction work in progress; income taxes-flow-through Rebuttal Surrebuttal | Contested |
| 1981 | TR-81-302 | United Telephone Company of Missouri (telephone rate increase) | Direct- construction work in progress | Stipulated |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|----------------------------|---|---|-------------|
| 1981 | TO-82-3 | Investigation of Equal Life Group and Remaining Life Depreciation Rates (telephone depreciation case) | Direct- construction work in progress | Contested |
| 1982 | ER-82-66 and HR-82-67 | Kansas City Power & Light Company (electric & district steam heating rate increase) | Direct- fuel & purchased power; fuel inventories Rebuttal Surrebuttal | Contested |
| 1982 | TR-82-199 | Southwestern Bell Telephone Company (telephone rate increase) | Direct- revenues & directory advertising | Contested |
| 1983 | EO-83-9 | Investigation and Audit of Forecasted Fuel Expense of Kansas City Power & Light Company (electric forecasted fuel true-up) | Direct | Contested |
| 1983 | ER-83-49 | Kansas City Power & Light Company (electric rate increase) | Direct- fuel & fuel inventories Rebuttal Surrebuttal | Contested |
| 1983 | TR-83-253 | Southwestern Bell Telephone Company (telephone rate increase - ATT Divesture Case) | Direct- revenues & directory advertising | Contested |
| 1984 | EO-84-4 | Investigation and Audit of Forecasted Fuel Expense of Kansas City Power & Light Company (electric forecasted fuel true-up) | Direct | Contested |
| 1985 | ER-85-128 and EO-85-185 | Kansas City Power & Light Company (electric rate increase- Wolf Creek | Direct- fuel inventories; coordinated | Contested |
| | Coordinated | Nuclear Generating Unit Case) | construction audit | |
| 1987 | HO-86-139 | Kansas City Power & Light Company (district steam heating | Direct- policy testimony on abandonment of | Contested |
| | Coordinated | discontinuance of public utility and rate increase) | steam service Rebuttal Surrebuttal | |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|---|---|--|-------------------------------------|
| 1988 | TC-89-14 Coordinated Directory | Southwestern Bell Telephone Company (telephone rate complaint case) | Direct- directory advertising Surrebuttal | Contested |
| 1989 | TR-89-182 and TC-90-75 | GTE North, Incorporated (telephone rate increase) | Direct- directory advertising Rebuttal Surrebuttal | Contested Decided Feb 9, 1990 |
| 1990 | GR-90-50 Coordinated | Kansas Power & Light - Gas Service Division (natural gas rate increase) | Direct- prudency review of natural gas explosions | Stipulated |
| 1990 | ER-90-101 Coordinated | UtiliCorp United Inc., Missouri Public Service Division (electric rate increase- Sibley Generating Station Life Extension Case) | Direct- Corporate Costs and Merger & Acquisition Costs Surrebuttal | Contested |
| 1990 | GR-90-198 Coordinated | UtiliCorp United, Inc., Missouri Public Service Division (natural gas rate increase) | Direct- Corporate Costs and Merger & Acquisition Costs | Stipulated |
| 1990 | GR-90-152 | Associated Natural Gas Company (natural gas rate increase) | Rebuttal- acquisition adjustment; merger costs/savings | Stipulated |
| 1991 | EM-91-213 | Kansas Power & Light - Gas Service Division (natural gas acquisition/merger case) | Rebuttal- acquisition adjustment; merger costs/savings tracking | Contested |
| 1991 | EO-91-358 and EO-91-360 Coordinated | UtiliCorp United Inc., Missouri Public Service Division (electric accounting authority orders) | Rebuttal- plant construction cost deferral recovery; purchased power cost recovery deferral | Contested |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|---|---|---|-------------|
| 1991 | GO-91-359 | UtiliCorp United Inc., | Memorandum | Stipulated |
| | Coordinated | Missouri Public Service Division (natural gas accounting authority order) | Recommendation- Service Line Replacement Program cost recovery deferral | |
| 1993 | TC-93-224 and TO-93-192 Coordinated Directory | Southwestern Bell Telephone Company (telephone rate complaint case) | Direct- directory advertising Rebuttal Surrebuttal | Contested |
| 1993 | TR-93-181 | United Telephone Company of Missouri (telephone rate increase) | Direct- directory advertising Surrebuttal | Contested |
| 1993 | GM-94-40 | Western Resources, Inc. and Southern Union Company (natural gas sale of Missouri property) | Rebuttal- acquisition adjustment; merger costs/savings tracking | Stipulated |
| 1994 | GM-94-252 | UtiliCorp United Inc., acquisition | Rebuttal- | Contested |
| | Coordinated | of Missouri Gas Company and Missouri Pipeline Company (natural gasacquisition case) | acquisition of assets case | |
| 1994 | GA-94-325 | UtiliCorp United Inc., expansion of | Rebuttal- natural | Contested |
| | Coordinated | natural gas to City of Rolla, MO (natural gas certificate case) | gas expansion | |
| 1995 | GR-95-160 | United Cities Gas Company | Direct- affiliated | Contested |
| | Coordinated | (natural gas rate increase) | transactions; plant | |
| 1995 | ER-95-279 | Empire District Electric Company | Direct- fuel & | Stipulated |
| | Coordinated | (electric rate increase) | purchased power; fuel inventories | |
| 1996 | GA-96-130 | UtiliCorp United, Inc./Missouri Pipeline Company (natural gas certificate case) | Rebuttal- natural gas expansion | Contested |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|---|--|--|---|
| 1996 | EM-96-149 Coordinated | Union Electric Company merger with CIPSCO Incorporated (electric and natural gas- acquisition/merger case) | Rebuttal- acquisition adjustment; merger costs/savings | Stipulated |
| 1996 | GR-96-285 Coordinated | Missouri Gas Energy Division of Southern Union Company (natural gas rate increase) | Direct- merger savings recovery; property taxes Rebuttal Surrebuttal | Contested |
| 1996 | ER-97-82 | Empire District Electric Company (electric interim rate increase case) | Rebuttal- fuel & purchased power | Contested |
| 1997 | GA-97-132 | UtiliCorp United Inc./Missouri Public Service Company (natural gas—certificate case) | Rebuttal- natural gas expansion | Contested |
| 1997 | GA-97-133 | Missouri Gas Company (natural gas—certificate case) | Rebuttal- natural gas expansion | Contested |
| 1997 | EC-97-362 and EO-97-144 | UtiliCorp United Inc./Missouri Public Service (electric rate complaint case) | Direct fuel & purchased power; fuel inventories Verified Statement | Contested Commission Denied Motion |
| 1997 | ER-97-394 and EC-98-126 Coordinated | UtiliCorp United Inc./Missouri Public Service (electric rate increase and rate complaint case) | Direct- fuel & purchased power; fuel inventories; re-organizational costs Rebuttal Surrebuttal | Contested |
| 1997 | EM-97-395 | UtiliCorp United Inc./Missouri Public Service (electric-application to spin-off generating assets to EWG subsidiary) | Rebuttal- plant assets & purchased power agreements | Withdrawn |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | Case |
|-------------|--------------------------------|---|--|---------------------------|
| 1998 | GR-98-140 | Missouri Gas Energy Division of Southern Union Company | Testimony in Support of | Contested |
| | Coordinated | (natural gas rate increase) | Stipulation And Agreement | |
| 1999 | EM-97-515 | Kansas City Power & Light Company merger with Western | Rebuttal- acquisition | Stipulated (Merger |
| | Coordinated | Resources, Inc. (electric acquisition/ merger case) | adjustment; merger costs/savings tracking | eventually terminated) |
| 2000 | EM-2000-292 | UtiliCorp United Inc. merger with St. Joseph Light & Power Company | Rebuttal- acquisition | Contested (Merger |
| | Coordinated | (electric, natural gas and industrial steam acquisition/ merger case) | adjustment; merger costs/savings tracking | closed) |
| 2000 | EM-2000-369 | UtiliCorp United Inc. merger with Empire District Electric Company | Rebuttal- acquisition | Contested (Merger |
| | Coordinated | (electric acquisition/ merger case) | adjustment; merger costs/savings tracking | eventually terminated) |
| 2001 | ER-2001-299 | Empire District Electric Company (electric rate increase) | Direct- income taxes; cost of | Contested |
| | Coordinated | | removal; plant construction costs; fuel- interim energy charge Surrebuttal True-Up Direct | |
| 2001 | ER-2001-672 and EC-2002-265 | UtiliCorp United Inc./Missouri Public Service Company | Verified Statement Direct- capacity | Stipulated |
| | Coordinated | (electric rate increase) | purchased power agreement; plant recovery Rebuttal Surrebuttal | |
| 2002 | ER-2002-424 | Empire District Electric Company (electric rate increase) | Direct- fuel-interim energy charge | Stipulated |
| | Coordinated | (| Surrebuttal | |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|---|--|---|-------------|
| 2003 | ER-2004-0034 and HR-2004-0024 (Consolidated) Coordinated | Aquila, Inc., (formerly UtiliCorp United Inc) d/b/a Aquila Networks-MPS and Aquila Networks-L&P (electric & industrial steam rate increases) | Direct- acquisition adjustment; merger savings tracking Rebuttal Surrebuttal | Stipulated |
| 2004 | GR-2004-0072 Coordinated | Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P (natural gas rate increase) | Direct- acquisition adjustment; merger savings tracking Rebuttal | Stipulated |
| 2005 | HC-2005-0331 Coordinated | Trigen Kansas City Energy [Jackson County Complaint relocation of plant for Sprint Arena] (steam complaint case) | Cross examination- relocation of plant assets | Contested |
| 2005 | EO-2005-0156 Coordinated | Aquila, Inc., d/b/a Aquila Networks- MPS (electric- South Harper Generating Station asset valuation case) | Rebuttal- plant valuation Surrebuttal | Stipulated |
| 2005 | ER-2005-0436 Coordinated | Aquila, Inc., d/b/a Aquila Networks- MPS and Aquila Networks- L&P (electric rate increase) | Direct- interim energy charge; fuel; plant construction; capacity planning Rebuttal Surrebuttal | Stipulated |
| 2005 | HR-2005-0450 Coordinated | Aquila, Inc., d/b/a Aquila Networks- L&P (industrial steam rate increase) | Direct | Stipulated |
| 2006 | ER-2006-0314 Coordinated | Kansas City Power & Light Company (electric rate increase) | Direct-construction audits Rebuttal- allocations Surrebuttal- allocations | Contested |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|---|--|---|-------------|
| 2006 | WR-2006-0425 Coordinated | Algonquin Water Resources (water & sewer rate increases) | Rebuttal- unrecorded plant; contributions in aid of construction Surrebuttal unrecorded plant; contributions in aid of construction | Contested |
| 2007 | ER-2007-0004 Coordinated | Aquila, Inc., d/b/a Aquila Networks- MPS and Aquila Networks- L&P (electric rate increase) | Direct-fuel clause, fuel, capacity planning Rebuttal Surrebuttal | Contested |
| 2007 | HO-2007-0419 Coordinated | Trigen Kansas City Energy [sale of coal purchase contract] (steam) | Recommendation Memorandum | Stipulated |
| 2007 | HR-2007-0028, HR-2007-0399 and HR-2008-0340 HC-2010-0235 | Aquila, Inc., d/b/a Aquila Networks- L&P [Industrial Steam Fuel Clause Review] (industrial steam fuel clause review) | | Pending |
| 2008 | HR-2008-0300 Coordinated | Trigen Kansas City Energy (steam rate increase) | Direct - sponsor Utility Services portion of the Cost of Service Report, overview of rate case, plant review and plant additions, fuel and income taxes | Stipulated |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony/Issue | <u>Case</u> |
|-------------|----------------------------------|---|--|-------------|
| 2009 | ER-2009-089 | Kansas City Power & Light Company (electric rate increase) | Direct- sponsor Utility Services Cost of Service Report, | Stipulated |
| | Coordinated | | Additional Amortizations and Iatan 1 construction Rebuttal- allocations Surrebuttal- allocations | |
| 2009 | ER-2009-090 Coordinated | KCPL Greater Missouri Operations Company (former Aquila, Inc. Missouri electric properties) (electric rate increase) | Direct- sponsor Utility Services Cost of Service Report | Stipulated |
| | | | Surrebuttal- capacity planning | |
| 2009 | HR-2009-092 | KCPL Greater Missouri Operations Company (former Aquila, Inc. | Direct- sponsor Utility Services | Stipulated |
| | Coordinated | Missouri electric properties) (industrial steam rate increase) | Cost of Service Report | |
| 2010 | SR-2010-0110 and WR-2010-0111 | Lake Region Water and Sewer Company (water & sewer rate increase) | Direct- sponsor Utility Services Cost of Service | Contested |
| | Coordinated | | Report Surrebuttal True-up Direct Reports to Commission | |

| | | | Type of | |
|------|-----------------------------|--|---|-----------|
| Year | Case No. | Utility | Testimony/Issue | Case |
| | | | | |
| 2010 | ER-2010-0355 | Kansas City Power & Light | Direct- sponsor | Contested |
| | | Company | Utility Services | |
| | Coordinated | | Cost of Service | |
| | | (electric rate increase) | Report, | |
| | | | Additional | |
| | | | Amortizations | |
| | | | Rebuttal- | |
| | | | allocations | |
| | | | Surrebuttal- | |
| | | | allocations | |
| | | | True-up Direct | |
| | | | True-up Rebuttal | |
| 2010 | ER-2010-0356 Coordinated | KCP&L Greater Missouri Operations Company (electric rate increase) (electric rate increase) | Direct- sponsor Utility Services Cost of Service Report Rebuttal- capacity planning Surrebuttal- capacity planning and Hawthorn 5 costs True-up Direct True-up Rebuttal | Contested |
| 2011 | WO-2011-0328 | Algonquin Water Resources of Missouri dba Liberty Water | Recommendation Memorandum | Pending |
| | Coordinated | Company acquisition of Noel Water Company | | |
| | | (water sale case) | | |

CASES SUPERVISED AND ASSISTED:

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony | <u>Case</u> <u>Disposition</u> |
|-------------|----------------------------|---|------------------------------|-----------------------------------|
| 1986 | TR-86-14 | ALLTEL Missouri, Inc. (telephone rate increase) | | Stipulated |
| | Coordinated | , | | |
| 1986 | TR-86-55 | Continental Telephone Company of Missouri | | Stipulated |
| | Coordinated | (telephone rate increase) | | |
| 1986 | TR-86-63 | Webster County Telephone Company | | Stipulated |
| | Coordinated | (telephone rate increase) | | |
| 1986 | GR-86-76 | KPL-Gas Service Company (natural gas rate increase) | | Withdrawn |
| | Coordinated | () | | |
| 1986 | TR-86-117 | United Telephone Company of Missouri | Withdrawn prior to filing | Withdrawn |
| | Coordinated | (telephone rate increase) | to ming | |
| 1988 | GR-88-115 | St. Joseph Light & Power Company | Deposition | Stipulated |
| | Coordinated | (natural gas rate increase) | | |
| 1988 | HR-88-116 | St. Joseph Light & Power Company (industrial steam rate increase) | Deposition | Stipulated |
| 1994 | ER-94-194 | Empire District Electric Company (electric rate increase) | | |
| 2003 | QW-2003-016 QS-2003-015 | Tandy County (water & sewer informal rate increase) | Recommendation Memorandum | Stipulated |
| 2004 | HM-2004-0618 | Trigen- Kansas City Energy purchase by Thermal North | | Stipulated |
| | Coordinated | America (steam - sale of assets) | | |

| <u>Year</u> | Case No. | <u>Utility</u> | Type of Testimony | <u>Case</u> <u>Disposition</u> |
|-------------|------------------------------|--|---|-----------------------------------|
| 2005 | GM-2005-0136 Coordinated | Partnership interest of DTE Enterprises, Inc. and DTE Ozark, Inc in Southern Gas Company purchase by Sendero SMGC LP (natural gas sale of assets) | Recommendation Memorandum | Stipulated |
| 2005 | WO-2005-0206 Coordinated | Silverleaf sale to Algonquin (water & sewer- sale of assets) | | Stipulated |
| 2006 | WR-2006-0250 | Hickory Hills (water & sewer- informal rate increase) | Recommendation Memorandum | Contested |
| 2006 | HA-2006-0294 Coordinated | Trigen Kansas City Energy (steam- expansion of service area) | Recommendation Memorandum & Testimony | Contested |
| 2007 | SR-2008-0080 QS-2007-0008 | Timber Creek (sewer- informal rate increase) | Recommendation Memorandum | Stipulated |
| 2008 | QW-2008-0003 | Spokane Highlands Water Company (water- informal rate increase) | Recommendation Memorandum | Stipulated |
| 2009 | WR-2010-0139 SR-2010-0140 | Valley Woods Water Company | Recommendation Memorandum | Stipulated |
| 2009 | EO-2010-0060 | KCPL Greater Missouri Operations Blue Springs service center sale | Recommendation Memorandum | Withdrawn |
| 2010 | EO-2010-0211 | KCPL Greater Missouri Operations Liberty service center sale | Recommendation Memorandum | Stipulated |
| 2010 | WR-2010-0202 | Stockton Water Company | Recommendation Memorandum | Stipulated |
| 2010 | SA-2010-0219 | Canyon Treatment Company Certificate of Convenience and Necessity Case | Recommendation Memorandum | Pending |
| 2010 | SR-2010-0320 | Timber Creek Sewer Company | Coordinated Case | Contested |

Educational and Employment Background and Credentials of Sean M. Furey

I am currently employed as a Utility Regulatory Auditor I for the Missouri Public Service Commission (Commission). I was employed by the Commission in October 2010. I earned a Bachelor of Science degree in Business Administration in May 2010.

As a Utility Regulatory Auditor I, I perform rate audits and prepare miscellaneous filings as ordered by the Commission. In addition, I review all exhibits and testimony on assigned issues, develop accounting adjustments and issue positions which are supported by workpapers and written testimony. For cases that do not require prepared testimony, I prepare Staff Recommendation Memorandums.

Cases I have been assigned are shown in the following table:

| Case/Tracking Number | Company Name - Issue | |
|----------------------|--|--|
| HR-2011-0241 | Veolia Energy Kansas City | |
| GO-2011-0269 | Missouri Gas Energy - Infrastructure Service Replacement Surcharge (ISRS). | |

Educational and Employment Background and Credentials of Patricia A. Gaskins

I am currently employed as a Utility Regulatory Auditor I for the Missouri Public Service Commission (Commission). I was employed by the Commission in October 2010. Previously, I was employed by the Missouri Department of Social Services as an auditor. In that capacity I was responsible for auditing the cost reports of Missouri Hospitals for an accurate dispersment of State and Federal Medicaid dollars, preparing monthly reports detailing the issuance of those dollars, and reconciling the Medicaid fund after each month's dispersment. I earned a Bachelor of Science degree in Business Administration with majors in Accounting, Finance, and Management from Columbia College.

As a Utility Regulatory Auditor I, I perform rate audits and prepare miscellaneous filings as ordered by the Commission. In addition, I review all exhibits and testimony on assigned issues, develop accounting adjustments and issue positions which are supported by workpapers and written testimony. For cases that do not require prepared testimony, I prepare Staff Recommendation Memorandums.

Cases I have been assigned are shown in the following table:

| Case/Tracking Number | Company Name - Issue | |
|----------------------|---------------------------|--|
| GO-2011-0269 | Missouri Gas Energy | |
| HR-2011-0241 | Veolia Energy Kansas City | |

Educational and Employment Background and Credentials of Karen K. Lyons

I am currently employed as a Utility Regulatory Auditor IV for the Missouri Public Service Commission (Commission). I was employed by the Commission in April 2007. Previously, I was employed by AT&T as a Regulatory Complaint Manager from December 1999 to February 2007. In that capacity I was responsible for addressing consumer and business complaints filed with various state and federal regulatory agencies. I earned a Bachelor of Science degree in Management Accounting and a Masters in Business Administration from Park University.

As a Utility Regulatory Auditor IV I perform rate audits and prepare miscellaneous filings as ordered by the Commission. In addition, I review all exhibits and testimony on assigned issues, develop accounting adjustments and issue positions which are supported by workpapers and written testimony. For cases that do not require prepared testimony, I prepare Staff Recommendation Memorandums.

Cases I have been assigned are shown in the following table:

| Case/Tracking Number | Company Name - Issue | |
|----------------------------------|--|--|
| QW-2008-0003 | Spokane Highlands Water Company | |
| GO-2008-0113 | Missouri Gas Energy - Infrastructure Service Replacement Surcharge (ISRS). | |
| ER-2008-0089 | Kansas City Power & Light | |
| ER-2008-0090 and HR-2008-0092 | KCP&L Greater Missouri Operations | |
| GR-2009-0355 | Missouri Gas Energy | |
| SR-2010-0110 and WR-2010-0111 | Lake Region Water and Sewer | |
| WR-2010-0139 and SR-2010-0140 | Valley Woods Water Company | |
| WR-2010-0202 | Stockton Water Company | |
| SA-2010-0219 | Canyon Treatment Facility | |
| ER-2010-0355 | Kansas City Power & Light | |
| ER-2010-0356 | KCP&L Greater Missouri Operations | |
| HR-2011-0241 | Veolia Energy Kansas City, Inc. | |

ZEPHANIA MAREVANGEPO

Educational and Employment Background and Credentials

I am currently employed as a Utility Regulatory Auditor II for the Missouri Public Service Commission (Commission). I accepted the position of Utility Regulatory Auditor I in December 2008.

I earned a Bachelor of Science degree in Business Administration with an emphasis in Accounting and Financial Services from Columbia College in July 2007. I earned a Masters in Business Administration with an emphasis in Accounting from Lincoln University in May 2009. My accounting and financial services degrees required an understanding of financial concepts, including the cost of capital.

On June 21, 2010, I was awarded the Certified Rate of Return Analyst (CRRA) professional designation by the Society of Utility and Regulatory Financial Analysts (SURFA). This designation is awarded based upon experience and successful completion of a written examination, which I completed during my attendance at a SURFA conference in April 2008.

I have developed rate of return recommendations for numerous small water and sewer rate cases and have assisted as needed in small water and sewer certificate cases.

SUMMARY OF CASE PARTICIPATION

| Date | e Filed | Issue | Case Number | Exhibit | Case Name |
|-------|---------|----------------|--------------|---------------------------|--|
| 11/08 | 8/2010 | Rate of Return | GR-2010-0363 | Cost of Service Report | Union Electric Company d/b/a AmerenUE |
| 07/20 | 0/2010 | Rate of Return | GR-2010-0171 | Surrebuttal | Laclede Gas Company |

| Date Filed | Issue | Case Number | Exhibit | Case Name |
|------------|------------------------------------|--------------|---------------------------|--------------------------|
| 06/24/2010 | Rate of Return | GR-2010-0171 | Rebuttal | Laclede Gas Company |
| 06/04/2010 | Rate of Return/ Cost of Capital | GR-2010-0192 | Cost of Service Report | Atmos Energy Corporation |
| 05/24/2010 | Rate of Return/ Cost of Capital | GR-2010-0171 | Cost of Service Report | Laclede Gas Company |
| 03/16/2010 | Finance Case | GR-2009-0450 | Rebuttal | Laclede Gas Company |
| 02/23/2010 | Finance Case | GR-2009-0450 | Direct | Laclede Gas Company |

Bret G. Prenger

Education and Employment Background and Credentials

I am currently employed as a Utility Regulatory Auditor III for the Missouri Public Service Commission (Commission). I began my employment with the Commission on June 2, 2008. I earned a Bachelor of Science in Accounting from Missouri State University, in Springfield, MO in May 2008. In earning this degree I completed numerous core Accounting and business classes. I look forward to earning my Masters in Business Administration in the near future.

As a Utility Regulatory Auditor, I perform rate audits and prepare miscellaneous filings as ordered by the Commission. In addition, I review all exhibits and testimony on my assigned issues, develop adjustments and issue positions which I then support by work papers and written testimony. For those cases that do not require prepared testimony, I prepare Staff Recommendation Memorandums.

Other cases I have been assigned to or participated are:

| Case Number | Company Name - Issue |
|--------------|---|
| HR-201-0241 | Veolia Energy Corporation (Veolia) |
| ER-2010-0356 | KCP&L-Greater Missouri Operations Company- (GMO) |
| ER-2010-0355 | Kansas City Power and Light Company-Electric |
| SR-2010-0320 | Timber Creek Sewer Company |
| WR-2010-0202 | Stockton Hills Water Company |
| WR-2010-0111 | Lake Region Water and Sewer Company (LRWS) |
| SR-2010-0110 | Lake Region Water and Sewer Company (LRWS) |
| GR-2009-0355 | Missouri Gas Energy (MGE), a Division of Southern Union (Electric) |
| HR-2009-0092 | KCP&L Greater Missouri Operations Company (GMO) - L&P (Steam) |

| Case Number | Company Name - Issue |
|--------------|---|
| ER-2009-0090 | KCP&L Greater Missouri Operations Company (GMO) - MPS and L&P (Electric) |
| ER-2009-0089 | Kansas City Power & Light Company – Direct Report- Material and Supplies, Prepayments, Advertising and Rate Case Expenses |
| GO-2009-0009 | Missouri Gas Energy (MGE) – Infrastructure Service Replacement Surcharge (ISRS) |
| SR-2008-0389 | West 16 th Sewer Company |
| SR-2008-0388 | WPC Sewer Company |

David Williams

Education and Employment Background and Credentials

Since July of 2008 I have been employed as a Utility Engineering Specialist for the Missouri Public Service Commission (Commission). From 2000 through 2008 I was employed by the Missouri Department of Economic Development Information Technology section, developing software and database applications. From 1967 until 2000 I was employed by the University of Missouri in engineering, research and information technology capacities.

I received a Master of Science degree in Industrial Engineering from the University of Missouri - Columbia in 1967, and undergraduate degrees in engineering and business management in 1965.

My current duties for the Commission include valuation analysis of utility assets, including depreciation studies.

I have worked on the cases indicated below.

| Company | Case Number |
|-----------------------------|--------------|
| Ameren Missouri | GR-2010-0363 |
| AmerenUE Decommissioning | EO-2006-0098 |
| Aqua Missouri (Development) | SC-2010-0150 |
| Aqua Missouri (Development) | SR-2010-0023 |
| Aqua Missouri, Inc. | SC-2010-0152 |
| Aqua Missouri, Inc. | WC-2010-0151 |
| Aqua Missouri, Inc. (CU) | SR-2010-0026 |
| Aqua Missouri, Inc. (CU) | WR-2010-0027 |
| Aqua Missouri, Inc. (RU) | WC-2010-0153 |
| Aqua Missouri, Inc. (RU) | WR-2010-0025 |
| AquaSource Development | SO-2011-0169 |

| Company | Case Number |
|-----------------------------|--------------|
| Braden Park Village | WA-2011-0260 |
| Citizens Telephone Company | IO-2009-0032 |
| Empire District Electric | ER-2010-0130 |
| Empire District Gas | GR-2009-0434 |
| Hickory Hills Water & Sewer | SR-2009-0154 |
| Hickory Hills Water & Sewer | WR-2009-0151 |
| House Springs Sewer | SR-2011-0274 |
| KCP&L Greater Missouri Op. | HR-2009-0092 |
| Laclede Gas | GR-2010-0171 |
| Lake Region Water & Sewer | SR-2010-0110 |
| Lake Region Water & Sewer | WR-2010-0111 |
| Mid-Missouri Telephone | IU-2010-0164 |
| Missouri Gas Energy | GE-2010-0030 |
| Missouri Gas Utility | GM-2011-0354 |
| Missouri Utilities | SR-2009-0153 |
| Missouri Utilities | WR-2009-0150 |
| Missouri-American | SO-2011-0214 |
| Missouri-American | WO-2011-0168 |
| Missouri-American | WO-2011-0213 |
| Missouri-American | WR-2011-0337 |
| Missouri-American | SR-2011-0338 |

| Company | Case Number | | | | |
|---------------------------------|--------------|--|--|--|--|
| Osage Water | SR-2009-0152 | | | | |
| Osage Water | WR-2009-0149 | | | | |
| Seges Partners Mobile Home Park | SR-2011-0133 | | | | |
| Southern Missouri Natural Gas | GM-2011-0354 | | | | |
| Suburban Water and Sewer | WR-2009-0197 | | | | |
| Swiss Villa Utilities | WO-2007-0410 | | | | |
| TBJ Sewer Systems | SR-2011-0182 | | | | |
| US Water Lexington | WM-2011-0030 | | | | |
| Veolia Energy Kansas City | HR-2011-0241 | | | | |
| Whiteside Hidden Acres | SA-2009-0262 | | | | |
| Whiteside Hidden Acres | WA-2009-0261 | | | | |
| Whiteside Hidden Acres | WR-2011-0024 | | | | |
| Woodland Acres | WA-2009-0031 | | | | |
| Working Group | SW-2011-0103 | | | | |

SEOUNG JOUN WON

Education and Employment Background and Credentials

I am currently employed as a Regulatory Economist III in the Economic Analysis Section, Energy Department, Utility Operation Division of the Missouri Public Service Commission (Commission). I have been employed at the Missouri Public Service Commission since May 2010.

I received my Bachelor of Arts, Master of Arts, and Doctor of Philosophy in Mathematics from Yonsei University in Seoul, South Korea, and earned my Doctor of Philosophy in Economics from the University of Missouri - Columbia. In addition, I passed several certificate examinations for Finance Specialist in South Korea such as Enterprise Resource Planning Consultant, Financial Risk Management, Derivatives Consultant, and Financial Planner.

Prior to joining the Commission, I taught both undergraduate and graduate level mathematics in the Korean Air Force Academy and Yonsei University for 13 years. I served as the director of the Education and Technology Research Center in NeoEdu for 5 years.

My duties in the Commission include managing weather data, calculating normal weather, and analyzing revenues and rate designs.

List of Previous Testimony Filed

| CASE NO. | COMPANY ISSUE |
|--------------|--|
| ER-2010-0355 | Kansas City Power & Light Company |
| ER-2010-0356 | KCP&L Greater Missouri Operations Company |
| GR-2010-0363 | Ameren Missouri Gas |
| ER-2011-0004 | Empire District Electric Company |
| ER-2011-0028 | Union Electric Company d/b/a Ameren Missouri |

MISSOURI PUBLIC SERVICE COMMISSION

STAFF REPORT COST OF SERVICE

APPENDIX 2

Support for Staff Cost of Capital Recommendations

VEOLIA ENERY KANSAS CITY, INC

CASE NO. HR-2011-0241

AN ANALYSIS OF THE COST OF CAPITAL

FOR

VEOLIA ENERGY KANSAS CITY, INC.

CASE NO. HR-2011-0241

SCHEDULES

\mathbf{BY}

ZEPHANIA MAREVANGEPO

UTILITY SERVICES DIVISION

MISSOURI PUBLIC SERVICE COMMISSION

AUGUST 2011

List of Schedules

| Schedule Number | Description of Schedule | | | | | | | | | |
|--------------------|--|--|--|--|--|--|--|--|--|--|
| 4 | List of Schedules | | | | | | | | | |
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| 2-1 | Federal Reserve Discount Rate Changes and Federal Reserve Funds Rate Changes | | | | | | | | | |
| 2-2 3-1 | Graph of Federal Reserve Discount Rates and Federal Funds Rates Rate of Inflation | | | | | | | | | |
| 3-1 | Graph of Rate of Inflation | | | | | | | | | |
| 4-1 | · | | | | | | | | | |
| 4-2 | Average Yields on AA, A and BBB Public Utility Bonds Average Yields on Thirty-Year U.S. Treasury Bonds | | | | | | | | | |
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| 6 | Seven Comparable Natural Gas Distribution Companies | | | | | | | | | |
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| 7 | Capital Structures of Proxy Group for | | | | | | | | | |
| , | 2010 Fiscal Year | | | | | | | | | |
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| 0.1 | for Fiscal Year Ended December 31, 2010 | | | | | | | | | |
| 8-2 | Atmos Energy Corporation Stated Cost of Long-Term Debt | | | | | | | | | |
| 0 = | for Fiscal Year Ended September 30, 2010 | | | | | | | | | |
| 8-3 | NJR Corporation Stated Cost of Long-Term Debt | | | | | | | | | |
| | for Fiscal Year Ended September 30, 2010 | | | | | | | | | |
| 8-4 | Northwest Natural Gas Company Stated Cost of Long-Term Debt | | | | | | | | | |
| | for Fiscal Year Ended December 31, 2010 | | | | | | | | | |
| 8-5 | Piedmont Natural Gas Company, Inc. Stated Cost of Long-Term Debt | | | | | | | | | |
| | for Fiscal Year Ended October 31, 2010 | | | | | | | | | |
| 8-6 | South Jersey Industries Stated Cost of Long-Term Debt | | | | | | | | | |
| | for Fiscal Year Ended December 31, 2010 | | | | | | | | | |
| 8-7 | WGL Holdings, Inc. Stated Cost of Long-Term Debt | | | | | | | | | |
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| 9 | Stated Cost of Long-Term Debt for the Natural Gas Proxy Group | | | | | | | | | |
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| 10-2 | Five-Year Dividends Per Share, Earnings Per Share & Book Value Per Share Growth Rates | | | | | | | | | |
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| 10-4 | Historical and Projected Growth Rates for the Seven Comparable Natural Gas Distribution Companies | | | | | | | | | |
| 11-1 | Average High / Low Stock Price for April through June 2011 | | | | | | | | | |
| | for the Seven Comparable Natural Gas Distribution Companies | | | | | | | | | |
| 11-2 | Discounted Cash Flow (DCF) Estimated Costs of Common Equity | | | | | | | | | |
| | for the Seven Comparable Natural Gas Distribution Companies | | | | | | | | | |
| 12 | Capital Asset Pricing Model (CAPM) Costs of Common Equity Estimates | | | | | | | | | |
| | Based on Historical Return Differences Between Common Stocks and Long-Term U.S. Treasuries | | | | | | | | | |
| | for the Seven Comparable Natural Gas Distribution Companies | | | | | | | | | |
| 13 | Weighted Cost of Capital | | | | | | | | | |
| | for Veolia Energy Kansas City, Inc. | | | | | | | | | |

Federal Reserve Discount Rate Changes and Federal Reserve Funds Rate Changes

| Date | Federal Reserve Discount Rate | Federal Reserve Funds Rate | Date | Federal Reserve Discount Rate | Federal Reserve Funds Rate |
|----------|----------------------------------|-------------------------------|----------|----------------------------------|-------------------------------|
| 01/01/83 | 8.50% | | 06/30/99 | 4.50% | 5.00% |
| 12/31/83 | 8.50% | | 08/24/99 | 4.75% | 5.25% |
| 04/09/84 | 9.00% | | 11/16/99 | 5.00% | 5.50% |
| 11/21/84 | 8.50% | | 02/02/00 | 5.25% | 5.75% |
| 12/24/84 | 8.00% | | 03/21/00 | 5.50% | 6.00% |
| 05/20/85 | 7.50% | | 05/19/00 | 6.00% | 6.50% |
| 03/07/86 | 7.00% | | 03/19/00 | 5.75% | 6.00% |
| 04/21/86 | 6.50% | | 01/03/01 | 5.50% | 6.00% |
| 04/21/86 | | | | | |
| | 6.00% | | 01/31/01 | 5.00% | 5.50% |
| 08/21/86 | 5.50% | | 03/20/01 | 4.50% | 5.00% |
| 09/04/87 | 6.00% | | 04/18/01 | 4.00% | 4.50% |
| 08/09/88 | 6.50% | | 05/15/01 | 3.50% | 4.00% |
| 02/24/89 | 7.00% | | 06/27/01 | 3.25% | 3.75% |
| 07/13/90 | | 8.00% | 08/21/01 | 3.00% | 3.50% |
| 10/29/90 | | 7.75% | 09/17/01 | 2.50% | 3.00% |
| 11/13/90 | | 7.50% | 10/02/01 | 2.00% | 2.50% |
| 12/07/90 | | 7.25% | 11/06/01 | 1.50% | 2.00% |
| 12/18/90 | | 7.00% | 12/11/01 | 1.25% | 1.75% |
| 12/19/90 | 6.50% | | 11/06/02 | 0.75% | 1.25% |
| 01/09/91 | | 6.75% | 01/09/03 | 2.25% | ** 1.25% |
| 02/01/91 | 6.00% | 6.25% | 06/25/03 | 2.00% | 1.00% |
| 03/08/91 | | 6.00% | 06/30/04 | 2.25% | 1.25% |
| 04/30/91 | 5.50% | 5.75% | 08/10/04 | 2.50% | 1.50% |
| 08/06/91 | | 5.50% | 09/21/04 | 2.75% | 1.75% |
| 09/13/91 | 5.00% | 5.25% | 11/10/04 | 3.00% | 2.00% |
| 10/31/91 | 0.0070 | 5.00% | 12/14/04 | 3.25% | 2.25% |
| 11/06/91 | 4.50% | 4.75% | 02/02/05 | 3.50% | 2.50% |
| 12/06/91 | 4.0070 | 4.50% | 03/22/05 | 3.75% | 2.75% |
| 12/20/91 | 3.50% | 4.00% | 05/03/05 | 4.00% | 3.00% |
| 04/09/92 | 3.50 /6 | 3.75% | 06/30/05 | 4.25% | 3.25% |
| 07/02/92 | 3.00% | | 08/09/05 | | 3.50% |
| | 3.00 /6 | 3.25% | | 4.50% | |
| 09/04/92 | | 3.00% | 09/20/05 | 4.75% | 3.75% |
| 01/01/93 | No Channe | No Channe | 11/01/05 | 5.00% | 4.00% |
| 12/31/93 | No Changes | No Changes | 12/13/05 | 5.25% | 4.25% |
| 02/04/94 | | 3.25% | 01/31/06 | 5.50% | 4.50% |
| 03/22/94 | | 3.50% | 03/28/06 | 5.75% | 4.75% |
| 04/18/94 | 0.500/ | 3.75% | 05/10/06 | 6.00% | 5.00% |
| 05/17/94 | 3.50% | 4.25% | 06/29/06 | 6.25% | 5.25% |
| 08/16/94 | 4.00% | 4.75% | 08/17/07 | 5.75% | 5.25% |
| 11/15/94 | 4.75% | 5.50% | 09/18/07 | 5.25% | 4.75% |
| 02/01/95 | 5.25% | 6.00% | 10/31/07 | 5.00% | 4.50% |
| 07/06/95 | | 5.75% | 12/11/07 | 4.75% | 4.25% |
| 12/19/95 | | 5.50% | 01/22/08 | 4.00% | 3.50% |
| 01/31/96 | 5.00% | 5.25% | 01/30/08 | 3.50% | 3.00% |
| 03/25/97 | | 5.50% | 03/16/08 | 3.25% | |
| 12/12/97 | 5.00% | | 03/18/08 | 2.50% | 2.25% |
| 01/09/98 | 5.00% | | 04/30/08 | 2.25% | 2.00% |
| 03/06/98 | 5.00% | | 10/08/08 | 1.75% | 1.50% |
| 09/29/98 | | 5.25% | 10/28/08 | 1.25% | 1.00% |
| 10/15/98 | 4.75% | 5.00% | 12/30/08 | 0.50% | 0%25% |
| 11/17/98 | 4.50% | 4.75% | 02/19/10 | 0.75% | |

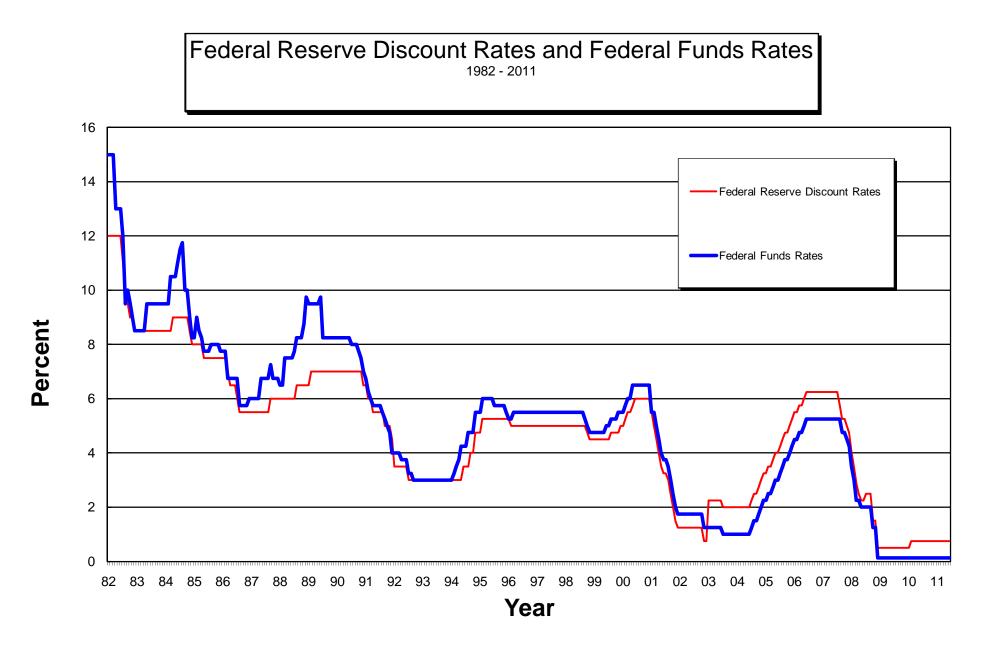
^{*} Staff began tracking the Federal Funds Rate.

Source:

Federal Reserve Discount rate Federal Reserve Funds rate $\underline{\text{http://www.newyorkfed.org/markets/statistics/dlyrates/fedrate.htm}}\\ \underline{\text{http://www.newyorkfed.org/markets/statistics/dlyrates/fedrate.html}}$

Note: Interest rates as of December 31 for each year are underlined.

^{**}Revised discount window program begins. Reflects rate on primary credit. This revised discount window policy results in incomparability of the discount rates after January 9, 2003 to discount rates before January 9, 2003.

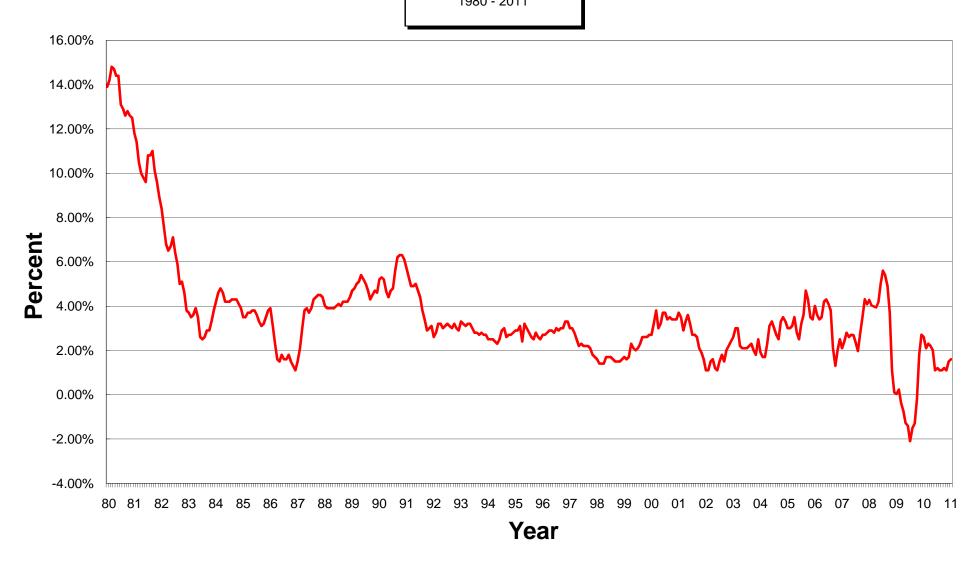


Rate of Inflation

| Mo/Year | Rate (%) |
|-----------------|--------------|-----------------|--------------|-----------------|--------------|-----------------|--------------|-----------------|--------------|-----------------|--------------|-----------------|--------------|-----------------|--------------|
| Jan 1980 | 13.90 | Jan 1984 | 4.20 | Jan 1988 | 4.00 | Jan 1992 | 2.60 | Jan 1996 | 2.70 | Jan 2000 | 2.70 | Jan 2004 | 1.90 | Jan 2008 | 4.30 |
| Feb | 14.20 | Feb | 4.60 | Feb | 3.90 | Feb | 2.80 | Feb | 2.70 | Feb | 3.20 | Feb | 1.70 | Feb | 4.00 |
| Mar | 14.80 | Mar | 4.80 | Mar | 3.90 | Mar | 3.20 | Mar | 2.80 | Mar | 3.70 | Mar | 1.70 | Mar | 4.00 |
| Apr | 14.70 | Apr | 4.60 | Apr | 3.90 | Apr | 3.20 | Apr | 2.90 | Apr | 3.00 | Apr | 2.30 | Apr | 3.90 |
| May | 14.40 | May | 4.20 | May | 3.90 | May | 3.00 | May | 2.90 | May | 3.20 | May | 3.10 | May | 4.20 |
| Jun | 14.40 | Jun | 4.20 | Jun | 4.00 | Jun | 3.10 | Jun | 2.80 | Jun | 3.70 | Jun | 3.30 | Jun | 5.00 |
| Jul | 13.10 | Jul | 4.20 | Jul | 4.10 | Jul | 3.20 | Jul | 3.00 | Jul | 3.70 | Jul | 3.00 | Jul | 5.60 |
| Aug | 12.90 | Aug | 4.30 | Aug | 4.00 | Aug | 3.10 | Aug | 2.90 | Aug | 3.40 | Aug | 2.70 | Aug | 5.40 |
| Sep | 12.60 | Sep | 4.30 | Sep | 4.20 | Sep | 3.00 | Sep | 3.00 | Sep | 3.50 | Sep | 2.50 | Sep | 4.90 |
| Oct | 12.80 | Oct | 4.30 | Oct | 4.20 | Oct | 3.20 | Oct | 3.00 | Oct | 3.40 | Oct | 3.30 | Oct | 3.70 |
| Nov | 12.60 | Nov | 4.10 | Nov | 4.20 | Nov | 3.00 | Nov | 3.30 | Nov | 3.40 | Nov | 3.50 | Nov | 1.10 |
| Dec | 12.50 | Dec | 3.90 | Dec | 4.40 | Dec | 2.90 | Dec | 3.30 | Dec | 3.40 | Dec | 3.30 | Dec | 0.10 |
| Jan 1981 | 11.80 | Jan 1985 | 3.50 | Jan 1989 | 4.70 | Jan 1993 | 3.30 | Jan 1997 | 3.00 | Jan 2001 | 3.70 | Jan 2005 | 3.00 | Jan 2009 | 0.00 |
| Feb | 11.40 | Feb | 3.50 | Feb | 4.80 | Feb | 3.20 | Feb | 3.00 | Feb | 3.50 | Feb | 3.00 | Feb | 0.20 |
| Mar | 10.50 | Mar | 3.70 | Mar | 5.00 | Mar | 3.10 | Mar | 2.80 | Mar | 2.90 | Mar | 3.10 | Mar | -0.40 |
| Apr | 10.00 | Apr | 3.70 | Apr | 5.10 | Apr | 3.20 | Apr | 2.50 | Apr | 3.30 | Apr | 3.50 | Apr | -0.70 |
| May | 9.80 | May | 3.80 | May | 5.40 | May | 3.20 | May | 2.20 | May | 3.60 | May | 2.80 | May | -1.28 |
| Jun | 9.60 | Jun | 3.80 | Jun | 5.20 | Jun | 3.00 | Jun | 2.30 | Jun | 3.20 | Jun | 2.50 | Jun | -1.40 |
| Jul | 10.80 | Jul | 3.60 | Jul | 5.00 | Jul | 2.80 | Jul | 2.20 | Jul | 2.70 | Jul | 3.20 | Jul | -2.10 |
| Aug | 10.80 | Aug | 3.30 | Aug | 4.70 | Aug | 2.80 | Aug | 2.20 | Aug | 2.70 | Aug | 3.60 | Aug | -1.50 |
| Sep | 11.00 | Sep | 3.10 | Sep | 4.30 | Sep | 2.70 | Sep | 2.20 | Sep | 2.60 | Sep | 4.70 | Sep | -1.30 |
| Oct | 10.10 | Oct | 3.20 | Oct | 4.50 | Oct | 2.80 | Oct | 2.10 | Oct | 2.10 | Oct | 4.30 | Oct | -0.20 |
| Nov | 9.60 | Nov | 3.50 | Nov | 4.70 | Nov | 2.70 | Nov | 1.80 | Nov | 1.90 | Nov | 3.50 | Nov | 1.80 |
| Dec | 8.90 | Dec | 3.80 | Dec | 4.60 | Dec | 2.70 | Dec | 1.70 | Dec | 1.60 | Dec | 3.40 | Dec | 2.70 |
| Jan 1982 | 8.40 | Jan 1986 | 3.90 | Jan 1990 | 5.20 | Jan 1994 | 2.50 | Jan 1998 | 1.60 | Jan 2002 | 1.10 | Jan 2006 | 4.00 | Jan 2010 | 2.60 |
| Feb | 7.60 | Feb | 3.10 | Feb | 5.30 | Feb | 2.50 | Feb | 1.40 | Feb | 1.10 | Feb | 3.60 | Feb | 2.10 |
| Mar | 6.80 | Mar | 2.30 | Mar | 5.20 | Mar | 2.50 | Mar | 1.40 | Mar | 1.50 | Mar | 3.40 | Mar | 2.30 |
| Apr | 6.50 | Apr | 1.60 | Apr | 4.70 | Apr | 2.40 | Apr | 1.40 | Apr | 1.60 | Apr | 3.50 | April | 2.20 |
| May | 6.70 | May | 1.50 | May | 4.40 | May | 2.30 | May | 1.70 | May | 1.20 | May | 4.20 | May | 2.00 |
| Jun | 7.10 | Jun | 1.80 | Jun | 4.70 | Jun | 2.50 | Jun | 1.70 | Jun | 1.10 | June | 4.30 | Jun | 1.10 |
| Jul | 6.40 | Jul | 1.60 | Jul | 4.80 | Jul | 2.90 | Jul | 1.70 | Jul | 1.50 | July | 4.10 | Jul | 1.20 |
| Aug | 5.90 | Aug | 1.60 | Aug | 5.60 | Aug | 3.00 | Aug | 1.60 | Aug | 1.80 | Aug | 3.80 | Aug | 1.10 |
| Sep | 5.00 | Sep | 1.80 | Sep | 6.20 | Sep | 2.60 | Sep | 1.50 | Sep | 1.50 | Sep | 2.10 | Sep | 1.10 |
| Oct | 5.10 | Oct | 1.50 | Oct | 6.30 | Oct | 2.70 | Oct | 1.50 | Oct | 2.00 | Oct | 1.30 | Oct | 1.20 |
| Nov | 4.60 | Nov | 1.30 | Nov | 6.30 | Nov | 2.70 | Nov | 1.50 | Nov | 2.20 | Nov | 2.00 | Nov | 1.10 |
| Dec | 3.80 | Dec | 1.10 | Dec | 6.10 | Dec | 2.80 | Dec | 1.60 | Dec | 2.40 2.60 | Dec | 2.50 2.10 | Dec | 1.50 |
| Jan 1983 Feb | 3.70 3.50 | Jan 1987 Feb | 1.50 2.10 | Jan 1991 Feb | 5.70 5.30 | Jan 1995 Feb | 2.90 2.90 | Jan 1999 Feb | 1.70 1.60 | Jan 2003 Feb | 3.00 | Jan 2007 Feb | 2.10 | Jan 2011 Feb | 1.60 2.10 |
| Mar | 3.60 | Mar | 3.00 | Mar | 4.90 | Mar | 3.10 | Mar | 1.70 | Mar | 3.00 | Mar | 2.40 | Mar | 2.70 |
| Apr | 3.90 | Apr | 3.80 | Apr | 4.90 | Apr | 2.40 | Apr | 2.30 | Apr | 2.20 | Apr | 2.60 | Apr | 3.20 |
| May | 3.50 | May | 3.90 | May | 5.00 | May | 3.20 | May | 2.10 | May | 2.20 | May | 2.70 | May | 3.60 |
| Jun | 2.60 | Jun | 3.70 | Jun | 4.70 | Jun | 3.00 | Jun | 2.00 | Jun | 2.10 | Jun | 2.70 | iviay | 3.00 |
| Jul | 2.50 | Jul | 3.90 | Jul | 4.40 | Jul | 2.80 | Jul | 2.10 | Jul | 2.10 | Jul | 2.40 | | |
| Aug | 2.60 | Aug | 4.30 | Aug | 3.80 | Aug | 2.60 | Aug | 2.30 | Aug | 2.20 | Aug | 2.00 | | |
| Sep | 2.90 | Sep | 4.40 | Sep | 3.40 | Sep | 2.50 | Sep | 2.60 | Sep | 2.30 | Sep | 2.80 | | |
| Oct | 2.90 | Oct | 4.50 | Oct | 2.90 | Oct | 2.80 | Oct | 2.60 | Oct | 2.00 | Oct | 3.50 | | |
| Nov | 3.30 | Nov | 4.50 | Nov | 3.00 | Nov | 2.60 | Nov | 2.60 | Nov | 1.80 | Nov | 4.30 | | |
| Dec | 3.80 | Dec | 4.40 | Dec | 3.10 | Dec | 2.50 | Dec | 2.70 | Dec | 1.90 | Dec | 4.10 | | |
| | | | | | | | | | | | | | | | |

Source: U.S. Dept of Labor, Bureau of Labor Statistics, Consumer Price Index - All Urban Consumers, Change for 12-Month Period, Bureau of Labor Statistics http://www.bls.gov/schedule/archives/cpi_nr.htm

Rate of Inflation



Average Yields on AA, A and BBB Public Utility Bonds

| Mo/Year Jan 1980 | Rate (%) | Mo/Year Jan 1984 | Rate (%) | Mo/Year Jan 1988 | Rate (%) | Mo/Year Jan 1992 | Rate (%) 8.67 | Mo/Year Jan 1996 | Rate (%) 7.20 | Mo/Year Jan 2000 | Rate (%) 8.22 | Mo/Year Jan 2004 | Rate (%) 6.23 | Mo/Year Jan 2008 | Rate (%) 6.08 |
|---------------------|----------|---------------------|----------|---------------------|----------|---------------------|------------------|---------------------|------------------|---------------------|------------------|---------------------|------------------|---------------------|------------------|
| Feb | 13.48 | Feb | 13.40 | Feb | 10.73 | Feb | 8.77 | Feb | 7.20 | Feb | 8.10 | Feb | 6.17 | Feb | 6.28 |
| Mar | 14.33 | Mar | 14.03 | Mar | 10.11 | Mar | 8.84 | Mar | 7.72 | Mar | 8.14 | Mar | 6.01 | Mar | 6.29 |
| Apr | 13.50 | Apr | 14.30 | Apr | 10.53 | Apr | 8.79 | Apr | 7.88 | Apr | 8.14 | Apr | 6.38 | Apr | 6.36 |
| May | 12.17 | May | 14.95 | May | 10.75 | May | 8.72 | May | 7.99 | May | 8.55 | May | 6.68 | May | 6.38 |
| Jun | 11.87 | Jun | 15.16 | Jun | 10.71 | Jun | 8.64 | Jun | 8.07 | Jun | 8.22 | Jun | 6.53 | Jun | 6.50 |
| Jul | 12.12 | Jul | 14.92 | Jul | 10.96 | Jul | 8.46 | Jul | 8.02 | Jul | 8.17 | Jul | 6.34 | Jul | 6.50 |
| Aug | 12.82 | Aug | 14.29 | Aug | 11.09 | Aug | 8.34 | Aug | 7.84 | Aug | 8.05 | Aug | 6.18 | Aug | 6.48 |
| Sep | 13.29 | Sep | 14.04 | Sep | 10.56 | Sep | 8.32 | Sep | 8.01 | Sep | 8.16 | Sep | 6.01 | Sep | 6.59 |
| Oct | 13.53 | Oct | 13.68 | Oct | 9.92 | Oct | 8.44 | Oct | 7.76 | Oct | 8.08 | Oct | 5.95 | Oct | 7.70 |
| Nov | 14.07 | Nov | 13.15 | Nov | 9.89 | Nov | 8.53 | Nov | 7.48 | Nov | 8.03 | Nov | 5.97 | Nov | 7.80 |
| Dec | 14.48 | Dec | 12.96 | Dec | 10.02 | Dec | 8.36 | Dec | 7.58 | Dec | 7.79 | Dec | 5.93 | Dec | 6.87 |
| Jan 1981 | 14.22 | Jan 1985 | 12.88 | Jan 1989 | 10.02 | Jan 1993 | 8.23 | Jan 1997 | 7.79 | Jan 2001 | 7.76 | Jan 2005 | 5.80 | Jan 2009 | 6.77 |
| Feb | 14.84 | Feb | 13.00 | Feb | 10.02 | Feb | 8.00 | Feb | 7.68 | Feb | 7.69 | Feb | 5.64 | Feb | 6.72 |
| Mar | 14.86 | Mar | 13.66 | Mar | 10.16 | Mar | 7.85 | Mar | 7.92 | Mar | 7.59 | Mar | 5.86 | Mar | 6.85 |
| Apr | 15.32 | Apr | 13.42 | Apr | 10.14 | Apr | 7.76 | Apr | 8.08 | Apr | 7.81 | Apr | 5.72 | Apr | 6.90 |
| May | 15.84 | May | 12.89 | May | 9.92 | May | 7.78 | May | 7.94 | May | 7.88 | May | 5.60 | May | 6.83 |
| Jun | 15.27 | Jun | 11.91 | Jun | 9.49 | Jun | 7.68 | Jun | 7.77 | Jun | 7.75 | Jun | 5.39 | June | 6.54 |
| Jul | 15.87 | Jul | 11.88 | Jul | 9.34 | Jul | 7.53 | Jul | 7.52 | Jul | 7.71 | Jul | 5.50 | July | 6.15 |
| Aug | 16.33 | Aug | 11.93 | Aug | 9.37 | Aug | 7.21 | Aug | 7.57 | Aug | 7.57 | Aug | 5.51 | Aug | 5.80 |
| Sep | 16.89 | Sep | 11.95 | Sep | 9.43 | Sep | 7.01 | Sep | 7.50 | Sep | 7.73 | Sep | 5.54 | Sep | 5.60 |
| Oct | 16.76 | Oct | 11.84 | Oct | 9.37 | Oct | 6.99 | Oct | 7.37 | Oct | 7.64 | Oct | 5.79 | Oct | 5.64 |
| Nov | 15.50 | Nov | 11.33 | Nov | 9.33 | Nov | 7.30 | Nov | 7.24 | Nov | 7.61 | Nov | 5.88 | Nov | 5.71 |
| Dec | 15.77 | Dec | 10.82 | Dec | 9.31 | Dec | 7.33 | Dec | 7.16 | Dec | 7.86 | Dec | 5.83 | Dec | 5.86 |
| Jan 1982 | 16.73 | Jan 1986 | 10.66 | Jan 1990 | 9.44 | Jan 1994 | 7.31 | Jan 1998 | 7.03 | Jan 2002 | 7.69 | Jan 2006 | 5.77 | Jan 2010 | 5.83 |
| Feb | 16.72 | Feb | 10.16 | Feb | 9.66 | Feb | 7.44 | Feb | 7.09 | Feb | 7.62 | Feb | 5.83 | Feb | 5.94 |
| Mar | 16.07 | Mar | 9.33 | Mar | 9.75 | Mar | 7.83 | Mar | 7.13 | Mar | 7.83 | Mar | 5.98 | Mar | 5.90 |
| Apr | 15.82 | Apr | 9.02 | Apr | 9.87 | Apr | 8.20 | Apr | 7.12 | Apr | 7.74 | Apr | 6.28 | Apr | 5.87 |
| May | 15.60 | May | 9.52 | May | 9.89 | May | 8.32 | May | 7.11 | May | 7.76 | May | 6.39 | May | 5.59 |
| Jun | 16.18 | Jun | 9.51 | Jun | 9.69 | Jun | 8.31 | Jun | 6.99 | Jun | 7.67 | June | 6.39 | June | 5.62 |
| Jul | 16.04 | Jul | 9.19 | Jul | 9.66 | Jul | 8.47 | Jul | 6.99 | Jul | 7.54 | July | 6.37 | July | 5.41 |
| | 15.22 | | 9.15 | Aug | 9.84 | | 8.41 | Aug | 6.96 | | 7.34 | Aug | 6.20 | • | 5.10 |
| Aug | | Aug | | ŭ | | Aug | | ŭ | | Aug | | • | 6.03 | Aug | |
| Sep | 14.56 | Sep | 9.42 | Sep | 10.01 | Sep | 8.65 | Sep | 6.88 | Sep | 7.23 | Sep | | Sep | 5.10 |
| Oct | 13.88 | Oct | 9.39 | Oct | 9.94 | Oct | 8.88 | Oct | 6.88 | Oct | 7.43 | Oct | 6.01 | Oct | 5.20 |
| Nov | 13.58 | Nov | 9.15 | Nov | 9.76 | Nov | 9.00 | Nov | 6.96 | Nov | 7.31 | Nov | 5.82 | Nov | 5.45 |
| Dec | 13.55 | Dec | 8.96 | Dec | 9.57 | Dec | 8.79 | Dec | 6.84 | Dec | 7.20 | Dec | 5.83 | Dec | 5.61 |
| Jan 1983 | 13.46 | Jan 1987 | 8.77 | Jan 1991 | 9.56 | Jan 1995 | 8.77 | Jan 1999 | 6.87 | Jan 2003 | 7.13 | Jan 2007 | 5.96 | Jan 2011 | 5.69 |
| Feb | 13.60 | Feb | 8.81 | Feb | 9.31 | Feb | 8.56 | Feb | 7.00 | Feb | 6.92 | Feb | 5.91 | Feb | 5.82 |
| Mar | 13.28 | Mar | 8.75 | Mar | 9.39 | Mar | 8.41 | Mar | 7.18 | Mar | 6.80 | Mar | 5.87 | Mar | 5.74 |
| Apr | 13.03 | Apr | 9.30 | Apr | 9.30 | Apr | 8.30 | Apr | 7.16 | Apr | 6.68 | Apr | 6.01 | Apr | 5.76 |
| May | 13.00 | May | 9.82 | May | 9.29 | May | 7.93 | May | 7.42 | May | 6.35 | May | 6.03 | May | 5.57 |
| Jun | 13.17 | Jun | 9.87 | Jun | 9.44 | Jun | 7.62 | Jun | 7.70 | Jun | 6.21 | June | 6.34 | June | 5.52 |
| Jul | 13.28 | Jul | 10.01 | Jul | 9.40 | Jul | 7.73 | Jul | 7.66 | Jul | 6.54 | July | 6.28 | | |
| Aug | 13.50 | Aug | 10.33 | Aug | 9.16 | Aug | 7.86 | Aug | 7.86 | Aug | 6.78 | Aug | 6.28 | | |
| Sep | 13.35 | Sep | 11.00 | Sep | 9.03 | Sep | 7.62 | Sep | 7.87 | Sep | 6.58 | Sep | 6.24 | | |
| Oct | 13.19 | Oct | 11.32 | Oct | 8.99 | Oct | 7.46 | Oct | 8.02 | Oct | 6.50 | Oct | 6.17 | | |
| Nov | 13.33 | Nov | 10.82 | Nov | 8.93 | Nov | 7.40 | Nov | 7.86 | Nov | 6.44 | Nov | 6.04 | | |
| Dec | 13.48 | Dec | 10.99 | Dec | 8.76 | Dec | 7.21 | Dec | 8.04 | Dec | 6.36 | Dec | 6.23 | | |
| | | | | | | | | | | | | | | | |

Source: Mergent Bond Record (through November 2010); BondsOnline (December 2010 to June 2011)

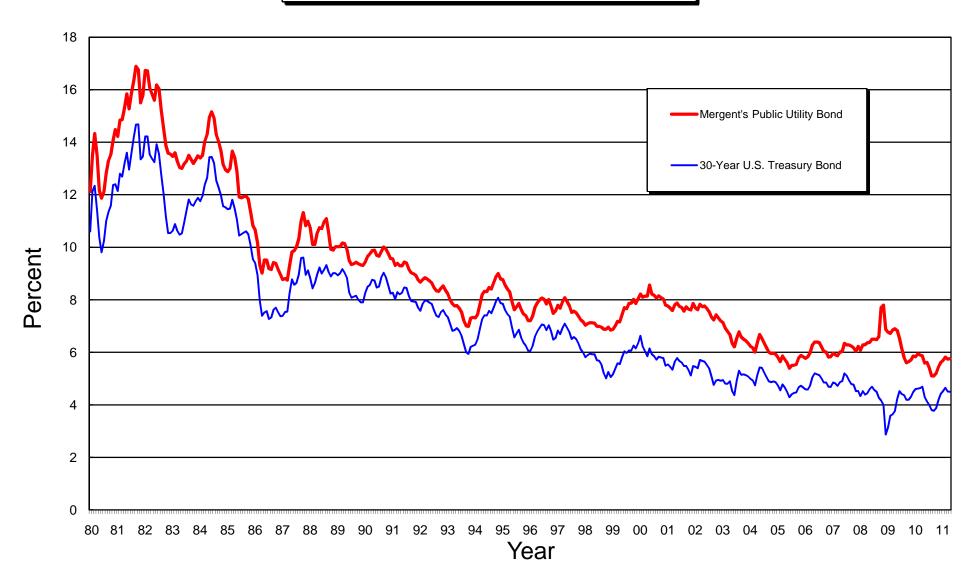
Average Yields on Thirty-Year U.S. Treasury Bonds

| Mo/Year Jan 1980 | Rate (%) 10.60 | Mo/Year Jan 1984 | Rate (%) 11.75 | Mo/Year Jan 1988 | Rate (%) 8.83 | Mo/Year Jan 1992 | Rate (%) 7.58 | Mo/Year Jan 1996 | Rate (%) 6.05 | Mo/Year Jan 2000 | Rate (%) 6.63 | Mo/Year Jan 2004 | Rate (%) 4.99 | Mo/Year Jan 2008 | Rate (%) 4.33 |
|---------------------|-------------------|---------------------|-------------------|---------------------|------------------|---------------------|------------------|---------------------|------------------|---------------------|------------------|---------------------|------------------|---------------------|------------------|
| Feb | 12.13 | Feb | 11.95 | Feb | 8.43 | Feb | 7.85 | Feb | 6.24 | Feb | 6.23 | Feb | 4.93 | Feb | 4.52 |
| Mar | 12.34 | Mar | 12.38 | Mar | 8.63 | Mar | 7.97 | Mar | 6.60 | Mar | 6.05 | Mar | 4.74 | Mar | 4.39 |
| Apr | 11.40 | Apr | 12.65 | Apr | 8.95 | Apr | 7.96 | Apr | 6.79 | Apr | 5.85 | Apr | 5.14 | Apr | 4.44 |
| May | 10.36 | May | 13.43 | May | 9.23 | May | 7.89 | May | 6.93 | May | 6.15 | May | 5.42 | May | 4.60 |
| Jun | 9.81 | Jun | 13.44 | Jun | 9.00 | Jun | 7.84 | Jun | 7.06 | Jun | 5.93 | Jun | 5.41 | Jun | 4.69 |
| Jul | 10.24 | Jul | 13.21 | Jul | 9.14 | Jul | 7.60 | Jul | 7.03 | Jul | 5.85 | Jul | 5.22 | Jul | 4.57 |
| Aug | 11.00 | Aug | 12.54 | Aug | 9.32 | Aug | 7.39 | Aug | 6.84 | Aug | 5.72 | Aug | 5.06 | Aug | 4.50 |
| Sep | 11.34 | Sep | 12.29 | Sep | 9.06 | Sep | 7.34 | Sep | 7.03 | Sep | 5.83 | Sep | 4.90 | Sep | 4.27 |
| Oct | 11.59 | Oct | 11.98 | Oct | 8.89 | Oct | 7.53 | Oct | 6.81 | Oct | 5.80 | Oct | 4.86 | Oct | 4.17 |
| Nov | 12.37 | Nov | 11.56 | Nov | 9.02 | Nov | 7.61 | Nov | 6.48 | Nov | 5.78 | Nov | 4.89 | Nov | 4.00 |
| Dec | 12.40 | Dec | 11.52 | Dec | 9.01 | Dec | 7.44 | Dec | 6.55 | Dec | 5.49 | Dec | 4.86 | Dec | 2.87 |
| Jan 1981 | 12.14 | Jan 1985 | 11.45 | Jan 1989 | 8.93 | Jan 1993 | 7.34 | Jan 1997 | 6.83 | Jan 2001 | 5.54 | Jan 2005 | 4.73 | Jan 2009 | 3.13 |
| Feb | 12.80 | Feb | 11.47 | Feb | 9.01 | Feb | 7.09 | Feb | 6.69 | Feb | 5.45 | Feb | 4.55 | Feb | 3.59 |
| Mar | 12.69 | Mar | 11.81 | Mar | 9.17 | Mar | 6.82 | Mar | 6.93 | Mar | 5.34 | Mar | 4.78 | Mar | 3.64 |
| Apr | 13.20 | Apr | 11.47 | Apr | 9.03 | Apr | 6.85 | Apr | 7.09 | Apr | 5.65 | Apr | 4.65 | Apr | 3.76 |
| May | 13.60 | May | 11.05 | May | 8.83 | May | 6.92 | May | 6.94 | May | 5.78 | May | 4.49 | May | 4.23 |
| Jun | 12.96 | Jun | 10.44 | Jun | 8.27 | Jun | 6.81 | Jun | 6.77 | Jun | 5.67 | Jun | 4.29 | Jun | 4.52 |
| Jul | 13.59 | Jul | 10.50 | Jul | 8.08 | Jul | 6.63 | Jul | 6.51 | Jul | 5.61 | Jul | 4.41 | July | 4.41 |
| Aug | 14.17 | Aug | 10.56 | Aug | 8.12 | Aug | 6.32 | Aug | 6.58 | Aug | 5.48 | Aug | 4.46 | Aug | 4.37 |
| Sep | 14.67 | Sep | 10.61 | Sep | 8.15 | Sep | 6.00 | Sep | 6.50 | Sep | 5.48 | Sep | 4.47 | Sep | 4.19 |
| Oct | 14.68 | Oct | 10.50 | Oct | 8.00 | Oct | 5.94 | Oct | 6.33 | Oct | 5.32 | Oct | 4.67 | Oct | 4.19 |
| Nov | 13.35 | Nov | 10.06 | Nov | 7.90 | Nov | 6.21 | Nov | 6.11 | Nov | 5.12 | Nov | 4.73 | Nov | 4.31 |
| Dec | 13.45 | Dec | 9.54 | Dec | 7.90 | Dec | 6.25 | Dec | 5.99 | Dec | 5.48 | Dec | 4.66 | Dec | 4.49 |
| Jan 1982 | 14.22 | Jan 1986 | 9.40 | Jan 1990 | 8.26 | Jan 1994 | 6.29 | Jan 1998 | 5.81 | Jan 2002 | 5.44 | Jan 2006 | 4.59 | Jan 2010 | 4.60 |
| Feb | 14.22 | Feb | 8.93 | Feb | 8.50 | Feb | 6.49 | Feb | 5.89 | Feb | 5.39 | Feb | 4.58 | Feb | 4.62 |
| Mar | 13.53 | Mar | 7.96 | Mar | 8.56 | Mar | 6.91 | Mar | 5.95 | Mar | 5.71 | Mar | 4.73 | Mar | 4.64 |
| Apr | 13.37 | Apr | 7.39 | Apr | 8.76 | Apr | 7.27 | Apr | 5.92 | Apr | 5.67 | Apr | 5.06 | Apr | 4.69 |
| May | 13.24 | May | 7.52 | May | 8.73 | May | 7.41 | May | 5.93 | May | 5.64 | May | 5.20 | May | 4.29 4.13 |
| Jun | 13.92 | Jun | 7.57 | Jun | 8.46 8.50 | Jun | 7.40 7.50 | Jun | 5.70 5.68 | Jun | 5.52 | Jun | 5.16 5.13 | Jun | |
| Jul | 13.55 12.77 | Jul | 7.27 7.33 | Jul | 8.86 | Jul | 7.58 7.49 | Jul | 5.56 5.54 | Jul | 5.38 5.08 | July | 5.13 | July | 3.99 3.80 |
| Aug | 12.77 | Aug Sep | 7.53 7.62 | Aug Sep | 9.03 | Aug Sep | 7.49 7.71 | Aug Sep | 5.20 | Aug Sep | 4.76 | Aug Sep | 4.85 | Aug Sep | 3.77 |
| Sep Oct | 11.17 | Oct | 7.70 | Oct | 8.86 | Oct | 7.71 | Oct | 5.01 | Oct | 4.70 | Oct | 4.85 | Oct | 3.87 |
| Nov | 10.54 | Nov | 7.52 | Nov | 8.54 | Nov | 8.08 | Nov | 5.25 | Nov | 4.95 | Nov | 4.69 | Nov | 4.19 |
| Dec | 10.54 | Dec | 7.37 | Dec | 8.24 | Dec | 7.87 | Dec | 5.06 | Dec | 4.92 | Dec | 4.68 | Dec | 4.42 |
| Jan 1983 | 10.63 | Jan 1987 | 7.39 | Jan 1991 | 8.27 | Jan 1995 | 7.85 | Jan 1999 | 5.16 | Jan 2003 | 4.94 | Jan 2007 | 4.85 | Jan 2011 | 4.52 |
| Feb | 10.88 | Feb | 7.54 | Feb | 8.03 | Feb | 7.61 | Feb | 5.37 | Feb | 4.81 | Feb | 4.82 | Feb | 4.65 |
| Mar | 10.63 | Mar | 7.55 | Mar | 8.29 | Mar | 7.45 | Mar | 5.58 | Mar | 4.80 | Mar | 4.72 | Mar | 4.51 |
| Apr | 10.48 | Apr | 8.25 | Apr | 8.21 | Apr | 7.36 | Apr | 5.55 | Apr | 4.90 | Apr | 4.86 | Apr | 4.50 |
| May | 10.53 | May | 8.78 | May | 8.27 | May | 6.95 | May | 5.81 | May | 4.53 | May | 4.90 | May | 4.29 |
| Jun | 10.93 | Jun | 8.57 | Jun | 8.47 | Jun | 6.57 | Jun | 6.04 | Jun | 4.37 | Jun | 5.20 | Jun | 4.23 |
| Jul | 11.40 | Jul | 8.64 | Jul | 8.45 | Jul | 6.72 | Jul | 5.98 | Jul | 4.93 | July | 5.11 | | |
| Aug | 11.82 | Aug | 8.97 | Aug | 8.14 | Aug | 6.86 | Aug | 6.07 | Aug | 5.30 | Aug | 4.93 | | |
| Sep | 11.63 | Sep | 9.59 | Sep | 7.95 | Sep | 6.55 | Sep | 6.07 | Sep | 5.14 | Sep | 4.79 | | |
| Oct | 11.58 | Oct | 9.61 | Oct | 7.93 | Oct | 6.37 | Oct | 6.26 | Oct | 5.16 | Oct | 4.77 | | |
| Nov | 11.75 | Nov | 8.95 | Nov | 7.92 | Nov | 6.26 | Nov | 6.15 | Nov | 5.13 | Nov | 4.52 | | |
| Dec | 11.88 | Dec | 9.12 | Dec | 7.70 | Dec | 6.06 | Dec | 6.35 | Dec | 5.08 | Dec | 4.53 | | |

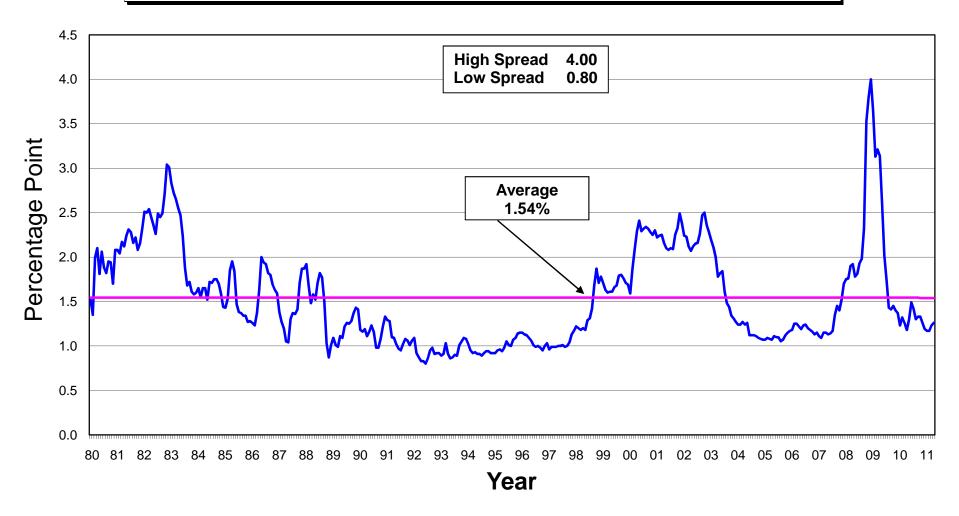
Sources:

http://finance.yahoo.com/q/hp?s=^TYX http://research.stlouisfed.org/fred2/data/GS30.txt

Average Yields on Mergent's Public Utility Bonds and Thirty-Year U.S. Treasury Bonds (1980 - 2011)



Monthly Spreads Between Yields on Mergent's Public Utility Bonds and Thirty-Year U.S. Treasury Bonds (1980 - 2011)



Criteria for Selecting Comparable Natural Gas Distribution Companies

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
|------------------------------------|----------|-------------|------------|------------|------------------|--------------|------------|
| | | | 10-Year | | | | |
| | | | Value Line | No Reduced | Projected Growth | At Least | Comparable |
| | Stock | Information | Historical | Dividend | Available from | Investment | Company |
| | Publicly | Printed In | Growth | Since | Value Line and | Grade Credit | Met All |
| Natural Gas Distribution Companies | Traded | Value Line | Available | 2008 | Reuters | Rating | Criteria |
| AGL Resources, Inc. | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Atmos Energy Corporation | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| DeltaNatural Gas Company, Inc. | Yes | Yes | Yes | Yes | No | | |
| Gas Natural Inc. | Yes | Yes | Yes | No | | | |
| Laclede Group | Yes | Yes | Yes | Yes | No | | |
| New Jersey Resources Corporation | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Northwest Natural Gas Company | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Piedmont Natural Gas Company, Inc. | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| RGC Resources, Inc. | Yes | Yes | Yes | Yes | No | | |
| South Jersey Industries, Inc. | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| WGL Holdings, Inc. | Yes | Yes | Yes | Yes | Yes | Yes | Yes |

Sources: Column 1 = Edward Jones' Natural Gas Industry Summary, June 30, 2011.

Columns 2, 3, 4 and 5 = The Value Line Investment Survey: Ratings & Reports, June 10, 2011.

Column 7 = Standard & Poor's Ratings Direct

Seven Comparable Natural Gas Distribution Companies for Veolia Energy Kansas City, Inc.

| | Ticker | | Bond |
|--------|---------|------------------------------------|--------|
| Number | Symbol | Company Name | Rating |
| 1 | ATG | AGL Resources, Inc. | BBB+ |
| 2 | ATO | Atmos Energy Corp. | BBB+ |
| 3 | NJR | New Jersey Resources Corporation | Α |
| 4 | NWN | Northwest Natural Gas | A+ |
| 5 | PNY | Piedmont Natural Gas Company, Inc. | Α |
| 6 | SJI | South Jersey Industries, Inc. | BBB+ |
| 7 | WGL | WGL Holdings, Inc. | AA- |
| | Average | <u>-</u> | Α |
| | | | |
| | | Veolia Environment | BBB+ |

Source: S&P Ratings Direct

Capital Structures of Proxy Group for 2010 Fiscal Year

| | | NJR | NW Natural | | South | WGL |
|--------------------------|---|--|---|---|--|---|
| AGL | Atmos | Corporation | Gas | Piedmont | Jersey | Holdings |
| \$1,836,000 | \$2,178,348 | \$725,483 | \$693,101 | \$964,941 | \$570,097 | \$1,153,395 |
| \$0 | \$0 | \$0 | \$0 | \$0 | \$0 | \$28,173 |
| \$1,973,000 ¹ | \$2,169,682 | \$428,015 ¹ | \$601,700 ¹ | \$731,922 ¹ | \$451,400 ¹ | \$622,973 ¹ |
| \$732,000 | \$126,100 | \$147,600 | \$257,435 | \$242,000 | \$250,687 | \$100,417 |
| \$4,541,000 | \$4,474,130 | \$1,301,098 | \$1,552,236 | \$1,938,863 | \$1,272,184 | \$1,904,958 |
| | \$1,836,000 \$0 \$1,973,000 ¹ \$732,000 | \$1,836,000 \$2,178,348 \$0 \$0 \$1,973,000 \$2,169,682 \$732,000 \$126,100 | AGL Atmos Corporation \$1,836,000 \$2,178,348 \$725,483 \$0 \$0 \$0 \$1,973,000 \$2,169,682 \$428,015 \$732,000 \$126,100 \$147,600 | AGL Atmos Corporation Gas \$1,836,000 \$2,178,348 \$725,483 \$693,101 \$0 \$0 \$0 \$0 \$1,973,000 \$2,169,682 \$428,015 \$601,700 \$601,700 \$732,000 \$126,100 \$147,600 \$257,435 | AGL Atmos Corporation Gas Piedmont \$1,836,000 \$2,178,348 \$725,483 \$693,101 \$964,941 \$0 \$0 \$0 \$0 \$1,973,000 1 \$2,169,682 \$428,015 1 \$601,700 1 \$731,922 1 \$732,000 \$126,100 \$147,600 \$257,435 \$242,000 | AGL Atmos Corporation Gas Piedmont Jersey \$1,836,000 \$2,178,348 \$725,483 \$693,101 \$964,941 \$570,097 \$0 \$0 \$0 \$0 \$0 \$1,973,000 1 \$2,169,682 \$428,015 1 \$601,700 1 \$731,922 1 \$451,400 1 \$732,000 \$126,100 \$147,600 \$257,435 \$242,000 \$250,687 |

| | | | NJR | NW Natural | | South | WGL | |
|-------------------|---------|---------|-------------|------------|----------|---------|----------|---------|
| Capital Structure | AGL | Atmos | Corporation | Gas | Piedmont | Jersey | Holdings | Average |
| Common Equity | 40.43% | 48.69% | 55.76% | 44.65% | 49.77% | 44.81% | 60.55% | 49.24% |
| Preferred Stock | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 1.48% | 0.21% |
| Long-Term Debt | 43.45% | 48.49% | 32.90% | 38.76% | 37.75% | 35.48% | 32.70% | 38.51% |
| Short-Term Debt | 16.12% | 2.82% | 11.34% | 16.58% | 12.48% | 19.71% | 5.27% | 12.05% |
| Total | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% | 100.00% |

Sources: 2010 Annual Reports and Form 10-K - SEC filings. Notes: 1 - Long-term debt including current maturities.

AGL Resources, Inc. Stated Cost of Long-Term Debt for Fiscal Year Ended December 31, 2010

| | Weighted Average | Amount | Outstanding |
|-------------------------------------|------------------|---|-------------|
| Long-Term Debt - Net of Current | Interest Rate | (In I | Millions) |
| Senior Notes | 5.50% | \$ | 1,275 |
| Gas Facility Revenue Bonds | 1.30% | \$ | 200 |
| Medium-term notes | 7.80% | \$ | 196 |
| Total | | <u> \$ </u> | 1,671 |
| | | | |
| Cost of Long-Term Debt ¹ | 5.27% | | |

Source: AGL Resources Form 10-K for 2010

Atmos Energy Corporation Stated Cost of Long-Term Debt for Fiscal Year Ended September 30, 2010

| Long-Term D | Ocht: | | Interest Rate | nt Outstanding Thousands) | Inter | est Expense |
|--------------|--------------|---------------------------------|---------------|---------------------------|-------|---------------------------------------|
| | | | | , | | · · · · · · · · · · · · · · · · · · · |
| Unsecured | 7.375% | Senior Notes, Due May 2011 | 7.375% | \$ 350,000 | \$ | 25,813 |
| Unsecured | 10.000% | Senior Notes, Due December 2011 | 10.000% | \$ 2,303 | \$ | 230 |
| Unsecured | 5.125% | Senior Notes, Due 2013 | 5.125% | \$ 250,000 | \$ | 12,813 |
| Unsecured | 4.950% | Senior Notes, Due 2014 | 4.950% | \$ 500,000 | \$ | 24,750 |
| Unsecured | 6.350% | Senior Notes, Due 2017 | 6.350% | \$ 250,000 | \$ | 15,875 |
| Unsecured | 8.500% | Senior Notes, Due 2019 | 8.500% | \$ 450,000 | \$ | 38,250 |
| Unsecured | 5.950% | Senior Notes, Due 2034 | 5.950% | \$ 200,000 | \$ | 11,900 |
| Medium Terr | n Notes: | | | | | |
| Series A 199 | 5-2, 6.27% | , Due 2010 | 6.27% | \$ 10,000 | \$ | 627 |
| Series A 199 | 5-1, 6.67% | , Due 2025 | 6.67% | \$ 10,000 | \$ | 667 |
| Unsecured 6 | .75% Debe | ntures, Due 2028 | 6.75% | \$ 150,000 | \$ | 10,125 |
| Less: | | | | | | |
| Origina | I Issue Disc | count | | \$ (3,014) | | |
| Total Amou | nt Outstan | ding | | \$ 2,169,289 | \$ | 141,049 |

Cost of Long-Term Debt1

6.50%

Source: Atmos Energy Corporation Form 10-K for September 30, 2010.

NJR Corporation Stated Cost of Long-Term Debt for Fiscal Year Ended September 30, 2010

| | | Amoun | t Outstanding | | |
|---------------------------------------|---------------|--------|---------------|--------|-------------|
| Long-Term Debt | Interest Rate | (In Th | nousands) | Intere | est Expense |
| First Mortgage Bonds: | | | | | |
| 6.88% Series CC, Due October 1, 2010 | 6.88% | \$ | 20,000 | \$ | 1,376 |
| 5.00% Series HH, Due December 1, 2038 | 5.00% | \$ | 12,000 | \$ | 600 |
| 4.50% Series II, Due August 1, 2023 | 4.50% | \$ | 10,300 | \$ | 464 |
| 4.60% Series JJ, Due August 1, 2024 | 4.60% | \$ | 10,500 | \$ | 483 |
| 4.90% Series KK, Due October 1, 2040 | 4.90% | \$ | 15,000 | \$ | 735 |
| 5.60% Series LL, Due May 15, 2018 | 5.60% | \$ | 125,000 | \$ | 7,000 |
| 4.77% Unsecured Senior Notes | 4.77% | \$ | 60,000 | \$ | 2,862 |
| 6.05% Unsecured Senior Notes | 6.05% | \$ | 50,000 | \$ | 3,025 |
| Total Amount Outstanding | | \$ | 302,800 | \$ | 16,545 |
| | | | | | _ |

Cost of Long-Term Debt¹

5.46%

Source: New Jersey Resources Corporation. Form 10-K for September 30

Northwest Natural Gas Company Stated Cost of Long-Term Debt for Fiscal Year Ended December 31, 2010

| Long-tern | n debt | Interest Rate | | t Outstanding ousands) | Interest Expense | | |
|-----------|--------------------|---------------|---------|------------------------|------------------|-------|--|
| | gage Bonds: | | , | , | | | |
| 6.665% | Series B, Due 2011 | 6.665% | \$ | 10,000 | \$ | 667 | |
| 7.130% | Series B, Due 2012 | 7.130% | \$ | 40,000 | \$ | 2,852 | |
| 8.260% | Series B, Due 2014 | 8.260% | \$ | 10,000 | \$ | 826 | |
| 3.950% | Series B, Due 2014 | 3.950% | \$ | 50,000 | \$ | 1,975 | |
| 4.700% | Series B, Due 2015 | 4.700% | \$ | 40,000 | \$ | 1,880 | |
| 5.150% | Series B, Due 2016 | 5.150% | \$ | 25,000 | \$ | 1,288 | |
| 7.000% | Series B, Due 2017 | 7.000% | \$ | 40,000 | \$ | 2,800 | |
| 6.600% | Series B, Due 2018 | 6.600% | \$ | 22,000 | \$ | 1,452 | |
| 8.310% | Series A, Due 2019 | 8.310% | \$ | 10,000 | \$ | 831 | |
| 7.630% | Series B, Due 2019 | 7.630% | \$ | 20,000 | \$ | 1,526 | |
| 5.370% | Series B, Due 2020 | 5.370% | \$ | 75,000 | \$ | 4,028 | |
| 9.050% | Series A, Due 2021 | 9.050% | \$ | 10,000 | \$ | 905 | |
| 5.620% | Series B, Due 2023 | 5.620% | \$ | 40,000 | \$ | 2,248 | |
| 7.720% | Series B, Due 2025 | 7.720% | \$ | 20,000 | \$ | 1,544 | |
| 6.520% | Series B, Due 2025 | 6.520% | \$ | 10,000 | \$ | 652 | |
| 7.050% | Series B, Due 2026 | 7.050% | \$ | 20,000 | \$ | 1,410 | |
| 7.000% | Series B, Due 2027 | 7.000% | \$ | 20,000 | \$ | 1,400 | |
| 6.650% | Series B, Due 2027 | 6.650% | \$ | 19,700 | \$ | 1,310 | |
| 6.650% | Series B, Due 2028 | 6.650% | \$ | 10,000 | \$ | 665 | |
| 7.740% | Series B, Due 2030 | 7.740% | \$ | 20,000 | \$ | 1,548 | |
| 7.850% | Series B, Due 2030 | 7.850% | \$ | 10,000 | \$ | 785 | |
| 5.820% | Series B, Due 2032 | 5.820% | \$ | 30,000 | \$ | 1,746 | |
| 5.660% | Series B, Due 2033 | 5.660% | \$ | 40,000 | \$ | 2,264 | |
| 5.250% | Series B, Due 2035 | 5.250% | \$ | 10,000 | \$ | 525 | |
| Total Am | ount Outstanding | \$ | 521,700 | \$ | 32,591 | | |

Cost of Long-Term Debt¹ 6.25%

Source: Northwest Natural Gas Company Form 10-K for December 31, 2010.

Piedmont Natural Gas Company, Inc. Stated Cost of Long-Term Debt for Fiscal Year Ended October 31, 2010

| | | | t Outstanding | | | |
|---------------------------------|----------------|---------------|----------------|---------|--------|------------|
| Long-Term | Debt | Interest Rate | (In Thousands) | | Intere | st Expense |
| Senior Note | es | | | | | |
| 8.510% | Due 2017 | 8.51% | \$ | 35,000 | \$ | 2,979 |
| Insured Qu | arterly Notes: | | | | | |
| 6.250% | Due 2036 | 6.25% | \$ | 196,922 | \$ | 12,308 |
| Medium-Te | erm Notes | | | | | |
| 6.550% | Due 2011 | 6.55% | \$ | 60,000 | \$ | 3,930 |
| 5.000% | Due 2013 | 5.00% | \$ | 100,000 | \$ | 5,000 |
| 6.870% | Due 2023 | 6.87% | \$ | 45,000 | \$ | 3,092 |
| 8.450% | Due 2024 | 8.45% | \$ | 40,000 | \$ | 3,380 |
| 7.400% | Due 2025 | 7.40% | \$ | 55,000 | \$ | 4,070 |
| 7.500% | Due 2026 | 7.50% | \$ | 40,000 | \$ | 3,000 |
| 7.950% | Due 2029 | 7.95% | \$ | 60,000 | \$ | 4,770 |
| 6.000% | Due 2033 | 6.00% | \$ | 100,000 | \$ | 6,000 |
| Total Amount Outstanding | | | \$ | 731,922 | \$ | 48,528 |

Cost of Long-Term Debt¹

6.63%

Source: Piedmont Natural Gas Company, Inc. Form 10-K for October 31, 2010.

South Jersey Industries Stated Cost of Long-Term Debt for Fiscal Year Ended December 31, 2010

| | | | | t Outstanding | <u> </u> | | |
|------------|------------------|---------------|--------|---------------|----------|------------|--|
| Long-Terr | n Debt | Interest Rate | (In Th | ousands) | Intere | st Expense | |
| First Mort | gage Bonds: (B) | | | | | | |
| 6.740% | Due 2011 | 6.740% | \$ | 10,000 | \$ | 674 | |
| 6.570% | Due 2011 | 6.570% | \$ | 15,000 | \$ | 986 | |
| 4.460% | Due 2013 | 4.460% | \$ | 10,500 | \$ | 468 | |
| 5.027% | Due 2013 | 5.027% | \$ | 14,500 | \$ | 729 | |
| 4.520% | Due 2014 | 4.520% | \$ | 11,000 | \$ | 497 | |
| 5.115% | Due 2014 | 5.115% | \$ | 10,000 | \$ | 512 | |
| 5.387% | Due 2015 | 5.387% | \$ | 10,000 | \$ | 539 | |
| 5.437% | Due 2016 | 5.437% | \$ | 10,000 | \$ | 544 | |
| 4.600% | Due 2016 | 4.600% | \$ | 17,000 | \$ | 782 | |
| 4.657% | Due 2017 | 4.657% | \$ | 15,000 | \$ | 699 | |
| 7.970% | Due 2018 | 7.970% | \$ | 10,000 | \$ | 797 | |
| 7.125% | Due 2018 | 7.125% | \$ | 20,000 | \$ | 1,425 | |
| 5.587% | Due 2019 | 5.587% | \$ | 10,000 | \$ | 559 | |
| 3.630% | Due 2025 | 3.630% | \$ | 10,000 | \$ | 363 | |
| 4.840% | Due 2026 | 4.840% | \$ | 15,000 | \$ | 726 | |
| 4.930% | Due 2026 | 4.930% | \$ | 45,000 | \$ | 2,219 | |
| 4.030% | Due 2027 | 4.030% | \$ | 45,000 | \$ | 1,814 | |
| 7.700% | Due 2027 | 7.700% | \$ | 35,000 | \$ | 2,695 | |
| 5.550% | Due 2033 | 5.550% | \$ | 32,000 | \$ | 1,776 | |
| 6.213% | Due 2034 | 6.213% | \$ | 10,000 | \$ | 621 | |
| 5.450% | Due 2035 | 5.450% | \$ | 10,000 | \$ | 545 | |
| Total Am | ount Outstanding | | \$ | 365,000 | \$ | 19,967 | |

Cost of Long-Term Debt¹

5.47%

Source: South Jersey Industries 2010 Form-10K.

WGL Holdings, Inc. Stated Cost of Long-Term Debt for Fiscal Year Ended September 30, 2010

| Long-Term Debt | Interest Rate | it Outstanding nousands) | Intere | st Expense |
|---------------------------------|---------------|-----------------------------|--------|------------|
| Unsecured Medium-Term Notes | | | | |
| 6.640% Due 2011 | 6.640% | \$ 30,000 | \$ | 1,992 |
| 5.975% 5.90% to 6.05%, Due 2012 | 5.975% | \$ 77,000 | \$ | 4,601 |
| 5.025% 4.88% to 5.17%, Due 2014 | 5.025% | \$ 67,000 | \$ | 3,367 |
| 4.830% Due 2015 | 4.830% | \$ 20,000 | \$ | 966 |
| 5.170% Due 2016 | 5.170% | \$ 25,000 | \$ | 1,293 |
| 7.460% Due 2019 | 7.460% | \$ 50,000 | \$ | 3,730 |
| 4.760% Due 2020 | 4.760% | \$ 50,000 | \$ | 2,380 |
| 6.650% Due 2023 | 6.650% | \$ 20,000 | \$ | 1,330 |
| 5.440% Due 2025 | 5.440% | \$ 40,500 | \$ | 2,203 |
| 6.610% 6.40% to 6.82%, Due 2027 | 6.610% | \$ 125,000 | \$ | 8,263 |
| 6.710% 6.57% to 6.85%, Due 2028 | 6.710% | \$ 52,000 | \$ | 3,489 |
| 7.500% Due 2030 | 7.500% | \$ 8,500 | \$ | 638 |
| 5.740% 5.70% to 5.78%, Due 2036 | 5.740% | \$ 50,000 | \$ | 2,870 |
| Other Long-Term Debt | | \$ 8,012 | | |
| Less: | | | | |
| Unamortized discount | | \$ (39) | | |
| Total Amount Outstanding | | \$ 622,973 | \$ | 37,120 |

Cost of Long-Term Debt¹

5.96%

Source: WGL Holdings, Inc.'s 2010 Form 10-K.

Stated Cost of Long-Term Debt for the Natural Gas Proxy Group as of Most Recent Fiscal Year End

| Company Name | Stated Cost of Long-Term Debt |
|------------------------------------|-------------------------------|
| AGL Resources, Inc. | 5.27% |
| Atmos Energy Corp. | 6.50% |
| NJR Corporation | 5.46% |
| Northwest Natural Gas | 6.25% |
| Piedmont Natural Gas Company, Inc. | 6.63% |
| South Jersey Industries, Inc. | 5.47% |
| WGL Holdings, Inc. | 5.96% |
| Average | 5.93% |

Stated Cost of Long-Term Debt 5.93%

Ten-Year Dividends Per Share, Earnings Per Share & Book Value Per Share Growth Rates for the Seven Comparable Natural Gas Distribution Companies

| | 10-Year | Annual Comp | ound Growth | Rates | |
|--|---------|--------------------|-------------|-------|--|
|--|---------|--------------------|-------------|-------|--|

| Company Name | DPS | EPS | BVPS | Average of 10 Year Annual Compound Growth Rates |
|-------------------------------|--------------|--------------|--------------|---|
| AGL Resources, Inc. | 5.00% | 9.00% | 7.00% | 7.00% |
| Atmos Energy Corporation | 2.00% | 5.00% | 6.50% | 4.50% |
| New Jersey Resources Corp. | 5.00% | 8.50% | 8.50% | 7.33% |
| Northwest Natural Gas Co. | 2.00% | 6.00% | 3.50% | 3.83% |
| Piedmont Natural Gas Co. | 4.50% | 5.00% | 5.00% | 4.83% |
| South Jersey Industries, Inc. | 5.50% | 10.50% | 10.50% | 8.83% |
| WGL Holdings, Inc. | <u>2.00%</u> | <u>4.00%</u> | <u>4.00%</u> | <u>3.33%</u> |
| Average | <u>3.71%</u> | <u>6.86%</u> | <u>6.43%</u> | <u>5.67%</u> |

Source: The Value Line Investment Survey: Ratings & Reports, June 10, 2011.

Five-Year Dividends Per Share, Earnings Per Share & Book Value Per Share Growth Rates for the Seven Comparable Natural Gas Distribution Companies

| | 5-Year Annual Compound Growth Rates | |
|--|-------------------------------------|--|
|--|-------------------------------------|--|

| Company Name | DPS | <u>EPS</u> | BVPS | Average of 5 Year Annual Compound Growth Rates |
|-------------------------------|-------|------------|--------|--|
| AGL Resources, Inc. | 7.50% | 4.50% | 5.50% | 5.83% |
| Atmos Energy Corporation | 1.50% | 4.00% | 5.00% | 3.50% |
| New Jersey Resources Corp. | 7.50% | 8.50% | 10.00% | 8.67% |
| Northwest Natural Gas Co. | 3.50% | 9.50% | 4.00% | 5.67% |
| Piedmont Natural Gas Co. | 4.50% | 5.00% | 3.50% | 4.33% |
| South Jersey Industries, Inc. | 8.50% | 9.50% | 8.00% | 8.67% |
| WGL Holdings, Inc. | 2.50% | 2.50% | 5.00% | 3.33% |
| Average | 5.07% | 6.21% | 5.86% | 5.71% |

Source: The Value Line Investment Survey: Ratings & Reports, June 10, 2011.

Five-Year Projected Dividends Per Share, Earnings Per Share & Book Value Per Share Growth Rates for the Seven Comparable Natural Gas Distribution Utility Companies

----- 5-Year Projected Compound Growth Rates ------

| Company Name | DPS | _EPS_ | BVPS | Annual Compound Growth Rates |
|------------------------------------|-------|-------|-------|------------------------------|
| AGL Resources, Inc. | 3.00% | 5.00% | 6.00% | 4.67% |
| Atmos Energy Corporation | 2.00% | 5.00% | 4.50% | 3.83% |
| New Jersey Resources Corporation | 4.50% | 4.00% | 6.00% | 4.83% |
| Northwest Natural Gas | 3.50% | 4.50% | 6.50% | 4.83% |
| Piedmont Natural Gas Company, Inc. | 3.50% | 3.00% | 3.00% | 3.17% |
| South Jersey Industries, Inc. | 8.50% | 9.00% | 6.50% | 8.00% |
| WGL Holdings, Inc. | 2.50% | 1.50% | 3.50% | 2.50% |
| Average | 3.93% | 4.57% | 5.14% | 4.55% |

Source: The Value Line Investment Survey: Ratings & Reports, June 10, 2011.

5 Year

Historical and Projected Growth Rates for the Seven Comparable Natural Gas Distribution Companies

| | 1 Historical | 2 Historical | 3 | 4 | 5 |
|------------------------------------|-----------------|-----------------|-------------|------------|------------|
| | 10-Year | 5-Year | | Projected | |
| | Average | Average | Projected | 5-Year | Projected |
| | Growth Rate | Growth Rate | Growth Rate | EPS Growth | 3-5 Year |
| 0 1 | (DPS, EPS | (DPS, EPS | (DPS, EPS | Reuters | EPS Growth |
| Company Name | and BVPS) | and BVPS) | and BVPS) | (Mean) | Value Line |
| AGL Resources, Inc. | 7.00% | 5.83% | 4.67% | 5.17% | 5.00% |
| Atmos Energy Corporation | 4.50% | 3.50% | 3.83% | 3.88% | 5.00% |
| New Jersey Resources Corporation | 7.33% | 8.67% | 4.83% | 3.04% | 4.00% |
| Northwest Natural Gas | 3.83% | 5.67% | 4.83% | 3.88% | 4.50% |
| Piedmont Natural Gas Company, Inc. | 4.83% | 4.33% | 3.17% | 4.38% | 3.00% |
| South Jersey Industries, Inc. | 8.83% | 8.67% | 8.00% | 7.00% | 9.00% |
| WGL Holdings, Inc. | 3.33% | 3.33% | 2.50% | 3.67% | 1.50% |
| | 5.67% | 5.71% | 4.55% | 4.43% | 4.57% |

Proposed range of growth

4.00%-5.00%

Sources:

Column 1 = Schedule 10 - 1

Column 2 = Schedule 10 - 2

Column 3 = Schedule 10 - 3

Column 4 = Reuters Website, July 05, 2011

Column 5 = The Value Line Investment Survey: Ratings and Reports, June 10, 2011.

Average High / Low Stock Price for April through June 2011 for the Seven Comparable Natural Gas Distribution Companies

| | 1 | 2 | 3 | 4 | 5 | 6 | 7 |
|-------------------------------|------------------------|-----------------------|------------------------|-----------------------|------------------------|-----------------------|---|
| | April 2011 | | May 2011 | | June | June 2011 | |
| Company Name | High Stock Price | Low Stock Price | High Stock Price | Low Stock Price | High Stock Price | Low Stock Price | High/Low Stock Price (04/11 - 06/11) |
| AGL Resources, Inc. | \$41.610 | \$38.580 | \$42.340 | \$39.800 | \$41.090 | \$38.750 | \$40.362 |
| Atmos Energy Corp. | \$34.940 | \$32.760 | \$35.080 | \$32.640 | \$33.430 | \$31.230 | \$33.347 |
| New Jersey Resources Corp. | \$44.100 | \$41.220 | \$46.290 | \$42.800 | \$46.040 | \$42.590 | \$43.840 |
| Northwest Natural Gas Co. | \$46.370 | \$44.080 | \$46.400 | \$44.250 | \$45.320 | \$43.570 | \$44.998 |
| Piedmont Natural Gas Co. | \$32.000 | \$29.000 | \$31.980 | \$30.370 | \$31.500 | \$28.800 | \$30.608 |
| South Jersey Industries, Inc. | \$58.030 | \$54.050 | \$57.530 | \$53.690 | \$56.040 | \$50.640 | \$54.997 |
| WGL Holdings, Inc. | \$39.680 | \$36.930 | \$39.740 | \$37.100 | \$39.240 | \$37.000 | \$38.282 |

Notes:

Column 7 = [(Column 1 + Column 2 + Column 3 + Column 4 + Column 5 + Column 6) / 6].

Source:

Yahoo finance website

 $\underline{http://finance.yahoo.com/q/hp?s=WGL\&a=03\&b=1\&c=2011\&d=05\&e=30\&f=2011\&g=m}$

Discounted Cash Flow (DCF) Estimated Costs of Common Equity for the Seven Comparable Natural Gas Distribution Companies

2

3

8.23%

8.25%

9.23% 9.25%

8.75%

1

| Company Name | Expected Annual ¹ Dividend | Average High/Low Stock Price | Projected Dividend Yield | |
|-------------------------------|---|---------------------------------------|--------------------------------|-------|
| AGL Resources, Inc. | \$1.82 | \$40.362 | 4.51% | |
| Atmos Energy Corp. | \$1.37 | \$33.347 | 4.11% | |
| New Jersey Resources Corp. | \$1.46 | \$43.840 | 3.33% | |
| Northwest Natural Gas Co. | \$1.76 | \$44.998 | 3.91% | |
| Piedmont Natural Gas Co. | \$1.17 | \$30.608 | 3.82% | |
| South Jersey Industries, Inc. | \$1.54 | \$54.997 | 2.80% | |
| WGL Holdings, Inc. | \$1.57 | \$38.282 | 4.10% | |
| Average | | | 3.80% | |
| | Proposed Dividend Yiel | d: | | 3.80% |
| | Proposed Range of Gro | 4.00% - | 5.00% | |
| | Estimated Proxy Cost o | 7.80% - | 8.80% | |
| | 2 | | 0.43% | |

Recommended Cost of Common Equity

Notes:

Sources:

Column 1 = The Value Line Investment Survey: Ratings and Reports, June 10, 2011.

Midpoint

Column 2 = Schedule 11-1.

^{1 =} Estimated Dividends Declared per share based on 50% weight given to 2011 and 50% to 2012.

^{2 =} Three month average (April - June 2011) of differences between 'A' - rated 'BBB' - rated 30-year bonds from Reuters Corporate Spreads for Utilities - BondsOnline data.

Capital Asset Pricing Model (CAPM) Costs of Common Equity Estimates Based on Historical Return Differences Between Common Stocks and Long-Term U.S. Treasuries for the Seven Comparable Natural Gas Distribution Companies

| | 1 | 2 | 3 | 4 | 5 | 6 |
|-------------------------------|-------|------------|-------------|-------------|-------------|-------------|
| | | | Arithmetic | Geometric | Arithmetic | Geometric |
| | | | Average | Average | CAPM | CAPM |
| | | | Market | Market | Cost of | Cost of |
| | Risk | Company's | Risk | Risk | Common | Common |
| | Free | Value Line | Premium | Premium | Equity | Equity |
| Company Name | Rate | Beta | (1926-2010) | (1926-2010) | (1926-2010) | (1926-2010) |
| AGL Resources, Inc. | 4.34% | 0.75 | 6.00% | 4.40% | 8.84% | 7.64% |
| Atmos Energy Corp. | 4.34% | 0.70 | 6.00% | 4.40% | 8.54% | 7.42% |
| New Jersey Resources Corp. | 4.34% | 0.65 | 6.00% | 4.40% | 8.24% | 7.20% |
| Northwest Natural Gas Co. | 4.34% | 0.60 | 6.00% | 4.40% | 7.94% | 6.98% |
| Piedmont Natural Gas Co. | 4.34% | 0.65 | 6.00% | 4.40% | 8.24% | 7.20% |
| South Jersey Industries, Inc. | 4.34% | 0.65 | 6.00% | 4.40% | 8.24% | 7.20% |
| WGL Holdings, Inc. | 4.34% | 0.65 | 6.00% | 4.40% | 8.24% | 7.20% |
| Average | | 0.66 | | | 8.33% | 7.26% |

Sources:

- Column 1 = The appropriate yield is equal to the average 30-year U.S. Treasury Bond yield for April, May and June 2011 which was obtained from the St. Louis Federal Reserve website at http://research.stlouisfed.org/fred2/series/GS30/22.
- Column 2 = Beta is a measure of the movement and relative risk of an individual stock to the market as a whole as reported by the Value Line Investment Survey: Ratings & Reports, June 10, 2011.
- Column 3 = The Market Risk Premium represents the expected return from holding the entire market portfolio less the expected return from holding a risk free investment. The appropriate Market Risk Premium for the period 1926 2010 was determined to be 6.00% based on an arithmetic average as calculated in Ibbotson Associates, Inc.'s Stocks, Bonds, Bills, and Inflation: 2011 Yearbook.
- Column 4 = The Market Risk Premium represents the expected return from holding the entire market portfolio less the expected return from holding a risk free investment. The appropriate Market Risk Premium for the period 1926 2010 was determined to be 4.40% based on ageometric average as calculated in Ibbotson Associates, Inc.'s Stocks, Bonds, Bills, and Inflation: 2011 Yearbook.

Column 5 = (Column 1 + (Column 2 * Column 3)).

Column 6 = (Column 1 + (Column 2 * Column 4)).

Weighted Cost of Capital for Veolia Energy Kansas City, Inc.

Weighted Cost of Capital Using Common Equity Return of:

| | | | Common Equity Return of: | | | |
|-------------------|-----------------------|------------------|--------------------------|-------|-------|--|
| Capital Component | Percentage of Capital | Embedded Cost | 8.25% | 8.75% | 9.25% | |
| | | | | | | |
| Common Equity | 49.00% | | 4.04% | 4.29% | 4.53% | |
| Long-Term Debt | 51.00% | 5.93% | 3.03% | 3.03% | 3.03% | |
| | 100.00% | | 7.07% | 7.31% | 7.56% | |

Sources: Schedule 7