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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ER-2022-0130

DIRECT TESTIMONY

OF

ANN E. BULKLEY

ON BEHALF OF

EVERGY MISSOURI WEST

Kansas City, Missouri

January 2022

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**DIRECT TESTIMONY
OF
ANN E. BULKLEY
File No. ER-2022-0130**

1 **I. INTRODUCTION**

2 **Q: Please state your name and business address.**

3 A: My name is Ann E. Bulkley. My business address is 293 Boston Post Road West, Suite
4 500, Marlborough, Massachusetts 01752. I am employed by Concentric Energy Advisors,
5 Inc. (“Concentric”) as a Senior Vice President.

6 **Q: On whose behalf are you submitting this Prepared Direct Testimony?**

7 A: I am submitting this testimony before the Missouri Public Service Commission
8 (“Commission”) on behalf of Evergy Missouri West, Inc. d/b/a Evergy Missouri West
9 (“Evergy Missouri West” or the “Company”), a wholly-owned subsidiary of Evergy, Inc.
10 (“Evergy”).

11 **Q: Please describe your education and experience.**

12 A: I hold a Bachelor’s degree in Economics and Finance from Simmons College and a
13 Master’s degree in Economics from Boston University, with more than 25 years of
14 experience consulting to the energy industry. I have advised numerous energy and utility
15 clients on a wide range of financial and economic issues with primary concentrations in
16 valuation and utility rate matters. Many of these assignments have included the
17 determination of the cost of capital for valuation and ratemaking purposes. I have included
18 my resume and a summary of testimony that I have filed in other proceedings as
19 Attachment A.

1 **Q: Please describe Concentric’s activities in energy and utility engagements.**

2 A: Concentric provides financial and economic advisory services to many and various energy
3 and utility clients across North America. Our regulatory, economic, and market analysis
4 services include utility ratemaking and regulatory advisory services; energy market
5 assessments; market entry and exit analysis; corporate and business unit strategy
6 development; demand forecasting; resource planning; and energy contract negotiations.
7 Our financial advisory activities include buy- and sell-side merger, acquisition, and
8 divestiture assignments; due diligence and valuation assignments; project and corporate
9 finance services; and transaction support services. In addition, we provide litigation support
10 services on a wide range of financial and economic issues on behalf of clients throughout
11 North America.

12 **Q: Please describe the purpose of your testimony.**

13 A: The purpose of my testimony is to present evidence and provide a recommendation
14 regarding the appropriate Return on Equity (“ROE”)¹ and overall rate of return to be used
15 for ratemaking purposes. The overall rate of return incorporates the testimony of Company
16 witness Kirkland B. Andrews, who provides evidence to support the Company’s capital
17 structure and cost of debt. I also address the appropriateness of the Company’s proposed
18 capital structure, as supported by Mr. Andrews.

¹ Throughout my Direct Testimony, I interchangeably use the terms “ROE” and “cost of equity”.

1 **Q: Was your testimony, including associated schedules, prepared by you or under your**
2 **control and direction?**

3 A: Yes. My analyses and recommendations are supported by the data presented in Schedule
4 AEB-1 through Schedule AEB-15, which were prepared by me or under my direction.

5 **Q: How is the remainder of your testimony organized?**

6 A: Section II provides a summary of my analyses and conclusions. Section III reviews the
7 regulatory guidelines pertinent to the development of the cost of capital. Section IV
8 discusses current and projected capital market conditions and the effect of those conditions
9 on Evergy Missouri West's cost of equity. Section V explains my selection of a proxy
10 group of electric utilities. Section VI describes my analyses and the analytical basis for the
11 recommendation of the appropriate ROE for Evergy Missouri West. Section VII provides
12 a discussion of specific regulatory, business, and financial risks that have a direct bearing
13 on the ROE to be authorized for the Company in this case. Section VIII assesses the
14 proposed capital structure, cost of debt and overall rate of return of Evergy Missouri West.
15 Section IX presents my conclusions and recommendations for the market cost of equity.

16 **II. SUMMARY OF ANALYSES AND CONCLUSIONS**

17 **Q: Please provide a brief overview of the analyses that led to your ROE recommendation.**

18 A: As discussed in more detail in Section VI, in developing my ROE recommendation, I
19 applied the Constant Growth form of the Discounted Cash Flow ("DCF") model, the
20 Capital Asset Pricing Model ("CAPM"), the Empirical Capital Asset Pricing Model
21 ("ECAPM"), and the Risk Premium Approach. I also considered several additional risk
22 factors that affect the Company's required ROE, including: (1) the Company's capital
23 expenditure requirements; (2) Evergy Missouri West's retirement of the Sibley coal

1 generating plant; (3) Evergy Missouri West's planned investments in renewable generation
2 assets compared to its current generation portfolio; and (4) the regulatory environment in
3 which the Company operates. While I did not make any specific adjustments to my ROE
4 estimates for any of these factors, I did take them into consideration in aggregate when
5 determining where the Company's Cost of Equity falls within the range of analytical
6 results. Additionally, I considered the Company's proposed capital structure as compared
7 to the capital structures of the proxy companies.² Finally, I considered the Company's long-
8 term cost of debt by comparing the cost of each of Evergy Missouri West's long-term debt
9 issuances to the market at the time of issuance.

10 **Q: Please summarize the key factors considered in your analyses and upon which you**
11 **base your recommended ROE.**

12 **A:** In developing my recommended ROE for Evergy Missouri West, I considered the
13 following:

- 14 • The *Hope* and *Bluefield* decisions³ that established the standards for determining a
15 fair and reasonable allowed ROE, including consistency of the allowed return with
16 the returns of other businesses having similar risk, adequacy of the return to provide
17 access to capital and support credit quality, and the requirement that the result lead
18 to just and reasonable rates.
- 19 • The effect of current and projected capital market conditions on investors' return
20 requirements.
- 21 • The results of several analytical approaches that provide estimates of the
22 Company's cost of equity.

² The selection and purpose of developing a group of comparable companies will be discussed in detail in Section V of my Direct Testimony.

³ Federal Power Commission v. Hope Natural Gas Co., 320 U.S. 591 (1944); Bluefield Waterworks & Improvement Co. v. Public Service Commission of West Virginia, 262 U.S. 679 (1923).

- 1 • The Company’s regulatory, business, and financial risks relative to the proxy group
2 of comparable companies, and the implications of those risks.

3 **Q: Please explain how you considered those factors.**

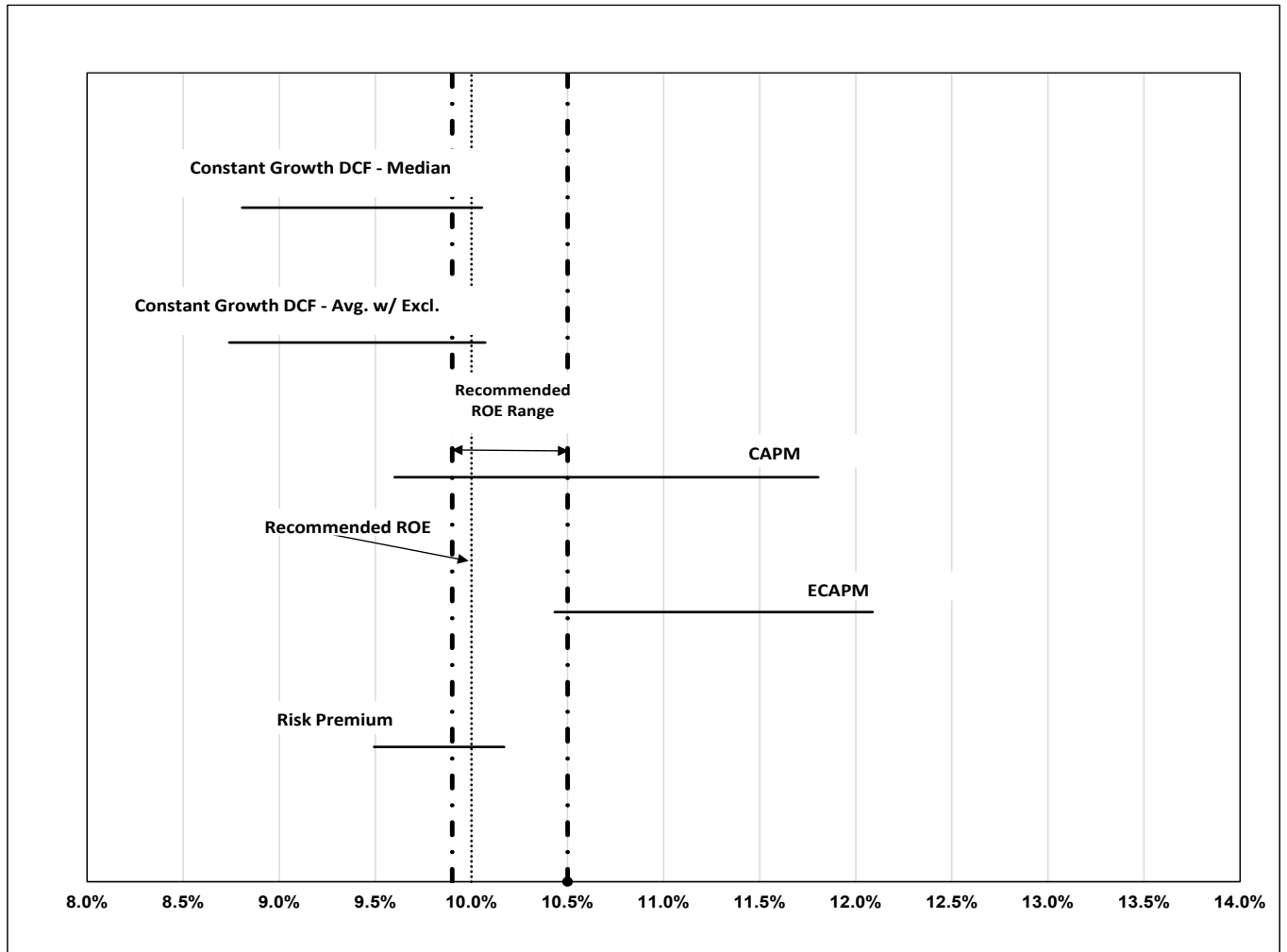
4 A: After considering these factors and the results of my analyses, I relied on the range of
5 results produced by the Constant Growth DCF model, the CAPM and ECAPM and a Risk
6 Premium analysis. As shown in Figure 1, these ROE estimation models produce a wide
7 range of results. My conclusion as to where, within that range of results, Evergy Missouri
8 West’s cost of equity falls is based on my assessment of market conditions, and the
9 Company’s business and financial risk relative to the proxy group. Although the
10 companies in my proxy group are generally comparable to Evergy Missouri West, each
11 company is unique, and no two companies have the exact same business and financial risk
12 profiles. Accordingly, I considered the Company’s business and financial risk in the
13 aggregate in comparison to that of the proxy group companies when determining where the
14 Company’s ROE falls within the reasonable range of analytical results to account for any
15 residual differences in risk.

16 **Q: Please summarize the results of the ROE estimation models that you considered to**
17 **establish the range of ROEs for Evergy Missouri West.**

18 A: Figure 1 summarizes the range of results produced by the Constant Growth DCF, CAPM,
19 ECAPM, and Bond Yield Plus Risk Premium analysis.

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Figure 1: Summary of Cost of Equity Analytical Results⁴



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As shown in Figure 1 (and in Schedule AEB-1), the range of results produced by the ROE estimation models is wide. While it is common to consider multiple models to estimate the cost of equity, it is particularly important when the range of results varies considerably across methodologies. As a result, my ROE recommendation considers the range of results of the Constant Growth DCF model, as well as the results of the CAPM, ECAPM, and Bond Yield Plus Risk Premium

⁴ Constant Growth DCF analysis - Average w/ Exclusions represents the DCF results excluding the results for individual companies that did not meet the minimum threshold of 7 percent.

1 analyses. My ROE recommendation also considers Evergy Missouri West's
2 company-specific risk factors and current and prospective capital market
3 conditions.

4 **Q: What is your recommended ROE for Evergy Missouri West?**

5 A: Based on the analytical results presented in Figure 1, as well as the level of regulatory,
6 business, and financial risk faced by Evergy Missouri West relative to the proxy group, I
7 believe a range from 9.90 to 10.50 percent is reasonable. This recommendation reflects the
8 range of results for the proxy group companies, the relative risk of Evergy Missouri West
9 as compared to the proxy group, and current capital market conditions. Within that range,
10 the Company is requesting an ROE of 10.00 percent, which is reasonable.

11 **Q: Please summarize the analysis you conducted in determining that Evergy Missouri**
12 **West's requested capital structure is reasonable and appropriate.**

13 A: Based on the analysis presented in Section VIII of my testimony, I conclude that Evergy
14 Missouri West's proposed 51.81 percent common equity is reasonable. To determine if
15 Evergy Missouri West's requested capital structure was reasonable, I reviewed the capital
16 structures of the utility subsidiaries of the proxy companies. As shown in Schedule AEB-
17 14, the results of that analysis demonstrate that the average equity ratios for the utility
18 operating companies of the proxy group range from 46.97 percent to 60.85 percent, with
19 an average of 52.86 percent. Comparing the recommended equity ratio to the proxy group
20 demonstrates that the Company's requested equity ratio is well within the range of equity
21 ratios for the utility operating subsidiaries of the proxy group companies. Further, the
22 Company's proposed equity ratio is reasonable considering the negative effect of the Tax

1 Cuts and Jobs Act of 2017 and COVID-19 on the cash flows and credit metrics of regulated
2 utilities.

3 **Q: Please summarize the analysis you conducted in determining that Evergy Missouri**
4 **West’s requested long-term cost of debt rate was reasonable and appropriate.**

5 A: As will be discussed in more detail in Section VIII, I compared the cost of each long-term
6 debt issuance for Evergy Missouri West to the market at the time of issuance. I compared
7 the embedded cost of long-term debt to the Moody’s Investors Service (“Moody’s”) Baa
8 and A-rated utility bond indexes as the estimate of the market. That analysis indicates that
9 the Company’s embedded cost of long-term debt is reasonable.

10 **III. REGULATORY GUIDELINES**

11 **Q: Please describe the guiding principles to be used in establishing the cost of capital for**
12 **a regulated utility.**

13 A: The United States Supreme Court’s precedent-setting *Hope and Bluefield* cases established
14 the standards for determining the fairness or reasonableness of a utility’s allowed ROE.
15 Among the standards established by the Court in those cases are: (1) consistency with other
16 businesses having similar or comparable risks; (2) adequacy of the return to support credit
17 quality and access to capital; and (3) the principle that the result reached, as opposed to the
18 methodology employed, is the controlling factor in arriving at just and reasonable rates.⁵

⁵ *Hope*, 320 U.S. 591 (1944); *Bluefield*, 262 U.S. 679 (1923).

1 **Q: Has the Missouri Public Service Commission (“Commission”) provided similar**
2 **guidance in establishing the appropriate return on common equity?**

3 A: Yes. The Commission follows the precedents of the *Hope* and *Bluefield* cases and
4 acknowledges that utility investors are entitled to a fair and reasonable return. This position
5 was set forth by the Commission as follows:

6 The standard for rates is “just and reasonable,” a standard founded on
7 constitutional provisions, as the United States Supreme Court has
8 explained. But the Commission must also consider the customers.
9 Balancing the interests of investor and consumer is not reducible to a single
10 formula, and making pragmatic adjustments is part of the Commission’s
11 duty. Thus, the law requires a just and reasonable end, but does not specify
12 a means. The Commission is charged with approving rate schedules that
13 are as “just and reasonable” to consumers as they are to the utility.⁶

14 Based on these standards, the authorized ROE should provide the Company with a fair and
15 reasonable return and should provide access to capital on reasonable terms in a variety of
16 market conditions.

17 **Q: Why is it important for a utility to be allowed the opportunity to earn an ROE that is**
18 **adequate to attract capital at reasonable terms?**

19 A: An ROE that is adequate to attract capital at reasonable terms enables the Company to
20 continue to provide safe, reliable electric service while maintaining its financial integrity.
21 That return should be commensurate with returns expected elsewhere in the market for
22 investments of equivalent risk. If it is not, debt and equity investors will seek alternative
23 investment opportunities for which the expected return reflects the perceived risks, thereby
24 inhibiting the Company’s ability to attract capital at reasonable cost.

⁶ In the Matter of Kansas City Power & Light Company’s Request for Authority to Implement a General Rate Increase for Electric Service, File No. ER-2012-0174, Report and Order, at 11 (Jan. 9, 2013).

1 **Q: Is a utility's ability to attract capital also affected by the ROEs that are authorized**
2 **for other utilities?**

3 A: Yes. Evergy Missouri West competes directly for capital with other investments of similar
4 risk, which include other vertically integrated electric utilities. The ROE awarded to a
5 utility sends an important signal to investors regarding whether there is regulatory support
6 for financial integrity, dividends, growth, and fair compensation for business and financial
7 risk. The cost of capital represents an opportunity cost to investors. If higher returns are
8 available for other investments of comparable risk, investors have an incentive to direct
9 their capital to those investments. Thus, an authorized ROE that is not commensurate with
10 authorized ROEs for other vertically integrated electric utilities can inhibit Evergy
11 Missouri West's ability to attract capital for investment in Missouri. Such capital
12 investment is clearly a goal of Missouri, given the enactment of S.S. 564 in 2018 (Plant in
13 Service Accounting) and H.B. 734 in 2021 (Electric Utility Financing & Securitization).

14 **Q: What are your conclusions regarding regulatory guidelines?**

15 A: The ratemaking process is premised on the principle that a utility must have the opportunity
16 to recover the return of, and the market-required return on, its invested capital. Because
17 utility operations are capital-intensive, regulatory decisions should enable the utility to
18 attract capital at reasonable terms under a variety of economic and financial market
19 conditions; doing so balances the long-term interests of the utility and its customers.

20 The financial community carefully monitors the current and expected financial condition
21 of utility companies and the regulatory frameworks in which they operate. In that respect,
22 the regulatory framework is one of the most important factors in both debt and equity
23 investors' assessments of risk. The Commission's order in this proceeding, therefore,

1 should establish rates that provide the Company with the opportunity to earn an ROE that
2 is: (1) adequate to attract capital at reasonable terms under a variety of economic and
3 financial market conditions; (2) sufficient to ensure good financial management and firm
4 integrity; and (3) commensurate with returns on investments in enterprises with similar
5 risk. Providing Evergy Missouri West the opportunity to earn its market-based cost of
6 capital supports the financial integrity of the Company, which is in the interest of both
7 customers and shareholders.

8 **Q: Does the fact that the Company is owned by Evergy, a publicly-traded company,**
9 **affect your analysis?**

10 A: No, it does not. In this proceeding, consistent with stand-alone ratemaking principles, it is
11 appropriate to establish the cost of equity for Evergy Missouri West, not its publicly-traded
12 parent Evergy. More importantly however, it is appropriate to establish a return on equity
13 and capital structure that provide Evergy Missouri West the ability to attract capital on
14 reasonable terms, on a stand-alone basis, and within the Evergy system.

16 **IV. CAPITAL MARKET CONDITIONS**

17 **Q: Why is it important to analyze capital market conditions?**

18 A: The ROE estimation models rely on market data that are either specific to the proxy group,
19 in the case of the DCF model, or to the expectations of market risk, in the case of the
20 CAPM. The results of the ROE estimation models can be affected by prevailing market
21 conditions at the time the analysis is performed. While the ROE that is established in a
22 rate proceeding is intended to be forward-looking, the analyst uses current and projected

1 market data, specifically stock prices, dividends, growth rates and interest rates in the ROE
2 estimation models to estimate the required return for the subject company.

3 As discussed in the remainder of this section, analysts and regulatory commissions have
4 concluded that current market conditions have affected the results of the ROE estimation
5 models. As a result, it is important to consider the effect of these conditions on the ROE
6 estimation models when determining the appropriate range and recommended ROE for a
7 future period. If investors do not expect current market conditions to be sustained in the
8 future, it is possible that the ROE estimation models will not provide an accurate estimate
9 of investors' required return during that rate period. Therefore, it is very important to
10 consider projected market data to estimate the return for that forward-looking period.

11 **Q: What factors are affecting the cost of equity for regulated utilities in the current and**
12 **prospective capital markets?**

13 A: The cost of equity for regulated utility companies is being affected by several factors in the
14 current and prospective capital markets, including: (1) the dramatic shifts in market
15 conditions during 2020, the economic recovery in 2021 and the expectations for 2022, and
16 the effect of these changes on the assumptions used in the ROE estimation models; and (2)
17 effects of Federal tax reform on utility cash flows. In this section, I discuss each of these
18 factors and how it affects the models used to estimate the cost of equity for regulated
19 utilities.

1 **A. Economic Recovery and Performance of the Utility Sector**

2 **Q: Do recent economic projections indicate the expectation for a continued economic**
3 **recovery in 2022?**

4 A: Yes. The Federal Open Market Committee (“FOMC”) is composed of twelve members
5 including the Board of Governors of the Federal Reserve system and presidents of the
6 Federal Reserve Banks. The FOMC reviews economic and financial conditions, determines
7 the appropriate stance for monetary policy and assess the risks to its long-run goals of price
8 stability and economic growth. The FOMC issued its Summary of Economic Projections
9 in December 2021, where the FOMC’s median projection for GDP growth from Q4 2021
10 to Q4 2022 is 4.0 percent.⁷ The Congressional Budget Office (“CBO”) issued an update
11 to its outlook on economic conditions on July 1, 2021. In that report, the CBO projected
12 strong GDP growth for 2021 and beyond and significant strength in overall economic
13 conditions including:

- 14 • Real GDP growth of 7.4 percent in 2021 and 3.1 percent in 2022, which is a
15 significant change from the negative 2.4 percent growth rate in 2020;
- 16 • Inflation indicators at or above the 2.0 percent threshold in 2021 and continuing
17 through 2031;
- 18 • Labor force expected to be restored to pre-pandemic levels in 2022; and
- 19 • Interest rates on federal borrowing increasing through 2031.⁸

20 These trends indicate strong economic recovery over the next year, with robust
21 consumer spending expected.

⁷ Federal Open Market Committee, Summary of Economic Projections, at 2 (Sept. 22, 2021).

⁸ Congressional Budget Office, An Update to the Budget and Economic Outlook 2021 to 2031, July 2021.

1 **Q: Please summarize the monetary policy actions of the Federal Reserve in response to**
2 **COVID-19.**

3 A: In response to the COVID-19 pandemic, the Federal Reserve has:

4 • Decreased the Federal Funds rate twice in March 2020, resulting in a target range
5 of 0.00 percent to 0.25 percent;

6 • Increased its holdings of both Treasury and mortgaged-back securities;

7 • Started expansive programs to support credit to large employers – the Primary
8 Market Corporate Credit Facility to provide liquidity for new issuances of corporate
9 bonds; and the Secondary Market Corporate Credit Facility to provide liquidity for
10 outstanding corporate debt issuances; and

11 • Supported the flow of credit to consumers and businesses through the Term Asset-
12 Backed Securities Loan Facility.

13 In addition, Congress also passed the Coronavirus Aid, Relief, and Economic
14 Security (“CARES”) Act in March 2020, the Consolidated Appropriations Act,
15 2021 in December 2020 and the American Rescue Plan Act in March 2021, which
16 included \$2.2 trillion, \$900 billion and \$1.9 trillion, respectively, in fiscal stimulus
17 aimed at also mitigating the economic effects of COVID-19. These expansive
18 monetary and fiscal programs mitigated the economic effects of the COVID-19
19 pandemic and are currently providing additional support as the economy recovers
20 from the COVID-19 recession.

21 **Q: Are there indications the Federal Reserve is normalizing monetary policy?**

22 A: Yes. Most recently at the December 15, 2021 meeting, in response to inflation exceeding
23 the Federal Reserve’s target of 2 percent for a sustained period of time, the Federal Reserve
24 decided to increase the pace of its taper of bond purchases. Beginning in January, the

1 Federal Reserve will reduce asset purchases of Treasuries by \$20 billion and mortgage-
2 backed securities by \$10 billion on a monthly basis.⁹ This change is double the initial plan
3 outlined at the November 2, 2021 meeting which called for reducing asset purchases of
4 Treasuries by \$10 billion and mortgage-backed securities by \$5 billion on a monthly.¹⁰
5 Moreover, the Federal Reserves' FOMC is now forecasting three increases in the federal
6 funds rate by the end of 2022¹¹ which is a substantial increase from the one increase that
7 was forecasted by the FOMC at the September 22, 2021 meeting.¹²

8 **Q: Why has the Federal Reserve decided to normalize monetary policy?**

9 A: The Federal Reserve has accelerated plans to normalize monetary policy in response to
10 increasing inflation. While the Federal Reserve initially viewed inflation as transitory, it
11 has been higher and more persistent than the target levels and is expected to continue in
12 2022.

13 **Q: Is the increase in inflation in 2021 significant?**

14 A: Yes. As shown in Figure 2, the year over year (“YOY”) change in the Consumer Price
15 Index (“CPI”) published by the Bureau of Labor statistics has increased steadily in 2021
16 rising from 1.37 percent in January to 6.88 percent in November. The 6.88 percent YOY
17 change in the CPI in November 2021 is significantly greater than any level seen since
18 January 2008.

⁹ Federal Reserve, Press Release, (Dec. 15, 2021).

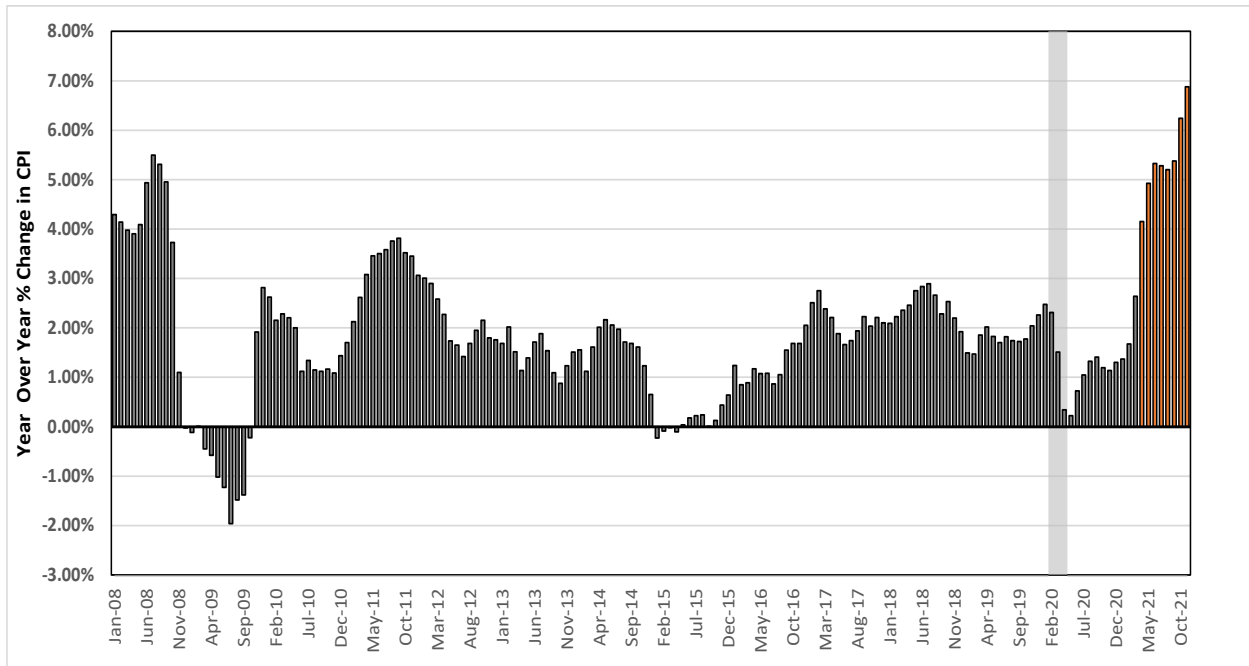
¹⁰ Federal Reserve, Press Release, (Nov. 3, 2021).

¹¹ Federal Reserve, Summary of Economic Projections, (Dec. 15, 2021).

¹² Federal Reserve, Summary of Economic Projections, (Sept. 22, 2021).

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**Figure 2: Consumer Price Index – YOY Percent Change –
January 2015 – November 2021¹³**



3

4 **Q: What are investors’ expectations for inflation over the near-term?**

5 A: Investors expect inflation to persist into 2022. For example, Goldman Sachs forecasts
6 consumer price inflation excluding food and energy costs to still be above 4 percent when
7 the Federal Reserve ends their tapering of bond purchases in 2022.¹⁴ Similarly,
8 respondents to the recent CNBC Fed Survey, indicated the CPI is expected to rise 3.5
9 percent in 2022 which is an increase from the September Survey of 3.00 percent.¹⁵
10 Finally, Kiplinger recently noted the following regarding inflation expectations over the
11 near-term:

¹³ Source: Bureau of Labor Statistics (Nov. 10, 2021), shaded area indicates the COVID-19 pandemic recession.

¹⁴ Kennedy, Simon. “Goldman Now Sees Fed Hiking Rates in July as Inflation Lingers.” Bloomberg.com, Bloomberg, (Oct. 30, 2021), <https://www.bloomberg.com/news/articles/2021-10-30/goldman-now-sees-fed-hiking-rates-in-july-as-inflation-lingers>.

¹⁵ Liesman, Steve. “Investors Expect a Faster Pace for Fed Rate Hikes, CNBC Survey Shows.” CNBC, CNBC, (Nov. 2, 2021), <https://www.cnbc.com/2021/11/02/investors-expect-a-faster-pace-for-fed-rate-hikes-cnbc-survey-shows.html>.

1 Inflation at the end of next year should be about 2.7%, down from 6.6% at
2 the end of 2021. It's expected that an easing of supply chain shortages next
3 year will bring some price relief, especially to sky-high motor vehicle
4 prices. But, these shortages are expected to only gradually resolve during
5 2022. Also, worker shortages may last longer than expected, keeping wage
6 growth high and forcing businesses to pass some of those costs on to
7 consumers. So, inflation should remain higher than its 1.7% average over
8 the past ten years.¹⁶

9 According to Kiplinger, the higher levels of inflation will likely result in the Federal
10 Reserve increasing the federal funds rate in 2022 instead of 2023 as originally planned.¹⁷

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17 Kiplinger recently noted the following regarding inflation expectations over the near-term:

18 Inflation at the end of next year should be about 2.7%, down from 6.6% at
19 the end of 2021. It's expected that an easing of supply chain shortages next
20 year will bring some price relief, especially to sky-high motor vehicle
21 prices. But, these shortages are expected to only gradually resolve during
22 2022. Also, worker shortages may last longer than expected, keeping wage
23 growth high and forcing businesses to pass some of those costs on to

¹⁶ Payne, David, "Inflation hits 30-year High," Kiplinger, (Nov. 11, 2021).

¹⁷ Ibid.

¹⁸ Kennedy, Simon. "Goldman Now Sees Fed Hiking Rates in July as Inflation Lingers." Bloomberg.com, Bloomberg, 30 Oct. 2021, <https://www.bloomberg.com/news/articles/2021-10-30/goldman-now-sees-fed-hiking-rates-in-july-as-inflation-lingers>.

¹⁹ Liesman, Steve. "Investors Expect a Faster Pace for Fed Rate Hikes, CNBC Survey Shows." CNBC, CNBC, 2 Nov. 2021, <https://www.cnbc.com/2021/11/02/investors-expect-a-faster-pace-for-fed-rate-hikes-cnbc-survey-shows.html>.

1 consumers. So, inflation should remain higher than its 1.7% average over
2 the past ten years.²⁰

3 According to Kiplinger, the higher levels of inflation will likely result in the Federal
4 Reserve increasing the federal funds rate in 2022 instead of 2023 as originally
5 planned.²¹

6 **Q: What effect will inflation have on long-term interest rates?**

7 A: Inflation and the Federal Reserve's normalization of monetary policy will likely result in
8 increases in long-term interest rates. Specifically, inflation reduces the purchasing power
9 of the future interest payments an investor expects to receive over the duration of the bond.
10 This risk increases the longer the duration of the bond. As a result, if investors expect
11 increased levels of inflation, they will require higher yields to compensate for the increased
12 risk of inflation which means interest rates will increase.

13 **Q: What have equity analysts said about long-term government bond yields over the
14 near term?**

15 A: Several equity analysts have noted that they expect economic conditions to continue to
16 improve and thus the yields on long-term government bonds to continue to increase through
17 the end of 2022. As shown in Figure 3, according to six different equity analysts, the yield
18 on the 10-year Treasury Bond is expected to range from 1.75 percent to 2.50 percent in
19 2022 which is 17 to 92 basis points greater than the current 30-day average yield on the
20 10-year Treasury Bond as of November 30, 2021, of 1.58 percent. Specifically, Morgan

²⁰ Payne, David, "Inflation hits 30-year High," Kiplinger, November 11, 2021.

²¹ *Ibid.*

1 Stanley recently noted the following regarding the expectation for long-term government
2 bond yields in 2022:

3 Continued strong growth in 2022, alongside receding but above-target
4 inflation, keeps the Fed patient, yet gradually moving toward rate hikes, and
5 keeps Treasury yields moving higher.²²

6 **Figure 3: Equity Analysts Forecast of the 10-year Treasury Yield²³**

Bank	10-year U.S. Treasury Yield	
	30-day Average as of November 30, 2021	2022 Forecast
Barclays	1.58%	1.75%
Morgan Stanley	1.58%	2.10%
Goldman Sachs	1.58%	2.00%
JP Morgan	1.58%	2.10%
Wells Fargo Investment Institute	1.58%	2.00% - 2.50%
Amundi	1.58%	1.80% - 2.00%

7
8 **Q: Have you considered any additional indicators which may imply long-term interest**
9 **rates are expected to increase?**

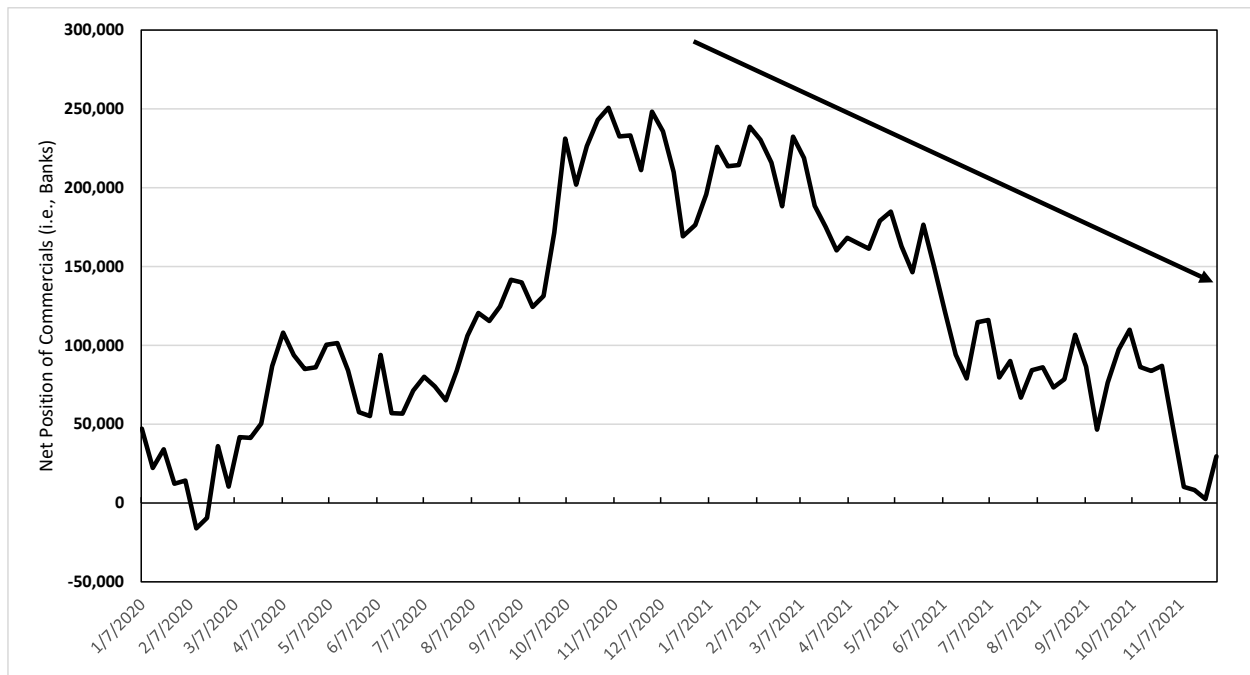
10 **A:** Yes, I have. I considered the net position of commercials (i.e., banks) in U.S. Treasury
11 Bond futures contracts as reported in the Commitment of Traders (“COT”) Report
12 produced by the Commodity Futures Trading Commission (“CFTC”). A net position is
13 defined as the total number of long positions in a futures contract minus the total number
14 of short positions in a futures contract. A long position means that an investor agrees to
15 purchase an asset in the future at a specified price today and therefore profits if the price
16 of the underlying asset increases. Conversely, short position is when an investor agrees to

²² “Factbox: Wall Street Forecasts for the U.S. Dollar and 10-Year Treasury Yield in 2022.” Reuters, Thomson Reuters, 18 Nov. 2021, <https://www.reuters.com/markets/us/wall-street-forecasts-us-dollar-10-year-treasury-yield-2022-2021-11-18/>.

²³ “Factbox: Wall Street Forecasts for the U.S. Dollar and 10-Year Treasury Yield in 2022.” Reuters, Thomson Reuters, 18 Nov. 2021, <https://www.reuters.com/markets/us/wall-street-forecasts-us-dollar-10-year-treasury-yield-2022-2021-11-18/>.

1 sell an asset at a time in the future at a specified price today and profits if the price of the
2 asset declines. Therefore, if banks are increasing the number of short positions and thus
3 have a declining net position, the banks are assuming that the price of the asset will decline.
4 As shown in Figure 4, the net position of banks in U.S. Treasury Bonds has been decreasing
5 since the end of 2020. Therefore, banks are forecasting a decrease in the price of long-
6 term government bonds and thus the yields (which are inversely related to the price) to
7 increase over the near-term.

1 **Figure 4: Commitment of Traders Report – Net Position of Commercials (i.e., Banks) in**
 2 **U.S. Treasury Bond Futures Contracts²⁴**



3
 4 **Q: Are utility share prices correlated to changes in the yields on long-term government**
 5 **bonds?**

6 **A:** Yes, interest rates and utility share prices are inversely correlated which means, for
 7 example, that an increase in interest rates will result in a decline in the share prices of
 8 utilities. For example, Goldman Sachs and Deutsche Bank recently examined the
 9 sensitivity of share prices of different industries to changes in interest rates over the past
 10 five years. Both Goldman Sachs and Deutsche Bank found that utilities had one of the
 11 strongest negative relationships with bond yields (i.e., increases in bond yields resulted in
 12 the decline of utility share prices).²⁵ Charles Schwab also recently noted the inverse

²⁴ Commitment of Traders Report, as of November 30, 2021 - <https://www.cftc.gov/MarketReports/CommitmentsofTraders/HistoricalCompressed/index.htm>

²⁵ Lee, Justina. "Wall Street Is Rethinking the Treasury Threat to Big Tech Stocks." Bloomberg.com, 11 Mar. 2021, www.bloomberg.com/news/articles/2021-03-11/wall-street-is-rethinking-the-treasury-threat-to-big-tech-stocks.

1 relationship between interest rates and utility share prices and concluded that the utility
2 sector tends to underperform during periods of economic growth when interest rates are
3 higher.²⁶

4 **Q: How do equity analysts expect the utilities sector to perform in an increasing interest**
5 **rate environment?**

6 A: Equity analysts project that utilities are expected to continue to underperform the broader
7 market as interest rates increase. For example, in a recent article, Barron's conducted its
8 Big Money poll of professional investors regarding the outlook for the next twelve months.
9 Approximately 60 percent of respondents projected the yield on the 10-year Treasury Bond
10 will be 2.00 percent or greater at the end of the next twelve months which is an increase
11 from the current 30-day average 10-year Treasury Bond yield as of November 30, 2021 of
12 1.58 percent.²⁷ Furthermore, the professional investors surveyed by Barron's selected the
13 utility sector as the sector which will perform the worst over the next twelve months
14 indicating they are projecting that utilities will underperform the broader market in 2022.
15 Other equity analysts concur with this conclusion. Fidelity recently recommended
16 underweighting the utility sector and noted that "[w]eak fundamentals and high valuations
17 could be headwinds for utilities and real estate, especially if rates increase."²⁸ In its 2022
18 Outlook, Well Fargo classified the utility sector as "most unfavorable" as economic growth
19 continues to rebound and interest rates increase.²⁹ Finally, Charles Schwab has classified

²⁶ Charles Schwab, Schwab Sector Views: Too Early for Defensive Positioning, August 19, 2021.

²⁷ Jasinski, Nicholas. Stocks Are Still the Place to Be, Our Exclusive Big Money Poll Finds. Barron's, 16 Oct. 2021, <https://www.barrons.com/articles/stock-market-covid-economy-outlook-51634312012?mod=hpsubnav&tesla=y>.

²⁸ Fidelity, "Q4 2021 sector scorecard," October 27, 2021.

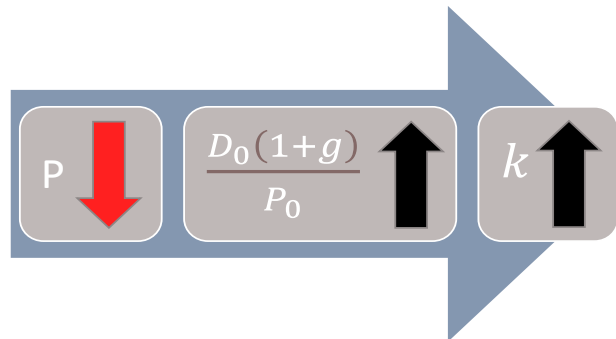
²⁹ Well Fargo Investment Institute, 2022 Outlook, December 2021.

1 the utilities sector overall as “Underperform,” noting negatives for the sector that include
2 “interest rates are expected to recover from recent decline” and “economic recovery makes
3 the sector less attractive, relative to other sectors”.³⁰

4 **Q: What is the significance of the inverse relationship between interest rates and utility
5 share prices in the current market?**

6 A: As discussed above, the economy is currently in the recovery phase of the business cycle,
7 which is characterized by improving economic growth, increasing inflation, and increasing
8 interest rates. If the utility sector underperforms over the near term as expected, and prices
9 of utility stocks decline, then the DCF model, which relies on historical averages of share
10 prices, is likely to understate the cost of equity. For example, Figure 5 below summarizes
11 the effect of a decline in share price on the dividend yield and thus the cost of equity
12 estimated by the Constant Growth DCF model.

13 **Figure 5: The Effect of a decline in Stock Prices on the Constant Growth DCF model**



14 A decline in stock prices will increase the dividend yields and thus the estimate of the ROE
15 produced by the Constant Growth DCF model. Therefore, this expected change in market
16 conditions supports the Commission giving greater consideration to the range of ROE
17 results produced by the mean-high DCF results since the mean DCF results would likely
18

³⁰ Charles Schwab, “Utilities Sector Rating: Underperform,” November 18, 2021.

1 understate the cost of equity during the period that the Company's rates will be in effect.
2 Moreover, prospective market conditions also warrant greater consideration of other ROE
3 estimation models such as the CAPM, ECAPM and Risk Premium, which may better
4 reflect expected market conditions. For example, two out of three inputs to the CAPM (*i.e.*,
5 the market risk premium and risk-free rate) are forward-looking.

6 **B. Conclusion**

7 **Q: What are your conclusions regarding the effect of current market conditions on the**
8 **cost of equity for the Company?**

9 A: Over the near-term, investors expect economic growth to continue to rebound and thus
10 inflation and interest rates to increase. Because the share prices of utilities are inversely
11 related to interest rates, an increase in long-term government bond yields will likely result
12 in a decline in utility share prices which is the reason a number of equity analysts expect
13 the utility sector to underperform over the near-term. The expected underperformance of
14 utilities means that DCF models which rely on recent historical share prices are likely
15 underestimating investors' required return over the period that rates will be in effect. This
16 change in market conditions also supports the use of other ROE estimation models such as
17 the CAPM, ECAPM, and Risk Premium which may better reflect expected market
18 conditions.

1 **V. PROXY GROUP SELECTION**

2 **Q: Please provide a brief profile of Evergy Missouri West.**

3 A: Evergy Missouri West is a wholly owned subsidiary of Evergy, Inc. The Company provides
4 regulated retail electric service to approximately 347,000 customers in Missouri.³¹ As of
5 December 31, 2020, the Company’s net utility electric plant was approximately \$2.8
6 billion.³² In addition, the Company had total electric revenues of \$805 million in 2020.³³
7 Evergy Missouri West is currently rated A-/Negative by Standard & Poor’s and
8 Baa2/Stable by Moody’s.³⁴

9 **Q: Why have you used a group of proxy companies to estimate the cost of equity for**
10 **Evergy Missouri West?**

11 A: In this proceeding, we focus on estimating the cost of equity for an electric utility company
12 that is not itself publicly traded. Because the cost of equity is a market-based concept and
13 because Evergy Missouri West’s operations do not make up the entirety of a publicly traded
14 entity, it is necessary to establish a group of companies that is both publicly traded and
15 comparable to the Company in certain fundamental business and financial respects to serve
16 as its “proxy” in the ROE estimation process.

17 Even if Evergy Missouri West was a publicly traded entity, it is possible that transitory
18 events could bias its market value over a given period. A significant benefit of using a
19 proxy group is that it moderates the effects of unusual events that may be associated with
20 any one company. The proxy companies used in my analyses all possess a set of operating

³¹ Evergy Missouri West, Inc., 2020 Annual Report to the Missouri Public Service Commission, at 3c.

³² *Id.*, at 110.

³³ *Id.*, at 300.

³⁴ Source: S&P Capital IQ Pro, (Nov. 21, 2021).

1 and risk characteristics that are substantially comparable to the Company, and thus provide
2 a reasonable basis to derive and estimate the appropriate ROE for Evergy Missouri West.

3 **Q: How did you select the companies included in your proxy group?**

4 A: I began with the group of 36 companies that Value Line classifies as Electric Utilities and
5 applied the following screening criteria to select companies that:

- 6 • Pay consistent quarterly cash dividends, because companies that do not pay a
7 dividend cannot be analyzed using the Constant Growth DCF model;
- 8 • Have investment grade long-term issuer ratings from S&P and/or Moody's;
- 9 • Are covered by at least two utility industry analysts;
- 10 • Have positive long-term earnings growth forecasts from at least two utility industry
11 equity analysts;
- 12 • Own regulated generation assets that are included in rate base;
- 13 • Have more than 5 percent of owned regulated generation capacity come from
14 regulated coal-fired power plants;
- 15 • Derive more than 40 percent of its megawatt-hour sales from its owned generation
16 facilities.
- 17 • Derive more than 60 percent of their total operating income from regulated
18 operations;
- 19 • Derive more than 60 percent of their total regulated operating income from
20 regulated electric operations; and
- 21 • Were not parties to a merger or transformative transaction during the analytical
22 periods relied on.

23 **Q: Did you include Evergy, Inc. in your analysis?**

24 A: No. In order to avoid the circular logic that otherwise would occur, it is my practice to
25 exclude the subject company, or its parent holding company, from the proxy group.

1 **Q: Did you exclude any other companies from the proxy group?**

2 A: Yes. Similar to the reason that I exclude transformative transactions; because the stock
3 price can be affected by one-time events, I also excluded Pinnacle West Capital
4 Corporation from the proxy group. The stock price of Pinnacle West Capital Corporation
5 decreased approximately 24 percent over a two-month period from October through
6 November 2021 resulting from a negative regulatory decision for its largest operating
7 company, Arizona Public Service Company. Therefore, I have excluded this company
8 from the proxy group.

9 **Q: What is the composition of your proxy group?**

10 A: The screening criteria discussed above are shown in Schedule AEB-2 and resulted in a
11 proxy group consisting of the companies shown in Figure 6 below.

1

Figure 6: Proxy Group

Company	Ticker
ALLETE, Inc.	ALE
Alliant Energy Corporation	LNT
Ameren Corporation	AEE
American Electric Power Company, Inc.	AEP
Avista Corporation	AVA
Duke Energy Corporation	DUK
Entergy Corporation	ETR
IDACORP, Inc.	IDA
MGE Energy, Inc.	MGEE
NextEra Energy, Inc.	NEE
NorthWestern Corporation	NWE
Otter Tail Corporation	OTTR
Portland General Electric Company	POR
Southern Company	SO
Xcel Energy Inc.	XEL

2

3 **VI. COST OF EQUITY ESTIMATION**

4 **Q: Please briefly discuss the ROE in the context of the regulated rate of return (“ROR”).**

5 A: The ROE is the cost rate applied to the equity capital in the ROR. The ROR for a regulated
6 utility is the weighted average cost of capital, in which the cost rates of the individual
7 sources of capital are weighted by their respective book values. While the costs of debt
8 and preferred stock can be directly observed, the cost of equity is market-based and,
9 therefore, must be estimated based on observable market data.

1 **Q: How is the required ROE determined?**

2 A: The required ROE is estimated by using one or more analytical techniques that rely on
3 market-based data to quantify investor expectations regarding equity returns, adjusted for
4 certain incremental costs and risks. Informed judgment is then applied to determine where
5 the company's cost of equity falls within the range of results. The key consideration in
6 determining the cost of equity is to ensure that the methodologies employed reasonably
7 reflect investors' views of the financial markets in general, as well as the subject company
8 (in the context of the proxy group), in particular.

9 **Q: What methods did you use to determine Evergy Missouri West's ROE?**

10 A: I considered the results of the Constant Growth DCF model, the CAPM, the ECAPM, and
11 a Bond Yield Plus Risk Premium analysis. As discussed in more detail below, a reasonable
12 ROE estimate appropriately considers alternative methodologies and the reasonableness of
13 their individual and collective results.

14 **A. Importance of Multiple Analytical Approaches**

15 **Q: Why is it important to use more than one analytical approach?**

16 A: Because the cost of equity is not directly observable, it must be estimated based on both
17 quantitative and qualitative information. When faced with the task of estimating the cost
18 of equity, analysts and investors are inclined to gather and evaluate as much relevant data
19 as reasonably can be analyzed. Several models have been developed to estimate the cost
20 of equity, and I use multiple approaches to estimate the cost of equity. As a practical
21 matter, however, all the models available for estimating the cost of equity are subject to
22 limiting assumptions or other methodological constraints. Consequently, many well-
23 regarded finance texts recommend using multiple approaches when estimating the cost of

1 equity. For example, Copeland, Koller, and Murrin³⁵ suggest using the CAPM and
2 Arbitrage Pricing Theory model, while Brigham and Gapenski³⁶ recommend the CAPM,
3 DCF, and Bond Yield Plus Risk Premium approaches.

4 **Q: Do current market conditions increase the importance of using more than one**
5 **analytical approach?**

6 A: Yes. Low interest rates and the effects of the investor “flight to quality” can be seen in
7 high utility share valuations, relative to historical levels and relative to the broader market.
8 Higher utility stock valuations produce lower dividend yields and result in lower cost of
9 equity estimates from a DCF analysis. Low interest rates also affect the CAPM in two
10 ways: (1) the risk-free rate is lower, and (2) because the market risk premium is a function
11 of interest rates (i.e., it is the return on the broad stock market less the risk-free interest
12 rate), the risk premium should move higher when interest rates are lower. Therefore, it is
13 important to use multiple analytical approaches to moderate the impact that the current low
14 interest rate environment is having on the ROE estimates for the proxy group and, where
15 possible, consider using projected market data in the models to estimate the return for the
16 forward-looking period.

17 **Q: Has the Commission recognized that it is important to consider the results of multiple**
18 **ROE estimation models?**

19 A: Yes. In its order for Spire Missouri in File Nos. GR-2017-0215 and GR-2017-0216, the
20 Commission authorized an ROE of 9.80 percent which the Commission noted was near the

³⁵ Tom Copeland, Tim Koller and Jack Murrin, Valuation: Measuring and Managing the Value of Companies, 3rd Ed. (New York: McKinsey & Company, Inc., 2000), at 214.

³⁶ Eugene Brigham, Louis Gapenski, Financial Management: Theory and Practice, 7th Ed. (Orlando: Dryden Press, 1994), at 341.

1 mid-point of the recommendations of the ROE witnesses, consistent with national average
2 authorized ROEs, and reflective of the growing economy and the expectation of increases
3 in interest rates.³⁷ Specifically, the Commission stated that:

4 [i]n order to set a fair rate of return for Spire, the Commission must
5 determine the weighted cost of each component of the utility's capital
6 structure. One component at issue in this case is the estimated cost of
7 common equity, or the return on equity. Based on the competent and
8 substantial evidence in the record, on its analysis of the expert testimony
9 offered by the parties, and on its balancing of the interests of the company's
10 ratepayers and shareholders, as fully explained in its findings of fact and
11 conclusions of law, the Commission finds that 9.8 percent is a fair and
12 reasonable return on equity for Spire Missouri. That rate is nearly the
13 midpoint of all the experts' recommendations and is consistent with the
14 national average, the growing economy, and the anticipated increasing
15 interest rates. The Commission finds that this rate of return will allow Spire
16 Missouri to compete in the capital market for the funds needed to maintain
17 its financial health.³⁸

18 Thus, the Commission has recognized the importance of considering: (1) the results of each
19 model presented in the rate case including the DCF, CAPM and Risk Premium analyses;
20 (2) capital market conditions since changes in market conditions can affect the model
21 results and; and (3) the returns awarded to comparable utilities in other jurisdictions across
22 the U.S.

23 **Q: Are you aware of any other regulatory commissions that have recognized the**
24 **importance of considering the results of multiple models?**

25 **A:** Yes, several regulatory commissions consider the results of multiple ROE estimation
26 methodologies such as the DCF, CAPM, ECAPM and Risk Premium in determining the
27 authorized ROE, including the Minnesota Public Utilities Commission ("Minnesota

³⁷ *In the Matter of Laclede Gas Company's Request to increase its Revenues for Gas Service*, File No. GR-2017-0215 and File No. GR-2017-0216, Report and Order (Feb. 21, 2018), at 34.

³⁸ *Ibid.*

1 PUC”)³⁹, the Michigan PSC⁴⁰, the Iowa Utilities Board (“IUB”)⁴¹, the Washington Utilities
2 and Transportation Commission (“Washington UTC”),⁴² and the New Jersey Board of
3 Public Utilities (“NJBPU”).⁴³ For example, the Washington UTC has repeatedly
4 emphasized that it “places value on each of the methodologies used to calculate the cost of
5 equity and does not find it appropriate to select a single method as being the most accurate
6 or instructive.”⁴⁴ The Washington UTC has also explained that “[f]inancial circumstances
7 are constantly shifting and changing, and we welcome a robust and diverse record of
8 evidence based on a variety of analytics and cost of capital methodologies.”⁴⁵
9 Additionally, in its recent order for DTE Gas Company (“DTE Gas”) in Case No. U-18999,
10 the Michigan PSC considered the results of each of the models presented by the ROE
11 witnesses which included the DCF, CAPM, ECAPM and Risk Premium in the
12 determination of the authorized ROE.⁴⁶ The Commission also considered authorized ROEs
13 in other states, increased volatility in capital markets and the company-specific business
14 risks of DTE Gas.

³⁹ Docket No. G011/GR-17-563, Findings of Fact, Conclusions and Order, at 27; Docket No. E015/GR-16-664, Findings of Fact, Conclusions and Order, at 60-61.

⁴⁰ Michigan Public Service Commission Order, DTE Gas Company, Case No. U-18999, at 45-47 (Sept. 13, 2018).

⁴¹ Iowa Utilities Board, Iowa-American Water Company, RPU-2016-0002, Final Decision and Order issued, at 35 (Feb. 27, 2017).

⁴² *Wash. Utils. & Transp. Comm’n v. PacifiCorp*, Docket UE-130043, Order 05, n. 89 (Dec. 4, 2013); *Wash. Utils. & Transp. Comm’n v. PacifiCorp*, Docket UE-100749, Order 06, ¶ 91 (March 25, 2011).

⁴³ NJBPU Docket No. ER12111052, OAL Docket No. PUC16310-12, Order Adopting Initial Decision with Modifications and Clarifications, at 71 (March 18, 2015).

⁴⁴ *Wash. Utils. & Transp. Comm’n v. PacifiCorp*, Docket UE-130043, Order 05, n. 89 (Dec. 4, 2013).

⁴⁵ *Wash. Utils. & Transp. Comm’n v. PacifiCorp*, Docket UE-100749, Order 06, ¶ 91 (March 25, 2011).

⁴⁶ Michigan Public Service Commission Order, DTE Gas Company, Case No. U-18999, at 45-47 (Sept. 13, 2018).

1 **Q: What are your conclusions about the results of the DCF and CAPM models?**

2 A: Recent market data that is used as the basis for the assumptions for both models have been
3 affected by market conditions. As a result, relying exclusively on historical assumptions
4 in these models, without considering whether these assumptions are consistent with
5 investors' future expectations, will underestimate the cost of equity that investors would
6 require over the period that the rates in this case are to be in effect. In this instance, relying
7 on the historically low dividend yields that are not expected to continue over the period
8 that the new rates will be in effect will underestimate the ROE for Evergy Missouri West.
9 Furthermore, as discussed in Section IV above, long-term interest rates have increased
10 since August 2020 and this trend is expected to continue over the near-term as the economy
11 enters the recovery phase of the business cycle. Therefore, the use of current averages of
12 Treasury bond yields as the estimate of the risk-free rate in the CAPM is not appropriate
13 since recent market conditions are not expected to continue over the long-term. Instead,
14 analysts should rely on projected yields of Treasury Bonds in the CAPM. The projected
15 Treasury Bond yields results in CAPM estimates that are more reflective of the market
16 conditions that investors expect during the period that the Company's rates will be in effect.

17 **B. Constant Growth DCF Model**

18 **Q: Please describe the DCF approach.**

19 A: The DCF approach is based on the theory that a stock's current price represents the present
20 value of all expected future cash flows. In its most general form, the DCF model is
21 expressed as follows:

22
$$P_0 = \frac{D_1}{(1+k)} + \frac{D_2}{(1+k)^2} + \dots + \frac{D_\infty}{(1+k)^\infty} \quad [1]$$

1 Where P_0 represents the current stock price, $D_1 \dots D_\infty$ are all expected future dividends,
2 and k is the discount rate, or required ROE. Equation [1] is a standard present value
3 calculation that can be simplified and rearranged into the following form:

$$4 \quad k = \frac{D_0(1+g)}{P_0} + g \quad [2]$$

5 Equation [2] is often referred to as the Constant Growth DCF model in which the first term
6 is the expected dividend yield and the second term is the expected long-term growth rate.

7 **Q: What assumptions are required for the Constant Growth DCF model?**

8 A: The Constant Growth DCF model requires the following four assumptions: (1) a constant
9 growth rate for earnings and dividends; (2) a stable dividend payout ratio; (3) a constant
10 price-to-earnings ratio; and (4) a discount rate greater than the expected growth rate. To
11 the extent that any of these assumptions are violated, considered judgment and/or specific
12 adjustments should be applied to the results.

13 **Q: What market data did you use to calculate the dividend yield in your Constant
14 Growth DCF model?**

15 A: The dividend yield in my Constant Growth DCF model is based on the proxy companies'
16 current annualized dividend and average closing stock prices over the 30-, 90-, and 180-
17 trading days ended September 30, 2021.

18 **Q: Why did you use 30-, 90-, and 180-day averaging periods?**

19 A: In my Constant Growth DCF model, I use an average of recent trading days to calculate
20 the term P_0 in the DCF model to ensure that the ROE is not skewed by anomalous events
21 that may affect stock prices on any given trading day. The averaging period should also
22 be reasonably representative of expected capital market conditions over the long term.

1 However, the averaging periods that I use rely on historical data that are not consistent with
2 the forward-looking market expectations. Therefore, the results of my Constant Growth
3 DCF model using historical data may underestimate the forward-looking cost of equity.
4 As a result, I place more weight on the mean to mean-high results produced by my Constant
5 Growth DCF model.

6 **Q: Did you make any adjustments to the dividend yield to account for periodic growth**
7 **in dividends?**

8 A: Yes, I did. Because utility companies tend to increase their quarterly dividends at different
9 times throughout the year, it is reasonable to assume that dividend increases will be evenly
10 distributed over calendar quarters. Given that assumption, it is reasonable to apply one-
11 half of the expected annual dividend growth rate for purposes of calculating the expected
12 dividend yield component of the DCF model. This adjustment ensures that the expected
13 first-year dividend yield is, on average, representative of the coming twelve-month period,
14 and does not overstate the aggregated dividends to be paid during that time.

15 **Q: Why is it important to select appropriate measures of long-term growth in applying**
16 **the DCF model?**

17 A: In its Constant Growth form, the DCF model (*i.e.*, Equation [2]) assumes a single growth
18 estimate in perpetuity. To reduce the long-term growth rate to a single measure, one must
19 assume that the payout ratio remains constant and that earnings per share, dividends per
20 share and book value per share all grow at the same constant rate. Over the long run,
21 however, dividend growth can only be sustained by earnings growth. Therefore, it is
22 important to incorporate a variety of sources of long-term earnings growth rates into the
23 Constant Growth DCF model.

1 **Q: Which sources of long-term earnings growth rates did you use?**

2 A: My Constant Growth DCF model incorporates three sources of long-term earnings growth
3 rates: (1) Zacks Investment Research; (2) Yahoo! Finance; and (3) Value Line Investment
4 Survey.

5 **Q: How did you calculate the range of results for the Constant Growth DCF Models?**

6 A: I calculated the low result for my DCF model using the minimum growth rate (*i.e.*, the
7 lowest of the Value Line, Yahoo! Finance, and Zacks earnings growth rates) for each of
8 the proxy group companies. Thus, the low result reflects the minimum DCF result for the
9 proxy group. I used a similar approach to calculate the high results, using the highest
10 growth rate for each proxy group company. The mean results were calculated using the
11 average growth rates from all sources.

12 **Q: Did you review the DCF results for individual companies in your proxy group?**

13 A: Yes, I did. It is important to review the DCF results of the individual companies included
14 in the proxy to ensure that the DCF results of each company provide a sufficient return
15 increment above the long-term debt costs to compensate investors for the added risk of an
16 equity investment.

17 **Q: How did you determine the low-end threshold that would be used to evaluate the DCF
18 results for the individual companies in your proxy group?**

19 A: The average credit rating for the companies in my proxy group is BBB+ from S&P and
20 Baa1 from Moody's. The average yield on Moody's Baa-rated utility bonds for the 30
21 trading days ending September 30, 2021 was 3.19 percent.⁴⁷ Therefore, for example, a 7.00

⁴⁷ The yield on the Moody's Baa-rated utility bonds was obtained from Bloomberg Professional (Oct. 5,2021).

1 percent DCF result would only provide a risk premium of 381 basis points above Baa-rated
2 utility bonds. As a result, I have determined that a Constant Growth DCF result lower than
3 7.00 percent would not provide equity investors a sufficient risk premium above long-term
4 debt costs.

5 **Q: How did you address the DCF results for individual companies in your proxy group**
6 **that were below 7 percent?**

7 A: I developed two approaches to account for the DCF results for individual companies in my
8 proxy group that were below 7 percent. In the first approach, I excluded the DCF results
9 that were below 7 percent and then calculated the mean DCF result for the proxy group.
10 Since the mean can be affected by outlier results, it is important to exclude the individual
11 results for companies that would not provide a sufficient return requirement above long-
12 term debt costs. In the second approach, I relied on the median DCF result for the proxy
13 group as opposed to the mean and did not exclude any DCF results for individual
14 companies. In general, the median is not affected to a large degree by the presence of
15 outliers and thus can be applied when it is determined that a data may include outliers.

16 **Q: What were the results of your Constant Growth DCF analyses?**

17 A: Figure 7 (see also Schedule AEB-3) summarizes the results of my DCF analyses. As shown
18 in Figure 7, the median and mean DCF results range from 9.36 percent to 9.58 percent, and
19 the median high and mean high results are in the range of 10.03 percent to 10.13 percent.
20 While I also summarize the low DCF results, given the expected underperformance of
21 utility stocks and thus the likelihood that the DCF model is understating the cost of equity,
22 I do not believe it is appropriate to consider the low DCF results at this time.

1 **Figure 7: Constant Growth Discounted Cash Flow Results**

Constant Growth DCF - Median			
	Median Low	Median	Median High
30-Day Average	8.83%	9.58%	10.03%
90-Day Average	8.78%	9.36%	10.03%
180-Day Average	8.81%	9.38%	10.10%
Constant Growth DCF - Average w/ Exclusions			
	Mean Low	Mean	Mean High
30-Day Average	8.66%	9.49%	10.03%
90-Day Average	8.67%	9.50%	10.05%
180-Day Average	8.89%	9.58%	10.13%

2
3 **Q: What are your conclusions about the results of the DCF models?**

4 A: As discussed previously, one primary assumption of the Constant Growth DCF model is a
5 constant P/E ratio. That assumption is heavily influenced by the market price of utility
6 stocks. Since utility stocks are expected to underperform the broader market over the near-
7 term as interest rates increases, it is important to consider the results of the DCF models
8 with caution. This means that the results of the current DCF models are below where they
9 would otherwise be under more normal market conditions. Therefore, while I have given
10 weight to the results of the Constant Growth DCF model, my recommendation also gives
11 weight to the results of other ROE estimation models.

12 **C. CAPM Analysis**

13 **Q: Please briefly describe the CAPM.**

14 A: The CAPM is a risk premium approach that estimates the cost of equity for a given security
15 as a function of a risk-free return plus a risk premium to compensate investors for the non-
16 diversifiable, systematic risk of that security. Systematic risk is the risk inherent in the
17 entire market or market segment—which cannot be diversified away using a portfolio of

1 assets. Unsystematic risk is the risk of a specific company that can, theoretically, be
2 mitigated through portfolio diversification.

3 The CAPM is defined by four components, each of which must theoretically be a forward-
4 looking estimate:

$$5 \quad K_e = r_f + \beta(r_m - r_f) \quad [3]$$

6 Where:

7 K_e = the required market ROE;

8 β = Beta coefficient of an individual security;

9 r_f = the risk-free rate of return; and

10 r_m = the required return on the market.

11 In this specification, the term $(r_m - r_f)$ represents the market risk premium. According to
12 the theory underlying the CAPM, because unsystematic risk can be diversified away,
13 investors should only be concerned with systematic or non-diversifiable risk. Systematic
14 risk is measured by Beta. Beta is a measure of the volatility of a security as compared to
15 the market as a whole. Beta is defined as:

$$16 \quad \beta = \frac{\text{Covariance}(r_e, r_m)}{\text{Variance}(r_m)} \quad [4]$$

17 The variance of the market return (i.e., Variance (r_m)) is a measure of the uncertainty of
18 the general market, and the covariance between the return on a specific security and the
19 general market (i.e., Covariance (r_e, r_m)) reflects the extent to which the return on that
20 security will respond to a given change in the general market return. Thus, Beta represents
21 the risk of the security relative to the general market.

1 **Q: What risk-free rate did you use in your CAPM analysis?**

2 A: I relied on three sources for my estimate of the risk-free rate: (1) the current 30-day average
3 yield on 30-year U.S. Treasury bonds, which is 1.93 percent;⁴⁸ (2) the average projected
4 30-year U.S. Treasury bond yield for the first quarter of 2022 through the first quarter of
5 2023, which is 2.50 percent;⁴⁹ and (3) the average projected 30-year U.S. Treasury bond
6 yield for 2023 through 2027, which is 3.50 percent.⁵⁰

7 **Q: Would you place more weight on one of these scenarios?**

8 A: Yes. Based on current market conditions, I place more weight on the results of the
9 projected yields on the 30-year Treasury bonds. As discussed previously, the estimation
10 of the cost of equity in this case should be forward-looking because it is the return that
11 investors would receive over the future rate period. Therefore, the inputs and assumptions
12 used in the CAPM analysis should reflect the expectations of the market at that time. While
13 I have included the results of a CAPM analysis that relies on the current average risk-free
14 rate, this analysis fails to take into consideration the effect of the market's expectations for
15 interest rate increases on the cost of equity.

16 **Q: What Beta coefficients did you use in your CAPM analysis?**

17 A: As shown on Schedule AEB-4, I used the Beta coefficients for the proxy group companies
18 as reported by Bloomberg and Value Line. The Beta coefficients reported by Bloomberg
19 were calculated using ten years of weekly returns relative to the S&P 500 Index. Value

⁴⁸ Bloomberg Professional as of September 30, 2021.

⁴⁹ Blue Chip Financial Forecasts, Vol. 40, No. 10, at 2 (Oct. 1, 2021).

⁵⁰ Blue Chip Financial Forecasts, Vol. 40, No. 6, at 14 (June 1, 2021).

1 Line's calculation is based on five years of weekly returns relative to the New York Stock
2 Exchange Composite Index.

3 Additionally, as shown in Schedule AEB-4, I also considered an additional CAPM analysis
4 which relies on the long-term average utility Beta coefficient for the companies in my
5 proxy group. As shown in Schedule AEB-5, the long-term average utility Beta coefficient
6 was calculated as an average of the Value Line Beta coefficients for the companies in my
7 proxy group from 2011 through 2020.

8 **Q: How did you estimate the market risk premium in the CAPM?**

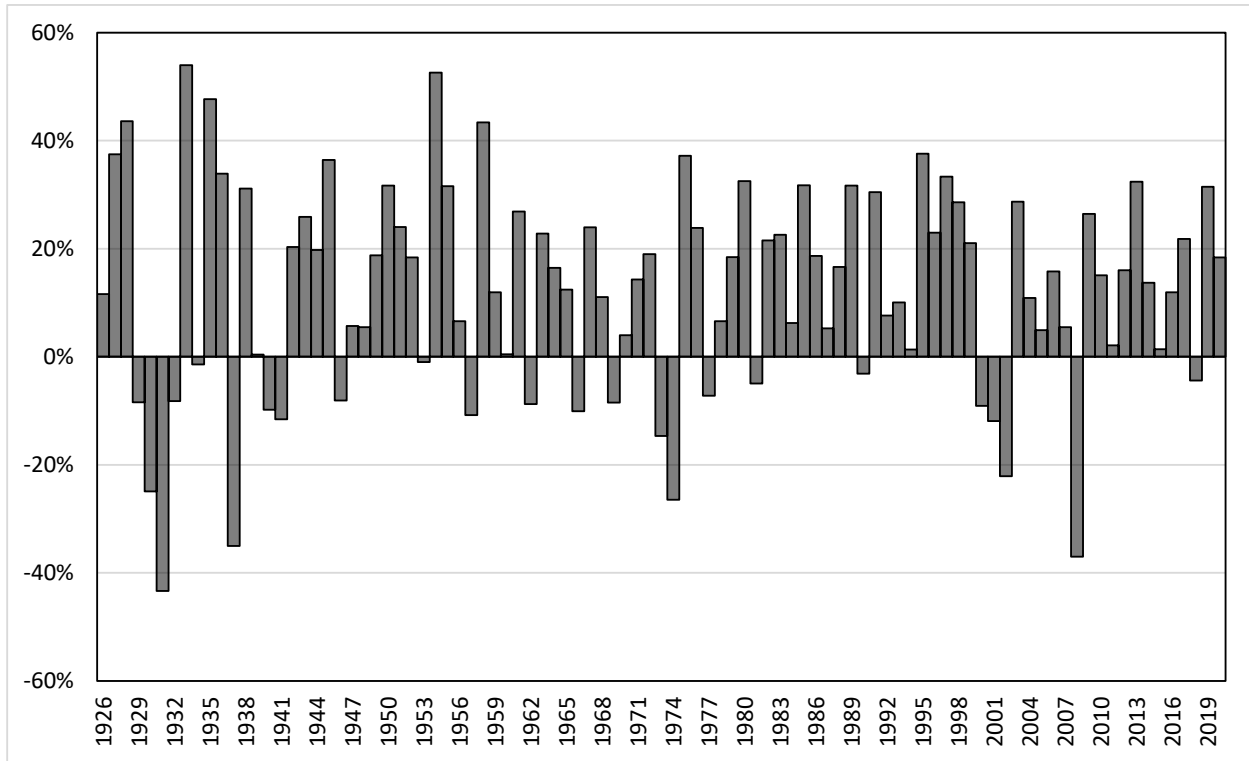
9 A: I estimated the Market Risk Premium ("MRP") as the difference between the implied
10 expected equity market return and the risk-free rate. As shown in Schedule AEB-6, the
11 expected return on the S&P 500 Index is calculated using the Constant Growth DCF model
12 discussed earlier in my testimony for the companies in the S&P 500 Index. In my
13 calculation of the market return, I included companies in the S&P 500 that: 1) had either a
14 dividend yield or Value Line long-term earnings projections; and 2) had a Value Line long-
15 term earnings growth rate that was greater than 0 percent and less than or equal to 20
16 percent. Based on an estimated market capitalization-weighted dividend yield of 1.56
17 percent and a weighted long-term growth rate of 11.29 percent, the estimated required
18 market return for the S&P 500 Index is 12.94 percent.

19 **Q: How does the current expected market return of 12.94 percent compare to observed
20 historical market returns?**

21 A: Given the range of annual equity returns that have been observed over the past century
22 (shown in Figure 8), a current expected return of 12.94 percent is not unreasonable. In 49

1 out of the past 95 years (or roughly 52 percent of observations), the realized equity return
2 was at least 12.94 percent or greater.

3 **Figure 8: Realized U.S. equity market returns (1926-2020)** ⁵¹



4
5 **Q: Did you consider another form of the CAPM in your analysis?**

6 A: Yes. I have also considered the results of an ECAPM or alternatively referred to as the
7 Zero-Beta CAPM⁵² in estimating the cost of equity for Evergy Missouri West. The
8 ECAPM calculates the product of the adjusted Beta coefficient and the market risk
9 premium and applies a weight of 75.00 percent to that result. The model then applies a
10 25.00 percent weight to the market risk premium, without any effect from the Beta

⁵¹ Depicts total annual returns on large company stocks, as reported in the 2021 Duff and Phelps SBBI Yearbook.
⁵² See e.g., Roger A. Morin, *New Regulatory Finance*, at 189, Public Utilities Reports, Inc. (2006).

1 coefficient. The results of the two calculations are summed, along with the risk-free rate,
2 to produce the ECAPM result, as noted in Equation [5] below:

$$3 \quad k_e = r_f + 0.75\beta(r_m - r_f) + 0.25(r_m - r_f) \quad [5]$$

4 Where:

5 k_e = the required market ROE;

6 β = Adjusted Beta coefficient of an individual security;

7 r_f = the risk-free rate of return; and

8 r_m = the required return on the market as a whole.

9 In essence, the Empirical form of the CAPM addresses the tendency of the “traditional”
10 CAPM to underestimate the cost of equity for companies with low Beta coefficients such
11 as regulated utilities. In that regard, the ECAPM is not redundant to the use of adjusted
12 Betas; rather, it recognizes the results of academic research indicating that the risk-return
13 relationship is different (in essence, flatter) than estimated by the CAPM, and that the
14 CAPM underestimates the “alpha,” or the constant return term.⁵³

15 As with the CAPM, my application of the ECAPM uses the forward-looking market risk
16 premium estimates, the three yields on 30-year Treasury securities noted earlier as the risk-
17 free rate, and the Bloomberg, Value Line, and long-term average Beta coefficients.

⁵³ *Id.*, at 191.

1 **Q: What are the results of your CAPM analyses?**

2 A: As shown in Figure 9 (see also Schedule AEB-4), my traditional CAPM analysis produces
3 a range of returns from 9.60 percent to 11.80 percent. The ECAPM analysis results range
4 from 10.43 percent to 12.09 percent.

5 **Figure 9: CAPM Results**

	Current Risk-Free Rate (1.93%)	Q1 2022 – Q1 2023 Projected Risk-Free Rate (2.50%)	2023-2027 Projected Risk-Free Rate (3.50%)
CAPM			
Value Line Beta	11.62%	11.68%	11.80%
Bloomberg Beta	10.76%	10.87%	11.07%
Long-term Avg. Beta	9.60%	9.77%	10.08%
ECAPM			
Value Line Beta	11.95%	12.00%	12.09%
Bloomberg Beta	11.30%	11.39%	11.53%
Long-term Avg. Beta	10.43%	10.56%	10.79%

6

7 **D. Bond Yield Plus Risk Premium Analysis**

8 **Q: Please describe the Bond Yield Plus Risk Premium approach.**

9 A: In general terms, this approach is based on the fundamental principle that equity investors
10 bear the residual risk associated with equity ownership and therefore require a premium
11 over the return they would have earned as a bondholder. That is, because returns to equity
12 holders have greater risk than returns to bondholders, equity investors must be
13 compensated to bear that risk. Risk premium approaches, therefore, estimate the cost of
14 equity as the sum of the equity risk premium and the yield on a particular class of bonds.
15 In my analysis, I used actual authorized returns for electric utility companies as the
16 historical measure of the cost of equity to determine the risk premium.

1 **Q: Are there other considerations that should be addressed in conducting this analysis?**

2 A: Yes, there are. It is important to recognize both academic literature and market evidence
3 indicating that the equity risk premium (as used in this approach) is inversely related to the
4 level of interest rates. That is, as interest rates increase, the equity risk premium decreases,
5 and vice versa. Consequently, it is important to develop an analysis that: (1) reflects the
6 inverse relationship between interest rates and the equity risk premium; and (2) relies on
7 recent and expected market conditions. Such an analysis can be developed based on a
8 regression of the risk premium as a function of U.S. Treasury bond yields. If we let
9 authorized ROEs for electric utilities serve as the measure of required equity returns and
10 define the yield on the long-term U.S. Treasury bond as the relevant measure of interest
11 rates, the risk premium simply would be the difference between those two points.⁵⁴

12 **Q: Is the Bond Yield Plus Risk Premium analysis relevant to investors?**

13 A: Yes, it is. Investors are aware of ROE awards in other jurisdictions, and they consider
14 those awards as a benchmark for a reasonable level of equity returns for utilities of
15 comparable risk operating in other jurisdictions. Because my Bond Yield Plus Risk
16 Premium analysis is based on authorized ROEs for utility companies relative to
17 corresponding Treasury yields, it provides relevant information to assess the return
18 expectations of investors.

⁵⁴ See S. Keith Berry, Interest Rate Risk and Utility Risk Premia during 1982-93, Managerial and Decision Economics, Vol. 19, No. 2 (March, 1998), in which the author used a methodology similar to the regression approach described below, including using allowed ROEs as the relevant data source, and came to similar conclusions regarding the inverse relationship between risk premia and interest rates. See also Robert S. Harris, Using Analysts' Growth Forecasts to Estimate Shareholders Required Rates of Return, at 66, Financial Management, (Spring 1986).

1 **Q: What did your Bond Yield Plus Risk Premium analysis reveal?**

2 A: As shown in Figure 10 below, from 1992 through September 2021, there was a strong
3 negative relationship between risk premia and interest rates. To estimate that relationship,
4 I conducted a regression analysis using the following equation:

$$RP = a + b(T) \text{ [6]}$$

6 Where:

7 RP = Risk Premium (difference between allowed ROEs and the yield on 30-year U.S.
8 Treasury bonds)

9 a = intercept term

10 b = slope term

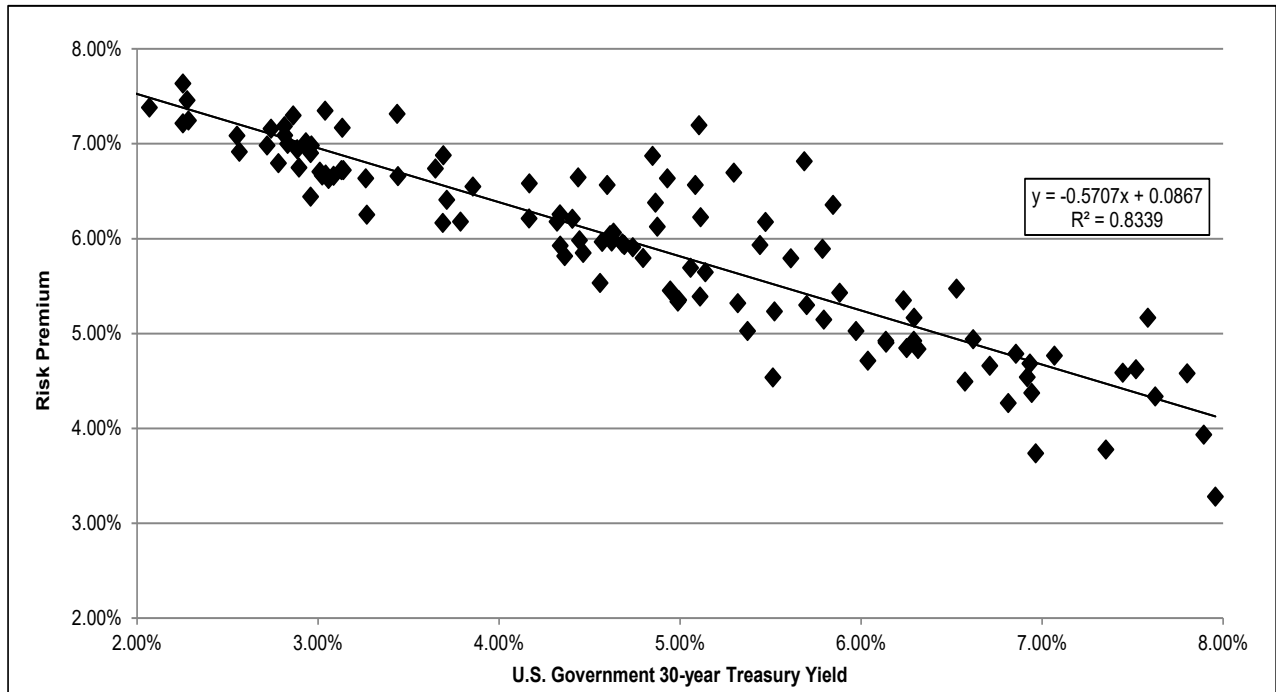
11 T = 30-year U.S. Treasury bond yield

12 Data regarding allowed ROEs were derived from 666 vertically integrated electric utility
13 rate cases from 1992 through September 2021 as reported by Regulatory Research
14 Associates (“RRA”).⁵⁵ This equation’s coefficients were statistically significant at the
15 99.00 percent level.

⁵⁵ My analysis began with a total of 1,321 electric utility cases, which were screened to eliminate limited issue rider cases, transmission cases, distribution only cases, and cases that did not specify an authorized ROE. After applying those screening criteria, the analysis was based on data for 666 cases.

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Figure 10: Risk Premium Results



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As shown on Schedule AEB-7, based on the current 30-day average of the 30-year U.S. Treasury bond yield (i.e., 1.93 percent), the risk premium would be 7.57 percent, resulting in an estimated ROE of 9.49 percent. Based on the near-term (Q1 2022 – Q1 2023) projections of the 30-year U.S. Treasury bond yield (i.e., 2.50 percent), the risk premium would be 7.24 percent, resulting in an estimated ROE of 9.74 percent. Based on longer-term (2023 – 2027) projections of the 30-year U.S. Treasury bond yield (i.e., 3.50 percent), the risk premium would be 6.67 percent, resulting in an estimated ROE of 10.17 percent.

Q: How did the results of the Bond Yield Risk Premium inform your recommended ROE for Evergy Missouri West?

A: I have considered the results of the Bond Yield Risk Premium analysis in setting my recommended ROE for Evergy Missouri West. As noted above, investors consider the ROE award of a company when assessing the risk of that company as compared to utilities of comparable risk operating in other jurisdictions. The Risk Premium analysis considers

1 this comparison by estimating the return expectations of investors based on the current and
2 past ROE awards of electric utilities across the U.S.

3 **VII. REGULATORY AND BUSINESS RISKS**

4 **Q: Do the DCF, CAPM and ECAPM results for the proxy group, taken alone, provide**
5 **an appropriate estimate of the cost of equity for Evergy Missouri West?**

6 A: No. These results provide only a range of the appropriate estimate of the Company's cost
7 of equity. There are several additional factors that must be taken into consideration when
8 determining where the Company's cost of equity falls within the range of results. These
9 factors, which are discussed below, should be considered with respect to their overall effect
10 on the Company's risk profile.

11 **A. Capital Expenditures, Plant-in-Service Account and Renewable Energy**

12 **Standard Rate Adjustment Mechanism**

13 **Q: Please summarize the Company's capital expenditure requirements.**

14 A: The Company's current projections for 2022 through 2026 include approximately \$2.18
15 billion in capital investments for the period.⁵⁶ Based on the Company's net utility plant of
16 approximately \$2.81 billion as of December 31, 2020⁵⁷, the \$2.18 billion of anticipated
17 capital expenditures are approximately 77.55 percent of Evergy Missouri West's net utility
18 plant as of December 31, 2020.

⁵⁶ Data provided by Evergy Missouri West.

⁵⁷ *Ibid.*

1 **Q: How is the Company’s risk profile affected by its substantial capital expenditure**
2 **requirements?**

3 A: As with any utility faced with substantial capital expenditure requirements, the Company’s
4 risk profile may be adversely affected in two significant and related ways: (1) the
5 heightened level of investment increases the risk of under-recovery or delayed recovery of
6 the invested capital; and (2) an inadequate return would put downward pressure on key
7 credit metrics.

8 **Q: Do credit rating agencies recognize the risks associated with elevated levels of capital**
9 **expenditures?**

10 A: Yes, they do. From a credit perspective, the additional pressure on cash flows associated
11 with high levels of capital expenditures exerts corresponding pressure on credit metrics
12 and, therefore, credit ratings. To that point, S&P explains the importance of regulatory
13 support for a significant amount of capital projects:

14 When applicable, a jurisdiction’s willingness to support large capital
15 projects with cash during construction is an important aspect of our analysis.
16 This is especially true when the project represents a major addition to rate
17 base and entails long lead times and technological risks that make it
18 susceptible to construction delays. Broad support for all capital spending is
19 the most credit-sustaining. Support for only specific types of capital
20 spending, such as specific environmental projects or system integrity plans,
21 is less so, but still favorable for creditors. Allowance of a cash return on
22 construction work-in-progress or similar ratemaking methods historically
23 were extraordinary measures for use in unusual circumstances, but when
24 construction costs are rising, cash flow support could be crucial to maintain
25 credit quality through the spending program. Even more favorable are those
26 jurisdictions that present an opportunity for a higher return on capital
27 projects as an incentive to investors.⁵⁸

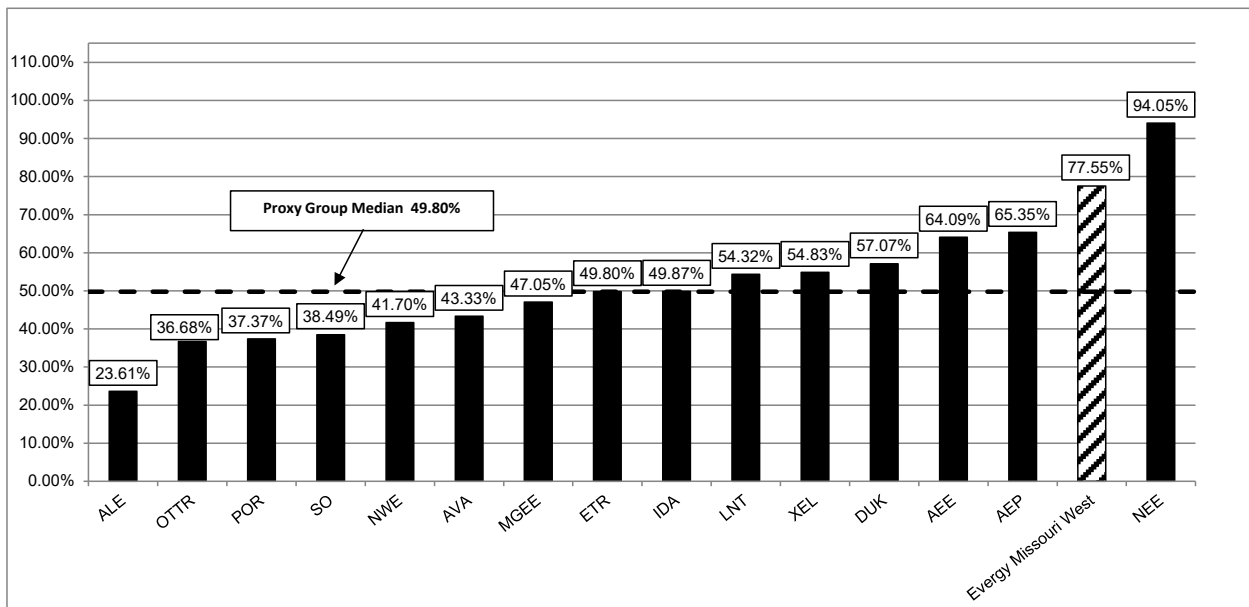
⁵⁸ S&P Global Ratings, “Assessing U.S. Investor-Owned Utility Regulatory Environments,” at 7 (Aug. 10, 2016).

Therefore, to the extent that Evergy Missouri West’s rates do not continue to permit the recovery its capital investments on a regular basis, the Company would face increased recovery risk and thus increased pressure on its credit metrics.

Q: How do Evergy Missouri West’s capital expenditure requirements compare to those of the proxy group companies?

A: As shown in Schedule AEB-8, I calculated the ratio of expected capital expenditures to net utility plant for Evergy Missouri West and each of the companies in the proxy group by dividing each company’s projected capital expenditures for the period from 2022-2026 by its total net utility plant as of December 31, 2020. As shown in Schedule AEB-8 (see also Figure 11 below), Evergy Missouri West’s ratio of capital expenditures as a percentage of net utility plant is 77.55 percent, which is approximately 56 percent higher than the median for the proxy group companies of 49.80 percent. This result indicates a risk level for Evergy Missouri West that is greater than the proxy group companies.

Figure 11: Comparison of Capital Expenditures – Proxy Group Companies



15

16

1 **Q: Does Evergy Missouri West have cost recovery mechanisms in place to recover the**
2 **costs associated with its capital expenditures plan between rate cases?**

3 A: Yes. Evergy Missouri West has implemented Plant-In Service Accounting (“PISA”) which
4 was established in 2018 when Senate Bill 564 became law and provides for the deferral of
5 85 percent of the depreciation and return on capital investment between rate cases.
6 Specifically, Senate Bill 564 provides that utilities who elect to use PISA shall:

7 [D]efer to a regulatory asset eight-five percent of all depreciation expense
8 and return associated with all qualifying electric plan recorded to plant-in-
9 service on the utility’s books... In each general rate proceeding concluded
10 after the effective date of this section, the balance of the regulatory asset as
11 of the rate base cutoff date shall be included in the electrical corporation’s
12 rate base without any offset, reduction, or adjustment based upon
13 consideration of any other factor...⁵⁹

14 Section 393.1400 of the Missouri Revised Statutes provides that companies electing the
15 use of PISA are required to submit a five-year capital investment plan setting forth the
16 categories of capital expenditures that will be pursued. This statute limits the capital
17 expenditures under PISA to certain types of investments (excluding new coal-fired, nuclear
18 and natural gas units), and requires 25 percent of the plan to be grid modernization
19 investment. The statute also establishes an expiration date on the deferrals of December
20 31, 2023, after which time regulatory approval for continuance through December 31,
21 2028, is required.

22 **Q: Does the implementation of PISA reduce Evergy Missouri West’s cost of equity?**

23 A: No, it does not. It is important to recognize that while the PISA has provided for some cost
24 recovery, there is a cap on the compound annual growth in rates of 3 percent as compared

⁵⁹ See Section 393.1400.2(1) and related provisions of the Missouri Revised Statutes.

1 to what rates were as of December 6, 2018 through the end of 2023 (and through 2028 but
2 only if PISA treatment is extended), which could limit the recovery of capital through the
3 PISA on a forward-looking basis. Further, it is important to recognize that the estimation
4 of the cost of equity includes a comparative analysis of the risks and returns of the subject
5 company and the proxy group of publicly traded utilities that are relied on in the ROE
6 estimation models, including their utility operating subsidiaries. Therefore, the threshold
7 question is not whether PISA reduces the risk of Evergy Missouri West, but rather, is
8 Evergy Missouri West’s risk reduced below that of the proxy group.

9 As shown in Schedule AEB-9, there are a number of cost recovery mechanisms in place
10 for the proxy companies, including forecasted test year, year-end rate base, revenue
11 decoupling and/or formula-based rates, capital cost recovery mechanisms, fuel/purchased
12 power mechanisms, and/or construction work in progress (“CWIP”) in rate base. Many of
13 these mechanisms are not available to Evergy Missouri West. Thus, the use of PISA does
14 not reduce the Company’s regulatory risk, relative to its peers. Rather, the implementation
15 of PISA moves the Company closer to the risk profile of the operating utilities of the proxy
16 group companies. Notably, Missouri law prohibits any charge that is based on the costs of
17 construction in progress on any existing or new facility, or any other cost associated with
18 any property before it is fully operational, and used for service.⁶⁰ By contrast, the CWIP
19 mechanism eliminates regulatory lag for many of the proxy companies.

⁶⁰ Missouri Statute Section 393.135.

1 **Q: Does the Company have any other cost recovery mechanisms?**

2 A: Yes. The Company also has the Renewable Energy Standard rate adjustment mechanism
3 (“RESRAM”). The RESRAM enables the Company to recover between rate cases the
4 costs relating to compliance with Missouri’s renewable energy standard, including
5 investments in wind generation and other renewables.⁶¹ Costs recovered through the
6 RESRAM are subject to prudence review.⁶²

7 **Q: How does PISA and RESRAM compare with the capital investment trackers that**
8 **have been implemented by the proxy companies?**

9 A: As shown in Schedule AEB-9, 40 out of 80 (or approximately 50 percent) of the operating
10 companies held by the proxy group recover costs through some form of capital tracking
11 mechanisms and approximately 67.50 percent of the proxy group can earn a return on
12 CWIP. However, as discussed previously, Evergy Missouri West’s capital cost recovery
13 mechanism currently expires in 2023, and even if extended, permanently expires in 2028,
14 and remains available only so long as Evergy Missouri West's overall rates do not escalate
15 (as compared to 2017 levels) at a rate in excess of 3 percent compounding annually.
16 Furthermore, if Evergy Missouri West were to exceed the rate cap, the Company would
17 lose recovery of the investments above the cap.

18 **Q: Is regulatory lag eliminated by the PISA and RESRAM mechanisms?**

19 A: Not entirely. As noted previously, PISA is applied to only 85 percent of the depreciation
20 and return for certain qualified investment. While it does allow deferral or return on 85%
21 of the eligible investment, the utility's net income is negatively impacted between rate cases

⁶¹ Missouri Statute Section 393.1030.2(4).

⁶² Missouri Code of State Regulations Section 20 CSR 4240-20.100(6).

1 because the equity portion of that return cannot be included in the utility's reported
2 earnings. Moreover, the remaining 15 percent of the investment is not included in the
3 recovery mechanism and therefore does not begin depreciation or earn a return until the
4 next rate proceeding. Further, while PISA provides a process for including new projects
5 in rate base, PISA does not provide the ability to put CWIP into rate base. PISA provides
6 for the deferral of depreciation expense however the expense is not included in rates until
7 there is a general rate case. Therefore, while PISA provides an incentive to invest in
8 capital, on a cash basis, the investment is not recovered until the next rate proceeding.
9 Therefore, this mechanism does not provide cash flow relief similar to other jurisdictions
10 where CWIP can be placed into rate base. Finally, PISA is a program that is set to expire
11 in December 2023. Therefore, the Company has no assurance that the investment that is
12 recovered through this mechanism will continue beyond that date.

13 **Q: What are your conclusions regarding the effect of the Company's capital spending**
14 **requirements on its risk profile and cost of capital?**

15 A: The Company's capital expenditure requirements as a percentage of net utility plant are
16 significant and will continue over the next few years. Additionally, while Evergy Missouri
17 West does have the PISA and RESRAM to recover qualifying capital costs, the mechanism
18 does not provide for timely recovery of all of Evergy Missouri West's capital expenditures.
19 Moreover, a number of the operating subsidiaries of the proxy group have a capital tracking
20 mechanism and/or are able to include CWIP in rate base. As a result, the Company has
21 slightly greater risk relative to the proxy group companies which warrants an authorized
22 ROE above the proxy group mean.

1 **B. Regulatory Risk**

2 **Q: Please explain how the regulatory environment affects investors' risk assessments.**

3 A: The ratemaking process is premised on the principle that, for investors and companies to
4 commit the capital needed to provide safe and reliable utility service, the subject utility
5 must have the opportunity to recover the return of, and the market-required return on,
6 invested capital. Regulatory authorities recognize that because utility operations are capital
7 intensive, their decisions should enable the utility to attract capital at reasonable terms;
8 doing so balances the long-term interests of investors and customers. Utilities must
9 finance their operations and require the opportunity to earn a reasonable return on their
10 invested capital to maintain their financial profiles. Every Missouri West is no exception.
11 In that respect, the regulatory environment is one of the most important factors considered
12 in both debt and equity investors' risk assessments.

13 From the perspective of debt investors, the authorized return should enable the utility to
14 generate the cash flow needed to meet its near-term financial obligations, make the capital
15 investments needed to maintain and expand its systems, and maintain the necessary levels
16 of liquidity to fund unexpected events. This financial liquidity must be derived not only
17 from internally generated funds, but also by efficient access to capital markets. Moreover,
18 because fixed income investors have many investment alternatives, even within a given
19 market sector, the utility's financial profile must be adequate on a relative basis to ensure
20 its ability to attract capital under a variety of economic and financial market conditions.

21 Equity investors require that the authorized return be adequate to provide a risk-comparable
22 return on the equity portion of the utility's capital investments. Because equity investors
23 are the residual claimants on the utility's cash flows (which is to say that the equity return

1 is subordinate to interest payments), they are particularly concerned with the strength of
2 regulatory support and its effect on future cash flows.

3 **Q: Please explain how credit rating agencies consider regulatory risk in establishing a**
4 **company's credit rating.**

5 A: Both S&P and Moody's consider the overall regulatory framework in establishing credit
6 ratings. Moody's establishes credit ratings based on four key factors: (1) regulatory
7 framework; (2) the ability to recover costs and earn returns; (3) diversification; and (4)
8 financial strength, liquidity, and key financial metrics. Of these criteria, regulatory
9 framework, and the ability to recover costs and earn returns are each given a broad rating
10 factor of 25.00 percent. Therefore, Moody's assigns regulatory risk a 50.00 percent
11 weighting in the overall assessment of business and financial risk for regulated utilities.⁶³

12 S&P also identifies the regulatory framework as an important factor in credit ratings for
13 regulated utilities, stating: "One significant aspect of regulatory risk that influences credit
14 quality is the regulatory environment in the jurisdictions in which a utility operates."⁶⁴

15 S&P identifies four specific factors that it uses to assess the credit implications of the
16 regulatory jurisdictions of investor-owned regulated utilities: (1) regulatory stability; (2)
17 tariff-setting procedures and design; (3) financial stability; and (4) regulatory independence
18 and insulation.⁶⁵

⁶³ Moody's Investors Service, Rating Methodology: Regulated Electric and Gas Utilities, at 4 (June 23, 2017).

⁶⁴ Standard & Poor's Global Ratings, Ratings Direct, U.S. and Canadian Regulatory Jurisdictions Support Utilities' Credit Quality—But Some More So Than Others, at 2 (June 25, 2018).

⁶⁵ *Id.*, at 1.

1 **Q: How does the regulatory environment in which a utility operates affect its access to**
2 **and cost of capital?**

3 A: The regulatory environment can significantly affect both the access to, and cost of capital
4 in several ways. First, the proportion and cost of debt capital available to utility companies
5 are influenced by the rating agencies' assessment of the regulatory environment. As noted
6 by Moody's, "[f]or rate regulated utilities, which typically operate as a monopoly, the
7 regulatory environment and how the utility adapts to that environment are the most
8 important credit considerations."⁶⁶ Moody's further highlighted the relevance of a stable
9 and predictable regulatory environment to a utility's credit quality, noting: "[b]roadly
10 speaking, the Regulatory Framework is the foundation for how all the decisions that affect
11 utilities are made (including the setting of rates), as well as the predictability and
12 consistency of decision-making provided by that foundation."⁶⁷

13 **Q: Have you conducted any analysis of the regulatory framework in Missouri relative to**
14 **the jurisdictions in which the companies in your proxy group operate?**

15 A: Yes. I have evaluated the regulatory framework in Missouri considering three factors which
16 are important to ensuring Evergy Missouri West maintains access to capital at reasonable
17 terms. As I will discuss in more detail below, the three factors are: (1) cost recovery
18 mechanisms which allow a utility to recover costs in a timely manner between rate cases
19 and provide the utility the opportunity to earn its authorized return; (2) rate design which
20 if not based on cost causation can result in a significant amount of fixed costs being
21 recovered through the volumetric charge thus increasing cost recovery risk; and (3)

⁶⁶ Moody's Investors Service, Rating Methodology: Regulated Electric and Gas Utilities, at 6 (June 23, 2017).

⁶⁷ *Ibid.*

1 comparable return standard because an awarded ROE that is significantly below the ROEs
2 awarded to other utilities with comparable risks can affect the ability of a utility to attract
3 capital at reasonable terms.

4 **1. Cost Recovery Mechanisms**

5 **Q: Have you conducted any analysis to compare the cost recovery mechanisms of Evergy**
6 **Missouri West to the cost recovery mechanisms approved in the jurisdictions in which**
7 **the companies in your proxy group operate?**

8 A: Yes. I selected six mechanisms that are important to provide a regulated utility an
9 opportunity to earn its authorized ROE. These are: (1) test year convention (i.e., forecast
10 vs. historical); (2) method for determining rate base (i.e., average vs. year-end); (3) use of
11 revenue decoupling mechanisms or formula-based rates that mitigate volumetric risk; (4)
12 prevalence of capital cost recovery between rate cases, and CWIP allowances in rate base;
13 (5) fuel cost recovery and (6) recovery of property taxes. The results of this cost recovery
14 assessment are shown in Schedule AEB-9 and are summarized below.

15 (1) Test year convention: Evergy Missouri West uses a historical test year with limited
16 “known and measurable” changes through a true-up period. By contrast, 42 out of
17 80 (52.50 percent) of the operating companies held by the proxy group provide
18 service in jurisdictions that use either a fully or partially forecasted test year.
19 Forecast test years have been relied on for several years and produce cost estimates
20 that are more reflective of future costs which result in more accurate recovery of
21 incurred costs and mitigates the regulatory lag associated with historical test years.
22 As Lowry, Hovde, Getachew, and Makos explain in their 2010 report, “Forward
23 Test Years for US Electric Utilities”:

1 This report provides an in depth discussion of the test year issue. It includes
2 the results of empirical research which explores why the unit costs of
3 electric IOUs are rising and shows that utilities operating under forward test
4 years realize higher returns on capital and have credit ratings that are
5 materially better than those of utilities operating under historical test years.
6 The research suggests that shifting to a future test year is a prime strategy
7 for rebuilding utility credit ratings as insurance against an uncertain
8 future.⁶⁸

9 (2) Rate Base: The Company's rate base is determined using the year-end rate base
10 method which is consistent with the proxy group since 34 out of 80 (42.50 percent)
11 of the operating companies provide service in jurisdictions where rate base is
12 determined using the year-end method.

13 (3) Non-Volumetric Rate Design: Evergy Missouri West does have partial protection
14 against volumetric risk in Missouri through a Demand Side Investment Mechanism
15 ("DSIM") Rider, however this charge only allows the Company to recover the costs
16 associated with the effect of energy efficiency on sales and does not address other
17 volumetric risk. Comparing to the proxy group companies, 44 out of 80 (55.00
18 percent) of the operating companies held by the proxy group have non-volumetric
19 rate design through either straight fixed variable rate design, revenue decoupling
20 mechanisms or formula rate plans that allow them to break the link between
21 customer usage and revenues.

22 (4) Capital Cost Recovery/CWIP in Rate Base: Evergy Missouri West has capital
23 tracking mechanisms (i.e., PISA and the RESRAM for RES compliance assets) to
24 recover capital investment costs between rate cases. However, as discussed

⁶⁸ M.N. Lowry, D. Hovde, L. Getachew, and M. Makos, Forward Test Years for US Electric Utilities, at 1, prepared for Edison Electric Institute, August 2010.

1 previously, Evergy Missouri West's capital cost recovery mechanism is set to
2 expire in 2023, and is only available as long as overall rates stay at or below the 3%
3 cap. Evergy Missouri West is expected to be significantly closer to the rate cap at
4 the conclusion of this case, and if it exceeds the cap the Company will no longer
5 benefit from the mechanism. Although 65 of 80 (81.25 percent) of the operating
6 companies held by the proxy group have some form of capital cost recovery
7 mechanism and/or are allowed to include CWIP in rate base.⁶⁹ The inclusion of
8 CWIP in rate base reduces regulatory lag associated with new construction, which
9 can be very important particularly when a company is undertaking a large capital
10 investment plan, such as Evergy Missouri West's capital expenditures plan.

11 (5) Fuel Adjustment Clause: Evergy Missouri West's fuel adjustment clause allows the
12 Company to defer and recover 95.00 percent of the difference between the actual
13 net energy costs and net base energy costs.⁷⁰ As shown in Schedule AEB-9, FAC
14 mechanisms are prevalent in the proxy group. In fact, 90.00 percent of the operating
15 companies in the proxy group are allowed to directly recover fuel costs and
16 purchased power costs from customers, without a sharing band.

17 (6) Property Tax Rider: While Evergy Missouri West does not currently have a
18 property tax rider, the Company is requesting a property tax rider which would
19 allow Evergy Missouri West to recover changes in property taxes as compared to
20 the base levels approved in a general rate case. As discussed in the Direct

⁶⁹ Wisconsin's PSC typically authorizes a premium to allow for a rate of return equivalent to a certain CWIP level in rate base.

⁷⁰ Evergy Missouri West Tariff, Fuel Adjustment Clause, Revised Sheet 50.10.

1 Testimony of Michael Adams, there are at least 11 jurisdictions (Arizona,
2 Arkansas, Colorado, Kansas, Minnesota, Montana, New Hampshire, Oregon,
3 Pennsylvania, South Dakota, and Washington) which have approved property tax
4 riders similar to or more advantageous than the mechanism proposed by Evergy
5 Missouri West and three other jurisdictions (Alabama, Indiana and Massachusetts)
6 which have approved broader cost recovery mechanisms that include the recovery
7 of property tax expenses.⁷¹

8 **Q: Does the continuation of the FAC change the business risk of Evergy Missouri West?**

9 A: No, it does not. In accordance with the Commission’s FAC Rule at 20 CSR 4240-
10 20.090(2)(A)14, the Company is required to explain the continuation of the rate adjustment
11 mechanism (“RAM”), which in this case is the FAC, changes the business risk of Evergy
12 Missouri West. The continuation of the FAC will not change Evergy Missouri West’s
13 business risk and will allow the Company to continue to pass through increases or
14 decreases in net energy costs to customers without the need for a time-consuming and
15 costly rate proceeding. Furthermore, as discussed previously, for the purposes of
16 determining the ROE, the risk of the Company is considered in comparison to the proxy
17 group. Since FAC mechanisms are prevalent in the proxy group, the continuation of the
18 FAC for Evergy Missouri West makes the Company more comparable to the proxy group.
19 To the extent that the FAC were eliminated, or materially restructured to recover less of
20 the fuel costs, Evergy Missouri West would have significantly greater risk than the proxy

⁷¹ Direct Testimony of Michael Adams, at 17-24.

1 group and would likely require an upward adjustment to the ROE to reflect this incremental
2 risk.

3 **Q: Have you considered how Evergy Missouri West compares to the proxy group on**
4 **overall cost adjustment mechanisms?**

5 A: Yes. As shown in Schedule AEB-9, the proxy group companies have implemented a
6 number of adjustment mechanisms to mitigate the issue of regulatory lag, including
7 forecasted test years, year-end rate base, decoupling mechanisms, formula-based rates,
8 capital cost recovery mechanisms, fuel adjustment clauses, and CWIP allowances within
9 rate base that specifically address the regulatory lag that may be unique to a given
10 jurisdiction. However, Moody's recently noted that aside from the implementation of
11 PISA, the Missouri regulatory environment has been challenging due to regulatory lag.
12 Moody's noted that Missouri regulation authorizes limited interim base rate recovery
13 mechanisms and requires the use of a historical test year which continues to create
14 regulatory lag.⁷² While Evergy Missouri West has access to some regulatory mechanisms
15 also available to operating companies within the proxy group, these mechanisms are
16 limited. Further, Evergy Missouri West lacks a comprehensive forward-looking
17 mechanism or set of mechanisms, such as including CWIP in rate base, that would remedy
18 the regulatory lag it faces.

⁷² Moody's Investors Service, Credit Opinion, Evergy Missouri West, Inc., p. 4 (April 29, 2021).

1 **2. Rate Design**

2 **Q: Can a Company's rate design increase volumetric risk?**

3 A: Yes. The majority of an electric utility's cost are fixed costs that are incurred to construct
4 and maintain the distribution system. As such, most of a utility's costs do not vary with
5 energy consumption. However, rates are often structured to recover a large portion of a
6 utility's fixed costs on a variable basis. This is particularly true for the residential customer
7 class. Since a customer's usage varies from year to year, the more fixed costs that are
8 recovered on a variable basis, the higher the volatility of annual cost recovery for the
9 company. Therefore, cost recovery for utilities that have higher fixed customer charges
10 are less susceptible to fluctuations in usage and are more likely to recover their costs to
11 serve customers.

12 Furthermore, the design of an energy (or variable) charge can also directly affect the
13 volatility of fixed cost recovery. For example, for the residential rate class, an energy
14 charge can be designed as an inclining, declining or flat block rate structure. A block rate
15 structure is considered: (a) inclining if the energy charge increases as the amount of energy
16 consumed increases; (b) flat if the energy charge is the same for all levels of energy usage;
17 and (c) declining if the energy charges decrease as the amount of energy consumed
18 decreases. A utility with an inclining block rate design would be more susceptible to
19 variability in earnings associated with year-to-year fluctuations in usage since a larger
20 portion of fixed costs would be recovered from the higher usage blocks.

21 Energys Missouri West's residential rate class has a customer charge of \$11.47 which is
22 low, as discussed below. The residential rate class also has an inclining block rate structure
23 for the energy charge in the summer season which is important because the Company

1 usually has its highest revenue during the year in the third quarter due to the demand for
2 energy created by the summer air conditioning load; thus, the Company faces increased
3 volumetric risk associated with the residential rate class.

4 **Q: Have you developed any analysis to evaluate the effect of rate design on the volumetric**
5 **risk of Evergy Missouri West?**

6 A: Yes. It is important to review the size of the customer charges and structure of the energy
7 charges when assessing the volumetric risk of Evergy Missouri West as compared to the
8 proxy group. Therefore, for the residential rate class, I have compared the level of the
9 customer charge and the design of the energy charge (i.e., inclining, declining and flat) of
10 Evergy Missouri West and the operating subsidiaries of the companies in the proxy group.
11 As shown in Schedule AEB-10, Evergy Missouri West has a residential customer charge
12 of \$11.47 while the average customer charge for the utility operating companies of the
13 proxy group is between \$4.20 to \$33.03 with a mean of \$11.96. Moreover, approximately
14 78.48 percent of the operating subsidiaries held by the proxy group companies have either
15 a flat or declining block rate structure for the residential energy charge. Therefore, Evergy
16 Missouri West has greater volumetric risk compared to the proxy group as a result of the
17 Company's residential rate design.

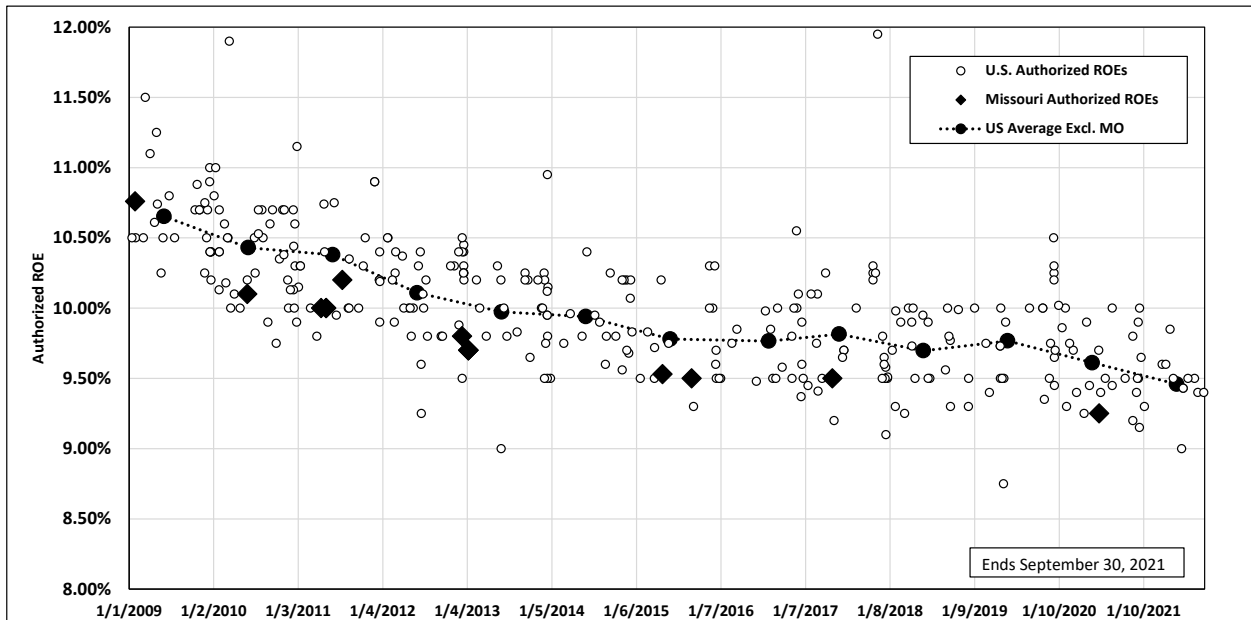
18 **3. Authorized ROEs**

19 **Q: How do recent returns in Missouri compare to the authorized returns in other**
20 **jurisdictions?**

21 A: Figure 12 below shows the authorized returns for vertically integrated electric utilities in
22 other jurisdictions since January 2009, and the returns authorized in Missouri for electric
23 utilities. While partially the result of settlement agreements approved by the Commission,

1 as shown in Figure 12, the authorized returns for electric utilities in Missouri have been
 2 below the average authorized ROE for vertically integrated electric utilities in other
 3 jurisdictions since 2010.

4 **Figure 12: Comparison of Missouri and U.S. Authorized Electric Returns⁷³**



5
 6
 7 **Q: Should the Commission be concerned about authorizing equity returns that are at the**
 8 **low end of the range established by other state regulatory jurisdictions?**

9 **A:** Yes, for several reasons. Evergy Missouri West must compete for discretionary capital
 10 within the Company’s own corporate structure, which must in turn compete for capital with
 11 other utilities and businesses. Placing Evergy Missouri West at the low end of recently
 12 authorized ROEs across state regulatory jurisdictions, coupled with the relatively high

⁷³ S&P Capital IQ Pro. Includes only vertically integrated electric utility ROEs between January 1, 2009, and September 30, 2021. The chart excludes the authorized returns in Vermont since they are established based on a formulaic approach that is directly linked to interest rates and therefore is affected by market conditions and monetary policy.

1 regulatory risk faced in Missouri over the longer term can negatively impact the
2 Company's access to capital.

3 Further, as noted in Sections IV and VI, the economy is in the expansion phase of the
4 business cycle; thus, interest rates are expected to increase, and utilities are expected to
5 underperform over the near-term. If utility stocks underperform over the near-term then
6 utility dividend yields will increase resulting in higher estimates of the ROE results
7 produced by the DCF model. Therefore, the results of the DCF model will underestimate
8 investors' expected ROE over the time-period in which Evergy Missouri West's rates will
9 be in effect. As a result, it is important that the Commission consider, the results of
10 alternative methods such as the forward looking CAPM, ECAPM, and Bond Yield Plus
11 Risk Premium and the returns that have been authorized by other electric utilities across
12 the U.S.

13 **Q: Do credit rating agencies consider the authorized ROE in the overall risk assessment**
14 **of a utility?**

15 A: Yes, they do. Therefore, to the extent that the returns in a jurisdiction are lower than the
16 returns that have been authorized more broadly, credit rating agencies will consider this in
17 the overall risk assessment of the regulatory jurisdiction in which the company operates.
18 For example, Moody's downgraded ALLETE, Inc. from A3 to Baa1 primarily based on
19 the less than favorable outcome in Minnesota Power's last fully litigated rate case in
20 Minnesota which included what Moody's noted was a below average authorized ROE of
21 9.25 percent.⁷⁴ In addition, FitchRatings downgraded CenterPoint Energy Houston

⁷⁴ Moody's Investors Service, Credit Opinion: ALLETE, Inc. Update following downgrade, at 3 (April 3, 2019).

1 Electric’s (“CEHE”) Long-Term Issuer Default rating from A- to BBB+ and revised the
2 rating outlook from Stable to Negative following the approval of an unfavorable outcome
3 in a recent rate case in Texas.⁷⁵ Finally, FitchRatings recently downgraded and maintained
4 a negative outlook for Arizona Public Service Company (“APS”) and its parent, Pinnacle
5 West Capital Corporation, following the hearings conducted by the Arizona Corporation
6 Commission (“ACC”) in October 2021 regarding APS’ current rate case proceeding.⁷⁶
7 While the ACC had not issued a final order in APS’ rate case at the time, FitchRatings
8 noted that the developments at the hearing in October indicate a likely credit negative
9 outcome that will negatively affect the financial metrics of both APS and Pinnacle West
10 Capital Corporation. It is also important to note that Moody’s recently placed both APS
11 and Pinnacle West Capital Corporation on review for downgrade following the ACC
12 hearing in October.⁷⁷

13 **Q: How should the Commission use the information regarding authorized ROEs in other**
14 **jurisdictions in determining the ROE for Evergy Missouri West?**

15 **A:** As discussed above, the companies in the proxy group operate in multiple jurisdictions
16 across the U.S. Since Evergy Missouri West must compete directly for capital with
17 investments of similar risk, it is appropriate to review the authorized ROEs in other
18 jurisdictions. The comparison is important because investors are considering the

⁷⁵ FitchRatings, Fitch Downgrades CenterPoint Energy Houston Electric to BBB+; Affirms CNP; Outlooks Negative, (Feb. 19, 2020).

⁷⁶ FitchRatings, “Fitch Downgrades Pinnacle West Capital & Arizona Public Service to 'BBB+'; Outlooks Remain Negative” (Oct. 12, 2021).

⁷⁷ Moody’s Investors Service, “Rating Actions: Moody’s places Pinnacle West and Arizona Public Service ratings on review for downgrade,” (Oct. 12, 2021).

1 authorized returns across the U.S. and are likely to invest equity in those utilities with the
2 highest returns.

3 Furthermore, investors are also likely to consider business and financial risks for a
4 company like Evergy Missouri West which faces increased risk as a result of its capital
5 expenditure plan and limited cost recovery mechanisms. Therefore, authorizing an ROE
6 for Evergy Missouri West that is equivalent to the average authorized ROE for other
7 vertically integrated electric utilities is not sufficient to compensate investors for the added
8 risk of Evergy Missouri West. As such, it is important that the Commission consider, as I
9 have in my recommendation, the additional risk of Evergy Missouri West and place the
10 authorized ROE for Evergy Missouri West towards the high end of authorized ROEs for
11 other vertically integrated electric utilities.

12 **Q: Have you developed any additional analyses to evaluate the regulatory environment**
13 **in Missouri as compared to the jurisdictions in which the companies in your proxy**
14 **group operate?**

15 A: Yes. I have conducted two additional analyses to compare the regulatory framework of
16 Missouri to the jurisdictions in which the companies in the proxy group operate.
17 Specifically, I considered two different rankings: (1) the Regulatory Research Associates
18 (“RRA”) ranking of regulatory jurisdictions; and (2) S&P’s ranking of the credit
19 supportiveness of regulatory jurisdictions.

20 **Q: Please explain how you used the RRA ratings to compare the regulatory jurisdictions**
21 **of the proxy group companies with the Company’s regulatory jurisdiction.**

22 A: RRA develops their ranking based on their assessment of how investors perceive the
23 regulatory risk associated with ownership of utility securities in that jurisdiction,

1 specifically reflecting their assessment of the probable level and quality of earnings to be
2 realized by a state’s utilities as a result of regulatory, legislative, and court actions. RRA
3 assigns a ranking for each regulatory jurisdiction between “Above Average/1” to “Below
4 Average/3,” with nine total rankings between these categories. I applied a numeric ranking
5 system to the RRA rankings with “Above Average/1” assigned the highest ranking (“1”)
6 and “Below Average/3” assigned the lowest ranking (“9”). As shown in Schedule AEB-
7 11, the Missouri regulatory environment is ranked as “Average/3,” while the proxy group
8 is ranked between “Average/1” and “Average/2”.

9 **Q: How did you conduct your analysis of the S&P credit supportiveness ranking?**

10 A: S&P classifies the regulatory jurisdictions into five categories ranging from “Credit
11 Supportive” to “Most Credit Supportive” based on the level of credit supportiveness.
12 Similar to the RRA regulatory ranking analysis discussed above, I assigned a numerical
13 ranking to each jurisdiction ranked by S&P, from most credit supportive (“1”) to credit
14 supportive (“5”). As shown in Schedule AEB-12, the proxy group is ranked between very
15 credit supportive and highly credit supportive while the Missouri regulatory jurisdiction is
16 only ranked as very credit supportive. Thus, similar to the results using the RRA regulatory
17 rankings, Missouri is perceived as being below the average for the proxy group.

18 **Q: What are your conclusions regarding the perceived risks related to the Missouri
19 regulatory environment?**

20 A: Both Moody’s and S&P have identified the supportiveness of the regulatory environment
21 as an important consideration in developing their overall credit ratings for regulated
22 utilities. Considering the available regulatory adjustment mechanisms, many of the
23 companies in the proxy group have cost recovery mechanisms that provide stronger

1 financial support than those that Evergy Missouri West is permitted to implement.
2 Additionally, authorized ROEs in Missouri have been below the average authorized ROEs
3 for vertically integrated electric utilities across the U.S. Both, the RRA jurisdictional
4 ranking and the S&P credit supportiveness ranking for Missouri indicates greater risk than
5 the average for the proxy group. Therefore, the average ROE for the proxy group actually
6 understates the return on equity that an investor would require in Missouri because the risks
7 of timely and full cost recovery are greater for Evergy Missouri West in Missouri than for
8 the proxy group. For that reason, I conclude that the authorized ROE for Evergy Missouri
9 West should be higher than the proxy group mean.

10 C. Generation Ownership

11 **Q: How does the business risk of vertically integrated electric utilities compare to the**
12 **business risk of other regulated utilities?**

13 A: According to Moody's, generation ownership causes vertically integrated electric utilities
14 to have higher business risk than either electric transmission and distribution companies,
15 or natural gas distribution or transportation companies.⁷⁸ As a result of this higher business
16 risk, integrated electric utilities typically require a higher ROE or percentage of equity in
17 the capital structure than other electric or gas utilities.

⁷⁸ Moody's Investors Service, Rating Methodology: Regulated Electric and Gas Utilities, at 21-22 (June 23, 2017).

1 **Q: Are there other risk factors specific to vertically integrated electric utilities that the**
2 **credit rating agencies consider when determining the credit rating of a company that**
3 **owns generation?**

4 A: Yes. As discussed above, Moody’s establishes credit ratings based on four key factors: (1)
5 regulatory framework; (2) the ability to recover costs and earn returns; (3) diversification;
6 and (4) financial strength, liquidity and key financial metrics. The third factor of
7 diversification, which Moody’s assigns a 10.00 percent weighting in the overall
8 assessments of a company’s business risk, considers the fuel source diversity of a utility
9 with generation. Moody’s notes:

10 For utilities with electric generation, fuel source diversity can mitigate the
11 impact (to the utility and to its rate-payers) of changes in commodity prices,
12 hydrology and water flow, and environmental or other regulations affecting
13 plant operations and economics. We have observed that utilities’ regulatory
14 environments are most likely to become unfavorable during periods of rapid
15 rate increases (which are more important than absolute rate levels) and that
16 fuel diversity leads to more stable rates over time.

17 For that reason, fuel diversity can be important even if fuel and purchased
18 power expenses are an automatic pass-through to the utility’s ratepayers.
19 Changes in environmental, safety and other regulations have caused
20 vulnerabilities for certain technologies and fuel sources during the past five
21 years. These vulnerabilities have varied widely in different countries and
22 have changed over time.⁷⁹

23 **Q: Has Missouri enacted legislative requirements related to renewable energy?**

24 A: Yes. In 2008, the voters of Missouri approved a mandatory renewable portfolio standard
25 (“RPS”) which became Section 393.1030. The RPS requires electric utilities to generate or
26 purchase 15 percent of their electricity sales with power generated from renewable energy
27 sources by 2021. As discussed previously, S.B.564 became law in 2018, allowing Plant in

⁷⁹ *Id.*, at 16.

1 Service Accounting treatment for “qualifying electric plant” that included renewable
2 resources. In addition, in July 2021, House Bill (“HB”) 734 was signed into law which
3 contained provisions that allow electric utilities to securitize their investment in coal
4 generation facilities that has yet to be recovered from customers after the generation facility
5 has been retired as well as in renewable generating facilities that qualify as “replacement
6 resources”. Thus, a major effect of the legislation is to accelerate the transition in Missouri
7 from coal generation to renewable generation such as wind and solar.⁸⁰

8 **Q: Is Evergy subject to legislative mandates regarding renewable generation in other**
9 **jurisdictions?**

10 A: Yes. In May 2009 Kansas enacted the Renewable Energy Standards Act (“RESRA”) which
11 required investor-owned electric utilities and electric cooperatives to either generate or
12 purchase 20 percent of their peak demand from renewable energy sources by the year
13 2020.⁸¹ It is important to note that the legislation was mandatory at the time enacted;
14 however, the approval of Senate Bill (“SB”) 91 in May 2015 adjusted the RPS from
15 mandatory to voluntary. Additionally, similar to Missouri, Senate Substitute for House Bill
16 2072 was signed into law in April 2021 which allows securitization of coal generation plant
17 costs after the retirement of the plants to accelerate the transition in Kansas from coal to
18 renewable generation.⁸²

⁸⁰ See §§ 393.1700, 393.1705, and 393.1715.

⁸¹ Kan. Stat. Ann. §66-1256 through 66-1262.

⁸² Carpenter, Tim, “Kansas opts for bonding to help consumers with energy price shocks, transition from coal,” Kansas Reflector, April 19, 2021.

1 **Q: What are the fuel sources that Evergy currently relies primarily on for its generation**
2 **portfolio?**

3 A: As of December 2020, Evergy’s total generation capacity consisted of 37 percent coal, 30
4 percent natural gas and oil, 25 percent wind, 7 percent nuclear and less than 1 percent solar,
5 landfill gas and hydroelectric.⁸³ Further, Evergy’s total generation (MWh) is 42.08 percent
6 coal, 4.20 percent natural gas and oil, 53.38 percent wind and less than 1 percent solar,
7 landfill gas and hydroelectric.⁸⁴

8 **Q: Is Evergy’s generation portfolio currently in a state of transition?**

9 A: Yes. As described in the 2021 Integrated Resource Plan (“IRP”), Evergy is taking near
10 term actions to retire fossil fuel generation units and invest in new renewable generation.
11 Specifically, Evergy expects to retire approximately 1,200 MWs of fossil fuel generation
12 (i.e., coal, oil and natural gas) and add approximately 3,200 MWs of renewable generation
13 (i.e., solar and wind) over the next ten years.⁸⁵ In fact, Evergy projects that it will retire
14 nearly all remaining coal generation by 2040 with the goal of net-zero carbon emissions by
15 2045.

16 **Q: How does Evergy’s generation investment plan affect its business risk?**

17 A: The Company’s 2021 IRP includes significant investment in adding new wind and solar
18 generation. This significant investment in renewable energy will require continued access
19 to capital markets, which highlights the importance of granting Evergy Missouri West an
20 allowed ROE and equity ratio that is sufficient to attract capital at reasonable terms.

⁸³ Evergy, “Evergy 2021 Integrated Resource Plan Overview”, at 4 (April 2021).

⁸⁴ Evergy Missouri West Executive Summary Integrated Resource Plan 4 CSR 240-22.010 at 9. (April 2021).

⁸⁵ Evergy, “Evergy 2021 Integrated Resource Plan Overview”, at 4 (April 2021).

1 **Q: What are your conclusions regarding the perceived risks related to the fuel mix of**
2 **Evergy's generation portfolio?**

3 A: Evergy generates a significant percentage of its electricity using coal-fired generation. As
4 renewable resources have become more economic, Evergy has planned to reduce customer
5 costs by making sizable future capital expenditures to become less dependent on coal-fired
6 generation. While the Company intends to improve fuel diversity over the long run, the
7 plans will require continued access to capital markets to finance the new investments. The
8 Company's existing generation portfolio and proposed generation investment plans
9 increase the overall risk profile as compared with the proxy group.

10 **D. Sibley Coal Plant Retirement**

11 **Q: Please summarize the Sibley coal plant retirement.**

12 A: As discussed by Company witness Larry Kennedy, the Company fully retired the Sibley
13 plant in 2018 and Accounting Authority Orders ("AAO") were established to aggregate the
14 recovery of any financial impacts of the retirement which would then be considered in the
15 next rate case. The Company projects that as of November 30, 2022, \$49.54 million of
16 operating expenses and return on investment will be deferred pursuant to the AAO and
17 \$41.45 million of depreciation will be deferred to be applied to the accumulated plant
18 reserve in the 2022 rate case pursuant to the 2018 rate case stipulation and agreement.

19 **Q: What is the implication of the Sibley coal plant retirement and the disposition of the**
20 **AAO on the Company's risk profile?**

21 A: The Commission's decision in the complaint case, No. EC-2019-0200, to establish an AAO
22 for the operating expense savings and return on investment increases the risk of Evergy
23 Missouri West for two reasons. First, the Commission's order the complaint case

1 determined that the retirement of the Sibley coal plant was an “extraordinary” event under
2 deferral accounting principles and ordered the Company to establish a regulatory liability
3 for the revenue and the return on the Sibley investments collected in rates. However, the
4 Commission expressly noted that whether the decision to retire Sibley was prudent would
5 be addressed in a future general rate case.⁸⁶ Even though the order did not comment on
6 whether the retirement was prudent it increases uncertainty regarding whether or not the
7 Commission will ultimately allow the Company to recover the return of and return on its
8 investment in the Sibley coal plant as of the time of retirement. A decision to disallow a
9 portion of the Company’s investment (i.e., refund return on investment since the time of
10 retirement) would be viewed as credit negative by the rating agencies and could have a
11 significant effect on the financial metrics of the Company if there were to be a significant
12 disallowance. Second, a negative decision regarding the AAO in the current proceeding
13 could provide a disincentive for retiring coal plants in the future and negatively affect the
14 state’s transition from fossil fuels to renewable energy. This would be counter to the effect
15 of the House Bill (“HB”) 734 which was signed into law and discussed above that allows
16 securitization of coal generation plant costs after the retirement of the plants.

17 **Q: How have credit rating agencies and equity analysts reacted to the Sibley plant**
18 **retirement and the Commission’s decision in the complaint case to establish an AAO?**

19 **A:** Yes, they have. As noted above both Bank of America and Moody’s concluded that the
20 Commission’s decision had a negative effect on the Company and the views of investors
21 and credit analysts regarding the regulatory environment in Missouri. Specifically, Bank

⁸⁶ Office of Public Counsel v. KCP&L Greater MO. Operations Co. No. EC-2019-0200, Report and Order, at 13-15 (Oct. 17, 2019).

1 of America noted in a research note on October 11, 2019 that the decision caused “market
2 participants questioning of the fairness of Missouri regulation” and resulted in investors
3 altering expectations to reflect: 1) the likelihood that the Company would not pursue up to
4 \$850 million of incremental capital expenditures; and 2) the financial impact of customer
5 refunds.⁸⁷ Similarly, Moody’s commented on October 11, 2019 that it also viewed the
6 decision as credit negative because it: 1) indicated a weaker regulatory relationship
7 between the Commission and the Company; 2) could result in a reduction in the
8 incremental capital that the Company plans to invest in Missouri; and 3) could create a
9 disincentive for the future retirement of coal plants in Missouri.⁸⁸ Furthermore in a more
10 recent credit report issued on April 28, 2020, Moody’s noted that the recovery of the Sibley
11 rate base was a credit challenge for Evergy Missouri West.⁸⁹

12 **Q: What are your conclusions regarding the effect of the Sibley plant retirement on the**
13 **cost of equity of the Company?**

14 A: The Commission’s decision with respect to the deferral of the recovery of the investment
15 in, return on and operating expenses related to Sibley increases uncertainty regarding the
16 recovery of the Company’s investment in Sibley at the time of retirement. As noted by
17 Moody’s, the uncertainty regarding recovery of the Company’s investment increases the
18 risk of the Company and warrants an ROE that is greater than the proxy group mean.

⁸⁷ Bank of America Merrill Lynch, “US Electric Utilities & IPPs: Midweek PPTS: PCG Feedback, EVRG Response, XEL’s EVs in XEL, at 1 (Oct. 11, 2019).

⁸⁸ Moody’s Investor Service, Issuer Comment: KCP&L Greater Missouri Operations Company, at 1-2 (Oct. 11, 2019).

⁸⁹ Moody’s Investor Service, Credit Opinion: Evergy Missouri West, Inc., at 2 (Apr. 28, 2020).

1 **VIII. CAPITAL STRUCTURE, COST OF DEBT, OVERALL RATE OF RETURN**

2 **A. Capital Structure**

3 **Q: Is the capital structure of the Company an important consideration in the**
4 **determination of the appropriate ROE?**

5 A: Yes, it is. Assuming other factors equal, a higher debt ratio increases the risk to investors.
6 For debt holders, higher debt ratios result in a greater portion of the available cash flow
7 being required to meet debt service, thereby increasing the risk associated with the
8 payments on debt. The result of increased risk is a higher interest rate. The incremental
9 risk of a higher debt ratio is more significant for common equity shareholders, who are the
10 residual claimants on the cash flow of the Company. Therefore, the greater the debt service
11 requirement, the less cash flow is available for common equity holders.

12 **Q: What is Evergy Missouri West's proposed capital structure?**

13 A: As shown in Schedule AEB-13, the Company proposes to establish a projected capital
14 structure as of the recommended true-up date of May 31, 2022 of 51.81 percent common
15 equity and 48.19 percent long-term debt.

16 **Q: Did you conduct any analysis to determine if the requested equity ratio was**
17 **reasonable?**

18 A: Yes, I did. I reviewed the Company's proposed capital structure and the capital structures
19 of the utility operating subsidiaries of the proxy companies. Because the ROE is set based
20 on the return that is derived from the risk-comparable proxy group, it is reasonable to look
21 to the proxy group average capital structure to benchmark the equity ratio for the Company.

1 **Q: Please discuss your analysis of the capital structures of the proxy group companies.**

2 A: I calculated the mean proportions of common equity, long-term debt, and preferred equity
3 over the most recent eight quarters⁹⁰ for each of the companies in my proxy group at the
4 operating subsidiary level. My analysis of the capital structures of the companies in the
5 proxy group is provided in Schedule AEB-14. As shown in that Schedule, the mean equity
6 ratio for the proxy group at the operating utility company level is 52.86 percent. The
7 average equity ratios for the utility operating companies held by the proxy group range
8 from a low of 46.97 percent to a high of 60.85 percent. Evergy Missouri West's proposed
9 equity ratio of 51.81 percent is well within the range of equity ratios for the utility operating
10 subsidiaries of the proxy group companies and is therefore reasonable.

11 **Q: Are there other factors to be considered in setting the Company's capital structure?**

12 A: Yes. The credit rating agencies' response to the Tax Cuts and Jobs Act of 2017 ("TCJA")
13 must also be considered when determining the equity ratio. All three rating agencies have
14 noted that the TCJA has negative implications for utility cash flows. S&P and FitchRatings
15 have specifically identified increasing the equity ratio as one approach to ensure that
16 utilities have sufficient cash flows following the tax cuts and the loss of bonus depreciation.
17 Furthermore, Moody's downwardly revised the rating outlook for the entire utilities sector
18 in June 2018 and has continued to downgrade the ratings of utilities based in part on the
19 negative effects of the TCJA on cash flows.

20 Additionally, it is also important to consider the negative effects of COVID-19 on the credit
21 metrics of utilities. In April 2020, Standard & Poor's downwardly revised the outlook on

⁹⁰ The source data for this analysis is the operating company data provided in FERC Form 1 reports. Due to the timing of those filings, my average capital structure analysis uses the quarterly capital structures reported for the proxy group companies for the period from the third quarter of 2019 through the second quarter of 2021.

1 the entire North American utilities sector. It noted that COVID-19 would create
2 incremental pressure on credit metrics and that a recession would lead to an increasing
3 number of credit rating downgrades and negative outlooks.⁹¹

4 Finally, S&P has continued to maintain a negative outlook for the utility industry in 2021
5 noting that so far in 2021 downgrades have outpaced upgrades with the median rating of
6 the industry approaching the BBB category which would be the first time that has ever
7 occurred.⁹² S&P expects continued pressure on cash flows over the near-term as utilities
8 continue to increase leverage to fund capital expenditure plans necessary to reduce
9 greenhouse gas emissions and to improve safety and reliability.⁹³ The continued concerns
10 of credit ratings agencies over the negative effects of the TCJA, COVID-19 and increased
11 capital expenditures underscores the importance of maintaining adequate cash flow metrics
12 for the industry—and for Evergy Missouri West, in the context of this proceeding.

13 **Q: Is there a relationship between the equity ratio and the authorized ROE?**

14 A: Yes. The equity ratio is the primary indicator of financial risk for a regulated utility such
15 as Evergy Missouri West. To the extent the equity ratio is reduced, it is necessary to
16 increase the authorized ROE to compensate investors for the greater financial risk
17 associated with a lower equity ratio.

⁹¹ Standard & Poor's Ratings Direct, COVID-19: The Outlook for North American Regulated Utilities Turns Negative, April 2, 2020.

⁹² S&P Global Ratings, "North American Regulated Utilities' Credit Quality Begins the Year on A Downward Path," April 7, 2021.

⁹³ *Ibid.*

1 **Q: Will the capital structure and ROE authorized in these proceedings affect the**
2 **Company's access to capital at reasonable rates?**

3 A: Yes. The level of earnings authorized by the Commission directly affects the Company's
4 ability to fund its operations with internally generated funds. Both bond investors and
5 rating agencies expect a significant portion of ongoing capital investments to be financed
6 with internally generated funds.

7 It also is important to realize that because a utility's investment horizon is very long,
8 investors require the assurance of a sufficiently high return to satisfy the long-run financing
9 requirements of the assets placed into service. Those assurances, which often are measured
10 by the relationship between internally generated cash flows and debt (or interest expense),
11 depend quite heavily on the capital structure. As a consequence, both the ROE and capital
12 structure are very important to debt and equity investors. Furthermore, considering the
13 capital market conditions discussed in Section IV, the authorized ROE and capital structure
14 take on even greater significance.

15 **Q: What is your conclusion regarding an appropriate equity ratio for Evergy Missouri**
16 **West?**

17 A: Considering the actual capital structures of the proxy group operating companies, I believe
18 that Evergy Missouri West's proposed common equity ratio of 51.81 percent is reasonable.
19 The proposed equity ratio is well within the range of equity ratios established by the capital
20 structures of the utility operating subsidiaries of the proxy companies. In addition, based
21 on the cash flow concerns raised by credit rating agencies as a result of the TCJA, COVID-
22 19 and increased capital expenditures, this proposal is reasonable.

1 **B. Cost of Long-term Debt**

2 **Q: What is Evergy Missouri West’s proposed cost of long-term debt?**

3 A: As shown in Schedule AEB-13, the Company’s cost of long-term debt is 3.79 percent.

4 **Q: Have you evaluated the Company’s proposed cost of long-term debt?**

5 A: Yes, I have reviewed the embedded cost of long-term debt for Evergy Missouri West. My
6 analysis evaluated the cost at the time of issuance for each of the issuances listed in
7 Schedule AEB-13 in comparison with the market at that time. I compared the Moody’s Baa
8 and A-rated utility bond indexes to the embedded long-term debt costs. As shown in
9 Schedule AEB-15 this analysis demonstrates that the embedded cost of debt is reasonable.

10 **C. Overall Rate of Return**

11 **Q: Based on the Company’s proposed capital structure, long-term debt cost and your**
12 **recommended ROE, what is the recommended overall Rate of Return?**

13 A: As shown in Figure 13 below, the recommended overall rate of return is 7.20 percent.

14 **Figure 13: Overall Rate of Return**

	Ratio	Cost Rate	Weighted Cost Rate
Long-Term Debt	48.19%	3.79%	1.87 %
Common Equity	51.81%	10.00%	5.33 %
Overall Rate of Return	100.00%		7.20 %

15

16 **IX. CONCLUSIONS AND RECOMMENDATION**

17 **Q: What is your conclusion regarding a fair ROE for Evergy Missouri West?**

18 A: Figure 14 below provides a summary of my analytical results. Based these results and the
19 qualitative analyses presented in my Direct Testimony, a reasonable range of ROE results
20 for Evergy Missouri West is from 9.90 percent to 10.50 percent and the Company’s

1 requested rate of return on common equity of 10.00 percent is reasonable taking into
2 consideration Evergy Missouri West's company-specific risks relative to the proxy group,
3 as discussed in my Direct Testimony. This ROE would enable the company to maintain
4 its financial integrity and therefore its ability to attract capital at reasonable terms under a
5 variety of economic and financial market conditions, while continuing to provide safe,
6 reliable and affordable electric service to customers in Missouri.

1

Figure 14: Summary of Analytical Results

<i>Constant Growth DCF - Median</i>			
	Median Low	Median	Median High
30-Day Average	8.83%	9.58%	10.03%
90-Day Average	8.78%	9.36%	10.03%
180-Day Average	8.81%	9.38%	10.10%
<i>Constant Growth DCF - Average w/ exclusions⁹⁴</i>			
	Mean Low	Mean	Mean High
30-Day Average	8.66%	9.49%	10.03%
90-Day Average	8.67%	9.50%	10.05%
180-Day Average	8.89%	9.58%	10.13%
<i>CAPM</i>			
	Current 30-day Average Treasury Bond Yield	Near-Term Blue Chip Forecast Yield	Long-Term Blue Chip Forecast Yield
Value Line Beta	11.62%	11.68%	11.80%
Bloomberg Beta	10.76%	10.87%	11.07%
Long-term Avg. Beta	9.60%	9.77%	10.08%
<i>ECAPM</i>			
	Current 30-day Average Treasury Bond Yield	Near-Term Blue Chip Forecast Yield	Long-Term Blue Chip Forecast Yield
Value Line Beta	11.95%	12.00%	12.09%
Bloomberg Beta	11.30%	11.39%	11.53%
Long-term Avg. Beta	10.43%	10.56%	10.79%
<i>Treasury Yield Plus Risk Premium</i>			
	Current 30-day Average Treasury Bond Yield	Near-Term Blue Chip Forecast Yield	Long-Term Blue Chip Forecast Yield
Risk Premium Results	9.49%	9.74%	10.17%

2

⁹⁴ Constant Growth DCF analysis - Average w/ Exclusions represents the DCF results excluding the results for individual companies that did not meet the minimum threshold of 7 percent.

1 **Q: What is your conclusion with respect to Evergy Missouri West's proposed capital**
2 **structure?**

3 A: My conclusion is that Evergy Missouri West's proposal to establish a capital structure
4 consisting of 51.81 percent common equity, and 48.19 percent long-term debt is
5 reasonable. This conclusion is supported by comparing this proposal to the capital
6 structures of the companies in the proxy group and taking in consideration the effect of
7 increased capital expenditures and COVID-19 on cash flows and therefore should be
8 adopted.

9 **Q: Does this conclude your Direct Testimony?**

10 A: Yes, it does.

ANN E. BULKLEY

Senior Vice President

Ms. Bulkley has more than two decades of management and economic consulting experience in the energy industry. Ms. Bulkley has extensive state and federal regulatory experience on both electric and natural gas issues including rate of return, cost of equity and capital structure issues. Ms. Bulkley has provided expert testimony on the cost of capital in nearly 100 regulatory proceedings before 32 state regulatory commissions and the Federal Energy Regulatory Commission. In addition to her regulatory experience, Ms. Bulkley has provided valuation and appraisal services for a variety of purposes including the sale or acquisition of utility assets, regulated ratemaking, ad valorem tax disputes, and other litigation purposes. In addition, Ms. Bulkley has experience in the areas of contract and business unit valuation, strategic alliances, market restructuring and regulatory and litigation support. Prior to joining Concentric, Ms. Bulkley held senior expertise-based consulting positions at several firms, including Reed Consulting Group and Navigant Consulting, Inc. where she specialized in valuation. Ms. Bulkley holds an M.A. in economics from Boston University and a B.A. in economics and finance from Simmons College. Ms. Bulkley is a Certified General Appraiser licensed in the Commonwealth of Massachusetts and the State of New Hampshire.

REPRESENTATIVE PROJECT EXPERIENCE

Regulatory Analysis and Ratemaking

Ms. Bulkley has provided a range of advisory services relating to regulatory policy analysis and many aspects of utility ratemaking. Specific services have included: cost of capital and return on equity testimony, cost of service and rate design analysis and testimony, development of ratemaking strategies; development of merchant function exit strategies; analysis and program development to address residual energy supply and/or provider of last resort obligations; stranded costs assessment and recovery; performance-based ratemaking analysis and design; and many aspects of traditional utility ratemaking (e.g., rate design, rate base valuation).

Cost of Capital

Ms. Bulkley has provided expert testimony on the cost of capital and capital structure in nearly 100 regulatory proceedings before state and federal regulatory commissions in the United States.

Ratemaking

Ms. Bulkley has assisted several clients with analysis to support investor-owned and municipal utility clients in the preparation of rate cases. Sample engagements include:

- Assisted several investor-owned and municipal clients on cost allocation and rate design issues including the development of expert testimony supporting recommended rate alternatives.

Worked with Canadian regulatory staff to establish filing requirements for a rate review of a newly regulated electric utility. Analyzed and evaluated rate application. Attended hearings and conducted



investigation of rate application for regulatory staff. Prepared, supported and defended recommendations for revenue requirements and rates for the company. Developed rates for gas utility for transportation program and ancillary services.

Valuation

Ms. Bulkley has provided valuation services to utility clients, unregulated generators and private equity clients for a variety of purposes including ratemaking, fair value, ad valorem tax, litigation and damages, and acquisition. Ms. Bulkley's appraisal practices are consistent with the national standards established by the Uniform Standards of Professional Appraisal Practice.

Representative projects/clients have included:

- Prepared appraisals of electric utility transmission and distribution assets for ad valorem tax purposes.
- Prepared appraisals of several hydroelectric generating facilities for ad valorem tax purposes.
- Conducted appraisals of fossil fuel generating facilities for ad valorem tax purposes.
- Conducted appraisals of generating assets for the purposes of unwinding sale-leaseback agreements.
- Confidential Utility Client: Prepared valuation of fossil and nuclear generation assets for financing purposes for regulated utility client.
- Prepared a valuation of a portfolio of generation assets for a large energy utility to be used for strategic planning purposes. Valuation approach included an income approach, a real options analysis and a risk analysis.
- Assisted clients in the restructuring of NUG contracts through the valuation of the underlying assets. Performed analysis to determine the option value of a plant in a competitively priced electricity market following the settlement of the NUG contract.
- Prepared market valuations of several purchase power contracts for large electric utilities in the sale of purchase power contracts. Assignment included an assessment of the regional power market, analysis of the underlying purchase power contracts, a traditional discounted cash flow valuation approach, as well as a risk analysis. Analyzed bids from potential acquirers using income and risk analysis approached. Prepared an assessment of the credit issues and value at risk for the selling utility.
- Prepared appraisal of a portfolio of generating facilities for a large electric utility to be used for financing purposes.
- Prepared fair value rate base analyses for Northern Indiana Public Service Company for several electric rate proceedings. Valuation approaches used in this project included income, cost and comparable sales approaches.



- Prepared an appraisal of a fleet of fossil generating assets for a large electric utility to establish the value of assets transferred from utility property.
- Conducted due diligence on an electric transmission and distribution system as part of a buy-side due diligence team.
- Provided analytical support for and prepared appraisal reports of generation assets to be used in ad valorem tax disputes.
- Provided analytical support and prepared testimony regarding the valuation of electric distribution system assets in five communities in a condemnation proceeding.
- Prepared Feasibility Reports analyzing the expected net benefits resulting from municipal ownership of investor-owned utility operations.
- Prepared independent analyses of proposal for the proposed government condemnation of the investor-owned utilities in the State of Maine and the formation of a Public Power District.
- Valued purchase power agreements in the transfer of assets to a deregulated electric market.

Strategic and Financial Advisory Services

Ms. Bulkley has assisted several clients across North America with analytically based strategic planning, due diligence and financial advisory services.

Representative projects include:

- Preparation of feasibility studies for bond issuances for municipal and district steam clients.
- Assisted in the development of a generation strategy for an electric utility. Analyzed various NERC regions to identify potential market entry points. Evaluated potential competitors and alliance partners. Assisted in the development of gas and electric price forecasts. Developed a framework for the implementation of a risk management program.
- Assisted clients in identifying potential joint venture opportunities and alliance partners. Contacted interviewed and evaluated potential alliance candidates based on company-established criteria for several LDCs and marketing companies. Worked with several LDCs and unregulated marketing companies to establish alliances to enter into the retail energy market. Prepared testimony in support of several merger cases and participated in the regulatory process to obtain approval for these mergers.
- Assisted clients in several buy-side due diligence efforts, providing regulatory insight and developing valuation recommendations for acquisitions of both electric and gas properties.



PROFESSIONAL HISTORY

Concentric Energy Advisors, Inc. (2002 – Present)

Senior Vice President

Vice President

Assistant Vice President

Project Manager

Navigant Consulting, Inc. (1995 – 2002)

Project Manager

Cahners Publishing Company (1995)

Economist

EDUCATION

Boston University

M.A., Economics, 1995

Simmons College

B.A., Economics and Finance, 1991

CERTIFICATIONS

Certified General Appraiser licensed in the Commonwealth of Massachusetts and the State of New Hampshire.



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Arizona Corporation Commission				
Southwest Gas Corporation	12/21	Southwest Gas Corporation	Docket No. G-01551A-21-0368	Return on Equity
Arizona Public Service Company	10/19	Arizona Public Service Company	Docket No. E-01345A-19-0236	Return on Equity
Tucson Electric Power Company	04/19	Tucson Electric Power Company	Docket No. E-01933A-19-0028	Return on Equity
Tucson Electric Power Company	11/15	Tucson Electric Power Company	Docket No. E-01933A-15-0322	Return on Equity
UNS Electric	05/15	UNS Electric	Docket No. E-04204A-15-0142	Return on Equity
UNS Electric	12/12	UNS Electric	Docket No. E-04204A-12-0504	Return on Equity
Arkansas Public Service Commission				
Oklahoma Gas and Electric Co	10/21	Oklahoma Gas and Electric Co	Docket No. D-18-046-FR	Return on Equity
Arkansas Oklahoma Gas Corporation	10/13	Arkansas Oklahoma Gas Corporation	Docket No. 13-078-U	Return on Equity
California Public Utilities Commission				
San Jose Water Company	05/21	San Jose Water Company	A2105004	Return on Equity
Colorado Public Utilities Commission				
Public Service Company of Colorado	07/21	Public Service Company of Colorado	21AL-0317E	Return on Equity
Public Service Company of Colorado	02/20	Public Service Company of Colorado	20AL-0049G	Return on Equity
Public Service Company of Colorado	05/19	Public Service Company of Colorado	19AL-0268E	Return on Equity
Public Service Company of Colorado	01/19	Public Service Company of Colorado	19AL-0063ST	Return on Equity
Atmos Energy Corporation	05/15	Atmos Energy Corporation	Docket No. 15AL-0299G	Return on Equity
Atmos Energy Corporation	04/14	Atmos Energy Corporation	Docket No. 14AL-0300G	Return on Equity
Atmos Energy Corporation	05/13	Atmos Energy Corporation	Docket No. 13AL-0496G	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Connecticut Public Utilities Regulatory Authority				
United Illuminating	05/21	United Illuminating	Docket No. 17-12-03RE11	Return on Equity
Connecticut Water Company	01/21	Connecticut Water Company	Docket No. 20-12-30	Return on Equity
Connecticut Natural Gas Corporation	06/18	Connecticut Natural Gas Corporation	Docket No. 18-05-16	Return on Equity
Yankee Gas Services Co. d/b/a Eversource Energy	06/18	Yankee Gas Services Co. d/b/a Eversource Energy	Docket No. 18-05-10	Return on Equity
The Southern Connecticut Gas Company	06/17	The Southern Connecticut Gas Company	Docket No. 17-05-42	Return on Equity
The United Illuminating Company	07/16	The United Illuminating Company	Docket No. 16-06-04	Return on Equity
Federal Energy Regulatory Commission				
Florida Gas Transmission	02/21	Florida Gas Transmission	Docket No. RP21-441	Return on Equity
TransCanyon	01/21	TransCanyon	Docket No. ER21-1065	Return on Equity
Duke Energy	12/20	Duke Energy	Docket No. EL21-9-000	Return on Equity
Wisconsin Electric Power Company	08/20	Wisconsin Electric Power Company	Docket No. EL20-57-000	Return on Equity
Panhandle Eastern Pipe Line Company, LP	10/19	Panhandle Eastern Pipe Line Company, LP	Docket Nos. RP19-78-000 RP19-78-001	Return on Equity
Panhandle Eastern Pipe Line Company, LP	08/19	Panhandle Eastern Pipe Line Company, LP	Docket Nos. RP19-1523	Return on Equity
Sea Robin Pipeline Company LLC	11/18	Sea Robin Pipeline Company LLC	Docket# RP19-352-000	Return on Equity
Tallgrass Interstate Gas Transmission	10/15	Tallgrass Interstate Gas Transmission	RP16-137	Return on Equity
Idaho Public Utilities Commission				
PacifiCorp d/b/a Rocky Mountain Power	05/21	PacifiCorp d/b/a Rocky Mountain Power	Case No. PAC-E-21-07	Return on Equity
Illinois Commerce Commission				



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
North Shore Gas Company	02/21	North Shore Gas Company	No. 20-0810	Return on Equity
Indiana Utility Regulatory Commission				
Indiana Michigan Power Co.	07/21	Indiana Michigan Power Co.	IURC Cause No. 45576	Return on Equity
Indiana Gas Company Inc.	12/20	Indiana Gas Company Inc.	IURC Cause No. 45468	Return on Equity
Southern Indiana Gas and Electric Company	10/20	Southern Indiana Gas and Electric Company	IURC Cause No. 45447	Return on Equity
Indiana and Michigan American Water Company	09/18	Indiana and Michigan American Water Company	IURC Cause No. 45142	Return on Equity
Indianapolis Power and Light Company	12/17	Indianapolis Power and Light Company	Cause No. 45029	Fair Value
Northern Indiana Public Service Company	09/17	Northern Indiana Public Service Company	Cause No. 44988	Fair Value
Indianapolis Power and Light Company	12/16	Indianapolis Power and Light Company	Cause No.44893	Fair Value
Northern Indiana Public Service Company	10/15	Northern Indiana Public Service Company	Cause No. 44688	Fair Value
Indianapolis Power and Light Company	09/15	Indianapolis Power and Light Company	Cause No. 44576 Cause No. 44602	Fair Value
Kokomo Gas and Fuel Company	09/10	Kokomo Gas and Fuel Company	Cause No. 43942	Fair Value
Northern Indiana Fuel and Light Company, Inc.	09/10	Northern Indiana Fuel and Light Company, Inc.	Cause No. 43943	Fair Value
Iowa Department of Commerce Utilities Board				
Iowa-American Water Company	08/20	Iowa-American Water Company	Docket No. RPU-2020-0001	Return on Equity
Kansas Corporation Commission				
Atmos Energy Corporation	08/15	Atmos Energy Corporation	Docket No. 16-ATMG-079-RTS	Return on Equity
Kentucky Public Service Commission				
Kentucky American Water Company	11/18	Kentucky American Water Company	Docket No. 2018-00358	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Maine Public Utilities Commission				
Central Maine Power	10/18	Central Maine Power	Docket No. 2018-194	Return on Equity
Maryland Public Service Commission				
Maryland American Water Company	06/18	Maryland American Water Company	Case No. 9487	Return on Equity
Massachusetts Appellate Tax Board				
Hopkinton LNG Corporation	03/20	Hopkinton LNG Corporation	Docket No.	Valuation of LNG Facility
FirstLight Hydro Generating Company	06/17	FirstLight Hydro Generating Company	Docket No. F-325471 Docket No. F-325472 Docket No. F-325473 Docket No. F-325474	Valuation of Electric Generation Assets
Massachusetts Department of Public Utilities				
National Grid USA	11/20	Boston Gas Company	DPU 20-120	Return on Equity
Berkshire Gas Company	05/18	Berkshire Gas Company	DPU 18-40	Return on Equity
Unitil Corporation	01/04	Fitchburg Gas and Electric	DTE 03-52	Integrated Resource Plan; Gas Demand Forecast
Michigan Public Service Commission				
Michigan Gas Utilities Corporation	03/21	Michigan Gas Utilities Corporation	Case No. U-20718	Return on Equity
Wisconsin Electric Power Company	12/11	Wisconsin Electric Power Company	Case No. U-16830	Return on Equity
Michigan Tax Tribunal				
New Covert Generating Co., LLC.	03/18	The Township of New Covert Michigan	MTT Docket No. 000248TT and 16-001888-TT	Valuation of Electric Generation Assets
Covert Township	07/14	New Covert Generating Co., LLC.	Docket No. 399578	Valuation of Electric Generation Assets
Minnesota Public Utilities Commission				
CenterPoint Energy Resources	11/21	CenterPoint Energy Resources	D-G-008/GR-21-435	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Allete, Inc. d/b/a Minnesota Power	11/21	Allete, Inc. d/b/a Minnesota Power	D-E-015/GR-21-630	Return on Equity
Otter Tail Power Company	11/20	Otter Tail Power Company	E017/GR-20-719	Return on Equity
Allete, Inc. d/b/a Minnesota Power	11/19	Allete, Inc. d/b/a Minnesota Power	E015/GR-19-442	Return on Equity
CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas	10/19	CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas	G-008/GR-19-524	Return on Equity
Great Plains Natural Gas Co.	09/19	Great Plains Natural Gas Co.	Docket No. G004/GR-19-511	Return on Equity
Minnesota Energy Resources Corporation	10/17	Minnesota Energy Resources Corporation	Docket No. G011/GR-17-563	Return on Equity
Missouri Public Service Commission				
Ameren Missouri	03/21	Ameren Missouri	Docket No. ER-2021-0240 Docket No. GR-2021-0241	Return on Equity
Missouri American Water Company	06/20	Missouri American Water Company	Case No. WR-2020-0344 Case No. SR-2020-0345	Return on Equity
Missouri American Water Company	06/17	Missouri American Water Company	Case No. WR-17-0285 Case No. SR-17-0286	Return on Equity
Montana Public Service Commission				
Montana-Dakota Utilities Co.	06/20	Montana-Dakota Utilities Co.	D2020.06.076	Return on Equity
Montana-Dakota Utilities Co.	09/18	Montana-Dakota Utilities Co.	D2018.9.60	Return on Equity
New Hampshire - Board of Tax and Land Appeals				
Public Service Company of New Hampshire d/b/a Eversource Energy	11/19 12/19	Public Service Company of New Hampshire d/b/a Eversource Energy	Master Docket No. 28873-14-15-16-17PT	Valuation of Utility Property and Generating Assets



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
New Hampshire Public Utilities Commission				
Public Service Company of New Hampshire	05/19	Public Service Company of New Hampshire	DE-19-057	Return on Equity
New Hampshire-Merrimack County Superior Court				
Northern New England Telephone Operations, LLC d/b/a FairPoint Communications, NNE	04/18	Northern New England Telephone Operations, LLC d/b/a FairPoint Communications, NNE	220-2012-CV-1100	Valuation of Utility Property
New Hampshire-Rockingham Superior Court				
Eversource Energy	05/18	Public Service Commission of New Hampshire	218-2016-CV-00899 218-2017-CV-00917	Valuation of Utility Property
New Jersey Board of Public Utilities				
Public Service Electric and Gas Company	10/20	Public Service Electric and Gas Company	EO18101115	Return on Equity
New Jersey American Water Company, Inc.	12/19	New Jersey American Water Company, Inc.	WR19121516	Return on Equity
Public Service Electric and Gas Company	04/19	Public Service Electric and Gas Company	EO18060629 GO18060630	Return on Equity
Public Service Electric and Gas Company	02/18	Public Service Electric and Gas Company	GR17070776	Return on Equity
Public Service Electric and Gas Company	01/18	Public Service Electric and Gas Company	ER18010029 GR18010030	Return on Equity
New Mexico Public Regulation Commission				
Southwestern Public Service Company	07/19	Southwestern Public Service Company	19-00170-UT	Return on Equity
Southwestern Public Service Company	10/17	Southwestern Public Service Company	Case No. 17-00255-UT	Return on Equity
Southwestern Public Service Company	12/16	Southwestern Public Service Company	Case No. 16-00269-UT	Return on Equity
Southwestern Public Service Company	10/15	Southwestern Public Service Company	Case No. 15-00296-UT	Return on Equity
Southwestern Public Service Company	06/15	Southwestern Public Service Company	Case No. 15-00139-UT	Return on Equity
New York State Department of Public Service				



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Corning Natural Gas Corporation	07/21	Corning Natural Gas Corporation	Case No. 21-G-0394	Return on Equity
Central Hudson Gas and Electric Corporation	08/20	Central Hudson Gas and Electric Corporation	Electric 20-E-0428 Gas 20-G-0429	Return on Equity
Niagara Mohawk Power Corporation	07/20	National Grid USA	Case No. 20-E-0380 20-G-0381	Return on Equity
Corning Natural Gas Corporation	02/20	Corning Natural Gas Corporation	Case No. 20-G-0101	Return on Equity
New York State Electric and Gas Company Rochester Gas and Electric	05/19	New York State Electric and Gas Company Rochester Gas and Electric	19-E-0378 19-G-0379 19-E-0380 19-G-0381	Return on Equity
Brooklyn Union Gas Company d/b/a National Grid NY KeySpan Gas East Corporation d/b/a National Grid	04/19	Brooklyn Union Gas Company d/b/a National Grid NY KeySpan Gas East Corporation d/b/a National Grid	19-G-0309 19-G-0310	Return on Equity
Central Hudson Gas and Electric Corporation	07/17	Central Hudson Gas and Electric Corporation	Electric 17-E-0459 Gas 17-G-0460	Return on Equity
Niagara Mohawk Power Corporation	04/17	National Grid USA	Case No. 17-E-0238 17-G-0239	Return on Equity
Corning Natural Gas Corporation	06/16	Corning Natural Gas Corporation	Case No. 16-G-0369	Return on Equity
National Fuel Gas Company	04/16	National Fuel Gas Company	Case No. 16-G-0257	Return on Equity
KeySpan Energy Delivery	01/16	KeySpan Energy Delivery	Case No. 15-G-0058 Case No. 15-G-0059	Return on Equity
New York State Electric and Gas Company Rochester Gas and Electric	05/15	New York State Electric and Gas Company Rochester Gas and Electric	Case No. 15-E-0283 Case No. 15-G-0284 Case No. 15-E-0285 Case No. 15-G-0286	Return on Equity
North Dakota Public Service Commission				
Montana-Dakota Utilities Co.	08/20	Montana-Dakota Utilities Co.	C-PU-20-379	Return on Equity
Northern States Power Company	12/12	Northern States Power Company	C-PU-12-813	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Northern States Power Company	12/10	Northern States Power Company	C-PU-10-657	Return on Equity
Oklahoma Corporation Commission				
Arkansas Oklahoma Gas Corporation	01/13	Arkansas Oklahoma Gas Corporation	Cause No. PUD 201200236	Return on Equity
Oregon Public Service Commission				
PacifiCorp d/b/a Pacific Power & Light	02/20	PacifiCorp d/b/a Pacific Power & Light	Docket No. UE-374	Return on Equity
Pennsylvania Public Utility Commission				
American Water Works Company Inc.	04/20	Pennsylvania-American Water Company	Docket No. R-2020-3019369 (water) Docket No. R-2020-3019371 (wastewater)	Return on Equity
American Water Works Company Inc.	04/17	Pennsylvania-American Water Company	Docket No. R-2017-2595853	Return on Equity
South Dakota Public Utilities Commission				
Northern States Power Company	06/14	Northern States Power Company	Docket No. EL14-058	Return on Equity
Texas Public Utility Commission				
Southwestern Public Service Commission	08/19	Southwestern Public Service Commission	Docket No. D-49831	Return on Equity
Southwestern Public Service Company	01/14	Southwestern Public Service Company	Docket No. 42004	Return on Equity
Utah Public Service Commission				
PacifiCorp d/b/a Rocky Mountain Power	05/20	PacifiCorp d/b/a Rocky Mountain Power	Docket No. 20-035-04	Return on Equity
Virginia State Corporation Commission				
Virginia American Water Company, Inc.	11/21	Virginia American Water Company, Inc.	Docket No. PUR-2021-00255	Return on Equity
Virginia American Water Company, Inc.	11/18	Virginia American Water Company, Inc.	Docket No. PUR-2018-00175	Return on Equity
Washington Utilities Transportation Commission				
Cascade Natural Gas Corporation	06/20	Cascade Natural Gas Corporation	Docket No. UG-200568	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
PacifiCorp d/b/a Pacific Power & Light	12/19	PacifiCorp d/b/a Pacific Power & Light	Docket No. UE-191024	Return on Equity
Cascade Natural Gas Corporation	04/19	Cascade Natural Gas Corporation	Docket No. UG-190210	Return on Equity
West Virginia Public Service Commission				
West Virginia American Water Company	04/21	West Virginia American Water Company	Case No. 21-02369-W-42T	Return on Equity
West Virginia American Water Company	04/18	West Virginia American Water Company	Case No. 18-0573-W-42T Case No. 18-0576-S-42T	Return on Equity
Wisconsin Public Service Commission				
Wisconsin Electric Power Company and Wisconsin Gas LLC	03/19	Wisconsin Electric Power Company and Wisconsin Gas LLC	Docket No. 05-UR-109	Return on Equity
Wisconsin Public Service Corp.	03/19	Wisconsin Public Service Corp.	6690-UR-126	Return on Equity
Wyoming Public Service Commission				
PacifiCorp d/b/a Rocky Mountain Power	03/20	PacifiCorp d/b/a Rocky Mountain Power	Docket No. 20000-578-ER-20	Return on Equity
Montana-Dakota Utilities Co.	05/19	Montana-Dakota Utilities Co.	30013-351-GR-19	Return on Equity