Exhibit No.: Issue(s): Witness: Sponsoring Party: MoPSC Staff Type of Exhibit: Case No.: Date Testimony Prepared:

Rate of Return and Capital Structure Dave Murray, CFA Surrebuttal Testimony WR-2018-0170 August 3, 2018

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

FINANCIAL ANALYSIS DEPARTMENT

SURREBUTTAL TESTIMONY

OF

DAVID MURRAY, CFA

LIBERTY UTILITIES (MISSOURI WATER) LLC, d/b/a LIBERTY UTILITIES

CASE NO. WR-2018-0170

Jefferson City, Missouri August 2018

1		SURREBUTTAL TESTIMONY
2		OF
3		DAVID MURRAY, CFA
4 5		LIBERTY UTILITIES (MISSOURI WATER) LLC, d/b/a LIBERTY UTILITIES
6		CASE NO. WR-2018-0170
7	Q.	What is your name?
8	А.	My name is David Murray.
9	Q.	Are you the same David Murray who sponsored the Rate of Return (ROR)
10	used to esta	blish the revenue requirement contained in Staff's Review and Audit of
11	Liberty Utilities (Missouri Water) LLC, d/b/a Liberty Utilities (hereinafter referred to as	
12	"Liberty Water"), June 22, 2018 ("Staff Audit"), which was attached to Staff witness Paul R.	
13	Harrison's Direct Testimony filed as of the same date?	
14	А.	Yes.
15	Q.	Are you the same David Murray who sponsored Rebuttal Testimony in
16	this case?	
17	А.	Yes.
18	Q.	What is the purpose of your Surrebuttal Testimony?
19	А.	To respond to William G. Stannard's Rebuttal Testimony as it relates to a fair
20	and reasonable ROE to authorize Liberty Water. Mr. Stannard sponsored testimony on behalf	
21	of Silverleaf Resorts Inc. and Orange Lake Country Club, Inc.	
22	Q.	What is Mr. Stannard's recommended allowed ROE in his
23	Rebuttal Testimony?	
24	А.	Mr. Stannard identified a range of 8% to 9%.

Surrebuttal Testimony of David Murray, CFA

What is the basis for Mr. Stannard's recommendation? 1 Q. 2 A. Mr. Stannard adds Duff & Phelps' estimated equity risk premium of 5% to a 3 spot 30-year Treasury yield of 2.97% to estimate a required return on common equity of 4 approximately 8%. Mr. Stannard then adds 100 basis points to this base to allow for a range 5 of 8% to 9%.

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Q. Is Duff & Phelps an authoritative source as it relates to estimating the cost of capital?

8 A. Yes. Staff consistently relies on this source for purposes of testing the 9 reasonableness of its own cost of equity estimates. Duff & Phelps publishes a comprehensive 10 amount of data that assists financial analysts with estimating the cost of capital. Duff & 11 Phelps assesses equity risk premium estimates derived using varietv a of 12 methods/sources/data, such as historical earned return spreads between stocks and bonds and 13 implied equity risk premiums estimated by various authoritative sources, such as academics 14 and investors.

15

Q. Does Mr. Stannard apply Duff & Phelps' suggested equity risk premium as Duff & Phelps' intends it to be applied? 16

17 No. Mr. Stannard applies the equity risk premium to a spot 30-year Treasury A. 18 yield. Duff & Phelp's equity risk premium estimate is conditioned on a "normalized" 19 risk-free rate of 3.5%. Adding the 5% conditional equity risk premium to this yield results in 20 a market cost of equity of 8.5%.

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Q. Did Mr. Stannard leave out a step to adjust the equity risk premium to reflect the fact that utility stocks are less volatile than the broader markets?

Surrebuttal Testimony of David Murray, CFA

A. Yes. Utility stocks are less volatile than the broader market. This lower
volatility is typically measured by calculating the beta of utility stocks. Typically, betas of
utilities are in the range of 0.6 to 0.8. Applying a typical utility beta of 0.7 to the market risk
premium of 5%, results in an industry adjusted risk premium of 3.5%. Adding this 3.5%
adjusted risk premium to Duff & Phelp's normalized risk-free rate of 3.5% results in a cost of
equity of 7%.

Q. If using authoritative sources in conjunction with widely-accepted cost of
equity methods implies a cost of equity of 7%, why did you recommend a 10% allowed ROE
for both Liberty Water and Liberty Midstates?

10 A. Because I am using the Commission's previous decisions as guidance as to a 11 fair and reasonable allowed ROE, giving its most recent allowed ROE of 9.8% in the 12 Spire Missouri gas rate cases, Case Nos. GR-2017-0216 and GR-2017-0217, the most weight. 13 Being that Liberty Water has a more leveraged capital structure than that authorized 14 Spire Missouri, Staff recommended a 20 basis point increase to the allowed ROE. Staff 15 quantified the 20 basis point adjustment by evaluating recent spreads between 'BBB' rated 16 bonds and 'A' rated bonds. For more detail, please see pages 47-48 of my "Detailed Direct 17 Testimony" filed in the Liberty Midstates rate case.

- 18
- Q. Does this conclude your Surrebuttal Testimony?
- 19
- A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In The Matter of the Application of Rate Increase for Liberty Utilities (Missouri Water), LLC d/b/a **Liberty Utilities**

Case No. WR-2018-0170

AFFIDAVIT OF DAVID MURRAY, CFA

State of Missouri)) ss County of Cole)

COMES NOW David Murray, CFA, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing Surrebuttal Testimony; and that the same is true and correct according to his best knowledge and belief. Further the Affiant sayeth not.

David Murray, CFA

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JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this $\underline{2^{M}}$ day of August, 2018.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070

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