Exhibit No. \_\_\_\_\_ Issue: Cost of Capital Witness: Dylan W. D'Ascendis Type of Exhibit: Direct Testimony Sponsoring Party: Confluence Rivers Case No.: WR-2023-0006/SR-2023-0007 Date: December 19, 2022

### BEFORE THE

### MISSOURI PUBLIC SERVICE COMMISSION

DIRECT TESTIMONY

OF

DYLAN W. D'ASCENDIS PARTNER SCOTTMADDEN, INC.

### ON BEHALF OF

CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.

December 19, 2022

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#### 1 I. INTRODUCTION

8

- 2 A. WITNESS IDENTIFICATION
- 3 Q. Please state your name and business address.
- A. My name is Dylan W. D'Ascendis. My business address is 3000 Atrium Way, Suite
  200, Mount Laurel, NJ 08054.
- 6 Q. By whom are you employed and in what capacity?
- 7 A. I am a Partner at ScottMadden, Inc.

#### B. BACKGROUND AND QUALIFICATIONS

9 Q. Please summarize your professional experience and educational
 10 background.

A. I have offered expert testimony on behalf of investor-owned utilities in over 35 state
 regulatory commissions in the United States, the Federal Energy Regulatory
 Commission, the Alberta Utility Commission, one American Arbitration Association
 panel, and the Superior Court of Rhode Island on issues including, but not limited
 to, common equity cost rate, rate of return, valuation, capital structure, class cost
 of service, and rate design.

On behalf of the American Gas Association ("AGA"), I calculate the AGA Gas Index, which serves as the benchmark against which the performance of the American Gas Index Fund ("AGIF") is measured on a monthly basis. The AGA Gas Index and AGIF are a market capitalization-weighted index and mutual fund, respectively, comprised of the common stocks of the publicly traded corporate members of the AGA.

I am a member of the Society of Utility and Regulatory Financial Analysts
 ("SURFA"). In 2011, I was awarded the professional designation "Certified Rate

- of Return Analyst" by SURFA, which is based on education, experience, and the
   successful completion of a comprehensive written examination.
- I am also a member of the National Association of Certified Valuation
   Analysts ("NACVA") and was awarded the professional designation "Certified
   Valuation Analyst" by the NACVA in 2015.
- I am a graduate of the University of Pennsylvania, where I received a
   Bachelor of Arts degree in Economic History. I have also received a Master of
   Business Administration with high honors and concentrations in Finance and
   International Business from Rutgers University.
- The details of my educational background and expert witness appearances
   are included in Appendix A.
- 12 **II.**

#### PURPOSE OF TESTIMONY

#### 13 Q. What is the purpose of your Direct Testimony in this proceeding?

A. The purpose of my Direct Testimony is to present evidence on behalf of
 Confluence Rivers Utility Operating Company, Inc. ("Confluence Rivers" or the
 "Company") about the appropriate capital structure and corresponding cost rates
 the Company should be given the opportunity to earn on its jurisdictional rate base.

18 Q. Have you prepared any Schedules in support of your recommendation?

- A. Yes. I have prepared Schedules DWD-1 through DWD-9, which have been
   prepared by me or under my direct supervision.
- 21 Q. What is your recommended cost of capital for Confluence Rivers?
- A. I recommend the Missouri Public Service Commission ("MPSC" or the "Commission") authorize the Company the opportunity to earn an overall rate of return of 9.86% based on the actual capital structure of Confluence Rivers, which

consists of 31.44% long-term debt at an embedded cost rate of 6.60%, and 68.56%
common equity at my recommended return on common equity ("ROE") of 11.35%.
The overall rate of return is summarized on page 1 of Schedule DWD-1 and in
Table 1 below:

5

#### Table 1: Summary of Overall Rate of Return

Type of Capital	Ratios	Cost Rate	Weighted Cost Rate
Long-Term Debt	31.44%	6.60%	2.08%
Common Equity	<u>68.56%</u>	11.35%	<u>7.78%</u>
Total	<u>100.00%</u>		<u>9.86%</u>

#### 6 III. <u>SUMMARY</u>

#### 7 Q. Please summarize your recommended common equity cost rate.

My recommended common equity cost rate of 11.35% is summarized on page 2 8 Α. of Schedule DWD-1. I have assessed the market-based common equity cost rates 9 of companies of relatively similar, but not necessarily identical, risk to Confluence 10 Rivers. Using companies of relatively comparable risk as proxies is consistent with 11 the principles of fair rate of return established in the Hope<sup>1</sup> and Bluefield<sup>2</sup> Supreme 12 Court cases. No proxy group can be identical in risk to any single company, so 13 there must be an evaluation of relative risk between the company and the proxy 14 group to see if it is appropriate to make adjustments to the proxy group's indicated 15 rate of return. 16

17

18

My recommendation results from the application of several cost of common equity models, specifically the Discounted Cash Flow ("DCF") model, the Risk

<sup>&</sup>lt;sup>1</sup> Federal Power Commission v. Hope Natural Gas Co., 320 U.S. 591 (1944). ("Hope")

<sup>&</sup>lt;sup>2</sup> Bluefield Water Works Improvement Co. v. Public Serv. Comm'n, 262 U.S. 679 (1922). ("Bluefield")

Premium Model ("RPM"), and the Capital Asset Pricing Model ("CAPM"), to the
market data of a proxy group of six water companies ("Utility Proxy Group") whose
selection criteria will be discussed below. In addition, I also applied the DCF, RPM,
and CAPM to a proxy group of domestic, non-price regulated companies
comparable in total risk to the Utility Proxy Group ("Non-Price Regulated Proxy
Group").

The results derived from each are as follows:

7 8

9

### Table 2: Summary of Common Equity Cost Rate

Discounted Cash Flow Model	9.73%
Risk Premium Model	11.84%
Capital Asset Pricing Model	12.00%
Market Models Applied to Comparable Risk, Non-Price Regulated Companies	<u>11.97%</u>
Indicated Range of Common Equity Cost Rates Before Adjustments for Company-Specific Risk	10.36% - 11.36%
Business Risk Adjustment	1.00%
Financial Risk Adjustment	<u>-0.51%</u>
Indicated Range of Common Equity Cost Rates after Adjustment	<u> 10.85% – 11.85%</u>
Recommended Cost of Common Equity	<u>11.35%</u>

10	After analyzing the indicated common equity cost rates derived through
11	these models, the indicated range of common equity cost rates applicable to the
12	Utility Proxy Group is between 10.36% and 11.36%. <sup>3</sup>

<sup>&</sup>lt;sup>3</sup> The indicated range is equal to 50 basis points above and below the midpoint of my four model results.

The indicated range of common equity cost rates applicable to the Utility 1 Proxy Group was then adjusted upward by 1.00%, and downward by 0.51%, to 2 3 reflect Confluence Rivers' greater business risk, and lesser financial risk, respectively, relative to the Utility Proxy Group. These adjustments result in a 4 Company-specific range of common equity cost rates between 10.85% and 5 11.85%. From this range of results, I recommend the Commission consider a 6 common equity cost rate of 11.35%, or the approximate midpoint, for use in setting 7 rates for the Company. 8

9

#### IV. <u>GENERAL PRINCIPLES</u>

Q. What general principles have you considered in arriving at your
 recommended common equity cost rate of 11.35%?

Α. In unregulated industries, the competition of the marketplace is the principal 12 determinant of the price of products or services. For regulated public utilities, 13 regulation must act as a substitute for marketplace competition. Assuring that the 14 utility can provide safe and reliable service at all times to their customers requires 15 a level of earnings sufficient to maintain the integrity of presently invested capital. 16 Sufficient earnings also permit the attraction of needed new capital at a reasonable 17 cost, for which the utility must compete with other firms of comparable risk, 18 19 consistent with the fair rate of return standards established by the U.S. Supreme Court in the previously cited *Hope* and *Bluefield* decisions. The U.S. Supreme 20 Court affirmed the fair rate of return standards in *Hope*, when it stated: 21

The rate-making process under the Act, i.e., the fixing of 'just and reasonable' rates, involves a balancing of the investor and the consumer interests. Thus we stated in the Natural Gas Pipeline Co. case that 'regulation does not insure [sic] that the business shall produce net revenues.' 315 U.S. at

page 590, 62 S.Ct. at page 745. But such considerations 1 2 aside, the investor interest has a legitimate concern with the 3 financial integrity of the company whose rates are being regulated. From the investor or company point of view it is 4 5 important that there be enough revenue not only for operating expenses but also for the capital costs of the business. These 6 7 include service on the debt and dividends on the stock. Cf. Chicago & Grand Trunk R. Co. v. Wellman, 143 U.S. 339, 345, 8 346 12 S.Ct. 400, 402. By that standard the return to the 9 equity owner should be commensurate with returns on 10 investments in other enterprises having corresponding risks. 11 That return, moreover, should be sufficient to assure 12 confidence in the financial integrity of the enterprise, so as to 13 maintain its credit and to attract capital.<sup>4</sup> 14

In summary, the U.S. Supreme Court has found a return that is adequate to 15 attract capital at reasonable terms enables the utility to provide service while 16 17 maintaining its financial integrity. As discussed above, and in keeping with established regulatory standards, that return should be commensurate with the 18 returns expected elsewhere for investments of corresponding risk. The 19 20 Commission's decision in this proceeding, therefore, should provide the Company with the opportunity to earn a return that is: 1) adequate to attract capital at 21 reasonable cost and terms; 2) sufficient to ensure its financial integrity; and 3) 22 commensurate with returns on investments in enterprises having corresponding 23 risks. 24

In addition, the required return for a regulated public utility is established on a stand-alone basis, *i.e.*, for the utility operating company at issue in a rate case. Parent entities, like other investors, have capital constraints and must look at the attractiveness of the expected risk-adjusted return of each investment alternative in their capital budgeting process. That is, utility holding companies that own many

Hope, 320 U.S. 591 (1944), at 603.

utility operating companies have choices as to where they will invest their limited
 capital within the holding company family. Therefore, the opportunity cost concept
 applies regardless of whether the funding source is public or corporate.

When funding is provided by a parent entity, the return still must be sufficient 4 to provide an incentive to allocate equity capital to the subsidiary or business unit 5 rather than other internal or external investment opportunities. That is, the 6 regulated subsidiary must compete for capital with all the parent company's 7 affiliates, and with other similar risk companies, which may include non-utilities. In 8 that regard, investors value corporate entities on a sum-of-the-parts basis and 9 expect each division within the parent company to provide an appropriate risk-10 11 adjusted return.

It, therefore, is important that the authorized ROE for the Company reflects
 the risks and prospects of its operations and supports its financial integrity from a
 stand-alone perspective.

Q. Within that broad framework, how is the cost of capital estimated in
 regulatory proceedings?

A. Regulated utilities primarily use common stock and long-term debt to finance their
 permanent property, plant, and equipment (*i.e.*, rate base). The fair rate of return
 for a regulated utility is based on its weighted average cost of capital, in which, as
 noted earlier, the costs of the individual sources of capital are weighted by their
 respective book values.

The cost of capital is the return investors require to make an investment in a firm. Investors will provide funds to a firm only if the return that they *expect* is

equal to, or greater than, the return that they *require* to accept the risk of providing
funds to the firm.

3 The cost of capital (that is, the combination of the costs of debt and equity) is based on the economic principle of "opportunity costs." The principle of 4 opportunity costs recognizes that investing in any asset (whether debt or equity 5 securities) represents a forgone opportunity to invest in alternative assets. For any 6 investment to be sensible, its expected return must be at least equal to the return 7 expected on alternative investment opportunities with comparable risks. Because 8 investments with like risks should offer similar returns, the opportunity cost of an 9 investment should equal the return available on an investment of comparable risk. 10

The cost of debt is contractually defined and can be directly observed as the interest rate or yield on debt securities. However, the cost of equity must be estimated based on market data and various financial models. Because the cost of equity is premised on opportunity costs, the models used to determine it are typically applied to a group of "comparable" or "proxy" companies.

In the end, the estimated cost of capital should reflect the return that investors require in light of the subject company's business and financial risks, and the returns available on comparable investments.

19

#### A. BUSINESS RISK

20 **Q.** Please define business risk and explain why it is important to the 21 determination of a fair rate of return.

A. Business risk is the riskiness of a company's common stock without the use of debt and/or preferred capital. Examples of such <u>general</u> business risks faced by all utilities (*i.e.*, electric, natural gas distribution, and water) include size, the quality

- of management, the regulatory environment in which utilities operate, customer
   mix and concentration of customers, service territory growth, and capital intensity.
   All of these have a direct bearing on earnings.
- Consistent with the basic financial principle of risk and return, business risk
  is important to the determination of a fair rate of return, because the higher the
  level of risk, the higher the rate of return investors demand.

7 Q. What business risks do the water and wastewater industries face in general?

- Α. Water and wastewater utilities have an ever-increasing responsibility to be 8 stewards of the environment from which water supplies are drawn in order to 9 preserve and protect essential natural resources of the United States. This 10 11 increased environmental stewardship is a direct result of compliance with the Safe Drinking Water Act, as well as a response to continuous monitoring by the 12 Environmental Protection Agency and state and local governments, of the water 13 14 supply for potential contaminants and their resultant regulations. This, plus aging infrastructure, necessitate additional capital investment in the distribution and 15 treatment of water, exacerbating the pressure on free cash flows arising from 16 increased capital expenditures for infrastructure repair and replacement. The 17 significant amount of capital investment and, hence, high capital intensity, is a 18 major risk factor for the water and wastewater utility industry. 19
- 20

Value Line Investment Survey ("Value Line") observes the following about

21 the water utility industry:

Just about every company in the [Water Utility] Industry has been busy replacing old pipelines. For decades, most water utilities did not invest the funds required to modernize their systems. Water utilities and regulators were both satisfied in keeping customers' monthly bills low. When compared to other utilities' bills, such as electric, gas, and cable, water was

relatively cheap. There was a long-term cost to this lack of capital expenditures. In the earlier part of the 21<sup>st</sup> century, as water started to become more of a scarcer commodity, water districts became alarmed when they realized how much water was being lost because of old leaky pipes. Since then, the industry has been investing heavily to fix the problem. The replacement process will likely take decades to complete.<sup>5</sup>

The water and wastewater industry also experiences low depreciation rates. 8 Depreciation rates are one of the principal sources of internal cash flows for all 9 10 utilities (through a utility's depreciation expense) and are vital for a company to fund ongoing replacements and repairs of water and wastewater systems. 11 Water/wastewater utility assets have long lives, and therefore have long capital 12 recovery periods. As such, they face greater risk due to inflation, which results in 13 a higher replacement cost per dollar of net plant. Simply, capital that is retiring 14 today will need to be replaced with capital which is significantly more expensive. 15

Substantial capital expenditures, as noted by Value Line, will require 16 significant financing. The three sources of financing typically used are debt, equity 17 18 (common and preferred), and cash flow. All three are intricately linked to the opportunity to earn a sufficient rate of return as well as the ability to achieve that 19 return. Consistent with Hope and Bluefield, the return must be sufficient to 20 21 maintain credit quality as well as enable the attraction of necessary new capital, be it debt or equity capital. If unable to raise debt or equity capital, the utility must 22 turn to either retained earnings or free cash flow,<sup>6</sup> both of which are directly linked 23 to earning a sufficient rate of return. The level of free cash flow represents a utility's 24 25 ability to meet the needs of its debt and equity holders. If either retained earnings

<sup>&</sup>lt;sup>5</sup> Value Line Investment Survey, October 7, 2022.

<sup>&</sup>lt;sup>6</sup> Free Cash Flow = Operating Cash Flow (Funds From Operations) minus Capital Expenditures.

or free cash flow is inadequate, it will be nearly impossible for the utility to attract
 the needed capital for new infrastructure investment necessary to ensure quality
 service to its customers. An insufficient rate of return can be financially devastating
 for utilities as well as a public safety issue for their customers.

5 The water and wastewater utility industry's high degree of capital intensity 6 and low depreciation rates, coupled with the need for substantial infrastructure 7 capital spending, require regulatory support in the form of adequate and timely rate 8 relief, and in particular, a sufficient authorized return on common equity, so that 9 the industry can successfully meet the challenges it faces.

10

#### B. <u>FINANCIAL RISK</u>

11 Q. Please define financial risk and explain why it is important to the 12 determination of a fair rate of return.

A. Financial risk is the additional risk created by the introduction of debt and preferred stock into the capital structure. The higher the proportion of debt and preferred stock in the capital structure, the higher the financial risk (*i.e.,* likelihood of default). Therefore, consistent with the basic financial principle of risk and return, investors demand a higher common equity return as compensation for bearing higher default risk.

# Q. Can bond and credit ratings be a proxy for the combined business and financial risk (*i.e.*, investment risk of an enterprise)?

A. Yes, similar bond ratings/issuer credit ratings reflect, and are representative of, similar combined business and financial risks (*i.e.*, total risk) faced by bond

investors.<sup>7</sup> Although specific business or financial risks may differ between
 companies, the same bond/credit rating indicates that the combined risks are
 roughly similar, albeit not necessarily equal, as the purpose of the bond/credit
 rating process is to assess credit quality or credit risk (i.e., the risk of the company
 not paying its outstanding debt), and not common equity risk (i.e., the risk of the
 company not paying its outstanding debt, nor compensating its equity investors).

# 7 Q. That being said, do rating agencies reflect company size in their bond 8 ratings?

9 A. No. Neither S&P nor Moody's have minimum company size requirements for any
 given rating level. This means, all else equal, a relative size analysis needs to be
 conducted for companies with similar bond ratings.

#### 12 V. CONFLUENCE RIVERS AND THE UTILITY PROXY GROUP

#### 13 Q. Are you familiar with the operations of Confluence Rivers?

- A. Yes. Confluence Rivers is headquartered in St. Louis, Missouri, and provides
   service to 68 water and sewer service areas, representing approximately 7,999
- 16 wastewater connections and water connections.<sup>8</sup>

### 17 Q. Why is it necessary to develop a proxy group when estimating the ROE for

- 18 the Company?
- 19 A. Because the Company is not publicly traded and does not have publicly traded
- 20 equity securities, it is necessary to develop groups of publicly traded, comparable
- companies to serve as "proxies" for the Company. In addition to the analytical

<sup>&</sup>lt;sup>7</sup> Risk distinctions within S&P's bond rating categories are recognized by a plus or minus, i.e., within the A category, an S&P rating can be at A+, A, or A-. Similarly, risk distinctions for Moody's ratings are distinguished by numerical rating gradations, i.e., within the A category, a Moody's rating can be A1, A2 and A3.

<sup>&</sup>lt;sup>8</sup> Source: See Direct Testimony of Brent Thies.

necessity of doing so, the use of proxy companies is consistent with the *Hope* and
 *Bluefield* comparable risk standards, as discussed above. I have selected a proxy
 group that, in my view, is fundamentally risk-comparable to the Company.

Even when proxy groups are carefully selected, it is common for analytical 4 results to vary from company to company. Despite the care taken to ensure 5 comparability, because no two companies are identical, market expectations 6 regarding future risks and prospects will vary within the proxy group. It therefore 7 is common for analytical results to reflect a seemingly wide range, even for a group 8 of similarly situated companies. At issue is how to estimate the ROE for the target 9 company from within that range. That determination will be best informed by 10 employing a variety of sound analyses and necessarily must consider the sort of 11 guantitative and gualitative information discussed throughout my Direct Testimony. 12 Additionally, a relative risk analysis between the Company and the Utility Proxy 13 14 Group must be made to determine whether explicit Company-specific adjustments need to be made to the Utility Proxy Group's indicated results. 15

My analyses are based on the Utility Proxy Group, containing U.S. water utilities. As discussed earlier, utilities must compete for capital with other companies with commensurate risk (including non-utilities) and, to do so, must be provided the opportunity to earn a comparable return to these companies having a commensurate risk. Consequently, it is appropriate to consider the Utility Proxy Group's market data in determining the Company's ROE.

22 Q. Please explain how you chose your Utility Proxy Group.

A. The basis of selection for the Utility Proxy Group was to select those companies
 which meet the following criteria:

- 1 (i) They are included in the Water Utility Group of Value Line's Standard 2 Edition (October 7, 2022);
- 3 (ii) They have 60% or greater of 2021 total operating income or 60% or greater
   4 of 2021 total assets attributable to regulated water operations;
- (iii) At the time of preparation of this testimony, they had not publicly announced
  that they were involved in any major merger or acquisition activity (*i.e.*, one
  publicly traded utility merging with or acquiring another);
- 8 (iv) They have not cut or omitted their common dividends during the five years 9 ending 2021 or through the time of the preparation of this testimony;
- (v) They have *Value Line* and Bloomberg Professional Services ("Bloomberg")
   adjusted Beta coefficients ("beta");
- (vi) They have a positive *Value Line* five-year dividends per share ("DPS")
   growth rate projection; and
- (vii) They have *Value Line*, Zacks or Yahoo! Finance five-year earnings per
   share ("EPS") growth rate projections.
- 16 The following six companies met these criteria: American States Water
- 17 Company, American Water Works Company, Inc., California Water Service Group,
- 18 Essential Utilities Inc., Middlesex Water Company, and SJW Group.
- 19 Q. Please describe Schedule DWD-2, page 1.
- A. Page 1 of Schedule DWD-2 contains comparative capitalization and financial
   statistics for the Utility Proxy Group identified above for the years 2017 to 2021.
   During the five-year period ending 2021, the historically achieved earnings rate on
   book common equity for the group averaged 10.40%. The average common equity

- ratio based on total permanent capital (excluding short-term debt) was 51.78%,
   and the average dividend payout ratio was 59.46%.
- Total debt to earnings before interest, taxes, depreciation, and amortization for the years 2017 to 2021 ranges between 3.48x and 5.92x, with an average of 4.88x. Funds from operations to total debt range from 11.39% to 23.56%, with an average of 16.75%.

#### 7 VI. <u>CAPITAL STRUCTURE</u>

8 Q. What capital structure ratio do you recommend be employed in developing

9 an overall fair rate of return appropriate for the Company in this proceeding?

- 10 A. I recommend the Commission authorize the Company's actual capital structure
- consisting of 31.44% long-term debt and 68.56% common equity.
- 12 Q. What are the typical sources of capital commonly considered in establishing
- 13 a utility's capital structure?
- A. Common equity and long-term debt are commonly considered in establishing a
   utility's capital structure because they are the typical sources of capital financing a
   utility's rate base.
- 17 Q. Please explain.
- A. Long-lived assets are typically financed with long-lived securities, so that the overall term structure of the utility's long-term liabilities (both debt and equity) closely match the life of the assets being financed. As stated by Brigham and Houston:
- 22In practice, firms don't finance each specific asset with a type23of capital that has a maturity equal to the asset's life.24However, academic studies do show that most firms tend to

finance short-term assets from short-term sources and longterm assets from long-term sources.<sup>9</sup>

1 2

3 Whereas short-term debt has a maturity of one year or less, long-term debt may have maturities of 30 years or longer. Although there are practical financing 4 constraints, such as the need to "stagger" long-term debt maturities, the general 5 6 objective is to extend the average life of long-term debt. Still, long-term debt has a finite life, which is likely to be less than the life of the assets included in rate base. 7 Common equity, on the other hand is outstanding into perpetuity. Thus, common 8 equity more accurately matches the life of the going concern of the utility, which is 9 also assumed to operate in perpetuity. Consequently, it is both typical and 10 important for utilities to have significant proportions of common equity in their 11 capital structures. 12

Q. Why is it important for Confluence Rivers' actual capital structure,
 consisting of 31.44% long-term debt and 68.56% common equity, be
 authorized in this proceeding?

A. In order to provide safe, reliable, and affordable service to its customers,
 Confluence Rivers must meet the needs and serve the interests of its various
 stakeholders, including customers, shareholders, and bondholders. The interests
 of these stakeholder groups are aligned with maintaining a healthy balance sheet,
 strong credit ratings, and a supportive regulatory environment, so that the
 Company has access to capital on reasonable terms in order to make necessary
 investments.

<sup>&</sup>lt;sup>9</sup> Eugene F. Brigham and Joel F. Houston, <u>Fundamentals of Financial Management</u>, Concise 4<sup>th</sup> Ed., Thomson South-Western, 2004, at 574.

Safe and reliable service cannot be maintained at a reasonable cost if 1 utilities do not have the financial flexibility and strength to access the competitive 2 3 markets on reasonable terms. The authorization of a capital structure other than the Company's actual capital structure will weaken its financial condition and 4 adversely impact the Company's ability to address expenses and investment, to 5 the detriment of customers and shareholders. Safe and reliable service for 6 customers cannot be sustained over the long term if the interests of shareholders 7 and bondholders are minimized such that the public interest is not optimized. 8

9 Q. How does the regulatory environment in which a utility operates affect its
 10 access to, and cost of, capital?

The regulatory environment can significantly affect both the access to, and cost of, 11 Α. capital in several ways. The proportion and cost of debt capital available to utility 12 companies are both influenced, in large part, by the rating agencies' assessment 13 of the regulatory environment. In other words, the Company's credit rating and 14 outlook depend substantially on the extent to which rating agencies view the 15 regulatory environment as credit supportive, or not. In fact, Moody's finds the 16 regulatory environment to be so important that 50.00% of the factors that weigh in 17 the Company's ratings determination are dependent on the nature of regulation.<sup>10</sup> 18

- 19 Similarly, S&P has noted that:
- 20The regulatory framework/regime's influence is of critical21importance when assessing regulated utilities' credit risk22because it defines the environment in which a utility operates

<sup>&</sup>lt;sup>10</sup> Moody's Investors Service, *Rating Methodology; Regulated Gas and Electric Utilities*, June 23, 2017, at 4.

1 2 and has a significant bearing on a utility's financial performance.<sup>11</sup>

The regulatory environment, is thus, one of the most important factors considered by both debt and equity investors in assessing the risks and prospects of utility companies. From the perspective of debt investors, the authorized return should enable the Company to generate the cash flow necessary to meet its nearterm financial obligations, make the capital investments needed to maintain and expand its system, and maintain sufficient levels of liquidity to fund unexpected events.

Moreover, because fixed income investors have many investment alternatives, even within a given market sector, the Company's financial profile must be adequate, on a relative basis, to ensure its ability to attract capital under a variety of economic and financial market conditions. From the perspective of equity investors, the authorized return must be sufficient to provide a riskcomparable return on the equity portion financing the Company's capital investments.

## Q. Please comment on the constructiveness of Missouri's regulatory environment.

A. The Regulatory Research Associates ("RRA") provides an assessment of the extent to which regulatory jurisdictions are constructive, or not, from the perspective of investors. As RRA explains, less constructive environments are associated with higher levels of risk:

23 RRA maintains three principal rating categories, Above 24 Average, Average, and Below Average, with Above Average

<sup>&</sup>lt;sup>11</sup> Standard & Poor's, RatingsDirect, *Key Credit Factors for the Regulated Utilities Industry*, November 19, 2013, at 6.

indicating a relatively more constructive, lower-risk regulatory 1 2 environment from an investor viewpoint, and Below Average indicating a less constructive, higher-risk regulatory climate. 3 Within the three principal rating categories, the numbers 1, 2, 4 5 and 3 indicate relative position. The designation 1 indicates a stronger (more constructive) rating; 2, a mid range rating; and, 6 7 3, a weaker (less constructive) rating. We endeavor to maintain an approximately equal number of ratings above the 8 average and below the average.<sup>12</sup> 9 The RRA ranks this Commission as Average / 3, the fourth least constructive 10

- 11 ranking<sup>13</sup>. If this Commission authorizes a capital structure in this proceeding that
- is <u>not</u> representative of the Company's operations, a signal would be sent to the
- investment community that Missouri's regulatory risk may be increasing further
- based on the unpredictability and instability of regulatory outcomes. This may lead
- to additional downgrades to the constructiveness of the Commission.

16 Q. How does your proposed ratemaking common equity ratio of 68.56% for

17 Confluence Rivers compare with the common equity ratios maintained by

18 the Utility Proxy Groups?

A. My proposed ratemaking common equity ratio of 68.56% for Confluence Rivers is
 outside of the range of common equity ratios maintained by the Utility Proxy
 Groups. Since Confluence Rivers would be perceived to have less financial risk
 than the Utility Proxy Group, I have made a downward adjustment to Confluence
 Rivers' indicated ROE, as will be discussed below.

<sup>&</sup>lt;sup>12</sup> Source: Regulatory Research Associates.

<sup>&</sup>lt;sup>13</sup> Source: Regulatory Research Associates.

1 **VII.** 

#### COMMON EQUITY COST RATE MODELS

#### 2 Q. Is it important that cost of common equity models be market-based?

A. Yes. A public utility must compete for equity in capital markets along with all other
 companies of comparable risk, which includes non-utilities. The cost of common
 equity is thus determined based on equity market expectations for the returns of
 those comparable risk companies. If individual investors are choosing to invest
 their capital among companies of comparable risk, they will choose a company
 providing a higher return over a company providing a lower return.

#### 9 Q. Are your cost of common equity models market-based models?

Α. Yes. The DCF model is market-based because market prices are used in 10 developing the dividend yield component of the model. The RPM is market-based 11 because the bond ratings and expected bond yields used in the application of the 12 RPM reflect the market's assessment of bond/credit risk. In addition, the use of 13 beta ( $\beta$ ) to determine the equity risk premium reflects the market's assessment of 14 market/systematic risk, since betas are derived from regression analyses of market 15 The Predictive Risk Premium Model ("PRPM") uses monthly market 16 prices. returns in addition to expectations of the risk-free rate. The CAPM is market-based 17 for many of the same reasons that the RPM is market-based (*i.e.*, the use of 18 expected bond yields and beta). Selection of the comparable risk non-price 19 regulated companies is market-based because it is based on statistics which result 20 from regression analyses of market prices and reflect the market's assessment of 21 total risk. 22

1 Q. What analytical approaches did you use to determine the Company's ROE?

A. As discussed earlier, I have relied on the DCF model, the RPM, and the CAPM,
 which I apply to the Utility Proxy Group described above. I also applied these
 same models to a Non-Price Regulated Proxy Group described later in this section.

I rely on these models because reasonable investors use a variety of tools 5 and do not rely exclusively on a single source of information or single model. 6 Moreover, the models on which I rely focus on different aspects of return 7 requirements, and provide different insights to investors' views of risk and return. 8 The DCF model, for example, estimates the investor-required return assuming a 9 constant expected dividend yield and growth rate in perpetuity, while Risk 10 Premium-based methods (i.e., the RPM and CAPM approaches) provide the ability 11 to reflect investors' views of risk, future market returns, and the relationship 12 between interest rates and the Cost of equity. Just as the use of market data for 13 14 the Utility Proxy Group adds the reliability necessary to inform expert judgment in arriving at a recommended common equity cost rate, the use of multiple generally 15 accepted common equity cost rate models also adds reliability and accuracy when 16 arriving at a recommended common equity cost rate. 17

18

#### A. DISCOUNTED CASH FLOW MODEL

#### 19 Q. What is the theoretical basis of the DCF model?

A. The DCF model is based on the theory that the present value of an expected future stream of net cash flows during the investment holding period can be determined by discounting those cash flows at the cost of capital, or the investors' capitalization rate. Mathematically this is shown as:

1		$P_0 = \frac{D_1}{(1+ke)} + \frac{D_2}{(1+ke)^2} + \dots + \frac{D_t}{(1+ke)^t}$
2		where:
3		k = the required Return on Common Equity;
4		$D_{1}D_t$ = the future expected dividends; and
5		$P_0$ = the current stock price.
6		The above equation can be rearranged to form the single-stage constant
7		growth DCF model as such:
8		$\mathcal{K}_e = (D_0 \ (1+g))/P + g$
9		where:
10		$K_e$ = the required Return on Common Equity;
11		$D_0$ = the annualized Dividend Per Share;
12		P = the current stock price; and
13		g = the growth rate.
14		In this form, the required ROE is equal to the expected dividend yield plus
15		an expected long-term growth rate. The constant growth DCF formula is derived
16		from the present value DCF formula.
17		Under the model's strict assumptions, the growth rate equals the rate of
18		capital appreciation (that is, the growth in the stock price). Given that assumption,
19		it does not matter whether the investor holds the stock in perpetuity, or whether
20		they hold the stock for some period of time, collect the dividends, then sell at the
21		prevailing market price.
22	Q.	Which version of the DCF model did you use?
23	Α.	I used the single-stage constant growth DCF model.

# Q. Please describe the dividend yield you used in your application of the DCF model.

A. The unadjusted dividend yields are based on the proxy companies' dividends as
 of October 31, 2022, divided by the average of closing market prices for the 60
 trading days ending October 31, 2022.<sup>14</sup>

6

#### Q. Please explain your adjustment to the dividend yield.

- A. Because dividends are paid periodically (quarterly), as opposed to continuously
  (daily), an adjustment must be made to the dividend yield. This is often referred
  to as the discrete, or the Gordon Periodic, version of the DCF model.
- DCF theory calls for the use of the full growth rate, or  $D_1$ , in calculating the 10 dividend yield component of the model. Since the various companies in the Utility 11 Proxy Group increase their quarterly dividend at various times during the year, a 12 reasonable assumption is to reflect one-half the annual dividend growth rate in the 13 14 dividend vield component, or  $D_{1/2}$ . Because the dividend should be representative of the next 12-month period, my adjustment is a conservative approach that does 15 not overstate the dividend yield. Therefore, the actual average dividend yields in 16 Column 1 on page 1 of Schedule DWD-3 have been adjusted upward to reflect 17 one-half the average projected growth rate shown in Column 5. 18

# Q. Please explain the basis of the growth rates you applied to the Utility Proxy Group in your DCF model.

A. Investors with more limited resources than institutional investors are likely to rely
 on widely available financial information services, such as *Value Line*, Zacks, and
 Yahoo! Finance. Investors realize that analysts have significant insight into the

See, Schedule DWD-3, page 1, Column 1.

dynamics of the industries and individual companies they analyze, as well as companies' abilities to effectively manage the effects of changing laws and regulations, and ever-changing economic and market conditions. For these reasons, I used analysts' five-year forecasts of EPS growth in my DCF analysis.

5 Over the long run, there can be no growth in DPS without growth in EPS. 6 Security analysts' earnings expectations have a more significant influence on 7 market prices than dividend expectations. Thus, the use of earnings growth rates 8 in a DCF analysis provides a better match between investors' market price 9 appreciation expectations and the growth rate component of the DCF.

10

#### Q. Please summarize the DCF model results.

A. As shown on page 1 of Schedule DWD-3, the application of the constant growth DCF model to the Utility Proxy Group results in a wide range of indicated ROEs from 5.08% to 14.28%. The mean result, the median result, and the average of the mean and median results is 9.28% for the Utility Proxy Group.

#### 15 Q. Do you have any comments regarding your DCF model results?

Because Middlesex Water Company's ("MSEX") indicated DCF result of 5.08% is Α. 16 below that of the marginal yield on A-rated utility debt (5.88%),<sup>15</sup> it violates the 17 basic financial principle of risk and return, namely that investors require greater 18 returns for bearing greater risk. It is generally accepted that common equity capital 19 has greater investment risk than debt capital, as common equity shareholders are 20 behind debt holders in any claim on a company's assets and earnings. Because 21 of this, any investor required return on equity below the marginal yield on long-22 term debt related to that particular stock is non-sensical and should not be 23

Average A-rated utility bond yield for October 2022 as shown on page 4 of Schedule DWD-4.

considered. Given that MSEX's long-term credit rating from S&P is A, and the
 current (i.e., marginal) yield on A-rated utility bonds of 5.88%,<sup>16</sup> MSEX's indicated
 DCF of 5.08% result violates the principle of risk and return stated above and
 should be eliminated.

Q. Considering the above, what is your recommended indicated ROE applicable
 to the DCF model?

Α. Eliminating MSEX's indicated DCF cost rate of 5.08% results in mean, median, 7 and average of mean and median ROEs of 10.12%, 10.21%, and 10.17%, 8 respectively. In arriving at a conclusion for the DCF-indicated common equity cost 9 rate for the Utility Proxy Group of 9.73%, I have relied on an average of the mean 10 and the median results of the DCF both including and excluding MSEX's DCF 11 result, which takes into consideration all the proxy companies' results, while 12 mitigating the theoretically inconsistent nature of MSEX's DCF results. Because 13 14 my recommended DCF cost rate considers MSEX's illogical DCF result, the 9.73% DCF-indicated common equity cost rate should be viewed as extremely 15 conservative. 16

17

#### B. <u>THE RISK PREMIUM MODEL</u>

#### 18 Q. Please describe the theoretical basis of the RPM.

A. The RPM is based on the fundamental financial principle of risk and return, namely,
 that investors require greater returns for bearing greater risk. The RPM recognizes
 that common equity capital has greater investment risk than debt capital, as
 common equity shareholders are behind debt holders in any claim on a company's

Average A-rated utility bond yield for October 2022 as shown on page 4 of Schedule DWD-4.

assets and earnings. As a result, investors require higher returns from common
 stocks than from investment in bonds, to compensate them for bearing the
 additional risk.

While it is possible to directly observe bond returns and yields, investors' 4 required common equity return cannot be directly determined or observed. 5 According to RPM theory, one can estimate a common equity risk premium over 6 bonds (either historically or prospectively) and use that premium to derive a cost 7 rate of common equity. The cost of common equity equals the expected cost rate 8 for long-term debt capital, plus a risk premium over that cost rate, to compensate 9 common shareholders for the added risk of being unsecured and last-in-line for 10 11 any claim on the corporation's assets and earnings in the event of a liquidation.

## Q. Please explain how you derived your indicated cost of common equity based on the RPM.

A. I relied on the results of the application of two risk premium methods. The first
 method is the PRPM, while the second method is a risk premium model using a
 total market approach.

- 17 1. <u>The Predictive Risk Premium Model</u>
- 18 Q. Please explain the PRPM.

19 A. The PRPM, published in the Journal of Regulatory Economics and The Electricity

- 20 <u>Journal</u><sup>17</sup>, was developed from the work of Robert F. Engle, who shared the Nobel
- 21 Prize in Economics in 2003 "for methods of analyzing economic time series with

<sup>&</sup>lt;sup>17</sup> Autoregressive conditional heteroscedasticity. See "A New Approach for Estimating the Equity Risk Premium for Public Utilities", Pauline M. Ahern, Frank J. Hanley and Richard A. Michelfelder, *The Journal of Regulatory Economics* (December 2011), 40:261-278 and "Comparative Evaluation of the Predictive Risk Premium Model, the Discounted Cash Flow Model and the Capital Asset Pricing Model for Estimating the Cost of Common Equity", Richard A. Michelfelder, Pauline M. Ahern, Dylan W. D'Ascendis, and Frank J. Hanley, *The Electricity Journal* (May 2013), 84-89.

time-varying volatility ("ARCH")".<sup>18</sup> Engle found that volatility changes over time
 and is related from one period to the next, especially in financial markets. Engle
 discovered that the volatility in prices and returns clusters over time and is
 therefore highly predictable and can be used to predict future levels of risk and risk
 premiums.

6 The PRPM estimates the risk / return relationship directly, as the predicted 7 equity risk premium is generated by the prediction of volatility or risk. The PRPM 8 is not based on an <u>estimate</u> of investor behavior, but rather on the evaluation of 9 the results of that behavior (*i.e.*, the variance of historical equity risk premiums).

The inputs to the model are the historical returns on the common shares of 10 each company in the Utility Proxy Group minus the historical monthly yield on long-11 term U.S. Treasury securities through October 2022. Using a generalized form of 12 ARCH, known as GARCH, I calculated each Utility Proxy Group company's 13 projected equity risk premium using Eviews<sup>©</sup> statistical software. When the 14 GARCH Model is applied to the historical return data, it produces a predicted 15 GARCH variance series<sup>19</sup> and a GARCH coefficient<sup>20</sup>. Multiplying the predicted 16 monthly variance by the GARCH coefficient, then annualizing it<sup>21</sup>, produces the 17 predicted annual equity risk premium. I then added the forecasted 30-year U.S. 18 Treasury Bond yield, 3.96%<sup>22</sup>, to each company's PRPM-derived equity risk 19 premium to arrive at an indicated cost of common equity. The 30-year Treasury 20

<sup>&</sup>lt;sup>18</sup> www.nobelprize.org.

<sup>&</sup>lt;sup>19</sup> Illustrated on Columns 1 and 2 of page 2 of Schedule DWD-4.

<sup>&</sup>lt;sup>20</sup> Illustrated on Column 4 of page 2 of Schedule DWD-4.

Annualized Return =  $(1+Monthly Return)^{12} - 1$ .

<sup>&</sup>lt;sup>22</sup> See, Column 6 of page 2 of Schedule DWD-4.

1 yield is a consensus forecast derived from the *Blue Chip Financial Forecasts ("Blue* 

2 <u>Chip")</u><sup>23</sup>.

#### 3 Q. Please describe your selection of a risk-free rate of return.

A. As shown in Schedules DWD-4 and DWD-5, the risk-free rate adopted for
applications of the RPM and CAPM is 3.96%. This risk-free rate of 3.96% is based
on the average of the *Blue Chip* consensus forecast of the expected yields on 30year U.S. Treasury bonds for the six quarters ending with the first calendar quarter
of 2024, and long-term projections for the years 2024 to 2028 and 2029 to 2033.

#### 9 Q. Why do you use the 30-year Treasury yield in your analyses?

A. The yield on long-term U.S. Treasury Bonds is almost risk-free, and its term is consistent with the long-term cost of capital to public utilities measured by the yields on A2 rated public utility bonds, the long-term investment horizon inherent in utilities' common stocks, and the long-term life of the jurisdictional rate base to which the allowed fair rate of return (*i.e.*, cost of capital) will be applied. In contrast, short-term U.S. Treasury yields are more volatile and largely a function of Federal Reserve monetary policy.

17 Q. What

#### What are the results of the PRPM?

A. As shown on page 2 of Schedule DWD-4, the mean PRPM indicated common equity cost rate for the Utility Proxy Group is 12.28%, the median is 12.12%, and the average of the two is 12.20%. Consistent with my reliance on the average of the median and mean results of the DCF, I relied on the average of the mean and median results of the Utility Proxy Group PRPM to calculate a cost of common equity rate of 12.20%.

<sup>23</sup> 

Blue Chip Financial Forecasts, June 1, 2022, at p. 14 and November 1, 2022, at p. 2.

1

#### 2. <u>The Total Market Approach Risk Premium Model</u>

2 Q. Please explain the total market approach RPM.

A. The total market approach RPM adds a prospective public utility bond yield to an
 average of: 1) an equity risk premium that is derived from a beta-adjusted total
 market equity risk premium; and 2) an equity risk premium based on the S&P
 Utilities Index.

# Q. Please explain the basis of the expected bond yield of 5.74% applicable to the Utility Proxy Group.

Α. The first step in the total market approach RPM analysis is to determine the 9 expected bond yield. Because both ratemaking and the cost of capital, including 10 common equity cost rate, are prospective in nature, a prospective yield on 11 similarly-rated long-term debt is essential. I rely on a consensus forecast of about 12 50 economists of the expected yield on Aaa rated corporate bonds for the six 13 calendar guarters ending with the first calendar guarter of 2024, and the long-term 14 15 projections for 2024 to 2028, and 2029 to 2033 from *Blue Chip*. As shown on line 1 of page 3 of Schedule DWD-4, the average expected yield on Moody's Aaa rated 16 corporate bonds is 5.24%. In order to derive an expected yield on A2 rated public 17 18 utility bonds, I make an upward adjustment of 0.39%, which represents a recent spread between Aaa rated corporate bonds and A2 rated public utility bonds, in 19 order to adjust the expected Aaa rated corporate bond yield to an equivalent 20 Moody's A2 rated public utility bond.<sup>24</sup> Adding that recent 0.39% spread to the 21 22 expected Aaa rated corporate bond yield of 5.24% results in an expected A2 rated public utility bond of 5.63%. 23

As shown on line 2 and explained in note 2 of page 3 of Schedule DWD-4.

1	Since the Utility Proxy Group's average Moody's long-term issuer rating is
2	A3, another adjustment to the expected A2 rated public utility bond yield is needed
3	to reflect the difference in bond ratings. An upward adjustment of 0.11%, which
4	represents one-third of a recent spread between A2 and Baa2 rated public utility
5	bond yields, is necessary to make the A2 rated prospective bond yield applicable
6	to an A3 rated public utility bond. <sup>25</sup> Adding the 0.11% to the 5.63% prospective A2
7	rated public utility bond yield results in a 5.74% expected bond yield for the Utility
8	Proxy Group.

### 9

10

### Table 3: Summary of the Calculation of the Utility Proxy Group Projected Bond Yield<sup>26</sup>

Prospective Yield on Moody's Aaa Rated Corporate Bonds ( <i>Blue Chip</i> )	5.24%
Adjustment to Reflect Yield Spread Between Moody's Aaa Rated Corporate Bonds and Moody's A2 Rated Utility Bonds	0.39%
Adjustment to Reflect the Utility Proxy Group's Average Moody's Bond Rating of A3	<u>0.11%</u>
Prospective Bond Yield Applicable to the Utility Proxy Group	<u>5.74%</u>

To develop the indicated ROE using the total market approach RPM, this 11

prospective bond yield is then added to the average of the three different equity 12

risk premiums described below. 13

#### Q. Please explain how the beta-derived equity risk premium is determined. 14

- Α. The components of the beta-derived risk premium model are: 1) an expected 15
- 16 market equity risk premium over corporate bonds, and 2) beta. The derivation of

<sup>25</sup> As shown on line 4 and explained in note 3, page 3 of Schedule DWD-4. Moody's does not provide public utility bond yields for A3 rated bonds. As such, it was necessary to estimate the difference between A2 rated and A3 rated public utility bonds. Because there are three steps between Baa2 and A2 (Baa2 to Baa1, Baa1 to A3, and A3 to A2) I assumed an adjustment of one-third of the difference between the A2 rated and Baa2 rated public utility bond yield was appropriate. 26

As shown on page 3 of Schedule DWD-4.

the beta-derived equity risk premium that I applied to the Utility Proxy Group is
shown on lines 1 through 9 of page 8 of Schedule DWD-4. The total beta-derived
equity risk premium I applied was based on an average of: 1) Ibbotson-based
equity risk premiums; 2) *Value Line*-based equity risk premiums; and 3)
Bloomberg-based equity risk premium. Each of these is described in turn.

Q. How did you derive a market equity risk premium based on long-term
 historical data?

Α. To derive a historical market equity risk premium, I used the most recent holding 8 period returns for the large company common stocks from the Kroll Stocks, Bonds, 9 Bills, and Inflation ("SBBI") 2022 Yearbook ("SBBI – 2022")<sup>27</sup> less the average 10 historical yield on Moody's Aaa/Aa rated corporate bonds for the period 1928 to 11 2021. The use of holding period returns over a very long period of time is 12 appropriate because it is consistent with the long-term investment horizon 13 14 presumed by investing in a going concern, *i.e.*, a company expected to operate in perpetuity. 15

16 SBBI's long-term arithmetic mean monthly total return rate on large 17 company common stocks was 12.11% and the long-term arithmetic mean monthly 18 yield on Moody's Aaa/Aa rated corporate bonds was 5.98% from 1928 to 2021.<sup>28</sup> 19 As shown on line 1 of page 8 of Schedule DWD-4, subtracting the mean monthly 20 bond yield from the total return on large company stocks results in a long-term 21 historical equity risk premium of 6.13%.

<sup>&</sup>lt;sup>27</sup> <u>SBBI-2022</u> Appendix A Tables: Morningstar Stocks, Bonds, Bills, & Inflation 1926-2021.

As explained in note 1 on page 8 of Schedule DWD-4.

I used the arithmetic mean monthly total return rates for the large company 1 stocks and yields (income returns) for the Moody's Aaa/Aa rated corporate bonds, 2 3 because they are appropriate for the purpose of estimating the cost of capital as noted in SBBI – 2022.<sup>29</sup> The use of the arithmetic mean return rates and yields is 4 appropriate because historical total returns and equity risk premiums provide 5 insight into the variance and standard deviation of returns needed by investors in 6 7 estimating future risk when making a current investment. If investors relied on the geometric mean of historical equity risk premiums, they would have no insight into 8 the potential variance of future returns because the geometric mean relates to the 9 change over many periods to a constant rate of change, thereby obviating the year-10 to-year fluctuations, or variance, which is critical to risk analysis. 11

# Q. Please explain the derivation of the regression-based market equity risk premium.

14 Α. To derive the regression analysis-derived market equity risk premium of 7.02%, shown on line 2 of page 8 of Schedule DWD-4. I used the same monthly 15 annualized total returns on large company common stocks relative to the monthly 16 annualized yields on Moody's Aaa/Aa rated corporate bonds as mentioned above. 17 The relationship between interest rates and the market equity risk premium was 18 modeled using the observed monthly market equity risk premium as the dependent 19 variable, and the monthly yield on Moody's Aaa/Aa rated corporate bonds as the 20 independent variable. I used a linear Ordinary Least Squares ("OLS") regression, 21 in which the market equity risk premium is expressed as a function of the Moody's 22 Aaa/Aa rated corporate bond yield: 23

<sup>&</sup>lt;sup>29</sup> <u>SBBI – 2022</u>, at 200-201.

1		$RP = \alpha + \beta \; (R_{Aaa/Aa})$
2		where:
3		RP = the market equity risk premium;
4		$\alpha$ = the regression intercept coefficient;
5		$\beta$ = the regression slope coefficient; and
6		R <sub>Aaa/Aa</sub> = the Moody's Aaa/Aa rated corporate bond yield.
7		Using the equation generated by the regression, an expected equity risk
8		premium of 7.02% is calculated using the average forecast of Aaa corporate bond
9		yield of 5.24%, as discussed above.
10	Q.	Please explain the derivation of a PRPM equity risk premium.
11	A.	I used the same PRPM approach described previously to develop another equity
12		risk premium estimate. The inputs to the model are the historical monthly returns
13		on large company common stocks minus the monthly yields on Aaa/Aa rated
14		corporate bonds during the period from January 1928 through October 2022.30
15		Using the previously discussed generalized form of ARCH, known as GARCH, the
16		projected equity risk premium is determined using $Eviews^{\mathbb{S}}$ statistical software.
17		The resulting PRPM predicted market equity risk premium is 9.79%. <sup>31</sup>
18	Q.	Please explain the derivation of a projected equity risk premium based on
19		Value Line Summary and Index data for your RPM analysis.
20	A.	As noted previously, because both ratemaking and the cost of capital are
21		prospective, a prospective market equity risk premium is needed. The derivation
22		of the forecasted or prospective market equity risk premium can be found in note

Data from January 1928-December 2021 is from <u>SBBI – 2022</u>. Data from January 2022 – October 2022 is from Bloomberg Professional Services. Shown on line 3 on page 8 of Schedule DWD-4. 

4 on page 8 of Schedule DWD-4. Consistent with the premise that total returns
 are the sum of capital appreciation and income returns, this prospective market
 return is derived from an average of the three to five-year median market price
 appreciation potential by *Value Line* Summary and Index for the 13 weeks ending
 November 4, 2022, plus an average of the median estimated dividend yield for the
 common stocks of the 1,700 firms covered in *Value Line*'s Standard Edition.<sup>32</sup>

The average median expected price appreciation is 70.00%, which translates to a 14.19% annual appreciation, and when added to the average of *Value Line's* median expected dividend yields of 2.21%, equates to a forecasted annual total return rate on the market of 16.40%. The forecasted Aaa rated bond yield of 5.24% is deducted from the total market return of 16.40%, resulting in an equity risk premium of 11.16%, shown on page 8, line 4 of Schedule DWD-4.

# Q. Please explain the derivation of an equity risk premium based on *Value Line* data for the S&P 500 companies.

A. Using data from *Value Line*, I calculated an expected total return on the S&P 500
 using expected dividend yields as a proxy for income return and long-term growth
 estimates as a proxy for capital appreciation. The expected total return for the
 S&P 500 is 16.41%. Subtracting the prospective yield on Aaa rated corporate
 bonds of 5.24% results in a 11.17% projected equity risk premium.

# Q. Please explain the derivation of an equity risk premium based on Bloomberg data.

A. Using data from Bloomberg, I calculated an expected total return on the S&P 500
 using expected dividend yields as a proxy for income return and long-term growth

As explained in detail in page 2, note 1 of Schedule DWD-5.

- estimates as a proxy for capital appreciation, identical to the method described
   above. The expected total return for the S&P 500 is 12.05%. Subtracting the
   prospective yield on Aaa rated corporate bonds of 5.24% resulted in a 6.81%
   projected equity risk premium.
   What is your conclusion of a beta-derived equity risk premium for use in your
   RPM analysis?
- 7 A. I gave equal weight to the six equity risk premiums in arriving at my conclusion of
- 8 8.68%.<sup>33</sup>

#### 9

10

### Table 4: Summary of the Calculation of the Equity Risk Premium Using Total Market Returns<sup>34</sup>

Historical Spread Between Total Returns of Large Stocks and Aaa and Aa2 Rated Corporate Bond Yields (1928 – 2021)	6.13%
Regression Analysis on Historical Data	7.02%
PRPM Analysis on Historical Data	9.79%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected Aaa Corporate Bond Yields	11.16%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P 500 less Projected Aaa Corporate Bond Yields	11.17%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected Aaa Corporate Bond Yields	<u>6.81%</u>
Average	<u>8.68%</u>

11	After calculating the average market equity risk premium of 8.68%, I
12	adjusted it by beta to account for the risk of the Utility Proxy Group. As discussed
13	below, the beta is a meaningful measure of prospective relative risk to the market
14	as a whole and is a logical means by which to allocate a company's, or proxy
15	group's, share of the market's total equity risk premium relative to corporate bond

<sup>&</sup>lt;sup>33</sup> See, line 7 on page 8 of Schedule DWD-4.

As shown on page 8 of Schedule DWD-4.

yields. As shown on page 1 of Schedule DWD-5, the average of the mean and
 median beta for the Utility Proxy Group is 0.78. Multiplying the beta of the Utility
 Proxy Group of 0.78 by the market equity risk premium of 8.68% resulted in a beta adjusted equity risk premium of 6.77% for the Utility Proxy Group.

Q. How did you derive the equity risk premium based on the S&P Utility Index
 and Moody's A rated public utility bonds?

Α. 7 I estimated three equity risk premiums based on S&P Utility Index holding returns, and two equity risk premiums based on the expected returns of the S&P Utilities 8 Index, using Value Line and Bloomberg data, respectively. Turning first to the S&P 9 Utility Index holding period returns, I derived a long-term monthly arithmetic mean 10 equity risk premium between the S&P Utility Index total returns of 10.74% and 11 monthly A rated public utility bond yields of 6.46% from 1928 to 2021, to arrive at 12 an equity risk premium of 4.28%.<sup>35</sup> I then used the same historical data to derive 13 14 an equity risk premium of 5.01% based on a regression of the monthly equity risk premiums. The final S&P Utility Index holding period equity risk premium involved 15 applying the PRPM using the historical monthly equity risk premiums from January 16 1928 to October 2022 to arrive at a PRPM-derived equity risk premium of 5.51% 17 for the S&P Utility Index. 18

I then derived expected total returns on the S&P Utilities Index of 9.60%
 and 10.38% using data from *Value Line* and Bloomberg, respectively, and
 subtracted the prospective A2 rated public utility bond yield (5.63%)<sup>36</sup>, which
 results in risk premiums of 3.97% and 4.75%, respectively. As with the market

<sup>&</sup>lt;sup>35</sup> As shown on line 1 on page 11 of Schedule DWD-4.

<sup>&</sup>lt;sup>36</sup> Derived on line 3 of page 3 of Schedule DWD-4.

- 1 equity risk premiums, I averaged each risk premium to arrive at my utility-specific
- 2 equity risk premium of 4.70%.

3 4

### Table 5: Summary of the Calculation of the Equity Risk Premium Using S&P Utility Index Holding Returns<sup>37</sup>

Historical Spread Between Total Returns of the S&P Utilities Index and A2 Rated Utility Bond Yields (1928 – 2021)	4.28%
Regression Analysis on Historical Data	5.01%
PRPM Analysis on Historical Data	5.51%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P Utilities Index less Projected A2 Utility Bond Yields	3.97%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P Utilities Index less Projected A2 Utility Bond Yields	<u>4.75%</u>
Average	<u>4.70%</u>

5

# Q. What is your conclusion of an equity risk premium for use in your total market approach RPM analysis?

- 8 A. The equity risk premium I applied to the Utility Proxy Group is 5.74%, which is the
- 9 average of the beta-derived and the S&P utility equity risk premiums of 6.77% and
- 10 4.70%, respectively.<sup>38</sup>

#### 11 Q. What is the indicated RPM common equity cost rate based on the total

- 12 market approach?
- A. As shown on line 7 of Schedule DWD-4, page 3, I calculated a common equity
- cost rate of 11.48% for the Utility Proxy Group based on the total market approach

15 of the RPM.

As shown on page 11 of Schedule DWD-4.

<sup>&</sup>lt;sup>38</sup> As shown on page 7 of Schedule DWD-4.

#### Table 6: Summary of the Total Market Return Risk Premium Model<sup>39</sup>

Prospective Moody's A3 Rated Utility Bond Applicable to the Utility Proxy Group	5.74%
Prospective Equity Risk Premium	<u>5.74%</u>
Indicated Cost of Common Equity	<u>11.48%</u>

#### 2 Q. What are the results of your application of the PRPM and the total market

#### 3 approach RPM?

- A. As shown on page 1 of Schedule DWD-4, the indicated RPM-derived common
  equity cost rate is 11.84%, which gives equal weight to the PRPM (12.20%) and
  the adjusted market approach results (11.48%).
- 7

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#### C. THE CAPITAL ASSET PRICING MODEL

#### 8 Q. Please explain the theoretical basis of the CAPM.

- 9 A. CAPM theory defines risk as the co-variability of a security's returns with the
  10 market's returns as measured by beta (β). A beta of less than 1.0 indicates lower
  11 variability than the market as a whole, while a beta greater than 1.0 indicates
  12 greater variability than the market.
- The CAPM assumes that all other risk (*i.e.*, all non-market or unsystematic risk) can be eliminated through diversification. The risk that cannot be eliminated through diversification is called market, or systematic, risk. In addition, the CAPM presumes that investors require compensation only for systematic risk, which is the result of macroeconomic and other events that affect the returns on all assets. The model is applied by adding a risk-free rate of return to a market risk premium, which is adjusted proportionately to reflect the systematic risk of the individual

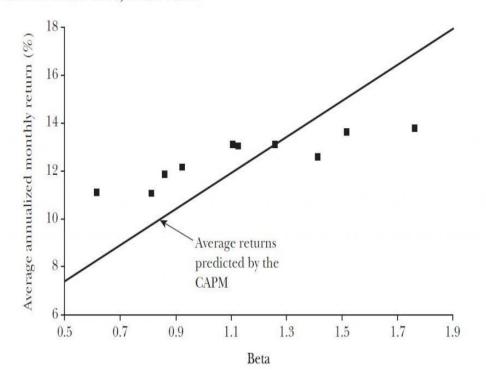
As shown on page 3 of Schedule DWD-4.

1	security relative to the total market, as measured by beta. The traditional CAPM			
2	model is expressed as:			
3		Rs	=	$R_f + \beta(R_m - R_f)$
4	Where:	R₅	=	Return rate on the common stock;
5		R <sub>f</sub>	=	Risk-free rate of return;
6		Rm	=	Return rate on the market as a whole; and
7 8		β	=	Adjusted beta (volatility of the security relative to the market as a whole).
9	Nume	erous te	ests of	the CAPM have measured the extent to which security
10	returns and beta are related as predicted by the CAPM, confirming its validity. The			
11	empirical CA	NPM ("E	ECAPM	") reflects the reality that while the results of these tests
12	support the notion that beta is related to security returns, the empirical Security			
13	Market Line	("SML	") desc	ribed by the CAPM formula is not as steeply sloped as
14	the predicted	d SML.	40 The	ECAPM reflects this empirical reality. Fama and French
15	clearly state	regard	ing Fig	ure 2, below, that "[t]he returns on the low beta portfolios
16	are too high,	, and th	ne retur	ns on the high beta portfolios are too low." <sup>41</sup>

Roger A. Morin, <u>Modern Regulatory Finance</u>, (PUR Books, 2021) at 221. ("Morin") Eugene F. Fama and Kenneth R. French, "The Capital Asset Pricing Model: Theory and Evidence", *Journal of Economic Perspectives*, Vol. 18, No. 3, Summer 2004 at 33 ("Fama & French"). http://pubs.aeaweb.org/doi/pdfplus/10.1257/0895330042162430. 

#### Figure 2 http://pubs.aeaweb.org/doi/pdfplus/10.1257/0895330042162430

Average Annualized Monthly Return versus Beta for Value Weight Portfolios Formed on Prior Beta, 1928–2003



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In addition, Morin observes that while the results of these tests support the

#### 3 notion that beta is related to security returns, the empirical SML described by the

4 CAPM formula is not as steeply sloped as the predicted SML. Morin states:

With few exceptions, the empirical studies agree that ... low-beta securities earn returns somewhat higher than the CAPM would predict, and high-beta securities earn less than predicted.<sup>42</sup>

9 Therefore, the empirical evidence suggests that the expected return 10 on a security is related to its risk by the following approximation:

$$K = R_F + x \beta(R_M - R_F) + (1-x) \beta(R_M - R_F)$$

where x is a fraction to be determined empirically. The value of x that best explains the observed relationship [is] Return = 0.0829 +

<sup>&</sup>lt;sup>42</sup> Morin, at 207.

1 2		0.0520 $\beta$ is between 0.25 and 0.30. If x = 0.25, the equation becomes:
3		K = R <sub>F</sub> + 0.25(R <sub>M</sub> - R <sub>F</sub> ) + 0.75 β(R <sub>M</sub> - R <sub>F</sub> ) <sup>43</sup>
4		Fama and French provide similar support for the ECAPM when they state:
5 6 7 8 9 10		The early tests firmly reject the Sharpe-Lintner version of the CAPM. There is a positive relation between beta and average return, but it is too 'flat.' The regressions consistently find that the intercept is greater than the average risk-free rate and the coefficient on beta is less than the average excess market return This is true in the early tests as well as in more recent cross-section regressions
11		tests, like Fama and French (1992).44
12		Finally, Fama and French further note:
13 14 15 16 17 18 19 20 21		Confirming earlier evidence, the relation between beta and average return for the ten portfolios is much flatter than the Sharpe-Linter CAPM predicts. The returns on low beta portfolios are too high, and the returns on the high beta portfolios are too low. For example, the predicted return on the portfolio with the lowest beta is 8.3 percent per year; the actual return as 11.1 percent. The predicted return on the portfolio with the highest beta is 16.8 percent per year; the actual is 13.7 percent. <sup>45</sup>
21		Clearly, the justification from Morin, Fama, and French along with their
23		reviews of other academic research on the CAPM, validate the use of the ECAPM.
24		In view of theory and practical research, I have applied both the traditional CAPM
25		and the ECAPM to the companies in the Utility Proxy Group and averaged the
26		results.
27	Q.	What beta did you use in your CAPM analysis?
28	Α.	With respect to beta, I considered two methods of calculation: 1) the average beta
29		of the Utility Proxy Group companies reported by Bloomberg Professional
30		Services; and 2) the average beta of the Utility Proxy Group companies as reported

Morin, at 221. Fama & French, at 32. Fama & French, at 33. 

by Value Line. While both of those services adjust their calculated (or "raw") betas
 to reflect the tendency of beta to regress to the market mean of 1.00, Value Line
 calculates beta over a five-year period, while Bloomberg's calculation is based on
 two years of data.

5 Q. Please describe your selection of a risk-free rate of return.

A. Discussed previously, the risk-free rate adopted for both applications of the CAPM
is 3.96%. This risk-free rate is based on the average of the *Blue Chip* consensus
forecast of the expected yields on 30-year U.S. Treasury bonds for the six quarters
ending with the first calendar quarter of 2024, and long-term projections for the
years 2024 to 2028 and 2029 to 2033.

# Q. Please explain the estimation of the expected risk premium for the market used in your CAPM analyses.

# A. The basis of the market risk premium is explained in detail in note 1 on page 2 of Schedule DWD-5. As discussed previously, the market risk premium is derived from an average of:

- 16 (i) Ibbotson-based market risk premiums;
- 17 (ii) *Value Line* data-based market risk premiums; and
- 18 (iii) Bloomberg data-based market risk premiums.

The long-term income return on U.S. Government Securities of 5.02% was deducted from the <u>SBBI - 2022</u> monthly historical total market return of 12.37%, which results in an historical market equity risk premium of 7.35%.<sup>46</sup> I applied a linear OLS regression to the monthly annualized historical returns on the S&P 500 relative to historical yields on long-term U.S. Government Securities from SBBI -

<sup>&</sup>lt;u>SBBI – 2022</u>, at 256-258, 274-276.

<u>2022</u>. That regression analysis yielded a market equity risk premium of 8.65%.
 The PRPM market equity risk premium is 10.89% and is derived using the PRPM
 relative to the yields on long-term U.S. Treasury securities from January 1926
 through October 2022.

The Value Line Summary and Index-derived forecasted total market equity 5 risk premium is derived by deducting the forecasted risk-free rate of 3.96%, 6 7 discussed above, from the Value Line Summary and Index projected total annual market return of 16.40%, resulting in a forecasted total market equity risk premium 8 of 12.44%. The S&P 500 projected market equity risk premium using Value Line 9 data is derived by subtracting the projected risk-free rate of 3.96% from the 10 projected total return of the S&P 500 of 16.41%. The resulting market equity risk 11 premium is 12.45%. 12

The S&P 500 projected market equity risk premium using Bloomberg data is derived by subtracting the projected risk-free rate of 3.96% from the projected total return of the S&P 500 of 12.05%. The resulting market equity risk premium is 8.09%.

17 These six market risk premiums, when averaged, resulted in an average 18 total market equity risk premium of 9.98%.

### Table 7: Summary of the Calculation of the Market Risk Premiumfor Use in the CAPM47

Historical Spread Between Total Returns of Large Stocks and Long-Term Government Bond Yields (1926 – 2021)	7.35%
Regression Analysis on Historical Data	8.65%
PRPM Analysis on Historical Data	10.89%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected 30-Year Treasury Bond Yields	12.44%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Value Line for the S&P 500 less Projected 30-Year Treasury Bond Yields	12.45%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected 30-Year Treasury Bond Yields	<u>8.09%</u>
Average	<u>9.98%</u>

#### 3 Q. What are the results of your application of the traditional and empirical

#### 4 **CAPM to the Utility Proxy Group?**

5 A. As shown on page 1 of Schedule DWD-5, the mean result of my CAPM/ECAPM

6 analysis is 12.14%, the median is 11.85%, and the average of the two is 12.00%.

- 7 Consistent with my reliance on the average of mean and median DCF results
- 8 discussed above, the indicated common equity cost rate using the CAPM/ECAPM
- 9 is 12.00%.

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As shown on page 2 of Schedule DWD-5.

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#### D. <u>COMMON EQUITY COST RATES FOR A PROXY GROUP OF</u> <u>DOMESTIC, NON-PRICE REGULATED COMPANIES BASED ON THE</u> <u>DCF, RPM, AND CAPM</u>

### Q. Why did you also consider a proxy group of domestic, non-price regulated companies?

6 Α. In the Hope and Bluefield cases, the U.S. Supreme Court did not specify that comparable risk companies had to be utilities. Since the purpose of rate regulation 7 8 is to be a substitute for the competition of the marketplace, non-price regulated firms operating in the competitive marketplace make an excellent proxy if they are 9 comparable in total risk to the Utility Proxy Group being used to estimate the cost 10 of common equity. The selection of such domestic, non-price regulated 11 competitive firms theoretically and empirically results in a proxy group which is 12 comparable in total risk to the Utility Proxy Group. 13

# Q. How did you select non-price regulated companies that are comparable in total risk to the Utility Proxy Group?

Α. 16 In order to select a proxy group of domestic, non-price regulated companies similar in total risk to the Utility Proxy Group, I relied on beta and related statistics derived 17 from Value Line regression analyses of weekly market prices over the most recent 18 19 260 weeks (*i.e.*, five years). Using these selection criteria resulted in a proxy group of 27 domestic, non-price regulated firms comparable in total risk to the Utility 20 21 Proxy Group. Total risk is the sum of non-diversifiable market risk and diversifiable company-specific risks. The following criteria were used in the selection of the 22 domestic, non-price regulated firms: 23

- 24 (i) They must be covered by *Value Line*;
- 25 (ii) They must be domestic, non-price regulated companies, *i.e.*, non-utilities;

- 1 (iii) Their beta must lie within plus or minus two standard deviations of the 2 average unadjusted beta of the Utility Proxy Group; and
- (iv) The residual standard errors of the *Value Line* regressions which gave rise
   to the unadjusted betas must lie within plus or minus two standard
   deviations of the average residual standard error of the Utility Proxy Group.
   Betas are a measure of market or systematic risk, which is not diversifiable.
- The residual standard errors of the regressions were used to measure each firm's
  company-specific, diversifiable risk. Companies that have similar betas <u>and</u> similar
  residual standard errors resulting from the same regression analyses have similar
  total investment risk.
- Q. Have you prepared a schedule which shows the data from which you
   selected the 27 domestic, non-price regulated companies that are
   comparable in total risk to the Utility Proxy Group?
- A. Yes, the basis of my selection, and both proxy groups' regression statistics, are
  shown in Schedule DWD-6.

Q. Did you calculate common equity cost rates using the DCF, RPM, and CAPM
 for the Non-Price Regulated Proxy Group?

- A. Yes. Because the DCF, RPM, and CAPM have been applied in an identical
   manner as described above, I will not repeat the details of the rationale and
   application of each model. One exception is in the application of the RPM, where
   I did not use public utility-specific equity risk premiums, nor did I apply the PRPM
   to the individual companies.
- Page 2 of Schedule DWD-7 contains the derivation of the DCF cost rates.
   As shown, the indicated common equity cost rate using the DCF for the Non-Price

Regulated Proxy Group comparable in total risk to the Utility Proxy Group, is
 11.29%.

3 Pages 3 through 5 of DWD-7 contain the data and calculations that support the 12.76% RPM cost rate. As shown on line 1 of page 3 of Schedule DWD-7, the 4 consensus prospective yield on Moody's Baa rated corporate bonds for the six 5 quarters ending in the first quarter of 2024, and for the years 2024 to 2028 and 6 2029 to 2033, is 6.25%.<sup>48</sup> Since the Non-Price Regulated Proxy Group has an 7 average Moody's long-term issuer rating of Baa1, a 0.17% downward adjustment 8 of the prospective Baa2 rated corporate bond yield is necessary to reflect a 9 difference in ratings.49 10

When the beta-adjusted risk premium of 6.68%<sup>50</sup> relative to the Non-Price Regulated Proxy Group is added to the adjusted prospective Baa1 rated corporate bond yield of 6.08%, the indicated RPM cost rate is 12.76%.

Page 6 contains the inputs and calculations that support my indicated
 CAPM/ECAPM cost rate of 11.94%.

16 Q. What is the cost rate of common equity based on the Non-Price Regulated

#### 17 **Proxy Group comparable in total risk to the Utility Proxy Group?**

- A. As shown on page 1 of Schedule DWD-7, the results of the DCF, RPM, and CAPM
- applied to the Non-Price Regulated Proxy Group comparable in total risk to the
- 20 Utility Proxy Group are 11.29%, 12.76%, and 11.94%, respectively. The average

<sup>&</sup>lt;sup>48</sup> Blue Chip Financial Forecasts, June 1, 2022, at p. 14 and November 1, 2022, at p. 2.

<sup>&</sup>lt;sup>49</sup> The 0.17% downward adjustment is equal to one-third of the spread between A2 and Baa2 corporate bond yields, as illustrated in note 2 on page 3 of Schedule DWD-7.

<sup>&</sup>lt;sup>50</sup> Derived on page 5 of Schedule DWD-7.

of the mean and median of these models is 11.97%, which I used as the indicated

2 common equity cost rate for the Non-Price Regulated Proxy Group.

#### 3 VIII. CONCLUSION OF COMMON EQUITY COST RATE BEFORE ADJUSTMENT

### 4 Q. What is the indicated range of common equity cost rates before 5 adjustments?

A. Based on the results of the application of multiple cost of common equity models
to the Utility Proxy Group, my recommended range of ROEs attributable to the
Utility Proxy Group is between 10.36% and 11.36%. The indicated range is equal
to 50 basis points above and below the midpoint of my results.

I used multiple cost of common equity models as primary tools in arriving at my recommended common equity cost rate, because no single model is so inherently precise that it can be relied on solely to the exclusion of other theoretically sound models. The use of multiple models adds reliability to the estimation of the common equity cost rate, and the prudence of using multiple cost of common equity models is supported in both the financial literature and regulatory precedent.

As discussed previously, after determining the indicated range of ROE attributable to a comparable group, there must be an evaluation of relative risk between that group and the target company to determine whether it is appropriate to apply adjustments to the comparable group's indicated ROE to better reflect the target company's specific risks.

#### 1 IX. ADJUSTMENTS TO THE COMMON EQUITY COST RATE

2

#### A. BUSINESS RISK ADJUSTMENT

### Q. Does Confluence Rivers' smaller size compared with the Utility Proxy Group increase its business risk?

A. Yes. Confluence Rivers' smaller size relative to the Utility Proxy Group companies
 indicates greater relative business risk for the Company because, all else being
 equal, size has a material bearing on risk.

8 Size affects business risk because smaller companies generally are less 9 able to cope with significant events that affect sales, revenues, and earnings. For 10 example, smaller companies face more risk exposure to business cycles and 11 economic conditions, both nationally and locally. Additionally, the loss of revenues 12 from a few larger customers would have a greater effect on a small company than 13 on a bigger company with a larger, more diverse, customer base.

As further evidence illustrates that smaller firms are riskier, investors generally demand greater returns from smaller firms to compensate for less marketability and liquidity of their securities. Duff & Phelps' (now Kroll) discusses the nature of the small-size phenomenon, providing an indication of the magnitude of the size premium based on several measures of size. In discussing "Size as a Predictor of Equity Premiums," Kroll states:

The size effect is based on the empirical observation that companies of smaller size are associated with greater risk and, therefore, have greater cost of capital [sic]. The "size" of a company is one of the most important risk elements to consider when developing cost of equity capital estimates for use in valuing a business simply because size has been shown to be a *predictor* of equity returns. In other words, there is a significant (negative) relationship between size and

historical equity returns - as size decreases, returns tend to increase, 1 2 and vice versa. (footnote omitted) (emphasis in original)<sup>51</sup> 3 Furthermore, in "The Capital Asset Pricing Model: Theory and Evidence," Fama and French note size is indeed a risk factor which must be reflected when 4 estimating the cost of common equity. On page 38, they note: 5 . . . the higher average returns on small stocks and high book-to-6 market stocks reflect unidentified state variables that produce 7 undiversifiable risks (covariances) in returns not captured in the 8 9 market return and are priced separately from market betas.<sup>52</sup> Based on this evidence, Fama and French proposed their three-factor 10 model which includes a size variable in recognition of the effect size has on the 11 cost of common equity. 12 Also, it is a basic financial principle that the use of funds invested, and not 13 the source of funds, is what gives rise to the risk of any investment.<sup>53</sup> Eugene 14 Brigham, a well-known authority, states: 15 A number of researchers have observed that portfolios of small-firms 16 (sic) have earned consistently higher average returns than those of 17 large-firm stocks; this is called the "small-firm effect." On the surface, 18 it would seem to be advantageous to the small firms to provide 19 average returns in a stock market that are higher than those of larger 20 firms. In reality, it is bad news for the small firm; what the small-21 firm effect means is that the capital market demands higher 22 returns on stocks of small firms than on otherwise similar 23 stocks of the large firms. (emphasis added)<sup>54</sup> 24 Consistent with the financial principle of risk and return discussed above, 25 increased relative risk due to small size must be considered in the allowed rate of 26

<sup>&</sup>lt;sup>51</sup> Kroll: Cost of Capital Navigator: U.S. Cost of Capital Module, "Size as a Predictor of Equity Returns," at 1

<sup>&</sup>lt;sup>52</sup> Fama & French, at 25-43.

<sup>&</sup>lt;sup>53</sup> Richard A. Brealey and Stewart C. Myers, <u>Principles of Corporate Finance</u> (McGraw-Hill Book Company, 1996), at 204-205, 229.

<sup>&</sup>lt;sup>54</sup> Eugene F. Brigham, <u>Fundamentals of Financial Management</u>, Fifth Edition (The Dryden Press, 1989), at 623.

- return on common equity. Therefore, the Commission's authorization of a cost 1
- rate of common equity in this proceeding must appropriately reflect the unique risks 2
- 3 of Confluence Rivers, including its small size, which is justified and supported
- above by evidence in the financial literature. 4

Is there a way to quantify a relative risk adjustment due to Confluence Rivers' Q. 5

6

- greater business risk relative to the Utility Proxy Group?
- Α. Yes. In the absence of other empirical methods. I compared Confluence Rivers' 7

and the Utility Proxy Group's relative size, as measured by an estimated market 8

capitalization of common equity for Confluence Rivers. 9

10 11

12

#### Table 8: Size as Measured by Market Capitalization for the Company and the Utility Proxy Group

	Market Capitalization* (\$ Millions)	Times Greater Than the Company
Confluence Rivers	\$38.085	
Utility Proxy Group Median	\$3,337.436	87.6x
*From page 1 of Schedule DWD-8.		

The Company's estimated market capitalization was at \$38.085 million as 13 of October 31, 2022, compared with the median market capitalization of the Utility 14 Proxy Group of \$3.34 billion as of October 31, 2022. The Utility Proxy Group's 15 market capitalization is 87.6 times the size of Confluence Rivers' estimated market 16 capitalization. 17

As a result, it is necessary to upwardly adjust the indicated range of 18 common equity cost rates to reflect Confluence Rivers' greater risk due to its 19 smaller relative size. The determination is based on the size premiums for 20 portfolios of New York Stock Exchange, American Stock Exchange, and NASDAQ 21

listed companies ranked by deciles for the 1926 to 2021 period. The average size
premium for the Utility Proxy Group with a market capitalization of \$3.34 billion falls
in the 5<sup>th</sup> decile, while Confluence Rivers' market capitalization of \$38.085 million
places the Company in the 10<sup>th</sup> decile. The size premium spread between the 5<sup>th</sup>
decile and the 10<sup>th</sup> decile is 3.91%. Even though a 3.91% upward size adjustment
is indicated, I applied a size premium of 1.00% to Confluence Rivers' indicated
range of common equity cost rates.

8

#### B. <u>Financial Risk Adjustment</u>

9 Q. You mentioned above that Confluence Rivers' capital structure contained
 10 less financial risk than that of the Utility Proxy Group. Can the lesser
 11 financial risk of Confluence Rivers' capital structure be quantified?

- A. Yes. The relationship between leverage and financial risk has been formalized by
   financial economists. Franco Modigliani and Merton Miller demonstrated that the
   cost of common equity may be expressed as:
- 15

21

$$k_{e,L} = k_{e,U} + (k_{e,U} - k_d)(1 - T)(D/E)$$

16 Where:  $k_{e,U} = Cost of common equity for an unlevered firm$ 

- 17  $k_{e,L} = Cost of common equity for a levered firm$
- $k_d = Cost of debt (interest rate)$
- 19 D = Level of debt
- 20 E = Level of equity
  - T = Income tax rate

The equation above expresses the cost of common equity for a levered firm as the cost of common equity for an unlevered firm, which reflects business risk only, plus a premium for financial risk.

- 1 Robert Hamada<sup>55</sup> proposed an equivalent leverage relationship in the 2 context of the CAPM equation. Here, because the only firm-specific factor used is 3 beta, the relationship between leverage and the cost of common equity reduces to 4 a relationship between beta and leverage:<sup>56</sup>
- 5

 $\beta_{\rm L} = \beta_{\rm U} [\textbf{1} + (\textbf{1} - T)] \frac{D}{E}$ 

6 Where:  $\beta_{L}$  = the levered equity beta

7  $\beta_{U}$  = the unlevered equity beta

8 Confluence Rivers' capital structure consists of 31.44% long-term debt and 9 68.56% common equity. As shown on page 1 of Schedule DWD-9, the 2021 10 capital structure of the Utility Proxy Group company with the highest (top of the 11 range) common equity ratio consisted of 62.44% common equity.

Also, as discussed above, financial risk, or leverage, affects the cost of capital, including the cost of common equity; the greater the degree of financial leverage, the greater the concentration of business risk on common shareholders, increasing their required return to compensate them for bearing that risk. Indications of the magnitude of financial leverage's effect on the common equity cost rate is given by the Modigliani-Miller ("M&M") method and the Hamada equation, which are derived on pages 1 and 2 of Schedule DWD-9, respectively.

<sup>&</sup>lt;sup>55</sup> R. S. Hamada, "The Effect of the Firm's Capital Structure on the Systematic Risk of Common Stocks", *The Journal of Finance* 27 No. 2, May 1972, at pages 435 to 452.

<sup>&</sup>lt;sup>56</sup> The leverage relationship in the Hamada equation is equivalent to that in the M&M method in that if the assumptions for leverage, capital costs and income tax rate used in the M&M method are applied to the Hamada equation, the resulting levered equity beta will produce the same cost of common equity using the CAPM. However, the Hamada equation is more restrictive than the M&M method, since the Hamada equation assumes that the beta of debt is zero. Under that assumption, the cost of corporate debt is identical to the risk-free rate of return. Whenever that assumption does not hold (which generally is the case), the cost of common equity measured from the Hamada equation will differ from the M&M method.

The M&M method holds the pretax weighted average cost of capital 1 ("WACC") constant regardless of capital structure. As shown and explained on 2 3 page 1 of Schedule DWD-9, applying the M&M method results in indicated adjustments to the common equity cost rate of negative 0.53% relative to the 4 common equity cost rate, based on the next financially risky Water Proxy 5 Company. In other words, applying a common equity cost rate of 10.86% (which 6 reflects the financial risk of the high end of the Water Proxy Group's 2021 capital 7 structure, as represented by the midpoint of its unadjusted indicated return on 8 equity range), results in a pretax WACC of 11.42% as shown in page 1 of Schedule 9 DWD-9. Applying that 11.42% pretax WACC to Confluence Rivers' proposed 10 capital structure, which contains less financial risk than the Utility Proxy Group's 11 lowest risk capital structure, results in a common equity cost rate of 10.34%. This 12 indicates a downward adjustment of 0.53% based on the differences in financial 13 14 risk between Confluence Rivers and the Utility Proxy Group.

15

#### Table 10: Summary of the Calculation of the M&M Financial Adjustment<sup>57</sup>

	<u>Utility</u> <u>Proxy</u> <u>Group</u>
ROE based on High End of Proxy Group Equity Ratios (Midpoint of unadjusted ROE Range)	10.86%
Resulting Pre-Tax WACC	11.42%
ROE based on Pre-Tax WACC applied to Confluence Rivers' Proposed Capital Structure	10.34%
Indicated Financial Risk Adjustment	<u>-0.53%</u>

16

Applying the Hamada equation, which involves un-levering the Utility Proxy Groups' betas based on the Utility Proxy Group's least financially risky actual

<sup>&</sup>lt;sup>57</sup> As shown on page 1 of Schedule DWD-9.

1	capital structure, then re-levering the beta using Confluence Rivers' recommended
2	capital structure, and recalculating the Utility Proxy Group's CAPM, is shown and
3	explained on page 2 of Schedule DWD-9. The Hamada equation results in a
4	financial risk adjustment of -0.50% for the Utility Proxy Group, which is the
5	difference between the CAPM result for the Utility Proxy Group applicable to its
6	capital structure, 11.74% (line 9), and the CAPM result applicable to Confluence
7	Rivers' recommended capital structure, 11.24% (line 10), respectively.

#### 8 Table 11: Summary of the Calculation of the Hamada Financial Adjustment<sup>58</sup>

	<u>Utility</u> <u>Proxy</u> <u>Group</u>
Long-Term Debt (Least Risky Proxy Company)	37.56%
Common Equity (Least Risky Proxy Company)	62.44%
Proxy Group Beta	0.78
Un-Levered Beta	0.54
Re-Levered Beta	0.73
Risk-Free Rate	3.96%
CAPM Based on Proxy Group Capital Structure	11.74%
CAPM Based on Confluence Rivers' Capital Structure (Re-Levered Beta)	11.24%
Indicated Financial Risk Adjustment	<u>-0.50%</u>

9

Therefore, a downward adjustment of 0.51% (the average adjustment based on the M&M and Hamada applications) to the indicated range of common equity cost rate is necessary to reflect the greater financial risk inherent in Confluence Rivers' recommended capital structure ratios compared with that of the Utility Proxy Group.

As shown on page 2 of Schedule DWD-9.

Q. What is the indicated range of common equity cost rates after adjustment for 1 the Confluence Rivers' smaller size and lesser financial risk relative to the 2 3 Utility Proxy Group? A. After applying the 1.00% size adjustment and the negative 0.51% financial risk 4 adjustment to the indicated range of common equity cost rates between 10.36% 5 and 11.36%, based on the Utility Proxy Group results, a range of common equity 6 cost rates between 10.85% and 11.85% is applicable to Confluence Rivers. 7 8 Χ. CONCLUSION 9 Using the just and reasonable standard applicable in utility rate cases, what Q. 10 11 is your recommended return on investor-supplied capital for Confluence **Rivers?** 12 Α. Given the Company's actual capital structure which consists of 31.44% long-term 13

debt at an embedded debt cost rate of 6.60% and 68.56% common equity at my 14 recommended ROE of 11.35%, I conclude that an appropriate return on investor-15 supplied capital for the Company is 9.86%. A common equity cost rate of 11.35% 16 is consistent with the Hope and Bluefield standard of a just and reasonable return 17 which ensures the integrity of presently invested capital and enables the attraction 18 19 of needed new capital on reasonable terms. It also ensures that Confluence Rivers will be able to continue providing safe, adequate, and reliable service to the benefit 20 of its customers. Thus, it balances the interests of both customers and the 21 22 Company.

- 23 Q. Does this conclude your Direct Testimony?
- A. Yes, it does.

#### BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Confluence Rivers Utility Operating Company, Inc.'s Request for Authority to Implement a General Rate Increase for Water Service and Sewer Service Provided in Missouri Service Areas.

File No. WR-2023-0006 File No. SR-2023-0007

#### AFFIDAVIT OF DYLAN D'ASCENDIS

STATE OF NEW JERSEY	)	
	)	SS
COUNTY OF	)	

Dylan D'Ascendis, of lawful age and being first duly sworn, deposes and states:

1. My name is Dylan D'Ascendis. I am a Partner with ScottMadden, Inc. I have been retained to provide testimony in this proceeding by Confluence Rivers Utility Operating Company, LLC.

2. Attached hereto and made a part hereof for all purposes is my direct testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Subscribed and sworn to me this  $l_{\ell}$  day of December, 2022

Margaret & Claney Notary Public

My commission expires 6/9/2024.

Margaret A Clancy Notary Public of New Jersey My Commission Expires 6/9/2024



#### Summary

Dylan is an experienced consultant and a Certified Rate of Return Analyst (CRRA) and Certified Valuation Analyst (CVA). Dylan joined ScottMadden in 2016 and has become a leading expert witness with respect to cost of capital and capital structure. He has served as a consultant for investor-owned and municipal utilities and authorities for 14 years. Dylan has testified as an expert witness on over 125 occasions regarding rate of return, cost of service, rate design, and valuation before more than 35 regulatory jurisdictions in the United States and Canada, an American Arbitration Association panel, and the Superior Court of Rhode Island. He also maintains the benchmark index against which the Hennessy Gas Utility Mutual Fund performance is measured. Dylan holds a B.A. in economic history from the University of Pennsylvania and an M.B.A. with concentrations in finance and international business from Rutgers University.

#### Areas of Specialization

- Regulation and Rates
- Rate of Return
- Valuation
- Mutual Fund Benchmarking
- Capital Market Risk
- Regulatory Strategy
- Cost of Service

#### Recent Expert Testimony Submission/Appearance

- Regulatory Commission of Alaska Capital Structure
- Federal Energy Regulatory Commission Rate of Return
- Public Utility Commission of Texas Return on Equity
- Hawaii Public Utilities Commission Cost of Service / Rate Design
- Pennsylvania Public Utility Commission Valuation

#### **Recent Assignments**

- Provided expert testimony on the cost of capital for ratemaking purposes before numerous state utility regulatory agencies
- Sponsored valuation testimony for a large municipal water company in front of an American Arbitration Association Board to justify the reasonability of their lease payments to the City
- Co-authored a valuation report on behalf of a large investor-owned utility company in response to a new state regulation which allowed the appraised value of acquired assets into rate base

#### **Recent Articles and Speeches**

- Co-Author of: "Decoupling, Risk Impacts and the Cost of Capital", co-authored with Richard A. Michelfelder, Ph.D., Rutgers University and Pauline M. Ahern. The Electricity Journal, March, 2020
- Co-Author of: "Decoupling Impact and Public Utility Conservation Investment", co-authored with Richard A. Michelfelder, Ph.D., Rutgers University and Pauline M. Ahern. Energy Policy Journal, 130 (2019), 311-319
- "Establishing Alternative Proxy Groups", before the Society of Utility and Regulatory Financial Analysts: 51st Financial Forum, April 4, 2019, New Orleans, LA
- "Past is Prologue: Future Test Year", Presentation before the National Association of Water Companies 2017 Southeast Water Infrastructure Summit, May 2, 2017, Savannah, GA.
- Co-author of: "Comparative Evaluation of the Predictive Risk Premium Model<sup>™</sup>, the Discounted Cash Flow Model and the Capital Asset Pricing Model", co-authored with Richard A. Michelfelder, Ph.D., Rutgers University, Pauline M. Ahern, and Frank J. Hanley, The Electricity Journal, May, 2013
- "Decoupling: Impact on the Risk and Cost of Common Equity of Public Utility Stocks", before the Society of Utility and Regulatory Financial Analysts: 45th Financial Forum, April 17-18, 2013, Indianapolis, IN



Sponsor	Date	Case/Applicant	Docket No.	Subject
Regulatory Commission of Alaska				• 
ENSTAR Natural Gas Company	08/22	ENSTAR Natural Gas Company	Docket No. TA334-4	Rate of Return
Cook Inlet Natural Gas Storage Alaska, LLC	07/21	Cook Inlet Natural Gas Storage Alaska, LLC	Docket No. TA45-733	Capital Structure
Alaska Power Company	09/20			Capital Structure
Alaska Power Company	07/16	Alaska Power Company	Docket No. TA857-2	Rate of Return
Alberta Utilities Commission	1			1
AltaLink, L.P., and EPCOR Distribution & Transmission, Inc.	01/20	AltaLink, L.P., and EPCOR Distribution & Transmission, Inc.	2021 Generic Cost of Capital, Proceeding ID. 24110	Rate of Return
Arizona Corporation Commission				
EPCOR Water Arizona, Inc.	08/22	EPCOR Water Arizona, Inc.	Docket No. WS-01303A-22- 0236	Rate of Return
EPCOR Water Arizona, Inc.	06/20	EPCOR Water Arizona, Inc.	Docket No. WS-01303A-20- 0177	Rate of Return
Arizona Water Company	12/19	Arizona Water Company – Western Group	Docket No. W-01445A-19-0278	Rate of Return
Arizona Water Company	08/18	Arizona Water Company – Northern Group	Docket No. W-01445A-18-0164	Rate of Return
Arkansas Public Service Commissi	on		1	I
Southwestern Electric Power Co.	07/21	Southwestern Electric Power Co.	Docket No. 21-070-U	Return on Equity
CenterPoint Energy Resources Corp.	05/21	CenterPoint Arkansas Gas	Docket No. 21-004-U	Return on Equity
Colorado Public Utilities Commissi	on			
Atmos Energy Corporation	08/22	Atmos Energy Corporation	Docket No. 22AL-0348G	Rate of Return
Summit Utilities, Inc.	04/18	Colorado Natural Gas Company	Docket No. 18AL-0305G	Rate of Return
Atmos Energy Corporation	06/17	Atmos Energy Corporation	Docket No. 17AL-0429G	Rate of Return
Delaware Public Service Commission	on			
Delmarva Power & Light Co.	01/22	Delmarva Power & Light Co.	Docket No. 22-002 (Gas)	Return on Equity
Delmarva Power & Light Co.	11/20	Delmarva Power & Light Co.	Docket No. 20-0149 (Electric)	Return on Equity
Delmarva Power & Light Co.	10/20	Delmarva Power & Light Co.	Docket No. 20-0150 (Gas)	Return on Equity
Tidewater Utilities, Inc.	11/13	Tidewater Utilities, Inc.	Docket No. 13-466	Capital Structure
Public Service Commission of the L			·	
Washington Gas Light Company	04/22	Washington Gas Light Company	Formal Case No. 1169	Rate of Return
Washington Gas Light Company	09/20	Washington Gas Light Company	Formal Case No. 1162	Rate of Return
Federal Energy Regulatory Commis	sion		•	
LS Power Grid California, LLC	10/20	LS Power Grid California, LLC	Docket No. ER21-195-000	Rate of Return
Florida Public Service Commission			· ·	·
Tampa Electric Company	04/21	Tampa Electric Company	Docket No. 20210034-EI	Return on Equity
Peoples Gas System	09/20	Peoples Gas System	Docket No. 20200051-GU	Rate of Return
Utilities, Inc. of Florida	06/20	Utilities, Inc. of Florida	Docket No. 20200139-WS	Rate of Return
Hawaii Public Utilities Commission			·	·
Launiupoko Irrigation Company, Inc.	12/20	Launiupoko Irrigation Company, Inc.	Docket No. 2020-0217 / Transferred to 2020-0089	Capital Structure
Lanai Water Company, Inc.	12/19	Lanai Water Company, Inc.	Docket No. 2019-0386	Cost of Service / Rate Design



Sponsor	Date	Case/Applicant	Docket No.	Subject
				Cost of Service /
Manele Water Resources, LLC	08/19	Manele Water Resources, LLC	Docket No. 2019-0311	Rate Design
Kaupulehu Water Company	02/18	Kaupulehu Water Company		
Aqua Engineers, LLC	05/17	Puhi Sewer & Water Company	Docket No. 2017-0118	Cost of Service / Rate Design
Hawaii Resources, Inc.	09/16	Laie Water Company	Docket No. 2016-0229	Cost of Service / Rate Design
Illinois Commerce Commission	•			
Utility Services of Illinois, Inc.	02/21	Utility Services of Illinois, Inc.	Docket No. 21-0198	Rate of Return
Ameren Illinois Company d/b/a Ameren Illinois	07/20	Ameren Illinois Company d/b/a Ameren Illinois	Docket No. 20-0308	Return on Equity
Utility Services of Illinois, Inc.	11/17	Utility Services of Illinois, Inc.	Docket No. 17-1106	Cost of Service / Rate Design
Aqua Illinois, Inc.	04/17	Aqua Illinois, Inc.	Docket No. 17-0259	Rate of Return
Utility Services of Illinois, Inc.	04/15	Utility Services of Illinois, Inc.	Docket No. 14-0741	Rate of Return
Indiana Utility Regulatory Commiss				
manufactory regulatory commiss		Agua Indiana, Inc. Aboite		
Aqua Indiana, Inc.	03/16	Wastewater Division	Docket No. 44752	Rate of Return
Twin Lakes, Utilities, Inc.	08/13	Twin Lakes, Utilities, Inc.	Docket No. 44388	Rate of Return
Kansas Corporation Commission	1			
Atmos Energy Corporation	07/19	Atmos Energy Corporation	19-ATMG-525-RTS	Rate of Return
Kentucky Public Service Commiss	ion			
Water Service Corporation of KY	06/22	Water Service Corporation of KY	2022-00147	Rate of Return
Atmos Energy Corporation	07/21	Atmos Energy Corporation	2021-00304	PRP Rider Rate
Atmos Energy Corporation	06/21	Atmos Energy Corporation	2021-00214	Rate of Return
Duke Energy Kentucky, Inc.	06/21	Duke Energy Kentucky, Inc.	2021-00190	Return on Equity
Bluegrass Water Utility Operating Company	10/20	Bluegrass Water Utility Operating Company	2020-00290	Return on Equity
Louisiana Public Service Commiss	ion			
Utilities, Inc. of Louisiana	05/21	Utilities, Inc. of Louisiana	Docket No. U-36003	Rate of Return
Southwestern Electric Power Company	12/20	Southwestern Electric Power Company	Docket No. U-35441	Return on Equity
Atmos Energy	04/20	Atmos Energy	Docket No. U-35535	Rate of Return
Louisiana Water Service, Inc.	06/13	Louisiana Water Service, Inc.	Docket No. U-32848	Rate of Return
Maine Public Utilities Commission				
Summit Natural Gas of Maine, Inc.	03/22	Summit Natural Gas of Maine, Inc.	Docket No. 2022-00025	Rate of Return
The Maine Water Company	09/21	The Maine Water Company	Docket No. 2021-00053	Rate of Return
Maryland Public Service Commissi				
Washington Gas Light Company	08/20	Washington Gas Light Company	Case No. 9651	Rate of Return
FirstEnergy, Inc.	08/18	Potomac Edison Company	Case No. 9490	Rate of Return
Massachusetts Department of Pub				· · · · · · · · · · · · · · · · · · ·
Unitil Corporation	12/19	Fitchburg Gas & Electric Co. (Elec.)	D.P.U. 19-130	Rate of Return
Unitil Corporation	12/19	Fitchburg Gas & Electric Co. (Gas)	D.P.U. 19-131	Rate of Return
Liberty Utilities	07/15	Liberty Utilities d/b/a New England Natural Gas Company	Docket No. 15-75	Rate of Return
Minnesota Public Utilities Commiss				
Northern States Power Company	11/01	Northern States Power Company	Docket No. G002/GR-21-678	Return on Equity
Northern States Power Company	10/21	Northern States Power Company	Docket No. E002/GR-21-630	Return on Equity



Sponsor	Date	Case/Applicant	Docket No.	Subject	
Northern States Power Company	11/20	Northern States Power Company	Docket No. E002/GR-20-723	Return on Equity	
Mississippi Public Service Commis	ssion				
Great River Utility Operating Co.	07/22	Great River Utility Operating Co.	Docket No. 2022-UN-86	Rate of Return	
Atmos Energy	03/19	Atmos Energy	Docket No. 2015-UN-049	Capital Structure	
Atmos Energy	07/18	Atmos Energy Docket No. 2015-UN-049		Capital Structure	
Missouri Public Service Commissi	on	·			
Spire Missouri, Inc.	12/20	Spire Missouri, Inc.	Case No. GR-2021-0108	Return on Equity	
Indian Hills Utility Operating Company, Inc.	10/17	Indian Hills Utility Operating Company, Inc.	Case No. SR-2017-0259	Rate of Return	
Raccoon Creek Utility Operating Company, Inc.	09/16	Raccoon Creek Utility Operating Company, Inc.			
Public Utilities Commission of New	rada				
Southwest Gas Corporation	09/21	Southwest Gas Corporation	Docket No. 21-09001	Return on Equity	
Southwest Gas Corporation	08/20	Southwest Gas Corporation	Docket No. 20-02023	Return on Equity	
New Hampshire Public Utilities Co	mmission				
Aquarion Water Company of New Hampshire, Inc.	12/20	Aquarion Water Company of New Hampshire, Inc.	Docket No. DW 20-184	Rate of Return	
New Jersey Board of Public Utilitie	s				
Middlesex Water Company	05/21	Middlesex Water Company	Docket No. WR21050813	Rate of Return	
Atlantic City Electric Company	12/20	Atlantic City Electric Company	Docket No. ER20120746	Return on Equity	
FirstEnergy	02/20	Jersey Central Power & Light Co.	Docket No. ER20020146	Rate of Return	
Aqua New Jersey, Inc.	12/18	Aqua New Jersey, Inc.	Docket No. WR18121351	Rate of Return	
Middlesex Water Company	10/17	Middlesex Water Company	Docket No. WR17101049	Rate of Return	
Middlesex Water Company	03/15	Middlesex Water Company	Docket No. WR15030391	Rate of Return	
The Atlantic City Sewerage Company	10/14	The Atlantic City Sewerage Company	Docket No. WR14101263	Cost of Service / Rate Design	
Middlesex Water Company	11/13	Middlesex Water Company	Docket No. WR1311059	Capital Structure	
New Mexico Public Regulation Con	nmission	·			
Southwestern Public Service Co.	01/21	Southwestern Public Service Co.	Case No. 20-00238-UT	Return on Equity	
North Carolina Utilities Commissio	n				
Carolina Water Service, Inc.	07/22	Carolina Water Service, Inc.	Docket No. W-354 Sub 400	Rate of Return	
Aqua North Carolina, Inc.	06/22	Aqua North Carolina, Inc.	Docket No. W-218 Sub 573	Rate of Return	
Carolina Water Service, Inc.	07/21	Carolina Water Service, Inc.	Docket No. W-354 Sub 384	Rate of Return	
Piedmont Natural Gas Co., Inc.	03/21	Piedmont Natural Gas Co., Inc.	Docket No. G-9, Sub 781	Return on Equity	
Duke Energy Carolinas, LLC	07/20	Duke Energy Carolinas, LLC	Docket No. E-7, Sub 1214	Return on Equity	
Duke Energy Progress, LLC	07/20	Duke Energy Progress, LLC	Docket No. E-2, Sub 1219	Return on Equity	
Aqua North Carolina, Inc.	12/19	Aqua North Carolina, Inc.	Docket No. W-218 Sub 526	Rate of Return	
Carolina Water Service, Inc.	06/19	Carolina Water Service, Inc.	Docket No. W-354 Sub 364	Rate of Return	
Carolina Water Service, Inc.	09/18	Carolina Water Service, Inc.	Docket No. W-354 Sub 360	Rate of Return	
Aqua North Carolina, Inc.	07/18	Aqua North Carolina, Inc.	Docket No. W-218 Sub 497	Rate of Return	
North Dakota Public Service Comm	nission				
Northern States Power Company	09/21	Northern States Power Company	Case No. PU-21-381	Rate of Return	
Northern States Power Company	11/20	Northern States Power Company	Case No. PU-20-441	Rate of Return	
Public Utilities Commission of Ohi	0				
Duke Energy Ohio, Inc.	10/21	Duke Energy Ohio, Inc.	Case No. 21-887-EL-AIR	Return on Equity	
Aqua Ohio, Inc.	07/21	Aqua Ohio, Inc.	Case No. 21-0595-WW-AIR	Rate of Return	
Aqua Onio, mc.	01721	, iqua orno, ino.			



Sponsor	Date	Case/Applicant	Docket No.	Subject			
Pennsylvania Public Utility Commi	ssion						
		Borough of Ambler – Bureau of					
Borough of Ambler	06/22	Water	Docket No. R-2022-3031704	Rate of Return			
Citizens' Electric Company of							
Lewisburg	05/22	C&T Enterprises	Docket No. R-2022-3032369	Rate of Return			
Valley Energy Company	05/22	C&T Enterprises	Docket No. R-2022-3032300	Rate of Return			
Community Utilities of Pennsylvania,	04/04	Community Utilities of Pennsylvania,	Destat No. D 0004 0005007	Data of Datum			
Inc.	04/21		Docket No. R-2021-3025207	Rate of Return			
Vicinity Energy Philadelphia, Inc.	04/21	Vicinity Energy Philadelphia, Inc.	Docket No. R-2021-3024060	Rate of Return			
Delaware County Regional Water Control Authority	02/20	Delaware County Regional Water Control Authority	Docket No. A-2019-3015173	Valuation			
	02/20	,		Rate of Return			
Valley Energy, Inc.							
Wellsboro Electric Company	07/19	C&T Enterprises	Docket No. R-2019-3008208	Rate of Return			
Citizens' Electric Company of Lewisburg	07/19	C&T Enterprises	Docket No. R-2019-3008212	Rate of Return			
Steelton Borough Authority	01/19	Steelton Borough Authority	Docket No. A-2019-3006880	Valuation			
Mahoning Township, PA	01/13	Mahoning Township, PA	Docket No. A-2018-3003519	Valuation			
SUEZ Water Pennsylvania Inc.	04/18	SUEZ Water Pennsylvania Inc.	Docket No. R-2018-000834	Rate of Return			
Columbia Water Company	04/10	Columbia Water Company	Docket No. R-2017-2598203	Rate of Return			
Veolia Energy Philadelphia, Inc.	06/17	Veolia Energy Philadelphia, Inc.	Docket No. R-2017-2593142	Rate of Return			
Emporium Water Company	07/14	Emporium Water Company	Docket No. R-2014-2402324	Rate of Return			
Columbia Water Company	07/14	Columbia Water Company	Docket No. R-2013-2360798	Rate of Return			
	07/13		DUCKELINU. K-2013-2300790				
				Capital Structure / Long-Term Debt			
Penn Estates Utilities, Inc.	12/11	Penn Estates, Utilities, Inc.	Docket No. R-2011-2255159	Cost Rate			
South Carolina Public Service Com	mission						
Blue Granite Water Co.	12/19	Blue Granite Water Company	Docket No. 2019-292-WS	Rate of Return			
Carolina Water Service, Inc.	02/18	Carolina Water Service, Inc.	Docket No. 2017-292-WS	Rate of Return			
Carolina Water Service, Inc.	06/15	Carolina Water Service, Inc.	Docket No. 2015-199-WS	Rate of Return			
Carolina Water Service, Inc.	11/13	Carolina Water Service, Inc.	Docket No. 2013-275-WS	Rate of Return			
United Utility Companies, Inc.	09/13	United Utility Companies, Inc.	Docket No. 2013-199-WS	Rate of Return			
Utility Services of South Carolina,		Utility Services of South Carolina,					
Inc.	09/13	Inc.	Docket No. 2013-201-WS	Rate of Return			
Tega Cay Water Services, Inc.	11/12	Tega Cay Water Services, Inc.	Docket No. 2012-177-WS	Capital Structure			
South Dakota Public Service Commis	sion						
Northern States Power Company	06/22	Northern States Power Company	Docket No. EL22-017	Rate of Return			
Tennessee Public Utility Commissi	on						
Piedmont Natural Gas Company	07/20	Piedmont Natural Gas Company	Docket No. 20-00086	Return on Equity			
Public Utility Commission of Texas							
Oncor Electric Delivery Co. LLC	05/22	Oncor Electric Delivery Co. LLC	Docket No. 53601	Return on Equity			
Southwestern Public Service Co.	02/21	Southwestern Public Service Co.	Docket No. 51802	Return on Equity			
Southwestern Electric Power Co.	10/20	Southwestern Electric Power Co.	Docket No. 51415	Rate of Return			
Virginia State Corporation Commis	sion						
Washington Gas Light Company	06/22	Washington Gas Light Company	PUR-2022-00054	Return on Equity			
Virginia Natural Gas, Inc.	04/21	Virginia Natural Gas, Inc.	PUR-2020-00095	Return on Equity			
Massanutten Public Service		Massanutten Public Service		···· ······			
				1			
Corporation	12/20	Corporation	PUE-2020-00039	Return on Equity			



#### Appendix A - *Resume & Testimony Listing of:* Dylan W. D'Ascendis, CRRA, CVA Partner

Sponsor	Date	Case/Applicant	Docket No.	Subject	
WGL Holdings, Inc.	07/18	Washington Gas Light Company	PUR-2018-00080	Rate of Return	
Atmos Energy Corporation	05/18	Atmos Energy Corporation	Atmos Energy Corporation PUR-2018-00014 Ra		
Aqua Virginia, Inc.	07/17	Aqua Virginia, Inc.	PUR-2017-00082	Rate of Return	
Massanutten Public Service Corp.	08/14	Massanutten Public Service Corp. PUE-2014-00035		Rate of Return / Rate Design	
Public Service Commission of Wes	t Virginia				
Monongahela Power Company and The Potomac Edison Company	12/21	Monongahela Power Company and The Potomac Edison Company	Case No. 21-0857-E-CN (ELG)	Return on Equity	
Monongahela Power Company and The Potomac Edison Company	11/21	Monongahela Power Company and The Potomac Edison Company	Case No. 21-0813-E-P (Solar)	Return on Equity	

#### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Table of Contents Supporting Schedules Accompanying the Direct Testimony of Dylan W. D'Ascendis, CRRA, CVA

<u>Schedule</u>

	<u></u>
Summary of Cost of Capital and Fair Rate of Return	DWD-1
Financial Profile of and Capital Structures of the Utility Proxy Group	DWD-2
Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model	DWD-3
Indicated Common Equity Cost Rate Using the Risk Premium Model	DWD-4
Indicated Common Equity Cost Rate Using the Capital Asset Pricing Model	DWD-5
Basis of Selection for the Non-Price Regulated Companies Comparable in Total Risk to the Utility Proxy Group	DWD-6
Cost of Common Equity Models Applied to the Non-Price Regulated Proxy Group	DWD-7
Estimated Market Capitalization for Confluence Rivers (MO) Utility Operating Company, Inc. and the Utility Proxy Group	DWD-8
Calculation of the Financial Risk Adjustment	DWD-9

#### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Recommended Capital Structure and Cost Rates <u>for Ratemaking Purposes</u>

Type Of Capital	Ratios (1)	Cost Rate	Weighted Cost Rate
Long-Term Debt Common Equity	31.44% 68.56%	6.60% (1) 11.35% (2)	2.08% 7.78%
Total	100.00%	=	9.86%

Notes:

(1) Company provided.

(2) From page 2 of this Schedule.

#### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> <u>Brief Summary of Common Equity Cost Rate</u>

Line No.	Principal Methods	Proxy Group of Six Water Companies
1.	Discounted Cash Flow Model (DCF) (1)	9.73%
2.	Risk Premium Model (RPM) (2)	11.84%
3.	Capital Asset Pricing Model (CAPM) (3)	12.00%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	11.97%
5.	Indicated Common Equity Cost Rate before Adjustment for Unique Risk	10.36% - 11.36%
7.	Business Risk Adjustment (5)	1.00%
6.	Financial Risk Adjustment (6)	-0.51%
8.	Indicated Common Equity Cost Rate after Adjustment	10.85% - 11.85%
9.	Recommended Common Equity Cost Rate	11.35%
Notes:	<ol> <li>From page 1 of Schedule DWD-3.</li> <li>From page 1 of Schedule DWD-4.</li> <li>From page 1 of Schedule DWD-5.</li> <li>From page 1 of Schedule DWD-7.</li> </ol>	

- (4) From page 1 of Schedule DWD-7.
  (5) Business risk adjustment to reflect Confluence Rivers' unique risk compared to the Utility Proxy Group as detailed in the accompanying Direct Testimony.
- (6) From Schedule DWD-9.

#### Proxy Group of Six Water Companies CAPITALIZATION AND FINANCIAL STATISTICS (1) 2017 - 2021, Inclusive

	2021		2020	(M	2019 IILLIONS OF DOLLA	RS)	<u>2018</u>		2017	
Capitalization Statistics				(M	ILLIONS OF DOLLA					
Amount of Capital Employed										
Total Permanent Capital	\$5,897.865		\$5,348.616		\$4,493.345		\$3,706.817		\$3,275.675	
Short-Term Debt	\$155.749		\$340.249	_	\$220.672	_	\$214.758	_	\$215.958	
Total Capital Employed	\$6,053.614		\$5,688.865	-	\$4,714.017	_	\$3,921.575	-	\$3,491.633	
Indicated Average Capital Cost Rates (2)										
Total Debt	3.51	%	3.78				4.55		4.62 %	
Preferred Stock	5.76	%	5.76	%	5.84	%	5.92	%	5.91 %	
Capital Structure Ratios										<u>5 YEAR</u> AVERAGE
Based on Total Permanent Capital:	50.40		50.00	~ ~	15.01	o.,	15 50	<i></i>		1011 0/
Long-Term Debt Preferred Stock	50.40 0.05	%	50.92 0.06	%	47.81 0.06	%	45.58 0.11	%	46.01 % 0.12	48.14 % 0.08
Common Equity	0.05 49.55		0.06 49.02		0.06 52.13		0.11 54.31		0.12 53.87	0.08 51.78
Total	49.55	- 0/ -	100.00	- 0/		oz —	100.00	-04	100.00 %	100.00 %
10(a)	100.00	- 90	100.00	- 70	100.00	<sup>90</sup>	100.00	- 90	100.00 %	100.00 %
Based on Total Capital:										
Total Debt, Including Short-Term Debt	52.56	%	54.67	%	51.78	%	49.31	%	49.87 %	51.64 %
Preferred Stock	0.05		0.06		0.07		0.10		0.11	0.07
Common Equity	47.39		45.28	_	48.16	_	50.60	_	50.02	48.29
Total	100.00	%	100.00	%	100.00	%	100.00	%	100.00 %	100.00 %
Financial Statistics										
Financial Ratios - Market Based										
Earnings / Price Ratio	3.20	%	3.24	%	2.64	%	3.33	%	3.79 %	3.24 %
Market / Average Book Ratio	352.63		315.40		332.39		304.57		296.61	320.32
Dividend Yield	1.67		1.83		1.77		1.97		2.02	1.85
Dividend Payout Ratio	52.51		56.85		74.00		59.40		54.53	59.46
Rate of Return on Average Book Common Equity	11.22	%	10.24	%	9.22	%	9.99	%	11.34 %	10.40 %
<u>Total Debt / EBITDA (3)</u>	5.05	x	5.57	x	5.92	x	4.37	x	3.48 x	4.88 x
Funds from Operations / Total Debt (4)	11.39	%	12.12	%	14.53	%	22.17	%	23.56 %	16.75 %
<u>Total Debt / Total Capital</u>	52.56	%	54.67	%	51.78	%	49.31	%	49.87 %	51.64 %
Notes:										

(1) All capitalization and financial statistics for the group are the arithmetic average of the achieved results for each individual company in the group, and are based upon financial statements as originally reported in each year.

(2) Computed by relating actual total debt interest or preferred stock dividends booked to average of beginning and ending total debt or preferred stock reported to be outstanding.

(3) Total debt relative to EBITDA (Earnings before Interest, Income Taxes, Depreciation and Amortization).

(4) Funds from operations (sum of net income, depreciation, amortization, net deferred income tax and investment tax credits, less total AFUDC) plus interest charges as a percentage of total debt.

Source of Information: Company Annual Forms 10-K

Capital	Structure Based	upon Total Pe	rmanent Capi	tal for the		
		p of Six Water				
		7 - 2021, Inclus				
	2021	2020	2010	2010	2017	<u>5 YEAR</u>
	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>AVERAGE</u>
American States Water Company						
Long-Term Debt	37.56 %	40.72 %	31.87 %	36.54 %	37.75 %	36.89 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	62.44	59.28	68.13	63.46	62.25	63.11
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
American Water Works Company, Inc.						
Long-Term Debt	58.75 %	59.93 %	58.59 %	56.55 %	55.81 %	57.93 %
Preferred Stock	0.02	0.02	0.03	0.05	0.07	0.04
Common Equity	41.23	40.05	41.38	43.40	44.12	42.03
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
	100.00 /0	100.00 /0	100.00 /0	100.00 /0	100.00 /0	100.00 /0
California Water Service Group						
Long-Term Debt	47.28 %	46.04 %	50.90 %	52.74 %	43.40 %	48.07 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	52.72	53.96	49.10	47.26	56.60	51.93
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Essential Utilities Inc.						
Long-Term Debt	53.28 %	54.42 %	44.23 %	56.06 %	52.26 %	52.05 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	46.72	45.58	55.77	43.94	47.74	47.95
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Middlesex Water Company			12.22.07	22.24.84		
Long-Term Debt	46.87 %	44.61 %	42.20 %	38.94 %	38.65 %	42.25 %
Preferred Stock	0.30	0.33	0.37	0.59	0.64	0.45
Common Equity Total Capital	<u>52.83</u> 100.00 %	55.06 100.00 %	57.43 100.00 %	$\frac{60.47}{100.00}$ %	<u>60.71</u> 100.00 %	57.30 100.00 %
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
SIW Group						
Long-Term Debt	59.69 %	59.79 %	59.05 %	32.67 %	48.20 %	51.88 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	40.31	40.21	40.95	67.33	51.80	48.12
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Proxy Group of Six Water Companies						
Long-Term Debt	50.57 %	50.92 %	47.81 %	45.58 %	46.01 %	48.18 %
Preferred Stock	0.05	0.06	0.06	0.11	0.12	0.08
Common Equity	49.38	49.02	52.13	54.31	53.87	51.74
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %

Source of Information Annual Forms 10-K

[2]	Indicated Common Equity Cost Rate (5)	6.87 % 8.34 10.90 10.21 5.08 14.28	9.28 %	9.28 %	9.28 %
[9]	Adjusted Dividend Yield (4)	1.92 % 1.87 1.80 2.58 2.38 2.38	Average	Median	ınd Median
[5]	Average Projected Five Year Growth in EPS (3)	4.95 % 6.47 9.10 7.63 3.60 11.90			Average of Mean and Median
[4]	Yahoo! Finance Projected Five Year Growth in EPS	4.40 % 8.30 11.70 6.80 2.70 9.80			
[3]	Zack's Five Year Projected Growth Rate in EPS	NA %810 8.10 8.10 6.10 NA NA			
[2]	Value Line Projected Five Year Growth in EPS (2)	5.50 % 3.00 6.50 10.00 4.50 14.00			
[1]	Average Dividend Yield (1)	1.87 % 1.81 1.72 2.49 1.45 2.25			
	Proxy Group of Six Water Companies	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities Inc. Middlesex Water Company SJW Group			

Average of Mean and Median Excluding Middlesex Water (6)

%

10.17

%

9.73

Indicated DCF Result

NA= Not Available

Notes:

- (1) Indicated dividend at 10/31/2022 divided by the average closing price of the last 60 trading days ending 10/31/2022 for each company.
  (2) From pages 2 through 7 of this Schedule.
  (3) Average of columns 2 through 4 excluding negative growth rates.
  (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 5) x
- (5) Column 5 + column 6.
  (6) The indicated DCF cost rate of Middlesex Water Company is excluded as it is below the yield of A-rated column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for American States Water Company, 1.87% x (1+(1/2 x 4.95%)) = 1.92%.
  - public utility bonds.

www.yahoo.com Downloaded on 10/31/2022 www.zacks.com Downloaded on 10/31/2022 Value Line Investment Survey

Source of Information:

Schedule DWD-3 Page 2 of 7

AM	ER.	STA	TES	WAT		IYSE-A	WR P	ecent Rice	82.1		o <b>31</b> .	9 (Traili Medi	ng: 36.8 an: 27.0 <b>)</b>	RELATIVI P/E RATI			2.0	)%		2		
		4 Lowered		High: Low:	18.2 15.3	24.1 17.0	33.1 24.0	38.7 27.0	44.1 35.8	47.2 37.3	58.4 41.1	69.6 50.1	96.0 63.3	96.6 65.1	103.8 70.1	103.4 71.2				Price		
AFET' Echn		2 Raised 7 3 Raised 8		LEGEN 18	NDS .00 x "Ca: lative Pric	sh Flow" p e Strength	sh														12	
		<ul> <li>Haised 8</li> <li>Market)</li> </ul>	/19/22	2-for-1 sp Options:	lit 9/13								լու			     <sub> 11</sub>  !●						
		get Price	Range	Shaded	area indic	ates recess	ion		mann			L. III IIII	100 <sup>00</sup>	վուսիու		<u> </u>						
w-Hi	-	dpoint (%	to Mid)						յուսվ	1 <sub>111</sub> 11 <sub>11</sub> 1	որը	10.			/						+48	
1-\$13		03 (25%)					ور ارور	, որով՝	1010													
			nn'l Total			սոս <sup>վով</sup> ՝	<u>, , , ,</u>							••								
gh	Price 95 (	Gain (+15%)	Return 6%	1.11111 <u>- 1</u>	araque				···· ···	••••••••••••			*****		·	·					10 12	
w stitu	70 tional	(-15%) Decisio	<u>-1%</u> ns	•••••••••	•••••	••••	•••••••••	•••••• <sup>••</sup>										% TO	T. RETUR	N 8/22		
Buy	4Q2021 157		202022 128	Percent			1							1				1 yr.	sтоск -8.4	INDEX -12.0	+	
Sell 1's(000)	117	' 121	150 26629	shares traded	16 - 8 -		n#####	Որուր		1111.1111	սիստիր				ntiitiiniini	ullin		3 yr. 5 yr.	-6.1 82.4	43.2 54.9	F	
006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023		UE LINE P	UB. LLC		
7.88 1.45	8.75 1.65		9.74 1.70	10.71 2.11	11.12 2.13	12.12 2.48	12.19 2.65	12.17 2.67	12.56 2.81	11.92 2.70	12.01 2.96	11.88 2.84	12.86 3.26	13.24 3.34	13.51 3.64	13.70 3.60	14.00 3.90		es per sh "low" per :	eh	18 4.	
.67	.81		.81	1.11	1.12	1.41	1.61	1.57	1.61	1.62	1.88	1.72	2.28	2.33	2.55	2.45	2.60	Earning	s per sh A		3	
.46 1.95	.48		.51 2.09	.52	.55 2.13	.64	.76 2.52	.83 1.89	.87 2.39	.91 3.55	.99 3.08	1.06 3.44	1.16	1.28 3.54	1.40 3.91	1.53 4.10	1.62		ecl'd per s pending p		2	
8.32	8.77		9.70	10.12	10.84	11.80	12.72	13.24	12.77	13.52	14.45	15.19	16.33	17.39	18.57	20.15	21.35		alue per si		23	
4.10	34.46		37.06	37.26	37.70	38.53	38.72	38.29 20.1	36.50 24.6	36.57 25.6	36.68 25.7	36.76 34.0	36.85	36.89 34.3	36.94 33.2	37.25	37.50		n Shs Out n'I P/E Rat		37	
27.7 1.50	24.0 1.27		1.41	15.7 1.00	15.4 .97	14.3 .91	17.2 .97	1.06	24.0 1.24	25.0 1.34	1.29	1.84	34.4 1.83	1.76	1.82	Value	ures are Line	1 3	P/E Ratio		2	
2.5%	2.5%		2.9%	3.0%	3.2%	3.1%	2.7%	2.6%	2.2%	2.2%	2.0%	1.8%	1.5%	1.6%	1.7%	estin	nates	Avg An	n'l Div'd Y	ield	2.0	
		JCTURE a 0.8 mill.			mill.	466.9 54.1	472.1 62.7	465.8 61.1	458.6 60.5	436.1 59.7	440.6 69.4	436.8 63.9	473.9 84.3	488.2 86.4	498.9 94.3	510 91.0	525 98.0	1	es (\$mill) fit (\$mill)			
	t \$446.9	mill. L	T Interes	st \$24.0 m		39.9%	36.3%	38.4%	38.4%	36.8%	36.0%	22.0%	22.6%	24.6%	24.4%	24.0%	24.0%		Tax Rate		24.0	
			39% of C	• /		2.5%								2.5%		1.0%	1.5%		% to Net I		1.	
Leases, Uncapitalized: Annual rentals \$2.6 mill. Pension Assets-12/21 \$233.5 mill.						42.2% 57.8%	39.8% 60.2%	39.1% 60.9%	41.1% 58.9%	39.4% 60.6%	38.0% 62.0%	40.5% 59.5%	44.4% 55.6%	47.2% 52.8%	46.1% 53.9%	46.5% 53.5%	45.5% 54.5%		erm Debt F n Equity F		52.0 48.0	
Oblig. \$259.8 mill. Pfd Stock None					787.0	818.4	832.6	791.5	815.3	854.9	938.4	1082.5	1216.2	1272.6	1400	1450	Total Ca	apital (\$mi		17		
			04.4			917.8 8.3%	981.5 8.9%	1003.5 8.6%	1060.8 9.0%	1150.9 8.6%	1205.0 9.3%	1296.3 7.9%	1415.7 8.9%	1512.0 8.0%	1626.0 8.3%	1720 7.5%	1800 8.0%		nt (\$mill) on Total C	an'l	20 8.0	
	on Stoc 29/22	<b>k</b> 36,956,8	324 sns.			11.9%	12.7%	12.0%	13.0%	12.1%	13.1%	11.4%	14.0%	13.5%	13.8%	12.5%	12.5%		on Shr. Eq		13.5	
ARKE		\$3.0 billi	on (Mid C	Cap)		11.9% 6.6%	12.7% 6.8%	12.0% 5.7%	13.0% 6.0%	12.1% 5.3%	13.1% 6.2%	11.4% 4.5%	14.0% 6.9%	13.5% 6.1%	13.8% 6.2%	12.5% 4.5%	12.5% 4.5%		on Com E d to Com		13.5 4.5	
URRE (\$MI		SITION	2020	2021	6/30/22	45%	47%	53%	54%	56%	52%	61%	51%	55%	55%	62%	62%	1	ds to Net F	•	66	
Cash Assets         36.7         5.0         10.8           Accts Receivable         29.2         34.4         27.1           Other         91.2         98.7         101.1           Current Assets         157.1         138.1         139.0           Accts Payable         63.8         65.9         71.9           Debt Due         4         31.4         223.9           Other						BUSINESS: American States Water Co. operates as a holding company. Through its principal subsidiary, Golden State Water Co., it supplies water to 262,770 customers in 10 California counties.       water & wastewater services to U.S. military bases through ASUS subsidiary. Sold Chaparral City Wtr. of AZ. (6/11). Employ as BlackRock, Inc. owns 17.7% of out. shares; State St., 13.7         Service areas include the metropolitan areas of Los Angeles and Orange Counties. The company also provides electricity to 24,656       Robert Sprowls. Inc: CA. Address: 630 East Foothill Blvd, S; Dimas, CA 91773. Tel.: 909-394-3600. Internet: www.aswater.com         American States Water had another       tion of its portfolio of assets set aside for																
NUA	L RATE	ES Past	Pas	st Est'd		diffi	cult	quar	ter. Ir	n the	June	e inte	rim,	the p	ensio	n pro	gram	each	quarte	er. Lo	osse	
of change (per sh)         10 Yrs.         5 Yrs.         to '25-'27           Revenues         2.5%         1.5%         5.5%           'Cash Flow''         5.5%         4.5%         5.5%					versus last year's \$0.72 showing. About r									were incurred that impacted the June period by \$0.10 a share. Moreover, we think								
Earnings 9.0% 8.5% 5.5% Dividends 9.5% 8.0% 9.0%					\$0.10 a share of the shortfall was the re- sult of old rates still being in effect. Recall writedown									hird o	quarter will cause another asse , as both the bond and equit							
	alue	5.5	% 6.	0%	5.5%				ny's G					mark	ets sl	umpe	d.				-	
al- dar		RTERLY RE Jun. 30			Full Year				ady ro r rates										coulo 2025			
19	101.7	124.7	134.5	113.0	473.9	fice			Advoc										iary,			
)20 )21	109.1 121.3 133.6 124.2 488.2 Public Utility Commission (CPUC) has yet States provides water and 117.1 128.4 136.8 116.6 498.9 to approve the deal. Typically, the CPUC ment services to U.S. militar																					
2022 108.6 122.6 143.8 135 510 goes along with the Public Advoca									ate's	the armed forces continue to privatize												
al-	-	130 Arnings F	145 PER SHARE		Full				n. (Inde utilitie										lieve t nount			
dar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	Also,	with	the	rate in	ncrea	se no	t in e	effect	year	contr	acts t	that a	are be	ing pu	it ou	t f	
19 20	.35 .38	.72 .69	.76 .72	.45 .54	2.28 2.33				er inco portant										busine ere ca			
21	.52	.72	.76	.55	2.55	that	once	the a	igreem	ent_i	s fina	lized,	the	those	in its	s othe	r oper	ation	s.	_		
22 23	.38 <i>.50</i>	.54 <b>.75</b>	.65 .75	.88 .60	2.45 2.60				able to				unds						l muc n. In			
al-		RTERLY DI			Full	We	<b>Te have lowered our earnings es-</b> term, the e									equit	<b>cent quotation.</b> In the near equity is ranked to underpe					
dar 18	255		Sep.30		1 06				<b>th 202</b> nakes	-			-						averag over t			
18 19	.255 .275	.255 .275	.275 .305	.275 .305	1.06 1.16				nakes , we ha					to fiv	e-yea	r pull,	, AWR	l's tota	al retu	rn po	oter	
20 21	.305 .335	.305 .335	.335 .365	.335 .365	1.28 1.40	shar	e-net	estim	ate by	a dir	ne for	• this	year	tial i	s wel				the V			
)22	.365	.365	.305	.000	1.40				main s has					medi Jame	an. es A. I	Flood			Octob	oer 7.	20.	
Prim	ı nary ear	nings. Ex	cludes n	onrecurri		i. e, Septerr	ber, and	Decemb	er.  Div'd	I rein-	(D) Inclu	des intar	igibles. A	s of 12/3		.1 <b>Co</b>			al Strengt			
ns/(lo	sses):; '	06, 3¢; '0 arnings re	)8, (14¢);	'10, (23)	t);   vest	ment plar In millions			t.		million/\$0					Sto	ck's Pric ce Growi	ce Stabil	ity		100 85	
				arly Marc			,,				ble and is						nings Pr				95	

(B) Dividends historically paid in early March, © 2022 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

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AMI	ERI	<u>Can</u>	WAT	ER⊾	NYSE-	WK	P	ECENT 1 RICE	37.33	B P/E Ratio	o <b>31</b> .	<b>O</b> (Traili Medi	ng: 19.2) an: 25.0)	RELATIV P/E RATI	5 <b>2.1</b>	5 DIV'D YLD	2.0	)%	/ALUI		
FIMELIN		2 Raised		High: Low:	32.8 25.2	39.4 31.3	45.1 37.0	56.2 41.1	61.2 48.4	85.2 58.9	92.4 70.0	98.2 76.0	129.9 88.0	172.6 92.0	189.6 131.0	189.3 129.5				t Price 2026	
AFETY		3 New 7/2		LEGEN	700 x "Ca	sh Flow" p	sh							_					2025	2020	32
ECHNI		3 Raised	10/7/22	Options:	elative Pric Yes	e Strength															102
	,	= Market)	Dongo	Shaded	area indic	ates recess	ion								ايىلىن						
o-won		get Price dpoint (%	•											11111 <sup>11111</sup>	цг	''''; <b>¦</b> ''∙-					- 12
132-\$2		94 (40%)										1 <sub>11</sub> 111	1 <sup>0100</sup>	1.		;					
		ROJECTI	ONS							ր <sup>եր</sup> ուս					;						60
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igh 1		(+35%) (-10%)	10% Nil		يوريني. موريني					••••••••	· • • • • • • • • • •				••••	•••••					
-		Decisio		40004. <sup>00</sup>		•••••	••••••••••		•••••	$\square$								% TO	T. RETUR	N 8/22	
Buy	40202 526			Percen		$ \frown$	$\overline{}$							1	1			1 yr.	sтоск -17.2	INDEX -12.0	[ =18
o Sell	369 156569	9 473	415	shares traded	14 - 7 -		httltulu	աստ							111111111			3 yr. 5 yr.	21.7 99.2	43.2 54.9	F
	2007 <sup>E</sup>			2010	2011	2012	2013	2014		2016	2017	2018	2019	2020	2021	2022	2023		UE LINE P		25-2
13.08	13.84		13.98	15.49	15.18	16.25	16.28	16.78	17.72	18.54	18.81	19.04	19.97	20.83	21.58	20.90	22.25		es per sh		27.
.65 d.97	d.47 d2.14			3.56 1.53	3.73 1.72	4.27 2.11	4.36 2.06	4.75 2.39	5.13 2.64	5.26 2.62	5.14 2.38	6.15 3.15	6.65 3.43	7.24	10.46 6.95	8.15 4.45	8.90 4.85	1	low" per s		10. 5.
u.97	u2.14			.86	.90	1.21	2.00	1.21	1.33	2.02	2.30	1.78	1.96	2.15	2.36	2.57	2.80		s per sir · ecl'd per s		3.
4.31	4.74		4.50	4.38	5.27	5.25	5.50	5.33	6.51	7.36	8.04	8.78	9.15	10.05	9.71	13.75	11.75		ending p		11.
23.86 60.00	28.39			23.59 175.00	24.11 175.66	25.11 176.99	26.52 178.25	27.39 179.46	28.25 178.28	29.24 178.10	30.13 178.44	32.42 180.68	33.83 180.81	35.58 181.30	40.18 181.61	41.00 182.00	43.85 182.50		lue per sl n Shs Out		57. 190.
	100.00	40.0		14.6	16.8	170.99	170.25	20.0	20.5	27.7	33.8	27.3	32.9	35.3	23.6	Bold figu			n'i P/E Rat		130
	-			.93	1.05	1.06	1.12	1.05	1.03	1.45	1.70	1.47	1.75	1.81	1.28	Value	Line	-	P/E Ratio		1
	-	- 1.9%		3.8%	3.1%	3.4%	2.0%	2.5%	2.5%	2.0%	2.0%	2.1%	1.7%	1.6%	1.4%			-	n'l Div'd Y	ield	2.3
			as of 6/30 Due in 5 \		9 mil	2876.9 374.3	2901.9 369.3	3011.3 429.8	3159.0 476.0	3302.0 468.0	3357.0 426.0	3440.0 567.0	3610.0 621.0	3777.0 709.0	3920.0 1263.0	3800 810	4060 885		es (\$mill)		51 10
	\$1102	3 mil.	LT Interes	st \$414 m		40.7%	39.1%	39.4%	39.1%	39.2%	420.0 53.3%	28.2%	25.5%	23.3%	23.0%	21.0%	22.0%	-	Tax Rate		24.0
			(59% of C	ap'i)		6.2%	5.1%							5.1%	2.9%	5.0%	5.0%	-	% to Net F		5.0
			Annual rei		.0 mill.	53.9%	52.4%	52.4%	53.7%	52.4%	54.7%	56.3%	58.5%	59.1%	58.6%	60.0%	61.0%		rm Debt F		60.0
ension	1 Assei		2294.0 mi Oblig. \$19		l.	46.1% 9635.5	47.6% 9940.7	47.4%	46.2% 10911	47.5% 10967	45.3% 11875	43.6%	41.4%	40.9%	41.4% 17639	40.0%	20500		n Equity F pital (\$mi		40.0
fd Sto	<b>ck</b> \$3.0	mill.	Pfd Div'd	\$.2 mill		11739	12391	12900	13933	14992	16246	17409	18232	19710	21084	22900	24400	Net Plan		.,	260
		<b>k</b> 181,786	6,473 shar	res		5.4%	5.1%	5.5%	5.7% 9.4%	5.6%	4.9%	5.4%	5.4%	5.7%	8.2% 17.3%	5.5%	5.5%		on Total C		6.0
s of 7/2	21/22					8.4% 8.4%	7.8% 7.8%	8.7% 8.7%	9.4% 9.4%	9.0% 9.0%	7.9% 7.9%	9.7% 9.7%	10.1%	11.0%	17.3%	10.5% 10.5%	10.5% 10.5%	1	on Shr. Eq on Com Ec		10.5
			llion (Larg	• • •		3.6%	4.7%	4.3%	4.7%	4.0%	2.5%	4.2%	4.4%	5.0%	11.4%	4.5%	4.5%	-	to Com		4.0
URRE (\$MIL	NT PO: _L.)	SITION	2020	2021	6/30/22	57%	40%	50%	50%	56%	68%	56%	57%	55%	34%	58%			ls to Net F		62
ash A		ble	576 321	136 271	97 383				Vater Wor nd wastew							regulated					
Other		_	1009	1147	<u>538</u> 1018				y 14 millio							kRock, 8					
	Asset:		1906 189	235	196				municipaliti p as well.							(4/22 Pro ge MacKe					
Debt Du Dther			1611 1081	641 1265	598 934				p as well. Pennsylval							856-346-8					
Current	Liab.	_	2881	2141	1728	Prof	fits fi	rom .	Ameri	can	Wate	r Wo	rks'	if the	e costs	are j	ustifie	ed.			
	L RATE e (per sh			st Est'd	l '19-'21 '25-'27				ght to							tructi					
levenu	ies	3.	5% 3.		4.5% 3.5%				t <b>his y</b> one-t							ent ha uildin					
Cash F arning	IS	9.0 12.0	0% 13.	5% 3	3.0%	final	perio	od, th	e comp	any's	shar	e net	was	repla	cing a	antiqu	ated	pipeli	nes ai	nd wa	aste
ivideň look Va	ds alue	9. 4.	5% 10. 5% 5.	0% 0%	8.5% 8.0%				third a							ems. I end \$2					
Cal-	QUA	RTERLY R	EVENUES (	\$ mill.)	Full				me_am in the :							and ot					
ndar			) Sep. 30		Year	The	bott	om li	ne ou	ght t	o get	bacl	k on	shap	e, the	spend	ling sl	hould	be on	going	g.
2019 2020	813 844	882 931	1013 1079	902 923	3610 3777				23. As m reg							ons o rowtł					
2021	888	999	1082	951	3920				net co							icipall					
2022	842 <b>895</b>	937 <b>1000</b>	1081 1165	940 1000	3800 4060				y perc							ood p					
Cal-			PER SHAR		Full				me fro more b			ty's a	equi-			o fund needed					
ndar	Mar.31	I Jun. 30	) Sep. 30	Dec. 31	Year	The	regu	lator	y clim	ate	could			EPA	guide	lines.	Amer	ican V	Water	has l	beei
2019 2020	.62 .68	.94 .97	1.33 1.46	.54 .80	3.43 3.91			Wate with	r has o							many					
2021	.73	1.14	1.53	3.55	6.95	tions deter			the ates it		thorit owed		that arge			nis ha on wh					
2022	.87 <b>.85</b>	1.20	1.55 1.80	.83 .95	4.45	custo	omers	. Stat	e regul	ators	have	been	cog-	there	are	redu	ndanc	ies i	n the	indu	ustr
2023 Cal-		1.25 RTFRI Y DI	1.80 VIDENDS P		4.85 Full				ge capi							e elim					
cal- endar	Mar.31		Sep.30		Year				ograde potenti						nases, nargir	whic ns.	n sno	uiu 1	nereas	e op	eral
2018	.415	.45	5 .455	5 .455	1.78	infla	tion.	When	prices	were	e risir	ng jus	t 2%	Thes	se tin	nely s					
2019	.455	.50 .55			1.96				s easier							erm a					
						er r	ates		sidents				11 1S	equit	y 18	alrea	auy i	ıradır	ıg W1	uun	ou
2020 2021	.50 .55	.60		25 .6025	2.36	high	, tho	igh i	it mak	es it	mor	e diff	ïcult	proie	cted 🤈	2025-2	027 T	arget	Price	Rano	re.
2020		.60			2.36				it mak prove l						cted 2 es A. 1		027 T	arget	Price Octob		

(A) Diluted earnings. Excludes nonrecur. \$2.70 sh. gain from sale of HOS sub.in Q4, 21.
 (C) In millions. (D) Includes intangibles. On the problem of the problem

<i>Ju</i>	October	7, 2022
Company's Financ	ial Strength	B++
Stock's Price Stab	lity	80
Price Growth Persi	stence	100
Earnings Predictat	oility	80
Ta aukaarika aa		

Schedule DWD-3 Page 4 of 7

		)RNI	<u>a w</u>	AIEF			PF		55.60		<b>31.</b>			RELATIVE P/E RATIO	0 <b>Z.</b> I	7 DIV'D YLD	1.8		ALUE		
IMELIN		4 Lowered		High: Low:	19.4 16.7		23.4 18.4	26.4 20.3	26.0 19.5	36.8 22.5	46.2 32.4	49.1 35.3	57.5 44.6	57.4 39.7	72.1 51.0	72.0 48.5				Price	
		3 Lowered 3 Raised 9		LEGEN 50	NDS	dends p sh nterest Rate															12
	ICAL 1		16/22	2-for-1 sp	elative Pric	ce Strength															
		get Price	Range	Options: '	Yes	ates recess	ion						սկերըը։		յ, լերել, լերել ԱՄՈՆՈՆ	<u> </u>    <sub> </sub>  '.●-					$+6^{4}$
ow-Hig		dpoint (%	•								,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	կ <sub>կնուս</sub> ի									
47-\$89	\$68	8 (20%)								 											-32 24
202	5-27 PF	ROJECTIC	DNS nn'l Total	աղությ	יווןיייהי	<u>ստուս</u>	·***	uuluut .													-20 -10
	Price	Gain	Return										·····,	••							I12
igh ow		(+35%) (-10%)	9% Nil	•••••••••••	•••••	•••••••••				• • • • • • • • • • • • •	••••••	••	•	•••••	••••••	•••••		% TO	T. RETUR	N 8/22	_8
nstitu	tional   402021	102022	ns 202022					*****	*******											L ARITH.*	<b>–</b>
o Buy o Sell	155	152	121	Percent shares	12 -				Ludu	H.LH			. httm		La cu	alti		1 yr. 3 yr.	-6.3 8.6	-12.0 43.2	F
lld's(000)	42143	43279	43653	traded	6 -			الإسلال										5 yr.	69.3	54.9	F.
006	2007		2009	2010	2011		2013	2014			2017	2018	2019	2020	2021	2022	2023		JE LINE PL	UB. LLC	
8.10 1.36	8.88 1.56		10.82	11.05 1.93	12.00 2.07	13.34 2.32	12.23 2.21	12.50 2.47	12.29 2.22	12.70 2.34	13.89 3.00	14.53 3.11	14.72 3.14	15.78 3.88	14.72 3.91	15.45 3.20	16.55 3.70	Revenue "Cash F	es per sn low" per s	sh	17 4
.67	.75		.98	.91	.86	1.02	1.02	1.19	.94	1.01	1.40	1.36	1.31	1.97	1.96	1.70	2.15		s per sh 4		2
.58	.58 1.84		.59 2.66	.60 2.97	.62 2.83	.63 3.04	.64 2.58	.65 2.76	.67 3.69	.69	.72 5.40	.75 5.65	.79 5.64	.85 5.93	.92 5.46	1.00 5.85	1.08		cl'd per s		1
2.14 9.07	9.25		10.13	10.45	2.63	3.04 11.28	2.56	13.11	3.69	4.77 13.75	5.40 14.44	5.65 15.19	5.04 16.07	18.30	5.46 21.92	22.35	6.00 23.55		ending pe lue per sh		25
41.31	41.33	41.45	41.53	41.67	41.82	41.98	47.74	47.81	47.88	47.97	48.01	48.07	48.53	50.33	53.72	53.75	52.00	Commor	n Shs Out	st'g D	50
29.2	26.1	19.8	19.7	20.3	21.3	17.9	20.1	19.7	24.8 1.25	29.6	26.9	30.3	39.3	24.9	30.5	Bold figu Value			'I P/E Rati		2
1.58 2.9%	1.39 3.0%		1.31 3.1%	1.29 3.2%	1.34 3.4%	1.14 3.5%	1.13 3.1%	1.04 2.8%	2.9%	1.55 2.3%	1.35 1.9%	1.64 1.8%	2.09 1.5%	1.28 1.7%	1.67 1.5%	estim			P/E Ratio 'I Div'd Yi		1 2.0
		JCTURE a				560.0	584.1	597.5	588.4	609.4	666.9	698.2	714.6	794.3	790.9	830	860		es (\$mill) E		
		30.0 mill. <b>D</b> 2 mill. L			-	42.6	47.3	56.7	45.0	48.7	67.2	65.6	63.1	96.8	101.1	92.0	112	Net Prof	it (\$mill)		1
		overage: 4		(47% of C		37.5% 8.0%	30.3% 4.3%	33.0% 2.7%	36.0% 4.3%	35.5% 6.1%	30.1% 3.5%	24.5% 3.1%	19.1% 5.8%	11.1% 3.3%	20.1% 1.7%	21.0% 4.0%	21.0% 5.0%		Fax Rate % to Net P	)rofit	21.0
ensio	n Asset	s-12/21 \$8	R10 5 mill	1		47.8%	4.3%	40.1%	4.3%	44.6%	3.5% 42.7%	49.3%	50.2%	45.9%	47.3%	44.0%	42.5%		m Debt R		5. 39.
		C	<b>Oblig.</b> \$88			52.2%	58.4%	59.9%	55.6%	55.4%	57.3%	50.7%	49.8%	54.1%	52.7%	56.0%	57.5%	Commor	n Equity R	latio	60.
td Sto	<b>ck</b> None	e				908.2	1024.9	1045.9	1	1191.2	1209.3	1440.2	1566.7	1702.4	2233.4	2150	2125		pital (\$mil	II)	2
ommo	on Stock	<b>k</b> 54,356,0	000 shs.			1457.1 6.3%	1515.8 6.0%	1590.4 6.3%	1701.8 5.2%	1859.3 5.5%	2048.0 7.1%	2232.7 5.9%	2406.4 5.5%	2650.6	2846.9 5.5%	2950 5.0%	6.0%	Net Plan Return o	n Total Ca	ap'l	30 6.5
						9.0%	7.9%	9.1%	7.0%	7.4%	9.7%	9.0%	8.1%	10.5%	8.6%	7.5%	9.0%		n Shr. Eq		10.
		\$3.0 billio	on (Mid C	Can)		9.0% 3.4%	7.9% 3.4%	9.1% 4.1%	7.0%	7.4% 2.4%	9.7% 4.7%	9.0% 4.0%	8.1% 3.2%	10.5% 6.0%	8.6% 4.6%	7.5% 3.0%	9.0% 4.5%		n Com Ec I to Com E		10.0 5.0
URRE	NT POS		2020	.,	6/30/22	62%	56%	4.1%	2.0% 71%	68%	4.7% 51%	4.0%	5.2 % 60%	43%	4.0%	59%	4.5%		s to Net P	•	5.0 49
(\$MI ash A	LL.) Assets		44.6	78.4	61.7	BUSIN	ESS: Cal	ifornia W	ater Servic	ce Grour	o provide	s regulat	ed and	quired [	Rio Grar	de Corp	; West	I Hawaii U	Jtilities (9	9/08). R	even
ther) ther	t Assets			222.1 300.5	215.0				vice to 49 California.										s, 19%; dir. own		
	Payable	1	31.7	144.4 40.2	139.7	1			s in Washi										Pres. an		
Other			375.1 81.9	72.0	75.8				r Francisco quin Valle										First St.		
	í Liab.	5	588.7	256.6	286.1				ter S			-							and		
urrent								, nu	JUCI D			uup	mas	tome	r wau	CI (0)				un u	pur
NNUA				st Est'd					oves si					in ge	eneral	and	adm	inistr	ative	expe	nse
NNUA change	e (per sh) Jes	<b>S Past</b> 10 Yrs. 3.0	. 5Yr % 4.	rs. to' .0% 3	' <b>25-'27</b> 3.0%	revie	ew. F	First,	the co	ompai	ny's (	Califo	rnia-	That	said	, bot	adm tom-li	inistr ne co	ative ompar	isons	a
NNUA change levent Cash	e (per sh) Jes Flow''	<b>10 Yrs.</b> 3.0 6.5	. <b>5 Yr</b> % 4.0 % 9.0	rs. to' .0% 3	' <b>25-'27</b> 3.0% 2.0%	and	ew. F Wash	First, 1ingto	the con-base	ompa d su	ny's Ibsidia	Califo aries	rnia- both	That poise	said d to	, bot impro	adm tom-li ove ov	inistr ne co ver th	ative ompar ie bac	isons :k ha	a alf
NNUA change levenu Cash l arning ividen	e (per sh) ues Flow'' gs nds	10 Yrs. 3.0 6.5 6.5 3.5	. 5 Yr % 4.0 % 9.0 % 11.0 % 5.0	rs. to' .0% 3	' <b>25-'27</b> 3.0% 2.0%	and inkee sets	ew. F Wash d deal of two	First, ningto l's to o adja	the con- n-base acquin acent u	ompar d su re wa utilitie	ny's ( lbsidia ater s es. Tł	Califo aries systen ne acc	rnia- both 1 as- juisi-	That poise 2022, tome	said d to , larg r rat	, bot impro ely ov e inc	adm tom-li ove ov wing reases	inistr ne co ver th to pro s. Evo	ative ompar le bac ospects en so	isons ck ha s for , we	a alf cu a
NNUA change levent Cash iarning lividen look V	e (per sh) Jes Flow'' gs ids 'alue	10 Yrs. 3.0 6.5 6.5 3.5 6.0	. 5 Yr % 4.1 % 9.0 % 11.1 % 5.1 % 7.1	rs. to' .0% 2 .0% 2 .0% 6 .0% 6	' <b>25-'27</b> 3.0% 2.0% 6.5% 6.5% 5.0%	revie and inkee sets tions	ew. F Wash d deal of two s, whi	First, ningto l's to o adja ch ar	the con- n-base acquinacent u re still	ompar d su re wa utilitie pene	ny's ( lbsidia ater s es. Tł ding	Califo aries systen ne acc custo	rnia- both 1 as- juisi- mary	That poise 2022, tome shavi	said d to , larg r rat ng \$0	, bot impro ely ov e inc: ).30 fr	adm tom-li ove ov wing reases om o	inistr ne co zer th to pro s. Evo ur cu	ative ompar le bac ospects en so rrent-y	isons ck ha s for , we	a alf cu a
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NNUA change levenu Cash l arning ividen ook V Cal- ndar 2019	e (per sh) Jes Flow" gs ids 'alue QUAR Mar.31 126.1	10 Yrs. 3.0 6.5 6.5 3.5 6.0 RTERLY REV Jun.30 179.0	5 Yr % 4.1 % 9.0 % 11.1 % 5.1 % 7.1 VENUES (\$ Sep.30 232.6	rs. to <sup>*</sup> .0% 2 .0% 2 .0% 6 .0% 6	25-27 3.0% 2.0% 6.5% 6.5% 5.0% Full Year 714.6	revie and inked sets tions closin ough resid	ew. F Wash d deal of two s, whi ng con t to lential	First, ningto l's to o adja ch ar nditior bol l ope	the con- n-base acquinacent us re still ns and lster rating	ompar d su re wa utilitie pene regul Calif foot	ny's ( lbsidia ater s es. Th ding latory fornia print	Califo aries system ne acc custo appr Wa in 1	rnia- both n as- quisi- mary oval, ater's these	That poise 2022, tomer shavi ings of Sign is or	said d to , larg r rat ing \$0 estima <b>ificar</b> <b>h the</b>	, bot impro ely ov e inc: 0.30 fr ate, to nt inf dock	adm tom-li ove ov ving reases com o \$1.70 frastr cet ov	inistr ne co ver th to pro s. Evo ur cui ) per s <b>ructui</b> v <b>er th</b>	ative ompar ne bac ospects en so crent-y share. re in ne pu	isons ck ha s for , we year o <b>vestr ll to</b>	alf cu ear <b>ne</b> r <b>la</b>
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34.7	32.0	24.9	23.1	21.1	21.3	21.9	21.2	20.8	23.5	23.9	24.7	32.6	39.1	39.6	28.3		ures are		i'l P/E Rat	-	200
1.87	1.70	1.50	1.54	1.34	1.34	1.39	1.19	1.09	1.18	1.25	1.24	1.76	2.08	2.03	1.55		Line	-	P/E Ratio		1
.8%	2.1%	2.8%	3.1%	3.1%	2.8%	2.8%	2.4%	2.5%	2.6%	2.3%	2.4%	2.4%	2.2%	2.2%	2.2%	estin	nates	Avg Anr	n'l Div'd Y	ield	2.
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				of Cap'l)		39.0%	10.0% 1.1%	10.5% 2.4%	6.9% 3.1%	8.2% 3.8%	6.6% 6.3%	6.8%	7.2%	4.5%	4.8%	4.0% 5.0%	10.0% 5.0%		% to Net F	Profit	15. 6.
nsion	Assets	s-12/21 \$	433.1 mill			52.7%	48.9%	48.5%	50.3%	48.4%	50.6%	54.4%	43.1%	54.0%	52.7%	54.0%	54.5%		rm Debt F		53.
				blig. \$452	2.9 mill.	47.3%	51.1%	51.5%	49.7%	51.6%	49.4%	45.6%	56.9%	46.0%	47.3%	46.0%			n Equity F		47
	k None		.763 shar	00		2929.7	3003.6	3216.0	3469.5	3587.7	3965.4	4407.8	6824.2	10192	10964	11975	12800	1	pital (\$mi	II)	16
of 7/22		202,170	,703 Shai	65		3936.2	4167.3	4402.0	4688.9	5001.6	5399.9	5930.3	6345.8	9512.9	10252	10900		Net Plan			13
						6.6% 11.0%	8.0% 13.4%	7.8% 12.9%	6.9% 11.7%	7.6% 12.7%	7.1% 12.2%	5.5% 9.6%	4.2% 5.8%	3.7% 6.1%	4.8% 8.3%	5.5% 8.5%	5.5% 8.5%		on Total Ca on Shr. Eq		5. 8.
ARKET	CAP:	\$11.4 bil	lion (Larg	ge Cap)		11.0%	13.4%	12.9%	11.7%	12.7%	12.2%	9.6%	5.8%	6.1%	8.3%	8.5%	8.5%	1	on Com Eq		8.
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(\$MILL sh As			4.8	10.6	13.0	61%	50%	52%	60%	56%	59%	79%	84%	82%	60%	62%	62%	All Div'd	s to Net P	Prof	6
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Excl. gain from disc. operations: '12, 7c; '13, 9e; '14, 11c. Quarterly EPS do not add in '19 (B) Dividends historically paid in early March, '(D) Includes intangibles: 12/31/21, \$1.231 due to a large change in the number of shares '(B) Dividends historically paid in early March, '(D) Includes intangibles: 12/31/21, \$1.231 due to a large change in the number of shares '(B) Dividends historically paid in early March, '(D) Includes intangibles: 12/31/21, \$1.231 due to a large change in the number of shares '(B) Dividends historically paid in early March, '(D) Includes intangibles: 12/31/21, \$1.231 due, 2022 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

Schedule DWD-3 Page 6 of 7

MIC		ESE)	(WA	1			P	ecent Rice	81.7			<b>J</b> (Medi	an: 24.0 <b>/</b>	RELATIVI P/E RATI	0 2.4	7 DIV'D YLD	1.4	%	/ALUI LINE		
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.68	.69		.71	.72	.73	.74	.75	.76	.78	.81	.86	.91	.98	1.04	1.11	1.18	1.25		cl'd per s		1.4
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13.17	13.25		13.52	15.57	15.70	15.82	15.96	16.12	16.23	16.30	16.35	16.40	17.43	17.47	17.52	17.75	17.85	Commo	n Shs Out	st'g <sup>C</sup>	18.
22.7 1.23	21.6		21.0 1.40	17.8 1.13	21.7 1.36	20.8 1.32	19.7 1.11	18.5 .97	19.1 .96	25.6 1.34	28.4 1.43	22.2 1.20	29.7 1.58	30.1 1.55	44.3 2.43	Bold fig Value			n'I P/E Rat		28 1.3
3.7%	3.7%		4.7%	4.2%	4.0%	4.0%	3.7%	3.7%	3.3%	2.3%	2.2%	2.1%	1.6%	1.6%	1.2%	estin	ates		n'l Div'd Y		1.8
						110.4	114.8	117.1	126.0	132.9	130.8	138.1	134.6	141.6	143.1	155		Revenue			1
	t \$305.4	3.2 mill. <b>[</b> 4 mill. <b>[</b>	T Interes			14.4 33.9%	16.6 34.1%	18.4 35.0%	20.0 34.5%	22.7 34.0%	22.8 32.7%	32.5 2.8%	33.9	38.4	36.5 2.8%	44.0 21.0%	45.0 21.0%	Net Prot Income			50 21.0
Fotal ir	nterest c	overage: {	5.0x) (45% of C	ap'l)		3.4%	1.9%	1.7%	1.9%	2.7%	3.1%	1.4%	3.4%	3.9%	3.9%	2.5%	2.5%		% to Net I	Profit	2.5
	n Accet	ts-12/21 \$		• •		41.5% 57.4%	40.4% 58.7%	40.5% 58.8%	39.4% 59.8%	37.9% 61.5%	37.5% 61.8%	37.8% 61.6%	41.5% 58.2%	44.0% 55.7%	45.3% 54.4%	44.0% 55.5%	43.5% 56.0%	-	rm Debt F		42.0 57.5
		(	Oblig. \$1 <sup>-</sup>	13.7 mill.		316.5	321.4	335.8	345.4	355.4	370.7	404.1	556.7	621.5	676.3	690	710		n Equity F pital (\$mi		57.5
fd Sto	ock \$2.4	mill. Pfd I	Div'd: \$.1	mill.		435.2	446.5	465.4	481.9	517.8	557.2	618.5	705.7	796.6	865.4	875	885	Net Plan			9
	on Stoc /29/22	<b>k</b> 17,610,0	000 shs.			5.4% 7.8%	5.9% 8.7%	6.3% 9.2%	6.6% 9.6%	7.1%	6.9% 9.8%	8.9% 12.9%	6.7% 10.4%	6.8% 11.0%	6.0% 9.9%	6.5% 11.0%	6.5% 11.0%		on Total C on Shr. Eq		7.5
5017	LJILL					7.8%	8.7%	9.3%	9.6%	10.3%	9.9%	13.0%	10.4%	11.1%	9.9%	11.5%	11.0%	Return o	on Com E	quity	12.0
IARKE	ET CAP:	: \$1.4 billi	on (Smal	l Cap)		1.4% 83%	2.4% 73%	3.1% 67%	3.5% 63%	4.3% 58%	3.8% 62%	7.0% 46%	5.4% 48%	5.8% 48%	4.6% 53%	6.0% 48%	5.5% 50%		d to Com I Is to Net F		6.0 51
URRE (\$MI		SITION	2020	2021	6/30/22				Vater Cor										r 59% of		-
	ssets		4.5 29.6	3.5 30.9	4.3 34.7	and op	eration o	f regulate	ed water u a. It also	utility syst	tems in N	lew Jers	ey, Del-	nues. A	t 12/31/2	1, the co	mpany h	nad 347 e	employee	s. Incorp	oorate
urren	t Assets		34.1	34.4	39.0	system	s under o	contract (	on behalf	of munic	ipal and	private c	lients in						nnis W. I ackRock		
ebt D	Payable ue	•	30.4 9.3	21.1 6.7	24.2 7.8				k System ily in Mic										outh, Suite v.middles		
other Surren	t Liab.	_	<u>17.1</u> 56.8	28.8	46.8				ter re										ond q		
	L RATE		Pa	st Est'd	'19-'21	to 1	mana	ge t	he B	orou	ğh o	f Ava	alon,	\$0.50	) per s	share.	Expi	ring i	ncome	tax l	bene
leveni		2.0	1%.	5% 2	<b>25-'27</b> 2.5%				wate he ne											expe	
Cash arning	Flow" gs	8.0 9.5	i% 11.	0% 4	3.5% 4.5%	whic	h we	nt in	to eff	ect or	n Sep	otemb	er 1,	are s	havin	g a di	me fr	om ou	ır full	-year	202
ivider ook V		3.5 6.0			5.0% 2.5%				the d inc												
Cal-		RTERLY RE			Full	main	ntenar	ice an	d cust	omer	servio	ces.		ship	is p	poised	d to	inve	st he	éavily	y o
ndar 019	Mar.31 30.7	1 Jun. 30 33.4	Sep. 30 37.8	Dec. 31 32.7	Year 134.6				hike npany										<b>upgra</b> 'y sys		
020	31.8	35.3	39.9	34.6	141.6	ware	e wa	astew	ater	dive	estme	ent i	from	pipel	ines	are l	ong	overd	ue fo	r rep	plac
021 022	32.5 36.2	36.7 39.7	39.9 <b>41.0</b>	34.0 <b>38.1</b>	143.1 155				e <b>ar.</b> T 60.7 m										to focu is as v		
023	38.0	41.0	42.0	39.0	160	enue	s for	the	June	period	l. Ho	wever	, the	all, a	aggres	ssive	spend	ling o	on pu	blic i	infr
Cal- 1dar		ARNINGS F Jun. 30			Full Year	top	line	is be	nefitir custor	ng no	tably	from	the						that the		
019	.39	.49	.66	.46	2.01				ersey					ther	down	the ro	bad.	•			
020 021	.44		.72 .65	.47 .41	2.18 2.07				prove										ked t		
022	.68	.50	.75	.52	2.45				aggr n sys										rages s. Wh		
023	.53	.60 RTERLY DIN	.77 //IDENDS D	.60	2.50	sum,	we	now	look f	for re	venue	es of	\$155	at th	ne rec	ent q	uotat	ion, t	he eq	uity	lack
Cal- ndar		l Jun.30			Full Year				r (up f ) and										and 3- mpan		
018	.2237	75 .22375	5 .22375	.24	.91	next	(up fi	rom \$	158 m	illion)	•			cyclic	eal an	id pay	ysa	stable	quar	terly	div
019 020	.24 .2562	.24 2 .2562	.24 .2562	.2562 .2725	.98 1.04				ı-line 22, de												
2021	.2725	.2725 .	.2725	.2725	1.11	duct	tion	to c	our c	urre	nt-ye	ar p	rofit	the p	ruden	it mov	ve her	e at tl	his jur	icture	e.
2022	.29	.29	.29						ings c				20%	Nich	olas P		s		Octob		
	·																				
	ed earni vember.	ings. Next	earnings	report du	ue <b>(B)</b> Mav	Dividend , Aug., an	s histori nd Noverr	cally pai nber.∎ Div	d in mic /'d reinve	I-Feb.,   stment	( <b>C)</b> In mi	llions.				Sto	ck's Pric	Financia ce Stabili th Persis		th	B++ 85

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SJ	NG	ROU	PNYS	E-sjw			R	ecent Rice	59.57	7 P/E RATI	o <b>28</b> .	9 (Traili Medi	ng: 34.2) an: 23.0)	RELATIVE P/E RATIO		1 DIV'D YLD	2.4	V/.	ALUI .ine		
TIMELI	NESS	4 Lowere	d 8/12/22	High: Low:	26.8 20.9	26.9 22.6	30.1 24.5	33.7 25.5	35.7 27.5	56.9 28.6	69.3 45.4	68.4 51.3	74.5 53.9	75.0 45.6	73.7 58.0	73.4 55.7				Price	
SAFET		3 New 4/2		LEGE	NDS	dends p sh			_										2025	2020	
<b>LECHN</b>		3 Raised	10/7/22	div Re	vided by In elative Pric	terest Rate															
	`	0 = Market)		Options: '	Yes	ates recess	ion														120 100
		rget Pric	•				<u> </u>						ىلى.	հետուս	եսորի	<u>ын</u>					
L <b>ow-H</b> i \$57-\$9	-	idpoint (%	o to Mid)								יייי <sup>ווי</sup>	וייוייין,וי	runn.		<u> </u>	<u></u> ++					60 
		77 (30%) PROJECT																			+40
20		1	Ann'l Total	ل ال <mark>السا</mark> ل	L	աստեսել	աղոր	իրուդ	411 <sub>111111</sub> 111												30
ligh	Price 90	Gain (+50%)	Return 13%	*******	•••••					•• •••	••••	•••••••	·····	•••••							-20
_0W	60 Itional	(Nil) Decisio	3%		··		******	•••••••••	*****			1			• ••••	•••••			RETUR		_ 15
	4Q202	21 1Q202	2 2Q2022	Percen	t 15 <b>-</b>													S	тоск	INDEX	L
to Buy to Sell	9 6	8 80	0 104	shares traded	10 - 5 -		-11	. 1		11.1.111						ulull.r		3 yr.	-5.2 -0.4	-12.0 43.2	F
Hld's(000 2006	2189 2007			2010	2011	2012	ulluulu 2013	2014		 2016	2017	2018	2019	2020	2021	2022	2023		27.2 <b>T INF D</b> I	54.9 UB. LLC	25-27
10.35	11.2			11.62	12.85	14.01	13.73	15.76	14.97	16.61	18.97	14.00	14.78	19.77	19.01	20.00	2025	Revenues		OD. LLC	22.1
2.38	2.3			2.38	2.80	2.97	2.90	4.42	3.86	4.76	5.24	3.29	3.13	5.28	5.13	3.60	4.15	"Cash Flo		sh	4.90
1.19	1.0			.84	1.11	1.18	1.12	2.54	1.85	2.57	2.86	1.82	.82	2.14	2.03	1.95	2.50	Earnings			3.2
.57 3.87	.6 6.6			.68 5.65	.69 3.75	.71 5.67	.73 4.68	.75	.78 5.24	.81 6.95	1.04	1.12 5.08	1.20 6.25	1.28	1.36	1.44 7.50	1.52 8.00	Div'd Dec Cap'l Spe			1.7 7.7
12.48	12.9			13.75	14.20	14.71	15.92	17.75	18.83	20.61	22.57	31.31	31.27	32.12	34.28	36.65	39.15	Book Valu			40.8
18.28	18.3	6 18.18	3 18.50	18.55	18.59	18.67	20.17	20.29	20.38	20.46	20.52	28.40	28.46	28.56	30.18	30.00	30.00	Common	Shs Out	st'g <sup>C</sup>	30.0
23.5	33.			29.1	21.2	20.4	24.3	11.2	16.6	15.7	18.8	32.7	NMF	30.0	32.9	Bold fig Value	ures are Line	Avg Ann'l			23.
1.27 2.0%	1.7			1.85 2.8%	1.33 2.9%	1.30 3.0%	1.37 2.7%	.59 2.6%	.84 2.5%	.82 2.0%	.95 1.9%	1.77 1.9%	NMF 1.9%	1.54 2.0%	1.80 2.0%	estin		Relative P Avg Ann'l			1.3 2.3%
			as of 6/30		2.070	261.5	276.9	319.7	305.1	339.7	389.2	397.7	420.5	564.5	573.7	600	625	Revenues		iciu	66
Fotal D	ebt \$14	494.7 mill.	Due in 5	Yrs \$39.0		22.3	23.5	51.8	37.9	52.8	59.2	38.8	23.4	61.5	60.5	59.0		Net Profit			98.
		5.7 mill. overage: 3	LT Interes	st \$50.0 n	nill.	41.1%	38.7%	32.5%	38.1%	38.8%	36.7%	20.6%	26.4%	12.0%	12.2%	21.5%	21.0%	Income Ta			21.09
		volugo. o		(59% 0	f Cap'l)									2.0%	1.5%	1.5%	1.5%	AFUDC %			1.5%
						55.0% 45.0%	51.1% 48.9%	51.6% 48.4%	49.8% 50.2%	50.7% 49.3%	48.2% 51.8%	32.7% 67.3%	59.1% 40.9%	58.4% 41.6%	59.1% 40.9%	57.5% 42.5%	54.0% 46.0%	Long-Tern Common			45.0% 55.0%
						610.2	656.2	744.5	764.6	855.0	894.3	1320.7	2173.6	2204.7	2527.5	2575	2550	Total Capi			222
ensic	n Asse	ets-12/21	\$310.2 mill Oblig. \$3			831.6	898.7	963.0		1146.4	1239.3	1328.8	2206.5	2334.9	2497.5	2565	2650	Net Plant			282
	ock Nor		•	00.0 1111.		5.0%	5.0%	8.3%	6.3%	7.4%	7.9%	3.9%	1.8%	4.0%	3.5%	3.0%	3.5%	Return on			5.0%
Comm	on Stoo	<b>ck</b> 30,248	,000 shs.			8.1% 8.1%	7.3% 7.3%	14.4% 14.4%	9.9% 9.9%	12.5% 12.5%	12.8% 12.8%	4.4% 4.4%	2.6% 2.6%	6.7% 6.7%	5.8% 5.8%	5.5% 5.5%	6.5% 6.5%	Return on Return on		-	8.0% 8.0%
MARK	ET CAP	P: \$1.8 bil	lion (Smal	ll Cap)		3.3%	2.8%	10.2%	5.7%	8.6%	8.2%	1.8%	NMF	2.7%	2.0%	1.5%	2.5%	Retained t			3.5%
	ENT PO ILL.)	SITION	2020	2021	6/30/22	59%	62%	29%	42%	31%	36%	60%	NMF	59%	66%	74%	61%	All Div'ds	to Net P	Prof	54%
Cash /	Assets Receiva	ahla	9.3 58.1	10.9 53.7	12.0 58.8				p engage ribution, ar									hich provi			
Other		_	59.9	69.5	68.0				imately 2									tors own a			
	it Asset Payable		127.3 34.2	134.1 30.4	138.8 26.6				e million p									an & CEO			
Debt E Other	Jué		76.2 240.4	39.1 133.8	39.0 212.2				reach abo ind Austin									10 West Ta 7800. Interi			
	it Liab.	-		203.3	277.8	SJW							-	necti	ut, i	Maine	e, an	d Tex	as v	vere	als
	AL RAT				1 '19-'21	anti	cipat	ed	second	d-qua	arter	bot	tom-	recen	tly ap	oprove	ed by	regula	tors.	More	eovei
Reven	ge (per s ues	4.	0% 2.	5% io	' <b>25-'27</b> 3.5% 2.5%													thier e increas			
Cash Earnin	Flow" as		0%. 0%-6.	5% 2 5% 14	2.5% 4.0%													e, we			
Divide Book \	nds	6.	0% -6. 5% 10. 0% 11.	5% 5%	4.0% 5.5% 4.0%													very in			
Cal-			EVENUES (		Full													on cur owering			
endar			0 Sep. 30						he per							565 a	inu n	Jwering	s ue		unga
2019	77.7		114.0	125.8	420.5	basis	s), hi	igher	admi	nistra	ative	expe	nses,	Aggr	essiv	e inf	frastr	uctur	e_in	vesti	men
2020 2021	115.8		165.9 166.9	135.6 139.8	564.5													er the r, top			
2022	124.3	149.0	175	151.7	600	ingau												s \$223			
2023	130			155	625	beat	outlo	ok foi	the re	emair	nder o	f the	year,	inves	tment	ťbud	get.	Funds	are	allo	cate
Cal- ndar			PER SHAR 0 Sep. 30		Full Year													regions cement			
2019	.21		.33	d.19	.82				the									ades,			
2020	.08	.69	.91	.46	2.14	conse	ecutiv	e yea	r of sha	are pi	rofit d	ecline	s.	comp	any's	adva	inced	meter	ring	initia	ative
2021 2022	.09		.64 <b>.75</b>	.60 <b>.70</b>	2.03 1.95													V Gro			
2023	.23		.95	.75	2.50				evenue y fur									\$1.3 b	mon	on 1	mra
Cal-			VIDENDS P		Full	hikes	s and	a wio	ler bas	e. Re	egardi	ng the	e for-	Inve	stors	shou	uld t	urn t			
endar	Mar.3		) Sep.30		Year													nfavora			
	.28	.28 .30	.28 .30	.28 .30	1.12													d pric ecent o			
	1 .00	.30	.30	.32	1.20				n would												
2019 2020	.32																				
2018 2019 2020 2021 2022	.34	.34	.34	.34	1.36	to n	ot on	ly bo	ost rat	es, b	out re	coup	reve-	leave		eh to k	be des	ired.			0.05
2019 2020 2021 2022	.34 .36	.34 .36	.34 .36	.34	1.36	to n nues	ot on retro	ly boo pactiv		es, b te in	out re icrease	coup es in	reve-	leave		ch to t atriki	be des	ired. C	Octobe	er 7, 1	
2019 2020 2021 2022	.34 .36 Ited ea	.34 .36 .rnings. E	.34	.34	1.36	to no nues add due t	ot on retro	ly boo bactiv	ost rat	es, b te in	out re acrease (C) In mil	coup es in lions.	reve- Con-	leave Niche	olas P	ch to b atriki	be des s npany's	ired.	Octobe Strengt	er 7, 1	2022 B+ 85

report due early November. Quarterly egs. may vestment plan available. © 2022 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. The FPUBLISHER IS NOT RESPONSIBLE FOR ANY ERFORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use, No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

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arnings Predictability	45
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# <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Summary of Risk Premium Models for the <u>Proxy Group of Six Water Companies</u>

		Proxy Group of Six Water Companies
Predictive Risk Premium Model (PRPM) (1)		12.20 %
Risk Premium Using an Adjusted Total Market Approach (2)		11.48
	Average	11.84 %

Notes:

(1) From page 2 of this Schedule.

(2) From page 3 of this Schedule.

[6] [7]	Risk-Free Indicated Rate (4) ROE (5)	12	3.96% NMF 3.96% 11.93%		3.96% 12.22%	3.96% 12.01%	Average 12.28%	Median 12.12%	Median 12.20%
[2]	Predicted Risk Risk Premium (3) Rati		15.91%	12.33%	8.26%	8.05%	Α	-	Average of Mean and Median
[4]	GARCH Coefficient	1.8762	4.3376 1 9400	2.1737	1.9845	1.5394			
[3]	Recommended Variance (2)	0.38%	0.29%	0.45%	0.33%	0.42%		gful Figure	
[2]	Spot Predicted Variance	0.41%	0.42% 0.51%	0.72%	0.86%	0.44%		NMF=Not Meaningful Figure	
[1]	LT Average Predicted Variance	0.38%	0.29%	0.45%	0.33%	0.42%		N	
	Proxy Group of Six Water Companies	American States Water Company	American Water Works Company, Inc. California Water Service Groun	Essential Utilities Inc.	Middlesex Water Company	SJW Group			

Confluence Rivers (MO) Utility Operating Company, Inc.

Notes:

- The Predictive Risk Premium Model uses historical data to generate a predicted variance and a GARCH coefficient. The historical data used are the equity risk premiums for the first available trading month as reported by Bloomberg Professional Services. (1)
  - Recommended variance based on the long-term average predicted variance.
    - $(1+(Column [3] * Column [4])^{^{12}}) 1.$
  - From note 2 on page 2 of Schedule DWD-5.  $(2, \overline{2}, \overline{2}, \overline{2}, \overline{2})$ 
    - Column [5] + Column [6].

# <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Indicated Common Equity Cost Rate Through Use of a Risk Premium Model <u>Using an Adjusted Total Market Approach</u>

<u>Line No.</u>		Proxy Group of Six Water Companies
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	5.24 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A2 Rated Public Utility Bonds	0.39 (2)
3.	Adjusted Prospective Yield on A2 Rated Public Utility Bonds	5.63 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group (3)	0.11
5.	Adjusted Prospective Bond Yield	5.74 %
6.	Equity Risk Premium (4)	5.74
7.	Risk Premium Derived Common Equity Cost Rate	<u>    11.48  </u> %

Notes: (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 9 and 10 of this Schedule).

- (2) The average yield spread of A2 rated public utility bonds over Aaa rated corporate bonds of 0.39% from page 4 of this Schedule.
- (3) Adjustment to reflect the A3 Moody's LT issuer rating of the Utility Proxy Group as shown on page 5 of this Schedule. The 0.11% upward adjustment is derived by taking 1/3 of the spread between A2 and Baa2 Public Utility Bonds (1/3 \* 0.32% = 0.11%) as derived from page 4 of this Schedule.
- (4) From page 7 of this Schedule.

# <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Interest Rates and Bond Spreads for <u>Moody's Corporate and Public Utility Bonds</u>

# Selected Bond Yields

		A2 Rated	
	Aaa Rated	Public Utility	Baa2 Rated Public
	Corporate Bond	Bond	Utility Bond
Oct-2022	5.10 %	5.88 %	6.18 %
Sep-2022	5.59	5.28	5.61
Aug-2022	4.07	4.76	5.09
Average	4.92 %	5.31 %	5.63 %
	- I - I-		

# Selected Bond Spreads

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:

0.39 % (1)

Baa2 Rated Public Utility Bonds Over A2 Rated Public Utility Bonds:

0.32 % (2)

Notes:

(1) Column [2] - Column [1].
 (2) Column [3] - Column [2].

Source of Information:

**Bloomberg Professional Services** 

#### <u>Confluence Rivers (MO) Utility Operating Company. Inc.</u> Comparison of Long-Term Issuer Ratings for <u>Proxy Group of Six Water Companies</u>

	1	Moody's	Standard & Poor's		
	0	m Issuer Rating ober 2022		rm Issuer Rating ober 2022	
Proxy Group of Six Water Companies	Long- Term Issuer Rating	Numerical Weighting (1)	Long- Term Issuer Rating	Numerical Weighting (1)	
American States Water Company (2) American Water Works Company, Inc. (3) California Water Service Group Essential Utilities Inc. (4) Middlesex Water Company SJW Group (5)	A2 A3 NR Baa1 NR NR	6.0 7.0  8.0 	A+ A A+ A A-	5.0 6.0 5.0 6.0 6.0 7.0	
Average	A3	7.0	A	5.8	

Notes:

- (1) From page 6 of this Schedule.
- (2) Ratings that of Golden State Water Company.
- (3) Ratings that of New Jersey American Water Co., and Pennsylvania American Water Co.
- (4) Ratings that of PNG Companies and Aqua Pennsylvania, Inc. (S&P).
- (5) Ratings are that of San Jose Water Company, Connecticut Water Inc. and Connecticut Water Service Inc.

Source Information:

Moody's Investors Service Standard & Poor's Global Utilities Rating Service

Moody's Bond Rating	Numerical Bond Weighting	Standard & Poor's Bond Rating
Rating	Weighting	Rating
Aaa	1	AAA
Aa1	2	AA+
Aa2	3	AA
Aa3	4	AA-
A1	5	A+
A2	6	А
A3	7	A-
Baa1 Baa2	8 9	BBB+ BBB
Baa3	10	BBB-
Ba1	11	BB+
Ba2	12	BB
Ba3	13	BB-
B1	14	B+
B2	15	В
B3	16	B-

# Numerical Assignment for Moody's and Standard & Poor's Bond Ratings

# <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Judgment of Equity Risk Premium for the <u>Proxy Group of Six Water Companies</u>

Line No.		Proxy Group of Six Water Companies
1.	Calculated equity risk premium based on the total market using the beta approach (1)	6.77 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A2 rated bonds (2)	4.70
3.	Average equity risk premium	5.74_%

- Notes: (1) From page 8 of this Schedule.
  - (2) From page 11 of this Schedule.

#### <u>Confluence Rivers (MO) Utility Operating Company. Inc.</u> Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for the <u>Proxy Group of Six Water Companies</u>

<u>Line No.</u>	Equity Risk Premium Measure	Proxy Group of Six Water Companies
1.	Ibbotson Equity Risk Premium (1)	6.13 %
2.	Regression on Ibbotson Risk Premium Data	7.02 (2)
3.	Ibbotson Equity Risk Premium based on PRPM (3)	9.79
4.	Equity Risk Premium Based on Value Line Summary and Index	11.16 (4)
5.	Equity Risk Premium Based on Value Line S&P 500 Companies	11.17 (5)
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies	6.81 (6)
7.	Conclusion of Equity Risk Premium	8.68 %
8.	Adjusted Beta (7)	0.78
9.	Forecasted Equity Risk Premium	<u> </u>

#### Notes:

(1) Based on the arithmetic mean historical monthly returns on large company common stocks from Kroll 2022 SBBI® Yearbook minus the arithmetic mean monthly yield of Moody's average Aaa and Aa2 corporate bonds from 1928-2021.

- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of large company common stocks relative to Moody's average Aaa and Aa2 rated corporate bond yields from 1928-2021 referenced in Note 1 above. Using the equation generated from the regression, an expected equity risk premium is calculated using the average consensus forecast of Aaa corporate bonds of 5.24% (from page 3 of this Schedule).
- (3) The Predictive Risk Premium Model (PRPM) is discussed in the accompanying direct testimony. The Ibbotson equity risk premium based on the PRPM is derived by applying the PRPM to the monthly risk premiums between Ibbotson large company common stock monthly returns and average Aaa and Aa2 corporate monthly bond yields, from January 1928 through October 2022.
- (4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the average consensus forecast of Aaa corporate bonds of 5.24% (from page 3 of this Schedule) from the projected 3-5 year total annual market return of 16.40% (described fully in note 1 on page 2 of Schedule DWD-5).
- (5) Using data from Value Line for the S&P 500, an expected total return of 16.41% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 5.24% results in an expected equity risk premium of 11.17%.
- (6) Using data from the Bloomberg Professional Service for the S&P 500, an expected total return of 12.05% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 5.24% results in an expected equity risk premium of 6.81%.
- (7) Average of mean and median beta from Schedule DWD-5.

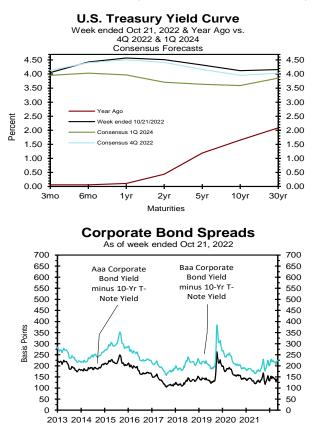
Sources of Information:

Kroll 2022 SBBI® Yearbook Industrial Manual and Mergent Bond Record Monthly Update. Value Line Summary and Index Blue Chip Financial Forecasts, June 1, 2022 and November 1, 2022 Bloomberg Professional Services

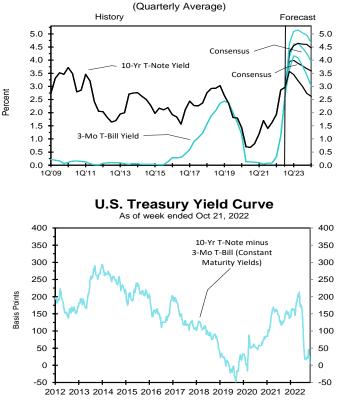
	History					Cons	ensus l	Foreca	sts-Qua	arterly	Avg.			
	Av	erage For	Week End		Ave	erage For	Month	Latest Qtr	4Q	1Q	2Q	3Q	4Q	1Q
Interest Rates	Oct 21	<u>Oct 14</u>	<u>Oct 7</u>	<u>Sep 30</u>	<u>Sep</u>	Aug	<u>Jul</u>	<u>3Q 2022</u>	<u>2022</u>	<u>2023</u>	<u>2023</u>	<u>2023</u>	<u>2023</u>	<u>2024</u>
Federal Funds Rate	3.08	3.08	3.08	3.08	2.56	2.33	1.68	2.19	3.9	4.6	4.7	4.6	4.4	4.1
Prime Rate	6.25	6.25	6.25	6.25	5.73	5.50	4.85	5.36	6.9	7.6	7.7	7.6	7.4	7.1
SOFR	3.04	3.04	3.04	2.98	2.50	2.28	1.60	2.13	3.7	4.5	4.6	4.5	4.3	4.0
Commercial Paper, 1-mo.	3.31	3.16	3.08	3.07	2.80	2.33	1.90	2.34	4.0	4.6	4.6	4.5	4.3	4.0
Treasury bill, 3-mo.	4.05	3.74	3.46	3.37	3.22	2.72	2.30	2.75	4.1	4.6	4.6	4.5	4.3	4.0
Treasury bill, 6-mo.	4.43	4.24	4.02	3.90	3.71	3.15	2.87	3.24	4.4	4.8	4.7	4.5	4.3	4.0
Treasury bill, 1 yr.	4.57	4.38	4.15	4.07	3.89	3.28	3.02	3.40	4.5	4.7	4.7	4.5	4.3	4.0
Treasury note, 2 yr.	4.51	4.38	4.18	4.20	3.86	3.25	3.04	3.38	4.4	4.5	4.4	4.1	3.9	3.7
Treasury note, 5 yr.	4.32	4.18	3.98	4.06	3.70	3.03	2.96	3.23	4.2	4.3	4.1	4.0	3.8	3.6
Treasury note, 10 yr.	4.12	3.95	3.75	3.83	3.52	2.90	2.90	3.11	4.0	4.0	3.9	3.8	3.7	3.6
Treasury note, 30 yr.	4.16	3.95	3.78	3.76	3.56	3.13	3.10	3.26	4.0	4.1	4.1	4.0	3.9	3.9
Corporate Aaa bond	5.56	5.37	5.16	5.19	4.87	4.35	4.39	4.54	5.3	5.5	5.4	5.4	5.3	5.1
Corporate Baa bond	6.38	6.19	5.96	6.00	5.64	5.08	5.15	5.29	6.3	6.5	6.5	6.4	6.3	6.2
State & Local bonds	4.59	4.52	4.53	4.58	4.31	3.84	3.82	3.99	4.6	4.8	4.7	4.6	4.5	4.4
Home mortgage rate	6.94	6.92	6.66	6.70	6.11	5.22	5.41	5.58	6.8	6.9	6.7	6.6	6.4	6.2
				Histor	y				Co	onsensu	ıs Fore	casts-(	)uartei	ly
	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q
Key Assumptions	2020	2021	2021	2021	2021	2022	2022	2022	<u>2022</u>	<u>2023</u>	<u>2023</u>	<u>2023</u>	<u>2023</u>	<u>2024</u>
Fed's AFE \$ Index	105.1	103.4	102.9	105.0	107.0	108.4	113.7	119.0	123.2	123.2	122.0	120.4	119.6	118.9
Real GDP	3.9	6.3	7.0	2.7	7.0	-1.6	-0.6	2.6	0.4	-0.4	-0.1	0.9	1.2	1.5
GDP Price Index	2.5	5.2	6.3	6.2	6.8	8.3	9.0	4.1	4.6	3.8	3.1	2.7	2.7	2.3
Consumer Price Index	2.2	4.1	8.2	6.7	7.9	9.2	10.5	5.7	4.8	4.0	3.0	2.8	2.6	2.4
PCE Price Index	1.6	4.5	6.4	5.6	6.2	7.5	7.3	4.2	4.3	3.6	2.8	2.6	2.4	2.3

**Consensus Forecasts of U.S. Interest Rates and Key Assumptions** 

Forecasts for interest rates and the Federal Reserve's Advanced Foreign Economies Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index, CPI and PCE Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data: Treasury rates from the Federal Reserve Board's H.15; AAA-AA and A-BBB corporate bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity; State and local bond yields from Bank of America-Merrill Lynch, A-rated, yield to maturity; Mortgage rates from Freddie Mac, 30-year, fixed; SOFR from the New York Fed. All interest rate data are sourced from Haver Analytics. Historical data for Fed's Major Currency Index are from FRSR H.10. Historical data for Real GDP, GDP Price Index and PCE Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index history is from the Department of Labor's Bureau of Labor Statistics (BLS)..



## US 3-Mo T-Bills & 10-Yr T-Note Yield



# Long-Range Survey:

The table below contains the results of our twice-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are consensus estimates for the years 2023 through 2028 and averages for the five-year periods 2024-2028 and 2029-2033. Apply these projections cautiously. Few if any economic, demographic and political forces can be evaluated accurately over such long time spans.

				Average Fo	or The Year			Five-Year	Averages
		2023	2024	2025	2026	2027	2028	2024-2028	2029-2033
1. Federal Funds Rate	CONSENSUS	3.0	2.7	2.5	2.5	2.5	2.5	2.6	2.5
	Top 10 Average	3.5	3.3	3.0	2.8	2.8	2.8	3.0	2.8
	Bottom 10 Average	2.6	2.1	2.0	2.2	2.2	2.2	2.2	2.1
2. Prime Rate	CONSENSUS	6.1	5.9	5.7	5.6	5.6	5.6	5.7	5.6
	Top 10 Average	6.6	6.4	6.1	6.0	6.0	6.0	6.1	5.9
	Bottom 10 Average	5.6	5.3	5.2	5.3	5.3	5.3	5.3	5.2
3. SOFR	CONSENSUS	3.0	2.8	2.5	2.5	2.5	2.5	2.6	2.5
	Top 10 Average	3.4	3.3	3.0	2.9	2.8	2.8	3.0	2.8
	Bottom 10 Average	2.7	2.2	2.0	2.2	2.2	2.2	2.2	2.1
4. Commercial Paper, 1-Mo	CONSENSUS	3.2	2.9	2.6	2.6	2.6	2.6	2.7	2.6
	Top 10 Average	3.5	3.4	3.1	2.9	2.9	2.9	3.0	2.9
	Bottom 10 Average	2.8	2.5	2.3	2.4	2.4	2.3	2.3	2.3
5. Treasury Bill Yield, 3-Mo	CONSENSUS	3.0	2.8	2.6	2.6	2.6	2.5	2.6	2.5
	Top 10 Average	3.6	3.4	3.1	3.1	3.0	2.9	3.1	2.9
	Bottom 10 Average	2.5	2.2	2.0	2.1	2.2	2.2	2.1	2.2
6. Treasury Bill Yield, 6-Mo	CONSENSUS	3.2	2.9	2.7	2.7	2.7	2.6	2.7	2.6
	Top 10 Average	3.8	3.6	3.2	3.2	3.1	3.0	3.2	3.0
	Bottom 10 Average	2.6	2.2	2.1	2.2	2.3	2.3	2.2	2.3
7. Treasury Bill Yield, 1-Yr	CONSENSUS	3.2	3.0	2.9	2.9	2.8	2.8	2.9	2.8
	Top 10 Average	3.9	3.8	3.5	3.4	3.3	3.2	3.4	3.2
	Bottom 10 Average	2.6	2.4	2.2	2.4	2.4	2.4	2.3	2.4
8. Treasury Note Yield, 2-Yr	CONSENSUS	3.4	3.2	3.1	3.1	3.0	3.0	3.1	3.0
	Top 10 Average	4.3	4.1	3.8	3.6	3.5	3.5	3.7	3.5
	Bottom 10 Average	2.7	2.4	2.3	2.5	2.6	2.5	2.4	2.5
9. Treasury Note Yield, 5-Yr	CONSENSUS	3.5	3.4	3.3	3.3	3.3	3.2	3.3	3.3
	Top 10 Average	4.3	4.2	4.1	3.9	3.8	3.8	3.9	3.8
	Bottom 10 Average	2.8	2.6	2.5	2.7	2.7	2.7	2.6	2.8
10. Treasury Note Yield, 10-Yr	CONSENSUS	3.5	3.5	3.4	3.5	3.5	3.4	3.5	3.5
	Top 10 Average	4.4	4.4	4.2	4.2	4.1	4.1	4.2	4.1
	Bottom 10 Average	2.8	2.5	2.6	2.9	2.9	2.8	2.7	2.8
11. Treasury Bond Yield, 30-Yr	CONSENSUS	3.8	3.8	3.8	3.9	3.8	3.8	3.8	3.9
	Top 10 Average	4.6	4.7	4.5	4.5	4.4	4.5	4.5	4.5
	Bottom 10 Average	3.0	2.9	3.0	3.3	3.2	3.2	3.1	3.2
12. Corporate Aaa Bond Yield	CONSENSUS	5.0	5.0	4.9	5.0	5.0	4.9	4.9	5.0
	Top 10 Average	5.7	5.7	5.6	5.5	5.5	5.5	5.5	5.6
	Bottom 10 Average	4.4	4.2	4.3	4.4	4.4	4.4	4.3	4.4
13. Corporate Baa Bond Yield	CONSENSUS	6.0	5.9	5.8	5.9	5.9	5.9	5.9	5.9
	Top 10 Average	6.6	6.6	6.4	6.3	6.3	6.3	6.4	6.4
	Bottom 10 Average	5.4	5.3	5.2	5.4	5.4	5.4	5.3	5.4
14. State & Local Bonds Yield	CONSENSUS	4.3	4.3	4.2	4.3	4.3	4.3	4.3	4.3
	Top 10 Average	5.0	5.0	4.8	4.8	4.7	4.7	4.8	4.8
	Bottom 10 Average	3.7	3.7	3.7	3.9	3.9	3.9	3.8	3.9
15. Home Mortgage Rate	CONSENSUS	5.7	5.5	5.4	5.4	5.4	5.4	5.4	5.4
	Top 10 Average	6.4	6.4	6.1	6.0	6.0	6.0	6.1	6.0
	Bottom 10 Average	4.9	4.7	4.6	4.8	4.8	4.8	4.7	4.8
A. Fed's AFE Nominal \$ Index	CONSENSUS	113.8	112.8	111.9	111.0	110.6	110.4	111.3	109.8
	Top 10 Average	115.6	114.7	114.0	113.4	113.1	112.8	113.6	112.7
	Bottom 10 Average	112.2	111.0	109.9	108.8	108.2	107.9	109.2	107.4
				Year-Over-Ye	ar, % Change			Five-Year	Averages
		2023	2024	2025	2026	2027	2028	2024-2028	2029-2033
B. Real GDP	CONSENSUS	2.0	2.0	2.1	2.1	2.1	2.1	2.1	2.0
	Top 10 Average	2.6	2.4	2.4	2.4	2.4	2.4	2.4	2.3
	Bottom 10 Average	1.5	1.5	1.8	1.8	1.8	1.8	1.7	1.8
C. GDP Chained Price Index	CONSENSUS	3.0	2.4	2.3	2.3	2.2	2.2	2.3	2.2
	Top 10 Average	3.7	2.8	2.7	2.6	2.6	2.6	2.7	2.6
	Bottom 10 Average	2.3	2.0	1.9	1.9	1.9	1.9	1.9	1.9
D. Consumer Price Index	CONSENSUS	3.2	2.4	2.4	2.4	2.3	2.3	2.4	2.3
	Top 10 Average	4.1	3.0	2.9	2.8	2.7	2.7	2.8	2.7
	Bottom 10 Average	2.3	1.8	2.0	2.0	1.9	1.9	1.9	1.9
E. PCE Price Index	CONSENSUS	3.0	2.3	2.3	2.3	2.3	2.2	2.3	2.3
	Top 10 Average	3.8	2.8	2.8	2.7	2.7	2.6	2.7	2.7
	Bottom 10 Average	2.2	1.8	1.9	1.9	1.9	1.8	1.9	1.9

### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Derivation of Mean Equity Risk Premium Based Studies Using Holding Period Returns and <u>Projected Market Appreciation of the S&P Utility Index</u>

<u>Line No.</u>		Implied Equity Risk Premium
1.	Historical Equity Risk Premium (1)	4.28 %
2.	Regression of Historical Equity Risk Premium (2)	5.01
3.	Forecasted Equity Risk Premium Based on PRPM (3)	5.51
4.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Value Line Data) (4)	3.97
5.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Bloomberg Data) (5)	4.75
6.	Average Equity Risk Premium (6)	4.70 %

- Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1928-2021. Holding period returns are calculated based upon income received (dividends and interest) plus the relative change in the market value of a security over a one-year holding period.
  - (2) This equity risk premium is based on a regression of the monthly equity risk premiums of the S&P Utility Index relative to Moody's A2 rated public utility bond yields from 1928 - 2021 referenced in note 1 above. Using the equation generated from the regression, an expected equity risk premium is calculated using the prospective A2 rated public utility bond yield of 5.63% (from line 3, page 3 of this Schedule).
  - (3) The Predictive Risk Premium Model (PRPM) is applied to the risk premium of the monthly total returns of the S&P Utility Index and the monthly yields on Moody's A2 rated public utility bonds from January 1928 October 2022.
  - (4) Using data from Value Line for the S&P Utilities Index, an expected return of 9.60% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A2 rated public utility bond yield of 5.63%, calculated on line 3 of page 3 of this Schedule results in an equity risk premium of 3.97%. (9.60% 5.63% = 3.97%)
  - (5) Using data from Bloomberg Professional Service for the S&P Utilities Index, an expected return of 10.38% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A2 rated public utility bond yield of 5.63%, calculated on line 3 of page 3 of this Schedule results in an equity risk premium of 4.75%. (10.38% 5.63% =
  - (6) Average of lines 1 through 5.

	[8]	Indicated Common Equity Cost Rate (3)	11.41 % 13.15 11.76 13.15 11.41 11.93	12.14 %	11.85 %	12.00 %
	[7]	ECAPM Cost Rate	11.77 % 13.27 12.07 13.27 11.77 12.22	12.39 %	12.14 %	12.27 %
Model (ECAPM)	[9]	Traditional CAPM Cost Rate	11.04 % 13.04 11.44 13.04 11.04 11.64	11.88 %	11.54 %	11.71 %
Confluence Rivers (MO) Utility Operating Company. Inc. Indicated Common Equity Cost Rate Through Use Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)	[2]	Risk-Free Rate (2)	3.96 3.96 3.96 3.96 3.96 3.96			
Confluence Rivers (MO) Utility Operating Company. Inc. Indicated Common Equity Cost Rate Through Use Asset Pricing Model (CAPM) and Empirical Capital Asse	[4]	Market Risk Premium (1)	9.98 89.9 89.9 89.9 89.9 89.9			
ers (MO) Utilit ommon Equity Model (CAPM)	[3]	Average Beta	$\begin{array}{c} 0.71 \\ 0.91 \\ 0.75 \\ 0.91 \\ 0.71 \\ 0.77 \end{array}$	0.79	0.76	0.78
	[2]	Bloomberg Adjusted Beta	0.76 0.92 0.80 0.87 0.73			
of the Traditional Capital	[1]	Value Line Adjusted Beta	0.65 0.90 0.70 0.95 0.80			
of the		Proxy Group of Six Water Companies	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities Inc. Middlesex Water Company SJW Group	Mean	Median	Average of Mean and Median

Notes on page 2 of this Schedule.

Schedule DWD-5 Page 1 of 2

#### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Notes to Accompany the Application of the CAPM and ECAPM

Notes:

(1) The market risk premium (MRP) is derived by using six different measures from three sources: Ibbotson, Value Line, and Bloomberg as illustrated below:

Historical Data MRP Estimates:	
Measure 1: Ibbotson Arithmetic Mean MRP (1926-2021)	
Arithmetic Mean Monthly Returns for Large Stocks 1926-2021: Arithmetic Mean Income Returns on Long-Term Government Bonds: MRP based on Ibbotson Historical Data:	12.37 % 5.02 7.35 %
Measure 2: Application of a Regression Analysis to Ibbotson Historical Data (1926-2021)	<u> </u>
Measure 3: Application of the PRPM to Ibbotson Historical Data: (January 1926 - October 2022)	<u>    10.89   </u> %
Value Line MRP Estimates:	
Measure 4: Value Line Projected MRP (Thirteen weeks ending November 04, 2022)	
Total projected return on the market 3-5 years hence*: Projected Risk-Free Rate (see note 2): MRP based on Value Line Summary & Index: *Forcasted 3-5 year capital appreciation plus expected dividend yield	16.40 % 3.96 12.44 %
Measure 5: Value Line Projected Return on the Market based on the S&P 500	
Total return on the Market based on the S&P 500: Projected Risk-Free Rate (see note 2): MRP based on Value Line data	$ \begin{array}{r} 16.41 & \% \\ 3.96 \\ 12.45 & \% \end{array} $
Measure 6: Bloomberg Projected MRP	
Total return on the Market based on the S&P 500: Projected Risk-Free Rate (see note 2): MRP based on Bloomberg data	12.05 % 3.96 8.09 %
Average of Value Line, Ibbotson, and Bloomberg MRP:	9.98 %
2) For reasons avalated in the Direct Testimony, the appropriate risk free rate for east of easited numbers is the ex-	ioraga faragast

(2) For reasons explained in the Direct Testimony, the appropriate risk-free rate for cost of capital purposes is the average forecast of 30 year Treasury Bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts. (See pages 9 and 10 of Schedule DWD-4.) The projection of the risk-free rate is illustrated below:

Fourth Quarter 2022	4.00	%
First Quarter 2023	4.10	
Second Quarter 2023	4.10	
Third Quarter 2023	4.00	
Fourth Quarter 2023	3.90	
First Quarter 2024	3.90	
2024-2028	3.80	
2029-2033	3.90	
	3.96	%

(3) Average of Column 6 and Column 7.

Sources of Information: Value Line Summary and Index Blue Chip Financial Forecasts, June 1, 2022 and November 1, 2022 Kroll 2022 SBBI® Yearbook Bloomberg Professional Services

## <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Basis of Selection of the Group of Non-Price Regulated Companies <u>Comparable in Total Risk to the Utility Proxy Group</u>

The criteria for selection of the Non-Price Regulated Proxy Group was that the non-price regulated companies be domestic and reported in <u>Value Line Investment Survey</u> (Standard Edition).

The Non-Price Regulated Proxy Group companies were then selected based on the unadjusted beta range of 0.49 - 0.77 and residual standard error of the regression range of 2.8333 - 3.3793 of the Utility Proxy Group.

These ranges are based upon plus or minus two standard deviations of the unadjusted beta and standard error of the regression. Plus or minus two standard deviations captures 95.50% of the distribution of unadjusted betas and residual standard errors of the regression.

The standard deviation of the Water Utility Proxy Group's residual standard error of the regression is 0.1365. The standard deviation of the standard error of the regression is calculated as follows:

Standard Deviation of the Std. Err. of the Regr. = <u>Standard Error of the Regression</u>  $\sqrt{2N}$ 

where: N = number of observations. Since Value Line betas are derived from weekly price change observations over a period of five years, N = 259

Thus, 0.1365 = 3.1063 = 3.1063 = 3.1063 = 22.7596

Source of Information: Value Line, Inc., September 2022 Value Line Investment Survey (Standard Edition)

## <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Basis of Selection of Comparable Risk <u>Domestic Non-Price Regulated Companies</u>

	[1]	[2]	[3]	[4]
Proxy Group of Six Water Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities Inc. Middlesex Water Company SJW Group	0.65 0.90 0.70 0.95 0.70 0.80	0.44 0.78 0.48 0.91 0.51 0.65	2.6059 3.3488 3.1091 2.7564 3.4761 3.3417	$\begin{array}{c} 0.0604 \\ 0.0776 \\ 0.0721 \\ 0.0639 \\ 0.0806 \\ 0.0775 \end{array}$
Average	0.78	0.63	3.1063	0.0720
Beta Range (+/- 2 std. Devs. of Beta) 2 std. Devs. of Beta	0.49 0.14	0.77		
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.8333	3.3793		
Std. dev. of the Res. Std. Err.	0.1365			
2 std. devs. of the Res. Std. Err.	0.2730			
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Source of Information: Valueline Proprietary Database, September 2022

## <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Proxy Group of Non-Price Regulated Companies Comparable in Total Risk to the <u>Proxy Group of Six Water Companies</u>

	[1]	[2]	[3]	[4]
Proxy Group of Twenty-Seven Non- Price Regulated Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Balchem Corp.	0.75	0.56	3.3474	0.0776
Becton, Dickinson	0.75	0.59	2.9969	0.0695
Black Knight, Inc.	0.75	0.56	3.1415	0.0728
Booz Allen Hamilton	0.85	0.76	3.1644	0.0733
Bristol-Myers Squibb	0.85	0.70	2.9185	0.0676
C.H. Robinson	0.70	0.54	3.3437	0.0775
Chemed Corp.	0.80	0.66	2.8403	0.0658
CSG Systems Int'l	0.75	0.56	2.8967	0.0671
CSW Industrials	0.85	0.76	3.0218	0.0700
Heartland Express	0.70	0.51	3.0304	0.0702
Henry (Jack) & Assoc	0.85	0.70	2.9759	0.0690
Lilly (Eli)	0.80	0.63	3.3732	0.0782
McCormick & Co.	0.75	0.62	3.0694	0.0711
Merck & Co.	0.80	0.63	2.9122	0.0675
Monster Beverage	0.85	0.76	2.9657	0.0687
NewMarket Corp.	0.75	0.59	2.9165	0.0676
Northrop Grumman	0.80	0.67	3.3239	0.0770
Oracle Corp.	0.80	0.67	2.8812	0.0668
Pfizer, Inc.	0.80	0.69	2.9056	0.0673
Progressive Corp.	0.75	0.60	3.0605	0.0709
Quest Diagnostics	0.80	0.62	3.2991	0.0765
RLI Corp.	0.75	0.62	2.9185	0.0676
Rollins, Inc.	0.85	0.71	3.2681	0.0758
Selective Ins. Group	0.85	0.76	3.0002	0.0695
Watsco, Inc.	0.85	0.73	2.8872	0.0669
Werner Enterprises	0.75	0.56	3.3343	0.0773
Western Union	0.80	0.68	3.0050	0.0697
Average	0.79	0.65	3.0666	0.0711
Proxy Group of Six Water Companies	0.78	0.63	3.1063	0.0720

Source of Information:

Valueline Proprietary Database, September 2022

## <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Summary of Cost of Equity Models Applied to Proxy Group of Twenty-Seven Non-Price Regulated Companies Comparable in Total Risk to the <u>Proxy Group of Six Water Companies</u>

Principal Methods	Proxy Group of Twenty-Seven Non-Price Regulated Companies
Discounted Cash Flow Model (DCF) (1)	11.29 %
Risk Premium Model (RPM) (2)	12.76
Capital Asset Pricing Model (CAPM) (3)	11.94
Mean	12.00 %
Median	11.94 %
Average of Mean and Median	<u>    11.97  </u> %

Notes:

(1) From page 2 of this Schedule.

(2) From page 3 of this Schedule.

(3) From page 6 of this Schedule.

[2] [3] [4] [6] [7]

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Bachen Corp. Bachen Corp. Bachen Corp. Bachen Corp. Bachen Devinest 143 143 143 143 143 143 143 143 143 143	Proxy Group of Twenty-Seven Non- Price Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (1)
1.43     4.50     7.70     4.80     5.67     1.47     7.14       1.7     7.00     7.00     7.00     7.01     7.00     7.09       1.7     7.00     7.50     7.50     7.50     7.50     7.99       2.08     8.50     9.00     6.14     7.88     2.16     7.99       2.08     8.50     9.00     6.14     7.88     2.16     7.91       2.08     8.50     9.00     6.14     7.88     2.16     7.91       2.05     1150     1150     11.00     7.10     7.10     7.11       2.05     1150     1150     1160     12.00     11.75       2.05     1150     1980     17.66     16.32     11.32     11.76       2.07     100     10.01     10.67     11.66     11.76       2.08     10.01     10.67     11.66     11.76       2.08     10.30     11.76     11.66     11.76       2.08     10.30     11.66     11.76     12.66     11.76       2.09     10.30     11.76     11.66     11.76     12.66       1.17     10.30     11.66     12.67     12.61       2.18     10.30     11.61     11.66 <td>ı Corp.</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>	ı Corp.							
-     1050     10.20     10.15     10.28     -     -     M       177     700     750     750     753     3.18     9.16       3127     700     730     731     7.07     7.33     3.19     7.01       312     700     7.10     7.10     7.10     7.11     7.07     7.33     3.19       0.31     12.00     NA     12.00     11.75     0.57     12.32     17.33       0.51     11.50     NA     12.00     11.75     0.57     12.32       0.53     8.50     10.00     12.00     11.75     0.57     12.32       0.53     8.50     10.20     10.67     10.67     12.32     17.32       0.53     8.00     10.20     10.67     10.67     12.32     17.32       122     11.21     9.00     14.40     10.67     10.67     12.32       123     120     10.30     14.40     10.67     10.61     12.32       124     12.00     10.30     14.40     10.67     10.61     12.32       124     12.31     10.30     11.40     12.66     11.46       125     11.41     10.50     12.32     12.46     12.46 </td <td>Dickinson</td> <td>1.43</td> <td>4.50</td> <td>7.70</td> <td>4.80</td> <td>5.67</td> <td>1.47</td> <td>7.14</td>	Dickinson	1.43	4.50	7.70	4.80	5.67	1.47	7.14
177     7.00     7.50     7.50     7.33     1.83     9.16       208     8.60     9.00     6.14     7.89     2.16     7.99       208     8.70     9.00     6.14     7.89     2.16     7.91       185     11200     7.10     7.10     7.10     7.17     7.41       186     1150     9.00     6.14     7.89     2.16     10.34       187     100     0.51     11.50     1090     0.55     11.75       054     1150     9.00     1766     16.32     1.32     17.64       1122     1150     1980     1766     16.32     1.32     7.02       307     8.00     10.00     17.66     16.32     1.32     7.02       2.1     114     5.30     5.10     17.66     1.36     7.03       307     8.00     10.20     14.88     11.66     1.26     7.04       1.141     6.103     10.30     17.66     1.18     1.166     1.167       317     9.00     10.30     17.66     1.18     1.114     5.176       1.141     6.103     10.30     1.200     1.148     1.166     1.166       1.143     1.160 <td< td=""><td>night, Inc.</td><td></td><td>10.50</td><td>10.20</td><td>10.15</td><td>10.28</td><td></td><td>NA</td></td<>	night, Inc.		10.50	10.20	10.15	10.28		NA
302     NA     5.00     4.00     4.90     3.09     7.09       1033     7.00     7.10     7.11     7.88     2.16     7.41       1155     112.00     NA     12.00     11.75     0.37     7.41       0.33     7.00     7.10     7.10     7.01     7.07     0.34     7.41       0.33     12.00     NA     12.00     11.75     0.25     11.75       0.54     11.50     NA     12.00     11.75     0.25     11.73       1.01     9.00     14.00     10.67     1.06     11.73     11.73       1.122     11.50     11.66     10.67     1.06     11.73       1.123     11.50     10.30     14.10     10.67     1.06       1.14     6.50     10.30     14.16     1.06     1.067     1.06       1.14     6.50     10.30     14.18     1.166     1.061     1.173       1.14     6.50     10.30     1.418     1.166     1.061       1.14     6.50     10.30     9.20     2.91     1.061       1.14     6.50     10.30     9.20     2.91     1.061       1.14     6.50     12.30     1.167     1.061     1	Booz Allen Hamilton	1.77	7.00	7.50	7.50	7.33	1.83	9.16
208         850         9.00         6.14         7.88         2.16         10.04           1.33         7.00         7.11         7.11         7.07         0.34         7.14           1.85         12.00         NA         13.30         11.76         0.55         11.32           0.54         11.50         9.00         0.40         13.33         10.09         0.55         11.46           1.22         11.50         9.00         14.00         10.67         11.32         11.46           1.22         11.50         19.80         17.66         16.32         11.32         17.64           1.23         10.50         10.30         14.40         16.67         17.64         17.64           1.24         10.50         10.30         14.40         16.66         11.75         12.89           1.764         15.00         10.30         14.41         11.166         2.1         10.64           1.74         3.720         10.30         14.43         11.66         11.14         5.34           1.79         3.20         10.30         12.30         11.44         5.34         10.65           1.73         3.20         12.90	Myers Squibb	3.02	NA	5.80	4.00	4.90	3.09	7.99
033         700         710         710         701         034         741           155         11200         NA         1200         1175         0.35         1336           053         850         NA         1200         1175         0.55         1175           053         850         NA         1200         1175         0.55         1232           122         1150         100         1400         1667         106         1175           122         1050         1030         1667         105         1137         1232           122         1050         1020         1080         967         322         1237           307         800         10.20         1080         957         232         126           1764         1764         770         231         1146         534         5316           179         900         800         1020         1080         927         187         534           179         550         1250         134         1166         1346         534         134           133         133         1250         1231         3359         237	C.H. Robinson	2.08	8.50	9.00	6.14	7.88	2.16	10.04
185     11200     NA     (500)     1200     196     1336       0.54     1150     NA     1330     1175     0.57     12.32       101     900     900     1400     10.67     1.06     11.73       122     1150     1980     5.10     5.10     5.13     11.22       122     1150     1980     1.766     16.67     1.289     7.05       184     500     5.10     10.80     9.67     1.32     11.73       184     500     5.10     10.80     9.67     1.32     11.73       184     500     5.10     10.80     9.67     1.32     11.76       184     1.766     16.50     1.200     1.89     7.05       280     17.66     1.300     19.80     9.67     1.84     10.61       174     17.66     1.66     1.36     7.02     1.38       281     17.66     1.300     1.980     9.70     2.91     10.61       175     176     1.23     1.36     1.176     1.14     10.61       173     3.49     1.66     1.23     1.34     10.61       173     1.33     1.23     1.34     1.06 <td< td=""><td>l Corp.</td><td>0.33</td><td>7.00</td><td>7.10</td><td>7.10</td><td>7.07</td><td>0.34</td><td>7.41</td></td<>	l Corp.	0.33	7.00	7.10	7.10	7.07	0.34	7.41
054         1150         NA         1220         1175         0.57         1233           122         101         900         900         1400         0.56         11.75           122         1150         900         1400         10.67         1.06         11.76           122         1150         1980         1766         16.32         1.32         1764           307         800         10.20         19.80         1766         16.32         1.32         1764           122         1050         10.30         14.18         11.166         3.22         1764         1764           134         6.50         10.30         14.18         11.166         1.173         70           141         6.50         12.50         0.3         30         137         3.23         12.18           179         9.00         800         10.80         9.27         187         11.14           179         11.31         7.70         7.70         7.70         1.37         11.14           179         12.50         10.80         9.27         1.87         11.14           173         0.33         12.50         12.49	tems Int'l	1.85	12.00	NA	(2.00)	12.00	1.96	13.96
c         053         850         NA         1330         1090         056         1146           121         1120         1900         900         1766         1632         1128         1713           122         1120         1980         1766         1632         1332         1728           124         500         530         510         510         513         122           124         500         1020         1030         1418         1166         -         NA           280         (150)         NA         770         770         291         1061           141         650         1250         1030         347         570         291         1061           339         650         1250         NA         770         201         387         114           339         650         1250         NA         770         201         1387         1114           133         1050         NA         770         201         1387         1114           133         1500         1220         1280         1380         1387         1387           133         1050	dustrials	0.54	11.50	NA	12.00	11.75	0.57	12.32
c 101 900 900 1400 10.7 10.6 11.7 122 11.50 1930 17.66 15.32 122 17.64 184 510 5130 9.67 3.229 307 800 10.20 10.80 9.67 3.22 12.89 184 510 510 511 11.66 2.1 10.61 141 6.50 5.30 11.66 2.1 10.61 141 6.50 2.20 3.00 144 5.54 349 6.50 13.20 NA 9.27 11.87 11.14 349 6.50 19.20 NA 9.27 11.87 11.14 143 0.32 12.00 NA 9.27 11.87 11.14 143 0.32 12.00 NA 9.27 11.87 11.14 143 10.50 11.50 NA 9.50 2.07 15.57 0.32 12.00 NA 9.50 0.386 11.187 133 9.50 12.00 NA 9.53 11.39 10.92 133 9.50 5.70 13.40 9.53 11.39 10.92 148 1.4.68 0.33 6.53 1.39 10.92 148 1.4.68 0.38 0.44 11.48 1.48 1.48 1.48 1.48 1.48 1.48	nd Express	0.53	8.50	NA	13.30	10.90	0.56	11.46
122     1150     1980     17.66     16.32     1.32     17.64       184     5.00     5.30     5.10     5.13     1.89     7.02       307     1050     10.30     10.30     14.18     11.66     -     NA       141     6.50     5.30     5.10     5.13     1.89     7.02       174     5.50     5.30     14.18     11.66     -     NA       174     6.50     10.30     14.18     11.66     -     NA       179     6.50     12.50     NA     7.70     2.91     10.61       349     6.50     12.50     NA     -     -     13.16     13.16       0.33     3.49     6.50     12.50     NA     -     -     13.16       0.33     3.55     NA     14.82     3.66     11.87     11.14       2.33     3.50     19.20     2.947     18.39     0.35     5.87       0.33     12.00     8.00     13.26     0.35     13.76     5.87       1.33     10.50     13.24     13.66     11.68       1.33     10.50     13.24     0.36     14.68       1.33     10.50     13.24     15.97     16.69<	Henry (Jack) & Assoc	1.01	9.00	9.00	14.00	10.67	1.06	11.73
184     5.00     5.30     5.10     5.13     1.89     7.02       3.07     8.00     10.20     10.80     9.67     3.22     12.89       -     10.50     10.30     11.41     11.66     -     N       2.80     (1.50)     NA     7.70     7.70     2.91     10.61       1.41     6.50     2.20     3.00     3.90     1.44     5.34       1.79     9.00     8.00     10.80     9.27     1.87     11.14       3.49     6.50     12.50     NA     7.70     2.91     10.61       1.79     9.00     10.20     10.80     9.27     1.87     13.16       0.33     12.50     NA     7.70     3.55     1.87     11.18       0.33     12.00     NA     7.70     3.55     1.87     11.18       0.33     12.00     NA     7.70     3.50     2.07     5.57       1.33     9.50     13.46     10.86     10.86     10.86       1.33     9.50     NA     13.46     10.66     10.86       1.33     9.50     8.00     10.90     9.33     13.46     10.69       1.30     9.33     10.50     NA     13.24	Lilly (Eli)	1.22	11.50	19.80	17.66	16.32	1.32	17.64
307     8.00     10.20     10.80     9.67     3.22     12.89       -     10.50     10.30     14.18     11.66     -     NA       2.0     13.00     3.90     13.16     11.44     5.34       1.70     7.70     7.70     2.91     10.61       1.41     6.50     2.20     3.00     3.90     1.44     5.34       1.79     9.00     8.00     10.80     9.27     1.87     11.14       3.49     6.50     12.50     NA     770     2.91     10.61       0.32     6.50     12.50     NA     19.89     9.36     13.16       0.33     12.00     NA     14.48     3.56     13.16       0.33     12.00     NA     14.48     3.56     13.36       1.43     10.50     NA     14.48     3.56     11.87       1.33     10.50     NA     14.48     3.56     11.87       1.33     10.50     NA     14.48     3.56     11.87       1.33     10.50     NA     14.82     3.57     3.66       1.33     10.50     NA     14.82     13.46     16.69       1.33     11.50     13.74     8.00     6.68	McCormick & Co.	1.84	5.00	5.30	5.10	5.13	1.89	7.02
.     10.50     10.30     14.18     11.66     -     NA       2.80     (1.50)     NA     7.70     7.70     2.91     10.61       1.41     (1.50)     NA     7.70     7.70     2.91     10.61       1.79     9.00     8.00     10.80     9.27     1.87     11.14       1.79     9.00     8.00     10.80     9.27     1.87     11.14       3.49     6.50     12.50     NA     9.50     3.66     13.16       0.32     6.50     12.50     NA     9.50     3.66     13.16       0.32     6.50     12.50     NA     9.50     3.66     13.16       1.43     10.50     NA     (14.82)     3.50     0.07     13.74       1.43     10.50     NA     (14.82)     3.53     10.92       1.33     9.50     NA     (14.82)     3.53     10.92       1.33     9.50     NA     13.40     9.53     10.92       1.33     9.50     NA     15.00     13.34     16.69       1.33     9.50     5.70     13.40     9.53     1.43       6.42     8.00     NA     (2.74)     8.00     6.68       1.43	Merck & Co.	3.07	8.00	10.20	10.80	9.67	3.22	12.89
280     (1.50)     NA     7.70     2.91     10.61       1.41     6.50     2.20     3.00     3.90     1.44     2.34       1.79     9.00     8.00     10.80     9.27     1.87     11.14       3.79     6.50     12.50     NA     7.70     2.91     10.61       3.79     6.50     12.50     NA     9.57     1.87     11.14       3.79     6.50     12.50     NA     14.42     3.66     13.16       0.32     6.50     12.50     NA     14.82     3.67     11.18       1.33     12.00     NA     (14.82)     3.50     0.03     10.92       1.33     10.50     NA     (14.82)     3.50     10.92     10.92       1.33     10.50     NA     (14.82)     3.50     0.03     10.92       1.33     10.50     NA     13.46     16.69     16.69       1.33     11.50     NA     13.47     16.69     16.69       1.33     11.50     NA     13.47     16.69     16.69       1.33     5.70     13.40     0.55     3.44     16.69       1.34     6.53     6.53     6.34     1.46       1.34	r Beverage		10.50	10.30	14.18	11.66		NA
141     6.50     2.20     3.00     3.90     1.44     5.34       179     9.00     8.00     10.80     9.27     1.87     11.14       324     6.50     12.50     NA     9.55     3.66     11.14       323     6.50     12.50     NA     9.50     9.56     11.14       0.33     6.50     12.50     NA     9.50     0.35     18.74       1.43     12.00     NA     14.82     3.50     2.07     5.57       1.43     12.00     NA     14.82     3.50     2.07     5.57       1.43     12.00     NA     9.80     10.90     0.98     11.88       1.33     9.50     NA     9.53     13.34     9.53     10.92       1.33     9.00     NA     15.00     13.34     1.34     16.69       1.30     9.00     NA     15.00     13.25     14.46     16.69       6.42     8.00     0.35     6.53     13.34     16.69       6.42     8.00     0.35     6.53     13.34     16.69       6.42     8.00     0.53     6.53     13.44     16.69       6.42     8.00     0.53     6.53     6.54     14.43	NewMarket Corp.	2.80	(1.50)	NA	7.70	7.70	2.91	10.61
179     9.00     8.00     10.80     9.27     1.87     11.14       3.49     6.50     12.50     NA     9.50     3.66     13.16       0.32     6.50     12.50     NA     18.74     18.74       0.32     6.50     19.20     29.47     18.39     0.35     18.74       0.32     6.50     19.20     29.47     18.39     0.35     18.74       0.33     3.50     NA     (14.82)     3.55     2.07     5.57       0.33     12.00     NA     (14.82)     3.50     0.98     11.87       1.43     10.50     NA     (14.82)     3.53     1.39     10.92       1.33     9.50     5.70     13.40     9.53     1.34     7.68       1.30     9.00     NA     15.00     13.25     3.44     16.69       6.42     8.00     NA     (2.74)     8.00     6.68     14.68       Mean     (2.74)     8.00     6.68     14.68     14.48       Mean     (2.74)     8.00     6.68     14.68       Mean     (2.74)     8.00     6.68     14.48       Mean     (2.74)     8.00     6.68     14.68       Mean     (2.74)<	p Grumman	1.41	6.50	2.20	3.00	3.90	1.44	5.34
3.49     6.50     12.50     NA     9.50     3.66     13.16       0.32     6.50     19.20     29.47     18.39     0.35     18.74       0.33     3.50     NA     (14.82)     3.50     0.35     11.88       1.43     10.50     NA     9.80     10.90     0.98     11.88       1.43     10.50     NA     9.80     10.90     0.98     11.88       1.33     9.50     5.70     13.40     9.53     1.39     10.92       1.33     9.50     5.70     13.40     9.53     1.34     16.69       1.30     9.00     3.50     6.53     6.34     1.34     7.68       6.42     8.00     NA     (2.74)     8.00     6.68     14.43       Mean     11.50     NA     (2.74)     8.00     6.68     14.43       MaFNotAvailable     NA     2.74)     8.00     6.68     14.43	orp.	1.79	00.6	8.00	10.80	9.27	1.87	11.14
0.32     6.50     19.20     29.47     18.39     0.35     18.74       2.03     3.50     NA     (14.82)     3.50     2.07     5.57       2.03     3.50     NA     (14.82)     3.50     2.07     5.57       0.93     11200     NA     (14.82)     3.50     0.036     11.88       14.3     10.50     NA     9.80     10.90     0.98     11.88       13.3     9.50     5.70     13.40     9.53     1.50     10.92       13.3     9.50     5.70     13.40     9.53     1.34     16.69       13.0     9.00     3.50     6.53     6.53     6.68     14.68       6.42     8.00     NA     (2.74)     8.00     6.68     14.48       AF hot Available     11.60     13.25     3.34     16.69     14.68	nc.	3.49	6.50	12.50	NA	9.50	3.66	13.16
2.03       3.50       NA       (14.82)       3.50       2.07       5.57         0.93       12.00       NA       9.80       10.90       0.98       11.88         1.43       10.50       NA       9.80       10.90       0.98       11.88         1.43       10.50       NA       8.20       9.35       1.50       10.85         1.33       9.50       5.70       13.40       9.53       1.39       10.92         1.33       9.50       5.70       13.40       9.53       1.34       16.69         1.33       9.00       3.50       6.53       6.34       1.34       7.68         6.42       8.00       NA       (2.74)       8.00       6.68       14.64         Mean       11.43       Mean       11.43       11.43       11.43         Ma Not Available       Average of Mean and Median       11.14       11.14	sive Corp.	0.32	6.50	19.20	29.47	18.39	0.35	18.74
0.93 12.00 NA 9.80 10.90 0.98 11.88 1.43 10.50 NA 8.20 9.35 1.50 10.92 1.33 9.50 5.70 13.40 9.53 1.39 10.92 3.23 11.50 13.25 3.44 16.69 6.42 8.00 NA (2.74) 8.00 6.68 11.44 Mean 11.43 Median 11.44 Median 11.43 Marable	iagnostics	2.03	3.50	NA	(14.82)	3.50	2.07	5.57
143     1050     NA     8.20     9.35     1.50     10.85       1.33     9.50     5.70     13.40     9.53     1.39     10.92       3.23     11.50     NA     15.00     13.40     9.53     10.92       3.23     11.50     NA     15.00     13.40     9.53     10.92       3.23     11.50     NA     15.00     13.25     3.44     16.69       1.30     9.00     3.50     6.53     6.34     1.34     7.68       6.42     8.00     NA     (2.74)     8.00     6.68     14.68       Mean     11.43     Mean     11.43	ď	0.93	12.00	NA	9.80	10.90	0.98	11.88
1.33     9.50     5.70     13.40     9.53     1.39     10.92       3.23     11.50     NA     15.00     13.25     3.44     16.69       1.30     9.00     3.50     6.53     6.34     1.34     7.68       6.42     8.00     NA     (2.74)     8.00     6.68     14.68       Mean     11.43     Mean     11.43       Ma NA NATAvailable     Average of Mean and Median     11.12	Inc.	1.43	10.50	NA	8.20	9.35	1.50	10.85
rises 3.23 11.50 NA 15.00 13.25 3.44 16.69 1.30 9.00 3.50 6.53 6.34 1.48 6.42 8.00 NA (2.74) 8.00 6.68 14.68 Mean 14.48 Mean 11.43 Median 11.14 Median 11.14 Median 11.29	e Ins. Group	1.33	9.50	5.70	13.40	9.53	1.39	10.92
rises 1.30 9.00 3.50 6.53 6.34 1.34 7.68 6.42 8.00 NA (2.74) 8.00 6.68 14.68 Mean 11.43 Median 11.14 Median 11.14 Average of Mean and Median 11.29	Inc.	3.23	11.50	NA	15.00	13.25	3.44	16.69
6.42     8.00     NA     (2.74)     8.00     6.68     14.68       Mean     11.43       Median     11.14       Mar Na	Enterprises	1.30	00.6	3.50	6.53	6.34	1.34	7.68
Mean     11.43       Median     11.14       Average of Mean and Median     11.29	ı Union	6.42	8.00	NA	(2.74)	8.00	6.68	14.68
Median     11.14       Average of Mean and Median     11.29							Mean	
Average of Mean and Median 11.29							Median	
NA= Not Available						Average of Mea	n and Median	
	N/	A= Not Available						

(1) The application of the DCF model to the domestic, non-price regluated comparable risk companies is identical to the application of the DCF to the utility proxy group. The dividend yield is derived by using the 60 day average price and the spot indicated dividend as of October 31, 2022. The dividend yield is then adjusted by 1/2 the average projected growth rate in EPS, which is calculated by averaging the 5 year projected growth in EPS provided by Value Line, www.zacks.com, and www.yahoo.com (excluding any negative growth rates) and then adding that growth rate to the adjusted dividend yield.

Value Line Investment Survey www.zacks.com Downloaded on 10/31/2022 www.yahoo.com Downloaded on 10/31/2022

Source of Information:

#### <u>Confluence Rivers (MO) Utility Operating Company. Inc.</u> Indicated Common Equity Cost Rate Through Use of a Risk Premium Model <u>Using an Adjusted Total Market Approach</u>

Line No.		Proxy Group of Twenty-Seven Non- Price Regulated Companies
1.	Prospective Yield on Baa2 Rated Corporate Bonds (1)	6.25 %
2.	Adjustment to Reflect Bond rating Difference of Non-Price Regulated Companies (2)	(0.17)
3.	Adjusted Prospective Bond Yield	6.08
4.	Equity Risk Premium (3)	6.68
5.	Risk Premium Derived Common Equity Cost Rate	12.76 %

Notes: (1) Average forecast of Baa2 corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated June 1, 2022 and November 1, 2022 (see pages 9 and 10 of Schedule DWD-4). The estimates are detailed below.

Fourth Quarter 2022 First Quarter 2023	6.30 % 6.50
Second Quarter 2023	6.50
Third Quarter 2023	6.40
Fourth Quarter 2023	6.30
First Quarter 2024	6.20
2024-2028	5.90
2029-2033	5.90
Average	6.25 %

(2) The average yield spread of Baa rated corporate bonds over A corporate bonds for the three months ending October 2022. To reflect the Baa1 average rating of the non-utility proxy group, the prosepctive yield on Baa corporate bonds must be adjusted by 1/3 of the spread between A and Baa corporate bond yields as shown below:

A Corp. Bond	Baa Corp.			
rield	Bond Yield		Spread	_
5.74	% 6.26	%	0.52	%
5.18	5.68		0.50	
4.65	5.15	_	0.50	_
Averag		0.51		
	1/3 of spread	_	0.17	_
	Yield 5.74 5.18 4.65	Yield         Bond Yield           5.74         %         6.26           5.18         5.68           4.65         5.15           Average yield spread	Yield         Bond Yield           5.74         %         6.26         %           5.18         5.68         4.65         5.15           Average yield spread	Yield         Bond Yield         Spread           5.74         %         6.26         %         0.52           5.18         5.68         0.50         4.65         5.15         0.50           Average yield spread         0.51         0.51         0.51

(3) From page 5 of this Schedule.

#### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Comparison of Long-Term Issuer Ratings for the Proxy Group of Twenty-Seven Non-Price Regulated Companies of Comparable risk to the <u>Proxy Group of Six Water Companies</u>

	Moody's Long-Term Issuer Rating October 2022		Long-Term	rd & Poor's Issuer Rating per 2022
	Long-Term		Long-Term	
Proxy Group of Twenty-Seven	Issuer	Numerical	Issuer	Numerical
Non-Price Regulated Companies	Rating	Weighting (1)	Rating	Weighting (1)
Balchem Corp.	NA		NA	
Becton, Dickinson	Baa2	9.0	BBB	9.0
Black Knight, Inc.	Ba3 *+	13.0	BB *+	12.0
Booz Allen Hamilton	NA		NA	
Bristol-Myers Squibb	A2	6.0	A+	5.0
C.H. Robinson	Baa2	9.0	BBB+	8.0
Chemed Corp.	WR		NR	
CSG Systems Int'l	NA		BB+	11.0
CSW Industrials	NA		NA	
Heartland Express	NA		NA	
Henry (Jack) & Assoc	NA		NA	
Lilly (Eli)	A2	6.0	A+	5.0
McCormick & Co.	Baa2	9.0	BBB	9.0
Merck & Co.	A1	5.0	A+	5.0
Monster Beverage	NA		NA	
NewMarket Corp.	Baa2	9.0	BBB+	8.0
Northrop Grumman	Baa1	8.0	BBB+	8.0
Oracle Corp.	Baa2 *-	9.0	BBB	9.0
Pfizer, Inc.	A2	6.0	A+	5.0
Progressive Corp.	A2	6.0	А	6.0
Quest Diagnostics	Baa2	9.0	BBB+	8.0
RLI Corp.	Baa2	9.0	BBB	9.0
Rollins, Inc.	NA		NA	
Selective Ins. Group	Baa2	9.0	BBB	9.0
Watsco, Inc.	NA		NA	
Werner Enterprises	NA		NA	
Western Union	Baa2	9.0	BBB	9.0
Average	Baa1	8.2	BBB+	7.9

Notes: (1) From page 6 of Schedule DWD-4.

Source of Information:

**Bloomberg Professional Services** 

## Confluence Rivers (MO) Utility Operating Company, Inc. Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for Proxy Group of Twenty-Seven Non-Price Regulated Companies of Comparable risk to the Proxy Group of Six Water Companies

Line No.	Equity Risk Premium Measure	Proxy Group of Twenty-Seven Non- Price Regulated Companies
		1
1.	Ibbotson Equity Risk Premium (1)	6.13 %
2.	Regression on Ibbotson Risk Premium Data (2)	7.02
3.	Ibbotson Equity Risk Premium based on PRPM (3)	9.79
4.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (4)	11.16
5	Equity Risk Premium Based on <u>Value Line</u> S&P 500 Companies (5)	11.17
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	6.81
7.	Conclusion of Equity Risk Premium	8.68 %
8.	Adjusted Beta (7)	0.77
9.	Forecasted Equity Risk Premium	6.68 %

## Notes:

- (1) From note 1 of page 8 of Schedule DWD-4.
- (2) From note 2 of page 8 of Schedule DWD-4.
- (3) From note 3 of page 8 of Schedule DWD-4.
- (4) From note 4 of page 8 of Schedule DWD-4.
- (5) From note 5 of page 8 of Schedule DWD-4.
- (6) From note 6 of page 8 of Schedule DWD-4.
- (7) Average of mean and median beta from page 6 of this Schedule.

Sources of Information:

Kroll 2022 SBBI® Yearbook <u>Value Line</u> Summary and Index Blue Chip Financial Forecasts, June 1, 2022 and November 1, 2022 Bloomberg Professional Services

Tradition	nal CAPM and ECA	.PM Results for th	e Proxy Group of	Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the <u>Proxy Group of Six Water Companies</u>	d Companies Comp	arable in Total Ri	sk to the	
	[1]	[2]	[3]	[4]	[5]	[9]	[7]	[8]
Proxy Group of Twenty-Seven Non- Price Regulated Companies	Value Line Adjusted Beta	Bloomberg Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
Balchem Corp.	0.75	0.92	0.84	% 86.6	3.96 %	12.34 %	12.74 %	12.54 %
Becton, Dickinson	0.75	0.67	0.71	9.98	3.96	11.04	11.77	11.41
Black Knight, Inc.	0.75	0.58	0.67	9.98	3.96	10.65	11.47	11.06
Booz Allen Hamilton	0.85	0.83	0.84	9.98	3.96	12.34	12.74	12.54
Bristol-Myers Squibb	0.8.0	0.53	0.69	9.98	3.96	11.65 11.64	11.62	11.23
Chamad Cam	0./.0	0.83	0.77	9.98 0.00	3.90 2.06	11.64 11 64	12.22 72.21	11.93
Criterited Corp.	0.20	0.74	0.75	9.70 0.08	3.90 3.06	11 4.4	12.22	66.11 77 11
CSW Industrials	0.85	0.00	0.84	9,98	3.96	12.34	12.74	12.54
Heartland Express	0.70	0.70	0.70	9.98	3.96	10.95	11.69	11.32
Henry (lack) & Assoc	0.80	0.76	0.78	9.98	3.96	11.74	12.29	12.02
Lilly (Eli)	0.80	0.71	0.76	9.98	3.96	11.54	12.14	11.84
McCormick & Co.	0.75	0.71	0.73	9.98	3.96	11.24	11.92	11.58
Merck & Co.	0.80	0.48	0.64	9.98	3.96	10.35	11.24	10.80
Monster Beverage	0.85	0.79	0.82	9.98	3.96	12.14	12.59	12.37
NewMarket Corp.	0.75	0.62	0.69	9.98	3.96	10.85	11.62	11.23
Northrop Grumman	0.80	0.70	0.75	9.98	3.96	11.44	12.07	11.76
Oracle Corp.	0.80	1.03	0.91	9.98	3.96	13.04	13.27	13.15
Pfizer, Inc.	0.80	0.75	0.78	9.98	3.96	11.74	12.29	12.02
Progressive Corp.	0.75	0.74	0.75	9.98	3.96	11.44	12.07	11.76
Quest Diagnostics	0.80	0.67	0.73	9.98	3.96	11.24	11.92	11.58
RLI Corp.	0.75	0.81	0.78	9.98	3.96	11.74	12.29	12.02
Rollins, Inc.	0.85	0.00	0.87	9.98	3.96	12.64	12.97	12.80
Selective Ins. Group	0.85	0.72	0.79	9.98	3.96	11.84	12.37	12.11
Watsco, Inc.	0.85	0.99	0.92	9.98	3.96 2.06	13.14	13.34	13.24
Werner Enterprises	3/.0 9.00	0.80	0.77	9.98	3.96	11.64	12.22	11.93
Western Union	0.80	0.77	0.79	9.98	3.96	11.84	12.37	12.11
Mean			0.77			11.66 %	12.23 %	11.95 %
Median			0.77			11.64 %	12.22 %	11.93 %
Average of Mean and Median			0.77			11.65 %	12.23 %	11.94 %
Notes: (1) (2) (3)	tes: (1) From Schedule DWD-5, note 1. (2) From Schedule DWD-5, note 2. (3) Average of CAPM and ECAPM cost rates.	DWD-5, note 1. DWD-5, note 2. M and ECAPM co:	st rates.					

Confluence Rivers (MO) Utility Operating Company. Inc.

Schedule DWD-7 Page 6 of 6

	[4]	Spread from Applicable Size Premium (4)		3.91%	[[0]]	Size Premium (Return in Excess of CAPM)*	-0.22% 0.43% 0.55% 0.54% 0.89% 1.18% 1.24%	
ASDAQ	[3]	Applicable Size Premium (3)	4.80%	0.89%	[C]	Market Capitalization of Largest Company (millions)	<ul> <li>\$ 2,324,390.219</li> <li>36,099.221</li> <li>16,738.364</li> <li>8,212.638</li> <li>8,212.638</li> <li>5,003.747</li> <li>5,003.747</li> <li>3,276.553</li> <li>2,164.524</li> <li>1,306.038</li> </ul>	289.007 289.007 apital Navigator
s <u>Company. Inc.</u> int Based upon s of the NYSE/AMEX/N	[2]	Applicable Decile of the NYSE/AMEX/ NASDAQ (2)	10	IJ	[B]	Market Capitalization of Smallest Company ( millions )	<ul> <li>\$ 36,160.584</li> <li>16,759.390</li> <li>8,216.356</li> <li>5,019.883</li> <li>3,281.009</li> <li>2,170.315</li> <li>1,306.402</li> <li>6,29.118</li> </ul>	*From 2022 Kroll Cost of Capital Navigator
contuence Kivers (MU) Utury Operating Company. Inc. Derivation of Investment Risk Adjustment Based upon Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAQ	[1]	Market Capitalization on October 31, 2022 (1) (times larger)		87.6 x	[A]	Decile	н О Ю 4 Ю О Р © С	
<u>Commence row</u> Derivation of I n Associates' Size Prem	[]	Market Capitalization (1) (1)	\$ 38.085	\$ 3,337.436			Largest	Smallest
Ibbotso			Confluence Rivers (MO) Utility Operating Company, Inc.	Proxy Group of Six Water Companies				Notes:
		Line No.	÷	5.				

(2) Gleaned from Columns [B] and [C] on the bottom of this page. The appropriate decile (Column [A]) corresponds to the market capitalization of the proxy group, which is found in Column [1].
(3) Corresponding risk premium to the decile is provided in Column [D] on the bottom of this page.
(4) Line No. 1 Column [3] - Line No. 2 Column [3]. For example, the 3.91% in Column [4], Line No. 2 is derived as follows 3.91% = 4.8% - 0.89%.

<u>Confluence Rivers [MO] Utility Operating Company. Inc.</u> Market Capitalization of Confluence Rivers (MO) Utility Operating Company, Inc. and the <u>Proxy Group of Six Water Companies</u>	[1]     [2]     [3]     [4]     [5]     [6]	Book Value per     Closing Stock     Market-to-Book     Market       Common Stock     Share at Fiscal     Total Common     Market Price on     Ratio on     Capitalization on       Shares Outstanding at     Year End 2021     Equity at Fiscal     October 31,     October 31,     October 31,     2022       pany     Exchange     Fiscal Year End 2021     (1)     Year End 2021     2022     (3)       (millions)     (millions)     (millions)     (millions)     (millions)	0) Utility Operating Company, Inc. NA NA \$ 11.835 (4) NA	oup of Six Water     321.8     (5)     \$     38.085     (6)	$ \begin{array}{l lllllllllllllllllllllllllllllllllll$	45.326 \$ 21.505 \$ 1,108.750 \$ 80.075 321.8 % \$ 3,337.436	NA= Not Available	Notes: (1) Column 3 / Column 1.
		Company	Confluence Rivers (MO) Utility Operating Company, Inc.	Based upon Proxy Group of Six Water Companies	Proxy Group of Six Water Companies American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities Inc. Middlesex Water Company SIW Group	Median		

(2) Column 4 / Column 2.
(3) Column 1 \* Column 4.
(4) Requested rate base multiplied by requested common equity ratio.
(5) The market-to-book ratio of Confluence Rivers (MO) Utility Operating Company, Inc. on October 31, 2022 is assumed to be equal to the market-to-book ratio of Proxy Group of Six Water Companies on October 31, 2022 as appropriate.
(6) Column [3] multiplied by Column [5].

Source of Information: 2021 Annual Forms 10K Bloomberg Financial Services

#### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Return on Common Equity Implied Based on Capital Structure of Proxy Group of Six Water Companies <u>and Weighted Average Cost of Capital</u>

[1]	[2]	[3]	[4]	[5]
Description	Weight (%)	Cost	Weighted Cost	Pre-Tax Weighted Cost
High End of Proxy Group of Six Water Cor	npanies			
Debt	37.56% (1	) 6.60%	(2) 2.48%	2.48%
Common Equity	62.44%	10.86%	(3) 6.78%	8.94% (4)
Weighted Average Cost of Capital			9.26%	11.42%
Capital Structure of Confluence Rivers				
Debt	31.44% (2	2) 6.60%	2.08%	2.08%
Common Equity	68.56%	10.34%	7.09%	9.34% (5)
Weighted Average Cost of Capital			9.16%	11.42% (6)
Indicated ROE Adjustment		-0.53%		

Notes:

- (1) High End of capital structures from Proxy Group of Six Water Companies, as shown on page 2 of Schedule DWD-2.
- (2) Company provided.
- (3) From page 2 of Schedule DWD-1.
- (4) Assuming an effective composite Federal and State income tax rate of 24.16%, the pre-tax weighted cost of common equity based on the Proxy Group of Water Companies, 10.86% common equity cost rate before adjustment and actual capital structure is 8.94%. 8.94% = 6.78%/(1 0.2416).
- (5) Pre-tax weighted cost rate of common equity equals the pre-tax overall weighted cost rate (11.42%) minus the weighted cost rate of debt based on Confluence River's proposed actual capital structure, 2.08%. 11.42% - 2.08% = 9.34%.
- (6) Pre-tax weighted overall cost of capital based on Mr. D'Ascendis's proposed overall rate of return.

#### <u>Confluence Rivers (MO) Utility Operating Company, Inc.</u> Calculation of Indicated Financial Risk Adjustment Based upon Proxy Group of Six Water Companies <u>Using the Hamada Equation</u>

Line No.	Type of Capital	Capital Structure of Confluence Rivers (1)	High End of Proxy Group of Six Water Companies (2)
1.	Long-Term Debt	31.44%	37.56%
2.	Common Equity	68.56%	62.44%
3.	Total	100.00%	100.00%
4.	Beta (3)		0.78
5.	Un-levered beta (4)		0.54
6.	Re-Levered beta (5)		0.73
7.	Market Risk Premium (6)		9.98
8.	Risk-Free Rate (7)		3.96
9.	Indicated CAPM based on High End of Equity Range (8)		11.74
10.	Indicated CAPM based on Confluence River's Capital Structure (9)		11.24
11.	Indicated Financial Risk Adjustment (10)		(0.50)

Notes:

- (1) From page 1 of Schedule DWD-1.
- (2) High End of capital structures from Proxy Group of Six Water Companies, as shown on page 2 of Schedule DWD-2.
- (3) Utility Proxy Group Beta from Schedule DWD-5, page 1.
- (4) The un-levered beta is calculated as follows:

$b_{l} = \frac{b_l}{b_l}$	Where:	
$u^{D_{u}} = [1 + \frac{D}{F}(1 - T)]$	$b_l$ = levered beta	
.76	D = Debt Ratio E = Equity Ratio	
$.52 - \frac{1}{\left[1 + \frac{37.56\%}{62.44\%}(1 - 24.16\%)\right]}$	T = Corporate Tax Rate	

(5) The beta is then re-levered using Confluence River's requested Capital Structure

$$b_{l} = b_{u} [1 + \frac{D}{E} (1 - T)]$$
  
.70 = .52[1 +  $\frac{31.44\%}{68.56\%} (1 - 24.16\%)]$ 

- (6) Market Risk Premium from Schedule DWD-5, page 1.
- (7) Risk-Free Rate from Schedule DWD-5, page 1.
- (8) Line 4 \* Line 7 + Line 8.
- (9) Line 6 \* Line 7 + Line 8.
- (10) Line 10 Line 9.