015 Exhibit No.: Issues: ROE Witness: Samuel C. Hadaway Sponsoring Party: Aquila Networks-MPS & L&P Case No.: ER-2007-0004

Before the Public Service Commission of the State of Missouri

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Surrebuttal Testimony

of

Samuel C. Hadaway

Exhibit No._ R. 200 XX Case No(s) Rptr_ Date

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI SURREBUTTAL TESTIMONY OF SAMUAL C. HADAWAY ON BEHALF OF AQUILA, INC. D/B/A AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P CASE NO. ER-2007-0004

- 1 I. INTRODUCTION AND PURPOSE OF TESTIMONY
- 2 Q. Please state your name, occupation, and business address.
- 3 A. My name is Samuel C. Hadaway. I am a Principal in FINANCO, Inc., Financial
- 4 Analysis Consultants, 3520 Executive Center Drive, Austin, Texas 78731.
- 5 Q. Did you previously file Direct and Rebuttal Testimony on behalf of Aquila,
- 6 Inc., D/B/A Aquila Networks-MPS and Aquila Networks-L&P ("MPS/LP"
- 7 or the "Company") in this proceeding?
- 8 A. Yes.
- 9 Q. What is the purpose of your Surrebuttal Testimony?
- 10 A. The purpose of my testimony is to respond to the rebuttal testimony of
- 11 Commission Staff witness David C. Parcell and the rebuttal testimony of Federal
- 12 Executive Agencies/Sedalia Industrial Energy Users' Association/St. Joe
- 13 Industrial Group ("FEA/Industrials") witness Michael Gorman.
- 14 II. <u>RESPONSE TO STAFF WITNESS PARCELL</u>

15 Q. What are Mr. Parcell's principal rebuttal comments?

- 16 A. Mr. Parcell criticizes three aspects of my rate of return recommendations:
- 17 1) Capital Structure;
- 18 2) Discounted Cash Flow ("DCF") analysis; and
- 19 3) Risk Premium analysis.
- 20 I disagree with his criticisms in each of these areas.

1 Capital Structure

2 Q. Does Mr. Parcell continue to use the Company's proposed capital structure and assigned debt costs to calculate the recommended overall rate of return? 3 4 A. Yes. 5 0. Why does he criticize your use of these same numbers? 6 On pages 2 and 3, of his rebuttal he disagrees with use of the hypothetical capital A. 7 structure that results from the Company's internal capital assignment process. At page 3, line 3, he mischaracterizes my Direct Testimony by saying that the 8 requested capital structure is based on my 24-company comparable group. 9 10 **Q**. Ho do you respond? 11 Α. While the requested capital structure is well supported by the comparable group, 12 it is clear in my testimony that the requested capital structure is "based on" the 13 Company's internal capital assignment process. 14 Q. How do you characterize Mr. Parcell's use of the results of the capital 15 assignment process? 16 A. It is a "selective" use. 17 Q. Please explain. 18 He accepts the lower debt costs that result from that process but rejects the Α. 19 process as the basis of the debt and equity percentages. As I demonstrated in my 20 Rebuttal Testimony, his position is one-sided and inconsistent with prior Staff 21 policy.

1 DCF Analysis

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2	Q.	On page 5 of his rebuttal, Mr. Parcell begins his criticism of your DCF
3		analysis by noting that that your "prediction" for higher interest rates has
4		not proven to be true. How do you respond to this criticism?
5	A.	Utility interest rates have indeed declined from the interim peak levels they
6		reached in mid-2006 when I was preparing my Direct Testimony. Projections for
7		future interest rates have also been scaled back. To reflect these factors, in my
8		Rebuttal Testimony I reduced my ROE estimate for the comparable group from
9		11.25 percent to 10.75 percent.
10	Q.	At the bottom of page 5, Mr. Parcell provides a table that shows monthly
11		utility interest rates for June-December 2006. What would Mr. Parcell's
12		interest rate table have shown if he had included a longer time period?
13	A.	While utility interest rates have declined from their highest levels in mid-2006, a
14		longer-term view of the data shows that rates are about where they were two years
15		ago and that they have actually increased since their low points in mid-2005 as
16		show by the following table:

	Long-1er	m interest.	kate Trends	
	Baa	Average	Long-Term	10-Year
	Utility	Utility	Treasury	Treasury
<u>Month</u>	Rates	Rates	Rates	Rates
Jan-05	5.95%	5.80%	4.77%	4.22%
Feb-05	5.76%	5.64%	4.61%	4.17%
Mar-05	6.01%	5.86%	4.89%	4.50%
Apr-05	5.95%	5.72%	4.75%	4.34%
May-05	5.88%	5.60%	4.56%	4.14%
Jun-05	5.70%	5.39%	4.35%	4.00%
Jul-05	5.81%	5.50%	4.48%	4.18%
Aug-05	5.80%	5.51%	4.53%	4.26%
Sep-05	5.83%	5.54%	4.51%	4.20%
Oct-05	6.08%	5.79%	4.74%	4.46%
Nov-05	6.19%	5.88%	4.83%	4.54%
Dec-05	6.14%	5.83%	4.73%	4.47%
Jan-06	6.06%	5.77%	4.65%	4.42%
Feb-06	6.11%	5.83%	4.73%	4.57%
Mar-06	6.26%	5.98%	4.91%	4.72%
Apr-06	6.54%	6.28%	5.22%	4.99%
May-06	6.59%	6.39%	5.35%	5.11%
Jun-06	6.61%	6.39%	5.29%	5.11%
Jul-06	6.61%	6.37%	5.25%	5.09%
Aug-06	6.43%	6.20%	5.08%	4.88%
Sep-06	6.26%	6.03%	4.93%	4.72%
Oct-06	6.24%	6.01%	4.94%	4.73%
Nov-06	6.04%	5.82%	4.78%	4.60%
Dec-06	6.05%	5.83%	4.78%	4.56%

Long-Term Interest Rate Trends

Sources: Mergent Bond Record (Utility Rates); www.federalreserve.gov (Treasury Rates).

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Currently, utility and Treasury bond interest rates are 40 to 60 basis points higher
than they were in mid-2005. Additionally, while interest rate forecasts have been
reduced, such forecasts still call for higher interest rates in the coming year. I
have included as Schedule SCH-19 the latest Standard & Poor's *Trends* & *Projections* publication, dated February 15, 2007. As compared to the June 15,
2006 version of that forecast, which was included as Schedule 8, page 3 of 3, of

1		my Direct Testimony, the forecast for 30-year Treasury bonds has been reduced
2		from 5.6 percent to 5.2 percent. However, relative to the December 2006 rate
3		shown in the table above, the current forecast continues to show an expected 40
4		basis point rate increase during the coming year.
5	Q.	On page 6 of his rebuttal, Mr. Parcell says that this changed interest rate
6		environment demonstrates that your reasoning for not considering the
7		"traditional" DCF model is not legitimate. How do you respond?
8	A.	His criticism is not accurate. First, I did consider the "traditional" constant
9		growth version of the DCF model. I rejected its results because they were not
10		consistent with the higher interest rates and interest rate forecasts that existed
11		when I prepared my testimony. The constant growth results were also 100 basis
12		points below alternative risk premium tests of reasonableness.
13		As I explained in my Rebuttal Testimony, Mr. Parcell's (and Mr.
14		Gorman's) singular reliance on that one version of the DCF model is a major
15		short-coming. The use of traditional growth rates based on historical data or
16		analysts' 3-to-5 year estimates is simply incorrect. The constant growth version of
17		the DCF model requires an estimate of investors' very long-term expected growth
18		rates. This growth rate cannot be observed and the basic constant growth version
19		of the DCF model cannot be derived without assuming that the "g" term remains
20		constant to infinity.
21	Q.	Have you prepared a schedule to demonstrate the inconsistency in Mr.
22		Parcell's growth rate arguments?

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1	A.	Yes, I have prepared as Schedule SCH-20 a summary of analysts' current growth
2		rate projections as compared with the same projections from 5 years ago. (An
3		earlier version of this analysis was provided in response to Data Request SIE-
4		125.) For my 24-company group, the average Value Line growth rate has
5		declined from about 7.7 percent to 5.2 percent, a drop of 2.5 percentage points.
6		Similarly, the more conservative "BR" sustainable growth rate has dropped from
7		5.8 percent to 3.8 percent. Use of such data in the constant growth DCF model is
8		not consistent with the requirement for a constant long-term growth rate. In
9		earlier years when analysts' forecasts were consistent with long-term GDP growth
10		rate forecasts, economists like Mr. Parcell complained that analysts were overly
11		optimistic. Now, with analysts' growth rates much lower, they are acceptable for
12		use in the DCF model. The inconsistency of this approach seems obvious.
13	Q.	On page 7 of his rebuttal, Mr. Parcell criticizes your GDP growth forecast
14		
14		because it is based on historical growth rates in GDP. Is it accurate to say
14		because it is based on historical growth rates in GDP. Is it accurate to say that your GDP growth rate is a simple average or historical extrapolation?
	А.	· ·
15	A.	that your GDP growth rate is a simple average or historical extrapolation?
15 16	A.	that your GDP growth rate is a simple average or historical extrapolation? No. In response to Data Request MPSC-159, I provided to Mr. Parcell the entire
15 16 17	A.	that your GDP growth rate is a simple average or historical extrapolation? No. In response to Data Request MPSC-159, I provided to Mr. Parcell the entire data base and forecast methodology I applied to develop my expected GDP
15 16 17 18	A.	that your GDP growth rate is a simple average or historical extrapolation? No. In response to Data Request MPSC-159, I provided to Mr. Parcell the entire data base and forecast methodology I applied to develop my expected GDP growth rate. I have included the summary forecast as Schedule SCH-21. While
15 16 17 18 19	Α.	that your GDP growth rate is a simple average or historical extrapolation? No. In response to Data Request MPSC-159, I provided to Mr. Parcell the entire data base and forecast methodology I applied to develop my expected GDP growth rate. I have included the summary forecast as Schedule SCH-21. While the St. Louis Federal Reserve Bank data base contains data dating back to 1947,
15 16 17 18 19 20	A.	that your GDP growth rate is a simple average or historical extrapolation? No. In response to Data Request MPSC-159, I provided to Mr. Parcell the entire data base and forecast methodology I applied to develop my expected GDP growth rate. I have included the summary forecast as Schedule SCH-21. While the St. Louis Federal Reserve Bank data base contains data dating back to 1947, my forecast is not a simple average or extrapolation of the historical data. To

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1		weight to the more recent, low inflation years also lowers the overall forecast.
2		For example, my forecast is for a future growth rate of 6.6 percent, while the
3		overall average of the data indicates a growth rate of 7 percent. In this context,
4		Mr. Parcell's criticism of my use of historical GDP data is unwarranted.
5	Q.	At the bottom of page 7 of his rebuttal, Mr. Parcell offers a table of GDP
6		forecasts that are lower than your forecast. How do you respond to this
7		comparison?
8	Α.	Interest rate forecasts and economic forecasts in general are difficult and are often
9		dominated by current data and very recent experience. I used the very long-term
10		St. Louis Federal Reserve Bank data to mitigate this well-known forecasting
11		deficiency.
12		Mr. Parcell's forecast from the Energy Information Agency (EIA) of the
13		U.S. Department of Energy is often used in GDP applications before the FERC.
14		The data presented by Mr. Parcell for 2011 to 2030 indicate a 19-year GDP
15		growth rate of 5.55 percent. The underlying EIA data for 2005 through 2030
16		indicate a growth rate of about 5.7 percent. The reason the EIA GDP growth
17		forecast is lower than mine based on the historical St. Louis Federal Reserve data
18		is because EIA projects a much lower future inflation rate. EIA projects that
19		inflation will fall to below 2 percent per year in 2008, and remain at that low level
20		throughout the forecast period.
21		This forecast is in stark contrast to historical experience. The data in
22		Schedule SCH-21 show that only one subperiod had an inflation rate as low as
23		low as 2 percent per year. While Government forecasters may hope, for policy

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1		and deficit reduction purposes, to see permanently low inflation, their recent
2		forecasts are not consistent with longer-term historical results.
3	Q.	Mr. Parcell also presents a forecast of GDP growth from the Social Security
4		Administration ("SSA") that is even lower than the EIA forecast. Have you
5		reviewed that forecast?
6	A.	Yes, I have.
7	Q.	Why is the SSA forecast lower?
8	A.	SSA develops annual very long-term forecasts to be used in its actuarial
9		evaluation of the Social Security System. Under status quo tax rates and
10		payments, and with SSA's Intermediate economic assumptions, Social Security
11		disbursements are expected to exceed receipts in 2017 and the System is expected
12		to be entirely depleted in 2040. ¹ The SSN Intermediate forecast is similar to the
13		EAI forecast in the sense that it uses an inflation rate (2.4 percent) that is below
14		the historical average. SSA's forecast for GDP growth is even lower because the
15		SSA forecast assumes that real GDP will grow at only 2 percent per year, or less,
16		beginning in 2013. In combination the 2 percent real GDP growth rate and the
17		2.4 percent assumed inflation rate produce a nominal GDP growth rate of only 4.4
18		percent, which is shown in Mr. Parcell's table.
19	Q.	Should the average of Mr. Parcell's GDP growth forecasts (4.96 percent) be
20		used to replace your GDP forecast as he does on page 9 of his rebuttal?
21	A.	No.
22	Q.	Why not?

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¹ Social Security Administration: 2006 OASDI Trustees Report (www.ssa.gov/OACT/TR/TR06/II_highlights.html)

1	A.	In his analysis on page 9, Mr. Parcell used a stale average dividend yield (4.82
2		percent) from my Direct Testimony, Schedule 9, page 2 of 5, which existed in the
3		May-June 2006 timeframe. In my Rebuttal Testimony, Schedule 15, page 2 of 5,
4		I showed that that same average dividend yield has dropped to 4.26 percent. Had
5		Mr. Parcell recalculated current dividend yields for his analysis and added his
6		4.83 percent overall average growth rate from page 9, he would have found an
7		ROE of only 9.1 percent (4.26% yield + 4.83% growth = 9.09% ROE).
8		On its face, this result is below the reasonable range and only further
9		demonstrates that the "traditional" constant growth DCF is deficient. Had he
10		performed the calculation properly, Mr. Parcell simply would have presented an
11		additional estimate that is clearly outside the reasonable range.
12	Q.	On page 10 of his rebuttal, Mr. Parcell inserts his average of GDP growth
12	v.	On page 10 of his rebuttal, Mr. 1 areen inserts his average of OD1 growin
13	ν.	estimate into your second version of the DCF model. How do you
	Q.	
13	A .	estimate into your second version of the DCF model. How do you
13 14		estimate into your second version of the DCF model. How do you characterize that result?
13 14 15	A.	estimate into your second version of the DCF model. How do you characterize that result? It is not reasonable.
13 14 15 16	А. Q.	estimate into your second version of the DCF model. How do you characterize that result? It is not reasonable. Pease explain.
13 14 15 16 17	А. Q.	estimate into your second version of the DCF model. How do you characterize that result? It is not reasonable. Pease explain. Again Mr. Parcell relied on the outdated dividend yield (4.82 percent) from my
13 14 15 16 17 18	А. Q.	estimate into your second version of the DCF model. How do you characterize that result? It is not reasonable. Pease explain. Again Mr. Parcell relied on the outdated dividend yield (4.82 percent) from my Direct Testimony. In this case he averaged that yield directly with his average of
13 14 15 16 17 18 19	А. Q.	estimate into your second version of the DCF model. How do you characterize that result? It is not reasonable. Pease explain. Again Mr. Parcell relied on the outdated dividend yield (4.82 percent) from my Direct Testimony. In this case he averaged that yield directly with his average of GDP growth forecasts (4.96 percent) to obtain an ROE estimate of 9.78 percent.
 13 14 15 16 17 18 19 20 	А. Q.	estimate into your second version of the DCF model. How do you characterize that result? It is not reasonable. Pease explain. Again Mr. Parcell relied on the outdated dividend yield (4.82 percent) from my Direct Testimony. In this case he averaged that yield directly with his average of GDP growth forecasts (4.96 percent) to obtain an ROE estimate of 9.78 percent. Had he correctly calculated a current dividend yield (4.26 percent), his result

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1		have found had he applied his GDP growth rates correctly. While such low
2		growth rate forecasts may exist, the assumptions supporting these forecasts appear
3		constrained by recent low levels of inflation that are not consistent with actual
4		data for long-term periods. A longer-term view consistent with the actual
5		experience of the U.S. economy should be used.
6		Risk Premium
7	Q.	How do you respond to Mr. Parcell's criticism of your risk premium
8		analysis?
9	A.	On page 13 of his rebuttal, lines 5-13, Mr. Parcell implies that at current interest
10		rates, my risk premium analysis indicates an ROE of only 10.2 percent (from the
11		risk premium study shown in Schedule SCH-10) or 9.0 percent to 10.0 percent
12		(from the risk premium of "recent years"). These calculations are not correct and
13		are potentially misleading.
14		In redoing my risk premium study (from Schedule SCH-10), Mr. Parcell
15		replaced my originally forecasted triple-B bond yield (6.85 percent) with a current
16		rate of 6.0 percent. This approach is incorrect because it ignores the inverse
17		relationship between interest rates and equity risk premiums, and it ignores the
18		fact that interest rates are still expected to increase over the coming year. I show
19		in Schedule SCH-22 what his result, with a 6.0 percent interest rate, should have
20		been. When the analysis is conducted properly, the risk premium at the lower
21		triple-B bond yield increases to 4.54 percent and the new indicated equity return
22		is 10.54 percent (6.0% triple-B rate + 4.54% risk premium = 10.54%).

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1		His conclusion that risk premiums from "recent years" would lead to
2		ROEs in the range of 9.0 percent to 10.0 percent is also incorrect. Averaging the
3		last three years of risk premium data from Schedule SCH-10 indicates a "recent
4		years" risk premium of 4.6 percent (average of 4.36%, 4.55%, and 4.87%).
5		Adding this "recent years" risk premium of 4.6 percent to Mr. Parcell's current
6		triple-B interest rate of 6.0 percent produces an ROE estimate of 10.6 percent. In
7		this light, the results that he provides on page 13 are not reliable.
8	Q.	What are the results of the risk premium analysis if one uses current interest
9		rate forecasts?
10	A.	I have updated my risk premium analysis in Schedule SCH-23, using the latest
11		S&P Trends & Projections from February 15, 2007. That analysis indicates that
12		an ROE of 10.83 percent is appropriate.
13	III.	RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN
13 14	III. Q.	
		RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN
14	Q.	<u>RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN</u> What are Mr. Gorman's principal rebuttal comments?
14 15	Q.	RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN What are Mr. Gorman's principal rebuttal comments? Mr. Gorman criticizes essentially every aspect of my rate of return analysis. He
14 15 16	Q.	RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN What are Mr. Gorman's principal rebuttal comments? Mr. Gorman criticizes essentially every aspect of my rate of return analysis. He disagrees with my applications of the DCF and risk premium models and he says
14 15 16 17	Q.	RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN What are Mr. Gorman's principal rebuttal comments? Mr. Gorman criticizes essentially every aspect of my rate of return analysis. He disagrees with my applications of the DCF and risk premium models and he says that my recommended adjustment to reflect MPS/LP's higher construction and
14 15 16 17 18	Q.	RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN What are Mr. Gorman's principal rebuttal comments? Mr. Gorman criticizes essentially every aspect of my rate of return analysis. He disagrees with my applications of the DCF and risk premium models and he says that my recommended adjustment to reflect MPS/LP's higher construction and operating risks is without merit. He characterizes my recommended ROE as
14 15 16 17 18 19	Q.	RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN What are Mr. Gorman's principal rebuttal comments? Mr. Gorman criticizes essentially every aspect of my rate of return analysis. He disagrees with my applications of the DCF and risk premium models and he says that my recommended adjustment to reflect MPS/LP's higher construction and operating risks is without merit. He characterizes my recommended ROE as excessive (Gorman at 1, line 10) and says that my DCF and risk premium studies
14 15 16 17 18 19 20	Q.	RESPONSE TO FEA/INDUSTRIALS WITNESS GORMAN What are Mr. Gorman's principal rebuttal comments? Mr. Gorman criticizes essentially every aspect of my rate of return analysis. He disagrees with my applications of the DCF and risk premium models and he says that my recommended adjustment to reflect MPS/LP's higher construction and operating risks is without merit. He characterizes my recommended ROE as excessive (Gorman at 1, line 10) and says that my DCF and risk premium studies are unreasonable (Gorman at 2, lines 1-2). He later says that my approach is

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1	Q.	What is your general response to Mr. Gorman's remarks?
2	A.	I entirely disagree with Mr. Gorman. I will demonstrate that his assertions are
3		incorrect and that his comments about my testimony are inappropriate.
4	Q.	At page 4 of his rebuttal, Mr. Gorman says that on page 4 of your Direct
5		Testimony you claimed to rely on consensus forecasts but used only an
6		individual forecast from S&P in your analysis. Is Mr. Gorman's criticism
7		correct?
8	A.	It is not clear why Mr. Gorman made the remarks he did. On page 4 of my Direct
9		Testimony, I stated (at lines 8-9) that I used S&P's forecast in my risk premium
10		analysis. I later said (at lines 13-14) that current DCF and risk premium estimates
11		of ROE should be tempered by consensus forecasts about future interest rates. I
12		did not make any claim that the S&P forecast is a consensus.
13	Q.	If you had used the Consensus Blue Chip Financial Forecast that Mr.
14		Gorman provided in his Rebuttal Testimony Schedule MPG-1, would your
15		conclusions or recommendations have been different?
16	A.	No. While the dates in Mr. Gorman's schedule are different than those in the S&P
17		forecast, the projections for higher interest rates are clear in both forecasts. For
18		example, in the S&P publication (Exhibit SCH-8, page 3 of 3), the projected 2007
19		rate for the 10-year Treasury note is 5.5 percent. In Mr. Gorman's Blue Chip
20		forecasts, the "March Consensus" projected rate for the 10-year Treasury note
21		fluctuates between 5.4 percent and 5.5 percent for each year shown. His criticism
22		of my source for forecasted interest rates in unwarranted.

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1	Q.	At page 4, line 26, through page 5, line 3 of his rebuttal, Mr. Gorman says
2		that your view of construction risk is inconsistent with S&P's assessment,
3		and that S&P has noted that Aquila's construction risk is "moderate and
4		declining." How do you respond?
5	A.	It is again not clear why Mr. Gorman would offer this testimony. My assessment
6		of MPS/LP construction risk is plainly presented in my Direct Testimony
7		Schedule SCH-1 and my Rebuttal Testimony Schedule SCH-17, which updates
8		the Company's construction requirements. Those schedules show that MPS/LP's
9		projected construction expenditures are 92.8 percent to 118.2 percent of existing
10		net plant. For the comparable company group the corresponding percentages are
11		58.7 percent to 60.9 percent. In terms of either relative size or absolute dollars the
12		Company's construction budget is large and the associated capital requirements
13		clearly represent a higher risk level for the Company.
14		Additionally, Mr. Gorman's reading of S&P assessment is questionable.
15		There is nothing in the S&P article that Mr. Gorman quotes on page 6 of his
16		Direct Testimony that says Aquila's construction risk is declining. S&P does state
17		that the Company's "growth-related" capital expenditures are "moderate." It is
18		incorrect and inappropriate for Mr. Gorman to selectively extrapolate these
19		comments to overall lower construction risk.
20	Q.	At pages 5 and 6 of his rebuttal, Mr. Gorman discusses "small company
21		risk" at length and concludes that such risk is already factored into the ROE
22		analysis by selecting comparable groups with appropriate bond ratings and

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1		business profile scores. Is small company risk a prominent factor in your
2		analysis and do you agree with Mr. Gorman's assessment?
3	А.	While I discuss MPS/LP's relatively small size, as well as the historical lack of a
4		fuel adjustment clause as risk factors, my recommended risk adjustment is based
5		on the Company's much higher construction requirements. Additionally, while
6		Mr. Gorman's comments might be at least partially true in some circumstances,
7		they are not on point in the present case. MPS/LP does not have an explicit bond
8		rating or business profile score. However, for the financial evaluation of MPS/LP
9		no one has contested the use of an implicit triple-B bond rating and a business
10		profile score of 6. Under these circumstances, Mr. Gorman's equivalent risk
11		discussion is wrong. The average bond ratings for the comparable group I used to
12		estimate ROE is BBB/A- and the average business profile score is 4.xx.
13		Therefore, if these were the required metrics for risk evaluation as Mr. Gorman
14		suggests, his conclusions with regard to MPS/LP relative risk would still be
15		wrong.
16	Q.	At page 9 of his rebuttal, Mr. Gorman offers estimates of GDP growth that
17		are lower than your GDP growth forecast. He proposes to use a 5.1 percent
18		growth rate in place of your 6.6 percent estimate. How do you respond?
19	A.	Mr. Gorman's analysis in this regard is similar to Mr. Parcell's presentation. Both
20		of their recommended GDP growth rate forecasts rely on long-term inflation rates
21		that are much lower than have actually been experienced in the U.S. economy. It
22		is not difficult to see why Mr. Gorman's 150 basis point reduction to the DCF
23		growth rate produces a much lower ROE estimate.

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1	Q.	At page 11 of his rebuttal, Mr. Gorman says that in your risk premium
2		analysis you apply an "inflated" equity risk premium of 4.20 percent to a
3		projected bond yield. Is your estimated risk premium inflated?
4	A.	No. As I noted in my responses to Mr. Parcell, no extensive analysis is required
5		to see that recent equity risk premiums have been above 4 percent. In fact, as
6		shown in my Schedule SCH-23, with the lower interest rates that have existed,
7		allowed risk premiums in each of the last four years have exceed 4.20 percent.
8	Q.	At page 12 of his rebuttal, Mr. Gorman criticizes your using in your risk
9		premium analysis a projected Baa utility bond yield of 6.85 percent. What is
10		your current Baa interest rate forecast?
10 11	A.	your current Baa interest rate forecast? As shown in Schedule SCH-23, my current Baa forecast is 6.5 percent. This is
	A.	
11	А.	As shown in Schedule SCH-23, my current Baa forecast is 6.5 percent. This is
11 12	А.	As shown in Schedule SCH-23, my current Baa forecast is 6.5 percent. This is based on S&P's current 30-year Treasury bond forecast of 5.2 percent plus the
11 12 13	А.	As shown in Schedule SCH-23, my current Baa forecast is 6.5 percent. This is based on S&P's current 30-year Treasury bond forecast of 5.2 percent plus the same 130 Baa interest rate spread over Treasuries that I used previously. For
11 12 13 14	А.	As shown in Schedule SCH-23, my current Baa forecast is 6.5 percent. This is based on S&P's current 30-year Treasury bond forecast of 5.2 percent plus the same 130 Baa interest rate spread over Treasuries that I used previously. For 2006, the average monthly spread of Baa utility bond yields over Treasuries was
11 12 13 14 15	A. Q.	As shown in Schedule SCH-23, my current Baa forecast is 6.5 percent. This is based on S&P's current 30-year Treasury bond forecast of 5.2 percent plus the same 130 Baa interest rate spread over Treasuries that I used previously. For 2006, the average monthly spread of Baa utility bond yields over Treasuries was 132 basis points. The analysis in Schedule SCH-23 indicates that a base ROE of

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. February 15, 2007

		Annual Rates	*****			~~;~	*********				******		(*****************	
1000	E2006	E2007	2005	ual % Cha E2006	nge E2007		20	2006 R30	E4Q		 າດ	E2007 30	40	E200
2005	52900	62007	2005	C.2000	£2007	Antonio and a set of the Antonio and the	U3	nau	C40	14	20	JL		••••••••••
	\$13:254.0	\$13,893:0	6.4	6.4	4.8	Gross Domestic Product GDP (current dollars)	\$13,197.0	\$13,323,0	\$13,487.0	\$13,668.0	\$13,820.0	\$13,966.0	\$14.116.D	\$14,298.0
6.4	6,4	4.8	0.4	0.4	4.0	Annual rate of increase (%)	5.9	3.9	5.0	5.5	4.6	4.3	4.4	5.3
3.2	3.4	2.6		-		Annual rate of increase-real GDP (%)	2.6	2.0	3.5	2.6	2.5	2.4	2.6	3.1
3.0	2.9	2.1	.	•	•	Annual rate of increase-GDP deflator (%)	3.3	1.9	1.5	2.6	2.0	1.9	1.7	2.1
				····	••••	*Components of Real GBP	******	******		**************	*******************		********	
\$7.841.0	\$8.092.0	\$8,348.0	3.5	3.2	3.2	Personal consumption expenditures	\$8,055.0	\$8,111.0	\$8,199.0	\$8,268.0	\$8,322.0	\$8.375.0	\$8,428.0	\$8,492.0
3.5	3.2	3.2	-	J.£	-	% change	2.6	2.8	4.4	3.4	2.7	2.6	2.5	3.1
1.145.3	1,204.0	1.244.0	5.5	5.1	3.3	Durable goods	1.190.3	1,208.8	1,226.5	1,249,1	1.243.0	1.240.3	1.243.7	1.258.4
2,276.8	2,363.5	2.449.6	4.5	3.8	3.7	Nondurable goods	2.351.1	2.360.1	2.399.9	2.426.3	2.441.2	2.458.1	2.472.8	2,491.2
4,436.6	4,549.0	4,680.4	2.6	2.5	2.9	Services	4,535.4	4,566.6	4,599.4	4,623.0	4,564.3	4,700.6	4,733.7	4,766
1,223.8	1,314.7	1,387.6	6.8	7.4	5.5	Nonresidental fixed investment	1,302.8	1.334.2	1.332.8	1,359.6	1,385.2	1,397.3	1,408.2	1,420.8
6.8	7.4	5.5	÷	-	+	% change	4.4	10.0	(0.4)	8.3	7.7	3.5	3.2	3.6
984. 9	1,050.7	1.097.4	8.9	6.7	4.4	Producers durable equipment	1.041.2	1,060.7	1.056.0	1.075.6	1.091.2	1,104.8	1,118.0	1,132.9
598.5	572.7	487.1	8.6	(4.3)	(15.0)	Residental fixed investment	590.6	560.6	531.1	509.0	489.3	478.5	471.5	471.
8.6	(4.3)	(15.0)	-	-		% change	(11.2)	(18.9)	(19.4)	(15.6)	(14.5)	(8.5)	(5.7)	0.0
19.7	46.4	27.7	2	-	*	Net change in business inventories	53.7	55.4	35.3	38.0	38.7	22.1	20.0	16
1,958.0	1,998.9	2.047.9	0.9	2.1	2.5	Gov't purchases of goods & services	1,991,2	1,999,4	2,017.7	2,032.5	2,041.3	2.054.0	2,063.9	2,070
727.6	741.9	760.3	1.5	2.0	2.5	Federal	736.6	738.9	747.1	753.2	757.5	763.7	766.7	768
1,230.4	1,256.8	1,287.6	0.5	2.2	2.5	State & local	1,254.4	1,260.3	1,270.5	1,279.2	1,283.7	1,290,3	1,297.2	1,301.0
(619.2)	(617.8)	(569.9)	-	-	-	Net exports	(624,2)	(628.8)	(581.4)	(591.8)	(575,7)	(562.7)	(549.3)	(536.8
1,196.1	1,302.3	1,409.9	6.8	8,9	8.3	Exports	1,288.5	1,310.0	1,341.5	1,365,8	1,394.3	1,424.0	1,455.3	1,486
1,815,3	1,920.1	1,979.7	6.1	5.8	3,1	Imports	1,912.7	1,938.8	1,922.9	1,957.6	1,970.0	1,986.7	2,004.6	2,023.2
*****	*************		••••••	**;********		**Income & Profits	************				***************	**********	*****	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
\$10,239.0	\$10,897.0	\$11,497.0	5.2	6.4	5.5	Personal income	\$10,807.0	\$10,965.0	\$11,096.0	\$11,263.0	\$11,422.0	\$11,576.0	\$11,726.0	\$11,881.0
9,036.0	9,535.0	10,040.0	4.1	5.5	5.3	Disposable personal income	9,446.0	9,598.0	9,706.0	9,846.0	9,973.0	10,106.0	10,235.0	10,379.0
(0,4)	(1.0)	(0.6)	-	-		Savings rate (%)	(1,4)	(1,2)	(1.0)	(0.8)	(0.7)	(0.6)	(0.4)	(0,4
1,518.7	1,813.5	1,867.0	32.7	19,4	3.0	Corporate profits before taxes	1,811.5	1,854.0	1,847.8	1,846.6	1,865.9	1,883.8	1,871.6	1,888.
1,119.4	1,335.9	1,378.1	32.6	19.3	3.2	Corporate profits after taxes	1,335.4	1,363.4	1,361.3	1,360,6	1,377.0	1,390.8	1,383.7	1,395.4
70.00	81.20	87.60	19.0	16.4	7.4	‡Earnings per share (S&P 500)	74.50	78.60	+=	÷1 · · · · ·	87.40	87,40	87.40	88.
***********	*************					1Prices & Interest Retes		(**************		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	******	***************	******	******
3.4	3.2	1.5		- `	•	Consumer price index	5.0	2.9	(2.2)	1,6	2.4	2.6	2.0	2.
3.1	4.7	5.0	÷	۰	•	Treasury bills	4.7	4.9	4.9	5.0	5.0	5.0	4,9	4.
4.3	4.8	4.9	-	٠	•	10-yr notes	5.1	4.9	4.6	4,8	4.9	5.0	5,1	5.
4.6	4.9	5.0	•	•	•	30-yr bonds	5.1	5.0	4.7	4.9	5.0	5.0	.5.1	5.1
5.2	5.6	5.6	*	-	÷	New issue rate-corporate bonds	5.9	5.7	5.4	5.5	5.6	5.7	5.8	5.1
*********		**************		*******		Other Key Indicators	***************		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	****2*********	**************	*****	*********	****
2,070.0	1,820.0	1,520.0	6.3	(12.3)	(16.2)	Housing starts (1,000 units SAAR)	1,870.0	1,710.0	1,560.0	1,580.0	1,500.0	1,500.0	1,520.0	1,540.0
16.9	16.5	16.4	0.5	(2.6)	(0.8)	Auto & truck sales (1,000,000 units)	16.3	16.6	16.3	16.4	16.3	16.4	16.4	16.4
5.1	4.6	4.7	-	÷.		Unemployment rate (%)	4.6	4.7	4.5	4,6	4.7	4.8	4.8	4.
(1.8)	(1,4)	(4.1)	-		4	§U.S. dollar	(12,4)	(2.1)	(0.7)	1.4	(11.6)	(5.2)	(4.8)	(5.2

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Aquila Missouri Comparison of Analysts' Growth Rates 2001 to 2006

Value Line Earnings							Value L		
No.	Company	2001	2006		No.	Company	_ 2001	2006	_
1	Alliant Energy Co.	6.5%	5.5%	_	1	Alliant Energy Co.	3.1%	3.9%	
2	Ameren	4.0%	1.0%		2	Ameren	4.0%	1.9%	
3	American Elec. Pwr.	NA	6.5%		3	American Elec. Pwr.	6.9%	5.8%	
4	CH Energy Group	5.0%	3.0%		4	CH Energy Group	5.1%	3.0%	
5	Cent. Vermont P.S.	18.0%	10.0%		5	Cent. Vermont P.S.	5.9%	3.5%	
6	Con. Edison	2.5%	2.0%		6	Con. Edison	3.7%	2.0%	
7	DTE Energy Co.	8.5%	3.0%		7	DTE Energy Co.	8.2%	3.3%	
8	Duquesne Light	-1.5%	5.0%		8	Duquesne Light	6.1%	4.5%	
9	Empire District	5.0%	9.5%		9	Empire District	3.6%	2.8%	
10	Energy East Corp.	3.5%	4.0%		10	Energy East Corp.	6.4%	2.8%	
11	Green Mtn. Power	NA	3.5%		11	Green Mtn. Power	5.4%	4.0%	
12	Hawaiian Electric	5.0%	3.0%		12	Hawaiian Electric	4.0%	3.0%	
13	MGE Energy, Inc.	NA	6.0%		13	MGE Energy, Inc.	NA	5.3%	
14	NiSource Inc.	16.0%	3.5%		14	NiSource Inc.	8.1%	3.6%	
15	Northeast Utilities	NA	8.5%		15	Northeast Utilities	5.2%	3.9%	
16	NSTAR	6.5%	7.5%		16	NSTAR	6.5%	5.8%	
17	Pinnacle West	5.5%	7.0%		17	Pinnacle West	6.0%	3.1%	
18	PPL Corporation	15.0%	11.0%		18	PPL Corporation	13.0%	10.0%	
19	Progress Energy	NA	NA		19	Progress Energy	6.6%	1.1%	
20	Puget Energy, Inc.	4.0%	5.0%		20	Puget Energy, Inc.	3.4%	3.1%	
21	SCANA Corp.	6.5%	3.5%		21	SCANA Corp.	4.6%	4.6%	
22	Southern Co.	6.0%	3.5%		22	Southern Co.	3.8%	3.8%	
23	Vectren Corp.	15.5%	3.0%		23	Vectren Corp.	7.0%	2.9%	
24	Xcel Energy Inc.	15.0%	6.0%	8 Points	24	Xcel Energy Inc.	6.6%	4.1%	% Points
				Decline		_			Decline
	Average	7.71%	5.24%	2.47%		Average	<u>5.79%</u>	3.82%	1.97%

Data Sources:

Electric: Value Line Investment Survey, Electric Utility (East), Dec 1, 2006 & Sep 7, 2001; (Central), Dec 29, 2006 & Oct 5, 2001; (West), Nov 10, 2006 & Aug 17, 2001.

Aquila Missouri GDP Growth Rate Forecast

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	Nominal GDP	% Change	GDP Price Deflator	% Channa	00	%
1947	250.0	Change		Change	CPI 22.5	Change
1948	271.6	8.7%	16.5	4.6%	22.5	7.0%
1949	268.6	-1.1%	16.3	-1.3%	23.8	-1.3%
1950	307.3	14.4%	16.9	3.6%	24.2	1.9%
1951	344.9	12.3%	17.8	5.5%	26.1	7.6%
1952	365.1	5.9%	18.1	1.7%	26.6	2.0%
1953	378.6	3.7%	18.3	1.1%	26.8	0.8%
1954	387.2	2.3%	18.5	0.9%	26.9	0.2%
1955 1956	421.2 444.7	8.8% 5.6%	18.9	2.3%	26.8	-0.2%
1957	444.7	5.6% 3.5%	19.6	3.6%	27.3	1.7%
1958	477.6	3.8%	20.2 20.6	3.0% 2.1%	28.2	3.4%
1959	514.5	7,7%	20.0	1.1%	28.9 29.2	2.5% 1.0%
1960	526.6	2.4%	21.1	1.4%	29.6	1.5%
1961	556.7	5.7%	21.4	1.2%	29.9	0.9%
1962	592.2	6.4%	21.6	1.2%	30.3	1.3%
1963	629.6	6.3%	21.9	1.2%	30.7	1.3%
1964	675.2	7.2%	22.2	1.6%	31.1	1.3%
1965	737.9	9.3%	22.7	1.9%	31.6	1.7%
1966	799.6	8.4%	23.4	3.1%	32.6	3.1%
1967	848.1	6.1%	24.1	3.2%	33.5	2.7%
1968 1969	930.2 998.7	9.7%	25.2	4.5%	34.9	4.3%
1909	996.7 1058.8	7.4% 6.0%	26.5	5.2%	36.9	5.6%
1971	1150.2	8.6%	27.9 29.2	5.2% 4.9%	39.0	5.8%
1972	1274.5	10.8%	29.2 30.5	4.9%	40.6 41.9	4.1% 3.3%
1973	1410.6	10.7%	32.4	4.2 % 6.4%	41.9 44.8	3.3% 6.8%
1974	1530.7	8.5%	35.6	9.9%	49.8	11.2%
1975	1689.0	10.3%	38.6	8.2%	54.1	8.7%
1976	1867.0	10.5%	40.8	5.7%	57.2	5.7%
1977	2083.6	11.6%	43.4	6.5%	61.0	6.6%
1978	2373.3	13.9%	46.6	7.3%	65.7	7.8%
1979	2628.5	10.8%	50.6	8.7%	73.4	11.6%
1980 1981	2871.4	9.2%	55.4	9.4%	83.2	13.3%
1982	3162.0 3304.1	10.1% 4.5%	60.1	8.6%	91.5	10.1%
1983	3643.4	4.5%	63.4 65.8	5.5% 3.7%	96.8	5.8%
1984	4010.7	10.1%	68.2	3.7%	99.9 104.2	3.2%
1985	4286.8	6.9%	70.1	2.7%	104.2	4.3% 3.6%
1986	4519.9	5.4%	71.7	2.3%	109.8	1.7%
1987	4824.0	6.7%	73.7	2.8%	114.0	3.8%
1988	5207.6	8.0%	76.4	3.7%	118.7	4.1%
1989	5571.7	7.0%	79.3	3.7%	124.5	4.9%
1990	5846.0	4.9%	82.4	4.0%	131.3	5.5%
1991	6073.0	3.9%	85.0	3.1%	136.5	4.0%
1992	6424.4	5.8%	86.9	2.3%	140.7	3.1%
1993 1994	6749.5 7160 1	5.1%	88.8	2.3%	144.8	2.9%
1995	7169.1 7479.1	6.2% 4.3%	90.7	2.1%	148.6	2.6%
1996	7939.3	4.3 <i>%</i> 6.2%	92.6 94.3	2.0% 1.9%	152.7 157.3	2.8%
1997	8422.6	6.1%	95.7	1.5%	160.7	3.0% 2.2%
1998	8867.0	5.3%	96.8	1.2%	163.2	1.6%
1999	9409.1	6.1%	98.4	1.6%	167.0	2.3%
2000	9915.0	5.4%	100.5	2.2%	172.7	3.4%
2001	10205.9	2.9%	102,9	2.4%	177.2	2.6%
2002	10565.5	3.5%	104.7	1.7%	180.2	1.7%
2003	11156.3	5.6%	106.9	2.0%	184.3	2.2%
2004	11919.7	6.8%	109.8	2.8%	189.4	2.8%
2005	12692.7	6.5%	113.0	2.9%	195.9	3.5%
10-Year Aver		5.4%		2.0%		2.5%
20-Year Aver 30-Year Aver		5.6%		2.4%		3.0%
40-Year Aver	•	7.0% 7.4%		3.7%		4.4%
50-Year Aver	•	7.4% 7.1%		4.1% 3.7%		4.7% 4.1%
58-Year Aver		7.0%		3.5%		4.1% 3.8%
Average of Pe		6.6%		3.2%		3.8%
-						2.270

Source: St. Louis Federal Reserve Bank, Economic Data - FRED II (www.research.stlouisfed.org).

Risk Premium Analysis

мос	DY'S AVERAGE	AUTHORIZED	INDICATED
	PUBLIC UTILITY	ELECTRIC	RISK
<u> </u>	BOND YIELD (1)	RETURNS (2)	PREMIUM
1980	13.15%	14.23%	1.08%
1981	15.62%	15.22%	-0.40%
1982	15.33%	15.78%	0.45%
1983	13.31%	15.36%	2.05%
1984	14.03%	15.32%	1.29%
1985	12.29%	15.20%	2.91%
1986	9.46%	13.93%	4.47%
1987	9.98%	12.99%	3.01%
1988	10.45%	12.79%	2.34%
1989	9.66%	12.97%	3.31%
1990	9.76%	12.70%	2.94%
1991	9.21%	12.55%	3.34%
1992	8.57%	12.09%	3.52%
1993	7.56%	11.41%	3.85%
1994	8.30%	11.34%	3.04%
1995	7.91%	11.55%	3.64%
1996	7.74%	11.39%	3.65%
1997	7.63%	11.40%	3.77%
1998	7.00%	11.66%	4.66%
1999	7.55%	10.77%	3.22%
2000	8.14%	11.43%	3.29%
2001	7.72%	11.09%	3.37%
2002	7.53%	11.16%	3.63%
2003	6.61%	10.97%	4.36%
2004	6.20%	10.75%	4.55%
2005	5.67%	10.54%	4.87%
2006	6.08%	<u> 10.36%</u>	4.28%
AVERAGE	9.35%	12.48%	3.13%
INDICATED COS			
	RENT TRIPLE-B UTIL		6.00%
	ANNUAL YIELD DUR	ING STUDY	<u>9.35%</u>
INTEREST RATE	E DIFFERENCE		-3.35%
	E CHANGE COEFFIC		<u> </u>
ADUSTMENT T	O AVG RISK PREMI	UM	1.41%
			0.400/
BASIC RISK PRI			3.13%
			1.41%
EQUITY RISK F			4.54%
PARCELL CURE	RENT TRIPLE-B UTIL		6.00%
	10.54%		

Sources:

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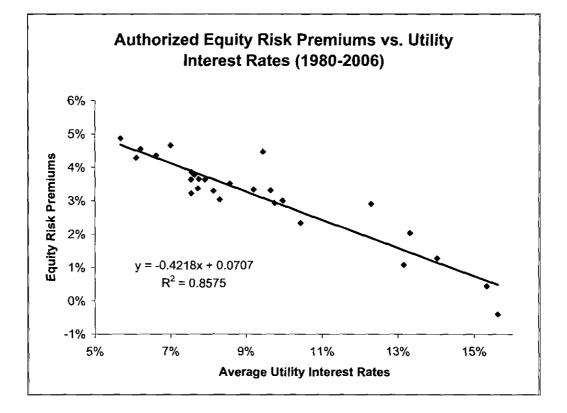
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(1) Moody's Investors Service

(2) Regulatory Focus, Regulatory Research Associates, Inc.

Risk Premium Analysis



Risk Premium Analysis

MO	ODY'S AVERAGE	AUTHORIZED	INDICATED
	PUBLIC UTILITY	ELECTRIC	RISK
	BOND YIELD (1)	RETURNS (2)	PREMIUM
1980	13.15%	14.23%	1.08%
1981	15.62%	15.22%	-0.40%
1982	15.33%	15.78%	0.45%
1983	13.31%	15.36%	2.05%
1984	14.03%	15.32%	1.29%
1985	12.29%	15.20%	2.91%
1986	9.46%	13.93%	4.47%
1987	9.98%	12.99%	3.01%
1988	10.45%	12.79%	2.34%
1989	9.66%	12.97%	3.31%
1990	9.76%	12.70%	2.94%
1991	9.21%	12.55%	3.34%
1992	8.57%	12.09%	3.52%
1993	7.56%	11.41%	3.85%
1994	8.30%	11.34%	3.04%
1995	7.91%	11.55%	3.64%
1996	7.74%	11.39%	3.65%
1997	7.63%	11.40%	3.77%
1998	7.00%	11.66%	4.66%
1999	7.55%	10.77%	3.22%
2000	8.14%	11.43%	3.29%
2001	7.72%	11.09%	3.37%
2002	7.53%	11.16%	3.63%
2003	6.61%	10.97%	4.36%
2004	6.20%	10.75%	4.55%
2005	5.67%	10.54%	4.87%
2006	6.08%	10.36%	4.28%
AVERAGE	9.35%	12.48%	3.13%
INDICATED CO			
	RIPLE-B UTILITY BOI		6.50%
	ANNUAL YIELD DUR	RING STUDY	9.35%
INTEREST RAT	E DIFFERENCE		-2.85%
INTEREST RAT	E CHANGE COEFFIC		-42.18%
	TO AVG RISK PREMI		1.20%
· · · · · · · · · · · · · · · · · · ·			
BASIC RISK PR	REMIUM		3.13%
INTEREST RA	TE ADJUSTMENT		<u> </u>
EQUITY RISK	PREMIUM		4.33%
	RIPLE-B UTILITY BOI		6.50%
			10.83%
			10.00/8

Sources:

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(1) Moody's Investors Service

(2) Regulatory Focus, Regulatory Research Associates, Inc.

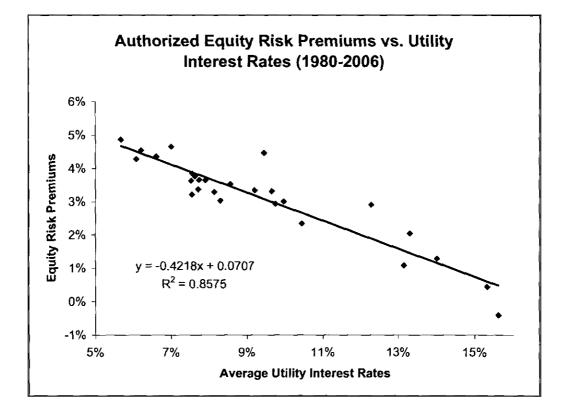
*The projected triple-B bond yield is equal to the projected 30-year Treasury bond rate (5.2 percent) from S&P's Tre Projections (Schedule SCH-19) plus 130 basis points. The average triple-B spread over Treasuries for 2006 was 13

Risk Premium Analysis

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Aquila, Inc. d/b/a Aquila Networks-MPS and Aquila Networks-L&P, for authority to file tariffs increasing electric rates for the service provided to customers in the Aquila Networks-MPS and Aquila Networks-L&P area

Case No. ER-2007-0004

County of Travis

) 58 State of Texas)

AFFIDAVIT OF SAMUEL C. HADAWAY

Samuel C. Hadaway, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Surrebuttal Testimony of Samuel C, Hadaway;" that said testimony was prepared by him and under his direction and supervision; that if inquiries were made as to the facts in said testimony and schedules, he would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of his knowledge, information, and belief.

Samuel C. Had Samuel C. Hadaway Subscribed and sworn to before me this 13th day of March 2007. Notary Public

G Faye McMullen ommission DD210138 August 09, 2007

My Commission expires:

<u>August 9,2007</u> DLH 01992963