

Exhibit No.:

Issues: Capital Costs

Witness: Donald A. Murry

Sponsoring Party: Aquila Networks-MPS
& L&P

Case No.: ER-2004-0034 &
HR-2004-0024
(Consolidated)

FILED⁴

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Missouri Public
Service Commission

Before the Public Service Commission
of the State of Missouri

Rebuttal Testimony

of

Donald A. Murry

Exhibit No. 82
Case No(s) ER-2004-0034
Date 2/23/04 Rptr KF

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI
REBUTTAL TESTIMONY OF DONALD A. MURRY, PH.D.
ON BEHALF OF AQUILA, INC.
D/B/A AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P
CASE NOS. ER-2004-0034 AND HR-2004-0024 (CONSOLIDATED)**

1 **Q. WHAT IS YOUR NAME?**

2 A. My name is Donald A. Murry.

3 **Q. ARE YOU THE SAME DONALD A. MURRY WHO FILED DIRECT**
4 **TESTIMONY PREVIOUSLY IN THIS PROCEEDING BEFORE THE**
5 **MISSOURI PUBLIC SERVICE COMMISSION (“COMMISSION”)?**

6 A. Yes, I am.

7 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

8 A. I have prepared rebuttal testimony in response to the direct testimony of
9 Commission Staff (“Staff”) witness, Mr. David Murray, and the Office of Public
10 Counsel (“Public Counsel”) witness, Mr. Mark Burdette, in the cases involving
11 Aquila Networks-MPS-Electric and Aquila Networks-L&P-Electric and Steam,
12 also referred to as “Aquila” or the “Company.”

13 **Q. WHAT IS THE NATURE OF YOUR REBUTTAL TESTIMONY OF**
14 **STAFF WITNESS DAVID MURRAY?**

15 A. My rebuttal testimony addresses the general inadequacy of Mr. Murray’s
16 recommendation for Aquila Networks and the apparent reasons for his reaching
17 an inordinately low recommended return. His recommendation is particularly
18 surprising because the results of his own analysis indicated the inadequacies of his
19 recommendation. It is clear from his testimony that he ignored important findings

1 from his analysis when he chose the recommendations that he put forward. In
2 short, his recommendations regarding the overall cost of capital, if adopted by the
3 Commission, will imperil the financial health of the Company, and he had clear
4 evidence of this from his reported analysis.

5 **Q. WHAT OTHER GENERAL COMMENTS DO YOU HAVE**
6 **CONCERNING MR. MURRAY'S TESTIMONY?**

7 A. Beyond ignoring the signals that his recommended return is financially
8 inadequate, his analysis has major flaws. For example, Mr. Murray's analysis has
9 a number of analytical and methodological problems that appear to have led to his
10 unsubstantiated conclusions and flawed recommendations. The most obvious
11 problem is his use of the capital structure of Aquila, Inc. when more accurate data
12 regarding the capital structures of the Missouri electric affiliates are available.
13 Also problems with his Discounted Cash Flow ("DCF") analysis render his results
14 unreliable. This is apparent from a simple investigation of the mechanical errors
15 and his erroneous assumptions. Fortunately, the mistakes in his Capital Asset
16 Pricing Model ("CAPM") analysis are more readily apparent. This transparency is
17 useful because it means that one can correct these errors and recalculate his
18 CAPM estimate. He also develops a Risk Premium analysis.

19 **Q. PLEASE DISCUSS IN GREATER DETAIL THE PROBLEMS WITH THE**
20 **CAPITAL STRUCTURE THAT MR. MURRAY USED IN HIS ANALYSIS.**

21 A. He stated, page 20, lines 16-17, of his direct testimony that he used the parent
22 company's, Aquila, Inc.'s, capital structure in this proceeding, "Because the debt
23 and equity are generated from the parent company...." This position has two

1 major inconsistencies. First, the capital of the parent company, Aquila, Inc.
2 includes the capital supporting the non-utility businesses and international
3 operations of Aquila, Inc. These assets do not support the Missouri electric utility
4 operations, and the Company has specifically stated its intentions, and taken
5 actions, to return to the core utility business. Consequently, Aquila, Inc.'s capital
6 structure does not represent the capital used to support the services provided by
7 Aquila Networks L&P and Aquila Networks MPS to Missouri electric customers
8 in the past. Furthermore, it is not consistent with the capital structure that will
9 support the assets of Aquila Networks L&P and Aquila Networks MPS during the
10 period when the rates set in this proceeding are in effect. Second, this capital
11 structure is inconsistent with the principle set forth by the Company in this rate
12 application, namely to isolate and to protect the utility ratepayers from the risks
13 and costs of the non-regulated operations of Aquila. Using Aquila, Inc.'s capital
14 structure with its higher financial risk violates this straightforward regulatory
15 principle, as well.

16 **Q. ARE YOU AWARE OF ANY OTHER REASONS WHY THE PARENT'S**
17 **CAPITAL STRUCTURE SHOULD NOT BE USED AS A SURROGATE**
18 **FOR THE CAPITAL STRUCTURE OF AQUILA NETWORKS L&P AND**
19 **AQUILA NETWORKS MPS?**

20 **A.** Yes. Superior information exists that more closely links the costs of capital used
21 for serving the Missouri customers to the assets used to serve the customers. This
22 is the divisional capital structure used by Aquila Networks MPS and Aquila
23 Networks L&P that takes into account the relevant risks of these utility operations

1 and was predicated on electric utility industry standards. Moreover, contrary to
2 Mr. Murray's recommended use of Aquila, Inc.'s capital structure, the Company's
3 divisional capital structure isolates the utility ratepayers from the risks of the non-
4 utility operations. Use of the parent company's capital structure exposes
5 ratepayers to higher financial risk.

6 **Q. YOU STATED THAT THE DIVISIONAL CAPITAL STRUCTURE WAS**
7 **SUPERIOR TO THE AQUILA, INC. CAPITAL STRUCTURE FOR THIS**
8 **CASE. ARE THERE ANY OTHER REASONS THAT YOU BELIEVE**
9 **THAT THIS IS THE CASE?**

10 **A.** Yes, there are. Aquila has maintained a capital allocation, or assignment, process
11 since 1988 that was designed to separate the capital costs of the divisions from the
12 other operations of Aquila, Inc. This is especially important because of the
13 significant international operations, the non-regulated operations and the utility
14 operations in other states. The target capital structure for the electric operating
15 divisions was consistent with realistic targets at that time, and as I indicated in my
16 direct testimony, it is still appropriate today. The capital structures of both MPS
17 and SJLP were known when they were blended into the parent corporation and
18 the process tracks capital changes. The resulting capital structure is superior to
19 either the use of Aquila, Inc.'s capital structure or a purely hypothetical capital
20 structure.

21 **Q. WHEN, IN YOUR OPINION, IS A HYPOTHETICAL CAPITAL**
22 **STRUCTURE APPROPRIATE FOR UTILITY RATEMAKING**
23 **PURPOSES?**

1 A. Analysts generally recognize that a hypothetical capital structure is appropriate
2 for ratemaking when the actual capital structure of a regulated utility is
3 indeterminate or not representative of capital used to support the operating utility.
4 It can serve to more accurately estimate the costs of supporting the utility as well
5 as protecting the customers from the impact of costs from non-utility operations.
6 For example, when applying the "rule" concerning use of the actual capital
7 structure, Bonbright, *et.al.*, in *Principles of Public Utility Rates*, page 309,
8 advocate that

9 ... if the existing capital structure is clearly unsound or is extravagantly
10 conservative, the rule may need to be modified in the public interest.
11 Actual cost of capital may then be disqualified in favor of legitimate cost.
12 The diversification of utilities into nonregulated activities in recent years
13 is one potential area where the rule may have to be modified. The firm's
14 overall capital structure may not be reflective of a capital structure
15 appropriate to the financing of a public utility as a consequence of risk
16 differentials between regulated and nonregulated activities.
17

18 This statement characterizes Aquila's circumstances in this proceeding.

19 **Q. HAS THE STAFF ADDRESSED THIS CONCEPT AS IT PERTAINS TO**
20 **AQUILA?**

21 A. Yes. The Staff, in a report to the Commission in December 2002, at page 21,
22 specifically summarized the merits of using a hypothetical capital structure for
23 Aquila, Inc. The Staff in that report stated as follows:

24 To prevent or mitigate Aquila's higher cost of capital from being charged
25 to Missouri ratepayers, the Commission can order the use of a hypothetical
26 capital structure for ratemaking purposes to determine the appropriate mix
27 of debt and equity that is appropriate for MPS and /or L&P. This capital
28 structure *would not be dependent on* the capital structure currently in
29 effect for Aquila. [Emphasis added].

1 Q. HAS THE COMMISSION EVER REJECTED THE USE OF AQUILA'S
2 CAPITAL STRUCTURE FOR RATEMAKING PURPOSES?

3 A. Yes. In its Report and Order on Remand in Case No. ER-93-37, page 38, the
4 Commission rejected the use of the parent's capital structure for UtiliCorp, now
5 Aquila, and stated:

6 Because MoPub must raise capital through UtiliCorp, the use of
7 UtiliCorp's consolidated capital structure may be a valid approach.
8 However, this is not the best approach for this case because UtiliCorp is
9 comprised of both operating divisions and unregulated subsidiaries, and its
10 capital structure reflects that mix.

11
12 The Commission went on to affirm, page 38, that an assigned capital
13 structure would insulate the Missouri ratepayers from the impacts from the
14 unregulated affiliates.

15 Use of MoPub's assigned capital structure will help insulate it to some
16 extent from UtiliCorp's unregulated subsidiaries, and the assigned capital
17 structure is actually analogous to the capital structures of comparable
18 electric companies.

19
20 Q. HAVE THE OPERATING DIVISIONS OF AQUILA, INC., INSULATED
21 THE MISSOURI RATEPAYERS FROM THE IMPACTS OF THE COSTS
22 OF THE UNREGULATED AFFILIATES?

23 A. Yes. The debt costs of the Missouri operating divisions are capped at the debt
24 costs of a BBB utility. Also, in my direct testimony I developed a recommended
25 cost of common stock equity based on the earnings of a group of healthy electric
26 utilities with similar financial characteristics as Aquila's Missouri operating
27 divisions.

28 Q. SHOULD MR. MURRAY HAVE RECOGNIZED THAT HIS
29 RECOMMENDED CAPITAL STRUCTURE IS INCONSISTENT WITH

1 **THE PRINCIPLES OF LINKING CAPITAL COSTS TO THE RISKS OF**
2 **THE UTILITY OPERATIONS?**

3 A. Yes, I think that he should have seen how his recommendation was inconsistent
4 with the companies that he used as comparable companies. The inconsistency, or
5 mismatch, in his recommended return on common stock and the recommended
6 common stock equity ratio is obvious, and his own analysis shows this.
7 Apparently, he has ignored the financial risk associated with his capital structure
8 recommendation.

9 **Q. CAN YOU EXPLAIN HOW MR. MURRAY'S CAPITAL STRUCTURE**
10 **AND HIS RETURN RECOMMENDATION ARE A MISMATCH?**

11 A. Mr. Murray selected a group of comparable companies with very low common
12 stock equities (averaging 36.77 percent), which is relatively close to the common
13 stock equity of the parent company, Aquila, Inc., that he recommended for
14 ratemaking purposes for this proceeding (35.31 percent). I have reproduced
15 columns (1) and (5) from his Schedule 20 in my Rebuttal Schedule DAM -1,
16 which compares the actual common equity returns of his comparable companies
17 with his recommended returns for Aquila Networks L&P and Aquila Networks
18 MPS. The common equity level that he recommends for Aquila Networks L&P
19 and Aquila Networks MPS in this proceeding is similar to the common equity of
20 these companies. However, the estimated 2003 return on common stock equity for
21 his group of comparable companies averaged 12.83 percent.

1 **Q. AS AN ANALYST, WERE YOU SURPRISED THAT MR. MURRAY'S**
2 **COMPARABLE COMPANIES EARNED SUCH A HIGH COMMON**
3 **EQUITY RETURN IN TODAY'S, THE 2003, MARKET?**

4 A. That companies with these low equity ratios, or high financial risk, have such
5 high common equity returns is not surprising. However, what is surprising is Mr.
6 Murray's recommended return for Aquila Networks MPS and Aquila Networks
7 L&P (from 8.64 percent to 9.64 percent) which is clearly way out of line and
8 *inconsistent with the actual returns of his comparable companies, and he did not*
9 attempt to reconcile this obvious inconsistency (See Mr. Murray's Schedule 20).

10 **Q. YOU MENTIONED PROBLEMS WITH MR. MURRAY'S ANALYSIS.**
11 **WHAT ARE THESE PROBLEMS?**

12 A. From an initial review of his analysis, it is obvious that Mr. Murray has selected a
13 group of companies as surrogate "comparable companies" to determine the cost
14 of capital to assign to two small operating utility divisions, Aquila Networks MPS
15 and Aquila Networks L&P, that are, in fact, not comparable at all.

16 **Q. PLEASE EXPLAIN.**

17 A. As his Schedule 11 indicates, he accepted companies that had a capitalization of
18 \$5 billion as comparable to these two small utilities. This step in his analysis
19 probably was compounded by other analytical missteps. The first of these was the
20 inclusion of two utilities in his analysis, DQE, Inc. (Duquesne Light Holdings)
21 and IDACORP, as comparable companies that are inappropriate for ratemaking
22 purposes.

23 **Q. WHY ARE THESE COMPANIES INAPPROPRIATE?**

1 A. These companies have decreased their dividend payouts because of financial
2 exigencies in recent years, and as a result, they are not representative of healthy
3 electric utilities. Consequently, they are useless as comparative utility standards in
4 this proceeding. This is so because one cannot draw useful inferences about
5 returns required for a healthy electric utility by looking at the performance of an
6 unhealthy utility. Because of their financial difficulties, the earnings and
7 dividends of these utilities are not reliable standards for ratemaking, and they are
8 entirely inappropriate as comparable utilities in an analysis.

9 **Q. ARE THERE OTHER PROBLEMS WITH MR. MURRAY'S ANALYSIS?**

10 A. Yes. Mr. Murray makes several analytical mistakes, some of which are very basic
11 mistakes, in his DCF analysis. These diminish the reliability of his analysis and
12 reduce its results to uselessness. In addition, as stated previously, his CAPM
13 analysis has obvious mistakes.

14 **Q. OTHER THAN THE PROBLEMS THAT YOU MENTIONED, ARE**
15 **THERE OTHER REASONS TO AVOID SELECTING LARGE**
16 **COMPANIES AS COMPARABLE COMPANIES IN AN ANALYSIS OF**
17 **SMALLER COMPANIES?**

18 A. Yes, analysts agree that small companies are normally more risky than large
19 companies because of lower economies of scale and scope in operations and less
20 liquidity. *Smaller companies have a narrower, less diverse customer base with a*
21 *smaller geographic market. They also have more limited access to capital markets*
22 *and relatively higher financial costs. Mr. Murray provides no evidence that he*
23 *makes any adjustment for this risk differential.*

1 Q. YOU STATED THAT MR. MURRAY HAS INCLUDED UTILITIES THAT
2 HAVE REDUCED THEIR DIVIDENDS BECAUSE OF FINANCIAL
3 EXIGENCIES AMONG HIS COMPARABLE ELECTRIC UTILITY
4 COMPANIES. PLEASE EXPLAIN WHY THIS IS IMPORTANT?

5 A. This is important in this case because these utilities are not appropriate for the use
6 as comparable companies, or standards, in a regulatory proceeding. As I said, both
7 DQE and IDACORP have reduced their dividends recently because of significant
8 financial exigencies, and a dividend reduction will impact common equity
9 investors immediately.

10 Q. IS THERE EVIDENCE THAT THIS IS THE CASE WITH DUQUESNE
11 LIGHT?

12 A. *Value Line* said about Duquesne Light, "On balance, in our view, DQE's
13 potential stock returns to 2006-2008 do not fully compensate for all risk."
14 Further, *Value Line* stated on June 6, 2003, "The typical utility investor will
15 probably want to look elsewhere." Duquesne Light Holdings has been unwinding
16 its unregulated ventures as well as trying to reach a settlement with the Internal
17 Revenue Service about past tax payments. These non-utility factors are not
18 appropriate utility ratemaking standards.

19 Q. WHAT FINANCIAL DISTRESS HAS IDACORP EXPERIENCED THAT
20 MR. MURRAY SHOULD HAVE NOTED?

21 A. IDACORP has recorded losses associated with its non-utility operations, which
22 have affected its financial condition. *Value Line* reported that, "The annual
23 dividend was reduced from \$1.86 to \$1.20 a share, effective with the December

1 payment. The action was taken because profits didn't cover the disbursement in
2 2002 and probably won't this year or next." It is illogical to use the losses from
3 non-utility operations as a standard for setting an allowed return for a regulated
4 utility.

5 **Q. SHOULD MR. MURRAY HAVE KNOWN THAT THESE COMPANIES**
6 **WOULD NOT BE USEFUL AS REGULATORY STANDARDS FOR**
7 **RATEMAKING?**

8 A. Yes. In the case of these two utilities, the reductions of dividends were clear
9 signals that they were under severe financial stress and not good candidates as
10 comparative standards in a rate proceeding. In fact, these well-known financial
11 circumstances were covered in the *Value Line* sources that he cited, and this
12 should preclude any analyst from using them as ratemaking standards. Their use
13 would bias the results of any analysis and make them unreliable.

14 **Q. HOW DID USING THESE TWO COMPANIES AFFECT MR. MURRAY'S**
15 **ANALYSIS?**

16 A. Mr. Murray's Schedule 14 illustrates how he used the financial stress of these
17 companies in his mechanical averaging process to offset the expectations of
18 investors of returns in healthy electric utilities. In the case of DQE, he averaged
19 the historical declines in earnings, dividends and book values of -7.19 percent to
20 offset the expected future growth in earnings of three different analytical groups,
21 i.e., IBES median (4.00 percent), Standard & Poor's earnings per share (4.00
22 percent) and Value Line earnings per share (7.50 percent). Although all of these
23 analysts agree that DQE has turned around its past financial problems, Mr.

1 Murray, without any justification, reported that investors expect "growth" to
2 decline 1.01 percent. This decrease is the growth rate that he used in his DCF
3 analysis. He does not explain whether this "growth" refers to a growth rate in
4 earnings per share, dividends or some combination of the two.

5 In the case of IDACORP, Mr. Murray averaged together historical growth
6 of earnings, book values and dividends and reports a historical growth rate of 0.10
7 percent. Then he averaged this average with a predicted -11.0 percent decline in
8 earnings and two growth rates of 7.00 percent. He reported a measured "growth"
9 of IDACORP of only 0.55 percent.

10 **Q. WHAT ARE THE CONSEQUENCES OF MR. MURRAY'S**
11 **CALCULATIONS?**

12 **A.** It is apparent that by *mechanically averaging the financial characteristics of these*
13 *utilities under stress into his DCF analysis as regulatory standards, Mr. Murray*
14 *produced unreliable, biased estimates of the cost of capital of an electric utility.*
15 *In fact, these calculations provide no basis for concluding the necessary return for*
16 *a healthy standalone electric utility.*

17 **Q. WAS MR. MURRAY AWARE THAT HE USED COMPANIES THAT**
18 **WERE UNDER SEVERE FINANCIAL STRESS AS REGULATORY**
19 **STANDARDS IN HIS ANALYSIS?**

20 **A.** It appears that Mr. Murray either did not know or did not use the financial health
21 of his comparable companies as a criterion. For example, he was asked the
22 following question in Data Request Number 0627, "Is it Mr. Murray's opinion
23 that a regulatory body should base its allowed return on the performance of a

1 comparable company in financial stress?" His reply, in its entirety, was the
2 following: "It is Mr. Murray's opinion that a regulatory body should base its
3 allowed return on a comparable group of companies when a company-specific
4 analysis cannot be performed."

5 **Q. IS IT OBVIOUS THAT A UTILITY COMPANY THAT CUTS ITS**
6 **DIVIDEND IS LIKELY IN FINANCIAL STRESS?**

7 A. Although financial stress is not the only reason that a company will cut its
8 dividend, most boards of directors will try to support a dividend to maintain a
9 common stock's attractiveness to investors and to avoid increasing the cost of
10 raising equity capital. In other words, a cut in dividends is a signal to any analyst
11 to look behind this reduction for its cause.

12 **Q. DID MR. MURRAY IDENTIFY THE REASONS THAT DQE AND**
13 **IDACORP RECENTLY CUT THEIR DIVIDEND, WHICH MADE THEM**
14 **UNRELIABLE STANDARDS FOR RATEMAKING PURPOSES?**

15 A. It is not clear that Mr. Murray even considered the ability to pay a dividend as an
16 indicator of a healthy utility. It was not a criterion for selecting comparable
17 companies that he identified in his Schedule 11. He was asked the following
18 question in Data Request Number 0627, "Is it Mr. Murray's opinion that if a
19 company reduces its dividend, this may be an indicator that a company is under
20 some financial stress?" He replied, as follows:

21 A reduction in dividend can be an indicator of many things with one of
22 them being the possibility that the company needs to conserve cash for
23 debt service payments because of financial difficulties. Another indicator
24 may be that a company wants to conserve cash for purposes of investing in
25 attractive investment opportunities in the future. Yet another indicator may

1 be that the company may want to conserve cash in order to improve its
2 creditworthiness regardless of whether it is having financial difficulties.

3
4 After stating on page 24, line 24 of his direct testimony that one of the
5 assumptions underlying his DCF analysis was a "Constant growth in cash
6 dividends," his response to this question was rather surprising.

7 **Q. WHY IS THIS THE CASE?**

8 A. His response to the data request implies that companies readily cut their
9 dividends, which of course, violates this assumption underlying his DCF analysis.

10 **Q. ARE THERE OTHER PROBLEMS WITH MR. MURRAY'S GROUP OF**
11 **COMPARABLE COMPANIES?**

12 A. Yes. He identified the bond rating of DPL as BBB. Instead, DPL's bond rating
13 should be identified as BB, which is not investment grade. Although DPL did not
14 cut its dividend, it took a substantial after tax charge to earnings following the
15 settlement of a court case charging security law violations and a writedown to
16 assets because of a devaluation of the Argentina peso. These non-utility impacts
17 are also not representative of financial characteristics of a healthy electric utility.

18 **Q. YOU STATED PREVIOUSLY THAT MR. MURRAY COMMITTED**
19 **ANALYTICAL ERRORS THAT AFFECTED HIS DCF ANALYSIS.**
20 **WHAT ERRORS WERE YOU REFERRING TO IN THIS STATEMENT?**

21 A. Throughout Mr. Murray's DCF methodology he averaged averages. This
22 substitutes a mindless set of calculations and averages for an analysis of the
23 market data and masks the essence of the DCF analysis, which relies on market
24 information to infer investors' discounted values of anticipated returns. Mr.
25 Murray's series of averages simply hides from analytical view and subsequent

1 interpretation the various market valuations. It substitutes cursory mechanical
2 calculations and averages for serious analytical interpretation. Consequently, his
3 formulistic calculations were reduced to meaningless data manipulations.

4 **Q. WHAT WERE YOU REFERRING TO WHEN YOU STATED THAT MR.**
5 **MURRAY MADE ERRORS IN HIS CAPM CALCULATIONS?**

6 A. Mr. Murray made three obvious mistakes in his CAPM analysis. Each caused him
7 to underestimate the cost of common stock using this method. Taken together,
8 these errors are significant. It is important, however, that they are readily
9 identifiable and correctable.

10 **Q. CAN YOU EXPLAIN THESE ERRORS IN THE CAPM ANALYSIS THAT**
11 **ARE IMPORTANT, BUT SUBJECT TO CORRECTION?**

12 A. Yes. First, Mr. Murray used a negative risk premium to calculate his CAPM.
13 This assumption is contrary to the basic theoretical construct of the CAPM and
14 without any precedent or theoretical justification. At minimum, if Mr. Murray
15 thought for some reason that the "risk premium" actually was negative, he should
16 have explained why such a theoretical anomaly occurred. Second, he selected an
17 incorrect risk premium from the source he cited. Apparently he erred by selecting
18 the wrong number from the page that he cited as a reference. Third, he failed to
19 make a recommended adjustment for empirical bias when the data that he used in
20 his CAPM called for this adjustment. The authors of the data source that he cited
21 recommended this correction, and he just ignored their recommendation.

1 **Q. YOU SAID THAT MR. MURRAY USED A NEGATIVE RISK PREMIUM**
2 **IN HIS CAPM ANALYSIS. PLEASE EXPLAIN THE SIGNIFICANCE OF**
3 **THIS.**

4 A. It is an illogical assumption, and it will lead to meaningless calculations. In his
5 Schedule 17, Mr. Murray identified a short-term risk premium of -0.34 percent.
6 However, a negative risk premium in a CAPM analysis is not logical. It implies
7 that the investors in the common stocks of the analyzed companies, in this case
8 Mr. Murray's comparable companies, believe that these common stocks are less
9 risky investments than U.S. Treasury bonds.

10 **Q. COULD YOU TELL IF MR. MURRAY INTENDED TO INTRODUCE**
11 **THIS ILLOGICAL ASSUMPTION INTO HIS CAPM ANALYSIS?**

12 A. This is not clear. In response to Data Request Number 0629, he stated, "Mr.
13 Murray is not recommending that a negative risk premium be used in determining
14 the required return on equity in a regulatory proceeding." However, from his
15 calculations, as illustrated in Schedule 17, it is apparent that this is exactly what
16 he did. In this schedule he shows the results of estimating a CAPM cost of equity
17 ($4.92\% = 5.16\% + (.72 * -0.34\%)$). He also cites this 4.92 percentage at page 30,
18 line 4 of his Direct Testimony. These calculations imply that a rational investor
19 would pass up a virtually certain return of 5.16 percent from an investment in
20 U.S. Treasury bonds in favor of a less certain, or more risky return, of 4.92
21 percent from an investment in the common stocks of his comparable companies.
22 The illogic, or even silliness, of this assumption is even more apparent when one

1 recognizes that Mr. Murray's comparable companies include companies under
2 severe financial stress.

3 **Q. YOU STATED THAT MR. MURRAY SELECTED THE WRONG**
4 **NUMBER FROM ONE OF HIS CITED SOURCES. CAN YOU EXPLAIN?**

5 A. Yes. Mr. Murray did not select the correct number for a risk premium for his
6 CAPM analysis from the source, Ibbotson Associates, which he cited in Schedule
7 17. He stated that the risk premium is 6.4 percent. In fact, the risk premium in the
8 source that he cited is 7.0 percent. I have enclosed the appropriate table as my
9 Rebuttal Schedule DAM -2.

10 **Q. YOU STATED THAT MR. MURRAY IGNORED A METHODOLOGICAL**
11 **RECOMMENDATION FROM ONE OF HIS SOURCES. PLEASE**
12 **EXPLAIN.**

13 A. Because of known biases in the data favoring large firms, Ibbotson Associates,
14 which is the source that he used in his CAPM analysis, recommends making a
15 size adjustment based on the market capitalization of the company when the data
16 are used for a CAPM analysis. Ibbotson Associates, which he cited in this
17 Schedule 17, even recommends the level of adjustment to compensate for this
18 bias. Mr. Murray ignored the presence of this bias and Ibbotson Associates'
19 recommended adjustment. This recommended change is also explained by
20 Ibbotson Associates in the attached schedule.

21 **Q. YOU STATED THAT MR. MURRAY'S CAPM ANALYSIS WAS**
22 **CORRECTABLE. DID YOU CORRECT THESE ANALYTICAL ERRORS**
23 **AND RECALCULATE THE CAPM USING HIS METHODOLOGY?**

1 A. Yes.

2 **Q. WHEN YOU CORRECTED MR. MURRAY'S CAPM ANALYSIS, WHAT**
3 **RESULTS DID HIS METHODOLOGY PRODUCE?**

4 A. When calculated correctly, after correcting for these three errors, Mr. Murray's
5 CAPM analysis produced an estimate of the cost of common stock for his
6 comparable companies of 11.35 percent. Notably, the corrected CAPM produces
7 a return on equity estimate of 13.68 percent for Aquila, Inc. I have shown these
8 calculations using his methodology in Rebuttal Schedule DAM -3.

9 **Q. YOU MENTIONED MR. MURRAY'S RISK PREMIUM ANALYSIS. ARE**
10 **YOU OFFERING REBUTTAL TESTIMONY CONCERNING THIS**
11 **CALCULATION?**

12 A. No. Mr. Murray's risk premium analysis, albeit a rather general analysis, is
13 indicative of the longer-term valuations of the common stock of his comparable
14 companies. His risk premium analysis produced a result of 11.51 percent. It is
15 notable that this risk premium result is very similar to the average CAPM
16 calculation for his comparable companies.

17 **Q. WHY DID YOU STATE THAT THE RESULTS OF MR. MURRAY'S**
18 **TESTIMONY IMPERILED THE FINANCIAL CONDITION OF THE**
19 **COMPANY?**

20 A. His recommended capital structure and his recommended return together, as
21 shown by his own interest coverage analysis, show that he disregarded his
22 analysis of financial integrity in addition to ignoring sound financial practice.

1 **Q. WHAT FINANCIAL INTEGRITY MEASURES DID MR. MURRAY**
2 **DISREGARD?**

3 A. He calculated before tax interest coverage ratios to test the range of his rate of
4 return recommendation, and he reported these in his Schedule 21. However, he
5 either dismissed these results or misinterpreted them.

6 **Q. WHAT IS THE EVIDENCE THAT HE DISMISSED OR**
7 **MISINTERPRETED HIS FINANCIAL INTEGRITY MEASURES?**

8 A. I have reproduced interest coverages from column (3) of Mr. Murray's Schedule
9 20 and the Pre-Tax Interest Coverage which he calculated on Schedule 21 using
10 his return recommendation and illustrated this comparison in Rebuttal Schedule
11 DAM-4. It shows that the average Pre-Tax Interest Coverage of his comparable
12 companies is 2.65. This calculation included a "0" interest coverage for
13 IDACORP that he did not exclude when he calculated this average. As this
14 schedule also shows, Mr. Murray's calculated coverages using his recommended
15 return for Aquila Networks L&P and Aquila Networks MPS would only be in the
16 range of 2.11 to 2.23 times, or way below the interest coverage ratios of his
17 comparable companies.

18 **Q. YOU STATED PREVIOUSLY THAT YOU WERE OFFERING**
19 **TESTIMONY IN REBUTTAL OF PUBLIC COUNSEL WITNESS, MR.**
20 **MARK BURDETTE, IS THAT CORRECT?**

21 A. Yes. It is my understanding, however, that Mr. Burdette may no longer be a
22 participant in this proceeding. As a consequence and to provide context to my

1 rebuttal testimony, I am attaching a copy of Mr. Burdette's verified direct
2 testimony in this case as Rebuttal Schedule DAM – 5.

3 **Q. PLEASE SUMMARIZE YOUR REBUTTAL WITH RESPECT TO MR.**
4 **BURDETTE'S DIRECT TESTIMONY.**

5 A. Mr. Burdette's selection of comparable companies was extremely weak
6 methodologically. In addition, he used a calculation of the growth rate for use in
7 his DCF method that is generally recognized by analysts to be analytical flawed.
8 He adjusted his CAPM analysis arbitrarily because of a result that he judged to be
9 an outlier. Additionally, he rejected the Company's proposed capital structure
10 although it is consistent with the capital structure of the companies that he chose
11 as comparable companies to set a return in this proceeding. His proposed return
12 on common equity also is out of line with companies in the industry with
13 comparable common equity ratios. Finally, his proposed interest coverage ratio
14 does not match those of his comparable companies.

15 **Q. PLEASE DISCUSS YOUR CONCERNS ABOUT MR. BURDETTE'S**
16 **COMPARABLE COMPANY SELECTION.**

17 A. He selected four companies to include in his group of companies as comparable,
18 but two of these are directly affected by a single, very concentrated financial
19 impact. These companies are Central Vermont Public Service and Green
20 Mountain Power, both of which are Vermont utilities. More important, both of
21 these companies are still recovering from the financial setback of a single action,
22 the Vermont Joint Operating Agreement and subsequent long-term contracts with
23 Hydro-Quebec. Because half of the data that he used to develop an analysis for

1 the return of these Missouri operating divisions rely on these two Vermont
2 companies, his analysis is methodologically very weak. Stated differently,
3 because Mr. Burdette's analysis is dominated by the financial statistics of a
4 narrow slice of the electric utility industry, which is so geographically and
5 operationally remote to Missouri, it measures operational risks and financial costs
6 of Missouri utilities only by rare coincidence.

7 **Q. WHAT DCF METHOD DOES MR. BURDETTE USE THAT HAS**
8 **SERIOUS ANALYTICAL FLAWS?**

9 A. Mr. Burdette uses a method called the "Sustainable Growth" or "Plowback
10 Growth" method.

11 **Q. IS MR. BURDETTE'S USE OF THE SUSTAINABLE GROWTH**
12 **METHOD FOR HIS DCF CALCULATION RECOMMENDED BY THE**
13 **FINANCIAL LITERATURE?**

14 A. No. The economic literature recognizes that the sustainable growth (or plowback)
15 method is unsound both mathematically and empirically.

16 **Q. CAN YOU PROVIDE AN EXAMPLE OF THE CRITICISM OF THIS**
17 **METHOD RECOGNIZED IN FINANCE LITERATURE?**

18 A. Yes, Roger Morin's *Regulatory Finance: Utilities' Cost of Capital*, pages 161-
19 162, is a good reference because it addresses the use of the method in regulation
20 specifically. For example, Dr. Morin identified three problems associated with
21 using the sustainable growth method. He points out the difficulty in using the
22 method to accurately estimate growth in a DCF analysis, as follows:

23 "..."it may be even more difficult to estimate what b , r , s , and v investors
24 have in mind than it is to estimate what g they envisage. It would appear

1 far more economical and expeditious to use available growth forecasts and
2 obtain g directly instead of relying on four individual forecasts of the
3 determinants of such growth...”
4

5 He adds that it possesses a serious conceptual flaw, which he explains, as follows:

6 “Second, there is a potential element of circularity in estimating g by a
7 forecast of b and ROE for the utility being regulated, since ROE is
8 determined in large part by regulation. To estimate what ROE resides in
9 the minds of investors is the equivalent to estimating the market’s
10 assessment of the outcome of regulatory hearings...”
11

12 Finally, he notes that the sustainable growth method is inferior to other more
13 direct methods for measuring growth in a DCF, and that the financial literature
14 has demonstrated this. He states, as follows:

15 “Thirdly, the empirical finance literature demonstrates that the sustainable
16 growth method of determining growth is not as significantly correlated to
17 measures of value, such as stock price and price/earnings ratios, as other
18 historical growth measures or analysts’ growth forecasts...”
19

20 “In summary, of the three proxies for the expected growth component of
21 the DCF model, historical growth rates, analysts’ forecasts, and the
22 sustainable growth method, the latter is the least desirable...”
23

24 **Q. HOW DOES MR. BURDETTE ADJUST HIS CAPM TO CONTROL FOR**
25 **A RESULT HE CONSIDERS TO BE A STATISTICAL OUTLIER?**

26 A. He recalculated his CAPM averages without CLECO Corporation, which he
27 considered too high or an outlier.

28 **Q. HOW DO YOU CHARACTERIZE THIS EXCLUSION?**

29 A. It is not justifiable methodologically to remove a calculation just because it is a
30 high number. For example, an analyst could have arbitrarily concluded, just as
31 easily, that Central Vermont Public Service was an outlier on the low side.

1 **Q. HOW DOES PUBLIC COUNSEL WITNESS BURDETTE'S PROPOSED**
2 **CAPITAL STRUCTURE COMPARE IN TERMS OF RISK TO THE ONE**
3 **PROPOSED BY THE COMPANY?**

4 A. It is more risky.

5 **Q. PLEASE EXPLAIN.**

6 A. A fundamental tenet of finance is that a more leveraged company has more
7 financial risk than a less leveraged company. Another way of saying this is that
8 the greater the portion of a company's capital is debt, then the greater the
9 financial risk. Hence, the company's costs of capital will be higher.

10 **Q. DID MR. BURDETTE CONSIDER THE CAPITAL STRUCTURES OF HIS**
11 **COMPARABLE COMPANIES?**

12 A. It appears that he did not. His comparable companies have equity ratios of 46.78
13 percent compared to his proposed capital structure of 40.14 percent. I have
14 reproduced this comparison from his Schedule MB-3 from his testimony as my
15 Rebuttal Schedule DAM-6. From his comparison, it is obvious that the equity
16 ratios of his comparable companies are more in line with the divisional capital
17 structure of Aquila Networks MPS and Aquila Networks L&P than Aquila, Inc.'s
18 capital structure that Mr. Burdette proposed.

19 **Q. IS THERE ANYTHING IN ADDITION THAT CONCERNS YOU ABOUT**
20 **MR. BURDETTE'S PROPOSED CAPITAL STRUCTURE IN THIS CASE?**

21 A. Yes, his Schedule MB-1 shows a sharp decrease in the capital structure of Aquila,
22 Inc., from 2001 of 56.1 percent to 2002 of 40.1 percent. The latter is the basis for
23 his recommended capital structure in this proceeding for the Missouri affiliates.

1 This volatility in the common equity of a company is not characteristic of the
2 capital structure of an electric utility. Because of the stability of the long-lived
3 assets required to provide utility service and the permanent sources of capital to
4 build these assets, the capital structures of utilities normally change very slowly
5 over time, and this occurs as a consequence of the issuance of blocks of securities.

6 This volatility of the common equity ratio alone demonstrates that the capital
7 structure that he is proposing in this proceeding cannot be the germane utility
8 capital structure of the electric divisions of Aquila, Inc., in Missouri.

9 **Q. DO YOU KNOW WHAT ACCOUNTS FOR THIS SHARP DECLINE IN**
10 **THE COMMON EQUITY OF AQUILA?**

11 A. Yes, the current common equity of Aquila declined so rapidly and is so low
12 because Aquila sold the non-regulated assets at current values and the erosion of
13 the value of the common stock. There has been no erosion of the planned, and
14 executed, utility equity component. This is further confirmation that Aquila's
15 capital structure is not the correct capital structure to use in this proceeding.

16 **Q. WHY DID YOU SAY THAT PUBLIC COUNSEL WITNESS MARK**
17 **BURDETTE'S RETURN ON EQUITY JUDGMENT IS OUT-OF-LINE**
18 **WITH THE INDUSTRY?**

19 A. I compared the actual return on common stock of his comparable companies to
20 his proposed return on common stock in this proceeding, as shown in Rebuttal
21 Schedule DAM-7. This schedule shows that his comparable companies have an
22 average return on common stock equity of 11.5 percent. This is much higher than
23 his proposed range of 9.6 to 10.1 percent.

1 **Q. HOW DOES MR. BURDETTE'S PROPOSED INTEREST COVERAGE**
2 **RATIO COMPARE TO THE COVERAGE RATIOS THAT HE**
3 **CALCULATED FOR HIS COMPARABLE COMPANIES?**

4 **A.** The before tax interest coverage ratio that will result from Mr. Burdette's
5 recommend allowed return is in the range of 2.40 times to 2.47 times, as shown in
6 his schedule MB-10. In contrast, his Schedule MB-3 reports ranges of coverages
7 of his comparable companies from 3.00 to 4.10 times, and they average 3.43
8 times. I have juxtaposed these results in Rebuttal Schedule DAM-8. This
9 indicates that the recommended allowed return by Mr. Burdette will provide an
10 interest coverage that is far below his calculations of interest coverage for the
11 companies that he selected as comparable companies.

12 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

13 **A.** Yes, it does.

Aquila Networks – MPS and SJLP

Summary of Rebuttal Schedules

Rebuttal Schedule DAM-1: Selected Financial Ratios

**Rebuttal Schedule DAM-2: Table C-1 from Ibbotson Associates 2003 S&P
Yearbook: Valuation Edition**

Rebuttal Schedule DAM-3: Capital Asset Pricing Model

**Rebuttal Schedule DAM-4: Witness Murray's Before Tax Interest Coverage
Ratios**

Rebuttal Schedule DAM-5: Direct Testimony of OPC Witness Mark Burdette

Rebuttal Schedule DAM-6: Common Equity Ratios

Rebuttal Schedule DAM-7: Returns on Common Equity for 2002

**Rebuttal Schedule DAM-8: Witness Burdette's Before Tax Interest Coverage
Ratios**

Aquila Networks - MPS & SJLP

Selected Financial Ratios

For Staff Witness Murray's Comparable Electric Utilities

Company Name	Year 2002 Common Equity to Total Capital Ratio	2003 Projected Return on Common Equity
Cleco Corporation	38.20%	12.50%
DPL, Inc	24.70%	17.50%
DQE, Inc.	25.50%	19.50%
Hawaiian Electric Industries, Inc.	46.50%	9.50%
IDACORP, Inc.	47.90%	4.50%
NSTAR	37.80%	13.50%
Average	36.77%	12.83%

Source: Direct Testimony of Staff Witness David Murray, Schedule 20

Table C-1

Key Variables in Estimating the Cost of Capital

				Value
Yields (Riskless Rates)¹				
Long-term (20-year) U.S. Treasury Coupon Bond Yield				4.8%
Intermediate-term (5-year) U.S. Treasury Coupon Note Yield				2.6
Short-term (30-day) U.S. Treasury Bill Yield				1.2
Equity Risk Premium²				
Long-horizon expected equity risk premium: large company stock total return minus long-term government bond income returns				7.0
Intermediate-horizon expected equity risk premium: large company stock total returns minus intermediate-term government bond income returns				7.4
Short-horizon expected equity risk premium: large company stock total returns minus U.S. Treasury bill total returns				8.4
Size Premium³				
Decile	Market Capitalization of Smallest Company (in millions)		Market Capitalization of Largest Company (in millions)	Size Premium (Return in Excess of CAPM)
Mid-Cap, 3-5	\$1,144.452	-	\$5,012.705	0.82%
Low-Cap, 6-8	\$314.174	-	\$1,143.845	1.52
Micro-Cap, 9-10	\$0.501	-	\$314.042	3.53
Breakdown of Deciles 1-10				
1-Largest	\$11,636.618	-	\$293,137.304	-0.32
2	\$5,018.316	-	\$11,628.735	0.42
3	\$2,686.479	-	\$5,012.705	0.66
4	\$1,691.463	-	\$2,680.573	0.95
5	\$1,144.452	-	\$1,691.210	1.16
6	\$791.917	-	\$1,143.845	1.48
7	\$521.400	-	\$791.336	1.35
8	\$314.174	-	\$521.298	2.06
9	\$141.529	-	\$314.042	2.56
10-Smallest	\$0.501	-	\$141.459	5.67
Breakdown of the 10th Decile				
10a	\$64.798	-	\$141.459	3.98
10b	\$0.501	-	\$64.767	9.16

¹ As of December 31, 2002. Maturities are approximate.

² Expected risk premia for equities are based on the differences of historical arithmetic mean returns from 1926-2002 using the S&P 500 as the market benchmark.

³ See chapter 7 for complete methodology.

Note: Examples on how these variables can be used are found in Chapters 3 and 4

AQUILA, INC.
CASE NOS. RE-2004-0034 and HR-2004-0024

Capital Asset Pricing Model (CAPM) Cost of Common Equity Estimates
for the Comparable Electric Utility Companies

Company Name	Risk Free Rate	Company's Value Line Beta	Market Risk Premium	Size Premium	CAPM Cost of Common Equity
Cleco Corporation	5.16%	0.90	7.00%	1.52%	12.98%
DPL, Inc	5.16%	0.80	7.00%	0.82%	11.58%
DQE, Inc.	5.16%	0.65	7.00%	1.52%	11.23%
Hawaiian Electric Industries, Inc.	5.16%	0.55	7.00%	0.82%	9.83%
IDACORP, Inc.	5.16%	0.75	7.00%	1.52%	11.93%
NSTAR	5.16%	0.65	7.00%	0.82%	10.53%
Average		0.72			11.35%
Aquila, Inc.	5.16%	1.00	7.00%	1.52%	13.68%

Sources: Direct Testimony of Staff Witness David Murray, Schedule 17, Schedule DAM R-2

Aquila Networks - MPS & SJLP

Before Tax Interest Coverage Ratios

For Staff Witness Murray's Comparable Electric Utilities

Company Name	Pre-Tax Interest Coverage Ratio
Cleco Corporation	3.10
DPL, Inc	3.30
DQE, Inc.	3.60
Hawaiian Electric Industries, Inc.	3.00
IDACORP, Inc.	0.00
NSTAR	2.90
Average	2.65

Source: Direct Testimony of Staff Witness David Murray, Schedule 20

Direct Testimony of Mark Burdette
Witness for the Office of Public Counsel

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**DIRECT TESTIMONY
OF
MARK BURDETTE**

**AQUILA, INC. D/B/A
AQUILA NETWORKS MPS AND AQUILA NETWORKS L&P
CASE NO. ER-2004-0034**

INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Mark Burdette, P.O. Box 7800, Jefferson City, Missouri 65102-7800.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Office of the Public Counsel of the State of Missouri (OPC or Public Counsel) as a Public Utility Financial Analyst. Also, I am an adjunct faculty member with Columbia College. I teach undergraduate Business Finance, undergraduate Investments and graduate-level Managerial Finance.

A. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.

Q. I earned a Bachelor of Science in Electrical Engineering from the University of Iowa in May 1988. I earned a Master's in Business Administration with double emphases in Finance and Investments from the University of Iowa Graduate School of Management in December 1994.

Q. PLEASE DESCRIBE YOUR CONTINUING EDUCATION.

A. I have attended various regulatory seminars presented by the Financial Research Institute, University of Missouri-Columbia and the National Association of State Utility Consumer

1 Advocates. Also, I attended The Basics of Regulation: Practical Skills for a Changing
2 Environment presented by the Center for Public Utilities, New Mexico State University.

3 Q. DO YOU HAVE ANY PROFESSIONAL AFFILIATIONS?

4 A. Yes. I am a member of the Society of Utility and Regulatory Financial Analysts (SURFA).

5 Q. DO YOU HOLD ANY PROFESSIONAL DESIGNATIONS?

6 A. Yes. I have been awarded the professional designation Certified Rate of Return Analyst
7 (CRRRA) by the Society of Utility and Regulatory Financial Analysts. This designation is
8 awarded based upon work experience and successful completion of a written examination.

9 Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MISSOURI PUBLIC
10 SERVICE COMMISSION (MPSC OR THE COMMISSION)?

11 A. Yes.

12 Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?

13 A. I will present a cost-of-capital (rate of return) analysis for the regulated electricity
14 operations of Aquila, Inc., d/b/a Aquila Networks-MPS and Aquila Networks-L&P. I will
15 recommend and testify to the capital structure, embedded cost of long-term debt, fair return
16 on common equity, and weighted overall cost of capital that should be allowed in this
17 proceeding.

18 Q. HAVE YOU PREPARED SCHEDULES IN SUPPORT OF YOUR TESTIMONY?

19 A. Yes. I have prepared an analysis consisting of eleven schedules that is attached to this
20 testimony (MB-1 through MB-10). This analysis was prepared by me and is correct to the
21 best of my knowledge and belief.

22

1 ANALYSIS

2 Q. WHAT DO YOU BELIEVE IS THE FINANCIAL MARKETS' VIEW OF REGULATED
3 UTILITIES?

4 A. I believe the financial markets recognize that regulated utilities remain a stable investment
5 with relatively low risk compared to the market overall. Many companies have suffered
6 reduced credit worthiness due to their forays into unregulated ventures. The myriad failures
7 of unregulated operations in the energy industry have tainted the view of traditional regulated
8 utilities. Those companies entering unregulated operations appeared - indeed were - more
9 risky overall, which would be reflected in investors' increasing their required rates of return
10 on those companies' securities. But the increased risk was not due to regulated operations,
11 and the increased cost of capital for those companies is not reflective of the returns required
12 by investors for regulated utility operations.

13 According to a report by Standard & Poor's entitled "Key Issues Affecting Credit
14 Quality for US Utility Companies" (October 6, 2003):

15 The ratings trend year-to-date for the traditional, nondiversified, and
16 regulated US investor-owned electric and gas industry remains relatively
17 stable, with little of the downward pressure experienced elsewhere in the
18 energy industry.

19
20 Downward rating pressure on these companies typically results from the
21 strained credit quality of their nonregulated affiliates. With limited
22 exceptions, regulation has continued to remain relatively supportive of
23 credit quality.
24

25 Q. WHY IS THE DISTINCTION BETWEEN THE RISK OF REGULATED VERSUS
26 UNREGULATED OPERATIONS AN IMPORTANT FACTOR FOR THE MISSOURI
27 PUBLIC SERVICE COMMISSION TO REMEMBER AND CONSIDER?

28 A. The distinction is important because in this proceeding the Commission will authorize a
29 return on equity, cost of debt and overall cost of capital for the **regulated utility**
30 **operations** of Aquila, Inc. The Commission should be wary of arguments that attempt to

1 paint a bleak picture of the financial markets' view of regulated utilities and the risk
2 associated with regulated operations.

3
4 **CAPITAL STRUCTURE**

5 Q. IS AQUILA, INC. AN INDEPENDENT, PUBLICLY TRADED COMPANY?

6 A. Yes. Aquila, Inc. (Aquila) is a public corporation. Its stock trades under the ticker symbol
7 ILA.

8 Q. ARE AQUILA NETWORKS-MPS AND AQUILA NETWORKS-L&P INDEPENDENT,
9 PUBLIC CORPORATIONS?

10 A. No. Aquila Networks (both MPS and L&P) are operating divisions of Aquila, Inc., and
11 therefore are not separate corporations. All of the corporate financing of Aquila Networks
12 is handled through the only existing corporate entity, Aquila, Inc. The operating divisions do
13 not have their own separate legal identities or financing.

14 Q. DO THE OPERATING DIVISIONS HAVE THEIR OWN SEPARATE CAPITAL
15 STRUCTURES?

16 A. No. Both operating divisions are supported by the consolidated capital structure of Aquila,
17 Inc. All capital is raised and provided to the divisions by Aquila.

18 Q. WHAT CAPITAL STRUCTURE IS APPROPRIATE TO USE TO SET THE RATE OF
19 RETURN (WEIGHTED AVERAGE COST OF CAPITAL) FOR AQUILA NETWORKS-
20 MPS AND AQUILA NETWORKS-L&P?

21 A. The capital structure that is appropriate is the capital structure of Aquila, Inc. It is the only
22 capital structure that actually exists for Aquila or any of its operating divisions. Any
23 'allocated' or 'target' capital structures for Aquila Networks-MPS and Aquila Networks-
24 L&P are purely fictitious and are inappropriate to use to calculate a regulated rate of return.

25

1 Q. WHAT CAPITAL STRUCTURE DO YOU RECOMMEND FOR THIS PROCEEDING?

2 A. I recommend Aquila, Inc.'s actual capital structure as of the end of the test year (31
3 December 2002) be used to calculate the overall rate of return that is appropriate for the
4 Company's regulated electricity operations within the state of Missouri. Public Counsel is
5 willing to update the capital structure to 30 September 2003 (the update period for this
6 proceeding) to calculate the final rate of return.

7 According to the Aquila, Inc.'s 2002 Annual Report to Shareholders and the
8 Company's 10K report filed with the SEC, at 31 December 2002, Aquila's capital structure
9 consisted of 40.14% common equity and 59.86% long-term debt (net, less current
10 maturities). This capital structure was utilized for my calculation of overall rate of return
11 (ROR) and is shown on Schedule MB-2. I recommend this capital structure be used in this
12 proceeding to calculate Aquila's overall rate of return for Aquila Networks-MPS and Aquila
13 Networks-L&P.

14 Q. IS THE CURRENT CAPITAL STRUCTURE CONSISTENT WITH HOW AQUILA
15 HAS BEEN CAPITALIZED IN THE PAST?

16 A. Aquila's capital structure has been quite variable over the past few years. As can be seen
17 on Schedule MB-1, the levels of common equity and long-term debt have varied significantly
18 for the years 1998-2002. Also, the Company carried various amounts of trust preferred
19 securities during the years 1999-2001. The capital structure at the end of the test year is
20 within the bounds of this variability, containing slightly more common equity than the low
21 since 1998.

22 I would also note that I expect Aquila's capital structure to continue to vary even
23 during these proceedings, depending on the outcome of various potential asset sales and
24 attempts at debt reduction (or lack thereof).

1 Q. PLEASE SHOW THE CAPITAL STRUCTURE YOU RECOMMEND.

2 A. I recommend the following capital structure be used to calculate Aquila's overall rate of
3 return for its Missouri-jurisdictional electricity operations:

4	Common equity:	40.14%
5	Long-term debt	<u>59.86%</u>
6	Total:	100.0%
7		

8 Q. HOW DOES THIS CAPITAL STRUCTURE COMPARE WITH OTHER ELECTRIC
9 UTILITIES?

10 A. Aquila's current common equity ratio has been highly variable, in general. It is lower than
11 the average level of common equity of the comparison group I've selected for this analysis,
12 but quite similar to the common equity ratio statistics included in Value Line's Composite
13 Statistics for electric utilities (Schedule MB-4). The 24 electric utilities covered by C.A.
14 Turner Utility Reports have an average common equity ratio of 40% as of the November
15 2003 issue. This level of common equity is essentially the same as Aquila's test-year level.

16 In addition, Aquila had varying levels of outstanding trust-preferred securities in the
17 past that have now been retired. The existence of those securities affected the relative
18 percentage levels of common stock and long-term debt in Aquila's historical capital
19 structures.

20 Q. COULD YOU DEFINE THE RISK AND THE EXPLAIN THE FUNDAMENTAL
21 DIFFERENCES BETWEEN BUSINESS RISK AND FINANCIAL RISK?

22 A. Yes. Risk can be defined as the possibility that actual earnings from an asset or an
23 investment may differ from expected earnings. The wider the range of possible earnings,
24 the greater the risk associated with that asset or investment. A comparison of various risk
25 measures for EDE and the group of comparison companies is shown on Schedule MB-3.

1 **Business risk** is the uncertainty (variability) associated with earnings due to
2 fundamental business conditions faced by the company, such as cyclical markets, weather-
3 sensitive sales, changing technology, unforeseen events, or competition. Business risk is the
4 *inherent riskiness of a firm's assets* due to the operations of the company and the industry
5 in which it operates. In other words, business risk is not connected to the way the firm
6 finances its assets.

7 **Financial risk** is the uncertainty associated with earnings available to common
8 shareholders due to debt and/or preferred stock being used to finance the firm's assets.
9 This additional risk stems from the fact that cash flows to common shareholders are
10 subordinate to a firm's required debt service (i.e. a firm must pay its debt service and any
11 preferred dividends before it can pay common dividends.) From a common shareholder's
12 perspective, a firm with less debt and preferred stock in its capital structure has fewer bills
13 to pay before it can allocate earnings to common dividends, and is therefore less risky.

14
15 **EMBEDDED COSTS**

16 Q. WHAT IS THE APPROPRIATE EMBEDDED COST RATE FOR AQUILA'S LONG-
17 TERM DEBT?

18 A. The embedded cost rate is 7.48% for Aquila's long-term utility debt as of 31 December
19 2002, as provided by the Company in response to OPC data request 2002.

20 Q. DOES THIS EMBEDDED COST REFLECT THE COST OF ALL OF AQUILA'S DEBT?

21 A. No. The 7.48% embedded cost reflects the actual embedded cost of Aquila's domestic
22 utility debt only. However, this cost rate is appropriate to use in this proceeding because the
23 cost of Aquila's other debt is primarily reflective of international and unregulated operations.

1 Q. HAS AQUILA, INC. MADE ASSURANCES TO THE MPSC THAT THE COMPANY'S
2 MISSOURI-JURISDICTIONAL UTILITY CUSTOMERS WOULD PAY RATES
3 BASED ON AN INVESTMENT-GRADE COST OF DEBT, AND NO MORE?

4 A. Yes. Aquila has assured the MPSC that it would not base rates nor attempt to base rates
5 for its Missouri customers on a cost of debt that was more than that cost attainable by an
6 investment-grade public utility. Aquila's domestic utility debt was all issued before the
7 Company entered its current financial crisis. Therefore, that cost is appropriate to consider
8 for the embedded cost of debt in this proceeding.

9
10 **COST OF COMMON EQUITY**

11 Q. WHAT IS YOUR RECOMMENDED COST OF COMMON EQUITY AQUILA'S
12 REGULATED ELECTRICITY OPERATIONS, D/B/A AQUILA NETWORKS-MPS
13 AND AQUILA NETWORKS-L&P?

14 A. Aquila should be allowed a return on common equity of 9.60% to 10.10%.

15 Q. HOW DID YOU CALCULATE A FAIR RETURN ON COMMON EQUITY FOR
16 AQUILA?

17 A. I utilized the standard Discounted Cash Flow (DCF) methodology and the Capital Asset
18 Pricing Model (CAPM) applied to the common stocks of a group of four comparison
19 publicly-traded electric utilities.

20 Q. WHY DID YOU NOT INCLUDE AQUILA IN YOUR ANALYSIS?

21 A. Frankly, the current financial situation of the Company, and the correspondingly low stock
22 price, makes the Company's actual market information unsuitable to use. The Company's
23 stock is trading at low levels and the Company has suspended dividend payments.

24

1 Q. HOW DID YOU CHOOSE THE COMPARISON GROUP YOU UTILIZED FOR YOUR
2 ANALYSIS?

3 A. I started with all the electric utilities covered by C.A. Turner Utility Reports, November
4 2003. From that list, I excluded all companies that are regulated in the state of Missouri; all
5 companies that did not have at least a Standard & Poor's BBB rating; all companies that did
6 not earn at least 75% of revenues from the sale of regulated electricity; and excluded two
7 companies due to them being vastly larger than the average electric utility. From the
8 remaining companies, I excluded any company that had greater than 70% debt in its capital
9 structure and any companies that were, essentially, in as bad or worse financial shape as
10 Aquila. The following companies remained and were included in the analysis: 1) Central
11 Vermont Public Service Corporation; 2) Cleco Corporation; 3) Green Mountain Power
12 Corp.; and 4) Hawaiian Electric Industries, Inc. A comparison of financial information and
13 risk measures for the proxy group are Schedule MB-3.

14
15 **DISCOUNTED CASH FLOW MODEL**
16 **DCF COST OF EQUITY**

17 Q. WHAT IS THE DISCOUNTED CASH FLOW MODEL (DCF) COST-OF-EQUITY YOU
18 CALCULATED IN YOUR ANALYSIS?

19 A. Based on a dividend yield of 4.55% and a growth rate of 5.0%, the DCF cost of equity is
20 9.55%.

21 Q. PLEASE DESCRIBE THE STANDARD DISCOUNTED CASH FLOW (DCF) MODEL
22 YOU USED TO ARRIVE AT THE APPROPRIATE COST OF EQUITY CAPITAL.

23 A. The model is represented by the following equation:

24
$$k = D/P + g$$

1 where “k” is the cost of equity capital (i.e. investors’ required return), “D/P” is the current
2 dividend yield (dividend (D) divided by the stock price (P)) and “g” is the expected
3 sustainable growth rate.

4 If future dividends are expected to grow at a constant rate (i.e., the constant growth
5 assumption) and dividends, earnings and stock price are expected to increase in proportion to
6 each other, the sum of the current dividend yield (D/P) and the expected growth rate (g)
7 equals the required rate of return, or the cost of equity, to the firm. This form of the DCF
8 model is commonly used in the regulatory arena and is known as the constant growth, or
9 Gordon, DCF model. The constant growth DCF model is based on the following
10 assumptions:

- 11 1) A constant rate of growth,
- 12 2) The constant growth will continue for an infinite period,
- 13 3) The dividend payout ratio remains constant,
- 14 4) The discount rate must exceed the growth rate, and
- 15 5) The stock price grows proportionately to the growth rate.

16 Although all of these assumptions do not always hold in a technical sense, the relaxation of
17 these assumptions does not make the model unreliable.

18 The DCF model is based on two basic financial principals. First; the current market
19 price of any financial asset, including a share of stock, is equivalent to the value of all
20 expected future cash flows associated with that asset discounted back to the present at the
21 appropriate discount rate. The discount rate that equates anticipated future cash flows and
22 the current market price is defined as the rate of return or the company’s cost of equity
23 capital.

1 Cash flows associated with owning a share of common stock can take two forms:
2 selling the stock and dividends. Just as the current value of a share of stock is a function of
3 future cash flows (dividends), the *future* price of the stock at any time is also a function of
4 future dividends. When a share of stock is sold, what is given up is the right to receive all
5 future dividends. Therefore, the DCF model, using expected future dividends as the cash
6 flows, is appropriate regardless of how long the investor plans to hold the stock.
7 Determination of a holding period and an associated terminal price is unnecessary. Brealey
8 and Myers emphasize the irrelevance of investors' time horizons:

9 How far out could we look? In principle the horizon period H could be
10 infinitely distant. Common Stocks do not expire of old age. Barring such
11 corporate hazards as bankruptcy or acquisition, they are immortal. As H
12 approaches infinity, the present value of the terminal price ought to
13 approach zero.... We can, therefore, forget about the terminal price entirely
14 and express today's price as the present value of a perpetual stream of
15 cash dividends. (Principles of Corporate Finance, Fourth Edition, page 52).

16
17 The other basic financial principle on which the DCF is grounded is the "time value of
18 money." Investors view a dollar received today as being worth more than a dollar received
19 in the future because a dollar today can immediately be invested. Therefore, future cash
20 flows are discounted. The rate used by investors to discount future cash flows to the
21 present is the discount rate or opportunity cost of capital.

22 GROWTH RATE

23
24 Q. TO WHAT DOES THE GROWTH COMPONENT OF THE DCF FORMULA REFER?

25 A. The growth rate variable, g , in the traditional DCF model is the dividend growth rate
26 investors expect to continue into the *indefinite future* (i.e., the sustainable growth rate).
27 This is not necessarily the same growth rate that a company or analysts expect over the
28 next one year or even the next five years.

1 Q. HOW IS THE SUSTAINABLE GROWTH RATE DETERMINED?

2 A. Sustainable growth is determined by analyzing various historical and projected growth rates
3 for the Company. These growth rates might be calculated from raw data or taken from
4 financial resources such as Value Line Investment Survey. The growth rates analyzed can
5 include historical and projected growth rates of, for example, earnings per share (EPS),
6 dividends per share (DPS) and book value per share (BVPS). Analysts also consider
7 retention growth (both historical and projected), which is a calculation of the level of
8 earnings the company retains and does not pay out in dividends.

9 Q. PLEASE DESCRIBE RETENTION GROWTH IN MORE DETAIL.

10 A. It is important to recognize the fundamentals of long-term investor-expected growth when
11 developing a sustainable growth rate. Retention growth and a company's dividend policy,
12 including payout ratio, can be important when calculating a sustainable growth rate. Future
13 dividends will be generated by future earnings and a primary source of growth in future
14 earnings is the reinvestment of present earnings back into the firm (for example, investment
15 in new infrastructure components and other rate base assets). This reinvestment of
16 earnings also contributes to the growth in book value. Furthermore, it is the earned return on
17 reinvested earnings and existing capital (i.e., book value) that ultimately determines the basic
18 level of future cash flows. Therefore, as measured by retention growth, the future growth
19 rate called for in the DCF formula is found by multiplying the future expected earned return
20 on book equity (r) by the percentage of earnings expected to be retained in the business (b).
21 This calculation, known as the "b*r" method, or retention growth rate, results in a valid
22 sustainable growth rate which can be used in the Discounted Cash Flow formula. While the
23 retention growth rate can be calculated using historic data on earnings retention and equity
24 returns, this information is relevant only to the extent that it provides a meaningful basis for

1 determining the future sustainable growth rate. Consequently, *projected* data on earnings
2 retention and return on book equity are generally more representative of investors'
3 expectations.

4 Q. CAN YOU PROVIDE AN EXAMPLE THAT ILLUSTRATES THE FUNDAMENTALS
5 OF SUSTAINABLE GROWTH AS MEASURED BY RETENTION GROWTH?

6 A. Yes. To better understand the principles of retention growth, it is helpful to compare the
7 growth in a utility's cash flows to the fundamental causes of growth in an individual's
8 passbook account. For an individual who has \$100 in a passbook account paying 5.0%
9 interest, earnings will be \$5 for the first year. If this individual leaves 100% of the earnings
10 in the passbook account (retention ratio equals 100%), the account balance at the end of the
11 first year will be \$105. Total earnings in the second year will be \$5.25 ($\$105 \times 5.0\%$), and
12 the growth rate of the account in year two is 5.0% [$100\%(b) \times 5\%(r)$]. On the other hand,
13 if the individual withdraws \$3 of the earnings from the first year and reinvests only \$2
14 (retention ratio equals 40%) earnings in the second year will be only \$5.10 ($\$102 \times 5.0\%$),
15 with growth equaling 2.0% [$(\$102 - \$100) / \$100 = 2.0\% = 40\%(b) \times 5\%(r)$]. In both cases,
16 the return, along with the level of earnings retained, dictate future earnings.

17 These exact principles regarding growth apply to a utility's common stock. When
18 earnings are retained, they are available for additional investment and, as such, generate
19 future growth. When earnings are distributed in the form of dividends, they are unavailable
20 for reinvestment in those assets that would ultimately produce future growth. Either way,
21 for both a utility's common stock or an individual's passbook account, the level of earnings
22 retained, along with the rate of return, determine the level of sustainable growth.

23 Q. ARE THERE ANY OTHER FACTORS THAT INFLUENCE INVESTOR-EXPECTED
24 SUSTAINABLE GROWTH?

1 A. Yes. Stock financing will cause investors to expect additional growth if a company is
2 expected to issue new shares at a price above book value. The excess of market price over
3 book value would benefit current shareholders, increasing their per share book equity.
4 Therefore, if stock financing is expected at prices above book value, shareholders will
5 expect their book value to increase, and that adds to the growth expectation stemming from
6 earnings retention, or “b*r” growth. A more thorough explanation of “external” growth is
7 included in Appendix (I). This external growth factor has been included in all historic and
8 projected retention growth rate calculations for the group of comparison utilities.

9 Q. ARE THERE OTHER GROWTH RATE PARAMETERS THAT ARE SOMETIMES
10 USED BY ANALYSTS TO MEASURE GROWTH?

11 A. Yes. Other methods sometimes used as a proxy for determining the investor-expected
12 sustainable growth rate utilized in the DCF model include: 1) *historical* growth rates, and 2)
13 analysts’ *projections* of expected growth rates. Three commonly employed historic growth
14 parameters are: 1) earnings per share, 2) dividends per share, and 3) book value per share.
15 Additionally, analysts’ *projections* of future growth in earnings per share, dividends per
16 share, and book value per share are sometimes used as an estimate of the sustainable
17 growth rate.

18 As a matter of completeness, all of the above-mentioned techniques for measuring
19 growth were utilized: historical growth in EPS, DPS, and BVPS, historical retention growth,
20 projections of growth in EPS, DPS, and BVPS, and projected retention growth. My growth
21 rate calculations are summarized on Schedule MB-5, page 1. Calculations for individual
22 companies are shown on Schedule MB-5, pages 2-5.

23 Q. THE DCF GROWTH RATE IS THE SUSTAINABLE GROWTH RATE FOR
24 DIVIDENDS PER SHARE. IS THE HISTORIC GROWTH RATE IN DIVIDENDS PER
25 SHARE AN APPROPRIATE PROXY FOR THE SUSTAINABLE GROWTH RATE?

1 | A. Not necessarily. The historic growth rate in dividends per share will tend to overstate
2 | (understate) the sustainable growth rate when the dividend payout ratio has increased
3 | (decreased) over the measurement period. For an extended discussion and illustration of
4 | this phenomenon, please see Appendix I.

5

1 **DETERMINATION OF SUSTAINABLE GROWTH**

2 Q. WHAT GROWTH RATE PARAMETERS HAVE YOU EXAMINED?

3 A. The following growth parameters have been reviewed for EDE and the group of six
4 comparison electric utilities: 1) my calculations of historic compound growth in earnings,
5 dividends, and book value based on data from Value Line; 2) average of five-year and ten-
6 year historic growth in earnings, dividends, and book value; 3) projected growth rate in
7 earnings, dividends, and book value; 4) historic retention growth rate; and, 5) projected
8 retention growth rate.

9 Q. PLEASE EXPLAIN IN MORE DETAIL HOW THE HISTORIC GROWTH RATES OF
10 EARNINGS, DIVIDENDS, AND BOOK VALUE WERE DETERMINED.

11 A. Historic rates of growth in earnings per share (EPS), dividends per share (DPS), and book
12 value per share (BVPS) were analyzed using two methods. First, compound growth rates
13 were calculated for the five-year periods ending 2000, 2001 and 2002. These three five-
14 year compound growth rates were then averaged and are labeled "Ave. Compound Gr." on
15 line (16) of Schedule MB-5, pages 2-5.

16 The second measure of historic growth was taken from Value Line. I averaged
17 Value Line's calculated 5-year and 10-year historical growth rates when both were
18 available. If only one was available, I used that one. The historic rates of growth furnished
19 by Value Line are included in this analysis because:

20 1) The Value Line growth rates are readily available for investor use;

21 2) The Value Line rates of growth reflect both a five-year and ten-year time frame;

22 and

1 3) The Value Line rates are measured from an average of three base years to an
2 average of three ending years, smoothing the results and limiting the impact of nonrecurring
3 events.

4 Value Line historic growth measurements for EPS, DPS and BVPS appear on line
5 (19) of Schedule MB-5, pages 2-5.

6 Q. PLEASE DISCUSS YOUR ANALYSIS OF PROJECTED GROWTH RATE DATA.

7 A. Projected growth rates in EPS, DPS, and BVPS were taken from Value Line and are found
8 on line 30 of Schedule MB-5, pages 2-5. Projected growth in EPS was also taken from First
9 Call Corporation (line 32). If First Call did not issue a projection for a particular company,
10 that space contains n/a. Information from First Call is available to the average investor.
11 The projected growth in EPS found on line 36 is the average of earnings growth projections
12 furnished by Value Line and First Call. Value Line's projected growth in dividends and
13 book value are listed again on line 36.

14 Q. PLEASE DISCUSS YOUR ANALYSIS OF HISTORIC AND PROJECTED
15 RETENTION GROWTH RATES.

16 A. Historic retention growth was determined using the product of return (r) and retention rate
17 (b) for the years 1998-2002, and the average was calculated (line 10, final column). The
18 projected retention growth data, found on lines 25-27 of Schedule MB-5, pages 2-5 is based
19 on information from Value Line. Projected retention growth was calculated for 2003, 2004
20 and the period 2006-08. An average of these growth rates appears on line 30 and is used in
21 calculating projected retention growth for each company.

22 Investors' expectations regarding growth from external sources (i.e. sales of
23 additional stock at prices above book value) has been included in the determination of both
24 historic and projected growth.

1 Q. PLEASE SUMMARIZE YOUR GROWTH RATE CALCULATIONS FOR THE GROUP
2 OF COMPARISON COMPANIES.

3 A. The following table outlines the results of the analysis of growth rates for the comparison
4 group. The high average growth rate is 6.20% for projected EPS and the low average
5 growth rate is 1.10% compound historical DPS. The overall average of all growth rates for
6 all four companies is 3.77% (Schedule MB-5, page 1). The average projected growth rate
7 for the group is 4.32%. The averages do not include negative growth rates. I also excluded
8 the 19.16% Compound EPS growth rate for Central Vermont Public Service because it is an
9 extraordinary value stemming from an unusually low EPS value in 1998.

10 **Growth rate summary (proxy group): Overall average = 3.77%**

	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>
13 Historic Compound Growth	5.11%	1.10%	2.54%
14 Historic Value Line Growth	4.00%	1.75%	2.50%
15 Projected Growth	6.20%	4.00%	2.88%
	<u>Historical</u>	<u>Projected</u>	
18 Retention Growth	3.56%	4.52%	

20 Q. WHICH GROWTH RATE DO YOU CONSIDER TO BE REFLECTIVE OF THE
21 INVESTOR-EXPECTED GROWTH FOR THE COMPARISON GROUP?

22 A. I believe the sustainable growth rate for the comparison companies is at most 5.0%.

24 **DIVIDEND YIELD**

25 Q. WHAT IS THE APPROPRIATE DIVIDEND YIELD TO USE TO CALCULATE A DCF
26 COST OF EQUITY FOR AQUILA?

27 A. I utilized a dividend yield of 4.55% for my DCF cost of equity calculations. This value is the
28 average dividend yield of for the group of comparison companies. This value is supported
29 by the fact that C.A. Turner Utility Reports (November 2003) shows a dividend yield of

1 4.6% for the 24 electric utilities it covers. According to Value Line, the average dividend
2 paid by all electric utilities under its review is “slightly over 4%.”

3 Q. EXPLAIN YOUR CALCULATION OF THE DIVIDEND YIELD.

4 A. The appropriate dividend yield to use in the DCF equation is equal to the *expected* dividend
5 divided by *current* stock price. Schedule MB-6 shows average stock price over a recent
6 six week period for the comparison companies, expected dividends for 2004 (as taken from
7 Value Line) and calculations of dividend yields.

8 I used a six-week period for determining the average stock price because I believe
9 that period of time is long enough to avoid daily fluctuations and recent enough so that the
10 stock price captured is representative of current expectations. The stock price is the
11 average of the Friday closing price from 10/27/03 through 12/03/03.

12

13

CAPITAL ASSET PRICING MODEL

14 Q. PLEASE DESCRIBE THE CAPITAL ASSET PRICING MODEL YOU USED TO
15 SUBSTANTIATE YOUR RECOMMENDED RETURN ON COMMON EQUITY.

16 A. The Capital Asset Pricing Model (CAPM) is described by the following equation:

17
$$K = R_f + \text{beta}(R_m - R_f)$$

18 where,

19 K_e = the cost of common equity for the security being analyzed,

20 R_f = the risk free rate,

21 beta = the company's beta risk measure,

22 R_m = market return, and

23 $(R_m - R_f)$ = market premium.

24

25 The formula states that the cost of common equity is equal to the risk free rate of interest,
26 plus, beta multiplied by the difference between the return on the market and the risk free
27 rate (the market premium).

1 The formula says that the cost of common equity is equal to the risk free rate plus
2 some proportion of the market premium - that proportion being equal to beta. The market
3 overall has a beta of 1.0. Firms with beta less than 1.0 are assumed to be less risky than the
4 market; firms with beta greater than 1.0 are assumed to be more risky than the market.
5 Beta for my group of comparison companies ranges from 0.45 to 0.90.

6

1 Q. DO YOU SUBSCRIBE TO THE CAPM AS AN ACCURATE MEASURE OF MARKET-
2 BASED COST OF EQUITY?

3 A. I believe the CAPM and its dependence on the single risk measure beta has limitations in its
4 ability to accurately take into account the risk factors faced by a company, and therefore
5 that company's cost of equity. I do not believe the CAPM should be used as the primary
6 cost-of-capital analysis tool. However, many investors continue to rely on the CAPM.
7 Therefore, I included the CAPM as part of my analysis.

8 Q. ARE THERE ASPECTS OF THE CAPITAL ASSET PRICING MODEL ON WHICH
9 ANALYSTS TEND TO DISAGREE?

10 A. Yes. Analysts tend to disagree on all aspects of the CAPM model: the appropriate risk free
11 rate, the appropriate beta, and the appropriate return on the overall market.

12 Company witness Murry supplied two CAPM analyses in his Direct testimony
13 (Schedules DAM-15 and DAM-16) in which he utilized two different combinations of risk
14 free rate and return on the market.

15 Q. HOW DID YOU ARRIVE AT THE VALUES OF THE RISK FREE RATE AND THE
16 MARKET RETURN (OR MARKET PREMIUM) USED IN YOUR CAPM ANALYSIS?

17 A. For this proceeding, given the lack of usable market data for Aquila or either of its operating
18 divisions, I chose to calculate a total of four average CAPM costs of equity for my group of
19 four comparison companies.

20 I utilized two separate risk free rates. First, I used 4.25% for the risk free rate,
21 which is the current rate on intermediate-length U.S. Government securities as reported by
22 Value Line (12/5/03). Second, I used the 5.6% historical return on intermediate-term
23 Government bonds as reported by Ibbotson Associates.

1 Then, for each of these two risk free rates, I utilized two separate overall returns to
2 the market: 1) 12.2% market return for large company stocks, as reported by Ibbotson
3 Associates. This implied a market premium of 6.6%.

4 2) 14.55% market return, which is the average of the 12.2% return for large-
5 company stocks and the 16.9% return for small-company stocks. This implied a market
6 premium of 8.95%.

7 The result of this methodology was to provide a sweeping CAPM analysis that
8 includes and covers the areas of disagreement that usually occur between analysts.

9 Q. WHAT DOES YOUR CAPM ANALYSIS SHOW?

10 A. The results of my four CAPM analyses are as follows:

	<u>Risk free rate</u>	<u>Return to Market</u>	<u>Cost of Equity</u>
11	4.25%	12.20%	9.22%
12	4.25%	14.55%	10.69%
13	5.60%	12.20%	9.73%
14	5.60%	14.55%	11.19%
15			
16			

17 The overall average of all four calculations is 10.21%.

18
19 Q. DO YOUR CAPM RESULTS INCLUDE WHAT COULD BE CONSIDERED A
20 STATISTICAL OUTLIER?

21 A. Yes. Cleco Corporation's beta is 0.90, which is significantly higher than the other three
22 companies, and out of line for the risk of a pure-play electric utility. This fact causes the
23 overall average to be greater than it would otherwise be. The higher beta means that
24 Cleco's common stock has shown greater price volatility than the stock of the other
25 companies.

26 Q. WHAT IS THE RESULT OF YOUR CAPM ANALYSIS IF YOU EXCLUDE CLECO
27 CORPORATION?

1 A. The overall average CAPM cost of equity for the three remaining comparison companies
2 (averaging the results of all four methods) is 9.43%.

3 **RECOMMENDED RETURN ON COMMON EQUITY**

4 Q. WHAT RETURN ON COMMON EQUITY DO YOU RECOMMEND THE MPSC
5 AUTHORIZE FOR THE REGULATED ELECTRIC OPERATIONS OF AQUILA?

6 A. Based on the results of my DCF and CAPM analyses, I recommend a return on common
7 equity of 9.60% to 10.10%.

8
9 **WEIGHTED AVERAGE COST OF CAPITAL**

10 Q. WHAT OVERALL, OR WEIGHTED AVERAGE, COST OF CAPITAL IS INDICATED
11 BY YOUR ANALYSIS?

12 A. The weighted average cost of capital I calculated is 8.33% to 8.53%. The WACC
13 calculation is shown on Schedule MB-10.

14 Q. WHAT PRE-TAX COVERAGE RATIO IS IMPLIED BY YOUR
15 RECOMMENDATION?

16 A. Based on a WACC of 8.33% to 8.53%, the pre-tax coverage ratio is 2.40 to 2.47 times.
17 The derivation of pre-tax coverage is shown on Schedule MB-10.

18 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

19 A. Yes, it does.
20

APPENDIX A

DEVELOPMENT & PURPOSES OF REGULATION

1
2
3 Q. WHY ARE PUBLIC UTILITIES REGULATED?

4 A. *The nature of public utility services generally requires a monopolistic mode of operation.*
5 Only a limited number of companies (and quite often only one) are normally allowed to
6 provide a particular utility service in a specific geographic area. Public utilities are often
7 referred to as "natural" monopolies; a state created by such powerful economies of scale or
8 scope that only one firm can or should provide a given service. Even when a utility is not a
9 pure monopoly, it still has substantial market power over at least some of its customers.

10 In order to secure the benefits arising from monopolistic -type operations, utilities are
11 generally awarded an exclusive franchise (or certificate of public convenience) by the
12 appropriate governmental body. Since an exclusive franchise generally protects a firm from
13 the effects of competition, it is critical that governmental control over the rates and services
14 provided by public utilities is exercised. Consequently, a primary objective of utility
15 regulation is to produce market results that closely approximate the conditions that would be
16 obtained if utility rates were determined competitively. Based on this competitive standard,
17 utility regulation must: 1) secure safe and adequate service; 2) establish rates sufficient to
18 provide a utility with the opportunity to cover all reasonable costs, including a fair rate of
19 return on the capital employed; and 3) restrict monopoly-type profits.

1
2 **APPENDIX B**
CALCULATION OF THE WEIGHTED AVERAGE COST OF CAPITAL

3 Q. PLEASE EXPLAIN HOW THE WEIGHTED AVERAGE COST OF CAPITAL IS USED
4 IN TRADITIONAL RATEMAKING AND HOW IT IS DERIVED.

5 A. The basic standard of rate regulation is the revenue-requirement standard, often referred to
6 as the rate base-rate of return standard. Simply stated, a regulated firm must be permitted to
7 set rates that will cover operating costs and provide an opportunity to earn a reasonable rate
8 of return on assets devoted to the business. A utility's total revenue requirement can be
9 expressed as the following formula:

10
$$R = O + (V - D + A)r$$

11 where R = the total revenue required,

12 O = cost of operations,

13 V = the gross value of the property,

14 D = the accrued depreciation, and

15 A = other rate base items,

16 r = the allowed rate of return/weighted average cost of capital.

17 This formula indicates that the process of determining the total revenue requirement for a
18 public utility involves three major steps. First, allowable operating costs must be ascertained.
19 Second, the net depreciated value of the tangible and intangible property, or net investment
20 in property, of the enterprise must be determined. This net value, or investment (V - D),
21 along with other allowable items is referred to as the rate base. Finally, a "fair rate of
22 return" or weighted average cost of capital (WACC) must be determined. This rate,
23 expressed as a percentage, is multiplied by the rate base. The weighted average cost of
24 capital (WACC) is applied to the rate base (V-D+A) since it is generally recognized the rate

1 base is financed with the capital structure and these two items are normally similar in size.

2 The allowed rate of return, or WACC, is typically defined as follows:

3
$$r = i(D/C) + l(P/C) + k(E/C)$$

4 where i = embedded cost of debt capital,

5 D = amount of debt capital,

6 l = embedded cost of preferred stock,

7 P = amount of preferred stock,

8 k = cost of equity capital,

9 E = amount of equity capital, and

10 C = amount of total capital.

11 This formula indicates that the process of determining WACC involves separate
12 determinations for each type of capital utilized by a utility. Under the weighted cost
13 approach, a utility company's total invested capital is expressed as 100 percent and is divided
14 into percentages that represent the capital secured by the issuance of long-term debt,
15 preferred stock, common stock, and sometimes short-term debt. This division of total capital
16 by reference to its major sources permits the analyst to compute separately the cost of both
17 debt and equity capital. The cost rate of each component is weighted by the appropriate
18 percentage that it bears to the overall capitalization. The sum of the weighted cost rates is
19 equal to the overall or weighted average cost of capital and is used as the basis for the fair
20 rate of return that is ultimately applied to rate base.
21

1
2 **APPENDIX C**
ECONOMIC PRINCIPLES OF REGULATION

3 Q. BRIEFLY DESCRIBE THE ECONOMIC RATIONALE FOR RATE BASE-RATE OF
4 RETURN REGULATION.

5 A. Rate base-rate of return regulation is based, in part, on basic economic and financial theory
6 that applies to both regulated and unregulated firms.

7 Although it is well recognized that no form of economic regulation can ever
8 be a perfect substitution for competition in determining market prices for
9 goods and services, there is nearly unanimous acceptance of the principle
10 that regulation should act as a substitute for competition in utility markets.
11 (Parcell, The Cost of Capital Manual p.1-4).

12
13 It is the interaction of competitive markets forces that holds the prices an unregulated firm
14 can charge for its products or services in line with the actual costs of production. In fact,
15 competition between companies is generally viewed as the mechanism that allows
16 consumers to not only purchase goods and services at prices consistent with the costs of
17 production but also allows consumers to receive the highest quality product. Since regulated
18 utilities are franchised monopolies generally immune to competitive market forces, a primary
19 objective of utility regulation is to produce results that closely approximate the conditions that
20 would exist if utility rates were determined in a competitive atmosphere.

21 Under basic financial theory, it is generally assumed the goal for all firms is the
22 maximization of shareholder wealth. Additionally, capital budgeting theory indicates that, in
23 order to achieve this goal, an unregulated firm should invest in any project which, given a
24 certain level of risk, is expected to earn a rate of return at or above its weighted average
25 cost of capital.

26 Competition, in conjunction with the wealth maximization goal, induces firms to
27 increase investment as long as the expected rate of return on an investment is greater than
28 the cost of capital. Competitive equilibrium is achieved when the rate of return on the last

1 investment project undertaken just equals the cost of capital. When competitive equilibrium
2 is achieved, the price ultimately received for goods or services reflects the full costs of
3 production. Therefore, not only does competition automatically drive unregulated firms to
4 minimize their capital costs (investment opportunities are expanded and competitive position
5 is enhanced when capital costs can be lowered), it also ensures that the marginal return on
6 investment just equals the cost of capital.

7 Given that regulation is intended to emulate competition and that, under competition,
8 the marginal return on investment should equal the cost of capital, it is crucial for regulators
9 to set the authorized rate of return equal to the actual cost. If this is accomplished, the
10 *marginal return on prudent and necessary investment just equals cost and the forces of*
11 *competition are effectively emulated.*

12

1
2 **APPENDIX D**
LEGAL REQUIREMENT FOR A FAIR RATE OF RETURN

3 Q. IS THERE A JUDICIAL REQUIREMENT RELATED TO THE DETERMINATION OF
4 THE APPROPRIATE RATE OF RETURN FOR A REGULATED UTILITY?

5 A. Yes. The criteria established by the U.S. Supreme Court closely parallels economic thinking
6 on the determination of an appropriate rate of return under the cost of service approach to
7 regulation. The judicial background to the regulatory process is largely contained in two
8 seminal decisions handed down in 1923 and 1944. These decisions are,

9 Bluefield Water Works and Improvement
10 Company v. Public Service Commission,
11 262 U.S. 679 (1923), and
12

13 FPC v. Hope Natural Gas Co., 320 U.S., 591 (1944)

14 In the Bluefield Case, the Court states,

15
16 A public utility is entitled to such rates as will permit it to earn a return on
17 the value of the property which it employs for the convenience of the public
18 equal to that generally being made at the same time and in the same general
19 part of the country on investments in other business undertakings which are
20 attended by corresponding risks and uncertainties; but has no constitutional
21 right to profits such as are realized or anticipated in highly profitable
22 enterprises or speculative ventures. The return should be reasonably
23 sufficient to assure confidence in the financial soundness of the utility, and
24 should be adequate, under efficient and economical management, to
25 maintain and support its credit and enable it to raise the money necessary
26 for the proper discharge of its public duties. A rate of return may be
27 reasonable at one time, and become too high or too low by changes
28 affecting opportunities for investment, the money market, and business
29 conditions generally.
30

31 Together, Hope and Bluefield have established the following standards,

32 1). A utility is entitled to a return similar to that available to other enterprises with
33 similar risks;

34 2). A utility is entitled to a return level reasonably sufficient to assure financial
35 soundness and support existing credit, as well as raise new capital; and

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3). A fair return can change along with economic conditions and capital markets.
Furthermore, in Hope, the Court makes clear that regulation does not guarantee utility profits
and, in Permian Basin Area Rate Cases, 390 US 747 (1968), that, while investor interests
(profitability) are certainly pertinent to setting adequate utility rates, those interests do not
exhaust the relevant considerations.

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**APPENDIX E
REGULATION IN MISSOURI**

Q. WHAT IS THE ORIGIN AND RATIONALE FOR THE REGULATION OF PUBLIC UTILITIES IN THE STATE OF MISSOURI?

A. All investor owned public utilities operating in the state of Missouri are subject to the Public Service Commission Act, as amended. The Public Service Commission Act was initially passed by the Forty-Seventh General Assembly on April 15, 1913. (Laws of 1913 pp. 557-651, inclusive).

In State ex rel Kansas City v. Kansas City Gas Co. 163 S.W. 854 (Mo.1914), the case of first impression pertaining to the Public Service Commission Act, the Missouri Supreme Court described the rationale for the regulation of public utilities in Missouri as follows:

That act (Public Service Commission Act) is an elaborate law bottomed on the police power. It evidences a public policy hammered out on the anvil of public discussion. It apparently recognizes certain generally accepted economic principles and conditions, to wit: That a public utility (like gas, water, car service, etc.) is in its nature a monopoly; that competition is inadequate to protect the public, and, if it exists, is likely to become an economic waste; that regulation takes the place of and stands for competition; that such regulation to command respect from patron or utility owner, must be in the name of the overlord, the state, and, to be effective, must possess the power of intelligent visitation and the plenary supervision of every business feature to be finally (however invisible) reflected in rates and quality of service. (Kansas City Gas Co. at 857-58).

The General Assembly has determined that the provisions of the Public Service Commission Act "shall be liberally construed with a view to the public welfare, efficient facilities and substantial justice between patrons and public utilities" (See: 386.610 RSMo 1994). Pursuant to the above legislative directive, when developing the cost of equity capital for a public utility operating in Missouri, it is appropriate to do so with a view toward the public welfare;

1 giving the utility an amount that will allow for efficient use of its facilities and the proper
2 balance of interests between the ratepayers and the utility.

3 **APPENDIX F**
4 **MARKET-TO-BOOK RATIO ILLUSTRATION**

5 Q. COULD YOU PROVIDE AN EXAMPLE ILLUSTRATING THE IMPORTANCE OF
6 MARKET-TO-BOOK RATIOS AND THEIR RELATIONSHIP TO THE COST OF
7 EQUITY CAPITAL?

8 A. Yes. Assume that a utility's equity has a book value of \$10 per share and that, for simplicity,
9 this utility pays out all its earnings in dividends. If regulators allow the utility a 12% return,
10 investors will expect the company to earn (and pay out) \$1.20 per share. If investors
11 require a 12% return on this investment, they will be willing to provide a market price of \$10
12 per share for this stock ($\$1.20 \text{ dividends} / \$10 \text{ market price} = 12\%$). In that case, the
13 allowed/expected return is equal to the cost of capital and the market price is equal to the
14 book value.

15 *Now, assume the investors' required return is 10%. Investors would be drawn to a*
16 *utility stock in a risk class for which they require a 10% return but was expected to pay out*
17 *a 12% return. The increased demand by investors would result in an increase in the market*
18 *price of the stock until the total share yield equaled the investors' required return. In our*
19 *example, that point would be \$12 per share ($\$1.20 \text{ dividends} / \$12 \text{ market price} = 10\%$). As*
20 *such, the allowed/expected return (12%) is greater than the required return (10%) and the*
21 *per share market price (\$12/share) exceeds book value (\$10/share), producing a market-to-*
22 *book ratio greater than one ($\$12 / \$10 = 1.20$). Consequently, when the market-to-book ratio*
23 *for a given utility is greater than one, the earned or projected return on book equity is greater*
24 *than the cost of capital.*

25

APPENDIX G

EFFICIENT NATURE OF THE CAPITAL MARKETS

1
2
3 Q. IS THE DISCOUNTED CASH FLOW MODEL INHERENTLY CAPABLE OF
4 ADJUSTING FOR THE LEVEL OF REAL OR PERCEIVED RISKINESS TO A GIVEN
5 SECURITY?

6 A. Yes. It is impossible for any one analyst to systematically interpret the impact that each and
7 every risk variable facing an individual firm has on the cost of equity capital to that firm.
8 Fortunately, this type of risk-by-risk analysis is not necessary when determining the
9 appropriate variables to be plugged into the DCF formula.

10 As stated earlier, the DCF model can correctly identify the cost of equity capital to
11 a firm by adding the current dividend yield (D/P) to the correct determination of investor-
12 expected growth (g). Thus, the difficult task of determining the cost of equity capital is
13 made easier, in part, by the relative ease of locating dividend and stock price information and
14 the efficient nature of the capital markets.

15 Q. PLEASE EXPLAIN THAT STATEMENT.

16 A. The DCF model is based on the assumption that investors (1) calculate intrinsic values for
17 stocks on the basis of their interpretation of available information concerning future cash
18 flows and risk, (2) compare the calculated intrinsic value for each stock with its current
19 market price, and (3) make buy or sell decisions based on whether a stock's intrinsic value is
20 greater or less than its market price.

21 Only if its market price is equal to or lower than its intrinsic value as calculated by
22 the marginal investor will a stock be demanded by that investor. If a stock sells at a price
23 significantly above or below its calculated intrinsic value, buy or sell orders will quickly push
24 the stock towards market equilibrium. The DCF model takes on the following form when
25 used by investors to calculate the intrinsic value of a given security,

1 $P = D/k-g$

2 where $P =$ the intrinsic value of the security,

3 $D =$ the current dividend,

4 $g =$ the expected growth rate, and

5 $k =$ the required return on the security

6 Since the required rate of return for any given investor is based on both the perceived
7 riskiness of the security and return opportunities available in other segments of the market, it
8 can be easily demonstrated that when perceived riskiness is increased, the investors'
9 required return is also increased and the market value of the investment falls as it is valued
10 less by the marginal investor. Returning to the form of the DCF model used to determine
11 the cost of equity capital to the firm,

12 $k = D/P + g$

13 we see that the required return rises as an increase in the perceived risk associated with a
14 given security drives the price down. Within this context, the DCF formula incorporates all
15 known information, including information regarding risks, into the cost of equity capital
16 calculation. This is known as the "efficient market" hypothesis.

17 Q. IS THE "EFFICIENT MARKET" HYPOTHESIS SUPPORTED IN THE FINANCIAL
18 LITERATURE?

19 A. Yes. Modern investment theory maintains that the U.S. capital markets are efficient and, at
20 any point in time, the prices of publicly traded stocks and bonds reflect all available
21 information about those securities. Additionally, as new information is discovered, security
22 prices adjust virtually instantaneously. This implies that, at any given time, security prices
23 reflect "real" or intrinsic values. This point is further clarified in Investments, by Bodie,
24 Kane, and Marcus. According to Bodie, et.al.,

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A large body of empirical evidence supports a theory called the **efficient markets hypothesis** (EMH), which among other things says that active management of both types should not be expected to work for very long. The basic reasoning behind the EMH is that in a competitive financial environment successful trading strategies tend to “self-destruct.” Bargains may exist for brief periods, but with so many talented highly paid analysts scouring the markets for them, by the time you or I “discover” them, they are no longer bargains. (pg. 3-4)

According to Brealy and Myers;

In an efficient market you can trust prices. They impound all available information about the value of each security. (Principles of Corporate Finance, Fourth Edition, page 300)

APPENDIX H

**DETERMINATION OF RETENTION GROWTH &
SUSTAINABLE GROWTH vs. EARNINGS AND DIVIDEND GROWTH RATES**

Q. PREVIOUSLY YOU STATED THAT IT IS CRITICAL TO UNDERSTAND THE SOURCES OF GROWTH WHEN DEVELOPING A SUSTAINABLE GROWTH RATE RECOMMENDATION. PLEASE PROVIDE AN EXAMPLE THAT ILLUSTRATES HOW SUSTAINABLE GROWTH IS MEASURED USING THE RETENTION GROWTH METHOD.

A. To understand how investors develop a growth rate expectation, it is helpful to look at an illustration that shows how expected growth is measured. To do this, assume that a hypothetical utility has a first period common equity, or book value per share of \$20.00; the investor-expected return on that equity is 12 percent; and the stated company policy is to pay out 50 percent of earnings in dividends. The first period earnings per share are expected to be \$2.40 (\$20 per share book equity x 12% equity) and the expected dividend is \$1.20. The amount of earnings not paid out to shareholders (\$1.20), referred to as retained earnings, raises the book value of the equity to \$21.20 in the second period. The following table continues the hypothetical for a three-year period and illustrates the underlying determinants of growth.

	<u>Year 1</u>	<u>Year 2</u>	<u>Year 3</u>	<u>Gr.</u>
Book Value	\$20.00	\$21.20	\$22.47	6.00%
Equity Return	12%	12%	12%	
Earnings/Sh.	\$2.40	\$2.54	\$2.67	6.00%
Payout Ratio	50%	50%	50%	
Dividend/Sh.	\$1.20	\$1.27	\$1.34	6.00%

As can be seen, earnings, dividends, and book value all grow at the same rate when the payout ratio and return on equity remain stable. Moreover, key to this growth is the amount of earnings retained or reinvested in the firm and the return on equity.

1 Letting "b" equal the retention ratio of the firm (or 1 minus the payout ratio) and
2 letting "r" equal the firm's expected return on equity, the DCF growth rate "g" (also referred
3 to as the sustainable growth rate) is equal to their product, or

4
$$g = br.$$

5 As shown in the example, the growth rate for the hypothetical company is 6.00 percent
6 (12% ROE x 50% payout ratio).

7 Dr. Gordon has determined that this equation embodies the underlying fundamentals
8 of growth and, therefore, is a primary measure of growth to be used in the DCF model
9 (Gordon, The Cost of Capital to a Public Utility, 1974, p.81). It should be noted, however,
10 Dr. Gordon's research also indicates that analysts' growth rate projections are useful in
11 estimating investors' expectations. As a result, analysts' published growth rate projections,
12 along with other historic and projected growth rates, are considered in this analysis for the
13 purpose of reaching an accurate estimation of the expected sustainable growth rate.

14 Q. CAN THE RETENTION GROWTH RATE MODEL BE FURTHER REFINED IN
15 ORDER TO BEST REPRESENT INVESTORS' EXPECTATIONS?

16 A. Yes. The above hypothetical example does not allow for the existence of external sources
17 of equity financing (i.e., sales of common stock). Stock financing will cause investors to
18 expect additional growth if the company is expected to issue additional shares at a market
19 price that exceeds book value.

20 The excess of market value over book value per share would benefit current
21 shareholders by increasing their per share equity value. Therefore, if the company is
22 expected to continue to issue stock at a price that exceeds book value per share, the
23 shareholders would continue to expect their book value to increase and would add that
24 growth expectation to that stemming from the retention of earnings, or internal growth.

1 On the other hand, if a company is expected to issue new common equity at a price
2 below book value, that would have a negative effect on shareholders' current growth rate
3 expectations. Finally, with little or no expected equity financing or a market-to-book ratio at
4 or near one, investors would expect the long-term sustainable growth rate for the company
5 to equal the growth from earnings retention.

6 Dr. Gordon identifies the growth rate which includes both expected internal and
7 external financing as,

8 $g = br + sv$

9 where, g = DCF expected growth rate,

10 r = return on equity,

11 b = retention ratio,

12 v = fraction of new common stock sold that accrues to the current shareholder,

13 s = funds raised from the sale of stock as a fraction of existing equity.

14 Additionally,

15 $v = 1 - BV/MP$

16 where,

17 MP = market price,

18 BV = book value.

19
20 The second term (sv), which represents the external portion of the expected growth rate,
21 does not normally represent a major source of growth when compared to the expected
22 growth attributed to the retention of earnings. For example, the FERC Generic Rate of
23 Return Model estimates the (sv) component in the range of 0.1% to 0.2%. However, I have
24 used this equation as the basis for determining sustainable growth for the comparison group.

25 Q. IS HISTORIC OR PROJECTED GROWTH IN EARNINGS OR DIVIDENDS
26 APPROPRIATE FOR DETERMINING THE DCF GROWTH RATE?

1 A. No, not always. As I have stated, growth derived from earnings or dividends alone can be
2 unreliable for ratemaking purposes due to external influences on these parameters such as
3 changes in the historic or expected rate of return on common equity or changes in the
4 payout ratio. An extended example will demonstrate this point.

5 If we take the example above and assume that, in year two, the expected return on
6 equity rises from 12 percent to 15 percent, the resulting growth rate in earnings and
7 dividends per share dramatically exceeds what the company could sustain indefinitely. The
8 error that can result from exclusive reliance on earnings or dividends growth is illustrated in
9 the following table:

	<u>Year 1</u>	<u>Year 2</u>	<u>Year 3</u>	<u>Gr.</u>
10 Book Value	\$20.00	\$21.20	\$22.79	6.75%
11 Equity Return	12%	15%	15%	
12 Earnings/Sh.	\$2.40	\$3.18	\$3.42	19.37%
13 Payout Ratio	50%	50%	50%	
14 Dividends/Sh.	\$1.20	\$1.59	\$1.71	19.37%

15
16
17 Due to the change in return on equity in year two, the compound growth rate for dividends
18 and earnings is greater than 19 percent, which is the result only of a short-term increase in
19 the equity return rather than the intrinsic ability of the firm to grow continuously at a 19
20 percent annual rate.

21 For year one, the sustainable rate of growth ($g=br$) is 6.00 percent, just as it was in
22 the previous example. On the other hand, in years two and three, the sustainable growth
23 rate increases to 7.50 percent. ($15\% \text{ ROE} \times 50\% \text{ retention rate} = 7.50\%$). Consequently, if
24 the utility is expected to continually earn a 15 percent return on equity and retain 50 percent
25 of earnings for reinvestment, a growth rate of 7.50 percent would be a reasonable estimate
26 of the long-term sustainable growth rate. However, the compound growth rate in earnings
27 and dividends, which is over 19 percent, dramatically exceeds the actual investor-expected
28 growth rate.

1 As can be seen in the hypothetical, the 19 percent growth rate is simply the result of
2 the change in return on equity from year one to year two, not the firm's ability to grow
3 sustainably at that rate. Consequently, this type of growth rate cannot be relied upon to
4 accurately measure investors' sustainable growth rate expectations. In this instance, to rely
5 on either earnings or dividend growth would be to assume the return on equity could
6 continue to increase indefinitely. This, of course, is a faulty assumption; the recognition of
7 which emphasizes the need to analyze the fundamentals of actual growth.

8 Q. IS HISTORIC GROWTH IN DIVIDENDS AN ACCURATE INDICATOR OF
9 INVESTORS' GROWTH EXPECTATIONS WHEN THE HISTORICAL PAYOUT
10 RATIO HAS BEEN ERRATIC OR TRENDED DOWNWARD OVER TIME?

11 A. As stated, no. It can also be demonstrated that a change in our hypothetical utility's payout
12 ratio makes the past rate of growth in dividends an unreliable basis for predicting investor-
13 expected growth. If we assume the hypothetical utility consistently earns its expected equity
14 return but in the second year changes its payout ratio from 50 percent to 75 percent, the
15 resulting growth rate in dividends far exceeds a reasonable level of sustainable growth.

	<u>Year 1</u>	<u>Year 2</u>	<u>Year 3</u>	<u>Gr.</u>
16 Book Value	\$20.00	\$21.20	\$21.84	4.50%
17 Equity Return	12%	12%	12%	
18 Earnings/Sh.	\$2.40	\$2.54	\$2.62	4.50%
19 Payout Ratio	50%	75%	75%	
20 Dividends/Sh.	\$1.20	\$1.91	\$1.97	28.13%

21 Although the company has registered a high dividend growth rate (28.13%), it is not
22 representative of the growth that could be sustained, as called for in the DCF model. In
23 actuality, the sustainable growth rate (br) has declined due to the increased payout ratio. To
24 utilize a 28 percent growth rate in a DCF analysis for this hypothetical utility would be to
25 assume that the payout ratio could continue to increase indefinitely and lead to the unlikely
26 result that the firm could consistently pay out more in dividends than it earns. The problems
27
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1 associated with sole reliance on historic dividend growth has been recognized in the financial
2 literature. According to Brigham and Gapenski,

3
4 If earnings and dividends are growing at the same rate, there is no problem,
5 but if these two growth rates are unequal, we do have a problem. First, the
6 DCF model calls for the expected dividend growth rate. However, if EPS
7 and DPS are growing at different rates, something is going to have to
8 change: these two series cannot grow at two different rates indefinitely
9 (Intermediate Financial Management, p.145).

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**DIRECT TESTIMONY
OF
MARK BURDETTE

AQUILA, INC. D/B/A
AQUILA NETWORKS MPS AND AQUILA NETWORKS L&P
CASE NO. ER-2004-0034**

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Aquila Networks - MPS & SJLP

Common Equity Ratios

For OPC Witness Burdette's Comparable Companies

Company Name	Common Equity
Central Vermont Public Service	54.10%
Cleco Corporation	38.20%
Green Mountain Power	48.30%
Hawaiian Electric Industries, Inc.	46.50%
Comparable Companies' Averages	46.78%
Witness Burdette's Proposed Equity Ratio	40.14%

Source: Direct Testimony of OPC Witness Mark Burdette, Schedule MB-4

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ER-2004-0034 Aquila, Inc.

Aquila, Inc. Historical Capital Structure

	<u>2002</u>	<u>2001</u>	<u>2000</u>	<u>1999</u>	<u>1998</u>	<u>Average</u>
Common Equity	40.1%	56.1%	39.2%	37.4%	51.2%	46.0%
Preferred Trust Securities	0.0%	5.5%	9.8%	8.6%	0.0%	6.0%
Long Term Debt	<u>59.9%</u>	<u>38.4%</u>	<u>51.0%</u>	<u>54.0%</u>	<u>48.8%</u>	<u>48.1%</u>
	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Financial Ratios

	<u>2002</u>	<u>2001</u>	<u>2000</u>	<u>1999</u>	<u>1998</u>	<u>Average</u>
EPS (\$12.83)	\$2.42	\$2.21	\$1.75	\$1.63	\$1.86	\$1.86
DPS	\$1.20	\$1.20	\$1.20	\$1.20	\$1.20	\$1.20
Payout	49.6%	54.3%	68.6%	73.6%	64.4%	64.4%
Return on average common equity	11.70%	13.46%	10.80%	11.43%	11.90%	11.90%

Source: Aquila, Inc. Annual Reports
 Value Line Investment Survey

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Capital Structure as of 31 December 2002

	<u>Amount</u>	<u>Percent</u>
Common Stock Equity \$	1,607.9	40.14%
Trust Preferred Securities \$	-	
Long Term Debt \$	2,398.0	59.86%
\$	<u>4,006</u>	<u>100.00%</u>

Source: Company response to OPC DR2001 and 2002;

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Risk Measures

		(millions)	% Rev	Missouri
	Public	Revenue	Elec	S&P Regulation?
Central Vermont Public Service	Yes	\$ 310.2	100.0%	BBB+ No
Cleco Corporation	Yes	\$ 803.8	77.0%	BBB+ No
Green Mountain Power	Yes	\$ 278.0	100.0%	BBB No
Hawaiian Electric Industries	Yes	\$ 1,740.7	78.0%	BBB+ No
Average		\$ 783.2	88.8%	BBB+

	Beta	Payout Ratio	Common Equity	Safety	MTB	Interest Coverage	Fixed Charge Coverage	Financial Strength
Central Vermont Public Service	0.45	54.0%	54.1%	3	1.37	4.1	251%	B++
Cleco Corporation	0.90	-	38.2%	3	1.55	3.1	226%	B+
Green Mountain Power	0.60	36.0%	48.3%	3	1.18	3.5	327%	B++
Hawaiian Electric Industries	0.55	84.0%	46.5%	2	1.53	3.0	289%	A
Average	0.63	58.0%	46.8%	2.75	1.41	3.43	273%	B++

Source: C.A. Turner Utility Reports
 Source: Value Line Investment Survey

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Comparable Companies' Percent Common Equity
Value Line Investment Survey Composite Index

	<u>2002</u>	<u>2001</u>	<u>2000</u>	<u>1999</u>	<u>Average</u>
Central Vermont Public Service	54.1%	48.4%	50.0%	48.5%	50.3%
Cleco Corporation	38.2%	42.4%	39.7%	41.0%	40.3%
Green Mountain Power	48.3%	52.2%	50.3%	49.8%	50.2%
Hawaiian Electric Industries	<u>46.5%</u>	<u>41.6%</u>	<u>39.9%</u>	<u>41.4%</u>	42.4%
Average	46.8%	46.2%	45.0%	45.2%	45.8%
Aquila, Inc.	40.1%	56.1%	39.2%	37.4%	46.1%

	<u>2002</u>	<u>2001</u>	<u>2000</u>	<u>1999</u>	<u>Average</u>
Value Line Composite Index	39.0%	38.9%	40.3%	42.1%	40.4%
<i>(Electric Utility Industry)</i>					

Note: Calculations do not include short term debt

Source: Value Line Investment Survey

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Summary - Discounted Cash Flow Growth

Historical Growth	COMPANY	In + EV	Compound Growth			Value Line		
			EPS	DPS	BVPS	EPS	DPS	BVPS
	Central Vermont Public Service	1.02%	79.16%	0.38%	0.82%	-3.00%	-2.00%	1.00%
	Cleco Corporation	5.37%	7.75%	2.54%	5.55%	5.50%	2.75%	5.00%
	Green Mountain Power	5.06%	4.61%	-21.00%	-4.75%	-	-	-
	Hawaiian Electric Industries	2.78%	2.99%	0.38%	1.15%	2.50%	0.75%	1.50%
	Average	3.56%	5.11%	1.10%	2.54%	4.00%	1.75%	2.50%

Projected Growth	COMPANY	In + EV	Value Line/First Call		
			BPS	DPS	BVPS
	Central Vermont Public Service	4.67%	7.50%	3.00%	2.00%
	Cleco Corporation	5.61%	5.00%	0.50%	3.00%
	Green Mountain Power	6.01%	9.50%	8.50%	3.00%
	Hawaiian Electric Industries	1.79%	2.80%	-	3.50%
	Average	4.52%	6.20%	4.00%	2.88%

Ranges	COMPANY	Overall	HG/Low			Average	Average	
		Average	High	Low*	Average	Median	Historical	Projected
	Central Vermont Public Service	2.55%	7.50%	1.00%	4.25%	1.02%	0.81%	4.29%
	Cleco Corporation	4.42%	7.75%	0.50%	4.13%	5.00%	4.94%	3.53%
	Green Mountain Power	6.11%	9.50%	3.00%	6.25%	4.83%	4.83%	6.75%
	Hawaiian Electric Industries	2.01%	3.50%	0.38%	1.94%	2.14%	1.72%	2.70%
	Average	3.77%	7.06%	1.22%	4.14%	3.25%	3.07%	4.32%

Negative growth rates are not included in averages nor in the determination of "Low."

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Discounted Cash Flow Growth Parameters
Central Vermont Public Service Corporation

<u>Historical Growth</u>					<u>Retention Growth</u>		
<u>Compound Growth</u>					<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
	<u>Historical Data</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Ratio (b)</u>	<u>Return (r)</u>	<u>(b*r)</u>
1	1996	1.41	0.84	16.19	0.404		
2	1997	1.32	0.88	16.38	0.333		
3	1998	0.18	0.88	15.63	-3.889	1.10%	-4.28%
4	1999	1.28	0.88	16.05	0.313	8.00%	2.50%
5	2000	1.14	0.88	16.57	0.228	6.90%	1.57%
6	2001	0.93	0.88	15.81	0.054	5.80%	0.31%
7	2002	1.54	0.88	16.83	0.429	9.30%	3.99%
8							
9		<u>Compound Growth Rates</u>				<u>Ave. Internal</u>	
10	96-2000	-5.18%	1.17%	0.58%		<u>Growth (br):</u>	0.82%
11							
12	97-2001	-8.38%	0.00%	-0.88%		<u>ADD: External</u>	
13						<u>Growth (sv):</u>	0.20%
14	98-2002	71.03%	0.00%	1.87%			
15						<u>Historic</u>	
16	<u>Ave. Compound Gr.</u>	<u>19.16%</u>	<u>0.39%</u>	<u>0.82%</u>		<u>"br + sv" Gr.</u>	<u>1.02%</u>
17							
18	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>			
19	Historical Gr.	-3.00%	-2.00%	1.00%			
20	(Avg of 5 and 10 yr. if both are available)						
21							
22		<u>Projected Growth</u>					
23		<u>Retention Growth Calculation</u>					
24	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
25	2003	\$1.50	\$0.88	\$17.10	Ratio (b)	Return (r)	(b*r)
26	2004	1.55	0.92	17.35	0.413	8.50%	3.51%
27	2006-08 est'd	1.85	1.04	18.20	0.406	9.00%	3.66%
28					0.438	10.50%	4.60%
29							
30	<u>Anabast's Estimates</u>					<u>Projected</u>	
31	Value Line	7.50%	3.00%	2.00%		<u>Growth (br):</u>	3.92%
32							
33	First Call	n/a				<u>ADD: External</u>	
34						<u>Growth (sv):</u>	0.07%
35							
36	<u>Average</u>					<u>Projected</u>	
	<u>Proj'd Growth</u>	<u>7.50%</u>	<u>3.00%</u>	<u>2.00%</u>		<u>"br + sv" Gr.</u>	<u>4.67%</u>

SOURCE: The Value Line Investment Survey; C.A. Turner Utility Reports;
 First Call Corporation

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BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

Discounted Cash Flow Growth Parameters
Cleco Corporation

<u>Historical Growth</u>					<u>Retention Growth</u>		
<u>Compound Growth</u>					<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
	<u>Historical Data</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Ratio (b)</u>	<u>Return (r)</u>	<u>(b*r)</u>
1	1996	1.12	0.77	8.30	0.313		
2	1997	1.09	0.79	8.68	0.275		
3	1998	1.12	0.81	9.07	0.277	12.70%	3.52%
4	1999	1.19	0.83	9.44	0.303	12.90%	3.90%
5	2000	1.46	0.85	10.04	0.418	14.90%	6.23%
6	2001	1.51	0.87	10.69	0.424	14.60%	6.19%
7	2002	1.52	0.90	11.77	0.408	13.10%	5.34%
8							
9		<u>Compound Growth Rates</u>				<u>Ave. Internal</u>	
10	'96-2000	6.85%	2.50%	4.87%		<u>Growth (br):</u>	5.04%
11							
12	'97-2001	8.49%	2.44%	5.35%		<u>ADD: External</u>	
13						<u>Growth (sv):</u>	0.34%
14	'98-2002	7.91%	2.67%	6.73%			
15						<u>Historic</u>	
16	<u>Ave. Compound Gr.</u>	<u>7.75%</u>	<u>2.54%</u>	<u>5.65%</u>		<u>"br + sv" Gr.</u>	<u>5.37%</u>
17							
18	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>			
19	<u>Historical Gr.</u>	<u>5.50%</u>	<u>2.75%</u>	<u>5.00%</u>			
20	(Avg of 5 and 10 yr. if both are available)						
21							
22	<u>Projected Growth</u>						
23	<u>Retention Growth Calculation</u>						
24	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
25	2003	\$1.30	\$0.90	\$10.40	Ratio (b)	Return (r)	(b*r)
26	2004	1.40	0.90	10.90	0.308	12.50%	3.85%
27	2006-08 est'd	1.50	0.90	12.75	0.357	13.00%	4.64%
28					0.400	13.50%	5.40%
29	<u>Analyst's Estimates</u>						<u>Projected</u>
30	<u>Value Line</u>		0.50%	3.00%		<u>Growth (br):</u>	4.63%
31							
32	<u>First Call</u>	5.00%				<u>ADD: External</u>	
33						<u>Growth (sv):</u>	0.21%
34							
35	<u>Average</u>					<u>Projected</u>	
36	<u>Proj'd Growth</u>	<u>5.00%</u>	<u>0.50%</u>	<u>3.00%</u>		<u>"br + sv" Gr.</u>	<u>5.61%</u>

SOURCE: The Value Line Investment Survey; C.A. Turner Utility Reports;
 First Call Corporation

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BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

Discounted Cash Flow Growth Parameters
Green Mountain Power

<u>Historical Growth</u>					<u>Retention Growth</u>		
<u>Compound Growth</u>					<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
	<u>Historical Data</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Ratio (b)</u>	<u>Return (r)</u>	<u>(b+r)</u>
1	1996	2.22	2.12	22.15	0.045		
2	1997	1.57	1.61	22.02	-0.025		
3	1998	-0.80	0.96	20.09	2.200	-	
4	1999	0.46	0.55	18.60	-0.196	2.40%	-0.47%
5	2000	-0.06	0.55	16.53	10.167	-	
6	2001	1.88	0.55	17.81	0.707	10.70%	7.57%
7	2002	1.96	0.60	18.51	0.694	12.30%	8.53%
8							
9		<u>Compound Growth Rates</u>				<u>Ave. Internal</u>	
10	'96-2000	-	-28.63%	-7.06%		<u>Growth (br):</u>	5.21%
11						<u>ADD: External</u>	
12	'97-2001	4.61%	-23.55%	-5.17%		<u>Growth (sv):</u>	-0.15%
13							
14	'98-2002	-	-11.09%	-2.03%			
15						<u>Historic</u>	
16	<u>Ave. Compound Gr.</u>	<u>4.61%</u>	<u>-23.09%</u>	<u>-4.75%</u>		<u>"br + sv" Gr.</u>	<u>5.06%</u>
17							
18	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>			
19	<u>Historical Gr.</u>						
20	(Avg of 5 and 10 yr. if both are available)						
21							
22		<u>Projected Growth</u>					
23	<u>Retention Growth Calculation</u>				<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
24	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Ratio (b)</u>	<u>Return (r)</u>	<u>(b+r)</u>
25	2003	\$1.90	\$0.76	\$19.65	0.600	9.50%	5.70%
26	2004	1.95	0.80	19.80	0.590	10.00%	5.90%
27	2006-08 est'd	2.15	0.92	20.85	0.572	10.50%	6.01%
28							
29	<u>Analyst's Estimates</u>					<u>Projected</u>	
30	<u>Value Line</u>	9.50%	8.50%	3.00%		<u>Growth (br):</u>	5.87%
31						<u>ADD: External</u>	
32	<u>First Call</u>					<u>Growth (sv):</u>	0.00%
33							
34						<u>Projected</u>	
35	<u>Average</u>					<u>"br + sv" Gr.</u>	<u>6.01%</u>
36	<u>Proj'd Growth</u>	<u>9.50%</u>	<u>8.50%</u>	<u>3.00%</u>			

SOURCE: The Value Line Investment Survey; C.A. Turner Utility Reports; First Call Corporation

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BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

Discounted Cash Flow Growth Parameters
Hawaiian Electric Industries, Inc.

<u>Historical Growth</u>					<u>Retention Growth</u>		
<u>Compound Growth</u>					<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
	<u>Historical Data</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Ratio (b)</u>	<u>Return (r)</u>	<u>(b*r)</u>
1	1996	2.60	2.41	25.05	0.073		
2	1997	2.76	2.44	25.54	0.116		
3	1998	2.96	2.48	25.75	0.162	11.40%	1.35%
4	1999	2.89	2.48	26.31	0.142	11.00%	1.56%
5	2000	2.54	2.48	25.43	0.024	9.80%	0.23%
6	2001	3.19	2.48	26.11	0.223	11.60%	2.58%
7	2002	3.24	2.48	28.43	0.235	11.30%	2.65%
8							
9		<u>Compound Growth Rates</u>				<u>Ave. Internal</u>	
10	'96-2000	-0.58%	0.72%	0.38%		<u>Growth (br):</u>	1.77%
11							
12	'97-2001	3.69%	0.41%	0.55%		<u>ADD: External</u>	
13						<u>Growth (sv):</u>	1.01%
14	'98-2002	2.29%	0.00%	2.51%			
15						<u>Historic</u>	
16	<u>Ave. Compound Gr.</u>	<u>2.99%</u>	<u>0.38%</u>	<u>1.15%</u>		<u>"br + sv" Gr.</u>	<u>2.78%</u>
17							
18	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>			
19	<u>Historical Gr.</u>	<u>2.50%</u>	<u>0.75%</u>	<u>1.50%</u>			
20	(Avg of 5 and 10 yr. if both are available)						
21							
22		<u>Projected Growth</u>					
23		<u>Retention Growth Calculation</u>					
24	<u>Value Line</u>	<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>Retention</u>	<u>Equity</u>	<u>Growth</u>
25	2003	\$2.80	\$2.48	\$29.15	Ratio (b)	Return (r)	(b*r)
26	2004	2.85	2.48	30.10	0.114	9.50%	1.09%
27	2006-08 est'd	3.00	2.48	33.00	0.130	9.50%	1.23%
28					0.173	9.00%	1.56%
29							
30	<u>Analyst's Estimates</u>					<u>Projected</u>	
31	<u>Value Line</u>	-	-	3.50%		<u>Growth (br):</u>	1.29%
32	<u>First Call</u>	2.80%				<u>ADD: External</u>	
33						<u>Growth (sv):</u>	0.23%
34							
35	<u>Average</u>					<u>Projected</u>	
36	<u>Proj'd Growth</u>	<u>2.80%</u>	<u>=</u>	<u>3.50%</u>		<u>"br + sv" Gr.</u>	<u>1.79%</u>

SOURCE: The Value Line Investment Survey, C.A. Turner Utility Reports; First Call Corporation

BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

Stock Prices and Dividend Yields

	6-Week	2004	
	<u>Stock Price</u>	<u>Expected</u>	<u>Dividend</u>
		<u>Dividend</u>	<u>Yield</u>
Central Vermont Public Service	\$23.40	\$0.92	3.93%
Cleco Corporation	\$17.11	\$0.90	5.26%
Green Mountain Power	\$22.60	\$0.80	3.54%
Hawaiian Electric Industries	\$45.47	\$2.48	<u>5.45%</u>
			4.55%

Stock prices are daily average from 27 October 2003 through 3 December 2003.

BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

DCF Cost of Common Equity Calculations

DCF Cost of Equity using 6-week stock price

	Yield	Growth				Cost of Equity		
		Low	Average	High	Low	Average	High	
Central Vermont Public Service	3.93%	1.00%	2.55%	7.50%	4.93%	6.48%	11.43%	
Cisco Corporation	5.26%	0.50%	4.42%	7.75%	5.76%	9.69%	13.01%	
Hawaiian Electric Industries	3.54%	0.38%	2.01%	3.50%	3.91%	5.55%	7.04%	
Green Mountain Power	5.45%	3.00%	6.11%	9.50%	8.45%	11.57%	14.95%	
Average	4.55%	1.22%	3.77%	7.06%	5.77%	8.32%	11.61%	

DCF Using Average Projected Growth

	Dividend Yield	Average	Cost of Equity
		Projected Growth	
Central Vermont Public Service	3.93%	4.29%	8.23%
Cisco Corporation	5.26%	3.53%	8.79%
Hawaiian Electric Industries	3.54%	2.70%	6.23%
Green Mountain Power	5.45%	6.75%	12.21%
Average	4.55%	4.32%	8.86%

Cost of Equity Based on DCF Analysis

Dividend Yield	Growth	Cost of Equity
4.55%	5.00%	9.55%

Source: Schedules MB-6, MB-7.

BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

Capital Asset Pricing Model (CAPM) Cost of Common Equity (K_e)

$$\text{Formula: } K_e = R_f + \text{beta}(R_m - R_f)$$

Market Return Equal to Ibbotsons Large Company Stocks

Risk Free Rate (R _f):	4.25%	Risk Free Rate (R _f):	5.60%
Return on the Market (R _m):	12.20%	Return on the Market (R _m):	12.20%
Market premium:	7.95%	Market premium:	6.60%

	Beta	CAPM K _e	CAPM K _e
Central Vermont Public Service	0.45	7.83%	8.57%
Cleco Corporation	0.90	11.41%	11.54%
Hawaiian Electric Industries	0.60	9.02%	9.56%
Green Mountain Power	0.55	8.62%	9.23%
Average CAPM cost of equity:	0.63	9.22%	9.73%

Market Return Equal to Average of Large and Small Company Stocks

Risk Free Rate (R _f):	4.25%	Risk Free Rate (R _f):	5.60%
Return on the Market (R _m):	14.55%	Return on the Market (R _m):	14.55%
Market premium:	10.30%	Market premium:	8.95%

	Beta	CAPM K _e	CAPM K _e
Central Vermont Public Service	0.45	8.89%	9.63%
Cleco Corporation	0.90	13.52%	13.66%
Hawaiian Electric Industries	0.60	10.43%	10.97%
Green Mountain Power	0.55	9.92%	10.52%
Average CAPM cost of equity:	0.63	10.69%	11.19%

Overall average of all four calculations: 10.21%
 Overall average without Cleco Corporation: 9.43%

Source: Value Line Investment Survey, Ibbotson Associates;

BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

Return on Equity (ROE) Analysis Summary and Recommendation

DCF Analysis **9.55%**

Capital Asset Pricing Model Analysis

Method 1:	9.22%
Method 2:	9.73%
Method 3:	10.69%
Method 4:	11.19%
Overall average:	10.21%
Overall average with Cleco Corp:	9.43%

Recommendation

Low: 9.60%

High: 10.10%

BURDETTE - DIRECT
ER-2004-0034 Aquila, Inc.

Weighted Average Cost of Capital

	<u>Amount</u>	<u>Percent</u>	<u>Cost Rate</u>	<u>Weighted Cost</u>	<u>Cost Rate</u>	<u>Weighted Cost</u>
Common Stock Equity	\$1,607.9	40.14%	9.60%	3.85%	10.10%	4.05%
Long Term Debt	\$2,398.0	59.86%	7.48%	4.48%	7.48%	4.48%
	\$ 4,006	100.00%		8.33%		8.53%

Pre-Tax Interest Coverage

Tax factor = 1.62308

	<u>Weighted Cost</u>	<u>Pre-tax Weighted Cost</u>	<u>Weighted Cost</u>	<u>Pre-tax Weighted Cost</u>
Common Stock Equity	3.85%	6.25%	4.05%	6.58%
Long Term Debt	4.48%	4.48%	4.48%	4.48%
Total	8.33%	10.73%	8.53%	11.06%
Pre-tax weighted cost:		10.73%	Pre-tax wtd. cost:	11.06%
Cost of Debt:		4.48%	Cost of Debt:	4.48%
Pre-tax Interest Coverage		2.40		2.47

Source: Schedules MB-2, MB-5, MB-6, MB-7.

Aquila Networks - MPS & SJLP

Returns on Common Equity for 2002

For OPC Witness Burdette's Comparable Companies

Company Name	ROE
Central Vermont Public Service	9.30%
Cleco Corporation	13.10%
Green Mountain Power	12.30%
Hawaiian Electric Industries, Inc.	11.30%
Comparable Companies' Averages	11.50%
Witness Burdette's Proposed Return on Equity	9.6% -10.1%

Source: Direct Testimony of OPC Witness Mark Burdette, Schedule MB-5

Aquila Networks - MPS & SJLP

Before-Tax Interest Coverage Ratios

For OPC Witness Burdette's Comparable Companies

Company Name	Interest Coverage
Central Vermont Public Service	4.10
Cleco Corporation	3.10
Green Mountain Power	3.50
Hawaiian Electric Industries, Inc.	3.00
Comparable Companies' Averages	3.43
Witness Burdette's Proposed Interest Coverage	2.47

Source: Direct Testimony of OPC Witness Mark Burdette, Schedules MB-3 and MB-10

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-2004-0034

In the matter of Aquila, Inc. d/b/a Aquila)
Networks-L&P, for authority to file tariffs)
Increasing steam rates for the service provided)
To customers in the Aquila Networks-L&P area)

Case No. HR-2004-0024

County of Franklin)
~~Jackson~~)
State of Missouri)
Florida)

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AFFIDAVIT OF DONALD A. MURRY


Donald A. Murry, being first duly sworn, deposes and says that he is the witness who sponsors the accompanying testimony entitled "Rebuttal Testimony of Donald A. Murry;" 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.

Donald A. Murry
Donald A. Murry

Subscribed and sworn to before me this 23 day of January, 2004.

Karen Y. Brannan
Notary Public
~~Terry D. Lutes~~

My Commission expires:

 Karen Y. Brannan
MY COMMISSION # CC941741 EXPIRES
June 4, 2004
BONDED THRU TROY FAIR INSURANCE, INC.