

Control Number 45570

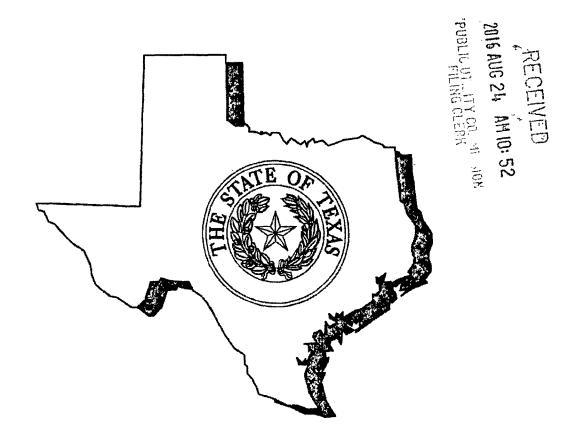


Item Number 286

Addendum StartPage 0

#### SOAH DOCKET NO. 473-16-2873.WS PUC DOCKET NO. 45570

APPLICATION OF MONARCH UTILITIES I, LP FOR AUTHORITY TO CHANGE RATES § BEFORE THE STATE OFFICE
 § OF
 § ADMINISTRATIVE
 § HEARINGS



DIRECT TESTIMONY OF
EMILY SEARS
WATER UTILITY REGULATION
PUBLIC UTILITY COMMISSION OF TEXAS
AUGUST 24, 2016

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1	ī.	INTRODUCTION OF WITNESS
2	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
3	A.	Ms. Emily Sears, Public Utility Commission of Texas, 1701 N. Congress Avenue, Austin,
4		Texas 78711-3326.
5		
6	Q.	BY WHOM ARE YOU CURRENTLY EMPLOYED AND IN WHAT CAPACITY?
7	A.	I have been employed by the Public Utility Commission of Texas (Commission) since
8		January 1, 2015 as a Financial Analyst in the Water Utilities Division.
9		
l0 l1	Q.	WHAT ARE YOUR PRINCIPAL RESPONSIBILITIES AT THE COMMISSION?
12	A.	I am responsible for reviewing certificate of convenience and necessity (CCN) applications
13		and amendments, sale/transfer/merger applications, tariff/rate change applications, stock
14		transfers, financial reviews, managerial reviews, and rate filings. I am also responsible for
15		preparing testimony and exhibits for contested case matters involving investor-owned, non-
16		profit and governmental water and sewer retail public utilities and wholesale matters, and
17		assisting with settlement negotiations.
18		
19	Q.	PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL
20		EXPERIENCE.
21	Α.	I have provided a summary of my educational background and professional experience in

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Attachment ES-1 to my direct testimony.

1	Q.	HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION OR THE
2		STATE OFFICE OF ADMINISTRATIVE HEARINGS (SOAH)?
3	A.	Yes. I have also testified before the Pennsylvania Public Utility Commission (PA PUC).
4		Attachment ES-2 provides a summary of the cases in which I have testified or submitted
5		testimony.
6		
7	·n.	PURPOSE AND SCOPE OF TESTIMONY
8	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?
9	A.	The purpose of my testimony is to present a recommendation for the rate of return (ROR)
10		for Monarch Utilities I, L.P. (Monarch or Company).
11		
12	Q.	WHAT IS THE SCOPE OF YOUR REVIEW?
13	A.	I reviewed the application, testimonies, and replies to requests for information of Monarch,
14		with respect to rate of return, including capital structure, the cost of debt, the cost of common
15		equity, and the overall fair rate of return. This recommendation pertains to the following
16		issues from the Commission's preliminary order for this case:
17		9. What is the appropriate debt-to-equity capital structure of the utility?
18		10. What is the appropriate overall rate of return, return on equity, and cost of debt for the
19		utility?
20		14. What is the appropriate weighted average cost of capital?
21		17. Does the utility have any debt? If so, what is the cost of that debt?

2

#### III. BACKGROUND

### 3 Q. PLEASE DEFINE THE TERM "RATE OF RETURN."

- 4 A. Rate of return generally is the amount of revenue an investment generates (in the form of net
- 5 income), usually expressed as a percentage of the amount of capital invested, over a given
- 6 period of time. Rate of return is one of the components of the revenue requirement formula.

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### Q. WHAT IS THE REVENUE REQUIREMENT FORMULA?

- 9 A. The revenue requirement formula used in base rate cases is as follows:
- $10 RR = E + D + T + (RB \times ROR)$
- 11 Where:
- 12 RR = Revenue Requirement
- E = Operating Expense
- D = Depreciation Expense
- T = Taxes
- RB = Rate Base
- 17 ROR = Overall Rate of Return
- In the above formula the rate of return is expressed as a percentage. The calculation of the
- 19 ROR is independent of the determination of the appropriate rate base value for ratemaking
- 20 purposes. As such, the appropriate total dollar return (RB x ROR) is dependent upon the
- 21 proper computation of the rate of return and the proper valuation of the utility's rate base.

22

1	Q.	WHAT CONSTITUTES A FAIR AND REASONABLE OVERALL RATE OF
2		RETURN?
3	A.	A fair and reasonable overall rate of return is one which will allow the utility the opportunity
4		to recover those costs prudently incurred by all classes of capital used to finance the rate base
5		during the prospective period in which its rates will be in effect.
6		The Bluefield Water Works & Improvements Co. v. Public Service Comm. of West
7		Virginia, 292 U.S. 679, 692-93 (1923), and the FPC v. Hope Natural Gas Co. 320 U.S. 591,
8		603 (1944) cases set forth the principles that are generally accepted by regulators throughout
9		the country as the appropriate criteria for measuring a fair rate of return:
10		1) A utility is entitled to a return similar to that being earned by other enterprises with
11		corresponding risks and uncertainties, but not as high as those earned by highly profitable
12		or speculative ventures;
13		2) A utility is entitled to a return level reasonably sufficient to assure financial soundness;
14		3) A utility is entitled to a return sufficient to maintain and support its credit and raise
15		necessary capital;
16		4) A fair return can change (increase or decrease) along with economic conditions and
17		capital markets.
18		
19	Q.	HOW IS THE RATE OF RETURN CALCULATED?
20	A.	The overall rate of return in this rate proceeding is calculated using the weighted average
21		cost of capital method. To calculate the weighted average cost of capital, the utility's capital
22		structure must first be determined by calculating the percentage of each capitalization
	Dire	ct Testimony of Emily Sears August 2016

component which has financed the rate base to total capital. The capital components consist
of long-term debt and common equity. Next, the effective cost rate of each capital structure
component must be determined. The cost rate of debt is typically fixed, and can be
computed accurately. The cost rate of common equity is not fixed and it is more difficult to
measure. Next, each capital structure component percentage is multiplied by its
corresponding effective cost rate to determine the weighted capital component cost rate.
Lastly, the sum of the weighted cost rates produces the overall rate of return. This overall
rate of return is multiplied by the rate base to determine the return portion of utility's revenue
requirement.

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### IV. COMPANY POSITION

## Q. PLEASE SUMMARIZE MONARCH'S RATE OF RETURN REQUEST IN THIS

13 CASE.

14 A. Based on the rate/tariff change application, Monarch requested the following rate of return:

Type of Capital	<u>Ratios</u>	Cost Rate	Weighted Cost Rate
Long-Term Debt	46.00 %	6.45 %	2.97 %
Common Equity	<u>54.00 %</u>	10.75 %	<u>5.81 %</u>
Total	<u>100,00 %</u>		<u>8.77 %</u>

Source: Application, Schedule II-C-1(1).

15

#### 16 V. STAFF POSITION

### 17 Q. PLEASE SUMMARIZE STAFF'S RECOMMENDATION IN THIS PROCEEDING.

Direct Testimony of Emily Sears

1 A. Staff recommends the following rate of return for Monarc
---

Type of Capital	Ratios	Cost Rate	Weighted Cost Rate
Long-Term Debt	47.37 %	6.36 %	3.01 %
Common Equity	<u>52.63 %</u>	8.48 %	<u>4.46 %</u>
Total	<u>100.00 %</u>		<u>7.47 %</u>

Source: Attachment ES-3

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#### 3 VI. PROXY (BAROMETER) GROUP

#### 4 Q. WHAT IS A PROXY GROUP, AS USED IN BASE RATE CASES?

A. A proxy group, also called a barometer group, is a group of companies which act as a benchmark for determining the subject utility's rate of return in a base rate case.

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#### Q. WHAT ARE THE REASONS FOR USING A BAROMETER GROUP?

Many public utility companies are not publicly traded, and therefore lack specific market
data. A barometer group provides that industry specific market data. Furthermore, a
barometer group of water utilities have shared common characteristics of regulated water
distribution utilities, and are well suited to comparison among utility companies. This
comparative method is a standard approach in utility rate cases.

14

15

### Q. ARE THERE ADDITIONAL REASONS FOR USING A BAROMETER GROUP?

16 A. Yes. A barometer group is typically utilized since the use of data exclusively from one company may be less reliable than using a barometer group. The lower reliability occurs

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1		because the data for one company may be subject to events which can cause short-term
2		anomalies in the marketplace. The rate of return on common equity for a single company
3		could become distorted in these particular circumstances, and would therefore not be
4		representative of similarly situated companies. The use of a barometer group has the effect
5		of smoothing out potential anomalies associated with a single company.
6		A barometer group cost of equity is also used as a benchmark to satisfy the long
7		established guideline of utility regulation that seeks to provide the subject utility with the
8		opportunity to earn a return equal to that of similar risk enterprises.
9		
10	Q.	WHAT CRITERIA DID YOU USE IN SELECTING YOUR BAROMETER GROUP
11		COMPANIES?
12	A.	As in this docket, I generally use the following criteria when selecting a barometer group: 1)
13		50% or more of the company's revenues must be generated from the water utility distribution
14		industry; 2) the company's stock must be publicly traded; 3) investment information for the
15		company must be available from more than one source; and 4) the company must not be
16		currently involved/targeted in an announced merger or acquisition.
17		
18	Q.	WHAT CRITERIA DID MONARCH WITNESS MR. PAUL MOUL USE IN
19		SELECTING HIS BAROMETER GROUP COMPANIES?
20	A.	Mr. Moul's criteria for the Water Group are as follows: '(i) they are contained in The
21		Value Line Investment Survey; (ii) they have stock that is publicly traded, and (iii) they are

1		not currently the target of a publicly-announced merger or acquisition.
2		
3	Q.	WHAT BAROMETER GROUP DID YOU USE IN YOUR ANALYSIS?
4	A.	I selected American States Water Company, American Water Works, Aqua America,
5		California Water Service Group, Connecticut Water Service, Middlesex Water, SJW
6		Corporation, and York Water.
7		
8	Q.	WHAT BAROMETER GROUP DID MR. MOUL USE IN HIS ANALYSIS?
9	A.	Mr. Moul uses the same barometer group, with the addition of Artesian Resources Corp. <sup>2</sup>
10		
11	Q.	WHY DO YOU NOT USE ARTESIAN RESOURCES CORP. IN YOUR ANALYSIS?
12	A.	Artesian Resources Corp. is a part of the small-midcap Value Line Investment Survey, to
13		which Staff does not have access.
14		
15	VII.	CAPITAL STRUCTURE
16	Q.	WHAT DOES CAPITAL STRUCTURE REPRESENT IN A RATE CASE?
17	A.	Capital structure represents the financing of long-term assets (rate base). The primary forms
18		of financing employed by public utilities includes debt and common equity.
19		
	***************************************	
		ct Testimony of Paul R. Moul, page 7, line 22 – page 8, line 1. ibit PRM-1, Schedule PRM-3, page 2 of 2.
		t Testimony of Emily Score

1	Q.	WHAT IS MONARCH'S CLAIMED CAPITAL STRUCTURE?
2	A.	Monarch is claiming a hypothetical capital structure of 46.00% debt, and 54.00% equity.
3		
4	Q.	WHAT IS THE BASIS FOR MONARCH'S CLAIMED CAPITAL STRUCTURE?
5	A.	Mr. Moul testifies that Monarch's actual capital structure at year-end 2014 is 33.8% debt,
6		and 66.2% equity. Mr. Moul states this is unusual, and using a hypothetical capital structure
7		equal to that of the average of the barometer group will shift Monarch's financial risk to be
8		equal to that of the barometer group, and synchronize the cost of equity determination in this
9		case.3 Mr. Moul used the barometer group average capital structure for the year ending
10		December 31, 2014.
11		
12	Q.	WHAT IS YOUR RECOMMENDATION REGARDING MONARCH'S CAPITAL
13		STRUCTURE?
14	A.	I recommend using a hypothetical capital structure of 47.37% debt and 52.63% equity.
15		
16	Q.	WHAT IS THE BASIS FOR YOUR RECOMMENDATION TO USE A
17		HYPOTHETICAL CAPITAL STRUCTURE?
18	A.	A capital structure should be representative of the industry norm, and be an efficient use of
19		capital. The use of a capital structure that is outside the range of the industry's capital
20		structure may result in an overstated overall rate of return.

Direct Testimony of Paul R. Moul, page 20, lines 2-12.
 Direct Testimony of Emily Sears

1		The current 5-year average capital structure of the barometer group (the industry norm)
2		is 47.37% debt and 52.63% equity. <sup>4</sup> In this case, Monarch's actual capital structure at the
3		end of the June 30, 2015 is 32.14% debt and 67.86% equity. This is not representative of
4		current capital structures among water utility distribution systems and is an inefficient use of
5		capital.
6		Therefore, a hypothetical capital structure based upon an industry average should be
7		used for ratemaking purposes.
8		
9	Q.	WHY DO YOU USE A 5-YEAR AVERAGE, INSTEAD OF THE YEAR ENDING
10		DECEMBER 31, 2014?
11	A.	There are several reasons. First, capital structures tend to fluctuate over time. Using a 5-
12		year average can give a better idea of the central tendency of a capital structure. In theory
13		there is an 'optimal' capital structure. This 'optimal' capital structure is one which
14		minimizes the cost of capital for the utility. In the case of regulated utilities, the historic
15		capital structures have included debt of approximately 45-55%, with an average of 50%.
16		This could be considered utilities 'optimal' capital structure, and also the central tendency
17		of a utility capital structure over time.
18		Second, while long-term debt in capital structures was decreasing from 2010-2014, it
19		increased in 2015. Value Line also shows the percentage of long-term debt in capital

<sup>&</sup>lt;sup>4</sup> Attachment ES-3, page 2 of 2.

1		attended to the control of the contr
1		structures continuing to increase in 2016 and 2017. <sup>5</sup> Using a 5-year average eliminates the
2		'snapshot' of 2014, in which you would only see the lowest long-term debt percentage
3		utilities may tolerate before reverting towards the 'optimal' capital structure.
4		Finally, due to the current low interest rate environment, utilities with the capability of
5		taking on debt should take advantage of this market to lower their overall cost of capital.
6		
7	VIII.	COST RATE OF LONG-TERM DEBT
8	Q.	WHAT IS MONARCH'S CLAIMED COST RATE OF LONG-TERM DEBT?
9	Α.	Monarch calculates its claimed effective cost rate of long-term debt to be 6.45%.
10		
11	Q.	WHAT IS THE BASIS FOR MONARCH'S CLAIMED COST RATE OF LONG-
12		TERM DEBT?
13	A.	Monarch's claim of 6.45% is the weighted cost of debt of all debt issuances, adjusted for net
14		proceeds.
15		
16	Q.	WHAT ARE NET PROCEEDS?
17	A.	Net proceeds can be defined as the amount of money received from a loan, after subtracting
18		transaction costs.
19		
20	Q.	WHAT IS YOUR RECOMMENDATION REGARDING MONARCH'S COST RATE
	······································	
	5 Attac	chment ES-4.
		t Testimony of Emily Sears August 2016

		-
1		OF LONG-TERM DEBT?
2	A.	Staff recommends using the actual weighted cost of debt of 6.36%, unadjusted for net
3		proceeds.6
4		
5		
6	Q.	WHAT IS THE BASIS FOR YOUR RECOMMENDATION?
7	A.	Monarch calculated an overall cost rate of 6.36% unadjusted for net proceeds. Given that
8		Monarch's hypothetical capital structure includes more debt than the actual capital structure,
9		any difference for net proceeds is included.
10		For example, the actual debt costs are \$25,625,704 at a cost rate of 6.36%. Because
l 1		any issuance costs removed from that amount are not included in rate base, the utility can
12		use the net proceeds of \$25,350,684 with a cost rate of 6.45%. However, this only can occur
13		if the actual capital structure is used. Since the Staff's hypothetical capital structure would
14		set the debt at \$37,359,491 based on Monarch's claimed rate base of \$78,867,407. the use of
15		the actual cost rate of 6.36% is more appropriate.
16		
17	IX.	EQUITY ANALYSIS
18	Q.	WHAT IS YOUR RECOMMENDATION FOR THE APPROPRIATE COST OF
19		COMMON EQUITY IN THIS PROCEEDING?
20	A.	Based upon my analysis, I recommend a cost of common equity of 8.48%.

6	Monarch	filing,	schedule	II-C-4,	Long-Term	Debt.
---	---------	---------	----------	---------	-----------	-------

Q.	WHAT IS THE BASIS FOR YOUR RECOMMENDATION?
A.	I arrived at this equity return using the Discounted Cash Flow (DCF) method. My DCF
	analysis employed a spot dividend yield, a 52-week dividend yield, and earnings growth
	forecasts. I also used the Capital Asset Pricing Model (CAPM) method as a comparison to
	my DCF results.
A	. DISCOUNTED CASH FLOW (DCF)
Q.	WHAT IS THE THEORETICAL BASIS FOR THE DCF METHOD?
A.	The theoretical basis for the DCF model is the 'dividend discount model' of financial
	theory, which maintains that the value (price) of any security or commodity is the
	discounted present value of all future cash flows. The DCF model assumes that investors
	evaluate stocks in the classical economic framework, which maintains that the value of a
	financial asset is determined by its earning power, or its ability to generate future cash
	flows.
Q.	PLEASE EXPLAIN YOUR DCF ANALYSIS.
A.	My analysis employs the standard discrete DCF model as portrayed in the following formula
	$k = D_1/P_0 + g$
	Where:
	k = Cost of equity
	D <sub>1</sub> = Dividend expected during the year

1	***************************************	P <sub>0</sub> = Current price of the stock		
2		g = Expected growth rate of dividen	ds	
3		When a forecast of $D_1$ is not available, $D_0$	(the current dividend) must be adjusted by ½ the	
4		expected growth rate <sup>7</sup> in order to account	for changes in the dividend paid in period 1. In	
5		this case I have used a forecast of D <sub>1</sub> .		
6				
7	Q.	PLEASE EXPLAIN HOW YOU DEVE	LOPED THE DIVIDEND YIELDS USED IN	
8		YOUR DCF ANALYSIS.		
9	A.	A representative dividend yield must be	calculated over a time frame that avoids the	
10		problems of short-term anomalies and 'stale' data series. For purposes of my DCF analysis,		
11		the dividend yield calculation places equa	emphasis on the most recent spot, and 52-week	
12		average dividend yield. The following ta	ble summarizes my dividend yield computations	
13		for the barometer group:		
		Eight Company Barometer G	roup Dividend Yield	
		Spot	2.16%	
		52-week average	2.51%	

2.34%

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Average

Source: Attachment ES-5

The adjustment of ½ the growth rate is used when the timing of the dividend increase is not known for certain. It could occur next month, or in the twelfth month. On average, it is safe to assume that the increase will occur half way through the prospective year. Therefore, an adjustment by ½ the expected growth rate is appropriate.

l	Q.	WHAT INFORMATION DID YOU RELY UPON TO DETERMINE YOUR
2		EXPECTED GROWTH RATE?
}	A.	I have examined the earnings growth forecasts.
Ļ		
;	Q.	PLEASE EXPLAIN YOUR USE OF EARNINGS GROWTH FORECASTS.
5	A.	I have used 5-year projected growth rate estimates from established forecasting entities
7		including Value Line, Reuters, Zacks, and Morningstar.
}		
)	Q.	WHAT WERE THE RESULTS OF YOUR FORECASTED EARNINGS GROWTH
)		RATES?
	A.	The expected growth rates for the eight company barometer group are 4.55%, 7.24%, 6.45%,
2		8.55%, 3.55%, 3.85%, 7.75%, and 5.45%. The average of the eight companies' growth rate
3		forecasts is 6.15%.8
ļ		
i	Q.	WHAT ARE THE RESULTS OF YOUR DISCOUNTED CASH FLOW ANALYSIS
,		BASED ON YOUR RECOMMENDED DIVIDEND YIELDS AND GROWTH
,		RATES?
3	A.	Using a dividend yield of 2.34% and a growth rate of 6.15%, the DCF result is 8.48%.9
•		
		achment ES-6.
	Dira	at Tactimony of Emily Sage

## B. CAPITAL ASSET PRICING MODEL (CAPM)

#### 2 Q. WHAT IS THE THEORETICAL BASIS FOR THE CAPM?

3 The Capital Asset Pricing Model describes the relationship of a stock's investment risk and A. 4 its market rate of return. It identifies the rate of return investors expect so that it is 5 comparable with returns of other stocks of similar risk. The method hypothesizes that the 6 investor required return on a company's stock is equal to the return on a 'risk free' asset 7 plus an equity premium reflecting that company's investment risk. In the CAPM, two 8 types of risk are associated with a stock: (1) firm-specific risk (unsystematic risk) and (2) 9 market risk (systematic risk) which is measured by a firm's beta. The CAPM only allows 10 for investors to receive a return for bearing systematic risk. Unsystematic risk is assumed

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13 Q. EXPLAIN YOUR LIMITED USE OF THE CAPM MODEL.

to be diversified away. Therefore it does not earn a return.

14 A. I have included a CAPM analysis to confirm the DCF results submitted in base rate cases by

15 the use of a second method.

16

17

- Q. PLEASE EXPLAIN YOUR CAPM ANALYSIS.
- 18 A. My analysis employs the standard CAPM as portrayed in the following formula:
- $19 K = R_f + \beta (R_m R_f)$
- Where:
- k = Cost of equity
- $R_f = Risk-free ROR$

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<sup>10</sup> Attachment ES-8.

Direct Testimony of Emily Sears

R<sub>m</sub>= Expected ROR on the overall stock 1 2  $\beta$  = Beta measures the systematic risk of an asset 3 The CAPM formula above is actually a form of the more general risk premium approach and 4 is based on modern portfolio theory. 5 WHAT IS BETA, AS EMPLOYED IN YOUR USE OF THE STANDARD CAPM 6 Q. 7 MODEL? 8 A. Beta is a measure of the systematic risk of a stock in relation to the rest of the stock market. 9 A stock's beta is estimated by running a linear regression of a stock's return against the return 10 on the overall stock market. The beta of a stock with an identical price pattern as the overall 11 stock market will have a beta of 1. A stock with a price movement that is greater than the 12 overall stock market will have a beta that is greater than 1, and would be described as having 13 more investment risk than the market. Conversely, a stock with a price movement that is 14 less than the overall stock market will have a beta of less than 1, and would be described as 15 having less investment risk than the market. 16 17 Q. WHAT BETA DID YOU CHOOSE FOR YOUR CAPM ANALYSIS? 18 In estimating an equity cost rate for the group of eight water utility companies, I used the A. 19 average of the betas for the water utility companies as provided in the Value Line Investment 20 Survey. The average beta for the eight water utility companies' barometer group is 0.69.10

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#### O. WHAT RISK-FREE ROR HAVE YOU CHOSEN FOR YOUR CAPM ANALYSIS?

For my CAPM analysis, I have chosen to use the risk-free rate of return (R<sub>f</sub>) from the historic yield on 10-year Treasury Bonds. While the yield on the short-term T-Bill is a more theoretically correct parameter to represent a risk-free yield, this yield can be extremely volatile. The volatility of short-term T-Bills is directly influenced by Federal Reserve policy. At the other extreme, the 30-year Treasury bond yield exhibits more stability, but is not risk-free. Long-term Treasury Bonds have substantial maturity risk associated with the market risk and the risk of unexpected inflation. Long-term treasuries normally offer higher yields to compensate investors for these risks. As a result, I chose to use the yield on the 10-year Treasury bond because it balances the short comings of the other two alternatives. For my historic analysis, I chose 4.42%, which is the averages of the 10 year Treasury yield over time periods matching the historic market return. For my future analysis, I chose 2.39%, which is the average of the 10-year Treasury yields over 6 quarters and the 5 year projection.<sup>11</sup>

16

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# Q. PLEASE EXPLAIN HOW YOU DETERMINED THE RETURN ON THE OVERALL STOCK MARKET, AS EMPLOYED IN YOUR CAPM ANALYSIS.

A. To arrive at a representative expected return on the overall stock market, I surveyed three sources. Value Line expects its universe of 1,500 stocks to have an average yearly return

<sup>11</sup> Attachment ES-9.

of 12.03% over the next 3 to 5 years, based on a forecasted dividend yield of 2.30% and a
yearly index appreciation of 45%. Yahoo! Finance expects the S&P 500 index to have an
average yearly return of 11.02% over the next five years, based upon a forecasted dividend
yield of 2.22% and an expected increase in the S&P 500 index of 8.80%. A historical return
for the S&P Composite Index is routinely used as a benchmark for the expected return on
the overall stock market. This component can vary widely depending on the historic period
used.

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# Q. EXPLAIN THE RANGE OF EXPECTED RETURN ON THE OVERALL STOCK MARKET YOU CALCULATED USING THE HISTORICAL RETURN FOR THE S&P COMPOSITE INDEX.

12 A. Using the geometric mean of historic returns, I calculated the following results:

Time Period	Return
5 Years	12.57%
10 Years	7.30%
20 Years	8.19%
40 Years	11.34%
90 Years	10.02%
Average	9.88%

Source: Attachment ES-10

#### 13 Q. WHY HAVE YOU SELECTED THESE TIME PERIODS?

Direct	Testimony	v of	Emily	Sears
	TOUCTATION	, w.		~~~~

Ā.		
1 1.	I have selected the above time periods to represer	nt a variety of investor experiences and time
	horizons. The 90-year time period represents the	ne longest measurable time period available
	for the S&P Composite Index. The 40 and 20-y	year time periods coincide with the average
	useful lives of a utility's assets. The 10-year t	time period corresponds with the Treasury
	Bond that I have employed. The 5-year time pe	eriod corresponds with time period the DCF
	growth rates are projected.	1
Q.	WHAT ARE THE COST OF EQUITY RE	SULTS FROM YOUR FORECASTED
	AND HISTORIC CAPM ANALYSES?	
A.	The results of these two analyses are as follows:	
	CAP	M cost of equity
	Forecasted	8.73%
	Historic	8.22%
	Source: Attachment ES-11	
Q.	HOW DID YOU INCORPORATE THESE	E RESULTS INTO YOUR OVERALL
	COST OF EQUITY?	
A.	I have included the results of my CAPM analyst	sis in my overall cost of equity calculation
	only as a comparison to my DCF result. The	e DCF model measures the cost of equity
	directly by measuring the discounted present va	due of future cash flows of the company. It
	is these cash flows that actually pay dividends to	shareholders.
	A.	for the S&P Composite Index. The 40 and 20-yuseful lives of a utility's assets. The 10-year is Bond that I have employed. The 5-year time per growth rates are projected.  Q. WHAT ARE THE COST OF EQUITY REAND HISTORIC CAPM ANALYSES?  A. The results of these two analyses are as follows:  CAP  Forecasted  Historic  Source: Attachment ES-11  Q. HOW DID YOU INCORPORATE THESE COST OF EQUITY?  A. I have included the results of my CAPM analy only as a comparison to my DCF result. The directly by measuring the discounted present values.

Direct Testimony of Emily Sears

	P.U.C.	Page 21
1	X.	CRITIQUE OF COMPANY RECOMMENDATION
2	Q.	WHAT ADJUSTMENTS HAS THE COMPANY MADE TO ITS COST OF EQUITY
3		ANALYSIS?
4	A.	Mr. Moul adjusted his DCF indicated cost of common equity upward 89 basis points to
5		account for his leverage claim. Mr. Moul also adjusted his CAPM indicated cost of
6		common equity upward by 110 basis points to reflect his claim that Monarch has higher
7		business risk due to its small size relative to his proxy group.
8		
9	Q.	DO YOU AGREE WITH MR. MOUL'S PROPOSED COST OF EQUITY?
10	A.	No. Mr. Moul's cost of equity recommendation is biased due to several errors. He has
11		given undue weight to the Risk Premium method and CAPM, and has included the faulty
12		Comparable Earnings (CE) method in his analysis. Mr. Moul's DCF is distorted because
13		he employs an inflated DCF growth rate and an uncalled for dividend yield adjustment. In
14		addition, Mr. Moul employs inflated CAPM betas. Mr. Moul has made uncalled for
15		leverage and size risk adjustments.
16		
17	A	. WEIGHTS GIVEN TO METHODS
18	Q.	DO YOU AGREE WITH THE COMPANY'S RELIANCE ON THE USE OF THE
19		CAPM AND RP MODELS?
20	A.	No. While I am not opposed to using the CAPM results as a comparison to the results of
21		the DCF calculation, as discussed previously in this testimony, it is inappropriate to give the

CAPM and RP models comparable weight. The CAPM and the RP method are less reliable

indicators because they measure the cost of equity indirectly, and risk premiums vary 1 2 depending on the debt and equity being compared. Also, regulators can never be certain 3 that economic and regulatory conditions underlying the historical period during which the 4 risk premiums were calculated are the same today or in the future. 5 6 COMPARABLE EARNINGS METHOD WHAT ARE THE LIMITATIONS OF THE COMPARABLE EARNINGS 7 Q. 8 APPROACH? The CE approach employed by Mr. Moul compares projected returns of companies of A. 10 dissimilar business and financial risk. Mr. Moul's barometer group for this method is ever 11 changing, and lacks current market data. Finally, Mr. Moul's use of book returns between 12 8% and 20% is skewed. Although Mr. Moul does not use the CE method in his average 13 when determining the cost of equity for this case, he does state that he relied upon the CE method in his analysis.<sup>12</sup> 14 15 16 EXPLAIN HOW MR. MOUL'S CE APPROACH IS FAULTY. Q. 17 The companies in Mr. Moul's analysis are not utilities, thus they are too dissimilar for A.

Comparable Earnings. The companies in Mr. Moul's CE barometer group are simply not

comparable to water distribution utilities in terms of their business risk /financial risk profile.

Water distribution utilities, being monopolies with very low business risk, are able to

12 Direct Testimony of Paul R. Moul, page 7, lines 14-17.

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maintain higher financial risk profiles by employing more leverage. Conversely, since Mr.

Moul's CE barometer group companies are in an unregulated competitive environment with

much higher business risk, they must maintain lower financial risk profiles by employing

minimal leverage.

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# Q. PLEASE EXPLAIN HOW MR. MOUL'S CE BAROMETER GROUP IS EVER CHANGING?

Mr. Moul's group of companies were selected from Value Line as of July 2015 and had similar risks based on his factors (timeliness rank, safety rank, financial strength, price stability, beta, and technical rank). However, these factors change, which changes the CE group. As of April 2016, of the 15 companies on Mr. Moul's list, only 4 were in his new updated CE group. Mr. Moul also added 3 companies to his new updated CE group. This shows that the risks of the companies changes with the economy. Value Line updates several industries a week on a rotating basis, and it takes 3 months for the same industry to be re-evaluated. Using the returns for the companies listed in Mr. Moul's CE group going back nine months, let alone six years, is not appropriate because the companies are only similar for one short period of time (as little as one week). Therefore, the results for any given week cannot be relied upon to determine long-term costs of equity.

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<sup>13</sup> Exhibit PRM-1, page 24 of 25, Schedule 13 [2 of 3].

<sup>14</sup> Attachment ES-12.

# Q. CAN YOU PLEASE EXPLAIN HOW THE LACK OF CURRENT MARKET DATA DIMINISHES THE VALUE OF THE CE APPROACH?

A. Yes. Mr. Moul includes the historical years of 2010-2014. He proceeds to exclude current market data including the years 2015-2017. Mr. Moul then picks up using projected information from 2018-2020. This diminishes the value of the CE approach as Mr. Moul is excluding three years of recent information, which is clearly imprudent when Mr. Moul's goal is to 'span an entire business cycle. Furthermore, the historical (2010-2014) and estimated (2018-2020) accounting returns do not include any information on what market

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# Q. PLEASE EXPLAIN HOW MR. MOUL'S USE OF RETURNS BETWEEN 8% AND 20% IS SKEWED.

A. Mr. Moul chooses returns above 8% and below 20%. Excluding the values in Mr. Moul's CE Approach below 8% and above 20% reduces the group from 13 companies to 4 companies. Of the 4 remaining values, the average return is 13.8%, and the median data points are 12.5% and 19.0%. However, Mr. Moul's documentation shows that in 2015 the average authorized return for gas and electric companies was 9.76%. This shows Mr. Moul's bias towards the high end of returns, and shows that his range is unreasonable.

Furthermore, using his range, the 4 companies that stayed in his barometer group from

return investors expect today (2016).

<sup>&</sup>lt;sup>15</sup> Exhibit PRM-1, Page 24 of 25, Schedule 13 [2 of 3].

<sup>&</sup>lt;sup>16</sup> Attachment ES-13.

July 2015 to April 2016 would not be included in his average, as they were outside his range. 1 2 This only further invalidates his use of the CE method as a reasonable method. 3 C. DIVIDEND YIELD ADJUSTMENT 4 5 Q. WHAT DIVIDEND YIELD ADJUSTMENT HAS MR. MOUL PROPOSED IN HIS 6 ANALYSIS? 7 Mr. Moul has proposed an ex-dividend adjustment to the dividend yields of his barometer A. 8 group. Mr. Moul adjusts the 'month-end prices to reflect the buildup of the dividend in the 9 price that has occurred since the last ex-dividend date. '17 10 11 Q. WHY IS MR. MOUL'S EX-DIVIDEND ADJUSTMENT INAPPROPRIATE? 12 A. Mr. Moul's ex-dividend adjustment is inappropriate for three reasons. First, my experience 13 has not included any support for the application of an ex-dividend adjustment to the dividend 14 yield in the DCF formula as proposed by Mr. Moul. There are numerous publications 15 explaining an ex-dividend date, which is the date at which the stock price is being reduced 16 approximately by the amount of the dividend, and is the date before which you must own stock to obtain that dividend. I am not familiar with any academic evidence showing that 17 18 any type of adjustment is made to the dividend yield for this occurrence. 19 Second, Mr. Moul has not provided any evidence in his testimony that suggests investors 20 make this adjustment in the context of the DCF model. Long-term stockholders generally

<sup>17</sup>Direct Testimony of Paul R. Moul, page 23, lines 8-10.

1 do not run into a problem with ex-dividend dates, as they hold their stock through price cycles. The time at which ex-dividend dates are relevant is when an investor wants to exit 2 3 ownership of a stock, but would like to receive the dividend first. Finally, I am not aware of any financial publications that provide ex-dividend adjusted 4 5 yields to investors that might be used for their financial investment decision making. Arguably, if such information were an important factor in an investor's decision making 6 7 process then mainstream financial publications would include it on a regular basis. This idea is supported by Mr. Moul's own testimony in which he states (regarding forecasts) 8 9 investors really required forecasts that extended beyond five years to properly value common 10 stocks, then I am sure that some investment advisory service would begin publishing that 11. information for individual stocks to meet the demands of investors. The absence of such a publication is proof that investors do not require infinite forecast to purchase and sell stocks 12 in the marketplace. '18 13 14 LEVERAGE (MARKET-TO-BOOK) ADJUSTMENT 15 WHAT IS FINANCIAL LEVERAGE? 16 Q. 17 A. Generally, financial leverage is the use of debt capital to supplement equity capital. A firm

with significantly more debt than equity is considered to be highly leveraged.

#### O. WHAT IS A MARKET-TO-BOOK RATIO?

18 Direct Testimony of Paul R. Moul, page 29, lines 16-21.

Direct Testimony of Emily Sears

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1	A.	Generally, a market-to-book ratio is used to evaluate a public firm's equity value. This is
2		done by comparing a company's equity market value to a company's equity book value.
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4	Q.	WHAT ADJUSTMENT HAS MR. MOUL PROPOSED IN HIS ANALYSIS?
5	A.	Mr. Moul proposes to make an 85 basis point 'leverage' adjustment to his DCF. Mr. Moul
6		proposes that the adjustment arises when the results of the DCF model (k) are to be applied
7		to a capital structure that is different than that which underlies the market price (P). 19
8		
9	Q.	IS THE TERM "LEVERAGE" APPROPRIATE FOR THIS TYPE OF
10		ADJUSTMENT?
11	A.	No. Mr. Moul does not propose to change the capital structure of the utility (a leverage
12		adjustment), nor does he propose to apply the market-to-book ratio to the DCF model (a
13		market-to-book adjustment). Instead, Mr. Moul is proposing to make an adjustment to
14		account for applying the market value cost rate of equity to the book value of the utility's
15		equity. Currently, I am unaware of any academic journals or text books that describe this
16		type of adjustment.
17		
18	Q.	WHAT IS THE BASIS FOR MR. MOUL'S PROPOSED LEVERAGE
19		ADJUSTMENT?

Direct Testimony of Paul R. Moul, page 33, lines 2-4.

Direct Testimony of Emily Scars

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2 average cost of capital based on a book value capital structure used for ratemaking purposes, 3 those results will not reflect the higher level of financial risk associated with the book value capital structure. Mr. Moul believes that this is because market valuations of equity are 4 5 based on market value capital structures, which in general have more equity, less debt and 6 therefore, less risk than the capitalization measured at its book value. Mr. Moul further references cases where the PA PUC accepted his adjustment as support for this adjustment.<sup>20</sup> 7 8 DO YOU AGREE WITH MR. MOUL'S "LEVERAGE ADJUSTMENT"? 9 Q. 10 Α. No. Mr. Moul's adjustment is inappropriate for several reasons. These reasons include the 11 Value Line published capital structure, the rating agency characterization of financial risk, 12 the PA PUC precedent, lack of support in academic literature, Mr. Moul's testimony regarding his adjustment, and flaws in Mr. Moul's formula for the adjustment. 13 14 WHAT CAPITAL STRUCTURE DOES VALUE LINE PUBLISH FOR WATER 15 Q.

Mr. Moul theorizes that if regulators use the results of the DCF to compute the weighted

17 A. Value Line publishes the book value capital structure and the book value of debt. Value

capitalization, which refers only to the amount of shares outstanding multiplied by the

Line does not publish the market value capital structure. It merely publishes the market

current price, which changes daily. Mr. Moul testifies that the market return is based upon

DISTRIBUTION UTILITIES?

<sup>&</sup>lt;sup>20</sup> Direct Testimony of Paul R. Moul, page 32, lines 1-9.

1	**************************************	market valued capital structures; however this is untrue in the regulated utility industry, using
2		Value Line. Investors base their decisions and therefore their required market return on the
3		book value capital structures, not the market value capital structures; therefore, no leverage
4		adjustment is needed.
5		
6	Q.	PLEASE EXPLAIN HOW RATING AGENCIES ASSESS FINANCIAL RISK.
7	A.	Rating agencies assess financial risk based upon the company's booked debt obligations and
8		the ability of its cash flow to cover the interest payments on those obligations. The agencies
9		use a company's financial statements for their analysis, not market capitalization. True
10		financial risk resides in the income statement, and is a function of the actual amount of
11		interest expense and income volatility. Therefore, regardless of how the Company's
12		investments are valued in the market place, the financial risk does not change.
13		This is important because when investors determine their required rate of return, they
14		take into consideration a company's risk. A company can only have one risk profile, and as
15		stated above investors look at the book value capital structure.
16		
17	Q.	PLEASE DISCUSS WHY THE PA PUC'S PRECEDENT INVALIDATES MR.
18		MOUL'S SUPPORT FOR THE "LEVERAGE ADJUSTMENT."
19	A.	There are several cases in which the same 'leverage adjustment' has been rejected. First,
20		in Pennsylvania Public Utility Commission v. Metropolitan Edison Co. Docket No. R-
21		00061366, p. 135 (Order entered January 11, 2007), the PA PUC did not accept the
22		Company's financial risk increment related to the leverage difference between market capital

1	<del></del>	structures and book value capital structures.
2		Second, in Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. Docket
3		No. R-00072711, (Order entered July 31, 2008), the PA PUC rejected the ALJ's
4		recommendation for a leverage adjustment stating the fact that we have granted leverage
5		adjustments in the past does not mean that such adjustments are indicated in all cases. '21
6		Finally, in the most recent case of Pennsylvania Public Utility Commission, et al v. City
7		of Lancaster - Bureau of Water. Docket No. R-2010-2179103, the PA PUC agreed with the
8		Investigation & Enforcement position and stated in the Order entered July 14, 2011, 'any
9		adjustment to the results of the market based DCFare unnecessary and will harm
10		ratepayers. Consistent with our determination in Aqua 2008 there is no need to add a
l 1		leverage adjustment.
12		The PA PUC also has a Quarterly Earnings Report which determines a Distribution
13		Service Improvement Charge return based upon a formula determined by the PA PUC with
14		input from all parties affected. The Quarterly Earnings Report formula does not include a
15		leverage adjustment. These cases show that the PA PUC has not consistently recognized,
16		nor made a policy of including, Mr. Moul's leverage adjustment, and is not support that this
17		adjustment is needed or appropriate.
18		
19	Q.	WHAT DOES MR. MOUL'S TESTIMONY STATE REGARDING THE LEVERAGE

<sup>21</sup> O	pinion	at	p.	38.
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Direct Testimony of Emily Sears

ADJUSTMENT?

Mr. Moul contradicts himself in his direct testimony. First, on page 34, lines 4-6, he states 1 Α. 2 that 'the leverage adjustment is not intended, nor was it designed, to address the reasons that 3 stock prices vary from book value. Hence, any observations concerning market prices 4 relative to book value are not on point. Then, on lines 14-34, he discusses why utility 5 stocks are trading at relatively high market prices, how stock prices are above book value, 6 and current market to book multiples as support for his adjustment. Mr. Moul's support for 7 his leverage adjustment is unrelated.

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#### Q. HOW DOES MR. MOUL CALCULATE THE LEVERAGE ADJUSTMENT USED

#### 10 IN HIS ANALYSIS?

- 11 A. Mr. Moul states, 'The 0.89% [leverage] adjustment is merely a convenient way to compare
- the 9.89% return computed directly with the Modigliani & Miller formulas to the 9.00%
- return generated by the DCF model based on a market value capital structure. '22

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#### 15 Q. WHAT FORMULA DOES MR. MOUL USE TO CALCULATE THE 9.89% RETURN

#### 16 COMPUTED DIRECTLY WITH THE MODIGLIANI & MILLER FORMULAS?

17 A. Mr. Moul uses the following formulas:<sup>23</sup>

18 
$$ku = ke - (((ku - i) 1-t) D/E) - (ku - d) P/E$$

19 and ke = ku + (((ku - i) 1-t) D/E) + (ku - d) P/E

<sup>&</sup>lt;sup>22</sup> Direct Testimony of Paul R. Moul, page 36, lines 11-14.

<sup>&</sup>lt;sup>23</sup> Exhibit PRM-1, p. 14 of 25, Schedule 9 [1 of 1].

1		Where:			
2		ku = cost of equity for an all equity firm			
3		ke = market determined cost equity			
4		i = cost of debt			
5		d = dividend rate on preferred stock			
6		D = debt ratio			
7		P = preferred stock ratio			
8		E = common equity ratio			
9					
10	Q.	ARE THERE FLAWS IN THE FORMULAS MR. MOUL USES IN HIS ANALYSIS?			
11	A.	Yes. The formulas employed by Mr. Moul do not appear anywhere in the research he cites.			
12		Also, the literature Mr. Moul cites does not espouse using even its native formulas in a DCF			
13		adjustment setting.			
14					
15	Q.	CAN THE FORMULA SHOWN IN EXHIBIT PRM-1, SCHEDULE 9 AND PAGE 31			
16		OF THIS TESTIMONY BE FOUND IN THE MODIGLIANI & MILLER			
17		LITERATURE?			
18	A.	No, it cannot.			
19					
20	Q.	IS THE MODIGLIANI AND MILLER RESEARCH ON THE SUBJECT OF			
21		CAPITAL STRUCTURE AND COST OF CAPITAL THAT MR. MOUL HAS CITED			
22		AS JUSTIFICATION FOR HIS LEVERAGE ADJUSTMENT APPROPRIATE?			
	Direc	Direct Testimony of Emily Sears August 2016			

1	A.	No. Mr. Moul has misinterpreted Modigliani and Miller's theory and used it in a way the
2		researchers never advocated. Modigliani and Miller's research is primarily to understand
3		company capital investment behavior, not Mr. Moul's claimed financial risk associated with
4		a stock's market price diverging from its book value. Also, the adjustment and formula
5		employed by Mr. Moul cannot be found in the research he cites.
6		
7	Q.	EXPLAIN FURTHER WHAT THE WORK OF MODIGLIANI AND MILLER
8		STATES ABOUT THE EFFECT OF THE TYPE OF CAPITAL EMPLOYED (DEBT
9		OR EQUITY) ON THE VALUE OF THE FIRM.
10	A.	The work of Modigliani and Miller actually points to the opposite conclusion of Mr. Moul:
11		That is, the market value of any firm is independent of its capital
12		structure. <sup>24</sup>
13		Furthermore,
14		the value of any firm must be independent of its financial
15		structure. <sup>25</sup>
16		
17	Q.	ARE YOU AWARE OF ANY OTHER ACADEMIC LITERATURE THAT
18		SUPPORTS MR. MOUL'S "LEVERAGE ADJUSTMENT"?

Modigliani, Franco and Miller, Merton H. "The Cost of Capital, Corporation Finance, and the Theory of Investment" American Economic Review, June 1958, p. 268.

Modigliani, Franco and Miller, Merton H. "The Cost of Capital, Corporation Finance, and the Theory of Investment: Reply" American Economic Review, June 1965, p. 525.

A.	No. I am not aware of any other academic literature that supports Mr. Moul's 'leverage
	adjustment.
Q.	PLEASE SUMMARIZE YOUR RECOMMENDATION REGARDING THE
	LEVERAGE ADJUSTMENT
A.	I recommend the rejection of the leverage adjustment because there is no academic support
	for such an adjustment in a DCF setting, the PA PUC precedent does not unequivocally
	support its use, and true financial risk is a function of the amount of interest expense.
Q.	WHAT IS MR. MOUL'S DCF PRIOR TO HIS ADJUSTMENTS?
A.	Mr. Moul's DCF. using the 6.00% growth, plus the 2.91% dividend yield, equals 8.91%
	This figure supports the reasonableness of Staff's DCF.
, <b>Q.</b>	DO YOU HAVE ANY COMMENTS REGARDING MR. MOUL'S DCF PRIOR TO
	ADJUSTMENTS?
A.	Yes. Using all of Mr. Moul's adjustments simply inflates his DCF calculation by 98 basis
	points (9.89%-8.91% = 0.98%).
E	. INFLATED CAPM BETAS
Q.	WHAT BETA HAS MR. MOUL USED IN HIS CAPM ANALYSIS?
A.	Mr. Moul uses an inflated beta equal to 0.84.
Direc	t Testimony of Emily Sears August 2016

0.	HOW	HAS I	MR.	MOUL	INFLATED	THE	<b>BETAS</b>	<b>EMPLOYED</b>	IN	HIS	CAPM

#### 2 ANALYSIS?

A. Mr. Moul has used the same logic for inflating his CAPM betas that he used to enhance his

DCF returns, through a financial risk, or leverage, adjustment. Such enhancements are

unwarranted for beta in a CAPM analysis for the same reasons that enhancements are

unwarranted for DCF results. Also, if the unadjusted Value Line betas do not reflect an

accurate investment risk, as Mr. Moul contends, the question naturally arises as to why Value

Line does not publish betas that are adjusted for leverage. Until this type of adjustment is

demonstrated in the academic literature to be valid, such leverage adjusted betas in a CAPM

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### F. SIZE ADJUSTMENT

# 13 Q. WHAT IS MR. MOUL'S SIZE ADJUSTMENT?

model should be appropriately rejected.

14 A. Mr. Moul makes a 110 basis point adjustment because he believes as the size of a firm
15 decreases, its risk and required return increases. Further, Mr. Moul uses the SBBI Yearbook
16 to argue that the returns for stocks in lower deciles had returns in excess of those shown by
17 the simple CAPM.<sup>27</sup>

18

# 19 Q. WHAT COMMENTS DO YOU HAVE REGARDING MR. MOUL'S SIZE

<sup>&</sup>lt;sup>26</sup> Direct Testimony of Paul R. Moul, pages 42-43.

<sup>&</sup>lt;sup>27</sup> Direct Testimony of Paul R. Moul page 46.

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_					9 <b>3 3</b> 1			

A.

First, although the scale of operations for water utility distribution systems can vary, the basic nature of a water utility's business does not change with respect to scale. A water utility's core business is to provide water to its customers, regardless of size. Therefore, it must construct and maintain its distribution system, provide administrative functions, treat the water, etc. This business model remains essentially the same for any size utility, along with the fact that water utilities operate as monopolies with a captive customer base in the areas they serve.

Second, water utilities are regulated, and the utility's earnings are set by the ratemaking process. The utilities are also subject to regulatory oversight.

Finally, while Mr. Moul presented numerous articles regarding the size premium, none are specific to the utility industry. However, there are articles examining the size premium in the utility industry. Wallace Davidson states:

[O]ur results suggest that neither large nor small utilities merit a premium because of their size. The implications of our findings for regulatory officials for regulatory accounting standard-setters are straightforward: we find no evidence among the electric utility industry. .to suggest that a utility's cost of capital or its allowable ARR should be adjusted to reflect firm size.<sup>28</sup>

In research also specific to public utilities, Professor Annie Wong states:

[G]iven firm size, utility stocks are consistently less risky than industrial stocks. Second, industrial betas tend to decrease with firm size, but utility betas do not. These findings may be attributed to the fact that all public utilities operate in an environment with regional monopolistic power and regulated financial structure.

Wallace Davidson III, Kenneth Ferris, and William Reichenstein, <u>A Note on the Relationship Between Firm Size</u> and Return in the Electric Utility Industry, *Journal of Accounting, Auditing, and Finance* Vol. 8, Issue 3 (Summer 1993).

1 As a result, the business and financial risks are very similar among the utilities 2 regardless of their size. Therefore, utility betas would not necessarily be related 3 to firm size. 4 5 She then concludes: 6 The object of this study is to examine if the size effect exists in the utility industry. 7 After controlling for equity values, there is some weak evidence that firm size is a missing factor from the CAPM for industrial but not utility stocks. This implies 8 9 that although the size phenomenon has been strongly documented for industrials, 10 findings suggest that there is no need to adjust for the firm size in utility regulation.<sup>29</sup> 11 12 13 For all these reasons, I have not included a size premium in this case, and Mr. Moul's size 14 adjustment should be rejected. 15 16 0. WHAT WOULD MR. MOUL'S CAPM RESULT BE WITHOUT HIS 17 **ADJUSTMENTS?** Mr. Moul's CAPM using the average beta of 0.71 reported by Value Line, and removing the 18 Α. 19 size adjustment would equal 8.89% (3.75%+0.71(7.24%)). This result is comparable to 20 Staff's DCF of 8.85%, confirming the reasonableness of Staff's recommended return on 21 equity. 22 DO YOU HAVE ANY COMMENTS REGARDING MR. MOUL'S CAPM PRIOR TO 23 О. 24 ADJUSTMENTS?

<sup>&</sup>lt;sup>29</sup> Annie Wong, <u>Utility Stocks and the Size Effect: An Empirical Analysis</u>, *Journal of the Midwest Finance Association* (1993), p.98.

1	Ā.	Yes. Using Mr. Moul's adjustments simply inflates his CAPM calculation by 204 basis
` 2		points (10.93% 8.89%=2.04%).
3		
4	XI.	FUNDAMENTAL RISK ANALYSIS
5	Q.	PLEASE SUMMARIZE MR. MOUL'S TESTIMONY REGARDING FINANCIAL
6		DATA COMPARISON FOR MONARCH AND HIS BAROMETER GROUP.
7	A.	Mr. Moul discusses several categories of risk including bond ratings, size, market ratios,
8		common equity ratio, return on equity, operating ratios, coverage, quality of earnings,
9		internally generated funds, and betas.30 Mr. Moul compares Monarch, the Water Group,
10		and the S&P Public Utilities. Mr. Moul concludes that the 'risk of Monarch is vastly greater
11		than that of the Water Group. '31'
12		
13	Q.	DO YOU AGREE WITH MR. MOUL'S COMPARISON OF THE WATER GROUP
14		TO THE S&P PUBLIC UTILITIES?
15	A.	No. The S&P Public Utilities index is comprised of electric power and natural gas
16		companies. These are not comparable to the water distribution utility industry.
17		
18	Q.	WHAT COMMENTS DO YOU HAVE REGARDING MR. MOUL'S TESTIMONY
19		ABOUT SIZE?

Direct Testimony of Paul R. Moul, pages 15-19.
 Direct Testimony of Paul R. Moul, page 19, line 8.

Mr. Moul discusses size on page 15 of the Direct Testimony of Paul R. Moul. I have 1 Α. 2 previously discussed why size is not a factor in this proceeding on pages 36-37 of this 3 testimony. 4 5 WHAT COMMENTS DO YOU HAVE REGARDING MARKET RATIOS? Q. Mr. Moul discusses dividend yields, and market-to-book ratios. 32 Since dividend yields are 6 A. 7 already included in the DCF, there is no need to make additional risk analysis based on this 8 information. 9 WHAT COMMENTS DO YOU HAVE REGARDING COMMON EQUITY RATIOS? 10 0. Mr. Moul states that the use of a hypothetical capital structure aligns the financial risk of 11 A. 12 Monarch with the water group. However, the Company's 60.5% equity ratio is higher than 13 the 51.3% equity ratio for the Water group, making Monarch less risky than the barometer 14 / group. 15 16 WHAT COMMENTS DO YOU HAVE REGARDING MR. MOUL'S TESTIMONY Q. 17 ABOUT RETURN ON BOOK EQUITY, OPERATING RATIOS, AND COVERAGE? 18 A. Mr. Moul testifies that Monarch has higher earnings variability than his water group, 19 meaning Monarch has greater risk. Mr. Moul states that Monarch's coefficient of variation 20 is 1.541, while the Water Group is 0.083. Mr. Moul further claims that Monarch has

<sup>&</sup>lt;sup>32</sup> Direct testimony of Paul R. Moul, pages 15-16.

experienced losses during four of the last five years. Mr. Moul states that Monarch's high operating ratio can be traced to very low, or in some years negative operating margins, and that Monarch was unable to cover its interest expense from operations.<sup>33</sup> Monarch's last rate case, which settled, was in 2013. That would mean that Monarch settled on rates that were less than its required cost of service, and therefore, the experienced losses were the result of rates that Monarch supported as reasonable in settlement. The return in this case is sufficient for Monarch to have the opportunity to earn a fair and reasonable overall return under efficient and economical management.

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# Q. WHAT COMMENTS DO YOU HAVE REGARDING MR. MOUL'S STATEMENTS

# ABOUT INTERNALLY GENERATED FUNDS?

12 A. Mr. Moul indicates that the percentage of internally generated funds to capital expenditures
13 for Monarch was 109.7%, while the Water Group was only 81.6%.<sup>34</sup> This shows that
14 Monarch generates more funds than it spends on capital expenditures, while the Water group
15 generates less than it spends on capital expenditures, making Monarch less risky than the
16 barometer group.

17

18

# Q. DO YOU AGREE WITH MR. MOUL'S COMMENTS REGARDING MONARCH'S

#### 19 RISK COMPARED TO THE WATER GROUP?

<sup>&</sup>lt;sup>33</sup> Direct Testimony of Paul R. Moul, page 17.

<sup>&</sup>lt;sup>34</sup> Direct Testimony of Paul R. Moul, page 18.

1	Ā.	No. I believe that with the capital structure adjustment, and the offsetting risks Mr. Moul
2		discusses, that Monarch is in-line with the risks of the barometer group, and no additional
3		changes need to be made to the cost of equity.
4		
5	XII.	SUMMARY
6	Q.	WHAT IS STAFF'S RECOMMENDED RETURN ON EQUITY?
7	A.	Staff recommends a return on equity of 8.48%.
8		
9	Q.	WHAT IS STAFF'S OVERALL RECOMMENDED RETURN?
10	A.	Staff recommends an overall rate of return, to be applied to rate base, of 7.47%.
11.		
12	Q.	DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
13	A.	Yes. I reserve the right to supplement this testimony during the course of the proceeding
14		as new evidence is presented.

# **Emily Sears**

# Professional Experience

• Public Utility Commission of Texas

Utility Rates Analyst Water Utilities Division January 2015 Present

Commonwealth of Pennsylvania, Public Utility Commission

Fixed Utility Financial Analyst Bureau of Investigation and Enforcement May 2009 – December 2014

Commonwealth of Pennsylvania, Public Utility Commission

Fixed Utility Financial Analyst Bureau of Fixed Utility Services April 2008 – May 2009

• Nationwide Insurance Company

Personal Lines Underwriting Screener October 2004 – May 2007

# Education

University of Pittsburgh, College of Business Administration
 Bachelors of Science in Business Administration
 Major – Finance
 August 2004

Annual Regulatory Studies Program: Camp NARUC

Week 1-Introduction to Regulation August 2008

- Pennsylvania Public Utility Commission Rate Case Training December 2008
- Society of Utility and Regulatory Financial Analysts
   Certified Rate of Return Analyst
   June 2010

#### Presentations

 Pennsylvania Public Utility Commission Rate Case Training Presented on Rate of Return/Return on Equity October 2012, September 2014

#### **TESTIMONY SUBMITTED:**

I have testified and/or submitted testimony in the following proceedings before the Pennsylvania Public Utility Commission:

- Duquesne Light Company, Docket No. M-2009-2093217
- West Penn Power Company d/b/a Allegheny Power, Docket No. M-2009-2093218
- Duquesne Light Company, Docket No. M-2009-2123948
- West Penn Power Company d/b/a Allegheny Power, Docket No. M-2009-2123951
- Utilities, Inc. Westgate, Docket No. R-2009-2117389
- Utilities, Inc. of Pennsylvania, Docket No. R-2009-2117402
- PECO Energy Company Electric Division, Docket No. P-2009-2143607
- PECO Energy Company Gas Division, Docket No. P-2009-2143588
- Philadelphia Gas Works, Docket No. R-2009-2139884
- York Water Company, Docket No. R-2010-2157140
- City of Lancaster, Docket No. R-2010-2179103
- Columbia Gas of Pennsylvania, Inc. Docket No. R-2010-2215623
- CMV Sewage, Inc. Docket No. R-2011-2218562
- Pennsylvania American Water Company, Docket No. R-2011-2232243
- UGI Penn Natural Gas, Docket No. R-2011-2238943
- Aqua Pennsylvania, Inc. Docket No. R-2011-2267958
- Equitable Gas Company, LLC, Docket No. R-2012-2287044
- Peoples Natural Gas Company, LLC, Docket No. R-2012-2285985
- PPL Electric Utilities Corporation, Docket No. R-2012-2290597
- Columbia Gas of Pennsylvania, Inc. Docket No. R- 2012-2321748
- The City of Lancaster Sewer Fund, Docket No. R-2012-2310366
- Columbia Gas of Pennsylvania, Inc. Docket No. R-2012-2321748 and M-2012-2323645
- UGI Penn Natural Gas, Docket No. R-2013-2361763
- City of DuBois Bureau of Water, Docket No. R-2013-2350509
- Pennsylvania-American Water Company, Docket No. R-2013-2355276
- Duquesne Light Company, Docket No. R-2013-2372129
- Pike County Light and Power Company, Gas Division, Docket No. R-2013-2397353
- Pike County Light and Power Company, Electric Division, Docket No. R-2013-2397237
- UGI Penn Natural Gas, Docket No. R-2014-2420273
- Emporium Water Company, Docket No. R-2014-2402324
- City of Lancaster Water Fund, Docket No. R-2014-2418872
- Peoples TWP, LLC, R-2014-2429613
- Peoples Natural Gas Company, LLC, R-2014-2429606

I have testified and/or submitted testimony in the following proceedings before the Public Utility Commission of Texas and the Texas State Office of Administrative Hearings:

• City of Austin water rate appeal, Docket No. 42857

# Attachment ES-2

- City of Austin wastewater rate appeal, Docket No. 42867
- Quadvest, L.P. Docket No. 44809
- Consumers Water, Inc. Docket No. 43076

ES-3 Page 1 of 2

# Summary of Cost of Capital

Type of Capital	Ratio	Cost Rate	Weighted Cost
Long term Debt	47.37%	6.36%	3.01%
Common Equity	52.63%	8.48%	4.46%
Total	100%		7.48%

ES-3 Page 2 of 2

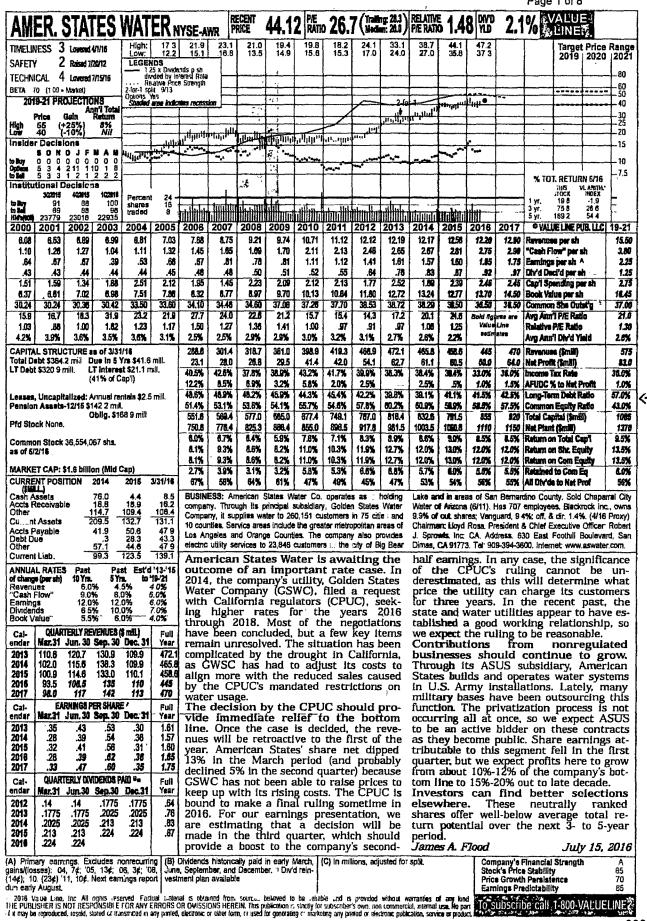
	2015	2014	2013	2012	2011	2010
Type of Capital	Ratio	Ratio	Ratio	Ratio	Ratio	Ratio
American States Water Co						
Long term Debt	41.10%	39.10%	39.80%	42.20%	45.40%	44.30%
Common Equity	58.90%	60.90%	60.20%	57.80%	54.60%	55.70%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
American Water Works						
Long term Debt	53.80%	52.60%	52.40%	53.90%	55.80%	56.80%
Common Equity	46.20%	47.40%	47.60%	46.10%	44.20%	43.20%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Aqua America						
Long term Debt	50.30%	48.50%	48.90%	52.70%	52.70%	56.60%
Common Equity	49.70%	51.50%	51.10%	47.30%	47.30%	43.40%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
California Water Service Group						
Long term Debt	44.40%	40.10%	41.60%	47.80%	51.70%	52.40%
Common Equity	55.60%	59.90%	58.40%	52.20%	48.30%	47.60%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Connecticut Water Service						
Long term Debt	44.20%	45.90%	47.10%	49.20%	53.50%	49.80%
Common Equity	55.80%	54.10%	52.90%	50.80%	46.50%	50.20%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Middlesex Water						
Long term Debt	40.20%	41.20%	41.30%	42.60%	43.40%	44.20%
Common Equity	59.80%	58.80%	58.70%	57.40%	56.60%	55.80%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
SJW Corp.						
Long term Debt	49.80%	51.60%	51.10%	55.00%	56.60%	53.70%
Common Equity	50.20%	48.40%	48.90%	45.00%	43.40%	46.30%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
York Water						
Long term Debt	44.50%	44.80%	45.10%	46.00%	47.10%	48.30%
Common Equity	55.50%	55.20%	54.90%	54.00%	52.90%	51.70%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

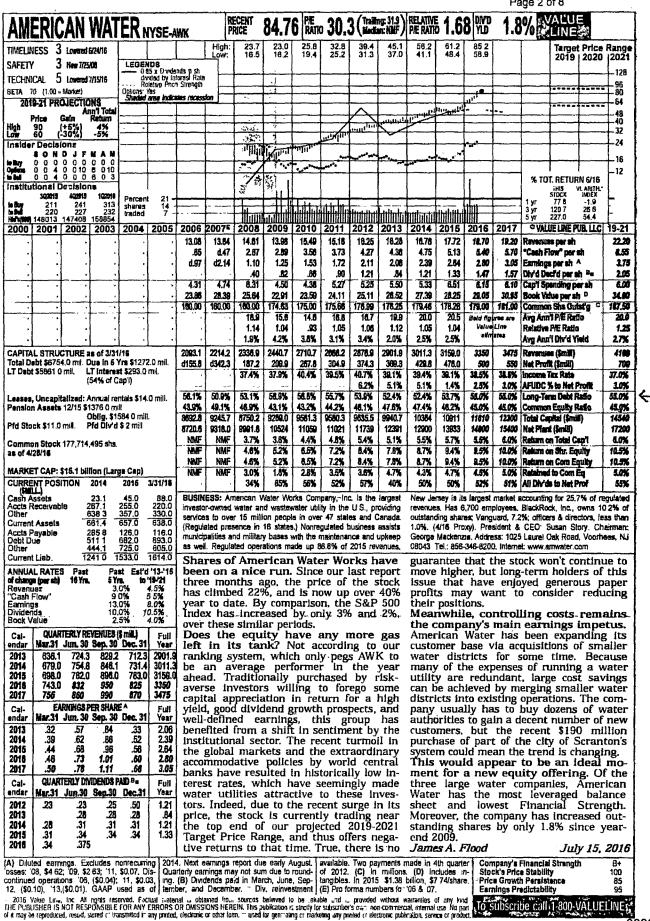
 5 Year Average

 Long term Debt
 47.375%
 48.32%

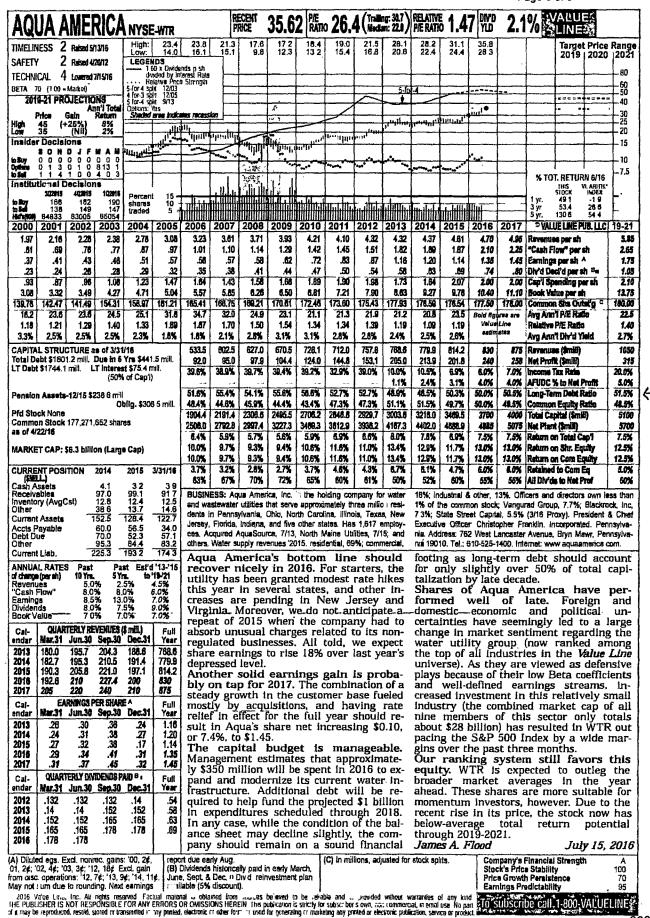
 Common Equity
 52.625%
 51.68%

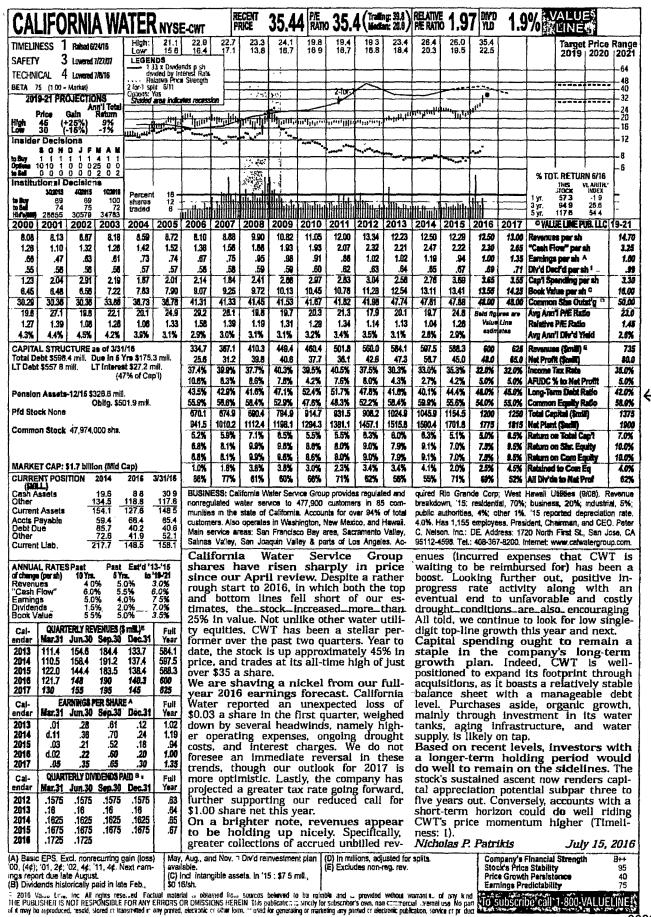
Source: Value Line

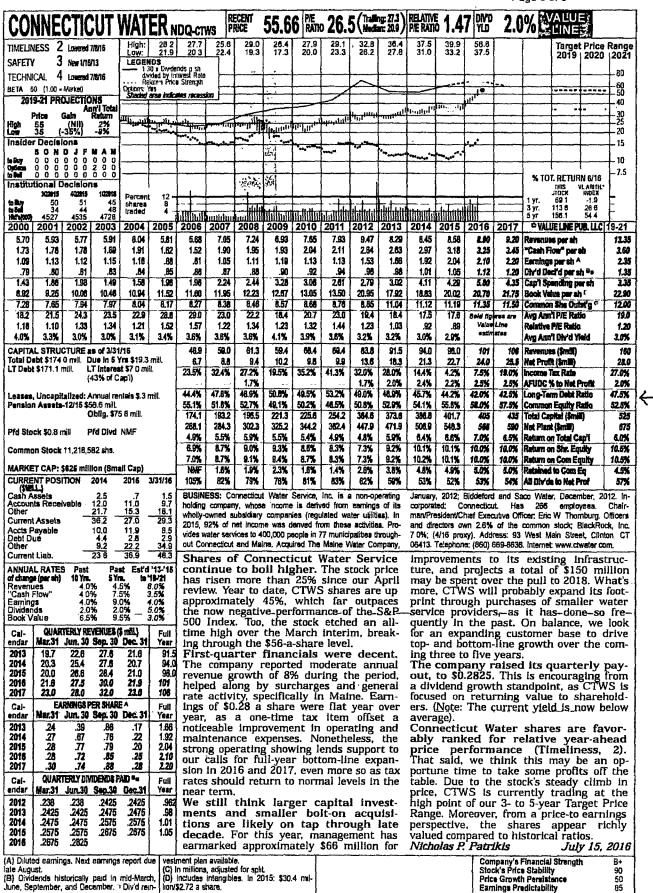




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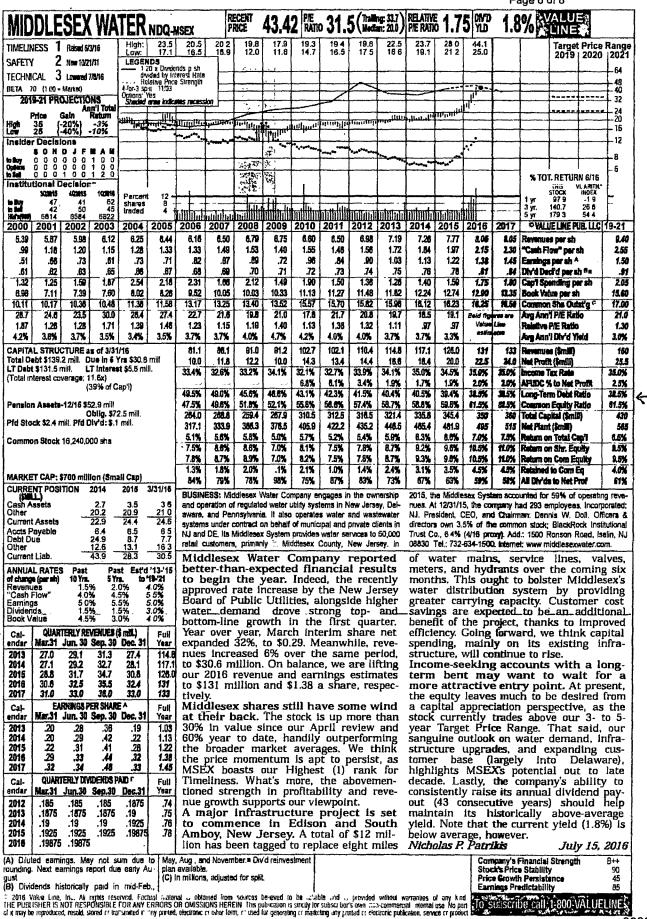


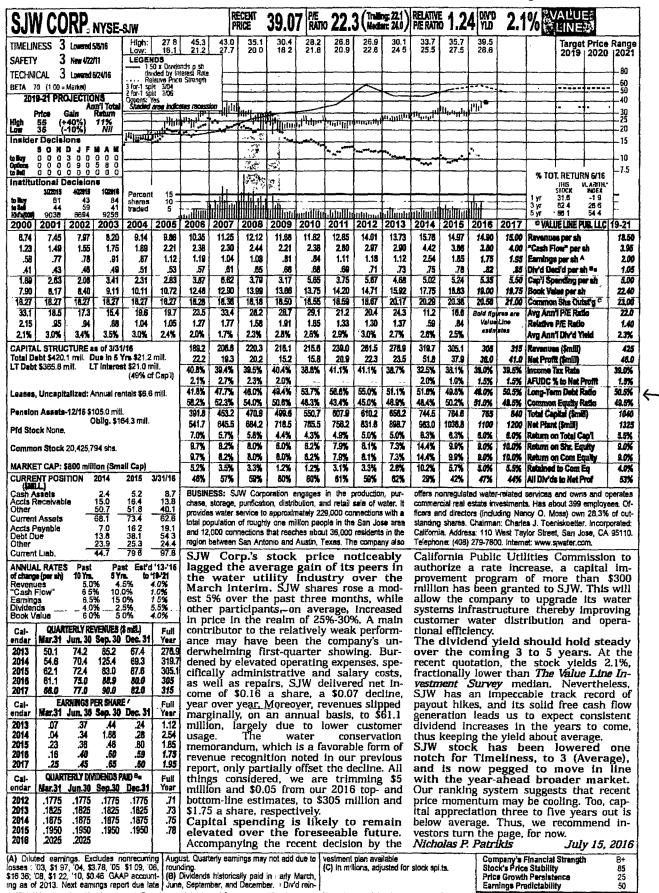


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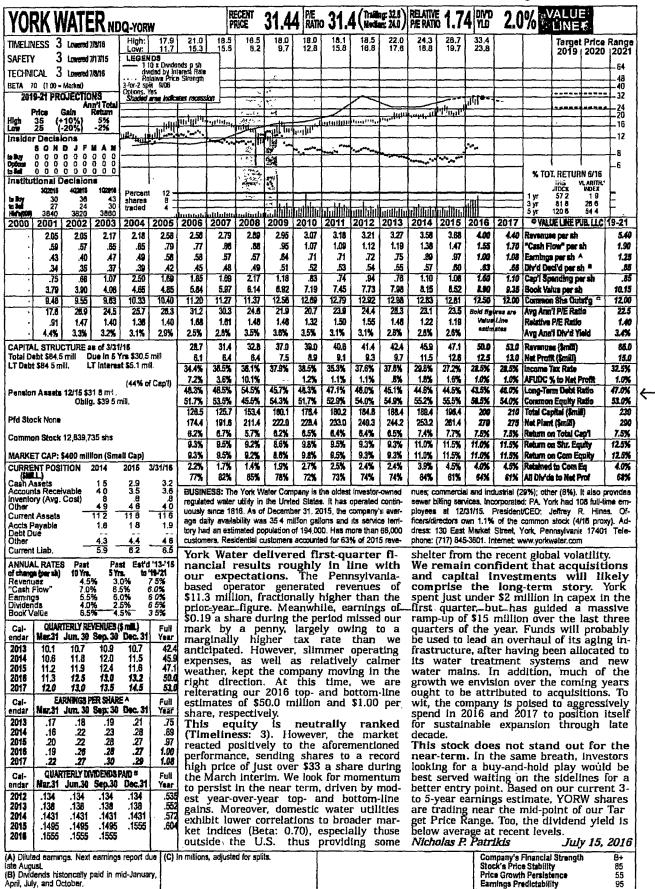


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TO SUDSCRIBE CALL TO SUDSCRIBE CALL

Earnings Predictability 50



	Average	American States Water Co	American Water Works	Aqua America	California Water Service Groun	Connecticut Water Sepulce	Mind and a second second	Cita	
Symbol		AWR	AWK	WTR	CWT	CTWS	MSFX	S. IM	York Water
Div 52 wk low 52 wk high Spot Price Spot Div Yield 52 wk Div Yield Average	2.16% 2.51% 2.34%	0.97 35.80 47.24 43.42 2.23 2.34 2.34	1.57 50.16 85.24 81.59 1.92 2.32 2.12%	0.80 24.45 35.83 34.03 2.35 2.35 2.56	0.71 19.55 35.62 33.01 2.15 2.15 2.25 7.45%	1.20 33.15 56.62 51.98 2.23 2.63	0.84 22.12 44.11 41.58 2.02 2.02 2.54	0.85 27.54 39.48 39.34 2.16 2.54	0.66 19.69 33.40 31.26 2.11 2.49
Source:	Barrons Value Line	July 18, 2016 July 15, 2016				6, 21.3	6.2576	2.35%	2.30%

Five Year Growth Estim	ate Foreca	ast for Eigh	t Compai	ny Baron	eter Gro	up
Company	Symbol	Yahoo! Finance	Zacks	oorning star	Value Line	Average
Company	Oymboi			<u>oodice</u>		
American States Water Co	AWR	3.85%	3.80%	N/A	6.00%	4.55%
American Water Works	AWK	7.27%	7.20%	6.50%	8.00%	7.24%
Aqua America	WTR	6.05%	6.30%	N/A	7.00%	6.45%
California Water Service Group	CWT	9.05%	9.10%	N/A	7.50%	8.55%
Connecticut Water Service	CTWS	6.00%	6.00%	N/A <sup>2</sup>	4.00%	5.33%
Middlesex Water	MSEX	2.70%	N/A	N/A	5.00%	3.85%
SJW Corp.	SJW	14.00%	N/A	N/A	1.50%	7.75%
York Water	YORW	4.90%	N/A	N/A	6.00%	5.45%
			<u></u>			6.15%

Source: Internet

July 18, 2016

)-

# **Expected Market Cost Rate of Equity**

# Using Data for the Barometer Group of Eight Water Companies 5 Year Forecasted Growth Rates

	Time Period	Adjusted Dividend Yield(1) (1)	Growth Rate (2)	Expected Rate of Return (3=1+2)
(1)	52 Week Average Ending: July 18, 2016	2.51%	6.15%	8. <b>66%</b>
(2)	Spot Price Ending: July 18, 2016	2.16%	6.15%	8.30%
(3)	Average:	2.34%	6.15%	8.48%
Sources	· Value Line July 15, 2016			

Sources: Value Line July 15, 2016 Barrons July 18, 2016

# ES-8

Company	<u>Beta</u>
American States Water Co	0.70
American Water Works	0.70
Aqua America	0.70
California Water Service Group	0.75
Connecticut Water Service	0.60
Middlesex Water	0.70
SJW Corp.	. 0.70
York Water	0.70
Average beta for CAPM	0.69

Source: Value Line

Attachment ES -9 Page 1 of 2

)

# Forecasted Risk Free Rate

Treasury note 10-yr Note	Yield
•	
2Q 2016	1.84
3Q 2016	1.80
4Q 2016	2.00
1Q 2017	2.20
2Q 2017	2.30
3Q 2017	2.50
4Q 2017	2.70
2018-2022	3.80
Average	2.39

Source: Blue Chip

June 1, 2016

# Attachment ES-9 Page 2 of 2

Historic Risk Free Rate	Yield
61 years	5.94
40 years	6.58
20 years	4.15
10 years	3.11
5 years	2.32
Average	4.42

# Source:

Federal Reserve Board H.15 Release

https://www.federalreserve.gov/releases/h15/data.htm

ES-10 Page1of 2

# Required Rate of Return on Market as a Whole Forecasted

	Dividend <u>Yield</u>	+	Growth Rate	=	Expected Market <u>Return</u>
Value Line Estimate	2.30%		9.73%	(a)	12.03%
S&P 500	2.22%	(b)	8.80%		11.02%
Average Expected Marke	t Return			= -	11.53%

<sup>(</sup>a)  $((1+0.45)^{2.5} \cdot 1)$  Value Line forecast for the 3 to 5 year index appreciation is 45% (b) S&P 500 multiplied by half the growth rate

ES-10 Page 2 of 2

# Required Rate of Return on Market as a Whole Historic

	Expected Market <u>Return</u>
5 yr S&P Composite Index Historical Return	12.57%
10 yr S&P Composite Index Historical Return	7.30%
20 yr S&P Composite Index Historical Return	8.19%
40 yr S&P Composite Index Historical Return	11.34%
85 yr S&P Composite Index Historical Return	10.02%
Average Expected Market Return =	9.88%

ES-11 Page 1 of 2

	CAPM with forecasted return
Re	Required return on individual equity security
Rf	Risk-free rate
Rm	Required return on the market as a whole
Be	Beta on individual equity security
Re =	Rf+Be(Rm-Rf)
Rf =	2.3925
Rm =	11.5290
Be =	0.6938

8.73

Sources: Value Line July 15, 2016 Blue Chip March 1, 2016 ES-10, Page 1 of 2

Re =

ES-11 Page 2 of 2

# CAPM with historical return

Re	Required return on individual equity security
Rf	Risk-free rate
Rm	Required return on the market as a whole
Be	Beta on individual equity security
Re =	Rf+Be(Rm-Rf)
Rf =	4.4384
Rm =	9.8842
Be =	0.6938
Re =	8.22

Sources: Value Line July 15, 2016 Blue Chip March 1, 2016 ES-10, Page 2 of 2

# PUC DOCKET NO. 45570 SOAH DOCKET NO. 473-16-2873.WS

# MONARCH'S RESPONSES TO STAFF'S THIRD REQUESTS FOR INFORMATION

STAFF RFI 3-12: Reference Schedule PRM-13. Provide this schedule using the most

recent, up-to-date Value Line information.

RESPONSE: Please see Attachment Staff 3-12.

Prepared by: Paul R. Moul Sponsored by: Paul R. Moul

Altachment Staff 3-12

# Comparable Earnings Approach Five -Year Average Historical Earned Returns for Years 2011-2016 and Projected 3-5 Year Returns

Company	2011	2012	2013	2014	2015	Average	Projected 2019-21
Altria Group Inc	92.1%	NMF	NMF	NMF	NMF	92.1%	NMF
Capitol Federal Financial Inc	3.3%	4.1%	4.2%	5.2%	5.5%	4.5%	6.0%
Forrester Research Inc	10.1%	8.6%	9.7%	13.2%	15.8%	11.5%	16.0%
Hershey Company	76.4%	71.4%	52.6%	61.6%	71.0%	66.6%	42.0%
Mercury General Corp	8.2%	6.3%	8.6%	8.7%	7.1%	7.0%	12.0%
Northwest Bancshares Inc	5.6%	5.6%	5 8%	5.8%	5.2%	5.6%	8.0%
Verisk Analytics Inc		NMF	NMF	NMF	35.5%	35.5%	17.5%
Mean						31.8%	16.9%
Median						11.5%	14.0%
Average (excluding values	<8% and >20%)	ĺ				11.5%	13.4%

# PUC DOCKET NO. 45570 SOAH DOCKET NO. 473-16-2873.WS

# MONARCH'S RESPONSES TO STAFF'S THIRD REQUESTS FOR INFORMATION

STAFF RFI 3-15: Reference the Direct Testimony of Paul R. Moul, page 50, lines 1-11. Provide the following:

- a. The reasoning for using 20% as the cut off for a high return;
- b. The reasoning for using 8% as the cut off for a low return; and
- c. Any documents in Monarch's or Mr. Moul's possession showing the average state commission-granted return on common equity during any of the last 5 years for any utility and specify the commission and the industry.

### **RESPONSE:**

- a. It is Mr. Moul's opinion that returns above 20% would constitute those associated with highly profitable enterprises or speculative ventures.
- b. The reason that 8% was used to set the low end of the range of returns in the Comparable Earnings approach was to add symmetry to the range.
- c. Please see Attachment Staff 3-15.

Prepared by: Sponsored by: Paul R. Moul Paul R. Moul



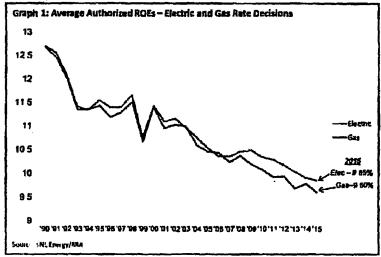
# Regulatory Research Associates

# REGULATORY FOCUS

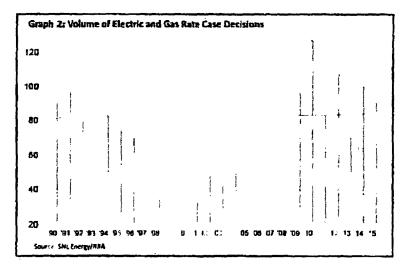
January 14, 2016

#### **MAJOR RATE CASE DECISIONS--CALENDAR 2015**

The average return on equity (ROE) authorized <u>electric</u> utilities was 9.85% in 2015, compared to 9.91% in 2014. There were 30 electric ROE determinations in 2015, versus 38 in 2014. We note that the data includes several surcharge/rider generation cases in Virginia that incorporate plant-specific ROE premiums. Virginia statutes authorize the State Corporation Commission to approve ROE premiums of up to 200 basis points for certain generation projects (see the <u>Virginia Commission Profile</u>). Excluding these Virginia surcharge/rider generation cases from the data, the average authorized electric ROE was 9.58% in 2015 compared to 9.76% in 2014. The average ROE authorized <u>oas</u> utilities was 9.6% in 2015 compared to 9.78% in 2014. There were 16 gas cases that included an ROE determination in 2015, versus 26 in 2014. The 2014 averages do not include a Feb. 20, 2014 New York Public Service Commission steam rate decision for Consolidated Edison Co. of New York that adopted a 9.3% ROE.



As shown in Graph 2 below, after reaching a low in the early-2000s, the number of rate case decisions for energy companies has generally increased over the last several years, peaking in 2010 at more than 125 cases.



**RRA-REGULATORY FOCUS** 

-2.

January 14, 2016

Since 2010, the number of cases has moderated somewhat but has approximated 90 or more in the last five calendar years. There were 89 electric and gas rate cases resolved in 2015, 99 in both 2014 and 2013, 110 in 2012, and 86 in 2011. The number of rate cases decided in 2015 declined slightly from the level of activity in 2014, but this level remains robust compared to the late-1990s/early-2000s. Increased costs for environmental compliance (including the CO<sub>2</sub> reduction mandates), generation and delivery infrastructure upgrades and expansion, renewable generation mandates, and employee benefits argue for the continuation of an active rate case agenda over the next few years. In addition, if the Federal Reserve continues its policy initiated in December 2015 to gradually raise the federal funds rate, utilities eventually would face higher capital costs and would need to initiate rate cases to reflect the higher capital costs in rates.

We note that this report utilizes the simple mean for the return averages. In addition, the average equity returns indicated in this report reflect the cases decided in the specified time periods and are not necessarily representative of the returns actually earned by utilities industry wide.

As a result of electric industry restructuring, certain states unbundled electric rates and implemented retail competition for generation. Commissions in those states now have jurisdiction only over the revenue requirement and return parameters for delivery operations (which we footnote in our chronology beginning on page 5), thus complicating historical data comparability. We note that since 2008, interest rates declined significantly, and average authorized ROEs have declined modestly. We also note the increased utilization of limited issue rider proceedings that allow utilities to recover certain costs outside of a general rate case and typically incorporate previously-determined return parameters.

The table on page 3 shows the average ROE authorized in major electric and gas rate decisions annually since 1990, and by quarter since 2011, followed by the number of observations in each period. The tables on page 4 indicate the composite electric and gas industry data for all major cases summarized annually since 2001 and by quarter for the past eight quarters. The individual electric and gas cases decided in 2015 are listed on pages 5-9, with the decision date shown first, followed by the company name, the abbreviation for the state issuing the decision, the authorized rate of return (ROR), ROE, and percentage of common equity in the adopted capital structure. Next we indicate the month and year in which the adopted test year ended, whether the commission utilized an average or a year-end rate base, and the amount of the permanent rate change authorized. The dollar amounts represent the permanent rate change ordered at the time decisions were rendered. Fuel adjustment clause rate changes are not reflected in this study.

The table below tracks the average equity return authorized for all electric and gas rate cases combined, by year, for the last 26 years. As the table indicates, since 1990 the authorized ROEs have generally trended downward, reflecting the significant decline in interest rates and capital costs that has occurred over this time frame. The combined average equity returns authorized for electric and gas utilities in each of the years 1990 through 2015, and the number of observations for each year are as follows:

1990	12.69%	(75)	2003	10.98%	(47)
1991	12.51	(80)	2004	10.67	(39)
1992	12.06	(77)	2005	10.50	(55)
1993	11.37	(77)	2 <b>006</b>	10.39	(42)
1994	11.34	(59)	2007	10.30	(76)
1995	11.51	(49)	2008	10.42	(67)
1996	11.29	(42)	2009	10.36	(68)
1997	11.34	(24)	2010	10.28	(100)
1998	11.59	(20)	2011	10,21	(59)
1999	10.74	(29)	2012	10.08	(93)
2000	11.41	(24)	2013	9.92	(71)
2001	11.05	(25)	2014	9,86	(63)
2002	11.10	(43)	2015	9.76	(46)

Please note: Historical data provided in this report may not match data provided on RRA's website due to certain differences in presentation.—

#### Dennis Sperduto

 RRA-REGULATORY FOCUS

-3

January 14, 2015

#### Average Equity Returns Authorized Issuary 1990 - December 2015

		Electric Utilities	s Gas Utilities
Year	Period	ROE % (# Casi	
1990	Full Year	12.70 (44)	12.67 (31)
1991	Full Year	12.55 (45)	12.46 (35)
1992	Full Year	12.09 (48)	12.01 (29)
1993	Full Year	11.41 (32)	11.35 (45)
1994	Full Year	11.34 (31)	11.35 (28)
1995	Full Year	11.55 (33)	11.43 (16)
1995	Full Year	11.39 (22)	11.19 (20)
1997	Full Year	11.40 (11)	11.29 (L3)
1998	Full Year	11.66 (1D)	11.51 (10)
1999	Full Year	10.77 (20)	10.66 (9)
2000	Full Year	11.43 (12)	11.39 (12)
2001	Full Year	11.09 (18)	10.95 (7)
2002	Full Year	11.16 (22)	11.03 (21)
2003	Full Year	10.97 (22)	10.99 (25)
2004	Full Year	10.75 (19)	10.59 (20)
2005	Full Year	10.54 (29)	10.46 (25)
2005	Full Year	10.36 (26)	10.43 (16)
2007	Full Year	10.36 (39)	10.24 (37)
2008	Full Year	10.46 (37)	10,37 (30)
2009	Full Year	10.48 (39)	10.19 (29)
2010	Full Year	10.37 (61)	10.15 (39)
		,	,,
	ist Quarter	10.32 (13)	10.10 (5)
	2nd Quarter	10.12 (10)	9.88 (5)
	3rd Quarter	10.36 (8)	9.65 (2)
	4th Quarter	10.34 (11)	9.88 (4)
2011	Full Year	10.29 (42)	9.92 (16)
		• •	<b>(-2-)</b>
	1st Quarter	10.84 (12)	9.63 (5)
	2nd Quarter	9.92 (13)	9.83 (8)
	3rd Quarter	9.78 (8)	9.75 (1)
	4th Quarter	10.10 (25)	10.07 (21)
2012	Full Year	10.17 (58)	9.94 (35)
	1st Quarter	10.28 (14)	9.57 (3)
	2nd Quarter	9.84' (7)	9.47 (5)
	3rd Quarter	10.06 (7)	9.50 (1)
	4th Quarter	9.91 (21)	9.83 (11)
2013	Full Year	10.03 (49)	9.68 (21)
	1st Quarter	10.23 (8)	9,54 (6)
	2nd Quarter	9,83 (5)	9.84 (8)
	3rd Quarter	9.87 (12)	9.45 (6)
	4th Quarter	9.78 (13)	10.28 (6)
2014	Fuil Year	9.91 (38)	9.78 (26)
	1st Quarter	10.37 (9)	9.47 (3)
	2nd Quarter	9.73 (7)	9.47 (3) 9.43 (3)
	3rd Quarter	9.40 (2)	
	4th Quarter	9.62 (12)	• •
2015	Year-to-Date	9.85 (30)	. 9.58 (9) 9.60 (16)
	1 June 104 - 17 at 12	(-W)	3.00 (10)

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Electric	Utilities-	-Summa	v Table

				•		Eq. as %		Amt	
	<u>Pariod</u>	ROR %	# Cases)	ROE % !	# Cases)	Cap. Struc. (	# Cases)	1 HIL	# Cases)
2001	Full Year	8.93	(15)	11.09	(18)	47.20	(13)	14.2	(21)
2002	Full Year	8.72	(20)	11.16	(22)	46.27	(19)	-475.4	(24)
2003	Full Year	8.86	(20)	10.97	(22)	49.41	(19)	313.8	(12)
2004	Full Year	5.44	(18)	:0.75	(19)	45.84	(17)	1,091.5	(30)
2005	Fu I Year	8.30	(26)	10 54	(29)	46.73	(27)	1,373.7	(36)
2006	Full Year	8.24	(24)	10.36	(26)	48.57	(23)	1,465.0	(42)
2007	Full Year	8.22	(38)	10.36	(39)	48,01	(37)	1,401.9	(46)
2008	Full Year	8.25	(35)	10.46	(37)	48.41	(33)	2,899.4	(42)
2009	Full Year	8.23	(38)	10,48	(39)	45.61	(37)	4,192.3	(58)
2010	Full Year	7.99	(59)	10.37	(61)	48.45	(54)	5,567.7	(77)
2011	Full Yéar	8.00	(43)	10.29	(42)	48.26	(42)	2,853.5	(55)
2012	Full Year	7 95	(51)	10.17	(58)	50.55	(52)	3,131.5	(69)
2013	Full Year	7.66	(45)	10.03	(49)	49.25	(43)	3,326.6	(61)
	1st Quarter	7,71	(6)	10,23	(8)	51.08	(8)	251.4	(9)
	2nd Quarter	7.77	(2)	9.83	(5)	49.12	(4)	92.5	(6)
	3rd Quarter	7.55	(11)	9.87	(12)	50.12	(11)	651.5	(16)
	4th Quarter	7,56	(13)	9.78	(13)	50.29	(12)	1,058.4	(20)
2014	Full Year	7.60	(32)	9.91	(36)	50.28	(35)	2,053.8	(51)
	1st Quarter	7.74	(10)	10.37	(9)	51.91	(9)	203.7	(11)
	2nd Quarter	7.04	(9)	9.73	(7)	47.83	(6)	819.4	(16)
	3rd Quarter	7.85	(3)	9.40	(2)	51.08	(3)	379.6	(5)
	4th Quarter	7.22	(13)	9.62	(12)	48.24	(12)	484.3	(19)
2015	Year-To-Date	7.38	(35)	9.85	(30)	49.54	(30)	1,887.0	(51)

# Gas Utilities—Summary Table

					Eq. as %			Amt.		
	<b>Period</b>	ROR % (4	Cases)	RDE %	# Cases	Cap. Struc. (	# Chies)	s.Mil. (	f.Cases)	
2001	Full Year	8.51	(6)	10.95	(7)	43.96	(5)	114.0	(11)	
2002	Full Year	8.80	(20)	11.03	(21)	48.29	(18)	303.6	(26)	
2003	Full Year	8.75	(22)	10.99	(25)	49.93	(22)	260.1	(30)	
2004	Full Year	8.34	(21)	10.59	(20)	45.90	(20)	303.5	(31)	
2005	Full Year	8.25	(29)	10.46	(26)	48.66	(24)	458.4	(34)	
2006	Full Year	8.51	(16)	10.43	(16)	47.43	(16)	444.0	(25)	
2007	Full Year	8.12	(32)	10.24	(37)	48.37	(30)	813.4	(48)	
2008	Fuli Year	8.48	(30)	10.37	(30)	50.47	(30)	884.8	(41)	
2009	Full Year	8.15	(28)	10.19	(29)	48.72	(28)	475.0	(37)	
2010	Full Year	7.95	(38)	10,15	(39)	49.56	(38)-	816.7	(50)	
2011	Full Year	8.09	(18)	9.92	(16)	52.49	(14)	436.3	(31)	
2012	Full Year	7.98	(30)	9.94	(35)	51.13	(32)	263.9	(41)	
2013	Full Year	7.39	(20)	9,68	(21)	50.60	(20)	494.9	(38)	
	1st Quarter	7.67	(6)	9.54	(6)	51.14	(6)	22.2	(9)	
	2nd Quarter	7.74	(7)	9.84	(8)	52.12	(8)	62.2	(12)	
	3rd Quarter	7.24	(7)	9.45	(6)	48,58	(7)	329.1	(11)	
	4th Quarter	7.97	(7)	10.28	(6)	52.35	(7)	115.5	(16)	
2014	Full Year	7.65	(27)	9.78	(25)	51.11	(28)	529.0	(48)	
	1st Quarter	6.41	(2)	9.47	(3)	50.41	(2)	168.7	(9)	
	2nd Quarter	7.29	(3)	, 9.43	(3)	50.71	(3)	34.9	(8)	
	3rd Quarter	7.35	(1)	9.75	(1)	42.01	(1)	103.9	(8)	
	4th Quarter	7.54	(10)	9.58	(9)	50.40	(10)	1.081	(13)	
2015	Year-To-Date	7.34	(16)	9.60	(16)	49.93	(16)	487.6	(38)	

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# ELECTRIC UTILITY DECISIONS

				Common	Test Year	
		ROR	ROE	Eq. as %	Ą	Amt.
Date	Company (State)	<u> </u>	_%_	Cap. Str.	Rate Base	s.Mil.
1/23/15	PacifiCorp (WY)	7.41	9.50	51.43	6/15-A	20.2
2/4/15	Monongahela Power/Potomac Ed. (WV)		**		12/13	124.3 (B,1)
2/18/15	Virginia Electric and Power (VA)	7.88	11.00	52.03	3/16-A	36.9 (LIR,8,2)
2/24/15	Public Service Co. of Colorado (CO)	7.55	9.83	56.00	12/13-YE	-39.4 (I,8)
3/2/15	Black Hills Power (SD)	7.75	_		9/13-A	6.9 (I,8)
3/12/15	Virginia Electric and Power (VA)	8.40	12.00	52.03	3/16-A	-6.4 (LIR,8,3)
3/12/15	Virginia Electric and Power (VA)	7.88	11.00	52.03	3/16-A	11.4 (LJR,B,4)
3/12/15	Virginia Electric and Power (VA)	7.88	11.00	52.03	3/16-A	5.6 (LIR,B,5)
3/18/15	Jersey Central Power & Light (NJ)	8.Q1	9.75	50.00 (Hy)	12/11-YE	-115.0 (D)
3/25/15	PacifiCorp (WA)	7.30	9.50	49.10 (Hy)	12/13-A	9.6
3/26/15	Northern States Power-Minnesota (MN)	7.37	9.72	52.50	12/14-A	149.4 (R,I,Z)
2015	1ST QUARTER: AVERAGES/TOTAL	7.74	10.37	51.91		203.7
	OBSERVATIONS	10	9	9		11
4/9/15	Metropolitan Edison (PA)	**		••	4/16	105.7 (D,8)
4/9/15	Pennsylvania Electric (PA)		-	***	4/16	107.8 (D,8)
4/9/15	Pennsylvama Power (PA)				4/16	25.5 (D,B)
4/9/15	West Penn Power (PA)			••	4/16	95.2 (D,8)
4/14/15	Public Service Oklahoma (OK)	7.63			7/13-YE	-4.8 (I,B)
4/21/15	Virginia Electric & Power (VA)	7.88	11.00	52.03	9/1 <del>6-</del> A	50 5 (LIR,Z,B,6)
4/23/15	Wisconsin Public Service (MI)	6.01	10.20		12/15	4.0 (Z,B)
4/29/15	Union Electric (MO)	7.60	9.53	51.76	3/14-YE	121.5
5/1/15	Cross Texas Transmission (TX)	6.11	9.60	40.00	9/14-YE	30.9 (8,D,7)
5/26/15	Appalachian Pow./Wheeling Pow. (WV)	7.38	9.75	47.15	12/13-A	123.5
6/15/15	Northern States Power-Minnesota (SD)	7.22			12/13-A	15.2 (I,B)
6/17/15	Central Hudson Gas & Electric (NY)	6.62	9.00	48.00	6/16-A	15.3 (D,B,8)
6/17/15	Consolidated Edison of New York (NY)	6.91	9.00	48.00	12/16-A	(D,B,9)
6/22/15	Kentucky Power (KY)	-			9/14	-23.0 (B)
6/24/15	Empire District Electric (MO)				4/14	17.1 (B)
6/30/15	Kentucky Utilities (KY)				6/16	125.0 (8)
6/30/15	Louisville Gas & Electric (KY)				-6/16	0.0 (8)
2015	2ND QUARTER: AVERAGES/TOTAL	7.04	9.73	47.83		819.4
	OBSERVATIONS	9	7	6		16
7/7/15	Mississippi Power (MS)					0.0 (LIR,10)
7/20/15	Entergy Texas (TX)	••				(11)
9/2/15	Kansas City Power & Light (MO)	7.53	9.50	50.09	3/14-YE	89.7 (12)
9/10/15	Kansas City Power & Light (KS)	7.44	9.30	50.48	6/14-YE	40.1 (12)
9/23/15	· · · · · · · · · · · · · · · · · · ·	8.57		52.66	5/15-YE	64.5 (LIR,13)
9/24/15	Westar Energy (K5)				9/14	185.3 (B)
2015	3RD QUARTER: AVERAGES/TOTAL	7.85	9.40	51.08		379.6
	OBSERVATIONS	3	2	3		5

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	DECISIONS	

		ROR	ROE	Common Eq. as %	Test Year	Amt.
Date	Company (State)	_%_	_%_	Cap. Str.	Rate Base	s Mil.
10/15/15	Orange & Rockland Utilities (NY)	7.10	9.00	48.00	10/15-A	9.3 (B.D.14)
10/29/15	NorthWestern Carp. (SD)	7.24			9/14-A	40.7 (1,8)
11/5/15	Southern California Edison (CA)	**	••		12/15-A	-450.4 (Z)
11/19/15	Consumers Energy (MI)	5.18	10.30	41.50	5/16-A	126.4 (1,2)
11/19/15	PPL Electric Utilities (PA)				12/16	124.0 (D,B)
11/19/15	Wisconsin Public Service (WI)	8.24	10.00	50.47	12/16-A	-7.9
11/23/15	Virginia Electric and Power (VA)				12/14	0.0 (15)
12/3/15	Mississippi Power (MS)	6.68	9.23	49.73	5/16-A	126.1 (LIR,1,B)
12/3/15	Northern States Power-Wisconsin (WI)	7.8i	10.00	52,49	12/16-A	7.6
12/9/15	Ameren Illinois (IL)	7.65	9.14	50.00	12/14-YE	95,1 (D)
12/9/15	Commonwealth Edison (IL)	7.05	9.14	46.25	12/14-YE	-65.5 (D)
12/11/15	DTE Electric (MI)	5,70	10.30	38.03	6/15-A	238.2 (1)
12/15/15	Portland General Electric (OR)	7.51	9.60	50.00	12/16-A	70.4 (8,16)
12/17/15	PECO Energy (PA)	••	-		12/16	127.0 (D,B)
12/17/15	Southwestern Public Service (TX)	7.88	9.70	51.00 (Hy)	6/14-YE	-4.0
12/18/15	Avista Corp. (ID)	7.42	9.50	50,00	12/14-A	1.7 (8)
12/22/15	Georgia Power (GA)				12/15	19.1 (LIR,17)
12/23/15	PacifiCorp (ID)				_	10.2 (LIR,18)
12/30/15	PacifiCorp (WY)	7.40	9.50	51,44	12/15-A	16.3 (R)
2015	ATH QUARTER: AVERAGES/TOTAL	7.22	9.62	48.24	-	484.3
	OBSERVATIONS	13	12	12		19
2015	YEAR-TO-DATE: AVERAGES/TOTAL	7.38	9.85	49.54		1,887.0
I	OBSERVATIONS	35	30	30		51

January 14, 2016

### GAS UTILITY DECISIONS

Onto	Company (State)	ROR	ROE	Common Eq. as % <u>Cap. Str.</u>	Tast Year & Rate Base	Amt. 5 Mil.
1/13/15	Consumers Energy (MT)	***	10.30			
1/14/15			10.30	-	12/15 6/14-YE	45.0 (I,B)
1/14/15					6/14-YE	5.7 (LIR,19)
1/21/15	,	6.26	9.05	50.48	12/15-A	1.5 (LIR,19)
1/21/15	• • •	6.56	9.05	50.33	12/15-A	3.5 (R)
1/26/15		4.54	7.UJ	دورور	10/14	71.1 (R)
1/27/15					9/14-YE	26.5 (LIR,20)
1/27/15			_		12/15	0.3 (LIR,21)
1/28/15	Northern Indiana Public Service (IN)			u.s	6/14-YE	14.7 (LIR,22) 0.3 (LIR,23)
2015	1ST QUARTER: AVERAGES/TOTAL	6,41	9.47	50.41	-	168.7
	OBSERVATIONS	1	3	2		9
4/7/15	Delta Natural Gas (KY)		-		12/14-YE	1.3 (LIR,24)
4/9/15	Avista Corporation (OR)	7.52	9.50	51.00	12/15-A	5.3 (B)
5/11/15	Atmos Energy (TN)	7.73	9.80	53.13	5/16-A	0.7 (B)
5/13/15	Missouri Gas Energy (MO)				2/15-YE	2.8 (LIR,25)
5/20/15	Laciede Gas (MO)	••			2/15-YE	5.5 (LIR,25)
6/17/15	Central Hudson Gas & Electric (NY)	5.52	9.00	48.00	6/16-A	1.8 (8,26)
6/25/15	Uberty Utilities EnergyNorth (NH)	***			3/14	10.5 (1,8,27)
6/30/15	Louisville Gas & Electric (KY)				6/16	7.0 (8)
2015	2ND QUARTER: AVERAGES/TOTAL	7.29	9.43	50,71	-	34.9
	OBSERVATIONS	3	3	3		8
7/22/15	Indiana Gas (IN)		***		12/14-YE	5.5 (LIR, 19)
7/22/15	Southern Indiana Gas & Electric (IN)	**			12/14-YE	3.2 (LIR,19)
7/28/15	Atmos Energy (TX)		***		12/14-YE	52.6 (I,B,28)
8/21/15	Columbia Gas of Virginia (VA)	7.35	9.75	42.01	12/13	25.2 (t,8)
8/25/15	CenterPoint Energy Resources (TX)				9/14	4.9 (8)
9/16/15	Liberty Utilities (Midstates N.G.) (MO)				5/15	0,3 (UR,29)
9/23/15	Atmos Energy (KY)		. (		9/16-YE	3.8 (LIR,24)
9/29/15	ENSTAR Natural Gas (AK)		,	- Marin	12/14	8.4 (LB,Z)
2015	3RD QUARTER: AVERAGES/TOTAL	7.35	9.75	42.01	انسس	103.9
	OBSERVATIONS	1	1	1		8.

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#### GAS UTILITY DECISIONS (continued)

Date	Company (State)	ROR	ROE %	Common Eq. as % Cap. Str.	Test Year & Rain Base	Amt. \$ Mila
10/7/15	Bay State Gas (MA)	7.75	9.55	53.54	12/14-YE	32.8 (8,30)
10/13/15	Mountaneer Gas (WV)	7.96 (E)	9.75	45.50 (E)	9/14-A	7.7 (B,31)
10/15/15	Orange and Rockland Utilities (NY)	7.10	9.00	48.00	10/16-A	27.5 (B,32)
10/30/15	NSTAR Gas (MA)	7.72	9.80	52.10	12/13-YE	15.8
11/4/15	CenterPoint Energy Resources (OK)	8.64		49.86	12/14-YE	0.9 (33)
11/5/15	Kansas Gas Service (KS)				6/15-YE	2.5 (21)
11/19/15	Wisconsin Public Service (WI)	7.80	10.00	50.47	12/16-A	-6.2
12/1/15	Predmont Natural Gas (NC)				9/15	16.5 (LIR,20)
12/3/15	Columbia Gas of Pennsylvania (PA)		-		12/16	28.0 (8)
12/3/15	Northern States Power-Wisconsin (WI)	7.81	10.00	52.49	12/16-A	4.2
12/9/15	Ameren Illinois (IL)	7.65 (B)	9.60 (B)	50.00 (8)	12/16-A	44.5
12/11/15	Michigan Gas Utilities (MI)	5.51	9.90	52.00	12/16	3.4 (B)
12/18/15	Avista Corp. (ID)	7.42	9.50	50.00	12/14-A	2.5 (B)
2015	4TH QUARTER: AVERAGES/TOTAL	7.54	9.68	50.40	******	180.1
	OBSERVATIONS	10	9	10		13
2015	YEAR-TO-DATE: AVERAGES/TOTAL	7.34	9.60	49.93		487,6
	OBSERVATIONS	16	16	16		38

#### FOOTNOTES

- A- Average
- B- Order followed stipulation or sattlement by the parties, Decision particulars not necessarily precedent-setting or specifically adopted by the regulatory body.
- COC- Case involved only the determination of cost-of-capital parameters.
- CWIP-, Construction work in progress
  - D- Applies to electric delivery only
  - DC: Date certain rate base valuation
  - E- Estimated
  - F- Return on fair value rate base
  - Hy- Hypothetical capital structure utilized
  - I- Interim rates implemented prior to the issuance of final order, normally under bond and subject to refund.
  - LIR Limited-issue rider proceeding
  - M- "Make-whole" rate change based on return on equity or overall return authorized in previous case.
  - R- Revised
  - Te-Temporary rates implemented prior to the assuance of final order
  - U- Double leverage capital structure utilized.
  - W- Case withdrawn
  - YE- Year-end
  - Z- Rate change implemented in multiple steps.

Capital structure includes cost free items or tax credit balances at the overall rate of return.

- (1) Consolidated rate proceeding for Monongahele Power and Potomac Edison, whose rate schedules were combined.
- (2) Increase authorized through a surcharge, Rider W, which reflects in rates the investment in the Warren County Power Station.
- (3) This proceeding determines the revenue requirement for Rider B, which is the mechanism through which the company recovers costs associated with its plan to convert the Altavista, Hopewell, and Southampton Power Stations to burn biomass fuels.
- (4) Represents rate increase associated with the company's Rider R proceeding, which is the mechanism through which the company recovers the investment in the Bear Garden generating facility.
- (5) This proceeding determines the revenue requirement for Rider S, which recognizes in rates the company's investment in the Virginia City Hybrid Energy Center.

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#### FOOTNOTES (continued)

- (6) This proceeding determines the revenue requirement for Rider BW, which recognizes in rates the company's investment in the Brunswick Generating Station. A \$10.1 million increase became effective Sept. 1, 2015, and an incremental \$50.5 million is to be implemented May 1, 2016.
- (7) Indicated rate increase is for base rates and reflects the transfer to base rates of \$30.1 million that was being collected through the company's interim transmission cost of service adjustment mechanism. The net overall rate increase is \$0.8 million.
- (8) The approved final Joint Proposal provides for the company to implement a \$15.3 million electric rate increase, effective July 1, 2015, based on a 9% return on equity (48% of capital) and a 6 62% overall return, a \$16 million increase on July 1, 2016, based on the same return parameters, and a \$14.1 million increase on July 1, 2017, that reflects a 9% return on equity (48% of capital) and a 6.58% overall return.
- (9) Joint Proposal adopted that extends the company's existing rate plan by one year through 12/31/16. Rates were not changed.
- (10) On 7/7/15, the PSC issued an order on remand directing the company to cease collecting CWIP-related rate increases effective 7/20/15, and to submit a refund plan. This PSC action is the result of a 2/12/15 Mississippi Supreme Court decision that reversed and remanded the PSCs 3/5/13 decision in the proceeding that had authorized the company a two-step \$156 million rate increase related to the Kemper generation plant.
- (11) Case dismissed at company request.
- (12) Approved settlements did not address rate-of-return issues.
- (13) Case involves company's request for a cash return on incremental V.C. Summer Units 2 and 3 CWIP and incorporates the 11% ROE that was initially authorized in 2009 for use in Summer CWIP-related proceedings.
- (14) The approved Joint settlement provides for a \$9.3 million electric rate increase on 11/1/15, and an \$8.8 million increase on 11/1/16. The approved rate changes incorporate a 9% return on equity (48% of capital) and overall returns of 7.1% (in rate year one) and 7.06% (in rate year two).
- (15) Proceeding reviewed earnings levels for the 2013-2014 blennium versus the 10% ROE authorized in the previous review. By law, no prospective rate change was permissible in this case. The Commission calculated the company had earned a 10.89% ROE, and ordered \$19.7 million of refunds.
- (16) A \$14.7 million base rate reduction become effective 1/1/16. An \$85.1 million base rate increase is to be implemented in mid-2016, provided the Carty generation station achieves commercial operation by 7/31/16.
- (17) Case represents recovery of a cash return on 2016 CWIP and a preliminary true-up of the cash return on 2015 CWIP for Plant Vogtle Units 3 and 4 under the company's highstatively-enabled nuclear construction cost recovery tariff.
- (18) Limited-issue proceeding to reflect updated net power costs.
- (19) Proceeding to establish the rates to be charged to customers under the company's "compliance and system improvement adjustment" mechanism.
- (20) Case involves the company's Integrity Management Rider.
- (21) Case involves the company's gas system reliability surcharge rider.
- (22) Case represents the company's first filing under its Gas Utility Infrastructure Cost Rider.
- (23) This is the initial proceeding to establish the rates to be charged to customers under the company's transmission, distribution, and storage system improvement charge rate adjustment mechanism.
- (24) Case represents an annual update to the company's pipe replacement program order.
- (25) Case represents an update to the company's semi-annual infrastructure system replacement surcharge inder.
- (26) The approved final Joint Proposal provides for the company to implement a \$1.8 million gas rate increase, effective July 1, 2015, based on a 9% return on equity (48% of capital) and a 6.62% overall return, a \$4.6 million increase on July 1, 2016, based on the same return parameters, and a \$4.4 million increase on July 1, 2017, that reflects a 9% return on equity (48% of capital) and a 6.58% overall return.
- (27) Indicated \$10.5 m Bion rate increase excludes a \$1.9 million "step" increase for capital additions that was effective July 1, 2015.
- (28) Rate change ratified by cities in Atmos' Mid-Tex Division.
- (29) Case represents annual update to company's infrastructure system replacement surcharge rider.
- (30) Two step rate increase authorized. A \$32.8 million first-step increase was implemented on £1/1/15, and an incremental second-step incremental increase of up to \$3.6 million to become effective on £1/1/16.
- (31) Settlement did not specify the equity ratio or ROR; in a demonstration filling, the PSC Staff calculated a 45.5% equity ratio and 7 96% ROR.
- (32) The approved settlement provides for a three-year gas rate plan under which gas rates are to increase \$27.5 million effective \$11/1/15, \$4.4 million effective Nov. 1, 2016, and \$6.7 million effective Nov. 1, 2017. The approved rate changes incorporate a 9% return on equity (48% of capital) and overall returns of 7.1% (in rate year one) and 7.06% (in rate years two and three).
- (33) Case involves the company's performance based ratemaking mechanism

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