

Oncor Electric Delivery Company LLC  
Recommended Capital Structure and Cost Rates  
for Ratemaking Purposes  
at December 31, 2021

<u>Type Of Capital</u>	<u>Ratios (1)</u>	<u>Cost Rate</u>	<u>Weighted Cost Rate</u>
Long-Term Debt	55.00%	4.39% (1)	2.41%
Common Equity	<u>45.00%</u>	10.30% (2)	<u>4.64%</u>
Total	<u>100.00%</u>		<u>7.05%</u>

Notes:

- (1) Company-provided.
- (2) From page 2 of this Exhibit.

Oncor Electric Delivery Company LLC  
Brief Summary of Common Equity Cost Rate

<u>Line No.</u>	<u>Principal Methods</u>	<u>Proxy Group of Fourteen Electric Companies</u>
1.	Discounted Cash Flow Model (DCF) (1)	9.05%
2.	Risk Premium Model (RPM) (2)	10.84%
3.	Capital Asset Pricing Model (CAPM) (3)	12.15%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	<u>12.60%</u>
5.	Indicated Range of Common Equity Cost Rates	<u>9.60% - 11.60%</u>
6.	Recommended Common Equity Cost Rate	<u>10.30%</u>

Notes: (1) From Exhibit DWD-3.  
(2) From page 1 of Exhibit DWD-4.  
(3) From page 1 of Exhibit DWD-5.  
(4) From page 1 of Exhibit DWD-9.

Proxy Group of Fourteen Electric Companies  
CAPITALIZATION AND FINANCIAL STATISTICS (1)  
2017 - 2021, Inclusive

	2021	2020	2019	2018	2017	
	(MILLIONS OF DOLLARS)					
<u>CAPITALIZATION STATISTICS</u>						
<u>AMOUNT OF CAPITAL EMPLOYED</u>						
TOTAL PERMANENT CAPITAL	\$34,183.780	\$31,746.146	\$29,472.393	\$27,131.517	\$25,522.450	
SHORT-TERM DEBT	\$1,152.131	\$954.222	\$985.672	\$1,070.510	\$977.275	
TOTAL CAPITAL EMPLOYED	<u>\$35,335.911</u>	<u>\$32,700.368</u>	<u>\$30,458.065</u>	<u>\$28,202.027</u>	<u>\$26,499.725</u>	
<u>INDICATED AVERAGE CAPITAL COST RATES (2)</u>						
TOTAL DEBT	3.67 %	4.08 %	4.29 %	4.42 %	4.36 %	
PREFERRED STOCK	4.60	5.47	5.17	5.26	4.67	
						<u>5 YEAR</u>
						<u>AVERAGE</u>
<u>CAPITAL STRUCTURE RATIOS</u>						
BASED ON TOTAL PERMANENT CAPITAL:						
LONG-TERM DEBT	56.51 %	55.26 %	53.49 %	52.83 %	52.69 %	54.16 %
PREFERRED STOCK	0.61	0.78	0.91	0.91	0.96	0.83
COMMON EQUITY	<u>42.88</u>	<u>43.96</u>	<u>45.60</u>	<u>46.26</u>	<u>46.35</u>	<u>45.01</u>
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
BASED ON TOTAL CAPITAL:						
TOTAL DEBT, INCLUDING SHORT-TERM	57.78 %	56.42 %	54.62 %	54.17 %	54.42 %	55.48 %
PREFERRED STOCK	0.58	0.75	0.89	0.88	0.90	0.80
COMMON EQUITY	<u>41.64</u>	<u>42.84</u>	<u>44.49</u>	<u>44.95</u>	<u>44.69</u>	<u>43.72</u>
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>FINANCIAL STATISTICS</u>						
<u>FINANCIAL RATIOS - MARKET BASED</u>						
EARNINGS / PRICE RATIO	5.38 %	4.15 %	5.43 %	4.84 %	4.62 %	4.88 %
MARKET / AVERAGE BOOK RATIO	190.71	186.80	196.49	191.32	199.93	193.05
DIVIDEND YIELD	3.59	3.65	3.42	3.71	3.48	3.57
DIVIDEND PAYOUT RATIO	71.08	84.32	63.09	69.23	89.30	75.40
<u>RATE OF RETURN ON AVERAGE BOOK COMMON EQUITY</u>	10.05 %	7.87 %	10.46 %	8.70 %	8.66 %	9.15 %
<u>TOTAL DEBT / EBITDA (3)</u>	5.35 x	6.07 x	4.63 x	5.37 x	4.55 x	5.19 x
<u>FUNDS FROM OPERATIONS / TOTAL DEBT (4)</u>	9.76 %	11.65 %	13.05 %	17.91 %	17.17 %	13.91 %
TOTAL DEBT / TOTAL CAPITAL	57.78 %	56.42 %	54.62 %	54.17 %	54.42 %	55.48 %

Notes:

- (1) All capitalization and financial statistics for the group are the arithmetic average of the achieved results for each individual company in the group, and are based upon financial statements as originally reported in each year.
- (2) Computed by relating actual total debt interest or preferred stock dividends booked to average of beginning and ending total debt or preferred stock reported to be outstanding.
- (3) Total debt relative to EBITDA (Earnings before Interest, Income Taxes, Depreciation and Amortization)
- (4) Funds from operations (sum of net income, depreciation, amortization, net deferred income tax and investment tax credits, less total AFUDC) plus interest charges as a percentage of total debt.

Source of Information: Company Annual Forms 10-K

Capital Structure Based upon Total Permanent Capital for the  
Proxy Group of Fourteen Electric Companies  
2017 - 2021, Inclusive

	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>5 YEAR AVERAGE</u>
<u>Alliant Energy Corporation</u>						
Long-Term Debt	55.16 %	53.51 %	53.39 %	53.48 %	52.62 %	53.63 %
Preferred Stock	-	1.58	1.72	1.95	2.16	1.48
Common Equity	44.84	44.91	44.89	44.57	45.22	44.89
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Ameren Corporation</u>						
Long-Term Debt	57.07 %	54.97 %	53.29 %	52.05 %	51.52 %	53.78 %
Preferred Stock	0.56	0.71	0.81	0.88	0.92	0.78
Common Equity	42.37	44.32	45.90	47.07	47.56	45.44
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>American Electric Power Company, Inc.</u>						
Long-Term Debt	59.86 %	60.19 %	57.30 %	55.06 %	53.62 %	57.21 %
Preferred Stock	-	-	-	-	-	-
Common Equity	40.14	39.81	42.70	44.94	46.38	42.79
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Duke Energy Corporation</u>						
Long-Term Debt	56.43 %	55.52 %	55.39 %	55.45 %	55.61 %	55.68 %
Preferred Stock	1.73	1.82	1.87	-	-	1.08
Common Equity	41.84	42.66	42.74	44.55	44.39	43.24
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Edison International</u>						
Long-Term Debt	61.49 %	56.44 %	54.21 %	53.76 %	46.65 %	54.51 %
Preferred Stock	4.63	5.19	6.48	8.02	8.44	6.55
Common Equity	33.88	38.37	39.31	38.22	44.91	38.94
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Entergy Corporation</u>						
Long-Term Debt	68.46 %	66.67 %	63.04 %	64.08 %	64.80 %	65.41 %
Preferred Stock	0.76	0.76	0.90	0.87	0.85	0.83
Common Equity	30.78	32.57	36.06	35.05	34.35	33.76
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Eversource Energy</u>						
Long-Term Debt	51.17 %	52.48 %	51.77 %	42.70 %	49.60 %	49.54 %
Preferred Stock	-	-	-	-	-	-
Common Equity	48.83	47.52	48.23	57.30	50.40	50.46
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Eversource Energy</u>						
Long-Term Debt	55.25 %	53.22 %	52.44 %	52.92 %	52.30 %	53.23 %
Preferred Stock	0.47	0.51	0.58	0.63	0.66	0.57
Common Equity	44.28	46.27	46.98	46.45	47.04	46.20
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>

Capital Structure Based upon Total Permanent Capital for the  
Proxy Group of Fourteen Electric Companies  
2017 - 2021, Inclusive

	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>5 YEAR AVERAGE</u>
<u>IDACORP, Inc.</u>						
Long-Term Debt	42.85 %	43.86 %	42.70 %	43.63 %	43.68 %	43.34 %
Preferred Stock	-	-	-	-	-	-
Common Equity	57.15	56.14	57.30	56.37	56.32	56.66
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>NorthWestern Corporation</u>						
Long-Term Debt	52.09 %	52.72 %	52.27 %	51.98 %	50.26 %	51.86 %
Preferred Stock	-	-	-	-	-	-
Common Equity	47.91	47.28	47.73	48.02	49.74	48.14
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>OGE Energy Corporation</u>						
Long-Term Debt	52.57 %	49.04 %	43.56 %	44.00 %	43.78 %	46.59 %
Preferred Stock	-	-	-	-	-	-
Common Equity	47.43	50.96	56.44	56.00	56.22	53.41
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Portland General Electric Company</u>						
Long-Term Debt	54.82 %	53.83 %	50.06 %	49.72 %	50.10 %	51.71 %
Preferred Stock	-	-	-	-	-	-
Common Equity	45.18	46.17	49.94	50.28	49.90	48.29
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>The Southern Company</u>						
Long-Term Debt	64.99 %	63.22 %	61.71 %	63.72 %	66.38 %	64.00 %
Preferred Stock	0.36	0.38	0.40	0.42	0.44	0.40
Common Equity	34.65	36.40	37.89	35.86	33.18	35.60
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Xcel Energy Inc.</u>						
Long-Term Debt	58.91 %	57.93 %	57.77 %	57.01 %	56.66 %	57.66 %
Preferred Stock	-	-	-	-	-	-
Common Equity	41.09	42.07	42.23	42.99	43.34	42.34
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Proxy Group of Fourteen Electric Companies</u>						
Long-Term Debt	56.51 %	55.26 %	53.49 %	52.83 %	52.69 %	54.15 %
Preferred Stock	0.61	0.78	0.91	0.91	0.96	0.84
Common Equity	42.88	43.96	45.60	46.26	46.35	45.01
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>

Source of Information  
Annual Forms 10-K

Oncor Electric Delivery Company LLC  
Operating Subsidiary Company Capital Structures of the  
Proxy Group of Fourteen Electric Companies

Company Name	Parent Company Ticker	2021			
		Common Equity	Preferred Equity	Long-Term Debt	Total Capital
Interstate Power and Light Company	LNT	50.85%	0.00%	49.15%	100.00%
Wisconsin Power and Light Company	LNT	53.75%	0.00%	46.25%	100.00%
Ameren Illinois Company	AEE	55.73%	0.49%	43.78%	100.00%
Union Electric Company	AEE	51.68%	0.71%	47.61%	100.00%
AEP Texas Inc.	AEP	40.96%	0.00%	59.04%	100.00%
Appalachian Power Company	AEP	48.48%	0.00%	51.52%	100.00%
Indiana Michigan Power Company	AEP	46.57%	0.00%	53.43%	100.00%
Kentucky Power Company	AEP	44.22%	0.00%	55.78%	100.00%
Kingsport Power Company	AEP	NA	NA	NA	NA
Ohio Power Company	AEP	48.95%	0.00%	51.05%	100.00%
Public Service Company of Oklahoma	AEP	54.50%	0.00%	45.50%	100.00%
Southwestern Electric Power Company	AEP	48.13%	0.00%	51.87%	100.00%
Wheeling Power Company	AEP	NA	NA	NA	NA
Duke Energy Carolinas, LLC	DUK	51.68%	0.00%	48.32%	100.00%
Duke Energy Florida, LLC	DUK	48.57%	0.00%	51.43%	100.00%
Duke Energy Indiana, LLC	DUK	53.76%	0.00%	46.24%	100.00%
Duke Energy Kentucky, Inc.	DUK	NA	NA	NA	NA
Duke Energy Ohio, Inc.	DUK	58.26%	0.00%	41.74%	100.00%
Duke Energy Progress, LLC	DUK	49.82%	0.00%	50.18%	100.00%
Southern California Edison Company	EIX	42.65%	4.64%	52.71%	100.00%
Entergy Arkansas, LLC	ETR	47.23%	0.00%	52.77%	100.00%
Entergy Louisiana, LLC	ETR	42.99%	0.00%	57.01%	100.00%
Entergy Mississippi, LLC	ETR	45.77%	0.00%	54.23%	100.00%
Entergy New Orleans, LLC	ETR	44.76%	0.00%	55.24%	100.00%
Entergy Texas, Inc.	ETR	50.53%	0.80%	48.67%	100.00%
Evergy Kansas Central, Inc.	EVRG	53.60%	0.00%	46.40%	100.00%
Evergy Kansas South, Inc.	EVRG	NA	NA	NA	NA
Evergy Metro, Inc.	EVRG	50.81%	0.00%	49.19%	100.00%
Evergy Missouri West, Inc.	EVRG	NA	NA	NA	NA
Westar Energy (KPL)	EVRG	NA	NA	NA	NA
NSTAR Electric Company	ES	55.25%	0.48%	44.28%	100.00%
Public Service Company of New Hampshire	ES	48.95%	0.00%	51.05%	100.00%
The Connecticut Light and Power Company	ES	55.02%	1.21%	43.77%	100.00%
Idaho Power Company	IDA	55.19%	0.00%	44.81%	100.00%
NorthWestern Corporation	NWE	47.93%	0.00%	52.07%	100.00%
Oklahoma Gas and Electric Company	OGE	53.53%	0.00%	46.47%	100.00%
Portland General Electric Company	POR	45.18%	0.00%	54.82%	100.00%
Alabama Power Company	SO	51.79%	1.41%	46.80%	100.00%
Georgia Power Company	SO	55.81%	0.00%	44.19%	100.00%
Mississippi Power Company	SO	55.57%	0.00%	44.43%	100.00%
Northern States Power Company	XEL	52.88%	0.00%	47.12%	100.00%
Northern States Power Company	XEL	52.78%	0.00%	47.22%	100.00%
Public Service Company of Colorado	XEL	56.63%	0.00%	43.37%	100.00%
Southwestern Public Service Company	XEL	54.46%	0.00%	45.54%	100.00%
Minimum		40.96%	0.00%	41.74%	100.00%
Maximum		58.26%	4.64%	59.04%	100.00%

Source: S&P Global Market Intelligence

Oncor Electric Delivery Company LLC  
Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the  
Proxy Group of Fourteen Electric Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Fourteen Electric Companies	Average Dividend Yield (1)	Value Line Projected Five Year Growth in EPS (2)	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (3)	Adjusted Dividend Yield (4)	Indicated Common Equity Cost Rate (5)
Alliant Energy Corporation	2.88 %	4.50 %	6.10 %	6.10 %	5.57 %	2.96 %	8.53 %
Ameren Corporation	2.71	6.50	7.50	7.40	7.13	2.81	9.94
American Electric Power Company, Inc.	3.46	6.50	5.80	6.10	6.13	3.57	9.70
Duke Energy Corporation	3.82	7.00	6.10	5.85	6.32	3.94	10.26
Edison International	4.39	NMF	4.00	5.35	4.68	4.49	9.17
Entergy Corporation	3.70	3.00	1.00	6.00	3.33	3.76	7.09
Evergy, Inc	3.55	7.50	6.10	5.12	6.24	3.66	9.90
Eversource Energy	2.97	5.50	6.20	7.10	6.27	3.06	9.33
IDACORP, Inc.	2.76	4.00	4.30	4.40	4.23	2.82	7.05
NorthWestern Corporation	4.33	2.00	3.10	4.50	3.20	4.40	7.60
OGE Energy Corporation	4.36	6.50	3.50	1.90	3.97	4.45	8.42
Portland General Electric Company	3.29	7.00	4.60	4.60	5.40	3.38	8.78
The Southern Company	3.92	5.50	4.00	6.20	5.23	4.02	9.25
Xcel Energy Inc.	2.86	6.00	6.40	6.90	6.43	2.95	9.38
						Average	<u>8.89 %</u>
						Median	<u>9.21 %</u>
						Average of Mean and Median	<u>9.05 %</u>

NA= Not Available

NMF= Not Meaningful Figure

Notes.

- (1) Indicated dividend at 03/18/2022 divided by the average closing price of the last 60 trading days ending 03/18/2022 for each company.
- (2) From pages 2 through 15 of this Exhibit
- (3) Average of columns 2 through 4 excluding negative growth rates.
- (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 6) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for Alliant Energy Corporation,  $2.88\% \times (1 + \{1/2 \times 5.57\% \}) = 2.96\%$
- (5) Column 5 + column 6.

Source of Information.

Value Line Investment Survey  
www.zacks.com Downloaded on 03/18/2022  
www.yahoo.com Downloaded on 03/18/2022

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<p>(A) Diluted EPS Excl nonrec gain (losses):  '10, (.32) '11, (.32), '12, (.36) '12, (.37) '13, (.63),  gain (loss) from discontinued ops, '13, (.92),  '15 21¢ Net earnings report due early May.</p>	<p>(B) Div'ds paid late Mar., June, Sept., &amp; Dec  Div'd reinvest plan available. (C) Incl intang.  eq, '21 \$.60/sh (D) In mll. (E) Rate base Org  cost depr. Rate allowed on com. eq in MO in</p>	<p>'22 elec &amp; gas, none specified, in IL, electric,  varies, in '21, gas, 9.67%, earned on avg. com.  eq, '21, 10.6% Regulatory Climate: MO, Average,  IL, Below Average</p>	<p>Company's Financial Strength A  Stock's Price Stability 100  Price Growth Persistence 75  Earnings Predictability 95</p>
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(A) Dil EPS Excl nonrec. losses '12, 70¢, '13 24¢; '14, 67¢; '17, 15¢, '18, 41¢, '20, '22 21¢. losses on disc. ops. '14, 80¢, '16, 60¢. '20 EPS don't sum due to rounding. Next eps due early May. (B) Div'ds paid mid-Mar., June, Sept., & Dec. ' Div'd reinv. avail (C) Incl. intang. in '20 \$41.25/dsh (D) in mll, ad, for rev split (E) Rate base Net ong. cost Rate	all'd on com. eq. in '21 in NC: 9.6%, in '19 in SC: 9.5%, in '20 in FL: 9.5%-11.5%, in '20 in IN: 9.7%, earn on avg. com. eq., '20 9.9% Reg Clim NC, SC Avg, OH, IN Above Avg.	<b>Company's Financial Strength</b> A <b>Stock's Price Stability</b> 95 <b>Price Growth Persistence</b> 35 <b>Earnings Predictability</b> 85
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ENTERGY CORP. NYSE-ETR

RECENT PRICE 105.21

P/E RATIO 15.4 (Trailing: 15.3) (Median: 14.0)

RELATIVE P/E RATIO 0.86

DIV YLD 3.9%

VALUE LINE

TIMELINESS 4 Lowered 12/10/21

SAFETY 2 Raised 12/13/19

TECHNICAL 2 Raised 3/4/22

BETA .95 (1.00 = Market)

18-Month Target Price Range

Low-High \$88-\$132

Midpoint (\$% to Mid) \$110 (5%)

2025-27 PROJECTIONS

Price Gain Ann'l Total

High 160 (+50%) 14%

Low 115 (+10%) 6%

Institutional Decisions

202021 202021 402021

to Buy 306 264 352

to Sell 273 275 244

Hld's(000) 174484 183072 182168

Percent 30

shares 20

traded 10

% TOT. RETURN 2/22

THIS STOCK 25.3 15.1

1 yr. 25.3 15.1

3 yr. 24.3 61.1

5 yr. 65.2 84.2

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25-27

53.94 59.47 69.15 56.82 64.27 63.67 57.94 63.86 69.71 64.54 60.55 61.35 58.23 54.63 50.51 57.95 54.85 55.00

10.69 11.73 12.89 13.29 16.54 17.53 15.98 16.25 17.68 17.71 18.72 16.70 16.50 17.19 18.21 17.90 17.75 18.50

5.36 5.60 6.20 6.30 6.66 7.55 6.02 4.96 5.77 5.81 6.88 5.19 5.88 6.30 6.90 6.87 6.30 6.70

2.16 2.58 3.00 3.00 3.24 3.32 3.32 3.32 3.32 3.34 3.42 3.50 3.58 3.66 3.74 3.86 4.09 4.30

9.44 10.29 13.92 12.99 13.33 15.21 18.18 15.73 14.82 16.79 17.28 22.07 22.45 21.72 24.52 30.86 18.15 19.00

40.45 40.71 42.07 45.54 47.53 50.81 51.73 54.00 55.83 51.89 45.12 44.28 46.78 51.34 54.56 57.42 60.20 63.45

202.67 193.12 189.36 189.12 178.75 176.36 177.81 178.37 179.24 178.39 179.13 180.52 189.06 199.15 200.24 202.65 206.00 209.00

14.3 19.3 16.6 12.0 11.6 9.1 11.2 13.2 12.9 12.5 10.9 15.0 13.8 16.5 15.3 15.0 15.0 15.0

77 10.2 1.00 .80 .74 .57 71 74 .68 .63 .57 .75 .75 .88 .79 .80 80.20 83.45

2.8% 2.4% 2.9% 4.0% 4.2% 4.9% 4.9% 5.1% 4.5% 4.6% 4.6% 4.5% 4.4% 3.5% 3.6% 3.7%

Revenues per sh

"Cash Flow" per sh

Earnings per sh A

Div'd Decl'd per sh B + J

Cap'l Spending per sh

Book Value per sh C

Common Shs Outst'g D

Avg Ann'l P/E Ratio

Relative P/E Ratio

Avg Ann'l Div'd Yield

59.25

21.25

8.00

5.10

19.75

73.00

214.00

17.0

95.0

3.7%

CAPITAL STRUCTURE as of 12/31/21

Total Debt \$27082 mill. Due in 5 Yrs \$10975 mill

LT Debt \$24842 mill LT Interest \$780 0 mill

Incl \$83.6 mill of securitization bonds.

(LT interest earned 3.0x)

Leases, Uncapitalized Annual rentals \$65.3 mill

Pension Assets-12/21 \$6993 1 mill

Oblig \$8409 6 mill.

Pfd Stock \$254.4 mill Pfd Div'd \$18 3 mill

200,000 shs 6.25%-7.5%, \$100 par, 250,000 shs

8.75%, 1 4 mill. shs. 5.375%, all cum., without sinking

fund

Common Stock 203,027,662 shs as of 1/31/22

MARKET CAP: \$21 billion (Large Cap)

10302 11391 12495 11513 10846 11074 11009 10879 10114 11743 11300 11500

1091 9 904.5 1060 1061.2 1249 8 950.7 1092 1 1258.2 1406.7 1402 8 1320 1420

13.0% 26.7% 37.8% 2.2% 11.3% 1.8% NMF NMF NMF 16.1% 23.0% 23.0%

11.9% 10.1% 9.3% 7.4% 8.1% 14.7% 17.5% 16.7% 12.2% 7.1% 8.0% 8.0%

55.8% 55.1% 54.9% 57.8% 63.6% 63.6% 63.2% 62.0% 65.5% 67.6% 66.5% 66.5%

42.9% 43.6% 43.8% 40.8% 35.5% 35.5% 35.9% 37.1% 33.7% 31.7% 32.5% 33.0%

21432 22109 22842 22714 22777 22528 24602 27557 32386 36733 38025 40175

27299 27882 28723 27824 27921 29664 31974 35183 38853 42244 43675 45250

6.4% 5.4% 6.0% 6.0% 6.9% 5.7% 5.8% 5.9% 5.6% 4.8% 4.5% 4.5%

11.5% 9.1% 10.3% 11.1% 15.1% 11.6% 12.0% 12.0% 12.6% 11.6% 10.5% 10.5%

11.6% 9.2% 10.4% 11.2% 15.2% 11.7% 12.2% 12.1% 12.7% 11.9% 10.5% 10.5%

5.2% 3.0% 4.4% 4.8% 7.7% 3.9% 4.9% 5.2% 5.9% 5.2% 3.5% 4.0%

56% 68% 58% 58% 50% 68% 61% 58% 55% 57% 65% 64%

Revenues (\$mill)

Net Profit (\$mill)

Income Tax Rate

AFUDC % to Net Profit

Long-Term Debt Ratio

Common Equity Ratio

Total Capital (\$mill)

Net Plant (\$mill)

Return on Total Cap'l

Return on Shr. Equity

Return on Com Equity E

Returned to Com Eq

All Div'ds to Net Prof

12700

1735

23.0%

8.0%

66.5%

33.0%

47000

49900

5.0%

11.0%

11.0%

4.0%

64%

ELECTRIC OPERATING STATISTICS

2019 2020 2021

% Change Retail Sales (KWH) -1.4 -4.1 +3.2

Avg Indust. Use (MWH) 1070 1017 1015

Avg Indust. Revs. or KWH(c) 5.24 4.95 5.91

Capacity at Peak (MW) 23687 25665 NA

Peak Load, Summer (MW) 21598 21340 NA

Annual Load Factor (%) 64 62 NA

% Change Customers (yr end) +8 +1 +1.0

Fixed Charge Cov (%)

165 202 243

ANNUAL RATES

Past 10 Yrs. Past 5 Yrs. Est'd '19-'21

of change (per sh) 10 Yrs. 5 Yrs. to '25-'27

Revenues -1.0% -3.5% 1.5%

"Cash Flow" 1.0% -5% 3.0%

Earnings -- 1.5% 3.0%

Dividends 1.5% 2.0% 5.0%

Book Value 1.5% 1.5% 5.0%

Cal-endar

QUARTERLY REVENUES (\$ mill.)

Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2019 2610 2666 3141 2462 10879

2020 2427 2413 2904 2370 10114

2021 2845 2822 3353 2723 11743

2022 2700 2700 3200 2700 11300

2023 2750 2750 3250 2750 11500

Cal-endar

EARNINGS PER SHARE A

Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2019 1.32 1.22 1.82 1.94 6.30

2020 .59 1.79 2.59 1.93 6.90

2021 1.66 1.30 2.63 1.28 6.87

2022 1.25 1.60 2.70 .75 6.30

2023 1.35 1.70 2.85 .80 6.70

Cal-endar

QUARTERLY DIVIDENDS PAID B + J

Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2018 .89 .89 .89 .91 3.58

2019 .91 .91 .91 .93 3.66

2020 .93 .93 .93 .95 3.74

2021 .95 .95 .95 1.01 3.86

2022 1.01

BUSINESS: Entergy Corporation supplies electricity to 3 million customers through subsidiaries in Arkansas, Louisiana, Mississippi, Texas, and New Orleans (regulated separately from Louisiana). Distributes gas to 206,000 customers in Louisiana. Has a nonutility subsidiary that owns one nuclear unit (scheduled to be sold after shutdown in 5/22) Electric revenue breakdown, residential, 37%, commercial, 24%, industrial, 27%, other, 12% Generating sources gas, 46%, nuclear, 30%; coal, 6%; purchased, 18%. Fuel costs 32% of revenues '21 reported depreciation rate 2.7% Has 12,400 employees Chairman & CEO Leo P. Denault, Incorporated: Delaware, Address: 639 Loyola Avenue, P. O. Box 61000, New Orleans, Louisiana 70161, Tel. 504-576-4000 Internet www.entergy.com

Entergy is seeking to recover costs associated with severe storms in 2020 and 2021. In 2020, three hurricanes caused more than \$2 billion of damage in Louisiana and Texas. Hurricane Ida last year resulted in restoration costs of \$2.7 billion, above the previous estimate of \$2.1 billion-\$2.5 billion In the coming months, Entergy will issue more than \$3 billion of securitized bonds, which includes \$1 billion for Hurricane Ida. The utility will seek recovery from the regulatory commissions in Louisiana and New Orleans (regulated separately from the rest of the state) for the remainder of the costs from Hurricane Ida. However, Entergy received criticism last year in New Orleans for its performance following the hurricane, which might affect the regulatory process The company's exit from the merchant power business should be completed by mid-2022. Entergy has closed and sold its nonregulated nuclear units over the past few years. Its last nonutility nuclear plant, Palisades in Michigan, will be shut down in May. The sale of the plant is expected to close in midyear. (The point of these deals is that the buyer gets the

nuclear decommissioning trust at a sizable discount and the seller is relieved of the responsibility of decommissioning the facility.) Entergy's business risk has lessened as the company winds down its presence in nonregulated power generation An earnings decline is likely in 2022, followed by improvement in 2023. Entergy's nonutility subsidiary contributed \$0.61 to share net last year, so this income will likely be less this year. Another negative factor will be an increase in average shares outstanding. Our 2022 estimate is at the midpoint of Entergy's targeted range of \$6.15-\$6.45 a share Even so, Entergy's industrial sector is experiencing an economic recovery, and the company is benefiting from rate relief in several jurisdictions (much of which comes via formula rate plans). We think profits will advance to \$6.70 a share in 2023. Management's guidance for next year is \$6.55-\$6.85. This untimely stock has a dividend yield that is slightly above the utility average. Total return prospects are subpar for the next 18 months and don't stand out for the 3- to 5-year period. Paul E. Debbas, CFA March 11, 2022

(A) Diluted EPS Excl nonrec. losses '12, '13, '14, '15, '16, '17, '18, '19, '20, '21, '22, '23, '24, '25, '26, '27, '28, '29, '30, '31, '32, '33, '34, '35, '36, '37, '38, '39, '40, '41, '42, '43, '44, '45, '46, '47, '48, '49, '50, '51, '52, '53, '54, '55, '56, '57, '58, '59, '60, '61, '62, '63, '64, '65, '66, '67, '68, '69, '70, '71, '72, '73, '74, '75, '76, '77, '78, '79, '80, '81, '82, '83, '84, '85, '86, '87, '88, '89, '90, '91, '92, '93, '94, '95, '96, '97, '98, '99, '00, '01, '02, '03, '04, '05, '06, '07, '08, '09, '10, '11, '12, '13, '14, '15, '16, '17, '18, '19, '20, '21, '22, '23, '24, '25, '26, '27, '28, '29, '30, '31, '32, '33, '34, '35, '36, '37, '38, '39, '40, '41, '42, '43, '44, '45, '46, '47, '48, '49, '50, '51, '52, '53, '54, '55, '56, '57, '58, '59, '60, '61, '62, '63, '64, '65, '66, '67, '68, '69, '70, '71, '72, '73, '74, '75, '76, '77, '78, '79, '80, '81, '82, '83, '84, '85, '86, '87, '88, '89, '90, '91, '92, '93, '94, '95, '96, '97, '98, '99, '00, '01, '02, '03, '04, 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'05, '06, '07, '08, '09, '10, '11, '12, '13, '14, '15, '16, '17, '18, '19, '20, '21, '22, '23, '24, '25, '26, '27, '28, '29, '30, '31, '32, '33, '34, '35, '36, '37, '38, '39, '40, '41, '42, '43, '44, '45, '46,

EVERGY, INC. NYSE-EVRG			RECENT PRICE	62.41	P/E RATIO	17.9	(Trailing: 16.3 Median: NMF)	RELATIVE P/E RATIO	1.00	DIV'D YLD	3.8%	VALUE LINE					
TIMELINESS	5	Lowered 12/31/21															
SAFETY	2	New 9/14/18															
TECHNICAL	2	Lowered 3/11/22															
BETA	.95	(1.00 = Market)															
18-Month Target Price Range																	
Low-High	Midpoint (% to Mid)																
\$50-\$73	\$62 (0%)																
2025-27 PROJECTIONS																	
Price	Gain	Ann'l Total Return															
High	95	(+50%)	14%														
Low	70	(+10%)	7%														
Institutional Decisions																	
202021	3Q2021	4Q2021															
to Buy	291	262	308														
to Sell	220	240	237														
Hld's(000)	198932	204443	206094														
Evergy, Inc. was formed through the merger of Great Plains Energy and Westar Energy in June of 2018. Great Plains Energy holders received .5981 of a share of Evergy for each of their shares, and Westar Energy holders received one share of Evergy for each of their shares. The merger was completed on June 4, 2018. Shares of Evergy began trading on the New York Stock Exchange one day later.			2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	© VALUE LINE PUB. LLC	25-27	
CAPITAL STRUCTURE as of 12/31/21																	
Total Debt \$11166 mill. Due in 5 Yrs \$4100.3 mill.																	
LT Debt \$9297.9 mill LT Interest \$332.8 mill																	
Incl \$40.9 mill. finance leases																	
(LT interest earned 3.8x)																	
Leases, Uncapitalized Annual rentals \$18.8 mill																	
Pension Assets-12/21 \$1714.7 mill																	
Oblig \$2561.7 mill.																	
Pfd Stock None																	
Common Stock 229,311,689 shs as of 2/18/22																	
MARKET CAP: \$14 billion (Large Cap)																	
ELECTRIC OPERATING STATISTICS																	
2019 2020 2021																	
% Change Retail Sales (kWh)			NA	-3.9	+3.1												
Avg. Indust. Use (MWh)			NA	NA	NA												
Avg. Indust. Revs per kWh (¢)			7.25	7.14	6.94												
Capacity at Peak (Mw)			NA	NA	NA												
Peak Load, Summer (Mw)			NA	NA	NA												
Annual Load Factor (%)			NA	NA	NA												
% Change Customers (yr-end)			NA	NA	NA												
Fixed Charge Cov (%)			305	286	350												
ANNUAL RATES			Past 10 Yrs.	Past 5 Yrs.	Est'd '19-'21												
of change (per sh)					to '25-'27												
Revenues			--	--	2.5%												
"Cash Flow"			--	--	5.0%												
Earnings			--	--	7.5%												
Dividends			--	--	7.0%												
Book Value			--	--	3.5%												
QUARTERLY REVENUES (\$ mill.)			Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year									
2019			1217	1222	1578	1131	5147.8										
2020			1117	1185	1517	1094	4913.4										
2021			1612	1236	1617	1122	5586.7										
2022			1250	1250	1650	1150	5300										
2023			1300	1300	1700	1150	5450										
EARNINGS PER SHARE <sup>A</sup>			Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year									
2019			.39	.57	1.56	.28	2.79										
2020			.31	.59	1.60	.22	2.72										
2021			.84	.81	1.95	.23	3.83										
2022			.55	.85	1.85	.30	3.55										
2023			.60	.90	2.00	.30	3.80										
QUARTERLY DIVIDENDS PAID <sup>B</sup>			Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year									
2018			.40	.40	.46	.475	1.74										
2019			.475	.475	.475	.505	1.93										
2020			.505	.505	.505	.535	2.05										
2021			.535	.535	.535	.5725	2.18										
2022			.5725														
BUSINESS: Evergy, Inc. was formed through the merger of Great Plains Energy and Westar Energy in June of 2018. Through its subsidiaries (now doing business under the Evergy name), provides electric service to 1.6 million customers in Kansas and Missouri including the greater Kansas City area. Electric revenue breakdown: residential, 34%, commercial, 30%, industrial, 11%, wholesale, 13%, other, 12%. Generating sources: coal, 54%, nuclear, 17%; purchased, 29%. Fuel costs 28% of revenues. '21 reported depreciation: 3%. Has 4,900 employees. Chairman: Mark A. Ruelle. President & CEO: David A. Campbell. COO: Kevin E. Bryant. Inc.: Missouri Address 1200 Main Street, Kansas City, Missouri 64105. Tel.: 816-556-2200. Internet: www.evergy.com																	
Evergy's utilities in Missouri have filed general rate cases. The company's Missouri Metro utility requested an increase of \$43.9 million (5.2%), based on a return on equity of 10% and a common-equity ratio of 51.2%. Its Missouri West utility filed for a hike of \$27.7 million (3.8%), based on a 10% ROE and a 51.8% common-equity ratio. These are the first rate cases Evergy has filed since the company was formed through a merger in June of 2018. Capital additions and updated depreciation rates are driving the petitions, partly offset by reductions in operating and maintenance expenses. New tariffs are expected to take effect on December 6th, 11 months after the filing date. This will be too late to have a significant effect on earnings in 2022. Note that the company plans to file rate applications in Kansas in 2023.																	
The earnings decline that is probable for 2022 should not be troubling for investors. Last year, a cold spell in the Gulf Coast region in February was a boon for Evergy's energy-marketing subsidiary. This boosted pretax income by \$86.6 million in the first quarter. We expect no re-																	
peat of these auspicious conditions this year. A return to normal weather patterns would also be negative for the year-to-year comparison, as favorable weather boosted share net by \$0.08 in 2021. Still, there should be some positive factors, including increased income from the company's transmission system. We are sticking with our 2022 earnings estimate of \$3.55 a share, which is within Evergy's targeted range of \$3.43-\$3.63.																	
We expect earnings to improve in 2023. Rate relief in Missouri should be a key factor. Modest growth in kilowatt-hour sales should help, as well. Our estimate of \$3.80 a share would produce an increase of 7%. This is within Evergy's annual goal of 6%-8%.																	
This untimely stock has a dividend yield that is about average for a utility. Total return potential is subpar for the next 18 months and somewhat below average for the 3- to 5-year period. A standstill agreement with two investors expires after the 2022 annual meeting (normally held in the first week of May), so there is some speculative appeal.																	
Paul E. Debbas, CFA																	
March 11, 2022																	

(A) Diluted earnings. '19 EPS don't sum to full-year total due to rounding. Next earnings report due early May. (B) Dividends paid in mid-March, June, September, and December. (C) Dividend reinvestment plan available. (D) In millions. (E) Rate base. Original cost depreciated. Rate allowed on common equity in Missouri '18: none specified; in Kansas in '18, 9.3%. Earned on average common equity, '21 9.8%. Regulatory Climate: Average.

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Company's Financial Strength B++  
Stock's Price Stability 80  
Price Growth Persistence NMF  
Earnings Predictability NMF

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EVERSOURCE ENERGY NYSE-ES										RECENT PRICE	89.49	P/E RATIO	22.8 (Trailing: 26.0 Median: 19.0)	RELATIVE P/E RATIO	1.29	DIV'D YLD	2.9%	VALUE LINE
TIMELINESS	3	Raised 1/14/22	High: 36 5	40 9	45 7	56 7	56 8	60 4	66 1	70 5	86 6	99 4	92 7	90 9				Target Price Range
SAFETY	1	Raised 5/22/15	Low: 30 0	33 5	38 6	41 3	44 6	50 0	54 1	52 8	63 1	60 7	76 6	84 0				2025 2026 2027
TECHNICAL	2	Lowered 2/11/22	LEGENDS 0.80 x Dividends p sh divided by Interest Rate ..... Relative Price Strength Options Yes Shaded area indicates recession															
BETA	90	(1.00 = Market)																
18-Month Target Price Range																		
Low-High Midpoint (% to Mid)																		
\$72-\$121 \$97 (10%)																		
2025-27 PROJECTIONS																		
High	Price	Gain	Ann'l Total															
Low	85	(+15%)	7%															
		(-5%)	2%															
Institutional Decisions																		
10/2021 20/2021 30/2021																		
to Buy 331 360 328																		
to Sell 369 326 308																		
Hld's(000) 266387 266114 272358																		
Percent shares traded			30															
			20															
			10															
			</															

IDACORP, INC. NYSE:IDA										RECENT PRICE	112.66	P/E RATIO	23.3	(Trailing: 22.8 Median: 17.0)	RELATIVE P/E RATIO	1.22	DIV'D YLD	2.7%	VALUE LINE																		
TIMELINESS	4	Lowered 8/13/21	High: 37.8	42.7	45.7	54.7	70.1	70.5	83.4	100.0	102.4	114.0	113.6	113.8					Target Price Range																		
SAFETY	1	Raised 1/22/21	Low: 30.0	33.9	38.2	43.1	50.2	55.4	65.0	77.5	79.6	89.3	69.1	85.3					2024 2025 2026																		
TECHNICAL	3	Raised 1/7/22	LEGENDS 0.70 x Dividends p sh divided by Interest Rate ... Relative Price Strength Options: Yes Shaded area indicates recession																	200																	
BETA	.80	(1.00 = Market)																		160																	
18-Month Target Price Range																				100																	
Low-High Midpoint (% to Mid)																				80																	
\$92-\$140 \$116 (5%)																				60																	
2024-26 PROJECTIONS																				40																	
High Price Gain Ann'l Total																				30																	
Low 120 100 (+5%) 5%																				20																	
Institutional Decisions																																					
1Q2021 2Q2021 3Q2021																																					
to Buy 183 145 163																																					
to Sell 156 186 145																																					
Hld's(000) 39645 39928 39867																																					
Percent shares 15																																					
traded 5																																					
2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022																																					
20 15 21.23 19.51 20.47 21.92 20.97 20.55 21.55 24.81 25.51 25.23 25.04 26.76 27.19 26.70 26.77 28.95 29.75																				Revenues per sh																	
3.87 4.58 4.11 4.27 5.07 5.35 5.84 5.93 6.29 6.58 6.70 6.86 7.50 7.85 8.07 8.19 8.50 8.80																				"Cash Flow" per sh																	
1.75 2.35 1.86 2.18 2.64 2.95 3.36 3.37 3.64 3.85 3.87 3.94 4.21 4.49 4.61 4.69 4.90 5.10																				Earnings per sh <sup>A</sup>																	
1.20 1.20 1.20 1.20 1.20 1.20 1.20 1.20 1.37 1.57 1.76 1.92 2.08 2.24 2.40 2.56 2.72 2.88 3.05																				Div'd Decl'd per sh <sup>B</sup> = <sup>†</sup>																	
4.53 5.16 6.39 5.19 5.26 6.85 6.76 4.78 4.68 5.45 5.84 5.89 5.66 5.51 5.53 6.16 7.25 7.70																				Cap'l Spending per sh																	
24.04 25.77 26.79 27.76 29.17 31.01 33.19 35.07 36.84 38.85 40.88 42.74 44.65 47.01 48.88 50.73 52.80 54.85																				Book Value per sh <sup>C</sup>																	
42.66 43.63 45.06 46.92 47.90 49.41 49.95 50.16 50.23 50.27 50.34 50.40 50.42 50.42 50.42 50.46 50.45 50.45																				Common Shs Outst'g <sup>D</sup>																	
16.7 15.1 18.2 13.9 10.2 11.8 11.5 12.4 13.4 14.7 16.2 19.1 20.6 20.5 22.3 19.9 20.6																				Avg Ann'l P/E Ratio																	
.89 .82 .97 .84 .68 .75 .72 .79 .75 .77 .82 1.00 1.04 1.11 1.19 1.02 1.10																				Relative P/E Ratio																	
4.1% 3.4% 3.5% 4.0% 4.5% 3.4% 3.1% 3.3% 3.2% 3.1% 3.1% 2.8% 2.6% 2.5% 2.9%																				Avg Ann'l Div'd Yield																	
CAPITAL STRUCTURE as of 9/30/21																																					
Total Debt \$2000.6 mill. Due in 5 Yrs \$144.7 mill																				Revenues (\$mill)																	
LT Debt \$2000.6 mill LT Interest \$83.4 mill																				Net Profit (\$mill)																	
(LT interest earned 3.9x)																				Income Tax Rate																	
Pension Assets-12/20 \$871.6 mill																				AFUDC % to Net Profit																	
Oblig \$1337.4 mill																				Long-Term Debt Ratio																	
Pfd Stock None																				Common Equity Ratio																	
Common Stock 50,516,479 shs																				Total Capital (\$mill)																	
as of 10/22/21																				Net Plant (\$mill)																	
MARKET CAP: \$5.7 billion (Large Cap)																				Return on Total Cap'l																	
ELECTRIC OPERATING STATISTICS																				Return on Shr. Equity																	
2018 2019 2020																				Return on Com Equity <sup>E</sup>																	
% Change Retail Sales (KWH)																				All Div'ds to Net Prof																	
Avg. Indust. Use (MWH)																																					
Avg. Indust. Revs. per KWH (¢)																																					
Capacity at Peak (Mw)																																					
Peak Load, Summer (Mw)																																					
Annual Load Factor (%)																																					
% Change Customers (yr-end)																																					
Fixed Charge Cov (%)																																					
ANNUAL RATES																																					
Past 10 Yrs. Past 5 Yrs. Est'd '18-'20																																					
Revenues 2.5% 1.5% 3.5%																																					
"Cash Flow" 5.0% 4.5% 3.5%																																					
Earnings 6.0% 4.0% 4.0%																																					
Dividends 8.0% 8.0% 6.5%																																					
Book Value 5.0% 4.5% 4.0%																																					
Cal- QUARTERLY REVENUES(\$mill.) Full																				Year																	
endar Mar.31 Jun.30 Sep.30 Dec.31																																					
2018 310.1 340.0 408.8 311.9 1370.8																																					
2019																																					

BUSINESS: IDACORP, Inc is a holding company for Idaho Power Company, a regulated electric utility that serves 583,000 customers throughout a 24,000-square-mile area in southern Idaho and eastern Oregon (population 1.2 million). Most of the company's revenues are derived from the Idaho portion of its service area. Revenue breakdown: residential, 42%; commercial, 22%; industrial, 14%; irrigation, 12%, other, 10%. Generating sources: hydro, 39%; coal, 21%; gas, 12%; purchased, 28%. Fuel costs 32% of revenues. *20 reported depreciation rate 2.9%. Has 1,900 employees. Chairman: Richard J. Dahl President & CEO Lisa Grow Incorporated: Idaho, Address 1221 W. Idaho St., Boise, Idaho 83702. Telephone: 208-388-2200 Internet www.idacorpinc.com																			
The year that just ended was a good one for IDACORP, and we look for further growth in 2022. We think earnings in 2021 reached the upper end of the company's targeted range of \$4.80-\$4.90 a share. This would provide a 4% profit increase over the 2020 tally, which also was a solid year. The company's utility subsidiary, Idaho Power, is benefiting from strong customer growth. This metric was 2.9% for the 12-month period that ended on September 30th. The utility is also seeing the addition of large customers in its service area. A cobalt mine is expected to begin operations in mid-2022. Shell is adding a renewable natural gas facility, and a data center that is expected to use more than 20 megawatts is on the drawing board. In addition, management is controlling operating and maintenance expenses effectively. O&M costs in 2021 probably approximated the 2020 level, even in the face of inflationary pressures. All told, we think the bottom line will advance another 4%, to \$5.10 a share, in 2022. IDACORP will likely provide earnings guidance for this year when the company reports its financial results in mid-February.																			
The utility's integrated resource plan (IRP) is indicative of its accelerating growth in demand. Filed in late 2021, the IRP projects 2.6% annual growth in retail kilowatt-hour sales over the next five years. The previous IRP, filed two years earlier, projected 1.3% yearly growth. Idaho Power has put out a request for proposals seeking 80 mw of dispatchable capacity by mid-2023 in order to meet its expected peak demand. If the company winds up building this capacity, the utility might have to file a rate case. This has not occurred since 2011 because Idaho Power has been earning its allowed return on equity. This high-quality but untimely stock has a lofty valuation for a utility. This reflects the market's view of IDACORP's consistency, financial health (Financial Strength rating A+), and solid dividend growth prospects. The dividend yield is nearly a percentage point below the utility average. The equity does not stand out for the next 18 months. The recent quotation is well within our 3- to 5-year Target Price Range, so total return potential is low. Paul E. Debbas, CFA January 21, 2022																			



<p>(A) Diluted EPS Excl. gain (loss) on disc. ops '05 '66', '06, 1¢, nonrec. gains '12, 39¢ net; '15, 27¢; '18, 52¢; '19, 45¢. '18 '20 EPS net; sum due to rounding. Next earnings report due early Feb.</p>	<p>(B) Div'ds historically paid in late Mar., June, Sept. &amp; Dec. '20 Div'd reinvest. plan available. (C) Incl. deft. charges '18 '20 93/sh. (D) In mill. (E) Rate base. Net org. cost. Rate.</p>	<p>allowed on com. eq. in MT in '19 (elec.) 9.65%; in '17 (gas) 9.55%; in SD in '15 none spec., in NE in '07 10.4%, earned on avg. com. eq. '20 7.5%. Reg. Climate Below Avg.</p>	<p><b>Company's Financial Strength</b> <b>Stock's Price Stability</b> <b>Price Growth Persistence</b> <b>Earnings Predictability</b></p>	<p><b>B++</b> <b>40</b> <b>45</b> <b>90</b></p>
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<p><b>To subscribe call 1-800-VALUELINE</b></p>				

OGE ENERGY CORP. NYSE-OGE										RECENT PRICE	37.55	P/E RATIO	15.2	(Trailing: 16.0 Median: 17.0)	RELATIVE P/E RATIO	0.85	DIV'D YLD	4.4%	VALUE LINE																			
TIMELINESS	4	Lowered 12/17/21	High	28.6	30.1	40.0	39.3	36.5	34.2	37.4	41.8	45.8	46.4	38.6	38.5				Target Price Range																			
SAFETY	2	Lowered 12/18/15	20.3	25.1	27.7	32.8	24.2	23.4	32.6	29.6	38.0	23.0	29.2	35.2				2025 2026 2027																				
TECHNICAL	2	Lowered 3/11/22	LEGENDS																																			
BETA	1.05	(1.00 = Market)	0.56 x Dividends p sh divided by Interest Rate Relative Price Strength 2-for-1 split 7/13 Options: Yes Shaded area indicates recession																																			
18-Month Target Price Range																																						
Low-High																																						
Midpoint (% to Mid)																																						
\$27-\$43																																						
\$35 (-5%)																																						
2025-27 PROJECTIONS																																						
Price	55	Gain	40	(+45%)	13%	6%																																
Ann'l Total Return																																						
High																																						
Low																																						
Institutional Decisions																																						
202021	302021	402021																																				
to Buy	165	188	230																																			
to Sell	229	157	150																																			
Hld's(000)	125366	126167	128749																																			
Percent	18	12	6																																			
shares	18	12	6																																			
traded	18	12	6																																			
6																																						
2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	©VALUE LINE PUB. LLC	25-27																			
21.96	20.68	21.77	14.79	19.04	19.96	18.58	14.45	12.30	11.00	11.31	11.32	11.37	11.15	10.61	18.26	14.00	15.00	Revenues per sh	18.25																			
2.23	2.39	2.40	2.69	3.01	3.31	3.69	3.46	3.40	3.23	3.31	3.34	3.74	4.02	4.03	4.44	4.70	4.95	"Cash Flow" per sh	6.25																			
1.23	1.32	1.25	1.33	1.50	1.73	1.79	1.94	1.98	1.69	1.69	1.92	2.12	2.24	2.08	2.36	2.50	2.65	Earnings per sh <sup>A</sup>	3.25																			
6.7	.68	70	71	.73	.76	.80	.85	.95	1.05	1.16	1.27	1.40	1.51	1.58	1.63	1.66	1.70	Div'd Decl'd per sh <sup>B</sup>	1.85																			
2.67	3.04	4.01	4.37	4.36	6.48	5.85	4.99	2.86	2.74	3.31	4.13	2.87	3.18	3.25	3.89	4.75	4.75	Cap'l Spending per sh	4.75																			
8.79	9.16	10.14	10.52	11.73	13.06	14.00	15.30	16.27	16.66	17.24	19.28	20.06	20.69	18.15	20.27	21.10	22.05	Book Value per sh <sup>C</sup>	25.75																			
182.40	183.60	187.00	194.00	195.20	196.20	197.60	198.50	199.40	199.70	199.70	199.70	199.70	200.10	200.10	200.10	200.10	200.10	Common Shs Outst'g <sup>D</sup>	200.10																			
13.7	13.8	12.4	10.8	13.3	14.4	15.2	17.7	18.3	17.7	17.7	18.3	16.5	19.0	16.2	14.3	14.3	14.3	Avg Ann'l P/E Ratio	14.0																			
.74	.73	.75	.72	.85	.90	.97	.99	.96	.89	.93	.92	.89	1.01	.83	.76	.76	.76	Relative P/E Ratio	.80																			
4.0%	3.8%	4.5%	5.0%	3.7%	3.1%	2.9%	2.5%	2.6%	3.5%	3.9%	3.6%	4.0%	3.5%	4.7%	4.8%	4.8%	4.8%	Avg Ann'l Div'd Yield	4.0%																			
CAPITAL STRUCTURE as of 12/31/21						3671.2	2867.7	2453.1	2196.9	2259.2	2261.1	2270.3	2231.6	2122.3	3653.7	2800	3000	Revenues (\$mill)	3650																			
Total Debt \$4983.3 mill Due in 5 Yrs \$1486.9 mill						355.0	387.6	395.8	337.6	338.2	384.3	425.5	449.6	415.9	472.5	500	530	Net Profit (\$mill)	660																			
LT Debt \$4496.4 mill LT Interest \$158.7 mill						26.0%	24.9%	30.4%	29.2%	30.5%	32.5%	14.5%	7.4%	13.2%	11.5%	12.0%	12.0%	Income Tax Rate	12.0%																			
(LT interest earned 4.4x)						2.7%	2.6%	1.7%	3.7%	6.4%	15.0%	8.3%	1.6%	1.6%	2.2%	2.0%	2.0%	AFUDC % to Net Profit	2.0%																			
Leases, Uncapitalized Annual rentals \$5.7 mill						50.7%	43.1%	45.9%	44.3%	41.1%	41.7%	42.0%	43.6%	49.0%	52.6%	47.5%	53.0%	Long-Term Debt Ratio	50.5%																			
Pension Assets-12/21 \$486.0 mill						49.3%	56.9%	54.1%	55.7%	58.9%	58.3%	58.0%	56.4%	51.0%	47.4%	52.5%	47.0%	Common Equity Ratio	49.5%																			
Oblig \$502.9 mill						5615.8	5337.2	5999.7	5971.6	5849.6	6600.7	6902.0	7334.7	7126.2	8552.7	8020	9360	Total Capital (\$mill)	10375																			
Pfd Stock None						8344.8	6672.8	6979.9	7322.4	7696.2	8339.9	8643.8	9044.6	9374.6	9832.9	10345	10830	Net Plant (\$mill)	12075																			
Common Stock 200,201,818 shs						7.7%	8.6%	7.8%	6.9%	7.0%	7.0%	7.3%	7.1%	6.9%	6.4%	7.5%	6.5%	Return on Total Cap'l	7.5%																			
as of 1/31/22						12.8%	12.8%	12.2%	10.2%	9.8%	10.0%	10.6%	10.9%	11.5%	11.6%	12.0%	12.0%	Return on Shr. Equity	13.0%																			
MARKET CAP: \$7.5 billion (Large Cap)						12.8%	12.8%	12.2%	10.2%	9.8%	10.0%	10.6%	10.9%	11.5%	11.6%	12.0%	12.0%	Return on Com Equity <sup>E</sup>	13.0%																			
ELECTRIC OPERATING STATISTICS						7.2%	7.3%	6.5%	4.0%	3.3%	3.5%	3.8%	3.6%	2.8%	3.6%	4.0%	4.5%	Retained to Com Eq	5.5%																			
						44%	43%	47%	61%	67%	64%	64%	67%	76%	69%	66%	64%	All Div'ds to Net Prof	56%																			
						2019	2020	2021																														
% Change Retail Sales (KWH)						+1.1	-4.9	+2.6																														
Avg. Indust. Use (MWH)						NA	NA	NA																														
Avg. Indust. Revs. per KWH (¢)						4.69	4.40	7.68																														
Capacity at Peak (Mw)						NA	NA	NA																														
Peak Load, Summer (Mw)						6817	6437	NA																														
Annual Load Factor (%)						NA	NA	NA																														
% Change Customers (yr-end)						+1.0	+1.1	+1.4																														
Fixed Charge Cov. (%)						335	326	336																														
ANNUAL RATES						Past	Past	Est'd '19-'21																														
of change (per sh)						10 Yrs.	5 Yrs.	to '25-'27																														
Revenues						-3.0%	3.0%	5.5%																														
"Cash Flow"						3.5%	4.5%	7.0%																														
Earnings						4.0%	4.5%	6.5%																														
Dividends						8.0%	8.5%	3.0%																														
Book Value						5.5%	3.5%	4.5%																														
Cal-endar						QUARTERLY REVENUES (\$ mill.)	Full																															
						Mar.31	Jun.30	Sep.30	Dec.31																													
2019						490.0	513.7	755.4	472.5																													
2020						431.3	503.5	702.1	485.4																													
2021						1630.6	577.4	864.4	581.3																													
2022						600	650	900	650																													
2023						650	700	950	700																													
Cal-endar						EARNINGS PER SHARE <sup>A</sup>	Full																															
						Mar.31	Jun.30	Sep.30	Dec.31																													
2019						.24	.50	1.25	.26																													
2020						.23	.51	1.04	.30																													
2021						.26	.56	1.26	.27																													
2022						.27	.60	1.33	.30																													
2023						.30	.65	1.40	.30																													
Cal-endar						QUARTERLY DIVIDENDS PAID <sup>B</sup>	Full																															
						Mar.31	Jun.30	Sep.30	Dec.31																													
2018						.3325	.3325	.3325	.365																													
2019						.365	.365	.365	.388																													
2020						.3875	.3875	.3875	.4025																													
2021						.4025	.4025	.4025	.41																													
2022						.41																																
BUSINESS: OGE Energy Corp is a holding company for Oklahoma Gas and Electric Company (OG&E), which supplies electricity to 879,000 customers in Oklahoma (84% of electric revenues) and western Arkansas (8%), wholesale is (8%) Owns 3% of Energy Transfer's limited partnership units Electric revenue breakdown residential, 44%, commercial, 25%, industrial, 11%, oilfield, 10%, other, 10% Generating sources gas, 25%; coal, 21%; wind, 6%; purchased, 48% Fuel costs 58% of revenues. '21 reported depreciation rate (utility) 2.6% Has 2,200 employees Chairman, President and Chief Executive Officer: Sean Trauschke Incorporated Oklahoma Address: 321 North Harvey, P.O. Box 321, Oklahoma City, OK 73101-0321 Tel 405-553-3000 Internet www.oge.com																																						
pany plans to use the proceeds from the unit sales to reinvest in OG&E The sale process will be gradual and might not be completed until 2023.																																						
Our earnings estimates require an explanation. We are including equity income from OGE Energy's stake in Energy Transfer until the units are sold. Management is giving earnings guidance only for its OG&E subsidiary. The utility earned \$1.80 a share last year, and the company's guidance for 2022 is \$1.87-\$1.97. The service area's economy is healthy, and customer growth is accelerating. OG&E's long-term earnings growth rate target is 5%-7% annually Dividend hikes will lag profit growth for a while because the payout ratio is higher than OGE Energy wants Note that the steep revenue decline likely this year is not a concern because a surge in gas and power prices, passed through to customers, caused a big jump in the top line in the first quarter of 2021.																																						
This stock is untimely, but has an attractive dividend yield. Total return prospects are below the median for the 18-month span and the 3- to 5-year period.																																						
Paul E. Debbas, CFA March 11, 2022																																						

PORTLAND GENERAL NYSE-POR										RECENT PRICE	53.17	P/E RATIO	18.9	(Trailing: 20.8 Median: 18.0)	RELATIVE P/E RATIO	0.99	DIV'D YLD	3.4%	VALUE LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												
TIMELINESS	3	Raised 9/10/21	High	22.7	26.0	28.1	33.3	40.3	41.0	45.2	50.1	50.4	58.4	63.1	53.1				Target Price	Range																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
SAFETY	2	Raised 10/22/21	Low	17.5	21.3	24.3	27.4	29.0	33.0	35.3	42.4	39.0	44.0	32.0	40.8				2024	2025	2026																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
TECHNICAL	3	Raised 1/7/22	LEGENDS																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																												</

SOUTHERN COMPANY NYSE-SO				RECENT PRICE	69.49	P/RATIO	19.2	(Trailing: 19.6 Median: 16.0)	RELATIVE P/E RATIO	1.08	DIV'D YLD	3.9%	VALUE LINE																								
TIMELINESS	4	Lowered 8/13/21	High.	46 7	48 6	48 7	51 3	53 2	54 6	53.5	49 4	64 3	71 1	68 9	69 8					Target Price Range																	
SAFETY	2	Lowered 2/21/14	Low.	35 7	41 8	40 0	40 3	41 4	46 0	46 7	42 4	43 3	42 0	56 7	65 4					2025 2026 2027																	
TECHNICAL	3	Raised 1/28/22	LEGENDS — 0.62 x Dividends p sh divided by Interest Rate .... Relative Price Strength Options Yes Shaded area indicates recession																	160																	
BETA	.95	(1.00 = Market)																		120																	
18-Month Target Price Range																				100																	
Low-High																				80																	
Midpoint (% to Mid)																				60																	
\$56-\$78																				50																	
\$67 (-5%)																				40																	
2025-27 PROJECTIONS																				30																	
Price																				20																	
Gain																				15																	
Ann'l Total Return																																					
High	75																																				
Low	55																																				
Institutional Decisions																																					
1Q2021	676	743	676																																		
2Q2021	649	580	598																																		
3Q2021	627,954	629,680	633,336																																		
to Buy																																					
to Sell																																					
Hld's(000)	627,954	629,680	633,336																																		
Percent shares traded	18	12	6																																		
2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027																
19.24	20.12	22.04	19.21	20.70	20.41	19.06	19.26	20.34	19.18	20.09	22.86	22.73	20.34	19.29	21.50	22.55	23.70	25.00	26.50	28.00	29.50																
4.01	4.22	4.43	4.43	4.51	4.91	5.18	5.27	5.28	5.47	5.69	6.64	6.41	6.33	6.98	7.20	7.40	7.75	8.00	8.25	8.50	8.75																
2.10	2.28	2.25	2.32	2.36	2.55	2.67	2.70	2.77	2.84	2.83	3.21	3.00	3.17	3.25	3.50	3.60	3.80	3.90	4.10	4.20	4.30																
1.54	1.60	1.66	1.73	1.80	1.87	1.94	2.01	2.08	2.15	2.22	2.30	2.38	2.46	2.54	2.62	2.70	2.78	2.86	2.94	3.02	3.10																
4.01	4.65	5.10	5.70	4.85	5.23	5.54	6.16	6.58	6.22	7.38	7.37	7.74	7.17	7.04	7.65	6.55	6.55	6.55	6.55	6.55	6.55																
15.24	16.23	17.08	18.15	19.21	20.32	21.09	21.43	21.98	22.59	25.00	23.98	23.92	26.11	26.48	26.75	27.65	28.70	29.75	30.80	31.85	32.90																
746.27	763.10	777.19	819.65	843.34	865.13	867.77	887.09	907.78	911.72	990.39	1007.6	1033.8	1053.3	1056.5	1070.0	1070.0	1070.0	1070.0	1070.0	1070.0	1070.0																
16.2	16.0	16.1	13.5	14.9	15.8	17.0	16.2	16.0	15.8	17.8	15.5	15.1	17.6	17.9	18.0	18.0	18.0	18.0	18.0	18.0	18.0																
.87	.85	.97	.90	.95	.99	1.08	.91	.84	.80	.93	.78	.82	.94	.92	.95	.95	.95	.95	.95	.95	.95																
4.5%	4.4%	4.6%	5.5%	5.1%	4.6%	4.3%	4.6%	4.7%	4.8%	4.4%	4.6%	5.3%	4.4%	4.4%	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%	4.2%																
CAPITAL STRUCTURE as of 9/30/21																																					
Total Debt \$2836 mill. Due in 5 Yrs \$13952 mill																																					
LT Debt \$48843 mill. LT Interest \$1682 mill																																					
(LT interest earned 3.4x)																																					
Leases, Uncapitalized Annual rentals \$300 mill.																																					
Pension Assets-12/20 \$15367 mill.																																					
Oblig \$16646 mill.																																					
Pfd Stock \$291 mill																																					
Pfd Div'd \$15 mill																																					
Incl 10 mill shs 5.83% cum. pfd. (\$25 stated value), 475,115 shs 4.2%-5.44% cum. pfd. (\$100 par)																																					
Common Stock 1,059,803,931 shs																																					
MARKET CAP: \$74 billion (Large Cap)																																					
ELECTRIC OPERATING STATISTICS																																					
% Change Retail Sales (KWH)	2018	2019	2020																																		
	+3.6	-8.5	-5.3																																		
Avg. Indust. Use (MWH)	3048	2947	NA																																		
Avg. Indust. Revs per KWH (¢)	6.04	6.03	NA																																		
Capacity at Yearend (MW)	45824	41940	NA																																		
Peak Load, Summer (MW)	36429	34209	NA																																		
Annual Load Factor (%)	61.2	60.3	NA																																		
% Change Customers (yr-end)	+1.0	-8.9	+1.3																																		
Fixed Charge Cov. (%)	280	281	270																																		
ANNUAL RATES	Past 10 Yrs.	Past 5 Yrs.	Est'd '18-'20 to '25-'27																																		
Revenues	4.0%	4.5%	4.0%																																		
"Cash Flow"	3.0%	2.5%	5.5%																																		
Earnings	3.5%	3.5%	3.0%																																		
Dividends	3.5%	3.0%	3.5%																																		
Book Value	3.5%	3.0%	3.5%																																		
Cal-endar	QUARTERLY REVENUES (mill.)	Mar.31	Jun.30	Sep.30	Dec.31	Full Year																															
2019	5412	5098	5995	4914	21419	20375																															
2020	5018	4620	5620	5117	20375	23000																															
2021	5910	5198	6238	5654	23000	24150																															
2022	6200	5600	6600	5750	24150	25350																															
2023	6500	5900	6900	6050	25350																																
Cal-endar	EARNINGS PER SHARE A	Mar.31	Jun.30	Sep.30	Dec.31	Full Year																															
2019	.75	.85	1.25	.32	3.17	3.17																															
2020	.81	.75	1.18	.51	3.25	3.25																															
2021	1.09	.73	1.22	.46	3.50	3.50																															
2022	1.05	.80	1.30	.45	3.60	3.60																															
2023	1.10	.85	1.40	.45	3.80	3.80																															
Cal-endar	QUARTERLY DIVIDENDS PAID B	Mar.31	Jun.30	Sep.30	Dec.31	Full Year																															
2018	.58	.60	.60	.60	2.38	2.38																															
2019	.60	.62	.62	.62	2.46	2.46																															
2020	.62	.64	.64	.64	2.54	2.54																															
2021	.64	.66	.66	.66	2.62	2.62																															
2022																																					
(A) Diluted EPS Excl. nonrec gain (losses) '09, (.25¢) '13, (.83¢), '14, (.59¢), '15, (.25¢), '16, (.28¢), '17, (.32¢), '18, (.78¢), '19, \$1.30; '20, (.17¢), '21, (.54¢). Next earnings report due mid-Feb. (B) Div'ds paid in early Mar., June, Sept., and Dec. (C) Div'd reinvest plan available. (D) Incl de'd charges. In '20 \$18.91/sh. (E) In mill. (F) Rate base AL, MS, fair value, FL, GA, orig. material is obtained from sources believed to be reliable and is provided without warranties of any kind. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, stored, sold, or transmitted in any form, electronic or other, for use for generating or marketing any product or service, or for any other purpose. (G) Winter peak in '18.																																					
cost Allowed return on common eq. (blended) 12.5%, earned on avg. com. eq. '20, 12.5%. Regulatory Climate: GA, AL Above Average MS, FL Average. (F) Winter peak in '18.																																					
Company's Financial Strength A Stock's Price Stability 90 Price Growth Persistence 35 Earnings Predictability 95																																					
To subscribe call 1-800-VALUELINE																																					

<p>(A) Diluted EPS. Excl. nonrecurring gain (losses): '10, \$6. '15, (16c), '17, (5c), gains (loss) on discontinued ops: '05, 3c; '06 1c, '09, (1c); '20, '20 EPS don't sum due to rounding</p> <p>© 2022 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for informational purposes only, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any wanted, electronic or other form, or used for generation or modification, any kind of, or electronic publication, service or product.</p>	<p>Next earnings report due late Jan. (B) Div'd historically paid mid-Jan., Apr., July, and Oct's 'Div'd reinvestment plan available. (C) Incl. intangibles. In '20: \$2373 million</p>	<p>\$4 42/sh. (D) In mill (E) Rate base. Varies. Rate allowed on com. eq. (blended), 9.6%, earned on avg com eq, '20: 10.6% Regulatory Climate Average.</p>	<p>Company's Financial Strength A+ Stock's Price Stability 95 Price Growth Persistence 65 Earnings Predictability 100</p>
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Oncor Electric Delivery Company LLC  
Summary of Risk Premium Models for the  
Proxy Group of Fourteen Electric Companies

	<u>Proxy Group of Fourteen Electric Companies</u>
Predictive Risk Premium Model (PRPM) (1)	10.77 %
Risk Premium Using an Adjusted Total Market Approach (2)	<u>10.90</u>
Average	<u><u>10.84 %</u></u>

Notes:

(1) From page 2 of this Exhibit.

(2) From page 3 of this Exhibit.

Oncor Electric Delivery Company LLC  
Indicated ROE  
Derived by the Predictive Risk Premium Model (1)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Fourteen Electric Companies	LT Average Predicted Variance	Spot Predicted Variance	Recommended Variance (2)	GARCH Coefficient	Predicted Risk Premium (3)	Risk-Free Rate (4)	Indicated ROE (5)
Alliant Energy Corporation	0.27%	0.36%	0.32%	2.68	10.70%	2.89%	13.59%
Ameren Corporation	0.23%	0.29%	0.26%	2.02	6.52%	2.89%	9.41%
American Electric Power Company, Inc.	0.29%	0.31%	0.30%	2.36	8.73%	2.89%	11.62%
Duke Energy Corporation	0.31%	0.28%	0.29%	1.85	6.74%	2.89%	9.63%
Edison International	0.43%	0.50%	0.47%	1.49	8.70%	2.89%	11.59%
Entergy Corporation	0.40%	0.49%	0.45%	2.21	12.56%	2.89%	NMF
Eversource Energy	0.41%	0.57%	0.49%	0.82	4.90%	2.89%	7.79%
IDACORP, Inc.	0.31%	0.37%	0.34%	1.62	6.75%	2.89%	9.64%
NorthWestern Corporation	0.29%	0.28%	0.28%	2.21	7.80%	2.89%	10.69%
OGE Energy Corporation	0.33%	0.20%	0.27%	2.26	7.51%	2.89%	10.40%
Portland General Electric Company	0.31%	0.32%	0.31%	2.20	8.65%	2.89%	11.54%
The Southern Company	0.28%	0.29%	0.29%	2.10	7.43%	2.89%	10.32%
Xcel Energy Inc.	1.27%	0.35%	0.81%	0.98	9.97%	2.89%	12.86%
	0.28%	0.24%	0.26%	2.81	9.03%	2.89%	11.92%
						Average	10.85%
						Median	10.69%
					Average of Mean and Median		10.77%

Notes:

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

Oncor Electric Delivery Company LLC  
Indicated Common Equity Cost Rate  
Through Use of a Risk Premium Model  
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Fourteen Electric Companies</u>
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	3.95 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A2 Rated Public Utility Bonds	<u>0.41</u> (2)
3.	Adjusted Prospective Yield on A2 Rated Public Utility Bonds	4.36 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group	<u>0.17</u> (3)
5.	Adjusted Prospective Bond Yield	4.53 %
6.	Equity Risk Premium (4)	<u>6.37</u>
7.	Risk Premium Derived Common Equity Cost Rate	<u><u>10.90</u></u> %

- Notes:
- (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 10-11 of this Exhibit).
  - (2) The average yield spread of A rated public utility bonds over Aaa rated corporate bonds of 0.41% from page 4 of this Exhibit.
  - (3) Adjustment to reflect the Baa1 Moody's LT issuer rating of the Utility Proxy Group as shown on page 5 of this Exhibit. The 0.17% upward adjustment is derived by taking 2/3 of the spread between A2 and Baa2 Public Utility Bonds ( $2/3 * 0.25\% = 0.17\%$ ) as derived from page 4 of this Exhibit.
  - (4) From page 7 of this Exhibit.



Oncor Electric Delivery Company LLC  
Interest Rates and Bond Spreads for  
Moody's Corporate and Public Utility Bonds

Selected Bond Yields

	[1]	[2]	[3]
	Aaa Rated Corporate Bond	A2 Rated Public Utility Bond	Baa2 Rated Public Utility Bond
Feb-2022	3.25 %	3.68 %	3.95 %
Jan-2022	2.93	3.33	3.57
Dec-2021	2.65	3.04	3.28
Average	<u>2.94 %</u>	<u>3.35 %</u>	<u>3.60 %</u>

Selected Bond Spreads

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:

0.41 % (1)

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

0.25 % (2)

Notes:

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

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

Source of Information:

Bloomberg Professional Service

Oncor Electric Delivery Company LLC  
Comparison of Long-Term Issuer Ratings for  
Proxy Group of Fourteen Electric Companies

Proxy Group of Fourteen Electric Companies	Moody's		Standard & Poor's	
	Long-Term Issuer Rating		Long-Term Issuer Rating	
	March 2022		March 2022	
	Long-Term Issuer Rating (1)	Numerical Weighting (2)	Long-Term Issuer Rating (1)	Numerical Weighting (2)
Alliant Energy Corporation	A3/Baa1	7.5	A/A-	6.5
Ameren Corporation	A3/Baa1	7.5	BBB+	8.0
American Electric Power Company, Inc.	Baa1	8.0	A-	7.0
Duke Energy Corporation	A3	7.0	BBB+	8.0
Edison International	Baa2	9.0	BBB	9.0
Entergy Corporation	Baa2	9.0	BBB+	8.0
Evergy, Inc.	Baa1	8.0	A-	7.0
Eversource Energy	A3	7.0	A-	7.0
IDACORP, Inc.	A3	7.0	BBB	9.0
NorthWestern Corporation	Baa2	9.0	BBB	9.0
OGE Energy Corporation	A3	7.0	A-	7.0
Portland General Electric Company	A3	7.0	BBB+	8.0
The Southern Company	A3	7.0	BBB+	8.0
Xcel Energy Inc.	A3	7.0	A-	7.0
Average	Baa1	7.6	BBB+	7.8

Notes:

(1) Ratings are that of the average of each company's utility operating subsidiaries.

(2) From page 6 of this Exhibit.

Source Information: Moody's Investors Service  
Standard & Poor's Global Utilities Rating Service

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

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

Oncor Electric Delivery Company LLC  
Judgment of Equity Risk Premium for  
Proxy Group of Fourteen Electric Companies

<u>Line No.</u>		<u>Proxy Group of Fourteen Electric Companies</u>
1.	Calculated equity risk premium based on the total market using the beta approach (1)	8.14 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A rated bonds (2)	5.44
3.	Predicted Equity Risk Premium Based on Regression Analysis of 1,192 Fully-Litigated Electric Utility Rate Cases (3)	<u>5.52</u>
4.	Average equity risk premium	<u><u>6.37 %</u></u>

Notes: (1) From page 8 of this Exhibit.  
(2) From page 12 of this Exhibit.  
(3) From page 13 of this Exhibit.

Oncor Electric Delivery Company LLC  
Derivation of Equity Risk Premium Based on the Total Market Approach  
Using the Beta for the  
Proxy Group of Fourteen Electric Companies

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Fourteen Electric Companies</u>
<u>Ibbotson-Based Equity Risk Premiums:</u>		
1.	Ibbotson Equity Risk Premium (1)	5.92 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.23
3.	Ibbotson Equity Risk Premium based on PRPM (3)	8.07
4.	Equity Risk Premium Based on Value Line Summary and Index (4)	7.44
5.	Equity Risk Premium Based on Value Line S&P 500 Companies (5)	12.19
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>10.65</u>
7.	Conclusion of Equity Risk Premium	8.75 %
8.	Adjusted Beta (7)	<u>0.93</u>
9.	Forecasted Equity Risk Premium	<u><u>8.14 %</u></u>

Notes provided on page 9 of this Exhibit.

Oncor Electric Delivery Company LLC  
Derivation of Equity Risk Premium Based on the Total Market Approach  
Using the Beta for the  
Proxy Group of Fourteen Electric Companies

Notes:

- (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2021 Market Report minus the arithmetic mean monthly yield of Moody's average Aaa and Aa corporate bonds from 1926-2020.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of large company common stocks relative to Moody's average Aaa and Aa rated corporate bond yields from 1928-2020 referenced in Note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is discussed in the accompanying direct testimony. The Ibbotson equity risk premium based on the PRPM is derived by applying the PRPM to the monthly risk premiums between Ibbotson large company common stock monthly returns and average Aaa and Aa corporate monthly bond yields, from January 1928 through February 2022.
- (4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the average consensus forecast of Aaa corporate bonds of 3.95% (from page 3 of this Exhibit) from the projected 3-5 year total annual market return of 11.39% (described fully in note 1 on page 2 of Exhibit DWD-5).
- (5) Using data from Value Line for the S&P 500, an expected total return of 16.14% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.95% results in an expected equity risk premium of 12.19%.
- (6) Using data from Bloomberg Professional Service for the S&P 500, an expected total return of 14.60% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.95% results in an expected equity risk premium of 10.65%.
- (7) Average of mean and median beta from page 1 of Exhibit DWD-5.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2021 SBBI Yearbook, John Wiley & Sons, Inc.  
Industrial Manual and Mergent Bond Record Monthly Update.  
Value Line Summary and Index  
Blue Chip Financial Forecasts, March 1, 2022 and December 1, 2021  
Bloomberg Professional Service

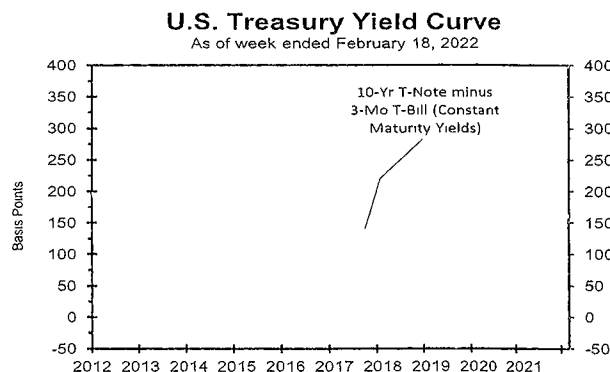
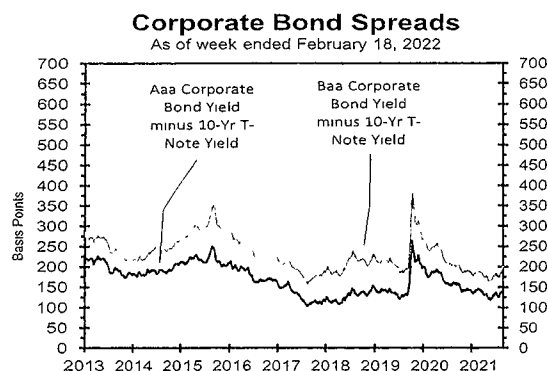
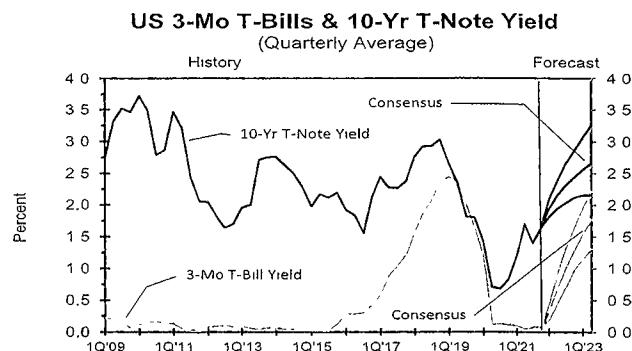
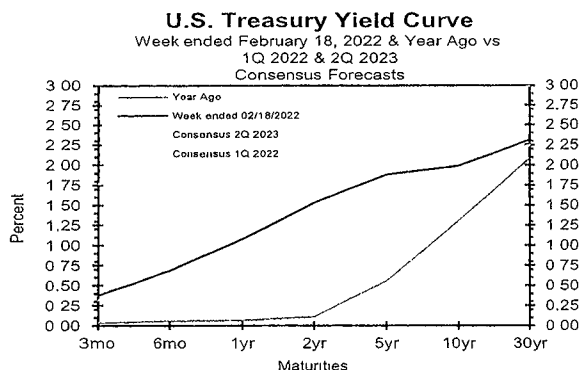
## Consensus Forecasts of U.S. Interest Rates and Key Assumptions

Interest Rates	History								Consensus Forecasts-Quarterly Avg.					
	Average For Week Ending				Average For Month				1Q	2Q	3Q	4Q	1Q	2Q
	Feb 18	Feb 11	Feb 4	Jan 28	Jan	Dec	Nov	4Q 2021	2022	2022	2022	2022	2023	2023
Federal Funds Rate	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.2	0.6	1.0	1.3	1.6	1.8
Prime Rate	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.4	3.7	4.1	4.3	4.6	4.8
SOFR	0.05	0.05	0.05	0.04	0.05	0.05	0.05	0.05	0.2	0.5	0.9	1.2	1.4	1.7
Commercial Paper, 1-mo.	0.08	0.08	0.08	0.07	0.07	0.06	0.05	0.06	0.2	0.6	0.9	1.2	1.5	1.7
Treasury bill, 3-mo.	0.38	0.31	0.21	0.19	0.06	0.05	0.05	0.05	0.3	0.7	1.0	1.3	1.5	1.8
Treasury bill, 6-mo.	0.69	0.64	0.49	0.41	0.15	0.07	0.06	0.09	0.5	0.8	1.1	1.4	1.7	1.9
Treasury bill, 1 yr.	1.08	0.98	0.80	0.69	0.30	0.18	0.11	0.20	0.8	1.1	1.4	1.6	1.8	2.0
Treasury note, 2 yr.	1.53	1.42	1.20	1.09	0.68	0.51	0.39	0.53	1.3	1.6	1.8	2.0	2.1	2.2
Treasury note, 5 yr.	1.88	1.84	1.66	1.60	1.23	1.20	1.11	1.18	1.7	2.0	2.1	2.3	2.4	2.5
Treasury note, 10 yr.	1.99	1.95	1.83	1.79	1.47	1.56	1.58	1.54	1.9	2.1	2.3	2.4	2.6	2.7
Treasury note, 30 yr.	2.31	2.25	2.14	2.11	1.85	1.94	2.06	1.95	2.2	2.5	2.6	2.7	2.9	3.0
Corporate Aaa bond	3.43	3.31	3.19	3.14	2.79	2.79	2.85	2.81	3.2	3.4	3.7	3.9	4.0	4.1
Corporate Baa bond	4.00	3.85	3.70	3.64	3.26	3.25	3.31	3.27	3.9	4.2	4.4	4.6	4.8	4.9
State & Local bonds	3.08	2.97	2.92	2.85	2.57	2.57	2.59	2.58	2.6	2.9	3.0	3.2	3.3	3.4
Home mortgage rate	3.92	3.69	3.55	3.55	3.10	3.07	3.07	3.08	3.7	3.9	4.1	4.2	4.4	4.5

Key Assumptions	History								Consensus Forecasts-Quarterly					
	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q
	2020	2020	2020	2020	2021	2021	2021	2021	2022	2022	2022	2022	2023	2023
Fed's AFE \$ Index	111.3	112.4	107.2	105.1	103.4	102.9	105.0	107.0	107.8	108.0	108.1	107.8	107.5	107.2
Real GDP	-5.1	-31.2	33.8	4.5	6.3	6.7	2.3	7.0	1.9	3.9	3.1	2.6	2.4	2.3
GDP Price Index	1.6	-1.5	3.6	2.2	4.3	6.1	6.0	7.1	4.8	3.8	3.1	2.8	2.6	2.5
Consumer Price Index	1.3	-3.4	4.8	2.2	4.1	8.2	6.7	7.9	5.8	3.9	3.1	2.7	2.5	2.4
PCE Price Index	1.3	-1.6	3.7	1.5	3.8	6.5	5.3	6.3	5.1	3.5	2.8	2.4	2.3	2.3

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



## Long-Range Survey:

The table below contains the results of our twice-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are consensus estimates for the years 2023 through 2027 and averages for the five-year periods 2023-2027 and 2028-2032. Apply these projections cautiously. Few if any economic, demographic and political forces can be evaluated accurately over such long time spans.

		Average For The Year					Five-Year Averages	
		2023	2024	2025	2026	2027	2023-2027	2028-2032
1 Federal Funds Rate	CONSENSUS	0.8	1.6	2.0	2.2	2.3	1.8	2.2
	Top 10 Average	1.2	2.2	2.7	2.7	2.8	2.3	2.9
	Bottom 10 Average	0.4	1.0	1.4	1.7	1.8	1.2	1.5
2 Prime Rate	CONSENSUS	4.0	4.7	5.1	5.3	5.4	4.9	5.3
	Top 10 Average	4.3	5.3	5.8	5.8	5.9	5.4	6.0
	Bottom 10 Average	3.6	4.1	4.5	4.9	5.0	4.4	4.6
3 LIBOR, 3-Mo	CONSENSUS	1.0	1.7	2.2	2.4	2.5	1.9	2.4
	Top 10 Average	1.3	2.1	2.7	2.9	3.0	2.4	3.1
	Bottom 10 Average	0.7	1.2	1.6	1.9	2.0	1.5	1.8
4 Commercial Paper, 1-Mo	CONSENSUS	0.9	1.6	2.1	2.3	2.4	1.9	2.4
	Top 10 Average	1.2	2.0	2.6	2.8	2.9	2.3	2.9
	Bottom 10 Average	0.6	1.2	1.6	1.9	2.0	1.5	1.8
5 Treasury Bill Yield, 3-Mo	CONSENSUS	0.8	1.4	1.8	2.0	2.3	1.7	2.2
	Top 10 Average	1.2	1.9	2.5	2.6	2.8	2.2	2.9
	Bottom 10 Average	0.4	0.8	1.2	1.5	1.8	1.1	1.6
6 Treasury Bill Yield, 6-Mo	CONSENSUS	0.8	1.4	1.9	2.1	2.4	1.7	2.3
	Top 10 Average	1.2	2.0	2.6	2.7	2.9	2.3	3.0
	Bottom 10 Average	0.4	0.9	1.2	1.6	1.9	1.2	1.7
7 Treasury Bill Yield, 1-Yr	CONSENSUS	1.0	1.6	2.1	2.4	2.5	1.9	2.4
	Top 10 Average	1.4	2.1	2.7	2.8	3.0	2.4	3.1
	Bottom 10 Average	0.6	1.2	1.5	1.9	2.0	1.4	1.8
8 Treasury Note Yield, 2-Yr	CONSENSUS	1.3	1.9	2.4	2.6	2.6	2.2	2.6
	Top 10 Average	1.7	2.5	3.0	3.1	3.2	2.7	3.4
	Bottom 10 Average	0.8	1.4	1.8	2.0	2.1	1.6	1.9
9 Treasury Note Yield, 5-Yr	CONSENSUS	1.9	2.4	2.8	2.9	2.9	2.6	3.0
	Top 10 Average	2.3	3.0	3.4	3.5	3.6	3.1	3.8
	Bottom 10 Average	1.5	1.9	2.1	2.3	2.3	2.0	2.2
10 Treasury Note Yield, 10-Yr	CONSENSUS	2.4	2.8	3.1	3.2	3.2	2.9	3.3
	Top 10 Average	2.8	3.3	3.7	3.8	3.9	3.5	4.2
	Bottom 10 Average	2.0	2.3	2.4	2.5	2.5	2.3	2.4
11 Treasury Bond Yield, 30-Yr	CONSENSUS	2.9	3.3	3.6	3.7	3.7	3.4	3.8
	Top 10 Average	3.4	3.9	4.3	4.4	4.4	4.1	4.6
	Bottom 10 Average	2.4	2.8	2.9	3.0	3.0	2.8	3.0
12 Corporate Aaa Bond Yield	CONSENSUS	3.7	4.2	4.5	4.6	4.8	4.4	4.9
	Top 10 Average	4.3	4.7	5.1	5.2	5.4	4.9	5.6
	Bottom 10 Average	3.2	3.7	3.9	4.1	4.2	3.8	4.2
13 Corporate Baa Bond Yield	CONSENSUS	4.6	5.0	5.3	5.5	5.6	5.2	5.7
	Top 10 Average	5.1	5.5	5.9	6.1	6.2	5.7	6.5
	Bottom 10 Average	4.0	4.5	4.8	4.9	5.0	4.7	5.0
14 State & Local Bonds Yield	CONSENSUS	3.2	3.7	3.9	4.1	4.2	3.8	4.3
	Top 10 Average	3.8	4.3	4.5	4.7	4.8	4.4	5.0
	Bottom 10 Average	2.7	3.2	3.4	3.5	3.6	3.3	3.6
15 Home Mortgage Rate	CONSENSUS	4.0	4.4	4.7	4.8	4.8	4.5	4.9
	Top 10 Average	4.5	5.0	5.3	5.4	5.4	5.1	5.7
	Bottom 10 Average	3.6	3.9	4.1	4.1	4.2	4.0	4.1
A Fed's AFE Nominal \$ Index	CONSENSUS	106.2	106.0	106.1	106.2	106.4	106.2	106.5
	Top 10 Average	108.1	108.4	108.9	109.0	109.2	108.7	110.1
	Bottom 10 Average	104.4	104.0	103.7	103.7	103.9	103.9	103.1
		Year-Over-Year, % Change					Five-Year Averages	
		2023	2024	2025	2026	2027	2023-2027	2028-2032
B. Real GDP	CONSENSUS	2.6	2.2	2.1	2.0	2.0	2.2	2.0
	Top 10 Average	3.1	2.6	2.5	2.4	2.3	2.6	2.4
	Bottom 10 Average	2.2	1.7	1.7	1.7	1.7	1.8	1.7
C. GDP Chained Price Index	CONSENSUS	2.5	2.2	2.2	2.1	2.1	2.2	2.1
	Top 10 Average	3.0	2.7	2.5	2.4	2.4	2.6	2.4
	Bottom 10 Average	2.0	1.9	1.9	1.9	1.9	1.9	1.8
D. Consumer Price Index	CONSENSUS	2.6	2.3	2.3	2.2	2.2	2.3	2.2
	Top 10 Average	3.2	2.8	2.6	2.5	2.5	2.7	2.5
	Bottom 10 Average	2.1	2.0	2.0	2.0	2.0	2.0	1.9
E. PCE Price Index	CONSENSUS	2.5	2.2	2.1	2.1	2.1	2.2	2.1
	Top 10 Average	3.0	2.6	2.4	2.4	2.3	2.6	2.4
	Bottom 10 Average	2.0	1.9	1.9	1.9	1.9	1.9	1.9

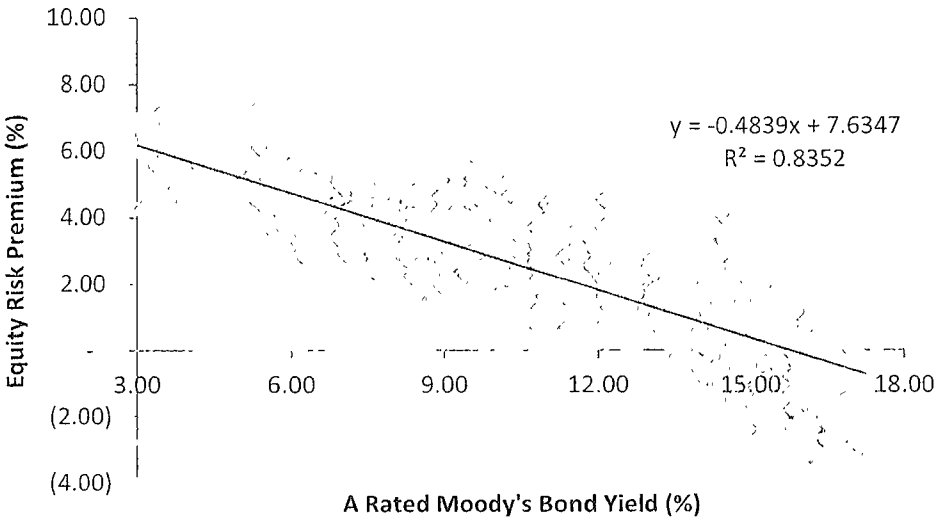


Oncor Electric Delivery Company LLC  
Derivation of Mean Equity Risk Premium Based Studies  
Using Holding Period Returns and  
Projected Market Appreciation of the S&P Utility Index

<u>Line No.</u>		<u>Implied Equity Risk Premium</u>
	<u>Equity Risk Premium based on S&amp;P Utility Index Holding Period Returns (1):</u>	
1.	Historical Equity Risk Premium	4.16 %
2.	Regression of Historical Equity Risk Premium (2)	6.04
3.	Forecasted Equity Risk Premium Based on PRPM (3)	5.27
4.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Value Line Data) (4)	6.33
5.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Bloomberg Data) (5)	<u>5.42</u>
6.	Average Equity Risk Premium (6)	<u><u>5.44 %</u></u>

- Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1928-2020. Holding period returns are calculated based upon income received (dividends and interest) plus the relative change in the market value of a security over a one-year holding period.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of the S&P Utility Index relative to Moody's A2 rated public utility bond yields from 1928 - 2020 referenced in note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is applied to the risk premium of the monthly total returns of the S&P Utility Index and the monthly yields on Moody's A2 rated public utility bonds from January 1928 - February 2022.
- (4) Using data from Value Line for the S&P Utilities Index, an expected total return of 10.69% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the expected A2 rated public utility bond yield of 4.36% results in an expected equity risk premium of 6.33%. (10.69% - 4.36 = 6.33%)
- (5) Using data from the Bloomberg Professional Service for the S&P Utilities Index, an expected total return of 9.78% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the expected A2 rated public utility bond yield of 4.36% results in an expected equity risk premium of 5.42%. (9.78% - 4.36 = 5.42%)
- (6) Average of lines 1 through 5.

Oncor Electric Delivery Company LLC  
Prediction of Equity Risk Premiums Relative to  
Moody's A2 Rated Utility Bond Yields



		Prospective A2 Rated Utility Bond (1)	Prospective Equity Risk Premium
Constant	Slope		
7.6347 %	-0.4839	4.36 %	5.52 %

Notes:  
(1) From line 3 of page 3 of this Exhibit.

Source of Information: Regulatory Research Associates

Oncor Electric Delivery Company LLC  
Indicated Common Equity Cost Rate Through Use  
of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fourteen Electric Companies	Value Line Adjusted Beta	Bloomberg Adjusted Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost
Alliant Energy Corporation	0.85	0.91	0.88	9.84 %	2.89 %	11.55 %	11.84 %	11.69 %
Ameren Corporation	0.80	0.88	0.84	9.84	2.89	11.15	11.55	11.35
American Electric Power Company, Inc.	0.75	0.90	0.82	9.84	2.89	10.96	11.40	11.18
Duke Energy Corporation	0.85	0.82	0.83	9.84	2.89	11.05	11.47	11.26
Edison International	0.95	1.05	1.00	9.84	2.89	12.73	12.73	12.73
Entergy Corporation	0.95	1.10	1.03	9.84	2.89	13.02	12.95	12.99
Evergy, Inc.	0.95	0.99	0.97	9.84	2.89	12.43	12.51	12.47
Eversource Energy	0.90	0.98	0.94	9.84	2.89	12.14	12.28	12.21
IDACORP, Inc.	0.80	0.92	0.86	9.84	2.89	11.35	11.69	11.52
NorthWestern Corporation	0.95	1.16	1.05	9.84	2.89	13.22	13.10	13.16
OGE Energy Corporation	1.05	1.20	1.12	9.84	2.89	13.91	13.61	13.76
Portland General Electric Company	0.90	0.93	0.92	9.84	2.89	11.94	12.14	12.04
The Southern Company	0.95	1.04	0.99	9.84	2.89	12.63	12.65	12.64
Xcel Energy Inc.	0.80	0.84	0.82	9.84	2.89	10.96	11.40	11.18
Mean			0.93			12.07 %	12.24 %	12.16 %
Median			0.93			12.04 %	12.21 %	12.13 %
Average of Mean and Median			0.93			12.06 %	12.23 %	12.15 %

Notes on page 2 of this Exhibit

Oncor Electric Delivery Company LLC  
Notes to Accompany the Application of the CAPM and ECAPM

Notes.

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

Historical Data MRP Estimates:

Measure 1: Ibbotson Arithmetic Mean MRP (1926-2020)

Arithmetic Mean Monthly Returns for Large Stocks 1926-2020:	12.20 %
Arithmetic Mean Income Returns on Long-Term Government Bonds:	5.05
MRP based on Ibbotson Historical Data:	<u>7.15 %</u>

Measure 2: Application of a Regression Analysis to Ibbotson Historical Data (1926-2020)

9.38 %

Measure 3: Application of the PRPM to Ibbotson Historical Data: (January 1926 - February 2022)

9.03 %

Value Line MRP Estimates:

Measure 4: Value Line Projected MRP (Thirteen weeks ending March 18, 2022)

Total projected return on the market 3-5 years hence*.	11.39 %
Projected Risk-Free Rate (see note 2):	2.89
MRP based on Value Line Summary & Index:	<u>8.50 %</u>
*Forecasted 3-5 year capital appreciation plus expected dividend yield	

Measure 5: Value Line Projected Return on the Market based on the S&P 500

Total return on the Market based on the S&P 500:	16.14 %
Projected Risk-Free Rate (see note 2):	2.89
MRP based on Value Line data	<u>13.25 %</u>

Measure 6. Bloomberg Projected MRP

Total return on the Market based on the S&P 500:	14.60 %
Projected Risk-Free Rate (see note 2):	2.89
MRP based on Bloomberg data	<u>11.71 %</u>

Average of Value Line, Ibbotson, and Bloomberg MRP: 9.84 %

- (2) For reasons explained in the direct testimony, the appropriate risk-free rate for cost of capital purposes is the average forecast of 30 year Treasury Bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts. (See pages 10-11 of Exhibit DWD-4.) The projection of the risk-free rate is illustrated below:

First Quarter 2022	2.20 %
Second Quarter 2022	2.50
Third Quarter 2022	2.60
Fourth Quarter 2022	2.70
First Quarter 2023	2.90
Second Quarter 2023	3.00
2023-2027	3.40
2028-2032	3.80
	<u>2.89 %</u>

- (3) Average of Column 6 and Column 7.

Sources of Information:

Value Line Summary and Index  
Blue Chip Financial Forecasts, March 1, 2022 and December 1, 2021  
Stocks, Bonds, Bills, and Inflation - 2021 SBBI Yearbook, John Wiley & Sons, Inc.  
Bloomberg Professional Services

Oncor Electric Delivery Company LLC  
Basis of Selection of the Group of Non-Price Regulated Companies  
Comparable in Total Risk to the Utility Proxy Group

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

The Non-Price Regulated Proxy Group companies were then selected based on the unadjusted beta range of 0.65 – 0.93 and residual standard error of the regression range of 2.5237 – 3.0101 of the Utility Proxy Group.

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

The standard deviation of the Electric Utility Proxy Group's residual standard error of the regression is 0.1216. The standard deviation of the standard error of the regression is calculated as follows:

$$\text{Standard Deviation of the Std. Err. of the Regr.} = \frac{\text{Standard Error of the Regression}}{\sqrt{2N}}$$

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

$$\text{Thus, } 0.1216 = \frac{2.7669}{\sqrt{518}} = \frac{2.7669}{22.7596}$$

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

Oncor Electric Delivery Company LLC  
Basis of Selection of Comparable Risk  
Domestic Non-Price Regulated Companies

	[1]	[2]	[3]	[4]
Proxy Group of Fourteen Electric Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Alliant Energy Corporation	0.85	0.71	2.6953	0.0667
Ameren Corporation	0.80	0.69	2.5235	0.0624
American Electric Power Company, Inc.	0.75	0.58	2.6108	0.0646
Duke Energy Corporation	0.85	0.75	2.6859	0.0664
Edison International	0.95	0.91	3.2986	0.0816
Entergy Corporation	0.95	0.86	2.7525	0.0681
Evergy, Inc.	0.95	0.85	3.0574	0.0778
Eversource Energy	0.90	0.82	3.0252	0.0748
IDACORP, Inc.	0.80	0.67	2.5897	0.0641
NorthWestern Corporation	0.95	0.89	2.7299	0.0675
OGE Energy Corporation	1.05	1.03	2.6847	0.0664
Portland General Electric Company	0.85	0.77	2.7744	0.0686
The Southern Company	0.95	0.87	2.6353	0.0652
Xcel Energy Inc.	0.80	0.65	2.6727	0.0661
Average	0.89	0.79	2.7669	0.0686
Beta Range (+/- 2 std. Devs. of Beta)	0.65	0.93		
2 std. Devs. of Beta	0.14			
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.5237	3.0101		
Std. dev. of the Res. Std. Err.	0.1216			
2 std. devs. of the Res. Std. Err.	0.2432			

Source of Information: Valueline Proprietary Database, March 2022

Oncor Electric Delivery Company LLC  
Proxy Group of Non-Price Regulated Companies  
Comparable in Total Risk to the  
Proxy Group of Fourteen Electric Companies

	[1]	[2]	[3]	[4]
Proxy Group of Forty-Eight Non-Price Regulated Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Agilent Technologies	0.90	0.78	2.7005	0.0668
Abbott Labs	0.90	0.82	2.8039	0.0694
Analog Devices	0.95	0.88	2.8212	0.0698
Assurant Inc.	0.90	0.84	2.7387	0.0677
Smith (A.O.)	0.85	0.77	2.8592	0.0707
Air Products & Chem.	0.90	0.79	2.6168	0.0647
Brown-Forman 'B'	0.90	0.80	2.7317	0.0676
Ball Corp.	0.95	0.91	2.8617	0.0708
Bristol-Myers Squibb	0.85	0.75	2.9154	0.0721
Broadridge Fin'l	0.85	0.73	2.7513	0.0681
Brady Corp.	1.00	0.92	2.7776	0.0687
CACI Int'l	0.90	0.84	2.8642	0.0709
Cerner Corp.	0.90	0.80	2.6984	0.0667
Chemed Corp.	0.85	0.70	2.8432	0.0703
CSW Industrials	0.90	0.80	2.8686	0.0710
Danaher Corp.	0.80	0.68	2.5298	0.0626
Dolby Labs.	0.95	0.88	2.6074	0.0645
Exponent, Inc.	0.90	0.79	3.0005	0.0742
FactSet Research	0.95	0.92	2.7561	0.0682
GATX Corp.	0.95	0.88	2.9561	0.0731
Gentex Corp	0.95	0.89	2.7619	0.0683
Alphabet Inc.	0.90	0.79	2.5405	0.0628
Ingredion Inc.	0.95	0.85	2.7688	0.0685
Hunt (J.B.)	0.95	0.91	2.8935	0.0716
J&J Snack Foods	0.95	0.86	3.0009	0.0742
Henry (Jack) & Assoc	0.85	0.70	2.9159	0.0721
McCormick & Co.	0.80	0.65	2.8247	0.0699
Monster Beverage	0.85	0.75	2.9659	0.0734
Motorola Solutions	0.90	0.79	2.6488	0.0655
Mettler-Toledo Int'l	0.95	0.91	2.8032	0.0693
Northrop Grumman	0.85	0.75	2.9830	0.0738
Old Dominion Freight	0.95	0.86	2.9874	0.0739
Pfizer, Inc	0.80	0.65	2.6589	0.0658
Packaging Corp.	0.95	0.89	2.8411	0.0703
Post Holdings	0.95	0.87	2.8860	0.0714
RLI Corp.	0.80	0.65	2.8568	0.0707
Service Corp. Int'l	0.95	0.88	2.7221	0.0673
Sherwin-Williams	0.90	0.84	2.5345	0.0627
Selective Ins. Group	0.90	0.81	2.9172	0.0722
Sirius XM Holdings	0.95	0.85	2.9761	0.0736
Sensient Techn.	0.90	0.82	2.6687	0.0660
Thermo Fisher Sci.	0.85	0.70	2.6150	0.0647
Texas Instruments	0.85	0.76	2.6869	0.0665
AMERCO	0.95	0.90	2.7432	0.0679
UniFirst Corp	0.95	0.90	2.7175	0.0672
VeriSign Inc.	0.90	0.79	2.6081	0.0645
Waters Corp.	0.95	0.88	2.8517	0.0705
Watsco, Inc.	0.85	0.74	2.6836	0.0664
Average	0.90	0.81	2.7900	0.0700
Proxy Group of Fourteen Electric Companies	0.89	0.79	2.7669	0.0686

Source of Information:

Valueline Proprietary Database, March 2022

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# **Comparable Earnings: New Life for an Old Precept**

by  
**Frank J. Hanley**  
**Pauline M. Ahern**

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# Comparable Earnings: New Life for an Old Precept

**A**ccelerating deregulation has greatly increased the investment risk of natural gas utilities. As a result, the authors believe it more appropriate than ever to employ the comparable earnings model. We believe our application of the model overcomes the greatest traditional objection to it — lack of comparability of the selected non-utility proxy firms. Our illustration focuses on a target gas pipeline company with a beta of 0.96 — almost equal to the market's beta of 1.00



## Introduction

The comparable earnings model used to determine a common equity cost rate is deeply rooted in the standard of "corresponding risk" enunciated in the landmark *Bluefield* and *Hope* decisions of the U.S. Supreme Court.<sup>1</sup> With such solid grounding in the foundations of rate of return regulation, comparable earnings should be accepted as a principal model, along with the currently popular market-based models, provided that its most common criticism, non-comparability of the proxy companies, is overcome.

Our comparable earnings model overcomes the non-comparability issue of the non-utility firms selected as a proxy for the target utility, in this example, a gas pipeline company. We should note that in the absence of common stock prices for the target utility (as with a wholly-owned subsidiary), it is appropriate to use the average of a proxy group of similar risk gas pipeline companies whose common stocks are actively traded. As we will demonstrate, our selection process results in a group of domestic, non-utility firms that is comparable in total risk, the sum of business and financial risk, which reflects both non-diversifiable systematic, or market, risk as well as diversifiable unsystematic, or firm-specific, risk.

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## Embedded in the Landmark Decisions

As stated in *Bluefield* in 1922: "A public utility is entitled to such rates as will permit it to earn a return . . . on investments in other business undertakings which are attended by corresponding risks and uncertainties . . ."

In addition, the court stated in *Hope* in 1944: "By that standard the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks "

Thus, the "corresponding risk" pre-

cept of *Bluefield* and *Hope* predates the use of such market-based cost-of-equity models as the Discounted Cash Flow (DCF) and Capital Asset Pricing (CAPM), which were developed later and are currently popular in rate-base/rate-of-return regulation. Consequently, the comparable earnings model has a longer regulatory and judicial history. However, it has far greater relevance now than ever before in its history because significant deregulation has substantially increased natural gas utilities' investment risk to a level similar to that of non-utility firms. As a result, it is

## Comparable Earnings from page 4

more important than ever to look to similar-risk non-utility firms for insight into common equity cost rate, especially in view of the deficiencies inherent in the currently popular market-based cost of common equity models, particularly the DCF model.

Despite the fact that the landmark decisions are still regarded as having set the standards for determining a fair rate of return, the comparable earnings model has experienced decreased usage by expert witnesses, as well as less regulatory acceptance over the years. We believe the decline in the popularity of the comparable earnings model, in large measure, is attributable to the difficulty of selecting non-utility proxy firms that regulators will accept as comparable to the target utility. Regulatory acceptance is difficult to gain when the selection process is arbitrary. Our application of the model is objective and consistent with fundamental financial tenets.

### Principles of Comparable Earnings

Regulation is a substitute for the competition of the marketplace. Moreover, regulated public utilities compete in the capital markets with all firms, including unregulated non-utilities. The comparable earnings model is based upon the opportunity cost principle; i.e., that the true cost of an investment is the return that could have been earned on the next best available alternative investment of similar risk. Consequently, the comparable earnings model is consistent with regulatory and financial principles, as it is a surrogate for the competition of the marketplace, and investors seek the greatest available rate of return for bearing similar risk.

The selection of comparable firms is the most difficult step in applying the comparable earnings model, as noted by Phillips<sup>2</sup> as well as by Bonbright, Daniels and Kamerschen.<sup>3</sup> The selection of non-utility proxy firms should result in a sufficiently broad-based group in order to minimize the effect of company-specific aberrations. How-

ever, if the selection process is arbitrary, it likely would result in a proxy group that is too broad-based, such as the Standard & Poor's 500 Composite Index or the Value Line Industrial Composite. The use of such groups would require subjective adjustments to the comparable earnings results to reflect risk differences between the group(s) and the target utility, a gas pipeline company in this example.

### Authors' Selection Criteria

We base the selection of comparable non-utility firms on market-based, objective, quantitative measures of risk resulting from market prices that subsume investors' assessments of all elements of risk. Thus, our approach is based upon the principle of risk and return; namely, that firms of comparable risk should be expected to earn comparable returns. It is also consistent with the "corresponding risk" standard established in *Bluefield* and *Hope*. We measure total investment risk as the sum of non-diversifiable systematic and diversifiable unsystematic risk. We use the unadjusted beta as a measure of systematic risk and the standard error of the estimate (residual standard error) as a measure of unsystematic risk. Both the unadjusted beta and the residual standard error are derived from a regression of the target utility's security returns relative to the market's returns, which takes the general form:

$$r_{it} = a_i + b_i r_{mt} + e_{it}$$

where:

- $r_{it}$  =  $t$ th observation of the  $i$ th utility's rate of return
- $r_{mt}$  =  $t$ th observation of the market's rate of return
- $e_{it}$  =  $t$ th random error term
- $a_i$  = constant least-squares regression coefficient
- $b_i$  = least-squares regression slope coefficient, the unadjusted beta.

As shown by Francis,<sup>4</sup> the total variance or risk of a firm's return,  $\text{Var}(r_i)$ , comes from two sources:

$$\text{Var}(r_i) = \text{total risk of } i\text{th asset}$$

$$\begin{aligned} &= \text{var}(a_i + b_i r_m + e) \\ &\quad \text{substituting } (a_i + b_i r_m + e) \\ &\quad \text{for } r_i \\ &= \text{var}(b_i r_m) + \text{var}(e) \text{ since } \\ &\quad \text{var}(a_i) = 0 \\ &= b_i^2 \text{var}(r_m) + \text{var}(e) \\ &\quad \text{since } \text{var}(b_i r_m) = b_i^2 \\ &\quad \text{var}(r_m) \\ &= \text{systematic} + \\ &\quad \text{unsystematic risk} \end{aligned}$$

Francis<sup>5</sup> also notes: "The term  $\sigma^2(r_i|r_m)$  is called the *residual variance around the regression line* in statistical terms or *unsystematic risk* in capital market theory language.  $\sigma^2(r_i|r_m) = \dots = \text{var}(e)$ . The residual variance is the squared standard error in regression language, a measure of unsystematic risk." Application of these criteria results in a group of non-utility firms whose average total investment risk is indeed comparable to that of the target gas pipeline.

As a measure of systematic risk, we use the Value Line unadjusted beta. Beta measures the extent to which market-wide or macro-economic events affect a firm's stock price. We use the unadjusted beta of the target utility as a starting point because it results from the regression of the target utility's security returns relative to the market's returns. Thus, the resulting standard deviation of beta relates to the unadjusted beta. We use the standard deviation of the unadjusted beta to determine the range around it as the selection criterion based on systematic risk.

We use the residual standard error of the regression as a measure of unsystematic risk. The residual standard error reflects the extent to which events specific to the firm's operations affect a firm's stock price. Thus, it is a measure of diversifiable, unsystematic, firm-specific risk.

### An Illustration of Authors' Approach

**Step One:** We begin our approach by establishing the selection criteria as a range of both unadjusted beta and residual standard error of the target gas

*continued on page 6*

## Comparable Earnings *from page 5*

pipeline company.

As shown in table 1, our target gas pipeline company has a Value Line unadjusted beta of 0.90, whose standard deviation is 0.1250. The selection criterion range of unadjusted beta is the unadjusted beta plus (+) and minus (-) three of its standard deviations. By using three standard deviations, 99.73 percent of the comparable unadjusted betas is captured

Three standard deviations of the target utility's unadjusted beta equals 0.38 ( $0.1250 \times 3 = 0.3750$ , rounded to 0.38). Consequently, the range of unadjusted betas to be used as a selection criteria is  $0.52 - 1.28$  ( $0.52 = 0.90 - 0.38$ ) and  $(1.28 = 0.90 + 0.38)$ .

Likewise, the selection criterion range of residual standard error equals the residual standard error plus (+) and

minus (-) three of its standard deviations. The standard deviation of the residual standard error is defined as:  $\sigma/\sqrt{2N}$

As also shown in table 1, the target gas pipeline company has a residual standard error of 3.7867. According to the above formula, the standard deviation of the residual standard error would be 0.1664 ( $0.1664 = 3.7867/\sqrt{2(259)} = 3.7867/22.7596$ , where  $259 = N$ , the number of weekly price change observations over a period of five years). Three standard deviations of the target utility's residual standard error would be 0.4992 ( $0.1664 \times 3 = .4992$ ). Consequently, the range of residual standard errors to be used as a selection criterion is  $3.2875 - 4.2859$  ( $3.2875 = 3.7867 - 0.4992$ ) and  $(4.2859 = 3.7867 + 0.4992)$

**Step Two:** The step one criteria are applied to Value Line's data base of nearly 4,000 firms for which Value Line derives unadjusted betas and residual standard errors on a weekly basis. All firms with unadjusted betas and residual standard errors within the criteria ranges are then selected

**Step Three:** In the regulatory ratemaking environment, authorized common equity return rates are applied to a book-value rate base. Thus, the earnings rates on book common equity, or net worth, of competitive, non-utility firms are highly relevant provided those firms are indeed comparable in total risk to the target gas pipeline. The use of the return rates of other utilities has no relevance because their allowed, and hence subsequently achieved, earnings rates are dependent upon the regulatory

table 1

### Summary of the Comparable Earnings Analysis for the Proxy Group of 248 Non-Utility Companies Comparable in Total Risk to the Target Gas Pipeline Company<sup>1</sup>

	1	2	3	4	5	6	7	8
	adj. beta	unadj. beta	residual standard error	3-year average <sup>2</sup>	4-year average <sup>2</sup>	5-year average <sup>2</sup>	5-year projected <sup>3</sup>	
average for the proxy group of 248 non-utility companies comparable in total risk to the target gas pipeline company	0.97	0.92	3.7705					
target gas pipeline company	0.96	0.90 <sup>4</sup>	3.7867					
median				11.7%	12.0%	12.6%	15.5%	
average of the median historical returns					12.1%			
conclusion <sup>5</sup>								13.8%

<sup>1</sup> The criteria for selection of the non-utility group was that the non-utility companies be domestic and included in Value Line Investment Survey. The non-utility group was selected based on an unadjusted beta range of 0.52 to 1.28 and a residual standard error range of 3.2875 to 4.2859.

<sup>2</sup> Ending 1992.

<sup>3</sup> 1996-1998/1997-1999.

<sup>4</sup> The average standard deviation of the target gas pipeline company's unadjusted beta is 0.1250.

<sup>5</sup> Equal weight given to both the average of the 3-, 4- and 5-year historical medians (12.1%) and 5-year projected median rate of return on net worth (15.5%). Thus,  $13.8\% = (12.1\% + 15.5\%) / 2$ .

Source: Value Line Inc., March 15, 1994.  
Value Line Investment Survey.

## Comparable Earnings *from page 6*

process. Consequently, we believe all utilities must be eliminated to avoid circularity. Moreover, we believe non-domestic firms must be eliminated because their reporting methods differ significantly from U.S. firms.

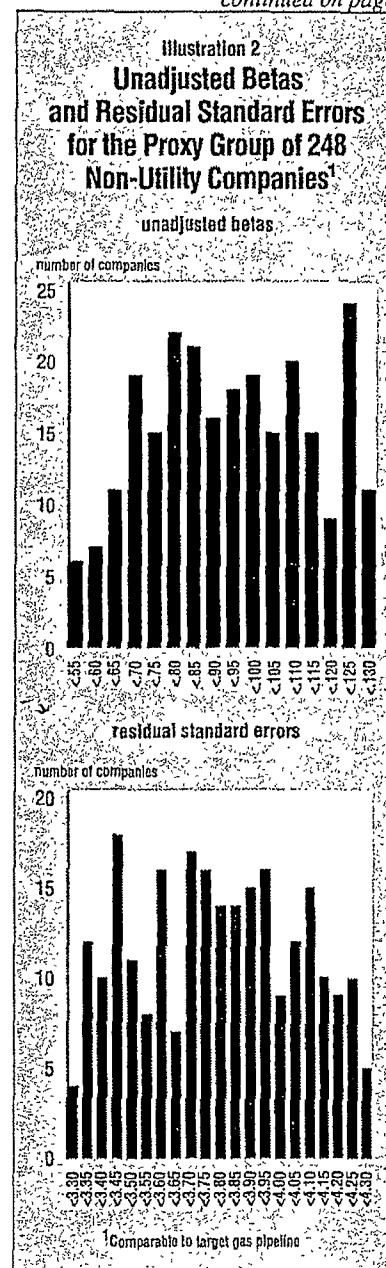
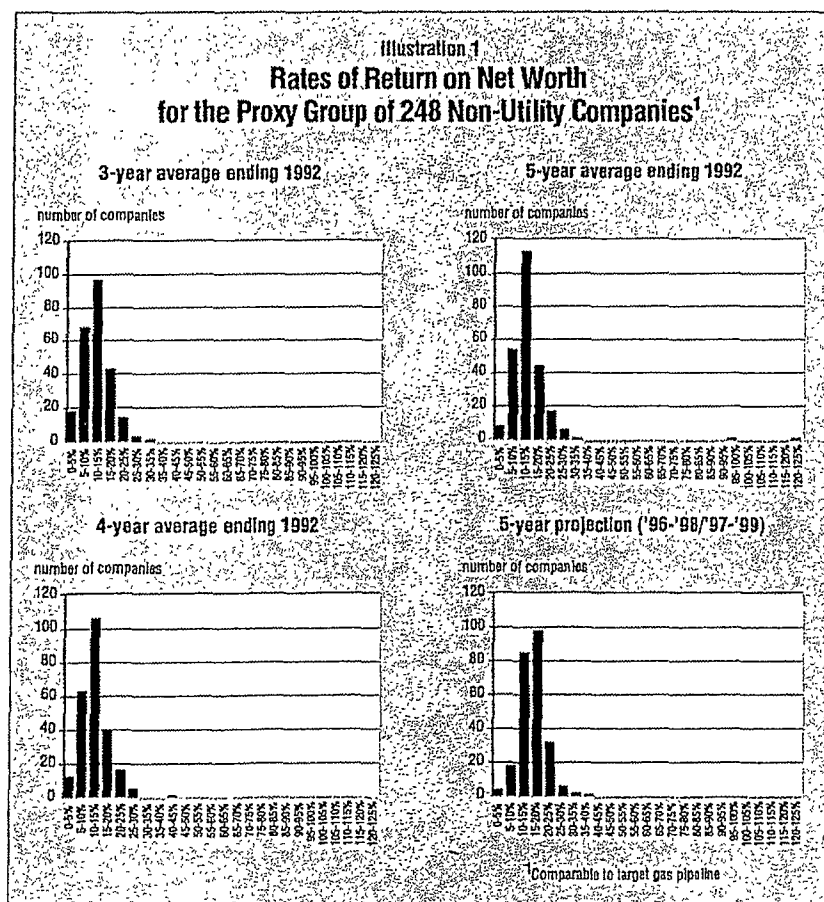
**Step Four:** We then eliminated those firms for which Value Line does not publish a "Ratings & Report" in *Value Line Investment Survey* so that the historical and projected returns on net worth<sup>6</sup> are from a consistent source. We use historical returns on net worth for the most recent five years, as well as those projected three to five years into the future. We believe it is logical to evaluate both historical and projected return rates because it is reasonable to assume that investors avail themselves of both when they are available from widely disseminated information ser-

vices, such as Value Line Inc. The use of Value Line's return rates on net worth understates the common equity return rates for two reasons. First, preferred stock is included in net worth. Second, the net worth return rates are as of the end of each period. Thus, the use of average common equity return rates would yield higher results.

**Step Five:** Median returns based on the historical average three, four and five years ending 1992 and projected 1996-1998 or 1997-1999 rates of return on net worth are then determined as shown in columns 4 through 7 of table 1. The median is used due to the wide variations and skewness in rates of return on net worth for the non-utility firms as evidenced by the frequency distributions of those returns as shown in illustration 1.

However, we show the average unadjusted beta, 0.92, and residual standard error, 3.7705, for the proxy group in columns 2 and 3 of table 1 because their frequency distributions are not significantly skewed, as shown in illustration 2.

**Step Six:** Our conclusion of a com-  
*continued on page 8*



## Comparable Earnings from page 7

comparable earnings cost rate is based upon the mid-point of the average of the median three-, four- and five-year historical rates of return on net worth of 12.1 percent as shown in column 5 and the median projected 1996-1998/1997-1999 rate of return on net worth of 15.5 percent as shown in column 7 of table 1. As shown in column 8, it is 13.8 percent.

### Summary

Our comparable earnings approach demonstrates that it is possible to select a proxy group of non-utility firms that is comparable in total risk to a target utility. In our example, the 13.8 percent comparable earnings cost rate is very conservative as it is an expected achieved rate on book common equity (a regulatory allowed rate should be

greater) and because it is based on end-of-period net worth. A similar rate on average net worth would be about 20 to 40 basis points higher (i.e., 14.0 to 14.2 percent) and still understate the appropriate regulatory allowed rate of return on book common equity.

Our selection criteria are based upon measures of systematic and unsystematic risk, specifically unadjusted beta and residual standard error. They provide the basis for the objective selection of comparable non-utility firms. Our selection criteria rely on changes in market prices over approximately five years. We compare the aggregate total risk, or the sum of systematic and unsystematic risk, which reflects investors' aggregate assessment of both business and financial risk. Thus, no adjustments are necessary to the proxy group results to

compensate for the differences in business risk and financial risk, such as accounting practices and debt/equity ratios. Moreover, it is inappropriate to attempt a comparison of the target utility with any individual firm, or subset of firms, in the proxy group because only the average firm of the group is relevant.

Because the comparable earnings model is firmly anchored in the "corresponding risk" precept established in the landmark court decisions, it is worthy of consideration as a principal model for use in estimating the cost rate of common equity capital of a regulated utility. Our approach to the comparable earnings model produces a proxy group that is indeed comparable in total risk because the selection process is objective and quantitative. It therefore overcomes criticism linked to arbitrary selection processes.

All cost-of-common-equity models, including the DCF and CAPM, are fraught with deficiencies, usually stemming from the many necessary but unrealistic assumptions that underlie them. The effects of the deficiencies of individual models can be mitigated by using more than one model when estimating a utility's common equity cost rate. Therefore, when the non-comparability issue is overcome, the comparable earnings model deserves to receive the same consideration as a primary model, as do the currently popular market-based models. ■

## Report Lists Pipeline, Storage Projects

More than \$9 billion worth of projects to expand the nation's natural gas pipeline network are in various stages of development, according to an A.G.A. report. These projects involve nearly 8,000 miles of new pipelines and capacity additions to existing lines and represent 15.3 billion cubic feet (Bcf) per day of new pipeline capacity.

During 1993 and early 1994, construction on 3,100 miles of pipeline was completed or under way, at a cost of nearly \$4 billion, says A.G.A. These projects are adding 5.4 Bcf in daily delivery capacity nationwide.

Among the projects completed in 1993 were Pacific Gas Transmission Co.'s 805 miles of looping that allows increased deliveries of Canadian gas to the West Coast; Northwest Pipeline Corp.'s addition of 433 million cubic feet of daily capacity for customers in the Pacific Northwest and Rocky Mountain areas; and the 156-mile Empire State Pipeline in New York.

In addition, major construction projects were started on the systems of Texas Eastern Transmission Corp. and Algonquin Gas Transmission Co. — both subsidiaries of Panhandle Eastern Corp. — and along Florida Gas Transmission Co.'s pipeline.

The report goes on to discuss another \$5 billion in proposed projects, which, if completed, will add nearly 5,000 miles of pipeline and 9.8 Bcf per day in capacity, much of it serving Florida and West Coast markets.

A.G.A. also identifies 47 storage projects and says that if all of them are built, existing storage capacity will increase by more than 500 Bcf, or 15 percent.

For a copy of *New Pipeline Construction: Status Report 1993-94* (#F00103), call A.G.A. at (703) 841-8490. Price per copy is \$6 for employees of member companies and associates and \$12 for other customers.

<sup>1</sup> *Bluefield Water Works Improvement Co. v. Public Service Commission*, 262 U.S. 679 (1922) and *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 519 (1944).

<sup>2</sup> Charles F. Phillips Jr., *The Regulation of Public Utilities: Theory and Practice*, Public Utilities Reports Inc., 1988, p. 379.

<sup>3</sup> James C. Bonbright, Albert L. Danielsen and David R. Kamerschen, *Principles of Public Utilities Rates*, 2nd edition, Public Utilities Reports Inc., 1988, p. 329.

<sup>4</sup> Jack Clark Francis, *Investments: Analysis and Management*, 3rd edition, McGraw-Hill Book Co., 1980, p. 363.

<sup>5</sup> *Id.*, p. 548.

<sup>6</sup> Returns on net worth must be used when relying on Value Line data because returns on book common equity for non-utility firms are not available from Value Line.



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Investments:  
Analysis and  
Management

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Fifth Edition

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Jack Clark Francis

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### Investments: Analysis and Management

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**Beta Measurements** The beta coefficient is an *index of systematic risk*. Beta coefficients may be used for ranking the systematic risk of different assets. If the beta is larger than 1,  $b > 1.0$ , then the asset is more volatile than the market and is called an **aggressive asset**. If the beta is less than 1,  $b < 1.0$ , the asset is a **defensive asset**; its price fluctuations are less volatile than the market's. Figure 10-1 illustrates the characteristic lines for three different assets that have low, medium, and high levels of beta (or undiversifiable risk).

Figure 10-2 shows that IBM is a stock with an average amount of systematic risk. IBM's beta of 1.02 indicates that its return tends to increase 2 percent more than the return on the market average when the market is rising. When the market falls, IBM's return tends to fall 2 percent more than the market's. The characteristic line for IBM has an above average correlation coefficient of  $\rho = .7495$ , indicating that the returns on this security follow its particular characteristic line slightly more closely than those of the average stock.

#### Partitioning Risk

Total risk can be measured by the variance of returns, denoted  $\text{Var}(r)$ . This measure of *total risk* is *partitioned into its systematic and unsystematic components in Equation (10-8)*.<sup>7</sup>

$$\begin{aligned}\text{Var}(r_i) &= \text{total risk of } i\text{th asset} \\ &= \text{Var}(a_i + b_i r_{m,t} + e_{i,t}) \\ &\quad \text{by substituting } (a_i + b_i r_{m,t} + e_{i,t}) \text{ for } r_{i,t} \\ &= 0 + \text{Var}(b_i r_{m,t}) + \text{Var}(e_{i,t}) \\ &\quad \text{since } \text{Var}(a_i) = 0 \\ &= b_i^2 \text{Var}(r_m) + \text{Var}(e) \quad \text{since } \text{Var}(b_i r_m) = b_i^2 \text{Var}(r_m) \\ &= \text{systematic} + \text{unsystematic risk} \\ .01389 &= .00780 + .00609 \quad \text{for IBM}\end{aligned}\tag{10-8}$$

The unsystematic risk measure  $\text{Var}(e)$  is called in regression language the *residual variance* or, synonymously, the *standard error squared*.

**Undiversifiable Proportion** The percentage of total risk that is systematic can be measured by the coefficient of determination  $\rho^2$  (that is, the characteristic line's squared correlation coefficient).

<sup>7</sup>In this context, **partition** is a technical statistical term that means to divide the total variance into *mutually exclusive* and *exhaustive* pieces. This partition is only possible if the returns from the market are statistically independent from the residual error terms that occur simultaneously,  $\text{Cov}(r_{m,t}, e_{i,t}) = 0$ . The mathematics of regression analysis will orthogonalize the residuals and thus ensure that the needed statistical independence exists.



$$\frac{\text{Systematic risk}}{\text{Total risk}} = \frac{b_i^2 \text{Var}(r_m)}{\text{Var}(r_i)} = \rho^2 \quad (10-9)$$

$$\frac{.007802}{.01389} = \frac{(1.021)^2 (.00749)}{.00749} = .5617 \times 100 = 56.17\% \quad \text{for IBM}$$

**Diversifiable Proportion** The percentage of unsystematic risk equals  $(1.0 - \rho^2)$ .

$$\frac{\text{Unsystematic risk}}{\text{Total risk}} = \frac{\text{Var}(e)}{\text{Var}(r_i)} = (1.0 - \rho^2)$$

$$\frac{.00609}{.01389} = (1.0 - .5617) = .438 \times 100 \quad (10-10)$$

$$= 43.8\% \text{ unsystematic} \quad \text{for IBM}$$

Studies of the characteristic lines of hundreds of stocks listed on the NYSE indicate that the average correlation coefficient is approximately  $\rho = .5$ .<sup>8</sup> This means that about  $\rho^2 = 25$  percent of the total variability of return in most NYSE securities is explained by movements in the market.

	NYSE average	IBM
Systematic risk: $\rho^2$	.25	.5617
Unsystematic risk: $(1.0 - \rho^2)$	.75	.4383
Total risk: 100%	1.00	1.0000

As explained above, systematic changes are common to all stocks and are therefore undiversifiable.

A primary use of the characteristic line (or *market model*, or the *single-index model*, as it is also called) is to assess the risk characteristics of one asset.<sup>9</sup> The statistics in Table 10-2, for instance, indicate that IBM's common stock is slightly more risky than the average common stock in terms of total risk and

<sup>8</sup>The average  $\rho$  was found to be about .5, as reported in Marshall Blume, "On the Assessment of Risk," *Journal of Finance*, March 1971, p. 4. For similar estimates, see J. C. Francis, "Statistical Analysis of Risk Surrogates for NYSE Stocks," *Journal of Financial and Quantitative Analysis*, Dec. 1979.

<sup>9</sup>Professor Jensen reformulated the characteristic line in a risk-premium form. See M. C. Jensen, "The Performance of Mutual Funds in the Period 1945 through 1964," *Journal of Finance*, May 1968, pp. 389-416. See also M. C. Jensen, "Risk, the Pricing of Capital Assets, and the Evaluation of Investment Portfolios," *Journal of Business*, vol. XLII, 1969. Jensen interprets the alpha intercept term of the characteristic line, as he formulates it, as an investment performance measure. It has been suggested that Jensen's performance measure is biased. See Keith V. Smith and Dennis A. Tito, "Risk-Return Measures of Ex-Post Portfolio Performance," *Journal of Financial and Quantitative Analysis*, Dec. 1969, vol. IV, no. 4, p. 466.

systematic risk.<sup>10</sup> New risk measurements must be made periodically, however, because the risk and return of an asset may change with the passage of time.<sup>11</sup>

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**10-3 CAPITAL ASSET PRICING MODEL (CAPM)**


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An old axiom states “there is no such thing as a free lunch.” This means that you cannot expect to get something for nothing—a rule that certainly applies to investment returns. Investors who want to earn high average rates of return must take high risks and endure the associated loss of sleep, the possibility of ulcers, and the chance of bankruptcy. The question to which we now turn is: Should investors worry about total risk, undiversifiable risk, diversifiable risk, or all three?

In Chapter 1 it was suggested that *investors should seek investments that have the maximum expected return in their risk class*. Their happiness from investing is presumed to be derived as indicated in the expected utility  $E(U)$  function below.

$$E(U) = f[E(r), \sigma]$$

The investment preferences of wealth-seeking risk-averse investors represented by the function above cause them to maximize their expected utility (or, equivalently, happiness) by (1) maximizing their expected return in any given risk class,  $\partial E(U)/\partial E(r) > 0$ , or, conversely, (2) minimizing their total risk at any given rate of expected return,  $\partial E(U)/\partial \sigma < 0$ . However, in selecting individual assets, investors will not be particularly concerned with the asset's total risk  $\sigma$ . Figure 9-1 showed that the unsystematic portion of total risk can be easily diversified by holding a portfolio of different securities. But, systematic risk affects all stocks in the market because it is undiversifiable. Portfolio theory therefore suggests that only the undiversifiable (or systematic) risk is worth avoiding.<sup>12</sup>

<sup>10</sup>Statements about the relative degree of total risk are made in the context of a long-run horizon—that is, over at least one *complete business cycle*. Obviously, an accurate short-run forecast which says that some particular company will go bankrupt next quarter makes it more risky than IBM, although IBM may have had more historical variability of return.

<sup>11</sup>Empirical studies documenting the intertemporal instability of betas have been published. Marshall Blume, “Betas and Their Regression Tendencies,” *Journal of Finance*, June 1975, pp. 785–795. See also J. C. Francis, “Statistical Analysis of Risk Coefficients for NYSE Stocks,” *Journal of Financial and Quantitative Analysis*, Dec. 1979, vol. XIV, no. 5, pp. 981–997. An appendix at the end of this chapter reviews some evidence about shifting betas, standard deviations, and correlations.

<sup>12</sup>Both the systematic and unsystematic portions of total risk must be considered by **undiversified investors**. Entrepreneurs who have their entire net worth invested in one business, for example, can be bankrupted by a piece of bad luck that could be easily averaged away to zero in a diversified portfolio. Poorly diversified investors should not treat diversifiable risk lightly. Only well-diversified investors can afford to ignore diversifiable risk.

Oncor Electric Delivery Company LLC  
Summary of Cost of Equity Models Applied to  
Proxy Group of Forty-Eight Non-Price Regulated Companies  
Comparable in Total Risk to the  
Proxy Group of Fourteen Electric Companies

<u>Principal Methods</u>	<u>Proxy Group of Forty-Eight Non- Price Regulated Companies</u>
Discounted Cash Flow Model (DCF) (1)	12.70 %
Risk Premium Model (RPM) (2)	12.73
Capital Asset Pricing Model (CAPM) (3)	<u>12.07</u>
Mean	<u><u>12.50 %</u></u>
Median	<u><u>12.70 %</u></u>
Average of Mean and Median	<u><u>12.60 %</u></u>

Notes:

- (1) From page 2 of this Exhibit.
- (2) From page 3 of this Exhibit.
- (3) From page 6 of this Exhibit.

Oncor Electric Delivery Company LLC  
DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Fourteen Electric Companies

	[1]	[2]	[3]	[5]	[6]	[7]	[8]
Proxy Group of Forty-Eight Non-Price Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (1)
Agilent Technologies	0.60 %	11.50 %	9.00 %	13.61 %	11.37 %	0.63 %	12.00 %
Abbott Labs.	1.49	10.00	7.80	12.12	9.97	1.56	11.53
Analog Devices	1.87	11.00	12.30	14.71	12.67	1.99	14.66
Assurant Inc	1.70	15.50	17.70	17.70	16.97	1.84	18.81
Smith (A.O.)	1.49	11.00	9.00	8.00	9.33	1.56	10.89
Air Products & Chem.	2.45	12.00	12.20	11.20	11.80	2.59	14.39
Brown-Forman 'B'	1.12	13.00	NA	7.01	10.01	1.18	11.19
Ball Corp.	0.88	21.00	5.00	14.78	13.59	0.94	14.53
Bristol-Myers Squibb	3.28	12.50	6.80	5.00	8.10	3.41	11.51
Broadridge Fin'l	1.63	9.00	NA	11.80	10.40	1.71	12.11
Brady Corp	1.81	9.50	7.00	7.00	7.83	1.88	9.71
CACI Int'l	-	10.50	3.80	2.40	5.57	-	NA
Cerner Corp	1.17	9.50	12.80	13.52	11.94	1.24	13.18
Chemed Corp	0.30	9.50	8.30	6.60	8.13	0.31	8.44
CSW Industrials	0.51	14.00	NA	12.00	13.00	0.54	13.54
Danaher Corp.	0.35	22.00	20.50	16.87	19.79	0.38	20.17
Dolby Labs	1.21	10.50	13.00	16.00	13.17	1.29	14.46
Exponent, Inc.	0.98	12.00	NA	15.00	13.50	1.05	14.55
FactSet Research	0.77	9.50	8.40	9.75	9.22	0.81	10.03
GATX Corp	1.95	5.50	NA	12.00	8.75	2.04	10.79
Gentex Corp	1.51	10.00	12.80	15.80	12.87	1.61	14.48
Alphabet Inc	-	23.50	19.80	14.10	19.13	-	NA
Ingredion Inc	2.83	7.50	NA	10.50	9.00	2.96	11.96
Hunt (J.B.)	0.81	11.00	15.00	28.04	18.01	0.88	18.89
J&J Snack Foods	1.63	8.50	NA	6.00	7.25	1.69	8.94
Henry (Jack) & Assoc	1.14	10.50	17.00	14.00	13.83	1.22	15.05
McCormick & Co	1.52	6.00	6.10	7.20	6.43	1.57	8.00
Monster Beverage	-	13.00	15.90	14.01	14.30	-	NA
Motorola Solutions	1.34	8.00	9.00	14.27	10.42	1.41	11.83
Mettler-Toledo Int'l	-	13.50	19.10	17.80	16.80	-	NA
Northrop Grumman	1.55	7.50	6.20	4.80	6.17	1.60	7.77
Old Dominion Freight	0.38	12.00	15.80	24.81	17.54	0.41	17.95
Pfizer, Inc	3.05	11.50	12.50	103.51	12.00	3.23	15.23
Packaging Corp	2.79	9.00	5.00	16.40	10.13	2.93	13.06
Post Holdings	-	16.50	NA	26.40	21.45	-	NA
RLI Corp	0.95	12.00	NA	9.80	10.90	1.00	11.90
Service Corp. Int'l	1.57	6.50	8.70	7.06	7.42	1.63	9.05
Sherwin-Williams	0.83	11.50	12.40	14.00	12.63	0.88	13.51
Selective Ins. Group	1.40	11.00	NA	13.40	12.20	1.49	13.69
Sirius XM Holdings	1.40	30.50	9.70	9.75	16.65	1.52	18.17
Sensient Techn	1.90	2.50	NA	3.80	3.15	1.93	5.08
Thermo Fisher Sci	0.21	15.50	14.00	10.87	13.46	0.22	13.68
Texas Instruments	2.60	9.00	9.30	10.00	9.43	2.72	12.15
AMERCO	-	11.50	NA	15.00	13.25	-	NA
UniFirst Corp.	0.64	5.50	NA	10.00	7.75	0.66	8.41
VeriSign Inc.	-	8.50	NA	8.00	8.25	-	NA
Waters Corp	-	6.00	8.50	10.00	8.17	-	NA
Watsco, Inc	2.73	11.00	NA	15.00	13.00	2.91	15.91
						Mean	12.78 %
						Median	12.61 %
						Average of Mean and Median	12.70 %

NA= Not Available  
NMF= Not Meaningful Figure

(1) The application of the DCF model to the domestic, non-price regulated comparable risk companies is identical to the application of the DCF to the Utility Proxy Group. The dividend yield is derived by using the 60 day average price and the spot indicated dividend as of March 18, 2022. The dividend yield is then adjusted by 1/2 the average projected growth rate in EPS, which is calculated by averaging the 5 year projected growth in EPS provided by Value Line, www.zacks.com, and www.yahoo.com (excluding any negative growth rates) and then adding that growth rate to the adjusted dividend yield.

Source of Information      Value Line Investment Survey  
www.zacks.com Downloaded on 03/18/2022  
www.yahoo.com Downloaded on 03/18/2022

Oncor Electric Delivery Company LLC  
Indicated Common Equity Cost Rate  
Through Use of a Risk Premium Model  
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Forty- Eight Non-Price Regulated Companies</u>
1.	Prospective Yield on Baa2 Rated Corporate Bonds (1)	4.71 %
2.	Adjustment to Reflect Bond rating Difference of Non-Price Regulated Companies (2)	(0.12)
3.	Adjusted Prospective Bond Yield	4.59
4.	Equity Risk Premium (3)	8.14
5.	Risk Premium Derived Common Equity Cost Rate	12.73 %

Notes: (1) Average forecast of Baa corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated March 1, 2022 and December 1, 2021 (see pages 10-11 of Exhibit DWD-4). The estimates are detailed below.

First Quarter 2022	3.90 %
Second Quarter 2022	4.20
Third Quarter 2022	4.40
Fourth Quarter 2022	4.60
First Quarter 2023	4.80
Second Quarter 2023	4.90
2023-2027	5.20
2028-2032	5.70
Average	4.71 %

(2) The average yield spread of Baa2 rated corporate bonds over A2 corporate bonds for the three months ending February 2022. To reflect the Baa1 average rating of the non-utility proxy group, the prospective yield on Baa2 corporate bonds must be adjusted by 1/3 of the spread between A2 and Baa2 corporate bond yields as shown below:

	A2 Corp. Bond Yield	Baa2 Corp. Bond Yield	Spread
Feb-22	3.60 %	3.97 %	0.37 %
Jan-22	3.25	3.59	0.34
Dec-21	2.97	3.30	0.33
	Average yield spread		0.35
	1/3 of spread		0.12

(2) From page 5 of this Exhibit.

Oncor Electric Delivery Company LLC  
Comparison of Long-Term Issuer Ratings for the  
Proxy Group of Forty-Eight Non-Price Regulated Companies of Comparable risk to the  
Proxy Group of Fourteen Electric Companies

Proxy Group of Forty-Eight Non-Price Regulated Companies	Moody's Long-Term Issuer Rating March 2022		Standard & Poor's Long-Term Issuer Rating March 2022	
	Long-Term Issuer Rating	Numerical Weighting (1)	Long-Term Issuer Rating	Numerical Weighting (1)
Agilent Technologies	Baa2	9.0	BBB+	8.0
Abbott Labs	A1	5.0	AA-	4.0
Analog Devices	A3	7.0	A-	7.0
Assurant Inc.	Baa3	10.0	BBB	9.0
Smith (A.O.)	NA	--	NA	--
Air Products & Chem.	A2	6.0	A	6.0
Brown-Forman 'B'	A1	5.0	A-	7.0
Ball Corp.	Ba1	11.0	BB+	11.0
Bristol-Myers Squibb	A2	6.0	A+	5.0
Broadridge Fin'l	Baa1	8.0	BBB+	8.0
Brady Corp	NA	--	NA	--
CACI Int'l	NA	--	BB+	11.0
Cerner Corp	NA	--	NA	--
Chemed Corp.	WR	--	NR	--
CSW Industrials	NA	--	NA	--
Danaher Corp.	Baa1	8.0	BBB+	8.0
Dolby Labs.	NA	--	NA	--
Exponent, Inc	NA	--	NA	--
FactSet Research	Baa3	10.0	NA	--
GATX Corp	Baa2	9.0	BBB	9.0
Gentex Corp.	NA	--	NA	--
Alphabet Inc	Aa2	3.0	AA+	2.0
Ingredion Inc	Baa1	8.0	BBB	9.0
Hunt (J.B.)	Baa1	8.0	BBB+	8.0
J&J Snack Foods	NA	--	NA	--
Henry (Jack) & Assoc	NA	--	NA	--
McCormick & Co	Baa2	9.0	BBB	9.0
Monster Beverage	NA	--	NA	--
Motorola Solutions	Baa3	10.0	BBB-	10.0
Mettler-Toledo Int'l	WR	--	NR	--
Northrop Grumman	Baa1	8.0	BBB+	8.0
Old Dominion Freight	NA	--	NA	--
Pfizer, Inc	A2	6.0	A+	5.0
Packaging Corp.	Baa2	9.0	BBB	9.0
Post Holdings	B2	15.0	B+	14.0
RLI Corp	Baa2	9.0	BBB	9.0
Service Corp. Int'l	Ba3	13.0	BB+	11.0
Sherwin-Williams	Baa2	9.0	BBB	9.0
Selective Ins. Group	Baa2	9.0	BBB	9.0
Sirius XM Holdings	NA	--	BB	12.0
Sensient Techn.	WR	--	NR	--
Thermo Fisher Sci.	A3	7.0	BBB+	8.0
Texas Instruments	Aa3	4.0	A+	5.0
AMERCO	WR	--	NR	--
UniFirst Corp.	NA	--	NA	--
VeriSign Inc.	Baa3	10.0	BBB	9.0
Waters Corp.	NA	--	NA	--
Watsco, Inc.	NA	--	NA	--
Average	Baa1	8.3	BBB+	8.2

Notes  
(1) From page 6 of Exhibit DWD-4

Source of Information  
Bloomberg Professional Services

Oncor Electric Delivery Company LLC  
Derivation of Equity Risk Premium Based on the Total Market Approach  
Using the Beta for  
Proxy Group of Forty-Eight Non-Price Regulated Companies of Comparable risk to the  
Proxy Group of Fourteen Electric Companies

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Forty-Eight Non- Price Regulated Companies</u>
<u>Ibbotson-Based Equity Risk Premiums:</u>		
1.	Ibbotson Equity Risk Premium (1)	5.92 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.23
3.	Ibbotson Equity Risk Premium based on PRPM (3)	8.07
4.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (4)	7.44
5	Equity Risk Premium Based on <u>Value Line</u> S&P 500 Companies (5)	12.19
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>10.65</u>
7.	Conclusion of Equity Risk Premium	8.75 %
8.	Adjusted Beta (7)	<u>0.93</u>
9.	Forecasted Equity Risk Premium	<u><u>8.14 %</u></u>

Notes:

- (1) From note 1 of page 9 of Exhibit DWD-4.
- (2) From note 2 of page 9 of Exhibit DWD-4.
- (3) From note 3 of page 9 of Exhibit DWD-4.
- (4) From note 4 of page 9 of Exhibit DWD-4.
- (5) From note 5 of page 9 of Exhibit DWD-4.
- (6) From note 6 of page 9 of Exhibit DWD-4.
- (7) Average of mean and median beta from page 6 of this Exhibit.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2021 SBBI Yearbook, John Wiley & Sons, Inc.  
Value Line Summary and Index  
Blue Chip Financial Forecasts, March 1, 2022 and December 1, 2021  
Bloomberg Professional Services

Oncor Electric Delivery Company LLC  
Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Fourteen Electric Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Forty-Eight Non-Price Regulated Companies	Value Line Adjusted Beta	Bloomberg Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
Agilent Technologies	0.90	0.98	0.94	9.84 %	2.89 %	12.14 %	12.28 %	12.21 %
Abbott Labs	0.90	0.79	0.84	9.84	2.89	11.15	11.55	11.35
Analog Devices	0.95	1.08	1.01	9.84	2.89	12.83	12.80	12.81
Assurant Inc.	0.95	0.93	0.94	9.84	2.89	12.14	12.28	12.21
Smith (A.O.)	0.85	1.06	0.95	9.84	2.89	12.24	12.36	12.30
Air Products & Chem	0.90	0.90	0.90	9.84	2.89	11.74	11.99	11.87
Brown-Forman 'B'	0.90	0.96	0.93	9.84	2.89	12.04	12.21	12.12
Ball Corp	0.95	1.02	0.98	9.84	2.89	12.53	12.58	12.55
Bristol-Myers Squibb	0.85	0.64	0.74	9.84	2.89	10.17	10.81	10.49
Broadridge Fin'l	0.85	0.85	0.85	9.84	2.89	11.25	11.62	11.44
Brady Corp	1.00	1.17	1.08	9.84	2.89	13.51	13.32	13.42
CACI Int'l	0.90	0.92	0.91	9.84	2.89	11.84	12.06	11.95
Cerner Corp.	0.90	0.75	0.82	9.84	2.89	10.96	11.40	11.18
Chemed Corp.	0.85	0.90	0.88	9.84	2.89	11.55	11.84	11.69
CSW Industrials	0.90	1.07	0.99	9.84	2.89	12.63	12.65	12.64
Danaher Corp.	0.80	0.82	0.81	9.84	2.89	10.86	11.33	11.09
Dolby Labs.	0.95	0.88	0.91	9.84	2.89	11.84	12.06	11.95
Exponent, Inc	0.90	1.01	0.95	9.84	2.89	12.24	12.36	12.30
FactSet Research	0.95	0.94	0.94	9.84	2.89	12.14	12.28	12.21
GATX Corp.	0.95	0.97	0.96	9.84	2.89	12.33	12.43	12.38
Gentex Corp.	0.95	1.09	1.02	9.84	2.89	12.92	12.87	12.90
Alphabet Inc.	0.90	0.98	0.94	9.84	2.89	12.14	12.28	12.21
Ingredion Inc	0.90	0.83	0.86	9.84	2.89	11.35	11.69	11.52
Hunt (J.B.)	0.95	0.99	0.97	9.84	2.89	12.43	12.51	12.47
J&J Snack Foods	0.95	0.72	0.83	9.84	2.89	11.05	11.47	11.26
Henry (Jack) & Assoc	0.85	0.78	0.82	9.84	2.89	10.96	11.40	11.18
McCormick & Co	0.80	0.59	0.70	9.84	2.89	9.78	10.51	10.14
Monster Beverage	0.85	1.00	0.92	9.84	2.89	11.94	12.14	12.04
Motorola Solutions	0.90	1.01	0.95	9.84	2.89	12.24	12.36	12.30
Mettler-Toledo Int'l	0.95	1.10	1.03	9.84	2.89	13.02	12.95	12.99
Northrop Grumman	0.85	0.73	0.79	9.84	2.89	10.66	11.18	10.92
Old Dominion Freight	0.95	1.07	1.01	9.84	2.89	12.83	12.80	12.81
Pfizer, Inc.	0.80	0.59	0.69	9.84	2.89	9.68	10.44	10.06
Packaging Corp.	0.95	0.82	0.89	9.84	2.89	11.64	11.92	11.78
Post Holdings	0.95	0.81	0.88	9.84	2.89	11.55	11.84	11.69
RLI Corp	0.80	1.02	0.91	9.84	2.89	11.84	12.06	11.95
Service Corp. Int'l	0.95	1.03	0.99	9.84	2.89	12.63	12.65	12.64
Sherwin-Williams	0.90	0.98	0.94	9.84	2.89	12.14	12.28	12.21
Selective Ins. Group	0.90	1.00	0.95	9.84	2.89	12.24	12.36	12.30
Sirius XM Holdings	0.95	1.01	0.98	9.84	2.89	12.53	12.58	12.55
Sensient Techn	0.90	0.99	0.95	9.84	2.89	12.24	12.36	12.30
Thermo Fisher Sci	0.85	0.76	0.80	9.84	2.89	10.76	11.25	11.01
Texas Instruments	0.85	0.92	0.89	9.84	2.89	11.64	11.92	11.78
AMERCO	0.95	1.13	1.04	9.84	2.89	13.12	13.02	13.07
UniFirst Corp	0.95	1.10	1.02	9.84	2.89	12.92	12.87	12.90
VeriSign Inc.	0.90	0.78	0.84	9.84	2.89	11.15	11.55	11.35
Waters Corp.	0.95	0.94	0.94	9.84	2.89	12.14	12.28	12.21
Watsco, Inc.	0.85	0.78	0.82	9.84	2.89	10.96	11.40	11.18
Mean			0.91			11.85 %	12.07 %	11.96 %
Median			0.94			12.09 %	12.25 %	12.17 %
Average of Mean and Median			0.93			11.97 %	12.16 %	12.07 %

## Notes

(1) From note 1 of page 2 of Exhibit DWD-5.

(2) From note 2 of page 2 of Exhibit DWD-5

(3) Average of CAPM and ECAPM cost rates.



### Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAO

		[1]	[2]	[3]	[4]
Line No.		Market Capitalization on March 18, 2022 (1)	Applicable Decile of the NYSE/AMEX/ NASDAQ (2)	Applicable Size Premium (3)	Spread from Applicable Size Premium (4)
		( millions )	(times larger)		
1.	<u>Oncor Electric Delivery Company LLC</u>	\$ 17,044.578	2	0.49%	
2.	<u>Proxy Group of Fourteen Electric Companies</u>	\$ 27,854.041	1.6 x	0.49%	0.00%
		[A]	[B]	[C]	[D]

		Market Capitalization of Smallest Company ( millions )	Market Capitalization of Largest Company ( millions )	Size Premium (Return in Excess of CAPM)*
	Decile			
Largest	1	\$ 29,025.803	\$ 1,966,078.882	-0.22%
	2	13,178.743	28,808.073	0.49%
	3	6,743.361	13,177.828	0.71%
	4	3,861.858	6,710.676	0.75%
	5	2,445.693	3,836.536	1.09%
	6	1,591.865	2,444.745	1.37%
	7	911.586	1,591.765	1.54%
	8	451.955	911.103	1.46%
	9	190.019	451.800	2.29%
Smallest	10	2.194	189.831	5.01%

\*From 2021 Duff & Phelps Cost of Capital Navigator

Notes:

- (1) From page 2 of this Exhibit
- (2) Gleaned from Columns [B] and [C] on the bottom of this page. The appropriate decile (Column [A]) corresponds to the market capitalization of the proxy group, which is found in Column [1].
- (3) Corresponding risk premium to the decile is provided in Column [D] on the bottom of this page.
- (4) Line No. 1 Column [3] - Line No. 2 Column [3]. For example, the 0.00% in Column [4], Line No. 2 is derived as follows  $0.00\% = 0.49\% - 0.49\%$ .

Oncor Electric Delivery Company LLC  
Market Capitalization of Oncor Electric Delivery Company LLC and the  
Proxy Group of Fourteen Electric Companies

Company	Exchange	(1) Common Stock Shares Outstanding at Fiscal Year End 2021 ( millions )	(2) Book Value per Share at Fiscal Year End 2021 (1)	(3) Total Common Equity at Fiscal Year End 2021 ( millions )	(4) Closing Stock Market Price on March 18, 2022	(5) Market-to- Book Ratio on March 18, 2022 (2)	(6) Market Capitalization on March 18, 2022 (3) ( millions )
Oncor Electric Delivery Company LLC		NA	NA	8,467.25 (4)	NA		
Based upon Proxy Group of Fourteen Electric Companies						201.3 (5)	\$ 17,044.578 (6)
Proxy Group of Fourteen Electric Companies							
Alliant Energy Corporation	NASDAQ	250.475	\$ 23.915	\$ 5,990.000	\$ 60.310	252.2 %	\$ 15,106.119
Ameren Corporation	NYSE	257 700	37.641	9,700,000	87.850	233.4	22,638.945
American Electric Power Company, Inc.	NASDAQ	504.212	44.492	22,433.200	94.070	211.4	47,431.224
Duke Energy Corporation	NYSE	769.000	61.553	47,334.000	105.050	170.7	80,783.450
Edison International	NYSE	380.378	36.572	13,911.000	64.650	176.8	24,591.447
Entergy Corporation	NYSE	202.653	57.425	11,637.284	109.450	190.6	22,180.391
Evergy, Inc.	NYSE	229.300	40.316	9,244.400	64.770	160.7	14,851.755
Eversource Energy	NYSE	344.403	42.392	14,599.844	83.430	196.8	28,733.559
IDACORP, Inc.	NYSE	50.516	52.823	2,668.436	110.250	208.7	5,569.442
NorthWestern Corporation	NASDAQ	57 606	40.616	2,339.713	57.340	141.2	3,303.142
OGE Energy Corporation	NYSE	200 500	20.231	4,056.300	38.410	189.9	7,701.205
Portland General Electric Company	NYSE	89.411	30.276	2,707.000	53.790	177.7	4,809.397
The Southern Company	NYSE	1,100.000	25.340	27,874.000	68.030	268.5	74,833.000
Xcel Energy Inc.	NASDAQ	544.025	28.697	15,612.000	68.790	239.7	37,423.498
Average		355.727	\$ 38.735	\$ 13,579.084	\$ 76.156	201.3 %	\$ 27,854.041

NA= Not Available

Notes (1) Column 3 / Column 1.

(2) Column 4 / Column 2

(3) Column 1 \* Column 4.

(4) Requested rate base multiplied by equity ratio.

(5) The market-to-book ratio of Oncor Electric Delivery Company LLC on March 18, 2022 is assumed to be equal to the market-to-book ratio of Proxy Group of Fourteen Electric Companies on March 18, 2022 as appropriate

(6) Column [3] multiplied by Column [5].

Source of Information. 2021 Annual Forms 10K  
yahoo.finance.com  
Bloomberg Professional

Oncor Electric Delivery Company LLC  
Analysis of Moody's Long-Term Issuer Rating and Senior Secured Rating of the Utility Proxy Group

<u>Company</u>	<u>Ticker</u>	<u>Moody's Long-Term Issuer Rating</u>	<u>Moody's Senior Secured Rating</u>	<u>Numerical Weighting (1)</u>		<u>Difference</u>
Interstate Power and Light Company	LNT	Baa1	NA	8.00	NR	
Wisconsin Power and Light Company	LNT	A3	NA	7.00	NR	
Ameren Illinois Company	ACE	A3	A1	7.00	5.00	2
Illinois Power Company	AEE	NA	NA	NR	NR	
Union Electric Company	AEE	Baa1	A2	8.00	6.00	2
Central Illinois Light Company	AEE	NA	A1	NR	5.00	
AEP Texas Central	ACP	Baa2	NA	9.00	NR	
AEP Texas Inc.	AEP	Baa2	NA	9.00	NR	
AEP Texas North	AEP	WR	WR	NR	NR	
Appalachian Power Company	AEP	Baa1	NA	8.00	NR	
Columbus Southern Power Company	AEP	A3	NA	7.00	NR	
Indiana Michigan Power Company	AEP	A3	NA	7.00	NR	
Kentucky Power Company	AEP	Baa3	NA	10.00	NR	
Ohio Power Company	AEP	A3	NA	7.00	NR	
Public Service Company of Oklahoma	AEP	Baa1	NA	8.00	NR	
Southwestern Electric Power Company	AEP	Baa2	NA	9.00	NR	
Wheeling Power Company	AEP	NA	NA	NR	NR	
Duke Energy Carolinas, LLC	DUK	A2	Aa3	6.00	4.00	2
Duke Energy Florida, LLC	DUK	A3	A1	7.00	5.00	2
Duke Energy Indiana, LLC	DUK	A2	Aa3	6.00	4.00	2
Duke Energy Kentucky, Inc.	DUK	Baa1	NA	8.00	NR	
Duke Energy Ohio, Inc.	DUK	Baa1	A2	8.00	6.00	2
Duke Energy Progress, LLC	DUK	A2	Aa3	6.00	4.00	2
Florida Progress Corporation	DUK	NA	NA	NR	NR	
Piedmont Natural Gas Company, Inc.	DUK	A3	NA	7.00	NR	
Progress Energy, Inc.	DUK	Baa1	NA	8.00	NR	
Southern California Edison Company	EIX	Baa2	A3	9.00	7.00	2
Entergy Arkansas, LLC	ETR	Baa1	A2	8.00	6.00	2
Entergy Gulf States Louisiana, LLC	ETR		A2	NR	6.00	
Entergy Louisiana, LLC	ETR	Baa1	A2	8.00	6.00	2
Entergy Mississippi, LLC	ETR	Baa1	A2	8.00	6.00	2
Entergy New Orleans, LLC	ETR	Ba1	Baa2	11.00	9.00	2
Entergy Texas, Inc.	ETR	Baa2	A3	9.00	7.00	2
Evergy Kansas Central, Inc.	EVRG	Baa1	A2	8.00	6.00	2
Evergy Kansas South, Inc.	EVRG	Baa1	A2	8.00	6.00	2
Evergy Metro, Inc.	EVRG	Baa1	A2	8.00	6.00	2
Evergy Missouri West, Inc.	EVRG	Baa2	A3	9.00	7.00	2
Aquarion Water Company of Connecticut, Inc.	ES	A3	NA	7.00	NR	
Aquarion Company	ES	Baa2	NA	9.00	NR	
The Connecticut Light and Power Company	ES	A3	A1	7.00	5.00	2
Eversource Gas Company of Massachusetts	ES	Baa2	NA	9.00	NR	
Eversource Gas Company of MA	ES	NA	NA	NR	NR	
NSTAR Electric Company	ES	A1	NA	5.00	NR	
NSTAR Gas Company	ES	NA	NA	NR	NR	
Public Service Company of New Hampshire	ES	A3	A1	7.00	5.00	2
Yankee Gas Services Company	ES	Baa1	A2	8.00	6.00	2
Idaho Power Company	IDA	A3	A1	7.00	5.00	2
NorthWestern Corporation	NWE	Baa2	A3	9.00	7.00	2
Oklahoma Gas and Electric Company	OGE	A3	WR	7.00	NR	
Portland General Electric Company	POR	A3	A1	7.00	5.00	2
Alabama Power Company	SO	A1	WR	5.00	NR	
Atlanta Gas Light Company	SO	WR	WR	NR	NR	
Georgia Power Company	SO	Baa1	WR	8.00	NR	
Mississippi Power Company	SO	Baa1	WR	8.00	NR	
Southern Company Gas	SO	WR	WR	NR	NR	
Southern Company Services, Inc.	SO	WR	NA	NR	NR	
Northern States Power Company - MN	XEL	A2	Aa3	6.00	4.00	2
Northern States Power Company - WI	XEL	A2	Aa3	6.00	4.00	2
Public Service Company of Colorado	XEL	A3	A1	7.00	5.00	2
Southwestern Public Service Company	XEL	Baa2	A3	9.00	7.00	2

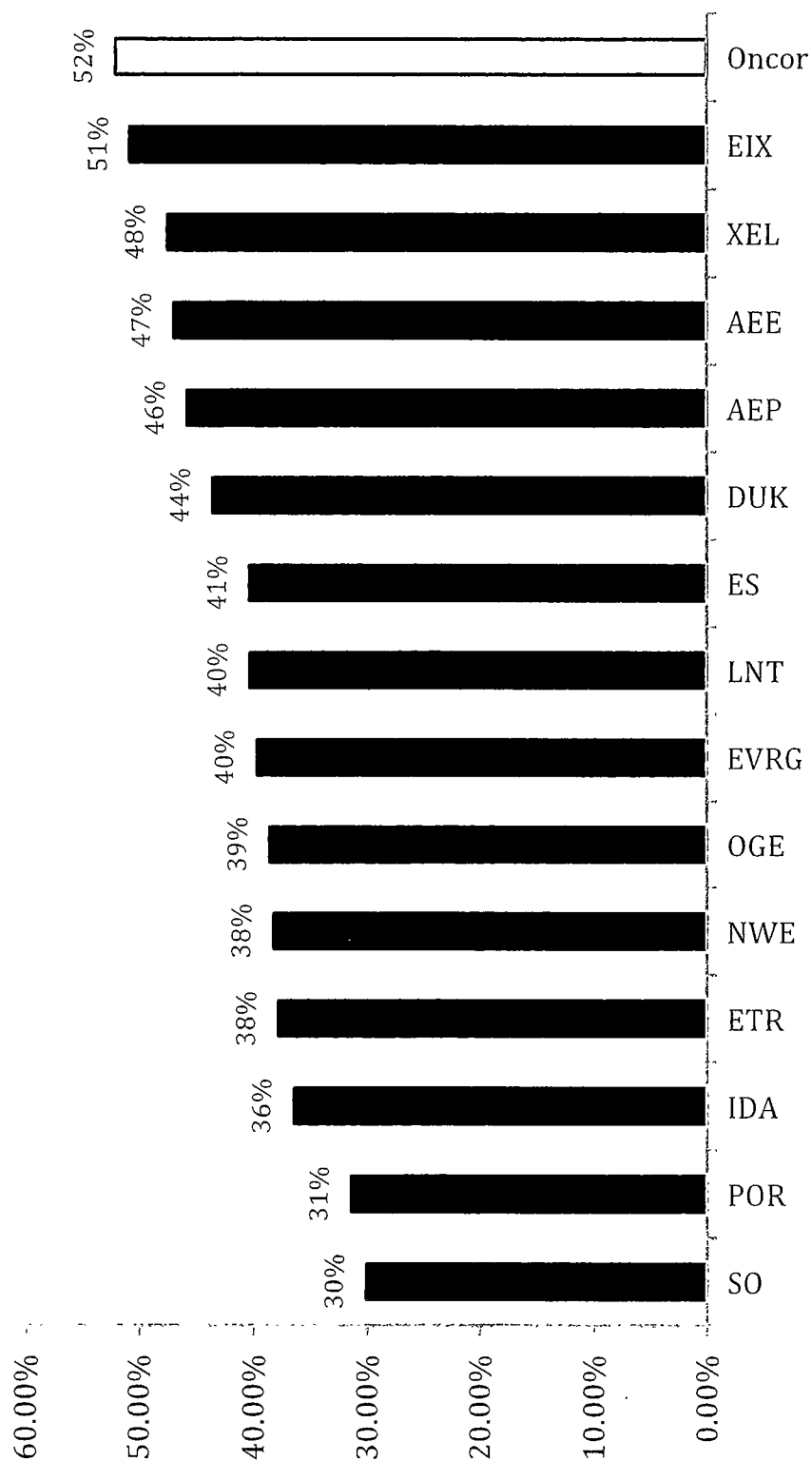
Notes:

(1) Page 6 of Exhibit DWD-4.

Source:

S&P Capital IQ

Oncor Electric Delivery Company LLC  
Comparison of Projected Capital Expenditures Relative to Net Plant



Sources of Information: Value Line Investment Survey  
Oncor 2021 SEC Form 10-K

**2022 RATE CASE  
ONCOR ELECTRIC DELIVERY COMPANY LLC  
VOLUMINOUS WORKPAPERS FOR  
THE DIRECT TESTIMONY OF  
DYLAN W. D'ASCENDIS**

The information is voluminous and is being provided in electronic format in compliance with RFP General Instruction No. 15. Additionally, in accordance with RFP General Instruction No. 12(c), below is a list of the files that are being provided electronically:

Testimony Workpapers/Voluminous/D'Ascendis

D'Ascendis Exhibits Voluminous WPs.xlsm  
D'Ascendis Vol WPs 19-24.pdf  
D'Ascendis-Direct-WPs-Cover.doc

**INDEX TO THE DIRECT TESTIMONY  
OF ALAN S. TAPER, WITNESS FOR  
ONCOR ELECTRIC DELIVERY COMPANY LLC**

I.	POSITION AND QUALIFICATIONS .....	3
II.	PURPOSE OF TESTIMONY.....	4
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IV.	OVERVIEW OF ACCOUNTING AND REGULATORY RULES FOR POSTRETIREMENT BENEFITS.....	11
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VI.	CONCLUSION.....	28
	AFFIDAVIT .....	30
	EXHIBITS	

**CONFIDENTIAL EXHIBITS FILED UNDER SEAL**

Exhibit AST-1	Actuarial Valuation Report for 2022 Rate Case Oncor Retirement Plan: 2022 Fiscal Year (Confidential)
Exhibit AST-2	Actuarial Valuation Report for 2022 Rate Case Vistra Retirement Plan: 2022 Fiscal Year (Confidential)
Exhibit AST-3	Actuarial Valuation Report for 2022 Rate Case Oncor Supplemental Retirement Plan: 2022 Fiscal Year (Confidential)
Exhibit AST-4	Actuarial Valuation Report for 2022 Rate Case Oncor Retiree Welfare Plan: 2022 Fiscal Year (Confidential)
Exhibit AST-5	Actuarial Valuation Report for 2022 Rate Case Shared Retiree Welfare Plan: 2022 Fiscal Year (Confidential)
Exhibit AST-6	Actuarial Valuation Report for 2022 Rate Case Oncor Retirement Plan: 2021 Fiscal Year (Confidential)
Exhibit AST-7	Actuarial Valuation Report for 2022 Rate Case Vistra Energy Retirement Plan: 2021 Fiscal Year (Confidential)

PUC Docket No. \_\_\_\_\_

**Taper – Direct  
Oncor Electric Delivery  
2022 Rate Case**

- Exhibit AST-8     Actuarial Valuation Report for 2022 Rate Case  
                         Oncor Supplemental Retirement Plan: 2021 Fiscal Year  
                         (Confidential)
- Exhibit AST-9     Actuarial Valuation Report for 2022 Rate Case  
                         Oncor Retiree Welfare Plan: 2021 Fiscal Year  
                         (Confidential)
- Exhibit AST-10    Actuarial Valuation Report for 2022 Rate Case  
                         Shared Retiree Welfare Plan: 2021 Fiscal Year  
                         (Confidential)

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PUC Docket No. \_\_\_\_\_

**Taper – Direct  
Oncor Electric Delivery  
2022 Rate Case**



**DIRECT TESTIMONY OF ALAN S. TAPER**

**I. POSITION AND QUALIFICATIONS**

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Alan S. Taper. My business address is 5005 LBJ Freeway,  
3 Suite 1400, Dallas, Texas 75244.

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

5 A. I am a consulting actuary and Senior Partner with Aon plc. ("Aon"). I have  
6 more than 30 years of experience in providing consulting services to  
7 clients on employee benefit matters.

8 Q. PLEASE DESCRIBE AON.

9 A. Aon is a leading global professional services firm providing a broad range  
10 of risk, retirement, and health solutions. With offices in almost 120  
11 countries, Aon employs approximately 50,000 people.

12 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.

13 A. I earned a Bachelor of Business Administration degree with high honors  
14 with a concentration in Actuarial Science from the University of Texas at  
15 Austin.

16 Q. ARE YOU A CREDENTIALLED ACTUARY?

17 A. Yes, I am a Fellow of the Society of Actuaries, a Member of the American  
18 Academy of Actuaries, a Fellow of the Conference of Consulting  
19 Actuaries, and an Enrolled Actuary under the Employee Retirement  
20 Income Security Act of 1974 ("ERISA").

21 Q. WHAT DOES IT TAKE TO BECOME A FELLOW OF THE SOCIETY OF  
22 ACTUARIES AND AN ENROLLED ACTUARY?

23 A. An actuary must pass a series of exams administered by the Society of  
24 Actuaries to become a Fellow. In addition, the Joint Board for Enrollment  
25 of Actuaries administers a separate series of exams to become an  
26 Enrolled Actuary. When I took them, the actuarial exams were offered  
27 once or twice a year. A candidate normally takes one exam at each  
28 session so it typically takes many years to pass all of the exams. There  
29  
30

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**Taper – Direct  
Oncor Electric Delivery  
2022 Rate Case**

1 are also continuing education requirements for an actuary to maintain  
2 accreditation.

3 Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

4 A. I have been retained to provide expert testimony on behalf of Oncor  
5 Electric Delivery Company LLC ("Oncor" or the "Company") on the subject  
6 of pension benefits and other postretirement benefits. Oncor is a client of  
7 Aon to which I provide actuarial and consulting services with respect to  
8 pension and other postretirement benefits.

9 Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY ON BEHALF OF  
10 ONCOR TO THE PUBLIC UTILITY COMMISSION OF TEXAS  
11 ("COMMISSION")?

12 A. Yes. I provided direct testimony on the subject of pension benefits and  
13 other postretirement benefits on behalf of Oncor in Commission Docket  
14 Nos. 38929 and 46957.

15 **II. PURPOSE OF TESTIMONY**

16 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS  
17 PROCEEDING?

18 A. The purpose of my direct testimony is to provide an overview of pension  
19 and postretirement benefit accounting and to discuss how these costs  
20 have been determined for rate making purposes. I will also testify to the  
21 reasonableness and necessity of the test year costs, as adjusted for  
22 known and measurable changes, for the pension and other postretirement  
23 benefit plans for which Oncor is seeking recovery in this proceeding.

24 My testimony, the attached exhibits, and all associated workpapers  
25 were prepared by me or under my direction, supervision, or control, and  
26 are true and correct.

27 **III. OVERVIEW OF ACCOUNTING AND REGULATORY RULES FOR**  
28 **PENSIONS**

29 Q. WHAT ARE DEFINED BENEFIT PENSIONS?

30 A. Accounting Standards Codification 715-30 – Compensation Defined

PUC Docket No. \_\_\_\_\_

Taper – Direct  
Oncor Electric Delivery  
2022 Rate Case

1 Benefit Plans – Pensions (“ASC 715-30”), originally issued as Statement  
2 of Financial Accounting Standards No. 87 (“FAS 87”), contains the  
3 following definition of a defined benefit pension plan:

4 A pension plan that defines an amount of pension benefit to be  
5 provided, usually as a function of one or more factors such as  
6 age, years of service, or compensation. Any pension plan that  
7 is not a defined contribution pension plan is, for purposes of  
8 Subtopic 715-30, a defined benefit pension plan.

9 Q. IN WHICH DEFINED BENEFIT PENSION PLANS DOES ONCOR  
10 CURRENTLY PARTICIPATE?

11 A. Oncor currently participates in three defined benefit pension plans – the  
12 Oncor Retirement Plan, the Oncor Supplemental Retirement Plan, and the  
13 Vistra Retirement Plan. Oncor is the ERISA plan sponsor, as that term is  
14 defined in federal law, of the Oncor Retirement Plan and the Oncor  
15 Supplemental Retirement Plan. Oncor is also responsible for certain  
16 obligations related to the Vistra Retirement Plan, of which Vistra Corp.  
17 (“Vistra”) is the ERISA plan sponsor.

18 Q. WHY DOES ONCOR HAVE RESPONSIBILITY FOR OBLIGATIONS  
19 RELATED TO THE VISTRA RETIREMENT PLAN?

20 A. As described later in my testimony, Vistra owns former affiliates of Oncor,  
21 and certain participants of the Vistra Retirement Plan had service with the  
22 predecessor integrated electric utility company before its unbundling under  
23 Public Utility Regulatory Act (“PURA”) Chapter 39 (“unbundling”). Pension  
24 benefits for these plan participants attributable to their regulated service  
25 are Oncor’s responsibility.

26 Q. HOW DO THE PENSION PLANS DETERMINE BENEFITS FOR  
27 PARTICIPANTS?

28 A. A participant in the Oncor Retirement Plan or Vistra Retirement Plan will  
29 receive benefits under one of two components – a final average pay  
30 (“FAP”) component or a cash balance component. The FAP benefit  
31 defines an individual’s pension as a percentage of the highest three-year

1 average pay at retirement for each year of service. The cash balance  
2 component provides a hypothetical account for each participant, much like  
3 a savings plan. Each year additional credits based on pay and service are  
4 added to the account for active employees. In addition, interest credits  
5 are added to the account using a rate defined in the plan for all cash  
6 balance participants. Generally, new hires and rehires since December  
7 31, 2000, and prior hires who made a one-time election as of that date,  
8 will receive the Cash Balance benefit; all other employees will receive the  
9 FAP benefit.

10 Q. WHAT IS THE DIFFERENCE BETWEEN A QUALIFIED AND NON-  
11 QUALIFIED PENSION PLAN?

12 A. A qualified pension plan meets all the requirements of Section 401(a) of  
13 the Internal Revenue Code of 1986, as amended (the "Code"), and is  
14 subject to the provisions of ERISA. By meeting all of the Code  
15 requirements, a qualified pension plan is granted certain favorable tax  
16 treatment. Pension plans that are exclusively for company executives or  
17 higher paid individuals are not qualified under the Code and are therefore  
18 limited as to the preferred tax treatment. Non-qualified pension plans  
19 generally make up for benefits that higher paid employees would lose due  
20 to benefit limits placed on qualified plans under the Code. Both qualified  
21 and non-qualified plans must be accounted for under ASC 715-30. The  
22 Oncor Retirement Plan and the Vistra Retirement Plan are qualified plans.  
23 The Oncor Supplemental Retirement Plan is a non-qualified plan. The  
24 qualified plans account for about 97% of Oncor's total projected benefit  
25 obligation.

26 Q. WHAT ARE PENSION BENEFIT OBLIGATIONS?

27 A. A pension benefit obligation measures the liability for which the ERISA  
28 plan sponsor is responsible as a result of future pension benefits that the  
29 plan is expected to pay.

30 Q. UNDER WHAT AUTHORITY ARE PENSION BENEFIT OBLIGATIONS

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1 DETERMINED?

2 A. Pension benefit obligations are defined under generally accepted  
3 accounting principles ("GAAP"). In the United States, the Securities and  
4 Exchange Commission ("SEC") has authorized the Financial Accounting  
5 Standards Board ("FASB") to establish and publish accounting standards.  
6 FAS 87 originally established such accounting guidance for pension plans  
7 in coordination with the American Academy of Actuaries. The provisions  
8 of FAS 87 are now set forth in ASC 715.

9 Q. WHAT DIFFERENT MEASURES OF PENSION BENEFIT OBLIGATIONS  
10 WILL BE REFERRED TO IN THIS TESTIMONY?

11 A. There are two types of pension benefit obligations that will be discussed:

- 12 • Projected benefit obligation ("PBO") is the actuarial present value of  
13 benefits, based on current service, that are expected to be paid to  
14 an individual from the plan. This measure includes projected future  
15 pay growth, but only reflects benefit service that has been earned  
16 as of the valuation date.
- 17 • Service cost is the actuarial present value of benefits earned during  
18 the current measurement period on a PBO basis.

19 Q. WHAT INFORMATION IS NEEDED FOR THESE CALCULATIONS?

20 A. There are three elements of information required to determine the pension  
21 benefit obligations:

- 22 • Census Data: Census data containing applicable demographic  
23 information for each current and former employee who, as of the  
24 data snapshot date, is a participant in the pension plan. For current  
25 employees, this information includes each individual's age, gender,  
26 service period, pay information, subsidiary identification code, and  
27 cash balance account value (if applicable). For former employees  
28 who are owed a future benefit or are currently receiving benefits,  
29 this information includes the age, gender, subsidiary identification  
30 code, amount of benefit and form of benefit payment (if currently

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- 1 receiving benefits), cash balance account value (if applicable), and  
 2 beneficiary information (if applicable).
- 3 • Plan Provisions: The legal plan documents contain the provisions  
 4 of the plans. These provisions are the basis upon which the benefit  
 5 obligations are determined.
  - 6 • Assumptions: Oncor and Vistra, based on the recommendations of  
 7 their actuaries and investment consultants, make certain  
 8 assumptions to model the impact of future events for their  
 9 respective plans. ASC 715-30 requires that “each significant  
 10 assumption used shall reflect the best estimate solely with respect  
 11 to that individual assumption.” These assumptions are reviewed by  
 12 Oncor’s and Vistra’s independent auditors, respectively, for  
 13 reasonableness.

14 Q. WHAT ARE THE KEY ASSUMPTIONS USED?

15 A. The following are key assumptions used to determine pension benefit  
 16 obligations and pension cost:

- 17 • Retirement Age: An assumption of when a participant will retire is  
 18 necessary to estimate the timing of payments to each individual.
- 19 • Turnover: Because participants may terminate employment prior to  
 20 retirement (either vested or non-vested), an assumption for  
 21 terminations prior to retirement is necessary.
- 22 • Life Expectancy: Because pension benefits are often payable  
 23 during a retiree’s and beneficiary’s lifetime, a mortality table  
 24 assumption is used to model life expectancy for each eligible retiree  
 25 (and beneficiary, if applicable).
- 26 • Discount Rate: Because pension benefits are paid in the future,  
 27 ASC 715-30 requires the discounting of projected cash flows in  
 28 recognition of the time value of money. The applicable discount  
 29 rate should reflect settlement rates, which may be approximated by  
 30 the rate of return on high-quality, fixed-income investments

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- 1 currently available whose cash flows match the timing of the  
2 amount of the expected future benefit payments.
- 3 • Expected Return on Plan Assets: Because the annual pension cost  
4 is offset by the anticipated return on plan assets, ASC 715-30 calls  
5 for an assumed rate of return on plan assets for future years. This  
6 rate should be reasonable based on the actual and targeted  
7 investment mix for the pension plan assets.
  - 8 • Pay Increase Rate: The PBO and service cost reflect a projection  
9 of pay increases into the future. The assumed pay increase rates  
10 are determined by Oncor and Vistra, respectively, with input from  
11 their actuaries, and are intended to reflect reasonable future  
12 expectations.
  - 13 • Cash Balance Interest Crediting Rate: The cash balance interest  
14 crediting rate is updated annually based on the yield on 30-year  
15 Treasury securities. Because the interest crediting rates for future  
16 years are unknown, a reasonable estimate of future rates is  
17 required based on the current rate and expectations of the future.
  - 18 • Form of Benefit Payment: An assumption about the form of  
19 payment that each plan participant will elect upon retirement is  
20 required. For example, cash balance participants can elect a lump  
21 sum distribution of their benefits in lieu of a lifetime annuity.
- 22 Q. WHAT ARE THE COMPONENTS OF NET PERIODIC PENSION COST  
23 UNDER GAAP, AND HOW ARE THEY CALCULATED?
- 24 A. ASC 715-30 lists the six components of net periodic pension cost as  
25 follows:
- 26 • Service Cost: The service cost is the actuarial present value of  
27 benefits earned during the current measurement period on a PBO  
28 basis. The assumptions and methodology are similar to the  
29 determination of the PBO, except that the service cost is the  
30 accrual for the measurement period rather than the accumulation of

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- 1 prior accruals.
- 2 • Interest Cost: The interest cost is the increase in the PBO due to
- 3 the shortening of the discount period resulting from the passage of
- 4 time and reflecting the current discount rate.
- 5 • Expected Return on Plan Assets: The expected return on plan
- 6 assets represents the expected investment return, net of
- 7 administrative and investment expenses, adjusted to smooth asset
- 8 fluctuations under ASC 715-30.
- 9 • Amortization of Unrecognized Prior Service Cost or Credit: ASC
- 10 715-30 allows for the amortization of any change in PBO resulting
- 11 from plan changes that impact benefits earned in prior periods. A
- 12 change that increases the PBO is called a prior service cost.
- 13 Conversely, a change that decreases the PBO is called a prior
- 14 service credit. In either case, the amortization period is generally
- 15 the expected remaining working period for active employees
- 16 expected to receive benefits.
- 17 • Amortization of Unrecognized Gains or Losses: Gains and losses
- 18 are defined as changes in the PBO and plan assets due to plan
- 19 experience that differs from assumptions, as well as any changes
- 20 to plan assumptions. ASC 715-30 does not require immediate
- 21 recognition of these changes. Rather, gains or losses may be
- 22 deferred and recognized in pension cost to the extent that the total
- 23 amount exceeds a "corridor" specified in ASC 715-30. Amounts
- 24 outside of this corridor, which is equal to 10% of the greater of the
- 25 PBO and the applicable plan asset value, are generally recognized
- 26 over the expected remaining working period for active employees
- 27 expected to receive benefits.
- 28 • Amortization of Unrecognized Transition Obligation or Asset: The
- 29 difference between the PBO and plan assets compared with the
- 30 amount recognized on a company's balance sheet when FAS 87

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1 was first adopted was established as the unrecognized transition  
2 obligation or asset. That amount was then generally amortized  
3 over the average remaining working period of the active employees  
4 expected to receive benefits at that time. There is no more  
5 unrecognized transition obligation or asset remaining for any of the  
6 pension plans in which Oncor participates.

7 Q. HOW IS THE PENSION COST RELEVANT UNDER PURA § 36.065?

8 A. PURA § 36.065 states that a regulated utility shall include in the rate  
9 determination appropriate pension benefit costs under GAAP. Further, for  
10 those employees who were employed by the predecessor integrated  
11 electric utility before its unbundling, benefits attributable to service prior to  
12 unbundling shall be included in the regulated benefit costs, irrespective of  
13 the business activity performed by such employees after the date of  
14 unbundling.

15 Q. WHICH COMPANIES OR ENTITIES ARE TREATED AS HAVING BEEN  
16 PART OF THE PREDECESSOR INTEGRATED ELECTRIC UTILITY  
17 BEFORE ITS UNBUNDLING?

18 A. Oncor, the power generator Luminant (previously known as TXU Power  
19 and TXU Wholesale), and retail electric provider TXU Energy were part of  
20 the predecessor integrated utility prior to unbundling. Vistra now owns  
21 Luminant and TXU Energy, but Oncor is not affiliated with Vistra,  
22 Luminant, or TXU Energy. In addition, employees of a former Oncor  
23 affiliate, EFH Corporate Services (previously known as TXU Business  
24 Services), provided service to the predecessor integrated electric utility  
25 prior to unbundling.

26 **IV. OVERVIEW OF ACCOUNTING AND REGULATORY RULES FOR**  
27 **POSTRETIREMENT BENEFITS**

28 Q. WHAT ARE "OPEBs"?

29 A. The acronym "OPEB" refers to other post-employment benefits. These  
30 benefits are also commonly referred to as postretirement benefits other

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1 than pensions. For Oncor's employees, OPEBs include health care  
2 coverage – medical, prescription drugs, and dental – as well as life  
3 insurance coverage provided to retirees and their eligible dependents.

4 Q. IN WHICH POSTRETIREMENT BENEFIT PLANS DOES ONCOR  
5 CURRENTLY PARTICIPATE?

6 A. Oncor currently participates in two postretirement benefit plans – the  
7 Oncor Retiree Welfare Plan and the Shared Retiree Welfare Plan. Oncor  
8 is the ERISA plan sponsor of both plans. The Oncor Retiree Welfare Plan  
9 covers eligible current and future retirees whose employment services  
10 were assigned only to Oncor or its regulated predecessors (including the  
11 predecessor regulated electric utility prior to its unbundling). The Shared  
12 Retiree Welfare Plan, established as of January 1, 2018, covers eligible  
13 current and future retirees who were employed by the predecessor  
14 integrated electric utility prior to its unbundling and whose employment  
15 services were assigned to both Oncor or its regulated predecessors  
16 (including the predecessor regulated electric utility company prior to  
17 unbundling) *and* the non-regulated affiliate businesses. Participants in the  
18 Shared Retiree Welfare Plan are known as "Shared Retirees."

19 Q. WHY DID ONCOR ESTABLISH THE SHARED RETIREE WELFARE  
20 PLAN?

21 A. Until December 31, 2017, all eligible current and future retirees were  
22 covered by the Oncor Retiree Welfare Plan. Because the non-regulated  
23 businesses were spun off to a separate company now known as Vistra  
24 (which is no longer affiliated with Oncor), Shared Retirees could no longer  
25 participate in the current Oncor Retiree Welfare Plan. Therefore, Oncor  
26 established the Shared Retiree Welfare Plan. Postretirement benefit  
27 coverage for Shared Retirees was transferred to the Shared Retiree  
28 Welfare Plan as of January 1, 2018. The Shared Retiree Welfare Plan is  
29 further described in the direct testimony of Company witnesses Ms.  
30 Angela Guillory and Mr. Kevin Fease.

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1 Q. DID THE TRANSFER OF POSTRETIREMENT BENEFIT COVERAGE  
2 FOR SHARED RETIREES FROM THE ONCOR RETIREE WELFARE  
3 PLAN TO THE SHARED RETIREE WELFARE PLAN HAVE ANY  
4 IMPACT ON BENEFITS FOR PLAN PARTICIPANTS?

5 A. The Oncor Retiree Welfare Plan is self-funded for health care coverage,  
6 which is a common practice for larger employers like Oncor. However, the  
7 Shared Retiree Welfare Plan is fully insured in order to comply with  
8 Department of Labor and state insurance requirements related to multiple-  
9 employer welfare arrangements covering unrelated businesses like Oncor  
10 and Vistra. While the fully insured coverage of the Shared Retiree  
11 Welfare Plan is very similar to the Oncor Retiree Welfare Plan coverage,  
12 Oncor was unable to exactly replicate the coverage. As a result, Oncor's  
13 OPEB benefit obligation for Shared Retirees was reduced at the time of  
14 the transfer.

15 Q. IS ONCOR RESPONSIBLE FOR THE ENTIRE SHARED RETIREE  
16 WELFARE PLAN?

17 A. No. Oncor is only responsible for Shared Retiree Welfare Plan benefit  
18 obligations based on a Shared Retiree's percentage of career service  
19 attributable to regulated utility service. Vistra is responsible for Shared  
20 Retiree Welfare Plan benefit obligations based on a Shared Retiree's  
21 percentage of career service attributable to non-regulated service.

22 Q. HOW DO THE POSTRETIREMENT BENEFIT PLANS DETERMINE  
23 BENEFITS FOR PARTICIPANTS?

24 A. The Oncor Retiree Welfare Plan and Shared Retiree Welfare Plan each  
25 have two components – health care benefits and life insurance benefits.  
26 The health care portion provides retirees with access to medical,  
27 prescription drug, and dental coverage. The portion of the medical and  
28 prescription drug cost paid by retirees is dependent on when they were  
29 hired, when they retired, and their age and years of service at retirement.  
30 The cost of dental coverage is fully paid by retirees. The life insurance

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1 benefits depend on the plan under which the retiree is covered and are  
2 either a specified dollar amount or are based on salary with a cost sharing  
3 arrangement.

4 Q. WHAT ARE POSTRETIREMENT BENEFIT OBLIGATIONS?

5 A. A postretirement benefit obligation measures the liability for which the  
6 ERISA plan sponsor is responsible as a result of future postretirement  
7 benefits other than pensions that the plan is expected to pay.

8 Q. UNDER WHAT AUTHORITY ARE POSTRETIREMENT BENEFIT  
9 OBLIGATIONS DETERMINED?

10 A. Postretirement benefit obligations are defined under GAAP. In the United  
11 States, the SEC has authorized the FASB to establish and publish  
12 accounting standards. Accounting Standards Codification ASC 715-60 –  
13 Other Postretirement Benefit Plans (“ASC 715-60”), originally issued as  
14 Statement of Financial Accounting Standards No. 106 (“FAS 106”),  
15 establishes such accounting guidance for other postretirement benefit  
16 plans in coordination with the American Academy of Actuaries.

17 Q. WHAT DIFFERENT MEASURES OF POSTRETIREMENT BENEFIT  
18 OBLIGATIONS WILL BE REFERRED TO IN THIS TESTIMONY  
19 RELATED TO THE ONCOR RETIREE WELFARE PLAN?

20 A. There are three types of postretirement benefit obligations that will be  
21 discussed:

- 22 • Expected postretirement benefit obligation (“EPBO”) is the actuarial  
23 present value of the company-paid portion of all benefits expected  
24 to be paid to an individual and any covered dependents from the  
25 plan – including projected future costs.
- 26 • Accumulated postretirement benefit obligation (“APBO”) represents  
27 the portion of the EPBO that is attributable to past service. The  
28 APBO is determined by multiplying the EPBO by the ratio of (a)  
29 each person’s service as of the valuation date, over (b) each  
30 person’s service projected to the date he or she is fully eligible for

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1 retiree benefit coverage.

- 2 • Service cost is the actuarial present value of benefits earned during  
3 the current measurement period on an EPBO basis. The service  
4 cost is determined by multiplying the EPBO by the ratio of (a) the  
5 measurement period, over (b) each person's service projected to  
6 the date he or she is fully eligible for retiree benefit coverage.

7 Q. WHAT INFORMATION IS NEEDED TO CALCULATE  
8 POSTRETIREMENT BENEFIT OBLIGATIONS?

9 A. There are three elements of information required to determine the  
10 postretirement benefit obligations:

- 11 • Census Data: Census data containing applicable demographic  
12 information for each current employee and retiree who, as of the  
13 data snapshot date, is a participant in the postretirement benefit  
14 plan. For current employees, this information includes each  
15 individual's age, gender, service period, subsidiary identification  
16 code, and pay information. For retirees, this information includes  
17 the age, gender, subsidiary identification code, health plan tier  
18 (level of coverage), cost sharing level, beneficiary information (if  
19 applicable) and life insurance coverage.
- 20 • Plan Provisions: A plan description and annual enrollment  
21 materials describe the provisions of the plans. These provisions  
22 are the basis upon which the benefit obligations are determined.
- 23 • Assumptions: Oncor and Vistra, based on the recommendations of  
24 their actuaries and investment consultants, make certain  
25 assumptions to model the impact of future events. ASC 715-60  
26 requires the use of "explicit assumptions, each of which individually  
27 represents the best estimate of a particular future event, to  
28 measure the expected postretirement benefit obligation." These  
29 assumptions are reviewed by Oncor's and Vistra's independent  
30 auditors for reasonableness.

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1 Q. WHAT ARE THE KEY ASSUMPTIONS USED?

2 A. The following are key assumptions used to determine postretirement  
3 benefit obligations and postretirement benefit cost:

- 4 • Retirement Age: An assumption of when a participant will retire is  
5 necessary to estimate the value of benefits to each individual.
- 6 • Turnover: Because OPEBs are generally not paid to participants  
7 who terminate employment prior to retirement, an assumption for  
8 terminations prior to retirement is necessary.
- 9 • Life Expectancy: Because benefits are often payable during a  
10 retiree's and dependent's lifetime, a mortality table assumption is  
11 used to model life expectancy for each eligible retiree and  
12 dependent.
- 13 • Participation: Because postretirement benefit coverage is not  
14 mandatory, an assumption to model the percentage of retirees and  
15 dependents that will elect future coverage is necessary.
- 16 • Health Care Cost: An assumption representing the cost of health  
17 care is needed to model the current year cost as well as the rate at  
18 which costs will increase in the future.
- 19 • Discount Rate: Because postretirement benefits are paid in the  
20 future, ASC 715-60 requires the discounting of projected cash flows  
21 in recognition of the time value of money. The applicable discount  
22 rate should reflect settlement rates, which may be approximated by  
23 the rate of return on high-quality fixed-income investments currently  
24 available whose cash flows match the timing of the amount of the  
25 expected future benefit payments.
- 26 • Expected Return on Plan Assets: Because the annual  
27 postretirement benefit cost is offset by the anticipated return on  
28 plan assets, ASC 715-60 calls for an assumed rate of return on  
29 plan assets for future years. This rate should be reasonable based  
30 on the actual and targeted investment mix for the plan assets.

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1 Q. WHAT ARE THE COMPONENTS OF NET PERIODIC  
2 POSTRETIREMENT BENEFIT COST AND HOW ARE THEY  
3 CALCULATED?  
4 A. ASC 715-60 lists the six components of net periodic postretirement benefit  
5 cost as follows:  
6 • Service Cost: The service cost is the actuarial present value of  
7 benefits earned during the current measurement period on an  
8 EPBO basis. The assumptions and methodology are similar to the  
9 determination of the APBO, except that the service cost is the  
10 accrual for the measurement period rather than the accumulation of  
11 prior accruals.  
12 • Interest Cost: The interest cost is the increase in the APBO due to  
13 the shortening of the discount period resulting from the passage of  
14 time and reflecting the current discount rate.  
15 • Expected Return on Plan Assets: The expected return on plan  
16 assets represents the expected investment return, net of  
17 investment expenses, on plan assets under ASC 715-60.  
18 • Amortization of Unrecognized Prior Service Cost or Credit: ASC  
19 715-60 allows for the amortization of any change in APBO resulting  
20 from plan changes that impact benefits earned in prior periods. A  
21 change that increases the APBO is called a prior service cost.  
22 Conversely, a change that decreases the APBO is called a prior  
23 service credit. In either case, the amortization period is generally  
24 the expected remaining working period for active employees until  
25 full eligibility for benefits.  
26 • Amortization of Unrecognized Gains or Losses: Gains and losses  
27 are defined as changes in the APBO and plan assets due to plan  
28 experience that differs from assumptions, as well as any changes  
29 to plan assumptions. ASC 715-60 does not require immediate  
30 recognition of these changes. Rather, gains or losses may be

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1 deferred and recognized in postretirement benefit cost to the extent  
2 that the total amount exceeds a “corridor” specified in ASC 715-60.  
3 Amounts outside of this corridor, which is equal to 10% of the  
4 greater of the APBO and the applicable plan asset value, are  
5 generally recognized over the expected remaining working period  
6 for active employees expected to receive benefits.

- 7 • Amortization of Unrecognized Transition Obligation or Asset: The  
8 difference between the APBO and plan assets compared with the  
9 amount recognized on a company’s balance sheet when FAS 106  
10 was first adopted was established as the unrecognized transition  
11 obligation or asset. That amount was then generally amortized  
12 over the average remaining working period of the active employees  
13 expected to receive benefits at that time (or 20 years, if longer).  
14 There is no more unrecognized transition obligation or asset  
15 remaining for either of the postretirement benefit plans in which  
16 Oncor participates.

17 Q. HOW IS THE POSTRETIREMENT BENEFIT COST RELEVANT UNDER  
18 PURA § 36.065?

19 A. PURA § 36.065 states that a regulated utility shall include in the rate  
20 determination appropriate postretirement benefit costs under GAAP.  
21 Further, for those employees who were employed by the predecessor  
22 integrated electric utility before the utility’s unbundling, benefits attributable  
23 to service prior to unbundling shall be included in the regulated benefit  
24 costs, irrespective of the business activity performed by such employees  
25 after the date of unbundling.

26 Q. WHICH COMPANIES OR ENTITIES ARE TREATED AS HAVING BEEN  
27 PART OF THE PREDECESSOR INTEGRATED ELECTRIC UTILITY  
28 BEFORE THE UNBUNDLING?

29 A. Oncor, Luminant (previously known as TXU Power and TXU Wholesale),  
30 and TXU Energy were part of the predecessor integrated utility prior to

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1 unbundling. In addition, employees of EFH Corporate Services  
2 (previously known as TXU Business Services) provided service to the  
3 predecessor integrated electric utility prior to unbundling.

4 **V. ADJUSTED TEST YEAR COST**

5 Q. DO YOUR ACTUARIAL STUDIES OF THE VARIOUS PLANS  
6 DISTINGUISH BETWEEN COSTS OF BENEFITS ASSOCIATED WITH  
7 HAVING PROVIDED REGULATED ELECTRIC SERVICE AS  
8 CONTEMPLATED BY PURA § 36.065 AND THOSE NOT ASSOCIATED  
9 WITH HAVING PROVIDED REGULATED ELECTRIC SERVICE?

10 A. Yes. Costs associated with providing regulated electric service are  
11 labeled "Recoverable" in all of my exhibits, while costs not associated with  
12 providing regulated electric service are labeled "Nonrecoverable."  
13 Nonrecoverable costs are not included in test year cost because they are  
14 not associated with regulated service either prior to or after the date of  
15 unbundling.

16 Q. HOW WAS THE GAAP NET PERIODIC PENSION COST DETERMINED  
17 FOR THE 2021 TEST YEAR AND THE SUBSEQUENT 2022 FISCAL  
18 YEAR?

19 A. Aon, on behalf of Oncor and Vistra, performed six actuarial studies  
20 regarding net periodic pension costs in accordance with GAAP guidelines  
21 as described earlier in Section III of my direct testimony for the test year  
22 and the subsequent fiscal year. The results of these studies for the fiscal  
23 year ending December 31, 2022, are attached as Exhibits AST-1, AST-2  
24 and AST-3 to my direct testimony. The results of these studies for the test  
25 year ending December 31, 2021, are attached as Exhibits AST-6, AST-7  
26 and AST-8 to my direct testimony.

27 Q. DOES THE GAAP NET PERIODIC PENSION COST DETERMINED FOR  
28 THE 2021 TEST YEAR REFLECT THE MOST APPROPRIATE ON-  
29 GOING LEVEL OF PENSION COSTS?

30 A. No. GAAP requires that pension costs be measured each fiscal year

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1 based on benefit obligations and plan assets as of the last day of the prior  
2 fiscal year. Therefore, the GAAP pension cost for fiscal year 2022,  
3 reflecting known and measurable changes during 2021 and shown in the  
4 fiscal year 2022 actuarial studies, is a better measure of the on-going level  
5 of pension costs.

6 Q. FROM YOUR ANALYSIS, WHAT IS THE APPROPRIATE GAAP  
7 PENSION COST FOR ONCOR BASED ON THE 2022 ACTUARIAL  
8 STUDIES?

9 A. As set forth in Exhibit AST-1, the GAAP recoverable pension cost  
10 determined for Oncor under the Oncor Retirement Plan for fiscal year  
11 2022 is \$44,958,584. As set forth in Exhibit AST-2, the GAAP recoverable  
12 pension cost determined for Oncor related to the Vistra Retirement Plan  
13 for fiscal year 2022 is \$(3,251,157). As set forth in Exhibit AST-3, the  
14 GAAP recoverable pension cost for Oncor under the Oncor Supplemental  
15 Retirement Plan for fiscal year 2022 is \$6,309,066. I have provided this  
16 information to Company witness Mr. W. Alan Ledbetter for inclusion in  
17 rates. These costs are reasonable and necessary.

18 Q. WHY IS THE VISTRA RETIREMENT PLAN GAAP RECOVERABLE  
19 PENSION COST NEGATIVE FOR FISCAL YEAR 2022?

20 A. As described earlier in my testimony, the GAAP pension cost for a fiscal  
21 year is made up of several components. For fiscal year 2022, the  
22 expected return on recoverable assets for the Vistra Retirement Plan  
23 exceeds the sum of the recoverable service cost, interest cost and  
24 amortization amounts. As a result, the net GAAP recoverable pension  
25 cost for fiscal year 2022 is negative.

26 Q. DID THE GAAP RECOVERABLE PENSION COST FOR FISCAL YEAR  
27 2022 CHANGE FROM THE COMPARABLE AMOUNT FOR FISCAL  
28 YEAR 2017 DESCRIBED IN YOUR PRIOR DIRECT TESTIMONY IN  
29 COMMISSION DOCKET NO. 46957, ONCOR'S LAST BASE RATE  
30 CASE?

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1 A. Yes. The total GAAP recoverable pension cost for fiscal year 2022 shown  
2 above is \$48,016,493. This compares with \$80,911,733 in total GAAP  
3 recoverable pension cost for fiscal year 2017 included in my prior direct  
4 testimony in Docket No. 46957.

5 Q. WHY DID THE GAAP RECOVERABLE PENSION COST DECREASE  
6 FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?

7 A. As described earlier in Section III of my testimony, the GAAP pension cost  
8 for a fiscal year has several components. The service cost represents the  
9 cost of benefits earned by employees during the current fiscal year. The  
10 total of the interest cost, expected return on plan assets, and amortization  
11 amounts for the year represents the portion of the unfunded PBO as of the  
12 end of the prior fiscal year that is recognized during the current fiscal  
13 year. Because the GAAP pension cost is measured annually, these  
14 amounts change every fiscal year. To simplify the discussion below,  
15 monetary amounts are rounded to the nearest tenth of one million dollars.

16 Q. HOW DID THE RECOVERABLE SERVICE COST COMPONENT  
17 CHANGE FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?

18 A. From fiscal year 2017 to fiscal year 2022, the recoverable service cost  
19 increased by \$7.3 million. The increase in service cost was primarily due  
20 to a decrease in discount rates used to calculate the service cost.  
21 Changes in discount rates are dictated by changes in market interest  
22 rates, which are outside of Oncor's control.

23 Q. HOW DID THE RECOVERABLE UNFUNDED PBO CHANGE FROM  
24 DECEMBER 31, 2016, TO DECEMBER 31, 2021?

25 A. The GAAP recoverable pension cost for fiscal year 2017 is based on the  
26 unfunded PBO as of December 31, 2016. Similarly, the GAAP  
27 recoverable pension cost for fiscal year 2022 is based on the unfunded  
28 PBO as of December 31, 2021. From December 31, 2016, to December  
29 31, 2021, the recoverable unfunded PBO decreased by \$256.0 million.  
30 The decrease is attributable to the following:

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- 1           • The expected change in the unfunded PBO is equal to the  
2           difference between the interest cost on the PBO and the expected  
3           return on plan assets. The recoverable interest cost during the  
4           period exceeded the recoverable expected investment return by  
5           \$5.7 million, increasing the unfunded PBO by this amount.
- 6           • The actual return on recoverable plan assets during the period  
7           exceeded the expected return on plan assets by \$479.2 million.  
8           The favorable investment return reduced the unfunded PBO by this  
9           amount.
- 10          • Oncor contributed \$374.9 million to the recoverable portion of the  
11          pension plans during the period. Contributions to the plans in  
12          excess of the service cost during the period reduced the unfunded  
13          PBO by \$238.4 million.
- 14          • The unfunded PBO is impacted by the discount rates used to  
15          calculate the PBO. Because the discount rates were lower as of  
16          December 31, 2021, than as of December 31, 2016, the  
17          recoverable unfunded PBO increased by \$417.0 million during the  
18          period. As with the service cost calculation, changes in discount  
19          rates are dictated by changes in market interest rates, which are  
20          outside of Oncor's control.
- 21          • The unfunded PBO is also impacted by actual plan demographic  
22          experience differing from expected based on the actuarial  
23          assumptions as well as changes in actuarial assumptions. The  
24          recoverable unfunded PBO increased by \$38.9 million during the  
25          period due to these factors.

26   Q.   HOW DID THE CHANGE IN RECOVERABLE UNFUNDED PBO IMPACT  
27          THE GAAP RECOVERABLE PENSION COST FROM FISCAL YEAR  
28          2017 TO FISCAL YEAR 2022?

29   A.   Based on the reduction in unfunded PBO of \$256.0 million from December  
30          31, 2016, to December 31, 2021, the total interest cost, expected return

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- 1 on plan assets, and amortization components of recoverable pension cost  
2 decreased by \$40.2 million from fiscal year 2017 to fiscal year 2022.
- 3 Q. WHAT WAS THE NET CHANGE IN THE GAAP RECOVERABLE  
4 PENSION COST FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?
- 5 A. From fiscal year 2017 to fiscal year 2022, the recoverable service cost  
6 increased by \$7.3 million and the total interest cost, expected return on  
7 plan assets, and amortization components of recoverable pension cost  
8 decreased by \$40.2 million. The net impact is a decrease in GAAP  
9 recoverable pension cost of \$32.9 million as the adverse impact of lower  
10 discount rates, other assumption updates, and unfavorable plan  
11 demographic experience was more than offset by strong investment  
12 performance and Oncor's plan contributions.
- 13 Q. DID ONCOR TAKE ANY PENSION RISK TRANSFER ACTIONS SINCE  
14 THE LAST RATE CASE IN 2017 TO SETTLE ANY OF ITS  
15 RECOVERABLE PENSION OBLIGATIONS?
- 16 A. Yes. In 2019, Oncor transferred \$74.6 million of recoverable PBO and  
17 corresponding plan assets for 1,640 retirees and beneficiaries in pay  
18 status with recoverable service from the Oncor Retirement Plan to Pacific  
19 Life Insurance Company, a high-quality insurance carrier specializing in  
20 the pension annuity business. In 2020, Oncor offered one-time lump sum  
21 payments, in lieu of future pension annuities, to 3,771 former employees  
22 covered by the Oncor Retirement Plan who were not yet in pay status. Of  
23 the group included in the voluntary offer, 619 former employees with  
24 recoverable service accepted one-time payments, reducing recoverable  
25 PBO and corresponding plan assets by \$28.8 million. In 2021, Oncor  
26 transferred \$78.1 million of recoverable PBO and corresponding plan  
27 assets for another 880 retirees and beneficiaries in pay status with  
28 recoverable service from the Oncor Retirement Plan to Pacific Life  
29 Insurance Company.
- 30 Q. WHAT IMPACT DID THE 2019, 2020, AND 2021 PENSION RISK

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1           TRANSFER TRANSACTIONS HAVE ON THE ONCOR RETIREMENT  
2           PLAN?

3       A.    By taking these actions, Oncor reduced its plan administration burden and  
4           eliminated future premiums paid to the Pension Benefit Guarantee  
5           Corporation ("PBGC") related to the impacted plan participants. The  
6           recoverable PBGC premium savings during 2020 through 2022  
7           attributable to the three transactions was \$6.3 million, with additional  
8           annual savings expected in future years. In addition, the transactions  
9           reduced the size of the Oncor Retirement Plan subject to rate recovery by  
10          \$181.5 million. A smaller plan carries less financial market risk and  
11          reduces the volatility of future GAAP recoverable pension cost.

12       Q.   HOW WAS THE GAAP NET PERIODIC POSTRETIREMENT BENEFIT  
13           COST DETERMINED FOR THE 2021 TEST YEAR AND THE  
14           SUBSEQUENT 2022 FISCAL YEAR?

15       A.    Aon, on behalf of Oncor and Vistra, performed four actuarial studies  
16           regarding net periodic postretirement benefit costs in accordance with  
17           GAAP guidelines as described earlier in Section IV for the test year and  
18           the subsequent fiscal year. The results of the studies for fiscal year  
19           ending December 31, 2022, are attached as Exhibits AST-4 and AST-5 to  
20           my direct testimony. The results of the studies for the test year ending  
21           December 31, 2021, are attached as Exhibits AST-9 and AST-10 to my  
22           direct testimony.

23       Q.    DOES THE GAAP NET PERIODIC POSTRETIREMENT BENEFIT COST  
24           DETERMINED FOR THE 2021 TEST YEAR REFLECT THE MOST  
25           APPROPRIATE ON-GOING LEVEL OF POSTRETIREMENT BENEFIT  
26           COSTS?

27       A.    No. GAAP requires that postretirement benefit costs be measured each  
28           fiscal year based on benefit obligations and plan assets as of the last day  
29           of the prior fiscal year. Therefore, the GAAP postretirement benefit cost  
30           for fiscal year 2022, reflecting known and measurable changes during

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1 2021 and shown in the fiscal year 2022 actuarial studies, is a better  
2 measure of the on-going level of postretirement benefit costs.

3 Q. FROM YOUR ANALYSIS, WHAT IS THE APPROPRIATE GAAP  
4 POSTRETIREMENT BENEFIT COST FOR ONCOR BASED ON THE  
5 2022 ACTUARIAL STUDIES?

6 A. As set forth in Exhibit AST-4, the GAAP recoverable postretirement benefit  
7 cost determined for Oncor under the Oncor Retiree Welfare Plan for fiscal  
8 year 2022 is \$8,616,786. As set forth in Exhibit AST-5, the GAAP  
9 recoverable postretirement benefit cost determined for Oncor under the  
10 Shared Retiree Welfare Plan for fiscal year 2022 is \$10,273,842. I have  
11 provided this information to Company witness Mr. W. Alan Ledbetter for  
12 inclusion in rates. These costs are reasonable and necessary.

13 Q. DID THE GAAP RECOVERABLE POSTRETIREMENT BENEFIT COST  
14 FOR FISCAL YEAR 2022 CHANGE FROM THE COMPARABLE  
15 AMOUNT FOR FISCAL YEAR 2017 DESCRIBED IN YOUR PRIOR  
16 DIRECT TESTIMONY IN COMMISSION DOCKET NO. 46957, ONCOR'S  
17 LAST BASE RATE CASE?

18 A. Yes. The total GAAP recoverable postretirement benefit cost for fiscal  
19 year 2022 shown above is \$18,890,628. This compares with \$56,906,188  
20 in total GAAP recoverable postretirement cost for fiscal year 2017  
21 included in my prior direct testimony in Docket No. 46957.

22 Q. WHY DID THE GAAP RECOVERABLE POSTRETIREMENT BENEFIT  
23 COST DECREASE FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?

24 A. As described earlier in Section IV of my direct testimony, the GAAP  
25 postretirement benefit cost for a fiscal year has several components. The  
26 service cost represents the cost of benefits earned by employees during  
27 the current fiscal year. The total of the interest cost, expected return on  
28 plan assets, and amortization amounts for the year represents the portion  
29 of the unfunded APBO as of the end of the prior fiscal year that is  
30 recognized during the current fiscal year. Because the GAAP

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1 postretirement benefit cost is measured annually, these amounts change  
2 every fiscal year. To simplify the discussion below, monetary amounts are  
3 rounded to the nearest tenth of one million dollars.

4 Q. HOW DID THE RECOVERABLE SERVICE COST COMPONENT  
5 CHANGE FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?

6 A. From fiscal year 2017 to fiscal year 2022, the recoverable service cost  
7 decreased by \$2.7 million. The service cost increased due to a decrease  
8 in discount rates. Changes in discount rates are dictated by changes in  
9 market interest rates, which are outside of Oncor's control. However, that  
10 increase was more than offset by a decrease in service cost due to the  
11 normal operation of the plan resulting in fewer Oncor employees being  
12 eligible for future subsidized retiree medical coverage.

13 Q. HOW DID THE RECOVERABLE UNFUNDED APBO CHANGE FROM  
14 DECEMBER 31, 2016, TO DECEMBER 31, 2021?

15 A. The GAAP recoverable postretirement benefit cost for fiscal year 2017 is  
16 based on the unfunded APBO as of December 31, 2016. Similarly, the  
17 GAAP recoverable postretirement benefit cost for fiscal year 2022 is  
18 based on the unfunded PBO as of December 31, 2021. From December  
19 31, 2016, to December 31, 2021, the recoverable unfunded APBO  
20 decreased by \$258.4 million. The decrease is attributable to the following:

- 21 • The expected change in the unfunded APBO is equal to the  
22 difference between the interest cost on the APBO and the expected  
23 return on plan assets. The recoverable interest cost during the  
24 period exceeded the recoverable expected investment return by  
25 \$151.7 million, increasing the unfunded APBO by this amount.
- 26 • The actual return on recoverable plan assets during the period  
27 exceeded the expected return on plan assets by \$25.4 million. The  
28 favorable investment return reduced the unfunded APBO by this  
29 amount.
- 30 • Oncor contributed \$176.0 million to the recoverable portion of the

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- 1 postretirement benefit plans during the period. Contributions to the  
2 plans in excess of the service cost during the period, reduced the  
3 unfunded APBO by \$144.8 million.
- 4 • The unfunded APBO is impacted by the discount rates used to  
5 calculate the APBO. Because the discount rates were lower as of  
6 December 31, 2021, than as of December 31, 2016, the  
7 recoverable unfunded APBO increased by \$180.5 million during the  
8 period. As with the service cost calculation, changes in discount  
9 rates are dictated by changes in market interest rates, which are  
10 outside of Oncor's control.
  - 11 • The adoption of fully-insured medical coverage for the Shared  
12 Retiree Welfare Plan resulted in a significant reduction in the plan's  
13 APBO. That reduction was partially offset by small improvements  
14 in other medical and life coverage during the period in the Oncor  
15 Retiree Welfare Plan. The net impact of these changes is a  
16 reduction in recoverable unfunded APBO of \$75.3 million.
  - 17 • Retiree health care costs increased at a slower rate than assumed  
18 during the period. As a result, the recoverable unfunded APBO  
19 decreased by \$294.0 million.
  - 20 • The unfunded APBO is also impacted by actual plan demographic  
21 experience differing from expected based on the actuarial  
22 assumptions as well as changes in actuarial assumptions. The  
23 recoverable unfunded APBO decreased by \$51.1 million during the  
24 period due to these factors.
- 25 Q. HOW DID THE CHANGE IN RECOVERABLE UNFUNDED APBO  
26 IMPACT THE GAAP RECOVERABLE POSTRETIREMENT BENEFIT  
27 COST FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?
- 28 A. Based on the reduction in unfunded APBO of \$258.4 million from  
29 December 31, 2016, to December 31, 2021, the total interest cost,  
30 expected return on plan assets, and amortization components of

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1 recoverable pension cost decreased by \$35.3 million from fiscal year 2017  
2 to fiscal year 2022.

3 Q. WHAT WAS THE NET CHANGE IN THE GAAP RECOVERABLE  
4 POSTRETIREMENT BENEFIT COST FROM FISCAL YEAR 2017 TO  
5 FISCAL YEAR 2022?

6 A. From fiscal year 2017 to fiscal year 2022, the recoverable service cost  
7 decreased by \$2.7 million and the total interest cost, expected return on  
8 plan assets, and amortization components of recoverable postretirement  
9 benefit cost decreased by \$35.3 million. The net impact is a decrease in  
10 GAAP recoverable postretirement benefit cost of \$38.0 million as the  
11 expected increase in the unfunded APBO and adverse impact of lower  
12 discount rates were more than offset by Oncor's effective plan  
13 management, contributions made to the plans, favorable participant  
14 experience, and strong investment performance.

15 **VI. CONCLUSION**

16 Q. PLEASE SUMMARIZE YOUR DIRECT TESTIMONY.

17 A. The following summarizes my direct testimony:

- 18 • Pension and OPEB accounting is governed by GAAP and related  
19 regulatory provisions.
- 20 • Based on the actuarial valuations prepared by Aon in accordance  
21 with GAAP, as documented in Exhibits AST-1 through AST-5,  
22 Oncor's annual recoverable pension and OPEB costs for fiscal year  
23 2022, reflecting known and measurable changes subsequent to the  
24 2021 test year, are \$66.9 million.
- 25 • Oncor's annual recoverable pension and OPEB costs for fiscal year  
26 2022 are \$70.9 million lower than the corresponding costs of  
27 \$137.8 million for fiscal year 2017 as reflected in Commission  
28 Docket 46957, Oncor's last base rate case.
- 29 • The recoverable pension and OPEB costs calculated under GAAP  
30 and related regulatory provisions are reasonable and customary.

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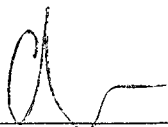
- 1 Q. WHAT ARE YOUR OVERALL CONCLUSIONS?
- 2 A. Based on applicable accounting rules, regulatory provisions, and actuarial
- 3 reports, the Commission should allow Oncor recovery of its reasonable
- 4 and necessary pension and OPEB costs as set forth in my testimony.
- 5 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
- 6 A. Yes.

**AFFIDAVIT**

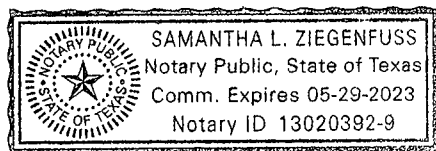
**STATE OF TEXAS       §**  
**§**  
**COUNTY OF DALLAS   §**

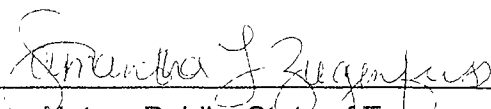
**BEFORE ME**, the undersigned authority, on this day personally appeared Alan S. Taper, who, having been placed under oath by me, did depose as follows:

My name is Alan S. Taper. I am of legal age and a resident of the State of Texas. The foregoing testimony and exhibits offered by me are true and correct, and the opinions stated therein are accurate, true and correct.

  
\_\_\_\_\_  
Alan S. Taper

**SUBSCRIBED AND SWORN TO BEFORE ME** by the said Alan S. Taper  
this 15<sup>th</sup> day of April, 2022.



  
\_\_\_\_\_  
Notary Public, State of Texas

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EXHIBIT AST-1  
EXHIBIT AST-2  
EXHIBIT AST-3  
EXHIBIT AST-4  
EXHIBIT AST-5  
EXHIBIT AST-6  
EXHIBIT AST-7  
EXHIBIT AST-8  
EXHIBIT AST-9  
EXHIBIT AST-10

The information is confidential and will be made available only after execution of a certification to be bound by the draft protective order set forth in Section VII of this Rate Filing Package or a protective order issued in this docket.

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**2022 RATE CASE  
ONCOR ELECTRIC DELIVERY COMPANY LLC  
WORKPAPERS FOR  
THE DIRECT TESTIMONY OF  
ALAN S. TAPER**

Mr. Taper has no supporting workpapers for his direct testimony.

**INDEX TO THE DIRECT TESTIMONY  
OF MATTHEW A. TROXLE, WITNESS FOR  
ONCOR ELECTRIC DELIVERY COMPANY LLC**

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**DIRECT TESTIMONY OF MATTHEW A. TROXLE**

**I. POSITION AND QUALIFICATIONS**

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- Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT EMPLOYMENT POSITION.
- A. My name is Matthew A. Troxle. My business address is 1616 Woodall Rodgers, Dallas, Texas. I am the Director of Rates & Load Research for Oncor Electric Delivery Company LLC (“Oncor” or “Company”).
- Q. PLEASE DISCUSS YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL QUALIFICATIONS.
- A. I graduated from Louisiana State University in 1995 with a Bachelor of Science degree in Business Administration Pre-Law. In 1997, I received the degree of Master of Science in Economics from Louisiana State University. I began my employment with the Louisiana Public Service Commission in 1997 as an Economist in the Economics and Rate Analysis Division. In 1999, I began employment with the Public Utility Commission of Texas (“Commission”) as a Rate Analyst. In 2000, I was named Senior Rate Analyst, and in 2005, I was promoted to be the Director of Retail Market Oversight. In 2007, I became the Director of the newly formed Tariff and Rate Analysis group. In 2008, I began employment with CenterPoint Energy Service Company as a Manager of Gas Rates in the Regulatory and Government Affairs organization. In 2012, I was promoted to the Director of Rates position, and in 2015, I assumed the position of Director of Regulatory Affairs for Louisiana and Mississippi. In 2019, I joined Oncor in my current role as the Director of Rates & Load Research. In my current position, I am responsible for oversight of the rates and load research efforts of Oncor.
- Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY BEFORE THE COMMISSION?
- A. Yes. Please see my Exhibit MAT-1 for a list of the Commission proceedings

1 in which I have provided testimony.

2 **II. PURPOSE OF DIRECT TESTIMONY**

3 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS  
4 PROCEEDING?

5 A. The purpose of my direct testimony is to: (1) present the Oncor Rate Class  
6 Cost of Service Study in support of the Company's proposed Tariff for Retail  
7 Delivery Service ("Retail Tariff") and the rates included in the Tariff for  
8 Transmission Service ("Transmission Tariff"); (2) support the calculation of  
9 the proposed Retail Delivery Service rates and Discretionary Service  
10 charges; (3) support the proposed changes to the Company's Tariffs; (4)  
11 support the calculation of the proposed Network Transmission Service  
12 ("NTS") rate, the Wholesale Substation Service ("XFMR") rate, the  
13 Wholesale Distribution Line Service ("DLS") rate, Oncor Electric Delivery  
14 Company NTU LLC's ("Oncor NTU") Wholesale Distribution Substation  
15 Service ("WDSS") rate; and (5) sponsor the proposed Tariff for Retail  
16 Delivery Service, the proposed Tariff for Transmission Service for both  
17 Oncor and Oncor NTU, and Rate Filing Package ("RFP") Schedules I-A, II-  
18 I-1, II-I-2, II-I-3, IV-J-1, IV-J-2, IV-J-3, IV-J-6, and IV-J-7.

19 Q. WERE YOUR TESTIMONY AND THE COST OF SERVICE SCHEDULES  
20 YOU SPONSOR PREPARED BY YOU OR UNDER YOUR DIRECT  
21 SUPERVISION?

22 A. Yes. My testimony, exhibits, the schedules that I sponsor, and associated  
23 workpapers were prepared by me or under my direction, supervision, or  
24 control and are true and correct.

25 **III. RATE CLASS COST OF SERVICE & RATE DESIGN SCHEDULES**

26 Q. PLEASE DESCRIBE THE SCHEDULES YOU ARE SPONSORING THAT  
27 PERTAIN TO THE RATE CLASS COST ALLOCATION PROCESS AND  
28 THAT SUPPORT THE RATE CLASS COST OF SERVICE STUDY.

29 A. Schedule I-A: Cost of Service Summary.

30 Schedule II-I-1: Class Revenue Requirement Analysis – This schedule

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1 provides the Rate Class Cost of Service Study and includes the revenue  
2 requirement analysis for the test year.

3 Schedule II-I-2: Class Allocation Factors – This schedule provides a listing  
4 of the allocation factors used to assign costs to the various rate classes.

5 Schedule II-I-3: Functionalized Cost of Service Analysis (Non-ERCOT  
6 Members) – This schedule is not applicable, as the Company is an Electric  
7 Reliability Council of Texas (“ERCOT”) member.

8 Q. PLEASE DESCRIBE THE RFP SCHEDULES YOU ARE SPONSORING  
9 THAT PERTAIN TO THE COMPANY’S RATE DESIGN PROCESS.

10 A. Schedule IV-J-1: Revenue Summary – This schedule provides a revenue  
11 summary of the base-rate revenue requirements, by function and by rate  
12 class, for the test-year.

13 Schedule IV-J-2: Proposed Charges for Discretionary Services and Other  
14 Services – This schedule shows the proposed charges for each  
15 discretionary and other service charge included in the Tariff for Retail  
16 Delivery Service and the Tariff for Transmission Service.

17 Schedule IV-J-3: Rate Class Definition – This schedule provides the  
18 definition of all retail rate classes.

19 Schedule IV-J-6: Justification for Consumption Level-Based Rates – This  
20 schedule is not applicable, as the Company is not proposing any  
21 consumption level-based rates.

22 Schedule IV-J-7: Proof of Revenue Statement – This schedule provides a  
23 proof of revenue statement that shows the proposed prices and the resulting  
24 base revenue, by rate class, for each applicable charge.

25 **IV. RATE CLASS COST OF SERVICE STUDY**

26 **A. General Concepts**

27 Q. PLEASE DISCUSS THE GENERAL CONCEPT OF PERFORMING A  
28 RATE CLASS COST OF SERVICE STUDY THAT YOU APPLIED IN THIS  
29 PROCEEDING.

30 A. A rate class cost of service study is an accounting and engineering analysis

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2022 Rate Case

1 of cost causation that determines the proper allocation of the Company's  
2 plant investment, revenues, and expenses to the appropriate rate classes.  
3 The allocation process utilizes the unique customer, energy, demand, and  
4 revenue characteristics of each rate class and the interrelationship of those  
5 characteristics to determine the class cost responsibility. The resulting  
6 allocations based on the customer (premise), energy (kWh), revenue (class  
7 revenue requirement), and demand (kW) characteristics for each rate class  
8 are used to support the design of compensatory and equitable rates. In this  
9 testimony, unless otherwise specified, the term "customer" refers to a  
10 premise or a point of delivery.

## 11 **B. The Allocation Process**

12 The allocation process in any rate class cost of service study involves  
13 four major steps: (1) functionalization of all revenue, expense, and rate  
14 base accounts (see Schedules II-B-1 through II-B-12, as described in the  
15 direct testimony of Company witness Mr. W. Alan Ledbetter); (2)  
16 classification of all revenue, expense, and rate base accounts; (3)  
17 development of allocation factors based on the data obtained from the  
18 books and records of the Company for the test year; and (4) allocation of  
19 the revenue, expense, and rate base accounts based on the allocation  
20 factors developed in (3) above. The data used in this process include  
21 information such as: number of customers in each rate class; rate class  
22 demand (kW) and kWh sales; operating and maintenance expenses;  
23 depreciation; taxes; capital costs associated with system investment; and  
24 property records. These four major steps are summarized as follows.

### 25 **1. Functionalization**

26 The first step is to group all accounts according to major function to  
27 assist in determining which rate classes are responsible for the various  
28 costs. In this proceeding, the major functions used are:

- 29 • Transmission ("TRAN");
- 30 • Distribution ("DIST");