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

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

Notes:

(1) Company-provided.

(2) From page 2 of this Exhibit.

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

Line No.	Principal Methods	Proxy Group of Fourteen Electric Companies
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)	12.60%
5.	Indicated Range of Common Equity Cost Rates	9.60% - 11.60%
6.	Recommended Common Equity Cost Rate	10.30%
(From Exhibit DWD-3. From page 1 of Exhibit DWD-4. From page 1 of Exhibit DWD 5. 	

- (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

	<u>2021</u>		<u>2020</u> (M	ILLI	2019 ONS OF DOLLA	RS)	2018		2017			
CAPITALIZATION STATISTICS			,			,						
AMOUNT OF CAPITAL EMPLOYED TOTAL PERMANENT CAPITAL SHORT-TERM DEBT TOTAL CAPITAL EMPLOYED	\$34,183.780 \$1,152.131 \$35,335 911		\$31,746.146 \$954.222 \$32,700.368	× =	\$29,472 393 \$985.672 \$30,458 065		\$27,131 517 \$1,070.510 \$28,202 027		\$25,522 450 \$977.275 \$26,499.725			
INDICATED AVERAGE CAPITAL COST RATES (2) TOTAL DEBT PREFERRED STOCK	3.67 4.60	%	4.08 5 47	%	4.29 5 17	%	4.42 5 26	%	4.36 4 67	%	<u>5 year</u>	
CAPITAL STRUCTURE RATIOS BASED ON TOTAL PERMANENT CAPITAL· LONG-TERM DEBT PREFERRED STOCK COMMON EQUITY TOTAL	56.51 0 61 42.88 100.00		55.26 0.78 43 96 100.00		53.49 0.91 <u>45 60</u> 100.00		52.83 0.91 <u>4626</u> 100.00		52.69 0.96 <u>4635</u> 100.00		AVERAC 54.16 0.83 45 01 100.00	%
BASED ON TOTAL CAPITAL [.] TOTAL DEBT, INCLUDING SHORT-TERM PREFERRED STOCK COMMON EQUITY TOTAL	57 78 0 58 <u>41 64</u> 100.00		\$6.42 0.75 <u>42.84</u> 100.00		54 62 0.89 44 49 100.00		54.17 0.88 44.95 100 00		54.42 0.90 44.69 100.00		55 48 0.80 <u>43.72</u> 100.00	
FINANCIAL STATISTICS FINANCIAL RATIOS - MARKET BASED EARNINGS / PRICE RATIO	5.38	%	4.15	%	5 43	%	4 84	%	• 462	%	4.88	%
MARKET / ÁVERAGE BOOK RATIO DIVIDEND YIELD DIVIDEND PAYOUT RATIO	190 71 3.59 71.08		186.80 3.65 84 32		196 49 3 42 63 09		191 32 3 71 69.23		199 93 3 48 89 30		193.05 3.57 75.40	
RATE OF RETURN ON AVERAGE BOOK COMMON EQUITY	10 05	%	7 87	%	10 46	%	870	%	8 66	%	915	%
<u>TOTAL DEBT / EBITDA (3)</u>	5.35	x	6.07	x	4.63	x	5.37	x	4.55	x	5.19	x
FUNDS FROM OPERATIONS / TOTAL DEBT (4)	976	%	11.65	%	13.05	%	17.91	%	17.17	%	13 91	%
TOTAL DEBT / TOTAL CAPITAL	5778	%	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

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

	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>	2017	<u>5 YEAR</u> <u>AVERAGE</u>
Alliant Energy Corporation						
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	100.00 %	100,00 %	100.00 %	100.00 %	100.00 %	100.00 %
Ameren Corporation						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
American Electric Power Company, Inc.						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Duke Energy Corporation						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Edison International						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Entergy Corporation						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Evergy, Inc.						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00_%	100.00 %
Eversource Energy						
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	%	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %

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

	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>5 YEAR</u> AVERAGE
IDACORP, Inc						
Long-Term Debt	42.85 %	43.86 %	42.70 %	43.63 %	43.68 %	43.34 %
Preferred Stock	-	-	-	-	- 56.32	-
Common Equity	<u> </u>	<u>56.14</u> 100.00 %	<u> </u>	<u>56.37</u> 100.00 %	<u> </u>	<u>56.66</u> 100.00 %
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
NorthWestern Corporation						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
OGE Energy Corporation						
Long-Term Debt	52.57 %	49.04 %	43.56 %	44.00 %	43.78 %	46.59 %
Preferred Stock	-	-	-	-	13.70 70	-
Common Equity	47.43	50 96	56.44	56 00	5622	53.41
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Portland General Electric Company						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
The Southern Company						
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	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Verl Durane Inc						
<u>Xcel Energy Inc.</u> Long-Term Debt	58.91 %	57.93 %	57.77 %	5701 %	56.66 %	57.66 %
Preferred Stock	50.71 70	-	-	5701 70	-	57.00 %
Common Equity	41.09	42.07	42.23	42 99	43.34	42.34
Total Capital	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
Proxy Group of Fourteen Electric						
Companies						_
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	100.00 %	100 00 %	100.00 %	100.00 %	100.00 %	100.00 %

Source of Information

Annual Forms 10-K

Oncor Electric Delivery Company LLC Operating Subsidiary Company Capital Structures of the <u>Proxy Group of Fourteen Electric Companies</u>

Parent Long. Company Name Ticker Equity Preferred Term Total Interstate Power and Light Company LNT \$3.75% 0.00% 49.15% 100.00% Wisconsin Power and Light Company LNT \$3.75% 0.00% 46.25% 100.00% Union Electric Company AEE \$5.73% 0.49% 43.75% 100.00% Appalachian Power Company AEP 48.64% 0.00% \$5.578% 100.00% Indian Michigan Power Company AEP 44.65% 0.00% \$5.78% 100.00% Kentucky Power Company AEP 44.82% 0.00% \$5.78% 100.00% Volto Power Company AEP 48.35% 0.00% \$5.105% 100.00% Southwestern Electric Power Company AEP 48.35% 0.00% \$5.187% 100.00% Wheeling Power Company AEP NA NA NA NA Duke Energy Indias, LLC DUK NA NA NA NA Duke Energy P				2	021	
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	Southwestern Public Service Company			0.00%	45.54%	100.00%
Maximum <u>58.26%</u> <u>4.64%</u> <u>59.04%</u> <u>100.00%</u>		Minimum	40.96%	0.00%	41.74%	100.00%
		Maximum	58.26%	4.64%	59.04%	100.00%

Source: S&P Global Market Intelligence

	[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 %	853 %
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 4 9	9.17
Entergy Corporation	3.70	3.00	1.00	6.00	3.33	3.76	7.09
Evergy, Inc	3 55	7.50	610	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 0 0	4.30	4 4 0	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	8.89 %
						Median	921 %
					Average of Me	an and Median	9.05 %

<u>Oncor Electric Delivery Company LLC</u> Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the <u>Proxy Group of Fourteen Electric Companies</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% x (1+(1/2 x 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

Exhibit DWD-3 Page 2 of 15

	IAN	IT FN	VER(R	ECENT RICE	58.4	0 P/E RATI	o 21.	9 (Traili Medi	ng: 22,3) an: 20.0)	RELATIVE P/E RATI		2 DIV D YLD	3.0	% V	Page ALU LINE	2 of 1	5
TIMELI		B Raised 1		High	22.2	23 8 20 9	27 1 21 9	34 9 25 0	35 4 27 1	41.0	45 6 36 6	46 6 36 8	55 4 40 8	60 3 37 7	62 3 46 0	61 9 54 8			Targe	Price	
SAFET	Y 2	2 Raised 9		Low.				250	2/1	30.4	300	300	40.6	3//	400	340			2025	2026	2027
TECHN		3 Lowered	3/11/22	di L Bi	vided by In elative Pric	iterest Rate e Strength	·								``	·					
	85 (1.00			2-for-1 sp Options	olit 5/16 Yes					2-107-1	<u> </u>		11 ¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹¹	II ANI	הויתה ח	•					
18-Mo Low-Hi		get Price Ipoint (%		Shaded	area indic.	ates recess			1	THEFT	Training a	17 114		[40
\$50-\$78	ç	(10%)	to wiru)			Lugar 1111		1000													25
		OJECTIC	ONS	11" ITHILL																	15
	Price	Gain	nn'i Total Return						<u>}.</u>	·····			••••	·· ····							10
High Low	65 (50	+10%) (~15%)	6% Nil															4 w TO	i T. RETUP	1	-75
Institu	tional 202021	Decisio 302021	ns 402021				ł													L ARITH	
to Buy to Sell	236	237	290 244	Percen shares	16 -		· · · · ·			Lu, Ilat					· · · · · ·			1 yr. 3 yr	31.4 39.1	15 1 61.1	F
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2006 14.46	2007 15 57	2008 16.67	2009 15.51	2010 15,40	2011 16.51	2012 13.94	2013 14.77	2014 15.10	14.34	2016 14,58	2017 14 62	2018 14 97	14.89	2020 13.67	2021 14.65	15.55	16.10		es per sh	UD. LLU	25-27
216	2.56	2.28	2.10	2.60	2.75	2.95	3.34	3 49	3 45	3.43	3.97	4.32	4.59	4.92	5 25	5.55	5.90	"Cash F	low" per		7.00
1 03 .58	1.35	1.27	.95 .75	1 38 .79	1.38	1.53 90	1.65 .94	1.74	1.69	1.65	1.99 1 26	2.19 1.34	2,33	2 47 1.52	2,63 1,61	2.75 1.71	2.90	, v	s per sh cl'd per s		3.25 2.15
1 71	2.46	3.98	5.43	3.91	3.03	5.22	3 32	3.78	4.25	5.26	6.34	6.92	6.69	5.47	4.67	5.90	5.90	Cap'l Sp	ending p	ersh	6.25
11.42	12.15	12.78	12.54	13.05	13.57 222,04	14.12 221.97	14.79	15 54	16.41 226 92	16.96	18.08 231.35	19.43 236.06	21.24	22 76 249.87	23.91 250 47	25.00 251.00	26 15		lue per si n Shs Ou		29.75 253.00
232.25 16.8	220.72	13.4	13 9	12.5	14.5	14.5	15.3	16.6	18.1	22,3	20 6	191	243.02	243.07	21.2	Bold fig			'I P/E Rat		18.0
.91	.80	.81	.93	.80	.91	.92	.86	.87	.91	1.17	1 04	1.03	1 13	1.09	1.13	Value estin		1	P/E Ratio		1.00
3.3%	NTAL STRUCTURE as of 12/31/21 3094 5 3276 8 3350 3 3253 6 3320.0 3382.2 3534 5 3647.7 3416.0 3669.0 3900 4050 Revenues (\$mill) 455 Id Debt \$7883 mill Due in 5 Yrs \$2665 mill. 3378 382.1 395.7 390 9 384.0 466 1 522.3 567 4 624.0 674 0 695 730 Net Profit (\$mill) 46 674 0 695 730 Net Profit (\$mill) 68 46 674 0 695 730 Net Profit (\$mill) 68 68 68 674 0 695 730 Net Profit (\$mill) 68															3.7%					
Total D	ebt \$788	13 mill 🛛 🛛	Due in 5 Y	rs \$2665)								522.3		+	1						4500
			.T Interes	at \$256 m	uN.				1								1				4.0%
eases	Uncapi	talized A	nnual ren	tals \$2 m	ell.	48.4%	46.1%	49.7%	9.4%	51 5%	47.8%	52 3%	50.6%	53 5%	52.9%	4.0%	55.0%		rm Debt F		6.0% 56.0%
						48.4%	50.8%	47 5%	50 0%	46 1%	49.8%	45 7%	47 6%	44 9%	47 1%	45.0%	45.0%		n Equity I		44.0%
		5-12/21 \$1		Oblig \$12	251 mill	6476.6 7838 0	6461.0 7147.3	7257.2	7446 3 8970.2	8377.6	8392.8 10798	10032	10938	12657 14336	12725 14987	14000	14550 17000		pıtal (\$mi t (\$mill)	II)	17100 19900
Pfd Sto	ck None					6.3%	7.0%	6.5%	6.3%	5.6%	6.7%	6.3%	6.3%	5.9%	6.3%	6.0%	6.0%	Return o	n Total C		6.0%
Commo as of 1/		250,478,	,681 shs			10.1% 10.3%	11.0% 11.3%	10.8%	10.0%	9.5%	10.6%	10.9%	10.5%	10.6%	11.3%	11.0%	11.0%		on Shr. Ec on Com E		11.0% 11.0%
		\$15 billio	on (Large	Cap)		3.9%	4 9%	4.6%	3.6%	2.8%	4.0%	4.4%	4,2%	4.2%	4.3%	4.0%	4.0%	Retaine	to Com	Eq	4.0%
ELECTI	RIC OPE	RATING	STATIST 2019	ICS 2020	2021	64%	57%	60%	66%	72%	64%	62%	61%	62%	62%	62%	62%	J	s to Net I		64%
% Change I Avn. Indust	Retail Sales (Use (MWH)	KWH)	-22	-2 3 11134	+3 7 NA						rmerly in merger o					. 8%, oti 16%, oti					
Avğ, Indust Capacity at	Revs oer K	WH (¢)	6 98 NA	7 55 NA	7 64 NA						ilies elect in Wisco					rted dep Presiden					
Peak Load,	Summer (Ma Sector (%)	٧}	5626 NA	5496 NA	5486 NA	Minnes	ota. Elec	tric reve	nue by s	tate: WI,	43%; IA	56%. N	1N, 1%.	Address	- 4902 N	Biltmoi	re Lane,	Madison	Wiscons	sin 5371	
% Change (Customers (y	r end)	+.6	+ 6	+ 8						nercial,					11. Interr					
Fixed Charg		0 Deet	265	251	259 ' 19-'2 1						subs: ctric			appr	oval	nergy from	the	regu	lators	s in '	Wis-
of change		10 Yrs.		s, to'	25-'27						rt of 2 Is grai					nd Ic roject					
Revent Cash I	"low"	-1 0 7.0	% 75	5% t	35% 5.0%						ty and		-	WPL	expe	cts a	ruling	g on i	ts req	uest	for a
Earning	ds	7 0 6.5 5 5	% 8.0 % 6.0	5% (45% 6.0%						c incu nt agr			certit	ficate	of ne solar	ed to	add u	ip to 4	414 n	nega-
Book V			VENUES (4 0% Full						ted in			plans	s to a	sk the	e Wis	consir	com	nissio	on to
Cal- endar			Sep.30		Year						lowed nd the					p to a apacit					
2019 2020	987.2 915 7	790.2 763 1	990.2 920.0	880.1 817 2	3647.7 3416 0	equit	ty rat	tio wa	as bo	osted	from	52.59	‰_to	expe	cts a	decis	ion 11	n the	secor	nd ha	lf of
2021	901	817	1024	927	3669.0						operat are a					s prog Ir cap					
2022 2023	1000 1050	850 875	1075 1125	975 1000	3900 4050						ROE			stora	.ge.	-	-				·
Cal-		RNINGS P	ER SHARE		Full						a kej xpect					d of c he fii					
endar 2019	Mar.31 .53	Jun.30 40	Sep.30 .94	Dec.31 46	Year 2.33	Our	estin	năte i	s wit	hın A	dliant	Ene	rgy's	had	signa	led th	nat th	ne inc	rease	woul	d be
2020	72	.54	.94	.26	2 47						81 a s prev) a sh coccui	are (6 red	5.2%)	annu	ally, a	nd th	1S 1S
2021 2022	.68 .70	.57 .57	1.02 1.05	35 .43	2.63 2.75	ance	of \$	2.65-	32.79	thanl	cs to	incre	ased	Allia	int E	nerg					
2023	.75	.60	1.10	.45	2.90	capit	al sp	endin	g on	solar	pow	er, w ider	hich			he di					
Cal- QUARTERLY DIVIDENDS PAID = + Full will be recovered through a rider (sur- endar Mar.31 Jun.30 Sen.30 Dec.31 Year charge) on customers' bills out for the next 18 months, and with the																					
0119 295 295 295 295 195 We look for further profit growth in recent quotation well within our 2025-																					
2019 355 355 355 142 2023. The additions of renewable capacity 2027 larger that time frame is uppro-																					
2021	.38 .4025			.38 4025	1.52	prod	uce ar	n incr	ease c	of 5%,	which	ı is w	ıthin	tacul	ar.						
2022	4275		ecurring l	00000 14	1 1.		-				% ann					bbas,	mpany's	Financi		$\frac{h}{h}$	
5, 12, 8	3¢. '20 8	21 EP	S don't s	um due	to plan	avail † S	Sharehok	ler invest	ment pla	n avail.	in '20, vi	arious, ir	: Win מי	22 10%;	earned	on Sto	ock's Pri	ce Stabil	ity -		A 95
unding	Next ea	urnings re	port due	early Ma	y. (C) 5 \$7.9	nci, detei 1/ch (D)	rrea chai	rges in '	∠i \$198 ∉enlit (≣	U IIII U	avg com	⊢eq., 21 n_Above	11.3%.	Regulato	verade	ie' Pri Fai	ce Grow	th Persis redictab			65 95

rounding Next earnings report due early May. (C) Incl. deferred charges In '21 \$1980 mill, avg com eq., '21 \$11.3%. Regulatory Climate (C) Price Growth Persistence 65 (B) Drividends historically paid in mid-Feb, \$7.91/sh (D) In millions, adj. for split. (E) Rate Wisconsin Above Average, Iowa, Average. Iowa, Average. (Second Persistence 95 © 2022 Value Line, Inc. All rights reserved. Facula material is obtained from sources beleved to be relable and is provided without warantes of any kind THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN This publication is strictly for subscriber's own, non-commercial, internal use No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or markeling any printed or electronic publication, service or product.

																		E		DWD- 3 of 1	
AM	ERE	NNY	SE-AEE				R P	ecent Rice	85.9	5 P/E Rati	o 21.	1 (Trailli Medi	ng: 22.4) an: 19.0)	RELATIV P/E RATI	5 1.1	8 DIV D YLD	2.8	%	ALU LINE		<u> </u>
TIMELI SAFET		4 Lowered 1 Raised 9		High: Low.	25.5	35 3 28 4	37 3	48.1 35.2	46 8 37.3	54 1 41.5	64 9 51 4	70 9 51 9	80 9 63 1	87 7 58.7	90 8 69.8	89.5 81 8			Targe 2025	Price	Rang 2027
TECHN		Lowered		0	64 x Divide	ends p sh iteresi Rate e Strength					ļ										160
	80 (1 00			Options'	Yes	e Strength ales recess									\nearrow						+120 +100
		get Price	-	Shaded									1.1.1.1.1.0	Hint A.	uuuu Ti	N ,					-80
Low-Hi \$75-\$10	-	lpoint (% (5%)	to Mid)				\sim			-		пы. ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,									+60 +50
		OJECTIO	ONS		1		فيتبريني	j.umi.	Harry T				<u>~</u>								40
	Price	Gain	nn'i Total Return	10101 ⁰⁰⁰					-									l			L ₂₀
High Low	100 (80	+15%) (-5%)	7% 2%				···*,,.,	····		•••••	······				سنسند	 		« то:	I T. RETUR		15
Institu	tional 202021	Decisio 302021	ns 402021		1		{		}]					Ì			[/*10		L ARITH	
to Buy to Seli	273 226	248 246	308 227	Percen shares traded		1.1.1.1.1		uli	11 1.11	hulu			لي ا					1 yr 3 yr	25 4 29,4	15.1 61.1	F
	194886		198495 2009	2010	2011	2012	2013		2015	2016		2018	2019	2020	山山山 2021	2022	2023	5 yr © V∆1	79 1 JE LINE P	84.2	25.27
33 30	36.23	36.92	29.87	31.77	31 04	28.14	24.06	24.95	25 13	25.04	25.46	25.73	24.00	22.87	24.81	25.35	25.85	Revenue		00, 2201	27.7
6 02 2 66	6.76 2.98	6.44 2.88	6.06 2.78	6.33 2.77	5.87 2.47	5.87 2.41	5 25 2.10	5.77 2 40	6.08 2.38	6 59 2.68	6 80 2.77	7.64 3.32	7 83 3 35	8.08 3 50	8.89 3.84	9.35 4.10	9.90 4.35		low" per : s per sh /		11.75 5.2
2.54	2.54	2.54	1.54	1 54	1 56	1.60	1.60	1.61	1 66	1.72	1.78	1 85	1.92	2.00	2.20	2.36	2.52	Div'd De	cl'd per s	h ^B ∎	3.1
4.99 31.86	6.96 32.41	9 75 32,80	7.51 33.08	4.66 32.15	4.50 32.64	5 49 27.27	5.87 26.97	7.66 27.67	8.12 28.63	8.78 29.27	9.05 29.61	9.56 31.21	9 92 32,73	13.02 35.29	13.67 37.64	12.90 40.25	12.55 42.90	Cap'l Sp Book Va	ending p		13.0 51.5
206 60	208.30	212.30	237.40	240,40	242.60	242.63	242.63	242.63	242 63	242 63	242,63	244.50	246.20	253.30	257 70	262.50	267.00	Commo	n Shs Ou	ist'g D	280.0
19.4 1.05	17.4	14.2	9.3 .62	9.7 .62	11.9 .75	13.4 .85	16.5 .93	16 7 .88	17.5 .88	18.3 .96	20 6	18.3 99	22.1	22.2	21.4 1 14	Bold fig Value	ures are Line		'I P/E Rat P/E Ratic		17.1 .9
4.9%	4.9%	6 2%	6.0%	5.8%	5.3%	5.0%	4.6%	4.0%	4 0%	3.5%	3,1%	3.0%	2.6%	2.6%	2.7%	estin	ates		'l Div'd Y		3.4%
		CTURE a			0 mil	6828.0 589.0	5838.0 518 0	6053.0 593.0	6098.0 585.0	6076 0 659 0	6177 0 683 0	6291 0 821 0	5910 0 834.0	5794 0 877 0	6394 0 995 0	6650 1080	6900 1165	Revenue Net Prof		ł	780 150
LT Deb	t \$12562	mill. L ied. 3.8x)				36.9%	37.5%	38 9%	38 3%	36 7%	38.2%	22.4%	17 9%	15 0%	13.6%	12.0%	12.0%	income			12.0%
		s-12/21 \$5		Oblig \$54	(57 m)l	6.1% 49.5%	7.1%	57%	5.1% 49.3%	4.1%	5.6% 49.2%	6 9% 50.3%	5 8% 52 1%	5 5% 55 0%	6 0% 56 1%	5.0% 55.5%	5.0% 53.5%		% to Net I rm Debt F		4.0%
	ck \$129		Pfd Div'd	\$5 mill		49.4%	53.7%	51 7%	49 7%	51.3%	49 8%	48.8%	47.1%	44.3%	43.3%	44.0%	46.0%	Commo	n Equity F	Ratio	48.5%
stated v	al, rede	50 to \$5 5 em. \$102	176-\$110	0/sh , 487	7,508	13384 16096	12190 16205	12975 17424	13968 18799	13840 20113	14420	15632 22810	17116 24376	20158	22391 29261	23900 31250	24950 33125	Total Ca Net Plan	pital (\$mi t (\$mill)	II)	29600 3880
\$104 30	i/sh	6%, \$100	•	em, \$10	0-	6.0%	5.6%	5.8%	5.3%	6.0%	6.0%	6.4%	6 0%	5.3%	5.3%	5.5%	5.5%	Return o	n Total C		6.0%
Commo as of 1/		257,724,	,783 shs.			8.7% 8.8%	7 7% 7.8%	87% 87%	8.3% 8.3%	9.1% 9.2%	9.3% 9.4%	10.6% 10.7%	10 2%	9.7% 9.7%	10 1%	10.0%	10.0%		n Shr. Eq n Com E		10.5% 10.5%
		\$22 billio				3.0% 66%	1,9% 76%	2.9% 67%	2.5% 70%	3.3% 64%	3,4% 64%	4.8% 56%	4.4% 57%	4 2% 57%	4.4% 57%	4.5% 57%	4.5% 58%		l to Com s to Net F		4.5% 58%
		RATING	2019	2020	2021			L	prporation					L	L	coal, 73					
Avo Indust	Retail Sales (Use (MWH) Revs. oer K		-3 5 NA NA	-5.6 NA NA	+2 1 NA NA	through	i the mer	ger of U	nion Elec	tric and	CIPSCO	Has 1.2	milion	chased,	7% Fu	el costs. as 9,100	25% of	revenue	es '21 re	eported i	deprec
Capacity at	Peak (Mw) Summer (Mv		NA NA	NA NA	NA NA	and 81	3,000 ga	is custor	ners in III	inois. Di	scontinue	d nonre	gulated	Preside	nt & CEC	D Martin	J. Lyons	, Jr. Inc.	Missour	Addres	s' On
Annual Loa	Factor (%) Sustomers (y		NA NA	NA NA	NA NA				ion in '1 rcial, 34%							1901 Ch Tel. 31					
Fixed Charg	e Cov. (%)	· · ·	307	291	325				ved r							or yea					
ANNUA of change	L RATE	S Past 10 Yrs.	Pas 5 Yr		'19-'21 '25-'27				nmissi ed elec					creas	e witl	estime hin th	is ran	ge.	-		
Revenu "Cash l	ies	-2.5 3 0	% -11	0% 2	25%				ıd \$5 .rn on					Thei	e is a	a risk r. Th	to tl	he co eral l	mpan Energ	y's ea	arn-
Earning Dividen	S	3.0° 3 0'	%7. %4	5% (0%)	6.5% 7 0%	fied,	but t	he coi	mmon	equit	y rati	o for	elec-	tory	Com	missic	n (F.	ERC)	18 CC	onside	ring
Book V		1.0			6 5%		was se ebrua		52%. N 	iew ta	aritis	took e	ffect			al of : dder"					
Cal- endar	Mar.31	TERLY RE Jun.30	Sep.30		Full Year				likely ases in					elect	ric t	ransm annua	issior	ı. Th	is w	ould	cut
2019 2020	1556 1440	1379 1398	1659 1628	1316 1328	5910.0 5794 0	key	factor	. Als	o, gro	wth	in th	e util	ity's	share	e. The	e tim:	ing of	f FEF	lC's d	ecisio	n is
2021	1566	1472	1811	1545	6394.0				oost tł 's tra							Our on the					
2022 2023	1700 1750	1500 1550	1850 1950	1600 1650	6650 6900	and	electr	ic ope	eratior	is_in	Illino	is ope	rate	lowe	i ROF	E for t	ransn	nissior	1 of 10).52%.	
Cal- endar		RNINGS P Jun.30			Full Year				rate ents a							d of d he fii					
2019	.78	.72	1.47	.38	3 35				s rate. last							nare (
2020 2021	.59 .91	.98 80	1.47 1.65	.46 .48	3 50 3.84	shou	ld out	weigh	n the e	ffects	of hi	gher d	per-	grow	th. A	ll lik merei	n's ta	rget	for th	ie pā	yout
2022 2023	.90 .95	.85 .90	1.85 1.95	.50 .55	4.10 4.35				tenanc ares (5%-70° end of				re is	near
2023 Cal-		ERLY DIVI			Full	stick	ing w	ith ou	ır 202	2 esti	mate	of \$4.	10 a	The	divi	dend	yield	lof	this		
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year				withi: 3.95-\$		nagen	ient's	tar-			-qual ean.					
2018 2019	4575 .475	4575 .475	4575 475	.475 .495	1 85 1 92	We	expe	ct fu	rther	gro				the 1	next]	l8 mo	nths	and t	he 3-	to 5-	year
2020 2021	.495 .55	.495 .55	.495 .55	.515 .55	2.00 2.20	rate	relief	in Mi	ave a issouri	and	will c	ontini	ie to	with	n our	subp 2025	-2027	Targe	et Pric	e Ran	.ge.
2022	.59								e base							bbas,		F 1		h 11,	
) Dilute 0, (\$2.1	u EPS 1 9), '11, (Excl_nonr 32¢), '12,	rec gain , (S6 42),	(iosses): '17 (63¢	:), (B) Div'd	nv ds pai reinvest	u late Ma plan ava	ir , June, ail. (C) In	Sept, & I cl intang	Jec ■	'22 elec varies, in	& gas, n '21. gas,	one sper 9 67%, 4	earned or	⊾ electri) avg. co	c, CO m. Sto	mpany's ck's Pric	Financia ce Stabili	ai ⊃treng ity	ពា	A 100

o subscribe call 1-800-VAL	UELINE
Earnings Predictability	95
Price Growth Persistence	75
Stock's Price Stability	100

Exhibit DWD-3

(A) Diluted EPS Excl nonrec gan (losses): 10, (\$2 19), '11, (32¢), '12, (56 42), '17 (63¢), gain (loss) from discontinued ops...'13, (92¢), '15 21¢ Next earnings report due early May. © 2022 Value Line, Inc. All nghs reserved Facual material is obtained from sources believed to be reliable and is provided without warrantes of any kind HE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN This publication is strictly for subscriber's own, non-commercial, internal use No part of it may be reproduced, resold, stored or transmitted in any privided, electionic or other form, or used for generating or marketing any printed or elections publication, service or product.

١M	FRI	CAN	FLF	C P	WR.		FD	ecent Rice	90.6	5 P/E RATH	o 17.	9 (Trailin Media	ng: 18,3) an: 17,0)	RELATIVE P/E RATIO	1.0	O DIV'D YLD	3.6		ALUI		15
MELI				High [•] Low	417	45 4 37 0	516	63 2 45.8	65 4 52 3	71 3 56.8	781	81 1 62 7	96 2 72 3	105 0 65 1	91 5 74 8	91 7 84 2			Targe	Price	
AFET		Raised 3/		LEGE	NDS		<u> </u>		023	0.0	010	561	123	001	140	04 2			2025	2026	
		2 Lowered	3/11/22	1 · · · · R	67 x Divide vided by In elative Pric	terest Rate e Strength	-		<u> </u>						<u>/_``</u>	 1 .					\pm^{1}_{1}
	75 (1.00 :	= Markel) et Price	Dango	Options, Shaded	Yes area indici	ates recess	ion					· ·			ահերի	•					
ow-Hig	-	point (% t					\sim			11.11.14		11,11,4111	\leq	1							
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iai Loac nange C	Factor (%) ustomers (yi	-end)	NA + 3	NA +1,0	NA NA	23%; Ir	ndustrial,	18%, wh	nolesale,	10%, oth	er, 6%. S	old com	mercial	614-716	5-1000 Ir	iternet w	ww aep	com	_		
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23	1.30	1.25	1.75	1.05	5.35				enewa 1ird p									range. key f			
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DUK	EE	NER(VYSE-	DUK		P	RICE	05.0	6 P/E RATIO	o 19 .	6 (Traili Medi	ng: 27.1) an: 18.0)	RELATIVI P/E RATI		1 DIV'D YLD	3.8			Ξ	
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	.85 4 4%	1.04 5,2%	.89 6.2%	.81 5.7%	.87 5.2%	1.11 4.7%	.98 4.4%	.94 4.3%	.92 4,3%	1.12 4.3%	1.00 4.2%	1.05 4.5%	.94 4.2%	1.15 4 4%	1.05 3 9%	Value estim	Line	Relative Avg Ann	P/E Ratio		3.9
CAPITAL	STRUC	TURE as a	of 9/30/	/21		19624	24598	23925	23459	22743	23565	24521	25079	23868	24950	25650	26400	Revenue	s (\$mill)		288
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		81 billion (ATING ST	<u> </u>		{	.9% 82%	1.5% 78%	1.7% 76%	1,5% 79%	.6% 91%	1.2% 83%	1.0% 84%	2.4%	.4% 94%	1.5% 79%	2.5% 73%	2.5% 71%	Retained All Div'd			3. 6
Change Reta	ail Sales (Ki	2 NH)	2018 +3 9	2019 - 9	2020 -2 3 NA	BUSIN	SS: Du	ke Energ	y Corpora	ition is a	holdung a		for util-	resident	l al, 45%	comme	rcial, 28	%; indus	tnal, 139	%, other	r, 14 ^o
rg Indúsi Usi rg Indust Rei apacitv at Pea	vs ner KW	2 H (c)	2953 NA NA	2934 NA NA	NA NA NA	16 mil	gas cu	stomers	ustomers in OH, K has 25	Y, NC, 8	SC, and	TN Owr	ns inde-	purchas	ed, 19%	Fuel cos	sts. 27%	clear, 30% of revs '' airman, P	20 report	ed depre	ec. ra
pacity at Pea ak Load, Sun nual Load Fa	mmer (Mw) actor (%)	a.	NA NA +1 4	NA NA +1,5	NA NA NA	Saudi /	rabia A	cq'd Pro	gress En st int'i op	ergy 7/12	2; Piedme	ont Natu	ral Gas	Good	Inc DE	Addres	s 550	South Tr nternet: v	yon St,	Charlot	tté,
Change Cust ed Charge C			218	233	183	Duk	e Ene	ergy's	earn	ings	will l	ikely	ad-	ın F	lorida	at t	he sta	art of	the	year.	Tł
NNUAL I change (p	RATES	Past 10 Yrs.	Pas 5 Yrs	s. to '	'18-'20 25-'27	paris	on sh	ouldn	antly 't be o	lifficu	lt, esp	pecial	ly in	rate	relief	in Oł	nio. W	from e esti	mate	a bot	ton
evenues Cash Flo	s ow"	.5% 3 5% 2 5%	-1 0 4 5 1,5)% 2 % 5	2.0% 5.5% 7.0%	an 🖇	0.18 - 3	a-shar	er, wh e ch <i>a</i>	rge f	or a	work	force	annu	al tar	get of	5%-7				
amings widends bok Valu	s ue	3 0% 2 0%	3.5 1.0	5% 2	2.0%	from	incre	eased	2021 rates	A \$6	67 mi	llion	hıke	in	Nort	h C	aroli	egulat na.	This	invo	olve
		ERLY REVE Jun.30 Se			Full Year	Pied	nont	Natui	lorida al Ga	s rece	erved a	a \$67_	mil-	tizati	ion fo	r coa	l-fired	temak asse	ts tha	at wil	11 ł
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al-	QUARTE	RLY DIVIDE	NDS PA	ID B =	Fuli	An	electi	ric ra	ate c seekir					tĥe c	ooper	ation	agree:	ment k ha	expire	s.	
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022	.965 .985		985	985	3 90	phas	e of n	nultiy	ear ra	te rel:	ief (\$4	9 mil	lion)	Paul	E. De	ebbas,	CFA	Fe	ebruar	ry 11,	
		nonrec.		140 20			(0) 0	لمبحد ملدا	mid-Mar.,					110 0.00	1.0		mpany's				

Exhibit DWD-3

Page 6 of 15 EDISON INTERNAT'L NYSE-EIX 65.64 P/E RATIO 34.0 (Trailing: 32.2) RELATIVE 1.78 VLD RECENT VALUE 4.3% LINE 39 4 30 4 41 6 32 6 High 48 0 39 6 54 2 44 3 68 7 44 7 69.6 55.2 71 0 45.5 Target Price Range 2024 | 2025 | 2026 TIMELINESS 3 Raised 9/17/21 78.7 83.4 62 7 76 4 53 4 78 9 43 6 68 6 53.9 58.0 Low 3 Lowered 11/23/18 LEGENDS 0.70 x Dividends p sh divided by Interest Ra Relative Price Strengtl Options Yes SAFFTY TECHNICAL 2 Raised 1/21/22 200 .160 BETA 95 (1.00 = Market) area indicates recess 18-Month Target Price Range 100 Low-High Midpoint (% to Mid) - 80 ditter. tinnt¹ i litati 60 יווווין ערוקליק \$53-887 \$70 (5%) 2024-26 PROJECTIONS .40 Ann'l Total Return . 30 Gain Price ••••• (+70%) (+5%) 17% High Low 110 70 20 % TOT, RETURN 12/21 ٠... Institutional Decisions THIS VL ARITH INDEX 3Q2021 1Q2021 202021 Percent 30 13.6 36.3 15.2 25 4 84.2 88 5 289 320 298 20 10 to Bu shares to Sel 261 249 263 the fille the second तित्तकांसित्तवम 110001111 Hid's(000) 330900 330984 33216 2009 © VALUE LINE PUB, LLC 24-26 2005 2006 2010 2022 2007 2008 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 36.38 38.74 40.25 43.31 37.98 38.09 39.16 36.41 38.61 41 17 35.37 36.43 37.81 38.85 34 11 35.83 38.95 39.25 Revenues per sh 44.25 6 99 7.25 7,60 8.08 7,96 8.41 9.03 9.63 8 80 9.95 10.35 10.43 11.03 4,69 9.15 7.94 7.95 10.95 "Cash Flow" per sh 12.50 3.34 3.28 3.32 3 68 3 24 3.35 3.23 4.55 3 78 4.33 4.15 3.94 4.51 d1.26 3.98 1.72 1.60 4.50 Earnings per sh A 5.25 1.02 1.10 1.18 1.23 1.25 1.27 1.29 1.31 1.37 1.48 1.73 1.98 2.23 2.43 2.48 2.58 2.69 2.84 Div'd Decl'd per sh B = 3.35 17.50 5 73 7 78 8.67 8.6 10.07 13.94 14 76 12 73 11 99 12.9 11 46 11 75 13.84 13 47 14 4 14 30 15.90 Cap'l Spending per sh 38.45 Book Value per sh C 32.44 28.95 30 50 34.89 36.82 35.82 32,10 37 08 36 40 23.66 25 92 29.21 30.20 30.86 33 64 36.75 20.30 43.75 390.00 Common Shs Outst'g 325 81 325 81 325 81 325.81 325.81 325.81 325.81 325 81 361.99 325.81 325.81 325.81 325.81 325.81 325.81 378.91 385.00 390.00 16.0 12.4 9.7 10.3 11.8 9 12.7 13.0 14.8 17.9 17.2 16.7 34.9 37.1 Avg Ann'l P/F Batio 117 13.0 170 Relative P/F Batio 62 70 85 75 65 66 74 62 71 68 79 Q2 87 80 1 70 2 00 95 . . 2.6% 2.6% 22% 2.7% 4 0% 3.7% 34% 3.0% 2.8% 2.6% 2.8% 2.8% 2.9% 3.8% 3.7% 4.3% 4 5% Avg Ann'l Div'd Yield 3.7% CAPITAL STRUCTURE as of 9/30/21 12581 13413 12657 15000 15300 Revenues (\$mill) 12760 11862 11524 11869 12320 12347 13578 17250 Total Debt \$27160 mill Due in 5 Yrs \$11170 mill. 11120 1594.0 1344.0 1539.0 1480 0 1422 0 1603.0 d290.0 1477 0 775 0 770 1915 Net Profit (\$mill) 2200 LT Debt \$23342 mill LT Interest \$948 mill 25 7% 14.3% 25 2% 22.4% 6 6% 111% 5 0% 5.0% 5.0% Income Tax Rate 5.0% (LT interest earned 1 5x) 14.8% 8 5% 78% 5 8% 8.0% 6 8% 7 2% 11.1% 22.5% 23.0% 9.0% AFUDC % to Net Profit 8.0% Leases, Uncapitalized Annual rentals \$39 mill Long-Term Debt Ratio 45 2% 53 6% 53.5% 55 3% 45 7% 44 1% 45 0% 41 8% 45 6% 55 2% 54.5% 55.0% 58.0% Pension Assets-12/20 \$4171 mill. Oblig \$4476 mill 40.6% 46 2% 46.2% 47.2% 46.7% 49 2% 45 8% 38.3% 39.9% 39 5% 35.5% 35.5% Common Equity Ratio 34.0% Pfd Stock \$3136 mill. Pfd Div'd \$172 mill 24773 20422 21516 23216 24352 24362 25506 27284 33360 35581 39475 42025 Total Capital (\$mill) 50000 350,000 sh. 6 25%, \$1000 liq value, 638,020 sh 32116 30273 30455 32981 35085 37000 39050 41348 44285 47839 50900 54575 Net Plant (\$mill) 64900 5.0%-5 75%, \$2500 kg value; 1,250,000 sh 5 375%, \$1000 kg value, all cumulative Return on Total Cap'i 8.9% 7.3% 7.7% 7.1% 6.0% 6.9% 7.3% 5 6% 3.4% 3.0% 5.5% 1% 5.5% 10.0% 14.2% 11.5% 10.0% 11.6% NMF 9.5% 4.5% 10.0% Beturn on Shr. Faulty 11.9% 111% 4.9% 10 5% Common Stock 379,908,256 shs NMF 11.0% Return on Com Equity E as of 10/26/21 10.5% 15.9% 12.5% 13.0% 12.0% 10.8% 12.7% 10.2% 4 6% 4.5% 12.0% MARKET CAP: \$25 billion (Large Cap) NM NMF 6.3% 11.4% 81% 8.8% 7 2% 5.6% 6.6% NMF 41% 4.0% Retained to Com Eq 4.5% NMF NMF 66% All Divids to Net Prot 43% 32% 40% 37% 44% 53% 52% 63% NMF 67% ELECTRIC OPERATING STATISTICS 2020 2018 2019 dential 42%; commercial, 40%; industrial, 4%; other, 14%. Genera-% Change Retail Sales (KWH) Avg Indust Use (MWH) Avg Indust Revs. oer KWH (¢) Capacity at Peak (Mw) Peak Load, Summer (Mw) 2019 -2 7 657 NA 22009 BUSINESS: Edison International (formerly SCECorp) is a holding + 7 589 NA 667 NA NA 23766 company for Southern California Edison Company (SCE), which ting sources nuclear, 8%; gas, 5%; hydro, 4%, purchased, 83% Fuel costs 36% of revs '20 reported depr rate 3 6% Has 13,400 supplies electricity to 5.2 mill customers in a 50,000-sq -mi area in NA 23133 central, coastal, & southern CA (excl Los Angeles & San Diego). empls Chairman: William P. Sullivan. Pres. & CEO: Pedro J. Piz-Edison Energy is an energy svcs co. Disc Edison Mission Energy (independent power producer) in 12 Elec rev breakdown resizaro. Inc CA Address 2244 Walnut Grove Ave., P O. Box 976, 48 0 +.6 49 6 46 7 +.6 Annual Load Factor (%) Rosemead, CA 91770 Tel. 626-302-2222. Web www.edison.com % Change Customers (yr end) Edison International and its Southern no surprise. NMF NMF 172 Fixed Charge Cov (%) California Edison utility subsidiary have increased the estimated liability A cost-of-capital application is pend-ANNUAL RATES Est'd '18-'20 Past ing. Based on a provision in the current 10 Yrs 5 Yrs. of change (per sh) to '24-'26 -1 0% -5 5% -18.5% 10.5% 1.5% stemming from wildfires and mud-slides in 2017 and 2018. Previously, this cost-of-capital mechanism, SCE's allowed return on equity for 2022 will be reduced -1.0% -1 0% -8.0% 7.0% 1 5% 3.5% 9.5% NMF Revenues Cash Flow Earnings Dividends from 10.3% to 9 72%, reducing revenues by figure was \$6.2 billion, with \$1.4 billion 5.0% 3.5% yet to be resolved. Now, the utility has raised this to \$7.5 billion, with \$2.2 billion \$179 million However, the utility argues Book Value that the provision should not apply due to QUARTERLY REVENUES (S mill.) Cal-Full yet to be resolved Accordingly, the compathe interest-rate cuts stemming from the Mar.31 Jun.30 Sep.30 Dec.3 endar Year ny took an aftertax charge of \$899 million government's reaction to the coronavirus. 2018 2564 2815 4269 3009 12657 (\$2.37 a share) against September-quarter results, part of which is for fines and penalties stemming from the wildfires. As SCE has two counterproposals, one of 2812 12347 2019 2824 3741 2970 which would result in no revenue loss and 2020 2790 2987 4644 3157 13578 the other that would lower revenues by 2021 2960 3315 5299 3426 15000 \$50 million. When this matter will be reis the case with previous charges, we in-2022 3100 3450 5300 3450 15300 cluded this in our earnings presentation. solved is unknown. EARNINGS PER SHARE A Fuli Year Cal-Thus, we slashed our 2021 share-earnings The board of directors raised the divi-Mar.31 Jun.30 Sep.30 Dec.31 endar estimate from \$4 15 to \$1.60. We are not dend. The move occurred in early Decemd4 49 d1 26 2018 82 84 1.57 ber, effective with the payment in Janu-ary. The increase was \$0 15 a share (5.7%) assuming any more charges in our 2022 2019 64 1.57 1.35 .45 3.98 estimate of \$4 50 a share. 2020 .50 85 d 76 1.13 172 The utility has increased its capital annually. 1.60 2021 .68 84 d.90 .98 spending plans. SCE intends to add some \$900 million of battery storage in 2022. This will probably necessitate some This stock has an above-average divi-2022 .80 1.05 1.60 1.05 4.50 dend yield, even for a utility. This QUARTERLY DIVIDENDS PAID # = Full Calreflects the wildfire-related uncertainties endar Mar.31 Jun.30 Sep.30 Dec.31 Year debt and equity issuances The amount, timing, and form of the new equity are to that the company faces. Total return po-tential is unspectacular for the next 18 2018 .605 605 605 605 2.42 6125 6125 6125 2 45 6125 2019 be determined. Note that SCE issued \$2 months but decent for the 3- to 5-year pe-2.55 2020 .6375 .6375 .6375 .6375 billion of preferred equity last year, so adriod. .6625 2.65 2021 .6625 ,6625 .6625 ditional preferred issuances would come as Paul E. Debbas, CFA January 21, 2022 2022 .70 Company's Financial Strength B++

(A) DII. EPS Excl nonrec gains (losses)⁻¹09, ¹13, 116, ¹14, 57¢; ¹15, 11c; ¹18, 10¢, ¹19 EPS (C) Incl defd chgs in ¹20 \$18 79/sh. (D) In (64¢); ¹10, 54¢, ¹11, (\$3 33), ¹13, (\$1 12), ¹15, ¹don't sum due to change in shs. Next earnings (\$1 18); ¹17, (\$1.37), ¹18, (15¢); ¹19, (21¢); ¹20, ¹report due late Feb (B) Div'ds paid late Jan, ¹corm, eq in ¹20 10 3%, earned on avg com 25¢; gains (loss) from disc ops. ¹2, (\$511), ¹Apr, July, & Oct = Div'd reinv. plan avail, leq, ¹20 4.7%. Regulatory Climate Average © 2022 Value Line Inc. All rights reserved Factual material is obtained from sources betweed to be reliable and is provided without warranties of any kind THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERFORS OR OMISSIONS HEREIN. This publication is sticly for subscriber's own, non-commercial, internal use, No part of it may be reproduced, resold, stored or transmitted and printed, electoric or other form, or used for generating printed or electoric publications, sources produced, resold, stored or transmitted and printed, electoric or other form, or used for generating printed or electoric publications, sources produced, resold.

Exhibit DWD-3

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O	blig \$840		21432	22109	22842	22714	22777	22528	24602	27557	32386	36733	38025	40175	Total Capital (\$mi		47
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ommon Stock 203,027,662 shs		1/22	11 6%	9 2%	10.4%	11.2%	15.2%	11 7%	12.2%	12 1%	12,7%	119%	10.5%	10.5%	Return on Com E	quity E	11.
ARKET CAP: \$21 billion (Large			5 2%	3 0% 68%	4.4% 58%	4.8%	7.7%	3,9% 68%	4.9% 61%	5.2% 58%	5.9% 55%	5.2% 57%	3.5% 65%	4.0% 64%	Retained to Com All Div'ds to Net F		4.
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(A) Diluted EPS Excl nonrec. tosses '12, toncally paid in early Mar, June, Sept, & Dec Toase. Net original cost, Allowed ROE Company's Financial Strength B++ \$126 '13, \$1.14, '14, 56e, '15, \$69, '16, 'b' Sep. 'd' billity billity

Exhibit DWD-3 _

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due early May (B) Dividends paid in mid- (D) In millions (E) Rate base Original cost 1/21 9 8%. Regulatory Climate Average. March, June, September, and December - depreciated. Rate allowed on common equity 1/21 9 8%. Regulatory Climate Average. © 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 FUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product

Exhibit DWD-3

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Exhibit DWD-3 Page 10 of 15 IDACORP, INC. NYSE-IDA RECENT 112.66 P/E RATIO 23.3 (Trailing: 22.8) RELATIVE 1.22 VLD VALUE DIV D 2.7% LINE High: Low. 37.8 54 7 43 1 70 1 50 2 70 5 55 4 83.4 65 0 100.0 77 5 102 4 79 6 114 0 89.3 TIMELINESS 4 Lowered 8/13/21 42 7 33 9 45 7 113 6 69.1 113 8 85 3 Target Price Range 2024 | 2025 | 2026 30 0 LEGENDS — 0 70 x Dividends p sh divided by Interest Rate . Relative Price Strength Options: Yes SAFETY 1 Raised 1/22/21 TECHNICAL 3 Raised 1/7/22 200 .160 BETA ,80 (1 00 = Market) Shaded area indicates recession 18-Month Target Price Range • 100 1 الر السينين 80 Low-High Midpoint (% to Mid) in in in the fillen and 60 50 \$92-\$140 \$116 (5%) - Int 2024-26 PROJECTIONS W.W .40 ٠nt Ann'i Total Return .30 Gain Price (+5%) (-10%) High Low 5% Nil 120 100 .20 % TOT, RETURN 12/21 Institutional*Decisions THIS STOCK VL ARITH INDEX 102021 202021 3Q2021 Percent 21 4 31.4 60 0 25 4 84,2 88 5 to Buy to Sefl 145 163 shares 10 5 183 FIFU 156 186 145 Hid's(000) 39645 39928 3986 2009 © VALUE LINE PUB. 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Equity 9.5% as of 10/22/21 Return on Com Equity 9.6% 9.9% 9.9% 9.5% 9.4% 9.4% 9.3% 9.5% 9.5% 10.1% 9.2% 9.6% 9.5% MARKET CAP: \$5.7 billion (Large Cap) 3.5% 6.5% 57% 5.6% 5 4% 4 8% 4.3% 44% 4 4% 4 2% 3.9% 4.0% Retained to Com En 35% 60% All Div'ds to Net Prof 36% 41% 43% 46% 50% 53% 53% 54% 56% 58% 59% 64% ELECTRIC OPERATING STATISTICS 2019 2018 2020 BUSINESS: IDACORP, Inc is a holding company for Idaho Power 14%; irrigation, 12%, other, 10% Generating sources: hydro, 39%; % Change Retail Sales (KWH) Avg Indust. Use (MWH) Avg. Indust Revs oer KWH (c) Capacity at Peak (Mw) Peak Load, Summer (Mw) +2 0 NA - 3 NA 5 32 NA 3242 NA +2 5 coal, 21%; gas, 12%; purchased, 28% Fuel costs 32% of reve-TIA. Company, a regulated electric utility that serves 583,000 customers. 5.64 NA 3392 NA 5 38 NA 3392 NA +2 7 nues '20 reported depreciation rate 2 9% Has 1,900 employees throughout a 24,000-square-mile area in southern Idaho and eastern Oregon (population 12 million). Most of the company's reve-Chairman Richard J Dahl President & CEO Lisa Grow Incornues are derived from the Idaho portion of its service area. Reve-nue breakdown: residential, 42%; commercial, 22%; industrial, porated Idaho, Address 1221 W, Idaho St., Boise, Idaho 83702 NA +2 3 Annual Load Factor (% Telephone: 208-388-2200 Internet www.idacorpinc.com % Change Customers (yr-end) The year that just ended was a good one for IDACORP, and we look for further growth in 2022. We think earn-The utility's integrated resource plan 313 309 307 Fixed Charge Cov (%) (IRP) is indicative of its accelerating growth in demand. Filed m late 2021, the IRP projects 2.6% annual growth in ANNUAL RATES Past 10 Yrs. Est'd '18-'20 Past 5 Yrs. 1 5% 4.5% 4 0% 8 0% 4.5% to '24-'26 of change (per sh) ings in 2021 reached the upper end of the 2.5% 5.0% 6.0% 3.5% 3.5% 4.0% Revenues retail kilowatt-hour sales over the next five years The previous IRP, filed two Cash Flow" company's targeted range of \$4.80-\$4.90 a "Cash Fic Earnings share This would provide a 4% profit in-crease over the 2020 tally, which also was a solid year. The company's utility subsidi-Dividends 8.0% 65% 4.0% years earlier, projected 1.3% yearly growth Idaho Power has put out a request Book Value QUARTERLY REVENUES(\$ mill.) Full Calary, Idaho Power, is benefiting from strong customer growth. This metric was 2 9% for for proposals seeking 80 mw of dispatch-able capacity by mid-2023 in order to meet Mar.31 Jun.30 Sep.30 Dec.3 endar Year 2018 310.1 340.0 408.8 311.9 1370.8 the 12-month period that ended on Sepits expected peak demand. If the company 2019 350.3 316.9 386.3 292.9 1346 4 tember 30th. The utility is also seeing the winds up building this capacity, the utility might have to file a rate case. This has not 2020 291 0 318.8 425.3 315.6 1350.7 addition of large customers in its service 2021 3161 360.1 446 9 336.9 1460 area. A cobalt mine is expected to begin operations in mid-2022, Shell is adding a occurred since 2011 because Idaho Power 2022 330 355 465 350 1500 has been earning its allowed return on EARNINGS PER SHARE A Cal-Full renewable natural gas facility, and a data equity. Mar.31 Jun.30 Sep.30 Dec.31 Year endar center that is expected to use more than This high-quality but untimely stock 72 2018 1.23 2.02 .52 4.49 20 megawatts is on the drawing board. In has a lofty valuation for a utility. This .93 84 2019 1 05 1.78 4.61 addition, management is controlling operareflects the market's view of IDACORP's 2020 .74 1.19 2.02 .74 4.69 ting and maintenance expenses effectively consistency, financial health (Financial 2021 80 1.38 1 93 .70 4.90 O&M costs in 2021 probably approximated Strength rating A+), and solid dividend 2022 .95 1.25 2.10 .80 5.10 the 2020 level, even in the face of inflagrowth prospects The dividend yield is QUARTERLY DIVIDENDS PAID 8 = 1 Cal-Full nearly a percentage point below the utility average The equity does not stand out for tionary pressures All told, we think the Mar.31 Jun.30 Sep.30 Dec.31 Year endar bottom line will advance another 4%, to 2018 .59 59 .59 .63 2 4 0 \$5.10 a share, in 2022. IDACORP will likethe next 18 months. The recent quotation 2 56 2019 63 63 63 67 is well within our 3- to 5-year Target Price ly provide earnings guidance for this year 67 2.72 2020 .67 67 71

Range, so total return potential is low Paul E. Debbas, CFA January 21, sults in mid-February January 21, 2022 2022 (A) Diluted EPS Excl nonrecurring gain (loss): Feb, May, Aug, and Nov ● Dividend reinvest- (E) Rate base: Net original cost Rate allowed (05 (24c), '06, 17c, '19 earnings don't sum due to rounding Next earnings report due mid-pebruary (B) Dividends historically paid in late \$1495 5 milt, \$26.31/sh (D) In millions, Climate: Above Average. Company's Financial Strength A4 Stock's Price Stability Price Growth Persistence 100 70 Earnings Predictability 100 To subscribe call 1-800-VALUELINE

when the company reports its financial re-

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NUAL RATESPastEast 16 16-20 venuesSon is the equity issuances the company made in 2021 and expects to make in 2022. NorthWestern issued \$200 million 	ed Cha	ge Cov (%	6)		275	284	237															line	wit
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algement expects to settle this year. This is ar Mar.31 Jun.30 Sep.30 Dec.31until 2023, however The agement expects to settle this year. This is being done to finance the company's capi- tal budget and strengthen its balance sheet. The dilutive effect of the additional sheet. The dilutive effect of the additional to 0.25 in 2022. Thus, we have reduced our share net estimate is within NorthWestern's to \$3.35. Cur re- vised estimate is within NorthWestern's to \$3.35. 1.06 1.16until 2023, the were the utility has not obtained a cert to add the state construction and raised the cost of the project181.1861561.063.06140.04 Aff 12 MVDENDS PAID = full tal Mar.31 Jun.30 Sep.30 Dec.31Full Year185555552.2018				40% 55%	35	5%	20%																
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19 384.2 270.7 274.8 328.2 125.9 Sheet. The diffutive effect of the additional about \$0.25 in 2022. In our October report, about \$0.25 in 2022. In our October report, in 2022 Thus, we have reduced our share- in 2022 Thus, we have reduced our share- in 2022 Thus, we have reduced our share- vised estimate is within NorthWestern's long-term the state commission b reliminary guidance of \$3.20-\$3.40.South Dakota is expected to begin CO. mercial operation soon at a cost of \$275 million. No that the utility has not obtained a certi- tate of need from the state commission b cause this would have delayed the start construction and raised the cost of to project181.18.61.66.1.06.60 <td>dar</td> <td>f</td> <td></td>	dar	f																					
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The matrix marximate is writin NorthWestern's is de estimate is writin NorthWestern's preliminary guidance of \$3.20-\$3.40.that the utility has not obtained a certicate of need from the state commission I cate of need from the state commission I cates this would have delayed the start cause this would have delayed the start cause this would have delayed the start 	121							we h	ad no	t ant	icipate	ed an	equit	y issu	ance	mw	of gas	-fired	gene	ration	in M	lontar	na l
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191.44.49421.183.53preliminary guidance of \$3.20-\$3.40.cause this would have delayed the start201.0043.581.063.66The reduced earnings expectationconstruction and raised the cost of t211.2472681.013.65september of \$3.20-\$3.40.construction and raised the cost of t221.15.50.601.103.35NorthWestern's target for the payout ratiois 60% -70% However, the payout ratiosightly in 2021. We think this is due14Mar.31Jun.30Sep.30Dec.31Yearwill be above this range this year, basedslightly in 2021. We think this is due18.55.55.55.5752.30nate company's guidance. Managementsuggested that the disbursement will bethe deceleration of earnings growth. T19.575.575.575.20.2020.60.60.602.40estimate an increase to \$2.52 a shareturn potential to 2024-2026 is respectabl21.62.62.62.62.64.65.06.06.0621.66.60.60.60.60.07%Howestern's long-term goal is.16%, NorthWestern's long-term goal is.16%, NorthWestern's long-term goal is.61% in n'19 (elec.)Company's Financial Strength22.66.60.60.60.60.60.60.60.60.60.60.60.60.60.60.60.60.60<	dar 18					-		vised	l esti:	mate	is wi	thin	North	Weste		cate	of nee	ed from	m the	state	comr	nissio	n b
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Inter Mar.31 Jun.30 Sep.30 Dec.31 Year Iar Mar.31 Jun.30 Sep.30 Dec.31 Year 18 .55 .55 .55 .55 .52 .20 19 .575 .575 .575 .575 .575 .575 .575 .575 .575 .575 .20 .20 .00 .60	22							Nort	hWest	ern's	target	t for t	he pa	yout 1	ratio	The	price						
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22 (1.6%). NorthWestern's long-term goal is Paul E. Debbas, CFA January 21, 20 Diluted EPS Excl. gain (loss) on disc ops: early Feb (B) Div/ds historically paid in late allowed on com eq in MT in '19 (elec.). Company's Financial Strength B. (6¢), '06, 1¢, nonrec. gains. '12, 39¢ net; Mar., June, Sept. & Dec ■ Div/d reinvest. plan 9.65%; in '17 (gas) 9.55%, in SD in '15 none Stock's Price Stability)20	.60)	60	.60	.60	2.40																
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Exhibit DWD-3

GE ENERGY C)	_	Ŗ	ecent Rice	37.5	F P/E	. 15) (Trailin	ng: 16,0	RELATIV		C DIV'D	4.4	0/	/ALU		0
		28.6		40 0	RICE 39.3	·····	34.2	37.4	41 8	an: 17.0) 45 8	P/E RATI 46 4	0 V.0 38 6) YLD 38 5	4.4	1/0	LINE		
MELINESS 4 Lowered 12/17/21 AFETY 2 Lowered 12/18/15	Low	20 3	25 1	27 7	32,8	36 5 24 2	23.4	32.6	29 6	38.0	23.0	29.2	35.2				t Price 2026	
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TA 1 05 (1 00 = Market)	2-tor-1 st	olut 7/13	e Strength												<u> </u>			+
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w-High Midpoint (% to Mid)											/	<u>```</u>	`.					
7-\$43 \$35 (-5%)				adul.	լուսոր			H.T.T.		,			•					+
2025-27 PROJECTIONS Ann'l Total		June	1			1			111	~	400	ht						+-
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uy 165 188 230 ell 229 157 150	shares traded	12 - 6 †		+++++++++++++++++++++++++++++++++++++++								<u>}</u>] 3 ýr	-1.0	15 1 61 1	~
s(000) 125366 126167 128749 06 2007 2008 2009	2010	2011	2012	2013	2014	2015	2016	2017		2019	2020	2021	2022	2023	5 yr. ©VAL	23 3 UE LINE P	84 2 UB. LLC	25
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		es per sh		1
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		low" per	(
.23 1.32 1.25 1.33 67 .68 70 71	1.50 .73	1.73	1 79 .80	1 94 85	1.98 .95	1.69 1.05	1 69 1.16	1.92 1,27	2.12 1.40	2.24	2 08	2 36	2.50 1.66	2.65 1.70		s per sh cl'd per s		
2.67 3.04 4.01 4.37	4.36	6 48	5 85	4 99	2 86	2.74	3 3 1	4.13	2.87	3 18	3 25	3.89	4.75	4.75	Cap'l Sp	ending p	er sh	
3.79 9.16 10 14 10.52 2.40 183.60 187.00 194.00	11.73 195 20	13 06 196 20	14,00	15.30 198.50	16 27 199 40	16.66 199.70	17.24	19.28 199.70	20.06 199.70	20 69 200 10	18 15	20 27 200.10	21.10 200.10	22 05 200.10		fue per s		
1.40 183.60 187.00 194.00 3.7 13.8 12.4 10.8	195 20	196 20	15.2	196.50	18.3	17.7	199.70	18.3	16.5	19.0	16 2	14 3	Bold fig			n Shs Ou 1'I P/E Ra		2
.74 .73 .75 .72	.85	.90	.97	.99	.96	.89	.93	.92	.89	1.01	.83	.76	Value	Line	Relative	P/E Ratio	•	
0% 3.8% 45% 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%			<u> </u>	n'l Div'd Y	lield	
PITAL STRUCTURE as of 12/3 al Debt \$4983 3 mill Due in 5 \		6 9 mill	3671.2 355 0	2867.7 387 6	2453 1 395 8	2196.9 337 6	2259.2 338.2	2261 1 384.3	2270 3 425 5	2231 6	2122 3 415 9	3653 7 472 5	2800 500	3000 530		es (\$mill) lit (\$mill)		
Debt \$4496 4 mill LT Interes Interest earned 4.4x)	t \$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%		Tax Rate		1.
			27%	2 6%	17%	3.7%	6.4%	15.0%	8 3%	16%	1 6%	2.2%	2.0%	2.0%		% to Net		
ises, Uncapitalized Annual ren	tals \$5 7	mili	50 7% 49 3%	43 1% 56 9%	45.9% 54.1%	44 3% 55.7%	41 1% 58.9%	41 7% 58 3%	42 0% 58 0%	43 6% 56.4%	49 0% 51 0%	52 6% 47,4%	47.5%	53.0% 47.0%		rm Debt I n Equity I		5 4
ision Assets-12/21 \$486 0 mill		0.0	5615 8	5337 2	5999.7	59716	5849.6	6600.7	6902 0	7334 7	71262	8552 7	8020	9360	Total Ca	pital (\$m		1
Stock None	blig \$50)	2 9 1111	8344,8 7 7%	6672 8 8.6%	6979 9 7 8%	7322 4 6 9%	7696.2	8339 9 7 0%	8643.8	9044 6 7.1%	9374 6	9832.9 6,4%	10345 7.5%	10830 6.5%		nt (\$mill) on Total C	anl	1
mmon Stock 200,201,818 shs			12.8%	12.8%	12.2%	10 2%	9,8%	10 0%	10.6%	10.9%	11.5%	11.6%	12.0%	12.0%		on Shr. Ec		1
of 1/31/22	((nn)		12.8%	12.8%	12 2%	10 2%	98%	10 0%	10.6%	10.9%	11 5%	11.6%	12.0%	12.0%		on Com E		1
RKET CAP: \$7.5 billion (Large CTRIC OPERATING STATIST			7 2% 44%	7 3% 43%	6.5% 47%	4.0% 61%	3 3% 67%	3,5% 64%	3.8% 64%	3.6% 67%	2.8% 76%	3.6% 69%	4.0% 66%	4.5%		d to Com is to Net I		
2019	2020 -4 9	2021				y Corp i				L			nerating s	1	h			nd
ange Retail Sales (KWH) +1.1 Indust, Use (MWH) NA	NA	+2.6 NA	ma Gas	and Ele	ctric Con	npany (O	G&E), wł	Nch supp	lies elect	ricity to	purchas	ed, 48%	Fuel co	sts 58%	of rever	nues. '21	reported	l de
Indust Revs. oer KWH (c) 4 69 city at Peak (Mw) NA	4 40 NA	7 68 NA				klahoma) wholesa							ty) 2.6% Executive					
Lóad, Summer (Mw) 6817 al Load Factor (%) NA	6437 NA	NA NA				rship un							ess [.] 321					
ange Customers (yr·end) +1 0	+1.1	+1 4			·	ercial, 25							0321 Tel					
Charge Cov (%) 335 NUAL RATES Past Pas	326	336 '19-'21				utili case							s to i to re:					
ange (per sh) 10 Yrs. 5 Yr	s. to'	25-'27				Electri							ll be		ial an	d mie	ght no	st
sh Flow" 3.5% 4.9	5% 7	5.5% 7 0%				oased 3.4% -							until ings e		ates	requi	re an	16
dends 80% 8.	5% 3	65% 30%				seeki					plan	ation	. We	are	includ	ding e	equity	1
		4.5%				the p .nd as					Tran	sfer u	OGE ntil tl	e un	its ar	e sold	in En Mar	.er va
I- QUARTERLY REVENUES (ar Mar.31 Jun.30 Sep.30		Full Year	for a	perfo	rman	ce-bas	sed ra	temal	cing p	olan,	ment	; is gi	ving e	earnir	ngs gr	uidanc	e onl	y '
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0 4313 503.5 7021 1 1630.6 577.4 864.4		2122 3 3653 7				fect in				110 11	guida	ance f	or 202	22 is	\$1.87	-\$1.97	. The	s
2 600 650 900	650	2800				is pe a set							s econ owth					
3 650 700 950 1- EARNINGS PER SHARE		3000				a set crease							earni					
i- EARNINGS PER SHARE ar Mar.31 Jun.30 Sep.30		Full Year	the s	state's	form	ula r	ate pl	an T	he ut	ility	5%-7	% an	nually	/ Div	idend	hike	s will	1
9 .24 .50 125	.26	2 24				five- ts a de				UIIS			vth fo: is h					
0 .23 .51 1.04 1 .26 .56 1.26	30 .27	2.08 2.36	The	comp	any	wants	s to s	ell its	stak		want	s No	te tha	t the	steep	reven	ue de	cli
.2 .27 .60 1.33	.30	2.50				f er . O valued							year gas a					
3 .30 .65 1.40 I- QUARTERLY DIVIDENDS PA	.30 ND ^B ■	2.65 Full	$_{\mathrm{the}}$	maste	er lir	nited	parts	nershi	p, w	hich	throu	igh to	cust	omers	s, cau	sed a	big j	jw
ar Mar.31 Jun.30 Sep.30	Dec.31	Year	comp	leted	the a	acquis	ition	of En	able 1	Mid-	in th	e top	line ir	h the :	first q	uarte	r of 20	02
8 .3325 .3325 .3325	.365	1.36				s in D fterta:							k is ı divid					
9 365 .365 365 0 3875 .3875 3875	388 4025	1 48 1 57	lion	(\$1.3)	2 a s	hare)	on t	he tr	ansac	tion,	prosp	pects a	are be	low t	he me	edian t	for th	е
1 4025 .4025 4025	.41	1 62				<i>led</i> fro onrecu							n and ebbas,		3- to 5		perioc ch 11,	
2 .41 illuted EPS Excl. nonrecurring	naine	Novi	earnings												Financi			انک
	(8¢): '20.	histo	rically pa	d in late	Jan . Api	, July, &	Oct I				19 9 5			ck's Pri				
es): '15, (33¢), '17, \$1.18; '19, i 5), '21, \$1.32, gain on discont				a minute		N In State	formalli				com, eq.				th Persis			

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PORTLAND (GENER	<u>AL n'</u>	YSE-PO	R P	ecent Rice	53.1	7 P/E RATI	o 18.	9 (Traili Medi	ng: 20,8 an: 18.0)	RELATIVE P/E Ratio		9 PIV'D	3.4		ALU LINE		
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AFETY 2 Raised 10/2 ECHNICAL 3 Raised 1/7/2		ENDS 0.63 x Divid divided by li	ends p sh hterest Rate	,		 												-12
ETA 90 (1.00 = Market)	Options	divided by la Relative Pric Yes d area indic				[-96
8-Month Target Price R	ange		ales recess								ويتارين		<u></u> سىنىرىپ	•				
ow-High Midpoint (% to 33-860 \$47 (-15%)	Mid)						հորեր			1++11/11/1		2114	, II , II					40
2024-26 PROJECTION	s			المتخللان	n									<u> </u>				
Ann' Price Gain Ri	turn				<u> </u>													1
gh 65 (+20%) w 50 (-5%)	9% 2%				····.		·····		···········	*****					0 TOT	 T. RETUR		+1
stitutional Decisions	302021 Barca								1			1]		IN 12/21 /LARITH* INDEX	
Buy 165 157 Selí 149 142	142 share	s 14 		աստե					1.116.0	Honto In	նեսնես		Hallula		1 yr. 3 yr.	28 1 27.8	25 4 84.2	F
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4.75 4 64 5.21	4.71 4.07		4.96	5.15	4.93	6,08	5.37	5.78	6.16	6.65	6.97	6.80	7.50	7.85	"Cash F	low" per		9
1.02 1.14 2.33	1 39 1.31 .97 1.01		1.95	1 87 1.08	1.10	2 18	2 04	2 16 1.26	2 29 1.34	2.37 1.43	2.39 1.52	1.72 1.59	2.75 1.70	2.90 1.80		s per sh cl'd per s		:
4.08 5 94 7.28	6.12 9.25	1	3.98	4.01	8.40	12.87	6.73	6.57	5 77	6.67	6 78	8.76	8.05			ending p		
9.15 19.58 21.05 2.50 62.50 62.53	21.64 20.50 62.58 75.21		22.07	22.87 75 56	23.30	24.43	25.43 88.79	26 35 88,95	27.11 89.11	28.07 89.27	28.99 89 39	29.18 89.54	30.20 89.65	31.25 89.80		liue per s n Shs Ou		3
23.4 11.9	16.3 14.4		12.4	140	16.9	15.3	17.7	19.1	20.0	18.4	22.3	26.6	17.5			I'l P/E Ra		
1.26 63 2.5% 3.3%	.98 .96 4.3% 5.4%		78 4.4%	89 4 1%	95 3.7%	.81 3.3%	.89 3,3%	1.00 3.1%	1.01 2.9%	.99 3 3%	1.19 2.8%	1.36 3.5%	.95 3.5%			P/E Ratio 'I Div'd Y		3
PITAL STRUCTURE as		- L	1813 0	1805.0	1810.0	1900 0	1898 0	1923 0	2009 0	1991 0	2123 0	2145 0	2400		Revenue			2
	nterest \$128 i		147 0 28 3%	141 0 31 4%	137.0 23.2%	175.0	172 0 20 7%	193.0 20.6%	204 0 25 3%	212.0	214 0	155 0	245 11.0%	260 11.0%	Net Prof			11
l. \$128 mill finance lease interest earned 2.4x)	6		5 4%	7.1%	14 6%	33 7%	19.8%	16 6%	8 8%	8.0%	7.0%	15 5%	8.0%	7.0%	AFUDC	% to Net I		5
ases, Uncapitalized Ánn nsion Assets-12/20 \$753		nill	49 6%	47 1% 52 9%	51 3% 48 7%	52 7% 47 3%	47 8% 52 2%	48 4% 51 6%	50 1% 49,9%	46 5%	51.3% 48.7%	53 6% 46 4%	56.0% 44.0%	55.5% 44.5%		rm Debt i n Equity i		54 45
	Oblig \$1	010 mili	3298 0	3264.0	3735,0	4037.0	4329.0	4544.0	4842.0	4684.0	5323.0	5628.0	6125	6320	Total Ca	ipital (\$mi		-45
d Stock None			4285.0	4392.0 5 9%	4880.0 5.1%	5679.0 5.8%	6012.0 5.4%	6434.0 5 6%	6741.0 5.5%	6887.0 5.8%	7161.0 5 1%	7539.0	7835 5.0%	8060 5.0%	+	nt (\$mill) on Total C	an'i	5
mmon Stock 89,409,613 of 10/25/21	shs.		8.8%	8 2%	7.5%	9.2%	7.6%	8 2%	8 4%	8 5%	8.3%	5.9%	9.0%	9.5%	Return o	on Shr. Ec	uity	9
RKET CAP: \$4.8 billion	(Mid Cap)		8.8%	8.2%	2.9%	9.2%	7.6%	8.2% 3.5%	8.4%	8 5%	8 3%	<u>5 9%</u> 6%	9.0% 3.5%	9.5% 3.5%		on Com E d to Com		9 3
ECTRIC OPERATING ST			54%	57%	61%	50%	56%	57%	58%	59%	63%	90%	62%	62%		is to Net I		1
hange Retail Sales (KWH)	018 2019 -25 +12 207 17827	2020 + 4 18472				eneral E stomers I							13%, wir venues					
Indust, Revs, per KWH (c)	207 17827 4.79 4.75 859 NA	4 99 NA	area of	Oregon	includin	g Portlan	d and Si	alem Th	e compa	ny is in	2,900 ft	ill-time ei	mployees	Chairn	han Jack	E Davis	Presid	lent
(Load, Summer (Nw) 3 Jal Load Factor (%)	816 3765 NA NA	3771 NA				ssioning evenue b					dress .	121 S W	Officer N Salmor	h Street,	Portlan	d, Örego	n 97204	
hange Customers (yr-end)	⊧111 +1.1 ——	+15				10%; c		• • • • •					8000 Inte					
Charge Cov (%)	266 265	187 d '18-'20				e ral E The							are № lance					
NUAL RATES Past hange (per sh) 10 Yrs,	5 Yrs. to	24-'26				of \$89 umissi					quar	ter res	sults i ity fi	n mid	l-Febr	uary.	atad	
venues -1 0% ash Flow" 4 0% mings 4 0%	.5% 4.5% 1.5%	4.0% 5 0% 7 0%	veno	rs ha	ve re	ached	a se	ettlem	ent f	or a	sour	ce pla	an. Th	ns is	for up	o to 1,	000 n	neg
nings 40% idends 40% ok Value 3.0%	6.0% 3 5%	5.5% 3.0%				equity e same							ipacity bendin					
I- QUARTERLY REVE		Full	requ	ested	The	utilit	y wai	nts to	place	e an	PGE	build	s, the	comp	any n	aight l	have	to
lar Mar.31 Jun.30 S	p.30 Dec.31	Year				ations er ris							. Othe ed thr					nc
19 573 460 5	25 524 12 548	1991 2123	tion	mana	geme	nt, wil Fhe in	ldfire	mitig	ation,	and	PGE	ĥas	defei cover	rred	some	e expe	enses	; f
	7 556 2 612	2145 2400				pleted							had					
22 625 550 6	50 625	2450				he bu ected i							overy, tem r					
II- EARNINGS PER Iar Mar.31 Jun.30 Se		Full Year	to ta	ke eff	èct on	May	1st.				majo	r stor	ms 1n	Febr	uary (of 202	1, an	d e
18 .72 .51	.59 .55	2.37				iings kely							· costs ed are					; w
	.61 68 119 .57	2.39	forw	ard	in 20	0 22 . 7	The c	ompa	rison	was	The	stocl	k pri	ce_so	ared	24%	in 2	
21 1 07 .36 22 1.05 .45	.56 .76 .60 .80	2.75 2.90				as a 1 \$1.09							tis co vas a					
I- QUARTERLY DIVIDE		Full	quar	ter o	f 202	0. In	2022	2, PG	E sh	ould	comp	any's	impro	oved p	prospe	ects (s	uch a	s a
ar Mar.31 Jun.30 Se	p.30 Dec.31	Year				partia					celera	ating tors. '	load The di	grow ivider	tn) ai id yie	re apj ld 1s a	pealin verag	.g (e f
	3625 .3625 385 .385	1.41 1.50	the	utility	. Our	estim	ate o	f \$2.9	0 a s	hare	a uti	lity. H	loweve	er, tot	al ret	urn p	otenti	al
	385 .4075	1.56	mıgh	it eve	en be	cons	ervati						or the				and	su
	43 .43	1.68	this	ıs jus	t sligh	ntly ab	oove t	he up	per ei	nd of	par f	or the	e 3- to	5-yea	ır peri	iod.		

 (A) Diluted EPS Excl. nonrecurring losses '13, holder investment plan avail, (C) Incl. deferred '20 60%. Regulatory Climate Average (F) '05 42c, '17, 19c. Next earnings report due mid-charges. In '20: \$569 mill, \$6.35/sh. (D) In mill.
 (B) Div'ds paid mid-Jan, Apr., July, and CC. a Div'd reinvestment plan avail † Share- come of a provide the base: Net ong cost Rate allowed on contract of the base. Net ong cost Rate allowed on contract of the base of the base of the base. Net ong cost Rate allowed on contract of the base of the base. Net ong cost Rate allowed on the base of the base of the base. Net ong cost Rate allowed on contract of the base of the base. Net ong cost Rate allowed on the base of the base of the base. Net ong cost Rate allowed on the base of the base of the base of the base of the base. Net ong cost Rate allowed on the base of the base. Net ong cost Rate allowed to be relable and is provided without warranties of any kind the publication is strictly for subscriber's own, non-commercial, internal use No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product. Company's Financial Strength Stock's Price Stability Price Growth Persistence Earnings Predictability B++ 90 50 85

Exhibit DWD-3

<u>S0</u>	UTH	ERN	<u>C0</u>	<u>MPA</u>	<u>NY n</u>) R	ecent Rice	* • •	9 P/E RATI	o 19.	2 (Trailin Media	ng: 19,6 an: 16,0)	RELATIVE P/E RATI	5 1.0	B YLD	3.9		ALU LINE		-
TIMELI SAFET		4 Lowered 2 Lowered		Low.	46 7 35 7 NDS	48 6 41 8		51 3 40 3	53 2 41 4	54 6 46.0	53.5 46 7	49 4 42.4	64 3 43.3	71.1 42.0	68 9 56.7	69 8 65.4				Price	
TECHN	ICAL	3 Raised 1	/28/22	0 dr	62 x Divide vided by In elative Pric	ends p sh terest Rate										-					+160
BETA	95 (1.00	= Market)		Options	Yes Yes																\pm^{120}_{100}
		get Price	-										-			•	<u> </u>				- 80
Low-Hi	•	dpoint (%	to Mid)					<u> </u>			 				لىكىنى،						+ 60 - 50
\$56-87		7 (-5%) ROJECTIC	MC		لينبس		ուս _ս սա	, impl'	հուսնու			նորիոր		1				[+40
20.		A	nn'l Total		····																30
High	Price 75 55	Gain (+10%)	Return 6%					·····	•••••	······				•••							-20
Low		(-20%) Decisio	-1%									******			······	•			. RETUR		_ 15
	1Q202	202021	302021	Percen			Į											tyr.	THIS STOCK 22 9	INDEX 15,7	L.
to Buy to Sell	676 649	580	676 598	shares traded	12 - 6 †		t. Tillull			liillii			<u> </u>		rintitiat			3 yr	61 2 74.9	56 8 75 5	-
HId's(000 2006	627954 2007		633336 2009	2010	2011	2012	2013			2016	2017		2019	2020	2021	2022	2023	5 yr © VALL	JE LINE P		25-27
19.24	20.12		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	Revenue			27.5
4 01	4.22	1	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		ow" per		9.0
2 10 1.54	2 28	1	2 32 1.73	2.36 1.80	2.55 1.87	2.67 1.94	2 70	2 77 2.08	2 84 2.15	2 83 2.22	3 21 2.30	3.00 2.38	3.17 2.46	3 25 2,54	3.50 2.62	3.60 2.70	3.80 2.78	Earnings Div'd De			4.5 3.0
4.01	4.65		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	Cap'l Sp			6.2
15.24	16.23		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	Book Va			32.7
746.27	763 10		819.65 13.5	843.34 14.9	865.13 15.8	867.77	887.09 16 2	907.78	911.72 15.8	990.39 17 8	1007.6	1033.8	1053.3	1056 5 17.9	1070.0 18.0	1070.0 Bold fig	1070.0	Common Avg Ann			1070. 15.
.87	.85	1	,90	95	.99	1.08	91	84	.80	.93	78	82	.94	.92	.95	Value	Line		P/E Ratio		.8
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%	estin	ates	Avg Ann	'l Div'd Y	ield	4.5%
		JCTURE a 336 mill, E			52 mill	16537	17087	18467	17489	19896	23031	23495	21419	20375	23000	24150	25350	Revenue			2935
T Deb	t \$48843	3 mill. L				2415.0 35.6%	2439.0 34 8%	2567 0 33 8%	2647.0 33.4%	2757 0 28 5%	3269.0 25 2%	3096 0	3354 0 15 9%	3481.0 14.3%	3750 13.5%	3840 14.0%	4085	Net Profi Income 1			487
		italized A	nnual ren	tals \$300) mill.	9.4%	11.6%	13 9%	13.2%	11 9%	7 6%	6 8%	6 0%	6.6%	7.0%	6.0%	6.0%	AFUDC 9		Profit	4.0%
		s-12/20 \$1	5367 mil			49.9%	51 5%	49 5%	52.8%	61 5%	64 5%	62.0%	60 1%	61 5%	63.5%	63.5%	63.5%	Long-Ter			63.09
ofd Sto	ck \$291	mill F	ان fd Div'd	blig \$166 \$15 mill	546 mill.	47 3% 38653	45 8% 41483	47 3% 42142	44 0%	35 7% 69359	35 0% 68953	37 6% 65750	39 5% 69594	38 1% 73336	36.0% 79250	36.5% 81475	36.0% 84925	Common Total Ca			37.09
		583% c shs 42%				48390	51208	54868	61114	78446	79872	80797	83080	87634	91875	94825	1	Net Plan		,	10410
ar)					(\$100	7 3%	6.8%	71%	6.6%	4.9%	5.9%	5.9%	6.0%	5.9%	6.0%	6.0%	6.0%	Return o			6.5%
Comme	on Stocl	< 1,059,80	3,931 shs	3		12 5% 12.8%	12 1% 12.5%	12.1% 12.5%	12.0% 12.6%	10.3%	13.3% 13.4%	12.4% 12.5%	12.1% 12.1%	12.3% 12.4%	13.0% 13.0%	13.0% 13.0%	13.5%	Return o Return o			14.0% 14.0%
ARKE	T CAP:	\$74 billio	n (Large	Cap)		3 6%	3.2%	3.2%	31%	2.5%	3.9%	2.6%	2.8%	2.8%	3.5%	3.5%	3.5%	Retained	to Com	Èq	4 5
ELECT	RIC OPI	ERATING	STATISTI 2018	ICS 2019	2020	73%	75%	75%	76%	78%	72%	79%	77%	78%	75%	76%		All Div'd			679
Change	Retail Sales Use (MWH	(KWH)	+3 6 3048	-8 5 2947	-5 3 NA						ough its AL, and							%; MS, 6 5%, othe			
iva. Indust	Revs oer l	WH (c)	6 04	6.03 41940	NA NA	compet	itive gen	eration b	usiness	Acq'd A	GL Reso	urces (re	named	Fuel co:	sts. 23%	of revs.	'20 repor	ted depr	rates (u	til.). 2 6%	6-3 7%
eak Load,	Yearend (M Symmer (M	₩}F		34209	NA NA						ers in G <i>I</i> rev. brea							s and Cl r Blvd N			
6 Change	d Factor (%) Customers (/r-end)	+1.0	60 3 -8 9	+1.3						9%; oth							southern			
ixed Char	je Cov (%)		280	281	270						eorgi							will re			
	LRATE		Pas		'18-'20	Subs	ad 4	y exj of the	pects Vog	to co tle n	omple uclea	ete U r stai	tion					in the sales			
leveni)% 4	25-'27 4 0%	in t	he th	ird q	quarte	er of	2022	and	the	sider	ation.	For	now, '	we_do	not	antici	pate
Cash Earning		4.0° 3 0'	% 2.5	5% 3	4.5% 5.5%						, resp							in the			ears
Divider Book V	ids alue	3 5 3 5	% 3.5 % 3.0	5% 0%	3.0% 3.5%						cant c nine							any a advan			vear
Cal-		RTERLY RE			Full						fterta							ny's u			
ndar	Mar.31		Sep.30		Year						the which							f and as in			
2019 2020	5412 5018	5098 4620	5995 5620	4914 5117	21419 20375	recov	verabl	e in	rates.	We	exclu	ded t	hese	ord a	a full	year'	's effe	ect of	a \$24	40 mi	illioı
2021	5910	5198	6238	5654	23000						prese: capita							a 9.' comm			
022 023	6200 6500	5600 5900	6600 6 9 00	5750 6050	24150 25350						Georgi							on De			
Cal-		RNINGS P			Full	45.7°	% sha	re of	the p	roject	. As c	f Sep	tem-	lanta	Gas	Light	receiv	ved \$4	9 mil	lion a	t th
ndar	Mar.31	Jun.30	Sep.30	Dec.31	Year						ned to onal c							iat Ge se on J			r ex
2019 2020	.75 .81	.85 .75	1 25 1.18	.32 51	3 17 3.25						treet]							nd in			the
2021	1.09	.73	1.22	.46	3.50	these	e in s	tride.	In 20	21, So	outher	n Cor	npa-	seco	nđ qu	larte	r. We	think	the l	poard	will
2022 2023	1.05 1.10	.80 .85	1.30 1.40	.45 .45	3.60 3.80						rn of is ind		, not					ayout recer			nare
Cal-		TERLY DIVI			Full						issue		uity	The	divid	end y	yield	is sor	newh	at al	
ndar		Jun.30		Dec.31	Year	and	sold	asse	ts to	finaı	nce tl	he ri	sing					ty. Di			
2018	.58	.60	.60	.60	2.38						clear ulf P							, and uncer			
2019 2020	.60 .62	.62 .64	.62 64	.62 .64	2.46 2.54	tric 1	atility	in Fl	lorida	a few	year.	s ago,	and	from	the n	uclea	r cons	structi			
2021	.64	66	.66	.66	2.62						panies				is un			E.	hnum	~, 77	200
2022	d EDO	Evol	00 00-	(100000)							sold				E. De	· · · · ·			ebruar		
	u ⊑۳5	Excl, noni	ec gain i	(IUSSES)	Feb				ar., June,		cost Allo							Financia		ui	A
). (25¢) 3¢), '17	13, (8	3¢); 14, (1961, 15,	(250), 1	o, ang i	Dec.	v'd reinv	est plan	avail. (C)		Regulato	arned on	avg cor	1 eq. 20	3, 12.5%.			ce Stabili th Persis			90 35

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Exhibit DWD-3

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(C	<u>el</u> e	NEF	<u>i</u> GY 1	NDQ-XI	1		P	ecent Rice	69.8	6 RATI	o 23 .	3 (Traili Medi	ing: 23.9 an: 17.0)	RELATIVE P/E RATI		2 DIV'D YLD	2.8	% 	ALU LINE		
		3 Raised		High Low	24.4 19.8	27 8 21 2	29.9 25 8	31 8 26 8	37 6 27.3	38.3 31.8	45 4 35 2	52.2 40 0	54,1 41 5	66 1 47.7	76 4 46 6	72.9 57 2	}			t Price 2025	
AFET		Raised !		LEGE	NDS 68 x Divide	ends p sh						1							2024	2025	
ECHN FTA	ICAL 4 80 (1.00	4 Raised ·	1/14/22	R Optrons	68 x Divide wided by In elative Price Yes	terest Rate e Strength													_		
	<u> </u>	get Price	e Range	- Shaded	area indica	ales recess	ion														1
ow-Hi	gh Mic	ipoint (%	to Mid)					<u> </u>			ļ				ЩЩШ	11 ¹¹ 111	•				<u> </u>
57-\$94		6 (10%)									and the	1			<u> </u>						
			nn'l Total				المتطلقان	fortung:		1.000 million											+:
gh	Price 75	Gain (+5%) (-15%)	Return 5% Nil	المتشرقين الم		·····									· •						+:
w stitu		(-15%) Decisio				*····				·			-n·1,m*-			•••••••		% тот	RETUR		-1
	102021 348	202021 381	302021 355	Percen							ļ							1 yr	THIS STOCK 4.4	INDEX 25.4	L
Buy Sell Ks(000)	396 405318	344	343 411220	shares traded	10 -	aluulu		olahik	mont	thritti	iltinin	नननन	111111111	hinnitu		ahaada		3 yr.	49 0 92 2	84,2 88 5	F
005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022			UB, LLC	24-
3 86	24 16 3.61	23.40	24 69 3.50	21.08	21.38 3.51	21.90 3 79	20.76 4.00	21.92	23.11 4 28	21.72 4.56	21.90	22.46 5.47	22,44 5 92	21.98 6.25	21 45	24.65	25.75	Revenue			2
3.28 1.20	1.35	1.35	3.50 1.46	1 49	1.56	1 72	4.00	1.10	2 03	2.10	5.04 2 21	2.30	247	2.64	6.61 2.79	7.10 2.95	7.55 3.10	Earnings	low" per s per sh		
85	.88	.91 4.89	.94	.97 3.91	1.00 4.60	1.03 4 53	1.07 5.27	1.11 6,82	1.20 6.33	1.28	1.36	1.44	1.52	1 62	1.72	1.83	1.94	Div'd De			
3.25 3.37	14.00	14.70	15.35	15.92	16.76	4 55	5.27 18,19	19 21	20.20	7.26 20.89	6 42 21.73	22 56	7 70 23.78	8.05 25 24	9.99 27 12	8.30 28.45	9.70 29.85	Book Va	ending p lue per s		1
3 39	407.30	428 78	453.79	457.51	482.33	486 49	487.96	497.97	505,73	507,54	507.22	507.76	514.04	524.54	537.44	540.00	544.00	Commor			55
15.4 .82	14.8 .80	16.7	13.7 .82	12.7 .85	14.1 .90	14.2 .89	14.8 .94	15.0 84	15 4 81	16.5 .83	185 97	20.2	18 9 1 02	22.3 1.19	23.9 1.23	22.5 1.20		Relative	'I P/E Ratio	,	
6%	4.4%	4.0%	4.7%	5.1%	4.5%	4.2%	3 9%	3.9%	3.8%	3.7%	3.3%	31%	3 3%	2.7%	2.6%	2.8%		Avg Ann			3
			as of 9/30 Due in 5 N)/21 Yrs \$5174	4 mil	10655 841.4	10128 905.2	10915 948 2	11686 1021.3	11024 1063 6	11107 1123.4	11404	11537 1261 0	11529 1372 0	11526 1473 0	13300					1
Deb	\$20979	mili l	T Interes	st \$780 m		35 8%	33 2%	33.8%	33.9%	35.8%	34 1%	30.7%	12.6%	8.5%	14730	1600 NMF	NMF	income 1			
		ance leas ied: 2.9x)				9 4%	10.8%	13 4%	12 5%	7.7%	7.8%	9.4%	12 4%	8 3%	10.7%	7.0%	7.0%	AFUDC			;
ises	. Uncapi	talized A	nnual ren	ntals \$273	mill	51.1% 48.9%	53.3% 46.7%	53.3% 46.7%	53 0% 47.0%	54.1% 45 9%	56.3% 43.7%	55.9% 44 1%	56 4% 43.6%	56.8% 43.2%	57.4% 42.6%	58.0% 42.0%	57.5% 42.5%	Long-Ter Commor			58 42
		s-12/20 \$	3599 mill	Oblig \$3	1	17331	19018	20477	21714	23092	25216	25975	28025	30646	34220	36425	38125	Total Ca	pital (\$mi		4
l Sto	ck None			Obig to		22353 6 5%	23809 6.1%	26122 6.0%	28757 6.0%	31206 5.8%	32842	34329 5 8%	36944 5 7%	39483 5.6%	42950	<u>45175</u> 5.5%	48050	Net Plan Return o		'an'l	5
		538,675	,570 shs			9 9%	10,2%	9.9%	10.0%	10 0%	10,2%	10.2%	10.3%	10 4%	10 1%	10.5%	10.5%	Return o	n Shr. Ec	uity	11
)/26/21 T CAP	\$38 billio	on (Large	Cap)	-	9 9% 4 3%	10.2%	9 9%	10.0%	10.0%	10.2%	10.2%	10.3%	10.4%	10.1% 4.2%	10.5%	10.5% 4.0%	Return o Retained			11
			STATIST	ICS		56%	54%	54%	55%	57%	61%	62%	58%	58%	58%	62%	62%	All Div'd			1
hange F	Retail Sales (KWH)	2018 +3 2	2019 -1.2	2020				ly Inc. is							ec rev b					
eC&I	Use (MWH) Revs per KV	VH (c)	23004 5 91	NA 5.96	NA 5.78				electricity Michigar							& ind'l, 36% of					
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ial Loac tange C	l Facior (%) Customers (yi	r-end)	NA +1.1	NA +1.0	NA NA				& New N							-330-550					us,
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Exhibit DWD-3

Oncor Electric Delivery Company LLC Summary of Risk Premium Models for the Proxy Group of Fourteen Electric Companies

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

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
Evergy, Inc.	0.41%	0.57%	0.49%	0.82	4.90%	2.89%	7.79%
Eversource Energy	0.31%	0.37%	0.34%	1.62	6.75%	2.89%	9.64%
IDACORP, Inc.	0.29%	0.28%	0.28%	2.21	7.80%	2.89%	10.69%
NorthWestern Corporation	0.33%	0.20%	0.27%	2.26	7.51%	2.89%	10.40%
OGE Energy Corporation	0.31%	0.32%	0.31%	2.20	8.65%	2.89%	11.54%
Portland General Electric Company	0.28%	0.29%	0.29%	2.10	7.43%	2.89%	10.32%
The Southern Company	1.27%	0.35%	0.81%	0.98	9.97%	2.89%	12.86%
Xcel Energy Inc.	0.28%	0.24%	0.26%	2.81	9.03%	2.89%	11.92%
						A	10.050/

Average 10.85% Median 10.69%

10.77% Average of Mean and Median

Notes:

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

Exhibit DWD-4 Page 2 of 13

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>		Proxy Group of Fourteen Electric Companies
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	0.41_(2)
3.	Adjusted Prospective Yield on A2 Rated Public Utility Bonds	4.36 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group	0.17 (3)
5.	Adjusted Prospective Bond Yield	4.53 %
6.	Equity Risk Premium (4)	6.37
7.	Risk Premium Derived Common Equity Cost Rate	<u> 10.90 </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 Jan-2022 Dec-2021	3.25 % 2.93 2.65_	3.68 % 3.33 3.04	3.95 % 3.57 <u>3.28</u>
Average	2.94_%	3.35 %	3.60 %

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

	Long-Tern	oody's 1 Issuer Rating ch 2022	Standard & Poor's Long-Term Issuer Rating March 2022		
Proxy Group of Fourteen Electric Companies	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

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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	А
A3	7	A-
Baa1	8	BBB+
Baa2	9	BBB
Baa3	10	BBB-
Ba1	11	BB+
Ba2	12	BB
Ba3	13	BB-
B1	14	B+
	14	B
B2		в-
B3	16	D-

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

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

Line No.	-	Proxy Group of Fourteen Electric Companies
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)	5.52
4.	Average equity risk premium	6.37 %
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 <u>Proxy Group of Fourteen Electric Companies</u>

<u>Line No.</u>	Equity Risk Premium Measure	Proxy Group of Fourteen Electric Companies
<u>It</u>	botson-Based Equity Risk Premiums:	
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)	10.65
7.	Conclusion of Equity Risk Premium	8.75 %
8	Adjusted Beta (7)	0.93
9.	Forecasted Equity Risk Premium	8.14 %

Notes provided on page 9 of this Exhibit.

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

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.

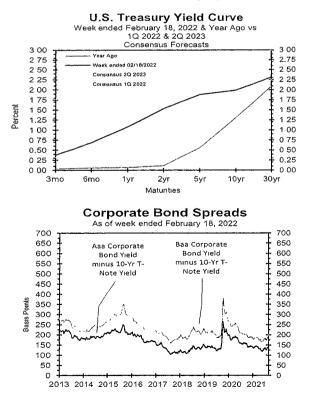
Sources of Information:

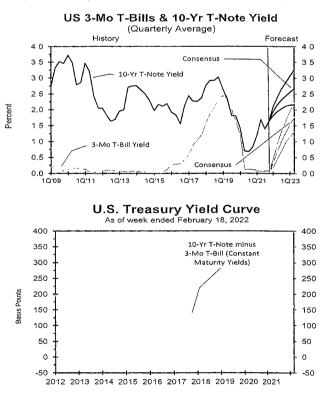
Stocks, Bonds, Bills, and Inflation - 2021 SBBI Yearbook, John Wiley & Sons, Inc. Industrial Manual and Mergent Bond Record Monthly Update. Value Line Summary and Index Blue Chip Financial Forecasts, March 1, 2022 and December 1, 2021 Bloomberg Professional Service

	History						Cons	ensus l	orecas	sts-Qua	arterly	Avg.		
					1Q	2Q	3Q	4Q	1Q	2Q				
Interest Rates	<u>Fcb 18</u>	<u>Feb 11</u>	Fcb 4	<u>Jan 28</u>	<u>Jan</u>	Dec	Nov	<u>4Q 2021</u>	<u>2022</u>	<u>2022</u>	<u>2022</u>	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.	038	031	0 21	019	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	098	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 2 5	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
				Histor	y				Ce	nsensu	is Fore	casts-(Quarter	∵ly
	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q
Key Assumptions	2020	<u>2020</u>	2020	<u>2020</u>	<u>2021</u>	2021	<u>2021</u>	<u>2021</u>	2022	2022	<u>2022</u>	2022	2023	2023
Fed's AFE \$ Index	1113	1124	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	-51	-312	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	16	-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	13	-1.6	37	15	3.8	6.5	5.3	63	5.1	3.5	2.8	2.4	2.3	2.3

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

Forecasts for interest rates and the Federal Reserve's Advanced Foreign Economies Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index, CPI and PCE Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data. Treasury rates from the Federal Reserve Board's H.15, AAA-AA and A-BBB corporate bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity, State and local bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity, State and local bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity, State and local bond 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 find 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.

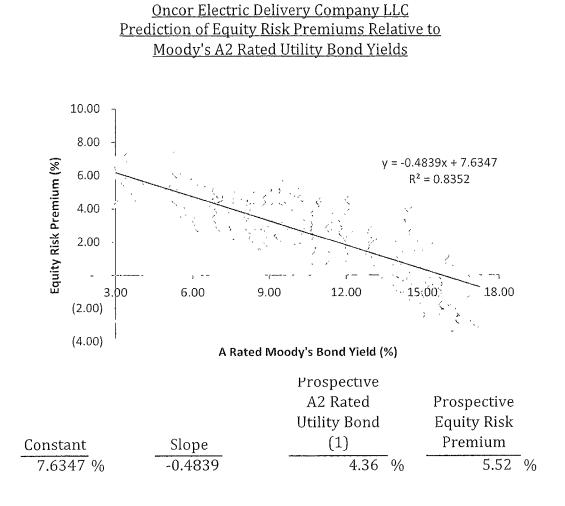
			Ave	rage For The `	Ƴear		Five-Year	Averages
		2023	2024	2025	2026	2027	2023-2027	2028-2032
1 Federal Funds Rate	CONSENSUS	0.8	1.6	2.0	2.2	2.3	1.8	2.2
	Top 10 Average	12	22	27	27	28	23	2.9
	Bottom 10 Average	04	10	14	17	18	12	15
2. Prime Rate	CONSENSUS	4.0	4.7	5.1	5.3	5.4	4.9	5.3
	Top 10 Average	4 3	53	58	58	59	54	60
	Bottom 10 Average	36	41	4.5	49	50	44	46
3 LIBOR, 3-Mo	CONSENSUS	1.0	1.7	2.2	2.4	2.5	1.9	2.4
	Top 10 Average	13	21	27	29	30	24	31
	Bottom 10 Average	07	12	16	19	20	15	18
4 Commercial Paper, 1-Mo	CONSENSUS	0.9	1.6	2.1	2.3	2.4	1.9	2.4
	Top 10 Average	12	20	26	28	29	23	29
	Bottom 10 Average	06	12	16	19	20	15	18
5 Treasury Bill Yield, 3-Mo	CONSENSUS	0.8	1.4	1.8	2.0	2.3	1.7	2.2
	Top 10 Average	12	19	25	26	28	22	29
	Bottom 10 Average	04	08	12	15	18	11	16
6 Treasury Bill Yield, 6-Mo	CONSENSUS	0.8	1.4	1.9	2.1	2.4	1.7	2.3
	Top 10 Average	12	20	26	27	29	23	3.0
	Bottom 10 Average	04	09	12	16	19	12	17
7 Treasury Bill Yield, I-Yr	CONSENSUS	1.0	1.6	2.1	2.4	2.5	1.9	2.4
	Top 10 Aveiage	14	21	27	28	30	24	3.1
	Bottom 10 Average	06	12	15	19	20	14	18
8. Treasury Note Yield, 2-Yr	CONSENSUS	1.3	1.9	24	2.6	2.6	2.2	2.6
	Top 10 Average	17	25	30	3 1 2 0	32 21	27	34
0 Transver Nata Vield 5 Vr	Bottom 10 Average CONSENSUS	08 1.9	14 2.4	18 2.8	2.9	2.9	1 6 2.6	19
9 Treasury Note Yield, 5-Yr		2.3	3.0	2.0 3 4	3 5	3 6	3 1	3.0 3 8
	Top 10 Average Bottom 10 Average	15	1.9	21	23	2.3	2.0	2.2
10 Treasury Note Yield, 10-Yr	CONSENSUS	2.4	2.8	3.1	3.2	3.2	2.0	3.3
to Treasting Note Held, to-th	Top 10 Average	2.4	3 3	3.1	3 8	3.9	3 5	4 2
	Bottom 10 Average	20	23	24	25	2 5	23	2.4
11. Treasury Bond Yield, 30-Yi	CONSENSUS	2.9	3.3	3.6	37	3.7	3.4	3.8
The freusing bond field, so fr	Top 10 Average	3 4	39	4 3	4.4	4.4	41	4 6
	Bottom 10 Average	24	28	29	3 0	3.0	2.8	30
12. Corporate Aaa Bond Yield	CONSENSUS	37	4.2	4.5	46	4.8	4.4	4.9
	Top 10 Average	43	47	5 1	52	54	49	56
	Bottom 10 Average	3 2	37	39	4 1	4 2	38	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	51	55	59	6 1	62	57	65
	Bottom 10 Average	40	4 5	48	49	50	47	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	38	4 3	4 5	47	48	44	50
	Bottom 10 Average	27	32	34	35	36	33	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	50	53	54	54	5 1	57
	Bottom 10 Average	36	39	4 1	4 1	4 2	4 0	4 1
A Fed's AFE Nommal \$ 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-(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	24	23	26	24
	Bottom 10 Average	22	17	17	17	17	18	17
C. GDP Chamed Price Index	CONSENSUS	2.5	2.2	2.2	2.1	2.1	2.2	2.1
	Top 10 Average	30	27	2 5	24	24	26	24
	Bottom 10 Average	20	19	19	19	19	19	18
D Consumer Price Index	CONSENSUS	26	2.3	2.3	2.2	2.2	23	2.2
	Top 10 Average	32	28	2.6	25	25	27	25
	Bottom 10 Average	21	20	20	20	20	20	1.9
E. PCE Price Index	CONSENSUS	2.5	2.2	2.1	2.1	2.1	2.2	2.1
	Top 10 Average	30	26	24	24	23	26	24
	Bottom 10 Average	20	19	19	19	19	19	19

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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

.ine No.		Implied Equity Risk Premium
	Equity Risk Premium based on S&P Utility Index Holding Period Returns (1):	
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)	5.42
6.	Average Equity Risk Premium (6)	5.44 %

- 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.



Notes:

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

Source of Information: Regulatory Research Associates

	[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)	Rısk-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 %	<u> 12.21 </u> %	12.13 %
Average of Mean and Median			0.93			<u> 12.06 </u> %	12.23 %	12.15 %

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

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: Arithmetic Mean Income Returns on Long-Term Government Bonds: MRP based on Ibbotson Historical Data [.]	12.20 % 5.05 7.15 %
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*. Projected Rısk-Free Rate (see note 2)· MRP based on Value Lıne Summary & Index: *Forecasted 3-5 year capital appreciation plus expected dıvıdend yıeld	11.39 % 2.89 8.50 %
Measure 5: Value Line Projected Return on the Market based on the S&P 500	
Total return on the Market based on the S&P 500: Projected Risk-Free Rate (see note 2): MRP based on Value Line data	$ \begin{array}{r} 16.14 & \% \\ \underline{2.89} \\ 13.25 & \% \end{array} $
Measure 6. Bloomberg Projected MRP	
Total return on the Market based on the S&P 500: Projected Risk-Free Rate (see note 2): MRP based on Bloomberg data	$ \begin{array}{r} 14.60 & \% \\ \underline{2.89} \\ \underline{11.71} & \% \end{array} $
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
	2.89 %

(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 <u>Comparable in Total Risk to the Utility Proxy Group</u>

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

The Non-Price Regulated Proxy Group companies were then selected based on the unadjusted beta range of 0.65 - 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:

Standard Deviation of the Std. Err. of the Regr. = 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

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

1

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

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

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	[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) 2 std. Devs. of Beta	0.65 0.14	0.93		
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.5237	3.0101		

2 std. devs. of the Res. Std. Err. 0.2432

Std. dev. of the Res. Std. Err.

Source of Information: Valueline Proprietary Database, March 2022

0.1216

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

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	[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	070	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	087	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	070	2.6150	0.0647
Texas Instruments	0.85	0.76	2.6869	0.0665
AMERCO	0.95	090	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	0.00	0.70	2760	0.0404
companies	0.89	0.79	2.7669	0.0686

Source of Information:

Valueline Proprietary Database, March 2022



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

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 nonutility 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 ¹ 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 marketbased 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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Pauline M. Ahern is a senior financial analyst with AUS Consultants — Utility Services Group. She has participated in many cost-of-capital studies. A former employee of the U.S. Department of the Treasury and the Federal Reserve Bank of Boston, she holds an MBA degree from Rutgers University and is a Certified Rate of Return Analyst.

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 ratebase/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

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 Phillips² as well as by Bonbright, Danielsen and Kamerschen³ 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 However, 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_{ii} = *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*₁ = least-squares regression slope coefficient, the unadjusted beta.

As shown by Francis,⁴ the total variation or risk of a firm's return, Var (r_i) , comes from two sources:

Var (r_i) = total risk of *i*th asset

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= $\operatorname{var}(a_i + b_i r_m + e)$ substituting $(a_i + b_i r_m + e)$ for r_i = $\operatorname{var}(b_i r_m) + \operatorname{var}(e)$ since $\operatorname{var}(a_i) = 0$ = $b_i^2 \operatorname{var}(r_m) + \operatorname{var}(e)$ since $\operatorname{var}(b_i r_m) = b_i^2$ $\operatorname{var}(r_m)$ = systematic + unsystematic risk

As a measure of systematic risk, we use the Value Line unadjusted beta. Beta measures the extent to which marketwide 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, firmspecific 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

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

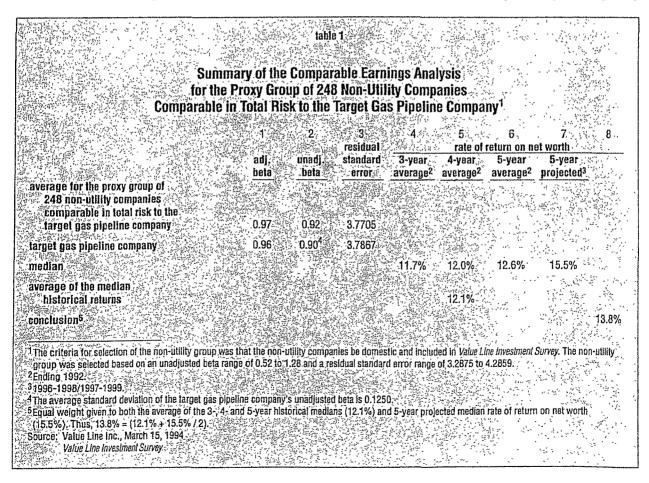
Three standard deviations of the target utility's unadjusted beta equals 0.38 (0.1250 x 3 = 0.3750, rounded to 0.38) Consequently, the range of unadjusted betas to be used as a selection criteria is $0.52 - 1\ 28\ (0.52 = 0\ 90\ - 0.38)$ and (1.28 = 0.90 + 0.38).

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: $\Omega/\sqrt{2N}$

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 $0.1664 (0.1664 = 3.7867/\sqrt{2(259)} =$ 37867/22.7596, 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 x 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

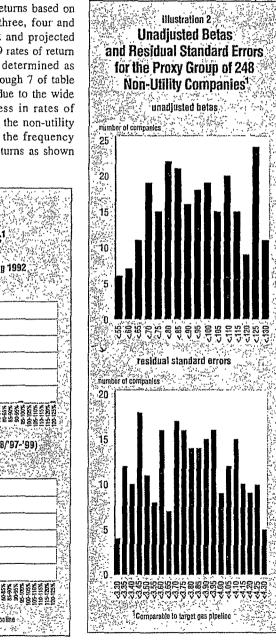


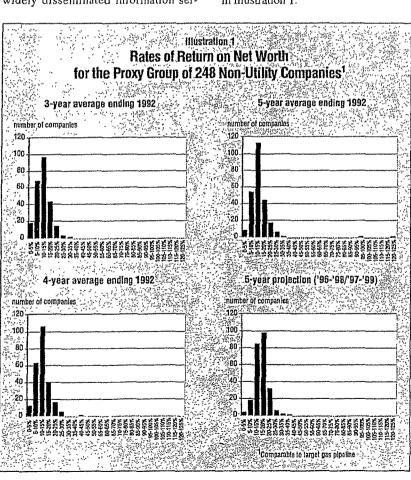
process Consequently, we believe all utilities must be eliminated to avoid circularity. Moreover, we believe nondomestic firms must be eliminated because their reporting methods differ significantly from U.S. firms.

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 worth⁶ 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 services, 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 comcontinued on page 8





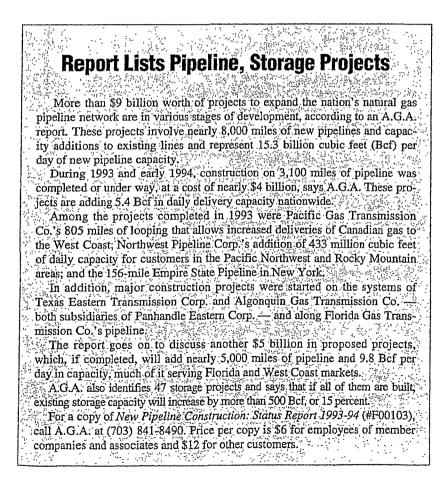
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parable earnings cost rate is based upon the mid-point of the average of the median three-, four- and five-year historical rates of return on net worth of 12 1 percent as shown in column 5 and the median projected 1996-1998/1997-1999 rate of return 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 endof-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.

¹Bluefield 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) ²Charles F Phillips Jr , The Regulation of Public Utilities: Theory and Practice, Public Utilities Reports Inc. 1988. p 379 ³James C Bonbright, Albert L Danielsen and David R Kamerschen. Principles of Public Utilities Rates. 2nd edition. Public Utilities Reports Inc 1988, p 329 ⁴Jack Clark Francis, Investments: Analysis and Management, 3rd edition. McGraw-Hill Book Co, 1980, p 363 ⁵Id.p 548 ⁶Returns 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 Fifth Edition

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Jack Clark Francis

Bernard M. Baruch College City University of New York

McGraw-Hill, Inc

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Chapter 10 The Characteristic Line and the CAPM

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 Var(r). This measure of total risk is partitioned into its systematic and unsystematic components in Equation (10-8).⁷

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

$$= Var(a_i + b_i r_{m,i} + e_{i,i})$$
by substituting $(a_i + b_i r_{m,i} + e_{i,i})$ for $r_{i,i}$

$$= 0 + Var(b_i r_{m,i}) + Var(e_{i,i})$$
since $Var(a_i) = 0$ (10-8)
$$Var(r_i) = b_i^2 Var(r_m) + Var(e) \text{ since } Var(b_i r_m) = b_i^2 Var(r_m)$$

$$= \text{systematic + unsystematic risk}$$
(10-8a)
$$.01389 = .00780 + .00609 \text{ for IBM}$$

The unsystematic risk measure 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 ρ^2 (that is, the characteristic line's squared correlation coefficient).

¹In 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, $Cov(r_m, e_{t,t}) = 0$. The mathematics of regression analysis will orthogonalize the residuals and thus ensure that the needed statistical independence exists.

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Part 2 Introduction to Investments Theory

$$\frac{\text{Systematic risk}}{\text{Total risk}} = \frac{b_i^2 \operatorname{Var}(r_m)}{\operatorname{Var}(r_m)} = \rho^2$$

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

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 $\rho = .5$.⁸ 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: ρ^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.⁹ 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

⁸The average ρ 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.

⁹Professor 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.

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Chapter 10 The Characteristic Line and the CAPM

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

10-3 CAPITAL ASSET PRICING MODEL (CAPM)

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 σ . 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.¹²

¹⁰Statements about the relative degree of total risk are made in the context of a longrun 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 bistorical variability of return.

¹¹Empirical 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.

¹²Both 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.

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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 <u>Proxy Group of Fourteen Electric Companies</u>

Principal Methods		Proxy Group Forty-Eight No Price Regulate Companies	on-
Discounted Cash Flow Model (DCF) (1)		12.70	%
Risk Premium Model (RPM) (2)		12.73	
Capital Asset Pricing Model (CAPM) (3)	12.07	_
	Mean	12.50	_%
	Median	12.70	_%
	Average of Mean and Median	12.60	_%

Notes:

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

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

	[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 Giowth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (1)
Agilent Technologies	060 %	11.50 %	900 %	13.61 %	11.37 %	063 %	12.00 %
Abbott Labs.	149	10.00	7.80	12.12	997	1.56	12.00 %
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	1478	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 0 0	NA	11.80	10.40	1.71	12 11
Brady Corp	1.81	9.50	7.00	7 00	7.83	1 88	971
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	030	9 50	8 30	6 60	8 13	0 31	8 4 4
CSW Industrials	051	14 00	NA	12 00	13 00	0.54	13.54
Danaher Corp.	035	22 00	20 50	1687	1979	0.38	20.17
Dolby Labs	1.21 098	10.50	13.00	16.00	13.17	1 29	14 46
Exponent, Inc. FactSet Research	0.98	12.00 9.50	NA 8.40	15 00 9 75	13.50	1 05	14 55
GATX Corp	1.95	5.50	8.40 NA	12 00	9 22 8.75	0.81 2.04	10.03
Gentex Corp	1.53	10.00	12.80	15 80	12.87	1.61	10 79 14,48
Alphabet Inc	-	23.50	19.80	14 10	19.13	-	14.48 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
[&] Snack Foods	1.63	8 50	NA	6.00	7 25	1.69	894
Henry (Jack) & Assoc	1.14	10 50	17 00	14.00	13 83	1.22	15 05
McCormick & Co	152	6.00	610	7 20	643	1.57	8 00
Monster Beverage	-	13 00	15 90	1401	14 30	-	NA
Motorola Solutions	134	8 00	9 0 0	14.27	10 42	1.41	11 83
Mettler-Toledo Int'i		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	900	5.00	16.40	10 13	2 93	13 06
Post Holdings	-	1650	NA	26.40	21 45	-	NA
RLI Corp	0.95 1.57	12 00 6 50	NA 8.70	9.80	10 90	1.00	11 90
Service Corp. Int'l Sherwin-Williams	0.83	11 50	12 40	7.06 14 00	7 42 12 63	1 63 0 88	9 05
Selective ins Group	1.40	11.00	NA	13 40	12.03	1.49	13 51 13.69
Sirius XM Holdings	1.40	30 50	9 70	975	16.65	1.49	18 17
Sensient Techn	1.90	2.50	NA	3.80	3.15	1.93	5 08
Thermo Fisher Sci	021	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
UmFirst Corp.	0 64	5.50	NA	10.00	7 75	0.66	8 4 1
VeriSign Inc.	-	8.50	NA	8.00	8,25	-	NA
Waters Corp	•	6 0 0	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 <u>1261</u>%

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>		Proxy Group of Forty- Eight Non-Price Regulated Companies
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 Rısk Premium (3)	8.14
5.	Risk Premium Derived Common Equity Cost Rate	<u> </u>

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 prosepctive 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.		Baa2 Corp.			
	Bond Yield		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.

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

	Mood Long-Term Is March	suer Rating	Standard & Poor's Long-Term Issuer Rating March 2022		
Proxy Group of Forty-Eight Non- Price Regulated Companies	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	50	AA-	4.0	
Analog Devices	A3	7.0	A-	70	
Assurant Inc.	Baa3	10.0	BBB	9.0	
Smith (A.O.)	NA		NA		
Air Products & Chem.	A2	60	A	6,0	
Brown-Forman 'B'	A1	50	A-	7,0	
Ball Corp.	Bal	110	BB+	11.0	
Bristol-Myers Squibb	A2	60	A+	5.0	
Broadridge Fin'l	Baal	80	BBB+	80	
Brady Colp	NA		NA		
CACI Int'l	NA		BB+	110	
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	90	BBB	9.0	
Gentex Corp.	NA		NA		
Alphabet Inc	Aa2	30	AA+	20	
Ingredion Inc	Baa1	8.0	BBB	90	
Hunt (J B)	Baal	80	BBB+	8.0	
[&] Snack Foods	NA		NA		
Henry (Jack) & Assoc	NA		NA		
McCormick & Co	Baa2	9.0	BBB	90	
Monster Beverage	NA		NA		
Motorola Solutions	Baa3	100	BBB-	10 0	
Mettler-Toledo Int'l	WR		NR		
Northrop Grumman	Baa1	80	BBB+	80	
Old Dominion Freight	NA		NA		
Pfizer, Inc	A2	60	A+	50	
Packaging Corp.	Baa2	90	BBB	9.0	
Post Holdings	B2	150	B+	14.0	
RLI Corp	Baa2	9.0	BBB	90	
Service Corp Int'l	Ba3	130	BB+	11.0	
Sherwin-Williams	Baa2	90	BBB	9,0	
Selective Ins. Group	Baa2	90	BBB	9,0	
Sirius XM Holdings	NA		BB	12.0	
Sensient Techn.	WR		NR		
Fhermo Fisher Sci.	A3	7.0	BBB+	80	
Fexas Instruments	Aa3	40	A+	5.0	
AMERCO	WR		NR		
UniFirst Corp.	NA		NA		
VeriSign Inc.	Baa3	100	BBB	90	
Waters Corp.	NA		NA		
Watsco, Inc.	NA		NA	<u> </u>	
Average	Baa1	83	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 <u>Proxy Group of Fourteen Electric Companies</u>

<u>Line No.</u>	Equity Risk Premium Measure	Proxy Group of Forty-Eight Non- Price Regulated Companies
]	Ibbotson-Based Equity Risk Premiums:	
1.	Ibbotson Equity Risk Premium (1)	5.92 %
2.	Regression on Ibbotson Rısk 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)	10.65
7.	Conclusion of Equity Risk Premium	8.75 %
8.	Adjusted Beta (7)	0.93
9.	Forecasted Equity Risk Premium	8.14_%
Notes:		

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

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

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	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Forty- Eight Non-Price Regulated Companies	Value Linc 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)
Aglent Technologies	0,90	0.98	0.94	984 %	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	1174	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	984	2 89	12 53	12 58	12 55
Bristoi-Myers Squibb	0.85	0.64	074	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	984	2.89	12.63	12.65	12.64
Danaher Corp.	0.80	0 82	0 81	984	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	984	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	984	2 89	12.33	12.43	12.38
Gentex Corp.	0.95	1 09	1 02	984	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	984	2 89	12 43	12.51	12 47
J&J Snack Foods	0.95	0 72	0 83	984	2.89	11.05	11.47	11 26
Henry (Jack) & Assoc	0 85	0 78	0 82	984	2.89	10 96	11.40	11 18
McCormick & Co	080	0 59	0.70	9.84	2 89	9.78	10.51	10 14
Monster Beverage	0.85	1.00	0 92	984	2.89	11.94	12.14	12.04
Motorola Solutions	0 90	1 01	0 95	984	2 89	12 24	12.36	12 30
Mettler-Toledo Int'i	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	101	9.84	2.89	12 83	12 80	12.81
Pfizer, Inc.	080	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	984	2.89	12 63	12 65	12.64
Sherwin-Williams	0.90	0.98 1.00	0 94 0,95	9.84	2.89 2.89	12 14	12 28	12.21
Selective Ins. Group Sirius XM Holdings	0.90 0.95	1.00	0.95	9.84 9.84	2,89	12.24	12 36	12.30
Sensient Techn	0.95	0.99	0.98	9.84 9.84	2,89	12 53	12.58	12 55
Thermo Fishei Sci	0.90	0,76	0.80	9.84	2 89	12 24 10.76	12 36 11 25	12.30
Texas Instruments	0 85	0.70	0.00	984	289			11 01
AMERCO	0 85	1 13	1 04	984	2 89	11 64 13 12	11 92 13 02	11.78 13.07
UniFirst Corp	0.95	1.10	1.02	984	2.89	12.92	12.87	
VenSign Inc.	0.95	0 78	0.84	9.84 9.84	2.89	12.92	11.55	12.90
Waters Corp.	0.95	0.94	0.94	9.84	2.89	12.14	12.28	11 35 12.21
Watsco, Inc.	0.85	0.74	0.82	9.84	2.89			
114000, IIIC.	0.00	0.0		201	2.09	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 Medran			0.93			<u>11 97</u> %	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.

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<u>Oncor Electric Delivery Company LLC</u> Derivation of Investment Risk Adjustment Based upon <u>Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAQ</u>

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

[1]

	Decile	Sma	Market pitalization of illest Company (millions)		Market apitalization of irgest Company (millions)	Size Premium (Return in Excess of CAPM)*
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	137%
	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	501%
		*From 20	021 Duff & Phelps C	ost of Ca	pıtal Navigator	

[2]

[3]

[4]

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%.

Exhibit DWD-10 Page 1 of 2

		Market Capitalization	of Oncor Electric Del oup of Fourteen Elect	ivery Company LLC and the			
		[1]	[2]	[3]	[4]	[5]	[6]
Company	_ Exchange_	Common Stock Shares Outstanding at Fiscal Year End 2021 (millions)	Book Value per Share at Fiscal Year End 2021 (1)	Total Common Equity at Fiscal Year End 2021 (millions)	Closing Stock Market Price on March 18, 2022	Market-to- Book Ratio on March 18, 2022 (2)	Market Capitalization on March 18, 2022 (3) (millions)
Oncor Electric Delivery Company LLC		NA	NA	8,467.25 (4) <u>NA</u>		
Based upon Proxy Group of Fourteen Electric Companies						201.3(5)	<u>\$ 17,044.578</u> (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

Oncor Electric Delivery Company LLC

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

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

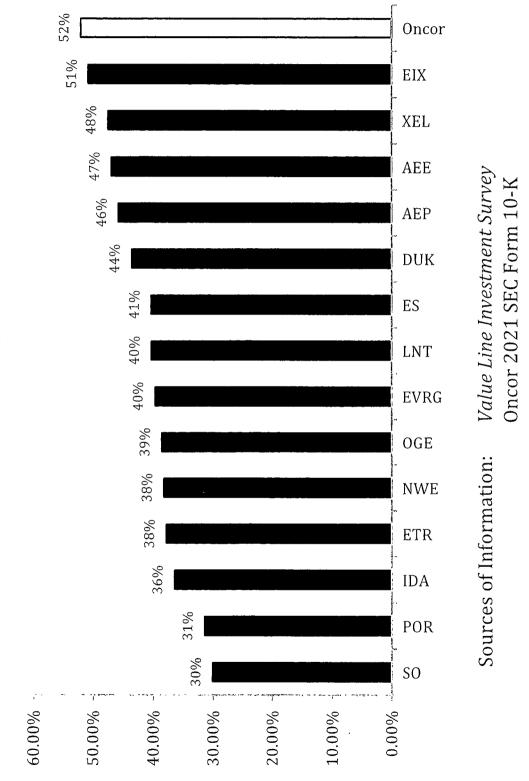
		<u>Moody's</u> Long-Term Issuer	<u>Moody's</u> <u>Senior</u> Secured	Nume	rical	
Company	Ticker	Rating	Rating	Weight		Difference
Interstate Power and Light Company	LNT	Baa1	NA	8,00	NR	
Wisconsin Power and Light Company	LNT	A3	NA	7 00	NR	
Ameren Illinois Company	ACE	A3	A1	7.00	5 00	2
Illinois Power Company	AEE	NA	NA	NR	NR	
Union Electric Company	AEÊ	Baa1	A2	8.00	6 0 0	2
Central Illinois Light Company	AEE	NA	A1	NR	5.00	-
AEP Texas Central	ACP	Baa2	NA	9 0 0	NR	
AEP Texas Inc.	AEP	Baa2	NA	9 0 0	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	NΛ	900	NR	
Wheeling Power Company	AEP	NA	NA	NR	NR	
Duke Energy Carolinas, LLC	DUK	A2	Aa3	600	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	Baal	NA	8.00	NR	
Duke Energy Ohio, Inc	DUK	Baa1	A2	8.00	6.00	2
Duke Energy Progress, LLC	DUK	A2	Aa3	6 0 0	4 0 0	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 0 0	NR	
Southern California Edison Company	EIX	Baa2	A3	9 00	7.00	2
Entergy Arkansas, LLC	ETR	Baa1	A2	8.00	600	2
Entergy Gulf States Louisiana, LLC	ETR		A2	NR	6 0 0	
Entergy Louisiana, LLC	ETR	Baa1	A2	8 0 0	6 0 0	2
Entergy Mississippi, LLC	ETR	Baa1	AZ	8 0 0	6 0 0	2
Entergy New Orleans, LLC	ETR	Bal	Baa2	11.00	900	2
Entergy Texas, Inc	ETR	Baa2	A3	9 00	7 00	2
Evergy Kansas Central, Inc.	EVRG	Baa1	A2	8 0 0	6 0 0	2
Evergy Kansas South, Inc	EVRG	Baa1	A2	8 0 0	6 0 0	2
Evergy Metro, Inc	EVRG	Baa1	A2	8 0 0	600	2
Evergy Missouri West, Inc	EVRG	Baa2	A3	9 0 0	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	2
	ES					
Eversource Gas Company of MA		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 0 0	2
Yankee Gas Services Company	ES	Baa1	A2	8 0 0	6 0 0	2
Idaho Power Company	IDA	A3	A1	7 00	5 0 0	2
NorthWestern Corporation	NWE	Baa2	A3	9.00	7 00	2
Oklahoma Gas and Electric Company	OGE	A3	WR	700	NR	
Portland General Electric Company	POR	A3	A1	7.00	500	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 0 0	NR	
Mississippi Power Company	SO	Baal	WR	8 0 0	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 0 0	4 0 0	2
Northern States Power Company - WI	XEL	A2	Aa3	6 0 0	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	700	2
South restern r done service company	ADL	Dada	A3	500	/ 00	2
Neter						

.

Notes[.] (1) Page 6 of Exhibit DWD-4.

Source[.] S&P Capital IQ

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



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

WP/D'Ascendis-Direct Page 1 of 1

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
11.	PURPOSE OF TESTIMONY	4
111.	OVERVIEW OF ACCOUNTING AND REGULATORY RULES	
	FOR PENSIONS	4
IV.	OVERVIEW OF ACCOUNTING AND REGULATORY RULES	
	FOR POSTRETIREMENT BENEFITS	11
V.	ADJUSTED TEST YEAR COST	19
VI.	CONCLUSION	28
AFFI	DAVIT	30
EXHI	BITS	
	CONFIDENTIAL EXHIBITS FILED UNDER SEAL	
	Exhibit ACT 1 Actuarial Valuation Depart for 2022 Data Case	

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)

PUC Docket No.

1		DIRECT TESTIMONY OF ALAN S. TAPER
2		I. POSITION AND QUALIFICATIONS
3	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
4	Α.	My name is Alan S. Taper. My business address is 5005 LBJ Freeway,
5		Suite 1400, Dallas, Texas 75244.
6	Q.	BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
7	Α.	I am a consulting actuary and Senior Partner with Aon plc. ("Aon"). I have
8		more than 30 years of experience in providing consulting services to
9		clients on employee benefit matters.
10	Q.	PLEASE DESCRIBE AON.
11	Α.	Aon is a leading global professional services firm providing a broad range
12		of risk, retirement, and health solutions. With offices in almost 120
13		countries, Aon employs approximately 50,000 people.
14	Q.	PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND.
15	Α.	I earned a Bachelor of Business Administration degree with high honors
16		with a concentration in Actuarial Science from the University of Texas at
17		Austin.
18	Q.	ARE YOU A CREDENTIALED ACTUARY?
19	Α.	Yes, I am a Fellow of the Society of Actuaries, a Member of the American
20		Academy of Actuaries, a Fellow of the Conference of Consulting
21		Actuaries, and an Enrolled Actuary under the Employee Retirement
22		Income Security Act of 1974 ("ERISA").
23	Q.	WHAT DOES IT TAKE TO BECOME A FELLOW OF THE SOCIETY OF
24		ACTUARIES AND AN ENROLLED ACTUARY?
25	Α.	An actuary must pass a series of exams administered by the Society of
26		Actuaries to become a Fellow. In addition, the Joint Board for Enrollment
27		of Actuaries administers a separate series of exams to become an
28		Enrolled Actuary. When I took them, the actuarial exams were offered
29		once or twice a year. A candidate normally takes one exam at each
30		session so it typically takes many years to pass all of the exams. There
	PUC	Docket No Taper – Direct

PUC Docket No. _____

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	Α.	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	Α.	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	А.	Accounting Standards Codification 715-30 - Compensation Defined
	PUC	Docket No Taper – Direct
		Oncor Electric Delivery 2022 Rate Case

- 4 -

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

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

9 Q. IN WHICH DEFINED BENEFIT PENSION PLANS DOES ONCOR10 CURRENTLY PARTICIPATE?

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

- 18 Q. WHY DOES ONCOR HAVE RESPONSIBILITY FOR OBLIGATIONS19 RELATED TO THE VISTRA RETIREMENT PLAN?
- A. As described later in my testimony, Vistra owns former affiliates of Oncor,
 and certain participants of the Vistra Retirement Plan had service with the
 predecessor integrated electric utility company before its unbundling under
 Public Utility Regulatory Act ("PURA") Chapter 39 ("unbundling"). Pension
 benefits for these plan participants attributable to their regulated service
 are Oncor's responsibility.

26 Q. HOW DO THE PENSION PLANS DETERMINE BENEFITS FOR27 PARTICIPANTS?

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

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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 Α. A gualified 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-gualified plan. The 24 qualified plans account for about 97% of Oncor's total projected benefit 25 obligation.

26 Q. WHAT ARE PENSION BENEFIT OBLIGATIONS?

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

30 Q. UNDER WHAT AUTHORITY ARE PENSION BENEFIT OBLIGATIONS

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1 DETERMINED?

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

9 Q. WHAT DIFFERENT MEASURES OF PENSION BENEFIT OBLIGATIONS10 WILL BE REFERRED TO IN THIS TESTIMONY?

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

Projected benefit obligation ("PBO") is the actuarial present value of
benefits, based on current service, that are expected to be paid to
an individual from the plan. This measure includes projected future
pay growth, but only reflects benefit service that has been earned
as of the valuation date.

Service cost is the actuarial present value of benefits earned during
the current measurement period on a PBO basis.

19 Q. WHAT INFORMATION IS NEEDED FOR THESE CALCULATIONS?

A. There are three elements of information required to determine the pensionbenefit obligations:

22 Census data containing applicable demographic Census Data: 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 benefi
5	obligations are determined.
6	 Assumptions: Oncor and Vistra, based on the recommendations or
7	their actuaries and investment consultants, make certair
8	assumptions to model the impact of future events for thei
9	respective plans. ASC 715-30 requires that "each significan
10	assumption used shall reflect the best estimate solely with respec
11	to that individual assumption." These assumptions are reviewed by
12	Oncor's and Vistra's independent auditors, respectively, fo
13	reasonableness.
14	Q. WHAT ARE THE KEY ASSUMPTIONS USED?
15	A. The following are key assumptions used to determine pension benefi
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 fo
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 retired
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 discoun
29	rate should reflect settlement rates, which may be approximated by
30	the rate of return on high-quality, fixed-income investment
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currently available whose cash flows match the timing of the
 amount of the expected future benefit payments.

- Expected Return on Plan Assets: Because the annual pension cost
 is offset by the anticipated return on plan assets, ASC 715-30 calls
 for an assumed rate of return on plan assets for future years. This
 rate should be reasonable based on the actual and targeted
 investment mix for the pension plan assets.
- Pay Increase Rate: The PBO and service cost reflect a projection
 of pay increases into the future. The assumed pay increase rates
 are determined by Oncor and Vistra, respectively, with input from
 their actuaries, and are intended to reflect reasonable future
 expectations.
- Cash Balance Interest Crediting Rate: The cash balance interest
 crediting rate is updated annually based on the yield on 30-year
 Treasury securities. Because the interest crediting rates for future
 years are unknown, a reasonable estimate of future rates is
 required based on the current rate and expectations of the future.

Form of Benefit Payment: An assumption about the form of
 payment that each plan participant will elect upon retirement is
 required. For example, cash balance participants can elect a lump
 sum distribution of their benefits in lieu of a lifetime annuity.

Q. WHAT ARE THE COMPONENTS OF NET PERIODIC PENSION COSTUNDER GAAP, AND HOW ARE THEY CALCULATED?

A. ASC 715-30 lists the six components of net periodic pension cost asfollows:

Service Cost: The service cost is the actuarial present value of
 benefits earned during the current measurement period on a PBO
 basis. The assumptions and methodology are similar to the
 determination of the PBO, except that the service cost is the
 accrual for the measurement period rather than the accumulation of

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prior accruals.

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- Interest Cost: The interest cost is the increase in the PBO due to the shortening of the discount period resulting from the passage of time and reflecting the current discount rate.
 - Expected Return on Plan Assets: The expected return on plan assets represents the expected investment return, net of administrative and investment expenses, adjusted to smooth asset 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 the expected remaining working period for active employees 15 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 to plan assumptions. ASC 715-30 does not require immediate 20 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.
- Amortization of Unrecognized Transition Obligation or Asset: The
 difference between the PBO and plan assets compared with the
 amount recognized on a company's balance sheet when FAS 87

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

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

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

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

Oncor, the power generator Luminant (previously known as TXU Power 18 Α. 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.

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IV. OVERVIEW OF ACCOUNTING AND REGULATORY RULES FOR POSTRETIREMENT BENEFITS

28 Q. WHAT ARE "OPEBs"?

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

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

4 Q. IN WHICH POSTRETIREMENT BENEFIT PLANS DOES ONCOR5 CURRENTLY PARTICIPATE?

6 Oncor currently participates in two postretirement benefit plans - the Α. 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 unbundling) and the non-regulated affiliate businesses. Participants in the 17 18 Shared Retiree Welfare Plan are known as "Shared Retirees."

19 Q. WHY DID ONCOR ESTABLISH THE SHARED RETIREE WELFARE20 PLAN?

21 Α. 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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Taper – Direct Oncor Electric Delivery 2022 Rate Case Q. DID THE TRANSFER OF POSTRETIREMENT BENEFIT COVERAGE
 FOR SHARED RETIREES FROM THE ONCOR RETIREE WELFARE
 PLAN TO THE SHARED RETIREE WELFARE PLAN HAVE ANY
 IMPACT ON BENEFITS FOR PLAN PARTICIPANTS?

5 Α. 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 RETIREE16 WELFARE PLAN?

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

22 Q. HOW DO THE POSTRETIREMENT BENEFIT PLANS DETERMINE23 BENEFITS FOR PARTICIPANTS?

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

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

4 Q. WHAT ARE POSTRETIREMENT BENEFIT OBLIGATIONS?

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

8 Q. UNDER WHAT AUTHORITY ARE POSTRETIREMENT BENEFIT9 OBLIGATIONS DETERMINED?

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

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

A. There are three types of postretirement benefit obligations that will bediscussed:

Expected postretirement benefit obligation ("EPBO") is the actuarial
 present value of the company-paid portion of all benefits expected
 to be paid to an individual and any covered dependents from the
 plan – including projected future costs.

Accumulated postretirement benefit obligation ("APBO") represents
 the portion of the EPBO that is attributable to past service. The
 APBO is determined by multiplying the EPBO by the ratio of (a)
 each person's service as of the valuation date, over (b) each
 person's service projected to the date he or she is fully eligible for

retiree benefit coverage.

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

7 Q. WHAT INFORMATION IS NEEDED TO CALCULATE8 POSTRETIREMENT BENEFIT OBLIGATIONS?

9 A. There are three elements of information required to determine the10 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 individual's age, gender, service period, subsidiary identification 15 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.

 Plan Provisions: A plan description and annual enrollment materials describe the provisions of the plans. These provisions 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 assumptions to model the impact of future events. ASC 715-60 25 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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Q. WHAT ARE THE KEY ASSUMPTIONS USED?

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

- 1 Q. WHAT ARE THE COMPONENTS OF NET PERIODIC 2 POSTRETIREMENT BENEFIT COST AND HOW ARE THEY 3 CALCULATED?
- A. ASC 715-60 lists the six components of net periodic postretirement benefit
 cost as follows:
- Service Cost: The service cost is the actuarial present value of
 benefits earned during the current measurement period on an
 EPBO basis. The assumptions and methodology are similar to the
 determination of the APBO, except that the service cost is the
 accrual for the measurement period rather than the accumulation of
 prior accruals.
- Interest Cost: The interest cost is the increase in the APBO due to
 the shortening of the discount period resulting from the passage of
 time and reflecting the current discount rate.
- Expected Return on Plan Assets: The expected return on plan
 assets represents the expected investment return, net of
 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.
- Amortization of Unrecognized Gains or Losses: Gains and losses
 are defined as changes in the APBO and plan assets due to plan
 experience that differs from assumptions, as well as any changes
 to plan assumptions. ASC 715-60 does not require immediate
 recognition of these changes. Rather, gains or losses may be

1deferred and recognized in postretirement benefit cost to the extent2that the total amount exceeds a "corridor" specified in ASC 715-60.3Amounts outside of this corridor, which is equal to 10% of the4greater of the APBO and the applicable plan asset value, are5generally recognized over the expected remaining working period6for 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 UNDER18 PURA § 36.065?

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

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

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

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

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V. ADJUSTED TEST YEAR COST

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

A. Yes. Costs associated with providing regulated electric service are
labeled "Recoverable" in all of my exhibits, while costs not associated with
providing regulated electric service are labeled "Nonrecoverable."
Nonrecoverable costs are not included in test year cost because they are
not associated with regulated service either prior to or after the date of
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 Aon, on behalf of Oncor and Vistra, performed six actuarial studies Α. 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

based on benefit obligations and plan assets as of the last day of the prior
fiscal year. Therefore, the GAAP pension cost for fiscal year 2022,
reflecting known and measurable changes during 2021 and shown in the
fiscal year 2022 actuarial studies, is a better measure of the on-going level
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 As set forth in Exhibit AST-1, the GAAP recoverable pension cost Α. 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?

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

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

- A. Yes. The total GAAP recoverable pension cost for fiscal year 2022 shown
 above is \$48,016,493. This compares with \$80,911,733 in total GAAP
 recoverable pension cost for fiscal year 2017 included in my prior direct
 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 As described earlier in Section III of my testimony, the GAAP pension cost A. 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?

A. From fiscal year 2017 to fiscal year 2022, the recoverable service cost
increased by \$7.3 million. The increase in service cost was primarily due
to a decrease in discount rates used to calculate the service cost.
Changes in discount rates are dictated by changes in market interest
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?

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

- The expected change in the unfunded PBO is equal to the difference between the interest cost on the PBO and the expected return on plan assets. The recoverable interest cost during the period exceeded the recoverable expected investment return by \$5.7 million, increasing the unfunded PBO by this amount.
 - The actual return on recoverable plan assets during the period exceeded the expected return on plan assets by \$479.2 million. The favorable investment return reduced the unfunded PBO by this amount.
 - Oncor contributed \$374.9 million to the recoverable portion of the pension plans during the period. Contributions to the plans in excess of the service cost during the period reduced the unfunded PBO by \$238.4 million.
- The unfunded PBO is impacted by the discount rates used to calculate the PBO. Because the discount rates were lower as of December 31, 2021, than as of December 31, 2016, the recoverable unfunded PBO increased by \$417.0 million during the period. As with the service cost calculation, changes in discount rates are dictated by changes in market interest rates, which are outside of Oncor's control.
- The unfunded PBO is also impacted by actual plan demographic
 experience differing from expected based on the actuarial
 assumptions as well as changes in actuarial assumptions. The
 recoverable unfunded PBO increased by \$38.9 million during the
 period due to these factors.

26 Q. HOW DID THE CHANGE IN RECOVERABLE UNFUNDED PBO IMPACT

- 27 THE GAAP RECOVERABLE PENSION COST FROM FISCAL YEAR28 2017 TO FISCAL YEAR 2022?
- 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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on plan assets, and amortization components of recoverable pension cost
 decreased by \$40.2 million from fiscal year 2017 to fiscal year 2022.

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Q. WHAT WAS THE NET CHANGE IN THE GAAP RECOVERABLE PENSION COST FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?

5 Α. 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.

Q. DID ONCOR TAKE ANY PENSION RISK TRANSFER ACTIONS SINCE
THE LAST RATE CASE IN 2017 TO SETTLE ANY OF ITS
RECOVERABLE PENSION OBLIGATIONS?

16 Yes. In 2019. Oncor transferred \$74.6 million of recoverable PBO and Α. 17 corresponding plan assets for 1,640 retirees and beneficiaries in pay status with recoverable service from the Oncor Retirement Plan to Pacific 18 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 the group included in the voluntary offer, 619 former employees with 23 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

1 TRANSFER TRANSACTIONS HAVE ON THE ONCOR RETIREMENT 2 PLAN?

3 Α. By taking these actions, Oncor reduced its plan administration burden and eliminated future premiums paid to the Pension Benefit Guarantee 4 Corporation ("PBGC") related to the impacted plan participants. 5 The recoverable PBGC premium savings during 2020 through 2022 6 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?

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

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

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

- 2021 and shown in the fiscal year 2022 actuarial studies, is a better
 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?
- A. As set forth in Exhibit AST-4, the GAAP recoverable postretirement benefit
 cost determined for Oncor under the Oncor Retiree Welfare Plan for fiscal
 year 2022 is \$8,616,786. As set forth in Exhibit AST-5, the GAAP
 recoverable postretirement benefit cost determined for Oncor under the
 Shared Retiree Welfare Plan for fiscal year 2022 is \$10,273,842. I have
 provided this information to Company witness Mr. W. Alan Ledbetter for
 inclusion in rates. These costs are reasonable and necessary.
- Q. DID THE GAAP RECOVERABLE POSTRETIREMENT BENEFIT COST
 FOR FISCAL YEAR 2022 CHANGE FROM THE COMPARABLE
 AMOUNT FOR FISCAL YEAR 2017 DESCRIBED IN YOUR PRIOR
 DIRECT TESTIMONY IN COMMISSION DOCKET NO. 46957, ONCOR'S
 LAST BASE RATE CASE?
- A. Yes. The total GAAP recoverable postretirement benefit cost for fiscal
 year 2022 shown above is \$18,890,628. This compares with \$56,906,188
 in total GAAP recoverable postretirement cost for fiscal year 2017
 included in my prior direct testimony in Docket No. 46957.

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

24 As described earlier in Section IV of my direct testimony, the GAAP Α. 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

postretirement benefit cost is measured annually, these amounts change
 every fiscal year. To simplify the discussion below, monetary amounts are
 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?

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

13 Q. HOW DID THE RECOVERABLE UNFUNDED APBO CHANGE FROM14 DECEMBER 31, 2016, TO DECEMBER 31, 2021?

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

The expected change in the unfunded APBO is equal to the difference between the interest cost on the APBO and the expected return on plan assets. The recoverable interest cost during the period exceeded the recoverable expected investment return by \$151.7 million, increasing the unfunded APBO by this amount.

The actual return on recoverable plan assets during the period
 exceeded the expected return on plan assets by \$25.4 million. The
 favorable investment return reduced the unfunded APBO by this
 amount.

Oncor contributed \$176.0 million to the recoverable portion of the

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1postretirement benefit plans during the period. Contributions to the2plans in excess of the service cost during the period, reduced the3unfunded APBO by \$144.8 million.

- The unfunded APBO is impacted by the discount rates used to calculate the APBO. Because the discount rates were lower as of December 31, 2021, than as of December 31, 2016, the recoverable unfunded APBO increased by \$180.5 million during the period. As with the service cost calculation, changes in discount rates are dictated by changes in market interest rates, which are outside of Oncor's control.
- The adoption of fully-insured medical coverage for the Shared
 Retiree Welfare Plan resulted in a significant reduction in the plan's
 APBO. That reduction was partially offset by small improvements
 in other medical and life coverage during the period in the Oncor
 Retiree Welfare Plan. The net impact of these changes is a
 reduction in recoverable unfunded APBO of \$75.3 million.
- Retiree health care costs increased at a slower rate than assumed during the period. As a result, the recoverable unfunded APBO decreased by \$294.0 million.
- The unfunded APBO is also impacted by actual plan demographic
 experience differing from expected based on the actuarial
 assumptions as well as changes in actuarial assumptions. The
 recoverable unfunded APBO decreased by \$51.1 million during the
 period due to these factors.

Q. HOW DID THE CHANGE IN RECOVERABLE UNFUNDED APBO
IMPACT THE GAAP RECOVERABLE POSTRETIREMENT BENEFIT
COST FROM FISCAL YEAR 2017 TO FISCAL YEAR 2022?

A. Based on the reduction in unfunded APBO of \$258.4 million from
 December 31, 2016, to December 31, 2021, the total interest cost,
 expected return on plan assets, and amortization components of

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	Α.	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	Α.	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.

- 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.

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<u>AFFIDAVIT</u>

STATE OF TEXAS § SCOUNTY 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^{+-} day of April, 2022.



Notary Public, State of Texas

PUC Docket No. _____

Taper – Direct Oncor Electric Delivery 2022 Rate Case

EXHIBIT AST-1 EXHIBIT AST-2 EXHIBIT AST-3 EXHIBIT AST-4 EXHIBIT AST-5 EXHIBIT AST-6 EXHIBIT AST-7 EXHIBIT AST-7 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.

PUC Docket No. _____

Taper – Direct Oncor Electric Delivery 2022 Rate Case

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.

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DIRECT TESTIMONY OF MATTHEW A. TROXLE

		Direct restimont of matthew A. Moxee
1		I. POSITION AND QUALIFICATIONS
2	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT
З		EMPLOYMENT POSITION.
4	Α.	My name is Matthew A. Troxle. My business address is 1616 Woodall
5		Rodgers, Dallas, Texas. I am the Director of Rates & Load Research for
6		Oncor Electric Delivery Company LLC ("Oncor" or "Company").
7	Q.`	PLEASE DISCUSS YOUR EDUCATIONAL BACKGROUND AND
8		PROFESSIONAL QUALIFICATIONS.
9	Α.	I graduated from Louisiana State University in 1995 with a Bachelor of
10		Science degree in Business Administration Pre-Law. In 1997, I received
11		the degree of Master of Science in Economics from Louisiana State
12		University. I began my employment with the Louisiana Public Service
13		Commission in 1997 as an Economist in the Economics and Rate Analysis
14		Division. In 1999, I began employment with the Public Utility Commission
15		of Texas ("Commission") as a Rate Analyst. In 2000, I was named Senior
16		Rate Analyst, and in 2005, I was promoted to be the Director of Retail
17		Market Oversight. In 2007, I became the Director of the newly formed Tariff
18		and Rate Analysis group. In 2008, I began employment with CenterPoint
19		Energy Service Company as a Manager of Gas Rates in the Regulatory and
20		Government Affairs organization. In 2012, I was promoted to the Director
21		of Rates position, and in 2015, I assumed the position of Director of
22		Regulatory Affairs for Louisiana and Mississippi. In 2019, I joined Oncor in
23		my current role as the Director of Rates & Load Research. In my current
24		position, I am responsible for oversight of the rates and load research efforts
25		of Oncor.
26	Q.	HAVE YOU PREVIOUSLY PROVIDED TESTIMONY BEFORE THE
27		COMMISSION?
28	Α.	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
З	Q.	WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS
4		PROCEEDING?
5	Α.	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)
1		support the calculation of the proposed Network Transmission Service
12		("NTS") rate, the Wholesale Substation Service ("XFMR") rate, the
3		Wholesale Distribution Line Service ("DLS") rate, Oncor Electric Delivery
14		Company NTU LLC's ("Oncor NTU") Wholesale Distribution Substation
5		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-
8		I-1, II-I-2, II-I-3, IV-J-1, IV-J-2, IV-J-3, IV-J-6, and IV-J-7.
9	Q.	WERE YOUR TESTIMONY AND THE COST OF SERVICE SCHEDULES
20		YOU SPONSOR PREPARED BY YOU OR UNDER YOUR DIRECT
21		SUPERVISION?
22	Α.	Yes. My testimony, exhibits, the schedules that I sponsor, and associated
23		workpapers were prepared by me or under my direction, supervision, or
<u>2</u> 4		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	Α.	Schedule I-A: Cost of Service Summary.
30		Schedule II-I-1: Class Revenue Requirement Analysis - This schedule
	PUC	Docket No Troxle – I

- provides the Rate Class Cost of Service Study and includes the revenue
 requirement analysis for the test year.
- 3 <u>Schedule II-I-2</u>: Class Allocation Factors This schedule provides a listing
 4 of the allocation factors used to assign costs to the various rate classes.
- <u>Schedule II-I-3</u>: Functionalized Cost of Service Analysis (Non-ERCOT
 Members) This schedule is not applicable, as the Company is an Electric
 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. <u>Schedule IV-J-1</u>: 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.
- Schedule IV-J-2: Proposed Charges for Discretionary Services and Other
 Services This schedule shows the proposed charges for each
 discretionary and other service charge included in the Tariff for Retail
 Delivery Service and the Tariff for Transmission Service.
- 17 <u>Schedule IV-J-3</u>: Rate Class Definition This schedule provides the
 18 definition of all retail rate classes.
- Schedule IV-J-6: Justification for Consumption Level-Based Rates This
 schedule is not applicable, as the Company is not proposing any
 consumption level-based rates.
- Schedule IV-J-7: Proof of Revenue Statement This schedule provides a
 proof of revenue statement that shows the proposed prices and the resulting
 base revenue, by rate class, for each applicable charge.
- 25 26

IV. RATE CLASS COST OF SERVICE STUDY

A. General Concepts

- Q. PLEASE DISCUSS THE GENERAL CONCEPT OF PERFORMING A
 RATE CLASS COST OF SERVICE STUDY THAT YOU APPLIED IN THIS
 PROCEEDING.
- 30 A. A rate class cost of service study is an accounting and engineering analysis

1 of cost causation that determines the proper allocation of the Company's 2 plant investment, revenues, and expenses to the appropriate rate classes. З 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 premise or a point of delivery. 10

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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 base accounts (see Schedules II-B-1 through II-B-12, as described in the 14 direct testimony of Company witness Mr. W. Alan Ledbetter); (2) 15 classification of all revenue, expense, and rate base accounts; (3) 16 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.

1. Functionalization

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

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- Transmission ("TRAN");
- Distribution ("DIST");