# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION DOCKET NO. 130040-EI 

IN RE: TAMPA ELECTRIC COMPANY'S PETITION FOR AN INCREASE IN BASE RATES AND MISCELLANEOUS SERVICE CHARGES


# DIRECT TESTIMONY AND EXHIBIT OF 

ROBERT B. HEVERT ON BEHALF OF TAMPA ELECTRIC COMPANY

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION <br> PREPARED DIRECT TESTIMONY <br> OF

ROBERT B. HEVERT
ON BEHALF OF TAMPA ELECTRIC COMPANY
I. INTRODUCTION
Q. Please state your name, affiliation and business address.
A. My name is Robert B. Hevert. I am Managing Partner of Sussex Economic Advisors, LLC ("Sussex"). My business address is 161 Worcester Road, Suite 503, Framingham, Massachusetts 01701.
Q. On whose behalf are you submitting this direct testimony?
A. I am submitting this direct testimony before the Florida Public Service Commission ("Commission") on behalf of Tampa Electric Company, referred to throughout my testimony as "Tampa Electric," or the "Company."
Q. Please describe your educational background.
A. I hold a Bachelor's degree in Business and Economics from the University of Delaware, and an MBA with a
concentration in Finance from the University of Massachusetts. I also hold the Chartered Financial Analyst designation.
Q. Please describe your experience in the energy and utility industries.
A. I have worked in regulated industries for over 25 years, having served as an executive and manager with consulting firms, a financial officer of a publicly-traded natural gas utility (at the time, Bay State Gas Company), and an analyst at a telecommunications utility. In my role as a consultant, $I$ have advised numerous energy and utility clients on a wide range of financial and economic issues including corporate and asset-based transactions, asset and enterprise valuation, transaction due diligence, and strategic matters. As an expert witness, I have provided testimony in approximately 100 proceedings regarding various financial and regulatory matters before numerous state utility regulatory agencies and the Federal Energy Regulatory Commission. A summary of my professional and educational background, including a list of my testimony in prior proceedings, is included in Attachment $A$ to my direct testimony.
II. PURPOSE AND OVERVIEW OF TESTIMONY
Q. What is the purpose of your testimony?
A. The purpose of my direct testimony is to present evidence and provide the Commission with a recommendation regarding the Company's return on equity ("ROE")" and to provide my determinations and opinions regarding the reasonableness of Tampa Electric's capital structure. My analyses and conclusions are supported by the data presented in Document Nos. 1 through 13 of my exhibit, which have been prepared by me or under my direction.
Q. What are your conclusions regarding the appropriate Cost of Equity for the Company?
A. My analyses indicate that the Company's Cost of Equity currently is in the range of 10.50 percent to 11.50 percent. Based on the quantitative and qualitative analyses discussed throughout my direct testimony, I conclude that the Cost of Equity for Tampa Electric is 11.25 percent.
Q. Please provide a brief overview of the analyses that led to your ROE recommendation.

Throughout my testimony, I interchangeably use the terms "ROE" and "Cost of Equity."
A. As discussed in more detail in Section VI, in light of recent market conditions, and given the fact that equity analysts and investors tend to use multiple methodologies in developing their return requirements, it is important to consider the results of several analytical approaches in determining the Company's ROE. In order to develop my ROE recommendation, I therefore applied the Constant Growth Discounted Cash Flow ("DCF") model, the Capital Asset Pricing Model ("CAPM"), and the Bond Yield Plus Risk Premium ("Risk Premium") approach. In addition to those analyses, it is important to consider a range of factors, both quantitative and qualitative, in arriving at an ROE determination.

In addition to the methodologies noted above, my recommendation also takes into consideration: (l) the incremental risks associated with the Company's need to fund substantial capital expenditures; and (2) flotation costs associated with equity issuances. While I did not make any explicit adjustments to my ROE estimates for those factors, I did take them into consideration in determining the Company's Cost of Equity.
Q. How is the remainder of your direct testimony organized?
A. The remainder of my direct testimony is organized as follows:

Section III - Provides a summary of my conclusions and recommendations;

Section IV - Discusses the regulatory guidelines and financial considerations pertinent to the development of the cost of capital;

Section V_- Explains my selection of the proxy group of electric utilities used to develop my analytical results;

Section VI - Explains my analyses and the analytical bases for my ROE recommendation;

Section VII - Provides a discussion of specific business risks that have a direct bearing on the Company's Cost of Equity;

Section VIII - Highlights the current capital market conditions and the effect of those conditions on the Company's Cost of Equity;

Section IX - Addresses the reasonableness of the Company's proposed capital structure; and

Section X - Summarizes my conclusions and recommendations.
III. SUMMARY OF CONCLUSIONS
Q. What are the key factors considered in your analyses and
upon which you base your recommended ROE?
A. My analyses and recommendations considered the following:

- The Hope and Bluefield decisions ${ }^{2}$ that established the standards for determining a fair and reasonable allowed return on equity including: consistency of the allowed return with other businesses having similar risk; adequacy of the return to provide access to capital and support credit quality; and that the end result must lead to just and reasonable rates.
- The effect of the current capital market conditions on investors' return requirements, and in particular, the Company's accelerating need to access the capital markets.
- The Company's business risks relative to the proxy group of comparable companies and the implications of those risks in arriving at the appropriate ROE.
Q. What are the results of your analyses?
A. The results of my analyses are summarized in Document No. 1 of my exhibit. Based on the analytical results, and in light of the considerations discussed throughout the balance of my direct testimony regarding the Company's business risks relative to the proxy group, it is my view

[^0]that a reasonable range of estimates is from 10.50 percent to 11.50 percent, and within that range, I conclude that the Cost of Equity for Tampa Electric is 11.25 percent.
IV. REGULATORY GUIDELINES AND FINANCIAI CONSIDERATIONS
Q. Please provide a brief summary of the guidelines established by the United States Supreme Court (the "Court") for the purpose of determining the Return on Equity.
A. The Court established the guiding principles for establishing a fair return for capital in two cases: (1) Bluefield Water Works and Improvement Co. v. Public Service Comm'n of West Virginia ("Bluefield"); and
(2) Federal Power Comm'n v. Hope Natural Gas Co.
("Hope"). In Bluefield, the Court stated:
A public utility is entitled to such rates as will permit it to earn a return on the value of the property which it employs for the convenience of the public equal to that generally being made at the same time and in the same general part of the country on investments in other business undertakings which are attended by corresponding risks and
uncertainties; but it has no constitutional right to profits such as are realized or anticipated in highly profitable enterprises or speculative ventures. The return should be reasonably sufficient to assure confidence in the financial soundness of the utility and should be adequate, under efficient and economical management, to maintain and support its credit and enable it to raise the money necessary for the proper discharge of its public duties. ${ }^{3}$

The Court, therefore, has recognized that: (1) a regulated public utility cannot remain financially sound unless the return it is allowed to earn on its invested capital is at least equal to the cost of capital (the principle relating to the demand for capital; and (2) a regulated public utility will not be able to attract capital if it does not offer investors an opportunity to earn a return on their investment equal to the return they expect to earn on other investments of similar risk (the principle relating to the supply of capital).

In Hope, the Court reiterated the financial integrity and capital attraction principles of the Bluefield case:

[^1]From the investor or company point of view it is important that there be enough revenue not only for operating expenses but also for the capital costs of the business. These include service on the debt and dividends on the stock. By that standard, the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks. That return, moreover, should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain its credit and to attract capital. ${ }^{4}$

In summary, the Court clearly has recognized that the fair rate of return on equity should be: (1) comparable to returns investors expect to earn on other investments of similar risk; (2) sufficient to assure confidence in the Company's financial integrity; and (3) adequate to maintain and support the Company's credit and to attract capital.
Q. Does the Florida Commission provide similar guidance?
A. Yes, the Commission upholds the precedents of the Hope

[^2]and Bluefield cases. In numerous cases, including Tampa Electric's most recent rate proceeding, the Commission found that the authorized ROE "satisfies the standards set forth in the Hope and Bluefield decisions of the U.S. Supreme Court regarding a fair and reasonable return for the provision of regulated service." ${ }^{5}$
Q. Aside from the standards established by the Commission and the courts, is it important for a public utility to be allowed the opportunity to earn a return that is adequate to attract equity capital at reasonable terms?
A. Yes, it is. A return that is adequate to attract capital at reasonable terms, under varying market conditions, will enable the subject utility to provide safe and reliable electric service while maintaining its financial integrity. While the "capital attraction" and "financial integrity" standards are important principles in normal economic conditions, the practical implications of those standards are even more pronounced when, as with Tampa Electric, the subject company has substantial capital expenditure plans. As discussed in more detail in Section VIII, sustained increases in the incremental spread on utility debt (i.e., the difference in debt yields of utilities varying credit ratings) has

[^3]intensified the importance of maintaining a strong financial profile; the incremental cost of a downgrade in bond rating is more expensive now than it historically has been. ${ }^{6}$ Consequently, preserving Tampa Electric's current credit profile is an important consideration in enabling the Company to access the capital markets, as needed and at reasonable cost rates.

## V. PROXI GROUP SELECTION

Q. As a preliminary matter, why is it necessary to select a group of proxy companies to determine the Cost of Equity for Tampa Electric?
A. It is important to bear in mind that the Cost of Equity for a given enterprise depends on the risks attendant to the business in which the company is engaged. According to financial theory, the value of a given company is equal to the aggregate market value of its constituent business units. The value of the individual business units reflects the risks and opportunities inherent in the business sectors in which those units operate. In this proceeding, we are focused on estimating the Cost of Equity for Tampa Electric, which is an operating subsidiary of TECO Energy, Inc. ("TECO Energy"). Since the ROE is a market-based concept and Tampa Electric is

[^4]not a publicly traded entity, it is necessary to establish a group of companies that are both publicly traded and reasonably comparable to the Company in certain fundamental respects to serve as its "proxy" in the ROE estimation process.

Even if Tampa Electric were a publicly traded entity, it is possible that short-term events could bias its market value in one way or another during a given period of time. A significant benefit of using a proxy group, therefore, is that it serves to moderate the effects of anomalous, temporary events that may be associated with any one company.
Q. Does the selection of a proxy group suggest that analytical results will be tightly clustered around average (i.e., mean) results?
A. Not necessarily. The DCF approach is based on the theory that a stock's current price represents the present value of its future expected cash flows. The Constant Growth form of the DCF model is defined as the sum of the expected dividend yield and projected long-term growth. Notwithstanding the care taken to ensure risk comparability, market expectations with respect to future
risks and growth opportunities will vary from company to company. Therefore, even within a group of similarly situated companies, it is common for analytical results to reflect a seemingly wide range. At issue, then, is how to estimate a company's ROE from within that range. That determination necessarily must be based on the informed judgment and experience of the analyst.
Q. Please provide a summary profile of Tampa Electric.
A. Tampa Electric provides electric generation, transmission and distribution services in West Central Florida to approximately 687,000 customers. ${ }^{7}$ Tampa Electric's current long-term issuer credit ratings are BBB+ (outlook: Stable) by S\&P, A3 (outlook: Stable) by Moody's Investors Service ("Moody's"), and BBB+ (outlook: Stable) by Fitch. Tampa Electric's current senior unsecured credit ratings are $B B B+$ by $S \& P, A 3$ by Moody's, and $A-$ by Fitch. ${ }^{8}$
Q. How did you select the companies included in your proxy group?
A. With the objective of selecting a proxy group that is highly representative of the risks and prospects faced by See TECO Energy Inc., 2012 SEC Form 10-K, at 5. Source: SNL Financial.

Tampa Electric, I used the following criteria:

- I began with the universe of companies that Value Line classifies as Electric Utilities, which includes a group of 49 domestic U.S. utilities;
- I excluded companies that do not consistently pay quarterly cash dividends;
- All of the companies in my proxy group have been covered by at least two utility industry equity analysts;
- All of the companies in my proxy group have investment grade senior bond and/or corporate credit ratings from $S \& P ;$
- I only selected proxy companies that are vertically integrated utilities (i.e., utilities that own and operate regulated generating assets);
- I excluded companies whose regulated operating income over the three most recently reported fiscal years comprised less than 60.00 percent of the respective totals for that company;
- I excluded companies whose regulated electric operating income over the three most recently reported fiscal years represented less than 90.00 percent of total regulated operating income;
- I excluded companies whose coal-fired generation
constituted less than 10.00 percent of net generation; and
- I eliminated companies that are currently known to be party to a merger, or other significant transaction.
Q. Did you include TECO Energy in your analysis?
A. No, in order to avoid the circular logic that otherwise would occur, it has been my consistent practice to exclude the subject company (or its parent) from the proxy group.
Q. What companies met those screening criteria?
A. The criteria discussed above resulted in an initial proxy group of the following thirteen companies: American Electric Power Company, Inc.; Cleco Corporation; Edison International; Empire District Electric Company; Great Plains Energy Inc.; IDACORP, Inc.; Integrys Energy Group, Inc.; Otter Tail Corporation; Pinnacle West Capital Corp.; PNM Resources, Inc.; Portland General Electric Company; Southern Company; and Westar Energy, Inc.
Q. Is this your final proxy group?
A. No, it is not. I examined the operating profile of each of the thirteen companies that met my initial screens to be certain that none displayed characteristics that were inconsistent with my intent to produce a proxy group that is fundamentally similar to the Tampa Electric. As a result, I excluded two companies based on recently published 2011 financial information. First, Edison International experienced significant unregulated operating losses in 2009 and 2011. In 2009, those operating losses were the result of a global tax settlement and payment to the Internal Revenue Service ("IRS"), which caused the company's unregulated marketing and trading segment to incur over $\$ 1.00$ billion in payments to settle a claim with the IRS. $^{9}$ In 2011, Edison International recorded a loss of $\$ 1.09$ billion in its competitive power generation segment ${ }^{10}$ resulting from an after-tax earnings charge (recorded in the fourth quarter of 2011) relating to the impairment of its Homer City, Fisk, Crawford and Waukegan power plants, wind related charges, and other expenses. ${ }^{11}$ Lastly, on December 17, 2012, Edison Mission Energy, a wholly owned subsidiary of Edison International, filed for bankruptcy protection under Chapter 11 of the U.S. Bankruptcy Code. ${ }^{12}$

In addition, Integrys Energy Group, Inc. ("Integrys")

[^5]experienced a 2009 operating loss of $\$ 114.6$ million in its Natural Gas Utility Segment due primarily to a non-cash goodwill impairment loss of $\$ 284.6$ million. ${ }^{13}$ Given that (1) Integrys' operating results since 2009 indicate that its gas utility operations consistently comprise approximately 50.00 percent of total regulated income, and (2) the company's 2009 results may not necessarily reflect its current and future operations, I have excluded Integrys from the proxy group.
Q. Based on the criteria and issues discussed above, what is the composition of your proxy group?
A. The final proxy group is comprised of the following eleven companies: American Electric Power Company, Inc.; Cleco Corporation; Empire District Electric Company; Great Plains Energy Inc.; IDACORP, Inc.; Otter Tail Corporation; Pinnacle West Capital Corp.; PNM Resources, Inc.; Portland General Electric Company; Southern Company; and Westar Energy, Inc.

## VI. COST OF EQUITY ESTIMATION

Q. Please briefly discuss the ROE in the context of the regulated rate of return.

[^6]A. In Florida, regulated utilities use common stock, long-term debt, and other sources of capital to finance their permanent property, plant, and equipment. The overall rate of return ("ROR") for a regulated utility is based on its weighted average cost of capital, in which the cost rates of the individual sources of capital are weighted by their respective book values. While the cost of debt and other sources of capital can be directly observed, the Cost of Equity is market-based and, therefore, must be estimated based on observable market information.
Q. How is the required ROE determined?
A. The required ROE is estimated by using one or more analytical techniques that rely on market-based data to quantify investor expectations regarding required equity returns, adjusted for certain incremental costs and risks. By their very nature, quantitative models produce a range of results from which the market required ROE must be estimated. As discussed throughout my direct testimony, that estimation must be based on a comprehensive review of relevant data and information. This estimation does not necessarily lend itself to a strict mathematical solution. Consequently, the key
consideration in determining the Cost of Equity is to ensure that the methodologies employed reasonably reflect investors' view of the financial markets in general and the subject company (in the context of the proxy group) in particular.
Q. What methods did you use to estimate the Company's Cost of Equity?
A. I used the Constant Growth DCF model as my initial approach and considered the results of the CAPM and Risk Premium approach in developing my ROE recommendation. In light of the capital market conditions discussed in Section VIII, I have relied primarily on the Constant Growth DCF model, and used the CAPM and Risk Premium approaches as corroborating methodologies in arriving at my ROE recommendation.
Q. Why do you believe it is important to use more than one analytical approach?
A. Because the Cost of Equity is not directly observable, it must be estimated based on both quantitative and qualitative information. As a result, a number of models have been developed to estimate the Cost of Equity. As a
practical matter, however, all of the models available for estimating the Cost of Equity are subject to limiting assumptions or other methodological constraints. Consequently, many finance texts recommend using multiple approaches when estimating the Cost of Equity. ${ }^{14}$ When faced with the task of estimating the Cost of Equity, analysts and investors are inclined to gather and evaluate as much relevant data as reasonably can be analyzed and, therefore, are inclined to rely on multiple analytical approaches.

In essence, practitioners and academics recognize that financial models simply are tools to be used in the ROE estimation process, and that strict adherence to any single approach, or to the specific results of any single approach, can lead to flawed or misleading conclusions. That position is consistent with the Hope and Bluefield principle that it is the analytical result, as opposed to the methodology, that is controlling in arriving at ROE determinations. Thus, a reasonable ROE estimate appropriately considers alternate methodologies and the reasonableness of their individual and collective results.

Consequently, it is both prudent and appropriate to use Valuation: Measuring and Managing the Value of Companies, 3rd ed., 2000, at 214.
multiple methodologies in order to mitigate the effects of assumptions and inputs associated with relying exclusively on any single approach. Such use, however, must be tempered with due caution as to the results generated by each individual approach.

## Constant Growth DCF Model

Q. Are DCF models widely used in regulatory proceedings?
A. Yes, in my experience the Constant Growth DCF model is widely recognized in regulatory proceedings, as well as in financial literature. Nonetheless, neither the DCF nor any other model should be applied without considerable judgment in the selection of data and the interpretation of results.
Q. Please describe the DCF approach.
A. The DCF approach is based on the theory that a stock's current price represents the present value of all expected future cash flows. In its simplest form, the DCF model expresses the Cost of Equity as the sum of the expected dividend yield and long-term growth rate, and is expressed as follows:

$$
\begin{equation*}
P=\frac{D_{1}}{(1+k)}+\frac{D_{2}}{(1+k)^{2}}+\cdots+\frac{D_{\infty}}{(1+k)^{\infty}} \tag{1}
\end{equation*}
$$

where $P$ represents the current stock price, $D_{1} \ldots D_{\infty}$ represent expected future dividends, and $k$ is the discount rate, or required ROE. Equation [1] is a standard present value calculation that can be simplified and rearranged into the familiar form:

$$
\begin{equation*}
k=\frac{D_{0}(1+g)}{P}+g \tag{2}
\end{equation*}
$$

Equation [2] often is referred to as the "Constant Growth DCF" model, in which the first term is the expected dividend yield and the second term is the expected long-term annual growth rate.
Q. What assumptions are inherent in the Constant Growth DCF model?
A. The Constant Growth DCF model assumes: (1) a constant average annual growth rate for earnings and dividends; (2) a stable dividend payout ratio; (3) a constant price-to-earnings multiple; and (4) a discount rate greater than the expected growth rate.
Q. What market data did you use to calculate the dividend
yield component of your DCF model?
A. The dividend yield is based on the proxy companies' current annualized dividend, and average closing stock prices over the 30,90 , and $180-t r a d i n g$ day periods as of February 15, 2013.
Q. Why did you use three averaging periods to calculate an average stock price?
A. I did so to ensure that the model's results are not skewed by anomalous events that may affect stock prices on any given trading day. At the same time, the averaging period should be reasonably representative of expected capital market conditions over the long term. In my view, the use of the 30-, 90-, and 180-day averaging periods reasonably balances those concerns.
Q. Did you make any adjustments to the dividend yield to account for periodic growth in dividends?
A. Yes, I did. Since utility companies tend to increase their quarterly dividends at different times throughout the year, it is reasonable to assume that dividend increases will be evenly distributed over calendar
quarters. Given that assumption, it is appropriate to calculate the expected dividend yield by applying onehalf of the long-term growth rate to the current dividend yield. That adjustment ensures that the expected dividend yield is, on average, representative of the coming twelve-month period, and does not overstate the dividends to be paid during that time.
Q. Is it important to select appropriate measures of longterm growth in applying the DCF model?
A. Yes. In its Constant Growth form, the DCF model (i.e., as presented in Equation [2] above on page 22 of my direct testimony) assumes a single growth estimate in perpetuity. In order to reduce the long-term growth rate to a single measure, one must assume a constant payout ratio, and that earnings per share, dividends per share, and book value per share all grow at the same constant rate. Over the long term, however, dividend growth can only be sustained by earnings growth. It is important, therefore, to incorporate a variety of measures of longterm earnings growth into the Constant Growth DCF model.
Q. Please summarize your inputs to the Constant Growth DCF model.

15 See Document No. 2.
A. I applied the DCF model to the proxy group of integrated electric utility companies using the following inputs for the price and dividend terms:

1. The average daily closing prices for the 30 -trading days, 90 -trading days, and 180-trading days ended February 15, 2013, for the term $P_{0}$; and
2. The annualized dividend per share as of February 15, 2013, for the term $D_{0}$.

I then calculated my DCF results using each of the following growth terms:

1. The Zacks consensus long-term earnings growth estimates;
2. The First Call consensus long-term earnings growth estimates; and
3. The Value Line long-term earnings growth estimates.
Q. How did you calculate the high and low DCF results?
A. I calculated the proxy group mean and median high DCF results using the maximum EPS growth rate as reported by Value Line, Zack's, and First Call for each proxy group company in combination with the dividend yield for each of the proxy group companies. The proxy group mean and median high results then reflect the average maximum DCF
result for the proxy group as a whole. I used a similar approach to calculate the proxy group mean and median low results using instead the minimum growth rate as reported by Value Line, Zack's, and First Call for each proxy group company. However, the mean and median low results are below reasonable estimates of investors' required rate of return for investment in vertically integrated electric utilities of comparable risk to Tampa Electric. Of the 1,392 rate cases since 1980 that disclosed the awarded ROE, for example, only one included an authorized ROE of 9.00 percent or lower. ${ }^{16}$ On that basis alone, the mean low results are highly improbable. As such, I did not give those estimates any weight in arriving at my ROE range and recommendation.
Q. What are the results of your DCF analysis?
A. My Constant Growth DCF results are summarized in Document No. 2 of my exhibit. The mean DCF results for my proxy group are 10.60 percent, 10.69 percent, and 10.70 percent for the $30-$, $90-$, and 180 -trading day periods, respectively. The median DCF results for my proxy group are 10.84 percent, 10.86 percent, and 10.81 percent for the 30-, 90-, and 180-trading day periods, respectively. The mean high DCF results for the 30-, 90-, and 180-day

16 See Document No. 6.
averaging periods are 13.09 percent, 13.18 percent, and 13.19 percent, respectively; and the median high DCF results for the $30-$, $90-$, and 180 -day averaging periods are 11.45 percent, 11.47 percent, and 11.42 percent, respectively. ${ }^{17}$
Q. Did you undertake any additional analyses to support your recommendation?
A. Yes. As noted earlier, $I$ also applied the CAPM and Risk Premium analysis as corroborating methodologies in arriving at my ROE recommendation.

## CAPM Analysis

Q. Please briefly describe the general form of the CAPM analysis.
A. The CAPM analysis is a risk premium approach that estimates the Cost of Equity for a given security as a function of a risk-free return plus a risk premium (to compensate investors for the non-diversifiable or "systematic" risk of that security). As shown in Equation [3], the CAPM is defined by four components, each of which theoretically must be a forward-looking estimate:

17 DCF results are unadjusted (i.e., prior to any adjustment for flotation costs).

$$
\begin{equation*}
k=r_{f}+\beta\left(r_{m}-r_{f}\right) \tag{3}
\end{equation*}
$$

Where:
$k=$ the required market ROE ;
$\beta=$ Beta coefficient of an individual security;
$r_{f}=$ the risk-free rate of return; and
$r_{m}=$ the required return on the market as a whole.

In Equation [3], the term ( $r_{m}-r_{f}$ ) represents the Market Risk Premium. ${ }^{18}$ According to the theory underlying the CAPM, since unsystematic risk can be diversified away by adding securities to their investment portfolio, investors should be concerned only with systematic or non-diversifiable risk. Non-diversifiable risk is measured by the Beta coefficient, which is defined as:

$$
\beta_{j}=\frac{\sigma_{j}}{\sigma_{m}} x \rho_{j, m}
$$

where $\sigma_{j}$ is the standard deviation of returns for company "j," $\sigma_{m}$ is the standard deviation of returns for the broad market (as measured, for example, by the $S \& P 500$ Index), and $\rho_{j, m}$ is the correlation of returns in between company $j$ and the broad market. Thus, the Beta coefficient represents both relative volatility (i.e., the standard deviation) of returns, and the correlation in returns between the subject company and the overall market.
${ }^{18}$ The Market Risk Premium is defined as the incremental return of the market over the risk-free rate.
Q. Has the CAPM been affected by recent economic conditions?
A. Yes, recent economic conditions have affected all three components of the model. First, as noted above, the risk-free rate, " $r_{f}$," in the CAPM formula is represented by the yield on long-term U.S. Treasury securities. As discussed in Section VIII (below), during periods of increased equity market volatility investors tend to allocate their capital to low-risk securities such as Treasury bonds. In addition, since the 2008 Lehman Brothers bankruptcy filing, the Federal Reserve has focused on maintaining low long-term interest rates. Consequently, the first term in the model (i.e. the riskfree rate) is lower than it would have been absent the elevated degree of risk aversion and government intervention that has, at least in part, resulted in historically low Treasury yields.

However, the capital markets continue to change, by some measures quite significantly. For example, in the 90 trading days ended February 15, 2013, the 30-year Treasury yield ranged from a low of 2.72 percent to a high of 3.23 percent. ${ }^{19}$ In that regard, it is important to recognize that several capital market indices may continue to be quite volatile.

30 -year Treasury yield range is based on daily data reported by the Federal Reserve at www.federalreserve.gov

Finally, as a result of the extraordinary loss in equity values during 2008, the Market Risk Premium, when measured on a historical basis, actually decreased from the prior year, even though other measures of risk sentiment, in particular market volatility, indicated extremely high levels of risk aversion. That result is, of course, counter-intuitive. While the subsequent market rally resulted in a somewhat higher historical average Market Risk Premium, it still remains below its pre-financial crisis level.
Q. With those observations in mind, what assumptions did you include in your CAPM analysis?
A. Since utility assets represent long-term investments, I used three different estimates of the risk-free rate component of the CAPM analysis: (1) the current 30-day average yield on 30-year Treasury bonds (i.e., 3.12 percent); (2) the near-term projected 30-year Treasury yield (i.e., 3.25 percent); and (3) the long-term projected 30 -year Treasury yield (i.e., 5.10 percent). ${ }^{21}$
Q. What Market Risk Premium did you use in your CAPM analysis?

[^7]A. For the reasons discussed above, $I$ did not use a historical average; rather, I developed two forwardlooking (ex-ante) estimates of the Market Risk Premium.
Q. Please describe your first ex-ante approach to estimating the Market Risk Premium.
A. The first approach is based on the market required return, less the current 30 -year Treasury bond yield. To estimate the market required return, I calculated the market capitalization weighted average ROE based on the Constant Growth DCF model. To do so, I relied on data from two sources: (1) Bloomberg and (2) Capital IQ. For both Bloomberg and Capital IQ, I calculated the market capitalization weighted expected dividend yield (using the same one-half growth rate assumption described earlier) and combined that amount with the market capitalization weighted projected earnings growth rate to arrive at the market capitalization weighted average DCF result. I then subtracted the current 30-year Treasury yield from that amount to arrive at the market DCFderived ex-ante Market Risk Premium estimate. The results of those two calculations are provided in Document No. 3 of my exhibit.
Q. Please now describe the second ex-ante approach.
A. The second approach is based on the fundamental financial principle that investors require higher returns as compensation for higher risk. In essence, this approach uses market-based data to determine whether investors expect future risk to be higher, lower, or approximately equal to historical market risk. To the extent the market expects risk to be higher than historical levels, the Market Risk Premium would be higher than historical levels; the converse also is true.

In terms of its application, this approach relies on the Sharpe Ratio, which is the ratio of the long-term average Risk Premium for the S\&P 500 Index, to the risk of that index. ${ }^{22}$ The formula for calculating the Sharpe Ratio is expressed as follows:

$$
\begin{equation*}
S_{x}=\frac{\left(R_{x}-R_{f}\right)}{\sigma_{x}} \tag{5}
\end{equation*}
$$

where:

$$
\begin{aligned}
& S_{x}=\text { Sharpe Ratio for security " } x \text { "; } \\
& R_{x}=\text { the average return of " } x \text { "; } \\
& R_{f}=\text { the rate of return of a risk-free security; and } \\
& \sigma_{x=}=\text { the standard deviation of } r_{x} .
\end{aligned}
$$

As shown in Document No. 3 of my exhibit, the constant

[^8]Sharpe Ratio is the ratio of the historical Market Risk Premium of 6.60 percent $^{23}$ (the numerator of Equation [5] above) and the historical market volatility of 20.30 percent (the denominator of Equation [5]). ${ }^{24}$ The expected Market Risk Premium is then calculated as the product of the Sharpe Ratio and the expected market volatility. For the purpose of that calculation, I used the 30-day average of the Chicago Board Options Exchange's ("CBOE") three-month volatility index (i.e., the VXV) and the average of settlement prices over the same 30 -day period of futures on the CBOE's one-month volatility index (i.e., the VIX) for July 2013 through September 2013. Both of those indices are market-based, observable measures of investors' expectations regarding future market volatility.
Q. How did you apply your expected Market Risk Premium and risk-free rate estimates?
A. I relied on each of the ex-ante Market Risk Premia discussed above, together with the current, near-term projected, and long-term projected 30 -year Treasury bond yields as inputs to my CAPM analyses.
Q. What Beta coefficients did you use in your CAPM model?
${ }^{23}$ The historical Market Risk Premium is provided by Morningstar as the average Risk Premium over the period 1926 through 2011 (See, Morningstar Inc., Ibbotson SBBI 2012. Valuation Yearbook, Large Company Stocks: Total Returns Table A-1, at 128-133).
The standard deviation is calculated from data provided by Morningstar in its annual Valuation Yearbook. (See, Morningstar Inc., Ibbotson SBBI 2012 Valuation Yearbook, Large Company Stocks: Total Returns Table B-l, at 162-163). I recognize that the VIX forward settlement prices are liquid for approximately six to eight months; nonetheless, that data represents a market-based measure of expected volatility that should be considered in estimating the ex-ante Market Risk Premium.
A. My approach includes the average reported Beta coefficient from Bloomberg and Value Line for each of the proxy group companies. ${ }^{25}$ While both of those services adjust their calculated (or "raw") Beta coefficients to reflect the tendency of the Beta coefficient to regress to the market mean of 1.00 , Value Line calculates the Beta coefficient over a five-year period, while Bloomberg's calculation is based on two years of data.
2. What are the results of your CAPM analyses?
A. The results of my CAPM analysis are summarized in Document No. 5 of my exhibit. Relying on the Bloomberg estimates of the Beta coefficient, the results of my CAPM analysis suggest a range of returns from 7.42 percent to 12.16 percent with a mean result of 9.95 percent. Applying the Value Line estimates of the Beta coefficient, the results of my CAPM analysis produces a range of results from 7.45 percent to 12.20 percent with a mean result of 9.98 percient.
Q. Do you believe the CAPM results provide a reasonable range of ROE estimates at this time?
A. Not entirely. As a practical matter, the low results are 25 See Document No. 4.
approximately 100 basis points below the lowest ROE ever authorized for an electric utility in at least 30 years. By that measure, the mean low results simply are not reasonable. As to the remaining results, as $I$ discuss in Section VIII of my direct testimony, the intended consequence of continued Federal Reserve intervention in the capital markets has been to maintain long-term Treasury yields at historically low levels. Since the CAPM defines the Cost of Equity in terms of Treasury yields, the effect of those actions is to decrease, rather substantially, the CAPM estimates. The effect of that policy, however, will not continue indefinitely; consensus forecasts call for the 30 -year Treasury yield to increase to 4.70 percent (from the current level of approximately 3.00 percent) in the $2014-2018$ timeframe. ${ }^{26}$

Regarding the Sharpe Ratio Derived Market Risk Premium in particular, while measures of volatility are currently below the long-term average VIX, data based on the CBOE VIX Term Structure, which provides a longer-term view, suggests investors expect volatility to increase over the next two years, suggesting a higher cost of Equity. On balance, then, I do not believe that the CAPM results fully reflect the appropriate range of ROE estimates.
${ }^{26}$
See Blue Chip Financial Forecasts, Vol. 32, No. 12, December 1, 2012, at 14.

## Bond Yield Plus Risk Premium Approach

Q. Please generally describe the Bond Yield Plus Risk Premium approach.
A. In general terms, this approach is based on the fundamental principle that equity investors bear the residual risk associated with ownership and therefore require a premium over the return they would have earned as a bondholder. That is, since returns to equity holders are more risky than returns to bondholders, equity investors must be compensated for bearing that risk. Risk premium approaches, therefore, estimate the cost of equity as the sum of the Equity Risk Premium ${ }^{27}$ and the yield on a particular class of bonds. As noted in my discussion of the CAPM, since the Equity Risk Premium is not directly observable, it typically is estimated using a variety of approaches, some of which incorporate exante, or forward-looking estimates of the cost of equity, and others that consider historical, or ex-post, estimates. An alternative approach is to use actual authorized returns for electric utilities to estimate the Equity Risk Premium.
Q. Please explain how you performed your Bond Yield Plus Risk Premium analysis.

[^9]A. As discussed above, $I$ first defined the Risk Premium as the difference between the authorized ROE and the thenprevailing level of long-term (i.e., 30-year) Treasury yield. I also calculated the average period between the filing of the case and the date of the final order (the "lag period"). In order to reflect the prevailing level of interest rates during the pendency of the proceedings, I calculated the average 30 -year Treasury yield over the average lag period (approximately 201 days).

Because the data covers a number of economic cycles, ${ }^{28}$ the analysis also may be used to assess the stability of the Equity Risk Premium. Prior research, for example, has shown that the Equity Risk Premium is inversely related to the level of interest rates. ${ }^{29}$ That analysis is particularly relevant given the historically low level of current Treasury yields.
Q. How did you model the relationship between interest rates and the Equity Risk Premium?
A. The basic method used was regression analysis, in which the observed Equity Risk Premium is the dependent variable, and the average 30 -year Treasury yield is the independent variable. Relative to the long-term
28 See National Bureau of Economic Research, U.S. Business Cycle Expansion and Contractions.
See, e.g., Robert S. Harris and Felicia C. Marston, Estimating Shareholder Risk Premia Using Analysts' Growth Forecasts, Financial Management, Sumer 1992, at 63-70; Eugene F. Brigham, Dilip K. Shome, and Steve R. Vinson, The Risk Premium Approach to Measuring a Utility's Cost of Equity, Financial Management, Spring 1985, at 33-45; and Farris M. Maddox, Donna T. Pippert, and Rodney N. Sullivan, An Empirical Study of Ex Ante Risk Premiums for the Electric Utility Industry, Financial Management, Autumn 1995, at 89-95.
historical average, the analytical period includes interest rates and authorized ROEs that are quite high during one period (i.e., the 1980s) and that are quite low during another (the post-Lehman bankruptcy period). Therefore, to account for this variability $I$ used the semi-log regression, in which the Equity Risk Premium is expressed as a function of the natural log of the 30 -year Treasury yield:

$$
R P=\alpha+\beta\left(\operatorname{LN}\left(T_{30}\right)\right)[6]
$$

As shown on Document No. 6 of my exhibit, the semi-log form is useful when measuring an absolute change in the dependent variable (in this case, the Risk Premium) relative to a proportional change in the independent variable (the 30-year Treasury yield).

As Document No. 6 of my exhibit illustrates, since 1980 there has been a statistically significant, negative relationship between the 30 -year Treasury yield and the Equity Risk Premium. Consequently, simply applying the long-term average Equity Risk Premium of 4.39 percent (see Document No. 6 of my exhibit) would significantly understate the Cost of Equity and produce results well below any reasonable estimate. Based on the regression
coefficients in Document No. 6 of my exhibit, however, the implied ROE is between 10.23 percent and 10.76 percent (see Document No. 6 of my exhibit). In any event, the analysis demonstrates that there has been a significant inverse relationship between the 30-year Treasury yield and the Equity Risk Premium.

## VII. BUSINESS RISKS AND OTHER CONSIDERATIONS

Q. Do the mean DCF and CAPM results for the proxy group provide an appropriate estimate of the Cost of Equity for Tampa Electric?
A. No, the mean results do not necessarily provide an appropriate estimate of the Company's Cost of Equity. While the intent of selecting a proxy group is to select companies with similar risk profiles, future risks and growth opportunities will vary from company to company. Even within a group of similarly situated companies, it is common for analytical results to reflect a seemingly wide range of results. Therefore, in my view, there are several additional factors that must be taken into consideration when determining where the Company's Cost of Equity falls within the range of results. These factors include the Company's planned capital investment program, and the costs associated with the flotation of
common stock. These risk factors, which are discussed below, should be considered in terms of their overall effect on the Company's business risk.

## Planned Capital Expenditures

Q. Please briefly summarize the Company's capital investment plans.
A. Tampa Electric expects an annual average of approximately \$350 million in capital needs over the next five years to support system reliability and modest customer growth. In addition, the Company's Polk Power Station combined cycle conversion will require an additional $\$ 610$ million in capital expenditures. ${ }^{30}$ As described in the Direct Testimonies of Witnesses Mark J. Hornick, Jeffrey S. Chronister and S. Beth Young, Tampa Electric must finance improvements to its system and meet the other capital obligations required to operate a reliable and efficient electric system.
Q. Do credit rating agencies recognize risks associated with increased capital expenditures?
A. Yes, they do. From a credit perspective, the additional pressure on cash flows associated with high levels of 2013 granting determination of need for Polk 2-5 Combined Cycle Conversion.
capital expenditures exerts corresponding pressure on credit metrics and, therefore, credit ratings. $S \& P$ has noted several long-term challenges for utilities' financial health including heavy construction programs to address demand growth, declining capacity margins, and aging infrastructure and regulatory responsiveness to mounting requests for rate increases. ${ }^{31} \mathrm{~S} \& \mathrm{P}$ further noted that:

For regulated utilities, infrastructure spending leads to rate-base growth. But for a company to preserve its financial strength, it must be able to quickly begin recovering this spending.

With all these incremental investments, a perfect regulatory storm could arise if costs for fuel and purchased gas rise sharply at the same time that utilities need to raise rates to recover the costs related to infrastructure spending for mandated environmental upgrades, new generation construction, renewable requirements, or pipeline replacements. If this happens, regulators could decide to allow only partial recovery of incurred capital costs through rate increases to reduce rate spikes for customers and possibly defer the remaining RatingsDirect, June 27, 2008, at 4.

> balance. Because deferrals do not provide the cash flow needed for utilities to service their debt obligations, utility credit quality could be affected. To retain critical access to the debt markets, utilities will need to continue to seek and receive supportive cost recovery from regulators. 32

The rating agency views are consistent with certain observations discussed in Section VIII of my direct testimony: (1) the benefits of maintaining a strong financial profile are significant when capital access is required and become particularly acute during periods of market instability; and (2) the Commission's decision in this proceeding will have a direct bearing on the Company's credit profile and its ability to access the capital needed to fund its investments.
Q. Are equity investors also concerned with comparatively high levels of capital expenditures?
A. Yes, equity investors also recognize the pressure on cash flows associated with relatively high levels of capital expenditures. For example, KeyBanc Capital Markets ("KeyBanc") conducts a quarterly review of the electric

[^10] Vital, RatingsDirect, May 14, 2012, at 6.

> utility industry. In a recent report, KeyBanc noted that:

While recent prices may have come off of their earlier highs due to the global economic crisis slowing construction demand, we believe the long-term trend of rising construction materials costs could resume as the global economy rebounds. The cost of building new generation remains a moving target, as worldwide demand for construction materials commodities (steel, concrete and copper), labor and components (turbines and boilers) would remain fundamentally strong, driven by $a$ rebound in the U.S. and Chinese economies and required compliance with future U.S. environmental regulations. We believe this presents challenges to both unregulated and regulated investment in new generation plants. In particular, on the regulated side, there exists a chicken-and-egg problem in that securing pricing without a regulatory buy-in is as difficult as receiving regulatory preapproval without firm pricing. ${ }^{33}$
Q. Have you also considered the relationship between capital expenditures and the earned return on common equity?
A. Yes, I have. The "DuPont" formula decomposes the Return on Common Equity into three components: (1) the Profit Margin (net income/revenues); (2) Asset Turnover (revenues/net plant); and (3) the Equity Multiplier (net plant/equity). ${ }^{34}$ As Document No. 7 of my exhibit demonstrates, based on the Value Line Electric universe, the Asset Turnover rate declined from 2003 through 2011 (the historical period covered by Value Line) and is expected to decline further through Value Line's 2015 2017 projection period. Over that same period, according to Value Line data, average Net Plant experienced a cumulative increase of approximately 175.00 percent. Since, as noted above, the utility industry is going through a period of increased capital investment, the lag between the addition of net plant and revenue generated by those investments dilute the Asset Turnover ratio, at least in the near term.

In order to gain an additional perspective on the relationship between plant additions and Asset Turnover, I performed a regression analysis in which the annual change in the Asset Turnover rate was the dependent

34 . The Dupont formula is commonly used by financial analysts to monitor specific operational and financial drivers of a company's earned ROE. The formula expands the calculation of the ROE into the product of three financial metrics: Profit Margin, Asset Turnover and the Equity Multiplier. That is, ROE $=$ (earnings / revenue) $x$ (revenue / assets) $x$ (assets / equity).
variable, and the annual change in Net Plant was the independent variable. As shown in Document No. 7 of my exhibit, that analysis shows a statistically significant negative relationship between the two variables, such that as annual net plant increases, the Asset Turnover ratio decreases. This, in turn, suggests that an increase in capital expenditures also negatively affects the Return on Common Equity, causing greater financial stress to the utility. To the extent investors value a company based on earnings and cash flow, this additional financial strain is a key concern.
Q. What are your conclusions regarding the effect of the Company's capital spending plans on its risk profile?
A. It is clear that the Company's capital expenditure program is significant. It also is clear that the financial community recognizes the additional risks associated with substantial capital expenditures. In my view, these factors suggest an $R O E$ above the mean results of the Cost of Equity analyses.

## Flotation Costs

Q. What are flotation costs?
A. Flotation costs are the costs associated with the sale of new issues of common stock. These costs include out-ofpocket expenditures for preparation, filing, underwriting, and other costs of issuance of common stock.
Q. Why is it important to recognize flotation costs in the allowed return on equity?
A. In order to attract and retain new investors, a regulated utility must have the opportunity to earn a return that is both competitive and compensatory. To the extent that a company is denied the opportunity to recover prudently incurred flotation costs, actual returns will fall short of expected (or required) returns, thereby diminishing its ability to attract adequate capital on reasonable terms.
Q. Are flotation costs part of the utility's invested costs or part of the utility's expenses?
A. Flotation costs are part of the invested costs of the utility, which are properly reflected on the balance sheet under "paid in capital." They are not current expenses, and therefore are not reflected on the income
statement. Rather, like investments in rate base or the issuance costs of long-term debt, flotation costs are incurred over time. As a result, the great majority of a utility's flotation costs are incurred prior to the test year, but remain part of the cost structure that exists during the test year and beyond and, as such, should be recognized for ratemaking purposes. Therefore, recovery of flotation costs is appropriate even if no new issuances are planned in the near future because failure to allow such cost recovery may deny the Company the opportunity to earn its required rate of return in the future.
Q. Is the need to consider flotation costs eliminated because the Company is a subsidiary of TECO Energy?
A. No. Although the Company is a wholly-owned subsidiary of TECO Energy, it is appropriate to consider flotation costs because wholly-owned subsidiaries receive equity capital from their parents and provide returns on the capital that roll up to the parent, which is designed to attract and raise capital based on the returns of those subsidiaries. To deny recovery of issuance costs associated with the capital that is invested in the subsidiaries ultimately will penalize the investors that
fund the utility operations and will inhibit the utility's ability to obtain new equity capital at a reasonable cost.
Q. Does the DCF model or the CAPM already incorporate investor expectations of a return that compensates for flotation costs?
A. No. All the models used to estimate the appropriate ROE assume no "friction" or transaction costs, as these costs are not reflected in the market price (in the case of the DCF model) or risk premium (in the case of the CAPM). Therefore, it is appropriate to consider flotation costs when determining where within the range of reasonable results the Company's return should fall.
Q. Is the need to consider flotation costs recognized by the academic and financial communities?
A. Yes. Several economists have recognized that the flotation cost adjustment is made not to reflect current or future financing costs, but rather to compensate investors for costs incurred for all past issuances comprising the total equity portion of the Company's capitalization. An article in The Journal of Finance,
for example, observed that:

Under the conventional approach, in other words, the flotation cost adjustment is not made to reflect current or future financing costs... [I]t is made to compensate investors for costs incurred in preceding stock issues. ${ }^{35}$

The need to reimburse for equity issuance costs is justified by the academic and financial communities in the same spirit that investors are reimbursed for the costs of issuing debt. This treatment is consistent with the philosophy of a fair rate of return. According to Dr. Shannon Pratt, an expert in the field of business valuation:

Flotation costs occur when a company issues new stock. The business usually incurs several kinds of flotation or transaction costs, which reduce the actual proceeds received by the business. Some of these are direct out-ofpocket outlays, such as fees paid to underwriters, legal expenses, and prospectus preparation costs. Because of this reduction in proceeds, the business's required returns Comment, The Journal of Finance, Vol. XXXVIII, No. 4, September 1983, at 1337 [Clarification added].

> must be greater to compensate for the additional costs. Flotation costs can be accounted for either by amortizing the cost, thus reducing the net cash flow to discount, or by incorporating the cost into the cost of equity capital. typically are not applied to operating cash flow, they must be incorporated into the cost of equity capital. ${ }^{36}$
Q. How did you calculate the effect of flotation cost recovery?
A. I modified the DCF calculation to provide a dividend yield that would reimburse investors for direct issuance costs. My flotation cost calculation recognizes the direct costs of issuing equity that were incurred by TECO Energy and the proxy group companies in their most recent two common equity issuances. Based on the direct issuance costs provided in Document No. 8 of my exhibit, an adjustment of 0.14 percent (i.e., 14 basis points) reasonably represents the direct flotation costs for the Company. In addition to direct issuance costs, there is another indirect component to flotation costs that arises from the market pressure resulting from an increase in

[^11]the supply of stock. As described by Dr. Roger A. Morin:
As far as the market pressure effect is
concerned, empirical studies clearly show that
the market pressure effect is real, tangible,
and measureable. All studies support the idea
that the announcement of the sale of large
blocks of stock produces a decline in a
company's stock price, as one would expect given
the increased supply of common stock. ${ }^{37}$

As to the total flotation costs, "allowing for market pressure costs raises the flotation cost allowance for stock issues to well above $5 \%$."38 Based on a total flotation cost of 5.00 percent, an adjustment of 0.22 percent (i.e., 22 basis points) reasonably represents the total direct and indirect flotation costs for the Company.
Q. Has the Commission previously recognized the need to recover flotation costs?
A. The Commission recently recognized "there are costs incurred when a firm issues equity and those costs should be recovered within the ROE."39 In that case, the

[^12]Commission did not recognize a specific adjustment for flotation costs, but instead "[took] into consideration the witnesses' testimony and analyses regarding an allowance for flotation costs." 40
Q. Are you proposing to adjust your recommended ROE to reflect the effect of flotation costs on the Company's ROE?
A. Consistent with recent Commission practice, I am not proposing a specific adjustment. Rather, $I$ have considered the effect of flotation costs, in addition to the Company's other business risks, in determining where its ROE falls within the range of results.

## VIII. CAPITAL MARKET ENVIRONMENT

Q. Do economic conditions influence the required cost of capital and required return on common equity?
A. Yes. As discussed in Section VI, the models used to estimate the cost of Equity are meant to reflect, and therefore are influenced by, current and expected capital market conditions.
Q. Have you reviewed any specific indices to assess the 40 Ibid.
relationship between current market conditions and investor return requirements?
A. Yes, I considered several measures of capital market risk, including: (1) the relationship between treasury yields and the Cost of Equity; (2) incremental credit spreads on investment grade utility debt; and (3) the relationship between electric utility dividend yields and long-term Treasury yields. As discussed below, each of those measures provide information that is relevant to the implementation of models used to estimate the Cost of Equity, and in the interpretation of the model results.

Relationship Between Historically Low Treasury Yields and the Cost of Equity
Q. As a preliminary matter, has the cost of equity fallen in tandem with the recent decline in long-term treasury yields?
A. No, it has not. The fear of taking the risks of equity ownership, for example, has motivated many investors to move their capital into the relative safety of Treasury securities. In doing so, investors have bid down yields to the point that they currently are receiving yields on ten-year Treasury bonds that are below the rate of
inflation. ${ }^{41}$ In effect, those investors are willing to accept a negative real return on Treasury bonds rather than be subject to the risk of owning equity securities.

At the same time, the Federal Reserve's policy of buying longer-dated Treasury securities and selling short-term securities also may have had the effect of lowering longterm Treasury yields. That is, of course, the objective of the Federal Reserve's "maturity extension program" which began in September 2011. ${ }^{42}$ As the Federal Reserve noted:

Under the maturity extension program, the Federal Reserve intends to sell or redeem a total of $\$ 667$ billion of shorter-term Treasury securities by the end of 2012 and use the proceeds to buy longer-term Treasury securities. This will extend the average maturity of the securities in the Federal Reserve's portfolio.

By reducing the supply of longer-term Treasury securities in the market, this action should put downward pressure on longer-term interest rates, including rates on financial assets that

[^13]> investors consider to be close substitutes for longer-term Treasury securities. The reduction in longer-term interest rates, in turn, will contribute to a broad easing in financial market conditions that will provide additional stimulus to support the economic recovery.

Consequently, two factors are at work: (1) the continued focus on capital preservation on the part of investors has caused them to reallocate capital to the relative safety of Treasury securities, thereby bidding up the price and bidding down the yield; and (2) the Federal Reserve's continued policy of buying long-term Treasury securities in order to lower the yield. As the Federal Reserve noted in its June 2012 Open Market Committee meeting minutes, the effect of those two factors has been a continued decline in Treasury yields:

Yields on longer-dated nominal and inflationprotected Treasury securities moved down substantially, on net, over the intermeeting period. The yield on nominal 10-year Treasury securities reached a historically low level immediately following the release of the May employment report. A sizable portion of the

> decline in longer-term Treasury rates over the period appeared to reflect greater safe-haven demands by investors, along with some increase in market participants' expectations of further Federal Reserve balance sheet actions. ${ }^{44}$

At issue, then, is whether those two factors - the continuing tendency of investors to seek the relative safety of long-term Treasury securities and the Federal Reserve's policy of lowering long-term Treasury yields have caused the required return on equity to fall in a fashion similar to the recent decline in interest rates. In large measure, that issue becomes a question of whether the premium required by debt and equity investors also has remained constant as Treasury yields have decreased. To the extent that the risk premium has increased, the higher premium has offset, at least to some degree, the decline in Treasury yields, indicating that the Cost of Equity has not fallen in lock step with the decline in interest rates.

One method of performing that analysis is to analyze the implied required market return of the $S \& P 500$ companies on a "build-up" basis. From that perspective, the required market return represents the sum of: (1) long-

[^14]term Treasury yields; (2) the credit spread (i.e., the incremental return required by debt investors over Treasury yields; and (3) the Equity Risk Premium (i.e., the incremental return required by equity investors over the cost of debt). As shown in Document No. 9 of my exhibit, that has been the case: both debt and equity investors have required increased risk premiums as longterm Treasury yields have fallen. In fact, this analysis demonstrates that despite Treasury yields decreasing in recent years, the overall expected market return for the S\&P 500 has actually increased.

As discussed above, the proposition that the risk premium has increased even as Treasury yields have declined makes practical sense: as investors seek the safety of Treasury securities they require higher equity returns to overcome the currently perceived risk of equity markets vis-à-vis Treasury securities. Even if the decrease in Treasury yields is driven by investors' expectations of continued buying on the part of the Federal Reserve, that expectation does not affect the fundamental assessment of risks associated with equity investments in utility companies. If anything, the uncertainty surrounding the timing and degree of continued Federal intervention introduces an additional element of uncertainty, which
increases investment risk and, therefore, the required return.
Q. Have you reviewed specific market indices that also support the position that cost of equity has not fallen in tandem with long-term interest rates?
A. Yes. As noted above, I have considered Incremental Credit Spreads and the relationship between dividend yields and Treasury yields (that is, the "Yield Spread"). Each of those measures, which are discussed below, supports the position that the Cost of Equity has not fallen in lock step with the decrease in Treasury yields.

## Incremental Credit Spreads

Q. How have credit spreads been affected by current market conditions?
A. The "credit spread" is the return required by debt investors to take on the default risk associated with securities of differing credit quality. For a given credit rating, the credit spread is measured by reference to a Treasury security of similar tenure. That is, the credit spread on A-rated utility bonds may be measured by reference to the 30 -year Treasury Bond yield; the same
would be true of Baa-rated securities. ${ }^{45}$ Because lower credit ratings reflect higher levels of risk, credit spreads typically are higher for lower-rated securities. In that regard, the "incremental credit spread" (e.g., the difference between the credit spreads associated with A and Baa-rated securities) is an indication of incremental return required by investors to take on additional levels of risk. As my Document No. 10 of my exhibit demonstrates, since the beginning of 2010 , the Moody's Utility Bond Index Baa/A credit spread has steadily increased, indicating that debt investors have increased their marginal return requirements.

It is also interesting to note that the incremental credit spread has increased as long-term Treasury yields have decreased. In fact, as Document No. 11 of my exhibit demonstrates, even since January 2010 , changes in the incremental credit spread are negatively correlated with changes in the 30 -year Treasury yield.
Q. What are the implications of those findings in assessing the Company's Cost of Equity?
A. The recent decline in long-term Treasury yields has been accompanied by an increase in the premium required by

[^15]investors to accept incremental levels of credit risk. That is, the incremental credit spread has increased as the level of Treasury yields have decreased. While that inverse relationship applies to the cost of debt, prior academic research has demonstrated that the equity risk premium likewise is inversely related to interest rates. ${ }^{46}$ Consequently, neither the Cost of Equity nor the cost of debt has decreased in lock step with Treasury yields.

Those results also demonstrate the importance of maintaining a financial and credit profile that supports the Company's current senior unsecured credit rating (S\&P: BBB+, Moody's: A3, Fitch: A- $)^{47}$. Because incremental credit spreads have steadily increased, the benefit of maintaining the Company's credit rating is greater in the current market than it has been, even over the past two years. That conclusion is consistent with recent findings by Fitch, which noted that:
While it appears that the credit spread
differential between the rating categories has
a relatively small impact during times of
economic stability, during recent periods of
economic stress, a higher credit rating
produces a meaningful difference in credit

46 Robert S. Harris and Felicia C. Marston, Estimating Shareholder Risk Premia Using Analysts' Growth Forecasts, Financial Management, Summer 1992; Eugene F. Brigham, Dilip K. Shome, and Steve R. Vinson, The Risk Premium Approach to Measuring a Utility's Cost of Equity, Financial Management, Spring 1985, at 33-45; and Farris M. Maddox, Donna T. Pippert, and Rodney N. Sullivan, An Empirical Study of Ex Ante Risk Premiums for the Electric Utility Industry, Financial Management, Autumn 1995, at 8995.

Source: SNL Financial.

> spreads... and provides more assured access to capital. ${ }^{48}$

Since regulatory actions affect credit ratings in several, often significant ways, the Commission's decision in this proceeding will directly affect the Company's credit profile and influence its ability to maintain a credit profile that enables continued access to capital at reasonable costs. Given the Company's substantial capital investment plans and external funding needs, the benefits of reliable and cost-effective capital access are significant.

## Yield Spreads

Q. Please briefly define the term "yield spread", and explain its meaning in assessing capital market conditions.
A. The "yield spread" is the difference between the yield on long-term Treasury securities on the one hand, and common stock dividend yields on the other. Investors often consider yield spreads in their assessment of security valuation and capital market conditions. As explained below, to the extent that yield spreads materially deviate from long-term relationships, it may be an

48 Fitch's Review of Utility ROE Trends, FitchRatings, March 22, 2010, at 3.
indication of continuing dislocations within the capital market.
Q. Have you reviewed the current and historical yield spread for electric utility companies?
A. Yes, I have. As shown in Document No. 12 of my exhibit, for much of the period from January 1, 2000 through February 15, 2013, the 30-year Treasury yield has exceeded the dividend yield on electric utility stocks (as measured by the SNL Electric Company Index). In fact, over that time, the yield spread averaged approximately 58 basis points. ${ }^{49}$ That period, however, includes the 2002 - 2003 credit contraction, during which the Treasury yields and utility dividend yields were essentially equal, and the post-Lehman Brothers bankruptcy period, during which the yields inverted, such that the electric utility index dividend yield exceeded the 30 -year Treasury yield. Excluding those two periods, the average yield spread was 129 basis points (that is, on average, the 30 -year Treasury yield exceeded the dividend yield by 129 basis points.

As Document No. 12 of my exhibit also demonstrates, the yield spread inverted shortly after the September 15,

[^16]2008 Lehman Brothers bankruptcy, and has essentially remained inverted since that time. In fact, since August 2011, the yields have remained inverted, such that the SNL Electric Company Index average dividend yield exceeded the 30 -year Treasury yield by 97 basis points. The continuing instability in the yield spread also has been observed by The Wall Street Journal, which noted that historically, "dividend yields have tended to track the yield on 10 -year Treasurys closely."50 The article went on to note that:
Regulated utilities' dividend yields decoupled
from Treasury yields in December 2007, as the
U.S. recession began. After the initial flight
to quality cut yields on Treasurys,
particularly after Lehman Brothers collapsed in
September 2008, the Federal Reserve's policy of
buying up government debt has helped keep them
low.
Q. How does such data enter into your assessment of the Company's Cost of Equity?
A. As noted above, investors often look to the relationships among financial metrics to assess current and expected

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[^17]levels of market stability. As also noted above, to the extent that current relationships among such indices materially deviate from long-term norms, it may be an indication of continuing or expected market instability. Moreover, such data provide market-based methods by which to assess the implications of the currently low Treasury yields for the Company's Cost of Equity. If, for example, the currently low level Treasury yields indicated a correspondingly low Cost of Equity, the average dividend yield would be approximately 2.54 percent, or lower. ${ }^{51}$ As shown on Document No. 2 of my exhibit, however, the current (proxy group) average dividend yield is approximately 3.97 percent. Again, low Treasury yields are not necessarily indicative of correspondingly low equity return requirements.
Q. What conclusions do you draw from those analyses?
A. First, it is important to recognize the relationships among financial measures relied upon by investors, and to reflect those relationships in Cost of Equity estimates. Simply observing, for example, that long-term Treasury rates are at historically low levels is not a sufficient level of analysis to conclude that the Cost of Equity is at a commensurately low level. As noted above, for
512.54 percent equals 3.12 percent, less the long-term average yield spread of 58 basis points. Excluding the post-Lehman Brothers bankruptcy period, and the 2002 - 2003 credit contraction, implies a yield spread of 129 basis points, suggesting an implied dividend yield of less than 1.83 percent (assumes a constant growth rate), which is more than 200 basis points below the current (proxy group) average dividend yield of 3.97 percent.
example, if investors believed that the current level of long-term Treasury yields is indicative of the cost of Equity, electric utility dividend yields would be more than 200 basis points below their current levels. Recognizing such factors provides a more complete perspective of investor risk and enables a more reasonable determination of the Cost of Equity.

Finally, assessing the results of the Cost of Equity analyses described in Section VI requires interpretation and judgment for the purpose of determining the Company's ROE recommendation. An analysis of the capital market environment provides a more complete perspective, and enables a more reasoned determination of the cost of Equity.
IX. CAPITAL STRUCTURE
Q. What is the Company's proposed capital structure?
A. In its application filed in this docket, the Company has proposed a capital structure comprised of 54.19 percent common equity 45.81 percent debt. ${ }^{52}$
Q. How does the capital structure affect the cost of equity?
A. The capital structure should enable the subject company 52 See Direct Testimony of Sandra W. Callahan.
to maintain its financial integrity, thereby enabling access to capital at competitive rates under a variety of economic and financial market conditions. The capital structure relates to a company's financial risk, which represents the risk that a company may not have adequate cash flows to meet its financial obligations, and is a function of the percentage of debt (or financial leverage) in its capital structure. In that regard, as the percentage of debt in the capital structure increases, so do the fixed obligations for the repayment of that debt. Consequently, as the degree of financial leverage increases, the risk of financial distress (i.e., financial risk) also increases. Since the capital structure can affect the subject company's overall level of risk, ${ }^{53}$ it is an important consideration in establishing a just and reasonable rate of return.
Q. Is there support for the proposition that the capital structure is a key consideration in establishing an appropriate return on equity?
A. Yes. The United States Supreme Court and various utility commissions have long recognized the role of capital structure in the development of a just and reasonable rate of return for a regulated utility. In particular, a

[^18]utility's leverage, or debt ratio, has been explicitly recognized as an important element in determining a just and reasonable rate of return:

Although the determination of whether bonds or stocks should be issued is for management, the matter of debt ratio is not exclusively within its province. Debt ratio substantially affects the manner and cost of obtaining new capital. It is therefore an important factor in the rate of return and must necessarily be considered by and come within the authority of the body charged by law with the duty of fixing a just and reasonable rate of return. ${ }^{54}$

Perhaps the ultimate authority for balancing the issues of cost and financial integrity is the Supreme Court's decision in Hope that was cited and applied by the U.S. Court of Appeals for the D.C. Circuit in 1977:

The rate-making process under the Act, i.e., the fixing of "just and reasonable rates, involves a balancing of the investor and the consumer interests." 320 U.S. at 603, 64 S. Ct. at 288. The equity investor's stake is made

[^19]> less secure as the company's debt rises, but the consumer rate-payer's burden is alleviated. ${ }^{55}$

Consequently, the principles of fairness and reasonableness with respect to the allowed rate of return and capital structure are considered at both the federal and state levels.
Q. Please discuss your analysis of the capital structures of the proxy group companies.
A. I calculated the average capital structure for each of the proxy group companies over the last eight quarters. As shown in Document No. 13 of my exhibit, the proxy group actual capital structure common equity ratios range from 47.99 percent to 57.81 percent. Based on that review, it is apparent that the Company's proposed capital structure is generally consistent with the capital structures of the proxy group companies.
Q. What is the basis for using average capital components rather than a point-in-time measurement?
A. Measuring the capital components at a particular point in

[^20]time can skew the capital structure by the specific circumstances of a particular period. Therefore, it is more appropriate to normalize the relative relationship between the capital components over a period of time.
Q. What is your conclusion regarding the Company's proposed capital structure as it relates to the Company's Cost of Equity?
A. Considering the average actual common equity ratio ranges from of 47.99 percent to 57.81 percent for the proxy group companies, I believe that Tampa Electric's proposed common equity ratio of 54.19 percent is generally consistent with the proxy group companies.

## X. CONCLUSIONS AND RECOMMENDATION

Q. What is your conclusion regarding the Company's Cost of Equity?
A. I believe that a rate of return on common equity in the range of 10.50 percent to 11.50 percent represents the range of equity investors' required rate of return for investment in integrated electric utilities similar to Tampa Electric in today's capital markets. Within that range, I conclude that the Cost of Equity for Tampa

Electric is 11.25 percent My recommendation also takes into consideration the Company's risk profile relative to the proxy group analytical results with respect to: (1) the incremental risks associated with the Company's need to fund substantial capital; and (2) flotation costs associated with equity issuances. As such, a rate of return on common equity in the range of 10.50 percent to 11.50 percent reasonably represents the return required to invest in a company with a risk profile comparable to Tampa Electric. Document No. 1 of my exhibit summarizes my analytical results.
Q. Does this conclude your direct testimony?
A. Yes, it does.

## EXHIBIT

 OFROBERT B. HEVERT

ON BEHALF OF TAMPA ELECTRIC COMPANY

## Summary of Results

Constant Growth DCF Results

| Mean Results | Mean Low | Mean | Mean High |
| :--- | :---: | :---: | :---: |
| 30-Day Average | $8.80 \%$ | $10.60 \%$ | $13.09 \%$ |
| 90-Day Average | $8.88 \%$ | $10.69 \%$ | $13.18 \%$ |
| 180-Day Average | $8.90 \%$ | $10.70 \%$ | $13.19 \%$ |
|  |  |  |  |
| Median Results | Median Low | Median | Median High |
| 30-Day Average | $9.58 \%$ | $10.84 \%$ | $11.45 \%$ |
| 90-Day Average | $9.74 \%$ | $10.86 \%$ | $11.47 \%$ |
| 180-Day Average | $9.68 \%$ | $10.81 \%$ | $11.42 \%$ |

CAPM Results

|  | Sharpe Ratio Derived | Bloomberg Market DCF Derived | Capital IQ Market DCF Derived |
| :---: | :---: | :---: | :---: |
| Proxy Group Average Bloomberg Beta Coefficient |  |  |  |
| Current 30-Year Treasury | 7.42\% | 10.18\% | 10.13\% |
| Near-Term Projected 30-Year Treasury | 7.56\% | 10.31\% | 10.26\% |
| Long-Term Projected 30-Year Treasury | 9.41\% | 12.16\% | 12.11\% |
| Proxy Group Average Value Line Beta Coefficient |  |  |  |
| Current 30-Year Treasury | 7.45\% | 10.22\% | 10.16\% |
| Near-Term Projected 30-Year Treasury | 7.58\% | 10.35\% | 10.30\% |
| Long-Term Projected 30-Year Treasury | 9.43\% | 12.20\% | 12.15\% |

## Bond Yield Plus Risk Premium Results

Return on Equity
Current 30-Year Treasury 10.23\%

Near-Term Projected 30-Year Treasury
10.24\%

Long-Term Projected 30-Year Treasury
10.76\%

| Constant Growth Discounted Cash Flow Model 30 Day Average Stock Price |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | [1] | [2] | [3] | [4] | [5] | [6] | [7] | [8] | [9] | [10] | [11] |
| Company | Ticker | Annualized Dividend | Average <br> Stock <br> Price | Dividend Yield | Expected Dividend Yield | $\qquad$ | First Call Earnings Growth | Value Line Earnings Growth | $\begin{gathered} \text { Average } \\ \text { Earnings } \\ \text { Growth } \\ \hline \end{gathered}$ | $\begin{aligned} & \text { Low } \\ & \text { ROE } \end{aligned}$ | $\begin{aligned} & \text { Mean } \\ & \text { ROE } \end{aligned}$ | $\begin{aligned} & \text { High } \\ & \text { ROE } \end{aligned}$ |
| American Electric Power Company, Inc. | AEP | \$1.88 | \$44.20 | 4.25\% | 4.32\% | 3.38\% | 3.47\% | 3.00\% | 3.28\% | 7.32\% | 7.61\% | 7.80\% |
| Cleco Corp. | CNL | \$1.35 | \$42.22 | 3.20\% | 3.27\% | 3.00\% | 3.00\% | 8.00\% | 4.67\% | 6.25\% | 7.94\% | 11.33\% |
| Empire District Electric | EDE | \$1.00 | \$21.10 | 4.74\% | 4.93\% | N/A | 10.20\% | 5.50\% | 7.85\% | 10.37\% | 12.78\% | 15.18\% |
| Great Plains Energy Inc. | GXP | \$0.87 | \$21.19 | 4.11\% | 4.24\% | 7.10\% | 7.20\% | 5.50\% | 6.60\% | 9.72\% | 10.84\% | 11.45\% |
| IDACORP, Inc. | IDA | \$1.52 | \$45.18 | 3.36\% | 3.42\% | 4.00\% | 4.00\% | 2.00\% | 3.33\% | 5.40\% | 6.75\% | 7.43\% |
| Otter Tail Corporation | OTTR | \$1.19 | \$26.63 | 4.47\% | 4.73\% | 6.00\% | 5.00\% | 24.00\% | 11.67\% | 9.58\% | 16.40\% | 29.00\% |
| Pinnacle West Capital Corp. | PNW | \$2.18 | \$53.04 | 4.11\% | 4.25\% | 6.90\% | 7.50\% | 6.50\% | 6.97\% | 10.74\% | 11.22\% | 11.76\% |
| PNM Resources, Inc. | PNM | \$0.58 | \$20.93 | 2.77\% | 2.93\% | 8.35\% | 9.30\% | 16.00\% | 11.22\% | 11.24\% | 14.14\% | 18.99\% |
| Portland General Electric Company | POR | \$1.08 | \$28.30 | 3.82\% | 3.89\% | 4.07\% | 1.99\% | 5.50\% | 3.85\% | 5.84\% | 7.74\% | 9.42\% |
| Southern Company | SO | \$1.96 | \$43.77 | 4.48\% | 4.59\% | 4.98\% | 4.86\% | 5.00\% | 4.95\% | 9.45\% | 9.54\% | 9.59\% |
| Westar Energy, Inc. | WR | \$1.32 | \$29.92 | 4.41\% | 4.57\% | 6.38\% | 7.50\% | 7.50\% | 7.13\% | 10.93\% | 11.70\% | 12.08\% |
| PROXY GROUP MEAN |  |  |  | 3.97\% | 4.10\% | 5.42\% | 5.82\% | 8.05\% | 6.50\% | 8.80\% | 10.60\% | 13.09\% |
| PROXY GROUP MEDIAN |  |  |  | 4.11\% | 4.25\% | 5.49\% | 5.00\% | 5.50\% | 6.60\% | 9.58\% | 10.84\% | 11.45\% |

Notes:
[1] Source: Bloomberg Professional
[2] Source: Bloomberg Professional, equals 30-trading day average as of February 15, 2013
[3] Equals [1] / [2]
[4] Equals [3] $\times(1+0.5 \times[8])$
[5] Source: Zacks
[6] Source: Yahoo! Finance
[7] Source: Value Line
[8] Equals Average([5], [6], [7])
[9] Equals [3] $\times(1+0.5 \times$ Minimum([5], [6], [7]) $)+$ Minimum([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] $\times(1+0.5 \times$ Maximum([5], [6], [7]) $)+$ Maximum([5], [6], [7])

Constant Growth Discounted Cash Flow Model
90 Day Average Stock Price

| Company | Ticker | [1] | [3] |  | ExpectedDividendYield | ZacksEarningsGrowth | $[6]$First CallEarningsGrowth | [7]Value LineEarningsGrowth | $\begin{gathered} {[8]} \\ \hline \text { Average } \\ \text { Earnings } \\ \text { Growth } \end{gathered}$ | - | [9] <br> Low ROE | [10] | [11] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Annualized Dividend | Average Stock Price | Dividend Yield |  |  |  |  |  |  |  | $\begin{aligned} & \text { Mean } \\ & \text { ROE } \end{aligned}$ | High <br> ROE |
| American Electric Power Company, Inc. | AEP | \$1.88 | \$43.47 | 4.32\% | 4.40\% | 3.38\% | 3.47\% | 3.00\% | 3.28\% |  | 7.39\% | 7.68\% | 7.87\% |
| Cleco Corp. | CNL | \$1.35 | \$41.30 | 3.27\% | 3.34\% | 3.00\% | 3.00\% | 8.00\% | 4.67\% |  | 6.32\% | 8.01\% | 11.40\% |
| Empire District Electric | EDE | \$1.00 | \$20.84 | 4.80\% | 4.99\% | N/A | 10.20\% | 5.50\% | 7.85\% |  | 10.43\% | 12.84\% | 15.24\% |
| Great Plains Energy Inc. | GXP | \$0.87 | \$21.10 | 4.12\% | 4.26\% | 7.10\% | 7.20\% | 5.50\% | 6.60\% |  | 9.74\% | 10.86\% | 11.47\% |
| IDACORP, Inc. | IDA | \$1.52 | \$43.89 | 3.46\% | 3.52\% | 4.00\% | 4.00\% | 2.00\% | 3.33\% |  | 5.50\% | 6.85\% | 7.53\% |
| Otter Tail Corporation | OTTR | \$1.19 | \$25.04 | 4.75\% | 5.03\% | 6.00\% | 5.00\% | 24.00\% | 11.67\% |  | 9.87\% | 16.70\% | 29.32\% |
| Pinnacle West Capital Corp. | PNW | \$2.18 | \$52.06 | 4.19\% | 4.33\% | 6.90\% | 7.50\% | 6.50\% | 6.97\% |  | 10.82\% | 11.30\% | 11.84\% |
| PNM Resources, Inc. | PNM | \$0.58 | \$21.07 | 2.75\% | 2.91\% | 8.35\% | 9.30\% | 16.00\% | 11.22\% |  | 11.22\% | 14.12\% | 18.97\% |
| Portland General Electric Company | POR | \$1.08 | \$27.40 | 3.94\% | 4.02\% | 4.07\% | 1.99\% | 5.50\% | 3.85\% |  | 5.97\% | 7.87\% | 9.55\% |
| Southem Company | SO | \$1.96 | \$43.99 | 4.46\% | 4.57\% | 4.98\% | 4.86\% | 5.00\% | 4.95\% |  | 9.42\% | 9.51\% | 9.57\% |
| Westar Energy, Inc. | WR | \$1.32 | \$29.22 | 4.52\% | 4.68\% | 6.38\% | 7.50\% | 7.50\% | 7.13\% |  | 11.04\% | 11.81\% | 12.19\% |
| PROXY GROUP MEAN |  |  |  | 4.05\% | 4.19\% | 5.42\% | 5.82\% | 8.05\% | 6.50\% |  | 8.88\% | 10.69\% | 13.18\% |
| PROXY GROUP MEDIAN |  |  |  | 4.19\% | 4.33\% | 5.49\% | 5.00\% | 5.50\% | 6.60\% |  | 9.74\% | 10.86\% | 11.47\% |

Notes:
[1] Source: Bloomberg Professional
[2] Source: Bloomberg Professional, equals 90-trading day average as of February 15, 2013
[3] Equals [1] / [2]
[4] Equals $[3] \times(1+0.5 \times[8])$
[5] Source: Zacks
[6] Source: Yahoo! Finance
[7] Source: Value Line
[8] Equals Average([5], [6], [7])
$[9]$ Equals $[3] \times(1+0.5 \times$ Minimum([5], [6], [7])) $+\operatorname{Minimum([5],~[6],~[7])~}$
[10] Equals $[4]+[8]$
[11] Equals $[3] \times(1+0.5 \times$ Maximum([5], [6], [7])) + Maximum([5], [6], [7])

Constant Growth Discounted Cash Flow Model
180 Day Average Stock Price

| Company | Ticker | [1] [2] [3] |  |  | $\begin{gathered} {[4]} \\ \hline \text { Expected } \\ \text { Dividend } \\ \text { Yield } \\ \hline \end{gathered}$ | Z5]EarningsGrowth | $\begin{gathered} {[6]} \\ \hline \text { First Call } \\ \text { Earnings } \\ \text { Growth } \end{gathered}$ | [7]Value LineEarningsGrowth | [8] <br> Average <br> Earnings <br> Growth | - | [9] <br> Low <br> ROE | [10] | [11] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Annualized Dividend | Average <br> Stock <br> Price | Dividend Yield |  |  |  |  |  |  |  | Mean ROE | High ROE |
| American Electric Power Company, Inc. | AEP | \$1.88 | \$42.69 | 4.40\% | 4.48\% | 3.38\% | 3.47\% | 3.00\% | 3.28\% |  | 7.47\% | 7.76\% | 7.95\% |
| Cleco Corp. | CNL | \$1.35 | \$41.68 | 3.24\% | 3.31\% | 3.00\% | 3.00\% | 8.00\% | 4.67\% |  | 6.29\% | 7.98\% | 11.37\% |
| Empire District Electric | EDE | \$1.00 | \$21.05 | 4.75\% | 4.94\% | N/A | 10.20\% | 5.50\% | 7.85\% |  | 10.38\% | 12.79\% | 15.19\% |
| Great Plains Energy Inc. | GXP | \$0.87 | \$21.36 | 4.07\% | 4.21\% | 7.10\% | 7.20\% | 5.50\% | 6.60\% |  | 9.68\% | 10.81\% | 11.42\% |
| IDACORP, Inc. | IDA | \$1.52 | \$42.96 | 3.54\% | 3.60\% | 4.00\% | 4.00\% | 2.00\% | 3.33\% |  | 5.57\% | 6.93\% | 7.61\% |
| Otter Tail Corporation | OTTR | \$1.19 | \$24.05 | 4.95\% | 5.24\% | 6.00\% | 5.00\% | 24.00\% | 11.67\% |  | 10.07\% | 16.90\% | 29.54\% |
| Pinnacle West Capital Corp. | PNW | \$2.18 | \$52.17 | 4.18\% | 4.32\% | 6.90\% | 7.50\% | 6.50\% | 6.97\% |  | 10.81\% | 11.29\% | 11.84\% |
| PNM Resources, Inc. | PNM | \$0.58 | \$20.61 | 2.81\% | 2.97\% | 8.35\% | 9.30\% | 16.00\% | 11.22\% |  | 11.28\% | 14.19\% | 19.04\% |
| Portland General Electric Company | POR | \$1.08 | \$27.16 | 3.98\% | 4.05\% | 4.07\% | 1.99\% | 5.50\% | 3.85\% |  | 6.01\% | 7.91\% | 9.59\% |
| Southern Company | SO | \$1.96 | \$45.26 | 4.33\% | 4.44\% | 4.98\% | 4.86\% | 5.00\% | 4.95\% |  | 9.30\% | 9.38\% | 9.44\% |
| Westar Energy, Inc. | WR | \$1.32 | \$29.49 | 4.48\% | 4.64\% | 6.38\% | 7.50\% | 7.50\% | 7.13\% |  | 11.00\% | 11.76\% | 12.14\% |
| PROXY GROUP MEAN |  |  |  | 4.07\% | 4.20\% | 5.42\% | 5.82\% | 8.05\% | 6.50\% |  | 8.90\% | 10.70\% | 13.19\% |
| PROXY GROUP MEDIAN |  |  |  | 4.18\% | 4.32\% | 5.49\% | 5.00\% | 5.50\% | 6.60\% |  | 9.68\% | 10.81\% | 11.42\% |

Notes:
[1] Source: Bloomberg Professiona
[2] Source: Bloomberg Professional, equals 180-trading day average as of February 15, 2013
[3] Equals [1] / [2]
[4] Equals [3] $\times(1+0.5 \times[8])$
[5] Source: Zacks
[6] Source: Yahoo! Finance
[7] Source: Value Line
[8] Equals Average([5], [6], [7])
[9] Equals [3] $\times(1+0.5 \times$ Minimum([5], [6], [7])) + Minimum([5], [6], [7])
[10] Equals [4] + [8]
[11] Equals [3] $\times(1+0.5 \times$ Maximum([5], [6], [7])) + Maximum([5], [6], [7])

Sharpe Ratio Derived Ex-Ante Market Risk Premium

| $[1]$ | $[2]$ | $[3]$ | [4] | $[5]$ |
| :---: | :---: | :---: | :---: | :---: |
| $R_{h}$ | Vol $_{h}$ | VOL $_{\boldsymbol{h}}$ | Historical <br> Sharpe <br> Ratio | RP $_{\mathbf{e}}$ |
| $6.60 \%$ | $20.30 \%$ | $18.54 \%$ | $32.52 \%$ | $6.03 \%$ |


|  | $[6]$ | $[7]$ | [8] | $[9]$ |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | VXV | Jul 13 VIX <br> Futures | Aug 13 VIX <br> Futures | Sep 13 VIX <br> Futures |


|  |  |  |  |  |
| :---: | :--- | :--- | :--- | :--- |
| $2 / 15 / 2013$ | 14.26 | 17.75 | 18.40 | 19.05 |
| $2 / 14 / 2013$ | 14.43 | 17.70 | 18.35 | 18.90 |
| $2 / 13 / 2013$ | 14.63 | 17.65 | 18.20 | 18.90 |
| $2 / 12 / 2013$ | 14.53 | 17.70 | 18.40 | 18.95 |
| $2 / 11 / 2013$ | 14.68 | 17.80 | 18.45 | 19.00 |
| $2 / 8 / 2013$ | 14.80 | 18.00 | 18.60 | 19.20 |
| $2 / 7 / 2013$ | 15.19 | 18.25 | 18.90 | 19.45 |
| $2 / 6 / 2013$ | 15.14 | 18.30 | 18.95 | 19.50 |
| $2 / 5 / 2013$ | 15.30 | 18.50 | 19.05 | 19.60 |
| $2 / 4 / 2013$ | 15.79 | 18.55 | 19.15 | 19.70 |
| $2 / 1 / 2013$ | 14.79 | 18.45 | 19.00 | 19.50 |
| $1 / 31 / 2013$ | 15.55 | 18.50 | 19.05 | 19.55 |
| $1 / 30 / 2013$ | 15.42 | 18.40 | 18.95 | 19.50 |
| $1 / 29 / 2013$ | 14.74 | 18.05 | 18.70 | 19.25 |
| $1 / 28 / 2013$ | 15.07 | 18.20 | 18.75 | 19.35 |
| $1 / 25 / 2013$ | 14.66 | 18.10 | 18.75 | 19.30 |
| $1 / 24 / 2013$ | 14.67 | 18.20 | 18.85 | 19.45 |
| $1 / 23 / 2013$ | 14.50 | 18.25 | 18.90 | 19.50 |
| $1 / 22 / 2013$ | 14.72 | 18.55 | 19.20 | 19.80 |
| $1 / 18 / 2013$ | 15.29 | 19.15 | 19.80 | 20.45 |
| $1 / 17 / 2013$ | 16.08 | 19.80 | 20.45 | 21.05 |
| $1 / 16 / 2013$ | 16.24 | 20.10 | 20.75 | 21.35 |
| $1 / 15 / 2013$ | 16.33 | 20.30 | 20.80 | 21.35 |
| $1 / 14 / 2013$ | 16.29 | 20.30 | 20.85 | 21.40 |
| $1 / 11 / 2013$ | 16.01 | 20.50 | 21.00 | 21.60 |
| $1 / 10 / 2013$ | 16.12 | 20.60 | 21.15 | 21.75 |
| $1 / 9 / 2013$ | 16.50 | 20.90 | 21.50 | 22.15 |
| $1 / 8 / 2013$ | 16.45 | 21.15 | 21.75 | 22.35 |
| $1 / 7 / 2013$ | 16.45 | 21.20 | 21.75 | 22.35 |
| $1 / 4 / 2013$ | 16.34 | 21.15 | 21.75 | 22.30 |
|  |  |  |  |  |
| Average: |  |  | 18.54 |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

Notes:
[1] Source: Morningstar, Inc.
$R P_{n}=$ historical arithmetic average Risk Premium
[2] Source: Morningstar, Inc.
Vol $_{h}=$ historical market volatility
[3] $\mathrm{Vol}_{e}=$ expected market volatility (average of Cols. [6] to [9])
[4] Equais [1]/ [2]
[5] Equals [3] $\times$ [4]
[6] Source: Bloomberg Professional
[7] Source: Bloomberg Professional
[8] Source: Bloomberg Professional
[9] Source: Bloomberg Professional

Ex-Ante Market Risk Premium
Market DCF Method Based - Bloomberg

| $[1]$ | [2] | [3] |
| :---: | :---: | :---: |
| S\&P 500 | Current 30-Year |  |
| Est. Required | Treasury (30-day | Implied Market |
| Market Return | average) | Risk Premium |
| $13.00 \%$ | $3.12 \%$ | $9.88 \%$ |



|  |  | [4] | [5] | [6] | [7] | [B] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Market Capitalization | Weight in Index | $\begin{gathered} \text { Estimated } \\ \text { Dividend Yield } \end{gathered}$ | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| AMERICAN TOWER CORP | AMT | 29,323.32 | 0.21\% | 1.21\% | 17.57\% | 18.88\% | 0.0394\% |
| AMAZON.COM INC | AMZN | 121,533.32 | 0.87\% | 0.00\% | 34.70\% | 34.70\% | 0.3003\% |
| AUTONATION INC | AN | 5,455.01 | 0.04\% | 0.00\% | 20.48\% | 20.48\% | 0.0080\% |
| ABERCROMBIE \& FITCH CO-CL A | ANF | 4,114.98 | 0.03\% | 1.36\% | 19.31\% | 20.81\% | 0.0061\% |
| AON PLC | AON | 18,364.80 | 0.13\% | 1.11\% | 8.75\% | 9.90\% | 0.0130\% |
| APACHE CORP | APA | 30,093.84 | 0.21\% | 0.99\% | 6.34\% | 7.36\% | 0.0158\% |
| ANADARKO PETROLEUM CORP | APC | 41,769.88 | 0.30\% | 0.44\% | 12.79\% | 13.25\% | 0.0394\% |
| AIR PRODUCTS \& CHEMICALS INC | APD | 18,886.19 | 0.13\% | 3.01\% | 9.40\% | 12.55\% | 0.0169\% |
| AMPHENOL CORP-CLA | APH | 11,329.79 | 0.08\% | 0.61\% | 18.50\% | 19.17\% | 0.0155\% |
| APOLLO GROUP INC-CL A | APOL | 2,171.44 | 0.02\% | 0.00\% | 9.26\% | 9.26\% | 0.0014\% |
| AIRGAS INC | ARG | 7,490.76 | 0.05\% | 1.46\% | 12.87\% | 14.42\% | 0.0077\% |
| ALLEGHENY TECHNOLOGIES INC | ATI | 3,545.27 | 0.03\% | 2.18\% | 15.00\% | 17.34\% | 0.0044\% |
| AVALONBAY COMMUNITIES INC | AVB | 14,872.45 | 0.11\% | 3.25\% | 8.57\% | 11.96\% | 0.0127\% |
| AVON PRODUCTS INC | AVP | 8,945.76 | 0.06\% | 1.15\% | 15.29\% | 16.53\% | 0.0105\% |
| AVERY DENNISON CORP | AVY | 4,000.65 | 0.03\% | 2.71\% | 7.00\% | 9.81\% | 0.0028\% |
| AMERICAN EXPRESS CO | AXP | 68,786.25 | 0.49\% | 1.37\% | 10.07\% | 11.51\% | 0.0564\% |
| AUTOZONE INC | AZO | 13,582.53 | 0.10\% | 0.00\% | 16.70\% | 16.70\% | 0.0161\% |
| BOEING COTTHE | BA | 56,205.79 | 0.40\% | 2.52\% | 11.48\% | 14.14\% | 0.0566\% |
| BANK OF AMERICA CORP | BAC | 132,378.64 | 0.94\% | 0.86\% | 8.67\% | 9.57\% | 0.0902\% |
| BAXTER INTERNATIONAL INC | BAX | 37,484.06 | 0.27\% | 2.48\% | 8.68\% | 11.27\% | 0.0301\% |
| BED BATH \& BEYOND INC | BBBY | 13,102.30 | 0.09\% | 0.00\% | 13.78\% | 13.78\% | 0.0129\% |
| BB\&T CORP | BBT | 21,222.75 | 0.15\% | 3.02\% | 6.50\% | 9.61\% | 0.0145\% |
| BEST BUY CO INC | BBY | 5,892.87 | 0.04\% | 3.05\% | 5.60\% | 8.74\% | 0.0037\% |
| CR BARD INC | BCR | 8,259.18 | 0.06\% | 0.82\% | 7.33\% | 8.18\% | 0.0048\% |
| BECTON DICKINSON AND CO | BDX | 17,157.80 | 0.12\% | 2.20\% | 7.85\% | 10.14\% | 0.0124\% |
| BEAM INC | BEAM | 9,914.32 | 0.07\% | 1.46\% | 11.92\% | 13.46\% | 0.0095\% |
| FRANKLIN RESOURCES INC | BEN | 30,941.97 | 0.22\% | 2.86\% | 14.68\% | 17.75\% | 0.0391\% |
| BROWN-FORMAN CORP-CLASS B | BF/B | 14,250.18 | 0.10\% | 1.48\% | 12.50\% | 14.07\% | 0.0143\% |
| BAKER HUGHES INC | BHI | 20,601.51 | 0.15\% | 1.29\% | 13.00\% | 14.37\% | 0.0211\% |
| BIOGEN IDEC INC | BIIB | 39,272.72 | 0.28\% | 0.00\% | 17.97\% | 17.97\% | 0.0503\% |
| BANK OF NEW YORK MELLON CORP | BK | 32,798.79 | 0.23\% | 2.11\% | 12.67\% | 14.92\% | 0.0348\% |
| BLACKROCK INC | BLK | 42,492.57 | 0.30\% | 2.78\% | 11.94\% | 14.89\% | 0.0451\% |
| BALL CORP | BLL | 6,971.03 | 0.05\% | 1.10\% | 10.00\% | 11.16\% | 0.0055\% |
| BMC SOFTWARE INC | BMC | 5,919.89 | 0.04\% | 0.00\% | 15.00\% | 15.00\% | 0.0063\% |
| BEMIS COMPANY | BMS | 3,869.24 | 0.03\% | 2.74\% | 7.00\% | 9.83\% | 0.0027\% |
| BRISTOL-MYERS SQUIBB CO | BMY | 60,418.39 | 0.43\% | 3.78\% | 7.19\% | 11.10\% | 0.0478\% |
| BROADCOM CORP-CL A | BRCM | 19,823.90 | 0.14\% | 1.26\% | 14.43\% | 15.78\% | 0.0223\% |
| BERKSHIRE HATHAWAY INC-CL B | BRK/B | 250,217.92 | N/A | 0.00\% | N/A | N/A | N/A |
| BOSTON SCIENTIFIC CORP | BSX | 10,059.38 | 0.07\% | 0.00\% | 7.78\% | 7.78\% | 0.0056\% |
| PEABODY ENERGY CORP | BTU | 6,548.62 | 0.05\% | 1.41\% | 12.00\% | 13.50\% | 0.0063\% |
| BORGWARNER INC | BWA | 8,910.05 | 0.06\% | 0.02\% | 14.98\% | 15.00\% | 0.0095\% |
| BOSTON PROPERTIES INC | BXP | 16,225.88 | 0.12\% | 2.46\% | 4.84\% | 7.36\% | 0.0085\% |




|  |  | [4] | [5] | [6] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| EMC CORP/MA | EMC | 50,798.78 | 0.36\% | 0.00\% | 13.67\% | 13.67\% | 0.0494\% |
| EASTMAN CHEMICAL CO | EMN | 11,263.28 | 0.08\% | 1.51\% | 7.67\% | 9.24\% | 0.0074\% |
| EMERSON ELECTRIC CO | EMR | 42,190.70 | 0.30\% | 2.80\% | 10.17\% | 13.11\% | 0.0394\% |
| EOG RESOURCES INC | EOG | 35,507.08 | 0.25\% | 0.54\% | 11.86\% | 12.44\% | 0.0314\% |
| EQUITY RESIDENTIAL | EQR | 18,677.64 | 0.13\% | 3.31\% | 6.75\% | 10.17\% | 0.0135\% |
| EQT CORP | EQT | 9,020.19 | 0.06\% | 0.51\% | 30.00\% | 30.59\% | 0.0196\% |
| EXPRESS SCRIPTS HOLDING CO | ESRX | 46,679.00 | 0.33\% | 0.00\% | 15.86\% | 15.86\% | 0.0527\% |
| ENSCO PLC-CL A | ESV | 15,125.52 | 0.11\% | 2.34\% | 20.07\% | 22.64\% | 0.0244\% |
| E*TRADE FINANCIAL CORP | ETFC | 3,221.65 | 0.02\% | 0.00\% | 26.00\% | 26.00\% | 0.0060\% |
| EATON CORP PLC | ETN | 28,519.22 | 0.20\% | 2.69\% | 10.00\% | 12.82\% | 0.0260\% |
| ENTERGY CORP | ETR | 10,988.04 | 0.08\% | 5.39\% | 3.50\% | 8.98\% | 0.0070\% |
| EDWARDS LIFESCIENCES CORP | EW | 9,970.35 | 0.07\% | 0.00\% | 17.68\% | 17.68\% | 0.0125\% |
| EXELON CORP | EXC | 26,089.81 | 0.19\% | 4.98\% | -0.52\% | 4.45\% | 0.0083\% |
| EXPEDITORS INTL WASH INC | EXPD | 8,890.08 | 0.06\% | 1.31\% | 7.95\% | 9.32\% | 0.0059\% |
| EXPEDIA INC | EXPE | 8,729.49 | 0.06\% | 0.68\% | 13.64\% | 14.37\% | 0.0089\% |
| FORD MOTOR CO | $F$ | 48,303.02 | 0.34\% | 2.93\% | 8.62\% | 11.68\% | 0.0402\% |
| FASTENAL CO | FAST | 15,679.36 | 0.11\% | 0.93\% | 18.77\% | 19.78\% | 0.0221\% |
| FREEPORT-MCMORAN COPPER | FCX | 32,599.61 | N/A | 3.64\% | N/A | N/A | N/A |
| FAMILY DOLLAR STORES | FDO | 6,358.87 | 0.05\% | 1.64\% | 10.79\% | 12.51\% | 0.0057\% |
| FEDEX CORP | FDX | 33,656.82 | 0.24\% | 0.52\% | 11.14\% | 11.69\% | 0.0280\% |
| FIRSTENERGY CORP | FE | 17,213.79 | 0.12\% | 5.34\% | 2.50\% | 7.91\% | 0.0097\% |
| F5 NETWORKS INC | FFIV | 8,090.15 | 0.06\% | 0.00\% | 18.43\% | 18.43\% | 0.0106\% |
| FIRST HORIZON NATIONAL CORP | FHN | 2,589.45 | 0.02\% | 1.41\% | 8.33\% | 9.80\% | 0.0018\% |
| FIDELITY NATIONAL INFORMATIO | FIS | 10,804.35 | 0.08\% | 2.39\% | 12.86\% | 15.40\% | 0.0118\% |
| FISERV INC | FISV | 10,831.31 | 0.08\% | 0.00\% | 11.71\% | 11.71\% | 0.0090\% |
| FIFTH THIRD BANCORP | FITB | 14,114.43 | 0.10\% | 2.80\% | 7.84\% | 10.75\% | 0.0108\% |
| FLIR SYSTEMS INC | FLIR | 4,026.70 | 0.03\% | 1.22\% | 12.50\% | 13.80\% | 0.0040\% |
| FLUOR CORP | FLR | 10,923.02 | 0.08\% | 0.98\% | 10.18\% | 11.20\% | 0.0087\% |
| FLOWSERVE CORP | FLS | 7,959.49 | 0.06\% | 0.90\% | 12.33\% | 13.29\% | 0.0075\% |
| FMC CORP | FMC | 8,225.79 | 0.06\% | 0.89\% | 11.46\% | 12.40\% | 0.0073\% |
| FOSSIL INC | FOSL | 6,221.80 | 0.04\% | 0.00\% | 17.05\% | 17.05\% | 0.0076\% |
| FOREST LABORATORIES INC | FRX | 9,647.48 | 0.07\% | 0.00\% | 10.43\% | 10.43\% | 0.0072\% |
| FIRST SOLAR INC | FSLR | 3,189.57 | 0.02\% | 0.00\% | 9.50\% | 9.50\% | 0.0022\% |
| FMC TECHNOLOGIES INC | FTI | 12,537.87 | 0.09\% | 0.00\% | 15.33\% | 15.33\% | 0.0137\% |
| FRONTIER COMMUNICATIONS CORP | FTR | 4,158.52 | 0.03\% | 9.60\% | 2.39\% | 12.11\% | 0.0036\% |
| AGL RESOURCES INC | GAS | 4,682.05 | 0.03\% | 4.70\% | 5.50\% | 10.32\% | 0.0034\% |
| GANNETT CO | GCI | 4,719.83 | 0.03\% | 4.09\% | 4.50\% | 8.68\% | 0.0029\% |
| GENERAL DYNAMICS CORP | GD | 23,579.46 | 0.17\% | 3.17\% | 5.56\% | 8.82\% | 0.0148\% |
| GENERAL ELECTRIC CO | GE | 248,577.73 | 1.77\% | 3.28\% | 9.75\% | 13.19\% | 0.2334\% |
| GILEAD SCIENCES INC | GILD | 63,824.28 | 0.45\% | 0.00\% | 22.68\% | 22.68\% | 0.1031\% |
| GENERAL MILLS INC | GIS | 29,277.87 | 0.21\% | 2.90\% | 8.00\% | 11.02\% | 0.0230\% |
| CORNING INC | GLW | 18,979.22 | 0.14\% | 2.82\% | 11.50\% | 14.48\% | 0.0196\% |





|  |  | [4] | [5] | [6] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| NISOURCE INC | NI | 8,394.36 | N/A | 3.65\% | N/A | N/A | N/A |
| NIKE INC -CL B | NKE | 48,975.95 | 0.35\% | 1.49\% | 12.30\% | 13.88\% | 0.0484\% |
| NORTHROP GRUMMAN CORP | NOC | 15,650.35 | 0.11\% | 3.54\% | 3.33\% | 6.93\% | 0.0077\% |
| NATIONAL OILWELL VARCO INC | NOV | 29,798.00 | 0.21\% | 0.72\% | 11.33\% | 12.10\% | 0.0257\% |
| NRG ENERGY INC | NRG | 7,857.35 | N/A | 0.54\% | N/A | N/A | N/A |
| NORFOLK SOUTHERN CORP | NSC | 22,739.54 | 0.16\% | 2.78\% | 15.00\% | 17.99\% | 0.0291\% |
| NETAPP INC | NTAP | 13,005.71 | 0.09\% | 0.00\% | 12.83\% | 12.83\% | 0.0119\% |
| NORTHERN TRUST CORP | NTRS | 12,822.57 | 0.09\% | 2.38\% | 8.08\% | 10.55\% | 0.0096\% |
| NORTHEAST UTILITIES | NU | 12,981.55 | 0.09\% | 3.21\% | 7.25\% | 10.57\% | 0.0098\% |
| NUCOR CORP | NUE | 15,167.23 | 0.11\% | 3.08\% | 7.33\% | 10.52\% | 0.0114\% |
| NVIDIA CORP | NVDA | 7,838.75 | 0.06\% | 2.42\% | 13.00\% | 15.57\% | 0.0087\% |
| NEWELL RUBBERMAID INC | NWL | 6,896.65 | 0.05\% | 2.54\% | 8.87\% | 11.53\% | 0.0057\% |
| NEWS CORP-CL A | NWSA | 69,147.02 | 0.49\% | 0.56\% | 13.00\% | 13.60\% | 0.0670\% |
| NYSE EURONEXT | NYX | 9,090.63 | 0.06\% | 3.21\% | 10.00\% | 13.37\% | 0.0087\% |
| OWENS-ILLINOIS INC | Ol | 4,366.04 | 0.03\% | 0.00\% | 7.00\% | 7.00\% | 0.0022\% |
| ONEOK INC | OKE | 9,766.18 | 0.07\% | 2.71\% | 10.50\% | 13.36\% | 0.0093\% |
| OMNICOM GROUP | OMC | 15,124.34 | 0.11\% | 2.65\% | 6.00\% | 8.73\% | 0.0094\% |
| ORACLE CORP | ORCL | 166,978.66 | 1.19\% | 0.73\% | 13.56\% | 14.34\% | 0.1705\% |
| O'REILLY AUTOMOTIVE INC | ORLY | 11,499.68 | 0.08\% | 0.00\% | 16.68\% | 16.68\% | 0.0137\% |
| OCCIDENTAL PETROLEUM CORP | OXY | 69,619.10 | 0.50\% | 2.71\% | 8.00\% | 10.82\% | 0.0536\% |
| PAYCHEX INC | PAYX | 12,322.71 | 0.09\% | 3.84\% | 9.57\% | 13.59\% | 0.0119\% |
| PEOPLE'S UNITED FINANCIAL | PBCT | 4,323.07 | 0.03\% | 4.91\% | 7.00\% | 12.08\% | 0.0037\% |
| PITNEY BOWES INC | PBI | 2,714.16 | N/A | 11.02\% | N/A | N/A | N/A |
| PACCAR INC | PCAR | 17,101.03 | 0.12\% | 2.63\% | 10.25\% | 13.02\% | 0.0158\% |
| P G \& E CORP | PCG | 18,485.03 | 0.13\% | 4.25\% | 2.73\% | 7.04\% | 0.0093\% |
| PLUM CREEK TIMBER CO | PCL | 7,760.55 | 0.06\% | 3.50\% | 5.00\% | 8.59\% | 0.0047\% |
| PRICELINE.COM INC | PCLN | 35,026.50 | 0.25\% | 0.00\% | 18.17\% | 18.17\% | 0.0453\% |
| PRECISION CASTPARTS CORP | PCP | 27,158.16 | 0.19\% | 0.07\% | 13.96\% | 14.03\% | 0.0271\% |
| METROPCS COMMUNICATIONS INC | PCS | 3,750.27 | 0.03\% | 0.00\% | 12.90\% | 12.90\% | 0.0034\% |
| PATTERSON COS INC | PDCO | 4,034.66 | 0.03\% | 1.52\% | 12.33\% | 13.95\% | 0.0040\% |
| PUBLIC SERVICE ENTERPRISE GP | PEG | 15,885.81 | 0.11\% | 4.52\% | 0.00\% | 4.52\% | 0.0051\% |
| PEPSICO INC | PEP | 116,493.53 | 0.83\% | 2.99\% | 7.58\% | 10.68\% | 0.0886\% |
| PETSMART INC | PETM | 6,814.99 | 0.05\% | 0.96\% | 18.08\% | 19.13\% | 0.0093\% |
| PFIZER INC | PFE | 203,126.05 | 1.45\% | 3.47\% | 3.81\% | 7.35\% | 0.1064\% |
| PRINCIPAL FINANCIAL GROUP | PFG | 9,421.15 | 0.07\% | 2.81\% | 11.50\% | 14.47\% | 0.0097\% |
| PROCTER \& GAMBLE CO/THE | PG | 211,539.06 | 1.51\% | 2.94\% | 8.83\% | 11.89\% | 0.1792\% |
| PROGRESSIVE CORP | PGR | 14,770.38 | 0.11\% | 1.46\% | 8.25\% | 9.77\% | 0.0103\% |
| PARKER HANNIFIN CORP | PH | 14,469.85 | 0.10\% | 1.73\% | 7.57\% | 9.36\% | 0.0096\% |
| PULTEGROUP INC | PHM | 7,681.71 | 0.05\% | 0.00\% | 10.00\% | 10.00\% | 0.0055\% |
| PERKINELMER INC | PKI | 3,900.23 | 0.03\% | 0.82\% | 10.65\% | 11.52\% | 0.0032\% |
| PROLOGIS INC | PLD | 18,173.68 | 0.13\% | 2.88\% | 4.40\% | 7.34\% | 0.0095\% |
| PALL CORP | PLL | 7,613.10 | 0.05\% | 1.26\% | 14.08\% | 15.42\% | 0.0084\% |


|  |  | [4] | [5] | [6] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company | Ticker | Market Capitalization | Weight in Index | $\begin{gathered} \text { Estimated } \\ \text { Dividend Yield } \end{gathered}$ | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| PHILIP MORRIS INTERNATIONAL | PM | 151,552.56 | 1.08\% | 3.99\% | 11.51\% | 15.72\% | 0.1697\% |
| PNC FINANCIAL SERVICES GROUP | PNC | 33,707.52 | 0.24\% | 2.77\% | 3.64\% | 6.46\% | 0.0155\% |
| PENTAIR LTD-REGISTERED | PNR | 11,120.26 | 0.08\% | 1.75\% | 12.50\% | 14.36\% | 0.0114\% |
| PINNACLE WEST CAPITAL | PNW | 6,036.78 | 0.04\% | 3.85\% | 5.00\% | 8.95\% | 0.0038\% |
| PEPCO HOLDINGS INC | POM | 4,598.62 | 0.03\% | 5.39\% | 5.00\% | 10.52\% | 0.0034\% |
| PPG INDUSTRIES INC | PPG | 19,406.22 | 0.14\% | 1.77\% | 8.00\% | 9.84\% | 0.0136\% |
| PPL CORPORATION | PPL | 17,724.58 | 0.13\% | 4.80\% | 0.33\% | 5.14\% | 0.0065\% |
| PERRIGO CO | PRGO | 10,732.64 | 0.08\% | 0.26\% | 12.40\% | 12.67\% | 0.0097\% |
| PRUDENTIAL FINANCIAL INC | PRU | 26,981.40 | 0.19\% | 3.06\% | 12.00\% | 15.25\% | 0.0293\% |
| PUBLIC STORAGE | PSA | 27,390.91 | 0.20\% | 2.89\% | 5.72\% | 8.69\% | 0.0169\% |
| PHILLIPS 66 | PSX | 40,245.61 | 0.29\% | 1.93\% | 7.50\% | 9.51\% | 0.0272\% |
| PVH CORP | PVH | 9,382.58 | 0.07\% | 0.09\% | 14.18\% | 14.28\% | 0.0095\% |
| QUANTA SERVICES INC | PWR | 6,382.99 | 0.05\% | 0.00\% | 17.87\% | 17.87\% | 0.0081\% |
| PRAXAIR INC | PX | 32,880.01 | 0.23\% | 2.16\% | 10.25\% | 12.52\% | 0.0293\% |
| PIONEER NATURAL RESOURCES CO | PXD | 16,356.35 | 0.12\% | 0.07\% | 15.98\% | 16.05\% | 0.0187\% |
| QUALCOMM INC | QCOM | 112,434.42 | 0.80\% | 1.46\% | 15.14\% | 16.72\% | 0.1338\% |
| QEP RESOURCES INC | QEP | 5,398.72 | 0.04\% | 0.26\% | 15.00\% | 15.28\% | 0.0059\% |
| RYDER SYSTEM INC | R | 2,961.50 | 0.02\% | 2.13\% | 9.90\% | 12.14\% | 0.0026\% |
| REYNOLDS AMERICAN INC | RAI | 24,296.54 | 0.17\% | 5.70\% | 7.32\% | 13.22\% | 0.0229\% |
| ROWAN COMPANIES PLC-A | RDC | 4,523.15 | 0.03\% | 0.00\% | 25.53\% | 25.53\% | 0.0082\% |
| REGIONS FINANCIAL CORP | RF | 11,134.46 | 0.08\% | 1.62\% | 8.00\% | 9.69\% | 0.0077\% |
| ROBERT HALF INTL INC | RHI | 5,149.42 | 0.04\% | 1.75\% | 14.33\% | 16.21\% | 0.0059\% |
| RED HAT INC | RHT | 10,451.82 | 0.07\% | 0.00\% | 17.00\% | 17.00\% | 0.0127\% |
| RALPH LAUREN CORP | RL | 16,108.37 | 0.11\% | 0.86\% | 12.00\% | 12.91\% | 0.0148\% |
| ROCKWELL AUTOMATION INC | ROK | 12,708.16 | 0.09\% | 2.09\% | 10.33\% | 12.53\% | 0.0113\% |
| ROPER INDUSTRIES INC | ROP | 11,969.39 | 0.09\% | 0.61\% | 15.00\% | 15.66\% | 0.0133\% |
| ROSS STORES INC | ROST | 13,249.44 | 0.09\% | 1.00\% | 13.20\% | 14.27\% | 0.0135\% |
| RANGE RESOURCES CORP | RRC | 11,658.88 | 0.08\% | 0.22\% | 10.00\% | 10.23\% | 0.0085\% |
| REPUBLIC SERVICES INC | RSG | 11,255.01 | 0.08\% | 3.03\% | 2.30\% | 5.37\% | 0.0043\% |
| RAYTHEON COMPANY | RTN | 17,652.54 | 0.13\% | 4.08\% | 9.00\% | 13.26\% | 0.0167\% |
| SPRINT NEXTEL CORP | S | 17,637.08 | 0.13\% | 0.00\% | 5.00\% | 5.00\% | 0.0063\% |
| SAIC INC | SAI | 4,205.02 | 0.03\% | 3.93\% | 3.75\% | 7.75\% | 0.0023\% |
| STARBUCKS CORP | SBUX | 40,773.16 | 0.29\% | 1.57\% | 18.49\% | 20.20\% | 0.0587\% |
| SCANA CORP | SCG | 6,399.85 | 0.05\% | 4.08\% | 4.50\% | 8.67\% | 0.0040\% |
| SCHWAB (CHARLES) CORP | SCHW | 21,612.92 | 0.15\% | 1.46\% | 18.39\% | 19.98\% | 0.0308\% |
| SPECTRA ENERGY CORP | SE | 19,797.15 | 0.14\% | 4.18\% | 5.50\% | 9.80\% | 0.0138\% |
| SEALED AIR CORP | SEE | 4,483.54 | N/A | 2.22\% | N/A | N/A | N/A |
| SHERWIN-WILLIAMS COITHE | SHW | 16,887.90 | 0.12\% | 1.07\% | 11.09\% | 12.22\% | 0.0147\% |
| SIGMA-ALDRICH | SIAL | 9,336.89 | 0.07\% | 1.11\% | 6.64\% | 7.79\% | 0.0052\% |
| JM SMUCKER CO/THE | SJM | 9,969.99 | 0.07\% | 2.24\% | 7.33\% | 9.65\% | 0.0069\% |
| SCHLUMBERGER LTD | SLB | 105,822.13 | 0.75\% | 1.53\% | 17.00\% | 18.65\% | 0.1406\% |
| SLM CORP | SLM | 8,647.77 | 0.06\% | 3.00\% | -4.30\% | -1.37\% | -0.0008\% |




|  | [4] | [5] | [6] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company Ticker | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | $\begin{aligned} & \text { Weighted } \\ & \text { DCF Result } \end{aligned}$ |
| XEROX CORP XRX | 9,790.18 | 0.07\% | 2.58\% | 10.00\% | 12.70\% | 0.0089\% |
| XYLEM INC XYL | 5,341.58 | 0.04\% | 1.62\% | 5.00\% | 6.66\% | 0.0025\% |
| YAHOO! INC YHOO | 25,285.87 | 0.18\% | 0.00\% | 13.83\% | 13.83\% | 0.0249\% |
| YUM! BRANDS INC YUM | 29,251.86 | 0.21\% | 2.13\% | 12.18\% | 14.43\% | 0.0301\% |
| ZIONS BANCORPORATION ZION | 4,522.09 | 0.03\% | 0.62\% | 7.75\% | 8.39\% | 0.0027\% |
| ZIMMER HOLDINGS INC ZMH | 13,175.75 | 0.09\% | 0.70\% | 10.65\% | 11.39\% | 0.0107\% |
| Total Market Capitalization: | 14,042,969.33 |  |  |  |  | 13.00\% |
| Notes: |  |  |  |  |  |  |
| [1] Equals sum of Col. [9] |  |  |  |  |  |  |
| [2] Source: Bloomberg Professional |  |  |  |  |  |  |
| [3] Equals [1] - [2] |  |  |  |  |  |  |
| [4] Source: Bloomberg Professional |  |  |  |  |  |  |
| [5] Equals weight in S\&P 500 based on market capitalization |  |  |  |  |  |  |
| [6] Source: Bloomberg Professional |  |  |  |  |  |  |
| [7] Source: Bloomberg Professional |  |  |  |  |  |  |
| [8] Equals ([6] $\times(1+(0.5 \times[7]))$ + [7] |  |  |  |  |  |  |
| [9] Equals Col. [5] $\times$ Col. [8] |  |  |  |  |  |  |

Ex-Ante Market Risk Premium Market DCF Method Based - Capital IQ

| $[1]$ | $[2]$ | $[3]$ |
| :---: | :---: | :---: |
| S\&P 500 | Current 30-Year |  |
| Est. Required <br> Market Return | Treasury (30-day <br> average) | Implied Market <br> Risk Premium |
| $12.93 \%$ | $3.12 \%$ | $9.81 \%$ |






|  | [4] | [5] | [6] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company (Ticker) | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| Equifax Inc. (NYSE:EFX) | 6,642.50 | 0.05\% | 1.60\% | 11.90\% | 13.60\% | 0.01\% |
| Equity Residential (NYSE:EQR) | 18,693.90 | 0.13\% | 3.10\% | 8.01\% | 11.23\% | 0.01\% |
| Exelon Corporation (NYSE:EXC) | 26,158.10 | 0.18\% | 6.86\% | -8.70\% | -2.14\% | 0.00\% |
| Expedia Inc. (NasdaqGS:EXPE) | 8,743.40 | 0.06\% | 0.68\% | 13.30\% | 14.03\% | 0.01\% |
| Expeditors International of Washington Inc. (NasdaqGS:EXPD | 8,831.60 | 0.06\% | 1.33\% | 10.70\% | 12.10\% | 0.01\% |
| Express Scripts Holding Company (NasdaqGS:ESRX) | 45,367.30 | 0.32\% | 0.00\% | 16.30\% | 16.30\% | 0.05\% |
| Exxon Mobil Corporation (NYSE:XOM) | 397,796.70 | 2.77\% | 2.58\% | 1.81\% | 4.41\% | 0.12\% |
| F5 Networks, Inc. (NasdaqGS:FFIV) | 7,994.30 | 0.06\% | 0.00\% | 17.80\% | 17.80\% | 0.01\% |
| Family Dollar Stores Inc. (NYSE:FDO) | 6,478.10 | 0.05\% | 1.86\% | 13.20\% | 15.18\% | 0.01\% |
| Fastenal Company (NasdaqGS:FAST) | 15,650.50 | 0.11\% | 0.76\% | 18.30\% | 19.13\% | 0.02\% |
| FedEx Corporation (NYSE:FDX) | 33,465.00 | 0.23\% | 0.53\% | 11.70\% | 12.26\% | 0.03\% |
| Fidelity National Information Services, Inc. (NYSE:FIS) | 10,698.80 | 0.07\% | 2.41\% | 11.70\% | 14.25\% | 0.01\% |
| Fifth Third Bancorp (NasdaqGS:FITB) | 14,154.10 | 0.10\% | 2.49\% | 7.23\% | 9.81\% | 0.01\% |
| First Horizon National Corporation (NYSE:FHN) | 2,587.00 | 0.02\% | 1.88\% | 11.30\% | 13.29\% | 0.00\% |
| First Solar, Inc. (NasdaqGS:FSLR), | 2,966.80 | 0.02\% | 0.00\% | -17.00\% | -17.00\% | 0.00\% |
| FirstEnergy Corp. (NYSE:FE) | 16,967.00 | 0.12\% | 5.42\% | 0.78\% | 6.22\% | 0.01\% |
| Fiserv, Inc. (NasdaqGS:FISV) | 10,794.00 | 0.08\% | 0.00\% | 11.20\% | 11.20\% | 0.01\% |
| FLIR Systems, Inc. (NasdaqGS:FLIR) | 4,011.70 | 0.03\% | 1.35\% | 12.50\% | 13.93\% | 0.00\% |
| Flowserve Corp. (NYSE:FLS) | 7,994.90 | 0.06\% | 0.90\% | 12.80\% | 13.76\% | 0.01\% |
| Fluor Corporation (NYSE:FLR) | 10,741.50 | 0.07\% | 0.99\% | 12.60\% | 13.65\% | 0.01\% |
| FMC Corp. (NYSE:FMC) | 8,170.80 | 0.06\% | 0.91\% | 11.30\% | 12.26\% | 0.01\% |
| FMC Technologies, Inc. (NYSE:FTI) | 12,314.40 | 0.09\% | 0.00\% | 19.00\% | 19.00\% | 0.02\% |
| Ford Motor Co. (NYSE:F) | 49,640.90 | 0.35\% | 3.07\% | 8.09\% | 11.28\% | 0.04\% |
| Forest Laboratories Inc. (NYSE:FRX) | 9,586.20 | 0.07\% | 0.00\% | -14.30\% | -14.30\% | -0.01\% |
| Fossil, Inc. (NasdaqGS:FOSL) | 6,293.80 | 0.04\% | 0.00\% | 18.90\% | 18.90\% | 0.01\% |
| Franklin Resources Inc. (NYSE:BEN) | 30,723.00 | 0.21\% | 2.88\% | 13.20\% | 16.27\% | 0.03\% |
| Freeport-McMoRan Copper \& Gold Inc. (NYSE:FCX) | 33,266.30 | 0.23\% | 3.57\% | 3.00\% | 6.62\% | 0.02\% |
| Frontier Communications Corporation (NasdaqGS:FTR) | 4,088.60 | 0.03\% | 9.77\% | 2.00\% | 11.87\% | 0.00\% |
| GameStop Corp. (NYSE:GME) | 3,074.30 | 0.02\% | 3.94\% | 9.36\% | 13.48\% | 0.00\% |
| Gannett Co., Inc. (NYSE:GCI) | 4,632.50 | 0.03\% | 3.97\% | 5.70\% | 9.78\% | 0.00\% |
| Gap Inc. (NYSE:GPS) | 15,763.30 | 0.11\% | 1.52\% | 12.00\% | 13.61\% | 0.01\% |
| Garmin Ltd. (NasdaqGS:GRMN) | 7,631.10 | 0.05\% | 4.60\% | 7.60\% | 12.37\% | 0.01\% |
| General Dynamics Corp. (NYSE:GD) | 23,468.60 | 0.16\% | 3.07\% | 5.62\% | 8.78\% | 0.01\% |
| General Electric Company (NYSE:GE) | 244,225.90 | 1.70\% | 3.26\% | 10.70\% | 14.13\% | 0.24\% |
| General Mills, Inc. (NYSE:GIS) | 28,831.70 | 0.20\% | 2.96\% | 7.57\% | 10.64\% | 0.02\% |
| Genuine Parts Company (NYSE:GPC) | 11,082.60 | 0.08\% | 2.77\% | 8.17\% | 11.05\% | 0.01\% |
| Genworth Financial Inc. (NYSE:GNW) | 4,456.60 | 0.03\% | 0.00\% | 16.00\% | 16.00\% | 0.00\% |
| Gilead Sciences Inc. (NasdaqGS:GILD) | 63,197.20 | 0.44\% | 0.00\% | 24.30\% | 24.30\% | 0.11\% |
| Goodyear Tire \& Rubber Co. (NasdaqGS:GT) | 3,460.20 | 0.02\% | 0.00\% | 45.10\% | 45.10\% | 0.01\% |
| Google Inc. (NasdaqGS:GOOG) | 261,386.70 | 1.82\% | 0.00\% | 15.70\% | 15.70\% | 0.29\% |
| H\&R Block, Inc. (NYSE:HRB) | 6,809.50 | 0.05\% | 3.19\% | 11.00\% | 14.37\% | 0.01\% |
| H. J. Heinz Company (NYSE:HNZ) | 23,177.20 | 0.16\% | 2.85\% | 6.86\% | 9.81\% | 0.02\% |
| Halliburton Company (NYSE:HAL) | 39,788.40 | 0.28\% | 0.84\% | 17.60\% | 18.52\% | 0.05\% |

[^21]


|  | [4] | [5] | [6] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company (Ticker) | $\begin{gathered} \text { Market } \\ \text { Capitalization } \end{gathered}$ | Weight in Index |  | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| Mondelez International, Inc. (NasdaqGS:MDLZ) | 47,483.80 | 0.33\% | 1.95\% | 12.00\% | 14.07\% | 0.05\% |
| Monsanto Company (NYSE:MON) | 55,373.70 | 0.39\% | 1.45\% | 12.50\% | 14.04\% | 0.05\% |
| Monster Beverage Corporation (NasdaqGS:MNST) | 8,753.60 | 0.06\% | 0.00\% | 18.10\% | 18.10\% | 0.01\% |
| Moody's Corp. (NYSE:MCO) | 10,450.40 | 0.07\% | 1.71\% | 12.80\% | 14.62\% | 0.01\% |
| Morgan Stanley (NYSE:MS) | 47,120.40 | 0.33\% | 0.84\% | 12.90\% | 13.79\% | 0.05\% |
| Motorola Solutions, Inc. (NYSE:MSI) | 16,953.60 | 0.12\% | 1.69\% | 24.00\% | 25.89\% | 0.03\% |
| Murphy Oil Corporation (NYSE:MUR) | 11,922.60 | 0.08\% | 2.04\% | 11.70\% | 13.86\% | 0.01\% |
| Mylan, Inc. (NasdaqGS:MYL) | 11,908.00 | 0.08\% | 0.00\% | 10.10\% | 10.10\% | 0.01\% |
| Nabors Industries Ltd. (NYSE:NBR) | 5,134.00 | 0.04\% | 0.00\% | 9.07\% | 9.07\% | 0.00\% |
| Nasdaq OMX Group Inc. (NasdaqGS:NDAQ) | 5,124.60 | 0.04\% | 1.67\% | 9.80\% | 11.55\% | 0.00\% |
| National Oilwell Varco, Inc. (NYSE:NOV) | 29,598.90 | 0.21\% | 0.75\% | 13.70\% | 14.50\% | 0.03\% |
| NetApp, Inc. (NasdaqGS:NTAP) | 13,095.30 | 0.09\% | 0.00\% | 12.90\% | 12.90\% | 0.01\% |
| Netflix, Inc. (NasdaqGS:NFLX) | 10,611.40 | 0.07\% | 0.00\% | 28.70\% | 28.70\% | 0.02\% |
| Newell Rubbermaid Inc. (NYSE:NWL) | 6,954.20 | 0.05\% | 2.48\% | 8.84\% | 11.43\% | 0.01\% |
| Newfield Exploration Co. (NYSE:NFX) | 3,603.30 | 0.03\% | 0.00\% | 5.80\% | 5.80\% | 0.00\% |
| Newmont Mining Corp. (NYSE:NEM) | 21,480.70 | 0.15\% | 3.24\% | -2.50\% | 0.70\% | 0.00\% |
| News Corp. (NasdaqGS:NWSA) | 67,533.90 | 0.47\% | 0.59\% | 16.00\% | 16.64\% | 0.08\% |
| NextEra Energy, Inc. (NYSE:NEE) | 30,682.40 | 0.21\% | 3.64\% | 5.87\% | 9.62\% | 0.02\% |
| Nike Inc. (NYSE:NKE) | 49,219.40 | 0.34\% | 1.53\% | 11.40\% | 13.02\% | 0.04\% |
| NiSource Inc. (NYSE:NI) | 8,295.20 | 0.06\% | 3.58\% | 7.87\% | 11.59\% | 0.01\% |
| Noble Corp. (NYSE:NE) | 9,883.90 | 0.07\% | 1.44\% | 28.30\% | 29.94\% | 0.02\% |
| Noble Energy, Inc. (NYSE:NBL) | 20,011.30 | 0.14\% | 0.89\% | 8.15\% | 9.08\% | 0.01\% |
| Nordstrom Inc. (NYSE:JWN) | 11,085.20 | 0.08\% | 1.95\% | 12.90\% | 14.98\% | 0.01\% |
| Norfolk Southern Corp. (NYSE:NSC) | 22,487.90 | 0.16\% | 2.80\% | 11.70\% | 14.66\% | 0.02\% |
| Northeast Utilities (NYSE:NU) | 12,852.80 | 0.09\% | 3.59\% | 6.40\% | 10.10\% | 0.01\% |
| Northern Trust Corporation (NasdaqGS:NTRS) | 12,774.80 | 0.09\% | 2.24\% | 12.80\% | 15.18\% | 0.01\% |
| Northrop Grumman Corporation (NYSE:NOC) | 15,562.60 | 0.11\% | 3.35\% | 1.58\% | 4.96\% | 0.01\% |
| NRG Energy, Inc. (NYSE:NRG) | 5,465.40 | 0.04\% | 1.50\% | 21.00\% | 22.66\% | 0.01\% |
| Nucor Corporation (NYSE:NUE) | 15,284.70 | 0.11\% | 3.05\% | 7.13\% | 10.29\% | 0.01\% |
| NVIDIA Corporation (NasdaqGS:NVDA) | 7,955.00 | 0.06\% | 2.51\% | 11.80\% | 14.46\% | 0.01\% |
| NYSE Euronext, Inc. (NYSE:NYX) | 9,131.90 | 0.06\% | 3.41\% | 12.10\% | 15.72\% | 0.01\% |
| O'Reilly Automotive Inc. (NasdaqGS:ORLY) | 11,444.30 | 0.08\% | 0.00\% | 16.00\% | 16.00\% | 0.01\% |
| Occidental Petroleum Corporation (NYSE:OXY) | 68,233.90 | 0.48\% | 3.02\% | 3.93\% | 7.01\% | 0.03\% |
| Omnicom Group Inc. (NYSE:OMC) | 15,245.90 | 0.11\% | 2.77\% | 9.91\% | 12.82\% | 0.01\% |
| ONEOK Inc. (NYSE:OKE) | 9,770.30 | 0.07\% | 3.02\% | 15.00\% | 18.25\% | 0.01\% |
| Oracle Corporation (NasdaqGS:ORCL) | 164,800.90 | 1.15\% | 0.69\% | 12.40\% | 13.13\% | 0.15\% |
| Owens-Illinois, Inc. (NYSE:OI) | 4,300.40 | 0.03\% | 0.00\% | 9.76\% | 9.76\% | 0.00\% |
| PACCAR Inc. (NasdaqGS:PCAR) | 16,995.00 | 0.12\% | 1.66\% | 11.00\% | 12.75\% | 0.02\% |
| Pall Corporation (NYSE:PLL) | 7,610.80 | 0.05\% | 1.46\% | 12.50\% | 14.05\% | 0.01\% |
| Parker-Hannifin Corporation (NYSE:PH) | 14,325.10 | 0.10\% | 1.79\% | 4.60\% | 6.43\% | 0.01\% |
| Patterson Companies, Inc. (NasdaqGS:PDCO) | 4,043.40 | 0.03\% | 1.50\% | 10.60\% | 12.18\% | 0.00\% |
| Paychex, Inc. (NasdaqGS:PAYX) | 12,355.40 | 0.09\% | 3.89\% | 9.75\% | 13.83\% | 0.01\% |
| Peabody Energy Corp. (NYSE:BTU) | 6,548.60 | 0.05\% | 1.39\% | 12.00\% | 13.47\% | 0.01\% |




|  | ［4］ | ［5］ | ［6］ | ［7］ | ［8］ | ［9］ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company（Ticker） | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long－Term Growth Est． | DCF Result | Weighted DCF Result |  |
| Texas Instruments Inc．（NasdaqGs：TXN） | 37，642．20 | 0．26\％ | 2．50\％ | 8．23\％ | 10．83\％ | 0．03\％ |  |
| Textron Inc．（NYSE：TXT） | 7，980．70 | 0．06\％ | 0．27\％ | 22．30\％ | 22．60\％ | 0．01\％ |  |
| The ADT Corporation（NYSE：ADT） | 10，775．30 | 0．08\％ | 1．08\％ | 11．10\％ | 12．24\％ | 0．01\％ |  |
| The AES Corporation（NYSE：AES） | 8，310．00 | 0．06\％ | 1．43\％ | 7．30\％ | 8．78\％ | 0．01\％ |  |
| The Allstate Corporation（NYSE：ALL） | 21，962．20 | 0．15\％ | 2．18\％ | 9．13\％ | 11．41\％ | 0．02\％ |  |
| The Bank of New York Mellon Corporation（NYSE：BK） | 32，566．10 | 0．23\％ | 1．86\％ | 12．80\％ | 14．78\％ | 0．03\％ |  |
| The Boeing Company（NYSE：BA） | 56，735．10 | 0．40\％ | 2．59\％ | 11．90\％ | 14．64\％ | 0．06\％ |  |
| The Charles Schwab Corporation（NYSE：SCHW） | 21，549．20 | 0．15\％ | 1．42\％ | 15．50\％ | 17．03\％ | 0．03\％ |  |
| The Chubb Corporation（NYSE：CB） | 21，931．00 | 0．15\％ | 1．96\％ | 9．55\％ | 11．60\％ | 0．02\％ |  |
| The Clorox Company（NYSE：CLX） | 10，706．10 | 0．07\％ | 3．13\％ | 8．49\％ | 11．75\％ | 0．01\％ |  |
| The Coca－Cola Company（NYSE：KO） | 167，834．80 | 1．17\％ | 2．73\％ | 9．40\％ | 12．26\％ | 0．14\％ |  |
| The Dow Chemical Company（NYSE：DOW） | 38，732．30 | 0．27\％ | 3．98\％ | 8．70\％ | 12．85\％ | 0．03\％ |  |
| The Estee Lauder Companies Inc．（NYSE：EL） | 24，401．30 | 0．17\％ | 1．14\％ | 13．80\％ | 15．02\％ | 0．03\％ |  |
| The Goldman Sachs Group，Inc．（NYSE：GS） | 74，627．70 | 0．52\％ | 1．29\％ | 9．26\％ | 10．61\％ | 0．06\％ |  |
| The Hartford Financial Services Group，Inc．（NYSE：HIG） | 10，558．70 | 0．07\％ | 1．65\％ | 14．70\％ | 16．47\％ | 0．01\％ |  |
| The Hershey Company（NYSE：HSY） | 18，063．70 | 0．13\％ | 2．08\％ | 8．90\％ | 11．07\％ | 0．01\％ |  |
| The Home Depot，Inc．（NYSE：HD） | 100，954．50 | 0．70\％ | 1．72\％ | 15．80\％ | 17．66\％ | 0．12\％ |  |
| The Interpublic Group of Companies，Inc．（NYSE：IPG） | 5，422．50 | 0．04\％ | 1．91\％ | 16．40\％ | 18．47\％ | 0．01\％ |  |
| The J．M．Smucker Company（NYSE：SJM） | 10，022．10 | 0．07\％ | 2．25\％ | 8．66\％ | 11．01\％ | 0．01\％ |  |
| The Kroger Co．（NYSE：KR） | 14，459．10 | 0．10\％ | 2．15\％ | 9．21\％ | 11．46\％ | 0．01\％ |  |
| The McGraw－Hill Companies，Inc．（NYSE：MHP） | 12，482．60 | 0．09\％ | 2．49\％ | 17．90\％ | 20．61\％ | 0．02\％ |  |
| The Mosaic Company（NYSE：MOS） | 26，469．40 | 0．18\％ | 1．61\％ | 7．45\％ | 9．12\％ | 0．02\％ |  |
| The Sherwin－Williams Company（NYSE：SHW） | 17，187．90 | 0．12\％ | 1．20\％ | 15．50\％ | 16．79\％ | 0．02\％ |  |
| The TJX Companies，Inc．（NYSE：TJX） | 32，823．70 | 0．23\％ | 1．02\％ | 12．30\％ | 13．38\％ | 0．03\％ |  |
| The Travelers Companies，Inc．（NYSE：TRV） | 30，339．20 | 0．21\％ | 2．29\％ | 8．17\％ | 10．55\％ | 0．02\％ |  |
| The Walt Disney Company（NYSE：DIS） | 100，400．30 | 0．70\％ | 1．35\％ | 11．00\％ | 12．42\％ | 0．09\％ |  |
| The Washington Post Company（NYSE：WPO） | 3，057．60 | 0．02\％ | 2．36\％ | 0．00\％ | 2．36\％ | 0．00\％ |  |
| The Western Union Company（NYSE：WU） | 8，238．20 | 0．06\％ | 3．47\％ | 9．39\％ | 13．02\％ | 0．01\％ |  |
| Thermo Fisher Scientific，Inc．（NYSE：TMO） | 26，810．80 | 0．19\％ | 0．81\％ | 12．00\％ | 12．85\％ | 0．02\％ |  |
| Tiffany \＆Co．（NYSE：TIF） | 8，212．40 | 0．06\％ | 1．98\％ | 14．20\％ | 16．32\％ | 0．01\％ |  |
| Time Warner Cable Inc．（NYSE：TWC） | 25，692．00 | 0．18\％ | 2．99\％ | 11．90\％ | 15．07\％ | 0．03\％ |  |
| Time Warner Inc．（NYSE：TWX） | 49，880．60 | 0．35\％ | 2．15\％ | 10．60\％ | 12．86\％ | 0．04\％ | H O H O |
| Torchmark Corp．（NYSE：TMK） | 5，336．00 | 0．04\％ | 1．07\％ | 9．77\％ | 10．89\％ | 0．00\％ | 気贮枵它足 |
| Total System Services，Inc．（NYSE：TSS） | 4，347．70 | 0．03\％ | 1．72\％ | 11．20\％ | 13．02\％ | 0．00\％ | 或國四回 |
| TripAdvisor Inc．（NasdaqGS：TRIP） | 6，347．20 | 0．04\％ | 0．00\％ | 18．20\％ | 18．20\％ | 0．01\％ |  |
| Tyco International Ltd．（NYSE：TYC） | 14，935．90 | 0．10\％ | 2．16\％ | 16．10\％ | 18．43\％ | 0．02\％ |  |
| Tyson Foods，Inc．（NYSE：TSN） | 8，512．40 | 0．06\％ | 0．83\％ | 8．50\％ | 9．37\％ | 0．01\％ | ＊ |
| U．S．Bancorp（NYSE：USB） | 63，377．80 | 0．44\％ | 2．30\％ | 7．80\％ | 10．19\％ | 0．04\％ |  |
| Union Pacific Corporation（NYSE：UNP） | 64，214．20 | 0．45\％ | 2．02\％ | 13．70\％ | 15．86\％ | 0．07\％ | ¢N． |
| United Parcel Service，Inc．（NYSE：UPS） | 79，640．80 | 0．55\％ | 2．97\％ | 10．50\％ | 13．63\％ | 0．08\％ | へ さ は |
| United States Steel Corp．（NYSE：X） | 3，341．60 | 0．02\％ | 0．86\％ | 5．33\％ | 6．22\％ | 0．00\％ | N O W |
| United Technologies Corp．（NYSE：UTX） | 83，212．60 | 0．58\％ | 2．36\％ | 12．30\％ | 14．81\％ | 0．09\％ | Н H A |
| UnitedHealth Group Incorporated（NYSE：UNH） | 58，748．70 | 0．41\％ | 1．48\％ | 11．30\％ | 12．86\％ | 0．05\％ | い |


|  | [4] | [5] | [6] | [7] | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company (Ticker) | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Term Growth Est. | DCF Result | Weighted DCF Result |
| Unum Group (NYSE:UNM) | 6,609.20 | 0.05\% | 2.13\% | 8.70\% | 10.92\% | 0.01\% |
| Urban Outfitters Inc. (NasdaqGS:URBN) | 6,024.70 | 0.04\% | 0.00\% | 17.60\% | 17.60\% | 0.01\% |
| V.F. Corporation (NYSE:VFC) | 17,391.60 | 0.12\% | 2.20\% | 12.30\% | 14.64\% | 0.02\% |
| Valero Energy Corporation (NYSE:VLO) | 26,176.90 | 0.18\% | 1.69\% | 10.40\% | 12.18\% | 0.02\% |
| Varian Medical Systems, Inc. (NYSE:VAR) | 7,643.40 | 0.05\% | 0.00\% | 12.10\% | 12.10\% | 0.01\% |
| Ventas, Inc. (NYSE:VTR) | 20,532.20 | 0.14\% | 3.86\% | 6.18\% | 10.16\% | 0.01\% |
| VeriSign, Inc. (NasdaqGS:VRSN) | 7,077.50 | 0.05\% | 5.96\% | 14.50\% | 20.89\% | 0.01\% |
| Verizon Communications Inc. (NYSE:VZ) | 126,939.60 | 0.88\% | 4.64\% | 8.50\% | 13.34\% | 0.12\% |
| Viacom, Inc. (NasdaqGS:VIAB) | 29,568.60 | 0.21\% | 1.85\% | 12.90\% | 14.87\% | 0.03\% |
| Visa Inc. (NYSE:V) | 104,456.80 | 0.73\% | 0.84\% | 18.90\% | 19.81\% | 0.14\% |
| Vornado Realty Trust (NYSE:VNO) | 15,801.70 | 0.11\% | 3.44\% | -4.25\% | -0.88\% | 0.00\% |
| Vulcan Materials Company (NYSE:VMC) | 7,131.70 | 0.05\% | 0.07\% | 9.50\% | 9.58\% | 0.00\% |
| W.W. Grainger, Inc. (NYSE:GWW) | 15,943.80 | 0.11\% | 1.39\% | 14.20\% | 15.69\% | 0.02\% |
| Wal-Mart Stores Inc. (NYSE:WMT) | 231,825.00 | 1.61\% | 2.29\% | 9.80\% | 12.20\% | 0.20\% |
| Walgreen Co. (NYSE:WAG) | 38,891.10 | 0.27\% | 2.67\% | 12.80\% | 15.64\% | 0.04\% |
| Waste Management, Inc. (NYSE:WM) | 17,068.20 | 0.12\% | 3.98\% | 5.35\% | 9.44\% | 0.01\% |
| Waters Corp. (NYSE:WAT) | 8,052.80 | 0.06\% | 0.00\% | 10.30\% | 10.30\% | 0.01\% |
| WellPoint Inc. (NYSE:WLP) | 19,039.20 | 0.13\% | 1.83\% | 10.80\% | 12.73\% | 0.02\% |
| Wells Fargo \& Company (NYSE:WFC) | 185,163.10 | 1.29\% | 2.84\% | 8.27\% | 11.23\% | 0.14\% |
| Western Digital Corporation (NasdaqGS:WDC) | 11,693.90 | 0.08\% | 2.06\% | 4.07\% | 6.17\% | 0.01\% |
| Weyerhaeuser Co. (NYSE:WY) | 16,388.10 | 0.11\% | 2.22\% | 5.00\% | 7.28\% | 0.01\% |
| Whirlpool Corp. (NYSE:WHR) | 8,795.10 | 0.06\% | 1.80\% | 0.00\% | 1.80\% | 0.00\% |
| Whole Foods Market, Inc. (NasdaqGS:WFM) | 16,337.40 | 0.11\% | 0.91\% | 17.80\% | 18.79\% | 0.02\% |
| Williams Companies, Inc. (NYSE:WMB) | 23,666.50 | 0.16\% | 3.86\% | 13.60\% | 17.72\% | 0.03\% |
| Windstream Corporation (NasdaqGS:WIN) | 5,252.00 | 0.04\% | 11.20\% | 5.57\% | 17.08\% | 0.01\% |
| Wisconsin Energy Corp. (NYSE:WEC) | 9,152.20 | 0.06\% | 3.42\% | 5.22\% | 8.73\% | 0.01\% |
| WPX Energy, Inc. (NYSE:WPX) | 2,940.00 | N/A | 0.00\% | 0.00\% | N/A | N/A |
| Wyndham Worldwide Corporation (NYSE:WYN) | 8,117.50 | 0.06\% | 1.95\% | 19.20\% | 21.34\% | 0.01\% |
| Wynn Resorts Ltd. (NasdaqGS:WYNN) | 15,282.30 | 0.11\% | 9.35\% | 10.10\% | 19.92\% | 0.02\% |
| Xcel Energy Inc. (NYSE:XEL) | 13,707.00 | 0.10\% | 3.84\% | 5.04\% | 8.98\% | 0.01\% |
| Xerox Corp. (NYSE:XRX) | 9,753.50 | 0.07\% | 2.89\% | 8.60\% | 11.61\% | 0.01\% |
| Xilinx Inc. (NasdaqGS:XLNX) | 9,970.70 | 0.07\% | 2.31\% | 11.30\% | 13.74\% | 0.01\% |
| XL Group plc (NYSE:XL) | 8,618.40 | 0.06\% | 1.53\% | 8.75\% | 10.35\% | 0.01\% |
| Xylem Inc. (NYSE:XYL) | 5,254.30 | 0.04\% | 1.65\% | 7.76\% | 9.47\% | 0.00\% |
| Yahoo! Inc. (NasdaqGS:YHOO) | 24,854.20 | 0.17\% | 0.00\% | 12.30\% | 12.30\% | 0.02\% |
| Yum! Brands, Inc. (NYSE:YUM) | 28,911.30 | 0.20\% | 2.09\% | 11.90\% | 14.11\% | 0.03\% |
| Zimmer Holdings, Inc. (NYSE:ZMH) | 13,168.80 | 0.09\% | 0.95\% | 9.37\% | 10.36\% | 0.01\% |
| Zions Bancorp. (NasdaqGS:ZION) | 4,483.40 | 0.03\% | 0.16\% | 10.50\% | 10.67\% | 0.00\% |
| Total Market C | 14,359,514.00 |  |  |  |  | 12.93\% |

Notes:
Total Market Capitalization: $14,359,514.00$
[1] Equals sum of Col. [9]
[2] Source: Bloomberg Professional
[3] Equals [1] - [2]

|  | [4] | [5] | [6] | 71 | [8] | [9] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Company (Ticker) | Market Capitalization | Weight in Index | Estimated Dividend Yield | Long-Tem Growth Est. | DCF Result | Weighted DCF Result |

[4] Source: Capital IQ
[5] Equals weight in S\&P 500 based on market capitalization
[6] Source: Capital IQ
[7] Source: Capital 10
[8] Equals $([6] \times(1+(0.5 \times[7])))+[7]$
[9] Equals Col. [5] $\times$ Col. [8]

Bloomberg and Value Line Beta Coefficients

|  |  | [1] | [2] |
| :---: | :---: | :---: | :---: |
| Company | Ticker | Bloomberg | Value Line |
| American Electric Power Company, Inc. | AEP | 0.627 | 0.65 |
| Cleco Corp. | CNL | 0.770 | 0.65 |
| Empire District Electric | EDE | 0.759 | 0.65 |
| Great Plains Energy Inc. | GXP | 0.767 | 0.75 |
| IDACORP, Inc. | IDA | 0.806 | 0.70 |
| Otter Tail Corporation | OTTR | 0.766 | 0.90 |
| Pinnacle West Capital Corp. | PNW | 0.715 | 0.70 |
| PNM Resources, Inc. | PNM | 0.680 | 0.90 |
| Portland General Electric Company | POR | 0.748 | 0.75 |
| Southern Company | SO | 0.523 | 0.55 |
| Westar Energy, Inc. | WR | 0.695 | 0.70 |
| Mean |  | 0.714 | 0.72 |

Notes:
[1] Source: Bloomberg Professional
[2] Source: Value Line


Capital Asset Pricing Model Results
Sharpe Ratio, Bloomberg, and Capital IQ Derived Market Risk Premium


## Notes:

[1] See Notes [9], [10] and [11]
[2] Source: Exhibit No. RBH-3
[3] Source: Exhibit No. RBH-2
[4] Source: Exhibit No. RBH-2
[5] Source: Exhibit No. RBH-2
[6] Equals Col. [1] + (Col. [2] $\times$ Col. [3]
[7] Equals Col. [1] + (Col. [2] $\times$ Col. [4])
[8] Equals Col. [1] + (Col. [2] x Col. [5])
[9] Source: Bloomberg Professional
[10] Source: Blue Chip Financial Forecasts, Vol. 32, No. 2, February 1, 2012, at 2
[11] Source: Blue Chip Financial Forecasts, Vol. 31, No. 12, December 1, 2012, at 14

## Bond Yield Plus Risk Premium Analysis

|  | [1] Constant | [2] Slope | [3] 30-Year <br> Treasury Yield | [4] <br> Risk Premium | [5] <br> Return on Equity |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Current | -3.08\% | -2.94\% | 3.12\% | 7.11\% | 10.23\% |
| Near Term Projected | -3.08\% | -2.94\% | 3.25\% | 6.99\% | 10.24\% |
| Long Term Projected | -3.08\% | -2.94\% | 5.10\% | 5.66\% | 10.76\% |

Notes:
[1] Constant of regression equation
[2] Slope of regression equation
[3] Source: Current = Bloomberg Professional,
Near Term Projected = Blue Chip Financial Forecasts, Vol. 32, No. 2, February 1, 2012, at 2,
Long-Term Projected = Blue Chip Financial Forecasts, Vol. 31, No. 12, December 1, 2012, at 14
[4] Equals [1] + [2] $\times \ln ([3])$
[5] Equals [3] + [4]
[6] Source: SNL Financial
[7] Source: SNL Financial
[8] Source: Bloomberg Professional, equals 201-trading day average (i.e. lag period)
[9] Equals [7] - [8]


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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> $\begin{array}{c}\text { Risk } \\ \text { Premium }\end{array}$ |
| :---: | :---: | :---: | :---: |
| 1/1/1980 | 14.50\% | 9.36\% | 5.14\% |
| 1/7/1980 | 14.39\% | 9.38\% | 5.01\% |
| 1/9/1980 | 15.00\% | 9.39\% | 5.61\% |
| 1/14/1980 | 15.17\% | 9.41\% | 5.76\% |
| 1/17/1980 | 13.93\% | 9.43\% | 4.50\% |
| 1/23/1980 | 15.50\% | 9.47\% | 6.03\% |
| 1/30/1980 | 13.86\% | 9.52\% | 4.34\% |
| 1/31/1980 | 12.61\% | 9.53\% | 3.08\% |
| 216/1980 | 13.71\% | 9.58\% | 4.13\% |
| 2/13/1980 | 12.80\% | 9.63\% | 3.17\% |
| 2/14/1980 | 13.00\% | 9.64\% | 3.36\% |
| 2/19/1980 | 13.50\% | 9.68\% | 3.82\% |
| 2/27/1980 | 13.75\% | 9.78\% | 3.97\% |
| 2/29/1980 | 13.75\% | 9.81\% | 3.94\% |
| 2/29/1980 | 14.00\% | 9.81\% | 4.19\% |
| 2/29/1980 | 14.77\% | 9.81\% | 4.96\% |
| 3/7/1980 | 12.70\% | 9.89\% | 2.81\% |
| 3/14/1980 | 13.50\% | 9.96\% | 3.54\% |
| 3/26/1980 | 14.16\% | 10.09\% | 4.07\% |
| 3/27/1980 | 14.24\% | 10.11\% | 4.13\% |
| 3/28/1980 | 14.50\% | 10.13\% | 4.37\% |
| 4/11/1980 | 12.75\% | 10.27\% | 2.48\% |
| 4/14/1980 | 13.85\% | 10.28\% | 3.57\% |
| 4/16/1980 | 15.50\% | 10.30\% | 5.20\% |
| 4/22/1980 | 13.25\% | 10.34\% | 2.91\% |
| 4/22/1980 | 13.90\% | 10.34\% | 3.56\% |
| 4/24/1980 | 16.80\% | 10.37\% | 6.43\% |
| 4/29/1980 | 15.50\% | 10.40\% | 5.10\% |
| 5/6/1980 | 13.70\% | 10.44\% | 3.26\% |
| 577/1980 | 15.00\% | 10.45\% | 4.55\% |
| 5/8/1980 | 13.75\% | 10.45\% | 3.30\% |
| 5/9/1980 | 14.35\% | 10.46\% | 3.89\% |
| 5/13/1980 | 13.60\% | 10.47\% | 3.13\% |
| 5/15/1980 | 13.25\% | 10.49\% | 2.76\% |
| 5/19/1980 | 13.75\% | 10.50\% | 3.25\% |
| 5/27/1980 | 13.62\% | 10.53\% | 3.09\% |
| 5/27/1980 | 14.60\% | 10.53\% | 4.07\% |
| 5/29/1980 | 16.00\% | 10.55\% | 5.45\% |
| 5/30/1980 | 13.80\% | 10.56\% | 3.24\% |
| 6/2/1980 | 15.63\% | 10.56\% | 5.07\% |
| 6/9/1980 | 15.90\% | 10.59\% | 5.31\% |
| 6/10/1980 | 13.78\% | 10.59\% | 3.19\% |
| 6/12/1980 | 14.25\% | 10.60\% | 3.65\% |
| 6/19/1980 | 13.40\% | 10.61\% | 2.79\% |
| 6/30/1980 | 13.00\% | 10.64\% | 2.36\% |
| 6/30/1980 | 13.40\% | 10.64\% | 2.76\% |
| 7/9/1980 | 14.75\% | 10.67\% | 4.08\% |
| 7/10/1980 | 15.00\% | 10.67\% | 4.33\% |
| 7/15/1980 | 15.80\% | 10.69\% | 5.11\% |
| 7/18/1980 | 13.80\% | 10.70\% | 3.10\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 7/22/1980 | 14.10\% | 10.71\% | 3.39\% |
| 7/24/1980 | 15.00\% | 10.72\% | 4.28\% |
| 7/25/1980 | 13.48\% | 10.73\% | 2.75\% |
| 7/31/1980 | 14.58\% | 10.75\% | 3.83\% |
| 8/8/1980 | 13.50\% | 10.77\% | 2.73\% |
| 8/8/1980 | 14.00\% | 10.77\% | 3.23\% |
| 8/8/1980 | 15.45\% | 10.77\% | 4.68\% |
| 8/11/1980 | 14.85\% | 10.78\% | 4.07\% |
| 8/14/1980 | 14.00\% | 10.79\% | 3.21\% |
| 8/14/1980 | 16.25\% | 10.79\% | 5.46\% |
| 8/25/1980 | 13.75\% | 10.82\% | 2.93\% |
| 8/27/1980 | 13.80\% | 10.83\% | 2.97\% |
| 8/29/1980 | 12.50\% | 10.83\% | 1.67\% |
| 9/15/1980 | 13.50\% | 10.87\% | 2.63\% |
| 9/15/1980 | 13.93\% | 10.87\% | 3.06\% |
| 9/15/1980 | 15.80\% | 10.87\% | 4.93\% |
| 9/24/1980 | 12.50\% | 10.92\% | 1.58\% |
| 9/24/1980 | 15.00\% | 10.92\% | 4.08\% |
| 9/26/1980 | 13.75\% | 10.94\% | 2.81\% |
| 9/30/1980 | 14.10\% | 10.96\% | 3.14\% |
| 9/30/1980 | 14.20\% | 10.96\% | 3.24\% |
| 10/1/1980 | 13.90\% | 10.96\% | 2.94\% |
| 10/3/1980 | 15.50\% | 10.98\% | 4.52\% |
| 10/7/1980 | 12.50\% | 10.99\% | 1.51\% |
| 10/9/1980 | 13.25\% | 11.00\% | 2.25\% |
| 10/9/1980 | 14.50\% | 11.00\% | 3.50\% |
| 10/9/1980 | 14.50\% | 11.00\% | 3.50\% |
| 10/16/1980 | 16.10\% | 11.02\% | 5.08\% |
| 10/17/1980 | 14.50\% | 11.03\% | 3.47\% |
| 10/31/1980 | 13.75\% | 11.10\% | 2.65\% |
| 10/31/1980 | 14.25\% | 11.10\% | 3.15\% |
| 11/4/1980 | 15.00\% | 11.11\% | 3.89\% |
| 11/5/1980 | 13.75\% | 11.12\% | 2.63\% |
| 11/5/1980 | 14.00\% | 11.12\% | 2.88\% |
| 11/8/1980 | 13.75\% | 11.14\% | 2.61\% |
| 11/10/1980 | 14.85\% | 11.15\% | 3.70\% |
| 11/17/1980 | 14.00\% | 11.18\% | 2.82\% |
| 11/18/1980 | 14.00\% | 11.19\% | 2.81\% |
| 11/19/1980 | 13.00\% | 11.19\% | 1.81\% |
| 11/24/1980 | 14.00\% | 11.21\% | 2.79\% |
| 11/26/1980 | 14.00\% | 11.21\% | 2.79\% |
| 12/8/1980 | 14.15\% | 11.23\% | 2.92\% |
| 12/8/1980 | 15.10\% | 11.23\% | 3.87\% |
| 12/9/1980 | 15.35\% | 11.23\% | 4.12\% |
| 12/12/1980 | 15.45\% | 11.23\% | 4.22\% |
| 12/17/1980 | 13.25\% | 11.24\% | 2.01\% |
| 12/18/1980 | 15.80\% | 11.24\% | 4.56\% |
| 12/19/1980 | 14.50\% | 11.24\% | 3.26\% |
| 12/19/1980 | 14.64\% | 11.24\% | 3.40\% |
| 12/22/1980 | 13.45\% | 11.24\% | 2.21\% |
| 12/22/1980 | 15.00\% | 11.24\% | 3.76\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30Year Treasury Yield | [9] $\begin{gathered}\text { Risk } \\ \text { Premium }\end{gathered}$ |
| :---: | :---: | :---: | :---: |
| 12/30/1980 | 14.50\% | 11.22\% | 3.28\% |
| 12/30/1980 | 14.95\% | 11.22\% | 3.73\% |
| 12/31/1980 | 13.39\% | 11.22\% | 2.17\% |
| 1/2/1981 | 15.25\% | 11.22\% | 4.03\% |
| 1/7/1981 | 14.30\% | 11.21\% | 3.09\% |
| 1/19/1981 | 15.25\% | 11.20\% | 4.05\% |
| 1/23/1981 | 13.10\% | 11.20\% | 1.90\% |
| 1/23/1981 | 14.40\% | 11.20\% | 3.20\% |
| 1/26/1981 | 15.25\% | 11.21\% | 4.04\% |
| 1/27/1981 | 15.00\% | 11.21\% | 3.79\% |
| 1/31/1981 | 13.47\% | 11.22\% | 2.25\% |
| 2/3/1981 | 15.25\% | 11.23\% | 4.02\% |
| 215/1981 | 15.75\% | 11.24\% | 4.51\% |
| 2/11/1981 | 15.60\% | 11.28\% | 4.32\% |
| 2/20/1981 | 15.25\% | 11.33\% | 3.92\% |
| 3/11/1981 | 15.40\% | 11.49\% | 3.91\% |
| 3/12/1981 | 14.51\% | 11.50\% | 3.01\% |
| 3/12/1981 | 16.00\% | 11.50\% | 4.50\% |
| 3/13/1981 | 13.02\% | 11.51\% | 1.51\% |
| 3/18/1981 | 16.19\% | 11.54\% | 4.65\% |
| 3/19/1981 | 13.75\% | 11.55\% | 2.20\% |
| 3/23/1981 | 14.30\% | 11.57\% | 2.73\% |
| 3/25/1981 | 15.30\% | 11.60\% | 3.70\% |
| 4/1/1981 | 14.53\% | 11.67\% | 2.86\% |
| 4/3/1981 | 19.10\% | 11.70\% | 7.40\% |
| 4/9/1981 | 15.00\% | 11.77\% | 3.23\% |
| 4/9/1981 | 15.30\% | 11.77\% | 3.53\% |
| 4/9/1981 | 16.50\% | 11.77\% | 4.73\% |
| 4/9/1981 | 17.00\% | 11.77\% | 5.23\% |
| 4/10/1981 | 13.75\% | 11.79\% | 1.96\% |
| 4/13/1981 | 13.57\% | 11.81\% | 1.76\% |
| 4/15/1981 | 15.30\% | 11.84\% | 3.46\% |
| 4/16/1981 | 13.50\% | 11.86\% | 1.64\% |
| 4/17/1981 | 14.10\% | 11.86\% | 2.24\% |
| 4/21/1981 | 14.00\% | 11.89\% | 2.11\% |
| 4/21/1981 | 16.80\% | 11.89\% | 4.91\% |
| 4/24/1981 | 16.00\% | 11.94\% | 4.06\% |
| 4/27/1981 | 12.50\% | 11.96\% | 0.54\% |
| 4/27/1981 | 13.61\% | 11.96\% | 1.65\% |
| 4/29/1981 | 13.65\% | 11.99\% | 1.66\% |
| 4/30/1981 | 13.50\% | 12.01\% | 1.49\% |
| 5/4/1981 | 16.22\% | 12.04\% | 4.18\% |
| 5/5/1981 | 14.40\% | 12.06\% | 2.34\% |
| 577/1981 | 16.25\% | 12.10\% | 4.15\% |
| 577/1981 | 16.27\% | 12.10\% | 4.17\% |
| 5/8/1981 | 13.00\% | 12.12\% | 0.88\% |
| 5/8/1981 | 16.00\% | 12.12\% | 3.88\% |
| 5/12/1981 | 13.50\% | 12.15\% | 1.35\% |
| 5/15/1981 | 15.75\% | 12.21\% | 3.54\% |
| 5/18/1981 | 14.88\% | 12.22\% | 2.66\% |
| 5/20/1981 | 16.00\% | 12.25\% | 3.75\% |

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| [6] <br> Date of Electric Rate Case | [] <br> Return on Equity | [8] Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 5/21/1981 | 14.00\% | 12.27\% | 1.73\% |
| 5/26/1981 | 14.90\% | 12.29\% | 2.61\% |
| 5/27/1981 | 15.00\% | 12.31\% | 2.69\% |
| 5/27/1981 | 15.00\% | 12.31\% | 2.69\% |
| 5/29/1981 | 15.50\% | 12.33\% | 3.17\% |
| 6/1/1981 | 16.50\% | 12.34\% | 4.16\% |
| 6/3/1981 | 14.67\% | 12.36\% | 2.31\% |
| 65/1981 | 13.00\% | 12.38\% | 0.62\% |
| 6/10/1981 | 16.75\% | 12.41\% | 4.34\% |
| 6/17/1981 | 14.40\% | 12.45\% | 1.95\% |
| 6/18/1981 | 16.33\% | 12.46\% | 3.87\% |
| 6/25/1981 | 14.75\% | 12.51\% | 2.24\% |
| 6/26/1981 | 16.00\% | 12.52\% | 3.48\% |
| 6/30/1981 | 15.25\% | 12.54\% | 2.71\% |
| 711/1981 | 15.50\% | 12.55\% | 2.95\% |
| 7/1/1981 | 17.50\% | 12.55\% | 4.95\% |
| 7/10/1981 | 16.00\% | 12.61\% | 3.39\% |
| 7/14/1981 | 16.90\% | 12.63\% | 4.27\% |
| 7/15/1981 | 16.00\% | 12.64\% | 3.36\% |
| 7/17/1981 | 15.00\% | 12.66\% | 2.34\% |
| 7/20/1981 | 15.00\% | 12.67\% | 2.33\% |
| 7/21/1981 | 14.00\% | 12.68\% | 1.32\% |
| 7/28/1981 | 13.48\% | 12.73\% | 0.75\% |
| 7/31/1981 | 13.50\% | 12.77\% | 0.73\% |
| 7/31/1981 | 15.00\% | 12.77\% | 2.23\% |
| 7/31/1981 | 16.00\% | 12.77\% | 3.23\% |
| 8/5/1981 | 15.71\% | 12.82\% | 2.89\% |
| 8/10/1981 | 14.50\% | 12.86\% | 1.64\% |
| 8/11/1981 | 15.00\% | 12.87\% | 2.13\% |
| 8/20/1981 | 13.50\% | 12.94\% | 0.56\% |
| 8/20/1981 | 16.50\% | 12.94\% | 3.56\% |
| 8/24/1981 | 15.00\% | 12.96\% | 2.04\% |
| 8/28/1981 | 15.00\% | 13.01\% | 1.99\% |
| 9/3/1981 | 14.50\% | 13.05\% | 1.45\% |
| 9/10/1981 | 14.50\% | 13.10\% | 1.40\% |
| 9/11/1981 | 16.00\% | 13.11\% | 2.89\% |
| 9/16/1981 | 16.00\% | 13.14\% | 2.86\% |
| 9/17/1981 | 16.50\% | 13.15\% | 3.35\% |
| 9/23/1981 | 15.85\% | 13.19\% | 2.66\% |
| 9/28/1981 | 15.50\% | 13.23\% | 2.27\% |
| 10/9/1981 | 15.75\% | 13.32\% | 2.43\% |
| 10/15/1981 | 16.25\% | 13.36\% | 2.89\% |
| 10/16/1981 | 15.50\% | 13.37\% | 2.13\% |
| 10/16/1981 | 16.50\% | 13.37\% | 3.13\% |
| 10/19/1981 | 14.25\% | 13.38\% | 0.87\% |
| 10/20/1981 | 15.25\% | 13.40\% | 1.85\% |
| 10/20/1981 | 17.00\% | 13.40\% | 3.60\% |
| 10/23/1981 | 16.00\% | 13.44\% | 2.56\% |
| 10/27/1981 | 10.00\% | 13.48\% | -3.48\% |
| 10/29/1981 | 14.75\% | 13.50\% | 1.25\% |
| 10/29/1981 | 16.50\% | 13.50\% | 3.00\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 11/3/1981 | 15.17\% | 13.53\% | 1.64\% |
| 11/5/1981 | 16.60\% | 13.55\% | 3.05\% |
| 11/6/1981 | 15.17\% | 13.55\% | 1.62\% |
| 11/24/1981 | 15.50\% | 13.60\% | 1.90\% |
| 11/25/1981 | 15.25\% | 13.60\% | 1.65\% |
| 11/25/1981 | 15.35\% | 13.60\% | 1.75\% |
| 11/25/1981 | 16.10\% | 13.60\% | 2.50\% |
| 11/25/1981 | 16.10\% | 13.60\% | 2.50\% |
| 12/1/1981 | 15.70\% | 13.61\% | 2.09\% |
| 12/1/1981 | 16.00\% | 13.61\% | 2.39\% |
| 12/1/1981 | 16.49\% | 13.61\% | 2.88\% |
| 12/1/1981 | 16.50\% | 13.61\% | 2.89\% |
| 12/4/1981 | 16.00\% | 13.61\% | 2.39\% |
| 12/11/1981 | 16.25\% | 13.62\% | 2.63\% |
| 12/14/1981 | 14.00\% | 13.62\% | 0.38\% |
| 12/15/1981 | 15.81\% | 13.63\% | 2.18\% |
| 12/15/1981 | 16.00\% | 13.63\% | 2.37\% |
| 12/16/1981 | 15.25\% | 13.63\% | 1.62\% |
| 12/17/1981 | 16.50\% | 13.63\% | 2.87\% |
| 12/18/1981 | 15.45\% | 13.63\% | 1.82\% |
| 12/30/1981 | 14.25\% | 13.66\% | 0.59\% |
| 12/30/1981 | 16.00\% | 13.66\% | 2.34\% |
| 12/30/1981 | 16.25\% | 13.66\% | 2.59\% |
| 12/31/1981 | 16.15\% | 13.67\% | 2.48\% |
| 1/4/1982 | 15.50\% | 13.67\% | 1.83\% |
| 1/11/1982 | 14.50\% | 13.72\% | 0.78\% |
| 1/11/1982 | 17.00\% | 13.72\% | 3.28\% |
| 1/13/1982 | 14.75\% | 13.74\% | 1.01\% |
| 1/14/1982 | 15.75\% | 13.74\% | 2.01\% |
| 1/15/1982 | 15.00\% | 13.75\% | 1.25\% |
| 1/15/1982 | 16.50\% | 13.75\% | 2.75\% |
| 1/22/1982 | 16.25\% | 13.79\% | 2.46\% |
| 1/27/1982 | 16.84\% | 13.81\% | 3.03\% |
| 1/28/1982 | 13.00\% | 13.81\% | -0.81\% |
| 1/29/1982 | 15.50\% | 13.81\% | 1.69\% |
| 2/1/1982 | 15.85\% | 13.82\% | 2.03\% |
| 2/3/1982 | 16.44\% | 13.83\% | 2.61\% |
| 2/8/1982 | 15.50\% | 13.85\% | 1.65\% |
| 2/11/1982 | 16.00\% | 13.87\% | 2.13\% |
| 2/11/1982 | 16.20\% | 13.87\% | 2.33\% |
| 2/17/1982 | 15.00\% | 13.88\% | 1.12\% |
| 2/19/1982 | 15.17\% | 13.89\% | 1.28\% |
| 2/26/1982 | 15.25\% | 13.89\% | 1.36\% |
| 3/1/1982 | 15.03\% | 13.89\% | 1.14\% |
| 3/1/1982 | 16.00\% | 13.89\% | 2.11\% |
| 3/3/1982 | 15.00\% | 13.88\% | 1.12\% |
| 3/3/1982 | 15.00\% | 13.88\% | 1.12\% |
| 3/8/1982 | 17.10\% | 13.88\% | 3.22\% |
| 3/12/1982 | 16.25\% | 13.88\% | 2.37\% |
| 3/17/1982 | 17.30\% | 13.88\% | 3.42\% |
| 3/22/1982 | 15.10\% | 13.88\% | 1.22\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | $\begin{gathered} {[9]} \\ \substack{\text { Risk } \\ \text { Premium }} \end{gathered}$ |
| :---: | :---: | :---: | :---: |
| 3/27/1982 | 15.40\% | 13.89\% | 1.51\% |
| 3/30/1982 | 15.50\% | 13.90\% | 1.60\% |
| 3/31/1982 | 17.00\% | 13.90\% | 3.10\% |
| 4/1/1982 | 14.70\% | 13.91\% | 0.79\% |
| 4/1/1982 | 16.50\% | 13.91\% | 2.59\% |
| 4/2/1982 | 15.50\% | 13.91\% | 1.59\% |
| 4/5/1982 | 15.50\% | 13.91\% | 1.59\% |
| 4/8/1982 | 16.40\% | 13.93\% | 2.47\% |
| 4/13/1982 | 14.50\% | 13.93\% | 0.57\% |
| 4/23/1982 | 15.75\% | 13.94\% | 1.81\% |
| 4/27/1982 | 15.00\% | 13.94\% | 1.06\% |
| 4/28/1982 | 15.75\% | 13.94\% | 1.81\% |
| 4/30/1982 | 14.70\% | 13.94\% | 0.76\% |
| 4/30/1982 | 15.50\% | 13.94\% | 1.56\% |
| 5/3/1982 | 16.60\% | 13.94\% | 2.66\% |
| 5/4/1982 | 16.00\% | 13.94\% | 2.06\% |
| 5/14/1982 | 15.50\% | 13.92\% | 1.58\% |
| 5/18/1982 | 15.42\% | 13.92\% | 1.50\% |
| 5/19/1982 | 14.69\% | 13.91\% | 0.78\% |
| 5/20/1982 | 15.00\% | 13.91\% | 1.09\% |
| 5/20/1982 | 15.10\% | 13.91\% | 1.19\% |
| 5/20/1982 | 15.50\% | 13.91\% | 1.59\% |
| 5/20/1982 | 16.30\% | 13.91\% | 2.39\% |
| 5/21/1982 | 17.75\% | 13.91\% | 3.84\% |
| 5/27/1982 | 15.00\% | 13.89\% | 1.11\% |
| 5/28/1982 | 15.50\% | 13.89\% | 1.61\% |
| 5/28/1982 | 17.00\% | 13.89\% | 3.11\% |
| 6/1/1982 | 13.75\% | 13.89\% | -0.14\% |
| 6/1/1982 | 16.60\% | 13.89\% | 2.71\% |
| 6/9/1982 | 17.86\% | 13.88\% | 3.98\% |
| 6/14/1982 | 15.75\% | 13.88\% | 1.87\% |
| 6/15/1982 | 14.85\% | 13.88\% | 0.97\% |
| 6/18/1982 | 15.50\% | 13.87\% | 1.63\% |
| 6/21/1982 | 14.90\% | 13.87\% | 1.03\% |
| 6/23/1982 | 16.00\% | 13.87\% | 2.13\% |
| 6/23/1982 | 16.17\% | 13.87\% | 2.30\% |
| 6/24/1982 | 14.85\% | 13.86\% | 0.99\% |
| 6/25/1982 | 14.70\% | 13.86\% | 0.84\% |
| 7/1/1982 | 16.00\% | 13.85\% | 2.15\% |
| 7/2/1982 | 15.62\% | 13.84\% | 1.78\% |
| 7/2/1982 | 17.00\% | 13.84\% | 3.16\% |
| 7/13/1982 | 14.00\% | 13.82\% | 0.18\% |
| 7/13/1982 | 16.80\% | 13.82\% | 2.98\% |
| 7/14/1982 | 15.76\% | 13.82\% | 1.94\% |
| 7/14/1982 | 16.02\% | 13.82\% | 2.20\% |
| 7/19/1982 | 16.50\% | 13.80\% | 2.70\% |
| 7/22/1982 | 14.50\% | 13.78\% | 0.72\% |
| 7/22/1982 | 17.00\% | 13.78\% | 3.22\% |
| 7127/1982 | 16.75\% | 13.75\% | 3.00\% |
| 7129/1982 | 16.50\% | 13.74\% | 2.76\% |
| 8/11/1982 | 17.50\% | 13.69\% | 3.81\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 8/18/1982 | 17.07\% | 13.64\% | 3.43\% |
| 8/20/1982 | 15.73\% | 13.61\% | 2.12\% |
| 8/25/1982 | 16.00\% | 13.57\% | 2.43\% |
| 8/26/1982 | 15.50\% | 13.56\% | 1.94\% |
| 8/30/1982 | 15.00\% | 13.55\% | 1.45\% |
| 9/3/1982 | 16.20\% | 13.53\% | 2.67\% |
| 9/8/1982 | 15.00\% | 13.52\% | 1.48\% |
| 9/15/1982 | 13.08\% | 13.50\% | -0.42\% |
| 9/15/1982 | 16.25\% | 13.50\% | 2.75\% |
| 9/16/1982 | 16.00\% | 13.50\% | 2.50\% |
| 9/17/1982 | 15.25\% | 13.49\% | 1.76\% |
| 9/23/1982 | 17.17\% | 13.47\% | 3.70\% |
| 9/24/1982 | 14.50\% | 13.46\% | 1.04\% |
| 9/27/1982 | 15.25\% | 13.46\% | 1.79\% |
| 10/1/1982 | 15.50\% | 13.42\% | 2.08\% |
| 10/15/1982 | 15.90\% | 13.32\% | 2.58\% |
| 10/22/1982 | 15.75\% | 13.25\% | 2.50\% |
| 10/22/1982 | 17.15\% | 13.25\% | 3.90\% |
| 10/29/1982 | 15.54\% | 13.17\% | 2.37\% |
| 11/1/1982 | 15.50\% | 13.15\% | 2.35\% |
| 11/3/1982 | 17.20\% | 13.13\% | 4.07\% |
| 11/4/1982 | 16.25\% | 13.12\% | 3.13\% |
| 11/5/1982 | 16.20\% | 13.10\% | 3.10\% |
| 11/9/1982 | 16.00\% | 13.06\% | 2.94\% |
| 11/23/1982 | 15.50\% | 12.89\% | 2.61\% |
| 11/23/1982 | 15.85\% | 12.89\% | 2.96\% |
| 11/30/1982 | 16.50\% | 12.82\% | 3.68\% |
| 12/1/1982 | 17.04\% | 12.79\% | 4.25\% |
| 12/6/1982 | 15.00\% | 12.74\% | 2.26\% |
| 12/6/1982 | 16.35\% | 12.74\% | 3.61\% |
| 12/10/1982 | 15.50\% | 12.67\% | 2.83\% |
| 12/13/1982 | 16.00\% | 12.65\% | 3.35\% |
| 12/14/1982 | 15.30\% | 12.63\% | 2.67\% |
| 12/14/1982 | 16.40\% | 12.63\% | 3.77\% |
| 12/20/1982 | 16.00\% | 12.58\% | 3.42\% |
| 12/21/1982 | 14.75\% | 12.56\% | 2.19\% |
| 12/21/1982 | 15.85\% | 12.56\% | 3.29\% |
| 12/22/1982 | 16.25\% | 12.55\% | 3.70\% |
| 12/22/1982 | 16.58\% | 12.55\% | 4.03\% |
| 12/22/1982 | 16.75\% | 12.55\% | 4.20\% |
| 12/29/1982 | 14.90\% | 12.49\% | 2.41\% |
| 12/29/1982 | 16.25\% | 12.49\% | 3.76\% |
| 12/30/1982 | 16.00\% | 12.47\% | 3.53\% |
| 12/30/1982 | 16.35\% | 12.47\% | 3.88\% |
| 12/30/1982 | 16.77\% | 12.47\% | 4.30\% |
| 1/5/1983 | 17.33\% | 12.41\% | 4.92\% |
| 1/11/1983 | 15.90\% | 12.35\% | 3.55\% |
| 1/12/1983 | 14.63\% | 12.34\% | 2.29\% |
| 1/12/1983 | 15.50\% | 12.34\% | 3.16\% |
| 1/20/1983 | 17.75\% | 12.24\% | 5.51\% |
| 1/21/1983 | 15.00\% | 12.23\% | 2.77\% |

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[6] [7]
[7]

Date of Electric Rate Case 1/24/1983 1/24/1983 1/25/1983 1/27/1983 2/1/1983 2/4/1983 2/10/1983 2/21/1983 2/22/1983 2/23/1983 2/23/1983 3/2/1983 3/9/1983 3/15/1983 3/18/1983
3/23/1983 3/24/1983 3/29/1983 3/30/1983 3/31/1983 4/4/1983 4/8/1983 4/11/1983 4/19/1983 4/20/1983 4/29/1983 5/1/1983 5/9/1983 5/11/1983 5/12/1983 5/18/1983 5/23/1983 5/23/1983 5/25/1983 5/27/1983 5/31/1983 5/31/1983 6/2/1983 6/17/1983 7/1/1983 7/1/1983 718/1983 7/13/1983 7/19/1983 7/19/1983 7/25/1983 7/28/1983 8/3/1983 8/3/1983 8/19/1983 8/22/1983

Return on Equity 14.50 16.71\% 14.81\%
16.46\% 14.90\% 14.00\%
15.50\%
14.80\%
15.10\%
16.50\%
15.00\% 15.50\%
[8]
[9]
Average 30Year Treasury

Risk 14.50\% Yield Yield 2.21\% Premium 15.50\% 15.85\% 16.14\% 18.50\% 14.00\% 15.00\% 15.50\% 15.50\% 15.10\% 16.00\%
15.25\%
15.20\% 13.00\% 15.25\% 15.40\% 15.00\% 15.50\% 15.00\% 15.20\% 15.50\%
14.50\%
16.00\%
16.00\%
14.50\%
15.50\%
14.14\% $15.00 \%$
15.50\%
15.50\% 15.00\%
14.50\%
15.03\%
14.90\%
16.25\%
13.20\%
15.00\%
16.25\%
15.90\%
16.34\%
12.21\%
2.29\%
12.20\% $3.29 \%$

12.17\% | $3.65 \%$ |
| :--- |

12.14\% 6.36\%
$12.10 \% \quad 1.90 \%$
12.06\% 2.94\%

| $11.99 \%$ | $3.51 \%$ |
| :--- | :--- |
| $11.98 \%$ | $3.52 \%$ |

11.96\%
3.14\%
$11.96 \% \quad 4.04 \%$
$11.90 \% \quad 3.35 \%$
11.83\% 3.37\%
$11.78 \% \quad 1.22 \%$
11.74\% 3.51\%
11.70\% 3.70\%

| $11.68 \%$ | $3.32 \%$ |
| :--- | :--- |
| $11.64 \%$ | $3.86 \%$ |

11.6
 5.09\%
11.61\% 3.39\%
11.59\% 3.61\%
11.52\% 3.98\%
11.50\% 3.31\%
11.39\% $3.11 \%$
$11.37 \% \quad 4.63 \%$
11.26\% 4.74\%
11.26\% 3.24\%
11.16\%
4.34\%
11.13\% 5.33\%
$\begin{array}{ll}11.12 \% & 3.02 \% \\ 11.06 \% & 3.94 \%\end{array}$
$\begin{array}{ll}11.06 \% & 3.94 \% \\ 11.02 \% & 3.88 \%\end{array}$
11.02\% $4.48 \%$
$11.00 \% \quad 4.50 \%$
$\begin{array}{ll}10.97 \% & 4.03 \% \\ 10.96 \% & 3.04 \%\end{array}$
10.96\% $\quad 4.54 \%$
10.94\% 3.56\%
10.85\% 4.18\%
10.78\% 4.02\%
10.78\% 4.12\%
10.76\% $\quad 5.49 \%$
$\begin{array}{ll}10.76 \% & 2.44 \% \\ 10.75 \% & 4.25 \%\end{array}$
$\begin{array}{ll}10.75 \% & 4.25 \% \\ 10.75 \% & 4.35 \%\end{array}$
10.7
10.74\% 5.16
10.75\% 5.59\%
10.75\% 5.75\%
10.8
4.20\%
$10.80 \%$ 4.70\%

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 8/22/1983 | 16.40\% | 10.80\% | 5.60\% |
| 8/31/1983 | 14.75\% | 10.84\% | 3.91\% |
| 9/7/1983 | 15.00\% | 10.86\% | 4.14\% |
| 9/14/1983 | 15.78\% | 10.89\% | 4.89\% |
| 9/16/1983 | 15.00\% | 10.90\% | 4.10\% |
| 9/19/1983 | 14.50\% | 10.91\% | 3.59\% |
| 9/20/1983 | 16.50\% | 10.91\% | 5.59\% |
| 9/28/1983 | 14.50\% | 10.94\% | 3.56\% |
| 9/29/1983 | 15.50\% | 10.94\% | 4.56\% |
| 9/30/1983 | 15.25\% | 10.95\% | 4.30\% |
| 9/30/1983 | 16.15\% | 10.95\% | 5.20\% |
| 1014/1983 | 14.80\% | 10.96\% | 3.84\% |
| 10/711983 | 16.00\% | 10.97\% | 5.03\% |
| 10/13/1983 | 15.52\% | 10.98\% | 4.54\% |
| 10/17/1983 | 15.50\% | 10.99\% | 4.51\% |
| 10/18/1983 | 14.50\% | 11.00\% | 3.50\% |
| 10/19/1983 | 16.25\% | 11.00\% | 5.25\% |
| 10/19/1983 | 16.50\% | 11.00\% | 5.50\% |
| 10/26/1983 | 15.00\% | 11.03\% | 3.97\% |
| 10/27/1983 | 15.20\% | 11.04\% | 4.16\% |
| 11/1/1983 | 16.00\% | 11.06\% | 4.94\% |
| 11/9/1983 | 14.90\% | 11.09\% | 3.81\% |
| 11/10/1983 | 14.35\% | 11.10\% | 3.25\% |
| 11/23/1983 | 16.00\% | 11.13\% | 4.87\% |
| 11/23/1983 | 16.15\% | 11.13\% | 5.02\% |
| 11/30/1983 | 15.00\% | 11.14\% | 3.86\% |
| 12/5/1983 | 15.25\% | 11.15\% | 4.10\% |
| 12/6/1983 | 15.07\% | 11.15\% | 3.92\% |
| 12/8/1983 | 15.90\% | 11.16\% | 4.74\% |
| 1219/1983 | 14.75\% | 11.17\% | 3.58\% |
| 12/12/1983 | 14.50\% | 11.17\% | 3.33\% |
| 12/15/1983 | 15.56\% | 11.19\% | 4.37\% |
| 12/19/1983 | 14.80\% | 11.21\% | 3.59\% |
| 12/20/1983 | 14.69\% | 11.21\% | 3.48\% |
| 12/20/1983 | 16.00\% | 11.21\% | 4.79\% |
| 12/20/1983 | 16.25\% | 11.21\% | 5.04\% |
| 12/22/1983 | 14.75\% | 11.23\% | 3.52\% |
| 12/22/1983 | 15.75\% | 11.23\% | 4.52\% |
| 1/3/1984 | 14.75\% | 11.26\% | 3.49\% |
| 1/10/1984 | 15.90\% | 11.29\% | 4.61\% |
| 1/12/1984 | 15.60\% | 11.30\% | 4.30\% |
| 1/18/1984 | 13.75\% | 11.32\% | 2.43\% |
| 1/19/1984 | 15.90\% | 11.33\% | 4.57\% |
| 1/30/1984 | 16.10\% | 11.36\% | 4.74\% |
| 1/31/1984 | 15.25\% | 11.37\% | 3.88\% |
| 211/1984 | 14.80\% | 11.38\% | 3.42\% |
| 216/1984 | 13.75\% | 11.40\% | 2.35\% |
| 216/1984 | 14.75\% | 11.40\% | 3.35\% |
| 219/1984 | 15.25\% | 11.42\% | 3.83\% |
| 2/15/1984 | 15.70\% | 11.44\% | 4.26\% |
| 2/20/1984 | 15.00\% | 11.45\% | 3.55\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 2/20/1984 | 15.00\% | 11.45\% | 3.55\% |
| 2/22/1984 | 14.75\% | 11.47\% | 3.28\% |
| 2/28/1984 | 14.50\% | 11.50\% | 3.00\% |
| 3/2/1984 | 14.25\% | 11.53\% | 2.72\% |
| 3/20/1984 | 16.00\% | 11.64\% | 4.36\% |
| 3/23/1984 | 15.50\% | 11.66\% | 3.84\% |
| 3/26/1984 | 14.71\% | 11.67\% | 3.04\% |
| 4/2/1984 | 15.50\% | 11.71\% | 3.79\% |
| 4/6/1984 | 14.74\% | 11.75\% | 2.99\% |
| 4/11/1984 | 15.72\% | 11.77\% | 3.95\% |
| 4/17/1984 | 15.00\% | 11.80\% | 3.20\% |
| 4/18/1984 | 16.20\% | 11.81\% | 4.39\% |
| 4/25/1984 | 14.64\% | 11.85\% | 2.79\% |
| 4/30/1984 | 14.40\% | 11.87\% | 2.53\% |
| 5/16/1984 | 14.69\% | 11.98\% | 2.71\% |
| 5/16/1984 | 15.00\% | 11.98\% | 3.02\% |
| 5/22/1984 | 14.40\% | 12.02\% | 2.38\% |
| 5/29/1984 | 15.10\% | 12.06\% | 3.04\% |
| 6/13/1984 | 15.25\% | 12.15\% | 3.10\% |
| 6/15/1984 | 15.60\% | 12.17\% | 3.43\% |
| 6/22/1984 | 16.25\% | 12.21\% | 4.04\% |
| 6/29/1984 | 15.25\% | 12.25\% | 3.00\% |
| 7/2/1984 | 13.35\% | 12.26\% | 1.09\% |
| 7/10/1984 | 16.00\% | 12.31\% | 3.69\% |
| 7/12/1984 | 16.50\% | 12.32\% | 4.18\% |
| 7/13/1984 | 16.25\% | 12.33\% | 3.92\% |
| 7/17/1984 | 14.14\% | 12.35\% | 1.79\% |
| 7118/1984 | 15.30\% | 12.35\% | 2.95\% |
| 7/18/1984 | 15.50\% | 12.35\% | 3.15\% |
| 7/19/1984 | 14.30\% | 12.36\% | 1.94\% |
| 7/24/1984 | 16.79\% | 12.39\% | 4.40\% |
| 7/31/1984 | 16.00\% | 12.42\% | 3.58\% |
| 8/3/1984 | 14.25\% | 12.44\% | 1.81\% |
| 8/17/1984 | 14.30\% | 12.48\% | 1.82\% |
| 8/20/1984 | 15.00\% | 12.49\% | 2.51\% |
| 8/27/1984 | 16.30\% | 12.50\% | 3.80\% |
| 8/31/1984 | 15.55\% | 12.52\% | 3.03\% |
| 9/6/1984 | 16.00\% | 12.53\% | 3.47\% |
| 9/10/1984 | 14.75\% | 12.54\% | 2.21\% |
| 9/13/1984 | 15.00\% | 12.55\% | 2.45\% |
| 9/17/1984 | 17.38\% | 12.55\% | 4.83\% |
| 9/26/1984 | 14.50\% | 12.57\% | 1.93\% |
| 9/28/1984 | 15.00\% | 12.57\% | 2.43\% |
| 9/28/1984 | 16.25\% | 12.57\% | 3.68\% |
| 10/9/1984 | 14.75\% | 12.58\% | 2.17\% |
| 10/12/1984 | 15.60\% | 12.58\% | 3.02\% |
| 10/22/1984 | 15.00\% | 12.58\% | 2.42\% |
| 10/26/1984 | 16.40\% | 12.58\% | 3.82\% |
| 10/31/1984 | 16.25\% | 12.58\% | 3.67\% |
| 11/7/1984 | 15.60\% | 12.58\% | 3.02\% |
| 11/9/1984 | 16.00\% | 12.58\% | 3.42\% |


| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 11/14/1984 | 15.75\% | 12.58\% | 3.17\% |
| 11/20/1984 | 15.25\% | 12.57\% | 2.68\% |
| 11/20/1984 | 15.92\% | 12.57\% | 3.35\% |
| 11/23/1984 | 15.00\% | 12.57\% | 2.43\% |
| 11/28/1984 | 16.15\% | 12.56\% | 3.59\% |
| 12/3/1984 | 15.80\% | 12.56\% | 3.24\% |
| 12/4/1984 | 16.50\% | 12.56\% | 3.94\% |
| 12/18/1984 | 16.40\% | 12.53\% | 3.87\% |
| 12/19/1984 | 14.75\% | 12.53\% | 2.22\% |
| 12/19/1984 | 15.00\% | 12.53\% | 2.47\% |
| 12/20/1984 | 16.00\% | 12.52\% | 3.48\% |
| 12/28/1984 | 16.00\% | 12.50\% | 3.50\% |
| 1/3/1985 | 14.75\% | 12.49\% | 2.26\% |
| 1/10/1985 | 15.75\% | 12.47\% | 3.28\% |
| 1/11/1985 | 16.30\% | 12.46\% | 3.84\% |
| 1/23/1985 | 15.80\% | 12.43\% | 3.37\% |
| 1/24/1985 | 15.82\% | 12.43\% | 3.39\% |
| 1/25/1985 | 16.75\% | 12.42\% | 4.33\% |
| 1/30/1985 | 14.90\% | 12.40\% | 2.50\% |
| 1/31/1985 | 14.75\% | 12.39\% | 2.36\% |
| 218/1985 | 14.47\% | 12.36\% | 2.11\% |
| 3/1/1985 | 13.84\% | 12.31\% | 1.53\% |
| 3/8/1985 | 16.85\% | 12.29\% | 4.56\% |
| 3/14/1985 | 15.50\% | 12.26\% | 3.24\% |
| 3/15/1985 | 15.62\% | 12.26\% | 3.36\% |
| 3/29/1985 | 15.62\% | 12.17\% | 3.45\% |
| 4/3/1985 | 14.60\% | 12.14\% | 2.46\% |
| 4/9/1985 | 15.50\% | 12.11\% | 3.39\% |
| 4/16/1985 | 15.70\% | 12.06\% | 3.64\% |
| 4/22/1985 | 14.00\% | 12.02\% | 1.98\% |
| 4/26/1985 | 15.50\% | 11.99\% | 3.51\% |
| 4/29/1985 | 15.00\% | 11.98\% | 3.02\% |
| 5/2/1985 | 14.68\% | 11.94\% | 2.74\% |
| 5/8/1985 | 15.62\% | 11.90\% | 3.72\% |
| 5/10/1985 | 16.50\% | 11.88\% | 4.62\% |
| 5/29/1985 | 14.61\% | 11.74\% | 2.87\% |
| 5/31/1985 | 16.00\% | 11.72\% | 4.28\% |
| 6/14/1985 | 15.50\% | 11.61\% | 3.89\% |
| 719/1985 | 15.00\% | 11.45\% | 3.55\% |
| 7/16/1985 | 14.50\% | 11.40\% | 3.10\% |
| 7/26/1985 | 14.50\% | 11.33\% | 3.17\% |
| 8/2/1985 | 14.80\% | 11.29\% | 3.51\% |
| 8/7/1985 | 15.00\% | 11.27\% | 3.73\% |
| 8/28/1985 | 14.25\% | 11.15\% | 3.10\% |
| 8/28/1985 | 15.50\% | 11.15\% | 4.35\% |
| 8/29/1985 | 14.50\% | 11.15\% | 3.35\% |
| 9/9/1985 | 14.60\% | 11.11\% | 3.49\% |
| 9/9/1985 | 14.90\% | 11.11\% | 3.79\% |
| 9/17/1985 | 14.90\% | 11.09\% | 3.81\% |
| 9/23/1985 | 15.00\% | 11.07\% | 3.93\% |
| 9/27/1985 | 15.50\% | 11.05\% | 4.45\% |


| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 9/2711985 | 15.80\% | 11.05\% | 4.75\% |
| 10/2/1985 | 14.00\% | 11.04\% | 2.96\% |
| 10/2/1985 | 14.75\% | 11.04\% | 3.71\% |
| 10/3/1985 | 15.25\% | 11.03\% | 4.22\% |
| 10/24/1985 | 15.40\% | 10.96\% | 4.44\% |
| 10/24/1985 | 15.82\% | 10.96\% | 4.86\% |
| 10/24/1985 | 15.85\% | 10.96\% | 4.89\% |
| 10/28/1985 | 16.00\% | 10.95\% | 5.05\% |
| 10/29/1985 | 16.65\% | 10.95\% | 5.70\% |
| 10/31/1985 | 15.06\% | 10.93\% | 4.13\% |
| 11/4/1985 | 14.50\% | 10.92\% | 3.58\% |
| 11/7/1985 | 15.50\% | 10.90\% | 4.60\% |
| 11/8/1985 | 14.30\% | 10.89\% | 3.41\% |
| 12/12/1985 | 14.75\% | 10.73\% | 4.02\% |
| 12/18/1985 | 15.00\% | 10.70\% | 4.30\% |
| 12/20/1985 | 14.50\% | 10.68\% | 3.82\% |
| 12/20/1985 | 14.50\% | 10.68\% | 3.82\% |
| 12/20/1985 | 15.00\% | 10.68\% | 4.32\% |
| 1/24/1986 | 15.40\% | 10.41\% | 4.99\% |
| 1/31/1986 | 15.00\% | 10.36\% | 4.64\% |
| 215/1986 | 15.00\% | 10.33\% | 4.67\% |
| 215/1986 | 15.75\% | 10.33\% | 5.42\% |
| 2/10/1986 | 13.30\% | 10.30\% | 3.00\% |
| 2/11/1986 | 12.50\% | 10.28\% | 2.22\% |
| 2/14/1986 | 14.40\% | 10.25\% | 4.15\% |
| 2/18/1986 | 16.00\% | 10.24\% | 5.76\% |
| 2/24/1986 | 14.50\% | 10.18\% | 4.32\% |
| 2/26/1986 | 14.00\% | 10.16\% | 3.84\% |
| 3/5/1986 | 14.90\% | 10.08\% | 4.82\% |
| 3/11/1986 | 14.50\% | 10.02\% | 4.48\% |
| 3/12/1986 | 13.50\% | 10.01\% | 3.49\% |
| 3/27/1986 | 14.10\% | 9.86\% | 4.24\% |
| 3/31/1986 | 13.50\% | 9.84\% | 3.66\% |
| 4/1/1986 | 14.00\% | 9.83\% | 4.17\% |
| 4/2/1986 | 15.50\% | 9.81\% | 5.69\% |
| 4/4/1986 | 15.00\% | 9.78\% | 5.22\% |
| 4/14/1986 | 13.40\% | 9.69\% | 3.71\% |
| 4/23/1986 | 15.00\% | 9.58\% | 5.42\% |
| 5/16/1986 | 14.50\% | 9.33\% | 5.17\% |
| 5/16/1986 | 14.50\% | 9.33\% | 5.17\% |
| 5/29/1986 | 13.90\% | 9.20\% | 4.70\% |
| 5/30/1986 | 15.10\% | 9.19\% | 5.91\% |
| 6/2/1986 | 12.81\% | 9.17\% | 3.64\% |
| 6/11/1986 | 14.00\% | 9.08\% | 4.92\% |
| 6/24/1986 | 16.63\% | 8.94\% | 7.69\% |
| 6/26/1986 | 12.00\% | 8.91\% | 3.09\% |
| 6/26/1986 | 14.75\% | 8.91\% | 5.84\% |
| 6/30/1986 | 13.00\% | 8.88\% | 4.12\% |
| 7/10/1986 | 14.34\% | 8.76\% | 5.58\% |
| 7/11/1986 | 12.75\% | 8.74\% | 4.01\% |
| 7/14/1986 | 12.60\% | 8.72\% | 3.88\% |


| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 711711986 | 12.40\% | 8.67\% | 3.73\% |
| 7/25/1986 | 14.25\% | 8.58\% | 5.67\% |
| 8/6/1986 | 13.50\% | 8.45\% | 5.05\% |
| 8/14/1986 | 13.50\% | 8.36\% | 5.14\% |
| 9/16/1986 | 12.75\% | 8.07\% | 4.68\% |
| 9/19/1986 | 13.25\% | 8.04\% | 5.21\% |
| 10/1/1986 | 14.00\% | 7.96\% | 6.04\% |
| 10/3/1986 | 13.40\% | 7.94\% | 5.46\% |
| 10/31/1986 | 13.50\% | 7.78\% | 5.72\% |
| 11/5/1986 | 13.00\% | 7.76\% | 5.24\% |
| 12/3/1986 | 12.90\% | 7.59\% | 5.31\% |
| 12/4/1986 | 14.44\% | 7.58\% | 6.86\% |
| 12/16/1986 | 13.60\% | 7.53\% | 6.07\% |
| 12/22/1986 | 13.80\% | 7.51\% | 6.29\% |
| 12/30/1986 | 13.00\% | 7.49\% | 5.51\% |
| 1/2/1987 | 13.00\% | 7.49\% | 5.51\% |
| 1/12/1987 | 12.40\% | 7.47\% | 4.93\% |
| 1/27/1987 | 12.71\% | 7.46\% | 5.25\% |
| 3/2/1987 | 12.47\% | 7.47\% | 5.00\% |
| 3/3/1987 | 13.60\% | 7.47\% | 6.13\% |
| 3/4/1987 | 12.38\% | 7.47\% | 4.91\% |
| 3/10/1987 | 13.50\% | 7.47\% | 6.03\% |
| 3/13/1987 | 13.00\% | 7.47\% | 5.53\% |
| 3/31/1987 | 13.00\% | 7.47\% | 5.53\% |
| 4/6/1987 | 13.00\% | 7.47\% | 5.53\% |
| 4/14/1987 | 12.50\% | 7.49\% | 5.01\% |
| 4/16/1987 | 14.50\% | 7.50\% | 7.00\% |
| 4/27/1987 | 12.00\% | 7.54\% | 4.46\% |
| 5/5/1987 | 12.85\% | 7.58\% | 5.27\% |
| 5/12/1987 | 12.65\% | 7.62\% | 5.03\% |
| 5/28/1987 | 13.50\% | 7.70\% | 5.80\% |
| 6/15/1987 | 13.20\% | 7.78\% | 5.42\% |
| 6/29/1987 | 15.00\% | 7.83\% | 7.17\% |
| 6/30/1987 | 12.50\% | 7.84\% | 4.66\% |
| 718/1987 | 12.00\% | 7.86\% | 4.14\% |
| 7/10/1987 | 12.90\% | 7.86\% | 5.04\% |
| 7/15/1987 | 13.50\% | 7.88\% | 5.62\% |
| 7116/1987 | 13.50\% | 7.88\% | 5.62\% |
| 7/16/1987 | 15.00\% | 7.88\% | 7.12\% |
| 7/2711987 | 13.00\% | 7.92\% | 5.08\% |
| $7127 / 1987$ | 13.40\% | 7.92\% | 5.48\% |
| $7 / 27 / 1987$ | 13.50\% | 7.92\% | 5.58\% |
| 7/31/1987 | 12.98\% | 7.94\% | 5.04\% |
| 8/26/1987 | 12.63\% | 8.05\% | 4.58\% |
| 8/26/1987 | 12.75\% | 8.05\% | 4.70\% |
| 8/2711987 | 13.25\% | 8.06\% | 5.19\% |
| 9/9/1987 | 13.00\% | 8.13\% | 4.87\% |
| 9/30/1987 | 12.75\% | 8.30\% | 4.45\% |
| 9/30/1987 | 13.00\% | 8.30\% | 4.70\% |
| 10/2/1987 | 11.50\% | 8.33\% | 3.17\% |
| 10/15/1987 | 13.00\% | 8.43\% | 4.57\% |


| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 11/2/1987 | 13.00\% | 8.54\% | 4.46\% |
| 11/19/1987 | 13.00\% | 8.63\% | 4.37\% |
| 11/30/1987 | 12.00\% | 8.68\% | 3.32\% |
| 12/3/1987 | 14.20\% | 8.70\% | 5.50\% |
| 12/15/1987 | 13.25\% | 8.77\% | 4.48\% |
| 12/16/1987 | 13.50\% | 8.78\% | 4.72\% |
| 12/16/1987 | 13.72\% | 8.78\% | 4.94\% |
| 12/17/1987 | 11.75\% | 8.78\% | 2.97\% |
| 12/18/1987 | 13.50\% | 8.79\% | 4.71\% |
| 12/21/1987 | 12.01\% | 8.80\% | 3.21\% |
| 12/22/1987 | 12.00\% | 8.81\% | 3.19\% |
| 12/22/1987 | 12.00\% | 8.81\% | 3.19\% |
| 12/22/1987 | 12.75\% | 8.81\% | 3.94\% |
| 12/22/1987 | 13.00\% | 8.81\% | 4.19\% |
| 1/20/1988 | 13.80\% | 8.93\% | 4.87\% |
| 1/26/1988 | 13.90\% | 8.95\% | 4.95\% |
| 1/29/1988 | 13.20\% | 8.95\% | 4.25\% |
| 2/4/1988 | 12.60\% | 8.96\% | 3.64\% |
| 3/1/1988 | 11.56\% | 8.94\% | 2.62\% |
| 3/23/1988 | 12.87\% | 8.92\% | 3.95\% |
| 3/24/1988 | 11.24\% | 8.92\% | 2.32\% |
| 3/30/1988 | 12.72\% | 8.92\% | 3.80\% |
| 4/1/1988 | 12.50\% | 8.92\% | 3.58\% |
| 4/7/1988 | 13.25\% | 8.93\% | 4.32\% |
| 4/25/1988 | 10.96\% | 8.95\% | 2.01\% |
| 5/3/1988 | 12.91\% | 8.97\% | 3.94\% |
| 5/11/1988 | 13.50\% | 8.99\% | 4.51\% |
| 5/16/1988 | 13.00\% | 8.99\% | 4.01\% |
| 6/30/1988 | 12.75\% | 9.00\% | 3.75\% |
| 7/1/1988 | 12.75\% | 9.00\% | 3.75\% |
| 7/20/1988 | 13.40\% | 8.97\% | 4.43\% |
| 8/5/1988 | 12.75\% | 8.92\% | 3.83\% |
| 8/23/1988 | 11.70\% | 8.93\% | 2.77\% |
| 8/29/1988 | 12.75\% | 8.94\% | 3.81\% |
| 8/30/1988 | 13.50\% | 8.94\% | 4.56\% |
| 9/8/1988 | 12.60\% | 8.95\% | 3.65\% |
| 10/13/1988 | 13.10\% | 8.93\% | 4.17\% |
| 12/19/1988 | 13.00\% | 9.01\% | 3.99\% |
| 12/20/1988 | 12.25\% | 9.02\% | 3.23\% |
| 12/20/1988 | 13.00\% | 9.02\% | 3.98\% |
| 12/21/1988 | 12.90\% | 9.02\% | 3.88\% |
| 12/27/1988 | 13.00\% | 9.03\% | 3.97\% |
| 12/28/1988 | 13.10\% | 9.03\% | 4.07\% |
| 12/30/1988 | 13.40\% | 9.03\% | 4.37\% |
| 1/27/1989 | 13.00\% | 9.05\% | 3.95\% |
| 1/31/1989 | 13.00\% | 9.05\% | 3.95\% |
| 2/17/1989 | 13.00\% | 9.05\% | 3.95\% |
| 2/20/1989 | 12.40\% | 9.05\% | 3.35\% |
| 3/1/1989 | 12.76\% | 9.05\% | 3.71\% |
| 3/8/1989 | 13.00\% | 9.05\% | 3.95\% |
| 3/30/1989 | 14.00\% | 9.05\% | 4.95\% |


| [6] <br> Date of <br> Electric Rate Case | [] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 4/5/1989 | 14.20\% | 9.05\% | 5.15\% |
| 4/18/1989 | 13.00\% | 9.05\% | 3.95\% |
| 5/5/1989 | 12.40\% | 9.05\% | 3.35\% |
| 6/2/1989 | 13.20\% | 9.01\% | 4.19\% |
| 6/8/1989 | 13.50\% | 8.98\% | 4.52\% |
| 6/2711989 | 13.25\% | 8.92\% | 4.33\% |
| 6/30/1989 | 13.00\% | 8.90\% | 4.10\% |
| 8/14/1989 | 12.50\% | 8.77\% | 3.73\% |
| 9/28/1989 | 12.25\% | 8.63\% | 3.62\% |
| 10/24/1989 | 12.50\% | 8.54\% | 3.96\% |
| 11/9/1989 | 13.00\% | 8.49\% | 4.51\% |
| 12/15/1989 | 13.00\% | 8.34\% | 4.66\% |
| 12/20/1989 | 12.90\% | 8.32\% | 4.58\% |
| 12/21/1989 | 12.90\% | 8.32\% | 4.58\% |
| 12/27/1989 | 12.50\% | 8.30\% | 4.20\% |
| 12/27/1989 | 13.00\% | 8.30\% | 4.70\% |
| 1/10/1990 | 12.80\% | 8.25\% | 4.55\% |
| 1/11/1990 | 12.90\% | 8.24\% | 4.66\% |
| 1/17/1990 | 12.80\% | 8.22\% | 4.58\% |
| 1/26/1990 | 12.00\% | 8.20\% | 3.80\% |
| 2/9/1990 | 12.10\% | 8.18\% | 3.92\% |
| 2/24/1990 | 12.86\% | 8.15\% | 4.71\% |
| 3/30/1990 | 12.90\% | 8.16\% | 4.74\% |
| 4/4/1990 | 15.76\% | 8.17\% | 7.59\% |
| 4/12/1990 | 12.52\% | 8.18\% | 4.34\% |
| 4/19/1990 | 12.75\% | 8.20\% | 4.55\% |
| 5/21/1990 | 12.10\% | 8.28\% | 3.82\% |
| 5/29/1990 | 12.40\% | 8.30\% | 4.10\% |
| 5/31/1990 | 12.00\% | 8.30\% | 3.70\% |
| 6/4/1990 | 12.90\% | 8.30\% | 4.60\% |
| 6/6/1990 | 12.25\% | 8.31\% | 3.94\% |
| 6/15/1990 | 13.20\% | 8.31\% | 4.89\% |
| 6/20/1990 | 12.92\% | 8.32\% | 4.60\% |
| 6/2711990 | 12.90\% | 8.33\% | 4.57\% |
| 6/29/1990 | 12.50\% | 8.33\% | 4.17\% |
| 716/1990 | 12.10\% | 8.34\% | 3.76\% |
| 7/6/1990 | 12.35\% | 8.34\% | 4.01\% |
| 8/10/1990 | 12.55\% | 8.40\% | 4.15\% |
| 8/16/1990 | 13.21\% | 8.42\% | 4.79\% |
| 8/22/1990 | 13.10\% | 8.44\% | 4.66\% |
| 8/24/1990 | 13.00\% | 8.46\% | 4.54\% |
| 9/26/1990 | 11.45\% | 8.59\% | 2.86\% |
| 10/2/1990 | 13.00\% | 8.61\% | 4.39\% |
| 10/5/1990 | 12.84\% | 8.62\% | 4.22\% |
| 10/19/1990 | 13.00\% | 8.66\% | 4.34\% |
| 10/25/1990 | 12.30\% | 8.67\% | 3.63\% |
| 11/21/1990 | 12.70\% | 8.69\% | 4.01\% |
| 12/13/1990 | 12.30\% | 8.67\% | 3.63\% |
| 12/17/1990 | 12.87\% | 8.67\% | 4.20\% |
| 12/18/1990 | 13.10\% | 8.67\% | 4.43\% |
| 12/19/1990 | 12.00\% | 8.66\% | 3.34\% |


| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 12/20/1990 | 12.75\% | 8.66\% | 4.09\% |
| 12/21/1990 | 12.50\% | 8.66\% | 3.84\% |
| 12127/1990 | 12.79\% | 8.66\% | 4.13\% |
| 1/2/1991 | 13.10\% | 8.65\% | 4.45\% |
| 1/4/1991 | 12.50\% | 8.65\% | 3.85\% |
| 1/15/1991 | 12.75\% | 8.64\% | 4.11\% |
| 1/25/1991 | 11.70\% | 8.63\% | 3.07\% |
| 2/4/1991 | 12.50\% | 8.61\% | 3.89\% |
| 27/1991 | 12.50\% | 8.59\% | 3.91\% |
| 2/12/1991 | 13.00\% | 8.58\% | 4.42\% |
| 2/14/1991 | 12.72\% | 8.57\% | 4.15\% |
| 2/22/1991 | 12.80\% | 8.55\% | 4.25\% |
| 3/6/1991 | 13.10\% | 8.53\% | 4.57\% |
| 3/8/1991 | 12.30\% | 8.52\% | 3.78\% |
| 3/8/1991 | 13.00\% | 8.52\% | 4.48\% |
| 4/22/1991 | 13.00\% | 8.49\% | 4.51\% |
| 5/7/1991 | 13.50\% | 8.47\% | 5.03\% |
| 5/13/1991 | 13.25\% | 8.47\% | 4.78\% |
| 5/30/1991 | 12.75\% | 8.44\% | 4.31\% |
| 6/12/1991 | 12.00\% | 8.41\% | 3.59\% |
| 6/25/1991 | 11.70\% | 8.39\% | 3.31\% |
| 6/28/1991 | 12.50\% | 8.38\% | 4.12\% |
| 7/1/1991 | 12.00\% | 8.38\% | 3.62\% |
| 7/3/1991 | 12.50\% | 8.37\% | 4.13\% |
| 7/19/1991 | 12.10\% | 8.34\% | 3.76\% |
| 8/1/1991 | 12.90\% | 8.32\% | 4.58\% |
| 8/16/1991 | 13.20\% | 8.29\% | 4.91\% |
| 9/27/1991 | 12.50\% | 8.23\% | 4.27\% |
| 9/30/1991 | 12.25\% | 8.23\% | 4.02\% |
| 10/17/1991 | 13.00\% | 8.20\% | 4.80\% |
| 10/23/1991 | 12.50\% | 8.20\% | 4.30\% |
| 10/23/1991 | 12.55\% | 8.20\% | 4.35\% |
| 10/31/1991 | 11.80\% | 8.19\% | 3.61\% |
| 11/1/1991 | 12.00\% | 8.19\% | 3.81\% |
| 11/5/1991 | 12.25\% | 8.19\% | 4.06\% |
| 11/12/1991 | 12.50\% | 8.18\% | 4.32\% |
| 11/12/1991 | 13.25\% | 8.18\% | 5.07\% |
| 11/25/1991 | 12.40\% | 8.18\% | 4.22\% |
| 11/26/1991 | 11.60\% | 8.18\% | 3.42\% |
| 11/26/1991 | 12.50\% | 8.18\% | 4.32\% |
| 11/27/1991 | 12.10\% | 8.18\% | 3.92\% |
| 12/18/1991 | 12.25\% | 8.15\% | 4.10\% |
| 12/19/1991 | 12.60\% | 8.15\% | 4.45\% |
| 12/19/1991 | 12.80\% | 8.15\% | 4.65\% |
| 12/20/1991 | 12.65\% | 8.14\% | 4.51\% |
| 1/9/1992 | 12.80\% | 8.09\% | 4.71\% |
| 1/16/1992 | 12.75\% | 8.07\% | 4.68\% |
| 1/21/1992 | 12.00\% | 8.06\% | 3.94\% |
| 1/22/1992 | 13.00\% | 8.06\% | 4.94\% |
| 1/27/1992 | 12.65\% | 8.06\% | 4.59\% |
| 1/31/1992 | 12.00\% | 8.05\% | 3.95\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 2/11/1992 | 12.40\% | 8.03\% | 4.37\% |
| 2/25/1992 | 12.50\% | 8.01\% | 4.49\% |
| 3/16/1992 | 11.43\% | 7.99\% | 3.44\% |
| 3/18/1992 | 12.28\% | 7.98\% | 4.30\% |
| 4/2/1992 | 12.10\% | 7.95\% | 4.15\% |
| 4/9/1992 | 11.45\% | 7.94\% | 3.51\% |
| 4/10/1992 | 11.50\% | 7.94\% | 3.56\% |
| 4/14/1992 | 11.50\% | 7.93\% | 3.57\% |
| 5/5/1992 | 11.50\% | 7.90\% | 3.60\% |
| 5/12/1992 | 11.87\% | 7.89\% | 3.98\% |
| 5/12/1992 | 12.46\% | 7.89\% | 4.57\% |
| 6/1/1992 | 12.30\% | 7.87\% | 4.43\% |
| 6/12/1992 | 10.90\% | 7.86\% | 3.04\% |
| 6/26/1992 | 12.35\% | 7.85\% | 4.50\% |
| 6/29/1992 | 11.00\% | 7.85\% | 3.15\% |
| 6/30/1992 | 13.00\% | 7.85\% | 5.15\% |
| 7/13/1992 | 11.90\% | 7.84\% | 4.06\% |
| 7/13/1992 | 13.50\% | 7.84\% | 5.66\% |
| 7/22/1992 | 11.20\% | 7.83\% | 3.37\% |
| 8/3/1992 | 12.00\% | 7.81\% | 4.19\% |
| 8/6/1992 | 12.50\% | 7.80\% | 4.70\% |
| 9/22/1992 | 12.00\% | 7.71\% | 4.29\% |
| 9/28/1992 | 11.40\% | 7.71\% | 3.69\% |
| 9/30/1992 | 11.75\% | 7.70\% | 4.05\% |
| 10/2/1992 | 13.00\% | 7.70\% | 5.30\% |
| 10/12/1992 | 12.20\% | 7.70\% | 4.50\% |
| 10/16/1992 | 13.16\% | 7.70\% | 5.46\% |
| 10/30/1992 | 11.75\% | 7.71\% | 4.04\% |
| 11/3/1992 | 12.00\% | 7.71\% | 4.29\% |
| 12/3/1992 | 11.85\% | 7.68\% | 4.17\% |
| 12/15/1992 | 11.00\% | 7.66\% | 3.34\% |
| 12/16/1992 | 11.90\% | 7.66\% | 4.24\% |
| 12/16/1992 | 12.40\% | 7.66\% | 4.74\% |
| 12117/1992 | 12.00\% | 7.66\% | 4.34\% |
| 12/22/1992 | 12.30\% | 7.65\% | 4.65\% |
| 12/22/1992 | 12.40\% | 7.65\% | 4.75\% |
| 12/29/1992 | 12.25\% | 7.63\% | 4.62\% |
| 12/30/1992 | 12.00\% | 7.63\% | 4.37\% |
| 12/31/1992 | 11.90\% | 7.63\% | 4.27\% |
| 1/12/1993 | 12.00\% | 7.61\% | 4.39\% |
| 1/21/1993 | 11.25\% | 7.59\% | 3.66\% |
| 2/2/1993 | 11.40\% | 7.56\% | 3.84\% |
| 2/15/1993 | 12.30\% | 7.52\% | 4.78\% |
| 2/24/1993 | 11.90\% | 7.49\% | 4.41\% |
| 2/26/1993 | 11.80\% | 7.48\% | 4.32\% |
| 2/26/1993 | 12.20\% | 7.48\% | 4.72\% |
| 4/23/1993 | 11.75\% | 7.29\% | 4.46\% |
| 5/11/1993 | 11.75\% | 7.25\% | 4.50\% |
| 5/14/1993 | 11.50\% | 7.24\% | 4.26\% |
| 5/25/1993 | 11.50\% | 7.23\% | 4.27\% |
| 5/28/1993 | 11.00\% | 7.22\% | 3.78\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 6/3/1993 | 12.00\% | 7.21\% | 4.79\% |
| 6/16/1993 | 11.50\% | 7.19\% | 4.31\% |
| 6/18/1993 | 12.10\% | 7.18\% | 4.92\% |
| 6/25/1993 | 11.67\% | 7.17\% | 4.50\% |
| 7/21/1993 | 11.38\% | 7.10\% | 4.28\% |
| 7/23/1993 | 10.46\% | 7.09\% | 3.37\% |
| 8/24/1993 | 11.50\% | 6.96\% | 4.54\% |
| 9/21/1993 | 10.50\% | 6.81\% | 3.69\% |
| 9/29/1993 | 11.47\% | 6.77\% | 4.70\% |
| 9/30/1993 | 11.60\% | 6.76\% | 4.84\% |
| 11/2/1993 | 10.80\% | 6.61\% | 4.19\% |
| 11/12/1993 | 12.00\% | 6.57\% | 5.43\% |
| 11/26/1993 | 11.00\% | 6.52\% | 4.48\% |
| 12/14/1993 | 10.55\% | 6.48\% | 4.07\% |
| 12/16/1993 | 10.60\% | 6.48\% | 4.12\% |
| 12/21/1993 | 11.30\% | 6.47\% | 4.83\% |
| 1/4/1994 | 10.07\% | 6.45\% | 3.62\% |
| 1/13/1994 | 11.00\% | 6.42\% | 4.58\% |
| 1/21/1994 | 11.00\% | 6.40\% | 4.60\% |
| 1/28/1994 | 11.35\% | 6.39\% | 4.96\% |
| 2/3/1994 | 11.40\% | 6.38\% | 5.02\% |
| 2/17/1994 | 10.60\% | 6.36\% | 4.24\% |
| 2/25/1994 | 11.25\% | 6.36\% | 4.89\% |
| 2/25/1994 | 12.00\% | 6.36\% | 5.64\% |
| 3/1/1994 | 11.00\% | 6.35\% | 4.65\% |
| 3/4/1994 | 11.00\% | 6.35\% | 4.65\% |
| 4/25/1994 | 11.00\% | 6.41\% | 4.59\% |
| 5/10/1994 | 11.75\% | 6.45\% | 5.30\% |
| 5/13/1994 | 10.50\% | 6.46\% | 4.04\% |
| 6/3/1994 | 11.00\% | 6.53\% | 4.47\% |
| 6/27/1994 | 11.40\% | 6.64\% | 4.76\% |
| 8/5/1994 | 12.75\% | 6.87\% | 5.88\% |
| 10/31/1994 | 10.00\% | 7.32\% | 2.68\% |
| 11/9/1994 | 10.85\% | 7.38\% | 3.47\% |
| 11/9/1994 | 10.85\% | 7.38\% | 3.47\% |
| 11/18/1994 | 11.20\% | 7.45\% | 3.75\% |
| 11/22/1994 | 11.60\% | 7.46\% | 4.14\% |
| 11/28/1994 | 11.06\% | 7.49\% | 3.57\% |
| 12/8/1994 | 11.50\% | 7.54\% | 3.96\% |
| 12/8/1994 | 11.70\% | 7.54\% | 4.16\% |
| 12/14/1994 | 10.95\% | 7.56\% | 3.39\% |
| 12/15/1994 | 11.50\% | 7.57\% | 3.93\% |
| 12/19/1994 | 11.50\% | 7.57\% | 3.93\% |
| 12/28/1994 | 12.15\% | 7.61\% | 4.54\% |
| 1/9/1995 | 12.28\% | 7.64\% | 4.64\% |
| 1/31/1995 | 11.00\% | 7.68\% | 3.32\% |
| 2/10/1995 | 12.60\% | 7.70\% | 4.90\% |
| 2/17/1995 | 11.90\% | 7.70\% | 4.20\% |
| 3/9/1995 | 11.50\% | 7.71\% | 3.79\% |
| 3/20/1995 | 12.00\% | 7.72\% | 4.28\% |
| 3/23/1995 | 12.81\% | 7.72\% | 5.09\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 3/29/1995 | 11.60\% | 7.72\% | 3.88\% |
| 4/6/1995 | 11.10\% | 7.71\% | 3.39\% |
| 4/7/1995 | 11.00\% | 7.71\% | 3.29\% |
| 4/19/1995 | 11.00\% | 7.70\% | 3.30\% |
| 5/12/1995 | 11.63\% | 7.68\% | 3.95\% |
| 5/25/1995 | 11.20\% | 7.65\% | 3.55\% |
| 6/9/1995 | 11.25\% | 7.60\% | 3.65\% |
| 6/21/1995 | 12.25\% | 7.56\% | 4.69\% |
| 6/30/1995 | 11.10\% | 7.52\% | 3.58\% |
| 9/11/1995 | 11.30\% | 7.21\% | 4.09\% |
| 9/27/1995 | 11.30\% | 7.13\% | 4.17\% |
| 9/27/1995 | 11.50\% | 7.13\% | 4.37\% |
| 9/27/1995 | 11.75\% | 7.13\% | 4.62\% |
| 9/29/1995 | 11.00\% | 7.12\% | 3.88\% |
| 11/9/1995 | 11.38\% | 6.90\% | 4.48\% |
| 11/9/1995 | 12.36\% | 6.90\% | 5.46\% |
| 11/17/1995 | 11.00\% | 6.86\% | 4.14\% |
| 12/4/1995 | 11.35\% | 6.78\% | 4.57\% |
| 12/11/1995 | 11.40\% | 6.75\% | 4.65\% |
| 12/20/1995 | 11.60\% | 6.70\% | 4.90\% |
| 12/27/1995 | 12.00\% | 6.67\% | 5.33\% |
| 215/1996 | 12.25\% | 6.48\% | 5.77\% |
| 3/29/1996 | 10.67\% | 6.42\% | 4.25\% |
| 4/8/1996 | 11.00\% | 6.42\% | 4.58\% |
| 4/11/1996 | 12.59\% | 6.43\% | 6.16\% |
| 4/11/1996 | 12.59\% | 6.43\% | 6.16\% |
| 4/24/1996 | 11.25\% | 6.44\% | 4.81\% |
| 4/30/1996 | 11.00\% | 6.43\% | 4.57\% |
| 5/13/1996 | 11.00\% | 6.44\% | 4.56\% |
| 5/23/1996 | 11.25\% | 6.44\% | 4.81\% |
| 6/25/1996 | 11.25\% | 6.48\% | 4.77\% |
| 6/27/1996 | 11.20\% | 6.48\% | 4.72\% |
| 8/12/1996 | 10.40\% | 6.57\% | 3.83\% |
| 9/27/1996 | 11.00\% | 6.70\% | 4.30\% |
| 10/16/1996 | 12.25\% | 6.76\% | 5.49\% |
| 11/5/1996 | 11.00\% | 6.80\% | 4.20\% |
| 11/26/1996 | 11.30\% | 6.83\% | 4.47\% |
| 12/18/1996 | 11.75\% | 6.83\% | 4.92\% |
| 12/31/1996 | 11.50\% | 6.83\% | 4.67\% |
| 1/3/1997 | 10.70\% | 6.83\% | 3.87\% |
| 2/13/1997 | 11.80\% | 6.82\% | 4.98\% |
| 2/20/1997 | 11.80\% | 6.82\% | 4.98\% |
| 3/31/1997 | 10.02\% | 6.80\% | 3.22\% |
| 4/2/1997 | 11.65\% | 6.80\% | 4.85\% |
| 4/28/1997 | 11.50\% | 6.81\% | 4.69\% |
| 4/29/1997 | 11.70\% | 6.81\% | 4.89\% |
| 7117/1997 | 12.00\% | 6.77\% | 5.23\% |
| 12/12/1997 | 11.00\% | 6.61\% | 4.39\% |
| 12/23/1997 | 11.12\% | 6.57\% | 4.55\% |
| 2/2/1998 | 12.75\% | 6.40\% | 6.35\% |
| 3/2/1998 | 11.25\% | 6.29\% | 4.96\% |


| [6] <br> Date of <br> Electric <br> Rate Case | [7] <br> Return on Equity | [8] <br> Average 30- <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 3/6/1998 | 10.75\% | 6.27\% | 4.48\% |
| 3/20/1998 | 10.50\% | 6.23\% | 4.27\% |
| 4/30/1998 | 12.20\% | 6.12\% | 6.08\% |
| 7110/1998 | 11.40\% | 5.94\% | 5.46\% |
| 9/15/1998 | 11.90\% | 5.78\% | 6.12\% |
| 11/30/1998 | 12.60\% | 5.58\% | 7.02\% |
| 12/10/1998 | 12.20\% | 5.55\% | 6.65\% |
| 12/17/1998 | 12.10\% | 5.52\% | 6.58\% |
| 2/5/1999 | 10.30\% | 5.39\% | 4.91\% |
| 3/4/1999 | 10.50\% | 5.34\% | 5.16\% |
| 4/6/1999 | 10.94\% | 5.32\% | 5.62\% |
| 7129/1999 | 10.75\% | 5.51\% | 5.24\% |
| 9/23/1999 | 10.75\% | 5.70\% | 5.05\% |
| 11/17/1999 | 11.10\% | 5.89\% | 5.21\% |
| 17712000 | 11.50\% | 6.04\% | 5.46\% |
| 1/712000 | 11.50\% | 6.04\% | 5.46\% |
| 2/1712000 | 10.60\% | 6.17\% | 4.43\% |
| 3128/2000 | 11.25\% | 6.19\% | 5.06\% |
| 5/24/2000 | 11.00\% | 6.18\% | 4.82\% |
| 7118/2000 | 12.20\% | 6.16\% | 6.04\% |
| 9/29/2000 | 11.16\% | 6.03\% | 5.13\% |
| 11/28/2000 | 12.90\% | 5.89\% | 7.01\% |
| 11/30/2000 | 12.10\% | 5.88\% | 6.22\% |
| 1/23/2001 | 11.25\% | 5.79\% | 5.46\% |
| 218/2001 | 11.50\% | 5.77\% | 5.73\% |
| 5/8/2001 | 10.75\% | 5.62\% | 5.13\% |
| 6/26/2001 | 11.00\% | 5.62\% | 5.38\% |
| 7/25/2001 | 11.02\% | 5.60\% | 5.42\% |
| 7125/2001 | 11.02\% | 5.60\% | 5.42\% |
| 7/31/2001 | 11.00\% | 5.59\% | 5.41\% |
| 8/31/2001 | 10.50\% | 5.56\% | 4.94\% |
| 9/7/2001 | 10.75\% | 5.55\% | 5.20\% |
| 9/10/2001 | 11.00\% | 5.55\% | 5.45\% |
| 9/20/2001 | 10.00\% | 5.55\% | 4.45\% |
| 10/24/2001 | 10.30\% | 5.54\% | 4.76\% |
| 11/28/2001 | 10.60\% | 5.49\% | 5.11\% |
| 12/3/2001 | 12.88\% | 5.49\% | 7.39\% |
| 12/20/2001 | 12.50\% | 5.50\% | 7.00\% |
| 1/22/2002 | 10.00\% | 5.50\% | 4.50\% |
| 3/27/2002 | 10.10\% | 5.45\% | 4.65\% |
| 4/22/2002 | 11.80\% | 5.45\% | 6.35\% |
| 5/28/2002 | 10.17\% | 5.46\% | 4.71\% |
| 6/10/2002 | 12.00\% | 5.47\% | 6.53\% |
| 6/18/2002 | 11.16\% | 5.48\% | 5.68\% |
| 6/20/2002 | 11.00\% | 5.48\% | 5.52\% |
| 6/20/2002 | 12.30\% | 5.48\% | 6.82\% |
| 7115/2002 | 11.00\% | 5.47\% | 5.53\% |
| 9/12/2002 | 12.30\% | 5.45\% | 6.85\% |
| 9/26/2002 | 10.45\% | 5.41\% | 5.04\% |
| 1214/2002 | 11.55\% | 5.29\% | 6.26\% |
| 12/13/2002 | 11.75\% | 5.27\% | 6.48\% |


| [6] <br> Date of Electric Rate Case | [] <br> Return on Equity | [8] <br> Average 30 - <br> Year <br> Treasury <br> Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 12/20/2002 | 11.40\% | 5.25\% | 6.15\% |
| 1/8/2003 | 11.10\% | 5.19\% | 5.91\% |
| 1/31/2003 | 12.45\% | 5.13\% | 7.32\% |
| 2128/2003 | 12.30\% | 5.05\% | 7.25\% |
| 3/6/2003 | 10.75\% | 5.03\% | 5.72\% |
| 3/712003 | 9.96\% | 5.02\% | 4.94\% |
| 3/20/2003 | 12.00\% | 4.99\% | 7.01\% |
| 4/3/2003 | 12.00\% | 4.96\% | 7.04\% |
| 4/15/2003 | 11.15\% | 4.94\% | 6.21\% |
| 6/25/2003 | 10.75\% | 4.79\% | 5.96\% |
| 6/26/2003 | 10.75\% | 4.79\% | 5.96\% |
| 719/2003 | 9.75\% | 4.79\% | 4.96\% |
| 7116/2003 | 9.75\% | 4.79\% | 4.96\% |
| 7125/2003 | 9.50\% | 4.80\% | 4.70\% |
| 8/26/2003 | 10.50\% | 4.83\% | 5.67\% |
| 12117/2003 | 9.85\% | 4.93\% | 4.92\% |
| 12117/2003 | 10.70\% | 4.93\% | 5.77\% |
| 12/18/2003 | 11.50\% | 4.94\% | 6.56\% |
| 12119/2003 | 12.00\% | 4.94\% | 7.06\% |
| 12/19/2003 | 12.00\% | 4.94\% | 7.06\% |
| 12/23/2003 | 10.50\% | 4.94\% | 5.56\% |
| 1/13/2004 | 12.00\% | 4.95\% | 7.05\% |
| 3/2/2004 | 10.75\% | 4.98\% | 5.77\% |
| 3/26/2004 | 10.25\% | 5.02\% | 5.23\% |
| 4/5/2004 | 11.25\% | 5.03\% | 6.22\% |
| 5/18/2004 | 10.50\% | 5.07\% | 5.43\% |
| 5/25/2004 | 10.25\% | 5.08\% | 5.17\% |
| 5/27/2004 | 10.25\% | 5.08\% | 5.17\% |
| 6/212004 | 11.22\% | 5.08\% | 6.14\% |
| 6/30/2004 | 10.50\% | 5.10\% | 5.40\% |
| 6/30/2004 | 10.50\% | 5.10\% | 5.40\% |
| 7116/2004 | 11.60\% | 5.11\% | 6.49\% |
| 8/25/2004 | 10.25\% | 5.10\% | 5.15\% |
| 9/9/2004 | 10.40\% | 5.10\% | 5.30\% |
| 11/9/2004 | 10.50\% | 5.06\% | 5.44\% |
| 11/23/2004 | 11.00\% | 5.06\% | 5.94\% |
| 12/14/2004 | 10.97\% | 5.06\% | 5.91\% |
| 12/21/2004 | 11.25\% | 5.07\% | 6.18\% |
| 12/21/2004 | 11.50\% | 5.07\% | 6.43\% |
| 12/22/2004 | 10.70\% | 5.07\% | 5.63\% |
| 12122/2004 | 11.50\% | 5.07\% | 6.43\% |
| 12/29/2004 | 9.85\% | 5.07\% | 4.78\% |
| 1/6/2005 | 10.70\% | 5.08\% | 5.62\% |
| 2118/2005 | 10.30\% | 4.98\% | 5.32\% |
| 2125/2005 | 10.50\% | 4.96\% | 5.54\% |
| 3/10/2005 | 11.00\% | 4.93\% | 6.07\% |
| 3/24/2005 | 10.30\% | 4.90\% | 5.40\% |
| 4/4/2005 | 10.00\% | 4.88\% | 5.12\% |
| 4/7/2005 | 10.25\% | 4.87\% | 5.38\% |
| 5/18/2005 | 10.25\% | 4.78\% | 5.47\% |
| 5/25/2005 | 10.75\% | 4.77\% | 5.98\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 5/26/2005 | 9.75\% | 4.76\% | 4.99\% |
| 6/1/2005 | 9.75\% | 4.75\% | 5.00\% |
| 7/19/2005 | 11.50\% | 4.65\% | 6.85\% |
| 8/5/2005 | 11.75\% | 4.62\% | 7.13\% |
| 8/15/2005 | 10.13\% | 4.62\% | 5.51\% |
| 9/28/2005 | 10.00\% | 4.54\% | 5.46\% |
| 1014/2005 | 10.75\% | 4.54\% | 6.21\% |
| 12/12/2005 | 11.00\% | 4.55\% | 6.45\% |
| 12/13/2005 | 10.75\% | 4.55\% | 6.20\% |
| 12/21/2005 | 10.29\% | 4.55\% | 5.74\% |
| 12/21/2005 | 10.40\% | 4.55\% | 5.85\% |
| 12/22/2005 | 11.00\% | 4.54\% | 6.46\% |
| 12/22/2005 | 11.15\% | 4.54\% | 6.61\% |
| 12/28/2005 | 10.00\% | 4.54\% | 5.46\% |
| 12/28/2005 | 10.00\% | 4.54\% | 5.46\% |
| 1/5/2006 | 11.00\% | 4.53\% | 6.47\% |
| 1/27/2006 | 9.75\% | 4.52\% | 5.23\% |
| 3/3/2006 | 10.39\% | 4.53\% | 5.86\% |
| 4/17/2006 | 10.20\% | 4.61\% | 5.59\% |
| 4/26/2006 | 10.60\% | 4.64\% | 5.96\% |
| 5/17/2006 | 11.60\% | 4.69\% | 6.91\% |
| 6/6/2006 | 10.00\% | 4.74\% | 5.26\% |
| 6/27/2006 | 10.75\% | 4.80\% | 5.95\% |
| 716/2006 | 10.20\% | 4.82\% | 5.38\% |
| 7/24/2006 | 9.60\% | 4.86\% | 4.74\% |
| 7/26/2006 | 10.50\% | 4.86\% | 5.64\% |
| 7/28/2006 | 10.05\% | 4.86\% | 5.19\% |
| 8/23/2006 | 9.55\% | 4.89\% | 4.66\% |
| 9/1/2006 | 10.54\% | 4.89\% | 5.65\% |
| 9/14/2006 | 10.00\% | 4.90\% | 5.10\% |
| 10/6/2006 | 9.67\% | 4.92\% | 4.75\% |
| 11/20/2006 | 9.80\% | 4.95\% | 4.85\% |
| 11/21/2006 | 10.08\% | 4.95\% | 5.13\% |
| 11/21/2006 | 10.08\% | 4.95\% | 5.13\% |
| 11/21/2006 | 10.12\% | 4.95\% | 5.17\% |
| 12/1/2006 | 10.25\% | 4.95\% | 5.30\% |
| 12/1/2006 | 10.50\% | 4.95\% | 5.55\% |
| 1217/2006 | 10.75\% | 4.95\% | 5.80\% |
| 12/21/2006 | 10.90\% | 4.95\% | 5.95\% |
| 12/21/2006 | 11.25\% | 4.95\% | 6.30\% |
| 12/22/2006 | 10.25\% | 4.95\% | 5.30\% |
| 1/5/2007 | 10.00\% | 4.95\% | 5.05\% |
| 1/11/2007 | 10.10\% | 4.95\% | 5.15\% |
| 1/11/2007 | 10.10\% | 4.95\% | 5.15\% |
| 1/11/2007 | 10.90\% | 4.95\% | 5.95\% |
| 1/12/2007 | 10.10\% | 4.95\% | 5.15\% |
| 1/13/2007 | 10.40\% | 4.95\% | 5.45\% |
| 1/19/2007 | 10.80\% | 4.94\% | 5.86\% |
| 3/21/2007 | 11.35\% | 4.87\% | 6.48\% |
| 3/22/2007 | 9.75\% | 4.87\% | 4.88\% |
| 5/15/2007 | 10.00\% | 4.81\% | 5.19\% |

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WITNESS: HEVERT
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| [6] <br> Date of Electric Rate Case | [] <br> Return on Equity | [8] Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 5/17/2007 | 10.25\% | 4.81\% | 5.44\% |
| 5/17/2007 | 10.25\% | 4.81\% | 5.44\% |
| 5/22/2007 | 10.20\% | 4.81\% | 5.39\% |
| 5/22/2007 | 10.50\% | 4.81\% | 5.69\% |
| 5/23/2007 | 10.70\% | 4.81\% | 5.89\% |
| 5/25/2007 | 9.67\% | 4.81\% | 4.86\% |
| 6/15/2007 | 9.90\% | 4.82\% | 5.08\% |
| 6/21/2007 | 10.20\% | 4.83\% | 5.37\% |
| 6/22/2007 | 10.50\% | 4.83\% | 5.67\% |
| 6/28/2007 | 10.75\% | 4.84\% | 5.91\% |
| 7/12/2007 | 9.67\% | 4.86\% | 4.81\% |
| 7/19/2007 | 10.00\% | 4.87\% | 5.13\% |
| 7119/2007 | 10.00\% | 4.87\% | 5.13\% |
| 8/15/2007 | 10.40\% | 4.88\% | 5.52\% |
| 10/9/2007 | 10.00\% | 4.91\% | 5.09\% |
| 10/17/2007 | 9.10\% | 4.91\% | 4.19\% |
| 10/31/2007 | 9.96\% | 4.90\% | 5.06\% |
| 11/29/2007 | 10.90\% | 4.87\% | 6.03\% |
| 12/6/2007 | 10.75\% | 4.86\% | 5.89\% |
| 12/13/2007 | 9.90\% | 4.86\% | 5.04\% |
| 12113/2007 | 9.96\% | 4.86\% | 5.10\% |
| 12/14/2007 | 10.70\% | 4.86\% | 5.84\% |
| 12/14/2007 | 10.80\% | 4.86\% | 5.94\% |
| 12/19/2007 | 10.20\% | 4.85\% | 5.35\% |
| 12/20/2007 | 10.20\% | 4.85\% | 5.35\% |
| 12/20/2007 | 11.00\% | 4.85\% | 6.15\% |
| 12/28/2007 | 10.25\% | 4.85\% | 5.40\% |
| 12/31/2007 | 11.25\% | 4.85\% | 6.40\% |
| 1/8/2008 | 10.75\% | 4.83\% | 5.92\% |
| 1/17/2008 | 10.75\% | 4.82\% | 5.93\% |
| 1/28/2008 | 9.40\% | 4.80\% | 4.60\% |
| 1/30/2008 | 10.00\% | 4.79\% | 5.21\% |
| 1/31/2008 | 10.71\% | 4.79\% | 5.92\% |
| 2/29/2008 | 10.25\% | 4.75\% | 5.50\% |
| 3/12/2008 | 10.25\% | 4.73\% | 5.52\% |
| 3/25/2008 | 9.10\% | 4.69\% | 4.41\% |
| 3/31/2008 | 12.12\% | 4.67\% | 7.45\% |
| 4/22/2008 | 10.25\% | 4.61\% | 5.64\% |
| 4/24/2008 | 10.10\% | 4.60\% | 5.50\% |
| 5/1/2008 | 10.70\% | 4.59\% | 6.11\% |
| 5/19/2008 | 11.00\% | 4.57\% | 6.43\% |
| 5/27/2008 | 10.00\% | 4.55\% | 5.45\% |
| 6/10/2008 | 10.70\% | 4.54\% | 6.16\% |
| 6/27/2008 | 10.50\% | 4.54\% | 5.96\% |
| 6/27/2008 | 11.04\% | 4.54\% | 6.50\% |
| 7110/2008 | 10.43\% | 4.52\% | 5.91\% |
| 7116/2008 | 9.40\% | 4.52\% | 4.88\% |
| 7/30/2008 | 10.80\% | 4.51\% | 6.29\% |
| 7/31/2008 | 10.70\% | 4.51\% | 6.19\% |
| 8/11/2008 | 10.25\% | 4.51\% | 5.74\% |
| 8/26/2008 | 10.18\% | 4.50\% | 5.68\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] <br> Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 9/10/2008 | 10.30\% | 4.50\% | 5.80\% |
| 9/24/2008 | 10.65\% | 4.48\% | 6.17\% |
| 9/24/2008 | 10.65\% | 4.48\% | 6.17\% |
| 9/24/2008 | 10.65\% | 4.48\% | 6.17\% |
| 9/30/2008 | 10.20\% | 4.48\% | 5.72\% |
| 10/8/2008 | 10.15\% | 4.46\% | 5.69\% |
| 10/15/2008 | 10.10\% | 4.46\% | 5.64\% |
| 11/13/2008 | 10.55\% | 4.45\% | 6.10\% |
| 11/17/2008 | 10.20\% | 4.44\% | 5.76\% |
| 12/1/2008 | 10.25\% | 4.40\% | 5.85\% |
| 12/23/2008 | 11.00\% | 4.27\% | 6.73\% |
| 12/29/2008 | 10.00\% | 4.24\% | 5.76\% |
| 12/29/2008 | 10.20\% | 4.24\% | 5.96\% |
| 12/31/2008 | 10.75\% | 4.22\% | 6.53\% |
| 1/14/2009 | 10.50\% | 4.15\% | 6.35\% |
| 1/14/2009 | 10.60\% | 4.15\% | 6.45\% |
| 1/21/2009 | 10.50\% | 4.12\% | 6.38\% |
| 1/21/2009 | 10.50\% | 4.12\% | 6.38\% |
| 1/21/2009 | 10.50\% | 4.12\% | 6.38\% |
| 1/27/2009 | 10.76\% | 4.09\% | 6.67\% |
| 1/30/2009 | 10.50\% | 4.08\% | 6.42\% |
| 2/4/2009 | 8.75\% | 4.06\% | 4.69\% |
| 3/4/2009 | 10.50\% | 3.97\% | 6.53\% |
| 3/12/2009 | 11.50\% | 3.93\% | 7.57\% |
| 4/2/2009 | 11.10\% | 3.86\% | 7.24\% |
| 4/21/2009 | 10.61\% | 3.80\% | 6.81\% |
| 4/24/2009 | 10.00\% | 3.79\% | 6.21\% |
| 4/30/2009 | 11.25\% | 3.78\% | 7.47\% |
| 5/4/2009 | 10.74\% | 3.77\% | 6.97\% |
| 5/20/2009 | 10.25\% | 3.75\% | 6.50\% |
| 5/28/2009 | 10.50\% | 3.75\% | 6.75\% |
| 5/29/2009 | 10.50\% | 3.75\% | 6.75\% |
| 6/22/2009 | 10.00\% | 3.77\% | 6.23\% |
| 6/24/2009 | 10.80\% | 3.77\% | 7.03\% |
| 718/2009 | 10.63\% | 3.77\% | 6.86\% |
| 7/17/2009 | 10.50\% | 3.78\% | 6.72\% |
| 8/31/2009 | 10.25\% | 3.82\% | 6.43\% |
| 10/14/2009 | 10.70\% | 4.01\% | 6.69\% |
| 10/23/2009 | 10.88\% | 4.05\% | 6.83\% |
| 11/2/2009 | 10.70\% | 4.09\% | 6.61\% |
| 11/3/2009 | 10.70\% | 4.09\% | 6.61\% |
| 11/24/2009 | 10.25\% | 4.15\% | 6.10\% |
| 11/25/2009 | 10.75\% | 4.15\% | 6.60\% |
| 11/30/2009 | 10.35\% | 4.16\% | 6.19\% |
| 12/3/2009 | 10.50\% | 4.17\% | 6.33\% |
| 12/7/2009 | 10.70\% | 4.18\% | 6.52\% |
| 12/16/2009 | 10.90\% | 4.21\% | 6.69\% |
| 12/16/2009 | 11.00\% | 4.21\% | 6.79\% |
| 12/18/2009 | 10.40\% | 4.22\% | 6.18\% |
| 12/18/2009 | 10.40\% | 4.22\% | 6.18\% |
| 12/22/2009 | 10.20\% | 4.23\% | 5.97\% |

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[6]
Date of
Electric
[7]
[8]
Average 30Year Rate Case 12/22/2009 $12 / 22 / 2009$
$12 / 30 / 2009$ $12 / 30 / 2009$
$1 / 4 / 2010$ 1/11/2010 1/26/2010 1/27/2010 1/27/2010 $1 / 27 / 2010$
$2 / 9 / 2010$ 2/9/2010
2/18/2010 reasury

## [9]

$2 / 24 / 2010 \quad 10.18 \% \quad 4.41 \% \quad 5.77 \%$

| $3 / 2 / 2010$ | $9.63 \%$ | $4.41 \%$ | $5.22 \%$ |
| ---: | ---: | ---: | ---: |


| $3 / 4 / 2010$ | $10.50 \%$ | $4.41 \%$ | $6.09 \%$ |
| :--- | :--- | :--- | :--- |
| $3 / 5 / 2010$ | $10.50 \%$ | $4.41 \%$ | $6.09 \%$ |

$3 / 11 / 2010 \quad 11.90 \% \quad 4.42 \% \quad 7.48 \%$

| $3 / 11 / 2010$ | $12.30 \%$ | $4.42 \%$ | $7.88 \%$ |
| :--- | :--- | :--- | :--- |
| $3 / 11 / 2010$ | $12.30 \%$ | $4.42 \%$ | $7.88 \%$ |


| $3 / 11 / 2010$ | $12.30 \%$ | $4.42 \%$ | $7.88 \%$ |
| :--- | :--- | :--- | :--- |
| $3 / 17 / 2010$ | $10.00 \%$ | $4.42 \%$ | $5.58 \%$ |


| $3 / 25 / 2010$ | $10.15 \%$ | $4.42 \%$ | $5.73 \%$ |
| ---: | ---: | ---: | ---: |
| $4 / 2 / 2010$ | $10.10 \%$ | $4.43 \%$ | $5.67 \%$ |


| $4 / 27 / 2010$ | $10.00 \%$ | $4.46 \%$ | $5.54 \%$ |
| ---: | ---: | ---: | ---: |
| $4 / 29 / 2010$ | $9.90 \%$ | $4.46 \%$ | $5.44 \%$ |

4/29/2010 $\quad 10.06 \% \quad 4.46 \% ~ 5.60 \%$

| $4 / 29 / 2010$ | $10.26 \%$ | $4.46 \%$ | $5.80 \%$ |
| :--- | :--- | :--- | :--- |
| $5 / 12 / 2010$ | $10.30 \%$ | $4.46 \%$ | $5.84 \%$ |
| $5 / 12 / 2010$ | $10.30 \%$ | $4.46 \%$ | $5.84 \%$ |


| $5 / 12 / 2010$ | $10.30 \%$ | $4.46 \%$ | $5.84 \%$ |
| :--- | :--- | :--- | :--- |
| $5 / 28 / 2010$ | $10.10 \%$ | $4.44 \%$ | $5.66 \%$ |


| $5 / 28 / 2010$ | $10.20 \%$ | $4.44 \%$ | $5.76 \%$ |
| ---: | ---: | ---: | ---: |
| $6 / 7 / 2010$ | $10.30 \%$ | $4.44 \%$ | $5.86 \%$ |


| $6 / 16 / 2010$ | $10.00 \%$ | $4.44 \%$ | $5.56 \%$ |
| ---: | ---: | ---: | ---: |
| $6 / 28 / 2010$ | $9.67 \%$ | $4.43 \%$ | $5.24 \%$ |

6/28/2010 $\quad 10.50 \% \quad 4.43 \% \quad 6.07 \%$

| $6 / 30 / 2010$ | $9.40 \%$ | $4.43 \%$ | $4.97 \%$ |
| ---: | ---: | ---: | ---: |
| $7 / 1 / 2010$ | $10.25 \%$ | $4.43 \%$ | $5.82 \%$ |


| $7 / 15 / 2010$ | $10.53 \%$ | $4.43 \%$ | $6.10 \%$ |
| :--- | :--- | :--- | :--- |
| $7 / 15 / 2010$ | $10.70 \%$ | $4.43 \%$ | $6.27 \%$ |

$7130 / 2010 \quad 10.70 \% \quad 4.41 \% \quad 6.29 \%$

| $8 / 4 / 2010$ | $10.50 \%$ | $4.41 \%$ | $6.09 \%$ |
| ---: | ---: | ---: | ---: |
| $8 / 6 / 2010$ | $9.83 \%$ | $4.41 \%$ | $5.42 \%$ |
| $8 / 25 / 2010$ | $9.90 \%$ | $4.37 \%$ | $5.53 \%$ |
| $9 / 3 / 2010$ | $10.60 \%$ | $4.35 \%$ | $6.25 \%$ |
| $9 / 14 / 2010$ | $10.70 \%$ | $4.33 \%$ | $6.37 \%$ |
| $9 / 16 / 2010$ | $10.00 \%$ | $4.33 \%$ | $5.67 \%$ |
| $9 / 16 / 2010$ | $10.00 \%$ | $4.33 \%$ | $5.67 \%$ |
| $9 / 30 / 2010$ | $9.75 \%$ | $4.29 \%$ | $5.46 \%$ |
| $9 / 30 / 2010$ | $11.00 \%$ | $4.29 \%$ | $6.71 \%$ |
| $10 / 14 / 2010$ | $10.35 \%$ | $4.24 \%$ | $6.11 \%$ |
| $10 / 28 / 2010$ | $10.70 \%$ | $4.21 \%$ | $6.49 \%$ |
| $11 / 2 / 2010$ | $10.38 \%$ | $4.20 \%$ | $6.18 \%$ |
| $11 / 4 / 2010$ | $10.70 \%$ | $4.20 \%$ | $6.50 \%$ |



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| [6] <br> Date of Electric Rate Case | $[7]$ <br> Return on Equity | [8] Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 12/21/2011 | 10.20\% | 3.76\% | 6.44\% |
| 12/22/2011 | 9.90\% | 3.75\% | 6.15\% |
| 12/22/2011 | 10.40\% | 3.75\% | 6.65\% |
| 12/23/2011 | 10.19\% | 3.75\% | 6.44\% |
| 1/3/2012 | 11.40\% | 3.69\% | 7.71\% |
| 1/25/2012 | 10.50\% | 3.57\% | 6.93\% |
| 1/27/2012 | 10.50\% | 3.56\% | 6.94\% |
| 2/2/2012 | 11.40\% | 3.53\% | 7.87\% |
| 2/15/2012 | 10.20\% | 3.48\% | 6.72\% |
| 2/23/2012 | 9.90\% | 3.44\% | 6.46\% |
| 2/27/2012 | 10.25\% | 3.43\% | 6.82\% |
| 2/29/2012 | 10.40\% | 3.42\% | 6.98\% |
| 3/16/2012 | 12.40\% | 3.36\% | 9.04\% |
| 3/20/2012 | 11.40\% | 3.35\% | 8.05\% |
| 3/23/2012 | 11.40\% | 3.34\% | 8.06\% |
| 3/29/2012 | 10.37\% | 3.32\% | 7.05\% |
| 4/4/2012 | 10.00\% | 3.30\% | 6.70\% |
| 4/26/2012 | 10.00\% | 3.21\% | 6.79\% |
| 5/2/2012 | 10.00\% | 3.19\% | 6.81\% |
| 5/7/2012 | 9.80\% | 3.17\% | 6.63\% |
| 5/15/2012 | 10.00\% | 3.15\% | 6.85\% |
| 5/29/2012 | 10.05\% | 3.11\% | 6.94\% |
| 6/7/2012 | 10.30\% | 3.08\% | 7.22\% |
| 6/14/2012 | 9.40\% | 3.06\% | 6.34\% |
| 6/15/2012 | 10.40\% | 3.06\% | 7.34\% |
| 6/18/2012 | 9.60\% | 3.06\% | 6.54\% |
| 6/19/2012 | 9.25\% | 3.05\% | 6.20\% |
| 6/26/2012 | 10.10\% | 3.04\% | 7.06\% |
| 6/29/2012 | 10.00\% | 3.04\% | 6.96\% |
| 719/2012 | 10.20\% | 3.03\% | 7.17\% |
| 7/16/2012 | 9.80\% | 3.02\% | 6.78\% |
| 7/20/2012 | 9.31\% | 3.01\% | 6.30\% |
| 7/20/2012 | 9.81\% | 3.01\% | 6.80\% |
| 9/13/2012 | 9.80\% | 2.94\% | 6.86\% |
| 9/19/2012 | 9.80\% | 2.94\% | 6.86\% |
| 9/19/2012 | 10.05\% | 2.94\% | 7.11\% |
| 9/26/2012 | 9.50\% | 2.94\% | 6.56\% |
| 10/12/2012 | 9.60\% | 2.93\% | 6.67\% |
| 10/23/2012 | 9.75\% | 2.93\% | 6.82\% |
| 10/24/2012 | 10.30\% | 2.93\% | 7.37\% |
| 11/9/2012 | 10.30\% | 2.92\% | 7.38\% |
| 11/28/2012 | 10.40\% | 2.90\% | 7.50\% |
| 11/29/2012 | 9.75\% | 2.90\% | 6.85\% |
| 11/29/2012 | 9.88\% | 2.90\% | 6.98\% |
| 12/5/2012 | 9.71\% | 2.89\% | 6.82\% |
| 12/5/2012 | 10.40\% | 2.89\% | 7.51\% |
| 12/12/2012 | 9.80\% | 2.88\% | 6.92\% |
| 12/13/2012 | 9.50\% | 2.88\% | 6.62\% |
| 12/13/2012 | 10.50\% | 2.88\% | 7.62\% |
| 12/14/2012 | 10.40\% | 2.88\% | 7.52\% |
| 12/19/2012 | 9.71\% | 2.88\% | 6.83\% |

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| [6] <br> Date of Electric Rate Case | [7] <br> Return on Equity | [8] Average 30Year Treasury Yield | [9] <br> Risk Premium |
| :---: | :---: | :---: | :---: |
| 12/19/2012 | 10.25\% | 2.88\% | 7.37\% |
| 12/20/2012 | 9.50\% | 2.88\% | 6.62\% |
| 12/20/2012 | 9.80\% | 2.88\% | 6.92\% |
| 12/20/2012 | 10.25\% | 2.88\% | 7.37\% |
| 12/20/2012 | 10.25\% | 2.88\% | 7.37\% |
| 12/20/2012 | 10.30\% | 2.88\% | 7.42\% |
| 12/20/2012 | 10.40\% | 2.88\% | 7.52\% |
| 12/20/2012 | 10.45\% | 2.88\% | 7.57\% |
| 12/21/2012 | 10.20\% | 2.88\% | 7.32\% |
| 12/26/2012 | 9.80\% | 2.87\% | 6.93\% |
| 1/9/2013 | 9.70\% | 2.85\% | 6.85\% |
| 1/9/2013 | 9.70\% | 2.85\% | 6.85\% |
| 1/9/2013 | 9.70\% | 2.85\% | 6.85\% |
| 1/16/2013 | 9.60\% | 2.84\% | 6.76\% |
| 1/16/2013 | 9.60\% | 2.84\% | 6.76\% |
| 2/13/2013 | 10.20\% | 2.85\% | 7.35\% |
|  |  | Average er of Cases | $\begin{aligned} & 4.39 \% \\ & 1,392 \end{aligned}$ |

DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue／Net Plant | Change in Net Plant | Change in Revenue／Net Plant |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ALE | 2002 | NA |  | NA |  |  |  |  |  |
| ALE | 2003 | NA |  | NA |  |  |  |  |  |
| ALE | 2004 | \＄ | 751.40 | \＄ | 883.10 | 85．09\％ |  |  |  |
| ALE | 2005 |  | 737.40 |  | 860.40 | 85．70\％ | －2．57\％ | 0．73\％ |  |
| ALE | 2006 |  | 767.10 |  | 921.60 | 83．24\％ | 7．11\％ | －2．88\％ |  |
| ALE | 2007 |  | 841.70 |  | 1，104．50 | 76．21\％ | 19．85\％ | －8．44\％ |  |
| ALE | 2008 |  | 801.00 |  | 1，387．30 | 57．74\％ | 25．60\％ | －24．23\％ |  |
| ALE | 2009 |  | 759.10 |  | 1，622．70 | 46．78\％ | 16．97\％ | －18．98\％ |  |
| ALE | 2010 |  | 907.00 |  | 1，805．60 | 50．23\％ | 11．27\％ | 7．38\％ |  |
| ALE | 2011 |  | 928.20 |  | 1，982．70 | 46．81\％ | 9．81\％ | －6．80\％ |  |
| ALE | 2012 |  | 955.00 |  | 2，325．00 | 41．08\％ | 17．26\％ | －12．26\％ |  |
| ALE | 2013 |  | 1，005．00 |  | 2，515．00 | 39．96\％ | 8．17\％ | －2．71\％ |  |
| ALE | 2015－2017 |  | 1，180．00 |  | 2，825．00 | 41．77\％ | 12．33\％ | 4．53\％ |  |
| LNT | 2002 | \＄ | 2，608．80 | \＄ | 3，729．20 | 69．96\％ |  |  |  |
| LNT | 2003 |  | 3，128．20 |  | 4，432．60 | 70．57\％ | 18．86\％ | 0．88\％ |  |
| LNT | 2004 |  | 2，958．70 |  | 5，284．60 | 55．99\％ | 19．22\％ | －20．67\％ |  |
| LNT | 2005 |  | 3，279．60 |  | 4，866．20 | 67．40\％ | －7．92\％ | 20．38\％ |  |
| LNT | 2006 |  | 3，359．40 |  | 4，944．90 | 67．94\％ | 1．62\％ | 0．80\％ |  |
| LNT | 2007 |  | 3，437．60 |  | 4，679．90 | 73．45\％ | －5．36\％ | 8．12\％ |  |
| LNT | 2008 |  | 3，681．70 |  | 5，353．50 | 68．77\％ | 14．39\％ | －6．38\％ |  |
| LNT | 2009 |  | 3，432．80 |  | 6，203．00 | 55．34\％ | 15．87\％ | －19．53\％ |  |
| LNT | 2010 |  | 3，416．10 |  | 6，730．60 | 50．75\％ | 8．51\％ | －8．29\％ |  |
| LNT | 2011 |  | 3，665．30 |  | 7，037．10 | 52．09\％ | 4．55\％ | 2．62\％ |  |
| LNT | 2012 |  | 3，100．00 |  | 7，500．00 | 41．33\％ | 6．58\％ | －20．64\％ |  |
| LNT | 2013 |  | 3，300．00 |  | 7，800．00 | 42．31\％ | 4．00\％ | 2．36\％ |  |
| LNT | 2015－2017 |  | 4，500．00 |  | 8，500．00 | 52．94\％ | 8．97\％ | 25．13\％ | 边边 |
| AEE | 2002 | \＄ | 3，841．00 | \＄ | 8，914．00 | 43．09\％ |  |  |  |
| AEE | 2003 |  | 4，593．00 |  | 10，917．00 | 42．07\％ | 22．47\％ | －2．36\％ |  |
| AEE | 2004 |  | 5，160．00 |  | 13，297．00 | 38．81\％ | 21．80\％ | －7．76\％ |  |
| AEE | 2005 |  | 6，780．00 |  | 13，572．00 | 49．96\％ | 2．07\％ | 28．73\％ |  |
| AEE | 2006 |  | 6，880．00 |  | 14，286．00 | 48．16\％ | 5．26\％ | －3．60\％ |  |
| AEE | 2007 |  | 7，546．00 |  | 15，069．00 | 50．08\％ | 5．48\％ | 3．98\％ | N，辰 |
| AEE | 2008 |  | 7，839．00 |  | 16，567．00 | 47．32\％ | 9．94\％ | －5．51\％ | N ${ }^{\circ}$ 界 ${ }^{\circ}$ |
| AEE | 2009 |  | 7，090．00 |  | 17，610．00 | 40．26\％ | 6．30\％ | －14．91\％ |  |
| AEE | 2010 |  | 7，638．00 |  | 17，853．00 | 42．78\％ | 1．38\％ | 6．26\％ | 婴 |
| AEE | 2011 |  | 7，531．00 |  | 18，127．00 | 41．55\％ | 1．53\％ | －2．89\％ | 思 |

DuPont Formula


DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| BKH | 2009 |  | 1,269.60 |  | 2,160.70 | 58.76\% | 6.85\% | 18.14\% |
| BKH | 2010 |  | 1,307.30 |  | 2,495.40 | 52.39\% | 15.49\% | -10.84\% |
| BKH | 2011 |  | 1,272.20 |  | 2,789.60 | 45.61\% | 11.79\% | -12.95\% |
| BKH | 2012 |  | 1,215.00 |  | 2,975.00 | 40.84\% | 6.65\% | -10.45\% |
| BKH | 2013 |  | 1,280.00 |  | 3,265.00 | 39.20\% | 9.75\% | -4.01\% |
| BKH | 2015-2017 |  | 1,480.00 |  | 3,875.00 | 38.19\% | 18.68\% | -2.58\% |
| CNP | 2002 | \$ | 7,922.50 | \$ | 11,409.00 | 69.44\% |  |  |
| CNP | 2003 |  | 9,760.10 |  | 11,812.00 | 82.63\% | 3.53\% | 18.99\% |
| CNP | 2004 |  | 8,510.40 |  | 8,186.40 | 103.96\% | -30.69\% | 25.81\% |
| CNP | 2005 |  | 9,722.00 |  | 8,492.00 | 114.48\% | 3.73\% | 10.13\% |
| CNP | 2006 |  | 9,319.00 |  | 9,204.00 | 101.25\% | 8.38\% | -11.56\% |
| CNP | 2007 |  | 9,623.00 |  | 9,740.00 | 98.80\% | 5.82\% | -2.42\% |
| CNP | 2008 |  | 11,322.00 |  | 10,296.00 | 109.97\% | 5.71\% | 11.30\% |
| CNP | 2009 |  | 8,281.00 |  | 10,788.00 | 76.76\% | 4.78\% | -30.19\% |
| CNP | 2010 |  | 8,785.00 |  | 11,732.00 | 74.88\% | 8.75\% | -2.45\% |
| CNP | 2011 |  | 8,450.00 |  | 12,402.00 | 68.13\% | 5.71\% | -9.01\% |
| CNP | 2012 |  | 7,250.00 |  | 13,200.00 | 54.92\% | 6.43\% | -19.39\% |
| CNP | 2013 |  | 7,700.00 |  | 13,300.00 | 57.89\% | 0.76\% | 5.41\% |
| CNP | 2015-2017 |  | 8,700.00 |  | 12,900.00 | 67.44\% | -3.01\% | 16.49\% |
| CHG | 2002 | \$ | 695.50 | \$ | 601.70 | 115.59\% |  |  |
| CHG | 2003 |  | 806.70 |  | 707.50 | 114.02\% | 17.58\% | -1.36\% |
| CHG | 2004 |  | 791.50 |  | 745.10 | 106.23\% | 5.31\% | -6.84\% |
| CHG | 2005 |  | 972.50 |  | 779.50 | 124.76\% | 4.62\% | 17.45\% |
| CHG | 2006 |  | 993.40 |  | 827.10 | 120.11\% | 6.11\% | -3.73\% |
| CHG | 2007 |  | 1,196.80 |  | 891.30 | 134.28\% | 7.76\% | 11.80\% |
| CHG | 2008 |  | 1,332.90 |  | 945.90 | 140.91\% | 6.13\% | 4.94\% |
| CHG | 2009 |  | 931.60 |  | 1,012.40 | 92.02\% | 7.03\% | -34.70\% |
| CHG | 2010 |  | 972.30 |  | 1,054.70 | 92.19\% | 4.18\% | 0.18\% |
| CHG | 2011 |  | 985.50 |  | 1,131.40 | 87.10\% | 7.27\% | -5.51\% |
| CHG | 2012 |  | 940.00 |  | 1,180.00 | 79.66\% | 4.30\% | -8.55\% |
| CHG | 2013 |  | 1,010.00 |  | 1,230.00 | 82.11\% | 4.24\% | 3.08\% |
| CHG | 2015-2017 |  | 1,230.00 |  | 1,300.00 | 94.62\% | 5.69\% | 15.22\% |
| CNL | 2002 | \$ | 721.20 | \$ | 1,566.20 | 46.05\% |  |  |
| CNL | 2003 |  | 874.60 |  | 1,417.10 | 61.72\% | -9.52\% | 34.03\% |
| CNL | 2004 |  | 745.80 |  | 1,060.00 | 70.36\% | -25.20\% | 14.00\% |
| CNL | 2005 |  | 920.20 |  | 1,188.70 | 77.41\% | 12.14\% | 10.03\% |

[^22]DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| CNL | 2006 |  | 1,000.70 |  | 1,304.90 | 76.69\% | 9.78\% | -0.94\% |
| CNL | 2007 |  | 1,030.60 |  | 1,725.90 | 59.71\% | 32.26\% | -22.13\% |
| CNL | 2008 |  | 1,080.20 |  | 2,045.30 | 52.81\% | 18.51\% | -11.56\% |
| CNL | 2009 |  | 853.80 |  | 2,247.00 | 38.00\% | 9.86\% | -28.05\% |
| CNL | 2010 |  | 1,148.70 |  | 2,784.20 | 41.26\% | 23.91\% | 8.58\% |
| CNL | 2011 |  | 1,117.30 |  | 2,893.90 | 38.61\% | 3.94\% | -6.42\% |
| CNL | 2012 |  | 950.00 |  | 2,980.00 | 31.88\% | 2.98\% | -17.43\% |
| CNL | 2013 |  | 1,000.00 |  | 2,945.00 | 33.96\% | -1.17\% | 6.51\% |
| CNL | 2015-2017 |  | 1,250.00 |  | 2,775.00 | 45.05\% | -5.77\% | 32.66\% |
| CMS | 2002 | \$ | 8,687.00 | \$ | 5,234.00 | 165.97\% |  |  |
| CMS | 2003 |  | 5,513.00 |  | 6,944.00 | 79.39\% | 32.67\% | -52.17\% |
| CMS | 2004 |  | 5,472.00 |  | 8,636.00 | 63.36\% | 24.37\% | -20.19\% |
| CMS | 2005 |  | 6,288.00 |  | 7,845.00 | 80.15\% | -9.16\% | 26.50\% |
| CMS | 2006 |  | 6,810.00 |  | 7,976.00 | 85.38\% | 1.67\% | 6.52\% |
| CMS | 2007 |  | 6,519.00 |  | 8,728.00 | 74.69\% | 9.43\% | -12.52\% |
| CMS | 2008 |  | 6,821.00 |  | 9,190.00 | 74.22\% | 5.29\% | -0.63\% |
| CMS | 2009 |  | 6,205.00 |  | 9,682.00 | 64.09\% | 5.35\% | -13.65\% |
| CMS | 2010 |  | 6,432.00 |  | 10,069.00 | 63.88\% | 4.00\% | -0.33\% |
| CMS | 2011 |  | 6,503.00 |  | 10,633.00 | 61.16\% | 5.60\% | -4.26\% |
| CMS | 2012 |  | 6,200.00 |  | 11,500.00 | 53.91\% | 8.15\% | -11.85\% |
| CMS | 2013 |  | 6,350.00 |  | 12,275.00 | 51.73\% | 6.74\% | -4.05\% |
| CMS | 2015-2017 |  | 7,200.00 |  | 14,500.00 | 49.66\% | 18.13\% | -4.01\% |
| ED | 2002 | \$ | 8,482.00 | \$ | 13,329.00 | 63.64\% |  |  |
| ED | 2003 |  | 9,827.00 |  | 15,225.00 | 64.55\% | 14.22\% | 1.43\% |
| ED | 2004 |  | 9,758.00 |  | 16,106.00 | 60.59\% | 5.79\% | -6.13\% |
| ED | 2005 |  | 11,690.00 |  | 17,112.00 | 68.31\% | 6.25\% | 12.76\% |
| ED | 2006 |  | 12,137.00 |  | 18,445.00 | 65.80\% | 7.79\% | -3.68\% |
| ED | 2007 |  | 13,120.00 |  | 19,914.00 | 65.88\% | 7.96\% | 0.13\% |
| ED | 2008 |  | 13,583.00 |  | 20,874.00 | 65.07\% | 4.82\% | -1.23\% |
| ED | 2009 |  | 13,032.00 |  | 22,464.00 | 58.01\% | 7.62\% | -10.85\% |
| ED | 2010 |  | 13,325.00 |  | 23,863.00 | 55.84\% | 6.23\% | -3.75\% |
| ED | 2011 |  | 12,938.00 |  | 25,093.00 | 51.56\% | 5.15\% | -7.66\% |
| ED | 2012 |  | 12,100.00 |  | 26,350.00 | 45.92\% | 5.01\% | -10.94\% |
| ED | 2013 |  | 12,500.00 |  | 27,500.00 | 45.45\% | 4.36\% | -1.01\% |
| ED | 2015-2017 |  | 13,800.00 |  | 30,200.00 | 45.70\% | 9.82\% | 0.53\% |
| D | 2002 | \$ | 10,218.00 | \$ | 20,257.00 | 50.44\% |  |  |

DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue／Net Plant | Change in Net Plant | Change in Revenue／Net Plant |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| D | 2003 |  | 12，078．00 |  | 25，850．00 | 46．72\％ | 27．61\％ | －7．37\％ |  |
| D | 2004 |  | 13，972．00 |  | 26，716．00 | 52．30\％ | 3．35\％ | 11．93\％ |  |
| D | 2005 |  | 18，041．00 |  | 28，940．00 | 62．34\％ | 8．32\％ | 19．20\％ |  |
| D | 2006 |  | 16，482．00 |  | 29，382．00 | 56．10\％ | 1．53\％ | －10．02\％ |  |
| D | 2007 |  | 15，674．00 |  | 21，352．00 | 73．41\％ | －27．33\％ | 30．86\％ |  |
| D | 2008 |  | 16，290．00 |  | 23，274．00 | 69．99\％ | 9．00\％ | －4．65\％ |  |
| D | 2009 |  | 15，131．00 |  | 25，592．00 | 59．12\％ | 9．96\％ | －15．53\％ |  |
| D | 2010 |  | 15，197．00 |  | 26，713．00 | 56．89\％ | 4．38\％ | －3．78\％ |  |
| D | 2011 |  | 14，379．00 |  | 29，670．00 | 48．46\％ | 11．07\％ | －14．81\％ |  |
| D | 2012 |  | 13，200．00 |  | 32，500．00 | 40．62\％ | 9．54\％ | －16．19\％ |  |
| D | 2013 |  | 13，700．00 |  | 35，775．00 | 38．29\％ | 10．08\％ | －5．71\％ |  |
| D | 2015－2017 |  | 15，400．00 |  | 43，500．00 | 35．40\％ | 21．59\％ | －7．55\％ |  |
| DTE | 2002 | \＄ | 6，749．00 | \＄ | 9，813．00 | 68．78\％ |  |  |  |
| DTE | 2003 |  | 7，041．00 |  | 10，324．00 | 68．20\％ | 5．21\％ | －0．84\％ |  |
| DTE | 2004 |  | 7，114．00 |  | 10，491．00 | 67．81\％ | 1．62\％ | －0．57\％ |  |
| DTE | 2005 |  | 9，022．00 |  | 10，830．00 | 83．31\％ | 3．23\％ | 22．85\％ |  |
| DTE | 2006 |  | 9，022．00 |  | 11，451．00 | 78．79\％ | 5．73\％ | －5．42\％ |  |
| DTE | 2007 |  | 8，861．00 |  | 11，408．00 | 77．67\％ | －0．38\％ | －1．41\％ |  |
| DTE | 2008 |  | 9，329．00 |  | 12，231．00 | 76．27\％ | 7．21\％ | －1．80\％ |  |
| DTE | 2009 |  | 8，014．00 |  | 12，431．00 | 64．47\％ | 1．64\％ | －15．48\％ |  |
| DTE | 2010 |  | 8，557．00 |  | 12，992．00 | 65．86\％ | 4．51\％ | 2．17\％ |  |
| DTE | 2011 |  | 8，897．00 |  | 13，746．00 | 64．72\％ | 5．80\％ | －1．73\％ |  |
| DTE | 2012 |  | 8，600．00 |  | 14，825．00 | 58．01\％ | 7．85\％ | －10．37\％ |  |
| DTE | 2013 |  | 9，000．00 |  | 15，575．00 | 57．78\％ | 5．06\％ | －0．39\％ |  |
| DTE | 2015－2017 |  | 10，350．00 |  | 17，500．00 | 59．14\％ | 12．36\％ | 2．35\％ |  |
| DUK | 2002 | NA |  | NA |  |  |  |  |  |
| DUK | 2003 | NA |  | NA |  |  |  |  |  |
| DUK | 2004 | NA |  | NA |  |  |  |  | ＂吹式的号け |
| DUK | 2005 | NA |  | NA |  |  |  |  |  |
| DUK | 2006 | \＄ | 10，607．00 | \＄ | 41，447．00 | 25．59\％ |  |  |  |
| DUK | 2007 |  | 12，720．00 |  | 31，110．00 | 40．89\％ | －24．94\％ | 59．77\％ | －¢ O ¢－ |
| DUK | 2008 |  | 13，207．00 |  | 34，036．00 | 38．80\％ | 9．41\％ | －5．10\％ | $\cdots$ 耑 |
| DUK | 2009 |  | 12，731．00 |  | 37，950．00 | 33．55\％ | 11．50\％ | －13．55\％ | N |
| DUK | 2010 |  | 14，272．00 |  | 40，344．00 | 35．38\％ | 6．31\％ | 5．45\％ | $\underset{\omega}{\omega} \quad \dot{\sim}$ |
| DUK | 2011 |  | 14，529．00 |  | 42，661．00 | 34．06\％ | 5．74\％ | －3．73\％ | 婴回 |
| DUK | 2012 |  | 19，900．00 |  | 68，800．00 | 28．92\％ | 61．27\％ | －15．07\％ | 号 |

DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| DUK | 2013 |  | 25,500.00 |  | 71,950.00 | 35.44\% | 4.58\% | 22.53\% |
| DUK | 2015-2017 |  | 29,000.00 |  | 82,400.00 | 35.19\% | 14.52\% | -0.70\% |
| EIX | 2002 | \$ | 11,488.00 | \$ | 8,247.00 | 139.30\% |  |  |
| EIX | 2003 |  | 12,135.00 |  | 12,587.00 | 96.41\% | 52.63\% | -30.79\% |
| EIX | 2004 |  | 10,199.00 |  | 13,475.00 | 75.69\% | 7.05\% | -21.49\% |
| EIX | 2005 |  | 11,852.00 |  | 14,469.00 | 81.91\% | 7.38\% | 8.22\% |
| EIX | 2006 |  | 12,622.00 |  | 15,913.00 | 79.32\% | 9.98\% | -3.17\% |
| EIX | 2007 |  | 13,113.00 |  | 17,403.00 | 75.35\% | 9.36\% | -5.00\% |
| EIX | 2008 |  | 14,112.00 |  | 18,969.00 | 74.40\% | 9.00\% | -1.27\% |
| EIX | 2009 |  | 12,374.00 |  | 21,966.00 | 56.33\% | 15.80\% | -24.28\% |
| EIX | 2010 |  | 12,409.00 |  | 24,778.00 | 50.08\% | 12.80\% | -11.10\% |
| EIX | 2011 |  | 12,760.00 |  | 32,116.00 | 39.73\% | 29.61\% | -20.67\% |
| EIX | 2012 |  | 12,000.00 |  | 30,550.00 | 39.28\% | -4.88\% | -1.14\% |
| EIX | 2013 |  | 12,700.00 |  | 32,900.00 | 38.60\% | 7.69\% | -1.73\% |
| EIX | 2015-2017 |  | 15,500.00 |  | 38,700.00 | 40.05\% | 17.63\% | 3.76\% |
| EE | 2002 |  | 690.10 | \$ | 1,345.00 | 51.31\% |  |  |
| EE | 2003 |  | 664.40 |  | 1,298.00 | 51.19\% | -3.49\% | -0.24\% |
| EE | 2004 |  | 708.60 |  | 1,283.00 | 55.23\% | -1.16\% | 7.90\% |
| EE | 2005 |  | 803.90 |  | 1,291.70 | 62.24\% | 0.68\% | 12.68\% |
| EE | 2006 |  | 816.50 |  | 1,332.20 | 61.29\% | 3.14\% | -1.52\% |
| EE | 2007 |  | 877.40 |  | 1,450.60 | 60.49\% | 8.89\% | -1.31\% |
| EE | 2008 |  | 1,038.90 |  | 1,595.60 | 65.11\% | 10.00\% | 7.65\% |
| EE | 2009 |  | 828.00 |  | 1,756.00 | 47.15\% | 10.05\% | -27.58\% |
| EE | 2010 |  | 877.30 |  | 1,865.80 | 47.02\% | 6.25\% | -0.28\% |
| EE | 2011 |  | 918.00 |  | 1,947.10 | 47.15\% | 4.36\% | 0.27\% |
| EE | 2012 |  | 850.00 |  | 2,110.00 | 40.28\% | 8.37\% | -14.56\% |
| EE | 2013 |  | 875.00 |  | 2,265.00 | 38.63\% | 7.35\% | -4.10\% |
| EE | 2015-2017 |  | 1,000.00 |  | 2,800.00 | 35.71\% | 23.62\% | -7.55\% |
| EDE | 2002 | \$ | 305.90 | \$ | 794.10 | 38.52\% |  |  |
| EDE | 2003 |  | 325.50 |  | 833.90 | 39.03\% | 5.01\% | 1.33\% |
| EDE | 2004 |  | 325.50 |  | 857.00 | 37.98\% | 2.77\% | -2.70\% |
| EDE | 2005 |  | 386.20 |  | 896.00 | 43.10\% | 4.55\% | 13.48\% |
| EDE | 2006 |  | 413.50 |  | 1,031.00 | 40.11\% | 15.07\% | -6.95\% |
| EDE | 2007 |  | 490.20 |  | 1,178.90 | 41.58\% | 14.35\% | 3.68\% |
| EDE | 2008 |  | 518.20 |  | 1,342.80 | 38.59\% | 13.90\% | -7.19\% |
| EDE | 2009 |  | 497.20 |  | 1,459.00 | 34.08\% | 8.65\% | -11.69\% |

DuPont Formula


DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue／Net Plant | Change in Net Plant | Change in Revenue／Net Plant |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| FE | 2007 |  | 12，802．00 |  | 15，383．00 | 83．22\％ | 4．88\％ | 6．13\％ |  |
| FE | 2008 |  | 13，627．00 |  | 17，723．00 | 76．89\％ | 15．21\％ | －7．61\％ |  |
| FE | 2009 |  | 12，712．00 |  | 19，164．00 | 66．33\％ | 8．13\％ | －13．73\％ |  |
| FE | 2010 |  | 13，339．00 |  | 19，788．00 | 67．41\％ | 3．26\％ | 1．62\％ |  |
| FE | 2011 |  | 16，258．00 |  | 30，337．00 | 53．59\％ | 53．31\％ | －20．50\％ |  |
| FE | 2012 |  | 16，100．00 |  | 31，225．00 | 51．56\％ | 2．93\％ | －3．79\％ |  |
| FE | 2013 |  | 16，400．00 |  | 32，275．00 | 50．81\％ | 3．36\％ | －1．45\％ |  |
| FE | 2015－2017 |  | 19，000．00 |  | 34，800．00 | 54．60\％ | 7．82\％ | 7．45\％ |  |
| GXP | 2002 | \＄ | 1，861．90 | \＄ | 2，604．10 | 71．50\％ |  |  |  |
| GXP | 2003 |  | 2，149．50 |  | 2，700．90 | 79．58\％ | 3．72\％ | 11．31\％ |  |
| GXP | 2004 |  | 2，464．00 |  | 2，734．50 | 90．11\％ | 1．24\％ | 13．22\％ |  |
| GXP | 2005 |  | 2，604．90 |  | 2，765．60 | 94．19\％ | 1．14\％ | 4．53\％ |  |
| GXP | 2006 |  | 2，675．30 |  | 3，066．20 | 87．25\％ | 10．87\％ | －7．37\％ |  |
| GXP | 2007 |  | 3，267．10 |  | 3，444．50 | 94．85\％ | 12．34\％ | 8．71\％ |  |
| GXP | 2008 |  | 1，670．10 |  | 6，081．30 | 27．46\％ | 76．55\％ | －71．05\％ |  |
| GXP | 2009 |  | 1，965．00 |  | 6，651．10 | 29．54\％ | 9．37\％ | 7．58\％ |  |
| GXP | 2010 |  | 2，255．50 |  | 6，892．30 | 32．72\％ | 3．63\％ | 10．77\％ |  |
| GXP | 2011 |  | 2，318．00 |  | 7，053．50 | 32．86\％ | 2．34\％ | 0．42\％ |  |
| GXP | 2012 |  | 2，300．00 |  | 7，365．00 | 31．23\％ | 4．42\％ | －4．97\％ |  |
| GXP | 2013 |  | 2，400．00 |  | 7，810．00 | 30．73\％ | 6．04\％ | －1．60\％ |  |
| GXP | 2015－2017 |  | 2，900．00 |  | 8，475．00 | 34．22\％ | 8．51\％ | 11．35\％ |  |
| HE | 2002 | \＄ | 1，653．70 | \＄ | 2，079．30 | 79．53\％ |  |  |  |
| HE | 2003 |  | 1，781．30 |  | 2，311．90 | 77．05\％ | 11．19\％ | －3．12\％ |  |
| HE | 2004 |  | 1，924．10 |  | 2，422．30 | 79．43\％ | 4．78\％ | 3．09\％ |  |
| HE | 2005 |  | 2，215．60 |  | 2，542．80 | 87．13\％ | 4．97\％ | 9．69\％ | 困吅汇国昌 |
| HE | 2006 |  | 2，460．90 |  | 2，647．50 | 92．95\％ | 4．12\％ | 6．68\％ | 國め号岛号号 |
| HE | 2007 |  | 2，536．40 |  | 2，743．40 | 92．45\％ | 3．62\％ | －0．53\％ |  |
| HE | 2008 |  | 3，218．90 |  | 2，907．40 | 110．71\％ | 5．98\％ | 19．75\％ | $\cdots \infty$ |
| HE | 2009 |  | 2，309．60 |  | 3，088．60 | 74．78\％ | 6．23\％ | －32．46\％ | －O H． |
| HE | 2010 |  | 2，665．00 |  | 3，165．90 | 84．18\％ | 2．50\％ | 12．57\％ |  |
| HE | 2011 |  | 3，242．30 |  | 3，334．50 | 97．23\％ | 5．33\％ | 15．51\％ |  |
| HE | 2012 |  | 3，400．00 |  | 3，505．00 | 97．00\％ | 5．11\％ | －0．24\％ | $\cdots$ |
| HE | 2013 |  | 3，450．00 |  | 3，750．00 | 92．00\％ | 6．99\％ | －5．16\％ | N |
| HE | 2015－2017 |  | 3，900．00 |  | 5，525．00 | 70．59\％ | 47．33\％ | －23．27\％ | $\stackrel{H}{\omega}$－$\quad$－ |
| IDA | 2002 | \＄ | 928.80 | \＄ | 1，906．50 | 48．72\％ |  |  | 㐌 |
| IDA | 2003 |  | 782.70 |  | 2，088．30 | 37．48\％ | 9．54\％ | －23．07\％ | 囫 |

DuPont Formula

| Ticker | Year | Revenue |  | Net Plant | Revenue／Net Plant | Change in Net Plant | Change in Revenue／Net Plant |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| IDA | 2004 | 844.50 |  | 2，209．50 | 38．22\％ | 5．80\％ | 1．98\％ |  |
| IDA | 2005 | 859.50 |  | 2，314．30 | 37．14\％ | 4．74\％ | －2．83\％ |  |
| IDA | 2006 | 926.30 |  | 2，419．10 | 38．29\％ | 4．53\％ | 3．10\％ |  |
| IDA | 2007 | 879.40 |  | 2，616．60 | 33．61\％ | 8．16\％ | －12．23\％ |  |
| IDA | 2008 | 960.40 |  | 2，758．20 | 34．82\％ | 5．41\％ | 3．60\％ |  |
| IDA | 2009 | 1，049．80 |  | 2，917．00 | 35．99\％ | 5．76\％ | 3．36\％ |  |
| IDA | 2010 | 1，036．00 |  | 3，161．40 | 32．77\％ | 8．38\％ | －8．94\％ |  |
| IDA | 2011 | 1，026．80 |  | 3，406．60 | 30．14\％ | 7．76\％ | －8．02\％ |  |
| IDA | 2012 | 1，100．00 |  | 3，680．00 | 29．89\％ | 8．03\％ | －0．83\％ |  |
| IDA | 2013 | 1，155．00 |  | 3，975．00 | 29．06\％ | 8．02\％ | －2．79\％ |  |
| IDA | 2015－2017 | 1，265．00 |  | 5，000．00 | 25．30\％ | 25．79\％ | －12．93\％ |  |
| TEG | 2002 \＄ | 2，674．90 | \＄ | 1，610．20 | 166．12\％ |  |  |  |
| TEG | 2003 | 4，321．30 |  | 1，828．70 | 236．30\％ | 13．57\％ | 42．25\％ |  |
| TEG | 2004 | 4，890．60 |  | 2，002．60 | 244．21\％ | 9．51\％ | 3．35\％ |  |
| TEG | 2005 | 6，962．70 |  | 2，049．40 | 339．74\％ | 2．34\％ | 39．12\％ |  |
| TEG | 2006 | 6，890．70 |  | 2，534．80 | 271．84\％ | 23．68\％ | －19．99\％ |  |
| TEG | 2007 | 10，292．00 |  | 4，463．80 | 230．57\％ | 76．10\％ | －15．18\％ |  |
| TEG | 2008 | 14，048．00 |  | 4，773．30 | 294．30\％ | 6．93\％ | 27．64\％ |  |
| TEG | 2009 | 7，499．80 |  | 4，945．10 | 151．66\％ | 3．60\％ | －48．47\％ |  |
| TEG | 2010 | 5，203．20 |  | 5，013．40 | 103．79\％ | 1．38\％ | －31．57\％ |  |
| TEG | 2011 | 4，708．70 |  | 5，199．10 | 90．57\％ | 3．70\％ | －12．74\％ |  |
| TEG | 2012 | 4，100．00 |  | 5，580．00 | 73．48\％ | 7．33\％ | －18．87\％ |  |
| TEG | 2013 | 4，500．00 |  | 6，140．00 | 73．29\％ | 10．04\％ | －0．25\％ |  |
| TEG | 2015－2017 | 5，100．00 |  | 7，425．00 | 68．69\％ | 20．93\％ | －6．28\％ |  |
| ITC | 2002 NA |  | NA | 7，425．00 |  |  |  |  |
| ITC | 2003 NA |  | NA |  |  |  |  |  |
| ITC | 2004 | 126.40 |  | 513.70 | 24．61\％ |  |  |  |
| ITC | 2005 | 205.30 |  | 603.60 | 34．01\％ | 17．50\％ | 38．23\％ | ．． 6 男男 |
| ITC | 2006 | 223.60 |  | 1，197．90 | 18．67\％ | 98．46\％ | －45．12\％ |  |
| ITC | 2007 | 426.20 |  | 1，960．40 | 21．74\％ | 63．65\％ | 16．47\％ | 边 z |
| ITC | 2008 | 617.90 |  | 2，304．40 | 26．81\％ | 17．55\％ | 23．34\％ | 응．${ }^{\text {¢ }}$ |
| ITC | 2009 | 621.00 |  | 2，542．10 | 24．43\％ | 10．32\％ | －8．90\％ | 思 |
| ITC | 2010 | 696.80 |  | 2，872．30 | 24．26\％ | 12．99\％ | －0．69\％ | N ${ }^{\circ}$ 界 ${ }^{\circ}$ |
| ITC | 2011 | 757.40 |  | 3，415．80 | 22．17\％ | 18．92\％ | －8．60\％ | $\stackrel{\text { 岕 }}{\text { ¢ }}$ |
| ITC | 2012 | 830.00 |  | 4，105．00 | 20．22\％ | 20．18\％ | －8．81\％ | 忽是 |
| ITC | 2013 | 920.00 |  | 4，780．00 | 19．25\％ | 16．44\％ | －4．81\％ | 蜀界 |

DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| ITC | 2015-2017 |  | 1,325.00 |  | 6,925.00 | 19.13\% | 44.87\% | -0.59\% |
| MGEE | 2002 | \$ | 347.10 | \$ | 451.50 | 76.88\% |  |  |
| MGEE | 2003 |  | 401.50 |  | 537.50 | 74.70\% | 19.05\% | -2.83\% |
| MGEE | 2004 |  | 424.90 |  | 607.40 | 69.95\% | 13.00\% | -6.35\% |
| MGEE | 2005 |  | 513.40 |  | 667.70 | 76.89\% | 9.93\% | 9.92\% |
| MGEE | 2006 |  | 507.50 |  | 728.40 | 69.67\% | 9.09\% | -9.39\% |
| MGEE | 2007 |  | 537.60 |  | 844.00 | 63.70\% | 15.87\% | -8.58\% |
| MGEE | 2008 |  | 596.00 |  | 901.20 | 66.13\% | 6.78\% | 3.83\% |
| MGEE | 2009 |  | 533.80 |  | 939.80 | 56.80\% | 4.28\% | -14.11\% |
| MGEE | 2010 |  | 532.60 |  | 968.00 | 55.02\% | 3.00\% | -3.13\% |
| MGEE | 2011 |  | 546.40 |  | 995.60 | 54.88\% | 2.85\% | -0.25\% |
| MGEE | 2012 |  | 540.00 |  | 1,060.00 | 50.94\% | 6.47\% | -7.18\% |
| MGEE | 2013 |  | 555.00 |  | 1,100.00 | 50.45\% | 3.77\% | -0.96\% |
| MGEE | 2015-2017 |  | 650.00 |  | 1,200.00 | 54.17\% | 9.09\% | 7.36\% |
| NEE | 2002 | \$ | 8,311.00 | \$ | 14,304.00 | 58.10\% |  |  |
| NEE | 2003 |  | 9,630.00 |  | 20,297.00 | 47.45\% | 41.90\% | -18.34\% |
| NEE | 2004 |  | 10,522.00 |  | 21,226.00 | 49.57\% | 4.58\% | 4.48\% |
| NEE | 2005 |  | 11,846.00 |  | 22,463.00 | 52.74\% | 5.83\% | 6.38\% |
| NEE | 2006 |  | 15,710.00 |  | 24,499.00 | 64.13\% | 9.06\% | 21.60\% |
| NEE | 2007 |  | 15,263.00 |  | 28,652.00 | 53.27\% | 16.95\% | -16.93\% |
| NEE | 2008 |  | 16,410.00 |  | 32,411.00 | 50.63\% | 13.12\% | -4.95\% |
| NEE | 2009 |  | 15,643.00 |  | 36,078.00 | 43.36\% | 11.31\% | -14.36\% |
| NEE | 2010 |  | 15,317.00 |  | 39,075.00 | 39.20\% | 8.31\% | -9.59\% |
| NEE | 2011 |  | 15,341.00 |  | 42,490.00 | 36.10\% | 8.74\% | -7.89\% |
| NEE | 2012 |  | 14,400.00 |  | 46,725.00 | 30.82\% | 9.97\% | -14.64\% |
| NEE | 2013 |  | 15,000.00 |  | 50,450.00 | 29.73\% | 7.97\% | -3.52\% |
| NEE | 2015-2017 |  | 16,800.00 |  | 60,600.00 | 27.72\% | 20.12\% | -6.76\% |
| NU | 2002 | \$ | 5,216.30 | \$ | 4,728.40 | 110.32\% |  |  |
| NU | 2003 |  | 6,069.20 |  | 5,429.90 | 111.77\% | 14.84\% | 1.32\% |
| NU | 2004 |  | 6,686.70 |  | 5,864.20 | 114.03\% | 8.00\% | 2.01\% |
| NU | 2005 |  | 5,507.30 |  | 6,417.20 | 85.82\% | 9.43\% | -24.74\% |
| NU | 2006 |  | 6,884.40 |  | 6,242.20 | 110.29\% | -2.73\% | 28.51\% |
| NU | 2007 |  | 5,822.20 |  | 7,229.90 | 80.53\% | 15.82\% | -26.98\% |
| NU | 2008 |  | 5,800.10 |  | 8,207.90 | 70.66\% | 13.53\% | -12.25\% |
| NU | 2009 |  | 5,439.40 |  | 8,840.00 | 61.53\% | 7.70\% | -12.92\% |
| NU | 2010 |  | 4,898.20 |  | 9,567.70 | 51.20\% | 8.23\% | -16.80\% |

[^23]DuPont Formula


DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| OGE | 2008 |  | 4,070.70 |  | 5,249.80 | 77.54\% | 23.63\% | -13.30\% |
| OGE | 2009 |  | 2,869.70 |  | 5,911.60 | 48.54\% | 12.61\% | -37.40\% |
| OGE | 2010 |  | 3,716.90 |  | 6,464.40 | 57.50\% | 9.35\% | 18.45\% |
| OGE | 2011 |  | 3,915.90 |  | 7,474.00 | 52.39\% | 15.62\% | -8.88\% |
| OGE | 2012 |  | 3,600.00 |  | 8,225.00 | 43.77\% | 10.05\% | -16.46\% |
| OGE | 2013 |  | 3,700.00 |  | 9,020.00 | 41.02\% | 9.67\% | -6.28\% |
| OGE | 2015-2017 |  | 4,300.00 |  | 9,275.00 | 46.36\% | 2.83\% | 13.02\% |
| OTTR | 2002 | \$ | 710.10 | \$ | 587.90 | 120.79\% |  |  |
| OTTR | 2003 |  | 753.20 |  | 633.30 | 118.93\% | 7.72\% | -1.53\% |
| OTTR | 2004 |  | 882.30 |  | 682.10 | 129.35\% | 7.71\% | 8.76\% |
| OTTR | 2005 |  | 1,046.40 |  | 697.10 | 150.11\% | 2.20\% | 16.05\% |
| OTTR | 2006 |  | 1,105.00 |  | 718.60 | 153.77\% | 3.08\% | 2.44\% |
| OTTR | 2007 |  | 1,238.90 |  | 854.00 | 145.07\% | 18.84\% | -5.66\% |
| OTTR | 2008 |  | 1,311.20 |  | 1,037.60 | 126.37\% | 21.50\% | -12.89\% |
| OTTR | 2009 |  | 1,039.50 |  | 1,098.60 | 94.62\% | 5.88\% | -25.12\% |
| OTTR | 2010 |  | 1,119.10 |  | 1,108.70 | 100.94\% | 0.92\% | 6.68\% |
| OTTR | 2011 |  | 1,077.90 |  | 1,077.50 | 100.04\% | -2.81\% | -0.89\% |
| OTTR | 2012 |  | 1,070.00 |  | 1,070.00 | 100.00\% | -0.70\% | -0.04\% |
| OTTR | 2013 |  | 1,125.00 |  | 1,125.00 | 100.00\% | 5.14\% | 0.00\% |
| OTTR | 2015-2017 |  | 1,450.00 |  | 1,325.00 | 109.43\% | 17.78\% | 9.43\% |
| POM | 2002 | \$ | 6,777.30 | \$ | 6,798.00 | 99.70\% |  |  |
| POM | 2003 |  | 7,271.30 |  | 6,964.90 | 104.40\% | 2.46\% | 4.72\% |
| POM | 2004 |  | 7,221.80 |  | 7,088.00 | 101.89\% | 1.77\% | -2.41\% |
| POM | 2005 |  | 8,065.50 |  | 7,312.00 | 110.30\% | 3.16\% | 8.26\% |
| POM | 2006 |  | 8,362.90 |  | 7,576.60 | 110.38\% | 3.62\% | 0.07\% |
| POM | 2007 |  | 9,366.40 |  | 7,876.70 | 118.91\% | 3.96\% | 7.73\% |
| POM | 2008 |  | 10,700.00 |  | 8,314.00 | 128.70\% | 5.55\% | 8.23\% |
| POM | 2009 |  | 9,259.00 |  | 8,863.00 | 104.47\% | 6.60\% | -18.83\% |
| POM | 2010 |  | 7,039.00 |  | 7,673.00 | 91.74\% | -13.43\% | -12.19\% |
| POM | 2011 |  | 5,920.00 |  | 8,220.00 | 72.02\% | 7.13\% | -21.49\% |
| POM | 2012 |  | 5,600.00 |  | 7,750.00 | 72.26\% | -5.72\% | 0.33\% |
| POM | 2013 |  | 6,200.00 |  | 7,800.00 | 79.49\% | 0.65\% | 10.00\% |
| POM | 2015-2017 |  | 7,000.00 |  | 8,100.00 | 86.42\% | 3.85\% | 8.72\% |
| PCG | 2002 | \$ | 12,495.00 | \$ | 16,928.00 | 73.81\% |  |  |
| PCG | 2003 |  | 10,435.00 |  | 18,107.00 | 57.63\% | 6.96\% | -21.92\% |
| PCG | 2004 |  | 11,080.00 |  | 18,989.00 | 58.35\% | 4.87\% | 1.25\% |

[^24]DuPont Formula

| Ticker | Year | Revenue |  | Net Plant | Revenue／Net Plant | Change in Net Plant | $\begin{gathered} \text { Change in } \\ \text { Revenue/Net Plant } \end{gathered}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| PCG | 2005 | 11，703．00 |  | 19，955．00 | 58．65\％ | 5．09\％ | 0．51\％ |  |
| PCG | 2006 | 12，539．00 |  | 21，785．00 | 57．56\％ | 9．17\％ | －1．86\％ |  |
| PCG | 2007 | 13，237．00 |  | 23，656．00 | 55．96\％ | 8．59\％ | －2．78\％ |  |
| PCG | 2008 | 14，628．00 |  | 26，261．00 | 55．70\％ | 11．01\％ | －0．45\％ |  |
| PCG | 2009 | 13，399．00 |  | 28，892．00 | 46．38\％ | 10．02\％ | －16．74\％ |  |
| PCG | 2010 | 13，841．00 |  | 31，449．00 | 44．01\％ | 8．85\％ | －5．10\％ |  |
| PCG | 2011 | 14，956．00 |  | 33，655．00 | 44．44\％ | 7．01\％ | 0．97\％ |  |
| PCG | 2012 | 15，100．00 |  | 36，025．00 | 41．92\％ | 7．04\％ | －5．68\％ |  |
| PCG | 2013 | 15，600．00 |  | 38，325．00 | 40．70\％ | 6．38\％ | －2．89\％ |  |
| PCG | 2015－2017 | 18，650．00 |  | 45，700．00 | 40．81\％ | 19．24\％ | 0．26\％ |  |
| PNW | 2002 \＄ | 2，637．30 | \＄ | 6，479．40 | 40．70\％ |  |  |  |
| PNW | 2003 | 2，817．90 |  | 7，480．10 | 37．67\％ | 15．44\％ | －7．45\％ |  |
| PNW | 2004 | 2，899．70 |  | 7，535．50 | 38．48\％ | 0．74\％ | 2．15\％ |  |
| PNW | 2005 | 2，988．00 |  | 7，577．10 | 39．43\％ | 0．55\％ | 2．48\％ |  |
| PNW | 2006 | 3，401．70 |  | 7，881．90 | 43．16\％ | 4．02\％ | 9．44\％ |  |
| PNW | 2007 | 3，523．60 |  | 8，436．40 | 41．77\％ | 7．04\％ | －3．22\％ |  |
| PNW | 2008 | 3，367．10 |  | 8，916．70 | 37．76\％ | 5．69\％ | －9．59\％ |  |
| PNW | 2009 | 3，297．10 |  | 9，257．80 | 35．61\％ | 3．83\％ | －5．69\％ |  |
| PNW | 2010 | 3，263．60 |  | 9，578．80 | 34．07\％ | 3．47\％ | －4．33\％ |  |
| PNW | 2011 | 3，241．40 |  | 9，962．30 | 32．54\％ | 4．00\％ | －4．50\％ |  |
| PNW | 2012 | 3，300．00 |  | 10，360．00 | 31．85\％ | 3．99\％ | －2．10\％ |  |
| PNW | 2013 | 3，425．00 |  | 10，810．00 | 31．68\％ | 4．34\％ | －0．53\％ |  |
| PNW | 2015－2017 | 3，800．00 |  | 12，675．00 | 29．98\％ | 17．25\％ | －5．38\％ |  |
| PNM | 2002 \＄ | 1，169．00 | \＄ | 1，867．30 | 62．60\％ |  |  |  |
| PNM | 2003 | 1，455．70 |  | 2，194．40 | 66．34\％ | 17．52\％ | 5．96\％ |  |
| PNM | 2004 | 1，604．80 |  | 2，324．60 | 69．04\％ | 5．93\％ | 4．07\％ | 봉애ㅅㅜㅐ |
| PNM | 2005 | 2，076．80 |  | 2，984．10 | 69．60\％ | 28．37\％ | 0．81\％ |  |
| PNM | 2006 | 2，471．70 |  | 3，761．90 | 65．70\％ | 26．06\％ | －5．59\％ | －¢ MفH |
| PNM | 2007 | 1，914．00 |  | 2，935．40 | 65．20\％ | －21．97\％ | －0．76\％ |  |
| PNM | 2008 | 1，959．50 |  | 3，192．00 | 61．39\％ | 8．74\％ | －5．85\％ |  |
| PNM | 2009 | 1，647．70 |  | 3，332．40 | 49．44\％ | 4．40\％ | －19．45\％ |  |
| PNM | 2010 | 1，673．50 |  | 3，444．40 | 48．59\％ | 3．36\％ | －1．74\％ | No，氙 |
| PNM | 2011 | 1，700．60 |  | 3，627．10 | 46．89\％ | 5．30\％ | －3．50\％ |  |
| PNM | 2012 | 1，350．00 |  | 3，810．00 | 35．43\％ | 5．04\％ | －24．43\％ | $\stackrel{\text { H }}{\omega}$ |
| PNM | 2013 | 1，385．00 |  | 4，000．00 | 34．63\％ | 4．99\％ | －2．28\％ | 伆蜀 |
| PNM | 2015－2017 | 1，600．00 |  | 4，630．00 | 34．56\％ | 15．75\％ | －0．20\％ | 界 |

DuPont Formula

| Ticker | Year |  | Revenue |  | Net Plant | Revenue／Net Plant | Change in Net Plant | Change in Revenue／Net Plant |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| POR | 2002 | NA |  | NA |  |  |  |  |  |
| POR | 2003 | NA |  | NA |  |  |  |  |  |
| POR | 2004 |  | 1，454．00 |  | 2，275．00 | 63．91\％ |  |  |  |
| POR | 2005 |  | 1，446．00 |  | 2，436．00 | 59．36\％ | 7．08\％ | －7．12\％ |  |
| POR | 2006 |  | 1，520．00 |  | 2，718．00 | 55．92\％ | 11．58\％ | －5．79\％ |  |
| POR | 2007 |  | 1，743．00 |  | 3，066．00 | 56．85\％ | 12．80\％ | 1．66\％ |  |
| POR | 2008 |  | 1，745．00 |  | 3，301．00 | 52．86\％ | 7．66\％ | －7．01\％ |  |
| POR | 2009 |  | 1，804．00 |  | 3，858．00 | 46．76\％ | 16．87\％ | －11．54\％ |  |
| POR | 2010 |  | 1，783．00 |  | 4，133．00 | 43．14\％ | 7．13\％ | －7．74\％ |  |
| POR | 2011 |  | 1，813．00 |  | 4，285．00 | 42．31\％ | 3．68\％ | －1．92\％ |  |
| POR | 2012 |  | 1，825．00 |  | 4，380．00 | 41．67\％ | 2．22\％ | －1．52\％ |  |
| POR | 2013 |  | 1，875．00 |  | 4，485．00 | 41．81\％ | 2．40\％ | 0．33\％ |  |
| POR | 2015－2017 |  | 2，100．00 |  | 4，575．00 | 45．90\％ | 2．01\％ | 9．80\％ |  |
| PPL | 2002 | \＄ | 5，429．00 | \＄ | 9，566．00 | 56．75\％ |  |  |  |
| PPL | 2003 |  | 5，587．00 |  | 10，446．00 | 53．48\％ | 9．20\％ | －5．76\％ |  |
| PPL | 2004 |  | 5，812．00 |  | 11，209．00 | 51．85\％ | 7．30\％ | －3．05\％ |  |
| PPL | 2005 |  | 6，219．00 |  | 10，916．00 | 56．97\％ | －2．61\％ | 9．87\％ |  |
| PPL | 2006 |  | 6，899．00 |  | 12，069．00 | 57．16\％ | 10．56\％ | 0．34\％ |  |
| PPL | 2007 |  | 6，498．00 |  | 12，605．00 | 51．55\％ | 4．44\％ | －9．82\％ |  |
| PPL | 2008 |  | 8，044．00 |  | 12，416．00 | 64．79\％ | －1．50\％ | 25．68\％ |  |
| PPL | 2009 |  | 7，556．00 |  | 13，174．00 | 57．36\％ | 6．11\％ | －11．47\％ |  |
| PPL | 2010 |  | 8，521．00 |  | 20，858．00 | 40．85\％ | 58．33\％ | －28．77\％ |  |
| PPL | 2011 |  | 12，737．00 |  | 27，266．00 | 46．71\％ | 30．72\％ | 14．35\％ |  |
| PPL | 2012 |  | 11，800．00 |  | 29，475．00 | 40．03\％ | 8．10\％ | －14．30\％ |  |
| PPL | 2013 |  | 12，250．00 |  | 32，325．00 | 37．90\％ | 9．67\％ | －5．34\％ |  |
| PPL | 2015－2017 |  | 14，000．00 |  | 38，200．00 | 36．65\％ | 18．17\％ | －3．29\％ |  |
| PEG | 2002 | \＄ | 8，390．00 | \＄ | 11，449．00 | 73．28\％ |  |  | 团团最氙易氙 |
| PEG | 2003 |  | 11，116．00 |  | 12，422．00 | 89．49\％ | 8．50\％ | 22．11\％ |  |
| PEG | 2004 |  | 10，996．00 |  | 13，750．00 | 79．97\％ | 10．69\％ | －10．63\％ | ○日可回号 |
| PEG | 2005 |  | 12，430．00 |  | 13，336．00 | 93．21\％ | －3．01\％ | 16．55\％ | ャ O |
| PEG | 2006 |  | 12，164．00 |  | 13，002．00 | 93．55\％ | －2．50\％ | 0．37\％ |  |
| PEG | 2007 |  | 12，853．00 |  | 13，275．00 | 96．82\％ | 2．10\％ | 3．49\％ | －${ }^{\text {c }}$ |
| PEG | 2008 |  | 14，139．00 |  | 14，433．00 | 97．96\％ | 8．72\％ | 1．18\％ | N 気 |
| PEG | 2009 |  | 12，431．00 |  | 15，440．00 | 80．51\％ | 6．98\％ | －17．81\％ | $\stackrel{\sim}{\omega}$ H ${ }_{\text {－}}^{0}$ |
| PEG | 2010 |  | 11，793．00 |  | 16，390．00 | 71．95\％ | 6．15\％ | －10．63\％ | 囫员 |
| PEG | 2011 |  | 11，343．00 |  | 17，849．00 | 63．55\％ | 8．90\％ | －11．68\％ | 号 |

DuPont Formula


DuPont Formula


DuPont Formula

| Ticker | Year | Revenue | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| UNS | 2006 | 1,316.90 | 2,259.60 | 58.28\% | 4.06\% | 2.93\% |
| UNS | 2007 | 1,381.40 | 2,407.30 | 57.38\% | 6.54\% | -1.54\% |
| UNS | 2008 | 1,397.50 | 2,617.70 | 53.39\% | 8.74\% | -6.97\% |
| UNS | 2009 | 1,394.40 | 2,785.70 | 50.06\% | 6.42\% | -6.24\% |
| UNS | 2010 | 1,453.70 | 2,961.50 | 49.09\% | 6.31\% | -1.94\% |
| UNS | 2011 | 1,509.50 | 3,182.30 | 47.43\% | 7.46\% | -3.37\% |
| UNS | 2012 | 1,450.00 | 3,405.00 | 42.58\% | 7.00\% | -10.22\% |
| UNS | 2013 | 1,500.00 | 3,645.00 | 41.15\% | 7.05\% | -3.36\% |
| UNS | 2015-2017 | 1,715.00 | 4,465.00 | 38.41\% | 22.50\% | -6.66\% |

DuPont Formula


DuPont Formula

| Ticker | Year | Revenue |  | Net Plant | Revenue/Net Plant | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| WEC | 2012 | 4,300.00 |  | 10,555.00 | 40.74\% | 3.89\% | -7.74\% |
| WEC | 2013 | 4,550.00 |  | 10,870.00 | 41.86\% | 2.98\% | 2.75\% |
| WEC | 2015-2017 | 5,200.00 |  | 11,525.00 | 45.12\% | 6.03\% | 7.79\% |
| XEL | 2002 \$ | 9,524.40 | \$ | 18,816.00 | 50.62\% |  |  |
| XEL | 2003 | 7,937.50 |  | 13,667.00 | 58.08\% | -27.37\% | 14.74\% |
| XEL | 2004 | 8,345.30 |  | 14,096.00 | 59.20\% | 3.14\% | 1.94\% |
| XEL | 2005 | 9,625.50 |  | 14,696.00 | 65.50\% | 4.26\% | 10.63\% |
| XEL | 2006 | 9,840.30 |  | 15,549.00 | 63.29\% | 5.80\% | -3.38\% |
| XEL | 2007 | 10,034.00 |  | 16,676.00 | 60.17\% | 7.25\% | -4.92\% |
| XEL | 2008 | 11,203.00 |  | 17,689.00 | 63.33\% | 6.07\% | 5.26\% |
| XEL | 2009 | 9,644.30 |  | 18,508.00 | 52.11\% | 4.63\% | -17.72\% |
| XEL | 2010 | 10,311.00 |  | 20,663.00 | 49.90\% | 11.64\% | -4.24\% |
| XEL | 2011 | 10,655.00 |  | 22,353.00 | 47.67\% | 8.18\% | -4.48\% |
| XEL | 2012 | 10,000.00 |  | 23,950.00 | 41.75\% | 7.14\% | -12.41\% |
| XEL | 2013 | 10,500.00 |  | 26,025.00 | 40.35\% | 8.66\% | -3.37\% |
| XEL | 2015-2017 | 12,150.00 |  | 29,600.00 | 41.05\% | 13.74\% | 1.74\% |


| Average Revenue/Net <br> Plant | Average Change in <br> Net Plant | Cumulative Change in <br> Net Plant |  |
| ---: | :---: | :---: | :---: |
| 2003 | $74.74 \%$ | $13.13 \%$ | $13.13 \%$ |
| 2004 | $74.67 \%$ | $3.56 \%$ | $17.16 \%$ |
| 2005 | $82.66 \%$ | $4.26 \%$ | $22.14 \%$ |
| 2006 | $75.10 \%$ | $9.03 \%$ | $33.17 \%$ |
| 2007 | $72.25 \%$ | $10.52 \%$ | $47.19 \%$ |
| 2008 | $70.75 \%$ | $11.69 \%$ | $64.39 \%$ |
| 2009 | $56.33 \%$ | $7.67 \%$ | $76.99 \%$ |
| 2010 | $53.48 \%$ | $9.27 \%$ | $93.40 \%$ |
| 2011 | $50.97 \%$ | $8.42 \%$ | $109.68 \%$ |
| 2012 | $45.82 \%$ | $8.71 \%$ | $127.95 \%$ |
| 2013 | $45.81 \%$ | $5.51 \%$ | $140.51 \%$ |
| $2015-2017$ | $47.23 \%$ | $14.07 \%$ | $174.35 \%$ |

DOCKET NO. 130040-EI EXHIBIT NO. (RBH-1)

DuPont Formula - Regression Analysis

| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| ALE | 2005 | -2.57\% | 0.73\% |
| ALE | 2006 | 7.11\% | -2.88\% |
| ALE | 2007 | 19.85\% | -8.44\% |
| ALE | 2008 | 25.60\% | -24.23\% |
| ALE | 2009 | 16.97\% | -18.98\% |
| ALE | 2010 | 11.27\% | 7.38\% |
| ALE | 2011 | 9.81\% | -6.80\% |
| ALE | 2012 | 17.26\% | -12.26\% |
| ALE | 2013 | 8.17\% | -2.71\% |
| ALE | 2015-2017 | 12.33\% | 4.53\% |
| LNT | 2003 | 18.86\% | 0.88\% |
| LNT | 2004 | 19.22\% | -20.67\% |
| LNT | 2005 | -7.92\% | 20.38\% |
| LNT | 2006 | 1.62\% | 0.80\% |
| LNT | 2007 | -5.36\% | 8.12\% |
| LNT | 2008 | 14.39\% | -6.38\% |
| LNT | 2009 | 15.87\% | -19.53\% |
| LNT | 2010 | 8.51\% | -8.29\% |
| LNT | 2011 | 4.55\% | 2.62\% |
| LNT | 2012 | 6.58\% | -20.64\% |
| LNT | 2013 | 4.00\% | 2.36\% |
| LNT | 2015-2017 | 8.97\% | 25.13\% |
| AEE | 2003 | 22.47\% | -2.36\% |
| AEE | 2004 | 21.80\% | -7.76\% |
| AEE | 2005 | 2.07\% | 28.73\% |
| AEE | 2006 | 5.26\% | -3.60\% |
| AEE | 2007 | 5.48\% | 3.98\% |
| AEE | 2008 | 9.94\% | -5.51\% |
| AEE | 2009 | 6.30\% | -14.91\% |
| AEE | 2010 | 1.38\% | 6.26\% |
| AEE | 2011 | 1.53\% | -2.89\% |
| AEE | 2012 | 2.89\% | -11.59\% |
| AEE | 2013 | 2.41\% | -0.22\% |
| AEE | 2015-2017 | 7.85\% | 1.99\% |
| AEP | 2003 | 1.59\% | -1.63\% |
| AEP | 2004 | 3.50\% | -6.63\% |
| AEP | 2005 | 6.50\% | -19.11\% |
| AEP | 2006 | 10.28\% | -5.50\% |
| AEP | 2007 | 11.53\% | -4.96\% |
| AEP | 2008 | 10.44\% | -2.28\% |
| AEP | 2009 | 4.11\% | -10.28\% |
| AEP | 2010 | 3.87\% | 2.97\% |
| AEP | 2011 | 3.64\% | 1.10\% |
| AEP | 2012 | 3.93\% | -6.43\% |
| AEP | 2013 | 4.68\% | 0.07\% |
| AEP | 2015-2017 | 12.62\% | 2.92\% |
| AVA | 2003 | 24.36\% | -7.86\% |
| AVA | 2004 | 0.59\% | 1.91\% |
| AVA | 2005 | 8.71\% | 8.61\% |
| AVA | 2006 | 4.17\% | 6.36\% |
| AVA | 2007 | 6.15\% | -11.33\% |
| AVA | 2008 | 5.99\% | 11.58\% |
| AVA | 2009 | 4.61\% | -13.76\% |
| AVA | 2010 | 4.11\% | -1.02\% |
| AVA | 2011 | 5.40\% | -1.41\% |
| AVA | 2012 | 4.87\% | -8.75\% |
| AVA | 2013 | 4.33\% | -1.06\% |
| AVA | 2015-2017 | 11.02\% | 6.96\% |
| BKH | 2003 | -2.30\% | 174.31\% |
| BKH | 2004 | 0.23\% | -1.49\% |
| BKH | 2005 | -0.71\% | 24.95\% |
| BKH | 2006 | 14.70\% | -58.85\% |

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| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| $\overline{\text { BKH }}$ | 2007 | 10.76\% | -4.35\% |
| BKH | 2008 | 10.90\% | 30.33\% |
| BKH | 2009 | 6.85\% | 18.14\% |
| BKH | 2010 | 15.49\% | -10.84\% |
| BKH | 2011 | 11.79\% | -12.95\% |
| BKH | 2012 | 6.65\% | -10.45\% |
| BKH | 2013 | 9.75\% | -4.01\% |
| BKH | 2015-2017 | 18.68\% | -2.58\% |
| CNP | 2003 | 3.53\% | 18.99\% |
| CNP | 2004 | -30.69\% | 25.81\% |
| CNP | 2005 | 3.73\% | 10.13\% |
| CNP | 2006 | 8.38\% | -11.56\% |
| CNP | 2007 | 5.82\% | -2.42\% |
| CNP | 2008 | 5.71\% | 11.30\% |
| CNP | 2009 | 4.78\% | -30.19\% |
| CNP | 2010 | 8.75\% | -2.45\% |
| CNP | 2011 | 5.71\% | -9.01\% |
| CNP | 2012 | 6.43\% | -19.39\% |
| CNP | 2013 | 0.76\% | 5.41\% |
| CNP | 2015-2017 | -3.01\% | 16.49\% |
| CHG | 2003 | 17.58\% | -1.36\% |
| CHG | 2004 | 5.31\% | -6.84\% |
| CHG | 2005 | 4.62\% | 17.45\% |
| CHG | 2006 | 6.11\% | -3.73\% |
| CHG | 2007 | 7.76\% | 11.80\% |
| CHG | 2008 | 6.13\% | 4.94\% |
| CHG | 2009 | 7.03\% | -34.70\% |
| CHG | 2010 | 4.18\% | 0.18\% |
| CHG | 2011 | 7.27\% | -5.51\% |
| CHG | 2012 | 4.30\% | -8.55\% |
| CHG | 2013 | 4.24\% | 3.08\% |
| CHG | 2015-2017 | 5.69\% | 15.22\% |
| CNL | 2003 | -9.52\% | 34.03\% |
| CNL | 2004 | -25.20\% | 14.00\% |
| CNL | 2005 | 12.14\% | 10.03\% |
| CNL | 2006 | 9.78\% | -0.94\% |
| CNL | 2007 | 32.26\% | -22.13\% |
| CNL | 2008 | 18.51\% | -11.56\% |
| CNL | 2009 | 9.86\% | -28.05\% |
| CNL | 2010 | 23.91\% | 8.58\% |
| CNL | 2011 | 3.94\% | -6.42\% |
| CNL | 2012 | 2.98\% | -17.43\% |
| CNL | 2013 | -1.17\% | 6.51\% |
| CNL | 2015-2017 | -5.77\% | 32.66\% |
| CMS | 2003 | 32.67\% | -52.17\% |
| CMS | 2004 | 24.37\% | -20.19\% |
| CMS | 2005 | -9.16\% | 26.50\% |
| CMS | 2006 | 1.67\% | 6.52\% |
| CMS | 2007 | 9.43\% | -12.52\% |
| CMS | 2008 | 5.29\% | -0.63\% |
| CMS | 2009 | 5.35\% | -13.65\% |
| CMS | 2010 | 4.00\% | -0.33\% |
| CMS | 2011 | 5.60\% | -4.26\% |
| CMS | 2012 | 8.15\% | -11.85\% |
| CMS | 2013 | 6.74\% | -4.05\% |
| CMS | 2015-2017 | 18.13\% | -4.01\% |
| ED | 2003 | 14.22\% | 1.43\% |
| ED | 2004 | 5.79\% | -6.13\% |
| ED | 2005 | 6.25\% | 12.76\% |
| ED | 2006 | 7.79\% | -3.68\% |
| ED | 2007 | 7.96\% | 0.13\% |
| ED | 2008 | 4.82\% | -1.23\% |

DuPont Formula - Regression Analysis

| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| ED | 2009 | 7.62\% | -10.85\% |
| ED | 2010 | 6.23\% | -3.75\% |
| ED | 2011 | 5.15\% | -7.66\% |
| ED | 2012 | 5.01\% | -10.94\% |
| ED | 2013 | 4.36\% | -1.01\% |
| ED | 2015-2017 | 9.82\% | 0.53\% |
| D | 2003 | 27.61\% | -7.37\% |
| D | 2004 | 3.35\% | 11.93\% |
| D | 2005 | 8.32\% | 19.20\% |
| D | 2006 | 1.53\% | -10.02\% |
| D | 2007 | -27.33\% | 30.86\% |
| D | 2008 | 9.00\% | -4.65\% |
| D | 2009 | 9.96\% | -15.53\% |
| D | 2010 | 4.38\% | -3.78\% |
| D | 2011 | 11.07\% | -14.81\% |
| D | 2012 | 9.54\% | -16.19\% |
| D | 2013 | 10.08\% | -5.71\% |
| D | 2015-2017 | 21.59\% | -7.55\% |
| DTE | 2003 | 5.21\% | -0.84\% |
| DTE | 2004 | 1.62\% | -0.57\% |
| DTE | 2005 | 3.23\% | 22.85\% |
| DTE | 2006 | 5.73\% | -5.42\% |
| DTE | 2007 | -0.38\% | -1.41\% |
| DTE | 2008 | 7.21\% | -1.80\% |
| DTE | 2009 | 1.64\% | -15.48\% |
| DTE | 2010 | 4.51\% | 2.17\% |
| DTE | 2011 | 5.80\% | -1.73\% |
| DTE | 2012 | 7.85\% | -10.37\% |
| DTE | 2013 | 5.06\% | -0.39\% |
| DTE | 2015-2017 | 12.36\% | 2.35\% |
| DUK | 2007 | -24.94\% | 59.77\% |
| DUK | 2008 | 9.41\% | -5.10\% |
| DUK | 2009 | 11.50\% | -13.55\% |
| DUK | 2010 | 6.31\% | 5.45\% |
| DUK | 2011 | 5.74\% | -3.73\% |
| DUK | 2012 | 61.27\% | -15.07\% |
| DUK | 2013 | 4.58\% | 22.53\% |
| DUK | 2015-2017 | 14.52\% | -0.70\% |
| EIX | 2003 | 52.63\% | -30.79\% |
| EIX | 2004 | 7.05\% | -21.49\% |
| EIX | 2005 | 7.38\% | 8.22\% |
| EIX | 2006 | 9.98\% | -3.17\% |
| EIX | 2007 | 9.36\% | -5.00\% |
| EIX | 2008 | 9.00\% | -1.27\% |
| EIX | 2009 | 15.80\% | -24.28\% |
| EIX | 2010 | 12.80\% | -11.10\% |
| EIX | 2011 | 29.61\% | -20.67\% |
| EIX | 2012 | -4.88\% | -1.14\% |
| EIX | 2013 | 7.69\% | -1.73\% |
| EIX | 2015-2017 | 17.63\% | 3.76\% |
| EE | 2003 | -3.49\% | -0.24\% |
| EE | 2004 | -1.16\% | 7.90\% |
| EE | 2005 | 0.68\% | 12.68\% |
| EE | 2006 | 3.14\% | -1.52\% |
| EE | 2007 | 8.89\% | -1.31\% |
| EE | 2008 | 10.00\% | 7.65\% |
| EE | 2009 | 10.05\% | -27.58\% |
| EE | 2010 | 6.25\% | -0.28\% |
| EE | 2011 | 4.36\% | 0.27\% |
| EE | 2012 | 8.37\% | -14.56\% |
| EE | 2013 | 7.35\% | -4.10\% |
| EE | 2015-2017 | 23.62\% | -7.55\% |

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DuPont Formula - Regression Analysis

| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| EDE | 2003 | 5.01\% | 1.33\% |
| EDE | 2004 | 2.77\% | -2.70\% |
| EDE | 2005 | 4.55\% | 13.48\% |
| EDE | 2006 | 15.07\% | -6.95\% |
| EDE | 2007 | 14.35\% | 3.68\% |
| EDE | 2008 | 13.90\% | -7.19\% |
| EDE | 2009 | 8.65\% | -11.69\% |
| EDE | 2010 | 4.12\% | 4.56\% |
| EDE | 2011 | 2.94\% | 3.54\% |
| EDE | 2012 | 5.20\% | -7.73\% |
| EDE | 2013 | 5.47\% | -0.11\% |
| EDE | 2015-2017 | 10.95\% | 8.46\% |
| ETR | 2003 | 6.42\% | 4.04\% |
| ETR | 2004 | 2.17\% | 7.77\% |
| ETR | 2005 | 2.68\% | -2.78\% |
| ETR | 2006 | 1.26\% | 6.83\% |
| ETR | 2007 | 7.90\% | -2.64\% |
| ETR | 2008 | 6.94\% | 6.62\% |
| ETR | 2009 | 4.28\% | -21.30\% |
| ETR | 2010 | 1.96\% | 4.85\% |
| ETR | 2011 | 7.38\% | -8.98\% |
| ETR | 2012 | 2.89\% | -11.29\% |
| ETR | 2013 | 1.14\% | -0.16\% |
| ETR | 2015-2017 | 2.06\% | 8.86\% |
| EXC | 2003 | 20.40\% | -12.19\% |
| EXC | 2004 | 4.13\% | -11.84\% |
| EXC | 2005 | 2.32\% | 3.40\% |
| EXC | 2006 | 3.61\% | -1.61\% |
| EXC | 2007 | 6.05\% | 13.94\% |
| EXC | 2008 | 6.87\% | -6.71\% |
| EXC | 2009 | 5.92\% | -13.30\% |
| EXC | 2010 | 9.51\% | -1.69\% |
| EXC | 2011 | 8.78\% | -6.69\% |
| EXC | 2012 | 35.55\% | -9.56\% |
| EXC | 2013 | 4.70\% | 4.16\% |
| EXC | 2015-2017 | 12.49\% | -0.92\% |
| FE | 2003 | 4.65\% | -3.22\% |
| FE | 2004 | 1.58\% | -0.38\% |
| FE | 2005 | 3.86\% | -7.30\% |
| FE | 2006 | 4.78\% | -8.45\% |
| FE | 2007 | 4.88\% | 6.13\% |
| FE | 2008 | 15.21\% | -7.61\% |
| FE | 2009 | 8.13\% | -13.73\% |
| FE | 2010 | 3.26\% | 1.62\% |
| FE | 2011 | 53.31\% | -20.50\% |
| FE | 2012 | 2.93\% | -3.79\% |
| FE | 2013 | 3.36\% | -1.45\% |
| FE | 2015-2017 | 7.82\% | 7.45\% |
| GXP | 2003 | 3.72\% | 11.31\% |
| GXP | 2004 | 1.24\% | 13.22\% |
| GXP | 2005 | 1.14\% | 4.53\% |
| GXP | 2006 | 10.87\% | -7.37\% |
| GXP | 2007 | 12.34\% | 8.71\% |
| GXP | 2008 | 76.55\% | -71.05\% |
| GXP | 2009 | 9.37\% | 7.58\% |
| GXP | 2010 | 3.63\% | 10.77\% |
| GXP | 2011 | 2.34\% | 0.42\% |
| GXP | 2012 | 4.42\% | -4.97\% |
| GXP | 2013 | 6.04\% | -1.60\% |
| GXP | 2015-2017 | 8.51\% | 11.35\% |
| HE | 2003 | 11.19\% | -3.12\% |
| HE | 2004 | 4.78\% | 3.09\% |

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DuPont Formula - Regression Analysis

| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| HE | 2005 | 4.97\% | 9.69\% |
| HE | 2006 | 4.12\% | 6.68\% |
| HE | 2007 | 3.62\% | -0.53\% |
| HE | 2008 | 5.98\% | 19.75\% |
| HE | 2009 | 6.23\% | -32.46\% |
| HE | 2010 | 2.50\% | 12.57\% |
| HE | 2011 | 5.33\% | 15.51\% |
| HE | 2012 | 5.11\% | -0.24\% |
| HE | 2013 | 6.99\% | -5.16\% |
| HE | 2015-2017 | 47.33\% | -23.27\% |
| IDA | 2003 | 9.54\% | -23.07\% |
| IDA | 2004 | 5.80\% | 1.98\% |
| IDA | 2005 | 4.74\% | -2.83\% |
| IDA | 2006 | 4.53\% | 3.10\% |
| IDA | 2007 | 8.16\% | -12.23\% |
| IDA | 2008 | 5.41\% | 3.60\% |
| IDA | 2009 | 5.76\% | 3.36\% |
| IDA | 2010 | 8.38\% | -8.94\% |
| IDA | 2011 | 7.76\% | -8.02\% |
| IDA | 2012 | 8.03\% | -0.83\% |
| IDA | 2013 | 8.02\% | -2.79\% |
| IDA | 2015-2017 | 25.79\% | -12.93\% |
| TEG | 2003 | 13.57\% | 42.25\% |
| TEG | 2004 | 9.51\% | 3.35\% |
| TEG | 2005 | 2.34\% | 39.12\% |
| TEG | 2006 | 23.68\% | -19.99\% |
| TEG | 2007 | 76.10\% | -15.18\% |
| TEG | 2008 | 6.93\% | 27.64\% |
| TEG | 2009 | 3.60\% | -48.47\% |
| TEG | 2010 | 1.38\% | -31.57\% |
| TEG | 2011 | 3.70\% | -12.74\% |
| TEG | 2012 | 7.33\% | -18.87\% |
| TEG | 2013 | 10.04\% | -0.25\% |
| TEG | 2015-2017 | 20.93\% | -6.28\% |
| ITC | 2005 | 17.50\% | 38.23\% |
| ITC | 2006 | 98.46\% | -45.12\% |
| ITC | 2007 | 63.65\% | 16.47\% |
| ITC | 2008 | 17.55\% | 23.34\% |
| ITC | 2009 | 10.32\% | -8.90\% |
| ITC | 2010 | 12.99\% | -0.69\% |
| ITC | 2011 | 18.92\% | -8.60\% |
| ITC | 2012 | 20.18\% | -8.81\% |
| ITC | 2013 | 16.44\% | -4.81\% |
| ITC | 2015-2017 | 44.87\% | -0.59\% |
| MGEE | 2003 | 19.05\% | -2.83\% |
| MGEE | 2004 | 13.00\% | -6.35\% |
| MGEE | 2005 | 9.93\% | 9.92\% |
| MGEE | 2006 | 9.09\% | -9.39\% |
| MGEE | 2007 | 15.87\% | -8.58\% |
| MGEE | 2008 | 6.78\% | 3.83\% |
| MGEE | 2009 | 4.28\% | -14.11\% |
| MGEE | 2010 | 3.00\% | -3.13\% |
| MGEE | 2011 | 2.85\% | -0.25\% |
| MGEE | 2012 | 6.47\% | -7.18\% |
| MGEE | 2013 | 3.77\% | -0.96\% |
| MGEE | 2015-2017 | 9.09\% | 7.36\% |
| NEE | 2003 | 41.90\% | -18.34\% |
| NEE | 2004 | 4.58\% | 4.48\% |
| NEE | 2005 | 5.83\% | 6.38\% |
| NEE | 2006 | 9.06\% | 21.60\% |
| NEE | 2007 | 16.95\% | -16.93\% |
| NEE | 2008 | 13.12\% | -4.95\% |

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| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| NEE | 2009 | 11.31\% | -14.36\% |
| NEE | 2010 | 8.31\% | -9.59\% |
| NEE | 2011 | 8.74\% | -7.89\% |
| NEE | 2012 | 9.97\% | -14.64\% |
| NEE | 2013 | 7.97\% | -3.52\% |
| NEE | 2015-2017 | 20.12\% | -6.76\% |
| NU | 2003 | 14.84\% | 1.32\% |
| NU | 2004 | 8.00\% | 2.01\% |
| NU | 2005 | 9.43\% | -24.74\% |
| NU | 2006 | -2.73\% | 28.51\% |
| NU | 2007 | 15.82\% | -26.98\% |
| NU | 2008 | 13.53\% | -12.25\% |
| NU | 2009 | 7.70\% | -12.92\% |
| NU | 2010 | 8.23\% | -16.80\% |
| NU | 2011 | 8.73\% | -16.15\% |
| NU | 2012 | 56.93\% | -10.10\% |
| NU | 2013 | 3.83\% | 13.89\% |
| NU | 2015-2017 | 13.27\% | -1.65\% |
| NWE | 2006 | 5.87\% | -8.23\% |
| NWE | 2007 | 18.70\% | -10.74\% |
| NWE | 2008 | 3.89\% | 1.13\% |
| NWE | 2009 | 6.76\% | -15.17\% |
| NWE | 2010 | 7.84\% | -9.80\% |
| NWE | 2011 | 4.50\% | -3.74\% |
| NWE | 2012 | 9.79\% | -12.37\% |
| NWE | 2013 | 5.76\% | 1.15\% |
| NWE | 2015-2017 | 16.26\% | 8.02\% |
| NVE | 2003 | 7.75\% | -13.48\% |
| NVE | 2004 | 6.12\% | -4.60\% |
| NVE | 2005 | 9.55\% | -2.05\% |
| NVE | 2006 | 12.77\% | -1.79\% |
| NVE | 2007 | 15.18\% | -6.84\% |
| NVE | 2008 | 18.53\% | -17.34\% |
| NVE | 2009 | 4.28\% | -2.53\% |
| NVE | 2010 | 3.05\% | -11.23\% |
| NVE | 2011 | 3.33\% | -13.16\% |
| NVE | 2012 | 1.17\% | 0.75\% |
| NVE | 2013 | 1.07\% | 0.59\% |
| NVE | 2015-2017 | 0.16\% | 6.39\% |
| OGE | 2003 | 3.28\% | 21.00\% |
| OGE | 2004 | 8.20\% | 20.48\% |
| OGE | 2005 | -0.38\% | 21.20\% |
| OGE | 2006 | 8.41\% | -37.88\% |
| OGE | 2007 | 9.79\% | -13.65\% |
| OGE | 2008 | 23.63\% | -13.30\% |
| OGE | 2009 | 12.61\% | -37.40\% |
| OGE | 2010 | 9.35\% | 18.45\% |
| OGE | 2011 | 15.62\% | -8.88\% |
| OGE | 2012 | 10.05\% | -16.46\% |
| OGE | 2013 | 9.67\% | -6.28\% |
| OGE | 2015-2017 | 2.83\% | 13.02\% |
| OTTR | 2003 | 7.72\% | -1.53\% |
| OTTR | 2004 | 7.71\% | 8.76\% |
| OTTR | 2005 | 2.20\% | 16.05\% |
| OTTR | 2006 | 3.08\% | 2.44\% |
| OTTR | 2007 | 18.84\% | -5.66\% |
| OTTR | 2008 | 21.50\% | -12.89\% |
| OTTR | 2009 | 5.88\% | -25.12\% |
| OTTR | 2010 | 0.92\% | 6.68\% |
| OTTR | 2011 | -2.81\% | -0.89\% |
| OTTR | 2012 | -0.70\% | -0.04\% |
| OTTR | 2013 | 5.14\% | 0.00\% |

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| :---: | :---: | :---: | :---: |
| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| OTTR | 2015-2017 | 17.78\% | 9.43\% |
| POM | 2003 | 2.46\% | 4.72\% |
| POM | 2004 | 1.77\% | -2.41\% |
| POM | 2005 | 3.16\% | 8.26\% |
| POM | 2006 | 3.62\% | 0.07\% |
| POM | 2007 | 3.96\% | 7.73\% |
| POM | 2008 | 5.55\% | 8.23\% |
| POM | 2009 | 6.60\% | -18.83\% |
| POM | 2010 | -13.43\% | -12.19\% |
| POM | 2011 | 7.13\% | -21.49\% |
| POM | 2012 | -5.72\% | 0.33\% |
| POM | 2013 | 0.65\% | 10.00\% |
| POM | 2015-2017 | 3.85\% | 8.72\% |
| PCG | 2003 | 6.96\% | -21.92\% |
| PCG | 2004 | 4.87\% | 1.25\% |
| PCG | 2005 | 5.09\% | 0.51\% |
| PCG | 2006 | 9.17\% | -1.86\% |
| PCG | 2007 | 8.59\% | -2.78\% |
| PCG | 2008 | 11.01\% | -0.45\% |
| PCG | 2009 | 10.02\% | -16.74\% |
| PCG | 2010 | 8.85\% | -5.10\% |
| PCG | 2011 | 7.01\% | 0.97\% |
| PCG | 2012 | 7.04\% | -5.68\% |
| PCG | 2013 | 6.38\% | -2.89\% |
| PCG | 2015-2017 | 19.24\% | 0.26\% |
| PNW | 2003 | 15.44\% | -7.45\% |
| PNW | 2004 | 0.74\% | 2.15\% |
| PNW | 2005 | 0.55\% | 2.48\% |
| PNW | 2006 | 4.02\% | 9.44\% |
| PNW | 2007 | 7.04\% | -3.22\% |
| PNW | 2008 | 5.69\% | -9.59\% |
| PNW | 2009 | 3.83\% | -5.69\% |
| PNW | 2010 | 3.47\% | -4.33\% |
| PNW | 2011 | 4.00\% | -4.50\% |
| PNW | 2012 | 3.99\% | -2.10\% |
| PNW | 2013 | 4.34\% | -0.53\% |
| PNW | 2015-2017 | 17.25\% | -5.38\% |
| PNM | 2003 | 17.52\% | 5.96\% |
| PNM | 2004 | 5.93\% | 4.07\% |
| PNM | 2005 | 28.37\% | 0.81\% |
| PNM | 2006 | 26.06\% | -5.59\% |
| PNM | 2007 | -21.97\% | -0.76\% |
| PNM | 2008 | 8.74\% | -5.85\% |
| PNM | 2009 | 4.40\% | -19.45\% |
| PNM | 2010 | 3.36\% | -1.74\% |
| PNM | 2011 | 5.30\% | -3.50\% |
| PNM | 2012 | 5.04\% | -24.43\% |
| PNM | 2013 | 4.99\% | -2.28\% |
| PNM | 2015-2017 | 15.75\% | -0.20\% |
| POR | 2005 | 7.08\% | -7.12\% |
| POR | 2006 | 11.58\% | -5.79\% |
| POR | 2007 | 12.80\% | 1.66\% |
| POR | 2008 | 7.66\% | -7.01\% |
| POR | 2009 | 16.87\% | -11.54\% |
| POR | 2010 | 7.13\% | -7.74\% |
| POR | 2011 | 3.68\% | -1.92\% |
| POR | 2012 | 2.22\% | -1.52\% |
| POR | 2013 | 2.40\% | 0.33\% |
| POR | 2015-2017 | 2.01\% | 9.80\% |
| PPL | 2003 | 9.20\% | -5.76\% |
| PPL | 2004 | 7.30\% | -3.05\% |
| PPL | 2005 | -2.61\% | 9.87\% |


| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| PPL | 2006 | 10.56\% | 0.34\% |
| PPL | 2007 | 4.44\% | -9.82\% |
| PPL | 2008 | -1.50\% | 25.68\% |
| PPL | 2009 | 6.11\% | -11.47\% |
| PPL | 2010 | 58.33\% | -28.77\% |
| PPL | 2011 | 30.72\% | 14.35\% |
| PPL | 2012 | 8.10\% | -14.30\% |
| PPL | 2013 | 9.67\% | -5.34\% |
| PPL | 2015-2017 | 18.17\% | -3.29\% |
| PEG | 2003 | 8.50\% | 22.11\% |
| PEG | 2004 | 10.69\% | -10.63\% |
| PEG | 2005 | -3.01\% | 16.55\% |
| PEG | 2006 | -2.50\% | 0.37\% |
| PEG | 2007 | 2.10\% | 3.49\% |
| PEG | 2008 | 8.72\% | 1.18\% |
| PEG | 2009 | 6.98\% | -17.81\% |
| PEG | 2010 | 6.15\% | -10.63\% |
| PEG | 2011 | 8.90\% | -11.68\% |
| PEG | 2012 | 7.15\% | -20.19\% |
| PEG | 2013 | 5.62\% | -4.35\% |
| PEG | 2015-2017 | 12.87\% | 2.16\% |
| SCG | 2003 | 17.23\% | -1.35\% |
| SCG | 2004 | 5.38\% | 7.93\% |
| SCG | 2005 | -0.41\% | 23.47\% |
| SCG | 2006 | 4.05\% | -8.20\% |
| SCG | 2007 | 7.58\% | -5.86\% |
| SCG | 2008 | 10.18\% | 4.47\% |
| SCG | 2009 | 8.48\% | -26.57\% |
| SCG | 2010 | 7.25\% | 1.25\% |
| SCG | 2011 | 3.98\% | -7.85\% |
| SCG | 2012 | 9.14\% | -16.87\% |
| SCG | 2013 | 10.81\% | -2.98\% |
| SCG | 2015-2017 | 26.54\% | -5.35\% |
| SRE | 2003 | 53.31\% | -14.54\% |
| SRE | 2004 | 5.84\% | 12.72\% |
| SRE | 2005 | 9.16\% | 14.27\% |
| SRE | 2006 | 8.88\% | -7.96\% |
| SRE | 2007 | 12.97\% | -13.91\% |
| SRE | 2008 | 13.31\% | -16.99\% |
| SRE | 2009 | 8.40\% | -30.49\% |
| SRE | 2010 | 8.72\% | 2.15\% |
| SRE | 2011 | 18.60\% | -6.00\% |
| SRE | 2012 | 8.92\% | -13.09\% |
| SRE | 2013 | 5.16\% | -0.90\% |
| SRE | 2015-2017 | 15.19\% | 6.55\% |
| SO | 2003 | 11.74\% | -4.55\% |
| SO | 2004 | 3.00\% | 2.70\% |
| SO | 2005 | 3.95\% | 9.56\% |
| SO | 2006 | 5.47\% | 0.43\% |
| SO | 2007 | 7.19\% | -0.23\% |
| so | 2008 | 7.65\% | 3.62\% |
| SO | 2009 | 9.34\% | -15.93\% |
| SO | 2010 | 7.07\% | 3.56\% |
| SO | 2011 | 7.16\% | -5.61\% |
| SO | 2012 | 7.25\% | -12.34\% |
| SO | 2013 | 5.44\% | -2.87\% |
| SO | 2015-2017 | 20.83\% | -2.63\% |
| TE | 2003 | 3.93\% | -1.48\% |
| TE | 2004 | -17.98\% | 18.77\% |
| TE | 2005 | -1.95\% | 15.02\% |
| TE | 2006 | 4.38\% | 9.74\% |
| TE | 2007 | 2.54\% | 0.01\% |

DuPont Formula - Regression Analysis
Change in

| Ticker | Year | Change in Net Plant | Change in Revenue/Net Plant |
| :---: | :---: | :---: | :---: |
| TE | 2008 | 6.81\% | -10.64\% |
| TE | 2009 | 6.18\% | -7.63\% |
| TE | 2010 | 5.36\% | 0.00\% |
| TE | 2011 | 2.17\% | -6.18\% |
| TE | 2012 | 2.80\% | -14.17\% |
| TE | 2013 | 3.02\% | 0.36\% |
| TE | 2015-2017 | 14.32\% | -1.77\% |
| UIL | 2003 | 6.13\% | -19.71\% |
| UIL | 2004 | 2.75\% | 11.22\% |
| UIL | 2005 | 5.00\% | 4.91\% |
| UIL | 2006 | 9.27\% | -36.18\% |
| UIL | 2007 | 35.77\% | -14.50\% |
| UIL | 2008 | 22.22\% | -20.96\% |
| UIL | 2009 | 7.40\% | -12.00\% |
| UIL | 2010 | 101.86\% | -44.88\% |
| UIL | 2011 | 10.44\% | 42.53\% |
| UIL | 2012 | 5.04\% | -8.46\% |
| UIL | 2013 | 3.70\% | 2.18\% |
| UIL | 2015-2017 | 10.71\% | 4.44\% |
| UNS | 2003 | 24.02\% | -8.66\% |
| UNS | 2004 | 0.58\% | 19.84\% |
| UNS | 2005 | 4.34\% | 0.80\% |
| UNS | 2006 | 4.06\% | 2.93\% |
| UNS | 2007 | 6.54\% | -1.54\% |
| UNS | 2008 | 8.74\% | -6.97\% |
| UNS | 2009 | 6.42\% | -6.24\% |
| UNS | 2010 | 6.31\% | -1.94\% |
| UNS | 2011 | 7.46\% | -3.37\% |
| UNS | 2012 | 7.00\% | -10.22\% |
| UNS | 2013 | 7.05\% | -3.36\% |
| UNS | 2015-2017 | 22.50\% | -6.66\% |
| WC | 2003 | 21.58\% | -27.63\% |
| WVC | 2004 | 7.61\% | -1.09\% |
| WVC | 2005 | 4.44\% | 14.91\% |
| WVC | 2006 | 5.93\% | -4.97\% |
| WC | 2007 | 6.46\% | 4.98\% |
| WVC | 2008 | 7.11\% | 1.66\% |
| VVC | 2009 | 5.83\% | -20.56\% |
| VVC | 2010 | 2.66\% | -0.70\% |
| VVC | 2011 | 2.61\% | 6.41\% |
| WVC | 2012 | 3.87\% | -7.88\% |
| WVC | 2013 | 3.17\% | 1.93\% |
| WVC | 2015-2017 | 10.77\% | 11.88\% |
| WR | 2003 | -2.15\% | -15.69\% |
| WR | 2004 | 0.04\% | 0.19\% |
| WR | 2005 | 0.94\% | 7.11\% |
| WR | 2006 | 3.14\% | -1.67\% |
| WR | 2007 | 17.98\% | -8.85\% |
| WR | 2008 | 15.19\% | -7.55\% |
| WR | 2009 | 4.30\% | -3.13\% |
| WR | 2010 | 9.32\% | 1.22\% |
| WR | 2011 | 6.91\% | -1.24\% |
| WR | 2012 | 7.48\% | -3.57\% |
| WR | 2013 | 3.45\% | 0.53\% |
| WR | 2015-2017 | 13.33\% | 1.81\% |
| WEC | 2003 | 34.72\% | -19.45\% |
| WEC | 2004 | -0.39\% | -15.04\% |
| WEC | 2005 | 7.79\% | 3.17\% |
| WEC | 2006 | 10.84\% | -5.50\% |
| WEC | 2007 | 8.91\% | -2.64\% |
| WEC | 2008 | 10.88\% | -5.70\% |
| WEC | 2009 | 6.50\% | -12.53\% |

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| Ticker | Year | Change in Net Plant | Change in <br> Revenue/Net Plant |
| :--- | ---: | ---: | ---: |
| WEC | 2010 | $5.85 \%$ | $-3.82 \%$ |
| WEC | 2011 | $5.82 \%$ | $0.89 \%$ |
| WEC | 2012 | $3.89 \%$ | $-7.74 \%$ |
| WEC | 2013 | $2.98 \%$ | $2.75 \%$ |
| WEC | $2015-2017$ | $6.03 \%$ | $7.79 \%$ |
| XEL | 2003 | $-27.37 \%$ | $14.74 \%$ |
| XEL | 2004 | $3.14 \%$ | $1.94 \%$ |
| XEL | 2005 | $4.26 \%$ | $10.63 \%$ |
| XEL | 2006 | $5.80 \%$ | $-3.38 \%$ |
| XEL | 2007 | $7.25 \%$ | $-4.92 \%$ |
| XEL | 2008 | $6.07 \%$ | $5.26 \%$ |
| XEL | 2009 | $4.63 \%$ | $-17.72 \%$ |
| XEL | 2010 | $11.64 \%$ | $-4.24 \%$ |
| XEL | 2011 | $8.18 \%$ | $-4.48 \%$ |
| XEL | 2012 | $7.14 \%$ | $-12.41 \%$ |
| XEL | 2013 | $8.66 \%$ | $-3.37 \%$ |
| XEL | $2015-2017$ | $13.74 \%$ | $1.74 \%$ |

## SUMMARY OUTPUT

| Regression Statistics |  |
| :--- | ---: |
| Multiple R | 0.39545972 |
| R Square | 0.15638839 |
| Adjusted R Square | 0.15491612 |
| Standard Error | 0.13911066 |
| Observations | 575 |


|  | df | SS | MS | $F$ | Significance $F$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Regression | 1 | 2.05559430 | 2.05559430 | 106.22251481 | 0.00000000 |  |
| Residual | 573 | 11.08856756 | 0.01935178 |  |  |  |
| Total | 574 | 13.14416186 |  |  |  |  |
|  | Coefficients | Standard Error | t Stat | P-value | Lower 95\% | Upper 95\% |
| Intercept | 0.02132933 | 0.00727660 | 2.93122191 | 0.00351100 | 0.00703727 | 0.03562140 |
| Change in Net Plant | -0.51192493 | 0.04967044 | -10.30643075 | 0.00000000 | -0.60948327 | -0.41436659 |

Flotation Cost Adjustment

| Company | Date | Shares Issued | Offering Price | Underwriting Discount | Offering Expense | Net Proceeds Per Share | Total Flotation Costs | Gross Equity Issue Before Costs | Net Proceeds | Flotation Cost Percentage |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| TECO Energy Inc. | 10/10/2002 | 19,550,000 | \$11.00 | \$0.3300 | \$500,000 | \$10.64 | \$6,951,500 | \$215,050,000 | \$208,098,500 | 3.233\% |
| TECO Energy Inc. | 6/4/2002 | 15,525,000 | \$23.00 | \$0.6900 | \$250,000 | \$22.29 | \$10,962,250 | \$357,075,000 | \$346,112,750 | 3.070\% |
| American Electric Power Company, Inc. | 4/1/2009 | 69,000,000 | \$24.50 | \$0.7350 | \$400,000 | \$23.76 | \$51,115,000 | \$1,690,500,000 | \$1,639,385,000 | 3.024\% |
| American Electric Power Company, Inc. | 2/27/2003 | 57,500,000 | \$20.95 | \$0.6285 | \$550,000 | \$20.31 | \$36,688,750 | \$1,204,625,000 | \$1,167,936,250 | 3.046\% |
| Cleco Corp. | 8/14/2006 | 6,900,000 | \$23.75 | \$0.8900 | \$225,000 | \$22.83 | \$6,366,000 | \$163,875,000 | \$157,509,000 | 3.885\% |
| Cleco Corp. | 11/9/2004 | 2,000,000 | \$18.50 | \$0.6475 | \$200,000 | \$17.75 | \$1,495,000 | \$37,000,000 | \$35,505,000 | 4.041\% |
| Empire District Electric | 12/6/2007 | 3,450,000 | \$23.00 | \$0.9775 | \$250,000 | \$21.95 | \$3,622,375 | \$79,350,000 | \$75,727,625 | 4.565\% |
| Empire District Electric | 6/15/2006 | 3,795,000 | \$20.25 | \$0.8600 | \$250,000 | \$19.32 | \$3,513,700 | \$76,848,750 | \$73,335,050 | 4.572\% |
| Great Plains Energy Inc. | 5/12/2009 | 11,500,000 | \$14.00 | \$0.4900 | \$500,000 | \$13.47 | \$6,135,000 | \$161,000,000 | \$154,865,000 | 3.811\% |
| Great Plains Energy Inc. | 5/17/2006 | 7,002,450 | \$27.50 | \$0.8938 | \$500,000 | \$26.53 | \$6,758,790 | \$192,567,375 | \$185,808,585 | 3.510\% |
| IDACORP, Inc. | 12/9/2004 | 4,025,000 | \$30.00 | \$1.2000 | \$300,000 | \$28.73 | \$5,130,000 | \$120,750,000 | \$115,620,000 | 4.248\% |
| Otter Tail Corporation | 9/19/2008 | 5,175,000 | \$30.00 | \$1.0875 | \$400,000 | \$28.84 | \$6,027,813 | \$155,250,000 | \$149,222,188 | 3.883\% |
| Otter Tail Corporation | 12/7/2004 | 3,335,000 | \$25.45 | \$0.9500 | \$300,000 | \$24.41 | \$3,468,250 | \$84,875,750 | \$81,407,500 | 4.086\% |
| Pinnacle West Capital Corp. | 4/8/2010 | 6,900,000 | \$38.00 | \$1.3300 | \$190,000 | \$36.64 | \$9,367,000 | \$262,200,000 | \$252,833,000 | 3.572\% |
| Pinnacle West Capital Corp. | 4/27/2005 | 6,095,000 | \$42.00 | \$1.3650 | \$250,000 | \$40.59 | \$8,569,675 | \$255,990,000 | \$247,420,325 | 3.348\% |
| PNM Resources, Inc. | 12/6/2006 | 5,750,000 | \$30.79 | \$1.0780 | \$250,000 | \$29.67 | \$6,448,500 | \$177,042,500 | \$170,594,000 | 3.642\% |
| PNM Resources, Inc. | 3/23/2005 | 3,910,000 | \$26.76 | \$0.8697 | \$200,000 | \$25.84 | \$3,600,527 | \$104,631,600 | \$101,031,073 | 3.441\% |
| Portland General Electric Company | 3/5/2009 | 12,477,500 | \$14.10 | \$0.4935 | \$375,000 | \$13.58 | \$6,532,646 | \$175,932,750 | \$169,400,104 | 3.713\% |
| Portland General Electric Company | 6/12/2007 | 23,658,106 | \$26.00 | \$0.7800 | \$700,000 | \$25.19 | \$19,153,323 | \$615,110,756 | \$595,957,433 | 3.114\% |
| Southem Company | 12/6/2000 | 28,750,000 | \$28.50 | \$0.9200 | \$490,000 | \$27.56 | \$26,940,000 | \$819,375,000 | \$792,435,000 | 3.288\% |
| Westar Energy, Inc. | 11/4/2010 | 8,625,000 | \$25.54 | \$0.8939 | \$250,000 | \$24.62 | \$7,959,888 | \$220,282,500 | \$212,322,613 | 3.613\% |
| Westar Energy, Inc. | 5/29/2008 | 6,900,000 | \$24.28 | \$0.8498 | \$325,000 | \$23.38 | \$6,188,620 | \$167,532,000 | \$161,343,380 | 3.694\% |
| Mean |  |  |  |  |  |  | \$11,045,209 | \$333,493,817 |  |  |

Constant Growth Discounted Cash Flow Model Adjusted for Flotation Costs - 30 Day Average Stock Price


## Notes:

The proxy group DCF result is adjusted for flotation costs by dividing each company's expected dividend yield
by ( 1 - flotation cost). The flotation cost adjustment is derived as the difference between the unadjusted DCF
esult and the DCF result adjusted for flotation costs.
[1] Source: Bloomberg Professional
[2] Source: Bloomberg Professiona

- [3] Equals [1]/ [2]

(4] Equals [3] $\times(1+0.5 \times[9])$
[5] Equals [4]/ ( $1-0.0331$ )
6] Source: Zacks
[7] Source: Yahoo! Finance
[8] Source: Value Line
[9] Equals Average([6], [7], [8])
[10] Equals [4] $+[9]$
[11] Equals [5] + [9]
[12] Equals average [11]- average [10]

DCF Result Adjusted For Flotation Costs: $\quad 10.74 \%$ DCF Result Unadjusted For Flotation Costs: $\qquad$ Difference (Flotation Cost Adjustment): $0.14 \%[12$

Components of the S\&P 500 Market Risk Premium


## Moody's Utility Bond Index Baa/A Credit Spread



Moody's Utility Bond Index Baa/A Credit Spread and 30-Year Treasury Yield


## Treasury/Dividend Yield Spread



Proxy Group Capital Structure

| Company | Ticker | \% Common Equity |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 2012Q3 | 2012Q2 | 2012Q1 | 2011Q4 | 2011Q3 | 2011Q2 | 2011Q1 | 2010Q4 | Average |
| American Electric Power Company, Inc. | AEP | 48.05\% | 47.67\% | 47.22\% | 48.97\% | 49.44\% | 48.00\% | 47.23\% | 47.35\% | 47.99\% |
| Cleco Corporation | CNL | 49.77\% | 48.91\% | 48.38\% | 48.08\% | 47.52\% | 47.75\% | 46.98\% | 47.33\% | 48.09\% |
| Empire District Electric Company | EDE | 53.03\% | 51.81\% | 52.02\% | 51.82\% | 51.79\% | 50.24\% | 50.60\% | 50.00\% | 51.41\% |
| Great Plains Energy Inc. | GXP | 51.77\% | 47.37\% | 49.13\% | 50.07\% | 50.74\% | 49.18\% | 49.45\% | 50.35\% | 49.76\% |
| IDACORP, Inc. | IDA | 51.53\% | 50.21\% | 50.88\% | 50.59\% | 50.44\% | 48.95\% | 48.84\% | 46.61\% | 49.76\% |
| Otter Tail Corporation | OTTR | 49.45\% | 49.57\% | 50.31\% | 50.28\% | 51.81\% | 51.86\% | 51.61\% | 51.12\% | 50.75\% |
| Pinnacle West Capital Corporation | PNW | 56.30\% | 53.78\% | 52.76\% | 54.46\% | 52.06\% | 52.44\% | 52.57\% | 52.97\% | 53.42\% |
| PNM Resources, Inc. | PNM | 51.08\% | 48.68\% | 49.53\% | 48.61\% | 46.70\% | 45.64\% | 46.87\% | 47.42\% | 48.07\% |
| Portland General Electric Company | POR | 49.74\% | 49.47\% | 49.37\% | 48.51\% | 47.90\% | 47.78\% | 47.74\% | 46.57\% | 48.38\% |
| Southern Company | SO | 47.91\% | 46.66\% | 45.65\% | 46.50\% | 50.96\% | 49.54\% | 49.80\% | 48.39\% | 48.18\% |
| Westar Energy, Inc. | WR | 58.96\% | 57.26\% | 58.19\% | 59.31\% | 57.87\% | 56.29\% | 56.99\% | 57.66\% | 57.81\% |

Operating Company Capital Structure

| Operating Company Capital Structure |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | \% Com | Equity |  |  |  |
| Operating Company | Parent | 2012Q3 | 2012Q2 | 2012Q1 | 2011Q4 | 2011Q3 | 2011Q2 | 2011Q1 | 2010Q4 |
| Appalachian Power Company | AEP | 44.04\% | 43.63\% | 43.41\% | 42.80\% | 44.19\% | 43.14\% | 41.53\% | 43.19\% |
| AEP Texas Central Company | AEP | 47.67\% | 46.97\% | 45.78\% | 62.61\% | 60.84\% | 47.26\% | 44.99\% | 44.85\% |
| Indiana Michigan Power Company | AEP | 49.61\% | 49.42\% | 49.55\% | 49.13\% | 49.10\% | 48.64\% | 48.86\% | 47.81\% |
| Kentucky Power Company | AEP | 46.46\% | 46.12\% | 45.76\% | 45.61\% | 45.62\% | 45.42\% | 45.50\% | 44.84\% |
| Ohio Power Company | AEP | 54.38\% | 53.94\% | 53.49\% | 52.12\% | 53.92\% | 54.34\% | 54.52\% | 53.43\% |
| Public Service Company of Oklahoma | AEP | 49.69\% | 48.93\% | 48.40\% | 48.52\% | 48.56\% | 47.51\% | 45.21\% | 44.22\% |
| Southwestern Electric Power Company | AEP | 50.42\% | 49.27\% | 48.55\% | 49.96\% | 51.38\% | 50.32\% | 49.58\% | 49.15\% |
| AEP Texas North Company | AEP | 44.68\% | 44.43\% | 44.81\% | 45.25\% | 45.26\% | 43.74\% | 43.29\% | 45.52\% |
| Kingsport Power Company | AEP | 44.60\% | 47.42\% | 48.58\% | 48.27\% | 47.26\% | 50.87\% | 47.37\% | 46.71\% |
| Wheeling Power Company | AEP | 48.95\% | 46.54\% | 43.84\% | 45.44\% | 48.30\% | 48.72\% | 51.49\% | 53.73\% |
| Cleco Power LLC | CNL | 49.77\% | 48.91\% | 48.38\% | 48.08\% | 47.52\% | 47.75\% | 46.98\% | 47.33\% |
| Empire District Electric Company | EDE | 53.03\% | 51.81\% | 52.02\% | 51.82\% | 51.79\% | 50.24\% | 50.60\% | 50.00\% |
| KCP\&L Greater Missouri Operations Company | GXP | 54.19\% | 47.22\% | 50.04\% | 51.45\% | 51.77\% | 50.29\% | 50.27\% | 51.27\% |
| Kansas City Power \& Light Company | GXP | 49.36\% | 47.51\% | 48.21\% | 48.69\% | 49.71\% | 48.08\% | 48.63\% | 49.43\% |
| Idaho Power Co. | IDA | 51.53\% | 50.21\% | 50.88\% | 50.59\% | 50.44\% | 48.95\% | 48.84\% | 46.61\% |
| Otter Tail Power Company | OTTR | 49.45\% | 49.57\% | 50.31\% | 50.28\% | 51.81\% | 51.86\% | 51.61\% | 51.12\% |
| Arizona Public Service Company | PNW | 56.30\% | 53.78\% | 52.76\% | 54.46\% | 52.06\% | 52.44\% | 52.57\% | 52.97\% |
| Public Service Company of New Mexico | PNM | 51.08\% | 48.68\% | 49.53\% | 48.61\% | 46.70\% | 45.64\% | 46.87\% | 47.42\% |
| Portland General Electric Company | POR | 49.74\% | 49.47\% | 49.37\% | 48.51\% | 47.90\% | 47.78\% | 47.74\% | 46.57\% |
| Georgia Power Company | SO | 49.60\% | 47.90\% | 48.51\% | 50.24\% | 51.93\% | 49.83\% | 49.70\% | 49.64\% |
| Alabama Power Company | SO | 47.52\% | 46.81\% | 45.57\% | 46.53\% | 47.29\% | 46.71\% | 46.46\% | 46.54\% |
| Gulf Power Company | SO | 48.35\% | 46.07\% | 46.72\% | 45.41\% | 47.06\% | 45.62\% | 45.82\% | 44.89\% |
| Mississippi Power Company | SO | 46.17\% | 45.88\% | 41.82\% | 43.83\% | 57.54\% | 55.99\% | 57.21\% | 52.51\% |
| Kansas Gas and Electric Company | WR | 59.27\% | 58.30\% | 57.85\% | 57.55\% | 57.70\% | 56.77\% | 56.52\% | 57.00\% |
| Westar Energy (KPL) | WR | 58.65\% | 56.21\% | 58.54\% | 61.07\% | 58.04\% | 55.80\% | 57.45\% | 58.32\% |

Proxy Group Capital Structure

| Company | Ticker | 2012Q3 | 2012Q2 | 2012Q1 | 2011Q4 | $\begin{aligned} & \hline \text { \% Debt } \\ & \text { 2011Q3 } \\ & \hline \end{aligned}$ | 2011Q2 | 2011Q1 | 2010Q4 | Average |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| American Electric Power Company, Inc. | AEP | 51.95\% | 52.33\% | 52.78\% | 51.03\% | 50.56\% | 52.00\% | 52.77\% | 52.65\% | 52.01\% |
| Cleco Corporation | CNL | 50.23\% | 51.09\% | 51.62\% | 51.92\% | 52.48\% | 52.25\% | 53.02\% | 52.67\% | 51.91\% |
| Empire District Electric Company | EDE | 46.97\% | 48.19\% | 47.98\% | 48.18\% | 48.21\% | 49.76\% | 49.40\% | 50.00\% | 48.59\% |
| Great Plains Energy Inc. | GXP | 48.23\% | 52.63\% | 50.87\% | 49.93\% | 49.26\% | 50.82\% | 50.55\% | 49.65\% | 50.24\% |
| IDACORP, Inc. | IDA | 48.47\% | 49.79\% | 49.12\% | 49.41\% | 49.56\% | 51.05\% | 51.16\% | 53.39\% | 50.24\% |
| Otter Tail Corporation | OTTR | 50.55\% | 50.43\% | 49.69\% | 49.72\% | 48.19\% | 48.14\% | 48.39\% | 48.88\% | 49.25\% |
| Pinnacle West Capital Corporation | PNW | 43.70\% | 46.22\% | 47.24\% | 45.54\% | 47.94\% | 47.56\% | 47.43\% | 47.03\% | 46.58\% |
| PNM Resources, Inc. | PNM | 48.92\% | 51.32\% | 50.47\% | 51.39\% | 53.30\% | 54.36\% | 53.13\% | 52.58\% | 51.93\% |
| Portland General Electric Company | POR | 50.26\% | 50.53\% | 50.63\% | 51.49\% | 52.10\% | 52.22\% | 52.26\% | 53.43\% | 51.62\% |
| Southern Company | SO | 52.09\% | 53.34\% | 54.35\% | 53.50\% | 49.04\% | 50.46\% | 50.20\% | 51.61\% | 51.82\% |
| Westar Energy, Inc. | WR | 41.04\% | 42.74\% | 41.81\% | 40.69\% | 42.13\% | 43.71\% | 43.01\% | 42.34\% | 42.19\% |

Operating Company Capital Structure

| Operating Company Capital Structure |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  |  |
| Operating Company | Parent | 2012Q3 | 2012Q2 | 2012Q1 | 2011 Q4 | 2011Q3 | 2011Q2 | 2011Q1 | $2010 Q 4$ |
| Appalachian Power Company | AEP | 55.96\% | 56.37\% | 56.59\% | 57.20\% | 55.81\% | 56.86\% | 58.47\% | 56.81\% |
| AEP Texas Central Company | AEP | 52.33\% | 53.03\% | 54.22\% | 37.39\% | 39.16\% | 52.74\% | 55.01\% | 55.15\% |
| Indiana Michigan Power Company | AEP | 50.39\% | 50.58\% | 50.45\% | 50.87\% | 50.90\% | 51.36\% | 51.14\% | 52.19\% |
| Kentucky Power Company | AEP | 53.54\% | 53.88\% | 54.24\% | 54.39\% | 54.38\% | 54.58\% | 54.50\% | 55.16\% |
| Ohio Power Company | AEP | 45.62\% | 46.06\% | 46.51\% | 47.88\% | 46.08\% | 45.66\% | 45.48\% | 46.57\% |
| Public Service Company of Oklahoma | AEP | 50.31\% | 51.07\% | 51.60\% | 51.48\% | 51.44\% | 52.49\% | 54.79\% | 55.78\% |
| Southwestern Electric Power Company | AEP | 49.58\% | 50.73\% | 51.45\% | 50.04\% | 48.62\% | 49.68\% | 50.42\% | 50.85\% |
| AEP Texas North Company | AEP | 55.32\% | 55.57\% | 55.19\% | 54.75\% | 54.74\% | 56.26\% | 56.71\% | 54.48\% |
| Kingsport Power Company | AEP | 55.40\% | 52.58\% | 51.42\% | 51.73\% | 52.74\% | 49.13\% | 52.63\% | 53.29\% |
| Wheeling Power Company | AEP | 51.05\% | 53.46\% | 56.16\% | 54.56\% | 51.70\% | 51.28\% | 48.51\% | 46.27\% |
| Cleco Power LLC | CNL | 50.23\% | 51.09\% | 51.62\% | 51.92\% | 52.48\% | 52.25\% | 53.02\% | 52.67\% |
| Empire District Electric Company | EDE | 46.97\% | 48.19\% | 47.98\% | 48.18\% | 48.21\% | 49.76\% | 49.40\% | 50.00\% |
| KCP\&L Greater Missouri Operations Company | GXP | 45.81\% | 52.78\% | 49.96\% | 48.55\% | 48.23\% | 49.71\% | 49.73\% | 48.73\% |
| Kansas City Power \& Light Company | GXP | 50.64\% | 52.49\% | 51.79\% | 51.31\% | 50.29\% | 51.92\% | 51.37\% | 50.57\% |
| Idaho Power Co. | IDA | 48.47\% | 49.79\% | 49.12\% | 49.41\% | 49.56\% | 51.05\% | 51.16\% | 53.39\% |
| Otter Tail Power Company | OTTR | 50.55\% | 50.43\% | 49.69\% | 49.72\% | 48.19\% | 48.14\% | 48.39\% | 48.88\% |
| Arizona Public Service Company | PNW | 43.70\% | 46.22\% | 47.24\% | 45.54\% | 47.94\% | 47.56\% | 47.43\% | 47.03\% |
| Public Service Company of New Mexico | PNM | 48.92\% | 51.32\% | 50.47\% | 51.39\% | 53.30\% | 54.36\% | 53.13\% | 52.58\% |
| Portland General Electric Company | POR | 50.26\% | 50.53\% | 50.63\% | 51.49\% | 52.10\% | 52.22\% | 52.26\% | 53.43\% |
| Georgia Power Company | SO | 50.40\% | 52.10\% | 51.49\% | 49.76\% | 48.07\% | 50.17\% | 50.30\% | 50.36\% |
| Alabama Power Company | SO | 52.48\% | 53.19\% | 54.43\% | 53.47\% | 52.71\% | 53.29\% | 53.54\% | 53.46\% |
| Gulf Power Company | SO | 51.65\% | 53.93\% | 53.28\% | 54.59\% | 52.94\% | 54.38\% | 54.18\% | 55.11\% |
| Mississippi Power Company | SO | 53.83\% | 54.12\% | 58.18\% | 56.17\% | 42.46\% | 44.01\% | 42.79\% | 47.49\% |
| Kansas Gas and Electric Company | WR | 40.73\% | 41.70\% | 42.15\% | 42.45\% | 42.30\% | 43.23\% | 43.48\% | 43.00\% |
| Westar Energy (KPL) | WR | 41.35\% | 43.79\% | 41.46\% | 38.93\% | 41.96\% | 44.20\% | 42.55\% | 41.68\% |

Source: SNL Financial

## ATTACHMENT A

## OF

ROBERT B. HEVERT

ON BEHALF OF TAMPA ELECTRIC COMPANY

# TAMPA ELECTRIC COMPANY DOCKET NO. 130040-EI WITNESS: HEVERT ATTACHMENT A <br> PAGE 1 OF 12 <br> FILED: 04/05/2013 

## Attachment A

## Robert B. Hevert, CFA Managing Partner <br> Sussex Economic Advisors, LLC

Mr. Hevert is an economic and financial consultant with broad experience in regulated industries. He has an extensive background in the areas of corporate finance, corporate strategic planning, energy market assessment, mergers, and acquisitions, asset-based transactions, feasibility and due diligence analyses, and providing expert testimony in litigated proceedings. Mr. Hevert has significant management experience with both operating and professional services companies.

## REPRESENTATIVE PROJECT EXPERIENCE

## Litigation Support and Expert Testimony

Provided expert testimony and support of litigation in various regulatory proceedings on a variety of energy and economic issues including: cost of capital for ratemaking purposes; the proposed transfer of power purchase agreements; procurement of residual service electric supply; the legal separation of generation assets; merger-related synergies; assessment of economic damages; and specific financing transactions. Services provided include collaborating with counsel, business and technical staff to develop litigation strategies, preparing and reviewing discovery and briefing materials, preparing presentation materials and participating in technical sessions with regulators and intervenors.

## Financial and Economic Advisory Services

Retained by numerous leading energy companies and financial institutions throughout North America to provide services relating to the strategic evaluation, acquisition, sale or development of a variety of regulated and nonregulated enterprises. Specific services have included: developing strategic and financial analyses and managing multi-faceted due diligence reviews of proposed corporate M\&A counter-parties; developing, screening and recommending potential M\&A transactions and facilitating discussions between senior utility executives regarding transaction strategy and structure; performing valuation analyses and financial due diligence reviews of electric generation projects, retail marketing companies, and wholesale trading entities in support of significant M\&A transactions.

Specific divestiture-related services have included advising both buy and sell-side clients in transactions for physical and contractual electric generation resources. Sell-side services have included: development and implementation of key aspects of asset divestiture programs such as marketing, offering memorandum development, development of transaction terms and conditions, bid process management, bid evaluation, negations, and regulatory approval process. Buy-side services have included comprehensive asset screening, selection, valuation and due diligence reviews. Both buy and sell-side services have included the use of sophisticated asset valuation techniques, and the development and delivery of fairness opinions.

Specific corporate finance experience while a Vice President with Bay State Gas included: negotiation, placement and closing of both private and public long-term debt, preferred and common equity; structured and project financing; corporate cash management; financial analysis, planning and forecasting; and various aspects of investor relations.

## Regulatory Analysis and Ratemaking

On behalf of electric, natural gas and combination utilities throughout North America, provided services relating to energy industry restructuring including merchant function exit, residual energy supply obligations, and stranded cost assessment and recovery. Specific services provided include: performing strategic review and development of merchant function exit strategies including analysis of provider of last resort obligations in both electric and gas markets; and developing value optimizing strategies for physical generation assets.

## Energy Market Assessment

Retained by numerous leading energy companies and financial institutions nationwide to manage or provide assessments of regional energy markets throughout the U.S. and Canada. Such assessments have included development of electric and natural gas price forecasts, analysis of generation project entry and exit scenarios, assessment of natural gas and electric transmission infrastructure, market structure and regulatory situation analysis, and assessment of competitive position. Market assessment engagements typically have been used as integral elements of business unit or asset-specific strategic plans or valuation analyses.

## Resource Procurement, Contracting and Analysis

Assisted various clients in evaluating altematives for acquiring fuel and power supplies, including the development and negotiation of energy contracts and tolling agreements. Assignments also have included developing generation resource optimization strategies. Provided advice and analyses of transition service power supply contracts in the context of both physical and contractual generation resource divestiture transactions.

## Business Strategy and Operations

Retained by numerous leading North American energy companies and financial institutions nationwide to provide services relating to the development of strategic plans and planning processes for both regulated and non-regulated enterprises. Specific services provided include: developing and implementing electric generation strategies and business process redesign initiatives; developing market entry strategies for retail and wholesale businesses including assessment of asset-based marketing and trading strategies; and facilitating executive level strategic planning retreats. As Vice President, of Bay State was responsible for the company's strategic planning and business development processes, played an integral role in developing the company's non-regulated marketing affiliate, EnergyUSA, and managed the company's non-regulated investments, partnerships and strategic alliances.

## PROFESSIONAL HISTORY

Sussex Economic Advisors, LLC (2012 - Present)
Managing Partner
Concentric Energy Advisors, Inc. (2002 - 2012)
President
Navigant Consulting, Inc. (1997-2001)
Managing Director (2000-2001)
Director (1998-2000)
Vice President, REED Consulting Group (1997-1998)
Bay State Gas Company (now Columbia Gas Company of Massachusetts) (1987-1997)
Vice President and Assistant Treasurer
Boston College (1986-1987)
Financial Analyst
General Telephone Company of the South (1984-1986)
Revenue Requirements Analyst

## EDUCATION

M.B.A., University of Massachusetts at Amherst, 1984
B.S., University of Delaware, 1982

TAMPA ELECTRIC COMPANY

## Attachment A

## DESIGNATIONS AND PROFESSIONAL AFFILIATIONS

Chartered Financial Analyst, 1991
Association for Investment Management and Research
Boston Security Analyst Society

## PUBLICATIONS/PRESENTATIONS

Has made numerous presentations throughout the United States and Canada on several topics, including:

- Generation Asset Valuation and the Use of Real Options
- Retail and Wholesale Market Entry Strategies
- The Use Strategic Alliances in Restructured Energy Markets
- Gas Supply and Pipeline Infrastructure in the Northeast Energy Markets
- Nuclear Asset Valuation and the Divestiture Process


## AVAILABLE UPON REQUEST

Extensive client and project listings, and specific references.

Attachment A

| SPONSOR | Date | CASE/APPLICANT | DOCKET No. | SubJECT |
| :---: | :---: | :---: | :---: | :---: |
| Arizona Corporation Commission |  |  |  |  |
| Southwest Gas Corporation | 11/10 | Southwest Gas Corporation | Docket No. G-01551A-100458 | Return on Equity |
| Arkansas Public Service Commission |  |  |  |  |
| CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Arkansas Gas | 01/07 | CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Arkansas Gas | Docket No. 06-161-U | Return on Equity |
| California Public Utilites Commission |  |  |  |  |
| Southwest Gas Corporation | 09/12 | Southwest Gas Corporation | Docket No. A-12-12-024 | Return on Equity |
| Colorado Public Utilities Commission |  |  |  |  |
| Xcel Energy, Inc. | 12/12 | Public Service Company of Colorado | Docket No. 12AL-1268G | Return on Equity (gas) |
| Xcel Energy, Inc. | 11/11 | Public Service Company of Colorado | Docket No. 11AL-947E | Return on Equity (electric) |
| Xcel Energy, Inc. | 12/10 | Public Service Company of Colorado | Docket No. 10AL-963G | Return on Equity (electric) |
| Atmos Energy Corporation | 07/09 | Atmos Energy Colorado-Kansas Division | Docket No. 09AL-507G | Return on Equity (gas) |
| Xcel Energy, Inc. | 12/06 | Public Service Company of Colorado | Docket No. 06S-656G | Return on Equity (gas) |
| Xcel Energy, Inc. | 04/06 | Public Service Company of Colorado | Docket No. 06S-234EG | Return on Equity (electric) |
| Xcel Energy, Inc. | 08/05 | Public Service Company of Colorado | Docket No. 05S-369ST | Return on Equity (steam) |
| Xcel Energy, Inc. | 05/05 | Public Service Company of Colorado | Docket No. 05S-246G | Return on Equity (gas) |
| Connecticut Department of Public Utility Control |  |  |  |  |
| Southern Connecticut Gas Company | 09/08 | Southern Connecticut Gas Company | Docket No. 08-08-17 | Return on Equity |
| Southern Connecticut Gas Company | 12/07 | Southern Connecticut Gas Company | Docket No. 05-03-17PH02 | Return on Equity |
| Connecticut Natural Gas Corporation | 12/07 | Connecticut Natural Gas Corporation | Docket No. 06-03-04PH02 | Return on Equity |
| Delaware Public Service Commission |  |  |  |  |
| Delmarva Power \& Light Company | 12/12 | Delmarva Power \& Light Company | Case No. 12-546 | Return on Equity |
| Delmarva Power \& Light Company | 12/11 | Delmarva Power \& Light Company | Case No. 11-528 | Return on Equity |

Attachment A

| SPONSOR | Date | CASE/APPLICANT | DOCKET No. | Subject |
| :---: | :---: | :---: | :---: | :---: |
| District of Columbia Public Service Commission |  |  |  |  |
| Potomac Electric Power Company | 07/11 | Potomac Electric Power Company | Formal Case No. FC1087 | Return on Equity |
| Federal Energy Regulatory Commission |  |  |  |  |
| Public Service Company of New Mexico | 10/10 | Public Service Company of New Mexico | Docket No. ER 11-1915-000 | Return on Equity |
| Portland Natural Gas Transmission System | 05/10 | Portland Natural Gas Transmission System | Docket No. RP10-729-000 | Return on Equity |
| Florida Gas Transmission Company, LLC | 10/09 | Florida Gas Transmission Company, LLC | Docket No. RP10-21-000 | Return on Equity |
| Maritimes and Northeast Pipeline, LLC | 07/09 | Maritimes and Northeast Pipeline, LLC | Docket No. RP09-809-000 | Return on Equity |
| Spectra Energy | 02/08 | Saltville Gas Storage | Docket No. RP08-257-000 | Return on Equity |
| Panhandle Energy Pipelines | 08/07 | Panhandle Energy Pipelines | Docket No. PL07-2-000 | Response to draft policy statement regarding inclusion of MLPs in proxy groups for determination of gas pipeline ROEs |
| Southwest Gas Storage Company | 08/07 | Southwest Gas Storage Company | Docket No. RP07-541-000 | Return on Equity |
| Southwest Gas Storage Company | 06/07 | Southwest Gas Storage Company | Docket No. RP07-34-000 | Return on Equity |
| Sea Robin Pipeline LLC | 06/07 | Sea Robin Pipeline LLC | Docket No. RP07-513-000 | Return on Equity |
| Transwestern Pipeline Company | 09/06 | Transwestern Pipeline Company | Docket No. RP06-614-000 | Return on Equity |
| GPU International and Aquila | 11/00 | GPU International | Docket No. EC01-24-000 | Market Power Study |
| Georgia Public Service Commission |  |  |  |  |
| Atlanta Gas Light Company | 05/10 | Atlanta Gas Light Company | Docket No. 31647-U | Return on Equity |
| Hawaiian Public Utilities Commission |  |  |  |  |
| Hawaiian Electric Light Company | 08/12 | Hawaiian Electric Light Company | Docket No. 2012-0099 | Return on Equity |

Attachment A

| SPONSOR | Date | CASE/APPLICANT | Docket No. | Subject |
| :---: | :---: | :---: | :---: | :---: |
| Ilinois Commerce Commission |  |  |  |  |
| Ameren Illinois Company $\mathrm{d} / \mathrm{b} / \mathrm{a}$ Ameren Illinois | 02/11 | Ameren Illinois Company d/b/a Ameren Illinois | Docket No. 11-0279 | Return on Equity (electric) |
| Ameren Illinois Company d/b/a Ameren Illinois | 02/11 | Ameren Illinois Company d/b/a Ameren Illinois | Docket No. 11-0282 | Return on Equity (gas) |
| Indiana Utility Regulatory Commission |  |  |  |  |
| Northern Indiana Public Service Company | 05/09 | Northern Indiana Public Service Company | Cause No. 43894 |  |
| Maine Public Utilities Commission |  |  |  |  |
| Central Maine Power Company | 06/11 | Central Maine Power Company | Docket No. 2010-327 | Response to Bench Analysis provided by Commission Staff relating to the Company's credit and collections processes |
| Maryland Public Service Commission |  |  |  |  |
| Potomac Electric Power Company | 11/12 | Potomac Electric Power Company | Case No. 9311 | Return on Equity |
| Potomac Electric Power Company | 12/11 | Potomac Electric Power Company | Case No. 9286 | Return on Equity |
| Delmarva Power \& Light Company | 12/11 | Delmarva Power \& Light Company | Case No. 9285 | Return on Equity |
| Delmarva Power \& Light Company | 12/10 | Delmarva Power \& Light Company | Case No. 9249 | Return on Equity |
| Massachusetts Department of Public Utilities |  |  |  |  |
| Bay State Gas Company d/b/a Columbia Gas of Massachusetts | 04/12 | Bay State Gas Company d/b/a Columbia Gas of Massachusetts | DPU 12-25 | Capital Cost Recovery |
| National Grid | 08/09 | Massachusetts Electric Company d/b/a National Grid | DPU 09-39 | Revenue Decoupling and Return on Equity |
| National Grid | 08/09 | Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid | DPU 09-38 | Return on Equity - Solar Generation |
| Bay State Gas Company | 04/09 | Bay State Gas Company | DPU 09-30 | Return on Equity |
| NSTAR Electric | 09/04 | NSTAR Electric | DTE 04-85 | Divestiture of Power Purchase Agreement |

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| SPONSOR | Date | Case/ApPlicant | Docket No. | Subject |
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| NSTAR Electric | 08/04 | NSTAR Electric | DTE 04-78 | Divestiture of Power Purchase Agreement |
| NSTAR Electric | 07/04 | NSTAR Electric | DTE 04-68 | Divestiture of Power Purchase Agreement |
| NSTAR Electric | 07/04 | NSTAR Electric | DTE 04-61 | Divestiture of Power Purchase Agreement |
| NSTAR Electric | 06/04 | NSTAR Electric | DTE 04-60 | Divestiture of Power Purchase Agreement |
| Unitil Corporation | 01/04 | Fitchburg Gas and Electric | DTE 03-52 | Integrated Resource Plan; Gas Demand Forecast |
| Bay State Gas Company | 01/93 | Bay State Gas Company | DPU 93-14 | Divestiture of Shelf Registration |
| Bay State Gas Company | 01/91 | Bay State Gas Company | DPU 91-25 | Divestiture of Shelf Registration |
| Minnesota Public Utilities Commission |  |  |  |  |
| Xcel Energy, Inc. | 11/12 | Northern States Power Company | Docket No. E002/GR-12961 | Return on Equity |
| Otter Tail Power Corporation | 04/10 | Otter Tail Power Company | Docket No. E-017/GR-10239 | Return on Equity |
| Minnesota Power a division of ALLETE, Inc. | 11/09 | Minnesota Power | $\begin{array}{\|l} \hline \text { Docket No. E-015/GR-09- } \\ 1151 \\ \hline \end{array}$ | Return on Equity |
| CenterPoint Energy Resources Corp. d/b/a <br> CenterPoint Energy Minnesota Gas | 11/08 | CenterPoint Energy Minnesota Gas | Docket No. G-008/GR-081075 | Return on Equity |
| Otter Tail Power Corporation | 10/07 | Otter Tail Power Company | Docket No. E-017/GR-071178 | Return on Equity |
| Xcel Energy, Inc. | 11/05 | NSP-Minnesota | Docket No. E-002/GR-05- $1428$ | Return on Equity (electric) |
| Xcel Energy, Inc. | 09/04 | NSP Minnesota | Docket No. G-002/GR-041511 | Return on Equity (gas) |

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| Sponsor | Date | Case/APPLICANT | Docket No. | Subject |
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| Mississippi Public Service Commission |  |  |  |  |
| CenterPoint Energy Resources, Corp. d/b/a CenterPoint Energy Entex and CenterPoint Energy Mississippi Gas | 07/09 | CenterPoint Energy Mississippi Gas | Docket No. 09-UN-334 | Return on Equity |
| Missouri Public Service Commission |  |  |  |  |
| Laclede Gas Company | 12/12 | Laclede Gas Company | Case No. GR-2013-0171 | Return on Equity |
| Union Electric Company d/b/a Ameren Missouri | 02/12 | Union Electric Company d/b/a Ameren Missouri | Case No. ER-2012-0166 | Return on Equity (electric) |
| Union Electric Company d/b/a AmerenUE | 09/10 | Union Electric Company d/b/a AmerenUE | Case No. ER-2011-0028 | Return on Equity (electric) |
| Union Electric Company d/b/a AmerenUE | 06/10 | Union Electric Company d/b/a AmerenUE | Case No. GR-2010-0363 | Return on Equity (gas) |
| Montana Public Service Commission |  |  |  |  |
| Northwestern Corporation | 09/12 | Northwestern Corporation | Docket No. D2012.9.94 | Return on Equity (gas) |
| Nevada Public Utilities Commission |  |  |  |  |
| Southwest Gas Corporation | 04/12 | Southwest Gas Corporation | Docket No. 12-04005 | Return on Equity (gas) |
| Nevada Power Company | 06/11 | Nevada Power Company | Docket No. 11-06006 | Return on Equity (electric) |
| New Hampshire Public Utilities Commission |  |  |  |  |
| EnergyNorth Natural Gas d/b/a National Grid NH | 02/10 | EnergyNorth Natural Gas d/b/a National Grid NH | Docket No. DG 10-017 | Return on Equity |
| Unitil Energy Systems, Inc. ("Unitil"), EnergyNorth Natural Gas, Inc. d/b/a National Grid NH, Granite State Electric Company d/b/a National Grid, and Northern Utilities, Inc. - New Hampshire Division | 08/08 | Unitil Energy Systems, Inc. ("Unitil"), EnergyNorth Natural Gas, Inc. d/b/a National Grid NH, Granite State Electric Company d/b/a National Grid, and Northern Utilities, Inc. - New Hampshire Division | Docket No. DG 07-072 | Carrying Charge Rate on Cash Working Capital |
| New Jersey Board of Public Utilities |  |  |  |  |
| Atlantic City Electric Company | 08/11 | Atlantic City Electric Company | Docket No. ER11080469 | Return on Equity |


| SPONSOR | Date | Case/ApPlicant | Docket No. | Subject |
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| Pepco Holdings, Inc. | 09/06 | Atlantic City Electric Company | Docket No. EM06090638 | Divestiture and Valuation of Electric Generating Assets |
| Pepco Holdings, Inc. | 12/05 | Atlantic City Electric Company | Docket No. EM05121058 | Market Value of Electric Generation Assets; Auction |
| Conectiv | 06/03 | Atlantic City Electric Company | Docket No. EO03020091 | Market Value of Electric Generation Assets; Auction Process |
| New Mexico Public Regulation Commission |  |  |  |  |
| Southwestern Public Service Company | 02/11 | Southwestern Public Service Company | Case No. 10-00395-UT | Return on Equity (electric) |
| Public Service Company of New Mexico | 06/10 | Public Service Company of New Mexico | Case No. 10-00086-UT | Return on Equity (electric) |
| Public Service Company of New Mexico | 09/08 | Public Service Company of New Mexico | Case No. 08-00273-UT | Return on Equity (electric) |
| Xcel Energy, Inc. | 07/07 | Southwestern Public Service Company | Case No. 07-00319-UT | Return on Equity (electric) |
| New York State Public Service Commission |  |  |  |  |
| Consolidated Edison Company of New York, Inc. | 01/13 | Consolidated Edison Company of New York, Inc. | Case No. 13-E-0030 | Return on Equity (electric) |
| Niagara Mohawk Corporation d/b/a National Grid for Electric Service | 04/12 | Niagara Mohawk Corporation d/b/a National Grid for Electric Service | Case No. 12-E-0201 | Return on Equity (electric) |
| Niagara Mohawk Corporation d/b/a National Grid for Gas Service | 04/12 | Niagara Mohawk Corporation d/b/a National Grid for Gas Service | Case No. 12-G-0202 | Return on Equity (gas) |
| Orange and Rockland Utilities, Inc. | 07/11 | Orange and Rockland Utilities, Inc. | Case No. 11-E-0408 | Return on Equity (electric) |
| Orange and Rockland Utilities, Inc. | 07/10 | Orange and Rockland Utilities, Inc. | Case No. 10-E-0362 | Return on Equity (electric) |
| Consolidated Edison Company of New York, Inc. | 11/09 | Consolidated Edison Company of New York, Inc. | Case No. 09-G-0795 | Return on Equity (gas) |

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| Consolidated Edison Company of New York, Inc. | 11/09 | Consolidated Edison Company of New York, Inc. | Case No. 09-S-0794 | Return on Equity (steam) |
| Niagara Mohawk Power Corporation | 07/01 | Niagara Mohawk Power Corporation | Case No. 01-E-1046 | Power Purchase and Sale Agreement; Standard Offer Service Agreement |
| North Carolina Utilities Commission |  |  |  |  |
| Duke Energy Carolinas, LLC | 02/13 | Duke Energy Carolinas, LLC | Docket No. E-7, Sub 1026 | Return on Equity |
| Carolina Power \& Light Company d/b/a Progress Energy Carolinas, Inc. | 10/12 | Carolina Power \& Light Company d/b/a Progress Energy Carolinas, Inc. | Docket No. E-2, Sub 1023 | Return on Equity |
| Dominion North Carolina Power | 03/12 | Dominion Resources | Docket No. E-22, Sub 479 | Return on Equity (electric) |
| Duke Energy Carolinas, LLC | 07/11 | Duke Energy Carolinas, LLC | Docket No. E-7, Sub 989 | Return on Equity (electric) |
| North Dakota Public Service Commission |  |  |  |  |
| Otter Tail Power Company | 11/08 | Otter Tail Power Company | Docket No. 08-862 | Return on Equity (electric) |
| Oklahoma Corporation Commission |  |  |  |  |
| Oklahoma Gas \& Electric Company | 07/11 | Oklahoma Gas \& Electric Company | Cause No. PUD201100087 | Return on Equity |
| CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Oklahoma Gas | 03/09 | CenterPoint Energy Oklahoma Gas | Cause No. PUD200900055 | Return on Equity |
| Rhode Island Public Utilities Commission |  |  |  |  |
| The Narragansett Electric Company d/b/a National Grid | 04/12 | The Narragansett Electric Company d/b/a National Grid | Docket No. 4323 | Return on Equity (electric \& gas) |
| National Grid RI - Gas | 08/08 | National Grid RI - Gas | Docket No. 3943 | Revenue Decoupling and Return on Equity |
| South Carolina Public Service Commission |  |  |  |  |
| South Carolina Electric \& Gas | 10/12 | South Carolina Electric \& Gas | Docket No. 2012-218-E | Return on Equity |
| Duke Energy Carolinas, LLC | 08/11 | Duke Energy Carolinas, LLC | Docket No. 2011-271-E | Return on Equity |
| South Carolina Electric \& Gas | 03/10 | South Carolina Electric \& Gas | Docket No. 2009-489-E | Return on Equity |

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| :---: | :---: | :---: | :---: | :---: |
| South Dakota Public Utilities Commission |  |  |  |  |
| Otter Tail Power Company | 08/10 | Otter Tail Power Company | Docket No. EL10-011 | Return on Equity (electric) |
| Northern States Power Company | 06/09 | South Dakota Division of Northern States Power | Docket No. EL09-009 | Return on Equity (electric) |
| Otter Tail Power Company | 10/08 | Otter Tail Power Company | Docket No. EL08-030 | Return on Equity (electric) |
| Texas Public Utility Commission |  |  |  |  |
| Wind Energy Texas Transmission, LLC | 08/12 | Wind Energy Texas Transmission, LLC | Docket No. 40606 | Return on Equity |
| Southwestern Electric Power Company | 07/12 | Southwestern Electric Power Company | Docket No. 40443 | Return on Equity |
| Oncor Electric Delivery Company, LLC | 01/11 | Oncor Electric Delivery Company, LLC | Docket No. 38929 | Return on Equity |
| Texas-New Mexico Power Company | 08/10 | Texas-New Mexico Power Company | Docket No. 38480 | Return on Equity (electric) |
| CenterPoint Energy Houston Electric LLC | 06/10 | CenterPoint Energy Houston Electric LLC | Docket No. 38339 | Return on Equity |
| Xcel Energy, Inc. | 05/10 | Southwestern Public Service Company | Docket No. 38147 | Return on Equity (electric) |
| Texas-New Mexico Power Company | 08/08 | Texas-New Mexico Power Company | Docket No. 36025 | Return on Equity (electric) |
| Xcel Energy, Inc. | 05/06 | Southwestern Public Service Company | Docket No. 32766 | Return on Equity (electric) |
| Texas Railroad Commission |  |  |  |  |
| CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas | 07/12 | CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas | GUD 10182 | Return on Equity |
| Atmos Energy Corporation - West Texas Division | 06/12 | Atmos Energy Corporation - West Texas Division | GUD 10175 | Return on Equity |
| Atmos Energy Corporation - MidTexas Division | 06/12 | Atmos Energy Corporation - MidTexas Division | GUD 10171 | Return on Equity |


| SPONSOR | Date | CASE/APPLICANT | DOCKET NO. | Subject |
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| CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas | 12/10 | CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas | GUD 10038 | Return on Equity |
| Atmos Pipeline - Texas | 09/10 | Atmos Pipeline - Texas | GUD 10000 | Return on Equity |
| CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas | 07/09 | CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Entex and CenterPoint Energy Texas Gas | GUD 9902 | Return on Equity |
| CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Texas Gas | 03/08 | CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Texas Gas | GUD 9791 | Return on Equity |
| Utah Public Service Commission |  |  |  |  |
| Questar Gas Company | 12/07 | Questar Gas Company | Docket No. 07-057-13 | Return on Equity |
| Vermont Public Service Board |  |  |  |  |
| Central Vermont Public Service Corporation; Green Mountain Power | 02/12 | Central Vermont Public Service Corporation; Green Mountain Power | Docket No. 7770 | Merger Policy |
| Central Vermont Public Service Corporation | 12/10 | Central Vermont Public Service Corporation | Docket No. 7627 | Return on Equity (electric) |
| Green Mountain Power | 04/06 | Green Mountain Power | Docket Nos. 7175 and 7176 | Return on Equity (electric) |
| Vermont Gas Systems, Inc. | 12/05 | Vermont Gas Systems | Docket Nos. 7109 and 7160 | Return on Equity (gas) |
| Virginia State Corporation Commission |  |  |  |  |
| Columbia Gas Of Virginia, Inc. | 06/06 | Columbia Gas Of Virginia, Inc. | Case No. PUE-2005-00098 | Merger Synergies |
| Dominion Resources | 10/01 | Virginia Electric and Power Company | Case No. PUE000584 | Corporate Structure and Electric Generation Strategy |
| Virginia Natural Gas, Inc. | 02/11 | Virginia Natural Gas, Inc. | Case No. PUE-2010-0014 | Capital Structure |


[^0]:    2 See Bluefield Waterworks \& Improvement Co. v. Public Service Comm'n of West Virginia, 262 U.S. 679 (1923); See also Federal Power Comm'n v. Hope Natural Gas Co., 320 U.S. 591, 603 (1944).

[^1]:    3 Bluefield Water Works and Improvement Co. v. Public Service Comm'n of West Virginia, 262 U.S. 679, 692 (1923).

[^2]:    Federal Power Comm'n v. Hope Natural Gas Co., 320 U.S. 591, 603 (1944.

[^3]:    5 Order NO. PSC 09-0283-FOF-EI, Docket NO. 080317-EI, at 48.

[^4]:    6 See Section VIII, and Document No. 10.

[^5]:    10 See Edison International, 2009 SEC Form $10-\mathrm{K}$, at 129. See Edison International, 2011 SEC Form 10-K, at 53. Ibid., at 54.
    See SNL Financial, "Edison Mission files Chapter 11 reorganization plan," December 17, 2012.

[^6]:    13 See Integrys, 2009 SEC Form 10~K, at 35

[^7]:    20
    See Blue Chip Financial Forecasts, Vol. 32, No. 2, February 1, 2013, at 2. Consensus projections of the 30 -year Treasury yield for the six quarters ending December 2013. See Blue Chip Financial Forecasts, Vol. 31, No. 12, December 1, 2012, at 14. Consensus projections of the 30 -year Treasury yield for the period $2014-2023$.

[^8]:    ${ }^{22}$ The Sharpe Ratio is relied upon by financial professionals to assess the incremental return received for holding a risky (i.e., more volatile) asset rather than a riskfree (i.e., less volatile) asset. Risk is measured by the standard deviation of returns. That is, the higher the volatility of returns, the greater the risk.

[^9]:    27 The Equity Risk Premium is defined as the incremental return that an equity investment provides over a risk-free rate.

[^10]:    32 Standard \& Poor's, U.S. Utilities' Capital Spending Is Rising, And Cost-Recovery Is

[^11]:    36
    Shannon P. Pratt, Roger J. Grabowski, Cost of Capital: Applications and Examples, $4^{\text {th }}$ ed. (John Wiley \& Sons, Inc., 2010), at 586.

[^12]:    37 See Roger A. Morin, New Regulatory Finance, Public Utility Reports, Inc., 2006, at 323-324 [Clarification added]. Ibid., at 324.
    Order No. PSC 12-0179-FOF-EI, Docket No. 110138-EI, at 51.

[^13]:    41
    See, for example, Treasurys Slide After Lackluster Sale, The wall Street Journal, August 8, 2012.
    42 On September 13, 2012 the Federal Reserve announced that, in addition to continuing the maturity extension program announced in June, they would also begin buying mortgage-backed securities at a pace of $\$ 40$ billion per month. See Federal Reserve Press Release, dated September 13, 2012.

[^14]:    44 Minutes of the Federal Open Market Committee June 19-20, 2012, at 4.

[^15]:    The minimum maturity for the bonds in this index is 20 years, with an average of 30 years. Moody's Long-Term Corporate Bond Yield Averages are derived from pricing data on a regularly replenished population of nearly 100 seasoned corporate bonds in the U.S. market, each with current outstandings over $\$ 100$ million. The bonds have maturities as close as possible to 30 years, they are dropped from the list if their remaining life falls below 20 years, if they are susceptible to redemption, or if their ratings change. All yields are yield-to- maturity calculated on a semi-annual basis. Each observation is an unweighted average, with Average Corporate yields representing the unweighted average of the corresponding Average Industrial and Average Public Utility observations. See Bloomberg.com.

[^16]:    49 That is to say that on average, the 30 -year Treasury yield exceeded the electric utility dividend yield by 58 basis points.

[^17]:    Denning, Liam, A Short Circuit in the Stock Market, The Wall Street Journal, October 23, 2009, at clo. I note that while this article referred to ten-year Treasury yields, the fundamental conclusion, that the utility yield spread has deviated from its long-term relationship, remains.

[^18]:    See Roger A. Morin, New Regulatory Finance, Public Utility Reports, Inc., 2006, at 4546.

[^19]:    54 New England Telephone \& Telegraph Co. v. State, 97 A.2d 213, 220 (N.H. 1953) (citing New England Tel. \& Tel. Co. v. Department of Pub. Util., 97 N.E. 2d 509, 514 (Mass. 1951) and Petitions of New England Tel. \& Tel. Co., 80 A.2d 671 (Vt. 1953)).

[^20]:    55
    Communications Satellite Corp. v. FCC, 611 F.2d 883, 904 (D.C. Cir. 1977).

[^21]:    FILED: 04/05/2013 WITNESS: HEVERT
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[^23]:    EXHIBIT NO
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