Exhibit No.:

Issue:

Rate of Return

Witness:

Christopher C. Walters, CFA

Type of Exhibit:

Direct Testimony

Sponsoring Party:

Missouri Industrial Energy Consumers

Case No.:

ER-2019-0335

Date Testimony Prepared:

December 4, 2019

FILED March 19, 2020 Data Center Missouri Public

BEFORE THE PUBLIC SERVICE COMMISSION Service Commission OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service.

Case No. ER-2019-0335

Direct Testimony and Schedules of

Christopher C. Walters, CFA

On behalf of

Missouri Industrial Energy Consumers

December 4, 2019



BRUBAKER & ASSOCIATES, INC.

Project 10842

MISC Exhibit No. 452 Date 3/4/20 Reporter Ship File No. ER-209- 6335

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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STATE OF N)))	SS			
		Affida	vit of Christo	pher C. W	<u>alters</u>	
Christ	opher C. Wa	ters, beir	ng first duly sw	orn, on his o	eath states:	
	s principal pla 17. We have	ce of bus been re	siness at 16690	Swingley R	sultant with Brubaker of idge Road, Suite 140, dustrial Energy Const	Chesterfield,
	s which were	e prepare		orm for intro	purposes are my dire	
3.	I hereby sw	ear and	affirm that the	testimony a	nd schedules are true	and correct

Subscribed and sworn to before me this 4th day of December, 2019.

and that they show the matters and things that they purport to show.

TAMMY S. KLOSSNER
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County
My Commission Expires: Mar. 18, 2023
Commission # 15024862

Notary Rublic

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service.

Case No. ER-2019-0335

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Decrease Its Revenues for Electric Service.

Case No. ER-2019-0335

Direct Testimony of Christopher C. Walters

	I. INTRODUCTION
Q	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
Α	Christopher C. Walters. My business address is 16690 Swingley Ridge Road,
	Suite 140, Chesterfield, MO 63017.
Q	WHAT IS YOUR OCCUPATION?
Α	I am a Senior Consultant in the field of public utility regulation with the firm of Brubaker
	& Associates, Inc. ("BAI"), energy, economic and regulatory consultants.
Q	PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.
Α	This information is included in Appendix A to this testimony.
Q	HAVE YOU EVER TESTIFIED BEFORE A REGULATORY BODY?
Α	Yes. I have sponsored pre-filed written testimony in over 30 dockets in front of 17
	different regulatory bodies including 16 states, the Federal Energy Regulatory
	Commission ("FERC"), and the City Council of New Orleans. A list detailing each of
	these is attached hereto as my Schedule CCW-1.
	A Q A Q

Q ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

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This testimony is presented on behalf of the Missouri Industrial Energy Consumers

("MIEC"), a non-profit corporation that represents the interests of large customers in

Missouri utility matters. These companies purchase substantial quantities of electricity

from Ameren Missouri and the outcome of this proceeding will have an impact on their

cost of electricity.

7 Q WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

My testimony will address the current market cost of equity, and resulting overall rate of return for Ameren Missouri (or "Company"). In my analyses, I consider the results of several market models, the current and expected economic environment, as well as the outlook for the regulated utility industry. In addition, I also take into consideration economic and legislative events that have taken place since Ameren Missouri's last litigated rate case in which a return on equity ("ROE") was awarded by this Commission.

My silence with respect to any position taken by Ameren Missouri in its application or direct testimony in this proceeding should not be interpreted as an endorsement of that position.

18 <u>II. SUMMARY</u>

PLEASE SUMMARIZE YOUR RECOMMENDATIONS AND CONCLUSIONS.

In Section III of my testimony, I review and analyze the regulated utility industry's access to capital, credit rating trends and outlooks, as well as the overall trend in the authorized ROE for utilities throughout the country. I conclude that the trend in authorized ROEs for utilities has declined over the last several years and has remained

well below 10.0% more recently. I also review the impact that the Federal Reserve's monetary policy actions have had on the cost of capital.

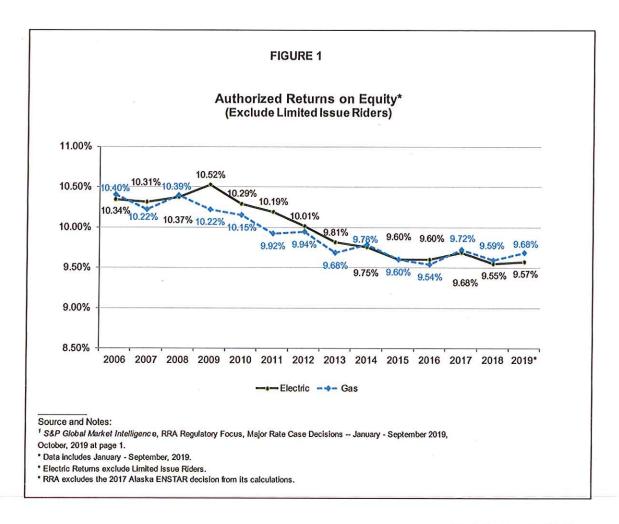
In Section IV of my testimony, I outline how a fair ROE should be established, provide an overview of the market's perception of Ameren Missouri's investment risk, comment on the Company's proposed capital structure, and present the analyses I relied on to estimate an appropriate ROE for Ameren Missouri. Based on the results of several cost of equity estimation methods performed on publicly traded electric utility companies with comparable risk to the Company, I recommend the Commission award Ameren Missouri a return on common equity of 9.2%, which is the approximate midpoint of my recommended range of 8.8% to 9.5%. This ROE will fairly compensate Ameren Missouri for its current market cost of common equity by fairly balancing the interests of investors and ratepayers.

In Section V of my testimony, I review changes in the economic environment, as well as certain legislative changes since Ameren Missouri's last litigated rate case (ER-2014-0258) where its most recent stated authorized ROE of 9.53% was determined by this Commission. I use these observations to further assess the reasonableness of my recommendations.

III. ACCESS TO CAPITAL AND ECONOMIC ENVIRONMENT

2 III.A. Electric Industry Authorized ROEs,
3 Access to Capital, and Credit Strength

- 4 Q **PLEASE** DESCRIBE **OBSERVABLE** THE EVIDENCE ON IN **TRENDS** 5 AUTHORIZED ROEs FOR ELECTRIC AND GAS UTILITIES, UTILITIES' CREDIT 6 STANDING, AND UTILITIES' ACCESS TO CAPITAL TO FUND INFRASTRUCTURE 7 INVESTMENT. Authorized ROEs for both electric and gas utilities have declined over the last ten years, 8 Α
- A Authorized ROEs for both electric and gas utilities have declined over the last ten years,
 as illustrated in Figure 1, and have been reasonably stable well below 10.0% for about
 the last six years.



1 Q PLEASE DESCRIBE THE DISTRIBUTION OF AUTHORIZED ROES FOR THE LAST

2 FEW YEARS.

3 A The distribution of authorized returns, annually, since 2016 is summarized in Table 1.

		TABLE	1		
		Distribution of Auth (All Electric U			
<u>Line</u>	<u>Year</u>	Average (1)	Median (2)	Share of Decisions ≤ 9.5% (3)	Share of Decisions $\leq 9.7\%$ (4)
1	2016	9.60%	9.60%	41%	53%
2	2017 ¹	9.67%	9.60%	42%	67%
3	2018 ²	9.54%	9.57%	47%	63%
4	2019 Q3	9.60%	9.60%	35%	59%
<u> </u>	vurce and Notes:				

Source and Notes:

The distribution shows that over the last few years, the majority of authorized ROEs since 2016 have been below 9.7%, with a significant portion of those being below 9.5%.

S&P Global Market Intelligence, downloaded 10/2/2019.

¹Includes authorized base ROE of 9.4% for Nevada Power Company, which excludes incentives associated with the Lenzie facility.

²Includes authorized base ROE of 9.6% for Interstate Power & Light Co., which exludes allowed ROE for generating facilities subject to special ratemaking principles.

^{*}Excludes Limited Issue Rider Cases.

HOW HAS THE AUTHORIZED COMMON EQUITY RATIO FLUCTUATED OVER

THE SAME TIME PERIOD FOR ELECTRIC UTILITIES?

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In general, the electric utility industry's common equity ratio has not really deviated too much from 50.0%. As shown in Table 2, I have provided the authorized common equity ratios for electric utilities around the country, excluding the reported common equity ratios for Arkansas, Florida, Michigan, and Indiana. I have excluded the reported common equity ratios for these states because these jurisdictions include sources of capital outside of investor-supplied capital such as accumulated deferred income taxes. As such, the reported common equity ratios in these states would bias down the reported permanent common equity ratios authorized for ratemaking purposes.

TABLE 2

<u>Trends in State Authorized Common Equity Ratios</u>
(Industry)

		Elect	ric ^{1,2}
<u>Line</u>	<u>Year</u> (1)	Average (2)	<u>Median</u> (3)
1	2016	49.70%	49.99%
2	2017	50.02%	49.85%
3	2018	50.60%	50.23%
4	2019	<u>51.75%</u>	<u>51.37%</u>
5	Average	50.52%	50.36%
6	Min	49.70%	49.85%
7	Max	51.75%	51.37%

Sources and Note:

¹S&P Global Market Intelligence, downloaded 10/2/2019.

²Data through 3Q 2019. Excludes Arkansas, Florida, Indiana and Michigan because they include non-investor capital.

Q HOW HAS THE CREDIT RATING OF THE ELECTRIC UTILITY INDUSTRY CHANGED OVER THE LAST SEVERAL YEARS?

Α

The credit rating changes for the electric utility industry over the last several years are the result of marked improvement in overall financial health and credit quality as shown in Table 3. As shown in this table, in 2008, 69% of the electric utility industry was rated from BBB- to BBB+, 18% had a bond rating better than BBB+, and approximately 13% of the industry was below investment grade.

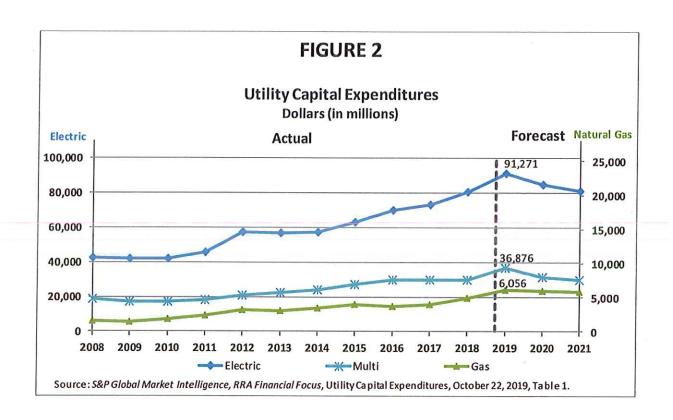
The overall industry rating improved steadily over the subsequent eight years. By 2016, none of the industry was below investment grade, and approximately 70% were BBB+ or stronger. Overall, the improvement in the electric utility industry's overall credit quality has been quite significant.

			S&P F	Ratings (Year	by Cate <u>End)</u>	gory					
	2008	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	2014	<u>2015</u>	<u> 2016</u>	<u>2017</u>	2018
Regulated											
A or higher	8%	7%	9%	8%	6%	3%	3%	3%	6%	6%	3%
A-	10%	15%	14%	14%	17%	20%	21%	22%	28%	34%	32%
BBB+	23%	22%	17%	19%	14%	17%	32%	33%	36%	29%	32%
BBB	23%	27%	31%	35%	36%	49%	37%	33%	22%	20%	21%
BBB-	23%	20%	17%	14%	17%	6%	3%	3%	8%	11%	12%
Below BBB-	<u>13%</u>	10%	11%	11%	11%	6%	5%	6%	<u>0%</u>	<u>0%</u>	0%
Total	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

1	Q	HAVE UTILITIES BEEN ABLE TO ACCESS EXTERNAL CAPITAL TO SUPPORT
2		INFRASTRUCTURE CAPITAL PROGRAMS?
3	Α	Yes. In its October 22, 2019 Utility Capital Expenditures Update report, RRA
4		Financial Focus, a division of S&P Global Market Intelligence, made several relevant
5		comments about utility investments generally:
6 7 8 9		 Projected 2019 capital expenditures for the 48 gas and electric utilities in the Regulatory Research Associates', a group with S&P Global Market Intelligence, universe currently stands at roughly \$134.2 billion, a step ahead of the prior forecast of \$131.1 billion from spring 2019.
10 11 12 13		 Energy utility capex projections for future years increased modestly from our previous analysis as well, rising to \$121.6 billion for 2020. We anticipate both the 2020 and 2021 forecasts will continue to increase as companies' plans for future projects solidify and new opportunities arise.
14 15 16 17		 For the first half of 2019, energy utility capex totaled \$55.3 billion, in line with total investment in the first half of the previous year. Energy utility capex in 2018 totaled \$115.4 billion, a record high for the 48-utility group and 8% above 2017 energy utility investment spending.
18 19 20 21 22 23 24		 Across the small investor-owned water utility sector, total capex grew 8% year over year to \$2.8 million in 2018. American Water, which represents over 55% of the sector's capex, experienced a year-over- year growth in capex spending of 10.6%. Total-sector capex growth is expected to increase 3.8% in 2019, excluding the additional investment Aqua America is going to put in People's Natural Gas once the transaction is completed.¹
25		Regulated utility companies have accessed significant amounts of capital to support
26		substantial capital investments over at least the last ten years. As shown in Figure 2,
27		capital expenditures for electric and natural gas utilities have increased considerably
28		over the period 2007 into 2019, and the forecasted capital expenditures remain

elevated, but slightly below current levels.

¹S&P Global Market Intelligence, RRA Financial Focus: "Utility Capital Expenditures Update," October 22, 2019.



IS THERE EVIDENCE OF ROBUST VALUATIONS OF REGULATED UTILITY

EQUITY SECURITIES?

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Yes. Robust valuations are an indication that utilities can sell securities at high prices, which is a strong indication that they can access equity capital under reasonable terms and conditions, and at relatively low cost. As shown on Schedule CCW-2, the historical valuation of electric utilities followed by *Value Line*, based on a price-to-earnings ("P/E") ratio, price-to-cash flow ("P/CF") ratio, and market price-to-book value ("M/B") ratio, indicates utility security valuations today are very strong and robust relative to the last several years. These strong valuations of utility stocks indicate that utilities have access to equity capital under reasonable terms and at lower costs.

1	Q	HOW SHOULD THE COMMISSION USE THIS MARKET INFORMATION IN
2		ASSESSING A FAIR RETURN FOR AMEREN MISSOURI?
3	Α	Observable market evidence is quite clear that capital market costs are near historically
4		low levels. While authorized ROEs have fallen to the mid 9.0% range, utilities continue
5		to have access to large amounts of external capital even as they are funding large
6		capital programs. Furthermore, utilities' investment-grade credit ratings are mostly
7		stable and have improved due, in part, to supportive regulatory treatment. The
8		Commission should carefully weigh all this important observable market evidence in
9		assessing a fair ROE for Ameren Missouri.
10	III.B.	Regulated Utility Industry Outlook
11	Q	PLEASE DESCRIBE THE CREDIT RATING OUTLOOK FOR REGULATED
12		UTILITIES.
13	Α	As discussed above and expanded upon here, regulated utilities' credit ratings have
14		improved over the last few years. Credit analysts have observed that utilities have
15		strong access to capital at attractive pricing (i.e., low capital costs), which has
16		supported very large capital programs.
17		Standard & Poor's ("S&P") recently published a report titled "Industry Top
18		Trends 2019: North America Regulated Utilities." In that report, S&P noted the
19		following:
20 21 22 23		 Ratings Outlook: Rating trends across regulated electric, gas, and water utilities in North America remain mostly stable, reflecting generally supportive regulatory oversight. However, the industry's financial measures weakened in 2018 as a result of U.S. tax reform, robust

capital spending, and flat to slightly negative load growth. In general, those utilities most affected by these developments were those who

strategically operate with a minimal financial cushion at their current

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rating.

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2 3 4 5 6 7 8 9	- Industry Trends: The North America utility industry is mostly stable with some downside ratings exposure. Weaker credit measures from tax reform will likely persist in 2019, reflecting tax-related rate reductions carryovers. However, we expect that some utilities will offset this reduced revenue with further equity infusions or asset sales. Other developing trends include rising interest rates, inflation, technology, climate change, and regulatory lag, which could further stress the industry's credit quality. ²
10	In a recent report Fitch states:
11 12 13 14 15 16 17 18	The Tax Cuts and Jobs Act signed into law on Dec. 22, 2017 has negative credit implications for U.S. regulated utilities and utility holding companies over the short-to-medium term, according to Fitch Ratings. A reduction in customer bills to reflect lower federal income taxes and return of excess accumulated deferred income taxes is expected to lower revenues and funds from operations (FFO) across the sector. Absent mitigating strategies on the regulatory front, this is expected to lead to weaker credit metrics and negative rating actions for those issuers that have limited headroom to absorb the leverage creep.
20	* * *
21 22 23 24 25 26 27 28 29	Over a longer-term perspective, <u>Fitch views tax reform as modestly positive for utilities</u> . The sector retained the deductibility of interest expense, which would have otherwise significantly impacted cost of capital for this capital intensive sector. The exemption from 100% capex expensing is also welcome news for the sector, which has seen years of bonus depreciation reduce rate base leading to lower earnings. Finally, the reduction in federal income taxes lowers cost of service to customers, providing utilities headroom to increase rates for capital investments. ³
30	Moody's previously did place the industry on "Negative" outlook to reflect the
31	uncertainty and short-term cash flow impacts primarily as a result of the change in
32	federal tax law, but also the large capital program for the industry. However, Moody's

in its November 7, 2019 report. Specifically, Moody's stated the following:

has since revised its outlook for the regulated utility industry to "stable" from "negative"

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²S&P Global Ratings: "Industry Top Trends 2019: North America Regulated Utilities,"

November 8, 2018, at 1 (emphasis added).

3Fitch Ratings: "Tax Reform Creates Near-term Credit Pressure for U.S. Utilities," January 24, 2018 (emphasis added).

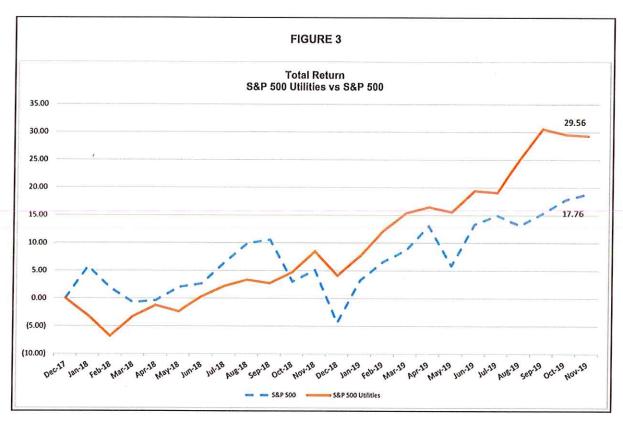
Α

We are changing our outlook for the US regulated utility sector to stable from negative as the industry's funds from operations (FFO)-to-debt ratio stabilizes. The implementation of more proactive regulatory and financial actions, along with savings mainly related to tax credits, tax deductions and net operating losses (NOLs), are helping to buoy the sector's cash flows following US tax reform.⁴

8 Q IS THERE REASON TO BELIEVE THAT THE CHANGE IN FEDERAL TAX LAW 9 WILL INCREASE UTILITIES' COST OF EQUITY GOING FORWARD?

It is unlikely. For some utilities, the Tax Cuts and Jobs Act ("TCJA") will have an impact on cash flows, depending on whether or not they have addressed the return of the excess accumulated deferred income taxes to customers in their regulated jurisdictions. There may be some utilities whose credit metrics are marginal to support their existing credit ratings and were, or are, subject to a slight downgrade as a result of the TCJA. The impact on cash flows, however, is not likely to be significant enough to threaten the credit standing of, or increase the cost of equity capital for, the industry in general on a going forward basis. As shown in Figure 3, the S&P 500 Utilities index has outperformed the broader market as measured by the S&P 500 by a significant margin since December 2017 when the TCJA was signed into law.

⁴Moody's Investors Service: "Outlook: Regulated electric and gas utilities - US, 2020 outlook moves to stable on supportive regulation, weaker but steady credit metrics," November 7, 2019 at 3. (emphasis added).



Given the period of time that has passed since the passage of the TCJA and the outperformance of the utilities sector, it is reasonable to conclude that investors have fully contemplated the effect of the TCJA on utilities and do not expect an increase in the cost of capital as a result of the TCJA going forward.

III.C. Federal Reserve Monetary Policy

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- 6 Q HAVE YOU CONSIDERED THE CONSENSUS OUTLOOKS OF INDEPENDENT
 7 ECONOMISTS FOR CHANGES IN INTEREST RATES IN FORMING YOUR
 8 RECOMMENDED ROE IN THIS CASE?
- Yes. The consensus of independent economists indicates that they are expecting the
 Federal Reserve's monetary policy actions, as directed by the Federal Open Market

Committee ("FOMC"),⁵ will keep the Federal Funds Rate flat to slightly declining over the near term. This is evident from a comparison of current and forecasted changes in the Federal Funds Rate as shown in Table 4. Similarly, the consensus for <u>long-term</u> interest rates, reflected in the rate for 30-year Treasury Bonds, is also largely expected to remain flat to slightly declining to a level near 2.5% through the first quarter of 2021.

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TABLE 4 Blue Chip Financial Forecasts Projected Federal Funds Rate, 30-Year Treasury Bond Yields, and GDP Price Index **1Q** 2Q 3Q 4Q **1Q** 2Q 3Q 4Q **1Q Publication Date** 2019 2019 2019 2019 2020 2020 <u>2020</u> **2020** <u>2021</u> Federal Funds Rate Jun-19 2.4 2.4 2.4 2.4 2.4 2.4 2.3 Jul-19 2.4 2.2 2.0 1.9 1.9 1.8 1.8 Aug-19 2.4 2.2 2.0 1.9 1.8 1.8 1.8 Sep-19 2.4 2.1 1.8 1.7 1.6 1.6 1.6 Oct-19 2.3 1.5 1.4 1.8 1.6 1.5 1.5 Nov-19 2.2 1.7 1.5 1.5 1.4 1.4 1.4 T-Bond, 30 yr. Jun-19 3.0 2.9 3.0 3.0 3.1 3.1 3.1 Jul-19 2.8 2.6 2.6 2.7 2.7 2.8 2.8 2.7 Aug-19 2.8 2.6 2.6 2.6 2.7 2.7 Sep-19 2.8 2.3 2.2 2.3 2.4 2.5 2.6 Oct-19 2.5 2.3 2.1 2.2 2.2 2.3 2.4 Nov-19 2.3 2.1 2.2 2.2 2.3 2.4 2.5 **GDP Price Index** Jun-19 0.9 2.4 2.1 2.1 2.1 2.1 2.1 Jul-19 2.3 2.0 2.0 2.1 2.1 2.0 2.0 Aug-19 2.4 2.0 2.0 2.0 2.1 2.1 2.0 Sep-19 2.4 2.1 2.1 2.1 2.0 2.1 2.1 2.0 Oct-19 2.1 2.0 2.0 2.0 2.1 2.0 2.0 2.1 2.0 2.0 Nov-19 1.7 2.0 2.0 Source and Note: Blue Chip Financial Forecasts, June through November 2019. Actual Yields in Bold

⁵The FOMC is the monetary policymaking body of the Federal Reserve.

1	Q	WILL YOU PLEASE BRIEFLY DESCRIBE RECENT MONETARY POLICY ACTIONS
2		TAKEN BY THE FEDERAL RESERVE?
3	Α	Yes. Prior to cutting rates in August 2019, the Federal Reserve had been implementing
4		a "normalization" monetary policy by taking what is known as tightening actions since
5		December 2015 when it started raising the target Federal Funds Rate. Such
6		normalization or tightening actions included raising the Federal Funds Rate and
7		reducing its securities holdings on its balance sheet. In August 2019, the FOMC voted
8		to reduce the target Federal Funds Rate by 25 basis points and end the planned
9		reduction of its securities holdings on its balance sheet. The Federal Funds Rate has
10		been cut an additional two times.
11	Q	PRIOR TO ITS RECENT ACTIONS, IS THERE EVIDENCE THAT THE FEDERAL
12		RESERVE'S NORMALIZATION POLICY HAD MINIMAL IMPACT ON LONG-TERM
13		RATES?
14	Α	Yes. Prior to lowering the short-term rate in August, the Federal Reserve had raised
15		the Federal Funds Rate nine times since December 2015, raising the short-end of the
16		yield curve. However, comparable increases for longer maturity bonds have not been

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As shown in Figure 4, the actions taken by the Federal Reserve to increase the Federal Funds Rate have simply flattened the yield curve and did not result in a corresponding increase in long-term interest rates. This is significant because the cost of common equity is impacted by long-term interest rates, not short-term interest rates.

1	Q	DO YOU BELIEVE THAT MARKET PARTICIPANTS AND THE CONSENSUS OF
2		INDEPENDENT ECONOMISTS REFLECT ALL RELEVANT FACTORS IN FORMING
3		THEIR INTEREST RATE PROJECTIONS?
4	Α	Yes. Because the Federal Reserve's actions are well followed by market participants
5		and captured in independent economists' outlooks for changes in capital market costs,
6		the Federal Reserve's actions, along with all other relevant factors, are considered by
7		economists in forming their outlooks for changes in interest rates and capital market
8		conditions.
9		As such, this well-informed outlook for changes in interest rates is certainly
10		relevant in assessing whether or not the current low-cost capital market costs are
11		expected to prevail or change over time.
12		IV. RETURN ON EQUITY
13	Q	PLEASE DESCRIBE WHAT IS MEANT BY A "UTILITY'S COST OF COMMON
14		EQUITY."
15	Α	A utility's cost of common equity is the expected return that investors require on an
16		investment in the utility. Investors expect to earn their required return by receiving
17		dividends and through stock price appreciation.
18	Q	PLEASE DESCRIBE THE FRAMEWORK FOR DETERMINING A REGULATED
19		UTILITY'S COST OF COMMON EQUITY.
20	Α	In general, determining a fair cost of common equity for a regulated utility has been
21		framed by two hallmark decisions of the U.S. Supreme Court: Bluefield Water Works
22		& Improvement Co. v. Pub. Serv. Comm'n of W. Va., 262 U.S. 679 (1923) and Fed.
23		Power Comm'n v. Hope Natural Gas Co., 320 U.S. 591 (1944).

These decisions identify the general financial and economic standards to be
considered in establishing the cost of common equity for a public utility. Those general
standards provide that the authorized return should: (1) be sufficient to maintain
financial integrity; (2) attract capital under reasonable terms; and (3) be commensurate
with returns investors could earn by investing in other enterprises of comparable risk.

6 Q PLEASE DESCRIBE THE METHODS YOU HAVE USED TO ESTIMATE AMEREN 7 MISSOURI'S COST OF COMMON EQUITY.

I have used several models based on financial theory to estimate Ameren Missouri's cost of common equity. These models are: (1) a constant growth Discounted Cash Flow ("DCF") model using the consensus of analysts' growth rate projections; (2) a constant growth DCF using sustainable growth rate estimates; (3) a multi-stage DCF model; (4) a Risk Premium model; and (5) a Capital Asset Pricing Model ("CAPM"). I have applied these models to a group of publicly traded utilities with investment risk similar to Ameren Missouri.

IV.A. Ameren Missouri's Investment Risk

Α

16 Q PLEASE DESCRIBE THE MARKET'S ASSESSMENT OF THE INVESTMENT RISK 17 OF AMEREN MISSOURI.

A The market's assessment of Ameren Missouri's investment risk is described by credit rating analysts' reports. Ameren Missouri's current corporate bond ratings from S&P and Moody's are BBB+ and Baa1, respectively.⁶ It should be noted that Ameren Missouri's rating from S&P reflects a one-notch downgrade from its stand-alone credit

⁶S&P Global Market Intelligence, October 17, 2019.

profile ("SACP") rating of A-. The one notch downgrade is the result of S&P group rating methodology and Ameren Missouri's association with its parent company, Ameren Corporation. In other words, Ameren Missouri's rating from S&P would be A-if not for Ameren Corporation's BBB+ rating. The Company's outlook from both S&P and Moody's is "Stable." Prior to upgrading Ameren Missouri, in its most recent report on Ameren Missouri, S&P specifically stated:

Outlook

S&P Global Ratings' stable rating outlook on AM reflects that on parent Ameren Corp. and incorporates our base-case scenario that Ameren's adjusted funds from operations (FFO) to debt will average about 15% for 2019 through 2022. Fundamental to our forecast is our expectation that the company will continue to manage its regulatory risk, enabling some of the regulated companies to earn their allowed return on equity. We also expect that the company will continue to fund its capital spending initiatives in a credit-supportive manner.

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Business Risk: Excellent

Our assessment of AM's business risk profile reflects the utility's very low-risk, rate-regulated electric and natural gas distribution operations providing essential services that are strategically important to economies, have material barriers to entry, and essentially operate insulated from market challenges. There is substantial stability in usage and consumption. The utility operates under generally supportive regulatory terms that contribute to credit quality. It has a diverse customer base throughout Missouri of about 1.2 million electric customers and 120,000 natural gas distribution customers in portions of central and eastern Missouri, including the St. Louis metropolitan area. The utility has an electricity generation fleet that includes low-cost coalfired assets that are subject to increasing air emissions rules and the Callaway nuclear power plant, which introduces higher operating risk. The utility is making ongoing investments in wind generation, notably the company's stated plan to acquire 700 megawatts of wind capacity through 2020.

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Financial Risk: Significant

Our stand-alone base-case scenario includes adjusted FFO to debt in the 15%-17% range, at the weaker end of the significant benchmark

range. The weakness in financial measures results from higher capital spending. Firstly, AM is expected to spend about \$1 billion on grid modernization through 2023. Additionally, through 2020, AM plans to invest about \$1 billion on wind generation capacity. The decline of FFO to debt is largely because of partly debt-funded capital spending on these projects as well as reduced deferred taxes. We expect debt leverage, as measured by total debt to EBITDA, in the 4.5x-5x range, indicating material debt leverage for the financial risk profile assessment. We expect discretionary cash flow to remain negative after taking into account the utility's capital spending and dividend payments leading to external funding needs including debt. AM benefits from various rate mechanisms that allow for the timely recovery of costs and support more stable operating cash flows. We expect AM will continue to fund its investments in a manner that preserves credit quality. We base our financial risk assessment on our medial volatility financial benchmarks table. It has more relaxed financial ratio benchmarks as compared to those used for a typical corporate issuer. This reflects the company's steady cash flows from its low-risk, rate-regulated electric and gas utility operations and regulatory risk management.7

20 IV.B. Ameren Missouri's Proposed Capital Structure

21 Q WHAT CAPITAL STRUCTURE IS AMEREN MISSOURI REQUESTING IN THIS

22 CASE?

23 A Ameren Missouri's proposed capital structure is shown in Table 5:

TABLE 5	
Ameren Missouri's Proposed Capit	tal Structure
Depositetion	As Filed
<u>Description</u>	Weight
Long-Term Debt	47.10%
Preferred Stock	00.99%
Common Equity	<u>51.91%</u>
Total Permanent Capital Structure	100.00%
Source: Schedule DTS-D1.	

⁷Standard & Poor's RatingsDirect: "Union Electric Co. d/b/a Ameren Missouri," February 14, 2019, pages 3-6.

1	Q	HOW DOES AMEREN MISSOURI'S REQUESTED CAPITAL STRUCTURE
2		COMPARE TO WHAT HAS BEEN AUTHORIZED FOR OTHER ELECTRIC
3		UTILITIES RECENTLY?
4	Α	Ameren Missouri's requested common equity ratio of 51.91% is largely in line with, but
5		slightly higher than, the average common equity ratio being awarded to regulated
6		electric utilities in 2019 as identified in Table 2.
7	IV.C.	Risk Proxy Group
8	Q	PLEASE DESCRIBE HOW YOU IDENTIFIED A PROXY UTILITY GROUP THAT
9		COULD BE USED TO ESTIMATE AMEREN MISSOURI'S CURRENT MARKET
10		COST OF EQUITY.

11 A I relied on the same electric proxy group developed by Ameren Missouri witness Mr.

12 Hevert with one exception: El Paso Electric Company. I excluded El Paso Electric

13 because it is the target of a major acquisition by JP Morgan Investment Management.

14 This acquisition was announced on June 3, 2019 shortly after the end of Mr. Hevert's

15 study period.8

16 Q WHY IS IT APPROPRIATE TO EXCLUDE COMPANIES THAT ARE INVOLVED IN
17 MERGER AND ACQUISITION ("M&A") ACTIVITY FROM THE PROXY GROUP?
18 A M&A activity can distort the market factors used in DCF and risk premium studies. M&A
19 activity can have impacts on stock prices, growth outlooks, and relative volatility in
20 historical stock prices if the market was anticipating or expecting the M&A activity prior

⁸Mr. Hevert's DCF analysis relied on average prices and dividends for the period ending May 31, 2019.

to it actually being announced. This distortion in the market data thus impacts the reliability of the DCF and risk premium estimates for a company involved in M&A.

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Moreover, companies generally enter into M&A in order to produce greater shareholder value by combining companies. The enhanced shareholder value normally could not be realized had the two companies not combined.

When companies announce a merger or acquisition, the public assesses the proposed transaction and develops outlooks on the value of the two companies after the combination based on expected synergies or other value-adds created by the M&A.

As a result, the stock value before the merger is completed may not reflect the forward-looking earnings and dividend payments for the company absent the merger or on a stand-alone basis. Therefore, an accurate DCF return estimate on companies involved in M&A activities cannot be produced because their stock prices do not reflect the stand-alone investment characteristics of the companies. Rather, the stock price more likely reflects the shareholder enhancement produced by the proposed transaction. For these reasons, it is appropriate to remove companies involved in M&A activities from a proxy group used to estimate a fair ROE for a utility.

Q PLEASE DESCRIBE HOW YOUR PROXY GROUP'S INVESTMENT RISK COMPARES TO AMEREN MISSOURI.

The proxy group shown in Schedule CCW-3, has an average corporate credit rating from S&P of BBB+, which is one notch below Ameren Missouri's SACP rating of A-.9

The proxy group has an average corporate credit rating from Moody's of Baa1, which is identical to Ameren Missouri's credit rating from Moody's.

⁹Ameren Missouri's SACP, or stand-alone credit profile, rating of A- is previously described in Section IV.A. on pages 18-19 of this testimony.

As also shown on my Schedule CCW-3, the proxy group has an average and median common equity ratio (including short-term debt) as reported by S&P Global Market Intelligence ("MI") of 46.9% and 45.2%, respectively. Similarly, as reported by *The Value Line Investment Survey* ("*Value Line*"), the proxy group has an average and median common equity ratio (excluding short-term debt) of 50.2% and 49.4%, respectively. In this regard, the Company's proposed common equity ratio of 51.9% excluding short-term debt is higher than the average and median common equity ratios of the proxy group.

Based on these parameters, I conclude that Ameren Missouri is reasonably risk-comparable to the proxy group. In fact, given that Ameren Missouri has a higher credit rating and common equity ratio, the use of this proxy group could be viewed as conservative in that Ameren Missouri's ROE should be slightly lower than the proxy group.

IV.D. Discounted Cash Flow Model

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- 15 Q PLEASE DESCRIBE THE DCF MODEL.
- 16 A The DCF model posits that a stock price equals the sum of the present value of
 17 expected future cash flows discounted at the investor's required rate of return or cost
 18 of capital. This model is expressed mathematically as follows:

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$$P_0 = \frac{D_1}{(1+K)^1} + \frac{D_2}{(1+K)^2} + \dots + \frac{D_{\infty}}{(1+K)^{\infty}}$$
 (Equation 1)

21 P_0 = Current stock price

D = Dividends in periods 1 - ∞

23 K = Investor's required return

1 This model can be rearranged in order to estimate the discount rate or investor-required 2 return, known as "K." If it is reasonable to assume that earnings and dividends will 3 grow at a constant rate, then Equation 1 can be rearranged as follows: 4 $K = D_1/P_0 + G$ (Equation 2) 5 K = Investor's required return 6 D_1 = Dividend in first year 7 P_0 = Current stock price 8 G = Expected constant dividend growth rate Equation 2 is referred to as the annual "constant growth" DCF model. 9

10 Q PLEASE DESCRIBE THE INPUTS TO YOUR CONSTANT GROWTH DCF MODEL.

As shown in Equation 2 above, the DCF model requires a current stock price, expected dividend, and expected growth rate in dividends.

13 Q WHAT STOCK PRICE HAVE YOU RELIED ON IN YOUR CONSTANT GROWTH 14 DCF MODEL?

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I relied on the average of the weekly high and low stock prices of the utilities in the proxy group over a 13-week period ending on November 1, 2019. An average stock price is less susceptible to market price variations than a price at a single point in time. Therefore, an average stock price is less susceptible to aberrant market price movements, which may not reflect the stock's long-term value.

A 13-week average stock price reflects a period that is still short enough to contain data that reasonably reflects current market expectations, but the period is not so short as to be susceptible to market price variations that may not reflect the stock's long-term value. In my judgment, a 13-week average stock price is a reasonable balance between the need to reflect current market expectations and the need to capture sufficient data to smooth out aberrant market movements.

Q WHAT DIVIDEND DID YOU USE IN YOUR CONSTANT GROWTH DCF MODEL?

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I used the most recently paid quarterly dividend as reported in *Value Line*.¹⁰ This dividend was annualized (multiplied by 4) and adjusted for next year's growth to produce the D₁ factor for use in Equation 2 above. In other words, I calculate D₁ by multiplying the annualized dividend (D₀) by (1+G).

Q WHAT DIVIDEND GROWTH RATES HAVE YOU USED IN YOUR CONSTANT GROWTH DCF MODEL?

There are several methods that can be used to estimate the expected growth in dividends. However, regardless of the method, for purposes of determining the market-required return on common equity, one must attempt to estimate investors' expectations about what the dividend, or earnings growth rate will be and not what an individual investor or analyst may use to make individual investment decisions.

As predictors of future returns, securities analysts' growth estimates have been shown to be more accurate than growth rates derived from historical data.¹¹ That is, assuming the market generally makes rational investment decisions, analysts' growth projections are more likely to influence investors' decisions, which are captured in observable stock prices, than growth rates derived only from historical data.

For my constant growth DCF analysis, I have relied on a consensus, or mean, of professional securities analysts' earnings growth estimates as a proxy for investors' dividend growth rate expectations. I used the average of analysts' growth rate estimates from three sources: Zacks, MI, and Yahoo! Finance. All such projections were available on November 1, 2019, and all were reported online.

¹⁰The Value Line Investment Survey, August 16, September 13, and October 25, 2019. ¹¹See, e.g., David Gordon, Myron Gordon, and Lawrence Gould, "Choice Among Methods of Estimating Share Yield," *The Journal of Portfolio Management*, Spring 1989.

1		Each growth rate projection is based on a survey of independent securities
2		analysts. There is no clear evidence whether a particular analyst is most influential on
3		general market investors. Therefore, a single analyst's projection does not as reliably
4		predict investor outlooks as does a consensus of market analysts' projections. The
5		consensus of estimates is a simple arithmetic average, or mean, of surveyed analysts'
6		earnings growth forecasts. A simple average of the growth forecasts gives equal
7		weight to all surveyed analysts' projections. Therefore, a simple average, or arithmetic
8		mean, of analyst forecasts is a good proxy for investor expectations.
9		The growth rates I used in my DCF analysis are shown in Schedule CCW-4.
10		The average growth rate for my proxy group is 5.64%.
11	Q	WHAT ARE THE RESULTS OF YOUR CONSTANT GROWTH DCF MODEL?
12	Α	As shown in Schedule CCW-5, the average and median constant growth DCF returns
13		for my proxy group for the 13-week analysis are 8.74% and 8.62%, respectively.
14	Q	DO YOU HAVE ANY COMMENTS ON THE RESULTS OF YOUR CONSTANT
15		GROWTH DCF ANALYSIS?
16	Α	Yes. The constant growth DCF analysis for my proxy group is based on a group
17		average long-term sustainable growth rate of 5.64%. The three- to five-year growth
18		rates are higher than the long-term projected GDP growth rate of 4.10%, described
19		below.
20	Q	HOW DID YOU IDENTIFY THE LONG-TERM PROJECTED GDP GROWTH RATE?
21	Α	Blue Chip Economic Indicators, which is a well-respected and often-cited publication,
22		projects that over the next 5 and 10 years, the U.S. nominal GDP will grow at an annual

rate of approximately 4.10%. These GDP growth projections reflect two components:
(1) a real growth outlook of around 1.9% to 2.0%; and (2) an inflation outlook of around
2.1% going forward. As such, the average growth rate over the next 10 years is around
4.10%, which I believe is a reasonable proxy of long-term sustainable growth. 12

In my multi-stage DCF analysis, I discuss academic and investment practitioner support for using the projected long-term GDP growth outlook as a maximum sustainable growth rate projection. A long-term sustainable growth rate for a utility stock cannot exceed the growth rate of the economy in which it sells its goods and services. Therefore, using the long-term GDP growth rate as a conservative projection for the maximum sustainable growth rate is logical, and is generally consistent with economic theory and practice.

IV.E. Sustainable Growth DCF

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Q PLEASE DESCRIBE WHAT THE SUSTAINABLE GROWTH DCF METHOD IS AND HOW YOU ESTIMATED A SUSTAINABLE GROWTH RATE FOR YOUR SUSTAINABLE GROWTH DCF MODEL.

A sustainable growth rate, also known as the internal growth rate, is based on the percentage of the utility's earnings that is retained and reinvested in utility plant and equipment. These reinvested earnings increase the earnings base (rate base). Earnings grow when plant funded by reinvested earnings is put into service, and the utility is allowed to earn its authorized return on such additional rate base investment.

The internal growth methodology is tied to the percentage of earnings retained in the company and not paid out as dividends. The earnings retention ratio is 1 minus

¹²Blue Chip Economic Indicators, October 10, 2019, at 14.

the dividend payout ratio. As the payout ratio declines, the earnings retention ratio increases. An increased earnings retention ratio will fuel stronger growth because the business funds more investments with retained earnings.

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The payout ratios of the proxy group are shown in my Schedule CCW-6. These dividend payout ratios and earnings retention ratios then can be used to develop a sustainable long-term earnings retention growth rate. A sustainable long-term earnings retention ratio will help gauge whether analysts' current three- to five-year growth rate projections can be sustained over an indefinite period of time.

The data used to estimate the long-term sustainable growth rate is based on the Company's current market-to-book ratio and on *Value Line*'s three- to five-year projections of earnings, dividends, earned returns on book equity, and stock issuances.

As shown in Schedule CCW-7, the average sustainable growth rate for the proxy group using this internal growth rate model is 4.76%.

WHAT IS THE DCF ESTIMATE USING THESE SUSTAINABLE GROWTH RATES?

A DCF estimate based on these sustainable growth rates is developed in Schedule CCW-8. As shown there, and using the same formula in Equation 2 above, a sustainable growth DCF analysis produces proxy group average and median DCF results for the 13-week period of 7.83% and 7.19%, respectively.

IV.F. Multi-Stage DCF Model

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Q HAVE YOU CONDUCTED ANY OTHER DCF STUDIES?

Yes. As previously indicated, the DCF is designed to reflect a present value of an infinite string of future cash flow. That said, however, my first constant growth DCF is based on the analyst growth rate projections, so it is a reasonable reflection of rational investment expectations over the next three- to five- years. The limitation on this constant growth DCF model is that it cannot reflect a rational expectation that a period of high or low short-term growth can be followed by a change in growth to a rate that is more reflective of long-term sustainable growth. Hence, I performed a multi-stage DCF analysis to reflect this outlook of changing growth expectations.

Q WHY DO YOU BELIEVE GROWTH RATES CAN CHANGE OVER TIME?

Analyst-projected growth rates over the next three to five years will change as utility earnings growth outlooks change. Utility companies go through cycles in making investments in their systems. When utility companies are making large investments, their rate base grows rapidly, which in turn accelerates earnings growth. Once a major construction cycle is completed or levels off, growth in the utility rate base slows and its earnings growth slows from an abnormally high three- to five-year rate to a lower sustainable growth rate.

As major construction cycles extend over longer periods of time, even with an accelerated construction program, the growth rate of the utility will slow simply because rate base growth will slow and the utility has limited human and capital resources available to expand its construction program. Therefore, the three- to five-year growth rate projection should be used as a long-term sustainable growth rate, but not without making a reasonable informed judgment to determine whether it considers the current

market environment, the industry, and whether the three- to five-year growth outlook is sustainable.

Q PLEASE DESCRIBE YOUR MULTI-STAGE DCF MODEL.

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The multi-stage DCF model reflects the possibility of non-constant growth for a company over time. The multi-stage DCF model reflects three growth periods: (1) a short-term growth period consisting of the first five years; (2) a transition period, consisting of the next five years (6 through 10); and (3) a long-term growth period starting in year 11 and extending into perpetuity.

For the short-term growth period, I relied on the consensus of analysts' growth projections described above in relationship to my constant growth DCF model. For the transition period, the growth rates were reduced or increased by an equal factor reflecting the difference between the analysts' growth rates and the long-term sustainable growth rate. For the long-term growth period, I assumed each company's growth would converge to the maximum sustainable long-term growth rate.

15 Q WHY IS THE GDP GROWTH PROJECTION A REASONABLE PROXY FOR THE 16 MAXIMUM SUSTAINABLE LONG-TERM GROWTH RATE?

Utilities cannot indefinitely sustain a growth rate that exceeds the growth rate of the economy in which they sell services. Utilities' earnings/dividend growth is created by increased utility investment or rate base. Such investment, in turn, is driven by service area economic growth and demand for utility service. In other words, utilities invest in

1		plant to meet sales demand growth. Sales growth, in turn, is tied to economic growth
2		in their service areas.
3		The U.S. Department of Energy, Energy Information Administration ("EIA") has
4		observed that utility sales growth tracks U.S. GDP growth, albeit at a lower level, as
5		shown in Schedule CCW-9. Utility sales growth has lagged behind GDP growth for
6		more than a decade. As a result, nominal GDP growth is a very conservative proxy for
7		utility sales growth, rate base growth, and earnings growth. Therefore, the U.S. GDP
8		nominal growth rate is a conservative proxy for the highest sustainable long-term
9		growth rate of a utility.
10	Q	IS THERE RESEARCH THAT SUPPORTS YOUR POSITION THAT, OVER THE
11		LONG TERM, A COMPANY'S EARNINGS AND DIVIDENDS CANNOT GROW AT A
12		RATE GREATER THAN THE GROWTH OF THE U.S. GDP?
13	Α	Yes. This concept is supported in published analyst literature and academic work.
14		Specifically, in a textbook titled "Fundamentals of Financial Management," published
15		by Eugene Brigham and Joel F. Houston, the authors state as follows:
16 17 18 19 20		The constant growth model is most appropriate for mature companies with a stable history of growth and stable future expectations. Expected growth rates vary somewhat among companies, but <u>dividends for mature firms are often expected to grow in the future at about the same rate as nominal gross domestic product (real GDP plus inflation)</u> . 13
21		The use of the economic growth rate is also supported by investment practitioners as
22		outlined as follows:
23		Estimating Growth Rates
24 25 26		One of the advantages of a three-stage discounted cash flow model is that it fits with life cycle theories in regards to company growth. In these theories, companies are assumed to have a life cycle with varying

¹³"Fundamentals of Financial Management," Eugene F. Brigham and Joel F. Houston, Eleventh Edition 2007, Thomson South-Western, a Division of Thomson Corporation at 298 (emphasis added).

1 2 3		growth characteristics. Typically, the potential for extraordinary growth in the near term eases over time and eventually growth slows to a more stable level.
4		* * *
5 6 7 8 9 10		Another approach to estimating long-term growth rates is to focus on estimating the overall economic growth rate. Again, this is the approach used in the <i>Ibbotson Cost of Capital Yearbook</i> . To obtain the economic growth rate, a forecast is made of the growth rate's component parts. Expected growth can be broken into two main parts: expected inflation and expected real growth. By analyzing these components separately, it is easier to see the factors that drive growth. ¹⁴
12	Q	ARE THERE ANY ACTUAL INVESTMENT RESULTS THAT SUPPORT THE
13		NOTION THAT THE GROWTH IN STOCK INVESTMENTS WILL NOT EXCEED THE
14		NOMINAL GROWTH OF THE U.S. GDP?
15	Α	Yes. This is evident by a comparison of the compound annual growth of the U.S. GDP
16		compared to the geometric growth of the U.S. stock market. Duff & Phelps measures
17		the historical geometric growth of the U.S. stock market over the period 1926-2018 to
18		be approximately 5.8%.15 During this same time period, the U.S. nominal compound
19		annual growth of the U.S. GDP was approximately 6.1%. ¹⁶
20		As such, over the past 90 years, the geometric average growth of the U.S.

As such, over the past 90 years, the geometric average growth of the U.S. nominal GDP has been higher but comparable to the average geometric growth of the U.S. stock market capital appreciation. This historical relationship indicates that the U.S. GDP growth outlook is a conservative estimate of the long-term sustainable growth of U.S. stock investments.

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¹⁴Morningstar, Inc., Ibbotson SBBI 2013 Valuation Yearbook at 51 and 52.

¹⁵Duff & Phelps, 2019 SBBI Yearbook at 6-17.

¹⁶U.S. Bureau of Economic Analysis, May 1, 2019.

1	Q	WHAT IS THE GEOMETRIC AVERAGE AND WHY IS IT APPROPRIATE TO USE
2		THIS MEASURE TO COMPARE GDP GROWTH TO CAPITAL APPRECIATION IN
3		THE STOCK MARKET?
4	Α	The geometric average growth rate and compound annual growth rate are used
5		interchangeably. The geometric annual growth rate is the calculated growth rate, or
6		return, that measures the magnitude of growth from start to finish. The geometric
7		average is best, and most often, used as a measurement of performance or growth
8		over a long period of time. 17 Because I am comparing achieved growth in the stock
9		market to achieved growth in U.S. GDP over a long period of time, the geometric
10		average growth rate is most appropriate.
11	Q	HOW DID YOU DETERMINE A LONG-TERM GROWTH RATE THAT REFLECTS
11 12	Q	HOW DID YOU DETERMINE A LONG-TERM GROWTH RATE THAT REFLECTS THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS?
	Q A	
12		THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS?
12 13		THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS? I relied on the consensus of long-term GDP growth projections as projected by
12 13 14		THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS? I relied on the consensus of long-term GDP growth projections as projected by independent economists. Blue Chip Economic Indicators publishes the consensus for
12 13 14 15		THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS? I relied on the consensus of long-term GDP growth projections as projected by independent economists. Blue Chip Economic Indicators publishes the consensus for GDP growth projections twice a year. These projections reflect current outlooks for
12 13 14 15 16		THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS? I relied on the consensus of long-term GDP growth projections as projected by independent economists. Blue Chip Economic Indicators publishes the consensus for GDP growth projections twice a year. These projections reflect current outlooks for GDP and are likely to be influential on investors' expectations of future growth outlooks.
12 13 14 15 16		THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS? I relied on the consensus of long-term GDP growth projections as projected by independent economists. Blue Chip Economic Indicators publishes the consensus for GDP growth projections twice a year. These projections reflect current outlooks for GDP and are likely to be influential on investors' expectations of future growth outlooks.
12 13 14 15 16 17	Α	THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS? I relied on the consensus of long-term GDP growth projections as projected by independent economists. <i>Blue Chip Economic Indicators</i> publishes the consensus for GDP growth projections twice a year. These projections reflect current outlooks for GDP and are likely to be influential on investors' expectations of future growth outlooks. The consensus of projected GDP growth is 4.10% over the next 10 years. 18
12 13 14 15 16 17	Α	THE CURRENT CONSENSUS OF INDEPENDENT MARKET PARTICIPANTS? I relied on the consensus of long-term GDP growth projections as projected by independent economists. <i>Blue Chip Economic Indicators</i> publishes the consensus for GDP growth projections twice a year. These projections reflect current outlooks for GDP and are likely to be influential on investors' expectations of future growth outlooks. The consensus of projected GDP growth is 4.10% over the next 10 years. DO YOU CONSIDER OTHER SOURCES OF PROJECTED LONG-TERM GDP

the consensus projections, as shown in Table 6.

¹⁷New Regulatory Finance, Roger Morin, PhD, at 133-134. ¹⁸Blue Chip Economic Indicators, October 10, 2019, at 14.

TABLE 6

GDP Forecasts

Source	Term_	Real <u>GDP</u>	Inflation	Nominal GDP
Blue Chip Economic Indicators	5-10 Yrs	2.0%	2.1%	4.1%
EIA - Annual Energy Outlook	30 Yrs	1.8%	2.3%	4.2%
Congressional Budget Office	9 Yrs	1.9%	2.1%	3.9%
Moody's Analytics	28 Yrs	2.0%	1.9%	3.9%
Social Security Administration	75 Yrs			4.3%
The Economist Intelligence Unit	30 Yrs	1.9%	1.8%	3.8%

The EIA in its *Annual Energy Outlook* projects real GDP out until 2050. In its 2019 Annual Report, the EIA projects real GDP through 2050 to be 1.8% and a long-term GDP price inflation projection of 2.3%. The EIA data supports a long-term nominal GDP growth outlook of 4.2%.¹⁹

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Also, the Congressional Budget Office ("CBO") makes long-term economic projections. The CBO is projecting real GDP growth to be 1.9% with a GDP price inflation outlook of 2.1%. The CBO's outlook for nominal GDP based on this projection is 3.9% through 2029.²⁰

Moody's Analytics also makes long-term economic projections. In its recent forecast through 2048, Moody's Analytics is projecting real GDP growth of 2.0% with GDP inflation of 1.9%.²¹ Based on these projections, Moody's is projecting nominal GDP growth of 3.9% through 2048.

¹⁹DOE/EIA Annual Energy Outlook 2019 With Projections to 2050, February 2019, Table 20.

²⁰CBO: The Budget and Economic Outlook: 2019 to 2029, January 2019.

²¹www.economy.com, Moody's Analytics Forecast, April 8, 2019.

The Social Security Administration ("SSA") makes long-term economic projections out to 2095. The SSA's nominal GDP projection, under its "intermediate cost" scenario of approximately 75 years, is 4.3%.²²

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The Economist Intelligence Unit, a division of *The Economist* and a third-party data provider to MI, makes a long-term economic projection out through 2050. The Economist Intelligence Unit is projecting real GDP growth of 1.9% with an inflation rate of 1.8% through 2050. The real GDP growth projection is in line with the consensus. The long-term nominal GDP projection based on these outlooks is approximately 3.8%.²³

The real GDP and nominal GDP growth projections made by these independent sources support the use of the consensus for 5-year and 10-year projected GDP growth outlooks as a reasonable estimate of market participants' long-term GDP growth.

WHAT STOCK PRICE, DIVIDEND, AND GROWTH RATES DID YOU USE IN YOUR MULTI-STAGE DCF ANALYSIS?

I relied on the same 13-week average stock prices and the most recent quarterly dividend payment data discussed above. For the first stage, I used the consensus of analysts' growth rate projections discussed above in my constant growth DCF model. The first stage covers the first five years, consistent with the time horizon of the securities analysts' growth rate projections. The second stage, or transition stage, begins in year 6 and extends through year 10. The second stage growth transitions the growth rate from the first stage to the third stage using a straight linear trend. For the third stage, or long-term sustainable growth stage, starting in year 11, I used a

²²www.ssa.gov, "2019 OASDI Trustees Report," Table VI.G4.

²³S&P Global Market Intelligence, Economist Intelligence Unit, downloaded on February 14, 2019.

- 1 4.10% long-term sustainable growth rate based on the consensus of economists' 2 long-term projected nominal GDP growth rate.
- WHAT ARE THE RESULTS OF YOUR MULTI-STAGE DCF MODEL? 3 Q
- As shown in Schedule CCW-10, the average and median DCF ROEs for my proxy 4 5 group using the 13-week average stock price are 7.45% and 7.38%, respectively.
- 6 PLEASE SUMMARIZE THE RESULTS FROM YOUR DCF ANALYSES. Q
- 7 Α It is my opinion that a reasonable range based on the DCF results summarized in 8 Table 7 is 7.2% to 8.7%.

TABLE 7		
Summary of DCF Results		
Description	Proxy C Average	<u>Group</u> <u>Median</u>
Constant Growth DCF Model (Analysts' Growth)	8.74%	8.62%
Constant Growth DCF Model (Sustainable Growth)	7.83%	7.19%
Multi-Stage DCF Model	7.45%	7.38%

9 IV.G. Risk Premium Model

- 10 Q PLEASE DESCRIBE YOUR BOND YIELD PLUS RISK PREMIUM MODEL.
- 11 This model is based on the principle that investors require a higher return to assume Α 12 greater risk. Common equity investments have greater risk than bonds because bonds 13 have more security of payment in bankruptcy proceedings than common equity and the 14 coupon payments on bonds represent contractual obligations. In contrast, companies

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are not required to pay dividends or guarantee returns on common equity investments.

Therefore, common equity securities are considered to be riskier than bond securities.

This risk premium model is based on two estimates of an equity risk premium. First, I quantify the difference between regulatory commission-authorized returns on common equity and contemporary U.S. Treasury bonds. The difference between the authorized return on common equity and the Treasury bond yield is the risk premium. I estimated the risk premium on an annual basis for each year since January 1986. The authorized ROEs were based on regulatory commission-authorized returns for electric utility companies. Authorized returns are typically based on expert witnesses' estimates of the investor-required return at the time of the proceeding.

The second equity risk premium estimate is based on the difference between regulatory commission-authorized returns on common equity and contemporary "A" rated utility bond yields by Moody's. I selected the period 1986 through 2019 because public utility stocks consistently traded at a premium to book value during that period. This is illustrated in Schedule CCW-11, which shows the market-to-book ratio since 1986 for the electric utility industry was consistently above a multiple of 1.0x. Over this period, an analyst can infer that authorized ROEs were sufficient to support market prices that at least exceeded book value. This is an indication that commission authorized returns on common equity supported a utility's ability to issue additional common stock without diluting existing shares. It further demonstrates that utilities were able to access equity markets without a detrimental impact on current shareholders.

Based on this analysis, as shown in Schedule CCW-12 the average indicated equity risk premium over U.S. Treasury bond yields has been 5.58%. Since the risk premium can vary depending upon market conditions and changing investor risk

perceptions, I believe using an estimated range of risk premiums provides the best method to measure the current return on common equity for a risk premium methodology.

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I incorporated five-year and 10-year rolling average risk premiums over the study period to gauge the variability over time of risk premiums. These rolling average risk premiums mitigate the impact of anomalous market conditions and skewed risk premiums over an entire business cycle. As shown on my Schedule CCW-12, the five-year rolling average risk premium over Treasury bonds ranged from 4.25% to 6.77%, while the 10-year rolling average risk premium ranged from 4.38% to 6.60%.

As shown on my Schedule CCW-13, the average indicated equity risk premium over contemporary "A" rated Moody's utility bond yields was 4.22%. The five-year and 10-year rolling average risk premiums ranged from 2.88% to 5.57% and 3.20% to 5.45%, respectively.

DO YOU BELIEVE THAT THE TIME PERIOD USED TO DERIVE THESE EQUITY RISK PREMIUM ESTIMATES IS APPROPRIATE TO FORM ACCURATE CONCLUSIONS ABOUT CONTEMPORARY MARKET CONDITIONS?

Yes. Contemporary market conditions can change dramatically during the period that rates determined in this proceeding will be in effect. A relatively long period of time where stock valuations reflect premiums to book value indicates that the authorized ROEs and the corresponding equity risk premiums were supportive of investors' return expectations and provided utilities access to the equity markets under reasonable terms and conditions. Further, this time period is long enough to smooth abnormal market movement that might distort equity risk premiums. While market conditions and

risk premiums do vary over time, this historical time period is a reasonable period to estimate contemporary risk premiums.

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Alternatively, some studies, such as Duff & Phelps referred to later in this testimony, have recommended that use of "actual achieved investment return data" in a risk premium study should be based on long historical time periods. The studies find that achieved returns over short time periods may not reflect investors' expected returns due to unexpected and abnormal stock price performance. Short-term, abnormal actual returns would be smoothed over time and the achieved actual investment returns over long time periods would approximate investors' expected returns. Therefore, it is reasonable to assume that averages of annual achieved returns over long time periods will generally converge on the investors' expected returns.

My risk premium study is based on data that inherently relied on investor expectations, not actual investment returns, and, thus, need not encompass a very long historical time period.

Q PLEASE EXPLAIN OTHER MARKET EVIDENCE YOU RELIED ON IN DETERMINING AN APPROPRIATE EQUITY RISK PREMIUM.

The equity risk premium should reflect the market's perception of risk in the utility industry today. I have gauged investor perceptions in utility risk today in Schedule CCW-14, where I show the yield spread between utility bonds and Treasury bonds over the last 40 years. As shown in this schedule, the average utility bond yield spreads over Treasury bonds for "A" and "Baa" rated utility bonds for this historical period are 1.49% and 1.93%, respectively. Yield spreads of "A" and "Baa" rated utility bonds over Treasury bonds during 2017 were 1.10% and 1.48%, respectively, which are lower than the 40-year averages. Similarly, yield spreads of "A" and "Baa" rated utility bonds over

Treasury bonds during 2018 were 1.14% and 1.56%, respectively, which are also lower than the 40-year averages.

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A current 13-week average "A" rated utility bond yield of 3.35% when compared to the current Treasury bond yield of 2.15%, as shown in Schedule CCW-15, page 1, implies a yield spread of 1.20%. This current utility bond yield spread is lower than the 40-year average spread for "A" rated utility bonds of 1.49%. The current spread for the "Baa" rated utility bond yield of 1.53% is 0.40% lower than the 40-year average of 1.93%.

These utility bond yield spreads are evidence that the market's recent perception of utility risk is below average relative to the historical time period and demonstrate that utilities continue to have strong access to capital in the current market.

WHAT IS YOUR RECOMMENDED RETURN FOR AMEREN MISSOURI BASED ON YOUR RISK PREMIUM STUDY?

Because of today's low interest rates and uncertainty revolving around forecasted interest rates, I am recommending more weight be given to the high-end risk premium estimates than the low-end, in order to be conservative. As such, I am recommending that the most recent five-year average risk premium be used in determining a fair ROE for Ameren Missouri. As shown on my Schedule CCW-12, the most recent five-year average risk premium over Treasury yields is 6.77%. A risk premium of 6.77% exceeds the 34-year average of 5.58% by 1.19%. Adding the 6.77% risk premium to the projected Treasury yield of 2.5% produces a ROE of 9.3%.

Similarly, as shown on my Schedule CCW-13, the most recent five-year allowed risk premium over utility bond yields is 5.57%. This risk premium is well above the

34-year historical average risk premium of 4.22%. The A-rated utility bond yield has averaged 3.35% and 3.57% over the 13-week and 26-week periods ending November 1, 2019, respectively. Adding the 5.57% risk premium to the A-rated utility bond yields of 3.35% and 3.57% produce an estimated cost of equity of 8.9% to 9.1%. Similarly, the Baa-rated utility bond yield has averaged 3.68% and 3.97% over the same 13-week and 26-week periods. Adding the 5.57% risk premium to the average Baa-rated utility bond yields of 3.68% and 3.97% produces an estimated cost of equity of approximately 9.3% to 9.5%. The estimated cost of equity using the risk premium over utility bond yields is in the range of 8.9% to 9.5%. The results of my risk premium analyses are summarized in Table 8.

TABLE 8 Summary of Risk Premiu	m Results
Description	ROE <u>Estimate</u>
Projected Treasury Yield	9.3%
13-Week Average Yields	
A-Rated Utility Bond	8.9%
Baa-Rated Utility Bond	9.3%
26-Week Average Yields	
A-Rated Utility Bond	9.1%
Baa-Rated Utility Bond	9.5%

IV.H. Capital Asset Pricing Model ("CAPM")

2 Q PLEASE DESCRIBE THE CAPM.

The CAPM method of analysis is based upon the theory that the market-required rate

of return for a security is equal to the risk-free rate, plus a risk premium associated with

the specific security. This relationship between risk and return can be expressed

mathematically as follows:

$$R_i = R_f + B_i \times (R_m - R_f)$$
 where:

 R_i = Required return for stock i

R_f = Risk-free rate

 R_m = Expected return for the market portfolio

 B_i = Beta - Measure of the risk for stock

The stock-specific risk term in the above equation is beta. Beta represents the investment risk that cannot be diversified away when the security is held in a diversified portfolio. When stocks are held in a diversified portfolio, stock-specific risks can be eliminated by balancing the portfolio with securities that react in the opposite direction to firm-specific risk factors (e.g., business cycle, competition, product mix, and production limitations).

The risks that cannot be eliminated when held in a diversified portfolio are non-diversifiable risks. Non-diversifiable risks are related to the market in general and referred to as systematic risks. Risks that can be eliminated by diversification are non-systematic risks. In a broad sense, systematic risks are market risks and non-systematic risks are business risks. The CAPM theory suggests the market will not compensate investors for assuming risks that can be diversified away. Therefore, the only risk investors will be compensated for are systematic, or non-diversifiable, risks. The beta is a measure of the systematic, or non-diversifiable risks.

1 Q PLEASE DESCRIBE THE INPUTS TO YOUR CAPM.

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2 A The CAPM requires an estimate of the market risk-free rate, the Company's beta, and 3 the market risk premium.

4 Q WHAT DID YOU USE AS AN ESTIMATE OF THE MARKET RISK-FREE RATE?

A As previously noted, *Blue Chip Financial Forecasts*' projected 30-year Treasury bond yield is 2.5%.²⁴ The current 30-year Treasury bond yield is 2.15%, as shown in Schedule CCW-15. Again, in an effort to provide a conservative ROE estimate, I used *Blue Chip Financial Forecasts*' projected 30-year Treasury bond yield of 2.5% for my CAPM analysis.

WHY DID YOU USE LONG-TERM TREASURY BOND YIELDS AS AN ESTIMATE OF THE RISK-FREE RATE?

Treasury securities are backed by the full faith and credit of the United States government, so long-term Treasury bonds are considered to have negligible credit risk. Also, long-term Treasury bonds have an investment horizon similar to that of common stock. As a result, investor-anticipated long-run inflation expectations are reflected in both common stock required returns and long-term bond yields. Therefore, the nominal risk-free rate (or expected inflation rate and real risk-free rate) included in a long-term bond yield is a reasonable estimate of the nominal risk-free rate included in common stock returns.

Treasury bond yields, however, do include risk premiums related to unanticipated future inflation and interest rates. In this regard, a Treasury bond yield is not entirely risk-free. Risk premiums related to unanticipated inflation and interest

²⁴Blue Chip Financial Forecasts, November 1, 2019 at 2.

1	rates reflect systematic market risks. Consequently, for companies with betas less than
2	1.0, using the Treasury bond yield as a proxy for the risk-free rate in the CAPM analysis
3	can produce an overstated estimate of the CAPM return.

Q WHAT BETA DID YOU USE IN YOUR ANALYSIS?

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As shown in Schedule CCW-16, the proxy group average and median *Value Line* beta estimates are 0.57 and 0.55, respectively. In my experience, a beta of this level is relatively low compared to what it has been in previous years. Given the sudden drop in beta estimates over the last year or so, I have also calculated the average beta measured since 2014. The historical average *Value Line* beta since then is 0.68 and has ranged from 0.58 to 0.75.

Q HOW DID YOU DERIVE YOUR MARKET RISK PREMIUM ESTIMATE?

I derived three market risk premium estimates: a forward-looking estimate using a risk premium methodology and two forward-looking estimates based on the DCF methodology.

15 Q PLEASE DESCRIBE YOUR MARKET RISK PREMIUM ESTIMATE DERIVED USING 16 THE RISK PREMIUM METHODOLOGY.

The forward-looking risk premium-based estimate was derived by estimating the expected return on the market (as represented by the S&P 500) and subtracting the risk-free rate from this estimate. I estimated the expected return on the S&P 500 by adding an expected inflation rate to the long-term historical arithmetic average real

return on the market. The real return on the market represents the achieved return above the rate of inflation.

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Duff & Phelps' 2019 SBBI Yearbook estimates the historical arithmetic average real market return over the period 1926 to 2018 to be 8.8%.²⁵ A current consensus for projected inflation, as measured by the Consumer Price Index ("CPI"), is 2.0%.²⁶ Using these estimates, the expected market return is 11.0%.²⁷ The market risk premium then is the difference between the 11.0% expected market return and the projected risk-free rate of 2.5%, or 8.5%.

PLEASE DESCRIBE YOUR MARKET RISK PREMIUM ESTIMATES DERIVED USING THE DCF METHODOLOGY.

I employed two versions of the constant growth DCF model to develop estimates of the market risk premium. I first employed the constant growth DCF model in the traditional sense by adding a projected 3-5 year growth rate to a projected dividend yield.

I obtained the expected growth rate of the S&P 500 Index from State Street Global Advisors ("State Street"). State Street is the creator of several exchange traded funds ("ETF") that cover a multitude of investment strategies. In general, ETFs can be expected to move up or down in value with the value of the applicable index. For example, the SPDR S&P 500 ETF (Ticker: SPY) is designed to correspond generally to the price and yield performance of the S&P 500 Index.

On its website, State Street publishes a multitude of comparative data for its SPY ETF and the S&P 500 Index, including the current dividend yield and 3-5 year earnings growth rates. As inputs to my first constant growth DCF analysis, I have relied

²⁵Duff & Phelps, 2019 SBBI Yearbook at 6-18.

²⁶Blue Chip Financial Forecasts, November 1, 2019 at 2.

 $^{^{27}\{ \{ (1 + 0.088) * (1 + 0.020) \} - 1 \} * 100.}$

on the published dividend yield and growth rate estimates for the S&P 500 Index as published by State Street on November 12, 2019. The published dividend yield and estimated growth for the S&P 500 as of November 12, 2019 were 1.91% and 10.70%, respectively. Using these inputs, a constant growth DCF produces an expected return on the market of 12.81%.²⁸ Subtracting the projected Treasury yield of 2.5% from the expected return on the market of 12.81% produces a market risk premium estimate of 10.3%.

My second DCF-based market risk premium estimate was derived by estimating the expected market return using a version of the FERC's two-step DCF methodology. FERC's two-step DCF analysis is a constant growth DCF using a growth rate that is calculated by weighting the 3-5 year growth rate estimate by two-thirds (2/3) and the projected long-term GDP growth rate by one-third (1/3). Applying 2/3 weight to the S&P 500 growth estimate of 10.70%, and 1/3 weight to the GDP growth rate estimate of 4.10% discussed above, produces a blended growth rate of 8.50%.²⁹

I then used the blended growth rate of 8.50% and the current dividend yield of 1.91% to estimate the expected market return by employing the constant growth DCF. This yields an expected market return of 10.57%.³⁰ Subtracting the projected risk-free rate of 2.5% from this expected market return produces a market risk premium of approximately 8.1%.

20 Q PLEASE EXPLAIN WHY YOU EMPLOYED THE TWO-STEP DCF METHOD.

As I discussed in detail above, the constant growth model assumes the input growth rate to be the growth rate in perpetuity. No company, regulated or not, can grow at a

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 $^{^{28}}DCF = 1.91\%*(1+10.70\%) + 10.70\% = 12.81\%.$

 $^{^{29}(10.70\%*2/3) + (4.10\%*1/3) = 8.50\%}$

 $^{^{30}}$ Two-Step DCF = 1.91%*(1+8.50%) + 8.50% = 10.57%.

higher rate than the economy in which it sells goods and services in perpetuity, which is the time period assumed in the DCF model. Because the actual earnings estimates for the underlying holdings are used to calculate a mean 3-5 year earnings growth rate estimate for the index, the individual growth rates for the underlying holdings must be taken into consideration in evaluating the reasonableness, or sustainability, of the growth rate for the index as a whole. For example, S&P 500 member company Everest Re Group (NYSE: RE) has a consensus projected growth rate of 75.01% as reported by Yahoo! Finance and a projected growth rate of 34.45% from *Value Line*. These growth rates are approximately 18.3x and 8.4x, respectively, greater than the consensus expected growth rate of the economy discussed earlier.

For these reasons, employing the two-step DCF based on a blended growth rate that gives some weight to projected GDP growth is reasonable.

HOW DO YOUR FORWARD-LOOKING ESTIMATES OF THE MARKET RISK

PREMIUM COMPARE TO THE HISTORICAL REALIZED MARKET RISK
PREMIUM?

Between 1926 and 2018, the arithmetic average of the achieved total return on the S&P
500 was 11.9% and the return on long-term Treasury bonds was 5.9%. The
indicated market risk premium is 6.0% (11.9% - 5.9% = 6.0%). Therefore, my
forward-looking estimates of the market risk premium of 8.5%, 8.1%, and 10.3%
exceed the historical market risk premium by 2.10% to 4.30%.

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³¹Duff & Phelps, 2019 Yearbook at 6-17.

³²Id.

- 1 Q HOW DO YOUR EXPECTED MARKET RETURNS COMPARE TO CURRENT
 2 EXPECTATIONS OF FINANCIAL INSTITUTIONS?
- As shown in Table 9, my expected market returns of 10.98%, 10.57%, and 12.81% exceed long-term market expectations of several financial institutions.

TABLE 9 Long-Term Expected Return on the Market

		<u>Expected</u>	l Return
Source	<u>Term</u>	Large Cap Equities	Nominal US GDP
BlackRock Capital Management ¹	25 Years	7.1%	N/A
JP Morgan Chase ²	10 – 15 Years	5.25%	3.75%
Vanguard ³	10 Years	3% - 5%	N/A
Research Affiliates ⁴	10 Years	2.60%	3.51%
Morningstar ⁵	10 Years	2.70%	N/A

Sources:

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When compared to the expected market returns of financial institutions above, my expected market returns of 10.98%, 10.57%, and 12.81% are more than two times higher than all but one projection. For these reasons, my expected market returns, and the associated market risk premiums, should be considered high-end estimates.

¹BlackRock Investment Institute, April 2019 report, downloaded 7/23/2019.

²JP Morgan Chase, Long-Term Capital Market Assumptions, 2019 Report.

³Vanguard Economic and Market Outlook for 2019: Down but not out, December 2018.

⁴Research Affiliates, Asset Allocation Interactive, downloaded 7/24/2019.

⁵Morningstar Markets Observer Q2 2019 at 12.

HOW DO YOUR ESTIMATED MARKET RISK PREMIUMS COMPARE TO THAT

ESTIMATED BY DUFF & PHELPS?

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The Duff & Phelps analysis indicates a market risk premium falls somewhere in the range of 5.50% to 6.91%. My forward-looking market risk premium estimates are in the range of 8.1% to 10.3%. All of my market risk premium estimates are substantially above the historical and normalized market risk premiums recommended by Duff & Phelps.

HOW DOES DUFF & PHELPS MEASURE A MARKET RISK PREMIUM?

Duff & Phelps makes several estimates of a forward-looking market risk premium based on actual achieved data from the historical period of 1926 through 2018 as well as normalized data. Using this data, Duff & Phelps estimates a market risk premium derived from the total return on large company stocks (S&P 500), less the income return on Treasury bonds.

Duff & Phelps' range is based on several methodologies. First, Duff & Phelps estimates a market risk premium of 6.91% based on the difference between the total market return on common stocks (S&P 500) less the income return on 20-year Treasury bond investments over the 1926-2018 period.³³

Second, Duff & Phelps used the Ibbotson & Chen supply-side model which produced a market risk premium estimate of 6.14%.³⁴ Duff & Phelps explains that the historical market risk premium based on the S&P 500 was influenced by an abnormal expansion of P/E ratios relative to earnings and dividend growth during the period, primarily over the last 30 years. In order to control for the volatility of extraordinary

³³Duff & Phelps 2019 Valuation Handbook at 3-44.

³⁴Id. at 3-45 to 3-46.

events and their impacts on P/E ratios, Duff & Phelps takes into consideration the three-year average P/E ratio as the current P/E ratio.³⁵ Therefore, Duff & Phelps adjusted this market risk premium estimate to normalize the growth in the P/E ratio to be more in line with the growth in dividends and earnings.

Finally, Duff & Phelps develops its own recommended equity, or market risk premium by employing an analysis that takes into consideration a wide range of economic information, multiple risk premium estimation methodologies, and the current state of the economy by observing measures such as the level of stock indices and corporate spreads as indicators of perceived risk. Based on this methodology, and utilizing a "normalized" risk-free rate of 3.5%, Duff & Phelps concludes that the current expected, or forward-looking, market risk premium is 5.5%, implying an expected return on the market of 9.0%.³⁶

It should be noted that Duff & Phelps' market risk premiums are measured over a 20-year Treasury bond. Because I am relying on a projected 30-year Treasury bond yield, the results of my CAPM analysis should be considered conservative estimates for the cost of equity.

WHAT ARE THE RESULTS OF YOUR CAPM ANALYSIS?

As shown in Schedule CCW-17, I have provided the results of six different applications of the CAPM. The first three results presented are based on the proxy group's current average beta of 0.57, a projected risk-free rate of 2.5%, and my three market risk premium estimates of 8.5%, 8.1%, and 10.3%. The results of the CAPM based on these inputs range from 7.09% to 8.34%.

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³⁵Duff & Phelps 2019 Valuation Handbook at 3-46.

³⁶ ld. at 3-36.

1 The last three results presented are based on the proxy group's historical beta of 0.68, a projected risk-free rate of 2.5%, and my three market risk premium estimates 2 of 8.5%, 8.1%, and 10.3%. The results of the CAPM based on these inputs range from 3 7.98% to 9.47%. My CAPM results are summarized in Table 10.

TABLE 10			
CAPM Results Summary			
Description	Current Beta	Historical <u>Beta</u>	
Risk Premium Method	7.32%	8.25%	
FERC 2-Step DCF Method	7.09%	7.98%	
DCF Method	8.34%	9.47%	

IV.I. Return on Equity Summary 5

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- BASED ON THE RESULTS OF YOUR RETURN ON COMMON EQUITY ANALYSES Q 6
- 7 DESCRIBED ABOVE, WHAT RETURN ON COMMON EQUITY DO YOU
- 8 **RECOMMEND FOR AMEREN MISSOURI?**
- 9 Α The results of my analyses are summarized in Table 11.

Return on Common Equity Summary

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Based on my analyses described above, I estimate Ameren Missouri's current market cost of equity to be in the range of 8.8% to 9.5% with a midpoint estimate of approximately 9.2%. The low-end of my recommended range is based largely on the high-end of my DCF and the low-end of my Risk Premium estimates. The high-end of my recommended range is based on the high-end of my Risk Premium and CAPM estimates.

V. OTHER CONSIDERATIONS

Q PLEASE SUMMARIZE THIS PORTION OF YOUR TESTIMONY.

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In this section, I discuss certain economic and legislative events that have occurred since Ameren Missouri's last litigated rate case where its most recent authorized ROE of 9.53% was established. I use this information in assessing the reasonableness of my recommended ROE of 9.20% for Ameren Missouri. Specifically over this time period, I look at the changes in interest rates and the enactment of Missouri Senate Bill ("SB") 564.

Q WHEN WAS AMEREN MISSOURI'S LAST FULLY LITIGATED BASE RATE CASE?

2 A Ameren Missouri filed its application for its most recently litigated rate case, Case No.

3 ER-2014-0258, on July 3, 2014. The Commission issued its Order establishing, among

4 other things in that proceeding, an authorized ROE of 9.53% on April 29, 2015.

5 Q WHAT HAS HAPPENED TO INTEREST RATES SINCE AMEREN MISSOURI'S

LAST FULLY LITIGATED RATE CASE?

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Interest rates have decreased quite considerably since July 3, 2014 (when Ameren Missouri filed its application in ER-2014-0258) and April 29, 2015 (when the Commission issued its Order in ER-2014-0258). As shown in Table 12, as of November 12, 2019, Treasury yields have fallen between 61 and 127 basis points, Arated utility bond yields have fallen between 56 and 95 basis points, and Baa-rated utility bond yields have fallen between 98 and 105 basis points since Ameren Missouri's authorized ROE of 9.53% was authorized by this Commission.

TABLE 12					
<u>Changes in In</u>	terest Rate	Since ER-2014	<u>-0258</u>		
Treasury A-Rated Baa-Rated <u>Date</u> <u>Yield</u> <u>Utility Yield</u> <u>Utility Yield</u>					
13-Week Avg as of:					
7/3/2014	3.42%	4.30%	4.73%		
4/29/2015	2.76%	3.91%	4.66%		
11/12/2019	2.15%	3.35%	3.68%		
Difference from:					
7/3/2014	-1.27%	-0.95%	-1.05%		
4/29/2015	-0.61%	-0.56%	-0.98%		

1	Q	HAVE THERE BEEN ANY MATERIAL LEGISLATIVE EVENTS THAT HAVE
2		OCCURRED SINCE ER-2014-0258?
3	Α	Yes. Most notably, on June 1, 2018, former Missouri Governor Eric Greitens signed
4		SB 564 into law. This legislation is summarized by S&P Global Market Intelligence as
5		follows:
6		Senate Bill 564
7 8 9 10 11 12 13 14 15 16 17 18		On June 1, 2018, Senate Bill 564 was signed by former Gov. Eric Greitens. S.B. 564 provides for the electric utilities, upon filing a notice with the PSC, to defer for future recovery 85% of all depreciation expense and return associated with "qualifying electric plant" investments made after filing the notice. The resulting regulatory asset balances, which are to accrue carrying charges at the utility's weighted average cost of capital and which would be amortized over a 20-year period once included in rates, are to be adjusted to reflect any prudence disallowances ordered by the PSC, and these provisions "shall not be construed to affect existing law respecting the burdens of production and persuasion in general rate proceedings for rate base additions." Utilities subject to these provisions will be required to tender five-year capital investment plans with the commission.
20 21 22 23 24 25		For each of the first five years that a utility is allowed to make the deferrals, the purchase and installation of smart meters will be limited to 6% of the utility's aggregate capital expenditures during any given year under the investment plan. At least 25% of each year's capital investment will be required to be allocated to grid-modernization projects.
26 27 28 29		Participating utilities will be subject to a three-year base rate freeze that would commence on the date new rates were established in the company's most recent rate case unless a force majeure event were to occur.
30		* * *
31 32 33 34 35 36 37 38 39		For Union Electric, if the difference between the utility's average overall rate at any point in time while this provision applies and the average of the utility's average overall rate as of the date new base rates are set in the company's rate case that concluded prior to the date the utility became subject to the aforementioned deferral provisions and the utility's average overall rate set after consideration of the above-noted tax adjustments reflects a compound annual growth rate of more than 2.85%, the utility is to be prohibited from recovering any amount in excess of the 2.85% as a performance penalty.

1 2 3		The decoupling mechanism and the deferral/rate cap provisions may not be used in conjunction with each other, and the utility may choose which of these ratemaking techniques to pursue. ³⁷
4	Q	DID AMEREN MISSOURI FILE TO ADOPT THE PROVISIONS OF SB 564?
5	Α	Yes. On September 1, 2018, Ameren Missouri filed with the Commission its intention
6		to defer 85% of its capital investment costs.
7	Q	HAS THERE BEEN A RECOGNITION OF CHANGES IN AMEREN MISSOURI'S
8		RISK SINCE THE PASSAGE OF SB 564?
9	Α	Yes. There have been multiple comments made by entities on both the equity and
10		credit sides. For example, S&P Global Market Intelligence states in its regulatory
11		ranking and profile report outlining its views on the Missouri Public Service Commission
12		as follows:
13 14 15 16 17 18 19		On June 1, 2018, former Gov. Eric Greitens signed legislation that improves aspects of the state's regulatory framework for electric utilities and reduces the impact of "regulatory lag." The bill allows the electric utilities to elect to pursue either a decoupling mechanism or a unique deferral arrangement for certain investments that would otherwise not be immediately captured in rates. In light of the enactment of this bill, RRA raised its ranking of Missouri regulation to Average/3, from Below Average/1.38
21		In addition, in its March 28, 2019 announcement, Moody's made the following
22		comments on SB 564 and its impact to Ameren Missouri's risk profile:
23		Union Electric
24		RATING OUTLOOK
25 26		The stable outlook on UE reflects an improved legislative construct in Missouri with the passage of SB 564, which largely offsets the expected

³⁷S&P Global Market Intelligence: "Missouri Public Service Commission," downloaded November 26, 2019, at 3.
³⁸Id. at 2.

1	decline in cash flow as a result of federal tax reform and frozen rates
2	through April 2020. ³⁹

3	Q	HOW SHOULD THE COMMISSION USE THESE OBSERVATIONS WITH REGARD
4		TO ESTABLISHING AMEREN MISSOURI'S COST OF EQUITY IN THIS
5		PROCEEDING?
6	Α	Given the observations of material declines in capital costs described above since
7		Ameren Missouri's cost of equity was last decided, and the impacts to Ameren
8		Missouri's risk profile as a result of legislative actions since ER-2014-0258, the
9		Commission should recognize that there has not been, for any reason, an increase in
10		the Company's cost of equity. In fact, if anything, there has been a decrease in the
11		Company's cost of equity given the changes in interest rates and changes in Ameren
12		Missouri's risk profile as a result of legislative actions since the Company's previously
13		awarded ROE of 9.53% was determined.

14 Q DOES THAT CONCLUDE YOUR DIRECT TESTIMONY?

15 A Yes, it does.

\\consultbai.loca\\documents\ProlawDocs\SDW\10842\Testimony-BAl\381964.docx

³⁹Moody's Investors Service Rating Action: "Moody's affirms the ratings of Ameren, Union Electric and Ameren Illinois, outlooks stable," March 28, 2019 at 3.

Qualifications of Christopher C. Walters

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1	Q	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
2	Α	Christopher C. Walters. My business address is 16690 Swingley Ridge Road,
3		Suite 140, Chesterfield, MO 63017.
4	Q	PLEASE STATE YOUR OCCUPATION.
5	Α	I am a Senior Consultant in the field of public utility regulation with the firm of Brubaker
6		& Associates, Inc. ("BAI"), energy, economic and regulatory consultants.
7	Q	PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL
8		EMPLOYMENT EXPERIENCE.
9	Α	I graduated from Southern Illinois University Edwardsville in 2008 where I received a
10		Bachelor of Science Degree in Business Economics and Finance. I graduated with a
11		Master of Business Administration Degree from Lindenwood University in 2011.
12		In January 2009, I accepted the position Financial Representative with
13		American General Finance and was promoted to Senior Assistant Manager. In this
14		position I was responsible for assisting in the management of daily operations of the
15		branch, analyzing and reporting on the performance of the branch to upper
16		management, performing credit analyses for consumers and small businesses, as well
17		as assisting home buyers obtain mortgage financing.
18		In January 2011, I accepted the position of Analyst with BAI. As an Analyst, I
19		performed detailed analysis, research, and general project support on regulatory and
20		competitive procurement projects. In July 2013, I was promoted to the position of
21		Associate Consultant. In January 2016, I was promoted to Consultant. In January
22		2018, I was promoted to Senior Consultant. As a Senior Consultant, I perform detailed

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technical analyses and research to support regulatory projects including expert testimony, and briefing assistance covering various regulatory issues. At BAI, I have been involved with several regulated projects for electric, natural gas and water and wastewater utilities, as well as competitive procurement of electric power and gas supply. My regulatory filing tasks have included measuring the cost of capital, capital structure evaluations, assessing financial integrity, merger and acquisition related issues, risk management related issues, depreciation rate studies, other revenue requirement issues and wholesale market and retail regulated power price forecasts. Since 2011, I have been working with BAI witnesses on utility rate of return filings. Specifically, I have assisted in analyzing rate of return studies, drafting discovery requests and analyzing responses, drafting testimony and exhibits and assisting with the review of the briefs in more than 30 states, two Canadian provinces, and the Federal Energy Regulatory Commission ("FERC").

BAI was formed in April 1995. BAI and its predecessor firm have participated in more than 700 regulatory proceedings in 40 states and Canada.

BAI provides consulting services in the economic, technical, accounting, and financial aspects of public utility rates and in the acquisition of utility and energy services through RFPs and negotiations, in both regulated and unregulated markets. Our clients include large industrial and institutional customers, some utilities and, on occasion, state regulatory agencies. We also prepare special studies and reports, forecasts, surveys and siting studies, and present seminars on utility-related issues.

In general, we are engaged in energy and regulatory consulting, economic analysis and contract negotiation. In addition to our main office in St. Louis, the firm also has branch offices in Phoenix, Arizona and Corpus Christi, Texas.

1	Q	HAVE YOU EVER TESTIFIED BEFORE A REGULATORY BODY?

- Yes. I have sponsored testimony before state regulatory commissions including:

 Arkansas, Delaware, Florida, Illinois, Iowa, Kansas, Kentucky, Louisiana, Maryland,

 Michigan, Minnesota, Nevada, Ohio, Oklahoma, Utah, and Wyoming. In addition, I

 have also sponsored testimony before the City Council of New Orleans and an affidavit

 before the FERC.
- 7 Q PLEASE DESCRIBE ANY PROFESSIONAL REGISTRATIONS OR 8 ORGANIZATIONS TO WHICH YOU BELONG.
- I earned the Chartered Financial Analyst ("CFA") designation from the CFA Institute.

 The CFA charter was awarded after successfully completing three examinations which

 covered the subject areas of financial accounting and reporting analysis, corporate

 finance, economics, fixed income and equity valuation, derivatives, alternative

 investments, risk management, and professional and ethical conduct. I am a member

 of the CFA Institute and the CFA Society of St. Louis.

Proceedings in Which Christopher C. Walters Filed Testimony

Date Filed	State	Docket No.	Utility	Subjects	
		······································			On Behalf Of
11/6/2019	MI	U-20561	DTE ELECTRIC COMPANY	Rate of Return / Capital Structure / Regulatory Plan / Securitization for Tree Trimming	Association of Businesses Advocating Tariff Equity
10/17/2019	MI	U-20359	INDIANA MICHIGAN POWER COMPANY	Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity
10/4/2019	WY	30026-2-GR-19 (Record No. 15267)	BLACK HILLS WYOMING GAS, LLC	Rate of Return / Capital Structure	Federal Executive Agencies
9/10/2019	MD	9610	BALTIMORE GAS AND ELECTRIC COMPANY	Rate of Return / Capital Structure	United States Department of Defense and all other Federal Executive Agencies
9/4/2019	NV	19-06002	SIERRA PACIFIC POWER COMPANY D/B/A NV ENERGY	Rate of Return / Capital Structure	Switch, Ltd.
8/1/2019	IA	RPU-2019-0001	INTERSTATE POWER AND LIGHT COMPANY	Rate of Return / Capital Structure	lowa Business Energy Coalition
7/16/2019	AR	19-008-U	SOUTHWESTERN ELECTRIC POWER COMPANY	Rate of Return / Capital Structure	The Office of the Arkansas Attorney General Leslie Rutledge
4/22/2019	OK	PUD 201800140	OKLAHOMA GAS AND ELECTRIC COMPANY	Rate of Return / Capital Structure	Federal Executive Agencies
3/1/2019	MI	U-20298	DTE GAS COMPANY	TCJA	Association of Businesses Advocating Tariff Equity
2/21/2019	МІ	U-20276	UPPER PENINSULA POWER COMPANY	Rate of Return / Capital Structure; Revenue Credits	Association of Businesses Advocating Tariff Equity and Calumet Electronics Corporation
2/1/2019	LA	UD-18-07	ENTERGY NEW ORLEANS, INC.	Rate of Return / Capital Structure	Air Products and Chemicals, Inc.
1/16/2019	KY	2018-00294 / 2018- 00295	KENTUCKY UTILITIES COMPANY /	Rate of Return / Capital Structure	United States Department of Defense and all other Federal Executive Agencies
11/7/2018	MI	U-20162		Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity
9/4/2018	LA	U-34794	CLECO CORPORATE HOLDINGS LLC AND CLECO POWER LLC	Ring Fence Conditions	Packaging Corporation of America
8/28/2018	ŲΤ	17-035-69	ROCKY MOUNTAIN POWER	Income Taxes - TCJA; Credit Metrics	Utah Industrial Energy Consumers
8/3/2018	IA	RPU-2018-0003		Rate of Return / Capital Structure	The Iowa Business Energy Coalition
6/5/2018	IL .	18-0463	AMEREN ILLINOIS COMPANY	Rate of Return / Capital Structure	Illinois Industrial Energy Consumers, Citizens Utility Board and Federal Executive Agencies
5/2/2018	ОК	PUD 201700496	COMI ANT	Rate of Return / Capital Structure	Federal Executive Agencies
2/1/2018	FL	20170179-GU	FLORIDA CITY GAS	Rate of Return / Capital Structure	Federal Executive Agencies

Proceedings in Which Christopher C. Walters Filed Testimony

Date Filed	State	Docket No.	Utility	Subjects	On Behalf Of
10/12/2017	MI	U-18370	INDIANA MICHIGAN POWER COMPANY	Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity
8/29/2017	MI	U-18255	DTE ELECTRIC COMPANY	Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity
5/31/2017	MN	E015/GR-16-664	MINNESOTA POWER	Rate of Return / Capital Structure	Large Power Intervenors
3/3/2017	KY	2016-00371	LOUISVILLE GAS AND ELECTRIC COMPANY	Rate of Return / Capital Structure	United States Department of Defense and all other Federal Executive Agencies
12/22/2016	МІ	U-18124	CONSUMERS ENERGY COMPANY	Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity
11/21/2016	0397-EL-AAM		DAYTON POWER AND LIGHT COMPANY	Plant In Service Riders / Surcharges / Trackers	Sierra Club
11/18/2016			SUEZ WATER DELAWARE INC.	Rate of Return / Capital Structure	State of Delaware Division of the Public Advocate
7/22/2016	М	U-17990	CONSUMERS ENERGY COMPANY	Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity
7/14/2016	US	ER-16000	VARIOUS UTILITIES	Rate of Return / Capital Structure	Alcoa Power Generating Inc.
3/21/2016	OK	PUD 201500273	OKLAHOMA GAS AND ELECTRIC COMPANY	Rate of Return / Capital Structure	Federal Executive Agencies
12/4/2015	MI	U-17882	CONSUMERS ENERGY COMPANY	Rate of Return / Capital Structure	Association of Business Advocating Tariff Equity
9/29/2015	AR	15-015-U	ENTERGY ARKANSAS, INC.	Rate of Return / Capital Structure	Federal Executive Agencies
7/9/2015	KS	15-WSEE-115-RTS	WESTAR ENERGY, INC. AND KANSAS GAS AND ELECTRIC COMPANY	Rate of Return / Capital Structure	Kansas Industrial Consumers Group, Inc.; Occidental Chemical Corporation; CCPS Transportation, LLC; Spirit AeroSystems, Inc.; Coffeyville Resources Refining & Marketing, LLC; The Goodyear Tire & Rubber Company: Unified School District #259 and Kansas Association of School Boards
5/22/2015	МІ	U-17767	DTE ELECTRIC COMPANY	Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity
4/24/2015	МІ	U-17735	CONSUMERS ENERGY COMPANY	Rate of Return / Capital Structure	Association of Businesses Advocating Tariff Equity

Electric Utilities (Valuation Metrics)

		18-Year Price to Earnings (P/E) Ratio 1																		
Line	Company	Average	2019 ²	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2000	2007	2000	2004			
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	2008 (13)	2 <u>007</u> (14)	2006 (15)	2005 (16)	2004 (17)	<u>2003</u> (18)	2002 (19)
1	ALLETE	17.74	25.30	15.06	23.05	18.63	15.06	17.23	18.59	15.88	14.66	15.98	16.08	13.95	44.70	***	****			` .
2	Attant Energy	16.34	23.40	18.07	20.60	22.30	18.07	16.60	15.28	14.50	14.45	12.47	13.86	13.43	14.78 15.08	16.55	17.91	25.21	N/A	N/A
3	Amoron Corp.	16,04	24.00	17.55	20.60	18.29	17.55	16.71	16.52	13.35	11.93	9.66	9.26	14,21	17,45	16.82 19.39	12.59	14.00	12.69	19.93
4	American Electric Power	14.46	23.00	15.77	19.33	15.16	15.77	15.88	14.49	13.77	11.92	13.42	10.03	13.06	16.27	12.91	16.72	16.28	13.51	15.78
5	Avangrid, Inc.	30.35	22,10	40.94	27.27	20.49	40.94	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		13.70	12.42	10.66	12.68
6	Avista Corp.	18.20	22.60	17.60	23,37	18.80	17.60	17.28	14.64	19.30	14.08	12.74	11.42	14.97	30,88	N/A	N/A	N/A	N/A	N/A
7	Black Hills	17.87	22.60	16.14	19.48	22.29	16.14	19.03	18.24	17.13	31.13	18.10	9.93			15,39	19.45	24.43	13.84	19.27
8	CenterPoint Energy	14.93	16,90	18.1D	17.91	21.91	18.10	16.96	18.75	14.85	14.58			N/A	15.02	15.77	17.27	17.13	15.95	12.52
9	CMS Energy Corp.	17.30	24.80	18.29	21.32	20.94	18.29	17.30	16.73	15.07	13.62	13.78	11.81	11.27	15.00	10.27	19,06	17.84	6.05	5.59
10	Consol, Edison	15,56	20.90	15.59	19.77	18.80	15.59	15.90	14.72	15.07	15.02	12.46	13.56	10.87	26.84	22.18	12.60	12.39	N/A	N/A
11	Dominion Resources	18.44	21.00	22.14	22.17	21.33	22.14	22.97	19.25	18.91	17.27	13.30	12.55	12.29	13.78	15.49	15,13	18.21	14.30	13.28
12	DTE Energy	15.78	21.10	18.11	18.59	18.97	18.11	14.91	17.92	14.89		14.35	12.74	13.78	20.63	15.98	24.89	15.07	15.24	12.05
13	Duke Energy	17.02	17.60	18.22	- 19.93	21.25	18.22	17.91	17,45	17.46	13.51	12.27	10.41	14.81	13.27	17.43	13.80	16.04	13.69	11.28
14	Edison Int'l	13.97	14.10	14,77	17.23	17.92	14.77	13.05	12.70	9.71	13.76	12.69	13.32	17.28	16.13	N/A	N/A	N/A	N/A	N/A
15	El Paso Electric	17.96	31.30	18.33	21.78	18.66	18.33	16.38	15.88		11.81	10,32	9.72	12.36	16.03	12.99	11.74	37.59	6.97	7.78
16	Entergy Corp.	13.86	21.80	12.53	15.01	10.92	12.53	12.89	13.88	14.47 11.22	12.60	10.72	10.79	11.89	15.26	16.92	26.72	22.03	18.26	22.99
17	Eversource Energy	17.85	22.10	18,11	19.47	18.69	18.11	17.92	16.94	19.86	9.06	11.57	11.98	16.56	19.30	14.28	16.28	15.09	13.77	11.53
18	Evergy, Inc.	22.90	22.90	N/A	N/A	N/A	N/A	N/A	16.94 N/A		15.35	13.42	11.96	13.66	13.75	27.07	19.76	20.77	13.35	16.07
19	Exclon Corp.	14.32	15.00	12.58	13,41	18.68	12.58	16.02	13.43	N/A 19.08	N/A 11.30	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
20	FirstEnergy Corp.	17.24	16.80	17.02	11,41	15.91	17.02					10.97	11,49	17.97	18.22	16.53	15.37	12.99	11.77	10.46
21	Fortis Inc.	19.28	21.40	18.00	16.81	21.60	18.00	39.79 24.29	13.06 19.97	21.10	22.39	11.75	13.02	15.64	15.59	14.23	16.07	14.13	22.47	12.95
22	Great Plains Engrey	15.76	N/A	19.37	NMF	17.98	19.37	16.47		20.12	18.79	18.22	16.36	17.48	21,14	17.68	N/A	N/A	N/A	N/A
23	Hawalian Elec.	18.38	22.70	20.40	20.69	13.56	20.40	15.88	14.19 16.21	15.53	16.11	12.10	16.03	20.55	16.35	18.30	13.96	12.59	12.23	11.09
24	IDACORP, Inc.	16.41	24.40	16.22	20.60	19.06	16.22			15.81	17.09	18.59	19.79	23.16	21.57	20.33	18.27	19.18	13.76	13.47
25	MGE Enorgy	18.92	29.30	20.28	29.36	24.90	20.28	14.67 17.19	13.45	12.41	11.54	11.83	10.20	13.93	18.19	15.07	16.70	15.49	26.51	18.88
26	NextEra Energy, Inc.	16.36	24.30	16.89	21.65	20.71	16.89		17.01	17.23	15.82	14.98	15.14	14.22	15.01	15.88	22.40	17.98	17.55	15.96
27	NorthWestern Corp	17.16	21.20	18.36	17.85	17,19		17.25	16.57	14.43	11.54	10.83	13.42	14.48	18.90	13.65	17.88	13.65	17.88	13.60
28	OGE Energy	15.36	20.60	17.69	18.32	17.19	18.36	16.24	16.86	15.72	12.62	12.90	11.54	13.87	21.74	25.95	17.09	N/A	N/A	N/A
29	Otter Tail Corp.	23.92	23.60	18.20	22.06	20.19	17.69	18.27	17.69	15.16	14.37	13,31	10.83	12.41	13.75	13.68	14.95	14.13	11.84	14.12
30	PG&E Corp.	17.39	23.60 N/A	26.40			18.20	18.84	21.12	21.75	47.48	55.10	31.16	30.06	19.02	17.35	15.40	17.34	17.77	16.01
31	Pinnacle West Capital	15.82	20.20	16.04	18.28 19.28	21.13 18.74	26.40 16.04	15.00	23.67	20.70	15.46	15.80	13.01	12.08	16.85	14.84	15.37	13.81	9.50	N/A
32	PNM Resources	18.14	24.60	18.85	20.43			15.89	15.27	14.35	14.60	12.57	13.74	16.07	14.93	13.69	19.24	15.80	13.96	14.43
33	Portland General	16.71	22.90	17.71	20.43	19.83 19.06	16.85	18.68	16.13	14.97	14.53	14.05	18.09	N/A	35.65	15.57	17.38	15.02	14.73	15.08
34	PPL Corp.	14,14	12.00	13.92	17.65	12.83	17.71 13.92	15.32	16.88	13.98	12.37	12.00	14.40	16.30	11,94	23.35	N/A	N/A	N/A	N/A
35	Public Serv. Enterprise	13.44	16.10	12.41				14.08	12.84	10.88	10.52	11.93	25.69	17.64	17.26	14.10	15.12	12.51	10.59	11.06
36	SCANA Corp.	14.00	N/A	14.67	16.31	15.35	12.41	12.51	13.50	12.79	10.40	10.37	10.04	13.65	16.54	17.81	16.74	14.26	10.58	10.00
37	Sompra Energy	15.46	24.30	19.73	14.46	16.80	14.67	13,68	14.43	14.80	13.67	12.93	11.63	12.67	14.96	15.42	14,44	13.57	13.05	12.17
38	Southern Co.				24.33	24.37	19.73	21.87	19.58	14.89	11.77	12.60	10.09	11.80	14.01	11.50	11.79	3.65	8.96	8.19
39	Vectren Corp.	15.82	18.00	15.B5	15.48	17.76	15.85	16.04	16.19	16.97	15.85	14.90	13.52	16.13	15.95	16.19	15.92	14.68	14.83	14.63
40	WEC Energy Group	17.10 16.90	N/A 27.90	17.92	23.54	19.18	17.92	19.98	20.66	15.02	15.83	15.10	12.89	16.79	15.33	18.92	15.11	17.57	14.80	14.16
41	Wester Energy	15.75		21.33	20.01	19.95	21.33	17.71	16.50	15.76	14.25	14.01	13.35	14.77	16.47	15.97	14.46	7.51	12.43	10.46
	Xcel Energy Inc.		N/A	18.45	23.40	21.59	18.45	15.36	14.04	13.43	14.78	12.96	14.95	16.96	14.10	12.18	14.79	77.44	10.78	14.02
42	Acor chargy mc.	17.15	24.10	16.54	20.20	18.48	16.54	15.44	15.04	14.82	14.24	14.13	12.66	13.69	16.65	14.80	15.36	13.65	11.62	40.80
43	Avorage	16.65	21.81	18.00	19.81	18.97	18.00	17.39	16.38	15.69	15.30	14.28	13.56	15.18	17.74	16.47	16.52	16.57	13.70	14.31
44	Median	16.08	22.60	17.71	19.97	18.80	17.71	16.54	16.27	15.04	14.31	12.91	12.82	14.21	16.41	15.88	15.92	15.29	13.60	13.47

Sources:

The Value Line Investment Survey Investment Analyzer Software, downloaded on June 25, 2019.

The Value Line Investment Survey, August 16, Soptember 13, and October 25, 2019.

Electric Utilities (Valuation Metrics)

		****							Mark	at Price to	Cash Flow	(MP/CF) R	atio 1							
Line	Company	18-Year <u>Average</u>	2019 ^{2/4}	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003	2002
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
1	ALLETE	9.49	10.74	10.16	10.95	8.26	7.49	8.80	9.15	8.18	7.91	8.04	8.51	9.29	10.30	11.06	11.54	11.46	N/A	N/A
2	Alliant Energy	7.81	10.75	9.71	13.21	10.67	8.86	8.40	7.52	7.50	7.21	6.59	6.23	7,49	7.92	8.00	5.09	5.52	4.76	5.20
3	Amoren Corp.	7.02	9.14	7.95	8.38	7.44	6.87	6.95	6.61	5.48	5.02	4.23	4.25	6.35	7,69	8.57	8.57	8.24	6.74	7.96
4	American Electric Power	6.39	8.83	8.03	8.81	7.57	7.09	7.00	6.57	5.93	5.46	5.54	4.71	5.71	6.84	5.54	6.07	5.50	4.69	5.19
5	Avangrid, Inc.	9.94	9.46	10.24	10.14	8.56	11.30	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6	Avista Corp.	6.74	7.43	10.14	9.35	7.63	6.76	7.30	6.21	6.88	6.40	5.80	4.06	5.12	7.58	5.30	6.58	7.58	5.36	5.90
7	Block Hills	7.77	10.42	8.83	9.20	9.33	8.06	8.81	8.03	6.04	7.85	6.16	4.26	11.26	7.62	6.92	7.57	6.69	6.89	5.92
8	CenterPoint Energy	5.11	6.23	8.45	6.97	5.96	5.75	6.25	6.56	5.15	5.39	4.70	4.05	4.29	5.17	3.94	4.70	4.26	2.08	2.16
9	CMS Energy Corp.	5.85	9.37	8.40	8.75	8.50	7.53	7.13	6.68	6.03	5.41	4.48	3.64	3.45	5.57	4.40	4.04	3.20	2.88	NMF
10	Consol, Edison	8.26	9.41	8.73	9.64	9.39	7.96	7.89	7.77	8.31	6.15	7.39	6.72	6.89	B.31	8.65	8.59	9.31	7.90	7.64
11	Deminion Resources	9.59	12.66	10.94	11.35	11.59	11,84	12.27	10.88	9.92	9.45	8.12	6.98	8.27	8.65	7.81	10.09	7.68	7.51	8.53
12	DTE Energy	6.38	9.46	8.54	9.05	8.64	8.52	6.42	6.65	5.91	5.18	4.69	3.59	4.90	5.73	5.21	5.54	6.00	5.62	5.20
13	Duke Energy	7.58	7.41	7.65	8.40	8.57	7.95	8.12	8.11	9.53	6.56	6.01	5.96	7.13	7.16	N/A	N/A	N/A	N/A	N/A
14	Edison Intil	5.81	6.59	13.46	7.05	6.77	5.92	5.68	5.46	4.59	4.22	4.11	3.95	5.63	7.01	5.87	5.61	6.84	2.82	2.96
15	El Paso Electric	5.11	9.13	9.43	8.54	7.46	6.47	6.33	6.19	5.78	5.16	4.31	3.98	4.95	5.44	6.25	6.67	4.65	3.90	4.39
16	Entergy Corp.	5.73	6.13	4.92	4.66	4.01	4.11	4.21	4.03	4.23	3,90	4.66	5.68	7.96	9.21	7.16	8.76	7.12	6.84	5.57
17	Eversource Energy	6.83	9.90	9.16	10.36	10.14	10.12	10.14	8.08	9.30	6.99	4.97	4,61	4.12	6.18	6.02	3.55	3.78	2.85	2.75
18	Evergy, Inc.	8.20	8.20	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
19	Exelon Corp.	6.08	5.17	5.05	4.45	4.80	4.70	5.09	4.61	5.54	5.86	5.10	5.98	9.65	9.89	8.62	7.97	6.29	5.71	4.97
20	FirstEnergy Corp.	6.44	7.87	8.84	4.76	5.12	5.38	7.43	6.15	7.42	7.33	4.49	4.91	7.58	7.89	7.53	6.04	5.15	6.90	5.10
21	Fortis Inc.	8.23	8.81	7.97	8.23	10.46	7.29	9,25	7.93	B.09	8.38	7.40	6.76	7.58	9.18	7.89	N/A	N/A	N/A	N/A
22	Great Plains Energy	6.89	N/A	N/A	14.62	8.63	6.66	6.45	5.73	6.09	5.74	4.49	5.06	7.71	7.13	7.68	6.70	6.52		
23	Hawalian Elec.	8.02	9.22	8.34	9.21	7.44	9.25	7.64	8.15	8.05	7.73	7.81	6.95	9.10	7.95	8.47	8.29	8.44	5.92	5.14
24	IDACORP, Inc.	8.38	12.87	11.72	11.56	10.95	9.37	8.59	7.78	7.05	6.64	6.52	5.31	7.10	8.23				6.12	6.20
25	MGE Energy	11.28	14.21	15.04	17.33	15.66	12.53	11.42	11.20	10.77	9.48	9.05	8.40	8.42		7.73	7.55	7.15	7.27	7.53
26	NextEra Energy, Inc.	7.81	12.44	10.76	11.62	9.23	7.93	7.98	7.60	7.58	5.98	5.33	6.09	7.34	9.23	9.30	11.73	11.04	10.20	8.09
27	NorthWestern Corp	7.69	9.31	B.19	8.82	8.65	8.99	9.01	7.61	6.85	5.89	5.79	5.05	5.57	9.02	6.51	6.71	6.71	5.97	5.77
28	OGE Energy	7.93	10.84	9.36	10.52	9.03	9.25	10.65	9.93	7.35	7.48	6.61			8.45	9.39	7.31	8.13	N/A	N/A
29	Ottor Tail Corp.	9.42	12.37	11.58	11.09	9.38	9.04	9.45	9.58	8.43	9.04		5.37 8.01	6.43	7.58	7.50	7.04	6.73	5.62	5.39
30	PG&E Corp.	5.55	N/A	- 5.65	7.09	7.26	7.24	5.65	6.84	5.86	5.32	8.07 5.42	4.71	11.65 4.61	9.53	8.66	8.18	9.01	8.13	8.33
31	Pinnacle Wost Capital	6.15	7.85	7.09	8.73	7.89	6.91	7.03	6.85	6.34	5.80	5.65	3.84		5.84	5.28	5.07	5.13	4.05	14.69
32	PNM Resources	6.81	8.20	7.57	7.40	7.64	6.95	7.48	6.47	5.80	4.94	4.58		4.19	4.76	4.48	7.48	5.88	4.80	5.21
33	Portland General	5.81	7.31	6.56	7.45	7.12	6.73	5.49	6.06	5.08	4.86	4.13	4.53 4.63	7.10	13.67	7.50	7.62	6.84	5.55	5.72
34	PPL Corp.	7.47	7.68	7.02	10.11	8.37	8.73	7.32	6.59	5.87	5.98	7.46	8.82	4.81 9.17	5,34	5.74	N/A	N/A	N/A	N/A
35	Public Serv. Enterprise	7.48	8.27	9.48	8.67	8.56	6.66	6.48	6.4D	6.40	6.03	6.04			8.90	7.58	7.57	6.49	5.41	5.30
36	SCANA Corp.	7.09	N/A	N/A	8.26	9.59	8.33	7.50	7.49	7.40	6.75	6.52	6.20	8.46	9.83	8.41	8.59	7.17	6.79	6.24
37	Sempra Energy	7.95	11.50	10.10	10.65	10.88	9.99	10.77	9.37	7.46	6.13	6.53	5.88 6.07	6.38	7.15	7.03	5.40	6.86	6.59	6.36
38	Southern Co.	8.13	8.15	7.05	7.49	8.83	8.23	8.42	8.30	8.75	8.22	7.79		7.07	9.61	7.22	6.96	5.16	4.85	4.00
39	Vectren Corp.	7.08	N/A	N/A	10.32	8.60	7.82	7.57	6.82	5.79	5.81	7.79 5.58	7.08	8.18	3.62	8.47	8.41	8.28	8.28	7.83
40	WEC Energy Group	8.64	12.79	10.82	11.04	10.95	12.90	10.27	9.58	9.24	8.43		5.24	6.90	5.53	7.37	7.06	7.63	7.27	6.92
41	Wester Energy	6.91	N/A	N/A	10.87	10.86	9.05	7.93				8.15	6.87	7.57	7.84	7.27	6.40	6.27	4.91	4.27
	Xcel Energy Inc.	6.61	9.18	7.90	8.50	8.10	7.62	7.93	7.23	6.71	6.67	5.51	5.32	7.09	6.88	5.81	7.00	6.54	4.24	2.94
7.	real circigy mo.	3.01	J. 10	7.30	0.50	0.10	1.02	1.31	7.00	6.85	6.47	6.28	5.43	5.71	5.51	5.54	5.62	5.31	4.27	5.46
43	Average	7.31	9.33	8.64	9.36	8.65	8.05	7.85	7.39	6.98	0 52	6.00	6.60	e or	7.70	7 45				
	Median	7.19	9.18	8.73	9.05	8.57	7.93	7.54	7.39	6.98	6.53 6.27	5.80	5.59	5.95	7.72	7.12	7.13	6.77	5.70	5.85
	***		W. 19	0.70	3.00	0.57	1.30	1.54	1.12	0.00	0.27	5.50	5.35	7.09	7.76	7.37	7.04	6.71	5.62	5.52

Sources:

Note:

¹ The Value Line Investment Survey Investment Analyzer Software, downloaded on June 25, 2019.

² The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

Based on the average of the high and low price for 2019 and the projected 2019 Coah Flow per share, published in The Value Line Investment Survey, August 16, Soptember 13, and October 25, 2019.

Electric Utilities (Valuation Metrics)

Dominion Rosources 2.62 2.17 2.40 2.94 3.15 3.34 3.55 2.97 2.84 2.37 2.01 1.80 2.42 2.69 2.07 2.50 OTE Energy 1.48 1.98 1.91 2.01 1.82 1.65 1.62 1.51 1.35 1.20 1.16 0.89 1.10 1.35 1.29 1.39 Duke Energy 1.20 1.41 1.33 1.41 1.33 1.41 1.33 1.29 1.28 1.19 1.12 1.11 1.00 0.91 1.06 0.15 N/A N/A Edison Int' El Passe Elocitric 1.59 1.97 1.97 2.17 1.92 1.76 1.68 1.57 1.53 1.24 1.07 1.04 1.56 2.05 1.80 1.93 1.96 1.97 1.96 1.97 1.97 2.17 1.97 2.17 1.92 1.76 1.68 1.57 1.53 1.24 1.07 1.04 1.56 2.05 1.80 1.93 1.96 1.76 1.67 1.40 1.33 1.21 1.31 1.35 1.62 1.66 2.44 2.65 1.89 2.01 1.76 1.67 1.67 1.67 1.67 1.68 1.59 1.68 1.57 1.58 1.52 1.66 2.44 2.65 1.89 2.01 1.76 1.67 1.67 1.67 1.67 1.67 1.67 1.6										Marke	t Price to I	Book Value	(MP/BV) R	Ratio 1				
Control Education Cont			15-Year															
ALLETE 181 187 1.79 1.78 1.53 1.37 1.42 1.51 1.34 1.35 1.29 1.15 1.55 1.89 2.09 2.22 Almort Energy 1.70 2.17 2.18 2.38 2.17 1.86 1.86 1.70 1.57 1.48 1.31 1.04 1.33 1.07 1.52 1.33 Amoran Ciery 1.50 2.19 1.82 1.83 1.81 1.55 1.59 1.80 1.93 1.09 1.31 1.04 1.33 1.07 1.48 1.45 1.55 1.89 1.09 1.02 1.02 1.02 1.02 1.02 Amoran Ciery 1.50 2.19 1.15 1.55 1.80 1.93 1.07 1.15 1.55 1.80 1.93 1.07 1.00 1.02 1.02 1.03 Amoran Ciery 1.50 2.10 2.	Line	Company																
Allone Energy 1.70	1	ALLETE	1 51	1 97	4.70	4.70	4.50									, ,	, ,	
Amoreon Corp. 145 2.15 1.95 1.93 1.97 1.48 1.45 1.29 1.18 0.90 0.83 0.78 1.25 1.80 1.82 1.88 1.81 1.85 1.58 1.81 1.85 1.58 1.81 1.85	2																	
Amorpan Electric Power	3																	
Avangalo, Inc.	4															1.60	1.62	1.68
Awata Corp. 1.33												1.23	1.23	1.08	1.48	1.85	1.56	1.57
Black Hills	5								N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CentlerPoint Energy CAMS Energy Corp. 2.34 1.58 2.16 2.59 2.73 2.43 2.27 2.20 1.99 1.87 1.86 1.87 1.86 1.77 2.40 2.31 2.75 3.06 Centes Educon 1.41 1.55 1.49 1.83 1.58 1.58 1.42 1.34 1.38 1.34 1.38 1.34 1.38 1.34 1.38 1.34 1.38 1.34 1.38 1.34 1.38 1.34 1.38 1.34 1.38 1.34 1.35 1.34 1.38 1.34 1.38 1.34 1.35 1.35 1.34 1.35 1.35 1.34 1.35 1.35 1.34 1.35 1.35 1.34 1.35	6								1.33	1.25	1.21	1.19	1.07	0.94	1.11	1.29	1.30	1.13
Centerforit Energy 2.34 1.58 2.18 2.59 2.73 2.43 2.27 2.30 1.99 1.87 1.96 1.77 2.49 3.13 2.75 3.06 CMS Energy Gorp. 2.02 3.14 2.91 2.93 2.72 2.43 2.26 2.09 1.91 1.86 1.48 1.10 1.23 1.82 1.12 1.32 Consol. Education 1.41 1.55 1.49 1.83 1.58 1.42 1.32 2.86 2.09 1.91 1.88 1.48 1.42 1.30 1.82 1.47 1.47 1.47 1.47 1.47 1.47 1.47 1.47	7			1.85	1.61		1.94	1.59	1.79	1.62	1.21	1.14	1.07	0.83	1.22	1.57	1.47	1.63
CMS Energy Corp. 2.02 3.14 2.91 2.93 2.72 2.43 2.26 2.09 1.91 1.86 1.48 1.10 1.23 1.82 1.42 1.32 Cominen Rosourcos 2.62 2.17 2.40 2.94 3.15 3.34 3.55 2.97 2.84 2.37 2.01 1.80 2.42 2.69 2.07 2.50 OTTE Energy 1.46 1.86 1.93 1.92 1.47 1.35 1.22 1.06 1.17 1.47 1.47 1.57 1.29 1.06 Electric 1.47 1.47 1.47 1.55 1.29 1.26 1.20 1.16 0.89 1.10 1.35 1.29 1.20 1.06 1.07 1.04 1.05 1.29 1.20 1.06 1.07 1.04 1.05 1.29 1.20 1.06 1.07 1.04 1.05 1.20 1.06 1.05 1.29 1.20 1.06 1.07 1.04 1.05 1.20 1.06 1.05 1.20 1.06 1.05 1.20 1.06 1.05 1.20 1.06 1.05 1.20 1.06 1.05 1.20 1.06 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.00 1.05 1.05 1.20 1.05 1.00 1.05 1.05 1.00 1.05 1.05 1.0	8		2.34	1.58	2.18	2.59	2.73	2.43	2.27	2.30	1.99	1.87	1.96	1.77	2.49	3.13	2.75	
Consol. Edison 1.41 1.55 1.49 1.63 1.58 1.42 1.34 1.38 1.47 1.38 1.22 1.08 1.17 1.47 1.47 1.47 1.47 1.52 1.00 ITE Energy 1.48 1.89 1.91 1.01 1.81 1.81 1.82 1.85 1.82 1.85 1.82 1.81 1.81 1.81 1.81 1.81 1.81 1.82 1.85 1.82 1.83 1.81 1.81 1.81 1.83 1.82 1.83 1.83 1.83 1.84 1.83 1.83 1.84 1.85 1.82 1.83 1.84 1.85 1.82 1.83 1.84 1.85 1.82 1.83 1.84 1.85 1.82 1.83 1.84 1.83 1.84 1.85 1.82 1.83 1.84 1.83 1.84 1.85 1.82 1.83 1.84 1.83 1.84 1.85 1.85 1.82 1.85 1.	9	CMS Energy Corp.	2.02	3.14	2.81	2.93	2.72	2.43	2.26	2.09	1.91	1.66	1.48					
Deminen Rosourcos 2.52 2.17 2.40 2.94 3.15 3.34 3.55 2.97 2.84 2.37 2.01 1.80 2.42 2.99 2.07 2.50	10	Consol, Edison	1.41	1.55	1.49	1.63	1.58	1.42	1.34	1.38	1.47							
DTE Endrary 148 198 191 201 182 185 186 186 187 188 189 191 102 1180	11	Dominion Resources	2.62	2.17	2.40	2.94	3.15	3.34										
Duke Enérgy 1.20 1.41 1.33 1.41 1.35 1.29 1.25 1.28 1.19 1.112 1.11 1.10 0.93 1.06 1.15 1.06 1.05 1.06 1.05 1.00 1.01 1.06 1.05 1.00 1.01 1.06 1.05 1.00 1.01 1.00 1.01 1.00 1.01 1.00 1.01 1.00 1.01 1.00 1.01 1.00	12	DTE Energy	1.48	1.98	1.91	2.0t												
Edison Inf. El Paso Ellordric Ellordric El Paso Ellordric Ellordric El Paso Ellordric El Paso Ellordric	13	Duke Energy	1.20	1.41														
El Pago Elloctric 159																		
Entergy Corp. 1.74 2.01 1.74 1.75 1.67 1.60 1.63 1.63 1.61 1.75 1.67 1.60 1.63 1.63 1.61 1.71 1.60 1.63 1.63 1.61 1.71 1.60 1.63 1.63 1.61 1.71 1.60 1.63 1.63 1.61 1.71 1.60 1.62 1.63 1.63 1.63 1.71 1.60 1.63 1.63 1.63 1.63 1.71 1.60 1.62 1.63 1.63 1.63 1.63 1.63 1.71 1.60 1.62 1.63 1.6																		
Eversource Energy 145 1.88 1.68 1.73 1.64 1.53 1.47 1.38 1.28 1.50 1.31 1.12 1.31 1.50 1.22 1.05 1.69 1.64 1.65 1.67 1.66 1.67 1.68 1.68 1.73 1.64 1.53 1.47 1.38 1.28 1.50 1.31 1.12 1.31 1.10 1.22 1.05 1.66 1.33 1.36 1.28 1.50 1.31 1.12 1.31 1.50 1.22 1.05 1.66 1.33 1.36 1.28 1.36 1.36 1.36 1.36 1.36 1.36 1.36 1.36																		
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Exolon Corp. 223 1.42 1.31 1.20 1.20 1.14 1.28 1.17 1.46 1.95 2.07 2.57 4.39 4.79 3.89 3.60 FirstEnorpy Corp. 1.93 2.74 2.87 3.53 2.97 1.16 1.35 1.26 1.44 1.33 1.36 1.54 2.52 2.23 1.92 Fortis Inc. 1.47 1.35 1.24 1.41 1.26 1.33 1.35 1.45 1.59 1.56 1.33 1.48 1.63 1.96 N/A Groat Flowing Energy 1.21 N/A N/A 1.33 1.17 1.12 1.11 1.02 0.96 0.93 0.87 0.80 1.11 1.66 1.77 1.86 Howalian Eloc. 1.64 1.98 1.76 1.76 1.63 1.71 1.12 1.11 1.02 0.96 0.93 0.87 0.80 1.11 1.65 1.77 1.78 IDACORP, Inc. 1.43 2.08 1.96 1.94 1.76 1.54 1.45 1.33 1.19 1.17 1.13 0.92 1.09 1.26 1.37 1.22 NoxtEra Enorgy, Inc. 2.03 2.69 2.59 2.88 2.60 2.10 2.10 2.06 1.92 1.75 1.65 1.54 1.62 1.75 1.83 2.09 NoxtEra Enorgy, Inc. 2.03 2.76 2.32 2.35 2.30 2.09 2.15 1.93 1.74 1.55 1.49 1.70 2.06 2.34 1.80 1.80 NorthWestern Corp 1.46 1.86 1.48 1.54 1.88 1.50 1.54 1.56 1.42 1.35 1.22 1.07 1.15 1.48 1.60 Otter Tail Corp. 1.83 2.99 2.49 2.33 1.90 1.78 1.90 1.76 1.59 1.59 1.59 1.19 1.17 1.13 1.18 1.71 1.93 1.76 1.76 1.76 1.78 1.70																		
FirstEndrey Corp. 193 2.74 2.87 3.53 2.37 1.16 1.15 1.28 1.44 1.33 1.36 1.54 2.52 2.23 1.83 1.96 1.84 1.85 1.26 1.37 1.86 1.87 1.89 1.59 1.56 1.33 1.36 1.54 2.52 2.23 1.83 1.96 N/A Creat Plante Energy 1.21 N/A N/A 1.33 1.77 1.12 1.11 1.02 0.96 0.93 0.87 0.80 1.11 1.66 1.77 1.86 1.80 1.90 1.90 1.90 1.90 1.90 1.90 1.90 1.9																		
Fortis Inc. 1.47 1.35 1.24 1.41 1.26 1.33 1.35 1.45 1.59 1.59 1.59 1.50 1.50 1.33 1.48 1.63 1.66 1.77 1.86 1.77 1.86 1.87 Howalian Elic. 1.64 1.98 1.76 1.76 1.76 1.76 1.83 1.71 1.71 1.12 1.71 1.19 1.74 1.85 1.82 1.84 1.83 1.81 1.81 1.81 1.82 1.83 1.81 1.83 1.81 1.83 1.81 1.83 1.81 1.83 1.81 1.83 1.84 1.83 1.83 1.84 1.83 1.84 1.85 1																		
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Hawalian Elica. 184 1.98 1.76 1.76 1.52 1.71 1.49 1.54 1.62 1.54 1.44 1.16 1.51 1.57 2.01 1.78 1.00 1.00 1.00 1.00 1.00 1.00 1.00 1.0																1.63	1.96	N/A
IDACORP. Inc.	22										0.96	0.93	0.87	0.80	1.11	1.66	1,77	1.86
MGE Energy 2 08 2.69 2.59 2.88 2.60 2.10 2.10 2.06 1.92 1.75 1.65 1.54 1.82 1.75 1.83 2.02 Nortiles Energy (Inc. 2.03 2.76 2.32 2.35 2.30 2.09 2.15 1.93 1.74 1.55 1.49 1.70 2.06 2.34 1.80 1.93 Nortiles Energy (Inc. 2.03 2.76 2.32 2.35 2.30 2.09 2.15 1.93 1.74 1.55 1.49 1.70 2.06 2.34 1.80 1.93 Nortiles Energy 1.85 2.01 1.75 1.85 1.85 1.89 1.70 1.70 1.70 1.70 1.70 1.70 1.70 1.70											1.62	1.54	1.44	1.16	1.61	1.57	2.01	1.78
NoxIEM Energy, Inc. 2.03 2.76 2.32 2.35 2.30 2.09 2.15 1.93 1.74 1.55 1.49 1.70 2.06 2.34 1.80 1.93 NoxIEM Energy, Inc. NoxIEM Energy, Inc. 2.03 2.76 2.32 2.35 2.30 2.09 2.15 1.93 1.74 1.55 1.49 1.70 2.06 2.34 1.80 1.93 NoxIEM Energy 1.85 2.04 1.75 1.82 1.73 1.79 2.22 2.24 1.94 1.90 1.70 1.37 1.52 1.98 1.91 1.80 Otter Tail Corp. 1.83 2.59 2.49 2.33 1.90 1.78 1.90 1.96 1.58 1.35 1.10 1.18 1.71 1.93 1.74 1.74 1.74 1.75 1.80 1.96 1.58 1.35 1.20 1.70 1.70 1.71 1.93 1.74 1.74 1.74 1.75 1.75 1.75 1.75 1.75 1.75 1.75 1.75										1.33	1.19	1.17	1.13	0.92	1.09	1.26	1.37	1.22
NorthWestorn Corp						2.88	2.60	2.10	2.10	2.06	1.92	1.75	1.65	1.54	1.62	1.75	1.83	2.09
NorthWestern Corp				2.76	2.32	2.35	2.30	2.09	2.15	1.93	1.74	1.55	1,49	1.70				
OGE Enorgy 1,85 2.01 1,75 1,82 1,73 1,79 2,22 2.24 1,94 1,90 1,70 1,37 1,52 1,98 1,91 1,90 1,90 1,90 1,90 1,90 1,90 1,90	27	NorthWestern Corp	1.46	1.66	1.48	1.64	1.68	1.60	1.54	1.56	1.42	1.35	1.22	1.07				
Ottor Tail Corp. 1.83 2.59 2.49 2.33 1.90 1.78 1.90 1.96 1.96 1.96 1.96 1.96 1.96 1.96 1.96	28	OGE Enorgy	1.85	2.01	1.75	1.82	1.73	1.79	2.22	2.24	1.94							
PG&E Corp. 1.60 N/A 1.70 1.71 1.89 1.57 1.39 1.38 1.41 1.46 1.56 1.41 1.50 1.56 1.41 1.50 1.54 1.83 1.84 1.83 1.84 1.85 1.87 PNM Rosourcos 1.24 2.23 1.83 1.84 1.56 1.33 1.21 1.09 0.98 0.80 0.69 0.56 0.66 0.66 1.23 1.21 1.25 1.26 1.25 PNM Rosourcos 1.24 2.23 1.83 1.84 1.56 1.59 1		Otter Tail Corp.	1.83	2.59	2.49	2.33	1.90	1.78										
Pinna Governo Mark Capital 1.41 1.88 1.74 1.91 1.72 1.52 1.44 1.47 1.39 1.25 1.14 0.95 1.00 1.26 1.26 1.25 1.25 1.25 1.26 1.25 1.26 1.25 1.26 1.25 1.26 1.26 1.26 1.26 1.26 1.26 1.26 1.26	30	PG&E Corp.	1.60	N/A	1.70	1.71	1.69											
PNM Rosourcos 1,24 2,23 1,83 1,84 1,56 1,33 1,21 1,09 0,98 0,80 0,69 0,56 0,66 1,23 1,21 1,45 Portland General 1,32 1,77 1,56 1,69 1,56 1,42 1,37 1,28 1,14 1,99 0,94 0,92 1,05 1,32 1,36 N/A PPL Corp. 2,12 1,75 1,81 2,40 2,46 2,24 1,64 1,55 1,58 1,47 1,61 2,10 3,19 3,05 2,43 2,50 Public Serv. Enterprise 1,91 1,87 1,81 1,88 1,67 1,58 1,57 1,44 1,46 1,59 1,67 1,78 2,58 2,99 2,46 2,45 SCANA Corp. 1,51 N/A N/A 1,65 1,74 1,47 1,48 1,48 1,48 1,36 1,33 1,20 1,45 1,62 1,64 1,72 Sempra Energy 1,80 2,11 2,06 2,24 2,00 2,17 2,20 1,84 1,53 1,28 1,35 1,32 1,60 1,87 1,70 1,73 Southern Co. 2,04 1,93 1,89 2,07 2,01 1,99 2,02 2,04 2,15 1,99 1,83 1,73 2,12 2,24 2,23 2,35 Vactern Corp. 1,83 N/A N/A 2,75 2,29 2,11 2,08 1,82 1,57 1,53 1,41 1,34 1,64 1,74 1,77 1,82 WEC Energy Group 1,92 2,57 2,11 2,10 2,09 1,82 2,34 2,21 2,05 1,81 1,85 1,40 1,57 1,77 1,71 1,62 Wester Energy Group 1,92 2,57 2,11 2,10 2,09 1,82 2,34 2,21 2,05 1,81 1,85 1,40 1,57 1,77 1,71 1,62 Wester Energy Group 1,93 2,55 1,97 2,06 1,88 1,66 1,55 1,50 1,51 1,41 1,32 1,19 1,30 1,53 1,40 1,38 Average 1,69 1,99 1,89 1,89 1,89 1,89 1,89 1,89 1,8	31	Pinnacle West Capital	1.41	1.88	1.74	1.91	1.72	1.52										
Portland General 1.32 1.77 1.56 1.69 1.56 1.42 1.37 1.28 1.14 1.09 0.94 0.92 1.05 1.32 1.74 1.66 N/A PPL Corp. 2.12 1.75 1.81 2.40 2.46 2.24 1.64 1.55 1.58 1.47 1.61 2.10 3.19 3.05 2.43 2.50 Public Serv. Enterprise 1.91 1.87 1.81 1.68 1.67 1.58 1.47 1.64 1.59 1.67 1.67 2.58 2.99 2.46 2.24 SCANA Corp. 1.51 N/A N/A 1.65 1.74 1.47 1.48 1.48 1.36 1.33 1.20 1.45 1.62 2.62 2.46 2.24 2.00 2.11 1.80 1.41 1.48 1.48 1.48 1.48 1.48 1.33 1.20 1.45 1.82 1.64 1.72 Scampra Energy 1.80 2.01 1.99<	32	PNM Resources	1.24	2.23														
PPL Corp. 2.12 1.75 1.81 2.40 2.46 2.24 1.64 1.55 1.58 1.47 1.81 2.10 3.19 3.05 1.54 2.10 3.19 3.05 2.43 2.56 2.49 2.46 2.24 1.54 1.55 1.58 1.47 1.81 2.10 3.19 3.05 2.54 2.99 2.46 2.24 2.24 1.55 1.58 1.47 1.81 2.10 3.19 3.05 2.54 2.99 2.46 2.24 2.04 1.55 1.44 1.46 1.59 1.67 1.78 2.58 2.99 2.46 2.45 2.56 2.99 2.46 2.45 2.56 2.99 2.46 2.45 2.56 2.99 2.46 2.45 2.56 2.99 2.46 2.45 2.58 2.99 2.46 2.45 2.56 2.99 2.46 2.45 2.50 2.81 1.52 1.53 1.28 1.60 1.73 2.52 2.99	33	Portland General	1.32															
Public Serv. Enterprise 1.91 1.87 1.81 1.68 1.67 1.58 1.57 1.44 1.46 1.59 1.67 1.78 2.58 2.99 2.46 2.45 SCANA Corp. 1.51 N/A N/A 1.65 1.74 1.47 1.48 1.48 1.36 1.33 1.20 1.45 1.62 1.64 1.72 Sempre Energy 1.80 2.11 2.06 2.24 2.00 2.17 2.20 1.84 1.53 1.32 1.60 1.87 1.73 Southern Co. 2.04 1.93 1.89 2.07 2.01 1.99 2.02 2.04 2.15 1.99 1.83 1.73 2.12 2.24 2.20 2.04 2.15 1.99 1.83 1.73 2.12 2.24 2.00 1.99 2.02 2.04 2.15 1.99 1.83 1.73 2.12 2.24 2.23 2.35 Yeatren Corp. 1.83 N/A N/A 2.75 2.29	34	PPL Corp.																
SCANA Corp. 1.51 N/A N/A 1.65 1.74 1.47 1.48 1.48 1.48 1.36 1.33 1.20 1.45 1.62 1.64 1.72 Sempra Energy 1.80 2.11 2.06 2.24 2.00 2.17 2.20 1.84 1.53 1.28 1.35 1.32 1.60 1.87 1.70 1.73 Southern Co. 2.04 1.93 1.89 2.07 2.01 1.99 2.02 2.04 2.15 1.99 1.83 1.73 2.12 2.24 2.23 2.35 Vectren Corp. 1.83 N/A N/A 2.75 2.29 2.11 2.08 1.82 1.57 1.53 1.41 1.34 1.64 1.74 1.77 1.82 WEC Energy Group 1.92 2.57 2.11 2.10 2.09 1.82 2.34 2.21 2.05 1.81 1.85 1.40 1.57 1.77 1.71 1.62 Wester Energy 1.37 N/A N/A 1.94 1.95 1.49 1.44 1.33 1.26 1.20 1.10 0.93 1.10 1.36 1.30 1.41 Xcol Energy Inc. 1.59 2.25 1.97 2.06 1.88 1.68 1.55 1.50 1.51 1.41 1.32 1.19 1.30 1.53 1.40 1.38 Average 1.69 1.99 1.88 2.00 1.85 1.67 1.68 1.60 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80	35	Public Serv. Enterprise																
Sampra Energy 1.80 2.11 2.06 2.24 2.00 2.17 2.20 1.84 1.83 1.28 1.35 1.32 1.60 1.87 1.70 1.73 Southern Co. 2.04 1.93 1.89 2.07 2.01 1.99 2.02 2.04 2.15 1.99 1.83 1.73 2.12 2.24 2.23 2.35 Vection Corp. 1.83 N/A N/A 2.75 2.29 2.11 2.08 1.82 1.57 1.53 1.41 1.34 1.64 1.74 1.77 1.72 2.23 2.85 VEC Energy Group 1.92 2.57 2.11 2.09 1.82 2.34 2.21 2.05 1.81 1.85 1.40 1.57 1.77 1.71 1.62 Webster Fanorgy 1.37 N/A N/A 1.94 1.95 1.44 1.33 1.26 1.0 1.93 1.10 1.33 1.10 1.33 1.10 1.37 1.77 1.77 <td></td> <td>SCANA Corp.</td> <td></td>		SCANA Corp.																
Southern Co. 2.04 1.93 1.89 2.07 2.01 1.99 2.02 2.04 2.15 1.99 1.83 1.73 2.12 2.24 2.23 2.35 Vectren Corp. 1.83 N/A N/A 2.75 2.29 2.11 2.08 1.82 1.57 1.53 1.41 1.34 1.64 1.74 1.77 1.82 WEC Energy Group 1.92 2.57 2.11 2.10 2.09 1.82 2.34 2.21 2.05 1.81 1.65 1.40 1.57 1.77 1.77 1.62 Wester Energy 1.37 N/A N/A 1.94 1.95 1.49 1.44 1.33 1.26 1.20 1.10 0.93 1.10 1.36 1.30 1.41 Xcol Energy Inc. 1.59 2.25 1.97 2.06 1.88 1.66 1.55 1.50 1.51 1.41 1.32 1.19 1.30 1.53 1.40 1.38 Average 1.69 1.98 1.88 2.00 1.85 1.67 1.68 1.60 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80																		
Vector Corp. 1.83 N/A N/A 2.75 2.29 2.11 2.08 1.82 1.57 1.53 1.41 1.34 1.64 1.77 1.82 WEC Energy Group 1.92 2.57 2.11 2.09 1.82 2.34 2.21 2.05 1.81 1.85 1.40 1.57 1.77 1.71 1.71 1.62 Wester Fenergy 1.37 N/A N/A 1.94 1.95 1.44 1.33 1.26 1.20 1.10 0.93 1.10 1.36 1.01 1.36 1.01 1.37 1.53 1.41 1.32 1.10 1.33 1.10 1.36 1.01 1.02 1.01 1.03 1.10 1.33 1.10 1.33 1.41 1.32 1.10 1.33 1.40 1.38 1.60 1.55 1.50 1.51 1.41 1.32 1.19 1.30 1.53 1.40 1.38 Average 1.69 1.89 1.88 2.00 1	38																	
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Wester Energy 1.37 N/A N/A 1.94 1.85 1.49 1.44 1.33 1.26 1.20 1.10 0.93 1.10 1.36 1.30 1.41 Xcol Energy Inc. 1.59 2.25 1.97 2.06 1.88 1.66 1.55 1.50 1.51 1.41 1.32 1.19 1.30 1.53 1.40 1.38 Average 1.69 1.98 1.88 2.00 1.85 1.67 1.68 1.60 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80																		
Xcol Energy Inc. 1.59 2.25 1.97 2.06 1.88 1.66 1.55 1.50 1.51 1.41 1.32 1.79 1.30 1.53 1.40 1.38 Average 1.69 1.99 1.88 2.00 1.85 1.67 1.68 1.60 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80																		
Average 1.69 1.98 1.88 2.00 1.85 1.67 1.68 1.60 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80																		
1.00 1.00 1.00 1.00 1.00	44	ACCI LIMITY IIIS.	1.59	2.45	1,91	2.06	1.88	7.00	1.55	7.50	1,51	1.41	1.32	1.19	1.30	1.53	1.40	1.38
1.00 1.00 1.00 1.00 1.00	43	Averago	1.60	1.00	1 00	2.00	4 05	4.07	4.00									
1.00 1.01 1.00 1.01 1.71 1.73																		
		medici)	1.00	1.07	1.00	1.51	1.74	1.07	1.53	1.49	1.47	1.37	1,31	7.15	1.48	1.71	1,71	1.73

Sources:

Notes:

¹ The Value Line Investment Survey Investment Analyzer Software, downloaded on June 25, 2019.

² The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

Based on the average of the high and low price for 2018 and the projected 2018 Book Value per share, published in The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

Electric Utilities (Valuation Motrics)

Blant Energy 1,70					***					Marko	at Price to I	Book Value	(MP/8V) R	Ratio 1				
LLETE 1.6.1 1.87 1.79 1.78 1.59 1.69 (9) (7) (8) (9) (10) (11) (12) (12) (13) 1.49 (15) (16) (16) (16) (17) (18) (18) (18) (18) (18) (18) (18) (18																		
Blant Energy 1.70	Ling	Company																
Blook Energy 1.70 2.77 2.16 2.38 2.17 1.86 1.96 1.97 1.46 1.31 1.04 1.33 1.67 1.52 1.33 more not corp. 1.45 2.16 1.95 1.93 1.87 1.46 1.45 1.29 1.18 1.57 1.46 1.45 1.29 1.18 1.55 1.54 1.40 1.31 1.23 1.23 1.08 1.48 1.85 1.56 1.57 1.46 1.45 1.29 1.18 1.55 1.54 1.40 1.31 1.23 1.23 1.08 1.48 1.86 1.56 1.57 1.46 1.45 1.29 1.18 1.55 1.54 1.40 1.31 1.23 1.23 1.08 1.48 1.85 1.56 1.57 1.36 1.57 1.36 1.35 1.29 1.30 1.31 1.47 1.29 1.30 1.13 1.47 1.20 1.30 1.13 1.47 1.20 1.30 1.13 1.47 1.20 1.30 1.13 1.47 1.20 1.30 1.13 1.47 1.20 1.30 1.13 1.47 1.20 1.30 1.13 1.47 1.20 1.30 1.13 1.47 1.20 1.2		ALLETE		1.87	1.79	1.78	1.53	1.37	1.42	1,51	1.34	1.35	1.28	1.15	1.55	1.89	2.09	2 22
moren Corp. 145			1.70	2.17	2.16	2.38	2.17	1.86	1.86	1.70	1.57	1.46						
morison Electric Power 1,56 2,06 1,82 1,88 1,81 1,55 1,54 1,40 1,31 1,22 1,23 1,08 1,48 1,85 1,55 1,57 1,47		Amoren Corp.	1.45	2.16	1.95	1.93	1.67	1.46	1,45	1.29	1.18	0.90	0.83	0.78				
vangerd, finc. 1090 1002 1002 1002 1002 1002 1003 1004 1005 10		Amorican Electric Power		2.06	1.82	1.88	1.81	1.55	1.54	1.40	1.31	1,23	1.23	1.08				
visib Corp. 133 1.54 1.88 1.73 1.57 1.35 1.35 1.21 1.19 1.07 0.94 1.11 1.29 1.30 1.17 1.05 1.05 1.18 1.05 1.05 1.18 1.05 1.05 1.05 1.05 1.05 1.05 1.05 1.05	5	Avangrid, Inc.	0.90	1.02	1.02	0.93	0.83	0.72	N/A	N/A								
ack Hills 1.51 1.85 1.61 2.06 1.94 1.59 1.79 1.62 1.21 1.14 1.07 0.83 1.22 1.57 1.47 1.63 1.64 1.65 1.66 1.48 1.96 1.77 2.49 3.13 2.75 3.06 3.65	6	Avista Corp.	1.33	1.54	1.88	1.73	1.57	1,36	1.33	1.25	1.21							
enterPenit Energy 2.34 1.58 2.18 2.59 2.73 2.43 2.27 2.30 1.99 1.87 1.96 1.77 2.49 3.13 2.75 3.06 MS Energy Corp. 1.41 1.55 1.49 1.63 1.58 1.42 1.34 1.38 1.47 1.38 1.22 1.08 1.17 1.47 1.47 1.47 1.52 annol. Edition 1.41 1.55 1.49 1.63 1.58 1.42 1.34 1.38 1.47 1.38 1.22 1.08 1.17 1.47 1.47 1.47 1.52 annol. Edition 1.41 1.55 1.49 1.63 1.58 1.58 1.42 1.34 1.38 1.47 1.38 1.22 1.08 1.17 1.47 1.47 1.52 annol. Edition 1.41 1.55 1.49 1.63 1.58 1.59 1.50 1.50 1.50 1.50 1.50 1.50 1.50 1.50		Black Hills	1.51	1.85	1.61	2.06	1.94	1.59	1.79	1.62	1.21							
MS Energy Corp. 202 3.14 2.81 2.93 2.72 2.43 2.66 2.09 1.91 1.66 1.48 1.10 1.23 1.82 1.82 1.92 cominon Rosourcos 262 2.17 2.40 2.94 3.15 3.34 3.55 2.97 2.84 2.37 2.01 1.80 2.42 2.69 2.07 2.50 TE Energy 1.48 1.98 1.91 2.01 1.82 1.55 1.82 1.51 1.35 1.20 1.16 0.89 1.10 1.35 1.29 1.20 who Energy 1.40 1.41 1.55 1.49 1.91 1.92 1.75 1.82	8	CenterPoint Energy	2.34	1.58	2.18	2.59	2.73	2.43	2.27	2.30								
oneol. Edidono 1,41 1,55 1,49 1,63 1,58 1,42 1,34 1,38 1,47 1,38 1,47 1,38 1,22 1,08 1,17 1,47 1,47 1,47 1,47 1,47 1,47 1,47	9	CMS Energy Corp.	2.02	3,14	2.81													
cominen Resources 2 62 2.17 2.40 2.94 3.15 3.34 3.55 2.97 2.84 2.37 2.01 1.80 2.42 2.69 2.07 2.50 TEE Enorgy 1 18 189 1.91 2.01 1.82 1.55 1.62 1.51 1.55 1.20 1.16 0.89 1.10 1.35 1.29 1.39 1.39 1.40 Energy 1 20 1.44 1.33 1.41 1.35 1.29 1.28 1.19 1.12 1.10 0.91 1.06 1.15 N/A	10	Consol, Edison	1.41	1.55	1.49													
TE Energy 120 14.8 1.98 1.91 2.01 1.82 1.55 1.52 1.51 1.35 1.20 1.10 1.06 0.89 1.10 1.35 1.29 1.39 1.39 1.39 1.39 1.39 1.39 1.39 1.3	11	Dominion Resources	2.62	2.17	2.40													
uke Energy 1.20 1.41 1.33 1.41 1.35 1.29 1.28 1.49 1.10 1.11 1.00 0.01 1.06 1.06 1.15 1.07 1.08 1.08 1.09 1.09 1.00 1.06 1.06 1.06 1.07 1.08 1.08 1.07 1.08 1.08 1.09 1.09 1.09 1.00 1.00 1.06		DTE Energy																
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Page Bicthre 1.59 1.97 1.94 1.87 1.88 1.48 1.52 1.49 1.59 1.64 1.17 0.98 1.33 1.69 1.71 1.76 1.67 1.76 1.67 1.40 1.33 1.21 1.35 1.62 1.65 2.44 2.65 1.99 2.01 1.74 1.76 1.88 1.68 1.73 1.64 1.53 1.47 1.38 1.28 1.50 1.31 1.12 1.31 1.50 1.22 1.05 1.95 1.97 1.96 1.84 1.57 1.96		Edison Intil																
ntorgy Corp. 174	15	El Paso Electric	1.59															
Versign to Energy (and the proof of the proo		Entergy Corp.																
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rettEndrgy Corp. 193		Exolon Corp.																
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ectron Corp. 1.83 N/A N/A 2.75 2.29 2.11 2.08 1.82 1.57 1.53 1.41 1.34 1.54 1.74 1.77 1.82 1.62 1.62 1.62 1.63 1.64 1.74 1.77 1.71 1.62 1.62 1.63 1.64 1.65 1.65 1.65 1.65 1.65 1.65 1.65 1.65																1.87	1.70	1.73
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Pestar Energy 1.37 N/A N/A 1.94 1.95 1.49 1.44 1.33 1.26 1.20 1.10 0.93 1.10 1.36 1.30 1.41 201 Energy Inc. 1.59 2.25 1.97 2.06 1.88 1.68 1.55 1.50 1.51 1.41 1.32 1.19 1.30 1.53 1.40 1.38 1.69 1.59 1.69 1.69 1.69 1.69 1.89 1.88 2.00 1.85 1.67 1.68 1.50 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80																1 74	1.77	1.82
col Energy Inc. 1.59 2.25 1.97 2.06 1.88 1.66 1.55 1.50 1.51 1.41 1.32 1.19 1.30 1.53 1.40 1.38 1.60 1.51 1.41 1.32 1.19 1.30 1.53 1.40 1.38 1.60 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80													1.65	1.40	1.57	1.77	1.71	1.62
verage 1.69 1.99 1.88 2.00 1.85 1.67 1.68 1.60 1.51 1.43 1.35 1.25 1.63 1.90 1.78 1.80													1.10	0.93	1.10	1.36	1.30	1.41
1.00	42	Acei Energy Inc.	1.59	2.25	1,97	2.06	1.88	1.66	1.55	1.50	1.51	1.41	1.32	1.19	1.30	1.53	1.40	1.38
equan 1.60 1.97 1.83 1.91 1.74 1.57 1.53 1.49 1.47 1.37 1.31 1.15 1.48 1.71 1.71 1.73		Average													1.63	1.90	1.78	1.80
	44	Median	1.60	1.97	1.83	1.91	1.74	1.57	1.53	1.49	1.47	1.37	1.31	1.15	1.48	1,71	1.71	1.73

Sources:

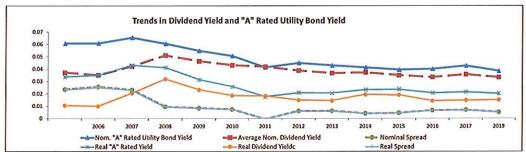
¹ The Value Line Investment Survey Investment Analyzer Software, downloaded on June 25, 2019.

The Value Line Investment Survey, August 16, September 13, and October 25, 2019,

Based on the average of the high and low pace for 2018 and the projected 2018 Book Value per share, published in The Value Line investment Survey, August 16, September 13, and October 25, 2019.

Electric Utilities (Valuation Metrics)

									Dividend Yi	eld ¹						
Line	Company	14-Year Average	2019 ²⁵	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006
-		(1)	(2)	(3)	(4)	(5)	(6)	m	(8)	(a)	(10)	(11)	(12)	(13)	(14)	(15)
1	ALLETE	3.95%	2.92%	2.99%	2.97%	3.56%	3.97%	3.92%	3.89%	4.49%	4.58%	5.03%	5.79%	4.37%	3.60%	3.16%
2	Aliant Energy	3.76%	3.00%	3.20%	3.07%	3.21%	3.60%	3.53%	3.74%	4.07%	4.28%	4.61%	5.73%	4.10%	3.13%	3.32%
3	Ameren Corp.	4.50%	2.73%	3.04%	3.12%	3.50%	3.96%	4.02%	4.61%	4.97%	5.28%	5.76%	5.98%	6.21%	4.88%	4.93%
5	American Electric Power	4.09% 3.76%	3.29%	3.60%	3.42%	3.54% 4.26%	3.80% N/A	3.83% N/A	4.23% N/A	4.56% N/A	4.95% N/A	4.90% N/A	5.50% N/A	4.20% N/A	3.40% N/A	4.06% N/A
6	Avangrid, Inc. Avista Corp.	3.74%	3.48%	2.93%	3.14%	3.39%	3.97%	3.99%	4.51%	4.55%	4.54%	4.76%	4.49%	3.39%	2.68%	2.52%
7	Black Hills	3.77%	2.87%	3.31%	2.75%	2.87%	3.55%	2.84%	3.19%	4.39%	4.64%	4.79%	6.17%	4.21%	3,40%	3.79%
8	CenterPoint Energy	4.52%	3.96%	4.09%	4.79%	4.70%	5.06%	3.94%	3.57%	4.04%	4.27%	5.29%	6.37%	4.98%	3.87%	4.39%
9	CMS Energy Corp.	3.27%	2.72%	3.03%	2.88%	2.99%	3.36%	3.59%	3.76%	4.16%	4.25%	3.96%	3.97%	2.69%	1.16%	N'A
10	Consol. Edison	4.45%	3.61%	3.68%	3.40%	3.62%	4.12%	4.38%	4.25%	4.07%	4.46%	5.16%	5.99%	5.67%	4.84%	5.04%
11	Dominion Resources	4.06%	5.00% 3.22%	4.72%	3.68%	3.82%	3.66%	3.43%	3.78%	4.06%	4.13%	4.41%	5.20%	3.77% 5.24%	3.32%	3.60% 4.86%
13	DTE Energy Duka Energy	4.75%	4.31%	4.54%	4.15%	4.26%	4.34%	4.26%	4.45%	4.68%	5.21%	5.71%	6.25%	5.15%	4.44%	N/A
14	Edison Int 1	3.08%	3.79%	3.84%	2.87%	2.81%	2.83%	2.62%	2.85%	2.97%	3.37%	3.66%	3.95%	2.69%	2.21%	2.58%
15	El Paso Electric	2.73%	2.62%	2.55%	2.49%	2.75%	3.13%	2.97%	2.99%	2.97%	2.11%	NA	NA	NA	N/A	NA
16	Entergy Corp.	4.10%	3.69%	4.41%	4.49%	4.55%	4.59%	4.47%	5.07%	4.91%	4.85%	4.20%	3.97%	2.92%	2.39%	2.82%
17	Eversource Energy	3.33%	3.02%	3.32%	3.14%	3.22%	3.34%	3.40%	3.45%	3.52%	3.23%	3.64%	4.16%	3.25%	2.60%	3.27%
18	Evergy, Inc. Exelon Corp.	3.22%	3.22%	N/A 3.32%	N/A 3.51%	N/A 3.75%	N/A 3.88%	N/A 3.69%	N/A 4.69%	N/A 5.73%	N/A 4.96%	N/A 4.95%	N/A 4.26%	N/A 2.78%	N/A 2.48%	N/A 2.83%
20	FirstEnergy Corp.	4.38%	3.75%	5.17%	4.62%	4.31%	4.23%	4.26%	4.26%	4.90%	5.23%	5.76%	5.09%	3.21%	3.12%	3.40%
21	Fortis Inc.	3.68%	3.69%	4.07%	3.69%	3.80%	3.76%	3.88%	3.84%	3.64%	3.58%	3.80%	4.21%	3.76%	3.01%	2.79%
22	Great Plains Energy	4.52%	N/A	N'A	3.58%	3.64%	3.76%	3.62%	3.84%	4.06%	4.15%	4.49%	5.03%	6.96%	5.49%	5.60%
23	Havaian Elec.	4.63%	3.16%	3.54%	3.65%	3.99%	4.05%	4.76%	4.72%	4.70%	5.04%	5.51%	6.89%	5.00%	5.18%	4.59%
24	IDACORP, Inc.	3.22%	2.52%	261%	2.58%	2.77%	3.06%	3.12%	3.21%	3.28%	3.10%	3.44%	4.45%	3.95%	3.55%	3.39%
25 26	MGE Energy NextEra Energy, Inc.	3.19%	2.07%	2.16%	1.95%	2.23%	2.78%	2.78%	2.91%	3.65%	3.96%	3.90%	3.55%	3.02%	2.65%	3.40%
27	NorthWestern Corp	4.09%	3.43%	3.86%	3.52%	3.43%	3.61%	3.30%	3.66%	4.17%	4.51%	4.93%	5.75%	5.38%	4.09%	3.65%
28	OGE Energy	3.62%	3.69%	3.96%	3.61%	3.87%	3.51%	2.63%	2.48%	2.94%	3.06%	3.68%	4.96%	4.52%	3.77%	3.99%
29	Otter Tail Corp.	4.15%	279%	2.92%	3.12%	3.87%	4.33%	4.14%	4.11%	5.21%	5.57%	5.68%	5.38%	3.63%	3.46%	3.92%
30	PG&E Corp.	3.70%	N'A	N/A	2.42%	3.22%	3.45%	3.96%	4.20%	4.25%	4.24%	4.08%	4.26%	4.01%	3.07%	3.22%
31	Pinnade West Capital	4.53%	3.35%	3.55% 2.79%	3.16% 2.53%	3.46% 2.69%	3.88%	4.09% 2.79%	3.96%	5.32%	4.81%	5.43%	4.76%	6.17%	4.75%	4.67%
32	PNM Resources Portland General	3.26%	2.97%	3.27%	2.92%	3.06%	3.27%	3.34%	3.67%	4.11%	4.37%	5.20%	5.36%	4.28%	3.34%	254%
34	PPL Corp.	4.45%	5.44%	5.61%	4.24%	4.25%	4.55%	4.45%	4.81%	5.07%	5.10%	5.12%	4.51%	3.10%	2.69%	3.41%
35	Public Serv. Enterprise	3.81%	3.37%	3.49%	3.74%	3.78%	3.81%	3.92%	4.35%	4.55%	4.24%	4.30%	4.30%	3.26%	2.73%	3.47%
36	SCANA Corp.	4.37%	N/A	N/A	4.03%	3.29%	3.90%	4.05%	4.15%	4.25%	4.78%	4.93%	5.67%	4.92%	4.29%	4.21%
37	Sempra Energy	2.95%	3.04%	3.20%	2.92%	2.92%	2.71%	2.61%	3.03%	3.71%	3.65%	3.06%	3.23%	2.62%	2.08%	4.52%
38	Southern Co. Vectran Corp.	4.74%	4.87% N/A	5.27% N/A	4.63%	4.42% 3.31%	4.78% 3.60%	4.69% 3.62%	4.61%	4.29%	4.63%	5.13% 5.53%	5.52% 5.65%	4.58%	4.53%	4.52%
40	WEC Energy Group	3.05%	2.86%	3.38%	3.31%	3.35%	3.49%	3,40%	3.49%	3.24%	3.35%	2.97%	3.16%	2.41%	2.14%	2.18%
41	Wester Energy	4.37%	N/A	N'A	3.00%	2.90%	3.73%	3.88%	4.27%	4.57%	4.84%	5.32%	6.27%	5.22%	4.16%	4.28%
42	Xoal Energy Inc.	3.92%	2.85%	3.25%	3.10%	3.33%	3.69%	3.83%	3.86%	3.90%	4.20%	4.54%	5.14%	4.70%	4.05%	4.40%
43	Average	3.90%	3.32%	3.56%	3.34%	3.49%	3.71%	3.66%	3.87%	4.18%	4.30%	4.63%	5.09%	4.21%	3.51%	3.71%
44	Median	3.87%	3.22%	3.36%	3.15%	3.43%	3.71%	3.76%	3.85%	4.18%	4.42%	4.76%	5.14%	4.21%	3.40%	3.60%
45	20-Yr Treasury Yields ³	3.40%	2.45%	3.02%	2.65%	2.23%	2.55%	3.07%	3.12%	2.54%	3.62%	4.03%	4.11%	4.36%	4.91%	4.99%
45	20-Yr TIPS ³	1.26%	0.65%	0.94%	0.75%	0.66%	0.78%	0.87%	0.75%	0.21%	1.19%	1.73%	2.21%	2.19%	2.35%	231%
47	Implied Inflation*	2.12%	1.80%	2.06%	1.89%	1.56%	1.75%	2.19%	2.35%	2.33%	240%	2.26%	1.85%	2.13%	2.49%	2.62%
48	Real Dividend Yield ^e	1.74%	1.50%	1.47%	1.42%	1.90%	1.93%	1.44%	1.49%	1.81%	1.85%	2.32%	3.16%	2.04%	0.99%	1.06%
	Utility															
49	Nominal "A" Rated Yield	4.87%	3.84%	4.25%	4.00%	3.93%	4.12%	4.28%	4.45%	4.13%	5.04%	5.46%	6.04%	6.53%	6.07%	6.07%
50	Real "A" Rated Yield	2.70%	201%	2.14%	207%	2.34%	2.33%	2.04%	2.08%	1.76%	2.58%	3.13%	4.11%	4.31%	3.49%	3.36%
	Spreads (Utility Bond - Stock)											0.000	0.000	070000	212200	2/2/200
51	Nominal Spread	0.97%	0.51%	0.69%	0.66%	0.44%	0.40%	0.61%	0.61%	-0.05%	0.74%	0.84%	0.95%	2.32%	2.57%	2.36%
52	Real Spread*	0.95%	0.50%	0.63%	0.65%	0.44%	0.40%	0.60%	0.59%	-0.05%	0.72%	0.82%	0.93%	2.27%	2.50%	2.30%
53	Spreads (Treasury Bond - Stock)	-0.50%	-0.87%	-0.54%	-0.69%	-1.26%	-1.17%	-0.59%	-0.75%	-1.64%	-0.65%	-0.60%	-0.98%	0.15%	1.40%	1.28%
54	Rea [®]	-0.50%	-0.85%	-0.53%	-0.68%	-1.24%	-1.15%	-0.58%	-0.73%	-1.64%	-0.67%	-0.58%	-0.93%	0.15%	1.37%	1.25%
04	rea	-0.43%	-V.03%	-0.53%	-0.00%	-1.24%	-1.19%	-0.00%	-0.13%	-1.00%	-0.01%	-0.00%	43174	3.13%	1.3174	1237



- Sources:

 ¹ The Value Line Investment Survey Investment Analyzer Software, downloaded on June 25, 2019.

 ² The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

 ³ St. Louis Federal Reserve: Economic Research, http://research.sto.uisted.org.

 ¹ www.modys.com, Bond Yelds and Key Indicators, Prough October 31, 2019.

 Notes:

 ¹ Based on the everage of the high and low price for 2017 and the projected 2017 Dividends Declared por share, published in the Value Line Investment Survey, August 16, September 13, and October 25, 2019.

 ¹ Line 47 = (1 + Line 45) (1 + Line 45) 1.

 ¹ Line 48 = (1 + Line 45) (1 + Line 47) 1.

 ¹ The syread being measured here is the nominal A-rated utility bond yield over the average nominal utility dividend yield; (Line 49 Line 43).

 ¹ The syread being measured here is the neal A-rated utility bond yield over the average real utility dividend yield; (Line 49 Line 43).

 ¹ The syread being measured here is the neal A-rated utility bond yield over the average real utility dividend yield; (Line 45 Line 43).

 ¹ The syread being measured here is the neal 20-Year Tiersury yield over the average nominal utility dividend yield; (Line 45 Line 43).

 ¹ The syread being measured here is the real 20-Year Tiersury yield over the average real utility dividend yield; (Line 45 Line 43).

Electric Utilities (Valuation Metrics)

								Divid	iend per S	haro¹						
	_	14-Year			141111											
Lino	Company	Average (1)	2019 ² (2)	<u>2018</u> (3)	2017 (4)	2016 (5)	2015 (6)	2014 (7)	2013 (8)	2012 (9)	(10)	2010 (11)	2009 (12)	2008 (13)	2007 (14)	2006 (15)
					, ,	• •	• •	• • •		1-2	,,	,	(/	(1.5)	14	1107
1	ALLETE	1.90	2.35	2.24	2.14	2.08	2.02	1.96	1.90	1.84	1.78	1.76	1.76	1.72	1.64	1.45
2	Alliant Energy	0.96	1.42	1.34	1.26	1.18	1.10	1.02	0.94	0.90	0.85	0.79	0.75	0.70	0.64	0.58
3	Ameren Corp.	1.86	1.93	1.85	1.78	1.72	1.66	1.61	1.60	1,60	1.56	1.54	1,54	2.54	2.54	2.54
4	American Electric Power	1.99	2.72	2.53	2.39	2.27	2.15	2.03	1,95	1.88	1.85	1.71	1.64	1.64	1.58	1.50
5	Avangrid, Inc.	1.74	1.76	1.74	1.73	1.73	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6	Avista Corp.	1.11	1.55	1.49	1.43	1.37	1.32	1.27	1.22	1.16	1.10	1.00	0.81	0.69	0.60	0.57
7	Black Hills	1.58	2.05	1.93	1.81	1.68	1.52	1.56	1.52	1.48	1,46	1.44	1.42	1,40	1.37	1.32
8	CenterPoint Energy	0.90	1.16	1.12	1.35	1.03	0.99	0.95	0.83	0.81	0.79	0.78	0.76	0.73	0.68	0.60
9	CMS Energy Corp.	0.95	1.53	1.43	1.33	1.24	1.16	1.08	1.02	0.96	0.84	0.66	0.50	0.36	0.20	N/A
10	Consol. Edison	2.53	2.96	2.85	2.76	2.68	2.60	2.52	2.46	2.42	2.40	2.38	2.36	2.34	2.32	2.30
11	Dominion Resources	2.30	3.67	3.34	3.04	2.80	2.59	2.40	2.25	2.11	1.97	1.83	1.75	1.58	1.46	1.38
12	DTE Energy	2.67	3.85	3.59	3.36	3.06	2.84	2.69	2.59	2.42	2.32	2.18	2.12	2.12	2.12	2.08
13	Duke Energy	3.13	3.75	3.64	3,49	3.36	3.24	3.15	3.09	3.03	2.97	2.91	2.82	2.70	2.58	N/A
14	Edison int'i	1.59	2.46	2.43	2,23	1.98	1.73	1.48	1.37	1.31	1.29	1.27	1.25	1.23	1.18	1.10
15	El Paso Electric	1.16	1.52	1.42	1.32	1.23	1.17	1.11	1.05	0.97	0.66	N/A	N/A	N/A	N/A	N/A
16	Entergy Corp.	3,20	3.66	3.58	3.50	3.42	3.34	3.32	3.32	3.32	3.32	3.24	3.00	3.00	2.58	2.16
17	Eversource Energy	1.38	2.14	2.02	1.90	1.78	1.67	1.57	1,47	1.32	1.10	1.03	0.95	0.83	0.78	0.73
18	Evergy, Inc.	1.94	1.94	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.33 N/A	N/A	N/A	0.73 N/A
19	Exelon Corp.	1.66	1.45	1.38	1.31	1.26	1.24	1.24	1.46	2,10	2.10	2.10	2.10	2.05	1.82	1.64
20	FirstEnergy Corp.	1.83	1.52	1.82	1.44	1.44	1.44	1.44	1.65	2.20	2.20	2.10	2.10	2.00	2.05	1.85
21	Fortis Inc.	1,27	1.85	1.75	1.65	1.55	1.43	1.30	1.25	1.21	1.17	1.12	1,04	1.00	0.82	0.67
22	Great Plains Energy	1.11	N/A	N/A	1.10	1.06	1.00	0.94	0.88	0.86	0.84	0.83	0.83	1.66		
23	Hawailan Elec.	1.24	1.28	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1,24	1.24		1.66	1.66
24	IDACORP, Inc.	1.65	2.56	2.40	2.24	2.08	1.92	1.76	1.57	1.37	1.20			1.24	1.24	1.24
25	MGE Energy	1.10	1.38	1.32	1.26	1.21	1.16	1.11	1.07	1.04		1.20	1.20	1.20	1.20	1.20
26	NextEra Energy, Inc.	2.78	5.00	4.44	3.93	3.48	3.08	2.90	2.64	2.40	1.01	0.99	0.97	0.96	0.94	0.93
27	NorthWestern Corp	1.65	2.30	2.20	2.10	2.00					2.20	2.00	1.89	1.78	1.64	1.50
28	OGE Energy	0.95	1.52	1.40	1.27		1.92	1.60	1.52	1.48	1.44	1.36	1.34	1.32	1.28	1.24
29	Otter Tail Corp.	1.23	1.40			1.16	1.05	0.95	0.85	0.80	0.76	0.73	0.71	0.70	0.68	0.67
30	PG&E Corp.	1.23		1.34	1.28	1.25	1.23	1.21	1.19	1.19	1,19	1.19	1.19	1.19	1,17	1.15
31	Pinnacle West Capital		N/A	N/A	1.55	1.93	1.82	1.82	1.82	1.82	1.82	1.82	1.68	1.56	1,44	1.32
32	PNM Resources	2.38	3.04	2.87	2.70	2.56	2.44	2.33	2.23	2.67	2.10	2.10	2.10	2.10	2.10	2.03
33	Portland General	0.77	1.18	1.09	0.99	0.88	0.80	0.76	0.68	0.58	0.50	0.50	0.50	0.61	0.91	0.86
34	PPL Corp.	1.12	1.52	1,43	1.34	1.26	1.18	1.12	1.10	1.08	1.06	1 04	1.01	0.97	0.93	0.68
35		1.44	1.65	1,64	1.58	1.52	1.50	1.49	1,47	1.44	1,40	1.40	1.38	1.34	1.22	1.10
	Public Serv. Enterprise	1.47	1.88	1.80	1.72	1.64	1.56	1.48	1,44	1.42	1.37	1.37	1.33	1.29	1.17	1.14
36	SCANA Corp.	2.00	N/A	N/A	2.45	2.30	2.18	2.10	2.03	1.98	1.94	1 90	1.88	1.84	1.76	1.68
37	Sempra Energy	2.36	3.87	3.58	3.29	3.02	2.80	2.64	2.52	2.40	1,92	t 56	7.56	1.37	1.24	1.20
38	Southern Co.	1.98	2.46	2.38	2.30	2.22	2.15	2.08	2.01	1.94	1.87	1.80	1.73	1.66	1.60	1.54
39	Vectren Corp.	1.42	N/A	N/A	1.71	1.62	1.54	1.46	1.43	1.41	1.39	1.37	1.35	1.31	1.27	1.23
40	WEC Energy Group	1.33	2.36	2.21	2.08	1.98	1,74	1.56	1.45	1.20	1.04	0.80	0.68	0.54	0.50	0.46
41	Westar Energy	1.30	N/A	N/A	1.60	1.52	1.44	1.40	1.36	1.32	1.28	1.24	1.20	1.16	1.08	0.98
42	Xcel Energy Inc.	1.17	1.62	1.52	1.44	1.36	1.28	1.20	1.11	1.07	1.03	1.00	0.97	0.94	0.91	88.0
43	Average	1.66	2.22	2.12	1.97	1.86	1.76	1.67	1.61	1.59	1.51	1.47	1.42	1.42	1.36	1.27
44	Industry Average Growth	4.40%	4.84%	7,61%	6.14%	5.60%	5.24%	3.58%	1.23%	5.69%	2.49%	3.36%	-0.08%	5.06%	6.45%	

Sources:

PG&E is excluded from 2017, 2018 and 2019 average calculations due to their Dividend Suspension.

¹ The Value Line Investment Survey Investment Analyzer Software, downloaded on June 25, 2019.

² The Value Line Investment Survey, August 16, September 13, and October 25, 2019. Notes:

Electric Utilities (Valuation Metrics)

									Earnings	per Share	ı					
	_	14-Your														
Line	Company	<u>Average</u> (1)	2019 ² (2)	2018 (3)	2017 (4)	<u>2016</u> (5)	2015 (6)	2014 (7)	2013 (8)	2012 (9)	<u>2011</u> (10)	201) (11)	2009 (12)	2008 (13)	2007 (14)	2006 (15)
1	ALLETE	2.85	3.40	3.38	3.13	3.14	3.38	2.90	2.63	2.58	2.65	2.19	1.89	2.82	3.08	2.77
2	Alliant Energy	1.57	2.25	2.19	1.99	1.65	1.69	1.74	1.65	1.53	1.38	1.38	0.95	1.27	1.35	1.03
3	Ameron Corp.	2.71	3.30	3.32	2.77	2.68	2.38	2.40	2.10	2,41	2.47	2.77	2.78	2.88	2.98	2.66
4	American Electric Power	3.31	4.10	3.90	3.62	4.23	3.59	3.34	3.18	2.98	3.13	2.60	2.97	2.99	2.86	2.86
5	Avangrid, Inc.	1.73	2.20	1.92	1.67	1.98	0.86	N/A	N/A	N/A	N/A	N/A	N/A	2.99 N/A	2.66 N/A	2.86 N/A
6	Avista Corp.	1.75	2.95	2.07	1.95	2.15	1.89	1.84	1.85	1.32	1.72	1.65	1,58	1.36	0.72	1.47
7	Black Hills	2.38	3.45	3.47	3.38	2.63	2.83	2.89	2.61	1.97	1.01	1.66	2.32	0.18	2.68	
8	ConterPoint Energy	1,22	1,50	0.74	1.57	1.00	1.08	1.42	1.24	1.35						2.21
9	CMS Energy Corp.	1.57	2.50	2.32	2.17	1.98	1.89	1.74	1.66		1.27	1.07	1.01	1.30	1.17	1.33
10	Consol. Edison	3.72	4.05	4.55	4.10	3,94	4.05	3.62	3.93	1.53	1.45	1.33	0.93	1.23	0.64	0.64
11	Dominion Resources	2.87	2.00	3.25	3.53	3.44	3.20	3.05	3.93	3.86	3.57	3.47	3.14	3.36	3.48	2.95
12	DTE Energy	4.19	6.25	6.17	5.73	4.83	4.44			2.75	2.76	2.89	2.64	3.04	2.13	2.40
13	Duka Energy	3.85	5.00	4.13				5.10	3.76	3.88	3.67	3.74	3.24	2.73	2.66	2.45
14	Edison Int'i	3.48	4.60		4.22	3.71	4.10	4.13	3.98	3.71	4.14	4.02	3.39	3.03	3.60	2.73
15	El Paso Electric	2.06		-1.26	4.51	3.94	4.15	4.33	3.78	4.55	3.23	3.35	3.24	3.68	3.32	3.28
16	Entergy Corp.		2.45	2.07	2.42	2.39	2.03	2.27	2.20	2.26	2.48	2.07	1.50	1.73	1.63	1.27
17		5,98	5.60	5.88	5.19	6.88	5.81	5.77	4.96	6.02	7.55	6.6€	6.30	6.20	5.60	5.36
18	Eversource Energy	2.36	3.45	3.25	3,11	2.96	2.76	2.58	2.49	1.89	2.22	2.10	1.91	1.86	1.59	0.82
19	Evergy, Inc.	2.80	2.80	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Exelon Corp.	3.00	3.00	2.07	2.78	1.80	2.54	2.10	2.31	1.92	3.75	3.87	4.29	4.10	4.03	3.50
20	FirstEnergy Corp.	2.68	2.55	1.33	2.73	2.10	2.00	0.85	2.97	2.13	1.88	3.25	3.32	4.38	4.22	3.82
21	Fortis Inc.	1.82	2.60	2.52	2.66	1.89	2.11	1.38	1.63	1.65	1.74	1.62	1.51	1.52	1.29	1.36
22	Great Plains Energy	1.33	N/A	N/A	-0.06	1.61	1.37	1.57	1.62	1.35	1.25	1.53	1.03	1.16	1.85	1.62
23	Hawaiian Elec.	1.52	1.95	1.85	1.64	2.29	1.50	1.64	1.62	1.67	1.44	1.21	0.91	1.07	1.11	1.33
24	IDACORP, Inc.	3.37	4.45	4.49	4.21	3.94	3.87	3.85	3.64	3.37	3.36	2.95	2.64	2.18	1.86	2.35
25	MGE Energy	1.94	2.60	2.43	2.20	2.18	2.06	2.32	2.16	1.66	1.76	1.67	1.47	1.59	1.51	1.37
26	NoxtEra Energy, Inc.	5.13	7.75	6.67	6.50	5.78	6.06	5.60	4.83	4.56	4.82	4.74	3.97	4.07	3.27	3.23
27	NorthWestern Corp	2.54	3.65	3.40	3.34	3.39	2.90	2.99	2.46	2.26	2.53	2.14	2.02	1.77	1.44	1.31
28	OGE Energy	1.68	2.10	2.12	1.92	1.69	1.69	1.98	1,94	1.79	1.73	1.50	1.33	1,25	1.32	1.23
29	Ofter Tall Corp.	1,38	2.15	2.08	1.86	1.60	1.56	1.55	1.37	1.05	0.45	0.38	0.71	1.09	1.78	1.69
30	PG&E Corp.	1.49	N/A	-13.25	3.50	2.83	2.00	3.06	1.83	2.07	2.78	2.82	3.03	3.22	2.78	2.76
31	Pinnacio West Capital	3.49	4.75	4.54	4.43	3.95	3.92	3.58	3.66	3.50	2.99	3,08	2.26	2.12	2.96	3.17
32	PNM Resources	1.31	2.15	1.66	1.92	1.65	1.64	1.45	1.41	1.31	1.08	0.87	0.58	0.11	0.76	1.72
33	Portland General	1.92	2.40	2.37	2.29	2.16	2.04	2.18	1.77	1.87	1.95	1.66	1.31	1.39	2.33	1.14
34	PPL Corp.	2.36	2.40	2.58	2.11	2.79	2.37	2.38	2.38	2,61	2.61	2.29	1.19	2.45	2.63	2.29
35	Public Serv. Enterprise	2.86	3.80	2.78	2.82	2.83	3.30	2.99	2.45	2.44	3.11	3.07	3.08	2.90	2.59	1.85
36	SCANA Corp.	3.30	N/A	N/A	4.20	4.16	3.81	3.79	3.39	3.15	2.97	2.98	2.85	2.95	2.74	2.59
37	Sompra Energy	4.62	5.75	5.48	4.63	4.24	5.23	4.63	4.22	4.35	4.47	4.02	4.78	4.43	4.26	4.23
38	Southorn Co.	2.64	3.05	3.00	3.21	2.83	2.84	2.77	2.70	2.67	2.55	2.36	2.32	2.25	2.28	2.10
39	Voctron Corp.	1.94	N/A	N/A	2.60	2.55	2.39	2.02	1,86	1,94	1.73	1.64	1.79	1.63	1.83	1.44
40	WEC Energy Group	2.34	3.53	3.34	3.14	2.96	2.34	2.59	2.51	2.35	2.18	1.92	1.60	1.52	1.42	1.32
41	Wostar Energy	1.96	N/A	N/A	2.27	2.43	2.09	2.35	2.27	2.15	1.79	1.80	1.28	1.31	1.84	1.88
42	Xcol Energy Inc.	1.89	2.60	2.47	2.30	2.21	2.10	2.03	1.91	1.85	1.72	1.56	1.49	1.46	1.35	1.35
43	Average	2.64	3.38	3.01	3.02	2.91	2.78	2.77	2,60	2.51	2.53	2.45	2.26	2.29	2.32	2,17
44	Industry Average Growth	3,54%	12.18%	-0.18%	3.68%	4.86%	0.28%	6.70%	3.34%	-0.86%	3,54%	8.08%	-1.51%	-1,47%	6.98%	

Sources:

<sup>The Value Line Invostment Survey Investment Analyzer Software, downloaded on June 25, 2019,
The Value Line Invostment Survey, August 16, September 13, and October 25, 2019.</sup> Notes:
PG&E is excluded from 2017, 2018, and 2019 average calculations due to their Dividend Suspension.

Electric Utilities (Valuation Metrics)

			Cash F	low / Capit	al Spending	
	•					3 - 5 yr
Line	Company	2017	<u> 2018</u>	2019	<u>2020</u>	Projection
		(1)	(2)	(3)	(4)	(5)
1	ALLETE	1.61x	1.22x	0.71x	1.10x	1.71x
2	Alliant Energy	0.49x	N/A	0.65x	0.71x	0.85x
3	Ameren Corp.	0.75x	0.80x	0.79x	0.62x	0.98x
4	American Electric Power	0.67x	0.68x	0.69x	0.78x	0.88x
5	Avangrid, Inc.	0.57x	0.85x	0.68x	0.56x	0.69x
6	Avista Corp.	0.77x	0.78x	0.90x	0.86x	1.00x
7	Black Hills	1.17x	0.87x	0.54x	0.77x	1.22x
8	CenterPoint Energy	1.22x	0.98x	0.97x	1.05x	1.15x
9	CMS Energy Corp.	0.89x	0.77x	0.78x	0.76x	1.00x
10	Consol. Edison	0.76x	0.82x	0.80x	0.77x	0.90x
11	Dominion Resources	0.81x	1.04x	0.78x	1.00x	1.23x
12	DTE Energy	0.94x	0.84x	0.65x	1.05x	1.23x
13	Duke Energy	0.87x	0.81x	0.78x	0.86x	1.08x
14	Edison Int'i	0.94x	0.34x	0.75x	0.76x	0.87x
15	El Paso Electric	1.04x	0.86x	0.91x	1.00x	0.94x
16	Entergy Corp.	0.76x	0.73x	0.70x	0.85x	0.89x
17	Eversource Energy	0.79x	0.83x	0.78x	0.95x	1.26x
18	Evergy, Inc.	N/A	1.17x	1.29x	1.31x	1.65x
19	Exelon Corp.	1.06x	1.05x	1.20x	1.32x	1,52x
20	FirstEnergy Corp.	1.03x	0.76x	0.94x	1.02x	1.19x
21	Fortis Inc.	0.76x	0.72x	0.58x	0.77x	0.87x
22	Hawaiian Elec.	0.81x	0.85x	1.13x	1.11x	1.11x
23	IDACORP, Inc.	1.33x	1.42x	1.24x	1.24x	1.31x
24	MGE Energy	1.19x	0.66x	0.80x	1.13x	1.21x
25	NextEra Energy, Inc.	0.53x	0.56x	0.82x	0.94x	1.13x
26	NorthWestern Corp	1.21x	1.23x	1.08x	1.11x	1.38x
27	OGE Energy	0.81x	1.30x	1.21x	1.40x	1.58x
28	Otter Tail Corp.	1.10x	1.49x	0.73x	0.46x	1.36x
29	PG&E Corp.	0.82x	-0.58x	N/A	N/A	N/A
30	Pinnacle West Capital	0.76x	1.06x	1.03x	1.10x	1.21x
31	PNM Resources	0.84x	0.82x	0.71x	0.69x	0.87x
32	Portland General	1.07x	1.00x	0.99x	0.90x	1.52x
33	PPL Corp.	0.82x	0.93x	0.92x	1.06x	1.54x
34	Public Serv. Enterprise	0.64x	0.70x	1.13x	1.10x	1.29x
35	Sempra Energy	0.67x	0.80x	0.65x	0.91x	1.46x
36	Southern Co.	0.90x	0.83x	0.87x	1.01x	1.38x
37	WEC Energy Group	0.92x	0.90x	0.68x	0.68x	1.10x
38	Xcel Energy Inc.	0.84x	0.77x	0.69x	0.96x	1.10x
	4 ,					
39	Average	0.90x	0.86x	0.85x	0.94x	1.18x
40	Median	0.84x	0.83x	0.79x	0.95x	1.19x

Sources

The Value Line Investment Survey Investment Analyzer Software, downloaded on June 25, 2019.

The Value Line Investment Survey, August 16, September 13, and October 25, 2019. Notes:

Based on the projected Cash Flow per share and Capital Spending per share.

Proxy Group

		Credit	Ratings ¹	Common I	Equity Ratios
<u>Line</u>	Company	<u>S&P</u> (1)	Moody's (2)	MI ¹ (3)	Value Line ² (4)
		(- /	(-/	(-)	(-)
1	ALLETE, Inc.	BBB+	Baa1	59.2%	60.1%
2	Alliant Energy Corporation	A-	Baa1	42.7%	46.7%
3	American Electric Power Company, Inc.	Α-	Baa1	42.6%	46.8%
4	Avangrid, Inc.	BBB+	Baa1	69.4%	73.8%
5	CMS Energy Corporation	BBB+	Baa1	28.7%	30.7%
6	DTE Energy Company	BBB+	Baa2	41.0%	45.8%
7	Duke Energy Corporation	A-	Baa1	43.1%	46.2%
8	Evergy, Inc.	A-	Baa2	54.0%	60.0%
9	Hawaiian Electric Industries, Inc.	BBB-	N/A	51.5%	51.7%
10	NextEra Energy, Inc.	A-	Baa1	45.0%	56.0%
11	NorthWestern Corporation	BBB	Baa2	47.8%	47.8%
12	OGE Energy Corp.	BBB+	Baa1	56.0%	58.0%
13	Otter Tail Corporation	BBB	Baa2	54.5%	55.3%
14	Pinnacle West Capital Corporation	A-	A3	49.4%	53.0%
15	PNM Resources, Inc.	BBB+	Baa3	36.2%	38.6%
16	Portland General Electric Company	BBB+	A3	50.3%	53.5%
17	Southern Company	A-	Baa2	32.5%	37.6%
18	WEC Energy Group, Inc.	A-	Baa1	45.2%	49.4%
19	Xcel Energy Inc.	A-	Baa1	41.5%	43.6%
20	Average	BBB+	Baa1	46.9%	50.2%
21	Median			45.2%	49.4%
22	Ameren Missouri	BBB+3	Baa1 ³		51.9%⁴

Sources:

¹ S&P Global Market Intelligence, Downloaded on November 12, 2019.

² The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

³ Hevert direct at 11.

⁴ Sagel direct at 10.

Consensus Analysts' Growth Rates

		Zac	cks	N	A]	Yahoo!	Finance	Average of
		Estimated	Number of	Estimated	Number of	Estimated	Number of	Growth
<u>Line</u>	<u>Company</u>	Growth %1	Estimates	Growth %2	Estimates	Growth %3	Estimates	Rates
		(1)	(2)	(3)	(4)	(5)	(6)	(7)
1	ALLETE, Inc.	7.20%	N/A	7.07%	3	7.00%	6	7.09%
2	Alliant Energy Corporation	5.60%	N/A	5.69%	. 4	5.15%	10	5.48%
3	American Electric Power Company, Inc.	5.70%	N/A	5.64%	6	5.90%	11	5.75%
4	Avangrid, Inc.	7.40%	N/A	7.05%	3	6.00%	11	6.82%
5	CMS Energy Corporation	6.40%	N/A	6.94%	7	7.37%	19	6.90%
6	DTE Energy Company	6.00%	N/A	6.20%	6	3.66%	14	5.29%
7	Duke Energy Corporation	4.90%	N/A	4.24%	6	4.06%	18	4.40%
8	Evergy, Inc.	6.60%	N/A	8.98%	4	6.70%	10	7,43%
9	Hawaiian Electric Industries, Inc.	4.20%	N/A	5.58%	3	3.40%	6	4.39%
10	NextEra Energy, Inc.	8.00%	N/A	7.81%	5	7.99%	18	7.93%
11	NorthWestern Corporation	2.60%	N/A	3.50%	3	3.19%	6	3,10%
12	OGE Energy Corp.	4.50%	N/A	5.15%	3	3.40%	11	4.35%
13	Otter Tail Corporation	7.00%	N/A	7.40%	1	9.00%	0	7.80%
14	Pinnacle West Capital Corporation	6.10%	N/A	5.33%	6	5.11%	15	5.51%
15	PNM Resources, Inc.	5.50%	N/A	6.17%	6	6.22%	10	5.96%
16	Portland General Electric Company	4.60%	N/A	4.52%	5	4.40%	12	4,51%
17	Southern Company	4.50%	N/A	N/A	N/A	1.56%	20	3.03%
18	WEC Energy Group, Inc.	6.20%	N/A	6.09%	5	6.12%	15	6.14%
19	Xcel Energy Inc.	5.40%	N/A	N/A	N/A	5.20%	14	5.30%
20	Average	5.71%	N/A	6.08%	4	5.34%	12	5.64%
21	Median							5.51%

Sources:

¹ Zacks, http://www.zacks.com/, downloaded on November 1, 2019.

² S&P Global Market Intelligence, https://platform.mi.spglobal.com, downloaded on November 1, 2019.

³ Yahoo! Finance, http://www.finance.yahoo.com/, downloaded on November 1, 2019.

Yahoo! Finance next year number of estimates.

Constant Growth DCF Model (Consensus Analysts' Growth Rates)

<u>Line</u>	Company	13-Week AVG Stock Price ¹ (1)	Analysts' <u>Growth²</u> (2)	Annualized <u>Dividend³</u> (3)	Adjusted <u>Yield</u> (4)	Constant Growth DCF (5)
1	ALLETE, Inc.	\$86.14	7.09%	\$2.35	2.92%	10.01%
2	Alliant Energy Corporation	\$52.47	5.48%	\$1.42	2.85%	8.33%
3	American Electric Power Company, Inc.	\$92.03	5.75%	\$2.68	3.08%	8.83%
4	Avangrid, Inc.	\$50.37	6.82%	\$1.76	3.73%	10.55%
5	CMS Energy Corporation	\$62.65	6.90%	\$1.53	2.61%	9.51%
6	DTE Energy Company	\$129.40	5.29%	\$3.78	3.08%	8.36%
7	Duke Energy Corporation	\$93.48	4.40%	\$3.78	4.22%	8.62%
8	Evergy, Inc.	\$64.39	7.43%	\$1.90	3.17%	10.60%
9	Hawaiian Electric Industries, Inc.	\$44.66	4.39%	\$1.28	2.99%	7.39%
10	NextEra Energy, Inc.	\$225.09	7.93%	\$5.00	2.40%	10.33%
11	NorthWestern Corporation	\$72.85	3.10%	\$2.30	3.26%	6.35%
12	OGE Energy Corp.	\$43.46	4.35%	\$1.46	3.51%	7.86%
13	Otter Tail Corporation	\$52.96	7.80%	\$1.40	2.85%	10.65%
14	Pinnacle West Capital Corporation	\$94.60	5.51%	\$2.95	3.29%	8.80%
15	PNM Resources, Inc.	\$50.98	5.96%	\$1.16	2.41%	8.37%
16	Portland General Electric Company	\$56.32	4.51%	\$1.54	2.86%	7.36%
17	Southern Company	\$59.98	3.03%	\$2.48	4.26%	7.29%
18	WEC Energy Group, Inc.	\$92.85	6.14%	\$2.36	2.70%	8.83%
19	Xcel Energy Inc.	\$63.39	5.30%	\$1.62	2.69%	7.99%
20 21	Average Median	\$78.32	5.64%	\$2.25	3.10%	8.74% 8.62%

Sources:

S&P Global Market Intelligence, Downloaded on November 12, 2019.

 ² Schedule CCW-4.
 ³ The Value Line Investment Survey , August 16, September 13, and October 25, 2019.

Payout Ratios

		Dividend	s Per Share	Earnings	Per Share	Payou	ıt Ratio
<u>Line</u>	Company	2018	Projected	<u>2018</u>	Projected	2018	Projected
		(1)	(2)	(3)	(4)	(5)	(6)
1	ALLETE, Inc.	60.04	\$2.85	\$3.38	\$4.50	66.27%	CO 200/
	•	\$2.24	·	•			63.33%
2	Alliant Energy Corporation	\$1.34	\$1.74	\$2.19	\$2.80	61.19%	62.14%
3	American Electric Power Company, Inc.	\$2.53	\$3.40	\$3.90	\$5.00	64.87%	68.00%
4	Avangrid, Inc.	\$1.74	\$2.10	\$1.92	\$3.25	90.63%	64.62%
5	CMS Energy Corporation	\$1.43	\$2.00	\$2.32	\$3.25	61.64%	61.54%
6	DTE Energy Company	\$3.59	\$4.80	\$6.17	\$7.75	58.18%	61.94%
7	Duke Energy Corporation	\$3.64	\$4.05	\$4.13	\$5.75	88.14%	70.43%
8	Evergy, Inc.	\$1.74	\$2.50	\$2.50	\$3.50	69.60%	71.43%
9	Hawaiian Electric Industries, Inc.	\$1.24	\$1.50	\$1.85	\$2.25	67.03%	66.67%
10	NextEra Energy, Inc.	\$4.44	\$7.00	\$6.67	\$11.50	66.57%	60.87%
11	NorthWestern Corporation	\$2.20	\$2.70	\$3.40	\$4.00	64.71%	67.50%
12	OGE Energy Corp.	\$1.40	\$1.90	\$2.12	\$2.75	66.04%	69.09%
13	Otter Tall Corporation	\$1.34	\$1.65	\$2.06	\$2.50	65.05%	66.00%
14	Pinnacle West Capital Corporation	\$2.87	\$3.80	\$4.54	\$5.75	63.22%	66.09%
15	PNM Resources, Inc.	\$1.09	\$1.50	\$1.66	\$2.50	65.66%	60.00%
16	Portland General Electric Company	\$1.43	\$1.95	\$2.37	\$3.00	60.34%	65.00%
17	Southern Company	\$2.38	\$2.78	\$3.00	\$3.75	79.33%	74.13%
18	WEC Energy Group, Inc.	\$2.21	\$3.00	\$3.34	\$4.50	66.17%	66.67%
19	Xcel Energy Inc.	\$1.52	\$2.05	\$2.47	\$3.25	61.54%	63.08%
20	Average	\$2.12	\$2.80	\$3.16	\$4.29	67.69%	65.71%

Source:

The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

Sustainable Growth Rate

		3 to 5 Year Projections Sustain								Sustainable		
		Dividends	Earnings	Book Value	Book Value		Adjustment	Adjusted	Payout	Retention	Internal	Growth
Line	Company	Per Share	Per Share	Per Share	Growth	ROE	Factor	ROE	Ratio	Rate	Growth Rate	Rate
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
1	ALLETE, Inc.	\$2.85	\$4.50	\$48.75	3.09%	9.23%	1.02	9.37%	63.33%	36.67%	3.44%	3,54%
2	Alliant Energy Corporation	\$1.74	\$2.80	\$27.55	7.23%	10.16%	1.03	10.52%	62.14%	37.86%	3.98%	5.94%
3	American Electric Power Company, Inc.	\$3.40	\$5.00	\$47.50	4.25%	10.53%	1.02	10.75%	68.00%	32.00%	3,44%	4.80%
4	Avangrid, Inc.	\$2.10	\$3.25	\$52.75	1.54%	6.16%	1.01	6.21%	64.62%	35.38%	2.20%	2.20%
5	CMS Energy Corporation	\$2.00	\$3.25	\$24.50	7.86%	13.27%	1.04	13.77%	61.54%	38.46%	5.30%	7.88%
6	DTE Energy Company	\$4.80	\$7.75	\$73.50	5.49%	10.54%	1.03	10.83%	61.94%	38.06%	4.12%	6.61%
7	Duke Energy Corporation	\$4.05	\$5.75	\$68.75	2.67%	8.36%	1.01	8.47%	70.43%	29.57%	2.51%	2.92%
8	Evergy, Inc.	\$2.50	\$3.50	\$41.50	1.11%	8.43%	1.01	8.48%	71.43%	28.57%	2,42%	2.42%
9	Hawaiian Electric Industries, Inc.	\$1.50	\$2.25	\$24.25	4.08%	9.28%	1.02	9.46%	66.67%	33.33%	3,15%	4.09%
10	NextEra Energy, Inc.	\$7.00	\$11.50	\$85.50	3.66%	13.45%	1.02	13.69%	60.87%	39.13%	5.36%	10.26%
11	NorthWestern Corporation	\$2.70	\$4.00	\$45.00	3.12%	8.89%	1.02	9.03%	67.50%	32.50%	2.93%	3.21%
12	OGE Energy Corp.	\$1.90	\$2.75	\$23.50	3.22%	11.70%	1.02	11.89%	69.09%	30.91%	3.67%	3.71%
13	Otter Tail Corporation	\$1.65	\$2.50	\$23.25	4.81%	10.75%	1.02	11.01%	66.00%	34.00%	3.74%	5.73%
14	Pinnacle West Capital Corporation	\$3,80	\$5.75	\$55.75	3.66%	10.31%	1.02	10.50%	66.09%	33.91%	3.56%	3.91%
15	PNM Resources, Inc.	\$1.50	\$2.50	\$26.50	4.56%	9.43%	1.02	9.64%	60.00%	40.00%	3.86%	5.70%
16	Portland General Electric Company	\$1.95	\$3.00	\$32.50	2.97%	9.23%	1.01	9.37%	65.00%	35.00%	3.28%	3.44%
17	Southern Company	\$2.78	\$3.75	\$30.25	4.81%	12.40%	1.02	12.69%	74,13%	25.87%	3.28%	4.89%
18	WEC Energy Group, Inc.	\$3.00	\$4,50	\$36.75	3.45%	12.24%	1.02	12.45%	66.67%	33.33%	4.15%	4,15%
19	Xcel Energy Inc.	\$2.05	\$3.25	\$30.25	4.93%	10.74%	1.02	11.00%	63.08%	36.92%	4.06%	5.08%
20 21	Average Median	\$2.80	\$4.29	\$42.02	4.03%	10.27%	1.02	10.48%	65.71%	34.29%	3.60%	4.76% 4.15%

Sources and Notes:

Cols. (1), (2) and (3): The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

Col. (4): [Col. (3) / Page 2 Col. (2)] ^ (1/number of years projected) - 1. Col. (5): Col. (2) / Col. (3). Col. (6): [2 * (1 + Col. (4))] / (2 + Col. (4)).

Col. (7): Col. (6) * Col. (5).

Col. (8): Col. (1) / Col. (2).

Col. (9): 1 - Col. (8).

Col. (10): Col. (9) * Col. (7).

Col. (11): Col. (10) + Page 2 Col. (9).

Sustainable Growth Rate

<u>Line</u>	Company	13-Week Average Stock Price ¹ (1)	2018 Book Value Per Share ² (2)	Market to Book Ratio (3)	Common Outstanding 2018 (4)	n Shares g (in Millions) ² 3-5 Years (5)	Growth (6)	S Factor ³ (7)	V Factor ⁴ (8)	<u>S * V</u> (9)
1	ALLETE, Inc.	\$86.14	\$41.86	2.06	51.50	51.75	0.10%	0.20%	51.40%	0.10%
2	Alliant Energy Corporation	\$52.47	\$19.43	2.70	236.06	250.00	1.15%	3.12%	62.97%	1.96%
3	American Electric Power Company, Inc.	\$92.03	\$38.58	2.39	493.25	518.00	0.98%	2.35%	58.08%	1.36%
4	Avangrid, Inc.	\$50.37	\$48.88	1.03	309.01	309.00	- 0.00%	- 0.00%	2.97%	- 0.00%
5	CMS Energy Corporation	\$62.65	\$16.78	3.73	283.37	297.00	0.94%	3.52%	73.21%	2.58%
6	DTE Energy Company	\$129.40	\$56.27	2.30	181.93	200.00	1.91%	4.40%	56.52%	2.48%
7	Duke Energy Corporation	\$93.48	\$60.27	1.55	727.00	755.00	0.76%	1.18%	35.53%	0.42%
8	Evergy, Inc.	\$64.39	\$39.28	1.64	255.33	212.00	- 3.65%	- 5.99%	39.00%	- 2.33%
9	Hawaiian Electric Industries, Inc.	\$44.66	\$19.86	2.25	108.88	113.00	0.75%	1.68%	55.54%	0.93%
10	NextEra Energy, Inc.	\$225.09	\$71.43	3.15	478.00	535.00	2.28%	7.18%	68.27%	4.90%
11	NorthWestern Corporation	\$72.85	\$38.60	1.89	50.32	51.10	0.31%	0.58%	47.01%	0.27%
12	OGE Energy Corp.	\$43.46	\$20.06	2.17	199.70	200.00	0.03%	0.07%	53.85%	0.04%
13	Otter Tail Corporation	\$52.96	\$18.38	2.88	39.66	41.80	1.06%	3.04%	65.30%	1.99%
14	Pinnacle West Capital Corporation	\$94.60	\$46.59	2.03	112.10	114.00	0.34%	0.68%	50.75%	0.35%
15	PNM Resources, Inc.	\$50.98	\$21.20	2.40	79.65	85.00	1.31%	3.15%	58.42%	1.84%
16	Portland General Electric Company	\$56.32	\$28.07	2.01	89.27	90.00	0.16%	0.33%	50.16%	0.16%
17	Southern Company	\$59.98	\$23.92	2.51	1,033.80	1,090.00	1.06%	2.67%	60.12%	1.60%
18	WEC Energy Group, Inc.	\$92.85	\$31.02	2.99	315.52	315.50	- 0.00%	- 0.00%	66.59%	- 0.00%
19	Xcel Energy Inc.	\$63.39	\$23.78	2.67	514.04	530.00	0.61%	1.64%	62.49%	1.02%
20	Average	\$78.32	\$34.96	2.33	292.55	303.06	0.86%	2.24%	53.59%	1.38%

Sources and Notes:

S&P Global Market Intelligence, Downloaded on November 12, 2019.
 The Value Line Investment Survey, August 16, September 13, and October 25, 2019.
 Expected Growth in the Number of Shares, Column (3) * Column (6).
 Expected Profit of Stock Investment, [1 - 1 / Column (3)].

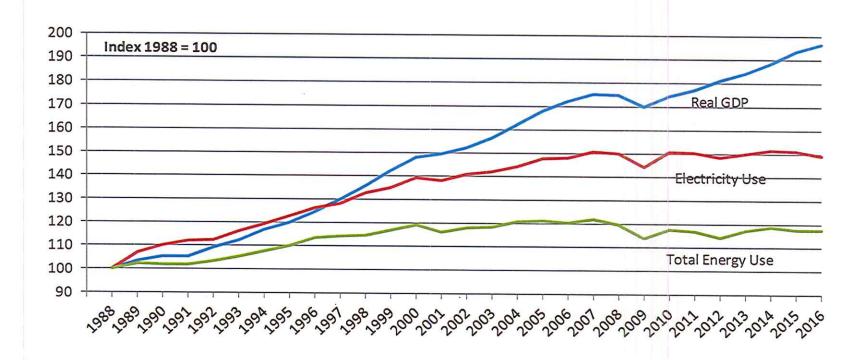
Constant Growth DCF Model (Sustainable Growth Rate)

<u>Line</u>	Company	13-Week AVG Stock Price ¹ (1)	Sustainable <u>Growth²</u> (2)	Annualized <u>Dividend³</u> (3)	Adjusted <u>Yield</u> (4)	Constant Growth DCF (5)
1	ALLETE, Inc.	\$86.14	3.54%	\$2.35	2.82%	6.36%
2	Alliant Energy Corporation	\$52.47	5.94%	\$1.42	2.87%	8.81%
3	American Electric Power Company, Inc.	\$92.03	4.80%	\$2.68	3.05%	7.85%
4	Avangrid, Inc.	\$50.37	2.20%	\$1.76	3.57%	5.77%
5	CMS Energy Corporation	\$62.65	7.88%	\$1.53	2.63%	10.51%
6	DTE Energy Company	\$129.40	6.61%	\$3.78	3.11%	9.72%
7	Duke Energy Corporation	\$93.48	2.92%	\$3.78	4.16%	7.09%
8	Evergy, Inc.	\$64.39	2.42%	\$1.90	3.02%	5.45%
9	Hawaiian Electric Industries, Inc.	\$44.66	4.09%	\$1.28	2.98%	7.07%
10	NextEra Energy, Inc.	\$225.09	10.26%	\$5.00	2.45%	12.71%
11	NorthWestern Corporation	\$72.85	3.21%	\$2.30	3.26%	6.47%
12	OGE Energy Corp.	\$43.46	3.71%	\$1.46	3.48%	7.19%
13	Otter Tail Corporation	\$52.96	5.73%	\$1.40	2.79%	8.52%
14	Pinnacle West Capital Corporation	\$94.60	3.91%	\$2.95	3.24%	7.15%
15	PNM Resources, Inc.	\$50.98	5.70%	\$1.16	2.40%	8.10%
16	Portland General Electric Company	\$56.32	3.44%	\$1.54	2.83%	6.27%
17	Southern Company	\$59.98	4.89%	\$2.48	4.34%	9.22%
18	WEC Energy Group, Inc.	\$92.85	4.15%	\$2.36	2.65%	6.80%
19	Xcel Energy Inc.	\$63.39	5.08%	\$1.62	2.69%	7.77%
20 21	Average Median	\$78.32	4.76%	\$2.25	3.07%	7.83% 7.19%

Sources:

S&P Global Market Intelligence, Downloaded on November 12, 2019.
 Schedule CCW-7, page 1.
 The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

Electricity Sales Are Linked to U.S. Economic Growth



Note:

1988 represents the base year. Graph depicts increases or decreases from the base year.

Sources:

U.S. Energy Information Administration Federal Reserve Bank of St. Louis

Multi-Stage Growth DCF Model

Line	13-Week AVG Annualized First Stage Second Stage Growth Line Company Stock Price ¹ Dividend ² Growth ³ Year 6 Year 7 Year 8 Year 9					Third Stage	Multi-Stage				
LITTE	Company	Stock Price	<u>Dividend²</u>	Growth ³	Year 6	Year 7	Year 8	Year 9	Year 10	Growth ⁴	Growth DCF
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1	ALLETE, Inc.	\$86.14	\$2.35	7.09%	6.59%	6.09%	5.60%	5.10%	4.60%	4.10%	7.54%
2	Alliant Energy Corporation	\$52.47	\$1.42	5.48%	5.25%	5.02%	4.79%	4.56%	4.33%	4.10%	
3	American Electric Power Company, Inc.	\$92.03	\$2.68	5.75%	5.47%	5.20%	4.92%	4.65%	4.37%		7.17%
4	Avangrid, Inc.	\$50.37	\$1.76	6.82%	6.36%	5.91%	5.46%	5.01%		4.10%	7.47%
5	CMS Energy Corporation	\$62.65	\$1.53	6.90%	6.44%	5.97%	5.50%	5.03%	4.55%	4.10%	8.41%
6	DTE Energy Company	\$129.40	\$3.78	5.29%	5.09%	4.89%	4.69%	4.50%	4.57%	4.10%	7.14%
7	Duke Energy Corporation	\$93.48	\$3.78	4.40%	4.35%	4.30%	4.05%		4.30%	4.10%	7.38%
8	Evergy, Inc.	\$64.39	\$1.90	7.43%	6.87%	6.32%	4.25% 5.76%	4.20%	4.15%	4.10%	8.39%
9	Hawaiian Electric Industries, Inc.	\$44.66	\$1.28	4.39%	4.34%	4.30%	4.25%	5.21%	4.65%	4.10%	7.89%
10	NextEra Energy, Inc.	\$225.09	\$5.00	7.93%	7.29%	6.66%		4.20%	4.15%	4.10%	7.13%
11	NorthWestern Corporation	\$72.85	\$2.30	3.10%	3.26%	3.43%	6.02%	5.38%	4.74%	4.10%	7.06%
12	OGE Energy Corp.	\$43,46	\$1.46	4.35%	4.31%		3.60%	3.77%	3.93%	4.10%	7.17%
13	Otter Tail Corporation	\$52.96	\$1.40	7.80%	7.18%	4.27%	4.23%	4.18%	4.14%	4.10%	7.65%
14	Pinnacle West Capital Corporation	\$94.60	\$2.95	5.51%		6.57%	5.95%	5.33%	4.72%	4.10%	7.58%
15	PNM Resources, Inc.	\$50.98	\$1.16	5.96%	5.28%	5.04%	4.81%	4.57%	4.34%	4.10%	7.65%
16	Portland General Electric Company	\$56.32	\$1.54		5.65%	5.34%	5.03%	4.72%	4.41%	4.10%	6.76%
17	Southern Company	\$50.52 \$59.98		4.51%	4.44%	4.37%	4.30%	4.24%	4.17%	4.10%	7.01%
18	WEC Energy Group, Inc.	\$92.85	\$2.48 \$2.36	3.03%	3.21%	3.39%	3.57%	3.74%	3.92%	4.10%	8.12%
19	Xcel Energy Inc.	\$63.39		6.14%	5.80%	5.46%	5.12%	4.78%	4.44%	4.10%	7.11%
,,	Accordingly inc.	Φ 03.3 9	\$1.62	5.30%	5.10%	4.90%	4.70%	4.50%	4.30%	4.10%	6.97%
20 21	Average Median	\$78.32	\$2.25	5.64%	5.38%	5.13%	4.87%	4.61%	4.36%	4.10%	7.45% 7.38%

Sources

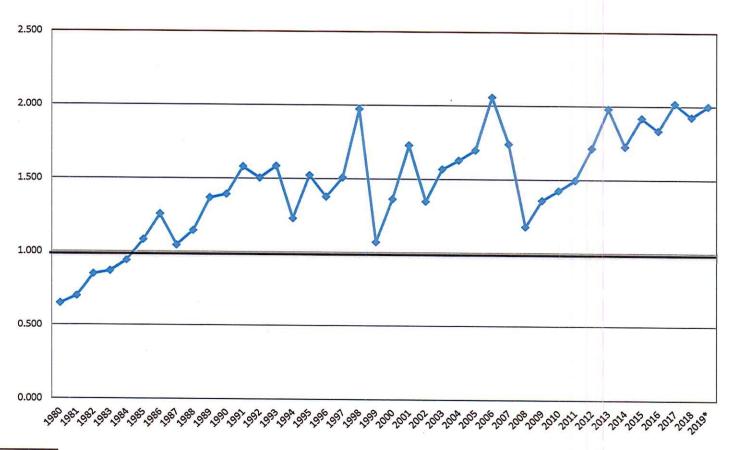
¹ S&P Global Market Intelligence, Downloaded on November 12, 2019.

² The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

³ Schedule CCW-4.

⁴ Blue Chip Economic Indicators, October 10, 2019 at 14.

Common Stock Market/Book Ratio



Source:

1980 - 2000: Mergent Public Utility Manual.

2001 - 2015: AUS Utility Reports, multiple dates.

2016 - 2018: Value Line Investment Survey, multiple dates.

^{*} Value Line Investment Survey Reports, August 16, August 30, September 13, and October 25, 2019.

Equity Risk Premium - Treasury Bond

<u>Line</u>	<u>Year</u>	Authorized Electric <u>Returns¹</u> (1)	30 yr. Treasury <u>Bond Yield²</u> (2)	Indicated Risk <u>Premium</u> (3)	Rolling 5 - Year <u>Average</u> (4)	Rolling 10 - Year <u>Average</u> (5)
1	1986	13.93%	7.80%	6.13%		
2	1987	12.99%	8.58%	4.41%	•	
3	1988	12.79%	8.96%	3.83%		
4	1989	12.97%	8.45%	4.52%		
5	1990	12.70%	8.61%	4.09%	4.60%	
6	1991	12.55%	8.14%	4.41%	4.25%	
7	1992	12.09%	7.67%	4.42%	4.26%	
8	1993	11.41%	6.60%	4.81%	4.45%	
9	1994	11.34%	7.37%	3.97%	4.34%	
10	1995	11.55%	6.88%	4.67%	4.46%	4.53%
11	1996	11.39%	6.70%	4.69%	4.51%	4.38%
12	1997	11.40%	6.61%	4.79%	4.59%	4.42%
13	1998	11.66%	5.58%	6.08%	4.84%	4.65%
14	1999	10.77%	5.87%	4.90%	5.03%	4.68%
15	2000	11.43%	5.94%	5.49%	5.19%	4.82%
16	2001	11.09%	5.49%	5.60%	5.37%	4.94%
17	2002	11.16%	5.43%	5.73%	5.56%	5.07%
18	2003	10.97%	4.96%	6.01%	5.55%	5.19%
19	2004	10.75%	5.05%	5.70%	5.71%	5.37%
20	2005	10.54%	4.65%	5.89%	5.79%	5.49%
21	2006	10.34%	4.90%	5.44%	5.76%	5.56%
22	2007	10.31%	4.83%	5.48%	5.71%	5.63%
23	2008	10.37%	4.28%	6.09%	5.72%	5.63%
24	2009	10.52%	4.07%	6.45%	5.87%	5.79%
25	2010	10.29%	4.25%	6.04%	5.90%	5.84%
26	2011	10.19%	3.91%	6.28%	6.07%	5.91%
27	2012	10.01%	2.92%	7.09%	6.39%	6.05%
28	2013	9.81%	3.45%	6.36%	6.44%	6.08%
29	2014	9.75%	3.34%	6.41%	6.44%	6.15%
30	2015	9.60%	2.84%	6.76%	6.58%	6.24%
31	2016	9.60%	2.60%	7.00%	6.72%	6.40%
32	2017	9.68%	2.90%	6.79%	6.66%	6.53%
33	2018	9.55%	3.11%	6.44%	6.68%	6.56%
34	2019 ³	9.57%	2.69%	6.88%	6.77%	6.60%
35 36 37	Average Minimum Maximum	11.03%	5.45%	5.58%	5.54% 4.25% 6.77%	5.54% 4.38% 6.60%

Sources:

³ Data includes January - September, 2019.

Regulatory Research Associates, Inc., Regulatory Focus, Major Rate Case Decisions, Jan. 1997 pg. 5, and Jan. 2011 pg. 3. S&P Global Market Intelligence, RRA Regulatory Focus, Major Rate Case Decisions, January- September 2019, October 17, 20 2006 - 2019 Authorized Returns exclude limited issue rider cases.

² St. Louis Federal Reserve: Economic Research, http://research.stlouisfed.org/.

The yields from 2002 to 2005 represent the 20-Year Treasury yields obtained from the Federal Reserve Bank

Equity Risk Premium - Utility Bond

<u>Line</u>	<u>Year</u>	Authorized Electric <u>Returns¹</u> (1)	Average "A" Rated Utility <u>Bond Yield²</u> (2)	Indicated Risk <u>Premium</u> (3)	Rolling 5 - Year <u>Average</u> (4)	Rolling 10 - Year <u>Average</u> (5)
1	1986	13.93%	9.58%	4.35%		
2	1987	12.99%	10.10%	2.89%		
3	1988	12.79%	10.49%	2.30%		
4	1989	12.97%	9.77%	3.20%		
5	1990	12.70%	9.86%	2.84%	3.12%	
6	1991	12.55%	9.36%	3.19%	2.88%	
7	1992	12.09%	8.69%	3.40%	2.99%	
8	1993	11.41%	7.59%	3.82%	3.29%	
9	1994	11.34%	8.31%	3.03%	3.26%	
10	1995	11.55%	7.89%	3.66%	3.42%	3.27%
11	1996	11.39%	7.75%	3.64%	3.51%	3.20%
12	1997	11.40%	7.60%	3.80%	3.59%	3.29%
13	1998	11.66%	7.04%	4.62%	3.75%	3.52%
14	1999	10.77%	7.62%	3.15%	3.77%	3.52%
15	2000	11.43%	8.24%	3.19%	3.68%	3.55%
16	2001	11.09%	7.76%	3.33%	3.62%	3.56%
17	2002	11.16%	7.37%	3.79%	3.61%	3.60%
18	2003	10.97%	6.58%	4.39%	3.57%	3.66%
19	2004	10.75%	6.16%	4.59%	3.86%	3.82%
20	2005	10.54%	5.65%	4.89%	4.20%	3.94%
21	2006	10.34%	6.07%	4.27%	4.39%	4.00%
22	2007	10.31%	6.07%	4.24%	4.48%	4.04%
23	2008	10.37%	6.53%	3.84%	4.37%	3.97%
24	2009	10.52%	6.04%	4.48%	4.34%	4.10%
25	2010	10.29%	5.47%	4.82%	4.33%	4.26%
26	2011	10.19%	5.04%	5.15%	4.51%	4.45%
27	2012	10.01%	4.13%	5.88%	4.83%	4.66%
28	2013	9.81%	4.48%	5.33%	5.13%	4.75%
29	2014	9.75%	4.28%	5.47%	5.33%	4.84%
30	2015	9.60%	4.12%	5.48%	5.46%	4.90%
31	2016	9.60%	3.93%	5.67%	5.57%	5.04%
32	2017	9.68%	4.00%	5.68%	5.53%	5.18%
33	2018	9.55%	4.25%	5.30%	5.52%	5.33%
34	2019 ³	9.57%	3.89%	5.68%	5.56%	5.45%
35	Average	11.03%	6.81%	4.22%	4.18%	4.15%
36	Minimum				2.88%	3.20%
37	Maximum				5.57%	5.45%

Sources:

¹ Regulatory Research Associates, Inc., Regulatory Focus, Major Rate Case Decisions, Jan. 1997 pg. 5, and Jan. 2011 pg. 3. S&P Global Market Intelligence, RRA Regulatory Focus, Major Rate Case Decisions, January- September 2019, October 17, 2006 - 2019 Authorized Returns exclude limited issue rider cases.

² Mergent Public Utility Manual, Mergent Weekly News Reports, 2003. The utility yields for the period 2001-2009 were obtained from the Mergent Bond Record.

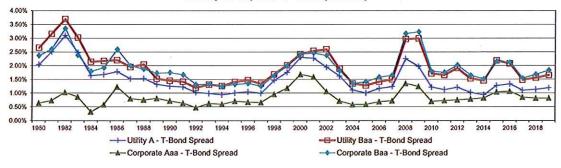
The utility yields from 2010-2019 were obtained from http://credittrends.moodys.com/.

³ Data includes January - September, 2019.

Bond Yield Spreads

				Publ	ic Utility Bond	ı .		C	orporate Bond		Utility to	Corporate
		T-Bond	-		A-T-Bond	Baa-T-Bond			Aaa-T-Bond	Baa-T-Bond	Baa	A-Aaa
Line	<u>Year</u>	Yield ¹	A ²	Baa ²	Spread	Spread	Aaa ³	Baa ³	Spread	Spread	Spread	Spread
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
1	1980	11.30%	13.34%	13.95%	2.04%	2.65%	11.94%	13.67%	0.64%	2.37%	0.28%	1.40%
2	1981	13.44%	15.95%	16.60%	2.51%	3.16%	14.17%	16.04%	0.73%	2.60%	0.56%	1.78%
3	1982	12.76%	15.86%	16.45%	3.10%	3.69%	13.79%	16.11%	1.03%	3.35%	0.34%	2.07%
4	1983	11.18%	13.66%	14.20%	2.48%	3.02%	12.04%	13.55%	0.86%	2.38%	0.65%	1.62%
5	1984	12.39%	14.03%	14.53%	1.64%	2.14%	12.71%	14.19%	0.32%	1.80%	0.34%	1.32%
6	1985	10.79%	12.47%	12.96%	1.68%	2.17%	11.37%	12.72%	0.58%	1.93%	0.24%	1.10%
7	1986	7.80%	9.58%	10.00%	1.78%	2.20%	9.02%	10.39%	1.22%	2.59%	-0.39%	0.56%
8	1987	8.58%	10.10%	10.53%	1.52%	1.95%	9.38%	10.58%	0.80%	2.00%	-0.05%	0.72%
9	1988	8.96%	10.49%	11.00%	1.53%	2.04%	9.71%	10.83%	0.75%	1.87%	0.17%	0.78%
10	1989	8.45%	9.77%	9.97%	1.32%	1.52%	9.26%	10.18%	0.81%	1.73%	-0.21%	0.51%
11	1990	8.61%	9.86%	10.06%	1.25%	1.45%	9.32%	10.36%	0.71%	1.75%	-0.30%	0.54%
12	1991	8.14%	9.36%	9.55%	1.22%	1.41%	8.77%	9.80%	0.63%	1.67%	-0.25%	0.59%
13	1992	7.67%	8.69%	8.86%	1.02%	1.19%	8.14%	8.98%	0.47%	1.31%	-0.12%	0.55%
14	1993	6.60%	7.59%	7.91%	0.99%	1.31%	7.22%	7.93%	0.62%	1.33%	-0.02%	0.37%
15	1994	7.37%	8.31%	8.63%	0.94%	1.26%	7.96%	8.62%	0.59%	1.25%	0.01%	0.35%
16	1995	6.88%	7.89%	8.29%	1.01%	1.41%	7.59%	8.20%	0.71%	1.32%	0.09%	0.30%
17	1996	6.70%	7.75%	8.17%	1.05%	1.47%	7.37%	8.05%	0.67%	1.35%	0.12%	0.38%
18	1997	6.61%	7.60%	7.95%	0.99%	1.34%	7.26%	7.86%	0.66%	1.26%	0.09%	0.34%
19	1998	5.58%	7.04%	7.26%	1.46%	1.68%	6.53%	7.22%	0.95%	1.64%	0.04%	0.51%
20	1999	5.87%	7.62%	7.88%	1.75%	2.01%	7.04%	7.87%	1.18%	2.01%	0.01%	0.58%
21	2000	5.94%	8.24%	8.36%	2.30%	2.42%	7.62%	8.36%	1.68%	2.42%	-0.01%	0.62%
22	2001	5.49%	7.76%	8.03%	2.27%	2.54%	7.08%	7.95%	1.59%	2.45%	0.08%	0.68%
23	2002	5.43%	7.37%	8.02%	1.94%	2.59%	6.49%	7.80%	1.06%	2.37%	0.22%	0.88%
24	2003	4.96%	6.58%	6.84%	1.62%	1.89%	5.67%	6.77%	0.71%	1.81%	0.08%	0.91%
25	2004	5.05%	6.16%	6.40%	1.11%	1.35%	5.63%	6.39%	0.58%	1.35%	0.00%	0.53%
26	2005	4.65%	5.65%	5.93%	1.00%	1.28%	5.24%	6.06%	0.59%	1.42%	-0.14%	0.41%
27	2006	4.90%	6.07%	6.32%	1.17%	1.42%	5.59%	6.48%	0.69%	1.58%	-0.16%	0.48%
28	2007	4.83%	6.07%	6.33%	1.24%	1.50%	5.56%	6.48%	0.72%	1.65%	-0.15%	0.52%
29	2008	4.28%	6.53%	7.25%	2.25%	2.97%	5.63%	7.45%	1.35%	3.17%	-0.20%	0.90%
30	2009	4.07%	6.04%	7.06%	1.97%	2.99%	5.31%	7.30%	1.24%	3.23%	-0.24%	0.73%
31	2010	4.25%	5.47%	5.96%	1.22%	1.71%	4.95%	6.04%	0.70%	1.79%	-0.08%	0.52%
32	2011	3.91%	5.04%	5.57%	1.13%	1.66%	4.64%	5.67%	0.73%	1.76%	-0.10%	0.40%
33	2012	2.92%	4.13%	4.83%	1.21%	1.90%	3.67%	4.94%	0.75%	2.02%	-0.11%	0.46%
34	2013	3.45%	4.48%	4.98%	1.03%	1.53%	4.24%	5.10%	0.79%	1.65%	-0.12%	0.24%
35	2014	3.34%	4.48%	4.80%	0.94%	1.46%	4.16%	4.86%	0.82%	1.52%	-0.06%	0.12%
1000			4.12%			2.19%	3.89%	5.00%	1.05%	2.16%	0.03%	0.12%
36	2015	2.84%		5.03%	1.27%							
37	2016	2.60%	3.93%	4.67%	1.33%	2.08%	3.66%	4.71%	1.07%	2.12%	-0.04%	0.27%
38	2017	2.90%	4.00%	4.38%	1.10%	1.48%	3.74%	4.44%	0.85%	1.55%	-0.06%	0.26%
39	2018	3.11%	4.25%	4.67%	1.14%	1.56%	3.93%	4.80%	0.82%	1.69%	-0.13%	0.32%
40	2019 4	2.69%	3.89%	4.35%	1.20%	1.66%	3.51%	4.53%	0.82%	1.84%	-0.18%	0.38%
41	Average	6.43%	7.93%	8.36%	1.49%	1.93%	7.27%	8.36%	0.84%	1.93%	0.01%	0.66%

Yield Spreads
Treasury Vs. Corporate & Treasury Vs. Utility



Sources:

1 St. Louis Federal Reserve: Economic Research, http://research.stlouisfed.org/.

St. Louis Federal Reserve: Economic Research, http://research.stouisfed.org/.
 The utility yields for the period 1980-2000 were obtained from Mergent Public Utility Manual, Mergent Weekly News Reports, 2003. The utility yields for the period 2001-2009 were obtained from the Mergent Bond Record.
 The utility yields for the period 2010-2019 were obtained from http://credittrends.moodys.com/.

 The corporate yields for the period 1980-2009 were obtained from the St. Louis Federal Reserve: Economic Research, http://research.stlouisfed.org/.
 The corporate yields from 2010-2019 were obtained from http://credittrends.moodys.com/.

 Data includes January - September, 2019.

Treasury and Utility Bond Yields

<u>Line</u>	<u>Date</u>	Treasury <u>Bond Yield¹</u> (1)	"A" Rated Utility <u>Bond Yield²</u> (2)	"Baa" Rated Utility <u>Bond Yield²</u> (3)
1	11/01/19	2.21%	3.36%	3.70%
2	10/25/19	2.29%	3.44%	3.77%
3	10/18/19	2.25%	3.43%	3.77%
4	10/11/19	2.22%	3.43%	3.77%
5	10/04/19	2.01%	3.26%	3.60%
6	09/27/19	2.13%	3.35%	3.68%
7	09/20/19	2.17%	3.41%	3.75%
8	09/13/19	2.37%	3.57%	3.92%
9	09/06/19	2.02%	3.24%	3.58%
10	08/30/19	1.96%	3.19%	3.53%
11	08/23/19	2.02%	3.23%	3.56%
12	08/16/19	2.01%	3.23%	3.55%
13	08/09/19	2.26%	3.38%	3.71%
14	Average	2.15%	3.35%	3.68%
15	Spread To Treasury		1.20%	1.53%

Sources:

¹ St. Louis Federal Reserve: Economic Research, http://research.stlouisfed.org.

² http://credittrends.moodys.com/.

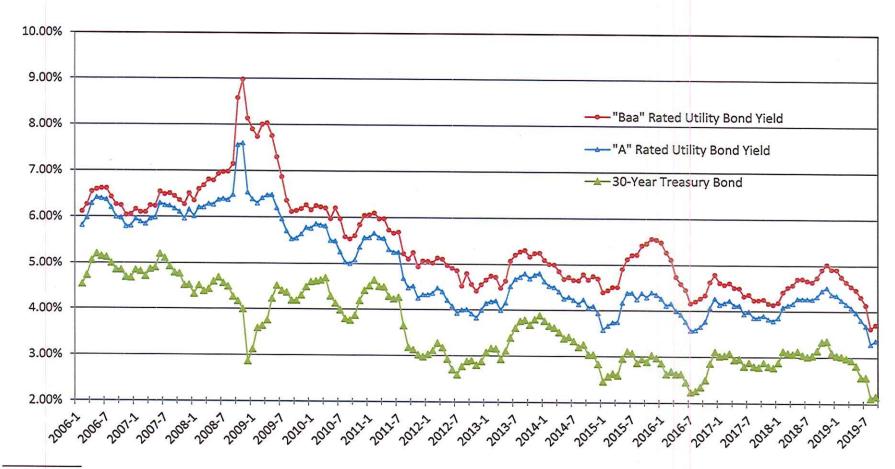
Treasury and Utility Bond Yields

<u>Line</u>	<u>Date</u>	Treasury <u>Bond Yield¹</u> (1)	"A" Rated Utility <u>Bond Yield²</u> (2)	"Baa" Rated Utility <u>Bond Yield²</u> (3)
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10	08/30/19	1.96%	3.19%	3.53%
11	08/23/19	2.02%	3.23%	3.56%
12	08/16/19	2.01%	3.23%	3.55%
13	08/09/19	2.26%	3.38%	3.71%
14	08/02/19	2.39%	3.47%	3.81%
15	07/26/19	2.59%	3.68%	4.01%
16	07/19/19	2.57%	3.69%	4.18%
17	07/12/19	2.64%	3.76%	4.24%
18	07/05/19	2.54%	3.72%	4.19%
19	06/28/19	2.52%	3.72%	4.19%
20	06/21/19	2.59%	3.80%	4.30%
21	06/14/19	2.59%	3.86%	4.36%
22	06/07/19	2.57%	3.84%	4.35%
23	05/31/19	2.58%	3.83%	4.33%
24	05/24/19	2.75%	3.95%	4.47%
25	05/17/19	2.82%	3.99%	4.48%
26	05/10/19	2.89%	4.01%	4.51%
27	Average	2.38%	3.57%	3.97%
28	Spread To Treasury		1.19%	1.59%

Sources:

¹ St. Louis Federal Reserve: Economic Research, http://research.stlouisfed.org.
² http://credittrends.moodys.com/.

Trends in Bond Yields



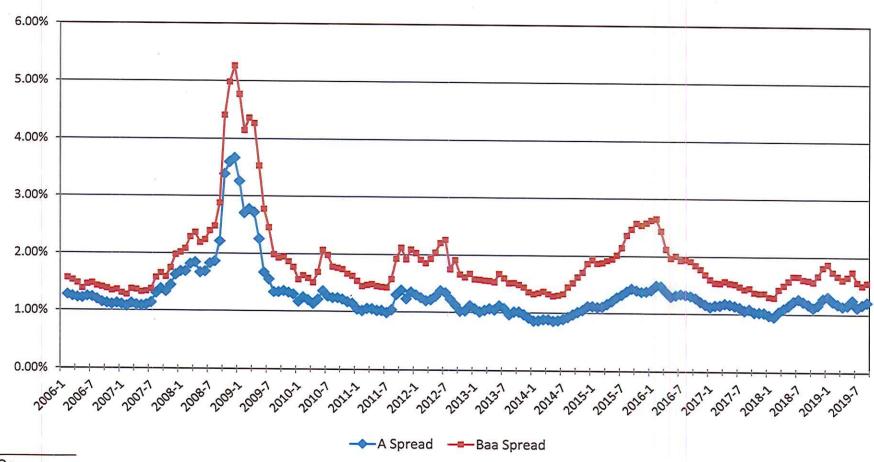
Sources:

Mergent Bond Record.

www.moodys.com, Bond Yields and Key Indicators.

St. Louis Federal Reserve: Economic Research, http://research.stlouisfed.org/

Yield Spread Between Utility Bonds and 30-Year Treasury Bonds



Sources:

Mergent Bond Record.

www.moodys.com, Bond Yields and Key Indicators.

St. Louis Federal Reserve: Economic Research, http://research.stlouisfed.org/

Value Line Beta

<u>Line</u>	Company	<u>Beta</u>
1	ALLETE, Inc.	0.65
2	Alliant Energy Corporation	0.60
3	American Electric Power Company, Inc.	0.55
4	Avangrid, Inc.	0.40
5	CMS Energy Corporation	0.55
6	DTE Energy Company	0.55
7	Duke Energy Corporation	0.50
8	Evergy, Inc.	NMF
9	Hawaiian Electric Industries, Inc.	0.55
10	NextEra Energy, Inc.	0.55
11	NorthWestern Corporation	0.60
12	OGE Energy Corp.	0.80
13	Otter Tail Corporation	0.65
14	Pinnacle West Capital Corporation	0.55
15	PNM Resources, Inc.	0.60
16	Portland General Electric Company	0.60
17	Southern Company	0.50
18	WEC Energy Group, Inc.	0.50
19	Xcel Energy Inc.	0.50
20	Average	0.57
21	Median	0.55
22	Historical Beta ²	0.68

Source:

¹ The Value Line Investment Survey, August 16, September 13, and October 25, 2019.

² Schedule CCW-16 page 2.

<u>Historical Betas</u> (Electric Utilities)

Line	Company	Average	2Q19	1Q19	4Q18	3Q18	2Q18	1Q18	4Q17	_3Q17_	2Q17	1017	4Q16	3Q16	2016	1Q16	4Q15	3Q15	2Q15	1Q15	4Q14	3Q14
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)
																` '		, .,	/	1 7	, <i>r</i>	. ,
1	ALLETE, Inc.	0.76	0.65	0.65	0.65	0.70	0.75	0.75	0.80	0.75	0.80	0.80	0.75	0.75	0.75	0.80	0.80	0.80	08.0	0.80	0.80	0.80
2	Alliant Energy Corporation	0.73	0.60	0.65	0.60	0.65	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.75	0.75	0.80	0.80	0.80	0.80	0.80	0.80	0.80
3	American Electric Power Company, Inc.	0.65	0.55	0.55	0.55	0.60	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.70	0.70	0.70	0.70	0.70	0.70	0.70	0.70
4	Avangrid, Inc.	0.36	0.40	0.40	0.30	0.30	0.40	0.35	NMF	NMF	NMF	NMF	NMF	N/A	N/A							
5	CMS Energy Corporation	0.66	0.55	0.55	0.55	0.55	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.70	0.75	0.75	0.70	0.75	0.75	0.70	0.75
6	DTE Energy Company	0.67	0.55	0.55	0.55	0.60	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.70	0.70	0.75	0.75	0.75	0.75	0.75	0.75	0.75
7	Duke Energy Corporation	0.58	0.50	0.50	0.55	0.55	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.65	0.50	0.60	0.60	0.60	0.60	0.60
8	Evergy, Inc.	N/A	NMF	NMF	NMF	NMF	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9	Hawalian Electric Industries, Inc.	0.72	0.60	0.60	0.60	0.65	0.65	0.70	0.70	0.70	0.70	0.70	0.70	0.75	0.75	0.80	08.0	0.80	0.80	0.80	0.80	0.75
	NextEra Energy, Inc.	0.67	0.60	0.60	0.60	0.60	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.70	0.70	0.75	0.70	0.75	0.70	0.70	0.70
	NorthWestern Corporation	0.68	0.60	0.55	0.60	0.65	0.65	0.70	0.70	0.65	0.65	0.70	0.70	0.70	0.70	0.70	0.70	0.75	0.70	0.70	0.70	0.70
	OGE Energy Corp.	0.91	0.80	0.85	0.85	0.90	0.95	0.95	0.95	0.95	0.95	0.95	0.90	0.90	0.95	0.95	0.95	0.90	0.90	0.90	0.90	0.85
	Otter Tail Corporation	0.85	0.70	0.70	0.75	0.80	0.85	0.85	0.90	0.90	0.90	0.85	0.85	0.85	0.80	0.85	0.85	0.85	0.90	0.90	0.90	0.95
	Pinnacle West Capital Corporation	0.68	0.55	0.55	0.60	0.65	0.65	0.70	0.70	0.65	0.70	0.70	0.70	0.70	0.75	0.75	0.75	0.70	0.70	0.70	0.70	0.70
	· · · · · · · · · · · · · · · · · · ·	0.77	0.65	0.65	0.60	0.75	0.70	0.75	0.75	0.75	0.70	0.75	0.75	0.80	0.80	0.80	0.85	0.85	0.85	0.85	0.85	0.85
17	Portland General Electric Company Southern Company	0.72	0.60	0.60	0.60	0.65	0.65	0.70	0.70	0.70	0.70	0.70	0.70	0.75	0.80	0.80	08.0	0.80	0.80	0.80	08.0	0.75
17	WEC Energy Group, Inc.	0.56	0.50	0.50	0.50	0.50	0.55	0.65	0.55	0.55	0.55	0.55	0.55	0.55	0.55	0.60	0.60	0.55	0.60	0.55	0.55	0.60
10	Xcel Energy Group, Inc.	0.62	0.50	0.55	0.50	0.55	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.65	0.65	0.70	0.70	0.70	0.70	0.65	0.65	0.65
19	Acei Energy Inc.	0.61	0.50	0.50	0.55	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.60	0.65	0.65	0.65	0.65	0.65	0.65	0.65	0.70	0.65
20	Average	0.68	0.58	0.58	0.58	0.63	0.66	83.0	0.70	0.69	0.69	0.69	0.69	0.71	0.72	0.75	0.75	0.74	0.75	0.74	0.74	0.74

Source: Value Line Software Analyzer

CAPM Return

<u>Line</u>	<u>Description</u> Current Beta	Risk Premium ² Derived <u>MRP</u> (1)	FERC 2-Step DCF ³ Derived <u>MRP</u> (2)	DCF ³ Derived <u>MRP</u> (3)
1	Risk-Free Rate ¹	2.50%	2.50%	2.50%
2	Market Risk Premium	8.50%	8.10%	10.30%
3	Beta ⁴	0.57	0.57	0.57
4	САРМ	7.32%	7.09%	8.34%
	Historical Beta			
5	Risk-Free Rate ¹	2.50%	2.50%	2.50%
6	Market Risk Premium	8.50%	8.10%	10.30%
7	Historical Beta⁴	0.68	0.68	0.68
8	CAPM	8.25%	7.98%	9.47%

Sources:

Blue Chip Financial Forecasts, November 1, 2019, at 2.
 Duff & Phelps, 2019 SBBI Yearbook at 6-18.

³ State Street Global Advisors, downloaded 11/12/2019.

⁴ Schedule CCW-16, page 1.

Development of the Market Risk Premium

<u>Line</u>	<u>Description</u>	<u>MRP</u>
	Premium Based Method:	
1	Lg. Co. Stock Real Market Return	8.80% 1
2	Projected Consumer Price Index	<u>2.00%</u> ²
3	Expected Market Return	10.98%
4	Risk-Free Rate	<u>2.50%</u> ²
5	Market Risk Premium	8.50%
FERG	C 2-Step DCF Based Method:	
6	Short-Term S&P 500 Growth	10.70% ³
7	Long-Term GDP Growth	<u>4.10%</u> ⁴
8	Blended Growth Rate	8.50% ⁵
9	Index Dividend Yield	1.91% ³
10	Adjusted Yield	<u>2.07%</u>
11	Expected Market Return	10.57%
12	Risk-Free Rate	<u>2.50%</u> ²
13	Market Risk Premium	8.10%
DCF	Based Method:	
14	S&P 500 Growth	10.70% ³
15	Index Dividend Yield	1.91% ³
16	Adjusted Yield	<u>2.11%</u>
17	Expected Market Return	12.81%
18	Risk-Free Rate	2.50% ²
19	Market Risk Premium	10.30%

Sources & Note:

- ¹ Duff & Phelps 2019 SBBI Yearbook at 6-18.
- ² Blue Chip Financial Forecasts, November 1, 2019.
- ³ State Street Global Advisors, downloaded 11/12/2019.
- ⁴ Blue Chip Economic Indicators, October 10, 2019 at 14.
- ⁵ (2/3*10.70%) + (1/3*4.10%) = 8.50%.