Exhibit No.:

Issues: Issues: Return or Witness: Pauline MExhibit Type: Rebuttal

Return on Equity Pauline M. Ahern

Sponsoring Party: Missouri-American Water Company

Case No.: WR-2008-0311 Date: September 30, 2 September 30, 2008

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. WR-2008-0311

REBUTTAL TESTIMONY

OF

PAULINE M. AHERN, CRRA

ON BEHALF OF

MISSOURI AMERICAN WATER COMPANY

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

IN THE MATTER OF MISSOURI-AMERICAN WATER COMPANY FOR AUTHORITY TO FILE TARIFFS REFLECTING INCREASED RATES FOR WATER AND SEWER **SERVICE**

CASE NO. WR-2008-0311 **CASE NO. SR-2008-0312**

<u>AFFIDAVIT OF PAULINE M. AHERN</u>

Pauline M. Ahern, being first duly sworn, deposes and says that she is the witness who sponsors the accompanying testimony entitled "Rebuttal Testimony of Pauline M. Ahern"; that said testimony and schedules were prepared by her and/or under her direction and supervision; that if inquires were made as to the facts in said testimony and schedules, she would respond as therein set forth; and that the aforesaid testimony and schedules are true and correct to the best of her knowledge.

Pauline M. Ahern

State of New Jersey **County of Burlington**

SUBSCRIBED and sworn to Before me this 34 day of Sytember 2008.

My commission expires:

SHARON M. KEEFE **NOTARY PUBLIC OF NEW JERSEY** MY COMMISSION EXPIRES JULY 9, 2011

1 I. INTRODUCTION 2 Q. Please state your name, occupation and business address. 3 Α. My name is Pauline M. Ahern and I am a Principal of AUS Consultants. My 4 business address is 155 Gaither Drive, Suite A, Mt. Laurel, New Jersey 08054. 5 Q. Are you the same Pauline M. Ahern who previously submitted prepared direct 6 testimony in this proceeding? 7 Α. Yes, I am. 8 Q. Have you prepared schedules which support your rebuttal testimony? 9 Yes, I have. They have been marked for identification as Schedules PMA-14 Α. 10 through PMA- 23. 11 II. PURPOSE 12 Q. What is the purpose of this testimony? 13 Α. The purpose of this testimony is to rebut certain aspects of the direct testimony 14 of Matthew J. Barnes, witness for the Missouri Public Service Commission Staff (Staff) and Brian A. Janous, witness for the Missouri Industrial Energy 15 16 Consumers (MIEC) concerning common equity cost rate. Specifically, I will 17 address Mr. Barnes' application of the Discounted Cash Flow (DCF) Model, 18 Capital Asset Pricing Model (CAPM), and the inadequacy of his recommended 19 overall rate of return, including common equity cost rate. I will also address Mr. 20 Janous' applications of the DCF, Risk Premium Model (RPM) and CAPM. 21 III. SUMMARY

- 22 Q. Please briefly summarize your rebuttal testimony.
- A. My rebuttal testimony describes the error of Mr. Barnes' recommendation of a

range of common equity cost rate well below any reasonable range for MAWC because:

- Mr. Barnes erroneously relies solely upon the DCF to arrive at his recommended common equity cost rate despite the Commission's consideration of the results of other cost of common equity models and the results of recently awarded ROEs to utilities by various regulatory commissions around the country as noted in Case No. GR-2006-0422. He uses, albeit incorrectly, the CAPM model but only as a check on his flawed and understated recommendation. The Efficient Market Hypothesis (EMH), upon which all the cost of common equity models are premised, confirms that investors rely upon multiple cost of common equity models in formulating their required rates of return.
- Mr. Barnes' test of reasonableness, i.e., his CAPM analysis, is flawed, as are the lower required equity risk premia.
- My rebuttal testimony will also demonstrate that Mr. Janous' recommended return rate on common equity of 10.03% for MAWC is inadequate given the allowed ROEs authorized by other regulatory commissions around the country in litigated cases which average about 10.5% relative to an average common equity ratio of 49.5%. I also show that properly applied RPM and CAPM analyses yield results of approximately 11.96%/11.80% (RPM) and 11.90%/11.40% (CAPM), respectively, for his two proxy groups. Neither result corroborates his recommended cost rate of common equity of 10.03% for MAWC.

IV. COMMON EQUITY COST RATE

A. Testimony of MoPSC Staff Witness Matthew J. Barnes

1. Discounted Cash Flow Model

- Q. Mr. Barnes' range of recommended common equity cost rate, 9.60% 10.60%, with a midpoint of 10.10% is based exclusively upon a Discounted Cash Flow (DCF) analysis, notwithstanding his use of the CAPM as a check. Please comment.
- A. The DCF model utilized by Mr. Barnes is market-based since recent as well as current market prices are employed in its application. Therefore, it is based upon the EMH which is the foundation of modern investment theory, first pioneered by Eugene F. Fama¹ in 1970. As discussed in my direct testimony, pages 20 through 22, an efficient market is one in which security prices reflect all relevant information all the time. This implies that prices adjust instantaneously to new information, thus reflecting the intrinsic fundamental economic value of a security.²

The semistrong form of the EMH, which asserts that all publicly available information is fully reflected in securities prices, i.e., fundamental analysis cannot "outperform the market", is generally held to be true because the use of insider information often enables investors to "outperform the market" and earn excessive returns. This means that all perceived risks are taken into account

Fama, Eugene F., "Efficient Capital Markets: A Review of Theory and Empirical Work". <u>Journal of Finance</u>, May 1970, pp. 383-417.

Eugene F. Brigham, <u>Fundamentals of Financial Management</u>, 5th Edition, The Dryden Press, 1989, p. 225.

by investors in the prices they pay for securities. Investors are thus aware of all publicly-available information, including bond ratings; discussions about companies by bond rating agencies and investment analysts; as well as the various cost of common equity methodologies (models) discussed in the financial literature. Hence, no single common equity cost rate model should be relied upon in determining a cost rate of common equity and that the results of multiple cost of common equity models should be taken into account.

- Q. Your direct testimony provides academic support for the need to rely upon more than one cost of common equity model in arriving at a recommended common equity cost rate. Would you please revisit the concept?
- A. Yes. For example, Phillips³ states:

Since regulation establishes a level of authorized earnings which, in turn, implicitly influences dividends per share, estimation of the growth rate from such data is an inherently circular process. For these reasons, the DCF model "suggests a degree of precision which is in fact not present" and leaves "wide room for controversy and argument about the level of k". (italics added) (p. 396)

* * *

Despite the difficulty of measuring relative risk, the comparable earnings standard is no harder to apply than is the market-determined standard. The DCF method, to illustrate, requires a subjective determination of the growth rate the market is contemplating. Moreover, as Leventhal has argued: 'Unless the utility is permitted to earn a return comparable to that available elsewhere on similar risk, it will not be able in the long run to attract capital.' (italics added) (p. 398)

Charles F. Phillips, Jr., <u>The Regulation of Public Utilities-Theory and Practice</u>, 1993, Public Utility Reports, Inc., Arlington, VA, p. 396, 398.

Also, Morin⁴ states:

Each methodology requires the exercise of considerable judgment on the reasonableness of the assumptions underlying the methodology and on the reasonableness of the proxies used to validate a theory. The inability of the DCF model to account for changes in relative market valuation, discussed below, is a vivid example of the potential shortcomings of the DCF model when applied to a given company. Similarly, the inability of the CAPM to account for variables that affect security returns other than beta tarnishes its use. (italics added)

No one individual method provides the necessary level of precision for determining a fair return, but each method provides useful evidence to facilitate the exercise of an informed judgment. Reliance on any single method or preset formula is inappropriate when dealing with investor expectations because of possible measurement difficulties and vagaries in individual companies' market data. (Morin, p. 428)

* * *

The financial literature supports the use of multiple methods. Professor Eugene Brigham, a widely respected scholar and finance academician, asserts: (footnote omitted)

Three methods typically are used: (1) the Capital Asset Pricing Model (CAPM), (2) the discounted cash flow (DCF) method, and (3) the bond-yield-plus-risk-premium approach. These methods are not mutually exclusive — no method dominates the others, and all are subject to error when used in practice. Therefore, when faced with the task of estimating a company's cost of equity, we generally use all three methods and then choose among them on the basis of our confidence in the data used for each in the specific case at hand.

Another prominent finance scholar, Professor Stewart Myers, in an early pioneering article on regulatory finance, stated:^{2(footnote omitted)}

Use more than one model when you can. Because estimating

Roger A. Morin, New Regulatory Finance, 2006, Public Utilities Reports, Inc., Arlington, VA, pp. 428-431.

the opportunity cost of capital is difficult, only a fool throws away useful information. That means you should not use any one model or measure mechanically and exclusively. Beta is helpful as one tool in a kit, to be used in parallel with DCF models or other techniques for interpreting capital market data.

Reliance on multiple tests recognizes that no single methodology produces a precise definitive estimate of the cost of equity. As stated in Bonbright, Danielsen, and Kamerschen (1988), 'no single or group test or technique is conclusive.' Only a fool discards relevant evidence. (italics in original) (Morin, p. 430)

* * *

While it is certainly appropriate to use the DCF methodology to estimate the cost of equity, there is no proof that the DCF produces a more accurate estimate of the cost of equity than other methodologies. Sole reliance on the DCF model ignores the capital market evidence and financial theory formalized in the CAPM and other risk premium methods. The DCF model is one of many tools to be employed in conjunction with other methods to estimate the cost of equity. It is not a superior methodology that supplants other financial theory and market evidence. The broad usage of the DCF methodology in regulatory proceedings in contrast to its virtual disappearance in academic textbooks does not make it superior to other methods. The same is true of the Risk Premium and CAPM methodologies. (italics added) (Morin, p. 431)

In view of the foregoing, it is clear that investors are aware of all of the models available for use in determining common equity cost rate. The EMH requires the assumption that, collectively, investors use them all. Therefore, Mr. Barnes' exclusive reliance upon the DCF model, notwithstanding his use of the CAPM as a check, is at odds with the very foundation, i.e., the EMH, upon which the DCF is predicated.

2. Capital Asset Pricing Model

- Q. Do you have any comment regarding Mr. Barnes' application of the CAPM?
- A. Yes. Mr. Barnes' application is flawed in three respects; 1) his use of an

historical market equity risk premium which is incorrectly derived; 2) his choice of the historical yield on 30-year U.S. Treasury bond as the risk-free rate; and 3) his failure to also apply the empirical CAPM to account for the fact that Security Market Line (SML) as described by the traditional CAPM is not as steeply sloped as the predicted SML.

- Q. You have stated that Mr. Barnes erred in exclusively relying upon an historical market equity risk premium which was incorrectly derived. Please explain.
- A. Mr. Barnes' market equity risk premium of 6.5% is derived by <u>lbbotson SBBI</u> 2008 Valuation Yearbook Market Results for Stocks, Bonds, Bills and <u>Inflation 1926-2007</u> (SBBI) as the difference between the arithmetic mean 1926-2007 total return on large company stocks of 12.3% and the arithmetic mean 1926-2007 total return on long-term government bonds of 5.8%. (6.5% = 12.3% 5.8%).⁵ The correct derivation of the historical market equity risk premium is the difference between the total return on large company stocks of 12.3% and the arithmetic mean 1926-2007 <u>income</u> return on long-term government bonds of 5.2% which results in a market equity risk premium of 7.1% (7.1% = 12.3% 5.2%). Regarding the use of the income return and not the total return for Treasury securities in deriving an equity risk premium, <u>SBBI</u> states⁶:

Another point to keep in mind when calculating the equity risk premium is that the income return on the appropriate-horizon Treasury security, rather than the total return, is used in the calculation. The total return is comprised of three return components: the income return, the capital appreciation return.

6 <u>Id</u>., at pp. 75-76.

Ibbotson SBBI – 2008 Valuation Yearbook – Market Results for Stocks, Bonds, Bills and Inflation – 1926-2007, Morningstar, Inc., Chicago, 2008, p. 28.

and the reinvestment return. The income return is defined as the portion of the total return that results from a periodic cash flow or, in this case, the bond coupon payment. The capital appreciation return results from the price change of a bond over a specific period. Bond prices generally change in reaction to unexpected fluctuations in yields. Reinvestment return is the return on a given month's investment income when reinvested into the same asset class in the subsequent months of the year. The income return is thus used in the estimation of the equity risk premium because it represents the truly riskless portion of the return. (emphasis added)

Hence, the correct historical market equity risk premium to use is 7.1% and not 6.5%. Page 1 of Schedule PMA-14 corrects Mr. Barnes' CAPM analysis to reflect a properly calculated historical market equity risk premium of 7.1%, resulting in a CAPM derived common equity cost rate of 11.88%, in contrast to his improperly derived arithmetic CAPM result of 11.27%.

In addition, Mr. Barnes relied exclusively upon an historical market equity risk premium which is in direct contrast to his use of both historical and projected growth rates in his application of the DCF model. As stated previously, the cost of capital is prospective and while the arithmetic mean of long-term historical stock market returns can provide insight into investors' expectations of stock market returns because the arithmetic mean of historical returns provides investors with the valuable insight needed to estimate future risk, it is also appropriate to use an estimate of the forecasted or projected stock market return. One indication of the forecasted stock market return can be derived using Value Line Investment Survey's (Value Line) 3-5 year median total market price appreciation projections and dividend yield projections as explained in detail on pages 52 and 53 of my direct testimony and summarized

in note 1 on page 3 of Schedule PMA-23. Based upon <u>Value Line</u> a forecasted total market return of 18.15% is indicated. However, as also discussed in my direct testimony, at lines 3 through 7 on page 46, the then current and recent decline in the stock market was extraordinary and not representative of the expected long-term. Therefore, I relied exclusively upon the historical long-term arithmetic mean equity risk premium. Since the stock market has remained and continues to be extremely volatile, it continues to be unrepresentative of the expected long-term. Hence, it remains appropriate to rely exclusively upon the long-term arithmetic market equity risk premium.

- Q. Please comment upon Mr. Barnes' use of the historical yield on 30-year U.S.
 Treasury bonds as the risk-free rate.
- A. Both the cost of capital and ratemaking are prospective. Therefore, it is inappropriate to use an historical yield as the risk-free rate in a CAPM analysis. Rather, the <u>prospective</u> yield on the 30-year U.S. Treasury bonds should be used. As shown in note 1 on page 2 of Schedule PMA-14, the current forecasted consensus yield on long-term U.S. Treasury bonds by the nearly 50 economists reported in Blue Chip Financial Forecasts dated September 1, 2008 is 4.78% for the six quarters ending with the fourth quarter 2009. Clearly, Mr. Barnes' recommended 4.69% historical yield (June 2008) on 30-year U.S. Treasury bonds understates the prospective yield.

In the top half of page 2 of Schedule PMA-14, I have derived the traditional CAPM, the one applied by Mr. Barnes, using the correct forecasted risk-free rate of 4.78% and a market equity risk premium based upon the

arithmetic mean historical market equity risk premium correctly calculated as described above. This results in a CAPM derived common equity cost rate of 11.97%, which is 70 basis points (0.70%) higher than Mr. Barnes' derived arithmetic CAPM cost rate of 11.27%, based upon an historical risk-free rate and an incorrectly derived arithmetic mean equity risk premium for the years 1926-2007. A CAPM cost rate of 11.97% or even Mr. Barnes' 11.27% corroborates neither Mr. Barnes' range of DCF results of 9.22% to 10.22% or his recommended range of common equity cost rate of 9.60% to 10.60%.

- Q. You have stated that Mr. Barnes also failed to apply the empirical CAPM to account for the fact that Security Market Line (SML) as described by the traditional CAPM is not as steeply sloped as the predicted SML. Please comment.
- A. As discussed in my direct testimony at lines 13 through 36 on page 49 of my direct testimony, while numerous tests of the CAPM have confirmed its validity, these tests have determined that "the implied intercept term exceeds the risk-free rate and the slope term is less than predicted by the CAPM." These tests have also indicated that the expected return on a security is related to its risk by the following formula:

$$K = R_F + 0.25(R_M - R_F) + 0.75\beta(R_M - R_F)$$

Applying this formula using the corrected risk-free rate and market equity risk premium described previously, yields an empirical CAPM derived common equity cost rate of 11.95% for Mr. Barnes' comparable water companies as

Roger A. Morin, New Regulatory Finance, 2006, Public Utilities Reports, Inc., Arlington, VA, p. 175.

shown in the bottom half of page 2 of Schedule PMA-14. Averaging this 11.95% empirical CAPM result with the corrected traditional CAPM result of 11.97% results in an average CAPM result of 11.96%, which also does not corroborate either Mr. Barnes' range of DCF results of 9.22% to 10.22% or his range of recommended common equity cost rate of 9.60% to 10.60%.

- Q. Please discuss Mr. Barnes' use of geometric average market risk premium for the years 1926-2006 and 1996-2007
- A. In addition to calculating a CAPM derived common equity cost rate based upon the historical arithmetic mean equity risk premium, albeit, incorrectly derived, Mr. Barnes also calculated a CAPM derived common equity cost rate using the long-term historical geometric mean equity risk premium.

As discussed in my direct testimony at page 43, line 22 through page 45, line 13, it is the arithmetic mean return and not the geometric mean return which is appropriate for cost of capital purposes. Because historical total returns and equity risk premia differ in size and direction over time, the arithmetic mean provides insight into the variance and standard deviation of returns, i.e., risk. Thus the prospect for variance, i.e., standard deviation, captured in the arithmetic mean, provides the valuable insight needed by investors and rate of return analysts alike to estimate the expected risk of stocks. Without such insight, investors cannot meaningfully evaluate prospective risk. Because the geometric mean relates the change over many periods to a constant rate of change, the variance, i.e., year-to-year fluctuations, and hence, risk, which is critical to rate of return analysis, is not

reflected in geometric mean returns / premia.

The financial literature is quite clear on this point, that risk is measured by the variability of expected returns, i.e., the probability distribution of returns.⁸ Pages 77 through 83 of <u>SBBI</u> (see Schedule PMA-15) explain in detail why the arithmetic mean is the correct mean to use when estimating the cost of capital.

In addition, Weston and Brigham⁹ provide the standard financial textbook definition of the riskiness of an asset when they state:

The riskiness of an asset is defined in terms of the <u>likely</u> variability of future returns from the asset. (emphasis added)

And Morin states¹⁰:

The geometric mean answers the question of what constant return you would have to achieve in each year to have your investment growth match the return achieved by the stock market. The arithmetic mean answers the question of what growth rate is the best estimate of the <u>future</u> amount of money that will be produced by continually reinvesting in the stock market. It is the rate of return which, compounded over multiple periods, gives the mean of the probability distribution of ending wealth. (emphasis added)

In addition, Brealey and Myers¹¹ note:

The proper uses of arithmetic and compound rates of return from past investments are often misunderstood. . . Thus the arithmetic average of the returns correctly measures the opportunity cost of capital for investments. . . *Moral*: If the cost of capital is estimated from historical returns or risk premiums, use arithmetic averages, not compound annual rates of return. (italics in original)

Eugene F. Brigham, <u>Fundamentals of Financial Management</u>, 5th Ed., The Dryden Press, 1989, p. 639.

J. Fred Weston and Eugene F. Brigham, <u>Essentials of Managerial Finance</u>, 3rd Ed., The Dryden Press, 1974, p. 272.

ld., at p. 133.

Brealey, R.A. and Myers, S.C., <u>Principles of Corporate Finance</u>, 5th Ed., McGraw-Hill Publications, Inc., 1996, pp. 146-147.

As previously discussed, investors gain insight into relative riskiness by analyzing expected future variability. This is accomplished by the use of the arithmetic mean of a distribution of returns / premia. Only the arithmetic mean takes into account <u>all</u> of the returns / premia, hence, providing meaningful insight into the variance and standard deviation of those returns / premia.

- Q. Can it be demonstrated that the arithmetic mean takes into account all of the returns and therefore, that the arithmetic mean is appropriate to use when estimating the opportunity cost of capital in contrast to the geometric mean?
- Q. Yes. Schedule PMA-16, which consists of three pages, graphically demonstrates this premise. Page 1 charts the returns on large company stocks for each and every year, 1926 through 2007 from <u>SBBI</u>. It is clear from looking at the variation of these returns that stock market returns, and hence, equity risk premia, vary.

Shown on page 2 is the distribution of each and every one of those returns for the entire period from 1926 through 2007. There is a clear bell-shaped pattern to the probability distribution of returns, an indication that they are randomly generated. The arithmetic mean of this distribution of returns considers all of the returns in the distribution. In doing so, the arithmetic mean takes into account the standard deviation or likely variance which may be experienced in the future when estimating the rate of return based upon such historical returns. In contrast, page 3 of Schedule PMA-16 demonstrates that when the geometric mean is calculated, only two of the returns are considered,

namely the initial and terminal years, which, in this case, are 1926 and 2007. Based upon only those two years, a constant rate of return is calculated by the geometric average. That constant return, graphically, represents a flat line over the entire 1926 to 2007 time period which is obviously far different from reality, based upon the probability distribution of returns shown on page 2 and demonstrated on page 1.

In view of all the foregoing, it should be clear that only the arithmetic mean takes the standard deviation of returns which is critical to risk analysis into account. The geometric mean is appropriate only when measuring historical performance and should not be used to estimate the investors required rate of return.

B. Recommended Common Equity Cost Rate

- Q. Please discuss Mr. Barnes' recommended common equity cost rate range of 9.60% 10.60%, with a midpoint of 10.10%.
- A. Mr. Barnes' recommended common equity cost rate range of 9.60% 10.60% is inadequate for two reasons; 1) such a cost rate range provides an insufficient achieved return on the book common equity of MAWC; and 2) such a cost rate is not consistent with the recently authorized ROEs throughout the country for other utilities.
- Q. How does Mr. Barnes' recommended range of common equity cost rate of 9.60% - 10.60% with a midpoint of 10.10% compare with the expected ROEs of his four comparable water utility companies.
- A. It is far below the level of earnings expected by Value Line for the three

companies in his group of four comparable water utility companies for which they publish a projected ROE for the years 2011-2013. The latest <u>Value Line Ratings & Reports</u> (Standard Edition) for American States Water Company, Aqua America, Inc. and California Water Service Group, (there is no projection for Middlesex Water Company) indicate that <u>Value Line</u> expects them to earn 13.5%, 12.0% and 11.0% on year-end book common equity (see Schedule PMA-17) over the next 3-5 years averaging 12.17%. While these forecasts are for earnings on book common equity, it must be remembered that the return on common equity authorized in this proceeding will be applied to the book value of the common equity financed portion of MAWC's and will therefore become MAWC's opportunity for earnings on book value. An opportunity to earn a range of return on book common equity of either Mr. Barnes' recommended range of 9.60% - 10.60% is woefully inadequate in comparison with these expected returns on book common equity of comparable water companies.

Such a common equity cost rate range is also inconsistent with the comparability of returns standard enunciated in the <u>Hope</u> decision which states:

The return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks.

Therefore, Mr. Barnes' recommended common equity cost rate range should be rejected by the MoPSC in setting rates for MAWC in this proceeding.

Q. How does Mr. Barnes' recommended range of common equity cost rate compare with recently authorized ROEs by other regulatory jurisdictions

throughout the country.

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Schedule PMA-18 is a summary of regulatory awards made to electric and gas distribution companies during the period January 1, 2008 through June 30. 2008 derived from Regulatory Research Associates (an SNL Energy Although Regulatory Research Associates does not report Company). authorized ROEs for water companies, the authorized ROEs for electric and gas distribution companies are relevant to the instant proceeding as MAWC. indeed, all water utilities, compete in the same marketplace for capital as do electric and gas distribution utilities. As shown, the average authorized ROE was 10.50% relative to an average common equity ratio of 49.53% in litigated cases. An average awarded ROE of 10.50% is near the top of Mr. Barnes' range of common equity cost rate of 9.60% - 10.60%. Also, as shown, the average awarded ROE of 10.50% represented an average equity risk premium of 4.40% over the yield on Moody's A rated utility bonds in the months prior to the awards. The average yield on A rated utility bonds for those litigated cases was 6.10%. The projected yield on A rated utility bonds is 6.59%, as derived on page 1 of Schedule PMA-22. The 6.59% yield plus an equity risk premium of 4.40% equals an ROE of 10.99% which verifies that Mr. Barnes' recommended common equity cost rate range understates the common equity cost rate applicable to MAWC.

VI. RESPONSE TO DIRECT TESTIMONY OF MIEC WITNESS BRIAN A. JANOUS

Q. At line 4 on page 4 through line 13 on page 5 of his direct testimony, Mr.

Janous discusses his belief that the MoPSC should primarily rely upon

"observable and verifiable actual current market costs", because "[t]he accuracy of projected changes to interest rates is highly problematic." (lines 5-7, page 4). Please comment.

A. As with Mr. Barnes' rejection of a projected risk-free rate, Mr. Janous comments regarding the accuracy of projected interest rates are misleading. As stated previously, both ratemaking and the cost of capital are prospective. Events that affect the future impact market activity and volatility. Therefore, investors are interested in the future, including analysts' expectations and the MoPSC should rely upon forecasted interest rates in a CAPM analysis.

For example, typically one prepares for forecasted severe weather, i.e., snowstorms, and / or hurricanes, regardless of the historical accuracy of weather forecasting. When severe weather is forecasted, those expected to be affected generally begin preparing by laying in supplies of food, batteries, candles, etc. If the severe weather does not materialize, apparently that does not stop them from making the same preparations the next time severe weather is predicted.

Under the Efficient Market Hypothesis (EMH) as discussed in my direct testimony at page 20, line 5 through page 22, line 10, investors are aware of the accuracy of analysts' forecasts and reflect their awareness in the market prices they are willing to pay.

Q. At line 3 on page 12 through line 1, page 13 of his direct testimony, Mr. Janous expresses his concerns with the comparable water group's 9.7% average projected five-year growth rate in EPS. Please comment.

A. Mr. Janous' statements are contradicted by his earlier testimony at page 10, line 20 through page 11, line 5 where he states the following:

 The growth rate used for the DCF model should be based upon the likely growth estimate that is built into stock prices. Although an individual investor may use a number of methods to estimate the expected growth in dividends, one must determine the consensus of investor expectations with respect to growth rates. Security analyst growth estimates have been shown to be more accurate predictors of future growth than historical growth rates. Assuming that markets are generally rational, one can reasonably assume that investors are using security analyst estimates in determining how to correctly value a stock. In other words, security analyst growth estimates are the most likely growth estimates that are built into stock prices.

There is a wealth of empirical and academic literature which support the superiority of analysts' forecasts of EPS as measures of investor expectations. For example, Cragg and Malkiel¹² state"

Efficient market hypotheses suggest that valuation should reflect the information available to investors. Insofar as analysts' forecasts are more precise than other types we should therefore expect their differences from other measures to be reflected in the market. It is therefore noteworthy that our regression results do support the hypothesis that analysts' forecasts are needed even when calculated growth rates are available. As we noted when we described the data, security analysts do not use simple mechanical methods to obtain their evaluations of companies. The growth-rate figures we obtained were distilled from careful examination of all aspects of the companies' records, evaluation of contingencies to which they might be subject, and whatever information about their prospects the analysts could glean from the companies themselves of from other sources. It is therefore notable that the results of their efforts are found to be so much more relevant to the valuation than the various simpler and more "objective" alternatives that we tried.

Expectations and the Structure of Share Prices, John G. Cragg and Burton G. Malkiel, The University of Chicago Press, 1982, Chapter 4.

In addition, Vander Weide and Carleton¹³ note:

. . . our studies affirm the superiority of analyst's forecasts over simple historical growth extrapolations in the stock price formation process. Indirectly, this finding lends support to the use of valuation models whose input includes expected growth rates.

Finally, it should be noted that Myron Gordon, who first introduced the standard DCF model adopted for utility ratemaking, which both Mr. Janous and I use, came to recognize that his original "Gordon Model" had a serious limitation. In a presentation on March 27, 1990, before the Institute for Quantitative Research In Finance held in Palm Beach, Florida, entitled, "The Pricing of Common Stocks", Dr. Gordon stated:

The most serious limitation of the Gordon Model is the assumption that the dividend expectation can be represented with just two parameters, D and br ... We have seen that earnings and growth estimates by security analysts were found by Malkiel and Cragg to be superior to data obtained from financial statements for the explanation of variation in price among common stocks. That is, better estimates are obtained for the coefficient of the various explanatory variables. ...estimates by security analysts available from sources such as IBES are far superior to the data available to Malkiel and Cragg. Secondly, the estimates by security analysts must be superior to the estimates derived solely from financial statements. (italics added)

In all of these studies, the referenced analyst's growth forecasts were forecasts of growth in EPS. As the recent dramatic rise of the stock market has shown, EPS is a prime, but not the sole, driver of market price movements Therefore, analyst's forecasts of EPS growth are extremely relevant to investors in making their investments decisions. It is the goal of rate of return

[&]quot;Investor Growth expectations: Analysts vs. History", James H. Vander Weide and Willard T. Carleton, <u>The Journal of Portfolio Management</u>, Spring 1988, pp. 78-82.

analysts, such as Mr. Janous and myself, to emulate investor behavior. Therefore, consistent with the EMH, the foundation of modern investment theory, the market prices of securities reflect all relevant information at all times. This implies that prices adjust instantaneously to new information, such as analysts' forecasts of EPS growth.

In view of the foregoing, the use of analysts' forecasts of EPS growth should be used to estimate today's market cost of capital. At lines 16-21 on page 5 of his direct testimony, Mr. Janous states:

The ratemaking process in itself provides utility protection against increased cost of capital. Indeed, If Missouri-American's [sic] utility subsidiaries' rates of return are set based on today's market cost of capital, and capital costs increase in the future, then the utilities are free to file for a rate change to reflect those higher capital costs. Hence, the regulatory mechanism itself provides utilities a hedge against increasing capital costs.

Mr. Janous' statements are equally true should capital costs decrease in the future. Should the market cost of capital change because analysts' forecasts of EPS growth change, parties to the regulatory process can petition for a change in a regulated utility's rates based upon changing capital costs. Hence, the regulatory process itself provides a hedge against both increasing and decreasing capital costs. Thus, there is no need to reject the empirical evidence of the proven reliability of analysts' forecasts of EPS by turning to a two- and three-stage DCF model which will be discussed subsequently.

Q. Why do you disagree with Mr. Janous' rejection of constant growth DCF cost rates of 12.96% and 10.51% for his water and gas distribution proxy groups, respectively?

- A. Mr. Barnes rejects the constant growth DCF result based upon his belief that the three- to five-year growth rate represented by analysts' forecasts is not sustainable and that the projected growth in GDP represents the maximum sustainable growth rate as discussed on page 12, line 3-19 of his direct testimony. Those reasons, however, are not persuasive. Therefore, there is no basis for rejecting the constant growth DCF cost rates of 12.96% and 10.51%.
 - Q. Why are the three- to five-year growth rate projections made by analysts in earnings per share sustainable over the longer term?
 - A. Mr. Janous states on page 14, lines 5-8 of his direct testimony that

[r]eplacement of infrastructure and the improvements to water treatment plants to meet more stringent environmental requirements results in strong growth to utilities' rate base, and growth in earnings. This growth in earnings will be realized over the next five years or so, but will eventually return to more sustainable long-term levels. It is simply not reasonable to expect that the earnings projections over the next three to five years will be sustainable indefinitely."

This assertion is simply not true. While growth in earnings may be tied to growth in authorized rate base, it is not true, as Mr. Janous implies, that current level of growth in water utility rate base will subside within the next five years or so.

As discussed in my direct testimony at page 7, line 1 through page 11, line 15, the water utility industry faces significant and continuing risks related to replacing aging infrastructure, i.e., rate base. <u>Value Line</u>¹⁴ observes the following about the water utility industry:

The cost of maintaining current water systems in the United States

¹⁴ Value Line Investment Survey, July 25, 2008.

are growing at exorbitant rates. Many of them are more than 100 years in age and in need of refurbishing, and in some cases, complete overhauls. Meanwhile, EPA requirements are becoming more stringent, a trend that will likely only intensify as the threat of bioterrorism continues to mount. In all, infrastructure costs are expected to climb into the hundreds of millions of dollars in the coming decade. However, not everyone in this space can foot the bill. Many of the smaller operators are light on cash and covered in debt.

We recommend that investors contemplating entry into the Water Utilities Industry, perhaps reconsider. None of the stocks here stand out for the coming six to twelve months or the 3- to 5-year time frame either. Rising infrastructure costs, coupled with the financial constraints that most water companies are facing, are expected to wipe out most of the benefits of a better regulatory climate, thus limiting shareholder gains. Meanwhile, the current dividend yields do not exactly whet our appetite either, with many better income bearing instruments on the market for investors to consider.

Water utility investment in infrastructure, both for replacement of aging infrastructure and new additions to infrastructure due to growth, are not expected to decline in the near future, i.e., five years, as expected by Mr. Janous. S&P states¹⁵:

Standard & Poor's expects the already capital-intensive water utility industry to become even more so over the next several years. Due to the aging pipeline infrastructure and more stringent quality standards, the U.S. Environmental Protection Agency's (EPA) foresees a need for \$277 billion to upgrade and maintain U.S. water utilities through 2022, with about \$185 billion going toward infrastructure improvements. In addition, about \$200 billion will be needed for wastewater applications, which suggests increased capital spending to be a long-term trend in this industry.

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In line with these trends, many companies have announced aggressive capital spending programs. Forecast capital spending

¹⁵ Standard & Poor's, Credit Outlook For U.S. Investor-Owned Water Utilities Should Remain Stable in 2008, January 31, 2008, pp. 2 and 4.

primarily focuses on infrastructure replacements and growth initiatives. Over the past five years, capital spending has been equivalent to about three times its depreciation expense. However, companies are now forecasting spending to be at or above four times depreciation expense over the intermediate term. For companies in regulatory jurisdictions that provide timely cost recovery for capital expenditures, the increased spending is likely to have a minimal effect on financial metrics and ratings. However, companies in areas without these mechanisms, earnings, and cash flow could be negatively affected by the increased spending levels, which over the longer term could harm a company's overall credit profile.

Due to the high level of capital spending, U.S. investor-owned water utilities do not generate positive free cash flow. This, coupled with the forecast increase in capital spending over the intermediate term, will require additional access to capital markets. We expect rated water companies to have enough financial flexibility to gain that access. Ratings actions shouldn't result from this increased market activity because we expect companies to use a balanced financing approach, which should maintain debt near existing levels.

In addition, both the Congressional Budgeting Office (CBO) and the Environmental Protection Agency (EPA) have addressed the necessary future growth in water and wastewater utility infrastructure. In November 2002, the CBO published a study entitled, "Future Investment in Drinking Water and Wastewater Infrastructure" in which it concluded that ¹⁶:

CBO estimates that for the years 2000 to 2019, annual costs for investment will average between \$11.6 billion and \$20.1 billion for drinking water systems and between \$13.00 billion and \$20.9 billion for wastewater systems.

These estimates, over the ten years ending 2019, total from \$116.0 - \$201.0 billion for drinking water systems and between \$130.0 - \$209.0 billion for wastewater systems, totaling \$246.0 - \$410.0 billion for the water and

[&]quot;Future Investment in Drinking Water and Wastewater Infrastructure", The Congress of the United

wastewater industry combined.

Similarly, the EPA states the following¹⁷:

EPA found that the total infrastructure need nationwide is \$276.8 billion for the 20-year period of January 2003 through December 2022. With \$183.6 billion in needs over the next 20 years, transmission and distribution projects represent the largest category of need. This result is consistent with the fact that transmission and distribution mains account for most of the nation's water infrastructure. The other categories, in descending order of need, are: treatment, storage, source, and a miscellaneous category of needs called "other" that includes such items as security needs.

Clearly, then, with water and wastewater utility infrastructure growing anywhere from approximately \$250 - \$400 billion into and throughout the next decade and beyond, nearly 15 years from today, the growth in water utility rate base will not subside in the next five years or soon thereafter. In view of the foregoing, Mr. Janous' implication that the growth in water utility earnings will subside after the "next five years or so" is simply not substantiated.

Hence, there is no valid rationale for undertaking a two- or three-stage DCF analysis. There is no empirical evidence that in the second or even third stage any company, especially the relatively stable utility companies, would grow at the average of the U.S. economy. The average growth in the U.S. economy is just that, an average. Some companies will grow faster and some will grow slower. That the growth in nominal GDP is an average is demonstrated on Schedule PMA-19 which shows the nominal GDP for the years 1998-2007 as a whole and by industry. From 2006-2007, nominal GDP grew 4.90% and 5.23% on average for the ten years ending 2007. In contrast,

States - Congressional Budget Office, November 2002, p. ix.

[&]quot;Fact Sheet: "EPA's 2003 Drinking Water Infrastructure Needs Survey and Assessment", United

the manufacturing component of nominal GDP declined 10.70% from 2006 to 2007 and grew 4.63% on average for the ten years ending 2007. Likewise, the utilities component of nominal GDP grew 8.24% from 2006 to 2007 and an average 5.63% for the ten years ending 2007. In addition, it is a mismatch to use five- to ten-years growth in GDP as a proxy either for the years six or ten through perpetuity. There is no evidence that a five- to ten-years growth rate in GDP accurately represents the in perpetuity growth rate in GDP. Moreover, the results of his two- and three-stage DCF analysis fail a common sense test as they are inconsistent with the average litigated authorized ROEs shown on Schedule PMA-18. His average two- and three-stage DCF result of 8.73% and 9.02%, respectively for the water group and 9.20% and 9.30% for the gas distribution group, respectively are very near or below the low end of the range of authorized ROEs shown on Schedule PMA-18 of 9.10% and 12.12%.

In view of the foregoing, Mr. Janous' two- and three-stage DCF analyses should be rejected because the results fail a common sense test as they are woefully inadequate relative to recently authorized ROEs for electric and gas utilities against which MAWC must compete for capital in the capital markets.

In addition, all of Mr. Janous' DCF results for his gas distribution proxy group – 10.51% (single-stage), 9.20% (two-stage), and 9.30% (three-stage), understate the cost rate applicable to MAWC. While Mr. Janous selected a gas utility group comparable to MAWC in several other respects, the average market capitalization of the gas distribution proxy group is significantly greater than that of MAWC. As discussed in my direct testimony, at page 12, line 1

through page 14, line 19, size has a bearing on risk. And consistent with the basic financial concept of risk and return, investors demand greater returns to compensate them for the greater business risk inherent in a small company.

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On Schedule PMA-20 I have estimated the market capitalization of MAWC for the 13-weeks ending July 29, 2008 based upon the average marketto-book ratio of Mr. Janous' gas group for the same time period, of 185,3%. Hence, MAWC's market capitalization is estimated at \$561.730 million and the average gas company's is estimated at \$1,645.486 million, as shown on page 1 of Schedule PMA-20. As also discussed in my direct testimony, a business risk adjustment can be quantified by looking to Chapter 7 entitled "Firm Size and Return" from SBBI. The determinations are based upon the size premia for decile portfolios of the New York Stock Exchange (NYSE), American Stock Exchange (AMEX) and NASDAQ listed companies for the 1926-2007 time period as shown on Schedule PMA-20. The average size premium for the decile in which the gas distribution proxy group falls, i.e., the 6th decile, has been compared to the average size premia for the 8th and 9th deciles between which MAWC falls. As shown on page 1 of Schedule PMA-20, the size premium spread between MAWC and Mr. Janous' gas group is 0.78%. Adding this premium, 0.78% to the 10.51% single-stage, 9.20% two-stage and 9.30% three-stage DCF result for his gas distribution proxy group, indicates that riskadjusted gas group DCFs are in the range of 9.98% - 11.29% (11.29% = 10.51% + 0.78%), (9.98% = 9.20% + 0.78%), and (10.08% = 9.30% + 0.78%)which are more appropriately applicable to MAWC. However, for reasons

1 previously discussed relative to Mr. Janous' two- and three-stage DCF 2 analysis, even adjusted for MAWC's smaller size relative to the gas distribution 3 proxy group, these results should be rejected. 4 C. Risk Premium Model Q. 5 Do you have any comments regarding Mr. Janous' risk premium analysis? 6 Α. Yes. My comments center on the time period over which he estimates the equity 7 risk premium and his use of authorized returns to do so. 8 Q. Do you agree with Mr. Janous' use of the years 1986 – 2008 to determine an 9 equity risk premium? 10 No. It is especially inappropriate in view of his use of a two- and three-stage Α. 11 growth DCF model and his emphasis upon long-term sustainable growth. As 12 discussed previously in this rebuttal testimony and my direct testimony, SBBI 13 makes it clear that the arbitrary selection of short historical periods is highly 14 suspect and unlikely to be representative of long-term trends in market data. 15 Page 7 of Schedule PMA-15 clearly shows that it is inappropriate to estimate a 16 market equity risk premium over a short period of time. For example on page 7 17 SBBI states: 18 The estimate of the equity risk premium depends on the length 19 of the data series studied. . . requires a data series long 20 enough to give a reliable average. . . because an average of 21 the realized equity risk premium is quite volatile when calculated 22 using a short history, using a long series makes it less likely that 23 the analyst can justify any number he or she wants. . . . 24

As discussed in my direct testimony on page 28, line 16 through page 29, line 8, Phillips and Bonbright, et al make it very clear that the market prices of the

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common stocks of public utilities are influenced by factors which are beyond the direct influence of the regulatory process. Schedule PMA-21 demonstrates that there is no relationship between the market-to-book ratios and the earned rates of return on book common equity for the S&P Industrial Index and its successor, the S&P 500 Composite Index over a long period of time. Shown are the market-tobook ratios, rates of return on book common equity (earnings/book ratios), annual inflation rates, and the earnings/book ratios net of inflation (real rates of earnings) annually for the years 1947 through 2007. In each and every year, the market-tobook ratios equaled or exceeded 1.00 times. In only one year, 1949, did the market-to-book ratio actually equal 1.00 time, but never was it below 1.00 time. In 1961, when the S&P Industrial Index experienced a market-to-book ratio of 2.01 times, the real rate of earnings on book equity for the Index was only 9.1%. In 2007, the preliminary market-to-book ratio for the Index was 2.77 times, while the average real rate of earnings on book equity was 8.7%. Schedule PMA-20 demonstrates that competitive, non-price regulated companies have never sold below book value, on average, and have sold at book value in only one year since 1947. In addition, it is shown that there is no relationship between earnings/book ratios and market-to-book ratios.

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Because this lack of relationship between earnings/book ratios and market-to-book ratios covers a period in excess of 60 years, it is not reasonable to assume that a direct relationship will exist between rates of earnings on book common equity and market-to-book ratio into the future. Schedule PMA-20 confirms that while regulation is a substitute for marketplace competition, it has

- but a limited effect on, but no direct control over the market prices and hence market-to-book ratios of regulated utilities. Thus, no valid conclusion of equity risk premia can be drawn for the 1986 to first quarter 2008 because of market-tobook ratios in excess of one.
- Q. Have you applied an appropriate risk premium model to Mr. Janous' water andgas distribution proxy groups?
- 7 A. Yes. That information is shown on Schedule PMA-22. Using the same risk premium methodology described in my direct testimony on page 38, line 11 through page 48, line 9, a risk premium indicated common equity cost rate is 11.96% for Mr. Janous' group of water companies and 11.80% for his group of gas companies based upon current market conditions as summarized on page 1, Schedule PMA-22.

D. Capital Asset Pricing Model

14 Q. Please comment upon Mr. Janous' application of the CAPM.

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- A. Mr. Janous' application of the CAPM is flawed for three reasons. First, his derivation of the market equity risk premium is incorrect. Second, his "forward-looking" equity risk premium is not truly a prospective equity risk premium. Third, Mr. Janous failed to utilize the Empirical Capital Asset Pricing Model (ECAPM) in addition to the traditional CAPM.
- 20 Q. How is Mr. Janous' historical market equity risk premium incorrectly derived?
- A. Mr. Janous' used as his market equity risk premium the same <u>SBBI</u> arithmetic mean historical market equity risk premium as did Mr. Barnes. Namely, he utilized the difference between the arithmetic mean 1926-2007 total return on large

company stocks of 12.3% and the arithmetic mean 1926-2007 total return on long-term government bonds of 5.8% which results in a 6.5% market equity risk premium. As discussed previously, the correct derivation of the historical market equity risk premium is the difference between the total return on large company stocks of 12.3% and the arithmetic mean 1926-2007 income return on long-term government bonds of 5.2%, resulting in a market equity risk premium of 7.1%. The income return on long-term government bonds is the appropriate return to use in the estimation of the market equity risk premium because it represents the riskless portion of the return as discussed previously and note by <u>SBBI</u> on page 76.

Α.

- 11 Q. Why is Mr. Janous' "forward-looking" equity risk premium not truly forward-12 looking?
 - Mr. Janous derived his "forward-looking" equity risk premium by merely adding a current consensus analysts' inflation projection to <u>SBBI's</u> long-term historical arithmetic mean real market return for the years 1926-2007. Mr. Janous' calculation is mathematically incorrect. Mr. Janous states that the arithmetic average real market return over the period 1926-2007 was 9.0%. It is not. It is 9.2%, i.e., total return of 12.3% less an average inflation rate of 3.1% as shown on page 28 (Table 2-1) of <u>SBBI</u>. This would result in a "forward-looking" total return of 11.82% ([(1 + 0.092) * (1 + 0.024)]) in contrast to Mr. Janous' 11.60%. In addition, it is not appropriate to try and match a one-quarter forecast of inflation (2.4% forecasted for the fourth quarter of 2009) with an average real market return over a period of 82 years. In my opinion, investors would not attempt to do

such a thing. Rather, they would be influenced by a forecast such as that published by <u>Value Line</u> which is widely subscribed to and is available in the business reference section of most libraries. A more appropriate method of deriving the prospective equity market return is based upon <u>Value Line's</u> projected 3-5 year market appreciation potential, which when converted to an annual rate plus the market's median expected dividend yield results in a forecasted total annual market return of 18.15% as explained in note 1 on page 3 of Schedule PMA-23. This methodology yields a truly prospective market return which is based upon an important investor-influencing publication. However, as discussed previously in this rebuttal testimony and in my direct testimony, the stock market remains and continues to be extremely volatile. Therefore, the current <u>Value Line</u>-based forecasted total annual return on the market is unrepresentative of the expected long-term.

- Q. Why should Mr. Janous have included an ECAPM analysis in deriving his CAPM-based common equity cost rate?
 - A. As discussed previously in this rebuttal testimony and in my direct testimony at page 49, lines 13-36, the empirical Security Market Line (SML) described by the traditional CAPM is not as steeply sloped as the predicted SML. As Morin¹⁸ notes:

. . .low-beta securities earn returns somewhat higher than the CAPM would predict, and high-beta securities earn less than predicted.

¹⁸ Id., at p. 175.

Hence, both the traditional CAPM and ECAPM should be used in deriving a CAPM-based common equity cost rate. I have shown the results of applying both the traditional CAPM and ECAPM to Mr. Janous' water and gas distribution companies using the correctly derived historical market equity risk premium. As shown on page 1 of Schedule PMA-23, the traditional CAPM result is 11.85% for the water proxy group and 11.28% for the gas proxy group while the ECAPM result is 11.94% for the water proxy group and 11.51% for the gas proxy group. The average of both cost rates is 11.90% for the water proxy group and 11.40% for the gas proxy group.

Q.

A.

- On page 24, lines 5-14 of his direct testimony, Mr. Janous asserts that the results of his CAPM analysis for his water proxy group represents an unreasonably high estimate of the return on common equity for MAWC due to the level of the water company betas. Please comment.
- Mr. Janous asserts that the current level of betas for the water proxy group are high "as result of the current period of relatively high growth due to the significant investment in rate base." This statement is incorrect on two counts. First, as previously discussed, the water utility industry is and has been for quite some time facing significant capital expenditures necessary to replace aging infrastructure and to add additional rate base due to growth. As demonstrated previously, the CBO and EPA are estimating that the water utility industry will face significantly high capital expenditures well into the future. Therefore, Mr. Janous' assertion that the currently "high" level of betas for the water utility industry is due to the "current period of relative high growth due to the significant investment in

rate base" is unfounded. Second, beta is a measure of systematic, market or non-diversifiable risk. While beta does contain a modicum of business or company-specific risk, CAPM theory assumes that overwhelming majority business or company-specific risk can be diversified away by investors. Therefore, it is inconsistent with CAPM theory to attribute the current level of water utility betas to the industry's "significant investment in rate base", a company or industry specific risk.

- 8 Q. Does that conclude your rebuttal testimony?
- 9 A. Yes.

Exhibit No.:

issues:

Return on Equity Pauline M. Ahern

Witness: Exhibit Type:

Rebuttal

Sponsoring Party: Missouri-American Water

Company

Case No.: Date:

WR-2008-0311 September 30, 2008

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. WR-2008-0311

EXHIBIT

TO ACCOMPANY THE

REBUTTAL TESTIMONY

QF

PAULINE M. AHERN, CRRA

ON BEHALF OF

MISSOURI AMERICAN WATER COMPANY

Missouri-American Water Company

Capital Asset Pricing Model (CAPM) Cost-of-Common-Equity Estimates for MoPSC Staff Witness Barnes' Four Comparable Water Utility Companies Corrected to Reflect a Prospective Risk-Free Rate and Historical Market Equity Risk Premium

·	<u>1</u>	<u>2</u>	<u>3</u>	4	<u>5</u>
		Traditio	nal Capital Asset Pri	cing Model	
MoPSC Staff Witness Barnes' Four Comparable Water Utility Companies	Risk-Free Rate (1)	Company's Beta (2)	Market Risk Premium (3)	Beta Adjusted Market Risk Premlum (4)	Cost of Common Equity (5)
American States Water Company	4.69%	1.05	7.10%	7.46%	12.15%
Agua America, Inc.	4.69%	0.95	7.10%	6.75%	11.44%
California Water Services Group	4.69%	1.15	7.10%	8.17%	12.86%
Middlesex Water Company	4.69%	0.90	7.10%	6.39%	11.08%
Average	4.69%	1.01	7.10%	7.19%	11.88%

- Notes: (1) From Column 1 of MoPSC Staff Witness Barnes' Schedule 17.
 - (2) From Column 1 of MoPSC Witness Barnes's Schedule 17.
 - (3) Derived in note 1 on page 3 of Schedule PMA-23.
 - (4) Column 2 * Column 3.
 - (5) Column 1 + Column 4.
 - (6) The empirical CAPM is applied using the formula found in note 4 on page 3 of Schedule PMA-23.

Missouri-American Water Company Capital Asset Pricing Model (CAPM) Cost-of-Common-Equity Estimates for MoPSC Staff Witness Barnes' Four Comparable Water Utility Companies Corrected to Reflect a Prospective Risk-Free Rate and Historical Market Equity Risk Premium

1	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>
	Traditio	nal Capital Asset Pr	icing Model	.,
Risk-Free Rate (1)	Company's Beta (2)	Market Risk Premium (3)	Beta Adjusted Market Risk Premium (4)	Cost of Common Equity (5)
4.78% 4.78% 4.78% 4.78%	1.05 0.95 1.15 0.90	7.10% 7.10% 7.10% 7.10%	7.46% 6.75% 8.17% 6.39%	12.24% 11.53% 12.95% 11.17%
4.78%	1.01	7.10%	7.19%	11.97%
	Empirio	cal Capital Asset Pri	cing Model	
Risk-Free Rate (1)	Empirio Company's Beta (2)	cal Capital Asset Pri Market Risk Premium (3)	cing Model Beta Adjusted Market Risk Premium (6)	Cost of Common Equity (5)
	Company's	Market Risk	Beta Adjusted Market Risk	Common
	Risk-Free Rate (1) 4.78% 4.78% 4.78% 4.78%	Risk-Free Company's Rate (1) Beta (2) 4.78% 1.05 4.78% 0.95 4.78% 1.15 4.78% 0.90	Risk-Free Company's Market Risk Rate (1) Beta (2) Premium (3) 4.78% 1.05 7.10% 4.78% 0.95 7.10% 4.78% 1.15 7.10% 4.78% 0.90 7.10%	Traditional Capital Asset Pricing Model Risk-Free Company's Market Risk Market Risk Premium (3) Premium (4)

Average of Traditional and Empirical CAPM

11.96%

Notes: (1) Average forecast based upon six quarterly estimates of 30-year Treasury Note yields per the consensus of nearly 50 economists reported in the Blue Chip Financial Forecasts dated September 1, 2008 (see page 3 of this Schedule The estimates are detailed below:

Third Quarter 2008	4.60 %
Fourth Quarter 2008	4.60
First Quarter 2009	4.70
Second Quarter 2009	4.80
Third Quarter 2009	4.90
Fourth Quarter 2009	5.10
Average	4.78 %

- (2) From MoPSC Witness Mr. Barnes's Schedule 17.
- (3) Derived in note 1 on page 3 of Schedule PMA-23.
 (4) Column 2 * Column 3.
 (5) Column 1 + Column 4.

- (6) The empirical CAPM is applied using the formula found in note 4 on page 3 of Schedule PMA-23.

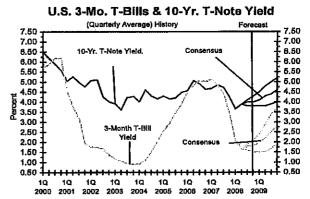
2 ■ BLUE CHIP FINANCIAL FORECASTS ■ SEPTEMBER 1, 2008

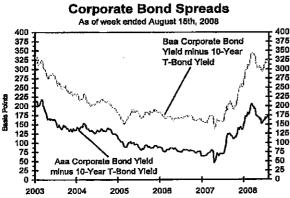
Consensus Forecasts Of U.S. Interest Rates And Key Assumptions¹

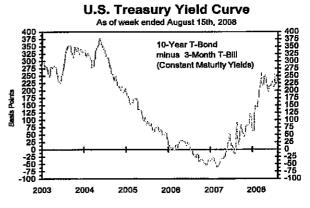
				Histo	ry				Cons	ensus l	Foreca:	sts-Qu	arterly	Avg.
	A	verage Fo	r Week E	nd	Ave	age For N	Month	Latest Q	3Q	4Q	1Q	2Q	3Q	4Q
Interest Rates	Aug. 15	Aug. 8	<u>Aug. 1</u>	<u>July 25</u>	<u>Jul.</u>	<u>Jun.</u>	May	2O 2008	2008	2008	<u>2009</u>	<u>2009</u>	<u>2009</u>	<u>2009</u>
Federal Funds Rate	1.99	2.02	2.08	1.99	2.01	2.00	1.98	2.09	2.0	2.0	2.0	2.2	2.6	2.9
Prime Rate	5.00	5.00	5.00	5.00	5.00	5.00	5.00	5.08	5.0	5.0	5.1	5.3	5.6	5.9
LIBOR, 3-mo.	2.80	2.80	2.79	2.79	2.79	2.77	2.69	2.75	2.8	2.8	2.8	2.9	3.1	3.4
Commercial Paper, 1-mo.	2.03	2.03	2.05	2.03	2.08	2.14	1.99	2.08	2.3	2,3	2.4	2.5	2.9	3.2
Treasury bill, 3-mo.	1.86	1.70	1.70	1.60	1.66	1.89	1.76	1.65	1.8	1.8	2.0	2.2	2.5	2.8
Treasury bill, 6-mo.	2.02	1.95	1.91	1.93	1.98	2.19	1.86	1.88	2.0	2.0	2.2	2.4	2.8	3.1
Treasury bill, 1 yr.	2.18	2.23	2.30	2.33	2.28	2.42	2.06	2.07	2.2	2.3	2.4	2.7	3.0	3.3
Treasury note, 2 yr.	2.47	2.51	2.58	2.70	2,57	2.77	2.45	2.42	2.5	2.6	2.7	2.9	3.2	3.5
Treasury note, 5 yr.	3.18	3.24	3.31	3.44	3.30	3.49	3.15	3.16	3.2	3.3	3.4	3.6	3.8	4.0
Treasury note, 10 yr.	3.91	3.99	4.04	4.11	4.01	4.10	3.88	3.89	4.0	4.0	4.1	4.3	4.4	4.6
Treasury note, 30 yr.	4.54	4.60	4.61	4.66	4.57	4.69	4.60	4.58	4.6	4.6	4.7	4.8	4.9	5.1
Corporate Asa bond	5.68	5.74	5.73	5.78	5.67	5.68	5.57	5.60	5.7	5.7	5.8	5.9	6.0	6.1
Corporate Baa bond	7.17	7.22	7.21	7.27	7.16	7.07	6.93	6.99	7.1	7.1	7.1	7.2	7.3	7.4
State & Local bonds	4.67	4.75	4.74	4.77	4.68	4.69	4.58	4.66	4.7	4.7	4.7	4.8	4.9	5.0
Home mortgage rate	6.52	6.52	6.52	6.63	6.43	6.32	6.04	6.09	6.4	6.4	6.4	6.4	6.5	6.6
	4			Histor	y				Cons	ensus l	Poreca:	ts-Qu	rterly	Avg.
	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q -	4Q	1Q	2Q	3Q	4Q
Key Assumptions	<u>2006</u>	2006	2007	<u>2007</u>	2007	2007	2008	<u>2008</u>	2008	2008	<u>2009</u>	<u> 2009</u>	<u>2009</u>	<u> 2009</u>
Major Currency Index	81.7	81.6	81.9	79.3	77.0	73,3	72.0	70.9	72.4	73.3	74.2	74.9	75.5	76.2
Real GDP	0.8	1.5	0.1	4.8	4.8	-0.2	0,9	1.9	1.0	0.2	0.9	1.9	2.3	2.6
GDP Price Index	2.8	2.2	4.1	2.0	1.5	2.8	2.6	1.1	3.1	2.7	2.5	2.0	2.2	2.2
Consumer Price Index	3.8	-1.6	3.8	4.6	2.7	5.1	4.2	5.0	5.7	2.8	2.6	2,2	2.4	2.4

Individual panel members' forecasts are on pages 4 through 9. Historical data for interest rates except LIBOR is from Federal Reserve Release (FRSR) H.15. LIBOR quotes available from The Wall Street Journal. Definitions reported here are same as those in FRSR H.15. Treasury yields are reported on a constant maturity basis. Historical data for the U.S. Federal Reserve Board's Major Currency Index is from FRSR H.10 and G.5. Historical data for Real GDP and GDP Chained Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index (CPI) history is from the Department of Labor's Bureau of Labor Statistics (BLS).

U.S. Treasury Yield Curve Week ended August 15th, 2008 and Year Ago vs. 3Q 2008 and 4Q 2009 Consensus forecasts 6.00 6.00 5.50 5.50 5,00 5.00 4,50 4.60 4.00 4.00 3.50 3.60 3.00 3.00 2.50 2.50 2,00 Week ended 08/15/08 2,00 1,50 Consensus 4Q 2009 1.50 1.00 Consensus 3D 2008 0.50 1.00 30yr 3mo 6ma 1yr 2yr 5уг 10ут Maturities

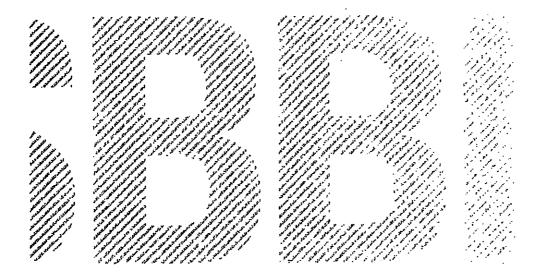






Ibbotson° SBBi° 2008 Valuation Yearbook

Market Results for Stocks, Bonds, Bills, and Inflation 1926–2007





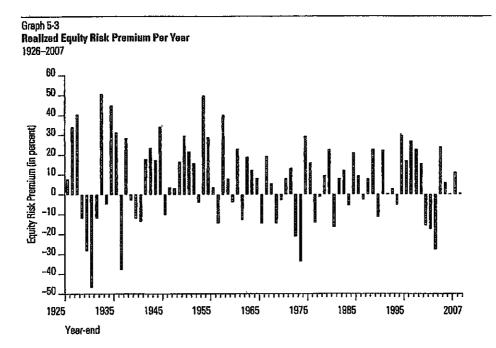
For example, if bond yields rise unexpectedly, investors can receive a higher coupon payment from a newly issued bond than from the purchase of an outstanding bond with the former lower-coupon payment. The outstanding lower-coupon bond will thus fail to attract buyers, and its price will decrease, causing its yield to increase correspondingly, as its coupon payment remains the same. The newly priced outstanding bond will subsequently attract purchasers who will benefit from the shift in price and yield; however, those investors who already held the bond will suffer a capital loss due to the fall in price.

Anticipated changes in yields are assessed by the market and figured into the price of a bond. Future changes in yields that are not anticipated will cause the price of the bond to adjust accordingly. Price changes in bonds due to unanticipated changes in yields introduce price risk into the total return. Therefore, the total return on the bond series does not represent the riskless rate of return. The income return better represents the unbiased estimate of the purely riskless rate of return, since an investor can hold a bond to maturity and be entitled to the income return with no capital loss.

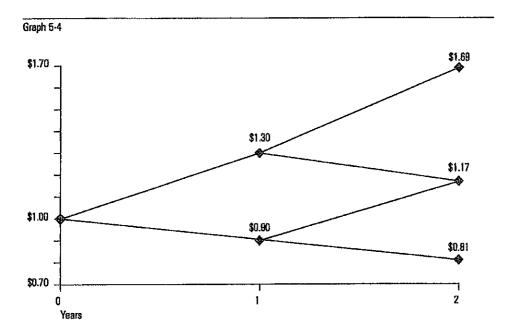
Arithmetic versus Geometric Means

The equity risk premium data presented in this book are arithmetic average risk premia as opposed to geometric average risk premia. The arithmetic average equity risk premium can be demonstrated to be most appropriate when discounting future cash flows. For use as the expected equity risk premium in either the CAPM or the building block approach, the arithmetic mean or the simple difference of the arithmetic means of stock market returns and riskless rates is the relevant number. This is because both the CAPM and the building block approach are additive models, in which the cost of capital is the sum of its parts. The geometric average is more appropriate for reporting past performance, since it represents the compound average return.

The argument for using the arithmetic average is quite straightforward. In looking at projected cash flows, the equity risk premium that should be employed is the equity risk premium that is expected to actually be incurred over the future time periods. Graph 5-3 shows the realized equity risk premium for each year based on the returns of the sar 500 and the income return on long-term government bonds. (The actual, observed difference between the return on the stock market and the riskless rate is known as the realized equity risk premium.) There is considerable volatility in the year-by-year statistics. At times the realized equity risk premium is even negative.



To illustrate how the arithmetic mean is more appropriate than the geometric mean in discounting cash flows, suppose the expected return on a stock is 10 percent per year with a standard deviation of 20 percent. Also assume that only two outcomes are possible each year: +30 percent and -10 percent (i.e., the mean plus or minus one standard deviation). The probability of occurrence for each outcome is equal. The growth of wealth over a two-year period is illustrated in Graph 5-4.



The most common outcome of \$1.17 is given by the geometric mean of 8.2 percent. Compounding the possible outcomes as follows derives the geometric mean:

$$[(1+0.30)\times(1-0.10)]^{8}-1=0.082$$

However, the expected value is predicted by compounding the arithmetic, not the geometric, mean. To illustrate this, we need to look at the probability-weighted average of all possible outcomes:

Therefore, \$1.21 is the probability-weighted expected value. The rate that must be compounded to achieve the terminal value of \$1.21 after 2 years is 10 percent, the arithmetic mean:

$$1 \times (1 + 0.10)^2 = 1.21$$

The geometric mean, when compounded, results in the median of the distribution:

$$1 \times (1 + 0.082)^2 = 1.17$$

The arithmetic mean equates the expected future value with the present value; it is therefore the appropriate discount rate.

Appropriate Historical Time Period

The equity risk premium can be estimated using any historical time period. For the U.S., market data exists at least as far back as the late 1800s. Therefore, it is possible to estimate the equity risk premium using data that covers roughly the past 100 years.

Our equity risk premium covers the time period from 1926 to the present. The original data source for the time series comprising the equity risk premium is the Center for Research in Security Prices. CRSP chose to begin their analysis of market returns with 1926 for two main reasons. CRSP determined that the time period around 1926 was approximately when quality financial data became available. They also made a conscious effort to include the period of extreme market volatility from the late twenties and early thirties; 1926 was chosen because it includes one full business cycle of data before the market crash of 1929. These are the most basic reasons why our equity risk premium calculation window starts in 1926.

Implicit in using history to forecast the future is the assumption that investors' expectations for future outcomes conform to past results. This method assumes that the price of taking on risk changes only slowly, if at all, over time. This "future equals the past" assumption is most applicable to a random time-series variable. A time-series variable is random if its value in one period is independent of its value in other periods.

Does the Equity Risk Premium Revert to Its Mean over Time?

Some have argued that the estimate of the equity risk premium is upwardly biased since the stock market is currently priced high. In other words, since there have been several years with extraordinarily high market returns and realized equity risk premia, the expectation is that returns and realized equity risk premia will be lower in the future, bringing the average back to a normalized level. This argument relies on several studies that have tried to determine whether reversion to the mean exists in stock market prices and the equity risk premium. Several academics contradict each other on this topic; moreover, the evidence supporting this argument is neither conclusive nor compelling enough to make such a strong assumption.

Our own empirical evidence suggests that the yearly difference between the stock market total return and the U.S. Treasury bond income return in any particular year is random. Graph 5-3, presented earlier, illustrates the randomness of the realized equity risk premium.

³ Fama, Eugene F., and Kenneth R. French. "Permanent and Temporary Components of Stock Prices," Journal of Political Economy, April 1988, pp. 246-273. Poterba, James M., and Lawrence H. Summers. "Mean Reversion in Stock Prices," Journal of Financial Economics, October 1988, pp. 27-59. Lo, Andrew W., and A. Craig MacKinlay. "Stock Marker Prices Do Not Follow Random Walks: Evidence from a Simple Specification Test," The Review of Financial Studies, Spring 1988, pp. 41-66. Finnerty, John D., and Dean Leistikow. "The Behavior of Equity and Debt Risk Premiums: Are They Mean Reverting and Downward-Trending?" The Journal of Portfolio Management, Summer 1993, pp. 73-84. Ibbotson, Roger G., and Scott L. Lummer. "The Behavior of Equity and Debt Risk Premiums: Comment," The Journal of Portfolio Management, Summer 1994, pp. 98-200. Finnerty, John D., and Dean Leistikow. "The Behavior of Equity and Debt Risk Premiums: Reply to Comment," The Journal of Portfolio Management, Summer 1994, pp. 101-102.

A statistical measure of the randomness of a return series is its serial correlation. Serial correlation (or autocorrelation) is defined as the degree to which the return of a given series is related from period to period. A serial correlation near positive one indicates that returns are predictable from one period to the next period and are positively related. That is, the returns of one period are a good predictor of the returns in the next period. Conversely, a serial correlation near negative one indicates that the returns in one period are inversely related to those of the next period. A serial correlation near zero indicates that the returns are random or unpredictable from one period to the next. Table 5-3 contains the serial correlation of the market total returns, the realized long-horizon equity risk premium, and inflation.

Table 5-3 Interpretation of Annual Serial Correlations 1928–2007

Series	Serial Correlation	jutarktájatjou
Larga Company Stock Total Returns	0.03	Random
Equity Risk Premium	0.03	Rendom
Initiation Rates	0.65	Trend

The significance of this evidence is that the realized equity risk premium next year will not be dependent on the realized equity risk premium from this year. That is, there is no discernable pattern in the realized equity risk premium—it is virtually impossible to forecast next year's realized risk premium based on the premium of the previous year. For example, if this year's difference between the riskless rate and the return on the stock market is higher than last year's, that does not imply that next year's will be higher than this year's. It is as likely to be higher as it is lower. The best estimate of the expected value of a variable that has behaved randomly in the past is the average (or arithmetic mean) of its past values.

Table 5-4 also indicates that the equity risk premium varies considerably by decade. The complete decades ranged from a high of 17.9 percent in the 1950s to a low of 0.3 percent in the 1970s, however, thus far the 2000s have shown a -2.4 percent equity risk premium. This look at historical equity risk premium reveals no observable pattern.

Table 5-4			
Long-Horizon Equity Ris	k Premium by Decar	le	
	in i tomidan by boods		
1926-2007			

1920s*	1930s	1940a	1950s	1960s	1970a	1980s	1990s	2000s**	1997-2007
17.6%	2.3%	8.0%	17.9%	4.2%	0.3%	7.9%	12.1%	-2.4%	4.2%

^{*}Based on the period 1928-1929.

[&]quot;Based on the period 2000-2007.

Finnerty and Leistikow perform more econometrically sophisticated tests of mean reversion in the equity risk premium. Their tests demonstrate that—as we suspected from our simpler tests—the equity risk premium that was realized over 1926 to the present was almost perfectly free of mean reversion and had no statistically identifiable time trends. Lo and MacKinlay conclude, "the rejection of the random walk for weekly returns does not support a mean-reverting model of asset prices."

Choosing an Appropriate Historical Period

The estimate of the equity risk premium depends on the length of the data series studied. A proper estimate of the equity risk premium requires a data series long enough to give a reliable average without being unduly influenced by very good and very poor short-term returns. When calculated using a long data series, the historical equity risk premium is relatively stable. Furthermore, because an average of the realized equity risk premium is quite volatile when calculated using a short history, using a long series makes it less likely that the analyst can justify any number he or she wants. The magnitude of how shorter periods can affect the result will be explored later in this chapter.

Some analysts estimate the expected equity risk premium using a shorter, more recent time period on the basis that recent events are more likely to be repeated in the near future; furthermore, they believe that the 1920s, 1930s, and 1940s contain too many unusual events. This view is suspect because all periods contain "unusual" events. Some of the most unusual events of the last hundred years took place quite recently, including the inflation of the late 1970s and early 1980s, the October 1987 stock market crash, the collapse of the high-yield bond market, the major contraction and consolidation of the thrift industry, the collapse of the Soviet Union, the development of the European Economic Community, and the attacks of September 11, 2001.

It is even difficult for economists to predict the economic environment of the future. For example, if one were analyzing the stock market in 1987 before the crash, it would be statistically improbable to predict the impending short-term volatility without considering the stock market crash and market volatility of the 1929-1931 period.

Without an appreciation of the 1920s and 1930s, no one would believe that such events could happen. The 82-year period starting with 1926 is representative of what can happen: it includes high and low returns, volatile and quiet markets, war and peace, inflation and deflation, and prosperity and depression. Restricting attention to a shorter historical period underestimates the amount of change that could occur in a long future period. Finally, because historical event-types (not specific events) tend to

- 4 Though the study performed by Finnerty and Leistikow demonstrates that the traditional equity risk premium exhibits no mean reversion or drift, they conclude that, "the processes generating these risk premiums are generally mean-reverting." This conclusion is completely unrelated to their statistical findings and has received some criticism. In addition to examining the traditional equity risk premia, Finnerty and Leistikow include analyses on "real" risk premia as well as separate risk premia for income and capital gains. In their comments on the study, Ibbotson and Lummer show that these "real" risk premia adjust for inflation twice, "creating variables with no economic content." In addition, separating income and capital gains does not shed light on the behavior of the risk premia as a whole.
- 5 This assertion is further corroborated by data presented in Global Investing: The Professional's Guide to the World of Capital Markets (by Roger G. Ibbotson and Gary P. Brinson and published by McGraw-Hill, New York). Ibbotson and Brinson constructed a stock market total return series back to 1790. Even with some uncertainty about the accuracy of the data before the mid-nineteenth century, the results are remarkable. The real (adjusted for inflation) returns that investors received during the three 50-year periods and one 51-year period between 1790 and 1790 did not differ greatly from one another (that is, in a statistically significant amount). Nor did the real returns differ greatly from the overall 201-year average. This finding implies that because real stock-market returns have been reasonably consistent over time, investors can use these past returns as reasonable bases for forming their expectations of future returns.

repeat themselves, long-run capital market return studies can reveal a great deal about the future. Investors probably expect "unusual" events to occur from time to time, and their return expectations reflect this.

A Look at the Historical Results

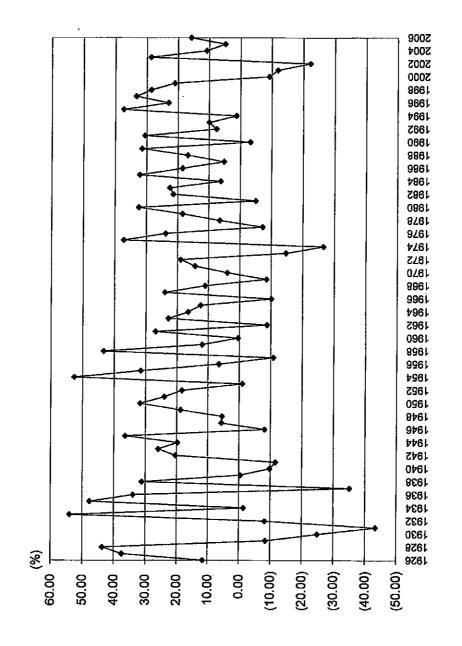
It is interesting to take a look at the realized returns and realized equity risk premium in the context of the above discussion. Table 5-5 shows the average stock market return and the average (arithmetic mean) realized long-horizon equity risk premium over various historical time periods. Similarly, Graph 5-5 shows the average (arithmetic mean) realized equity risk premium calculated through 2007 for different starting dates. The table and the graph both show that using a longer historical period provides a more stable estimate of the equity risk premium. The reason is that any unique period will not be weighted heavily in an average covering a longer historical period. It better represents the probability of these unique events occurring over a long period of time.

Table 5-5 Stock Market Return and Equity Risk Premium Over Time 1926-2007

Period Length	Period Dates	Large Company Stock Arithmetic Mean Total Return	Long-Horizon Equity Alsk Premium
	1926-2007	12.3%	7.1%
82 Years	1938-2007	12.8%	7.3%
70 Years 60 Years	19482007	13.1%	7.1%
50 Years	1958-2007	12.2%	5.5%
40 Years	1968-2007	11.8%	4.4%
30 Years	1978-2007	14.0%	6.3%
20 Years	1988-2007	13.0%	6.6%
15 Years	1993-2007	11.8%	6.0%
10 Years	1998-2007	7.2%	1.9%
5 Years	2003-2007	13.2%	8.3%

Looking carefully at Graph 5-5 will clarify this point. The graph shows the realized equity risk premium for a series of time periods through 2007, starting with 1926. In other words, the first value on the graph represents the average realized equity risk premium over the period 1926-2007. The next value on the graph represents the average realized equity risk premium over the period 1927-2007, and so on, with the last value representing the average over the most recent five years, 2003-2007. Concentrating on the left side of Graph 5-5, one notices that the realized equity risk premium, when measured over long periods of time, is relatively stable. In viewing the graph from left to right, moving from longer to shorter historical periods, one sees that the value of the realized equity risk premium begins to decline significantly. Why does this occur? The reason is that the severe bear market of 1973-1974 is receiving proportionately more weight in the shorter, more recent average. If you continue to follow the line to the right, however, you will also notice that when 1973 and 1974 fall out of the recent average, the realized equity risk premium jumps up by nearly 1.2 percent.

Missouri American Water Company Large Company Stock Returns From 1926 to 2007



Stocks Bonds Bills and Inflation - Market Results for 1926-2007 - 2008 Yearbook Valuation Edition, Morningstar, Inc., 2008 Chicago, IL. Source of Information:

Total Returns on Large Company Stocks Missouri American Water Company 1926 to 2007

								1954	1933	809
							1958	1935		20%
1997 1995 1991	1989 1985	1980	1975	1955	1950	1945	-	-	•	40%
2003 1999 1998	1996 1983	1982	1976	1967	1963	1961	1951	1943	1942	30%
2006 2004 1988 1986 1979									1926	20%
2007 2005 1994	1993 1992	1987	1984	1978	1970	1960	1956	1948	1947	10%
1990	1977 1969	1962	1953	1946	1940	1939	1934	1932	1929	%0 %
				2001	2000	1973	1966	1957	1941	% -10%
	Large Company Stocks						2002	1974	1930	% -20%
	npany								1937	% -30%
(ge Cor								1931	% 4 0%
1	re I								. 4	503

Arithmetic Mean: $r_A = \sum_{t=1}^{n} n$

Source: Stocks, Bonds, Bills, and Inflation - Market Results for 1926-2007 - 2008 Yearbook Valuation Edition,

pp. 30-31, Morningstar, Inc., Chicago, IL

Total Returns on Large Company Stocks Missouri American Water Company 1926 to 2007

Large Company Stocks

2007

%09 20% 40% 30% Geometric Mean: $r_G = \left[V_n / V_0 \right]$ 20% 1926 10% % -20% -10% -30% 40%

Source: Stocks, Bonds, Bills, and Inflation – Market Results for 1926-2007 – 2008 Yearbook Valuation Edition, pp. 30-31, Morningstar, Inc., Chicago, IL

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Total D	ebt \$316	6.4 mil. i	ez or <i>s</i> yst Due in 6 \ LT interes	/rs \$41.1		148.1 14.6	173.4 18.1	184.0 18.0	197,5 20,4	209.2 20.3	212.7 11.9	228.0 16,5	236.2 22.5	268.6 23.1	301.4 28.0	302 30.0	325 35.0	Revenue Net Prof			41 50.
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1.82 1.70 1.82 1.84	1.86	2.02	2.09	2.41	2.46	2.70	2.85	2.87	3.48	3.85	4.03	4.52	4.80	5,00	Revenue		OD- HIV	5
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	100100	, Jup 1,	62.7%	62.0%	52.0%	52.2%	64,2%	51.4%	60.0%	52,0%	61.6%	55.1%	54.5%	54.0%	Cong-Ter	in Dobt R	atio	61,
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ARKET CAP: \$2.0 billion (Mid C	•		12.4%	123%	11.7%	12.4%	12.7%	10.2%	10,7%	11.2%	10.0%	9.7%	11.0%			n Shī, Eqt n Com Eq		12.0
UHRENT POSITION 2008	2007 3				479.	5.1%	5,2%	4 000	4.6%	4.0%	270		4 247					
(\$MILL)		3/31/08	4.5% 64%	4.3% 65%	4,7% 80%			4.2% 50%			3.7%	3.2%	4.5%			to Com E		5.5
(\$MILL)		- 1	64%	65%	60%	58%	59%	69%	57%	56%	63%	67%	61%	69%	All Div'di	to Net Pr	rof	- 57
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		\$700 ml	llion (Sm:	all Cap)	}	10,8% 2.6%	3,5%	10.1%	7,2% NMF	9.5%	7.9%	9.0% 2.1%	2.1%	8.8% 1,0%	8.1%	8.5% 2.0%	9.5%	Return or Relained	Com Eq	uily	11.0% 5.5%
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Missouri American Water Company Authorized Returns on Common Equity and Common Equity Ratios for Electric and Gas Distribution Companies from January 2008 through June 2008

Date	Company	Type of Utility	State	Authorized Return on Common		Authorized Common Equity Ratio	Yield on Moody's A Rated Public Utility Bonds (1)	Spread
8-Jan-08	Northern States Power-Wisconsin	Electric	WI	10.75	_	52.51		
8-Jan-08	Northern States Power-Wisconsin	Gas	WI	10.75		52.51 52.51	5.97 5.97	4.78 4.78
17-Jan-08	Wisconsin Electric Power	Electric	Wi	10.75	(4)	54.36	5.97 5.97	4.78 4.78
17-Jan-08	Wisconsin Electric Power	Gas	wi	10.75	(4)	54.36	5.97 5.97	4.78 4.78
17-Jan-08	Wisconsin Gas	Gas	Wi	10.75		46.64	5.97 5.97	4.78
28-Jan-08	Connecticut Light & Power	Electric	CT		(4,5)	48.99	5.97 6.16	3.24
30-Jan-08	Potomac Electric Power	Electric	DC			46.55	6.16	3.24 3.84
31-Jan-08	Central Vermont Public Service	Electric	VT	10.71		50.02	6.16	3.64 4.55
5-Feb-08	North Shore Gas	Gas	iL	9.99	(2)	56.00	6.16	
5-Feb-08	Peoples Gas Light and Coke	Gas	IL	10.19		56.00	6.16	3.83 4.03
6-Feb-08	Interstate Power and Light	Electric	ΙĀ	11.70		NA	6.16	
13-Feb-08	Indiana Gas	Gas	IÑ	10.20	(2)	48.99	6.16	5.54 4.04
29-Feb-08	Fitchburg Gas & Electric	Electric	MA	10.25		42.80	6.02	4.23
12-Mar-08	PacifiCorp	Electric	WY	10.25		50.80	6.02	4.23 4.23
25-Mar-08	Consolidated Edison of New York	Electric	NY	9.10		47.98	6.21	2.89
31-Mar-08	Virginia Electric Power	Electric	VA	12.12	(3)	47.90 NA	6.21	2.89 5.91
31-Mar-08	Avista Corp.	Gas	OR	10.00	12.43	50.00	6.21	3.79
23-Apr-08	MDU Resources	Electric	MT	10.25		50.67	6.21	3.79 4.04
24-Apr-08	Public Service Company of New Mexico		NM	10.10	(2.1)	51.37	6.21	3.89
1-May-08	Hawaiian Electric Company	Efectric	HI	10.70	(2.2)	55.79	6.21	
27-May-08	UNS Electric	Electric	AZ	10.00	(2.3)	48.85	6.29	4.49 3.71
28-May-08	Duke Energy	Gas	OH	10.50	(2)	55.76	6.29	3.71 4.21
10-Jun-08	Consumers Energy	Electric	MI	10.70		41.75	6.29	
16-Jun-08	MidAmerican Energy	Electric	IA	11.70	(3)	41.75 NA	6.29	4.41
24-Jun-08	Almos Energy	Gas	ΤX	10.00		48.27	6.27	5.41 3.73
26-Jun-08	Appalachian Power	Electric	wv	10.50	(2)	40.27 41.54	6.27	
27-Jun-08	Sierra Pacific Power	Electric	NV	10.60	(2)	43.49	6.27	4.23 4.33
	Average - All Cases			10.47	%	49.83 %	6.16 %	<u>4.31</u> %
	Average - Litigated Cases			10.50	%	<u>49.53</u> %	6.10 %	4.40 %
Prospective Yie	ld on A Rated Public Utility Bonds (8)							6.59 %
Common Equity	l between Authorized Returns on and the Yields on Moody's A-rated							
•	nds for Litigated Cases							4.40_
Indicated Comn	ion Equity Cost Rate							<u>10.99</u> %

NA = Not Available

Notes:

- (1) Actual A rated yield represents the yield of the previous month if the order was issued on or after the 21st of each month, or the yield of two months prior if the order was issued on or before the 20th of each month. For example, the yield for 1/17/08 is the A rated
- Public Utility yield for November 2007 and the yield for 1/28/08 is the A rated Public Utility yield for December 2007.

 (2) Order followed full or partial stipulation settlement by the parties. Decision particulars not necessarily precedent-setting or specifically adopted by the regulatory body.

 Interim rate implemented prior to the issuance of final order, normally under bond and subject to refund.
- Rate change to be implemented in multiple steps.
- Rate change applicable to electric delivery only. Indicated rate increase to be phased-in over four years, with a 6.88% ROR authorized for 2006, 6.89% for 2007, 7.09% for 2008. and 7.48% for 2009.
- (7) Rate increase effective 2/20/08.
- (8) From page 1 of Schedule PMA-22.

Major Rate Case Decisions - January 2008 - June 2008, Published by Regulatory Research Associates, Inc., An SNL Energy Company, July 2, 2008

Mergent Bond Record Monthly Update, September 2008, Vol. 75, No. 9

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	2004	11685901	142160	114673	/OF/7	55	30333	26683	24027	129210	807475	37477	48335	54533	25151	200,000	65859	106942	70877	31196	67357	620413	191045	2015	200	45554	58621	198746	67314	/c0000	344625	49142	29835	9210	17580	10571	85337	3155	530619	130830	40243	302218	2578777	Zer us ca
2007.	2003	10950770	114363	58267	167.45	23817	27238	222	219976	4360427	12/2	S S	45134	38352	106.304	2000	48804	124085	25	3447	62828	587533	2 i	7000	503	45249	39148	179485	20.0	75148	316576	51729	28079	8228	16066	9858	75425	26320	189083	123548	38262	1000	48318 2244618	7
eers 1996 - '	2002	10469601	9151 W	70819	72400	2728	26834	16946	207326	1153840	74784	30421	45941	4:943	107403		48785	118882	69842	31061	60029	57.7855	1288 1288 1288 1288 1288 1288 1288 1288	21842	563	45962	26246	174363	200	915365	304557	48336	2619	828	288	11519	73378	2684	482981	118983	3884	2/23/2	2141889	7
Missouri American Water Company n Gross Domesic Product for the Y	2002	10127976	97895	<u> </u>	19747	72515	27082	19140	202288	2452	778877	31313	44862	41072	2 t	200	49194	103684	57158	30200	57234	262459	51123	2 2	8 8 8 8	48988	33376	157227	8468	80/0/8	96967	49960	2000	7417	505	9166	71359	25084	476934	118671	1997	8 5	41489	*****
vnerican Wa komestic Pro	2000	9816959	98019	71526	12.5	989	26992	13353	1882	479694	365268	31437	45743	48193	121886	9	20580	118105	64439	32712	57515	260950	25.50	3 5	100	49009	26248	157057	667.28	591688	301622	57678	25530		14.57	87.18	70225	24971	458304	116733	32325	FUEL/2	37.740	300
Missouri A	1999	9288410	93778	68774	SPECIAL PROPERTY.	(721)	27492	10688	188417		820352	31830	45103	47303		8	48196	115397	85	30865	52480	362720	153567	2 2	953	45153	22388	157142	66100	27768	287410	54888	24068	6413	1440	25	64750	23209	439313	18664	7010E		4704703	Administration of the
Missouri American Water Company Percent Change in Gross Domesiic Product for the Years 1985 - 2007	1998	8746897	102395	78901	100	25173	27031	12581	180806	14567	806865	28358	42327	5272	112705	7/4/1	47.55	108827	#83	2840	49902	536585	137539	27127	75,75	46508	30843	153362	63603	542939	2/3/04	52501	24531	5518	13777	9245	59852	21085	381573	99996	25288		23847	2500
																	spenous	Loseds					ð												fallon		lies			·	iustries		2. (engine	
	Industry Title	Value added (Millions of dollars) VA Gross domestic product	Provide expusiones Agriculture, forestry, fishing, and hunfing	Flering	Porasty, taking, and related activities	Off and one extraction	Mining, except all and gas	Support activities for minary	Utilifes	Construction	Durable coods	Whool products	Nonmetallic mineral products	Primary metals	Patricaled metal products	Macranery	Computer are interconner products Rechical are incorned, are idented and or	Motor vehicles, bodies and trailers, and parts	Other fransportation equipment	Further and related products	Miscellaneous manufacturing	Nondurable goods	Food and beverage and tobacco product	Textile mile and textile product miles	Appeted and posters and about products. Paper products	Printing and related support activities	Petroleum and cost products	Chemical products	Plastics and rubber products	Wholesale trade	Transportation and warehousing	Air transportation	Reil transportation	Water transportation	Transit and cround passenger transportation	Pipeline transportation	Other transportation and support activities	Warnhousing and storage	Information	Publishing industries (includes software	Motos picture and sound recording (no		INCOTTRECO And date processing services	בתוקונית, אופנה פניניק, וספר ספוניק, נסוישה, שייני
	8	* ×	\$ \$	\$:	> 5	\$ \$	\$	\$	\$	>	\$ \$	\$	\$	≶	≶ :	\$:	\$ \$	\$	\$	\$	≶	\$	≸:	≸ \$	\$ \$	\$	\$	\$	\$	≸ \$	\$	\$	≶:	≶\$	\$	\$	\$	≸	≸:	≶ :	≶:	≸ :	≸ \$	Ş

		Misseuri Anterican Water Company Percent Chance in Grass Domestic Product for the Years 1999 - 2007	Missouri A	omestic Pro	er Company and for the Y	ears 1996 - 2	400						
8	Industry Title	1996	1989	900	2007	2002	2003	2002	2002	2006	2007	ZA-90.	10,-96
Value	Value added (Millions of dollars)											×	gto %
≸ \$	Finance and insurance	641118	679842	740489	782627	822728	864623	907883	982497	1093733	1113599	1.82%	6.33%
\$ ≶	Sacurities, commodiv contracts, and investments	134070	139930	187713	2000	148707	CTUCH (45987)	150766	/6000 /6000				
≸	Insurance carriers and related activities	217437	216867	238264	234383	237438	254999	267747	784457	280082			
\$	Funds, trusts, and other finencial vehicles	11859	15038	15487	17866	95	18723	24077	28146	25.55			
≸	Resi estate and rental and leasing	1043490	1118556	1190463	1276571	1319162	1373895	1470887	1568456	1662826	1747134	5.07%	5.89%
≶ :	Next estate	950298	1017949	1082118	1 (8969)	1215893	1274230	1366737	1461295	1557072			
≸ :	Rental and leasing services and lessons of intengible assets	33155	100608	108345	106872	103269	105765	104149	505160	105754			
\$ \$	Professional and business services	976168	1084543	1140848	1,65880	1188985	1248930	338180	463237	1560905	1684211	7.90%	6.25%
5	Legal services	120891	27.45	128125	020000	/2767 (47767)	6 5 5	50/75/	818168	2000	1003077	3.40% 3.40%	
\$	Computer systems design and related services	92862	107792	12574	127084	127.23	124333	126870	132959	146483			
\$	Miscellaneous professional, scientific, and technical assvices	351555	378798	413251	426198	432152	454580	497095	542540	592054			
\$		158810	12458 82458	45058	177536	183799	195.572	210146	234882	242085	261705	8,10%	
≸ :	Administrative and waste management services	254047	280150	282373	289419	289958	320303	335335	356435	383477	419429	6,60%	5.73%
≸ :	Administrative and support services	231877	255427	25/20/	284073	27,2262	290899	304336	334397	358294			
\$ \$	Waste management and remediation services	22	25	<u>88</u>	¥	28706	2	8608	32039	34183	!		
\$ \$	CONCREMENTAL WATER, COMBIT CATE, AND SECURI ASSESSANCE	501557		578436	738327	799568	857265	916268	961534	1022312	1090737	6.69%	6.84%
\$ \$		* O	17/1	25.58	5000	93200	100086	106296	113940	120946	129411	7.00%	7.48%
\$	Ambulatory health care services	276083	20,000	/RLEAC		764900	75/ 169	201872	47.09	901366	961326	8.85%	6.75%
\$	Horzebak and nursing and residential care facilities	214539	225568	238552	258044	281143	30000	330483	SANAK.	260240			
ş	Social assistance	43282	47583	23022	58083	7828	67841	70628	74026	78578			
\$	Arts, enterfainment, recreation, accommodation, and food services	305873	27.74	350119	361469	381505	398862	427462	448420	479828	505676	5.30%	
\$	Arts, entertalmment, and recreation	76624	83801	929	95554	102390	107188	113744	117448	126182	131132	3,92%	6.12%
\$	Performing arts, specialar sports, museums, and related activities	34634	3/15/	40012	42695	46731	48577	52713	55013	60390			
≸ :	Antesements, gambling, and recreation industries	42191	4504 4404	48864	52969	55659	57811	6103 1	62434	85792			
≸ ;	Accommodation and food services	229148	243973	261443	265805	279115	291674	313718	330972	353643	374545	5.91%	5,61%
\$ \$	Constitutionalism and diminism obsessed	18072	3	306/2	87457	918	90692	98428	105123	112358			
\$	Other carries are an annual process	20101	200	17077	1/0.10	CLOCK	200962	000012		241285			
\$	Government	1094496	1141217	120061	1253729	170707	1418473	1404629	4668746	301103	376073	141.U	4,510%
*	Federal	116235	361860	378749	385701	417.25	448589	73054	500837	526.427	547052	3.00%	4996
≸	General government	283058	300904	315362	325665	352873	383834	412592	438912	458598	1		
≸ :	Government enterprises	59853	99999	63387	80038	64452	64855	86762	63725	67829			
S 5		741585	/588//	823023	672623	221107	963844	1012274	1096079	1122835	1193947	6.32%	5.43%
\$ \$		677722	11796	57.28	800768	848938	886175	835844	987012	1042915			
\$ 3		64363	6/362	92.59	1854	72169	73668	76430	78068	80020			
\$	NPA reconsistion tem //	:	•	•		•	1		3741	-10717	344		
\$	Gross demestic product. NIPAs								#002576+	00070707	42844320	700	
≸	Less: Value added, all industries		: ;						12430167	13205405	13846780	4,30%	
\$	Equate: NIPA reconditation than //	;	·						3741	-10717	44	-67.89%	
*	Private goods-produzing industries /3/	1895417	1958889	2081485	2027496	2035883	2113266	2280603	2448205	2567538	2615550	1.87%	76F4
≶:	Private services-producing industries ///	5757084	6168304	9532802	6842155	7094276	7429072	7913670	8415248	80588508	9488231	5.58%	2.7.3
\$	Infortration-contrations-technology-producing industries /5/	385038	425942	465786	424164	416624	421198	440488	470110	504964	541732	7.28%	3.87%

Missouri American Water Company

Derivation of Investment Risk Adjustment Based upon Ibbotson Associates' Size Premie for the Decile Portoliss of the NYSE/AMEXNASDA

		₩		ΝI		(n)		41
	Ĭ	Market Capitalization (1) (millions) (times fa	ization (1) (times targer)	Applicable Decile of the NYSE/AMEX/ NASDAQ	·	Applicable Size Premium		Spread from Applicable Size Premium for (2)
Missouri American Water Company								
a. Bassel Upon MoPSC Staff Witness Barnes' Four Comparable Water Utility Companies	49	629.331		ගා : හා	ପ୍ର	2.38%	€	
b. Based Upon the MIEC Witness Janous' Water Proxy Group	**	617.772		8-8	<u>ම</u>	2.38%	€	
Based Upon the MIEC Witness Janous' Gas Distribution Proxy Group	₩	561.730		8-8	ම	2.38%	€	
MoPSC Staff Witness Barnes' Four Comparable Water Utility Companies	w	1,009.827	6. X	7-8	6	1.85%	<u>©</u>	0.53%
MIEC Witness Janous' Water Proxy Group	S	620.245	1.0 ×	6- 87	ε	2.38%	€	%00'0
MIEC Witness Janous' Gas Distribution Proxy Group	4	1,645.486	29 x	ω	9	1.60%	9	0.78%
	1	Decle	Number of Companies (millions)	Recent Total Market Capitafization (millions)		Recent Average Market Capitalization (millions)		Size Premium (Return in Excess of CAPN) (2)
	1-E	1 - Largest 2	167 174	\$ 10,357,817.750		\$ 62,022.861 13,375.586		-0.34%
	w 4		197 184	1,111,672,200 709,696,510		5,789.959 3,857.047		0.76%
	S.		203	541,399.790		2,666.994		1.47%
	40		151	411,039,580		1,637.608		160%
	~ 00		5/7 380 380	291,182,590		766.270		2.20%
	Ø		641	284,538.240		443.897		2.56%
	ង់	10 - Smallest	1775	201,705.150		113.637		5.82%

Missouri American Water Company Derivation of Investment Risk Adjustment Based upon Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE

Notes:

- (1) From page 3 of this Schedule.
- (2) Line No. 1a Column 4 Line No. 2 Column 4 and Line No. 1b Line No. 3 of Column 4 etc. For example, the 0.53% in Column 5, Line No. 2 is derived as follows 0.53% = 2.38% 1.85%.
- (3) With an estimated market capitalization of \$629.331 million based upon MoPSC Witness Barnes' four comparable water utility companies, \$617.772 million based upon MIEC Witness Janous' water proxy group, and \$561.730 based upon MIEC Witness Janous' gas distribution proxy group, Missouri American Water Company falls between the 8th and 9th deciles of the NYSE/AMEX/NASDAQ which have an average market capitalization of \$605.084 as shown in the table on the bottom half of page 1 of this Schedule.
- (4) Average size premium applicable to the 8th and 9th deciles of the NYSE/AMEX/NASDAQ as shown in the table on the bottom half of page 1 of this Schedule.
- (5) With an estimated market capitalization of \$1,009.827 million, the based upon MoPSC Witness Barnes' four comparable water utility companies falls between the 7th and 8th deciles of the NYSE/AMEX/NASDAQ which have an average capitalization of \$1,073.072 million as can be gleaned from the information shown in the table on the bottom half of page 1 of this Schedule.
- (6) Average size premium applicable to the 7th and 8th deciles of the NYSE/AMEX/NASDAQ as can be gleaned from the information shown in the table on the bottom half of page 1 of this Schedule.
- (7) With an estimated market capitalization of \$620.245 million, MIEC Witness Janous' water proxy group falls between the 8th and 9th deciles of the NYSE/AMEX/NASDAQ which have an average market capitalization of \$605.084 million as can be gleaned from the information shown in the table on the bottom half of page 1 of this Schedule.
- (8) With an estimated market capitalization of \$1,645.486 million, MIEC Witness Janous' gas distribution proxy group falls in the 6th decile of the NYSE/AMEX/NASDAQ which has an average market capitalization of \$1,637.608 million as shown in the table on the bottom half of page 1 of this Schedule.
- (9) Size premium applicable to the of the 6th and 7th deciles of the NYSE/AMEX/NASDAQ as can be gleaned from the information shown on page 3 of this Schedule.

al		£	E	(11)	** V3 W S	~ I	onnnaard	۰l	0 → 0 0 0 − 0	- nd =1
Merket CeptelZgiton (4) (militara)		(C) 188.823	617.772 (9)	5.75	607.961 2,417.075 772.826 241,448	1,000,827	2246.70 2246.122 2202.22 2302.23 231.04 247.541	620,246	2,054.136 2,444.571 864.108 1,372.808 1,827.785 5,204.897 1,898.512	1,721,271,712,712,712,712,712,712,712,71
ð		۰l	4	~ 	ø	.,	•	4	•	ام ام
Merket-to-Book Retto (3)		207.6 % (6)	203.8 % (8)	2 (10) % (18)	2012 2478 2004 1813	207.6 %	28.19 28.89 188.9 2005 2005 173.6 152.5 250.3	203.6 %	188 6 2017 2018 2018 2018 2018 2018 2018	174.4 174.4 186.3 %
Cosing Stock Market Price (2)	AN				\$ 35.283 18.118 37.396 18.228	\$ 27.257	34,630 16,630 34,260 24,260 16,060 10,400 14,850	\$ 22,928	5 34.740 27.190 38.820 38.820 46.850 26.830 26.830	37.870 34.690 \$ 35.012
Total Common Equity of December 31, 2007 (millions)	303,146 (5)				302,129 970,298 385,708 133,178	446.329	302, 126 876, 236 305, 706 100, 036 155, 178 236, 334 156, 736 61, 272	295.044	1,661,000 2,032,463 428,325 644,797 944,731 878,374	481,080 982,873 980,767 982,045
F -	۳				•	**	17	4	10)	+-
Book Value per Share at December 31, 2007 (1)	ş				17.534 7.319 18.064 10.054	13,393	17.534 7.319 18.084 11.849 12.903 8.589	1.38	21.741 22.507 19.748 16.788 22.525 11.657	16.249 22.980 19.657
S PE					••	v,	"	69	*	
Common Stock Shares Oxolonging at December 31,2007 (millions)	\$				17.231 133.400 20.288 13.346	46,136	17.231 23.400 20.688 2.377 8.377 8.377 11.248 11.248	30.764	78. 460 80. 807 21.546 45.121 45.120 25.467 74.204	45,75 46,75
Company	Mercuri American Weter Company	Based Upon MePSC Staff Witness Barnes' Four Comparable White (Ritty Companies	Based Upon the MISC Witness Janous' Water Proxy Group	Bessel Upon the MREC Witness Janous' Gas Distillition Proxy Group	Based Upon McPSC Staff Withers Benner - Benner Commented Wither URING Conception - American Staffs White Co. - Aqua America, Inc. - Aqua America, Inc. - Badforms Water Sannies Goup - Middlesen Yahar Company	Average	HIEC Withers Januar Weier Proof Oppor American States Water Co., California Weier Service Group California Weier Service Group Middlesser Weier Conspany Southerst Weier Company York Weier Company	Average	MEC Witness January Gas Obstructura Prancy Group Artic Resources, Inc. Artic Energy Co. Co., Landel Group, Inc. Landel Group, Inc. NICOR Inc. NICOR Water Section Gas Company Parametric Natural Gas Cox, Inc.	South Jarray Inclaints, Inc. Southwest Gas Corporation WGL Holdings for. Average

A * Not Available

Votez: (1) Column 3 / Column 1. (2) The closing market prices for th

(2) The dosing market prices for (3) Colomn 4 | Colomn 2.

(a) Column 5 Column 2. (4) Column 5 Column 3. (5) Company Provided. y in ministratorous has unassold numeric waste, uniquely to assume the equal to be sensing transfer-poor motor to the merces, outs' vermes Barrad's during the sension to the sension to the sension of the sension to t

(9) Alterent American Witter Company's common stock, if traded, would trade at a mixed-to-book ratio equal to the everage market-to-book ratio of tha million Visionary absents when they group, 200,8%, and Missouri American Water Company's market explaided ton would therefore have been 2617,772 million, 15617,77 a 2010, 448 * 200,8%.

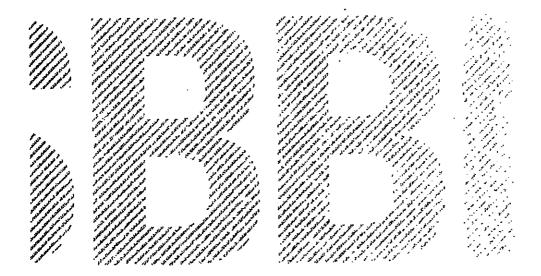
million, (2017) = 5 state (2017) = 5 sta

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Exhibit No. ___ Schedule PMA-20 Page 4 of 16

Ibbotson° SBBI° 2008 Valuation Yearbook

Market Results for Stocks, Bonds, Bills, and Inflation 1926–2007





Chapter 7

Firm Size and Return

The Firm Size Phenomenon

One of the most remarkable discoveries of modern finance is that of a relationship between firm size and return. The relationship cuts across the entire size spectrum but is most evident among smaller companies, which have higher returns on average than larger ones. Many studies have looked at the effect of firm size on return. In this chapter, the returns across the entire range of firm size are examined.

Construction of the Decile Portfolios

The portfolios used in this chapter are those created by the Center for Research in Security Prices (CRSP) at the University of Chicago's Graduate School of Business. CRSP has refined the methodology of creating size-based portfolios and has applied this methodology to the entire universe of NYSE/AMEX/NASDAQ-listed securities going back to 1926.

The New York Stock Exchange universe excludes closed-end mutual funds, preferred stocks, real estate investment trusts, foreign stocks, American Depository Receipts, unit investment trusts, and Americus Trusts. All companies on the NYSE are ranked by the combined market capitalization of their eligible equity securities. The companies are then split into ro equally populated groups, or deciles. Eligible companies traded on the American Stock Exchange (AMEX) and the Nasdaq National Market (NASDAQ) are then assigned to the appropriate deciles according to their capitalization in relation to the NYSE breakpoints. The portfolios are rebalanced, using closing prices for the last trading day of March, June, September, and December. Securities added during the quarter are assigned to the appropriate portfolio when two consecutive month-end prices are available. If the final NYSE price of a security that becomes delisted is a month-end price, then that month's return is included in the quarterly return of the security's portfolio. When a month-end NYSE price is missing, the month-end value of the security is derived from merger terms, quotations on regional exchanges, and other sources. If a month-end value still is not determined, the last available daily price is used.

Base security returns are monthly holding period returns. All distributions are added to the monthend prices, and appropriate price adjustments are made to account for stock splits and dividends. The return on a portfolio for one month is calculated as the weighted average of the returns for its individual stocks. Annual portfolio returns are calculated by compounding the monthly portfolio returns.

Size of the Deciles

Table 7-1 reveals that the top three deciles of the NYSE/AMEX/NASDAQ account for most of the total market value of its stocks. Nearly two-thirds of the market value is represented by the first decile, which currently consists of 167 stocks, while the smallest decile accounts for just over one percent of the

¹ Rolf W. Banz was the first to document this phenomenon. See Banz, Rolf W. "The Relationship Between Returns and Market Value of Common Stocks," Journal of Financial Economics, Vol. 9, 1981, pp. 3-18.

market value. The data in the second column of Table 7-1 are averages across all 82 years. Of course, the proportion of market value represented by the various deciles varies from year to year.

Columns three and four give recent figures on the number of companies and their market capitalization, presenting a snapshot of the structure of the deciles near the end of 2007.

Table 7-1*
Size-Decite Portfolios of the NYSE/AMEX/NASDAQ Size and Composition 1926 through September 30, 2007

Dacile	Historical Average Percentage of Total Capitalization	Recent Number of Companies	Recent Decile Werket Capitalization (in thousends)	Recent Percentage of Total Capitalization
1-largest	63,22%	167	\$10,357,817,750	62.34%
2	13.97%	174	2,327,351,920	14.01%
3	7.58%	192	1,111,672,200	8.69%
4	4.73%	184	709,696,610	4.27%
5	3.24%	203	541,399,790	3.26%
6	2.38%	251	411,039,680	2.47%
7	1.75%	275	379,485,160	2.28%
В	1.30%	390	291,182,590	1.75%
B	1.02%	641	284,538,240	1.71%
10-Smallest	0.83%	1775	201,705,150	1.21%
Mid-Cap 3-5	15.53%	579	2,362,768,280	14.22%
Low-Cap 6-8	5.43%	906	1,081,687,170	6.51%
Micro-Cap 9-10	1.85%	2,416	486,243,740	2.93%

Historical average percentage of total capitalization shows the average, over the last 82 years, of the decile market values as a percentage of the total NYSE/AMEX/NASDAO calculated each month. Number of companies in deciles, recent market capitalization of deciles, and recent percentage of total capitalization are as of September 30, 2007.

Table 7-2 gives the current breakpoints that define the composition of the NYSE/AMEX/NASDAQ size deciles. The largest company and its market capitalization are presented for each decile. Table 7-3 shows the historical breakpoints for each of the three size groupings presented throughout this chapter. Mid-cap stocks are defined here as the aggregate of deciles 3-5. Based on the most recent data (Table 7-2), companies within this mid-cap range have market capitalizations at or below \$9,206,713,000 but greater than \$2,411,794,000. Low-cap stocks include deciles 6-8 and currently include all companies in the NYSE/AMEX/NASDAQ with market capitalizations at or below \$2,411,794,000 but greater than \$723,258,000. Micro-cap stocks include deciles 9-10 and include companies with market capitalizations at or below \$723,258,000. The market capitalization of the smallest company included in the micro-capitalization group is currently \$1,922,000.

[‡] Source: @200801 CRSP*, Center for Research in Security Prices. Graduate School of Business, The University of Chicago used with permission. All rights reserved. www.crsp.chicagogsb.edu

Table 7-2'
Size-Decile Portfolios of the NYSE/AMEX/NASDAO, Largest Company and its Market Capitalization by Decile
September 30, 2007

Decile	Market Capitalization of Largest Company (in thousands)	Company Name
1-Largest	\$472,518,672	Exxon Mobil Corp.
2	20,234,526	General Mills Inc
3	9,206,713	Reliant Energy Inc.
4	5,012,577	Manitowoc Co. Inc.
6	3,422,743	FMC Corp.
	2,411,794	Webster Financial Corp.
7	1,633,320	Simpson Manufacturing Co. Inc.
8	1,129,765	Metal Management Inc.
9	723,258	Citadal Broadcasting Corp.
10-Smallest	363,479	Emergency Medical Services Corp

Presentation of the Decile Data

Summary statistics of annual returns of the 10 deciles over 1926-2007 are presented in Table 7-4. Note from this exhibit that both the average return and the total risk, or standard deviation of annual returns, tend to increase as one moves from the largest decile to the smallest. Furthermore, the serial correlations of returns are near zero for all but the smallest deciles. Serial correlations and their significance will be discussed in detail later in this chapter.

Graph 7-x depicts the growth of one dollar invested in each of three NYSE/AMEX/NASDAQ groups broken down into mid-cap, low-cap, and micro-cap stocks. The index value of the entire NYSE/AMEX/NASDAQ is also included. All returns presented are value-weighted based on the market capitalizations of the deciles contained in each subgroup. The sheer magnitude of the size effect in some years is noteworthy. While the largest stocks actually declined 9 percent in 1977, the smallest stocks rose more than 20 percent. A more extreme case occurred in the depression-recovery year of 1933, when the difference between the first and tenth decile returns was far more substantial, with the largest stocks rising 46 percent, and the smallest stocks rising 218 percent. This divergence in the performance of small and large company stocks is a common occurrence.

Chapter 7

Table 7-3
Size-Decile Portfolios of the NYSE/AMEX/NASDAQ
Largest and Smallest Company by Size Group

from 1926 to 1965

•	Capitalla	ation of Largest (In thousands)	Company	Capitaliza	tion of Smalles (in thousands)	
Date (Sept 30)	Mid-Cop 3-5	Low-Cap 6-8	Micro-Cap 9-10	Mid-Cop 3-5	Low-Cap 6-8	Micro-Cap 9-10
1926	\$60,103	\$13,795	\$4,213	\$13,800	\$4,263	\$43
1927	\$64,820	\$14,491	\$4,415	\$14,522	\$4,450	\$65
1928	\$80,910	\$18,761	\$5,074	\$18,788	\$5,119	\$135
1929	\$103,054	\$24,328	\$5,862	\$24,480	\$5,873	\$178
1930	\$66,750	\$12,818	\$3,359	\$13,050	\$3,368	\$30
1931	\$42,607	\$8,142	\$1,927	\$8,222	\$1,844	\$15
1932	\$12,212	\$2,208	\$468	\$2,223	\$469	\$19
1933	\$40,298	\$7,210	\$1,830	\$7,280	\$1,875	\$120
1934	\$38,019	\$6,638	\$1,873	\$8,669	\$1,691	\$69
1935	\$37,831	\$6,549	\$1,350	\$6,605	\$1,383	\$38
1936	\$45,883	\$11,505	\$2,754	\$11,526	\$2,800	\$98
1937	\$51,750	\$13,835	\$3,539	\$13,793	\$3,563	\$68
1938	\$35,019	\$8,372	\$2,195	\$8,400	\$2,200	\$60
1939	\$35,409	\$7,478	\$1,819	\$7,500	\$1,854	\$75
1840	\$29,903	\$7,990	\$1,661	\$8,007	\$1,872	\$51
1941	\$30,382	\$8,316	\$2,088	\$8,336	\$2,087	\$72
1942	\$26,037	\$6,868	\$1,770	\$6,870	\$1,778	\$82
1943	\$42,721	\$11,403	\$3,847	\$11,475	\$3,903	\$395
1944	\$46,221	\$13,086	\$4,812	\$13,068	\$4,820	\$309
1945	\$55,125	\$17,325	\$6,413	\$17,575	\$6,428	\$225
1946	\$77,784	\$24,192	\$10,149	\$24,199	\$10,168	\$829
1947	\$57,830	\$17,719	\$6,373	\$17,735	\$6,380	\$508
1948	\$67,238	\$19,632	\$7,329	\$19,651	\$7,348	\$683
1949	\$56,082	\$14,549	\$5,037	\$14,577	\$5,108	\$378
1950	\$66,143	\$18,675	\$8,225	\$18,700	\$6,243	\$303
1951	\$82,517	\$22,750	\$7,598	\$22,860	\$7,600	\$668
1952	\$95,636	\$25,405	\$8,428	\$25,452	\$8,480	\$480
1953	\$98,218	\$26,340	\$8,156	\$25,374	\$8,168	\$459
1954	\$125,834	\$29,707	\$8,488	\$29,781	\$8,502	\$483
1955	\$170,829	\$41,445	\$12,368	\$41,681	\$12,444	\$553
1956	\$183,792	\$48,805	\$13,524	\$46,686	\$13,623	\$1,122
1957	\$194,300	\$47,658	\$13,844	\$48,509	\$13,848	\$925
1958	\$195,538	\$46,774	\$13,789	\$46,871	\$13,816	\$550
1959	\$256,283	\$64,110	\$19,548	\$64,221	\$19,701	\$1,804
1980	\$252,292	\$81,485	\$19,293	\$61,529	\$19,344	\$831
1981	\$298.281	\$77,983	\$23,562	\$77,996	\$23,613	\$2,455
1962	\$250,786	\$58,785	\$18,952	\$58,866	\$18,968	\$1,018
1963	\$308,903	\$71,846	\$23,927	\$71,971	\$24,056	\$296
1964	\$349,875	\$79,508	\$25,595	\$79,937	\$25,607	\$223
1965	\$365,675	\$84,600	\$20,483	\$85,065	\$28,543	\$250

Firm Size and Return

Table 7-3 (continued)
Size-Decile Portfolios of the NYSE/AMEX/NASDAQ
Largest and Smallest Company by Size Group

from 1966 to 2007

	Capitalia	ration of Largest (in thousands)	Company	Capitaliza	tion of Smalles (in thousands)	Company
Date (Sept 30)	Mid-Cap 3-5	Low-Cap 6-8	Micro-Cap 5-10	Mid-Cap 3-5	Low-Cap 6-8	Micro-Cep 9-10
1966	\$403,137	\$99,960	\$34,884	\$100,107	\$34,985	\$361
1967	\$459,438	\$118,988	\$42,188	\$119,635	\$42,237	\$381
1968	\$531,306	\$150.893	\$60,543	\$151,260	\$60,719	\$592
1969	\$ 518,485	\$146,792	\$54,353	\$147,311	\$54,503	\$2,119
1970	\$382,884	\$94,754	\$29,916	\$94,845	\$29,932	\$822
1971	\$551,690	\$147,426	\$45,570	\$147,810	\$45,571	\$865
1972	\$597,181	\$143,835	\$48,728	\$144,283	\$46,757	\$1,031
1973	\$431,354	\$96,699	\$29,352	\$96,710	\$29,430	\$561
1974	\$356,876	\$79,878	\$23,355	\$80,280	\$23,400	\$444
1975	\$477,054	\$102,313	\$30,353	\$103,283	\$30,394	\$540
1976	\$566,298	\$121,717	\$34,864	\$121,992	\$34,901	\$564
1977	\$584,577	\$139,196	\$40,700	\$139,620	\$40,765	\$ 513
1979	\$580,881	\$164,093	\$47,927	\$164,455	\$48,038	\$830
1979	\$666,019	\$177,378	\$61,197	\$177,769	\$51,274	\$948
1980	\$782,195	\$189,312	\$50,496	\$199,315	\$50,544	\$549
1981	\$962,397	\$264,690	\$72,104	\$264,783	\$72,450	\$1,446
1982	\$770,517	\$210,301	\$55,336	\$210,630	\$55,423	\$1,060
1983	\$1,209,911	\$353,889	\$104,382	\$356,238	\$104,588	\$2,025
1984	\$1,075,436	\$315,965	\$91,004	\$316,103	\$ 91,195	\$2,093
1985	\$1,440,438	\$370,224	\$94,875	\$370,729	\$94,887	\$760
1988	\$1,857,621	\$449,015	\$110,617	\$449,482	\$110,953	\$706
1997	\$2,059,143	\$468,948	\$113,419	\$470,662	\$113,430	\$1,277
1988	\$1,957,926	\$421,340	\$94,449	\$421,675	\$94,573	\$698
1989	\$2,145,847	\$480,975	- \$100,285	\$483,623	\$100,384	\$96
1990	\$2,171,217	\$474,065	\$93,750	\$474,477	\$93,790	\$132
1991	\$2,129,863	\$457,958	\$87,586	\$459,853	\$87,733	\$278
1992	\$2,428,671	\$500,327	\$103,352	\$500,346	\$103,500	\$510
1993	\$2,705,192	\$803,588	\$137,105	\$607,449	\$137,137	\$602
1994	\$2,470,244	\$596,059	\$148,104	\$597,975	\$148,216	\$598
1995	\$2,789,938	\$647,210	\$155,388	\$647,253	\$155,532	\$89
1996	\$3,142,657	\$751,316	\$193,001	\$751,680	\$193,016	\$1,043
1997	\$3,484,440	\$813,923	\$228,900	\$814,355	\$229,058	\$585
1998	\$4,218,707	\$925,688	\$252,553	\$926,215	\$253,031	\$1,871
1999	\$4,251,741	\$875,309	\$220,397	\$675,582	\$220,456	\$1,502
2000	\$4,143,902	\$840,000	\$192,0 9 3	\$840,730	\$192,439	\$1,393
2001	\$5,156,315	\$1,108,224	\$265,734	\$1,109,969	\$265,738	\$443
2002	\$4,930,328	\$1,116,525	\$308,980	\$1,124,331	\$309,245	\$501
2003	\$4,744,580	\$1,163,369	\$329,060	\$1,183,423	\$329,529	\$332
2004	\$6,241,953	\$1,607,854	\$505,437	\$1,607,931	\$506,410	\$1,393
2005	\$7,187,244	\$1,728,888	\$588,393	\$1,729,364	\$587,243	\$1,079
2008	\$7,777,183	\$1,946,588	\$626,955	\$1,947,240	\$827,017	\$2,247
2007	\$9,206,713	\$2,411,794	\$723,258	\$2,413,583	\$725,267	\$1,927

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Table 7-4*
Size-Decile Portfolios of the NYSE/AMEX/NASDAQ, Summary Statistics of Annual Returns
1928—2007

Decile	Geometric Mean	Arithmetic Mean	Standard Deviation	Serial Correlation
1-Largest	9.6	11.3	18.91	0.08
2	10.9	13 2	21.82	0.04
3	11.3	13.7	23.31	-0.03
4	11.1	14.1	25.68	-0.01
5	11.7	14.8	26.49	-0.02
6	11.7	15.1	27.10	0 03
7	11.8	15.5	29.47	0.01
8	11.8	16.6	34.18	0.05
9	11.9	17.3	36.45	0.04
10-Smallest	13.6	21.0	44.5B	0.16
Mid-Cap, 3-5	11.3	14.0	24.42	-0.02
Low-Cap, 5-8	31.7	15.6	29.03	0.03
Micro-Cap, 9-10	12.5	18.5	38.84	0.08
NYSE/AMEX/NASDAQ Total Value-Weighted Index	10.1	12 0	19 94	0.03

Aspects of the Firm Size Effect

The firm size phenomenon is remarkable in several ways. First, the greater risk of small stocks does not, in the context of the capital asset pricing model (CAPM), fully account for their higher returns over the long term. In the CAPM only systematic, or beta risk, is rewarded; small company stocks have had returns in excess of those implied by their betas.

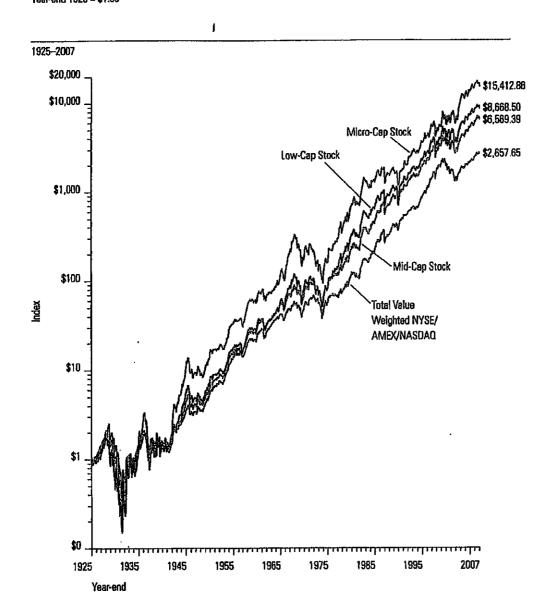
Second, the calendar annual return differences between small and large companies are serially correlated. This suggests that past annual returns may be of some value in predicting future annual returns. Such serial correlation, or autocorrelation, is practically unknown in the market for large stocks and in most other equity markets but is evident in the size premia.

Third, the firm size effect is seasonal. For example, small company stocks outperformed large company stocks in the month of January in a large majority of the years. Such predictability is surprising and suspicious in light of modern capital market theory. These three aspects of the firm size effect—long-term returns in excess of systematic risk, serial correlation, and seasonality—will be analyzed thoroughly in the following sections.

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Firm Size and Return

Graph 7-1*
Size-Decile Portfolios of the NYSE/AMEX/NASDAQ: Wealth Indices of Investments in Mid-, Low-, Micro- and Total Capitalization Stocks
Year-end 1925 = \$1.00



Long-Term Returns in Excess of Systematic Risk

The capital asset pricing model (CAPM) does not fully account for the higher returns of small company stocks. Table 7-5 shows the returns in excess of systematic risk over the past 82 years for each decile of the NYSE/AMEX/NASDAQ. Recall that the CAPM is expressed as follows:

$$k_i = r_i + (\beta_i \times ERP)$$

Table 7-5 uses the CAPM to estimate the return in excess of the riskless rate and compares this estimate to historical performance. According to the CAPM, the expected return on a security should consist of the riskless rate plus an additional return to compensate for the systematic risk of the security. The return in excess of the riskless rate is estimated in the context of the CAPM by multiplying the equity risk premium by β (beta). The equity risk premium is the return that compensates investors for taking on risk equal to the risk of the market as a whole (systematic risk). Beta measures the extent to which a security or portfolio is exposed to systematic risk. The beta of each decile indicates the degree to which the decile's return moves with that of the overall market.

A beta greater than one indicates that the security or portfolio has greater systematic risk than the market; according to the CAPM equation, investors are compensated for taking on this additional risk. Yet, Table 7-5 illustrates that the smaller deciles have had returns that are not fully explained by their higher betas. This return in excess of that predicted by CAPM increases as one moves from the largest companies in decile 1 to the smallest in decile 20. The excess return is especially pronounced for microcap stocks (deciles 9-10). This size-related phenomenon has prompted a revision to the CAPM, which includes a size premium. Chapter 4 presents this modified CAPM theory and its application in more detail.

This phenomenon can also be viewed graphically, as depicted in the Graph 7-2. The security market line is based on the pure CAPM without adjustment for the size premium. Based on the risk (or beta) of a security, the expected return lies on the security market line. However, the actual historic returns for the smaller deciles of the NYSE/AMEX/NASDAQ lie above the line, indicating that these deciles have had returns in excess of that which is appropriate for their systematic risk.

^{2.} The equity risk premium is estimated by the 82-year arithmetic mean return on large company stocks, x2.26 percent, less the 82-year arithmetic mean income-return component of 20-year government bonds as the historical riskless rate, in this case 5.2x percent. (It is appropriate, however, to match the maturity, or duration, of the riskless asset with the investment horizon.) See Chapter 5 for more detail on equity risk premium estimation.

³ Historical betas were calculated using a simple regression of the monthly portfolio (decile) total returns in excess of the 30-day U.S. Treasury bill total returns versus the 500 total returns in excess of the 30-day U.S. Treasury bill, January 1926-December 2007. See Chapter 6 for more detail on beta estimation.

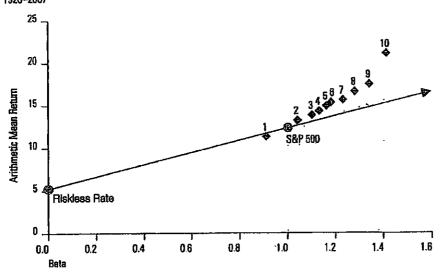
[‡] Source: © 200807 CRSP®, Center for Research in Security Prices. Graduate School of Business, The University of Chicago used with permission. All rights reserved, www.crsp.chicagogsb.edu

Table 7-5°
Long-Term Returns in Excess of CAPM Estimation for Decile Portfolios of the NYSE/AMEX/NASDAQ
1926–2007

Decile	Bela*	Arithmetic Mean Return	Realized Return in Excess of Riskless Rale**	Estimated Return in Excess of Riskless Ratet	Size Premium (Retern in Excess of CAPM)
1-Largest	0.91	11.31%	6.10%	6.45%	-0.34%
2	1 03	13.16%	7.95%	7.27%	0 68%
3	1.10	13 72%	8.51%	7.75%	0.76%
4	1.12	14.07%	8.86%	7.93%	0.93%
5	1 16	14.85%	9.64%	8.17%	1.47%
6	1 18	15 14%	9.93%	B 33%	1 60%
7	1 24	15 46%	10 26%	8.76%	1 50%
8	1.30	16.56%	11.38%	9.16%	2 20%
9	1.35	17.28%	12.07%	9.51%	2.56%
10-Smallest	1.41	20.98%	15.77% -	9.95%	5.62%
Mid-Cap, 3-5	1.12	14 01%	8.81%	7.88%	0.92%
Low-Cap, 6-8	1.22	15.49%	10.29%	8.64%	1.65%
Micro-Cep. 9-10	1.36	18.46%	13.25%	9.59%	3.65%

^{*}Betas are estimated from monthly portfolio total returns in excess of the 30-day U.S. Treasury bill total return versus the S&P 500 total returns in excess of the 30-day U.S. Treasury bill, January 1928—December 2007.

Greph 7-2*
Security Market Line versus Size-Decile Portfolios of the NYSE/AMEX/NASDAQ
1926-2007



^{**}Historical riskless rate is measured by the 82-year arithmetic mean income return component of 20-year government bonds (5.21 percent)

^{**}Calculated in the context of the CAPM by multiplying the equity risk premium by beta. The equity risk premium is estimated by the erithmetic mean total return of the S&P 500 (12 26 percent) minus the arithmetic mean income return component of 20-year government bonds (5 21 percent) from 1928–2007.

Further Analysis of the 10th Decile

The size premia presented thus far do a great deal to explain the return due solely to size in publicly traded companies. However, by splitting the roth decile into two size groupings we can get a closer look at the smallest companies. This magnification of the smallest companies will demonstrate whether the company size to size premia relationship continues to hold true.

As previously discussed, the method for determining the size groupings for size premia analysis was to take the stocks traded on the NYSE and break them up into 10 deciles, after which stocks traded on the AMEX and NASDAQ were allocated into the same size groupings. This same methodology was used to split the 10th decile into two parts: 10a and 10b, with 10b being the smaller of the two. This is equivalent to breaking the stocks down into 20 size groupings, with portfolios 19 and 20 representing 10a and 10b.

Table 7-7 shows that the pattern continues; as companies get smaller their size premium increases. There is a noticeable increase in size premium from 10a to 10b, which can also be demonstrated visually in Graph 7-3. This can be useful in valuing companies that are extremely small. Table 7-6 presents the size, composition, and breakpoints of deciles 10a and 10b. First, the recent number of companies and total decile market capitalization are presented. Then the largest company and its market capitalization are presented.

Breaking the smallest decile down lowers the significance of the results compared to results for the roth decile taken as a whole, however. The same holds true for comparing the xoth decile with the Micro-Cap aggregation of the 9th and xoth deciles. The more stocks included in a sample the more significance can be placed on the results. While this is not as much of a factor with the recent years of data, these size premia are constructed with data back to 1926. By breaking the xoth decile down into smaller components we have cut the number of stocks included in each grouping. The change over time of the number of stocks included in the xoth decile for the NYSE/AMEX/NASDAQ is presented in Table 7-8. With fewer stocks included in the analysis early on, there is a strong possibility that just a few stocks can dominate the returns for those early years.

While the number of companies included in the 10th decile for the early years of our analysis is low, it is not too low to still draw meaningful results even when broken down into subdivisions 10a and 10b. All things considered, size premia developed for deciles 10a and 10b are significant and can be used in cost of capital analysis. These size premia should greatly enhance the development of cost of capital analysis for very small companies.

Table 7-8¹
Size-Decile Portfolios 10a and 10b of the NYSE/AMEX/NASDAG,
Largest Company and its Market Capitalization
September 30, 2007

Decile	Recent Number of Companies	Recent Decile Market Capitalization (in thousands)	Market Capitalization of Largest Company (In thousands)	Company Nam s
10a	388	108,458,780	363,479	Emergency Medical Services Corp.
10b	1,405	143,681,297	211,590	Milier Industries Inc., Tenn.

Note: These numbers may not aggregate to equal decile 10 figures.

[‡] Source: O200801 CRSP*, Center for Research in Security Prices. Graduate School of Business, The University of Chicago used with permission. All rights reserved. www.crsp.chicagogsb.edu

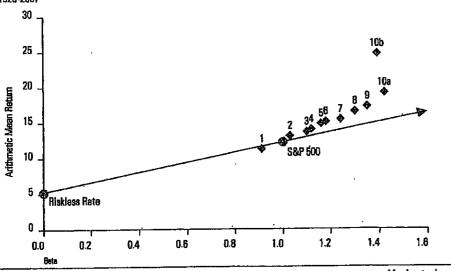
Table 7-7*
Long-Term Returns in Excess of CAPM Estimation for Decile Portfolios of the NYSE/AMEX/NASDAQ, with 10th Decile Split
1926–2007

	Beta*	Arithmetic Mean Return	Realized Return in Excess el Riskloss Rate	Estimated Heturn in Excess of Hiskless Hatet	Size Premium (Return in Excess of CAPM)
1-Largest	0.91	11 31%	6 10%	6.45%	-0.34%
2	1.03	13 16%	7.95%	7.27%	0.68%
3	1.10	13 72%	8.51%	7.75%	0.76%
4	1.12	14.07%	8 86%	7.83%	0.93%
5	1.16	14.85%	9.64%	8.17%	1.47%
6	1.18	15.14%	9.93%	8.33%	1.60%
7	1.24	15.46%	10.26%	8.76%	1.50%
8	1.30	16.58%	11.38%	9.18%	2.20%
9	1.35	17.28%	12.07%	9.51%	2.56%
10a	1.42	19.22%	14.01%	10.02%	3.89%
10b-Smallest	1.39	24.71%	19.50%	9.77%	8.73%
Mid-Cap, 3-5	.1.12	14.01%	8.81%	7.88%	0.92%
Low-Cap, 6-8	1.22	15.49%	10.29%	8.64%	1.65%
Micro-Cap, 9-10	1.36	18.46%	13.25%	9.59%	3.65%

^{*}Betas are estimated from monthly portfolio total returns in excess of the 30-day U.S. Treasury bill total return versus the S&P 500 total returns in excess of the 30-day U.S. Treasury bill, January 1926-December 2007.

tCalculated in the context of the CAPM by multiplying the equity risk premium by bate. The equity risk premium is estimated by the arithmetic mean total rature of the S&P 500 (12.28 percent) minus the arithmetic mean income return component of 20-year government bonds (5.21 percent) from 1926–2007.

Graph 7-3¹ Security Market Line versus Size-Decile Portfolios of the NYSE/AMEX/NASDAQ, with 10th Decile Split 1928-2007



^{**}Historical riskless rate is measured by the 82-year arithmetic mean income return component of 20-year government bonds (5.21 percent).

Table 7-8* Historical Number of Companies for NYSE/AMEX/NASDAQ Decile 10

Sept.	Number of Companies
1926	52'
1930	72
1940	78
1950	100
1960	109
1970	865
1980	685
1990	1,814
200D	1,927
2005	1,746
2006	1,744
2007	1,775

^{*}The fewest number of companies was 49 in March, 1926

Alternative Methods of Calculating the Size Premia

The size premia estimation method presented above makes several assumptions with respect to the market benchmark and the measurement of beta. The impact of these assumptions can best be examined by looking at some alternatives. In this section we will examine the impact on the size premia of using a different market benchmark for estimating the equity risk premia and beta. We will also examine the effect on the size premia study of using sum beta or an annual beta.

Changing the Market Benchmark

In the original size premia study, the sær 500 is used as the market benchmark in the calculation of the realized historical equity risk premium and of each size group's beta. The NYSE total value-weighted index is a common alternative market benchmark used to calculate beta. Table 7-9 uses this market benchmark in the calculation of beta. In order to isolate the size effect, we require an equity risk premium based on a large company stock benchmark. The NYSE deciles 1-2 large company index offers a mutually exclusive set of portfolios for the analysis of the smaller company groups: mid-cap deciles 3-5, low-cap deciles 6-8, and micro-cap deciles 9-10. The size premia analyses using these benchmarks are summarized in Table 7-9 and depicted graphically in Graph 7-4.

For the entire period analyzed, 1926-2007, the betas obtained using the NYSE total value-weighted index are higher than those obtained using the S&P 500. Since smaller companies had higher betas using the NYSE benchmark, one would expect the size premia to shrink. However, as was illustrated in Chapter 5, the equity risk premium calculated using the NYSE deciles 1-2 benchmark results in a value of 6.35, as opposed to 7.05 when using the S&P 500. The effect of the higher betas and lower equity risk premium cancel each other out, and the resulting size premia in Table 7-9 are slightly higher than those resulting from the original study.

- 4 Sum beta is the method of beta estimation described in Chapter 6 that was developed to better account for the lagged reaction of small stocks to market movements. The sum beta methodology was developed for the same reason that the size premia were developed; small company betas were too small to account for all of their excess returns.
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NA

NΑ

NA

NA

NA

10.9 %

12.0

13.0

14.7

8.7

11.8 %

3.3

3.4

3.9 %

Missouri American Water Company Market-to-Book Ratios, Earnings / Book Ratios and Inflation for Standard & Poor's Industrial Index and the Standard & Poor's 500 Composite Index from 1947 through 2007

Marketto-Book Earnings/ Year Ratio (1) Book Ratio (2) S&P 500 S&P 500 S&P Industrial Composite S&P Industriat Composite Earnings / Book Ratio - Net of Inflation Index (3) Index (3) Inflation (4) Index (3) Index (3) 1947 1.23 % 13.0 % 9.0 % NA NA 4.0 % 1948 1.13 17.3 14.6 NA 1949 1.00 NA 16.3 NΑ (1.8)18.1 NA 1950 1.16 NA 18.3 NA 5.8 12.5 NA 1951 1.27 NΑ 5.9 8.5 NA 1952 1.29 NA 12.7 NA 0.9 11.8 NA 1953 1.21 NA 12.7 NA 0.6 12.1 NΑ 1954 1.45 NA 13.5 NΑ (0.5)14.0 NA 1955 1.81 NA 16.0 NΑ 0.4 15.6 NΑ 1956 1.92 NA 13.7 NA 29 10.8 NΑ 1957 1.71 NΑ 12.5 NA 3.0 9.5 NA 1958 1.70 NA 9.8 NA NA NA 1959 1.94 11.2 NA 1.5 9.7 NΑ 1960 1.82 NΑ 10.3 NA 1.5 NA 8.8 1961 2.01 NΑ 9.8 NA NA 1962 1.83 NA 10.9 NA 1.2 1.7 9.7 NA 1963 1.94 NA NA 11.4 9.7 NA 1964 2.18 NΑ 12.3 11.1 NΑ 1985 2 21 NΑ 13.2 NA 1.9 11.3 NΑ NA 1986 2.00 NA 3.4 13.2 9.8 NA 1967 2.05 NΑ 12.1 NA 3.0 NA 9.1 1968 2.17 NA 12.6 NΑ 4.7 7.9 NA 2.10 1969 NΑ 12.1 NA 6.1 6.0 NA 1970 NΑ 10.4 1.71 NΑ NA 5.5 4.9 1971 1.99 NΑ 11.2 NΑ 3.4 NA 1972 NA 2.16 12.0 NA 3.4 8.6 NA 1.96 NΑ NΑ 14.6 8.8 5.8 NA 1974 1.39 NA 14.8 2.6 NA 1975 1.34 NA 12.3 NA 7.0 5.3 NΑ 1976 1.51 NA NA 14.5 4.8 9.7 NA 1977 1.38 NΑ 7.8 6.8 NA 1978 1.25 NA 15.3 NA 9.0 6.3 NA 1979 1.23 NA 17.2 NA 13.3 3.9 NA 1980 1.31 NA NA 12.4 3.2 15.6 NA 1981 1.24 NA 14.9 NA 8.9 6.0 NA 1.17 NA 1982 11.3 NA 3.9 7.4 NA 1983 NΑ 12.2 NΑ 3.8 8.4 NA 1984 1.46 NA 14.6 NA 4.0 10.6 NΑ 1985 1.67 NA 12.2 NA 3.8 8.4 NA 1986 2.02 NA NΑ 11.5 1.1 10.4 NA 1987 2.50 NΑ 15.7 NΑ 11.3 NΑ 1988 4.4 4.7 2.13 NA 19 D NΑ 14.6 NA 1989 2.56 NA NA 18.5 13.8 NA 1990 2.63 NΑ 16.3 NA 6.1 10.2 NA 1991 2.77 NA 10.8 NA 3.1 7.7 NΑ 1992 NA 3.29 13.0 NA 2.9 10.1 NA 1993 3.72 15.7 NA NA 2.8 12.9 1994 3 73 NA 23.0 NA 2.7 20.3 1995 2.64 4.06 22.9 16.0 % 2.5 20.4 13.5 % 1996 4.79 3.00 24.8 16.8 3.3 21.5 13.5 1997 5.88 3.53 24.6 16.3 1.7 22.9 1998 7.13 4.16 21.3 14.5 1.6 19.7 12.9 1999 4.76 25.2 17.1 2.7 22.5 14.4 2000 7.51 4.51 23.9 12.8 20.5 2001 NA 3.50 7.4 1.6 NA 5.8 2002 NA 2.93 NA 6.3 2.4 NA 5.9 2003 NΑ 2.78 1.9 12.2

Notes: (1) Market-to-Book Ratio equals average of the high and low market price for the year divided by the average book value.

(2) Earnings/Book equals earnings per share for the year divided by the average book value

2 91

2.78

2.77

2.75 (5)

3.31 %

(3) On January 2, 2001 Standard & Poor's released Global Industry Classification Standard (GICS) price indexes for all Standard & Poor's U.S. indexes. As a result, all S&P Indexes have been calculated with a common base of 100 at a start date of December 31, 1994. Also, the GICS industrial sector is not comparable to the former S&P industrial index and data for the former S&P industrial index has been discontinued.

15 3

16.4

17.2

12.8

14.5 %

МΔ

NA

NΑ

NA

14.9 %

(4) As measured by the Consumer Price Index (CPI).

NΑ

NA

NA

NΑ

2.34 %

2004

2005

2006

2007

Average

(5) Ratios for 2006 / 2007 are based upon estimated book values using the actual average price and the estimated book value calculated by adding the 2006 earnings per share to the 2005 / 2006 book value per share and then subtracting the 2006 / 2007 dividends per share as provided by Standard & Poor's Statistical Record - Current Statistics, March 2008, p. 29.

Source of Information: Standard & Poor's Security Price Index Record, 2000 Edition, p. 40

Standard & Poor's Statistical Service, Current Statistics, January 2001, p. 36

Standard & Poor's Statistical Service, Current Statistics, June 2006, p. 29.

Standard & Poor's Statistical Service, Current Statistics, August 2007, p. 29.

Standard & Poor's Statistical Service, Current Statistics, March 2008, p. 29.

Standard & Poor's Compustat Services, Inc. PC Plus Research Insight Database Ibbotson Associates, Stocks, Bonds, Bills and Inflation - Valuation Edition 2008 Yearbook, 2008, Table B-15, pp. 256-257.

Missouri American Water Company Indicated Common Equity Cost Rate Through Use of a Risk Premium Model Using an Adjusted Total Market Approach

Line No.		MIEC Witness Janous' Water Proxy Group	The Prxoy Group of MIEC Witness Janous' Ten Gas Distribution Companies
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	5.87 %	5.87 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A Rated Public Utllity Bonds	0.72 (2)	0.72 (2)
3.	Adjusted Prospective Yield on A Rated Public Utility Bonds	6.59 %	6.59 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group	0.00 (3)	<u> </u>
5.	Adjusted Prospective Bond Yield	6.59	6.78
6.	Equity Risk Premium (5)	5.37	5.02
7.	Risk Premium Derived Common Equity Cost Rate	11.96 %	11.80 %

Notes:

- (1) Derived in Note (3) on page 5 of Schedule PMA-20.
- (2) The average yield spread of A rated public utility bonds over Aaa rated corporate bonds of 0.72% from page 3 of this Schedule.
- (3) No adjustment necessary as the average Moody's bond rating of the proxy group is A2 as shown on page 2 of this Schedule.
- (4) Adjustment to reflect the A3 Moody's Bond Rating of the Proxy Group of Ten Gas Distribution Companies. As shown on page 2 of this schedule. The 18 basis point adjustment is derived by taking 1/3 of the spread between Baa and A2 Public Utility Bonds (1/3 * 0.58% = 0.19%)
- (5) From page 4 of this Schedule.

Missouri American Water Company
Comparison of Boof Radings, Butters Risk and Flancial Risk Profiles for
MIEC Witness Janous' Water Proxy Group
and MIEC, Witness Janous' Ges Distribution Proxy Group

	'	ľ	Moody's		į			Standard & Poor's			
	•	Set	September 2008		September 2008	cating er 2008					
	'	Bond Rating	Numerical Weighting (1)	Bond	Numerical Weighting (1)	Credit Rating	Numerical Weighting (1)	Business Risk Profile (2)	Numerical Weldhting (1)	Financial Risk Profile (2)	Namerical Weichting (1)
MIEC Witness Janous' Water Proxy Group											
American States Water Company (3)		2	æ	∢	9	<	9	Excellent		Intermediate	8
Aqua America, Inc. (4)		£ !	:	¥	4	ŧ	'n	Excellent	,	Intermediate	7
Connection Water Services Connection Water Services		žž	: :	A A A	¦ «	ŧ∢	ın «	Excellent	٠- ٠	Intermediate	~ ~
Middlesex Water Company		€	:	*	- 40	(-∤	۰,	Fyrellent	- «-	Information	40
SJW Corporation (6)		¥	;	ž	;	ž	.;	Æ	٠ :	ĸ	• }
Southwest Water Company (7) York Water Company (The)		¥ ¥	: :	£ 4	; ~	ž 4	: ^	NR Proping	} •	NR Infermediate	; 0
	Average	2	6.0	*	8,4	4	9	Excellent	1.0	Intermediate	202
MIEC Witness Janous' Ges											
Distribution Proxy Group											
AGL Resources Inc. (8)		₽,	۲.	¥ i		∢	ω.	Excellent	۲.	Intermediate	۲۵
Atnos Energy Corporation		Band	\$,	888	on t	88.	σ, (Excellent	٠. ،	Aggressive	en (
New Jersey Resources Corp.		₹ 5	-:	< ₹	e va	< 2	o¦	tueneous EN	r- ¦	Intermediate NO	7
Nicor Inc. (9)		4	ĸ	*	· e7	₹	es	Excellent	,	Intermediate	۲,
Northwest Natural Gas Company	•	8	9	ł	۲	₹	4	Excellent	-	Intermediate	1 72
Pledmont Natural Gas Company		2 .	~ '	∢ •	6 9 1	٧.	9	Excellent	-	Intermediate	7
Southwest Gas Corp.		Baa3	o 5	₹ 88	ν (2		so 55	Strang	- °	Aggressive	m m
WGL Holdings, Inc. (13)		8	9	¥	. 4	₹	₹ •	Excellent	. –	Intermediate	. 6
		8	1		;	۱.	5		;		
	L	2	3	«	3	<	28	Cochent	2	Intermediate	22
Notes: (1)	Fют раде 3 о	f Schedule	From page 3 of Schodule PMA-11 accompanying Ms. Ahams' direct bastimony.	Abems' direct	testimony.						
8	From Standard	i & Poor's is Companie	From Standard & Poor's Issuer Ranking: U.S. Investor-Owned Wat Internation Con Companies Standard to Manked Assess 7, 2000	r-Owned Wate	r Utilities, Stronge	st to Weake	st, August 5, 2008	and U.S. Natural Gas	Distributors and		
6	Ratings basin	ese rick and	to cast companies, or or goest to stoomest, rugue, s. 2000. Exsistes risk and financial risk omfiles are those of Golden State Water Company	OSP of Golden	State Water Com	AL PA					
€	Ratings, busin	ess risk and	business risk and financial risk profiles are those of Aqua Pennsylvania, Inc.	ose of Aqua P	ornsylvania, Inc.	ì					
6	Ratings, busin	ess risk end	business risk and financial risk profiles are those of California Water Service Company.	ose of Californ	a Watter Service (Сопрапу.					•
e 6		BESS TIESK AND	Ousmost risk and financial risk profiles are those of San Jose Water Company.	ose of San Jos	is Water Compan	×.	:				
S	CARRIES, INC. S	oss nak and Suburban W	ouzamess tak and imandal rak plontes are a composite of mose of nortsby bend Julity Co., New Medico Inc., Suburban Water Switerns, and Windernere Lifth Co.	composite of the	tose of mornspy a		o., New Mesaco				
9	Ratings, busin	ess risk and	business risk and financial risk profiles are those of Atlanta Gas Light Company.	ose of Atlanta	Gas Light Compa	ž					
: 6 :	Ratings, busin	ess risk and	business risk and financial risk profiles are those of Nicor Gas Company.	ose of Micor G	as Company.	,					
(30)	Ratings, busin	ess risk and	business risk and financial risk are those of Laclade Gas Company.	aclede Gas Co	impany.						
Œ.	Ratings, busin	ess risk and	business risk and financial risk profiles are those of New Jersey Natural Gas Company.	ose of New Je	sey Natural Gas	Company.					
(55) (13)	Ratings, busin Ratings, busin	ess risk and ess risk and	pusiness risk and financial risk profiles are those of South Jersey Gas. business risk and financial risk profiles are those of Washington Gas Light Company.	ose of South J ose of Washin	ersey Gas. gton Gas Light Co	mpany.					

Moody's for the Three Months Ending August 2008 (1)

ا۔		اہ				
presd - Public Utility Bonds		Baa over A				0.58 %
Spread - Pub		A over As				0.24 %
Hility Bonds	Baa (Pub. Util.) over Aaa	(Corp.)				1.30 %
orporate v. Public L	ub. Util.) A (Pub. Util.) Baa (Pub. er Aaa Util.) over Aaa	(Сор.)				0.72 %
Spiread - C	Aa (Pub. Util.) over Aaa	(Согр.)				0.48 %
		Baa Rated	6.93 %	6.97	6.98	% 96.9
	Public Utility Bonds	A Rated	6.38	6.40	6.37	6.38 %
		Aa Rated	6.19	6.13	6.09	6.14 %
	Corporate Bonds	Asa Rated	5,68	5,67	5.64	5.66 %
		Years	June-08	July-08	August-08	Average of Last 3 Months

Notes: (1) All yields are distributed yields.

Source of Information: Mergent Bond Record, September 2008, Vol. 75, No. 9

Missouri American Water Company Judgment of Equity Risk Premium for MIEC Witness Janous' Water Proxy Group and MIEC Witness Janous' Gas Distribution Proxy Group

Line No.		MIEC Witness Jenous' Water Proxy Group	MIEC Witness Janous' Gas Distribution Proxy Group
1.	Calculated equity risk premium based on the total market using the beta approach (1)	6.08	5.39
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A rated bonds (2)	4.65	4.65
3.	Average equity risk premium	5.37 %	5.02 %

- Notes: (1) From page 5 of this Schedule. (2) From page 6 of this Schedule.

Missouri American Weter Company Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for MIEC Witness Janous' Water Proxy Group and MIEC Witness Janous' Gas Distribution Proxy Group

Line <u>No.</u>		MIEC Witness Jenous' Water Proxy Group	MIEC Wilness Janous' Gas Distribution Proxy Group
1.	Arithmetic mean total return rate on the Standard & Poor's 500 Composite Index - 1928-2007 (1)	12.30 %	12.30 %
2.	Arithmetic mean yield on Aaa and Aa Corporate Bonds 1926-2007 (2)	<u>(6.10)</u>	<u>(6.10)</u>
3.	Historical Equity Risk Premium	6.20 %	6.20 %
4.	Forecasted 3-5 year Total Annual Market Return (3)	18.15 %	18.15 %
5.	Prospective Yield an Asa Raled Corporate Bonds (4)	(5.87)	(6,87)
6,	Forecasted Equity Risk Premium	12.28 %	12.28 %
7.	Conclusion of Equity Risk Premium (5)	6.20 %	6.20 %
8.	Adjusted Value Line Beta (6)	0.98	0.87_
9,	Beta Adjusted Equity Risk Premium	6,08_%	5,39 %
loles:	(1) From <u>libbosion SBBI - 2008 Valuation Yearbook - Market</u> <u>inflation for 1926-2007</u> , Momingster, Inc., 2008 Chicago		

No

- (2) From Moody's Industrial Manual and Mergent Bond Record Monthly Update.
- (3) From page 3 of Schedule PMA-23.
- (4) Average forecast based upon six quarterly estimates of Asa rated corporate bonds per the consensus of nearty 50 economists reported in Blue Chip Financial Forecasts dated September 1, 2008 (see page 2 of Schedule 14). The estimates are detailed below.

Third Quarter 2008	5.70	v
Fourth Quarter 2008	5.70	Ĩ
First Quarter 2009	5,80	
Second Quarter 2009	5.90	
Third Quarter 2009	6.00	
Fourth Quarter 2009	6.10	
Average	5.87	4

- (5) The average of the Historical Equity Risk Premium of 8.20% from Line No. 3 and the Forecasted Equity Risk Premium of 12.28% from Line No. 6 ((6.20% + 12.28%) / 2 = 9.24%. Normally, Ms. Ahern would use the average Historical Equity Risk Premium in her Risk Premium Analysis. However, in Ms. Ahern's opinion, the current and recont substantial volatility in the stock market is extraordinary and not representative of the expected long-term. Consequently, in this instance, Ahern will not consider what she believes is an extraordinary expected capital appreciation and instead will rely only upon the 6.20% historical market premium.
- (6) From page 8 of this Schedule.

Schedule PMA-22 Page 6 of 7

Missouri American Water Company Derivation of Mean Equity Risk Premium Based on a Study Using Holding Period Returns of Public Utilities

Line No.		-	Over A Rated Public Utility Bonds AUS Consultants - Utility Services Study (1)
Time Period			1928-2007
1.		Arithmetic Mean Holding Period Returns (2):	
	•	Standard & Poor's Public	
		Utility Index	11.24 %
2.		Arithmetic Mean Yield on:	
		Moody's A Rated Public Utility Bonds	(6.59)
3.		Equity Risk Premium	4.65 %
Notes:	(1)	S&P Public Utility Index and Moody's 1928-2007, (AUS Consultants - Utility	^o ublic Utility Bond Average Annual Yields Services, 2008).
	(2)		pased upon income received (dividends in the market value of a security over a one-

Missouri American Water Company Value Line Adjusted Betas for MIEC Witness Janous' Water Proxy Group and MIEC Witness Janous' Gas Distribution Proxy Group

MIEC Witness Janous' Water Proxy	Value Line Adjusted Beta (1)
American States Water Co.	4.05
· ····································	1.05
Aqua America, Inc.	0.95 1.15
California Water Service Group Connecticut Water Service, Inc.	0.85
Middlesex Water Company	0.85
SJW Corp.	1.15
Southwest Water Company	1.05
York Water Company	0.50
Average	0.98
MIEC Witness Janous' Gas Distribution Proxy Group	
AGL Resources, Inc.	0.85
Atmos Energy Corp.	0.85
Laclede Group, Inc.	0.90
New Jersey Resources Corp.	0.85
NICOR Inc.	0.95
Northwest Natural Gas Company	0.80
Pledmont Natural Gas Co., Inc.	0.85
South Jersey Industries, Inc.	0.85
Southwest Gas Corporation	0.90
WGL Holdings, Inc.	0.90
Average	0.87

⁽¹⁾ From MIEC Witness Janous' Schedule BAJ-11.

Missouri American Water Company Indicated Common Equity Cost Rate Through Use of the Capital Asset Pricing Model for MIEC Witness Janous' Water Proxy Group and MIEC Witness Janous' Gas Distribution Proxy Group

Line		MIEC Witness Janous' Water Proxy Group	MIEC Witness Janous' Gas Distribution Proxy Group

1.	Traditional Capital Asset Pricing Model (1)	11.85 %	11.28 %
2 .	Empirical Capital Asset Pricing Model (1)	<u>11.94</u> %	<u>11.51</u> %
3.	Conclusion	11.90 %	<u>11.40</u> %

Notes: (1) From page 2 of this Schedule.

Missouri American Water Company Indicated Common Equity Cost Rate Through Use of the Capital Asset Pricing Model for MIEC Witness Janous' Water Proxy Group and MIEC Witness Janous' Gas Distribution Proxy Group 1 2

g	and MIEC Witness Janous' Gas Distribution Proxy Group		
	<u>1</u>	2	<u>3</u>
		O	OADIA David
	Value Line	Company-Specific	CAPM Result
		Risk Premium Based on Market Premium of 7,10% (2)	Including Risk-Free Rate of 5.10% (3
	Adjusted Beta (1)		
	Dota (1)	FIGHHAM 01 1, 1079 (2)	7,000 O. 1079 (1
	Traditional Capital Asset Pricing Model (4)		
MIEC Witness Janous' Water Proxy			
Group			
American States Water Co.	1.05	7.46 %	12.58 %
Aqua America, Inc.	0,95	6.75	11,85
California Water Service Group	1,15	8.17	13,27
Connecticut Water Serive Corp.	0.85	6.04	11.14
Middlesex Water Company	0.90	6,39	11,49
SJW Corp.	1.15	8.17	13.27
Southwest Water Company	1.05	7.46	12,66
ork Water Company	0,50	3.55	8.65
Average	0.95	6.75 %	<u>11.85</u> %
MIEC Witness Janous' Gas Distribution			
Proxy Group	0.85	6.04 %	11.14 %
AGL Resources, Inc.	0.85 0,85	6.04 % 6.04	11.14 % 11.14
Atmos Energy Corp.	0.80	6.04 6.39	11.49
aciede Group, Inc.	0.85	6.04	11.14
New Jersey Resources Corp. NICOR Inc.	0.95	6,75	11.85
Northwest Natural Gas Company	0.80	5.68	10.78
Piedmont Natural Gas Co., Inc.	0.85	6.04	11,14
South Jersey industries, Inc.	0.85	6.04	11,14
Southwest Gas Corporation	0.90	6.39	11.49
NGL Holdings, Inc.	0.90	6.39	11.49
- '	0,87		11.28 %
Average	<u> </u>	6.18 %	11,20, 76
	F	Empirical Capital Asset Pricing Model (5)	•
MIEC Witness Janous' Water Proxy Group	<u> </u>		•
American States Water Co.	1.05	7.37 %	12.47 %
Aque Americe, inc.	0.95	6,83	11,93
California Water Service Group	1.15	7.90	13.00
Connecticut Water Serive Corp.	0,85	6.30	11.40
Middlesex Water Company	0.90	8.57	11.67
BJW Corp.	1.15	7,90	13,00
Southwest Water Company	1.05	7.37	12.47
fork Water Company	0.50	<u>4.44</u>	<u>9,54</u>
Average	0,95	6,84 %	11.94 %
·			
AIEC Witness Janous' Gas Distribution	0.05	g ga ai	44.40
GL Resources, Inc.	0,85 0.85	6,30 % 6,30	11.40 11.40
Atmos Energy Corp.		6.57	11.40
aciede Group, Inc.	0,90		
lew Jersey Resources Corp.	0.85 0.95	6.30 6.83	11.40 11.93
IICOR Inc.	0,95	6.04	11.93
lorthwest Natural Gas Company liedmont Natural Gas Co., Inc.	0.80	6.30	11,40
reamont Natural Gas Co., Inc. fouth Jersey Industries, Inc.	0.85	6.30	11,40
iouthwest Gas Corporation	0.90	6.57	11.67
VGL Holdings, Inc.	0.90	6.57	11.67
- ·			
engtevA	n 87	8.41 %	11 51 %

0.87

Average

6.41 %

11.51 %

Missouri American Water Company Development of the Market-Required Rate of Return on Common Equity Using the Capital Asset Pricing Model for MIEC Witness Janous' Water Proxy Group and MIEC Witness Janous' Gas Distribution Proxy Group Adjusted to Reflect a Forecasted Risk-Free Rate and Market Return

Notes:

- (1) From the MIEC Witness Janous' Schedule BAJ-11.
- (2) For reasons explained in Ms. Ahern's accompanying direct testimony, from the three previous monthend (Jun. '08 Aug. '08), as well as a recently available (September 19, 2008), <u>Value Line Summary & Index</u>, a forecasted 3-5 year total annual market return of 18.15% can be derived by averaging the 3-month and spot forecasted total 3-5 year total appreciation, converting it into an annual market appreciation and adding the <u>Value Line</u> average forecasted annual dividend yield.

The 3-5 year average total market appreciation of 80% produces a four-year average annual return of 15.83% ((1.80^{26}) - 1). When the average annual forecasted dividend yield of 2.32% is added, a total average market return of 18.15% (2.32% + 15.83%) is derived.

The 3-month and spot forecasted total market return of 18.15% minus the risk-free rate of 5.10% is 13.05% (18.15% - 5.10%). The Morningstar, inc. (Ibbotson Associates) calculated market premium of 7.10% for the period 1926-2007 results from a total market return of 12.30% less the average income return on long-term U.S. Government Securities of 5.20% (12.30% - 5.20% = 7.10%). This is then averaged with the 13.05% <u>Value Line</u> market premium resulting in a 10.08 % market premium. In Ms. Ahern's opinion, the current and recent substantial decline in the stock market is extraordinary and not representative of the expected long-term. Consequently, in this instance, Ms. Ahern will not consider what she believes is an extraordinary expected capital appreciation and instead will rely only upon the 7.10% historical market premium which will be then multiplied by the beta in column 1 of page 20 of this Exhibit.

- (3) From the MIEC Witness Janous' Schedule BAJ-12.
- (4) The traditional Capital Asset Pricing Model (CAPM) is applied using the following formula:

 $R_S = R_F + \beta (R_M - R_F)$

Where R_S = Return rate of common stock R_F = Risk Free Rate β = Value Line Adjusted Beta R_M = Return on the market as a whole

(5) The empirical CAPM is applied using the foll