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SR-2026-0305  
Date: July 1, 2026

**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. WR-2026-0304  
CASE NO. SR-2026-0305**

**DIRECT TESTIMONY**

**OF**

**ANN E. BULKLEY**

**ON BEHALF OF**

**MISSOURI-AMERICAN WATER COMPANY**

**AFFIDAVIT**

I, Ann E. Bulkley, under penalty of perjury, and pursuant to Section 509.030, RSMo, state that I am a Principal at The Brattle Group, that the accompanying testimony has been prepared by me or under my direction and supervision; that if inquiries were made as to the facts in said testimony, I would respond as therein set forth; and that the aforesaid testimony is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Ann E. Bulkley

July 1, 2026  
Dated

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**DIRECT TESTIMONY  
OF  
ANN E. BULKLEY**

1       **I.     INTRODUCTION**

2       **Q.     Please state your name and business address.**

3       A.     My name is Ann E. Bulkley. I am a Principal at The Brattle Group (“Brattle”). My  
4       business address is One Beacon Street, Suite 2600, Boston, Massachusetts 02108.

5       **Q.     On whose behalf are you submitting this direct testimony?**

6       A.     I am submitting this testimony before the Missouri Public Service Commission  
7       (“Commission”) on behalf of Missouri-American Water Company (“MAWC” or the  
8       “Company”), a wholly-owned subsidiary of American Water Works Company, Inc.  
9       (“AWK”).

10      **Q.     Please describe your education and experience.**

11      A.     I hold a Bachelor of Arts degree in Economics and Finance from Simmons College and a  
12      Master of Science degree in Economics from Boston University, with over 30 years of  
13      experience consulting to regulated utilities and the energy industry. I have advised  
14      numerous energy and utility clients on a wide range of financial and economic issues with  
15      primary concentrations in valuation and utility rate matters. Many of these assignments  
16      have included the determination of the cost of capital for valuation and ratemaking  
17      purposes. My qualifications and testimony listing are presented in more detail in Schedule  
18      AEB-A.

1 **Q. What is the purpose of your direct testimony?**

2 A. The purpose of my Direct Testimony is to present evidence and provide a recommendation  
3 regarding the appropriate return on equity (“ROE”) for MAWC to be used for ratemaking  
4 purposes, as well as assess the reasonableness of the Company’s proposed capital structure.

5 **Q. Are you sponsoring any schedules in support of your direct testimony?**

6 A. Yes. My analyses and recommendations are supported by the data presented in Schedule  
7 AEB-1 through Schedule AEB-12, which were prepared by me or under my direction.

8 **Q. Please provide a brief overview of the analyses that lead to your ROE**  
9 **recommendation.**

10 A. I rely on the results of several analytical approaches to estimate the costs of equity for the  
11 Company. I have first developed a proxy group of utility companies that face risks  
12 generally comparable to those faced by MAWC. I have not limited the proxy group to  
13 water utilities, but rather have included a broader group of utilities that face risk similar to  
14 MAWC because there are only a few publicly traded water utilities remaining after merger  
15 activity. To that proxy group, I have applied the constant growth form of the Discounted  
16 Cash Flow (“DCF”) model, the Capital Asset Pricing Model (“CAPM”), and the Empirical  
17 Capital Asset Pricing Model (“ECAPM”).

18 My recommendation also takes into consideration the Company’s relative business and  
19 regulatory risk as compared with the proxy group, and the Company’s proposed capital  
20 structures as compared with the capital structures of the operating utilities of the companies  
21 contained in the proxy group. Although I do not make specific adjustments to my ROE

1 recommendation for these factors, I consider them in the aggregate when determining  
2 where my recommended ROE falls within the range of the analytical results.

3 **Q. How is the remainder of your testimony organized?**

4 A. The remainder of my direct testimony is organized as follows:

- 5 • Section II provides a summary of my analyses and conclusions.
- 6 • Section III reviews the regulatory guidelines pertinent to the development of the  
7 cost of capital.
- 8 • Section IV discusses current and prospective capital market conditions and the  
9 effect of those conditions on the Company's cost of equity.
- 10 • Section V explains my selection of a proxy group.
- 11 • Section VI describes my analyses and the basis for my recommendation regarding  
12 the appropriate ROE for the Company.
- 13 • Section VII provides a discussion of specific regulatory, business, and financial  
14 risks that have a direct bearing on the ROE to be authorized for the Company in  
15 this proceeding.
- 16 • Section VIII provides an assessment of the reasonableness of the Company's  
17 proposed capital structure.
- 18 • Section IX presents my conclusions and recommendations.

19 **II. SUMMARY OF ANALYSES AND CONCLUSIONS**

20 **Q. Please summarize the key factors considered in your analyses and upon which you**  
21 **base your recommended ROE.**

22 A. In developing my recommended ROE for MAWC, I have considered the following:

- 1           • The United States (“U.S.”) Supreme Court’s *Hope* and *Bluefield* decisions,<sup>1</sup> which  
2           established the standards for determining a fair and reasonable authorized ROE for  
3           public utilities, including consistency of the authorized return with other businesses  
4           having similar risk, adequacy of the return to ensure access to capital and support  
5           credit quality, and the necessity for the end result to lead to just and reasonable  
6           rates.
- 7           • The effect of current and prospective capital market conditions on the cost of equity  
8           estimation models and on investors’ return requirements.
- 9           • The results of several analytical approaches that provide estimates of the  
10          Company’s cost of equity. Because the Company’s authorized ROE should be a  
11          forward-looking estimate over the period during which the rates will be in effect,  
12          these analyses rely on forward-looking inputs and assumptions (*e.g.*, projected  
13          analyst growth rates in the DCF model; forecasted risk-free rate and market risk  
14          premium in the CAPM analysis).
- 15          • Although the companies in my proxy group are generally comparable to MAWC,  
16          each company is unique, and no two companies have the exact same business and  
17          financial risk profiles. Accordingly, I considered the Company’s regulatory,  
18          business, and financial risks relative to the proxy group of comparable companies  
19          in determining where the Company’s ROE should fall within the reasonable range  
20          of analytical results to appropriately account for any residual differences in risk.

21 **Q.     What are the results of the models that you have used to estimate the cost of equity**  
22 **for MAWC?**

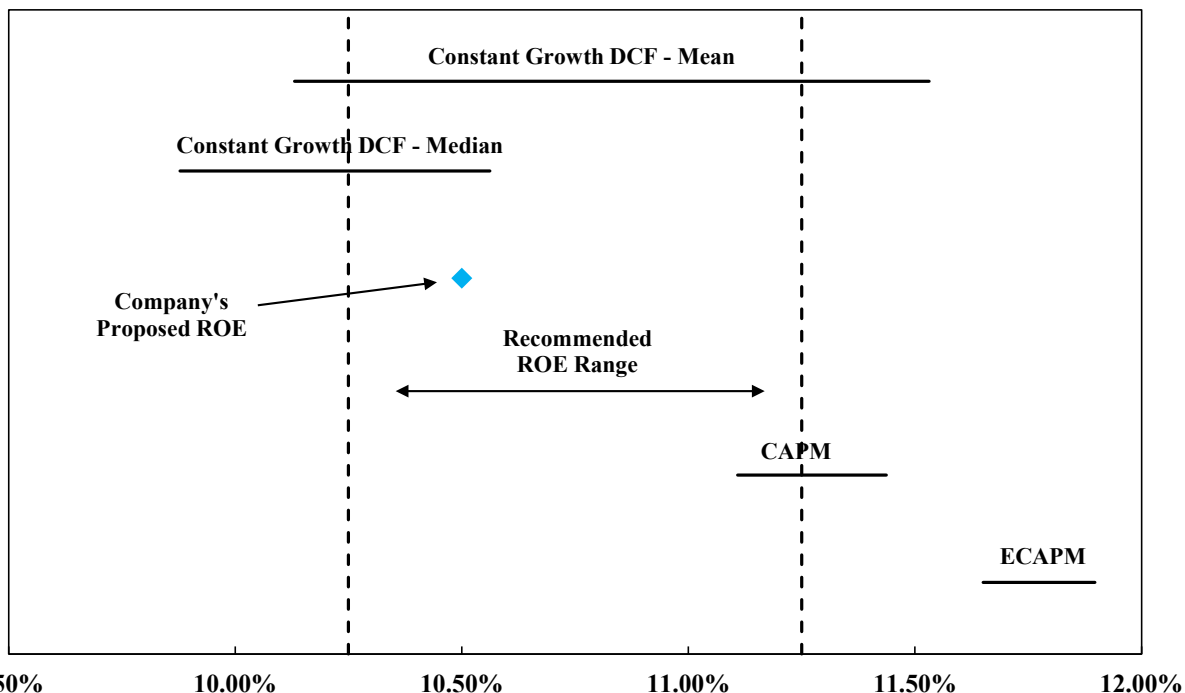
23 A.     Figure 1 summarizes the range of results produced by the constant growth DCF, CAPM,  
24         and ECAPM analyses based on data through April 30, 2026.

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<sup>1</sup> *Federal Power Commission v. Hope Natural Gas Co.*, 320 U.S. 591 (1944) (“*Hope*”); *Bluefield Waterworks & Improvement Co., v. Public Service Commission of West Virginia*, 262 U.S. 679 (1923) (“*Bluefield*”).

1

**Figure 1: Summary of the Range of Analytical Results**



2

3 **Q. What is your recommended ROE for the Company in this proceeding?**

4 A. Considering the analytical results presented in Figure 1, current and prospective capital  
5 market conditions, as well as the level of regulatory, business, and financial risk faced by  
6 MAWC's water operations relative to the proxy group, a range for the authorized ROE  
7 from 10.25 percent to 11.25 percent is reasonable, and within that range, the Company's  
8 requested ROE of 10.50 percent is reasonable.

9 **Q. Is MAWC's requested capital structure reasonable?**

10 A. Yes. The Company's proposed capital structure of 50.34 percent equity and 49.66 percent  
11 long-term debt is well within the range of the actual capital structures of the utility

1 operating subsidiaries of the proxy group companies, and, in fact, is well below the average  
2 equity ratio of those same companies.

### 3 **III. REGULATORY GUIDELINES**

4 **Q. Please describe the principles that guide the establishment of the cost of capital for a**  
5 **regulated utility.**

6 A. The U.S. Supreme Court's precedent-setting *Hope* and *Bluefield* cases established the  
7 standards for determining the fairness or reasonableness of a utility's authorized ROE.  
8 Among the standards established by the Court in those cases are: (1) consistency with other  
9 businesses having similar or comparable risks; (2) adequacy of the return to support credit  
10 quality and access to capital; and (3) the principle that the specific means of arriving at a  
11 fair return are not important, as long as the end result leads to just and reasonable rates.<sup>2</sup>

12 **Q. Why is it important for a utility to be allowed the opportunity to earn a return that is**  
13 **adequate to attract capital at reasonable terms?**

14 A. An ROE that is adequate to attract capital at reasonable terms enables the Company to  
15 continue to provide safe, reliable service while maintaining its financial integrity. That  
16 return should be commensurate with returns expected elsewhere in the market for  
17 investments of equivalent risk. If it is not, investors will seek alternative investment  
18 opportunities for which the expected return reflects the perceived risks, thereby inhibiting  
19 the Company's ability to attract capital at reasonable cost.

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<sup>2</sup> *Bluefield*, 262 U.S. at 692-93; *Hope*, 320 U.S. at 603.

1 **Q. How did the Court connect achieving a fair rate of return to providing utility service**  
2 **to customers?**

3 A. The Court stated in *Bluefield*, a proper rate of return not only assures “confidence in the  
4 financial soundness of the utility and should be adequate, under efficient and economical  
5 management, to maintain and support its credit [but also] enable[s the utility] to raise the  
6 money necessary for the proper discharge of its public duties.”<sup>3</sup>

7 **Q. Why is it important for a utility to be allowed the opportunity to earn an ROE that is**  
8 **adequate to attract capital at reasonable terms?**

9 A. An authorized ROE that is adequate to attract capital at reasonable terms enables a utility  
10 to continue to provide safe, reliable service while maintaining its financial integrity. That  
11 return should be commensurate with returns required by investors elsewhere in the market  
12 for investments of comparable risk. It is important to recognize that equity investors have  
13 a choice of where to invest capital. It is reasonable to expect that equity investors will seek  
14 alternative investment opportunities for which the expected return reflects the perceived  
15 risks, thereby inhibiting the Company’s ability to attract necessary new equity capital at  
16 reasonable cost.

17 **Q. Is a utility’s ability to attract capital also affected by the ROEs authorized for other**  
18 **utilities?**

19 A. Yes. Utilities compete directly for capital with other investments of similar risk, which  
20 include other utilities. Therefore, the ROE authorized for a utility sends an important signal

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<sup>3</sup> *Bluefield*, 262 U.S. at 679, 693.

1 to investors regarding whether there is regulatory support for financial integrity, dividends,  
2 growth, and fair compensation for business and financial risk. The cost of capital  
3 represents an opportunity cost to investors. If higher returns are available for other  
4 investments of comparable risk, over the same period, investors have an incentive to direct  
5 their capital to those alternative investments. Thus, an authorized ROE significantly below  
6 authorized ROEs for other utilities can inhibit the utility's ability to attract capital for  
7 investment.

8 **Q. What is the standard for setting the ROE in a jurisdiction?**

9 A. The stand-alone ratemaking principle is the foundation of jurisdictional ratemaking,  
10 requiring that the rates that are charged in any operating jurisdiction are incurred in that  
11 jurisdiction. The stand-alone ratemaking principle ensures that customers in each  
12 jurisdiction only pay for the costs of the service provided in that jurisdiction, which is not  
13 influenced by the business operations in other operating companies. To maintain this  
14 principle, the cost of equity analysis is performed for an individual operating company as  
15 a stand-alone entity. As such, I have evaluated the investor-required return for the  
16 Company's utility operations in Missouri.

17 **Q. Does the fact that the Company is wholly-owned by AWK, a publicly-traded**  
18 **company, affect your analysis?**

19 A. No. In this proceeding, consistent with stand-alone ratemaking principles, it is appropriate  
20 to establish the cost of equity for MAWC, not its publicly-traded parent, AWK. More  
21 importantly, however, it is appropriate to establish a cost of equity and capital structure

1 that provide MAWC the ability to attract capital on reasonable terms, both on a stand-alone  
2 basis and within AWK.

3 **Q. Is the regulatory framework and the authorized ROE and equity ratio important to**  
4 **the financial community?**

5 A. Yes. The regulatory framework is one of the most important factors in investors'  
6 assessments of risk. Specifically, the authorized ROE and equity ratio for regulated utilities  
7 is very important for determining the degree of regulatory support for a utility's credit  
8 quality and financial stability in the jurisdiction. To the extent that the authorized returns  
9 in a jurisdiction are lower than the returns that have been authorized more broadly, credit  
10 rating agencies will consider this in the overall risk assessment of the regulatory  
11 jurisdiction in which the utility operates.

12 **Q. What are your conclusions regarding regulatory guidelines?**

13 A. The ratemaking process is premised on the principle that, for investors and companies to  
14 commit the capital needed to provide safe and reliable utility services to customers, a utility  
15 must have a reasonable opportunity to recover the return of, and the market-required return  
16 on, its invested capital. Accordingly, the Commission's order in this proceeding should  
17 establish rates that provide the Company with a reasonable opportunity to earn a ROE that  
18 is: (1) adequate to attract capital on reasonable terms; (2) sufficient to ensure its financial  
19 integrity; and (3) commensurate with returns on investments in enterprises with similar  
20 risk. It is important for the ROE authorized in this proceeding to take into consideration  
21 current and projected capital market conditions, as well as investors' expectations and

1 requirements for both risks and returns. Because utility operations are capital-intensive,  
2 regulatory decisions should enable the utility to attract capital at reasonable terms under a  
3 variety of economic and financial market conditions. Providing the opportunity to earn a  
4 market-based cost of capital supports the financial integrity of the Company, which is in  
5 the interest of both customers and shareholders.

#### 6 **IV. CAPITAL MARKET CONDITIONS**

7 **Q. Why is it important to analyze capital market conditions?**

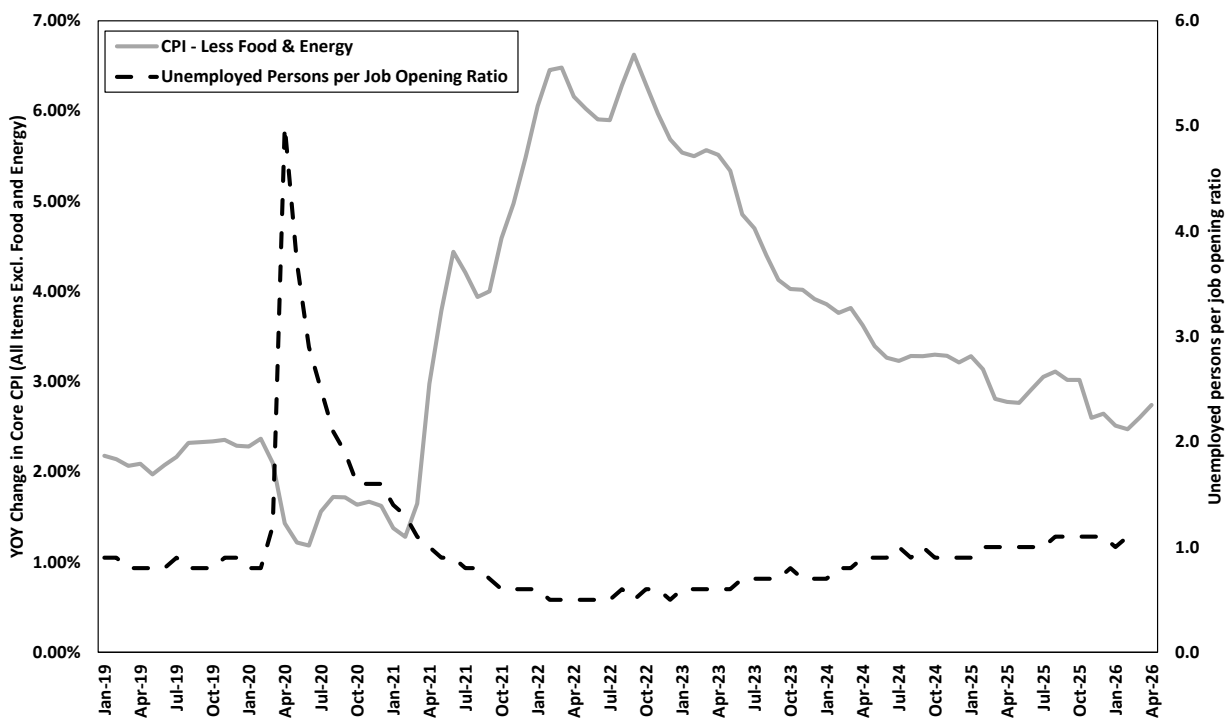
8 A. Capital market conditions influence cost of equity models by affecting inputs in the model  
9 at the time the analysis is performed. While the ROE that is established in a rate proceeding  
10 is intended to be forward-looking, the analyst uses current and projected market data,  
11 specifically stock prices, dividends, growth rates and interest rates, in the models to  
12 estimate the required return for the subject company.

13 Analysts and regulatory commissions recognize the importance of considering how these  
14 conditions affect the results of the cost of equity estimation models when determining the  
15 appropriate range and recommended ROE for a future period. If investors do not expect  
16 current market conditions to be sustained in the future, it is possible that the cost of equity  
17 estimation models will not provide an accurate estimate of investors' required return during  
18 that rate period. Therefore, it is important to consider projected market data to estimate  
19 the return for the forward-looking period.

1 **Q. What has the level of inflation been over the past few years?**

2 A. As shown in Figure 2, core inflation increased steadily beginning in early 2021, rising from  
3 1.40 percent in January 2021 to a high of 6.64 percent in September 2022, which was the  
4 largest 12-month increase since 1982.<sup>4</sup> While core inflation has declined in response to  
5 the Federal Reserve’s monetary policy, it continues to remain above the Federal Reserve’s  
6 target level of 2.00 percent.

7 **Figure 2: Core Inflation and Unemployed Persons-to-Job Openings, January 2019 to April**  
8 **2026<sup>5</sup>**



9

<sup>4</sup> Reade Pickert, “Core US Inflation Rises to 40-Year High, Securing Big Fed Hike”, *Bloomberg*, October 13, 2022.

<sup>5</sup> Bureau of Labor Statistics; reflects data available as of May 19, 2026. The data for Core Inflation was available through April 2026. The last month that was published for Unemployed persons to job openings was March 2026.

1           Because the Federal Reserve’s dual mandate is to promote stable prices and  
2 employment, it is important to consider employment data in addition to inflation. The ratio  
3 of unemployed persons per job opening was 1.10 in March 2026 (the most recent data  
4 available as of May 19, 2026). While the ratio of unemployed persons per job opening  
5 increased slightly in recent months, it had been consistently at or below 1.00 between April  
6 2021 and October 2025, which suggested a tighter labor market. The strength in the labor  
7 market allowed the Federal Reserve to prioritize reducing inflation by pursuing the  
8 restrictive monetary policy needed to achieve its 2.00 percent target benchmark.

9 **Q. What policy actions has the Federal Reserve enacted to respond to increased**  
10 **inflation?**

11 A. The dramatic increase in inflation prompted the Federal Reserve to pursue an aggressive  
12 normalization of monetary policy, removing the accommodative policy programs used to  
13 mitigate the economic effects of COVID-19. Between the March 2022 Federal Open  
14 Market Committee (“FOMC”) meeting and the July 2023 FOMC meeting, the Federal  
15 Reserve increased the target federal funds rate through a series of increases from a range  
16 of 0.00 – 0.25 percent to a range of 5.25 percent to 5.50 percent.

17 **Q. How did yields on long-term government bonds respond to the Federal Reserve’s**  
18 **normalization of monetary policy?**

19 A. Since the Federal Reserve’s December 2021 meeting, the yield on 10-year Treasury bonds  
20 has increased by over 350 basis points, increasing from 1.47 percent on December 15,

1 2021, to a peak of 4.98 percent on October 19, 2023. It currently remains well above 2021  
2 levels (i.e., 5.18 percent as of May 19, 2026).<sup>6</sup>

3 **Q. Did the Federal Reserve recently reduce the federal funds rates?**

4 A. Yes. The Federal Reserve reduced the federal funds rate by 50 basis points in September  
5 2024, 25 basis points in November 2024, 25 basis points in December 2024, and more  
6 recently 25 basis points in September 2025, October 2025 and December 2025. While the  
7 Federal Reserve kept rates unchanged through the first five meetings in 2025, its decision  
8 to reduce the federal funds rate at the final three meetings in 2025 was due to an increase  
9 in the downside risk to employment in recent months.<sup>7</sup>

10 **Q. What is the expected path of monetary policy over the near-term?**

11 A. At the March 2026 FOMC meeting, then Chair Powell noted that inflation remains  
12 “somewhat elevated” and that “[w]hile job gains have remained low, the unemployment  
13 rate has been little changed in recent months.”<sup>8</sup> As a result, the FOMC decided to maintain  
14 the federal funds rate range of 3.50 percent to 3.75 percent.<sup>9</sup> Further, Chair Powell  
15 acknowledged that the events in the Middle East have resulted in higher energy prices,  
16 which will increase inflation; however, it was too soon to know the “scope and duration of

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<sup>6</sup> *S&P Capital IQ Pro*.

<sup>7</sup> Federal Reserve, “Federal Reserve issues FOMC statement,” Press Release, September 17, 2025, October 29, 2025, and December 10, 2025.

<sup>8</sup> Federal Reserve, “Transcript of Jerome Powell’s Press Conference,” March 18, 2026.

<sup>9</sup> *Id.*

1 the potential effects on the economy.”<sup>10</sup> Regarding the possible path of monetary policy,  
2 Chair Powell indicated that the reductions since September have brought the federal funds  
3 rate “within a range of plausible estimates of [the] neutral” rate and therefore, the Federal  
4 Reserve is well positioned to rely on incoming economic data to determine the extent and  
5 timing of any additional changes in the federal funds rates.<sup>11</sup> The FOMC published a  
6 forecast of the federal funds rate at the March 2026 meeting that was unchanged from the  
7 December 2025 projections of one rate cut in December 2026.<sup>12</sup>

8 **Q. What has happened to the yields on long-term government bonds since the FOMC**  
9 **reduced the federal funds rate in September 2024?**

10 A. As shown in Figure 3, although the yield on the 10-year treasury bond declined prior to the  
11 time of the first federal funds rate cut, the yield has generally increased since the September  
12 2024 FOMC meeting. Further, while the yield on the 10-year Treasury bond has been  
13 volatile recently, as of May 15, 2026, the 10-year Treasury bond yield was 4.59 percent,  
14 which is generally consistent with levels seen in May 2024, four months prior to the first  
15 reduction in the federal funds rate.

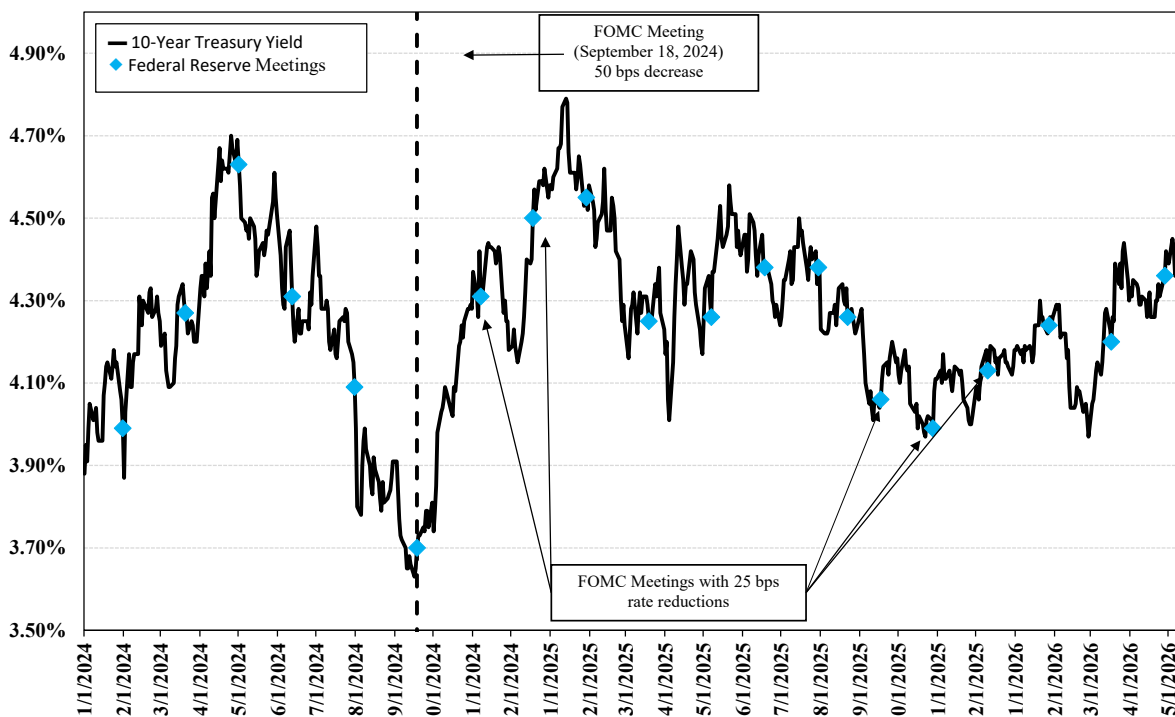
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<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> Federal Reserve, “Transcript of Chair Powell’s Press Conference”, March 18, 2026.

1 **Figure 3: 10-Year Treasury Bond Yield, January 2024 through May 15, 2026<sup>13</sup>**



2

3 **Q. Why have long-term interest rates remained above the levels at the time the Federal**

4 **Reserve first reduced the federal funds rate in September 2024?**

5 **A.** Ongoing policies of the current administration’s economic plans have resulted in higher

6 deficits, and persistent inflation. For example, since January 2025, the administration

7 announced several sets of tariffs on each of the U.S.’s trading partners.<sup>14</sup> The implemented

8 tariffs are largely viewed as inflationary. Inflation affects bonds, in particular long-term

9 government bonds, because it erodes the value of future bond payments. Therefore, in an

10 inflationary environment, investors will demand higher returns on bonds to compensate for

<sup>13</sup> S&P Capital IQ Pro.

<sup>14</sup> Jennifer Clarke, “What Are Tariffs, How Do They Work and Why Is Trump Using Them?” *BBC News*, August 27, 2025.

1 the added risk of inflation thus bond prices decline and the yields on those bonds increase.  
2 The longer the duration of the bond, the greater the effect of inflation which is why inflation  
3 risk is greater for long-term government bonds. The significant tariff policy increases the  
4 risk that inflation will remain elevated, which is why the yields on long-term bonds have  
5 not decreased and in fact have increased since the Federal Reserve first reduced the federal  
6 funds rate in September 2024. Further, the use of tariffs strains the relationship with trading  
7 partners, which could result in a reduction in the foreign demand for long-term U.S.  
8 government bonds resulting in additional upward pressure on long-term government bond  
9 yields.<sup>15</sup>

10 **Q. What effect does the recent U.S. Supreme Court ruling have on the tariffs**  
11 **implemented by the administration in 2025?**

12 A. On February 20, 2026, the U.S. Supreme Court ruled that the tariffs implemented in 2025  
13 under the International Emergency Economic Powers Act (“IEEPA”) were illegal.  
14 However, the administration responded to the ruling by imposing a 15.00 percent tariff on  
15 all goods imported into the U.S. under Section 122 of the 1974 Trade Act.<sup>16</sup> Section 122  
16 of the 1974 Trade Act allows a President to implement global tariffs up to 15.00 percent  
17 for a period of five months after which the approval of Congress is needed for continuation  
18 of the tariffs. Therefore, the administration is still able to at least temporarily impose global  
19 tariffs, which as noted above will continue to place upward pressure on prices.

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<sup>15</sup> Karishma Vanjani, “U.S. Treasury Bonds Sell Off as 30-Year Yield Rises Most Since 1982,” *Barron’s*, April 9, 2025.

<sup>16</sup> Dearbail Jordan, “Trump says he will increase his new global tariffs to 15%,” BBC, February 22, 2026.

1 **Q. Have there been any other recent developments that may affect inflation and long-**  
2 **term government bond yields?**

3 A. Yes. The war in Iran and the resulting increase in underlying oil prices will likely put  
4 upward pressure on inflation as increased oil prices not only increase gasoline prices for  
5 consumers but the prices of other products as well as nearly all goods need to be transported  
6 from the place of production. The likelihood of continued elevated inflation suggests  
7 interest rates will remain higher in the near term. In fact, as shown in Figure 3, since the  
8 start of the war in Iran, the yield on the 10-year Treasury bond has increased 62 basis points  
9 from 3.97 percent on February 27, 2026 to 4.59 percent on May 15, 2026.

10 **Q. What are expectations for the yields on long-term government bonds?**

11 A. While the Federal Reserve is forecasting additional cuts to the federal funds rate in 2026  
12 and 2027, economists are still expecting elevated long-term interest rates. In the most  
13 recently published report by *Blue Chip Financial Forecasts*, the consensus estimate of  
14 economists is that the 30-year treasury bond yield will remain relatively stable and decrease  
15 only slightly from 4.90 percent in Q2/2026 to 4.80 percent in Q3/2027.<sup>17</sup> Additionally, the  
16 consensus estimate over the longer-term (*i.e.*, 2027–2031) is 4.60 percent.<sup>18</sup> This is  
17 important because it means that long-term interest rates are expected to remain elevated  
18 during the period that the Company’s rates will be in effect.

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<sup>17</sup> *Blue Chip Financial Forecasts*, Vol. 45, No. 5, May 1, 2026, at 2.

<sup>18</sup> *Blue Chip Financial Forecasts*, Vol. 44, No. 12, December 1, 2025, at 14.

1 **Q. What are your conclusions regarding the effect of current market conditions on the**  
2 **cost of equity for the Company?**

3 A. It is important to consider current and projected market conditions in setting the forward-  
4 looking ROE due to its effect on the estimated cost of equity. While the FOMC reduced  
5 the federal funds rate several times in late 2025, Chairman Powell has indicated that the  
6 Federal Reserve will continue to rely on incoming data to determine future adjustments to  
7 the federal funds rate. Further, long-term interest rates remain elevated and are expected  
8 to continue to remain elevated due to inflationary policies such as tariffs and tax cuts and  
9 the uncertainty regarding the Iran conflict and the increase in underlying energy costs.  
10 With long-term interest rates expected to remain relatively high, borrowing also remains  
11 relatively more expensive, and thus investors also demand a relatively high cost of capital,  
12 which means the cost of capital also remains relatively high.

## 13 **V. PROXY GROUP SELECTION**

14 **Q. Please provide a brief profile of MAWC.**

15 A. MAWC, a wholly-owned subsidiary of AWK, provides water and wastewater service to  
16 approximately 485,700 water customers and 23,500 wastewater customers in Missouri.<sup>19</sup>  
17 As of December 31, 2025, MAWC earned total annual operating revenues of \$575 million,  
18 which represented 12.2 percent of AWK's total operating revenue in 2025.<sup>20</sup> MAWC  
19 generally accesses debt markets through American Water Capital Corp. ("AWCC"). The

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<sup>19</sup> Company provided data.

<sup>20</sup> American Water Works Company, Inc. SEC Form 10-K, December 31, 2025, at 6.

1 current credit ratings on senior unsecured debt for AWK and AWCC are as follows: (1)  
2 S&P: A (Outlook: Stable); and (2) Moody's: Baa1 (Outlook: Stable). MAWC is not  
3 separately rated from AWK.<sup>21</sup>

4 **Q. Why have you used a group of proxy companies to estimate the cost of equity for**  
5 **MAWC?**

6 A. In this proceeding, I am estimating the cost of equity for MAWC, a rate-regulated  
7 subsidiary of AWK. Since the cost of equity is a market-based concept and given the fact  
8 that MAWC does not make up the entirety of a publicly-traded entity, it is necessary to  
9 establish a group of companies that is both publicly traded and comparable to MAWC in  
10 certain fundamental business and financial respects to serve as its “proxy” for purposes of  
11 estimating the cost of equity.

12 Even if the Company was a publicly traded entity, it is possible that transitory events could  
13 bias its market value over a given period. Using a proxy group moderates the effects of  
14 unusual events that may be associated with any one company. The companies included in  
15 the proxy group all possess a set of operating and risk characteristics that are substantially  
16 comparable to the Company and thus provide a reasonable basis to derive and estimate the  
17 appropriate cost of equity for the Company.

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<sup>21</sup> S&P Global Ratings and Moody's Ratings, accessed May 19, 2026.

1 **Q. How did you select the companies included in your proxy group?**

2 A. I began with the group of companies that *Value Line* Investment Survey (“*Value Line*”)  
3 classifies as Water Utilities and Natural Gas Distribution Utilities and applied the following  
4 screening criteria to select companies that:

- 5 • pay consistent quarterly cash dividends because companies that do not pay  
6 dividends cannot be analyzed using the DCF model;
- 7 • have an investment grade long-term issuer rating;
- 8 • have positive long-term earnings growth forecasts from at least two utility industry  
9 equity analysts;
- 10 • derive more than 70.00 percent of their total operating income from regulated  
11 operations; and
- 12 • were not parties to a merger or transformative transaction during the analytical  
13 periods relied on.

14 **Q. Why did you consider natural gas distribution companies in the proxy group?**

15 A. *Value Line* currently classifies only seven companies as water utilities and there is limited  
16 analyst coverage for these companies. Therefore, the universe of water utilities is already  
17 small before a set of screening criteria are applied. Additionally, there has been a trend  
18 towards consolidation in the utility industry, which reduces the number of available proxy  
19 companies. In fact, on October 27, 2025, AWK and Essential Utilities (“Essential”)  
20 announced they are merging,<sup>22</sup> and thus both companies should be excluded from the proxy  
21 group as a result of this transaction. Because there are a small number of companies that

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<sup>22</sup> “American Water and Essential Utilities to Merge as a Leading Regulated U.S. Water and Wastewater Utility,” American Water Works press release, October 27, 2025.

1 are available for inclusion in the proxy group, I also consider natural gas distribution  
2 companies that meet the screening criteria.

3 **Q. Is there another reason that you have excluded AWK from your proxy group?**

4 A. Yes. In addition to the ongoing merger with Essential, it is not appropriate to include AWK  
5 in the proxy group used to determine the authorized ROE for MAWC because of the  
6 circular logic that would occur. If AWK were included in the proxy group, AWK would  
7 be used to determine its own subsidiary's ROE. Therefore, to avoid the circular logic, I  
8 exclude AWK from my proxy group for MAWC.

9 **Q. Are natural gas utilities reasonably comparable to water utilities to be included in a  
10 proxy group used to estimate the cost of equity for a water utility?**

11 A. Yes. It is reasonable to consider natural gas companies for purposes of establishing a proxy  
12 group of companies that are reasonably comparable to MAWC. MAWC is a regulated  
13 utility distribution company, which is similar to other regulated utility distribution  
14 companies that provide natural gas services instead of water distribution. My screening  
15 criteria require that a company derive more than 70.00 percent of its operating income from  
16 regulated operations. Therefore, the natural gas distribution companies included in my  
17 proxy group generate a large portion of their operating income from regulated operations  
18 similar to MAWC and the water utilities included in the proxy group.

19 Recent consolidation in the utility industry has demonstrated the similar nature of water,  
20 and natural gas distribution utilities. Consolidation within the water utility industry has  
21 occurred not only among water-only utilities, but there have also been acquisitions that

1 have involved the merger of a natural gas utility with a water utility. For example, in 2017,  
2 Northwest Natural Gas Company (“Northwest Natural”) acquired Salmon Valley Water  
3 Company and Falls Water Company, two water utilities operating in the Pacific Northwest,  
4 and one of the reasons cited for the merger was the similarity in operating characteristics  
5 and risk profiles of the natural gas and water utilities. In an interview regarding the  
6 transaction, the CEO of Northwest Natural noted:

7 While these transactions and the companies' continuing operations are not  
8 expected to have a material impact on NW Natural's financial results, we  
9 view these acquisitions as the first step in a broader strategy. The water  
10 utility sector has a risk profile and business model that is similar to our core  
11 gas utility. There are also substantial investment opportunities over the long  
12 term, as water infrastructure needs to be replaced and upgraded to serve  
13 growing communities with safe, clean drinking water.<sup>23</sup>

14 Similarly, in 2020, Essential completed the acquisition of PNG Companies, LLC, a natural  
15 gas utility operating in Pennsylvania, West Virginia, and Kentucky. In discussing the  
16 acquisition, Essential’s Chairman and CEO Chris Franklin noted that:

17 ...both gas and water utilities are underground utilities, and that the systems  
18 share a common burden of being old and in need of replacement. However,  
19 he said rates will not go up for “a number of years,” and that any increase  
20 would require approval from the PUC.<sup>24</sup>

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<sup>23</sup> Northwest Natural Gas Company, Press Release, “NW Natural Expands into Regulated Water Utility Sector with Acquisitions in Oregon and Idaho,” December 21, 2017.

<sup>24</sup> Margaret J. Krauss, “Aqua America Will Buy Peoples Gas For \$4.3 Billion,” 90.5 WESA (NPR), January 16, 2020.

1 **Q. Have other regulators considered the inclusion of other utility industry segments in**  
2 **the proxy group used to estimate the cost of equity for a water utility?**

3 A. Yes. For example, the Massachusetts Department of Public Utilities (“MDPU”), the  
4 Florida Public Service Commission (“FPUC”), and the Illinois Commerce Commission  
5 (“ICC”) have considered the results of a proxy group that includes natural gas companies  
6 when determining the authorized ROE for water utilities:

- 7 • In Docket No. 17-90, the MDPU determined that the use of a natural gas utility  
8 proxy group was appropriate for the purpose of demonstrating the comparability of  
9 the investment risk of the proxy group to Aquarion Water Company.<sup>25</sup>
- 10 • In Docket No. 20180006-WS, the FPUC modified the methodology used to  
11 estimate the ROE for water and wastewater utilities in Florida to include a  
12 combined proxy group of natural gas and water utilities.<sup>26</sup> The FPUC has  
13 previously relied on a natural gas only proxy group to estimate the ROE for water  
14 and wastewater utilities;<sup>27</sup> however, to increase the size of the proxy group, the  
15 FPUC decided to rely on a combined proxy group. Specifically, the FPUC noted:

16 The leverage formula methodology shall be modified to include a  
17 combined proxy group of natural gas and WAW utilities as proxy  
18 companies in calculating the leverage formula. We find that the  
19 selected natural gas utilities and WAW utilities that derive at least  
20 50 percent of their revenue from regulated rates. These utilities have  
21 market power and are influenced significantly by economic  
22 regulation. In Attachment 1, the returns calculated using the proxy  
23 group are adjusted to reflect the risks faced by Florida WAW  
24 utilities. The updated index consists of five natural gas companies  
25 and seven WAW companies that derive at least 50 percent of their

---

25 Massachusetts Department of Public Utilities, Docket No. 17-90, Oct. 31, 2018, at 286-287.

26 Florida Public Service Commission, Docket No. 20180006-WS, Order No. PSC-2018-0327-PAA-WS, June 26, 2018, at 7.

27 Florida Public Service Commission, Docket No. 170006-WS, Order No. PSC-17-0249-PAA-WS, June 26, 2017, at 2.

1 total revenue from regulated operations. These companies have a  
2 median Standard and Poor’s bond rating of “A.”<sup>28</sup>

3 In Case No. 22-0210, for Illinois-American Water Company, the ICC agreed that a  
4 proxy group of water and public utility companies was a reasonable sample upon which to  
5 apply the various COE estimation models.<sup>29</sup>

6 **Q. How does the extent of the analyst coverage of the water utilities compare to that of**  
7 **the natural gas utilities in the proxy group?**

8 A. While there is limited analyst coverage of the water utilities, there is more coverage of the  
9 natural gas utilities. For example, *S&P Capital IQ* reports the number of estimates that  
10 contribute to their projected growth rates, and as shown in Figure 4, only one water utility  
11 proxy company has multiple analysts contributing to the forecast, whereas there are  
12 multiple analysts contributing estimates for the majority of the natural gas utilities in the  
13 proxy group.

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<sup>28</sup> Florida Public Service Commission, Docket No. 20180006-WS, Order No. PSC-2018-0327-PAA-WS, June 26, 2018, at 8.

<sup>29</sup> Illinois Commerce Commission, Docket No. 22-0210, Order, Dec. 15, 2022, at 102.

1 **Figure 4: Number of Analysts Contributing to S&P Capital IQ EPS Growth Projections<sup>30</sup>**

Company	Ticker	Number of Analysts
Atmos Energy Corporation	ATO	2
Chesapeake Utilities Corporation	CPK	1
NiSource Inc.	NI	4
Northwest Natural Gas Company	NWN	1
ONE Gas, Inc.	OGS	1
Southwest Gas Corporation	SWX	3
American States Water Company	AWR	1
California Water Service Group	CWT	1
Middlesex Water Company	MSEX	1
H2O America (SJW Group)	HTO	2

2

3 **Q. Have you compared financial risk metrics of the water utilities and natural gas**  
 4 **utilities in your proxy group?**

5 A. Yes. I have reviewed the *Value Line* safety rankings,<sup>31</sup> *Value Line* timeliness rankings,<sup>32</sup>  
 6 and *Value Line* betas for the water and natural gas companies in my proxy group, and as  
 7 shown in Figure 5, these metrics demonstrate that the natural gas companies and water  
 8 companies in my proxy group have similar risk characteristics.

---

<sup>30</sup> *S&P Capital IQ*.

<sup>31</sup> *Value Line's* Safety ranking measures the risk associated with a stock, considering financial strength and volatility. The ranking is from 1 (highest) to 5 (lowest).

<sup>32</sup> *Value Line's* Timeliness ranking measures the forecasted relative market performance in the next 12 months. The ranking is from 1 (highest and most likely to outperform most stocks) to 5 (lowest and most likely to underperform most stock).

1 **Figure 5: Water and Natural Gas Companies Comparison**<sup>33</sup>

	<u>Water</u>	<u>Natural Gas</u>
Safety Ranking	2.25	1.83
Timeliness Ranking	3.25	3.8
Beta	0.76	0.78

2  
3 **Q. What is the composition of your proxy group?**

4 A. The screening criteria just discussed results in a proxy group consisting of the companies  
5 shown in Figure 6 and detailed in Schedule AEB-2.

6 **Figure 6: Proxy Group**

<u>Company</u>	<u>Ticker</u>
Atmos Energy Corporation	ATO
Chesapeake Utilities Corporation	CPK
NiSource Inc.	NI
Northwest Natural Gas Company	NWN
ONE Gas, Inc.	OGS
Southwest Gas Corporation	SWX
American States Water Company	AWR
California Water Service Group	CWT
Middlesex Water Company	MSEX
<u>H2O America (SJW Group)</u>	<u>HTO</u>

7  
8 **VI. COST OF EQUITY ESTIMATION**

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

10 A. The overall rate of return for a regulated utility is the weighted average cost of capital, in  
11 which the costs of the individual sources of capital are weighted by their respective

---

<sup>33</sup> *Value Line*, February 20, 2026 and April 3, 2026.

1 proportion (*i.e.*, book values) in the utility's capital structure. The ROE is the cost rate  
2 applied to the equity capital in calculating the overall rate of return for ratemaking  
3 purposes. While the costs of debt and preferred stock can be directly observed, the cost of  
4 equity is market-based and, therefore, must be estimated based on observable market data.

5 **Q. How is the required cost of equity determined?**

6 A. The required cost of equity is estimated using analytical techniques that rely on market-  
7 based data to quantify investor expectations regarding equity returns, adjusted for certain  
8 incremental costs and risks. Informed judgment is then applied to determine where the  
9 company's cost of equity falls within the range of results produced by multiple analytical  
10 techniques. The key consideration in determining the cost of equity is to ensure that the  
11 methodologies employed reasonably reflect investors' views of the financial markets in  
12 general, as well as the subject company (in the context of the proxy group) in particular.

13 **Q. What methods have you used to estimate MAWC's cost of equity?**

14 A. As noted, I consider the results of the constant growth DCF, CAPM, and ECAPM analyses.

15 **Q. Is it important to use more than one analytical approach to estimate the cost of**  
16 **equity?**

17 A. Yes. A reasonable cost of equity estimate appropriately considers alternative  
18 methodologies and the reasonableness of their individual and collective results. Because  
19 the cost of equity is not directly observable, it must be estimated based on both quantitative  
20 and qualitative information. When faced with the task of estimating the cost of equity,  
21 analysts and investors are inclined to gather and evaluate as much relevant data as

1 reasonably can be analyzed. Several models have been developed to estimate the cost of  
2 equity, and I use multiple approaches to estimate the cost of equity. As a practical matter,  
3 however, all the models available for estimating the cost of equity are subject to limiting  
4 assumptions or other methodological constraints. Consequently, many well-regarded  
5 finance texts recommend using multiple approaches when estimating the cost of equity.  
6 For example, Copeland, Koller, and Murrin<sup>34</sup> suggest using the CAPM and Arbitrage  
7 Pricing Theory model, while Brigham and Gapenski<sup>35</sup> recommend the CAPM, DCF, and  
8 Bond Yield Plus Risk Premium approaches.

9 **Q. Has the Commission previously recognized the importance of considering the results**  
10 **of multiple cost of equity estimation models?**

11 A. Yes. For example, in 2018 the Commission stated:

12 In order to set a fair rate of return for Spire, the Commission must determine  
13 the weighted cost of each component of the utility's capital structure. One  
14 component at issue in this case is the estimated cost of common equity, or  
15 the return on equity. Based on the competent and substantial evidence in  
16 the record, on its analysis of the expert testimony offered by the parties, and  
17 on its balancing of the interests of the company's ratepayers and  
18 shareholders, as fully explained in its findings of fact and conclusions of  
19 law, the Commission finds that 9.8 percent is a fair and reasonable return  
20 on equity for Spire Missouri. That rate is nearly the midpoint of all the  
21 experts' recommendations and is consistent with the national average, the  
22 growing economy, and the anticipated increasing interest rates. The  
23 Commission finds that this rate of return will allow Spire Missouri to

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<sup>34</sup> Tom Copeland, Tim Koller and Jack Murrin, *Valuation: Measuring and Managing the Value of Companies*, New York, McKinsey & Company, Inc., 3rd Ed., 2000, at 214.

<sup>35</sup> Eugene Brigham and Louis Gapenski, *Financial Management: Theory and Practice*, Orlando, Dryden Press, 1994, at 341.

1 compete in the capital market for the funds needed to maintain its financial  
2 health.<sup>36</sup>

3 Thus, the Commission recognized the importance of considering: (1) the results of each  
4 model presented in the rate case, which included the DCF, CAPM, and Risk Premium  
5 analyses; (2) capital market conditions since changes in market conditions can affect the  
6 model results; and (3) the returns awarded to comparable utilities in other jurisdictions  
7 across the United States.

8 **A. Constant Growth DCF Model**

9 **Q. Please describe the DCF approach.**

10 A. The DCF approach is based on the theory that a stock's current price represents the present  
11 value of all expected future cash flows. In its most general form, the DCF model is  
12 expressed as follows:

13 
$$P_0 = \frac{D_1}{(1+k)} + \frac{D_2}{(1+k)^2} + \dots + \frac{D_\infty}{(1+k)^\infty} \quad [1]$$

14 Where  $P_0$  represents the current stock price,  $D_1 \dots D_\infty$  are all expected future dividends, and  
15  $k$  is the discount rate, or required ROE. Equation [1] is a standard present value calculation  
16 that can be simplified and rearranged into the following form:

17 
$$k = \frac{D_0(1+g)}{P_0} + g \quad [2]$$

---

<sup>36</sup> In re Laclede Gas Co., No. GR-2017-0215, Report and Order at 35 (March 7, 2018).

1 Equation [2] is often referred to as the constant growth DCF model in which the first term  
2 is the expected dividend yield and the second term is the expected long-term growth rate.

3 **Q. What assumptions are required for the constant growth DCF model?**

4 A. The constant growth DCF model requires the following four assumptions: (1) a constant  
5 growth rate for earnings and dividends; (2) a stable dividend payout ratio; (3) a constant  
6 price-to-earnings ratio; and (4) a discount rate greater than the expected growth rate. To  
7 the extent that any of these assumptions are not objectively valid, considered judgment  
8 and/or specific adjustments should be applied to the results.

9 **Q. What market data do you use to calculate the dividend yield in your constant growth  
10 DCF model?**

11 A. The dividend yield in my constant growth DCF model is based on the proxy group  
12 companies' current annual dividend and average closing stock prices over the 30-, 90-, and  
13 180-trading days ended April 30, 2026.

14 **Q. Why do you use these averaging periods?**

15 A. I use an average of recent trading days to calculate the term  $P_0$  in the DCF model to reflect  
16 current market data while also ensuring that the result of the model is not skewed by  
17 anomalous events that may affect stock prices on any given trading day.

1 **Q. Have you made any adjustments to the dividend yield to account for periodic growth**  
2 **in dividends?**

3 A. Yes. Since utility companies tend to increase their quarterly dividends at different times  
4 throughout the year, it is reasonable to assume that dividend increases will be evenly  
5 distributed over calendar quarters. Given that assumption, it is reasonable to apply one-  
6 half of the expected annual dividend growth rate for purposes of calculating the expected  
7 dividend yield component of the DCF model. This adjustment ensures that the expected  
8 first-year dividend yield is, on average, representative of the coming twelve-month period,  
9 and does not overstate the aggregated dividends to be paid during that time.

10 **Q. Why is it important to select appropriate measures of long-term growth in applying**  
11 **the DCF model?**

12 A. In its constant growth form, the DCF model (*i.e.*, Equation [2]) assumes a single growth  
13 estimate in perpetuity. To reduce the long-term growth rate to a single measure, one must  
14 assume that the payout ratio remains constant and that earnings per share (“EPS”),  
15 dividends per share, and book value per share all grow at the same constant rate. However,  
16 over the long run, dividend growth can only be sustained by earnings growth, meaning  
17 earnings are the fundamental driver of a company’s ability to pay dividends. Therefore,  
18 projected EPS growth is the appropriate estimate of a company’s long-term projected  
19 growth. In contrast, changes in a company’s dividend payments are based on management  
20 decisions related to cash management and other factors. For example, a company may  
21 decide to retain earnings rather than pay out a portion of those earnings to shareholders  
22 through dividends. As such, dividend growth rates are less likely than earnings growth

1 rates to accurately reflect investor perceptions of a company's growth prospects.  
2 Accordingly, I have incorporated several sources of long-term EPS growth rates into the  
3 constant growth DCF model.

4 **Q. What sources of long-term EPS growth rates do you use?**

5 A. My constant growth DCF model incorporates three sources of long-term earnings growth  
6 rates: (1) *Zacks Investment Research* ("Zacks"); (2) *S&P Capital IQ*; and (3) *Value Line*.

7 **Q. Have you previously relied on projected EPS growth rates provided by *Yahoo!***  
8 ***Finance*?**

9 A. Yes, however, *Yahoo! Finance* no longer reports consensus projected 3- to 5-year EPS  
10 growth rates. As a result, I have replaced this source with the consensus projected 3- to 5-  
11 year EPS growth rates reported by *S&P Capital IQ*.

12 **Q. How do you calculate the range of results for the constant growth DCF models?**

13 A. I calculate results using the average EPS growth rate from all three sources for each proxy  
14 group company. In addition, I calculate a low-end result for the constant growth DCF  
15 models using the minimum growth rate of the three sources (*i.e.*, the lowest of the *Zacks*,  
16 *S&P Capital IQ*, and *Value Line* projected EPS growth rates) for each of the proxy group  
17 companies, and use a similar approach to calculate a high-end result, using the maximum  
18 growth rate of the three sources for each proxy group company.

1 **Q. What are the results of your DCF analyses?**

2 A. Figure 7 summarizes the results of my DCF analyses, which are also provided in Schedule  
3 AEB-3.

4 **Figure 7: Summary of DCF Results**

	Minimum Growth Rate	Average Growth Rate	Maximum Growth Rate
Constant Growth DCF:			
Mean			
30-Day Avg. Stock Price	10.03%	10.76%	11.43%
90-Day Avg. Stock Price	10.14%	10.87%	11.54%
180-Day Avg. Stock Price	10.23%	10.95%	11.63%
Average	10.13%	10.86%	11.53%
Median			
30-Day Avg. Stock Price	9.74%	10.15%	10.44%
90-Day Avg. Stock Price	9.91%	10.33%	10.56%
180-Day Avg. Stock Price	9.99%	10.41%	10.69%
Average	9.88%	10.30%	10.56%

5  
6 **B. CAPM and ECAPM Analysis**

7 **Q. Please briefly describe the CAPM.**

8 A. The CAPM is a risk premium approach that estimates the cost of equity for a given security  
9 as a function of a risk-free return plus a risk premium to compensate investors for the non-  
10 diversifiable or “systematic” risk of that security.<sup>37</sup> The CAPM is defined by four  
11 components:

---

<sup>37</sup> Systematic risk is the risk inherent in the entire market or market segment, which cannot be diversified away using a portfolio of assets. Unsystematic risk is the risk of a specific company that can, theoretically, be mitigated through portfolio diversification.

1 
$$K_e = r_f + \beta(r_m - r_f) \quad [3]$$

2 Where:

3  $K_e$  = the required return of an individual security

4  $\beta$  = the beta coefficient of an individual security

5  $r_f$  = the risk-free rate of return

6  $r_m$  = the required return on the market as a whole

7 In this specification, the term  $(r_m - r_f)$  represents the market risk premium, which measures  
8 the relative riskiness of the security being evaluated. According to the theory underlying  
9 the CAPM, because unsystematic risk can be diversified away, investors should only be  
10 concerned with systematic or non-diversifiable risk. Non-diversifiable risk is measured by  
11 beta, which is defined as:

$$\beta = \frac{\text{Covariance}(r_e, r_m)}{\text{Variance}(r_m)} \quad [4]$$

12 *Variance* ( $r_m$ ) represents the variance of the market return which is a measure of the  
13 uncertainty of the general market. *Covariance* ( $r_e, r_m$ ) represents the covariance between  
14 the return on a specific security and the general market, which reflects the extent to which  
15 the return on that security will respond to a given change in the general market return.  
16 Thus, beta represents the risk of the security relative to the general market.

17 **Q. What risk-free rate do you use in your CAPM analysis?**

18 A. I use three estimates of the yield on Treasury bonds: (1) the current 30-day average yield  
19 on 30-year Treasury bonds, which is 4.91 percent;<sup>38</sup> (2) the average projected 30-year

---

<sup>38</sup> Bloomberg Professional, as of April 30, 2026.

1 Treasury bond yield for the third quarter of 2026 through the third quarter of 2027, which  
2 is 4.82 percent;<sup>39</sup> and (3) the average projected 30-year Treasury bond yield for 2027  
3 through 2031, which is 4.60 percent.<sup>40</sup>

4 **Q. What beta coefficients do you use in your CAPM analysis?**

5 A. As shown on Schedule AEB-4, I use the average beta coefficients for the proxy group  
6 companies as reported by *Value Line*. The beta coefficients reported by *Value Line* are  
7 calculated based on five years of weekly returns relative to the New York Stock Exchange  
8 Composite Index. Additionally, as shown on Schedule AEB-4 and Schedule AEB-5, I also  
9 consider an additional CAPM analysis that relies on the long-term average beta coefficient  
10 reported by *Value Line* for the companies in my proxy group from 2013 through 2025.

11 **Q. How do you estimate the market risk premium in the CAPM?**

12 A. I estimate the market risk premium as the difference between the implied expected equity  
13 market return and the risk-free rate. As shown on Schedule AEB-6, the expected return is  
14 calculated using the constant growth DCF model discussed previously in my testimony for  
15 the companies in the S&P 500 Index. Based on an estimated market capitalization-  
16 weighted dividend yield of 1.31 percent and a weighted long-term growth rate of 11.89  
17 percent, the estimated required market return for the S&P 500 Index as of April 30, 2026  
18 is 13.28 percent.

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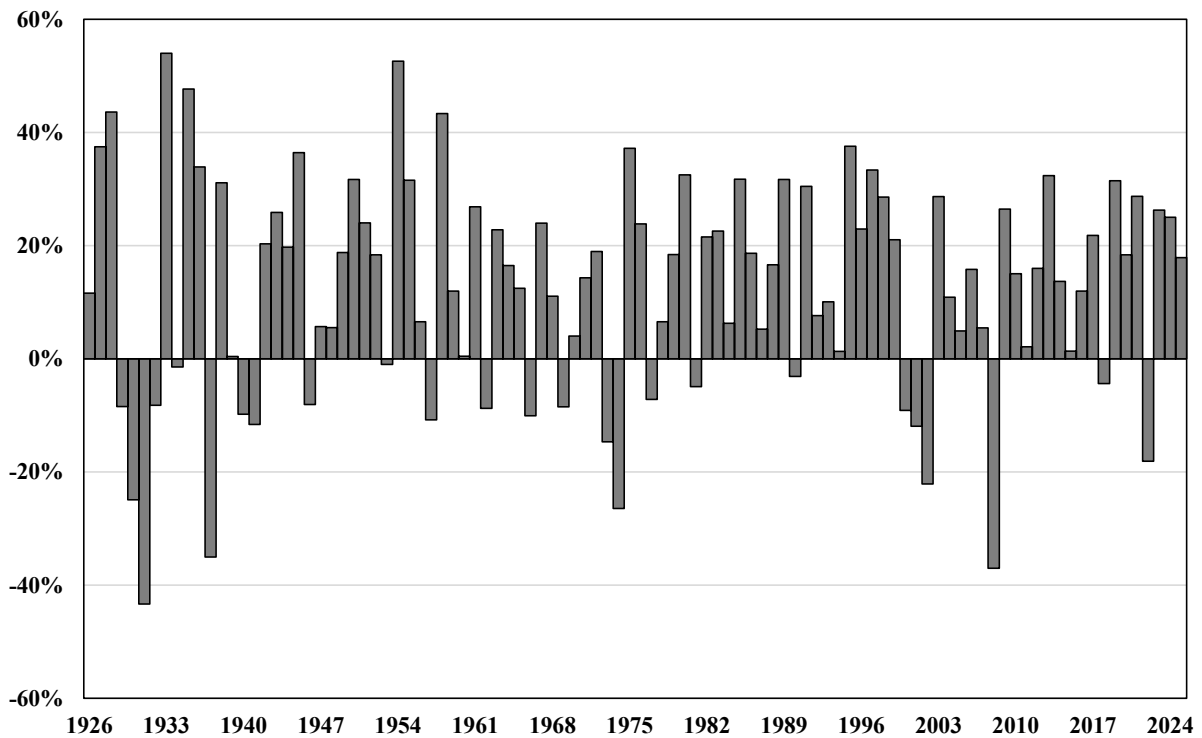
<sup>39</sup> *Blue Chip Financial Forecasts*, Vol. 45, No. 5, May 1, 2026, at 2.

<sup>40</sup> *Blue Chip Financial Forecasts*, Vol. 44, No. 12, December 1, 2025, at 14.

1 **Q. How does the current expected market return compare to observed historical market**  
2 **returns?**

3 A. As shown in Figure 8, given the range of annual equity returns that have been observed  
4 over the past century, the current expected market return is reasonable. In 53 out of the  
5 past 100 years (or 53.00 percent of observations), the realized equity market return was at  
6 least 13.28 percent or greater.

7 **Figure 8: Realized U.S. equity market returns (1926-2025)**<sup>41</sup>



8

---

<sup>41</sup> Depicts total annual returns on large company stocks, as reported in the 2023 *Kroll S&BBI Yearbook* for 1926-2022 and from *S&P Capital IQ Pro* for 2023-2025.

1 **Q. Do you also consider another form of the CAPM in your analysis?**

2 A. Yes. I also consider the results of an ECAPM analysis in estimating the cost of equity.<sup>42</sup>

3 The ECAPM calculates the product of the adjusted beta coefficient and the market risk  
4 premium and applies a weight of 75.00 percent to that result. The model then applies a  
5 25.00 percent weight to the market risk premium without any effect from the beta  
6 coefficient. The results of the two calculations are summed, along with the risk-free rate,  
7 to produce the ECAPM result, as noted in Equation [5] below:

8 
$$k_e = r_f + 0.75\beta(r_m - r_f) + 0.25(r_m - r_f) \quad [5]$$

9 Where:

10  $k_e$  = the required return of an individual security

11  $\beta$  = the adjusted beta coefficient of an individual security

12  $r_f$  = the risk-free rate of return

13  $r_m$  = the required return on the market as a whole

14 The ECAPM addresses the tendency of the “traditional” CAPM to underestimate the cost  
15 of equity for companies with low beta coefficients such as regulated utilities. In that regard,  
16 the ECAPM is not redundant to the use of adjusted betas in the traditional CAPM; rather,  
17 it recognizes the results of academic research indicating that the risk-return relationship is  
18 different (in essence, flatter) than estimated by the CAPM, meaning that the CAPM

---

<sup>42</sup> See, e.g., Roger A. Morin, *New Regulatory Finance*. Public Utilities Reports, Inc., 2006, at 189.



1 **VII. BUSINESS AND REGULATORY RISKS**

2 **Q. Taken alone, do the results from the cost of equity estimation models for the proxy**  
3 **group provide an appropriate estimate of the cost of equity for the Company.**

4 A. No. These results provide only a range for the appropriate estimate of the Company's cost  
5 of equity. There are several additional factors that must be taken into consideration when  
6 determining where the Company's cost of equity falls within the range of results. These  
7 factors, which are discussed below, should be considered with respect to their overall effect  
8 on the Company's risk profile.

9 **A. Capital Expenditures**

10 **Q. Please summarize the Company's capital expenditure requirements.**

11 A. As of December 31, 2025, the Company had net utility plant of approximately \$4.4 billion,  
12 and the Company currently projects capital expenditures for 2026 through 2031 of  
13 approximately \$3.5 billion. Therefore, the Company's projected capital expenditures  
14 represent approximately 80.00 percent of its net utility plant as of December 31, 2025.

15 **Q. How do the Company's capital expenditure requirements compare to those of the**  
16 **proxy group companies?**

17 A. As shown on Schedule AEB-7, I have calculated the ratio of expected capital expenditures  
18 to net utility plant for MAWC and each of the companies in the proxy group. As shown  
19 therein, the Company's ratio of capital expenditures as a percentage of net utility plant is  
20 above the median of the proxy group companies (*i.e.*, 1.36 times), which, all else equal,  
21 indicates greater risk than the companies in the proxy group on average.

1 **Q. How is the Company's risk profile affected by its substantial capital expenditure**  
2 **requirements?**

3 A. As with any utility faced with substantial capital expenditure requirements, the Company's  
4 risk profile may be adversely affected in two significant and related ways: (1) the  
5 heightened level of investment increases the risk of under-recovery or delayed recovery of  
6 the invested capital; and (2) an inadequate return would put downward pressure on key  
7 credit metrics.

8 **Q. Do credit rating agencies recognize the risks associated with elevated levels of capital**  
9 **expenditures?**

10 A. Yes. From a credit perspective, the additional pressure on cash flows associated with high  
11 levels of capital expenditures exerts corresponding pressure on credit metrics and,  
12 therefore, credit ratings. To that point, S&P explains the importance of regulatory support  
13 for large capital projects:

14 When applicable, a jurisdiction's willingness to support large capital  
15 projects with cash during construction is an important aspect of our analysis.  
16 This is especially true when the project represents a major addition to rate  
17 base and entails long lead times and technological risks that make it  
18 susceptible to construction delays. Broad support for all capital spending is  
19 the most credit-sustaining. Support for only specific types of capital  
20 spending, such as specific environmental projects or system integrity plans,  
21 is less so, but still favorable for creditors. Allowance of a cash return on  
22 construction work-in-progress or similar ratemaking methods historically  
23 were extraordinary measures for use in unusual circumstances, but when  
24 construction costs are rising, cash flow support could be crucial to maintain  
25 credit quality through the spending program. Even more favorable are those

1 jurisdictions that present an opportunity for a higher return on capital  
2 projects as an incentive to investors.<sup>44</sup>

3 **Q. Does MAWC have a capital tracking mechanism to recover some of the costs**  
4 **associated with its capital expenditures plan between rate cases?**

5 A. Yes. MAWC has a Water and Sewer Infrastructure Rate Adjustment (“WSIRA”)  
6 surcharge that allows the Company to recover eligible costs associated with replacing,  
7 repairing, and relocating aging water and wastewater infrastructure, such as pipes, meters,  
8 valves, hydrants, service lines, sewer laterals, pumps, mechanical equipment, and system  
9 controls.<sup>45</sup> However, there is a cap on the annual amount of capital costs that can be  
10 recovered through the WSIRA. The annual revenue collected through the WSIRA  
11 (revenue collected through the WSIRA minus the revenue associated with the plant being  
12 replaced) cannot exceed 15.00 percent of MAWC’s total base revenue requirement  
13 approved by the Commission in the Company’s last general rate proceeding.<sup>46</sup> Further,  
14 only a portion of the Company’s total capital expenditures plan is eligible for recovery  
15 through the WSIRA. Therefore, the Company relies on future rate case filings for  
16 authorization to recover the return on and return of its projected capital expenditures, and,  
17 as a result, the WSIRA mitigates but does not eliminate the cost recovery risk associated  
18 with MAWC’s capital expenditure plans.

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<sup>44</sup> S&P Global Ratings, “Assessing U.S. Investor-Owned Utility Regulatory Environments,” August 10, 2016, at 7.

<sup>45</sup> Missouri-American Water Company tariff, Schedule of Rates, Rate W, 11<sup>th</sup> Revised Sheet No. RT 11.1, effective March 1, 2026.

<sup>46</sup> In the Matter of the Petition of Missouri –American Water Company for Approval to Establish a Water and Sewer Infrastructure Rate Adjustment (“WSIRA”), Order Approving Water and Sewer Infrastructure Rate Adjustments, Missouri Public Service Commission, File No. WO-2021-0428, January 12, 2022, at 4; Mo. Rev. Stat. § 393.1506.1 (2025).

1 **Q. Does the WSIRA reduce MAWC's cost of equity?**

2 A. No. It is important to recognize that the estimation of the cost of equity includes a  
3 comparative analysis of the risks and returns of the subject company and the proxy group  
4 of publicly traded utilities that are relied on in the cost of equity estimation models,  
5 including their utility operating subsidiaries. Therefore, the threshold question is not  
6 whether this mechanism unto itself reduces the risk of MAWC, but rather whether  
7 MAWC's risk is reduced below that of the proxy group on the basis of having the WSIRA.  
8 As shown in Schedule AEB-8, the majority of the operating utilities of the proxy group  
9 companies (*i.e.*, 75.00 percent) also have some form of a capital cost recovery mechanism.  
10 Thus, MAWC is similar to the proxy group with respect to the recovery of capital  
11 investments, and the WSIRA does not reduce the Company's regulatory risk relative to its  
12 peers, but rather, the implementation of WSIRA means the Company's risk profile is more  
13 consistent with the operating utilities of the proxy group companies. As noted, it is also  
14 important to recognize that it remains subject to an annual cap and thus could limit the  
15 recovery of capital on a forward-looking basis.

16 **Q. What are your conclusions regarding the effect of the Company's capital spending**  
17 **requirements on its risk profile and cost of capital?**

18 A. As noted, the Company's capital expenditure requirements as a percentage of net utility  
19 plant are significant relative to the proxy group and will continue over the next several  
20 years. Although MAWC has WSIRA to recover certain qualifying capital costs, this  
21 mechanism does not provide for timely recovery of all of the Company's capital  
22 expenditures between rate cases. As a result, all else equal, the Company has relatively

1 greater risk of timely cost recovery and earnings potential relative to the proxy group  
2 companies.

3 **B. Earned ROE**

4 **Q. Is there evidence that MAWC has been unable to earn its authorized return on**  
5 **equity?**

6 A. Yes. As shown in Figure 10, MAWC has persistently failed to earn its authorized ROE in  
7 each year since 2015. Over this period, the Company's average earned ROE generally has  
8 been between 100 and 200 basis points below the Company's authorized ROE. This under-  
9 earning is due in part to the regulatory environment in Missouri, which is discussed in the  
10 following section. The prior under earning highlights the importance of a constructive  
11 outcome in the current proceeding so that MAWC has a reasonable opportunity to earn its  
12 authorized ROE.

13

1

**Figure 10: Earned vs. Authorized ROE**

	<b>Earned ROE</b>	<b>Authorized ROE</b>	<b>Earnings Differential (BPS)</b>
<b>2025</b>	8.07%	9.75 <sup>47</sup>	(168)
<b>2024</b>	7.85%	9.75 <sup>48</sup>	(190)
<b>2023</b>	8.72%	9.75% <sup>49</sup>	(103)
<b>2022</b>	8.72%	9.55%	(83)
<b>2021</b>	7.46%	9.55% <sup>50</sup>	(209)
<b>2020</b>	8.03%	9.75%	(172)
<b>2019</b>	8.57%	9.75%	(118)
<b>2018</b>	8.42%	9.75%	(133)
<b>2017</b>	7.67%	9.50-10.00% <sup>51</sup>	(183-233)
<b>2016</b>	8.71%	9.75%	(104)
<b>2015</b>	7.95%	9.75% <sup>52</sup>	(180)

2

3 **C. Regulatory Risk**

4 **Q. How does the regulatory environment affect investors' risk assessments?**

5 A. The ratemaking process is premised on the principle that, for investors and companies to  
6 commit the capital needed to provide safe and reliable utility service to customers, the

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<sup>47</sup> From AWK 2026 First Quarter Earnings Conference Call, April 30, 2026, "The listed ROE is the Company's view of the ROE allowed in the case; the ROE was not disclosed in the Order or the applicable settlement agreement," at 35.

<sup>48</sup> *Id.*

<sup>49</sup> From AWK Investor Day Presentation, March 2024, "The ROE is the Company's view of the ROE allowed in the case; however, the ROE was not disclosed in the Order or the applicable settlement agreement," at 37.

<sup>50</sup> From AWK Fall 2021 Investor Day Presentation, November 2021, "The ROE is the Company's view of the ROE allowed in the case; however, the ROE was not disclosed in the Order or the applicable settlement agreement," at 60.

<sup>51</sup> Docket No. WR-2017-0285, Stipulation and Agreement, at 3.

<sup>52</sup> Docket No. WR-2015- 0301, at 3.

1 subject utility must have the opportunity to recover the return of, and the market-required  
2 return on, invested capital. Regulatory authorities recognize that because utility operations  
3 are capital-intensive, regulatory decisions should enable the utility to attract capital on  
4 reasonable terms, and doing so balances the long-term interests of investors and customers.  
5 To achieve this balance, the Company must be able to finance its operations assuming a  
6 reasonable opportunity to earn an appropriate return on invested capital to maintain an  
7 acceptable financial profile. In that respect, the regulatory environment is one of the most  
8 important factors considered in both debt and equity investors' risk assessments.

9 From the perspective of debt investors, the authorized return should enable the utility to  
10 generate the cash flow needed to meet its near-term financial obligations, make the capital  
11 investments needed to maintain and expand its systems, and maintain the necessary levels  
12 of liquidity to fund unexpected events. This financial liquidity must be derived not only  
13 from internally generated funds, but also by efficient access to capital markets. Moreover,  
14 because fixed income investors have many investment alternatives, even within a given  
15 market sector, the utility's financial profile must be adequate on a relative basis to ensure  
16 its ability to attract capital under a variety of economic and financial market conditions.

17 In addition, equity investors require that the authorized return be adequate to provide a  
18 risk-comparable return on the equity portion of the utility's capital investments. Because  
19 equity investors are the residual claimants on the utility's cash flows (which is to say that  
20 the equity return is subordinate to interest payments), they are particularly concerned with  
21 the strength of regulatory support and its effect on future cash flows.

1 **Q. Do credit rating agencies consider regulatory risk in establishing a company’s credit**  
2 **rating?**

3 A. Yes. Both S&P and Moody’s consider the overall regulatory framework in establishing  
4 credit ratings. Moody’s establishes credit ratings based on four key factors: (1) business  
5 profile; (2) financial policy; (3) leverage and coverage; and (4) uplift for structural  
6 considerations. Within the business profile criteria, stability and predictability of  
7 regulatory environment and cost and investment recovery (sufficiency and timeliness) are  
8 each given a broad rating factor of 15.00 percent, while revenue risk is given a rating factor  
9 of 5.00 percent. Therefore, Moody’s assigns regulatory risk a 35.00 percent weighting in  
10 the overall assessment of business and financial risk for regulated utilities.<sup>53</sup>

11 S&P also identifies the regulatory framework as an important factor in credit ratings for  
12 regulated utilities, stating: “we assess regulatory advantage because the influence of the  
13 regulatory framework and regime is of critical importance. It defines the environment in  
14 which a utility operates and has a significant bearing on a utility’s financial performance.”<sup>54</sup>  
15 S&P identifies four specific factors that it uses to assess the credit implications of the  
16 regulatory jurisdictions of investor-owned regulated utilities: (1) regulatory stability; (2)  
17 tariff-setting procedures and design; (3) financial stability; and (4) regulatory independence  
18 and insulation.<sup>55</sup>

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<sup>53</sup> Moody’s Investors Service, *Rating Methodology: Regulated Water Utilities*, August 18, 2023, at 3.

<sup>54</sup> Standard & Poor’s Global Ratings, “Sector-Specific Corporate Methodology,” April 4, 2024, at 147.

<sup>55</sup> *Id.*

1 **Q. How does the regulatory environment in which a utility operates affect its access to**  
2 **and cost of capital?**

3 A. The regulatory environment can significantly affect both the access to, and cost of capital  
4 in several ways. First, the proportion and cost of debt capital available to utility companies  
5 are influenced by the rating agencies' assessment of the regulatory environment. As noted  
6 by Moody's, "the characteristics and transparency of the concession(s) and regulations  
7 under which the utility operates, the track record of the regulatory regime in setting tariffs  
8 and applying regulations consistently are key elements in assessing the overall stability of  
9 a water utility's business profile."<sup>56</sup>

10 **Q. Have you conducted any analysis of the risk associated with the regulatory**  
11 **framework in Missouri relative to the jurisdictions in which the utility operating**  
12 **subsidiaries of the companies in your proxy group operate?**

13 A. Yes. I have evaluated the regulatory framework in Missouri considering three factors that  
14 are important in terms of providing a regulated utility a reasonable opportunity to earn its  
15 authorized ROE: (1) the test year convention (*i.e.*, forecast vs. historical) for ratemaking;  
16 (2) the use of rate design or other mechanisms that mitigate volumetric risk and stabilize  
17 revenue; and (3) the ability to recover capital costs between rate cases. The results of this  
18 regulatory risk assessment are shown on Schedule AEB-8 and are summarized below

19 

- Test Year Convention: MAWC has relied on a historic test year in the past with  
20 limited changes through a true-up period.<sup>57</sup> In this proceeding, the Company is

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<sup>56</sup> Moody's Investors Service, Rating Methodology: Regulated Water Utilities, June 8, 2018, at 7.

<sup>57</sup> Missouri Public Service Commission, File No. WR-2024-0320, Report and Order, May 7, 2025, at 14.

1 proposing a future test year ending May 31, 2028. A future test year is consistent  
2 with operating subsidiaries of the proxy group companies, as 55 percent of the  
3 utility operating subsidiaries of the proxy group companies use a partially or fully  
4 forecast test year. Forecasted test years have been relied on in many jurisdictions  
5 for years and produce cost estimates that are more reflective of future costs, which  
6 results in more accurate recovery of incurred costs and mitigates the regulatory lag  
7 associated with historical test years.

- 8 • Revenue Stabilization/Volumetric Risk: The Company does not currently have  
9 protection against volumetric risk; however, it is proposing to implement a Revenue  
10 Stabilization Mechanism (“RSM”) in this proceeding. The RSM would reconcile  
11 actual revenue for water customers in the residential, commercial, OPA and sale  
12 for resale classes with the revenue the Commission authorizes (i.e., “Authorized  
13 Revenues”) the Company to collect in rates.<sup>58</sup> This mechanism excludes revenues  
14 authorized and collected through the WSIRA.

15 Approximately 68 percent of the utility operating subsidiaries of the proxy group  
16 companies have some form of protection against volumetric risk or revenue  
17 stabilization. Therefore, absent the approval of the RSM or similar type of  
18 mechanism, MAWC would face greater risk relative to the proxy group given that  
19 the majority of the utility operating subsidiaries of the proxy group companies have  
20 some form of revenue stabilization that allow them to break the link between  
21 customer usage and revenues.

- 22 • Capital Cost Recovery: As noted previously, MAWC has the WSIRA mechanism  
23 to recover eligible infrastructure costs, and similarly, 75.00 percent of the utility  
24 operating subsidiaries of the proxy group companies also have some form of capital  
25 cost recovery between rate cases in place.

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<sup>58</sup> Please see generally the Direct Testimony of Max McClellan at 60-74.

1 **Q. Have you developed any additional analyses to evaluate the regulatory environment**  
2 **in Missouri as compared to the jurisdictions in which the companies in your proxy**  
3 **group operate?**

4 A. Yes. I have conducted two additional analyses to compare the regulatory framework of  
5 Missouri to the jurisdictions in which the companies in the proxy group operate.  
6 Specifically, I consider two different rankings: (1) the RRA ranking of regulatory  
7 jurisdictions; and (2) S&P’s ranking of the credit supportiveness of regulatory jurisdictions.

8 **Q. How does RRA evaluate the regulatory environment in each jurisdiction?**

9 A. RRA evaluates the regulatory environment from an investor perspective, considering the  
10 relative regulatory risk associated with ownership of securities issued by the companies  
11 that are regulated in each jurisdiction. RRA considers multiple factors that affect the  
12 regulatory process including state regulatory commission decisions, the impact of actions  
13 taken by the governor, the legislature, the courts, and consumer advocacy groups, and  
14 numerous factors regarding the ratemaking environment within the jurisdiction.<sup>59</sup>

15 **Q. How do you use the RRA ratings to compare the regulatory jurisdictions of the proxy**  
16 **group companies with MAWC’s regulatory jurisdiction?**

17 A. RRA assigns a ranking for each regulatory jurisdiction as “Above Average”, “Average”,  
18 or “Below Average”, and then within each of those categories, a numeric ranking from 1  
19 to 3. Thus, there are a total of nine RRA rankings, with the rankings for each jurisdiction  
20 ranging from “Above Average/1”, which is considered the most supportive, to “Below

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<sup>59</sup> S&P Global Market Intelligence, “RRA State Regulatory Evaluations – Energy,” July 2025.

1 Average/3,” which is the least supportive. I have applied a numeric ranking system to the  
2 RRA rankings with “Above Average/1” assigned the highest ranking (*i.e.*, a “1”) and  
3 “Below Average/3” assigned the lowest ranking (*i.e.*, a “9”).

4 **Q. What are the results of this RRA jurisdictional ratings comparison?**

5 A. As shown on Schedule AEB-9, the Missouri jurisdictional ranking is “Average / 2” (*i.e.*, a  
6 “5.0”), which is in line with the proxy group average ranking of between “Average / 2”  
7 and “Average / 3” (*i.e.*, a “5.03”).

8 **Q. How have you conducted your analysis of the S&P credit supportiveness rankings?**

9 A. For credit supportiveness, S&P classifies each regulatory jurisdiction into five categories  
10 that range from “Most Credit Supportive” down to “Credit Supportive.” My comparison  
11 of the credit supportiveness of MAWC’s regulatory jurisdiction to those in which the proxy  
12 companies operate is similar to the analysis of the RRA overall regulatory ranking just  
13 discussed. I assign a numerical ranking to each category, from “Most Credit Supportive”  
14 (“1”) to “Credit Supportive” (“5”).

15 **Q. What are the results of this S&P credit supportiveness comparison?**

16 A. As shown on Schedule AEB-10, the Missouri jurisdictional classification of “Highly Credit  
17 Supportive” (*i.e.*, a “2.00”) is slightly higher the proxy group average ranking, which is  
18 classified between “Highly Credit Supportive” and “Very Credit Supportive” (*i.e.*, a  
19 “2.78”).

1 **Q. What are your conclusions regarding the regulatory risks related to the Missouri**  
2 **regulatory environment?**

3 A. Both Moody's and S&P have identified the supportiveness of the regulatory environment  
4 as an important consideration in developing their overall credit ratings for regulated  
5 utilities. Considering the Company's ability to timely recover its prudently incurred costs  
6 is limited compared with the operating utilities of the proxy group, it has persistently earned  
7 substantially less than its authorized ROE over the past decade, and the RRA jurisdictional  
8 and S&P credit supportiveness rankings, MAWC has above average business and  
9 regulatory risk as compared to the proxy group companies.

10 **D. Flotation Costs**

11 **Q. What are flotation costs?**

12 A. Flotation costs are the costs associated with the sale of new issues of common stock. These  
13 costs include out-of-pocket expenditures for preparation, filing, underwriting, and other  
14 issuance costs.

15 **Q. Why is it important to consider flotation costs in the allowed ROE?**

16 A. A regulated utility must have the opportunity to earn an ROE that is both competitive and  
17 compensatory to attract and retain new investors. To the extent that a company is denied  
18 the opportunity to recover prudently incurred flotation costs, actual returns will fall short  
19 of expected (or required) returns, thereby diluting equity share value.

1 **Q. Are flotation costs part of the utility’s invested costs or part of the utility’s expenses?**

2 A. Yes. Flotation costs are part of the invested costs of the utility, which are properly reflected  
3 on the balance sheet under “paid in capital.” They are not current expenses, and, therefore,  
4 are not reflected on the income statement. Rather, like investments in rate base or the  
5 issuance costs of long-term debt, flotation costs are incurred over time. As a result, the  
6 great majority of a utility’s flotation cost is incurred prior to the test year but remains part  
7 of the cost structure that exists during the test year and beyond, and as such, should be  
8 recognized for ratemaking purposes. Therefore, it is irrelevant whether an issuance occurs  
9 during the test year or is planned for the test year because failure to allow recovery of past  
10 flotation costs may deny MAWC the opportunity to earn its required rate of return in the  
11 future.

12 **Q. Can you provide an example of why a flotation cost adjustment is necessary to**  
13 **compensate investors for the capital they have invested?**

14 A. Yes. For example, as shown in Schedule AEB-11, AWK’s 2025 stock issuance was  
15 \$142.00 per share of common stock. After paying flotation costs associated with the equity  
16 issuance, which included fees paid to underwriters and attorneys, among others, AWK’s  
17 net proceeds were only \$139.54 per share invested. AWK invests that \$139.54 per share  
18 in plant used to serve its customers, which becomes part of the invested capital of the  
19 company. Absent a flotation cost adjustment, the investor will thereafter earn a return on  
20 only the \$139.54 per share of invested capital, even though the investor’s contribution was  
21 \$142.00. Making a small flotation cost adjustment gives the investor a reasonable

1 opportunity to earn the authorized return, rather than the lower return that results when the  
2 authorized return is applied to an amount less than what the investor contributed.

3 **Q. Is the need to consider flotation costs eliminated because MAWC is a wholly-owned**  
4 **subsidiary of AWK?**

5 A. No. Although MAWC is a wholly-owned subsidiary of AWK, it is appropriate to consider  
6 flotation costs because wholly-owned subsidiaries receive equity capital from their parent  
7 and provide returns on the capital that roll up to the parent, which is designated to attract  
8 and raise capital based upon the returns of those subsidiaries. To deny recovery of issuance  
9 costs associated with the capital that is invested in the subsidiaries ultimately penalizes the  
10 investors that fund the utility operations and could inhibit the utility's ability to obtain new  
11 equity capital at a reasonable cost.

12 **Q. Is the need to consider flotation costs recognized by the academic and financial**  
13 **communities?**

14 A. Yes. The need to reimburse shareholders for the lost returns associated with equity  
15 issuance costs is recognized by the academic and financial communities in the same spirit  
16 that investors are reimbursed for the costs of issuing debt. This treatment is consistent with  
17 the philosophy of a fair rate of return. According to Dr. Shannon Pratt:

18 Flotation costs occur when new issues of stock or debt are sold to the public.  
19 The firm usually incurs several kinds of flotation or transaction costs, which  
20 reduce the actual proceeds received by the firm. Some of these are direct  
21 out-of-pocket outlays, such as fees paid to underwriters, legal expenses, and  
22 prospectus preparation costs. Because of this reduction in proceeds, the  
23 firm's required returns on these proceeds equate to a higher return to  
24 compensate for the additional costs. Flotation costs can be accounted for

1           either by amortizing the cost, thus reducing the cash flow to discount, or by  
2           incorporating the cost into the cost of capital. Because flotation costs are  
3           not typically applied to operating cash flow, one must incorporate them into  
4           the cost of capital.<sup>60</sup>

5   **Q.    How did you calculate the flotation costs for MAWC?**

6   A.    My flotation cost calculation is based on the average costs incurred by AWK in its two  
7           most recent equity offerings on February 28, 2023, and August 4, 2025. That flotation cost  
8           percentage is then applied to the proxy group in the DCF analysis to estimate the impact  
9           on the cost of equity associated with flotation costs. As shown in Schedule AEB-11, based  
10          on the flotation costs incurred in the most recent AWK issuance, the impact on the proxy  
11          group's cost of equity amounts to 5 basis points (*i.e.*, 0.05 percent) based on the median.

12 **Q.    Do your final results include an adjustment for flotation cost recovery?**

13 A.    No, I do not make an explicit adjustment for flotation costs to any of the quantitative results  
14          of my cost of equity models. Rather, I consider the incremental cost associated with stock  
15          issuance as part of my overall recommendations regarding the range of reasonable ROEs  
16          and ultimate recommended ROE.

## 17 **VIII. CAPITAL STRUCTURE**

18 **Q.    Is the capital structure of the Company an important consideration in the**  
19 **determination of the appropriate ROE?**

20 A.    Yes. The equity ratio is the primary indicator of financial risk for a regulated utility such  
21          as the Company. All else equal, a higher debt ratio increases the risk to equity investors.

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<sup>60</sup> Shannon P. Pratt, *Cost of Capital Estimation and Applications* (2<sup>nd</sup> ed. 2002), at 220-221.

1 For debt holders, higher debt ratios result in a greater portion of the available cash flow  
2 being required to meet debt service, thereby increasing the risk associated with the  
3 payments on debt. The result of increased risk is a higher interest rate. The incremental  
4 risk of a higher debt ratio is more significant for common equity shareholders, whose claim  
5 on the cash flow of the Company is secondary to debt holders. Therefore, the greater the  
6 debt service requirement, the less cash flow is available for common equity holders.

7 **Q. What is the Company's proposed capital structure?**

8 A. As is discussed in the Direct Testimony of Company witness Nicholas F. Furia, the  
9 Company proposes to establish a projected capital structure that consists of 50.34 percent  
10 common equity and 49.66 percent long-term debt.

11 **Q. Have you analyzed whether this requested equity ratio is reasonable?**

12 A. Yes. I have compared the Company's proposed capital structure relative to the actual  
13 capital structures of the utility operating subsidiaries of the companies in the proxy group.  
14 The cost of equity is estimated based on the return that is derived from companies in the  
15 proxy group that are deemed to be comparable in risk to the Company; however, those  
16 companies must be publicly traded to apply the cost of equity models. The operating utility  
17 subsidiaries of the proxy group companies are most risk-comparable to the Company, and  
18 thus it is important to look to the average capital structure of the operating utilities of the  
19 proxy group to benchmark the equity ratios for the Company.

20 Specifically, I have calculated the average proportion of common equity, long-term debt,  
21 and preferred equity for the most recent three years for each of the utility operating

1 subsidiaries of the proxy group companies. As shown on Schedule AEB-12, the common  
2 equity ratio for the operating subsidiaries of the proxy group companies over the past three  
3 years ranged from 46.51 percent to 68.27 percent, with an average of 56.15 percent. As  
4 such, MAWC's proposed equity ratio of is well within the range of equity ratios of the  
5 utility operating subsidiaries of the proxy group, and, in fact, significantly lower than the  
6 average of the proxy group.

7 **Q. Is the Company's proposed capital structure reflective of the way the Company is**  
8 **operated and consistent with industry norms?**

9 A. Yes, it is for several reasons. Most importantly, the Company's proposed forecasted test-  
10 year capital structure as of May 31, 2028 reflects the projected financing of MAWC's rate  
11 base assets and operating costs.<sup>61</sup>

12 **Q. Are there other factors to be considered in setting the Company's capital structure?**

13 A. Yes, namely the challenges that the credit rating agencies have highlighted as placing  
14 pressure on the credit metrics for utilities.

15 For example, Moody's recently maintained its "stable" outlook for 2026 for the regulated  
16 gas and electric utilities sector based on the expectation of continued regulatory support in  
17 "most states."<sup>62</sup> Moody's makes clear that constructive regulatory outcomes that promote  
18 timely cost recovery is the key factor in supporting utility credit quality as Moody's has

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<sup>61</sup> Direct Testimony of Nicholas Furia.

<sup>62</sup> Moody's Investors Service, Outlook. "Outlook Stable; supportive regulation to offset modestly negative macro factors." October 31, 2025.

1 identified that utilities could be exposed to a number of credit negative factors over the  
2 next 12 to 18 months. Specifically, Moody’s noted the following factors: (1)  
3 macroeconomic factors are expected to be modestly credit negative due to upward pressure  
4 on natural gas prices and elevated inflation; and (2) increased power demand due to “the  
5 development of new data centers, electrification of transportation and buildings,  
6 manufacturing customers and underlying population growth” will increase power prices  
7 which when coupled with inflation and elevated capital spending increases utilities’  
8 exposure to affordability concerns.<sup>63</sup>

9 S&P states that after five years of downgrades outpacing upgrades, in 2025, upgrades  
10 outpaced downgrades and the percentage of companies with a negative outlook declined,  
11 which S&P noted pointed to a “more stable environment for credit quality in 2026.”<sup>64</sup>  
12 However, S&P expects the industry to have increased cash flow deficits as a result of  
13 significant capital spending, which must be funded with both debt and equity to maintain  
14 credit quality.<sup>65</sup> Therefore, S&P notes that the utility industry will need ongoing access to  
15 capital markets to fund the significant capital expenditures. S&P also notes that credit  
16 quality will depend on the ability of utilities to manage regulatory risk and achieve fair rate  
17 case orders. Finally, while S&P’s base case results in a stable outlook for the utility sector,  
18 S&P states that about 40 percent of the industry has “minimal financial cushion” from the

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<sup>63</sup> *Id.*

<sup>64</sup> S&P Global Ratings. Industry Credit Outlook 2026, “North American Regulated Utilities: Data center growth will support credit quality in 2026,” January 14, 2026.

<sup>65</sup> *Id.*

1           downgrade threshold and therefore would have limited ability to absorb any unexpected  
2           events outside of what is assumed in S&P’s base case.<sup>66</sup>

3           Fitch Ratings (“Fitch”) maintains a “neutral” outlook for the utility industry in 2026 noting  
4           that the stable outlook was supported by growth in sales related to data centers and a  
5           “generally benign” regulatory environment for utilities.<sup>67</sup> However, while Fitch views load  
6           growth as a “positive development” because the growth is related to data centers, it raises  
7           longer-term uncertainty related to “rate design, customer concentration, and technology  
8           risks”.<sup>68</sup> Further, Fitch states that capital expenditures for the industry will continue to “set  
9           records” in order to meet the growing demand and to enhance reliability and  
10          modernization. The record capital expenditures will require a balanced regulatory  
11          environment to facilitate cost recovery in a credit supportive manner.<sup>69</sup>

12          The continued concerns of the credit rating agencies over increased capital expenditures  
13          underscore the importance of maintaining adequate cash flow metrics for the Company in  
14          the context of this proceeding. A reasonable capital structure is key to maintaining  
15          supportive cash flow.

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<sup>66</sup> *Id.*

<sup>67</sup> Fitch Ratings, “North American Utilities & Power Outlook 2026,” December 9, 2025, at 1

<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

1 **Q. Will the capital structure and ROE authorized in this proceeding affect the**  
2 **Company's access to capital at reasonable rates?**

3 A. Yes. Because a utility's investment horizon is very long, investors require the assurance  
4 of a sufficiently high return to satisfy the long-run financing requirements of the assets  
5 placed into service. Those assurances, which often are measured by the relationship  
6 between internally generated cash flows and debt (or interest expense), depend quite  
7 heavily on the capital structure. Consequently, both the ROE and capital structure are very  
8 important to debt and equity investors, particularly given the capital market conditions  
9 discussed previously.

10 **IX. CONCLUSIONS AND RECOMMENDATIONS**

11 **Q. What is your conclusion regarding a reasonable and appropriate ROE for MAWC?**

12 A. Figure 11 summarizes the results of my cost of equity analyses. Based on these results, the  
13 qualitative analyses presented in my direct testimony, the business and financial risks of  
14 MAWC as compared to the proxy group, and current and prospective conditions in capital  
15 markets, a reasonable range for MAWC's ROE in this proceeding is from 10.25 percent to  
16 11.25 percent, and within that range, an ROE of 10.50 percent reasonably reflects the  
17 investor-required return.

1

**Figure 11: Summary of Analytical Results**

	Minimum Growth Rate	Average Growth Rate	Maximum Growth Rate
Constant Growth DCF:			
Mean			
30-Day Avg. Stock Price	10.03%	10.76%	11.43%
90-Day Avg. Stock Price	10.14%	10.87%	11.54%
180-Day Avg. Stock Price	10.23%	10.95%	11.63%
Average	10.13%	10.86%	11.53%
Median			
30-Day Avg. Stock Price	9.74%	10.15%	10.44%
90-Day Avg. Stock Price	9.91%	10.33%	10.56%
180-Day Avg. Stock Price	9.99%	10.41%	10.69%
Average	9.88%	10.30%	10.56%
30-Year Treasury Bond Yield			
	Current 30-Day Avg	Near-Term Projected	Longer-Term Projected
CAPM:			
Current <i>Value Line</i> Beta	11.44%	11.42%	11.37%
Long-term Avg. <i>Value Line</i> Beta	11.19%	11.16%	11.11%
ECAPM:			
Current <i>Value Line</i> Beta	11.90%	11.88%	11.85%
Long-term Avg. <i>Value Line</i> Beta	11.71%	11.69%	11.65%

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3 **Q. What is your conclusion with respect to MAWC'S proposed capital structure?**

4 A. MAWC's proposal to establish a capital structure consisting of 50.34 percent common  
5 equity is reasonable as the proposed equity ratio is well within the range, and significantly  
6 below the mean, of the actual capital structures of the utility operating subsidiaries of the  
7 proxy companies.

1 Q. **Does this conclude your direct testimony?**

2 A. Yes, it does.



# Ann E. Bulkley

## PRINCIPAL

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Boston

508.981.0866

[Ann.Bulkley@brattle.com](mailto:Ann.Bulkley@brattle.com)

With more than 30 years of experience in the energy industry, Ms. Bulkley specializes in regulatory economics for the electric and natural gas and water utility sectors, including valuation of regulated and unregulated utility assets, cost of capital, and capital structure issues.

Ms. Bulkley has extensive state and federal regulatory experience, and she has provided expert testimony on the cost of capital in more than 100 regulatory proceedings before 32 state regulatory commissions and the Federal Energy Regulatory Commission (FERC).

In addition to her regulatory experience, Ms. Bulkley has provided valuation and appraisal services for a variety of purposes, including the sale or acquisition of utility assets, regulated ratemaking, ad valorem tax disputes, and other litigation purposes. In addition, she has experience in the areas of contract and business unit valuation, strategic alliances, market restructuring, and regulatory and litigation support.

Ms. Bulkley is a Certified General Appraiser licensed in the Commonwealth of Massachusetts and the State of New Hampshire.

Prior to joining Brattle, Ms. Bulkley was a Senior Vice President at an economic consultancy and held senior positions at several other consulting firms.

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### AREAS OF EXPERTISE

- Regulatory Economics, Finance & Rates
- Regulatory Investigations & Enforcement
- Tax Controversy & Transfer Pricing
- Electricity Litigation & Regulatory Disputes
- M&A Litigation

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EDUCATION

- **Boston University**  
MA in Economics
- **Simmons College**  
BA in Economics and Finance

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PROFESSIONAL EXPERIENCE

- **The Brattle Group (2022–Present)**  
Principal
- **Concentric Energy Advisors, Inc. (2002–2021)**  
Senior Vice President  
Vice President  
Assistant Vice President  
Project Manager
- **Navigant Consulting, Inc. (1997–2002)**  
Project Manager
- **Reed Consulting Group (1995-1997)**  
Consultant- Project Manager
- **Cahners Publishing Company (1995)**  
Economist

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SELECTED CONSULTING EXPERIENCE & EXPERT TESTIMONY

**REGULATORY ANALYSIS AND RATEMAKING**

Have provided a range of advisory services relating to regulatory policy analysis and many aspects of utility ratemaking, with specific services including:

- Cost of capital and return on equity testimony, cost of service and rate design analysis and testimony, development of ratemaking strategies
- Development of merchant function exit strategies

- Analysis and program development to address residual energy supply and/or provider of last resort obligations
- Stranded costs assessment and recovery  
Performance-based ratemaking analysis and design
- Many aspects of traditional utility ratemaking (e.g., rate design, rate base valuation)

#### **COST OF CAPITAL**

Have provided expert testimony on the cost of capital and capital structure in nearly 100 regulatory proceedings before state and federal regulatory commissions in the United States.

#### **RATEMAKING**

Have assisted several clients with analysis to support investor-owned and municipal utility clients in the preparation of rate cases. Sample engagements include:

- Assisted several investor-owned and municipal clients on cost allocation and rate design issues including the development of expert testimony supporting recommended rate alternatives.
- Worked with Canadian regulatory staff to establish filing requirements for a rate review of a newly regulated electric utility. Along with analyzing and evaluating rate application, attended hearings and conducted investigation of rate application for regulatory staff and prepared, supported, and defended recommendations for revenue requirements and rates for the company. Additionally, developed rates for gas utility for transportation program and ancillary services.

#### **VALUATION**

Have provided valuation services to utility clients, unregulated generators, and private equity clients for a variety of purposes, including ratemaking, fair value, ad valorem tax, litigation and damages, and acquisition. Appraisal practices are consistent with the national standards established by the Uniform Standards of Professional Appraisal Practice.

Representative projects/clients have included:

- Prepared appraisals of electric utility transmission and distribution assets for ad valorem tax purposes.
- Prepared appraisals of hydroelectric generating facilities for ad valorem tax purposes.
- Conducted appraisals of fossil fuel generating facilities for ad valorem tax purposes.
- Conducted appraisals of generating assets for the purposes of unwinding sale-leaseback agreements.
- For a confidential utility client, prepared valuation of fossil and nuclear generation assets for financing purposes for regulated utility client.

- Conducted a strategic review of the acquisition of nuclear generation assets. Review included the evaluation of the operating costs of the facilities and the long-term liabilities associated with the assets including the decommissioning of the assets.
- Prepared a valuation of a portfolio of generation assets for a large energy utility to be used for strategic planning purposes. Valuation approach included an income approach, a real options analysis, and a risk analysis.
- Assisted clients in the restructuring of NUG contracts through the valuation of the underlying assets. Performed analysis to determine the option value of a plant in a competitively priced electricity market following the settlement of the NUG contract.
- Prepared market valuations of several purchase power contracts for large electric utilities in the sale of purchase power contracts. Assignment included an assessment of the regional power market, analysis of the underlying purchase power contracts, and a traditional discounted cash flow valuation approach, as well as a risk analysis. Analyzed bids from potential acquirers using income and risk analysis approached. Prepared an assessment of the credit issues and value at risk for the selling utility.
- Prepared appraisal of a portfolio of generating facilities for a large electric utility to be used for financing purposes.
- Conducted a valuation of regulated utility assets for the fair value rate base estimate used in electric rate proceedings in Indiana.
- Prepared an appraisal of a fleet of fossil generating assets for a large electric utility to establish the value of assets transferred from utility property.
- Conducted due diligence on an electric transmission and distribution system as part of a buy-side due diligence team.
- Provided analytical support and prepared testimony regarding the valuation of electric distribution system assets in five communities in a condemnation proceeding.
- Prepared feasibility reports analyzing the expected net benefits resulting from municipal ownership of investor-owned utility operations.
- Prepared independent analyses of proposal for the proposed government condemnation of the investor-owned utilities in Maine and the formation of a public power district.
- Valued purchase power agreements in the transfer of assets to a deregulated electric market.

### **STRATEGIC AND FINANCIAL ADVISORY SERVICES**

Have assisted several clients across North America with analytically-based strategic planning, due diligence, and financial advisory services.

Representative projects include:



- Preparation of feasibility studies for bond issuances for municipal and district steam clients.
- Assisted in the development of a generation strategy for an electric utility. Analyzed various NERC regions to identify potential market entry points. Evaluated potential competitors and alliance partners. Assisted in the development of gas and electric price forecasts. Developed a framework for the implementation of a risk management program.
- Assisted clients in identifying potential joint venture opportunities and alliance partners. Contacted interviewed and evaluated potential alliance candidates based on company-established criteria for several LDCs and marketing companies. Worked with several LDCs and unregulated marketing companies to establish alliances to enter into the retail energy market. Prepared testimony in support of several merger cases and participated in the regulatory process to obtain approval for these mergers.
- Assisted clients in several buy-side due diligence efforts, providing regulatory insight and developing valuation recommendations for acquisitions of both electric and gas properties.

### BULKLEY TESTIMONY LISTING

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
<b>Arizona Corporation Commission</b>				
Tucson Electric Power Company	6/25	Tucson Electric Power Company	Docket No. G-01933A-25-0103	Return on Equity
UNS Gas	11/24	UNS Gas	Docket No. G-04204A-24-0237	Return on Equity
Southwest Gas Corporation	02/24	Southwest Gas Corporation	Docket No. G-01551A-23-0341	Return on Equity
UNS Electric	11/22	UNS Electric	Docket No. E-04204A-15-0251	Return on Equity
Tucson Electric Power Company	6/22	Tucson Electric Power Company	Docket No. G-01933A-22-0107	Return on Equity
Southwest Gas Corporation	12/21	Southwest Gas Corporation	Docket No. G-01551A-21-0368	Return on Equity
Arizona Public Service Company	10/19	Arizona Public Service Company	Docket No. E-01345A-19-0236	Return on Equity
Tucson Electric Power Company	04/19	Tucson Electric Power Company	Docket No. E-01933A-19-0028	Return on Equity
Tucson Electric Power Company	11/15	Tucson Electric Power Company	Docket No. E-01933A-15-0322	Return on Equity
UNS Electric	05/15	UNS Electric	Docket No. E-04204A-15-0142	Return on Equity
UNS Electric	12/12	UNS Electric	Docket No. E-04204A-12-0504	Return on Equity
<b>Arkansas Public Service Commission</b>				
Oklahoma Gas and Electric Co	10/21	Oklahoma Gas and Electric Co	Docket No. D-18-046-FR	Return on Equity
Arkansas Oklahoma Gas Corporation	10/13	Arkansas Oklahoma Gas Corporation	Docket No. 13-078-U	Return on Equity
<b>California Public Utilities Commission</b>				



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Pacific Gas & Electric Company	03/25	Pacific Gas & Electric Company	25-03-010	Return on Equity
PacifiCorp, d/b/a Pacific Power	05/22	PacifiCorp, d/b/a Pacific Power	Docket No. A-22-05-006	Return on Equity
San Jose Water Company	05/21	San Jose Water Company	A2105004	Return on Equity
<b>Colorado Public Utilities Commission</b>				
Public Service Company of Colorado	12/25	Public Service Company of Colorado	Docket No. 25AL-0499G	Return on Equity
Public Service Company of Colorado	11/25	Public Service Company of Colorado	Docket No. 25AL-0494E	Return on Equity
Public Service Company of Colorado	01/24	Public Service Company of Colorado	Docket No. 24AL-___G	Return on Equity
Public Service Company of Colorado	11/22	Public Service Company of Colorado	Docket No. 22AL-0530E	Return on Equity
Public Service Company of Colorado	01/22	Public Service Company of Colorado	Docket No. 22AL-0046G	Return on Equity
Public Service Company of Colorado	07/21	Public Service Company of Colorado	21AL-0317E	Return on Equity
Public Service Company of Colorado	02/20	Public Service Company of Colorado	20AL-0049G	Return on Equity
Public Service Company of Colorado	05/19	Public Service Company of Colorado	19AL-0268E	Return on Equity
Public Service Company of Colorado	01/19	Public Service Company of Colorado	19AL-0063ST	Return on Equity
Atmos Energy Corporation	05/15	Atmos Energy Corporation	Docket No. 15AL-0299G	Return on Equity
Atmos Energy Corporation	04/14	Atmos Energy Corporation	Docket No. 14AL-0300G	Return on Equity
Atmos Energy Corporation	05/13	Atmos Energy Corporation	Docket No. 13AL-0496G	Return on Equity
<b>Connecticut Public Utilities Regulatory Authority</b>				
United Illuminating	11/24	United Illuminating	Docket No. 24-10-04	Return on Equity
The Southern Connecticut Gas Company	11/23	The Southern Connecticut Gas Company	Docket No. 23-11-02	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Connecticut Natural Gas Corporation	11/23	Connecticut Natural Gas Corporation	Docket No. 23-11-02	Return on Equity
Connecticut Water Company	10/23	Connecticut Water Company	Docket No. 23-08-32	Return on Equity
United Illuminating	09/22	United Illuminating	Docket No. 22-08-08	Return on Equity
United Illuminating	05/21	United Illuminating	Docket No. 17-12-03RE11	Return on Equity
Connecticut Water Company	01/21	Connecticut Water Company	Docket No. 20-12-30	Return on Equity
Connecticut Natural Gas Corporation	06/18	Connecticut Natural Gas Corporation	Docket No. 18-05-16	Return on Equity
Yankee Gas Services Co. d/b/a Eversource Energy	06/18	Yankee Gas Services Co. d/b/a Eversource Energy	Docket No. 18-05-10	Return on Equity
The Southern Connecticut Gas Company	06/17	The Southern Connecticut Gas Company	Docket No. 17-05-42	Return on Equity
The United Illuminating Company	07/16	The United Illuminating Company	Docket No. 16-06-04	Return on Equity
<b>Federal Energy Regulatory Commission</b>				
Northern Natural Gas Company	07/25	Northern Natural Gas Company	Docket No. RP25-___	Return on Equity
Sea Robin Pipeline	12/22	Sea Robin Pipeline	Docket No. RP22-___	Return on Equity
Northern Natural Gas Company	07/22	Northern Natural Gas Company	Docket No. RP22-___	Return on Equity
Transwestern Pipeline Company, LLC	07/22	Transwestern Pipeline Company, LLC	Docket No. RP22-___	Return on Equity
Florida Gas Transmission	02/21	Florida Gas Transmission	Docket No. RP21-441	Return on Equity
TransCanyon	01/21	TransCanyon	Docket No. ER21-1065	Return on Equity
Duke Energy	12/20	Duke Energy	Docket No. EL21-9-000	Return on Equity
Wisconsin Electric Power Company	08/20	Wisconsin Electric Power Company	Docket No. EL20-57-000	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Panhandle Eastern Pipe Line Company, LP	10/19	Panhandle Eastern Pipe Line Company, LP	Docket Nos. RP19-78-000 RP19-78-001	Return on Equity
Panhandle Eastern Pipe Line Company, LP	08/19	Panhandle Eastern Pipe Line Company, LP	Docket Nos. RP19-1523	Return on Equity
Sea Robin Pipeline Company LLC	11/18	Sea Robin Pipeline Company LLC	Docket# RP19-352-000	Return on Equity
Tallgrass Interstate Gas Transmission	10/15	Tallgrass Interstate Gas Transmission	RP16-137	Return on Equity
<b>Idaho Public Utilities Commission</b>				
Intermountain Gas Co	05/25	Intermountain Gas Co	C-INT-G-25-02	Return on Equity
PacifiCorp d/b/a Rocky Mountain Power	05/24	PacifiCorp d/b/a Rocky Mountain Power	Case No. PAC-E-24-04	Return on Equity
PacifiCorp d/b/a Rocky Mountain Power	05/21	PacifiCorp d/b/a Rocky Mountain Power	Case No. PAC-E-24-04	Return on Equity
Intermountain Gas Co	12/22	Intermountain Gas Co	C-INT-G-22-07	Return on Equity
PacifiCorp d/b/a Rocky Mountain Power	05/21	PacifiCorp d/b/a Rocky Mountain Power	Case No. PAC-E-21-07	Return on Equity
<b>Illinois Commerce Commission</b>				
Peoples Gas Light & Coke Company	01/26	Peoples Gas Light & Coke Company	D-26-0065	Return on Equity
North Shore Gas Company	01/26	North Shore Gas Company	D-26-0066	Return on Equity
Illinois American Water	01/24	Illinois American Water	Docket No. 24-0097	Return on Equity
Peoples Gas Light & Coke Company	01/23	Peoples Gas Light & Coke Company	D-23-0069	Return on Equity
North Shore Gas Company	01/23	North Shore Gas Company	D-23-0068	Return on Equity
Illinois American Water	02/22	Illinois American Water	Docket No. 22-0210	Return on Equity
North Shore Gas Company	02/21	North Shore Gas Company	No. 20-0810	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
<b>Indiana Utility Regulatory Commission</b>				
Ohio Valley Gas Corporation and Ohio Valley Gas, Inc.	02/24	Ohio Valley Gas Corporation and Ohio Valley Gas, Inc.	Cause No. 46011	Return on Equity
Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South	12/23	Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South	IURC Cause No. 45990	Return on Equity
Indiana Michigan Power Co.	08/23	Indiana Michigan Power Co.	IURC Cause No. 45933	Return on Equity
Indiana American Water Company	03/23	Indiana and Michigan American Water Company	IURC Cause No. 45870	Return on Equity
Indiana Michigan Power Co.	07/21	Indiana Michigan Power Co.	IURC Cause No. 45576	Return on Equity
Indiana Gas Company Inc.	12/20	Indiana Gas Company Inc.	IURC Cause No. 45468	Return on Equity
Southern Indiana Gas and Electric Company	10/20	Southern Indiana Gas and Electric Company	IURC Cause No. 45447	Return on Equity
Indiana and Michigan American Water Company	09/18	Indiana and Michigan American Water Company	IURC Cause No. 45142	Return on Equity
Indianapolis Power and Light Company	12/17	Indianapolis Power and Light Company	Cause No. 45029	Fair Value
Northern Indiana Public Service Company	09/17	Northern Indiana Public Service Company	Cause No. 44988	Fair Value
Indianapolis Power and Light Company	12/16	Indianapolis Power and Light Company	Cause No.44893	Fair Value
Northern Indiana Public Service Company	10/15	Northern Indiana Public Service Company	Cause No. 44688	Fair Value
Indianapolis Power and Light Company	09/15	Indianapolis Power and Light Company	Cause No. 44576 Cause No. 44602	Fair Value
Kokomo Gas and Fuel Company	09/10	Kokomo Gas and Fuel Company	Cause No. 43942	Fair Value

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Northern Indiana Fuel and Light Company, Inc.	09/10	Northern Indiana Fuel and Light Company, Inc.	Cause No. 43943	Fair Value
<b>Iowa Department of Commerce Utilities Board</b>				
MidAmerican Energy Company	02/25	MidAmerican Energy Company	Docket No. RPU-2025-0001	Return on Equity
Iowa-American Water Company	04/24	Iowa-American Water Company	Docket No. RPU-2024-000_	Return on Equity
MidAmerican Energy Company	06/23	MidAmerican Energy Company	Docket No. RPU-2023-___	Return on Equity
MidAmerican Energy Company	01/22	MidAmerican Energy Company	Docket No. RPU-2022-0001	Return on Equity
Iowa-American Water Company	08/20	Iowa-American Water Company	Docket No. RPU-2020-0001	Return on Equity
<b>Kansas Corporation Commission</b>				
Evergny Kansas	01/25	Evergny Kansas	Docket No. 25-EKCE-294-RTS	Return on Equity
Evergny Kansas	04/23	Evergny Kansas	Docket No. 23-EKCE-775-RTS	Return on Equity
Atmos Energy Corporation	08/15	Atmos Energy Corporation	Docket No. 16-ATMG-079-RTS	Return on Equity
<b>Kentucky Public Service Commission</b>				
Kentucky American Water Company	04/25	Kentucky American Water Company	Docket No. 2025-___	Return on Equity
Kentucky American Water Company	06/23	Kentucky American Water Company	Docket No. 2023-___	Return on Equity
Kentucky American Water Company	11/18	Kentucky American Water Company	Docket No. 2018-00358	Return on Equity
<b>Maine Public Utilities Commission</b>				
Central Maine Power	09/25	Central Maine Power	Docket No. 2025-___	Return on Equity
Central Maine Power	08/22	Central Maine Power	Docket No. 2022-00152	Return on Equity
Central Maine Power	10/18	Central Maine Power	Docket No. 2018-194	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
<b>Maryland Public Service Commission</b>				
Maryland American Water Company	06/18	Maryland American Water Company	Case No. 9487	Return on Equity
<b>Massachusetts Appellate Tax Board</b>				
Hopkinton LNG Corporation	03/20	Hopkinton LNG Corporation	Docket No.	Valuation of LNG Facility
FirstLight Hydro Generating Company	06/17	FirstLight Hydro Generating Company	Docket No. F-325471 Docket No. F-325472 Docket No. F-325473 Docket No. F-325474	Valuation of Electric Generation Assets
<b>Massachusetts Department of Public Utilities</b>				
Boston Gas Company	01/26	Boston Gas Company	DPU 26-50	Return on Equity
Berkshire Gas Company	11/25	Berkshire Gas Company	DPU 25-170	Return on Equity
Massachusetts Electric Company Nantucket Electric Company d/b/a National Grid	11/23	Massachusetts Electric Company Nantucket Electric Company d/b/a National Grid	DPU 23-150	Return on Equity
National Grid USA	11/20	Boston Gas Company	DPU 20-120	Return on Equity
Berkshire Gas Company	05/18	Berkshire Gas Company	DPU 18-40	Return on Equity
Unitil Corporation	01/04	Fitchburg Gas and Electric	DTE 03-52	Integrated Resource Plan; Gas Demand Forecast
<b>Michigan Public Service Commission</b>				
Consumers Energy	6/25	Consumers Energy	C-U-21870	Return on Equity
Consumers Energy	12/24	Consumers Energy	C-U-21806	Return on Equity
Upper Michigan Energy Resources Corporation	05/24	Upper Michigan Energy Resources Corporation	Case No. U-21541	Return on Equity
Michigan Gas Utilities Corporation	03/24	Michigan Gas Utilities Corporation	Case No. U-21540	Return on Equity
Indiana Michigan Power Co.	09/23	Indiana Michigan Power Co.	Case No. U-21461	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Michigan Gas Utilities Corporation	03/23	Michigan Gas Utilities Corporation	Case No. U-21366	Return on Equity
Michigan Gas Utilities Corporation	03/21	Michigan Gas Utilities Corporation	Case No. U-20718	Return on Equity
Wisconsin Electric Power Company	12/11	Wisconsin Electric Power Company	Case No. U-16830	Return on Equity
<b>Michigan Tax Tribunal</b>				
New Covert Generating Co., LLC.	03/18	The Township of New Covert Michigan	MTT Docket No. 000248TT and 16-001888-TT	Valuation of Electric Generation Assets
Covert Township	07/14	New Covert Generating Co., LLC.	Docket No. 399578	Valuation of Electric Generation Assets
<b>Minnesota Public Utilities Commission</b>				
Otter Tail Power Company	10/25	Otter Tail Power Company	E017/GR-25-359	Return on Equity
ALLETE, Inc. d/b/a Minnesota Power	11/23	Allete, Inc. d/b/a Minnesota Power	D-E-015/GR-23-155	Return on Equity
CenterPoint Energy Resources	11/23	CenterPoint Energy Resources	D-G-008/GR-23-173	Return on Equity
Minnesota Energy Resources Corporation	11/22	Minnesota Energy Resources Corporation	Docket No. G011/GR-22-504	Return on Equity
CenterPoint Energy Resources	11/21	CenterPoint Energy Resources	D-G-008/GR-21-435	Return on Equity
ALLETE, Inc. d/b/a Minnesota Power	11/21	Allete, Inc. d/b/a Minnesota Power	D-E-015/GR-21-630	Return on Equity
Otter Tail Power Company	11/20	Otter Tail Power Company	E017/GR-20-719	Return on Equity
ALLETE, Inc. d/b/a Minnesota Power	11/19	Allete, Inc. d/b/a Minnesota Power	E015/GR-19-442	Return on Equity
CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas	10/19	CenterPoint Energy Resources Corporation d/b/a CenterPoint Energy Minnesota Gas	G-008/GR-19-524	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Great Plains Natural Gas Co.	09/19	Great Plains Natural Gas Co.	Docket No. G004/GR-19-511	Return on Equity
Minnesota Energy Resources Corporation	10/17	Minnesota Energy Resources Corporation	Docket No. G011/GR-17-563	Return on Equity
<b>Missouri Public Service Commission</b>				
Evergy Metro Inc.	02/26	Evergy Metro Inc.	C-ER-2026-0143	Return on Equity
Ameren Missouri	09/24	Ameren Missouri	File No. GR-2024-0369	Return on Equity
Missouri American Water Company	07/24	Missouri American Water Company	WR-2024-0320	Return on Equity
Ameren Missouri	06/24	Ameren Missouri	File No. ER-2024-0319	Return on Equity
Evergy Missouri West	02/24	Evergy Missouri West	File No. ER-2024-0189	Return on Equity
Ameren Missouri	08/22	Ameren Missouri	File No. ER-2022-0337	Return on Equity
Missouri American Water Company	07/22	Missouri American Water Company	Case No. WR-2022-0303 Case No. SR-2022-0304	Return on Equity
Evergy Missouri West	01/22	Evergy Missouri West	File No. ER-2022-0130	Return on Equity
Evergy Missouri Metro	01/22	Evergy Missouri Metro	File No. ER-2022-0129	Return on Equity
Ameren Missouri	03/21	Ameren Missouri	Docket No. ER-2021-0240 Docket No. GR-2021-0241	Return on Equity
Missouri American Water Company	06/20	Missouri American Water Company	Case No. WR-2020-0344 Case No. SR-2020-0345	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Missouri American Water Company	06/17	Missouri American Water Company	Case No. WR-17-0285 Case No. SR-17-0286	Return on Equity
<b>Montana Public Service Commission</b>				
Montana-Dakota Utilities Co.	9/25	Montana-Dakota Utilities Co.	D2025-09-072	Return on Equity
Montana-Dakota Utilities Co.	7/24	Montana-Dakota Utilities Co.	D2024-05-061	Return on Equity
Montana-Dakota Utilities Co.	11/22	Montana-Dakota Utilities Co.	D2022.11.099	Return on Equity
Montana-Dakota Utilities Co.	06/20	Montana-Dakota Utilities Co.	D2020.06.076	Return on Equity
Montana-Dakota Utilities Co.	09/18	Montana-Dakota Utilities Co.	D2018.9.60	Return on Equity
<b>Public Utilities Commission of Nevada</b>				
Nevada Power Company d/b/a NV Energy	02/25	Nevada Power Company d/b/a NV Energy	25-02016	Return on Equity
Sierra Pacific Power Company d/b/a NV Energy	02/24	Sierra Pacific Power Company d/b/a NV Energy	24-02026	Return on Equity
Nevada Power Company d/b/a NV Energy	06/23	Nevada Power Company d/b/a NV Energy	23-06007	Return on Equity
Nevada Power Company d/b/a NV Energy	03/23	Nevada Power Company d/b/a NV Energy	22-03028	Merger benefits
<b>New Hampshire - Board of Tax and Land Appeals</b>				
Public Service Company of New Hampshire d/b/a Eversource Energy	11/19 12/19	Public Service Company of New Hampshire d/b/a Eversource Energy	Master Docket No. 28873-14-15-16-17PT	Valuation of Utility Property and Generating Assets
<b>New Hampshire Public Utilities Commission</b>				
Liberty Utilities (EnergyNorth Natural Gas)	07/23	Liberty Utilities (EnergyNorth Natural Gas)	Docket No. DG 23-067	Return on Equity
Liberty Utilities (Granite State Electric)	05/23	Liberty Utilities (Granite State Electric)	Docket No. DE 23-039	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Public Service Company of New Hampshire	05/19	Public Service Company of New Hampshire	DE-19-057	Return on Equity
<b>New Hampshire-Merrimack County Superior Court</b>				
Northern New England Telephone Operations, LLC d/b/a FairPoint Communications, NNE	04/18	Northern New England Telephone Operations, LLC d/b/a FairPoint Communications, NNE	220-2012-CV-1100	Valuation of Utility Property
<b>New Hampshire-Rockingham Superior Court</b>				
Eversource Energy	05/18	Public Service Commission of New Hampshire	218-2016-CV-00899 218-2017-CV-00917	Valuation of Utility Property
<b>New Jersey Board of Public Utilities</b>				
South Jersey Gas Company	11/25	South Jersey Gas Company	D-GR25110627	Return on Equity
New Jersey American Water Company, Inc.	02/24	New Jersey American Water Company, Inc.	WR2401056	Return on Equity
Elizabethtown Gas Company	2/24	Elizabethtown Gas Company	GR24020158	Return on Equity
Public Service Electric and Gas Company	12/23	Public Service Electric and Gas Company	ER23120924 GR23120925	Return on Equity
New Jersey American Water Company, Inc.	01/22	New Jersey American Water Company, Inc.	WR22010019	Return on Equity
Public Service Electric and Gas Company	10/20	Public Service Electric and Gas Company	EO18101115	Return on Equity
New Jersey American Water Company, Inc.	12/19	New Jersey American Water Company, Inc.	WR19121516	Return on Equity
Public Service Electric and Gas Company	04/19	Public Service Electric and Gas Company	EO18060629 GO18060630	Return on Equity
Public Service Electric and Gas Company	02/18	Public Service Electric and Gas Company	GR17070776	Return on Equity
Public Service Electric and Gas Company	01/18	Public Service Electric and Gas Company	ER18010029 GR18010030	Return on Equity
<b>New Mexico Public Regulation Commission</b>				

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Southwestern Public Service Company	07/19	Southwestern Public Service Company	19-00170-UT	Return on Equity
Southwestern Public Service Company	10/17	Southwestern Public Service Company	Case No. 17-00255-UT	Return on Equity
Southwestern Public Service Company	12/16	Southwestern Public Service Company	Case No. 16-00269-UT	Return on Equity
Southwestern Public Service Company	10/15	Southwestern Public Service Company	Case No. 15-00296-UT	Return on Equity
Southwestern Public Service Company	06/15	Southwestern Public Service Company	Case No. 15-00139-UT	Return on Equity
<b>New York State Department of Public Service</b>				
New York State Electric and Gas Company Rochester Gas and Electric	06/25	New York State Electric and Gas Company Rochester Gas and Electric	25-E-0375 25-G-0378 25-E-0379 25-G-0380	Return on Equity
Liberty Utilities (New York Water)	5/23	Liberty Utilities (New York Water)	Case 23-W-0235	Return on Equity
New York State Electric and Gas Company Rochester Gas and Electric	05/22	New York State Electric and Gas Company Rochester Gas and Electric	22-E-0317 22-G-0318 22-E-0319 22-G-0320	Return on Equity
Corning Natural Gas Corporation	07/21	Corning Natural Gas Corporation	Case No. 21-G-0394	Return on Equity
Central Hudson Gas and Electric Corporation	08/20	Central Hudson Gas and Electric Corporation	Electric 20-E-0428 Gas 20-G-0429	Return on Equity
Niagara Mohawk Power Corporation	07/20	National Grid USA	Case No. 20-E-0380 20-G-0381	Return on Equity
Corning Natural Gas Corporation	02/20	Corning Natural Gas Corporation	Case No. 20-G-0101	Return on Equity
New York State Electric and Gas Company Rochester Gas and Electric	05/19	New York State Electric and Gas Company Rochester Gas and Electric	19-E-0378 19-G-0379 19-E-0380 19-G-0381	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
Brooklyn Union Gas Company d/b/a National Grid NY KeySpan Gas East Corporation d/b/a National Grid	04/19	Brooklyn Union Gas Company d/b/a National Grid NY KeySpan Gas East Corporation d/b/a National Grid	19-G-0309 19-G-0310	Return on Equity
Central Hudson Gas and Electric Corporation	07/17	Central Hudson Gas and Electric Corporation	Electric 17-E-0459 Gas 17-G-0460	Return on Equity
Niagara Mohawk Power Corporation	04/17	National Grid USA	Case No. 17-E-0238 17-G-0239	Return on Equity
Corning Natural Gas Corporation	06/16	Corning Natural Gas Corporation	Case No. 16-G-0369	Return on Equity
National Fuel Gas Company	04/16	National Fuel Gas Company	Case No. 16-G-0257	Return on Equity
KeySpan Energy Delivery	01/16	KeySpan Energy Delivery	Case No. 15-G-0058 Case No. 15-G-0059	Return on Equity
New York State Electric and Gas Company Rochester Gas and Electric	05/15	New York State Electric and Gas Company Rochester Gas and Electric	Case No. 15-E-0283 Case No. 15-G-0284 Case No. 15-E-0285 Case No. 15-G-0286	Return on Equity
<b>North Dakota Public Service Commission</b>				
Otter Tail Power Company	11/23	Otter Tail Power Company	Case No. PU-23-342	Return on Equity
Montana-Dakota Utilities Co.	11/23	Montana-Dakota Utilities Co.	Case No. PU-23-341	Return on Equity
Montana-Dakota Utilities Co.	05/22	Montana-Dakota Utilities Co.	C-PU-22-194	Return on Equity
Montana-Dakota Utilities Co.	08/20	Montana-Dakota Utilities Co.	C-PU-20-379	Return on Equity
Northern States Power Company	12/12	Northern States Power Company	C-PU-12-813	Return on Equity
Northern States Power Company	12/10	Northern States Power Company	C-PU-10-657	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
<b>Oklahoma Corporation Commission</b>				
Oklahoma Gas & Electric	12/23	Oklahoma Gas & Electric	Cause No. PUD2023-000087	Return on Equity
Oklahoma Gas & Electric	12/21	Oklahoma Gas & Electric	Cause No. PUD 202100164	Return on Equity
Arkansas Oklahoma Gas Corporation	01/13	Arkansas Oklahoma Gas Corporation	Cause No. PUD 201200236	Return on Equity
<b>Oregon Public Service Commission</b>				
Cascade Natural Gas Corporation	11/25	Cascade Natural Gas Corporation	UG 525	Return on Equity
PacifiCorp d/b/a Pacific Power & Light	02/24	PacifiCorp d/b/a Pacific Power & Light	Docket No. UE-433	Return on Equity
PacifiCorp d/b/a Pacific Power & Light	03/22	PacifiCorp d/b/a Pacific Power & Light	Docket No. UE-399	Return on Equity
PacifiCorp d/b/a Pacific Power & Light	02/20	PacifiCorp d/b/a Pacific Power & Light	Docket No. UE-374	Return on Equity
<b>Pennsylvania Public Utility Commission</b>				
American Water Works Company Inc.	11/25	Pennsylvania-American Water Company	Docket No. R-2025-3057983 (water) Docket No. R-2025-3058051 (wastewater)	Return on Equity
American Water Works Company Inc.	11/23	Pennsylvania-American Water Company	Docket No. R-2023-3043189 (water) Docket No. R-2023-3043190 (wastewater)	Return on Equity
American Water Works Company Inc.	04/22	Pennsylvania-American Water Company	Docket No. R-2020-3031672 (water) Docket No. R-2020-3031673 (wastewater)	Return on Equity
American Water Works Company Inc.	04/20	Pennsylvania-American Water Company	Docket No. R-2020-3019369 (water) Docket No. R-2020-3019371 (wastewater)	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
American Water Works Company Inc.	04/17	Pennsylvania-American Water Company	Docket No. R-2017-2595853	Return on Equity
<b>South Dakota Public Utilities Commission</b>				
Otter Tail Power Co.	06/25	Otter Tail Power Co.	D-EL25-022	Return on Equity
Montana-Dakota Utilities Co.	10/23	Montana-Dakota Utilities Co.	Docket No. EL23-020	Return on Equity
MidAmerican Energy Company	05/22	MidAmerican Energy Company	D-NG22-005	Return on Equity
Northern States Power Company	06/14	Northern States Power Company	Docket No. EL14-058	Return on Equity
<b>Tennessee Public Utility Commission</b>				
Tennessee American Water Company	04/24	Tennessee American Water Company	Docket No.24-00032	Return on Equity
<b>Texas Public Utility Commission</b>				
Sharyland Utilities, L.L.C.	05/25	Sharyland Utilities, L.L.C.	Docket No. 57994	Return on Equity
Electric Transmission Texas LLC	02/25	Electric Transmission Texas LLC	Docket No. 57518	Return on Equity
CenterPoint Energy Houston	03/24	CenterPoint Energy Houston	D-56211	Return on Equity
AEP Texas	02/24	AEP Texas	D-56165	Return on Equity
Entergy Texas, Inc.	07/22	Entergy Texas, Inc.	D-53719	Return on Equity
Southwestern Public Service Commission	08/19	Southwestern Public Service Commission	Docket No. D-49831	Return on Equity
Southwestern Public Service Company	01/14	Southwestern Public Service Company	Docket No. 42004	Return on Equity
<b>Texas Railroad Commission</b>				
CenterPoint Energy Entex and CenterPoint Energy Texas Gas	10/23	CenterPoint Energy Entex and CenterPoint Energy Texas Gas	2023 Texas Division Rate Case Case No. OS-23-00015513	Return on Equity
<b>Utah Public Service Commission</b>				

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
PacifiCorp d/b/a Rocky Mountain Power	06/24	PacifiCorp d/b/a Rocky Mountain Power	Docket No. 24-035-04	Return on Equity
PacifiCorp d/b/a Rocky Mountain Power	05/20	PacifiCorp d/b/a Rocky Mountain Power	Docket No. 20-035-04	Return on Equity
<b>Virginia State Corporation Commission</b>				
Virginia American Water Company, Inc.	11/25	Virginia American Water Company, Inc.	Docket No. PUR-2025-00185	Return on Equity
Virginia American Water Company, Inc.	11/23	Virginia American Water Company, Inc.	Docket No. PUR-2023-00194	Return on Equity
Virginia American Water Company, Inc.	11/21	Virginia American Water Company, Inc.	Docket No. PUR-2021-00255	Return on Equity
Virginia American Water Company, Inc.	11/18	Virginia American Water Company, Inc.	Docket No. PUR-2018-00175	Return on Equity
<b>Washington Utilities Transportation Commission</b>				
Cascade Natural Gas Corporation	03/24	Cascade Natural Gas Corporation	Docket No. UG-240008	Return on Equity
Puget Sound Energy Inc.	02/24	Puget Sound Energy Inc.	Docket No. UE-240004 UG-240005	Return on Equity
PacifiCorp d/b/a Pacific Power & Light	03/23	PacifiCorp d/b/a Pacific Power & Light	Docket No. UE-230172	Return on Equity
Cascade Natural Gas Corporation	06/20	Cascade Natural Gas Corporation	Docket No. UG-200568	Return on Equity
PacifiCorp d/b/a Pacific Power & Light	12/19	PacifiCorp d/b/a Pacific Power & Light	Docket No. UE-191024	Return on Equity
Cascade Natural Gas Corporation	04/19	Cascade Natural Gas Corporation	Docket No. UG-190210	Return on Equity
<b>West Virginia Public Service Commission</b>				
West Virginia American Water Company	05/25	West Virginia American Water Company	Case No. 25-____-W-42T	Return on Equity
West Virginia American Water Company	05/23	West Virginia American Water Company	Case No. 23-0383-W-42T	Return on Equity



SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
West Virginia American Water Company	04/21	West Virginia American Water Company	Case No. 21-02369-W-42T	Return on Equity
West Virginia American Water Company	04/18	West Virginia American Water Company	Case No. 18-0573-W-42T Case No. 18-0576-S-42T	Return on Equity
<b>Wisconsin Public Service Commission</b>				
Wisconsin Power and Light	04/24	Wisconsin Power and Light	Docket No. 6680-UR-128	Return on Equity
Wisconsin Electric Power Company and Wisconsin Gas LLC	04/24	Wisconsin Electric Power Company and Wisconsin Gas LLC	Docket No. 05-UR-111	Return on Equity
Wisconsin Power and Light	05/23	Wisconsin Power and Light	Docket No. 6680-UR-124	Return on Equity
Wisconsin Electric Power Company and Wisconsin Gas LLC	04/22	Wisconsin Electric Power Company and Wisconsin Gas LLC	Docket No. 05-UR-110	Return on Equity
Wisconsin Public Service Corp.	04/22	Wisconsin Public Service Corp.	6690-UR-127	Return on Equity
Alliant Energy		Alliant Energy		Return on Equity
Wisconsin Electric Power Company and Wisconsin Gas LLC	03/19	Wisconsin Electric Power Company and Wisconsin Gas LLC	Docket No. 05-UR-109	Return on Equity
Wisconsin Public Service Corp.	03/19	Wisconsin Public Service Corp.	6690-UR-126	Return on Equity
<b>Wyoming Public Service Commission</b>				
Montana-Dakota Utilities Co.	06/25	Montana-Dakota Utilities Co.	Docket No. 20004-174-ER-25	Return on Equity
Montana-Dakota Utilities Co.	10/24	Montana-Dakota Utilities Co.	Docket No. 30013-415-GR-24	Return on Equity
PacifiCorp d/b/a Rocky Mountain Power	08/24	PacifiCorp d/b/a Rocky Mountain Power	Docket No. 20000-671-ER-24	Return on Equity
PacifiCorp d/b/a Rocky Mountain Power	02/23	PacifiCorp d/b/a Rocky Mountain Power	Docket No. 20000-633-ER-23	Return on Equity

SPONSOR	DATE	CASE/APPLICANT	DOCKET /CASE NO.	SUBJECT
PacifiCorp d/b/a Rocky Mountain Power	03/20	PacifiCorp d/b/a Rocky Mountain Power	Docket No. 20000-578-ER-20	Return on Equity
Montana-Dakota Utilities Co.	05/19	Montana-Dakota Utilities Co.	30013-351-GR-19	Return on Equity

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CERTIFICATIONS/ACCREDITATIONS

Certified General Appraiser, licensed in the Commonwealth of Massachusetts

**COST OF EQUITY ANALYSES**  
**SUMMARY OF RESULTS AS OF APRIL 30, 2026**

	Minimum Growth Rate	Average Growth Rate	Maximum Growth Rate
Constant Growth DCF:			
Mean			
30-Day Avg. Stock Price	10.03%	10.76%	11.43%
90-Day Avg. Stock Price	10.14%	10.87%	11.54%
180-Day Avg. Stock Price	10.23%	10.95%	11.63%
Average	10.13%	10.86%	11.53%
Median			
30-Day Avg. Stock Price	9.74%	10.15%	10.44%
90-Day Avg. Stock Price	9.91%	10.33%	10.56%
180-Day Avg. Stock Price	9.99%	10.41%	10.69%
Average	9.88%	10.30%	10.56%
30-Year Treasury Bond Yield			
	Current 30-Day Avg	Near-Term Projected	Longer-Term Projected
CAPM:			
Current <i>Value Line</i> Beta	11.44%	11.42%	11.37%
Long-term Avg. <i>Value Line</i> Beta	11.19%	11.16%	11.11%
ECAPM:			
Current <i>Value Line</i> Beta	11.90%	11.88%	11.85%
Long-term Avg. <i>Value Line</i> Beta	11.71%	11.69%	11.65%

## PROXY GROUP SCREENING DATA AND RESULTS

	[1]	[2]	[3]	[4]	[5]	
Company	Ticker	Dividends	S&P Investment Grade Credit Rating (AAA to BBB-)	Positive Long-Term Earnings Growth Rate From At Least Two Sources	% Regul. Oper. Income to Total Oper. Income > 70%	Announced Merger
Atmos Energy Corporation	ATO	Yes	A-	Yes	100.00%	No
Chesapeake Utilities Corporation	CPK	Yes	BBB+	Yes	82.68%	No
NiSource Inc.	NI	Yes	BBB+	Yes	99.44%	No
Northwest Natural Gas Company	NWN	Yes	A-	Yes	99.75%	No
ONE Gas, Inc.	OGS	Yes	A-	Yes	100.00%	No
Southwest Gas Corporation	SWX	Yes	BBB+	Yes	86.42%	No
American States Water Company	AWR	Yes	A	Yes	84.42%	No
California Water Service Group	CWT	Yes	A+	Yes	96.41%	No
Middlesex Water Company	MSEX	Yes	A	Yes	92.59%	No
H2O America (SJW Group)	HTO	Yes	A-	Yes	98.75%	No

## Notes:

[1] Bloomberg Professional

[2] Bloomberg Professional; FitchRatings for CPK

[3] Value Line, Zacks and S&P Capital IQ

[4] Form 10-K's for 2024, 2023, and 2022

[5] S&P Capital IQ Pro Financial News Releases

**CONSTANT GROWTH DCF  
30 DAY AVERAGE STOCK PRICES**

		[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
Company	Ticker	Annualized Dividend	Stock Price	Dividend Yield	Expected Dividend Yield	Value Line Projected EPS Growth Rate	S&P Capital IQ Projected EPS Growth Rate	Zacks Projected EPS Growth Rate	Average Projected EPS Growth Rate	Cost of Equity: Minimum Growth Rate	Cost of Equity: Mean Growth Rate	Cost of Equity: Maximum Growth Rate
Atmos Energy Corporation	ATO	\$4.00	\$185.97	2.15%	2.23%	8.00%	8.02%	6.80%	7.61%	9.02%	9.84%	10.26%
Chesapeake Utilities Corporation	CPK	\$2.74	\$127.15	2.15%	2.24%	8.00%	8.30%	n/a	8.15%	10.24%	10.39%	10.54%
NiSource Inc.	NI	\$1.20	\$46.91	2.56%	2.66%	7.50%	9.10%	6.10%	7.57%	8.74%	10.22%	11.78%
Northwest Natural Gas Company	NWN	\$1.97	\$53.12	3.71%	3.82%	6.00%	6.50%	n/a	6.25%	9.82%	10.07%	10.33%
ONE Gas, Inc.	OGS	\$2.72	\$87.64	3.10%	3.20%	6.00%	6.23%	6.20%	6.14%	9.20%	9.34%	9.43%
Southwest Gas Corporation	SWX	\$2.48	\$89.29	2.78%	2.93%	n/a	12.21%	9.20%	10.71%	12.11%	13.63%	15.16%
American States Water Company	AWR	\$2.02	\$76.54	2.63%	2.73%	7.00%	6.93%	n/a	6.96%	9.65%	9.69%	9.73%
California Water Service Group	CWT	\$1.34	\$45.47	2.95%	3.10%	9.50%	10.62%	n/a	10.06%	12.59%	13.15%	13.72%
Middlesex Water Company	MSEX	\$1.44	\$52.47	2.74%	2.88%	8.00%	11.70%	n/a	9.85%	10.85%	12.73%	14.60%
H2O America (SJW Group)	HTO	\$1.76	\$58.47	3.01%	3.09%	5.00%	5.66%	5.60%	5.42%	8.09%	8.51%	8.75%
Mean										10.03%	10.76%	11.43%
Median										9.74%	10.15%	10.44%

## Notes:

[1] Bloomberg Professional as of April 30, 2026

[2] Bloomberg Professional 30-day average as of April 30, 2026

[3] Equals [1]/[2]

[4] Equals [3] x (1 + 0.5 x [8])

[5] Value Line

[6] S&P Capital IQ

[7] Zacks. Note, S&P Capital IQ and Zacks report an equivalent projected EPS growth rate for AWR and CWT, and to avoid double counting, the projected EPS growth rates for these companies are excluded (shown as n/a).

[8] Equals average of [5], [6], [7]

[9] Equals [3] x (1 + 0.5 x (min([5], [6], [7])) + (min([5], [6], [7])))

[10] Equals [4] + [8]

[11] Equals [3] x (1 + 0.5 x (max([5], [6], [7])) + (max([5], [6], [7])))

**CONSTANT GROWTH DCF  
90 DAY AVERAGE STOCK PRICES**

		[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
					Expected	Value Line	S&P Capital	Zacks	Average	Cost of	Cost of	Cost of
		Annualized	Stock	Dividend	Dividend	Projected	IQ Projected	Projected	Projected	Equity:	Equity:	Equity:
Company	Ticker	Dividend	Price	Yield	Yield	EPS	EPS Growth	EPS	EPS	Minimum	Mean	Maximum
						Rate	Rate	Growth	Growth	Growth	Growth	Growth
Atmos Energy Corporation	ATO	\$4.00	\$177.97	2.25%	2.33%	8.00%	8.02%	6.80%	7.61%	9.12%	9.94%	10.36%
Chesapeake Utilities Corporation	CPK	\$2.74	\$127.86	2.14%	2.23%	8.00%	8.30%	n/a	8.15%	10.23%	10.38%	10.53%
NiSource Inc.	NI	\$1.20	\$45.01	2.67%	2.77%	7.50%	9.10%	6.10%	7.57%	8.85%	10.33%	11.89%
Northwest Natural Gas Company	NWN	\$1.97	\$49.75	3.96%	4.08%	6.00%	6.50%	n/a	6.25%	10.08%	10.33%	10.59%
ONE Gas, Inc.	OGS	\$2.72	\$83.45	3.26%	3.36%	6.00%	6.23%	6.20%	6.14%	9.36%	9.50%	9.59%
Southwest Gas Corporation	SWX	\$2.48	\$85.86	2.89%	3.04%	n/a	12.21%	9.20%	10.71%	12.22%	13.75%	15.28%
American States Water Company	AWR	\$2.02	\$74.32	2.71%	2.81%	7.00%	6.93%	n/a	6.96%	9.73%	9.77%	9.81%
California Water Service Group	CWT	\$1.34	\$44.82	2.99%	3.14%	9.50%	10.62%	n/a	10.06%	12.63%	13.20%	13.76%
Middlesex Water Company	MSEX	\$1.44	\$52.45	2.75%	2.88%	8.00%	11.70%	n/a	9.85%	10.86%	12.73%	14.61%
H2O America (SJW Group)	HTO	\$1.76	\$54.86	3.21%	3.29%	5.00%	5.66%	5.60%	5.42%	8.29%	8.71%	8.96%
Mean										10.14%	10.87%	11.54%
Median										9.91%	10.33%	10.56%

## Notes:

[1] Bloomberg Professional as of April 30, 2026

[2] Bloomberg Professional 90-day average as of April 30, 2026

[3] Equals [1]/[2]

[4] Equals [3] x (1 + 0.5 x [8])

[5] Value Line

[6] S&P Capital IQ

[7] Zacks. Note, S&P Capital IQ and Zacks report an equivalent projected EPS growth rate for AWR and CWT, and to avoid double counting, the projected EPS growth rates for these companies are excluded (shown as n/a).

[8] Equals average of [5], [6], [7]

[9] Equals [3] x (1 + 0.5 x (min([5], [6], [7])) + (min([5], [6], [7])))

[10] Equals [4] + [8]

[11] Equals [3] x (1 + 0.5 x (max([5], [6], [7])) + (max([5], [6], [7])))

**CONSTANT GROWTH DCF  
180 DAY AVERAGE STOCK PRICES**

		[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
						Value Line Projected EPS Growth Rate	S&P Capital IQ Projected EPS Growth Rate	Zacks Projected EPS Growth Rate	Average Projected EPS Growth Rate	Cost of Equity: Minimum Growth Rate	Cost of Equity: Mean Growth Rate	Cost of Equity: Maximum Growth Rate
Company	Ticker	Annualized Dividend	Stock Price	Dividend Yield	Expected Dividend Yield							
Atmos Energy Corporation	ATO	\$4.00	\$173.40	2.31%	2.39%	8.00%	8.02%	6.80%	7.61%	9.19%	10.00%	10.42%
Chesapeake Utilities Corporation	CPK	\$2.74	\$128.35	2.13%	2.22%	8.00%	8.30%	n/a	8.15%	10.22%	10.37%	10.52%
NiSource Inc.	NI	\$1.20	\$43.34	2.77%	2.87%	7.50%	9.10%	6.10%	7.57%	8.95%	10.44%	12.00%
Northwest Natural Gas Company	NWN	\$1.97	\$46.72	4.22%	4.35%	6.00%	6.50%	n/a	6.25%	10.34%	10.60%	10.85%
ONE Gas, Inc.	OGS	\$2.72	\$80.69	3.37%	3.47%	6.00%	6.23%	6.20%	6.14%	9.47%	9.62%	9.70%
Southwest Gas Corporation	SWX	\$2.48	\$82.11	3.02%	3.18%	n/a	12.21%	9.20%	10.71%	12.36%	13.89%	15.42%
American States Water Company	AWR	\$2.02	\$73.54	2.74%	2.84%	7.00%	6.93%	n/a	6.96%	9.76%	9.80%	9.84%
California Water Service Group	CWT	\$1.34	\$45.15	2.97%	3.12%	9.50%	10.62%	n/a	10.06%	12.61%	13.18%	13.74%
Middlesex Water Company	MSEX	\$1.44	\$52.81	2.73%	2.86%	8.00%	11.70%	n/a	9.85%	10.84%	12.71%	14.59%
H2O America (SJW Group)	HTO	\$1.76	\$51.29	3.43%	3.52%	5.00%	5.66%	5.60%	5.42%	8.52%	8.94%	9.19%
Mean										10.23%	10.95%	11.63%
Median										9.99%	10.41%	10.69%

## Notes:

[1] Bloomberg Professional as of April 30, 2026

[2] Bloomberg Professional 180-day average as of April 30, 2026

[3] Equals [1]/[2]

[4] Equals [3] x (1 + 0.5 x [8])

[5] Value Line

[6] S&amp;P Capital IQ

[7] Zacks. Note, S&amp;P Capital IQ and Zacks report an equivalent projected EPS growth rate for AWR and CWT, and to avoid double counting, the projected EPS growth rates for these companies are excluded (shown as n/a).

[8] Equals average of [5], [6], [7]

[9] Equals [3] x (1 + 0.5 x (min([5], [6], [7])) + (min([5], [6], [7])))

[10] Equals [4] + [8]

[11] Equals [3] x (1 + 0.5 x (max([5], [6], [7])) + (max([5], [6], [7])))

**CAPITAL ASSET PRICING MODEL  
CURRENT RISK FREE RATE AND VALUE LINE BETA**

	[1]	[2]	[3]	[4]	[5]	[6]	
Company	Ticker	Current 30-day average of 30-year U.S. Treasury bond yield	Beta	Market Return	Market Risk Premium	Cost of Equity: CAPM	Cost of Equity: ECAPM
Atmos Energy Corporation	ATO	4.91%	0.80	13.28%	8.36%	11.60%	12.02%
Chesapeake Utilities Corporation	CPK	4.91%	0.75	13.28%	8.36%	11.19%	11.71%
NiSource Inc.	NI	4.91%	0.85	13.28%	8.36%	12.02%	12.34%
Northwest Natural Gas Company	NWN	4.91%	0.80	13.28%	8.36%	11.60%	12.02%
ONE Gas, Inc.	OGS	4.91%	0.75	13.28%	8.36%	11.19%	11.71%
Southwest Gas Corporation	SWX	4.91%	0.80	13.28%	8.36%	11.60%	12.02%
American States Water Company	AWR	4.91%	0.75	13.28%	8.36%	11.19%	11.71%
California Water Service Group	CWT	4.91%	0.75	13.28%	8.36%	11.19%	11.71%
Middlesex Water Company	MSEX	4.91%	0.80	13.28%	8.36%	11.60%	12.02%
H2O America (SJW Group)	HTO	4.91%	0.75	13.28%	8.36%	11.19%	11.71%
Mean						11.44%	11.90%
Median						11.40%	11.87%

## Notes:

[1] Bloomberg Professional as of April 30, 2026

[2] Value Line

[3] Exhibit AEB-6

[4] Equals [3]-[1]

[5] Equals [1] + [2] x [4]

[6] Equals [1] + 0.25 x ([4]) + 0.75 x ([2] x [4])

**CAPITAL ASSET PRICING MODEL**  
**NEAR TERM PROJECTED RISK-FREE RATE AND VALUE LINE BETA**

		[1]	[2]	[3]	[4]	[5]	[6]
Company	Ticker	Near-term projected 30-year U.S. Treasury bond yield (Q3 2026 - Q3 2027)	Beta	Market Return	Market Risk Premium	Cost of Equity: CAPM	Cost of Equity: ECAPM
Atmos Energy Corporation	ATO	4.82%	0.80	13.28%	8.46%	11.59%	12.01%
Chesapeake Utilities Corporation	CPK	4.82%	0.75	13.28%	8.46%	11.16%	11.69%
NiSource Inc.	NI	4.82%	0.85	13.28%	8.46%	12.01%	12.33%
Northwest Natural Gas Company	NWN	4.82%	0.80	13.28%	8.46%	11.59%	12.01%
ONE Gas, Inc.	OGS	4.82%	0.75	13.28%	8.46%	11.16%	11.69%
Southwest Gas Corporation	SWX	4.82%	0.80	13.28%	8.46%	11.59%	12.01%
American States Water Company	AWR	4.82%	0.75	13.28%	8.46%	11.16%	11.69%
California Water Service Group	CWT	4.82%	0.75	13.28%	8.46%	11.16%	11.69%
Middlesex Water Company	MSEX	4.82%	0.80	13.28%	8.46%	11.59%	12.01%
H2O America (SJW Group)	HTO	4.82%	0.75	13.28%	8.46%	11.16%	11.69%
Mean						11.42%	11.88%
Median						11.37%	11.85%

## Notes:

[1] Blue Chip Financial Forecasts, Vol. 45, No. 5, May 1, 2026, at 2

[2] Value Line

[3] Exhibit AEB-6

[4] Equals [3]-[1]

[5] Equals [1] + [2] x [4]

[6] Equals [1] + 0.25 x ([4]) + 0.75 x ([2] x [4])

**CAPITAL ASSET PRICING MODEL**  
**LONG-TERM PROJECTED RISK-FREE RATE AND VALUE LINE BETA**

	[1]	[2]	[3]	[4]	[5]	[6]	
Company	Ticker	Projected 30-year U.S. Treasury bond yield (2027 - 2031)	Beta	Market Return	Market Risk Premium	Cost of Equity: CAPM	Cost of Equity: ECAPM
Atmos Energy Corporation	ATO	4.60%	0.80	13.28%	8.68%	11.54%	11.98%
Chesapeake Utilities Corporation	CPK	4.60%	0.75	13.28%	8.68%	11.11%	11.65%
NiSource Inc.	NI	4.60%	0.85	13.28%	8.68%	11.98%	12.30%
Northwest Natural Gas Company	NWN	4.60%	0.80	13.28%	8.68%	11.54%	11.98%
ONE Gas, Inc.	OGS	4.60%	0.75	13.28%	8.68%	11.11%	11.65%
Southwest Gas Corporation	SWX	4.60%	0.80	13.28%	8.68%	11.54%	11.98%
American States Water Company	AWR	4.60%	0.75	13.28%	8.68%	11.11%	11.65%
California Water Service Group	CWT	4.60%	0.75	13.28%	8.68%	11.11%	11.65%
Middlesex Water Company	MSEX	4.60%	0.80	13.28%	8.68%	11.54%	11.98%
H2O America (SJW Group)	HTO	4.60%	0.75	13.28%	8.68%	11.11%	11.65%
Mean						11.37%	11.85%
Median						11.32%	11.81%

## Notes:

[1] Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025, at 14

[2] Value Line

[3] Exhibit AEB-6

[4] Equals [3]-[1]

[5] Equals [1] + [2] x [4]

[6] Equals [1] + 0.25 x ([4]) + 0.75 x ([2] x [4])

**CAPITAL ASSET PRICING MODEL  
CURRENT RISK FREE RATE AND LONG-TERM VALUE LINE BETA**

	[1]	[2]	[3]	[4]	[5]	[6]	
Company	Ticker	Current 30-day average of 30-year U.S. Treasury bond yield	Beta	Market Return	Market Risk Premium	Cost of Equity: CAPM	Cost of Equity: ECAPM
Atmos Energy Corporation	ATO	4.91%	0.76	13.28%	8.36%	11.28%	11.78%
Chesapeake Utilities Corporation	CPK	4.91%	0.72	13.28%	8.36%	10.96%	11.54%
NiSource Inc.	NI	4.91%	0.78	13.28%	8.36%	11.45%	11.91%
Northwest Natural Gas Company	NWN	4.91%	0.73	13.28%	8.36%	10.99%	11.56%
ONE Gas, Inc.	OGS	4.91%	0.75	13.28%	8.36%	11.19%	11.71%
Southwest Gas Corporation	SWX	4.91%	0.83	13.28%	8.36%	11.86%	12.22%
American States Water Company	AWR	4.91%	0.70	13.28%	8.36%	10.77%	11.40%
California Water Service Group	CWT	4.91%	0.72	13.28%	8.36%	10.90%	11.49%
Middlesex Water Company	MSEX	4.91%	0.74	13.28%	8.36%	11.12%	11.66%
H2O America (SJW Group)	HTO	4.91%	0.77	13.28%	8.36%	11.35%	11.83%
Mean						11.19%	11.71%
Median						11.15%	11.68%

## Notes:

[1] Bloomberg Professional as of April 30, 2026

[2] Exhibit AEB-5

[3] Exhibit AEB-6

[4] Equals [3]-[1]

[5] Equals [1] + [2] x [4]

[6] Equals [1] + 0.25 x ([4]) + 0.75 x ([2] x [4])

**CAPITAL ASSET PRICING MODEL**  
**NEAR-TERM PROJECTED RISK FREE RATE AND LONG-TERM VALUE LINE BETA**

	[1]	[2]	[3]	[4]	[5]	[6]	
Company	Ticker	Near-term projected 30-year U.S. Treasury bond yield (Q3 2026 - Q3 2027)	Beta	Market Return	Market Risk Premium	Cost of Equity: CAPM	Cost of Equity: ECAPM
Atmos Energy Corporation	ATO	4.82%	0.76	13.28%	8.46%	11.26%	11.76%
Chesapeake Utilities Corporation	CPK	4.82%	0.72	13.28%	8.46%	10.93%	11.52%
NiSource Inc.	NI	4.82%	0.78	13.28%	8.46%	11.43%	11.89%
Northwest Natural Gas Company	NWN	4.82%	0.73	13.28%	8.46%	10.97%	11.54%
ONE Gas, Inc.	OGS	4.82%	0.75	13.28%	8.46%	11.16%	11.69%
Southwest Gas Corporation	SWX	4.82%	0.83	13.28%	8.46%	11.85%	12.20%
American States Water Company	AWR	4.82%	0.70	13.28%	8.46%	10.74%	11.37%
California Water Service Group	CWT	4.82%	0.72	13.28%	8.46%	10.87%	11.47%
Middlesex Water Company	MSEX	4.82%	0.74	13.28%	8.46%	11.10%	11.64%
H2O America (SJW Group)	HTO	4.82%	0.77	13.28%	8.46%	11.33%	11.81%
Mean						11.16%	11.69%
Median						11.13%	11.67%

## Notes:

[1] Blue Chip Financial Forecasts, Vol. 45, No. 5, May 1, 2026, at 2

[2] Exhibit AEB-5

[3] Exhibit AEB-6

[4] Equals [3]-[1]

[5] Equals [1] + [2] x [4]

[6] Equals [1] + 0.25 x ([4]) + 0.75 x ([2] x [4])

**CAPITAL ASSET PRICING MODEL**  
**LONG-TERM PROJECTED RISK FREE RATE AND LONG-TERM VALUE LINE BETA**

	[1]	[2]	[3]	[4]	[5]	[6]	
Company	Ticker	Projected 30-year U.S. Treasury bond yield (2027 - 2031)	Beta	Market Return	Market Risk Premium	Cost of Equity: CAPM	Cost of Equity: ECAPM
Atmos Energy Corporation	ATO	4.60%	0.76	13.28%	8.68%	11.21%	11.73%
Chesapeake Utilities Corporation	CPK	4.60%	0.72	13.28%	8.68%	10.87%	11.47%
NiSource Inc.	NI	4.60%	0.78	13.28%	8.68%	11.38%	11.86%
Northwest Natural Gas Company	NWN	4.60%	0.73	13.28%	8.68%	10.91%	11.50%
ONE Gas, Inc.	OGS	4.60%	0.75	13.28%	8.68%	11.11%	11.65%
Southwest Gas Corporation	SWX	4.60%	0.83	13.28%	8.68%	11.81%	12.18%
American States Water Company	AWR	4.60%	0.70	13.28%	8.68%	10.67%	11.32%
California Water Service Group	CWT	4.60%	0.72	13.28%	8.68%	10.81%	11.42%
Middlesex Water Company	MSEX	4.60%	0.74	13.28%	8.68%	11.04%	11.60%
H2O America (SJW Group)	HTO	4.60%	0.77	13.28%	8.68%	11.27%	11.78%
Mean						11.11%	11.65%
Median						11.07%	11.62%

## Notes:

[1] Blue Chip Financial Forecasts, Vol. 44, No. 12, December 1, 2025, at 14

[2] Exhibit AEB-5

[3] Exhibit AEB-6

[4] Equals [3]-[1]

[5] Equals [1] + [2] x [4]

[6] Equals [1] + 0.25 x ([4]) + 0.75 x ([2] x [4])

## HISTORICAL VALUE LINE BETA

		[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]	[14]
Company	Ticker	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Average
Atmos Energy Corporation	ATO	0.80	0.80	0.80	0.70	0.70	0.60	0.60	0.80	0.80	0.80	0.85	0.90	0.75	0.76
Chesapeake Utilities Corporation	CPK	0.70	0.65	0.65	0.65	0.70	0.65	0.65	0.80	0.80	0.80	0.80	0.85	0.70	0.72
NiSource Inc.	NI	0.85	0.85	NMF	NMF	0.60	0.50	0.55	0.85	0.85	0.85	0.90	0.95	0.85	0.78
Northwest Natural Gas Company	NWN	0.65	0.70	0.65	0.65	0.70	0.60	0.60	0.80	0.85	0.80	0.80	0.90	0.75	0.73
ONE Gas, Inc.	OGS				0.70	0.70	0.65	0.65	0.80	0.80	0.80	0.80	0.85	0.75	0.75
Southwest Gas Corporation	SWX	0.80	0.85	0.80	0.75	0.80	0.70	0.70	0.95	0.95	0.90	0.90	0.95	0.75	0.83
American States Water Company	AWR	0.65	0.70	0.70	0.75	0.80	0.70	0.65	0.65	0.65	0.65	0.70	0.75	0.75	0.70
California Water Service Group	CWT	0.60	0.70	0.75	0.75	0.80	0.70	0.70	0.65	0.70	0.70	0.70	0.75	0.80	0.72
Middlesex Water Company	MSEX	0.75	0.70	0.70	0.75	0.80	0.75	0.75	0.75	0.70	0.70	0.75	0.80	0.75	0.74
H2O America (SJW Group)	HTO	0.85	0.85	0.75	0.75	0.70	0.60	0.60	0.85	0.80	0.80	0.85	0.85	0.75	0.77
Mean		0.74	0.76	0.73	0.72	0.73	0.65	0.65	0.79	0.79	0.78	0.81	0.86	0.76	0.75

## Notes:

- [1] Value Line, dated December 26, 2013  
[2] Value Line, dated December 31, 2014  
[3] Value Line, dated December 30, 2015  
[4] Value Line, dated December 29, 2016  
[5] Value Line, dated December 28, 2017  
[6] Value Line, dated December 27, 2018  
[7] Value Line, dated December 26, 2019  
[8] Value Line, dated December 30, 2020  
[9] Value Line, dated December 29, 2021  
[10] Value Line, dated December 30, 2022  
[11] Value Line, Dated December 29, 2023  
[12] Value Line, Dated December 27, 2024  
[13] Value Line, Dated December 26, 2025  
[14] Average ([1] - [13])

## MARKET RETURN DERIVED FROM S&amp;P 500 INDEX

[1] Estimate of the S&P 500 Dividend Yield	1.31%
[2] Estimate of the S&P 500 Growth Rate	11.89%
[3] S&P 500 Estimated Required Market Return	13.28%

Name	Ticker	Shares Outst'g	Price	Market Capitalization	Weight in Index	Estimated Dividend Yield	Cap-Weighted Dividend Yield	Long-Term Growth Est.	Cap-Weighted
									Long-Term Growth Est.
Agilent Technologies Inc	A	282.602	115.55	32,654.70	0.07%	0.88%	0.00%	7.74%	0.01%
Apple Inc	AAPL	14681.140	271.35	3,983,727.34	7.98%	0.40%	0.03%	11.91%	0.95%
AbbVie Inc	ABBV	1768.762	211.32	373,774.87	0.75%	3.27%	0.02%	16.43%	0.12%
Airbnb Inc	ABNB	418.898	140.36	58,796.50	0.12%			14.56%	0.02%
Abbott Laboratories	ABT	1741.812	90.79	158,139.15	0.32%	2.78%	0.01%	8.17%	0.03%
Arch Capital Group Ltd	ACGL	352.900	94.46	33,334.93	0.07%			4.23%	0.00%
Accenture PLC	ACN	615.307	178.71	109,961.47	0.22%	3.65%	0.01%	5.50%	0.01%
Adobe Inc	ADBE	404.200	246.1	99,473.62	0.20%			14.73%	0.03%
Analog Devices Inc	ADI	488.204	402.26	196,385.01	0.39%	1.09%	0.00%	17.17%	0.07%
Archer-Daniels-Midland Co	ADM	481.878	74.54	35,919.16	0.07%	2.79%	0.00%	12.96%	0.01%
Automatic Data Processing Inc	ADP	399.734	211.94	84,719.68	0.17%	3.21%	0.01%	6.50%	0.01%
Autodesk Inc	ADSK	211.325	237	50,084.10	0.10%			18.57%	0.02%
Ameren Corp	AEE	276.653	113.65	31,441.64	0.06%	2.64%	0.00%	7.89%	0.00%
American Electric Power Co Inc	AEP	543.563	137.11	74,527.99	0.15%	2.77%	0.00%	7.03%	0.01%
AES Corp/The	AES	713.072	14.2741	10,178.46		4.93%		30.00%	
Aflac Inc	AFL	515.184	113.67	58,560.93	0.12%	2.15%	0.00%	7.53%	0.01%
American International Group Inc	AIG	534.867	74.8	40,008.03	0.08%	2.67%	0.00%	12.46%	0.01%
Assurant Inc	AIZ	49.705	236.27	11,743.78	0.02%	1.49%	0.00%	9.50%	0.00%
Arthur J Gallagher & Co	AJG	256.888	206.4	53,021.70	0.11%	1.36%	0.00%	15.50%	0.02%
Akamai Technologies Inc	AKAM	145.014	102.98	14,933.54	0.03%			8.00%	0.00%
Albemarle Corp	ALB	117.651	196.7	23,141.87		0.82%		90.56%	
Align Technology Inc	ALGN	71.617	176.01	12,605.36	0.03%			11.15%	0.00%
Allstate Corp/The	ALL	257.421	217.26	55,927.27	0.11%	1.99%	0.00%	9.77%	0.01%
Allegion plc	ALLE	85.936	137.48	11,814.46	0.02%	1.60%	0.00%	6.01%	0.00%
Applied Materials Inc	AMAT	793.610	394.49	313,071.16	0.63%	0.54%	0.00%	14.45%	0.09%
Amcor PLC	AMCR	462.046	38.04	17,576.22	0.04%	6.83%	0.00%	8.32%	0.00%
Advanced Micro Devices Inc	AMD	1630.339	354.49	577,938.79				36.53%	
AMETEK Inc	AME	229.203	235.5	53,977.31	0.11%	0.58%	0.00%	8.79%	0.01%
Amgen Inc	AMGN	539.686	346.25	186,866.10	0.37%	2.91%	0.01%	4.54%	0.02%
Ameriprise Financial Inc	AMP	90.100	474.79	42,778.58	0.09%	1.43%	0.00%	11.56%	0.01%
American Tower Corp	AMT	465.893	182.71	85,123.32	0.17%	3.92%	0.01%	3.13%	0.01%
Amazon.com Inc	AMZN	10757.109	265.06	2,851,279.43	5.71%			17.82%	1.02%
Arista Networks Inc	ANET	1259.169	172.71	217,471.15	0.44%			15.47%	0.07%
Aon PLC	AON	213.574	310.83	66,385.07	0.13%	1.06%	0.00%	8.70%	0.01%
A O Smith Corp	AOS	112.377	61.84	6,949.37	0.01%	2.33%	0.00%	7.50%	0.00%
APA Corp	APA	353.400	40.73	14,394.00		2.46%		-0.81%	
Air Products and Chemicals Inc	APD	222.681	300.05	66,815.34	0.13%	2.41%	0.00%	6.00%	0.01%
Amphenol Corp	APH	1229.431	147.27	181,058.26		0.68%		23.76%	
Apollo Global Management Inc	APO	576.519	128.72	74,209.53	0.15%	1.58%	0.00%	12.72%	0.02%
AppLovin Corp	APP	306.087	446.35	136,621.90				38.83%	
Aptiv PLC	APTIV	213.141	60.26	12,843.90	0.03%			11.79%	0.00%
Alexandria Real Estate Equities Inc	ARE	174.269	40.51	7,059.66		7.11%		-5.91%	
Ares Management Corp	ARES	222.024	117.4	26,065.58		4.60%		24.65%	
Atmos Energy Corp	ATO	165.439	189.98	31,430.09	0.06%	2.11%	0.00%	8.33%	0.01%
AvalonBay Communities Inc	AVB	139.259	183	25,484.39	0.05%	3.89%	0.00%	4.55%	0.00%
Broadcom Inc	AVGO	4734.668	417.43	1,976,392.54		0.62%		37.46%	
Avery Dennison Corp	AVY	76.917	163.93	12,609.01	0.03%	2.44%	0.00%	4.88%	0.00%
American Water Works Co Inc	AWK	195.281	128.42	25,077.92	0.05%	2.79%	0.00%	7.22%	0.00%
Axon Enterprise Inc	AXON	80.572	401.76	32,370.69				32.37%	
American Express Co	AXP	682.326	323.05	220,425.56	0.44%	1.18%	0.01%	13.11%	0.06%
AutoZone Inc	AZO	16.477	3704.03	61,030.64	0.12%			9.86%	0.01%
Boeing Co/The	BA	788.302	229.03	180,544.88				128.76%	
Bank of America Corp	BAC	7145.709	53.46	382,009.61	0.76%	2.10%	0.02%	9.00%	0.07%
Ball Corp	BALL	266.153	61.08	16,256.63	0.03%	1.31%	0.00%	12.13%	0.00%
Baxter International Inc	BAX	516.469	17.58	9,079.53		0.23%		-1.59%	
Best Buy Co Inc	BBY	209.113	60.49	12,649.22	0.03%	6.35%	0.00%	3.48%	0.00%
Becton Dickinson & Co	BDX	284.742	149.04	42,437.92	0.08%	2.82%	0.00%	4.31%	0.00%
Franklin Resources Inc	BEN	519.637	29.97	15,573.53	0.03%	4.40%	0.00%	9.18%	0.00%

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Brown-Forman Corp	BF/B	290.262	25.77	7,480.06	0.01%	3.59%	0.00%	1.81%	0.00%
Bunge Global SA	BG	194.018	127.07	24,653.88	0.05%	2.27%	0.00%	3.00%	0.00%
Biogen Inc	BIIB	147.637	189.28	27,944.75	0.06%			2.74%	0.00%
Bank of New York Mellon Corp/The	BK	686.379	134.37	92,228.75	0.18%	1.58%	0.00%	14.30%	0.03%
Booking Holdings Inc	BKNG	774.878	168.36	130,458.53	0.26%	1.00%	0.00%	14.84%	0.04%
Baker Hughes Co	BKR	992.069	69.67	69,117.43	0.14%	1.32%	0.00%	12.14%	0.02%
Builders FirstSource Inc	BLDR	107.560	79.09	8,506.91	0.02%			3.64%	0.00%
Blackrock Inc	BLK	155.365	1065.6	165,556.91	0.33%	2.15%	0.01%	12.02%	0.04%
Bristol-Myers Squibb Co	BMJ	2042.071	60.59	123,729.10	0.25%	4.16%	0.01%	9.50%	0.02%
Broadridge Financial Solutions Inc	BR	115.658	153.98	17,809.07	0.04%	2.53%	0.00%	9.50%	0.00%
Berkshire Hathaway Inc	BRK/B	1390.722	473.6	658,646.13	1.32%			9.50%	0.13%
Brown & Brown Inc	BRO	338.948	60.15	20,387.71	0.04%	1.10%	0.00%	7.16%	0.00%
Boston Scientific Corp	BSX	1486.175	57.61	85,618.55	0.17%			10.78%	0.02%
Blackstone Inc	BX	785.497	125.58	98,642.72	0.20%	3.69%	0.01%	19.00%	0.04%
BXP Inc	BXP	158.676	58.46	9,276.20	0.02%	4.79%	0.00%	0.68%	0.00%
Citigroup Inc	C	1714.907	127.98	219,473.86		1.88%		24.31%	
Conagra Brands Inc	CAG	478.437	14.35	6,865.57		9.76%		-6.05%	
Cardinal Health Inc	CAH	234.206	192.88	45,173.63	0.09%	1.06%	0.00%	14.30%	0.01%
Carrier Global Corp	CARR	830.580	67.17	55,790.09	0.11%	1.43%	0.00%	10.20%	0.01%
Casey's General Stores Inc	CASY	36.959	821.58	30,364.80	0.06%	0.28%	0.00%	15.36%	0.01%
Caterpillar Inc	CAT	465.287	890.11	414,156.91	0.83%	0.68%	0.01%	17.18%	0.14%
Chubb Ltd	CB	387.860	327	126,830.26	0.25%	1.19%	0.00%	6.81%	0.02%
Cboe Global Markets Inc	CBOE	104.742	300.09	31,432.11	0.06%	0.96%	0.00%	14.30%	0.01%
CBRE Group Inc	CBRE	292.817	142.73	41,793.71	0.08%			9.00%	0.01%
Crown Castle Inc	CCI	436.367	88.78	38,740.69	0.08%	4.79%	0.00%	4.00%	0.00%
Carnival Corp	CCL	1239.000	26.51	32,845.90		2.26%			
Cadence Design Systems Inc	CDNS	276.092	329.59	90,997.19	0.18%			13.77%	0.03%
CDW Corp/DE	CDW	127.974	136.91	17,520.98	0.04%	1.84%	0.00%	6.88%	0.00%
Constellation Energy Corp	CEG	362.295	313	113,398.23		0.55%		21.62%	
CF Industries Holdings Inc	CF	153.616	124.2	19,079.16		1.61%		-13.27%	
Citizens Financial Group Inc	CFG	424.994	65.05	27,645.85	0.06%	2.83%	0.00%	18.71%	0.01%
Church & Dwight Co Inc	CHD	236.875	97.06	22,991.10	0.05%	1.27%	0.00%	7.11%	0.00%
CH Robinson Worldwide Inc	CHRW	117.850	181.81	21,426.38	0.04%	1.39%	0.00%	14.72%	0.01%
Charter Communications Inc	CHTR	122.985	165.17	20,313.36	0.04%			12.16%	0.00%
Cigna Group/The	CI	264.532	290.58	76,867.82	0.15%	2.15%	0.00%	9.19%	0.01%
Ciena Corp	CIEN	141.398	527.58	74,598.98				41.82%	
Cincinnati Financial Corp	CINF	154.687	163.6	25,306.75	0.05%	2.30%	0.00%	7.43%	0.00%
Colgate-Palmolive Co	CL	802.302	85.36	68,484.49	0.14%	2.48%	0.00%	7.37%	0.01%
Clorox Co/The	CLX	120.921	96.44	11,661.65	0.02%	5.14%	0.00%	1.51%	0.00%
Comcast Corp	CMCSA	3562.784	27.04	96,337.68	0.19%	4.88%	0.01%	1.51%	0.00%
CME Group Inc	CME	362.356	287.82	104,293.36	0.21%	1.81%	0.00%	5.76%	0.01%
Chipotle Mexican Grill Inc	CMG	1282.734	33.99	43,600.13	0.09%			13.60%	0.01%
Cummins Inc	CMI	138.257	671.01	92,772.11	0.19%	1.19%	0.00%	11.15%	0.02%
CMS Energy Corp	CMS	308.920	76.74	23,706.49	0.05%	2.97%	0.00%	7.71%	0.00%
Centene Corp	CNC	493.797	53.69	26,511.96				28.78%	
CenterPoint Energy Inc	CNP	652.872	43.65	28,497.84	0.06%	2.11%	0.00%	8.01%	0.00%
Capital One Financial Corp	COF	632.571	191.3	121,010.91	0.24%	1.67%	0.00%	13.03%	0.03%
Coherent Corp	COHR	187.482	319.71	59,939.82				38.12%	
Coinbase Global Inc	COIN	223.041	187.77	41,880.46	0.08%			19.07%	0.02%
Cooper Cos Inc/The	COO	195.114	62.9	12,272.70	0.02%			8.70%	0.00%
ConocoPhillips	COP	1218.294	125.78	153,237.02	0.31%	2.67%	0.01%	2.50%	0.01%
Cencora Inc	COR	194.531	308.01	59,917.39	0.12%	0.78%	0.00%	8.46%	0.01%
Costco Wholesale Corp	COST	443.653	1013.06	449,446.64	0.90%	0.58%	0.01%	10.59%	0.10%
Corpay Inc	CPAY	66.132	306.47	20,267.47	0.04%			13.06%	0.01%
Campbell's Company/The	CPB	298.146	20.79	6,198.47		7.50%		-1.47%	
Copart Inc	CPRT	963.308	33.11	31,895.14	0.06%			7.00%	0.00%
Camden Property Trust	CPT	104.727	105.02	10,998.43		4.04%		-1.66%	
CRH PLC	CRH	668.200	118.42	79,128.27	0.16%	1.32%	0.00%	9.98%	0.02%
Charles River Laboratories International Inc	CRL	49.342	166.97	8,238.63	0.02%			6.21%	0.00%
Salesforce Inc	CRM	818.054	176.53	144,411.03		1.00%		21.00%	
CrowdStrike Holdings Inc	CRWD	253.614	445.75	113,048.48				30.00%	
Cisco Systems Inc	CSCO	3949.893	91.5	361,415.21	0.72%	1.84%	0.01%	7.40%	0.05%
CoStar Group Inc	CSGP	408.356	34.61	14,133.19				30.78%	
CSX Corp	CSX	1858.139	45.43	84,415.25	0.17%	1.23%	0.00%	11.64%	0.02%
Cintas Corp	CTAS	400.087	174.71	69,899.22	0.14%	1.03%	0.00%	12.18%	0.02%
Coterra Energy Inc	CTRA	759.353	35.91	27,268.35	0.05%	2.45%	0.00%	3.00%	0.00%
Cognizant Technology Solutions Corp	CTSH	473.869	52.9	25,067.69	0.05%	2.50%	0.00%	9.00%	0.00%

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Corteva Inc	CTVA	671.357	81.01	54,386.59	0.11%	0.89%	0.00%	10.36%	0.01%
Carvana Co	CVNA	143.258	395.8	56,701.39	0.11%			1.83%	0.00%
CVS Health Corp	CVS	1281.604	83.29	106,744.83	0.21%	3.19%	0.01%	7.13%	0.02%
Chevron Corp	CVX	1991.899	193.31	385,053.96	0.77%	3.68%	0.03%	9.81%	0.08%
Dominion Energy Inc	D	878.965	64.5	56,693.22	0.11%	4.14%	0.00%	6.02%	0.01%
Delta Air Lines Inc	DAL	656.994	67.99	44,669.05	0.09%	1.10%	0.00%	9.00%	0.01%
DoorDash Inc	DASH	411.364	168.65	69,376.58				39.94%	
DuPont de Nemours Inc	DD	409.867	45.66	18,714.55	0.04%	1.75%	0.00%	11.52%	0.00%
Datadog Inc	DDOG	330.776	132.19	43,725.26	0.09%			19.94%	0.02%
Deere & Co	DE	270.107	589.87	159,328.18	0.32%	1.10%	0.00%	9.67%	0.03%
Deckers Outdoor Corp	DECK	141.950	102.2	14,507.29	0.03%			8.69%	0.00%
Dell Technologies Inc	DELL	325.655	208.95	68,045.53	0.14%	1.21%	0.00%	15.59%	0.02%
Dollar General Corp	DG	220.226	115.88	25,519.83	0.05%	2.04%	0.00%	7.41%	0.00%
Quest Diagnostics Inc	DGX	110.696	194.2	21,497.25	0.04%	1.77%	0.00%	7.52%	0.00%
DR Horton Inc	DHI	283.580	153.86	43,631.56	0.09%	1.17%	0.00%	5.87%	0.01%
Danaher Corp	DHR	707.771	178.95	126,655.55	0.25%	0.89%	0.00%	6.25%	0.02%
Walt Disney Co/The	DIS	1771.520	103.75	183,795.18	0.37%	1.45%	0.01%	13.91%	0.05%
Digital Realty Trust Inc	DLR	348.955	200.94	70,119.11	0.14%	2.43%	0.00%	7.07%	0.01%
Dollar Tree Inc	DLTR	197.298	97.11	19,159.63				20.44%	
Healthpeak Properties Inc	DOC	695.257	16.17	11,242.30	0.02%	7.54%	0.00%	5.09%	0.00%
Dover Corp	DOV	134.661	226.41	30,488.69	0.06%	0.92%	0.00%	7.84%	0.00%
Dow Inc	DOW	720.741	40.49	29,182.82		3.46%		36.23%	
Domino's Pizza Inc	DPZ	33.262	339.42	11,289.74	0.02%	2.35%	0.00%	12.83%	0.00%
Darden Restaurants Inc	DRI	114.535	200.56	22,971.14	0.05%	2.99%	0.00%	10.31%	0.00%
DTE Energy Co	DTE	208.028	151.69	31,555.79	0.06%	3.07%	0.00%	5.72%	0.00%
Duke Energy Corp	DUK	778.217	129.55	100,817.97	0.20%	3.29%	0.01%	6.25%	0.01%
DaVita Inc	DVA	65.944	155.14	10,230.60	0.02%			18.16%	0.00%
Devon Energy Corp	DVN	621.440	51.37	31,923.39	0.06%	1.87%	0.00%	4.79%	0.00%
Dexcom Inc	DXCM	385.873	59.55	22,978.74				20.97%	
Electronic Arts Inc	EA	250.254	202.37	50,643.84	0.10%	0.38%	0.00%	9.50%	0.01%
eBay Inc	EBAY	444.000	103.48	45,945.12	0.09%	1.20%	0.00%	12.91%	0.01%
Ecolab Inc	ECL	282.424	260.6	73,599.63	0.15%	1.12%	0.00%	10.43%	0.02%
Consolidated Edison Inc	ED	368.421	111.49	41,075.29	0.08%	3.18%	0.00%	6.69%	0.01%
Equifax Inc	EFX	119.072	173.94	20,711.45	0.04%	1.29%	0.00%	10.30%	0.00%
Everest Group Ltd	EG	39.800	356.76	14,199.05	0.03%	2.24%	0.00%	9.49%	0.00%
Edison International	EIX	384.794	69.49	26,739.33	0.05%	5.05%	0.00%	8.03%	0.00%
Estee Lauder Cos Inc/The	EL	247.220	76.71	18,964.22		1.83%		23.64%	
Elevance Health Inc	ELV	217.162	376.42	81,744.26	0.16%	1.83%	0.00%	4.40%	0.01%
EMCOR Group Inc	EME	44.440	891.67	39,626.06	0.08%	0.18%	0.00%	16.50%	0.01%
Emerson Electric Co	EMR	562.000	140.44	78,927.28	0.16%	1.58%	0.00%	11.47%	0.02%
EOG Resources Inc	EOG	535.716	140.57	75,305.57	0.15%	2.90%	0.00%	5.11%	0.01%
EPAM Systems Inc	EPAM	52.444	113.78	5,967.11	0.01%			9.00%	0.00%
Equinix Inc	EQIX	98.624	1082.83	106,793.30	0.21%	1.91%	0.00%	18.26%	0.04%
Equity Residential	EQR	374.672	65.38	24,496.04	0.05%	4.30%	0.00%	3.62%	0.00%
EQT Corp	EQT	625.478	60.08	37,578.72	0.08%	1.10%	0.00%	11.03%	0.01%
Erie Indemnity Co	ERIE	46.189	218.93	10,112.17	0.02%	2.67%	0.00%	18.00%	0.00%
Eversource Energy	ES	375.845	70.7	26,572.27	0.05%	4.46%	0.00%	4.11%	0.00%
Essex Property Trust Inc	ESS	64.263	263.21	16,914.63	0.03%	3.94%	0.00%	4.25%	0.00%
Eaton Corp PLC	ETN	387.985	433.01	168,001.53	0.34%	1.02%	0.00%	13.50%	0.05%
Entergy Corp	ETR	457.799	117.27	53,686.05	0.11%	2.18%	0.00%	7.35%	0.01%
Evergy Inc	EVRG	229.746	82.84	19,032.15	0.04%	3.36%	0.00%	7.79%	0.00%
Edwards Lifesciences Corp	EW	576.542	83.5	48,141.23	0.10%			10.28%	0.01%
Exelon Corp	EXC	1023.175	45.99	47,055.82	0.09%	3.65%	0.00%	6.00%	0.01%
Expand Energy Corp	EXE	239.229	102.15	24,437.23		2.25%			
Expeditors International of Washington Inc	EXPD	132.984	147.89	19,667.01	0.04%	1.04%	0.00%	4.99%	0.00%
Expedia Group Inc	EXPE	114.499	248.37	28,438.02		0.77%		20.10%	
Extra Space Storage Inc	EXR	211.197	143.33	30,270.88	0.06%	4.52%	0.00%	0.77%	0.00%
Ford Motor Co	F	3913.841	12.08	47,279.19		4.97%		22.42%	
Diamondback Energy Inc	FANG	281.312	205.63	57,846.13	0.12%	2.04%	0.00%	12.83%	0.01%
Fastenal Co	FAST	1148.035	44.93	51,581.22	0.10%	2.14%	0.00%	9.62%	0.01%
Freight-McMoRan Inc	FCX	1437.531	57.78	83,060.52		1.04%		23.79%	
FactSet Research Systems Inc	FDS	36.431	227.58	8,291.00	0.02%	1.93%	0.00%	5.66%	0.00%
FedEx Corp	FDX	238.607	403.31	96,232.49	0.19%	1.44%	0.00%	9.63%	0.02%
FirstEnergy Corp	FE	577.126	47.52	27,425.04	0.05%	3.91%	0.00%	6.31%	0.00%
F5 Inc	FFIV	56.753	323.9	18,382.30	0.04%			5.95%	0.00%
Fair Isaac Corp	FICO	23.191	1025	23,770.68				24.63%	
Fidelity National Information Services Inc	FIS	516.869	46.53	24,049.92	0.05%	3.78%	0.00%	10.00%	0.00%

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Fiserv Inc	FISV	533.949	62.65	33,451.88	0.07%			5.50%	0.00%
Fifth Third Bancorp	FITB	905.564	50.76	45,966.40	0.09%	3.15%	0.00%	10.00%	0.01%
Comfort Systems USA Inc	FIX	35.202	1840.25	64,781.25		0.17%		23.50%	
Fox Corp	FOX	224.702	57.02	12,812.52	0.03%	0.98%	0.00%	1.78%	0.00%
Fox Corp	FOXA	200.694	63.49	12,742.05	0.03%	0.88%	0.00%	4.89%	0.00%
Federal Realty Investment Trust	FRT	86.388	110.9	9,580.45	0.02%	4.08%	0.00%	3.33%	0.00%
First Solar Inc	FSLR	107.453	201.89	21,693.76				26.00%	
Fortinet Inc	FTNT	732.102	84.31	61,723.52	0.12%			12.50%	0.02%
Fortive Corp	FTV	304.861	59.79	18,227.64	0.04%	0.40%	0.00%	6.50%	0.00%
General Dynamics Corp	GD	270.430	344.3	93,109.11	0.19%	1.85%	0.00%	11.26%	0.02%
GoDaddy Inc	GDDY	132.697	86.79	11,516.79	0.02%			5.50%	0.00%
General Electric Co	GE	1043.337	289.93	302,494.77	0.61%	0.65%	0.00%	17.09%	0.10%
GE HealthCare Technologies Inc	GEHC	454.892	60.84	27,675.62	0.06%	0.23%	0.00%	8.05%	0.00%
Gen Digital Inc	GEN	605.664	19.29	11,683.25	0.02%	2.59%	0.00%	8.50%	0.00%
GE Vernova Inc	GEV	268.720	1083.46	291,147.37		0.18%		66.80%	
Gilead Sciences Inc	GILD	1241.204	130.84	162,399.10	0.33%	2.51%	0.01%	11.22%	0.04%
General Mills Inc	GIS	533.681	35.31	18,844.28		6.91%		-4.04%	
Globe Life Inc	GL	78.445	154.3	12,103.99	0.02%	0.86%	0.00%	8.00%	0.00%
Corning Inc	GLW	859.015	164.24	141,084.60		0.68%		30.91%	
General Motors Co	GM	901.665	76.89	69,329.04	0.14%	0.94%	0.00%	12.33%	0.02%
Generac Holdings Inc	GNRC	58.812	259.23	15,245.77	0.03%			18.50%	0.01%
Alphabet Inc	GOOG	5456.000	381.94	2,083,864.64	4.17%	0.23%	0.01%	17.10%	0.71%
Alphabet Inc	GOOGL	5824.000	384.8	2,241,075.20	4.49%	0.23%	0.01%	17.69%	0.79%
Genuine Parts Co	GPC	137.625	107.23	14,757.48	0.03%	3.96%	0.00%	2.00%	0.00%
Global Payments Inc	GPN	275.243	71.96	19,806.49	0.04%	1.39%	0.00%	8.00%	0.00%
Garmin Ltd	GRMN	192.856	251.14	48,433.91	0.10%	1.67%	0.00%	8.19%	0.01%
Goldman Sachs Group Inc/The	GS	294.994	923.77	272,506.55	0.55%	1.95%	0.01%	13.14%	0.07%
WW Grainger Inc	GWG	47.330	1161.35	54,966.68	0.11%	0.86%	0.00%	6.88%	0.01%
Halliburton Co	HAL	835.398	42.3	35,337.32	0.07%	1.61%	0.00%	8.69%	0.01%
Hasbro Inc	HAS	141.522	95.84	13,563.42	0.03%	2.92%	0.00%	7.20%	0.00%
Huntington Bancshares Inc/OH	HBAN	2027.131	16.76	33,974.71	0.07%	3.70%	0.00%	9.51%	0.01%
HCA Healthcare Inc	HCA	221.840	434.45	96,378.30	0.19%	0.72%	0.00%	9.84%	0.02%
Home Depot Inc/The	HD	996.028	328.8	327,493.89	0.66%	2.83%	0.02%	5.80%	0.04%
Hartford Insurance Group Inc/The	HIG	274.131	136.81	37,503.84	0.08%	1.75%	0.00%	5.22%	0.00%
Huntington Ingalls Industries Inc	HII	39.377	364.29	14,344.71	0.03%	1.52%	0.00%	15.28%	0.00%
Hilton Worldwide Holdings Inc	HLT	227.648	324.07	73,774.01	0.15%	0.19%	0.00%	12.97%	0.02%
Honeywell International Inc	HON	633.653	214.33	135,810.87	0.27%	2.22%	0.01%	7.69%	0.02%
Robinhood Markets Inc	HOOD	791.185	72.89	57,669.45				23.14%	
Hewlett Packard Enterprise Co	HPE	1326.854	28.77	38,173.59	0.08%	1.98%	0.00%	12.68%	0.01%
HP Inc	HPQ	914.550	20.86	19,077.52	0.04%	5.75%	0.00%	3.14%	0.00%
Hormel Foods Corp	HRL	550.284	21.47	11,814.60	0.02%	5.45%	0.00%	5.81%	0.00%
Henry Schein Inc	HSIC	114.748	74.59	8,559.06	0.02%			8.76%	0.00%
Host Hotels & Resorts Inc	HST	687.333	21.13	14,523.35	0.03%	3.79%	0.00%	4.34%	0.00%
Hershey Co/The	HSY	148.230	185.74	27,532.21	0.06%	3.13%	0.00%	13.00%	0.01%
Hubbell Inc	HUBB	53.025	508.17	26,945.58	0.05%	1.12%	0.00%	7.50%	0.00%
Humana Inc	HUM	120.062	236.44	28,387.34	0.06%	1.50%	0.00%	9.20%	0.01%
Howmet Aerospace Inc	HWM	400.714	243.04	97,389.42		0.20%		20.50%	
Interactive Brokers Group Inc	IBKR	445.616	79.5	35,426.51	0.07%	0.44%	0.00%	14.41%	0.01%
International Business Machines Corp	IBM	939.885	230.98	217,094.70	0.43%	2.93%	0.01%	7.29%	0.03%
Intercontinental Exchange Inc	ICE	565.512	158.09	89,401.87	0.18%	1.32%	0.00%	11.52%	0.02%
IDEXX Laboratories Inc	IDXX	79.519	560.8	44,594.22	0.09%			11.91%	0.01%
IDEXX Corp	IEX	74.015	217.85	16,124.18	0.03%	1.30%	0.00%	4.50%	0.00%
International Flavors & Fragrances Inc	IFF	255.438	70.2	17,931.73	0.04%	2.28%	0.00%	5.83%	0.00%
Incyte Corp	INCY	199.782	95.27	19,033.25	0.04%			18.93%	0.01%
Intel Corp	INTC	5026.000	94.48	474,856.48				47.81%	
Intuit Inc	INTU	276.550	388.5	107,439.68	0.22%	1.24%	0.00%	13.99%	0.03%
Invitation Homes Inc	INVH	594.042	28.77	17,090.59	0.03%	4.17%	0.00%	6.10%	0.00%
International Paper Co	IP	529.486	30.42	16,106.97	0.03%	6.08%	0.00%	9.50%	0.00%
IQVIA Holdings Inc	IQV	169.700	158.37	26,875.39	0.05%			7.45%	0.00%
Ingersoll Rand Inc	IR	391.337	79.86	31,252.16	0.06%	0.10%	0.00%	8.50%	0.01%
Iron Mountain Inc	IRM	297.525	125.99	37,485.13	0.08%	2.74%	0.00%	9.50%	0.01%
Intuitive Surgical Inc	ISRG	354.163	457.61	162,068.46	0.32%			15.06%	0.05%
Gartner Inc	IT	67.510	148.49	10,024.59	0.02%			6.23%	0.00%
Illinois Tool Works Inc	ITW	288.078	258.01	74,327.03	0.15%	2.50%	0.00%	8.86%	0.01%
Invesco Ltd	IVZ	443.321	26.21	11,619.44		3.28%		22.56%	
Jacobs Solutions Inc	J	117.447	129.41	15,198.78	0.03%	1.11%	0.00%	10.29%	0.00%
JB Hunt Transport Services Inc	JBHT	94.299	251.53	23,719.08	0.05%	0.72%	0.00%	12.98%	0.01%

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Jabil Inc	JBL	105.503	337.49	35,606.08	0.07%	0.09%	0.00%	15.78%	0.01%
Johnson Controls International plc	JCI	612.066	146.03	89,380.03	0.18%	1.10%	0.00%	17.45%	0.03%
Jack Henry & Associates Inc	JKHY	72.167	153.75	11,095.73	0.02%	1.59%	0.00%	6.50%	0.00%
Johnson & Johnson	JNJ	2407.217	229.85	553,298.82	1.11%	2.33%	0.03%	7.24%	0.08%
JPMorgan Chase & Co	JPM	2682.220	313.23	840,151.65	1.68%	1.92%	0.03%	9.85%	0.17%
Keurig Dr Pepper Inc	KDP	1360.559	29.4	40,000.45	0.08%	3.13%	0.00%	10.22%	0.01%
KeyCorp	KEY	1087.293	22.11	24,040.05	0.05%	3.71%	0.00%	12.92%	0.01%
Keysight Technologies Inc	KEYS	171.503	349.91	60,010.44	0.12%			12.73%	0.02%
Kraft Heinz Co/The	KHC	1185.762	22.66	26,869.37		7.06%		-0.33%	
Kimco Realty Corp	KIM	674.403	23.64	15,942.89	0.03%	4.40%	0.00%	10.16%	0.00%
KKR & Co Inc	KKR	891.551	104.34	93,024.42	0.19%	0.71%	0.00%	7.00%	0.01%
KLA Corp	KLAC	130.628	1750.35	228,643.88	0.46%	0.43%	0.00%	15.00%	0.07%
Kimberly-Clark Corp	KMB	331.940	98.43	32,672.89	0.07%	5.20%	0.00%	4.96%	0.00%
Kinder Morgan Inc	KMI	2224.826	32.87	73,130.02	0.15%	3.62%	0.01%	7.92%	0.01%
Coca-Cola Co/The	KO	4302.482	78.76	338,863.52	0.68%	2.69%	0.02%	7.36%	0.05%
Kroger Co/The	KR	612.576	68.07	41,698.02	0.08%	2.06%	0.00%	6.00%	0.01%
Kenvue Inc	KVUE	1919.916	17.53	33,656.13	0.07%	4.73%	0.00%	13.12%	0.01%
Loews Corp	L	205.768	112.61	23,171.50	0.05%	0.22%	0.00%	14.00%	0.01%
Leidos Holdings Inc	LDOS	125.929	149.22	18,791.06	0.04%	1.15%	0.00%	8.71%	0.00%
Lennar Corp	LEN	215.244	90.3	19,436.57	0.04%	2.21%	0.00%	2.46%	0.00%
Labcorp Holdings Inc	LH	82.187	256.8	21,105.63	0.04%	1.12%	0.00%	6.58%	0.00%
L3Harris Technologies Inc	LHX	186.295	320.55	59,716.85	0.12%	1.56%	0.00%	13.86%	0.02%
Lennox International Inc	LII	34.800	534.89	18,614.16	0.04%	0.97%	0.00%	11.00%	0.00%
Linde PLC	LIN	462.642	501.14	231,848.50	0.46%	1.28%	0.01%	8.17%	0.04%
Lumentum Holdings Inc	LITE	71.400	902.32	64,425.65					
Eli Lilly & Co	LLY	941.741	934.6	880,151.52	1.76%	0.74%	0.01%	20.00%	0.35%
Lockheed Martin Corp	LMT	230.564	517.97	119,425.03	0.24%	2.66%	0.01%	16.33%	0.04%
Alliant Energy Corp	LNT	258.276	73.43	18,965.24	0.04%	2.91%	0.00%	6.48%	0.00%
Lowe's Cos Inc	LOW	560.063	238.79	133,737.42	0.27%	2.01%	0.01%	4.58%	0.01%
Lam Research Corp	LRCX	1250.571	257.86	322,472.24		0.40%		26.70%	
Lululemon Athletica Inc	LULU	109.957	137.7	15,141.14	0.03%			2.00%	0.00%
Southwest Airlines Co	LUV	488.774	37.92	18,534.30		1.90%		48.52%	
Las Vegas Sands Corp	LVS	662.637	54.61	36,186.62		2.20%		20.86%	
LyondellBasell Industries NV	LYB	322.769	74.6	24,078.59		3.70%		22.59%	
Live Nation Entertainment Inc	LYV	235.125	157.94	37,135.61				81.03%	
Mastercard Inc	MA	877.036	502.92	441,079.06	0.88%	0.69%	0.01%	13.35%	0.12%
Mid-America Apartment Communities Inc	MAA	116.385	129.18	15,034.59	0.03%	4.74%	0.00%	1.09%	0.00%
Marriott International Inc/MD	MAR	264.932	361.69	95,823.25	0.19%	0.74%	0.00%	9.00%	0.02%
Masco Corp	MAS	201.734	71.82	14,488.57	0.03%	1.78%	0.00%	8.65%	0.00%
McDonald's Corp	MCD	710.828	293.59	208,691.88	0.42%	2.53%	0.01%	8.75%	0.04%
Microchip Technology Inc	MCHP	541.135	92.91	50,276.90	0.10%	1.96%	0.00%	19.73%	0.02%
McKesson Corp	MCK	122.487	815.2	99,851.78	0.20%	0.40%	0.00%	12.89%	0.03%
Moody's Corp	MCO	174.700	461.85	80,685.20	0.16%	0.89%	0.00%	11.11%	0.02%
Mondelez International Inc	MDLZ	1283.650	61.44	78,867.44	0.16%	3.26%	0.01%	7.36%	0.01%
Medtronic PLC	MDT	1283.885	80.97	103,956.17	0.21%	3.51%	0.01%	7.02%	0.01%
MetLife Inc	MET	647.046	80.1	51,828.40	0.10%	2.96%	0.00%	10.43%	0.01%
Meta Platforms Inc	META	2196.046	611.91	1,343,782.26	2.69%	0.34%	0.01%	15.42%	0.41%
MGM Resorts International	MGM	255.851	38.94	9,962.85				25.00%	
McCormick & Co Inc/MD	MKC	253.943	50.84	12,910.47	0.03%	3.78%	0.00%	5.64%	0.00%
Martin Marietta Materials Inc	MLM	60.046	619.07	37,172.62	0.07%	0.54%	0.00%	11.49%	0.01%
3M Co	MMM	521.567	146.52	76,420.03		2.13%		30.85%	
Monster Beverage Corp	MNST	977.906	77.07	75,367.22	0.15%			10.10%	0.02%
Altria Group Inc	MO	1669.891	72.65	121,317.60	0.24%	5.84%	0.01%	5.01%	0.01%
Mosaic Co/The	MOS	317.847	23.27	7,396.29	0.01%	3.78%	0.00%	10.68%	0.00%
Marathon Petroleum Corp	MPC	294.497	248.29	73,120.63	0.15%	1.61%	0.00%	10.12%	0.01%
Monolithic Power Systems Inc	MPWR	49.129	1614.41	79,314.78	0.16%	0.50%	0.00%	15.00%	0.02%
Merck & Co Inc	MRK	2469.879	109.18	269,661.41	0.54%	3.11%	0.02%	12.50%	0.07%
Moderna Inc	MRNA	396.587	45.94	18,219.20				23.66%	
Marsh & McLennan Cos Inc	MRSN	481.795	167.71	80,801.76	0.16%	2.15%	0.00%	7.75%	0.01%
Morgan Stanley	MS	1580.000	190.59	301,132.20	0.60%	2.10%	0.01%	12.57%	0.08%
MSCI Inc	MSCI	73.120	591.41	43,244.02	0.09%	1.39%	0.00%	11.36%	0.01%
Microsoft Corp	MSFT	7428.435	407.78	3,029,167.10	6.07%	0.89%	0.05%	14.96%	0.91%
Motorola Solutions Inc	MSI	166.204	439.03	72,968.37	0.15%	1.10%	0.00%	9.15%	0.01%
M&T Bank Corp	MTB	146.917	218.63	32,120.46	0.06%	2.74%	0.00%	8.88%	0.01%
Mettler-Toledo International Inc	MTD	20.249	1276.61	25,849.45	0.05%			8.88%	0.00%
Micron Technology Inc	MU	1127.734	517.16	583,218.94		0.12%		101.94%	
Norwegian Cruise Line Holdings Ltd	NCLH	459.105	18.18	8,346.54	0.02%			14.09%	0.00%

		[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
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Nasdaq Inc	NDAQ	565.541	91.91	51,978.85	0.10%	1.35%	0.00%	11.32%	0.01%
Nordson Corp	NDSN	55.784	288.45	16,090.78	0.03%	1.14%	0.00%	8.00%	0.00%
NextEra Energy Inc	NEE	2085.341	97.88	204,113.22	0.41%	2.55%	0.01%	8.05%	0.03%
Newmont Corp	NEM	1067.553	111.09	118,594.44	0.24%	0.94%	0.00%	15.45%	0.04%
Netflix Inc	NFLX	4210.799	93.61	394,172.85				22.26%	
NiSource Inc	NI	479.358	48.28	23,143.39	0.05%	2.49%	0.00%	7.86%	0.00%
NIKE Inc	NKE	1199.499	44.36	53,209.79		3.70%		-0.77%	
Northrop Grumman Corp	NOC	142.033	579.48	82,305.56	0.16%	1.59%	0.00%	7.60%	0.01%
ServiceNow Inc	NOW	1031.000	88.31	91,047.61	0.18%			17.00%	0.03%
NRG Energy Inc	NRG	214.557	155.105	33,278.80	0.07%	1.22%	0.00%	20.00%	0.01%
Norfolk Southern Corp	NSC	224.594	315.83	70,933.52	0.14%	1.71%	0.00%	8.50%	0.01%
NetApp Inc	NTAP	197.330	110.77	21,858.29	0.04%	1.88%	0.00%	6.99%	0.00%
Northern Trust Corp	NTRS	185.047	166.34	30,780.76	0.06%	1.92%	0.00%	11.29%	0.01%
Nucor Corp	NUE	227.636	225.29	51,284.14	0.10%	0.99%	0.00%	17.49%	0.02%
NVIDIA Corp	NVDA	24300.000	199.57	4,849,551.00		0.02%		35.78%	
NVR Inc	NVR	2.732	6315.87	17,253.88	0.03%			2.81%	0.00%
News Corp	NWS	184.340	30.48	5,618.69		0.66%			
News Corp	NWSA	367.818	26.32	9,680.96	0.02%	0.76%	0.00%	19.50%	0.00%
NXP Semiconductors NV	NXPI	252.471	293.59	74,122.98	0.15%	1.38%	0.00%	12.94%	0.02%
Realty Income Corp	O	932.451	64.24	59,900.63	0.12%	5.05%	0.01%	4.16%	0.00%
Old Dominion Freight Line Inc	ODFL	208.292	212.43	44,247.50	0.09%	0.55%	0.00%	9.83%	0.01%
ONEOK Inc	OKE	630.033	92.46	58,252.84	0.12%	4.63%	0.01%	12.50%	0.01%
Omnicom Group Inc	OMC	285.006	76.72	21,865.68	0.04%	4.17%	0.00%	11.47%	0.01%
ON Semiconductor Corp	ON	393.327	100.81	39,651.33	0.08%			15.01%	0.01%
Oracle Corp	ORCL	2876.046	161.39	464,165.06		1.24%		21.11%	
O'Reilly Automotive Inc	ORLY	836.699	99.4	83,167.93	0.17%			9.74%	0.02%
Otis Worldwide Corp	OTIS	383.716	77.88	29,883.81	0.06%	2.26%	0.00%	9.50%	0.01%
Occidental Petroleum Corp	OXY	991.695	60.58	60,076.89		1.72%			
Palo Alto Networks Inc	PANW	816.000	179.32	146,325.12				22.14%	
Paychex Inc	PAYX	358.291	92.63	33,188.48	0.07%	4.66%	0.00%	7.50%	0.00%
PACCAR Inc	PCAR	526.286	118.8	62,522.80	0.13%	1.18%	0.00%	9.14%	0.01%
PG&E Corp	PCG	2202.225	16.62	36,600.98	0.07%	1.20%	0.00%	9.26%	0.01%
Public Service Enterprise Group Inc	PEG	498.740	81.66	40,727.10	0.08%	3.28%	0.00%	7.27%	0.01%
PepsiCo Inc	PEP	1366.768	158.49	216,619.11	0.43%	3.59%	0.02%	5.74%	0.02%
Pfizer Inc	PFE	5688.356	26.7	151,879.11	0.30%	6.44%	0.02%	0.01%	0.00%
Principal Financial Group Inc	PFG	216.012	100.91	21,797.81	0.04%	3.25%	0.00%	7.67%	0.00%
Procter & Gamble Co/The	PG	2328.599	147.09	342,513.62	0.69%	2.96%	0.02%	3.95%	0.03%
Progressive Corp/The	PGR	584.400	201.28	117,628.03	0.24%	0.20%	0.00%	8.01%	0.02%
Parker-Hannifin Corp	PH	126.217	909.42	114,783.84	0.23%	0.88%	0.00%	10.01%	0.02%
PulteGroup Inc	PHM	190.486	122.36	23,307.91	0.05%	0.85%	0.00%	3.89%	0.00%
Packaging Corp of America	PKG	89.028	213.45	19,003.02	0.04%	2.34%	0.00%	7.31%	0.00%
Prologis Inc	PLD	932.231	142.02	132,395.40	0.27%	3.01%	0.01%	5.68%	0.02%
Palantir Technologies Inc	PLTR	2295.916	139.11	319,384.84				47.57%	
Philip Morris International Inc	PM	1558.559	165.07	257,271.31	0.52%	3.56%	0.02%	7.36%	0.04%
PNC Financial Services Group Inc/The	PNC	402.000	223	89,646.00	0.18%	3.05%	0.01%	12.03%	0.02%
Pentair PLC	PNR	161.606	80.71	13,043.18	0.03%	1.34%	0.00%	11.81%	0.00%
Pinnacle West Capital Corp	PNW	121.026	103.72	12,552.78	0.03%	3.51%	0.00%	6.31%	0.00%
Insulet Corp	PODD	69.264	172.14	11,923.06				28.35%	
Pool Corp	POOL	36.443	213.32	7,774.02	0.02%	2.44%	0.00%	3.98%	0.00%
PPG Industries Inc	PPG	222.900	108.5	24,184.65	0.05%	2.62%	0.00%	6.08%	0.00%
PPL Corp	PPL	751.307	37.44	28,128.93	0.06%	3.04%	0.00%	7.51%	0.00%
Prudential Financial Inc	PRU	347.819	98.11	34,124.49	0.07%	5.71%	0.00%	7.45%	0.01%
Public Storage	PSA	175.546	302.45	53,093.81	0.11%	3.97%	0.00%	4.96%	0.01%
Paramount Skydance Corp	PSKY	1080.241	10.24	11,061.67		1.95%		25.16%	
Phillips 66	PSX	400.935	179.15	71,827.17		2.84%		48.18%	
PTC Inc	PTC	118.996	136.3	16,219.51	0.03%			7.81%	0.00%
Quanta Services Inc	PWR	150.060	727.77	109,209.28	0.22%	0.06%	0.00%	17.11%	0.04%
PayPal Holdings Inc	PYPL	899.674	50.14	45,109.65	0.09%	1.12%	0.00%	5.91%	0.01%
Qnity Electronics Inc	Q	209.442	140.66	29,460.05		0.23%			
QUALCOMM Inc	QCOM	1054.000	179.58	189,277.32	0.38%	2.05%	0.01%	3.26%	0.01%
Royal Caribbean Cruises Ltd	RCL	268.195	263.76	70,739.11	0.14%	2.27%	0.00%	14.06%	0.02%
Regency Centers Corp	REG	183.083	77.85	14,253.04	0.03%	3.88%	0.00%	5.65%	0.00%
Regeneron Pharmaceuticals Inc	REGN	103.022	707.06	72,842.66	0.15%	0.53%	0.00%	9.87%	0.01%
Regions Financial Corp	RF	854.316	28.55	24,390.73	0.05%	3.71%	0.00%	8.58%	0.00%
Raymond James Financial Inc	RJF	194.600	158.32	30,809.07	0.06%	1.36%	0.00%	12.33%	0.01%
Ralph Lauren Corp	RL	38.655	358.64	13,863.28	0.03%	1.02%	0.00%	17.07%	0.00%
ResMed Inc	RMD	145.678	213.81	31,147.50	0.06%	1.12%	0.00%	10.11%	0.01%

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Rockwell Automation Inc	ROK	112.358	408.91	45,944.27	0.09%	1.35%	0.00%	12.23%	0.01%
Rollins Inc	ROL	481.464	55.73	26,831.97	0.05%	1.31%	0.00%	11.55%	0.01%
Roper Technologies Inc	ROP	102.400	354.81	36,332.54	0.07%	1.03%	0.00%	8.00%	0.01%
Ross Stores Inc	ROST	322.148	227.79	73,382.13	0.15%	0.78%	0.00%	9.34%	0.01%
Republic Services Inc	RSG	308.956	209.22	64,639.81	0.13%	1.19%	0.00%	8.25%	0.01%
RTX Corp	RTX	1346.683	176.07	237,110.55	0.47%	1.66%	0.01%	11.06%	0.05%
Revvity Inc	RVTY	111.803	86.62	9,684.40	0.02%	0.32%	0.00%	6.86%	0.00%
EchoStar Corp	SATS	157.527	123.14	19,397.92					
SBA Communications Corp	SBAC	106.063	221.2	23,461.14	0.05%	2.26%	0.00%	5.51%	0.00%
Starbucks Corp	SBUX	1139.700	105.33	120,044.60	0.24%	2.35%	0.01%	10.57%	0.03%
Charles Schwab Corp/The	SCHW	1738.099	91.64	159,279.43	0.32%	1.40%	0.00%	13.30%	0.04%
Sherwin-Williams Co/The	SHW	246.636	321.61	79,320.48	0.16%	0.99%	0.00%	10.43%	0.02%
J M Smucker Co/The	SJM	106.648	98.03	10,454.73	0.02%	4.49%	0.00%	4.51%	0.00%
SLB Ltd	SLB	1495.058	56.88	85,038.88	0.17%	2.07%	0.00%	6.73%	0.01%
Super Micro Computer Inc	SMCI	600.482	27.4	16,453.21				27.06%	
Snap-on Inc	SNA	51.802	383.4	19,860.86	0.04%	2.55%	0.00%	4.47%	0.00%
Sandisk Corp/DE	SNDK	147.601	1096.51	161,845.94					
Synopsys Inc	SNPS	191.562	482.6	92,447.84	0.19%			13.23%	0.02%
Southern Co/The	SO	1128.320	96.7	109,108.53	0.22%	3.14%	0.01%	7.81%	0.02%
Solventum Corp	SOLV	173.405	67.36	11,680.58	0.02%			9.40%	0.00%
Simon Property Group Inc	SPG	324.840	203.71	66,173.20	0.13%	4.32%	0.01%	3.50%	0.00%
S&P Global Inc	SPGI	296.000	431.23	127,644.08	0.26%	0.90%	0.00%	10.65%	0.03%
Sempra	SRE	653.333	95.12	62,144.99	0.12%	2.76%	0.00%	7.57%	0.01%
STERIS PLC	STE	98.075	216.88	21,270.51	0.04%	1.16%	0.00%	8.00%	0.00%
Steel Dynamics Inc	STLD	144.213	228.66	32,975.69	0.07%	0.93%	0.00%	16.16%	0.01%
State Street Corp	STT	276.767	152.84	42,301.07	0.08%	2.20%	0.00%	12.91%	0.01%
Seagate Technology Holdings PLC	STX	224.229	673.64	151,049.62		0.44%		50.16%	
Constellation Brands Inc	STZ	172.173	156.58	26,958.78	0.05%	2.63%	0.00%	3.67%	0.00%
Smurfit Westrock PLC	SW	524.254	38.39	20,126.10		4.71%		43.72%	
Stanley Black & Decker Inc	SWK	155.456	78.16	12,150.41	0.02%	4.25%	0.00%	20.00%	0.00%
Skyworks Solutions Inc	SWKS	150.406	70.17	10,553.99		4.05%		-4.65%	
Synchrony Financial	SYF	336.951	76.2	25,675.69	0.05%	1.57%	0.00%	8.83%	0.00%
Stryker Corp	SYK	382.984	315.13	120,689.83	0.24%	1.12%	0.00%	10.05%	0.02%
Sysco Corp	SYY	478.183	74.71	35,725.02	0.07%	2.94%	0.00%	6.50%	0.00%
AT&T Inc	T	6948.339	26.13	181,560.09	0.36%	4.25%	0.02%	7.50%	0.03%
Molson Coors Beverage Co	TAP	175.215	42.74	7,488.71	0.01%	4.49%	0.00%	0.82%	0.00%
TransDigm Group Inc	TDG	56.474	1159.98	65,508.20	0.13%			13.09%	0.02%
Teledyne Technologies Inc	TDY	46.329	645.85	29,921.68	0.06%			9.34%	0.01%
Bio-Techne Corp	TECH	156.453	55.32	8,655.00	0.02%	0.58%	0.00%	13.00%	0.00%
TE Connectivity PLC	TEL	291.896	211.66	61,782.67	0.12%	1.47%	0.00%	11.27%	0.01%
Teradyne Inc	TER	156.559	343.47	53,773.47		0.15%		32.71%	
Truist Financial Corp	TFC	1241.010	51.5	63,912.00	0.13%	4.04%	0.01%	9.02%	0.01%
Target Corp	TGT	454.176	129.75	58,929.37	0.12%	3.51%	0.00%	4.50%	0.01%
TJX Cos Inc/The	TJX	1105.814	156.75	173,336.39	0.35%	1.22%	0.00%	10.38%	0.04%
TKO Group Holdings Inc	TKO	74.968	186.09	13,950.73		1.68%		80.07%	
Thermo Fisher Scientific Inc	TMO	371.621	478.96	177,991.77	0.36%	0.39%	0.00%	8.05%	0.03%
T-Mobile US Inc	TMUS	1082.205	195.5	211,571.02	0.42%	2.09%	0.01%	17.00%	0.07%
Texas Pacific Land Corp	TPL	68.942	443.67	30,587.30	0.06%	0.54%	0.00%	10.00%	0.01%
Tapestry Inc	TPR	202.464	145.04	29,365.41	0.06%	1.10%	0.00%	13.92%	0.01%
Targa Resources Corp	TRGP	214.802	260.08	55,865.70	0.11%	1.92%	0.00%	17.00%	0.02%
Trimble Inc	TRMB	232.089	67.32	15,624.21	0.03%			6.50%	0.00%
T Rowe Price Group Inc	TROW	214.267	102.88	22,043.75	0.04%	5.05%	0.00%	2.88%	0.00%
Travelers Cos Inc/The	TRV	212.645	305.14	64,886.40	0.13%	1.64%	0.00%	4.62%	0.01%
Tractor Supply Co	TSCO	526.006	35.1	18,462.82	0.04%	2.74%	0.00%	8.12%	0.00%
Tesla Inc	TSLA	3755.724	381.63	1,433,296.90	2.87%			10.50%	0.30%
Tyson Foods Inc	TSN	282.070	64.07	18,072.22	0.04%	3.18%	0.00%	14.10%	0.01%
Trane Technologies PLC	TT	221.055	492.54	108,878.67	0.22%	0.85%	0.00%	12.52%	0.03%
Trade Desk Inc/The	TTD	426.989	23.59	10,072.67	0.02%			18.20%	0.00%
Take-Two Interactive Software Inc	TTWO	185.175	213.76	39,583.11				75.23%	
Texas Instruments Inc	TXN	910.093	281.08	255,808.88	0.51%	2.02%	0.01%	14.96%	0.08%
Textron Inc	TXT	173.889	95.96	16,686.39	0.03%	0.08%	0.00%	11.82%	0.00%
Tyler Technologies Inc	TYL	42.167	341.14	14,385.01	0.03%			9.00%	0.00%
United Airlines Holdings Inc	UAL	324.649	90	29,218.44	0.06%			11.00%	0.01%
Uber Technologies Inc	UBER	2036.825	74.61	151,967.50	0.30%			3.27%	0.01%
UDR Inc	UDR	324.916	36.34	11,807.43	0.02%	4.79%	0.00%	3.84%	0.00%
Universal Health Services Inc	UHS	53.781	168.27	9,049.73	0.02%	0.48%	0.00%	10.32%	0.00%
Ulta Beauty Inc	ULTA	43.560	537.48	23,412.85	0.05%			8.85%	0.00%

		[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
Name	Ticker	Shares Outst'g	Price	Market Capitalization	Weight in Index	Estimated Dividend Yield	Cap-Weighted Dividend Yield	Long-Term Growth Est.	Cap-Weighted Long-Term Growth Est.
UnitedHealth Group Inc	UNH	908.213	370.48	336,474.82	0.67%	2.39%	0.02%	6.03%	0.04%
Union Pacific Corp	UNP	593.713	269.48	159,993.84	0.32%	2.05%	0.01%	8.85%	0.03%
United Parcel Service Inc	UPS	745.633	108.8	81,124.91	0.16%	6.03%	0.01%	4.66%	0.01%
United Rentals Inc	URI	62.647	959.84	60,130.67	0.12%	0.82%	0.00%	12.13%	0.01%
US Bancorp	USB	1555.000	56.66	88,106.30	0.18%	3.67%	0.01%	9.64%	0.02%
Visa Inc	V	1659.710	329.84	547,438.72	1.10%	0.81%	0.01%	12.19%	0.13%
VICI Properties Inc	VICI	1069.030	29.2	31,215.68	0.06%	6.16%	0.00%	8.00%	0.01%
Valero Energy Corp	VLO	296.933	252.58	74,999.28	0.15%	1.90%	0.00%	10.54%	0.02%
Veralto Corp	VLTO	245.599	88.2	21,661.86	0.04%	0.59%	0.00%	8.50%	0.00%
Vulcan Materials Co	VMC	129.755	301.74	39,152.24	0.08%	0.69%	0.00%	10.18%	0.01%
Verisk Analytics Inc	VRSK	131.022	184.49	24,172.22	0.05%	1.08%	0.00%	9.24%	0.00%
VeriSign Inc	VRSN	91.000	268.66	24,448.06	0.05%	1.21%	0.00%	8.00%	0.00%
Vertiv Holdings Co	VRT	384.109	328.49	126,175.91		0.08%		31.79%	
Vertex Pharmaceuticals Inc	VRTX	254.457	427.38	108,749.82	0.22%			11.19%	0.02%
Vistra Corp	VST	338.549	157.84	53,436.62		0.58%		32.00%	
Ventas Inc	VTR	486.170	87.86	42,714.87	0.09%	2.37%	0.00%	16.78%	0.01%
Viatis Inc	VTRS	1164.421	14.94	17,396.45	0.03%	3.21%	0.00%	3.33%	0.00%
Verizon Communications Inc	VZ	4176.000	48.03	200,573.28	0.40%	5.89%	0.02%	4.85%	0.02%
Westinghouse Air Brake Technologies Corp	WAB	169.677	269.89	45,794.22	0.09%	0.46%	0.00%	14.09%	0.01%
Waters Corp	WAT	98.165	309.23	30,355.71	0.06%			9.10%	0.01%
Warner Bros Discovery Inc	WBD	2506.679	27.05	67,805.68					
Workday Inc	WDAY	210.000	122.4	25,704.00					
Western Digital Corp	WDC	339.038	434.52	147,318.76		0.14%		55.92%	
WEC Energy Group Inc	WEC	325.700	117.94	38,413.01	0.08%	3.23%	0.00%	7.08%	0.01%
Welltower Inc	WELL	705.914	217.34	153,423.45		1.36%		22.52%	
Wells Fargo & Co	WFC	3060.189	82.23	251,639.38	0.50%	2.19%	0.01%	10.21%	0.05%
Waste Management Inc	WM	401.576	232.55	93,386.44	0.19%	1.63%	0.00%	9.01%	0.02%
Williams Cos Inc/The	WMB	1222.857	76.31	93,316.21	0.19%	2.75%	0.01%	16.89%	0.03%
Walmart Inc	WMT	7970.991	131.93	1,051,612.78	2.11%	0.75%	0.02%	9.89%	0.21%
W R Berkley Corp	WRB	390.019	66.83	26,064.97	0.05%	0.54%	0.00%	8.02%	0.00%
Williams-Sonoma Inc	WSM	119.016	181.21	21,566.90	0.04%	1.68%	0.00%	6.12%	0.00%
West Pharmaceutical Services Inc	WST	70.648	297.59	21,024.02	0.04%	0.30%	0.00%	9.41%	0.00%
Willis Towers Watson PLC	WTW	94.448	256.2	24,197.57	0.05%	1.50%	0.00%	13.57%	0.01%
Weyerhaeuser Co	WY	721.043	24.52	17,679.96	0.04%	3.43%	0.00%	17.11%	0.01%
Wynn Resorts Ltd	WYNN	104.043	107.11	11,144.09		0.93%		27.00%	
Xcel Energy Inc	XEL	624.270	82.95	51,783.16	0.10%	2.86%	0.00%	8.68%	0.01%
Exxon Mobil Corp	XOM	4156.559	154.33	641,481.82	1.28%	2.67%	0.03%	9.19%	0.12%
Xylem Inc/NY	XYL	237.693	118.16	28,085.86	0.06%	1.46%	0.00%	8.50%	0.00%
Block Inc	XYZ	535.370	70.51	37,748.97					
Yum! Brands Inc	YUM	276.173	159.65	44,091.06	0.09%	1.88%	0.00%	9.73%	0.01%
Zimmer Biomet Holdings Inc	ZBH	193.569	82.43	15,955.90	0.03%	1.16%	0.00%	5.64%	0.00%
Zebra Technologies Corp	ZBRA	48.363	226.26	10,942.52	0.02%			7.00%	0.00%
Zoetis Inc	ZTS	420.640	114.97	48,360.98	0.10%	1.84%	0.00%	7.89%	0.01%

## Notes:

[1] Equals sum of Col. [9]

[2] Equals sum of Col. [11]

[3] Equals ((1) x (1 + (0.5 x [2]))) + [2]

[4] Bloomberg Professional as of April 30, 2026

[5] Bloomberg Professional as of April 30, 2026

[6] Equals [4] x [5]

[7] Equals weight in S&amp;P 500 based on market capitalization [6] if Growth Rate &gt;0% and ≤20%

[8] Bloomberg Professional, as of April 30, 2026

[9] Equals [7] x [8]

[10] Average of Bloomberg Professional and Value Line, as of April 30, 2026

[11] Equals [7] x [10]

## PROJECTED CAPITAL EXPENDITURES AS A PERCENT OF NET PLANT

(\$ Millions)

		[1]	[2]	[3]	[4]	[5]	[6]	[7]
		2025	2026	2027	2028	2029	2030	2031
								2026-2031 Projected Cap. Ex. / 2025 Net Plant
Atmos Energy Corporation	ATO							
Capital Spending per Share			\$24.55	\$23.75	\$21.93	\$20.10	\$20.10	\$20.10
Common Shares Outstanding			171.00	180.00	190.00	200.00	200.00	200.00
Capital Expenditures			\$4,198.1	\$4,275.0	\$4,165.8	\$4,020.0	\$4,020.0	
Net Plant		\$25,293.0						81.8%
Chesapeake Utilities Corporation	CPK							
Capital Spending per Share			\$18.75	\$19.15	\$18.70	\$18.25	\$18.25	\$18.25
Common Shares Outstanding			24.00	24.00	24.00	24.00	24.00	24.00
Capital Expenditures			\$450.0	\$459.6	\$448.8	\$438.0	\$438.0	
Net Plant		\$3,100.0						72.1%
NiSource Inc.	NI							
Capital Spending per Share			\$6.00	\$6.00	\$6.13	\$6.25	\$6.25	\$6.25
Common Shares Outstanding			500.00	510.00	517.50	525.00	525.00	525.00
Capital Expenditures			\$3,000.0	\$3,060.0	\$3,169.7	\$3,281.3	\$3,281.3	
Net Plant		\$28,688.0						55.0%
Northwest Natural Gas Company	NWN							
Capital Spending per Share			\$9.80	\$10.00	\$10.15	\$10.30	\$10.30	\$10.30
Common Shares Outstanding			45.00	46.00	48.00	50.00	50.00	50.00
Capital Expenditures			\$441.0	\$460.0	\$487.2	\$515.0	\$515.0	
Net Plant		\$3,985.0						60.7%
ONE Gas, Inc.	OGS							
Capital Spending per Share			\$11.95	\$11.75	\$11.38	\$11.00	\$11.00	\$11.00
Common Shares Outstanding			62.00	64.00	69.50	75.00	75.00	75.00
Capital Expenditures			\$740.9	\$752.0	\$790.6	\$825.0	\$825.0	
Net Plant		\$7,200.0						54.6%
Southwest Gas Corporation	SWX							
Capital Spending per Share			\$10.25	\$10.15	\$10.03	\$9.90	\$9.90	\$9.90
Common Shares Outstanding			74.00	75.00	76.00	77.00	77.00	77.00
Capital Expenditures			\$758.5	\$761.3	\$761.9	\$762.3	\$762.3	
Net Plant		\$8,600.0						44.3%
American States Water Company	AWR							
Capital Spending per Share			\$6.20	\$6.35	\$6.43	\$6.50	\$6.50	\$6.50
Common Shares Outstanding			39.25	39.50	39.75	40.00	40.00	40.00
Capital Expenditures			\$243.4	\$250.8	\$255.4	\$260.0	\$260.0	\$260.0
Net Plant		\$2,296.3						66.6%
California Water Service Group	CWT							
Capital Spending per Share			\$10.75	\$13.65	\$12.83	\$12.00	\$12.00	\$12.00
Common Shares Outstanding			60.00	60.00	60.00	60.00	60.00	60.00
Capital Expenditures			\$645.0	\$819.0	\$769.5	\$720.0	\$720.0	\$720.0
Net Plant		\$4,579.6						95.9%
Middlesex Water Company	MSEX							
Capital Spending per Share			\$5.45	\$5.65	\$5.83	\$6.00	\$6.00	\$6.00
Common Shares Outstanding			18.50	18.65	18.70	18.75	18.75	18.75
Capital Expenditures			\$100.8	\$105.4	\$108.9	\$112.5	\$112.5	\$112.5
Net Plant		\$1,161.5						56.2%
H2O America (SJW Group)	HTO							
Capital Spending per Share			\$10.50	\$9.75	\$9.25	\$8.75	\$8.75	\$8.75
Common Shares Outstanding			42.00	40.00	37.50	35.00	35.00	35.00
Capital Expenditures			\$441.0	\$390.0	\$346.9	\$306.3	\$306.3	\$306.3
Net Plant		\$3,923.3						53.4%
Missouri American Water	MAWC							
Capital Expenditures [8]			\$553.75	\$654.66	\$584.03	\$573.88	\$519.42	\$630.91
Net Plant [9]		\$4,425.0						79.5%

MAWC CapEx Total (2026-2031)	\$3,516.65
MAWC CapEx Annual Average	\$577.15
Proxy Group Median	58.44%
MAWC as % Proxy Group Median	1.36

## Notes:

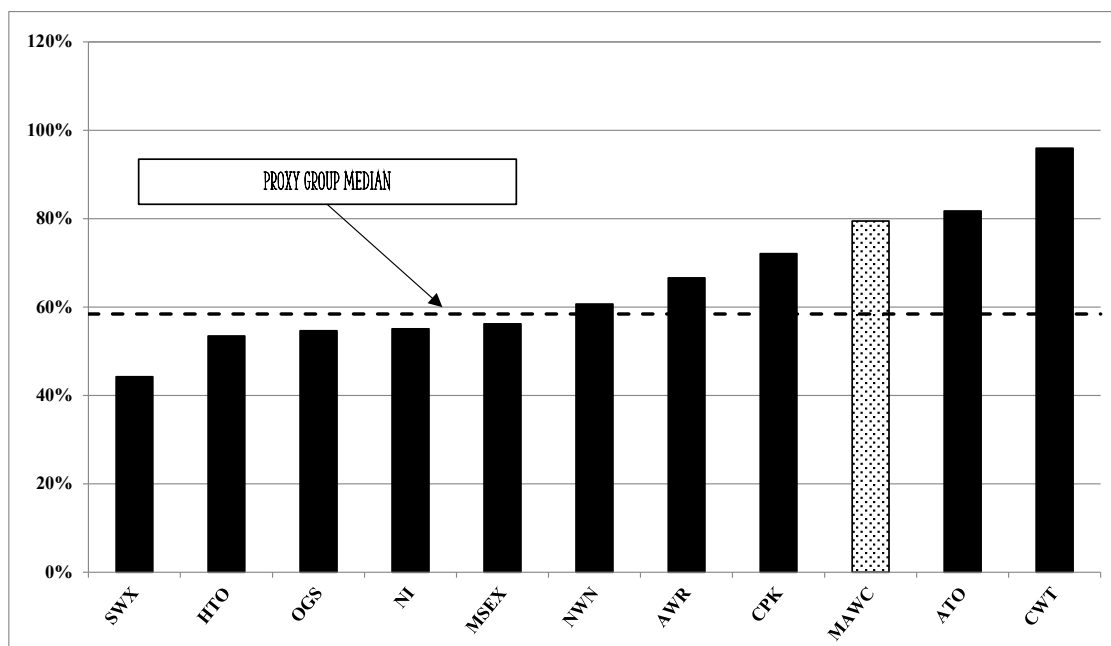
[1] - [6] Value Line, dated February 20, 2026 and April 3, 2026

[7] Equals (Column [2] + [3] + [4] + [5] + [6]) / Column [1]

[8] Company Provided Data

[9] Company provided data

**PROJECTED CAPITAL EXPENDITURES AS A PERCENT OF NET PLANT**



**Projected CAPEX / Net Plant**

Rank	Company	Percent	
1	Southwest Gas Corporation	SWX	44.26%
2	H2O America (SJW Group)	HTO	53.44%
3	ONE Gas, Inc.	OGS	54.63%
4	NiSource Inc.	NI	55.05%
5	Middlesex Water Company	MSEX	56.19%
6	Northwest Natural Gas Company	NWN	60.68%
7	American States Water Company	AWR	66.61%
8	Chesapeake Utilities Corporation	CPK	72.08%
9	Missouri American Water	MAWC	79.47%
10	Atmos Energy Corporation	ATO	81.76%
11	California Water Service Group	CWT	95.94%
Proxy Group Median		58.44%	
MAWC as % of Median		136.00%	

Notes:

Exhibit AEB-7, pp. 1 col. [7]

**COMPARISON OF  
COST RECOVERY MECHANISMS**

Company	Ticker	State	Utility Type	Infrastructure Cost Recovery Mechanism	Future Test Year	Revenue Stabilization or Decoupling			
American States Water Co	AWR	California	Water	No	Fully Forecast	Full			
	AWR	California	Electric	No	Fully Forecast	Full			
Atmos Energy Corporation	ATO	Colorado	Gas	Yes	Historical	No			
	ATO	Kansas	Gas	Yes	Historical	Partial			
	ATO	Kentucky	Gas	Yes	Fully Forecast	Partial			
	ATO	Louisiana	Gas	Yes	Historical	FRP			
	ATO	Mississippi	Gas	Yes	Historical	FRP			
	ATO	Tennessee	Gas	Yes	Historical	FRP			
	ATO	Texas	Gas	Yes	Historical	FRP			
	ATO	Virginia	Gas	Yes	Historical	Partial			
Chesapeake Utilities Corporation	CPK	Delaware	Gas	Yes	Historical	No			
	CPK	Maryland	Gas	No	Partially Forecast	Partial			
	CPK	Florida	Electric	Yes	Fully Forecast	No			
	CPK	Florida	Gas	Yes	Fully Forecast	No			
California Water Service Group	CWT	California	Water	Yes	Fully Forecast	Full			
	CWT	Hawaii	Water	No	Fully Forecast	No			
	CWT	New Mexico	Water	No	Fully Forecast	No			
	CWT	Washington	Water	Yes	Historical	No			
Middlesex Water Company	MSEX	New Jersey	Water	Yes	Partially Forecast	No			
	MSEX	Delaware	Water	Yes	Historical	No			
	MSEX	Pennsylvania	Water	No	Fully Forecast	No			
NiSource Inc.	NI	Indiana	Electric	Yes	Fully Forecast	Partial			
	NI	Indiana	Gas	Yes	Fully Forecast	Partial			
	NI	Kentucky	Gas	Yes	Fully Forecast	Partial			
	NI	Maryland	Gas	Yes	Partially Forecast	Partial			
	NI	Ohio	Gas	Yes	Partially Forecast	SFV			
	NI	Pennsylvania	Gas	Yes	Fully Forecast	Partial			
	NI	Virginia	Gas	Yes	Fully Forecast	Partial			
Northwest Natural Gas Company	NWN	Oregon	Gas	Yes	Fully Forecast	Partial			
	NWN	Washington	Gas	No	Historical	No			
ONE Gas, Inc.	OGS	Kansas	Gas	Yes	Historical	Partial			
	OGS	Oklahoma	Gas	No	Historical	FRP			
	OGS	Texas	Gas	Yes	Historical	FRP			
H2O America (SJW Group)	H2O	California	Water	Yes	Fully Forecast	Full			
	H2O	Connecticut	Water	Yes	Fully Forecast	Full			
	H2O	Maine	Water	Yes	Historical	No			
	H2O	Texas	Water	No	Historical	No			
Southwest Gas Corporation	SWX	Arizona	Gas	Yes	Historical	Full			
	SWX	California	Gas	No	Fully Forecast	Full			
	SWX	Nevada	Gas	Yes	Historical	Full			
Proxy Group Totals				Yes	30	Historical	18	Full	8
				No	10	Fully Forecast	18	Partial	12
						Partially Forecast	4	FRP	6
								SFV	1
								No	13
				Yes	75.00%	Future Test Year	55.00%	RSM	67.50%
Missouri American Water		Missouri	Water	Historical		Fully Forecast		No	

**COMPARISON OF  
RRA JURISDICTIONAL RANKINGS**

Ultimate Parent Company	Jurisdiction	[1]	[2]
		RRA	
		Rank	Numeric Rank
American States Water Company	California	Average / 1	4
Atmos Energy Corporation	Colorado	Average / 1	4
	Kansas	Average / 3	6
	Kentucky	Average / 2	5
	Louisiana — PSC	Average / 2	5
	Mississippi	Above Average / 3	3
	Tennessee	Above Average / 3	3
	Texas — RRC	Average / 1	4
	Virginia	Average / 1	4
Chesapeake Utilities Corporation	Delaware	Average / 2	5
	Maryland	Below Average / 3	9
	Florida	Above Average / 2	2
California Water Service Group	California	Average / 1	4
	Hawaii	Average / 2	5
	New Mexico	Below Average / 1	7
	Washington	Average / 3	6
Middlesex Water Company	Delaware	Average / 2	5
	New Jersey	Average / 3	6
	Pennsylvania	Above Average / 2	2
NiSource Inc.	Indiana	Average / 1	4
	Kentucky	Average / 2	5
	Maryland	Below Average / 3	9
	Ohio	Average / 1	4
	Pennsylvania	Above Average / 2	2
	Virginia	Average / 1	4
Northwest Natural Gas Company	Oregon	Average / 3	6
	Washington	Average / 3	6
ONE Gas, Inc.	Kansas	Average / 3	6
	Oklahoma	Average / 3	6
	Texas — RRC	Average / 1	4
H2O America (SJW Group)	California	Average / 1	4
	Connecticut	Below Average / 3	9
	Maine	Average / 3	6
	Texas — PUC	Below Average / 1	7
Southwest Gas Corporation	Arizona	Below Average / 1	7
	California	Average / 1	4
	Nevada	Average / 1	4
Proxy Group Average		Average 2 - Average / 3	5.03
MAWC	Missouri	Average / 2	5

Notes

[1] State Regulatory Evaluations, Regulatory Research Associates, May 20, 2026

[2] AA/1= 1, AA/2= 2, AA/3= 3, A/1= 4, A/2= 5, A/3=6, BA/1= 7, BA/2= 8, BA/3= 9

**COMPARISON OF  
S&P JURISDICTIONAL RANKINGS**

Ultimate Parent Company	Jurisdiction	[1]	[2]
		S&P	
		Rank	Numeric Rank
American States Water Company	California	More credit supportive	4
Atmos Energy Corporation	Colorado	Very credit supportive	3
	Kansas	Highly credit supportive	2
	Kentucky	Most credit supportive	1
	Louisiana — PSC	Highly credit supportive	2
	Mississippi	Highly credit supportive	2
	Tennessee	Highly credit supportive	2
	Texas — RRC	Highly credit supportive	2
	Virginia	Highly credit supportive	2
Chesapeake Utilities Corporation	Delaware	Very credit supportive	3
	Maryland	Very credit supportive	3
	Florida	Most credit supportive	1
California Water Service Group	California	More credit supportive	4
	Hawaii	More credit supportive	4
	New Mexico	Credit Supportive	5
	Washington	Very credit supportive	3
Middlesex Water Company	Delaware	Very credit supportive	3
	New Jersey	More credit supportive	4
	Pennsylvania	Highly credit supportive	2
NiSource Inc.	Indiana	Highly credit supportive	2
	Kentucky	Most credit supportive	1
	Maryland	Very credit supportive	3
	Ohio	Very credit supportive	3
	Pennsylvania	Highly credit supportive	2
	Virginia	Highly credit supportive	2
Northwest Natural Gas Company	Oregon	More credit supportive	4
	Washington	Very credit supportive	3
ONE Gas, Inc.	Kansas	Highly credit supportive	2
	Oklahoma	Very credit supportive	3
	Texas — RRC	Highly credit supportive	2
H2O America (SJW Group)	California	More credit supportive	4
	Connecticut	Credit Supportive	5
	Maine	Highly credit supportive	2
	Texas — PUC	Very credit supportive	3
Southwest Gas Corporation	Arizona	Very credit supportive	3
	California	More credit supportive	4
	Nevada	Very credit supportive	3
Proxy Group Average		Highly credit supportive - Very credit supportive	2.78
MAWC	Missouri	Highly credit supportive	2

Notes

[1] Source: North American Utilities Regulatory Jurisdictions Update: Notable Developments, May 7, 2026

[2] Most Credit Supp. = 1, Highly Credit Supp. = 2, Very Credit Supp. = 3, More Credit Supp. = 4, Credit Supp. = 5

## FLOTATION COST ADJUSTMENT

			[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]
Company	Ticker	Date [1]	Shares Issued (000)	Offering Price	Under-writing Discount [ii]	Offering Expense (\$000)	Net Proceeds Per Share	Total Flotation Costs (\$000) (\$000)	Gross Equity Issue Before Costs (\$000)	Net Proceeds (\$000)	Flotation Cost Percentage
American Water Works Company	AWK	2/28/2023	12,650	\$ 135.50	\$ 2.033	\$ 700	\$ 133.41	\$ 26,411	\$ 1,714,075	\$ 1,687,664	1.54% [iii]
American Water Works Company	AWK	8/4/2025	7,042	\$ 142.00	\$ 2.343	\$ 800	\$ 139.54	\$ 17,299	\$ 999,964	\$ 982,665	1.73% [iv]
<i>Weighted Average Flotation Costs</i>								\$ 43,711	\$ 2,714,039	\$ 2,670,328	1.61%

[i] Offering Completion Date

[ii] Underwriting discount is calculated as the market price minus the offering price when not explicitly given in the prospectus

[iii] American Water Works Company: AWK Prospectus 424B7 02.28.2023

[iv] American Water Works Company: Prospectus 424(b)2 08.04.2025

The flotation cost adjustment is derived by dividing the dividend yield by  $1 - F$  (where  $F$  = flotation costs expressed in percentage terms), or by 0.9846, and adding that result to the constant growth rate to determine the cost of equity. Using the formulas shown previously in my testimony, the Constant Growth DCF calculation is modified as follows to accommodate an adjustment for flotation costs:

$$k = \frac{D \times (1 + 0.5g)}{P \times (1 - F)} + g$$

		[10]	[11]	[12]	[13]	[14]	[15]	[16]	[17]	[18]	[19]	[20]
Company	Ticker	Annualized Dividend	Stock Price	Dividend Yield	Expected Dividend Yield	Expected Dividend Yield Adjusted for Flotation Costs	Value Line Earnings Growth	S&P Capital IQ Earnings Growth	Zacks Earnings Growth	Average Earnings Growth	Cost of Equity: Mean Growth Rate	Cost of Equity Adjusted for Flotation Costs
Atmos Energy Corporation	ATO	\$4.00	\$185.97	2.15%	2.23%	2.27%	8.00%	8.02%	6.80%	7.61%	9.84%	9.88%
Chesapeake Utilities Corporation	CPK	\$2.74	\$127.15	2.15%	2.24%	2.28%	8.00%	8.30%	n/a	8.15%	10.39%	10.43%
NiSource Inc.	NI	\$1.20	\$46.91	2.56%	2.66%	2.70%	7.50%	9.10%	6.10%	7.57%	10.22%	10.27%
Northwest Natural Gas Company	NWN	\$1.97	\$53.12	3.71%	3.82%	3.89%	6.00%	6.50%	n/a	6.25%	10.07%	10.14%
ONE Gas, Inc.	OGS	\$2.72	\$87.64	3.10%	3.20%	3.25%	6.00%	6.23%	6.20%	6.14%	9.34%	9.39%
Southwest Gas Corporation	SWX	\$2.48	\$89.29	2.78%	2.93%	2.97%	n/a	12.21%	9.20%	10.71%	13.63%	13.68%
American States Water Company	AWR	\$2.02	\$76.54	2.63%	2.73%	2.77%	7.00%	6.93%	n/a	6.96%	9.69%	9.73%
California Water Service Group	CWT	\$1.34	\$45.47	2.95%	3.10%	3.15%	9.50%	10.62%	n/a	10.06%	13.15%	13.20%
Middlesex Water Company	MSEX	\$1.44	\$52.47	2.74%	2.88%	2.93%	8.00%	11.70%	n/a	9.85%	12.73%	12.78%
H2O America (SJW Group)	HTO	\$1.76	\$58.47	3.01%	3.09%	3.14%	5.00%	5.60%	5.60%	5.42%	8.51%	8.56%
Median											10.15%	10.20%
Flotation Cost Adjustment												0.05% [21]

## Notes:

[1] - [4] See Notes [1] to [iv] above

[5] Equals [8]/[1]

[6] Equals [4] + ([1] x [3])

[7] Equals [1] x [2]

[8] Equals [7] - [6]

[9] Equals [6] / [7]

[10] Bloomberg Professional

[11] Bloomberg Professional, equals 30-day average as of April 30, 2026

[12] Equals [10] / [11]

[13] Equals [12] x (1 + 0.5 x [18])

[14] Equals [13] / (1 - Flotation Cost)

[15] Value Line

[16] S&P Capital IQ

[17] Zacks Investment Research

[18] Equals Average of [15], [16], [17]

[19] Equals [13] + [18]

[20] Equals [14] + [18]

[21] Equals [20] (Median) - [19] (Median)

[22] S&P Capital IQ and Zacks report an equivalent projected EPS growth rate for AWR and CWT. To avoid doubling counting, I exclude the projected EPS growth rate from Zacks for AWR and CWT.

## CAPITAL STRUCTURE ANALYSIS

Proxy Group Company	Ticker	COMMON EQUITY RATIO [1]			
		2024	2023	2022	3-yr Avg.
American States Water Company	AWR	56.95%	56.39%	60.78%	58.04%
Atmos Energy Corporation	ATO	60.26%	60.20%	60.01%	60.16%
California Water Service Group	CWT	55.89%	58.51%	59.85%	58.08%
Chesapeake Utilities Corporation	CPK	51.92%	50.83%	58.13%	53.63%
Middlesex Water Company	MSEX	47.43%	45.63%	87.05%	60.04%
NiSource Inc.	NI	52.10%	52.76%	52.56%	52.47%
Northwest Natural Gas Company	NWN	49.60%	47.26%	51.21%	49.36%
ONE Gas, Inc.	OGS	72.92%	73.63%	58.25%	68.27%
H2O America	HTO	54.34%	56.37%	53.99%	54.90%
Southwest Gas Corporation	SWX	48.13%	47.45%	43.96%	46.51%
<b>Proxy Group</b>					
MEAN		54.96%	54.90%	58.58%	56.15%
LOW		47.43%	45.63%	43.96%	46.51%
HIGH		72.92%	73.63%	87.05%	68.27%

COMMON EQUITY RATIO - UTILITY OPERATING COMPANIES					
Company Name	Ticker	2024	2023	2022	3-yr Avg.
Golden State Water / Bear Valley	AWR	56.95%	56.39%	60.78%	58.04%
Atmos Energy Corporation	ATO	60.26%	60.20%	60.01%	60.16%
California Water Service	CWT	53.09%	52.84%	50.33%	52.09%
New Mexico Water Service Water Division	CWT	60.66%	61.20%	65.50%	62.45%
New Mexico Water Service Sewer Division	CWT	58.78%	63.22%	64.71%	62.23%
Washington Water Service	CWT	51.24%	57.31%	62.87%	57.14%
Hawaii Water Service Kaanapali Division	CWT	42.70%	49.38%	49.85%	47.31%
Hawaii Water Service Pukalani Division	CWT	68.89%	67.08%	65.87%	67.28%
Chesapeake Utilities Corporation	CPK	51.92%	50.83%	58.13%	53.63%
Middlesex Water Company	MSEX	61.71%	60.13%	61.15%	61.00%
Pinelands Water	MSEX	39.02%	36.86%	100.00%	58.63%
Pinelands WW	MSEX	41.56%	39.89%	100.00%	60.48%
Northern Indiana Public Service Company LLC	NI	58.24%	59.26%	56.92%	58.14%
Columbia Gas of Kentucky, Inc.	NI	51.44%	53.66%	54.91%	53.34%
Columbia Gas of Maryland, Inc.	NI	52.00%	52.00%	51.96%	51.99%
Columbia Gas of Ohio, Inc.	NI	50.27%	50.50%	50.67%	50.48%
Columbia Gas of Pennsylvania, Inc.	NI	56.07%	55.88%	56.64%	56.20%
Columbia Gas of Virginia, Inc.	NI	44.58%	45.25%	44.25%	44.69%
Northwest Natural Gas Company	NWN	49.60%	47.26%	51.21%	49.36%
Kansas Gas Service Company, Inc.	OGS	59.53%	60.44%	58.37%	59.45%
Oklahoma Natural Gas Company	OGS	59.23%	60.46%	58.26%	59.32%
Texas Gas Service Company, Inc.	OGS	100.00%	100.00%	58.13%	86.04%
San Jose Water	HTO	50.12%	52.16%	53.20%	51.83%
CT Water	HTO	54.56%	57.23%	54.61%	55.47%
Maine Water Co.	HTO	58.33%	59.72%	54.16%	57.40%
Southwest Gas Corporation	SWX	48.13%	47.45%	43.96%	46.51%

Notes:

[1] Ratios are weighted by actual common capital, preferred equity, and long-term debt of Operating Subsidiaries.

[2] Natural Gas, Electric and Water operating subsidiaries where data was unable to be obtained for 2024, 2023, and 2022 were removed from the analysis.

## CAPITAL STRUCTURE ANALYSIS

Proxy Group Company	Ticker	LONG-TERM DEBT RATIO [1]			
		2024	2023	2022	3-yr Avg.
American States Water Company	AWR	43.05%	43.61%	39.22%	41.96%
Atmos Energy Corporation	ATO	39.74%	39.80%	39.99%	39.84%
California Water Service Group	CWT	44.11%	41.49%	40.15%	41.92%
Chesapeake Utilities Corporation	CPK	48.08%	49.17%	41.87%	46.37%
Middlesex Water Company	MSEX	52.49%	54.28%	12.84%	39.87%
NiSource Inc.	NI	47.90%	47.24%	47.44%	47.53%
Northwest Natural Gas Company	NWN	50.40%	52.74%	48.79%	50.64%
ONE Gas, Inc.	OGS	27.08%	26.37%	41.75%	31.73%
H2O America	HTO	45.66%	43.63%	46.01%	45.10%
Southwest Gas Corporation	SWX	51.87%	52.55%	56.04%	53.49%
<b>Proxy Group</b>					
MEAN		45.04%	45.09%	41.41%	43.84%
LOW		27.08%	26.37%	12.84%	31.73%
HIGH		52.49%	54.28%	56.04%	53.49%

## LONG-TERM DEBT RATIO - UTILITY OPERATING COMPANIES

Company Name	Ticker	2024	2023	2022	3-yr Avg.
Golden State Water / Bear Valley	AWR	43.05%	43.61%	39.22%	41.96%
Atmos Energy Corporation	ATO	39.74%	39.80%	39.99%	39.84%
California Water Service	CWT	46.91%	47.16%	49.67%	47.91%
New Mexico Water Service Water Division	CWT	39.34%	38.80%	34.50%	37.55%
New Mexico Water Service Sewer Division	CWT	41.22%	36.78%	35.29%	37.77%
Washington Water Service	CWT	48.76%	42.69%	37.13%	42.86%
Hawaii Water Service Kaanapali Division	CWT	57.30%	50.62%	50.15%	52.69%
Hawaii Water Service Pukalani Division	CWT	31.11%	32.92%	34.13%	32.72%
Chesapeake Utilities Corporation	CPK	48.08%	49.17%	41.87%	46.37%
Middlesex Water Company	MSEX	38.06%	39.57%	38.53%	38.72%
Pinelands Water	MSEX	60.98%	63.14%	0.00%	41.37%
Pinelands WW	MSEX	58.44%	60.11%	0.00%	39.52%
Northern Indiana Public Service Company LLC	NI	41.76%	40.74%	43.08%	41.86%
Columbia Gas of Kentucky, Inc.	NI	48.56%	46.34%	45.09%	46.66%
Columbia Gas of Maryland, Inc.	NI	48.00%	48.00%	48.04%	48.01%
Columbia Gas of Ohio, Inc.	NI	49.73%	49.50%	49.33%	49.52%
Columbia Gas of Pennsylvania, Inc.	NI	43.93%	44.12%	43.36%	43.80%
Columbia Gas of Virginia, Inc.	NI	55.42%	54.75%	55.75%	55.31%
Northwest Natural Gas Company	NWN	50.40%	52.74%	48.79%	50.64%
Kansas Gas Service Company, Inc.	OGS	40.47%	39.56%	41.63%	40.55%
Oklahoma Natural Gas Company	OGS	40.77%	39.54%	41.74%	40.68%
Texas Gas Service Company, Inc.	OGS	0.00%	0.00%	41.87%	13.96%
San Jose Water	HTO	49.88%	47.84%	46.80%	48.17%
CT Water	HTO	45.44%	42.77%	45.39%	44.53%
Maine Water Co.	HTO	41.67%	40.28%	45.84%	42.60%
Southwest Gas Corporation	SWX	51.87%	52.55%	56.04%	53.49%

Notes:

[1] Ratios are weighted by actual common capital, preferred equity, and long-term debt of Operating Subsidiaries.

[2] Natural Gas, Electric and Water operating subsidiaries where data was unable to be obtained for 2024, 2023, and 2022 were removed from the analysis.

## CAPITAL STRUCTURE ANALYSIS

Proxy Group Company	Ticker	PREFERRED EQUITY RATIO [1]			
		2024	2023	2022	3-yr Avg.
American States Water Company	AWR	0.00%	0.00%	0.00%	0.00%
Atmos Energy Corporation	ATO	0.00%	0.00%	0.00%	0.00%
California Water Service Group	CWT	0.00%	0.00%	0.00%	0.00%
Chesapeake Utilities Corporation	CPK	0.00%	0.00%	0.00%	0.00%
Middlesex Water Company	MSEX	0.08%	0.10%	0.11%	0.09%
NiSource Inc.	NI	0.00%	0.00%	0.00%	0.00%
Northwest Natural Gas Company	NWN	0.00%	0.00%	0.00%	0.00%
ONE Gas, Inc.	OGS	0.00%	0.00%	0.00%	0.00%
H2O America	HTO	0.00%	0.00%	0.00%	0.00%
Southwest Gas Corporation	SWX	0.00%	0.00%	0.00%	0.00%
<b>Proxy Group</b>					
MEAN		0.01%	0.01%	0.01%	0.01%
LOW		0.00%	0.00%	0.00%	0.00%
HIGH		0.08%	0.10%	0.11%	0.09%

Company Name	Ticker	PREFERRED EQUITY RATIO - UTILITY OPERATING COMPANIES			
		2024	2023	2022	3-yr Avg.
Golden State Water / Bear Valley	AWR	0.00%	0.00%	0.00%	0.00%
Atmos Energy Corporation	ATO	0.00%	0.00%	0.00%	0.00%
California Water Service	CWT	0.00%	0.00%	0.00%	0.00%
New Mexico Water Service Water Division	CWT	0.00%	0.00%	0.00%	0.00%
New Mexico Water Service Sewer Division	CWT	0.00%	0.00%	0.00%	0.00%
Washington Water Service	CWT	0.00%	0.00%	0.00%	0.00%
Hawaii Water Service Kaanapali Division	CWT	0.00%	0.00%	0.00%	0.00%
Hawaii Water Service Pukalani Division	CWT	0.00%	0.00%	0.00%	0.00%
Chesapeake Utilities Corporation	CPK	0.00%	0.00%	0.00%	0.00%
Middlesex Water Company	MSEX	0.23%	0.30%	0.32%	0.28%
Pinelands Water	MSEX	0.00%	0.00%	0.00%	0.00%
Pinelands WW	MSEX	0.00%	0.00%	0.00%	0.00%
Northern Indiana Public Service Company LLC	NI	0.00%	0.00%	0.00%	0.00%
Columbia Gas of Kentucky, Inc.	NI	0.00%	0.00%	0.00%	0.00%
Columbia Gas of Maryland, Inc.	NI	0.00%	0.00%	0.00%	0.00%
Columbia Gas of Ohio, Inc.	NI	0.00%	0.00%	0.00%	0.00%
Columbia Gas of Pennsylvania, Inc.	NI	0.00%	0.00%	0.00%	0.00%
Columbia Gas of Virginia, Inc.	NI	0.00%	0.00%	0.00%	0.00%
Northwest Natural Gas Company	NWN	0.00%	0.00%	0.00%	0.00%
Kansas Gas Service Company, Inc.	OGS	0.00%	0.00%	0.00%	0.00%
Oklahoma Natural Gas Company	OGS	0.00%	0.00%	0.00%	0.00%
Texas Gas Service Company, Inc.	OGS	0.00%	0.00%	0.00%	0.00%
San Jose Water	HTO	0.00%	0.00%	0.00%	0.00%
CT Water	HTO	0.00%	0.00%	0.00%	0.00%
Maine Water Co.	HTO	0.00%	0.00%	0.00%	0.00%
Southwest Gas Corporation	SWX	0.00%	0.00%	0.00%	0.00%

Notes:

[1] Ratios are weighted by actual common capital, preferred equity, and long-term debt of Operating Subsidiaries.

[2] Natural Gas, Electric and Water operating subsidiaries where data was unable to be obtained for 2024, 2023, and 2022 were removed from the analysis.