

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
Duke Energy Ohio, Inc., for an)	Case No. 12-1682-EL-AIR
Increase in Electric Distribution Rates.)	
 In the Matter of the Application of)	
Duke Energy Ohio, Inc., for Tariff)	Case No. 12-1683-EL-ATA
Approval.)	
 In the Matter of the Application of)	
Duke Energy Ohio, Inc., for Approval)	Case No. 12-1684-EL-AAM
to Change Accounting Methods.)	

SUPPLEMENTAL DIRECT TESTIMONY OF

ROGER A. MORIN, Ph.D.

ON BEHALF OF

DUKE ENERGY OHIO, INC.

_____	Management policies, practices, and organization
_____	Operating income
_____	Rate Base
_____	Allocation
<u> X </u>	Rate of return
_____	Rates and tariffs
_____	Other:

February 19, 2013

TABLE OF CONTENTS

	<u>PAGE</u>
I. INTRODUCTION AND SUMMARY	1
II. COMPARABLE GROUP	5
III. DCF ANALYSIS	6
IV. CAPM ESTIMATES	7
V. CAPM RISK-FREE RATE.....	7
VI. CAPM'S EMPIRICAL VALIDITY.....	15
VII. FLOTATION COST ALLOWANCE.....	16
VIII. CONCLUSIONS	17

I. INTRODUCTION AND SUMMARY

1 **Q. PLEASE STATE YOUR NAME, ADDRESS, AND OCCUPATION.**

2 A. My name is Mr. Roger A. Morin. My business address is Georgia State
3 University, Robinson College of Business, University Plaza, Atlanta, Georgia,
4 30303. I am Emeritus Professor of Finance at the College of Business, Georgia
5 State University and Professor of Finance for Regulated Industry at the Center for
6 the Study of Regulated Industry at Georgia State University. I am also a principal
7 in Utility Research International, an enterprise engaged in regulatory finance and
8 economics consulting to business and government.

9 **Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING ON**
10 **BEHALF OF DUKE ENERGY OF OHIO, INC. (DUKE ENERGY OHIO**
11 **OR COMPANY)?**

12 A. Yes, I did.

13 **Q. WHAT IS THE PURPOSE OF THIS SUPPLEMENTAL DIRECT**
14 **TESTIMONY?**

15 A. I have been asked to respond to the rate of return on common equity (ROE)
16 recommendation of the Staff of the Public Utilities Commission of Ohio (Staff) in
17 this proceeding.

18 **Q. PLEASE SUMMARIZE STAFF'S RECOMMENDED ROE.**

19 A. Staff recommends a ROE for Duke Energy Ohio in the range of 8.82% to 9.84%.
20 Staff relies on a three-stage Discounted Cash Flow (DCF) analysis applied to a
21 group of five utilities. As summarized on page 18 of its report, the DCF analysis
22 produced an average ROE of 10.24%.

1 Staff also applies a Capital Asset Pricing Model (CAPM) analysis to the
2 same group of companies. As summarized on page 18 of its report, the average
3 CAPM result for the group was only 5.9%, which is barely above the Company's
4 cost of debt. This latter result is clearly an outlier and either should be ignored
5 entirely or relies on erroneous input data.

6 Based on these results, and giving 75% weight to the DCF result of
7 10.24% and 25% weight to the CAPM result of 5.9%, Staff concludes that the
8 cost of common equity for Duke Energy Ohio is 9.6%. Using a 100 basis points
9 range of uncertainty, the cost of common equity lies in a range of 8.66% to
10 9.66%. Allowance for flotation costs brings Staff's final recommended range to
11 8.82% - 9.84%.

12 **Q. DO YOU AGREE WITH STAFF'S RECOMMENDED CAPITAL**
13 **STRUCTURE?**

14 A. Yes, I do.

15 **Q. WHAT ARE YOUR GENERAL REACTIONS TO STAFF'S ROE**
16 **RECOMMENDATION?**

17 A. My first reaction is that there are numerous areas of agreement between Staff and
18 myself. My second general reaction is that the ROE recommended by Staff: 1)
19 lies outside the zone of currently authorized ROEs for electric utilities, 2) is
20 derived from a very small group of comparable companies, and 3) understates an
21 appropriate ROE for Duke Energy Ohio.

1 **Q. HOW DOES STAFF’S RECOMMENDED ROE COMPARE WITH**
2 **ALLOWED RETURNS IN THE ELECTRIC UTILITY INDUSTRY?**

3 A. I believe that Staff’s recommended ROE range of 8.82% - 9.84% with a midpoint
4 of 9.33% lies outside the zone of currently authorized rates of return for electric
5 utilities in the United States. Currently allowed returns, while certainly not a
6 precise indication of any individual company's cost of equity capital, are
7 nevertheless important determinants of investor growth perceptions and investor-
8 expected returns. They also serve to provide some perspective on the validity and
9 reasonableness of Staff’s recommendation.

10 Staff recommends an ROE below the average currently allowed ROE of
11 10.22% in 2011 and 10.36% in 2012 in the utility industry [as reported by SNL
12 (formerly Regulatory Research Associates), in its most recent survey of
13 regulatory decisions dated December 2012].

14 The average currently allowed ROE in the utility industry as reported in
15 the January 2013 edition of AUS Utility Reports is 10.44% in the combination gas
16 and electric utility industry, 10.54% in the electric utility industry, and 10.55% in
17 the gas utility industry. Of the 71 energy utilities covered monthly in AUS Utility
18 Reports, none but one have an allowed return as low as Staff’s recommended
19 midpoint ROE of 9.33%. These authorized returns exceed by a significant margin
20 Staff’s recommended ROE. Moreover, as shown on the table below, the currently
21 authorized ROE for Staff’s five comparable companies averages 10.22%, which
22 again, is much higher than its recommended ROE for Duke Energy Ohio.

Table 1 Authorized Returns

Company	Allowed ROE
Dominion Resources	10.52
Duke Energy	10.57
Consolidated Edison.	9.93
Northeast Utilities	9.38
Xcel Energy	10.70
AVERAGE:	10.22%

Source: AUS Utility Reports 1/2013

In short, Staff's recommendation is outside the mainstream of the allowed rates of return in the industry and lies outside the zone of recently authorized returns for electric utilities and for its sample of companies.

Unreasonable rate treatment for a utility, if implemented, may have serious public policy implications and repercussions. For example, the quality of regulation and the reasonableness of rate of return awards clearly have implications for regulatory climate, economic development and job creation in a given territory. It is my belief that Staff's recommended return has negative implications on these grounds for it provides a disincentive to investment in Ohio and undermines the ability of Duke Energy Ohio to invest in the equipment and other resources needed to operate an electric utility in Ohio.

Moreover, Staff's recommendation could potentially cause adverse consequences on the Company's credit ratings, its financial integrity, the stock of its parent company, the company's capital raising ability, and ultimately ratepayers. Maintaining the Company's strong investment-grade status decreases borrowing costs, improves access to capital and the availability of longer-term debt maturities, and enables the Company to absorb any negative volatility in its

1 financial performance. Maintaining a strong investment-grade bond rating will
2 have beneficial long-term cost implications for the Company and its customers as
3 the Company re-finances existing debt, issues new capital and enters into new
4 contractual arrangements. Clearly, Duke Energy Ohio's customers have a vested
5 interest in a strong financial position for the utility. The interests of customers
6 and shareholders are consistent, not mutually exclusive. They both benefit from a
7 financially sound utility. Staff's understated recommended ROE is detrimental
8 toward maintaining a strong investment-grade status and contrary to customers'
9 interests. Approval of the allowed 10.6% ROE that I have recommended will
10 buttress these goals and provide benefits to Duke Energy Ohio customers.

II. COMPARABLE GROUP

11 **Q. DO YOU AGREE WITH STAFF'S GROUP OF COMPARABLE**
12 **UTILITIES?**

13 A. While I agree with the individual companies in the reference group, the group is
14 far too small, consisting of only five companies. In the current unstable industry
15 and uncertain macroeconomic environment, and for reasons of statistical
16 reliability, it is important to select relatively large sample sizes, as opposed to
17 small sample sizes consisting of a handful of companies. This is because the
18 utility industry capital market data is highly unstable at this time. As a result of
19 this instability, the composition of small groups of companies is very fluid, with
20 companies exiting the sample due to dividend suspensions or reductions,
21 insufficient or unrepresentative historical data due to recent mergers, impending

1 merger or acquisition, and changing corporate identities due to restructuring
2 activities.

3 From a statistical standpoint, confidence in the reliability of the DCF
4 model result is considerably enhanced when applying the DCF model to a large
5 group of companies. Any distortions introduced by measurement errors in the
6 two DCF components of equity return for individual companies, namely dividend
7 yield and growth are mitigated. Utilizing a large portfolio of companies reduces
8 the chance of either overestimating or underestimating the cost of equity for an
9 individual company. For example, in a large group of companies, positive and
10 negative deviations from the expected growth will tend to cancel out owing to the
11 law of large numbers, provided that the errors are independent¹. The average
12 growth rate of several companies is less likely to diverge from expected growth
13 than is the estimate of growth for a single firm. More generally, the assumptions
14 of the DCF model are more likely to be fulfilled for a large group of companies
15 than for any single firm or for a small group of companies.

III. DCF ANALYSIS

16 **Q. DOES STAFF EMPLOY A THREE-STAGE DCF METHOD?**

17 **A.** Yes, it does.

¹ If σ_i^2 represents the average variance of the errors in a group of N companies, and σ_{ij} the average covariance between the errors, then the variance of the error for the group of N companies, σ_N^2 is:

$$\sigma_N^2 = \frac{1}{N} \sigma_i^2 + \frac{N-1}{N} \sigma_{ij}$$

If the errors are independent, the covariance between them (σ_{ij}) is zero, and the variance of the error for the group is reduced to:

$$\sigma_N^2 = \frac{1}{N} \sigma_i^2 \quad \text{As N gets progressively larger, the variance gets smaller and smaller.}$$

1 **Q. DO YOU AGREE WITH STAFF’S IMPLEMENTATION OF THE**
2 **THREE-STAGE DCF METHOD?**

3 A. Yes, I do. I agree with Staff’s implementation of the three-stage DCF method and
4 its choice of DCF growth proxies for all three stages.

IV. CAPM ESTIMATES

5 **Q. DOES STAFF EMPLOY CAPM ESTIMATES?**

6 A. Yes. Staff performs a CAPM analysis summarized on page 17. The CAPM
7 analysis was applied to Staff’s group of five utilities, and produced a ROE of only
8 5.9%, clearly an outlier.

9 **Q. WHAT INPUT DATA DOES A CAPM ANALYSIS REQUIRE?**

10 A. To implement the CAPM, three quantities are required: the risk-free rate (R_F),
11 beta (β), and the market risk premium, ($R_M - R_F$). As shown on page 17, Staff
12 used a risk-free rate of 2.255%, Value Line beta of 0.64, and a market risk
13 premium (MRP) of 5.7%. I discuss each of these inputs below.

V. CAPM RISK-FREE RATE

14 **Q. HOW DOES STAFF DERIVE ITS RISK-FREE RATE PROXY IN THE**
15 **CAPM ANALYSIS?**

16 A. For its risk-free rate proxy, Staff relies on the average yield on 10-year and 30-
17 year U.S. Treasury bonds over the one-year period 9/30/11 – 9/28/12. The
18 averaged 10-year yield is 1.76% and the averaged 30-year yield is 2.75%. This
19 averages to 2.255% for the two.

1 **Q. DR. MORIN, DO YOU AGREE WITH STAFF’S RISK-FREE RATE**
2 **ESTIMATE IN THE CAPM ANALYSIS?**

3 A. No, I do not for several reasons. First, only the yield on 30-year Treasury bonds
4 should be considered as a reasonable proxy. Second, the current yields on
5 Treasury bonds are anomalous at best. Third, and most importantly, the CAPM is
6 a forward-looking model and should rely on prospective interest rates rather than
7 on historical interest rates reaching back one year in time. Let me elaborate
8 further on these concerns.

9 **Q. DO THE YIELDS ON 10-YEAR US TREASURY BONDS PROVIDE**
10 **ADEQUATE PROXIES OF THE RISK-FREE RATE FOR PURPOSES OF**
11 **IMPLEMENTING THE CAPM?**

12 A. No, they do not. The appropriate proxy for the risk-free rate in the CAPM is the
13 return on the longest term Treasury bond possible. This is because common
14 stocks are very long-term instruments more akin to very long-term bonds. Since
15 common stock is a very long-term investment because the cash flows to investors
16 in the form of dividends last indefinitely, the yield on the longest-term possible
17 government bonds, that is the yield on 30-year Treasury bonds, is the best
18 measure of the risk-free rate for use in the CAPM. Moreover, utility asset
19 investments generally have very long-term useful lives and should
20 correspondingly be matched with very long-term maturity financing instruments.

21 Another reason for utilizing the longest maturity Treasury bond possible is
22 that common equity has an infinite life span, and the inflation expectations
23 embodied in its market-required rate of return will therefore be equal to the

1 inflation rate anticipated to prevail over the very long term. The same expectation
2 should be embodied in the risk-free rate used in applying the CAPM model. It
3 stands to reason that the yields on 30-year Treasury bonds will more closely
4 incorporate within their yields the inflation expectations that influence the prices
5 of common stocks than do short-term Treasury bills or intermediate-term U.S.
6 Treasury notes.

7 Among U.S. Treasury securities, 30-year Treasury bonds have the longest
8 term to maturity and the yields on such securities should be used as proxies for
9 the risk-free rate in applying the CAPM.

10 **Q. WHAT INTEREST RATES SHOULD HAVE STAFF’S RELIED UPON AS**
11 **PROXIES FOR THE RISK-FREE RATE IN ITS CAPM ANALYSIS?**

12 A. Staff’s risk-free rate, which is based on history, is too low for purposes of
13 applying the CAPM and fails to reflect the projected increase in interest rates.

14 All the interest rate forecasts that I am aware of point to significantly higher
15 interest rates over the next several years. The table below reports the forecast
16 yields on 30-year US Treasury bonds from three prominent sources: Global
17 Insight, Value Line, and Consensus Economics Inc.

30-YEAR TREASURY YIELD FORECASTS

	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>
Global Insight	4.1	4.6	5.3	5.4
Value Line	3.4	4.0	4.5	
Consensus Economics Inc.	3.4	4.4	5.1	5.4
AVERAGE	3.6	4.3	5.0	5.4

1 Global Insight forecasts a yield of 4.1% in 2014, 4.6% in 2015, 5.3% in
2 2016, and 5.4 in 2017 and thereafter. Value Line's quarterly economic review for
3 November 2012 forecasts a yield of 3.4% in 2014, 4.0% in 2015, and 4.5 in 2016.
4 Consensus Economics Inc.'s October 2012 edition forecasts a yield of 3.4% in
5 2014 rising to 5.4% in 2017.² The average 30-year long-term bond yield forecast
6 from the three sources is 3.6% in 2014, 4.3% in 2015, 5.0% in 2016, and 5.4% in
7 2017. The average over the 2015-2017 period is 4.6%, which also matches the
8 Global Insight 2015 forecast. The rising yield forecasts are also consistent with
9 the sharply upward-sloping yield curve observed at this time. Based on this
10 consistent evidence, a long-term bond yield forecast of 4.6% is a reasonable
11 estimate of the expected risk-free rate for purposes of forward-looking CAPM
12 analysis in the current economic environment. I deem this estimate conservative
13 as interest rate forecasts call for even higher interest rates over the next several
14 years in response to record high federal deficits, higher anticipated inflation, and
15 eventual economic recovery.

16 In short, Staff's risk-free rate proxy of 2.255% is far too low and the
17 average forecast of 4.6% over the 2015-2017 period is far more relevant.
18 Investors price securities on the basis on long-term expectations, including
19 interest rates. As a result, Staff's CAPM estimate is understated 234 basis points
20 $(4.60\% - 2.26\% = 2.34\%)$ from this factor alone.

² Global Insight forecasts are for 30-year bonds, while both Value Line and Consensus Economics forecasts are for 10-year bonds. 50 basis points were added to the 10-year forecasts based on the historical 50 basis points spread between 10 and 30-year yields.

1 **Q. DR. MORIN, WHY SHOULD THE CURRENT LEVEL OF INTEREST**
2 **RATES BE IGNORED IN DEVELOPING A PROXY FOR THE RISK-**
3 **FREE RATE IN A CAPM ANALYSIS?**

4 A. It should be ignored for two reasons. First, the CAPM is an *ex-ante*, or forward-
5 looking model based on expectations of the future. As a result, in order to
6 produce a meaningful estimate of investors' required rate of return, the CAPM
7 must be applied using data that reflects the expectations of actual investors in the
8 market. *Morningstar* (formerly Ibbotson Associates) recognized the primacy of
9 current expectations³:

10 *"The cost of capital is always an expectational or forward- looking*
11 *concept. While the past performance of an investment and other*
12 *historical information can be good guides and are often used to*
13 *estimate the required rate of return on capital, the expectations of*
14 *future events are the only factors that actually determine cost of*
15 *capital."*

16 Second, the CAPM estimate is calibrated from investors' required risk
17 premium between risk-free bonds and common stocks. However, in response to
18 heightened uncertainties, following the 2008-2009 financial crisis, the continuing
19 sovereign debt crises in Europe, and the anemic economic recovery here at home,
20 investors have sought a safe haven in U.S. Treasury bonds, and this "flight to
21 safety" has pushed long-term government bond yields significantly lower while
22 yield spreads for corporate debt have widened. This distortion suggests that

³Morningstar, *Ibbotson SBBI, 2011 Valuation Yearbook* at 21.

1 investors' required risk premium for common stocks over government bonds has
2 also increased.

3 Lower interest rates on long-term US Treasury bonds do not necessitate a
4 commensurate decline in allowed ROEs. This point of view fails to take into
5 consideration several important and relevant factors. First, if the economy is
6 improving, the current low level interest rate environment is only temporary as
7 most interest rate forecasts attest, as shown earlier. Investors are aware that the
8 U.S. central bank (Federal Reserve) is temporarily suppressing interest rates to
9 encourage economic growth. Investors recognize that once central banks change
10 their expansive monetary strategy when the economy rebounds, interest rates
11 could increase quickly and borrowing costs could increase significantly.⁴ In fact,
12 as I showed earlier, interest rate forecasts and the current shape of the yield curve
13 indicate an expected surge in interest rates. Second, the fact that long-term
14 government bond yields and utility bond yields are at historically low levels does
15 not demonstrate that the cost of equity is likewise at historically low levels.
16 Rather, the current low levels of long-term government bond yields are the result
17 of investors' continued risk aversion and a "flight to quality."⁵ Reduced interest
18 rates on safe investments do not necessarily mean that equity market risks have
19 decreased or that investors have materially reduced their return requirements.

⁴ Morgan Stanley posits that likewise, "regulators appear to view the current interest rate environment as unsustainable, and as an indication of market instability and a flight from riskier assets." Morgan Stanley Research, "Regulated Utilities," (Jan. 7, 2012) at 11.

⁵ Flight to quality refers to a sudden shift in investment behaviors in a period of financial turmoil where investors seek to sell assets perceived as risky and instead purchase safe assets.

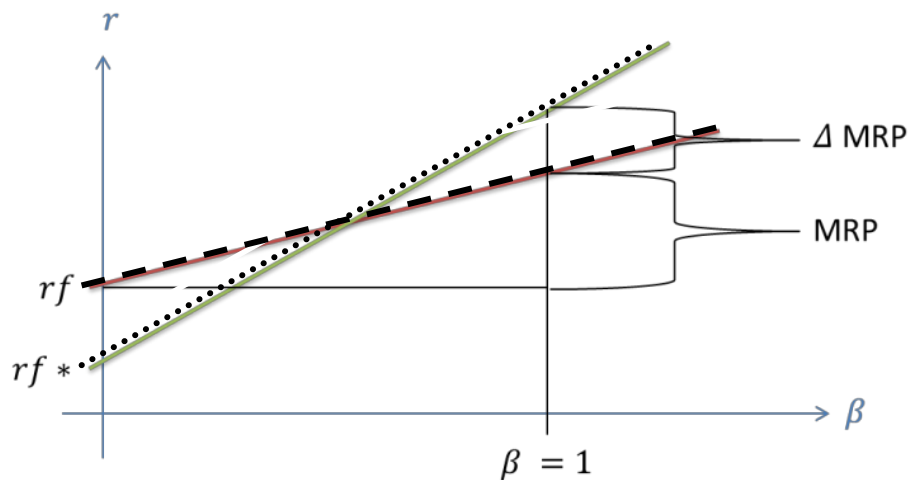
1 Despite the low interest rate climate, equity investors expect that their investments
2 in utilities will provide adequate returns. Morgan Stanley Research reports:

3 *While interest rates have fallen substantially, we believe regulators*
4 *will lower ROEs only modestly....Relative to the significant move*
5 *in Treasuries, the ROEs allowed by regulators have come down*
6 *modestly. In our opinion, this is due to the 'long view' nature of*
7 *utility regulators, as they prefer to set a return level indicative of*
8 *longer-term required return levels.*⁶

9 Recognizing the impact the U.S. Federal Reserve's unprecedented
10 intervention in the capital markets has had on the yields on long-term Treasury
11 bonds, I believe that models that relate the investor-required return on equity to
12 the yield on government securities, such as the CAPM approach, need to be
13 implemented cautiously and recalibrated in order to produce realistic estimates of
14 the ROE at this time.

15 "Flight to quality" can be shown graphically using the traditional CAPM
16 model. A security market line is the relationship between the expected rate of
17 return of a security and its systematic, non-diversifiable risk (beta). The initial
18 security market line (dashed line) on the graph below has a risk-free rate r_f and
19 market risk premium of MRP . In a time of market uncertainty, investors flee to
20 risk-free assets driving the price of r_f down to r_f^* . However, the market's level of
21 uncertainty has increased driving the security market line *steeper* (dotted line).
22 As such, there is an increased market risk premium (MRP). This is why we see
23 large risk premiums when interest rates are low as we do now.

⁶ Morgan Stanley Research, "Regulated Utilities," (Jan. 7, 2012) at 11.



1 Q. DR. MORIN, DO YOU AGREE WITH STAFF'S BETA ESTIMATES IN
2 THE CAPM ANALYSIS?

3 A. Yes, I do.

4 Q. HOW DOES STAFF ESTIMATE THE MRP COMPONENT OF THE
5 CAPM?

6 A. In order to determine the MRP component of the CAPM, Staff relies on the
7 Ibbotson derived spread of arithmetic mean total returns between large company
8 stocks (11.8%) and long-term government bonds (6.1%). The historical difference
9 between realized stock returns and realized total bond returns over the 1926-2011
10 period is 5.7%, which is Staff's estimate of the MRP.

11 Q. DR. MORIN, DO YOU AGREE WITH STAFF'S MRP ESTIMATE IN THE
12 CAPM ANALYSIS?

13 A. No, not quite. For the historical MRP estimate, Staff subtracted total bond returns
14 from stock returns rather than subtracting the income component of bond returns

1 from stock returns. As I discussed in my direct testimony, the income component
2 (i.e., the coupon rate) is a far better estimate of expected return than the total
3 return (i.e., the coupon rate plus capital gains), because realized capital
4 gains/losses are largely unanticipated by investors. For that very reason, the
5 Morningstar (formerly Ibbotson Associates) publication on which Staff relied
6 recommends use of the *income* return on government bonds. In other words,
7 bond investors focus on income rather than realized capital gains/losses. This
8 correction increases Staff's MRP estimate by approximately 40 basis points,
9 which is the historical difference in the MRP based on total bond returns and the
10 MRP based on bond income returns. This in turn translates into a 26 basis points
11 understatement (40 times Beta of 0.64).

VI. CAPM'S EMPIRICAL VALIDITY

12 **Q. DO YOU AGREE WITH STAFF'S USE OF THE RAW FORM OF THE**
13 **CAPM TO ESTIMATE THE COST OF CAPITAL?**

14 A. No, I do not. I believe that the plain vanilla version of the CAPM should be
15 supplemented by the more refined version of the CAPM. There have been
16 countless empirical tests of the CAPM to determine to what extent security
17 returns and betas are related in the manner predicted by the CAPM. The results of
18 the tests support the idea that beta is related to security returns, that the risk-return
19 tradeoff is positive, and that the relationship is linear. The contradictory finding
20 is that the risk-return tradeoff is not as steeply sloped as the predicted CAPM.
21 That is, low-beta securities earn returns somewhat higher than the CAPM would
22 predict, and high-beta securities earn less than predicted. In other words, a

1 CAPM-based estimate of the cost of capital underestimates the return required
2 from low-beta securities and overstates the return from high-beta securities, based
3 on the empirical evidence. This is one of the most well-known results in finance.

4 The empirical form of the CAPM that I used in my direct testimony
5 refines the standard form of the CAPM to account for this phenomenon.

6 The downward-bias inherent in the CAPM is particularly significant for
7 low-beta securities, such as the electric utilities. As a result, Staff's CAPM
8 estimates of equity costs are understated by about 50 basis points.

VII. FLOTATION COST ALLOWANCE

9 **Q. WHAT ALLOWANCE FOR FLOTATION COSTS DOES STAFF MAKE**
10 **WITH RESPECT TO ITS RECOMMENDED ROE FOR DUKE ENERGY**
11 **OHIO?**

12 A. Both Staff and I agree on the need for a flotation cost adjustment, but we disagree
13 on its magnitude. As shown on Schedule D-1.1 lines 7 and 8, Staff recommends
14 an allowance of only 4-6 basis points versus my 30 basis points. I disagree with
15 this adjustment for several reasons. First, I believe there is a computational
16 arithmetic error on Schedule D-1.1. The result of the multiplication in lines 7 and
17 8 should be 8.95% and 9.97% rather than 8.82% and 9.84%, a 13 basis points
18 discrepancy.

19 Second, I believe the generic flotation cost factor of 3.5% shown on line 4
20 ignores the market pressure component of flotation costs, and should be 5.0%
21 instead of 3.5%. According to the empirical finance literature discussed in
22 Appendix B of my direct testimony, total flotation costs amount to 4% for the

1 direct component and 1% for the market pressure component, for a total of 5% of
2 gross proceeds. Staff's 3.5% allowance is therefore understated.

3 Third, and most important, the standard textbook method of computing the
4 magnitude of flotation cost allowance differs from the method used by Staff. As
5 derived in Appendix B of my direct testimony, the utility's required return
6 adjusted for flotation follows directly from the standard DCF model and is as
7 follows, where 'f' is the flotation cost adjustment factor, D_1/P is the expected
8 dividend yield, and g is the growth rate:

$$9 \quad \text{ROE} = D_1/P(1-f) + g$$

10 For flotation costs of 5%, dividing the expected dividend yield by 0.95 will
11 produce the adjusted cost of equity capital. For a dividend yield of 5% for
12 example, the magnitude of the adjustment is 26 basis points: $.05/.95 = .0526$.
13 This in turn amounts to approximately 25 basis points, depending on the
14 magnitude of the dividend yield component.

15 In short, Staff's ROE estimates of equity costs are understated by
16 approximately 20 basis points (25 basis points versus Staff's 4-6 basis points).

VIII. CONCLUSIONS

17 **Q. DR. MORIN, PLEASE PROVIDE A SUMMARY OF THE**
18 **RECOMMENDED CHANGES TO STAFF'S RATE OF RETURN**
19 **TESTIMONY.**

20 **A.** Although there are several areas of agreement between Staff's testimony and my
21 own, I do have some concerns. My only two concerns with Staff's DCF analysis
22 is its lack of statistical reliability as it relies on a very small sample of five

1 companies and an understated flotation cost allowance of only 4-6 basis points
2 which should amount to 20 basis points. The latter adjustment raises Staff's DCF
3 estimate from 10.24% to 10.44%. This estimate is reasonably close to my own
4 recommendation of 10.6%.

5 My concerns with Staff's CAPM analysis are more severe. The following
6 table summarizes the principal reasons why Staff's CAPM results understate an
7 appropriate ROE for Duke Energy Ohio:

8	Source	Basis Points
9	Improper Risk-Free Rate	234
10	MRP Adjustment	26
11	Flotation Cost Understatement	20
12	Empirical CAPM Adjustment	50
13		-----
14	Total Adjustment	330

15 Correction of these understatements would increase Staff's CAPM result
16 by 330 basis points, from 5.9% to 9.2%.

17 Based on these amended results, and giving 75% weight to the DCF result
18 of 10.44% and 25% weight to the CAPM result of 9.2%, as Staff did, the cost of
19 common equity estimate for Duke Energy Ohio becomes 10.13%. Using a 100
20 basis points range of uncertainty, the cost of common equity lies in a range of
21 9.63% to 10.63%. If we ignore the outlying result produced by the fragile and
22 tenuous CAPM at this time, we are left with Staff's DCF estimate of 10.44%.
23 With a 100 basis points range of uncertainty, the ROE lies in a range of

1 approximately 10.0% to 11.0%. I note that my own recommendation of 10.6%
2 lies in the middle of that range.

3 **Q. DOES THIS COMPLETE YOUR SUPPLEMENTAL DIRECT**
4 **TESTIMONY?**

5 A. Yes

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/19/2013 2:34:59 PM

in

Case No(s). 12-1682-EL-AIR, 12-1683-EL-ATA, 12-1684-EL-AAM

Summary: Testimony Supplemental Direct Testimony of Roger A. Morin electronically filed by Ms. Elizabeth H Watts on behalf of Duke Energy Ohio, Inc.