BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates.)	Case No. 21-887-EL-AIR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.)	Case No. 21-888-EL-ATA
In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods.)	Case No. 21-889-EL-AAM

DIRECT TESTIMONY OF

DYLAN W. D'ASCENDIS

ON BEHALF OF

DUKE ENERGY OHIO, INC.

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I. <u>INTRODUCTION AND PURPOSE</u>

1 ().	PLEASE	STATE YOUR	NAME AND	BUSINESS ADDRESS.

- 2 A. My name is Dylan W. D'Ascendis. My business address is 3000 Atrium Way, Suite 241,
- 3 Mount Laurel, New Jersey 08054.
- 4 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?
- 5 A. I am a Partner at ScottMadden, Inc.
- 6 Q. PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE AND
- 7 EDUCATIONAL BACKGROUND.

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A. I have offered expert testimony on behalf of investor-owned utilities before 30 state regulatory commissions in the United States, the Federal Energy Regulatory Commission, the Alberta Utility Commission, an American Arbitration Association panel, and the Superior Court of Rhode Island on issues including, but not limited to, common equity cost rate, rate of return, valuation, capital structure, class cost of service, and rate design.

On behalf of the American Gas Association (AGA), I calculate the AGA Gas Index, which serves as the benchmark against which the performance of the American Gas Index Fund (AGIF) is measured on a monthly basis. The AGA Gas Index and AGIF are a market capitalization weighted index and mutual fund, respectively, comprised of the common stocks of the publicly traded corporate members of the AGA.

I am a member of the Society of Utility and Regulatory Financial Analysts (SURFA). In 2011, I was awarded the professional designation "Certified Rate of Return Analyst" by SURFA, which is based on education, experience, and the successful completion of a comprehensive written examination.

1		I am also a member of the National Association of Certified Valuation Analysts
2		(NACVA) and was awarded the professional designation "Certified Valuation Analyst" by
3		the NACVA in 2015.
4		I am a graduate of the University of Pennsylvania, where I received a Bachelor of
5		Arts degree in Economic History. I have also received a Master of Business Administration
6		with high honors and concentrations in Finance and International Business from Rutgers
7		University.
8		The details of my educational background and expert witness appearances are
9		shown in Appendix A.
10	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THESE PROCEEDINGS?
11	A.	The purpose of my testimony is to present evidence and provide a recommendation
12		regarding Duke Energy Ohio, Inc.'s (Duke Energy Ohio or the Company) return on
13		common equity (ROE) for its electric operations.
14	Q.	HAVE YOU PREPARED ATTACHMENTS IN SUPPORT OF YOUR
15		RECOMMENDATION?
16	A.	Yes. I have prepared Attachments DWD-1 through DWD-8, which were prepared by me
17		or under my direction.
18	Q.	WHAT IS YOUR RECOMMENDED COMMON EQUITY COST RATE?
19	A.	I recommend that the Public Utilities Commission of Ohio (Commission) authorize Duke
20		Energy Ohio the opportunity to earn an ROE of 10.30% on its electric rate base. The
21		ratemaking capital structure and cost of debt is sponsored by Duke Energy Ohio witness
22		Mr. Christopher Bauer. The overall rate of return is summarized on page 1 of Attachment
23		DWD-1 and in Table 1 below:

Table 1: Summary of Recommended Weighted Average Cost of Capital

Type of Capital	Ratios	Cost Rate	Weighted Cost Rate
Long-Term Debt	49.50%	4.16%	2.06%
Common Equity	50.50%	10.30%	<u>5.20%</u>
Total	100.00%		<u>7.26%</u>

1 Q. PLEASE SUMMARIZE YOUR RECOMMENDED COMMON EQUITY COST 2 RATE.

A.

My recommended common equity cost rate of 10.30% is summarized on page 2 of Attachment DWD-1. I have assessed the market-based common equity cost rates of companies of relatively similar, but not necessarily identical, risk to Duke Energy Ohio. Using companies of relatively comparable risk as proxies is consistent with the principles of fair rate of return established in the *Hope*¹ and *Bluefield*² decisions. No proxy group can be <u>identical</u> in risk to any single company. Consequently, there must be an evaluation of relative risk between the company and the proxy group to determine if it is appropriate to adjust the proxy group's indicated rate of return.

My recommendation results from applying several cost of common equity models, specifically the Discounted Cash Flow (DCF) model, the Risk Premium Model (RPM), and the Capital Asset Pricing Model (CAPM), to the market data of a proxy group of fourteen electric utilities (Utility Proxy Group) whose selection criteria will be discussed below. In addition, I applied the DCF model, RPM, and CAPM to a proxy group of 50 domestic, non-price regulated companies comparable in total risk to the Utility Proxy Group (Non-Price Regulated Proxy Group). The results derived from each are as follows:

¹ Federal Power Comm'n v. Hope Natural Gas Co., 320 U.S. 591 (1944).

² Bluefield Water Works Improvement Co. v. Public Serv. Comm'n, 262 U.S. 679 (1923).

Table 2: Summary of Common Equity Cost Rates

Discounted Cash Flow Model	8.86%
Risk Premium Model	10.78%
Capital Asset Pricing Model	12.52%
Cost of Equity Models Applied to Comparable Risk, Non-Price Regulated Companies	12.58%
Indicated Range	9.72% - 11.72%
Size Adjustment	0.15%
Credit Risk Adjustment	0.08%
Flotation Cost Adjustment	<u>0.11%</u>
Recommended Range Recommended Cost of Common Equity	10.06% - 12.06% <u>10.30%</u>

The indicated range of common equity cost rates applicable to the Utility Proxy Group is between 9.72% and 11.72% before any Company-specific adjustments.³ I then adjusted the indicated range by 0.15% and 0.08% to reflect the Company's smaller relative size and greater credit risk, as compared to the Utility Proxy Group companies, and by 0.11% for flotation costs.⁴ These adjustments resulted in a Company-specific indicated range of common equity cost rates between 10.06% and 12.06%.

From this range, I recommend an ROE for the Company toward the lower end of my Company-specific range, specifically 10.30%.

O. HOW IS THE REMAINDER OF YOUR DIRECT TESTIMONY ORGANIZED?

10 A. The remainder of my Direct Testimony is organized as follows:

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<u>Section II</u> – Provides a summary of financial theory and regulatory principles
pertinent to the development of the cost of common equity;

³ The indicated range is 100 basis points above and below the midpoint of my ROE model results.

⁴ See infra Section VI for a detailed discussion of my cost of common equity adjustments.

1		<u>Section III</u> – Explains my selection of the Othity Proxy Group used to develop
2		my cost of common equity analytical results;
3		• <u>Section IV</u> – Describes the analyses on which my cost of common equity
4		recommendation is based;
5		• <u>Section V</u> – Summarizes my common equity cost rate before adjustments to
6		reflect Company-specific factors;
7		• <u>Section VI</u> – Explains my adjustments to my common equity cost rate to reflect
8		Company-specific factors;
9		• <u>Section VII</u> – Presents my conclusions.
		II. GENERAL PRINCIPLES
10	Q.	WHAT GENERAL PRINCIPLES HAVE YOU CONSIDERED IN ARRIVING AT
11		YOUR RECOMMENDED COMMON EQUITY COST RATE OF 10.30%?
12	A.	In unregulated industries, marketplace competition is the principal determinant of the price
13		of products or services. For regulated public utilities, regulation must act as a substitute
14		for marketplace competition. Assuring that the utility can fulfill its obligations to the
15		public, while providing safe and reliable service at all times, requires a level of earnings
16		sufficient to maintain the integrity of presently invested capital. Sufficient earnings also
17		permit the attraction of needed new capital at a reasonable cost, for which the utility must
18		compete with other forms of comparable risk, consistent with the fair rate of return
19		standards established by the U.S. Supreme Court in the previously cited <i>Hope</i> and <i>Bluefield</i>
20		cases.
21		The U.S. Supreme Court affirmed the fair rate of return standards in <i>Hope</i> , when it
22		stated:
23 24		The rate-making process under the Act, i.e., the fixing of "just and reasonable" rates, involves a balancing of the investor and the consumer

interests. Thus, we stated in the *Natural Gas Pipeline Co.* case that "regulation does not ensure that the business shall produce net revenues." 315 U.S. p. 590. But such considerations aside, the investor interest has a legitimate concern with the financial integrity of the company whose rates are being regulated. From the investor or company point of view it is important that there be enough revenue not only for operating expenses but also for the capital costs of the business. These include service on the debt and dividends on the stock. Cf. *Chicago & Grand Trunk Ry. Co.* v. *Wellman*, 143 U.S. 339, 345-346. By that standard the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks. That return, moreover, should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain its credit and to attract capital. See *Missouri ex rel. Southwestern Bell Tel. Co.* v. *Public Service Commission*, 262 U.S. 276, 291 (Mr. Justice Brandeis concurring). ⁵

Consistent with the findings in *Hope*, the Commission's decision in these proceedings should provide the Company with the opportunity to earn a return that is: (1) adequate to attract capital at reasonable cost and terms; (2) sufficient to ensure its financial integrity; and (3) commensurate with returns on investments in enterprises having corresponding risks.

Also, the required return for a regulated public utility is established on a stand-alone basis, *i.e.*, for the utility operating company at issue in a rate case. When funding is provided by a parent entity, the allowed return still must be sufficient to provide an incentive to allocate equity capital to the subsidiary or business unit rather than other internal or external investment opportunities. That is, the regulated subsidiary must compete for capital with all the parent company's affiliates, and with other, similarly situated companies. In that regard, investors value corporate entities on a sum-of-the-parts basis and expect each division within the parent company to provide an appropriate risk-adjusted return.

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⁵ *Hope*, 320 U.S. 591, 603 (1944).

1		It therefore is important that the authorized ROE reflects the risks and prospects of
2		the utility's operations and supports the utility's financial integrity from a stand-alone
3		perspective as measured by their combined business and financial risks. Consequently, the
4		ROE authorized in these proceedings should be sufficient to support the business risk and
5		financial risk of the Company's Ohio electric utility operations on a stand-alone basis.
6	Q.	WITHIN THAT BROAD FRAMEWORK, HOW IS THE COST OF CAPITAL
7		ESTIMATED IN REGULATORY PROCEEDINGS?
8	A.	Regulated utilities primarily use common stock and long-term debt to finance their
9		permanent property, plant, and equipment (i.e., rate base). The fair rate of return for a
10		regulated utility is based on its weighted average cost of capital, in which, as noted earlier,
11		the costs of the individual sources of capital are weighted by their respective book values.
12		The cost of capital is the return investors require to make an investment in a firm.
13		Investors will provide funds to a firm only if the return that they expect is equal to, or
14		greater than, the return that they <u>require</u> to accept the risk of providing funds to the firm.
15		The cost of capital (that is, the combination of the costs of debt and equity) is based
16		on the economic principle of "opportunity costs." Investing in any asset (whether debt or
17		equity securities) represents a forgone opportunity to invest in alternative assets. For any
18		investment to be sensible, its expected return must be at least equal to the return expected
19		on alternative, comparable risk investment opportunities. Because investments with like
20		risks should offer similar returns, the opportunity cost of an investment should equal the
21		return available on an investment of comparable risk.

Whereas the cost of debt is contractually defined and can be directly observed as the interest rate or yield on debt securities, the cost of common equity must be estimated based on market data and various financial models. Because the cost of common equity is

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premised on opportunity costs, the models used to determine it are typically applied to a
group of "comparable" or "proxy" companies.

In the end, the estimated cost of capital should reflect the return that investors require in light of the subject company's business and financial risks, and the returns available on comparable investments.

6 Q. IS THE AUTHORIZED RETURN SET IN REGULATORY PROCEEDINGS 7 GUARANTEED?

A.

A.

No, it is not. Consistent with the *Hope* and *Bluefield* standards, the rate-setting process should provide the utility a reasonable opportunity to recover its return of, and return on, its prudently incurred investments, but it does not guarantee that return. While a utility may have control over some factors that affect the ability to earn its authorized return (*e.g.*, management performance, operating and maintenance expenses, etc.), there are several factors beyond a utility's control that affect its ability to earn its authorized return. Those may include factors such as weather, the economy, and the prevalence and magnitude of regulatory lag.

A. Business Risk

16 Q. PLEASE DEFINE BUSINESS RISK AND EXPLAIN WHY IT IS IMPORTANT 17 FOR DETERMINING A FAIR RATE OF RETURN.

The investor-required return on common equity reflects investors' assessment of the total investment risk of the subject company. Total investment risk is often discussed in the context of business and financial risk.

Business risk reflects the uncertainty associated with owning a company's common stock without the company's use of debt and/or preferred stock financing. One way of considering the distinction between business and financial risk is to view the former as the

uncertainty of the expected earned return on common equity, assuming the firm is financed with no debt.

Examples of business risks generally faced by utilities include, but are not limited to, the regulatory environment, mandatory environmental compliance requirements, customer mix and concentration of customers, service territory economic growth, market demand, risks and uncertainties of supply, operations, capital intensity, size, the degree of operating leverage, and the like, all of which have a direct bearing on earnings. Although analysts, including rating agencies, may categorize business risks individually, as a practical matter, such risks are interrelated and not wholly distinct from one another. For determining an appropriate return on common equity, the relevant issue is where investors see the subject company as falling within a spectrum of risk. To the extent investors view a company as being exposed to high risk, the required return will increase, and vice versa.

For regulated utilities, business risks are both long-term and near-term in nature. Whereas near-term business risks are reflected in year-to-year variability in earnings and cash flow brought about by economic or regulatory factors, long-term business risks reflect the prospect of an impaired ability of investors to obtain both a fair rate of return on, and return of, their capital. Moreover, because utilities accept the obligation to provide safe, adequate and reliable service at all times (in exchange for a reasonable opportunity to earn a fair return on their investment), they generally do not have the option to delay, defer, or reject capital investments. Because those investments are capital-intensive, utilities generally do not have the option to avoid raising external funds during periods of capital market distress, if necessary.

Because utilities invest in long-lived assets, long-term business risks are of paramount concern to equity investors. That is, the risk of not recovering the return on

their investment extends far into the future. The timing and nature of events that may lead to losses, however, also are uncertain and, consequently, those risks and their implications for the required return on equity tend to be difficult to quantify. Regulatory commissions (like investors who commit their capital) must review a variety of quantitative and qualitative data and apply their reasoned judgment to determine how long-term risks weigh in their assessment of the market-required return on common equity.

B. <u>Financial Risk</u>

Q. PLEASE DEFINE FINANCIAL RISK AND EXPLAIN WHY IT IS IMPORTANT IN B DETERMINING A FAIR RATE OF RETURN.

- A. Financial risk is the additional risk created by the introduction of debt and preferred stock into the capital structure. The higher the proportion of debt and preferred stock in the capital structure, the higher the financial risk to common equity owners (*i.e.*, failure to receive dividends due to default or other covenants). Therefore, consistent with the basic financial principle of risk and return, common equity investors demand higher returns as compensation for bearing higher financial risk.
- 15 Q. CAN BOND AND CREDIT RATINGS BE A PROXY FOR A FIRM'S COMBINED

 16 BUSINESS AND FINANCIAL RISKS TO EQUITY OWNERS (I.E., INVESTMENT

 17 RISK)?
- 18 A. Yes, similar bond ratings/issuer credit ratings reflect, and are representative of, similar combined business and financial risks (*i.e.*, total risk) faced by bond investors. Although specific business or financial risks may differ between companies, the same bond/credit rating indicates that the combined risks are roughly similar from a debtholder perspective.

⁶ Risk distinctions within S&P's bond rating categories are recognized by a plus or minus, *e.g.*, within the A category, an S&P rating can be A+, A, or A-. Similarly, risk distinction for Moody's ratings are distinguished by numerical rating gradations, *e.g.*, within the A category, a Moody's rating can be A1, A2, or A3.

- The caveat is that these debtholder risk measures do not translate directly to risks for common equity.
- 3 Q. DO RATING AGENCIES ACCOUNT FOR COMPANY SIZE IN THEIR BOND
- 4 RATINGS?
- A. No. Neither Standard & Poor's (S&P) nor Moody's have minimum company size requirements for any given rating level. This means that, all else equal, a relative size analysis must be conducted for equity investments in companies with similar bond ratings.

III. <u>DUKE ENERGY OHIO'S OPERATIONS</u> <u>AND THE UTILITY PROXY GROUP</u>

8 Q. ARE YOU FAMILIAR WITH DUKE ENERGY OHIO'S OPERATIONS?

- Yes. Duke Energy Ohio, a subsidiary of Duke Energy Corporation (Duke Energy), is A. 9 headquartered in downtown Cincinnati and directs the planning, construction, operation, 10 and maintenance of electric transmission and distribution systems in Ohio and Kentucky.⁷ 11 The Company's Ohio electric operations services approximately over 700,000 customers 12 via approximately 1,609 circuit-miles of transmission lines and 16,549 circuit-miles of 13 distribution lines throughout its territory.⁸ Duke Energy Ohio currently has senior 14 unsecured ratings of Baa1 (outlook: Stable) and BBB+ (outlook: Stable) from Moody's 15 Investor Service and S&P's Rating Services, respectively.⁹ 16
- 17 Q. PLEASE EXPLAIN HOW YOU CHOSE THE COMPANIES IN THE UTILITY
 18 PROXY GROUP.
- 19 A. The companies selected for the Utility Proxy Group met the following criteria:
- 20 (i) They were included in the Eastern, Central, or Western Electric Utility
 21 Group of *Value Line* (Standard Edition);

⁷ Source: S&P Global Market Intelligence.

⁸ Company provided.

⁹ Source: S&P Global Market Intelligence.

1	(ii)	They have 70% or greater of fiscal year 2020 total operating income derived
2		from, and 70% or greater of fiscal year 2020 total assets attributable to,
3		regulated electric operations;
4	(iii)	At the time of preparation of this testimony, they had not publicly
5		announced that they were involved in any major merger or acquisition
6		activity (i.e., one publicly-traded utility merging with or acquiring another);
7	(iv)	They have not cut or omitted their common dividends during the five years
8		ended 2020 or through the time of preparation of this testimony;
9	(v)	They have Value Line and Bloomberg Professional Services (Bloomberg)
10		adjusted betas;
11	(vi)	They have positive Value Line five-year dividends per share (DPS) growth
12		rate projections; and
13	(vii)	They have Value Line, Zacks, Yahoo! Finance, or Bloomberg consensus
14		five-year earnings per share (EPS) growth rate projections.

The following fourteen companies met these criteria:

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Table 3: Utility Proxy Group Companies

Company Name	Ticker Symbol
Alliant Energy Corporation	LNT
Ameren Corporation	AEE
Duke Energy Corporation	DUK
Edison International	EIX
Entergy Corporation	ETR
Evergy, Inc.	EVRG
Eversource Energy	ES
IDACORP, Inc.	IDA
NorthWestern Corporation	NWE
OGE Energy Corporation	OGE
Otter Tail Corporation	OTTR
Pinnacle West Capital Corporation	PNW
Portland General Electric Co.	POR
Xcel Energy, Inc.	XEL

Q. WHY IS IT NECESSARY TO DEVELOP A PROXY GROUP WHEN

ESTIMATING THE ROE FOR THE COMPANY?

A.

Because the Company is not publicly traded and does not have publicly traded equity securities, it is necessary to develop groups of publicly traded, comparable companies to serve as "proxies" for the Company. In addition to the analytical necessity of doing so, the use of proxy companies is consistent with the *Hope* and *Bluefield* comparable risk standards, as discussed above. I have selected two proxy groups that, in my view, are fundamentally risk-comparable to the Company: a Utility Proxy Group and a Non-Price Regulated Proxy Group, which is comparable in total risk to the Utility Proxy Group. ¹⁰

Even when proxy groups are carefully selected, it is common for analytical results to vary from company to company. Despite the care taken to ensure comparability, because no two companies are identical, market expectations regarding future risks and prospects will vary within the proxy group. It therefore is common for analytical results to reflect a

¹⁰ The development of the Non-Price Regulated Proxy Group is explained in more detail in Section IV.

seemingly wide range, even for a group of similarly situated companies. At issue is how to estimate the ROE from within that range. That determination will be best informed by employing a variety of sound analyses that necessarily must consider the sort of quantitative and qualitative information discussed throughout my Direct Testimony. Additionally, a relative risk analysis between the Company and the Utility Proxy Group must be made to determine whether or not explicit Company-specific adjustments need to be made to the Utility Proxy Group indicated results.

IV. COMMON EQUITY COST RATE MODELS

8 Q. IS IT IMPORTANT THAT COST OF COMMON EQUITY MODELS BE MARKET

BASED?

A.

A.

Yes. A public utility must compete for equity in capital markets along with all other companies of comparable risk, which includes non-utilities. The cost of common equity is thus determined based on equity market expectations for the returns of those comparable risk companies. If an individual investor is choosing to invest their capital among companies of comparable risk, they will choose a company providing a higher return over a company providing a lower return.

Q. ARE YOUR COST OF COMMON EQUITY MODELS MARKET BASED?

Yes. The DCF model uses market prices in developing the model's dividend yield component. The RPM uses bond ratings and expected bond yields that reflect the market's assessment of bond/credit risk. In addition, beta coefficients (β), which reflect the market/systematic risk component of equity risk premium, are derived from regression analyses of market prices. The Predictive Risk Premium Model (PRPM) uses monthly market returns in addition to expectations of the risk-free rate. The CAPM is market based for many of the same reasons that the RPM is market based (*i.e.*, the use of expected bond

yields and betas). Selection criteria for comparable risk non-price regulated companies are based on regression analyses of market prices and reflect the market's assessment of total risk.

4 Q. WHAT ANALYTICAL APPROACHES DID YOU USE TO DETERMINE THE 5 COMPANY'S ROE?

As discussed earlier, I have relied on the DCF model, the RPM, and the CAPM, which I apply to the Utility Proxy Group described above. I also applied these same models to a Non-Price Regulated Proxy Group described later in this section.

I rely on these models because reasonable investors use a variety of tools and do not rely exclusively on a single source of information or single model. Moreover, the models on which I rely focus on different aspects of return requirements, and provide different insights to investors' views of risk and return. The DCF model, for example, estimates the investor-required return assuming a constant expected dividend yield and growth rate in perpetuity, while Risk Premium-based methods (*i.e.*, the RPM and CAPM approaches) provide the ability to reflect investors' views of risk, future market returns, and the relationship between interest rates and the cost of common equity. Just as the use of market data for the Utility Proxy Group adds the reliability necessary to inform expert judgment in arriving at a recommended common equity cost rate, the use of multiple generally accepted common equity cost rate models also adds reliability and accuracy when arriving at a recommended common equity cost rate.

A. <u>Discounted Cash Flow Model</u>

21 Q. WHAT IS THE THEORETICAL BASIS OF THE DCF MODEL?

A. The theory underlying the DCF model is that the present value of an expected future stream of net cash flows during the investment holding period can be determined by discounting

those cash flows at the cost of capital, or the investors' capitalization rate. DCF theory indicates that an investor buys a stock for an expected total return rate, which is derived from the cash flows received from dividends and market price appreciation.

Mathematically, the dividend yield on market price plus a growth rate equals the capitalization rate; *i.e.*, the total common equity return rate expected by investors as shown below:

$$K_e = (D_0 (1+g))/P + g$$

8 where:

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9 K_e = the required Return on Common Equity;

 $D_0 =$ the annualized Dividend Per Share;

P = the current stock price; and

g =the growth rate.

13 Q. WHICH VERSION OF THE DCF MODEL DID YOU USE?

14 A. I used the single-stage constant growth DCF model in my analyses.

15 Q. PLEASE DESCRIBE THE DIVIDEND YIELD YOU USED IN APPLYING THE 16 CONSTANT GROWTH DCF MODEL.

- 17 A. The unadjusted dividend yields are based on the proxy companies' dividends as of August
- 31, 2021, divided by the average closing market price for the 60 trading days ended August
- 19 31, 2021.¹¹

20 O. PLEASE EXPLAIN YOUR ADJUSTMENT TO THE DIVIDEND YIELD.

- A. Because dividends are paid periodically (*e.g.*, quarterly), as opposed to continuously (daily), an adjustment must be made to the dividend yield. This is often referred to as the
- discrete, or the Gordon Periodic, version of the DCF model.
- DCF theory calls for using the full growth rate, or D_1 , in calculating the model's
- dividend yield component. Since the companies in the Utility Proxy Group increase their

¹¹ See, column 1, page 1 of Attachment DWD-2.

quarterly dividends at various times during the year, a reasonable assumption is to reflect one-half the annual dividend growth rate in the dividend yield component, or $D_{1/2}$. Because the dividend should be representative of the next 12-month period, this adjustment is a conservative approach that does not overstate the dividend yield. Therefore, the actual average dividend yields in Column 1, page 1 of Attachment DWD-2 have been adjusted upward to reflect one-half the average projected growth rate shown in Column 5.

A.

A.

Q. PLEASE EXPLAIN THE BASIS FOR THE GROWTH RATES YOU APPLY TO THE UTILITY PROXY GROUP IN YOUR CONSTANT GROWTH DCF MODEL.

Investors are likely to rely on widely available financial information services, such as *Value Line*, Zacks, and Yahoo! Finance. Investors realize that analysts have significant insight into the dynamics of the industries and individual companies they analyze, as well as companies' ability to effectively manage the effects of changing laws and regulations, and ever-changing economic and market conditions. For these reasons, I used analysts' five-year forecasts of EPS growth in my DCF analysis.

Over the long run, there can be no growth in DPS without growth in EPS. Security analysts' earnings expectations have a more significant influence on market prices than dividend expectations. Thus, using earnings growth rates in a DCF analysis provides a better match between investors' market price appreciation expectations and the growth rate component of the DCF.

Q. PLEASE SUMMARIZE THE CONSTANT GROWTH DCF MODEL RESULTS.

As shown on page 1 of Attachment DWD-2, for the Utility Proxy Group, the mean result of applying the single-stage DCF model is 8.82%, the median result is 8.89%, and the average of the two is 8.86%. In arriving at a conclusion for the constant growth DCF-indicated common equity cost rate for the Utility Proxy Group, I relied on an average of

the mean and the median results of the DCF. This approach considers all the proxy utilities' results, while mitigating the high and low outliers of those individual results.

B. The Risk Premium Model

3 Q. PLEASE DESCRIBE THE THEORETICAL BASIS OF THE RPM.

A. The RPM is based on the fundamental financial principle of risk and return; namely, that investors require greater returns for bearing greater risk. The RPM recognizes that common equity capital has greater investment risk than debt capital, as common equity shareholders are behind debt holders in any claim on a company's assets and earnings. As a result, investors require higher returns from common stocks than from bonds to compensate them for bearing the additional risk.

While it is possible to directly observe bond returns and yields, investors' required common equity returns cannot be directly determined or observed. According to RPM theory, one can estimate a common equity risk premium over bonds (either historically or prospectively) and use that premium to derive a cost rate of common equity. The cost of common equity equals the expected cost rate for long-term debt capital, plus a risk premium over that cost rate, to compensate common shareholders for the added risk of being unsecured and last-in-line for any claim on the corporation's assets and earnings upon liquidation.

Q. PLEASE EXPLAIN HOW YOU DERIVED YOUR INDICATED COST OF COMMON EQUITY BASED ON THE RPM.

A. To derive my indicated cost of common equity under the RPM, I used two risk premium methods. The first method was the PRPM and the second method was a risk premium model using a total market approach. The PRPM estimates the risk-return relationship

directly, while the total market approach indirectly derives a risk premium by using known metrics as a proxy for risk.

1. The Predictive Risk Premium Model

3 Q. PLEASE EXPLAIN THE PRPM.

A.

The PRPM, published in the *Journal of Regulatory Economics*, ¹² was developed from the work of Robert F. Engle, who shared the Nobel Prize in Economics in 2003 "for methods of analyzing economic time series with time-varying volatility (ARCH)." Engle found that volatility changes over time and is related from one period to the next, especially in financial markets. Engle discovered that volatility of prices and returns cluster over time and is therefore highly predictable and can be used to predict future levels of risk and risk premiums.

The PRPM estimates the risk-return relationship directly, as the predicted equity risk premium is generated by predicting volatility or risk. The PRPM is not based on an estimate of investor behavior, but rather on an evaluation of the results of that behavior (*i.e.*, the variance of historical equity risk premiums).

The inputs to the model are the historical returns on the common shares of each Utility Proxy Group company minus the historical monthly yield on long-term U.S. Treasury securities through August 2021. Using a generalized form of ARCH, known as GARCH, I calculated each Utility Proxy Group company's projected equity risk premium using Eviews[©] statistical software. When the GARCH model is applied to the historical return data, it produces a predicted GARCH variance series¹⁴ and a GARCH coefficient¹⁵.

¹² Autoregressive conditional heteroscedasticity. *See* "A New Approach for Estimating the Equity Risk Premium for Public Utilities", Pauline M. Ahern, Frank J. Hanley and Richard A. Michelfelder, *The Journal of Regulatory Economics* (December 2011), 40:261-278.

¹³ www.nobelprize.org.

¹⁴ Illustrated on Columns 1 and 2, page 2 of Attachment DWD-3.

¹⁵ Illustrated on Column 4, page 2 of Attachment DWD-3.

Multiplying the predicted monthly variance by the GARCH coefficient and then annualizing it 16 produces the predicted annual equity risk premium. I then added the forecasted 30-year U.S. Treasury bond yield of 2.70% 17 to each company's PRPM-derived equity risk premium to arrive at an indicated cost of common equity. The 30-year U.S. Treasury bond yield is a consensus forecast derived from Blue Chip Financial Forecasts (*Blue Chip*). 18 The mean PRPM indicated common equity cost rate for the Utility Proxy Group is 11.17%, the median is 10.59%, and the average of the two is 10.88%. Consistent with my reliance on the average of the median and mean results of the DCF models, I relied on the average of the mean and median results of the Utility Proxy Group PRPM to calculate a cost of common equity rate of 10.88%.

11 Q. PLEASE DESCRIBE YOUR SELECTION OF A RISK-FREE RATE OF RETURN.

A. As shown in Attachments DWD-3 and DWD-4, the risk-free rate adopted for applications of the RPM and CAPM is 2.70%. This risk-free rate is based on the average of the *Blue Chip* consensus forecast of the expected yields on 30-year U.S. Treasury bonds for the six quarters ending with the fourth calendar quarter of 2022, and long-term projections for the years 2023 to 2027 and 2028 to 2032.

Q. WHY DO YOU USE THE PROJECTED 30-YEAR TREASURY YIELD IN YOUR ANALYSES?

A. The yield on long-term U.S. Treasury bonds is almost risk-free and its term is consistent with the long-term cost of capital to public utilities measured by the yields on Moody's A2-rated public utility bonds; the long-term investment horizon inherent in utilities' common stocks; and the long-term life of the jurisdictional rate base to which the allowed

¹⁶ Annualized Return = $(1 + Monthly Return)^{12} - 1$

¹⁷ See Column 6, page 2 of Attachment DWD-3.

¹⁸Blue Chip Financial Forecasts, June 1, 2021 at page 14 and September 1, 2021 at page 2.

fair rate of return (*i.e.*, cost of capital) will be applied. In contrast, short-term U.S. Treasury yields are more volatile and largely a function of Federal Reserve monetary policy. Because both ratemaking and the cost of capital, including common equity cost rate, are prospective in nature, a prospective yield on long-term debt is essential.

2. The Total Market Risk Premium Approach

5 Q. PLEASE EXPLAIN THE TOTAL MARKET APPROACH RPM.

A.

A. The total market approach RPM adds a prospective public utility bond yield to an average of: (1) an equity risk premium that is derived from a beta-adjusted total market equity risk premium, (2) an equity risk premium based on the S&P Utilities Index, and (3) an equity risk premium based on authorized ROEs for electric utilities.

10 Q. PLEASE EXPLAIN THE BASIS OF THE EXPECTED BOND YIELD OF 3.87% APPLICABLE TO THE UTILITY PROXY GROUP.

The first step in the total market approach RPM analysis is to determine the expected bond yield. As discussed above, ratemaking and the cost of capital, including common equity cost rate, are prospective in nature, a prospective yield on similarly-rated long-term debt is essential. I relied on a consensus forecast of about 50 economists of the expected yield on Aaa-rated corporate bonds for the six calendar quarters ending with the fourth calendar quarter of 2022, and *Blue Chip*'s long-term projections for 2023 to 2027, and 2028 to 2032. As shown on line 1, page 3 of Attachment DWD-3, the average expected yield on Moody's Aaa-rated corporate bonds is 3.41%. To derive an expected yield on Moody's A2-rated public utility bonds, I made an upward adjustment of 0.38%, which represents a recent spread between Aaa-rated corporate bonds and A2-rated public utility bonds, in order to adjust the expected Aaa-rated corporate bond yield to an equivalent A2-rated public utility

bond yield.¹⁹ Adding that recent 0.38% spread to the expected Aaa-rated corporate bond yield of 3.41% results in an expected A2-rated public utility bond yield of 3.79%.

I then reviewed the average credit rating for the Utility Proxy Group from Moody's to determine if an adjustment to the estimated A2-rated public utility bond was necessary. Since the Utility Proxy Group's average Moody's long-term issuer rating is A3, another adjustment to the expected A2-rated public utility bond is needed to reflect the difference in bond ratings. An upward adjustment of 0.08%, which represents one-third of a recent spread between A2-rated and Baa2-rated public utility bond yields, is necessary to make the A2 prospective bond yield applicable to an A3-rated public utility bond.²⁰ Adding the 0.08% to the 3.79% prospective A2-rated public utility bond yield results in a 3.87% expected bond yield applicable to the Utility Proxy Group.

<u>Table 4: Summary of the Calculation of the Utility Proxy Group Projected Bond</u>
<u>Yield</u>²¹

Prospective Yield on Moody's Aaa-Rated Corporate Bonds (<i>Blue Chip</i>)	3.41%
Adjustment to Reflect Yield Spread Between Moody's Aaa- Rated Corporate Bonds and Moody's A2-Rated Utility Bonds	0.38%
Adjustment to Reflect the Utility Proxy Group's Average Moody's Bond Rating of A3	0.08%
Prospective Bond Yield Applicable to the Utility Proxy Group	<u>3.87%</u>

¹⁹ As shown on line 2 and explained in note 2, page 3 of Attachment DWD-3.

²⁰ As shown on line 4 and explained in note 3, page 3 of Attachment DWD-3. Moody's does not provide public utility bond yields for A3-rated bonds. As such, it was necessary to estimate the difference between A2-rated and A3-rated public utility bonds. Because there are three steps between Baa2 and A2 (Baa2 to Baa1, Baa1 to A3, and A3 to A2) I assumed an adjustment of one-third of the difference between the A2-rated and Baa2-rated public utility bond yield was appropriate.

²¹ As shown on page 3 of Attachment DWD-3.

To develop the indicated ROE using the total market approach RPM, this prospective bond yield is then added to the average of the three different equity risk premiums described below.

The Beta-Derived Risk Premium a.

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- Q. PLEASE EXPLAIN HOW THE BETA-DERIVED EQUITY RISK PREMIUM IS 4 5 DETERMINED.
- The components of the beta-derived risk premium model are: (1) an expected market equity 6 A. risk premium over corporate bonds, and (2) the beta coefficient. The derivation of the beta-7 8 derived equity risk premium that I applied to the Utility Proxy Group is shown on lines 1 9 through 9, page 8 of Attachment DWD-3. The total beta-derived equity risk premium I 10 applied is based on an average of three historical market data-based equity risk premiums, 11 two Value Line-based equity risk premiums, and a Bloomberg-based equity risk premium. Each of these is described below. 12
- HOW DID YOU DERIVE A MARKET EQUITY RISK PREMIUM BASED ON Q. 13 LONG-TERM HISTORICAL DATA? 14
- To derive a historical market equity risk premium, I used the most recent holding period 15 A. returns for the large company common stocks from the Stocks, Bonds, Bills, and Inflation 16 (SBBI) Yearbook 2021 (SBBI - 2021)²² less the average historical yield on Moody's 17 Aaa/Aa-rated corporate bonds for the period 1928 to 2020. Using holding period returns 18 over a very long time is appropriate because it is consistent with the long-term investment 19 horizon presumed by investing in a going concern, i.e., a company expected to operate in 20 perpetuity.

²² SBBI Appendix A Tables: Morningstar Stocks, Bonds, Bills, & Inflation 1926-2020.

SBBI's long-term arithmetic mean monthly total return rate on large company common stocks was 11.94%, and the long-term arithmetic mean monthly yield on Moody's Aaa/Aa-rated corporate bonds was 6.02%.²³ As shown on line 1, page 8 of Attachment DWD-3, subtracting the mean monthly bond yield from the total return on large company stocks results in a long-term historical equity risk premium of 5.92%.

I used the arithmetic mean monthly total return rates for the large company stocks and yields (income returns) for the Moody's Aaa/Aa corporate bonds, because they are appropriate for the purpose of estimating the cost of capital as noted in SBBI - 2021.²⁴ Using the arithmetic mean return rates and yields is appropriate because historical total returns and equity risk premiums provide insight into the variance and standard deviation of returns needed by investors in estimating future risk when making a current investment. If investors relied on the geometric mean of historical equity risk premiums, they would have no insight into the potential variance of future returns, because the geometric mean relates the change over many periods to a constant rate of change, thereby obviating the year-to-year fluctuations, or variance, which is critical to risk analysis.

Q. PLEASE EXPLAIN THE DERIVATION OF THE REGRESSION-BASED MARKET EQUITY RISK PREMIUM.

To derive the regression-based market equity risk premium of 8.87% shown on line 2, page 8 of Attachment DWD-3, I used the same monthly annualized total returns on large company common stocks relative to the monthly annualized yields on Moody's Aaa/Aarated corporate bonds as mentioned above. I modeled the relationship between interest rates and the market equity risk premium using the observed monthly market equity risk premium as the dependent variable, and the monthly yield on Moody's Aaa/Aa-rated

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²³ As explained in note 1, page 9 of Attachment DWD-3.

²⁴ SBBI - 2020, at 10-22 and 10-23.

1 corporate bonds as the independent variable. I then used a linear Ordinary Least Squares
2 (OLS) regression, in which the market equity risk premium is expressed as a function of
3 the Moody's Aaa/Aa-rated corporate bonds yield:

 $RP = \alpha + \beta (R_{Aaa/Aa})$

5 Q. PLEASE EXPLAIN THE DERIVATION OF THE PRPM EQUITY RISK 6 PREMIUM.

I used the same PRPM approach described above to the PRPM equity risk premium. The inputs to the model are the historical monthly returns on large company common stocks minus the monthly yields on Moody's Aaa/Aa-rated corporate bonds during the period from January 1928 through August 2021.²⁵ Using the previously discussed GARCH, the projected equity risk premium is determined using Eviews[©] statistical software. The resulting PRPM predicted a market equity risk premium of 7.88%.²⁶

13 Q. PLEASE EXPLAIN THE DERIVATION OF A PROJECTED EQUITY RISK 14 PREMIUM BASED ON VALUE LINE DATA FOR YOUR RPM ANALYSIS.

As noted above, because both ratemaking and the cost of capital are prospective, a prospective market equity risk premium is needed. The derivation of the forecasted or prospective market equity risk premium can be found in note 4, page 9 of Attachment DWD-3. Consistent with my calculation of the dividend yield component in my DCF analysis, this prospective market equity risk premium is derived from an average of the three- to five-year median market price appreciation potential by *Value Line* for the 13 weeks ended September 3, 2021, plus an average of the median estimated dividend yield for the common stocks of the 1,700 firms covered in *Value Line*'s *Standard Edition*.²⁷

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²⁵ Data from January 1928 to December 2020 is from <u>SBBI - 2021</u>. Data from January 2021 to August 2021 is from Bloomberg.

²⁶ Shown on line 3, page 8 of Attachment DWD-3.

²⁷ As explained in detail in note 1, page 2 of Attachment DWD-4.

1	The average median expected price appreciation is 32%, which translates to a
2	7.19% annual appreciation, and, when added to the average of Value Line's median
3	expected dividend yields of 1.76%, equates to a forecasted annual total return rate on the
4	market of 8.95%. The forecasted Moody's Aaa-rated corporate bond yield of 3.41% is
5	deducted from the total market return of 8.95%, resulting in an equity risk premium of
6	5.54%, as shown on line 4, page 8 of Attachment DWD-3.

7 Q. PLEASE EXPLAIN THE DERIVATION OF AN EQUITY RISK PREMIUM BASED 8 ON THE S&P 500 COMPANIES.

9 A. Using data from *Value Line*, I calculated an expected total return on the S&P 500 companies

10 using expected dividend yields and long-term growth estimates as a proxy for capital

11 appreciation. The expected total return for the S&P 500 is 15.05%. Subtracting the

12 prospective yield on Moody's Aaa-rated corporate bonds of 3.41% results in an 11.64%

13 projected equity risk premium.

14 Q. PLEASE EXPLAIN THE DERIVATION OF AN EQUITY RISK PREMIUM BASED 15 ON BLOOMBERG DATA.

16 A. Using data from Bloomberg, I calculated an expected total return on the S&P 500 using
17 expected dividend yields and long-term growth estimates as a proxy for capital
18 appreciation, identical to the method described above. The expected total return for the
19 S&P 500 is 18.17%. Subtracting the prospective yield on Moody's Aaa-rated corporate
20 bonds of 3.41% results in a 14.76% projected equity risk premium.

Q. WHAT IS YOUR CONCLUSION OF A BETA-DERIVED EQUITY RISK PREMIUM FOR USE IN YOUR RPM ANALYSIS?

A. I gave equal weight to all six equity risk premiums in arriving at a 9.10% equity risk premium.

<u>Table 5: Summary of the Calculation of the Equity Risk Premium Using Total</u>

Market Returns²⁸

Historical Spread Between Total Returns of Large Stocks and Aaa and Aa2-Rated Corporate Bond Yields (1928 – 2020)	5.92%
Regression Analysis on Historical Data	8.87%
PRPM Analysis on Historical Data	7.88%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected Aaa Corporate Bond Yields	5.54%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P 500 less Projected Aaa Corporate Bond Yields	11.64%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected Aaa Corporate Bond Yields	14.76%
Average	9.10%

After calculating the average market equity risk premium of 9.10%, I adjusted it by the beta coefficient to account for the risk of the Utility Proxy Group. As discussed below, beta is a meaningful measure of prospective relative risk to the market as a whole, and is a logical way to allocate a company's or proxy group's share of the market's total equity risk premium relative to corporate bond yields. As shown on page 1 of Attachment DWD-4, the average of the mean and median beta for the Utility Proxy Group is 0.99. Multiplying the 0.99 average by the market equity risk premium of 9.10% results in a beta-adjusted equity risk premium for the Utility Proxy Group of 9.01%.

b. The S&P Utility Index Derived Risk Premium

9 Q. HOW DID YOU DERIVE THE EQUITY RISK PREMIUM BASED ON THE S&P 10 UTILITY INDEX AND MOODY'S A-RATED PUBLIC UTILITY BONDS?

11 A. I estimated three equity risk premiums based on S&P Utility Index holding period returns, 12 and two equity risk premiums based on the expected returns of the S&P Utilities Index, 13 using *Value Line* and Bloomberg data, respectively. Turning first to the S&P Utility Index

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²⁸ As shown on page 8 of Attachment DWD-3.

holding period returns, I derived a long-term monthly arithmetic mean equity risk premium between the S&P Utility Index total returns of 10.65%, and monthly Moody's A-rated public utility bond yields of 6.49% from 1928 to 2020, to arrive at an equity risk premium of 4.16%. ²⁹ I then used the same historical data to derive an equity risk premium of 6.51% based on a regression of the monthly equity risk premiums. The final S&P Utility Index holding period equity risk premium involved applying the PRPM using the historical monthly equity risk premiums from January 1928 to August 2021 to arrive at a PRPM-derived equity risk premium of 4.94% for the S&P Utility Index.

I then derived expected total returns on the S&P Utilities Index of 10.94% and 9.11% using data from *Value Line* and Bloomberg, respectively, and subtracted the prospective Moody's A2-rated public utility bond yield of 3.79%,³⁰ which resulted in equity risk premiums of 7.15% and 5.32%, respectively. As with the market equity risk premiums, I averaged each risk premium to arrive at my utility-specific equity risk premium of 5.62%.

<u>Table 6: Summary of the Calculation of the Equity Risk Premium Using S&P</u>
<u>Utility Index Holding Returns</u>³¹

Historical Spread Between Total Returns of the S&P Utilities Index and A2-Rated Utility Bond Yields (1928 – 2020)	4.16%
Regression Analysis on Historical Data	6.51%
PRPM Analysis on Historical Data	4.94%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P Utilities Index less Projected A2 Utility Bond Yields	7.15%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P Utilities Index less Projected A2 Utility Bond Yields	<u>5.32%</u>
Average	<u>5.62%</u>

²⁹ As shown on line 1, page 12 of Attachment DWD-3.

³⁰ Derived on line 3, page 3 of Attachment DWD-3.

³¹ As shown on page 12 of Attachment DWD-3.

c. Authorized Return-Derived Equity Risk Premium

1 Q. HOW DID YOU DERIVE AN EQUITY RISK PREMIUM OF 5.81% BASED ON 2 AUTHORIZED ROES FOR ELECTRIC UTILITIES?

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The equity risk premium of 5.81% shown on line 3, page 7 of Attachment DWD-3 is the A. result of a regression analysis based on regulatory awarded ROEs related to the yields on Moody's A-rated public utility bonds. That analysis is shown on page 13 of Attachment DWD-3 which contains the graphical results of a regression analysis of 1183 rate cases for electric utilities which were fully litigated during the period from January 1, 1980 through August 31, 2021. It shows the implicit equity risk premium relative to the yields on Arated public utility bonds immediately prior to the issuance of each regulatory decision. It is readily discernible that there is an inverse relationship between the yield on A-rated public utility bonds and equity risk premiums. In other words, as interest rates decline, the equity risk premium rises and vice versa, a result consistent with financial literature on the subject.³² I used the regression results to estimate the equity risk premium applicable to the projected yield on Moody's A2-rated public utility bonds of 3.79%. Given the expected A-rated utility bond yield of 3.79%, it can be calculated that the indicated equity risk premium applicable to that bond yield is 5.81%, which is shown on line 3, page 7 of Attachment DWD-3.

Q. WHAT IS YOUR CONCLUSION OF AN EQUITY RISK PREMIUM FOR USE IN YOUR TOTAL MARKET APPROACH RPM ANALYSIS?

A. The equity risk premium I apply to the Utility Proxy Group is 6.81%, which is the average of the beta-adjusted equity risk premium for the Utility Proxy Group, the S&P Utilities

³² See, e.g., Robert S. Harris and Felicia C. Marston, "The Market Risk Premium: Expectational Estimates Using Analysts' Forecasts", *Journal of Applied Finance*, Vol. 11, No. 1, 2001, at pages 11 to 12; Eugene F. Brigham, Dilip K. Shome, and Steve R. Vinson, "The Risk Premium Approach to Measuring a Utility's Cost of Equity", *Financial Management*, Spring 1985, at pages 33 to 45.

- Index, and the authorized return utility equity risk premiums of 9.01%, 5.62%, and 5.81%, respectively.³³
- **Q.** WHAT IS THE INDICATED RPM COMMON EQUITY COST RATE BASED ON

4 THE TOTAL MARKET APPROACH?

As shown on line 7, page 3 of Attachment DWD-3, I calculated a common equity cost rate of 10.68% for the Utility Proxy Group based on the total market approach RPM.

Table 7: Summary of the Total Market Return Risk Premium Model³⁴

Prospective Moody's A3-Rated Utility Bond Applicable to the Utility Proxy Group	3.87%
Prospective Equity Risk Premium	<u>6.81%</u>
Indicated Cost of Common Equity	<u>10.68%</u>

7 Q. WHAT ARE THE RESULTS OF YOUR APPLICATION OF THE PRPM AND THE

8 TOTAL MARKET APPROACH RPM?

As shown on page 1 of Attachment DWD-3, the indicated RPM-derived common equity cost rate is 10.78%, which gives equal weight to the PRPM (10.88%) and the adjusted-market approach results (10.68%).

C. The Capital Asset Pricing Model

12 Q. PLEASE EXPLAIN THE THEORETICAL BASIS OF THE CAPM.

A. CAPM theory defines risk as the co-variability of a security's returns with the market's returns as measured by the beta coefficient (β). A beta coefficient less than 1.0 indicates lower variability than the market as a whole, while a beta coefficient greater than 1.0 indicates greater variability than the market.

The CAPM assumes that all non-market or unsystematic risk can be eliminated through diversification. The risk that cannot be eliminated through diversification is called

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³⁴ As shown on page 3 of Attachment DWD-3.

³³ As shown on page 7 of Attachment DWD-3.

market, or systematic, risk. In addition, the CAPM presumes that investors only require compensation for systematic risk, which is the result of macroeconomic and other events that affect the returns on all assets. The model is applied by adding a risk-free rate of return to a market risk premium, which is adjusted proportionately to reflect the systematic risk of the individual security relative to the total market as measured by the beta coefficient.

The traditional CAPM model is expressed as:

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7		R_s	=	$R_f + \beta (R_m - R_f)$
8	Where:	R_{s}	=	Return rate on the common stock
9		R_{f}	=	Risk-free rate of return
10		R_{m}	=	Return rate on the market as a whole
11		β	=	Adjusted beta coefficient (volatility of the
12				security relative to the market as a whole)

Numerous tests of the CAPM have measured the extent to which security returns and beta coefficients are related as predicted by the CAPM, confirming its validity. The empirical CAPM (ECAPM) reflects the reality that while the results of these tests support the notion that the beta coefficient is related to security returns, the empirical Security Market Line (SML) described by the CAPM formula is not as steeply sloped as the predicted SML.³⁵

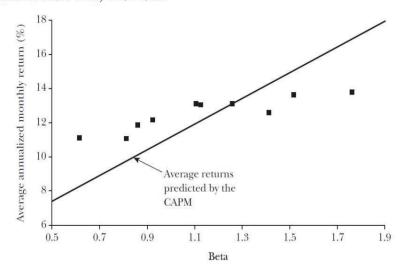
The ECAPM reflects this empirical reality. Fama and French clearly state regarding Figure 2, below, that "[t]he returns on the low beta portfolios are too high, and the returns on the high beta portfolios are too low." 36

³⁵ Roger A. Morin, New Regulatory Finance (Public Utility Reports, Inc., 2006), at 175. (Morin)

³⁶ Eugene F. Fama and Kenneth R. French, "The Capital Asset Pricing Model: Theory and Evidence", Journal of Economic Perspectives, Vol. 18, No. 3, Summer 2004 at 33 (Fama & French).

 $Figure~2 \qquad {\rm http://pubs.aeaweb.org/doi/pdfplus/10.1257/0895330042162430}$

Average Annualized Monthly Return versus Beta for Value Weight Portfolios Formed on Prior Beta, 1928–2003



In addition, Morin observes that while the results of these tests support the notion that beta is related to security returns, the empirical SML described by the CAPM formula is not as steeply sloped as the predicted SML. Morin states:

With few exceptions, the empirical studies agree that ... low-beta securities earn returns somewhat higher than the CAPM would predict, and high-beta securities earn less than predicted.³⁷

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Therefore, the empirical evidence suggests that the expected return on a security is related to its risk by the following approximation:

$$K = R_F + x \beta(R_M - R_F) + (1-x) \beta(R_M - R_F)$$

where x is a fraction to be determined empirically. The value of x that best explains the observed relationship [is] Return = $0.0829 + 0.0520 \beta$ is between 0.25 and 0.30. If x = 0.25, the equation becomes:

$$K = R_F + 0.25(R_M - R_F) + 0.75 \beta(R_M - R_F)^{38}$$

Fama and French provide similar support for the ECAPM when they state:

The early tests firmly reject the Sharpe-Lintner version of the CAPM. There is a positive relation between beta and average return, but it is too 'flat.'... The regressions consistently find that the intercept is greater than the

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³⁸Morin, at 190.

³⁷Morin, at 175.

1 2 3		excess market return This is true in the early tests as well as in more recent cross-section regressions tests, like Fama and French (1992). ³⁹
4		Finally, Fama and French further note:
5 6 7 8 9 10		Confirming earlier evidence, the relation between beta and average return for the ten portfolios is much flatter than the Sharpe-Linter CAPM predicts. The returns on low beta portfolios are too high, and the returns on the high beta portfolios are too low. For example, the predicted return on the portfolio with the lowest beta is 8.3 percent per year; the actual return as 11.1 percent. The predicted return on the portfolio with the t beta is 16.8 percent per year; the actual is 13.7 percent.
12		Clearly, the justification from Morin, Fama, and French, along with their reviews
13		of other academic research on the CAPM, validate the use of the ECAPM. In view of
14		theory and practical research, I have applied both the traditional CAPM and the ECAPM
15		to the companies in the Utility Proxy Group and averaged the results.
16	Q.	WHAT BETAS DID YOU USE IN YOUR CAPM ANALYSIS?
17	A.	For the betas in my CAPM analysis, I considered two sources: Value Line and Bloomberg
18		Professional Services. While both of those services adjust their calculated (or "raw") betas
19		to reflect the tendency of beta to regress to the market mean of 1.00, Value Line calculates
20		their beta over a five-year period, while Bloomberg calculates it over a two-year period.
21	Q.	PLEASE DESCRIBE YOUR SELECTION OF A RISK-FREE RATE OF RETURN.
22	A.	As discussed previously, the risk-free rate adopted for both applications of the CAPM is
23		2.70%. This risk-free rate is based on the average of the <i>Blue Chip</i> consensus forecast of
24		the expected yields on 30-year U.S. Treasury bonds for the six quarters ending with the
25		fourth calendar quarter of 2022, and long-term projections for the years 2023 to 2027 and

2028 to 2032.

 $^{^{39}}$ Fama & French, at 32. 40 *Ibid.*, at 33.

Q. PLEASE EXPLAIN THE ESTIMATION OF THE EXPECTED RISK PREMIUM FOR THE MARKET USED IN YOUR CAPM ANALYSES.

A.

The basis of the market risk premium is explained in detail in note 1 on Attachment DWD-4. As discussed above, the market risk premium is derived from an average of three historical data-based market risk premiums, two *Value Line* data-based market risk premiums, and one Bloomberg data-based market risk premium.

The long-term income return on U.S. Government securities of 5.05% was deducted from the <u>SBBI - 2021</u> monthly historical total market return of 12.20%, which results in an historical market equity risk premium of 7.15%. ⁴¹ I applied a linear OLS regression to the monthly annualized historical returns on the S&P 500 relative to historical yields on long-term U.S. Government securities from <u>SBBI - 2021</u>. That regression analysis yielded a market equity risk premium of 9.57%. The PRPM market equity risk premium is 8.77% and is derived using the PRPM relative to the yields on long-term U.S. Treasury securities from January 1926 through August 2021.

The *Value Line*-derived forecasted total market equity risk premium is derived by deducting the forecasted risk-free rate of 2.70%, discussed above, from the *Value Line* projected total annual market return of 8.95%, resulting in a forecasted total market equity risk premium of 6.25%. The S&P 500 projected market equity risk premium using *Value Line* data is derived by subtracting the projected risk-free rate of 2.70% from the projected total return of the S&P 500 of 15.05%. The resulting market equity risk premium is 12.35%.

The S&P 500 projected market equity risk premium using Bloomberg data is derived by subtracting the projected risk-free rate of 2.70% from the projected total return

⁴¹ SBBI - 2021, at Appendix A-1 (1) through A-1 (3) and Appendix A-7 (19) through A-7 (21).

of the S&P 500 of 18.17%. The resulting market equity risk premium is 15.47%. These six measures, when averaged, result in an average total market equity risk premium of 9.93%.

Table 8: Summary of the Calculation of the Market Risk Premium for Use in the CAPM⁴²

Historical Spread Between Total Returns of Large Stocks and Long-Term Government Bond Yields (1926 – 2020)	7.15%
Regression Analysis on Historical Data	9.57%
PRPM Analysis on Historical Data	8.77%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected 30-Year Treasury Bond Yields	6.25%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P 500 less Projected 30-Year Treasury Bond Yields	12.35%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected 30-Year Treasury Bond Yields	<u>15.47%</u>
Average	<u>9.93%</u>

4 Q. WHAT ARE THE RESULTS OF YOUR APPLICATION OF THE TRADITIONAL

AND EMPIRICAL CAPM TO THE UTILITY PROXY GROUP?

- A. As shown on page 1 of Attachment DWD-4, the mean result of my CAPM/ECAPM analyses is 12.59%, the median is 12.45%, and the average of the two is 12.52%.

 Consistent with my reliance on the average of mean and median DCF results discussed above, the indicated common equity cost rate using the CAPM/ECAPM is 12.52%.
 - D. <u>Common Equity Cost Rates for a Proxy Group of Domestic, Non-Price</u>

 Regulated Companies Based on the DCF, RPM, and CAPM

10 Q. WHY DO YOU ALSO CONSIDER A PROXY GROUP OF DOMESTIC, NON11 PRICE REGULATED COMPANIES?

12 A. In the *Hope* and *Bluefield* cases, the U.S. Supreme Court did not specify that comparable 13 risk companies had to be utilities. Since the purpose of rate regulation is to be a substitute

⁴² As shown on page 2 of Attachment DWD-4.

1		for marketplace competition, non-price regulated firms operating in the competitive
2		marketplace make an excellent proxy group if they are comparable in total risk to the Utility
3		Proxy Group being used to estimate the cost of common equity. The selection of such
4		domestic, non-price regulated competitive firms theoretically and empirically results in a
5		proxy group which is comparable in total risk to the Utility Proxy Group, since all of these
6		companies compete for capital in the exact same markets.
7	Q.	HOW DID YOU SELECT NON-PRICE REGULATED COMPANIES THAT ARE
8		COMPARABLE IN TOTAL RISK TO THE UTILITY PROXY GROUP?
9	A.	In order to select a proxy group of domestic, non-price regulated companies similar in total
9 10	A.	In order to select a proxy group of domestic, non-price regulated companies similar in total risk to the Utility Proxy Group, I relied on the betas and related statistics derived from
	A.	
10	A.	risk to the Utility Proxy Group, I relied on the betas and related statistics derived from
10 11	A.	risk to the Utility Proxy Group, I relied on the betas and related statistics derived from <i>Value Line</i> regression analyses of weekly market prices over the most recent 260 weeks
10 11 12	A.	risk to the Utility Proxy Group, I relied on the betas and related statistics derived from <i>Value Line</i> regression analyses of weekly market prices over the most recent 260 weeks (<i>i.e.</i> , five years). These selection criteria resulted in a proxy group of 50 domestic, non-
10 11 12 13	A.	risk to the Utility Proxy Group, I relied on the betas and related statistics derived from <i>Value Line</i> regression analyses of weekly market prices over the most recent 260 weeks (<i>i.e.</i> , five years). These selection criteria resulted in a proxy group of 50 domestic, non-price regulated firms comparable in total risk to the Utility Proxy Group. Total risk is the

Edition);

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- They must be domestic, non-price regulated companies, i.e., not utilities; (ii)
- (iii) Their unadjusted betas must lie within plus or minus two standard deviations of the average unadjusted betas of the Utility Proxy Group; and
- (iv) The residual standard errors of the Value Line regressions which gave rise to the unadjusted betas must lie within plus or minus two standard deviations of the average residual standard error of the Utility Proxy Group.

		Betas measure market, or systematic, risk, which is not diversifiable. The residual standard
2		errors of the regressions measure each firm's company-specific, diversifiable risk.
3		Companies that have similar unadjusted betas <u>and</u> similar residual standard errors resulting
4		from the same regression analyses have similar total investment risk.
5	Q.	HAVE YOU PREPARED AN ATTACHMENT THAT SHOWS THE DATA FROM
6		WHICH YOU SELECTED THE 50 DOMESTIC, NON-PRICE REGULATED
7		COMPANIES THAT ARE COMPARABLE IN TOTAL RISK TO THE UTILITY
8		PROXY GROUP?
9	A.	Yes, the basis of my selection and both proxy groups' regression statistics are shown in
10		Attachment DWD-5.
11	Q.	DID YOU CALCULATE COMMON EQUITY COST RATES USING THE DCF
12		MODEL, RPM, AND CAPM FOR THE NON-PRICE REGULATED PROXY
13		GROUP?
14	A.	Yes. Because the DCF model, RPM, and CAPM have been applied in an identical manner
	11.	Test. Because the Bet medel, it is, and ern in have even approved in an accuracy manner
15	Α.	as described above, I will not repeat the details of the rationale and application of each
	Α.	
15	Α.	as described above, I will not repeat the details of the rationale and application of each
15 16	A.	as described above, I will not repeat the details of the rationale and application of each model. One exception is in the application of the RPM, where I did not use public utility-
15 16 17	Α.	as described above, I will not repeat the details of the rationale and application of each model. One exception is in the application of the RPM, where I did not use public utility-specific equity risk premiums, nor did I apply the PRPM to the individual non-price
15 16 17 18	A	as described above, I will not repeat the details of the rationale and application of each model. One exception is in the application of the RPM, where I did not use public utility-specific equity risk premiums, nor did I apply the PRPM to the individual non-price regulated companies.
15 16 17 18 19	A.	as described above, I will not repeat the details of the rationale and application of each model. One exception is in the application of the RPM, where I did not use public utility-specific equity risk premiums, nor did I apply the PRPM to the individual non-price regulated companies. Page 2 of Attachment DWD-6 derives the constant growth DCF model common
15 16 17 18 19 20	A.	as described above, I will not repeat the details of the rationale and application of each model. One exception is in the application of the RPM, where I did not use public utility-specific equity risk premiums, nor did I apply the PRPM to the individual non-price regulated companies. Page 2 of Attachment DWD-6 derives the constant growth DCF model common equity cost rate. As shown, the indicated common equity cost rate, using the constant
15 16 17 18 19 20 21	A.	as described above, I will not repeat the details of the rationale and application of each model. One exception is in the application of the RPM, where I did not use public utility-specific equity risk premiums, nor did I apply the PRPM to the individual non-price regulated companies. Page 2 of Attachment DWD-6 derives the constant growth DCF model common equity cost rate. As shown, the indicated common equity cost rate, using the constant growth DCF for the Non-Price Regulated Proxy Group comparable in total risk to the

1		Attachment DWD-6, the consensus prospective yield on Moody's Baa-rated corporate
2		bonds for the six quarters ending in the fourth quarter of 2022, and for the years 2023 to
3		2027 and 2028 to 2032, is 4.30%. ⁴³ Since the Non-Price Regulated Proxy Group has an
4		average Moody's long-term issuer rating of Baa1, a 0.12% downward adjustment of the
5		prospective Baa2-rated corporate bond yield is necessary to reflect a difference in ratings. ⁴⁴
6		When the beta-adjusted risk premium of 8.46% ⁴⁵ relative to the Non-Price
7		Regulated Proxy Group is added to the adjusted prospective Baa2-rated corporate bond
8		yield of 4.18%, the indicated RPM common equity cost rate is 12.64%.
9		Page 6 of Attachment DWD-6 contains the inputs and calculations that support my
10		indicated CAPM/ECAPM common equity cost rate of 12.00%.
11	Q.	HOW IS THE COST RATE OF COMMON EQUITY BASED ON THE NON-PRICE
12		REGULATED PROXY GROUP COMPARABLE IN TOTAL RISK TO THE
13		UTILITY PROXY GROUP?
14	A.	As shown on page 1 of Attachment DWD-6, the results of the common equity models
15		applied to the Non-Price Regulated Proxy Group which group is comparable in total risk
16		to the Utility Proxy Group are as follows: 12.92% (DCF), 12.64% (RPM), and 12.00%
17		(CAPM). The average of the mean and median of these models is 12.58%, which I used

as the indicated common equity cost rates for the Non-Price Regulated Proxy Group.

⁴³ Blue Chip Financial Forecasts, June 1, 2021 at page 14 and September 1, 2021 at page 2.
⁴⁴ The 0.12% downward adjustment is equal to one third of the spread between A2 and Baa2 corporate bond yields, as illustrated in Note 2 on Page 3 of Attachment DWD-6.
⁴⁵ Derived on page 5 of Attachment DWD-6.

V. <u>CONCLUSION OF COMMON EQUITY COST</u> <u>RATE BEFORE ADJUSTMENTS</u>

1 Q. WHAT ARE THE INDICATED COMMON EQUITY COST RATES BEFORE

2 **ADJUSTMENTS?**

A. By applying multiple cost of common equity models to the Utility Proxy Group and the 3 Non-Price Regulated Proxy Group, the indicated range of common equity cost rates before 4 any relative risk adjustment is between 9.72% and 11.72%. I used multiple cost of common 5 equity models as primary tools in arriving at my recommended common equity cost rate, 6 because no single model is so inherently precise that it can be relied on to the exclusion of 7 other theoretically sound models. Using multiple models adds reliability to the estimated 8 9 common equity cost rate, with the prudence of using multiple cost of common equity models supported in both the financial literature and regulatory precedent. 10

VI. ADJUSTMENTS TO THE COMMON EQUITY COST RATE

A. Size Adjustment

- 11 Q. PLEASE COMPARE DUKE ENERGY OHIO'S SIZE WITH THAT OF THE
- 12 UTILITY PROXY GROUP.
- A. As shown in Table 9 below, Duke Energy Ohio is smaller than the utilities in the Utility
 Proxy Group, as measured by market capitalization.

<u>Table 9: Size as Measured by Market Capitalization for Duke Energy Ohio and the</u>

<u>Utility Proxy Group</u>

	Market Capitalization* (\$ Millions)	Times Greater than The Company
Duke Energy Ohio	\$3,517.131	
Utility Proxy Group	\$15,358.236	4.4x
*From page 1 of Attachment DWD-7.		

Duke Energy Ohio's estimated market capitalization was \$3.5 billion as of August 31, 2021,⁴⁶ compared with the market capitalization of the median company in the Utility Proxy Group of \$15.4 billion as of August 31, 2021. The median company in the Utility Proxy Group has a market capitalization 4.4 times the size of Duke Energy Ohio's estimated market capitalization.

A.

Q. SINCE DUKE ENERGY OHIO IS A SUBSIDIARY OF DUKE ENERGY, WHY IS THE SIZE OF THE TOTAL COMPANY NOT MORE APPROPRIATE TO USE WHEN DETERMINING THE SIZE ADJUSTMENT?

As discussed previously, rates are set using the stand-alone principle, which maintains that the utility operations of a diversified firm should be regulated as though they were independent (*i.e.*, without subsidies to or from affiliated companies). Because of this, the return derived in these proceedings will not apply to Duke Energy as a whole, but only Duke Energy Ohio's electric operations. Duke Energy is the sum of its constituent parts, including those constituent parts' ROEs. Potential investors in the Company are aware that it is a combination of operations in each state, and that each state's operations experience the operating risks specific to their jurisdiction. The market's expectation of Duke Energy's

⁴⁶ \$1,768.291 million (company-provided book equity as of the 4th Quarter 2020) * 198.9% (market-to-book ratio of the Utility Proxy Group) as demonstrated on page 2 of Attachment DWD-7.

1		return is commensurate with the realities of its composite operations in each of the states
2		in which it operates.
3	Q.	DOES DUKE ENERGY OHIO'S SMALLER SIZE RELATIVE TO THE UTILITY
4		PROXY GROUP COMPANIES INCREASE ITS BUSINESS RISK?
5	A.	Yes. Duke Energy Ohio's smaller size relative to the Utility Proxy Group companies
6		indicates greater relative business risk for the Company because, all else being equal, size
7		has a material bearing on risk.
8		Size affects business risk because smaller companies generally are less able to cope
9		with significant events that affect sales, revenues and earnings. For example, smaller
10		companies face more risk exposure to business cycles and economic conditions, both
11		nationally and locally. Additionally, the loss of revenues from a few larger customers
12		would have a greater effect on a small company than on a bigger company with a larger,
13		more diverse, customer base.
14		As further evidence that smaller companies are riskier, investors generally demand
15		greater returns from smaller firms to compensate for less marketability and liquidity of
16		their securities. Duff & Phelps 2020 Valuation Handbook Guide to Cost of Capital - Market
17		Results through 2019 (D&P - 2020) discusses the nature of the small-size phenomenon,
18		providing an indication of the magnitude of the size premium based on several measures
19		of size. In discussing "Size as a Predictor of Equity Premiums," <u>D&P - 2020</u> states:
20 21 22 23		The size effect is based on the empirical observation that companies of smaller size are associated with greater risk and, therefore, have greater cost of capital [sic]. The "size" of a company is one of the most important risk elements to consider when developing cost of equity capital estimates for
2425		use in valuing a business simply because size has been shown to be a <i>predictor</i> of equity returns. In other words, there is a significant (negative)
26		relationship between size and historical equity returns - as size decreases,

1 2	returns tend to <i>increase</i> , and vice versa. (footnote omitted) (emphasis in original) ⁴⁷
3	Furthermore, in "The Capital Asset Pricing Model: Theory and Evidence," Fama
4	and French note size is indeed a risk factor which must be reflected when estimating the
5	cost of common equity. On page 38, they note:
6 7 8 9	the higher average returns on small stocks and high book-to-market stocks reflect unidentified state variables that produce undiversifiable risks (covariances) in returns not captured in the market return and are priced separately from market betas. 48
10	Based on this evidence, Fama and French proposed their three-factor model which
11	includes a size variable in recognition of the effect size has on the cost of common equity.
12	Also, it is a basic financial principle that the use of funds invested, and not the
13	source of funds, is what gives rise to the risk of any investment. ⁴⁹ Eugene Brigham, a well-
14	known authority, states:
15 16 17 18 19 20 21	A number of researchers have observed that portfolios of small-firms (sic) have earned consistently higher average returns than those of large-firm stocks; this is called the "small-firm effect." On the surface, it would seem to be advantageous to the small firms to provide average returns in a stock market that are higher than those of larger firms. In reality, it is bad news for the small firm; what the small-firm effect means is that the capital market demands higher returns on stocks of small firms than on otherwise similar stocks of the large firms. (emphasis added) ⁵⁰
23	Consistent with the financial principle of risk and return discussed above, increased
24	relative risk due to small size must be considered in the allowed rate of return on common
25	equity. Therefore, the Commission's authorization of a cost rate of common equity in these
26	proceedings must appropriately reflect the unique risks of Duke Energy Ohio, including its

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small size, which is justified and supported above by evidence in the financial literature.

⁴⁷ Duff & Phelps <u>Valuation Handbook – U.S. Guide to Cost of Capital</u>, Wiley 2020, at 4-1. ⁴⁸ Fama and French, at 25-43.

⁴⁹ Richard A. Brealey and Stewart C. Myers, <u>Principles of Corporate Finance</u> (McGraw-Hill Book Company, 1996),

⁵⁰ Eugene F. Brigham, <u>Fundamentals of Financial Management</u>, <u>Fifth Edition</u> (The Dryden Press, 1989), at 623.

Q. IS THERE A WAY TO QUANTIFY A RELATIVE RISK ADJUSTMENT DUE TO DUKE ENERGY OHIO'S SMALL SIZE RELATIVE TO THE UTILITY PROXY GROUP?

A. Yes. As mentioned above, Duke Energy Ohio has greater relative risk than the median utility in the Utility Proxy Group because of its smaller size compared with the utilities in that group.

As a result, it is necessary to upwardly adjust the range of indicated common equity cost rates between 9.72% to 11.72% to reflect Duke Energy Ohio's greater risk due to its smaller relative size. The determination is based on the size premiums for portfolios of New York Stock Exchange, American Stock Exchange, and NASDAQ listed companies ranked by deciles for the 1926 to 2020 period. The average size premium for the Utility Proxy Group with a market capitalization of \$15.4 billion falls in the 2nd decile, while the Company's estimated market capitalization of \$3.5 billion places it in the 5th decile. The size premium spread between the 2nd decile and the 5th decile is 0.60%. Even though a 0.60% upward size adjustment is indicated, I applied a size premium of 0.15% to the Company's range of indicated common equity cost rates.

B. Credit Risk Adjustment

17 Q. PLEASE DISCUSS YOUR PROPOSED CREDIT RISK ADJUSTMENT.

A. Duke Energy Ohio's long-term issuer ratings are Baa1 and BBB+ from Moody's Investors

Services and S&P, respectively, which are riskier than the average long-term issuer ratings

for the Utility Proxy Group of A3 and BBB+, respectively. Hence, an upward credit risk

adjustment is necessary to reflect the lower credit rating, *i.e.*, Baa1, of Duke Energy Ohio

relative to the A3 average Moody's bond rating of the Utility Proxy Group.

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⁵¹ Source: S&P Global Market Intelligence.

⁵² As shown on page 5 of Attachment DWD-3.

An indication of the magnitude of the necessary upward adjustment to reflect the 1 greater credit risk inherent in a Baal bond rating is one-third of a recent three-month 2 average spread between Moody's A2 and Baa2-rated public utility bond yields of 0.25%, 3 shown on page 4 of Attachment DWD-3, or 0.08%. 53 4 **Flotation Cost Adjustment** C. WHAT ARE FLOTATION COSTS? 0. 5 Flotation costs are those costs associated with the sale of new issuances of common stock. 6 A. They include market pressure and the mandatory unavoidable costs of issuance (e.g., 7 underwriting fees and out-of-pocket costs for printing, legal, registration, etc.). For every 8 dollar raised through debt or equity offerings, the Company receives less than one full 9 dollar in financing. 10 WHY IS IT IMPORTANT TO RECOGNIZE FLOTATION COSTS IN THE 0. 11 12 ALLOWED COMMON EQUITY COST RATE?

A. It is important because there is no other mechanism in the ratemaking paradigm through which such costs can be recognized and recovered. Because these costs are real, necessary, and legitimate, recovery of these costs should be permitted. As noted by Morin:

The costs of issuing these securities are just as real as operating and maintenance expenses or costs incurred to build utility plants, and fair regulatory treatment must permit recovery of these costs....

The simple fact of the matter is that common equity capital is not free....[Flotation costs] must be recovered through a rate of return adjustment.⁵⁴

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 $^{^{53} 0.08\% = 0.25\% * (1/3).}$

⁵⁴ Morin, at p. 321.

Q. SHOULD FLOTATION COSTS BE RECOGNIZED ONLY IF THERE WAS AN ISSUANCE DURING THE TEST YEAR OR THERE IS AN IMMINENT POST-TEST YEAR ISSUANCE OF ADDITIONAL COMMON STOCK?

A.

No. As noted above, there is no mechanism to recapture such costs in the ratemaking paradigm other than an adjustment to the allowed common equity cost rate. Flotation costs are charged to capital accounts and are not expensed on a utility's income statement. As such, flotation costs are analogous to capital investments, albeit negative, reflected on the balance sheet. Recovery of capital investments relates to the expected useful lives of the investment. Since common equity has a very long and indefinite life (assumed to be infinity in the standard regulatory DCF model), flotation costs should be recovered through an adjustment to common equity cost rate, even when there has not been an issuance during the test year, or in the absence of an expected imminent issuance of additional shares of common stock.

Historical flotation costs are a permanent loss of investment to the utility and should be accounted for. When any company, including a utility, issues common stock, flotation costs are incurred for legal, accounting, printing fees and the like. For each dollar of issuing market price, a small percentage is expensed and is permanently unavailable for investment in utility rate base. Since these expenses are charged to capital accounts and not expensed on the income statement, the only way to restore the full value of that dollar of issuing price with an assumed investor required return of 10% is for the net investment, \$0.95, to earn more than 10% to net back to the investor a fair return on that dollar. In other words, if a company issues stock at \$1.00 with 5% in flotation costs, it will net \$0.95 in investment. Assuming the investor in that stock requires a 10% return on his or her invested \$1.00 (i.e.,

- a return of \$0.10), the company needs to earn approximately 10.5% on its invested \$0.95 to receive a \$0.10 return.
- Q. DO THE COMMON EQUITY COST RATE MODELS YOU HAVE USED

 ALREADY REFLECT INVESTORS' ANTICIPATION OF FLOTATION COSTS?
- No. All of these models assume no transaction costs. The literature is quite clear that these costs are not reflected in the market prices paid for common stocks. For example, Brigham and Daves confirm this and provide the methodology utilized to calculate the flotation adjustment. In addition, Morin confirms the need for such an adjustment even when no new equity issuance is imminent. Consequently, it is proper to include a flotation cost adjustment when using cost of common equity models to estimate the common equity cost rate.

12 Q. HOW DID YOU CALCULATE THE FLOTATION COST ALLOWANCE?

- 13 A. I modified the DCF calculation to provide a dividend yield that would reimburse investors
 14 for issuance costs in accordance with the method cited in literature by Brigham and Daves,
 15 as well as by Morin. The flotation cost adjustment recognizes the actual costs of issuing
 16 equity that were incurred by Duke Energy in its last three equity issuances. Based on the
 17 issuance costs shown on page 1 of Attachment DWD-8, an adjustment of 0.11% is required
 18 to reflect the flotation costs applicable to the Utility Proxy Group.
- 19 Q. WHAT IS THE INDICATED COST OF COMMON EQUITY AFTER YOUR
 20 COMPANY-SPECIFIC ADJUSTMENTS?
- A. Applying the 0.15% size adjustment, the 0.08% credit risk adjustment, and the 0.11% flotation cost adjustment to the indicated cost of common equity range of 9.72% to 11.72%

⁵⁵ Eugene F. Brigham and Phillip R. Daves, <u>Intermediate Financial Management</u>, 9th Edition, Thomson/Southwestern, at p. 342.

⁵⁶ Morin, at pp. 327-330.

- results in a Company-specific cost of common equity rate range of 10.06% to 12.06%. I
- recommend an ROE at the lower end of my range, or 10.30%, as applicable to Duke Energy
- 3 Ohio at this time.

VII. <u>CONCLUSION</u>

- 4 Q. WHAT IS YOUR RECOMMENDED ROE FOR DUKE ENERGY OHIO?
- 5 A. Given the indicated ROE range applicable to the Utility Proxy Group of 9.72% to 11.72%
- and the Company-specific ROE range of 10.06% to 12.06%, I conclude that an appropriate
- 7 ROE for the Company is 10.30%.
- 8 Q. IN YOUR OPINION, IS YOUR PROPOSED ROE OF 10.30% FAIR AND
- 9 REASONABLE TO DUKE ENERGY OHIO AND ITS CUSTOMERS?
- 10 A. Yes, it is.
- 11 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
- 12 A. Yes, it does.



PUCO Case No. 21-887-EL-AIR
Appendix A
Page 1 of 5
Resume & Testimony Listing of:

Dylan W. D'Ascendis, CRRA, CVA
Partner

Summary

Dylan is an experienced consultant and a Certified Rate of Return Analyst (CRRA) and Certified Valuation Analyst (CVA). Dylan joined ScottMadden in 2016 and has become a leading expert witness with respect to cost of capital and capital structure. He has served as a consultant for investor-owned and municipal utilities and authorities for 13 years. Dylan has testified as an expert witness on over 100 occasions regarding rate of return, cost of service, rate design, and valuation before more than 30 regulatory jurisdictions in the United States and Canada, an American Arbitration Association panel, and the Superior Court of Rhode Island. He also maintains the benchmark index against which the Hennessy Gas Utility Mutual Fund performance is measured. Dylan holds a B.A. in economic history from the University of Pennsylvania and an M.B.A. with concentrations in finance and international business from Rutgers University.

Areas of Specialization

- Regulation and Rates
- Rate of Return
- Valuation
- Mutual Fund Benchmarking
- Capital Market Risk
- Regulatory Strategy
- Cost of Service

Recent Expert Testimony Submission/Appearance

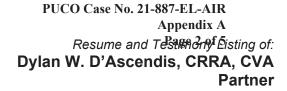
- Regulatory Commission of Alaska Capital Structure
- Federal Energy Regulatory Commission Rate of Return
- Public Utility Commission of Texas Return on Equity
- Hawaii Public Utilities Commission Cost of Service / Rate Design
- Pennsylvania Public Utility Commission Valuation

Recent Articles and Speeches

- Co-Author of: "Decoupling, Risk Impacts and the Cost of Capital", co-authored with Richard A.
 Michelfelder, Ph.D., Rutgers University and Pauline M. Ahern. The Electricity Journal, March, 2020
- Co-Author of: "Decoupling Impact and Public Utility Conservation Investment", co-authored with Richard A. Michelfelder, Ph.D., Rutgers University and Pauline M. Ahern. Energy Policy Journal, 130 (2019), 311-319
- "Establishing Alternative Proxy Groups", before the Society of Utility and Regulatory Financial Analysts: 51st Financial Forum, April 4, 2019, New Orleans, LA
- "Past is Prologue: Future Test Year", Presentation before the National Association of Water Companies 2017 Southeast Water Infrastructure Summit, May 2, 2017, Savannah, GA.
- Co-author of: "Comparative Evaluation of the Predictive Risk Premium Model™, the Discounted Cash Flow Model and the Capital Asset Pricing Model", co-authored with Richard A. Michelfelder, Ph.D., Rutgers University, Pauline M. Ahern, and Frank J. Hanley, The Electricity Journal, May, 2013
- "Decoupling: Impact on the Risk and Cost of Common Equity of Public Utility Stocks", before the Society of Utility and Regulatory Financial Analysts: 45th Financial Forum, April 17-18, 2013, Indianapolis, IN

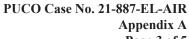
Recent Assignments

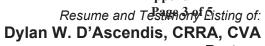
- Provided expert testimony on the cost of capital for ratemaking purposes before numerous state utility regulatory agencies
- Sponsored valuation testimony for a large municipal water company in front of an American Arbitration Association Board to justify the reasonability of their lease payments to the City
- Co-authored a valuation report on behalf of a large investor-owned utility company in response to a new state regulation which allowed the appraised value of acquired assets into rate base





Sponsor	Date	Case/Applicant	Docket No.	Subject
Regulatory Commission of Alaska				
Cook Inlet Natural Gas Storage		Cook Inlet Natural Gas Storage		
Alaska, LLC	07/21	Alaska, LLC	Docket No. TA45-733	Capital Structure
		Alaska Power Company; Goat	Tariff Nos. TA886-2; TA6-521;	
Alaska Power Company	09/20	Lake Hydro, Inc.; BBL Hydro, Inc.	TA4-573	Capital Structure
Alaska Power Company	07/16	Alaska Power Company	Docket No. TA857-2	Rate of Return
Alberta Utilities Commission				
AltaLink, L.P., and EPCOR		AltaLink, L.P., and EPCOR	2021 Generic Cost of Capital,	
Distribution & Transmission, Inc.	01/20	Distribution & Transmission, Inc.	Proceeding ID. 24110	Rate of Return
Arizona Corporation Commission				
	00/00		Docket No. WS-01303A-20-	D
EPCOR Water Arizona, Inc.	06/20	EPCOR Water Arizona, Inc.	0177	Rate of Return
Asimone Material Community	40/40	Arizona Water Company – Western	D1+ N W 044454 40 0070	Data of Datama
Arizona Water Company	12/19	Group	Docket No. W-01445A-19-0278	Rate of Return
Arizana Water Company	08/18	Arizona Water Company –	Dookst No. W 01445A 19 0164	Pote of Poture
Arizona Water Company Arkansas Public Service Commissi		Northern Group	Docket No. W-01445A-18-0164	Rate of Return
Arkansas Public Service Commissi	on			
Southwestern Electric Power Co.	07/21	Southwestern Electric Power Co.	Docket No. 21-070-U	Return on Equity
CenterPoint Energy Resources				
Corp.	05/21	CenterPoint Arkansas Gas	Docket No. 21-004-U	Return on Equity
Colorado Public Utilities Commissi	on			
Summit Utilities, Inc.	04/18	Colorado Natural Gas Company	Docket No. 18AL-0305G	Rate of Return
Atmos Energy Corporation	06/17	Atmos Energy Corporation	Docket No. 17AL-0429G	Rate of Return
Delaware Public Service Commissi	on			
Delmarva Power & Light Co.	11/20	Delmarva Power & Light Co.	Docket No. 20-0149 (Electric)	Return on Equity
Delmarva Power & Light Co.	10/20	Delmarva Power & Light Co.	Docket No. 20-0150 (Gas)	Return on Equity
Tidewater Utilities, Inc.	11/13	Tidewater Utilities, Inc.	Docket No. 13-466	Capital Structure
Public Service Commission of the L	District of	Columbia		
Washington Gas Light Company	09/20	Washington Gas Light Company	Formal Case No. 1162	Rate of Return
Federal Energy Regulatory Commis		9 9 1 7		
LS Power Grid California, LLC	10/20	LS Power Grid California, LLC	Docket No. ER21-195-000	Rate of Return
Florida Public Service Commission				
Tampa Electric Company	04/21	Tampa Electric Company	Docket No. 20210034-EI	Return on Equity
Peoples Gas System	09/20	Peoples Gas System	Docket No. 20200051-GU	Rate of Return
Utilities, Inc. of Florida	06/20	Utilities, Inc. of Florida	Docket No. 20200139-WS	Rate of Return
Hawaii Public Utilities Commission		Othitios, inc. or Florida	DOCKET 140. 20200 103-440	rate of retain
Trawaii Fubric Otilities Commission		Launiupoko Irrigation Company,	Docket No. 2020-0217 /	
Launiupoko Irrigation Company, Inc.	12/20	Inc.	Transferred to 2020-0089	Capital Structure
Lauriapono irrigation company, me.	12/20		114110101104 to 2020 0000	Cost of Service / Rate
Lanai Water Company, Inc.	12/19	Lanai Water Company, Inc.	Docket No. 2019-0386	Design
, , , , , , , , , , , , , , , , , , , ,		, , , , , , , , , , , , , , , , , , , ,		Cost of Service /
Manele Water Resources, LLC	08/19	Manele Water Resources, LLC	Docket No. 2019-0311	Rate Design
Kaupulehu Water Company	02/18	Kaupulehu Water Company	Docket No. 2016-0363	Rate of Return
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Cost of Service /
Aqua Engineers, LLC	05/17	Puhi Sewer & Water Company	Docket No. 2017-0118	Rate Design
				Cost of Service /
Hawaii Resources, Inc.	09/16	Laie Water Company	Docket No. 2016-0229	Rate Design

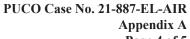


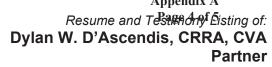


Partner



MANAGEMENT CONSULTANTS				
Sponsor	Date	Case/Applicant	Docket No.	Subject
Illinois Commerce Commission				
Utility Services of Illinois, Inc.	02/21	Utility Services of Illinois, Inc.	Docket No. 21-0198	Rate of Return
Ameren Illinois Company d/b/a		Ameren Illinois Company d/b/a		
Ameren Illinois	07/20	Ameren Illinois	Docket No. 20-0308	Return on Equity
110277 0 : (1111 : 1	44/47	11000	D 1 (N 47 4400	Cost of Service / Rate
Utility Services of Illinois, Inc.	11/17	Utility Services of Illinois, Inc.	Docket No. 17-1106	Design
Aqua Illinois, Inc.	04/17	Aqua Illinois, Inc.	Docket No. 17-0259	Rate of Return
Utility Services of Illinois, Inc.	04/15	Utility Services of Illinois, Inc.	Docket No. 14-0741	Rate of Return
Indiana Utility Regulatory Commis	sion	I		
Aqua Indiana, Inc.	03/16	Aqua Indiana, Inc. Aboite Wastewater Division	Docket No. 44752	Rate of Return
Twin Lakes, Utilities, Inc.	08/13	Twin Lakes, Utilities, Inc.	Docket No. 44752 Docket No. 44388	Rate of Return
Kansas Corporation Commission	00/13	TWIT Lakes, Othlites, ITC.	DOCKEL NO. 44300	Rate of Return
Atmos Energy	07/19	Atmos Energy	19-ATMG-525-RTS	Rate of Return
Kentucky Public Service Commiss		Attios Ellergy	13-A1100-323-1113	Nate of Neturn
Atmos Energy Corporation	07/21	Atmos Energy Corporation	2021-00304	PRP Rider Rate
Atmos Energy Corporation	06/21	Atmos Energy Corporation	2021-00304	Rate of Return
Duke Energy Kentucky, Inc.	06/21	Duke Energy Kentucky, Inc.	2021-00214	Return on Equity
Bluegrass Water Utility Operating	00/21	Bluegrass Water Utility Operating	2021-00190	Return on Equity
Company	10/20	Company	2020-00290	Return on Equity
Louisiana Public Service Commiss		Company		1
Utilities, Inc. of Louisiana	05/21	Utilities, Inc. of Louisiana	Docket No. U-36003	Rate of Return
Southwestern Electric Power	00,21	Southwestern Electric Power		
Company	12/20	Company	Docket No. U-35441	Return on Equity
Atmos Energy	04/20	Atmos Energy	Docket No. U-35535	Rate of Return
Louisiana Water Service, Inc.	06/13	Louisiana Water Service, Inc.	Docket No. U-32848	Rate of Return
Maine Public Utilities Commission				
The Maine Water Company	09/21	The Maine Water Company	Docket No. 2021-00053	Rate of Return
Maryland Public Service Commiss	ion			
Washington Gas Light Company	08/20	Washington Gas Light Company	Case No. 9651	Rate of Return
FirstEnergy, Inc.	08/18	Potomac Edison Company	Case No. 9490	Rate of Return
Massachusetts Department of Pub	lic Utilities			
		Fitchburg Gas & Electric Co.		
Unitil Corporation	12/19	(Elec.)	D.P.U. 19-130	Rate of Return
Unitil Corporation	12/19	Fitchburg Gas & Electric Co. (Gas)	D.P.U. 19-131	Rate of Return
		Liberty Utilities d/b/a New England		
Liberty Utilities	07/15	Natural Gas Company	Docket No. 15-75	Rate of Return
Minnesota Public Utilities Commis	sion	T.		
Northern States Dower Correction	11/00	Northorn States Daws Commercial	Docket No. 5000/00 00 700	Poto of Poture
Northern States Power Company	11/20	Northern States Power Company	Docket No. E002/GR-20-723	Rate of Return
Mississippi Public Service Commis		Atmos Energy	Dooket No. 2015 LIN 040	Conital Characteris
Atmos Energy	03/19	Atmos Energy	Docket No. 2015-UN-049	Capital Structure
Atmos Energy	07/18	Atmos Energy	Docket No. 2015-UN-049	Capital Structure
Missouri Public Service Commissi	1	0	0 N 0 D 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
Spire Missouri, Inc.	12/20	Spire Missouri, Inc.	Case No. GR-2021-0108	Return on Equity
Indian Hills Utility Operating	10/17	Indian Hills Utility Operating	Cons No. CD 2017 0250	Poto of Poture
Company, Inc.	10/17	Company, Inc.	Case No. SR-2017-0259	Rate of Return







Sponsor	Date	Case/Applicant	Docket No.	Subject
Raccoon Creek Utility Operating		Raccoon Creek Utility Operating		
Company, Inc.	09/16	Company, Inc.	Docket No. SR-2016-0202	Rate of Return
Public Utilities Commission of New	vada			
Southwest Gas Corporation	09/21	Southwest Gas Corporation	Docket No. 21-09001	Return on Equity
Southwest Gas Corporation	08/20	Southwest Gas Corporation	Docket No. 20-02023	Return on Equity
New Hampshire Public Utilities Co	mmission			
Aquarion Water Company of New		Aquarion Water Company of New		
Hampshire, Inc.	12/20	Hampshire, Inc.	Docket No. DW 20-184	Rate of Return
New Jersey Board of Public Utilitie	_			T
Middlesex Water Company	05/21	Middlesex Water Company	Docket No. WR21050813	Rate of Return
Atlantic City Electric Company	12/20	Atlantic City Electric Company	Docket No. ER20120746	Return on Equity
FirstEnergy	02/20	Jersey Central Power & Light Co.	Docket No. ER20020146	Rate of Return
Aqua New Jersey, Inc.	12/18	Aqua New Jersey, Inc.	Docket No. WR18121351	Rate of Return
Middlesex Water Company	10/17	Middlesex Water Company	Docket No. WR17101049	Rate of Return
Middlesex Water Company	03/15	Middlesex Water Company	Docket No. WR15030391	Rate of Return
The Atlantic City Sewerage		The Atlantic City Sewerage		Cost of Service /
Company	10/14	Company	Docket No. WR14101263	Rate Design
Middlesex Water Company	11/13	Middlesex Water Company	Docket No. WR1311059	Capital Structure
New Mexico Public Regulation Co.	mmission			
Southwestern Public Service	04/04	Southwestern Public Service	0 N 00 00000 UT	.
Company	01/21	Company	Case No. 20-00238-UT	Return on Equity
North Carolina Utilities Commission	_		I	T =
Carolina Water Service, Inc.	07/21	Carolina Water Service, Inc.	Docket No. W-354 Sub 384	Rate of Return
Piedmont Natural Gas Co., Inc.	03/21	Piedmont Natural Gas Co., Inc.	Docket No. G-9, Sub 781	Return on Equity
Duke Energy Carolinas, LLC	07/20	Duke Energy Carolinas, LLC	Docket No. E-7, Sub 1214	Return on Equity
Duke Energy Progress, LLC	07/20	Duke Energy Progress, LLC	Docket No. E-2, Sub 1219	Return on Equity
Aqua North Carolina, Inc.	12/19	Aqua North Carolina, Inc.	Docket No. W-218 Sub 526	Rate of Return
Carolina Water Service, Inc.	06/19	Carolina Water Service, Inc.	Docket No. W-354 Sub 364	Rate of Return
Carolina Water Service, Inc.	09/18	Carolina Water Service, Inc.	Docket No. W-354 Sub 360	Rate of Return
Aqua North Carolina, Inc.	07/18	Aqua North Carolina, Inc.	Docket No. W-218 Sub 497	Rate of Return
North Dakota Public Service Com	mission			
Northern States Power Company	11/20	Northern States Power Company	Case No. PU-20-441	Rate of Return
Public Utilities Commission of Oh	io			
Aqua Ohio, Inc.	07/21	Aqua Ohio, Inc.	Docket No. 21-0595-WW-AIR	Rate of Return
Aqua Ohio, Inc.	05/16	Aqua Ohio, Inc.	Docket No. 16-0907-WW-AIR	Rate of Return
Pennsylvania Public Utility Comm	ission			<u>'</u>
Community Utilities of Pennsylvania,		Community Utilities of		
Inc.	04/21	Pennsylvania, Inc.	Docket No. R-2021-3025207	Rate of Return
Vicinity Energy Philadelphia, Inc.	04/21	Vicinity Energy Philadelphia, Inc.	Docket No. R-2021-3024060	Rate of Return
Delaware County Regional Water		Delaware County Regional Water		
Control Authority	02/20	Control Authority	Docket No. A-2019-3015173	Valuation
Valley Energy, Inc.	07/19	C&T Enterprises	Docket No. R-2019-3008209	Rate of Return
Wellsboro Electric Company	07/19	C&T Enterprises	Docket No. R-2019-3008208	Rate of Return
Citizens' Electric Company of				
Lewisburg	07/19	C&T Enterprises	Docket No. R-2019-3008212	Rate of Return
Steelton Borough Authority	01/19	Steelton Borough Authority	Docket No. A-2019-3006880	Valuation
Mahoning Township, PA	08/18	Mahoning Township, PA	Docket No. A-2018-3003519	Valuation



PUCO Case No. 21-887-EL-AIR Appendix A

Resume and Testino of: Dylan W. D'Ascendis, CRRA, CVA Partner

Sponsor	Date	Case/Applicant	Docket No.	Subject
SUEZ Water Pennsylvania Inc.	04/18	SUEZ Water Pennsylvania Inc.	Docket No. R-2018-000834	Rate of Return
Columbia Water Company	09/17	Columbia Water Company	Docket No. R-2017-2598203	Rate of Return
Veolia Energy Philadelphia, Inc.	06/17	Veolia Energy Philadelphia, Inc.	Docket No. R-2017-2593142	Rate of Return
Emporium Water Company	07/14	Emporium Water Company	Docket No. R-2014-2402324	Rate of Return
Columbia Water Company	07/13	Columbia Water Company	Docket No. R-2013-2360798	Rate of Return
Penn Estates Utilities, Inc.	12/11	Penn Estates, Utilities, Inc.	Docket No. R-2011-2255159	Capital Structure / Long-Term Debt Cost Rate
South Carolina Public Service Com	mission			
Blue Granite Water Co.	12/19	Blue Granite Water Company	Docket No. 2019-292-WS	Rate of Return
Carolina Water Service, Inc.	02/18	Carolina Water Service, Inc.	Docket No. 2017-292-WS	Rate of Return
Carolina Water Service, Inc.	06/15	Carolina Water Service, Inc.	Docket No. 2015-199-WS	Rate of Return
Carolina Water Service, Inc.	11/13	Carolina Water Service, Inc.	Docket No. 2013-275-WS	Rate of Return
United Utility Companies, Inc.	09/13	United Utility Companies, Inc.	Docket No. 2013-199-WS	Rate of Return
Utility Services of South Carolina, Inc.	09/13	Utility Services of South Carolina, Inc.	Docket No. 2013-201-WS	Rate of Return
Tega Cay Water Services, Inc.	11/12	Tega Cay Water Services, Inc.	Docket No. 2012-177-WS	Capital Structure
Tennessee Public Utility Commission	on			
Piedmont Natural Gas Company	07/20	Piedmont Natural Gas Company	Docket No. 20-00086	Return on Equity
Public Utility Commission of Texas				
Southwestern Public Service Company	02/21	Southwestern Public Service Company	Docket No. 51802	Return on Equity
Southwestern Electric Power Company	10/20	Southwestern Electric Power Company	Docket No. 51415	Rate of Return
Virginia State Corporation Commiss	sion			
Virginia Natural Gas, Inc.	04/21	Virginia Natural Gas, Inc.	PUR-2020-00095	Return on Equity
Massanutten Public Service Corporation	12/20	Massanutten Public Service Corporation	PUE-2020-00039	Return on Equity
Aqua Virginia, Inc.	07/20	Aqua Virginia, Inc.	PUR-2020-00106	Rate of Return
WGL Holdings, Inc.	07/18	Washington Gas Light Company	PUR-2018-00080	Rate of Return
Atmos Energy Corporation	05/18	Atmos Energy Corporation	PUR-2018-00014	Rate of Return
Aqua Virginia, Inc.	07/17	Aqua Virginia, Inc.	PUR-2017-00082	Rate of Return
Massanutten Public Service Corp.	08/14	Massanutten Public Service Corp.	PUE-2014-00035	Rate of Return / Rate Design

PUCO Case No. 21-887-EL-AIR Attachment DWD-1 Page Page 1 of 2

<u>Duke Energy Ohio, Inc.</u> Recommended Capital Structure and Cost Rates for Ratemaking Purposes <u>at August 31, 2021</u>

Type Of Capital	Ratios (1)	Cost Rate	Weighted Cost Rate
Long-Term Debt Common Equity	49.50% 50.50%	4.16% (1) 10.30% (2)	2.06% 5.20%
Total	100.00%		7.26%

Notes:

- (1) Company-provided.
- (2) From page 2 of this Attachment.

<u>Duke Energy Ohio, Inc.</u> <u>Brief Summary of Common Equity Cost Rate</u>

Line No.		Principal Methods	Proxy Group of Fourteen Electric Companies			
1.	-	Discounted Cash Flow Model (DCF) (1)	8.86%			
2.		Risk Premium Model (RPM) (2)	10.78%			
3.		Capital Asset Pricing Model (CAPM) (3)	12.52%			
4.		Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	12.58%			
5.		Indicated Range of Common Equity Cost Rates before Adjustment for Company-Specific Risk	9.72% - 11.72%			
6.		Size Risk Adjustment (5)	0.15%			
7.		Credit Risk Adjustment (6)	0.08%			
8.		Flotation Cost Adjustment (7)	0.11%			
9.		Indicated Range of Common Equity Cost Rates after Adjustment	10.06% - 12.06%			
10.		Recommended Common Equity Cost Rate	10.30%			
Notes:	(1) (2) (3) (4) (5)	From page 1 of Attachment DWD-2. From page 1 of Attachment DWD-3. From page 1 of Attachment DWD-4. From page 1 of Attachment DWD-6. Adjustment to reflect the Company's greater business risk due to to the Utility Proxy Group as detailed in Mr. D'Ascendis' direct tes Company-specific risk adjustment to reflect Duke Ohio's greater	stimony.			

the Utility Proxy Group as detailed in Mr. D'Ascendis' direct testimony.

(7) From page 1 of Attachment DWD-8.

Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the

Proxy Group of Fourteen Electric Companies

[9]

2

[4]

[3]

[2]

[]

Indicated Common Equity Cost Rate (5)	8.21 %	9.85	9.84	8.13	6:39	9.91	9.44	6.51	8.15	8.89	10.08	7.47	11.73	8.89	8.82 %	8.89 %	8.86 %
Adjusted Dividend Yield (4)	2.81 %	2.68	3.92	4.73	3.64	3.41	2.91	2.81	4.05	4.76	3.18	4.10	3.66	2.76	Average	Median	Average of Mean and Median
Average Projected Five Year Growth in EPS (3)	5.40 %	7.17	5.92	3.40	2.75	6.50	6.53	3.70	4.10	4.13	6.90	3.37	8.07	6.13			Average of M
Yahoo! Finance Projected Five Year Growth in EPS	5.10 %	7.70	5.45	3.40	3.85	5.70	89.9	3.20	4.50	3.90	9.00	0.10	7.10	6.30			
Zack's Five Year Projected Growth Rate in EPS	8.60 %	7.30	5.30	3.40	1.40	5.80	6.40	3.90	4.80	4.50	4.70	2.00	8.60	6.10			
Value Line Projected Five Year Growth in EPS (2)	5.50 %	6.50	7.00	NMF	3.00	8.00	6.50	4.00	3.00	4.00	7.00	2.00	8.50	00.9			
Average Dividend Yield (1)	2.74 %	2.59	3.81	4.65	3.59	3.30	2.82	2.76	3.97	4.66	3.07	4.03	3.52	2.68			
Proxy Group of Fourteen Electric Companies	Alliant Energy Corporation	Ameren Corporation	Duke Energy Corporation	Edison International	Entergy Corporation	Evergy, Inc.	Eversource Energy	IDACORP, Inc.	NorthWestern Corporation	OGE Energy Corporation	Otter Tail Corporation	Pinnacle West Capital Corporation	Portland General Electric Company	Xcel Energy, Inc.			

Notes:

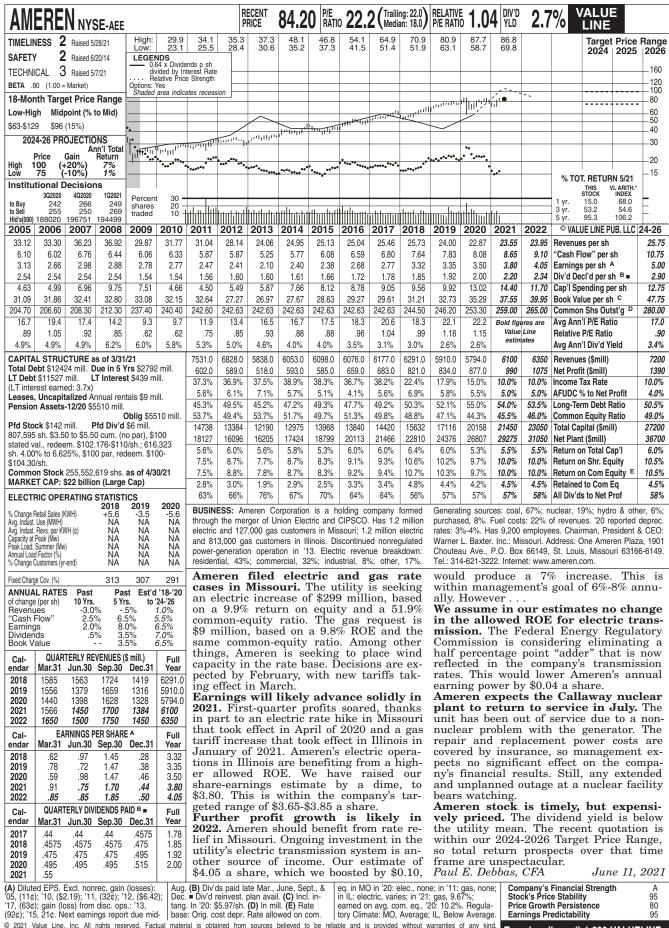
(1) Indicated dividend at 08/31/2021 divided by the average closing price of the last 60 trading days ending 08/31/2021 for each company.

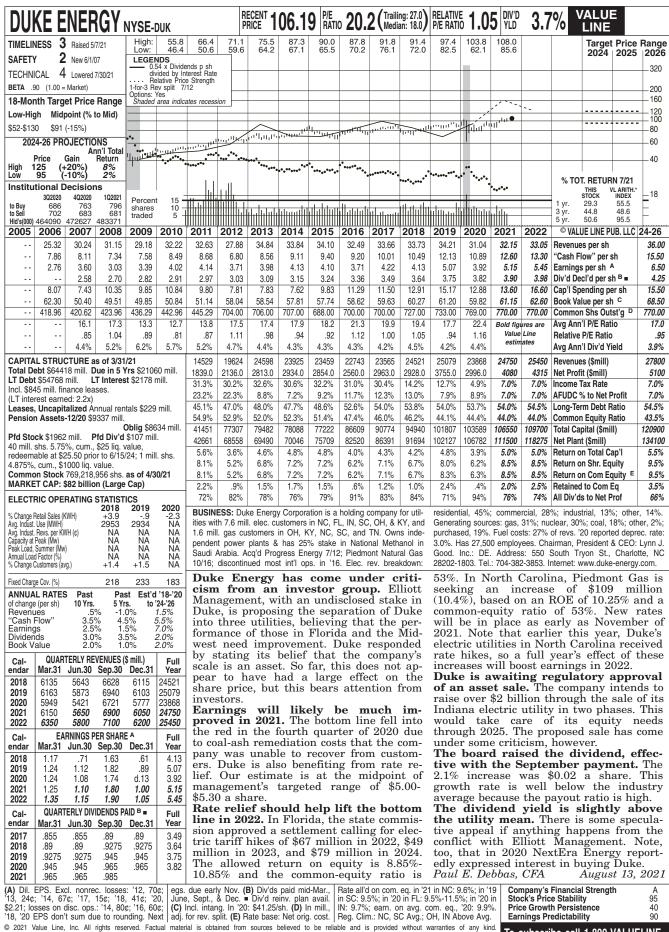
(2) From pages 2 through 15 of this Attachment.
(3) Average of columns 2 through 4 excluding negative growth rates.
(4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 5) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for Alliant Energy Corporation, 2.74% x (1+(1/2 x 5.40%)) = 2.81%.

(5) Column 5 + Column 6.

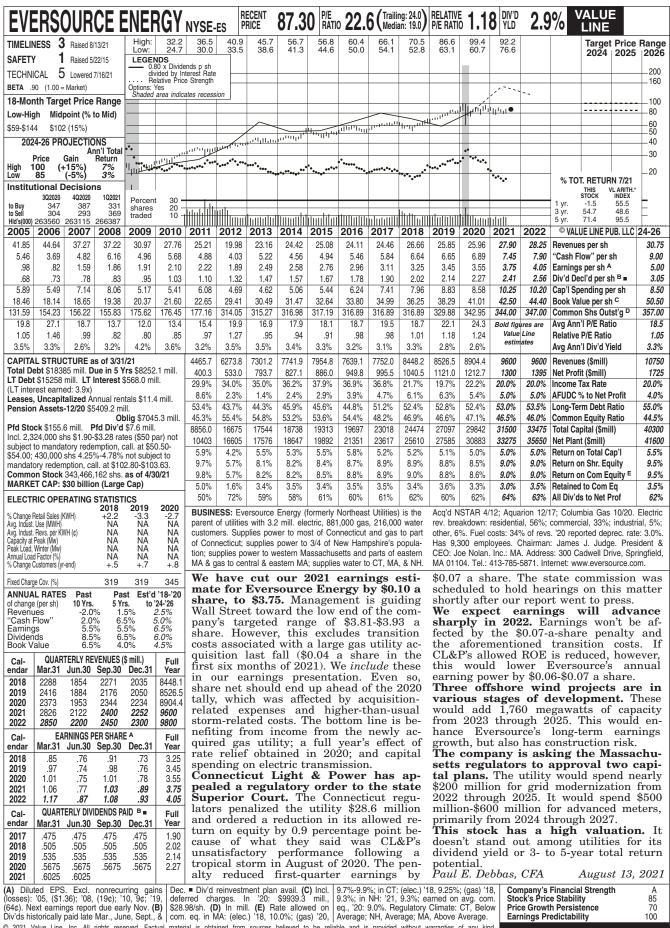
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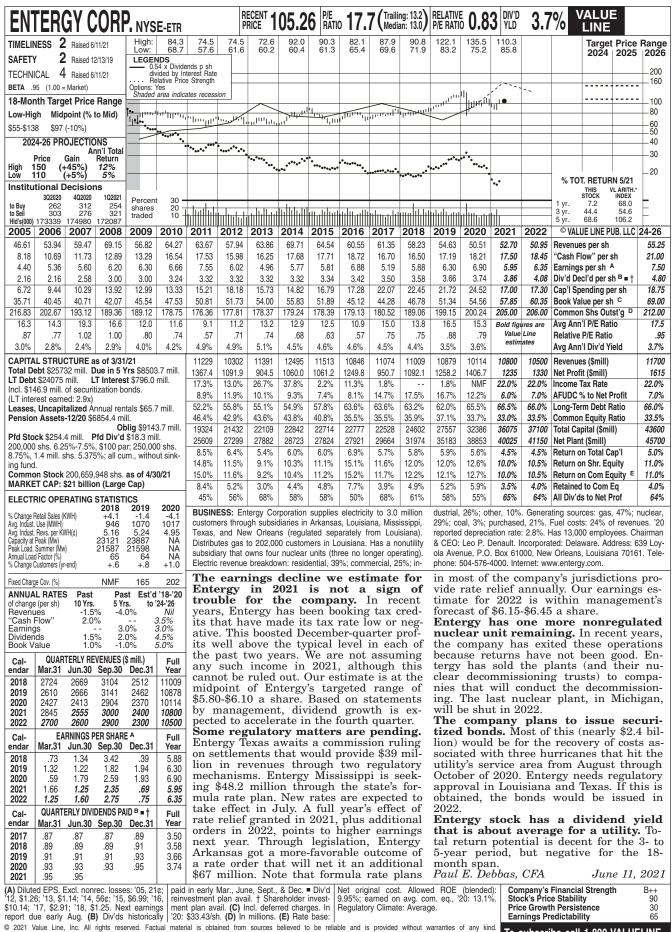
www.yahoo.com Downloaded on 08/31/2021 Bloomberg Professional Services www.zacks.com Downloaded on 08/31/2021 Value Line Investment Survey

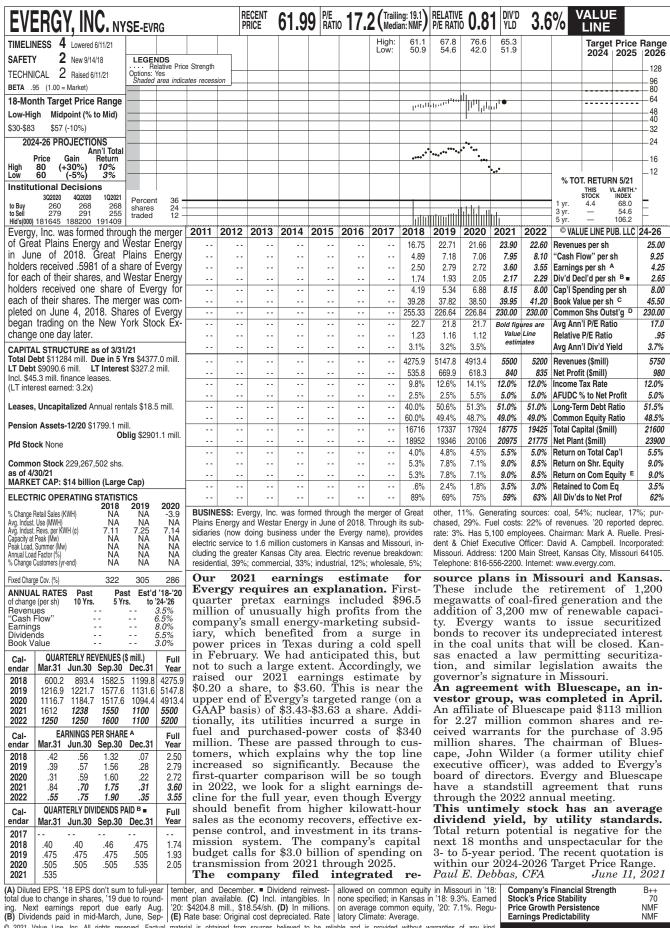


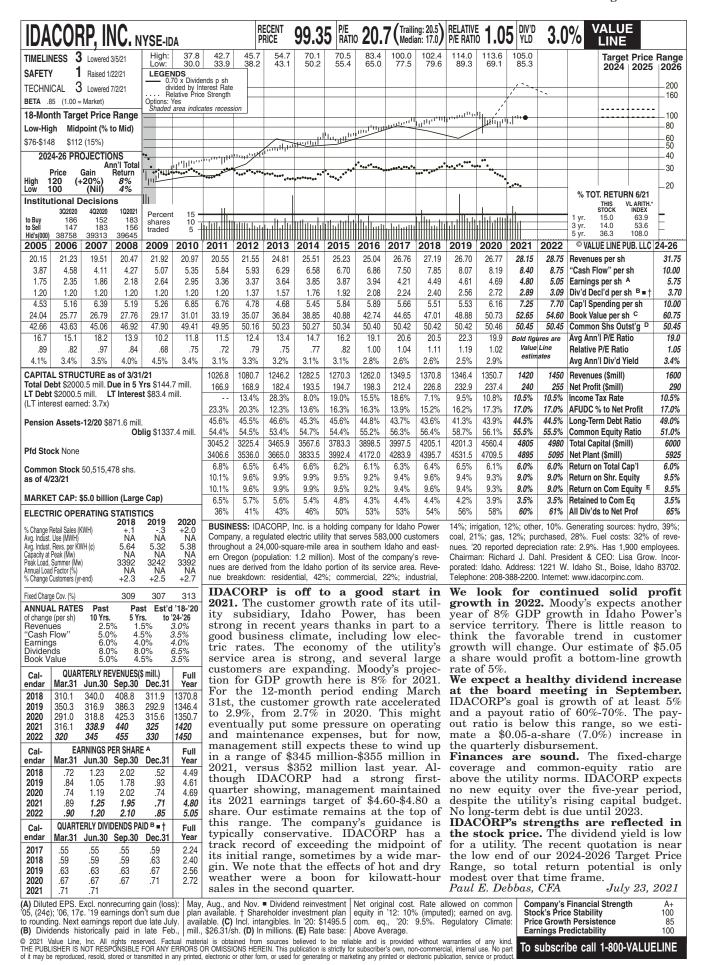


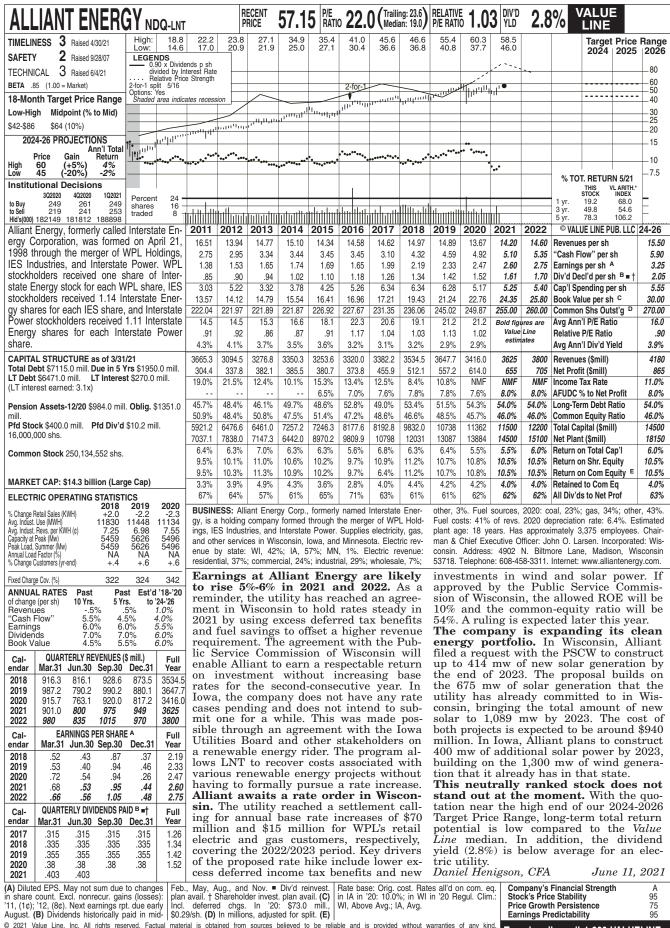


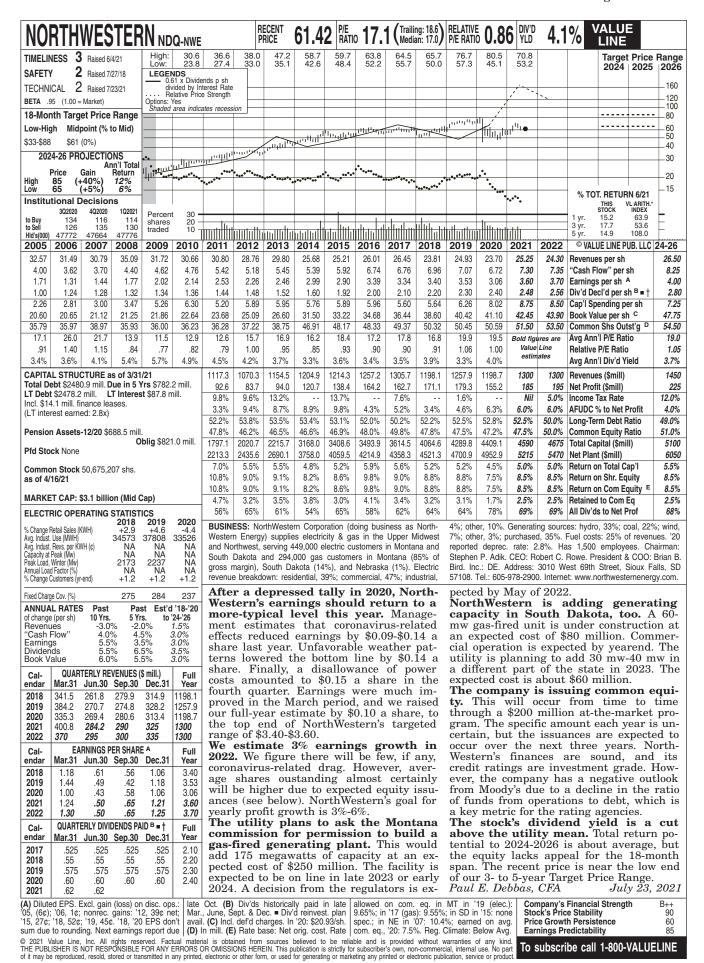


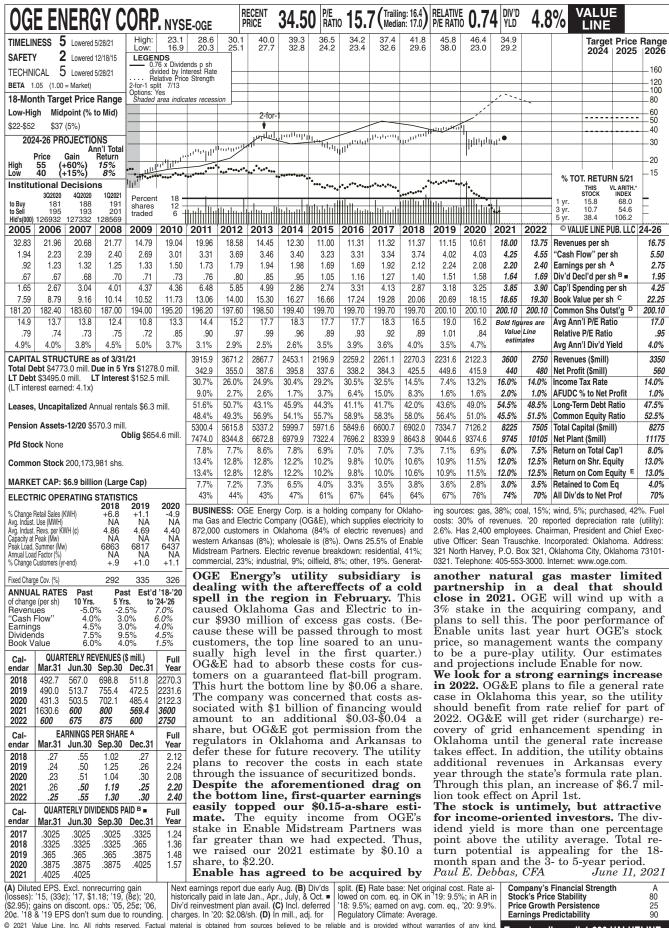


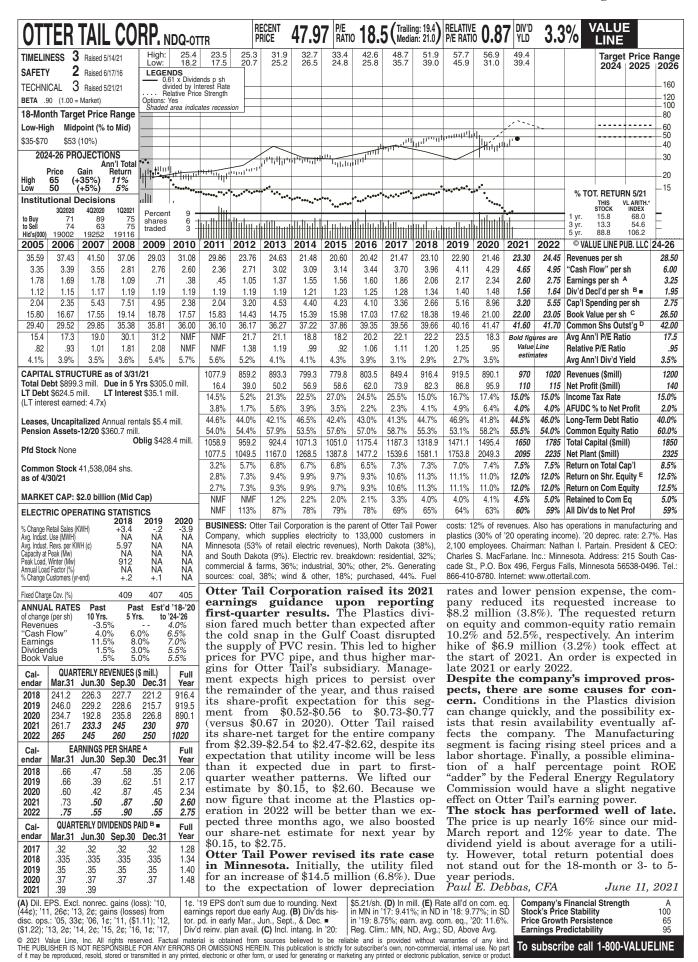


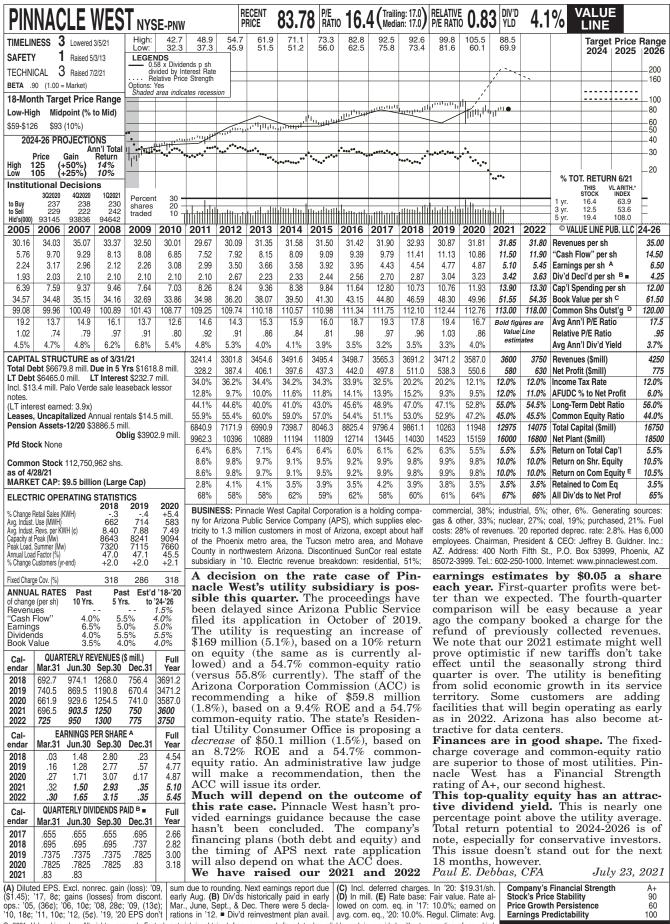


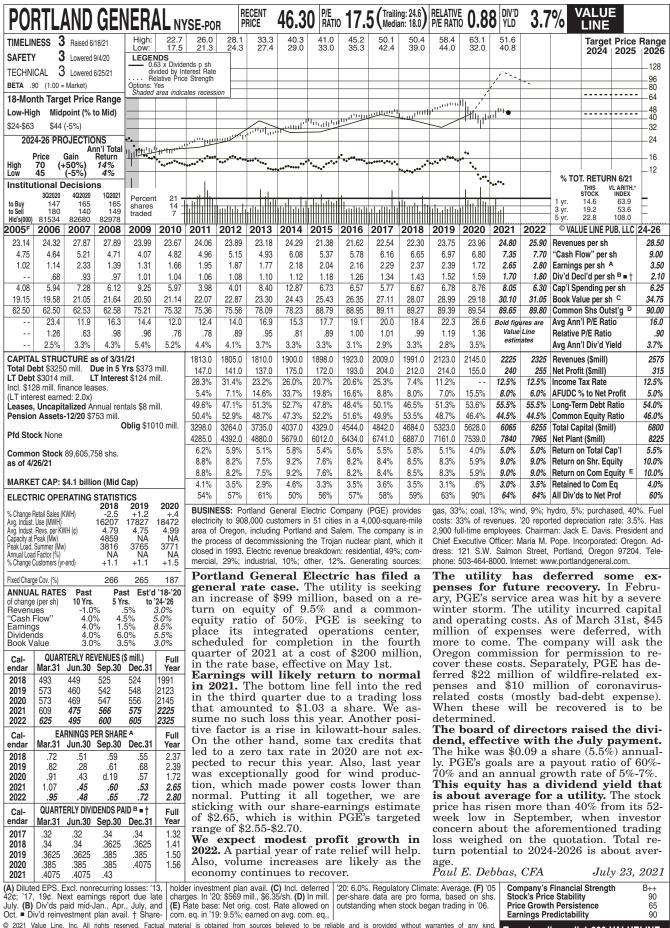


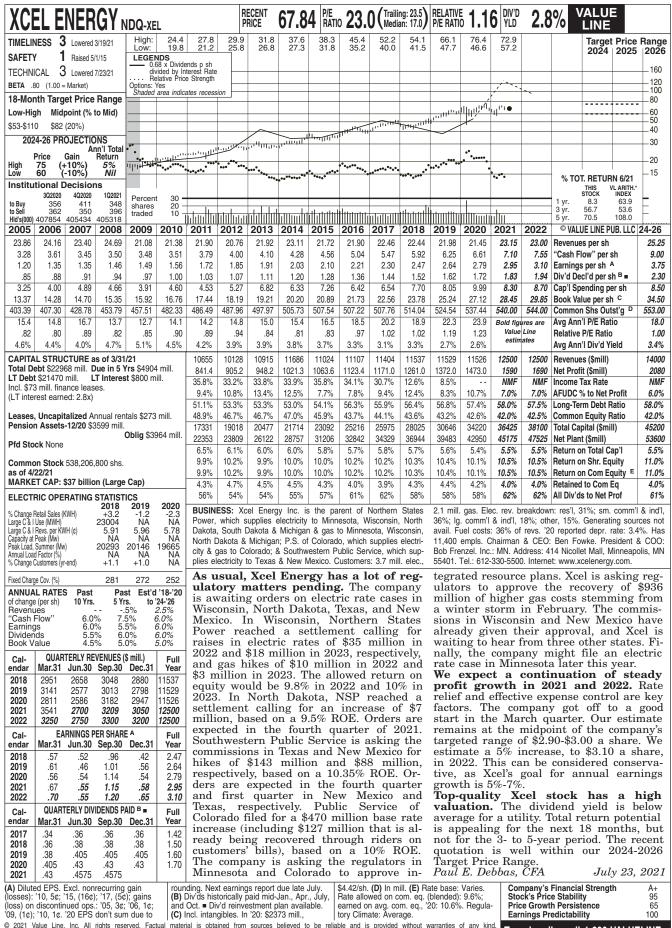












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<u>Duke Energy Ohio, Inc.</u> Summary of Risk Premium Models for the <u>Proxy Group of Fourteen Electric Companies</u>

		Proxy Group of Fourteen Electric Companies			
Predictive Risk Premium Model (PRPM) (1)		10.88	%		
Risk Premium Using an Adjusted Total Market Approach (2)		10.68	_%		
	Average	10.78	_%		

Notes:

- (1) From page 2 of this Attachment.
- (2) From page 3 of this Attachment.

Duke Energy Ohio, Inc. Indicated ROE Derived by the Predictive Risk Premium Model (1)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Fourteen Electric Companies	LT Average Predicted Variance	Spot Predicted Variance	Recommended Variance (2)	GARCH Coefficient	Predicted Risk Premium (3)	Risk-Free Rate (4)	Indicated ROE (5)
Alliant Energy Corporation	0.27%	0.34%	0.31%	2.7403	10.59%	2.70%	13.29%
Ameren Corporation	0.23%	0.32%	0.28%	2.0383	6.98%	2.70%	9.68%
Duke Energy Corporation	0.31%	0.31%	0.31%	1.8669	7.19%	2.70%	9.89%
Edison International	0.43%	0.49%	0.46%	1.4734	8.44%	2.70%	11.14%
Entergy Corporation	0.40%	0.51%	0.46%	2.2355	13.00%	2.70%	15.70%
Evergy, Inc.	0.36%	0.37%	0.36%	1.5092	6.78%	2.70%	9.48%
Eversource Energy	0.31%	0.30%	0.30%	1.6900	6.35%	2.70%	9.05%
IDACORP, Inc.	0.29%	0.41%	0.35%	2.2119	9.61%	2.70%	12.31%
NorthWestern Corporation	0.34%	0.26%	0.30%	2.3747	8.93%	2.70%	11.63%
OGE Energy Corporation	0.31%	0.24%	0.28%	2.1950	7.50%	2.70%	10.20%
Otter Tail Corporation	0.37%	0.26%	0.32%	1.7137	6.71%	2.70%	9.41%
Pinnacle West Capital Corporation	0.60%	0.34%	0.47%	1.2594	7.35%	2.70%	10.05%
Portland General Electric Company	0.28%	0.34%	0.31%	2.1651	8.28%	2.70%	10.98%
Xcel Energy, Inc.	0.28%	0.34%	0.31%	2.8250	10.91%	2.70%	13.61%
						Average	11.17%
						Median	10.59%
					Average of Mea	n and Median	10.88%

Notes:

- The Predictive Risk Premium Model uses historical data to generate a predicted variance and a GARCH (1) coefficient. The historical data used are the equity risk premiums for the first available trading month as reported by Bloomberg Professional Service.
- Average of Columns [1] and [2].
- $(1+(\text{Column } [3] * \text{Column } [4])^{^{1}2})$ 1. From note 2 on page 2 of Attachment DWD-4. (4)
- (5) Column [5] + Column [6].

<u>Duke Energy Ohio, Inc.</u> Indicated Common Equity Cost Rate Through Use of a Risk Premium Model <u>Using an Adjusted Total Market Approach</u>

<u>Line No.</u>			Proxy Group Fourteen Elec Companie	ctric		
1.		Prospective Yield on Aaa Rated Corporate Bonds (1)	3.41	%		
2.		Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A2 Rated Public				
		Utility Bonds	0.38	(2)		
3.		Adjusted Prospective Yield on A2 Rated Public Utility Bonds	3.79	%		
4.		Adjustment to Reflect Bond Rating Difference of Proxy Group	0.08	(3)		
5.		Adjusted Prospective Bond Yield	3.87	%		
6.		Equity Risk Premium (4)	6.81	-		
7.		Risk Premium Derived Common Equity Cost Rate	10.68	<u></u> %		
Notes:	(1)	Consensus forecast of Moody's Aaa Rated Corpor Chip Financial Forecasts (see pages 10 and 11 of				
	(2)	The average yield spread of A2 rated public utility rated corporate bonds of 0.38% from page 4 of the		ıa		
(3) Adjustment to reflect the A3 Moody's LT issuer rating of the Uti Proxy Group as shown on page 5 of this Attachment. The 0.08% upward adjustment is derived by taking 1/3 of the spread betw A2 and Baa2 Public Utility Bonds (1/3 * 0.25% = 0.08%) as derifted page 4 of this Attachment.						

(4) From page 7 of this Attachment.

[3]

3.19 %

3.20

<u>Duke Energy Ohio, Inc.</u> Interest Rates and Bond Spreads for <u>Moody's Corporate and Public Utility Bonds</u>

Selected Bond Yields

Aaa Rated	A2 Rated Public	Baa2 Rated Public
Corporate Bond	Utility Bond	Utility Bond

[2]

2.95 %

2.95

Jun-2021	2.79	3.16	3.41
Average	2.64 %	3.02 %	3.27 %

Selected Bond Spreads

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:

[1]

2.55 %

2.57

0.38 % (1)

Baa2 Rated Public Utility Bonds Over A2 Rated Public Utility Bonds:

0.25 % (2)

Notes:

Aug-2021

Jul-2021

- (1) Column [2] Column [1].
- (2) Column [3] Column [2].

Source of Information:

Bloomberg Professional Service

<u>Duke Energy Ohio, Inc.</u> Comparison of Long-Term Issuer Ratings for <u>Proxy Group of Fourteen Electric Companies</u>

Moody's	Standard & Poor's
Long-Term Issuer Rating	Long-Term Issuer Rating
August 2021	August 2021

Proxy Group of Fourteen Electric Companies	Long-Term Issuer Rating (1)	Numerical Weighting (2)	Long-Term Issuer Rating (1)	Numerical Weighting (2)
Alliant Energy Corporation	A3/Baa1	7.5	A/A-	6.5
Ameren Corporation	A3	7.0	BBB+	8.0
Duke Energy Corporation	A3	7.0	BBB+	8.0
Edison International	Baa2	9.0	BBB	9.0
Entergy Corporation	Baa1/Baa2	8.5	BBB+	8.0
Evergy, Inc.	Baa1	8.0	A-	7.0
Eversource Energy	A3	7.0	A-	7.0
IDACORP, Inc.	A3	7.0	BBB	9.0
NorthWestern Corporation	Baa2	9.0	BBB	9.0
OGE Energy Corporation	A3	7.0	A-	7.0
Otter Tail Corporation	A3	7.0	BBB+	8.0
Pinnacle West Capital Corporation	A2	6.0	A-	7.0
Portland General Electric Company	A3	7.0	BBB+	8.0
Xcel Energy, Inc.	A3	7.0	A-	7.0
Average	A3	7.4	BBB+	7.8

Notes:

- (1) Ratings are that of the average of each company's utility operating subsidiaries.
- (2) From page 6 of this Attachment.

Source Information: Moody's Investors Service

Standard & Poor's Global Utilities Rating Service

Numerical Assignment for Moody's and Standard & Poor's Bond Ratings

Moody's Bond Rating	Numerical Bond Weighting	Standard & Poor's Bond Rating
Aaa	1	AAA
A 4	2	
Aa1	2	AA+
Aa2	3	AA
Aa3	4	AA-
A1	5	A+
A2	6	A
A3	7	A-
Baa1	8	BBB+
Baa2	9	BBB
Baa3	10	BBB-
D 4	44	22
Ba1	11	BB+
Ba2	12	BB
Ba3	13	BB-
B1	14	B+
B2	15	В
В3	16	В-

<u>Duke Energy Ohio, Inc.</u> Judgment of Equity Risk Premium for <u>Proxy Group of Fourteen Electric Companies</u>

Line No.	_	Proxy Group of Fourteen Electric Companies
1.	Calculated equity risk premium based on the total market using the beta approach (1)	9.01 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A2 rated bonds (2)	5.62
3.	Predicted Equity Risk Premium Based on Regression Analysis of 1,183 Fully-Litigated Electric Utility Rate Cases	5.81
4.	Average equity risk premium	6.81 %
Notes:	(1) From page 8 of this Attachment.(2) From page 12 of this Attachment.	

(3) From page 13 of this Attachment.

<u>Duke Energy Ohio, Inc.</u> Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for the <u>Proxy Group of Fourteen Electric Companies</u>

Line No.	Equity Risk Premium Measure	Proxy Group of Fourteen Electric Companies
<u>]</u>	(bbotson-Based Equity Risk Premiums:	
1.	Ibbotson Equity Risk Premium (1)	5.92 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.87
3.	Ibbotson Equity Risk Premium based on PRPM (3)	7.88
4.	Equity Risk Premium Based on Value Line Summary and Index (4)	5.54
5.	Equity Risk Premium Based on Value Line S&P 500 Companies (5)	11.64
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	14.76
7.	Conclusion of Equity Risk Premium	9.10 %
8.	Adjusted Beta (7)	0.99
9.	Forecasted Equity Risk Premium	9.01 %

Notes provided on page 9 of this Attachment.

Duke Energy Ohio, Inc.

Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for the

Proxy Group of Fourteen Electric Companies

Notes:

- (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2021 Market Report minus the arithmetic mean monthly yield of Moody's average Aaa and Aa2 corporate bonds from 1928-2020.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of large company common stocks relative to Moody's average Aaa and Aa2 rated corporate bond yields from 1928-2020 referenced in Note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is discussed in the accompanying direct testimony. The Ibbotson equity risk premium based on the PRPM is derived by applying the PRPM to the monthly risk premiums between Ibbotson large company common stock monthly returns and average Aaa and Aa2 corporate monthly bond yields, from Ianuary 1928 through August 2021.
- (4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the average consensus forecast of Aaa corporate bonds of 3.41% (from page 3 of this Attachment) from the projected 3-5 year total annual market return of 8.95% (described fully in note 1 on page 2 of Attachment DWD-4).
- (5) Using data from Value Line for the S&P 500, an expected total return of 15.05% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.41% results in an expected equity risk premium of 11.64%.
- (6) Using data from the Bloomberg Professional Service for the S&P 500, an expected total return of 18.17% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.41% results in an expected equity risk premium of 14.76%.
- (7) Average of mean and median beta from Attachment DWD-4.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2021 SBBI Yearbook, John Wiley & Sons, Inc. Industrial Manual and Mergent Bond Record Monthly Update.

Value Line Summary and Index

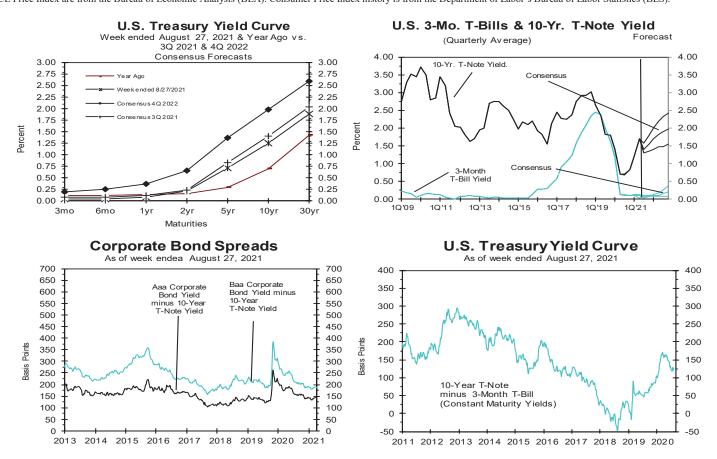
Blue Chip Financial Forecasts, September 1, 2021 and June 1, 2021

Bloomberg Professional Service

Consensus Forecasts of U.S. Interest Rates and Key Assumptions

	History						Cons	ensus l	Forecas	sts-Qua	arterly	Avg.		
	Av	erage For	Week End	ing	Ave	erage For	Month	Latest Qtr	3Q	4Q	1Q	2Q	3Q	4Q
Interest Rates	Aug 27	Aug 20	Aug 13	Aug 6	<u>Jul</u>	<u>Jun</u>	May	2Q 2021	<u>2021</u>	<u>2021</u>	<u>2022</u>	<u>2022</u>	<u>2022</u>	<u>2022</u>
Federal Funds Rate	0.09	0.10	0.10	0.09	0.10	0.08	0.06	0.07	0.1	0.1	0.1	0.1	0.1	0.1
Prime Rate	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.3	3.3	3.3	3.3	3.3	3.3
LIBOR, 3-mo.	0.12	0.13	0.12	0.12	0.13	0.13	0.15	0.16	0.2	0.2	0.2	0.3	0.3	0.3
Commercial Paper, 1-mo.	0.05	0.06	0.06	0.05	0.05	0.04	0.10	0.06	0.1	0.1	0.1	0.1	0.2	0.2
Treasury bill, 3-mo.	0.05	0.06	0.06	0.05	0.05	0.04	0.02	0.03	0.1	0.1	0.1	0.1	0.2	0.2
Treasury bill, 6-mo.	0.06	0.05	0.06	0.06	0.05	0.05	0.04	0.04	0.1	0.1	0.1	0.2	0.2	0.3
Treasury bill, 1 yr.	0.07	0.07	0.08	0.08	0.08	0.07	0.05	0.06	0.1	0.1	0.2	0.2	0.3	0.4
Treasury note, 2 yr.	0.23	0.22	0.23	0.19	0.22	0.20	0.16	0.17	0.2	0.3	0.4	0.5	0.5	0.6
Treasury note, 5 yr.	0.81	0.78	0.81	0.69	0.76	0.84	0.82	0.84	0.8	0.9	1.1	1.2	1.3	1.4
Treasury note, 10 yr.	1.31	1.26	1.34	1.22	1.32	1.52	1.62	1.59	1.4	1.6	1.7	1.8	1.9	2.0
Treasury note, 30 yr.	1.92	1.90	1.98	1.87	1.94	2.16	2.32	2.26	2.1	2.2	2.3	2.5	2.5	2.6
Corporate Aaa bond	2.72	2.70	2.79	2.67	2.72	2.91	3.06	3.00	2.7	2.9	3.0	3.1	3.2	3.3
Corporate Baa bond	3.17	3.15	3.23	3.11	3.17	3.35	3.52	3.46	3.4	3.7	3.9	4.0	4.1	4.2
State & Local bonds	2.64	2.65	2.65	2.63	2.60	2.64	2.64	2.65	2.3	2.5	2.5	2.6	2.7	2.7
Home mortgage rate	2.87	2.86	2.87	2.77	2.87	2.98	2.96	3.00	3.0	3.1	3.2	3.3	3.5	3.5
				Histor	y				Co	nsenst	ıs Fore	casts-(Quartei	:ly
	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q	1Q	2Q	3Q	4Q
Key Assumptions	2019	2019	<u>2020</u>	<u>2020</u>	2020	2020	2021	2021	2021	2021	2022	2022	2022	2022
Fed's AFE \$ Index	110.6	110.5	111.4	112.4	107.3	105.2	103.4	102.9	105.0	105.2	105.0	104.7	104.5	104.3
Real GDP	2.8	1.9	-5.1	-31.2	33.8	4.5	6.3	6.6	6.4	5.4	4.1	3.4	2.9	2.4
GDP Price Index	1.4	1.5	1.6	-1.5	3.6	2.2	4.3	6.1	4.2	2.8	2.4	2.3	2.4	2.3
Consumer Price Index	1.3	2.6	1.0	-3.1	4.7	2.4	3.7	8.4	5.5	2.4	2.2	2.3	2.4	2.2
PCE Price Index	1.1	1.7	1.3	-1.6	3.7	1.5	3.8	6.5	4.3	2.3	2.1	2.1	2.2	2.2

Forecasts for interest rates and the Federal Reserve's Major Currency Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index, PCE Price Index and Consumer Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data: Treasury rates from the Federal Reserve Board's H.15; AAA-AA and A-BBB corporate bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity; State and local bond yields from Bank of America-Merrill Lynch, A-rated, yield to maturity; Mortgage rates from Freddie Mac, 30-year, fixed; LIBOR quotes from Intercontinental Exchange. All interest rate data are sourced from Haver Analytics. Historical data for Fed's Major Currency Index are from FRSR H.10. Historical data for Real GDP, GDP Price Index and PCE Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index history is from the Department of Labor's Bureau of Labor Statistics (BLS).



Long-Range Survey:

The table below contains the results of our twice-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are consensus estimates for the years 2022 through 2027 and averages for the five-year periods 2023-2027 and 2028-2032. Apply these projections cautiously. Few if any economic, demographic and political forces can be evaluated accurately over such long time spans.

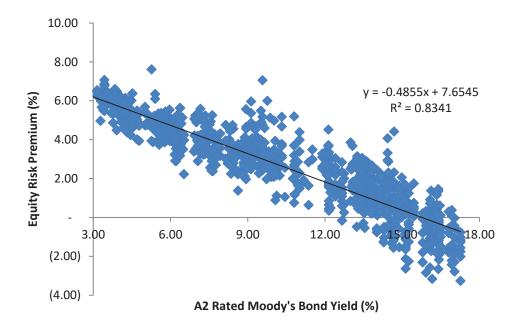
1 3	,	<i>O</i> 1	1	<i>U</i> 1	1				
					or The Year				r Averages
		2022	2023	2024	2025	2026	2027	2023-2027	2028-2032
1. Federal Funds Rate	CONSENSUS	0.1	0.4	1.0	1.6	1.9	2.1	1.4	2.2
	Top 10 Average	0.2	0.7	1.6	2.4	2.6	2.7	2.0	2.7
0.01	Bottom 10 Average	0.1	0.1	0.5	0.9	1.3	1.5	0.9	1.6
2. Prime Rate	CONSENSUS	3.3	3.5	4.2	4.7	5.0	5.2	4.5	5.2
	Top 10 Average	3.4	3.8	4.7	5.4	5.7	5.8	5.1	5.8
2 t mon 2 M	Bottom 10 Average	3.2	3.3	3.7	4.0	4.4	4.6	4.0	4.7
3. LIBOR, 3-Mo.	CONSENSUS	0.4	0.6	1.3	1.8	2.1	2.3	1.6	2.4
	Top 10 Average	0.5	1.0	1.8	2.4	2.7	2.9	2.2	3.0
4.C : 1D 1.M	Bottom 10 Average	0.2	0.4	0.8	1.2	1.6	1.7	1.1	1.8
4. Commercial Paper, 1-Mo	CONSENSUS	0.2	0.6	1.3	1.8	2.1	2.3	1.6	2.4
	Top 10 Average	0.4	0.9	1.6	2.3	2.6	2.8	2.0	2.8
5 T Dill Vi-14 2 M-	Bottom 10 Average	0.1	0.3	0.9	1.3	1.8	1.9	1.2	2.0
5. Treasury Bill Yield, 3-Mo	CONSENSUS	0.2	0.5	1.0	1.6	1.9	2.1	1.4	2.2
	Top 10 Average	0.3	0.8	1.6	2.2	2.5	2.7	1.9	2.7
6 T Dill Vi-14 6 M-	Bottom 10 Average	0.1	0.2	0.6	0.9	1.3	1.5	0.9	1.6
6. Treasury Bill Yield, 6-Mo	CONSENSUS	0.2	0.5	1.1	1.6	2.0	2.2	1.5	2.3
	Top 10 Average	0.3	0.8	1.7	2.3	2.6	2.7	2.0	2.8
7 Transport Bill Viold 1 Va	Bottom 10 Average	0.1	0.3	0.6	1.0	1.4	1.6	1.0	1.7
7. Treasury Bill Yield, 1-Yr	CONSENSUS Tom 10 Average	0.3	0.7 1.0	1.2	1.8 2.4	2.1	2.3	1.6 2.2	2.4 3.0
	Top 10 Average Bottom 10 Average	0.5		1.8		2.8	2.9		
8. Treasury Note Yield, 2-Yr	CONSENSUS	0.2 0.5	0.3 0.9	0.7 1.5	1.1 2.0	1.5 2.3	1.7 2.5	1.1 1.8	1.8 2.6
8. Heastiry Note Held, 2-11	Top 10 Average	0.7	1.3	2.1	2.7	3.0	3.1	2.5	3.3
	Bottom 10 Average	0.7	0.5	0.9	1.3	1.6	1.8	1.2	1.9
9. Treasury Note Yield, 5-Yr	CONSENSUS	1.2	1.6	2.1	2.5	2.8	2.8	2.4	3.0
7. Heasting Note Tierd, 3-11	Top 10 Average	1.5	2.0	2.8	3.3	3.5	3.5	3.0	3.6
	Bottom 10 Average	0.9	1.2	1.5	1.8	2.0	2.2	1.7	2.3
10. Treasury Note Yield, 10-Yr	-	2.0	2.4	2.7	3.0	3.2	3.3	2.9	3.3
10. Headily 1000 Held, 10 H	Top 10 Average	2.3	2.8	3.4	3.8	4.0	3.9	3.6	4.0
	Bottom 10 Average	1.7	1.9	2.1	2.3	2.5	2.6	2.3	2.7
11. Treasury Bond Yield, 30-Yr	-	2.6	2.9	3.3	3.6	3.8	3.8	3.5	3.9
11. Iteusury Benu Iteiu, 20 11	Top 10 Average	3.0	3.5	4.0	4.5	4.6	4.5	4.2	4.6
	Bottom 10 Average	2.3	2.4	2.5	2.7	2.9	3.1	2.7	3.2
12. Corporate Aaa Bond Yield	CONSENSUS	3.3	3.7	4.1	4.5	4.7	4.7	4.3	4.8
12. corporate rata Bond from	Top 10 Average	3.6	4.2	4.7	5.2	5.4	5.4	5.0	5.4
	Bottom 10 Average	3.1	3.2	3.4	3.7	3.9	4.1	3.7	4.2
13. Corporate Baa Bond Yield	CONSENSUS	4.3	4.7	5.1	5.4	5.6	5.7	5.3	5.8
	Top 10 Average	4.6	5.1	5.6	6.1	6.3	6.2	5.9	6.4
	Bottom 10 Average	4.0	4.3	4.5	4.7	4.9	5.2	4.7	5.2
14. State & Local Bonds Yield	CONSENSUS	2.9	3.2	3.6	3.9	4.1	4.2	3.8	4.2
	Top 10 Average	3.2	3.5	4.1	4.5	4.7	4.7	4.3	4.8
	Bottom 10 Average	2.6	2.9	3.1	3.4	3.7	3.7	3.3	3.8
15. Home Mortgage Rate	CONSENSUS	3.6	4.0	4.4	4.7	4.9	5.0	4.6	5.0
	Top 10 Average	4.0	4.5	5.0	5.5	5.6	5.6	5.2	5.7
	Bottom 10 Average	3.2	3.6	3.8	4.0	4.2	4.3	4.0	4.4
A. Fed's AFE Nominal \$ Index	CONSENSUS	103.7	103.7	104.0	103.7	103.6	103.3	103.7	103.1
	Top 10 Average	105.3	106.0	106.8	107.0	107.3	107.5	106.9	107.9
	Bottom 10 Average	102.0	101.5	101.4	100.8	100.4	100.0	100.8	99.4
				Year-Over-Ye	ar, % Change			Five-Year	r Averages
		2022	2023	2024	2025	2026	2027	2023-2027	2028-2032
B. Real GDP	CONSENSUS	4.2	2.6	2.3	2.2	2.1	2.1	2.2	2.1
	Top 10 Average	5.3	3.3	2.7	2.5	2.4	2.4	2.7	2.5
	Bottom 10 Average	2.9	2.0	1.9	1.8	1.8	1.7	1.8	1.7
C. GDP Chained Price Index	CONSENSUS	2.3	2.3	2.2	2.1	2.2	2.1	2.2	2.1
	Top 10 Average	2.6	2.6	2.4	2.4	2.4	2.4	2.4	2.3
	Bottom 10 Average	2.0	2.0	2.0	1.9	1.9	1.9	1.9	1.9
D. Consumer Price Index	CONSENSUS	2.4	2.4	2.2	2.2	2.2	2.2	2.2	2.2
	Top 10 Average	2.8	2.7	2.5	2.5	2.5	2.4	2.5	2.4
	Bottom 10 Average	2.1	2.1	1.9	1.9	2.0	1.9	2.0	1.9
E. PCE Price Index	CONSENSUS	2.3	2.2	2.1	2.1	2.1	2.1	2.1	2.1
	Top 10 Average	2.7	2.5	2.4	2.4	2.4	2.4	2.4	2.3
	Bottom 10 Average	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9

<u>Duke Energy Ohio, Inc.</u> Derivation of Mean Equity Risk Premium Based Studies Using Holding Period Returns and Projected Market Appreciation of the S&P Utility Index

Line No.		Implied Equity Risk Premium
	Equity Risk Premium based on S&P Utility Index Holding Period Returns (1):	
1.	Historical Equity Risk Premium	4.16 %
2.	Regression of Historical Equity Risk Premium (2)	6.51
3.	Forecasted Equity Risk Premium Based on PRPM (3)	4.94
4.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Value Line Data) (4)	7.15
5.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Bloomberg Data) (5)	5.32
6.	Average Equity Risk Premium (6)	5.62 %

- Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1928-2020. Holding period returns are calculated based upon income received (dividends and interest) plus the relative change in the market value of a security over a one-year holding period.
 - (2) This equity risk premium is based on a regression of the monthly equity risk premiums of the S&P Utility Index relative to Moody's A2 rated public utility bond yields from 1928 2020 referenced in note 1 above.
 - (3) The Predictive Risk Premium Model (PRPM) is applied to the risk premium of the monthly total returns of the S&P Utility Index and the monthly yields on Moody's A2 rated public utility bonds from January 1928 August 2021.
 - (4) Using data from Value Line for the S&P Utilities Index, an expected return of 10.94% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A2 rated public utility bond yield of 3.79%, calculated on line 3 of page 3 of this Attachment results in an equity risk premium of 7.15%. (10.94% 3.79% = 7.15%).
 - (5) Using data from Bloomberg Professional Service for the S&P Utilities Index, an expected return of 9.11% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A2 rated public utility bond yield of 3.79%, calculated on line 3 of page 3 of this Attachment results in an equity risk premium of 5.32%. (9.11% 3.79% = 5.32%).
 - (6) Average of lines 1 through 5.

<u>Duke Energy Ohio, Inc.</u> <u>Prediction of Equity Risk Premiums Relative to</u> <u>Moody's A2 Rated Utility Bond Yields</u>



		Prospective A2	Prospective
		Rated Utility	Equity Risk
Constant	Slope	Bond (1)	Premium
7.654483 %	-0.48549	3.79 %	5.81 %
	<u> </u>		Pren

Notes:

(1) From line 3 of page 3 of this Attachment.

Source of Information: Regulatory Research Associates

<u>Duke Energy Ohio, Inc.</u> Indicated Common Equity Cost Rate Through Use of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

[8]	Indicated Common Equity Cost Rate (3)	12.11 % 11.59 12.11 12.80 13.24 12.72 12.45 12.19 13.58 14.02 12.45 12.45 12.45 12.45 12.45 12.45 12.45 12.45 12.45 12.59 %
	Inc Co Equ Ra	12.11 11.59 12.11 12.80 13.24 12.45 12.45 12.45 12.45 12.45 12.45 12.45 12.45 12.45
[7]	ECAPM Cost Rate	12.18 % 11.73 12.18 12.78 13.15 12.70 12.48 12.26 13.45 13.82 12.48 12.48 12.48 12.48 12.48 12.48 12.48 12.48 12.48
[9]	Traditional CAPM Cost Rate	12.03 % 11.44 12.03 12.83 13.32 12.73 12.73 12.43 12.43 12.43 12.43 12.43 12.43 12.43 12.43 12.43 12.54
[2]	Risk-Free Rate (2)	2.70 % 2.70 2.70 2.70 2.70 2.70 2.70 2.70 2.70
[4]	Market Risk Premium (1)	9,93 % 6,93 % 6,93 % 6,93 % 6,93 % 6,93 % 6,93 %
[3]	Average Beta	0.94 0.88 0.94 1.02 1.07 1.01 0.98 0.98 0.98 0.98 0.98 0.98 0.98 0.98
[2]	Bloomberg Adjusted Beta	1.03 0.95 0.98 1.10 1.10 1.07 1.27 1.28 1.07 1.16 0.99
[1]	Value Line Adjusted Beta	0.85 0.80 0.90 0.95 0.95 0.95 0.95 0.90 0.90 0.9
	Proxy Group of Fourteen Electric Companies	Alliant Energy Corporation Ameren Corporation Duke Energy Corporation Edison International Entergy Corporation Evergy, Inc. Eversource Energy IDACORP, Inc. NorthWestern Corporation OGE Energy Corporation Otter Tail Corporation Pinnacle West Capital Corporation Portland General Electric Company Xcel Energy, Inc. Mean Median

Notes on page 2 of this Attachment

<u>Duke Energy Ohio, Inc.</u> <u>Notes to Accompany the Application of the CAPM and ECAPM</u>

Notes:

(1) The market risk premium (MRP) is derived by using six different measures from three sources: Ibbotson, Value Line, and Bloomberg as illustrated below:

Historical Data MRP Estimates:

Arithmetic Mean Monthly Returns for Large Stocks 1926-2020: Arithmetic Mean Income Returns on Long-Term Government Bonds: MRP based on Ibbotson Historical Data:	12.20 % 5.05 7.15 %
Measure 2: Application of a Regression Analysis to Ibbotson Historical Data (1926-2020)	9.57 %
Measure 3: Application of the PRPM to Ibbotson Historical Data: (January 1926 - August 2021)	8.77 %
Value Line MRP Estimates:	
Measure 4: Value Line Projected MRP (Thirteen weeks ending September 03, 2021)	
Total projected return on the market 3-5 years hence*: Projected Risk-Free Rate (see note 2): MRP based on Value Line Summary & Index: *Forcasted 3-5 year capital appreciation plus expected dividend yield	8.95 % 2.70 6.25 %
Measure 5: Value Line Projected Return on the Market based on the S&P 500	
Total return on the Market based on the S&P 500: Projected Risk-Free Rate (see note 2): MRP based on Value Line data	15.05 % 2.70 12.35 %
Measure 6: Bloomberg Projected MRP	
Total return on the Market based on the S&P 500: Projected Risk-Free Rate (see note 2): MRP based on Bloomberg data	18.17 % 2.70 15.47 %
Average of Value Line, Ibbotson, and Bloomberg MRP:	9.93 %

(2) For reasons explained in the direct testimony, the appropriate risk-free rate for cost of capital purposes is the average forecast of 30 year Treasury Bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts. (See pages 10 and 11 of Attachment DWD-3.) The projection of the risk-free rate is illustrated below:

Third Quarter 2021	2.10 %	
Fourth Quarter 2021	2.20	
First Quarter 2022	2.30	
Second Quarter 2022	2.50	
Third Quarter 2022	2.50	
Fourth Quarter 2022	2.60	
2023-2027	3.50	
2028-2032	3.90	
	2.70 %	

(3) Average of Column 6 and Column 7.

Sources of Information:

Value Line Summary and Index

Blue Chip Financial Forecasts, September 1, 2021 and June 1, 2021

Bonds,

Bloomberg Professional Services

PUCO Case No. 21-887-EL-AIR Attachment DWD-5 Page 1 of 3

<u>Duke Energy Ohio, Inc.</u> Basis of Selection of the Group of Non-Price Regulated Companies <u>Comparable in Total Risk to the Utility Proxy Group</u>

The criteria for selection of the proxy group of fifty non-price regulated companies was that the non-price regulated companies be domestic and reported in <u>Value Line Investment Survey</u> (Standard Edition).

The Non-Price Regulated Proxy Group were then selected based on the unadjusted beta range of 0.68 - 0.96 and residual standard error of the regression range of 2.5646 - 3.0586 of the Utility Proxy Group.

These ranges are based upon plus or minus two standard deviations of the unadjusted beta and standard error of the regression. Plus or minus two standard deviations captures 95.50% of the distribution of unadjusted betas and residual standard errors of the regression.

The standard deviation of the Utility Proxy Group's residual standard error of the regression is 0.1235. The standard deviation of the standard error of the regression is calculated as follows:

Standard Deviation of the Std. Err. of the Regr. = Standard Error of the Regression $\sqrt{2N}$

where: N = number of observations. Since Value Line betas are derived from weekly price change observations over a period of five years, N = 259

Thus,
$$0.1235 = \frac{2.8116}{\sqrt{518}} = \frac{2.8116}{22.7596}$$

Source of Information: Value Line, Inc., June 2021

Value Line Investment Survey (Standard Edition)

<u>Duke Energy Ohio, Inc.</u> Basis of Selection of Comparable Risk <u>Domestic Non-Price Regulated Companies</u>

	[1]	[2]	[3]	[4]
Proxy Group of Fourteen Electric Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Alliant Energy Corporation	0.85	0.72	2.7798	0.0694
Ameren Corporation	0.80	0.69	2.6359	0.0658
Duke Energy Corporation	0.85	0.77	2.7562	0.0688
Edison International	0.95	0.91	3.2779	0.0818
Entergy Corporation	0.95	0.88	2.7090	0.0676
Evergy, Inc.	0.95	0.90	3.2697	0.0861
Eversource Energy	0.90	0.84	3.0312	0.0756
IDACORP, Inc.	0.85	0.70	2.5983	0.0648
NorthWestern Corporation	0.95	0.89	2.8009	0.0699
OGE Energy Corporation	1.05	1.06	2.7189	0.0678
Otter Tail Corporation	0.90	0.79	2.4385	0.0608
Pinnacle West Capital Corporation	0.90	0.84	2.7822	0.0694
Portland General Electric Company	0.90	0.79	2.8356	0.0707
Xcel Energy, Inc.	0.80	0.66	2.7280	0.0681
Average	0.90	0.82	2.8116	0.0705
Beta Range (+/- 2 std. Devs. of Beta) 2 std. Devs. of Beta	0.68 0.14	0.96		
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.5646	3.0586		
Std. dev. of the Res. Std. Err.	0.1235			
2 std. devs. of the Res. Std. Err.	0.2470			

Source of Information: Valueline Proprietary Database, June 2021

<u>Duke Energy Ohio, Inc.</u> Proxy Group of Non-Price Regulated Companies Comparable in Total Risk to the <u>Proxy Group of Fourteen Electric Companies</u>

[1] [2] [3] [4]

Proxy Group of Fifty Non-Price Regulated Companies	VL Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Agilent Technologies	0.90	0.79	2.5758	0.0643
Abbott Labs.	0.90	0.84	2.7516	0.0687
Analog Devices	0.95	0.87	2.7247	0.0680
Assurant Inc.	0.90	0.84	2.8245	0.0705
Smith (A.O.)	0.85	0.75	2.7193	0.0678
Air Products & Chem.	0.90	0.79	2.6162	0.0653
Brown-Forman 'B'	0.90	0.81	2.7054	0.0675
Broadridge Fin'l	0.80	0.69	2.7697	0.0691
Brady Corp.	1.00	0.94	2.9465	0.0735
CACI Int'l	0.95	0.89	2.9930	0.0747
Cerner Corp.	0.90	0.82	2.6729	0.0667
Chemed Corp.	0.85	0.70	2.6649	0.0665
Cooper Cos.	0.95	0.90	2.6935	0.0672
CSW Industrials	0.90	0.82	2.8095	0.0701
Quest Diagnostics	0.80	0.69	2.9288	0.0731
Dolby Labs.	0.95	0.90	2.6027	0.0649
Lauder (Estee)	0.95	0.91	2.8562	0.0713
Exponent, Inc.	0.90	0.81	2.9605	0.0739
FactSet Research	1.00	0.95	2.6488	0.0661
Gentex Corp.	0.95	0.92	2.7712	0.0691
Hershey Co.	0.85	0.74	2.6733	0.0667
Ingredion Inc.	0.90	0.84	2.8771	0.0718
Hunt (J.B.)	0.95	0.87	2.8702	0.0716
J&J Snack Foods	0.95	0.86	2.9559	0.0738
Henry (Jack) & Assoc	0.85	0.71	2.8328	0.0707
L3Harris Technologie	1.00	0.93	2.7401	0.0772
Lennox Int'l	1.00	0.92	2.6639	0.0665
McCormick & Co.	0.80	0.68	2.7869	0.0695
Monster Beverage	0.85	0.76	3.0195	0.0753
Altria Group	0.95	0.86	2.9525	0.0737
MSA Safety	1.00	0.94	3.0342	0.0757
MSCI Inc.	0.95	0.87	2.9742	0.0742
Motorola Solutions	0.90	0.79	2.7312	0.0681
Mettler-Toledo Int'l	0.95	0.90	2.6192	0.0653
Northrop Grumman	0.85	0.72	2.8865	0.0720
Old Dominion Freight	0.95	0.86	2.9913	0.0746
Packaging Corp.	1.00	0.92	2.8690	0.0716
PerkinElmer Inc.	0.90	0.82	3.0422	0.0759
Post Holdings	0.95	0.87	2.9481	0.0736
Rollins, Inc.	0.85	0.73	2.9580	0.0738
Sherwin-Williams	0.95	0.85	2.6598	0.0664
Selective Ins. Group	0.90	0.80	2.9918	0.0746
Sirius XM Holdings	0.95	0.88	2.8551	0.0712
Synopsys, Inc.	0.95	0.91	2.8936	0.0722
Texas Instruments	0.85	0.76	2.6736	0.0667
AMERCO UniFirst Corp	0.95	0.89	2.6678	0.0666
UniFirst Corp. VeriSign Inc.	1.00 0.90	0.92 0.79	2.7694 2.6717	0.0691 0.0667
Waters Corp.	0.90	0.79	2.7917	0.0667
Watsco, Inc.	0.95	0.73	2.7408	0.0697
Average	0.92	0.83	2.8100	0.0700
Proxy Group of Fourteen Electric Companies	0.00	0.02	2.0117	0.0705
Companies	0.90	0.82	2.8116	0.0705

Source of Information:

Valueline Proprietary Database, June 2021

Duke Energy Ohio, Inc.

Summary of Cost of Equity Models Applied to Proxy Group of Fifty Non-Price Regulated Companies Comparable in Total Risk to the Proxy Group of Fifty Non-Price Regulated Companies

Principal Methods		Proxy Group Fifty Non-Pric Regulated Companies	
Discounted Cash Flow Model (DCF) (1)		12.92	%
Risk Premium Model (RPM) (2)		12.64	%
Capital Asset Pricing Model (CAPM) (3)	-	12.00	_%
	Mean	12.52	%
	Median	12.64	%
A	Average of Mean and Median	12.58	%

Notes:

- (1) From page 2 of this Attachment.
- (2) From page 3 of this Attachment.
- (3) From page 6 of this Attachment.

12.92 %

Average of Mean and Median

<u>Duke Energy Ohio, Inc.</u> DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the <u>Proxy Group of Fifty Non-Price Regulated Companies</u>

[1] [2] [3] [4] [5] [6] [7]

Proxy Group of Fifty Non-Price Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (1)
Agilent Technologies	0.51 %	11.50 %	13.00 %	53.30 %	25.93 %	0.57 %	26.50 %
Abbott Labs.	1.52	11.50	11.90	12.53	11.98	1.61	13.59
Analog Devices	1.66	8.50	12.30	13.52	11.44	1.75	13.19
Assurant Inc.	1.66	11.50	17.90	17.90	15.77	1.79	17.56
Smith (A.O.)	1.48	9.50	9.00	8.00	8.83	1.54	10.37
Air Products & Chem.	2.10	12.00	10.50	11.96	11.49	2.22	13.71
Brown-Forman 'B'	0.99	13.00	NA	8.44	10.72	1.05	11.77
Broadridge Fin'l	1.52	8.50	NA	11.80	10.15	1.60	11.75
Brady Corp.	1.61	7.50	7.00	7.00	7.17	1.66	8.83
CACI Int'l	-	13.50	5.40	1.44	6.78	-	NA
Cerner Corp.	1.11	9.00	12.30	11.81	11.04	1.18	12.22
Chemed Corp.	0.30	9.00	7.50	7.55	8.02	0.32	8.34
Cooper Cos.	0.01	14.50	10.00	10.00	11.50	0.02	11.52
CSW Industrials	0.49	11.50	NA	12.00	11.75	0.52	12.27
Quest Diagnostics	1.78	7.00	26.50	(8.60)	16.75	1.93	18.68
Dolby Labs.	0.89	9.50	13.00	16.00	12.83	0.95	13.78
Lauder (Estee)	0.66	11.00	11.30	18.71	13.67	0.71	14.38
Exponent, Inc.	0.80	12.00	NA	15.00	13.50	0.86	14.36
FactSet Research	0.94	9.50	8.00	6.29	7.93	0.98	8.91
Gentex Corp.	1.47	12.00	10.50	15.80	12.77	1.56	14.33
Hershey Co.	2.04	5.50	7.70	8.82	7.34	2.12	9.46
Ingredion Inc.	2.87	7.50	NA	1.90	4.70	2.93	7.63
Hunt (J.B.)	0.72	8.00	15.00	20.50	14.50	0.77	15.27
J&J Snack Foods	1.50	10.00	NA	6.00	8.00	1.56	9.56
Henry (Jack) & Assoc	1.08	9.50	11.00	9.64	10.05	1.14	11.19
L3Harris Technologie	1.81	NMF	8.60	10.21	9.41	1.89	11.30
Lennox Int'l	1.11	9.00	NA	16.72	12.86	1.18	14.04
McCormick & Co.	1.57	6.00	6.80	6.50	6.43	1.62	8.05
Monster Beverage	-	11.50	14.70	14.85	13.68	-	NA
Altria Group	7.52	6.00	4.00	4.67	4.89	7.70	12.59
MSA Safety	1.08	6.50	NA	18.00	12.25	1.15	13.40
MSCI Inc.	0.73	16.00	NA	17.79	16.90	0.79	17.69
Motorola Solutions	1.27	7.00	9.00	13.73	9.91	1.33	11.24
Mettler-Toledo Int'l		12.00	17.00	17.80	15.60	1.70	NA 9.79
Northrop Grumman Old Dominion Freight	1.72 0.30	7.00 9.50	9.00 22.70	NA 6.66	8.00 12.95	1.79 0.32	13.27
Packaging Corp.	2.86	5.00	5.00	22.70	12.95	3.01	13.91
PerkinElmer Inc.	0.17	11.00	37.90	16.86	21.92	0.19	22.11
Post Holdings	0.17	9.50	NA	37.90	23.70	0.19	NA
Rollins, Inc.	0.88	11.50	NA NA	28.20	19.85	0.97	20.82
Sherwin-Williams	0.77	10.50	12.60	8.20	10.43	0.81	11.24
Selective Ins. Group	1.25	9.50	12.40	11.87	11.26	1.32	12.58
Sirius XM Holdings	0.91	31.50	12.20	10.00	17.90	0.99	18.89
Synopsys, Inc.	-	13.00	16.00	10.05	13.02	-	NA
Texas Instruments	2.16	8.50	9.30	16.00	11.27	2.28	13.55
AMERCO	-	13.50	NA	10.00	11.75	-	NA
UniFirst Corp.	0.45	5.50	NA	15.00	10.25	0.47	10.72
VeriSign Inc.	-	8.50	NA	10.00	9.25	-	NA
Waters Corp.	-	6.00	9.40	8.00	7.80	-	NA
Watsco, Inc.	2.77	8.00	NA	9.30	8.65	2.88	11.53
						Mean	13.24 %
						Median	12.59 %

NA= Not Available NMF= Not Meaningful Figure

Source of Information:

Value Line Investment Survey www.zacks.com Downloaded on 08/31/2021 www.yahoo.com Downloaded on 08/31/2021 Bloomberg Professional Services

⁽¹⁾ The application of the DCF model to the domestic, non-price regluated comparable risk companies is identical to the application of the DCF to the Utility Proxy Group. The dividend yield is derived by using the 60 day average price and the spot indicated dividend as of August 31, 2021. The dividend yield is then adjusted by 1/2 the average projected growth rate in EPS, which is calculated by averaging the 5 year projected growth in EPS provided by Value Line, www.zacks.com, and www.yahoo.com (excluding any negative growth rates) and then adding that growth rate to the adjusted dividend yield.

<u>Duke Energy Ohio, Inc.</u> Indicated Common Equity Cost Rate Through Use of a Risk Premium Model <u>Using an Adjusted Total Market Approach</u>

<u>Line No.</u>		Proxy Group of Fifty Non-Price Regulated Companies
1.	Prospective Yield on Baa2 Rated Corporate Bonds (1)	4.30 %
2.	Adjustment to Reflect Proxy Group Bond Rating (2)	(0.12)
3.	Prospective Bond Rating	4.18
4.	Equity Risk Premium (3)	8.46
5	Risk Premium Derived Common	
	Equity Cost Rate	12.64 %
Notes:	(1) Average forecast of Baa2 corporate bonds based upon the consensus	•

Notes: (1) Average forecast of Baa2 corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated September 1, 2021 and June 1, 2021 (see pages 10 and 11 of Attachment DWD-3). The estimates are detailed below.

Third Quarter 2021	3.40 %
Fourth Quarter 2021	3.70
First Quarter 2022	3.90
Second Quarter 2022	4.00
Third Quarter 2022	4.10
Fourth Quarter 2022	4.20
2023-2027	5.30
2028-2032	5.80
Average	4.30 %

(2) To reflect the Baa1 average rating of the non-utility proxy group, the prosepctive yield on Baa2 corporate bonds must be adjusted downward by 1/3 of the spread between A2 and Baa2 corporate bond yields as shown below:

	A2 Corp.		Baa2 Corp.			
	Bond Yield		Bond Yield		Spread	
Aug-2021	2.89	%	3.24	%	0.35	%
Jul-2021	2.89		3.24		0.35	
Jun-2021	3.10		3.45		0.35	
	Avera	age y	ield spread		0.35	%
						=
		1,	/3 of spread		0.12	%

(3) From page 5 of this Attachment.

<u>Duke Energy Ohio, Inc.</u> Comparison of Long-Term Issuer Ratings for the Proxy Group of Fifty Non-Price Regulated Companies of Comparable risk to the Proxy Group of Fifty Non-Price Regulated Companies

Moody's Long-Term Issuer Rating August 2021

Standard & Poor's Long-Term Issuer Rating August 2021

Proxy Group of Fifty Non-Price Regulated Companies	Long-Term Issuer Rating	Numerical Weighting (1)	Long-Term Issuer Rating	Numerical Weighting (1)
Agilent Technologies	Baa2	9.0	BBB+	8.0
Abbott Labs.	A2	6.0	A+	5.0
Analog Devices	Baa1	8.0	BBB+	8.0
Assurant Inc.	Baa3	10.0	BBB	9.0
Smith (A.O.)	NA		NA	
Air Products & Chem.	A2	6.0	A	6.0
Brown-Forman 'B'	A1	5.0	A-	7.0
Broadridge Fin'l	Baa1	8.0	BBB+	8.0
Brady Corp.	NA		NA	
CACI Int'l	NA		BB+	11.0
Cerner Corp.	NA		NA	
Chemed Corp.	WR		NR	
Cooper Cos.	WR		NR	
CSW Industrials	NA		NA	
Quest Diagnostics	Baa2	9.0	BBB+	8.0
Dolby Labs.	NA		NA	
Lauder (Estee)	A1	5.0	A+	5.0
Exponent, Inc.	NA		NA	
FactSet Research	NA		NA	
Gentex Corp.	NA		NA	
Hershey Co.	A1	5.0	A	6.0
Ingredion Inc.	Baa1	8.0	BBB	9.0
Hunt (J.B.)	Baa1	8.0	BBB+	8.0
J&J Snack Foods	NA		NA	
Henry (Jack) & Assoc	NA		NA	
L3Harris Technologie	Baa2	9.0	BBB	9.0
Lennox Int'l	Baa2	9.0	BBB	9.0
McCormick & Co.	Baa2	9.0	BBB	9.0
Monster Beverage	NA		NA	
Altria Group	A3	7.0	BBB	9.0
MSA Safety	NA		NA	
MSCI Inc.	Ba1	11.0	BB+	11.0
Motorola Solutions	Baa3	10.0	BBB-	10.0
Mettler-Toledo Int'l	WR		NR	
Northrop Grumman	Baa1	8.0	BBB+	8.0
Old Dominion Freight	NA		NA	
Packaging Corp.	Baa2	9.0	BBB	9.0
PerkinElmer Inc.	Baa3	10.0	BBB	9.0
Post Holdings	B2	15.0	B+	14.0
Rollins, Inc.	NA		NA	
Sherwin-Williams	Baa2	9.0	BBB	9.0
Selective Ins. Group	Baa2	9.0	BBB	9.0
Sirius XM Holdings	NA		BB	12.0
Synopsys, Inc.	NA		NA	
Texas Instruments	A1	5.0	A+	5.0
AMERCO	WR		NR	
UniFirst Corp.	NA		NA	
VeriSign Inc.	Baa3	10.0	BBB	9.0
Waters Corp.	NA		NA	
Watsco, Inc.	NA NA		NA	
Average	Baa1	8.3	BBB+/BBB	8.5

Notes:

(1) From page 6 of Attachment DWD-3.

Source of Information:

Bloomberg Professional Services

Duke Energy Ohio, Inc.

Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for

Proxy Group of Fifty Non-Price Regulated Companies of Comparable risk to the Proxy Group of Fifty Non-Price Regulated Companies

Line No.	Equity Risk Premium Measure	Proxy Group of Fifty Non-Price Regulated Companies
<u>Ib</u>	botson-Based Equity Risk Premiums:	
1.	Ibbotson Equity Risk Premium (1)	5.92 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.87
3.	Ibbotson Equity Risk Premium based on PRPM (3)	7.88
4.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (4)	5.54
5	Equity Risk Premium Based on <u>Value Line</u> S&P 500 Companies (5)	11.64
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	14.76
7.	Conclusion of Equity Risk Premium	9.10 %
8.	Adjusted Beta (7)	0.93
9.	Forecasted Equity Risk Premium	8.46 %
-	From note 1 of page 9 of Attachment DWD-3. From note 2 of page 9 of Attachment DWD-3. From note 2 of page 9 of Attachment DWD-3.	

- (3) From note 3 of page 9 of Attachment DWD-3.
- (4) From note 4 of page 9 of Attachment DWD-3.
- (5) From note 5 of page 9 of Attachment DWD-3.
- (6) From note 6 of page 9 of Attachment DWD-3.
- (7) Average of mean and median beta from page 6 of this Attachment.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2021 SBBI Yearbook, John Wiley & Sons, Inc. Value Line Summary and Index Blue Chip Financial Forecasts, September 1, 2021 and June 1, 2021

Bloomberg Professional Services

Duke Energy Ohio, Inc. Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Fifty Non-Price Regulated Companies

[1] [2] [4] [5] [6] [7] [8] [3]

Proxy Group of Fifty Non-Price Regulated Companies	Value Line Adjusted Beta	Bloomberg Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
Agilent Technologies	0.90	0.86	0.88	9.93 %	2.70 %	11.44 %	11.74 %	11.59 %
Abbott Labs.	0.90	0.84	0.87	9.93	2.70	11.34	11.66	11.50
Analog Devices	0.95	1.02	0.98	9.93	2.70	12.43	12.48	12.45
Assurant Inc.	0.90	1.01	0.95	9.93	2.70	12.13	12.26	12.19
Smith (A.O.)	0.85	1.00	0.93	9.93	2.70	11.93	12.11	12.02
Air Products & Chem.	0.90	0.90	0.90	9.93	2.70	11.64	11.88	11.76
Brown-Forman 'B'	0.90	0.97	0.93	9.93	2.70	11.93	12.11	12.02
Broadridge Fin'l	0.85	0.83	0.84	9.93	2.70	11.04	11.44	11.24
Brady Corp.	1.00	1.07	1.04	9.93	2.70	13.03	12.93	12.98
CACI Int'l	0.95	1.00	0.98	9.93	2.70	12.43	12.48	12.45
Cerner Corp.	0.90	0.89	0.89	9.93	2.70	11.54	11.81	11.67
Chemed Corp.	0.85	0.92	0.89	9.93	2.70	11.54	11.81	11.67
Cooper Cos.	0.95	0.94	0.95	9.93	2.70	12.13	12.26	12.19
CSW Industrials	0.90	1.05	0.98	9.93	2.70	12.43	12.48	12.45
Quest Diagnostics	0.80	0.97	0.88	9.93	2.70	11.44	11.74	11.59
Dolby Labs.	0.95	0.94	0.94	9.93	2.70	12.03	12.18	12.11
Lauder (Estee)	0.95	1.01	0.98	9.93	2.70	12.43	12.48	12.45
Exponent, Inc.	0.90	0.96	0.93	9.93	2.70	11.93	12.11	12.02
FactSet Research	1.00	0.98	0.99	9.93	2.70	12.53	12.55	12.54
Gentex Corp.	0.95	1.07	1.01	9.93	2.70	12.73	12.70	12.72
Hershey Co.	0.85	0.85	0.85	9.93	2.70	11.14	11.51	11.33
Ingredion Inc.	0.90	0.93	0.91	9.93	2.70	11.74	11.96	11.85
Hunt (J.B.)	0.95	0.94	0.94	9.93	2.70	12.03	12.18	12.11
J&J Snack Foods	0.95	0.81	0.88	9.93	2.70	11.44	11.74	11.59
Henry (Jack) & Assoc	0.85	0.88	0.87	9.93	2.70	11.34	11.66	11.50
L3Harris Technologie	1.00	1.00	1.00	9.93	2.70	12.63	12.63	12.63
Lennox Int'l	1.00	1.04	1.02	9.93	2.70	12.83	12.78	12.80
McCormick & Co.	0.80	0.70	0.75	9.93	2.70	10.15	10.77	10.46
Monster Beverage	0.85	0.97	0.91	9.93	2.70	11.74	11.96	11.85
Altria Group	0.95	0.91	0.93	9.93	2.70	11.93	12.11	12.02
MSA Safety	1.00	1.00	1.00	9.93	2.70	12.63	12.63	12.63
MSCI Inc.	0.95	0.93	0.94	9.93	2.70	12.03	12.18	12.11
Motorola Solutions	0.90	0.96	0.93	9.93	2.70	11.93	12.11	12.02
Mettler-Toledo Int'l	0.95	0.90	0.93	9.93	2.70	11.93	12.11	12.02
Northrop Grumman	0.85	0.79	0.82	9.93	2.70	10.84	11.29	11.06
Old Dominion Freight	0.90	0.98	0.94	9.93	2.70	12.03	12.18	12.11
Packaging Corp.	1.00	0.79	0.90	9.93	2.70	11.64	11.88	11.76
PerkinElmer Inc.	0.90	0.80	0.85	9.93	2.70	11.14	11.51	11.33
Post Holdings	0.95	0.90	0.92	9.93	2.70	11.83	12.03	11.93
Rollins, Inc.	0.85	0.69	0.77	9.93	2.70	10.35	10.92	10.63
Sherwin-Williams	0.95	0.99	0.97	9.93	2.70	12.33	12.41	12.37
Selective Ins. Group	0.90	0.99	0.94	9.93	2.70	12.03	12.18	12.11
Sirius XM Holdings	0.95	1.12	1.04	9.93	2.70	13.03	12.93	12.98
Synopsys, Inc.	0.95	1.02	0.98	9.93	2.70	12.43	12.48	12.45
Texas Instruments	0.85	0.89	0.87	9.93	2.70	11.34	11.66	11.50
AMERCO	0.95	1.08	1.01	9.93	2.70	12.73	12.70	12.72
UniFirst Corp.	0.95	1.13	1.04	9.93	2.70	13.03	12.93	12.98
VeriSign Inc.	0.90	0.77	0.84	9.93	2.70	11.04	11.44	11.24
Waters Corp.	0.95	0.85	0.90	9.93	2.70	11.64	11.88	11.76
Watsco, Inc.	0.85	0.80	0.83	9.93	2.70	10.94	11.36	11.15
Mean			0.92			11.88 %	12.07 %	11.97 %
Median			0.93			11.93 %	12.11 %	12.02 %
Average of Mean and Median			0.93			11.91 %	12.09 %	12.00 %

- (1) From note 1 of page 2 of Attachment DWD-4.
 (2) From note 2 of page 2 of Attachment DWD-4.
 (3) Average of CAPM and ECAPM cost rates.

Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAQ Derivation of Investment Risk Adjustment Based upon Duke Energy Ohio, Inc.

[4]

[3]

[2]

 \Box

Line No.

Τ:

	Ма	rket Capitalization 2021 (1	Market Capitalization on August 31, 2021 (1)	App	Applicable Decile of the NYSE/AMEX/ NASDAO (2)	Applicable Size Premium (3)	Spread from Applicable Size Premium (4)
		(millions)	(times larger)				
Duke Energy Ohio, Inc.	∨	3,517.131			ιΛ	1.09%	
Proxy Group of Fourteen Electric Companies	₩.	15,358.236	4.4 x	~	2	0.49%	0.60%
			[A]		[B]	[5]	[D]
					Market	Market	Size Premium (Return in
				Ca	Capitalization of	Capitalization of	Excess of
			Decile	Sms	Smallest Company (millions)	Largest Company (millions)	CAPM)*
		Largest	Н	↔	29,025.803	\$ 1,966,078.882	-0.22%
			2		13,178.743	28,808.073	0.49%
			3		6,743.361	13,177.828	0.71%
			4		3,861.858	6,710.676	0.75%
			2		2,445.693	3,836.536	1.09%
			9		1,591.865	2,444.745	1.37%
			7		911.586	1,591.765	1.54%
			8		451.955	911.103	1.46%
			6		190.019	451.800	2.29%
		Smallest	10		2.194	189.831	5.01%
			*	From 2	021 Duff & Phelps C	*From 2021 Duff & Phelps Cost of Capital Navigator	
Notes:							

(1) From page 2 of this Attachment.

⁽²⁾ Gleaned from Columns [B] and [C] on the bottom of this page. The appropriate decile (Column [A]) corresponds to the market capitalization of the proxy group, which is found in Column [1].

⁽³⁾ Corresponding risk premium to the decile is provided in Column [D] on the bottom of this page.

(4) Line No. 1 Column [3] – Line No. 2 Column [3]. For example, the 0.60% in Column [4], Line No. 2 is derived as follows 0.60% = 1.09% - 0.49%.

Market Capitalization of Duke Energy Ohio, Inc. and the Proxy Group of Fourteen Electric Companies Duke Energy Ohio, Inc.

[9]	Market Capitalization on August 31, 2021 (3) (millions)		3,517.131 (6)		15,189.501	22,224.310	80,483.540	21,915.989	22,149.081	15,526.970	31,049.067	5,316.934	3,443.608	7,082.749	2,275.452	8,671.248	4,597.742	36,948.890	15,358.236	
[5]	Market-to-Book Ratio on Ca August 31, Au		198.9 (5)		267.0 % \$	248.6	175.0	156.0	202.7	177.8	220.8	207.7	165.6	195.0	261.3	153.9	176.0	253.5	198.9 % \$	
[4]	Closing Stock Market Price on August 31, 2021	NA	I		\$ 60.790	87.720	104.660	57.840	110.610	68.450	90.730	105.350	63.600	35.410	54.870	76.900	51.350	68.750	\$ 68.600	
[3]	Total Common Equity at Fiscal Year End 2020 (millions)	1,768.291 (4)			2,688.000	8,938.000	46,002.000	14,048.000	10,926.142	8,733.400	14,063.566	2,559.980	2,079.095	3,631.800	996'028	5,633.503	2,613.000	14,575.000	7,210.700	
[2]	Book Value per Share at Fiscal Tota Year End 2020 at (1)	NA			22.764 \$	35.279	59.821	37.075	54.564	38.501	41.096	50.724	38.399	18.157	21.002	49.960	29.183	27.119	37.737 \$	
[1]	ck ing at 2020	NA			249.868 \$	253.355	769.000	378.907	200.245	226.837	342.214	50.469	54.145	200.021	41.470	112.760	89.537	537.438	213.541 \$	
[]	· I				~								~		~					ailable
	Exchange		rteen	S	NASDAQ	NYSE	NYSE	NYSE	NYSE	NYSE	NYSE	NYSE	NASDAQ	NYSE	NASDAQ	on NYSE	any NYSE	NASDAQ		NA= Not Available
	Company	Duke Energy Ohio, Inc.	Based upon Proxy Group of Fourteen Electric Companies	Proxy Group of Fourteen Electric Companies	Alliant Energy Corporation	Ameren Corporation	Duke Energy Corporation	Edison International	Entergy Corporation	Evergy, Inc.	Eversource Energy	IDACORP, Inc.	NorthWestern Corporation	OGE Energy Corporation	Otter Tail Corporation	Pinnacle West Capital Corporation	Portland General Electric Company	Xcel Energy, Inc.	Median	

Notes: (1) Column 3 / Column 1.

(2) Column 4 / Column 2.

(3) Column 1 * Column 4.

(4) Company provided

(5) The market-to-book ratio of Duke Energy Ohio, Inc. on August 31, 2021 is assumed to be equal to the market-to-book ratio of Proxy Group of Fourteen Electric Companies on August 31, 2021 as appropriate.

(6) Column [3] multiplied by Column [5].

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Bloomberg Professional

 $\underline{Duke\ Energy\ Ohio.\ Inc.}$ Derivation of the Flotation Cost Adjustment to the Cost of Common Equity.

Equity Issuances since 2010

[Column 10]	Flotation Cost Percentage (7)	3.02% 2.38% 4.84% 3.10%
[Column 9]	Total Flotation Costs (6)	\$ 77,067,000 \$ 38,489,700 \$ 37,737,625 \$ 153,294,325
[Column 8]	Total Net Proceeds (5)	\$ 2,471,620,500 \$ 1,575,431,800 \$ 742,523,000 \$ 4,789,575,300
[Column 7]	Gross Equity Issue before Costs (4)	\$ 2,548,687,500 \$ 1,613,921,500 \$ 780,260,625 \$ 4,942,869,625
[Column 6]	Net Proceeds per Share (3)	\$ 85.9694 \$ 74.0508 \$ 69.8024
[Column 5]	Total Offering Expense per Share	\$ 0.021 \$ 0.021 \$ 0.038
[Column 4]	Market Pressure (2)	\$ 2.66
[Column 3]	Average Offering Price per Share	\$ 85.99 \$ 74.07 \$ 69.84
[Column 2]	Market Price per Share	\$ 88.65 \$ 75.86 \$ 73.35
[Column 1]	Shares Issued	28,750,000 21,275,000 10,637,500
	Transaction (1)	Equity Offering Equity Offering Equity Offering
	Date of Offering	11/18/19 03/06/18 03/01/16

	2
Flotation Cost Adjustment (10)	2
DCF Cost Rate Adjusted for Flotation (9)	6
, 1	č
Average DCF Cost Rate Unadjusted for Flotation (8)	
I	6
Adjusted Dividend Yield	
اء ت	0
Average Projected EPS Growth Rate	ı
_ 1	ò
Average Dividend Yield	

Flotation Cost Adjustment

See page 2 of this Attachment for notes.

Proxy Group of Fourteen Electric Companies Source of Information: Company SEC filings

<u>Duke Energy Ohio, Inc.</u> Notes to Accompany the Derivation of the Flotation Cost Adjustment to the Cost of Common Equity

- (1) Company SEC Filings.
- (2) Column 2 Column 3.
- (3) Column 1 * Column 2.
- (4) Column1 * Column 4.
- (5) Column 1 * Column 3.
- (6) Column 5 Column 6
- (7) (Column 5 Column 6) divided by Column 5.
- (8) Using the average growth rate from page 1 of Attachment DWD-2.
- (9) Adjustment for flotation costs based on adjusting the average DCF constant growth cost rate in accordance with the following:

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

where g is the growth factor and F is the percentage of flotation costs.

(10) Flotation cost adjustment of 0.11% equals the difference between the flotation adjusted average DCF cost rate of 8.93% and the unadjusted average DCF cost rate of 8.82% of the Utility Proxy Group.

Source of Information:

Company SEC Filings.

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Case No(s). 21-0887-EL-AIR, 21-0888-EL-ATA, 21-0889-EL-AAM

Summary: Testimony Direct Testimony of Dylan W. D'Ascendis electronically filed by Mrs. Tammy M. Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Kingery, Jeanne W. and Vaysman, Larisa and Elizabeth M. Brama