# **APPENDIX E**

# Testimony and Exhibits of Richard L. Ansaldo

# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

New York Power Authority ) Docket No. ER15-\_\_\_-000

# PREPARED DIRECT TESTIMONY OF RICHARD L. ANSALDO ON BEHALF OF NEW YORK POWER AUTHORITY

JULY 2, 2015

### UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

New York Power Authority ) Docket No. ER15-\_\_\_-000

# PREPARED DIRECT TESTIMONY OF RICHARD L. ANSALDO

1	Q.	Please state your name and business address.
2	A.	Richard L. Ansaldo, P.O. Box 2542, Albany, NY 12220.
3	Q.	By whom are you employed and in what capacity?
4	A.	I am a self-employed financial utility consultant. In this proceeding I am working with
5		the consulting firm Nexant, Inc. and representing the New York Power Authority
6		("NYPA" or "Authority"). My experience, background and qualifications are provided as
7		Exhibit No. PA-302.
8		Purpose of Testimony
9	Q.	What is the purpose of your testimony?
10	A.	My testimony provides support for (i) NYPA's requested 9.34% return on equity (or
11		"ROE"); and (ii) a proposed 60% cap on the equity component of NYPA's capital
12		structure. The ROE and capital structure are components of the overall rate of return
13		("ROR") that NYPA will earn on its transmission rate base through the formula rate
14		which NYPA proposes to adopt in this filing.

1 Overview Of Return On Equity For NYPA	1	Overview	Of Return	On Equity	y For NYPA
---	---	----------	-----------	-----------	------------

Q. What is the overall guiding principle that sets the standard for setting a fair and reasonable return on equity that should apply to NYPA?

4

12

- First, and fundamentally, a reasonable ROE for NYPA should comply with the
  established standards of the U.S. Supreme Court decisions in *Hope* and *Bluefield*(Federal Power Comm. v. Hope Nat. Gas Co., 320 U.S. 591, 603 (1944); Bluefield Water

  Works and Improvement Co. v. Public Serv. Comm. of W. Va., 262 U.S. 679, 692-93

  (1923)) for determining a fair and reasonable allowed ROE, which include consistency of the allowed return with other businesses having similar risk and the adequacy of the return to provide access to capital markets and support credit quality, with the end result
- Q. Please discuss any factors that are particularly relevant to setting a reasonable ROE for NYPA's transmission system, compared to setting an ROE for an investor-owned utility ("IOU").

leading to reasonable rate levels for customers.

As a New York State authority, NYPA is a special-purpose government entity whose 16 A. mission is to provide clean, low-cost and reliable energy consistent with safety and a 17 clean environment, while promoting economic and job development, energy efficiency, 18 renewables and innovation for the benefit of its customers and all New Yorkers. NYPA 19 20 is just like an IOU when it comes to the need to establish its own credit rating and to access capital markets. NYPA receives no tax revenues or "credits" from New York 21 State. It finances its projects on its own with internally generated funds and bond sale 22 23 proceeds from private investors. As discussed in the testimony of Mr. Thomas A. Davis, NYPA's Vice President of Financial Planning (Exhibit No. PA-101), NYPA is 24

embarking on the upgrade and modernization of its transmission system and the
deployment of advanced technologies to enhance transmission grid intelligence. NYPA
does not have traditional common stock and its equity is retained income stated on its
financial statements as "net position." NYPA has its own bond rating, currently "AA"
with Standard & Poor's ("S&P") and "Aa1" with Moody's Investors Service
("Moody's"). NYPA's bonds are not guaranteed by the State of New York, which is also
rated "AA" by the major rating agencies. Accordingly, NYPA must provide its own
financial integrity through its own revenues. NYPA is a major state authority which has
about \$1.6 billion of debt outstanding and needs a substantial amount of new borrowing
to fulfill its mission before 2020. NYPA must keep a safety margin over and above its
interest costs, just like an IOU, in order to provide debt investors the assurance that they
will be paid principal and interest on a timely basis. NYPA's ROE, or return on its net
position, as well as its equity ratio, provide that safety margin needed to maintain its
financial integrity and bond rating. But unlike an IOU, NYPA pays neither income tax to
the Federal Government, nor to New York State. Thus, the equity portion of its overall
ROR, the ROE, is not "grossed up" for taxes, so the overall ROR of 7.49% produced by
the formula rate, as seen in Exhibit No. PA-303, p. 8, provides the entirety of NYPA's
transmission-related earnings that debt investors and bond rating firms will evaluate as
coverage for debt financing. In the case of an IOU on the other hand, part of the safety
margin evaluated by ratings agencies is provided by the income tax allowance, which is
an additional component of the revenue requirement and is included in the earnings
before interest, taxes, depreciation amortization metric utilized by some ratings agencies.

1	For IOUs, recovery of an income tax allowance "cushions" the impact of unexpected
2	expenses, and reduces risk for the business entity and its investors. For example, if a
3	taxable IOU has a marginal income tax rate of 35%, an unexpected operations &
4	maintenance cost increase of \$1 million only decreases the return by \$650,000, because
5	the tax allowance built into rates absorbs \$350,000 of the increased expense.

- 6 Q. Has FERC recognized that municipal or government-owned transmission systems have a similar investment risk as one owned by an IOU?
- Yes. In FERC Opinion No. 479, issued on April 19, 2005 and related orders involving the 8 A. 9 City of Vernon ("Vernon"), FERC stated that Vernon's ROE could be set by reference to 10 the market-based return for similarly-rated entities. See generally the discussion in City of Vernon, 111 FERC ¶ 61,092 at PP 84-103 (2005). FERC's finding comports with 11 financial theory. The risk of a particular investment is not determined by the type of 12 entity that makes the investment; rather, the risk is determined by the risk of the 13 14 particular investment. NYPA's business risk of developing and modernizing the New 15 York State transmission system is no different than that of an IOU. In the Midwest Independent System Operator, Inc. ("MISO"), municipal transmission owners are entitled 16 17 to earn the same 12.38% cost of "proprietary capital" as IOU transmission owners are entitled to earn as ROE. Midwest Indep. Transm. Sys. Operator, Inc., 100 FERC ¶ 18 61,292 (2002), reh'g denied, 102 FERC ¶ 61,143 (2003), on appeal, Public Serv. Comm. 19 of the C'wealth of Ky. v. FERC, 397 F.3d 1004 (D.C. Cir. 2005), on remand, 111 FERC ¶ 20 21 61,355 (2005).

### **Cost of Equity Determination**

- Q. In FERC Opinion No. 531, the Commission continues its reliance on the discounted cash flow ("DCF") method, with some refinements, to estimate the allowed rate of return on equity. Can you briefly explain the DCF method?
- 5 A. The DCF method to estimate the cost of equity is grounded on the truism that investors 6 price a stock based upon the present value of the stock's future cash flows, which
- translates into the present value of dividends and/or the stock's sale value into the infinite
- 8 time horizon. It is a particularly useful model for dividend-paying entities like IOUs,
- 9 where the current yield can be accurately estimated, and estimating investors' assessment
- of growth expectations can be reasonably determined from publicly available data.
- Public utilities are mostly regulated, and their earnings levels are constrained to
- reasonable levels, based upon the risks they undertake.
- The DCF formula is:
- 14 k = D/P + g
- Where: k =the estimate of investors' required return;
- D = the annual dividend (over the next 12 months and sometimes expressed as D1, estimated under the FERC method by increasing the average yield over the past six months, and increasing that yield by ½ the growth rate to arrive at the adjusted dividend yield);
- P = the stock price (in practice at FERC, the 6-month average of the high and low stock prices, each month) and;
- g = The expected growth rate of dividends per share (at FERC, the weighted average of IBES short-term 5-year growth (weighted  $2/3^{\text{rds}}$ ) and GDP for long-term growth (weighted  $1/3^{\text{rd}}$ )).
- Q. Can you explain how you developed the cost of equity of 9.34% for NYPA?
- A. Yes. I followed the new ROE methodology that FERC adopted in Opinion No. 531 in

Docket No. EL11-66-001 which was issued on June 19, 2014. The order stated at P 13,
"For the reasons discussed below, we find that the ROE in this proceeding, as well as in
future public utility cases, should be based on the same DCF methodology the
Commission has used in natural gas pipeline and oil pipeline cases for many years—the
two-step, constant growth DCF methodology, or two-step DCF methodology." I have
outlined the steps of the new method for electric utilities that were detailed in Opinion
No. 531 and included them in Exhibit No. PA-303, pp. 1-2. My initial screen to select a
proxy group involved reviewing S&P's and Moody's bond ratings for the universe of
over 40 electric utilities and diversified electric utilities to find entities with the highest
bond rating, which I found to be either "A-" or "A." Arriving at an adequate sized proxy
group required expanding the selection criteria to include utilities that had a rating of
"A-" or better from either Moody's or S&P, as long as their "Financial Strength" was
rated "A" by Value Line (Exhibit No. PA-303, p. 6). Value Line's Financial Strength
Rating was used as an additional screen because it involves an assessment of balance
sheet strength, leverage, business risk and cash flow and is a reasonable additional
screening criterion to establish a group to use to estimate NYPA's fair return on equity.
Given NYPA's "AA" bond rating, the addition of Value Line screening data fit within
the guidance of Opinion No. 531 because using Value Line, while not a FERC
requirement, is acceptable according to Opinion No. 531 at P 100. That screening
process resulted in the twelve highest-rated utilities which are shown in the Value Line

.

 $<sup>^1</sup>$  Martha Coakley, Mass. Atty. General, et al. v. Bangor Hydro-Elec. Co., et al., Opinion No. 531, 147 FERC ¶ 61,234 (issued June 19, 2014), order on paper hearing, Opinion No. 531-A, 149 FERC ¶ 61,032 (2014), order on reh'g, Opinion No. 531-B, 150 FERC ¶ 61,165 (2015).

reports included in Exhibit No. PA-307. After eliminating utilities involved in merger and acquisition activity (Nextera Energy, Wisconsin Energy, and Integrys Energy), the resulting group consisted of the nine utilities analyzed in Exhibit No. PA-303, p. 3, that are closest to NYPA's "AA" bond rating. Also, as is fundamental to the DCF method, all utilities needed to be paying dividends during the six-month study period. Using the resulting proxy group of nine utilities, I then followed the specific steps for estimating the ROE per Opinion No. 531.

### 8 Q. Please discuss the steps and resulting return on equity estimate.

A. Once the proxy group of nine utilities was selected, I gathered daily stock prices and dividend data over the 6-month period ended May 31, 2015. The stock price and dividend data are shown in Exhibit No. PA-308. Also, as indicated in Opinion No. 531 at PP 88-90, I used Yahoo Finance as a source for analysts' 5-year short-term growth IBES projections as of May 31, 2015, which is weighted 2/3<sup>rds</sup> to determine the DCF growth rate in accordance with Opinion No. 531. The analyst growth data source is shown in Exhibit No. PA-304. The long-term growth projection, based upon three data sources for GDP growth, were estimated based upon the best current information as shown in Exhibit No. PA-303, p. 5, and weighted 1/3<sup>rd</sup> to determine the DCF growth rate. Also, in accordance with the guidance in Opinion No. 531, the low-end outlier, Edison International, was eliminated from the array because its indicated DCF return of 4.56% fails any test of logic or reason. It is not only below the current cost of "A" or "AA" rated debt (4.26% and 4.00%, respectively) plus 100 basis points (see Exhibit No. PA-303, p.

11), but it is far out of the range of central tendency of the rest of the proxy group data. 1 Following the steps outlined in Opinion No. 531 and as summarized on Exhibit No. PA-2 3 303, pp. 1-2, the method produced a midpoint return on equity of 8.27%, and median return of 8.43%, and based upon the rationale in Opinion No. 531, the ROE, due to 4 abnormal market conditions, should be set at the average of the central tendency (which I 5 6 determined by averaging the median and midpoint) and the high end of the range of 9.34%, resulting in a base ROE of 8.85%. After including the 50 basis point incentive for 7 8 ISO/RTO participation, the estimated reasonable allowed ROE would be 9.35%, but the 9 ROE is capped at 9.34%, which is the high end of the range.

#### 10 Q. What is the purpose of Exhibit No. PA-303, p. 4?

- A. Exhibit No. PA-303, p. 4 is an analysis of the returns indicated for the proxy group by using a spot market price as of May 31, 2015. I included that analysis to see if there was a notable difference in the current market data compared to the 6-month period used following the FERC determinations in Opinion No. 531. I note that while the returns indicated are slightly higher, the difference is not a significant cause for concern.
- Q. Does your recommended return of 9.34%, after the 50 basis point incentive for ISO/RTO participation, provide a just and reasonable return sufficient to support NYPA's "AA" bond rating?
- Yes, but there is little margin for error. As discussed in Opinion No. 531, the overall goal of the allowed equity return is to meet the requirements of the *Hope* and *Bluefield* cases, which includes being fair to customers and at the same time maintaining the entity's financial integrity. I believe that considering the electric grid policy actions of the State

of New York and the need of NYPA's customers to access low-cost power, it is 1 beneficial for NYPA to maintain its "AA" bond rating. The 8.85% return for the 2 3 transmission system (9.34% with the ISO incentive) is reasonably close to the 9.4% ROE that NYPA earned in 2014 and the 8.69% ROE earned in the 2011-2014 timeframe, 4 which has produced a strong bond rating (See Exhibit No. PA-303, p. 10). It is 5 6 noteworthy also that the 8.69% average return over this time period was produced on a higher equity ratio (average 72%) than the 60% cap NYPA is voluntarily proposing in 7 8 this filing. Therefore, while the 9.34% ROE is higher than NYPA's average ROE of 9 8.69% over the 2011-2014 timeframe, the resulting overall return of 7.49% after the equity ratio limit does not provide a net increase in credit support compared to its 10 11 historical returns.

Q. Do current capital market conditions warrant an upward departure from the measure of central tendency consistent with Opinion No. 531?

12

13

14

15

16

17

18

19

20

21

22

A. Yes. The overall context for FERC's adjustment to move up from the measure of central tendency in Opinion No. 531 was that the resulting DCF returns produced by current market data did not provide a reasonable assurance that the financial integrity standards of *Hope* and *Bluefield* could be met. I have already indicated that I think it is beneficial to maintain NYPA's current bond rating. Capital market conditions for electric utility stocks are producing even lower DCF returns now than they produced when Opinion No. 531 was issued in June of 2014. In NYPA's situation, it has no access to new equity markets, because it is a state authority and does not have traditional "common stock." Its soul source of new financing is the cash flow from its retained earnings, depreciation and new

bond financing. As already discussed, its ability to maintain its bond rating is entirely
dependent on its equity return and the level of equity in its capital structure because it has
no income tax cushion like an IOU. Yet the transmission projects that NYPA undertakes
have a similar risk to those of an IOU. NYPA's need for a reasonable return on equity is
to maintain its financial integrity and ability to maintain its credit rating. A higher return
for NYPA is not a compromise between the interests of equity investors and customers.
All electricity consumers in the State are best served if NYPA maintains its credit rating,
and any funds provided by the cash flow from the equity return are simply reinvested in
New York State's energy infrastructure and programs. Therefore, in order to maintain the
financial integrity of NYPA, the procedure of setting the return at the average of the high
end of the range should be used for NYPA based upon current market conditions.

- Q. What specific factors indicate that based upon current capital market conditions,
   the base equity return for NYPA should be set at the average of central tendency
   (median/midpoint) and highpoint of the range?
- First, evidence of the current very low interest rates can be seen in Exhibit No. PA-303, A. p. 9, where the 30-year Treasury Bond average was approximately 3.00% for the 6-month period used to measure the market conditions in Opinion No 531, and the 30-year Treasury Bond average was only about 2.63% during the 6-month period used to measure the return for this filing. Second, the history of achieved ROEs of comparable entities as well as expected returns in the future are also relevant. As can be seen in Exhibit No. PA-303, p. 7, the proxy group achieved ROEs averaging 10.16% in 2014 and, on average, is expected to earn returns of 10.28% to 11.00% in the 2015 to 2020 time frame. Third,

allowed returns in the utility industry are generally higher than my recommended base 1 ROE of 8.85%. For example, as shown on Exhibit No. PA-303, p. 12, other electric and 2 3 gas utilities in New York State currently have ROEs in the range of 9.0% to 10.4% for rate plans now in effect. Additionally, on a national level, as shown in Exhibit No. PA-4 305, Regulatory Research Associates reports (on p. 3) average allowed returns of 9.47% 5 6 for gas utilities and 10.37% for electric utilities. The large spread between achieved 7 returns, expected future returns and recently allowed returns nationally versus the current 8 DCF results demonstrated here, further suggests that NYPA's return be set using the same upward adjustment (average of the central tendency and high end) that was decided 9 in Opinion No. 531. In other words, the same concerns about the results of the DCF that 10 11 existed in Opinion No. 531 are still present today.

Q. Does the 50 basis point incentive proposed by NYPA conform to precedent established by FERC in other proceedings?

12

13

14 Yes. Based on membership in an ISO/RTO, FERC has consistently granted utilities a 50 A. basis point upward adjustment to the base ROE in recognition of the region-wide benefits 15 16 of turning operational control over transmission facilities to an ISO and for the utility's 17 continued involvement with such organization. See, for example, Niagara Mohawk Power Corp., 124 FERC ¶ 61,106 at P 35 (2008), order on reh'g, 126 FERC ¶ 61,173 18 19 (2009). Also, the Commission has noted that the 50 basis point adder is subject to the zone of reasonableness as stated in Niagara Mohawk and in ISO New England, Inc., 106 20 FERC ¶ 61,280 at P 246 (2004). Application of a 50 basis point adder for NYPA's 21 continued participation in the New York Independent System Operator, Inc. is 22

appropriate here, but the total ROE would be capped at 9.34%, the top end of the range of results established from the proxy group.

#### Capital Structure

3

4

5

- Q. What is the capital structure that should be used to set NYPA's transmission revenue requirement?
- 6 Generally the capital structure of an entity with a formula rate varies from year-to-year as A. 7 its long-term capitalization ratio changes due to, for example, the issuance of additional 8 debt. NYPA's 2014 capital structure and its components are shown in the Formula Rate attached as Exhibit No. PA-202 and sponsored by NYPA witness Mr. Alan C. Heintz as 9 10 well as repeated in my Exhibit No. PA-303, p. 8. As shown, the formula contains a stated 11 cost of equity of 9.34%, a cost of debt of 4.72% based on 2014 data, and an actual yearend 2014 long-term debt-to-equity ratio of 23.6/76.4. This would produce an overall 12 13 ROR of 8.19%. However, the year-end 2014 debt ratio of 23.6% is anomalously low, 14 even in view of NYPA's conservative use of debt. NYPA does not ask to have its transmission revenue requirement set on a debt-to-equity ratio of 23.6/76.4. Instead, 15 16 NYPA proposes a capital structure that better reflects its long-term capitalization goals, 17 and better represents the debt/equity ratio that NYPA will achieve during the 18 transmission life extension and modernization program period which necessitates this Formula Rate filing. NYPA will target a more leveraged capital structure as its need to 19 access capital increases in the coming years, and therefore proposes to cap the equity 20 21 component of its capital structure produced by the Formula Rate at 60% equity. See, e.g., Transource Wisconsin, LLC, 149 FERC ¶ 61,180 at P 34 (2014) ("We note that the 22

1	Commission traditionally does not require applicants to cap the capital structures used for
2	ratemaking at a particular numerical value. Here, however, Transource Wisconsin has
3	voluntarily proposed to cap the equity component of its capital structure, and we accept
4	this voluntary cap.")

- 5 Q. Please clarify the equity ratio that is proposed for the ongoing formula rate updates?
- NYPA's proposal is to use the actual capital structure produced by the data inputs to the 7 A. 8 Formula Rate each year, subject to a voluntary cap of 60% equity. While the 60% equity ratio is below NYPA's actual equity ratio now, it is reasonably close to NYPA's long-9 term target ratio to maintain its bond rating and conservative debt structure. NYPA's 10 11 equity will decline from its current 77% level as it pursues an extensive capital spending program the requires debt financing of almost \$1.6 billion over the 2015-2019 time 12 frame, to finance part of a total capital program of about \$3 billion. If for some 13 14 unforeseen reason NYPA's equity ratio falls below 60%, then the lower actual equity 15 ratio produced by the Formula Rate will be used. That proposal assures that rates are not 16 set on an equity ratio that is higher than anticipated, and assures that ratepayers are 17 paying a return only on actual equity. Using 2014 data, capping the equity component of 18 the capital structure at 60% produces an overall ROR is 7.49% as seen in Exhibit No. PA-19 303, p. 8, and also shown in the exhibits of the aforementioned Mr. Thomas Davis of 20 NYPA.
  - Q. Would it be appropriate to cap the equity component of NYPA's capital structure at a number less than 60%?

21

22

A. No. NYPA is already proposing that rates be set on a lower equity ratio than its longterm goal of 65%, a goal recognized by the ratings agencies. This 60% limit is being

proposed on a voluntary basis in order to minimize the rate increases under the Formula

Rate during this period of capital spending. NYPA's conservative use of debt contributes

significantly to its strong credit profile, "AA" credit rating, and low cost of debt, and is

consistent with the expectations of NYPA's debt investors. The latest Moody's credit

report (Exhibit No. PA-306, p. 11) on NYPA states the following:

The financial flexibility provided by NYPA's strong balance sheet and debt service coverage ratios are a key factor in its Aa1 rating. Historically, NYPA pursued an aggressive debt-management strategy targeted at eliminating generation-related debt with the intent of lowering its fixed costs and thus its customers' power rates. As a result, it reduced outstanding revenue bond debt (including commercial paper notes) to about \$1.7 billion in 2013 from \$3.5 billion in 1994. This strategy has positioned NYPA well to implement its current large capital program, and as a result, total funded debt is expected to remain fairly constant at about \$1.7 billion. This is consistent with NYPA's goal of maintaining a ratio of 35% debt-to-capital (excluding capital leases).

Capping NYPA's equity capitalization at less than 60% fails to recognize that NYPA's effective overall rate of return is already much lower than an average IOU's effective rate of return when taxes are considered. Capping the equity ratio at less than 60% is also incongruous with the use of NYPA's actual cost of debt of 4.72% which is a result of its high bond rating, and in itself attributable to NYPA's low leverage capital structure. I would need to re-examine the proxy group used to determine the ROE in the event of a proposal to lower the equity ratio even further and include lower-rated entities in the proxy group for purposes of the DCF analysis.

1	Q.	Does NYPA require a greater degree of equity capitalization to achieve the same
2		credit rating as a comparable IOU?

3 A. Yes. A primary consideration of credit rating agencies in evaluating the credit rating of a 4 debt issuer is the safety margin over and above interest costs provided by earnings and 5 income taxes, and sometimes, other cash flow measures, such as depreciation and amortization. An IOU with an identical rate base and rate of return would have a higher 6 safety margin than NYPA because of the income tax allowance included in rates. By 7 increasing the higher-cost equity component of NYPA's capital structure relative to debt, 8 9 NYPA can achieve the same safety margin as an IOU without any added cost to 10 customers because NYPA does not recover an income tax allowance. Because typical public utilities earn a grossed up cost of equity, this makes 9.34% effectively cost about 11 12 14.4% at the Federal corporate income rate of 35%. However, the same 9.34% return for 13 NYPA is simply 9.34%. Thus, comparative data suggests that NYPA's "AA" bond rating, which is supported by its conservative use of debt and high rate of equity 14 capitalization, does not come at an increased cost to ratepayers compared to an IOU with 15 16 a lower credit rating and lesser degree of equity capitalization.

# Q. Are you, in essence, recommending that NYPA's overall allowed rate of return should be as high as the pre-tax rate of return for an IOU?

17

18

19

20

21

22

23

A.

No. NYPA's 2014 overall rate of return of 7.49% with the equity ratio capped at 60% is about 25% lower than the 10.07% effective overall return for a representative IOU's pretax return. As shown in Exhibit No. PA-303, p. 8, the capital structure example labeled, "Capital Structure of Lower Rated IOU Equity/Debt Cost Adjustment and Pre-tax Return Example" shows how income taxes increase the effective overall rate of return to 10.07%

that is included in the revenue requirement of an IOU with a more typical capital structure. The 60% equity ratio target is not intended as a surrogate to recover an income tax allowance. It is simply intended to represent NYPA's low case estimate of its actual equity ratio during this significant capital spending program and is actually a bit lower than the equity ratio debt-rating firms and debt investors would expect to see over the foreseeable future for NYPA. The proposed 60% cap also represents NYPA's low-end estimate of its future equity ratio, is consistent with FERC's practice of favoring actual capital structures, as well as FERC precedent supporting applicants' agreeing to voluntary equity ratio limits.

#### 10 Q. What additional reference material have you included in your exhibits?

- A. Exhibit No. PA-306 includes copies of the reports from both S&P's and Moody's for reference. I have included copies of both the S&P and Moody's reports because I referred to the ratings and quoted from the Moody's report. The Value Line reports I relied upon are shown in Exhibit No. PA-307, as I have referenced the data in these reports throughout my Exhibit No. PA-303.
- 16 Q. Does this conclude your testimony?
- 17 A. Yes, it does.

1

2

3

4

5

6

7

8

9

### UNITED STATES OF AMERICA **BEFORE THE** FEDERAL ENERGY REGULATORY COMMISSION

New York Power Authority		)	Docket No. ER15-	-000
	AFFIDAV	IT OF RICHA	RD L. ANSALDO	
State of New York		)		
County of Albany		)		
County of Albany		)		

I, Richard L. Ansaldo, being duly sworn, depose and say that the statements contained in the Prepared Direct Testimony of Richard L. Ansaldo served on behalf of the New York Power Authority in these proceedings are true and correct to the best of my knowledge, information and belief, and I hereby adopt said testimony as if given by me in formal hearing, under oath.

SUBSCRIBED AND SWORN to before me

This do day of June 2015

JESSICA L. BUCCIERO
Notary Public, State of New York
No. 01BU6205987
Qualified in Saratoga County
Commission Expires May 11,

Richard L. Ansaldo
P.O. Box 2542
Albany, NY 12220
518-527-8298
rickansaldo@yahoo.com
Resume

#### **Areas of Expertise and Specialization**

32 years of experience from September 1976 to October 2008 in regulating Electric, Gas, Telephone and Water utilities in increasingly responsible roles at the New York State Department of Public Service. For 26 of those years I was a Section Chief in the Office of Accounting and Finance. In that role I supervised financial analysts and accountants in the agency's role and jurisdiction over rates and service. Specific areas of expertise include financial analysis, revenue requirements, rate of return, economic studies, financing techniques, capital structure, financial integrity, regulatory policy, management, negotiations, and administrative rules and regulations.

Since 2008 I have been self-employed as an independent consultant providing advice and expertise on energy, conservation, utility, policy, and financial issues. My clients have included NRG Energy, Inc., Dynegy, Inc., Cable Telecommunications Association of New York, Municipal Electric Utilities Association of New York, and NYPA. I submitted rate of return testimony and exhibits in NYPA's 2012 filing before FERC to update its transmission revenue requirement in Docket No. ER12-2317-000.

#### **Relevant Experience**

- Chief, Office of Accounting and Finance for the New York State Department of Public Service, 1992 2008. Senior policy and technical advisor to the Commission on electric, gas, telephone, and water matters, and shared administrative responsibilities for Office of Accounting and Finance. Responsibilities included regulatory and competitive policy development and implementation, overseeing rate proceedings and ratemaking, review corporate financial planning, reviewing and advising on utility financial plans, reviewing mergers and acquisitions and intervention in FERC gas proceedings. Developed a training program for Staff development in rate cases.
- Chief of Utility Financing in the Office of Accounting and Finance for the New York State Department of Public Service, 1982 1992. Senior policy and technical advisor to the Commission on electric, gas, telephone, and water matters, focusing on financial issues and shared administrative responsibilities for Office of Accounting and Finance.
- National Association of Regulatory Utility Commissioners (NARUC), 1984 1990. Directed the expansion of Finance Section and served as Chairman to NARUC Subcommittee on

Finance from 1984 to 1986 and Co-chair of the merged Subcommittee on Finance and Economics from 1986 – 1990.

- Progressed from Senior Accountant to Principal Financial Analyst in the Office or Accounting and Finance for the New York State Department of Public Service from 1976 to 1982. In that role testified in numerous rate proceedings involving electric, gas, telephone and water utilities and analyzed numerous financing petitions.
- From 1972 1976 was at the General Electric Company in the Financial Management Training Program and then served in account and auditing positions at the New York State Department of Labor.

#### **Specific Expertise Developed At The New York Commission**

- Testified in over 45 proceeding involving issues of rates, emergency rates, plant phaseins, steam system abandonment, coal conversion, long-term rate plans and cash management.
- Testified before the New York Commission, FERC, and The Connecticut Department of Utility Control.
- Developed and reviewed revenue requirements for utility rate cases.
- Developed discount rates to perform strategic analysis on plans to continue nuclear plant completion and to evaluate conservation programs for demand side management.
- Assisted Administrative Law Judges in developing recommendations in cases to be presented to the Commission.
- Made presentations to the Commission on a multitude of issues involving rates, finances and policy and advised Commissioners on pending decisions.
- Acquired special expertise in negotiations through experience and academic training program by Harvard University professors based upon the book "Getting to Yes."
- Developed "milestone" criteria for honoring power purchase contracts during the 1980s and 1990s.
- Developed protections against holding company abuses which have become policy at the New York Department of Public Service.
- Developed techniques for removing the impact of non-earning assets from Holdco financial statements so that utility rates would not be increased by Holdco activities.
- Advised the Receiver for a utility in bankruptcy, leading to the successful continuation of utility service after a successful auction of the troubled utility.

### **Utilities Covered**

Consolidated Edison Company of New York, Inc.

Orange and Rockland Utilities, Inc.

Central Hudson Gas & Electric Corporation

Niagara Mohawk Power Corporation (now National Grid)

New York State Electric & Gas Corporation

Rochester Gas and Electric Corporation

National Fuel Gas

Long Island Lighting Company (now Long Island Power Authority, aka LIPA)

Keyspan Gas Properties (now National Grid) Corning Natural Gas All Major Water Utilities All Telephone Companies including NYNEX (now Verizon)

### **Education**

BS Degree in Accounting and Business Administration, and Graduate Certificate in Regulatory Economics, State University of New York at Albany

### New York Power Authority, FERC Proxy Group Method/Notes

- 1. FERC's new ROE methodology for electric utilities was set forth in Docket No. EL11-66-001, Opinion No. 531, issued on June 19, 2014. FERC's opinion stated at P 13, "For the reasons discussed below, we find that the ROE in this proceeding, as well as in future public utility cases, should be based on the same DCF methodology the Commission has used in natural gas pipeline and oil pipeline cases for many years—the two-step, constant growth DCF methodology, or two-step DCF methodology."
- 2. Proxy group selection began by including the twelve highest-rated electric utilities which were the closest to NYPA's AA bond rating. The credit screen test was affirmed by FERC at PP 106-07 of Opinion No. 531 and the use of a national proxy group (as opposed to a regional proxy group) was needed to get a reasonably sized proxy group, and is supported by FERC's opinion at P 96. The selection of the proxy group referenced both S&P and Moody's bond ratings because the highest-rated IOUs had ratings from both of the major rating agencies. Due to the inadequate size of the proxy group that would have resulted from requiring an A- rating or higher from both rating agencies, the proxy group includes electric utilities with a rating of A- from either Moody's or S&P, as long as the utilities have a financial strength rating from Value Line of A (see p. 6 of this exhibit). In accordance with Opinion No. 531 at P 114 and the FERC precedent cited therein, companies involved in merger and acquisition activity were eliminated.
- 3. To arrive at the DCF growth rate, the IBES 5-year future analyst estimate was weighted 2/3<sup>rds</sup> and added to the GDP deflator (weighted 1/3<sup>rd</sup>), as discussed in Opinion No. 531 at PP 39, 88-90.
- 4. The dividend yield was calculated in accordance with Opinion No. 531 at P 77, using a three-step process: "(1) averaging the high and low stock prices as reported by the New York Stock Exchange or NASDAQ for each of the six months in the study period; (2) dividing the company's indicated annual dividend for each of those months by its average stock price for each month (resulting in a monthly dividend yield for each month of the study period); and (3) averaging those monthly dividend yields."
- 5. FERC's "adjusted dividend yield" was then calculated by increasing the dividend yield as calculated in 4. above by a factor of 1 plus 1/2 the weighted DCF growth rate as in past FERC practice and referenced at P 15 of Opinion No. 531. This conforms the calculation to estimate the investors' expectations of the average dividend over the next 12 months, to be consistent with DCF theory.

- 6. A low-end outlier, Edison International, was excluded from the group because the indicated ROE was unreasonably low (too close to the bond cost; see p. 11) in accordance with FERC precedent and guidance. Opinion No. 531 at PP 122-23. The DCF ROE is not only less than 100 basis points above its bond yield, but the return also fails to pass any notion of central tendency or norm of the rest of the proxy group.
- 7. The dividend yield and growth rate statistics were then added together to arrive as the total DCF cost of equity estimate. The midpoint or the array was then calculated by averaging the high and low end of the range as indicated at P 142 of Opinion No. 531 and based upon the current capital market condition we the midpoint was averaged with the highpoint of the range to arrive at our requested return on equity.
- 8. Averaging the midpoint and highpoint of the range is justified under current market conditions because the DCF returns are anomalously low at this time and setting the return at the midpoint does not reasonably meet the standards of *Hope* and *Bluefield*. Current interest rates are even lower than were referenced in Opinion No. 531 as evidenced by Treasury Bond rates (p. 9), and utility stock prices are higher, reflected in lower dividend yields. The resulting return following Opinion No. 531 with the adjustment to the average of the central tendency measures and highpoint is only 8.85%, which is significantly lower than the 10.57% return arrived at in Opinion No. 531. The midpoint return in the proxy analysis here of 8.27% is also significantly lower than the midpoint return arrived at in Opinion No. 531 of 9.39%, as well as much lower than the predicted achieved returns of the companies in the proxy group (p. 7).

#### Exhibit No. PA-303 Contents:

- Pages 1 and 2, notes on FERC Opinion No. 531 method
- Page 3, Summary of Proxy Group Return
- Page 4, Check of Exhibit No. PA-303, p. 3 results using spot stock (one day) prices at end of the 6-month period
- Page 5, GDP Growth Rate estimates
- Page 6, Proxy Group Credit Screen
- Page 7, Proxy Group Betas and ROEs Expected and Earned
- Page 8, Comparison of Overall Rate of Return with Various Capital Structures
- Page 9, Treasury Bond Yields from Opinion No. 531 and after
- Page 10, NYPA Historical Earnings
- Page 11, U.S. Corporate Bonds Yields
- Page 12, NYS Allowed ROEs

Exhibit No. PA-303, Page 3 of 12

## **9 Company Proxy Group DCF Summary**

		Comp	uiij 110	Ay Grou	p D CI Sun	iiiiiai y			
	IBES 5 year	GDD	WTD Growth	Dividend Multiplier					
Proxy Electric	Growth %	GDP Deflator	% 2/3 IBES, 1/3	1 plus 1/2 wtd	12/1/2014 to 5/31/2015	Adjusted	<b>Total DCF</b>		
Company	5/31/2015	%	GDP	Growth	Avg Yield %	Yield %	Return %		
Allete Inc	6.00	4.35	5.45	1.0273	3.79	3.89	9.34		
Alliant Energy	5.45	4.35	5.08	1.0254	3.36	3.45	8.53		
Con Edison	2.48	4.35	3.10	1.0155	4.06	4.12	7.23		
Duke Energy	4.49	4.35	4.44	1.0222	3.98	4.07	8.51		
Edison Intern'l	0.70	4.35	1.92	1.0096	2.62	2.65	4.56		
OGE Energy	4.00	4.35	4.12	1.0206	3.01	3.07	7.19		
Pinnacle West	4.70	4.35	4.58	1.0229	3.68	3.76	8.35		
Southern Co.	3.32	4.35	3.66	1.0183	4.55	4.63	8.30		
Vectren Corp.	5.50	4.35	5.12	1.0256	3.40	3.49	8.60		
Zone of									
Reasonableness							9.34 to 7.19		
Midpoint							8.27		
Median							8.43		
Avg of Midpoint and Top of Zone									
Avg of Midpoint and Top of Zone  Avg of Median and Top of Zone  8.8									
Avg of Central Measures 8.									
ROE w/NYISO 50bp Incentive/Limit Top of Zone 9.34									

<sup>4.56%</sup> DCF Return For Edison Internat'l eliminated as low-end outlier per FERC precedent, Opinion No. 531 at PP 122-23.

# Exhibit No. PA-303, Page 4 of 12

### 9 Company Proxy Group DCF at 5/31/2015 Spot Price

	IBES 5 year Growth		WTD Growth % 2/3 IBES,	Dividend Multiplier 1 plus 1/2	Current \$	Dividend \$ Over	\$ Spot	Spot	
Proxy Electric Company	% 5/31/2015	GDP % Deflator	1/3 GDP	wtd Growth	Dividend 5/31/2015	Next 12 Months	Price 5/31/2015	Yield %	Total DCF Return %
Allete Inc	6.00	4.35	5.45	1.0273	2.02	2.075	50.35	4.01	9.46
Alliant Energy	5.45	4.35	5.08	1.0273	2.02	2.256	61.30	3.59	8.67
Con Edison	2.48	4.35	3.10	1.0254	2.60	2.640	61.84	4.20	7.31
Duke Energy	4.49	4.35	4.44	1.0222	3.18	3.251	75.73	4.20	8.64
Edison Intern'l	0.70	4.35	1.92	1.0096	1.67	1.686	60.81	2.75	4.66
OGE Energy	4.00	4.35	4.12	1.0206	1.00	1.021	31.50	3.17	7.29
Pinnacle West	4.70	4.35	4.58	1.0229	2.38	2.435	60.92	3.91	8.49
Southern Co.	3.32	4.35	3.66	1.0183	2.17	2.210	43.69	4.97	8.63
Vectren Corp.	5.50	4.35	5.12	1.0256	1.52	1.559	42.57	3.57	8.69
Zone of Reasonableness									7.29 to 9.46
Midpoint									8.38
Median									8.64
Avg Midpoint and To	p of Zone								<u>8.92</u>
Avg Median and Top	of Zone								<u>9.05</u>

<sup>4.66%</sup> DCF Return For Edison Internat'l eliminated as low-end outlier per FERC precedent, Opinion No. 531 at PP 122-23.

# Exhibit No. PA-303, Page 5 of 12

### Long-Term U.S. Gross Domestic (GDP) Growth Estimates For The Fourth Quarter of 2014

Source	Year Beginning	Nominal GDP (\$Billion)	Year Ending	Nominal GDP (\$Billion)	Annual GDP Growth (%)
HIS (1)	2019	21850	2044	63879	4.38%
EIA (2)	2020	22760	2040	51732	4.19%
SSA (3)	2020	23,694	2070	211,004	4.47%
					4.35%

<sup>(1)</sup> IHS Global Insight: Long-Term Macro Forecast - Baseline (U.S. Economy 30-Year Focus, Fourth Quarter (December 08, 2014), Table Summary 1(a), http://www.ihs.com/index.aspx

(2) Based on Data from EIA 2015 Annual Energy Outlook. <a href="http://www.eia.gov/forecasts/aeo/pdf/tbla20.pdf">http://www.eia.gov/forecasts/aeo/pdf/tbla20.pdf</a>

	EIA Chain					
Type Price						
Year	Index	Real GDP				
2020	1.211	18801				
2040	1.730	29898				

(3) Based on SSA 2014 OASDI Report

http://www.ssa.gov/oact/tr/2014/VI\_G2\_OASDHI\_GDP.html#200732

GDP 2070 221157

Exhibit No. PA-303, Page 6 of 12

### 9 Company Proxy Group Credit Screen and Value Line Safety Rank and ROEs

Proxy Electric Company	Value Line Financial Strength	S&P Bond Rating	Moody's Bond Rating	Stock Sym.	Value Line 2015 ROE %	Value Line 2016 ROE %	Value Line 2018-20 ROE %
Allete Inc	A	BBB+	A3	ALE	8.00	8.50	9.50
Alliant Energy	A	A-	A3	LNT	11.50	11.50	12.00
Con Edison	A+	A-	A3	ED	9.00	9.00	9.00
Duke Energy	A	A-	A3	DUK	8.00	8.00	8.00
Edison Intern'l	A	BBB+	A3	EIX	10.50	11.00	11.50
OGE Energy	A+	A-	A3	OGE	11.00	11.00	11.00
Pinnacle West	A+	A-	Baa1	PNW	9.50	9.50	9.50
Southern Co.	A	A	Baa1	SO	12.50	12.50	13.50
Vectren Corp.	A	A-	A2	VVC	12.50	13.00	15.00
Mean					<u>10.28</u>	<u>10.44</u>	<u>11.00</u>

Source: Latest Value Line reports as of 6/1/2015

Exhibit No. PA-303, Page 7 of 12

### 9 Company Proxy Group Betas and ROEs Expected and Earned

Proxy Electric Company	Value Line Beta	Value Line 2014 ROE %	Value Line 2015 ROE %	Value Line 2016 ROE %	Value Line 2018-20 ROE %
Allete Inc	0.80	7.80	8.00	8.50	9.50
Alliant Energy	0.80	10.90	11.50	11.50	12.00
Con Edison	0.60	8.50	9.00	9.00	9.00
Duke Energy	0.60	7.20	8.00	8.00	8.00
Edison Intern'l	0.75	13.00	10.50	11.00	11.50
OGE Energy	0.90	12.00	11.00	11.00	11.00
Pinnacle West	0.70	9.10	9.50	9.50	9.50
Southern Co.	0.60	12.50	12.50	12.50	13.50
Vectren Corp.	0.80	10.40	12.50	13.00	15.00
Mean	<u>0.73</u>	<u>10.16</u>	<u>10.28</u>	<u>10.44</u>	<u>11.00</u>

Source: Latest Value Line reports as of 6/1/2015

# Exhibit No. PA-303, Page 8 of 12

### **Comparison Of Overall Rate Of Returns With Various Capital Structures**

### Actual Capital 2014 Structure

### Requested Capital Structure

2014 Actual		Long Term					
Capital			Weighted	Capital			Weighted
Structure	Percent	Cost %	Cost	Structure	Percent	Cost	Cost
Debt	23.60	4.72	1.11	Debt	40.00	4.72	1.89
Equity	<u>76.40</u>	9.34	<u>7.14</u>	Equity	<u>60.00</u>	9.34	<u>5.60</u>
Overall ROR	<u>100.00</u>		<u>8.25</u>	Overall ROR	<u>100.00</u>		<u>7.49</u>

### Capital Structure Of Lower Rated Entity/Cost Rate Adjustment

#### 50 basis Capital **Point** Structure of Addition **Lower Rated** To Cost Weighted **Entity Rates** Cost Percent 5.22 Debt 47 2.45 9.84 Equity <u>53</u> <u>5.22</u> Overall ROR 100 **7.67**

### Capital Structure Of Lower Rated IOU Equity/Debt Cost Adjustment and Pre-tax Return Example

Capital Structure of Lower Rated Entity	Percent	50 basis Point Addition To Debt Cost	Weighted Cost
Debt	47	5.22	2.45
Equity	<u>53</u>	14.37	<u>7.62</u>
Overall ROR	<u>100</u>		<u>10.07</u>

14.37% pre-tax = 9.34%/.65 (Note: .65 reflects gross-up for 35% tax rate)

Exhibit No. PA-303, Page 9 of 12 Treasury Yields During And After Opinion No. 531 Issuance

Date	10 Yr	20 Yr	30 Yr	Date	10 Yr	20 Yr	30 Yr
10/31/2012	1.72	2.46	2.85	12/31/2014	2.17	2.47	2.75
11/30/2012	1.62	2.37	2.81	1/30/2015	1.68	2.04	2.25
12/31/2012	1.78	2.54	2.95	2/27/2015	2.00	2.38	2.60
1/31/2013	2.02	2.79	3.17	3/31/2015	1.94	2.31	2.54
2/28/2013	1.89	2.71	3.10	4/30/2015	2.05	2.49	2.75
3/28/2013	1.87	2.71	3.10	5/29/2015	2.12	2.63	2.88
Opinion NO. 531 Time Period	1.82	2.60	3.00	Averages For NYPA Formula Rate Filing	1.99	2.39	2.63
4/30/2013	1.70	2.49	2.88	1/30/2014	2.72	3.40	3.65
5/31/2013	2.16	2.95	3.30	2/28/2014	2.66	3.31	3.59
6/28/2013	2.52	3.22	3.52	3/31/2014	2.73	3.31	3.56
7/31/2013	2.60	3.34	3.64	4/30/2014	2.67	3.22	3.47
8/30/2013	2.78	3.46	3.70	5/30/2014	2.48	3.05	3.33
9/30/2013	2.64	3.41	3.69	6/30/2014	2.53	3.08	3.34
10/31/2013	2.57	3.33	3.63	7/31/2014	2.58	3.07	3.32
11/29/2013	2.75	3.54	3.82	8/29/2014	2.35	2.83	3.09
12/31/2013	3.04	3.72	3.96	9/30/2014	2.52	2.98	3.21
2013 Averages	2.53	3.27	3.57	10/31/2014	2.35	2.81	3.07
				2014 Averages	2.56	3.11	3.36

Source: www.treasury.gov

Exhibit No. PA-303, Page 10 of 12

### **New York Power Authority Historical Earnings**

	2014	2013	2012	2011
Net Position 1/1	3,719	3,470	3,295	3,001
Net Position 12/31	<u>3,991</u>	<u>3,719</u>	<u>3,470</u>	3,295
Average Net Position	<u>3,855</u>	<u>3,595</u>	<u>3,383</u>	<u>3,148</u>
Net Income	272	228	175	235
Contribution To NYS	<u>90</u>	<u>65</u>	<u>85</u>	<u>65</u>
Total Earnings	<u>362</u>	<u>293</u>	<u>260</u>	<u>300</u>
Earnings/Avg. Net Position	<u>9.39%</u>	<u>8.15%</u>	<u>7.69 %</u>	<u>9.53%</u>
		4 year Avg.= 8	.69%	
Equity Ratio %	76.0	73.6	71.0	67.4
		4 year Avg.=	72%	
Long Term Debt 1/1	1,241	1,335	1,434	1,618
Long Term Debt 12/31	1,189		1,335	1,434
	1.109	<u>1,241</u>	1 ) . ) . )	1.7.7

Source: NYPA Annual Reports

Exhibit No. PA-303, Page 11 of 12

US Corporate Bonds (08:59 ET June 8, 2015)

	I			• • • •		- /
Maturity	Yield	Yesterday	Last Week	<b>Last Month</b>	<b>Yield Change</b>	e Spread
2yr AA	0.99	0.99	0.91	0.80	0.00	0.32
2yr A	1.22	1.21	1.14	0.97	0.00	0.55
5yr AAA	1.96	1.97	1.80	1.73	0.00	0.27
5yr AA	2.21	2.22	2.02	1.87	0.00	0.52
5yr A	2.45	2.46	2.28	2.13	0.00	0.76
10yr AAA	2.98	2.98	2.79	2.76	0.00	0.62
10yr AA	3.26	3.27	3.07	2.96	0.00	0.90
10yr A	3.45	3.46	3.24	3.12	0.00	1.09
20yr AAA	3.87	3.88	3.75	3.61	0.00	-
20yr AA	4.10	4.09	4.00	3.92	0.00	-
20yr A	4.37	4.36	<mark>4.26</mark>	4.10	0.00	-

Source: www.bondsonline.com

# Exhibit No. PA-303, Page 12 of 12

## **Current Status of NYS Utility Rate Plans**

Company	<b>ROE Approved</b>	<b>Decision Date</b>
Central Hudson – Electric (pending)	9.00%	Jun-15
Central Hudson – Gas (pending)	9.00%	Jun-15
Con Edison - Electric (pending)	9.00%	Jun-15
Con Edison - Gas	9.30%	Feb-14
Con Edison – Steam	9.30%	Feb-14
KEDNY - Gas	9.40%	Jun-13
KEDLI - Gas	9.80%	Dec-07
NFG - Gas	9.10%	May-14
NYSEG – Electric	10.00%	Sep-10
NYSEG - Gas	10.00%	Sep-10
Niagara Mohawk – Electric	9.30%	Mar-13
Niagara Mohawk – Gas	9.30%	Mar-13
Orange & Rockland – Electric	9.4%/9.5%/9.6%	Jun-12
Orange & Rockland – Gas	10.40%	Oct-09
RG&E – Electric	10.00%	Sep-10
RG&E - Gas	10.00%	Sep-10
Total		

ROE Range, 9.00% to 10.40%

ROE Range 2014-15. 9.00 to 9.30

### IBES Growth Rates From Yahoo Finance 5/31/2015 (Next 5 years Per Annum) FERC Method

<b>Growth Est</b>	ALE	Industry	Sector	S&P 500
Current Qtr.	10.90%	-4.50%	94.80%	10.60%
Next Qtr.	2.10%	11.30%	78.30%	8.80%
This Year	4.70%	8.90%	17.20%	1.60%
Next Year	8.00%	6.60%	2.60%	12.20%
Past 5 Years (per annum)	7.72%	N/A	N/A	N/A
Next 5 Years (per annum)	6.00%	8.59%	8.94%	7.26%
Price/Earnings (avg. for comparison categories)	16.02	20.23	19.70	20.11
PEG Ratio (avg. for comparison categories)	2.67	4.40	-4.17	0.08
<b>Current Dividend</b>	2.02			
<b>Growth Est</b>		LNT	ED	DUK
Current Qtr.		8.90%	-3.10%	-7.20%
Next Qtr.		15.00%	2.70%	9.30%
This Year		4.00%	2.30%	2.60%
Next Year		5.50%	0.50%	6.00%
Past 5 Years (per annum)		7.92%	3.39%	1.58%
Next 5 Years (per annum)		5.45%	2.48%	4.49%
Price/Earnings (avg. for comparison categories)		16.98	15.53	16.26
PEG Ratio (avg. for comparison categories)		3.12	6.26	3.62
<b>Current Dividend</b>		2.20	2.60	3.18

# Exhibit No. PA-304, page 2 of 2

Growth Est	OGE	EIX	PNW
Current Qtr.	-6.00%	-29.00%	5.00%
Next Qtr.	-1.10%	-21.10%	2.70%
This Year	-6.10%	-21.60%	7.50%
Next Year	8.60%	8.30%	4.70%
Past 5 Years (per annum)	6.38%	10.13%	-3.54%
Next 5 Years (per annum)	4.00%	0.70%	4.70%
Price/Earnings (avg. for comparison categories)	16.95	16.96	15.89
PEG Ratio (avg. for comparison			
categories)	4.24	24.23	3.38
Current Dividend	1.00	1.67	2.38
<b>Growth Est</b>	SO	VVC	
Current Qtr.	1.50%	10.80%	
Next Qtr.	2.80%	3.30%	
This Year	1.40%	8.30%	
Next Year	3.50%	6.90%	
Past 5 Years (per annum)	3.83%	15.42%	
Next 5 Years (per annum)	3.32%	5.50%	
Price/Earnings (avg. for comparison categories)	15.32	17.32	
PEG Ratio (avg. for comparison categories)	4.61	3.15	
Current Dividend	2.17	1.52	



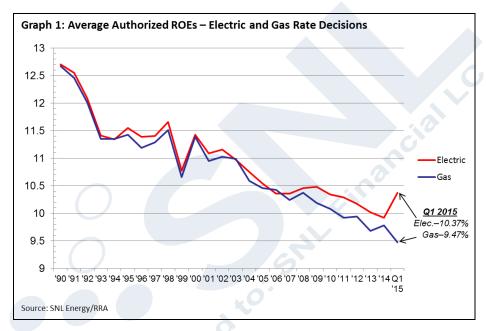
# Regulatory Research Associates

# **REGULATORY FOCUS**

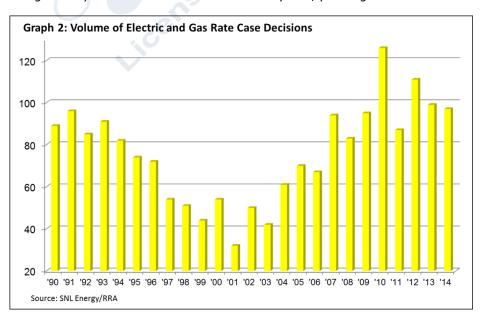
April 13, 2015

#### MAJOR RATE CASE DECISIONS--January-March 2015

The average return on equity (ROE) authorized <u>electric</u> utilities was 10.37% in the first quarter of 2015, compared to 9.91% in calendar-2014. There were nine electric ROE determinations for the first three months of 2015, versus 38 in all of 2014. We note that the data includes several surcharge/rider generation cases in Virginia that incorporate plant-specific ROE premiums. Virginia statutes authorize the State Corporation Commission to approve ROE premiums of up to 200 basis points for certain generation projects (see the <u>Virginia Commission Profile</u>). Excluding these Virginia surcharge/rider generation cases from the data, the average authorized electric ROE was 9.67% in the first quarter of 2015 versus 9.76% in 2014. The average ROE authorized <u>gas</u> utilities was 9.47% for the first three months in 2015 compared to 9.78% in calendar-2014. There were three gas cases that included an ROE determination in the first quarter of 2015, versus 26 in 2014. The 2014 averages do not include a Feb. 20, 2014 New York Public Service Commission steam rate decision for Consolidated Edison Co. of New York that adopted a 9.3% ROE. (We note that this report utilizes the simple mean for the return averages.)



As shown in Graph 2 below, after reaching a low in the early-2000s, the number of rate case decisions for energy companies generally increased for the next several years, peaking in 2010 at more than 125 cases.



Since 2010, the number of cases has moderated somewhat but has approximated 100 in three of the last four calendar years. There were 98 electric and gas rate cases resolved in 2014 versus 99 in 2013, 111 in 2012, and 87 back in 2011. There are currently about 50 electric and gas rate cases pending nationwide, indicating a somewhat more modest level of activity in 2015, but this level of activity remains robust when compared to the late-1990s/early-2000s. Increased costs for environmental compliance, generation and delivery infrastructure upgrades and expansion, renewable generation mandates, and employee benefits argue for the continuation of an active rate case agenda over the next few years.

As a result of electric industry restructuring, certain states unbundled electric rates and implemented retail competition for generation. Commissions in those states now have jurisdiction only over the revenue requirement and return parameters for delivery operations (which we footnote in our chronology beginning on page 5), thus complicating historical data comparability. We note that despite the heightened business risk associated with the less-than-robust economy, average authorized ROEs have declined modestly since 2008. We also note the increased utilization of limited issue rider proceedings that allow utilities to recover certain costs outside of a general rate case and that typically incorporate previously-determined return parameters.

The table on page 3 shows the average ROE authorized in major electric and gas rate decisions annually since 1990, and by quarter since 2010, followed by the number of observations in each period. The tables on page 4 indicate the composite electric and gas industry data for all major cases summarized annually since 2001 and by quarter for the past nine quarters. The individual electric and gas cases decided in the first quarter of 2015 are listed on pages 5-6, with the decision date shown first, followed by the company name, the abbreviation for the state issuing the decision, the authorized rate of return (ROR), ROE, and percentage of common equity in the adopted capital structure. Next we indicate the month and year in which the adopted test year ended, whether the commission utilized an average or a year-end rate base, and the amount of the permanent rate change authorized. The dollar amounts represent the permanent rate change ordered at the time decisions were rendered. Fuel adjustment clause rate changes are not reflected in this study.

Please note: Historical data provided in this report may not match data provided on RRA's website due to certain differences in presentation.

#### **Dennis Sperduto**

©2015, Regulatory Research Associates, Inc. All Rights Reserved. Confidential Subject Matter. WARNING! This report contains copyrighted subject matter and confidential information owned solely by Regulatory Research Associates, Inc. ("RRA"). Reproduction, distribution or use of this report in violation of this license constitutes copyright infringement in violation of federal and state law. RRA hereby provides consent to use the "email this story" feature to redistribute articles within the subscriber's company. Although the information in this report has been obtained from sources that RRA believes to be reliable, RRA does not guarantee its accuracy.

RRA-REGULATORY FOCUS

#### **Average Equity Returns Authorized January 1990 - March 2015**

		Electric U	<b>Jtilities</b>	Gas Utilities
Year	Period	ROE % (	# Cases)	ROE % (# Cases)
1990	Full Year	12.70	(44)	12.67 (31)
1991	Full Year	12.55	(45)	12.46 (35)
1992	Full Year	12.09	(48)	12.01 (29)
1993	Full Year	11.41	(32)	11.35 (45)
1994	Full Year	11.34	(31)	11.35 (28)
1995	Full Year	11.55	(33)	11.43 (16)
1996	Full Year	11.39	(22)	11.19 (20)
1997	Full Year	11.40	(11)	11.29 (13)
1998	Full Year	11.66	(10)	11.51 (10)
1999	Full Year	10.77	(20)	10.66 (9)
2000	Full Year	11.43	(12)	11.39 (12)
2001	Full Year	11.09	(18)	10.95 (7)
2002	Full Year	11.16	(22)	11.03 (21)
2003	Full Year	10.97	(22)	10.99 (25)
2004	Full Year	10.75	(19)	10.59 (20)
2005	Full Year	10.54	(29)	10.46 (26)
2006	Full Year	10.36	(26)	10.43 (16)
2007	Full Year	10.36	(39)	10.24 (37)
2008	Full Year	10.46	(37)	10.37 (30)
2009	Full Year	10.48	(39)	10.19 (29)
			4.=-	
	1st Quarter	10.66	(17)	10.24 (9)
	2nd Quarter	10.08	(14)	9.99 (11)
	3rd Quarter	10.26	(11)	9.93 (4)
2010	4th Quarter	10.30	(17)	10.09 (12)
2010	Full Year	10.34	(59)	<b>10.08</b> (37)
	1st Quarter	10.32	(12)	10.10 (5)
	2nd Quarter	10.32	(13)	10.10 (5) 9.88 (5)
	3rd Quarter	10.12	(10)	9.65 (2)
	4th Quarter	10.34	(8) (11)	9.88 (4)
2011	Full Year	10.29	(42)	9.92 (16)
2011	run real	10.23	(42)	<b>5.52</b> (10)
	1st Quarter	10.84	(12)	9.63 (5)
	2nd Quarter	9.92	(13)	9.83 (8)
	3rd Quarter	9.78	(8)	9.75 (1)
	4th Quarter	10.10	(25)	10.07 (21)
2012	Full Year	10.17	(58)	<b>9.94</b> (35)
			,	,
	1st Quarter	10.24	(15)	9.57 (3)
	2nd Quarter	9.84	(7)	9.47 (6)
	3rd Quarter	10.06	(7)	9.60 (1)
	4th Quarter	9.90	(21)	9.83 (11)
2013	Full Year	10.02	(50)	<b>9.68</b> (21)
	1st Quarter	10.23	(8)	9.54 (6)
	2nd Quarter	9.83	(5)	9.84 (8)
	3rd Quarter	9.87	(12)	9.45 (6)
	4th Quarter	9.78	(13)	10.28 (6)
2014	Full Year	9.91	(38)	9.78 (26)
2015	4.6	40.55	(0)	0.47 (2)
2015	1st Quarter	10.37	(9)	<b>9.47</b> (3)

April 13, 2015

RRA-REGULATORY FOCUS -4-

#### **Electric Utilities--Summary Table**

			LICCU	ic ounties3	ummary i				
	Eq. as %							Amt.	
	<u>Period</u>	<u>ROR % (</u>	# Cases)	<u>ROE %</u> (	# Cases)	Cap. Struc. (	# Cases)	<u>\$ Mil.</u> (	# Cases)
2001	Full Year	8.93	(15)	11.09	(18)	47.20	(13)	14.2	(21)
2002	Full Year	8.72	(20)	11.16	(22)	46.27	(19)	-475.4	(24)
2003	Full Year	8.86	(20)	10.97	(22)	49.41	(19)	313.8	(12)
2004	Full Year	8.44	(18)	10.75	(19)	46.84	(17)	1,091.5	(30)
2005	Full Year	8.30	(26)	10.54	(29)	46.73	(27)	1,373.7	(36)
2006	Full Year	8.24	(24)	10.36	(26)	48.67	(23)	1,465.0	(42)
2007	Full Year	8.22	(38)	10.36	(39)	48.01	(37)	1,401.9	(46)
2008	Full Year	8.25	(35)	10.46	(37)	48.41	(33)	2,899.4	(42)
2009	Full Year	8.23	(38)	10.48	(39)	48.61	(37)	4,192.3	(58)
2010	Full Year	7.99	(59)	10.34	(59)	48.45	(54)	5,567.7	(77)
2011	Full Year	8.00	(43)	10.29	(42)	48.26	(42)	2,853.5	(56)
2012	Full Year	7.95	(51)	10.17	(58)	50.55	(52)	3,131.5	(70)
	1st Quarter	7.81	(13)	10.24	(15)	49.02	(13)	765.8	(16)
	2nd Quarter	7.64	(7)	9.84	(7)	50.56	(6)	653.6	(10)
	3rd Quarter	7.86	(8)	10.06	(7)	50.77	(8)	734.4	(11)
	4th Quarter	7.46	(17)	9.90	(21)	48.20	(16)	1,315.8	(25)
2013	Full Year	7.66	(45)	10.02	(50)	49.25	(43)	3,469.6	(62)
	1st Quarter	7.71	(6)	10.23	(8)	51.08	(8)	251.4	(9)
	2nd Quarter	7.81	(3)	9.83	(5)	49.12	(4)	92.5	(6)
	3rd Quarter	7.55	(11)	9.87	(12)	50.12	(11)	651.5	(16)
	4th Quarter	7.61	(12)	9.78	(13)	50.96	(11)	1,039.1	(19)
2014	Full Year	7.63	(32)	9.91	(38)	50.50	(34)	2,034.5	(50)
2015	1st Quarter	7.79	(9)	10.37	(9)	51.91	(9)	222.5	(11)

#### Gas Utilities--Summary Table

					475	Eq. as %		Amt.	
	<u>Period</u>	ROR % (	# Cases)	ROE % (	# Cases)	Cap. Struc. (	# Cases)	\$ Mil.	(# Cases)
2001	Full Year	8.51	(6)	10.95	(7)	43.96	(5)	114.0	(11)
2002	Full Year	8.80	(20)	11.03	(21)	48.29	(18)	303.6	(26)
2003	Full Year	8.75	(22)	10.99	(25)	49.93	(22)	260.1	(30)
2004	Full Year	8.34	(21)	10.59	(20)	45.90	(20)	303.5	(31)
2005	Full Year	8.25	(29)	10.46	(26)	48.66	(24)	458.4	(34)
2006	Full Year	8.51	(16)	10.43	(16)	47.43	(16)	444.0	(25)
2007	Full Year	8.12	(32)	10.24	(37)	48.37	(30)	813.4	(48)
2008	Full Year	8.48	(30)	10.37	(30)	50.47	(30)	884.8	(41)
2009	Full Year	8.15	(28)	10.19	(29)	48.72	(28)	475.0	(37)
2010	Full Year	7.95	(38)	10.08	(37)	48.56	(38)	816.7	(49)
2011	Full Year	8.09	(18)	9.92	(16)	52.49	(14)	436.3	(31)
2012	Full Year	7.98	(30)	9.94	(35)	51.13	(32)	263.9	(41)
	1st Quarter	7.31	(3)	9.57	(3)	48.80	(3)	39.0	(6)
	2nd Quarter	7.21	(5)	9.47	(6)	51.21	(5)	259.1	(12)
	3rd Quarter	7.53	(1)	9.60	(1)	53.84	(1)	6.1	(3)
	4th Quarter	7.47	(11)	9.83	(11)	50.52	(11)	189.5	(16)
2013	Full Year	7.39	(20)	9.68	(21)	50.60	(20)	493.7	(37)
	1st Quarter	7.67	(6)	9.54	(6)	51.14	(6)	23.5	(9)
	2nd Quarter	7.76	(8)	9.84	(8)	52.12	(8)	62.2	(12)
	3rd Quarter	7.40	(8)	9.45	(6)	49.51	(8)	329.1	(11)
	4th Quarter	7.96	(7)	10.28	(6)	52.35	(7)	115.5	(16)
2014	Full Year	7.69	(29)	9.78	(26)	51.25	(29)	530.3	(48)
2015	1st Quarter	6.41	(2)	9.47	(3)	50.41	(2)	168.7	(9)

RRA-REGULATORY FOCUS -5- April 13, 2015

#### **ELECTRIC UTILITY DECISIONS**

<u>Date</u>	Company (State)	ROR <u>%</u>	ROE <u>%</u>	Common Eq. as % <u>Cap. Str.</u>	Test Year & <u>Rate Base</u>	Amt. <u>\$ Mil.</u>
2014	FULL-YEAR: AVERAGES/TOTAL	7.63	9.91	50.50		2,034.5
	OBSERVATIONS	32	38	34		50
1/23/15	PacifiCorp (WY)	7.41	9.50	51.43	6/15-A	20.2
2/4/15	Monongahela Power/Potomac Ed. (WV)				12/13	124.3 (B,1)
2/18/15	Virginia Electric and Power (VA)	7.88	11.00	52.03	3/16-A	36.9 (LIR,B,2)
2/24/15	Public Service Co. of Colorado (CO)	7.55	9.83	56.00	12/13-YE	-39.4 (I,B)
3/2/15	Black Hills Power (SD)	7.76			9/13-A	6.9 (I,B)
3/12/15	Virginia Electric and Power (VA)	8.40	12.00	52.03	3/16-A	-6.4 (LIR,3)
3/12/15	Virginia Electric and Power (VA)	7.88	11.00	52.03	3/16-A	11.4 (LIR,B,4)
3/12/15	Virginia Electric and Power (VA)	7.88	11.00	52.03	3/16-A	5.8 (LIR,5)
3/18/15	Jersey Central Power & Light (NJ)	8.01	9.75	50.00 (Hy)	12/11-YE	-115.0 (D)
3/25/15	PacifiCorp (WA)	7.30	9.50	49.10	12/13-A	9.6
3/26/15	Northern States Power-Minnesota (MN)		9.72	52.50	12/14	168.2 (I,Z)
2015	1ST QUARTER: AVERAGES/TOTAL OBSERVATIONS	7.79 9	10.37 9	51.91 9	-	222.5 11

#### **GAS UTILITY DECISIONS**

				Common	<b>Test Year</b>	
		ROR	ROE	Eq. as %	&	Amt.
<u>Date</u>	Company (State)	<u>%</u>	<u>%</u>	Cap. Str.	Rate Base	<u>\$ Mil.</u>
2014	FULL-YEAR: AVERAGES/TOTAL	7.69	9.78	51.25		530.3
	OBSERVATIONS	29	26	29		48
			•			
1/13/15	Consumers Energy (MI)		10.30		12/15	45.0 (I,B)
1/14/15	Indiana Gas (IN)				6/14-YE	5.7 (LIR,6)
1/14/15	Southern Indiana Gas & Electric (IN)				6/14-YE	1.5 (LIR,6)
1/21/15	North Shore Gas (IL)	6.26	9.05	50.48	12/15-A	3.5 (R)
1/21/15	Peoples Gas Light & Coke (IL)	6.56	9.05	50.33	12/15-A	71.1 (R)
1/26/15	Piedmont Natural Gas (NC)				10/14	26.6 (LIR,7)
1/27/15	Atmos Energy (KS)				9/14-YE	0.3 (LIR,8)
1/27/15	Northern States Power-Minnesota (MN)				12/15	14.7 (LIR,9)
1/28/15	Northern Indiana Public Service (IN)				6/14-YE	0.3 (LIR,10)
2015	1ST QUARTER: AVERAGES/TOTAL	6.41	9.47	50.41		168.7
	OBSERVATIONS	2	3	2		9

RRA-REGULATORY FOCUS -6- April 13, 2015

#### **FOOTNOTES**

- A- Average
- B- Order followed stipulation or settlement by the parties. Decision particulars not necessarily precedent-setting or specifically adopted by the regulatory body.
- COC- Case involved only the determination of cost-of-capital parameters.
- CWIP- Construction work in progress
  - D- Applies to electric delivery only
  - DCt Date certain rate base valuation
  - F- Estimated
  - F- Return on fair value rate base
  - Hy- Hypothetical capital structure utilized
  - I- Interim rates implemented prior to the issuance of final order, normally under bond and subject to refund.
  - LIR Limited-issue rider proceeding
  - M- "Make-whole" rate change based on return on equity or overall return authorized in previous case.
  - R- Revised
  - Te- Temporary rates implemented prior to the issuance of final order.
  - U- Double leverage capital structure utilized.
  - W- Case withdrawn
  - YE- Year-end
  - Z- Rate change implemented in multiple steps.
  - \* Capital structure includes cost-free items or tax credit balances at the overall rate of return.
  - (1) Consolidated rate proceeding for Monongahela Power and Potomac Edison, whose rate schedules were combined.
  - (2) Increase authorized through a surcharge, Rider W, which reflects in rates the investment in the Warren County Power Station and associated transmission facilities. New rates effective 4/1/15. The indicated overall return and capital structure are placeholders pending a 2015 biennial review.
  - (3) This proceeding determines the revenue requirement for Rider B, which is the mechanism through which the company recovers costs associated with its plan to convert the Altavista, Hopewell, and Southampton Power Stations to burn biomass fuels. The indicated overall return and capital structure are placeholders pending a 2015 biennial review.
  - (4) Represents rate increase associated with the company's Rider R proceeding, which is the mechanism through which the company recovers the investment in the Bear Garden generating facility. The indicated overall return and capital structure are placeholders pending a 2015 biennial review.
  - (5) This proceeding determines the revenue requirement for Rider S, which recognizes in rates the company's investment in the Virginia City Hybrid Energy Center. The indicated overall return and capital structure are placeholders pending a 2015 biennial review.
  - (6) Initial proceeding to establish the rates to be charged to customers under the company's "compliance and system improvement adjustment" (CSIA) mechanism.
  - (7) Case involves the company's Integrity Management Rider (IMR), under which it is authorized to track and recover prudently incurred capital investments and associated costs incurred to comply with federal pipeline safety and integrity requirements outside of a general rate case.
  - (8) Case involves an update to the company's gas system reliability surcharge (GSRS) rider.
  - (9) Case represents the company's first filing under its Gas Utility Infrastructure Cost (GUIC) Rider.
  - (10) This is the initial proceeding to establish the rates to be charged to customers under the company's transmission, distribution, and storage system improvement charge (TDSIC) rate adjustment mechanism.

Dennis Sperduto



# RatingsDirect<sup>®</sup>

#### Summary:

# New York State Power Authority; CP; Wholesale Electric

#### **Primary Credit Analyst:**

David N Bodek, New York (1) 212-438-7969; david.bodek@standardandpoors.com

#### **Secondary Contact:**

Jeffrey M Panger, New York (1) 212-438-2076; jeff.panger@standardandpoors.com

#### **Table Of Contents**

Rationale

Outlook

Related Criteria And Research

#### Summary:

# New York State Power Authority; CP; Wholesale Electric

Credit Profile	TO A PERSON DE LA PROPERTIE DE	
New York St Pwr Auth adj rate		
Long Term Rating	AA/A-1/Stable	Upgraded
New York St Pwr Auth taxable comm ppr		
Short Term Rating	A-1+	Upgraded
New York St Pwr Auth tax-ex comm ppr 2		
Short Term Rating	A-1+	Upgraded
New York St Pwr Auth CP		
Short Term Rating	A-1+	Upgraded

#### Rationale

Standard & Poor's Ratings Services has raised its long-term rating on the New York State Power Authority's (NYPA) \$1.1 billion of senior debt to 'AA' from 'AA-'. At the same time, Standard & Poor's raised its short-term rating on the authority's subordinate lien series 1-3 commercial paper (CP) and its series 1 extendible municipal CP (EMCP) notes to 'A-1+' from 'A-1'. The CP and EMCP balance outstanding as of Dec. 31, 2013 was \$554 million. Standard & Poor's also raised its ratings on NYPA's \$106 million senior-lien 1985 adjustable-rate tender notes to 'AA/A-1' from 'AA-/A-1'. The outlook is stable.

The upgrade reflects our assessment of the following factors:

- A track record of consistently strong 2009-2013 fixed charge coverage of at least 2.3x after adjustments for recurring transfer payments to New York State and capacity and tolling payments to other generation owners;
- A very favorable debt-to-capitalization ratio of 31% in 2013, down from 42% in 2009; and
- The utility's forecast that its plans to use cash balances to fund portions of its capital program, which together with the amortization of portions of existing debt, will yield stable debt balances of about \$1.7 billion through 2017, as it pursues a large \$1.96 billion 2014-2017 capital program.

The authority pays debt service from the net revenues of its electric system.

The 'AA' rating reflects our view of the following strengths:

• NYPA exhibited strong debt service coverage of direct debt of at least 3x since fiscal 2008 (year ended Dec. 31) and at least 5.5x in 2012 and 2013. We treat recurring transfers to the state's economic development programs as operating expenses. We also treat as debt service a portion of tolling payments to other generation owners, rather than treat it as an operating expense, because we view these payments as funding the developer's recovery of investments in generating assets. Although these adjustments dilute coverage, our fixed charge coverage was nevertheless at least 2.3x since 2010 and at least 3.0x in 2012 and 2013.

Summary: New York State Power Authority; CP; Wholesale Electric

- The utility's debt burden is low, with a debt-to-capitalization ratio of 31% at Dec. 31, 2013, down substantially from 42% in 2009 and 55% in 2005. The favorable ratio partially reflects the authority's debt reduction achievements and its reliance on other energy suppliers' generation resources to serve substantial portions of its customers' energy needs.
- NYPA benefits from autonomous rate-setting authority and is not subject to New York State Public Service
  Commission oversight. Nevertheless, we believe the state places meaningful financial demands on the utility that
  could erode financial strength and flexibility.
- Unrestricted cash and investments of \$1.3 billion at year-end 2013 represented more than six months' operating expenses.
- NYPA serves a broad and economically diverse service territory.
- Strong demand for the authority's low cost hydroelectric generation output accounts for more than half of its energy sales, but only about 20% of revenues. Nevertheless, hydroelectric resources are important contributors to NYPA's financial margins.
- The authority benefits from its Southeastern New York customers' election to assume responsibility for variability in power supply costs the utility previously bore.
- Firm transmission rights provide the utility with a financially valuable corridor for moving power generated upstate to New York City.

We believe the utility faces the following exposures:

- As a state authority, NYPA is exposed to substantial political influences, including pressure to contribute to and fund state economic development programs, which we view as having the potential to erode its financial strength. For example, the authority has been charged with making loans to further the state's energy efficiency goals. This nearly \$300 million program and other loan programs expose the utility to the creditworthiness of the programs' borrowers.
- NYPA has a history of substantial, but declining transfers of surpluses to the state. Transfers of \$65 million in 2013 represented 2% of operating revenues, which was significantly lower than 2009's \$119 million and 2010's \$147 million, or 4.6% and 5.7% of those years' operating revenues, respectively.
- The authority lent \$318 million to the state in 2009 to help it address budget deficits. New York pledged to repay this loan in two installments: \$103 million in 2014 and \$215 million in 2017. Loan repayment hinges on legislative appropriations and the loans do not constitute state debt. The state did not repay the 2014 maturity in full. Rather, NYPA expects the state to repay 2014's maturity in five annual installments. It received the first Oct. 1. We view the state's substantial transfers and the loan as placing significant demands on liquidity.
- NYPA projects nearly \$2 billion of 2014-2017 capital spending. However, it projects stable debt balances of close to \$1.7 billion as it funds capital investments. The utility projects stable debt balances based on the amortization of existing debt and the use of balance sheet cash and cash from operations to finance one-half to two-thirds of the projects' costs.
- Sales of hydroelectric facilities' output are important contributors to operating margins and their contributions are susceptible to compromise during periods of drought or low market electricity prices, which could erode financial performance.
- Although customers of the utility's hydroelectric resources pay very low rates, they have historically resisted rate
  adjustments, which could erode financial flexibility. However, the authority is implementing 18% rate increases for
  these customers covering 2011-2014. The increases are raising rates to \$13 per megawatt-hour from \$11.
- About 40% of debt obligations are variable-rate. NYPA mitigates this risk through swaps and caps leaving unhedged about 30% of variable rate debt as a percent of total debt. We believe the ratings on the swap counterparties and the utility provide considerable headroom relative to the termination triggers in the swap documents.

Summary: New York State Power Authority; CP; Wholesale Electric

NYPA is a corporate municipal instrumentality and political subdivision of New York State. It primarily sells wholesale electricity to municipal utilities, governmental entities, large industrial and commercial customers, investor-owned utilities, and utilities in neighboring states. Its contracts tend to be medium-to-long-term.

Unlike many other utilities, the authority does not socialize its power supply costs across all customers. Rather, customers pay charges tied to the resources that supply their electricity needs. The utility's low-cost, hydroelectric portfolio mostly benefits its upstate customers. It also sells some of the hydroelectric output to industrial customers in New York State and municipalities within and outside the state. The industrial sales are made to support state economic development programs and the sales to municipalities to meet Federal Energy Regulatory Commission license obligations of the hydroelectric facilities. The authority principally serves its downstate governmental customers' needs with owned and contracted thermal resources that it supplements with market purchases.

NYPA's upstate hydroelectric facilities continue to supply about 50% of the energy it sells. By comparison, the hydroelectric energy's consumers account for only about 20% of energy sales revenues. At the same time, downstate customers accounted for nearly 40% of energy sales and about 60% of revenues. Margins on the low-cost hydroelectric sales and transmission service are substantially greater than those from sales to downstate governmental bodies. Transmission services are also important to the utility's revenue stream.

At year-end 2013, the authority had nearly \$1.7 billion in debt, which was 26% lower than 2007's peak debt of \$2.3 billion. Management reports that using cash for half to two-thirds of capital spending, together with existing debt's amortization, should lead to stable debt balances.

Debt service coverage of all senior and subordinate capital market obligations has been at least 3x since fiscal 2009 and was 5.5x in 2012 and 2013. Coverage ratios benefit from Entergy Corp.'s annual installment payments for its \$967 million purchase of NYPA's interests in the Indian Point 3 and James A. Fitzpatrick nuclear generating stations in 2000. The authority records Entergy's payments of about \$72 million per year on its income statement as other income. The payments will continue through 2015. The utility plans to use rate increases to offset the loss of the Entergy payments.

Standard & Poor's analysis also focuses on fixed-charge coverage. We view recurring transfer payments to the state and its economic development programs as operating expenses. In addition, we view tolling payments associated with the 500 MW Astoria Energy LLC combined cycle plant that was added in 2011 as funding the developer's recovery of its investment in the plant. Consequently, we calculate coverage ratios that reflect our view that tolling payments have debt service characteristics rather than operating expense attributes. With these adjustments coverage was about 3x in 2012 and 2013. Applying our adjustments to the authority's financial projections indicates it could achieve all-in fixed charge debt service coverage of at least 2.7x through 2017.

NYPA must maintain liquidity facilities sufficient to cover the CP's principal so long as it is outstanding. The note resolution authorizes up to \$1.2 billion of series 1-3 CP, but the revolving credit agreement's \$550 million commitment caps the amount of CP the authority can issue. The revolving credit agreement does not cover NYPA's \$60 million of EMCP.

The banks' liquidity support obligations could terminate before expiration if there default events tied to the utility's

Summary: New York State Power Authority; CP; Wholesale Electric

creditworthiness have occurred. Consequently, the short-term CP rating reflects our view of NYPA's capacity to service short-term obligations, rather than the banks' credit quality. Events that would lead to the liquidity facility's automatic termination include an authority insolvency proceeding and three rating agencies' assignment of speculative-grade ratings to the utility's parity subordinate-lien obligations. The revolving credit agreement expires in January 2015.

#### Outlook

The stable outlook reflects our view of the utility's capacity to perpetuate its consistent record of strong debt service coverage and liquidity. Existing debt's amortization and plans to use cash to fund meaningful portions of the capital program should maintain stable debt balances and improve leverage as the substantial capital program proceeds. The level of transfer payments to state programs, and the state's timely repayment of NYPA's loans to the state will be important to sustaining credit quality. We do not plan to raise or lower the rating during our two-year outlook period.

#### Related Criteria And Research

#### Related Criteria

USPF Criteria: Electric Utility Ratings, June 15, 2007

Ratings Detail (As Of November 3	, 2014)	NAME OF TAXABLE PARTY.
New York St Pwr Auth wholesale elec		
Long Term Rating	AA/Stable	Upgraded
New York St Pwr Auth wholesale elec (N	MBIA) BHAC)	
Unenhanced Rating	AA(SPUR)/Stable	Upgraded
New York St Pwr Auth rev bnds		
Unenhanced Rating	AA(SPUR)/Stable	Upgraded
New York St Pwr Auth taxable rev l	onds ser 2003A dtd 12/18/2003 due 11/15/	2008-2013 2018 2023 2028 2033
Unenhanced Rating	AA(SPUR)/Stable	Upgraded
New York St Pwr Auth wholesale el	ec	
Unenhanced Rating	AA(SPUR)/Stable	Upgraded
Many issues are enhanced by bond insurance	e.	

Complete ratings information is available to subscribers of RatingsDirect at www.globalcreditportal.com. All ratings affected by this rating action can be found on Standard & Poor's public Web site at www.standardandpoors.com. Use the Ratings search box located in the left column.

Copyright © 2014 Standard & Poor's Financial Services LLC, a part of McGraw Hill Financial. All rights reserved.

No content (including ratings, credit-related analyses and data, valuations, model, software or other application or output therefrom) or any part thereof (Content) may be modified, reverse engineered, reproduced or distributed in any form by any means, or stored in a database or retrieval system, without the prior written permission of Standard & Poor's Financial Services LLC or its affiliates (collectively, S&P). The Content shall not be used for any unlawful or unauthorized purposes. S&P and any third-party providers, as well as their directors, officers, shareholders, employees or agents (collectively S&P Parties) do not guarantee the accuracy, completeness, timeliness or availability of the Content. S&P Parties are not responsible for any errors or omissions (negligent or otherwise), regardless of the cause, for the results obtained from the use of the Content, or for the security or maintenance of any data input by the user. The Content is provided on an "as is" basis. S&P PARTIES DISCLAIM ANY AND ALL EXPRESS OR IMPLIED WARRANTIES, INCLUDING, BUT NOT LIMITED TO, ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE, FREEDOM FROM BUGS, SOFTWARE ERRORS OR DEFECTS, THAT THE CONTENT'S FUNCTIONING WILL BE UNINTERRUPTED, OR THAT THE CONTENT WILL OPERATE WITH ANY SOFTWARE OR HARDWARE CONFIGURATION. In no event shall S&P Parties be liable to any party for any direct, incidental, exemplary, compensatory, punitive, special or consequential damages, costs, expenses, legal fees, or losses (including, without limitation, lost income or lost profits and opportunity costs or losses caused by negligence) in connection with any use of the Content even if advised of the possibility of such damages.

Credit-related and other analyses, including ratings, and statements in the Content are statements of opinion as of the date they are expressed and not statements of fact. S&P's opinions, analyses, and rating acknowledgment decisions (described below) are not recommendations to purchase, hold, or sell any securities or to make any investment decisions, and do not address the suitability of any security. S&P assumes no obligation to update the Content following publication in any form or format. The Content should not be relied on and is not a substitute for the skill, judgment and experience of the user, its management, employees, advisors and/or clients when making investment and other business decisions. S&P does not act as a fiduciary or an investment advisor except where registered as such. While S&P has obtained information from sources it believes to be reliable, S&P does not perform an audit and undertakes no duty of due diligence or independent verification of any information it receives.

To the extent that regulatory authorities allow a rating agency to acknowledge in one jurisdiction a rating issued in another jurisdiction for certain regulatory purposes, S&P reserves the right to assign, withdraw, or suspend such acknowledgement at any time and in its sole discretion. S&P Parties disclaim any duty whatsoever arising out of the assignment, withdrawal, or suspension of an acknowledgement as well as any liability for any damage alleged to have been suffered on account thereof.

S&P keeps certain activities of its business units separate from each other in order to preserve the independence and objectivity of their respective activities. As a result, certain business units of S&P may have information that is not available to other S&P business units. S&P has established policies and procedures to maintain the confidentiality of certain nonpublic information received in connection with each analytical process.

S&P may receive compensation for its ratings and certain analyses, normally from issuers or underwriters of securities or from obligors. S&P reserves the right to disseminate its opinions and analyses. S&P's public ratings and analyses are made available on its Web sites, www.standardandpoors.com (free of charge), and www.ratingsdirect.com and www.globalcreditportal.com (subscription) and www.spcapitaliq.com (subscription) and may be distributed through other means, including via S&P publications and third-party redistributors. Additional information about our ratings fees is available at www.standardandpoors.com/usratingsfees.



# Rating Update: Moody's upgrades New York Power Authority to Aa1, outlook stable

Global Credit Research - 12 Nov 2014

#### Approximately \$1.1 billion of revenue bonds affected

NEW YORK STATE POWER AUTHORITY Electric Distribution and Generation NY

#### **Opinion**

NEW YORK, November 12, 2014 --Moody's Investors Service has upgraded the New York State Power Authority's (NYPA or the Authority) approximately \$1.1 billion of revenue bonds outstanding to Aa1 from Aa2, and affirmed its short-term ratings for commercial paper and variable rate bonds at P-1 and VMIG 1 respectively. The outlook for NYPA is stable.

#### SUMMARY RATING RATIONALE

The upgrade reflects disciplined financial practices that will enable NYPA to expand on its strategic objectives of providing low cost, reliable, clean energy in a manner the encourages business development in the State of New York. Its credit metrics are among the strongest of all U.S. public power electric utilities with generation ownership in our rated universe. The Authority is an integral part of State supported plans to reinforce and modernize New York's electric grid and promote economic development and efficiency. As the owner of over 3,200 MWs of upstate hydroelectric facilities, and about a third of the State's high-voltage transmission facilities, NYPA is uniquely positioned to provide very low-cost, clean energy in support of State goals. The Authority's strong balance sheet positions it well to continue to invest in the modernization and expansion of its system while maintaining solid financial metrics and, given the current credit profile of New York State (Aa1, General Obligation) we anticipate future transfers to the state will be relatively modest, and we expect the State will continue the return of funds that were temporarily transferred to it in 2009.

#### Strengths

Competitive advantage provided by well run low-cost hydro units

Instrumentality of the State - key to achieving economic development and policy goals

Strong internal financial liquidity and debt service coverage with limited use of leverage

#### Challenges

Significant, over \$2 billion, capital improvement to be undertaken in conjunction with State policy goals

Exposure to interest rate volatility/counter party credit risk as a result of expanding energy efficiency programs

Has been called upon to provide financial support to the State

#### Outlook

The stable outlook considers NYPA's strong management of its financial operations, limited leverage and favorable cost position. The stable outlook assumes NYPA's capital program will be financed in a balanced manner and that it will be able to recover the costs of these programs in a timely fashion. The outlook assumes that growing energy efficiency programs are managed in a way to limit counterparty credit exposure. The stable outlook assumes NYPA will be successful in replacing its revolving credit facilities with favorable terms prior to their current January 2015 termination date.

What Could Change the Long Term Rating - Down

The rating could face downward pressure there were to be additional unexpected transfers to the State of New York, if the Authority was to fund its capital program in a manner that was inconsistent with maintaining or improving financial metrics, if it were to be unable or unwilling to recover the cost of these programs, if annual debt service coverage were to remain below 2.0 x, or if there were to be significant losses relating to NYPA's energy efficiency programs.

What Could Change the Long Term Rating - Up

The rating is well positioned at its current Aa1 level.

**Issuer Description** 

The New York State Power Authority was created in 1931 and formed the basis for later federal power initiatives such as the Tennessee Valley Authority and the Bonneville Power Authority. NYPA is primarily a provider of wholesale power, but it also has a large direct industrial and commercial customer base, which is growing as a result of State mandated programs such as Recharge NY that are designed to support business development through the provision of low-cost electricity. NYPA's customers include 51 New York municipal and rural cooperatives electric systems, seven out-of-state public systems, three investor-owned utilities, two public transportation agencies, over 100 public agencies in southeast New York, and over 600 individual business or non-for profit customers. About 60% of 2013 revenues were derived from southeast New York governmental customers (representing about 25% of volume); 20% from upstate New York hydro customers (includes municipal and industrial); and 6% from transmission customers. Hydro generation accounts for about half of NYPA's delivered energy, and about 70% of its own production.

NYPA is governed by a seven-member Board of Trustees who are nominated by the Governor and confirmed by the State Senate. The board has broad rate setting authority for its power sales agreements as well as its tariff customers. Transmission rates are regulated by the Federal Energy Regulatory Commission. NYPA management has prudent debt and risk management policies and maintains strong internal financial liquidity.

#### **DETAILED CREDIT DISCUSSION**

Competitive advantage provided by low-cost hydro generation assets

As the owner of approximately 3,200 MW of Great Lakes basin hydro-electric generation facilities, NYPA is uniquely positioned to provide its customers with some of the nation's lowest cost, most dependable, electric power. At average water flow, NYPA hydroelectric generation represents about 70% of NYPA's net generation. The plants have historically demonstrated very high levels of availability, with factors that average around 90%.

The hydro units are powered by the massive quantities of water that flow from the Great Lakes basin to the Atlantic Ocean. Precipitation over the Great Lakes can have an impact on net generation levels; however forecasting is relatively predictable as it takes several years for the water to flow down from the upper lakes. The St. Lawrence plant spans the St. Lawrence River between New York and Canada below Lake Ontario capturing water flowing from all five lakes. Its capacity factors, as reported by SNL Financial, have typically been above 90%. The Niagara plant is powered by the diversion of water from the Niagara River between Lake Erie and Ontario upstream from Niagara Falls. During daylight hours during tourist season, the amount of water diverted to the power dam is managed to assure a minimum flow over the falls. As a result, in recent years the reported capacity factor of the Niagara hydroelectric plant has ranged closer to 70%.

The average annual generation from the plants over the past 5 years was 20.6 TWh versus a long term average of 20.2 TWh. While generation in 2013 was 19.6 TWh, water levels in Lakes Superior and Michigan are reported to currently be at their highest levels since the late 1990s; as a result power production for the next few years is expected to be somewhat higher. For 2014, the current production forecast is 20.9 TWh versus an original budget of 19.95 TWh. For 2015, NYPA's multi-year plan assumes hydro electric output of over 21.8; NYPA now believes the estimate for 2015 will also be adjusted upward.

NYPA continues to demonstrate its capability in operating these significant assets. Life extension and modernization programs, including the replacement of all turbines, have been completed at both the 2,400 MW Niagara and the 800 MW St. Lawrence -FDR hydroelectric plants, and the Federal Energy Regulatory Commission (FERC) has relicensed each of the facilities for another 50 years - through 2050. NYPA is now in the process of a life extension and modernization project at the 240 MW Lewiston pump-storage facility that is located at Niagara.

The average production cost of NYPA's hydroelectric generation is in the \$10/MWh range which compares very

favorably to the regional marginal cost of power. As discussed below, the benefit of this low cost power is passed on, in some form or fashion, to the majority of NYPA's customers based on Federal and/or State law.

NYPA serves as an instrumentality of the State and plays a key part in its economic development goals

NYPA derives its authority from New York's Power Authority Act, which also makes NYPA responsible for providing transmission and generation services to New York customers. One of NYPA's major missions is providing low-cost energy and capacity to large high load factor industries and employers in upstate New York. NYPA also provides an essential service to its downstate governmental and non-profit customers, providing them a relatively low cost power option, and they have historically been called upon for special projects to assure grid reliability and resource capacity in the New York City area. NYPA has been able to fulfill its important role while maintaining financial discipline and a very strong balance sheet. The Aa1 rating assumes this historic financial discipline will continue and also assumes NYPA will ultimately be able to recover the costs associated with responding to additional State objectives.

Since its inception, NYPA has an important role in economic development in upstate with the supply of low cost electricity. Over the years hydro output from the Niagara and St. Lawrence plants has been allocated to various types of customers, some, for example municipal and co-operative systems, pay cost based rates, whereas others, such as industrial customers, may pay somewhat higher rates, but always below prevailing market levels. Special funds, created by the sale of electricity generated from excess hydro capacity, have also been established to continue development in the upstate region. NYPA also provides power to over 100 municipalities, school districts and public agencies located in New York City and Westchester County.

More recently, the Recharge New York Power Program is an initiative that commenced in 2012 with the goal of spurring further economic development. The program allocates 455 MW of hydropower from the Niagara and St. Lawrence-FDR projects combined with 455 MW of market-based power purchases to businesses and not-for-profit corporations in return for job commitments and capital investments. At the end of 2013, a total of 735 MW has been allocated to over 500 businesses and not-for-profits throughout the state. In exchange, these employers have agreed to create more that 384,000 positions and invest over \$31 billion in capital improvements to their facilities. The power from the hydro units was withdrawn from upstate investor owned utility residential customers; these customers are now receiving a subsidy that is being phased out over a period of years.

Downstate, NYPA's is responsible for providing reliable cost effective service to an assortment of primarily governmental customers including the Metropolitan Transit Authority (MTA); the City of New York; the Port Authority of New York and New Jersey; the New York City Housing Authority; New York State Office of General Services; and Westchester County. NYPA is generally insulated from the operational and financial risks of serving its downstate customers. The New York City Governmental customers are served under contracts with rates that adjust annually to reflect increases in fixed costs and monthly to pass-through changes in variable costs including fuel and purchased power and NYISO-related costs. The current contracts expire December 31, 2017 and the customers also have a right to terminate the service with notice. However, in the event of a termination, the customers would have to compensate NYPA for any above market costs associated with purchased power resources used to supply them, including any energy/capacity hedges. They would also be required to assume the contract for the purchase of capacity from the 550 MW gas-fired Astoria Energy II project that was put in place to serve them. This provision protects NYPA from any unrecoverable costs.

NYPA provides power to its downstate customers via market purchases and with power generated by its own 500 MW gas-fired plant in Astoria Queens, as well as 550 MW contracted from Astoria Energy II. NYPA's access to transmission (it owns approximately 1,400 circuit miles, more than any state utility) provides the Authority an advantage when purchasing power in the market which along with the efficiency of its controlled assets, results in a cost savings to its downstate customers. NYPA works closely with its customers to agree on hedging strategies and they estimate their customer's costs are about 20% below its competitors' rates.

NYPA has also been called upon to implement State and City reliability objectives. In the past, NYPA was called upon to shore up reliability by quickly building in-city generation in transmission constrained New York City. In 2005, NYPA installed 11 peaking units with a total of 440 MW of net dependable capacity. NYPA accelerated the retirement of the debt issued to finance those units using the energy margins earned to pay off the debt. Currently, they are utilized only for grid reliability; power produced by them units is sold entirely on a merchant basis.

More recently, in an effort to assure reliability and provide the ability to access historically lower priced power from PJM, in 2011 NYPA contracted with Hudson Transmission Partners for 75% of the capacity of a 660 MW transmission line extending from Bergen County New Jersey to Con Edison's West 49th street substation in midtown Manhattan. The line became partially operational in 2013 and is currently operating on a merchant basis.

Based on current market prices, NYPA's forecast assumes there will be approximately \$50-\$70 million of under-recovery during each of the first few years of the line's operation. Under the terms of the contract, these amounts are tracked and may be used to reduce the price of NYPA's purchase option at the end of the 20 year contract. NYPA's credit profile is strong enough to manage through this period of under-recovery; however, to the extent NYPA were to commit to additional large projects without a clear path to timely recovery through rates or contracts, there could be downward pressure on its Aa1 rating.

#### Significant capital improvement program

NYPA estimates expenditures for its internal capital improvement program over the 2015-2018 period will be approximately \$1.4 billion. Average annual expenditures of about \$300 million per year are about twice that of prior periods. The majority of the expenditures over the period will be made in conjunction with transmission upgrades including an approximately \$726 million, 12 year, transmission life extension and modernization (TLEM) project that will is part of a State initiative to improve grid reliability. Life extension and management activities are also planned at the Niagara Lewiston pumped storage plant. NYPA anticipates these projects will be funded in a manner consistent with its targeted capitalization of about 1/3 debt to capital, and indicates they have accumulated over \$800 million in a capital reserve for these projects. As a result, debt outstanding is expected to remain fairly constant. NYPA has a history of successful project completion, and we anticipate the costs of these projects will ultimately be recovered through timely adjustments to customer rates.

#### Expansion of energy efficiency programs

In addition to its internal capital program, NYPA's 2015-2018 capital budget includes about \$800 million for energy efficiency improvements attributed to the BuildSmart NY initiative. This particular program has been spurred by a 2012 Executive Order from the Governor directing state agencies to collectively reduce consumption at state owned buildings by 20 percent within seven years. As part of this initiative, NYPA has offered to provide \$450 million in low-cost financing for state owned buildings, and another \$350 million for towns and municipalities and certain other non-for profits, to complete energy efficiency projects. NYPA has had a similar program in place for governmental customers and state owned buildings since the 1980s, with program expenditures in the range of \$200 million per year. Going forward, the program has been expanded to a wider range of customers, and the annual expenditures are expected to increase by about \$25-\$50 million per year program wide.

The cost of the programs, including financing, are ultimately paid by the program participants, the largest of which the City of New York. The recovery time on the investments is tied to the savings of the program participants; this could be as long as, on average, seven to ten years, but historically about half of the funds lent by NYPA have been returned upon project completion, or in about six to eighteen months. Given the short term nature of the investments, NYPA has historically funded the program entirely through the issuance of commercial paper. As a result NYPA's balance sheet includes a relatively large component of variable rate debt (approximately 20%); however, as the cost of the financing is passed directly to the program participants, NYPA's is shielded from interest rate risk, but exposed to the credit risk. To date, there have been no losses on the program. Historically the incentive was focused only on state customers, going forward it will also include municipalities and certain non-profits such as hospitals and universities, however, the City of New York is still expected to remain the most significant participant. NYPA management is focused on ways to best manage this potential additional credit exposure and to consider alternate forms of financing rather than its commercial paper program.

#### NYPA has been called upon to provide financial support to the State

NYPA is fiscally independent from the State and it receives no tax revenue. The Authority's rates are set by its board of trustees without the need for state regulatory board approval and NYPA has a history of adjusting its rates as necessary to recover the cost of operating and investing in its system while maintaining a strong financial position. The Authority is however authorized to make annual voluntary contributions to the State, which is typically done in conjunction with the State budget. In 2011, the NYPA board adopted a Policy Statement that it will use a 2.00 times debt service coverage ratio as a reference point in considering any transfer of funds.

Although transfers to the State are voluntary and may only be made if not needed for operating expenses or debt service, as the funds are typically expected as part of the state budget, we calculate our fixed obligation coverage after payment of these contributions. Annual voluntary contributions have ranged between \$65 and \$90 million, with contributions of \$90 million being authorized for 2014 and 2015. This level of contribution equates to under 3% of revenues and is considered manageable. The requirement for a 2.0 times debt service coverage ratio also provides some protection for the Authority and its bondholders. Moody's recognizes that the practice of funds transfers from public power enterprises to their host governments is not unusual. The quantum, predictability and discipline around such periodic transfers are key considerations. Based on historic experience, enterprise

visibility, and the strength of management we assume that NYPA will be able to manage funds transfers appropriately.

In 2009, as a result of fiscal stress at the State level, additional temporary transfers totaling \$318 million were made out of funds on hand in NYPA's spent fuel and capital project reserves. These funds have now begun to be returned. The \$103 million of capital project funds was to be repaid as needed by NYPA or by 2014; however, in April 2014 NYPA agreed to accept repayment in annual installments made during 2014-2018. The \$215 million of spent fuel reserves are scheduled to be returned by 2017, we expect this repayment may also be stretched out over several years.

Since 2009, the financial position of State of New York has improved, and in June 2014 its General Obligation bonds were upgraded to Aa1. As a result, we do not anticipate the State will be requesting additional temporary transfers in the foreseeable future. To the extent the State was to once again feel the need to tap NYPA's cash reserves, it could put downward pressure on the rating of NYPA.

Prudent management results in strong financial position

The financial flexibility provided by NYPA's strong balance sheet and debt service coverage ratios are a key factor in its Aa1 rating. Historically, NYPA pursued an aggressive debt-management strategy targeted at eliminating generation-related debt with the intent of lowering its fixed costs and thus its customers' power rates. As a result, it reduced outstanding revenue bond debt (including commercial paper notes) to about \$1.7 billion in 2013 from \$3.5 billion in 1994. The strategy has positioned NYPA well to implement its current large capital program, and as a result, total funded debt is expected to remain fairly constant about \$1.7 billion. This is consistent with NYPA's goal of maintaining a ratio of 35% debt-to-capital (excluding capital leases). As of December 31, 2013, total debt (including capital lease obligations of about \$1.2 billion) is about \$2.9 billion and results in a Moody's calculated debt ratio (total debt / (fixed assets plus working capital) of about 50%, which is one of the lowest of any major U.S. public power electric utility with generation in our rated universe.

NYPA has also been proactive in implementing rate increases to recover the cost of increased investments in its hydro electric assets and its transmission system. In 2011, the board approved four year rate increases for its hydro customers that were phased in through 2014, and in 2013 NYPA received FERC approval for its first ever transmission rate increase. As a result, NYPA's fixed obligation coverage ratios, as calculated by Moody's on the basis of net revenues derived from the income statement after State contributions and including capital lease payments, has averaged above 2.4 times, which scores near the upper end of the Aa range for that metric in our rating methodology for U.S. Public Power Electric Utilities with Generation Ownership Exposure (the Rating Methodology). Going forward, based on NYPA's forecast of increased hydro generation, we anticipate coverage ratios will move above 2.5 times, which is the lower boundary of the Aaa range for that metric in the Rating Methodology. In sensitivity testing of lower than average hydro flows, coverage still remains strong at around 2.3 times. NYPA's exposure to hydrology risk is limited by the interruptible nature of its supply contracts.

#### Liquidity

NYPA's liquidity position is very strong. As of year-end 2013 the Authority had approximately \$1.3 billion (195 days) of unrestricted cash on hand and over \$200 million available under its commercial paper programs, bringing total available liquidity to over 200 days of operating expenses.

NYPA's external liquidity includes various commercial paper programs that have a total face amount of \$1.4 billion and are supported by \$550 million of revolving credit facilities. By board resolution, issuance under the program may not exceed the amount of available revolving credit. As of December 31, 2013, there was approximately \$460 million of commercial paper outstanding under these programs. The existing revolving credit facilities are scheduled to terminate in January 2015, and NYPA has issued a request for proposals to replace them. We anticipate the NYPA will be successful in replacing the credit facilities prior to their termination date at favorable terms.

As discussed above, NYPA's commercial paper program is primarily used as a means to fund energy efficiency programs for qualified participants. As of December 31, 2013, approximately \$450 million of the commercial paper outstanding was associated with these programs.

NYPA also has a \$200 million extendible commercial paper program, which does not have revolver backing. Under this program, any commercial paper not repaid on its specified repayment date automatically becomes due 270 days later. This program was primarily put in place to take out debt incurred in conjunction with NYPA's construction of its 500 MW gas plant. NYPA has been reducing amounts outstanding under the program according

to a schedule that is similar to the original debt amortization schedule. As of December 31, 2013, there was \$62 million of commercial paper outstanding under this program.

Going forward, NYPA anticipates funding a significant portion of its internal capital expenditure program from internal sources, with only a modest (approximately 25%) portion of debt financing.

#### **Bond Security**

NYPA's revenue bonds are payable and secured by a pledge of the Trust Estate including all revenues derived from the operation of any of NYPA's facilities. The rate covenant is sum sufficient. Moody's considers the security provisions weak because there is no debt service reserve account other than \$20 million designated for the 1985 adjustable rate tender notes (currently \$96 million outstanding). This risk is mitigated to some extent by the Authority's very strong internal liquidity, which includes approximately 200 days of cash on hand. The Power Authority Act constitutes a pledge of the state to debt obligation holders not to limit or alter the rights vested in the NYPA until such obligations are met.

Moody's evaluates NYPA's financial performance relative to the U.S. Public Power Electric Utilities with Generation Ownership Exposure methodology, and as depicted below, the grid indicated rating for NYPA is Aa2, one notch below NYPA's current Aa1 rating. We note that the credit metrics scored in Factor 5 - Financial Strength are generally all at the upper end of their respective scoring ranges. We also note the scope of NYPA's operations and integral role in delivering the State's long term policy objectives.

#### METHODOLOGY SCORECARD FACTORS

- Factor 1 Cost Recovery Framework within Service Territory (25% weight): Aaa
- Factor 2 Willingness to Recover Costs with Sound Financial Metrics (25% weight): Aa
- Factor 3 Management of Generation Risk (10% weight): Aa
- Factor 4 Competitiveness (10% weight): Aaa
- Factor 5 Financial Strength Adjusted Days liquidity on Hand (3 year average 245; 2013 229): Aa
- Factor 5 Financial Strength Debt Ratio (3 year average 53%; 2013 50%): A
- Factor 5 Financial Strength Adjusted Debt Service Coverage (3 year average 2.49; 2013 2.40): Aa

Notching Factors - Financial (DSRF below maximum annual debt service): -0.5

Scorecard Indicated Rating: Aa2

#### **KEY CONTACT**

Brian McElroy, Treasurer (914) 287-3956

#### **RATING METHODOLOGIES**

The principal methodology used in this rating was U.S. Public Power Electric Utilities with Generation Ownership Exposure published in November 2011. The additional methodology used in rating the commercial paper notes and variable rate bonds was the Rating Methodology for Municipal Bonds and Commercial Paper Supported by a Borrower's Self-Liquidity published in January 2012. Please see the Credit Policy page on www.moodys.com for a copy of these methodologies.

#### REGULATORY DISCLOSURES

For ratings issued on a program, series or category/class of debt, this announcement provides certain regulatory disclosures in relation to each rating of a subsequently issued bond or note of the same series or category/class of debt or pursuant to a program for which the ratings are derived exclusively from existing ratings in accordance with Moody's rating practices. For ratings issued on a support provider, this announcement provides certain regulatory disclosures in relation to the rating action on the support provider and in relation to each particular rating action for securities that derive their credit ratings from the support provider's credit rating. For provisional ratings, this announcement provides certain regulatory disclosures in relation to the provisional rating assigned, and in relation to a definitive rating that may be assigned subsequent to the final issuance of the debt, in each case where

the transaction structure and terms have not changed prior to the assignment of the definitive rating in a manner that would have affected the rating. For further information please see the ratings tab on the issuer/entity page for the respective issuer on www.moodys.com.

Regulatory disclosures contained in this press release apply to the credit rating and, if applicable, the related rating outlook or rating review.

Please see www.moodys.com for any updates on changes to the lead rating analyst and to the Moody's legal entity that has issued the rating.

Please see the ratings tab on the issuer/entity page on www.moodys.com for additional regulatory disclosures for each credit rating.

#### **Analysts**

Laura Schumacher Lead Analyst Public Finance Group Moody's Investors Service

Chee Mee Hu MANAGING\_DIRECTOR Public Finance Group Moody's Investors Service

#### **Contacts**

Journalists: (212) 553-0376 Research Clients: (212) 553-1653

Moody's Investors Service, Inc. 250 Greenwich Street New York, NY 10007 USA



© 2014 Moody's Corporation, Moody's Investors Service, Inc., Moody's Analytics, Inc. and/or their licensors and affiliates (collectively, "MOODY'S"). All rights reserved.

CREDIT RATINGS ISSUED BY MOODY'S INVESTORS SERVICE, INC. ("MIS") AND ITS AFFILIATES ARE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES, AND CREDIT RATINGS AND RESEARCH PUBLICATIONS PUBLISHED BY MOODY'S ("MOODY'S PUBLICATION") MAY INCLUDE MOODY'S CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. MOODY'S DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL, FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS AND MOODY'S OPINIONS INCLUDED IN MOODY'S PUBLICATIONS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. MOODY'S PUBLICATIONS MAY ALSO INCLUDE QUANTITATIVE MODEL-BASED ESTIMATES OF CREDIT RISK AND RELATED OPINIONS OR COMMENTARY PUBLISHED BY MOODY'S ANALYTICS, INC. CREDIT RATINGS AND MOODY'S

PUBLICATIONS DO NOT CONSTITUTE OR PROVIDE INVESTMENT OR FINANCIAL ADVICE, AND CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT AND DO NOT PROVIDE RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. NEITHER CREDIT RATINGS NOR MOODY'S PUBLICATIONS COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MOODY'S ISSUES ITS CREDIT RATINGS AND PUBLISHES MOODY'S PUBLICATIONS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL, WITH DUE CARE, MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

MOODY'S CREDIT RATINGS AND MOODY'S PUBLICATIONS ARE NOT INTENDED FOR USE BY RETAIL INVESTORS AND IT WOULD BE RECKLESS FOR RETAIL INVESTORS TO CONSIDER MOODY'S CREDIT RATINGS OR MOODY'S PUBLICATIONS IN MAKING ANY INVESTMENT DECISION. IF IN DOUBT YOU SHOULD CONTACT YOUR FINANCIAL OR OTHER PROFESSIONAL ADVISER.

ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY LAW, INCLUDING BUT NOT LIMITED TO, COPYRIGHT LAW, AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT.

All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, all information contained herein is provided "AS IS" without warranty of any kind. MOODY'S adopts all necessary measures so that the information it uses in assigning a credit rating is of sufficient quality and from sources MOODY'S considers to be reliable including, when appropriate, independent third-party sources. However, MOODY'S is not an auditor and cannot in every instance independently verify or validate information received in the rating process or in preparing the Moody's Publications.

To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability to any person or entity for any indirect, special, consequential, or incidental losses or damages whatsoever arising from or in connection with the information contained herein or the use of or inability to use any such information, even if MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers is advised in advance of the possibility of such losses or damages, including but not limited to: (a) any loss of present or prospective profits or (b) any loss or damage arising where the relevant financial instrument is not the subject of a particular credit rating assigned by MOODY'S.

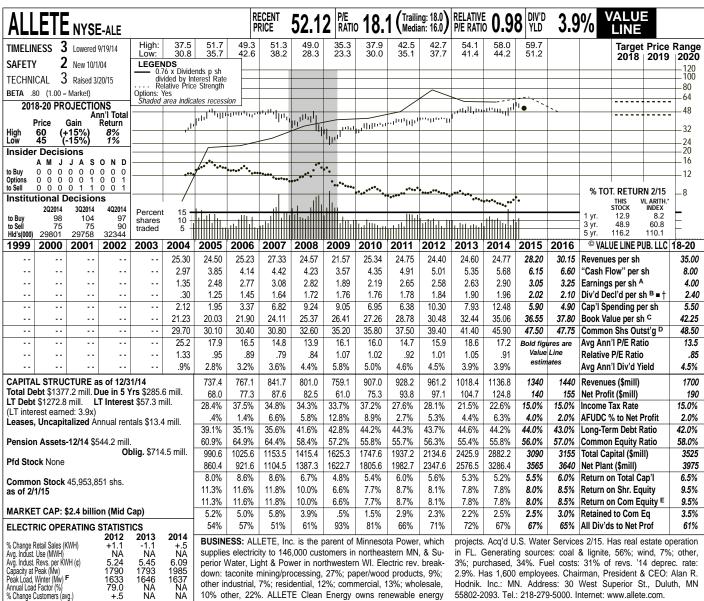
To the extent permitted by law, MOODY'S and its directors, officers, employees, agents, representatives, licensors and suppliers disclaim liability for any direct or compensatory losses or damages caused to any person or entity, including but not limited to by any negligence (but excluding fraud, willful misconduct or any other type of liability that, for the avoidance of doubt, by law cannot be excluded) on the part of, or any contingency within or beyond the control of, MOODY'S or any of its directors, officers, employees, agents, representatives, licensors or suppliers, arising from or in connection with the information contained herein or the use of or inability to use any such

information.

NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER.

MIS, a wholly-owned credit rating agency subsidiary of Moody's Corporation ("MCO"), hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MIS have, prior to assignment of any rating, agreed to pay to MIS for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,500,000. MCO and MIS also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually at <a href="https://www.moodys.com">www.moodys.com</a> under the heading "Shareholder Relations — Corporate Governance — Director and Shareholder Affiliation Policy."

For Australia only: Any publication into Australia of this document is pursuant to the Australian Financial Services License of MOODY'S affiliate, Moody's Investors Service Pty Limited ABN 61 003 399 657AFSL 336969 and/or Moody's Analytics Australia Pty Ltd ABN 94 105 136 972 AFSL 383569 (as applicable). This document is intended to be provided only to "wholesale clients" within the meaning of section 761G of the Corporations Act 2001. By continuing to access this document from within Australia, you represent to MOODY'S that you are, or are accessing the document as a representative of, a "wholesale client" and that neither you nor the entity you represent will directly or indirectly disseminate this document or its contents to "retail clients" within the meaning of section 761G of the Corporations Act 2001. MOODY'S credit rating is an opinion as to the creditworthiness of a debt obligation of the issuer, not on the equity securities of the issuer or any form of security that is available to retail clients. It would be dangerous for "retail clients" to make any investment decision based on MOODY'S credit rating. If in doubt you should contact your financial or other professional adviser.



10% other, 22%. ALLETE Clean Energy owns renewable energy

55802-2093. Tel.: 218-279-5000. Internet: www.allete.com

341 306 345 Fixed Charge Cov. (%) ANNUAL RATES Est'd '12-'14 of change (per sh) 10 Yrs. 5 Yrs. to '18-'20 Revenues 6.0% 5.5% 1.0% 2.0% 5.0% Cash Flow" 7.0% 7.0% 6.0% Earnings 7.0% NMF Dividends Book Value 4.0% 4.5%

Cal- endar			VENUES (		Full Year
2012	240.0	216.4	248.8	256.0	961.2
2013	263.8	235.6	251.0	268.0	1018.4
2014	296.5	260.7	288.9	290.7	1136.8
2015	320	325	345	350	1340
2016	360	345	365	370	1440
Cal-			ER SHAR		Full
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year
2012	.66	.39	.78	.75	2.58
2013	.83	.35	.63	.82	2.63
2014	.80	.40	.97	.73	2.90
2015	.85	.45	.85	.90	3.05
2016	.95	.45	.90	.95	3.25
Cal-	QUART	ERLY DIVI	DENDS PA	IDB∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.445	.445	.445	.445	1.78
2012	.46	.46	.46	.46	1.84
2013	.475	.475	.475	.475	1.90
2014	.49	.49	.49	.49	1.96
2015	.505				

ALLETE's earnings are likely to advance in 2015. Minnesota Power, the company's primary utility subsidiary, will benefit from a full year of income from a 205-megawatt wind project that was completed in December at a cost of \$333 million. The utility gets current cost recovery for certain kinds of capital spending, such as a \$250 million environmental upgrade to a coal-fired generating unit. In addition, Minnesota Power is experiencing load growth as some of its large industrial customers expand their operations. Most notably, Essar Steel expects to begin producing taconite pellets in the second half of 2015. Finally, the company's real estate assets in Florida (which ALLETE intends to sell) should break even this year. It lost \$2 million in 2014. Our estimate is within management's guidance of \$3.00-\$3.20 a share.

There is some upside potential to **profits this year.** Minnesota Power plans to build a wind project for a utility in North Dakota, which would then (if the state regulators approve) buy the project. Prospective income from the sale is not included in ALLETE's guidance. If the regu-

lators do not approve the deal, then Minnesota Power will sell the output under a long-term purchased-power contract.

**ALLETE has made an acquisition.** The company paid \$168 million for an 87% interest in U.S. Water Services, which provides water management for industrial customers. Revenues were about \$120 million last year, and the company expects top-line growth of 10%-15% annually. However, due to amortization that AL-LETE will record under purchase accounting rules, the deal isn't likely to contribute to profits this year.

We forecast solid earnings growth in **2016.** Current recovery of some capital spending and the ongoing effects of industrial expansion should help. We figure U.S. Water Services will also make a constitution tribution.

The board of directors raised the divi**dend this quarter.** The board increased the annual disbursement by \$0.06 a share (3.1%)

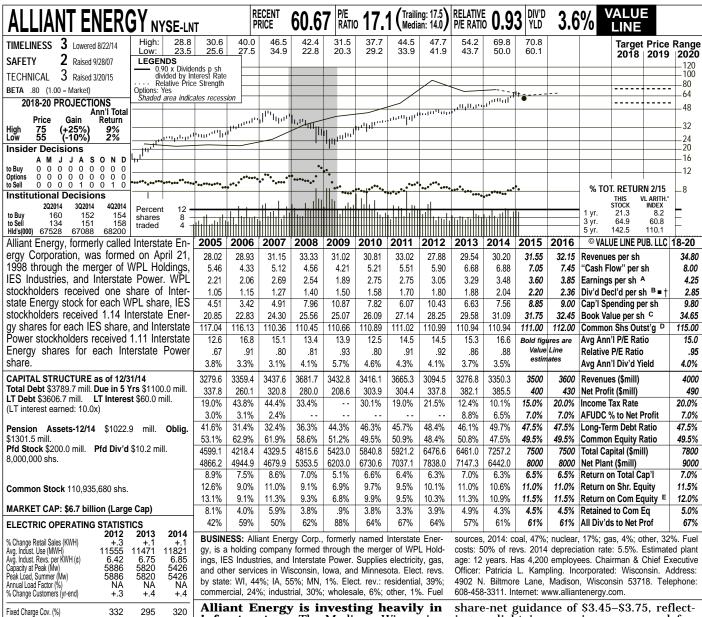
The dividend yield and 3- to 5-year total return potential for ALLETE are about average, by utility standards. Paul E. Debbas, CFA March 20, 2015

(A) Diluted EPS. Excl. nonrec. gain (loss): '04, 2¢; '05, (\$1.84); gain (losses) on disc. ops.: '04, \$2.57, '05, (16¢); '06, (2¢); loss from accounting change: '04, 27¢. Next egs. report

due early May. (B) Div'ds historically paid in early Mar., June, Sept. and Dec. ■ Div'd reinvestment plan avail. † Shareholder investment plan avail. (C) Incl. deferred chgs. In '14:

\$7.78/sh. (**D**) In mill. (**E**) Rate base: Orig. cost deprec. Rate allowed on com. eq. in '10: 10.38%; earned on avg. com. eq., '14: 8.6%. Reg. Clim.: Avg. (F) Summer peak in '12 & '13.

Company's Financial Strength Stock's Price Stability 95 Price Growth Persistence 35 **Earnings Predictability** 80



Alliant Energy is investing heavily in infrastructure. The Madison, Wisconsinbased utility deployed roughly \$1 billion in capital expenditures last year. According to management, it was one of the most active construction years in company history, with over \$335 million poured into energy delivery systems alone. The goal of that considerable investment was to keep pace with customer growth, and bring natural gas services to communities which did not have access before.

Carbon emission reductions remain a top priority. During 2014, Alliant made significant progress transitioning its coalfired facilities to produce higher levels of natural gas fueled generation (which is safer for the environment). The company also increased its use of renewable energy in many of its plants. Additionally, Alliant is constructing several new installations known as wetland systems that will improve the treatment of wastewater around its facilities.

We estimate earnings growth will be in the low-to mid-single-digit range over the next two years. Our 2015 forecast is at the midpoint of management's

ing a slight increase in revenue and fur-CapEx plans. Moreover, Alliant ther should benefit from the certainty several rate settlements that it achieved during the past year for its retail division. For 2016, we think the company will try for further rate increases. We're basing our forecast on reasonable regulatory

treatment from state officials.

The board of directors has raised the dividend. The quarterly distribution was increased \$0.04 a share (8%), and the annualized payout is now \$2.20. For the utility sector, the equity's current yield of around 3.6% is about average for the industry. The company is targeting a payout ratio of 60%-70%.

These shares may appeal to some income-oriented investors. The dividend is well supported by Alliant's predictable cash flows, and the yield is decent, though unspectacular. However, at its most recent quotation, the issue offers below average long-term capital appreciation potential. As such, subscribers seeking upside may want to look elsewhere.

March 20, 2015 Daniel Henigson

(A) Diluted EPS. Excl. nonrecur. gains (losses): '03, net 24¢; '04, (58¢); '05, (\$1.05); '06, 83¢; '07, \$1.09; '08, 7¢; '09, (88¢); '10, (15¢); '11, (1¢); '12, (16¢). Next egs. rpt. due early May. (C) Incl. deferred chgs. In '14: \$90.0 mill., Avg.

ANNUAL RATES

of change (per sh)

Revenues "Cash Flow"

Earnings Dividends

Cal-

endar

2012

2013

2014

2015

2016

Cal-

endar

2012

2013

2014

2015

2016

Cal-

endar

2011

2012

2013

2015

**Book Value** 

765.7

859.6

952.8

950

975

.50

.72

.97

.85

.90

Mar.31

.45

.47

.51

.55

Est'd '12-'14

to '18-'20

4.0%

6.0%

6.0% 4.5%

4.0%

Full

Year

3094.5

3276.8

3350.

3500

3600

Full

Year

3.05

3.29

3.48

3.60

3.85

Full

1.88

Past

5 Yrs.

-1.5% 7.0% 6.5% 6.5%

3.5%

750.9

832.6

804.1

800

800

Dec.31

.63

.55

.55

.60

.65

Dec.31

.425

.45

.47

10 Yrs.

0.5%

4.0% 8.0% 3.5%

3.5%

690.3

718.0

750.3

800

850

Mar.31 Jun.30 Sep.30

.58

.59

.56

.60

.65

.425

.45

.47

.51

QUARTERLY DIVIDENDS PAID B =†

Jun.30 Sep.30

QUARTERLY REVENUES (\$ mill.)

Mar.31 Jun.30 Sep.30 Dec.31

EARNINGS PER SHARE A

887.6

866.6

843.1

950

975

1.34

1.43

1.40

1.55

1.65

.425

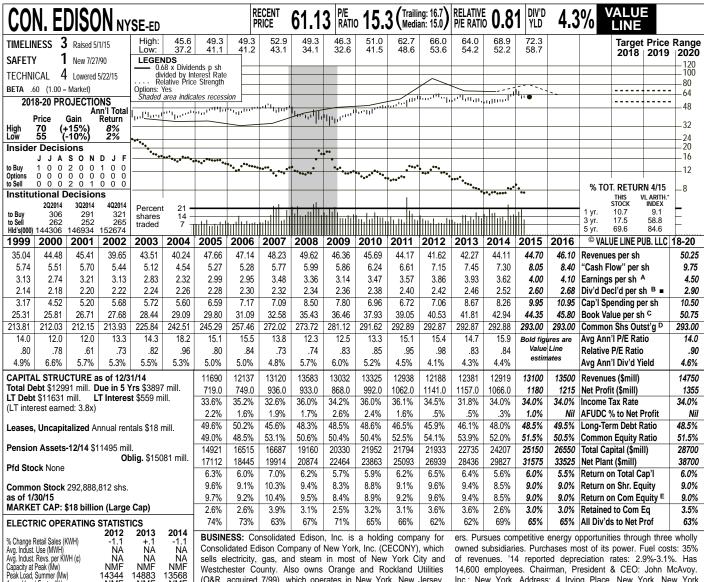
.45

.47

.51

(B) Div'ds historically paid in mid-Feb., May, Aug., and Nov. ■ Div'd reinvest. plan avail. † Shareholder invest. plan avail. † WI in '14 Regul. Clim.: WI, Above Avg.; IA,

Company's Financial Strength Stock's Price Stability Price Growth Persistence 100 95 Earnings Predictability



sells electricity, gas, and steam in most of New York City and Westchester County. Also owns Orange and Rockland Utilities (O&R, acquired 7/99), which operates in New York, New Jersey, and Pennsylvania. Has 3.6 million electric, 1.2 million gas custom-

of revenues. '14 reported depreciation rates: 2.9%-3.1%. Has 14,600 employees. Chairman, President & CEO: John McAvoy. Inc.: New York. Address: 4 Irving Place, New York, New York 10003. Tel.: 212-460-4600. Internet: www.conedison.com

382 385 366 Fixed Charge Cov. (%) ANNUAL RATES Past Past Est'd '12-'14 of change (per sh) 10 Yrs. to '18-'20 -2.5% 4.5% 2.5% Revenues .5% 3.0% 4.0% 3.5% 'Cash Flow' 5.0% 3.0% Earnings Dividends Book Value 1.0% 4.0% 1.0% 3.5% 2.5% 3.5%

% Change Customers (vr-end)

14344

NMF

NA

14883

NMF

NA

NMF

13568 NMF NA

Cal-	QUAR	TERLY RE	VENUES (	\$ mill.)	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	3078	2771	3438	2901	12188
2013	3306	2767	3440	2868	12381
2014	3789	2911	3390	2829	12919
2015	3616	2984	3500	3000	13100
2016	3750	3050	3600	3100	13500
Cal-	EA	RNINGS F	ER SHARI	ΕA	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	.94	.73	1.49	.70	3.86
2013	1.16	.49	1.49	.79	3.93
2014	1.23	.63	1.49	.28	3.62
2015	1.26	.65	1.50	.59	4.00
2016	1.20	.70	1.55	.65	4.10
Cal-	QUAR'	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.60	.60	.60	.60	2.40
2012	.605	.605	.605	.605	2.42
2013	.615	.615	.615	.615	2.46
2014	.63	.63	.63	.63	2.52
2015	.65				

Consolidated Edison's largest utility subsidiary has reached a settlement with the staff of the New York State **Public Service Commission (NYSPSC)** and some intervenors. Consolidated Edison Company of New York reached an agreement that would not raise base electric rates next year, but would benefit its earnings by allowing the utility to retain \$123 million of regulatory amortization in 2016. The agreement calls for an allowed ROE of 9.0% and a common-equity ratio of 48%. The NYSPSC must still issue a decision on the settlement.

Orange and Rockland Utilities is seeking electric and gas rate increases. O&R wants electric and gas tariff hikes of \$34.0 million and \$44.2 million, respectively, based on a 9.75% return on a 48% common-equity ratio. However, NYSPSC's staff is recommending an electric decrease of \$0.2 million and a gas raise of \$14.7 million, based on an 8.5% ROE. New rates should go into place on November 1st.

We have raised our 2015 earnings estimate by a nickel a share. First-quarter profits were greater than we expected be-

cause colder-than-normal winter weather helped ConEd's steam business. (The electric and gas operations have regulatory mechanisms that decouple revenues and volume.) The company revised its earnings guidance from \$3.80-\$4.00 a share to \$3.90-\$4.05, and our estimate of \$4.00 is within this range.

We forecast a modest bottom-line increase in 2016. We assume that the aforementioned regulatory settlement is approved, and that O&R gets a reasonable order in its pending rate case.

The company faces uncertainty about a pipeline explosion in New York in March of 2014. The accident killed eight people and injured dozens more. The National Transportation Safety Board and the NYSPSC are conducting investigations. ConEd is facing some litigation, but believes its insurance is sufficient to cover this, and has not yet taken a reserve.

This high-quality stock offers a re**spectable dividend yield.** The yield is above the utility average. Total return potential to 2018-2020 is average for a utility

Paul E. Debbas, CFA May 22, 2015

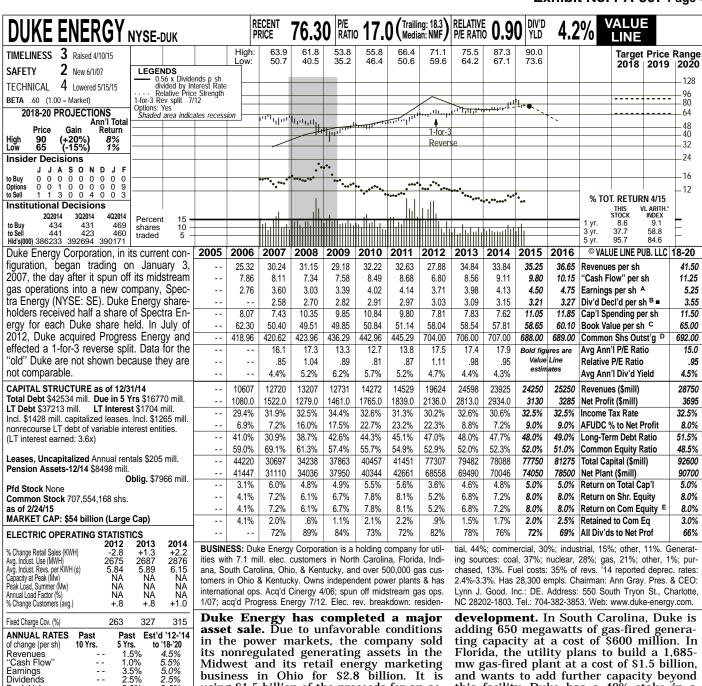
(A) Diluted EPS. Excl. nonrec. gain (losses): '02, (11¢); '03, (45¢); '13, (32¢); '14, 9¢; gain on disc. ops.: '08, \$1.01. '14 EPS don't add due to rounding. Next earnings report due early

Aug. (B) Div'ds historically paid in mid-Mar.,
June, Sept., and Dec. ■ Div'd reinvestment
plan avail. (C) Incl. intang. In '14: \$33.50/sh.
(D) In mill. (E) Rate base: net orig. cost. Rate

| Aug. (B) Div'ds historically paid in mid-Mar.,
| all'd on com. eq. for CECONY in '14: 9.2%
| elec., 9.3% gas & steam; O&R in '12 (elec.)
| 9.4%, in '09 (gas) 10.3%; earned on avg. com.
| eq., '14: 8.6%. Regulatory Climate: Below Avg. © 2015 Value Line Publishing LLC. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence **Earnings Predictability** 85

To subscribe call 1-800-VALUELINE



business in Ohio for \$2.8 billion. It is using \$1.5 billion of the proceeds for an accelerated stock buyback, and retaining the rest of the cash in place of debt issuances. Duke wrote down this discontinued operation last year in anticipation of a sizable loss on the sale.

The company has decided to retain its international operations. However, this segment faces a challenging year due to the stronger dollar and unfavorable conditions (both hydro and economic) in Brazil.

Duke expects to complete an asset acquisition by yearend. The company has agreed to pay \$1.2 billion for another utility's 700-megawatt stake in nuclear and coal-fired facilities in North Carolina. Various regulatory approvals are required. Management expects the purchase to boost annual earnings by \$0.05-\$0.10 a share. We will not reflect this in our figures until after the deal has been completed.

Other projects are in various stages of

this facility. Duke has a 40% stake in a proposed \$4.5 billion-\$5.0 billion pipeline. However, the company had a setback in Indiana, where the regulators rejected a proposed seven-year, \$1.9 billion

system modernization plan.

We look for solid earnings growth in 2015 and 2016. Duke is seeing modest growth at its regulated utility operations. The use of the cash from the aforementioned asset sale is another plus. The company is still incurring some costs associated with the takeover of Progress Energy in 2012 (\$0.18 a share last year and \$0.02 a share in the first quarter of 2015), but these are diminishing, while the merger-related benefits should ramp up.

The dividend yield of this stock is a cut above the utility mean. Total return potential to 2018-2020 is only about aver-

age for the group.

Paul E. Debbas, CFA May 22, 2015

(A) Dil. EPS. Excl. nonrec. losses: '12, 70¢; '13, 24¢; '14, 67¢; gains (loss) on disc. ops.: '12, 6¢; '13, 2¢; '14, (80¢); '15, 13¢. '12 & '13 EPS don't add due to chng. in shs. or rounding.

3.0%

5695

6112

5559

5785

6050

Dec.31

.59

.94

.81

.91

.95

Dec.31

.765

.78

QUARTERLY REVENUES (\$ mill.)

Mar.31 Jun.30 Sep.30 Dec.31

EARNINGS PER SHARE A

Jun.30 Sep.30

QUARTERLY DIVIDENDS PAID B =

6722

6709

6395

6800

7100

1.01

1.40

1.25

1.60

1.65

Sep.30

.765

.78

.795

3577

5879

5708

5600

5850

.99

.74

.90

.95

Jun.30

.735

.75

.765

1.02

2.0%

Full

Year

19624

24598

23925

24250

25250

Full

Year

3.71

3.98

4.13

4.50

4.75

Full

2.97

3.03

3.09

3.15

**Book Value** 

3630

5898

6263

6065

6300

Mar.31

.86

.89

1.05

1.09

1.20

Mar.31

.735

.75

.765

.78

Cal-

endar

2012

2013

2014

2015

2016

Cal-

endar

2012

2013

2014

2015

2016

Cal-

endar

2011

2012

2013

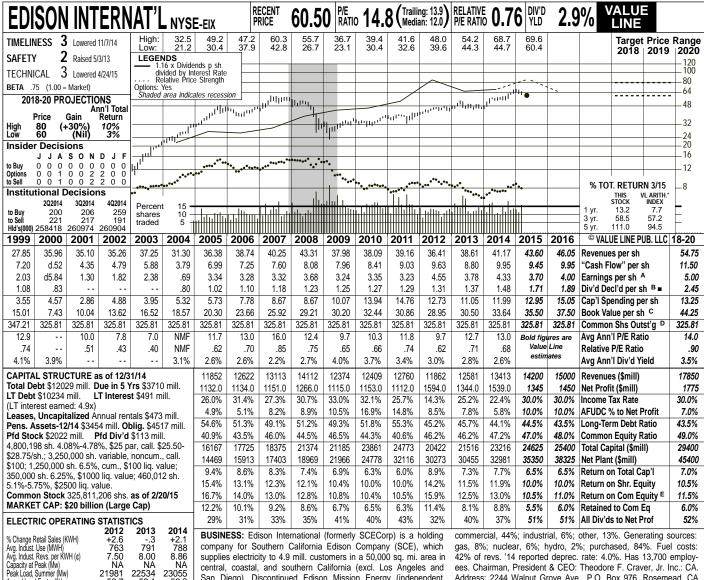
2014

2015

Next egs. report due early Aug. (B) Div'ds paid mid-Mar., June, Sept., & Dec. ■ Div'd reinv. plan avail. (C) Incl. intang. In '14: \$38.94/sh. IN: 10.3%; earned on avg. com. eq., '14: 7.0%. (D) In mill., adj. for rev. split. (E) Rate base: Net © 2015 Value Line Publishing LLC. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product

Company's Financial Strength Stock's Price Stability Price Growth Persistence **Earnings Predictability** 

100 55



company for Southern California Edison Company (SCE), which supplies electricity to 4.9 mill. customers in a 50,000 sq. mi. area in central, coastal, and southern California (excl. Los Angeles and San Diego). Discontinued Edison Mission Energy (independent power producer) in '12. Elec. revenue breakdown: residential, 37%;

gas, 8%; nuclear, 6%; hydro, 2%; purchased, 84%. Fuel costs: 42% of revs. '14 reported deprec. rate: 4.0%. Has 13,700 employees. Chairman, President & CEO: Theodore F. Craver, Jr. Inc.: CA. Address: 2244 Walnut Grove Ave., P.O. Box 976, Rosemead, CA 91770. Tel.: 626-302-2222. Internet: www.edison.com.

308 295 306 Fixed Charge Cov. (%) **ANNUAL RATES** Past Past Est'd '12-'14 to '18-'20 of change (per sh) 10 Yrs. 1.0% -1.0% Revenues 6.0% 'Cash Flow" 3.5% 4.5% 3.5% 3.0% Earnings 10.0% Dividends Book Value 2.5% 2.0% 10.0% 6.0% 6.5%

% Change Customers (vr-end)

7.50

21981

+.4

8.00

22534

52.1

+.6

8.86

23055 52.3

+.6

Cal- endar	QUAR Mar.31	TERLY RE Jun.30	VENUES (	\$ mill.) Dec.31	Full Year
2012	2415	2653	3734	3060	11862
2013	2632	3046	3960	2943	12581
2014	2926	3016	4356	3115	13413
2015	3100	3200	4700	3200	14200
2016	3300	3400	4900	3400	15000
Cal-	EA	RNINGS P	ER SHARI	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	.54	.55	1.09	2.39	4.55
2013	.78	.78	1.41	.81	3.78
2014	.61	1.07	1.51	1.15	4.33
2015	.70	.70	1.55	.75	3.70
2016	.80	.80	1.60	.80	4.00
Cal-	QUART	TERLY DIV	IDENDS PA	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.32	.32	.32	.32	1.28
2012	.325	.325	.325	.325	1.30
2013	.3375	.3375	.3375	.3375	1.35
2014	.355	.355	.355	.355	1.42
2015	.4175	.4175			

Edison International's utility subsidiary is awaiting an order on its general rate case. Southern California Edison is asking the California Public Utilities Commission (CPUC) for rate increases of \$80 million in 2015, \$286 million in 2016, and \$315 million in 2017. On the other hand, the Office of Ratepayer Advocates (ORA) is proposing a large rate decrease for 2015. Whenever the CPUC issues its order, it will be retroactive to the start of this year. Note that management is not providing earnings guidance while the rate case is pending.

Regardless of the outcome of the rate case, earnings are likely to decline this year. In 2014, Edison International had some cost reductions that are not sustainable and booked some tax benefits. This made the year-to-year comparison difficult. We think results in 2015 will be closer to normal.

We forecast solid profit growth in **2016.** SCE has a large capital budget (funded in part with debt), and projects rate base growth of 7%-9% annually through 2017. This should produce similar earnings growth.

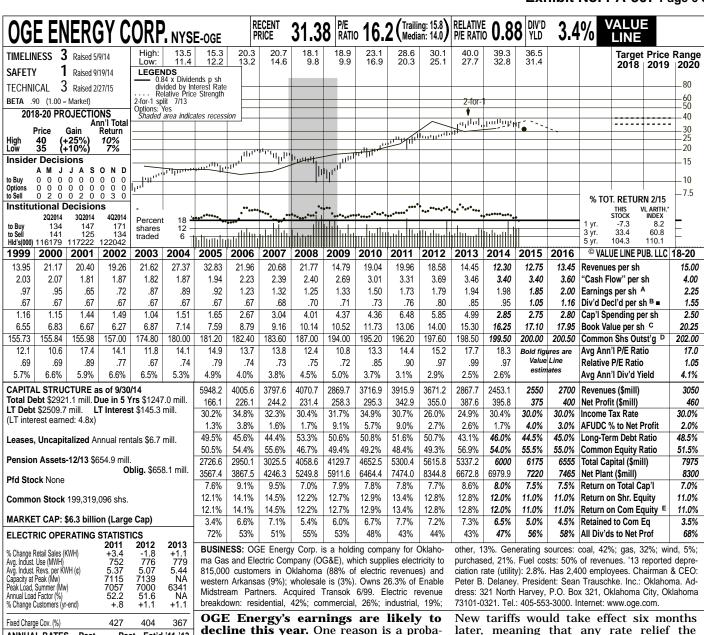
The San Onofre problem hasn't gone away. In 2013, SCE decided to retire the nuclear station after damage was found in both units following steam generator re-placements. The utility had to take a sizable writedown, but is recovering some costs associated with the plant in accordance with a settlement that the CPUC approved last November. However, the ORA and an intervenor group (each of which signed the settlement) want to overturn it due to the disclosure of an ex parte communication between a former SCE executive and the former CPUC president in March of 2013. In fact, the ORA is proposing that the utility should be forced to return a minimum of \$648 million to ratepayers. The company believes the settlement is fair and was negotiated properly. We aren't assuming an additional penalty. We are concerned about the regulatory risk the utility is facing—for both the rate case and San Onofre. Thus, we advise investors to look elsewhere, despite the company's superior dividend growth prospects through 2018-2020. Meanwhile, the dividend yield is low for a utility. Paul E. Debbas, CFA

(A) Diluted EPS. Excl. nonrec. gains (losses): '02, \$1.48; '03, (12¢); '04, \$2.12; '09, (64¢); '10, 54¢; '11, (\$3.33); '13, (\$1.12); gains (loss) from discont. ops.: '12, (\$5.11); '13, 11¢; '14,

57¢. '12 & '14 EPS don't add due to rounding. In '14: \$23.36/sh. (**D**) In mill. (**E**) Rate base: net Next earnings report due late July. (**B**) Div'ds paid late Jan., Apr., July, & Oct. ■ Div'd rein-10.45%; earned on avg. com. eq., '14: 13.8%. vestment plan avail. (C) Incl. deferred charges. | Regulatory Climate: Above Average.

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence **Earnings Predictability** 65

May 1, 2015



**ANNUAL RATES** Past Past Est'd '11-'13 of change (per sh) 10 Yrs. to '18-'20 Revenues -1.5% -4.0% NMF 6.5% 9.5% 8.5% 7.5% 3.0% 8.5% 'Cash Flow" 2.0% Earnings Dividends Book Value 10.0% 5.5%

Cal-	QUAR	TERLY RE	VENUES (	mill.)	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	840.7	855.0	1113.4	862.1	3671.2
2013	901.4	734.2	723.2	508.9	2867.7
2014	560.4	611.8	754.7	526.2	2453.1
2015	575	625	800	550	2550
2016	600	675	850	575	2700
Cal-	EA	RNINGS P	ER SHARE	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	.19	.48	.94	.20	1.79
2013	.12	.46	1.08	.29	1.94
2014	.25	.50	.94	.29	1.98
2015	.20	.50	.95	.20	1.85
2016	.20	.55	1.05	.20	2.00
Cal-	QUAR1	ERLY DIV	IDENDS PA	(IDB∎	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.1875	.1875	.1875	.1875	.75
2012	.19675	.19675	.19675	.19675	.79
2013	.20875	.20875	.20875	.20875	.84
2014	.225	.225	.225	.25	.93
2015	.25				

decline this year. One reason is a probable falloff in equity income from the company's 26.3% stake in Enable Midstream Partners, an oil and gas master limited partnership. Enable has seen a decline in the rig count in its operating area, and although most of its business is fee-based, the drop in commodity prices is another negative factor. Another reason is regula-tory lag at Oklahoma Gas and Electric, due to higher depreciation, unrecovered transmission costs, and the ending of a wholesale power contract. We slashed our earnings estimate by \$0.25 a share, to \$1.85. Our revised estimate is within OGE's guidance of \$1.76-\$1.89.

The utility is awaiting a ruling from the Oklahoma Corporation Commission (OCC) on its environmental compliance plan. OG&E plans to spend \$1.1 billion through 2019 to comply with EPA mandates. The utility would recover these costs through riders on customers' bills. After the OCC has issued its decision, OG&E will file a general rate case (probably in the June quarter) to address the aforementioned reasons for regulatory lag.

later, meaning that any rate relief the company gets this year will come too late to help lift profits much in 2015. OG&E is also planning a rate case in Arkansas, possibly by the end of the current quarter.

We look for earnings to recover next year. We assume reasonable regulatory treatment, and that the contribution from Enable will be greater than in 2015 (but not back to the 2014 level).

OGE still intends to increase the dividend at an annual rate of 10% through **2019.** We note that the percentage decline in expected distributions from Enable isn't nearly as large as that of expected equity income. In addition, OGE's low payout ratio and solid finances give the board of directors the wherewithal to increase the disbursement rapidly.

This high-quality stock is suitable for investors seeking dividend growth. The quotation has fallen 12% so far in 2015, which has been a weak year for most utility issues. Even after the pullback, though, the dividend yield is a cut below the utility average.

Paul E. Debbas, CFA

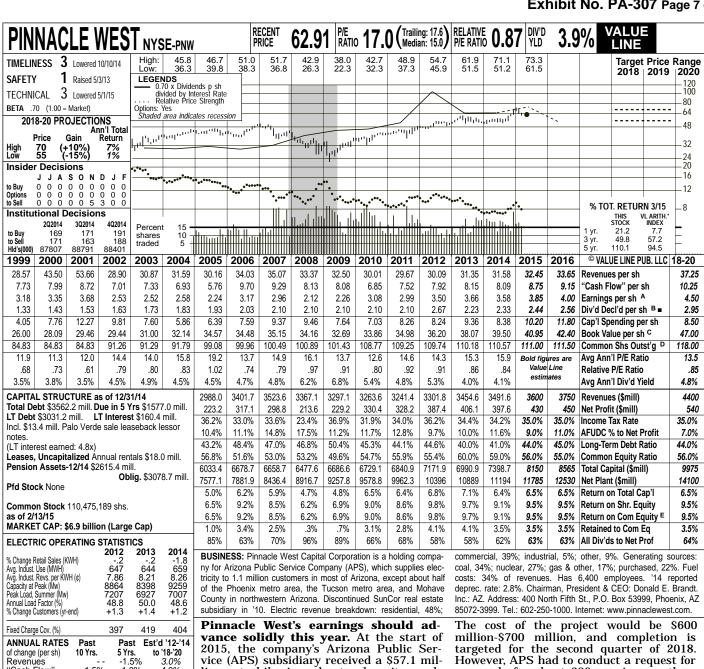
March 20, 2015

(A) Diluted EPS. Excl. nonrecurring losses: '02, 20¢; '03, 7¢; '04, 3¢; gains on discontinued operations: '02, 6¢; '05, 25¢; '06, 20¢. '13 EPS don't add due to rounding. Next earnings report

due early May. (B) Div'ds historically paid in late Jan., Apr., July, & Oct. ■ Div'd reinvestment plan available. (C) Incl. deferred charges.

(E) Rate base: Net original cost. Rate allowed on com. eq. in Oklahoma in '12: 10.2%; in Arkansas in '11: 9.95%; earned on avg. com. In '13: \$1.91/sh. (D) In millions, adj. for split. eq., '13: 13.2%. Regulatory Climate: Average.

Company's Financial Strength Stock's Price Stability A+ 90 Price Growth Persistence **Earnings Predictability** 95



'Cash Flow' 4.0% 4.0% Earnings 8.0% 3.0% 2.0% Dividends Book Value 3.5% 3.5%

Cal-	QUAR	TERLY RE	VENUES (	\$ mill.)	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	620.6	878.6	1109.5	693.1	3301.8
2013	686.6	915.8	1152.4	699.8	3454.6
2014	686.2	906.3	1172.7	726.4	3491.6
2015	700	950	1200	750	3600
2016	725	1000	1250	775	3750
Cal-	EA	RNINGS	PER SHARI	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	d.07	1.12	2.21	.24	3.50
2013	.22	1.18	2.04	.22	3.66
2014	.14	1.19	2.20	.05	3.58
2015	.20	1.25	2.20	.20	3.85
2016	.20	1.30	2.30	.20	4.00
Cal-	QUAR	TERLY DIV	IDENDS P	AID B =	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.525	.525	.525	.525	2.10
2012	.525	.525	.525	.545	2.12
2013	.545	.545	.545	.5675	2.20
2014	.5675	.5675	.5675	.595	2.30
2015	.595				

lion rate hike in order to place its newly purchased stake in Units 4 and 5 of the Four Corners coal-fired plant into the rate base. (Note that APS has reached a deal to buy another utility's 7% stake in these units.) The company benefits from regulatory mechanisms that provide for current cost recovery of some kinds of capital spending, such as transmission. Customer growth is above the industry average. We assume normal weather patterns - unfavorable weather reduced earnings by \$0.10 a share last year. Our earnings estimate is at the midpoint of management's targeted range of \$3.75-\$3.95 a share.

We forecast a modest profit increase in 2016. The utility will benefit from the same regulatory mechanisms as mentioned above. Customer growth should be another plus, as well.

The utility wants to add some gasfired generating capacity. APS would build 510 megawatts and retire 220 mw of old facilities, for a net increase of 290 mw.

proposals for about 300 mw in case there is a more attractive alternative. The winning bidder should be determined soon.

The company seeks to increase the grid access charge for solar users. Now about \$5 a month, APS wants the state commission to raise this to \$21. The utility is concerned about the subsidization of solar customers by nonsolar customers. There is no timetable for the regulators to act on APS' request.

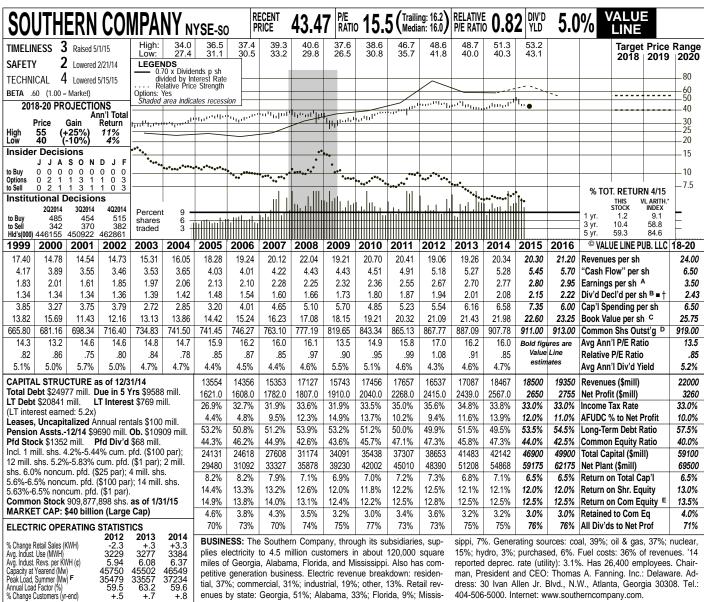
The stock price is down 13% since our January report. We think this is merely a correction. Three months ago, the quotation was above our 3- to 5-year Target Price Range. Even following the recent falloff, however, the stock is trading near the midpoint of our long-term price projection, thereby making total return prospects unexciting. Conservative accounts stressing income might like this equity for its dividend yield (slightly above the utility average) and top-notch Safety rank. Paul E. Debbas, CFA May 1, 2015

(A) Diluted EPS. Excl. nonrec. losses: '02, 77¢; '09, \$1.45; excl. gains (losses) from discontinued ops.: '00, 22¢; '05, (36¢); '06, 10¢; '08, 28¢; '09, (13¢); '10, 18¢; '11, 10¢; '12, (5¢).

reinvestment plan avail. (C) Incl. deferred Regulatory Climate: Average.

Next earnings report due early Aug. **(B)** Div'ds historically paid in early Mar., June, Sept., & base: Fair value. Rate allowed on com. eq. in Dec. There were 5 declarations in '12. • Div'd '12: 10%; earned on avg. com. eq., '14: 9.3%.

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence **Earnings Predictability** 65



tial, 37%; commercial, 31%; industrial, 19%; other, 13%. Retail revenues by state: Georgia, 51%; Alabama, 33%; Florida, 9%; Missisdress: 30 Ivan Allen Jr. Blvd., N.W., Atlanta, Georgia 30308. Tel.: 404-506-5000. Internet: www.southerncompany.com.

423 417 Fixed Charge Cov. (%) 416 **ANNUAL RATES** Past Past Est'd '12-'14 5 Yrs. of change (per sh) 10 Yrs. to '18-'20 -1.0% Revenues 2.5% 3.5% 4.0% 3.5% 4.0% 3.5% 3.5% 4.0% 4.5% 3.5% 4.5% 3.0% 3.0% Cash Flow" Earnings Dividends Book Value

% Change Customers (yr-end)

63.2

					,.
Cal- endar	QUA Mar.31		EVENUES Sep.30		Full Year
2012	3604	4181	5049	3703	16537
2013	3897	4246	5017	3927	17087
2014	4644	4467	5339	4049	18499
2015	4183	4617	5550	4150	18500
2016	4400	4850	5800	4300	19350
Cal-	EA	RNINGS P	ER SHARE	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	.42	.71	1.11	.43	2.67
2013	.47	.66	1.08	.49	2.70
2014	.66	.68	1.09	.38	2.80
2015	.56	.69	1.15	.40	2.80
2016	.55	.80	1.20	.40	2.95
Cal-	QUART	<b>ERLY DIVI</b>	DENDS PA	IDB∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.455	.4725	.4725	.4725	1.87
2012	.4725	.49	.49	.49	1.94
2013	.49	.5075	.5075	.5075	2.01
2014	.5075	.525	.525	.525	2.08
2015	.525	.5425			

Southern Company's largest utility is experiencing delays and cost overruns in its nuclear construction. Georgia Power is building two units at its Vogtle station. The new facilities are now expected to come on line in the second quarters of 2019 and 2020 - 18 months later than previously expected. The company is engaged in talks with its contractors to determine who is responsible for the delays, and the ensuing cost increases. Additional costs associated with the delays are estimated at \$40 million a month. These are recoverable in rates (as long as they are deemed prudent), but not until after each unit is completed.

A regulatory settlement was overturned in Mississippi. This agreement provided rate relief for Mississippi Power, but imposed a \$2.88 billion cost cap on the coal gasification project that has had major delays and cost overruns. (The company took large writedowns in 2013 and 2014 as a result.) If the utility cannot reach a settlement, it is prepared to file a rate case soon, and would probably ask for a big increase.

We estimate a slight earnings increase

**this year.** First-quarter profits declined due to a comparison that was made tough by last year's weather patterns and an unusually low level of operating expenses. The rest of the year should be better, as the company is benefiting from some rate relief, economic growth in the region, and additional investments at the Southern Power nonutility subsidiary. Our 2015 earnings estimate is within management's targeted range of \$2.76-\$2.88 a share. We forecast that the positive factors will produce a mid-single-digit earnings increase next year.

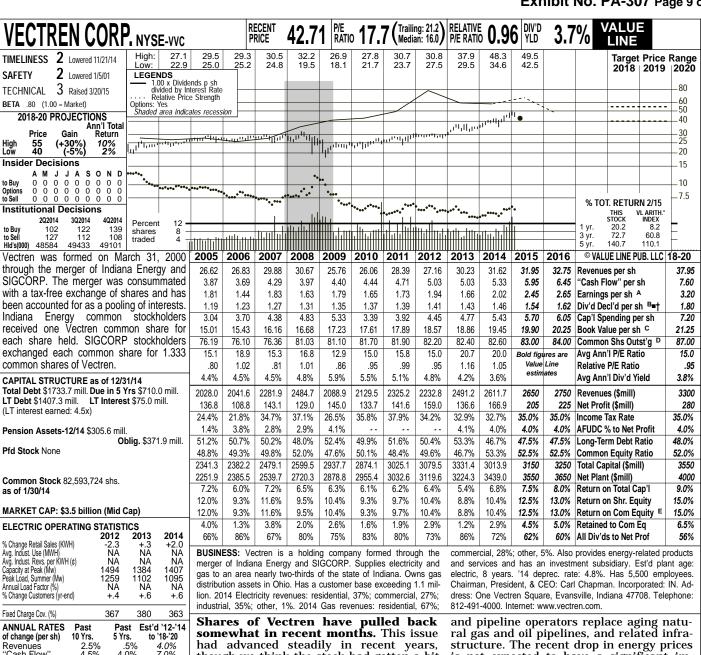
As expected, the board of directors raised the annual dividend by \$0.07 a share (3.3%) this quarter. This has been the growth rate in recent years, and we think it will continue through the end of the decade.

Southern Company stock has one of the highest dividend yields of any electric utility equity. The valuation reflects the uncertainties surrounding the large capital projects in Georgia and Mississippi. Total return prospects to 2018-2020 are a cut above the industry average. Paul E. Debbas, CFA May 22, 2015

(A) Diluted EPS. Excl. nonrec. gain (losses): '03, 6¢; '09, (25¢); '13, (83¢); '14, (59¢). '14 EPS don't add due to rounding. Next earnings report due late July. (B) Div'ds historically paid in early Mar., June, Sept., and Dec. ■ Div'd reinvest. plan avail. † Shareholder invest. plan avail. (C) Incl. def'd charges. In '14: \$7.92/sh. (D) In mill. (E) Rate base: AL, MS, fair value;

FL, GA, orig. cost. Allowed return on com. eq. (blended): 12.5%; earned on avg. com. eq., '14: 12.7%. Reg. Climate: GA, AL Above Average; MS, FL Average. (F) Winter peak in '14.

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence **Earnings Predictability** 100



4.0% 7.0% 9.5% Cash Flow 4.5% 2.0% 4.0% 1.5% Earnings 2.0% 2.5% 4.0% 2.0% 3.0% Book Value

Cal- QUARTERLY REVENUES (\$ mill.)

Gai-			T LITULU (		ruii
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year
2012	604.6	470.6	513.5	644.1	2232.8
2013	700.6	531.0	579.6	680.0	2491.2
2014	796.8	542.5	595.6	676.8	2611.7
2015	790	540	620	700	2650
2016	810	565	635	740	2750
Cal-	EA	RNINGS P	ER SHARE	Α	Full
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year
2012	.62	.31	.48	.53	1.94
2013	.61	d.07	.52	.60	1.66
2014	.62	.14	.57	.68	2.02
2015	.70	.40	.62	.73	2.45
2016	.75	.45	.67	.78	2.65
Cal-	QUART	ERLY DIV	DENDS PA	\ID B∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.345	.345	.345	.350	1.39
2012	.350	.350	.350	.355	1.41
2013	.355	.355	.355	.360	1.43
2014	.360	.360	.360	.380	1.46
2015	.380				
	1				1

though we think the stock had gotten a bit ahead of itself, following a run-up in price. The company posted a slight top-line decrease for the fourth quarter. Gas utility revenues advanced moderately for the period, but this was more than offset by declines in the electric utility and nonutility operations. Still, operating expenses fell slightly more than total revenue, and share earnings of \$0.68 compared favorably with the prior-year tally.

We envision solid performance going forward. The utility group ought to report good results. The gas utility segment should benefit from returns on the Ohio infrastructure replacement programs and modest customer growth. We also expect the electric utility services line to perform well. Elsewhere, we think the nonutility group will continue to benefit from strong performance at the infrastructure business. This line will probably experience healthy demand, assuming fairly normal weather. Construction activity should remain strong, as utilities, municipalities,

is not expected to have a significant impact on results in the current year, as infrastructure services markets typically lag economic changes by up to 12 months. This might affect results next year, though long-term trends still appear favorable in this market. The absence of commoditybased nonutility businesses (following the sale of Vectren Fuels last year) will probably also be a plus. Overall, we expect a moderate top-line advance and a strong share-earnings improvement for the company for full-year 2015. Healthy growth will probably continue from 2016 onward. This stock is favorably ranked for year-ahead performance. Conservative, income-seeking accounts may find some-thing to like here. Vectren offers a solid dividend yield, and earns good marks for

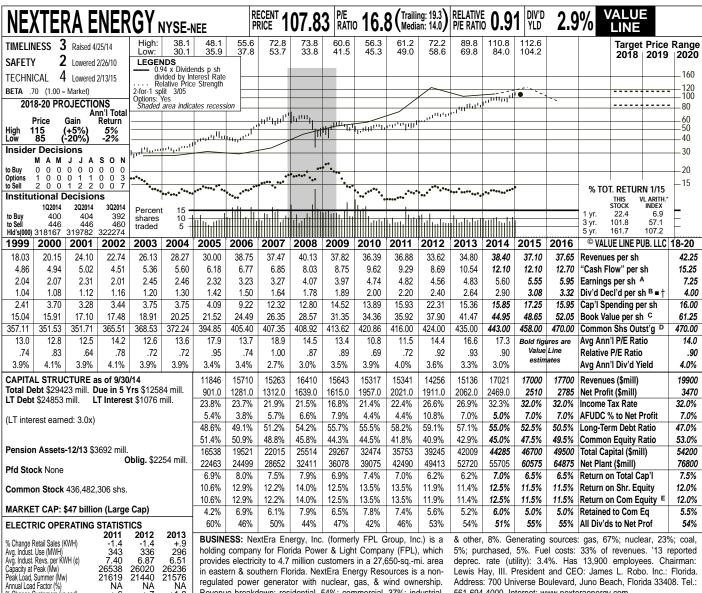
Safety, Financial Strength, Price Stability, and Earnings Predictability. But this appears to be reflected in the recent quotation, and long-term appreciation potential is subpar at this juncture.

Michael Napoli, ČFA March 20, 2015

(A) Diluted EPS. Excl. nonrecur. gain (loss): '09, 15¢. Earnings may not sum due to rounding. Next egs report due in May. (B) Div'ds historically paid in early March, June, September, and December. ■Div'd rein- fair value. Rates allowed on elect. common

vest. plan avail. † Shareholder invest. plan avail. (C) Incl. intang. In '14, \$6.34/sh. (D) In millions. (E) Electric rate base determination: Climate: Above Average.

Company's Financial Strength Stock's Price Stability Price Growth Persistence 95 60 Earnings Predictability



in eastern & southern Florida. NextEra Energy Resources is a nonregulated power generator with nuclear, gas, & wind ownership. Revenue breakdown: residential, 54%; commercial, 37%; industrial

Lewis Hay, III. President and CEO: James L. Robo. Inc.: Florida. Address: 700 Universe Boulevard, Juno Beach, Florida 33408. Tel.: 561-694-4000. Internet: www.nexteraenergy.com.

311 278 295 Fixed Charge Cov. (% ANNUAL RATES Past Past Est'd '11-'13 of change (per sh) 10 Yrs. to '18-'20 -2.0% 5.5% 6.0% Revenues 3.5% 2.5% 7.0% 6.5% 7.5% 7.0% 'Cash Flow" Earnings

% Change Customers (vr-end)

NA +.6

NA

+.7

+1.8

DOOK V	aiue	0.0	/0 /.	J /0	7.070
Cal- endar	QUAR Mar.31		VENUES ( Sep.30		Full Year
2012	3371	3667	3843	3375	14256
2013	3279	3833	4394	3630	15136
2014	3674	4029	4654	4664	17021
2015	4000	4250	4750	4000	17000
2016	4150	4450	4950	4150	17700
Cal-	EA	RNINGS P	ER SHARE	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	1.11	1.45	.98	1.02	4.56
2013	1.00	1.44	1.64	.75	4.83
2014	.98	1.12	1.50	2.00	5.60
2015	1.30	1.45	1.65	1.15	5.55
2016	1.40	1.55	1.75	1.25	5.95
Cal-	QUART	ERLY DIVI	DENDS PA	IDB∎†	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.55	.55	.55	.55	2.20
2012	.60	.60	.60	.60	2.40
2013	.66	.66	.66	.66	2.64
2014	.725	.725	.725	.725	2.90
2015					

NextEra Energy has agreed to acquire Hawaiian Electric Industries' three electric utility subsidiaries. NextEra would pay \$2.8 billion, mostly in stock, for the utilities. The purchase requires the approval of HEI shareholders, the Hawaii Public Utilities Commission, and the Federal Energy Regulatory Commission. The companies expect the deal to be completed by yearend. NextEra would bring its expertise in renewable energy to Hawaii, which wants to use more renewables and less oil. However, NextEra would be paying a high price for utilities that have underearned their allowed returns on equity—sometimes by a wide margin.

NextEra's regulated and nonregulated businesses are performing well. Florida Power & Light is benefiting from solid customer growth and the economic recovery in its service territory. NextEra Energy Resources adds renewable projects every year (1,629 megawatts in 2014).

Investors should not be concerned about the slight earnings decline we estimate for 2015. Last year, mark-tomarket accounting gains stemming from hedges boosted share net by \$0.35. This

will make the comparison tough, notably in the December quarter. We include these gains (or charges) in our presentation because they are an ongoing part of operations, but don't reflect them in our estimates and projections because they are impossible to predict. Our 2015 earnings estimate is within NextEra's targeted range of \$5.40-\$5.70 a share. We forecast a 7% earnings increase, to \$5.95, in 2016.

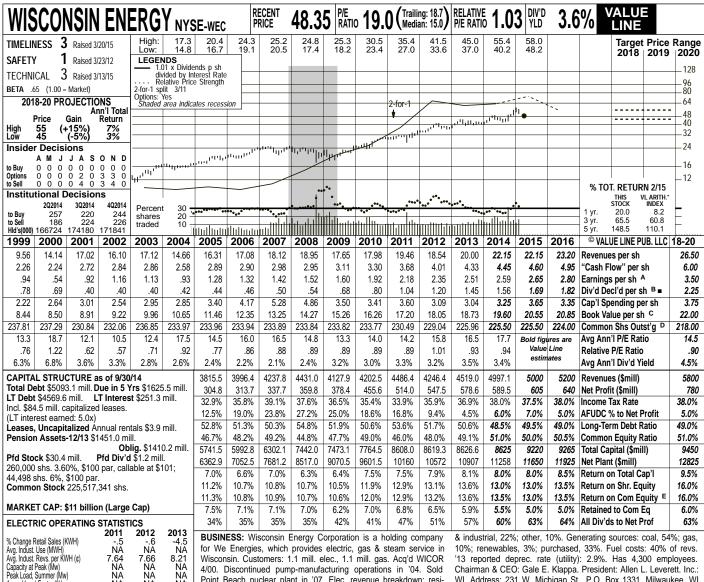
FPL is planning some investments in natural gas. The Florida commission approved a plan to invest in gas reserves in order to reduce costs for ratepayers. The utility also plans to invest at least \$2 billion in two gas pipeline joint ventures. We think the board of directors raised

the dividend shortly after this report went to press. The board has been hiking the payout at a fast pace in recent years. NextĔra's dividend yield is low for a utility. The valuation reflects the company's good track record and superior dividend growth potential. However, with the recent price above the midpoint of our 2018-2020 Target Price Range, total return potential is negligible Paul E. Debbas, CFA February 20, 2015

(A) Diluted EPS. Excl. nonrecurring gain (losses): '00, (5¢); '02, (60¢); '03, 5¢; '11, (24¢); '13, (80¢); gain on discontinued opera tions: '13, 44¢. Next earnings report due late April. (B) Div'ds historically paid in mid-Mar., mid-June, mid-Sept., & mid-Dec. ■ Div'd reinvestment plan avail. † Shareholder investment plan avail. (C) Incl. deferred charges. In '13:

\$5.18/sh. **(D)** In millions, adjusted for stock split. **(E)** Rate allowed on com. eq. in '13: 9.5%-11.5%; earned on avg. com. eq., '13: 12.1%. Regulatory Climate: Average.

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence 70 **Earnings Predictability** 80



4/00. Discontinued pump-manufacturing operations in '04. Sold Point Beach nuclear plant in '07. Elec. revenue breakdown: residential, 36%; small commercial & industrial, 32%; large commercial

Chairman & CEO: Gale E. Klappa. President: Allen L. Leverett. Inc.: WI. Address: 231 W. Michigan St., P.O. Box 1331, Milwaukee, WI 53201. Tel.: 414-221-2345. Internet: www.wisconsinenergy.com.

336 377 414 Fixed Charge Cov. (% **ANNUAL RATES** Past Past Est'd '11-'13 of change (per sh) 10 Yrs. to '18-'20 Revenues 1.5% 1.5% 4.5% 'Cash Flow" 3.5% 8.0% 6.5% 10.5% 6.0% Earnings Dividends Book Value 19.5% 6.0% 9.0% 3.0%

% Change Customers (vr-end)

NA

NA +.2

NA

+.3

Cal- endar	QUAR Mar.31		VENUES (S Sep.30		Full Year
2012	1191.2	944.7	1039.3	1071.2	4246.4
2013	1275.2	1012.3	1053.2	1178.3	4519.0
2014	1695.0	1043.7	1033.3	1225.1	4997.1
2015	1500	1100	1150	1250	5000
2016	1550	1150	1200	1300	5200
Cal-	EA	RNINGS P	ER SHARE	Α	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	.74	.51	.67	.43	2.35
2013	.76	.52	.60	.63	2.51
2014	.91	.58	.56	.53	2.59
2015	.77	.56	.68	.64	2.65
2016	.82	.59	.72	.67	2.80
Cal-	QUART	ERLY DIV	IDENDS PA	/ID B ■	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.26	.26	.26	.26	1.04
2012	.30	.30	.30	.30	1.20
2013	.34	.34	.3825	.3825	1.45
2014	.39	.39	.39	.39	1.56
2015	.4225				

Wisconsin Energy is seeking regulatory approval for its takeover of In**tegrys Energy.** The company would buy Integrys for \$4.4 billion in stock and \$1.5 billion in cash (which would be financed with debt). Integrys would fit well with Wisconsin Energy because it provides electric and gas service in the state, and would provide the company with gas service in Illinois and Minnesota. In addition, Wisconsin Energy would wind up with a 60% stake in American Transmission Company, up from 26% now. The acquisition requires the approval of the commissions in Wisconsin, Illinois, Michigan, and Minnesota, plus that of the Federal Energy Regulatory Commission. The companies are targeting the second half of 2015 for completion of the deal. Wisconsin Energy would change its name to WEC Energy upon closing.

Management believes the combination would enhance the company's growth rate, now 4%-6%. Wisconsin Energy expects 5%-7% with the addition of Integrys. Wisconsin Energy shareholders (who saw an 8.3% dividend hike in early 2015) can expect another increase upon

closing, so that Integrys shareholders can maintain their dividend income.

A rate order was issued in late 2014. Base electric rates will rise by \$43.2 million this year. Gas rates will rise by \$6.4 million in 2015 and \$21.4 million in 2016. Steam rates will climb by \$1.7 million this year. This should help Wisconsin Energy's profits improve in 2015. Note that our estimate of \$2.65 a share is below the company's guidance of \$2.67-\$2.77, which excludes merger-related costs that we include. Moreover, our estimates and projections will not include Integrys until the takeover has been completed.

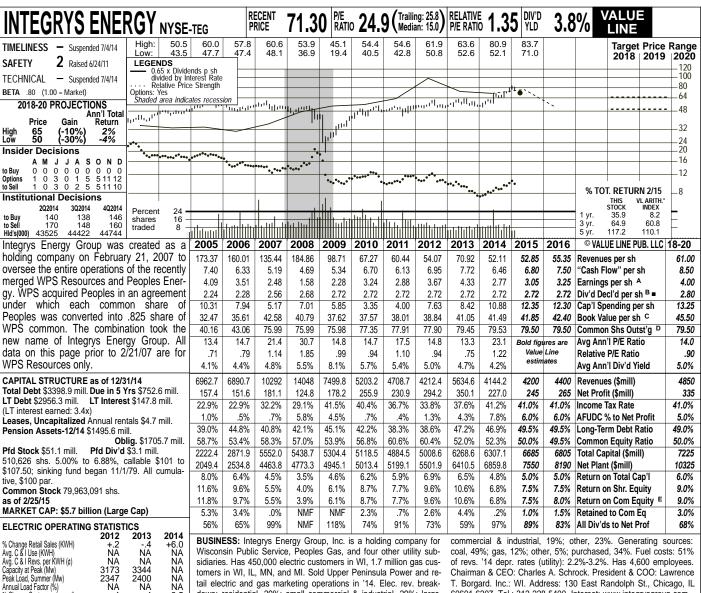
We estimate higher earnings in 2016. Gas rate relief and modest volume growth should benefit the utility. Also, we assume no merger-related costs and a resumption of a share-repurchase plan in our forecast. Our profit estimate is \$2.80 a share.

Top-quality Wisconsin Energy stock has a dividend yield that is about average for a utility. Total return potential to 2018-2020 is unspectacular, but our projections might well be raised with the addition of Integrys Paul E. Debbas, ČFA March 20, 2015

(A) Diluted EPS. Excl. nonrec. gains (losses): '99, (5¢); '00, 10¢ net; '02, (44¢); '03, (10¢) net; '04, (42¢); gains on disc. ops.: '04, 77¢; '05, 2¢; '06, 2¢; '09, 2¢; '10, 1¢; '11, 6¢. '14

EPS don't add due to rounding. Next earnings report due early May. (B) Div'ds historically paid in early Mar., June, Sept. & Dec. ■ Div'd WI in '15: 10.2%-10.3%; earned on avg. com. reinvestment plan avail. (C) Incl. intang. In '13: eq., '13: 13.6%. Regulat. Climate: Above Avg.

Company's Financial Strength Stock's Price Stability 100 Price Growth Persistence **Earnings Predictability** 95



2400 NA +.4 -9.5 410 254 Est'd '12-'14 Past 5 Yrs. to '18-'20

Revenues "Cash Flow" -6.0% -16.0% 7.0% 1.0% 1.0% 2.5% 3.0% Earnings Dividends 11.0% 2.0% **Book Value** 4.0% 2.0% QUARTERLY REVENUES (\$ mill.) Callun 30 San 30

Past

10 Yrs.

ΝA

367

% Change Customers (yr-end)

Fixed Charge Cov. (%

of change (per sh)

ANNUAL RATES

endar	IVIAI.S I	Jun.30	oep.su	Dec.31	rear
2012	1247.9	839.6	927.7	1197.2	4212.4
2013	1678.2	1116.0	1129.7	1710.7	5634.6
2014	1638.0	836.8	657.1	1012.3	4144.2
2015	1600	850	700	1050	4200
2016	1700	875	725	1100	4400
Cal-	EA	RNINGS P	ER SHARI	A	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2012	1.24	.65	.93	.86	3.67
2013	2.29	d.06	.47	1.63	4.33
2014	1.73	.10	.27	.66	2.77
2015	1.80	.10	.30	.85	3.05
2016	1.90	.10	.35	.90	3.25
Cal-	QUART	ERLY DIV	IDENDS PA	AID B ■	Full
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year
2011	.68	.68	.68	.68	2.72
2012	.68	.68	.68	.68	2.72
2013	.68	.68	.68	.68	2.72
2014	.68	.68	.68	.68	2.72
2015	.68				

tail electric and gas marketing operations in '14. Elec. rev. breakdown: residential, 29%; small commercial & industrial, 29%; large

Integrys Energy is awaiting regulatory approval for the company to be acquired by Wisconsin Energy. Integrys stockholders would receive \$18.58 in cash and 1.128 shares of Wisconsin Energy stock for each of their shares, making the deal worth \$73.12 a share at Wisconsin Energy's recent price. The transaction requires the approval of the regulators in Wisconsin, Illinois, Michigan, and Minnesota, plus that of the Federal Energy Regulatory Commission. The companies expect it to close in the second half of 2015. The Timeliness rank of Integrys stock is suspended due to the takeover agreement. We continue to advise Integrys holders to sell their shares on the open market. The recent price is less than 3% below the value of the buyout price, so there is little upside potential unless the price of Wisconsin Energy stock rises. By selling, Integrys holders avoid downside risk in case the deal fails to win regulatory approval or utility weaken—as they have so far in 2015.

Integrys' utilities received some rate **hikes in the first quarter.** Wisconsin Public Service's electric rates were raised T. Borgard. Inc.: WI. Address: 130 East Randolph St., Chicago, IL 60601-6207. Tel.: 312-228-5400. Internet: www.integrysgroup.com.

by \$24.6 million and its gas tariffs were lowered by \$15.4 million, based on a 10.2% return on equity. The Illinois commission granted Peoples Gas and North Shore Gas a total of \$74.6 million, based on a 9.05% ROE. Rate relief should help Integrys' earnings advance this year and next, since the orders in Illinois didn't take effect until late February

Wisconsin Public Service is seeking a certificate of need to build a gas-fired generating unit. The utility wants to add a 400-megawatt facility at the site of an existing plant at an expected cost of \$517 million. A ruling from the state commission is expected in the second half of 2015. Other major capital projects are already under way. A coal-fired unit is undergoing an environmental upgrade at a cost of \$345 million. A system modernization and reliability project is budgeted for \$220 million. In Illinois, the company expects to spend \$2.2 billion-\$2.6 billion over a 10-year period to replace aging gas pipelines. The utility receives current cost recovery of these expenditures through a regulatory mechanism. Paul E. Debbas, CFA March 20. 2015

(A) Dil. EPS. Excl. nonrecur. gain (losses): '09, (\$3.24); '10, (41¢); '14, 64¢; gains (losses) from disc. ops.: '07, \$1.02; '08, 6¢; '09, 4¢; '11, (1¢); '12, (12¢); '13, 6¢; '14, 2¢. '12 & '14 EPS

don't add due to rounding. Next egs. due early May. (B) Div'ds histor. paid mid-Mar., June, Sept., & Dec. • Div'd reinv. plan avail. (C) Incl.

base: Net orig. cost. Rate all'd on com. eq. in WI in '15: 10.2%; in IL in '15: 9.05%; in MN in '14: 9.35%; earn. on avg. com. eq, '14: 6.8%. intang. In '14: \$27.27/sh. (D) In mill. (E) Rate Regul. Climate: WI, Above Avg.; IL, Below Avg.

Company's Financial Strength Stock's Price Stability Price Growth Persistence 90 45 **Earnings Predictability** 

## Exhibit No. PA-308. Page 1 of 9

### Stock Price Data in Date Order for Yield Calculation/Raw Price Data

										Elim/N	/Ierger/A	Acq.
Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
5/29/2015	50.35	61.30	61.84	75.73	60.81	31.50	60.92	43.69	42.57	71.91	48.28	102.34
5/28/2015	50.13	61.46	61.81	75.95	61.05	31.53	61.18	43.51	42.77	71.94	48.33	102.27
5/27/2015	49.64	61.26	61.34	76.21	60.78	31.45	61.15	43.73	42.42	71.99	48.30	100.83
5/26/2015	49.25	60.68	61.07	75.76	60.46	31.23	60.57	43.30	42.00	72.25	48.24	100.26
5/22/2015	49.59	61.21	61.14	76.05	60.74	31.60	60.98	43.23	42.26	72.46	48.34	101.45
5/21/2015	49.59	61.33	61.37	76.16	60.83	31.72	61.09	43.38	42.55	72.83	48.70	101.38
5/20/2015	49.08	61.40	61.38	76.54	60.81	31.83	60.96	43.67	42.86	72.96	48.73	101.74
5/19/2015	48.96	61.26	61.14	76.19	60.58	31.81	60.78	43.67	42.57	72.55	48.23	101.73
5/18/2015	48.65	61.23	61.05	76.03	60.77	32.04	60.56	43.65	42.55	71.85	48.26	101.52
5/15/2015	48.43	61.00	60.82	76.15	60.44	31.99	59.96	43.72	42.36	71.56	48.00	101.36
5/14/2015	48.33	60.27	60.45	75.49	59.75	31.72	59.38	43.18	41.91	70.81	47.55	100.31
5/13/2015	48.06	59.47	59.60	74.44	58.84	31.21	58.60	42.84	41.04	69.93	46.84	99.44
5/12/2015	48.32	59.90	60.48	75.51	59.52	31.24	59.53	42.93	41.38	70.66	47.31	99.15
5/11/2015	48.36	60.09	60.86	75.77	60.27	31.82	59.48	43.04	41.87	70.94	47.47	99.25
5/8/2015	48.36	60.26	60.43	76.31	60.67	31.96	59.86	43.60	41.95	71.41	47.67	100.44
5/7/2015	48.60	60.29	60.59	76.01	60.14	31.96	59.74	43.68	41.69	71.26	47.38	99.83
5/6/2015	48.74	60.19	60.45	75.61	59.60	32.00	59.40	43.53	41.65	70.66	47.23	99.27
5/5/2015	49.02	60.44	60.18	75.46	60.37	32.01	59.62	43.72	41.97	71.23	47.55	99.39
5/4/2015	49.85	61.87	61.44	77.15	61.92	32.60	61.08	44.42	43.16	73.33	49.41	101.98
5/1/2015	49.42	61.01	61.01	77.09	61.54	32.37	60.48	44.26	42.85	72.94	49.16	101.10
4/30/2015	50.30	60.47	61.55	77.57	60.94	32.68	61.20	44.30	43.17	73.10	49.12	100.93
4/29/2015	51.27	61.76	62.08	78.43	62.01	32.81	62.22	44.65	43.94	73.59	49.90	102.70
4/28/2015	51.66	62.22	62.27	78.97	61.66	32.42	62.82	44.66	44.30	74.14	50.34	104.10
4/27/2015	51.15	61.76	61.69	78.37	61.01	32.06	62.38	44.32	43.94	73.82	50.21	103.82
4/24/2015	51.54	62.77	62.50	79.41	61.58	32.45	63.15	44.87	44.89	74.45	51.11	105.05
4/23/2015	51.08	62.32	62.10	78.86	60.44	32.43	62.85	44.69	44.35	73.83	50.66	104.28
4/22/2015	50.65	62.20	61.64	78.30	60.01	32.32	62.30	44.48	44.05	73.23	50.28	103.29
4/21/2015	50.87	62.05	61.47	78.07	60.50	32.41	62.31	44.42	43.84	73.05	50.17	103.40
4/20/2015	51.59	62.52	61.80	78.61	61.65	32.86	62.80	44.76	44.23	73.44	50.33	104.50
4/17/2015	50.94	61.60	60.94	77.31	61.07	32.67	62.06	44.11	43.50	72.28	49.54	103.15
4/16/2015	51.38	61.82	60.91	77.31	61.68	32.21	62.12	44.11	43.63	72.37	49.45	103.76
4/15/2015	51.49	62.26	60.76	78.02	62.49	32.48	62.44	44.20	43.84	72.67	49.70	104.18
4/14/2015	51.44	62.45	60.82	77.59	62.99	32.21	62.74	44.35	43.99	72.44	49.78	104.36
4/13/2015	51.15	62.19	60.46	77.23	62.81	31.95	62.09	44.20	43.70	72.26	49.43	103.75
4/10/2015	51.83	62.58	60.86	77.84	63.79	32.07	63.18	44.62	44.32	72.71	49.65	104.90
4/9/2015	51.57	61.96	60.26	77.01	63.37	31.62	62.02	44.47	43.83	71.68	49.05	104.01
4/8/2015	51.86	61.97	60.60	77.30	63.71	31.62	62.52	44.34	44.04	72.07	49.36	104.04
4/7/2015	51.86	62.05	60.59	77.65	63.73	31.66	62.60	44.26	44.15	72.26	49.54	104.29
4/6/2015	52.68	63.09	61.55	78.24	64.24	32.09	63.81	44.92	44.94	73.03	50.23	105.54
4/2/2015	52.36	62.35	60.95	76.97	63.04	31.76	63.06	44.64	44.59	72.57	49.79	104.75
4/1/2015	52.79	62.30	61.15	76.83			63.43	44.62	44.48	72.66	49.93	104.76
= 5 = 0												

# Exhibit No. PA-308, Page 2 of 9

### Stock Price Data in Date Order for Yield Calculation/Raw Price Data

Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
3/31/2015	52.76	63.00	61.00	76.78	62.47	31.61	63.75	44.28	44.14	72.02	49.50	104.05
3/30/2015	52.67	62.58	60.79	75.90	63.04	31.85	63.80	44.33	44.21	72.10	49.73	104.74
3/27/2015	52.40	61.64	59.80	75.00	62.18	31.52	63.05	44.01	43.76	71.95	49.45	103.54
3/26/2015	52.19	61.30	58.80	74.35	61.81	31.31	62.56	43.76	43.41	71.57	48.87	102.72
3/25/2015	52.96	62.02	60.58	74.96	62.16	31.50	63.05	44.03	43.96	72.13	49.09	103.42
3/24/2015	53.23	62.54	60.88	76.06	62.71	31.91	63.90	44.52	44.36	73.02	49.62	104.84
3/23/2015	53.61	63.43	61.53	76.80	63.79	32.29	64.82	45.17	44.62	74.01	50.17	105.74
3/20/2015	53.47	63.58	61.47	76.67	63.74	32.45	64.73	44.97	44.77	74.33	50.19	105.99
3/19/2015	53.02	62.72	60.84	76.01	64.38	31.76	63.99	44.66	44.11	73.67	49.63	105.48
3/18/2015	53.90	63.02	62.09	76.40	65.05	32.29	64.87	45.14	44.60	73.73	49.92	106.90
3/17/2015	52.80	61.69	61.17	75.08	63.09	31.43	63.33	44.32	43.06	72.04	48.70	103.28
3/16/2015	53.39	61.79	61.72	75.71	63.73	31.50	63.25	44.63	43.38	72.55	49.06	102.97
3/13/2015	52.59	60.52	60.84	74.61	62.41	31.24	62.08	43.95	42.79	71.23	48.21	100.61
3/12/2015	53.02	61.15	61.40	75.28	62.63	31.49	63.00	44.46	43.49	71.53	48.56	100.52
3/11/2015	51.90	60.31	59.72	74.28	61.58	31.19	61.80	43.72	42.67	70.58	47.82	97.98
3/10/2015	52.12	60.67	60.08	74.70	61.65	31.38	62.26	43.93	42.71	71.30	48.35	97.99
3/9/2015	52.14	60.70	60.42	74.76	61.38	31.67	62.10	44.01	42.91	71.83	48.62	98.93
3/6/2015	51.64	60.25	59.98	74.96	60.91	31.66	61.97	44.09	42.70	71.29	48.40	98.70
3/5/2015	53.14	62.20	62.32	77.58	63.39	32.22	63.53	45.02	44.00	73.43	50.48	102.13
3/4/2015	52.76	62.09	61.87	77.08	63.02	31.72	63.07	44.83	43.88	72.46	49.94	101.39
3/3/2015	53.65	62.64	62.17	77.51	63.31	32.42	63.56	45.15	44.26	73.90	50.67	101.94
3/2/2015	53.40	62.41	61.82	77.06	63.29	31.80	62.86	44.87	43.99	73.49	50.11	101.54
2/27/2015	54.84	63.60	63.14	78.55	63.82	32.51	64.08	45.79	44.65	74.73	50.98	103.46
2/26/2015	54.73	63.71	63.06	78.56	63.67	32.73	64.40	45.76	44.63	74.59	50.79	103.48
2/25/2015	54.95	64.37	63.79	79.01	64.46	33.81	64.82	45.92	44.81	75.56	51.57	103.78
2/24/2015	56.10	65.51	65.26	79.85	65.20	34.08	66.06	46.89	45.54	77.10	52.56	105.31
2/23/2015	55.89	65.09	64.27	79.26	65.03	33.86	66.03	46.47	45.13	77.10	52.54	105.22
2/20/2015	55.24	64.61	63.75	78.71	63.66	34.05	65.77	46.14	44.75	76.51	51.93	104.83
2/19/2015	55.20	64.55	64.80	79.17	63.96	33.92	65.83	46.19	44.76	76.04	51.47	104.66
2/18/2015	54.53	65.04	65.41	80.97	64.89	33.89	66.67	46.84	45.68	76.74	52.21	105.72
2/17/2015	52.78	63.42	63.82	79.39	62.99	33.33	64.97	45.54	44.43	75.17	51.01	102.67
2/13/2015	53.65	63.57	63.92	79.84	62.49	33.34	65.13	45.88	44.75	74.90	50.96	102.87
2/12/2015	54.82	64.46	64.96	81.06	64.37	33.75	66.94	46.56	45.34	76.50	52.27	104.58
2/11/2015	54.31	64.66	65.29	81.85	64.24	33.25	67.02	47.43	45.16	75.99	51.76	104.30
2/10/2015	54.82	66.08	66.34	83.38	65.56	33.78	67.60	48.15	46.06	78.11	53.37	107.05
2/9/2015	54.08	64.64	65.39	81.92	63.68	33.34	66.50	47.27	45.45	76.65	52.20	103.76
2/6/2015	54.84	65.78	66.11	82.33	63.94	33.64	66.79	47.64	46.01	77.53	53.01	105.03
2/5/2015	56.95	68.81	68.13	85.90	67.28	35.07	69.82	49.17	48.07	80.61	55.58	108.91
2/4/2015	56.42	68.11	67.55	85.17	67.05	34.92	69.80	48.92	47.57	79.84	54.88	108.65
2/3/2015	57.07	69.11	68.31	85.96	67.46	35.55	70.46	50.24	48.29	80.56	55.52	109.44
2/2/2015	56.56	68.93	68.77	86.18	67.83	35.43	70.25	50.22	48.02	80.81	55.78	109.27

# Exhibit No. PA-308, Page 3 of 9

### Stock Price Data in Date Order for Yield Calculation/Raw Price Data

1/30/2015	56.13	68.61	68.59	86.32	67.69	35.18	70.18	50.16	47.53	80.39	55.33	108.45
1/29/2015	57.83	70.32	70.69	88.52	68.59	35.97	71.44	52.21	48.63	82.40	57.02	110.85
1/28/2015	57.81	69.20	70.15	87.02	67.17	35.85	70.72	51.60	47.70	81.55	56.34	109.12
1/27/2015	58.65	69.47	70.18	87.88	67.91	36.20	71.49	51.85	48.38	81.85	56.64	110.41
1/26/2015	58.25	69.62	69.71	87.71	67.88	35.86	71.61	51.66	48.62	81.84	56.57	108.95
1/23/2015	57.70	69.65	69.67	87.88	67.93	35.70	71.66	51.66	48.61	81.61	56.50	108.69
1/22/2015	57.49	69.50	69.36	87.79	67.72	35.69	71.87	51.56	48.55	81.15	56.17	108.75
1/21/2015	56.91	69.52	69.75	87.84	68.00	35.48	71.86	51.44	48.64	81.26	56.01	109.09
1/20/2015	56.83	69.02	69.30	86.86	67.71	35.10	71.36	51.09	48.47	80.38	55.32	108.14
1/16/2015	56.89	69.05	68.42	86.53	67.54	35.03	70.82	50.79	48.91	79.89	55.42	107.43
1/15/2015	56.19	67.78	67.69	85.94	67.40	34.40	70.01	50.24	48.08	78.87	54.62	106.26
1/14/2015	56.31	67.62	66.82	84.88	67.07	33.97	69.39	49.64	47.88	78.33	53.93	106.67
1/13/2015	55.46	66.40	66.11	84.66	66.05	33.89	68.65	49.14	46.96	77.05	53.30	106.01
1/12/2015	54.75	65.95	66.24	84.21	66.43	34.01	68.50	49.17	46.71	76.82	53.04	105.60
1/9/2015	55.10	66.13	66.46	84.13	66.93	34.43	68.51	49.16	46.91	77.35	53.20	105.87
1/8/2015	56.09	67.08	66.81	84.01	66.62	35.40	69.54	49.79	47.09	78.03	53.50	106.81
1/7/2015	55.01	66.04	66.40	83.67	66.25	34.95	69.42	49.75	46.17	77.65	52.91	106.16
1/6/2015	53.99	64.97	65.43	83.40	65.16	34.46	67.84	49.21	45.12	76.66	52.27	105.20
1/5/2015	54.04	65.17	65.06	82.06	64.91	34.95	67.61	48.62	45.15	76.42	52.13	104.79
1/2/2015	54.91	65.98	65.68	83.26	65.07	35.37	68.07	48.83	45.84	77.48	52.77	105.92
12/31/2014	54.64	65.90	65.36	82.75	65.04	35.22	67.74	48.57	45.85	77.17	52.33	105.52
12/30/2014	55.85	67.18	66.25	83.90	66.48	35.57	68.82	49.23	46.73	78.49	53.29	107.05
12/29/2014	57.42	68.78	67.82	86.01	67.81	36.41	70.04	50.32	47.73	79.92	54.80	109.70
12/26/2014	55.99	67.61	67.09	85.00	66.67	35.62	69.43	49.92	46.12	79.13	54.12	108.50
12/24/2014	55.30	66.88	66.25	84.17	65.89	35.19	69.01	49.36	45.59	77.62	53.14	107.20
12/23/2014	54.70	65.79	65.36	82.89	64.50	34.81	67.61	48.63	44.39	76.12	52.07	105.55
12/22/2014	54.72	65.58	65.29	82.82	64.40	34.74	67.42	48.82	44.21	76.53	51.88	105.17
12/19/2014	54.46	64.96	65.04	82.07	63.97	34.56	66.83	48.48	44.18	75.91	51.91	105.10
12/18/2014	54.06	64.94	64.91	82.23	63.95	34.77	66.73	48.46	44.83	76.01	51.56	104.68
12/17/2014	53.06	63.66	64.14	80.60	63.07	34.09	65.44	47.77	43.78	75.02	50.79	102.37
12/16/2014	51.61	62.27	63.50	79.86	62.37	33.15	63.92	47.24	43.06	74.26	49.85	100.35
12/15/2014	51.49	62.17	63.42	80.37	62.40	32.98	64.00	47.33	43.13	73.69	49.75	99.93
12/12/2014	51.64	62.90	63.47	81.91	63.18	34.07	64.95	47.40	43.64	73.61	49.98	100.08
12/11/2014	52.07	63.80	63.79	82.11	63.60	34.59	65.32	47.87	44.52	75.18	50.84	101.74
12/10/2014	51.80	63.26	62.79	81.47	63.41	34.57	64.73	47.40	44.04	74.92	50.52	100.70
12/9/2014	52.73	64.12	63.42	81.40	63.92	35.56	65.44	47.61	45.09	75.37	50.55	103.83
12/8/2014	52.00	63.97	63.28	80.86	63.80	35.32	65.67	47.52	44.63	74.89	50.47	102.92
12/5/2014	51.72	63.25	62.63	79.97	62.81	35.27	65.35	47.02	44.58	74.22	49.75	102.18
12/4/2014	51.84	63.73	63.44	81.57	63.58	35.16	65.31	47.39	44.80	74.48	49.91	102.74
12/3/2014	51.71	63.47	63.30	81.20	63.39	35.35	64.78	47.38	44.53	73.59	49.54	103.63
12/2/2014	51.31	63.23	63.54	81.56	63.44	35.36	64.30	47.39	44.46	73.36	49.45	104.35
12/1/2014	50.47				62.78	34.88	63.07	47.17	43.88	72.93	49.29	104.05

Exhibit No. 308, Page 4 of 9

# 6 month Stock Prices Reordered Low to High 12/1/2014 to 5/31/2015

										Elim M	erger/Ac	ιu.
Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
5/29/2015	48.06	59.47	59.60	74.44	58.84	31.21	58.60	42.84	41.04	69.93	46.84	99.15
5/28/2015	48.32	59.90	60.18	75.46	59.52	31.23	59.38	42.93	41.38	70.66	47.23	99.25
5/27/2015	48.33	60.09	60.43	75.49	59.60	31.24	59.40	43.04	41.65	70.66	47.31	99.27
5/26/2015	48.36	60.19	60.45	75.51	59.75	31.45	59.48	43.18	41.69	70.81	47.38	99.39
5/22/2015	48.36	60.26	60.45	75.61	60.14	31.50	59.53	43.23	41.87	70.94	47.47	99.44
5/21/2015	48.43	60.27	60.48	75.73	60.27	31.53	59.62	43.30	41.91	71.23	47.55	99.83
5/20/2015	48.60	60.29	60.59	75.76	60.37	31.60	59.74	43.38	41.95	71.26	47.55	100.26
5/19/2015	48.65	60.44	60.82	75.77	60.44	31.72	59.86	43.51	41.97	71.41	47.67	100.31
5/18/2015	48.74	60.68	60.86	75.95	60.46	31.72	59.96	43.53	42.00	71.56	48.00	100.44
5/15/2015	48.96	61.00	61.01	76.01	60.58	31.81	60.48	43.60	42.26	71.85	48.23	100.83
5/14/2015	49.02	61.01	61.05	76.03	60.67	31.82	60.56	43.65	42.36	71.91	48.24	101.10
5/13/2015	49.08	61.21	61.07	76.05	60.74	31.83	60.57	43.67	42.42	71.94	48.26	101.36
5/12/2015	49.25	61.23	61.14	76.15	60.77	31.96	60.78	43.67	42.55	71.99	48.28	101.38
5/11/2015	49.42	61.26	61.14	76.16	60.78	31.96	60.92	43.68	42.55	72.25	48.30	101.45
5/8/2015	49.59	61.26	61.34	76.19	60.81	31.99	60.96	43.69	42.57	72.46	48.33	101.52
5/7/2015	49.59	61.30	61.37	76.21	60.81	32.00	60.98	43.72	42.57	72.55	48.34	101.73
5/6/2015	49.64	61.33	61.38	76.31	60.83	32.01	61.08	43.72	42.77	72.83	48.70	101.74
5/5/2015	49.85	61.40	61.44	76.54	61.05	32.04	61.09	43.73	42.85	72.94	48.73	101.98
5/4/2015	50.13	61.46	61.81	77.09	61.54	32.37	61.15	44.26	42.86	72.96	49.16	102.27
5/1/2015	50.35	61.87	61.84	77.15	61.92	32.60	61.18	44.42	43.16	73.33	49.41	102.34
High	50.35	61.87	61.84	77.15	61.92	32.60	61.18	44.42	43.16	73.33	49.41	102.34
Low	48.06	59.47	59.60	74.44	58.84	31.21	58.60	42.84	41.04	69.93	46.84	99.15
Average												
H_L	49.21	60.67	60.72	75.79	60.38	31.91	59.89	43.63	42.10	71.63	48.12	100.74
Div	2.02	2.20	2.60	3.18	1.67	1.00	2.38	2.17	1.52			
Yield	4.11	3.63	4.28	4.20	2.77	3.13	3.97	4.97	3.61			

Exhibit No. 308, Page 5 of 9

## 6 month Stock Prices Reordered Low to High 12/1/2014 to 5/312015

Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
4/30/2015	50.30	61.60	60.26	76.83	60.01	31.58	61.20	44.11	43.17	71.68	49.05	100.93
4/29/2015	50.65	61.82	60.46	76.97	60.44	31.62	62.02	44.11	43.50	72.07	49.12	102.70
4/28/2015	50.87	62.26	60.59	77.01	60.50	31.62	62.06	44.20	43.63	72.26	49.36	103.15
4/27/2015	50.94	62.19	60.60	77.23	60.94	31.66	62.09	44.20	43.70	72.26	49.43	103.29
4/24/2015	51.08	62.05	60.76	77.30	61.01	31.76	62.12	44.26	43.83	72.28	49.45	103.40
4/23/2015	51.15	60.47	60.82	77.31	61.07	31.95	62.22	44.30	43.84	72.37	49.54	103.75
4/22/2015	51.15	61.76	60.86	77.31	61.58	32.06	62.30	44.32	43.84	72.44	49.54	103.76
4/21/2015	51.27	61.97	60.91	77.57	61.65	32.07	62.31	44.34	43.94	72.57	49.65	103.82
4/20/2015	51.38	62.45	60.94	77.59	61.66	32.09	62.38	44.35	43.94	72.66	49.70	104.01
4/17/2015	51.44	62.05	60.95	77.65	61.68	32.21	62.44	44.42	43.99	72.67	49.78	104.04
4/16/2015	51.49	61.96	61.15	77.84	62.01	32.21	62.52	44.47	44.04	72.71	49.79	104.10
4/15/2015	51.54	62.20	61.47	78.02	62.49	32.32	62.60	44.48	44.05	73.03	49.90	104.18
4/14/2015	51.57	62.58	61.55	78.07	62.81	32.41	62.74	44.62	44.15	73.05	49.93	104.28
4/13/2015	51.59	62.30	61.55	78.24	62.93	32.42	62.80	44.62	44.23	73.10	50.17	104.29
4/10/2015	51.66	62.35	61.64	78.30	62.99	32.43	62.82	44.64	44.30	73.23	50.21	104.36
4/9/2015	51.83	61.76	61.69	78.37	63.04	32.45	62.85	44.65	44.32	73.44	50.23	104.50
4/8/2015	51.86	62.22	61.80	78.43	63.37	32.48	63.06	44.66	44.35	73.59	50.28	104.75
4/7/2015	51.86	62.32	62.08	78.61	63.71	32.67	63.15	44.69	44.48	73.82	50.33	104.76
4/6/2015	52.36	62.52	62.10	78.86	63.73	32.68	63.18	44.76	44.59	73.83	50.34	105.05
4/2/2015	52.68	62.77	62.27	78.97	63.79	32.81	63.43	44.87	44.89	74.14	50.66	105.54
4/1/2015	52.79	63.09	62.50	79.41	64.24	32.86	63.81	44.92	44.94	74.45	51.11	104.90
High	52.79	63.09	62.50	79.41	64.24	32.86	63.81	44.92	44.94	74.45	51.11	104.90
Low	50.30	61.60	60.26	76.83	60.01	31.58	61.20	44.11	43.17	71.68	49.05	100.93
Average	51.55	60.04	<i>c</i> 1 20	70.10	60.10	22.22	<i>c</i> 2.50	44.50	1106	72.07	<b>7</b> 0.00	102.02
H_L	51.55	62.34	61.38	78.12	62.13	32.22	62.50	44.52	44.06	73.07	50.08	102.92
Div	2.02	2.20	2.60	3.18	1.67	1.00	2.38	2.10	1.52			
Yield	3.92	3.53	4.24	4.07	2.69	3.10	3.81	4.72	3.45			

Exhibit No. 308, Page 6 of 9

### 6 month Stock Prices Reordered Low to High 12/1/2014 to 5/31/2015

Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
3/31/2015	51.64	60.25	58.80	74.28	60.91	31.19	61.80	43.72	42.67	70.58	47.82	97.98
3/30/2015	51.90	60.31	59.72	74.35	61.38	31.24	61.97	43.76	42.70	71.23	48.21	97.99
3/27/2015	52.12	60.52	59.80	74.61	61.58	31.31	62.08	43.93	42.71	71.29	48.35	98.70
3/26/2015	52.14	60.67	59.98	74.70	61.65	31.38	62.10	43.95	42.79	71.30	48.40	98.93
3/25/2015	52.19	60.70	60.08	74.76	61.81	31.43	62.26	44.01	42.91	71.53	48.56	100.52
3/24/2015	52.40	61.15	60.42	74.96	62.16	31.49	62.56	44.01	43.06	71.57	48.62	100.61
3/23/2015	52.59	61.30	60.58	74.96	62.18	31.50	62.86	44.03	43.38	71.83	48.70	101.39
3/20/2015	52.67	61.64	60.79	75.00	62.41	31.50	63.00	44.09	43.41	71.95	48.87	101.54
3/19/2015	52.76	61.69	60.84	75.08	62.47	31.52	63.05	44.28	43.49	72.02	49.06	101.94
3/18/2015	52.76	61.79	60.84	75.28	62.63	31.61	63.05	44.32	43.76	72.04	49.09	102.13
3/17/2015	52.80	62.02	60.88	75.71	62.71	31.66	63.07	44.33	43.88	72.10	49.45	102.72
3/16/2015	52.96	62.09	61.00	75.90	63.02	31.67	63.25	44.46	43.96	72.13	49.50	102.97
3/13/2015	53.02	62.20	61.17	76.01	63.04	31.72	63.33	44.52	43.99	72.46	49.62	103.28
3/12/2015	53.02	62.41	61.40	76.06	63.09	31.76	63.53	44.63	44.00	72.55	49.63	103.42
3/11/2015	53.14	62.54	61.47	76.40	63.29	31.80	63.56	44.66	44.11	73.02	49.73	103.54
3/10/2015	53.23	62.58	61.53	76.67	63.31	31.85	63.75	44.83	44.14	73.43	49.92	104.05
3/9/2015	53.39	62.64	61.72	76.78	63.39	31.91	63.80	44.87	44.21	73.49	49.94	104.74
3/6/2015	53.40	62.72	61.82	76.80	63.73	32.22	63.90	44.97	44.26	73.67	50.11	104.84
3/5/2015	53.47	63.00	61.87	77.06	63.74	32.29	63.99	45.02	44.36	73.73	50.17	105.48
3/4/2015	53.61	63.02	62.09	77.08	63.79	32.29	64.73	45.14	44.60	73.90	50.19	105.74
3/3/2015	53.65	63.43	62.17	77.51	64.38	32.42	64.82	45.15	44.62	74.01	50.48	105.99
3/2/2015	53.90	63.58	62.32	77.58	65.05	32.45	64.87	45.17	44.77	74.33	50.67	106.90
High	53.90	63.58	62.32	77.58	65.05	32.45	64.87	45.17	44.77	74.33	50.67	106.90
Low	51.64	60.25	58.80	74.28	60.91	31.19	61.80	43.72	42.67	70.58	47.82	97.98
Avg H-L	52.77	61.92	60.56	75.93	62.98	31.82	63.34	44.45	43.72	72.46	49.25	102.44
Div	2.02	2.20	2.60	3.18	1.67	1.00	2.38	2.10	1.52			
Yield	3.83	3.55	4.29	4.19	2.65	3.14	3.76	4.72	3.48			

Exhibit No. 308, Page 7 of 9

# 6 month Stock Prices Reordered Low to High 12/1/2014 to 5/31/2015

Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
2/27/2015	52.78	63.42	63.06	78.55	62.49	32.51	64.08	45.54	44.43	74.59	50.79	102.67
2/26/2015	53.65	63.57	63.14	78.56	62.99	32.73	64.40	45.76	44.63	74.73	50.96	102.87
2/25/2015	54.08	63.60	63.75	78.71	63.66	33.25	64.82	45.79	44.65	74.90	50.98	103.46
2/24/2015	54.31	63.71	63.79	79.01	63.67	33.33	64.97	45.88	44.75	75.17	51.01	103.48
2/23/2015	54.53	64.37	63.82	79.17	63.68	33.34	65.13	45.92	44.75	75.56	51.47	103.76
2/20/2015	54.73	64.46	63.92	79.26	63.82	33.34	65.77	46.14	44.76	75.99	51.57	103.78
2/19/2015	54.82	64.55	64.27	79.39	63.94	33.64	65.83	46.19	44.81	76.04	51.76	104.30
2/18/2015	54.82	64.61	64.80	79.84	63.96	33.75	66.03	46.47	45.13	76.50	51.93	104.58
2/17/2015	54.84	64.64	64.96	79.85	64.24	33.78	66.06	46.56	45.16	76.51	52.20	104.66
2/13/2015	54.84	64.66	65.26	80.97	64.37	33.81	66.50	46.84	45.34	76.65	52.21	104.83
2/12/2015	54.95	65.04	65.29	81.06	64.46	33.86	66.67	46.89	45.45	76.74	52.27	105.03
2/11/2015	55.20	65.09	65.39	81.85	64.89	33.89	66.79	47.27	45.54	77.10	52.54	105.22
2/10/2015	55.24	65.51	65.41	81.92	65.03	33.92	66.94	47.43	45.68	77.10	52.56	105.31
2/9/2015	55.89	65.78	66.11	82.33	65.20	34.05	67.02	47.64	46.01	77.53	53.01	105.72
2/6/2015	56.10	66.08	66.34	83.38	65.56	34.08	67.60	48.15	46.06	78.11	53.37	107.05
2/5/2015	56.42	68.11	67.55	85.17	67.05	34.92	69.80	48.92	47.57	79.84	54.88	108.65
2/4/2015	56.56	68.81	68.13	85.90	67.28	35.07	69.82	49.17	48.02	80.56	55.52	108.91
2/3/2015	56.95	68.93	68.31	85.96	67.46	35.43	70.25	50.22	48.07	80.61	55.58	109.27
2/2/2015	57.07	69.11	68.77	86.18	67.83	35.55	70.46	50.24	48.29	80.81	55.78	109.44
High	57.07	69.11	68.77	86.18	67.83	35.55	70.46	50.24	48.29	80.81	55.78	109.44
Low	52.78	63.42	63.06	78.55	62.49	32.51	64.08	45.54	44.43	74.59	50.79	102.67
Avg H-L	54.93	66.27	65.92	82.37	65.16	34.03	67.27	47.89	46.36	77.70	53.29	106.06
Div	2.02	2.20	2.60	3.18	1.67	1.00	2.38	2.10	1.52			
Yield	3.68	3.32	3.94	3.86	2.56	2.94	3.54	4.39	3.28			

## Exhibit No. 308, Page 8 of 9

# 6 month Prices Reordered Low to High 12/1/2014 to 5/31/2015

Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
1/30/2015	53.99	64.97	65.06	82.06	64.91	33.89	67.61	48.62	45.12	76.42	52.13	104.79
1/29/2015	54.04	65.17	65.43	83.26	65.07	33.97	67.84	48.83	45.15	76.66	52.27	105.20
1/28/2015	54.75	65.95	65.68	83.40	65.16	34.01	68.07	49.14	45.84	76.82	52.77	105.60
1/27/2015	55.01	65.98	66.11	83.67	66.05	34.40	68.50	49.16	46.17	77.05	52.91	105.87
1/26/2015	55.10	66.04	66.24	84.01	66.25	34.43	68.51	49.17	46.71	77.35	53.04	105.92
1/23/2015	55.46	66.13	66.40	84.13	66.43	34.46	68.65	49.21	46.91	77.48	53.20	106.01
1/22/2015	56.09	66.40	66.46	84.21	66.62	34.95	69.39	49.64	46.96	77.65	53.30	106.16
1/21/2015	56.13	67.08	66.81	84.66	66.93	34.95	69.42	49.75	47.09	78.03	53.50	106.26
1/20/2015	56.19	67.62	66.82	84.88	67.07	35.03	69.54	49.79	47.53	78.33	53.93	106.67
1/16/2015	56.31	67.78	67.69	85.94	67.17	35.10	70.01	50.16	47.70	78.87	54.62	106.81
1/15/2015	56.83	68.61	68.42	86.32	67.40	35.18	70.18	50.24	47.88	79.89	55.32	107.43
1/14/2015	56.89	69.02	68.59	86.53	67.54	35.37	70.72	50.79	48.08	80.38	55.33	108.14
1/13/2015	56.91	69.05	69.30	86.86	67.69	35.40	70.82	51.09	48.38	80.39	55.42	108.45
1/12/2015	57.49	69.20	69.36	87.02	67.71	35.48	71.36	51.44	48.47	81.15	56.01	108.69
1/9/2015	57.70	69.47	69.67	87.71	67.72	35.69	71.44	51.56	48.55	81.26	56.17	108.75
1/8/2015	57.81	69.50	69.71	87.79	67.88	35.70	71.49	51.60	48.61	81.55	56.34	108.95
1/7/2015	57.83	69.52	69.75	87.84	67.91	35.85	71.61	51.66	48.62	81.61	56.50	109.09
1/6/2015	58.25	69.62	70.15	87.88	67.93	35.86	71.66	51.66	48.63	81.84	56.57	109.12
1/5/2015	58.65	69.65	70.18	87.88	68.00	35.97	71.86	51.85	48.64	81.85	56.64	110.41
1/2/2015	54.91	70.32	70.69	88.52	68.59	36.20	71.87	52.21	48.91	82.40	57.02	110.85
High	54.91	70.32	70.69	88.52	68.59	36.20	71.87	52.21	48.91	82.40	57.02	110.85
Low	53.99	64.97	65.06	82.06	64.91	33.89	67.61	48.62	45.12	76.42	52.13	104.79
Avg H-L	54.45	67.65	67.88	85.29	66.75	35.05	69.74	50.42	47.02	79.41	54.58	107.82
Div	1.96	2.05	2.52	3.18	1.67	1.00	2.38	2.10	1.52			
Yield	3.60	3.03	3.71	3.73	2.50	2.85	3.41	4.17	3.23			

Exhibit No. 308, Page 9 of 9

6 month Stock Prices Reord	lered Low to high 12/1/2014	to 5/31/2015 w/Avg Yield

o monui si	OCK I I		corder		_						5 1 1010	
Date	ALE	LNT	ED	DUK	EIX	OGE	PNW	SO	VVC	TEG	WEC	NEE
12/31/2014	50.47	62.17	62.63	79.86	62.37	32.98	63.07	47.02	43.06	72.93	49.29	99.93
12/30/2014	51.31	62.27	62.79	79.97	62.40	33.15	63.92	47.17	43.13	73.36	49.45	100.08
12/29/2014	51.49	62.90	63.20	80.37	62.78	34.07	64.00	47.24	43.64	73.59	49.54	100.35
12/26/2014	51.61	62.95	63.28	80.60	62.81	34.09	64.30	47.33	43.78	73.61	49.75	100.70
12/24/2014	51.64	63.23	63.30	80.86	63.07	34.56	64.73	47.38	43.88	73.69	49.75	101.74
12/23/2014	51.71	63.25	63.42	81.20	63.18	34.57	64.78	47.39	44.04	74.22	49.85	102.18
12/22/2014	51.72	63.26	63.42	81.23	63.39	34.59	64.95	47.39	44.18	74.26	49.91	102.37
12/19/2014	51.80	63.47	63.44	81.40	63.41	34.74	65.31	47.40	44.21	74.48	49.98	102.74
12/18/2014	51.84	63.66	63.47	81.47	63.44	34.77	65.32	47.40	44.39	74.89	50.47	102.92
12/17/2014	52.00	63.73	63.50	81.56	63.58	34.81	65.35	47.52	44.46	74.92	50.52	103.63
12/16/2014	52.07	63.80	63.54	81.57	63.60	34.88	65.44	47.61	44.52	75.02	50.55	103.83
12/15/2014	52.73	63.97	63.79	81.91	63.80	35.16	65.44	47.77	44.53	75.18	50.79	104.05
12/12/2014	53.06	64.12	64.14	82.07	63.92	35.19	65.67	47.87	44.58	75.37	50.84	104.35
12/11/2014	54.06	64.94	64.91	82.11	63.95	35.22	66.73	48.46	44.63	75.91	51.56	104.68
12/10/2014	54.46	64.96	65.04	82.23	63.97	35.27	66.83	48.48	44.80	76.01	51.88	105.10
12/9/2014	54.64	65.58	65.29	82.75	64.40	35.32	67.42	48.57	44.83	76.12	51.91	105.17
12/8/2014	54.70	65.79	65.36	82.82	64.50	35.35	67.61	48.63	45.09	76.53	52.07	105.52
12/5/2014	54.72	65.90	65.36	82.89	65.04	35.36	67.74	48.82	45.59	77.17	52.33	105.55
12/4/2014	55.30	66.88	66.25	83.90	65.89	35.56	68.82	49.23	45.85	77.62	53.14	107.05
12/3/2014	55.85	67.18	66.25	84.17	66.48	35.57	69.01	49.36	46.12	78.49	53.29	107.20
12/2/2014	55.99	67.61	67.09	85.00	66.67	35.62	69.43	49.92	46.73	79.13	54.12	108.50
12/1/2014	57.42	68.78	67.82	86.01	67.81	36.41	70.04	50.32	47.73	79.92	54.80	109.70
High	57.42	68.78	67.82	86.01	67.81	36.41	70.04	50.32	47.73	79.92	54.80	109.70
Low	50.47	62.17	62.63	79.86	62.37	32.98	63.07	47.02	43.06	72.93	49.29	99.93
Avg H-L	53.95	65.48	65.23	82.94	65.09	34.70	66.56	48.67	45.40	76.43	52.05	104.82
Div	1.96	2.05	2.52	3.18	1.67	1.00	2.38	2.10	1.52			
Yield	3.63	3.13	3.86	3.83	2.57	2.88	3.58	4.31	3.35			
Average 6 month												
yield	3.79	3.36	4.06	3.98	2.62	3.01	3.68	4.55	3.40			
~		_	_	_			_		_			