



Oregon

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June 15, 2015

Via Electronic Filing and US Mail

OREGON PUBLIC UTILITY COMMISSION
ATTENTION: FILING CENTER
PO BOX 1088
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**RE: Docket No. UE 294 – In the Matter of
PORTLAND GENERAL ELECTRIC COMPANY,
Request for a General Rate Revision.**

Enclosed for filing is Public Utility Commission Staff Opening Testimony.

Exhibits 207, 402, 403 and 404 are confidential and will be mailed separately to parties who have signed Protective Order No. 15-036.

A copy of UE 294 Service List and Certificate of Service are included with this filing.

/s/ Kay Barnes
Filing on Behalf of Public Utility Commission Staff
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CASE: UE 294
WITNESS: MATT MULDOON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 200

Opening Testimony

June 15, 2015

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Matt Muldoon. I am a Senior Economist for the Public Utility
3 Commission of Oregon (Commission or OPUC). My business address is:
4 3930 Fairview Industrial Dr. SE, Salem, OR 97302-1166.

5 **Q. Please describe your educational background and work experience.**

6 A. My Witness Qualification Statement can be found in Exhibit Staff/201.

7 **Q. What is the purpose of your testimony?**

8 A. I am responsible for four issues generally regarding Cost of Capital (CoC) in
9 this docket:

- 10 1. Capital Structure,
- 11 2. Cost of Common Equity, also known as Return on Equity (ROE),
- 12 3. Cost of Long-Term (LT) Debt, and
- 13 4. Allowance for Funds Used During Construction (AFUDC).

14 **Q. What is your summary recommendation regarding ROE?**

15 A. I recommend PGE's ROE be reduced from the 9.68 percent set in PGE's
16 previous rate case to 9.16 percent.

17 **ISSUE 1 – CAPITAL STRUCTURE**

18 **Q. What is the basis for your recommendation for 50 percent debt/equity,**
19 **capital structure?**

20 A. I have four reasons for supporting this capital structure:

- 21 1. PGE has consistently presented this target capital structure to investors,
22 to the Security and Exchange Commission (SEC) and to rating agencies

- 1 since PGE refloated its current series of common stock after the demise
2 of Enron;
- 3 2. PGE can achieve this 50/50 target through current proposed and
4 Commission authorized issuances of LT debt and its equity forward;
- 5 3. This target is within the range of capital structures that optimizes the
6 Company's financial performance as balanced against the risk of
7 leverage; and
- 8 4. This is the same capital structure adopted for the last several rate cases
9 by the Commission for PGE.

ISSUE 2 – COST OF COMMON EQUITY (ROE)

11 **Q. PGE is requesting an ROE of 9.9 percent. This recommendation is**
12 **based in part on the Company's ROE witness Dr. Bente Villadsen of**
13 **The Brattle Group's multistage discounted cash flow models**
14 **estimating a 9.8 and 9.10 percent ROE. What are the bases for the**
15 **difference between the Company's requested ROE and your**
16 **recommended 9.16 percent ROE beyond GDP Growth differences?**

17 A. There are several reasons, but primarily because the Company:

- 18 ☼ Uses 20-year US Treasury (UST) bond values as a benchmark for
19 spreads. Academic and market analysis typically uses 10-year and 30-
20 year values. Use of the 20-year data inflates textbook understandings
21 and actual market costs.



- 22
23
24
25 ☼ Shortens declining future data series. PGE selects higher values by
26 using data from five years instead of 30 years into the future for long-
27 term third stage growth rate of discounted cash flow (DCF) modeling.

1 PGE also shortens the estimate window, which conflates medium
2 immediate-term Blue Chip values to the higher five year values.

3 ☼ Emphasizes historical methods with tails back to higher inputs.
4 For example: A spread of bonds over risk free rates extrapolating five
5 years of data forward would no longer reach back to the market
6 disruption of 2008. Current and common practice is to use a five-year
7 spread, which now phases out the 2008 downturn. In Exhibit PGE/1100,
8 Villadsen/42, PGE uses a three pronged approach that inflates results.
9 First PGE uses a 6.37 percent risk premium, relying on a 20-year UST
10 bond rate. Second, PGE uses UST projections leaning into 2017, which
11 maximize the time value of uncertainty in market forwards. Relying on
12 the 1997 to 2014 period rather than a typical five-year history as shown
13 in Value Line (VL), lets PGE continue to incorporate the 2008 to 2010
14 and world trade center disruptions. The result is a 10.7 percent cost of
15 equity estimate rather than about a 9.2 percent.

16 ☼ Overstates required Hamada adjustments. PGE uses 10 years of
17 historical book capital structure that enlarges the effect of the Hamada
18 adjustment for disparate leverage. Corrected to typical market use,
19 PGE's peer group on average merits no adjustment. PGE here also
20 reaches back in time avoiding forward looking information even though it
21 is available via VL.

22 ☼ Relies on positive near term projections that were not realized.
23 For example, a year ago many experts expected Q1 2015 GDP to be
24 more positive. Now that we are here, it looks like another
25 disappointment.¹ This is not a technical error on PGE's part. Rather
26 Staff has the advantage of later opening testimony when more current
27 information was available.

28 ☼ Uses a less closely screened cohort of peer utilities including companies
29 that the Edison Electric Institute (EEI) determines are 50 percent to 79
30 percent regulated on top of Staff's 80 percent regulated assets cutoff.²

31 ☼ In Exhibit PGE/1103, Villadsen/2 PGE explains two methods that
32 increase required returns. First, instead of performing CAPM
33 calculations using 10- or 30-year UST as the current forward looking risk
34 free benchmark, PGE shifts upward its UST risk free value already
35 inflated as the 20-year rate, a rate seldom actually used by academics or
36 market analysts because it is a poor value and thinly traded –
37 unrepresentative. Then PGE adds the difference between 20 year and
38 10 year current relatively high spread peculiarly and uniquely on top of

¹ See the article, "Recovery Stumbles Yet Again" by Josh Mitchell in the May 30, 2015, print edition of the Wall Street Journal (WSJ).

² See UE 294/PGE/1100, Villadsen/33, at lines 4-5.

1 the 20 year values. This unusual manipulation increases outcomes by 1
2 percent, before other adjustments.

3 ☼ PGE relies on higher than reasonable Market Risk Premiums (MRP).
4 PGE creates its own estimated risk-free rate, avoiding historically low
5 risk free rates seen now. Dr. Villadsen states that she cannot believe
6 that today's MRP could be less than the historical MRP.

7 ☼ PGE reverses UST yield trends and fails to address \$1 trillion Euro
8 quantitative easing. In a time when German five-year bonds have had a
9 negative return, PGE says that investors are more risk averse but fails to
10 point out that the relative safe and more attractive investments are
11 PGE's dividend-bearing stock and bonds.³

12 ☼ The next method that boosts outcomes is the use of Dr. Roger Morin's
13 "Empirical CAPM" or (ECAPM). Were no mathematical steroids used in
14 the basic CAPM model, CAPM would return a lower required ROE than
15 Staff recommends. ECAPM (a method not commonly used by finance
16 academics and professionals) presumes that the security market line
17 could be pivoted at a designated point until a reasonable result is
18 obtained. The argument is that a properly pivoted CAPM model will
19 correct for CAPM's flaws. Essentially this is a method that augments
20 CAPM ROE by a minimum of 50 bps.

21 ☼ Injects after-tax calculations in comparison with pretax constructs.

22 **Q. How is your testimony organized?**

23 A. My testimony is organized as follows:

24	Issue 1 – Capital Structure	1
25	Issue 2 – Cost of Common Equity (ROE)	2
26	What is New in this rate case?	6
27	Overview of ROE Positions	11
28	Peer Screen	17
29	Sensitivity Analysis	18
30	Growth Rates	19
31	Alternative Models Examined	29
32	Single-Stage Gordon Growth DCF Modeling	29
33	Risk Premium Modeling	31

³ See "Why Dividend-Paying Stocks Are a Retiree's Best Friend" by Jonathan Clements in the May 30, 2015, print edition of the WSJ. Therein, Mr. Clements points out that with bond yields so low, wise investors are replacing some bond holdings with a diverse portfolio of reliable dividend paying stocks with an aggregate dividend yield of about three percent.

1	Rebuttal of PGE’s CAPM Modeling	36
2	PGE’s Comparative Riskiness	42
3	Equity Forward	45
4	Adjustment of Modeling Results	46
5	Hamada Equation	48
6	Informed Staff Analysis	49
7	Updates to PGE Models	54
8	Issue 3 – COST OF LT DEBT	55
9	Issue 4 – AFUDC	57
10	CONCLUSION	58

11 **Q. Did you prepare exhibits in support of your opening testimony?**

12 A. Yes. I prepared the following exhibits:

- 13 Staff/202 Staff Peer Screening
- 14 Staff/203 Staff Three Stage DCF Modeling
- 15 Staff/204 Staff Synthetic Forward Curve TIPS Analysis
- 16 Staff/205 Staff Historical GDP Analysis with BEA Data
- 17 Staff/206 Representative GPD Growth Projections
- 18 Staff/207 **CONFIDENTIAL** – Cost of LT Debt Table
- 19 Staff/208 PGE Depiction of Rate Base Expansion to Investors
- 20 Staff/209 Value Line (VL) Electric Utility Profiles
- 21 Staff/210 Moody’s Sector In-Depth – US Regulated Utilities
- 22 Staff/211 Frequency of Peer General Rate Case Filings

23 **Q. Does Staff’s recommended ROE meet appropriate standards?**

24 A. Yes. Assuming the other cost elements of the rate case are also well
 25 founded, the 9.16 percent ROE I recommend meets the *Hope* and *Bluefield*

1 standards, as well as the requirements of Oregon Revised Statute
2 (ORS) 756.040. My recommendations are consistent with establishing “fair
3 and reasonable rates” that are both “commensurate with the return on
4 investments in other enterprises having corresponding risks” and “sufficient to
5 ensure confidence in the financial integrity of the utility, allowing the utility to
6 maintain its credit and attract capital.”⁴

7 **Q. Are these the same standards discussed in PGE’s testimony?**

8 A. Yes. Staff and PGE apply the same legal standards. However, PGE and
9 Staff disagree on what ROE is commensurate with that of other utilities and
10 other investment opportunities with risk exposure similar to PGE’s. When
11 investors’ expected rate of return is measured using a reasonable expectation
12 of long-term growth, and when risk is measured using an appropriate peer
13 group of utilities, the resulting ROE is within the range recommended by Staff.

14 **WHAT IS NEW IN THIS RATE CASE?**

15 **Q. What is new in this third general rate case that PGE has filed in as**
16 **many years?**

17 A. Two primary considerations arise in this rate case for the Company. First,
18 this is the Company’s third consecutive annual rate case. The two prior
19 general rate cases were in Docket No. UE 283 and Docket No. UE 262. In
20 Docket No. UE 283 (PGE’s 2014 General Rate Case), PGE requested and
21 was granted two tariff riders for recovering the costs of two major generation

⁴ See ORS 756.040(1) (a) and (b).

1 capital projects: Port Westward II of up to approximately \$300 million of
2 capital costs and Tucannon River Wind Farm of approximately up to \$500
3 million of capital costs.⁵

4 Similarly, in this case, PGE seeks a tariff rider to include a new plant,
5 Carty, which is scheduled to be online late in the first half of the 2016 test
6 year. Multiple consecutive annual rate cases and prompt cost recognition of
7 new generation, transmission and substation facilities, including Carty, reduce
8 risk in the form of reduced regulatory lag and greater known certainty of cost
9 recovery.

10 This reduction in risk and regulatory lag merits a lower point ROE from
11 within a range of reasonable ROEs. For example: the Maryland Commission
12 recently found that a company that engages in consecutive annual filings
13 merited a lower than top end of range ROE due to the reduced risk.⁶

14 **Q. Do Staff's peer utilities in its ROE modeling file rate cases less**
15 **frequently?**

16 A. Yes, in the last five years, none of Staff's peer utilities has filed three
17 consecutive annual general rate cases. Please see Exhibit Staff/211.

18 **Q. What is the second consideration, not addressed in prior rate cases?**

19 A. A broad, consensus of federal government agencies, economists and referent
20 experts now project substantially lower long-term growth in US Gross
21 Domestic Product (GDP). Paired with another broad consensus that growth

⁵ Order No. 14-422 at 7-8.

⁶ Public Service Commission of Maryland, Order No. 85374, Case No. 9299, at 78 (February 22, 2013).

1 in US electricity sales will be less than the rate of GDP growth, this trend has
2 serious implications not yet considered when Commission
3 Order No. 14-422 was issued in the Company's last general rate case.

4 **Q. What is the primary implication of your second consideration?**

5 A. All else held constant in Staff's current modeling, the reduction in projected
6 long-term GDP growth translates into a 31 basis point downward shift in the
7 range of reasonable ROEs for PGE.

8 **Q. Could all these experts be wrong and might this be a temporary case
9 of broad group-think based on various international headwinds and
10 temporary economic setbacks?**

11 A. That is unlikely. US worker productivity has been declining. Fewer children
12 have been born annually since 2008. US immigration policy still awaits
13 overhaul. American average age is increasing. Europe, Japan and China are
14 undertaking huge stimulus programs. ... And so on.

15 It is possible that the definitive lack of a "bounce" in growth after the
16 recession and so many negative bits of economic news have caused
17 academic, business, and federal economic experts to be temporarily reluctant
18 to predict a long-run return to the historical average annual American growth
19 trends between 1983 and 2007 of 3.2 percent.⁷

20 **Q. How do you recommend the Commission address this economic
21 decline or transitional mark?**

⁷ See the Wall Street Journal Article, "In a Slow Economy, Negative Quarters Shouldn't Surprise" by Greg Ip published in the print edition on May 28, 2015. This article emphasized two drivers of low GDP growth: 1) Aging population and shrinking labor force, and 2) Lower productivity – output per worker.

1 A. Staff's analysis shows multiple growth rate levels. Staff recommends a 9.16
2 ROE that is in the midpoint of a reasonable range of ROEs, allowing for
3 further corroboration of a substantial downshift in American growth
4 expectations. This is a conservative point ROE given the available evidence
5 at this moment that supports a slower long term growth rate. Moreover,
6 Staff's assessment does not rely on lower modeling results associated with
7 many of the Company's suggested peers, and instead finds that Staff
8 screened, mid-capitalization (Mid-Cap), electric utilities closest to PGE's size
9 best fit investor expectations. Please see Exhibit Staff/203.

10 **Q. Are current economic conditions a "Goldilocks Moment" for Oregon**
11 **Public Utility Commission (OPUC) jurisdictional energy utilities?**

12 A. It will be easier to answer that question in historical hindsight. However, there
13 are three good reasons to believe financial conditions are near optimal now
14 for these utilities.

15 **Q. What is the first of these reasons?**

16 A. The first factor is insulation from global uncertainty. For example, Moody's
17 points out that nearly all of regulated continental US electric utility revenues
18 and operating expenses are denominated in US dollars providing a natural
19 hedge against sustained US dollar appreciation.

20 **Q. What is the second of these reasons?**

21 A. Next, continued low interest rates facilitate strategic investment to meet long-
22 run utility needs, while making predictable dividend-paying equities more
23 attractive to investors than global cyclical firms.

1 **Q. And what is the third element?**

2 A. A mix of negative and positive economic news extends the investor “flight to
3 quality / safety” freezing current conditions just right for regulated investor
4 owned utilities.⁸

5 **Q. Are you suggesting the Commission should consider whether current
6 economic conditions make jurisdictional utilities less risky than other
7 potential investments?**

8 A. Yes.

9 **Q. Further are you suggesting utilities that file multiple consecutive
10 annual general rate cases and receive expedited cost recovery for
11 new facilities face even less risk?**

12 A. Yes.

13 **Q. To recap, are the two new elements since the last PGE general rate
14 case: A) Consideration of a marked downturn in projected US long-
15 term GDP growth, and B) Consideration whether PGE itself faces
16 reduced risk even over prevailing beneficial economic conditions for
17 US regulated utilities?**

18 A. Yes. Enough has changed since PGE’s last general rate case, that the
19 Commission may want to reduce PGE’s point ROE substantially, depending

⁸ See “Economists’ Forecast: Here We Grow Again” by Kathleen Madigan, and “Why the Economy and the Fed Keep Getting Knocked Off Track” by Jon Hilsenrath in the print edition of the Wall Street Journal (WSJ) for May 15, 2015. Articles like the above and “Workers’ Productivity Declines Again” by Jeffrey Sparshott in the May 7, 2015, WSJ periodically deflate investor expectations for a return to pre-2008 economic conditions.

1 in part on the Commission's confidence in current consensus economic
2 forecasts of declining long-term GDP growth.

3 **OVERVIEW OF ROE POSITIONS**

4 **Q. Did you prepare tables showing current, PGE proposed and Staff
5 proposed overall cost of capital?**

6 **A. Yes, the following tables provide that information.**

7 **Table 1**

Currently Authorized (UE 283 Order No. 14-422)	PGE		
Component	Percent of Total	Cost	Weighted Average
Long Term Debt	50.00%	5.443%	2.722%
Preferred Stock	0.00%		0.000%
Common Stock	50.00%	9.680%	4.840%
	100.00%		7.562%

9 **Table 2**

PGE Proposed (UE 294)			(as filed)	
Component	Percent of Total	Cost	Weighted Average	ROR vs. Current
Long Term Debt	50.00%	5.433%	2.717%	
Preferred Stock	0.00%		0.000%	
Common Stock	50.00%	9.900%	4.950%	
	100.00%		7.667%	0.105%

10
11

1

Table 3

Staff - June 4, 2015 – UE 294 Recommended			TESTIMONY	
Component	Percent of Total	Cost	Weighted Average	ROR vs. Current
Long Term Debt *	50.000%	5.235%	2.618%	
Preferred Stock	0.000%		0.000%	
Common Stock	50.000%	9.160%	4.580%	
	100.00%		7.198%	-0.364%

* Reflects Average of Bloomberg Daily Forwards for Mo. of Apr. 2015
(LT Debt will be Updated in Reply Testimony)

2

3

Q. Describe the analysis underlying Staff's ROE recommendation.

4

A. I continue to rely primarily on two different multistage DCF models,⁹ applied using a cohort group of peer utilities, to estimate the expected return on common equity required by PGE investors. I compare the results of my DCF analysis with national historical electric utilities' authorized ROE values as a check on the reasonableness of my ROE estimates. I also input parameters from some of the models used by Dr. Villadsen into Staff's models and contrast the analytic outputs with Dr. Villadsen's results and with results from my two DCF models using Staff's inputs.

5

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12

Q. What is a Discounted Cash Flow (DCF) model?

13

A. A DCF model estimates the cost of equity by determining the present value of the future cash flows that investors expect to receive from holding common stock. The current stock price is assumed to reflect investors' expectations for the stock, including future dividends and price appreciation.

14

15

16

⁹ See, in Docket No. UE 115, the Commission's discussion of multistage versus single-stage DCF models in Order No. 01-777 at page 27.

1 The return on equity under the DCF model is the rate that equates the
2 current stock price and expected cash flows to investors.¹⁰ A DCF model has
3 three primary components: a current stock price, an expected dividend, and
4 an expected growth rate in dividends.¹¹

5 **Q. Describe the two DCF models that you used.**

6 A. My first model is a conventional three-stage Discounted Dividend Model,
7 which Staff denotes as a “30-year Three-stage Discounted Dividend Model
8 with Terminal Valuation based on Growing Perpetuity” (hereinafter referred to
9 as “Model X”). My second model is the “30-year Three-stage Discounted
10 Dividend Model with Terminal Valuation Based on P/E Ratio” (hereinafter
11 referred to as “Model Y”).

12 Both models require, for each proxy company analyzed by Staff, a
13 “current” market price per share of common stock, estimates of dividends per
14 share to be received in the years 2015 through 2019, annual rates of dividend
15 growth from 2020 through 2024, and a long-term growth rate applicable to
16 dividends beyond 2024.

17 The three stages of the models are: 1) 2015-2019, where I use Value
18 Line’s forecasts of dividends per share for each company; 2) 2019-2024,
19 wherein the rate of dividend growth converges from the average rate over the
20 2015-2019 period to the growth rate in of the third stage; which is, 3) 2025-
21 2044.

¹⁰ Order No. 01-777 at 26.

¹¹ Order No. 07-015 at 32.

1 Model X includes a terminal value calculation, in which I assume
2 dividends per share grown indefinitely at the rate of growth in Stage 3
3 (“growing perpetuity”). In contrast Model Y terminates in a sale of stock
4 wherein the price is determined by my escalated price/earnings (P/E) ratio.

5 **Q. Why did you use five years for Stages One and Two, and about 20 years**
6 **for Stage Three?**

7 A. I presume a 30 year horizon is relevant for investors. This is consistent with
8 long standing Staff practices including those of former Staff member, Steve
9 Storm in the NW Natural general rate case of Docket No. UG 221, which the
10 Commission adopted in Order No. 12-408. This time frame allows for
11 investor consideration of 30-year US Treasury Long Bond and other alternate
12 investment opportunities. I use five years for Stage One as that is the
13 timeframe for which VL estimates of future dividends are available. I use five
14 years for Stage Two as that seems a reasonable length of time for individual
15 companies’ dividend growth rates that are materially different from the growth
16 rate used in Stage Three (and common to all companies) to converge to a LT
17 dividend growth rate more representative of all electric utilities. I discuss the
18 mechanics of this convergence below. I use 15 to 20 years for Stage Three,
19 corresponding to forward projections from federal sources, and calculate a
20 terminal valuation for the sale of the Company’s stock in 2043.

21 **Q. How do you address dividend timing?**

1 A. Each model uses two sets of calculations that differ in the assumed timing of
2 dividend receipt. One set of calculations is based on the standard
3 assumption that the investor receives dividends at the end of each period.

4 The second set of calculations assumes the investor receives dividends
5 at the beginning of each period. Each model averages the unadjusted ROE
6 values¹² produced with each set of calculations for each peer utility. This
7 approach more closely replicates the “real world” quarterly receipt of
8 dividends by investors; i.e., it takes into account the time value of money.

9 **Q. What accounts for differences in peer capital structures?**

10 A. Each model employs the Hamada equation to calculate an adjustment for
11 differences in capital structure between each peer utility and the PGE
12 proposed and Staff-assumed capital structure for Portland General Electric.¹³
13 When few peer utilities are available, the Hamada equation offers greater
14 material adjustments.

15 In this case, where many peer electric utilities are available, Staff's
16 screening yields peers sufficiently close to the Company's capital structure
17 that the Hamada equation adjustments are less dramatic.

18 **Q. What price do you use for each peer utility's stock?**

19 A. I use the average of closing prices for each utility from the first trading day in
20 January, February, and March 2015.

¹² The technical term for each of these estimates is the “internal rate of return,” or IRR.

¹³ Staff describes this adjustment in recent cost of capital testimony. See, as an example, Staff's description in Docket No. UE 233 Exhibit Staff/800, Storm/54 through Storm/57.

1 **Q. Did you review the impact of using prices from any other day of these**
2 **months?**

3 A. No.

4 **Q. How do Staff's two DCF models differ?**

5 A. Model X uses the calculation of a growing perpetuity as part of the terminal
6 valuation in 2043. This may be the most common approach used in
7 multistage DCF models.

8 Model Y uses the current price-earnings (P/E) ratio¹⁴ multiplied by the
9 estimated earnings per share (EPS) in 2043, which establishes the stock's
10 "selling price" in 2043 for terminal valuation. I estimate the 2043 EPS
11 analogously with methods used to estimate the 2043 dividend in both models;
12 i.e., based on VL estimates to which multiple growth rates are sequentially
13 applied.

14 **Q. What is the purpose of Model Y?**

15 A. I followed Staff's practice in recent rate cases of including this model as a
16 method by which to incorporate the fact that most companies have estimates
17 of future EPS and future dividends growing at different rates. Utilizing EPS
18 that grows on a separate trajectory than dividends is the foundation for an
19 alternative means of terminal valuation.¹⁵

¹⁴ "Current" in this context means the price obtained, as previously described, divided by Value Line's estimated earnings per share (EPS); i.e., it is a forward P/E, not an historical P/E.

¹⁵ Please note that the approach used in this second model is not the same as using a singular estimate of the growth rate in EPS as the growth rate in dividends.

PEER SCREEN

1
2 **Q. How did you select comparable companies (peers) to estimate PGE's**
3 **ROE?**

4 A. I used companies that meet the following criteria as peer utilities to the
5 regulated electric utility activities of Portland General Electric:

- 6 1. Covered by VL as an Electric Utility;
- 7 2. Forecasted by VL to have Positive Dividend Growth;
- 8 3. S&P LT Issuer Credit Rating from S&P of BB+ to BBB+;
- 9 4. No Decline in Annual Dividend in Last Five Years Based on SNL;
- 10 5. Has 80 percent or greater Regulated Assets According to EEI;
- 11 6. Has 45 percent to 55 percent LT Debt in VL Capital Structure; and
- 12 7. Has No Recent Merger and Acquisition Activity.

13
14 **Q. Why do you eliminate companies that are not forecasted to have**
15 **positive dividend growth?**

16 A. There is evidence that investors find common stock of dividend-cutting utilities
17 less attractive. The FPL Group's Florida Power and Light and Niagara
18 Mohawk Power Corporation stock prices declined sharply after dividend
19 cuts.¹⁶ These real world findings are consistent with Staff's screening out
20 electric utilities that have recently cut dividends.

21 **Q. What cohort of companies resulted from your screens?**

22 A. Please see Staff/202 Muldoon/1-2 for detailed Staff screens and also for a
23 table that shows the list of peer utilities obtained from Staff screens and those

¹⁶ An example of investor reaction to dividend cuts is found in The New York Times article, "Niagara Mohawk Stock Dives After Dividend Suspension", published January 25, 1996.

1 obtained from PGE screens in the current rate case, as well as those
2 obtained by both Staff and PGE in Docket Nos. UE 262 and UE 283.

3 **SENSITIVITY ANALYSIS**

4 **Q. Did you perform sensitivities that evaluated the impact of peer selection**
5 **in this case?**

6 A. Yes, I also ran each of Staff's models imposing a Mid-Cap size screen of
7 between two and ten billion dollars capitalization reflecting PGE's financial
8 size. This Mid-Cap sensitivity analysis increased my top reasonable range of
9 ROEs by an additional 49 basis points over that obtained using the
10 Company's peer utilities in Staff's three-stage DCF modeling.

11 **Q. How does Staff apply informed judgement to its modeling?**

12 A. Staff examined its full range of modeling results from 8.27 percent to 9.57
13 percent after all adjustments. Within that range Staff determined that 8.75
14 percent to 9.57 percent, reflecting mid-cap size capitalization like PGE was
15 the best fit to capture investor expectations of PGE performance. Please
16 note that this range still incorporates the highest growth from PGE's last
17 general rate case.

18 **Q. Does Staff's removal of the lower end of modeling results from 8.27**
19 **percent to 8.74 percent suggest Staff's results are reasonable and**
20 **conservative?**

21 A. Yes, this is a representative indicator that Staff recommendations are
22 balanced, fact based and reasonable.

1 **Q. Does the running of these sensitivities replace or modify Staff's primary**
2 **screening methods?**

3 A. No. However, the results of my sensitivity analyses inform the Commission.
4 Utility capitalization size is a selection metric for investors and can affect
5 investor expectations. By performing the Mid-Cap sensitivity, Staff
6 reasonably addresses firm size.

7 **Q. Did the sensitivity of processing Company peer utilities through Staff's**
8 **three-stage DCF modeling generate useful information?**

9 A. No. The results from Staff's peer utilities and the results from the Mid-Cap
10 sensitivity group bracketed and included the set of results using the
11 Company's peers. Staff higher Mid-Cap results better fit PGE's prospects
12 than lower modeling results associated with many Company proposed peers.

13 GROWTH RATES

14 **Q. What is the single most important element of discounted dividend or**
15 **DCF models when used to estimate investors' required ROE?**

16 A. The estimated rate of growth of future dividends. I refer specifically to the
17 singular growth rate for constant growth DCF models and the long-term
18 growth rate for multistage DCF models such as those I use.

19 **Q. What long-term growth rates do you use in the two DCF models?¹⁷**

¹⁷ Methods used here related to GDP-based growth rates are similar, if not identical to methods Staff has used in past proceedings. See, as an example, Staff's discussion of these methods and, to a limited extent, their conceptual underpinnings in Docket No. UE 233, at Exhibit Staff/800, Storm/46 line through Storm/52 line 14.

1 A. I used four different long-term growth rates, with different methods employed
2 in developing each.

3 The first method uses a 50 percent weight applied to the average annual
4 growth rate resulting from estimates of long-term Gross Domestic Product
5 (GDP) by the EIA, the OMB, and the CBO, with each receiving one-third of
6 the 50 percent weight.¹⁸ The remaining 50 percent is the average annual
7 historical real GDP growth rate, established using regression analysis, for the
8 period 1980 through 2014,¹⁹ to which I apply the TIPS inflation forecast.

9 The second long-term growth rate for Stage 3 dividends is a control
10 reflecting PGE's Blue Chip & OMB growth rate.

11 The third Stage 3 annual growth rate, which I use primarily for illustrative
12 purposes, is the Indiana / Top-10 Blue Chip most recent optimistic upper
13 book-end projection as of April 2015.

14 The fourth final stage growth rate is the Company's Top-10 Blue Chip
15 most optimistic upper book-end projection of growth from PGE's prior general
16 rate case in Docket No. UE 283.

¹⁸ The EIA is the Energy Information Administration within the US Department of Energy, OMB is the Office of Management and Budget, and CBO is the Congressional Budget Office. EIA and OMB's estimates are of nominal GDP. I applied to CBO's estimate of real GDP an inflation rate for the relevant timeframe developed using the Treasury Inflation-Protected Securities (TIPS) method described by Staff in testimony in multiple recent general rate case proceedings. See, as an example, in Docket No. UE 233 Exhibit Staff/800, Storm/50 line 4 through Storm/51 line 3. The TIPS forecast of annual inflation over the relevant Stage 3 timeframe is 2.12 percent, based on an average of interest rates for each of the months of January 2014, February 2014, and March 2014. It may be useful to think of the TIPS inflation rate forecast as a forward curve of dollars; i.e., market-based estimates of what a dollar will be worth in the future.

¹⁹ Staff discussed this approach in recent Staff cost of equity testimony in several rate case proceedings. See, as an example, in Docket No. UE 233 Exhibits Staff/800, Storm/46, line 15 through Storm/50 line 3.

1 **Q. What are the values for these growth rates?**

2 A. Please see Tables 4-A and 4-B below.

3 **Table 4-A**
4 **GDP Growth Rates**

Stage 3 – Long-Term Annual Dividend Growth Rate					
Component	Real Rate	TIPS Inflation Forecast	Nominal Rate	Weight	Weighted Rate
<i>EIA 2014 Placeholder</i>	2.40%	2.12%	4.57%	16.70%	0.76%
OMB - White House 2016 Budget			4.30%	16.70%	0.72%
CBO			4.20%	16.70%	0.70%
Historical 1980 – 2014	2.87%	2.12%	5.05%	50.0%	2.53%
Composite				100%	4.71%
Historical 1980 – 2014 Q4			5.05%	100.0%	5.05%
Indiana U – Kelley 2018-35 Ctr Econometric Research	2.90%	2.12%	5.08%	100.0%	5.08%
Blue Chip* – Top 10% 2019 Values	2.90%	2.12%	5.08%	100.0%	5.08%
Blue Chip – Average	2.40%	2.12%	4.57%	100.0%	4.57%
Blue Chip – Bottom 10%	1.90%	2.12%	4.06%	100.0%	4.06%
PGE "Blue Chip" 2015 thru 2019 Average	PGE/1101 Villadsen P3		4.70%	100.0%	4.70%
PGE "Blue Chip & OMB"	PGE/1101 Villadsen P4		4.80%	100.0%	4.80%
Blue Chip* – Top 10% 2021-2025 Values	2.70%	2.12%	4.88%	100.0%	4.88%
Blue Chip – Average	2.30%	2.12%	4.47%	100.0%	4.47%
Blue Chip – Bottom 10%	2.00%	2.12%	4.16%	100.0%	4.16%
Blue Chip* – Top 10% 2021-2025 Values	Nominal		5.00%	100.0%	5.00%
Blue Chip – Average			4.40%	100.0%	4.40%
Blue Chip – Bottom 10%			3.90%	100.0%	3.90%

5
6 **Q. Briefly explain why PGE's long-term growth values may not be**
7 **appropriate.**

1 A. PGE draws its long-term growth values as the average value for 2015-2019.
2 In contrast use of 2021 to 2025 Average Blue Chip Values drops growth by
3 23 to 30 basis points depending on calculation method. PGE's reliance on
4 nearer term numbers diminished exposure to a precipitous drop in projections
5 of long-term GDP growth.

6 **Q. How deep and how universal are these expectations of diminished US**
7 **long-term GDP growth?**

8 A. Even the most optimistic in Top-Ten Blue Chip and academic experts no
9 longer project upbeat US growth. See Table 4-B below:

10 **Table 4-B**
11 **One Year Change in GDP Growth Projections**

Growth Trends	UE 294	UE 283	Difference
	Now	Prior	
Tips Inflation Forecast	2.12%	2.35%	-0.23%
EIA	4.57%	4.89%	-0.32%
OMB	4.30%	4.61%	-0.31%
CBO	4.20%	4.55%	-0.35%
Composite	4.71%	5.02%	-0.31%
Historical 1980 – 2013	5.05%	5.35%	-0.30%
Indiana / Top 10 Blue Chip	5.08%	5.78%	-0.70%

12

13 **Q. At the time of the last PGE general rate case, weren't there fears that**
14 **inputs to long-term growth were eroding in the US?**

15 A. There were articles like the May 9, 2014, edition of the *Oregonian*, "Fear of
16 Economic Blow as Births Drop around World" by Associated Press business

1 writer, Bernard Condon.²⁰ But the drop in birth rates was not yet built into last
2 year's forecast numbers.

3 **Q. Were global economic inputs like a strong US dollar and quantitative**
4 **easing stimulus in Japan and Europe also new to this year's forecasts?**

5 A. Yes.

6 **Q. Why does Staff recommend caution in applying the downward impact of**
7 **current long-term growth forecasts?**

8 A. First, this is a substantial downward revision in expectations – It may be
9 reasonable to move slowly and make sure these projections are durable.
10 Also, PGE's rate case is one of the first to be considered as America curbs
11 long-term expectations, so there is no body of comparable rate case
12 decisions that fully recognize recently released downward long-term growth
13 projections.

14 **Q. How will Staff follow up on this topic in reply testimony?**

15 A. Staff's reply testimony will further evaluate these issues and provide any
16 available updates to long-term growth projections.

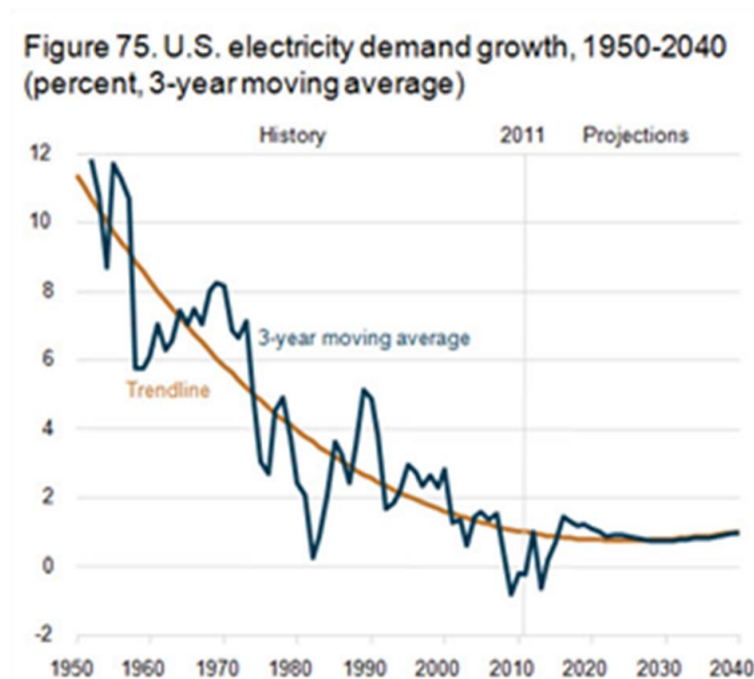
17 **Q. Is it appropriate to use estimates of long-term GDP growth rates to**
18 **estimate future dividends for electric utilities?**

19 A. Yes. Based on information from the EIA, electricity use per 2005 dollar of
20 GPD has been declining over the past 30 years and EIA expects the decline

²⁰ See UE 283 Staff/200 Muldoon/14-15.

1 to continue through 2040.²¹ EIA attributes this decline in the growth of
 2 electricity usage in part to more efficient appliances and equipment. Total
 3 electricity demand grows by just 0.9 percent per year in EIA's primary
 4 projection. See Staff Figure 1 – EIA Figure 75 below.

5 **Figure 1**
 6 **EIA Figure 75**



7 **Q. Please Summarize.**

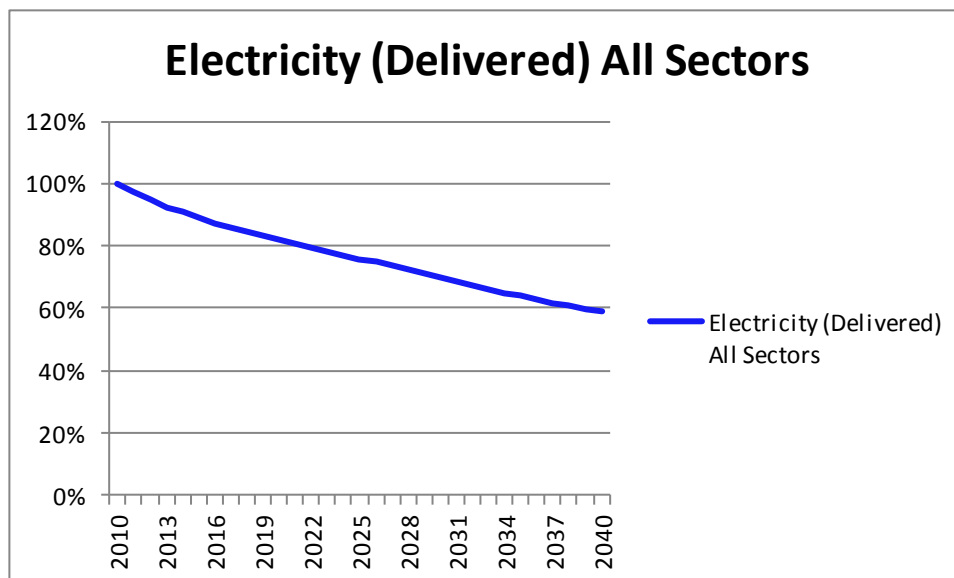
8 A. EIA projects GDP will grow at an average of 2.5 percent from 2011 through
 9 2040. However, EIA projects both delivered residential electricity use and
 10 separately delivered electricity use for all sectors combined to grow in the
 11 same period at an average of only 0.70 percent, without factoring in electricity

²¹ Staff accessed EIA's "Annual Energy Outlook, at
http://www.eia.gov/forecasts/aeo/MT_electric.cfm#growth_elec

1 losses expected to grow 0.4 percent per year on average over this period.

2 See Figure 2 below.

3 **Figure 2**
4 **Delivered Electricity as Percent of GDP**
5 **Proportional to 2010**



6 **Q. Do you use an annual rate of long-term growth less than that estimated**
7 **for GDP, given the EIA's outlook for the industry, as illustrated in**
8 **Figures 1 and 2?**

9 A. No. It is possible that my modeling overstates required ROE for this reason.

10 **Q. What are the results of your multistage DCF models?**

11 A. Please see Staff Exhibit 203 for a summary followed by modeling detail.

12 **Q. How do these estimated ROE values compare with national historical**
13 **electric utilities' ROE values for 2014 General Rate Cases?**

- 1 A. These estimated ROEs are low compared with regulated US utilities'
2 authorized return on equity capital in 2014 as reported by SNL Financial, LC
3 shown below in Figure 3.

4 **Figure 3**

5 **Average ROE in Rate Cases by Quarter & (Quantity of GRCs)**

	1st Quarter	10.23	(8)
	2nd Quarter	9.83	(5)
	3rd Quarter	9.87	(12)
	4th Quarter	9.78	(13)
2014	Full Year	9.91	(38)

6

- 7 **Q. Would it be reasonable to think that the decision makers setting 2014**
8 **ROEs could have anticipated a dramatic drop in Spring-2015 projections**
9 **of long-term GDP growth?**

10 A. No. Many of the official projections were not released until April of 2015.

- 11 **Q. Why do you address equity flotation costs when PGE is resolving its**
12 **equity forward, but not issuing additional new equity now?**

13 A. My 12.5 bps upward adjustment is a durable modifier reflecting aggregate
14 overall long-term cost to float new equity into perpetuity.

- 15 **Q. What is the Company's requested ROE?**

16 A. PGE asks for an authorized ROE of 9.9 percent.

- 17 **Q. Have you reviewed Dr. Villadsen's discussion and recommendations**
18 **related to the Company's requested ROE?**

1 A. I have. Dr. Villadsen's analysis includes constant growth (single stage;
2 Gordon growth) DCF modeling, multi-stage DCF Modeling, risk premium
3 estimates, and CAPM.

4 **Q. What is your assessment of Dr. Villadsen's DCF analysis and results?**

5 A. Dr. Villadsen's modeling of ROE incorporates atypical methods in models that
6 have not been found reliable by the Commission in the past. Staff
7 recommends the Commission use the more realistic expectations applied in
8 Staff's modeling.

9 **Q. The Commission's decision regarding a just and reasonable point value
10 for ROE may hinge on growth rates. Did your analysis include the
11 construction of a synthetic forward curve using UST TIPS break even
12 points?**

13 A. Yes. My forward curve is provided in Staff Exhibit 204, reflecting implied
14 market-based inflationary expectations. Staff's recommendations are
15 consistent with market activity indicating investor expectations of future
16 inflation.

17 **Q. What if one ignored current downward adjustments by a broad
18 spectrum of federal agencies and presumed future US GDP growth
19 would look like the past 30 years – would a ROE based on that
20 assumption fall within Staff's recommended range?**

21 A. Yes, Staff extracted and ran regression on 1980 through 2014 data from US
22 BEA to generate the annual real historical GDP growth rate shown in Table 5.

1 Staff's recommended range of ROEs includes values presuming GDP growth
2 over the next thirty years would look like that of the past 30 years?

3 However, the US White House and Congress as well as myriad federal
4 experts expect long term GDP growth to be less than an extrapolation of
5 historical GDP growth. A conservative projection would therefore be lower
6 than GDP growth over the last several decades, not higher.

7 **Q. Does Staff show this analysis in its exhibits?**

8 A. Yes. Staff Exhibit 205 shows Staff's analysis in support of this finding.

9 **Q. And Staff's positions are corroborated by federal sources?**

10 A. Yes. Please see Staff Exhibit 206 for a representative sample.

11 **Q. If utilities' dividends and earnings per share are growing at a faster rate
12 than growth for the whole economy, then utilities would become a
13 bigger part of the economy. Is that happening?**

14 A. No. Electric utilities are not becoming a larger and larger part of the US.²²

15 **Q. What do you recommend to the Commission regarding Dr. Villadsen's
16 results from her constant growth DCF model?**

17 A. Dr. Villadsen's constant growth DCF model offers little to inform the
18 Commission in this case. For example, the Commission rejected
19 consideration of parties' constant growth DCF models in

²² See UE 283 Staff/200, Muldoon/17-22.

1 Docket No. UE 115.²³ I recommend the Commission give little weight to the
2 results of Dr. Villadsen's model.

3 **Q. How do Staff's methods employed in this case differ from those utilized**
4 **by Staff in PGE's prior general rate cases, UE 283 and UE 262, and by**
5 **Staff in the recent Northwest Natural Gas Company rate case, UG 221?**

6 A. I examine several sensitivities that have the effect of increasing the upper
7 range of my range of ROE reasonableness. I also have one adjustment for
8 common equity flotation costs that shifts my entire range of reasonable ROEs
9 upward by 12.5 bps. Otherwise my methods and modeling are very similar to
10 those employed by Staff in recent general rate cases, including UE 283.

11 **ALTERNATIVE MODELS EXAMINED**

12 **Q. What control modeling does Staff perform to corroborate DCF results?**

13 A. I examine several alternative models that support Staff's DCF modeling.
14 While I do not recommend that any alternate approach should replace the
15 Commission's reliance on three-stage DCF modeling, such alternate models
16 may offer a check on the reasonableness of Staff's recommendation.

17 **SINGLE-STAGE GORDON GROWTH DCF MODELING**

18 **Q. Did you first examine the Company's constant Gordon growth DCF**
19 **model described in PGE/1100, Villadsen/36?**

20 A. Yes. However, I note that Brealey, Myers and Allen, in the tenth edition of
21 their textbook "Principles of Corporate Finance" caution that "the simple

²³ See page 27 of Order No. 01-777. See also page 24 of Order No. 01-787 in Docket No. UE 116.

1 constant-growth DCF formula is an extremely useful rule of thumb, but no
2 more than that.”²⁴

3 **Q. Does Staff see this model as simply an extremely imprecise vector**
4 **pointing closer to 10 percent ROE than 5 percent ROE or 15 percent**
5 **ROE?**

6 A. Yes. As calculated by PGE, this vector would point toward the top end of
7 Staff’s three-stage DCF results when considering a point ROE from among a
8 reasonable range of ROEs.

9 **Q. Looking at Exhibit PGE/1101 Villadsen/2, please explain why you are**
10 **uncomfortable relying overly much on this simple Gordon growth**
11 **model.**

12 A. If we narrow in on Idaho Power in Panel A on that page, we see a simple
13 Gordon Growth model generated 5.7 percent required return for Idaho Power.
14 Staff is skeptical that Idaho Power would agree that that single data point
15 represents a reasonable value for that utility. Gordon Growth makes the
16 academic assumption that information about returns forever is all contained in
17 just a few values: namely the last dividend and an appropriate very long-term
18 average growth rate.

19 **Q. Why is this not plausible in the real world?**

20 A. Were Gordon Growth even somewhat accurate, success in investing would
21 be assured and there would be less need for the omnipresent investment
22 disclaimer, “Past Performance is No Guarantee of Future Results”. Staff

²⁴ “Principles of Corporate Finance”, Brealey, Myers, and Allen, p 83 (10th Edition 2010).

1 recommends the Commission continue to assign little or no weight to Gordon
2 Growth modeling and to be very skeptical of findings that average such weak
3 extrapolations equally with results from much higher confidence modeling.

4 **Q. What would be a better way to think of single-stage Gordon Growth DCF**
5 **results than averaging such with other methods equally?**

6 A. Staff's three-stage DCF result of 9.13 percent point ROE is the two-thirds
7 point in a range of 8.27 percent to 9.57 percent. Some investors may
8 interpret the results of a single-stage DCF model as recommending the upper
9 end of Staff's range of reasonable and supportable ROEs for PGE, absent
10 other considerations.

11 **RISK PREMIUM MODELING**

12 **Q. Did you examine Dr. Villadsen's risk premium modeling in PGE/1100?**

13 A. Yes, and Staff's reply testimony will address this and other modeling
14 performed in this case by ICNU. However, I found PGE's results are skewed
15 by reliance on the thinly traded and unrepresentative 20-year UST.

16 **Figure 4**



1 Figure 4 above shows that the cost between 10-year and 30-year most
 2 commonly issued long-term utility bonds is not linear. Rather costs curve
 3 upward proportionally for a 20-year bond as shown by the following basic
 4 Bloomberg chart. 20-year bonds comprise so little of OPUC jurisdictional
 5 debt as to be almost entirely divorced from any hope to extrapolate historical
 6 data for some other group of companies to predict forward looking utility
 7 experience.

8 **Q. Are you saying that utilities like PGE tend not to issue 20-year debt**
 9 **other than in private placement or when that maturity is specifically**
 10 **beneficial due to low rates or debt maturity considerations as in the May**
 11 **2015 PGE issuance?**

12 A. Yes, PGE bonds issued May 2015 will mature in a year
 13 with no other maturing debt. But studying 20-year debt
 14 offers little insight to PGE's historical experience and
 15 likely has no predictive value regarding the Company's
 16 required ROE with investors, other than as shown above.
 17 The thin market skews spreads upward over underlying
 18 UST. As you can see to the right there is not enough investor interest in 20-
 19 year debt for UST of this maturity to merit daily reporting in the Wall Street
 20 Journal.²⁵

Bond Market Overview	
US Treasurys	
8:29 p.m. EDT 05/21/15	
1-Month Bill	0.020
3-Month Bill	0.018
6-Month Bill	0.079
1-Year Note	0.191
2-Year Note	0.581
3-Year Note	0.955
5-Year Note	1.517
7-Year Note	1.916
10-Year Note	2.192
30-Year Bond	2.986

²⁵ See the WSJ, Bond Markets Overview daily at www.WSJ.com. Staff accessed this page on June 2, 2015 at <http://www.wsj.com/public/page/news-fixed-income-bonds.html>.

1 **Q. Are the UST rates included in your response above a representative**
2 **snapshot of where fixed income rates are heading?**

3 A. No. John Lonski, Chief Economist of Moody's Capital Markets Research, Inc.
4 in Credit Markets Review and Outlook released March 21, 2015, called the
5 current state of business activity "mediocre".²⁶ His assessment is that the
6 recent jump by Treasury yields may have overstated any rise by inflation risk,
7 and that there are no "observable facts" behind it. If he is right, UST prices
8 will rise and yields fall once again, absent news recommending otherwise.
9 Rather, the important thing to note is that investors and publications for
10 investors first track 10-year UST, often track 30-year UST and very seldom
11 track or report 20-year debt.

12 **Q. Are risk premium conclusions also impacted by data timing?**

13 A. Yes. Inclusion or exclusion of the crisis years in Figure 5 below demonstrates
14 how spreads and their implications would vary by years studied:

15 **Q. Does Dr. Villadsen also use 20-year UST in CAPM modeling?**

16 A. Yes. This is peculiar enough to note. Dr. Villadsen adds the spread between
17 20-year and 10-year government bond yields to create a synthetic forward,
18 which shifts expected results upwards by about one percent.

19 **Q. Is this necessary or typical?**

20 A. No. Bloomberg forwards directly provide this information.

²⁶ Staff accessed Moody's reporting on May 22, 2015 at
https://www.moodys.com/researchdocumentcontentpage.aspx?docid=PBC_181342

1 **Q. Is there good reason to believe that PGE's examination of historical**
2 **fixed income data is not predictive of the future – not even to describe**
3 **conditions in 2016 at the end of the test year?**

4 A. Yes. The US Federal Reserve (Fed) is considering whether the financial crisis
5 and Great Recession permanently slowed the US economy's growth
6 potential, thereby lowering the point at which the Fed's benchmark interest
7 rate should be considered neutral. April Fed policy minutes released May 20,
8 2015, defined this "equilibrium rate" as the level of the Fed funds rate,
9 adjusted for inflation, consistent with the economy achieving, over a specified
10 time horizon, maximum employment and price stability.²⁷

11 **Q. Are you implying that Fed management of rates might not match an**
12 **extrapolation of prior fixed income activity?**

13 A. Yes, extrapolating historical data would have difficulty predicting trillion dollar
14 quantitative easing stimulus in the US, EU and Japan. How the Fed defines
15 its target states can impact the timing and nature of Fed actions which may
16 overwhelm historic fixed income against common equities comparison trends.

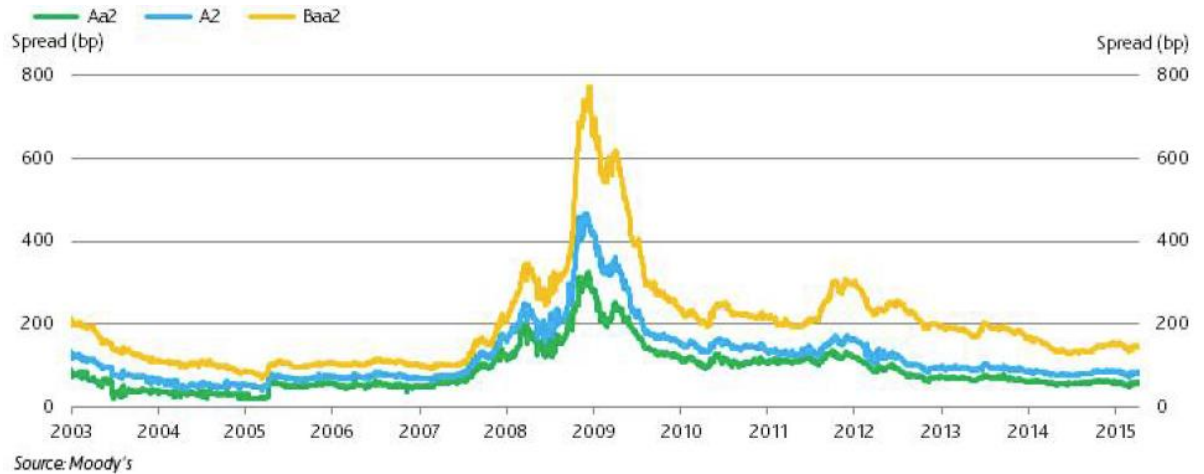
17 **Q. Do credit ratings heavily impact spreads over UST?**

18 A. Yes, consideration of bonds that poorly mirror PGE's first mortgage bond
19 (FMB) ratings could substantially inflate implied spreads over UST. Below in
20 Figure 5, Moody's shows that bringing in lower rated bonds can boost

²⁷ Staff accessed the WSJ article, "A New, Lower Normal for Fed Rates? Fed Officials' Lively Debate" by Pedro Nicolaci da Costa on May 22, 2015, at www.WSJ.com.

1 spreads over UST by one percent. Inclusion of low rated bonds for 2009 can
2 further escalate implied impacts.

3 **Figure 5**



4

5 **Q. Please discuss the Ibbotson approach you used.**

6

7 A. The Research Foundation of CFA Institute, an impartial non-profit
8 organization, published "Rethinking the Equity Risk Premium" in 2011.
9 Herein, Professor Roger Ibbotson of the Yale School of Management and
10 other earlier examiners of how best to approach and calculate equity risk
11 premiums share their current thinking and findings.

12

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19 "In the 85 years covered by the Ibbotson data, stocks delivered a real
20 return of 6.6% against 2.1% for bonds, supporting a 4.5% equity risk
21 premium."²⁸ Adding that 4.5 percent to Dr. Villadsen's 4.41 percent long-term
22 UST rate for 2015 to 2016, would suggest that an investor looking just for a
23 quick rough estimate should demand about an 8.9 percent ROE to be
24 satisfied to own a stock of average risk in 2015 to 2016.

28 "Rethinking the Equity Risk Premium," Research Foundation of CFA Institute p 81 (2011).

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REBUTTAL OF PGE'S CAPM MODELING

Q. Did you examine and make adjustments to PGE's CAPM modeling yielding different results than Dr. Villadsen?

A. Yes. The Company generates both a variant of traditional CAPM and ECAPM. As I see no investor or fund management firm using ECAPM, I suggest the Commission afford ECAPM no weight whatsoever. For CAPM, I note that the Company relies on a 6.96 percent market risk premium. This is interesting in that that value could be seen as a long-run complete market return.

The Company also relies on the earlier discussed peculiar synthetic construct of 20 year bond spreads applied to Blue Chip Economic Indicators. Unaware of anyone with money at risk using such a method, I rely directly on average April 2015 Bloomberg forward 10- and 30-year UST yields for January 15, 2016. This removes up to about one percent off of the risk free rate. My 3.09 percent 10-year and 3.83 percent 30-year risk free rates are both examined to generate a range of reasoned returns.

I also calculate expected returns using both Value Line and Yahoo Finance Betas which employ different indices, sampling methods and assumptions about mean reversion. Relying on an Ibbotson market risk premium of 4.50 percent, I see a range of expected return of 5.53 percent to 7.32 percent. These values are markedly lower than the expected returns shown on PGE/1104 Villadsen/2.

Q. What do you conclude regarding the direction CAPM offers?

1 A. The Company appears to ignore the low end of industry practice using
2 CAPM. PGE also relies on a high market risk premium. PGE uses 20-year
3 debt rather than typical 10- and 30-year teaching and money management
4 methods. PGE also focuses on after tax cost of long-term debt out of context.
5 When Staff's typical finance approach is added to PGE's CAPM work, the
6 result is a lower return on capital midpoint.

7 **Q. What are Staff's intermediate CAPM findings?**

8 A. Staff's modeling alone generates a 7.32 percent return on peer equity at the
9 high end of pre-tax CAPM results considering both 10- and 30-year UST as
10 risk free rates, and considering both Value Line and Yahoo Finance Betas.

11 **Q. Understanding that both Staff and the Commission have placed minimal**
12 **weight on CAPM modeling results and that Staff only discusses**
13 **Company results as a check in due diligence on Staff findings, what is**
14 **the implication of CAPM expected returns on risky assets?**

15 A. William Forsyth Sharpe, Professor of Economics at Stanford and one of
16 winners of the 1990 Nobel Memorial Prize in Economic Sciences for the
17 CAPM suggests that the expected return on a portfolio of stocks, as
18 estimated by CAPM should approximate the peer securities' cost of capital.

19 In the context of this rate case CAPM can be interpreted as a downward
20 pointing vector suggesting that one can reasonable look at less than the
21 upper end of Staff's three-stage DCF modeling results. Table 5 below shows
22 a typical CAPM model inclusive of common variations.

23

1

Table 5 – Typical CAPM Modeling

3.09%		Risk Free Rate as 10 Yr UST as of Jan. 15, 2016				$R_{PGE} = R_f + \text{Beta} * \text{MRP}$			
3.83%		Risk Free Rate as 30 Yr UST as of Jan. 15, 2016				w 10 Yr Forward UST		w 30 Yr Forward UST	
4.50%		Ibbotson Market Risk Premium				CAPM	CAPM	CAPM	CAPM
#	Abbreviated Utility	UE 294 PGE	UE 294 Staff	Ticker	w VL Beta	w Yahoo Beta	w VL Beta	w Yahoo Beta	
1	AEP	Yes	Yes	AEP	6.24%	5.34%	6.98%	6.08%	
2	Allete	Yes	No	ALE	6.69%	7.59%	7.43%	8.33%	
3	Alliant	Yes	No	LNT	6.69%	5.66%	7.43%	6.40%	
4	Ameren	Yes	No	AEE	6.47%	5.84%	7.21%	6.58%	
7	CenterPoint	Yes	No	CNP	6.47%	5.93%	7.21%	6.67%	
10	CMS	Yes	No	CMS	6.24%	3.72%	6.98%	4.46%	
11	Consol Ed	Yes	No	ED	5.79%	4.08%	6.53%	4.82%	
12	Dominion	Yes	No	D	6.24%	4.62%	6.98%	5.36%	
13	DTE	Yes	Yes	DTE	6.47%	4.67%	7.21%	5.41%	
15	Edison Int'l	Yes	Yes	EIX	6.47%	5.12%	7.21%	5.86%	
16	El Paso	Yes	No	EE	6.24%	5.93%	6.98%	6.67%	
18	Entergy	Yes	No	ETR	6.24%	4.94%	6.98%	5.68%	
21	Great Plains	Yes	Yes	GXP	6.92%	6.65%	7.66%	7.39%	
23	IDACORP	Yes	Yes	IDA	6.69%	7.19%	7.43%	7.93%	
26	MGE	Yes	No	MGEE	6.24%	6.87%	6.98%	7.61%	
31	OGE	Yes	No	OGE	7.14%	6.15%	7.88%	6.89%	
32	Otter Tail	Yes	Yes	OTTR	7.14%	8.13%	7.88%	8.87%	
34	PG&E	Yes	Yes	PCG	6.02%	4.71%	6.76%	5.45%	
35	PGE	Yes	No	POR	6.69%	6.24%	7.43%	6.98%	
36	Pinnacle	Yes	No	PNW	6.24%	5.75%	6.98%	6.49%	
37	PNM	No	Yes	PNM	6.92%	6.20%	7.66%	6.94%	
39	Public Serv.	Yes	No	PEG	6.47%	5.340%	7.21%	6.08%	
40	SCANA	Yes	No	SCG	6.47%	4.71%	7.21%	5.45%	
41	Sempra	Yes	No	SRE	6.47%	4.71%	7.21%	5.45%	
42	Southern	Yes	No	SO	5.57%	4.08%	6.31%	4.82%	
46	Vectren	Yes	No	VVC	6.69%	6.65%	7.43%	7.39%	
47	Westar	Yes	Yes	WR	6.47%	5.34%	7.21%	6.08%	
49	Xcel	Yes	No	XEL	6.02%	4.22%	6.76%	4.96%	
	Peers:	27	9	Peers					
		Avg	Peers	PGE	6.41%	5.53%	7.15%	6.27%	
		Avg	Peers	Staff	6.58%	5.77%	7.32%	6.51%	
				Range	From:	5.53%	To:	7.32%	
					Staff	Midpoint	6.43%		

2

3

Q. What is the formula used above?

4

A. The formula follows in Figure 6.

1

Figure 6 – CAPM Formula

$$\bar{r}_a = r_f + \beta_a (\bar{r}_m - r_f)$$

Where :

 r_f = Risk free rate β_a = Beta of the security \bar{r}_m = Expected market return $(\bar{r}_m - r_f)$ = Equity market premium

2

3

Q. PGE's current Rate of Return (ROR) is 7.560. Do lower CAPM results, while holding PGE's Cost of LT Debt unchanged from the last general rate case, suggest that PGE's required ROE could be lower?

4

5

6

A. Yes, CAPM modeling contains more information than Gordon Growth estimations and does suggest that PGE's required ROE should be lower than currently authorized, however Staff recommends that the Commission put little weight on this methodology.

7

8

9

10

Q. Why does Staff feel it is necessary to rebut PGE's CAPM testimony and to clarify that one normally calculates CAPM using a 10-year UST yield or the 30-year UST as the risk free rate; and logically relies on average Bloomberg forwards and an Ibbotson market premium rather than unique synthetic approximations of what these values might be?

11

12

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14

15

A. Though the Commission does not favor CAPM, Staff conducted its review considering that the Commission could alter its policy going forward.

16

17

Q. Does Staff disagree with PGE's use of after tax long-term debt to derive required ROEs from CAPM?

18

1 A. Yes. While one can multiply the before-tax rate by one minus the marginal
2 tax rate to calculate after-tax cost of long-term debt, it would be illogical to do
3 so in this instance.

4 **Q. Why is that? Don't investors care about after-tax cost of capital?**

5 A. Investors do care about their returns after taxes. However, PGE, as shown in
6 Table 2 above, asks for consideration of a proposed 5.443 pre-tax cost of
7 long-term debt in considering the Company's required rate of return (ROR).

8 PGE does not ask for the lower after-tax 3.755 percent cost of long term
9 debt resulting in a lower 6.827 percent ROR. So it would be illogical to use
10 after-tax cost of long-term debt in the same matrix to propose logical values
11 for reasonable ROE.

12 **Q. Please show Table 2 modified to show the range of results from the**
13 **CAPM model as typically deployed.**

14 A. Table 6 below shows these modeling results which consist of a range of
15 ROEs from 5.635 percent to 9.202 percent with a midpoint ROE of 7.418
16 percent.

17

1

Table 6 – Results from Typical Use of CAPM Model

Avg Tax Rate		2015	2017-2019	
Co Peers		32%	32%	
Staff Peers		30%	31%	
PGE Proposed (UE 294)			(as filed)	
Component	Percent of Total	Cost	Weighted Average	ROR vs. Current
Long Term Debt	50%	5.433%	2.717%	
Preferred Stock	0%		0.000%	
Common Stock	50%	9.900%	4.950%	
	100%		7.667%	7.667%
High End				
ROE ex PreTax CAPM			(LT Debt as filed)	
Component	Percent of Total	Cost	Weighted Average	ROR vs. Current
Long Term Debt	50%	5.433%	2.717%	
Common Stock	50%	9.202%	4.601%	
	100%		7.318%	7.318%
Low End				
ROE ex PreTax CAPM			(LT Debt as filed)	
Component	Percent of Total	Cost	Weighted Average	ROR vs. Current
Long Term Debt	50%	5.433%	2.717%	
Common Stock	50%	5.635%	2.817%	
	100%		5.534%	5.534%
PreTax Range of CAPM ROE's				
	From	5.635%	to	9.202%
		Midpoint		7.418%

2

3

4

Q. Is Staff saying that persons managing money at risk gain little new information from a typically calculated CAPM, other than a downward

1 **vector recommending use of the midpoint or lower in Staff's other**
2 **modeling?**

3 A. Yes. Staff is merely showing how CAPM is usually calculated in comparison
4 with the calculations PGE has prepared for the Commission's consideration.
5 And given the low pointing vector, the Commission may want to consider a
6 lower point ROE than the highest modeling result in Staff's range of
7 reasonable ROEs.

8 **PGE'S COMPARATIVE RISKINESS**

9 **Q. Is PGE a regulated utility that enjoys various revenue smoothing and**
10 **guaranteeing mechanisms and also just had a credit rating increase?**

11 A. Yes. Moody's upgraded PGE's ratings on January 30, 2014, but S&P has not
12 followed with a like upgrade to date.

13 **Q. Noting that PGE is self-building multiple generation plants, is PGE more**
14 **or less risky than the average electric utility, and riskier or less risky**
15 **than the average publicly traded US stock?**

16 A. Common sense tells us that PGE is reflective of peer electric utilities of like
17 size and material statistics, absent other factors. PGE is without doubt less
18 risky than the average publicly traded US stock.

19 As mentioned earlier though, PGE is unique among its peers as the peer
20 group has been compiled by Staff for purposes of determining an appropriate
21 ROE. None of PGE's like-regulated electric peer utilities has filed three
22 consecutive general rate cases in the last five years. PGE has also

1 successfully managed these recent cases to reduce regulatory lag for its
2 capital additions, further reducing its risk compared to its peers.

3 **Q. Along with methods to recognize costs as new generation goes into**
4 **service, how do PGE's frequent filings impact ratepayer perception**
5 **regarding PGE's risks and attractiveness of investment opportunity?**

6 A. Prompt cost recovery and regulatory certainty has allowed PGE to depict
7 expansion of its generation capabilities as a solid positive for investors. As an
8 example of this see Exhibit 208.

9 **Q. What do these rough alternative modeling methods, which are regularly**
10 **used by investors for ballpark calculations, indicate?**

11 A. Investors applying the simple constant-growth DCF formula see a
12 recommendation of the top end of Staff's range of reasonable ROEs.
13 Investors applying Ibbotson equity premium thinking or traditional CAPM
14 modeling see a recommendation for the lower end of Staff's range of
15 reasonable ROEs.

16 **Q. How could investors check the reasonableness of modeling results.**

17 A. Without consideration of below average risk due to multiple-year consecutive
18 rate cases, investors applying the full spectrum of supported growth rates
19 from a composite (relying on historical experience and federal projections) to
20 most optimistic Top 10 Blue Chip from PGE's last general rate case in Staff's
21 three-stage DCF models would see results of 8.27 percent to 9.57 percent.
22 Finding Mid-Cap results best fit PGE's prospects, investors could narrow
23 expectations to Staff's 8.75 percent to 9.57 percent reasonable range of

1 ROEs with a recommended midpoint of 9.16 percent. Table 7 below
2 summarizes Staff's modeling results.

3 **Table 7**
4 **Results of Staff's Modeling**
5 **(See Exhibit Staff/203 for more detail)**

Range of Reasonable ROEs	8.75%	to	9.57%
<small>(Best fit is Staff screened electric utilities that have similar mid-cap capitalization size like PGE)</small>			
Midpoint of Mid-Cap Modeling Results	9.16%		
<small>(Staff's informed judgment excludes some of the lower range of modeling results depicted above)</small>			

7 **Table 8**
8 **Check for Reasonableness of Staff's Point ROE**

Check of Reasonableness:			
Last Commission Authorized ROE:		9.68%	
Modeled Change in Long-Term GDP Growth		9.37%	(less 31 bps)
Reduction in risk from frequent rate cases, and prompt cost recovery for new facilities.	9.00%	to	9.37%
Staff Point ROE Recommendation:		9.16%	

9
10 **Q. Referring to Table 8, please explain why a 9.16 percent midpoint is a**
11 **reasonable point ROE?**

12 **A.** The Commission's authorized ROE in PGE's last general rate case is a sound
13 starting point for a mental check of reasonableness of Staff
14 recommendations. The first adjustment to the last general rate case results is
15 to reduce the cost of equity for changes in growth expectations. The lowering
16 of growth expectations reduces the cost of equity by 31 basis points yielding
17 an ROE of 9.37 percent. The next adjustment is to reflect the reduction in risk
18 associated with frequent general rate case filing. PGE's very frequent rate
19 cases and tracking mechanisms for prompt cost recovery of new facilities in
20 my reasoned judgement merit a further drop of up to 37 basis points. This

1 provides a range of 9.37 to 9.00 percent. The value of 9.16 percent falls
2 solidly within that check of reasonable ROEs.

3 **Q. What is the impact on investor expectations to the upper cap on**
4 **reasonable ROEs of 9.57 percent were investors to rely on current April**
5 **2015 projections of long term GDP growth and remove consideration of**
6 **PGE's last rate case Top-Ten Blue Chip optimistic growth?**

7 A. In that case, Staff's upper limit of a range of reasonable ROEs would be 9.26
8 percent.

9 **EQUITY FORWARD**

10 **Q. Has Staff carefully analyzed PGE's equity forward?**

11 A. Yes. Staff has reviewed the confidential cost profile of the Company's equity
12 forward against alternatives that PGE considered.

13 **Q. Has Staff formed any general conclusions regarding equity forwards as**
14 **a result of this analysis?**

15 A. No. Each equity forward requires careful consideration prior to execution. In
16 PGE's specific context, in this instance, the equity forward 1) assured
17 Company, investors and ratepayers of certainty in the range of generated
18 proceeds; 2) delayed the impact of draw down on funds until cash was
19 needed for utility purposes; 3) added flexibility to offset the Company's
20 temporary inability to issue First Mortgage Bonds (FMB);²⁹ and 4) was
21 appropriate to the unique market conditions at time of issuance.

²⁹ Three forced outages put temporary pressure on PGE cash flows and interest coverage ratios.

1 **Q. What current cash flows are associated with the Equity Forward Sale**
2 **Agreement (EFSA) that PGE entered into on June 11, 2013 for**
3 **11,100,000 shares of the Company's Common Stock?**

4 A. On June 10, 2015, PGE physically settled in full the EFSA, with the issuance
5 of the remaining 10,400,000 shares of common stock available under the
6 agreement, in exchange for net proceeds of \$271 million.³⁰

7 **Q. Staff recommends the Commission continue to find PGE's equity**
8 **forward prudent in the current instance, but in no way precedent**
9 **setting?**

10 A. Yes. PGE's positive current equity forward arrangement and execution to
11 date afforded high certainty at controlled cost and risk, particularly when
12 bolstered by Commission flexibility with regard to 2014-2015 debt issuances,
13 within current market conditions. However, future conditions will vary.

14 **ADJUSTMENT OF MODELING RESULTS**

15 **Q. What sets PGE apart from the risks of its own proxy group as**
16 **assembled by Staff?**

17 A. PGE has filed three rate cases in past three years. Given the Company's
18 relatively low growth rate, capacity to file a rate case each year, and less
19 need to plan for long term, PGE has become less risky than its peer utilities.
20 The Maryland commission finds that similar factors reduce risk and regulatory

³⁰ PGE filed a Form-8 Current Report with the U.S. Securities and Exchange Commission (SEC) on June 10, 2015, making this detail of the EFSA public information.

1 lag in the current environment, meriting a lower point ROE from within a
2 reasonable range of ROEs.³¹

3 In addition, as indicated in PGE's filing, the Company will add a new gas-
4 fired plant, Carty, to its fleet in the May to June 2016 time period. The
5 Commission has allowed trackers to add new generation plant to rate base in
6 other dockets, and may allow similar regulatory treatment for Carty. PGE is
7 therefore not subject to much regulatory lag and is demonstrating better
8 ability to manage risk than the Company's peers.

9 **Q. Does any other party detect a pattern of rate case filings inclusive of the**
10 **treatment of new generation and transmission facilities creating a**
11 **reduction in risk for PGE?**

12 A. The Citizen's Utility Board of Oregon (CUB) states in opening power cost
13 testimony that "PGE's rate case is designed in a way as to minimize the risk
14 that the Company might suffer regulatory lag on the fixed cost recovery. At
15 the same time, it creates a lag in recognizing the (*Net Variable Power Costs*)
16 NVPC benefits of the plant. This means that while shareholders will get full
17 recovery of their capital investment, customers will not fully benefit from the
18 offset from reduced NVPC."³²

³¹ See Public Service Commission of Maryland, Order No. 85374, Case No. 9299, at 78 – February 22, 2013, accessible at:
http://webapp.psc.state.md.us/Intranet/Casenum/CaseForm_new.cfm

³² See UE 294 CUB/100 Jenks-McGovern/2 at lines 10-13.

1 **Q. In Order No. 09-020, the Commission concluded that the adoption of**
2 **decoupling justified a ROE reduction of 10 bps for PGE. Does Staff**
3 **recommend a similar outboard reduction in ROE for PGE now?**

4 A. No. Staff recommends the Commission consider a lower than top ROE from
5 within the range of reasonable ROEs in Staff's modeling reflective of the
6 lower risk profile PGE has achieved by effectively managing regulatory lag.

7 **Q. Is Staff opposed to regulatory certainty for PGE?**

8 A. No. Staff merely notes that PGE has successfully managed regulatory risk
9 and conveyed that story well to Moody's.

10 **HAMADA EQUATION**

11 **Q. Staff Application of the Hamada Equation to un-lever peer utility capital**
12 **structures and to re-Lever at PGE'S target capital structure increases**
13 **required ROE by 7 bps. Why is this adjustment reasonable?**

14 A. Staff usually employs the Hamada Equation as a check on the
15 reasonableness of Staff Modeling. As earlier discussed, Staff's screening
16 criteria already identify peers that have very close capital structure to PGE's.
17 Use of the Hamada adjusted results helps insure that Staff has captured all
18 material risk in its analysis.

19 **Q. Does Staff agree with PGE's Use of the Hamada Equation?**

20 A. No. Staff observes that PGE researched the academic origins of the Hamada
21 Equation. However, PGE appears to pursue historical capital structure inputs
22 in lieu of forward readily accessible Value Line projections Staff's applies the
23 higher of results from VL current and VL projected future Hamada inputs.

1 There are numerous variants in the use of the Hamada equation. Staff
2 methods are straightforward and consistent with an investor checking their
3 work prior to executing investment decisions.

4 **Q. In addition to 65 standard data requests and 19 multiple-part follow up**
5 **data requests; did Staff also rely on information from any other party in**
6 **Staff's analysis?**

7 A. Yes. Staff also noted CUB's shared perception of PGE's effective
8 management of risk and minimization of regulatory lag in cost recovery.³³

9 **INFORMED STAFF ANALYSIS**

10 **Q. Did Staff take into account information from other models?**

11 A. Yes. Staff performed a constant-growth DCF model analysis using the
12 Company's inputs and methods and performed a rough equity risk premium
13 analysis relying on an approach discussed by Professor Roger Ibbotson of the
14 Yale School of Management in *Rethinking the Equity Risk Premium*.³⁴ Staff
15 also showed how CAPM as typically calculated suggests Staff's three-stage
16 DCF modeling is reasonable and well considered.

17 **Q. Does Staff monitor and analyze current and projected market**
18 **conditions?**

19 A. Yes. Staff's analysis includes analysis of the current economic climate and its
20 impact on Staff's estimates of long-term growth. Staff also relies heavily on
21 feeds from SNL Financial LC, Bloomberg, Moody's, S&P, WSJ and other

³³ CUB/100, Jenks-McGovern/3, lines 9-13.

³⁴ Staff/200, Muldoon/24-25.

1 sources to make sure that its financial understandings are reflective of investor
2 expectations.

3 **Q. Did Staff develop its recommendations while informed by authorized**
4 **ROEs in other parts of the country?**

5 A. Yes. Staff examined recently authorized ROEs across the nation.

6 **Q. Did Staff use robust and proven analytical methodologies?**

7 A. Yes. Staff methods are similar to Staff's work over the last decade. The
8 difference in this rate case is that Staff has shown a spotlight on CAPM and will
9 continue to illuminate other methods used by the Company in this rate case.
10 This scrutiny will afford the Commission a chance to see the divergent paths
11 that PGE and Staff used in deploying both methods the Commission has relied
12 heavily on and methods that have proven worthy of less weight in the past.

13 **Q. Briefly recap changes since the last PGE general rate case in estimates**
14 **of long-term growth in gross domestic product (GDP).**

15 A. From 2008 through PGE's last general rate case, referent economists,
16 government agencies, university business schools, and business leaders
17 expressed at least some expectation on average that American worker
18 populations, productivity and aggregate output would return to pre-recession
19 trends. Over the last year the broad consensus picked up dramatically in long-
20 term GDP projections was that America has challenging fundamental problems
21 in sustaining historic GPD growth.

22 **Q. As the growth rate is pivotal in this case, please describe what long-**
23 **term growth rates Staff relied on.**

1 A. The lowest estimate of long-term GDP growth, 4.71 percent, is a weighted
2 average of historic GDP and forecasts from three federal sources. Fifty-
3 percent weight is applied to the aggregate estimates of long-term GDP by the
4 EIA, the OMB, and the CBO, with each federal source receiving one-third of
5 the 50 percent weight. The remaining 50 percent is the average annual
6 historical real GDP growth rate, established with a regression analysis, for the
7 period 1980 through 2014, to which Staff applied the TIPs inflation forecast.

8 **Q. What is Staff's second growth rate?**

9 A. Staff's second long-term growth rate of 4.80 percent, is PGE's Blue Chip and
10 OMB rate, which is higher than the Blue Chip average 2021-2025 rate of
11 4.40%. Staff presumes that PGE's input is drawing on Blue Chip expectations
12 prior to 2020 based on this value.

13 **Q. What is Staff's third growth rate?**

14 A. Staff's third growth rate, 5.08 percent, is the current Indiana / Blue Chip Top 10
15 growth projection through 2019. This reflects the growth that 9 of 10 referent
16 and informed current Blue Chip survey responders would find higher than they
17 could support. It also matches the modeling input cited by Indiana University's
18 Kelley School of Business. This value may be seen as the highest current
19 expectation of forward GDP rates for financial modeling purposes.

20 **Q. Does Staff's analysis and recommendation ignore the highest one in**
21 **ten super optimistic forecasters of GDP Growth as of PGE's last**
22 **general rate case?**

1 A. No. Staff's fourth and highest growth rate, 5.78 percent, is the Indiana Blue
2 Chip Top 10 growth projection from the last PGE general rate case. However,
3 Staff clarifies that this high growth is provided so that the Commission can
4 consider the dramatic change in national expectations for long-term growth in
5 context.

6 **Q. How are the four growth rates used in Staff's analysis?**

7 A. Using the cohort of proxy companies that met Staff's screens, Staff ran each of
8 its two DCF models four times, each time using a different long-term growth
9 rate.

10 **Q. How did Staff evaluate the Company's peer cohort and test for the**
11 **impact of company size on its modeling results?**

12 A. After performing these initial eight runs, Staff performed sensitivity analysis.

13 **Q. Please describe this process.**

14 A. First, Staff re-ran each model four times, again using the conservative, mid-
15 range, and optimistic long-term growth rates for the terminal growth stage as
16 described above, as well as the Top-10 Blue Chip growth from the last general
17 rate case.

18 **Q. What was the next step?**

19 A. Next, Staff ran each of its models imposing a mid-capitalization (Mid-Cap) size
20 screen between two and ten billion capitalization to refine the cohort to utilities
21 with comparable capitalization to PGE.

22 **Q. How did Staff test the impact of PGE's peer company selection?**

1 A. Finally, Staff ran each of its models using PGE's cohort of 27 proxy companies,
2 again using the four different long-term growth rates for the third stage of
3 growth that are discussed above.

4 **Q. How did Staff adjust for capital structures divergent to PGE's?**

5 A. Staff used the Hamada equation to de-lever or remove debt from the proxy
6 companies and then to re-lever or add debt to match PGE's 50 percent equity
7 target capital structure in this rate case.

8 **Q. What other adjustment does Staff make in this case?**

9 A. Staff makes an upward adjustment of 12.5 basis points to account for the cost
10 of PGE's equity flotation inclusive of a portion of interest carrying cost for an
11 equity forward provision.

12 **Q. Does Staff's range of reasonable ROEs encompass the entirety of
13 these modeling results including the results for each peer group and
14 sensitivity examined?**

15 A. Yes. The lower end of Staff's range of reasonable ROEs is most impacted by
16 Staff's composite growth rate, which is informed by federal forecasts of GDP
17 growth as compared to like projections from the same agencies a year ago.

18 **Q. Is the upper end of Staff's range of reasonable ROEs driven by results
19 from the Company's peer group utilizing the top growth rate?**

20 A. Interestingly no. Staff's Mid-Cap sensitivity generated higher required ROE
21 results than did the Company's peer group. Staff's upper range of reasonable
22 ROEs is from the Mid-Cap sensitivity peer group utilizing the highest growth
23 rate adjusted for divergent capital structure from PGE's.

1 **Q. To clarify, Staff's recommendation includes results from the**
2 **Company's peer group, but because the Company's peer group did not**
3 **produce the highest modeling results, Staff's range of reasonable**
4 **ROEs brackets the results for the Company's peer group?**

5 A. Yes. Were Staff to rely on the Company's peer group and remove Staff's Mid-
6 Cap sensitivity peer set, Staff's upper limit in its range of recommended ROEs
7 would be lower.

8 **UPDATES TO PGE MODELS**

9 **Q. Currently Staff has the freshest data in its modeling along with more**
10 **current long-term projections. Should the Commission see dated**
11 **inputs as technical deficiencies?**

12 A. No, with each successive round of testimony, the Commission sees updates to
13 inputs refreshing modeling.

14 **Q. What difference does reasonable expectation of appeal make to Staff's**
15 **testimony on Cost of Capital?**

16 A. Staff has endeavored to provide complete working models and self-contained
17 explanations and background materials. This level of introduction may appear
18 a bit extensive for the third general rate case in three years, but this testimony
19 may also need to inform persons who have not experienced the prior two rate
20 cases.

21 **Q. Does Staff's screening eliminate companies that are not like PGE?**

22 A. Yes. The point of screening is to identify a small group of companies with very
23 similar characteristics to PGE that can act as a close proxy for PGE. By

1 modeling and examining the proxy group, investors may project information not
2 directly observable from PGE. As the peer group grows, information is diluted
3 by information from Companies that no longer resemble PGE closely.

4 **ISSUE 3 – COST OF LT DEBT**

5 **Q. Has Staff compiled a summary table illustrating its calculation of**
6 **PGE’s cost of long-term debt?**

7 A. Yes, please see Staff Exhibit 207.

8 **Q. Is this table updated to reflect PGE’s May debt issuance?**

9 A. Yes, The 6.80 percent, \$67 million, 7-year series maturing Jan. 2016 was
10 earlier replaced by a like maturity pro forma series in 2016. However, the
11 updated table's capture of PGE’s issuance of replacement debt this May also
12 removes Staff’s earlier projected pro forma series.

13 **Q. Is this LT Debt table also updated to address PGE’s planned revisions**
14 **to its 2015 LT Debt issuances provided Staff on June 2, 2015?**

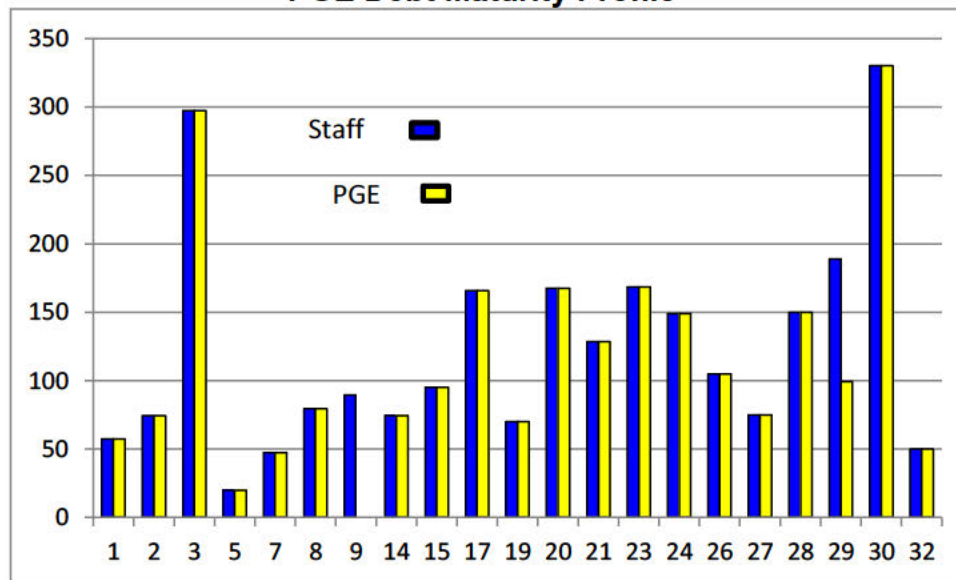
15 A. Yes. However Staff believes that the actual mix of long term debt maturities
16 may vary as provided in Confidential Staff Exhibit 207. Staff’s table avoids
17 some of the pressure created by debt maturing thirty years from the test year,
18 while creating no challenging pressure ten years from the test year.

19 **Q. How does Staff recommend the Commission address planned 2015**
20 **bond issuances and 2016 debt in general?**

21 A. Staff recommends the Commission take a measured approach. PGE faces
22 two challenges in its debt maturity profile as the rate case was filed. The actual
23 May 2015 issuance, in lieu of the 2016 debt issuance planned when the rate

1 case was filled, mitigates some of the 3- and 30-year maturity concentration to
2 that shown below in Figure 7.

3 **Figure 7**
4 **PGE Debt Maturity Profile**



5
6 **Q. Does Staff recommend the Commission update the cost of long-term**
7 **debt to reflect actual 2015 issuances arranged prior to November**
8 **2015?**

9 A. Yes, it is reasonable for the Commission to accept actual values provided the
10 Commission by this November. The Commission has long precedent of
11 incorporating best available facts. Further, arrangement by the end of this
12 summer has the potential to capture historically low coupon rates in advance of
13 any interest rate "liftoff" decision by the Fed.

14 Staff notes that PGE does not project any debt issuances in 2016. Staff
15 does not have a recommendation at this time as to how to handle the case
16 where PGE issues LT Debt in 2016.

17 **Q. Why does Staff recommend this substantial flexibility for PGE?**

1 A. The flexibility recommended will permit PGE to prudently act to best finance
2 necessary utility activity at least cost and controlled risk in the context of this
3 general rate case. While no person can perfectly time markets, PGE is
4 operating in a near-term debt market with short convective patterns on UST
5 yields that later this year may be affected by either press releases or actions by
6 the Fed.

7 **Q. To review, does Staff recommend 5.235 percent cost of LT Debt for**
8 **PGE, with the expectation that this position may be updated with**
9 **actual information from 2015 issuances prior to the Commission's**
10 **decision date on this matter?**

11 A. Yes.

12 **ISSUE 4 – AFUDC**

13 **Q. Has Staff reviewed PGE calculations and unique methods for recording**
14 **the Allowance for Funds Used during Construction (AFUDC)?**

15 A. Yes, Staff also held a workshop with the Company and issued follow up data
16 requests to better understand PGE's processes and to verify that each
17 difference in PGE methodology from default practice was fully authorized.

18 **Q. Does Staff summarize its review of PGE AFUDC in this testimony?**

19 A. No, Staff will lay out its findings in reply testimony in this rate case as Staff
20 analysis is not yet complete.

21 **Q. Does Staff recommend an adjustment to AFUDC?**

22 A. No, but, a concise report on Staff's investigation into this topic will memorialize
23 findings to the benefit of future auditors and investigators.

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CONCLUSION

Q. What is Staff's recommendation regarding ROE?

A. Staff recommends that the Commission consider a range of reasonable ROEs from 8.75 percent to 9.57 percent, and a point ROE of 9.16 percent. This is the midpoint in Staff's range of reasonable ROEs. Please note that Staff's recommendation still reflects and is inclusive of the Top-10 Blue Chip most optimistic growth rate from PGE's last general rate case.

Q. How do you conclude your testimony?

A. It is not remarkable that PGE looks like a well-run utility to Value Line with average risk on dimensions that matter to investors. A solid utility that plans ahead and proactively controls risks meets the needs of risk-averse ratepayers. This stability and management strength also makes PGE common stock attractive to institutional and conservative investors who rely on stable growing dividends to meet their obligations in turn.

Q. Why do you recommend the Commission consider a lower point ROE than the uppermost ROE resultant from Staff's modeling?

A: There are two key reasons: First, this is PGE's third consecutive annual general rate case, complete with methods for rapid cost recovery of new generation. PGE's management has controlled risk and regulatory lag well. This success is making PGE less risky than its peers, as compiled by Staff, none of whom have filed rate cases with this frequency in the last five years.

Q. What is the second reason?

1 A: Since PGE's last general rate case, there has developed a broad consensus
2 that US GDP will not return to pre-recession trends. Rather than directly
3 shifting required ROE downward by 31 basis points, Staff recommends the
4 Commission continue to consider the cliff edge and take this information
5 under advisement in selecting a point ROE.

6 **Q. Do you have any criticism of PGE in this rate case?**

7 A: No. Staff merely points out that PGE needs consistent messaging in all
8 arenas that the Company is skillfully managing risk, controlling cost, and
9 expediting cost recovery within a supportive regulatory environment. Success
10 in that repeated communication offers the potential of a rating upgrade by
11 S&P. Achieving that S&P rating upgrade unlocks PGE's still higher Moody's
12 rating to lower financing and credit costs.

13 **Q. Do you expect a lower authorized ROE to hurt PGE's credit profile?**

14 A: No. Moody's Investors Service on March 1, 2015 examined this subject in its
15 publication, "Lower Authorized Equity Returns Will Not Hurt Near-Term Credit
16 Profiles."

17 **Q. What are the key drivers underlying Moody's findings?**

18 A: Moody's review, provided as Exhibit Staff/210, noted three key factors:
19 1. More Timely Cost Recovery Helps Offset Falling ROEs;
20 2. Utilities' Cash Flow is Somewhat Insulated from Lower ROEs; and
21 3. Utilities' Actual Financial Performance Remains Stable.

22 **Q. Does that conclude your opening testimony?**

23 A: Yes.

CASE: UE 294
WITNESS: MATT MULDOON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 201

Witness Qualification Statement

June 15, 2015

WITNESS QUALIFICATION STATEMENT

NAME: Matthew J. Muldoon

EMPLOYER: PUBLIC UTILITY COMMISSION OF OREGON

TITLE: Senior Economist
Utility Program
Energy – Rates Finance and Audit Division

ADDRESS: 3930 Fairview Industrial Dr. SE
Salem, OR 97302-1166.

EDUCATION: In 1981, I received a Bachelors of Arts Degree in Political Science from the University of Chicago. In 2007, I received a Masters of Business Administration from Portland State University with a certificate in Finance.

EXPERIENCE: From April of 2008 to the present, I have been employed by the OPUC. My current responsibilities include financial and rate analysis with an emphasis on cost of capital.

From 2002 to 2008 I was Executive Director of the Acceleration Transportation Rate Bureau, Inc. where I developed new rate structures for surface transportation and created metrics to insure program success within regulated processes.

I was the Vice President of Operations for Willamette Traffic Bureau, Inc. from 1993 to 2002. There I managed tariff rate compilation and analysis. I also developed new information systems and did sensitivity analysis for rate modeling.

OTHER: I have prepared, and defended formal testimony in contested hearings before the OPUC, ICC, STB, WUTC and ODOT. I have also prepared OPUC Staff testimony in BPA rate cases.

CASE: UE 294
WITNESS: MATT MULDOON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 202

Staff Peer Screening

**Exhibits in Support
of Opening Testimony**

June 15, 2015

Electric Utilities Screened by Staff and PGE

		Small Cap Under 2 Billion								<u>Staff Peer Screening</u>
		Mid Cap 2 Billion to 10 Billion								1 Continuity Screen
		Large Cap Over 10 Billion								2 Sensitivity Mid Cap
										3 PGE Peer Group
#	Abbreviated Utility	UE 294 PGE	UE 283 PGE	UE 262 PGE	UE 215 PGE	UE 294 Staff	UE 283 Staff	UE 262 Staff	UE 215 Staff	VL Corporate Name Electric Utility
1	AEP	Yes	No	No	Yes	Yes	Yes	Yes	Yes	American Electric Power Company, Inc.
2	Allele	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Allele, Inc.
3	Alliant	Yes	Yes	Yes	Yes	No	No	No	No	Alliant Energy Corporation
4	Ameren	Yes	No	No	Yes	No	No	No	No	Ameren Corporation
5	Avista	No	Yes	Yes	Yes	No	No	Yes	No	Avista Corporation
6	Black Hills	No	Yes	Yes	No	No	No	No	No	Black Hills Corporation
7	CenterPoint	Yes	No	No	No	No	No	No	No	CenterPoint Energy, Inc.
8	CH Energy	No	No	No	No	No	No	No	No	CH Energy Group, Inc.
9	Cleco	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Cleco Corporation
10	CMS	Yes	Yes	Yes	Yes	No	No	No	No	CMS Energy Corporation
11	Consol Ed	Yes	No	No	No	No	No	No	No	Consolidated Edison, Inc.
12	Dominion	Yes	No	No	No	No	No	No	No	Dominion Resources, Inc.
13	DTE	Yes	No	No	Yes	Yes	Yes	Yes	No	DTE Energy Company
14	Duke	No	No	No	Yes	No	No	No	No	Duke Energy Corporation
15	Edison Int'l	Yes	No	No	Yes	Yes	Yes	Yes	No	Edison International
16	El Paso	Yes	No	No	No	No	No	No	No	El Paso Electric Company
17	Empire	No	No	Yes	Yes	No	No	No	Yes	Empire District Electric Company
18	Entergy	Yes	No	No	Yes	No	No	No	No	Entergy Corporation
19	Exelon	No	No	No	No	No	No	No	No	Exelon Corporation
20	First Energy	No	No	No	Yes	No	No	No	No	FirstEnergy Corporation (Formerly in part: Allegheny)
21	Great Plains	Yes	Yes	No	Yes	Yes	No	No	No	Great Plains Energy Incorporated
22	Hawaiian	No	Yes	Yes	Yes	No	No	No	No	Hawaiian Electric Industries, Inc.
23	IDACORP	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	IDACORP, Inc.
24	Integritys	No	No	No	No	No	No	No	No	Integritys Energy Group, Inc.
25	ITC	No	No	No	No	No	No	No	No	ITC Holdings Corp.
26	MGE	Yes	Yes	Yes	Yes	No	No	No	No	MGE Energy, Inc.
27	NE Utilities	No	No	No	No	No	No	No	No	Northeast Utilities
28	NextEra	No	No	No	Yes	No	No	No	No	NextEra Energy, Inc. (Formerly: FPL Group, Inc.)
29	NorthWestern	No	Yes	Yes	Yes	No	No	Yes	No	NorthWestern Corporation
30	NV Energy	No	No	Yes	No	No	No	No	No	NV Energy Inc.
31	OGE	Yes	Yes	Yes	Yes	No	No	No	No	OGE Energy Corporation
32	Otter Tail	Yes	No	No	No	Yes	No	No	No	Otter Tail Corporation
33	Pepco	No	No	No	No	No	No	No	No	Pepco Holdings, Inc.
34	PG&E	Yes	No	No	Yes	Yes	Yes	Yes	Yes	PG&E Corporation
35	PGE	Yes	Yes	Yes	Yes	No	No	No	No	Portland General Electric Company
36	Pinnacle	Yes	Yes	Yes	Yes	No	No	No	Yes	Pinnacle West Capital Corporation
37	PNM	No	Yes	No	No	Yes	No	No	No	PNM Resources, Inc.
38	PPL	No	No	No	No	No	No	No	No	PPL Corporation
39	Public Serv.	Yes	No	No	No	No	No	No	No	Public Serv. Enterprise Group, Inc.
40	SCANA	Yes	Yes	Yes	No	No	No	No	No	SCANA Corporation
41	Sempra	Yes	No	No	No	No	No	No	No	Sempra Energy
42	Southern	Yes	No	No	Yes	No	No	No	No	Southern Company, The
43	TECO	No	Yes	Yes	Yes	No	No	Yes	Yes	TECO Energy, Inc.
44	UIL	No	No	No	No	No	No	No	Yes	UIL Holdings Corporation
45	UNS	No	Yes	Yes	Yes	No	No	No	No	UNS Energy Corporation (Formerly: UniSource)
46	Vectren	Yes	No	No	No	No	No	No	No	Vectren Corporation
47	Westar	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Westar Energy, Inc.
48	Wisconsin	No	Yes	Yes	Yes	No	No	No	Yes	Wisconsin Energy Corporation
49	Xcel	Yes	No	No	Yes	No	No	No	Yes	Xcel Energy, Inc.
	No. of Peers:	27	20	20	31	9	8	10	13	
						3	Small Cap Sensitivity			

Staff Peer Screen

#	Abbreviated Utility	UE 294 PGE	UE 294 Staff	VL	Yahoo Fin.	Yahoo Fin.	Covered by	2/25/2015	S&P	Credit	EEl	VL	VL	No M&A Detected
				2/10/2015	2/10/2015	Mkt Cap \$ Billions	Value Line	No Div	Local LT	Rating	BB+	80%	LT Debt	
				Beta	Beta		(VL)	5 years	Debt Rating	to BBB+	Regulated Assets	45% - 55% of Capital	5 Yr Rate > 0%	In Last 5 Years
1	AEP	Yes	Yes	0.70	0.50	29.00	Yes	Pass	BBB	Pass	80% +	53%	Yes	Nov 1999 Merged w CSR, May 2011 Float
2	Allite	Yes	No	0.80	1.00	2.37	Yes	Pass	BBB+	Pass	80% +	46%	Yes	Feb, 2015 1st Water Purchase \$168M = U.S. Water Services Inc Δstrategy
3	Alliant	Yes	No	0.80	0.57	7.33	Yes	Pass	A-	Fail	80% +	48%	Yes	Selling MN Electric & N Gas Dist to Coop Group Announced Apr. 17, 2014 SNL
4	Ameren	Yes	No	0.75	0.61	10.52	Yes	Pass	BBB+	Pass	80% +	46%	Yes	Mar 2013,\$900M Sale of Merch. Gen. (5 Power Plants) to Dynergy / SNL
5	Avista	No	No	0.80	0.74	2.20	Yes	Pass	BBB	Pass	80% +	49%	Yes	M&A - Purchase of AERC Completed 2014 after Sale of Ecova Completed
6	Black Hills	No	No	0.90	1.10	2.26	Yes	Pass	BBB	Pass	80% +	52%	Yes	Black Hills to buy MGTC transmission & distribution utility assets / SNL 2014
7	CenterPoint	Yes	No	0.75	0.63	9.74	Yes	Pass	A-	Fail	50% to 80%	52%	Yes	CenterPoint Unlikely to Acquire Cleco / SNL 2014
8	CH Energy	No	No	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Feb 2012 Bought by Fortis
9	Cleco	No	No	0.80	0.54	3.26	Yes	Pass	BBB+	Pass	80% +	43%	Yes	CenterPoint Unlikely to Acquire Cleco / SNL 2014
10	CMS	Yes	No	0.70	0.14	9.97	Yes	Pass	BBB	Pass	80% +	68%	Yes	No M&A
11	Consol Ed	Yes	No	0.60	0.22	19.62	Yes	Pass	A-	Fail	80% +	48%	Yes	No M&A
12	Dominion	Yes	No	0.70	0.34	44.76	Yes	Pass	A-	Fail	50% to 80%	63%	Yes	No M&A
13	DTE	Yes	Yes	0.75	0.35	15.35	Yes	Pass	BBB+	Pass	80% +	51%	Yes	Mar 2001 Merged w MCN
14	Duke	No	N	0.60	0.27	59.54	Yes	Pass	BBB+	Pass	80% +	51%	Yes	Jan 2011 Bought Progress Energy
15	Edison Int'l	Yes	Yes	0.75	0.45	21.50	Yes	Pass	BBB-	Pass	80% +	45%	Yes	Aug 2000 Bought Citizens Power
16	EI Paso	Yes	No	0.70	0.63	1.57	Yes ***	Fail	BBB	Pass	80% +	56%	Yes	No M&A
17	Empire	No	No	0.70	0.63	1.14	Yes	Fail	BBB	Pass	80% +	51%	Yes	No M&A
18	Entergy	Yes	No	0.70	0.41	14.67	Yes	Pass	BBB	Pass	80% +	58%	Yes	Mar 2013 Merger w FPL Group, Dec 2011 Sold Trans. to ITC
19	Exelon	No	No	0.70	0.46	30.08	Yes	Fail	BBB	Pass	50% to 80%	44%	Yes	Exelon Purchase of Pepco Announced May 7, 2014 \$6.83 Billion SNL
20	First Energy	No	No	0.70	0.33	16.25	Yes	Fail	BBB-	Pass	50% to 80%	56%	No	No M&A
21	Great Plains	Yes	Yes	0.85	0.79	4.32	Yes	Pass	BBB+	Pass	80% +	49%	Yes	No M&A
22	Hawaiian	No	No	0.80	0.22	3.47	Yes	Pass	BBB-	Pass	Under 50%	47%	Yes	Proposed Sale of HECO to Next Era for \$4.3B / SNL Feb. 2, 2015
23	IDACORP	Yes	Yes	0.80	0.91	3.22	Yes	Pass	BBB	Pass	80% +	48%	Yes	No M&A
24	Integrus	No	N	0.80	0.59	6.27	Yes	Pass	A-	Fail	80% +	47%	No	Wisconsin Energy to Buy Integrus Energy Group
25	ITC	No	No	0.65	0.35	6.19	Yes	Pass	A-	Fail	N/A	68%	Yes	Dec 2011 Bought Entergy Transmission - BK Apr 2013 Voted Y
26	MGE	Yes	No	0.70	0.84	1.55	Yes	Pass	AA-	Fail	50% to 80%	39%	Yes	No M&A
27	NE Utilities	No	No	0.75	0.58	17.32	Yes	Pass	A-	Fail	80% +	46%	Yes	Oct 2010 Merged w Nstar
28	NextEra	No	No	0.70	0.36	47.66	Yes	Pass	A-	Fail	50% to 80%	53%	Yes	Proposed Sale of HECO to Next Era for \$4.3B / SNL Feb. 2, 2015
29	NorthWestern	No	No	0.70	0.64	2.18	Yes	Pass	BBB	Pass	80% +	50%	Yes	2014 Acquisition \$900M to buy 633 MW Hydro Capacity in MT
30	NV Energy	No	No	N/A	N/A	N/A	N/A	N/A	BBB+	Pass	N/A	N/A	N/A	Purchased in 2013 by MEH - Now BKE
31	OGE	Yes	No	0.90	0.68	6.73	Yes	Pass	A-	Fail	80% +	44%	Yes	No M&A
32	Otter Tail	Yes	Yes	0.90	1.12	1.15	Yes	Pass	BBB	Pass	80% +	49%	Yes	No M&A
33	Pepco	No	No	0.70	0.19	6.89	Yes	Pass	BBB+	Pass	80% +	48%	No	Exelon Purchase of Pepco Announced May 7, 2014 \$6.83 Billion SNL
34	PG&E	Yes	Yes	0.65	0.36	26.99	Yes	Pass	BBB	Pass	80% +	48%	Yes	July 1997 Purchased Valero Energy
35	PGE	Yes	No	0.80	0.70	2.95	Yes	Pass	BBB	Pass	80% +	45%	Yes	No M&A
36	Pinnacle	Yes	No	0.70	0.59	7.47	Yes	Pass	A-	Fail	80% +	46%	Yes	Pinnacle W's AZ Pub Service (APS) Buying \$182 M 4-Corners Coal Gen
37	PNM	No	Yes	0.85	0.69	2.35	Yes	Pass	BBB	Pass	80% +	52%	Yes	PNM 2001 Merger w Western Resources
38	PPL	No	No	0.60	0.54	23.50	Yes	Pass	BBB	Pass	50% to 80%	57%	Yes	No M&A
39	Public Serv.	Yes	No	0.75	0.50	20.72	Yes	Pass	BBB+	Pass	50% to 80%	42%	Yes	No M&A
40	SCANA	Yes	No	0.75	0.36	8.73	Yes	Pass	BBB+	Pass	50% to 80%	56%	Yes	SCANA Feb 2015 closed the \$150 million sale of SCANA Communications to Spirit
41	Sempra	Yes	No	0.75	0.36	27.17	Yes	Pass	BBB+	Pass	50% to 80%	51%	Yes	No M&A
42	Southern	Yes	No	0.55	0.22	44.25	Yes	Pass	A	Fail	80% +	56%	Yes	No M&A
43	TECO	No	No	0.85	0.68	4.88	Yes	Pass	BBB+	Pass	80% +	58%	Yes	TECO to Buy NM Gas for \$950 M per SNL, May 14, 2014
44	UIL	No	No	0.80	0.61	2.47	Yes	Pass	BBB	Pass	80% +	58%	No	UIL Called Off Deal to Acquire Philadelphia Gas Works for \$1.86B on Dec 4 / WSJ
45	UNS	No	No	0.75	N/A	N/A	Yes	Pass	N/A	Fail	80% +	63%	Yes	Fortis to Acquire UNS for \$4.3B in Q1 2015
46	Vectren	Yes	No	0.80	0.79	3.83	Yes	Pass	A-	Fail	50% to 80%	52%	Yes	No M&A
47	Westar	Yes	Yes	0.75	0.50	5.37	Yes	Pass	BBB+	Pass	80% +	51%	Yes	No M&A
48	Wisconsin	No	No	0.65	0.30	12.13	Yes	Pass	A-	Fail	80% +	50%	Yes	Buying Integrus for \$4.6B in Common Stock and \$1.5B Cash
49	Xcel	Yes	No	0.65	0.25	18.33	Yes	Pass	A-	Fail	80% +	54%	Yes	No M&A

CASE: UE 294
WITNESS: MATT MULDOON

**PUBLIC UTILITY COMMISSION
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OREGON**

STAFF EXHIBIT 203

Staff Three Stage DCF Modeling

**Exhibits in Support
of Opening Testimony**

June 15, 2015

Required ROE Results from Three Stage DCF Modeling

Model X: 3 Stage DCF - Dividend Growth with Terminal Value as Perpetuity (Hamada Adjusted)								
X	Composite Growth	4.71%	PGE BlueChip & OMB	4.80%	Top-10 LT Blue Chip Growth	5.08%	UE 283 Top-10 Growth	5.78%
Staff Peers	8.21%	Implied Average ROE	8.27%	Implied Average ROE	8.48%	Implied Average ROE	8.99%	Implied Average ROE
Sensitivity 1 Mid-Cap	8.62%		8.68%		8.88%		9.39%	
Sensitivity 2 Co. Peers	8.15%		8.21%		8.42%		8.93%	
Model Y: 3 Stage DCF - Dividend Growth with Terminal Value as Sales based upon EPS Growth and Terminal Stock Sale (Hamada Adjusted)								
Y	Composite Growth	4.71%	PGE BlueChip & OMB	4.80%	Top-10 LT Blue Chip Growth	5.08%	UE 283 Top-10 Growth	5.78%
Staff Peers	8.17%	Implied Average ROE	8.22%	Implied Average ROE	8.39%	Implied Average ROE	8.80%	Implied Average ROE
Sensitivity 1 Mid-Cap	8.81%		8.87%		9.03%		9.44%	
Sensitivity 2 Co. Peers	8.31%		8.36%		8.52%		8.93%	

Values Shown Above Are NOT Adjusted for Equity Flotation Costs

Staff Interpretation of ROE Modeling Results

Common Stock Flotation Costs Adjustment Shifts Range of Reasonable ROE's Upward by :				12.5	bps
Range of Reasonable ROEs	8.75%	to	9.57%		
(Best fit is Staff screened electric utilities that have similar mid-cap capitalization size like PGE)					
Midpoint of Mid-Cap Modeling Results			9.16%		
(Staff's informed judgment excludes some of the lower range of modeling results depicted above)					
<u>Check of Reasonableness:</u>					
Last Commission Authorized ROE:			9.68%		
Modeled Change in Long-Term GDP Growth			9.37%	(less 31 bps)	
Reduction in risk from frequent rate cases, and prompt cost recovery for new facilities.	9.00%	to	9.37%		
Staff Point ROE Recommendation:			9.16%		
* Staff Blue Chip Data is sourced from Table 1 Blue Chip Economic Forecast, Feb. 2015					

Note: Please see next pages for illustrations of Three Stage DCF calculations.
Staff work papers contain the spreadsheets for these models in larger print as well as sensitivities examined.

Continued from Prior Page

Average B.O.Y. & E.O.Y. Cash Flows						Model			Y	EPS Growth
1	2	3	4	5	6	7	8	9		
					Terminal	Average 2014 - 2019				
					Value as	Dividend Growth Rates				
#	Abbreviated Utility	PGE	Staff	Average IRR	% of NPV _{DIV}	EOY				
1	1	AEP	Yes	Yes	8.5%	56.1%	5.1%	5.1%	5.1%	
2	2	Alliate	Yes	No	8.8%	66.5%	4.0%	4.0%	4.0%	
3	3	Alliant	Yes	No	9.0%	51.4%	8.2%	8.2%	8.2%	
4	4	Ameren	Yes	No	8.5%	66.3%	2.9%	2.8%	2.9%	
5	7	CenterPoint	Yes	No	11.0%	42.2%	7.9%	8.1%	8.0%	
6	10	CMS	Yes	No	8.7%	67.2%	5.7%	5.8%	5.7%	
7	11	Consol. Ed.	Yes	No	7.8%	54.0%	2.1%	2.2%	2.2%	
8	12	Dominion	Yes	No	8.2%	63.5%	3.8%	4.0%	3.9%	
9	13	DTE	Yes	Yes	8.4%	61.2%	5.2%	5.3%	5.2%	
10	15	Edison Int'l	Yes	Yes	8.2%	52.4%	9.4%	9.7%	9.5%	
11	16	El Paso	Yes	No	7.6%	59.0%	4.8%	5.0%	4.9%	
12	18	Entergy	Yes	No	8.6%	54.0%	4.6%	4.1%	4.3%	
13	21	Great Plains	Yes	Yes	9.1%	59.5%	6.2%	6.2%	6.2%	
14	23	IDACORP	Yes	Yes	7.3%	51.9%	4.9%	5.5%	5.2%	
15	26	MGE	Yes	No	8.4%	89.6%	4.1%	4.1%	4.1%	
16	31	OGE	Yes	No	9.5%	53.2%	9.8%	10.0%	9.9%	
17	32	Otter Tail	Yes	Yes	8.9%	77.5%	1.9%	1.8%	1.8%	
18	34	PG&E	Yes	Yes	8.2%	69.0%	4.8%	4.4%	4.6%	
19	35	PGE	Yes	No	8.1%	63.0%	6.0%	5.8%	5.9%	
20	36	Pinnacle	Yes	No	8.4%	53.9%	4.6%	4.7%	4.7%	
21	37	PNM	No	Yes	10.4%	70.2%	12.5%	12.4%	12.4%	
22	39	Public Serv.	Yes	No	7.7%	68.7%	0.7%	0.9%	0.8%	
23	40	SCANA	Yes	No	8.0%	60.1%	2.8%	2.9%	2.9%	
24	41	Sempra	Yes	No	8.2%	84.6%	5.0%	5.1%	5.1%	
25	42	Southern	Yes	No	8.8%	49.7%	3.1%	3.2%	3.2%	
26	46	Vectren	Yes	No	9.2%	78.9%	4.3%	4.3%	4.3%	
27	47	Westar	Yes	Yes	8.4%	64.5%	3.5%	3.6%	3.5%	
28	49	Xcel	Yes	No	8.7%	63.3%	4.7%	4.9%	4.8%	
TOTALS		27	9							
			3							
					MEAN					
					8.39%	55.8%	12.4%	6.0%	6.0%	Staff
					8.96%	60.6%	7.9%	8.0%	7.9%	Staff (Mid Cap Sensitivity)
					8.52%	62.3%	4.8%	4.9%	4.9%	Staff (Co Peer Sensitivity)

CASE: UE 294
WITNESS: MATT MULDOON

**PUBLIC UTILITY COMMISSION
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STAFF EXHIBIT 204

Staff Synthetic Forward Curve TIPS Analysis

**Exhibits in Support
of Opening Testimony**

June 15, 2015

TIPs – Implied Average Annual Forward Inflation Rate

2024 through 2044 TIPs-Implied Average Annual Inflation Rate:											2.12%			
Yr. End Mo.-Yr.	Years	Individually Implied Price Levels					Implied Forward Curve/Price Level					Implied Price Level	Check	
		5-Yr	7-Yr	10-Yr	20-Yr	30-Yr	5-Yr	7-Yr	10-Yr	20-Yr	30-Yr			
Dec-14	0	100.00	100.00	100.00	100.00	100.00	100.00					100.00		
Dec-15	1	101.41	101.61	101.83	101.95	102.02	101.41					101.41		
Dec-16	2	102.85	103.25	103.70	103.93	104.09	102.85					102.85		
Dec-17	3	104.30	104.91	105.60	105.95	106.19	104.30					104.30		
Dec-18	4	105.77	106.60	107.54	108.02	108.34	105.77					105.77		
Dec-19	5	107.27	108.31	109.51	110.12	110.53	107.27					107.27		
Dec-20	6		110.06	111.52	112.26	112.77		109.53				109.53		
Dec-21	7		111.83	113.56	114.45	115.05		111.83				111.83		
Dec-22	8			115.64	116.68	117.38			114.46			114.46		
Dec-23	9			117.76	118.95	119.76			117.16			117.16		
Dec-24	10			119.92	121.26	122.18			119.92			119.92		
Dec-25	11				123.62	124.65				122.39		122.39	122.46	
Dec-26	12				126.03	127.17				124.91		124.91	125.06	
Dec-27	13				128.48	129.75				127.49		127.49	127.71	
Dec-28	14				130.99	132.37				130.11		130.11	130.41	
Dec-29	15				133.54	135.05				132.79		132.79	133.17	
Dec-30	16				136.13	137.78				135.53		135.53	136.00	
Dec-31	17				138.78	140.57				138.32		138.32	138.88	
Dec-32	18				141.49	143.41				141.17		141.17	141.82	
Dec-33	19				144.24	146.32				144.08		144.08	144.82	
Dec-34	20				147.05	149.28				147.05		147.05	147.89	
Dec-35	21					152.30					150.25	150.25	151.02	
Dec-36	22					155.38					153.52	153.52	154.22	
Dec-37	23					158.52					156.86	156.86	157.49	
Dec-38	24					161.73					160.28	160.28	160.83	
Dec-39	25					165.00					163.77	163.77	164.23	
Dec-40	26					168.34					167.33	167.33	167.71	
Dec-41	27					171.75					170.97	170.97	171.27	
Dec-42	28					175.22					174.69	174.69	174.89	
Dec-43	29					178.77					178.50	178.50	178.60	
Dec-44	30					182.38					182.38	182.38	182.38	

Quarterly Aggregation of H15 Data

Average Quarterly Values for FRB H15 Data

See FRB H.15 Tab for Data Feed Sources.

Staff TIPS Analysis

Quarterly Aggregation

Average Monthly Inflation Indexed Rates by Quarter					
Qtr	TIPS-05m	TIPS-07m	TIPS-10m	TIPS-20m	TIPS-30m
2003-Q1	1.33	1.81	2.07		
2003-Q2	1.15	1.61	1.94		
2003-Q3	1.36	1.84	2.21		
2003-Q4	1.24	1.65	2.01		
2004-Q1	0.82	1.26	1.71		
2004-Q2	1.26	1.69	2.05		
2004-Q3	1.17	1.55	1.89	2.28	
2004-Q4	0.93	1.30	1.69	2.08	
2005-Q1	1.17	1.41	1.71	1.93	
2005-Q2	1.30	1.44	1.68	1.83	
2005-Q3	1.59	1.70	1.82	1.98	
2005-Q4	1.92	1.98	2.04	2.13	
2006-Q1	2.00	2.05	2.09	2.08	
2006-Q2	2.34	2.39	2.46	2.48	
2006-Q3	2.37	2.37	2.37	2.38	
2006-Q4	2.40	2.36	2.32	2.29	
2007-Q1	2.28	2.33	2.33	2.36	
2007-Q2	2.35	2.40	2.44	2.49	
2007-Q3	2.38	2.44	2.45	2.46	
2007-Q4	1.54	1.81	1.92	2.11	
2008-Q1	0.58	1.02	1.32	1.81	
2008-Q2	0.79	1.17	1.48	2.03	
2008-Q3	1.18	1.47	1.70	2.16	
2008-Q4	2.73	2.92	2.60	2.73	
2009-Q1	1.37	1.54	1.79	2.34	
2009-Q2	1.12	1.37	1.72	2.31	
2009-Q3	1.17	1.41	1.74	2.22	
2009-Q4	0.58	0.94	1.37	1.98	
2010-Q1	0.47	0.94	1.43	2.00	2.16
2010-Q2	0.46	0.91	1.36	1.77	1.88
2010-Q3	0.20	0.57	1.06	1.68	1.76
2010-Q4	-0.11	0.28	0.75	1.48	1.65
2011-Q1	0.07	0.67	1.09	1.71	2.00
2011-Q2	-0.29	0.33	0.80	1.49	1.78
2011-Q3	-0.65	-0.22	0.28	0.95	1.25
2011-Q4	-0.75	-0.39	0.05	0.61	0.85
2012-Q1	-1.02	-0.60	-0.17	0.51	0.78
2012-Q2	-1.08	-0.75	-0.35	0.35	0.66
2012-Q3	-1.27	-1.01	-0.63	0.02	0.43
2012-Q4	-1.42	-1.15	-0.76	-0.02	0.36
2013-Q1	-1.40	-0.98	-0.59	0.19	0.56
2013-Q2	-1.04	-0.62	-0.25	0.47	0.80
2013-Q3	-0.32	0.17	0.56	1.16	1.43
2013-Q4	-0.29	0.25	0.57	1.19	1.50
2014-Q1	-0.16	0.37	0.58	1.11	1.39
2014-Q2	-0.25	0.27	0.43	0.88	1.44
2014-Q3	-0.13	0.24	0.32	0.72	0.98
2014-Q4	0.19	0.39	0.45	0.75	0.95

Average Monthly Nominal UST Rates by Quarter					
Qtr	UST-05m	UST-07m	UST-10m	UST-20m	UST-30m
2003-Q1	2.91	3.46	3.92	4.90	
2003-Q2	2.57	3.13	3.62	4.59	
2003-Q3	3.14	3.72	4.23	5.17	
2003-Q4	3.25	3.78	4.29	5.16	
2004-Q1	2.99	3.52	4.02	4.89	
2004-Q2	3.72	4.18	4.60	5.36	
2004-Q3	3.51	3.92	4.30	5.07	
2004-Q4	3.49	3.85	4.17	4.87	
2005-Q1	3.88	4.09	4.30	4.76	
2005-Q2	3.87	3.99	4.16	4.55	
2005-Q3	4.04	4.11	4.21	4.51	
2005-Q4	4.39	4.42	4.49	4.77	
2006-Q1	4.55	4.55	4.57	4.76	4.64
2006-Q2	4.99	5.02	5.07	5.29	5.14
2006-Q3	4.84	4.85	4.90	5.09	4.99
2006-Q4	4.60	4.60	4.63	4.83	4.74
2007-Q1	4.65	4.65	4.68	4.90	4.80
2007-Q2	4.76	4.79	4.85	5.07	4.99
2007-Q3	4.50	4.60	4.73	5.01	4.94
2007-Q4	3.79	3.98	4.26	4.65	4.61
2008-Q1	2.75	3.15	3.66	4.40	4.41
2008-Q2	3.16	3.46	3.89	4.59	4.58
2008-Q3	3.11	3.44	3.86	4.49	4.45
2008-Q4	2.18	2.63	3.25	3.97	3.68
2009-Q1	1.76	2.23	2.74	3.69	3.45
2009-Q2	2.23	2.88	3.31	4.19	4.17
2009-Q3	2.47	3.12	3.52	4.28	4.32
2009-Q4	2.30	2.98	3.46	4.27	4.33
2010-Q1	2.42	3.16	3.72	4.49	4.62
2010-Q2	2.25	2.93	3.49	4.20	4.37
2010-Q3	1.55	2.19	2.79	3.60	3.85
2010-Q4	1.49	2.18	2.86	3.84	4.16
2011-Q1	2.12	2.83	3.46	4.32	4.56
2011-Q2	1.86	2.55	3.21	4.07	4.34
2011-Q3	1.15	1.78	2.43	3.34	3.70
2011-Q4	0.95	1.50	2.05	2.75	3.04
2012-Q1	0.90	1.44	2.04	2.80	3.14
2012-Q2	0.79	1.24	1.82	2.55	2.94
2012-Q3	0.67	1.08	1.64	2.37	2.75
2012-Q4	0.69	1.12	1.71	2.46	2.86
2013-Q1	0.83	1.32	1.95	2.75	3.14
2013-Q2	0.92	1.39	2.00	2.78	3.15
2013-Q3	1.51	2.12	2.71	3.44	3.72
2013-Q4	1.44	2.12	2.75	3.50	3.79
2014-Q1	1.60	2.22	2.76	3.42	3.68
2014-Q2	1.66	2.19	2.62	3.18	3.15
2014-Q3	1.70	2.16	2.50	3.01	3.26
2014-Q4	1.60	2.00	2.28	2.69	2.97

Implied Market-based Inflationary Expectations					
Qtr	5-Yr	7-Yr	10-Yr	20-Yr	30-Yr
2003-Q1	1.58	1.65	1.85		
2003-Q2	1.42	1.52	1.68		
2003-Q3	1.78	1.87	2.03		
2003-Q4	2.01	2.13	2.28		
2004-Q1	2.17	2.26	2.31		
2004-Q2	2.47	2.50	2.55		
2004-Q3	2.34	2.37	2.41	2.79	
2004-Q4	2.56	2.55	2.48	2.79	
2005-Q1	2.72	2.68	2.58	2.83	
2005-Q2	2.57	2.55	2.48	2.72	
2005-Q3	2.44	2.41	2.39	2.52	
2005-Q4	2.47	2.44	2.45	2.64	
2006-Q1	2.55	2.50	2.48	2.69	
2006-Q2	2.65	2.62	2.61	2.80	
2006-Q3	2.47	2.48	2.52	2.71	
2006-Q4	2.20	2.24	2.31	2.54	
2007-Q1	2.36	2.32	2.35	2.54	
2007-Q2	2.41	2.39	2.41	2.58	
2007-Q3	2.13	2.16	2.28	2.55	
2007-Q4	2.24	2.17	2.34	2.54	
2008-Q1	2.17	2.13	2.34	2.59	
2008-Q2	2.37	2.29	2.40	2.56	
2008-Q3	1.93	1.96	2.16	2.33	
2008-Q4	-0.55	-0.29	0.65	1.24	
2009-Q1	0.39	0.69	0.95	1.35	
2009-Q2	1.11	1.51	1.60	1.88	
2009-Q3	1.30	1.72	1.77	2.06	
2009-Q4	1.72	2.04	2.09	2.29	
2010-Q1	1.96	2.22	2.28	2.49	2.47
2010-Q2	1.80	2.03	2.13	2.43	2.49
2010-Q3	1.35	1.63	1.73	1.92	2.09
2010-Q4	1.59	1.90	2.12	2.36	2.51
2011-Q1	2.05	2.16	2.37	2.61	2.56
2011-Q2	2.15	2.22	2.41	2.57	2.56
2011-Q3	1.81	2.00	2.15	2.39	2.45
2011-Q4	1.71	1.89	1.99	2.14	2.19
2012-Q1	1.92	2.04	2.20	2.29	2.36
2012-Q2	1.86	1.99	2.17	2.21	2.28
2012-Q3	1.94	2.09	2.28	2.35	2.31
2012-Q4	2.11	2.27	2.47	2.48	2.50
2013-Q1	2.23	2.31	2.54	2.55	2.58
2013-Q2	1.95	2.01	2.25	2.32	2.34
2013-Q3	1.82	1.95	2.15	2.29	2.29
2013-Q4	1.73	1.86	2.17	2.31	2.29
2014-Q1	1.77	1.85	2.18	2.30	2.29
2014-Q2	1.90	1.92	2.20	2.30	1.71
2014-Q3	1.83	1.92	2.18	2.28	2.29
2014-Q4	1.41	1.61	1.83	1.95	2.02

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**PUBLIC UTILITY COMMISSION
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STAFF EXHIBIT 205

Staff Historical GDP Analysis with BEA Data

**Exhibits in Support
of Opening Testimony**


June 15, 2015

Staff Trend Analysis of Historical U.S. BEA GDP Data


Bureau of Economic Analysis (BEA)			Staff Accessed			1/30/15			
Current-Dollar and "Real" Gross Domestic Product (GDP)						1980 through 2014 Q4			
Annual		Quarterly				Average			
http://www.bea.gov/national/index.htm		(Seasonally adjusted annual rates)				5.37% Nominal			
Yr	GDP in billions of current dollars	GDP in billions of chained 2009 dollars	Quarter	GDP in billions of current dollars	GDP in billions of chained 2009 dollars	Qtr#	Average	2.74%	Real
1929	104.6	1,056.6	1947q1	243.1	1,934.5	1	1	8.783381	1980
1930	92.2	966.7	1947q2	246.3	1,932.3	2	2	8.762896	
1931	77.4	904.8	1947q3	250.1	1,930.3	3	3	8.761378	
1932	59.5	788.2	1947q4	260.3	1,960.7	4	4	8.779742	
1933	57.2	778.3	1948q1	266.2	1,989.5	5	5	8.800219	1981
1934	66.8	862.2	1948q2	272.9	2,021.9	6	6	8.792899	
1935	74.3	939.0	1948q3	279.5	2,033.2	7	7	8.804310	
1936	84.9	1,060.5	1948q4	280.7	2,035.3	8	8	8.792565	
1937	93.0	1,114.6	1949q1	275.4	2,007.5	9	9	8.775704	1982
1938	87.4	1,077.7	1949q2	271.7	2,000.8	10	10	8.781125	
1939	93.5	1,163.6	1949q3	273.3	2,022.8	11	11	8.777525	
1940	102.9	1,266.1	1949q4	271.0	2,004.7	12	12	8.778495	
1941	129.4	1,490.3	1950q1	281.2	2,084.6	13	13	8.791516	1983
1942	166.0	1,771.8	1950q2	290.7	2,147.6	14	14	8.814078	
1943	203.1	2,073.7	1950q3	308.5	2,230.4	15	15	8.833463	
1944	224.6	2,239.4	1950q4	320.3	2,273.4	16	16	8.853880	
1945	228.2	2,217.8	1951q1	336.4	2,304.5	17	17	8.873552	1984
1946	227.8	1,960.9	1951q2	344.5	2,344.5	18	18	8.890961	
1947	249.9	1,939.4	1951q3	351.8	2,392.8	19	19	8.900753	
1948	274.8	2,020.0	1951q4	356.6	2,398.1	20	20	8.908695	
1949	272.8	2,008.9	1952q1	360.2	2,423.5	21	21	8.918583	1985
1950	300.2	2,184.0	1952q2	361.4	2,428.5	22	22	8.927699	
1951	347.3	2,360.0	1952q3	368.1	2,446.1	23	23	8.943140	
1952	367.7	2,456.1	1952q4	381.2	2,526.4	24	24	8.950611	
1953	389.7	2,571.4	1953q1	388.5	2,573.4	25	25	8.959838	1986
1954	391.1	2,556.9	1953q2	392.3	2,593.5	26	26	8.964414	
1955	426.2	2,739.0	1953q3	391.7	2,578.9	27	27	8.974441	
1956	450.1	2,797.4	1953q4	386.5	2,539.8	28	28	8.979606	
1957	474.9	2,856.3	1954q1	385.9	2,528.0	29	29	8.988572	1987
1958	482.0	2,835.3	1954q2	386.7	2,530.7	30	30	8.997729	
1959	522.5	3,031.0	1954q3	391.6	2,559.4	31	31	9.006754	
1960	543.3	3,108.7	1954q4	400.3	2,609.3	32	32	9.023131	
1961	563.3	3,188.1	1955q1	413.8	2,683.8	33	33	9.028735	1988
1962	605.1	3,383.1	1955q2	422.2	2,727.5	34	34	9.041863	
1963	638.6	3,530.4	1955q3	430.9	2,764.1	35	35	9.047621	
1964	685.8	3,734.0	1955q4	437.8	2,780.8	36	36	9.060784	
1965	743.7	3,976.7	1956q1	440.5	2,770.0	37	37	9.070814	1989
1966	815.0	4,238.9	1956q2	446.8	2,792.9	38	38	9.078647	
1967	861.7	4,355.2	1956q3	452.0	2,790.6	39	39	9.086080	
1968	942.5	4,569.0	1956q4	461.3	2,836.2	40	40	9.088195	
1969	1,019.9	4,712.5	1957q1	470.6	2,854.5	41	41	9.099085	1990
1970	1,075.9	4,722.0	1957q2	472.8	2,848.2	42	42	9.102944	
1971	1,167.8	4,877.6	1957q3	480.3	2,875.9	43	43	9.103189	
1972	1,282.4	5,134.3	1957q4	475.7	2,846.4	44	44	9.094638	
1973	1,428.5	5,424.1	1958q1	468.4	2,772.7	45	45	9.089934	1991
1974	1,548.8	5,396.0	1958q2	472.8	2,790.9	46	46	9.097664	
1975	1,688.9	5,385.4	1958q3	486.7	2,855.5	47	47	9.102454	
1976	1,877.6	5,675.4	1958q4	500.4	2,922.3	48	48	9.106800	
1977	2,086.0	5,937.0	1959q1	511.1	2,976.6	49	49	9.118554	1992
1978	2,356.6	6,267.2	1959q2	524.2	3,049.0	50	50	9.129510	
1979	2,632.1	6,466.2	1959q3	525.2	3,043.1	51	51	9.139188	
1980	2,862.5	6,450.4	1959q4	529.3	3,055.1	52	52	9.149156	


OLS Regression					
Annualized Real LN GDP Q					
2.87%					
<i>Regression Statistics</i>					
Multiple R	0.988570992				
R Square	0.977272606				
Adjusted R	0.977107915				
Standard E	0.044086238				
Observatio	140				
<i>ANOVA</i>					
	<i>df</i>	<i>SS</i>	<i>MS</i>	<i>F</i>	<i>Significance F</i>
Regressor	1	11.53323798	11.53323798	5933.9676	2.7419E-115
Residual	138	0.2682163	0.001943596		
Total	139	11.80145428			
<i>Coefficients</i>					
Intercept	8.781241805	0.007492035	1172.077033	9.2E-278	8.766427778 8.796055831 8.766427778 8.796055831
X Variable	0.007102075	9.21961E-05	77.03225051	2.74E-115	0.006919776 0.007284375 0.006919776 0.007284375

GDP is an array of expenditure and income data collected by BEA directly and through other government agencies.



www.bea.gov





Note July 31, 2013, 14th Comprehensive Significant Revision: BEA revised its tables back to 1929 in to order to count:
 1 Artistic Works
 2 Research and Development
 as Capital Investments that Depreciate Over Time rather than one time expenditures

From an Economy based on (Industry and Manufacturing) to one based on (Knowledge and Information)

This comprehensive revision did not cause a large percentage jump. The relative difference of actual amounts over time changed little.

Staff intentionally truncates data feed and transformation. – See Staff work papers for full data feed.

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**PUBLIC UTILITY COMMISSION
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STAFF EXHIBIT 206

Representative GDP Growth Projections

**Exhibits in Support
of Opening Testimony**

June 15, 2015

The President's 2016 Fiscal Year Budget – Chapter 5 – Summary Tables

Table S-12 Economic Assumptions – <https://medium.com/budget-document/>:

Table S-12. Economic Assumptions¹

(Calendar years)

	Projections												
	Actual 2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Gross Domestic Product (GDP):													
Nominal level, billions of dollars	16,768	17,394	18,188	19,039	19,933	20,847	21,770	22,717	23,705	24,736	25,812	26,934	28,106
Percent change, nominal GDP, year/year	3.7	3.7	4.6	4.7	4.7	4.6	4.4	4.3	4.3	4.3	4.3	4.3	4.3
Real GDP, percent change, year/year	2.2	2.2	3.1	3.0	2.8	2.6	2.4	2.3	2.3	2.3	2.3	2.3	2.3
Real GDP, percent change, Q4/Q4	3.1	2.1	3.0	3.0	2.7	2.5	2.3	2.3	2.3	2.3	2.3	2.3	2.3
GDP chained price index, percent change, year/year	1.5	1.5	1.4	1.6	1.8	2.0	2.0	2.0	2.0	2.0	2.0	2.0	2.0
Consumer Price Index,² percent change, year/year	1.5	1.7	1.4	1.9	2.1	2.2	2.3	2.3	2.3	2.3	2.3	2.3	2.3
Interest rates, percent:³													
91-day Treasury bills ⁴	0.1	=	0.4	1.5	2.4	2.9	3.2	3.3	3.4	3.4	3.5	3.5	3.5
10-year Treasury notes	2.4	2.6	2.8	3.3	3.7	4.0	4.3	4.5	4.5	4.5	4.5	4.5	4.5
Unemployment rate, civilian, percent³	7.4	6.2	5.4	5.1	4.9	4.9	5.0	5.1	5.2	5.2	5.2	5.2	5.2

⁰0.05 percent or less.

Note: A more detailed table of economic assumptions appears in Chapter 2, "Economic Assumptions and Interactions with the Budget," in the *Analytical Perspectives* volume of the Budget.

¹Based on information available as of mid-November 2014.

²Seasonally adjusted CPI for all urban consumers.

³Annual average.

⁴Average rate, secondary market (bank discount basis).

Chapter 6 – OMB Contributors To The 2016 Budget

CASE: UE 294
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**PUBLIC UTILITY COMMISSION
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STAFF EXHIBIT 207

Cost of Long-Term Debt

**Exhibits in Support
Of Opening Testimony**

**REDACTED
June 15, 2015**

Staff/207
Muldoon/1

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**PUBLIC UTILITY COMMISSION
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STAFF EXHIBIT 208

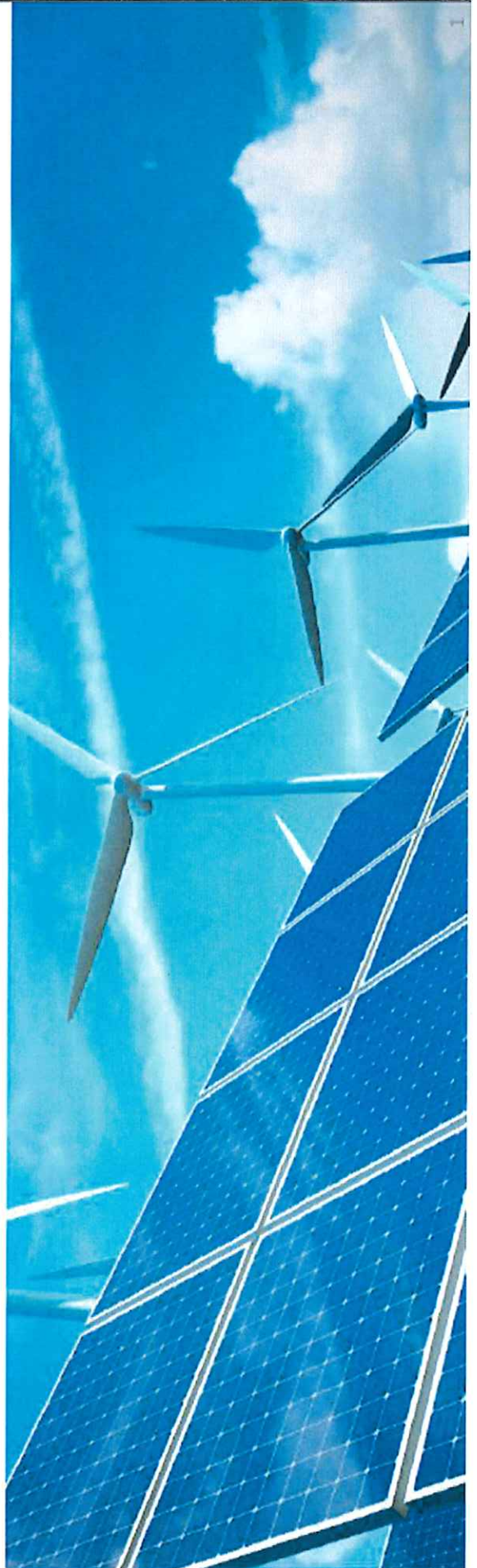
**PGE Depiction of Rate Base Expansion
to Investors**

**Exhibits in Support
of Opening Testimony**

June 15, 2015



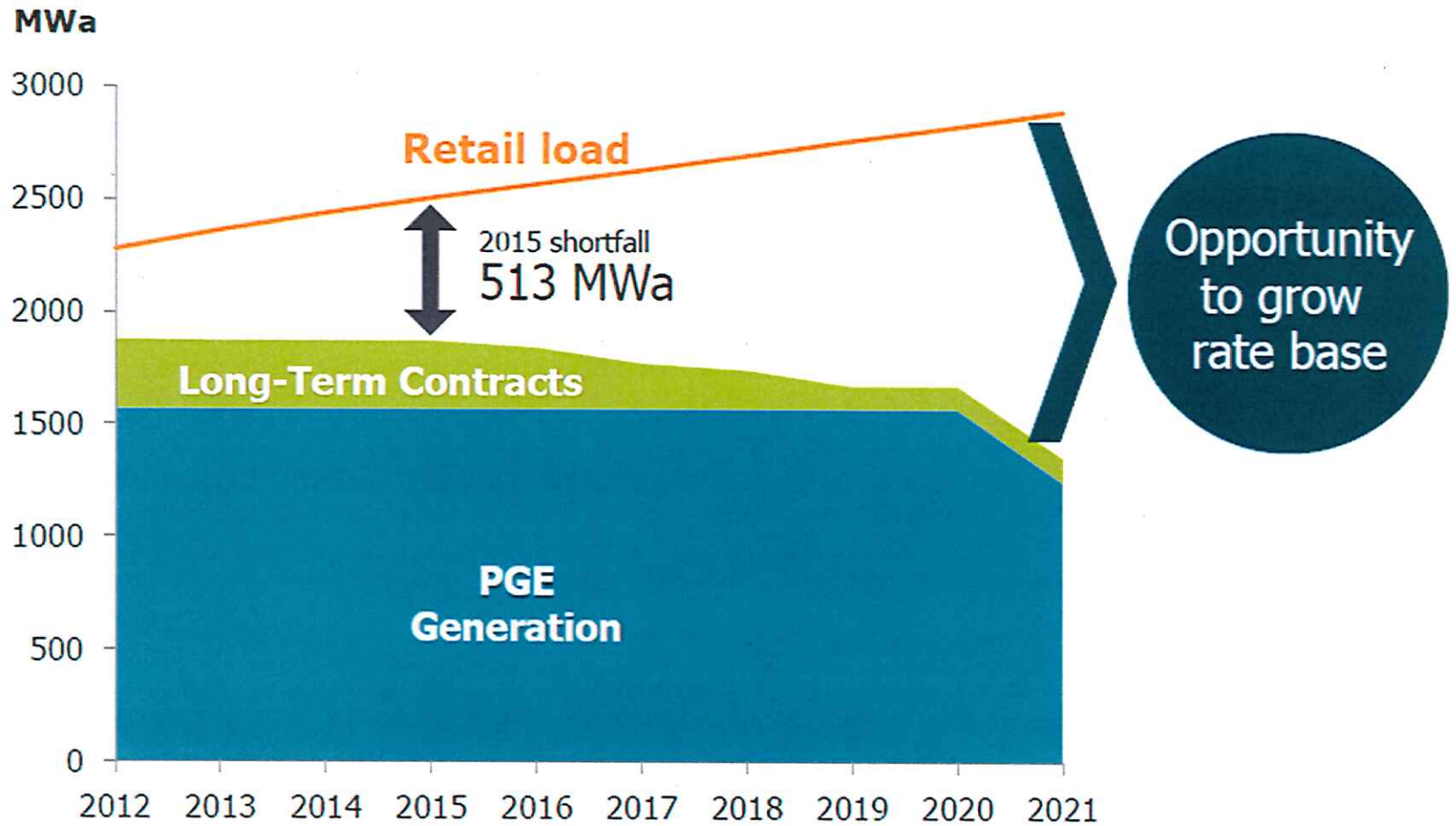
Investor Presentation August 2012



Future Generation Need

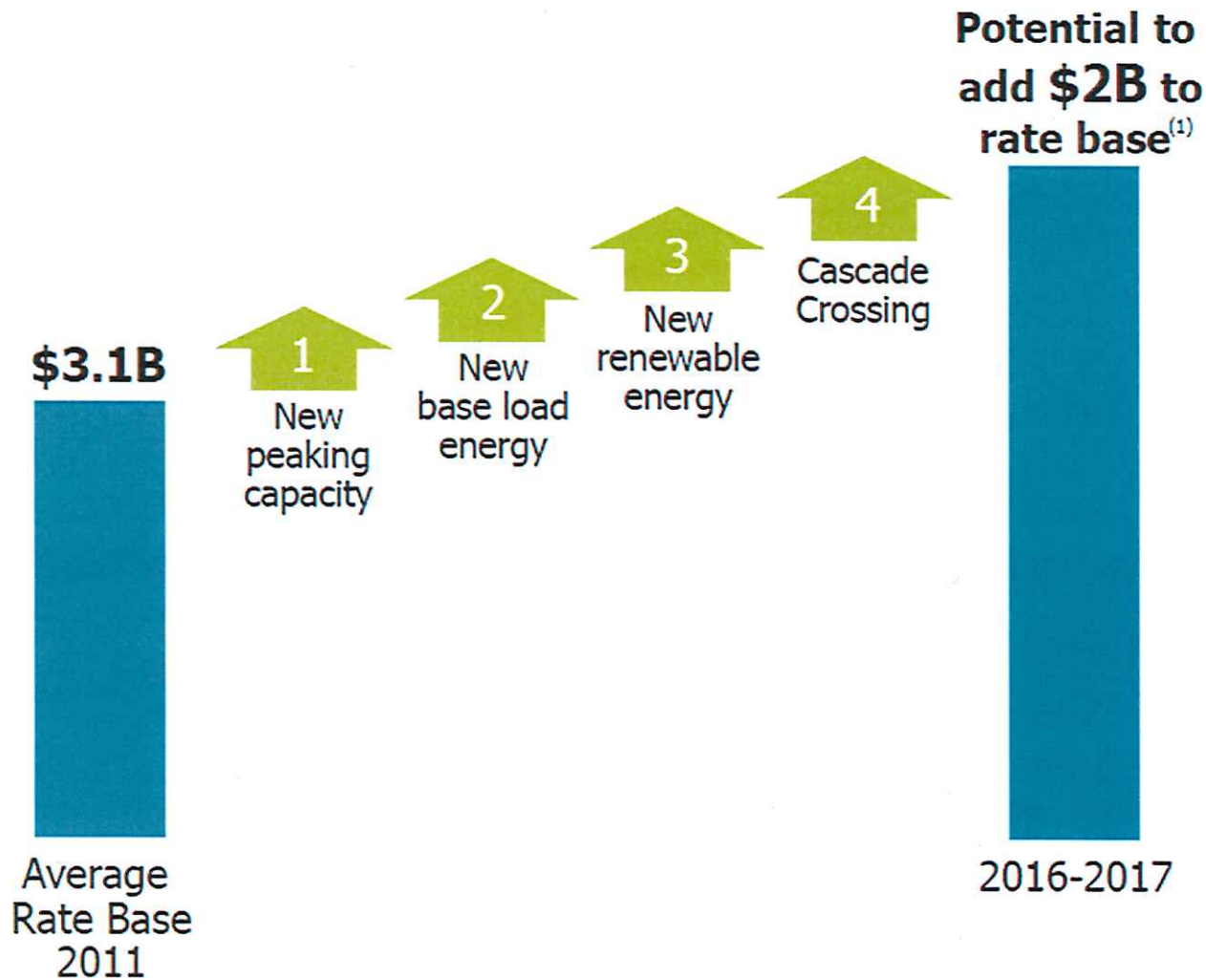


Load-Resource Forecast⁽¹⁾ - Energy Demand Exceeds Generation Resources



1) Load-Resource Forecast Data from 2011 IRP Update, filed with the OPUC on 11/23/2011; shortfall is net of energy efficiency

Potential Opportunities for Rate Base Growth



1) Rate base growth dependent on outcome of RFP processes; PGE is committed to move forward with the least cost, least risk option for customers

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**Value Line (VL)
Electric Utility Profiles**

**Exhibits in Support
of Opening Testimony**

June 15, 2015

ALLETE NYSE-ALE		RECENT PRICE	P/E RATIO 17.4 (Trailing: 17.8 Median: NMF)								RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE	
TIMELINESS 3 Lowered 9/19/14 SAFETY 2 New 10/1/04 TECHNICAL 4 Lowered 12/12/14 BETA .80 (1.00 = Market)		53.22	37.5	51.7	49.3	51.3	49.0	35.3	37.9	42.5	0.94	3.8%	Target Price Range 2017 2018 2019	
2017-19 PROJECTIONS Price 60 Gain (+15%) Ann'l Total Return 7% Low 45 (-15%) 1%		30.8	35.7	42.6	38.2	28.3	23.3	30.0	35.1	42.7	54.1	53.3	120 100 80 64 48 32 24 20 16 12 8	
Insider Decisions J F M A M J J A S to Buy 0 0 0 0 0 0 0 0 0 Options 0 0 0 0 0 0 0 0 1 to Sell 0 0 0 0 0 0 0 0 1												% TOT. RETURN 11/14 THIS STOCK 7.6 VL ARITH. INDEX 8.0 1 yr. 44.7 3 yr. 72.4 5 yr. 89.9 119.8		
Institutional Decisions 1Q2014 2Q2014 3Q2014 to Buy 92 98 104 to Sell 66 75 75 Hld's(000) 29252 29801 29758 Percent shares traded 15 10 5		LEGENDS 0.80 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession										© VALUE LINE PUB. LLC 17-19		
ALLETE, in its current configuration, began trading on September 21, 2004, the day after it spun off its automotive services business, ADESA (now KAR Auction Services, NYSE: KAR), to shareholders and effected a 1-for-3 reverse stock split. ALLETE shareholders received one share of ADESA for each ALLETE share held. Data for the "old" ALLETE are not shown because they are not comparable.		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh 28.25 "Cash Flow" per sh 7.25 Earnings per sh^A 3.75 Div'd Decl'd per sh^B † 2.30 Cap'l Spending per sh 5.50 Book Value per sh^C 40.50 Common Shs Outst'g^D 49.50 Avg Ann'l P/E Ratio 13.5 Relative P/E Ratio .85 Avg Ann'l Div'd Yield 4.5%
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$1377.2 mill. Due in 5 Yrs \$246.0 mill. LT Debt \$1289.2 mill. LT Interest \$57.7 mill. (LT interest earned: 3.8x) Leases, Uncapitalized Annual rentals \$12.1 mill.		751.4	737.4	767.1	841.7	801.0	759.1	907.0	928.2	961.2	1018.4	1150	1215	Revenues (\$mill) 1400 Net Profit (\$mill) 180 Income Tax Rate 15.0% AFUDC % to Net Profit 2.0% Long-Term Debt Ratio 42.0% Common Equity Ratio 58.0% Total Capital (\$mill) 3475 Net Plant (\$mill) 3475
Pension Assets-12/13 \$501.6 mill. Oblig. \$622.8 mill.		38.8%	28.4%	37.5%	34.8%	34.3%	33.7%	37.2%	27.6%	28.1%	21.5%	22.0%	15.0%	Return on Total Cap'l 5.5% Return on Shr. Equity 9.0% Return on Com Equity^E 9.0% Retained to Com Eq 3.5% All Div'ds to Net Prof 63%
Pfd Stock None Common Stock 44,499,229 shs.		1.8%	4%	1.4%	6.6%	5.8%	12.8%	8.9%	2.7%	5.3%	4.4%	7.0%	3.0%	5.1% 8.0% 8.6% 8.6% 6.7% 4.8% 5.4% 6.0% 5.6% 5.3% 5.0% 5.5% 6.1% 11.3% 11.6% 11.8% 10.0% 6.6% 7.7% 8.7% 8.1% 7.8% 7.5% 8.5% 6.1% 11.3% 11.6% 11.8% 10.0% 6.6% 7.7% 8.7% 8.1% 7.8% 7.5% 8.5%
MARKET CAP: \$2.4 billion (Mid Cap)		4.7%	5.2%	5.0%	5.8%	.5%	1.5%	2.9%	2.3%	2.2%	2.5%	3.0%	23% 54% 57% 51% 61% 93% 81% 66% 71% 72% 70% 65%	
ELECTRIC OPERATING STATISTICS		BUSINESS: ALLETE, Inc. is the parent of Minnesota Power, which supplies electricity to 146,000 customers in northeastern MN, & Superior Water, Light & Power in northwestern WI. Electric rev. breakdown: taconite mining/processing, 27%; paper/wood products, 9%; other industrial, 7%; residential, 12%; commercial, 13%; wholesale, 10% other, 22%. ALLETE Clean Energy owns renewable energy projects. Has real estate operation in FL. Spun off automotive remarketing operation in '04. Generating sources: coal & lignite, 63%; wind, 6%; hydro, 1%; biomass, 1%; purch., 29%. '13 deprec. rate: 3.0%. Has 1,600 employees. Chairman, President & CEO: Alan R. Hodnik. Inc.: MN. Address: 30 West Superior St., Duluth, MN 55802-2093. Tel.: 218-279-5000. Internet: www.allete.com.												
ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Est'd '11-'13 of change (per sh)		ALLETE's earnings are likely to advance significantly this year. The company's main utility subsidiary, Minnesota Power, benefits from current cost recovery for certain kinds of capital projects (renewable, environmental, and transmission). The utility is building a 205-megawatt wind project that should be completed soon at a cost of \$345 million. Another project, an environmental upgrade to a 585-mw coal-fired unit, should be completed by April of 2016 at a cost of \$250 million. Management is guiding investors towards the upper end of its 2014 earnings target of \$2.75-\$2.95 a share. Note that our \$2.85 estimate includes \$0.09 of costs that ALLETE is excluding from its guidance. We forecast another solid profit increase in 2015. Minnesota Power will have a full year of income from the aforementioned wind project. The environmental upgrade will be ongoing. We assume no unusual expenses. Finally, in the fourth quarter of 2015, the company should record a profit (which has not been disclosed) on a \$200 million wind project that the its ALLETE Clean Energy subsidiary is developing in North Dakota for Montana-Dakota Utilities. There should be another boost to the bottom line in 2016. A large industrial customer, Essar Steel, is expanding its production capacity. Originally, production was expected to begin in late 2013, but the project was delayed. Production should finally begin by the second half of 2015, but full production won't be reached until early 2016. We look for a dividend hike in early 2015. This has been the pattern in recent years. We estimate that the board will boost the quarterly payout by two cents a share (4.1%). ALLETE's share price has risen just 7% so far this year. This is well below the performance of most electric utility equities in 2014, many of which have surged more than 20%. Perhaps investors were concerned about the delay at Essar Steel. The yield, reflecting the expected dividend hike, is slightly above the utility mean. Total return potential to 2017-2019 is low, but still somewhat better than the industry average. <i>Paul E. Debbas, CFA December 19, 2014</i>												
QUARTERLY REVENUES (\$ mill.) Full Year		ALLETE's earnings are likely to advance significantly this year. The company's main utility subsidiary, Minnesota Power, benefits from current cost recovery for certain kinds of capital projects (renewable, environmental, and transmission). The utility is building a 205-megawatt wind project that should be completed soon at a cost of \$345 million. Another project, an environmental upgrade to a 585-mw coal-fired unit, should be completed by April of 2016 at a cost of \$250 million. Management is guiding investors towards the upper end of its 2014 earnings target of \$2.75-\$2.95 a share. Note that our \$2.85 estimate includes \$0.09 of costs that ALLETE is excluding from its guidance. We forecast another solid profit increase in 2015. Minnesota Power will have a full year of income from the aforementioned wind project. The environmental upgrade will be ongoing. We assume no unusual expenses. Finally, in the fourth quarter of 2015, the company should record a profit (which has not been disclosed) on a \$200 million wind project that the its ALLETE Clean Energy subsidiary is developing in North Dakota for Montana-Dakota Utilities. There should be another boost to the bottom line in 2016. A large industrial customer, Essar Steel, is expanding its production capacity. Originally, production was expected to begin in late 2013, but the project was delayed. Production should finally begin by the second half of 2015, but full production won't be reached until early 2016. We look for a dividend hike in early 2015. This has been the pattern in recent years. We estimate that the board will boost the quarterly payout by two cents a share (4.1%). ALLETE's share price has risen just 7% so far this year. This is well below the performance of most electric utility equities in 2014, many of which have surged more than 20%. Perhaps investors were concerned about the delay at Essar Steel. The yield, reflecting the expected dividend hike, is slightly above the utility mean. Total return potential to 2017-2019 is low, but still somewhat better than the industry average. <i>Paul E. Debbas, CFA December 19, 2014</i>												
EARNINGS PER SHARE^A Full Year		ALLETE's earnings are likely to advance significantly this year. The company's main utility subsidiary, Minnesota Power, benefits from current cost recovery for certain kinds of capital projects (renewable, environmental, and transmission). The utility is building a 205-megawatt wind project that should be completed soon at a cost of \$345 million. Another project, an environmental upgrade to a 585-mw coal-fired unit, should be completed by April of 2016 at a cost of \$250 million. Management is guiding investors towards the upper end of its 2014 earnings target of \$2.75-\$2.95 a share. Note that our \$2.85 estimate includes \$0.09 of costs that ALLETE is excluding from its guidance. We forecast another solid profit increase in 2015. Minnesota Power will have a full year of income from the aforementioned wind project. The environmental upgrade will be ongoing. We assume no unusual expenses. Finally, in the fourth quarter of 2015, the company should record a profit (which has not been disclosed) on a \$200 million wind project that the its ALLETE Clean Energy subsidiary is developing in North Dakota for Montana-Dakota Utilities. There should be another boost to the bottom line in 2016. A large industrial customer, Essar Steel, is expanding its production capacity. Originally, production was expected to begin in late 2013, but the project was delayed. Production should finally begin by the second half of 2015, but full production won't be reached until early 2016. We look for a dividend hike in early 2015. This has been the pattern in recent years. We estimate that the board will boost the quarterly payout by two cents a share (4.1%). ALLETE's share price has risen just 7% so far this year. This is well below the performance of most electric utility equities in 2014, many of which have surged more than 20%. Perhaps investors were concerned about the delay at Essar Steel. The yield, reflecting the expected dividend hike, is slightly above the utility mean. Total return potential to 2017-2019 is low, but still somewhat better than the industry average. <i>Paul E. Debbas, CFA December 19, 2014</i>												
QUARTERLY DIVIDENDS PAID^B † Full Year		ALLETE's earnings are likely to advance significantly this year. The company's main utility subsidiary, Minnesota Power, benefits from current cost recovery for certain kinds of capital projects (renewable, environmental, and transmission). The utility is building a 205-megawatt wind project that should be completed soon at a cost of \$345 million. Another project, an environmental upgrade to a 585-mw coal-fired unit, should be completed by April of 2016 at a cost of \$250 million. Management is guiding investors towards the upper end of its 2014 earnings target of \$2.75-\$2.95 a share. Note that our \$2.85 estimate includes \$0.09 of costs that ALLETE is excluding from its guidance. We forecast another solid profit increase in 2015. Minnesota Power will have a full year of income from the aforementioned wind project. The environmental upgrade will be ongoing. We assume no unusual expenses. Finally, in the fourth quarter of 2015, the company should record a profit (which has not been disclosed) on a \$200 million wind project that the its ALLETE Clean Energy subsidiary is developing in North Dakota for Montana-Dakota Utilities. There should be another boost to the bottom line in 2016. A large industrial customer, Essar Steel, is expanding its production capacity. Originally, production was expected to begin in late 2013, but the project was delayed. Production should finally begin by the second half of 2015, but full production won't be reached until early 2016. We look for a dividend hike in early 2015. This has been the pattern in recent years. We estimate that the board will boost the quarterly payout by two cents a share (4.1%). ALLETE's share price has risen just 7% so far this year. This is well below the performance of most electric utility equities in 2014, many of which have surged more than 20%. Perhaps investors were concerned about the delay at Essar Steel. The yield, reflecting the expected dividend hike, is slightly above the utility mean. Total return potential to 2017-2019 is low, but still somewhat better than the industry average. <i>Paul E. Debbas, CFA December 19, 2014</i>												

(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 eps. report due mid-Feb. (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 '12: \$6.37/sh. (D) In mill. (E) Rate base: Original cost deprec. Rate allowed on com. eq. in '10: 10.38%; earned on avg. com. eq. '13: 8.3%. Regulatory Climate: Avg. (F) Summer peak in '12 & '13.

Company's Financial Strength A
Stock's Price Stability 95
Price Growth Persistence 35
Earnings Predictability 85

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ALLIANT ENERGY NYSE-LNT		RECENT PRICE	P/E RATIO		RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE											
		64.63	19.2 (Trailing: 18.6 Median: 14.0)		1.04	3.2%												
TIMELINESS 3 Lowered 8/22/14	High: 25.1 28.8 30.6 40.0 46.5 42.4 31.5 37.7 44.5 47.7 54.2 64.9	Low: 15.0 23.5 25.6 27.5 34.9 22.8 20.3 29.2 33.9 41.9 43.7 50.0					Target Price Range 2017 2018 2019											
SAFETY 2 Raised 9/28/07	LEGENDS 0.90 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession						120 100 80 64 48 32 24 20 16 12 8											
TECHNICAL 4 Lowered 11/14/14	2017-19 PROJECTIONS																	
BETA .80 (1.00 = Market)	Price	Gain	Ann'l Total Return															
	High 70 (+10%)	Low 50 (-25%)	5%															
Insider Decisions		J F M A M J J A S																
to Buy 0 0 0 0 0 0 0 0 0																		
Options 0 0 0 0 0 0 0 0 0																		
to Sell 0 0 1 0 0 0 0 1 0																		
Institutional Decisions		10/2014 20/2014 30/2014		Percent shares traded														
to Buy 159 160 152				12 8														
to Sell 145 134 151				4														
Hld's(000) 65696 67528 67088																		
						% TOT. RETURN 11/14												
						THIS STOCK 26.5 3 yr. 65.1 5 yr. 177.2												
						VL ARITH. INDEX 8.0 72.4 119.8												
						© VALUE LINE PUB. LLC 17-19												
ALLIANT ENERGY, formerly called Interstate Energy Corporation, was formed on April 21, 1998 through the merger of WPL Holdings, IES Industries, and Interstate Power. WPL stockholders received one share of Interstate Energy stock for each WPL share, IES stockholders received 1.14 Interstate Energy shares for each IES share, and Interstate Power stockholders received 1.11 Interstate Energy shares for each Interstate Power share.		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh	34.80			
		25.56	28.02	28.93	31.15	33.33	31.02	30.81	33.02	27.88	29.54	30.20	31.25	"Cash Flow" per sh	7.75			
		4.69	5.46	4.33	5.12	4.56	4.21	5.21	5.51	5.90	6.68	6.85	6.85	Earnings per sh A	4.10			
		1.85	2.21	2.06	2.69	2.54	1.89	2.75	2.75	3.05	3.29	3.45	3.60	Div'd Decl'd per sh B = †	2.80			
		1.02	1.05	1.15	1.27	1.40	1.50	1.58	1.70	1.80	1.88	2.04	2.20	Cap'l Spending per sh	9.80			
		5.55	4.51	3.42	4.91	7.96	10.87	7.82	6.07	10.43	6.63	7.50	8.85	Book Value per sh C	34.65			
		22.13	20.85	22.83	24.30	25.56	25.07	26.09	27.14	28.25	29.58	30.50	31.35	Common Shs Outst'g D	115.00			
		115.74	117.04	116.13	110.36	110.45	110.66	110.89	111.02	110.99	110.94	111.00	112.00	Avg Ann'l P/E Ratio	15.0			
		14.0	12.6	16.8	15.1	13.4	13.9	12.5	14.5	14.5	15.3	15.0	15.0	Relative P/E Ratio	.95			
		.74	.67	.91	.80	.81	.93	.80	.91	.92	.86	.86	.86	Avg Ann'l Div'd Yield	4.2%			
		3.9%	3.8%	3.3%	3.1%	4.1%	5.7%	4.6%	4.3%	4.1%	3.7%	3.7%	3.7%					
CAPITAL STRUCTURE as of 9/30/14		2958.7	3279.6	3359.4	3437.6	3681.7	3432.8	3416.1	3665.3	3094.5	3276.8	3350	3500	Revenues (\$mill)	4000			
Total Debt \$1984.0 mill. Due in 5 Yrs \$772.6 mill.		229.5	337.8	260.1	320.8	280.0	208.6	303.9	304.4	337.8	364.9	380	405	Net Profit (\$mill)	470			
LT Debt \$1796.0 mill. LT Interest \$90.0 mill. (LT interest earned: 4.2x)		26.7%	19.0%	43.8%	44.4%	33.4%	--	30.1%	19.0%	21.5%	12.4%	15.0%	20.0%	Income Tax Rate	30.0%			
		8.1%	3.0%	3.1%	2.4%	--	--	--	8.8%	6.5%	7.0%	7.0%	7.0%	AFUDC % to Net Profit	8.0%			
Pension Assets-12/13 \$965.6 mill. Oblig. \$1113.4 mill.		45.0%	41.6%	31.4%	32.4%	36.3%	44.3%	46.3%	45.7%	48.4%	46.1%	47.5%	47.5%	Long-Term Debt Ratio	46.0%			
		50.2%	53.1%	62.9%	61.9%	58.6%	51.2%	49.5%	50.9%	48.4%	50.8%	49.5%	49.5%	Common Equity Ratio	51.5%			
Prd Stock \$200.0 mill. Prf Div'd \$10.2 mill. 8,000,000 shs.		5104.7	4599.1	4218.4	4329.5	4815.6	5423.0	5840.8	5921.2	6476.6	6461.0	6650	6850	Total Capital (\$mill)	7800			
		5284.6	4866.2	4944.9	4679.9	5353.5	6203.0	6730.6	7037.1	7838.0	7147.3	8200	8500	Net Plant (\$mill)	9500			
		6.1%	8.9%	7.5%	8.6%	7.0%	5.1%	6.6%	6.4%	6.3%	7.0%	7.0%	7.0%	Return on Total Cap'l	7.00			
		8.2%	12.6%	9.0%	11.0%	9.1%	6.9%	9.7%	9.5%	10.1%	11.0%	11.0%	11.0%	Return on Shr. Equity	11.5%			
		8.2%	13.1%	9.1%	11.3%	9.3%	6.8%	9.9%	9.5%	10.3%	11.3%	11.5%	11.5%	Return on Com Eq E	12.0%			
Common Stock 110,935,680 shs.		3.8%	8.1%	4.0%	5.9%	3.8%	.9%	3.8%	3.3%	3.9%	4.9%	4.0%	4.5%	Retained to Com Eq	5.0%			
		58%	42%	59%	50%	62%	88%	64%	67%	64%	57%	59%	61%	All Div'ds to Net Prof	68%			
MARKET CAP: \$7.2 billion (Large Cap)																		
ELECTRIC OPERATING STATISTICS		2011 2012 2013																
% Change Retail Sales (KWH)		+9 +3 +1																
Avg. Indust. Use (MWH)		11504 11555 11471																
Avg. Indust. Revs. per KWH (¢)		6.51 6.42 6.75																
Capacity at Peak (Mw)		5734 5886 5820																
Peak Load, Summer (Mw)		5734 5886 5820																
Annual Load Factor (%)		N/A N/A N/A																
% Change Customers (yr-end)		+2 +3 +4																
Fixed Charge Cov. (%)		302 332 295																
ANNUAL RATES		Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'15														
of change (per sh)		5%	-5%	4.0%														
Revenues		5%	-5%	4.0%														
"Cash Flow"		2.0%	5.5%	6.0%														
Earnings		6.0%	4.5%	6.0%														
Dividends		.5%	7.0%	4.5%														
Book Value		3.0%	3.0%	4.0%														
QUARTERLY REVENUES (\$ mill.)		Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year											
2011			945.0	819.5	1021.6	879.2	3665.3											
2012			765.7	690.3	887.6	750.9	3094.5											
2013			859.6	718.0	866.6	832.6	3276.8											
2014			952.8	750.3	843.0	803.9	3350											
2015			950	800	950	800	3500											
EARNINGS PER SHARE A		Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year											
2011			.68	.44	1.12	.51	2.75											
2012			.50	.58	1.34	.63	3.05											
2013			.72	.59	1.43	.55	3.29											
2014			.97	.56	1.40	.52	3.45											
2015			.85	.60	1.55	.60	3.60											
QUARTERLY DIVIDENDS PAID B = †		Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year											
2010			.395	.395	.395	.395	1.58											
2011			.425	.425	.425	.425	1.70											
2012			.45	.45	.45	.45	1.80											
2013			.47	.47	.47	.47	1.88											
2014			.51	.51	.51	.51												
BUSINESS: Alliant Energy Corp., formerly named Interstate Energy, is a holding company formed through the merger of WPL Holdings, IES Industries, and Interstate Power. Supplies electricity, gas, and other services in Wisconsin, Iowa, and Minnesota. Elect. revs. by state: WI, 47%; IA, 50%; MN, 3%. Elect. rev.: residential, 38%; commercial, 24%; industrial, 29%; wholesale, 7%; other, 2%. Fuel sources, 2013: coal, 48%; nuclear, 17%; gas, 4%; other, 31%. Fuel costs: 50% of revs. 2013 depreciation rate: 5.5%. Estimated plant age: 11 years. Has 3,950 employees. Chairman & Chief Executive Officer: Patricia L. Kampling. Incorporated: Wisconsin. Address: 4902 N. Billmore Lane, Madison, Wisconsin 53718. Telephone: 608-458-3311. Internet: www.alliantenergy.com.																		
Alliant Energy had a decent third quarter. The Wisconsin-based utility earned \$1.40 a share, on \$843 million in revenue. Both of those figures failed to surpass last year's comparable period. Lower profits were driven by the enhanced capital expenditures program, and revenues were dragged down by cooler-than-normal weather, which put a dent in electric sales.																		
Capital expenditures are going to continue at a brisk pace. Management updated its CapEx plan for 2014-2018 and raised the figure to \$5.2 billion (this number includes the new natural gas facility that it plans to build, discussed in the below paragraph). Alliant is building out its electric and gas distribution systems, partly due to a new set of regulatory rules that will be issued in 2015. These new provisions will likely require an acceleration of older pipeline replacements. Moreover, Alliant is also interested in building out its natural gas service. That will help it down the road once carbon emission restrictions become tougher to comply with.																		
The company is planning to build a 650-megawatt natural gas facility that could replace some of its older units. The new facility would be built alongside the Riverside Energy Center and will cost about \$750 million, according to management. The investment in new, highly efficient natural gas generation will provide several significant environmental benefits to the region, and could power more than half a million homes once finished. If regulators approve of the new compound, which is expected, construction will begin in 2016, and the plant should be up and running by early 2019.																		
A dividend increase of 8% was slightly more than we anticipated. The annualized dividend was raised to \$2.20, from \$2.04. Based on our earnings projections, we think the dividend can grow 6%-10% a year, due to Alliant's current payout ratio of just below 60%, and its stated payout target of 60%-70%. The company will likely reach the high end of that target within the next 3 to 5 years.																		
These shares, with their Above-Average Safety rank (2) and low Beta (.80), are best suited for income-oriented investors.																		
Daniel Henigson		December 19, 2014																

(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 Feb.
(B) Div'ds historically paid in mid-Feb., May, Aug., and Nov. Div'd reinvest. plan avail. † Shareholder invest. plan avail.
(C) Incl. deferred chgs. in '13: \$85.8 mill., \$0.77/sh. (D) In mill. (E) Rate base: Orig. cost. Rates all'd on com. eq. in IA '13: 9.5%; in WI in '13 Reg'd. Clim.: WI, Above Avg.; IA, Avg.
Company's Financial Strength A
Stock's Price Stability 100
Price Growth Persistence 90
Earnings Predictability 75
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AMEREN NYSE-AEE

RECENT PRICE **43.87** P/E RATIO **18.8** (Trailing: 18.2) RELATIVE P/E RATIO **1.02** DIV'D YLD **3.8%** VALUE LINE

TIMELINESS **4** Lowered 12/12/14
SAFETY **2** Raised 6/20/14
TECHNICAL **4** Lowered 11/14/14
BETA .75 (1.00 = Market)

High: 46.5 50.4 56.8 55.2 55.0 54.3 35.3 29.9 34.1 35.3 37.3 44.2
Low: 37.4 40.6 47.5 48.0 47.1 25.5 19.5 23.1 25.5 28.4 30.6 35.2

LEGENDS
0.68 x Dividends p sh divided by Interest Rate
Relative Price Strength
Options: Yes
Shaded area indicates recession

2017-19 PROJECTIONS

Price	Gain	Ann'l Total Return
High 45	(+5%)	4%
Low 35	(-20%)	-1%

Insider Decisions

J	F	M	A	M	J	J	A	S
to Buy	0	0	0	0	1	0	0	0
Options	0	0	0	0	0	0	0	0
to Sell	0	0	0	0	2	0	0	0

Institutional Decisions

10/2014	20/2014	30/2014	
to Buy	187	178	167
to Sell	184	189	197
Hld's(000)	154456	159084	160810

Percent shares traded: 15, 10, 5

% TOT. RETURN 11/14
THIS STOCK: 1 yr. 25.3, 3 yr. 46.6, 5 yr. 113.4
VL ARITH. INDEX: 8.0, 72.4, 119.8

1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC	17-19
24.18	25.68	28.10	32.64	24.93	28.20	26.43	33.12	33.30	36.23	36.92	29.87	31.77	31.04	28.14	24.06	24.95	26.15	Revenues per sh	28.50
5.36	5.36	6.11	6.33	5.28	6.29	5.57	6.10	6.02	6.76	6.44	6.06	6.33	5.87	5.87	5.25	5.70	6.10	"Cash Flow" per sh	7.00
2.82	2.81	3.33	3.41	2.66	3.14	2.82	3.13	2.66	2.98	2.88	2.78	2.77	2.47	2.41	2.10	2.35	2.55	Earnings per sh ^A	3.00
2.54	2.54	2.54	2.54	2.54	2.54	2.54	2.54	2.54	2.54	2.54	1.54	1.54	1.56	1.60	1.60	1.61	1.65	Div'd Decl'd per sh ^B	1.80
2.37	4.16	6.77	7.99	5.11	4.19	4.13	4.63	4.99	6.96	9.75	7.51	4.66	4.50	5.49	5.87	7.50	7.10	Cap'l Spending per sh	6.00
22.27	22.52	23.30	24.26	24.93	26.73	29.71	31.09	31.86	32.41	32.80	33.08	32.15	32.64	27.27	26.97	27.70	28.65	Book Value per sh ^C	32.00
137.22	137.22	137.22	138.05	154.10	162.90	195.20	204.70	206.60	208.30	212.30	237.40	240.40	242.60	242.63	242.63	242.65	242.65	Common Shs Outst'g ^D	252.00
14.2	13.5	11.0	12.1	15.8	13.5	16.3	16.7	19.4	17.4	14.2	9.3	9.7	11.9	13.4	16.5	Bold figures are Value Line estimates		Avg Ann'l P/E Ratio	13.5
.74	.77	.72	.62	.86	.77	.86	.89	1.05	.92	.85	.62	.62	.75	.85	.93			Relative P/E Ratio	.85
6.3%	6.7%	6.9%	6.2%	6.1%	6.0%	5.5%	4.9%	4.9%	4.9%	6.2%	6.0%	5.8%	5.3%	5.0%	4.6%			Avg Ann'l Div'd Yield	4.5%

CAPITAL STRUCTURE as of 9/30/14
Total Debt \$6697 mill. Due in 5 Yrs \$2276 mill.
LT Debt \$5825 mill. LT Interest \$317 mill.
(LT interest earned: 3.6x)
Leases, Uncapitalized Annual rentals \$14 mill.
Pension Assets-12/13 \$3461 mill. Oblig. \$3900 mill.
Pfd Stock \$142 mill. Pfd Div'd \$8 mill.
807,595 sh. \$3.50 to \$5.50 cum. (no par), \$100 stated val., redeem. \$102.176-\$110/sh.; 616,323 sh. 4.00% to 6.625%, \$100 par, redeem. \$100-\$104/sh.
Common Stock 242,634,798 shs. as of 10/31/14
MARKET CAP: \$11 billion (Large Cap)

5160.0	6780.0	6880.0	7546.0	7839.0	7090.0	7638.0	7531.0	6828.0	5838.0	6050	6350	Revenues (\$mill)	7200
541.0	628.0	547.0	629.0	615.0	624.0	669.0	602.0	589.0	518.0	580	630	Net Profit (\$mill)	775
34.3%	35.6%	32.7%	33.5%	33.7%	34.7%	36.8%	37.3%	36.9%	37.5%	39.5%	38.5%	Income Tax Rate	38.0%
1.8%	2.9%	.7%	.8%	4.6%	5.8%	7.8%	5.6%	6.1%	7.1%	7.0%	6.0%	AFUDC % to Net Profit	5.0%
45.5%	44.9%	43.8%	45.0%	47.8%	49.7%	48.2%	45.3%	49.5%	45.2%	47.0%	46.0%	Long-Term Debt Ratio	46.0%
52.6%	53.3%	54.6%	53.4%	50.8%	49.1%	50.9%	53.7%	49.4%	53.7%	52.0%	53.0%	Common Equity Ratio	53.0%
11036	11932	12063	12654	13712	15991	15185	14738	13384	12190	13000	13125	Total Capital (\$mill)	15200
13297	13572	14286	15069	16567	17610	17853	18127	16096	16205	17225	18100	Net Plant (\$mill)	20000
6.0%	6.5%	5.7%	6.2%	5.7%	5.3%	6.0%	5.6%	6.0%	5.6%	5.5%	6.0%	Return on Total Cap'l	6.5%
9.0%	9.5%	8.1%	9.0%	8.6%	7.8%	8.5%	7.5%	8.7%	7.7%	8.5%	9.0%	Return on Shr. Equity	9.5%
9.1%	9.7%	8.1%	9.2%	8.7%	7.8%	8.6%	7.5%	8.8%	7.8%	8.5%	9.0%	Return on Com Equity ^E	9.5%
.9%	1.7%	.2%	1.3%	1.0%	3.5%	3.8%	2.8%	3.0%	1.9%	2.5%	3.0%	Returned to Com Eq	4.0%
91%	83%	97%	86%	88%	56%	56%	63%	66%	76%	68%	64%	All Div'ds to Net Prof	59%

BUSINESS: Ameren Corp. is a holding company formed through the merger of Union Electric and CIPSCO. Acquired CLCORP 1/03; Illinois Power 10/04. Has 1.2 mill. electric and 127,000 gas customers in Missouri; 1.2 mill. electric and 811,000 gas customers in Illinois. Discont. power-generation op. in '13. Electric rev. breakdown: residential, 46%; commercial, 33%; industrial, 12%; other, 9%. Generating sources: coal, 70%; nuclear, 11%; hydro, 2%; gas, 1%; purchased, 16%. Fuel costs: 32% of revs. '13 reported depr. rates: 3%-4%. Has 8,500 employees. Chairman: Thomas R. Voss. President & CEO: Warner L. Baxter. Inc.: MO. Address: One Ameren Plaza, 1901 Chouteau Ave., P.O. Box 66149, St. Louis, MO 63166-6149. Tel.: 314-621-3222. Internet: www.ameren.com.

Ameren has an electric rate case pending in Missouri. The utility is seeking a rate increase of \$264 million (9.7%), based on a 10.4% return on a 51.6% common-equity ratio. The application is driven by higher net energy costs, infrastructure investments, and increases in certain expenses. The staff of the Missouri Public Service Commission is recommending a \$113 million increase, based on an ROE range with a midpoint of 9.25%. A decision is expected in May of 2015, with new tariffs taking effect by June.

Earnings will probably rise materially in 2014 and 2015. Profits in the first half of this year rose sharply, due in part to favorable weather patterns. (The weather turned unfavorable in the third quarter, however.) Ameren is also benefiting from the refinancing of high-cost debt at the parent level earlier this year. In 2015, rate relief and the absence of a refueling outage at the Callaway nuclear plant should boost the bottom line. All told, Ameren is targeting annual earnings growth in a range of 7%-10% through 2018.

Ameren is increasing its focus on electric transmission. The company's five-

year capital budget calls for spending \$2.25 billion on transmission. Ameren is now allowed a 12.38% ROE on its federally regulated transmission assets, but the Federal Energy Regulatory Commission (FERC) is reviewing the allowed ROEs for transmission owners in the region. In anticipation of a possible reduction in the allowed ROE, Ameren is asking FERC for a half percentage point "adder" to whatever its revised ROE turns out to be because the utility is participating in a regional transmission organization.

The board of directors raised the dividend in the fourth quarter. The quarterly increase was one cent a share (2.5%). This was Ameren's first dividend hike in three years. We project that annual boosts in the disbursement will continue over the 3- to 5-year period. Ameren is targeting a payout ratio in a range of 55%-70%.

Like many utility stocks, Ameren is trading near the upper end of its 2017-2019 Target Price Range. The dividend yield is just slightly above the industry mean, and 3- to 5-year total return potential is low. The stock is untimely.

Paul E. Debbas, CFA December 19, 2014

(A) Diluted EPS. Excl. nonrecur. gain (losses): '03, 11¢; '05, (11¢); '10, (\$2.19); '11, (32¢); '12, (\$6.42); loss from disc. ops.: '13, 92¢. '11 EPS don't add due to rounding. Next eggs. report due late Feb. (B) Div'ds histor. paid in late Mar., June, Sept., & Dec. Div'd reinvest. plan avail. (C) Incl. inlang. In '13: \$6.90/sh. (D) In mill. (E) Rate base: Orig. cost deprec. Rate allowed on com. eq. in MO in '13: 9.8% elec., in '11: none specified gas; in IL in '14: 8.7% elec., 9.06% gas; earned on avg. com. eq., '13: 7.6%. Regulatory Climate: MO, Avg.; IL, Below Avg.	Company's Financial Strength B++ Stock's Price Stability 100 Price Growth Persistence 5 Earnings Predictability 90
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AVISTA CORP. NYSE-AVA		RECENT PRICE	36.87	P/E RATIO	18.2 (Trailing: 19.3 Median: 16.0)	RELATIVE P/E RATIO	0.99	DIV'D YLD	3.6%	VALUE LINE									
TIMELINESS 3 Lowered 11/14/14	High: 18.7 19.4 20.2 27.5 25.8 23.6 22.4 22.8 26.5 28.0 29.3 37.4	Low: 9.8 15.4 16.3 17.6 18.2 15.5 12.7 18.5 21.1 22.8 24.1 27.7									Target Price Range 2017 2018 2019								
SAFETY 2 Raised 5/7/10	LEGENDS --- 0.2% Dividends p sh divided by Interest Rate ... Relative Price Strength Options: Yes Shaded area indicates recession										64								
TECHNICAL 2 Raised 1/16/15											48								
BETA .80 (1.00 = Market)											40								
2017-19 PROJECTIONS											32								
Price	Gain	Ann'l Total Return									24								
High 35	25 (-5%)	3%									20								
Low 25	(-30%)	-4%									16								
Insider Decisions											12								
F M A M J J A S O											8								
to Buy	0 0 0 0 0 0 0 0 0										6								
Options	0 0 0 0 0 0 0 0 0																		
to Sell	0 0 0 0 6 0 1 1 0																		
Institutional Decisions																			
1Q2014 2Q2014 3Q2014																			
to Buy	118 97 99																		
to Sell	76 92 107																		
Hld's(000)	41191 40836 41104																		
Percent shares traded	18 12 6																		
% TOT. RETURN 12/14																			
THIS STOCK	VL ARITH. INDEX																		
1 yr. 30.5	6.9																		
3 yr. 56.5	73.7																		
5 yr. 105.2	107.3																		
© VALUE LINE PUB. LLC 17-19																			
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh	28.25
91.07	221.75	167.59	126.17	20.41	23.24	23.76	27.98	28.68	26.80	30.77	27.58	27.29	27.73	25.86	26.94	23.70	25.00	"Cash Flow" per sh	5.25
3.47	2.28	3.31	2.71	2.19	2.63	2.35	2.72	4.27	2.93	3.98	4.45	3.62	3.78	3.70	4.36	4.50	4.65	Earnings per sh ^A	2.25
1.28	.12	1.76	1.20	.67	1.02	.73	.92	1.47	.72	1.36	1.58	1.65	1.72	1.32	1.85	1.95	2.00	Div'd Decl'd per sh ^B	1.50
1.05	.48	.48	.48	.48	.49	.52	.55	.57	.60	.69	.81	1.00	1.10	1.16	1.22	1.27	1.32	Cap'l Spending per sh	6.00
2.70	3.30	4.24	5.92	1.74	2.21	2.47	3.23	3.14	4.04	4.09	3.86	3.64	4.20	4.61	5.05	5.90	5.85	Book Value per sh ^C	26.75
11.76	10.69	15.34	15.12	14.84	15.54	15.54	15.87	17.46	17.27	18.30	19.17	19.71	20.30	21.06	21.61	23.90	24.80	Common Shs Outst'g ^D	64.50
40.45	35.65	47.21	47.63	48.04	48.34	48.47	48.59	52.51	52.91	54.49	54.84	57.12	58.42	59.81	60.08	62.25	63.00	Avg Ann'l P/E Ratio	14.0
16.5	NMF	13.6	13.7	19.3	13.8	24.4	19.4	15.4	30.9	15.0	11.4	12.7	14.1	19.3	14.6	16.3	16.3	Relative P/E Ratio	.90
.86	NMF	.88	.70	1.05	.79	1.29	1.03	.83	1.64	.90	.76	.81	.88	1.23	.82	.85	.85	Avg Ann'l Div'd Yield	4.8%
5.0%	2.8%	2.0%	2.9%	3.7%	3.5%	2.9%	3.0%	2.5%	2.7%	3.4%	4.5%	4.8%	4.5%	4.6%	4.5%	4.0%	4.0%		
CAPITAL STRUCTURE as of 9/30/14																		1825	
Total Debt \$1510.9 mill. Due in 5 Yrs \$528.2 mill.	1151.6	1359.6	1506.3	1417.8	1676.8	1512.6	1558.7	1619.8	1547.0	1618.5	1475	1575	1575	1575	1575	1575	1575	Revenues (\$mill)	1825
LT Debt \$1463.8 mill. LT Interest \$73.2 mill.	37.8	47.2	75.1	38.5	73.6	87.1	92.4	100.2	78.2	111.1	120	125	125	125	125	125	125	Net Profit (\$mill)	145
Incl. \$51.5 mill. debt to affiliated trusts.	36.4%	35.4%	35.9%	38.7%	38.3%	34.3%	35.0%	35.4%	34.4%	36.0%	36.5%	36.5%	36.5%	36.5%	36.5%	36.5%	36.5%	Income Tax Rate	36.5%
(LT interest earned: 3.6x)	3.7%	3.6%	3.9%	22.4%	14.0%	4.2%	4.0%	5.2%	8.3%	8.8%	10.0%	9.0%	9.0%	9.0%	9.0%	9.0%	9.0%	AFUDC % to Net Profit	8.0%
Leases, Uncapitalized Annual rentals \$6.7 mill.	56.5%	58.0%	53.7%	41.0%	48.1%	50.9%	51.6%	51.4%	50.8%	51.4%	50.0%	49.0%	49.0%	49.0%	49.0%	49.0%	49.0%	Long-Term Debt Ratio	51.0%
Pension Assets-12/13 \$481.5 mill.	41.9%	40.6%	46.3%	59.0%	51.9%	49.1%	48.4%	48.6%	49.2%	48.6%	50.0%	51.0%	51.0%	51.0%	51.0%	51.0%	51.0%	Common Equity Ratio	49.0%
Oblig. \$527.0 mill.	1796.2	1900.8	1980.1	1548.9	1919.5	2139.0	2325.3	2439.9	2561.2	2669.7	2990	3070	3070	3070	3070	3070	3070	Total Capital (\$mill)	3525
Pfd Stock None	1956.1	2126.4	2215.0	2351.3	2492.2	2607.0	2714.2	2860.8	3023.7	3202.4	3520	3720	3720	3720	3720	3720	3720	Net Plant (\$mill)	4275
Common Stock 62,239,441 shs. as of 10/31/14	4.3%	4.8%	6.1%	5.2%	5.8%	5.5%	5.4%	5.5%	4.3%	5.4%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	Return on Total Cap'l	5.5%
MARKET CAP: \$2.3 billion (Mid Cap)	4.8%	5.9%	8.2%	4.2%	7.4%	8.3%	8.2%	8.5%	6.2%	8.6%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	Return on Shr. Equity	8.5%
	4.7%	5.9%	8.0%	4.2%	7.4%	8.3%	8.2%	8.5%	6.2%	8.6%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%	Return on Com Equity ^E	8.5%
	1.4%	2.4%	4.9%	.8%	3.7%	4.1%	3.3%	3.1%	.8%	2.9%	3.0%	3.0%	3.0%	3.0%	3.0%	3.0%	3.0%	Retained to Com Eq	3.0%
	72%	60%	40%	82%	50%	51%	60%	64%	88%	66%	65%	65%	65%	65%	65%	65%	65%	All Div'ds to Net Prof	66%
ELECTRIC OPERATING STATISTICS																			
	2011	2012	2013																
% Change Retail Sales (KWH)	+2.0	-1.8	+4																
Avg. Indust. Use (MWH)	1558	1505	1428																
Avg. Indust. Revs. per KWH (\$)	5.71	5.69	5.74																
Capacity at Peak (MW)	2923	3080	2767																
Peak Load, Winter (MW)	2381	2485	2223																
Annual Load Factor (%)	61.0	58.0	59.0																
% Change Customers (rent)	+4	+6	+1.1																
BUSINESS: Avista Corporation (formerly The Washington Water Power Company) supplies electricity & gas in eastern Washington & northern Idaho. Supplies electricity to part of Alaska & gas to part of Oregon. Customers: 383,000 electric, 326,000 gas. Acq'd Alaska Electric Light and Power 7/14. Sold Ecova energy-management sub. 6/14. Electric rev. breakdown: residential, 32%; commercial, 28%; industrial, 11%; wholesale, 12%; other, 17%. Generating sources: hydro, 27%; gas, 14%; coal, 9%; wood waste, 2%; purchased, 48%. Fuel costs: 43% of revs. '13 reported deprec. rate (utility): 2.9%. Has 1,800 employees. Chairman, President & CEO: Scott L. Morris, Inc.: WA. Address: 1411 E. Mission Ave., Spokane, WA 99202-2600. Tel.: 509-489-0500. Web: www.avistacorp.com.																			
Avista's regulatory settlement was approved in Washington. Electric and gas rates were raised by \$12.3 million (2.5%) and \$8.5 million (5.6%), respectively, at the start of 2015. The order didn't address the cost of capital, but it did decouple revenues and volume. Accordingly, top-line advances will now track customer growth (currently at about 1% for electricity and gas), instead of sales changes.																			
Avista has reached a settlement of its gas rate case in Oregon. If approved by the state regulatory commission, rates will be raised (effective March 1st) by \$5.0 million (5.1%), based on a 9.5% return on a 51% common-equity ratio.																			
More rate applications are probably on the way. Avista will likely file cases in Washington and Idaho for new tariffs in 2016. Alaska Electric Light and Power, which the company acquired in mid-2014, is also considering filing a petition.																			
We estimate that earnings will increase slightly in 2015. Avista should benefit from rate relief and a full year of income from the Alaska utility acquisition. On the other hand, a favorable swing in power costs helped Avista in Washington																			
in 2014, and we do not assume that this will happen this year. Our 2015 earnings estimate is within the company's targeted range of \$1.86-\$2.06 a share.																			
Avista has repurchased some stock, and might buy back more. Through mid-December, the company repurchased 2.5 million shares for \$79.9 million. The board authorized a buyback for up to 800,000 more shares in the first quarter of 2015. Later this year, however, Avista will need some equity, so the company expects to issue about \$30 million. The company's financing needs also include about \$100 million of long-term debt.																			
We expect a dividend increase this quarter. That has been the pattern in recent years. We estimate that the board of directors will boost the annual payout by \$0.05 a share (3.9%). Avista is targeting yearly dividend growth of 4%-5%.																			
Avista stock offers a dividend yield that is slightly above the utility mean. Like several utility stocks, the recent price is above the upper end of our 2017-2019 Target Price Range. Accordingly, total return potential is low.																			
Paul E. Debbas, CFA January 30, 2015																			
ANNUAL RATES																			
	Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'13																
of change (per sh)																			
Revenues	-7.0%	-1.5%	1.0%																
"Cash Flow"	4.5%	1.0%	5.0%																
Earnings	5.5%	6.5%	5.5%																
Dividends	9.0%	13.5%	4.5%																
Book Value	3.5%	3.5%	4.0%																
QUARTERLY REVENUES (\$ mill.)																			
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year														
2011	476.6	360.6	343.7	438.9	1619.8														
2012	452.3	343.6	340.6	410.5	1547.0														
2013	482.9	352.0	335.9	447.7	1618.5														
2014	446.6	312.6	301.6	414.2	1475														
2015	490	335	325	425	1575														
EARNINGS PER SHARE ^A																			
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year														
2011	.73	.39	.18	.42	1.72														
2012	.65	.31	.10	.26	1.32														
2013	.71	.43	.19	.53	1.85														
2014	.79	.43	.16	.57	1.95														
2015	.85	.45	.15	.55	2.00														
QUARTERLY DIVIDENDS PAID ^B																			
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year														
2011	.275	.275	.275	.275	1.10														
2012	.29	.29	.29	.29	1.16														
2013	.305	.305	.305	.305	1.22														
2014	.3175	.3175	.3175	.3175	1.27														
2015																			
Company's Financial Strength																			
A																			
Stock's Price Stability																			
95																			
Price Growth Persistence																			
60																			
Earnings Predictability																			
75																			
To subscribe call 1-800-VALUELINE																			

(A) Dil. EPS. Excl. nonrec. gain (losses): '00, (27¢); '02, (9¢); '03, (3¢); '14, 9¢; gains (losses) on disc. ops.: '01, (\$1.00); '02, 2¢; '03, (10¢); '14, \$1.17. '13 EPS don't add due to rounding. Next egs. due late Feb. (B) Div'ds histor. paid in mid-Mar., June, Sept. & Dec. Div'd rev. plan avail. (C) Incl. def'd chgs. in '13: \$8.08/sh. (D) in mill. (E) Rate base: Net orig. cost. Rate all'd on com. eq. in WA in '15: none; in ID in '13: 9.8%; in OR in '14: 9.65%; earn. on avg. com. eq., '13: 8.7%. Reg. Clm.: WA, Avg.; ID, Above Avg. (F) Summer pk. '12.

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BLACK HILLS CORP. NYSE:BKH				RECENT PRICE	51.40	P/E RATIO	18.2 (Trailing: 20.2; Median: 17.0)	RELATIVE P/E RATIO	0.99	DIV'D YLD	3.1%	VALUE LINE								
TIMELINESS 1	Raised 12/12/14	High:	33.5	32.5	44.6	37.9	45.4	44.0	28.0	34.5	34.8	37.0	55.1	62.1	67.1	Target Price Range	2017	2018	2019	
SAFETY 3	Lowered 8/15/03	Low:	21.8	26.5	29.2	32.5	35.4	21.7	14.5	25.7	25.8	30.3	36.9	47.1						
TECHNICAL 3	Raised 1/9/15	LEGENDS — 0.88 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession																		
BETA .90	(1.00 = Market)	2017-19 PROJECTIONS Price Gain Ann'l Total High 60 (+1.5%) 7% Low 40 (-2.0%) -2%																		
Insider Decisions			F M A M J J A S O to Buy 0 Options 0 to Sell 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0																	
Institutional Decisions			1Q2014 2Q2014 3Q2014 to Buy 94 85 99 to Sell 96 103 105 Hld's(000) 31901 32363 32908 Percent shares traded 18 12 6																	
© VALUE LINE PUB. LLC 17-19 1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 31.48 37.05 69.69 57.96 15.74 35.17 34.54 41.97 19.69 18.41 26.03 32.58 33.29 28.96 26.55 28.67 30.75 30.65 2.72 2.88 3.68 5.27 4.93 4.26 4.46 4.81 5.04 5.29 2.95 5.41 4.88 4.01 5.59 5.93 6.40 6.55 1.60 1.70 2.37 3.42 2.33 1.84 1.74 2.11 2.21 2.68 .18 2.32 1.66 1.01 1.97 2.61 2.90 2.85 1.00 1.04 1.08 1.12 1.16 1.20 1.24 1.28 1.32 1.37 1.40 1.42 1.44 1.46 1.48 1.52 1.56 1.60 1.18 4.89 5.79 14.07 8.65 2.80 2.80 4.18 9.24 6.92 8.51 8.90 12.04 10.03 7.90 7.97 9.35 9.60 9.58 10.14 11.95 18.95 19.66 21.72 22.43 22.29 23.68 25.66 27.19 27.84 28.02 27.53 27.88 29.39 30.70 31.90 21.58 21.37 23.30 26.89 26.93 32.30 32.48 33.16 33.37 37.00 38.64 38.97 39.27 43.92 44.21 44.50 44.75 45.00 14.9 13.6 10.9 11.4 12.5 15.9 17.1 17.3 15.8 15.0 NMF 9.9 18.1 NMF 17.1 18.2 19.0 .77 .78 .71 .58 .68 .91 .90 .92 .85 .80 NMF .66 1.15 NMF 1.09 1.03 1.00 4.2% 4.5% 4.2% 2.9% 4.0% 4.1% 4.2% 3.5% 3.8% 3.4% 4.2% 6.2% 4.8% 4.6% 4.4% 3.2% 2.8% Revenues per sh 33.50 "Cash Flow" per sh 7.50 Earnings per sh ^A 3.25 Div'd Decl'd per sh ^B 1.85 Cap'l Spending per sh 8.25 Book Value per sh ^C 35.75 Common Shs Outstg' ^D 45.75 Avg Ann'l P/E Ratio 15.5 Relative P/E Ratio .95 Avg Ann'l Div'd Yield 3.7%																				
CAPITAL STRUCTURE as of 9/30/14				1121.7 1391.6 656.9 695.9 1005.8 1269.6 1307.3 1272.2 1173.9 1275.9 1375 1380 Total Debt \$1566.5 mill. Due in 5 Yrs \$459.0 mill. LT Debt \$1107.5 mill. LT Interest \$57.6 mill. (LT interest earned: 4.1x) Leases, Uncapitalized Annual rentals \$2.8 mill.															Revenues (\$mill) 1530 Net Profit (\$mill) 145	
Pension Assets-12/13 \$280.4 mill.				57.2 70.3 74.0 100.1 6.8 89.7 64.6 40.4 86.9 115.8 130 130 31.8% 33.8% 31.3% 31.3% 33.1% 30.7% 26.4% 31.1% 35.5% 34.7% 33.5% 34.5% .3% 1.0% 9.7% 14.8% 173.2% 20.1% 28.0% 65.0% 5.4% 2.4% 2.0% 2.0% 49.9% 47.6% 44.3% 36.8% 32.3% 48.4% 51.9% 51.4% 43.2% 51.6% 53.0% 52.0% 49.6% 52.4% 55.7% 63.2% 67.7% 51.6% 48.1% 48.6% 56.8% 48.4% 47.0% 48.0% 1469.3 1409.1 1418.4 1534.2 1551.8 2100.7 2286.3 2489.7 2171.4 2704.7 2910 2995 1445.7 1435.4 1646.4 1823.5 2022.2 2160.7 2495.4 2789.6 2742.7 2990.3 3255 3520 5.3% 6.6% 6.8% 7.9% 1.6% 5.9% 4.4% 3.3% 5.5% 5.5% 5.5% 5.5% 7.8% 9.5% 9.4% 10.3% .7% 8.3% 5.9% 3.3% 7.1% 8.9% 9.5% 9.0% 7.8% 9.5% 9.4% 10.3% .7% 8.3% 5.9% 3.3% 7.1% 8.9% 9.5% 9.0% 2.3% 3.8% 3.8% 5.1% NMF 3.2% .7% NMF 1.8% 3.7% 4.5% 4.0% 71% 60% 59% 50% NMF 62% 87% NMF 75% 58% 53% 50%															Income Tax Rate 34.5% AFUDC % to Net Profit 2.0% Long-Term Debt Ratio 53.5% Common Equity Ratio 46.5% Total Capital (\$mill) 3500 Net Plant (\$mill) 4150 Return on Total Cap'l 5.5% Return on Shr. Equity 9.0% Return on Com Equity ^E 9.0% Retained to Com Eq 4.0% All Div'ds to Net Prof 57%	
Pfd Stock None				1469.3 1409.1 1418.4 1534.2 1551.8 2100.7 2286.3 2489.7 2171.4 2704.7 2910 2995 1445.7 1435.4 1646.4 1823.5 2022.2 2160.7 2495.4 2789.6 2742.7 2990.3 3255 3520															Total Capital (\$mill) 3500 Net Plant (\$mill) 4150	
Common Stock 44,655,369 shs. as of 10/31/14				5.3% 6.6% 6.8% 7.9% 1.6% 5.9% 4.4% 3.3% 5.5% 5.5% 5.5% 5.5% 7.8% 9.5% 9.4% 10.3% .7% 8.3% 5.9% 3.3% 7.1% 8.9% 9.5% 9.0% 7.8% 9.5% 9.4% 10.3% .7% 8.3% 5.9% 3.3% 7.1% 8.9% 9.5% 9.0% 2.3% 3.8% 3.8% 5.1% NMF 3.2% .7% NMF 1.8% 3.7% 4.5% 4.0% 71% 60% 59% 50% NMF 62% 87% NMF 75% 58% 53% 50%															Return on Total Cap'l 5.5% Return on Shr. Equity 9.0% Return on Com Equity ^E 9.0% Retained to Com Eq 4.0% All Div'ds to Net Prof 57%	
MARKET CAP: \$2.3 billion (Mid Cap)				2.3% 3.8% 3.8% 5.1% NMF 3.2% .7% NMF 1.8% 3.7% 4.5% 4.0% 71% 60% 59% 50% NMF 62% 87% NMF 75% 58% 53% 50%															All Div'ds to Net Prof 57%	
ELECTRIC OPERATING STATISTICS				2011 2012 2013 % Change Retail Sales (KWH) +1.3 +2 +1.0 Avg. Indust. Use (MWH) 848.2 892.1 974.0 Avg. Indust. Revs. per KWH (\$) 7.58 8.01 8.19 Capacity at Yearend (Mw) 1315 1318 N/A Peak Load, Summer (Mw) 102.5 103.6 98.8 Annual Load Factor (%) N/A N/A N/A % Change Customers (yr-end) +.3 +.3 +.8															BUSINESS: Black Hills Corporation is a holding company for utilities that serve 204,000 electric customers in CO, SD, WY and MT, and 574,000 gas customers in NE, IA, KS, CO and WY. Mines coal & has a gas & oil E&P business. Acq'd Mallon Resources 3/03; Cheyenne Light 1/05; utility operations from Aquila 7/08. Discontinued telecom in '05; oil marketing in '06; gas marketing in '11. Electric revenue breakdown: res'l, 31%; comm'l, 36%; ind'l, 14%; wholesale, 11%; other, 8%. Generating sources: coal, 36%; other, 4%; purchased, 60%. Fuel costs: 41% of revs. '13 depr. rate: 3.5%. Has 1,900 empl's. Chairman, President & CEO: David R. Emery, Inc.: SD. Address: P.O. Box 1400, 625 Ninth St., Rapid City, SD 57701. Tel.: 605-721-1700. Internet: www.blackhillscorp.com.	
Fixed Charge Cov. (%)				160 205 224															The price of Black Hills stock has been significantly affected by the price of oil in the past two years. When oil prices were high in 2013, this equity was one of the top performers in the electric utility industry. In 2014, when oil prices declined precipitously, the share price rose just 1% in a year in which most utility issues fared extremely well. Oil and natural gas prices are continuing to decline. So far, Black Hills' oil and gas exploration and production subsidiary has not announced a cutback in its drilling or capital spending plans, but this might change when the company announces earnings in early February.	
ANNUAL RATES				Past Past Est'd '11-'13 of change (per sh) 10 Yrs. 5 Yrs. to '17-'19 Revenues -2.5% 5.5% 3.0% "Cash Flow" .5% 3.0% 6.5% Earnings -3.0% 2.0% 9.5% Dividends 2.5% 1.5% 3.5% Book Value 3.5% 2.0% 4.0%															The utility received rate increases in two states. In Kansas, the commission approved a "black box" settlement (i.e., no specified return on equity) calling for a \$5.2 million raise in gas rates. In Colorado, electric rates were raised by \$3 million, based on a return of 9.83% on a common-equity ratio of 50.17%. Each tariff hike took effect at the start of the new year. Black Hills is awaiting a final order in its electric rate case in South Dakota, in which the utility sought an increase of \$14.6 million, based on a 10.25% return on equity.	
QUARTERLY REVENUES (\$ mill.)				Cal- Full endar Mar.31 Jun.30 Sep.30 Dec.31 Year 2011 400.8 260.7 249.5 361.2 1272.2 2012 365.8 242.4 246.8 318.9 1173.9 2013 380.7 279.8 259.9 355.5 1275.9 2014 460.2 283.2 272.1 359.5 1375 2015 430 290 280 380 1380															We expect a dividend increase in the current quarter. A first-period hike in the disbursement has been the practice of the board of directors for many years. We estimate that the board will boost the quarterly dividend by a cent a share (2.6%). The company's payout ratio is low enough to allow for an increase, despite the possibility of lower earnings in 2015.	
EARNINGS PER SHARE ^A				Cal- Full endar Mar.31 Jun.30 Sep.30 Dec.31 Year 2011 .73 .09 d.29 .44 1.01 2012 .80 .11 .38 .68 1.97 2013 .97 .69 .52 .43 2.61 2014 1.08 .44 .60 .78 2.90 2015 1.00 .45 .60 .80 2.85															This timely stock has a dividend yield that is a cut below the utility mean. It does not stand out for its 3- to 5-year total return potential.	
QUARTERLY DIVIDENDS PAID ^B				Cal- Full endar Mar.31 Jun.30 Sep.30 Dec.31 Year 2011 .365 .365 .365 .365 1.46 2012 .37 .37 .37 .37 1.48 2013 .38 .38 .38 .38 1.52 2014 .39 .39 .39 .39 1.56 2015															Paul E. Debbas, CFA January 30, 2015	
QUARTERLY DIVIDENDS PAID ^B				Cal- Full endar Mar.31 Jun.30 Sep.30 Dec.31 Year 2011 .365 .365 .365 .365 1.46 2012 .37 .37 .37 .37 1.48 2013 .38 .38 .38 .38 1.52 2014 .39 .39 .39 .39 1.56 2015															Company's Financial Strength B+ Stock's Price Stability 85 Price Growth Persistence 65 Earnings Predictability 40	

(A) Diluted EPS. Excl. nonrec. gains (losses): '05, (99¢); '08, (\$1.55); '09, (28¢); '10, 10¢; '12, 4¢ net; gains (losses) on disc. ops.; '05, (7¢); '06, 21¢; '07, (4¢); '08, \$4.12; '09, 7¢; '11, 23¢; '12, (16¢); '11, '12 EPS don't add due to chng. in shs. or rounding. Next eqs. due early Feb. (B) Div'd paid early Mar., Jun., Sept., & Dec. (C) Div'd reinv. plan avail. (D) Incl. def'd chgs. in '13: \$11.12/sh. (D) In mill. (E) Rate base: Net orig. cost. Rate all'd on com. eq. in SD in '13: none specified; in CO in '15: 9.83%; earned on avg. com. eq., '13: 9.1%. Regul. Climate: Avg.

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CLECO CORPORATION NYSE-CNL		RECENT PRICE	53.86	P/E RATIO	21.0 (Trailing: 20.6 Median: 14.0)	RELATIVE P/E RATIO	1.14	DIV'D YLD	3.0%	VALUE LINE									
TIMELINESS — Suspended 10/31/14	High: 18.4	20.8	24.4	26.2	29.8	28.4	28.1	31.8	38.3	45.3	50.4	59.2	Target Price Range	2017	2018	2019			
SAFETY 1 Raised 6/22/12	Low: 11.0	16.2	18.9	20.5	22.1	17.3	18.7	24.3	30.1	36.2	40.4	45.5							
TECHNICAL — Suspended 10/31/14	LEGENDS 0.89 x Dividends p sh divided by Interest Rate Relative Price Strength 2-for-1 split 5/01 Options: Yes Shaded area indicates recession																		
BETA .80 (1.00 = Market)																			
2017-19 PROJECTIONS																			
Price	Gain	Ann'l Total Return																	
High 50	(-5%)	2%																	
Low 45	(-15%)	-2%																	
Insider Decisions																			
J F M A M J J A S																			
to Buy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Options	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
to Sell	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Institutional Decisions																			
10Q2014	2Q2014	3Q2014																	
to Buy	103	114	106																
to Sell	86	112	122																
Hld's(000)	44490	44575	44513																
Percent shares traded																			
1 yr. 21.1 3 yr. 63.0 5 yr. 147.1 THIS STOCK INDEX VL ARITH. INDEX 8.0 72.4 119.8																			
© VALUE LINE PUB. LLC 17-19																			
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh	24.00
11.46	17.12	18.23	23.55	15.33	18.54	15.03	18.41	17.38	17.19	17.99	14.17	18.98	18.53	16.46	18.14	21.10	21.50	"Cash Flow" per sh	6.50
2.28	2.36	2.77	2.94	3.05	2.98	2.56	2.76	2.63	2.69	3.71	3.78	5.12	5.28	5.40	5.32	5.45	5.30	Earnings per sh ^A	3.00
1.12	1.19	1.46	1.51	1.52	1.26	1.32	1.42	1.36	1.32	1.70	1.76	2.29	2.59	2.70	2.85	2.70	2.35	Div'd Decl'd per sh ^B	2.00
.81	.83	.85	.87	.90	.90	.90	.90	.90	.90	.90	.90	.98	1.12	1.30	1.43	1.56	1.60	Cap'l Spending per sh	3.00
2.03	3.99	2.52	1.10	1.91	1.58	1.61	3.19	4.11	8.51	5.59	4.15	4.68	3.25	4.06	3.12	3.55	2.60	Book Value per sh ^C	30.50
9.07	9.44	10.04	10.69	11.77	10.09	10.83	13.69	15.22	16.85	17.65	18.50	21.76	23.55	24.84	26.24	27.20	27.95	Common Shs Outst'g ^D	60.50
44.97	44.88	44.99	44.96	47.04	47.18	49.62	49.99	57.57	59.94	60.04	60.26	60.53	60.29	60.36	60.45	60.40	60.50	Avg Ann'l P/E Ratio	16.0
14.4	13.4	13.2	14.6	12.2	12.4	13.8	15.0	17.3	19.6	14.1	13.2	12.3	13.3	15.0	17.3	17.3	17.3	Relative P/E Ratio	1.00
.75	.76	.86	.75	.67	.71	.73	.80	.93	1.04	.85	.88	.78	.83	.95	.97	.97	.97	Avg Ann'l Div'd Yield	4.2%
5.0%	5.2%	4.4%	3.9%	4.8%	5.8%	5.0%	4.2%	3.8%	3.5%	3.8%	3.9%	3.5%	3.3%	3.2%	3.1%	3.1%	3.1%	<i>Bold figures are Value Line estimates</i>	
CAPITAL STRUCTURE as of 9/30/14																			
Total Debt \$1338.4 mill. Due in 5 Yrs \$453.8 mill.																			
LT Debt \$1320.2 mill. LT Interest \$72.7 mill.																			
Incl. \$6.9 million capitalized leases.																			
(LT Interest earned: 4.4x)																			
Leases, Uncapitalized Annual rentals \$10.6 mill.																			
Pension Assets-12/13 \$384.6 mill.																			
Oblig. \$392.5 mill.																			
Pfd Stock None																			
Common Stock 60,377,666 shs. as of 10/22/14																			
MARKET CAP: \$3.3 billion (Mid Cap)																			
ELECTRIC OPERATING STATISTICS																			
	2011	2012	2013																
% Change Retail Sales (KWH)	+4	-3.4	+1.4																
Avg. Indust. Use (MWH)	3,904	3,814	3,870																
Avg. Indust. Revs. per KWH (\$)	7.56	6.83	7.50																
Capacity at Peak (Mw)	2,544	3,315	3,315																
Peak Load, Summer (Mw)	2,355	2,282	2,278																
Annual Load Factor (%)	56.2	55.1	57.0																
% Change Customers (avg.)	+6	+6	+6																
Fixed Charge Cov. (%)	415	326	360																
ANNUAL RATES																			
	Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'13 of change (per sh)																
Revenues	-1.0%	--	5.0%																
"Cash Flow"	6.0%	12.0%	3.5%																
Earnings	6.5%	12.5%	2.0%																
Dividends	3.5%	7.5%	7.5%																
Book Value	8.5%	8.5%	3.5%																
Cal-endar	QUARTERLY REVENUES (\$ mill.)				Full Year														
	Mar.31	Jun.30	Sep.30	Dec.31															
2011	253.7	272.9	351.6	239.1	1117.3														
2012	222.8	240.1	297.4	233.4	993.7														
2013	240.9	263.9	328.8	263.1	1096.7														
2014	284.4	309.1	371.4	310.1	1275														
2015	280	315	390	315	1300														
Cal-endar	EARNINGS PER SHARE ^A				Full Year														
	Mar.31	Jun.30	Sep.30	Dec.31															
2011	.48	.52	1.08	.51	2.59														
2012	.50	.77	1.05	.38	2.70														
2013	.45	.69	1.09	.41	2.65														
2014	.43	.60	1.17	.50	2.70														
2015	.35	.55	1.10	.35	2.35														
Cal-endar	QUARTERLY DIVIDENDS PAID ^B				Full Year														
	Mar.31	Jun.30	Sep.30	Dec.31															
2010	.225	.25	.25	.25	.98														
2011	.25	.28	.28	.3125	1.12														
2012	.3125	.3125	.3375	.3375	1.30														
2013	.3375	.3625	.3625	.3625	1.43														
2014	.3625	.40	.40	.40															
BUSINESS: Cleco Corporation is a holding company for Cleco Power LLC, which supplies electricity to about 284,000 customers in central Louisiana. Electric revenue breakdown: residential, 46%; commercial, 30%; industrial, 14%; other, 10%. Largest industrial customers are paper mills and other wood-product industries. Generating sources: gas & oil, 29%; coal & lignite, 28%; petroleum																			
coke, 27%; purchased, 16%. Fuel costs: 34% of revenues. '13 reported depreciation rate (utility): 2.7%. Has 1,200 employees. Chairman: J. Patrick Garrett. President & CEO: Bruce A. Williamson. Incorporated: Louisiana. Address: 2030 Donahue Ferry Road, P.O. Box 5000, Pineville, Louisiana 71361-5000. Telephone: 318-484-7400. Internet: www.cleco.com.																			
Cleco has accepted a takeover offer.																			
The bid came as no surprise. In June, after rumors came out that the company was a target, Cleco announced that it had retained financial and legal advisors in response to a prospective buyer's expression of interest. An investor group led by Macquarie Infrastructure Partners and British Columbia Investment Management has agreed to pay \$55.37 a share in cash for each Cleco share. The acquisition requires the approval of Cleco shareholders, the Louisiana Public Service Commission, and the Federal Energy Regulatory Commission. The company expects the transaction to be completed in the second half of 2015. (Note that a dividend hike appears unlikely as long as the deal is pending.) Due to the takeover agreement, we have suspended the Timeliness rank of Cleco stock.																			
We advise stockholders to sell their shares on the open market.																			
The offer is very generous, at more than 20 times estimated 2015 earnings. However, with the recent price just 3% below the buyout price, there is little upside potential for investors. By selling now, shareholders can																			
avoid the risk that the deal fails to win regulatory approval. This frequently happens in the electric utility industry, although we note that Macquarie has completed three domestic utility acquisitions (two electric and one water).																			
Earnings are likely to decline in 2015.																			
Next year will be the first full year under Cleco's new formula rate plan. The new plan cut the utility's allowed return on equity significantly. This will have a far greater effect on earnings than we had estimated. The tax rate will probably be higher than in 2014. Putting it all together, we have cut our 2015 profit forecast by \$0.50 a share, to \$2.35. Our revised estimate is within Cleco's guidance of \$2.28-\$2.38 a share. Note that the company is excluding any deal-related expenses from this range, but we will include them in our earnings presentation.																			
Finances are solid.																			
The fixed-charge coverage and common-equity ratio are above average for this industry. The utility should have no trouble financing its capital budget. All told, Cleco merits a Financial Strength rating of A.																			
Paul E. Debbas, CFA December 19, 2014																			

(A) Diluted earnings. Excl. nonrec. gains (losses): '00, 5¢; '02, (5¢); '03, (\$2.05); '05, \$2.11; '07, \$1.22; '10, \$1.91; '11, 63¢; losses from discount. ops.: '00, 14¢; '01, 4¢. '13 EPS

don't add due to rounding. Next earnings report due early Feb. (B) Div'ds historically paid in mid-Feb., May, Aug. and Nov. Div'd reinvestment plan avail. (C) Incl. deferred charges. In

'13: \$10.13/sh. (D) In mill., adj. for split. (E) Rate base: Net orig. cost. Rate allowed on com. eq. in '14: 11.24%; earned on avg. com. eq., '13: 10.4%. Regulatory Climate: Average.

Company's Financial Strength	A
Stock's Price Stability	95
Price Growth Persistence	85
Earnings Predictability	80

CMS ENERGY CORP. NYSE-CMS										RECENT PRICE	P/E RATIO		RELATIVE P/E RATIO		DIV'D YLD	VALUE LINE				
										34.01	20.6 (Trailing: 19.3) Median: 14.0		1.11		3.4%					
TIMELINESS	3	Lowered 12/5/14		High: 10.7 Low: 3.4		10.6	16.8	17.0	19.5	17.5	16.1	19.3	22.4	25.0	30.0	34.1	Target Price Range	2017	2018	2019
SAFETY	2	Raised 3/21/14		LEGENDS		0.80% Dividends p sh divided by Interest Rate														
TECHNICAL	4	Lowered 11/14/14		Relative Price Strength		Options: Yes														
BETA	.70	(1.00 = Market)		Shaded area indicates recession																
2017-19 PROJECTIONS																				
Ann'l Total																				
Price Gain Return																				
High 35 (+5%) 4%																				
Low 25 (-25%) -3%																				
Insider Decisions																				
J F M A M J J A S																				
to Buy 0 0 0 0 0 0 0 0 0																				
Options 0 0 0 0 0 0 0 0 0																				
to Sell 0 2 1 1 0 0 0 0 4																				
Institutional Decisions																				
10/2014 2Q2014 3Q2014																				
to Buy 193 177 174																				
to Sell 177 187 196																				
Hld's(000) 237528 234703 237560																				
Percent shares traded																				
30																				
20																				
10																				
© VALUE LINE PUB. LLC 17-19																				
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh	27.50	
47.56	52.59	74.24	72.16	60.28	34.21	28.06	28.52	30.57	28.95	30.13	27.23	25.77	25.59	23.90	24.68	26.20	25.25	"Cash Flow" per sh	5.25	
6.60	7.87	7.61	5.24	d.09	2.39	2.87	3.43	3.22	3.08	3.88	3.47	3.70	3.65	3.82	4.06	4.20	4.45	Earnings per sh ^A	2.25	
2.24	2.85	2.53	1.27	d2.99	d.29	.74	1.10	.64	.64	1.23	.93	1.33	1.45	1.53	1.66	1.75	1.85	Div'd Decl'd per sh ^B	1.35	
1.26	1.39	1.46	1.46	1.09	--	--	--	--	.20	.36	.50	.66	.84	.96	1.02	1.08	1.14	Cap'l Spending per sh	5.25	
11.98	9.69	8.51	9.49	5.18	3.32	2.69	2.69	3.01	5.61	3.50	3.59	3.29	3.47	4.65	4.98	6.05	5.55	Book Value per sh ^C	17.25	
20.63	21.17	19.48	14.21	7.86	9.84	10.63	10.53	10.03	9.46	10.88	11.42	11.19	11.92	12.09	12.98	13.40	14.25	Common Shs Outstg ^D	283.00	
108.11	116.04	121.20	132.99	144.10	161.13	195.00	220.50	222.78	225.15	226.41	227.89	249.60	254.10	264.10	266.10	275.00	277.00	Avg Ann'l P/E Ratio	13.5	
19.9	13.9	9.6	20.8	--	--	12.4	12.6	22.2	26.8	10.9	13.6	12.5	13.6	15.1	16.3	16.3	16.3	Relative P/E Ratio	.85	
1.03	.79	.62	1.07	--	--	.66	.67	1.20	1.42	.66	.91	.80	.85	.96	.92	.92	.92	Avg Ann'l Div'd Yield	4.5%	
2.8%	3.5%	6.0%	5.5%	7.5%	--	--	--	--	1.2%	2.7%	4.0%	4.0%	4.3%	4.2%	3.8%	3.8%	3.8%	Bold figures are Value Line estimates		
CAPITAL STRUCTURE as of 9/30/14																				
Total Debt \$8861 mil. Due in 5 Yrs \$2985 mil.																				
LT Debt \$8171 mil. LT Interest \$420 mil.																				
Incl. \$129 mil. capitalized leases.																				
(LT interest earned: 2.9x)																				
Leases, Uncapitalized Annual rentals \$26 mil.																				
Pension Assets-12/13 \$1964 mil.																				
Oblig. \$2073 mil.																				
Pfd Stock \$37 mil. Pfd Div'd \$2 mil.																				
Incl. 373,148 shs. \$4.50 \$100 par, cum., callable at \$110.00.																				
Common Stock 275,100,000 shs.																				
MARKET CAP: \$9.4 billion (Large Cap)																				
ELECTRIC OPERATING STATISTICS																				
2011 2012 2013																				
% Change Retail Sales (KWH)																				
+4 +6 -3.1																				
Avg. Indust. Use (MWH)																				
10.86 11.13 10.00																				
Avg. Indust. Revs. per KWH (¢)																				
8.21 8.06 8.93																				
Capacity at Peak (Mw)																				
8588 8607 8693																				
Peak Load, Summer (Mw)																				
8930 9006 8909																				
Annual Load Factor (%)																				
50.8 48.7 52.5																				
% Change Customers (yr-end)																				
-1 - - +1																				
Fixed Charge Cov. (%)																				
237 268 282																				
ANNUAL RATES Past Past Est'd '11-'13																				
of change (per sh) 10 Yrs. 5 Yrs. to '17-'19																				
Revenues -8.0% -3.5% 2.0%																				
"Cash Flow" 4.5% 2.5% 5.5%																				
Earnings -- 13.0% 6.5%																				
Dividends 1.0% NMF 6.0%																				
Book Value 1.5% 4.0% 6.0%																				
QUARTERLY REVENUES (\$mill.)																				
Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year																				
2011 2055 1364 1464 1620 6503.0																				
2012 1802 1333 1507 1670 6312.0																				
2013 1979 1406 1445 1736 6566.0																				
2014 2523 1468 1430 1779 7200																				
2015 2200 1500 1500 1800 7000																				
EARNINGS PER SHARE ^A																				
Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year																				
2011 .51 .26 .53 .15 1.45																				
2012 .36 .37 .55 .25 1.53																				
2013 .53 .29 .46 .37 1.66																				
2014 .75 .30 .34 .36 1.75																				
2015 .55 .40 .55 .35 1.85																				
QUARTERLY DIVIDENDS PAID ^B																				
Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year																				
2010 .15 .15 .15 .21 .66																				
2011 .21 .21 .21 .21 .84																				
2012 .24 .24 .24 .24 .96																				
2013 .255 .255 .255 .255 1.02																				
2014 .27 .27 .27 .27																				
BUSINESS: CMS Energy Corporation is a holding company for Consumers Energy, which supplies electricity and gas to lower Michigan (excluding Detroit). Has 1.8 million electric, 1.7 million gas customers. Has 1,034 megawatts of nonregulated generating capacity. Sold Palisades nuclear plant in '07. Electric revenue breakdown: residential, 44%; commercial, 31%; industrial, 18%; other, 7%. Generating sources: coal, 46%; gas, 4%; other, 2%; purchased, 48%. Fuel costs: 51% of revenues. '13 reported deprec. rates: 3.5% electric, 2.8% gas, 7.0% other. Has 7,500 employees. Chairman: David W. Joos. President & CEO: John G. Russell. Incorporated: Michigan. Address: One Energy Plaza, Jackson, Michigan 49201. Tel.: 517-788-0550. Internet: www.cmsenergy.com.																				
CMS Energy's utility subsidiary has a gas rate case pending. Consumers Energy is seeking a tariff increase of \$88 million, based on a 10.7% return on equity. The utility is also seeking regulatory mechanisms that would recover certain expenditures currently (instead of having to wait to file a general rate case) and decouple revenues from volume. The staff of the Michigan Public Service Commission (MPSC) is recommending a boost of just \$15 million, based on a 10% ROE. Under state regulatory law, Consumers will self-implement an interim rate hike in early 2015. The MPSC's order is due in mid-2015.																				
Consumers is buying a gas-fired generating plant. The utility has agreed to pay \$155 million for a 540-megawatt facility. The purchase is scheduled for completion in late 2015. This will help offset the loss of capacity when Consumers retires 950 coal-fired megawatts in April of 2016.																				
Consumers has filed an electric rate application. The utility is seeking a hike of \$163 million, based on a 10.7% ROE. Consumers would self-implement an interim rate hike in mid-2015, and the MPSC's																				
decision would be due in late 2015, to coincide with the completion of the acquisition of the aforementioned gas-fired plant.																				
We expect steady earnings growth in 2014 and 2015. Rate relief, modest demand growth, and effective cost controls are benefiting the company. Note that our 2014 estimate of \$1.75 is a bit below the company's typically narrow earnings guidance of \$1.76-\$1.78 a share because CMS Energy is excluding a \$0.03-a-share charge that we have included in our presentation. The company has established a goal of 5%-7% annual profit growth, and we think CMS Energy will reach this objective this year and next.																				
We estimate that the board of directors will raise the quarterly dividend in early 2015. We forecast a hike of \$0.015 a share (5.6%) quarterly, the same increase as in each of the past two years.																				
CMS Energy stock has a dividend yield that is average for a utility. Like many utility issues, the recent price is near the upper end of our 2017-2019 Target Price Range. Accordingly, total return potential is minimal.																				
Paul E. Debbas, CFA December 19, 2014																				

(A) Diluted EPS. Excl. nonrec. gains (losses): '05, (\$1.61); '06, (\$1.08); '07, (\$1.26); '09, (7¢); '10, 3¢; '11, 12¢; '12, (14¢); gains (losses) on disc. ops.: '05, 7¢; '06, 3¢; '07, (40¢); '09, 8¢; '10, (8¢); '11, 1¢; '12, 3¢. '13 EPS don't add due to rounding. Next earnings report due late Jan. (B) Div's historically paid late Feb., May, Aug., & Nov. (C) Div'd reinvestment plan avail. (C) Incl. intang. In '13: \$5.75/sh. (D) In mill. (E) Company's Financial Strength B++ Stock's Price Stability 100 Price Growth Persistence 85 Earnings Predictability 70

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CON. EDISON NYSE:ED

RECENT PRICE **63.46** P/E RATIO **16.4** (Trailing: 15.3) RELATIVE P/E RATIO **0.90** DIV'D YLD **4.1%** VALUE LINE

TIMELINESS **3** Raised 11/15/13
SAFETY **1** New 7/27/90
TECHNICAL **3** Lowered 11/7/14
BETA .60 (1.00 = Market)

2017-19 PROJECTIONS
Price High 65 Low 55 Gain (NII) 5% (-15%) Ann'l Total Return 1%

Insider Decisions
to Buy 1 0 0 1 0 0 1 0 0
Options 0 0 0 0 0 0 0 0 0
to Sell 0 0 0 0 0 0 0 0 0

Institutional Decisions
4Q2013 1Q2014 2Q2014
to Buy 258 309 306
to Sell 283 249 262
Hrs's(000) 137375 141570 144306

Percent shares traded: 21, 14, 7

% TOT. RETURN 10/14
THIS STOCK 13.8
3 yr. 24.4
5 yr. 95.5
VL ARITH' INDEX 10.1
124.6

1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh	49.25
30.46	35.04	44.48	45.41	39.65	43.51	40.24	47.66	47.14	48.23	49.62	46.36	45.69	44.17	41.62	42.27	44.35	44.70	"Cash Flow" per sh	9.00
5.29	5.74	5.51	5.70	5.44	5.12	4.54	5.27	5.28	5.77	5.99	5.86	6.24	6.61	7.15	7.45	7.65	8.00	Earnings per sh ^A	4.25
3.04	3.13	2.74	3.21	3.13	2.83	2.32	2.99	2.95	3.48	3.36	3.14	3.47	3.57	3.86	3.93	3.90	3.95	Div'd Decl'd per sh ^B	2.75
2.12	2.14	2.18	2.20	2.22	2.24	2.26	2.28	2.30	2.32	2.34	2.36	2.38	2.40	2.42	2.46	2.52	2.58	Cap'l Spending per sh	9.50
2.66	3.17	4.52	5.20	5.68	5.72	5.80	6.59	7.17	7.09	8.50	7.80	6.96	6.72	7.06	8.67	9.70	10.25	Book Value per sh ^C	49.25
25.88	25.31	25.81	26.71	27.68	28.44	29.09	29.80	31.09	32.58	35.43	36.46	37.93	39.05	40.53	41.81	43.25	44.70	Common Shs Outst'g ^D	293.00
232.83	213.81	212.03	212.15	213.93	225.84	242.51	245.29	257.46	272.02	273.72	281.12	291.62	292.89	292.87	293.00	293.00	293.00	Avg Ann'l P/E Ratio	14.0
15.3	14.0	12.0	12.0	13.3	14.3	18.2	15.1	15.5	13.8	12.3	12.5	13.3	15.1	15.4	14.7	14.7	14.7	Relative P/E Ratio	.90
.80	.80	.78	.61	.73	.82	.96	.80	.84	.73	.74	.83	.85	.95	.98	.83	.83	.83	Avg Ann'l Div'd Yield	4.6%
4.6%	4.9%	6.6%	5.7%	5.3%	5.5%	5.3%	5.0%	5.0%	4.8%	5.7%	6.0%	5.2%	4.5%	4.1%	4.3%	4.3%	4.3%		

1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues (\$mill)	14450
9758.0	11690	12137	13120	13583	13032	13325	12938	12188	12381	13000	13100	12938	12188	12381	13000	13100	12938	Net Profit (\$mill)	1265
560.0	719.0	749.0	936.0	933.0	868.0	992.0	1062.0	1141.0	1157.0	1145	1170	1157.0	1141.0	1157.0	1145	1170	1157.0	Income Tax Rate	34.0%
34.3%	33.6%	35.2%	32.6%	36.0%	34.2%	36.0%	36.1%	34.5%	31.8%	34.0%	34.0%	34.0%	34.0%	31.8%	34.0%	34.0%	34.0%	AFUDC % to Net Profit	1.0%
7.7%	2.2%	1.6%	1.9%	1.7%	2.6%	2.4%	1.6%	5%	5%	1.0%	1.0%	1.0%	1.0%	5%	5%	1.0%	1.0%	Long-Term Debt Ratio	49.0%
47.4%	49.6%	50.2%	45.6%	48.3%	48.5%	48.6%	46.5%	45.9%	46.1%	48.0%	48.0%	48.0%	48.0%	45.9%	46.1%	48.0%	48.0%	Common Equity Ratio	51.0%
51.0%	49.0%	48.5%	53.1%	50.6%	50.4%	50.4%	52.5%	54.1%	53.9%	52.0%	52.0%	52.0%	52.0%	54.1%	53.9%	52.0%	52.0%	Total Capital (\$mill)	28200
13828	14921	16515	16687	19160	20330	21952	21794	21933	22735	24425	25125	24425	25125	21933	22735	24425	25125	Net Plant (\$mill)	36300
16106	17112	18445	19914	20874	22464	23863	25093	26939	28436	30175	32000	30175	32000	26939	28436	30175	32000	Return on Total Cap'l	5.5%
5.6%	6.3%	6.0%	7.0%	6.2%	5.7%	5.9%	6.2%	6.5%	6.4%	6.0%	6.0%	6.0%	6.0%	6.5%	6.4%	6.0%	6.0%	Return on Shr. Equity	9.0%
7.7%	9.6%	9.1%	10.3%	9.4%	8.3%	8.8%	9.1%	9.6%	9.4%	9.0%	9.0%	9.0%	9.0%	9.6%	9.4%	9.0%	9.0%	Return on Com Equity ^E	9.0%
7.8%	9.7%	9.2%	10.4%	9.5%	8.4%	8.9%	9.2%	9.6%	9.4%	9.0%	9.0%	9.0%	9.0%	9.6%	9.4%	9.0%	9.0%	Retained to Com Eq	3.0%
.8%	2.6%	2.6%	3.9%	3.1%	2.5%	3.2%	3.1%	3.6%	3.6%	3.0%	3.0%	3.0%	3.0%	3.6%	3.6%	3.0%	3.0%	All Div'ds to Net Prof	64%
89%	74%	73%	63%	67%	71%	65%	66%	62%	62%	64%	64%	64%	64%	62%	62%	64%	64%		

CAPITAL STRUCTURE as of 6/30/14
Total Debt \$12660 mill. Due in 5 Yrs \$4530 mill.
LT Debt \$11084 mill. LT Interest \$543 mill.
(LT interest earned: 4.2x)

Leases, Uncapitalized Annual rentals \$17 mill.

Pension Assets-12/13 \$10755 mill.
Oblig. \$12197 mill.

Pfd Stock None

Common Stock 292,885,004 shs.
as of 7/31/14

MARKET CAP: \$19 billion (Large Cap)

ELECTRIC OPERATING STATISTICS			
	2011	2012	2013
% Change Retail Sales (KWH)	-1.4	-1.1	+1
Avg. Indust. Use (MWH)	N A	N A	N A
Avg. Indust. Revs. per KWH (¢)	N A	N A	N A
Capacity at Peak (Mw)	N M F	N M F	N M F
Peak Load, Summer (Mw)	14788	14344	14883
Annual Load Factor (%)	N M F	N M F	N M F
% Change Customers (yr-end)	N A	N A	N A

BUSINESS: Consolidated Edison, Inc. is a holding company for consolidated Edison Company of New York, Inc. (CECONY), which 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 customers. Pursues competitive energy opportunities through three wholly owned subsidiaries. Purchases most of its power. Fuel costs: 33% of revenues. '13 reported depreciation rates: 2.8%-3.2%. 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.

We have raised our 2014 earnings estimate for Consolidated Edison by \$0.05 a share. Third-quarter profits were greater than we expected. There have been some positive and some negative factors affecting the bottom line. Rate relief is a plus. The utility is also benefiting from conversions of heating customers from oil to natural gas. The nonregulated operations are faring well. Pension expense is down. On the other hand, other operating and maintenance costs are rising, including healthcare costs. Our revised estimate is at the upper end of the company's earnings guidance of \$3.80-\$3.90 a share, which is close to what the company earned in 2013. The stock is ranked 3 (Average) for Timeliness.

We are sticking with our 2015 profit forecast of \$3.95 a share. Oil-to-gas conversions should continue to benefit the company. ConEd has not yet given earnings guidance for 2015.

We expect a dividend increase at the board meeting in early 2015. ConEd has a 40-year track record of hikes in the disbursement. We estimate that the directors will raise the quarterly payout by \$0.015 a share (2.4%), the same increase as in 2014.

Finances are sound. The common equity ratio and fixed-charge coverage are very healthy. The company's size is another plus. ConEd merits a Financial Strength rating of A+.

There is a concern that investors need to keep in mind. In March of 2014, an explosion in Manhattan killed eight people and injured dozens more. Various investigations are pending. About 20 lawsuits have been filed against ConEd. The company believes that its insurance is adequate. It has not taken a reserve for a potential liability from the incident.

ConEd stock has a dividend yield that is about half a percentage point above the utility average. Conservative income-oriented investors might also like the equity's top rank for Safety. However, with the recent price near the upper end of our 2017-2019 Target Price Range, total return potential is unexciting. So far, the uncertainty about the explosion does not appear to have hurt the stock, which is up 15% year to date.

Paul E. Debbas, CFA November 21, 2014

Cal-endar	QUARTERLY REVENUES (\$ mill.)	Full Year
	Mar.31 Jun.30 Sep.30 Dec.31	
2011	3349 2993 3629 2967	12938
2012	3078 2771 3438 2901	12188
2013	3306 2767 3440 2868	12381
2014	3789 2911 3390 2910	13000
2015	3650 2950 3500 3000	13100

Cal-endar	EARNINGS PER SHARE ^A	Full Year
	Mar.31 Jun.30 Sep.30 Dec.31	
2011	1.06 .56 1.30 .65	3.57
2012	.94 .73 1.49 .70	3.86
2013	1.16 .49 1.49 .79	3.93
2014	1.23 .64 1.49 .54	3.90
2015	1.20 .65 1.50 .60	3.95

Cal-endar	QUARTERLY DIVIDENDS PAID ^B	Full Year
	Mar.31 Jun.30 Sep.30 Dec.31	
2010	.595 .595 .595 .595	2.38
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	2.46

(A) Diluted EPS. Excl. nonrec. gain (losses): '02, (11¢); '03, (45¢); '13, (32¢); '14, 9¢; gain on discontinued operations: '08, \$1.01. Next earnings report due early Feb. (B) Div'ds historically paid in mid-Mar., June, Sept., and Dec. (C) Div'd reinvestment plan available. (D) Incl. intangibles. In '13: \$26.83/sh. (E) In millions. (F) Rate base: net orig. cost. Rate allowed on com. eq. for CECONY in '14: 9.2% elec., 9.3% gas and steam; O&R in '12 (elec.) 9.4%, in '09 (gas) 10.3%; earned on avg. com. eq., '13: 9.5%. Regulatory Climate: Below Average.

Company's Financial Strength **A+**
Stock's Price Stability **100**
Price Growth Persistence **50**
Earnings Predictability **85**

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DOMINION RES. NYSE-D				RECENT PRICE	P/E RATIO	Trailing: 22.3 Median: 17.0	RELATIVE P/E RATIO	DIV'D YLD	3.4%	VALUE LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
TIMELINESS 3	Raised 11/15/13	High: 33.0	34.4	43.5	42.2	49.4	48.5	39.8	45.1	53.6	55.6	68.0	74.6	Target Price	Range																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
SAFETY 2	Raised 9/11/08	Low: 25.9	30.4	33.3	34.4	39.8	31.3	27.1	36.1	42.1	48.9	51.9	63.1	2017	2018	2019																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																										
TECHNICAL 4	Lowered 11/21/14	LEGENDS 0.82 x Dividends p sh divided by Interest Rate Relative Price Strength 2-for-1 split 11/07 Options: Yes Shaded area indicates recession										120																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
BETA .70	(1.00 = Market)											100																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
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INDEX</th> </tr> <tr> <td>Revenues per sh</td> <td>15.65</td> <td>14.81</td> <td>18.84</td> <td>19.94</td> <td>16.58</td> <td>18.57</td> <td>20.54</td> <td>25.96</td> <td>23.61</td> <td>27.17</td> <td>27.93</td> <td>25.24</td> <td>26.17</td> <td>25.24</td> <td>22.73</td> <td>22.56</td> <td>21.10</td> <td>20.80</td> <td>15.8</td> <td>10.1</td> </tr> <tr> <td>"Cash Flow" per sh</td> <td>2.99</td> <td>3.68</td> <td>3.71</td> <td>3.92</td> <td>4.45</td> <td>3.97</td> <td>4.18</td> <td>3.70</td> <td>4.91</td> <td>5.08</td> <td>5.07</td> <td>4.82</td> <td>5.11</td> <td>5.04</td> <td>5.24</td> <td>5.47</td> <td>6.10</td> <td>6.45</td> <td>55.1</td> <td>67.5</td> </tr> <tr> <td>Earnings per sh</td> <td>.86</td> <td>1.50</td> <td>1.25</td> <td>1.49</td> <td>2.41</td> <td>1.96</td> <td>2.13</td> <td>1.50</td> <td>2.40</td> <td>2.13</td> <td>3.04</td> <td>2.64</td> <td>2.89</td> <td>2.76</td> <td>2.75</td> <td>3.09</td> <td>3.40</td> <td>3.65</td> <td>156.2</td> <td>124.6</td> </tr> <tr> <td>Div'd Decl'd per sh</td> <td>1.29</td> <td>1.29</td> <td>1.29</td> <td>1.29</td> <td>1.29</td> <td>1.29</td> <td>1.30</td> <td>1.34</td> <td>1.38</td> <td>1.46</td> <td>1.58</td> <td>1.75</td> <td>1.83</td> <td>1.97</td> <td>2.11</td> <td>2.25</td> <td>2.40</td> <td>2.50</td> <td></td> <td></td> </tr> <tr> <td>Cap'l Spending per sh</td> <td>1.60</td> <td>2.16</td> <td>2.82</td> <td>2.31</td> <td>2.17</td> <td>5.20</td> <td>3.88</td> <td>4.83</td> <td>5.81</td> <td>6.89</td> <td>6.09</td> <td>6.40</td> <td>5.89</td> <td>6.41</td> <td>7.20</td> <td>7.06</td> <td>9.55</td> <td>7.95</td> <td></td> <td></td> </tr> <tr> <td>Book Value per sh</td> <td>13.67</td> <td>12.75</td> <td>14.22</td> <td>15.81</td> <td>16.57</td> <td>16.20</td> <td>16.79</td> <td>14.96</td> <td>18.50</td> <td>16.31</td> <td>17.28</td> <td>18.66</td> <td>20.66</td> <td>20.49</td> <td>18.34</td> <td>20.02</td> <td>20.45</td> <td>21.75</td> <td></td> <td></td> </tr> <tr> <td>Revenues (\$mill)</td> <td>388.92</td> <td>372.64</td> <td>491.60</td> <td>529.40</td> <td>618.20</td> <td>650.40</td> <td>680.40</td> <td>695.00</td> <td>698.00</td> <td>576.80</td> <td>583.20</td> <td>599.40</td> <td>580.80</td> <td>569.70</td> <td>576.10</td> <td>581.50</td> <td>583.00</td> <td>584.00</td> <td></td> <td></td> </tr> <tr> <td>Net Profit (\$mill)</td> <td>24.6</td> <td>14.5</td> <td>19.4</td> <td>20.9</td> <td>12.0</td> <td>15.2</td> <td>15.1</td> <td>24.9</td> <td>16.0</td> <td>20.6</td> <td>13.8</td> <td>12.7</td> <td>14.3</td> <td>17.3</td> <td>18.9</td> <td>19.2</td> <td>19.2</td> <td>19.2</td> <td></td> <td></td> </tr> <tr> <td>Income Tax Rate</td> <td>1.28</td> <td>.83</td> <td>1.26</td> <td>1.07</td> <td>.66</td> <td>.87</td> <td>.80</td> <td>1.33</td> <td>.86</td> <td>1.09</td> <td>.83</td> <td>.85</td> <td>.91</td> <td>1.09</td> <td>1.20</td> <td>1.08</td> <td>1.08</td> <td>1.08</td> <td></td> <td></td> </tr> <tr> <td>AFUDC % to Net Profit</td> <td>6.1%</td> <td>5.9%</td> <td>5.3%</td> <td>4.1%</td> <td>4.4%</td> <td>4.3%</td> <td>4.0%</td> <td>3.6%</td> <td>3.6%</td> <td>3.3%</td> <td>3.8%</td> <td>5.2%</td> <td>4.4%</td> <td>4.1%</td> <td>3.8%</td> <td>3.8%</td> <td>3.8%</td> <td>3.8%</td> <td></td> <td></td> </tr> <tr> <td>Long-Term Debt Ratio</td> <td colspan="19"> CAPITAL STRUCTURE as of 6/30/14 Total Debt \$24418 mill. Due in 5 Yrs \$10058 mill. LT Debt \$20473 mill. LT Interest \$972 mill. (LT interest earned: 4.1x) </td> </tr> <tr> <td>Common Equity Ratio</td> <td colspan="19"> Leases, Uncapitalized Annual rentals \$63 mill. Pension Assets-12/13 \$6113 mill. </td> </tr> <tr> <td>Return on Total Cap'l</td> <td colspan="19"> Pfd Stock \$134 mill. Pfd Div'd \$8 mill. 1,340,140 shs. \$4.04-\$7.05, \$100 liq. pref., redeemable at \$101.00-\$112.50/sh. Called in 3Q of '14. Common Stock 582,667,882 shs. </td> </tr> <tr> <td>Return on Shr. Equity</td> <td colspan="19"> MARKET CAP: \$43 billion (Large Cap) </td> </tr> <tr> <td>Return on Com Equity</td> <td colspan="19"> ELECTRIC OPERATING STATISTICS </td> </tr> <tr> <td>Retained to Com Eq</td> <td colspan="19"> <table border="1"> <tr> <th></th> <th>2011</th> <th>2012</th> <th>2013</th> <th colspan="16"></th> </tr> <tr> <td>% Change Retail Sales (KWH)</td> <td>-3.4</td> <td>-2.3</td> <td>+2.7</td> <td colspan="16"></td> </tr> <tr> <td>Avg. Indust. Use (MWH)</td> <td>14823</td> <td>15241</td> <td>14444</td> <td colspan="16"></td> </tr> <tr> <td>Avg. Indust. Revs. per KWH (\$)</td> <td>5.95</td> <td>6.13</td> <td>6.00</td> <td colspan="16"></td> </tr> <tr> <td>Capacity at Peak (MW)</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td colspan="16"></td> </tr> <tr> <td>Peak Load, Summer (MW)</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td colspan="16"></td> </tr> <tr> <td>Annual Load Factor (%)</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td colspan="16"></td> </tr> <tr> <td>% Change Customers (yr-end)</td> <td>+5</td> <td>+9</td> <td>+9</td> <td colspan="16"></td> </tr> </table> </td> </tr> <tr> <td>All Div'ds to Net Prof</td> <td colspan="19"> <table border="1"> <tr> <th></th> <th>2011</th> <th>2012</th> <th>2013</th> <th colspan="16"></th> </tr> <tr> <td>Fixed Charge Cov. 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Due in 5 Yrs \$10058 mill. LT Debt \$20473 mill. LT Interest \$972 mill. (LT interest earned: 4.1x)																			Common Equity Ratio	Leases, Uncapitalized Annual rentals \$63 mill. Pension Assets-12/13 \$6113 mill.																			Return on Total Cap'l	Pfd Stock \$134 mill. Pfd Div'd \$8 mill. 1,340,140 shs. \$4.04-\$7.05, \$100 liq. pref., redeemable at \$101.00-\$112.50/sh. Called in 3Q of '14. Common Stock 582,667,882 shs.																			Return on Shr. Equity	MARKET CAP: \$43 billion (Large Cap)																			Return on Com Equity	ELECTRIC OPERATING STATISTICS																			Retained to Com Eq	<table border="1"> <tr> <th></th> <th>2011</th> <th>2012</th> <th>2013</th> <th colspan="16"></th> </tr> <tr> <td>% Change Retail Sales (KWH)</td> <td>-3.4</td> <td>-2.3</td> <td>+2.7</td> <td colspan="16"></td> </tr> <tr> <td>Avg. Indust. Use (MWH)</td> <td>14823</td> <td>15241</td> <td>14444</td> <td colspan="16"></td> </tr> <tr> <td>Avg. Indust. 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Revenues per sh	15.65	14.81	18.84	19.94	16.58	18.57	20.54	25.96	23.61	27.17	27.93	25.24	26.17	25.24	22.73	22.56	21.10	20.80	15.8	10.1																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
"Cash Flow" per sh	2.99	3.68	3.71	3.92	4.45	3.97	4.18	3.70	4.91	5.08	5.07	4.82	5.11	5.04	5.24	5.47	6.10	6.45	55.1	67.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
Earnings per sh	.86	1.50	1.25	1.49	2.41	1.96	2.13	1.50	2.40	2.13	3.04	2.64	2.89	2.76	2.75	3.09	3.40	3.65	156.2	124.6																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																						
Div'd Decl'd per sh	1.29	1.29	1.29	1.29	1.29	1.29	1.30	1.34	1.38	1.46	1.58	1.75	1.83	1.97	2.11	2.25	2.40	2.50																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
Cap'l Spending per sh	1.60	2.16	2.82	2.31	2.17	5.20	3.88	4.83	5.81	6.89	6.09	6.40	5.89	6.41	7.20	7.06	9.55	7.95																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
Book Value per sh	13.67	12.75	14.22	15.81	16.57	16.20	16.79	14.96	18.50	16.31	17.28	18.66	20.66	20.49	18.34	20.02	20.45	21.75																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
Revenues (\$mill)	388.92	372.64	491.60	529.40	618.20	650.40	680.40	695.00	698.00	576.80	583.20	599.40	580.80	569.70	576.10	581.50	583.00	584.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
Net Profit (\$mill)	24.6	14.5	19.4	20.9	12.0	15.2	15.1	24.9	16.0	20.6	13.8	12.7	14.3	17.3	18.9	19.2	19.2	19.2																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
Income Tax Rate	1.28	.83	1.26	1.07	.66	.87	.80	1.33	.86	1.09	.83	.85	.91	1.09	1.20	1.08	1.08	1.08																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
AFUDC % to Net Profit	6.1%	5.9%	5.3%	4.1%	4.4%	4.3%	4.0%	3.6%	3.6%	3.3%	3.8%	5.2%	4.4%	4.1%	3.8%	3.8%	3.8%	3.8%																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
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BUSINESS: Dominion Resources, Inc. is a holding company for Virginia Power & North Carolina Power, which serve 2.5 mill. customers in Virginia & northeastern North Carolina. Acq'd Consolidated Natural Gas (1.3 mill. customers in Ohio & West Virginia) 1/00. Nonutility operations include independent power production. Owns 68.5% of Dominion Midstream Partners. Elec. rev. breakdown: residential, 46%; commercial, 33%; industrial, 7%; other, 14%. Generating sources: nuclear, 33%; coal, 29%; gas, 16%; other, 1%; purch., 21%. Fuel costs: 41% of revs. '13 reported depr. rates: 2.4%-3.8%. Has 14,500 employees. Chairman, Pres. & CEO: Thomas F. Farrell II, Inc. VA. Address: 120 Tredegar St., P.O. Box 26532, Richmond, VA 23261-6532. Tel.: 804-819-2000. Internet: www.dom.com.											Dominion Resources had an initial public offering for its natural gas master limited partnership in October. Dominion owns 68.5% of the new MLP, Dominion Midstream Partners (NYSE: DM). Dominion Midstream Partners has a preferred equity interest in the Cove Point liquefied natural gas facility, which is being converted from an import to an export terminal. This project is expected to be completed in late 2017 at a cost of \$3.4 billion-\$3.8 billion. The IPO raised nearly \$400 million, which Dominion will use to fund construction of Cove Point. The units have fared very well in their brief history, having soared more than 60% from their IPO price.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Virginia Power is building gas-fired generating plants and expanding its transmission system. A 1,329-megawatt plant should begin commercial operation by yearend at a cost of \$1.1 billion. A 1,358-mw facility is scheduled for completion in mid-2016 at a cost of \$1.3 billion. The utility is earning a return on these investments through riders on customers' bills. Virginia Power also plans to ask the state commission for a certificate of need											to build another gas-fired plant, which would begin operating in 2019. As for transmission, the company expects to place \$900 million of assets in service in 2014, and is targeting spending of \$3.2 billion through 2018. These investments are one reason why we expect higher profits this year and next. All of this capital spending requires financing, most of which has come this year in the form of mandatory convertibles or straight debt.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
Dominion has numerous investment opportunities in midstream gas. The most notable is a 45% stake in a proposed \$4.5 billion-\$5.0 billion pipeline to transport gas from West Virginia to Virginia and North Carolina. A \$500 million project in West Virginia would increase access to gas that would supply this pipeline. These projects are expected to be in service in November of 2018.											The dividend yield of Dominion Resources stock is about equal to the utility mean. With the recent price near the upper end of our 2017-2019 Target Price Range, total return potential is minimal.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																															
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(A) Diluted earnings. Excl. nonrec. gains (losses): '01, (4¢); '03, (\$1.46); '04, (2¢); '06, (16¢); '07, \$1.67; '08, 12¢; '09, (4¢); '10, \$2.18; '11, (7¢); '12, (\$1.70); '14, (7¢); losses from disc. ops.: '06, 26¢; '07, 1¢; '10, 26¢; '12, 4¢; '13, 16¢. Next egs. report due late Jan. (C) Incl. intang. in '13: \$8.38/sh. (D) In mill., adj. for split. (E) Rate base: Net orig. cost, adj. Rate all'd on com. eq. in '11: 10.9%; earned on avg. com. eq.: '13: 16.0%. Regul. Climate: Avg.

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DUKE ENERGY NYSE-DUK		RECENT PRICE	P/E RATIO 19.6 (Trailing: 20.0 Median: NMF)					RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE																																																																																																																																																																																																																																																																																																																																															
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CAPITAL STRUCTURE as of 9/30/14 Total Debt \$41645 mill. Due in 5 Yrs \$14077 mill. LT Debt \$38702 mill. LT Interest \$1684 mill. Incl. \$1516 mill. capitalized leases. Incl. \$1265 mill. nonrecourse LT debt of variable interest entities. (LT interest earned: 3.6x) Leases, Uncapitalized Annual rentals \$175 mill. Pension Assets-12/13 \$8142 mill. Oblig. \$7361 mill. Pfd Stock None Common Stock 707,290,608 shs. as of 11/14/14 MARKET CAP: \$58 billion (Large Cap)										Percent 15 shares 10 traded 5 % TOT. RETURN 10/14 THIS STOCK VL ARITH. INDEX 1 yr. 19.7 10.1 3 yr. 53.7 67.5 5 yr. 122.0 124.6																																																																																																																																																																																																																																																																																																																																															
ELECTRIC OPERATING STATISTICS 2011 2012 2013 % Change Retail Sales (KWH) -2.1 -2.8 +1.3 Avg. Indust. Use (MWH) 3062 2675 2687 Avg. Indust. Pkgs. per KWH (\$) 4.89 5.84 5.89 Capacity at Peak (Mw) N/A N/A N/A Peak Load, Summer (Mw) N/A N/A N/A Annual Load Factor (%) N/A N/A N/A % Change Customers (avg.) +3 +8 +8 Fixed Charge Cov. (%) 292 263 327		<table border="1"> <thead> <tr> <th>Year</th> <th>2004</th> <th>2005</th> <th>2006</th> <th>2007</th> <th>2008</th> <th>2009</th> <th>2010</th> <th>2011</th> <th>2012</th> <th>2013</th> <th>2014</th> <th>2015</th> <th>17-19</th> </tr> </thead> <tbody> <tr> <td>Revenues per sh</td> <td>--</td> <td>--</td> <td>25.32</td> <td>30.24</td> <td>31.15</td> <td>29.18</td> <td>32.22</td> <td>32.63</td> <td>27.88</td> <td>34.84</td> <td>34.10</td> <td>34.90</td> <td>39.00</td> </tr> <tr> <td>"Cash Flow" per sh</td> <td>--</td> <td>--</td> <td>7.86</td> <td>8.11</td> <td>7.34</td> <td>7.58</td> <td>8.49</td> <td>8.68</td> <td>6.80</td> <td>8.56</td> <td>8.85</td> <td>9.40</td> <td>10.50</td> </tr> <tr> <td>Earnings per sh ^A</td> <td>--</td> <td>--</td> <td>2.76</td> <td>3.60</td> <td>3.03</td> <td>3.39</td> <td>4.02</td> <td>4.14</td> <td>3.71</td> <td>3.98</td> <td>4.20</td> <td>4.65</td> <td>5.25</td> </tr> <tr> <td>Div'd Decl'd per sh ^B</td> <td>--</td> <td>--</td> <td>--</td> <td>2.58</td> <td>2.70</td> <td>2.82</td> <td>2.91</td> <td>2.97</td> <td>3.03</td> <td>3.09</td> <td>3.15</td> <td>3.21</td> <td>3.45</td> </tr> <tr> <td>Cap'l Spending per sh</td> <td>--</td> <td>--</td> <td>8.07</td> <td>7.43</td> <td>10.35</td> <td>9.85</td> <td>10.84</td> <td>9.80</td> <td>7.81</td> <td>7.83</td> <td>8.45</td> <td>10.50</td> <td>11.25</td> </tr> <tr> <td>Book Value per sh ^C</td> <td>--</td> <td>--</td> <td>62.30</td> <td>50.40</td> <td>49.51</td> <td>49.85</td> <td>50.84</td> <td>51.14</td> <td>58.04</td> <td>58.54</td> <td>58.30</td> <td>59.70</td> <td>64.50</td> </tr> <tr> <td>Common Shs Outst'g ^D</td> <td>--</td> <td>--</td> <td>418.96</td> <td>420.62</td> <td>423.96</td> <td>436.29</td> <td>442.96</td> <td>445.29</td> <td>704.00</td> <td>706.00</td> <td>707.00</td> <td>708.00</td> <td>711.00</td> </tr> <tr> <td>Avg Ann'l P/E Ratio</td> <td>--</td> <td>--</td> <td>--</td> <td>16.1</td> <td>17.3</td> <td>13.3</td> <td>12.7</td> <td>13.8</td> <td>17.5</td> <td>17.4</td> <td colspan="2">Bold figures are Value Line estimates</td> <td>14.0</td> </tr> <tr> <td>Relative P/E Ratio</td> <td>--</td> <td>--</td> <td>--</td> <td>.85</td> <td>1.04</td> <td>.89</td> <td>.81</td> <td>.87</td> <td>1.11</td> <td>.98</td> <td colspan="2"></td> <td>.90</td> </tr> <tr> <td>Avg Ann'l Div'd Yield</td> <td>--</td> <td>--</td> <td>--</td> <td>4.4%</td> <td>5.2%</td> <td>6.2%</td> <td>5.7%</td> <td>5.2%</td> <td>4.7%</td> <td>4.4%</td> <td colspan="2"></td> <td>4.7%</td> </tr> <tr> <td>Revenues (\$mill)</td> <td>--</td> <td>--</td> <td>10607</td> <td>12720</td> <td>13207</td> <td>12731</td> <td>14272</td> <td>14529</td> <td>19624</td> <td>24598</td> <td>24100</td> <td>24700</td> <td>27800</td> </tr> <tr> <td>Net Profit (\$mill)</td> <td>--</td> <td>--</td> <td>1080.0</td> <td>1522.0</td> <td>1279.0</td> <td>1461.0</td> <td>1765.0</td> <td>1839.0</td> <td>2136.0</td> <td>2813.0</td> <td>2970</td> <td>3315</td> <td>3730</td> </tr> <tr> <td>Income Tax Rate</td> <td>--</td> <td>--</td> <td>29.4%</td> <td>31.9%</td> <td>32.5%</td> <td>34.4%</td> <td>32.6%</td> <td>31.3%</td> <td>30.2%</td> <td>32.6%</td> <td>32.5%</td> <td>34.5%</td> <td>34.5%</td> </tr> <tr> <td>AFUDC % to Net Profit</td> <td>--</td> <td>--</td> <td>6.9%</td> <td>7.2%</td> <td>16.0%</td> <td>17.5%</td> <td>22.7%</td> <td>23.2%</td> <td>22.3%</td> <td>8.8%</td> <td>7.0%</td> <td>8.0%</td> <td>8.0%</td> </tr> <tr> <td>Long-Term Debt Ratio</td> <td>--</td> <td>--</td> <td>41.0%</td> <td>30.9%</td> <td>38.7%</td> <td>42.8%</td> <td>44.3%</td> <td>45.1%</td> <td>47.0%</td> <td>48.0%</td> <td>49.5%</td> <td>50.5%</td> <td>52.5%</td> </tr> <tr> <td>Common Equity Ratio</td> <td>--</td> <td>--</td> <td>59.0%</td> <td>69.1%</td> <td>61.3%</td> <td>57.4%</td> <td>55.7%</td> <td>54.9%</td> <td>52.9%</td> <td>52.0%</td> <td>50.5%</td> <td>49.5%</td> <td>47.5%</td> </tr> <tr> <td>Total Capital (\$mill)</td> <td>--</td> <td>--</td> <td>44220</td> <td>30697</td> <td>34238</td> <td>37863</td> <td>40457</td> <td>41451</td> <td>77307</td> <td>79482</td> <td>81525</td> <td>85025</td> <td>96300</td> </tr> <tr> <td>Net Plant (\$mill)</td> <td>--</td> <td>--</td> <td>41447</td> <td>31110</td> <td>34036</td> <td>37950</td> <td>40344</td> <td>42661</td> <td>68558</td> <td>69490</td> <td>70775</td> <td>74875</td> <td>88400</td> </tr> <tr> <td>Return on Total Cap'l</td> <td>--</td> <td>--</td> <td>3.1%</td> <td>6.0%</td> <td>4.8%</td> <td>4.9%</td> <td>5.6%</td> <td>5.6%</td> <td>3.6%</td> <td>4.6%</td> <td>4.5%</td> <td>5.0%</td> <td>5.0%</td> </tr> <tr> <td>Return on Shr. Equity</td> <td>--</td> <td>--</td> <td>4.1%</td> <td>7.2%</td> <td>6.1%</td> <td>6.7%</td> <td>7.8%</td> <td>8.1%</td> <td>5.2%</td> <td>6.8%</td> <td>7.0%</td> <td>8.0%</td> <td>8.0%</td> </tr> <tr> <td>Return on Com Equity ^E</td> <td>--</td> <td>--</td> <td>4.1%</td> <td>7.2%</td> <td>6.1%</td> <td>6.7%</td> <td>7.8%</td> <td>8.1%</td> <td>5.2%</td> <td>6.8%</td> <td>7.0%</td> <td>8.0%</td> <td>8.0%</td> </tr> <tr> <td>Retained to Com Eq</td> <td>--</td> <td>--</td> <td>4.1%</td> <td>2.0%</td> <td>.6%</td> <td>1.1%</td> <td>2.1%</td> <td>2.2%</td> <td>.9%</td> <td>1.5%</td> <td>2.0%</td> <td>2.5%</td> <td>3.0%</td> </tr> <tr> <td>All Div'ds to Net Prof</td> <td>--</td> <td>--</td> <td>--</td> <td>72%</td> <td>89%</td> <td>84%</td> <td>73%</td> <td>72%</td> <td>82%</td> <td>78%</td> <td>75%</td> <td>68%</td> <td>66%</td> </tr> </tbody> </table>								Year	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	17-19	Revenues per sh	--	--	25.32	30.24	31.15	29.18	32.22	32.63	27.88	34.84	34.10	34.90	39.00	"Cash Flow" per sh	--	--	7.86	8.11	7.34	7.58	8.49	8.68	6.80	8.56	8.85	9.40	10.50	Earnings per sh ^A	--	--	2.76	3.60	3.03	3.39	4.02	4.14	3.71	3.98	4.20	4.65	5.25	Div'd Decl'd per sh ^B	--	--	--	2.58	2.70	2.82	2.91	2.97	3.03	3.09	3.15	3.21	3.45	Cap'l Spending per sh	--	--	8.07	7.43	10.35	9.85	10.84	9.80	7.81	7.83	8.45	10.50	11.25	Book Value per sh ^C	--	--	62.30	50.40	49.51	49.85	50.84	51.14	58.04	58.54	58.30	59.70	64.50	Common Shs Outst'g ^D	--	--	418.96	420.62	423.96	436.29	442.96	445.29	704.00	706.00	707.00	708.00	711.00	Avg Ann'l P/E Ratio	--	--	--	16.1	17.3	13.3	12.7	13.8	17.5	17.4	Bold figures are Value Line estimates		14.0	Relative P/E Ratio	--	--	--	.85	1.04	.89	.81	.87	1.11	.98			.90	Avg Ann'l Div'd Yield	--	--	--	4.4%	5.2%	6.2%	5.7%	5.2%	4.7%	4.4%			4.7%	Revenues (\$mill)	--	--	10607	12720	13207	12731	14272	14529	19624	24598	24100	24700	27800	Net Profit (\$mill)	--	--	1080.0	1522.0	1279.0	1461.0	1765.0	1839.0	2136.0	2813.0	2970	3315	3730	Income Tax Rate	--	--	29.4%	31.9%	32.5%	34.4%	32.6%	31.3%	30.2%	32.6%	32.5%	34.5%	34.5%	AFUDC % to Net Profit	--	--	6.9%	7.2%	16.0%	17.5%	22.7%	23.2%	22.3%	8.8%	7.0%	8.0%	8.0%	Long-Term Debt Ratio	--	--	41.0%	30.9%	38.7%	42.8%	44.3%	45.1%	47.0%	48.0%	49.5%	50.5%	52.5%	Common Equity Ratio	--	--	59.0%	69.1%	61.3%	57.4%	55.7%	54.9%	52.9%	52.0%	50.5%	49.5%	47.5%	Total Capital (\$mill)	--	--	44220	30697	34238	37863	40457	41451	77307	79482	81525	85025	96300	Net Plant (\$mill)	--	--	41447	31110	34036	37950	40344	42661	68558	69490	70775	74875	88400	Return on Total Cap'l	--	--	3.1%	6.0%	4.8%	4.9%	5.6%	5.6%	3.6%	4.6%	4.5%	5.0%	5.0%	Return on Shr. Equity	--	--	4.1%	7.2%	6.1%	6.7%	7.8%	8.1%	5.2%	6.8%	7.0%	8.0%	8.0%	Return on Com Equity ^E	--	--	4.1%	7.2%	6.1%	6.7%	7.8%	8.1%	5.2%	6.8%	7.0%	8.0%	8.0%	Retained to Com Eq	--	--	4.1%	2.0%	.6%	1.1%	2.1%	2.2%	.9%	1.5%	2.0%	2.5%	3.0%	All Div'ds to Net Prof	--	--	--	72%	89%	84%	73%	72%	82%	78%	75%	68%	66%
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Earnings per sh ^A	--	--	2.76	3.60	3.03	3.39	4.02	4.14	3.71	3.98	4.20	4.65	5.25																																																																																																																																																																																																																																																																																																																																												
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BUSINESS: Duke Energy Corporation is a holding company for utilities with 7.1 mill. elec. customers in North Carolina, Florida, Indiana, South Carolina, Ohio, and Kentucky, and over 500,000 gas customers in Ohio & Kentucky. Owns independent power plants & has international ops. Acq'd Cinergy 4/06; spun off midstream gas ops. 1/07; acq'd Progress Energy 7/12. Elec. rev. breakdown: residential, 43%; commercial, 31%; industrial, 15%; other, 11%. Generating sources: coal, 36%; nuclear, 29%; gas, 21%; other, 1%; purchased, 13%. Fuel costs: 37% of revs. '13 reported deprec. rates: 2.4%-3.3%. Has 27,900 emp. Chairman: Ann Gray. Pres. & CEO: Lynn J. Good. Inc.: DE. Address: 550 South Tryon St., Charlotte, NC 28202-1803. Tel.: 704-382-3853. Web: www.duke-energy.com.																																																																																																																																																																																																																																																																																																																																																									
Duke Energy has reached an agreement to sell its nonregulated generating assets in the Midwest. The company will receive \$2.8 billion in cash for its ownership interests in 11 plants and its retail energy marketing business in Ohio. Duke took a \$1.23-a-share writedown in the first quarter to reflect an expected loss on the sale, but reversed \$0.43 in the third period. (This operation is now treated as discontinued.) The sale is likely to close by the end of the first quarter of 2015. Duke expects the move to be accretive to earnings by 2016. It will use the proceeds for capital spending, to replace debt financing, or to buy back stock.																																																																																																																																																																																																																																																																																																																																																									
Duke's regulated utilities plan to buy some power plants. The company has agreed to pay \$1.2 billion for another utility's minority stake (about 700 megawatts) in nuclear and coal-fired units in North Carolina that Duke operates. This requires regulatory approval.																																																																																																																																																																																																																																																																																																																																																									
The company has other investment opportunities. In South Carolina, Duke is adding 650 mw of gas-fired capacity at a cost of \$600 million. In Florida, the utility plans to build a 1,685-mw gas-fired plant at a cost of \$1.5 billion. In Indiana, Duke is proposing a seven-year, \$1.9 billion plan to modernize its electric grid. Finally, the company has a 40% stake in a proposed \$4.5 billion-\$5.0 billion pipeline to transport gas from West Virginia to North Carolina.																																																																																																																																																																																																																																																																																																																																																									
The aforementioned projects should help produce earnings growth. Note that our earnings presentation includes integration costs, which Duke is still incurring, associated with the takeover of Progress Energy in 2012. These expenses reduced earnings by \$0.15 a share in the first nine months of 2014.																																																																																																																																																																																																																																																																																																																																																									
Duke continues to review its international operations. It expects to complete this in late 2014 or early 2015.																																																																																																																																																																																																																																																																																																																																																									
Duke stock is mainly of interest for its dividend yield. The yield is slightly above the utility average. With the recent price near the upper end of our 2017-2019 Target Price Range, total return potential is low. Note that Duke is facing litigation, regulation, and costs associated with the accidental release of coal ash into a river in North Carolina in February of 2014.																																																																																																																																																																																																																																																																																																																																																									
Paul E. Debbas, CFA November 21, 2014																																																																																																																																																																																																																																																																																																																																																									

(A) Dil. EPS. Excl. nonrec. losses: '12, 70¢; '13, 24¢; gains (loss) on disc. ops.: '12, 6¢; '13, 2¢; '14, (81¢). '12 EPS don't add due to chg. in shs., '13 due to rounding. Next egs. report due mid-Feb. (B) Div'ds paid mid-Mar., June, Sept., & Dec. ■ Div'd reinv. avail. (C) Incl. intang. in '13: \$36.42/sh. (D) In mill., adj. for rev. split. (E) Rate base: Net orig. cost. Rates all'd on com. eq. in '13 in NC/SC: 10.2%; in '09 in OH: 10.63% (elec.); in '04 in IN: 10.3%; earned avg. com. eq., '13: 6.8%. Reg. Clim.: NC Avg., SC, OH, IN Above Avg. (F) Restated 6-month total.

Company's Financial Strength	A
Stock's Price Stability	100
Price Growth Persistence	50
Earnings Predictability	75

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EDISON INTERNAT'L NYSE-EX				RECENT PRICE	P/E RATIO 17.8 (Trailing: 17.0 Median: 12.0)								RELATIVE P/E RATIO	DIV'D YLD	2.5%	VALUE LINE				
TIMELINESS 3 Lowered 11/7/14	High: 22.1	32.5	49.2	47.2	60.3	55.7	36.7	39.4	41.6	48.0	54.2	68.7				Target Price Range				
SAFETY 2 Raised 5/3/13	Low: 10.6	21.2	30.4	37.9	42.8	26.7	23.1	30.4	32.6	39.6	44.3	44.7				2017 2018 2019				
TECHNICAL 3 Raised 1/2/15	LEGENDS 1.20 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession																			
BETA .75 (1.00 = Market)																				
2017-19 PROJECTIONS																				
Price	Gain	Ann'l Total Return																		
High 75 (+10%)	5%																			
Low 55 (-20%)	-2%																			
Insider Decisions																				
F M A M J J A S O																				
to Buy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
Options	1	6	0	3	0	0	1	0	0	0	0	0	0	0	0	0				
to Sell	0	5	0	3	0	0	1	0	0	0	0	0	0	0	0	0				
Institutional Decisions																				
10/2014	20/2014	30/2014																		
to Buy	219	200	206																	
to Sell	231	221	217																	
Hld's(000)	260616	258418	260974																	
Percent shares traded	15	10	5																	
1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015																				
29.12	27.85	35.96	35.10	35.26	37.25	31.30	36.38	38.74	40.25	43.31	37.98	38.09	39.16	36.41	38.61	40.80	42.95	Revenues per sh	51.50	
6.65	7.20	d.52	4.35	4.79	5.88	3.79	6.99	7.25	7.60	8.08	7.96	8.41	9.03	9.63	8.80	9.10	9.20	"Cash Flow" per sh	11.25	
1.86	2.03	d5.84	1.30	1.82	2.38	.69	3.34	3.28	3.32	3.68	3.24	3.35	3.23	4.55	3.78	4.00	3.75	Earnings per sh A	4.50	
1.04	1.08	.83	--	--	--	.80	1.02	1.10	1.18	1.23	1.25	1.27	1.29	1.31	1.37	1.48	1.71	Div'd Decl'd per sh B	2.25	
2.75	3.55	4.57	2.86	4.88	3.95	5.32	5.73	7.78	8.67	8.67	10.07	13.94	14.76	12.73	11.05	12.70	13.70	Cap'l Spending per sh	13.00	
14.55	15.01	7.43	10.04	13.62	16.52	18.57	20.30	23.66	25.92	29.21	30.20	32.44	30.86	28.95	30.50	33.35	35.30	Book Value per sh C	41.50	
350.55	347.21	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	325.81	Common Shs Outst'g D	325.81
15.1	12.9	--	10.0	7.8	7.0	NMF	11.7	13.0	16.0	12.4	9.7	10.3	11.8	9.7	12.7	14.1		Avg Ann'l P/E Ratio	14.5	
.79	.74	--	.51	.43	.40	NMF	.62	.70	.85	.75	.65	.66	.74	.62	.71	.75		Relative P/E Ratio	.90	
3.7%	4.1%	3.9%	--	--	--	3.1%	2.6%	2.6%	2.2%	2.7%	4.0%	3.7%	3.4%	3.0%	2.8%	2.6%		Avg Ann'l Div'd Yield	3.5%	
CAPITAL STRUCTURE as of 9/30/14																				
Total Debt \$12186 mill. Due in 5 Yrs \$2809 mill.																				
LT Debt \$10133 mill. LT Interest \$486 mill.																				
(LT interest earned: 4.8x)																				
Leases, Uncapitalized Annual rentals \$1349 mill.																				
Pens. Assets-12/13 \$3477 mill. Oblig. \$4178 mill.																				
Pfd Stock \$2022 mill. Pfd Div'd \$115 mill.																				
4,800,198 sh. 4.08%-4.78%, \$25 par, call. \$25.50-\$28.75/sh.; 3,250,000 sh. 5.07%, noncum., call.																				
\$100; 1,250,000 sh. 6.5%, cum., \$100 liq. value;																				
350,000 sh. 6.25%, \$1000 liq. value; 460,012 sh.																				
5.1%-5.75%, \$2500 liq. value.																				
Common Stock 325,811,206 shs. as of 10/24/14																				
MARKET CAP: \$22 billion (Large Cap)																				
ELECTRIC OPERATING STATISTICS																				
2011 2012 2013																				
% Change Retail Sales (KWH) +9 +2.6 -3																				
Avg. Indust. Use (MWH) 7.36 7.63 7.91																				
Avg. Indust. Revs. per KWH (\$) 7.09 7.50 8.00																				
Capacity at Peak (Mw) N/A N/A N/A																				
Peak Load, Summer (Mw) 22374 21981 22534																				
Annual Load Factor (%) 50.7 52.7 52.1																				
% Change Customers (yr-end) +4 +4 +6																				
Fixed Charge Cov. (%) 209 308 295																				
ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Est'd '11-'13 of change (per sh)																				
Revenues -5% -1.5% 5.0%																				
"Cash Flow" 6.0% 3.5% 3.5%																				
Earnings 7.5% 2.5% 2.5%																				
Dividends -- 2.5% 9.5%																				
Book Value 8.5% 3.0% 5.5%																				
QUARTERLY REVENUES (\$ mill.)																				
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year															
2011	2782	2983	3981	3014	12760															
2012	2415	2653	3734	3060	11862															
2013	2632	3046	3960	2943	12581															
2014	2926	3016	4356	3002	13300															
2015	3100	3400	4300	3200	14000															
EARNINGS PER SHARE A																				
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year															
2011	.62	.54	1.31	.76	3.23															
2012	.54	.55	1.09	2.39	4.55															
2013	.78	.78	1.41	.81	3.78															
2014	.61	1.07	1.52	.80	4.00															
2015	.75	.75	1.50	.75	3.75															
QUARTERLY DIVIDENDS PAID B																				
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full 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																			
BUSINESS: Edison International (formerly SCECorp) is a holding 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, 40%; commercial, 42%; industrial, 5%; other, 13%. Generating sources: gas, 7%; nuclear, 6%; coal, 5%; hydro, 3%; purchased, 79%. Fuel costs: 35% of revs. '13 reported deprec. rate: 4.2%. 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.																				
Edison International's board of directors rewarded the company's stockholders with a large dividend increase. The board raised the annual dividend by \$0.25 a share (17.6%), payable at the end of January. The company is targeting a payout ratio of 45%-55% of the profits of its utility subsidiary, Southern California Edison.																				
SCE's general rate case is pending. The utility is asking for rate hikes of \$82 million in 2015, \$295 million in 2016, and \$313 million in 2017. On the other hand, the state's Office of Ratepayer Advocates and an intervenor group are proposing a decrease of \$680 million this year, followed by increases of \$98 million in 2016 and \$116 million in 2017. The ruling will be retroactive to the start of 2015. No matter what happens with the rate order...																				
Earnings will probably decline in 2015. Edison International recorded some tax benefits in 2014, thereby making the profit comparison difficult. The tax rate will probably be higher this year. We expect earnings growth to resume in 2016. The utility is benefiting from its rising rate base, which is expected to climb 7%-9% annually through 2017.																				
The California commission approved a regulatory settlement concerning the San Onofre nuclear plant. SCE shut the two units in 2013 due to damage stemming from the replacement of the steam generators, and took a writedown. The utility will retain 5% of any insurance recoveries and 50% of any monies it gets from the manufacturer of the steam generators. SCE is involved in a dispute, which won't likely be resolved anytime soon, with the manufacturer.																				
Edison International was one of the top-performing electric utility stocks in 2014. The share price rose nearly 50%, as investors responded favorably to the resolution of the uncertainties surrounding San Onofre. The dividend hike helped, too. However, even though we have raised our sights for the 3- to 5-year period, with the recent price above the midpoint of our 2017-2019 Target Price Range, total return potential (like that of most utility issues) is low. The stock's dividend yield is also about a percentage point below the industry average.																				
Paul E. Debbas, CFA January 30, 2015																				
Company's Financial Strength A																				
Stock's Price Stability 100																				
Price Growth Persistence 45																				
Earnings Predictability 65																				

(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 disc. ops.: '12, (\$5.11); '13, '14, 44¢. '12 EPS don't add due to rounding. Next earnings report due Feb. (B) Div'ds paid late Jan., Apr., July, & Oct. Div'd reinvestment plan avail. (C) Incl. deferred charges. In '13: \$22.22/sh. (D) In mill. (E) Rate base: net org. cost. Rate allowed on com. eq. in '13: 10.45%; earned on avg. com. eq., '13: 12.5%. Regulatory Climate: Above Average.

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EL PASO ELECTRIC NYSE:EE				RECENT PRICE	40.28	P/E RATIO	18.0	(Trailing: 18.4)	RELATIVE P/E RATIO	0.98	DIV'D YLD	2.9%	VALUE LINE					
TIMELINESS	3	Lowered 12/5/14	High: 13.6	19.1	22.4	25.0	28.2	25.5	21.1	28.7	35.7	35.3	39.1	42.2	Target Price Range	2017	2018	2019
SAFETY	2	Raised 5/11/07	Low: 10.1	13.1	17.8	18.2	20.8	15.2	11.6	18.7	26.7	29.2	31.8	33.4				
TECHNICAL	3	Raised 11/28/14	LEGENDS 5.0 x "Cash Flow" p sh --- Relative Price Strength Options: Yes Shaded area indicates recession															
BETA	.70	(1.00 = Market)	2017-19 PROJECTIONS Price Gain Ann'l Total High 45 (+10%) 6% Low 35 (-15%) Nil															
Insider Decisions			F M A M J J A S O to Buy 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 Options 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 to Sell 0 0 0 1 1 0 2 0 0 0 0 0 0 0 0 0 0 0 0															
Institutional Decisions			1Q2014 2Q2014 3Q2014 to Buy 83 72 69 to Sell 75 90 76 Hld's(000) 39582 39656 40115 Percent shares traded 21 14 7															
© VALUE LINE PUB. LLC 17-19			1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 Revenues per sh 26.75 "Cash Flow" per sh 7.25 Earnings per sh ^A 2.50 Div'd Decl'd per sh ^B 1.35 Cap'l Spending per sh 7.00 Book Value per sh ^C 28.25 Common Shs Outst'g ^D 41.30 Avg Ann'l P/E Ratio 15.5 Relative P/E Ratio .95 Avg Ann'l Div'd Yield 3.5%															
CAPITAL STRUCTURE as of 9/30/14			Total Debt \$1089.2 mill. Due in 5 Yrs \$187.7 mill. LT Debt \$984.7 mill. LT Interest \$60.6 mill. (LT interest earned: 2.7x) Leases, Uncapitalized Annual rentals \$1.1 mill. Pension Assets-12/13 \$257.8 mill. Oblig. \$317.8 mill. Pfd Stock None Common Stock 40,357,982 shs. as of 10/31/14 MARKET CAP: \$1.6 billion (Mid Cap)															
ELECTRIC OPERATING STATISTICS			2011 2012 2013 % Change Retail Sales (KWH) +3.1 +7 +4 Avg. Indust. Use (MWH) 21921 21659 21908 Avg. Indust. Revs. per KWH (\$) N/A N/A N/A Capacity at Peak (Mw) 1785 1785 1852 Peak Load, Summer (Mw) 1714 1688 1750 Annual Load Factor (%) N/A N/A N/A % Change Customers (yr-end) +1.7 +1.5 +1.3 Fixed Charge Cov. (%) 346 302 280															
ANNUAL RATES of change (per sh)			Past 10 Yrs. Past 5 Yrs. Est'd '11-'13 to '17-'19 Revenues 4.5% 2.0% 3.0% "Cash Flow" 6.5% 8.5% 4.0% Earnings 11.0% 8.5% 1.5% Dividends -- -- 7.0% Book Value 8.0% 8.0% 5.0%															
QUARTERLY REVENUES (\$ mill.)			Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 176.1 242.6 307.6 191.7 918.0 2012 168.6 228.3 267.2 188.8 852.9 2013 177.3 240.1 282.7 190.3 890.4 2014 185.5 251.8 283.6 204.1 925 2015 195 255 295 205 950															
EARNINGS PER SHARE ^A			Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 .16 .78 1.40 .13 2.48 2012 .08 .77 1.29 .12 2.26 2013 .19 .72 1.26 .03 2.20 2014 .11 .75 1.30 .14 2.30 2015 .15 .65 1.15 .10 2.05															
QUARTERLY DIVIDENDS PAID ^B			Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 -- .22 .22 .22 .66 2012 .22 .25 .25 .25 .97 2013 .25 .265 .265 .265 1.05 2014 .265 .28 .28 .28 1.11 2015															
BUSINESS: El Paso Electric Company (EPE) provides electric service to 398,000 customers in an area of approximately 10,000 square miles in the Rio Grande valley in western Texas (68% of revenues) and southern New Mexico (19% of revenues), including El Paso, Texas and Las Cruces, New Mexico. Wholesale is 13% of revenues. Electric revenue breakdown by customer class not available. Generating sources: nuclear, 46%; gas, 34%; coal, 6%; purchased, 14%. Fuel costs: 32% of revenues. '13 reported depreciation rate: 2.6%. Has about 1,000 employees. Chairman: Michael K. Parks. CEO: Thomas V. Shockley, III. President: Mary Kipp, Inc. Texas. Address: Stanton Tower, 100 North Stanton, El Paso, Texas 79901. Telephone: 915-543-5711. Internet: www.epelectric.com.			The effects of regulatory lag for El Paso Electric in 2015 will be greater than we had expected. The company is building four 88-megawatt gas-fired peaking units. Two are expected to be in service by the end of the current quarter. A third unit will be on line in 2016, and a fourth in late 2016 or early 2017. (The total cost is estimated at \$370 million.) The utility is planning to file rate cases in New Mexico in April and in Texas in August, with new tariffs taking effect in each state in March of 2016. This means that EPE won't get any rate relief this year, but will incur costs associated with the new units. In addition, the Allowance for Funds Used During Construction (a noncash credit to income) that the company will record in 2015 will be well below the 2014 level due to the completion of the first two units. All of this will hurt earnings this year by an estimated \$0.31-\$0.37 a share. There will be some positive factors, too, such as customer growth that has been at 1.4% lately, but the negative will almost certainly outweigh the positive. All told, we have cut our 2015 earnings estimate by \$0.15 a share, to \$2.05.															
We forecast higher profits in 2016. EPE should benefit from rate relief and continued growth in its service area (see below).			The company is financing its construction budget with debt. EPE issued \$150 million of 30-year debt in December, and will probably issue the same amount (although with a shorter maturity) in late 2015.															
The economy of the utility's service area is in good shape. For a few years, growth was driven by the expansion of the army base at Fort Bliss. Now, other factors are helping. Some companies have announced plans for new facilities and will hire workers. Other expansions are occurring at medical facilities and at the University of Texas at El Paso. All of this should help boost the demand for power.			The stock's dividend yield is a cut below the utility average. Although we project strong dividend growth over the 3- to 5-year period, total return prospects are unspectacular, given that the recent price is well within our 2017-2019 Target Price Range.															
(A) Diluted earnings. Excl. nonrecurring gains (losses): '98, 6¢; '99, (38¢); '01, (4¢); '03, 81¢; '04, 4¢; '05, (2¢); '06, 13¢; '10, 24¢. '11 earnings include total due to rounding. Next earnings report due late Feb. (B) Initial dividend declared 4/11; payment dates in late March, June, Sept., and Dec. (C) Incl. deferred charges. In '13: \$101.0 mill., \$2.51/sh. (D) In millions. (E) Rate allowed on common equity in '12: none specified; earned on average common equity. '13: 10.0%. Regulatory Climate: Average.			Company's Financial Strength B++ Stock's Price Stability 95 Price Growth Persistence 80 Earnings Predictability 85															
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EMPIRE DISTRICT NYSE:EDE

RECENT PRICE **28.73** P/E RATIO **20.4** (Trailing: 17.5 Median: 16.0) RELATIVE P/E RATIO **1.10** DIV'D YLD **3.7%** VALUE LINE

TIMELINESS 4 Lowered 12/5/14	High: 22.5 23.5 25.0 25.1 26.1 23.5 19.4 22.5 23.3 22.0 24.3 29.2	Low: 17.0 19.5 19.3 20.3 21.1 14.9 11.9 17.6 18.0 19.5 20.6 22.0	Target Price Range 2017 2018 2019
SAFETY 2 Raised 3/23/12	LEGENDS 0.67 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession		
TECHNICAL 4 Lowered 12/12/14			
BETA .70 (1.00 = Market)			
2017-19 PROJECTIONS			
Price	Gain	Ann'l Total Return	
High 25 (-15%)	Low 20 (-30%)	1%	
Insider Decisions			
J F M A M J J A S			
to Buy 0 0 2 0 0 0 0 0 0			
Options 0 5 0 0 0 0 0 0 0			
to Sell 0 1 0 0 1 1 0 1 1			
Institutional Decisions			
10/2014 2Q2014 3Q2014			
to Buy 91 73 56			
to Sell 42 63 69			
Hld's(000) 21265 20869 20997			
Percent shares traded	12	8	4
% TOT. RETURN 11/14			
1 yr.	27.1	8.0	
3 yr.	50.7	72.4	
5 yr.	92.8	119.8	

1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC	17-19
14.02	13.94	14.78	13.37	13.56	13.03	12.67	14.80	13.67	14.59	15.25	13.04	13.02	13.74	13.11	13.81	15.15	15.45	Revenues per sh	16.75
2.97	2.89	3.12	2.19	2.43	2.48	2.22	2.45	2.75	2.69	2.91	2.72	2.85	3.21	2.99	3.14	3.45	3.60	"Cash Flow" per sh	4.25
1.53	1.13	1.35	.59	1.19	1.29	.86	.92	1.41	1.09	1.17	1.18	1.17	1.31	1.32	1.48	1.55	1.50	Earnings per sh ^A	1.75
1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.28	1.00	1.01	1.03	1.05	Div'd Decl'd per sh ^B [†]	1.15
3.03	4.14	7.61	4.02	3.43	2.65	1.64	2.83	3.97	5.46	6.28	4.07	2.63	2.44	3.22	3.60	5.15	4.05	Cap'l Spending per sh	3.50
13.43	13.48	13.65	13.58	14.59	15.17	14.76	15.08	15.49	16.04	15.56	15.75	15.82	16.53	16.90	17.43	17.95	18.35	Book Value per sh ^C	20.00
17.11	17.37	17.60	19.76	22.57	24.98	25.70	26.08	30.25	33.61	33.98	38.11	41.58	41.98	42.48	43.04	43.50	44.00	Common Shs Outst'g ^D	47.00
14.0	21.7	17.7	33.9	16.2	15.8	24.8	24.5	15.9	21.7	17.3	14.3	16.8	15.8	15.8	15.0	<i>Bold figures are Value Line estimates</i>		Avg Ann'l P/E Ratio	13.0
.73	1.24	1.15	1.74	.88	.90	1.31	1.30	.86	1.15	1.04	.95	1.07	.99	1.01	.85			Relative P/E Ratio	.80
6.0%	5.2%	5.4%	6.4%	6.6%	6.3%	6.0%	5.7%	5.7%	5.4%	6.3%	7.6%	6.5%	3.1%	4.8%	4.5%			Avg Ann'l Div'd Yield	5.0%
CAPITAL STRUCTURE as of 9/30/14																			
Total Debt \$806.6 mill. Due in 5 Yrs \$179.6 mill.																			
LT Debt \$743.3 mill. LT Interest \$39.4 mill.																			
Incl. \$4.0 mill. capitalized leases.																			
(LT Interest earned: 3.6x)																			
Leases, Uncapitalized Annual rentals \$ 8 mill.																			
Pension Assets-12/13 \$186.6 mill.																			
Oblig. \$225.1 mill.																			
Pfd Stock None																			
Common Stock 43,439,071 shs. as of 10/31/14																			
MARKET CAP: \$1.2 billion (Mid Cap)																			
ELECTRIC OPERATING STATISTICS																			
	2011	2012	2013																
% Change Retail Sales (KWH)	-2.3	-3.2	+1.3																
Avg. Industrial Use (MWH)	2,865	2,913	2,943																
Avg. Industrial Rev/KWH (¢)	7.72	7.86	7.93																
Capacity at Peak (MW)	1,392	1,391	1,377																
Peak Load, Summer (MW)	1,198	1,142	1,080																
Annual Load Factor (%)	52.0	52.2	56.2																
% Change Customers (avg.)	-1.5	+6	+5																
Fixed Charge Cov. (%)	307	314	331																
ANNUAL RATES																			
	Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'13																
of change (per sh)			to '17-'19																
Revenues	--	-1.5%	3.5%																
"Cash Flow"	3.0%	2.5%	5.5%																
Earnings	3.0%	2.5%	4.0%																
Dividends	-3.5%	-7.0%	4.5%																
Book Value	1.5%	1.5%	3.0%																

BUSINESS: The Empire District Electric Company supplies electricity to 169,000 customers in a 10,000 sq. mi. area in southwestern Missouri (90% of '13 retail elec. revs.), Kansas (5%), Oklahoma (3%), & Arkansas (2%). Acquired Missouri Gas (44,000 customers) 6/06. Supplies water service (4,000 customers) and has a small fiber-optics operation. Elec. rev. breakdown: residential, 43%; commercial, 30%; industrial, 15%; other, 12%. Generating sources: coal, 47%; gas, 24%; hydro, 1%; purch., 28%. Fuel costs: 34% of revenues. '13 reported depr. rate: 3.1%. Has about 750 employees. Chairman: D. Randy Laney. President & CEO: Bradley P. Beecher. Inc.: KS. Address: 602 S. Joplin Ave., P.O. Box 127, Joplin, MO 64802-0127. Tel.: 417-625-5100. Internet: www.empiredistrict.com.

Empire District Electric Company has a rate case pending in Missouri. The utility is seeking an electric rate increase of \$24.3 million (5.5%), based on a return of 10.15% on a common-equity ratio of 51.45%. The main reason for the filing is an environmental retrofit to the 189-megawatt Asbury coal-fired plant. This project is on track for completion in early 2015. The cost is trending towards the lower end of the estimated range of \$112 million-\$130 million. Empire District also wants to recoup higher expenses, such as property taxes, and start recovering transmission costs through its fuel adjustment clause. An order should come in July.

The utility has filed or plans to file rate cases in its other states. This will enable it to recover the portion of the Asbury project that is allocated to each state. Empire District has asked the Kansas commission for a rider on customers' bills. **Empire District received a rate hike in Arkansas.** Rates were raised by \$1.4 million, based on a 9.9% ROE. New tariffs took effect on September 26th. **Next year will be a challenging one for the company.** In 2014, earnings will probably advance, thanks to a strong first-quarter showing that was driven partly by favorable weather conditions. Our estimate is at the midpoint of Empire District's targeted range of \$1.50-\$1.60 a share. However, because the utility will incur some costs associated with the Asbury project before recovering them in rates, there will be some regulatory lag in 2015. Accordingly, we forecast a slight profit decrease.

The board of directors raised the dividend in the fourth quarter. The annual increase was modest, at \$0.02 a share (2%). The dividend is still well below its level before the board suspended it in 2011, following a tornado that devastated Joplin, Missouri. (The service area has made a solid recovery since then.) **The recent price is above our 2017-2019 Target Price Range.** We suspect that this is due to takeover speculation. Indeed, Empire District agreed to a buyout in 1999, but the deal fell through. The stock is untimely and has a lofty valuation, and we do not recommend that investors buy it for takeover possibilities.

Paul E. Debbas, CFA December 19, 2014

Cal-endar	QUARTERLY REVENUES (\$ mill.)				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2011	150.7	129.1	164.3	132.8	576.9
2012	137.2	131.6	159.2	129.1	557.1
2013	151.1	136.6	157.5	149.1	594.3
2014	179.7	149.8	171.5	159	660
2015	170	160	180	170	680

Cal-endar	EARNINGS PER SHARE ^A				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2011	.29	.22	.60	.21	1.31
2012	.23	.25	.60	.23	1.32
2013	.30	.27	.56	.35	1.48
2014	.48	.26	.55	.26	1.55
2015	.35	.25	.60	.30	1.50

Cal-endar	QUARTERLY DIVIDENDS PAID ^B [†]				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2010	.32	.32	.32	.32	1.28
2011	.32	.32	--	--	.64
2012	.25	.25	.25	.25	1.00
2013	.25	.25	.25	.255	1.01
2014	.255	.255	.255	.26	

1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC	17-19
325.5	386.2	413.5	490.2	518.2	497.2	541.3	576.9	557.1	594.3	660	680	Revenues (\$mill)	790						
21.8	23.8	39.9	33.2	39.7	41.3	47.4	55.0	55.7	63.4	65.0	65.0	Net Profit (\$mill)	85.0						
34.1%	33.4%	35.4%	30.3%	32.5%	32.5%	39.2%	38.4%	38.0%	37.1%	36.5%	37.5%	Income Tax Rate	37.5%						
1.0%	2.4%	10.7%	23.1%	31.5%	34.2%	21.5%	.9%	3.5%	9.4%	15.0%	9.0%	AFUDC % to Net Profit	7.0%						
51.3%	51.0%	49.7%	50.1%	53.8%	51.6%	51.3%	49.9%	49.1%	49.8%	50.5%	50.5%	Long-Term Debt Ratio	50.0%						
48.7%	49.0%	50.3%	49.9%	46.4%	48.4%	48.7%	50.1%	50.9%	50.2%	49.5%	49.5%	Common Equity Ratio	50.0%						
779.1	803.3	931.0	1081.1	1140.4	1240.3	1350.7	1386.2	1409.4	1493.6	1585	1635	Total Capital (\$mill)	1900						
857.0	896.0	1031.0	1178.9	1342.8	1459.0	1519.1	1563.7	1657.6	1751.9	1895	1980	Net Plant (\$mill)	2050						
4.7%	4.7%	5.9%	4.7%	5.2%	5.2%	5.1%	5.5%	5.4%	5.6%	5.5%	5.5%	Return on Total Cap'l	6.0%						
5.8%	6.0%	8.5%	6.2%	7.5%	6.9%	7.2%	7.9%	7.8%	8.5%	8.5%	8.0%	Return on Shr. Equity	9.0%						
5.8%	6.0%	8.5%	6.2%	7.5%	6.9%	7.2%	7.9%	7.8%	8.5%	8.5%	8.0%	Return on Com Equity ^E	9.0%						
NMF	NMF	.8%	NMF	NMF	NMF	NMF	4.1%	1.9%	2.7%	3.0%	2.5%	Retained to Com Eq	3.5%						
NMF	NMF	90%	117%	109%	109%	110%	49%	76%	68%	66%	71%	All Div'ds to Net Prof	62%						

(A) Diluted earnings. Excl. loss from discontinued operations: '06, 2¢; '11 & '12 EPS don't add due to rounding. Next earnings report due early Feb. (B) Div'ds historically paid in mid-Mar., June, Sept. and Dec. Div'ds suspended 3Q '11, reinstated 1Q '12. (C) Div'd reinvestment plan avail. (3% discount). (D) Shareholder investment plan avail. (C) Incl. intang. In '13: \$5.06/sh. (E) In mill. (F) Rate base: Deprec. orig. cost. Rate allowed on com. eq. in MO in '13: none specified; earned on avg. com. eq., '13: 8.7%. Regulatory Climate: Average.

Company's Financial Strength B++
Stock's Price Stability 95
Price Growth Persistence 30
Earnings Predictability 85

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ENTERGY CORP. NYSE-ETR				RECENT PRICE	83.98	P/E RATIO	17.4 (Trailing: 14.3 Median: 14.0)	RELATIVE P/E RATIO	0.94	DIV'D YLD	4.0%	VALUE LINE																																									
TIMELINESS	4	Lowered 12/5/14	High: 57.2	68.7	79.2	94.0	125.0	127.5	86.6	84.3	74.5	74.5	72.6	85.0	Target Price	2017	2018	2019																																			
SAFETY	3	Lowered 3/22/13	Low: 42.3	50.6	64.5	66.8	89.6	61.9	59.9	68.7	57.6	61.6	60.2	60.4																																							
TECHNICAL	4	Lowered 11/7/14	LEGENDS — 0.92 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession																																																		
BETA	.70	(1.00 = Market)	2017-19 PROJECTIONS Price Gain Ann'l Total High 100 (+20%) 8% Low 70 (-15%) Nil																																																		
Insider Decisions			Insider Decisions J F M A M J J A S to Buy 0 0 0 0 0 0 0 0 0 Options 0 6 0 3 4 2 0 2 1 to Sell 0 6 0 3 4 2 0 2 1																																																		
Institutional Decisions			Institutional Decisions 1Q2014 2Q2014 3Q2014 to Buy 245 237 241 to Sell 194 209 206 Hld's(000) 151069 156315 158821																																																		
© VALUE LINE PUB. LLC 17-19 % TOT. RETURN 11/14 THIS STOCK VL ARITHL. INDEX 1 yr. 41.9 8.0 3 yr. 37.8 72.4 5 yr. 35.0 119.8																																																					
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh	81.50																																		
46.57	35.51	45.61	43.59	37.34	40.17	46.69	46.61	53.94	59.47	69.15	56.82	64.27	63.67	57.94	63.86	69.80	70.35	"Cash Flow" per sh	20.75																																		
6.11	5.06	6.49	6.41	7.62	7.43	8.33	8.18	10.69	11.73	12.89	13.29	16.54	17.53	15.98	16.25	17.95	17.85	Earnings per sh ^A	6.75																																		
2.22	2.25	2.97	3.08	3.68	3.69	3.93	4.40	5.36	5.60	6.20	6.30	6.66	7.55	6.02	4.96	5.90	5.45	Div'd Decl'd per sh ^B + †	3.80																																		
1.50	1.20	1.22	1.28	1.34	1.60	1.89	2.16	2.16	2.58	3.00	3.00	3.24	3.32	3.32	3.32	3.32	3.32	Cap'l Spending per sh	15.50																																		
4.63	4.84	6.80	6.25	6.88	6.85	6.51	6.72	9.44	10.29	13.92	12.99	13.33	15.21	18.18	15.73	16.70	15.55	Book Value per sh ^C	65.75																																		
28.79	28.81	31.89	33.78	35.24	38.02	38.26	35.71	40.45	40.71	42.07	45.54	47.53	50.81	51.73	54.00	55.85	58.00	Common Shs Outst'g ^D	180.50																																		
246.83	247.08	219.60	220.73	222.42	228.90	216.83	216.83	202.67	193.12	189.36	189.12	178.75	176.36	177.81	178.37	180.50	180.50	Avg Ann'l P/E Ratio	12.5																																		
12.9	13.2	10.1	12.5	11.5	13.8	15.1	16.3	14.3	19.3	16.6	12.0	11.6	9.1	11.2	13.2	13.2	13.2	Relative P/E Ratio	.80																																		
.67	.75	.66	.64	.63	.79	.80	.87	.77	1.02	1.00	.80	.74	.57	.71	.74	.74	.74	Avg Ann'l Div'd Yield	4.5%																																		
5.2%	4.1%	4.1%	3.3%	3.2%	3.1%	3.2%	3.0%	2.8%	2.4%	2.9%	4.0%	4.2%	4.9%	4.9%	5.1%	5.1%	5.1%	<i>Bold figures are Value Line estimates</i>																																			
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$13643 mill. Due in 5 Yrs \$4832.9 mill. LT Debt \$11635 mill. LT Interest \$556.5 mill. Incl. \$814.2 mill. of securitization bonds. (LT interest earned: 3.2x) Leases, Uncapitalized Annual rentals \$106.2 mill. Pension Assets-12/13 \$4429.2 mill. Oblig. \$5771.0 mill. Pfd Stock \$304.8 mill. Pfd Div'd \$19.5 mill. 6,115,105 sh. 4.32%-8.25%, \$100 par; 1,000,000 sh. 8.95%; 250,000 sh. 8.75%, all without sinking fund. Common Stock 180,481,135 shs. as of 10/31/14 MARKET CAP: \$15 billion (Large Cap)																																																					
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BUSINESS: Entergy Corporation supplies electricity to 2.8 million customers through subsidiaries in Arkansas, Louisiana, Mississippi, Texas, and New Orleans (regulated separately from Louisiana). Distributes gas to 196,000 customers in Louisiana. Has a nonutility nuclear subsidiary that owns six units. Electric revenue breakdown: residential, 38%; commercial, 26%; industrial, 28%; other, 8%. Generating sources: nuclear, 33%; gas, 26%; coal, 12%; purchased, 29%. Fuel costs: 35% of revenues. '13 reported depreciation rate: 2.8%. Has 13,800 employees. Chairman & CEO: Leo Denault. Incorporated: Delaware. Address: 639 Loyola Avenue, P.O. Box 61000, New Orleans, Louisiana 70161. Telephone: 504-576-4000. Internet: www.entergy.com.																																																					
Entergy has announced a significant asset acquisition. Three of its utility subsidiaries (in Arkansas, Louisiana, and Texas) have agreed to pay \$948 million for a 1,980-megawatt gas-fired generating station. The purchase would help the utilities meet the rising demand for power in their service areas. The deal requires the approval of each state's regulatory commission and the Federal Energy Regulatory Commission. It is expected to be completed in late 2015.																																																					
Entergy is about to receive an order on its rate case in Mississippi. The utility filed for a \$49 million increase, based on a 10.59% return on equity, but reached a settlement calling for a \$16 million hike, based on a 10.07% ROE. New tariffs will take effect in 2015.																																																					
Earnings will probably wind up significantly higher in 2014. First-quarter profits were much higher than normal due to favorable weather conditions. The weather led to high and volatile power prices in the Northeast, which benefited Entergy's nonregulated operation and added \$0.90 a share to the bottom line.																																																					
We forecast lower profits in 2015. We assume normal weather patterns, which would almost certainly result in much lower earnings in the first quarter. Even so, Entergy should turn in a decent performance. The company's utilities are benefiting from growth in demand in their service territories. Entergy expects load growth of 3.0%-3.5% in 2015.																																																					
The future of the Indian Point nuclear station is still a cause for concern. Entergy wants to extend the two units' operating licenses by 20 years. However, officials in New York State want to shut down the plant, reduce its output, or force the company to install cooling towers, which would be costly.																																																					
The price of untimely Entergy stock has risen 33% in 2014. That's even better than most utility equities have fared in what has been an outstanding year for electric utilities. Despite the worries about Indian Point, there are signs that the long-term prospects of the nonregulated business are getting better. The dividend yield is about half of a percentage point above the industry average, but 3- to 5-year total return potential is unexciting.																																																					
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ANNUAL RATES of change (per sh) Revenues 4.5% "Cash Flow" 9.0% Earnings 6.0% Dividends 9.0% Book Value 4.0%			Past 10 Yrs. Past 5 Yrs. Est'd '11-'13 '11-'13			Past 5 Yrs. Past 5 Yrs. Est'd '11-'13 '11-'13			Past 5 Yrs. Past 5 Yrs. Est'd '11-'13 '11-'13			Past 5 Yrs. Past 5 Yrs. Est'd '11-'13 '11-'13			Past 5 Yrs. Past 5 Yrs. Est'd '11-'13 '11-'13																																						
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2014	.83	.83	.83	.83	3.32																																																

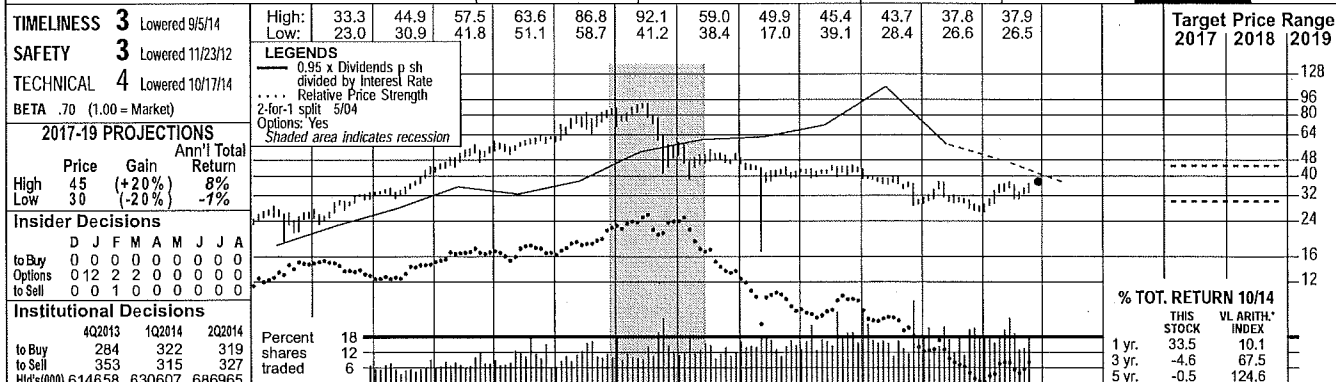
(A) Diluted EPS. Excl. nonrecurring gains (losses): '98, 78¢; '01, 15¢; '02, (\$1.04); '03, 33¢ net; '05, (21¢); '12, (\$1.26); '13, (\$1.14); '14, (48¢). Next earnings report due early Feb. (B) Div'ds historically paid in early Mar., June, Sept., and Dec. Div'd reinvestment plan available. † Shareholder investment plan available. (C) Incl. deferred charges. In '13: \$29.67/sh. (D) In millions. (E) Rate base: Net original cost. Allowed return on equity (blended): 10.4%; earned on avg. com. eq., '13: 9.3%. Regulatory Climate: Average. Company's Financial Strength B++ Stock's Price Stability 100 Price Growth Persistence 25 Earnings Predictability 85

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EXELON CORP. NYSE-EXC

RECENT PRICE **37.55** P/E RATIO **13.9** (Trailing: 17.0 Median: 15.0) RELATIVE P/E RATIO **0.76** DIV'D YLD **3.3%** VALUE LINE



1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC 17-19	
--	19.40	11.75	23.58	23.13	23.89	21.85	23.06	23.37	28.62	28.66	26.24	28.16	28.54	27.47	29.04	30.70	30.70	Revenues per sh	32.75
--	3.55	1.84	5.06	5.03	5.02	5.68	6.19	6.71	7.43	7.64	8.24	8.32	7.24	6.60	6.73	6.50	7.05	"Cash Flow" per sh	7.75
--	1.86	1.39	2.20	2.40	2.44	2.75	3.21	3.50	4.03	4.10	4.29	3.87	3.75	1.92	2.31	2.10	2.65	Earnings per sh ^A	3.25
--	--	--	.91	.88	.96	1.26	1.60	1.64	1.82	2.05	2.10	2.10	2.10	2.10	1.46	1.24	1.24	Div'd Decl'd per sh ^B	1.50
--	--	1.18	3.18	3.33	2.95	2.89	3.25	3.61	4.05	4.74	4.96	5.02	6.10	6.77	6.30	6.75	7.75	Cap'l Spending per sh	6.00
--	--	11.31	12.82	11.97	12.84	14.19	13.70	14.89	15.34	16.79	19.15	20.48	21.70	25.07	26.53	27.60	28.95	Book Value per sh ^C	33.75
--	630.20	638.01	642.01	646.63	662.00	664.20	666.00	670.00	661.00	658.00	660.00	662.00	663.00	855.00	857.00	860.00	863.00	Common Shs Outst'g ^D	900.00
--	--	22.4	13.2	10.5	11.8	13.0	15.4	16.5	18.2	18.0	11.5	11.0	11.3	19.1	13.4	<i>Bold figures are Value Line estimates</i>		Avg Ann'l P/E Ratio	11.0
--	--	1.46	.68	.57	.67	.69	.82	.89	.97	1.08	.77	.70	.71	1.22	.75			Relative P/E Ratio	.70
--	--	--	3.1%	3.5%	3.4%	3.5%	3.2%	2.8%	2.5%	2.8%	4.3%	4.9%	5.0%	5.7%	4.7%			Avg Ann'l Div'd Yield	4.2%

CAPITAL STRUCTURE as of 6/30/14
 Total Debt \$21449 mill. Due in 5 Yrs \$7832 mill.
 LT Debt \$18781 mill. LT Interest \$901 mill.
 Includes \$648 mill. nonrecourse transition bonds.
 (LT interest earned: 4.3x)
 Leases, Uncapitalized Annual rentals \$103 mill.
 Pension Assets-12/13 \$13571 mill.
 Pfd Stock \$193 mill. Pfd Div'd \$13 mill.
 Includes \$193 mill. in preferred securities of subsidiaries.
 Common Stock 859,197,443 shs.

14515	15357	15655	18916	18859	17318	18644	18924	23489	24888	26400	26500	29500
1844.0	2162.0	2370.0	2730.0	2721.0	2844.0	2567.0	2499.0	1579.0	1999.0	1955	2285	2865
27.5%	30.4%	33.7%	34.6%	32.6%	38.8%	39.2%	36.8%	32.4%	36.5%	25.0%	32.0%	32.0%
.9%	1.0%	1.6%	1.8%	1.3%	2.3%	2.1%	3.0%	5.8%	4.5%	5.0%	4.0%	3.0%
56.1%	56.1%	54.2%	53.9%	53.1%	47.2%	46.8%	45.7%	45.8%	44.4%	44.5%	44.0%	41.5%
43.5%	43.5%	45.4%	45.7%	46.6%	52.4%	52.9%	54.0%	53.5%	55.2%	55.5%	55.5%	58.0%
21658	20972	21971	22189	23726	24112	25651	26661	40057	41196	42925	44825	52300
21482	21981	22775	24153	25813	27341	29941	32570	45186	47330	49875	53225	59900
10.4%	12.1%	12.5%	14.1%	13.1%	13.3%	11.4%	10.6%	5.1%	5.9%	5.5%	6.0%	6.5%
19.4%	23.5%	23.6%	26.7%	24.4%	22.3%	18.8%	17.3%	7.3%	8.7%	7.5%	9.0%	9.5%
19.5%	23.6%	23.7%	26.9%	24.6%	22.5%	18.9%	17.3%	7.3%	8.7%	7.5%	9.0%	9.5%
10.7%	11.9%	13.0%	15.3%	12.5%	11.5%	8.7%	7.7%	NMF	3.2%	3.0%	5.0%	5.0%
45%	50%	45%	43%	49%	49%	54%	56%	109%	63%	56%	47%	47%

Revenues (\$mill) 29500
Net Profit (\$mill) 2865
Income Tax Rate 32.0%
AFUDC % to Net Profit 3.0%
Long-Term Debt Ratio 41.5%
Common Equity Ratio 58.0%
Total Capital (\$mill) 52300
Net Plant (\$mill) 59900
Return on Total Cap'l 6.5%
Return on Shr. Equity 9.5%
Return on Com Equity ^E 9.5%
Retained to Com Eq 5.0%
All Div'ds to Net Prof 47%

MARKET CAP: \$32 billion (Large Cap)

ELECTRIC OPERATING STATISTICS

	2011	2012	2013
% Change Retail Sales (KWH)	-2.0	+18.9	-5
Avg. Indust. Use (MWH)	N/A	N/A	N/A
Avg. Indust. Revs. per KWH (\$)	N/M F	N/M F	N/M F
Capacity at Peak (MW)	N/A	N/A	N/A
Peak Load (MW)	32736	32150	N/A
Nuclear Capacity Factor (%)	93.3	92.7	94.1
% Change Customers (yr-end)	+3	+23.6	+6

Fixed Charge Cov. (%) 569 293 338

ANNUAL RATES of change (per sh)

	Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'13 to '17-'19
Revenues	2.0%	1.0%	2.5%
"Cash Flow"	3.0%	-1.0%	2.0%
Earnings	1.5%	-7.5%	3.5%
Dividends	7.5%	.5%	-3.5%
Book Value	7.0%	9.5%	5.5%

BUSINESS: Exelon Corporation is a holding company for Commonwealth Edison (3.9 mill. elec. customers in IL), PECO Energy, (1.6 mill. elec., 501,000 gas customers in PA), & Baltimore Gas and Electric (1.2 mill. elec., 656,000 gas customers in MD). Has nonregulated generating & energy-marketing ops. Acqd Constellation Energy 3/12. Elec. rev. breakdown: res'l, 59%; small comm'l & ind'l, 24%; large comm'l & ind'l, 7%; other, 10%. Generating sources: nuclear, 57%; other, 15%; purch., 28%. Fuel costs: 43% of revs. '13 depr. rates: 2.9%-3.4% elec., 2.1% gas. Has 25,800 empls. Chairman: Mayo A. Shattuck III. Pres. & CEO: Christopher M. Crane. Inc.: PA. Address: 10 S. Dearborn St., P.O. Box 805379, Chicago, IL 60680-5379. Tel.: 312-394-7398. Internet: www.exeloncorp.com.

that Exelon is exiting the generating business—the company plans to build two gas-fired plants in Texas for \$1.4 billion. **Another purchase has been completed.** Exelon paid \$50 million, plus net working capital, for the retail energy services operation owned by Integrys Energy. The deal almost doubled the size of its business, to 2.5 million customers. **Exelon Generation is seeing positive signs.** Forward power prices for 2015 are higher than at the start of 2014. Also, proposals pending in the PJM power pool would raise capacity prices paid to owners of generating assets. **Baltimore Gas and Electric has reached a settlement of its rate case.** The agreement, subject to approval of the Maryland commission, calls for a total (electric and gas) rate hike of \$60 million and a \$20 million reduction in depreciation and amortization. **Exelon's improved prospects are reflected in the quotation.** The share price is up 37% since the start of 2014. The yield and 3- to 5-year total return potential are about average for a utility. *Paul E. Debbas, CFA November 21, 2014*

Exelon's proposed acquisition of Pepco Holdings has taken a small step forward. The agreement calls for Exelon to pay \$6.8 billion in cash for Pepco, which owns utilities in Washington, DC; the Delmarva Peninsula; and the southern third of New Jersey. Pepco shareholders voted in favor of the offer. The transaction still requires the approval of the regulators in DC, Delaware, Maryland, and New Jersey, along with the Federal Energy Regulatory Commission. The companies expect the takeover to be completed in the second or third quarter of 2015. Exelon anticipates the purchase to boost share net by \$0.10-\$0.15 in 2016 and \$0.15-\$0.20 in 2017, but our estimates and projections will not include Pepco until the deal has closed. **Exelon has already taken some steps to finance the acquisition.** The company executed a forward sale agreement for 57.5 million common shares. It has sold and is selling some noncore generating assets to raise \$1.4 billion. One sale produced a \$0.23-a-share nonrecurring gain in the third quarter, but another will result in a pretax loss of \$350 million-\$450 million this quarter. This hardly means

Cal-endar	QUARTERLY REVENUES (\$ mill.)				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2011	5052	4587	5295	3990	18924
2012	4686	5954	6565	6284	23489
2013	6082	6141	6502	6163	24888
2014	7237	6024	6912	6227	26400
2015	7000	6200	7000	6300	26500

Cal-endar	EARNINGS PER SHARE ^A				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2011	1.01	.93	.90	.91	3.75
2012	.54	.33	.57	.49	1.92
2013	.30	.57	.86	.59	2.31
2014	.10	.60	.92	.48	2.10
2015	.70	.60	.75	.60	2.65

Cal-endar	QUARTERLY DIVIDENDS PAID ^B				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2010	.525	.525	.525	.525	2.10
2011	.525	.525	.525	.525	2.10
2012	.525	.525	.525	.525	2.10
2013	.525	.31	.31	.31	1.46
2014	.31	.31	.31	.31	1.24

rounding. Next earnings report due early Feb. (B) Div'ds historically paid in early Mar., June, Sept., & Dec. ^D Div'd reinvestment plan avail. (C) Incl. def'd charges. ^E '13: \$10.79/sh. (D) In mill., adj. for split. (E) Rate allowed on com. eq. in IL in '11: 10.5%; in MD in '13: 9.75% elec., 9.6% gas; earned on avg. com. eq., '13: 9.1%. Regulat. Climate: PA, Avg.; IL, MD, Below Avg.

Company's Financial Strength	B++
Stock's Price Stability	90
Price Growth Persistence	15
Earnings Predictability	70

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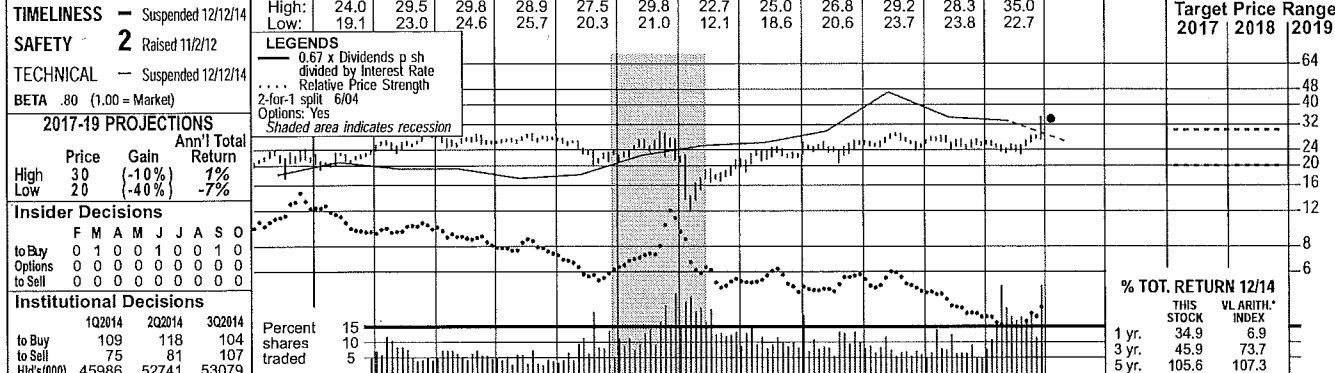
FIRSTENERGY NYSE-FE				RECENT PRICE	P/E RATIO		RELATIVE P/E RATIO		DIV'D YLD		VALUE LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
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SAFETY	3 Lowered 2/22/13	Low: 25.8	35.2	37.7	47.8	57.8	41.2	35.3	33.6	31.3	30.0	2017 2018 2019																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
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Chairman: George M. Smart. President & CEO: Anthony J. Alexander. COO: Richard R. Grigg, Inc.: OH. Address: 76 South Main Street, Akron, OH 44308-1890. Tel.: 800-736-3402. Internet: www.firstenergycorp.com. </td> </tr> <tr> <td colspan="13"> FirstEnergy is active in the regulatory arena. Indeed, the company has about six million customers in five states, plus a large electric transmission system. Jersey Central Power & Light is seeking a \$9.1 million rate increase, based on an 11% return on equity. The utility expects a rate order in the first quarter of 2015. FirstEnergy's four utilities in Pennsylvania filed for tariff hikes totaling \$415.7 million, based on a 10.9% ROE. Orders are expected in May. The company's utilities in West Virginia reached a regulatory settlement that, if approved, would raise rates by \$63 million on February 25th. 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Full Year		Mar.31	Jun.30	Sep.30	Dec.31		2011	3576	4060	4719	3903	16258	2012	3986	3757	4051	3500	15294	2013	3724	3512	4020	3647	14903	2014	4189	3496	3888	3627	15200	2015	4050	3750	4000	3700	15500	<table border="1"> <tr> <th>Cal-endar</th> <th colspan="4">EARNINGS PER SHARE ^A</th> <th>Full Year</th> </tr> <tr> <td></td> <td>Mar.31</td> <td>Jun.30</td> <td>Sep.30</td> <td>Dec.31</td> <td></td> </tr> <tr> <td>2011</td> <td>.15</td> <td>.48</td> <td>1.27</td> <td>d.09</td> <td>1.88</td> </tr> <tr> <td>2012</td> <td>.78</td> <td>.52</td> <td>1.05</td> <td>d.23</td> <td>2.13</td> </tr> <tr> <td>2013</td> <td>.51</td> <td>.47</td> <td>.88</td> <td>1.11</td> <td>2.97</td> </tr> <tr> <td>2014</td> <td>.34</td> <td>.27</td> <td>.79</td> <td>.70</td> <td>2.10</td> </tr> <tr> <td>2015</td> <td>.65</td> <td>.50</td> <td>.85</td> <td>.75</td> <td>2.75</td> </tr> </table>													Cal-endar	EARNINGS PER SHARE ^A				Full Year		Mar.31	Jun.30	Sep.30	Dec.31		2011	.15	.48	1.27	d.09	1.88	2012	.78	.52	1.05	d.23	2.13	2013	.51	.47	.88	1.11	2.97	2014	.34	.27	.79	.70	2.10	2015	.65	.50	.85	.75	2.75	<table border="1"> <tr> <th>Cal-endar</th> <th colspan="4">QUARTERLY DIVIDENDS PAID ^B</th> <th>Full Year</th> </tr> <tr> <td></td> <td>Mar.31</td> <td>Jun.30</td> <td>Sep.30</td> <td>Dec.31</td> <td></td> </tr> <tr> <td>2010</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>2.20</td> </tr> <tr> <td>2011</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>2.20</td> </tr> <tr> <td>2012</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>2.20</td> </tr> <tr> <td>2013</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>2.20</td> </tr> <tr> <td>2014</td> <td>.36</td> <td>.36</td> <td>.36</td> <td>.36</td> <td>1.44</td> </tr> </table>													Cal-endar	QUARTERLY DIVIDENDS PAID ^B				Full Year		Mar.31	Jun.30	Sep.30	Dec.31		2010	.55	.55	.55	.55	2.20	2011	.55	.55	.55	.55	2.20	2012	.55	.55	.55	.55	2.20	2013	.55	.55	.55	.55	2.20	2014	.36	.36	.36	.36	1.44
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC 17-19																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
24.72	27.19	31.31	26.88	40.83	37.31	37.76	36.35	36.03	42.00	44.70	41.70	43.76	38.87	36.57	35.60	36.10	36.60	Revenues per sh	39.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
5.33	6.89	7.28	5.48	6.45	4.79	7.60	7.55	7.22	8.34	9.04	8.80	8.50	5.75	6.05	6.30	5.55	6.25	"Cash Flow" per sh	6.75																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
1.95	2.50	2.69	2.84	2.54	1.47	2.77	2.84	3.82	4.22	4.38	3.32	3.25	1.88	2.13	2.97	2.10	2.75	Earnings per sh ^A	3.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
1.50	1.50	1.50	1.50	1.50	1.50	1.91	1.71	1.85	2.05	2.20	2.20	2.20	2.20	2.20	1.65	1.44	1.44	Div'd Decl'd per sh ^B	1.60																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
2.75	2.69	2.74	2.86	3.35	2.60	2.57	3.66	4.12	5.36	9.47	7.23	6.44	5.45	7.09	6.90	8.60	6.95	Cap'l Spending per sh	7.25																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
18.77	19.63	20.72	24.86	23.92	25.13	26.04	27.86	28.30	29.45	27.17	28.06	28.03	31.75	31.29	30.32	31.05	32.35	Book Value per sh ^C	36.25																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
237.07	232.45	224.53	297.64	297.64	329.84	329.84	329.84	319.21	304.84	304.84	304.84	304.84	418.22	418.22	418.63	421.00	423.50	Common Shs Outstg' ^D	431.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
15.4	11.3	9.2	10.9	13.0	22.5	14.1	16.1	14.2	15.6	15.6	13.0	11.7	22.4	21.1	13.1	13.1	13.1	Avg Ann'l P/E Ratio	12.5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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CAPITAL STRUCTURE as of 6/30/14 Total Debt \$21754 mill. Due in 5 Yrs \$9577 mill. LT Debt \$18415 mill. LT Interest \$965 mill. Incl. \$154 mill. capitalized leases. (LT interest earned: 2.6x) Leases, Uncapitalized Annual rentals \$202 mill. Pension Assets-12/13 \$6171 mill. Oblig. \$8263 mill. Pfd Stock None Common Stock 420,344,546 shs. as of 7/31/14 MARKET CAP: \$16 billion (Large Cap)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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BUSINESS: FirstEnergy Corp. is a holding company for Ohio Edison, Pennsylvania Power, Cleveland Electric, Toledo Edison, Metropolitan Edison, Penelec, Jersey Central Power & Light, West Penn Power, Potomac Edison, & Mon Power. Provides electric service to over 6 million customers in OH, PA, NJ, WV, MD, & NY. Acq'd Allegheny Energy 2/11. Electric revenue breakdown by customer class not available. Generating sources: coal, 44%; nuclear, 26%; purchased, 30%. Fuel costs: 43% of revs. '13 reported deprec. rate: 2.6%. Has 15,800 employees. Chairman: George M. Smart. President & CEO: Anthony J. Alexander. COO: Richard R. Grigg, Inc.: OH. Address: 76 South Main Street, Akron, OH 44308-1890. Tel.: 800-736-3402. Internet: www.firstenergycorp.com.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
FirstEnergy is active in the regulatory arena. Indeed, the company has about six million customers in five states, plus a large electric transmission system. Jersey Central Power & Light is seeking a \$9.1 million rate increase, based on an 11% return on equity. The utility expects a rate order in the first quarter of 2015. FirstEnergy's four utilities in Pennsylvania filed for tariff hikes totaling \$415.7 million, based on a 10.9% ROE. Orders are expected in May. The company's utilities in West Virginia reached a regulatory settlement that, if approved, would raise rates by \$63 million on February 25th. In Ohio, FirstEnergy proposed a three-year extension of its rate stabilization plan that is similar to the current one, which expires on May 31, 2016. As for transmission, FirstEnergy asked the Federal Energy Regulatory Commission to regulate operations that aren't held within one of its utilities through a forward-looking rate mechanism, effective at the start of 2015. Its allowed ROE on transmission would be 12.38%, which is attractive. All told, the company expects to spend \$4.2 billion on transmission from 2014 through 2017.																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
The focus on regulated businesses is a significant switch from a few years ago. Then, the company's main area of focus was its nonutility operations: merchant generation and retail energy services. However, declining margins in each of these businesses hurt FirstEnergy's profitability to the point where its board of directors cut the dividend, effective with the payment in the first quarter of 2014. The company is still in these businesses, but is shedding energy services customers that are small and weather-sensitive. In addition, the future of a large coal-fired station is in question after its bids in a recent auction were unsuccessful. Still, we expect the competitive operations to contribute to FirstEnergy's profit growth in 2015, and management expects them to generate cash in the next few years. Proposed changes in the PJM power pool would benefit FirstEnergy by raising capacity prices to owners of generating assets. FirstEnergy stock has a dividend yield that is slightly above the utility norm. Like most utility stocks, 3- to 5-year total return potential is low. <i>Paul E. Debbas, CFA November 21, 2014</i>																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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(A) Dil. EPS. Excl. nonrec. gain (losses): '05, (28¢); '09, (3¢); '10, (68¢); '11, 33¢; '12, (29¢); '13, (\$2.07); '14, (17¢); gains from disc. ops.: '05, 5¢; '13, 4¢; '14, 20¢. '11-'12 EPS don't add due to rounding or chng. in shs. Next eps. due late Feb. (B) Div'ds paid early Mar., June, Sep. & Dec. 5 div'ds decl. in '04, 3 in '13. ^A Div'd incl. avail. (C) Incl. intang.: In '13: \$19.76/sh. (D) In mill. (E) Rate base: Depr. orig. cost. Rates all'd on com. eq.: 9.75%-12.9%; earned on avg. com. eq.: '13: 9.3%. Reg. Climate: OH Above Avg.; PA, NJ Avg.; MD, WV Below Avg. Company's Financial Strength B+ Stock's Price Stability 90 Price Growth Persistence 25 Earnings Predictability 65 © 2014 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. To subscribe call 1-800-VALUELINE

GREAT PLAINS EN'GY NYSE-GXP				RECENT PRICE	P/E RATIO	(Trailing: 17.4 Median: 15.0)	RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE						
TIMELINESS 3 Lowered 9/19/14 SAFETY 3 Lowered 12/26/08 TECHNICAL 3 Raised 12/19/14 BETA .85 (1.00 = Market)				26.95	17.1		0.92	3.7%							
2017-19 PROJECTIONS Ann'l Total Price Gain Return High 30 (+10%) 6% Low 20 (-25%) -2%				LEGENDS 0.70 Dividends p sh divided by Interest Rate ... Relative Price Strength Options: Yes Shaded area indicates recession				Target Price Range 2017 2018 2019 64 48 40 32 24 20 16 12 8 6							
Insider Decisions J F M A M J J A S to Buy 0 0 0 0 0 0 0 0 0 Options 0 0 0 0 0 0 0 0 0 to Sell 0 0 0 0 0 0 0 0 0				Institutional Decisions 10/20/14 2/20/14 3/20/14 to Buy 111 125 124 to Sell 129 117 122 Hlds(000) 116846 118540 117299				% TOT. RETURN 11/14 THIS STOCK VLARTH. INDEX 1 yr. 14.3 8.0 3 yr. 39.8 72.4 5 yr. 80.5 119.8							
1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015				© VALUE LINE PUB. LLC 17-19											
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$389.2 mill. Due in 5 Yrs \$139.1 mill. LT Debt \$348.8 mill. LT Interest \$180.3 mill. (LT interest earned: 2.9x)				Leases, Uncapitalized Annual rentals \$15.3 mill. Pension Assets-12/13 \$703.0 mill. Oblig. \$1007.4 mill. Pfd Stock \$39.0 mill. Pfd Div'd \$1.6 mill. 390,000 shs. 3.80% to 4.50% (all \$100 par & cum.), callable from \$101 to \$103.70. Common Stock 154,124,361 shs. as of 11/3/14				MARKET CAP: \$4.2 billion (Mid Cap)				ELECTRIC OPERATING STATISTICS 2011 2012 2013 % Change Retail Sales (KWH) -1.7 -1.8 +2 Avg. Indust. Use (MWH) 146.3 144.3 142.4 Avg. Indust. Revs. per KWH (\$) 6.11 6.23 6.80 Capacity at Peak (Mw) 6697 6719 NA Peak Load, Summer (Mw) 5690 5653 NA Annual Load Factor (%) 50.5 49.6 NA % Change Customers (avg.) - - +2			
ANNUAL RATES Past Past Est'd '11-'13 of change (per sh) 10 Yrs. 5 Yrs. to '17-19 Revenues -5.0% -11.0% 3.5% "Cash Flow" -2.5% -5% 7.0% Earnings -3.5% -2.0% 6.0% Dividends -6.5% -12.5% 5.5% Book Value 5.0% 3.5% 2.5%				QUARTERLY REVENUES (\$ mill.) Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 492.9 565.1 773.7 486.3 2318.0 2012 479.7 603.6 746.2 480.4 2309.9 2013 542.2 600.3 765.0 538.8 2446.3 2014 585.1 648.4 782.5 584 2600 2015 600 650 850 600 2700				EARNINGS PER SHARE ^ Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 .01 .31 .91 .01 1.25 2012 d.07 .41 .95 .03 1.35 2013 .17 .41 .93 .11 1.62 2014 .15 .34 .95 .11 1.55 2015 .17 .35 .96 .12 1.60							
QUARTERLY DIVIDENDS PAID ^ Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2010 .2075 .2075 .2075 .2075 .84 2011 .2075 .2075 .2075 .2125 .83 2012 .2125 .2125 .2125 .2175 .86 2013 .2175 .2175 .2175 .23 .88 2014 .23 .23 .23 .245				BUSINESS: Great Plains Energy Incorporated is a holding company for Kansas City Power & Light and two other subsidiaries, which supply electricity to 831,000 customers in western Missouri (71% of revenues) and eastern Kansas (29%). Acq'd Aquila 7/08. Sold Strategic Energy (energy-marketing subsidiary) in '08. Electric revenue breakdown: residential, 42%; commercial, 40%; industrial, 9%; other, 9%. Generating sources: coal, 75%; nuclear, 11%; wind, 1%; gas & oil, 1%; purchased, 12%. Fuel costs: 27% of revs. '13 reported deprec. rate (utility): 3.0%. Has 3,000 employees. Chairman: Michael J. Chesser. President & CEO: Terry Bassham. Inc.: Missouri. Address: 1200 Main St., Kansas City, Missouri 64105. Tel.: 816-556-2200. Internet: www.greatplainsenergy.com.				One of Great Plains Energy's utility subsidiaries has filed a general rate case. Kansas City Power & Light asked the Missouri regulators for a tariff hike of \$120.9 million (15.8%), based on a return of 10.3% on a common-equity ratio of 50.36%. The utility is seeking to place environmental and nuclear upgrades in the rate base and recover higher expenses for property taxes and electric transmission. KCP&L also wants the commission to institute a fuel adjustment clause that would include transmission costs, and is requesting other regulatory mechanisms that would track things such as property taxes. (KCP&L already has a property-tax rider in Kansas.) This would reduce regulatory lag, which has been a big problem for the company for several years and has resulted in low returns on equity. New rates are expected to go into effect in late September of 2015. KCP&L will file a rate case in Kansas in early January, with new tariffs taking effect in October. Part of the aforementioned environmental upgrade is already included in the rate base, so this requested increase won't be as large as the one in Missouri.							
Fixed Charge Cov. (%) 211 235 267				Earnings probably won't make much progress until 2016. That will be the first full year after KCP&L's rate increases. Until the fourth quarter of 2015, the utility will continue to be affected by regulatory lag. We have trimmed our 2014 and 2015 earnings estimates by a nickel a share each year. Our revised 2014 estimate of \$1.55 a share is within the company's targeted range of \$1.52-\$1.62. The board of directors raised the dividend this quarter. The quarterly disbursement was boosted by \$0.015 a share (6.5%), slightly more than we had estimated. This was a bit above Great Plains' targeted dividend growth rate of 4%-6%. The company wants to maintain a payout ratio of 55%-70% through 2016, and 60%-70% thereafter. Note that the company's cash flow benefits from tax-loss carryforwards. The dividend yield, following the increase, is somewhat above the utility mean. Like most electric company stocks, the recent price is within our 2017-2019 Target Price Range, so 3- to 5-year total return potential is unimpressive.				Company's Financial Strength B+ Stock's Price Stability 95 Price Growth Persistence 5 Earnings Predictability 70							
(A) Dil. EPS. Excl. nonrec. gains (losses): '00, 49¢; '01, (\$2.01); '02, (5¢); '03, 29¢; '04, (7¢); '09, 12¢; gain (losses) on disc. ops.: '03, (13¢); '04, 10¢; '05, (3¢); '08, 35¢. '11-'12 EPS don't add due to change in shs. or rounding. Next earnings report due early Feb. (B) Div'd historically paid in mid-Mar., June, Sept. & Dec. Div'd reinvest. plan avail. (C) Incl. intang. In				*13: \$6.62/sh. (D) In mill. (E) Rate base: Fair value. Rate all'd on com. eq. in MO in '13: 9.7%; in KS in '13: 9.5%; earned on avg. com. eq., '13: 7.3%. Regulatory Climate: Average.				To subscribe call 1-800-VALUELINE							
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HAWAIIAN ELECTRIC NYSE:HE

RECENT PRICE **34.14** P/E RATIO **21.1** (Trailing: 20.0; Median: 19.0) RELATIVE P/E RATIO **1.15** DIV'D YLD **3.6%** VALUE LINE



Year	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Value Line Pub. LLC	17-19
Revenues per sh	23.12	23.64	26.05	24.26	22.46	23.49	23.85	27.36	30.21	30.40	35.56	24.96	28.14	33.76	34.46	31.98	31.05	29.05	Revenues per sh	33.75
"Cash Flow" per sh	3.23	3.35	3.08	3.33	3.52	3.54	3.09	3.22	3.19	3.01	2.72	2.59	2.88	3.18	3.28	3.22	3.35	3.40	"Cash Flow" per sh	4.00
Earnings per sh	1.48	1.45	1.27	1.60	1.62	1.58	1.36	1.46	1.33	1.11	1.07	.91	1.21	1.44	1.67	1.62	1.65	1.65	Earnings per sh	2.00
Div'd Decl'd per sh	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.24	Div'd Decl'd per sh	1.30
Cap'l Spending per sh	2.60	2.09	2.04	1.77	1.74	2.15	2.66	2.76	2.58	2.62	3.12	3.29	1.92	2.45	3.32	3.49	3.50	3.45	Cap'l Spending per sh	4.50
Book Value per sh	12.87	13.16	12.72	13.06	14.21	14.36	15.01	15.02	13.44	15.29	15.35	15.58	15.67	15.95	16.28	17.06	17.60	18.15	Book Value per sh	20.50
Common Shs Outstg	64.23	64.43	65.98	71.20	73.62	75.84	80.69	80.98	81.46	83.43	90.52	92.52	94.69	96.04	97.93	101.26	103.00	105.00	Common Shs Outstg	111.00
Avg Ann'l P/E Ratio	13.4	12.1	12.9	11.8	13.5	13.8	19.2	18.3	20.3	21.6	23.2	19.8	18.6	17.1	15.8	16.2	15.8	15.8	Avg Ann'l P/E Ratio	12.5
Relative P/E Ratio	.70	.69	.84	.60	.74	.79	1.01	.97	1.10	1.15	1.40	1.32	1.18	1.07	1.01	.91	.80	.80	Relative P/E Ratio	.80
Avg Ann'l Div'd Yield	6.2%	7.1%	7.5%	6.6%	5.7%	5.7%	4.8%	4.6%	4.6%	5.2%	5.0%	6.9%	5.5%	5.0%	4.7%	4.7%	4.8%	4.8%	Avg Ann'l Div'd Yield	5.1%

Year	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Value Line Pub. LLC	17-19
Total Debt	1924.1	2215.6	2460.9	2536.4	3218.9	2309.6	2665.0	3242.3	3375.0	3238.5	3200	3050	Revenues (\$mill)	3750						
LT Debt	109.6	120.3	109.9	93.6	92.2	84.9	115.4	140.1	164.9	163.4	170	175	Net Profit (\$mill)	235						
LT Interest	45.8%	36.4%	36.5%	35.4%	34.7%	34.1%	37.0%	35.1%	35.9%	34.0%	33.0%	33.0%	Income Tax Rate	31.5%						
Inc'l. \$50 mill.	7.6%	5.9%	8.4%	8.3%	14.2%	20.6%	7.4%	6.0%	6.9%	4.8%	17.0%	16.0%	AFUDC % to Net Profit	17.0%						
Leases, Uncapitalized Annual rentals	47.6%	45.2%	49.9%	47.6%	46.0%	48.0%	44.5%	44.9%	45.7%	44.0%	45.0%	46.5%	Long-Term Debt Ratio	50.0%						
Pension Assets-12/31	51.0%	53.3%	48.6%	51.0%	52.7%	50.7%	54.3%	53.9%	53.1%	55.0%	54.0%	52.5%	Common Equity Ratio	49.0%						
Pfd Stock	2375.1	2283.9	2252.7	2501.8	2635.2	2840.8	2732.9	2841.3	3001.0	3142.9	3355	3630	Total Capital (\$mill)	4625						
Pfd Div'd	2422.3	2542.8	2647.5	2743.4	2907.4	3088.6	3165.9	3334.5	3594.8	3858.9	4045	4220	Net Plant (\$mill)	4950						
1,114,657 shs.	6.0%	6.8%	6.4%	5.2%	4.7%	4.3%	5.6%	6.2%	6.7%	6.4%	6.0%	6.0%	Return on Total Cap'l	6.0%						
4 1/4% to 5 1/4%, \$20 par. call. \$20 to \$21; 120,000 shs. 7 1/2%, \$100 par. call. \$100.	8.8%	9.6%	9.7%	7.1%	6.5%	5.8%	7.6%	8.9%	10.1%	9.3%	9.0%	9.0%	Return on Shr. Equity	10.0%						
Sinking fund ends 2018.	8.9%	9.7%	9.9%	7.2%	6.5%	5.8%	7.7%	9.0%	10.2%	9.4%	9.5%	9.0%	Return on Com Equity	10.0%						
Common Stock 102,562,464 shs. as of 10/31/14	1.1%	1.5%	.7%	.8%	.5%	NMF	1.4%	2.1%	4.2%	3.7%	2.5%	2.0%	Retained to Com Eq	4.0%						
MARKET CAP: \$3.5 billion (Mid Cap)	87%	85%	93%	89%	93%	116%	82%	78%	59%	61%	75%	75%	All Div'ds to Net Prof	62%						

Year	2011	2012	2013
% Change Retail Sales (KWH)	-5	-3.5	-1.5
Avg. Indust. Use (MWH)	628.4	611.9	611.2
Avg. Indust. Rev. per KWH (\$)	27.89	30.35	29.31
Capacity at Year-end (Mw)	2327	2332	2354
Peak Load, Winter (Mw)	1530	1535	1535
Annual Load Factor (%)	74.8	72.1	71.0
% Change Customers (yr-end)	+3	+5	+8

BUSINESS: Hawaiian Electric Industries, Inc. is the parent company of Hawaiian Electric Company, Inc. (HECO) & American Savings Bank (ASB). HECO & its subs., Maui Electric Co. (MECO) & Hawaii Electric Light Co. (HELCO), supply electricity to 452,000 customers on O'ahu, Maui, Molokai, Lanai, & Hawaii. Operating companies' systems are not interconnected. Disc. intl power sub. in '01. Elec. rev. breakdown: res'l, 30%; comm'l, 35%; large light & power, 34%; other, 1%. Generating sources: oil, 56%; purchased, 44%. Fuel costs: 60% of revs. '13 reported depr. rate (util.): 3.1%. Has 4,000 empl. Chairman: Jeffrey N. Watanabe. Pres. & CEO: Constance H. Lau. Inc.: HI. Address: 1001 Bishop St., Suite 2900, Honolulu, HI 96808-0730. Tel.: 808-543-5662. Internet: www.hei.com.

Hawaiian Electric Industries has agreed to be acquired by NextEra Energy. NextEra is buying HEI's three utility subsidiaries. For each of their shares, HEI stockholders would receive 0.2413 of a share of NextEra stock (valued at \$26.28); a \$0.50-a-share special dividend; and a share of American Savings Bank. ASB would be spun off into a publicly traded company, subject to completion of the utility takeover. HEI estimates that the value of ASB stock would be \$8.00 a share. All told, the compensation to HEI stockholders would amount to \$34.78 a share. NextEra would also assume a tax liability estimated at \$1.60 a share stemming from the ASB spinoff. All of the compensation except the special dividend would be tax-free to HEI stockholders, who will vote on the deal. The transaction also requires the approval of the Hawaii Public Utilities Commission (PUC) and the Federal Energy Regulatory Commission. The companies expect the deal to close by late 2015.

What should HEI stockholders do? This depends on tax considerations. With the price of HEI stock just 2% below the value of NextEra's generous offer, there is little upside potential unless the price of NextEra stock continues to rise. However, selling the stock would create a capital gain. The Timeliness rank of HEI stock is suspended due to the takeover agreement. **The transformation of utilities in Hawaii is ongoing.** Last year, the PUC directed the company to put forth a proposal to increase the use of renewable energy and address the problem of high oil prices. Although oil prices have come down considerably since then (and customers had seen their bills decline by 20% by the end of 2014), the state still wants to reduce its dependence on foreign sources of energy. The rates customers are paying for their power are still well above the national average, even with lower oil prices. Meanwhile, the company wants to increase the monthly fixed charge for residential ratepayers. As more customers have placed solar panels on their buildings, nonsolar customers are subsidizing solar users. **We have trimmed our 2015 earnings estimate by \$0.05 a share.** HEI will likely incur some merger-related costs stemming from the deal with NextEra.

Paul E. Debbas, CFA January 30, 2015

Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year
2011	710.6	794.3	886.4	851.0	3242.3
2012	814.9	854.3	867.7	838.1	3375.0
2013	784.1	796.7	831.2	826.5	3238.5
2014	783.7	798.7	867.1	750.5	3200
2015	750	750	800	750	3050

(A) Dil. EPS. Excl. gains (losses) from disc. ops.: '00, (56¢); '01, (36¢); '03, (5¢); '04, 2¢; '05, (1¢); nonrec. gain (losses): '05, 11¢; '07, (9¢); '12, (25¢). Next earnings report due mid-Feb. (B) Div'ds historically paid in early Mar., June, Sept., & Dec. = Div'd reinvest. plan avail. (C) Incl. intang. In '13: \$5.81/sh. (D) In mill., adj. for split. (E) Rate base: Orig. cost. Rate allowed on com. eq. in '11: HECO, 10%; in '12: HELCO, 10%; in '13: MECO, 9%; earned on avg. com. eq., '13: 9.7%. Regul. Climate: Avg. (F) Excl. div'ds paid through reinvest. plan.

IDACORP, INC. NYSE-IDA				RECENT PRICE	68.20		P/E RATIO	18.6		(Trailing: 18.3 Median: 14.0)	RELATIVE P/E RATIO	1.01		DIV'D YLD	2.8%		VALUE LINE				
TIMELINESS	3	Lowered 12/12/14	High: 30.2	32.9	32.1	40.2	39.2	35.1	32.8	37.8	42.7	45.7	54.7	70.1			Target Price Range				
SAFETY	2	Raised 8/2/13	Low: 20.6	25.3	26.2	29.0	30.1	21.9	20.9	30.0	33.9	38.2	43.1	50.2			2017 2018 2019				
TECHNICAL	3	Raised 1/2/15	LEGENDS 1.00 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession																		
BETA	.80	(1.00 = Market)	2017-19 PROJECTIONS Ann'l Total Price Gain Return High 70 (5%) 3% Low 50 (-2.5%) -4%																		
Insider Decisions			F M A M J J A S O to Buy 0 0 0 0 1 0 0 0 0 Options 2 0 0 0 0 0 0 0 0 to Sell 2 3 0 2 2 0 4 1 1																		
Institutional Decisions			1Q2014 2Q2014 3Q2014 to Buy 92 86 70 to Sell 84 106 106 Hid's(000) 37877 36553 36655																		
Percent shares traded			15 10 5																		
% TOT. RETURN 12/14			THIS STOCK VL ARITHM INDEX 1 yr. 31.8 6.9 3 yr. 71.7 73.7 5 yr. 143.3 107.3																		
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC	17-19		
29.83	17.50	27.10	150.10	24.43	20.41	20.00	20.15	21.23	19.51	20.47	21.92	20.97	20.55	21.55	24.81	24.50	25.10	Revenues per sh	27.10		
4.69	4.50	5.63	5.63	4.08	3.50	4.12	3.87	4.58	4.11	4.27	5.07	5.23	5.74	5.84	6.21	6.25	6.40	"Cash Flow" per sh	6.90		
2.37	2.43	3.50	3.35	1.63	.96	1.90	1.75	2.35	1.86	2.18	2.64	2.95	3.36	3.37	3.64	3.75	3.60	Earnings per sh A	3.75		
1.86	1.86	1.86	1.86	1.86	1.70	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.20	1.37	1.57	1.76	1.90	Div'd Decl'd per sh B†	2.20		
2.37	2.95	3.73	4.78	3.53	3.89	4.73	4.53	5.16	6.39	5.19	5.26	6.85	6.76	4.78	4.68	5.70	6.45	Cap'l Spending per sh	12.95		
19.42	20.02	21.82	23.15	23.01	22.54	23.88	24.04	25.77	26.79	27.76	29.17	31.01	33.19	35.07	36.84	38.60	40.30	Book Value per sh C	44.90		
37.61	37.61	37.61	37.63	38.02	38.34	42.22	42.66	43.63	45.06	46.92	47.90	49.41	49.95	50.16	50.23	50.20	50.20	Common Shs Outst'g D	50.20		
14.4	12.7	10.9	11.4	18.9	26.5	15.5	16.7	15.1	18.2	13.9	10.2	11.8	11.5	12.4	13.4	15.1	15.1	Avg Ann'l P/E Ratio	16.0		
.75	.72	.71	.58	1.03	1.51	.82	.89	.82	.97	.84	.68	.75	.72	.79	.75	.79	.79	Relative P/E Ratio	1.00		
5.4%	6.0%	4.9%	4.9%	6.0%	6.7%	4.1%	4.1%	3.4%	3.5%	4.0%	4.5%	3.4%	3.1%	3.3%	3.2%	3.1%	3.1%	Avg Ann'l Div'd Yield	3.6%		
CAPITAL STRUCTURE as of 9/30/14				844.5	859.5	926.3	879.4	960.4	1049.8	1036.0	1026.8	1080.7	1246.2	1250	1260	Revenues (\$mill)	1360				
Total Debt \$1615.4 mill. Due in 5 Yrs \$124.3 mill.				77.8	63.7	100.1	82.3	98.4	124.4	142.5	166.9	168.9	182.4	180	180	Net Profit (\$mill)	190				
LT Debt \$1614.3 mill. LT Interest \$81.5 mill.				--	16.9%	13.3%	14.3%	16.3%	15.2%	--	--	13.4%	28.3%	24.0%	25.0%	Income Tax Rate	30.0%				
(LT interest earned: 6.3x)				3.9%	4.7%	4.0%	9.7%	10.2%	10.5%	19.7%	22.8%	7.1%	4.2%	7.5%	AFUDC % to Net Profit	9.5%					
Pension Assets-12/13 \$545.1 mill.				49.3%	50.0%	45.2%	48.9%	47.6%	50.2%	49.3%	45.6%	45.5%	46.6%	48.0%	Long-Term Debt Ratio	48.5%					
Oblig. \$695.1 mill.				50.7%	50.0%	54.8%	51.1%	52.4%	49.8%	50.7%	54.4%	54.5%	53.4%	52.0%	Common Equity Ratio	51.5%					
Pfd Stock None				1987.8	2048.8	2052.8	2364.2	2485.9	2807.1	3020.4	3045.2	3225.4	3465.9	3715	3890	Total Capital (\$mill)	4415				
Common Stock 50,268,748 shs.				2209.5	2314.3	2419.1	2616.6	2758.2	2917.0	3161.4	3406.6	3536.0	3665.0	3900	4095	Net Plant (\$mill)	4740				
as of 10/24/14				5.3%	4.5%	6.2%	4.7%	5.3%	5.7%	6.0%	6.7%	6.5%	6.4%	6.0%	5.5%	Return on Total Cap'l	5.0%				
MARKET CAP: \$3.4 billion (Mid Cap)				7.7%	6.2%	8.9%	6.8%	7.6%	8.9%	9.3%	10.1%	9.6%	9.9%	9.0%	9.0%	Return on Shr. Equity	8.5%				
ELECTRIC OPERATING STATISTICS				7.2%	6.2%	8.9%	6.8%	7.6%	8.9%	9.3%	10.1%	9.6%	9.9%	9.0%	9.0%	Return on Com Eq	8.5%				
2011 2012 2013				2.7%	1.3%	4.3%	2.4%	3.4%	4.8%	5.5%	6.5%	5.7%	5.6%	4.5%	4.0%	Retained to Com Eq	3.5%				
% Change Retail Sales (KWH)				65%	80%	51%	64%	55%	46%	41%	36%	41%	43%	51%	53%	All Div'ds to Net Prof	58%				
Avg. Indust. Use (MWH)				BUSINESS: IDACORP, Inc. is the holding company for Idaho Power, a utility that operates 17 hydroelectric generation developments, 3 natural gas-fired plants, and partly owns three coal plants across Idaho, Oregon, Wyoming, and Nevada. Service territory covers 24,000 square miles, serving 501,000 business customers. Sells electricity in Idaho (95% of revenues) and Oregon (5%). Revenue breakdown: residential, 40%; commercial, 22%; industrial, 14%; other, 24%. Fuel sources: hydro, 45%; thermal, 34%; purchased power, 21%. '13 depr rate: 2.4%. Has 2,067 employees. Chairman: Robert A. Tinstman. President & CEO: Darrel T. Anderson. Incorp: Idaho. Address: 1221 W. Idaho St., Boise, ID 83702. Telephone: 208-388-2200. Internet: www.idacorpinc.com.																	
Avg. Indust. Revs. per KWH (\$)				We are raising our 2014 share-net estimate for IDACORP. Third-quarter results were above our expectations. Better than expected results were due to slightly improved weather in the September period. Customer growth has also aided sales volume, as it has helped to offset lower usage among the company's residential and irrigation customer categories. However, earnings in the September period were primarily impacted by lower income tax expense. This was due to a tax method change related to Idaho Power's capitalized repairs reduction. IDACORP recently raised its guidance for 2014 to reflect the lower tax expense. The company expects 2014 earnings to be in the range of \$3.70 to \$3.80 per share, higher than the previous guidance of \$3.50 to \$3.65 per share. In accordance, we have raised our 2014 estimate to \$3.75 per share. Looking ahead, the method change is expected to result in a small amount of continued benefit, depending on the nature of annual capital additions at Idaho Power. IDACORP expects more clarity on this in the next quarter.																	
Capacity at Peak (Mw)				its 2015 Integrated Resource Plan. The plan is expected to indicate a modest increase in the average and peak load growth from the company's earlier IRP in 2013. The completed Integrated Resource Plan is expected to be filed with the Idaho Public Utility Commission by June 2015.																	
Peak Load, Summer (Mw)				A dividend hike is likely in 2015. The company's dividend policy seeks to maintain a payout ratio between 50% and 60%. The board of directors recently increased the dividend payout in September, 2014 by 9.3%. The dividend should continue to see an improvement until IDACORP reaches the upper end of the payout range.																	
Annual Load Factor (%)				These shares do not stand out at this juncture. Based on the stock's current Timeliness rank, it is expected to be an average performer over the next six to 12 months. However, appreciation potential over the next 3- to 5-year period is limited, as the stock price is already at the top of our three- to five-year Target Price Range. Additionally, although further dividend increases are likely, the company's current dividend yield is presently below the average yield of 3.3% for electric utilities.																	
% Change Customers (yr-end)				Idaho Power is currently working on																	
Fixed Charge Cov. (%)				19.4	28.3	32.9														Saumya Ajila	January 30, 2015
ANNUAL RATES				Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'13 to '17-'19															
of change (per sh)				-10.0%	2.0%	3.5%															
Revenues				3.0%	6.5%	2.5%															
"Cash Flow"				5.5%	10.0%	1.5%															
Earnings				-2.5%	3.0%	8.0%															
Dividends				4.5%	5.5%	4.0%															
Book Value																					
Cal-endar	QUARTERLY REVENUES(\$ mill.)					Full Year															
	Mar.31	Jun.30	Sep.30	Dec.31																	
2011	251.5	235.0	309.6	230.7	1026.8																
2012	241.1	254.7	334.0	250.9	1080.7																
2013	264.9	303.9	381.1	296.3	1246.2																
2014	292.7	317.7	382.2	257.4	1250																
2015	290	305	385	280	1260																
Cal-endar	EARNINGS PER SHARE A					Full Year															
	Mar.31	Jun.30	Sep.30	Dec.31																	
2011	.60	.42	2.16	.18	3.36																
2012	.50	.71	1.84	.33	3.37																
2013	.70	.93	1.46	.55	3.64																
2014	.55	.89	1.73	.58	3.75																
2015	.60	.75	1.85	.40	3.60																
Cal-endar	QUARTERLY DIVIDENDS PAID B†					Full Year															
	Mar.31	Jun.30	Sep.30	Dec.31																	
2011	.30	.30	.30	.30	1.20																
2012	.33	.33	.33	.38	1.37																
2013	.38	.38	.38	.43	1.57																
2014	.43	.43	.43	.47	1.76																
2015																					

(A) EPS diluted. Excl. nonrecurring gains (loss): '00, 22¢; '03, 26¢; '05, (24¢); '06, 17¢. Egs. may not sum to total due to rounding. Next earnings report due in late February. (B) Div'ds historically paid in late Feb., May, Aug., and late Nov. ■ Div'd reinvestment plan avail. † Shareholder investment plan avail. (C) Incl. deferred debits. In '13: \$21.06/sh. (D) In mill. (E) Rate Base: Net original cost. Rate allowed on com. eq. in Idaho in '11: 9.5%-10.5%; earned on avg. system com. eq., '13: 9.6%. Regulatory Climate: Above Average.

Company's Financial Strength B++
 Stock's Price Stability 95
 Price Growth Persistence 80
 Earnings Predictability 90

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INTEGRYS ENERGY NYSE-TEG				RECENT PRICE	P/E RATIO	Trailing: 18.7 Median: 15.0	RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE								
TIMELINESS — Suspended 7/4/14 SAFETY 2 Raised 6/24/11 TECHNICAL — Suspended 7/4/14 BETA .80 (1.00 = Market)				76.03	25.0		1.35	3.6%									
2017-19 PROJECTIONS Price: High 65, Low 45 Gain: (-15%), Return: (-4%) Ann'l Total: Nil, -7%										Target Price 2017: 120 Target Price 2018: 100 Target Price 2019: 80 Target Price 2020: 64 Target Price 2021: 48 Target Price 2022: 32 Target Price 2023: 24 Target Price 2024: 20 Target Price 2025: 16 Target Price 2026: 12 Target Price 2027: 8							
Insider Decisions J F M A M J J A S to Buy: 0 0 0 0 0 0 0 0 0 Options: 0 10 0 1 0 3 0 1 5 to Sell: 0 0 2 1 0 3 0 2 5				Institutional Decisions 1Q2014 2Q2014 3Q2014 to Buy: 168 140 138 to Sell: 142 170 148 Hid's(000): 42754 43525 44422						Percent shares traded: 24, 16, 8							
IntegrYS Energy Group was created as a holding company on February 21, 2007 to oversee the entire operations of the recently merged WPS Resources and Peoples Energy. WPS acquired Peoples in an agreement under which each common share of Peoples was converted into .825 share of WPS common. The combination took the new name of IntegrYS Energy Group. All data on this page prior to 2/21/07 are for WPS Resources only.				2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh 53.75 "Cash Flow" per sh 8.00 Earnings per sh A 3.75 Div'd Decl'd per sh B 2.72 Cap'l Spending per sh 11.25 Book Value per sh C 45.00 Common Shs Outst'g D 80.00 Avg Ann'l P/E Ratio 14.5 Relative P/E Ratio .95 Avg Ann'l Div'd Yield 5.0%	
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$3348.8 mill. Due in 5 Yrs \$780.7 mill. LT Debt \$2956.3 mill. LT Interest \$147.8 mill. (LT interest earned: 4.9x) Leases, Uncapitalized Annual rentals \$6.7 mill. Pension Assets-12/13 \$1527.7 mill. Pfd Stock \$51.1 mill. Pfd Div'd \$3.1 mill. 510,626 shs. 5.00% to 6.88%, callable \$101 to \$107.50; sinking fund began 11/1/79. All cumulative, \$100 par. Common Stock 79,963,091 shs. as of 11/4/14 MARKET CAP: \$6.1 billion (Large Cap)				4890.6	6962.7	6890.7	10292	14048	7499.8	5203.2	4708.7	4212.4	5634.6	6600	3850	270	Revenues (\$mill) 4300 Net Profit (\$mill) 310 Income Tax Rate 37.0% AFUDC % to Net Profit 2.0% Long-Term Debt Ratio 48.5% Common Equity Ratio 50.5% Total Capital (\$mill) 7125 Net Plant (\$mill) 9500 Return on Total Cap'l 5.5% Return on Shr. Equity 8.5% Return on Com Equity E 8.5% Retained to Com Eq 2.5% All Div'ds to Net Prof 71%
ELECTRIC OPERATING STATISTICS 2011 2012 2013 % Change Retail Sales (KWH) +9 +2 -4 Avg. C & I Use (KWH) N/A N/A N/A Avg. C & I Revs. per KWH (\$) N/A N/A N/A Capacity at Peak (Mw) 3312 3173 3344 Peak Load, Summer (Mw) 2465 2347 2400 Annual Load Factor (%) N/A N/A N/A % Change Customers (yr-end) +4 +4 +4				BUSINESS: IntegrYS Energy Group, Inc. is a holding company for Wisconsin Public Service, Peoples Gas, and four other utility subsidiaries. Has 497,000 electric customers in WI and MI, 1.7 million gas customers in WI, IL, MN, and MI. Also has retail electric and gas marketing ops. in the Northeast and Midwest. Elec. rev. breakdown: residential, 29%; small commercial & industrial, 29%; large commercial & industrial, 19%; other, 23%. Generating sources: coal, 53%; gas, 9%; wind, 2%; hydro, 2%; purch., 34%. Fuel costs: 62% of revs. '13 depr. rates (utility): 1.9%-3.3%. Has 4,900 emp. Chairman & CEO: Charles A. Schrock. Pres. & COO: Lawrence T. Borgard. Inc.: WI. Address: 130 East Randolph St., Chicago, IL 60601-6207. Tel.: 312-228-5400. Internet: www.integrysgroup.com.													
ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Est'd '11-'13 of change (per sh) NMF to '17-'19 Revenues -4.5% -17.5% NMF "Cash Flow" 2.0% 5.0% 2.5% Earnings 3.0% 7.5% .5% Dividends 2.5% 1.5% Nil Book Value 4.5% -- 2.5%				IntegrYS Energy shareholders have approved the sale of the company to Wisconsin Energy. The agreement calls for IntegrYS holders to receive \$18.58 in cash and 1.128 shares of Wisconsin Energy stock for each of their shares, making the value of the deal \$76.05 a share at Wisconsin Energy's recent price. The deal requires the approval of the regulatory commissions in Wisconsin, Illinois, and Michigan (and perhaps Minnesota, too), plus the Federal Energy Regulatory Commission. The company expects the transaction to close in the summer of 2015. Due to the takeover agreement, the Timeliness rank of IntegrYS stock is suspended. We think IntegrYS holders should sell their stock on the open market. The recent price is almost equal to the value of the deal, leaving no upside potential for stockholders unless the price of Wisconsin Energy stock continues to rise. On the other hand, the stock price will likely drop sharply if the transaction falls through. IntegrYS has completed the sale of its retail energy services business. Heavy competition has squeezed margins here. The company received over \$300 million.													
QUARTERLY REVENUES (\$mill.) Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 1627.1 1010.8 938.7 1132.1 4708.7 2012 1247.9 839.6 927.7 1197.2 4212.4 2013 1678.2 1116.0 1129.7 1710.7 5634.6 2014 2925 1433 1188 1054 6600 2015 1250 850 650 1100 3850				IntegrYS will report this as a discontinued operation effective with the fourth-quarter earnings release, but we haven't yet restated results for the first three quarters of 2014. This segment earned \$0.33 a share in the first nine months of 2014 (excluding a goodwill impairment and including some small assets that IntegrYS is retaining). Note that our earnings presentation includes costs related to the buyout, estimated at \$0.09 a share in 2014. Some of IntegrYS' utilities are awaiting rate orders. A gas rate hike of \$7.6 million was granted in Minnesota, with an allowed return on equity of 9.35%. Wisconsin Public Service should soon get a written order calling for an electric rate increase of \$25 million and a gas rate decrease of \$15 million, based on a 10.2% ROE. The utility has asked the Michigan regulators for a \$5.7 million electric tariff hike, based on a 10.6% ROE. Interim rates should take effect in mid-April, with a final order in mid-October. The company's two gas utilities in Illinois are seeking a total of \$107.0 million, based on a 10.25% ROE. A decision is expected next month. Paul E. Debbas, CFA December 19, 2014													
EARNINGS PER SHARE A Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 1.56 .38 .47 .48 2.88 2012 1.24 .65 .93 .86 3.67 2013 2.29 d.06 .47 1.63 4.33 2014 1.89 .17 .37 .92 3.35 2015 1.35 .40 .45 .95 3.15				QUARTERLY DIVIDENDS PAID B Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2010 .68 .68 .68 .68 2.72 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													

(A) Dil. EPS. Excl. nonrecurr. gain (losses): '09, (\$3.24); '10, (41¢); '14, 56¢ net; gains (losses) from disc. ops.: '07, \$1.02; '08, 6¢; '09, 4¢; '11, (1¢); '12, (12¢); '13, 6¢; '14, 1¢. '11 & '12 EPS don't add due to rounding. Next egs. report due late Feb. (B) Div'ds histor. paid mid-Mar., June, Sept., & Dec. (C) Div'd reinv. plan avail. (D) Incl. intang. In '13: \$26.11/sh. (E) Rate base: Net orig. cost. Rate all'd on com. eq. in WI in '13: 10.3%; in IL in '13: 9.28%; in MN in '14: 9.35%; earn. on avg. com. eq. '13: 10.8%. Reg. Clm.: WI, Above Avg.; IL, Below Avg.

Company's Financial Strength A
 Stock's Price Stability 90
 Price Growth Persistence 40
 Earnings Predictability 45

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MGE ENERGY INC. NDQ:MGE				RECENT PRICE	P/E RATIO 20.2 (Trailing: 20.2 Median: 16.0)								RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE				
TIMELINESS 4 Lowered 12/15/14 SAFETY 1 New 1/3/03 TECHNICAL 4 Lowered 12/19/14 BETA .70 (1.00 = Market)				High: 23.9 Low: 16.7	24.3 18.4	25.8 20.3	24.7 19.5	24.8 19.6	24.3 18.6	25.5 18.2	29.1 21.4	31.9 24.7	37.4 28.7	40.5 33.4	46.5 35.7	Target Price Range 2017 2018 2019			
2017-19 PROJECTIONS Ann'l Total Price Gain Return High 55 (+20%) 7% Low 45 (-5%) 2%																% TOT. RETURN 11/14 THIS STOCK VL ARITH' INDEX 1 yr. 21.3 8.0 3 yr. 61.5 72.4 5 yr. 127.1 119.8			
Insider Decisions J F M A M J J A S to Buy 0 0 1 0 1 0 0 0 0 Options 0 0 0 0 0 0 0 0 0 to Sell 0 0 0 0 0 0 0 0 0				Institutional Decisions 1Q2014 2Q2014 3Q2014 to Buy 66 55 43 to Sell 49 53 62 Hlds(000) 11510 11517 11389												Percent shares traded 6 4 2			
© VALUE LINE PUB. LLC 17-19																			
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	17-19	
10.35	11.30	13.00	13.03	13.17	14.59	13.89	16.73	16.13	16.33	17.35	15.40	15.36	15.76	15.61	17.04	17.85	18.55	Revenues per sh	21.55
2.39	2.54	2.59	2.52	2.22	1.96	1.92	2.00	2.34	2.46	2.68	2.66	2.76	2.94	2.98	3.28	3.45	3.70	"Cash Flow" per sh	4.85
.92	.99	1.11	1.08	1.13	1.14	1.18	1.05	1.37	1.51	1.59	1.47	1.67	1.76	1.86	2.16	2.25	2.40	Earnings per sh ^A	3.20
.86	.87	.88	.89	.89	.90	.91	.92	.93	.94	.96	.97	.99	1.01	1.04	1.07	1.11	1.15	Div'd Decl'd per sh ^B	1.30
1.28	2.11	2.96	1.65	2.97	3.02	3.13	2.80	2.94	4.14	3.08	2.35	1.76	1.88	2.84	3.43	2.55	3.15	Cap'l Spending per sh	4.70
7.56	7.66	8.04	8.45	8.62	9.56	11.06	11.21	11.93	12.99	13.92	14.47	15.14	15.89	16.71	17.81	18.85	20.00	Book Value per sh ^E	23.60
24.12	24.24	24.93	25.61	26.36	27.52	30.59	30.68	31.46	32.93	34.36	34.67	34.67	34.67	34.67	34.67	35.00	35.00	Common Shs Outst'g ^C	36.00
16.2	14.0	11.7	14.8	16.0	17.5	18.0	22.4	15.9	15.0	14.2	15.1	15.0	15.8	17.2	17.0	17.0	17.0	Avg Ann'l P/E Ratio	15.0
.84	.80	.76	.76	.87	1.00	.95	1.19	.86	.80	.85	1.01	.95	.99	1.09	.96	.96	.96	Relative P/E Ratio	.95
5.8%	6.3%	6.7%	5.5%	5.0%	4.5%	4.3%	3.9%	4.3%	4.1%	4.2%	4.4%	4.0%	3.6%	3.2%	2.9%	2.9%	2.9%	Avg Ann'l Div'd Yield	2.7%
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$400.5 mill. Due in 5 Yrs \$71.5 mill. LT Debt \$396.3 mill. LT Interest \$19.0 mill. (LT interest earned: 7.5x)				424.9	513.4	507.5	537.6	596.0	533.8	532.6	546.4	541.3	590.9	625	650	Revenues (\$mill)	775		
Leases, Uncapitalized Annual rentals \$1.7 mill. Pension Assets-12/13 \$277.4 mill. Obligation \$284.0 mill.				33.8	32.1	42.4	48.8	52.8	51.0	57.7	60.9	64.4	74.9	80.0	85.0	Net Profit (\$mill)	115		
Pfd Stock None				37.9%	38.2%	37.9%	36.3%	35.5%	35.6%	36.9%	37.1%	37.7%	37.5%	36.0%	35.0%	Income Tax Rate	35.0%		
Common Stock 34,668,370 shs. as of 10/31/14 MARKET CAP: \$1.6 billion (Mid Cap)				--	--	--	--	--	--	--	--	--	--	--	--	AFUDC % to Net Profit	2.0%		
ELECTRIC OPERATING STATISTICS				37.4%	39.3%	38.7%	35.2%	36.3%	39.0%	38.9%	39.6%	38.2%	39.3%	39.0%	38.5%	Long-Term Debt Ratio	36.5%		
% Change Retail Sales (KWH) 2011 +0.8 2012 -0.3 2013 -0.8 Avg. Indust. Use (MWH) 2,632 2,472 2,502 Avg. Indust. Revs. per KWH (\$) 7.33 7.86 7.94 Capacity at Peak (Mw) N/A N/A N/A Peak Load, Summer (Mw) 770 766 783 Annual Load Factor (%) N/A N/A N/A % Change Customers (avg.) N/A N/A N/A				62.6%	60.7%	61.3%	64.8%	63.7%	61.0%	61.1%	60.4%	61.8%	60.7%	61.0%	61.5%	Common Equity Ratio	63.5%		
Fixed Charge Cov. (%) 53.5 57.9 67.6				540.5	566.2	612.6	660.1	750.6	822.7	859.4	911.9	937.9	1016.9	1080	1140	Total Capital (\$mill)	1335		
ANNUAL RATES of change (per sh)				607.4	667.7	728.4	844.0	901.2	939.8	968.0	995.6	1073.5	1160.2	1215	1275	Net Plant (\$mill)	1600		
Revenues 1.5% Past 10 Yrs -5% Past 5 Yrs 5.0% Est'd '11-'13 to '17-'19 5.0%				7.1%	6.6%	7.8%	8.1%	7.7%	6.9%	7.6%	7.8%	7.9%	8.3%	8.5%	8.5%	Return on Total Cap'l	9.5%		
"Cash Flow" 3.0% 4.0% 8.0%				10.0%	9.3%	11.3%	11.4%	11.0%	10.2%	11.0%	11.1%	11.1%	12.1%	12.0%	12.0%	Return on Shr. Equity	13.5%		
Earnings 5.5% 5.5% 9.0%				10.0%	9.3%	11.3%	11.4%	11.0%	10.2%	11.0%	11.1%	11.1%	12.1%	12.0%	12.0%	Return on Com Equity ^D	13.5%		
Dividends 1.5% 2.0% 4.0%				2.3%	1.2%	3.7%	4.3%	4.4%	4.4%	4.4%	4.7%	4.9%	6.1%	6.0%	6.5%	Retained to Com Eq	8.0%		
Book Value 6.5% 5.5% 6.0%				77%	87%	67%	62%	60%	66%	60%	57%	56%	50%	49%	47%	All Div'ds to Net Prof	41%		
QUARTERLY REVENUES (\$ mill.)				BUSINESS: MGE Energy Inc. is a holding company for Madison Gas and Electric, which provides electric service to approximately 141,000 customers in a 316-square-mile area of Dane County and gas service to 147,000 customers in 1,639 square miles in seven counties in Wisconsin. Electric revenue breakdown, '13: residential, 33%; commercial, 52%; industrial, 5%; public authorities and other, 10%. Generating sources, '13: coal, 54%; purchased power, 37%; natural gas and other, 9%. Fuel costs: 21% of revenues. '13 reported depreciation rate: 3.3%. Has 695 employees. Chairman, President & CEO: Gary J. Wolter. Incorporated: Wisconsin. Address: 133 South Blair St., Madison, WI 53788. Telephone: 608-252-7000. Internet: www.mgeenergy.com.															
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year	Shares of MGE Energy have traded higher in recent months. This occurred despite lackluster results in the recent interim. Revenues and share earnings declined modestly for the third quarter, due to cooler-than-normal temperatures. A moderate decrease in electric utility revenues was partly offset by solid growth in gas utility revenues. Operating costs declined somewhat, as well, but so did other income. We look for unimpressive performance for the December quarter, as well. Still, revenues and share earnings will probably advance at a nice pace for full-year 2014, given the strong performance achieved in the first quarter.													
2011	164.6	117.3	133.6	130.9	546.4	We expect a rate case decision shortly. Madison Gas and Electric originally filed an application with the Public Service Commission of Wisconsin in April, requesting a 2.8% increase to electric rates and a 2.3% decrease to gas rates. The company cited costs associated with the construction of emission-reduction equipment and improvements to the state's electric transmission system as reasons for the proposed electric rate increase. Since then, updates have been made to reflect greater													
2012	149.3	117.2	137.8	137.0	541.3	fuel and purchased power costs, lower transmission expense, and higher pension and post-retirement costs. Including the revisions would adjust the electric rate increase requested to 4.3%, and the gas rate decrease sought to 1.4%.													
2013	167.2	128.3	140.1	155.3	590.9	We expect a measure of improvement in 2015. The company's utility operations will probably further gain from favorable demographics. A healthy local economy ought to drive population growth and demand for power in and around Madison, Wisconsin. Efforts to control operating expenses should support the bottom line.													
2014	210.2	128.8	135.1	150.9	625	Conservative accounts may find something to like here. The company has established a track record of stable operating results. Low exposure to economically sensitive industrial customers affords it greater earnings stability. Also, leverage appears quite manageable. Thus, MGE earns high marks for Safety, Financial Strength, Price Stability, and Earnings Predictability. But the dividend yield does not stand out for a utility, and total return potential is nothing to write home about.													
2015	215	135	145	155	650	Moreover, the stock is untimely.													
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year	Michael Napoli, CFA December 19, 2014													
2011	.51	.37	.61	.27	1.76	Company's Financial Strength A													
2012	.46	.41	.68	.31	1.86	Stock's Price Stability 100													
2013	.65	.40	.70	.41	2.16	Price Growth Persistence 65													
2014	.80	.41	.67	.37	2.25	Earnings Predictability 95													
2015	.80	.45	.72	.43	2.40	To subscribe call 1-800-VALUELINE													

(A) Diluted earnings. Next earnings report due late February/early March. (B) Dividends historically paid in mid-March, June, September, and December. (C) Dvd. reinvestment plan available. (D) Rate allowed on common equity in '13: 10.3%; earned on common equity, '13: 12.1%. Regulatory Climate: Above Average. (E) Includes regulatory assets. In 2013: \$113.5 mill., \$3.27 per share.

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NEXTERA ENERGY NYSE-NEE				RECENT PRICE	P/E RATIO 20.2 (Trailing: 24.1 Median: 14.0)										RELATIVE P/E RATIO	DIV'D YLD	2.9%	VALUE LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
TIMELINESS 3 Raised 4/25/14	High: 34.0	38.1	48.1	55.6	72.8	73.8	60.6	56.3	61.2	72.2	89.8	105.9																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
SAFETY 2 Lowered 2/26/10	Low: 26.8	30.1	35.9	37.8	53.7	33.8	41.5	45.3	49.0	58.6	69.8	84.0																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
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<td>351.71</td> <td>365.51</td> <td>368.53</td> <td>372.24</td> <td>394.85</td> <td>405.40</td> <td>407.35</td> <td>408.92</td> <td>413.62</td> <td>420.86</td> <td>416.00</td> <td>424.00</td> <td>435.00</td> <td>443.00</td> <td>458.00</td> </tr> <tr> <td>16.2</td> <td>13.0</td> <td>12.8</td> <td>12.5</td> <td>14.2</td> <td>12.6</td> <td>13.6</td> <td>17.9</td> <td>13.7</td> <td>18.9</td> <td>14.5</td> <td>13.4</td> <td>10.8</td> <td>11.5</td> <td>14.4</td> <td>16.6</td> <td></td> <td></td> </tr> <tr> <td>.84</td> <td>.74</td> <td>.83</td> <td>.64</td> <td>.78</td> <td>.72</td> <td>.72</td> <td>.95</td> <td>.74</td> <td>1.00</td> <td>.87</td> <td>.89</td> <td>.69</td> <td>.72</td> <td>.92</td> <td>.93</td> <td></td> <td></td> </tr> <tr> <td>3.2%</td> <td>3.9%</td> <td>4.1%</td> <td>3.9%</td> <td>4.1%</td> <td>3.9%</td> <td>3.9%</td> <td>3.4%</td> <td>3.4%</td> <td>2.7%</td> <td>3.0%</td> <td>3.5%</td> <td>3.9%</td> <td>4.0%</td> <td>3.6%</td> <td>3.3%</td> <td></td> <td></td> </tr> <tr> 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10 Yrs.</th> <th>Past 5 Yrs.</th> <th>Est'd '11-'13</th> </tr> </thead> <tbody> <tr> <td>3.5%</td> <td>-2.0%</td> <td>1.5%</td> </tr> <tr> <td>6.5%</td> <td>5.5%</td> <td>6.5%</td> </tr> <tr> <td>7.5%</td> <td>6.0%</td> <td>6.0%</td> </tr> <tr> <td>7.5%</td> <td>8.0%</td> <td>8.0%</td> </tr> <tr> <td>8.0%</td> <td>7.5%</td> <td>7.0%</td> </tr> </tbody> </table>														Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'13	3.5%	-2.0%	1.5%	6.5%	5.5%	6.5%	7.5%	6.0%	6.0%	7.5%	8.0%	8.0%	8.0%	7.5%	7.0%	QUARTERLY REVENUES (\$mill.)				<table border="1"> <thead> <tr> <th>Cal-endar</th> <th>Mar.31</th> <th>Jun.30</th> <th>Sep.30</th> <th>Dec.31</th> <th>Full Year</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>3134</td> <td>3961</td> <td>4382</td> <td>3864</td> <td>15341</td> </tr> <tr> <td>2012</td> <td>3371</td> <td>3667</td> <td>3843</td> <td>3375</td> <td>14256</td> </tr> <tr> <td>2013</td> <td>3279</td> <td>3833</td> <td>4394</td> <td>3630</td> <td>15136</td> </tr> <tr> <td>2014</td> <td>3674</td> <td>4029</td> <td>4654</td> <td>3743</td> <td>16100</td> </tr> <tr> <td>2015</td> <td>3650</td> <td>4150</td> <td>4750</td> <td>3850</td> <td>16400</td> </tr> </tbody> </table>														Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year	2011	3134	3961	4382	3864	15341	2012	3371	3667	3843	3375	14256	2013	3279	3833	4394	3630	15136	2014	3674	4029	4654	3743	16100	2015	3650	4150	4750	3850	16400	EARNINGS PER SHARE				<table border="1"> <thead> <tr> <th>Cal-endar</th> <th>Mar.31</th> <th>Jun.30</th> <th>Sep.30</th> <th>Dec.31</th> <th>Full Year</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>.64</td> <td>1.38</td> <td>1.20</td> <td>1.59</td> <td>4.82</td> </tr> <tr> <td>2012</td> <td>1.11</td> <td>1.45</td> <td>.98</td> <td>1.02</td> <td>4.56</td> </tr> <tr> <td>2013</td> <td>1.00</td> <td>1.44</td> <td>1.64</td> <td>.75</td> <td>4.83</td> </tr> <tr> <td>2014</td> <td>.98</td> <td>1.12</td> <td>1.50</td> <td>1.00</td> <td>4.60</td> </tr> <tr> <td>2015</td> <td>1.25</td> <td>1.45</td> <td>1.65</td> <td>1.15</td> <td>5.50</td> </tr> </tbody> </table>														Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year	2011	.64	1.38	1.20	1.59	4.82	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	1.00	4.60	2015	1.25	1.45	1.65	1.15	5.50	QUARTERLY DIVIDENDS PAID				<table border="1"> <thead> <tr> <th>Cal-endar</th> <th>Mar.31</th> <th>Jun.30</th> <th>Sep.30</th> <th>Dec.31</th> <th>Full Year</th> </tr> </thead> <tbody> <tr> <td>2010</td> <td>.50</td> <td>.50</td> <td>.50</td> <td>.50</td> <td>2.00</td> </tr> <tr> <td>2011</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>.55</td> <td>2.20</td> </tr> <tr> <td>2012</td> <td>.60</td> <td>.60</td> <td>.60</td> <td>.60</td> <td>2.40</td> </tr> <tr> <td>2013</td> <td>.66</td> <td>.66</td> <td>.66</td> <td>.66</td> <td>2.64</td> </tr> <tr> <td>2014</td> <td>.725</td> <td>.725</td> <td>.725</td> <td></td> <td></td> </tr> </tbody> </table>														Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year	2010	.50	.50	.50	.50	2.00	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		
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18.43	18.03	20.15	24.10	22.74	26.13	28.27	30.00	38.75	37.47	40.13	37.82	36.39	36.88	33.62	34.80	36.35	35.80																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
5.39	4.86	4.94	5.02	4.51	5.36	5.60	6.18	6.77	6.85	8.03	8.75	9.62	9.29	8.69	10.54	10.55	11.50																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
1.93	2.04	2.07	2.31	2.01	2.45	2.46	2.32	3.23	3.27	4.07	3.97	4.74	4.82	4.56	4.83	4.60	5.50																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
1.00	1.04	1.08	1.12	1.16	1.20	1.30	1.42	1.50	1.64	1.78	1.89	2.00	2.20	2.40	2.64	2.90	3.08																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
1.71	2.41	3.70	3.28	3.44	3.75	3.75	4.09	9.22	12.32	12.80	14.52	13.89	15.93	22.31	15.36	12.75	9.30																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
14.18	15.04	15.91	17.10	17.48	18.91	20.25	21.52	24.49	26.35	28.57	31.35	34.36	35.92	37.90	41.47	44.70	48.35																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
361.42	357.11	351.53	351.71	365.51	368.53	372.24	394.85	405.40	407.35	408.92	413.62	420.86	416.00	424.00	435.00	443.00	458.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																		
16.2	13.0	12.8	12.5	14.2	12.6	13.6	17.9	13.7	18.9	14.5	13.4	10.8	11.5	14.4	16.6																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																				
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(A) Diluted EPS. Excl. nonrecurring gain (losses): '00, (\$4); '02, (60¢); '03, 5¢; '11, (24¢); '13, (80¢); gain on disc. ops.: '13, 44¢. '11 EPS don't add due to rounding. Next earnings report due late Jan. (B) Div'ds historically paid in mid-Mar., mid-June, mid-Sept., & mid-Dec. (C) Div'd reinvestment plan avail. (D) Shareholder investment plan avail. (E) Incl. deferred charges. In '13: \$5.18/sh. (F) In millions, adj. for stock split. (G) 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 A
Stock's Price Stability 100
Price Growth Persistence 70
Earnings Predictability 80

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The earnings decline we estimate for NextEra Energy in 2014 belies the company's solid performance this year. We include mark-to-market accounting credits or charges in our earnings presentation because they are an ongoing part of the company's operations. These reduced profits by \$0.64 a share in the first nine months of 2014, compared with a \$0.04 credit in the same period of 2013. (Over time, these items even out.) Florida Power & Light is benefiting from capital investments that are being recovered in rates and the economic rebound in the utility's service area. NextEra Energy Resources is benefiting from additions to its portfolio of contracted renewable assets. We think a continuation of these trends will boost earnings in 2015. Our estimate is within NextEra's guidance of \$5.40-\$5.70 a share. We don't assume any mark-to-market gains or losses in our estimates because these are impossible to predict. **The initial public offering of NextEra Energy Partners has gone well.** The master limited partnership for some contracted renewable assets has risen more than 40% from the IPO price. However, NextEra incurred \$0.15 a share of spinoff costs in the second quarter. **FPL has a major capital project under way, and other investments are planned.** A plant modernization project is on track for completion in mid-2016 at a cost of \$1 billion. (Two other plant upgrades in recent years were completed ahead of schedule and below budget.) FPL is a one-third partner in a \$3 billion pipeline to transport natural gas to Florida. Federal regulatory approval is needed. The pipeline is expected to be in service by mid-2017. And the utility is asking the Florida regulators for permission to invest in natural gas reserves in order to reduce gas-price volatility to its customers. A ruling is expected by early 2015. **The market is recognizing NextEra's good prospects.** The stock price is up more than 20% so far in 2014. However, even when reflecting a dividend hike we estimate in the first quarter of 2015, the dividend yield is a cut below the utility average. With the recent price near the upper end of our 2017-2019 Target Price Range, total return potential is minuscule. *Paul E. Debbas, CFA November 21, 2014*

OGE ENERGY CORP., NYSE-OGE				RECENT PRICE	35.82	P/E RATIO	18.4	(Trailing: 18.1) (Median: 14.0)	RELATIVE P/E RATIO	0.99	DIV'D YLD	2.9%	VALUE LINE														
TIMELINESS 3	Raised 5/19/14	High: 12.2	13.5	15.3	20.3	20.7	18.1	18.9	23.1	28.6	30.1	40.0	39.3	Target Price Range 2017 2018 2019													
SAFETY 1	Raised 9/19/14	Low: 8.0	11.4	12.2	13.2	14.6	9.8	9.9	16.9	20.3	25.1	27.7	32.9														
TECHNICAL 3	Raised 12/19/14	LEGENDS 0.84 x Dividends p sh divided by Interest Rate Relative Price Strength 2-for-1 split 7/13 Options: Yes Shaded area indicates recession																									
BETA .90	(1.00 = Market)	2017-19 PROJECTIONS Ann'l Total High Price 45 (+2.5%) 9% Low Price 35 (Nil) 3%																									
Insider Decisions J F M A M J J A S to Buy 0 0 0 0 0 0 0 0 0 Options 0 0 0 0 0 0 0 0 0 to Sell 0 1 2 0 2 0 0 2 0																											
Institutional Decisions 1Q2014 2Q2014 3Q2014 to Buy 126 134 147 to Sell 156 141 125 Hld's(000) 115045 116179 117222																											
Percent shares traded 9 6 3																											
% TOT. RETURN 11/14 THIS STOCK VL ARITH. INDEX 1 yr. 6.4 8.0 3 yr. 45.1 72.4 5 yr. 137.7 119.8																											
© VALUE LINE PUB. LLC 17-19																											
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues per sh	14.50								
10.01	13.95	21.17	20.40	19.26	21.62	27.37	32.83	21.96	20.68	21.77	14.79	19.04	19.96	18.58	14.45	12.25	12.70	"Cash Flow" per sh	4.00								
1.95	2.03	2.07	1.81	1.87	1.82	1.87	1.94	2.23	2.39	2.40	2.69	3.01	3.31	3.69	3.46	3.30	3.50	Earnings per sh ^A	2.50								
1.02	.97	.95	.65	.72	.87	.89	.92	1.23	1.32	1.25	1.33	1.50	1.73	1.79	1.94	1.95	2.10	Div'd Decl'd per sh ^B	1.40								
.67	.67	.67	.67	.67	.67	.67	.67	.67	.68	.70	.71	.73	.76	.80	.85	.95	1.05	Cap'l Spending per sh	3.75								
.93	1.16	1.15	1.44	1.49	1.04	1.51	1.65	2.67	3.04	4.01	4.37	4.36	6.48	5.85	4.99	3.05	2.65	Book Value per sh ^C	20.50								
6.46	6.55	6.83	6.67	6.27	6.87	7.14	7.59	8.79	9.16	10.14	10.52	11.73	13.06	14.00	15.30	16.25	17.30	Common Shs Outstg' ^D	204.00								
161.60	155.73	155.84	155.98	157.00	174.80	180.00	181.20	182.40	183.60	187.00	194.00	195.20	196.20	197.60	198.50	200.00	201.00	Avg Ann'l P/E Ratio	16.5								
13.3	12.1	10.6	17.4	14.1	11.8	14.1	14.9	13.7	13.8	12.4	10.8	13.3	14.4	15.2	17.7	Bold figures are Value Line estimates	200.00	201.00	Relative P/E Ratio	1.05							
.69	.69	.69	.89	.77	.67	.74	.79	.74	.73	.75	.72	.85	.90	.97	1.00	2.5%	2.5%	Avg Ann'l Div'd Yield	3.4%								
4.9%	5.7%	6.6%	5.9%	6.6%	6.5%	5.3%	4.9%	4.0%	3.3%	4.5%	5.0%	3.7%	3.1%	2.9%	2.5%												
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$2921.1 mill. Due in 5 Yrs \$1247.0 mill. LT Debt \$2509.7 mill. LT Interest \$145.3 mill. (LT Interest earned: 4.8x)														4926.6	5948.2	4005.6	3797.6	4070.7	2869.7	3716.9	3915.9	3671.2	2867.7	2450	2550	Revenues (\$mill)	2950
Leases, Uncapitalized Annual rentals \$6.7 mill.														157.8	166.1	226.1	244.2	231.4	258.3	295.3	342.9	355.0	387.6	390	420	Net Profit (\$mill)	510
Pension Assets-12/13 \$654.9 mill. Oblig. \$658.1 mill.														34.5%	30.2%	34.8%	32.3%	30.4%	31.7%	34.9%	30.7%	26.0%	24.9%	32.5%	32.5%	Income Tax Rate	32.5%
Pfd Stock None														1.1%	1.3%	3.8%	1.6%	1.7%	9.1%	5.7%	9.0%	2.7%	2.6%	4.0%	2.0%	AFUDC % to Net Profit	2.0%
Common Stock 199,319,096 shs.														52.6%	49.5%	45.6%	44.4%	53.3%	50.6%	50.8%	51.6%	50.7%	43.1%	46.0%	44.0%	Long-Term Debt Ratio	45.5%
MARKET CAP: \$7.1 billion (Large Cap)														47.4%	50.5%	54.4%	55.6%	46.7%	49.4%	49.2%	48.4%	49.3%	56.9%	54.0%	56.0%	Common Equity Ratio	54.5%
ELECTRIC OPERATING STATISTICS														2709.7	2726.6	2950.1	3026.5	4058.6	4129.7	4652.5	5300.4	5615.8	5337.2	6010	6240	Total Capital (\$mill)	7700
Fixed Charge Cov. (%)														3581.0	3567.4	3867.5	4246.3	5249.8	5911.6	6464.4	7474.0	8344.8	6672.8	7005	7250	Net Plant (\$mill)	8275
ANNUAL RATES														7.4%	7.6%	9.1%	9.5%	7.0%	7.9%	7.8%	7.8%	7.7%	8.6%	7.5%	8.0%	Return on Total Cap'l	8.0%
of change (per sh)														12.3%	12.1%	14.1%	14.5%	12.2%	12.7%	12.9%	13.4%	12.8%	12.8%	12.0%	12.0%	Return on Shr. Equity	12.0%
Revenues														12.3%	12.1%	14.1%	14.5%	12.2%	12.7%	12.9%	13.4%	12.8%	12.8%	12.0%	12.0%	Return on Com Eq	12.0%
"Cash Flow"														3.4%	3.4%	6.6%	7.1%	5.4%	6.0%	6.7%	7.7%	7.2%	7.3%	6.0%	6.0%	Retained to Com Eq	5.5%
Earnings														73%	72%	53%	51%	55%	53%	48%	43%	44%	43%	49%	50%	All Div'ds to Net Prof	56%
Dividends																											
Book Value																											
QUARTERLY REVENUES (\$ mill.)																											
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year																						
2011	840.5	978.1	1212.1	885.2	3915.9																						
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	523.1	2450																						
2015	575	625	800	550	2550																						
EARNINGS PER SHARE ^A																											
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year																						
2011	.13	.52	.90	.18	1.73																						
2012	.19	.47	.94	.19	1.79																						
2013	.12	.46	1.08	.29	1.94																						
2014	.25	.50	.94	.26	1.95																						
2015	.20	.55	1.15	.20	2.10																						
QUARTERLY DIVIDENDS PAID ^B																											
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year																						
2010	.18125	.18125	.18125	.18125	.73																						
2011	.1875	.1875	.1875	.1875	.75																						
2012	.19625	.19625	.19625	.19625	.79																						
2013	.20875	.20875	.20875	.20875	.84																						
2014	.225	.225	.225	.25																							

BUSINESS: OGE Energy Corp. is a holding company for Oklahoma Gas and Electric Company (OG&E), which supplies electricity to 813,000 customers in Oklahoma (88% of electric revenues) and western Arkansas (9%); wholesale is (3%). Owns 26.3% of Enable Midstream Partners. Acquired Transok 6/99. Electric revenue breakdown: residential, 42%; commercial, 26%; industrial, 19%;

other, 13%. Generating sources: coal, 42%; gas, 32%; wind, 5%; purchased, 21%. Fuel costs: 50% of revenues. '13 reported depreciation rate (utility): 2.8%. Has 2,400 employees. Chairman & CEO: Peter B. Delaney. President: Sean Trauschke. Inc.: Oklahoma. Address: 321 North Harvey, P.O. Box 321, Oklahoma City, Oklahoma 73101-0321. Tel.: 405-553-3000. Internet: www.oge.com.

OGE Energy's utility subsidiary is awaiting a ruling from the Oklahoma Corporation Commission on its environmental compliance plan. This plan calls for Oklahoma Gas and Electric to spend \$1.1 billion through 2019 to comply with mandates by the U.S. Environmental Protection Agency. OG&E appealed EPA's order, but lost. The utility wants to recover these costs through a rider on customers' bills until they are reflected in base rates. The schedule calls for a decision in March of 2015. Soon thereafter—probably in the second quarter—OG&E will file a general rate case in Oklahoma, with an order due six months later. The utility also plans to file an application in Arkansas in 2015.

Earnings will likely make little (if any) progress in 2014, but we expect improvement in 2015. In most respects, things are going well for OGE. The service area's economy is strong, although it remains to be seen whether the recent drop in oil prices will have a noticeable effect. The formation of Enable Midstream Partners in 2013 and the initial public offering of Enable earlier this year have benefited

the company. However, due to mild summer weather, we trimmed our share-earnings estimate by a nickel, to \$1.95. That's near the low end of the company's guidance of \$1.94-\$2.06. We assume normal weather in our 2015 forecast.

The board of directors raised the dividend significantly. In late September, the directors raised the quarterly disbursement by \$0.025 a share (11.1%). OGE also stated a goal of raising the dividend 10% annually through 2019. Rising distributions from Enable should enable the board to meet this goal. In the first nine months of 2014, these distributions amounted to \$110.1 million.

OGE's share price has risen only 6% year to date. This makes the top-quality stock an outlier in a year in which many utility issues have soared more than 20%. Investors' worries (excessive, in our view) about the effects of lower oil prices on Enable is most probably responsible for the underperformance. The dividend yield is still on the low side for a utility, but 3- to 5-year total return prospects are better than those of most utility equities.

Paul E. Debbas, CFA December 19, 2014

(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 late Feb. (B) Div'ds historically paid in late Jan., Apr., July, & Oct. (C) Div'd reinvestment plan available. (D) Incl. deferred charges. In '13: \$1.91/sh. (E) In millions, adj. for split.

(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. eq., '13: 13.2%. Regulatory Climate: Average.

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

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OTTER TAIL CORP. NDQ:OTTR

RECENT PRICE **29.90** P/E RATIO **17.0** (Trailing: 18.2 Median: 23.0) RELATIVE P/E RATIO **0.92** DIV'D YLD **4.1%** VALUE LINE

TIMELINESS 3 Lowered 12/12/14	High: 28.9 27.5 32.0 31.9 39.4 46.2 25.4 25.4 23.5 25.3 31.9 31.7	Low: 23.8 23.8 24.0 25.8 29.0 15.0 15.5 18.2 17.5 20.7 25.2 26.5	Target Price Range 2017 2018 2019 64 48 40 32 24 20 16 12 8 6
SAFETY 3 Lowered 12/24/10	LEGENDS --- 100 x Dividends p sh divided by Interest Rate ... Relative Price Strength Options: Yes Shaded area indicates recession		
TECHNICAL 4 Lowered 12/19/14	2017-19 PROJECTIONS Ann'l Total Price Gain Return High 40 (+35%) 11% Low 30 (Nil) 4%		
BETA 90 (1.00 = Market)	Insider Decisions J F M A M J J A S to Buy 0 0 0 0 0 0 0 0 0 Options 0 0 1 0 0 0 0 0 0 to Sell 0 2 0 0 0 0 0 0 0		
Institutional Decisions		% TOT. RETURN 11/14	
1Q2014 2Q2014 3Q2014		THIS STOCK VL ARITH. INDEX	
to Buy 59 51 48		1 yr. 1.5 8.0	
to Sell 39 55 52		3 yr. 52.0 72.4	
Hld's(000) 12156 12279 12308		5 yr. 60.2 119.8	

1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC 17-19	
18.14	19.48	23.45	26.53	27.75	29.28	30.45	35.59	37.43	41.50	37.06	29.03	31.08	29.86	23.76	24.63	25.95	26.30	Revenues per sh	32.50
2.75	2.91	3.21	3.40	3.44	3.30	2.88	3.35	3.39	3.55	2.81	2.76	2.60	2.36	2.71	3.03	3.40	3.70	"Cash Flow" per sh	4.75
1.29	1.45	1.60	1.68	1.79	1.51	1.50	1.78	1.69	1.78	1.09	.71	.38	.45	1.05	1.37	1.75	1.85	Earnings per sh ^A	2.30
.96	.99	1.02	1.04	1.06	1.08	1.10	1.12	1.15	1.17	1.19	1.19	1.19	1.19	1.19	1.19	1.21	1.23	Div'd Decl'd per sh ^B	1.30
1.23	1.37	1.85	2.17	2.95	1.97	1.72	2.04	2.35	5.43	7.51	4.95	2.38	2.04	3.20	4.53	4.45	4.45	Cap'l Spending per sh	4.75
9.47	10.30	10.87	11.33	12.25	12.98	14.81	15.80	16.67	17.55	19.14	18.78	17.57	15.83	14.43	14.74	15.55	16.05	Book Value per sh ^C	18.15
23.76	23.85	23.85	24.65	25.59	25.72	28.98	29.40	29.52	29.85	35.38	35.81	36.00	36.10	36.17	36.27	37.00	38.00	Common Shs Outst'g ^D	40.00
14.4	13.9	13.5	16.4	16.0	17.8	17.3	15.4	17.3	19.0	30.1	31.2	55.1	47.5	21.7	21.1	Bold figures are Value Line estimates		Avg Ann'l P/E Ratio	15.0
.75	.79	.88	.84	.87	1.01	.91	.82	.93	1.01	1.81	2.08	3.51	2.98	1.38	1.19			Relative P/E Ratio	.95
5.2%	4.9%	4.7%	3.8%	3.7%	4.0%	4.2%	4.1%	3.9%	3.5%	3.6%	5.4%	5.7%	5.6%	5.2%	4.1%			Avg Ann'l Div'd Yield	3.8%

CAPITAL STRUCTURE as of 9/30/14		2011	2012	2013	Leases, Uncapitalized Annual rentals \$8 mill.		Pension Assets-12/13 \$213.6 mill. Oblig. \$254.0 mill.		Pfd Stock None		Common Stock 36,806,160 shs. as of 10/31/14		MARKET CAP: \$1.1 billion (Mid Cap)	
Total Debt \$537.7 mill. Due in 5 Yrs \$114.3 mill.	LT Debt \$498.5 mill. LT Interest \$27.0 mill. (LT interest earned: 3.7x)	882.3	1046.4	1105.0	37.1%	35.0%	60.7%	706.5	682.1	6.8%	9.0%	9.1%	2.5%	73%
		40.0	52.9	50.8	35.0%	33.5%	62.9%	738.2	697.1	8.3%	11.0%	11.2%	4.2%	63%
		50.8	54.0	54.0	38.9%	32.9%	59.4%	882.1	854.0	7.7%	10.0%	10.2%	3.3%	68%
		54.0	54.0	54.0	32.9%	38.8%	65.6%	1032.5	1037.6	4.3%	5.1%	5.1%	3.5%	108%
		54.0	54.0	54.0	40.2%	44.6%	58.4%	1124.4	1098.6	3.4%	3.8%	3.8%	NMF	NMF
		54.0	54.0	54.0	44.0%	42.1%	54.4%	1083.3	1108.7	2.7%	2.1%	2.0%	NMF	NMF
		54.0	54.0	54.0	42.1%	47.5%	57.9%	959.2	1049.5	5.7%	7.3%	7.3%	NMF	113%
		54.0	54.0	54.0	47.5%	48.5%	52.5%	924.4	1167.0	6.6%	9.4%	9.4%	1.2%	87%
		54.0	54.0	54.0	48.5%	51.5%	51.5%	1100	1350	7.0%	11.5%	11.5%	3.5%	70%
		54.0	54.0	54.0	51.0%	51.0%	51.0%	1185	1350	7.0%	11.5%	11.5%	3.5%	68%
		54.0	54.0	54.0	49.0%	49.0%	49.0%	1425	1600	7.5%	12.5%	12.5%	5.0%	59%
		54.0	54.0	54.0	51.0%	51.0%	51.0%	1425	1600	7.5%	12.5%	12.5%	5.0%	59%
		54.0	54.0	54.0	51.0%	51.0%	51.0%	1425	1600	7.5%	12.5%	12.5%	5.0%	59%

BUSINESS: Otter Tail Corporation is the parent of Otter Tail Power Company, which supplies electricity to over 130,000 customers in Minnesota (48% of retail elec. revs.), North Dakota (43%), and South Dakota (9%). Electric rev. breakdown, '13: residential, 33%; commercial & farms, 37%; industrial, 23%; other, 7%. Fuel costs: 13.8% of revenues. Also has operations in manufacturing, construction, and plastics. 2013 depr. rate: 3.2%. Has 2,336 employees. Off. and dir. own 1.4% of common stock: Cascade Investment, LLC, 9.5%; Vanguard Group, Inc., 6.5%; BlackRock, Inc., 5.7% (2/14 Proxy). CEO: Edward McIntyre, Inc. MN. Address: 215 South Cascade St., P.O. Box 496, Fergus Falls, Minnesota 56538-0496. Telephone: 866-410-8780. Internet: www.ottertail.com.

ANNUAL RATES		Past 10 Yrs.	Past 5 Yrs.	Est'd '11-'13
change (per sh)				
Revenues	1.0%	-6.0%	3.5%	
"Cash Flow"	-2.5%	-5.5%	10.0%	
Earnings	-9.5%	-18.5%	15.5%	
Dividends	1.5%	.5%	1.5%	
Book Value	3.5%	-1.0%	3.0%	

Cal-endar	QUARTERLY REVENUES (\$ mill)				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2011	249.1	283.3	282.4	263.1	1077.9
2012	219.9	211.4	215.3	212.6	859.2
2013	218.0	212.4	229.8	233.1	893.3
2014	240.5	234.6	242.4	242.5	960
2015	248	242	255	255	1000

Cal-endar	EARNINGS PER SHARE ^A				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2011	.14	.14	.20	d.03	.45
2012	.28	.19	.13	.47	1.05
2013	.41	.21	.41	.35	1.37
2014	.59	.27	.43	.46	1.75
2015	.55	.32	.50	.48	1.85

Cal-endar	QUARTERLY DIVIDENDS PAID ^B				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2010	.298	.298	.298	.298	1.19
2011	.298	.298	.298	.298	1.19
2012	.298	.298	.298	.298	1.19
2013	.298	.298	.298	.298	1.19
2014	.303	.303	.303	.303	1.19

Shares of Otter Tail have traded somewhat higher over the past three months. The company reported solid performance for the third quarter. The electric line benefited from higher net cost recovery rider revenue, an increase in fuel clause adjustment revenue, and greater sales to pipeline customers. This was partly offset by the impact of milder weather and lower wholesale electric revenue. Meanwhile, the Manufacturing unit's BTD subsidiary reported higher sales to customers in recreational, lawn and garden, and energy-related end markets. Elsewhere, the Plastics line benefited from an increase in demand for polyvinyl chloride (PVC) pipe. The top line declined in the Construction segment, though earnings improved on higher margins. Overall, revenues and share earnings advanced moderately, on a year-over-year basis. We expect favorable comparisons for the fourth quarter, and healthy growth for the company for full-year 2014. **Revenues and earnings will probably continue to advance from 2015 onward.** The Electric segment should be able to further capitalize on a healthy operating climate in the coming quarters. This line will likely continue to experience growth in retail kilowatt-hour sales and rider recovery revenue going forward. Meanwhile, good performance ought to continue at the Manufacturing unit's BTD operation, though this will likely be partly offset by less favorable results at subsidiary T.O. Plastics. Elsewhere, the Construction business ought to gain from demand for electric transmission and distribution work, more-selective bidding on projects, and improved cost control processes. In addition, the Plastics segment should further benefit from healthy customer demand for PVC pipe. However, earnings here could well remain soft, as greater resin costs may not be fully recovered through increased pipe prices. **This stock is ranked to track the broader equity market for the coming six to 12 months.** Looking further out, this issue is not a standout for long-term appreciation potential, from the recent quotation. Nevertheless, income-oriented investors may find the healthy dividend yield attractive.

Michael Napoli, CFA December 19, 2014

(A) Diluted earnings. Excl. nonrecurring gains (losses): '98, 7¢; '99, 34¢; '10, (44¢); '11, 26¢; '13, 2¢; gains (losses) from discount operations: '04, 8¢; '05, 33¢; '06, 1¢; '11, (\$1.11); '12, (\$1.22). Earnings may not sum due to rounding. Next earnings report due in February. (B) Div'ds historically paid in early March, June, Sept., and Dec. ■ Div'd reinvestment plan avail. (C) Incl. intangibles. In '13: \$52.3 mill., \$1.44/sh. (D) In mill. (E) Regulatory Climate: MN, ND, Average; SD, Above Average. Company's Financial Strength B+ Stock's Price Stability 85 Price Growth Persistence 20 Earnings Predictability 50

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PEPCO HOLDINGS NYSE-PCM		RECENT PRICE	P/E RATIO 20.5 (Trailing: 21.5 Median: 15.0)										RELATIVE P/E RATIO	DIV'D YLD	3.9%	VALUE LINE
TIMELINESS — Suspended 5/9/14 SAFETY 3 Lowered 6/6/03 TECHNICAL — Suspended 5/9/14 BETA .70 (1.00 = Market)		High: 20.6 Low: 16.1	21.7 16.9	24.5 20.3	27.0 21.8	30.7 24.2	29.6 15.3	18.7 10.1	19.8 15.1	20.6 16.6	20.5 18.1	22.7 18.0	27.9 18.5	Target Price Range 2017 2018 2019		
2017-19 PROJECTIONS Price Gain Ann'l Total High 30 (+10%) 5% Low 20 (-25%) -3%												% TOT. RETURN 10/14 THIS STOCK VL ARITH. INDEX 1 yr. 48.7 10.1 3 yr. 61.7 67.5 5 yr. 142.0 124.6				
Insider Decisions D J F M A M J J A to Buy 0 0 0 0 0 0 0 0 to Sell 0 0 0 0 0 0 0 0 Institutional Decisions 4Q2013 1Q2014 2Q2014 to Buy 167 155 160 to Sell 138 157 176 Hld's(000) 144455 148709 153156		Percent 30 shares 20 traded 10														
Peppo Holdings, Inc. (PHI) was formed on August 1, 2002, upon the merger of Potomac Electric Power Co. (PEPCO) and Connecticut. In the \$2.2 billion deal, PEPCO common stockholders received one common share in PHI for each of their shares, and Conectiv investors exchanged each of their common shares for \$25 worth of PHI stock and cash, prorated 50/50.		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC 17-19		
		38.35	42.49	43.57	46.71	48.88	41.66	31.27	26.02	22.09	18.64	19.85	21.25	Revenues per sh	25.40	
		3.71	3.67	3.47	3.30	3.55	2.82	2.97	3.00	3.21	3.01	3.25	3.45	"Cash Flow" per sh	3.75	
		1.46	1.49	1.33	1.53	1.93	1.06	1.24	1.14	1.24	1.14	1.25	1.45	Earnings per sh A	1.75	
		1.00	1.00	1.04	1.04	1.08	1.08	1.08	1.08	1.08	1.08	1.08	1.08	Div'd Decl'd per sh B	1.08	
		2.75	2.46	2.47	3.11	3.57	3.89	3.56	4.14	5.29	5.23	5.20	5.20	Cap'l Spending per sh	4.00	
		17.87	18.88	18.82	20.04	19.14	19.15	18.79	19.06	19.33	17.24	19.45	20.10	Book Value per sh C	21.90	
		188.33	189.82	191.93	200.51	218.91	222.27	225.08	227.50	230.02	250.32	252.00	254.00	Common Shs Outst'g D	260.00	
		13.6	14.9	18.1	18.2	12.2	13.7	14.0	16.7	15.6	17.5	17.5	17.5	Avg Ann'l P/E Ratio	14.0	
		.72	.79	.98	.97	.73	.91	.89	1.05	.99	.98	.98	.98	Relative P/E Ratio	.90	
		5.0%	4.5%	4.3%	3.7%	4.6%	7.4%	6.2%	5.7%	5.6%	5.4%	5.4%	5.4%	Avg Ann'l Div'd Yield	4.9%	
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$5750 mill. Due in 5 Yrs \$1612 mill. LT Debt \$4691 mill. LT Interest \$260 mill. (LT interest earned: 3.7x)		7221.8	8065.5	8362.9	9366.4	10700	9259.0	7039.0	5920.0	5081.0	4666.0	5000	5400	Revenues (\$mill)	6600	
		261.3	277.4	254.4	296.5	400.0	235.0	276.0	257.0	285.0	280.0	315	370	Net Profit (\$mill)	455	
		38.7%	38.8%	39.1%	39.3%	29.6%	31.9%	18.8%	37.2%	35.4%	35.3%	35.0%	35.0%	Income Tax Rate	35.0%	
		--	--	--	--	--	--	--	7.4%	6.4%	6.0%	5.0%	AFUDC % to Net Profit	4.0%		
Pension Assets -12/13 \$2.0 bill. Oblig. \$2.2 bill.		59.7%	57.1%	54.6%	54.1%	56.2%	53.8%	49.0%	49.1%	47.3%	48.4%	47.5%	47.5%	Long-Term Debt Ratio	49.5%	
Pfd Stock None		39.6%	42.3%	45.1%	45.9%	43.8%	46.2%	51.0%	50.9%	52.7%	51.6%	52.5%	52.5%	Common Equity Ratio	50.5%	
		8494.0	8469.3	8004.0	8753.0	9568.0	9203.0	8292.0	8516.0	8432.0	8668.0	9300	9700	Total Capital (\$mill)	11500	
		7088.0	7312.0	7576.6	7876.7	8314.0	8863.0	7673.0	8220.0	8846.0	9704.0	10000	10500	Net Plant (\$mill)	12000	
Common Stock 251,907,108 shs. as of 10/20/14		5.0%	5.0%	5.1%	5.1%	5.8%	4.5%	5.1%	4.5%	4.9%	4.9%	4.5%	5.0%	Return on Total Cap'l	5.5%	
		7.6%	7.6%	7.0%	7.4%	9.5%	5.5%	6.5%	5.9%	6.4%	6.5%	6.5%	7.5%	Return on Shr. Equity	8.0%	
		7.7%	7.7%	7.0%	7.4%	9.5%	5.5%	6.5%	5.9%	6.4%	6.5%	6.5%	7.5%	Return on Com Eq	8.0%	
MARKET CAP: \$6.9 billion (Large Cap)		2.5%	2.4%	1.5%	2.3%	NMF	.8%	.3%	.8%	.8%	.2%	.5%	1.5%	Retained to Com Eq	2.5%	
		68%	69%	78%	68%	56%	101%	87%	95%	87%	96%	90%	77%	All Div'ds to Net Prof	69%	
ELECTRIC OPERATING STATISTICS		2011 2012 2013														
% Change Retail Sales (KWH)		-2.8	NA	NA												
Avg. Resid'l Use (KWH)		10836	10451	10405												
Avg. Resid'l Revs. per KWH(g)		NA	NA	NA												
Capacity at Peak (Mw)		NA	NA	NA												
Peak Load, Summer (Mw)		NA	NA	NA												
Annual Load Factor (%)		NA	NA	NA												
% Change Customers (yr-end)		+7	+3	+6												
Fixed Charge Cov. (%)		251	253	246												
ANNUAL RATES Past Past Est'd '11-'13 of change (per sh) 10 Yrs. 5 Yrs. to '17-'19																
Revenues		-6.5%	-13.5%	2.0%												
"Cash Flow"		-2.5%	-2.0%	3.5%												
Earnings		-4.0%	-6.0%	7.0%												
Dividends		8.5%	.5%	0.0%												
Book Value		.5%	-1.0%	3.0%												
QUARTERLY REVENUES (\$mill.)		Full Year														
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	2011	2012	2013	2014	2015							
	1634	1409	1643	1234	5920.0	5081.0	4666.0	5000	5400							
	1292	1179	1476	1134	5081.0	5081.0	4666.0	5000	5400							
	1178	1053	1344	1091	4666.0	4666.0	5000	5000	5400							
	1330	1117	1313	1240	5000	5000	5000	5000	5000							
	1350	1200	1500	1350	5400	5400	5400	5400	5400							
EARNINGS PER SHARE AF		Full Year														
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	2011	2012	2013	2014	2015							
	.28	.42	.35	.09	1.14	1.24	1.14	1.25	1.45							
	.30	.27	.49	.18	1.24	1.24	1.14	1.25	1.45							
	.24	.22	.44	.24	1.14	1.24	1.14	1.25	1.45							
	.30	.21	.44	.30	1.25	1.24	1.14	1.25	1.45							
	.30	.30	.55	.30	1.45	1.24	1.14	1.25	1.45							
QUARTERLY DIVIDENDS PAID B		Full Year														
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	2010	2011	2012	2013	2014							
	.27	.27	.27	.27	1.08	1.08	1.08	1.08	1.08							
	.27	.27	.27	.27	1.08	1.08	1.08	1.08	1.08							
	.27	.27	.27	.27	1.08	1.08	1.08	1.08	1.08							
	.27	.27	.27	.27	1.08	1.08	1.08	1.08	1.08							

(A) Based on dil. shs. Excl. nonrecr. items: '03, d69¢; '04, 1¢; '05, 47¢; '06, d1¢; '08, 46¢; '10, 62¢; '13, 69¢. Next egs. rpt. due late Feb. (B) Div'ds paid in early March, June, Sep., and Dec. ■ Div'd reinvest. plan. (C) Incl. def'd chgs: '12, \$4.8 bill; or \$20.87/sh. (D) In mill. (E) Rate allowed in MD: 9.36% ('13-Peppo), 10.0% ('09-Delmarva); DC: 9.6% ('10-Pepp); DEL: 10.0% ('06-Del.); NJ: 9.75% ('13-ACE); Earned on '13 avg. com. eq., 6.5%. Reg. Clim.: Avg. (F) Qtrly egs. may not add due to chng. in shs.

Company's Financial Strength B+
 Stock's Price Stability 95
 Price Growth Persistence 15
 Earnings Predictability 70

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PG&E CORP. NYSE:PCG		RECENT PRICE	PIE RATIO 16.9 (Trailing: 19.7 Median: 15.0)										RELATIVE PIE RATIO	DIV'D YLD	3.1%	VALUE LINE			
TIMELINESS	3 Lowered 12/19/14	High: 28.0	34.5	40.1	48.2	52.2	45.7	45.8	48.6	48.0	47.0	48.5	55.2				Target Price Range		
SAFETY	3 Lowered 2/3/12	Low: 11.7	25.9	31.8	36.3	42.6	26.7	34.5	34.9	36.8	39.4	39.9	39.4				2017		
TECHNICAL	3 Raised 11/28/14	LEGENDS — 0.93 x Dividends p sh divided by Interest Rate ... Relative Price Strength Options: Yes Shaded area indicates recession															2018		
BETA	.65 (1.00 = Market)	2019																	
2017-19 PROJECTIONS																			
	Price	Gain	Ann'l Total Return																
High	55	(-5%)	2%																
Low	40	(-30%)	-4%																
Insider Decisions																			
	F	M	A	M	J	J	A	S	O										
to Buy	0	0	0	0	0	0	0	0	0										
Options	0	0	0	0	0	0	1	0	0										
to Sell	0	6	0	1	0	0	0	0	0										
Institutional Decisions																			
	1Q2014	2Q2014	3Q2014																
to Buy	217	206	210																
to Sell	203	205	186																
Hld's(000)	370504	387652	390623																
	Percent	12																	
	shares	8																	
	traded	4																	
			2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB, LLC	17-19	
52.12	57.74	67.75	63.18	32.74	25.05	26.47	31.78	36.02	37.42	40.51	36.15	35.02	36.28	34.92	34.16	35.50	35.90	Revenues per sh	41.00
6.08	7.15	.80	5.66	1.14	4.80	5.71	7.12	7.76	8.02	8.44	8.37	8.22	8.08	7.32	6.33	7.95	7.95	"Cash Flow" per sh	9.25
1.88	2.24	d9.21	3.02	d2.36	2.05	2.12	2.35	2.76	2.78	3.22	3.03	2.82	2.78	2.07	1.83	3.15	2.95	Earnings per sh ^A	3.50
1.20	1.20	1.20	--	--	--	--	1.23	1.32	1.44	1.56	1.68	1.82	1.82	1.82	1.82	1.82	1.82	Div'd Decl'd per sh ^B †	2.10
4.23	4.39	4.54	7.33	7.94	4.08	3.72	4.90	6.90	7.83	10.05	10.68	9.62	9.79	10.74	11.40	10.70	11.35	Cap'l Spending per sh	11.25
21.08	19.10	8.19	11.89	9.47	10.12	20.62	19.60	22.44	24.18	25.97	27.88	28.55	29.35	30.35	31.41	33.25	34.60	Book Value per sh ^C	39.25
382.60	360.59	387.19	363.38	381.67	416.52	418.62	368.27	348.14	353.72	361.06	370.60	395.23	412.26	430.72	456.67	476.00	485.00	Common Shs Outst'g ^D	500.00
16.8	13.1	--	4.8	--	9.5	13.8	15.4	14.8	16.8	12.1	13.0	15.8	15.5	20.7	23.7	14.6		Avg Ann'l PIE Ratio	13.5
.87	.75	--	.25	--	.54	.73	.82	.80	.89	.73	.87	1.01	.97	1.32	1.33	.75		Relative P/E Ratio	.85
3.8%	4.1%	4.8%	--	--	--	--	3.4%	3.2%	3.1%	4.0%	4.3%	4.1%	4.2%	4.2%	4.0%			Avg Ann'l Div'd Yield	4.4%
CAPITAL STRUCTURE as of 9/30/14																			
Total Debt \$14981 mill. Due in 5 yrs \$2849 mill.																			
LT Debt \$14555 mill. LT Interest \$720 mill.																			
Incl. \$90 mill. capitalized leases.																			
(LT interest earned: 3.4x)																			
Pension Assets-12/13 \$12527 mill.																			
Pfd Stock \$252 mill. Pfd Div'd \$14 mill.																			
4,534,958 shs. 4.36% to 5%, cumulative and \$25 par, redeemable from \$25.75 to \$27.25; 5,784,825 shs. 5.00% to 6.00%, cumulative nonredeemable and \$25 par.																			
Common Stock 475,088,027 shs. as of 10/20/14																			
MARKET CAP: \$28 billion (Large Cap)																			
ELECTRIC OPERATING STATISTICS																			
2011			2012		2013														
% Change Retail Sales (KWH)			+3		+6.0		+5												
Avg. Indust. Use (MWH)			N/A		N/A		N/A												
Avg. Indust. Revs. per KWH (¢)			9.51		9.17		9.28												
Capacity at Peak (Mw)			N/M F		N/M F		N/M F												
Peak Load, Summer (Mw)			N/M F		N/M F		N/M F												
Annual Load Factor (%)			N/M F		N/M F		N/M F												
% Change Customers (yr-end)			+4		+5		+3												
Fixed Charge Cov. (%)			295		231		223												
ANNUAL RATES			Past		Past		Est'd '11-'13												
of change (per sh)			10 Yrs.		5 Yrs.		'17-'19												
Revenues			-1.5%		-1.5%		2.5%												
"Cash Flow"			6.5%		-2.0%		4.0%												
Earnings			9.5%		-5.5%		8.0%												
Dividends			--		5.0%		2.5%												
Book Value			11.0%		4.5%		4.5%												
QUARTERLY REVENUES (\$ mill.)			Full Year																
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31															
2011	3597	3684	3860	3815	14956														
2012	3641	3593	3976	3830	15040														
2013	3672	3776	4175	3975	15598														
2014	3891	3952	4939	4118	16900														
2015	4150	4150	4850	4250	17400														
EARNINGS PER SHARE ^A			Full Year																
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31															
2011	.50	.91	.68	.69	2.78														
2012	.66	.55	.87	d.01	2.07														
2013	.55	.74	.36	.19	1.83														
2014	.49	.57	1.71	.38	3.15														
2015	.65	.70	1.05	.55	2.95														
QUARTERLY DIVIDENDS PAID ^B †			Full Year																
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31															
2011	.455	.455	.455	.455	1.82														
2012	.455	.455	.455	.455	1.82														
2013	.455	.455	.455	.455	1.82														
2014	.455	.455	.455	.455	1.82														
2015	.455	.455	.455	.455	1.82														
BUSINESS: PG&E Corporation is a holding company for Pacific Gas and Electric Company and nonutility subsidiaries. Supplies electricity and gas to most of northern and central California. Has 5.3 million electric and 4.4 million gas customers. Electric revenue breakdown: residential, 41%; commercial, 39%; industrial, 11%; agricultural, 8%; other, 1%. Generating sources: nuclear, 24%; hydro, 11%; gas, 8%; purchased, 57%. Fuel costs: 38% of revenues. '13 reported depreciation rate (utility): 3.5%. Has 21,200 employees. Chairman, President & Chief Executive Officer: Anthony F. Earley, Jr. Incorporated: California. Address: One Market, Spear Tower, Suite 2400, San Francisco, California 94105. Telephone: 415-267-7000. Internet: www.pgecorp.com.																			
<p>Will 2015 be the year in which the uncertainties surrounding the explosion of a PG&E gas pipeline in San Bruno, California are finally resolved? In September of 2010, the accident killed eight people, injured dozens more, and caused extensive property damage. Since then, the company has incurred (and continues to do so) significant pipeline-related expenses that were not recovered from customers. These costs are included in our earnings presentation, but a \$200 million reserve PG&E took for a probable fine was excluded. All told, the company has incurred (or committed to do so) \$2.7 billion in unrecovered costs. However, administrative law judges and the Safety and Enforcement Division of the California Public Utilities Commission (CPUC) are each recommending additional penalties that would raise the negative pretax impact on shareholders to more than \$4.7 billion. The company is also facing an indictment from the federal government.</p> <p>Earnings are tough to predict. This is due to uncertainties in the magnitude and timing of the unrecovered costs, as well as any insurance recoveries. (Note that our</p>																			
<p>Earnings Predictability score includes data from years before the accident.) Wall Street appears optimistic that this problem will be resolved without excessive harm to the company's finances. The share price rose more than 25% in 2014, and has advanced almost 10% so far in the new year. PG&E awaits a ruling on its gas transmission and storage case. The utility requested increases of \$555 million in 2015, \$61 million in 2016, and \$168 million in 2017. New rates will be retroactive to the start of this year. However, the discovery of some <i>ex parte</i> communications (via e-mail) between the company and the CPUC might well complicate this matter. We believe more-attractive selections are available elsewhere. Following the run-up in the stock price, the dividend yield is a bit below average for a utility. The payout hasn't been raised since the accident, and we expect no hike again in 2015, even if the San Bruno matter with the CPUC is concluded before yearend. Finally, the recent price is above the upper end of our 2017-2019 Target Price Range.</p> <p><i>Paul E. Debbas, CFA</i> January 30, 2015</p>																			
<p>(A) Diluted EPS. Excl. nonrec. gains (losses): '99, (\$2.44); '04, \$6.95; '09, 18¢; '11, (68¢); '12, (15¢); '04, nonrec. ops.: '08, 41¢. Incl. nonrec. loss: '00, \$11.83. '13 EPS don't add due to rounding. Next earnings report due mid-Feb. (B) Div'ds historically paid in mid-Jan., Apr., July, and Oct. † Div'd reinvest. plan avail. † Shareholder investment plan avail. (C) Incl. intang. in '13: \$10.76/sh. (D) In mill. (E) Rate base: net org. cost. Rate allowed on com. eq. in '13: 10.4%; earned on avg. com. eq., '13: 5.9%. Regulatory Climate: Above Average.</p>																			
<p>Company's Financial Strength B+ Stock's Price Stability 100 Price Growth Persistence 45 Earnings Predictability 70</p>																			

PINNACLE WEST NYSE-PW		RECENT PRICE	71.96	P/E RATIO	18.8	(Trailing: 19.2 Median: 15.0)	RELATIVE P/E RATIO	1.02	DIV'D YLD	3.4%	VALUE LINE																																																																																																																																																																																																																												
TIMELINESS 3 Lowered 10/10/14	High: 40.5	45.8	46.7	51.0	51.7	42.9	38.0	42.7	48.9	54.7	61.9	71.1	Target Price Range 2017	2018	2019																																																																																																																																																																																																																								
SAFETY 1 Raised 5/3/13	Low: 28.3	36.3	39.8	38.3	36.8	26.3	22.3	32.3	37.3	45.9	51.5	51.2																																																																																																																																																																																																																											
TECHNICAL 3 Raised 12/12/14	LEGENDS — 0.74 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession																																																																																																																																																																																																																																						
BETA .70 (1.00 = Market)	2017-19 PROJECTIONS <table border="1"> <tr> <th>Price</th> <th>Gain</th> <th>Ann'l Total Return</th> </tr> <tr> <td>High 65</td> <td>(-1.0%)</td> <td>1%</td> </tr> <tr> <td>Low 55</td> <td>(-2.5%)</td> <td>-2%</td> </tr> </table>															Price	Gain	Ann'l Total Return	High 65	(-1.0%)	1%	Low 55	(-2.5%)	-2%																																																																																																																																																																																																															
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CAPITAL STRUCTURE as of 9/30/14 Total Debt \$3525.8 mill. Due in 5 Yrs \$1528.1 mill. LT Debt \$3037.8 mill. LT Interest \$159.6 mill. Incl. \$13.4 mill. Palo Verde sale leaseback lessor notes. (LT interest capitalized: 4.5x) Leases, unearned: Annual rentals \$20.0 mill. Pension Assets-12/13 \$2264.1 mill. Oblig. \$2646.5 mill.																																																																																																																																																																																																																																							
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2014	.5675	.5675	.5675	.595	2.30																																																																																																																																																																																																																																		
BUSINESS: Pinnacle West Capital Corporation is a holding company for Arizona Public Service Company (APS), which supplies electricity to 1.1 million customers in most of Arizona, except about half of the Phoenix metro area, the Tucson metro area, and Mohave County in northwestern Arizona. Discontinued SunCor real estate subsidiary in '10. Electric revenue breakdown: residential, 49%; commercial, 39%; industrial, 5%; other, 7%. Generating sources: coal, 33%; nuclear, 27%; gas & other, 18%; purchased, 22%. Fuel costs: 32% of revenues. Has 6,400 employees. '13 reported deprec. rate: 3.0%. Chairman, President & CEO: Donald E. Brandt. Inc.: AZ. Address: 400 North Fifth St., P.O. Box 53999, Phoenix, AZ 85072-3999. Tel.: 602-250-1000. Internet: www.pinnaclewest.com.																																																																																																																																																																																																																																							
Pinnacle West's utility subsidiary received a rate increase that took effect at the start of the new year. Arizona Public Service paid \$182 million for a 739-megawatt stake in Units 4 and 5 of the Four Corners coal-fired plant. (It retired Units 1, 2, and 3.) In order to place these assets into the rate base, the utility's tariffs were raised by \$57.1 million (2.0%). The increase was below the \$65.4 million that APS had sought.																																																																																																																																																																																																																																							
The utility will put forth a regulatory filing this year to address rate design. Like many utilities, APS believes customers that have installed solar panels on their buildings are not paying for their use of the electric grid. The Arizona Corporation Commission (ACC) has opened a generic docket to address this matter. The ACC has two new members, but this isn't likely to slow the regulatory process.																																																																																																																																																																																																																																							
We estimate that earnings will increase 4% this year. The aforementioned rate increase should help. APS also receives rate relief annually for certain kinds of capital spending, such as for transmission. Customer growth is improving as the state's economy recovers from the real estate collapse that occurred several years ago. Our 2015 share-earnings estimate is at the midpoint of Pinnacle West's targeted range of \$3.75-\$3.95.																																																																																																																																																																																																																																							
The utility is planning to add some gas-fired generating capacity. APS intends to build 510 mw and retire 220 mw, for net incremental capacity of 290 mw. The ACC has approved the project. The company expects the project to be completed in the second quarter of 2018 at a cost of \$60 million-\$70 million.																																																																																																																																																																																																																																							
Finances are strong. The fixed-charge coverage and common-equity ratio are well above the utility norms. Earned returns on equity have improved in recent years, too.																																																																																																																																																																																																																																							
The dividend yield of Pinnacle West stock is about average for a utility. We project that, for at least the next few years, the company will maintain the 5% annual dividend growth rate that was established last fall. However, like several other electric utility equities, the recent price is above our 2017-2019 Target Price Range. Accordingly, total return potential is negative.																																																																																																																																																																																																																																							
<i>Paul E. Debbas, CFA January 30, 2015</i>																																																																																																																																																																																																																																							
(A) Diluted EPS. Excl. nonrec. losses: '02, 77¢; '09, \$1.45; excl. gains (losses) from disc. ops.: '00, 22¢; '05, (36¢); '06, 10¢; '08, 28¢; '09, (13¢); '10, 18¢; '11, 10¢; '12, (5¢); '11 EPS don't add due to rounding. Next earnings report due late Feb. (B) Div'ds historically paid in early Mar., June, Sept., & Dec. There were 5 declarations in '12. ■ Div'd reinvestment plan avail. (C) Incl. deferred charges. In '13: \$7.71/sh. (D) In mill. (E) Rate base: Fair value. Rate allowed on com. eq. in '12: 10%; earned on avg. com. eq., '13: 9.9%. Regulatory Climate: Avg.																																																																																																																																																																																																																																							
Company's Financial Strength A+ Stock's Price Stability 100 Price Growth Persistence 55 Earnings Predictability 65																																																																																																																																																																																																																																							
To subscribe call 1-800-VALUELINE																																																																																																																																																																																																																																							

PORTLAND GENERAL NYSE-POR RECENT PRICE **39.76** P/E RATIO **18.2** (Trailing: 17.9 Median: NMF) RELATIVE P/E RATIO **0.99** DIV/D YLD **2.9%** VALUE LINE

TIMELINESS **3** Lowered 12/5/14
SAFETY **2** Raised 5/4/12
TECHNICAL **3** Raised 1/9/15
BETA .80 (1.00 = Market)

2017-19 PROJECTIONS

Price	Gain	Ann'l Total Return
High 35	(-10%)	Nil
Low 25	(-35%)	-7%

Insider Decisions

F	M	A	M	J	A	S	A	S	O
to Buy	0	0	0	0	0	0	0	0	0
Options	0	0	0	0	0	0	0	0	0
to Sell	0	0	0	1	0	0	0	0	0

Institutional Decisions

1Q2014	2Q2014	3Q2014	Percent	21
to Buy	121	127	shares	14
to Sell	116	107		7
Hld's(000)	82774	82449		83632

LEGENDS
- - - 0.74 x Dividends p sh divided by Interest Rate
..... Relative Price Strength
Options: Yes
Shaded area indicates recession

Target Price Range 2017 2018 2019
64
48
40
32
24
20
16
12
8
6

% TOT. RETURN 12/14
THIS STOCK VS. ARITH. INDEX
1 yr. 29.4 6.9
3 yr. 65.6 73.7
5 yr. 122.5 107.3

On April 3, 2006, Portland General Electric's existing stock (which was owned by Enron) was canceled, and 62.5 million shares were issued to Enron's creditors or the Disputed Claims Reserve (DCR). The stock began trading on a when-issued basis that day, and regular trading began on April 10, 2006. Shares issued to the DCR were released over time to Enron's creditors until all of the remaining shares were released in June, 2007.

	2004	2005 ^c	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC 17-19
Revenues per sh	--	23.14	24.32	27.87	27.89	23.99	23.67	24.06	23.89	23.18	24.30	22.20	24.25
"Cash Flow" per sh	--	4.75	4.64	5.21	4.71	4.07	4.82	4.96	5.15	4.93	6.00	5.75	6.50
Earnings per sh ^A	--	1.02	1.14	2.33	1.39	1.31	1.66	1.95	1.87	1.77	2.15	2.25	2.50
Div'd Decl'd per sh ^B + †	--	--	.68	.93	.97	1.01	1.04	1.06	1.08	1.10	1.12	1.14	1.40
Cap'l Spending per sh	--	4.08	5.94	7.28	6.12	9.25	9.97	3.98	4.01	8.40	13.20	6.85	3.25
Book Value per sh ^C	--	19.15	19.58	21.05	21.64	20.50	21.14	22.07	22.87	23.30	24.30	25.60	29.00
Common Shs Outs't'g ^D	--	62.50	62.50	62.53	62.58	75.21	75.32	75.36	75.56	78.09	78.25	89.00	89.75
Avg Ann'l P/E Ratio	--	--	23.4	11.9	16.3	14.4	12.0	12.4	14.0	16.9	15.5	--	12.5
Relative P/E Ratio	--	--	1.26	.63	.98	.96	.76	.78	.89	.95	.80	--	.80
Avg Ann'l Div'd Yield	--	--	2.5%	3.3%	4.3%	5.4%	5.2%	4.4%	4.1%	3.7%	3.4%	--	4.4%

CAPITAL STRUCTURE as of 9/30/14
Total Debt \$2321 mill. Due in 5 Yrs \$270 mill.
LT Debt \$2251 mill. LT Interest \$104 mill.
(LT interest earned: 2.8x)
Leases, Uncapitalized Annual rentals \$11 mill.

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Revenues (\$mill)	1454.0	1446.0	1520.0	1743.0	1745.0	1804.0	1783.0	1813.0	1805.0	1810.0	1900	1975	2175	2175	2175
Net Profit (\$mill)	92.0	64.0	71.0	145.0	87.0	95.0	125.0	147.0	141.0	137.0	170	195	225	225	225
Income Tax Rate	37.0%	40.2%	33.6%	33.8%	28.7%	28.8%	30.5%	28.3%	31.4%	23.2%	26.0%	24.0%	24.0%	24.0%	24.0%
AFUDC % to Net Profit	9.8%	18.8%	33.8%	17.9%	17.2%	31.6%	17.6%	5.4%	7.1%	14.6%	31.0%	12.0%	4.0%	4.0%	4.0%
Long-Term Debt Ratio	41.1%	42.3%	43.4%	49.9%	46.2%	50.3%	53.0%	49.6%	47.1%	51.3%	53.5%	45.0%	45.5%	45.5%	45.5%
Common Equity Ratio	58.9%	57.7%	56.6%	50.1%	53.8%	49.7%	47.0%	50.4%	52.9%	48.7%	46.5%	55.0%	54.5%	54.5%	54.5%
Total Capital (\$mill)	2171.0	2076.0	2161.0	2629.0	2518.0	3100.0	3390.0	3298.0	3264.0	3735.0	4110	4140	4775	4775	4775
Net Plant (\$mill)	2275.0	2436.0	2718.0	3066.0	3301.0	3858.0	4133.0	4285.0	4392.0	4880.0	5610	5900	5875	5875	5875
Return on Total Cap'l	5.6%	4.6%	4.7%	6.9%	5.0%	4.5%	5.4%	6.2%	5.9%	5.1%	5.5%	6.0%	6.0%	6.0%	6.0%
Return on Shr. Equity	7.2%	5.3%	5.8%	11.0%	6.4%	6.2%	7.9%	8.8%	8.2%	7.5%	9.0%	8.5%	9.0%	9.0%	9.0%
Return on Com Equity ^E	7.2%	5.3%	5.8%	11.0%	6.4%	6.2%	7.9%	8.8%	8.2%	7.5%	9.0%	8.5%	9.0%	9.0%	9.0%
Retained to Com Eq	7.2%	5.3%	3.5%	6.6%	2.0%	1.5%	3.0%	4.1%	3.5%	2.9%	4.5%	4.5%	4.0%	4.0%	4.0%
All Div'ds to Net Prof	--	--	39%	40%	69%	76%	62%	54%	57%	61%	51%	49%	55%	55%	55%

Pension Assets-12/13 \$596 mill.
Oblig. \$705 mill.

Pfd Stock None

Common Stock 78,209,672 shs. as of 10/23/14

MARKET CAP: \$3.1 billion (Mid Cap)

ELECTRIC OPERATING STATISTICS

	2011	2012	2013
% Change Retail Sales (KWH)	+3.3	-8	+1.2
Avg. Indust. Use (MWH)	16573	16409	16258
Avg. Indust. Revs. per KWH (¢)	5.44	5.26	4.84
Capacity at Peak (MW)	4162	4173	4398
Peak Load, Winter (MW) ^F	3555	3597	3869
Atnd Load Factor (%)	NA	NA	NA
% Charge Claims (y-rct)	+2	+7	+9

Fixed Charge Cov. (%) 273 270 239

BUSINESS: Portland General Electric Company (PGE) provides electricity to 843,000 customers in 52 cities in a 4,000-square-mile area of Oregon, including Portland and Salem. The company is in the process of decommissioning the Trojan nuclear plant, which it closed in 1993. Electric revenue breakdown: residential, 48%; commercial, 34%; industrial, 13%; other, 5%. Generating sources: coal, 19%; gas, 16%; hydro, 16%; wind, 6%; purchased, 43%. Fuel costs: 42% of revenues. '13 reported depreciation rate: 3.7%. Has 2,600 employees. Chairman: Jack E. Davis. President and Chief Executive Officer: James J. Piro. Incorporated: Oregon. Address: 121 SW Salmon Street, Portland, Oregon 97204. Telephone: 503-464-8000. Internet: www.portlandgeneral.com.

ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Est'd '11-'13 of change (per sh)

Revenues	--	-2.5%	.5%
"Cash Flow"	--	.5%	4.5%
Earnings	--	3.0%	5.0%
Dividends	--	4.5%	4.5%
Book Value	--	2.0%	4.0%

A rate increase for Portland General Electric Company took effect at the start of 2015.

Tariffs were raised by \$15 million (about 1%), based on a return of 9.68% on a common-equity ratio of 50%. The new allowed return on equity is slightly below the previous one of 9.75%. The rate order enabled PGE to place two projects, which began commercial operation in late 2014, in the rate base. A 267-megawatt wind farm was completed at a cost that was expected to be \$500 million, and a 220-mw gas-fired peaking plant was built at a cost expected to be \$296 million. The rate hike was small because cost reductions and customer credits offset most of what would have been a much larger increase.

Following what was almost certainly its much-improved earnings tally in 2014, we estimate earnings will climb at a mid-single-digit pace this year.

Our 2014 estimate is at the midpoint of PGE's targeted range of \$2.10-\$2.20 a share. This year, the aforementioned rate order will help boost the company's profits. In addition, PGE's service territory is experiencing load growth, despite the effects of energy efficiency measures. The industrial sector is increasing its electricity usage. Our 2015 earnings estimate is \$2.25 a share.

Another generating plant is under construction.

The 440-mw base-load gas-fired facility is expected to begin commercial operation in mid-2016 at a cost of \$450 million. PGE will file a rate application next month in order to receive rate relief in 2016. Part of the increase will take effect at the start of the year, with the remainder coming when the new plant is completed.

The share count will rise significantly this year.

PGE expects to settle a forward equity sale for \$278 million in the second quarter. The company intends to use the proceeds to pay down borrowings from its credit facilities.

This stock's dividend yield is somewhat below the industry average.

The share price has already risen 5% this year. Like several other utility equities, the recent price is above our 2017-2019 Target Price Range. Thus, total return potential is negative.

Paul E. Debbas, CFA January 30, 2015

(A) Diluted EPS. Excl. nonrecurring loss: '13, 42¢. Next earnings report due mid-Feb.	Shareholder investment plan avail. (C) Incl. deferred charges. In '13: \$5.94/sh. (D) In mill. on com. eq. in '15: 9.68%; earned on avg. com. eq., '13: 7.6%. Regulatory Climate: Below Average. (F) Summer peak in '12. (G) '05 per-share data are pro forma, based on shares outstanding when stock began trading in '06.	Company's Financial Strength B++ Stock's Price Stability 100 Price Growth Persistence 50 Earnings Predictability 65
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PPL CORPORATION NYSE:PPL				RECENT PRICE	36.57	P/E RATIO	14.2	(Trailing: 18.1) Median: 14.0)	RELATIVE P/E RATIO	0.78	DIV'D YLD	4.1%	VALUE LINE									
TIMELINESS	3	Lowered 3/28/14	High: 22.2	27.1	33.7	37.3	54.6	55.2	34.4	33.1	30.3	30.2	33.6	36.8	Target Price	2017	2018	2019				
SAFETY	3	Lowered 11/28/08	Low: 15.8	19.9	25.5	27.8	34.4	26.8	24.3	23.8	24.1	26.7	28.4	29.4								
TECHNICAL	3	Lowered 8/29/14	LEGENDS 0.86 x Dividends p sh divided by Interest Rate Relative Price Strength 2-for-1 split 8/05 Options: Yes Shaded area indicates recession																			
BETA	.60	(1.00 = Market)	2017-19 PROJECTIONS Ann'l Total High Price 40 (+10%) Low Price 25 (-30%) Gain 6% Return -4%																			
Insider Decisions			D J F M A M J J A to Buy 0 0 0 0 0 0 0 0 0 Options 0 10 2 1 2 2 0 0 2 to Sell 0 6 2 3 2 4 0 0 1																			
Institutional Decisions			4Q2013 1Q2014 2Q2014 to Buy 293 291 330 to Sell 252 277 238 Hld's(000) 419762 429819 460755 Percent shares traded 18 12 6																			
1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC	17-19			
12.03	15.97	19.59	19.53	16.38	15.75	15.37	16.36	17.92	17.41	21.47	20.03	17.63	22.02	21.11	18.82	15.65	18.80	Revenues per sh	20.50			
2.43	2.56	3.32	3.51	3.20	3.60	3.59	3.84	4.26	5.10	4.71	3.47	3.66	4.59	4.84	4.64	4.30	4.70	"Cash Flow" per sh	5.25			
1.12	1.01	1.64	1.79	1.54	1.84	1.87	1.92	2.29	2.63	2.45	1.19	2.29	2.61	2.61	2.38	2.10	2.35	Earnings per sh ^A	2.50			
.67	.50	.53	.53	.72	.77	.82	.96	1.10	1.22	1.34	1.38	1.40	1.40	1.44	1.47	1.49	1.51	Div'd Decl'd per sh ^B	1.60			
.97	1.11	1.59	2.99	2.74	2.17	1.94	2.13	3.62	4.51	3.79	3.25	3.30	4.30	5.34	6.68	6.25	5.65	Cap'l Spending per sh	5.50			
5.69	5.61	6.94	6.33	6.71	9.19	11.21	11.62	13.30	14.88	13.55	14.57	16.98	18.72	18.01	19.78	20.65	21.50	Book Value per sh ^C	24.25			
314.82	287.39	290.08	293.16	331.47	354.72	378.14	380.15	385.04	373.27	374.58	377.18	483.39	578.41	581.94	630.32	670.00	670.00	Common Shs Outst'g ^D	670.00			
10.9	13.4	8.9	12.4	11.1	10.6	12.5	15.1	14.1	17.3	17.6	25.7	11.9	10.5	10.9	12.8	12.8	12.8	Avg Ann'l P/E Ratio	13.5			
.57	.76	.58	.64	.61	.60	.66	.80	.76	.92	1.06	1.71	.76	.66	.69	.72	.69	.72	Relative P/E Ratio	.85			
5.5%	3.7%	3.6%	2.4%	4.2%	4.0%	3.5%	3.3%	3.4%	2.7%	3.1%	4.5%	5.1%	5.1%	5.1%	4.8%	4.8%	4.8%	Avg Ann'l Div'd Yield	4.8%			
CAPITAL STRUCTURE as of 6/30/14				5812.0	6219.0	6899.0	6498.0	8044.0	7556.0	8521.0	12737	12286	11860	10500	12600	Revenues (\$mill)	13750					
Total Debt \$21931 mill. Due in 5 Yrs \$3998 mill.				692.0	739.0	899.0	1031.0	940.0	465.0	1009.0	1456.0	1536.0	1541.0	1405	1570	Net Profit (\$mill)	1700					
LT Debt \$20819 mill. LT Interest \$946 mill.				22.8%	14.0%	23.2%	20.7%	31.8%	21.8%	22.0%	31.0%	26.2%	23.1%	33.0%	26.2%	Income Tax Rate	26.0%					
Incl. 23 mill. units 7.75%, \$25 liq. value; 82,000 units 8.25%, \$50 stated value, conv. into com. in 2013. (LT interest earned: 2.4x)				7%	--	--	--	1%	9.5%	3.5%	4.0%	4.1%	3.7%	2.0%	2.0%	AFUDC % to Net Profit	1.0%					
Leases, Uncapitalized Annual rentals \$122 mill.				61.6%	57.5%	55.4%	54.1%	57.1%	55.2%	59.0%	61.9%	64.1%	62.3%	57.5%	57.0%	Long-Term Debt Ratio	57.5%					
Pension Assets -12/13 \$11440 mill.				37.9%	42.0%	42.2%	43.6%	40.5%	42.5%	39.8%	37.2%	35.9%	37.7%	42.5%	43.0%	Common Equity Ratio	42.5%					
Oblig. \$12734 mill.				11171	10513	12151	12747	12529	12940	20621	29071	29205	33058	32450	33500	Total Capital (\$mill)	38000					
Pfd Stock None				11209	10916	12069	12605	12416	13174	20858	27266	30032	33087	35800	38025	Net Plant (\$mill)	44600					
Common Stock 664,381,143 shs. as of 7/25/14				8.4%	9.3%	9.3%	9.8%	9.2%	5.2%	6.1%	6.5%	7.0%	6.2%	6.0%	6.0%	Return on Total Cap'l	6.0%					
MARKET CAP: \$24 billion (Large Cap)				16.1%	16.5%	16.6%	17.6%	17.5%	8.0%	11.9%	13.1%	14.7%	12.4%	10.0%	11.0%	Return on Shr. Equity	10.5%					
ELECTRIC OPERATING STATISTICS				16.3%	16.7%	17.3%	18.2%	18.2%	8.1%	12.0%	13.3%	14.6%	12.4%	10.0%	11.0%	Return on Com Equity ^E	10.5%					
Fixed Charge Cov. (%)				9.3%	8.8%	9.3%	10.0%	8.5%	NMF	5.2%	6.4%	6.7%	5.3%	3.0%	4.0%	Retained to Com Eq	4.0%					
ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Est'd '11-'13 of change (per sh)				43%	47%	47%	46%	54%	115%	58%	52%	54%	57%	69%	64%	All Div'ds to Net Prof	63%					
Revenues				2.0%	2.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
"Cash Flow"				3.0%	--	2.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Earnings				4.0%	.5%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Dividends				8.0%	3.5%	2.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
Book Value				10.0%	6.0%	4.5%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A			
QUARTERLY REVENUES (\$ mill.)				2011	2012	2013	BUSINESS: PPL Corporation (formerly PP&L Resources, Inc.) is a holding company for PPL Electric Utilities (formerly Pennsylvania Power & Light Company), which distributes electricity to 1.4 mill. customers in eastern & central PA. Acq'd Kentucky Utilities and Louisville Gas and Electric (1.2 mill. customers) 11/10. Has subs. in power generation & marketing, electricity distribution in U.K. (7.6 million customers). Sold gas distribution subsidiary in '08. The company no longer breaks out data on electric operating statistics. Fuel costs: 36% of revs. '13 reported dec. rates: 2.6%-4.5%. Has 18,100 employees. Chairman, President & CEO: William H. Spence, Inc.: PA. Address: Two North Ninth St., Allentown, PA 18101-1179. Tel.: 800-345-3085. Internet: www.pplweb.com.															
EARNINGS PER SHARE ^A				2011	2012	2013	The spinoff of PPL's nonregulated energy-supply business is on track for completion in the first or second quarter of 2015. Low power prices and rising coal costs have squeezed this operation's margins in recent years. This is one of the main reasons why earnings declined in 2013, and are likely to do so again in 2014. The agreement calls for PPL to combine its merchant generating assets with those of another company, Riverstone, to form Talen Energy. PPL stockholders would get one share of Talen for each of their PPL shares in a tax-free transaction. The deal needs the approval of the Federal Energy Regulatory Commission, Pennsylvania Public Utility Commission, and Nuclear Regulatory Commission. Costs associated with the spinoff reduced earnings by \$0.12 a share so far this year, and we include these expenses in our earnings presentation. Until the spinoff is completed, our estimates and projections will be based on PPL's current configuration. Note, too, that the board of directors won't review the dividend for a possible increase until after the move has been completed.															
QUARTERLY DIVIDENDS PAID ^B				2010	2011	2012	expect steady annual earnings and dividend growth from PPL. The company will consist of regulated utilities in Pennsylvania (transmission and distribution only), Kentucky, and the United Kingdom.															
QUARTERLY REVENUES (\$ mill.)				2010	2011	2012	The sale of PPL's hydro assets in Montana should close by yearend. The local utility is buying them for \$895 million. PPL is now reporting these assets as discontinued operations.															
EARNINGS PER SHARE ^A				2010	2011	2012	The utilities in Kentucky will file rate cases at the end of this month. Kentucky Utilities expects to request an electric rate increase of \$153 million (9.6%), based on a return of 10.5% on a common-equity ratio of 53.02%. Louisville Gas and Electric intends to seek electric and gas tariff hikes of \$30 million (2.7%) and \$14 million (4.4%), respectively, based on a return of 10.5% on a common-equity ratio of 52.75%. New rates should take effect at the start of July.															
QUARTERLY DIVIDENDS PAID ^B				2010	2011	2012	This stock offers a dividend yield that is somewhat above the utility average. Like most utility equities, 3- to 5-year total return potential is low.															
QUARTERLY REVENUES (\$ mill.)				2010	2011	2012	<i>Paul E. Debbas, CFA November 21, 2014</i>															
EARNINGS PER SHARE ^A				2010	2011	2012	Once the spinoff has been effected, we															
QUARTERLY DIVIDENDS PAID ^B				2010	2011	2012																

(A) Dil. EPS. Excl. nonrec. gain (losses): '07, (1.2¢); '10, (8¢); '11, 8¢; '13, (62¢); gains (losses) on disc. ops.: '05, (12¢); '07, 19¢; '08, 3¢; '09, (10¢); '10, (4¢); '12, (1¢); '14, 2¢. '11 EPS don't add due to rounding, '13 due to chg. in shs. Next eqs. due early Feb. (B) Div'ds historically paid in early Jan., Apr., July, & Oct. Div'd reinv. plan avail. (C) Incl. intang. In '13: \$10.18/sh. (D) In mill., adj. for split. (E) Rate base: Fair val. Rate all'd on com. eq. in PA in '13: 10.4%; in KY in '13: 10.25%; earned on avg. com. eq., '13: 12.4%. Regul. Climate: Avg. Company's Financial Strength B++ Stock's Price Stability 100 Price Growth Persistence 25 Earnings Predictability 60 To subscribe call 1-800-VALUeline

P.S. ENTERPRISE GP. NYSE-PEG										RECENT PRICE 40.95		P/E RATIO 14.8 (Trailing: 16.8 Median: 14.0)		RELATIVE P/E RATIO 0.81		DIV'D YLD 3.7%		VALUE LINE																					
TIMELINESS 3 Lowered 9/19/14	High: 22.3	26.3	34.2	36.3	49.9	52.3	34.1	34.9	35.5	34.1	37.0	42.1																											
SAFETY 1 Raised 11/23/12	Low: 16.0	19.0	24.7	29.5	32.2	22.1	23.7	29.0	28.0	28.9	29.7	31.3																											
TECHNICAL 5 Lowered 11/21/14	LEGENDS 0.82 x Dividends p sh divided by Interest Rate Relative Price Strength 2-for-1 split 2/08 Options: Yes Shaded area indicates recession																																						
BETA .75 (1.00 = Market)	2017-19 PROJECTIONS Ann'l Total Price Gain Return High 45 (+10%) 6% Low 35 (-15%) Nil																																						
Insider Decisions																																							
Institutional Decisions																																							
4Q2013 1Q2014 2Q2014 to Buy 293 261 278 to Sell 214 261 235 Hld's(000) 330450 327280 329826																																							
1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015																																							
12.78	15.01	22.83	23.84	18.62	23.54	23.09	24.74	24.07	25.28	27.94	24.57	23.31	22.42	19.33	19.71	20.75	20.75	Revenues per sh	22.75																				
2.83	2.82	2.71	3.14	3.01	2.92	3.02	3.42	3.91	4.36	4.68	4.98	5.27	5.36	4.87	5.17	5.35	5.65	"Cash Flow" per sh	6.50																				
1.40	1.56	1.78	1.85	1.88	1.88	1.52	1.79	1.85	2.59	2.90	3.08	3.07	3.11	2.44	2.45	2.50	2.65	Earnings per sh ^A	3.00																				
1.08	1.08	1.08	1.08	1.08	1.08	1.10	1.12	1.14	1.17	1.29	1.33	1.37	1.37	1.42	1.44	1.48	1.52	Div'd Decl'd per sh ^B \uparrow	1.65																				
1.15	1.34	2.31	4.99	4.03	2.86	2.64	2.04	2.01	2.65	3.50	3.55	4.27	4.12	5.09	5.56	5.75	7.10	Cap'l Spending per sh	5.25																				
10.99	9.23	9.61	10.05	8.85	11.71	12.05	11.99	13.35	14.35	15.36	17.37	19.04	20.30	21.31	22.95	23.95	25.10	Book Value per sh ^C	29.00																				
463.92	432.83	415.94	411.68	450.53	472.27	476.20	502.33	505.29	508.52	506.02	505.99	505.97	505.95	505.89	505.86	506.00	506.00	Common Shs Outstg ^D	506.00																				
12.7	12.5	10.3	12.0	10.0	10.6	14.3	16.5	17.8	16.5	13.6	10.0	10.4	10.4	12.8	13.5	13.5	13.5	Avg Ann'l P/E Ratio	13.0																				
.66	.71	.67	.61	.55	.60	.76	.88	.96	.88	.82	.67	.66	.65	.81	.76	.76	.76	Relative P/E Ratio	.80																				
6.1%	5.5%	5.9%	4.9%	5.7%	5.4%	5.1%	3.8%	3.5%	2.7%	3.3%	4.3%	4.3%	4.2%	4.6%	4.4%	4.4%	4.4%	Avg Ann'l Div'd Yield	4.2%																				
CAPITAL STRUCTURE as of 9/30/14 Total Debt \$8963 mill. Due in 5 Yrs \$3380 mill. LT Debt \$8389 mill. LT Interest \$372 mill. Incl. \$68 mill. securitized bonds. (LT interest earned: 5.8x)										10996	12430	12164	12853	14139	12431	11793	11343	9781.0	9968.0	10500	10500	Revenues (\$mill)	11500																
Leases, Uncapitalized Annual rentals \$13 mill. Pension Assets-12/13 \$5116 mill. Prd Stock None Oblig. \$4812 mill.										725.0	862.0	934.0	1323.0	1477.0	1567.0	1557.0	1577.0	1239.0	1243.0	1260	1355	Net Profit (\$mill)	1550																
Common Stock 505,959,967 shs. as of 10/15/14 MARKET CAP: \$21 billion (Large Cap)										38.1%	38.6%	36.6%	44.5%	45.9%	42.3%	40.5%	40.4%	36.2%	39.5%	40.0%	40.0%	Income Tax Rate	40.0%																
ELECTRIC OPERATING STATISTICS										15.9%	11.5%	4.7%	2.7%	3.2%	3.8%	5.5%	2.7%	4.8%	4.6%	5.0%	5.0%	AFUDC % to Net Profit	4.0%																
2011 2012 2013 % Change Retail Sales (KWH) -2.6 -2.1 -.9 Avg. Indust. Use (MWH) N/A N/A N/A Avg. Indust. Revs. per KWH(c) N/A N/A N/A Capacity at Peak (Mw) N/A N/A N/A Peak Load, Summer (Mw) N/A N/A N/A Annual Load Factor (%) N/A N/A N/A % Change Customers (avg.) +.2 N/A N/A										69.0%	64.9%	60.3%	54.0%	50.5%	46.3%	44.8%	42.1%	38.3%	40.4%	41.0%	42.0%	Long-Term Debt Ratio	44.5%																
Fixed Charge Cov. (%) 580 504 529										30.6%	34.6%	39.2%	45.0%	49.0%	53.2%	55.2%	57.9%	61.7%	59.6%	59.0%	58.0%	Common Equity Ratio	55.5%																
ANNUAL RATES Past Past Est'd '11-'13 of change (per sh) 10 Yrs. 5 Yrs. to '17-'19										18744	17381	17197	16041	15856	16513	17452	17731	17467	19470	20575	21875	Total Capital (\$mill)	26600																
Revenues -5.5% -4.5% 2.0% "Cash Flow" 5.5% 3.5% 4.0% Earnings 3.5% 2.0% 2.0% Dividends 2.5% 3.5% 2.5% Book Value 7.5% 8.5% 6.0%										13750	13336	13002	13275	14433	15440	16390	17849	19736	21645	23175	25300	Net Plant (\$mill)	29700																
QUARTERLY REVENUES (\$ mill.) Full Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Year										6.3%	7.3%	7.7%	10.4%	11.2%	11.0%	10.4%	10.2%	8.1%	7.5%	7.0%	7.0%	Return on Total Cap'l	7.0%																
2011 3354 2469 2884 2636 11343 2012 2875 2098 2402 2406 9781 2013 2786 2310 2554 2318 9968 2014 3223 2249 2641 2387 10500 2015 2950 2400 2700 2450 10500										12.5%	14.1%	13.7%	17.9%	18.8%	17.7%	16.2%	15.4%	11.5%	10.7%	10.5%	10.5%	Return on Shr. Equity	10.5%																
EARNINGS PER SHARE ^A Full Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Year										12.6%	14.2%	13.8%	18.1%	19.0%	17.8%	16.2%	15.4%	11.5%	10.7%	10.5%	10.5%	Return on Com Equity ^E	10.5%																
2011 .91 .63 .86 .71 3.11 2012 .97 .42 .68 .37 2.44 2013 .63 .66 .77 .39 2.45 2014 .76 .42 .87 .45 2.50 2015 1.00 .45 .75 .45 2.65										3.5%	5.3%	5.3%	9.9%	10.5%	10.1%	9.0%	8.6%	4.8%	4.4%	4.0%	4.5%	Retained to Com Eq	5.0%																
QUARTERLY DIVIDENDS PAID ^B \uparrow Full Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Year										73%	63%	62%	45%	45%	43%	45%	44%	58%	59%	59%	57%	All Div'ds to Net Prof	54%																
2010 .343 .343 .343 .343 1.37 2011 .343 .343 .343 .343 1.37 2012 .355 .355 .355 .355 1.42 2013 .36 .36 .36 .36 1.44 2014 .37 .37 .37 .37										BUSINESS: Public Service Enterprise Group Incorporated is a holding company for Public Service Electric and Gas Company (PSE&G), which serves 2.2 million electric and 1.8 million gas customers in New Jersey, and PSEG Power LLC, a nonregulated power generator with nuclear, gas, and coal-fired plants in the Northeast. PSEG Energy Holdings is involved in renewable energy.										Public Service Enterprise Group's utility subsidiary is benefiting from its investment in electric transmission. Public Service Electric and Gas expects to spend \$6.8 billion on transmission from 2014 through 2018. The utility receives current cost recovery on this spending through a formula rate plan, and at an allowed return on equity that is more than one percentage point higher than its allowed ROE on distribution. In the first nine months of 2014, increased transmission income boosted the company's earnings by \$0.10 a share. Under the formula rate plan, PSE&G has asked the Federal Energy Regulatory Commission for a \$182 million rate increase, effective at the start of 2015.										We expect corporate profits to advance this year and next, despite margin pressure at PSEG Power. This non-utility subsidiary continues to face the effects of lower prices, so income here is headed down in 2014. We also include mark-to-market accounting losses, which were greater in the first nine months of 2014 than in the same period a year earlier. It appears that the worst is over, however. In addition, proposed changes to the wholesale markets in PSEG's region would benefit owners of generating assets. Note that PSEG Power will build a \$600 million, 450-megawatt gas-fired plant in Connecticut if the company's bid into the market in 2015 is accepted.									
There are other factors benefiting PSEG, too. PSE&G has investment opportunities beyond transmission — most notably, its \$1.22 billion "Energy Strong" plan to enhance system reliability. (This arose from the effects of Hurricane Sandy in the fall of 2012.) The company is benefiting from its contract to run the electric utility on Long Island. Finally, lower pension expense is helping the bottom line.										High-quality PSEG stock has been one of the top-performing utility equities in 2014. Year to date, the price has risen 28%. The utility's prospects are good, and investors are also attracted to the prospects for a long-term recovery at PSEG Power. Following the stock's run-up, however, the dividend yield is only about average for a utility, and 3- to 5-year total return potential is negligible.										Company's Financial Strength A++ Stock's Price Stability 95 Price Growth Persistence 30 Earnings Predictability 85																			
(A) Dil. EPS. Excl. nonrecr. gain (losses): '99, '08, 40¢; '11, 13¢. Next egs. report due late Feb. (B) Div'ds historically paid in late Mar., June, Sept., and Dec. \uparrow Div'd reinvestment from disc. ops.: '05, (33¢); '06, 12¢; '07, 3¢; '08, 96¢; '09, 6¢; '11, (34¢); '12, 7¢; gains (loss) from disc. ops.: '05, (33¢); '06, 12¢; '07, 3¢; '08, 40¢; '11, 13¢. Next egs. report due late Feb. (B) Div'ds historically paid in late Mar., June, Sept., and Dec. \uparrow Div'd reinvestment from disc. ops.: '05, (33¢); '06, 12¢; '07, 3¢; '08, 96¢; '09, 6¢; '11, (34¢); '12, 7¢; gains (loss) from disc. ops.: '05, (33¢); '06, 12¢; '07, 3¢; '08, 40¢; '11, 13¢. Next egs. report due late Feb. (B) Div'ds historically paid in late Mar., June, Sept., and Dec. \uparrow Div'd reinvestment from disc. ops.: '05, (33¢); '06, 12¢; '07, 3¢; '08, 96¢; '09, 6¢; '11, (34¢); '12, 7¢; gains (loss) from disc. ops.: '05, (33¢); '06, 12¢; '07, 3¢; '08, 40¢; '11, 13¢. Next egs. report due late Feb. 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SCANA CORP. NYSE:SCG		RECENT PRICE	P/E RATIO	(Trailing: 15.0) Median: 14.0	RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE	
TIMELINESS 3 Lowered 10/10/14 SAFETY 2 Lowered 9/10/99 TECHNICAL 4 Lowered 11/14/14 BETA .75 (1.00 = Market)		57.01	15.0		0.82	3.8%		
2017-19 PROJECTIONS Price: High 60, Low 45 Gain: +5%, -20% Ann'l Total Return: 5%, -1%							Target Price Range 2017: 48-64 2018: 40-48 2019: 32-40	
Insider Decisions D J F M A M J J A to Buy: 0 0 1 0 0 0 0 0 0 Options: 0 0 0 0 0 0 0 0 0 to Sell: 0 0 1 0 1 1 0 0 0		Institutional Decisions 4Q2013 1Q2014 2Q2014 to Buy: 168 194 192 to Sell: 174 153 140 Hld's(000): 71165 72621 75177					% TOT. RETURN 10/14 THIS STOCK: 1 yr. 22.7%, 3 yr. 47.4%, 5 yr. 103.3% VL ARITH. INDEX: 10.1, 67.5, 124.6	
MARKET CAP: \$8.1 billion (Large Cap) ELECTRIC OPERATING STATISTICS 2011 2012 2013 % Change Retail Sales (KWH): -3.4, -3.9, +3.0 Avg. Indust. Use (MWH): 8129, 8055, 8180 Avg. Indust. Revs. per KWH (\$): 6.87, 7.09, 7.27 Capacity at Year-end (Mw): 5642, 5533, 5237 Peak Load, Summer (Mw): 4885, 4761, 4574 Annual Load Factor (%): 57.3, 56.8, 58.8 % Change Customers (yr-end): +5, +9, +1.2		Business Breakdown: residential, 44%; commercial, 33%; industrial, 18%; other, 5%.					Revenues per sh 36.00 "Cash Flow" per sh 8.00 Earnings per sh 4.25 Div'd Decl'd per sh 2.35 Cap'l Spending per sh 9.25 Book Value per sh 43.75 Common Shs Outst'g 157.00 Avg Ann'l P/E Ratio 12.5 Relative P/E Ratio .80 Avg Ann'l Div'd Yield 4.5%	
MARKET CAP: \$8.1 billion (Large Cap) ELECTRIC OPERATING STATISTICS 2011 2012 2013 % Change Retail Sales (KWH): -3.4, -3.9, +3.0 Avg. Indust. Use (MWH): 8129, 8055, 8180 Avg. Indust. Revs. per KWH (\$): 6.87, 7.09, 7.27 Capacity at Year-end (Mw): 5642, 5533, 5237 Peak Load, Summer (Mw): 4885, 4761, 4574 Annual Load Factor (%): 57.3, 56.8, 58.8 % Change Customers (yr-end): +5, +9, +1.2		Business Breakdown: residential, 44%; commercial, 33%; industrial, 18%; other, 5%.					Revenues per sh 36.00 "Cash Flow" per sh 8.00 Earnings per sh 4.25 Div'd Decl'd per sh 2.35 Cap'l Spending per sh 9.25 Book Value per sh 43.75 Common Shs Outst'g 157.00 Avg Ann'l P/E Ratio 12.5 Relative P/E Ratio .80 Avg Ann'l Div'd Yield 4.5%	
ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Past Est'd '11-'13 of change (per sh) 10 Yrs. 5 Yrs. to '17-'19 Revenues: 5%, -4.5%, 1.5% "Cash Flow": 3.0%, 2.0%, 4.0% Earnings: 3.0%, 3.0%, 5.0% Dividends: 4.5%, 2.5%, 3.0% Book Value: 4.5%, 4.5%, 5.5%		Business Breakdown: residential, 44%; commercial, 33%; industrial, 18%; other, 5%.					Revenues per sh 36.00 "Cash Flow" per sh 8.00 Earnings per sh 4.25 Div'd Decl'd per sh 2.35 Cap'l Spending per sh 9.25 Book Value per sh 43.75 Common Shs Outst'g 157.00 Avg Ann'l P/E Ratio 12.5 Relative P/E Ratio .80 Avg Ann'l Div'd Yield 4.5%	
QUARTERLY REVENUES (\$ mill.) Cal-ender Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 1281 1000 1092 1036 4409.0 2012 1107 908 1038 1123 4176.0 2013 1311 1016 1051 1117 4495.0 2014 1590 1026 1121 1163 4900 2015 1500 1075 1125 1200 4900		Business Breakdown: residential, 44%; commercial, 33%; industrial, 18%; other, 5%.					Revenues per sh 36.00 "Cash Flow" per sh 8.00 Earnings per sh 4.25 Div'd Decl'd per sh 2.35 Cap'l Spending per sh 9.25 Book Value per sh 43.75 Common Shs Outst'g 157.00 Avg Ann'l P/E Ratio 12.5 Relative P/E Ratio .80 Avg Ann'l Div'd Yield 4.5%	
EARNINGS PER SHARE Cal-ender Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2011 1.00 .43 .81 .75 2.97 2012 .91 .54 .91 .78 3.15 2013 1.11 .60 .94 .73 3.39 2014 1.37 .68 1.01 .74 3.80 2015 1.35 .70 1.05 .80 3.90		Business Breakdown: residential, 44%; commercial, 33%; industrial, 18%; other, 5%.					Revenues per sh 36.00 "Cash Flow" per sh 8.00 Earnings per sh 4.25 Div'd Decl'd per sh 2.35 Cap'l Spending per sh 9.25 Book Value per sh 43.75 Common Shs Outst'g 157.00 Avg Ann'l P/E Ratio 12.5 Relative P/E Ratio .80 Avg Ann'l Div'd Yield 4.5%	
QUARTERLY DIVIDENDS PAID Cal-ender Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2010 .47 .475 .475 .475 1.90 2011 .475 .485 .485 .485 1.93 2012 .485 .495 .495 .495 1.97 2013 .495 .5075 .5075 .5075 2.02 2014 .5075 .525 .525 .525		Business Breakdown: residential, 44%; commercial, 33%; industrial, 18%; other, 5%.					Revenues per sh 36.00 "Cash Flow" per sh 8.00 Earnings per sh 4.25 Div'd Decl'd per sh 2.35 Cap'l Spending per sh 9.25 Book Value per sh 43.75 Common Shs Outst'g 157.00 Avg Ann'l P/E Ratio 12.5 Relative P/E Ratio .80 Avg Ann'l Div'd Yield 4.5%	

(A) Dil eggs. Excl. nonrec. gains (losses): '99, 29%; '00, 28%; '01, \$3.00; '02, (\$3.72); '03, 31%; '04, (23%); '05, 3%; '06, 9%. '11 EPS don't add due to change in shs., '12 & '13 due to round- ing. Next earnings report due mid-Feb. (B) Div'ds historically paid in early Jan., Apr., July, and Oct. ■ Div'd reinv. plan avail. (C) Incl. intang. In '13: \$9.65/sh. (D) In mill. (E) Rate base: Net orig. cost. Rate allowed on com. eq. in SC: 10.25% elec. In '13, 10.25% gas in '05; in NC: 10.6% in '08; earned on avg. com. eq., '13: 10.7%. Regulatory Climate: Above Avg.

Company's Financial Strength B++
Stock's Price Stability 100
Price Growth Persistence 50
Earnings Predictability 100

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Paul E. Debbas, CFA November 21, 2014

SEMPRA ENERGY NYSE:SRE				RECENT PRICE	P/E RATIO	Trailing: 24.8 Median: 12.0	RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE
TIMELINESS	3	Raised 9/5/14	High: 30.9	113.67	24.3	1.32	2.4%		
SAFETY	2	Lowered 2/14/00	Low: 22.3						
TECHNICAL	3	Raised 12/19/14	37.9						
BETA	.75	(1.00 = Market)	47.9						
2017-19 PROJECTIONS			57.3						
Price	Gain	Ann'l Total Return	66.4						
High 105	(-10%)	7%	63.0						
Low 80	(-30%)	-5%	57.2						
Insider Decisions			52.2						
Institutional Decisions			50.9						
CAPITAL STRUCTURE as of 9/30/14			57.2						
Leases, Uncapitalized Annual rentals \$85 mill.			56.0						
Pension Assets-12/13 \$2789 mill.			72.9						
Pfd Stock \$20 mill. Pfd Div'd \$1.2 mill.			93.0						
Common Stock 246,218,250 shs. as of 10/31/14			116.3						
MARKET CAP: \$28 billion (Large Cap)			129.9						
ELECTRIC OPERATING STATISTICS			132.9						
ANNUAL RATES			163.9						
QUARTERLY REVENUES			193.9						
EARNINGS PER SHARE			223.9						
QUARTERLY DIVIDENDS PAID			253.9						
BUSINESS: Sempra Energy is a holding co. for San Diego Gas & Electric Company, which sells electricity & gas mainly in San Diego County, & Southern California Gas Company, which distributes gas to most of Southern California. Customers: 1.4 mill. electric, 6.6 mill. gas. Elec. rev. breakdown: residential, 46%; commercial, 38%; industrial, 9%; other, 7%. Purchases most of its power; the rest is			283.9						
Sempra Energy has begun construction of a large project. The company is converting its Cameron liquefied natural gas terminal from an import to an export facility. Sempra has a 50.2% stake in the project, which is expected to cost \$9 billion-\$10 billion. It is expected to be completed in 2018 and should provide Sempra with net profit of \$325 million-\$350 million annually. The project might be expanded, too; the company will file a request with the Federal Energy Regulatory Commission this year.			313.9						
Sempra's utilities have filed general rate cases. Southern California Gas requested a \$256 million increase, and San Diego Gas & Electric asked for a total (electric and gas) hike of \$133 million. An order from the California regulators is expected by yearend, but even if it slips into 2016, it will be retroactive to the start of next year.			343.9						
Earnings should improve in 2015. International investments are a particular area of focus for Sempra. The company has a lot of projects in various stages of development in Latin America and South America, especially natural gas pipelines in Mexico.			373.9						
An asset sale is expected to close soon. Sempra has agreed to sell its 50% stake in a nonregulated gas-fired power plant. The company expects to book an undisclosed gain on the sale, which we will exclude from our earnings presentation as a non-recurring item.			403.9						
A new corporate structure might be in Sempra's future. The company is evaluating changes such as the formation of a "yieldco" that NRG Energy formed in 2013 or a master limited partnership and Next-Era Energy formed in 2014. Sempra expects to make an announcement around the end of the current quarter. Our estimates and projections are based on the company's current configuration.			433.9						
This stock is expensively priced. Like several other utility equities, it is trading above our 2017-2019 Target Price Range. Perhaps Wall Street is anticipating some kind of corporate structure move. The stock doesn't stand out among utilities for its dividend yield, even though we estimate a sizable increase in the payout in the current quarter.			463.9						
Paul E. Debbas, CFA January 30, 2015			493.9						
Company's Financial Strength			523.9						
Stock's Price Stability			553.9						
Price Growth Persistence			583.9						
Earnings Predictability			613.9						

(A) Dil. EPS. Excl. nonrec. gains (losses): '05, 17¢; '06, (6¢); '09, (26¢); '10, (\$1.05); '11, \$1.15; '12, (98¢); '13, (30¢) net; gain (losses) from disc. ops.: '04, (10¢); '05, (4¢); '06, \$1.21; '07, (10¢); '12 EPS don't add due to rounding. Next egs. report due late Feb. (B) Div'ds histor. paid mid-Jan., Apr., July & Oct. (C) Div'd reinvest. plan avail. (C) Incl. intang. in '13: \$16.35/sh. (D) In mill. (E) Rate base: Net orig. cost. Rate allowed on com. eq.; SDG&E in '13: 10.3%; SoCalGas in '13: 10.1%; eam. on avg. com. eq., '13: 9.6%. Reg. Climate: Above Avg.

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UIL HOLDINGS NYSE-UIL

RECENT PRICE 41.63	P/E RATIO 16.5 (Trailing: 21.2 Median: 17.0)	RELATIVE P/E RATIO 0.91	DIV'D YLD 4.2%	VALUE LINE										
TIMELINESS 3 Lowered 4/4/14	SAFETY 2 Raised 2/29/08	TECHNICAL 3 Lowered 10/24/14	BETA .80 (1.00 = Market)	2017-19 PROJECTIONS										
High: 27.6	32.8	33.7	43.8	43.0	37.8	31.2	31.3	35.8	37.7	42.1	42.6	Target Price Range		
Low: 18.5	25.1	27.4	27.4	27.0	25.1	17.0	23.8	28.6	32.3	35.9	34.3	2017	2018	2019
LEGENDS 0.81 x Dividends p sh divided by Interest Rate Relative Price Strength 67% Div 7/06 Options: Yes Shaded area indicates recession														
2017-19 PROJECTIONS Price Gain Ann'l Total Return High 50 (+20%) 8% Low 35 (-15%) Nil														
Insider Decisions D J F M A M J J A to Buy 0 0 0 1 0 0 0 0 0 0 Options 0 0 0 0 0 0 0 0 0 0 to Sell 0 0 0 0 0 0 0 0 0 0														
Institutional Decisions 4Q2013 1Q2014 2Q2014 to Buy 95 111 93 to Sell 70 69 86 Hld's(000) 37878 40064 38533														

Year	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	© VALUE LINE PUB. LLC	17-19
29.34	29.01	37.54	46.15	47.55	40.39	45.87	49.88	34.03	39.23	37.69	29.91	29.22	28.52	29.05	29.95	29.95	29.95	29.95	Revenues per sh	33.50
5.34	4.67	5.53	6.61	5.89	4.69	4.37	4.13	4.65	5.48	5.93	5.09	3.65	5.33	5.65	5.51	5.70	5.90	5.90	"Cash Flow" per sh	6.45
1.80	2.23	2.56	2.53	1.85	1.24	1.54	1.30	1.86	1.87	1.89	1.94	1.99	1.96	2.02	2.28	2.20	2.50	2.50	Earnings per sh ^A	2.75
1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	1.73	Div'd Decl'd per sh ^B	1.73
1.63	1.48	2.31	2.01	2.41	2.19	2.04	2.25	3.09	9.92	8.57	4.12	4.03	6.48	5.67	5.38	5.20	5.45	5.45	Cap'l Spending per sh	7.90
19.05	19.55	20.42	21.25	20.28	20.65	22.84	22.39	18.53	18.55	18.85	19.15	21.31	21.61	21.95	23.85	24.45	25.30	25.30	Book Value per sh ^C	29.05
23.39	23.44	23.46	23.53	23.79	23.86	24.01	24.32	24.86	25.03	25.17	29.98	50.51	50.65	50.87	56.75	56.75	56.75	56.75	Common Shs Outs't'g ^E	56.75
16.3	12.6	10.8	11.5	15.0	18.0	18.7	23.5	18.7	18.4	16.7	12.7	14.0	16.4	17.2	16.9	16.9	16.9	16.9	Avg Ann'l P/E Ratio	16.0
.85	.72	.70	.59	.82	1.03	.99	1.25	1.01	.98	1.01	.85	.89	1.03	1.09	.95	.95	.95	.95	Relative P/E Ratio	1.00
5.9%	6.2%	6.2%	5.9%	6.2%	7.7%	6.0%	5.7%	5.0%	5.0%	5.5%	7.0%	6.2%	5.4%	4.9%	4.5%	4.5%	4.5%	4.5%	Avg Ann'l Div'd Yield	3.6%

Year	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Revenues (\$mill)	1900
1101.3	1213.1	846.0	982.0	948.7	948.7	896.6	997.7	1570.4	1486.5	1618.7	1650	1700	Revenues (\$mill)	1900						
36.9	31.4	45.4	46.7	48.1	54.3	70.3	99.7	103.7	103.7	120.3	120	135	Net Profit (\$mill)	165						
45.4%	44.1%	31.2%	39.5%	42.2%	38.0%	38.6%	38.5%	41.9%	37.7%	38.0%	40.0%	40.0%	Income Tax Rate	40.0%						
1.1%	9.0%	8.0%	8.3%	8.3%	10.0%	26.3%	12.1%	12.1%	10.0%	10.0%	10.0%	10.0%	AFUDC % to Net Profit	10.0%						
47.2%	47.2%	47.0%	50.8%	53.6%	54.0%	58.4%	58.6%	58.9%	56.0%	58.0%	58.0%	58.0%	Long-Term Debt Ratio	58.0%						
52.8%	52.8%	53.0%	49.2%	46.4%	46.0%	41.6%	41.4%	41.1%	44.0%	42.0%	42.0%	42.0%	Common Equity Ratio	42.0%						
1039.6	1031.5	869.2	943.6	1023.6	1247.7	2587.9	2642.7	2716.9	3077.7	3285	3430	3430	Total Capital (\$mill)	3955						
563.9	592.1	647.0	878.4	1073.6	1153.0	2327.5	2570.4	2787.4	3068.7	3220	3365	3365	Net Plant (\$mill)	3915						
4.5%	4.1%	6.5%	6.2%	6.1%	5.8%	3.7%	5.2%	5.4%	5.3%	5.5%	5.5%	5.5%	Return on Total Cap'l	6.0%						
6.7%	5.8%	9.9%	10.1%	10.1%	9.5%	6.5%	9.1%	9.3%	8.9%	9.0%	9.5%	9.0%	Return on Shr. Equity	10.0%						
6.7%	5.8%	9.9%	10.1%	10.1%	9.5%	6.5%	9.1%	9.3%	8.9%	9.0%	9.5%	9.0%	Return on Com Equity ^D	10.0%						
NMF	NMF	NMF	3.1%	1.0%	1.2%	1.7%	1.1%	1.5%	2.4%	2.5%	3.5%	3.5%	Retained to Com Eq	4.5%						
112%	NMF	117%	70%	90%	88%	74%	88%	84%	73%	70%	65%	65%	All Div'ds to Net Prof	55%						

CAPITAL STRUCTURE as of 9/30/14
 Total Debt \$1720 mill. Due in 5 Yrs. \$131.9 mill.
 LT Debt \$1714 mill. LT Interest \$75.0 mill.
 (LT interest earned: 3.0x)
 Leases, Uncapitalized: Ann. rentals \$4.5 mill.

Pension Assets-12/13 \$688 mill. **Oblig.** \$859 mill.

Pfd Stock None

Common Stock 56,546,266 shs. as of 10/31/14

MARKET CAP: \$2.4 billion (Mid Cap)

BUSINESS: UIL Holdings, through its subsidiaries, operates as one of the largest regulated utility companies in Connecticut. Business consists of electric distribution/transmission operations of The United Illuminating Company and natural gas transportation/distribution operations of The Southern Connecticut Gas Company, The Connecticut Natural Gas Company, and The Berkshire Gas Company. Revenue distribution by class: residential, 49%; commercial, 24%; industrial, 6%; other, 21%. Fuel costs: 36% of revenues; O&M costs, 24%. Has 1,895 employees as of 12/13. President & Chief Executive Officer: James P. Torgerson, Inc.: CT. Address: 157 Church Street, P.O. Box 1564, New Haven, CT. 06506-0901. Telephone: 203-499-2000. Internet: www.uil.com.

UIL Holdings has decided to continue to pursue its asset purchase agreement with the City of Philadelphia. On October 27th, the proposed acquisition of Philadelphia Gas Works (PGW), which was subject to approvals by the Pennsylvania Public Utility Commission and the Philadelphia City Council, was rejected by the city's regulators. The Council announced that it would not sanction the planned asset purchase agreement, according to which UIL Holdings would acquire Philadelphia Gas Works for a cash price of \$1.86 billion. The transaction was expected to enhance the scope of UIL's operations by expanding its natural gas business. That said, the utility company recently announced that it intends to continue pursuing the Philadelphia Gas Works transaction, as the deal would be strategically beneficial for UIL Holdings in the long term. The City Council still has time to consider its decision in its upcoming meetings. However, without the council's approval the purchase agreement will terminate automatically on December 31st, 2014.

We have lowered our full-year share-net estimate. Management recently narrowed its guidance for 2014 to \$2.17-\$2.33 per share, from its earlier guidance of \$2.15-\$2.35. So far in 2014, earnings have been impacted by higher-than-anticipated uncollectible expenses. This is largely due to higher customer bills owing to a cold winter and a bankruptcy in the electric business. Our share-net estimate for 2014 of \$2.20 is at the lower end of the company's new target range. Additionally, even though the PGW transaction would be accretive to earnings in the long term, our estimates do not reflect the potential Philadelphia Gas Works acquisition. **This equity is currently an attractive selection for income-oriented investors.** This neutrally ranked stock offers a strong dividend compared to others in the utility industry. Its dividend yield of approximately 4.2% is currently above the utility industry average. Moreover, this equity bears an Above-Average rank for Safety (2) and Financial Strength (B++). Income oriented accounts looking for a conservative investment may want to consider this stock.

Cal- Year	2011	2012	2013	2014	2015	Full Year
QUARTERLY REVENUES (\$mill.)	Mar.31	Jun.30	Sep.30	Dec.31		Full Year
2011	561.1	314.0	321.4	373.9		1570.4
2012	458.3	283.5	323.8	420.9		1486.5
2013	548.0	319.1	316.5	435.1		1618.7
2014	571.2	334.8	293.0	457		1650
2015	590	330	360	420		1700
EARNINGS PER SHARE ^A	Mar.31	Jun.30	Sep.30	Dec.31		Full Year
2011	1.02	.28	.24	.42		1.96
2012	.92	.23	.31	.56		2.02
2013	1.01	.35	.31	.61		2.28
2014	.97	.16	.22	.85		2.20
2015	1.10	.35	.40	.85		2.50
QUARTERLY DIVIDENDS PAID ^B	Mar.31	Jun.30	Sep.30	Dec.31		Full Year
2010	.432	.432	.432	.432		1.73
2011	.432	.432	.432	.432		1.73
2012	.432	.432	.432	.432		1.73
2013	.432	.432	.432	.432		1.73
2014	.432	.432	.432	.432		1.73

Company's Financial Strength B++
Stock's Price Stability 90
Price Growth Persistence 45
Earnings Predictability 85

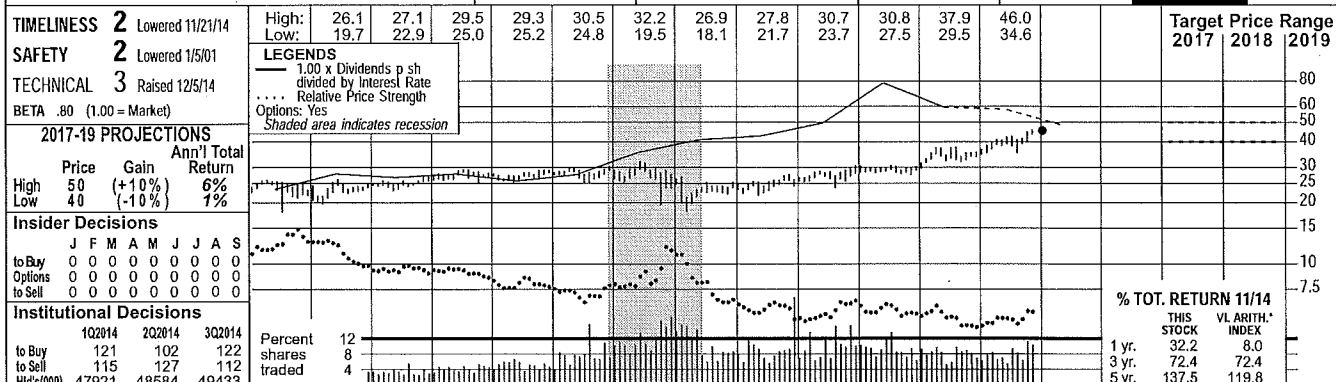
(A) EPS basic. Excl. nonrecur. gains (losses): '00, 4¢; '03, (26¢); '04, \$2.14; '06, (\$5.07); '10, (47¢). Next eps. report due in late Feb. (B) Div'ds historically paid in early March, June, Sept., and Dec. (C) Div'd reinvest. plan avail. (D) on average common equity in '13: 8.5%. (E) In millions. Regul. Clim.: Below Average. Adjusted for stock dividend.

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VECTREN CORP. NYSE-WC

RECENT PRICE **45.46** P/E RATIO **19.9** (Trailing: 23.6 Median: 16.0) RELATIVE P/E RATIO **1.08** DIV'D YLD **3.3%** VALUE LINE



Category	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004
Revenues per sh	39.55	31.65	27.16	28.39	26.06	25.76	30.67	29.88	26.83	26.62	22.26
"Cash Flow" per sh	7.45	6.15	5.03	4.71	4.44	4.40	3.97	4.29	3.69	3.87	3.27
Earnings per sh A	3.00	2.40	1.94	1.65	1.73	1.79	1.63	1.83	1.44	1.81	1.42
Div'd Decl'd per sh B=†	1.75	1.54	1.41	1.39	1.37	1.35	1.31	1.27	1.23	1.19	1.15
Cap'l Spending per sh	7.00	4.80	4.45	3.92	3.39	3.33	4.83	4.38	3.70	3.04	3.66
Book Value per sh C	21.50	19.95	18.57	17.89	17.61	17.23	16.68	16.68	15.43	15.01	14.42
Common Shs Outst'g D	86.00	84.00	82.20	81.90	81.70	81.10	81.03	76.36	76.10	76.19	75.90
Avg Ann'l P/E Ratio	15.0	15.0	15.0	15.8	15.0	12.9	16.8	15.3	18.9	15.1	17.6
Relative P/E Ratio	.95	1.16	.95	.99	.95	.86	1.01	.81	1.02	.80	.93
Avg Ann'l Div'd Yield	3.9%	4.2%	4.8%	5.1%	5.9%	5.5%	4.8%	4.5%	4.4%	4.4%	4.6%

Category	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004
Revenues (\$mill)	3400	2750	2491.2	2325.2	2129.5	2088.9	2484.7	2281.9	2041.6	2028.0	1689.8
Net Profit (\$mill)	260	200	136.6	141.6	133.7	145.0	129.0	143.1	108.8	136.8	108.0
Income Tax Rate	35.0%	35.0%	34.2%	37.9%	35.8%	26.5%	37.1%	34.7%	21.8%	24.4%	26.5%
AFUDC % to Net Profit	4.0%	4.0%	4.1%	--	--	4.1%	2.9%	2.8%	3.8%	1.4%	3.0%
Long-Term Debt Ratio	53.0%	51.0%	50.4%	51.6%	49.9%	52.4%	48.0%	50.2%	50.7%	51.2%	48.1%
Common Equity Ratio	47.0%	48.0%	46.7%	48.4%	50.1%	47.6%	52.0%	49.8%	49.3%	48.8%	51.8%
Total Capital (\$mill)	3950	3250	3079.5	3025.1	2874.1	2937.7	2599.5	2479.1	2382.2	2341.3	2111.5
Net Plant (\$mill)	4000	3550	3224.3	3032.6	2955.4	2878.8	2720.3	2539.7	2385.5	2251.9	2156.2
Return on Total Cap'l	8.0%	7.0%	6.4%	6.2%	6.1%	6.3%	6.5%	7.2%	6.0%	7.2%	6.4%
Return on Shr. Equity	14.0%	12.0%	10.4%	9.7%	9.3%	10.4%	9.5%	11.6%	9.3%	12.0%	9.9%
Return on Com Equity E	14.0%	12.0%	10.4%	9.7%	9.3%	10.4%	9.5%	11.6%	9.3%	12.0%	9.9%
Retained to Com Eq	7.0%	4.5%	3.0%	1.9%	1.6%	2.6%	2.0%	3.8%	1.3%	4.0%	1.9%
All Div'ds to Net Prof	58%	65%	71%	80%	83%	75%	80%	67%	86%	86%	81%

Category	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004
Revenues (\$mill)	3400	2750	2491.2	2325.2	2129.5	2088.9	2484.7	2281.9	2041.6	2028.0	1689.8
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Long-Term Debt Ratio	53.0%	51.0%	50.4%	51.6%	49.9%	52.4%	48.0%	50.2%	50.7%	51.2%	48.1%
Common Equity Ratio	47.0%	48.0%	46.7%	48.4%	50.1%	47.6%	52.0%	49.8%	49.3%	48.8%	51.8%
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WESTAR ENERGY NYSE-WR										RECENT PRICE	P/E RATIO	Trailing: 16.8 Median: 14.0	RELATIVE P/E RATIO	DIV'D YLD	3.5%	VALUE LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
TIMELINESS 3 Lowered 12/12/14	SAFETY 2 Raised 4/1/05	TECHNICAL 4 Lowered 11/28/14	BETA .75 (1.00 = Market)	High: 20.5 Low: 9.8	22.9 18.1	25.0 21.1	27.2 20.1	28.6 22.8	25.9 16.0	22.3 14.9	25.9 20.6	29.0 22.6	33.0 26.8	35.0 28.6	39.8 31.7	Target Price 2017 2018 2019																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																														
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LLC	17-19	30.86	30.21	33.80	31.20	24.77	20.06	17.02	18.23	18.37	18.09	16.98	17.04	18.34	17.27	17.88	18.48	19.70	19.85	Revenues per sh	20.75	6.35	7.51	6.96	5.32	4.77	3.77	3.12	3.28	3.94	3.77	3.14	3.59	4.24	3.97	4.30	4.41	4.55	4.70	"Cash Flow" per sh	5.10	2.13	1.48	.89	1.50	1.00	1.48	1.17	1.55	1.88	1.84	1.31	1.28	1.80	1.79	2.15	2.27	2.35	2.45	Earnings per sh A	2.90	2.14	2.14	1.44	1.28	1.20	.87	.80	.92	.98	1.08	1.16	1.20	1.24	1.28	1.32	1.36	1.39	1.44	Div'd Decl'd per sh B=C	1.60	2.77	4.09	4.40	3.37	1.89	2.06	2.19	2.45	3.95	7.84	8.65	5.26	4.82	5.55	6.40	6.08	6.50	7.00	Cap'l Spending per sh	8.75	29.40	27.83	27.20	25.97	13.68	14.23	16.13	16.31	17.62	19.14	20.18	20.59	21.25	22.03	22.89	23.88	24.00	25.60	Book Value per sh C	29.65	65.91	67.40	70.08	70.08	71.51	72.84	86.03	86.84	87.39	95.46	108.31	109.07	112.13	125.70	130.00	130.00	130.00	130.00	Common Shs Outst'g E	135.00	18.4	17.2	20.6	--	14.0	10.8	17.4	14.8	12.2	14.1	17.0	14.9	13.0	14.8	13.4	14.0	14.0	14.0	Avg Ann'l P/E Ratio	15.0	.96	.98	1.34	--	.76	.62	.92	.79	.66	.75	1.02	.99	.83	.93	.85	.79	.79	.79	Relative P/E Ratio	.95	5.5%	8.4%	7.9%	5.8%	8.6%	5.5%	3.9%	4.0%	4.3%	4.2%	5.2%	6.3%	5.3%	4.8%	4.6%	4.3%	4.3%	4.3%	Avg Ann'l Div'd Yield	3.7%	CAPITAL STRUCTURE as of 9/30/14																	Total Debt \$3417.8 mill. 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Full Year													Mar.31	Jun.30	Sep.30	Dec.31													2011	481.7	524.9	678.2	486.2	2171.0												2012	475.7	566.3	695.8	523.7	2261.5												2013	546.2	569.6	695.0	559.9	2370.7												2014	628.6	612.7	764.0	554.7	2560												2015	630	620	750	580	2580												<table border="1"> <thead> <tr> <th>Cal-endar</th><th colspan="4">EARNINGS PER SHARE A</th><th>Full Year</th><th colspan="11"></th></tr> <tr> <th></th><th>Mar.31</th><th>Jun.30</th><th>Sep.30</th><th>Dec.31</th><th></th><th colspan="11"></th></tr> </thead> <tbody> <tr> <td>2011</td><td>.27</td><td>.38</td><td>.98</td><td>.16</td><td>1.79</td><td colspan="11"></td></tr> <tr> <td>2012</td><td>.21</td><td>.48</td><td>1.09</td><td>.37</td><td>2.15</td><td colspan="11"></td></tr> <tr> <td>2013</td><td>.40</td><td>.52</td><td>1.04</td><td>.31</td><td>2.27</td><td colspan="11"></td></tr> <tr> <td>2014</td><td>.52</td><td>.40</td><td>1.10</td><td>.33</td><td>2.35</td><td colspan="11"></td></tr> <tr> <td>2015</td><td>.50</td><td>.50</td><td>1.10</td><td>.35</td><td>2.45</td><td colspan="11"></td></tr> </tbody> </table>																	Cal-endar	EARNINGS PER SHARE A				Full Year													Mar.31	Jun.30	Sep.30	Dec.31													2011	.27	.38	.98	.16	1.79												2012	.21	.48	1.09	.37	2.15												2013	.40	.52	1.04	.31	2.27												2014	.52	.40	1.10	.33	2.35												2015	.50	.50	1.10	.35	2.45												<table border="1"> <thead> <tr> <th>Cal-endar</th><th colspan="4">QUARTERLY DIVIDENDS PAID B=C</th><th>Full Year</th><th colspan="11"></th></tr> <tr> <th></th><th>Mar.31</th><th>Jun.30</th><th>Sep.30</th><th>Dec.31</th><th></th><th colspan="11"></th></tr> </thead> <tbody> <tr> <td>2010</td><td>.30</td><td>.31</td><td>.31</td><td>.31</td><td>1.23</td><td colspan="11"></td></tr> <tr> <td>2011</td><td>.31</td><td>.32</td><td>.32</td><td>.32</td><td>1.27</td><td colspan="11"></td></tr> <tr> <td>2012</td><td>.32</td><td>.33</td><td>.33</td><td>.33</td><td>1.31</td><td colspan="11"></td></tr> <tr> <td>2013</td><td>.33</td><td>.34</td><td>.34</td><td>.34</td><td>1.35</td><td colspan="11"></td></tr> <tr> <td>2014</td><td>.34</td><td>.35</td><td>.35</td><td>.35</td><td></td><td colspan="11"></td></tr> </tbody> </table>																	Cal-endar	QUARTERLY DIVIDENDS PAID B=C				Full Year													Mar.31	Jun.30	Sep.30	Dec.31													2010	.30	.31	.31	.31	1.23												2011	.31	.32	.32	.32	1.27												2012	.32	.33	.33	.33	1.31												2013	.33	.34	.34	.34	1.35												2014	.34	.35	.35	.35												
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6.35	7.51	6.96	5.32	4.77	3.77	3.12	3.28	3.94	3.77	3.14	3.59	4.24	3.97	4.30	4.41	4.55	4.70	"Cash Flow" per sh	5.10																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
2.13	1.48	.89	1.50	1.00	1.48	1.17	1.55	1.88	1.84	1.31	1.28	1.80	1.79	2.15	2.27	2.35	2.45	Earnings per sh A	2.90																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
2.14	2.14	1.44	1.28	1.20	.87	.80	.92	.98	1.08	1.16	1.20	1.24	1.28	1.32	1.36	1.39	1.44	Div'd Decl'd per sh B=C	1.60																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
2.77	4.09	4.40	3.37	1.89	2.06	2.19	2.45	3.95	7.84	8.65	5.26	4.82	5.55	6.40	6.08	6.50	7.00	Cap'l Spending per sh	8.75																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
29.40	27.83	27.20	25.97	13.68	14.23	16.13	16.31	17.62	19.14	20.18	20.59	21.25	22.03	22.89	23.88	24.00	25.60	Book Value per sh C	29.65																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
65.91	67.40	70.08	70.08	71.51	72.84	86.03	86.84	87.39	95.46	108.31	109.07	112.13	125.70	130.00	130.00	130.00	130.00	Common Shs Outst'g E	135.00																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
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BUSINESS: Westar Energy, Inc., formerly Western Resources, is the parent of Kansas Gas & Electric Company. Westar supplies electricity to 700,000 customers in Kansas. Electric revenue sources: residential and rural, 34%; commercial, 38%; industrial, 28%. Sold investment in ONEOK in 2003 and 85% ownership in Protection One in 2004. 2013 depreciation rate: 3.8%. Estimated plant age: 15 years. Fuels: coal, 52%; nuclear, 8%; gas, 40%. Has 2,302 employees. BlackRock Inc owns 7.0% of common; The Vanguard Group owns 5.8%; JP Morgan owns 5.2% (3/14 proxy). CEO and Pres.: Mark A. Ruelle. Inc.: Kansas. Addr.: 818 South Kansas Avenue, Topeka, Kansas 66612. Telephone: 785-575-6300. Internet: www.westarenergy.com.

Westar Energy reported third-quarter results that topped our forecasts. The Topeka, Kansas-based company posted earnings of \$1.10 a share, on revenue of \$764 million. Greater profits were driven largely by higher prices and lower operating and maintenance costs at the company's power plants. The electric utility's various investments on transmission infrastructure and air quality control are finally coming to fruition, with additional projects such as the LaCygne air-quality retrofit set to be completed next year. **Meanwhile, going forward, carbon control measures are a cause for concern.** New rules put out by the Environmental Protection Agency (and backed by the current administration), will be tough to comply with in the future. Coal-based generation still represents about 65% of the fuel mix for Westar (as of the third quarter), but the company has worked hard to reduce that figure by about 8% when compared to last year. Importantly, the newly elected Republican Senate will likely put pressure on the government agency to either delay or repeal the new measures, and a compromise could be reached between the two parties at some time. However, as of right now, regulatory risk is still a big problem going forward for the entire industry. **The new year ought to have a number of upcoming catalysts.** Management's guidance, which we believe is conservative, calls for retail sales to climb 150 basis points next year. Retail sales have risen roughly 3% through the first nine months of 2014. Moreover, operating and maintenance costs, as well as SG&A expenses, should continue to trend lower, as Westar focuses on keeping its overhead in check. Finally, management pointed to price increases in transmission and environmental cost recovery, which was approved by regulators, thereby allowing the utility to raise rates on certain residents in order to cover much of its environmental regulation outlay. **Utilities have done well this year, and Westar Energy is no exception.** The stock has good marks for both Price Stability (100) and Safety (2), and would be a fine choice for investors in need of some income. *Daniel Henigson December 19, 2014*

(A) EPS diluted from 2010 onward. Excl. non-recur. gains (losses): '98, (\$1.45); '99, (\$1.31); '00, \$1.07; '01, 27¢; '02, (\$12.06); '03, 77¢; '08, 39¢; '11, 14¢. Earnings may not sum due to rounding. Next egs. rept due early February. (B) Divs paid in early Jan., April, July, and Oct. = Div'd reinvest. plan avail. † Shareholder invest. plan avail. (C) Incl. reg. assets. In 2013: \$4.92/sh. (D) Rate base determined: fair value; Rate allowed on common equity in '13: 10.0%; earned on avg. com. eq., '13: 9.5%. Regul. Clim.: Avg. (E) In mill.

Company's Financial Strength B++
Stock's Price Stability 100
Price Growth Persistence 65
Earnings Predictability 80

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WISCONSIN ENERGY NYSE-WEC				RECENT PRICE	PIE RATIO 20.5 (Trailing: 19.0 Median: 15.0)								RELATIVE PIE RATIO	DIV'D YLD	VALUE LINE																																							
TIMELINESS 3 Lowered 9/19/14 SAFETY 1 Raised 3/23/12 TECHNICAL 4 Raised 12/12/14 BETA .65 (1.00 = Market)				High: 16.8 Low: 11.3	17.3 14.8	20.4 16.7	24.3 19.1	25.2 20.5	24.8 17.4	25.3 18.2	30.5 23.4	35.4 27.0	41.5 33.6	45.0 37.0	51.4 40.2	Target Price Range 2017 2018 2019																																						
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231.21	237.81	237.29	230.84	232.06	236.85	233.97	233.96	233.94	233.89	233.84	233.82	233.77	230.49	229.04	225.96	225.50	225.50	Common Shs Outst'g ^D	220.00																																			
18.0	13.3	18.7	12.1	10.5	12.4	17.5	14.5	16.0	16.5	14.8	13.3	14.0	14.2	15.8	16.5	Bold figures are Value Line estimates		Avg Ann'l P/E Ratio	14.5																																			
.94	.76	1.22	.62	.57	.71	.92	.77	.86	.88	.89	.89	.89	.89	1.01	.93			Relative P/E Ratio	.90																																			
5.2%	6.3%	6.8%	3.6%	3.3%	2.8%	2.6%	2.4%	2.2%	2.1%	2.4%	3.2%	3.0%	3.3%	3.2%	3.5%			Avg Ann'l Div'd Yield	4.5%																																			
CAPITAL STRUCTURE as of 9/30/14				Total Debt \$5093.1 mill. Due in 5 Yrs \$1625.5 mill. LT Debt \$4569.6 mill. LT Interest \$251.3 mill. Incl. \$84.5 mill. capitalized leases. (LT interest earned: 5.0x) Leases, Uncapitalized Annual rentals \$3.9 mill. Pension Assets-12/13 \$1451.0 mill. Oblig. \$1410.2 mill. Pfd Stock \$30.4 mill. Pfd Div'd \$1.2 mill. 260,000 shs. 3.60%, \$100 par, callable at \$101; 44,498 shs. 6%, \$100 par. Common Stock 225,517,341 shs.																																																		
				3431.1	3815.5	3996.4	4237.8	4431.0	4127.9	4202.5	4486.4	4246.4	4519.0	5000	5000	5000	5000	5000	Revenues (\$mill)	5600																																		
				221.2	304.8	313.7	337.7	359.8	378.4	455.6	514.0	547.5	578.6	595	610	610	610	610	Net Profit (\$mill)	730																																		
				37.5%	32.9%	35.8%	39.1%	37.6%	36.5%	35.4%	33.9%	35.9%	36.9%	38.0%	38.0%	38.0%	38.0%	38.0%	Income Tax Rate	38.0%																																		
				10.0%	12.5%	19.0%	23.8%	27.2%	25.0%	18.6%	16.8%	9.4%	4.5%	6.0%	6.0%	6.0%	6.0%	6.0%	AFUDC % to Net Profit	5.0%																																		
				56.2%	52.8%	51.3%	50.3%	54.8%	51.9%	50.6%	53.6%	51.7%	50.6%	48.5%	49.5%	49.5%	49.5%	49.5%	Long-Term Debt Ratio	49.0%																																		
				43.3%	46.7%	48.2%	49.2%	44.8%	47.7%	49.0%	46.0%	48.0%	49.1%	51.0%	50.5%	50.5%	50.5%	50.5%	Common Equity Ratio	50.5%																																		
				5762.3	5741.5	5992.8	6302.1	7442.0	7473.1	7764.5	8608.0	8619.3	8626.6	8650	9245	9245	9245	9245	Total Capital (\$mill)	9400																																		
				5903.1	6362.9	7052.5	7681.2	8517.0	9070.5	9601.5	10160	10572	10907	11225	11625	11625	11625	11625	Net Plant (\$mill)	12575																																		
				5.6%	7.0%	6.6%	7.0%	6.3%	6.4%	7.5%	7.5%	7.9%	8.1%	8.0%	8.0%	8.0%	8.0%	8.0%	Return on Total Cap'l	9.0%																																		
				8.8%	11.2%	10.7%	10.8%	10.7%	10.5%	11.9%	12.9%	13.1%	13.6%	13.5%	13.0%	13.0%	13.0%	13.0%	Return on Shr. Equity	15.0%																																		
				8.8%	11.3%	10.8%	10.9%	10.7%	10.6%	12.0%	12.9%	13.2%	13.6%	13.5%	13.0%	13.0%	13.0%	13.0%	Return on Com Eq ^E	15.5%																																		
				4.9%	7.5%	7.1%	7.1%	7.0%	6.2%	7.0%	6.8%	6.5%	5.9%	5.5%	5.0%	5.0%	5.0%	5.0%	Retained to Com Eq	5.5%																																		
				45%	34%	35%	35%	35%	42%	41%	47%	51%	57%	59%	63%	63%	63%	63%	All Div'ds to Net Prof	64%																																		
MARKET CAP: \$11 billion (Large Cap)				BUSINESS: Wisconsin Energy Corporation is a holding company for We Energies, which provides electric, gas & steam service in Wisconsin. Customers: 1.1 mill. elec., 1.1 mill. gas. Acq'd WICOR 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 & industrial, 22%; other, 10%. Generating sources: coal, 54%; gas, 10%; renewables, 3%; purchased, 33%. Fuel costs: 40% of revs. '13 reported deprec. rate (utility): 2.9%. Has 4,300 employees. 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.																																																		
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(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¢. '11

EPS don't add due to rounding. Next earnings report due early Feb. (B) Div'ds historically paid in early Mar., June, Sept. & Dec. Div'd reinvestment plan avail. (C) Incl. intang. In '13: \$6.86/sh. (D) In mill., adj. for split. (E) Rate base: Net orig. cost. Rates all'd on com. eq. in WI in '13: 10.4%-10.5%; earned on avg. com. eq., '13: 13.6%. Regulat. Climate: Above Avg.

Company's Financial Strength A+
 Stock's Price Stability 100
 Price Growth Persistence 90
 Earnings Predictability 100

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**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 210

**Moody's Investor Services
Sector In-Depth – U.S. Regulated Utilities**

**Exhibits in Support
of Opening Testimony**

June 15, 2015

SECTOR IN-DEPTH

10 MARCH 2015

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US Regulated Utilities

Lower Authorized Equity Returns Will Not Hurt Near-Term Credit Profiles

The credit profiles of US regulated utilities will remain intact over the next few years despite our expectation that regulators will continue to trim the sector's profitability by lowering its authorized returns on equity (ROE). Persistently low interest rates and a comprehensive suite of cost recovery mechanisms ensure a low business risk profile for utilities, prompting regulators to scrutinise their profitability, which is defined as the ratio of net income to book equity. We view cash flow measures as a more important rating driver than authorized ROEs, and we note that regulators can lower authorized ROEs without hurting cash flow, for instance by targeting depreciation, or through special rate structures. Regulators can also adjust a utility's equity capitalization in its rate base. All else being equal, we think most utilities would prefer a thicker equity base and a lower authorized ROE over a small equity layer and a high authorized ROE.

- » **More timely cost recovery helps offset falling ROEs.** Regulators continue to permit a robust suite of mechanisms that enable utilities to recoup prudently incurred operating costs, including capital investments such as environment related or infrastructure hardening expenditures. Strong cost recovery is credit positive because it ensures a stable financial profile. Despite lower authorized ROEs, we see the sector maintaining a ratio of Funds From Operations (FFO) to debt near 20%, a level that continues to support strong investment-grade ratings.
- » **Utilities' cash flow is somewhat insulated from lower ROEs.** Net income represents about 30% - 40% of utilities' cash flow, so lower authorized returns won't necessarily affect cash flow or key financial credit ratios, especially when the denominator (equity) is rising. Regulators set the equity layer when capitalizing rate base, and the equity layer multiplied by the authorized ROE drives the annual revenue requirements. Across the sector, the ratio of equity to total assets has remained flat in the 30% range since 2007.
- » **Utilities' actual financial performance remains stable.** Earned ROEs, which typically lag authorized ROEs, have not fallen as much as authorized returns in recent years. Since 2007, vertically integrated utilities, transmission and distribution only utilities, and natural gas local distribution companies have maintained steady earned ROE's in the 9% - 10% range. Holding companies with primarily regulated businesses also earned ROEs of around 9% - 10%, while returns for holding companies with diversified operations, namely unregulated generation, have fallen from 11% (over the past seven year average) to around 9% today.

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Muldoon/2

Robust Suite of Cost Recovery Mechanisms Is Credit Positive

Over the past few years, the US regulatory environment has been very supportive of utilities. We think this is partly because regulators acknowledge that utility infrastructure needs a material amount of ongoing investment for maintenance, refurbishment and renovation. Utilities have also been able to garner support from both politicians and regulators for prudent investment in these critical assets because it helps create jobs, spurring economic growth. We also think regulators prefer to regulate financially healthy utilities.

Across the US, we continue to see regulators approving mechanisms that allow for more timely recovery of costs, a material credit positive. These mechanisms, which keep utilities' business risk profile low compared to most industrial corporate sectors, include: formulaic rate structures, special purpose trackers or riders; decoupling programs (which delink volumes from revenue); the use of future test years or other pre-approval arrangements. We also see a sustained increase in the frequency of rate case filings.

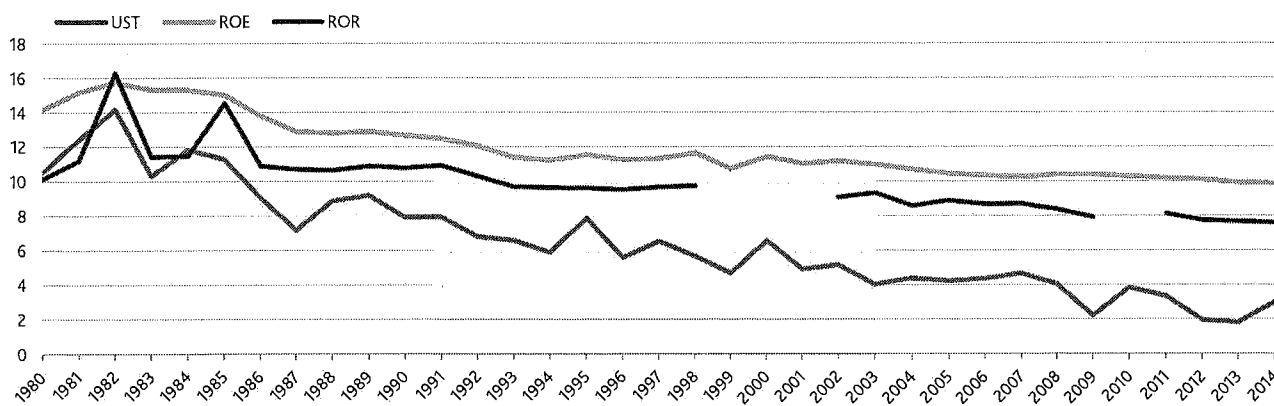
A supportive regulatory environment translates into a more transparent and stable financial profile, which in turn results in reasonably unfettered access to capital markets - for both debt and equity. Today, we think utilities enjoy an attractive set of market conditions that will remain in place over the next few years. By themselves, neither a slow (but steady) decline in authorized profitability, nor a material revision in equity market valuation multiples, will derail the stable credit profile of US regulated utilities.

Cost recovery will help offset falling ROEs

Robust cost recovery mechanisms will help ensure that US regulated utilities' credit quality remains intact over the next few years. As a result, falling authorized ROEs are not a material credit driver at this time, but rather reflect regulators' struggle to justify the cost of capital gap between the industry's authorized ROEs and persistently low interest rates. We also see utilities struggling to defend this gap, while at the same time recovering the vast majority of their costs and investments through a variety of rate mechanisms.

In the table below, we show the US Treasury 10-year yield, which has steadily fallen from the 5% range in the summer of 2007 to the 2% range today. US utilities benefit from these lower interest rates because they borrow approximately \$50 billion a year. For some utilities, a lower cost of debt translates directly into a higher return on equity, as long as their rate structure includes an embedded weighted average cost of capital (and the utilities can stay out of a general rate case proceeding).

Exhibit 1
Regulators hold up their end of the bargain by limiting reduction in return on equity (ROE) and overall rate of return (ROR) when compared with the decline in US Treasury 10-year yields



SOURCE: SNL Financial, LP, Moody's

This publication does not announce a credit rating action. For any credit ratings referenced in this publication, please see the ratings tab on the issuer/entity page on www.moody.com for the most updated credit rating action information and rating history.

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As utilities increasingly secure more up-front assurance for cost recovery in their rate proceedings, we think regulators will increasingly view the sector as less risky. The combination of low capital costs, high equity market valuation multiples (which are better than or on par with the broader market despite the regulated utilities' low risk profile), and a transparent assurance of cost recovery tend to support the case for lower authorized returns, although because utilities will argue they should rise, or at least stay unchanged.

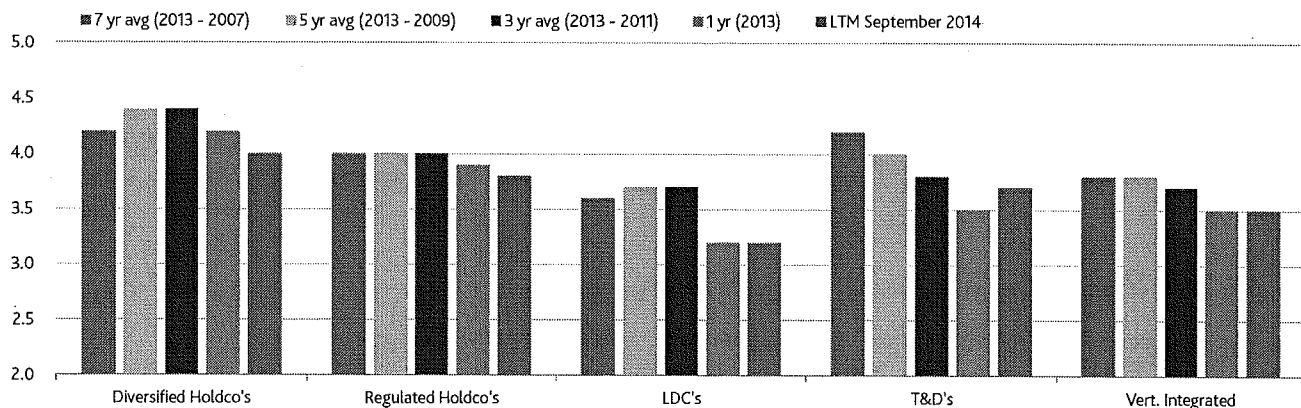
One of the arguments for keeping authorized ROEs steady is that lowering them would make utilities less attractive to providers of capital. Utility holding companies assert that they would rather invest in higher risk-adjusted opportunities than in a regulated utility with sub-par return prospects. We see a risk that this argument could lead to a more contentious regulatory environment, a material credit negative. We do not think this scenario will develop over the next few years.

Our default and recovery data provides strong evidence that regulated utilities are indeed less risky (from the perspective of a probability of default and expected loss given default, as defined by Moody's) than their non-financial corporate peers. On a global basis, we nonetheless see a material amount of capital looking for regulated utility investment opportunities, and the same is true in the US despite, despite a lower authorized return. This is partly because investors can use holding company leverage to increase their actual equity returns, by borrowing capital at today's low interest rates and investing in the equity of a regulated utility.

Despite the reduction in authorized ROEs, US utilities are thankful to their regulators for the robust suite of timely cost recovery mechanisms which allow them to recoup prudently incurred operating costs such as fuel, as well as some investment expenses. These recovery mechanisms drive a stable and transparent dividend policy, which translates into historically very high equity multiples. Moreover, cost recovery helps keep the sector's overall financial profile stable, thereby supporting strong investment-grade ratings.

Exhibit 2

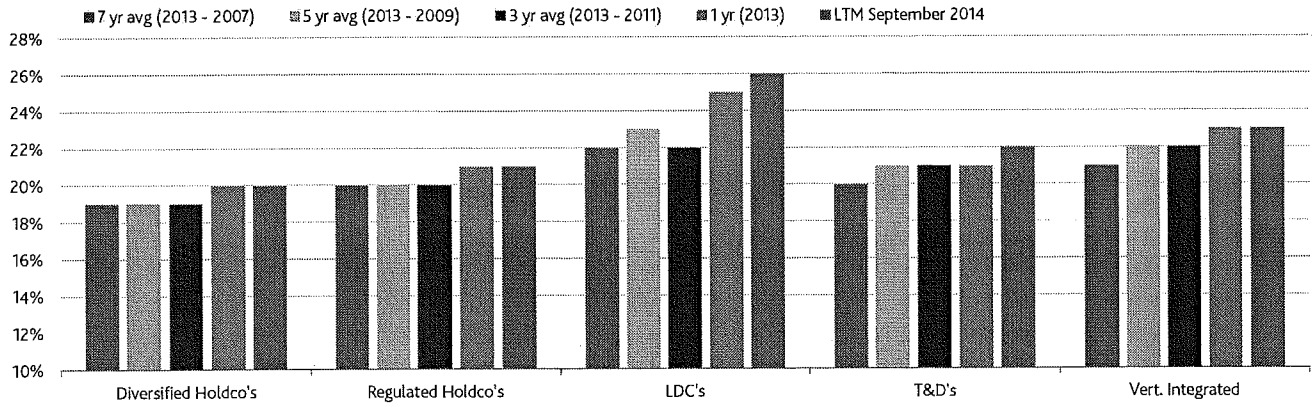
With better recovery mechanisms, the ratio of debt-to-EBITDA can rise, modestly, without negatively impacting credit profiles



SOURCE: Company filings; Moody's

Exhibit 3

The ratio of Funds From Operations to debt is rising, a material credit positive, but the rise is partly funded by bonus depreciation and deferred taxes, which will eventually reverse



SOURCE: Company filings; Moody's

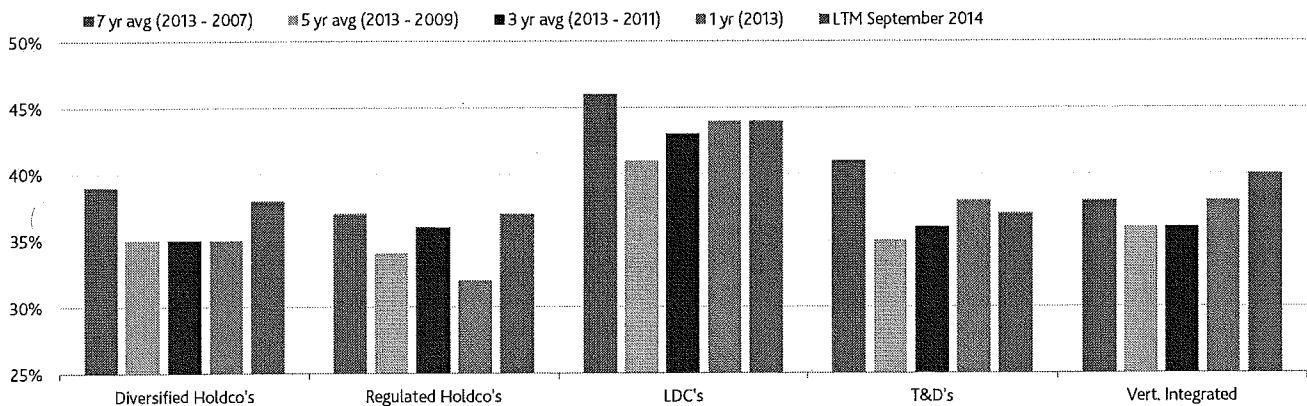
Utilities' cash flow is somewhat insulated from declining ROEs

Across all our utility group sub-sectors (see Appendix), net income - the numerator in the calculation of ROE - accounts for between 30% - 40% of cash flow. While net income is important, cash flow exerts a much greater influence over creditworthiness. This is primarily because cash flow takes into account depreciation and amortization expenses, along with other deferred tax adjustments. We note that deferred taxes have risen over the past few years, in part due to bonus depreciation elections, which will eventually reverse. From a credit perspective, there is a difference between the nominal amount of net income, which goes into cash flow, and the relationship of net income to book equity (a measure of profitability).

In the chart below, we highlight the ratio of net income to cash flow from operations (CFO) for our selected peer groups. Across all of the sectors, the longer term historical average of net income to CFO has fallen compared with the late 2000s, but has been rising over the more recent past. This is partly a function of deferred taxes, which have become a larger component of CFO over the past decade.

Exhibit 4

Net income as a % of cash flow from operations has been steadily rising (since 2011)



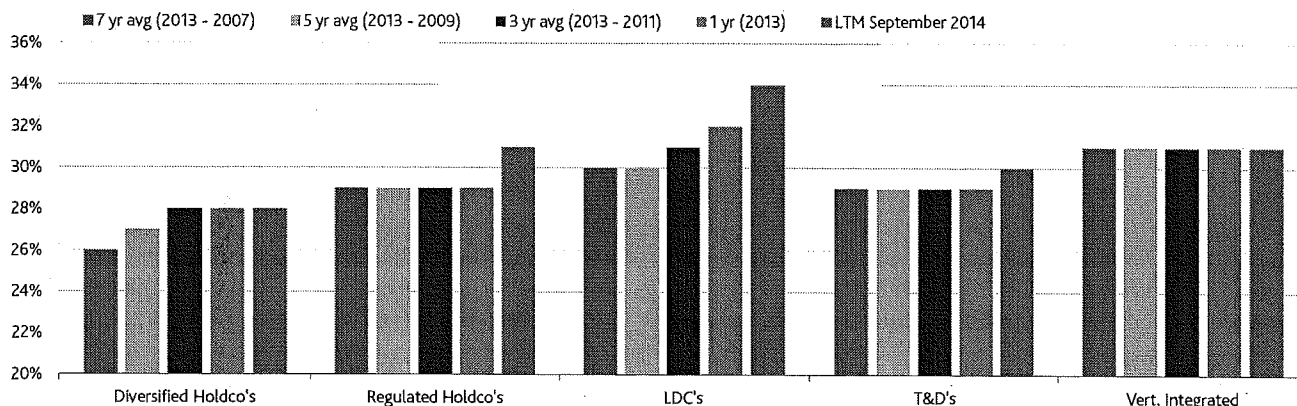
SOURCE: Company filings; Moody's

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We can also envisage scenarios where regulators seek to achieve a reduction in authorized ROEs without harming credit profiles by focusing on utilities' equity layer. In the chart below, we illustrate median equity as a percentage of total assets for our selected peer groups. In our illustration, utilities will benefit from acquisition related goodwill on one hand, and impairments on the other.

Exhibit 5

Equity as a % of total assets, not capitalization, includes both goodwill and impairments



SOURCE: Company filings; Moody's

Utilities' actual financial performance remains stable

Earned ROE's, as reported by utilities and adjusted by Moody's, have been relatively flat over the past few years, despite the decline in authorized ROEs. This means utilities are closer to earning their authorized equity returns, which is positive from an equity market valuation perspective.

The authorized ROE is a popular focal point in many regulatory rate case proceedings. In addition, many regulatory jurisdictions look to established precedents that rely on various methodologies to determine an appropriate ROE, such as the capital asset pricing model or discounted cash flow analysis. In some jurisdictions where formulaic based rate structures point to lower ROEs for a longer projected period of time, regulators are incorporating a view that today's interest rate environment is "artificially" being held low.

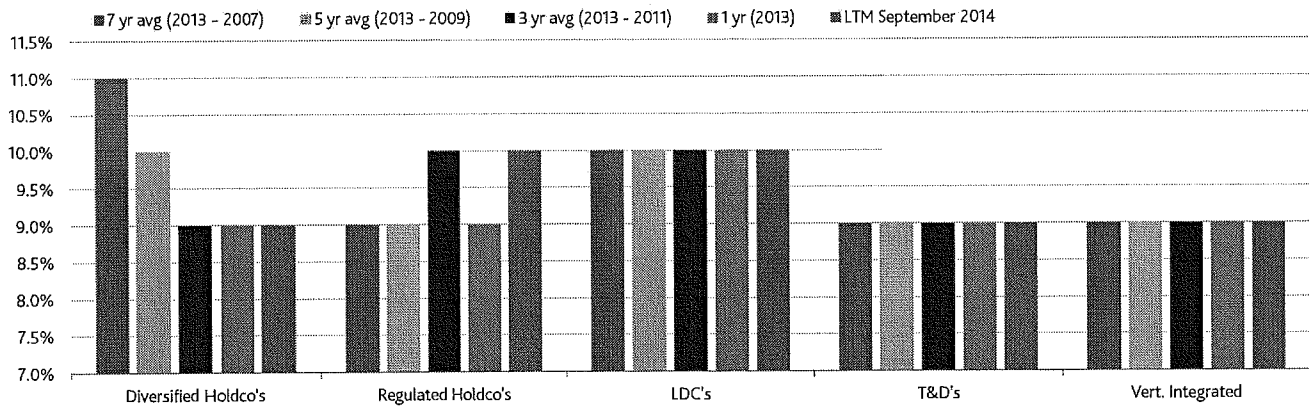
Regardless, we think interest rates will go up, eventually. When they do, we also think authorized ROEs will trend up as well. However, just as authorized ROEs declined in a lagging fashion when compared to falling interest rates, we expect authorized ROEs to rise in a lagging fashion when interest rates rise.

Depending on alternative sources of risk-adjusted capital investment opportunities, this could spell trouble for utilities. For now, utilities can enjoy their (historically) high equity valuations, in terms of dividend yield and price-earnings ratios.

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Exhibit 6

GAAP adjusted earned ROE's are relatively flat across all sub-sectors except Holding Companies with Diversified Operations, while the lower-risk LDC sector is outperforming



NOTE: GAAP adjusted ROE, not regulated ROE, does not adjust for goodwill or impairments.

Source: Company filings; Moody's

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Appendix

Exhibit 7

Utilities with the highest earned ROEs (ranked by 7-year average)

Company Name	Sector	Rating	1-year average (2013) ROE	3-year average (2013 - 2011) ROE	5-year average (2013 - 2009) ROE	7-year average (2013 - 2007) ROE
CenterPoint Energy Houston Electric, LLC	T&D	A3	33%	32%	25%	23%
Questar Corporation	Holdco - Primarily Regulated	A2	14%	18%	20%	20%
AEP Texas Central Company	T&D	Baa1	14%	28%	22%	20%
Exelon Corporation	Holdco - Diversified	Baa2	7%	10%	14%	17%
CenterPoint Energy, Inc.	Holdco - Primarily Regulated	Baa1	7%	16%	15%	17%
Ohio Edison Company	T&D	Baa1	23%	18%	17%	16%
Public Service Enterprise Group	Holdco - Diversified	Baa2	11%	12%	14%	15%
Dayton Power & Light Company	T&D	Baa3	7%	9%	13%	15%
Dominion Resources Inc.	Holdco - Diversified	Baa2	13%	9%	12%	15%
Southern California Gas Company	LDC	A1	14%	13%	14%	15%
PECO Energy Company	T&D	A2	12%	12%	12%	14%
PPL Corporation	Holdco - Diversified	Baa3	9%	12%	11%	14%
UGI Utilities, Inc.	LDC	A2	15%	13%	13%	13%
Entergy Corporation	Holdco - Diversified	Baa3	7%	11%	12%	13%
Cleco Corporation	Holdco - Primarily Regulated	Baa1	10%	12%	13%	13%
Alabama Gas Corporation	LDC	A2	4%	11%	12%	13%
Entergy New Orleans, Inc.	Vertically Integrated Utility	Ba2	5%	10%	11%	12%
Entergy Gulf States Louisiana, LLC	Vertically Integrated Utility	Baa1	11%	13%	12%	12%
Piedmont Natural Gas Company, Inc.	LDC	A2	11%	11%	12%	12%
Ohio Power Company	T&D	Baa1	25%	14%	13%	12%
Southern Company (The)	Holdco - Primarily Regulated	Baa1	9%	11%	11%	12%
Georgia Power Company	Vertically Integrated Utility	A3	12%	12%	12%	12%
Alabama Power Company	Vertically Integrated Utility	A1	12%	12%	12%	12%
Southern California Edison Company	Vertically Integrated Utility	A2	8%	12%	12%	12%
NextEra Energy, Inc.	Holdco - Diversified	Baa1	10%	11%	11%	12%
Wisconsin Energy Corporation	Holdco - Primarily Regulated	A2	13%	13%	12%	12%
West Penn Power Company	T&D	Baa1	17%	13%	12%	12%
San Diego Gas & Electric Company	Vertically Integrated Utility	A1	9%	10%	11%	12%
Interstate Power and Light Company	Vertically Integrated Utility	A3	10%	9%	9%	12%

NOTE: GAAP adjusted ROE, not regulated ROE, does not adjust for goodwill or impairments.

SOURCE: Moody's; company filings

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Exhibit 8

Highest (over 30%) and lowest (less than 20%) equity level as a % of total assets (ranked by 7-year average) [NOTE: Book equity is not adjusted for goodwill or impairments]

Company Name	Sector	Rating	1-year average (2013)	3-year average (2013 - 2011)	5-year average (2013 - 2009)	7-year average (2013 - 2007)
Duke Energy Ohio, Inc.	T&D	Baa1	48%	47%	48%	50%
Yankee Gas Services Company	LDC	Baa1	41%	42%	43%	43%
Texas-New Mexico Power Company	T&D	Baa1	43%	43%	43%	43%
Oncor Electric Delivery Company LLC	T&D	Baa1	40%	41%	41%	43%
Dayton Power & Light Company	T&D	Baa3	37%	38%	39%	40%
Pennsylvania Power Company	T&D	Baa1	25%	30%	34%	40%
Black Hills Power, Inc.	Vertically Integrated Utility	A3	38%	38%	37%	38%
ALLETE, Inc.	Vertically Integrated Utility	A3	38%	37%	37%	38%
Central Maine Power Company	T&D	A3	39%	38%	38%	38%
MGE Energy, Inc.	Holdco - Primarily Regulated	NR	39%	37%	38%	38%
Duke Energy Corporation	Holdco - Primarily Regulated	A3	36%	36%	37%	38%
Jersey Central Power & Light Company	T&D	Baa2	32%	33%	36%	38%
Oklahoma Gas & Electric Company	Vertically Integrated Utility	A1	36%	37%	37%	37%
Public Service Company of Colorado	Vertically Integrated Utility	A3	37%	37%	37%	37%
Virginia Electric and Power Company	Vertically Integrated Utility	A2	37%	37%	37%	35%
Wisconsin Public Service Corporation	Vertically Integrated Utility	A1	34%	34%	34%	35%
PacifiCorp	Vertically Integrated Utility	A3	36%	35%	35%	35%
UGI Utilities, Inc.	LDC	A2	35%	34%	34%	34%
Cleco Corporation	Holdco - Primarily Regulated	Baa1	37%	36%	34%	34%
Empire District Electric Company (The)	Vertically Integrated Utility	Baa1	35%	34%	34%	34%
Great Plains Energy Incorporated	Holdco - Primarily Regulated	Baa2	35%	35%	34%	34%
Nevada Power Company	Vertically Integrated Utility	Baa1	32%	33%	33%	33%
Tampa Electric Company	Vertically Integrated Utility	A2	34%	33%	33%	33%
Wisconsin Power and Light Company	Vertically Integrated Utility	A1	34%	33%	32%	33%
Questar Corporation	Holdco - Primarily Regulated	A2	29%	28%	31%	33%
Duke Energy Kentucky, Inc.	Vertically Integrated Utility	Baa1	31%	30%	33%	33%
Florida Power & Light Company	Vertically Integrated Utility	A1	36%	35%	34%	33%
Alabama Gas Corporation	LDC	A2	59%	40%	35%	33%
El Paso Electric Company	Vertically Integrated Utility	Baa1	34%	32%	32%	33%
IDACORP, Inc.	Holdco - Primarily Regulated	Baa1	34%	33%	33%	33%
PPL Electric Utilities Corporation	Vertically Integrated Utility	Baa1	34%	34%	34%	33%
Commonwealth Edison Company	T&D	Baa1	31%	32%	32%	33%
Georgia Power Company	Vertically Integrated Utility	A3	33%	33%	33%	33%
CMS Energy Corporation	Holdco - Primarily Regulated	Baa2	20%	19%	18%	18%
Hawaiian Electric Industries, Inc.	Holdco - Diversified		17%	16%	16%	16%
CenterPoint Energy, Inc.	Holdco - Primarily Regulated	Baa1	20%	19%	17%	15%
CenterPoint Energy Houston Electric, LLCT&D		A3	9%	15%	15%	15%
AEP Texas Central Company	T&D	Baa1	13%	15%	14%	13%

SOURCE: Moody's; company filings

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Exhibit 9

Highest (over 30%) and lowest (less than 15%) ratio of FFO to debt (ranked by 7-year average)

Company Name	Sector	Rating	1-year average (2013)	3-year average (2013 - 2011)	5-year average (2013 - 2009)	7-year average (2013 - 2007)
Dayton Power & Light Company	T&D	Baa3	32%	34%	42%	42%
Questar Corporation	Holdco - Primarily Regulated	A2	29%	30%	31%	42%
Pennsylvania Power Company	T&D	Baa1	30%	34%	32%	37%
Exelon Corporation	Holdco - Diversified	Baa2	28%	34%	37%	37%
Alabama Gas Corporation	LDC	A2	23%	27%	32%	36%
Florida Power & Light Company	Vertically Integrated Utility	A1	34%	35%	35%	35%
Southern California Gas Company	LDC	A1	42%	37%	35%	34%
Southern California Edison Company	Vertically Integrated Utility	A2	32%	33%	35%	32%
Madison Gas and Electric Company	Vertically Integrated Utility	A1	39%	35%	34%	31%
PECO Energy Company	T&D	A2	29%	31%	33%	31%
Dominion Resources Inc.	Holdco - Diversified	Baa2	16%	17%	16%	14%
Entergy Texas, Inc.	Vertically Integrated Utility	Baa3	15%	14%	12%	14%
Monongahela Power Company	T&D	Baa2	13%	16%	15%	14%
CMS Energy Corporation	Holdco - Primarily Regulated	Baa2	18%	16%	15%	14%
Appalachian Power Company	Vertically Integrated Utility	Baa1	15%	13%	14%	14%
Pennsylvania Electric Company	T&D	Baa2	15%	14%	12%	13%
NiSource Inc.	Holdco - Diversified	Baa2	15%	14%	14%	13%
Puget Energy, Inc.	Vertically Integrated Utility	Baa3	14%	12%	12%	13%
Toledo Edison Company	T&D	Baa3	10%	10%	8%	13%
Cleveland Electric Illuminating Company	T&D	Baa3	11%	11%	12%	13%
AEP Texas Central Company	T&D	Baa1	14%	15%	13%	12%

SOURCE: Moody's; company filings

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Exhibit 10

Highest (over 4.5x) and lowest (less than 3.0x) ratio of debt to EBITDA (ranked by 1-year average, 2013, to focus on more recent performance)

Company Name	Sector	Rating	1-year average (2013)	3-year average (2013 - 2011)	5-year average (2013 - 2009)	7-year average (2013 - 2007)
Berkshire Hathaway Energy Company	Holdco - Diversified	A3	7.1	5.8	5.6	5.3
FirstEnergy Corp.	Holdco - Diversified	Baa3	6.0	5.2	4.8	4.4
Wisconsin Electric Power Company	Vertically Integrated Utility	A1	5.9	6.1	5.6	5.0
Entergy Texas, Inc.	Vertically Integrated Utility	Baa3	5.8	6.1	6.2	6.1
Monongahela Power Company	T&D	Baa2	5.6	5.2	5.7	6.0
NiSource Inc.	Holdco - Diversified	Baa2	5.2	5.5	5.4	5.5
PPL Corporation	Holdco - Diversified	Baa3	5.1	4.9	5.1	4.6
Appalachian Power Company	Vertically Integrated Utility	Baa1	5.0	5.0	5.2	5.4
Progress Energy, Inc.	Holdco - Primarily Regulated	Baa1	4.9	5.6	5.1	4.9
Puget Energy, Inc.	Vertically Integrated Utility	Baa3	4.9	5.6	5.9	5.6
Cleveland Electric Illuminating Company	T&D	Baa3	4.9	5.2	4.7	4.2
Northwest Natural Gas Company	LDC	A3	4.8	4.8	4.5	4.2
Jersey Central Power & Light Company	T&D	Baa2	4.7	5.5	4.2	3.6
NorthWestern Corporation	Vertically Integrated Utility	A3	4.7	4.5	4.4	4.3
Pepco Holdings, Inc.	Holdco - Primarily Regulated	Baa3	4.7	5.1	5.2	5.2
Laclede Gas Company	LDC	A3	4.7	5.5	5.3	5.6
Atlantic City Electric Company	T&D	Baa2	4.7	4.9	4.8	4.7
Nevada Power Company	Vertically Integrated Utility	Baa1	4.6	4.6	4.9	5.0
Black Hills Power, Inc.	Vertically Integrated Utility	A3	2.9	3.2	3.8	3.6
Virginia Electric and Power Company	Vertically Integrated Utility	A2	2.9	3.1	3.4	3.4
Duke Energy Kentucky, Inc.	Vertically Integrated Utility	Baa1	2.9	3.3	3.3	3.4
Texas-New Mexico Power Company	T&D	Baa1	2.9	2.9	3.2	3.3
Oklahoma Gas & Electric Company	Vertically Integrated Utility	A1	2.9	2.9	2.9	3.0
Cleco Power LLC	Vertically Integrated Utility	A3	2.9	3.2	3.6	3.7
Consumers Energy Company	Vertically Integrated Utility	A1	2.9	3.1	3.3	3.5
Alabama Power Company	Vertically Integrated Utility	A1	2.8	2.9	3.0	3.1
Public Service Electric and Gas Company	T&D	A2	2.8	3.0	3.2	3.3
Alabama Gas Corporation	LDC	A2	2.8	2.7	2.5	2.4
Pinnacle West Capital Corporation	Holdco - Primarily Regulated	Baa1	2.8	3.1	3.3	3.6
Cleco Corporation	Holdco - Primarily Regulated	Baa1	2.8	2.9	3.4	3.6
PECO Energy Company	T&D	A2	2.8	3.0	2.6	2.6
Northern States Power Company (Wisconsin)	Vertically Integrated Utility	A2	2.8	2.9	2.8	2.8
Duke Energy Carolinas, LLC	Vertically Integrated Utility	A1	2.8	3.1	3.2	3.1
UGI Utilities, Inc.	LDC	A2	2.7	3.0	3.1	3.3
Exelon Corporation	Holdco - Diversified	Baa2	2.7	2.8	2.5	2.5
West Penn Power Company	T&D	Baa1	2.7	3.3	3.3	3.4
Questar Corporation	Holdco - Primarily Regulated	A2	2.7	2.8	2.7	2.3
Tampa Electric Company	Vertically Integrated Utility	A2	2.6	2.7	2.8	2.9
Arizona Public Service Company	Vertically Integrated Utility	A3	2.6	2.9	3.1	3.3
New York State Electric and Gas Corporation	T&D	A3	2.6	2.9	3.2	4.3
Dayton Power & Light Company	T&D	Baa3	2.5	2.2	2.0	1.9
Florida Power & Light Company	Vertically Integrated Utility	A1	2.4	2.7	2.6	2.6
Ohio Power Company	T&D	Baa1	2.4	2.8	3.1	3.3
Madison Gas and Electric Company	Vertically Integrated Utility	A1	2.4	2.8	2.8	2.9
Pennsylvania Power Company	T&D	Baa1	2.4	2.3	2.4	2.2
MGE Energy, Inc.	Holdco - Primarily Regulated	NR	2.3	2.7	2.9	3.1
Rochester Gas & Electric Corporation	T&D	Baa1	2.3	2.9	3.0	3.5
Public Service Enterprise Group Incorporated	Holdco - Diversified	Baa2	2.3	2.3	2.3	2.4
NSTAR Electric Company	T&D	A2	2.2	2.6	2.7	2.8
Southern California Gas Company	LDC	A1	2.2	2.5	2.4	2.5
Mississippi Power Company	Vertically Integrated Utility	Baa1	(3.2)	3.5	3.4	3.1

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Exhibit 11

List of Companies (NOTE: in our appendix tables, we exclude utilities with private ratings)

Company Name	Sector	Rating
Berkshire Hathaway Energy Company	Holdco - Diversified	A3
Black Hills Corporation	Holdco - Diversified	Baa1
Dominion Resources Inc.	Holdco - Diversified	Baa2
DTE Energy Company	Holdco - Diversified	A3
Entergy Corporation	Holdco - Diversified	Baa3
Exelon Corporation	Holdco - Diversified	Baa2
FirstEnergy Corp.	Holdco - Diversified	Baa3
Hawaiian Electric Industries, Inc.	Holdco - Diversified	NR
Integrus Energy Group, Inc.	Holdco - Diversified	A3
NextEra Energy, Inc.	Holdco - Diversified	Baa1
NiSource Inc.	Holdco - Diversified	Baa2
PPL Corporation	Holdco - Diversified	Baa3
Public Service Enterprise Group Incorporated	Holdco - Diversified	Baa2
Sempra Energy	Holdco - Diversified	Baa1
Alliant Energy Corporation	Holdco - Primarily Regulated	A3
Ameren Corporation	Holdco - Primarily Regulated	Baa2
American Electric Power Company, Inc.	Holdco - Primarily Regulated	Baa1
CenterPoint Energy, Inc.	Holdco - Primarily Regulated	Baa1
Cleco Corporation	Holdco - Primarily Regulated	Baa1
CMS Energy Corporation	Holdco - Primarily Regulated	Baa2
Consolidated Edison, Inc.	Holdco - Primarily Regulated	A3
Duke Energy Corporation	Holdco - Primarily Regulated	A3
Edison International	Holdco - Primarily Regulated	A3
Great Plains Energy Incorporated	Holdco - Primarily Regulated	Baa2
IDACORP, Inc.	Holdco - Primarily Regulated	Baa1
MGE Energy, Inc.	Holdco - Primarily Regulated	NR
Northeast Utilities	Holdco - Primarily Regulated	Baa1
Pepco Holdings, Inc.	Holdco - Primarily Regulated	Baa3
PG&E Corporation	Holdco - Primarily Regulated	Baa1
Pinnacle West Capital Corporation	Holdco - Primarily Regulated	Baa1
PNM Resources, Inc.	Holdco - Primarily Regulated	Baa3
Progress Energy, Inc.	Holdco - Primarily Regulated	Baa1
Questar Corporation	Holdco - Primarily Regulated	A2
SCANA Corporation	Holdco - Primarily Regulated	Baa3
Southern Company (The)	Holdco - Primarily Regulated	Baa1
Wisconsin Energy Corporation	Holdco - Primarily Regulated	A2
Xcel Energy Inc.	Holdco - Primarily Regulated	A3
Alabama Gas Corporation	LDC	A2
Atmos Energy Corporation	LDC	A2
DTE Gas Company	LDC	Aa3
Laclede Gas Company	LDC	A3
New Jersey Natural Gas Company	LDC	Aa2
Northern Natural Gas Company [Private]	LDC	A2
Northwest Natural Gas Company	LDC	A3
Piedmont Natural Gas Company, Inc.	LDC	A2
South Jersey Gas Company	LDC	A2
Southern California Gas Company	LDC	A1
Southwest Gas Corporation	LDC	A3
UGI Utilities, Inc.	LDC	A2
Washington Gas Light Company	LDC	A1
Wisconsin Gas LLC [Private]	LDC	A1
Yankee Gas Services Company	LDC	Baa1
AEP Texas Central Company	T&D	Baa1
AEP Texas North Company	T&D	Baa1
Atlantic City Electric Company	T&D	Baa2

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Baltimore Gas and Electric Company	T&D	A3
CenterPoint Energy Houston Electric, LLC	T&D	A3
Central Hudson Gas & Electric Corporation	T&D	A2
Central Maine Power Company	T&D	A3
Cleveland Electric Illuminating Company (The)	T&D	Baa3
Commonwealth Edison Company	T&D	Baa1
Connecticut Light and Power Company	T&D	Baa1
Consolidated Edison Company of New York, Inc.	T&D	A2
Dayton Power & Light Company	T&D	Baa3
Delmarva Power & Light Company	T&D	Baa1
Duke Energy Ohio, Inc.	T&D	Baa1
Jersey Central Power & Light Company	T&D	Baa2
Metropolitan Edison Company	T&D	Baa1
Monongahela Power Company	T&D	Baa2
New York State Electric and Gas Corporation	T&D	A3
NSTAR Electric Company	T&D	A2
Ohio Edison Company	T&D	Baa1
Ohio Power Company	T&D	Baa1
Oncor Electric Delivery Company LLC	T&D	Baa1
Orange and Rockland Utilities, Inc.	T&D	A3
PECO Energy Company	T&D	A2
Pennsylvania Electric Company	T&D	Baa2
Pennsylvania Power Company	T&D	Baa1
Potomac Edison Company (The)	T&D	Baa2
Potomac Electric Power Company	T&D	Baa1
Public Service Electric and Gas Company	T&D	A2
Rochester Gas & Electric Corporation	T&D	Baa1
Texas-New Mexico Power Company	T&D	Baa1
Toledo Edison Company	T&D	Baa3
West Penn Power Company	T&D	Baa1
Western Massachusetts Electric Company	T&D	A3
Alabama Power Company	Vertically Integrated Utility	A1
ALLETE, Inc.	Vertically Integrated Utility	A3
Appalachian Power Company	Vertically Integrated Utility	Baa1
Arizona Public Service Company	Vertically Integrated Utility	A3
Avista Corp.	Vertically Integrated Utility	Baa1
Black Hills Power, Inc.	Vertically Integrated Utility	A3
Cleco Power LLC	Vertically Integrated Utility	A3
Consumers Energy Company	Vertically Integrated Utility	A1
DTE Electric Company	Vertically Integrated Utility	A2
Duke Energy Carolinas, LLC	Vertically Integrated Utility	A1
Duke Energy Florida, Inc.	Vertically Integrated Utility	A3
Duke Energy Kentucky, Inc.	Vertically Integrated Utility	Baa1
Duke Energy Progress, Inc.	Vertically Integrated Utility	A1
El Paso Electric Company	Vertically Integrated Utility	Baa1
Empire District Electric Company (The)	Vertically Integrated Utility	Baa1
Entergy Arkansas, Inc.	Vertically Integrated Utility	Baa2
Entergy Gulf States Louisiana, LLC	Vertically Integrated Utility	Baa1
Entergy Louisiana, LLC	Vertically Integrated Utility	Baa1
Entergy Mississippi, Inc.	Vertically Integrated Utility	Baa2
Entergy New Orleans, Inc.	Vertically Integrated Utility	Ba2
Entergy Texas, Inc.	Vertically Integrated Utility	Baa3
Florida Power & Light Company	Vertically Integrated Utility	A1
Georgia Power Company	Vertically Integrated Utility	A3
Gulf Power Company	Vertically Integrated Utility	A2
Hawaiian Electric Company, Inc.	Vertically Integrated Utility	Baa1
Idaho Power Company	Vertically Integrated Utility	A3
Indiana Michigan Power Company	Vertically Integrated Utility	Baa1
Interstate Power and Light Company	Vertically Integrated Utility	A3
Kansas City Power & Light Company	Vertically Integrated Utility	Baa1
Kentucky Power Company	Vertically Integrated Utility	Baa2

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Madison Gas and Electric Company	Vertically Integrated Utility	A1
MidAmerican Energy Company	Vertically Integrated Utility	A1
Mississippi Power Company	Vertically Integrated Utility	Baa1
Nevada Power Company	Vertically Integrated Utility	Baa1
Northern States Power Company (Minnesota)	Vertically Integrated Utility	A2
Northern States Power Company (Wisconsin)	Vertically Integrated Utility	A2
NorthWestern Corporation	Vertically Integrated Utility	A3
Oklahoma Gas & Electric Company	Vertically Integrated Utility	A1
Pacific Gas & Electric Company	Vertically Integrated Utility	A3
PacifiCorp	Vertically Integrated Utility	A3
Portland General Electric Company	Vertically Integrated Utility	A3
PPL Electric Utilities Corporation	Vertically Integrated Utility	Baa1
Public Service Company of Colorado	Vertically Integrated Utility	A3
Public Service Company of New Hampshire	Vertically Integrated Utility	Baa1
Public Service Company of New Mexico	Vertically Integrated Utility	Baa2
Public Service Company of Oklahoma	Vertically Integrated Utility	A3
Puget Energy, Inc.	Vertically Integrated Utility	Baa3
Puget Sound Energy, Inc.	Vertically Integrated Utility	Baa1
San Diego Gas & Electric Company	Vertically Integrated Utility	A1
Sierra Pacific Power Company	Vertically Integrated Utility	Baa1
South Carolina Electric & Gas Company	Vertically Integrated Utility	Baa2
Southern California Edison Company	Vertically Integrated Utility	A2
Southwestern Electric Power Company	Vertically Integrated Utility	Baa2
Southwestern Public Service Company	Vertically Integrated Utility	Baa1
Tampa Electric Company	Vertically Integrated Utility	A2
Tucson Electric Power Company	Vertically Integrated Utility	Baa1
Union Electric Company	Vertically Integrated Utility	Baa1
Virginia Electric and Power Company	Vertically Integrated Utility	A2
Wisconsin Electric Power Company	Vertically Integrated Utility	A1
Wisconsin Power and Light Company	Vertically Integrated Utility	A1
Wisconsin Public Service Corporation	Vertically Integrated Utility	A1

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CASE: UE 294
WITNESS: MATT MULDOON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 211

**Frequency of General Rate Case Filings
by PGE's Investor Owned Regulated
Peer Electric Utilities
(As Screened by Staff)**

**Exhibits in Support
of Opening Testimony**

June 15, 2015

Frequency of General Rate Case Filings

Frequency of General Rate Cases by Investor Owned Regulated Utilities

Staff Peer Utilities for PGE

Y Indicates a General Rate Case Filing in that Year.

Yreview (Yrev) Indicates a Tariff Review Yabbreviated (Yabr) Indicates an Abbreviated Rate Case.

Acquired (Acq) indicates the Co. was acquired in that year.

#	Abbreviated Electric Utility	Ticker	Year																
			2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	
1	AEP	AEP																	
	AEP Texas		N	N	N	Y	N	N	Y	N	N	N	N	N	N	N	N		
	AEP App. Pwr (TN)		N	N	N	N	N	N	N	N	N	N	N	N	N	N	N		
	AEP Ohio		N	Y	N	N	N	N	N	N	N	N	Y	N	N	N	N		
	App. Power, VA		N	N	N	N	N	N	N	N	Y	N	N	Yrev	N	N	Yrev		
	App. Power WVA		N	N	N	N	N	Y	N	N	N	N	Y	N	N	N	Y		
	Indiana/Michigan IN		N	N	N	N	N	N	N	Y	N	N	N	Y	N	N	N		
	Indiana/Michigan MI		N	N	N	N	N	N	N	N	N	N	Y	Y	N	N	N		
	Kentucky Power		N	N	N	N	N	Y	N	N	N	Y	N	N	N	N	Y		
	PSCo of Okla		N	N	N	Y	N	N	Y	N	Y	N	Y	N	N	N	Y		
	SWEPSCO AR		N	N	N	N	N	N	N	N	N	Y	N	N	N	N	N		
	SWEPSCO LA		N	N	N	N	N	N	N	N	Y	N	N	N	N	Y	N		
	SWEPSCO TX		*	*	*	*	*	*	*	*	*	Acq	Y	N	N	Y	N	N	
13	DTE (DTE Electric)	DTE	N	N	N	N	Y	N	Y	N	N	Y	N	N	N	Y	Y		
15	Edison Int'l	EIX	N	N	N	N	Y	N	N	N	N	N	N	N	Y	N	N		
21	Great Plains	GXP																	
	Kansas City P&L (MO)		N	N	N	N	N	N	Y	N	Y	N	Y	N	N	N	N		
	KCP&L (Kansas)		N	N	N	N	N	N	Y	Y	Y	Y	N	N	Y	YAbr	N	N	
	GMO (MO)		N	N	N	Y	N	N	Y	N	N	N	Y	N	N	N			
23	IDACORP	IDA																	
	IdahoPower (ID)		N	N	N	Y	N	Y	N	Y	Y	N	N	Y	N	N	N		
	IdahoPower OR)		N	N	N	N	Y	N	N	N	N	Y	N	Y	N	N	N		
32	Otter Tail	OTTR																	
	OtterTail MN		N	N	N	N	N	N	N	Y	N	N	Y	N	N	N	N		
	OtterTail ND		N	Y	N	N	N	N	N	N	Y	N	N	N	N	N	N		
	OtterTail SD		N	N	N	N	N	N	N	N	N	N	Y	N	N	N	N		
34	PG&E	PCG	N	N	Y	Y	N	Y	N	N	N	Y	N	N	Y	N	N		
37	PNM	PNM																	
	PNM (NM)		Y	N	N	Y	N	Y	N	Y	Y	N	Y	N	N	N	Y		
	PNM (TX)		N	Y	N	N	N	N	N	N	Y	N	Y	N	N	N	N		
48	Westar	WR	N	Y	N	N	N	Y	N	N	Y	Y Abr	N	N	Y	Y Abr	N	Y	

CASE: UE 294
WITNESS: GEORGE R. COMPTON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 300

Opening Testimony

June 15, 2015

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is George R. Compton. I have been employed by the Public Utility
3 Commission of Oregon since March of 2007. I am a Senior Economist (half-
4 time) within the Energy, Rates, Finance, and Audits Division. My business
5 address is 3930 Fairview Industrial Dr. SE, Salem, Oregon 97308-1088.

6 **Q. Please describe your educational background and work experience.**

7 A. My Witness Qualification Statement is found in Exhibit Staff/301.

8 **Q. What is the purpose of your testimony?**

9 A. I will be addressing elements of cost allocations, rate spread (i.e., the
10 allocation of the overall revenue increase among the various customer
11 schedules), and pricing/rate design.

12 **Q. Does Staff possess a general philosophy or approach to these**
13 **subjects?**

14 A. Yes. As a general matter, pricing and customer cost allocations should reflect
15 long-run-incremental cost (LRIC) causation as much as possible. A long-
16 recognized "rates shock" exception to cost causation is to limit class revenue
17 requirement increases to some designated level above the overall average.

18 **Q. Did you prepare exhibits for this docket?**

19 A. Yes. I prepared exhibits connected with each of the topics listed below.

20 **Q. How is your testimony organized?**

21 A. My testimony is organized as follows:

- 22 Topic 1: Transmission Cost Allocation.....4
- 23 Topic 2: Merging (or Not) Schedules 32 and 47.....6

1 Topic 3: Merging (or Not) Schedules 38 and 49..... 11

2 Topic 4: Miscellaneous Items..... 16

3 **Q. Please give us an overview of your testimony.**

4 A. Over the years Portland General Electric's (PGE's or Company's) practices
5 relating to my areas of responsibility have evolved in a mutually acceptable
6 manner—being influenced by various parties, including Staff. My issues in
7 this testimony have to do with items of departure from past practices. In this
8 docket, the Company introduces an alternative approach to allocating
9 transmission costs. It also proposes rate design and customer impact offset
10 (CIO) modifications in the interest of eventually combining irrigation
11 Schedules 47 and 49 with, respectively, commercial/industrial Schedules 32
12 and 38. My recommendations are generally to not depart as significantly as
13 PGE has with the status quo and to make modest changes regarding these
14 topics.

15 **Q. Please summarize Staff's position regarding transmission cost**
16 **allocations?**

17 A. Currently 65 percent of transmission costs are allocated according to the
18 various customer schedules' shares of the sums of the four highest-month
19 (December, January, July, and August) coincident peak demands (i.e., 4 CP),
20 with the remaining 35 percent allocated in proportion to the customer
21 schedules' shares of the energy revenue requirement. The Company now
22 proposes to eliminate energy from the cost allocator and use shares of all
23 twelve coincident peak loads (i.e., 12 CP) as the exclusive transmission costs

1 allocator. Staff recommends staying with the current status quo, except to
2 reduce the energy contribution to 25 percent from the current level of 35
3 percent.

4 **Q. Would you now please summarize Staff's position regarding the**
5 **merging of the agricultural Schedules 47 and 49 (Ag) with, respectively,**
6 **commercial/industrial Schedules 32 and 38 (C/I)?**

7 A. The Company is stating that it wants to eventually consolidate those two pairs
8 of schedules.¹ To that end, the Company in this docket proposes to elevate
9 the C/I's rates and allocations/target revenues and lower those of the Ag
10 schedules beyond what would be called for under standard regulatory and
11 cost-causation practices. Beyond that general theme, two different
12 subsidization strategies are employed. Because Schedule 32 is so much
13 larger than Schedule 47, it was feasible to "pay for" Schedule 47's additional
14 rate reductions by a slight increase in its own rates. Partly because Optional
15 Time-of-Day Schedule 38 is so much smaller in load aggregates than
16 Schedule 49, the Company chose to place the large bulk of the burden of
17 subsidizing Schedule 49's rates upon Schedule 83, whose size-of-load range
18 for customers is comparable to that of Schedules 38 and 49--i.e., minimum
19 loads are in excess of 31 kW. Staff rejects the cross-subsidizations by
20 Schedules 32 and 83, and otherwise recommends setting the subject Ag and
21 C/I rates and allocations as close to cost of service levels as is reasonable.

22

¹ See Exhibit PGE/1400, Cody/22-23.

1 **Topic 1: Transmission Cost Allocation**

2 **Q. How are transmission costs currently allocated among the various**
3 **schedules?**

4 A. The costs have been separated into a demand component, which accounts
5 for 65 percent of the costs, and an energy component that accounts for the
6 remaining 35 percent. The energy portion has been allocated in proportion to
7 the schedules' shares of test period energy revenues; the demand portion
8 has been allocated in proportion to their shares of the sums of the schedules'
9 coincident peak demands for the months December, January, July, and
10 August. The shorthand for the latter is 4CP. A 12CP allocator would employ
11 all twelve monthly coincident peaks.

12 **Q. How has the Company proposed to alter that allocations approach, and**
13 **what is its justification for doing so?**

14 A. The Company proposes a simple 12CP allocator, with no energy component.
15 The justification is to make it "consistent with how PGE's FERC transmission
16 prices are determined."²

17 **Q. On what general grounds does Staff dispute the Company's approach?**

18 A. I see a departure from cost-causation and fairness. Just because PGE and
19 its direct access customers pay rates that are not soundly based upon costs
20 is no reason to compel PGE's own customers to pay rates that are not
21 soundly based.

22 **Q. Please explain.**

² See Exhibit PGE/1400, Cody/5.

1 A. The cost of a transmission line is a function of its length and of its capacity, or
2 load bearing capability. The capacity is driven by the annual peak load, which
3 will occur in one of the four months listed above. Loads in the off-peak
4 months have no bearing on cost causation. It is for this reason that Staff
5 opposes the PGE proposal to use the twelve coincident peaks to capture load
6 bearing requirements. The length of the transmission line(s) is driven by
7 distances between generation plants and loads and by distances required to
8 interconnect with other utilities' transmission systems. When, for example,
9 transmission costs are reduced by bringing a coal-fired generation plant
10 closer to the primary load or transmission interconnection point, coal
11 transportation costs—which are appropriately allocated according to energy
12 consumption—are increased. That is transmission is a substitute for plant
13 location and rail costs. You can transport the fuel by rail and burn the fuel
14 locally, or you can burn the fuel remotely and use transmission lines to move
15 the electrical power closer to loads. Hence the recognition of an energy
16 component to transmission cost allocations due to the trade-off between the
17 transmission investment and fuel costs. Transmission also serves as a
18 substitute for generation in the sense that interconnection with other utilities
19 and power markets allows for both capacity and fuel/energy cost savings.
20 Given those energy cost-savings implications, it is regarded as fair—based
21 upon benefits received—that customers who use more energy than others
22 should have a somewhat larger allocation of transmission costs.

23

1 **Q. How is Staff recommending that transmission costs be allocated?**

2 A. We are recommending that schedules' energy shares bear a 25% share of
3 the costs, with the remaining 75 percent allocated using the same 4CP
4 approach as under the status quo.

5 **Q. Why hasn't Staff stuck with the 65 percent capacity share that is**
6 **currently embodied in rates?**

7 A. Had PGE not proposed a change, Staff would likely have supported
8 remaining with the status quo. However because PGE has proposed a
9 change, Staff has chosen to shift to its 75 percent capacity weighting in
10 recognition of the fact that, traditionally, transmission cost allocation is
11 weighted more heavily on the capacity side. Shrinking the energy weighting
12 also constitutes a compromise with having an allocator that does not weigh
13 energy at all.

14 **Q. Has Staff prepared an exhibit which shows how transmission costs are**
15 **allocated under the status quo, the Company's proposal, and Staff's**
16 **counter-proposal?**

17 A. Yes. It is Exhibit Staff/302.

18

19 **Topic 2: Merging (or Not) Schedules 32 and 47**

20 **Q. Owing to their unique load characteristics (i.e., loads preponderantly in**
21 **the summer) agricultural pumping customers have been served on**
22 **schedules specifically dedicated to them—i.e., Schedules 47 and 49.**

23 **What significant change has PGE proposed for these schedules?**

1 A. In the current case the Company has expressed an interest in consolidating
2 those schedules with the commercial/industrial schedules of comparable
3 maximum kW load levels. While the consolidation itself is not being proposed
4 with this docket, prices are being suggested that would move in that
5 direction.³

6 **Q. What justification is being offered for this consolidation plan?**

7 A. Basically PGE's justification for consolidating Schedules 38 and 49 is to
8 "achieve cost efficiencies."⁴ Similar pricing treatment is proposed for
9 Schedules 32 and 47.⁵

10 **Q. Does Staff favor administrative costs savings?**

11 A. Yes as long as the prices that are a consequence thereof do not violate the
12 cost causation principle in an unacceptable fashion for a significant block of
13 customers. It is Staff's judgment in this case that indeed the Company's rate
14 design and cost allocations would constitute an unacceptable departure from
15 cost causation and other well-accepted utility regulatory principles.

16 **Q. What price movements are being proposed by PGE in this docket in the
17 case of Schedule 47 and the Company-viewed companion Schedule 32?**

18 A. Because the incurred distribution costs are to be recovered over a six-month
19 "summer" period as opposed to an entire year, the Ag schedules distribution-
20 related prices have always been high compared to those of the conventional,
21 year-round C/I schedules. So with rates consolidation the expectation would

³ See Exhibit PGE/1400, Cody/22-23.

⁴ See Exhibit PGE/1400, Cody/22.

⁵ See Exhibit PGE/1400, Cody/23.

1 be to reduce the Ag schedule's distribution price and elevate the companion
2 C/I schedule's distribution price in order to bring the two sets of prices closer
3 together. In the present docket, PGE proposes that small C/I Schedule 32
4 would have prices somewhat in excess of costs while Schedule 47 would
5 have its corollary prices well below costs. In fact, as shown on page 1 of
6 Exhibit PGE/1402, Cody, the base rates for Schedule 47 would hardly be
7 elevated at all. And the burden of the implicit Schedule 47 subsidy is being
8 borne entirely by the elevation in Schedule 32's prices.⁶

9 **Q. Is it not the norm for the agricultural schedules to have prices well**
10 **below costs?**

11 A. Yes, but only because these schedules were once well below costs and as
12 opportunity arises rate changes have been slowly transitioning the schedules
13 to a comparable cost-recovery basis. For the past several general rate
14 cases, the Commission has adopted in its orders a rate spread in which
15 agricultural schedules have experienced general rate increases well above
16 the average—as in the 12.5 percent increase the Company is proposing for
17 Schedule 49 (see Exhibit PGE/1402, Cody/1). And instead of simply lowering
18 one or more price elements (in this case the distribution charge) well below
19 functionalized costs, the conventional practice is for the price to be kept
20 approximately at costs and the effective subsidy is then taken care of through
21 the customer impact offset (CIO) line item. The CIO application makes the

⁶ Page 5 of Cody Exhibit 1403 shows target test period revenues for Schedule 47 as being \$1,832 (x1000) *beneath* the functional cost allocation (i.e., \$5,534 minus \$3,702), while Page 4 of Cody Exhibit 1403 shows target test period revenues for Schedule 32 as being \$1,821 (x1000) *above* the functional cost allocation (i.e., \$181,839 minus \$180,018).

1 subsidy transparent, and instead of the subsidy being borne by a particular
2 customer schedule, it is normally spread among a number of schedules—
3 typically those for which the proposed percentage revenue increases are
4 beneath the overall system average.

5 **Q. How do you propose to price agricultural Schedule 47?**

6 A. In the conventional way, i.e., by setting the distribution charge near cost and
7 using the CIO credit to bring the overall increase down to the rate-shock-
8 mitigating 12.5 percent ceiling.

9 **Q. Have you prepared an exhibit which shows your and the Company's**
10 **rates and revenue target proposals for Schedule 47?**

11 A. Yes, it is Page 1 of Exhibit Staff/303. The point of departure for this exhibit is
12 Mr. Cody's Exhibit PGE/1403. It assumes that the Company will receive the
13 revenue increase that it has requested and that the functionalized cost
14 allocations will remain the same. While those assumptions will likely not hold
15 up when this docket is ultimately resolved, in order to make clear the policy
16 distinctions between Staff and PGE, it is expedient for this exhibit to share a
17 common foundation, i.e., the Company's applied-for revenue requirement and
18 functional cost-of-service allocations.

19 **Q. Would you please describe key elements in your exhibit and note its**
20 **conclusions?**

21 A. Yes. The top portion of Exhibit Staff/303 shows the Company's functional
22 long-run incremental cost allocations. For most schedules these functional
23 elements set the target prices for the respective prices that appear below. In

1 this answer I will point out how PGE departs from that practice in setting the
2 prices contained in Schedule 47. Similar points will be made later in this
3 testimony with regard to Schedules 32, 38, and 49. Contrasting sets of prices
4 are highlighted: most of the Company's pricing proposals (i.e., the non-
5 highlighted ones) are also accepted. The difference in the two revenue
6 targets is also shown. PGE would have Schedule 47's revenue target be 33
7 percent below its own functionalized cost-of-service estimate of costs. That
8 reduction is achieved by setting the distribution charge at about half its
9 functionalized cost. Staff keeps the energy and distribution charges near their
10 functionalized costs and holds the revenue target increase at 12.5 percent by
11 use of a substantial CIO credit. The 12.5 percent is the PGE-recommended
12 increase for agricultural Schedule 49 shown on page 1 of Mr. Cody's Exhibit
13 PGE/1402. Staff accepts that recommendation, and would apply it to both
14 agricultural schedules. The resulting revenue target for Schedule 47 comes
15 out to be 25 percent below the cost-of-service estimate.⁷

16 **Q. Assuming that in the aggregate the schedules' target revenues are to**
17 **sum to the overall target revenue requirement, when one schedule's**
18 **target is beneath its costs then other schedules' targets must be in**
19 **excess of costs. As described above, the function of the CIO is to make**
20 **explicit the burdens that the various customer schedules must bear in**
21 **order that other schedules' target revenues can be beneath their**

⁷ PGE: $(5,534 - 3,702) / 5,534 = 33\%$. Staff: $(5,534 - 4,154) / 5,534 = 25\%$.

1 **functionalized costs of service. Was that the case under the Company's**
2 **proposal?**

3 A. No, it was not. As I testified earlier, instead of spreading the burden over
4 several different customer schedules via the CIO mechanism, the Company
5 would place the entire burden on small C/I Schedule 32. (Again, the
6 justification was to elevate Schedule 32's rates to bring them closer in
7 conformance with Schedule 47's rates—with eventual consolidation of
8 Schedules 32 and 47 in mind.) Staff regards forcing Schedule 32 to bear the
9 entire burden of lowering Schedule 47's rates far below costs as quite unfair.
10 We would also look upon consolidation itself with disfavor if it "artificially"
11 elevates to levels above their own costs the rates that the Schedule 32
12 customers would have to pay. Staff is uncomfortable with penalizing
13 Schedule 32 customers for having to be paired up with agricultural customers
14 for the sake of incidental administrative cost savings.

15 **Q. Rejecting the intent to consolidate Schedule 32 with Schedule 47 in the**
16 **manner implicit in this docket, how would you alter PGE's Schedule 32**
17 **revenue target and rate design?**

18 A. In common with the Company, distribution charges must be something above
19 functionalized costs in order to compensate for basic charges being beneath
20 their functionalized costs. My only departure from the Company would be to
21 elevate Schedule 32's distribution charges only to the degree that the target
22 will equal the schedule's total functionalized cost of service.

1 **Q. Have you prepared an exhibit which displays what you have just**
2 **described for Schedule 32?**

3 A. Yes, it is Page 2 of Exhibit Staff/303.

4 **Q. So is your only concern regarding consolidating Schedules 32 and 47**
5 **the fact that Schedule 32 would be the sole “subsidizer” of**
6 **Schedule 47?**

7 A. No. Schedules 32 and 47 have significant cost of service differences that
8 justify keeping them as separate schedules.

9

10 **Topic 3: Merging (or Not) Schedules 38 and 49**

11 **Q. You previously testified that PGE has also expressed a desire to**
12 **eventually merge Optional Time-of-Day Schedules 38 with Ag Schedule**
13 **49. Does the Company approach that consolidation through elevating**
14 **and suppressing rates in the same manner as they approached an**
15 **eventual Schedules 32 and 47 consolidation, i.e., by bringing one of**
16 **Schedule 49’s rate component’s price to a level well below costs and**
17 **having Schedule 38 bear the burden of the Schedule 49 subsidy be**
18 **experiencing rates that are well above costs?**

19 A. No, the Company approaches things quite differently here. The reason is that
20 Schedule 32 is very much larger than Schedule 47, and can therefore absorb
21 an extra cost burden without an inordinate increase in its own rates...while on
22 the other hand, Schedule 38 is substantially smaller than Schedule 49,
23 making it not feasible for the Schedule 38 customers to subsidize Schedule

1 49 in a material way by elevating its own rates. In the interest of an eventual
2 schedule consolidation, PGE does in fact move Schedule 38's rates well
3 above the cost-of-service justified level, but the outcome is not a significant
4 level of subsidy for Schedule 49.

5 **Q. So what is PGE's Schedule 49 subsidization proposal in this case?**

6 A. It is to subsidize Schedule 49 in the usual CIO manner, but rather than having
7 the CIO burden be shared by a number of other customer schedules (i.e.,
8 also in the usual manner), the CIO burden would be placed almost entirely
9 upon C/I Schedule 83.

10 **Q. How does PGE justify placing that burden upon Schedule 83?**

11 A. If there were no Schedule 49 at all, then given its minimum load level (i.e., 30
12 kW), most of those Schedule 49 customers would be part of Schedule 83,
13 thereby bringing up that schedule's average costs.

14 **Q. Is PGE proposing to merge Schedule 49 with C/I Schedule 83?**

15 A. No.

16 **Q. Is Staff persuaded by PGE's logic for having Schedule 83 subsidize Ag
17 Schedule 49?**

18 A. No. With Schedules 32 and 47 the Company in essence is saying, "We want
19 to eventually consolidate those schedules, so we will lower Schedule 47's
20 rates and elevate Schedule 32's to move us a long way towards what the
21 consolidated rates would look like, and we'll do it in a way that does not
22 burden other customer schedules." With Schedules 38 and 49 the Company
23 in essence is saying, "We want to eventually consolidate those schedules,

1 and we will move their rates together somewhat in this docket. But PGE
2 cannot elevate Schedule 38's rates enough to allow us to materially lower
3 Schedule 49's rates, so we'll elevate Schedule 83's rates even though there
4 is no intention to combine Schedule 49 with Schedule 83...but *if* they were
5 combined then Schedule 83's average rates would indeed go up." In my
6 mind, expressing the Company's positions in those simple and
7 straightforward ways, makes rejecting the Company's approach to dealing
8 with Schedule 83 also simple and straightforward. Alternatively, it can be
9 stated that when two sets of customers have materially different load patterns
10 in an overall sense, then one set of customers should not be penalized simply
11 because of a similarity in one aspect of its load characteristics (in this case
12 their minimum or maximum loads).

13 **Q. You indicated that the Company aspires to consolidating Schedules 38**
14 **and 49, does PGE shrink some of the latter schedule's rates in**
15 **comparison with the corresponding functionalized costs in a manner**
16 **comparable to what they did with Schedule 47?**

17 A. Yes, but not to the same degree because with Schedule 49 there is a
18 aforementioned major CIO credit to contribute to the subsidy.

19 **Q. Have you prepared an exhibit which displays how you believe Schedule**
20 **49 should be structured?**

21 A. Yes, it is page 1 of Exhibit Staff/304.
22
23

1 **Q. Please summarize the conclusions from that exhibit.**

2 A. Compared to the PGE proposal, the energy and distribution charges are set
3 to levels closer to their respective functionalized costs. In order to avoid
4 revenues that exceed the target, it was necessary to elevate the CIO credit to
5 offset the increased revenues from the energy and distribution charges.

6 **Q. Does the elevation of the CIO credit translate to a net subsidy burden on**
7 **the part of other customer schedules?**

8 A. No it does not...at least it should not. Offsetting the increased CIO credit
9 should be a reduction in the other rates and associated cost allocations that
10 are experienced by the other customer schedules. For example, elevating
11 the energy charge as indicated means that Schedule 49 would now be
12 contributing more toward covering energy costs; therefore the energy cost
13 burden borne by all other, or selectively other, schedules can be smaller than
14 it otherwise would be. As currently constructed, the Company's cost
15 allocation/rate spread/rate design model lacks the dexterity to adjust the rates
16 of more than a single tied-in schedule in order to do what I have just
17 described. However, given the need, the model can be appropriately
18 expanded.

19 **Q. What is PGE proposing to do in this docket with Schedule 38?**

20 A. In the interest of moving Schedule 38's rates closer to those of Schedule 49,
21 PGE proposes to elevate Schedule 38's energy and distribution charges
22 above their functionalized cost of service levels. (A small increase in the
23 distribution charge was also required to offset low basic charges.) But in

1 elevating those charges, the target revenue requirement of Schedule 38
2 would be raised to a grossly unacceptable level. To avoid this latter
3 condition, the Company proposes the significant CIO credit offset that was
4 mostly directed to Schedule 83.

5 **Q. How would you set the prices for Schedule 38?**

6 A. Compared to the Company proposal, I would lower the distribution and
7 energy prices to be as close as reasonable to their functionalized cost of
8 service levels with the intent of meeting target revenues that equal the total
9 functionalized cost of service for this customer schedule.

10 **Q. Have you prepared an exhibit which displays what you have just**
11 **described?**

12 A. Yes, it is Page 2 of Exhibit Staff/304.

13 **Q. What is the overall percentage increase in base rates that PGE is**
14 **requesting?**

15 A. It is 2.1 percent.⁸

16 **Q. I see from Page 2 of your Exhibit Staff/304 that you would have Schedule**
17 **38's revenue target go up by 5.5 percent relative to what would be**
18 **produced by rates now in effect, while the Company is proposing an 11.3**
19 **percent increase. Do you have any comment?**

20 A. Yes. Another key argument against elevating Schedule 38's rates for the
21 "mere" purpose of bringing them closer to Ag Schedule 49 rates is that the
22 Company's cost allocations already suggest an increase that is more than

⁸ See Exhibit PGE/1402, Cody/1.

1 twice the overall average. It would be grossly unfair to more than double down
2 on that increase—taking it to more than five times the overall average
3 percentage increase.

4 **Q. Do you support the goal of consolidating Schedule 38 and Schedule 49?**

5 A. No. These schedules have sufficient cost differences that it does not make
6 sense to combine the schedules, or to move toward consolidation at this time.

7

8 **Topic 4: Miscellaneous Items**

9 **Q. Staff witness Suparna Bhattacharya performed analyses on the subject**
10 **of generation long-run incremental costs. Are you familiar with her**
11 **work?**

12 A. Yes I am.

13 **Q. What impact will her results have on the various customer schedules?**

14 A. Final results await additional input from PGE. But the general thrust is to
15 elevate generation cost allocations to high load factor industrial customers,
16 and reduce them for the lower load factor residential customers. Basing
17 conclusions on prior Company inputs, Schedules 7, 83, and 85 would be
18 slightly net beneficiaries from a combination of Staff's transmission and
19 generation cost allocations, and Schedules 89 and 90 would receive slightly
20 larger net cost allocations. When I say "slightly" I mean, in the case of a
21 "harmed" customer, something in the neighborhood of \$120 thousand out of a
22 \$90 million revenue requirement. That means the impacts of Staff's
23 recommendations in this regard are not significant.

1 **Q. In reviewing Tables 1 through 5 of Exhibit PGE1402, I see that all of the**
2 **direct access customers are to achieve large-percentage decreases—**
3 **sometimes close to 40 percent. Did that initially raise some concerns?**

4 A. Yes in the sense of provoking something of an investigation into the
5 underlying causes. However, after my review I support PGE's
6 recommendations for this issue.

7 **Q. What did you find that led you to this conclusion?**

8 A. Bear in mind that direct access customers pay facilities and basic charges
9 that are identical to those paid by their parallel full-service retail customers.⁹

10 It turns out that in the docket that established current rates, UE 283, the
11 facilities charge picked up an "Under-recovery of other charges" that was a
12 large dollar figure and the basic, or customer, charge picked up a large
13 magnitude of "Other Consumer" costs. I accept PGE's representation that
14 recent cost allocation accounting and modelling refinements have placed a lot
15 of the subject dollars into categories which, unlike the facilities and basic
16 charge, do not serve as a repository for costs that heretofore were not readily
17 categorized. The presumption is that the facilities and basic charges
18 proposed in the current docket are more expressly cost based than are their
19 predecessors, and are therefore worthy of adoption.

20 **Q. Have you prepared an exhibit which displays the differences between**
21 **UE 283 and UE 294 regarding "Other Consumer" costs and the "Under-**
22 **recovery of other charges" relating to facilities charges?**

⁹ For example, Schedule 485-P customers pay the same basic charge as is paid by Schedule 85-P customers.

1 A. Yes, Exhibit Staff/305. Contrast the highlighted figures on Page 1 with those
2 on Page 2 of this exhibit to see a dramatic reduction in the facilities charges
3 under-recovery between Dockets 283 and 294; and contrast the highlighted
4 figures on Page 3 with those on Page 4 to see the dramatic reduction in
5 “Other Consumer” costs.

6 **Q. PGE proposes to increase its residential monthly customer charge from**
7 **\$10 to \$11. Does Staff approve?**

8 A. In this case where, disregarding Carty, overall basic rates are likely to move
9 hardly at all, Staff is uncomfortable with the proposed ten percent increase in
10 the customer charge. As a general rule we accept modest customer charge
11 increases over time so as to match incremental customer costs, which are
12 indeed somewhat above the \$11 dollar figure. Placing that general rule in the
13 context of a modest general rate increase, perhaps a 50 cent per month
14 increase would be appropriate—*provided such would not lead to decreases in*
15 *other non-fuel-related charges.*

16 **Q. Can your recommendations regarding Schedules 32, 38, 47, 49, and 83,**
17 **be summarized as a) Schedule 32 should not be required to subsidize**
18 **Schedule 47, b) the target revenues for Schedules 32 and 38 should be**
19 **their own functionalized cost allocations, c) target revenue increases for**
20 **both Schedule 47 and 49 should be 12.5 percent, with the subsidies**
21 **coming through the conventional CIO mechanism, and d) Schedule 83**
22 **should not have to bear the brunt of the cross-schedule subsidies,**
23 **primarily for Schedule 49?**

1 A. Yes.

2 **Q. Does Staff have a recommendation regarding what rates should go into**
3 **the CIO mechanism?**

4 A. Yes. In the past Staff has recommended that contributions into the CIO
5 balance should come from customer schedules which otherwise would enjoy
6 increases beneath the overall system average. There is ambiguity in that
7 regard in the current docket. Referring to page 1 of Exhibit PGE/1402, one
8 sees that the proposed residential increase exceeds the average and the
9 industrial schedule increases are beneath the average¹⁰—arguing for the
10 industrials to bear the primary CIO burden. On the other hand, referring to
11 page 5 of that same exhibit shows the residential schedule receiving an
12 increase that is beneath the overall average.¹¹ Absent a clear picture
13 regarding whether the residential or the industrial customers should bear the
14 CIO burden, it is Staff's recommendation to spread the burden across *all* the
15 major schedules, which would add Schedule 32 to Residential Schedule 7
16 and the large industrial Schedules 83, 85, 89, and 90. Referring to page 1 of
17 both my Exhibits Staff/303 and Staff/304, it is seen that the combined CIO
18 subsidy for the two agricultural schedules is approximately \$6 million.
19 Dividing that amount by the approximately 19.2 million MHW large schedule
20 consumption yields Staff's recommended CIO mill rate of 0.3 mills, or 0.03

¹⁰ Schedule 83 appears as the exception, with an increase of 3.1%. But that figure is a consequence of the Company's placing the CIO burden almost entirely upon that schedule—contrary to Staff's recommendation. Eliminating that unjustified (in Staff's estimation) burden brings Schedule 83's increase down to the one percent range.

¹¹ The difference between page 1 and page 5 is that the latter adds Carty to the revenue requirement. The page 5-related rates are not to go into effect until Carty is actually in service, which is expected to occur during the second quarter of 2016.

1 cents, per kWh. That compares with the PGE proposed Schedule 83 mill rate
2 of 1.73 mills per kWh.¹²

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

4 A. Yes.

¹² See Exhibit PGE/1403, Cody/11.

CASE: UE 294
WITNESS: GEORGE R. COMPTON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 301

Witness Qualification Statement

June 15, 2015

WITNESS QUALIFICATION STATEMENT

NAME: George R. Compton

EMPLOYER: Public Utility Commission of Oregon

TITLE: Senior Economist
Energy Rates, Finance & Audit

ADDRESS: 3930 Fairview Industrial Dr SE
Salem, OR 97308-1088

EDUCATION: Doctor of Philosophy, Economics (1976)
University of California, Los Angeles (UCLA) – Westwood, CA

Master of Science, Statistics (1968)
Brigham Young University (BYU) – Provo, UT

Bachelor of Science, Mathematics and Psychology (1963)
Brigham Young University – Provo, UT

EXPERIENCE: I have been employed in utility regulation since receiving my Ph.D. in 1976. My primary employer was the Division of Public Utilities, within Utah’s Department of Commerce (formerly Business Regulation). I also consulted for a couple of years, early in that period. I testified frequently during my career on rate design, cost-of-service, cost-of-equity, and various policy matters affecting electric, gas, and telephone utilities. While in Utah, I also taught Economics part-time for about ten years at BYU.

Prior to my utility regulatory career, I worked in aerospace for eleven years at McDonnell Douglas (now Boeing) in Southern California.

I joined the OPUC staff soon after “retiring” to Oregon at the end of 2006. Principal cases of my involvement here have included the IRP/CO₂ Risk Guideline (UM 1302), an Avista General Rate Case (UG 181 and 284), PGE General Rate Cases (UE 197, UE 215, UE 262, and UE 283), PacifiCorp General Rate Cases (UE210, UE 246, and UE 263), the NW Natural General Rate Case (UG 221), and the Idaho Power General Rate Case (UE 233).

CASE: UE 294
WITNESS: GEORGE R. COMPTON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 302

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

PORTLAND GENERAL ELECTRIC
ALLOCATION OF TRANSMISSION REVENUE REQUIREMENT
 2016

PGE Proposal			
Schedules	Transmission Allocation Percent	Class Revenue Requirement (x1000)	Rank
Schedule 7	48.53%	\$16,232	
Schedule 15	0.05%	\$16	L
Schedule 32	8.70%	\$2,910	L
Schedule 38	0.18%	\$62	H
Schedule 47	0.12%	\$40	H
Schedule 49	0.36%	\$122	H
Schedule 83	15.21%	\$5,087	H
Schedule 85	11.80%	\$3,945	H
Schedule 85 1-4 MW	4.45%	\$1,487	
Schedule 89 GT 4 MW	4.05%	\$1,353	
Schedule 90-P	6.32%	\$2,112	L
Schedules 91/95	0.22%	\$73	L
Schedule 92	0.01%	\$4	L
Target	100.00%	\$33,444	
12 CP Capacity Allocation	100%		
Energy Allocation	0%		

UE 283			
Schedules	Transmission Allocation Percent	Class Revenue Requirement (x1000)	Rank
Schedule 7	48.07%	\$16,076	L
Schedule 15	0.07%	\$24	H
Schedule 32	8.85%	\$2,961	H
Schedule 38	0.18%	\$62	H
Schedule 47	0.15%	\$51	
Schedule 49	0.47%	\$159	
Schedule 83	14.96%	\$5,004	
Schedule 85	11.63%	\$3,889	
Schedule 85 1-4 MW	4.45%	\$1,489	H
Schedule 89 GT 4 MW	4.17%	\$1,395	H
Schedule 90-P	6.63%	\$2,219	H
Schedules 91/95	0.33%	\$110	H
Schedule 92	0.01%	\$5	H
Target	100.00%	\$33,444	
4 CP Capacity Allocation	65%		
Energy Allocation	35%		

OPUC Staff Proposal			
Schedules	Transmission Allocation Percent	Class Revenue Requirement (x1000)	Rank
Schedule 7	48.83%	\$16,330	H
Schedule 15	0.07%	\$23	
Schedule 32	8.83%	\$2,953	
Schedule 38	0.18%	\$60	L
Schedule 47	0.16%	\$53	H
Schedule 49	0.49%	\$165	H
Schedule 83	14.85%	\$4,966	L
Schedule 85	11.46%	\$3,833	L
Schedule 85 1-4 MW	4.36%	\$1,457	L
Schedule 89 GT 4 MW	4.04%	\$1,350	L
Schedule 90-P	6.40%	\$2,141	
Schedules 91/95	0.32%	\$106	
Schedule 92	0.01%	\$4	L
Target	100.00%	\$33,444	
4 CP Capacity Allocation	75%		
Energy Allocation	25%		

"H" denotes the highest value of the three; "L" denotes the lowest.

Source of Transmission Allocation Percentages: The "Peaks" tab of PGE UE 294 Exhibit 1400 workpapers.

CASE: UE 294
WITNESS: GEORGE R. COMPTON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 303

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

**PORTLAND GENERAL ELECTRIC
SCHEDULE 47 FUNCTIONAL COST ALLOCATIONS AND RATE DESIGN
2016**

Schedule	Allocated		Billing Determinants		Rate		Annual Revenue (\$000)
	Inputs (\$000)	Amount	Unit	Rate	Unit		
SCHEDULE 47							
Irrig. & Drain. Pump. - < 30 kW							
Allocations							
Functional Costs							
Basic Charge							
Single-Phase	56	231	Customers	\$40.74	per cust. per summ. mo.		56
Three-Phase	841	2,921	Customers	\$47.97	per cust. per summ. mo.		841
Trans. & Rel. Serv. Charge	47	20,845	MWh	2.26	mills/kWh		47
Distribution Charges	2,920	20,845	MWh	140.07	mills/kWh		2,920
Franchise Fees & Other	142	20,845	MWh	6.82	mills/kWh		142
Energy Charge	1,528	20,845	MWh	73.29	mills/kWh		1,528
Subtotal	5,534	= total functionalized cost allocation					5,534

PGE Proposed Pricing

Functional Costs							
Basic Charge							
Single-Phase		231	Customers	44	per cust. per summ. mo.		61
Three-Phase		2,921	Customers	44	per cust. per summ. mo.		771
Trans. & Rel. Serv. Charge		20,845	MWh	2.1	mills/kWh		44
Distribution Charge Calc							
First 50 kWh per kW		7,404	MWh	76.77	mills/kWh		568
Over 50 kWh per kW		13,441	MWh	66.77	mills/kWh		897
System Usage Charge Calc							
Franchise Fees & Other		20,845	MWh	2.99	mills/kWh		62
Cust Impact Offset		20,845	MWh	0	mills/kWh		-
System Usage Charge		20,845	MWh	2.99	mills/kWh		62
Energy Charge		20,845	MWh	62.27	mills/kWh		1,298
Reactive Demand Charge		76	kVar	0.5	kVar		0.0
Subtotal with Consumer Impact Offset						Revenue Target	3,702

Staff Proposed Pricing

Functional Costs							
Basic Charge							
Single-Phase		231	Customers	44	per cust. per summ. mo.		61
Three-Phase		2,921	Customers	44	per cust. per summ. mo.		771
Trans. & Rel. Serv. Charge		20,845	MWh	2.1	mills/kWh		44
Distribution Charge Calc							
First 50 kWh per kW		7,404	MWh	142	mills/kWh		1,051
Over 50 kWh per kW		13,441	MWh	139	mills/kWh		1,868
System Usage Charge Calc							
Franchise Fees & Other		20,845	MWh	2.99	mills/kWh		62
Cust Impact Offset		20,845	MWh	(58.82)	mills/kWh		(1,226)
System Usage Charge		20,845	MWh	(55.83)	mills/kWh		(1,164)
Energy Charge		20,845	MWh	73	mills/kWh		1,522
Reactive Demand Charge		76	kVar	0.5	kVar		0.0
Subtotal with Consumer Impact Offset						Revenue Target	4,154
Current Revenues (from Page 1 of Cody Exhibit 1402):							\$3,692,050
Revenue Target = 1.125 times Current Revenues =							\$4,153,556

Observation: Staff elevates energy and distribution charges to be close to functional cost and employs the CIO to bring the revenue target down to 12.5% above current revenues.

Source of Functional Cost Allocations and PGE-Proposed Pricing: PGE UE 294 Exhibit 1403, Cody, Page 5

PORTLAND GENERAL ELECTRIC
SCHEDULE 32 FUNCTIONAL COST ALLOCATIONS AND RATE DESIGN
2016

Schedule	Allocated		Billing Determinants		Rate		Annual Revenue (\$000)
	Inputs (\$000)	Amount	Unit	Rate	Unit		
SCHEDULE 32							
General Service <30 kW							
Allocations							
Functional Costs							
Basic Charge							
Single-Phase	\$17,335	54,838	Customers	\$26.34	per cust. per mo.		17,333
Three-Phase	\$19,297	35,546	Customers	\$45.24	per cust. per mo.		19,297
Trans. & Rel. Serv. Charge	\$3,352	1,599,950	MWh	2.10	mills/kWh		3,360
Distribution Charge	\$35,913	1,599,950	MWh	22.45	mills/kWh		35,919
Franchise Fees & Other	\$4,705	1,599,950	MWh	2.94	mills/kWh		4,704
Energy Charge	\$99,407	1,599,950	MWh	62.13	mills/kWh		99,405
Subtotal	\$180,009	= Staff's Target Revenues					180,018

PGE Proposed Pricing

Functional Costs							
Basic Charge							
Single-Phase		54,838	Customers	\$16.00	per cust. per mo.		10,529
Three-Phase		35,546	Customers	\$22.00	per cust. per mo.		9,384
Trans. & Rel. Serv. Charge		1,599,950	MWh	2.10	mills/kWh		3,360
Distribution Charge							
First 5 MWh		1,408,301	MWh	37.50	mills/kWh		52,811
Over 5 MWh		191,649	MWh	7.00	mills/kWh		1,342
System Usage Charge Calc							
Franchise Fees & Other		1,599,950	MWh	2.99	mills/kWh		4,784
Cust Impact Offset		1,599,950	MWh	0.00	mills/kWh		-
System Usage Charge		1,599,950	MWh	2.99	mills/kWh		4,784
Energy Charge		1,599,950	MWh	62.27	mills/kWh		99,629
Subtotal						Target Revenues	181,839

Staff Proposed Pricing

Functional Costs							
Basic Charge							
Single-Phase		54,838	Customers	\$16.00	per cust. per mo.		10,529
Three-Phase		35,546	Customers	\$22.00	per cust. per mo.		9,384
Trans. & Rel. Serv. Charge		1,599,950	MWh	2.10	mills/kWh		3,360
Distribution Charge							
First 5 MWh		1,408,301	MWh	36.25	mills/kWh		51,051
Over 5 MWh		191,649	MWh	6.64	mills/kWh		1,273
System Usage Charge Calc							
Franchise Fees & Other		1,599,950	MWh	2.99	mills/kWh		4,784
Cust Impact Offset		1,599,950	MWh	0.00	mills/kWh		-
System Usage Charge		1,599,950	MWh	2.99	mills/kWh		4,784
Energy Charge		1,599,950	MWh	62.27	mills/kWh		99,629
Subtotal						Target Revenues	180,009

Observations:

1. Distribution charge is elevated under both proposals to compensate for basic charges being beneath allocations.
2. Staff reduces distribution charge slightly compared to PGE in order to achieve the slightly lower revenues target.

Source of Functional Cost Allocations and PGE-Proposed Pricing: PGE UE 294 Exhibit 1403, Cody, Page 4

CASE: UE 294
WITNESS: GEORGE R. COMPTON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 304

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

PORTLAND GENERAL ELECTRIC
SCHEDULE 49 FUNCTIONAL COST ALLOCATIONS AND RATE DESIGN
2016

Schedule	Allocated Inputs (\$000)	Billing Determinants		Rate		Annual Revenue (\$000)
		Amount	Unit	Rate	Unit	

SCHEDULE 49

Irrig. & Drain. Pump. - < 30 kW

Allocations

Functional Costs

Basic Charge						
Single-Phase	\$2	3	Customers	\$94.39	per cust. per summ. mo.	\$2
Three-Phase	\$779	1,346	Customers	\$96.51	per cust. per summ. mo.	\$779
Trans. & Rel. Serv. Charge	\$142	62,677	MWh	2.27	mills/kWh	\$142
Distribution Charges	\$8,451	62,677	MWh	134.83	mills/kWh	\$8,451
Franchise Fees & Other	\$369	62,677	MWh	5.89	mills/kWh	\$369
Energy Charge	\$4,562	62,677	MWh	72.79	mills/kWh	\$4,562
Subtotal	\$14,306					\$14,306

PGE Proposed Pricing

Functional Costs

Basic Charge						
Single-Phase		3	Customers	\$50.00	per cust. per summ. mo.	\$1
Three-Phase		1,346	Customers	\$50.00	per cust. per summ. mo.	\$404
Trans. & Rel. Serv. Charge		62,677	MWh	2.10	mills/kWh	\$132
Distribution Charge Calc						
First 50 kWh per kW		20,023	MWh	121.46	mills/kWh	\$2,432
Over 50 kWh per kW		42,655	MWh	111.46	mills/kWh	\$4,754
System Usage Charge Calc						
Franchise Fees & Other		62,677	MWh	5.05	mills/kWh	\$317
Cust Impact Offset		62,677	MWh	(55.19)	mills/kWh	(\$3,459)
System Usage Charge		62,677	MWh	(50.14)	mills/kWh	(\$3,143)
Energy Charge		62,677	MWh	67.31	mills/kWh	\$4,219
Reactive Demand Charge		11,083	kVar	0.50	kVar	\$6
Subtotal with Consumer Impact Offset						Revenue Target \$8,804

Staff Proposed Pricing

Functional Costs

Basic Charge						
Single-Phase		3	Customers	\$50.00	per cust. per summ. mo.	1
Three-Phase		1,346	Customers	\$50.00	per cust. per summ. mo.	404
Trans. & Rel. Serv. Charge		62,677	MWh	2.10	mills/kWh	132
Distribution Charge Calc						
First 50 kWh per kW		20,023	MWh	137.00	mills/kWh	2,743
Over 50 kWh per kW		42,655	MWh	127.00	mills/kWh	5,417
System Usage Charge Calc						
Franchise Fees & Other		62,677	MWh	5.05	mills/kWh	317
Cust Impact Offset		62,677	MWh	(76.27)	mills/kWh	(4,781)
System Usage Charge		62,677	MWh	(71.22)	mills/kWh	(4,464)
Energy Charge		62,677	MWh	73	mills/kWh	4,575
Reactive Demand Charge		11,083	kVar	0.50	kVar	0.0
Subtotal with Consumer Impact Offset						Revenue Target 8,808

Current Revenues (from Page 1 of Cody Exhibit 1402): \$7,829,234

Revenue Target = 1.125 times Current Revenues = \$8,807,888

Observation: Staff elevates energy and distribution charges to be close to functional cost and employs the CIO to bring the revenue target down to 12.5% above current revenues.

Source of Functional Cost Allocations and PGE-Proposed Pricing: PGE UE 294 Exhibit 1403, Cody, Page 5

**PORTLAND GENERAL ELECTRIC
SCHEDULE 38 FUNCTIONAL COST ALLOCATION AND RATE DESIGN
2016**

Schedule	Allocated Inputs (\$000)	Billing Determinants		Rate		Annual Revenue (\$000)
		Amount	Unit	Rate	Unit	
SCHEDULE 38						
Time-of-Day G.S. >30 kW						
Allocations						
Functional Costs						
Basic						
Single-Phase	76	66	Customers	\$95.74	per cust. per mo.	76
Three-Phase	827	482	Customers	\$143.04	per cust. per mo.	827
Trans. & Rel. Serv. Charge	72	39,036	MWh	1.84	per cust. per mo.	72
Distribution Charges	2,134	39,036	MWh	54.68	per cust. per mo.	2,134
Franchise Fees & Other	144	39,036	MWh	3.70	mills/kWh	144
Energy Charge	2,284	39,036	MWh	58.52	mills/kWh	2,284
Subtotal	5,538	= Staff's Target Revenues				5,538
Current Revenues (\$1000; from Page 1 of Cody Exhibit 1402):				5,250.6		

PGE Proposed Pricing						
Functional Costs						
Basic						
Single-Phase		66	Customers	\$25.00	per cust. per mo.	20
Three-Phase		482	Customers	\$25.00	per cust. per mo.	145
Trans. & Rel. Serv. Charge		39,036	MWh	2.10	mills/kWh	82
Distribution Charges		39,036	MWh	114.66	mills/kWh	4,476
System Usage Charge						
Franchise Fees & Other		39,036	MWh	5.05	mills/kWh	197
Cust Impact Offset		39,036	MWh	(44.45)	mills/kWh	(1,735)
System Usage Charge		39,036	MWh	(39.40)	mills/kWh	(1,538)
Energy Charge Calc						
On-Peak (special)		21,383	MWh	71.83	mills/kWh	1,536
Off-Peak		17,653	MWh	61.83	mills/kWh	1,091
Reactive Demand Charge		66,989	kVar	0.50	kVar	33
Subtotal					Target Revenues =	5,845
Implied Proposed Percentage Increase:				11.3%		

Staff Proposed Pricing						
Functional Costs						
Basic						
Single-Phase		66	Customers	\$25.00	per cust. per mo.	20
Three-Phase		482	Customers	\$25.00	per cust. per mo.	145
Trans. & Rel. Serv. Charge		39,036	MWh	2.10	mills/kWh	82
Distribution Charges		39,036	MWh	64.18	mills/kWh	2,505
System Usage Charge						
Franchise Fees & Other		39,036	MWh	5.05	mills/kWh	197
Cust Impact Offset		39,036	MWh	0.00	mills/kWh	-
System Usage Charge		39,036	MWh	5.05	mills/kWh	197
Energy Charge Calc						
On-Peak (special)		21,383	MWh	70.00	mills/kWh	1,497
Off-Peak		17,653	MWh	60.00	mills/kWh	1,059
Reactive Demand Charge		66,989	kVar	0.50	kVar	33
Subtotal					Target Revenues =	5,538
Implied Proposed Percentage Increase:				5.5%		

Observation: Compared to PGE's proposal, Staff brings the energy and distribution charges down close to their functional allocations, and at a level consistent with achieving the target revenues without relying upon the CIO.

Source of Functional Cost Allocations and PGE-Proposed Pricing: PGE UE 294 Exhibit 1403, Cody, Page 4

CASE: UE 294
WITNESS: GEORGE R. COMPTON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 305

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

PORTLAND GENERAL ELECTRIC
Commercial and Industrial Pricing: **UE 283**

	Allocated		Rate			Annual Revenue (\$000)
	Inputs (\$000)	Billing Determinants	Rate	Unit	Note	
Schedule 89 Facility Charges	\$4,189					
Under-recovery of other charges	\$3,255					
Total Facilities Revenues to Recover	\$7,444	4,501,188	\$1.65	per kW	faccap	\$7,427
Secondary						
First 4,000		48,000	\$1.97	per kW	faccap	\$95
Over 4,000		53,112	\$1.50	per kW	faccap	\$80
Primary						
First 4,000		1,296,000	\$1.94	per kW	faccap	\$2,514
Over 4,000		1,309,032	\$1.47	per kW	faccap	\$1,924
Subtransmission						
First 4,000		384,000	\$1.94	per kW	faccap	\$745
Over 4,000		1,411,044	\$1.47	per kW	faccap	\$2,074
						\$7,432

Source: The "Price-volt" tab of Ratespread15GRC folder within UE 283 PGE Exhibit 1400 workpapers.

PORTLAND GENERAL ELECTRIC
Commercial and Industrial Pricing: **UE 294**

	Allocated	Billing Determinants		Rate			Annual
	Inputs (\$000)	Amount	Unit	Rate	Unit	Note	Revenue (\$000)
Schedule 89 Facility Charges	\$4,050						
Under-recovery of other charges	\$327						
Total Facilities Revenues to Recover	\$4,378	4,557,428	kW faccap	\$0.96	per kW faccap		\$4,375
Secondary							
First 4,000		48,000	kW faccap	\$0.99	per kW faccap		\$47
Over 4,000		49,536	kW faccap	\$0.99	per kW faccap		\$49
Primary							
First 4,000		1,296,000	kW faccap	\$0.96	per kW faccap		\$1,244
Over 4,000		1,411,040	kW faccap	\$0.96	per kW faccap		\$1,354
Subtransmission							
First 4,000		384,000	kW faccap	\$0.96	per kW faccap		\$368
Over 4,000		1,368,852	kW faccap	\$0.96	per kW faccap		\$1,313
							\$4,376

Source: The "Price-volt" tab of UE 294 PGE Exhibit 1400 workpapers.

PORTLAND GENERAL ELECTRIC – UE 283
 RATE DESIGN INPUTS (CONTINUED)
 SUMMARY - ALLOCATION OF 2015 COSTS TO RATE SCHEDULES (\$000)

Grouping	Dist. Customer-Relate		Uncollectibles		Metering		Billing		Other Consumer		Subtotal		Fixed Costs	Subtotal	Total Cost Allocations
	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase			
Schedule 7	\$92,593	\$22	\$7,514	\$1	\$1,743	\$0	\$48,614	\$6	\$39,358	\$5	\$189,821	\$33		\$189,855	\$879,952
Schedule 15	\$244		\$24		\$0		\$138		\$76		\$482	\$0	\$1,997	\$2,479	\$3,751
Schedule 32	\$8,866	\$13,961	\$259	\$168	\$201	\$130	\$3,358	\$2,181	\$3,083	\$2,002	\$15,767	\$18,443		\$34,210	\$168,185
Schedule 38	\$17	\$453	\$0	\$1	\$2	\$24	\$4	\$37	\$4	\$42	\$28	\$557		\$584	\$5,715
Schedule 47	\$18	\$379	\$1	\$9	\$1	\$9	\$11	\$147	\$8	\$106	\$38	\$649		\$688	\$5,046
Schedule 49	\$1	\$381	\$0	\$21	\$0	\$8	\$0	\$91	\$0	\$51	\$1	\$552		\$553	\$15,835
Schedule 83															
Secondary	\$339	\$14,609	\$11	\$173	\$17	\$272	\$100	\$1,570	\$130	\$2,051	\$598	\$18,674		\$19,272	\$235,923
Schedule 85															
Secondary		\$3,000		\$36		\$89		\$858		\$2,650	\$0	\$6,631		\$6,631	\$6,631
Primary		\$442		\$4		\$10		\$101		\$311	\$0	\$868		\$868	\$171,140
Schedule 85 1-4 MW															
Secondary		\$441		\$11		\$3		\$46		\$681	\$0	\$1,182		\$1,182	\$1,182
Primary		\$235		\$11		\$4		\$47		\$696	\$0	\$993		\$993	\$67,693
Schedule 89 GT 4 MW															
Secondary		\$19		\$13		\$0		\$1		\$98	\$0	\$131		\$131	\$131
Primary		\$146		\$349		\$0		\$14		\$2,644	\$0	\$3,154		\$3,154	\$3,154
Subtransmission		\$183		\$104		\$0		\$4		\$784	\$0	\$1,074		\$1,074	\$75,906
Schedule 90-P		\$22		\$0		\$0		\$2		\$392	\$0	\$415		\$415	\$84,247
Schedules 91 & 95	\$1,656			\$0		\$0	\$98		\$120		\$1,874	\$0	\$7,796	\$9,669	\$17,260
Schedule 92		\$20		\$0		\$0		\$8		\$5	\$0	\$33		\$33	\$247
Totals	\$103,733	\$34,313	\$7,809	\$900	\$1,964	\$550	\$52,323	\$5,111	\$42,779	\$12,515	\$208,609	\$53,390	\$9,792	\$271,791	\$1,730,900

Source: PGE UE 283 Exhibit 1404, Cody, Page 2

PORTLAND GENERAL ELECTRIC – UE 294
 RATE DESIGN INPUTS (CONTINUED)
 SUMMARY - ALLOCATION OF 2016 COSTS TO RATE SCHEDULES (\$000)

Grouping	Dist. Customer-Related		Uncollectibles		Metering		Billing		Other Consumer		Subtotal		Fixed Costs	Subtotal	Total Cost Allocations
	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase			
Schedule 7	\$92,850	\$35	\$7,371	\$1	\$5,675	\$1	\$53,490	\$10	\$37,455	\$7	\$196,842	\$55		\$196,897	\$936,837
Schedule 15	\$252		\$61		\$0		\$140		\$100		\$553	\$0	\$1,706	\$2,260	\$3,606
Schedule 32	\$8,921	\$13,843	\$200	\$130	\$909	\$589	\$3,263	\$2,115	\$4,042	\$2,620	\$17,335	\$19,297		\$36,632	\$180,009
Schedule 38	\$18	\$402	\$0	\$0	\$15	\$110	\$12	\$86	\$31	\$230	\$76	\$827		\$903	\$5,538
Schedule 47	\$21	\$386	\$0	\$3	\$3	\$40	\$16	\$207	\$16	\$205	\$56	\$841		\$897	\$5,534
Schedule 49	\$1	\$354	\$0	\$4	\$0	\$31	\$0	\$96	\$1	\$295	\$2	\$779		\$781	\$14,306
Schedule 83															
Secondary	\$329	\$14,517	\$4	\$66	\$55	\$881	\$60	\$970	\$255	\$4,109	\$703	\$20,543		\$21,246	\$251,203
Schedule 85															
Secondary		\$3,543		\$48		\$323		\$283		\$2,498	\$0	\$6,696		\$6,696	
Primary		\$516		\$6		\$37		\$33		\$290	\$0	\$882		\$882	\$185,851
Schedule 85 1-4 MW															
Secondary		\$447		\$3		\$19		\$17		\$147	\$0	\$633		\$633	
Primary		\$280		\$3		\$19		\$17		\$149	\$0	\$468		\$468	\$72,499
Schedule 89 GT 4 MW															
Secondary		\$18		\$0		\$0		\$0		\$13	\$0	\$32		\$32	
Primary		\$155		\$0		\$0		\$5		\$364	\$0	\$523		\$523	
Subtransmission		\$187		\$0		\$0		\$1		\$108	\$0	\$296		\$296	\$67,149
Schedule 90-P		\$23		\$0		\$0		\$0		\$183	\$0	\$206		\$206	\$92,363
Schedules 91 & 95	\$1,466			\$0		\$0	\$244		\$70		\$1,780	\$0	\$5,592	\$7,372	\$13,450
Schedule 92		\$18		\$0		\$0		\$19		\$3	\$0	\$40		\$40	\$259
Totals	\$103,857	\$34,727	\$7,636	\$263	\$6,657	\$2,051	\$57,226	\$3,859	\$41,971	\$11,221	\$217,346	\$52,120	\$7,298	\$276,765	\$1,828,603

Source: PGE UE 294 Exhibit 1403, Cody, Page 2

CASE: UE 294
WITNESS: SUPARNA BHATTACHARYA

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 400

OPENING TESTIMONY

June 15, 2015

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Suparna Bhattacharya. I am a Senior Economist in the Energy
3 Rates Finance and Audits Division of the Public Utility Commission of Oregon
4 (OPUC). My business address is 3930 Fairview Industrial Dr. SE, Salem,
5 Oregon 97302.

6 **Q. Please describe your educational background and work experience.**

7 A. My Witness Qualification Statement is found in Exhibit Staff/401.

8 **Q. What is the purpose of your testimony?**

9 A. This testimony focuses on two contested issues. First, it presents a
10 recommended long run marginal generation cost model and shows the impact
11 of the model's results across all rate schedules. Second, it reviews and
12 provides recommendations on Portland General Electric's (PGE's or
13 Company's) residential sales forecast methodology.

14 **Q. Did you prepare an exhibit for this docket?**

15 A. Yes. I prepared the following Exhibits:

- 16 Exhibit Staff/401 Witness Qualification
- 17 Exhibit Staff/402 Wind-Direct Marginal Energy Cost
- 18 Exhibit Staff/403 Marginal Generation Cost with Wind Integration
- 19 Exhibit Staff/404 Marginal Energy Costs for each Schedule
- 20 Exhibit Staff/405 OPUC Data Responses for this testimony

21
22 **Q. How is your testimony organized?**

23 A. My testimony is organized as follows:

24 Issue 1, Marginal Generation Cost.....2

25 Issue 2, Residential Sales Forecast.....8

1 **Issue 1, Marginal Generation Cost**

2
3 **Q. Please describe the company's approach to estimate marginal**
4 **generation cost.**

5 A. The Company's marginal generation cost study takes into account the
6 renewable requirements of Renewable Portfolio Standard (RPS) policy by
7 including wind in the generation model, and estimates weighted capacity cost
8 and weighted marginal energy cost for the period 2016 through 2035, real
9 levelized at 2016 dollars.

10 Specifically, the fixed cost of an "F" class simple cycle combustion turbine
11 (SCCT) added with fixed gas cost transport¹ define the thermal capacity cost.
12 Consistent with the Company's 2013 IRP, 12 percent reserve requirement is
13 added to the SCCT thermal capacity cost. The fixed costs of a combined cycle
14 combustion turbine (CCCT) that are in excess of SCCT fixed costs comprise
15 the thermal marginal energy cost.

16 The derived thermal capacity cost is then combined with wind capacity cost
17 and weighted capacity cost is the average of these two costs, weighted by RPS
18 percentages for each year. To calculate wind capacity cost, PGE adds
19 Bonneville Power Administration's (BPA's) Variable Energy Resource
20 Balancing Service (VERBS) cost for integration service, thermal SCCT cost as
21 well as fixed gas transportation cost. So, for 15 percent RPS requirement,
22 weighted capacity cost can be expressed as:

¹ The November 2014 gas price forecast for the two hubs, Suma and AECO, is used for the cost study.

1 15% (wind capacity cost) + 85% (thermal capacity cost)

2 Weighted marginal energy cost is calculated by adding thermal marginal
3 energy cost with wind plant cost², weighted by RPS percentages for each year.

4 So, with 15 percent RPS, the Company's weighted marginal energy cost is:

5 15% (wind marginal energy cost) + 85% (thermal marginal energy cost).

6 **Q. Does Staff agree with the Company's marginal generation cost**
7 **approach?**

8 A. No. Staff does not agree with the Company's method of adding thermal SCCT
9 cost, fixed gas cost, and VERBS cost to calculate wind capacity cost, and
10 subsequently taking a weighted average of wind capacity cost and thermal
11 SCCT cost (based on RPS targets), to determine the weighted capacity cost.
12 Staff's position is that any \$/KW cost assigned to supplying wind power should
13 be considered as an energy cost. In both dockets UE 215 and 262, Staff has
14 objected to PGE's methodology to include wind as a portion of the capacity
15 cost in the marginal general cost model (see UE 283 Staff/800, Bhattacharya/3,
16 lines 6-9). For example, in UE 215, Staff's position was that any fixed costs
17 beyond the minimum required to achieve a given level of peak demand (SCCT)
18 should be classified as "energy" rather than "demand" costs (UE 215
19 Staff/1000, Ordonez/7, line 8).

20 **Q. Please describe Staff's recommended marginal generation cost model**
21 **for the current rate case- UE 294.**

² Wind plant costs include capital carrying cost, fixed O&M, and land rents.

1 A. Staff's analysis follows from the review of the Company's original filing,
2 accompanying workpapers, and the Company's responses to Staff's eleven
3 data requests. To effectively incorporate wind power in the marginal
4 generation cost model, Staff considers Port Westward 2 (PW2) as a flexible
5 generating resource to offset random fluctuations associated with wind
6 generation and derives the incremental energy cost associated with wind
7 integration. The following steps describe Staff Exhibit 403, and details Staff's
8 long run marginal generation cost model with wind integration for the time
9 period 2016 through 2035.

10 1. Column C, shows Staff's thermal capacity cost in \$kW-year. It is calculated
11 as the sum of PGE's estimated thermal capacity SCCT cost (Column A) and
12 SCCT fixed gas transport cost (Column B). Inclusion of fixed gas transport
13 cost follows from the UE 215 rate case in which this was accepted by Staff.³
14 Staff's thermal capacity cost is independent of RPS requirements and
15 expressed as:

16 (Thermal SCCT capacity cost + Fixed gas transport cost).

17 2. Column D, shows the flexible thermal resource cost, i.e., the cost of PW2 in
18 \$/KW-year. Staff calculated this cost based on PGE's response to Staff
19 Data Request No. 434 (a).

20 3. Staff then estimated the incremental flexible resource cost by taking the
21 difference between flexible thermal resource cost and thermal capacity

³ See UE 215 Staff/1000-Ordonez/7, line 9.

- 1 SCCT cost. The incremental cost in \$/KW-year as shown in Column E is:
2 $(PW2 \text{ cost} + \text{fixed gas cost}) - (\text{SCCT cost} + \text{fixed gas cost})$
- 3 4. Column F, calculates the incremental cost in dollars for the flexible thermal
4 resource capacity of 220 MW.
- 5 5. Column G, shows the incremental flexible resource per-wind-unit cost in
6 \$/MWh. Staff estimated this cost by considering incremental flexible
7 resource cost over 2016 annual wind generation from Biglow and Tucannon
8 wind farms. Staff collected the 2016 wind generation in MWh from the
9 Company's response to OPUC Data Request No. 344 (a).
- 10 6. Column H, shows the wind-direct marginal energy cost. Staff estimated
11 wind-direct energy cost in \$/MWh using the Company's capital carrying
12 costs, corrected land rent value (as provided in PGE's response to OPUC
13 Data Request No. 319 (b)⁴), and the company's estimated fixed O&M costs.
14 Staff Exhibit 402 reports the calculated wind direct marginal energy cost.
- 15 7. Column I, calculates the total wind marginal energy cost in \$/MWh. Wind-
16 direct marginal energy cost is added to incremental flexible resource per-
17 wind-unit cost to generate total wind marginal energy cost.
- 18 8. Column J, includes the thermal marginal energy cost, as calculated by the
19 Company, and Column K shows the RPS percentages.

⁴ PGE's response to OPUC Date Request No. 319 (b) provides the corrected land rent value for the Tucannon wind farm in 2016\$, and Staff used this corrected value to estimate wind-direct marginal energy cost. Staff's estimated wind-direct marginal energy cost is lower than that filed in the current docket.

1 9. Column L, is the weighted marginal energy cost in \$/MWh. Staff derived
2 weighted marginal energy cost based on RPS percentage requirements. So
3 for 15% RPS, for example, weighted marginal cost is given as:
4 15% (total wind marginal energy cost) + 85% (thermal marginal energy
5 cost).

6 10. Finally, marginal capacity cost and weighted marginal energy costs were
7 levelized in 2016 dollars.

8 **Q. Please explain why Staff did not consider BPA VERBS cost in marginal**
9 **generation cost analysis.**

10 A. Staff's proposal considered PW2 as a flexible resource, assumed that PW2
11 has sufficient flexible thermal capacity to support PGE's entire annual wind
12 generation, and marginal energy cost was derived in a similar fashion as
13 described in the current testimony (UE 283 Staff/800-Bhattacharya/5-9).

14 Moreover, from OPUC Data Request No. 435, Staff understands that PGE's
15 reliance on BPA services for wind integration, post September 2017, remains
16 uncertain⁵, and that the Company will assess various least cost alternatives in
17 the long run, including using its own flexible resources for integrating wind.

18 Finally, given that Staff has included the cost of the variable capacity resource
19 in the wind integration model, including BPA VERBS might result in double
20 counting of incremental energy cost associated with wind.

21 **Q. Have you prepared an exhibit to show Staff's wind-direct marginal**
22 **energy cost estimation?**

⁵ PGE elected 30/15 BPA VERBS schedule from October 1, 2015 through September 30, 2017

1 A. Yes. As explained above, Exhibit 402 shows the wind-direct marginal energy
2 cost levelized in 2016\$.

3 **Q. Have you prepared an exhibit to show long run marginal generation**
4 **cost with wind integration?**

5 A. Yes. As mentioned above, Exhibit 403 shows the results derived from Staff's
6 marginal generation cost study for the period 2016 through 2035.

7 **Q. Have you prepared an exhibit to show the impact of wind power on**
8 **marginal energy costs across rate schedules for the 2016 test year?**

9 A. Yes. Exhibit 404 shows the marginal energy cost allocation for each rate
10 schedules for the current test period 2016. Marginal energy cost allocation
11 based on Staff's model is only illustrative, as PGE will update its marginal
12 energy cost values with corrected wind plant cost in its reply testimony (see
13 PGE response to OPUC Data Request No. 319 (b)).

14 **Q. Have you prepared an exhibit to show the data responses utilized for**
15 **Staff's marginal cost analysis?**

16 A. Yes. Exhibit 405 attaches all data responses utilized for this testimony.

17 **Q. What is Staff's recommendation to the Commission on marginal**
18 **generation cost?**

19 A. Staff recommends that the Commission adopt Staff's proposed long run
20 marginal generation cost model and results, as presented in Exhibit 403.
21 Staff's model appropriately assigns capacity and energy costs with wind
22 integration, and marginal energy costs are effectively allocated across all rate
23 schedules.

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Issue 2, Residential Sales Forecast

Q. Please summarize the Company's sales forecast for residential customers.

A. The Company's sales forecast for the test year 2016 is 7625 thousand MWh. Forecast for the previous five years shows that the growth in energy sales is below one percent for the residential customers.

Q. Please give an overview of the Company's forecasting models that generated the 2016 sales forecast.

A. The Company has developed seven residential sales forecasting models (Schedule 7), based on dwelling and heating categories. The base sales forecast model is the product of use per customer (UPC) and the number of customers. For each residential customer group, the Company developed an econometric model for UPC. Specifically, the Company used linear regression models to quantify the relationship between UPC and the driving factors. The main set of inputs or explanatory variables include weather, seasonal, intervention, and economic drivers such as unemployment.

Finally, the base sales forecast for each group is adjusted to account for price and energy efficiency savings. The price effect adjusts the baseline sales forecast to account for the response to higher prices. First, the sales reduction is calculated by multiplying each group's real price change percent with the group's elasticity, and then this adjustment is deducted off of the base sales forecast to get price adjusted forecast. Energy efficiency adjustment captures

1 the impact of Senate Bill 838 efficiency savings forecasted by Energy Trust of
2 Oregon (ETO). The ETO's forecast for 2015 and 2016 energy efficiency
3 measures is shaped into monthly incremental savings. The monthly
4 incremental savings are aggregated into monthly cumulative energy savings
5 and then allocated to each residential forecast group based on a historic
6 pattern. The forecast group's cumulative energy efficiency savings are then
7 removed from the group's price adjusted forecast.

8 The final load for Schedule 7 customers is the sum of total sales generated
9 from each customer groups after adjusting for both price and energy efficiency.

10 The final sales forecast for a customer group (r) with post estimation
11 adjustments at a specific point of time (t) can be written in equation form as:

$$12 \text{ Sales}_t = \sum_{rt} [(UPC_{rt} \times \text{Customers}_{rt}) - \text{Price Adjustment}_{rt} - \text{Energy Efficiency Adjustment}_{rt}].$$

13 **Q. Please explain Staff's approach to analyze the sales forecast for**
14 **residential groups.**

15 A. Staff has reviewed the Company's filing, workpapers, and responses to Staff's
16 three data requests for this analysis. Staff's approach to evaluate the test year
17 sales forecast involves the following steps:

18 **a. Review of the Company's model and identification of issues**

19 Staff first reviewed the Company's baseline energy use per customer
20 regression models and sales forecast for each residential group (before
21 price and energy efficiency adjustments) for the sample size January 2004
22 through October 2014.

1 The major concern, also raised in the last rate case (see UE 283
2 Exhibit Staff/300, Kaufman/12), is the methodology PGE used to evaluate
3 the price impact on residential sales forecast. As mentioned above, the
4 Company performs post-estimation adjustments to account for price effects.
5 The base UPC models are thus, subject to omitted variable bias. The
6 coefficients of the explanatory variables correlated to price also capture the
7 price effect and with external price adjustments, forecasting models double
8 count the effect of price.

9 PGE's response to OPUC Data Request No. 381 indicates that the
10 Company calculated price elasticities for each residential group by
11 considering regression model specifications used in the September 2013
12 load forecast model. Specifically, the Company developed an elasticity
13 model by including price in the 2013 UPC regression models and
14 incorporated the model estimates in current base models to forecast the
15 2016 demand under fixed and 10 percent increase in price. The percent
16 change in sales generated from a 10 percent increase in price is then
17 divided by 10 percent to get the elasticity numbers. These price elasticities
18 are multiplied with the real price change and the resulting sales adjustment
19 is removed from the base sales forecast to generate price-adjusted 2016
20 sales.

21 Staff finds that the 2013 UPC regression model specifications as well
22 as the sample size, used to estimate elasticities, are much different from the
23 current base model specifications. In other words, the 2013 regression

1 models include many regression variables not included in the current base
2 UPC regression models. Staff views the elasticity estimation process as an
3 additional step and it is not required if price is directly included in the model.

4 **b. Staff's Evaluation of the Price Issues**

5 **i. Model Specification and Estimation**

6 To evaluate the aforementioned price issues, Staff developed
7 alternate linear regression UPC models with price, seasonal,
8 weather, economic indicators, and autoregressive terms as
9 independent variables for the residential forecast groups. Staff used
10 the Company's data provided through Eviews file SDEC 2014
11 (energy models) for regression analysis. Standard economic theory
12 states (and is typically termed the "law of demand") that as price per
13 kilowatt hour (KWh) rises, energy usage decreases. Staff estimated
14 and analyzed the coefficient and significance of the price variable for
15 all baseline models and also examined the consistency of other
16 model parameters such as weather (included heating degree days
17 (HDD) and cooling degree days (CDD)), seasonal and economic
18 indicator (included unemployment) from a theoretical and statistical
19 standpoint. Price coefficients for all models were of the "right" sign
20 being negative and significant for most models. Model specifications
21 of Staff's baseline UPC models were chosen based on the lowest
22 Akaike Info Criterion (AIC) values and significance of the parameter
23 estimates. Staff's final sales forecast for a customer group (r) with

1 post estimation adjustment at a specific point of time (t) can be
2 written in equation form as:

$$3 \text{ Sales}_t = \sum_{rt} [(UPC_{rt} \times \text{Customers}_{rt}) - \text{Energy Efficiency Adjustment}_{rt}].$$

4 **ii. Model Performance**

5 Second, to evaluate model performance, Staff measured how well
6 model predictions fit out-of-sample data or the data that was not used
7 to estimate the model's parameters. To perform this test, Staff first
8 fitted the baseline UPC models to data from January 2004 through
9 December 2013 (the in-sample-period), and treated January 2014
10 through October 2014 as the out-of-sample period.⁶ Next, using the
11 Company's customer count forecasts, baseline sales forecast for all
12 residential groups is generated for the out-of-sample period.

13 Finally, to estimate the effects of energy efficiency savings from SB
14 838, Staff generated incremental energy efficiency savings data for
15 the out-of-sample period using the efficiency data provided as a
16 response to OPUC Data Request No. 437. The energy savings were
17 deducted off of the total sales from Staff's baseline model to generate
18 the final sales forecast.

19 To measure model fit, Staff calculated the Root Mean Squared
20 Error (RMSE)⁷ for each residential forecast models and compared
21 this accuracy measure across Staff's and the Company's final sales

⁶ For robustness checks, Staff is still analyzing alternative out-of-sample time periods.

⁷ RMSE is the square root of the average of the square of residuals, where residual is calculated as the difference between actual sales and Staff's predicted sales.

1 forecast. The lower the value of RMSE, the better is the model
2 performance. Staff collected the Company's final sales forecast
3 (price and energy efficiency adjusted) from the Company's filed
4 workpaper, 5-SDEC14E Tables (2013 to 2016), for the out-of-sample
5 period.

6 **iii. Results**

7 Results indicate that for most cases, Staff's models have lower
8 RMSE and hence, perform better than the Company's sales forecast
9 models. Table 1 compares the Staff's models with the Company's
10 residential energy models based on RMSE.

11 Staff's proposal to include price directly in the econometric
12 model is consistent with the standard industry practice. From the
13 Company's response to OPUC Data Request No. 223, Staff identifies
14 that only 5% (0%) of the total utilities surveyed in North America
15 (West) account for price impact considering price variable outside the
16 residential load forecasting models.

17 **Table 1: Comparison of out-of-sample model performance**

Actual sample: 2000M01 2013M12					
Forecast sample: 2014M01 2014M10					
<u>Models</u>	<u>Staff</u>	<u>Company</u>	<u>Models</u>	<u>Staff</u>	<u>Company</u>
<u>ESFSH</u>			<u>EMFSH</u>		
RMSE	5731	8415	RMSE	4306	9756
Price	(-)*	NA	Price	(-)*	NA
<u>EMFNH</u>			<u>ESFNH</u>		
RMSE	552	752	RMSE	10000	6749
Price	(-)	NA	Price	(-)	NA
<u>EMHSH</u>			<u>EMHSH</u>		
RMSE	77	179	RMSE	1325	2399
Price	(-)	NA	Price	(-)*	NA
<u>EOTH</u>					
RMSE	200	161			
Price	(-)**	NA			

* , ** , and *** indicate 1%, 5%, and 10% significance levels

ESFSH and EMFSH – space heat usage of single family and multi-family households
ESFNH and EMFNH – non-space heat usage of single family and multi-family households
EMHSH and EMHSH – non-space and space heat usage of mobile family households
EOTH – energy usage from residential others, mainly houseboats

1 **Q. DOES STAFF HAVE ANY REVENUE ADJUSTMENTS?**

2 A. Staff is still working on final sales forecast numbers and currently does not
3 have any specific revenue requirement adjustments to propose. If a specific
4 adjustment is determined after further review and analysis, Staff will propose
5 an adjustment. However, it should be recalled that the Company's load
6 forecast is not final until much later this year as the Company will be continuing
7 to update certain data.

8 **Q. Does this conclude your testimony?**

9 A. Yes.

CASE: UE 294
WITNESS: SUPARNA BHATTACHARYA

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 401

Witness Qualification Statement

June 15, 2015

WITNESS QUALIFICATIONS STATEMENT

NAME: SUPARNA BHATTACHARYA

EMPLOYER: PUBLIC UTILITY COMMISSION OF OREGON

TITLE: SENIOR ECONOMIST
RATES, FINANCE & AUDIT

ADDRESS: 3930 FAIRVIEW INDUSTRIAL DR. SE
SALEM, OREGON 97302-1166

EDUCATION: Ph.D. Agricultural Economics
University of Nebraska, Lincoln
Specialization: Industrial Organization,
Environmental & Natural Resource Economics,
Production and Development Economics

M.S. Agricultural Economics
University of Nebraska, Lincoln
Specialization: Statistics, Econometrics

B.A. Economics
Sambalpur University, India
Specialization: Mathematical Economics

EXPERIENCE: I have been employed by the Public Utility Commission of Oregon since April, 2014, with my current position being a Senior Economist, in the Utility Program's Energy - Rates, Finance and Audit Division. My current responsibilities include reviewing sales forecast, long run marginal generation and transmission costs, decoupling mechanism, revenue requirements, and tariff verification.

CASE: UE 294
WITNESS: SUPARNA BHATTACHARYA

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 402

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

STAFF EXHIBIT 402
IS CONFIDENTIAL AND SUBJECT TO PROTECTIVE
ORDER NO. 15-036 IN UE 294

CASE: UE 294
WITNESS: SUPARNA BHATTACHARYA

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 403

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

STAFF EXHIBIT 403
IS CONFIDENTIAL AND SUBJECT TO PROTECTIVE
ORDER NO. 15-036 IN UE 294

CASE: UE 294
WITNESS: SUPARNA BHATTACHARYA

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 404

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

STAFF EXHIBIT 404
IS CONFIDENTIAL AND SUBJECT TO PROTECTIVE
ORDER NO. 15-036 IN UE 294

CASE: UE 294
WITNESS: SUPARNA BHATTACHARYA

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 405

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

March 25, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 223
Dated March 12, 2015**

Request:

Page three of the Company's UE 294 load forecast testimony (exhibit 1200) states that the price elasticity estimates used by the company are "consistent with price elasticities estimated for the Northwest". Please provide a citation or materials to support this claim.

Response:

Attachments 223-A and 223-B provide price elasticities in the Pacific Northwest region showing the reasonableness of PGE's price elasticities. Attachment 223-A was submitted by Western Public Agency Group (WPAG) as a data response in the 2003 Bonneville Power Administration (BPA) Rate Hearing. This study shows historic estimates of price elasticities on page 2 and 2003 price elasticities for WPAG utilities by customer class on page 3.¹ Attachment 223-B is a presentation summarizing the work of Joutz and Costello (2005) and contains regional elasticity estimates on pages 13 and 14.²

Attachment 223-C provides the Itron Benchmark study (2006) finding that PGE's price elasticities are within the bounds of industry estimates (listed on page 3 and on figures 3-4 of the attachment).

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¹ Attachment 223-A can be access online at: https://www.bpa.gov/power/lp/sn03/files/Parties_Data_Responses/

² Attachment 223-B can be access online at: <http://www.iaee.org/documents/denver/Joutz.pdf>

UE 294

Attachment 223-A

Provided in Electronic Format only

WPAG Price Elasticity Study
CR-WA-004A

UE 294

Attachment 223-B

Provided in Electronic Format only

Regional Short-Term Elasticity Consumption Models

UE 294

Attachment 223-C

Provided in Electronic Format only

Price Effects Benchmarking Study

April 1, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 319
Dated March 20, 2015**

Request:

Please refer to LRMC gen_CONF file associated with the PGE Work Papers_1300_CONF.

- a. Tab "Unit MC " shows marginal energy and capacity costs for the test year 2016. Column D of this spreadsheet shows BPA Variable Energy Resource Balancing Services (VERBS) costs in \$KW-year from 2016 - 2035. Are these costs based on BPA's 30/15 committed scheduling? Please provide the electronic spreadsheet (with cell references and formulae intact) showing the calculation of BPA VERBS cost for the test year 2016.
- b. Tab "Wind Plant 2016" shows the allocated costs of the Tucannon River Farm. Column M calculates Variable O&M cost of the wind farm based on land rents. Please explain the reasons for considering land rents as variable O&M cost. Please provide an electronic spreadsheet (with cell formulae intact) showing the calculation of the land rents, as reported in Row 31 of tab "Wind Plant 2016".

Response:

- a. The BPA VERBS costs included in the cost study are based on BPA's 30/60 Committed Scheduling. See page 2 of Attachment 319-A for the total price of \$1.20 per kW-month as provided by BPA. The calculation in Column D as referenced in this request is used to express the amount on in dollars per kW-year and escalates the amount to the appropriate year.

- b. Land rents are considered variable O&M costs because the contracts with landowners specify that PGE will pay rents based on the actual production of the Tucannon River Wind Farm. Upon review, it appears that the land rent figure used in PGE's initial filing was not updated from the generation marginal cost results used in PGE's last general rate case, Docket No. UE 283. The land rent cost in 2016 dollars should be \$3.12/MWh. PGE expects to correct these costs in its reply testimony. For the land rent calculation, please refer to the MONET output file "#TucannonLandOwnerRoyalty_2015_FACalc.xlsx", worksheet "Tucannon".

The file is located in the "Volume 7 – Wind\Tucannon\Royalty Payments" directory of the Minimum Filing Requirements (MFR) documentation filed on February 27, 2015, in Docket No. UE 294.

UE 294

Attachment 319-A

Provided in Electronic Format only

April 13, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 344
Dated March 31, 2015**

Request:

Please refer to “Biglow & Tucannon 2014” tab of the confidential attachment “OPUC_DR_212_Attach A_CONF.xlsx” that was provided by PGE in response to OPUC Data Request No. 212.

- a. Column Z of Row 15 shows VERBS cost in \$/MWh for the year 2014. Please provide the electronic worksheet (with cell references and formulae intact) showing the calculation of the VERBS cost in \$/MWh for the years 2015 and 2016.
- b. The VERBS cost in \$/MWh, shown in Row 15 considers wind generation from PGE owned Biglow and Tucannon wind farms (Rows 12 and 13). Please explain why PGE is not including wind power from contracts- Vansycle Wind and Klondike Wind for estimating the VERBS cost. Are these wind farms located in BPA’s balancing authority?

Response:

- (a) Attachment 344-A contains the total annual 30/15 BPA VERBS rate converted to \$/MWh using PGE’s 2015 General Rate Case (GRC) final MONET forecasted generation and PGE’s 2016 GRC April 1 update MONET forecasted generation.

BPA began offering VERBS as a tariffed service in October 2009. Beginning in 2009, PGE purchased the VERBS 30/60 committed scheduling option. Beginning in 2012, BPA offered a committed intra hour (CIH) pilot program for VERBS customers. The

CIH pilot required participants to schedule wind using a 30/30 scheduling metric and provided participants with credit to their regular VERBS expenses. PGE participated in the CIH pilot during 2012 through the end of the pilot in 2013. After the end of the CIH pilot, PGE returned to using the VERBS 30/60 committed scheduling. For the BPA rate period beginning in October 2015, PGE has elected to participate in VERBS 30/15 committed scheduling.

Attachment 344-A is confidential and subject to Protective Order No. 15-036.

- (b) The Vansycle and Klondike II wind facilities are physically located within the BPA control area. PGE does not include Vansycle and Klondike II for estimating the VERBS cost because PGE does not purchase VERBS for either facility. For the Vansycle and Klondike II power purchase agreements (PPAs), PGE receives a flat hourly delivery from the owners of the facilities and does not purchase VERBS for these facilities.

UE 294

Attachment 344-A

Provided in Electronic Format only

Confidential and Subject to Protective Order No. 15-036

VERBS Cost Estimate

April 21, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 381
Dated April 9, 2015**

Request:

Please refer to the PGE Workpapers_1200_CONF related to load forecast:

- a. **Regression estimates for the base (B) models are reported in Final Models of the 12-Regressions_CONF. Regression estimates for the price-effect (P) models are shown in the SSEP13 price elasticity model specifications_CONF.pdf file of the 19-Price Elasticity Work Papers_CONF. Please explain in detail and provide all statistical tests performed for considering different time periods for B and P forecast models. Please provide an explanation that separately addresses Residential, Commercial and Industrial classes.**
- b. **Pages 18-22 of the SSEP13_Model_Price_Elasticity_CONF.pdf file in the folder 19-Price Elasticity Work Papers_CONF show SAS codes that calculate residential use per customer by dwelling and heating type using regression coefficients generated from the P model (shown in Eviews file “ssep2013_price_elasticity.wf1” and pdf file SSEP13 price elasticity model specifications_CONF.pdf). SAS codes show that some independent variables of the P model are not included for calculating energy use per customer. Please provide the reasons for excluding some explanatory variables from the energy use per customer calculation?**

Response:

- a. PGE performed its most recent price elasticity study in the third quarter of 2013. It is provided with the initial filing as part of confidential work papers in folder 19- Price Elasticity Work Papers. The elasticities in the price change adjustment model (“P” forecast) were calculated utilizing energy regression model specifications consistent with those used in the September 2013 load forecast model. PGE’s typical forecast process does not include an update to the price elasticity study. PGE uses this approach since it has found price elasticities to be stable over time; therefore the elasticity study update is only performed periodically. The price elasticity study calculates elasticities, not models for use in the price adjustment model; therefore there are no tests between equations used in the price elasticity study and future forecasts. All classes are subject to the same approach.
- b. As explained above the price elasticity study utilized regression models with explanatory variables consistent with forecast models used at the time the study was performed.

May 8, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 434
Dated April 24, 2015**

Request:

Please refer to UE 294/PGE/1400 Macfarlane - Werner confidential work paper “LRMC gen_CONF.xlsx”.

- a. Please provide a modified version of this work paper with the combined cycle combustion turbine inputs and any other pertinent data replaced with Port Westward 2 inputs.**
- b. Please provide the worksheet that shows the marginal capacity cost of Port Westward 2 in \$/KW-year used in the marginal generation cost study in Docket UE 283.**

Response:

- a. Please see Confidential Attachment 434-A for the modified version of the requested work paper. In preparing this response, PGE replaced the following SCCT inputs with estimates for Port Westward 2:

Economic life, salvage value, capital costs, installed capacity, fixed O&M, variable O&M, heat rate, and availability factor. PGE left other inputs and assumptions unchanged.

In addition, VERBS¹ costs are removed.

¹ Variable Energy Resource Balancing Service

- b. PGE did not use the marginal capacity cost of Port Westward 2 in its marginal generation cost study in Docket No. UE 283. However, PGE provided a response to a similar data request in Docket No. UE 283 (i.e., OPUC Data Request No. 299), provided as Attachment 434-B and Confidential Attachment 434-C.

Attachments 434-A and 434-C are confidential and subject to Protective Order No. 15-036.

UE 294

Attachment 434-A

Provided in Electronic Format only

Confidential and subject to Protective Order No. 15-036

Generation Marginal Cost Study with PW2 Inputs

UE 294

Attachment 434-B

Provided in Electronic Format only

UE 283 PGE Response to OPUC Data Request No. 299

UE 294

Attachment 434-C

Provided in Electronic Format only

Confidential and subject to Protective Order No. 15-036

UE 283 PGE Response to OPUC Data Request No. 299
Attachment 299-A

May 8, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 435
Dated April 24, 2015**

Request:

Please refer to tab “Unit MC” of the UE 294/PGE/1400 Macfarlane - Werner confidential work paper “LRMC gen_CONF.xlsx”. Please explain PGE’s plans on self-integrating wind in the next ten years.

Response:

PGE continues to implement its step-wise approach towards full self-integration of wind. By electing Bonneville Power Administration’s (BPA) 30/15 committed scheduling VERBS¹ rate, PGE moved a step closer to full self-integration. Beginning October 1, 2015, PGE will use its thermal and hydro resources to manage the intra-hour variability of its wind resources on a 15-minute basis (i.e., 15-minute schedule-to-schedule). In order to fully self-integrate its wind resources, PGE would need to also manage the moment-to-moment and within-schedule changes in wind (just as it presently does for load).² PGE’s plans for full self-integration are contingent on several factors.

- PGE’s next opportunity to elect full self-integration of its entire wind fleet is the next BPA rate period, which begins October 1, 2017. As PGE nears the VERBS election window (the timing of which BPA has not yet established) it will assess its alternatives and identify the least-cost and least-risk option for integrating wind resources (and other variable energy resources, if applicable).

¹ Variable Energy Resource Balancing Service

² BPA currently provides moment-to-moment regulation service and following service needed to integrate the difference between the 15-minute schedule and actual output of a facility.

- PGE is presently working to prepare to participate in a within-hour market. Rather than relying solely on PGE's system resources for full self-integration, PGE's participation in a within hour market could prove to be a cost-effective method to assist PGE in fully self-integrating variable energy resources. PGE is presently assessing its within-hour market options, including the efforts of the Northwest Power Pool (NWPP) Market Assessment and Coordination Committee (MC) Initiative and the California Independent System Operator Energy Imbalance Market (CAISO EIM). PGE anticipates sharing the results of its assessment during the fourth quarter of 2015. In addition to the assessment described above, PGE is implementing several projects (e.g., software additions and metering upgrades) that are needed to participate in an automated within-hour market.
- PGE is developing internal tools used for wind forecasting and scheduling. This effort will produce a robust wind forecast necessary for PGE to reliably manage its portfolio under full self-integration.

PGE will continue to develop its internal tools for wind forecasting and scheduling and analyze options offered by BPA and regional within-hour markets as we approach the 2017 selection window.

With respect to PGE's generation marginal cost study in Docket No. UE 283, PGE expressed that VERBS from BPA is an objective, verifiable cost that PGE and others currently incur to integrate wind resources (see PGE Exhibit 2100 in Docket No. UE 283). PGE used VERBS in the generation marginal cost study in this docket for the same reason. In addition, the parties stipulated to use VERBS in the marginal cost study in UE 283 and final prices reflected that agreement.

May 8, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 437
Dated April 27, 2015**

Request:

Please provide the load forecast energy efficiency work papers showing the incremental and cumulative energy efficiency adjustments by forecast group from the final load forecasts filed in UE-283 (for 2015), UE-262 (for 2014), and Annual Update Tariff filings for the prompt years 2009 to 2013.

Response:

Attachment 437-A provides PGE's forecasted cumulative monthly energy efficiency savings in megawatt-hours (MWh) by forecast group and by forecast vintage for 2009 to 2015. PGE calculates the cumulative forecasted energy efficiency from the forecasted monthly incremental savings prior to the forecast group allocation; therefore the forecasted incremental savings are only available by aggregated residential, commercial and manufacturing groupings.

Attachment 437-B shows the incremental and cumulative monthly energy efficiency savings by forecast for residential, commercial and manufacturing prior to the allocation. The forecasted cumulative energy efficiency savings is allocated to forecast groups using the forecast group share of energy deliveries for their respective residential, commercial and manufacturing groups.

Attachments 437-C through 437-I contain the SAS code for the calculation of the incremental and cumulative energy efficiency for each provided forecast.

UE 294

Attachment 437-A

Provided in Electronic Format only

PGE Cumulative Monthly Energy Efficiency Savings in MWh by
Forecast Group for 2009-2015

UE 294

Attachment 437-B

Provided in Electronic Format only

PGE Incremental and Cumulative Monthly Energy Efficiency Savings in
MWh by Residential, Commercial and Manufacturing Groups for 2009-
2015 forecasts

UE 294

Attachment 437-C

Provided in Electronic Format only

SAS Code

UE 294

Attachment 437-D

Provided in Electronic Format only

SAS Code

UE 294

Attachment 437-E

Provided in Electronic Format only

SAS Code

UE 294

Attachment 437-F

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SAS Code

UE 294

Attachment 437-G

Provided in Electronic Format only

SAS Code

UE 294

Attachment 437-H

Provided in Electronic Format only

SAS Code

UE 294

Attachment 437-I

Provided in Electronic Format only

SAS Code

CASE: UE 294
WITNESS: ROBERT FONNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 500

OPENING TESTIMONY

JUNE 15, 2015

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Robert Fonner. I am employed as a Senior Economist in the Utility
3 Program's Energy - Rates, Finance and Audit Division. My business address
4 is 3930 Fairview Industrial Dr. SE, Salem, Oregon 97302.

5 **Q. Please describe your educational background and work experience.**

6 A. My Witness Qualification Statement is found in Exhibit Staff/501.

7 **Q. What is the purpose of your testimony?**

8 A. This testimony presents my analysis and recommendations regarding Portland
9 General Electric's (PGE's or Company's) non-residential customer sales
10 forecast and marginal customer cost study.

11 **Q. Which issues remain contested for which you are responsible?**

12 A. The non-residential customer sales forecast and customer marginal cost
13 remain contested. I am not responsible for any of the issues included in the
14 partial stipulation.

15 **Q. Are you investigating any other issues as a part of this general rate
16 case?**

17 A. Yes. Staff is also looking into the cost of replacing smart meters and the
18 monthly costs to read the replacement meter. However, Staff's analysis of this
19 issue is still in the discovery phase and Staff does not have an adjustment at
20 this time.

21 **Q. Did you prepare an exhibit for this docket?**

22 A. Yes. I prepared the following exhibits:

23 Exhibit Staff/501 Witness Qualification

- 1 Exhibit Staff/502 Data Request Responses
- 2 Exhibit Staff/503 Forecast of paperless billing shares
- 3 Exhibit Staff/504 Customer Marginal Cost Adjustment
- 4
- 5

6 **Q. How is your testimony organized?**

7 A. My testimony is organized as follows:

8	Issue 1, NON-RESIDENTIAL CUSTOMER SALES AND LOAD	
9	FORECAST.....	4
10	<i>PURPOSE OF SALES AND LOAD FORECAST</i>	4
11	<i>THE COMPANY’S FORECAST AND METHODOLOGY</i>	4
12	<i>BASE FORECAST</i>	5
13	<i>ENERGY EFFICIENCY ADJUSTMENT</i>	10
14	<i>PRICE ADJUSTMENT</i>	6
15	Issue 2, CUSTOMER MARGINAL COST	13
16	Issue 3, MAILING BUDGET.....	15

17 **Q. Please summarize Staff’s analysis and recommendations regarding**
18 **each issue identified above.**

19 A. A summary of my analysis follows:

- 20
- 21 1. Non-residential Customer Sales and Load Forecast: After reviewing
- 22 PGE’s forecasting methodology, staff concludes that price effects are not
- 23 effectively captured by the Company’s current modeling strategy. Staff
- 24 proposes dropping the price adjustment from the forecast in this rate case.
- 25 Moving forward, Staff will work with PGE to develop a method that more
- 26 appropriately captures the effects of price in the non-residential sales
- 27 forecast.
- 28 Staff also reviewed PGE’s treatment of energy efficiency in the forecasting
- 29 models. Staff believes that PGE’s current methodology double-counts

1 energy efficiency effects. Staff proposes alternative methodologies for
2 incorporating energy efficiency and will work with the Company to develop
3 and test these models.

4 Removing the external price adjustment from the Company's non-
5 residential customer forecasting model, as is being recommended by Staff
6 in the current rate case, will lead to an adjustment to test year revenues.

7 The magnitude of the revenue adjustment will depend on the PGE's final
8 base forecasting model.

- 9 2. Customer Marginal Cost: Staff proposes that PGE's marginal cost study
10 should incorporate trends in the adoption of paperless billing. This
11 adjustment shifts some costs from residential to non-residential
12 customers.

13 PGE's customer marginal cost study includes a number of new cost
14 categories that were not included in previous rate cases. Staff does not
15 object to these new cost categories in the current rate case, with the
16 caveat that a review of the suitability of the inclusion of these costs is
17 ongoing.

- 18 3. Mailing Expense Forecast: Staff's initial findings include a projection that
19 the Company will send fewer mailings in 2016 compared to 2014 due to
20 the rate at which paperless billing is adopted. However, mailing expense
21 may increase. Analysis of this issue is ongoing.

Issue 1, NON-RESIDENTIAL CUSTOMER SALES AND LOAD FORECAST*PURPOSE OF SALES AND LOAD FORECAST***Q. What is the non-residential load forecast used for in this rate case?**

A. The forecast is fed into marginal cost studies that allocate the Company's revenue requirement among schedules. The forecast is also used to determine the set of tariff rates that will allow the Company the opportunity to collect its authorized revenue requirement.

Q. How should the non-residential sales forecast be judged?

A. The forecasting method should be selected according to the following criteria:

1. The forecast should be chosen to minimize weather adjusted forecast error variance and minimize forecast bias in back-casting and out-of-sample prediction. Forecast error variance is the sum of the squared difference of the forecast and weather adjusted actual sales. Forecast bias is the expected value of the difference between the forecast and the weather adjusted actual values, and
2. Forecast assumptions should be consistent with economic theory and the current economic environment relevant to the forecast. Both of these measures require comparing two or more forecast models.

THE COMPANY'S FORECAST AND METHODOLOGY

Q. Please describe the Company's non-residential customer sales and load forecast.

1 A. PGE's forecasting methodology is a three step process. First, a base
2 econometric model is estimated (i.e. base forecast) to determine the
3 relationship between loads and load determinants (e.g. economic and weather
4 variables). Second, the base forecast is adjusted for customer price response
5 to the Company's requested rate increase. The price adjustment is based on
6 price elasticities estimated in auxiliary econometric models. Third, the Company
7 further adjusts the forecast for incremental energy efficiency projected by the
8 Energy Trust of Oregon (ETO). PGE develops individual forecasts for specific
9 industry groups and then allocates the forecasts to rate schedules using
10 historical shares¹.

11 *BASE FORECAST*

12 **Q. Please describe PGE's development of the non-residential base model**
13 **since UE 283.**

14 A. In 2014, PGE hired a third-party consultant to review their forecasting
15 methodology. The review led PGE to modify several of its non-residential base
16 model specifications. Specifically, PGE modified the time periods and the
17 economic variables used in estimation of the base model.

18 **Q. Does Staff have concerns with PGE's methodology for the non-**
19 **residential customer base forecast?**

20 A. Staff does not have major concerns with the Company's non-residential base
21 forecast and is not proposing base forecast changes in UE 294. However,

¹ The industry group forecasts are first allocated by voltage class and then are allocated by rate schedule. See PGE's response to Staff Data Request No. 359a, attached as Exhibit Fonner/502.

1 future iterations of the base forecast may be improved in two basic ways. First,
2 the forecasts would benefit from the use of explanatory data specific to the
3 Company's service territory (i.e. county level data). Second, an integrated
4 modeling approach that jointly considers important load determinants in a
5 single model, without outboard adjustments, would improve the base forecast
6 modeling methodology.

7 *PRICE ADJUSTMENT*

8 **Q. Please describe PGE's methodology for incorporating price effects**
9 **into the non-residential customer forecast.**

10 A. PGE's current forecasting methodology accounts for customer responses to
11 price changes outside of the base econometric model. Specifically, the
12 Company estimates another set of econometric models to estimate the
13 relationship between price and the quantity of electricity demanded by
14 customers (i.e. price elasticity of demand). The base econometric models and
15 the price elasticity econometric models use the same dependent variables and
16 include similar economic drivers. The main difference between the base
17 models and the price models is that the auxiliary models include a price
18 variable, calculated as revenue divided by KWh.

19 The purpose of the price econometric models is to estimate price coefficients
20 that are then used to calculate price elasticities (i.e the typical customer
21 response to a price change) for each forecast group. The estimated price
22 elasticities are then applied to the base model forecast to derive the price-
23 adjusted forecast.

1 **Q. Is PGE's treatment of price consistent with standard practice of the**
2 **utility industry?**

3 A. Accounting for price effects outside of the base forecast is not in line with
4 standard industry practices. In 2014, the Company hired a third-party
5 consultant to review their forecasting methodology. The results of this review
6 were included in the UE 294 workpapers. The third party consultant surveyed
7 117 utility companies in the United States and Mexico about their forecasting
8 methodologies. Forty percent of the electricity utilities surveyed did not account
9 for price response at all in their commercial load forecasts and 46 percent of
10 those companies did not account for price in their industrial load forecasts. The
11 survey then asked electric utilities how they account for price responses in their
12 forecasting models. Only 11 percent of respondents who include price in their
13 industrial forecasting models did so outside the base model (i.e. the method
14 used by PGE). Thirteen percent of respondents who include price in their
15 commercial forecasting models did so outside the base model. It is Staff's
16 position that PGE should align with industry standards, either by excluding
17 price effects from their forecasting process or by appropriately accounting for
18 price within their base econometric models.

19 **Q. Does Staff have concerns with PGE's methodology for incorporating**
20 **price effects into the forecast?**

21 A. Staff has two general concerns with the Company's method for incorporating
22 price effects in the commercial and industrial forecasts. First, the method

1 double counts price effects. Second, the price econometric models perform
2 poorly in terms of estimating price coefficients.

3 Double counting of price effects results from accounting for price effects
4 outside the base econometric model. The load actuals used in base model
5 estimation include responses to past price changes, and forecasts will thus
6 reflect a background level of price response. Furthermore, price responses
7 may be partially captured through the variables that are included in the base
8 models. For example, the high (close to one) R-squared statistics reported for
9 the Company's base models indicate that the models explain a high degree of
10 the load variation. While it is possible that price response is completely
11 contained within the unexplained variation, it is more likely that the estimated
12 coefficients of explanatory variables that are correlated with price capture a
13 portion of the price response².

14 Staff's second concern with the Company's treatment of price is the poor
15 performance of the price econometric models. These models are estimated
16 specifically to derive a price coefficient that can be used to calculate price
17 elasticity (i.e. the percent change in load associated with a given percent
18 change in price) for each forecast group. Thus, the usefulness of the auxiliary
19 econometric models depends on their ability to produce a reliable estimated
20 price coefficient. However, the Company's auxiliary price models fail to meet
21 this standard. Four of the 17 total industrial and commercial auxiliary price

² For example, there is a weak positive (0.2) correlation between average real price and non-manufacturing employment, an explanatory variable used in the base models.

1 regressions produce statistically significant³ estimated price coefficients. In
2 other words, thirteen of the estimated price coefficients are not statistically
3 different from zero. Additionally, three of the regressions produce positive
4 estimated price coefficients⁴. This inconsistency leads Staff to question the
5 validity of the Company's auxiliary price regressions.

6 **Q. What is Staff's recommendation regarding PGE's treatment of price**
7 **effects in the non-residential forecasts?**

8 A. Staff recommends that PGE remove the external price adjustment from its
9 Commercial and Industrial forecasts. This approach would increase the
10 Company's preliminary 2016 forecast by 7,859 MWh (0.11%) and 6,225 MWh
11 (0.13%), in the commercial and industrial schedules, respectively.

12 **Q. How might price be effectively incorporated into PGE's future non-**
13 **residential customer forecasts?**

14 Staff believes the Company should explore alternate techniques for capturing
15 price responses in their forecasting models. First, Staff recommends the
16 Company develop an improved price variable based on the historical marginal
17 prices faced by PGE customers⁵. In the current models, PGE approximates
18 price as revenues divided by quantity of electricity. This variable includes fixed
19 customer charges and does not accurately represent the effective price faced
20 by customers. Second, the Company should explore model specifications that

³ At the .05 level.

⁴ The Company assumes a price elasticity of zero in these cases.

⁵ This can be done with past tariffs and Company databases.

1 integrate marginal price into the base econometric models and address the
2 double counting issue raised previously.

3 *ENERGY EFFICIENCY ADJUSTMENT*

4 **Q. Please describe PGE's methodology for incorporating energy**
5 **efficiency (EE) into the non-residential customer forecast.**

6 A. From the base forecast, PGE subtracts the expected future EE forecasted by
7 the ETO. The period of the EE subtracted is cumulative from the end of the
8 data used to estimate the base model to through the 2016 test year. ETO
9 produces separate EE forecasts for industrial and commercial customers. PGE
10 then allocates ETO's forecast into industry groups to calculate the base
11 forecast EE adjustment. The EE adjustment is then subtracted from the
12 Company's price adjusted forecast to get the Company's final forecast by
13 forecast group.

14 **Q. Does Staff have concerns with PGE's methodology for incorporating**
15 **energy efficiency into the forecast?**

16 A. Yes, PGE's energy efficiency adjustment double counts as the base forecast
17 includes a background level of energy efficiency. Furthermore, PGE is unable
18 to effectively evaluate the accuracy of its EE adjustment under its current
19 method.

20 **Q. How might energy efficiency be effectively incorporated into PGE's**
21 **future non-residential customer forecasts?**

22 A. Staff recommends that the Company explore alternative methods for
23 incorporating EE into the forecast. The suggested methods require, as an

1 input, historical EE data at the forecast group (i.e. industry type) level. The
2 ETO maintains a database of achieved EE at the project level, identified by
3 business type, completion date, and other project characteristics. This data can
4 be acquired by PGE and aggregated by month and forecast group⁶ to construct
5 monthly historical EE by forecast group.

6 With historical EE by forecast group, at least three alternate methods for EE
7 adjustment are possible. First, the forecast-level EE actuals can be inserted
8 into the base econometric model directly. This specification would include a
9 coefficient representing the proportion of forecasted EE that is actually
10 implemented. A second possible method is to add cumulative historical EE to
11 historical loads (i.e. base model dependent variable) before the econometric
12 model is estimated. Using the constructed dependent variable, the econometric
13 model produces a forecast of loads in the absence of ETO energy efficiency.
14 Cumulative past actual and projected EE is then subtracted from the
15 econometric forecast to produce the EE adjusted forecast.

16 Finally, the historical EE series can be used to measure error and bias in past
17 EE forecasts. This will help the Company verify the accuracy of allocated ETO
18 forecasts and to compare the allocated ETO forecast with alternative EE
19 forecasting methods.

20 **Q. What is Staff's recommendation regarding PGE's treatment of EE**
21 **effects?**

⁶ Includes both Senate Bills (SBs) 838 and 1149 EE. Thus the forecast data would differ from PGE's current method that only considers SB 838 EE.

- 1 A. Staff supports PGE's current method of EE adjustment in the current rate case,
- 2 contingent on the Company's willingness to work with Staff in developing
- 3 improved EE adjust methods, including those mentioned above.

1 **Issue 2, CUSTOMER MARGINAL COST**

2 **Q. Please summarize Staff's analysis of PGE's customer marginal cost**
3 **study.**

4 A. Staff analyzed PGE's marginal cost studies including Macfarlane-Werner
5 Workpaper "2016 TY - Customer Marginal Cost - Work papers.xlsx". The cost
6 allocations assume 2014 levels of paper and paperless billing⁷. Staff
7 recommends that the Company calculate marginal customer costs based on
8 the expected relative levels of paper and paperless billing in 2016. Staff
9 estimated the projected ratio of paper to paperless billing by calculating the
10 average annual ratio change from 2005 to 2014 and then assuming that the
11 ratio grows at that pace through 2016. Exhibit 503 shows Staff's projected
12 2016 paperless to total bills ratios by rate schedule and Exhibit 504 shows the
13 resulting customer marginal cost by rate schedule. The adjustment causes a
14 minor shift of marginal customer cost allocations among rate schedules.

15 **Q. Were any cost categories added to the study since UE 283?**

16 A. Yes in the Company's response to Staff Data Request 354, PGE states that it
17 included new cost categories in the Marginal Customer Cost study⁸. PGE has
18 communicated to Staff that these cost categories were erroneously omitted
19 from previous rate-case marginal cost studies. Staff accepts the inclusion of
20 these new cost categories in UE 294, but continues to evaluate the newly
21 included cost categories.

⁷ PGE's marginal cost study allocates to rate schedules based on 2014 actuals but the costs reflect the 2016. The mailing costs assumed in the 2016 budget are analyzed later in this testimony.

⁸ See Exhibit Staff/502. The Marginal Customer Cost study was provided in UE 294/PGE/1300 Macfarlane-Werner Workpaper "2016 TY - Customer Marginal Cost - Work papers.xlsx".

Issue 3, MAILING BUDGET**Q. Please summarize Staff's analysis of PGE's mailing expense forecast.**

A. Staff reviewed PGE's mailing counts for years 2009-2014. This data was then used to project the number of 2015 and 2016 mailings under the assumption that the future mailings change at the 2009-2014 average rate. PGE's 2009-2014 actual mailing counts and Staff's projections for 2015 and 2016 are in table 501.

Table 501

Year	Paper bills, notices and letters*	Percent change**	Other mailings	Percent change
2009	11,086,753		1,681,142	
2010	11,022,067	-0.58%	1,522,873	-9.41%
2011	10,872,156	-1.36%	1,681,588	10.42%
2012	10,638,644	-2.15%	1,100,819	-34.54%
2013	10,372,409	-2.50%	1,161,704	5.53%
2014	10,376,763	0.04%	1,263,368	8.75%
2015	10,240,788	-1.31%	1,214,736	-3.85%
2016	10,106,595	-1.31%	1,167,976	-3.85%

* From PGE's response to SDR 466

** 2015 and 2016 calculated as the average of 2009-2014

9

10

11

1 Staff projects the Company will send 270,168 fewer bills, notices and letters
2 and 95,392 fewer other mailings in 2016 compared to 2014. The Company's
3 2014 weighted average cost to send bills, notices, and letters is \$0.46⁹.

4 Assuming mailing expenses remain at 2014 levels, Staff's projected decrease
5 in mailings would reduce PGE's mailing costs by \$169,847¹⁰. However, PGE
6 reported that postage costs increased in June 2015¹¹.

7 The Company's mailing expenses are largely captured in cost categories
8 RC727 (Printing and Automated Mail Services) and RC729 (Business Services
9 Group). The Company's 2016 budget assumes that RC727 and RC729 change
10 by (\$428,843) and \$83,529, respectively, compared to 2014 actuals¹².

11 Combined, this represents a projected 7% decline in these cost categories
12 from 2014 to 2016.

13 **Q. Has Staff completed its analysis of PGE's mailing expenses?**

14 A. No. Staff's analysis of mailing expenses is ongoing.

15 **Q. Will Staff have an adjustment for postage for its next round of**
16 **testimony?**

17 A. Perhaps as we continue to investigate this issue, the result may be a proposed
18 adjustment for reduction in postage due to electronic billing.

19 **Q. Does this conclude your testimony?**

20 A. Yes.

⁹ See PGE's response to Staff Data Request No. 463, attached as Exhibit Fonner/502.

¹⁰ This also assumes that other billings cost the same as bills, notices and letters.

¹¹ See PGE's response to Staff Data Request No. 466, attached as Exhibit Fonner/502.

¹² See UE 294/PGE/1300 Macfarlane-Werner Workpaper "2016 TY - Customer Marginal Cost - Work papers.xlsx".

CASE: UE 294
WITNESS: ROBERT FONNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 501

Witness Qualification Statement

June 15, 2015

WITNESS QUALIFICATION STATEMENT

NAME: ROBERT FONNER

EMPLOYER: PUBLIC UTILITY COMMISSION OF OREGON

TITLE: SENIOR ECONOMIST
ENERGY RATES, FINANCE & AUDIT DIVISION

ADDRESS: 3930 FAIRVIEW INDUSTRIAL DR SE
SALEM OREGON 97302

EDUCATION: Bachelor of Arts, Environmental Studies and Economics,
University of Colorado, 2004

Master of Science, Natural Resource Economics,
Oregon State University, 2008

Doctor of Philosophy, Economics,
University of New Mexico, 2014

EXPERIENCE: I have been employed by the Public Utility Commission since June 2014, with my current position being a Senior Economist, in the Utility Program's Energy - Rates, Finance and Audit Division. My current responsibilities include analysis and technical support for rate, finance, and audit related proceedings, with an emphasis on forecasting and marginal cost studies.

Prior to working for the OPUC I served as an Instructor and Research Assistant in the Economics Department at the University of New Mexico. I have taught courses in Microeconomics, Macroeconomics, and the Economics of Regulation. I served as a Teaching Assistant for courses in forecasting and graduate-level econometrics.

Before my time at the University of New Mexico, I worked as an Economist for Cardno ENTRIX environmental consultants from 2007 to 2009.

I served as a Research Assistant for the Coastal Oregon Marine Experiment Station from 2004 to 2006.

CASE: UE 294
WITNESS: ROBERT FONNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 502

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

April 17, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 354
Dated April 3, 2015**

Request:

Were additional cost categories included in the customer marginal cost study compared to the customer cost study in the Company's previous rate case (UE 283)? If so, for each new cost category included, please describe in detail the Company's rationale for including the cost and explain why the cost category was not included in the marginal customer cost study in the previous rate case.

Response:

Yes. Attachment 354-A provides the requested information.

UE 294

Attachment 354-A

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Rationale for CMC Categories

Account	RC	Description	In 2015 Budget	In 2015 Study	In 2016 Study	Explanation for Inclusion in 2016 Study	Explanation for Exclusion in 2015 Study
9020001	753	Enterprise Telecommunications	Yes	No	Yes	These costs are a result of increasing lease costs associated with upgrades to the Advanced Metering Infrastructure (AMI) network required for PGE to serve a growing customer base.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9020001	999	Corporate Transfers	Yes	No	Yes	These costs represent account entries such as labor loadings, service provider allocations, accruals, amortization of prepaid costs, etc. that are necessary for accurate accounting. These costs are included in the study because they are directly tied to the costs necessary to perform the tasks contained in the functional categories in each customer service account.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	304	VP Customer Svc Operations	Yes	No	Yes	These costs represent the salary of the VP of customer service, whose role is to support the operations of customer service operations.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	361	Corporate Training	Yes	No	Yes	These costs are a result of trainings given to PGE employees in the customer service area. They are designed to help PGE employees administer quality and effective customer service.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	435	Special Attention Operations	Yes	No	Yes	These costs are a result of the work required for PGE to resolve customer disputes at the OPUC, facilitate Federal/State mandated low-income programs, and administer PGE's Medical Certificate program. These customer service functions are mandated by law.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	472	CSO Performance Management	No	No	Yes	These costs are a result of developing and tracking performance metrics, forecasting and scheduling services, and performing quality assurance for customer service.	These costs were not planned for in the 2015 budget.
9030001	555	VP Cust Strategy & Bus Devel	Yes	No	Yes	These costs represent the salary of the VP of customer strategy prorated to account for tasks performed in support of customer service operations.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	591	SVP Cust Service/Trans/Distrib	Yes	No	Yes	These costs represent the salary of the SVP of customer service prorated to account for tasks performed in support of customer service operations.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	737	IT Governance	Yes	No	Yes	These costs are a result of licensing and maintenance support of software and hardware for IT through negotiation and settlement of vendor contracts, which are necessary to perform the tasks required for customer service.	These costs should have been included in the 2015 study as they are necessary for customer service operations.

9030001	753	Enterprise Telecommunications	Yes	No	Yes	These costs are a result of the engineering required to maintain PGE's telecommunication network, which is necessary to perform the tasks required for customer service	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	754	Network Services	Yes	No	Yes	These costs are a result of maintenance required to provide stability and reliability of PGE's network and security IT infrastructure services. These services are necessary to perform the tasks required for customer service.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	757	IT Applications	Yes	No	Yes	These costs are a result of the development and support of IT applications for customer service.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	915	Corporate Communications	Yes	No	Yes	These costs are a result of supporting and managing data inquiries related to customer data, conducting load research studies, and managing customer program evaluations. These are all tasks necessary for customer service operations	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9030001	999	Corporate Transfers	Yes	No	Yes	These costs represent account entries such as labor loadings, service provider allocations, accruals, amortization of prepaid costs, etc. that are necessary for accurate accounting. These costs are included in the study because they are directly tied to the costs necessary to perform the tasks contained in the functional categories in each customer service account.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9050001	999	Corporate Transfers	Yes	No	Yes	These costs represent account entries such as labor loadings, service provider allocations, accruals, amortization of prepaid costs, etc. that are necessary for accurate accounting. These costs are included in the study because they are directly tied to the costs necessary to perform the tasks contained in the functional categories in each customer service account.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9080001	534	Customer Training & Education	Yes	No	Yes	These costs are a result of providing free educational seminars, webinars, and online trainings on energy-efficiency behaviors and technologies for business customers.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9080001	555	VP Cust Strategy & Bus Devel	Yes	No	Yes	These costs represent the salary of the VP of customer strategy prorated to account for tasks performed in support of customer service operations.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9080001	753	Enterprise Telecommunications	Yes	No	Yes	These costs are a result of increasing lease costs for other applicable networks and systems required for PGE operations.	These costs should have been included in the 2015 study as they are necessary for customer service operations.

9080001	825	Bus Continuity & Emergency Mgmt (Yes	No	Yes	These costs are a result of managing corporate security, records and information, and BCEM operations necessary for customer service operations.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9080001	915	Corporate Communications	Yes	No	Yes	These costs are the result of managing PGE's mandatory external communications e.g. safety messages, public service announcements, etc.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9080001	927	Customer Insights	Yes	No	Yes	These costs are a result of supporting and managing data inquiries related to customer data, conducting load research studies, and managing customer program evaluations. These are all tasks necessary for customer service operations.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9080001	937	Customer Mass Programs	Yes	No	Yes	These costs are the result of managing and promoting mass market programs for customers e.g., paperless billing, payment programs, energy-efficiency programs, etc.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9080001	999	Corporate Transfers	Yes	No	Yes	These costs represent account entries such as labor loadings, service provider allocations, accruals, amortization of prepaid costs, etc. that are necessary for accurate accounting. These costs are included in the study because they are directly tied to the costs necessary to perform the tasks contained in the functional categories in each customer service account.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9090001	915	Corporate Communications	Yes	No	Yes	These costs are the result of managing PGE's mandatory external communications e.g. safety messages, public service announcements, etc.	These costs should have been included in the 2015 study as they are necessary for customer service operations.
9090001	999	Corporate Transfers	Yes	No	Yes	These costs represent account entries such as labor loadings, service provider allocations, accruals, amortization of prepaid costs, etc. that are necessary for accurate accounting. These costs are included in the study because they are directly tied to the costs necessary to perform the tasks contained in the functional categories in each customer service account.	These costs should have been included in the 2015 study as they are necessary for customer service operations.

April 15, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 359
Dated April 6, 2015**

Request:

For each PGE load forecast group, including the residential forecast groups (i.e. Single-family space heat, Single-family non-space heat, Multi-family space heat, Multi-family non-space heat, Manufactured home space heat, Manufactured home non-space heat, Other residential), the commercial forecast groups (i.e. Food stores, Govt. & education, Health services, Lodging, Misc. Commercial, Merchandise Stores, Office & F.I.R.E., Other Services, Other Trade, Restaurants, Transportation & Communication & Utility) and the Manufacturing groups (i.e. Food Processing, High Tech, Lumber, Metal, Other Manufacturing, Paper, Transportation Equipment):

- a. Please provide the corresponding rate schedule that the forecast group is assigned to in the Company's revenue model.
- b. Please provide in excel format, with all cell formulae intact, the monthly historical rates charged for each rate schedule referred to in DR 359 part a. from January 1990 to December 2014 in 2005 dollars.
- c. Please provide in excel format, with all cell formulae intact, the Company's monthly base load forecast for 2016 (in KWh) after the price elasticity and energy efficiency adjustments have been applied.
- d. Please provide in excel format, with all cell formulae intact, the Company's monthly base load forecast for 2016 (in KWh), before the energy efficiency adjustment or price elasticity adjustment are applied.
- e. Please provide in excel format, with all cell formulae intact, the Company's monthly base load forecast for 2016 (in KWh), the price elasticity adjustment is applied, but after the energy efficiency adjustment is applied.¹

¹ Per e-mail communication with OPUC Staff the part (e) of the response is revised to the following:

- f. Please provide in excel format, with all cell formulae intact, the Company's monthly price elasticity and energy efficiency adjustment adjustments for 2016 (in KWh).**

Response:

PGE objects to this request to the extent it is vague, overly broad and unduly burdensome. Subject to and without waiving its objection, PGE responds as follows:

- a) PGE does not directly assign each non-residential forecast group to a rate schedule. Rather, PGE uses a two-step allocation process: first, the forecast group energy is allocated to voltage delivery class using historic voltage delivery shares. These factors are provided in Attachment 359-A. Tab 1 provides the first step allocation factors which are applied to forecast group energy. Tab 2 provides the second set of factors which are applied to voltage delivery class energy to allocate energy to rate schedules. Tab 3 provides the allocations flow chart.

Note that there are several important details within this process. For the non-residential forecast group energy, the allocation factors are applied only to forecast group energy – the large customers that PGE forecasts individually and all miscellaneous schedules are excluded. An adjustment is also made for the MWh associated with three large customers who are on sub transmission delivery voltage service, but who are not individually forecasted. These adjustments are made to the ECTU² and ECOT³ forecast groups and the monthly MWh amounts are shown as notes to the factors in Tab 1.

Direct assignment to rate schedules is used for the residential forecast groups, which are allocated entirely to residential voltage delivery service, which in turn is allocated entirely to Rate Schedule 7. Similarly, miscellaneous schedules (15R, 15C, 47, 49, 91, 92 and 95) are mapped directly to their delivery voltage class and to rate schedule (with irrigation energy split to rate schedules 47 and 49).

- b) PGE does not keep records of prices for each rate schedule in the manner requested. Literal compliance with this request would require PGE to research every Advice Filing since 1990 and catalog all applicable prices for all rate schedules existing at that time.

Attachment 359-B contains the prices and price changes with effective dates of the price changes for Rate Schedules 7, 32, 83, 85, 89, and 90 and their predecessor schedules from October 2000 to January 1, 2015 inclusive of applicable supplemental schedules. These rate schedules comprise approximately 99% of the UE 294 projected energy

Please provide in excel format, with all cell formulae intact, the Company's monthly base load forecast for 2016 (in KWh), before the price elasticity adjustment is applied, but after the energy efficiency adjustment is applied.

² ECTU represents Trans, Comm, Util commercial group and includes the following NAICS: 221, 481-493, 513, 562

³ ECOT represents Other Trade commercial group and includes the following NAICS: 421-444, 446-451, 453-454

consumption for Cost-of-Service customers. The spreadsheet in Attachment 359-B calculates nominal bills for approximate typical usages for each rate schedule corresponding to each schedule's current average profile. These nominal bills include applicable customer charges, demand charges, facilities charges, and volumetric charges.

Because the various prices for each schedule are included in Attachment 359-B, this should allow Staff to isolate certain components for each rate schedule such as volumetric charges with or without supplemental schedules, customer charges, or demand-related charges. Staff may also use the particular inflation adjustment they deem most appropriate to restate the nominal typical bills or components of the nominal typical bills in 2005 dollars.

- c) Please find the requested information in Attachment 359-C, tab labeled "DR359_part_c".
- d) Please find the requested information in Attachment 359-C, tab labeled "DR359_part_d". As described in PGE response to OPUC Data Request No. 277, an adjustment for a customer co-gen project is shown in this table for the ECTU forecast group.
- e) PGE did not perform the requested forecast and does not have the information to respond to this request.
- f) Please find the requested information in Attachment 359-C, in two tabs: the tab labeled "DR359_part_f_price" contains the price elasticity adjustment and the tab "DR359_part_f_ee" contains the energy efficiency adjustment.

UE 294

Attachment 359-A

Allocation Factors

Provided in Electronic Format only

UE 294

Attachment 359-B

The Prices and Price Changes

Provided in Electronic Format only

UE 294

Attachment 359-C

2016 Base Load Forecasts and Price Elasticity

Provided in Electronic Format only

June 1, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 463
Dated May 18, 2015**

Request:

For customers receiving bills by mail:

- a. Describe in detail, and provide dollar value breakdown of the components of the 2014 actual and 2016 budgeted fixed costs associated with sending monthly bills to customers by mail.**
- b. Describe in detail, and provide dollar value breakdown of the components of the 2014 actual and 2016 budgeted marginal costs associated with sending one additional monthly bill to a customer by mail.**

Response:

- a. The "2014 Billing Statements" tab of Attachment 463-A provides a breakdown of the components of 2014 actual fixed costs associated with sending monthly bills to customers by mail. Total 2014 costs appear under the "Cost Breakdown" header on page 4. Note that the incremental costs in category III in the Cost Breakdown table are separately itemized and are not included in the totals for Categories I or II. Category II is the sum of Category I incremental costs, plus the fixed costs of production.

PGE does not create a bottom-up projection of costs for the 2016 budget. For budgeting purposes, we use end of year expenses for 2014, and escalate for factors relevant to the specific budget categories. The RC 727 and 729 budgets are developed in this manner. These budgets have been reduced based on a forecast of the adoption of paperless billing.

- b. Categories I and III in the "2014 Billing Statements" tab of Attachment 463-A provide a breakdown of the components of 2014 incremental costs associated with sending monthly bills to customers by mail. Total 2014 costs appear under the "Cost Breakdown" header. PGE does not create a bottom-up projection of these costs for the 2016 budget.

UE 294

Attachment 463-A

Provided in Electronic Format only

Itemized Costs for PGE Billing Statements, Notice Statements, and
Credit Letters

PGE Billing Statements

	2014 Volume	\$\$ / 000	\$\$ / Piece	Current Yearly Cost
Number of Customer Bills	8,629,476			
Postage			\$0.3756	\$3,241,459
Presort			\$0.0015	\$13,247
Number of Sheets (2 up Forms)	4,314,738	\$37.79	\$0.0189	\$163,054
Number of Feet for duplex printing InfoPrint Click Charge	7,910,353	0.0029	\$0.0026	\$22,545
InfoPrint Maintenance Bill Production (73.91% of volume)			\$0.0051	\$43,732
Pitney Bowes APS Maintenance (84.31% of volume)			\$0.0092	\$79,010
Pitney Bowes File Based Audit Maintenance (84.31% of volume)			\$0.0004	\$3,765
Trimwinder Maintenance (84.31% of 1st winder)			\$0.0003	\$2,445
Envelopes (Outer)	8,629,476	\$17.64	\$0.0176	\$152,224
Envelopes (Return)	7,391,032	\$15.77	\$0.0135	\$116,557
Digital Meter Rental			\$0.0000	\$337
Digital Meter Ink			\$0.0003	\$2,589
Digital Meter Printing Heads			\$0.0001	\$725
InfoPrint Ink Cost (B&W Only, Duplex @4% coverage)			\$0.0018	\$15,706
Labor Cost ** (0% Loading)			\$0.0101	\$86,731
Total Cost of Production			<u>\$0.4571</u>	<u>\$3,944,124</u>

Percentage of InfoPrint usage for Bills	73.91%
APS, One (1) Trimwinder and FBA Percentage	84.31%

PGE Notice Statements

	2014 Volume	\$\$ / 000	\$\$ / Piece	Current Yearly Cost
Number of Notices	1,605,887			
Postage			\$0.3779	\$606,888
Presort			\$0.0008	\$1,209
Number of Sheets (2 up Forms)	802,944	\$37.79	\$0.0189	\$30,343
Number of Feet for Duplex Printing InfoPrint Click Charge	1,472,063	0.0029	\$0.0026	\$4,195
InfoPrint Maintenance Notice Production (13.76% of volume)			\$0.0051	\$8,138
Pitney Bowes APS Maintenance (15.69% of volume)			\$0.0492	\$79,010
Pitney Bowes File Based Audit (15.69% of volume)			\$0.0004	\$701
Trimwinder Maintenance (15.69% of 1st winder)			\$0.0003	\$455
Envelopes (Outer)	1,605,887	\$17.64	\$0.0176	\$28,328
Envelopes (Return)	1,041,434	\$15.77	\$0.0102	\$16,423
Digital Meter Rental			\$0.0000	\$63
Digital Meter Ink			\$0.0003	\$482
Digital Meter Printing Heads			\$0.0001	\$135
InfoPrint Ink Cost (B&W Only, Duplex @4% coverage)			\$0.0018	\$2,923
Labor Cost ** (0% Loading)			\$0.0105	\$16,855
Total Cost of Production			<u>\$0.4958</u>	<u>\$796,149</u>

Percentage of InfoPrint usage for Notices	13.76%
APS, One (1) Trimwinder and FBA Percentage	15.69%

PGE Credit Letters

	2014 Volume	\$\$ / 000	\$\$ / Piece	Current Yearly Cost
Number of Credit Letters	141,400			
Postage			\$0.3970	\$56,141
Presort			\$0.0186	\$2,626
Number of Sheets (2 up Forms)	70,700	\$37.74	\$0.0189	\$2,668
Number of Feet for Duplex printing IBM Click Charge	129,617	0.0029	\$0.0026	\$369
InfoPrint Maintenance Letters Production (1.26% of Volume)			\$0.0051	\$717
InfoPrint Ink Cost (B&W Only, Simplex @4% coverage)			\$0.0009	\$129
FPS Maintenance (11.12% of volume)			\$0.0366	\$5,171
Trimwinder Maintenance (11.12% of volume)			\$0.0002	\$28
Envelopes (Outer)	141,400	\$32.58	\$0.0326	\$4,607
Digital Meter Rental			\$0.0003	\$39
Digital Meter Ink			\$0.0003	\$42
Digital Meter Printing Heads			\$0.0001	\$12
Labor Cost ** (0% Loading)			\$0.0596	\$8,434
Total Cost of Production			<u>\$0.5727</u>	<u>\$80,984</u>

Percentage of InfoPrint usage for Letters	1.21%
FPS, One (1) Trimwinder and FBA Percentage	9.82%

Other PGE Mailings

		\$\$ / 000	\$\$ / Piece	Current Yearly Cost
Number of Pieces	1,298,158			

Cost Breakdown

I. RC 727 (PAMS) Incremental Costs (Postage, Clicks, Consumables)

	Annual Volume	Annual Costs	Cost/Piece
Bills	8,629,476	\$3,296,270	\$0.3820
Notices	1,605,887	\$615,832	\$0.3835
Letter	<u>141,400</u>	<u>\$59,319</u>	<u>\$0.4195</u>
Total	<u>10,376,763</u>	<u>\$3,971,421</u>	<u>\$0.3827</u>

II. RC 727 (PAMS) Total Cost to Produce (All Inclusive)

	Annual Volume	Annual Costs	Cost/Piece
Bills	8,629,476	\$3,512,289	\$0.4070
Notices	1,605,887	\$721,054	\$0.4490
Letter	<u>141,400</u>	<u>\$73,709</u>	<u>\$0.5213</u>
Total	<u>10,376,763</u>	<u>\$4,307,052</u>	<u>\$0.4151</u>

III. RC 729 (Corporate Services Group) Incremental Costs (Forms and Envelopes)

	Annual Volume	Annual Costs	Cost/Piece
Bills	8,629,476	\$431,834	\$0.0500
Notices	1,605,887	\$75,094	\$0.0468
Letter	<u>141,400</u>	<u>\$7,275</u>	<u>\$0.0515</u>
Total	<u>10,376,763</u>	<u>\$514,204</u>	<u>\$0.0496</u>

June 5, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE Response to OPUC Data Request No. 466
Dated May 22, 2015**

Request:

With regard to PGE's printing and billing costs embedded in the UE 294/PGE/1300 Macfarlane-Werner Workpaper "2016 TY - Customer Marginal Cost - Work papers.xlsx":

- a. Please provide the postage rates by month for PGE to send bills, notices, credit letters, and all other mail to customers in 2012, 2013, 2014, 2015; and the forecasted rates for 2016;
- b. Please identify and explain the incentives provided by PGE to encourage paperless billing and electronic delivery of other mailings;
- c. Please provide the monthly number of pieces of mail sent by PGE to customers each year for years 2005 to 2014; and
- d. Please provide the number of pieces of mail by month that PGE projects it will send to customers in 2016 and identify the forecasted postage rate expected for each mailing.

Response:

- a. See Attachment 466-A for postage rates by month covering the years 2012 through 2015. PGE does not project the number of pieces of mail for 2016, or the specific postage rate, to determine the 2016 budget. The 2016 budget for Printing and Automated Mail Services (Department 727) is based on PGE's current 2015 postage rate expense escalated for 2016. Then, in order to account for the estimated savings related to paperless billing PGE, reduced this amount by approximately \$281,000, an increase of 15% over the 2015 budgeted reduction. PGE's total forecasted postage expense, including the estimated

- savings from paperless billing, represents a decrease of approximately \$744,000 (17%) from 2014 actuals.
- b. PGE has not provided any monetary incentives to customers to encourage the Paperless Billing (Paperless) program. Some of the non-monetary incentives PGE has provided include:
- For an October 2014 sweepstakes promoting the Paperless program, PGE randomly awarded three separate prizes to customers enrolled in the program by the end of the sweepstakes.
 - In March 2014, PGE partnered with Friends of Trees (FOT) on an enrollment promotion that donated \$1 to FOT for every new customer that enrolled in the Paperless program during the promotional period. PGE communicated this promotion through several channels, including targeted emails, PGE Update, Home Connection, Facebook, Twitter, FOT (blog posts, newsletters, web), radio, and a web banner on Portlandgeneral.com. PGE also held similar FOT promotions in February of 2012 and March of 2013.
- c. See Attachment 466-B.
- d. See PGE's response to part (a), above.

UE 294

Attachment 466-A

Provided in Electronic Format only

Postage Rates for 2012-2015

PAPER CUSTOMER BILLING STATEMENTS

CUSTOMER NOTICES & CREDIT LETTERS

Level of Sortation	5-Digit IMB	3-Digit IMB	AADC IMB	Mixed ADC IMB	5-Digit Auto	Full Rate	5-Digit Auto	3-Digit Auto	AADC Auto	Mixed ADC Auto	Full Rate
2012 January*	0.337	0.362	0.365	0.387	0.340	0.465	0.340	0.365	0.368	0.390	
February	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	
March	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	
April	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	
May	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	
June	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	
July	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	
August	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	0.450
September	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	0.450
October	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	0.450
November	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	0.450
December	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	0.450
2013 January*	0.347	0.371	0.371	0.401	0.350		0.350	0.374	0.374	0.404	
February	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
March	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
April	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
May	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
June	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
July	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
August	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
September	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
October	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
November	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
December	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
2014 January*	0.357	0.381	0.381	0.402	0.360		0.360	0.384	0.384	0.405	
February	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
March	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
April	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
May	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
June	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
July	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
August	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
September	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
October	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
November	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
December	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
2015 January	0.378	0.403	0.403	0.432	0.381	0.485	0.381	0.406	0.406	0.435	
February	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
March	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
April	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
May	0.378	0.403	0.403	0.432	0.381		0.381	0.406	0.406	0.435	
June	0.388	0.413	0.413	0.436	0.391		0.391	0.416	0.416	0.439	
July	0.388	0.413	0.413	0.436	0.391		0.391	0.416	0.416	0.439	
August	0.388	0.413	0.413	0.436	0.391		0.391	0.416	0.416	0.439	
September	0.388	0.413	0.413	0.436	0.391		0.391	0.416	0.416	0.439	
October	0.388	0.413	0.413	0.436	0.391		0.391	0.416	0.416	0.439	
November	0.388	0.413	0.413	0.436	0.391		0.391	0.416	0.416	0.439	
December	0.388	0.413	0.413	0.436	0.391		0.391	0.416	0.416	0.439	

2016 Postage rates are not available. The postage budget for 2015 is escalated and used to estimate 2016 budget expense.

*Note: Postage rate increase occurs in month of January.

Postage rate depends on level of sortation. PGE processes addresses through postal sortation software, which allows PGE to receive postage discounts with the USPS.

UE 294

Attachment 466-B

Provided in Electronic Format only

Monthly Pieces of Mail for 2005 through 2014

	January	February	March	April	May	June	July	August	September	October	November	December	Total Year
2005													
Paper Bills, Notices, and Letters	877,554	897,872	880,892	875,144	866,563	860,777	857,767	865,032	864,513	859,469	867,775	902,525	10,475,883
Postage	\$244,925.85	\$250,924.68	\$246,411.53	\$244,903.98	\$242,620.78	\$241,015.89	\$240,169.18	\$240,912.32	\$241,916.05	\$240,764.35	\$254,284.90	\$245,986.81	\$2,934,836.32
Other Mailings*	41,302	144,171	156,753	279,416	140,213	190,437	54,374	66,140	105,745	193,442	177,046	102,622	1,651,661
Postage	\$6,814.83	\$23,788.22	\$25,864.42	\$46,103.64	\$23,135.15	\$31,422.10	\$8,971.71	\$10,913.10	\$17,447.93	\$31,917.93	\$29,212.59	\$16,923.63	\$272,515.24
2006													
Paper Bills, Notices, and Letters	926,265	946,629	924,452	934,051	910,827	896,074	889,153	901,545	892,290	887,267	872,976	906,130	10,887,659
Postage	\$311,167.67	\$279,925.35	\$271,449.52	\$275,156.61	\$268,720.25	\$264,234.78	\$261,193.58	\$266,026.17	\$263,290.49	\$261,741.82	\$257,595.92	\$267,053.33	\$3,247,555.48
Other Mailings*	76,198	126,203	96,952	102,993	249,615	126,292	28,997	115,339	63,604	267,750	128,349	84,587	1,466,879
Postage	\$12,572.67	\$20,823.49	\$15,997.08	\$16,993.84	\$40,936.86	\$20,838.18	\$4,784.50	\$19,030.94	\$10,494.66	\$44,178.75	\$21,177.85	\$13,956.86	\$241,785.68
2007													
Paper Bills, Notices, and Letters	924,315	949,978	928,143	876,312	901,497	891,534	897,349	910,694	900,460	895,105	883,301	912,677	10,871,365
Postage	\$271,989.93	\$276,636.64	\$273,551.23	\$257,936.21	\$277,817.97	\$279,910.86	\$281,152.45	\$286,069.55	\$282,585.61	\$280,993.38	\$277,960.59	\$285,763.36	\$3,332,367.76
Other Mailings*	68,137	63,919	208,769	137,545	83,616	131,428	84,053	88,842	253,051	145,130	80,494	120,117	1,465,101
Postage	\$11,242.61	\$10,610.55	\$34,446.89	\$22,694.93	\$13,796.64	\$21,685.52	\$13,868.74	\$14,658.93	\$41,753.41	\$23,946.45	\$19,281.51	\$19,819.31	\$241,805.47
2008													
Paper Bills, Notices, and Letters	924,275	960,886	949,038	926,323	925,217	905,372	898,250	906,107	895,306	894,753	869,278	892,098	10,946,903
Postage	\$288,658.63	\$301,403.42	\$298,594.60	\$289,245.36	\$298,411.96	\$294,551.63	\$291,518.29	\$294,980.34	\$292,259.62	\$291,042.14	\$284,579.73	\$281,230.47	\$3,506,476.19
Other Mailings*	32,995	70,102	244,126	103,354	162,364	140,240	28,611	72,708	219,565	221,424	63,789	174,745	1,534,023
Postage	\$6,203.06	\$13,038.97	\$45,707.44	\$19,399.55	\$30,524.43	\$26,365.12	\$5,693.59	\$13,669.10	\$41,278.82	\$41,627.71	\$12,056.12	\$32,852.06	\$288,415.97
2009													
Paper Bills, Notices, and Letters	911,320	962,411	957,487	940,576	933,348	914,986	905,843	919,809	918,326	909,636	892,070	920,941	11,086,753
Postage	\$302,785.69	\$314,142.67	\$311,442.79	\$305,196.01	\$311,818.83	\$307,743.55	\$304,260.94	\$308,646.64	\$308,642.43	\$304,832.71	\$298,876.95	\$310,641.96	\$3,689,031.16
Other Mailings*	34,960	89,833	80,237	113,561	247,146	102,698	81,252	98,207	213,805	306,451	155,366	157,626	1,681,142
Postage	\$7,533.88	\$19,359.01	\$17,010.24	\$24,097.64	\$51,653.51	\$21,463.88	\$17,022.57	\$19,543.19	\$42,333.39	\$58,838.59	\$30,762.47	\$31,052.32	\$340,670.70
2010													
Paper Bills, Notices, and Letters	946,227	962,399	926,532	925,711	920,765	911,880	913,824	916,665	904,052	904,333	881,280	908,399	11,022,067
Postage	\$319,988.28	\$323,561.34	\$311,567.18	\$311,138.59	\$309,387.79	\$306,284.55	\$306,768.97	\$307,149.29	\$303,309.28	\$304,125.78	\$296,579.62	\$305,011.03	\$3,704,871.70
Other Mailings*	111,143	100,932	190,276	137,867	186,424	146,031	75,653	116,397	196,112	130,097	57,731	74,210	1,522,873
Postage	\$23,984.66	\$21,750.85	\$40,947.40	\$29,710.34	\$40,174.37	\$31,513.49	\$16,310.79	\$25,141.75	\$42,183.69	\$27,944.84	\$12,423.71	\$15,969.92	\$328,055.79
2011													
Paper Bills, Notices, and Letters	924,990	956,261	917,807	931,087	913,932	908,480	893,511	895,477	882,209	888,046	864,613	895,743	10,872,156
Postage	\$319,476.23	\$321,498.20	\$307,369.50	\$314,869.64	\$311,645.12	\$309,685.81	\$304,490.69	\$305,154.75	\$300,824.97	\$302,872.00	\$293,426.02	\$303,491.81	\$3,694,804.72
Other Mailings*	213,451	211,007	134,983	80,616	178,431	95,165	79,454	110,685	168,264	164,831	142,962	101,739	1,681,588
Postage	\$46,169.45	\$45,767.42	\$29,142.83	\$17,453.36	\$38,505.41	\$20,574.67	\$17,225.63	\$23,919.03	\$36,277.72	\$35,570.53	\$30,894.88	\$21,985.80	\$363,486.73
2012													
Paper Bills, Notices, and Letters	923,887	929,666	900,017	906,889	892,026	876,976	874,403	870,680	870,247	865,894	851,688	876,271	10,638,644
Postage	\$318,337.31	\$323,788.67	\$313,431.03	\$316,076.60	\$310,868.66	\$305,526.33	\$304,611.73	\$303,249.84	\$302,568.84	\$301,339.08	\$296,498.07	\$304,770.05	\$3,701,066.20
Other Mailings*	65,505	112,281	174,079	69,355	77,854	38,172	78,992	124,085	70,701	139,011	31,385	119,399	1,100,819
Postage	\$14,280.09	\$24,252.70	\$38,032.26	\$15,119.39	\$16,855.39	\$8,397.84	\$17,101.77	\$26,951.26	\$15,313.84	\$30,304.40	\$6,904.70	\$25,826.00	\$239,339.64
2013													
Paper Bills, Notices, and Letters	885,167	903,066	880,829	875,005	855,210	851,890	849,292	863,881	851,727	855,037	840,186	861,119	10,372,409
Postage	\$309,824.38	\$323,067.17	\$315,162.01	\$313,219.60	\$306,033.67	\$304,830.88	\$303,533.84	\$308,688.51	\$304,349.83	\$305,737.07	\$300,357.23	\$307,416.34	\$3,702,220.51
Other Mailings*	154,557	59,275	99,584	143,757	97,611	113,439	59,843	121,605	112,890	64,909	33,753	100,481	1,161,704
Postage	\$36,939.12	\$13,514.70	\$23,765.25	\$33,920.35	\$22,645.75	\$26,998.48	\$13,285.15	\$27,117.92	\$26,303.37	\$14,344.89	\$8,168.23	\$24,617.85	\$271,621.05
2014													
Paper Bills, Notices, and Letters	878,937	885,770	885,999	879,619	856,032	858,692	851,284	873,807	859,556	857,551	834,870	854,706	10,376,763
Postage	\$319,175.95	\$334,563.46	\$334,766.54	\$332,527.00	\$323,546.67	\$324,713.13	\$322,670.78	\$329,755.69	\$324,335.68	\$323,842.29	\$315,221.94	\$319,369.50	\$3,904,488.63
Other Mailings*	116,946	30,044	43,878	152,181	155,714	125,446	210,524	74,425	77,704	105,034	49,871	121,601	1,263,368
Postage	\$27,950.09	\$6,970.21	\$10,486.84	\$36,675.62	\$36,125.65	\$29,103.47	\$49,052.09	\$17,862.36	\$18,571.26	\$24,788.02	\$11,919.17	\$29,305.84	\$298,810.63

* Other Mailings - Please note that RC727 does not plan or manage volume of mailings or budget postage associated with. Internal clients are charged back directly for all postage costs incurred.

- Types of Mailings within this category:
- Tree Letters (overhead and underground)
- Preferred Due Date/Migration/Transfer Letters
- Monthly Time of Use Letters
- Monthly Renewable Letters
- Dunning Letters
- Payroll Advice Letters for Retiree and Employees
- Misc. Letters and Mailings as the business requires.

Many of these mailings qualify for "standard" postage rates, which are lower than "first-class" rates associated with Bills, Notices and Credit Letters.

CASE: UE 294
WITNESS: ROBERT FONNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 503

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

STAFF FORECAST OF PROPORTION OF PAPERLESS BILLS IN 2016

PGE SCHEDULES	7	32	38	47	49	83	85	89	91 & 95
Residential	< 30 kW	< 200 kW	< 30 kW	> 30 kW	31-200 kW	201-4000 kW	> 4 MW	Street lighting	
Percent Paperless	20%	16%	16%	4%	3%	18%	27%	28%	3%

CASE: UE 294
WITNESS: ROBERT FONNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 504

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

STAFF ADJUSTMENT TO CUSTOMER MARGINAL COSTS

Schedule	Description	Company		Staff Revised	
		Annual Billing Expenses	Total Customer Expenses	Annual Billing Expenses	Total Customer Expenses
Schedule 7	Residential	\$48.77	\$68.81	\$48.80	\$68.84
Schedule 15	Residential - Area Lights	\$50.05	\$68.24	\$50.05	\$68.24
Schedule 15	Commercial - Area Lights	\$37.52	\$54.45	\$37.52	\$54.45
Schedule 32	Small Non-Residential (< 30 kW)	\$41.18	\$70.98	\$40.98	\$70.77
Schedule 38	Large Non-Residential Time-of-Use	\$122.25	\$321.81	\$122.05	\$321.62
Schedule 47	Small Irrigation	\$49.18	\$77.46	\$49.02	\$77.29
Schedule 49	Large Irrigation	\$49.45	\$136.49	\$49.28	\$136.32
Schedule 83	Large Non-Residential (31-200 kW)	\$64.26	\$224.02	\$64.06	\$223.83
Schedule 85	Large Non-Residential (201-1,000 kW)	\$144.31	\$886.50	\$144.10	\$886.29
Schedule 89	Large Non-Residential (> 4,000 kW)	\$125.33	\$5,397.94	\$125.17	\$5,397.78
Schedule 90	Large Non-Residential (>4,000 kW and Aggregate to >100 aMW)	\$22.10	\$17,982.84	\$22.18	\$17,982.92
Schedule 91 & 95	Street and Highway Lighting	\$815.35	\$948.15	\$814.95	\$947.76

CASE: UE 294
WITNESS: BRITTANY ANDRUS

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 600

OPENING TESTIMONY

June 15, 2015

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Brittany Andrus. I am a Senior Utility Analyst with the Public Utility
3 Commission of Oregon. My business address is 3930 Fairview Industrial Dr.
4 SE, Salem, Oregon 97302.

5 **Q. Please describe your educational background and work experience.**

6 A. My Witness Qualification Statement is found in Exhibit Staff/601.

7 **Q. What is the purpose of your testimony?**

8 A. My testimony addresses two items: 1) Staff's analysis of PGE's calculation of
9 its franchise fee obligations, and 2) Staff's position on the assignment of costs
10 for implementing the portfolio options programs.

11 **Q. What elements of the franchise fee rate did Staff examine in this case?**

12 A. Staff issued seven data requests addressing individual franchise agreements,
13 historical payments by jurisdiction, and the impacts of direct access forecasts
14 on the franchise fee calculation.

15 **Q. Please describe Staff's analysis of PGE's franchise fees.**

16 A. Staff analyzed the Company's filing, reviewed the Company's responses to
17 Staff's data requests and thereby verified the data and calculations used to
18 derive the franchise fee rate. Based on this information, Staff concludes that
19 the franchise fee rate is accurate.

20 **Q. Please describe the portfolio options programs and how they relate to this**
21 **rate case.**

22 A. Electric companies are required to offer residential and small nonresidential
23 customers a portfolio of rate options, including an option for renewable energy

1 resources and a market-based rate. For PGE, the renewable option is
2 implemented through its Green Source and Clean Wind products, and the
3 market-based rate is a time-of-use product. Participation in the time-of-use
4 product is quite limited, while participation in the renewables programs is
5 significant, surpassing 100,000 residential and small non-residential customers
6 in 2014. Certain costs related to these voluntary programs are to be included
7 in the program rates to ensure that non-participating customers are not paying
8 for them.

9 **Q. What aspects of PGE's portfolio options programs did Staff examine in**
10 **this case?**

A. Staff issued three portfolio options data requests, addressing program expenditures, costs of renewable energy certificates (RECs) acquired, and the cost allocation method employed in estimating costs for PGE program administration. Staff also issued one data request regarding the Company's acquisition of RECs for customers not eligible for portfolio options programs.

Q. Please explain which costs should be included in the rates for the voluntary programs.

11 A. OAR 860-038-0220(8)(c) requires that "the portfolio rates must include any
12 additional electric company costs that are incurred when a consumer chooses
13 to be served under the portfolio rate option." Section (8)(f) of this rule states
14 that "rates must be established so that costs associated with the development
15 or offering of rate options are assigned to the retail electricity consumers
16 eligible to choose such rate options." Thus, the costs incurred when the

1 programs are chosen by the voluntary program participants are born by those
2 participants, while the costs of developing the product or products to be offered
3 under the portfolio options are allocated to all residential and small commercial
4 customer classes.

5 **Q. How has PGE allocated these costs?**

6 A. PGE's initial response to data request number 370 indicates that \$0.40 per
7 MWh sold under the Green Source program is for the indirect program costs
8 incurred, including billing, call center, web development, contract management
9 and others. PGE's supplemental response to this data request, included as
10 Staff Exhibit 602, acknowledges that the basis for the establishment of the
11 \$0.40 per MWh is not available. In addition, this amount has not been
12 evaluated since the inception of the portfolio options programs in 2001.¹

13 **Q. What is Staff's position on this issue?**

14 A. Staff has no information that can be used to determine whether or not the costs
15 incurred when customers choose a portfolio option are paid for by the voluntary
16 customers. Staff concludes that in order to assure that the costs of
17 implementing the voluntary programs are included in the rates those customers
18 pay, PGE should conduct a review of all of the costs incurred in implementing
19 the portfolio options programs. Staff agrees with PGE's identification of the
20 costs that are appropriately included with program implementation in the
21 DR 370 supplemental response: "...call center and customer service, billing
22 and payment, accounting and budgeting, contracts management (support for

¹ Order No. 01-337 at 3.

1 RFP processes and standard contract terms), marketing (including web
2 support).” After the costs are known, PGE should calculate the appropriate
3 dollar-per-MWh rate that will compensate for those costs, and include it in the
4 voluntary program rates to ensure that the voluntary participants are paying an
5 amount that covers those costs.

6 **Q. When should this cost review be conducted?**

7 A. PGE should complete the cost analysis and make any necessary changes to its
8 cost allocations for the voluntary programs for 2016 and beyond. PGE should
9 then review this allocation to determine any necessary adjustments on a
10 periodic basis, such as every five years.

11 **Q. Does this conclude your testimony?**

12 A. Yes.

CASE: UE 294
WITNESS: BRITTANY ANDRUS

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 601

Witness Qualification Statement

June 15, 2015

WITNESS QUALIFICATION STATEMENT

NAME: Brittany Andrus

EMPLOYER: Public Utility Commission of Oregon

TITLE: Senior Utility Analyst
Energy, Resources and Planning

ADDRESS: 3930 Fairview Industrial Dr. SE
Salem, Oregon, 97302-1166

EDUCATION: M.B.A.
Portland State University, Portland, Oregon

B.A. English
Michigan State University, East Lansing, Michigan

EXPERIENCE: I have been employed at the Oregon Public Utility Commission since 2011. My current responsibilities include research, analysis and technical support for electric company proceedings, with an emphasis on resource planning, power costs, and qualifying facilities under PURPA.

I was previously employed for 17 years by the Bonneville Power Administration, a wholesale power marketing agency within the federal Department of Energy. My duties included energy efficiency planning and program management, long term load and revenue forecasting, long term power sales contracts, rate impact analysis, short term load forecasting, power and transmission scheduling, and management of load forecasting data and processes.

CASE: UE 294
WITNESS: BRITTANY ANDRUS

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 602

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

May 5, 2015

TO: Kay Barnes
Oregon Public Utility Commission

FROM: Patrick Hager
Manager, Regulatory Affairs

**PORTLAND GENERAL ELECTRIC
UE 294
PGE First Supplemental Response to OPUC Data Request No. 370
April 30, 2015**

Request:

Please provide an explanation of PGE's method for allocating costs to the voluntary renewables programs, including but not limited to program management, contracts management, billing, call center, product development, marketing (including web development), and regulatory affairs. Please include in this explanation a description of PGE's method for monitoring the accuracy of this allocation method, any changes to the allocation method during calendar years 2011 through 2014, and a description of the impetus for those changes.

Response (Dated April 27, 2015):

Fixed Renewable/Clean Wind Option

PGE's current renewable portfolio options include Fixed Renewable Option, Renewable Usage Option, and Habitat Option. Customers enrolling in the Fixed Renewable Option (also called Clean Wind) currently pay \$2.50 per month for 200 kWh of renewable energy credits (RECs) and to make a contribution to a renewable resources development and demonstration fund. Of the \$2.50 per 200 kWh block purchased, \$1.50 is deposited into the development fund and \$1.00 goes to the purchase of RECs on that customer's behalf. Table 1, below, lists the current allocation (effective January 1, 2013) plus the previous allocation.

Table 1: Clean Wind				
Effective December 1, 2008				
RECs		\$ 2.00	per month	57%
Clean Wind Development Fund		\$ 1.50	per month	43%
Total premium to customers		<u>\$ 3.50</u>	per month	<u>100%</u>
Effective January 1, 2013				
RECs		\$ 1.00	per month	40%
Clean Wind Development Fund		\$ 1.50	per month	60%
Total premium to customers		<u>\$ 2.50</u>	per month	<u>100%</u>

Renewable Usage/Green Source Option

Customers enrolling in the Renewable Usage Option (also called Green Source), pay a variable renewable power premium based on their monthly usage. The premium currently pays for RECs and administrative fees, according to the Tariff (Schedules 7 and 32). Only the Green Source customers contribute to administrative costs of the portfolio options program. Effective January 1, 2013, PGE reduced the price of the Clean Wind and Green Source options based on lower current and projected REC prices.

Table 2: Green Source				
Effective January 1, 2009 - 2012				
PGE administration		\$ 0.40	per MWh	3%
Program marketing and administration		\$ 3.10	per MWh	26%
RECs		\$ 6.00	per MWh	50%
Green Source Reserve Fund		\$ 2.50	per MWh	21%
Total premium to customers		<u>\$ 12.00</u>	per MWh	<u>100%</u>
Effective January 1, 2013				
PGE administration		\$ 0.40	per MWh	5%
Program marketing and administration		\$ 4.10	per MWh	51%
RECs		\$ 3.50	per MWh	44%
Green Source Reserve Fund		\$ -	per MWh	0%
Total premium to customers		<u>\$ 8.00</u>	per MWh	<u>100%</u>

Five percent of the Green Source customer payment is for PGE indirect services provided to the renewable power program (e.g., contracts management, finance and accounting, billing, call center support, marketing including web development, and regulatory affairs). The five percent is applied to PGE's Other Revenues, which is an offset to PGE's revenue requirement in a test year forecast. The 51% of the customer payment covers program marketing and administration (i.e., Green Mountain Energy contract) in addition to the costs of services provided by the PGE renewables program management.

Habitat Option

Customers enrolling in the Habitat option pay \$2.50 per month, 100% of which is distributed to a nonprofit agency for habitat restoration. The agency receiving the customer contributions for habitat is currently the Nature Conservancy.

PGE has not performed analyses to compare allocations to actual costs. Given that PGE has proposed a new portfolio option, Renewable Future Solar, PGE will be reviewing the allocation of costs for all the portfolio options.

Supplemental Response (Dated May 05, 2015)

In a telephone conversation with Staff April 30, 2015, Staff requested that PGE supplement this request and provide more information regarding: 1) the process by which PGE determined what back office support is provided to the renewables program and thus, a share of those costs paid by renewables customers; 2) how PGE determined that \$0.40 per MWh (5%) was an appropriate amount; and 3) whether PGE has evaluated the \$0.40 per MWh (5%) allocation amount to determine how it compares to the costs of back office services provided to the program.

- 1) After approval of the Green Source renewable option, PGE estimated administrative costs and support for the program, other than direct program management from the renewables program manager, to be about 5% and then determined the portion of the customer's payment (now \$0.40 per MWh). PGE has not found records or other documentation of this decision; rather it rests in the institutional memory of employees. At the time the amount was set, PGE intended to cover customer service, billing and shared services like legal and regulatory that was specific to the program.

With regard to the PGE back office support provided to the program, PGE identifies the following as providing support specific to the renewables programs: call center and customer service, billing and payment, accounting and budgeting, contracts management (support for RFP processes and standard contract terms), marketing (including web support). With regard to product development and general regulatory support, PGE views these as functions supported by all eligible customers.

- 2) See above. Due to PGE staff turnover and retirements, we have found no documentation that supports how the 5% was determined to be the appropriate amount.
- 3) PGE has not evaluated the \$0.40 or 5% allocation amount to determine how it compares with the actual or approximate costs of the support services provided to the program. Moving forward, PGE will evaluate the 5% allocation to determine if the percentage is adequate to cover the back office support provided to the program.

CASE: UE 294
WITNESS: MARIANNE GARDNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 700

OPENING TESTIMONY

June 15, 2015

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

2 A. My name is Marianne Gardner. My business address is 3930 Fairview
3 Industrial Dr. SE, Salem, Oregon 97302.

4 **Q. Please describe your educational background and work experience.**

5 A. I am a Senior Revenue Requirement Analyst employed in the Energy Rates,
6 Finance, and Audit Division of the Public Utility Commission of Oregon
7 (OPUC). My Witness Qualification Statement is found in Exhibit Staff/701.

8 **Q. What is the purpose of your testimony?**

9 A. I am the revenue requirements summary witness for the Public Utility
10 Commission of Oregon Staff (Staff) in this proceeding. As such, I explain
11 my adjustments and summarize the other Staff-sponsored adjustments and
12 issues regarding Portland General Electric's (PGE's or Company's) filing in
13 this docket, identified as UE 294, that remains contested. In addition, I
14 provide some detail regarding the partial settlement reached in principal in
15 the docket.

16 **Q. Did you prepare an exhibit for this docket?**

17 A. Yes. I prepared Exhibit Staff/702, consisting of 1 page.

18 **Q. How is your testimony organized?**

19 A. My testimony is organized as follows:

20 Part I – Revenue Requirement

21 Part II – Contested Issues

22 **Part I – Revenue Requirement**

23 **Q. Please provide a list of the rate case topics that Staff reviewed, identify**
24 **the Staff analyst who reviewed the topic, and the status of the topic.**

1 A. Listed in Table A is the requested information.

2 **Table A**

Staff	Settled	Contested	No Adjustment Required
Andrus B.		Portfolio Options Program	
Breish	Energy Efficiency		
Bahr	Medical Benefits, Pensions		Affiliated Interest Charges, Taxes Other Than Income
Bhattacharya		Marginal Generation Costs & Load Forecast	
Boyle	Fee Free Bankcard		
Compton	R&D	LRIC, Rate Spread and Rate Design	
Fonner		Marginal Customer Cost, Postage, and Load Forecast	
Gardner	Revenue Sensitive Rates, Uncollectible Expense, Escalation, Workforce Levels, Wages and Salaries, Incentives & Bonuses	Revenue Requirement, Interest Synchronization	Amortization Expense, Income Taxes, Accumulated Deferred Income Taxes, Working Capital, Miscellaneous Labor, Budgeting Process
Johnson	Construction Overheads, Sponsorships, Memberships, Dues and Donations	Trojan Refund - Schedule 143	Generation Expenses, Transmission and Distribution O&M Expense, Fuel Stock, Material and Supplies, Miscellaneous Deferred Debits, IT Projects, Environmental Remediation
Moore	Advertising		Marketing, Promotional Activities, Concessions, PCB Transformer Testing Project
Muldoon		Cost of Capital	
Ordonez	Carty Generation Station, Grassland Switchyard, Clackamas Surface Collector Project		Other Electric Plant Acquisitions
Wittekind	Various A&G and D&O		Existing Plant, Miscellaneous Rate Base, Rate Base Reductions

1 **Q. Please describe Table A.**

2 A. Table A describes three categories of issues. The first category is for settled
3 topics, and Staff will present separate testimony on those topics in support of
4 the partial stipulation in July. The second category is for contested issues, and
5 Staff is presenting individual testimony on those issues in its opening
6 testimony. The third category is for those topics that Staff investigated and
7 concluded no adjustment was necessary. For all three categories, Staff
8 reviewed the Company's filing, including the standard data request responses,
9 initiated an additional 347 data requests, and reviewed responses to parties
10 data requests.

11 **Q. Is there any other rate case topic that is not listed in Table A?**

12 A. Yes. Power Costs are included in PGE's requested base revenue
13 requirement. However, this issue has a separate schedule within Docket
14 UE 294 for which John Crider is the responsible Staff analyst.

15 **Q. Is there a difference between the revenue requirement for base rates**
16 **requested by PGE and the amount Staff proposed?**

17 A. Yes. To summarize, PGE requested an increase in revenue requirement
18 related to base rates of approximately \$38.75 million. This \$38.75 million
19 revenue requirement amount does not include PGE's requested revenue
20 requirement for the Carty project. For purposes of settlement, Staff proposed
21 15 adjustments to PGE's requested revenue requirement, 14 of which change
22 revenue requirement. Additionally, Staff identified several other issues with
23 PGE's filing. A partial settlement has been reached on some of Staff's

1 proposed adjustments. However, a proposed revenue requirement amount is
2 unavailable at this time.

3 **Q. Which parties have agreed to the partial settlement?**

4 A. PGE, Citizens Utility Board of Oregon (CUB), Industrial Customers of
5 Northwest Utilities (ICNU), Kroger Co. (Kroger), and Staff have agreed to the
6 settlement in principal. There may be other parties to the settlement as well.

7 **Q. Has a formal settlement agreement been filed with the OPUC?**

8 A. Not yet. However, the parties are currently drafting an agreement and will be
9 drafting supporting testimony as well.

10 **Q. Please list Staff's settled issues to the Company's filed general rate
11 case, and the associated adjustments.**

12 A. I have prepared the following two lists. Table B contains issues S-4, S-6,
13 S-8, S-11, and S-15, which stipulating parties settled collectively for
14 ratemaking purposes. For these issues, stipulating parties agreed that test
15 year expense will be reduced by a total of \$8 million, and rate base will be
16 reduced by \$9 million. Other terms will be fully explained in the partial
17 settlement. Staff's allocation of these amounts in Table B represents Staff's
18 perspective on the issues for illustrative purposes only, and does not
19 necessarily reflect the positions or views of the other parties to the partial
20 settlement regarding allocation of the agreed-upon reductions. I base this
21 assignment on the Commission's past practices and policies as applied in
22 previous rate cases and as applied by Staff in the current rate case.

1 Listed in Table C are the remaining settled issues, S-1, S-5, S-7, S-9, S-12,
2 S-13, and S-14, for which stipulating parties agreed to as well. Staff
3 assigned to these issues will explain each issue more fully in their
4 respective testimonies supporting the partial settlement.

5 **Table B**

Item	Staff	Description	Settled Collectively Adjustments (\$000)		
			Revenue	Expense	Rate Base
S-4	Gardner	Wages & Salaries		(\$4,326)	(\$1,824)
S-6	Wittekind	Various A&G		(\$1,195)	
S-8	Bahr	Pensions		(\$1,300)	(\$7,176)
S-11	Gardner	Escalation		(\$778)	
S-15	Boyle	Fee Free Bankcard		(\$401)	
		TOTAL		(\$8,000)	(\$9,000)

6 **Table C**

Item	Staff	Description	Settled Individually Adjustments (\$000)		
			Revenue	Expense	Rate Base
S-1	Gardner	Uncollectibles (rate = 0.4032%)		\$0	
S-5	Moore	Advertising		(\$70)	
S-7	Bahr	Medical Benefits		(\$992)	
S-9	Johnson	Dues and Donations		(\$194)	
S-12	Breish	Energy Efficiency		(\$237)	
S-13	Compton	R&D		(\$1,100)	
		TOTAL		(\$2,593)	

7 **Q. Will Staff provide testimony on the above settled items?**

8 A. Yes. I and other Staff will submit separate testimony in support of the settled
9 items in July.

1 **Q. Are there any other matters in PGE's UE 294 initial filing not resolved**
2 **through the above-described settled items that will impact 2016**
3 **revenues?**

4 A. Yes. There are three additional subjects presented in the filing that impact
5 revenues. The first is Power Costs. Power Costs are included in PGE's
6 requested base revenue requirement. However, this issue has a separate
7 schedule within Docket UE 294. Parties have filed the first round of testimony.
8 Staff witness John Crider filed opening testimony and Staff exhibits 100-105 on
9 May 28, 2015. The next step in the Power Cost schedule is PGE's filing of
10 reply testimony.

11 The second matter is regarding capital or rate base additions. Parties have
12 settled certain terms regarding capital additions, Clackamas Surface Collector
13 Project, Grassland Switchyard, and Carty. Parties have agreed to remove the
14 Grassland Switchyard capital costs from the Company's base business case,
15 and include these costs with Carty's gross plant. The Clackamas Surface
16 Collector Project will be included in the Company's rate base pending a PGE
17 officer attestation when Clackamas Surface Collector Project is placed in
18 service prior to January 1, 2016. Staff witness Ordonez will further explain in
19 his opening testimony, Exhibit 900.

20 Lastly, PGE has reduced their base revenue requirement request by \$56.2
21 million. Staff issued Data Request No. 181 and requested from the Company
22 further explanation of this reduction described as "Changes in Supplemental

1 Schedules” at the top of page 3 of PGE’s Executive Summary.¹ The
2 Company’s response entitled “Estimated Changes in Supplemental
3 Schedules:2016” is appended as Staff Exhibit 702. The revenue from these
4 supplemental schedules is independent of the base revenue requirement
5 request and base rates.

6 **Q. Does Staff agree with PGE’s proposed changes as shown in Exhibit**
7 **702?**

8 A. No. Staff questions PGE’s proposal concerning the Trojan nuclear fuel credit
9 contained in Schedule 143, Spent Fuel Adjustment. Staff witness Judy
10 Johnson offers testimony regarding this subject in Exhibit 800.

11 **Q. Does this conclude your testimony on the partial settlement?**

12 A. Yes.

13 Part II – Contested Issues

14 **Q. Please provide a listing of the responsible Staff witnesses for each**
15 **contested issue and the associated exhibit number.**

16 A. The table below provides the requested list.

17 **Table D**

Item	Staff Witness	Description	Status	Exhibit No.
S-0	Matt Muldoon	Cost of Capital	Contested	200
S-3	Marianne Gardner	Interest Synchronization	Contested	700
S-10	Jorge Ordonez	Capital Additions	Partial Settlement	900

¹ The Executive Summary is included with PGE’s initial filing of UE 294 Request for a General Rate Revision, February 12, 2015.

I-1	George Compton	LRIC, Rate Spread and Rate Design	Contested	300
I-4	Suparna Bhattacharya	Marginal Generation Costs & Load Forecast	Contested	400
I-5	Robert Fonner	Load Forecast	Contested	500
I-6	Robert Fonner	Marginal Customer Costs & Postage	Contested	500
I-8	Brittany Andrus	Portfolio Options Program	Contested	600
Sch. 143	Judy Johnson	Nuclear Fuel Credit	Contested	800

1 **Q. Will each Staff witness provide testimony on each of the above items?**

2 A. Yes. Each Staff witness identified in Table D will provide individual
3 testimony on each contested item for which they are responsible that will
4 clarify Staff's position.

5 **Q. Has Staff provided estimated adjustments to the 2015 test revenues,
6 expenses, or rate base dollars for any of these contested issues?**

7 A. Yes. Staff provides the following estimates. The proposed adjusted
8 amounts for the remaining contested items are still pending a final
9 determination. Staff witnesses will explain the amounts more fully in each of
10 their respective testimonies.

11 **Table E**

Item	Staff Witness	Description	Status	Proposed Adjustment (\$000)		
				Revenue	Expense	Rate Base
S-0	Muldoon	Cost of Capital	(Contested)	(\$32,074)		
S-3	Gardner	Interest Synchronization	(Contested)	\$2,694		
I-6	Fonner	Marginal Customer Cost/Postage	(Contested)			
Sch. 143	Johnson	Nuclear Fuel Credit	(Contested)	(\$17,344)		

1 **Q. Briefly describe the contested adjustment for Item S-3, Interest**
2 **Synchronization, for which you are responsible.**

3 A. According to long-standing Commission policy, for ratemaking purposes, Staff
4 routinely synchronizes interest expense to reflect changes to the regulated
5 utility's cost of capital as initially filed in a general rate case. This is consistent
6 with the treatment in PGE's last general rate case, UE 283. The Item S-3
7 adjustment depends on Staff witness Matt Muldoon's proposed adjustment
8 S-0, Cost of Capital. Mr. Muldoon has recommended in S-0 an adjustment to
9 the Company's filed cost of capital, of which the weighted cost of debt is a
10 component. Because interest expense on long-term debt is tax deductible, Mr.
11 Muldoon's proposed weighted cost of debt impacts income tax expense for
12 ratemaking purposes. Once parties agree on the weighted cost of debt,
13 interest must be coordinated or synchronized to determine the related
14 adjustment for the income tax calculation.

15 The amount is calculated on the base year as follows:

16 + Net Rate Base

17 X Staff's Recommended (or Authorized) Weighted Cost of Debt

18 = Allowable Interest Deduction

19 - Company's Reported Interest Deduction

20 = Interest Coordination Adjustment

21 **Q. Does this conclude your testimony?**

22 A. Yes.

CASE: UE 294
WITNESS: MARIANNE GARDNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 701

Witness Qualification Statement

June 15, 2015

WITNESS QUALIFICATION STATEMENT

NAME: Marianne Gardner

EMPLOYER: Public Utility Commission of Oregon

TITLE: Senior Revenue Requirement Analyst
Rates, Finance & Audit

ADDRESS: 3930 Fairview Industrial Dr SE, Oregon 97308-1088

EDUCATION: Master of Business Administration
Oregon State University, Corvallis, Oregon

Bachelor of Science in Accounting
Montana State University, Bozeman, Montana

CPA, Oregon

EXPERIENCE: I have been employed by the Public Utility Commission of Oregon since March 2013, with my current position being a Senior Revenue Requirement Analyst, in the Energy - Rates, Finance and Audit Division. My responsibilities include research, analysis, and recommendations on a range of cost, revenue and policy issues for electric and natural gas utilities. As the revenue requirement summary witness, I have provided testimony in dockets UE 263, UG 246, UE 283, and UG 284.

I have approximately 20 years of professional accounting experience, including:

- Thirteen years as a cost accountant with responsibilities including cost accounting, budgeting, product costing, and the preparation of management reports;
- Four years experience in public accounting working in the areas of audit, tax and financial accounting for individual and small business clientele; and,
- Three years experience in non-profit accounting for an agency administering funds under the Federal Job Training Partnership Act.

CASE: UE 294
WITNESS: MARIANNE GARDNER

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 702

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

Estimated Changes in Supplemental Schedules: 2016*

Schedule	Annual change	Comments
Schedule 102 Regional Power Act Exchange Credit	(\$14,679,957)	Updated every other year for BPA's Average System Cost process
Schedule 105 Regulatory Adjustments	\$6,714,409	Updated annually
Schedule 123 Decoupling Adjustment	(\$10,972,035)	Updated annually
Schedule 143 Spent Fuel Adjustment	(\$11,043,570)	DOE refund should be fully amortized at end of 2016 and price set to zero January 1, 2017
Schedule 144 Capital Projects Adjustment	(\$26,233,022)	Should be fully amortized at end of 2015 and price set to zero January 1, 2016
Total Estimated Change in Supplementals	(\$56,214,175)	

* For more information, see PGE Exhibit 1400, Section IV. Pricing, Other Rate Schedule Changes

CASE: UE 294
WITNESS: JUDY JOHNSON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 800

OPENING TESTIMONY

June 15, 2015

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Judy Johnson. I am a Senior Economist at the Public Utility
3 Commission of Oregon. My business address is 3930 Fairview Industrial Dr.
4 SE, Salem, Oregon 97302.

5 **Q. Please describe your educational background and work experience.**

6 A. My Witness Qualification Statement is found in Exhibit Staff/801.

7 **Q. What is the purpose of your testimony?**

8 A. I will provide testimony opposing Portland General Electric's (PGE) proposal
9 for Schedule 143, Spent Fuel Adjustment.

10 **Q. Did you prepare an exhibit for this docket?**

11 A. Yes. I prepared Exhibit Staff/802, consisting of 1 page.

12 **Q. What issues did you cover in this Docket?**

13 A. I analyzed Issues S-9 Dues and Donations, I-2 Construction Overheads, I-7
14 Coal Inventory, and Schedule 143, Spent Fuel Adjustment.

15 **Q. What was the outcome of the other three issues that are not covered in
16 this testimony?**

17 A. Issues S-9, I-2, and I-7 are part of a partial stipulation that will be filed in the
18 docket or have otherwise been resolved..

19 **Q. Did you write data requests for additional information about the three
20 issues not covered in this testimony?**

21 A. Yes. Issue S-9, Dues and Donations, had six data requests that were sent to
22 PGE. Issue I-2, Construction Overheads, had 10 data requests that were sent

1 to PGE. Issue I-7, Coal Inventory, had 14 data requests that were sent to
2 PGE. PGE answered all data requests.

3 **Q. Will you be discussing these three issues that have been settled in**
4 **other testimony?**

5 A. Yes. Staff will be preparing testimony in support of the partial stipulation
6 reached in this docket. I will prepare testimony supporting the settlement
7 reached on the three issues discussed previously. The fourth issue, Schedule
8 143, Spent Fuel Adjustment is a contested adjustment and I will discuss that
9 issue in this testimony.

10 **Q. Please explain what Schedule 143, Spent Fuel Adjustment represents.**

11 A. In Docket UE 283, PGE offered to amortize over three years the refund from
12 the Department of Energy (DOE) pertaining to the Trojan Nuclear
13 Decommissioning Trust.

14 **Q. Is PGE proposing something different in the current Docket UE 294?**

15 A. Yes. PGE is now proposing to change the amortization from three years to two
16 years.

17 **Q. Doesn't this change help protect customers from increased rates on**
18 **January 1, 2016?**

19 A. Yes. However, on January 1, 2017, the refund will have been completely
20 amortized back to customers and these same customers will see an automatic
21 rate increase in rates due solely to the refund's completion.

22 **Q. What is Staff proposing?**

1 A. Staff is proposing to leave the amortization at three years. This will mean a
2 smaller rate decrease now and a smaller rate increase when the amortization
3 is complete. Customers will not see the increase in their bills until January 1,
4 2018.

5 **Q. Please explain how Exhibit 802 ties into Staff's recommendation?**

6 A. Exhibit 802 is PGE's response to Staff data request number 262. This Exhibit
7 shows how PGE's proposal would work. The first chart shows how the account
8 is being amortized in 2015. The chart shows that PGE expects to credit
9 customers \$17.3 million in 2015. The second chart shows PGE's proposed
10 credit for 2016 of \$34.0 million.

11 **Q. How does Staff's proposal change that?**

12 A. Staff proposal is to credit customers an equal amount spread over three years.
13 Staff proposes to credit customers \$17.0 million in 2015, 2016, and 2017. On
14 January 1, 2018, when the account is zero, customer's rates will increase by
15 \$17.0 million because the credit is finished. Under PGE's proposal the account
16 is zeroed out at the end of 2016 and on January 1, 2017, customer's rates will
17 increase by \$34.0 million because the credit is finished.

18 **Q. Is it true that under either proposal customer's rates will automatically**
19 **increase?**

20 A. Yes. However, under PGE's proposal the increase is \$34.0 million on January
21 1, 2017, and under Staff's proposal the increase would only be \$17.0 million
22 and that would not happen until January 1, 2018.

23 **Q. Overall, why does Staff believe its proposal should be preferred?**

1 A. Staff believes its proposal results in less of a rate shock to customers.

2 **Q. Does this conclude your testimony?**

3 A. Yes.

CASE: UE 294
WITNESS: JUDY JOHNSON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 801

Witness Qualifications Statement

June 15, 2015

WITNESS QUALIFICATION STATEMENT

NAME: JUDY A. JOHNSON

EMPLOYER: PUBLIC UTILITY COMMISSION OF OREGON

TITLE: SENIOR ECONOMIST IN ENERGY, RATES, FINANCE, AND AUDIT

ADDRESS: 3930 FAIRVIEW INDUSTRIAL DR. SE, SALEM, OREGON 97308-1088

EDUCATION: MBA with an emphasis in Statistics from Eastern Washington University Cheney, Washington

BA in Accounting from Eastern Washington University Cheney, Washington

EXPERIENCE:

3/95-Present I have been employed by the Public Utility Commission of Oregon since March of 1995. My current position being a Senior Economist in the Utility Program's Energy - Rates, Finance, and Audit Division.

6/77-2/95 I was employed by Avista Corporation, an electric and natural gas utility located in Spokane, Washington. The majority of my employment was spent in the Rates and Regulatory Affairs Department as a Senior Rate Analyst. I have prepared testimony and exhibits in numerous electric and natural gas rate cases, primarily in the area of results of operations and revenue requirement.

CASE: UE 294
WITNESS: JUDY JOHNSON

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 802

**Exhibits in Support
Of Opening Testimony**

June 15, 2015

Staff/802
Johnson/1

Calculation of Revenues at Current Prices

Schedules	Sch 143 MWh	Current Prices		Current Revenues		Revenues
		Part A mills/kWh	Part B mills/kWh	Part A Revenues	Part B Revenues	at Current Prices
Schedule 7	7,620,805	(0.96)	(0.31)	(\$7,315,973)	(\$2,362,450)	(\$9,678,423)
Schedule 15	16,308	(0.76)	(0.25)	(\$12,394)	(\$4,077)	(\$16,471)
Schedule 32	1,599,950	(0.89)	(0.29)	(\$1,423,956)	(\$463,986)	(\$1,887,941)
Schedule 38	39,036	(0.90)	(0.29)	(\$35,132)	(\$11,320)	(\$46,453)
Schedule 47	20,845	(1.09)	(0.35)	(\$22,721)	(\$7,296)	(\$30,017)
Schedule 49	62,677	(1.05)	(0.34)	(\$65,811)	(\$21,310)	(\$87,122)
Schedule 83-S	2,795,179	(0.89)	(0.29)	(\$2,487,710)	(\$810,602)	(\$3,298,312)
Schedule 85-S	2,464,564	(0.86)	(0.28)	(\$2,119,525)	(\$690,078)	(\$2,809,603)
Schedule 85-P	713,162	(0.84)	(0.27)	(\$599,056)	(\$192,554)	(\$791,610)
Schedule 89-S	0	(0.82)	(0.27)	\$0	\$0	\$0
Schedule 89-P	851,370	(0.80)	(0.26)	(\$681,096)	(\$221,356)	(\$902,452)
Schedule 89-T	63,435	(0.79)	(0.25)	(\$50,114)	(\$15,859)	(\$65,972)
Schedule 75-T	19,637	(0.79)	(0.25)	(\$15,513)	(\$4,909)	(\$20,423)
Schedule 90-P	1,498,007	(0.78)	(0.25)	(\$1,168,446)	(\$374,502)	(\$1,542,948)
Schedule 91/95	74,544	(0.76)	(0.25)	(\$56,654)	(\$18,636)	(\$75,290)
Schedule 92	3,243	(0.80)	(0.26)	(\$2,594)	(\$843)	(\$3,437)
Schedule 485-S	438,339	(0.86)	(0.28)	(\$376,971)	(\$122,735)	(\$499,706)
Schedule 485-P	273,576	(0.84)	(0.27)	(\$229,804)	(\$73,866)	(\$303,670)
Schedule 489-S	14,393	(0.82)	(0.27)	(\$11,802)	(\$3,886)	(\$15,688)
Schedule 489-P	533,149	(0.80)	(0.26)	(\$426,519)	(\$138,619)	(\$565,138)
Schedule 489-T	305,980	(0.79)	(0.25)	(\$241,724)	(\$76,495)	(\$318,219)
Totals	19,408,200			(\$17,343,516)	(\$5,615,378)	(\$22,958,893)

Calculation of Revenues at Proposed Prices

Schedules	Sch 143 MWh	Proposed Prices		Proposed Revenues		Revenues
		Part A mills/kWh	Part B mills/kWh	Part A Revenues	Part B Revenues	at Proposed Prices
Schedule 7	7,620,805	(1.88)	0.00	(\$14,327,114)	\$0	(\$14,327,114)
Schedule 15	16,308	(1.52)	0.00	(\$24,788)	\$0	(\$24,788)
Schedule 32	1,599,950	(1.76)	0.00	(\$2,815,913)	\$0	(\$2,815,913)
Schedule 38	39,036	(1.90)	0.00	(\$74,168)	\$0	(\$74,168)
Schedule 47	20,845	(1.76)	0.00	(\$36,687)	\$0	(\$36,687)
Schedule 49	62,677	(1.90)	0.00	(\$119,087)	\$0	(\$119,087)
Schedule 83-S	2,795,179	(1.72)	0.00	(\$4,807,709)	\$0	(\$4,807,709)
Schedule 85-S	2,464,564	(1.69)	0.00	(\$4,165,114)	\$0	(\$4,165,114)
Schedule 85-P	713,162	(1.65)	0.00	(\$1,176,717)	\$0	(\$1,176,717)
Schedule 89-S	0	(1.66)	0.00	\$0	\$0	\$0
Schedule 89-P	851,370	(1.61)	0.00	(\$1,370,705)	\$0	(\$1,370,705)
Schedule 89-T	63,435	(1.58)	0.00	(\$100,227)	\$0	(\$100,227)
Schedule 75-T	19,637	(1.58)	0.00	(\$31,027)	\$0	(\$31,027)
Schedule 90-P	1,498,007	(1.52)	0.00	(\$2,276,971)	\$0	(\$2,276,971)
Schedule 91/95	74,544	(1.52)	0.00	(\$113,308)	\$0	(\$113,308)
Schedule 92	3,243	(1.55)	0.00	(\$5,026)	\$0	(\$5,026)
Schedule 485-S	438,339	(1.69)	0.00	(\$740,792)	\$0	(\$740,792)
Schedule 485-P	273,576	(1.65)	0.00	(\$451,401)	\$0	(\$451,401)
Schedule 489-S	14,393	(1.66)	0.00	(\$23,892)	\$0	(\$23,892)
Schedule 489-P	533,149	(1.61)	0.00	(\$858,370)	\$0	(\$858,370)
Schedule 489-T	305,980	(1.58)	0.00	(\$483,448)	\$0	(\$483,448)
Totals	19,408,200			(\$34,002,464)	\$0	(\$34,002,464)

CASE: UE 294
WITNESS: JORGE ORDONEZ

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 900

Opening Testimony

June 15, 2015

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Jorge Ordonez. I am employed by the Public Utility Commission of
3 Oregon (OPUC) as a Senior Financial Economist in the Energy Resources and
4 Planning Division. My business address is 3930 Fairview Industrial Dr. SE,
5 Salem, Oregon 97302-1166.

6 **Q. Please describe your educational background and work experience.**

7 A. My Witness Qualifications Statement is found in Exhibit Staff/901, Ordonez /1.

8 **Q. What is the purpose of your testimony?**

9 A. The purpose of my testimony is twofold: first, to review Portland General
10 Electric's (PGE's or Company's) request that the OPUC include in rates the
11 costs of the Carty Generation Station (Carty) when placed in service, and
12 second, to review the Company's capital additions intended to be put into the
13 rate base before rates enter into effect on January 1, 2016.

14 In conducting the aforementioned review, Staff referred to the Company's initial
15 filing and approximately 40 initial and follow-up data requests (DRs).

16 **Q. Have you prepared an exhibit for this docket?**

17 A. Yes, I have prepared Exhibit Staff/901; Witness Qualification Statement.

18 **SUMMARY RECOMMENDATION**

19 **Q. What are your summary findings and recommendations?**

20 A. Regarding the inclusion in rates of the costs of Carty when placed in service,
21 Staff and Parties have reached a stipulation regarding this topic, agreeing that
22 PGE's decision to construct Carty was prudent and recommending that the
23 Commission approve the Carty tariff rider requested by PGE to reflect the

1 prudently-incurred costs and benefits of the plant when it begins providing
2 service to customers, with multiple conditions.

3 Regarding PGE's capital additions, Staff and Parties have reached a stipulation
4 regarding two major capital additions raised by Staff in settlement negotiations:
5 the Grassland Switchyard and the Clackamas PME – Surface Collector C
6 project (Clackamas Surface Collector Project). As for the Grassland
7 Switchyard, the net rate base of this project of \$24.686 million will be removed
8 from the year-end 2015 rate base until Carty is in service. As for the
9 Clackamas Surface Collector Project, when this project is placed in service,
10 PGE will file an attestation from an officer that the plant has been placed in
11 service.

12 Staff will provide testimony supporting the aforementioned stipulated issues at a
13 later date.

14 **Q. What other matter, if any, would you like to address?**

15 A. Staff anticipates that other parties may file testimony regarding PGE's request,
16 particularly regarding capital additions to rate base. Staff reserves the right to
17 address this in its next round of testimony.

18 **Q. Does this conclude your testimony?**

19 A. Yes.

CASE: UE 294
WITNESS: JORGE ORDONEZ

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 901

Witness Qualification Statement

June 15, 2014

WITNESS QUALIFICATION STATEMENT

NAME Jorge D. Ordonez

EMPLOYER Public Utility Commission of Oregon

TITLE Senior Financial Economist, Energy Resources and Planning Division

ADDRESS 3930 Fairview Industrial Dr SE, Salem, Oregon 97302-1166

EDUCATION AND TRAINING

Utility Management Certificate
Willamette University, Oregon, 2008

Certificate in Management of Hydropower Development
Swedish International Development Cooperation Agency, Sweden,
2006 & South Africa, 2007

Fulbright Scholar, MBA, concentration in finance
Willamette University, Oregon, 2005

Certificate in Project Appraisal and Management
Maastricht School of Management, Netherlands, 2002

BS, Mechanical Engineering, thermal power efficiency
Electrical & Mechanical Engineering School
San Antonio Abad University, Peru, 1998

EXPERIENCE

I received a Bachelors of Science degree in Mechanical Engineering from San Antonio Abad University in Cusco, Peru in 1998. Subsequently, as a Fulbright Scholar, I received an MBA with an emphasis in finance from Willamette University in 2005. From 1999 to 2008, I worked for a Peruvian power generation company and was promoted many times, working as an Engineer, Resource Scheduler, Manager of Economic Planning and Vice-President of Generation, Commercial and Trading. Since January 2009, I have been employed by the Public Utility Commission of Oregon as a Senior Financial Economist, evaluating utilities' issuance of securities, cost of capital, mergers and acquisitions, property sales, cost of service studies, marginal cost studies, rate spread and rate design, integrated resource plans, purchased gas costs, and power costs.

CERTIFICATE OF SERVICE

UE 294

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-001-0180, to the following parties or attorneys of parties.

Dated this 15th day of June, 2015, at Salem, Oregon.

Kay Barnes

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Public Utility Commission
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