

Direct Testimony and Schedules
Dylan W. D'Ascendis

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Northern States Power Company
for Authority to Increase Rates for Electric Service in Minnesota

Docket No. E002/GR-21-630

Exhibit___(DWD-1)

Rate of Return

October 25, 2021

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1 I. INTRODUCTION AND PURPOSE

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Q. PLEASE STATE YOUR NAME AND OCCUPATION.

A. My name is Dylan W. D’Ascendis. I am employed by ScottMadden, Inc. as Partner. My business address is 3000 Atrium Way, Suite 200, Mount Laurel, NJ 08054.

Q. ON WHOSE BEHALF ARE YOU SUBMITTING THIS TESTIMONY?

A. I am submitting this direct testimony (referred to throughout as my Direct Testimony) before the Minnesota Public Utilities Commission (Commission) on behalf of Northern States Power, a Minnesota corporation (NSP or the Company).

Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

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

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

1 fund, respectively, comprised of the common stocks of the publicly traded
2 corporate members of the AGA.

3
4 I am a member of the Society of Utility and Regulatory Financial Analysts
5 (SURFA). In 2011, I was awarded the professional designation “Certified Rate
6 of Return Analyst” by SURFA, which is based on education, experience, and
7 the successful completion of a comprehensive written examination.

8
9 I am also a member of the National Association of Certified Valuation Analysts
10 (NACVA) and was awarded the professional designation “Certified Valuation
11 Analyst” by NACVA in 2015.

12
13 I am a graduate of the University of Pennsylvania, where I received a Bachelor
14 of Arts degree in Economic History. I have also received a Master of Business
15 Administration with high honors and concentrations in Finance and
16 International Business from Rutgers University.

17
18 The details of my educational background and expert witness appearances are
19 shown in Appendix A.

20
21 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

22 A. The purpose of my testimony is to present evidence on behalf of the Company
23 and recommend an appropriate return on common equity (ROE) on the
24 Company’s Minnesota jurisdictional rate base.

1 Q. HAVE YOU PREPARED AN EXHIBIT IN SUPPORT OF YOUR RECOMMENDATION?

2 A. Yes. I have prepared Exhibit__(DWD-1), which contains Schedules 1 through
3 12, and was prepared by me or under my direction.

4

5 **II. SUMMARY**

6

7 Q. PLEASE SUMMARIZE YOUR RECOMMENDED ROE.

8 A. My recommended ROE of 10.20% is summarized on Exhibit__(DWD-1),
9 Schedule 1. In determining my recommendation, I assessed the market-based
10 common equity cost rates of companies of relatively similar, but not necessarily
11 identical, risk to the Company. Using companies of relatively comparable risk
12 as proxies is consistent with the principles of fair rate of return established in
13 the *Hope*¹ and *Bluefield*² decisions, which I discuss further in Section III, below.
14 Of course, no proxy group can be identical in risk to any single company.
15 Consequently, there must be an evaluation of relative risk between the
16 Company and the proxy group to determine if it is appropriate to adjust the
17 proxy group's indicated rate of return.

18

19 My recommendation results from applying and considering several cost of
20 common equity models, specifically the Constant Growth Discounted Cash
21 Flow (DCF) model, the Risk Premium Model (RPM), and the Capital Asset
22 Pricing Model (CAPM), to the market data of the Utility Proxy Group whose
23 selection criteria will be discussed below. In addition, I applied these same

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

2 *Bluefield Water Works Improvement Co. v. Public Serv. Comm'n*, 262 U.S. 679 (1922) (*Bluefield*).

1 models to a Non-Price Regulated Proxy Group. The results derived from these
2 analyses are as follows:

3
4 **Table 1**
5 **Summary of Common Equity Cost Rates³**
6

7 Discounted Cash Flow Model	8.78%
8 Risk Premium Model	10.95%
9 Capital Asset Pricing Model	12.53%
10 Cost of Equity Models Applied to Comparable 11 Risk, Non-Price Regulated Companies	<u>12.24%</u>
12 Indicated Range of Common Equity Cost Rates 13 Before Adjustments	<u>9.65% - 11.65%</u>
14 Business Risk Adjustment	0.05%
15 Credit Risk Adjustment	-0.13%
16 Flotation Cost Adjustment	0.12%
17 Indicated Range of Common Equity Cost Rates 18 after Adjustment	<u>9.69% - 11.69%</u>
19 Recommended Cost of Common Equity	<u>10.20%</u>

20 The indicated range of common equity cost rates applicable to the Utility Proxy
21 Group is between 9.65% and 11.65% before any Company-specific
22 adjustments.⁴ I then adjusted the indicated common equity cost rate upward by
23 0.05% to reflect the Company's greater relative business risk and downward by
24 0.13% to account for a less risky bond rating, as compared to the Utility Proxy

3 *See*, Section VII for a detailed discussion regarding the application of my cost of common equity
models.

4 The indicated range is equal to 100 basis points above and below the midpoint of my four model
results.

1 Group. I also adjusted the indicated common equity cost rate upward by 0.12%
2 to account for flotation costs.⁵ These adjustments resulted in a Company-
3 specific indicated range of common equity cost rates between 9.69% and
4 11.69%. I recommend an ROE for the Company toward the lower end of my
5 Company-specific range, specifically 10.20%.

6
7 Q. PLEASE SUMMARIZE THE COMPANY'S PROPOSED CAPITAL STRUCTURE.

8 A. The Company is proposing a capital structure including 52.50% common
9 equity, 46.89% long-term debt, and 0.61% short-term debt. That capital
10 structure is consistent with the Company's historical capital structures, the
11 capital structures of the Utility Proxy Group, and the operating subsidiary
12 companies of the Utility Proxy Group.

13
14 Q. HOW IS THE REMAINDER OF YOUR DIRECT TESTIMONY ORGANIZED?

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

- 16 • *Section III* – Provides a summary of financial theory and regulatory principles
17 pertinent to the development of the Cost of Capital;
- 18 • *Section IV* – Explains my selection of the Utility Proxy Group used to develop
19 my analytical results;
- 20 • *Section V* – Explains the proposed capital structure;
- 21 • *Section VI* – Discusses the reasonability of the Company's proposed long-term
22 debt cost rate;
- 23 • *Section VII* – Describes the analyses on which my recommendation is based;

5 *See*, Section IX for a detailed discussion of my cost of common equity adjustments.

- 1 • *Section VIII* – Summarizes my common equity cost rate before adjustments to
- 2 reflect Company-specific factors;
- 3 • *Section IX* – Explains my adjustments to my common equity cost rate to reflect
- 4 the Company-specific factors; and
- 5 • *Section X* – Presents my conclusions.

6

7 III. GENERAL PRINCIPLES

8

9 Q. WHAT PRINCIPLES HAVE YOU CONSIDERED IN ARRIVING AT YOUR
10 RECOMMENDATIONS?

11 A. In unregulated industries, marketplace competition is the principal determinant
12 of the price of products or services. For regulated public utilities, regulation
13 must act as a substitute for marketplace competition. Assuring that the utility
14 can fulfill its obligations to the public, while providing safe and reliable service
15 at all times, requires a level of earnings sufficient to maintain the integrity of
16 presently invested capital. Sufficient earnings also permit the attraction of
17 needed new capital at a reasonable cost, for which the utility must compete with
18 other firms of comparable risk, consistent with the fair rate of return standards
19 established by the U.S. Supreme Court in the previously cited *Hope* and *Bluefield*
20 cases.

21

22 The U.S. Supreme Court affirmed the fair rate of return standards in *Hope*, when
23 it stated:

24 The rate-making process under the Act, *i.e.*, the fixing of ‘just and
25 reasonable’ rates, involves a balancing of the investor and the consumer

1 interests. Thus we stated in the Natural Gas Pipeline Co. case that
2 ‘regulation does not insure that the business shall produce net revenues.’
3 315 U.S. at page 590, 62 S.Ct. at page 745. But such considerations aside,
4 the investor interest has a legitimate concern with the financial integrity of
5 the company whose rates are being regulated. From the investor or
6 company point of view it is important that there be enough revenue not
7 only for operating expenses but also for the capital costs of the business.
8 These include service on the debt and dividends on the stock. Cf. Chicago
9 & Grand Trunk R. Co. v. Wellman, 143 U.S. 339, 345, 346 12 S.Ct.
10 400,402. By that standard the return to the equity owner should be
11 commensurate with returns on investments in other enterprises having
12 corresponding risks. That return, moreover, should be sufficient to assure
13 confidence in the financial integrity of the enterprise, so as to maintain its
14 credit and to attract capital.⁶

15 In summary, the U.S. Supreme Court has found a return that is adequate to
16 attract capital at reasonable terms enables the utility to provide service while
17 maintaining its financial integrity. As discussed above, and in keeping with
18 established regulatory standards, that return should be commensurate with the
19 returns expected elsewhere for investments of equivalent risk. The
20 Commission’s decision in this proceeding, therefore, should provide the
21 Company with the opportunity to earn a return that is: (1) adequate to attract
22 capital at reasonable cost and terms; (2) sufficient to ensure its financial integrity;

6 *Hope*, 320 U.S. 591 (1944), at 603.

1 and (3) commensurate with returns on investments in enterprises having
2 corresponding risks.

3
4 Lastly, the required return for a regulated public utility is established on a stand-
5 alone basis, i.e., for the utility operating company at issue in a rate case. Parent
6 entities, like other investors, have capital constraints and must look at the
7 attractiveness of the expected risk-adjusted return of each investment
8 alternative in their capital budgeting process. That is, utility holding companies
9 that own many utility operating companies have choices as to where they will
10 invest their capital within the holding company family. Therefore, the
11 opportunity cost concept applies regardless of whether the funding source is
12 public or corporate.

13
14 When funding is provided by a parent entity, the return still must be sufficient
15 to provide an incentive to allocate equity capital to the subsidiary or business
16 unit rather than other internal or external investment opportunities. That is, the
17 regulated subsidiary must compete for capital with all the parent company's
18 affiliates, and with other similar risk companies, which may include non-utilities.
19 In that regard, investors value corporate entities on a sum-of-the-parts basis and
20 expect each division within the parent company to provide an appropriate risk-
21 adjusted return.

22
23 It therefore is important that the authorized ROE for the Company reflects the
24 risks and prospects of its operations and supports its financial integrity from a
25 stand-alone perspective.

1 Q. WITHIN THAT BROAD FRAMEWORK, HOW IS THE COST OF CAPITAL ESTIMATED
2 IN REGULATORY PROCEEDINGS?

3 A. Regulated utilities primarily use common stock and long-term debt to finance
4 their permanent property, plant, and equipment (*i.e.*, rate base). The fair rate of
5 return for a regulated utility is based on its weighted average cost of capital
6 (WACC), in which the costs of the individual sources of capital are weighted by
7 their respective book values.

8

9 The cost of capital is the return investors require to make an investment in a
10 firm. Investors will provide funds to a firm only if the return that they *expect* is
11 equal to, or greater than, the return that they *require* to accept the risk of
12 providing funds to the firm.

13

14 The cost of capital (that is, the combination of the costs of debt and equity) is
15 based on the economic principle of “opportunity costs.” The principle of
16 opportunity costs recognizes that investing in any asset (whether debt or equity
17 securities) represents a forgone opportunity to invest in alternative assets. For
18 any investment to be sensible, its expected return must be at least equal to the
19 return expected on alternative investment opportunities with comparable risks.
20 Because investments with like risks should offer similar returns, the opportunity
21 cost of an investment should equal the return available on an investment of
22 comparable risk.

23

24 The cost of debt is contractually defined and can be directly observed as the
25 interest rate or yield on debt securities. However, the cost of equity must be

1 estimated based on market data and various financial models. Because the cost
2 of equity is premised on opportunity costs, the models used to determine it are
3 typically applied to a group of “comparable” or “proxy” companies.

4
5 In the end, the estimated cost of capital should reflect the return that investors
6 require in light of the subject company’s business and financial risks, and the
7 returns available on comparable investments.

8
9 **A. Business Risk**

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

12 A. The investor-required return on common equity reflects investors’ assessment
13 of the total investment risk of the subject firm. Total investment risk is often
14 discussed in the context of business and financial risk.

15
16 Business risk reflects the uncertainty associated with owning a company’s
17 common stock without the company’s use of debt and/or preferred stock
18 financing. One way of considering the distinction between business and
19 financial risk is to view the former as the uncertainty of the expected earned
20 return on common equity, assuming the firm is financed with no debt.

21 Examples of business risks generally faced by utilities include, but are not
22 limited to, the regulatory environment, mandatory environmental compliance
23 requirements, customer mix and concentration of customers, service territory
24 economic growth, market demand, operations, capital intensity, size, the degree
25 of operating leverage, emerging technologies including distributed energy

1 resources, the vagaries of weather, and the like, all of which have a direct bearing
2 on earnings.

3
4 Although analysts, including rating agencies, may categorize business risks
5 individually, as a practical matter, such risks are interrelated and not wholly
6 distinct from one another. When determining an appropriate return on
7 common equity, the relevant issue is where investors see the subject company
8 in relation to other similarly situated utility companies (i.e., the Utility Proxy
9 Group). To the extent investors view a company as being exposed to higher
10 risk, the required return will increase, and vice versa.

11
12 For regulated utilities, business risks are both long-term and near-term in nature.
13 Whereas near-term business risks are reflected in year-to-year variability in
14 earnings and cash flow brought about by economic or regulatory factors, long-
15 term business risks reflect the prospect of an impaired ability of investors to
16 obtain both a fair rate of return on, and return of, their capital. Moreover,
17 because utilities accept the obligation to provide safe, adequate, and reliable
18 service at all times (in exchange for a reasonable opportunity to earn a fair return
19 on their investment), they generally do not have the option to delay, defer, or
20 reject capital investments. Because those investments are capital-intensive,
21 utilities generally do not have the option to avoid raising external funds. The
22 obligation to serve and the corresponding need to access capital is even more
23 acute during periods of capital market distress.

1 Because utilities invest in long-lived assets, long-term business risks are of
2 paramount concern to equity investors. That is, the risk of not recovering the
3 return on their investment extends far into the future. The timing and nature
4 of events that may lead to losses, however, also are uncertain and, consequently,
5 those risks and their implications for the required return on equity tend to be
6 difficult to quantify. Regulatory commissions (like investors who commit their
7 capital) must review a variety of quantitative and qualitative data and apply their
8 reasoned judgment to determine how long-term risks weigh in their assessment
9 of the market-required return on common equity.

10
11 **B. Financial Risk**

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

14 A. Financial risk is the additional risk created by the introduction of debt and
15 preferred stock into the capital structure. The higher the proportion of debt
16 and preferred stock in the capital structure, the higher the financial risk to
17 common equity owners (*i.e.*, failure to receive dividends due to default or other
18 covenants). Therefore, consistent with the basic financial principle of risk and
19 return, common equity investors require higher returns as compensation for
20 bearing higher financial risk.

21
22 Q. CAN BOND AND CREDIT RATINGS BE A PROXY FOR A FIRM'S COMBINED BUSINESS
23 AND FINANCIAL RISKS TO EQUITY OWNERS (I.E., TOTAL INVESTMENT RISK)?

24 A. Yes, similar bond ratings/issuer credit ratings reflect, and are representative of,
25 similar combined business and financial risks (*i.e.*, total investment risk) faced

1 by bond investors.⁷ Although specific business or financial risks may differ
2 between companies, the same bond/credit rating indicates that the combined
3 risks are roughly similar from a debtholder perspective. The caveat is that these
4 debtholder risk measures do not translate directly to risks for common equity.

6 IV. NSP AND THE UTILITY PROXY GROUP

7
8 Q. WHY IS IT NECESSARY TO DEVELOP A PROXY GROUP WHEN ESTIMATING THE
9 ROE FOR THE COMPANY?

10 A. Because the Company is not publicly traded and does not have publicly traded
11 equity securities, it is necessary to develop groups of publicly traded,
12 comparable companies to serve as “proxies” for the Company. In addition to
13 the analytical necessity of doing so, the use of proxy companies is consistent
14 with the *Hope* and *Bluefield* comparable risk standards, as discussed above. I have
15 selected two proxy groups that, in my view, are fundamentally risk-comparable
16 to the Company: A Utility Proxy Group and a Non-Price Regulated Proxy
17 Group, which is comparable in total risk to the Utility Proxy Group.⁸

18
19 Even when proxy groups are carefully selected, it is common for analytical
20 results to vary from company to company. Despite the care taken to ensure
21 comparability, because no two companies are identical, market expectations

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

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

1 regarding future risks and prospects will vary within the proxy group. It
2 therefore is common for analytical results to reflect a seemingly wide range,
3 even for a group of similarly situated companies. At issue is how to estimate
4 the ROE from within that range. That determination will be best informed by
5 employing a variety of sound analyses and necessarily must consider the sort of
6 quantitative and qualitative information discussed throughout my Direct
7 Testimony. Additionally, a relative risk analysis between the Company and the
8 Utility Proxy Group must be made to determine whether or not explicit
9 Company-specific adjustments need to be made to the Utility Proxy Group
10 indicated results.

11
12 My analyses are based on the Utility Proxy Group, containing U.S. electric
13 utilities. As discussed earlier, utilities must compete for capital with other
14 companies with commensurate risk (including non-utilities) and, to do so, must
15 be provided the opportunity to earn a fair and reasonable return. Consequently,
16 it is appropriate to consider the Utility Proxy Group's market data in
17 determining the Company's ROE.

18
19 Q. PLEASE SUMMARIZE THE COMPANY'S OPERATIONS.

20 A. NSP is a vertically integrated electric and natural gas utility that provides electric
21 generation, transmission, and distribution service, as well as natural gas
22 distribution service to approximately 1,500,000 retail electric customers and
23 600,000 natural gas customers in North Dakota, Minnesota, and South Dakota.⁹
24 The operations that are subject to the Commission's jurisdiction provides

9 Xcel Energy, SEC Form 10-K at 9 (Dec. 31, 2021).

1 electric distribution service to approximately 1.3 million retail customers in
2 Minnesota.¹⁰ The Company has long-term issuer ratings of A2 from Moody's
3 Investor Services (Moody's) and A- from Standard & Poor's (S&P).¹¹ The
4 Company is not publicly-traded as it is an operating subsidiary of Xcel Energy
5 Inc. (XEI or the Parent). XEI is publicly-traded under ticker symbol XEL.

6
7 Page 1 of Exhibit___(DWD-1), Schedule 2 contains comparative capitalization
8 and financial statistics for the Company for the years 2016 to 2020.¹² During
9 the five-year period ending 2020, the historically achieved average earnings rate
10 on book common equity for the Company averaged 9.15%. The average
11 common equity ratio based on total capital (including short-term debt) was
12 52.36%, and the average dividend payout ratio was 86.42%.

13
14 Total debt to earnings before interest, taxes, depreciation, and amortization for
15 the years 2016 to 2020 ranges between 3.09 and 3.69 times, with an average of
16 3.38 times. Funds from operations to total debt range from 15.52% to 31.94%,
17 with an average of 22.67%.¹³

18
19 Q. PLEASE EXPLAIN HOW YOU CHOSE THE COMPANIES IN THE UTILITY PROXY
20 GROUP.

21 A. Because the Cost of Equity is a comparative exercise, my objective in
22 developing a proxy group was to select companies that are comparable to the

10 Company provided data.

11 Source: S&P Global Market Intelligence.

12 Source: Company audited financial statements per the as-filed Form 10-Ks.

13 Source: Company audited financial statements per the as filed Form 10-Ks.

- 1 Company. Because the Company is a 100% rate regulated vertically integrated
2 electric utility, I applied the following criteria to select my Utility Proxy Group:
- 3 (i) They were included in the Eastern, Central, or Western Electric Utility Group
4 of *Value Line Investment Survey* (Standard Edition)(*Value Line*);
 - 5 (ii) They have 70% or greater of fiscal year 2020 total operating income derived
6 from, and 70% or greater of fiscal year 2020 total assets attributable to, regulated
7 electric distribution operations;
 - 8 (iii) They are vertically integrated (i.e., utilities that own and operate regulated
9 generation, transmission, and distribution assets);
 - 10 (iv) At the time of preparation of this testimony, they had not publicly announced
11 that they were involved in any major merger or acquisition activity (i.e., one
12 publicly-traded utility merging with or acquiring another) or any other major
13 development;
 - 14 (v) They have not cut or omitted their common dividends during the five years
15 ending 2020 or through the time of preparation of this testimony;
 - 16 (vi) They have *Value Line* and Bloomberg Professional Services (Bloomberg)
17 adjusted Betas;
 - 18 (vii) They have positive *Value Line* five-year dividends per share (DPS) growth rate
19 projections; and
 - 20 (viii) They have *Value Line*, Zacks, or Yahoo! Finance consensus five-year earnings
21 per share (EPS) growth rate projections.

22 The following thirteen companies met these criteria:

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Table 2
Utility Proxy Group Companies

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

Q. PLEASE SUMMARIZE THE UTILITY PROXY GROUP'S HISTORICAL CAPITALIZATION AND FINANCIAL STATISTICS.

A. Page 1 of Exhibit___(DWD-1), Schedule 3 contains comparative capitalization and financial statistics for the Utility Proxy Group for the years 2016 to 2020.

During the five-year period ending 2020, the historically achieved average earnings rate on book common equity for the group averaged 8.81%, the average common equity ratio based on total capital (including short-term debt) was 46.38% , and the average dividend payout ratio was 59.81%.

1 Total debt to earnings before interest, taxes, depreciation, and amortization for
2 the years 2016 to 2020 ranges between 4.08 and 5.85 times, with an average of
3 4.96 times. Funds from operations to total debt range from 13.09% to 18.73%,
4 with an average of 16.63%. Given that those capitalization and financial
5 statistics are generally consistent with the Company's, I conclude the Utility
6 Proxy Group is comparable in risk to the Company.

7 8 **V. CAPITAL STRUCTURE**

9
10 Q. PLEASE SUMMARIZE THE COMPONENTS OF THE COMPANY'S RECOMMENDED
11 CAPITAL STRUCTURE AND WACC.

12 A. The Company's proposed 2022 test year capital structure includes long-term
13 debt, short-term debt, and common equity. The Company's proposed revenue
14 requirement for the test year reflects a WACC of 7.31%.¹⁴

15
16 Q. DOES THE COMPANY HAVE A SEPARATE CAPITAL STRUCTURE THAT IS
17 RECOGNIZED BY INVESTORS?

18 A. Yes. The Company is a separate corporate entity that has its own capital
19 structure and issues its own debt with the Securities and Exchange Commission.
20 That being said, the Minnesota jurisdictional operations' capital structure is an
21 allocated portion of the Company's capital structure.

14 See, Direct Testimony of Paul A. Johnson.

1 Q. WHY IS IT IMPORTANT THAT THE COMPANY’S RECOMMENDED CAPITAL
2 STRUCTURE BE AUTHORIZED IN THIS PROCEEDING?

3 A. As a preliminary matter, the Company’s recommended capital structure is
4 comparable to its historical capital structure, and is within a reasonable range
5 from the perspective of the Utility Proxy Group companies.¹⁵ The use of an
6 operating subsidiary’s capital structure is consistent with the FERC’s precedent,
7 under which they use the applicant’s capital structure, where possible.¹⁶ In
8 particular, the FERC will use the utility operating company’s capital structure if
9 it meets three criteria: (1) it issues its own debt without guarantees; (2) it has its
10 own bond rating; and (3) it has a capital structure within the range of capital
11 structures approved by the commission.¹⁷ The Company meets all of these
12 criteria.

13
14 Importantly, in order to provide safe, reliable, and affordable service to its
15 customers, the Company must meet the needs and serve the interests of its
16 various stakeholders, including customers, shareholders, and bondholders. The
17 interests of these stakeholder groups are aligned when the Company maintains
18 a healthy balance sheet, strong credit ratings, and a supportive regulatory
19 environment, ensuring it has access to capital on reasonable terms in order to
20 make necessary investments.

21
22 Safe and reliable service cannot be maintained at a reasonable cost if utilities do
23 not have the financial flexibility and strength to access competitive financing

15 Exhibit__(DWD-1), Schedule 3.

16 See, *Transcontinental Gas Pipe Line Corp*, 80 FERC ¶ 61,157, 61,657 (1997) (Opinion No. 414).

17 148 FERC ¶ 61,049 Docket No. EL14-12-000, at 190.

1 markets on reasonable terms. The authorization of a capital structure that
2 understates the Company's actual common equity will weaken the financial
3 condition of its operations and adversely impact the Company's ability to
4 address expenses and investment, to the detriment of customers and
5 shareholders. Safe and reliable service for customers cannot be sustained over
6 the long term if the interests of shareholders and bondholders are minimized
7 such that the public interest is not optimized.

8
9 Consequently, the Company's recommended capital structure should be used
10 to set rates in this proceeding.

11
12 Q. HOW DOES THE COMPANY'S REQUESTED TEST YEAR CAPITAL STRUCTURE
13 COMPARE WITH ITS RECENT CAPITAL STRUCTURES?

14 A. The requested test year capital structure is highly consistent with NSP's
15 historical capital structures. As shown on Exhibit__(DWD-1), Schedule 2, page
16 1, the common equity ratios for years 2016 through 2020 range from 52.08% to
17 52.67%, averaging 52.36%.

18
19 Q. HOW DOES NSP'S RECOMMENDED COMMON EQUITY RATIO OF 52.50%
20 COMPARE WITH THE COMMON EQUITY RATIOS MAINTAINED BY THE UTILITY
21 PROXY GROUP?

22 A. The Company's requested ratemaking common equity ratio of 52.50% is
23 reasonable and consistent with the range of common equity ratios maintained
24 by the Utility Proxy Group. In order to assess the reasonableness of the
25 Company's requested ratemaking common equity ratio, I reviewed the actual

1 common equity ratios maintained by the companies within the Utility Proxy
2 Group.¹⁸ As shown on pages 2 and 3 of Exhibit__(DWD-1), Schedule 3,
3 common equity ratios of the utilities range from 31.06% to 56.14% for fiscal
4 year 2020. The Company's recommended equity ratio of 52.50% falls within
5 this range and demonstrates both the reasonableness of using it to set rates and
6 the Company's relative financial health. Setting the WACC as requested by the
7 Company will continue to support the long-term financial health of the
8 Company for the benefit of all of its stakeholders, including Minnesota
9 customers.

10
11 I also considered *Value Line's* projected capital structures for the Utility Proxy
12 Group for 2024-2026. That analysis shows a range of projected common equity
13 ratios between 33.50% and 60.00%.¹⁹

14
15 In addition to comparing the Company's ratemaking common equity ratio with
16 common equity ratios currently and expected to be maintained by the Utility
17 Proxy Group (*i.e.*, at the holding company level), I also compared the
18 Company's ratemaking common equity ratio with the equity ratios maintained
19 by the operating subsidiaries of the Utility Proxy Group companies. As shown
20 on page 4 of Exhibit__(DWD-1), Schedule 3, common equity ratios of the
21 operating utility subsidiaries of the Utility Proxy Group range from 41.41% to
22 54.98% for fiscal year 2020.

18 The development of the Utility Proxy Group is described more fully in Section VI.

19 Exhibit__(DWD-1), Schedule 5, at 3-15.

1 Q. IS THE COMPANY'S PROPOSED EQUITY RATIO OF 52.50% APPROPRIATE FOR
2 RATEMAKING PURPOSES GIVEN THE RANGE OF THE UTILITY PROXY GROUP?

3 A. Yes, it is. The Company's proposed equity ratio of 52.50% is appropriate for
4 ratemaking purposes in the current proceeding because it aligns with its
5 historical capital structure and it is well within industry norms.

6

7

VI. COST OF LONG-TERM DEBT

8

9 Q. HOW IS THE COMPANY PROPOSING TO SET ITS COST OF LONG-TERM DEBT?

10 A. The Company is proposing to use its expected cost of long-term debt for the
11 test year.

12

13 Q. HOW WAS THE PROPOSED COST OF LONG-TERM DEBT DETERMINED?

14 A. As shown on Exhibit___(DWD-1), Schedule 4, page 1, the overall 4.13% cost
15 of long-term debt for the test year includes the actual and forecasted coupon
16 rate on all bonds expected to be outstanding for each month of the test year.²⁰

17 In addition to the interest expense, the cost of long-term debt also includes
18 actual amortization expense for debt issuance costs, discounts or premiums,
19 losses on reacquired debt, gains and losses from hedging transactions, and the
20 annual amortization of the upfront fees associated with the Company's multi-
21 year credit agreement.

20 The 4.13% cost of long-term debt includes forecasted interest rates for the 2022 planned issuances.

1 Q. HAVE YOU ANALYZED THE COMPANY'S COST OF LONG-TERM DEBT FOR
2 REASONABLENESS?

3 A. Yes, I have. To test the reasonableness of the Company's proposed long-term
4 debt cost, I reviewed the yield on equivalent debt at the time of issuance. As
5 shown in Exhibit____(DWD-1), Schedule 4, page 1, I compared the cost of each
6 individual issuance to the Bloomberg Fair Value Curves for A-rated and BBB-
7 rated utility debt at the time of the issuance. The expected cost of long-term
8 debt based on the Bloomberg Fair Value Curves for A-rated and BBB-rated
9 utility debt ranges from 4.20% to 4.58%, respectively, indicating that its 4.13%
10 proposed cost of long-term debt is reasonable.

11

12 **VII. COMMON EQUITY COST RATE MODELS**

13

14 Q. IS IT IMPORTANT THAT COST OF COMMON EQUITY MODELS BE MARKET-BASED?

15 A. Yes. As discussed previously, regulated public utilities, like the Company, must
16 compete for equity in capital markets along with all other companies with
17 commensurate risk, including non-utilities. The cost of common equity is thus
18 determined based on equity market expectations for the returns of those
19 companies. If an individual investor is choosing to invest their capital among
20 companies with comparable risk, they will choose the company providing a
21 higher return over a company providing a lower return.

22

23 Q. ARE THE COST OF COMMON EQUITY MODELS YOU USE MARKET-BASED MODELS?

24 A. Yes. The DCF model is market-based in that market prices are used in
25 developing the dividend yield component of the model. The RPM and CAPM

1 are also market-based in that the bond/issuer ratings and expected bond
2 yields/risk-free rate used in the application of the RPM and CAPM reflect the
3 market's assessment of bond/credit risk. In addition, the use of the Beta
4 coefficient to determine the equity risk premium also reflects the market's
5 assessment of market/systematic risk, as Beta coefficients are derived from
6 regression analyses of market prices. Moreover, market prices are used in the
7 development of the monthly returns and equity risk premiums used in the
8 Predictive Risk Premium Model (PRPM). Selection criteria for the Non-Price
9 Regulated Proxy Group are based on regression analyses of market prices and
10 reflect the market's assessment of total risk.

11
12 Q. WHAT ANALYTICAL APPROACHES DID YOU USE TO DETERMINE THE COMPANY'S
13 ROE?

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

18
19 I rely on multiple models because reasonable investors use a variety of tools and
20 do not rely exclusively on a single source of information or single model.
21 Moreover, the specific models on which I rely focus on different aspects of
22 return requirements, and provide different insights into investors' views of risk
23 and return. The DCF model, for example, estimates the investor-required
24 return assuming a constant expected dividend yield and growth rate in
25 perpetuity, while Risk Premium-based methods (*i.e.*, the RPM and CAPM

1 approaches) provide the ability to reflect investors' views of risk, future market
2 returns, and the relationship between interest rates and the Cost of Equity. Just
3 as the use of market data for the Utility Proxy Group adds the reliability
4 necessary to inform expert judgment in arriving at a recommended common
5 equity cost rate, the use of multiple generally accepted common equity cost rate
6 models also adds reliability and accuracy when arriving at a recommended
7 common equity cost rate.

8
9 **A. Discounted Cash Flow Model**

10 Q. PLEASE DESCRIBE THE DCF MODEL GENERALLY.

11 A. The theory underlying the DCF model is that the present value of an expected
12 future stream of net cash flows during the investment holding period can be
13 determined by discounting those cash flows at the cost of capital, or the
14 investors' capitalization rate. DCF theory indicates that an investor buys a stock
15 for an expected total return rate, which is derived from the cash flows received
16 from dividends and market price appreciation. Mathematically, the expected
17 dividend yield on market price plus a growth rate equals the capitalization rate;
18 *i.e.*, the total common equity return rate expected by investors, as shown in
19 Equation [1] below:

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

2 where:

3 K_e = the required Return on Equity;

4 D_0 = the annualized Dividend Per Share;

5 P = the current stock price; and

6 g = the growth rate.

7

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

9 A. I used the single-stage constant growth DCF model and the two growth DCF
10 model in my analyses.

11

12 Q. PLEASE DESCRIBE THE DIVIDEND YIELD YOU USED IN APPLYING THE CONSTANT
13 GROWTH DCF MODEL.

14 A. The unadjusted dividend yields are based on the proxy companies' dividends as
15 of August 31, 2021 divided by the average closing market price for the 60
16 trading days ended August 31, 2021.²¹

17

18 Q. PLEASE EXPLAIN YOUR ADJUSTMENT TO THE DIVIDEND YIELD.

19 A. Because dividends are paid periodically (*e.g.* quarterly), as opposed to
20 continuously (daily), an adjustment must be made to the dividend yield. This is
21 often referred to as the discrete, or the Gordon Periodic, version of the DCF
22 model.

21 ²¹ See, Column 1, page 1 of Exhibit___(DWD-1), Schedule 5.

1 DCF theory calls for using the full growth rate, or D_1 , in calculating the model's
2 dividend yield component. Since the companies in the Utility Proxy Group
3 increase their quarterly dividends at various times during the year, a conservative
4 assumption is to reflect one-half the annual dividend growth rate rather than
5 the full growth rate in the dividend yield component, or $D_{1/2}$. Because the
6 dividend should be representative of the next 12-month period, this adjustment
7 is a conservative approach that does not overstate the dividend yield. Therefore,
8 the actual average dividend yields in Column 1, page 1 of Exhibit____(DWD-1),
9 Schedule 5 have been adjusted upward to reflect one-half the average projected
10 growth rate shown in Column 5.

11
12 Q. PLEASE EXPLAIN THE BASIS FOR THE GROWTH RATES YOU APPLY IN YOUR
13 CONSTANT GROWTH DCF MODEL.

14 A. Investors with more limited resources than institutional investors are likely to
15 rely on widely available financial information services, such as *Value Line*, *Zacks*,
16 and *Yahoo! Finance*. Investors realize that analysts have significant insight into
17 the dynamics of the industries and individual companies they analyze, as well as
18 companies' abilities to effectively manage the effects of changing laws and
19 regulations, and ever-changing economic and market conditions. For these
20 reasons, I used analysts' five-year forecasts of EPS growth in my DCF analysis.

21
22 Over the long run, there can be no growth in DPS without growth in EPS.
23 Security analysts' earnings expectations have a more significant influence on
24 market prices than dividend expectations. Thus, using projected earnings
25 growth rates in a DCF analysis provides a better match between investors'

1 market price appreciation expectations and the growth rate component of the
2 DCF.

3
4 Q. PLEASE SUMMARIZE THE CONSTANT GROWTH DCF MODEL RESULTS.

5 A. As shown on page 1 of Exhibit____(DWD-1), Schedule 5, the application of the
6 Constant Growth DCF model to the Utility Proxy Group results in a wide range
7 of indicated ROEs from 6.39% to 11.73%. The mean of those results is 8.77%,
8 the median result is 8.89%, and the average of the mean and median results is
9 8.83%. In arriving at a conclusion of the indicated common equity cost rate for
10 the Utility Proxy Group implied by the Constant Growth DCF model, I relied
11 on an average of the mean and the median results (*i.e.*, 8.83%) of the DCF. By
12 doing so, I have considered the DCF results for each company without giving
13 undue weight to outliers on either the high or the low side.

14
15 Q. DID YOU CONSIDER ANY OTHER CONSTANT GROWTH DCF MODEL RESULTS?

16 A. No, I did not. However, consistent with the Department's past practice of
17 considering proxy groups which exclude companies whose DCF results do not
18 pass the test of reasonableness,²² I calculated the average and median result of
19 the constant growth DCF model excluding proxy companies with results below
20 7.00%, which is 9.05%.²³ Because I did not include the DCF results excluding
21 proxy company results below 7.00% in my calculation of the indicated common

22 See, for example, Docket No. E017/GR-15-1033, In the Matter of the Application of Otter Tail
Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota,
August 16, 2016, at 11.

23 See, Column 7, page 1 of Exhibit____(DWD-1), Schedule 5.

1 equity cost rate for the Utility Proxy Group, the 8.83% indicated DCF model
2 results noted above represents a conservative measure of the Company's ROE.

3
4 Q. PLEASE DESCRIBE YOUR USE OF THE TWO GROWTH DCF APPROACH IN YOUR
5 ANALYSES.

6 A. I also considered the results of the two growth DCF approach, which moderates
7 the effects of substantially high or low growth rate estimates that may be
8 influenced by near-term events and may not reflect the subject company's
9 expected long-term growth rate. The two growth DCF approach therefore may
10 be applied when the mean growth rate of a particular company is considered
11 unusually high or low relative to the proxy group. Whereas the constant growth
12 DCF method assumes a single, constant growth rate in perpetuity, the two
13 growth DCF approach allows for a near-term growth estimate (the first stage)
14 followed by a long-term "terminal" period growth estimate. This approach is
15 consistent with the method adopted by the Commission in several prior
16 proceedings. In this case, I applied the two growth DCF approach to two Utility
17 Proxy Group companies with mean growth rates greater than one standard
18 deviation from the overall Utility Proxy Group mean growth rate.

19
20 Q. PLEASE EXPLAIN THE BASIS OF THE GROWTH RATES YOU APPLY IN YOUR TWO
21 GROWTH DCF MODEL.

22 A. If the proxy group company's growth rate fell within the one standard deviation
23 of the mean growth rate of the Utility Proxy Group, that company would have
24 the same growth rate and same indicated ROE in both the constant growth and
25 two growth DCF models. If the company's growth rate fell outside of one

1 standard deviation of the Utility Proxy Group mean growth rate, I applied those
2 growth rates only to the first five years of the two growth DCF analysis. For
3 the second stage (that is, the terminal period of the two growth DCF analysis),
4 I used the mean growth rate of all Utility Proxy Group companies with growth
5 rates within one standard deviation of the overall mean growth rate.

6
7 Q. PLEASE SUMMARIZE THE TWO GROWTH DCF MODEL RESULTS.

8 A. As shown on page 2 of Exhibit____(DWD-1), Schedule 5, for the Utility Proxy
9 Group, the mean result of applying the two growth DCF model is 8.66%, the
10 median result is 8.77%, and the average of the two is 8.72%. In arriving at a
11 conclusion for the two growth DCF-indicated common equity cost rate for the
12 Utility Proxy Group, I relied on an average of the mean and the median results
13 of the DCF.

14
15 **B. The Risk Premium Model**

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

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

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

10
11 Q. PLEASE EXPLAIN HOW YOU DERIVED YOUR INDICATED COST OF COMMON
12 EQUITY BASED ON THE RPM.

13 A. To derive my indicated cost of common equity under the RPM, I used two risk
14 premium methods. The first method was the PRPM and the second method
15 was a risk premium model using a total market approach. The PRPM estimates
16 the risk-return relationship directly, while the total market approach indirectly
17 derives a risk premium by using known metrics as a proxy for risk.

18
19 *1. Predictive Risk Premium Model*

20 Q. PLEASE EXPLAIN THE PRPM.

21 A. The PRPM, published in the *Journal of Regulatory Economics*,²⁴ was developed from
22 the work of Robert F. Engle, who shared the Nobel Prize in Economics in 2003
23 “for methods of analyzing economic time series with time-varying volatility” or

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

1 ARCH.²⁵ Engle found that volatility changes over time and is related from one
2 period to the next, especially in financial markets. Engle discovered that
3 volatility of prices and returns clusters over time and is therefore highly
4 predictable and can be used to predict future levels of risk and risk premiums.
5 That is, historical volatility can be used to predict future volatility, which then
6 can be translated to a predicted equity risk premium.

7
8 The PRPM estimates the risk-return relationship directly, as the predicted equity
9 risk premium is generated by predicting volatility or risk. The PRPM is not
10 based on an estimate of investor behavior, but rather on an evaluation of the
11 results of that behavior (*i.e.*, the variance of historical equity risk premiums).

12
13 The inputs to the model are the historical returns on the common shares of
14 each Utility Proxy Group company minus the historical monthly yield on long-
15 term U.S. Treasury securities through August 2021. Using a generalized form
16 of ARCH, known as GARCH, I calculated each Utility Proxy Group company's
17 projected equity risk premium using Eviews[®] statistical software. When the
18 GARCH model is applied to the historical return data, it produces a predicted
19 GARCH variance series²⁶ and a GARCH coefficient.²⁷ Multiplying the
20 predicted monthly variance by the GARCH coefficient and then annualizing it²⁸
21 produces the predicted annual equity risk premium. I then added the forecasted
22 30-year U.S. Treasury bond yield of 2.70%²⁹ to each company's PRPM-derived

25 Autoregressive conditional heteroscedasticity; *See also*, www.nobelprize.org.
26 Illustrated on Columns 1 and 2, page 2 of Exhibit____(DWD-1), Schedule 6.
27 Illustrated on Column 4, page 2 of Exhibit____(DWD-1), Schedule 6.
28 Annualized Return = (1 + Monthly Return) ^12 - 1
29 *See*, Column 6, page 2 of Exhibit____(DWD-1), Schedule 6.

1 equity risk premium to arrive at an indicated cost of common equity. The 30-
2 year U.S. Treasury bond yield is a consensus forecast derived from *Blue Chip*
3 *Financial Services (Blue Chip)*.³⁰ The mean PRPM indicated common equity cost
4 rate for the Utility Proxy Group is 11.34%, the median is 10.98%, and the
5 average of the two is 11.16%. Consistent with my reliance on the average of
6 the median and mean results of the DCF models, I relied on the average of the
7 mean and median results of the Utility Proxy Group PRPM to calculate a cost
8 of common equity rate of 11.16%.

9
10 Q. PLEASE DESCRIBE YOUR SELECTION OF A RISK-FREE RATE OF RETURN.

11 A. As shown in Exhibit___(DWD-1), Schedules 6 and 7, the risk-free rate adopted
12 for applications of the RPM and CAPM is 2.70%. This risk-free rate is based
13 on the average of the *Blue Chip* consensus forecast of the expected yields on 30-
14 year U.S. Treasury bonds for the six quarters ending with the fourth calendar
15 quarter of 2022, and long-term projections for the years 2023 to 2027 and 2028
16 to 2032.

17
18 Q. WHY DO YOU USE THE PROJECTED 30-YEAR TREASURY YIELD IN YOUR
19 ANALYSES?

20 A. The yield on long-term U.S. Treasury bonds is almost risk-free and its term is
21 consistent with the long-term cost of capital to public utilities measured by the
22 yields on Moody's A-rated public utility bonds; the long-term investment
23 horizon inherent in utilities' common stocks; and the long-term life of the
24 jurisdictional rate base to which the allowed fair rate of return (*i.e.*, cost of

30 *Blue Chip Financial Forecasts (Blue Chip)*, June 1, 2021 at 14, and September 1, 2021 at 2.

1 capital) will be applied. In contrast, short-term U.S. Treasury yields are more
2 volatile and largely a function of Federal Reserve monetary policy.

3
4 More specifically, the term of the risk-free rate used for cost of capital purposes
5 should match the life (or duration) of the underlying investment (*i.e.*, perpetuity).
6 As noted by Morningstar:

7
8 The traditional thinking regarding the time horizon of the chosen
9 Treasury security is that it should match the time horizon of whatever is
10 being valued. When valuing a business that is being treated as a going
11 concern, the appropriate Treasury yield should be that of a long-term
12 Treasury bond. Note that the horizon is a function of the investment,
13 not the investor. If an investor plans to hold stock in a company for
14 only five years, the yield on a five-year Treasury note would not be
15 appropriate since the company will continue to exist beyond those five
16 years.³¹

17
18 Morin also confirms this when he states:

19
20 [b]ecause common stock is a long-term investment and
21 because the cash flows to investors in the form of dividends
22 last indefinitely, the yield on very long-term government
23 bonds, namely, the yield on 30-year Treasury bonds, is the best
24 measure of the risk-free rate for use in the CAPM (footnote

31 Morningstar, Inc., 2013 Ibbotson Stocks, Bonds, Bills and Inflation Valuation Yearbook, at 44.

1 omitted)... The expected common stock return is based on
2 long-term cash flows, regardless of an individual's holding time
3 period.³²

4 Pratt and Grabowski recommend a similar approach to selecting the risk-free
5 rate: “[i]n theory, when determining the risk-free rate and the matching ERP
6 you should be matching the risk-free security and the ERP with the period in
7 which the investment cash flows are expected.”³³

8
9 As a practical matter, equity securities represent a perpetual claim on cash flows;
10 30-year Treasury bonds are the longest-maturity securities available to
11 approximate that perpetual claim. Thus, the use of a 30-year Treasury bond
12 yield is a more appropriate risk-free rate as it more accurately reflects the life of
13 the assets it finances.

14 15 2. *Total Market Approach Risk Premium Model*

16 Q. PLEASE EXPLAIN THE TOTAL MARKET APPROACH RPM.

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

32 Roger A. Morin, New Regulatory Finance, 2006, at 151. (Morin)

33 Shannon Pratt and Roger Grabowski, Cost of Capital: Applications and Examples, 3rd Ed. (Hoboken, NJ: John Wiley & Sons, Inc., 2008), at 92. “ERP” is the Equity Risk Premium.

1 Q. PLEASE EXPLAIN HOW YOU DETERMINED THE EXPECTED BOND YIELD,
2 APPLICABLE TO THE UTILITY PROXY GROUP.

3 A. The first step in the total market approach RPM analysis is to determine the
4 expected bond yield. Because both ratemaking and the cost of capital, including
5 the common equity cost rate, are prospective in nature, a prospective yield on
6 similarly-rated long-term debt is essential. Because I am unaware of any
7 publication that provides forecasted public utility bond yields, I relied on a
8 consensus forecast of about 50 economists of the expected yield on Aaa-rated
9 corporate bonds for the six calendar quarters ending with the fourth calendar
10 quarter of 2022, and *Blue Chip's* long-term projections for 2023 to 2027, and
11 2028 to 2032. As shown on line 1, page 3 of Exhibit____(DWD-1), Schedule 6,
12 the average expected yield on Moody's Aaa-rated corporate bonds is 3.41%.

13
14 Because that 3.41% estimate represents a corporate bond yield and not a utility
15 specific bond yield, I adjusted the expected Aaa-rated corporate bond yield to
16 an equivalent A2-rated public utility bond yield. That resulted in an upward
17 adjustment of 0.38%, which represents a recent spread between Aaa-rated
18 corporate bonds and A2-rated public utility bonds.³⁴ Adding that recent 0.38%
19 spread to the expected Aaa-rated corporate bond yield of 3.41% results in an
20 expected A2-rated public utility bond yield of 3.79%.

21
22 I then reviewed the average credit rating for the Utility Proxy Group from
23 Moody's to determine if an adjustment to the estimated A2-rated public utility
24 bond was necessary. Since the Utility Proxy Group's average Moody's long-

34 As shown on line 2 and explained in note 2, page 3 of Exhibit____(DWD-1), Schedule 6.

1 term issuer rating is A3/Baa1, another adjustment to the expected A2-rated
 2 public utility bond is needed to reflect the difference in bond ratings. An
 3 upward adjustment of 0.13%, which represents one-half of a recent spread
 4 between A2-rated and Baa2-rated public utility bond yields, is necessary to make
 5 the A2 prospective bond yield applicable to an A2/A3-rated public utility
 6 bond.³⁵ Adding the 0.13% to the 3.79% prospective A2-rated public utility
 7 bond yield results in a 3.92% expected bond yield applicable to the Utility Proxy
 8 Group.

9
 10 **Table 3**
 11 **Summary of the Calculation of the Utility Proxy Group**
 12 **Projected Bond Yield³⁶**

14	Prospective Yield on Moody's Aaa-Rated Corporate Bonds (<i>Blue Chip</i>)	3.41%
15	Adjustment to Reflect Yield Spread Between Moody's Aaa-Rated Corporate Bonds and Moody's A2-Rated Utility Bonds	0.38%
16	Adjustment to Reflect the Utility Proxy Group's Average Moody's Bond Rating of A3/Baa1	<u>0.13%</u>
17	Prospective Bond Yield Applicable to the Utility Proxy Group	<u>3.92%</u>

18
 19
 20

35 As shown on line 4 and explained in note 3, page 3 of Exhibit___(DWD-1), Schedule 6. Moody's does not provide public utility bond yields for Baa1 or A3-rated bonds. As such, it was necessary to estimate the difference between A2-rated and A3/Baa1-rated public utility bonds. Because there are three steps between Baa2 and A2 (Baa2 to Baa1, Baa1 to A3, and A3 to A2) I assumed an adjustment of one-half of the difference between the A2-rated and Baa2-rated public utility bond yield was appropriate.

36 As shown on page 3 of Exhibit___(DWD-1), Schedule 6.

1 To develop the total market approach RPM estimate of the appropriate return
2 on equity, this prospective bond yield is then added to the average of the three
3 different equity risk premiums, which I now discuss, in turn.

4
5 **a. Beta Coefficient Derived Equity Risk Premium**

6 Q. PLEASE EXPLAIN HOW THE BETA-DERIVED EQUITY RISK PREMIUM IS
7 DETERMINED.

8 A. The components of the Beta-derived risk premium model are: 1) an expected
9 market equity risk premium over corporate bonds, and 2) the Beta coefficient.
10 The derivation of the Beta-derived equity risk premium that I applied to the
11 Utility Proxy Group is shown on lines 1 through 9, page 8 of Exhibit___(DWD-
12 1), Schedule 6. The total Beta-derived equity risk premium I applied is based
13 on an average of three historical market data-based equity risk premiums, two
14 *Value Line*-based equity risk premiums and a Bloomberg-based equity risk
15 premium. Each of these is described below.

16
17 Q. HOW DID YOU DERIVE A MARKET EQUITY RISK PREMIUM BASED ON LONG-TERM
18 HISTORICAL DATA?

19 A. To derive a historical market equity risk premium, I used the most recent
20 holding period returns for the large company common stocks from the Stocks,
21 Bonds, Bills, and Inflation (SBBI) Yearbook 2021 (SBBI - 2021)³⁷ less the
22 average historical yield on Moody's Aaa/Aa-rated corporate bonds for the
23 period 1928 to 2020. Using holding period returns over a very long time is
24 appropriate because it is consistent with the long-term investment horizon

37 See, SBBI-2021 Appendix A Tables: Morningstar Stocks, Bonds, Bills, & Inflation 1926-2020.

1 presumed by investing in a going concern, *i.e.*, a company expected to operate
2 in perpetuity.

3
4 SBBI's long-term arithmetic mean monthly total return rate on large company
5 common stocks was 11.94% and the long-term arithmetic mean monthly yield
6 on Moody's Aaa/Aa-rated corporate bonds was 6.02%.³⁸ As shown on line 1,
7 page 8 of Exhibit____(DWD-1), Schedule 6, subtracting the mean monthly bond
8 yield from the total return on large company stocks results in a long-term
9 historical equity risk premium of 5.92%.

10
11 I used the arithmetic mean monthly total return rates for the large company
12 stocks and yields (income returns) for the Moody's Aaa/Aa corporate bonds,
13 because they are appropriate for the purpose of estimating the cost of capital as
14 noted in SBBI-2021.³⁹ Using the arithmetic mean return rates and yields is
15 appropriate because historical total returns and equity risk premiums provide
16 insight into the variance and standard deviation of returns needed by investors
17 in estimating future risk when making a current investment. If investors relied
18 on the geometric mean of historical equity risk premiums, they would have no
19 insight into the potential variance of future returns, because the geometric mean
20 relates the change over many periods to a constant rate of change, thereby
21 obviating the year-to-year fluctuations, or variance, which is critical to risk
22 analysis.

38 As explained in note 1, page 9 of Exhibit____(DWD-1), Schedule 6.

39 *See*, SBBI-2021, at page 10-22, 10-23.

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

3 A. To derive the regression-based market equity risk premium of 8.87% shown on
4 line 2, page 8 of Exhibit___(DWD-1), Schedule 6, I used the same monthly
5 annualized total returns on large company common stocks relative to the
6 monthly annualized yields on Moody's Aaa/Aa-rated corporate bonds as
7 mentioned above. I modeled the relationship between interest rates and the
8 market equity risk premium using the observed monthly market equity risk
9 premium as the dependent variable, and the monthly yield on Moody's Aaa/Aa-
10 rated corporate bonds as the independent variable. I then used a linear Ordinary
11 Least Squares (OLS) regression, in which the market equity risk premium is
12 expressed as a function of the Moody's Aaa/Aa-rated corporate bond yield:

13

$$14 \quad RP = \alpha + \beta (R_{Aaa/Aa})$$

15

16 Q. PLEASE EXPLAIN THE DERIVATION OF THE PRPM EQUITY RISK PREMIUM.

17 A. I used the same PRPM approach described above to the PRPM equity risk
18 premium. The inputs to the model are the historical monthly returns on large
19 company common stocks minus the monthly yields on Moody's Aaa/Aa-rated
20 corporate bonds during the period from January 1928 through August 2021.⁴⁰
21 Using the previously discussed generalized form of ARCH, known as GARCH,
22 the projected equity risk premium is determined using Eviews[®] statistical

40 Data from January 1926 to December 2020 is from SBBI - 2021. Data from January 2021 to August 2021 is from Bloomberg.

1 software. The resulting PRPM predicted a market equity risk premium of
2 7.88%.⁴¹

3
4 Q. PLEASE EXPLAIN THE DERIVATION OF A PROJECTED EQUITY RISK PREMIUM
5 BASED ON *VALUE LINE* DATA FOR YOUR RPM ANALYSIS.

6 A. As noted above, because both ratemaking and the cost of capital are
7 prospective, a prospective market equity risk premium is needed. The
8 derivation of the forecasted or prospective market equity risk premium can be
9 found in note 4, page 9 of Exhibit___(DWD-1), Schedule 6. Consistent with
10 my calculation of the dividend yield component in my DCF analysis, this
11 prospective market equity risk premium is derived from an average of the three-
12 to five-year median market price appreciation potential by *Value Line* for the 13
13 weeks ended September 3, 2021, plus an average of the median estimated
14 dividend yield for the common stocks of the 1,700 firms covered in *Value Line*
15 (Standard Edition).⁴²

16
17 The average median expected price appreciation is 32%, which translates to a
18 7.19% annual appreciation, and, when added to the average of *Value Line's*
19 median expected dividend yields of 1.75%, equates to a forecasted annual total
20 return rate on the market of 8.94%. The forecasted Moody's Aaa-rated
21 corporate bond yield of 3.41% is deducted from the total market return of
22 8.94%, resulting in an equity risk premium of 5.53%, as shown on line 4, page
23 8 of Exhibit___(DWD-1), Schedule 6.

41 Shown on line 3, page 8 of Exhibit___(DWD-1), Schedule 6.

42 As explained in detail in note 1, page 2 of Exhibit___(DWD-1), Schedule 7.

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

3 A. Using data from *Value Line*, I calculated an expected total return on the S&P
4 500 companies using expected dividend yields and long-term growth estimates
5 as a proxy for capital appreciation. The expected total return for the S&P 500
6 is 15.05%. Subtracting the prospective yield on Moody's Aaa-rated corporate
7 bonds of 3.41% results in a 11.64% projected equity risk premium.

8

9 Q. PLEASE EXPLAIN THE DERIVATION OF AN EQUITY RISK PREMIUM BASED ON
10 BLOOMBERG DATA.

11 A. Using data from Bloomberg, I calculated an expected total return on the S&P
12 500 using expected dividend yields and long-term growth estimates as a proxy
13 for capital appreciation, identical to the method described above. The expected
14 total return for the S&P 500 is 18.17%. Subtracting the prospective yield on
15 Moody's Aaa-rated corporate bonds of 3.41% results in a 14.76% projected
16 equity risk premium.

17

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

20 A. I gave equal weight to all six equity risk premiums based on each source -
21 historical, *Value Line*, and Bloomberg - in arriving at an 9.10% equity risk
22 premium.

Table 4
Summary of the Calculation of the Equity Risk Premium
Using Total Market Returns⁴³

Historical Spread Between Total Returns of Large Stocks and Aaa and Aa-Rated Corporate Bond Yields (1928 – 2020)	5.92%
Regression Analysis on Historical Data	8.87%
PRPM Analysis on Historical Data	7.88%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected Aaa Corporate Bond Yields	5.53%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P 500 less Projected Aaa Corporate Bond Yields	11.64%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected Aaa Corporate Bond Yields	<u>14.76%</u>
Average	<u>9.10%</u>

After calculating the average market equity risk premium of 9.10%, I adjusted it by the Beta coefficient to account for the risk of the Utility Proxy Group. As discussed below, the Beta coefficient is a meaningful measure of prospective relative risk to the market as a whole, and is a logical way to allocate a company's, or proxy group's, share of the market's total equity risk premium relative to corporate bond yields. As shown on page 1 of Exhibit___(DWD-1), Schedule

⁴³ As shown on page 8 of Exhibit___(DWD-1), Schedule 6.

1 6, the average of the mean and median Beta coefficient for the Utility Proxy
2 Group is 0.99. Multiplying the 0.99 average Beta coefficient by the market
3 equity risk premium of 9.10% results in a Beta-adjusted equity risk premium for
4 the Utility Proxy Group of 9.01%.

5
6 **b. S&P Utility Index Derived Equity Risk Premium**

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

9 A. I estimated three equity risk premiums based on S&P Utility Index holding
10 period returns, and two equity risk premiums based on the expected returns of
11 the S&P Utilities Index, using *Value Line* and Bloomberg data, respectively.
12 Turning first to the S&P Utility Index holding period returns, I derived a long-
13 term monthly arithmetic mean equity risk premium between the S&P Utility
14 Index total returns of 10.65% and monthly Moody's A-rated public utility bond
15 yields of 6.49% from 1928 to 2020 to arrive at an equity risk premium of
16 4.16%.⁴⁴ I then used the same historical data to derive an equity risk premium
17 of 6.51% based on a regression of the monthly equity risk premiums. The final
18 S&P Utility Index holding period equity risk premium involved applying the
19 PRPM using the historical monthly equity risk premiums from January 1928 to
20 August 2021 to arrive at a PRPM-derived equity risk premium of 4.94% for the
21 S&P Utility Index.

22
23 I then derived expected total returns on the S&P Utilities Index of 10.94% and
24 9.11% using data from *Value Line* and Bloomberg, respectively, and subtracted

44 As shown on line 1, page 12 of Exhibit____(DWD-1), Schedule 6.

1 the prospective Moody's A2-rated public utility bond yield of 3.79%⁴⁵, which
 2 resulted in equity risk premiums of 7.15% and 5.32%, respectively. As with the
 3 market equity risk premiums, I averaged each risk premium based on each
 4 source (*i.e.*, historical, *Value Line*, and Bloomberg) to arrive at my utility-specific
 5 equity risk premium of 5.62%.

6
 7 **Table 5**
 8 **Summary of the Calculation of the Equity Risk Premium**
 9 **Using S&P Utility Index Holding Returns⁴⁶**

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

45 Derived on line 3, page 3 of Exhibit____(DWD-1), Schedule 6.

46 As shown on page 12 of Exhibit____(DWD-1), Schedule 6.

1 **c. Authorized Return Derived Equity Risk Premium**

2 Q. HOW DO YOU DERIVE AN EQUITY RISK PREMIUM OF 5.64% BASED ON
3 AUTHORIZED ROES FOR ELECTRIC UTILITIES?

4 A. The equity risk premium of 5.81% shown on line 3, page 7 of
5 Exhibit____(DWD-1), Schedule 6 is the result of a regression analysis based on
6 regulatory awarded ROEs related to the yields on Moody's A-rated public utility
7 bonds. That analysis is shown on page 13 of Exhibit____(DWD-1), Schedule 6.
8 Page 13 of Exhibit____(DWD-1), Schedule 6 contains the graphical results of a
9 regression analysis of 1,183 rate cases for electric utilities which were fully
10 litigated during the period from January 1, 1980 through August 31, 2021. It
11 shows the implicit equity risk premium relative to the yields on A2-rated public
12 utility bonds immediately prior to the issuance of each regulatory decision. That
13 is, the analysis considers the relationship between authorized returns and
14 prevailing public utility bond yields at the time of the decision.

15
16 It is readily discernible that there is an inverse relationship between the yield on
17 A2-rated public utility bonds and equity risk premiums. In other words, as
18 interest rates decline, the equity risk premium rises and vice versa, a result
19 consistent with financial literature on the subject.⁴⁷ I used the regression results
20 to estimate the equity risk premium applicable to the projected yield on Moody's
21 A2-rated public utility bonds. Given the expected A2-rated utility bond yield
22 of 3.79%, it can be calculated that the indicated equity risk premium applicable

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

1 to that bond yield is 5.81%, which is shown on line 3, page 7 of
2 Exhibit____(DWD-1), Schedule 6.

3
4 Q. WHAT IS YOUR CONCLUSION OF AN EQUITY RISK PREMIUM FOR USE IN YOUR
5 TOTAL MARKET APPROACH RPM ANALYSIS?

6 A. The equity risk premium I apply to the Utility Proxy Group is 6.81%, which is
7 the average of the Beta-adjusted equity risk premium for the Utility Proxy
8 Group, the S&P Utilities Index, and the authorized return utility equity risk
9 premiums of 9.01%, 5.62%, and 5.81%, respectively.⁴⁸

10
11 Q. WHAT IS THE INDICATED RPM COMMON EQUITY COST RATE BASED ON THE
12 TOTAL MARKET APPROACH?

13 A. As shown on line 7, page 3 of Exhibit____(DWD-1), Schedule 6 and shown on
14 Table 6, below, I calculated a common equity cost rate of 10.73% for the Utility
15 Proxy Group based on the total market approach RPM.

16
17 **Table 6**
18 **Summary of the Total Market Return Risk Premium Model⁴⁹**

19

Prospective Moody's A3-Rated Utility Bond Applicable to the Utility Proxy Group	3.92%
Prospective Equity Risk Premium	<u>6.81%</u>
Indicated Cost of Common Equity	<u>10.73%</u>

20
21
22

48 As shown on page 7 of Exhibit____(DWD-1), Schedule 6.

49 As shown on page 3 of Exhibit____(DWD-1), Schedule 6.

1 Q. WHAT ARE THE RESULTS OF YOUR APPLICATION OF THE PRPM AND THE TOTAL
2 MARKET APPROACH RPM?

3 A. As shown on page 1 of Exhibit___(DWD-1), Schedule 6, the indicated RPM-
4 derived common equity cost rate is 10.95%, which gives equal weight to the
5 PRPM (11.16%) and the adjusted-market approach results (10.73%).

6

7 **C. The Capital Asset Pricing Model**

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

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

13

14 The CAPM assumes that all non-market or unsystematic risk can be eliminated
15 through diversification. The risk that cannot be eliminated through
16 diversification is called market, or systematic, risk. In addition, the CAPM
17 presumes that investors only require compensation for systematic risk, which is
18 the result of macroeconomic and other events that affect the returns on all
19 assets. The model is applied by adding a risk-free rate of return to a market risk
20 premium, which is adjusted proportionately to reflect the systematic risk of the
21 individual security relative to the total market as measured by the Beta
22 coefficient. The traditional CAPM model is expressed as:

1 $R_s = R_f + \beta (R_m - R_f)$

2 Where: R_s = Return rate on the common stock

3 R_f = Risk-free rate of return

4 R_m = Return rate on the market as a whole

5 β = Adjusted Beta coefficient (volatility of the
6 security relative to the market as a whole)

7

8 Numerous tests of the traditional CAPM have measured the extent to which
9 security returns and Beta coefficients are related as predicted by the CAPM,
10 confirming its validity. The empirical CAPM (ECAPM) reflects the reality that
11 while the results of these tests support the notion that the Beta coefficient is
12 related to security returns, the empirical Security Market Line (SML) described
13 by the CAPM formula is not as steeply sloped as the predicted SML.⁵⁰

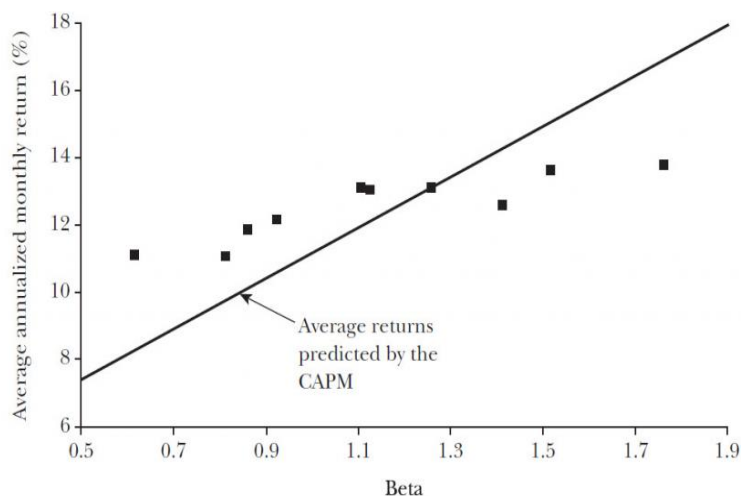
14

15 In their work on the CAPM, Fama and French clearly state regarding
16 Figure 2, below, that “[t]he returns on the low beta portfolios are too high,
17 and the returns on the high beta portfolios are too low.”⁵¹

50 Morin, at 175.

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

1 *Figure 2* <http://pubs.aeaweb.org/doi/pdfplus/10.1257/0895330042162430>
 2 **Average Annualized Monthly Return versus Beta for Value Weight Portfolios**
 3 **Formed on Prior Beta, 1928–2003**



4
5
6
7
8
9
10
11
12 In addition, Morin observes that while the results of these tests support the
13 notion that Beta is related to security returns, the empirical SML described by
14 the CAPM formula is not as steeply sloped as the predicted SML. Morin
15 states:

16
17 With few exceptions, the empirical studies agree that ... low-beta
18 securities earn returns somewhat higher than the CAPM would predict,
19 and high-beta securities earn less than predicted.⁵²

20
21 * * *

52 Morin, at 175.

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

$$3 \quad K = R_F + x (R_M - R_F) + (1-x) \beta(R_M - R_F)$$

4
5
6 where x is a fraction to be determined empirically. The value of x that
7 best explains the observed relationship [is] $\text{Return} = 0.0829 + 0.0520 \beta$
8 is between 0.25 and 0.30. If $x = 0.25$, the equation becomes:

$$9 \quad K = R_F + 0.25(R_M - R_F) + 0.75 \beta(R_M - R_F)^{53}$$

10
11
12 Fama and French provide similar support for the ECAPM when they state:

13
14 The early tests firmly reject the Sharpe-Lintner version of the CAPM.
15 There is a positive relation between beta and average return, but it is
16 too 'flat.'... The regressions consistently find that the intercept is
17 greater than the average risk-free rate... and the coefficient on beta is
18 less than the average excess market return... This is true in the early
19 tests... as well as in more recent cross-section regressions tests, like
20 Fama and French (1992).⁵⁴

21
22 Finally, Fama and French further note:

53 *Ibid.*, at 190.

54 Fama & French, at 32.

1 Confirming earlier evidence, the relation between beta and average
2 return for the ten portfolios is much flatter than the Sharpe-Linter
3 CAPM predicts. The returns on low beta portfolios are too high, and
4 the returns on the high beta portfolios are too low. For example, the
5 predicted return on the portfolio with the lowest beta is 8.3 percent per
6 year; the actual return as 11.1 percent. The predicted return on the
7 portfolio with the t beta is 16.8 percent per year; the actual is 13.7
8 percent.⁵⁵

9
10 Clearly, the justification from Morin, Fama, and French, along with their
11 reviews of other academic research on the CAPM, validate the use of the
12 ECAPM. In view of theory and practical research, I have applied both the
13 traditional CAPM and the ECAPM to the companies in the Utility Proxy Group
14 and averaged the results.

15
16 Q. WHAT BETA COEFFICIENTS DID YOU USE IN YOUR CAPM ANALYSIS?

17 A. For the Beta coefficients in my CAPM analysis, I considered two sources: *Value*
18 *Line* and Bloomberg Professional Services. While both of those services adjust
19 their calculated (or “raw”) Beta coefficients to reflect the tendency of the Beta
20 coefficient to regress to the market mean of 1.00, *Value Line* calculates the Beta
21 coefficient over a five-year period, while Bloomberg calculates it over a two-
22 year period.

55 *Ibid.*, at 33.

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

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

7

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

10 A. The basis of the market risk premium is explained in detail in note 1 on
11 Exhibit____(DWD-1), Schedule 7. As discussed above, the market risk premium
12 is derived from an average of three historical data-based market risk premiums,
13 two *Value Line* data-based market risk premiums, and one Bloomberg data-
14 based market risk premium.

15

16 The long-term income return on U.S. Government securities of 5.05% was
17 deducted from the SBBI – 2021 monthly historical total market return of
18 12.20%, which results in an historical market equity risk premium of 7.15%.⁵⁶ I
19 applied a linear OLS regression to the monthly annualized historical returns on
20 the S&P 500 relative to historical yields on long-term U.S. Government
21 securities from SBBI - 2021. That regression analysis yielded a market equity
22 risk premium of 9.57%. The PRPM market equity risk premium is 8.77%, and
23 is derived using the PRPM relative to the yields on long-term U.S. Treasury
24 securities from January 1926 through August 2021.

56 SBBI - 2020, at Appendix A-1 (1) through A-1 (3) and Appendix A-7 (19) through A-7 (21).

1 The *Value Line*-derived forecasted total market equity risk premium is derived
2 by deducting the forecasted risk-free rate of 2.70%, discussed above, from the
3 *Value Line* projected total annual market return of 8.94%, resulting in a
4 forecasted total market equity risk premium of 6.24%. The S&P 500 projected
5 market equity risk premium using *Value Line* data is derived by subtracting the
6 projected risk-free rate of 2.70% from the projected total return of the S&P 500
7 of 15.05%. The resulting market equity risk premium is 12.35%.

8
9 The S&P 500 projected market equity risk premium using Bloomberg data is
10 derived by subtracting the projected risk-free rate of 2.70% from the projected
11 total return of the S&P 500 of 18.17%. The resulting market equity risk
12 premium is 15.47%. These six measures, when averaged, result in an average
13 total market equity risk premium of 9.93%.

Table 7
Summary of the Calculation of the
Market Risk Premium for Use in the CAPM⁵⁷

Historical Spread Between Total Returns of Large Stocks and Long-Term Government Bond Yields (1926 – 2019)	7.15%
Regression Analysis on Historical Data	9.57%
PRPM Analysis on Historical Data	8.77%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected 30-Year Treasury Bond Yields	6.24%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P 500 less Projected 30-Year Treasury Bond Yields	12.35%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected 30-Year Treasury Bond Yields	<u>15.47%</u>
Average	<u>9.93%</u>

Q. WHAT ARE THE RESULTS OF YOUR APPLICATION OF THE TRADITIONAL AND EMPIRICAL CAPM TO THE UTILITY PROXY GROUP?

A. As shown on page 1 of Exhibit___(DWD-1), Schedule 7, the mean result of my CAPM/ECAPM analyses is 12.60%, the median is 12.45%, and the average of the two is 12.53%. Consistent with my reliance on the average of mean and median DCF results discussed above, the indicated common equity cost rate using the CAPM/ECAPM is 12.53%.

⁵⁷ As shown on page 2 of Exhibit___(DWD-1), Schedule 7.

1 **D. Common Equity Cost Rates for a Proxy Group of Domestic, Non-**
2 **Price Regulated Companies Based on the DCF, RPM, and CAPM**

3 Q. WHY DO YOU ALSO CONSIDER A PROXY GROUP OF DOMESTIC, NON-PRICE
4 REGULATED COMPANIES?

5 A. Although I am not an attorney, my interpretation of the *Hope* and *Bluefield* cases
6 is that they did not specify that comparable risk companies had to be utilities.
7 Since the purpose of rate regulation is to be a substitute for marketplace
8 competition, non-price regulated firms operating in the competitive
9 marketplace make an excellent proxy if they are comparable in total risk to the
10 Utility Proxy Group being used to estimate the cost of common equity. The
11 selection of such domestic, non-price regulated competitive firms theoretically
12 and empirically results in a proxy group which is comparable in total risk to the
13 Utility Proxy Group, since all of these companies compete for capital in the
14 exact same markets.

15
16 Q. HOW DID YOU SELECT NON-PRICE REGULATED COMPANIES THAT ARE
17 COMPARABLE IN TOTAL RISK TO THE UTILITY PROXY GROUP?

18 A. In order to select a proxy group of domestic, non-price regulated companies
19 similar in total risk to the Utility Proxy Group, I relied on the Beta coefficients
20 and related statistics derived from *Value Line* regression analyses of weekly
21 market prices over the most recent 260 weeks (*i.e.*, five years). These selection
22 criteria resulted in a proxy group of 50 domestic, non-price regulated firms
23 comparable in total risk to the Utility Proxy Group. Total risk is the sum of
24 non-diversifiable market risk and diversifiable company-specific risks. The
25 criteria used in selecting the domestic, non-price regulated firms was:

- 1 (i) They must be covered by *Value Line* (Standard Edition);
2 (ii) They must be domestic, non-price regulated companies, *i.e.*, not utilities;
3 (iii) Their Beta coefficients must lie within plus or minus two standard deviations of
4 the average unadjusted Beta coefficients of the Utility Proxy Group; and
5 (iv) The residual standard errors of the *Value Line* regressions which gave rise to the
6 unadjusted Beta coefficients must lie within plus or minus two standard
7 deviations of the average residual standard error of the Utility Proxy Group.

8
9 Beta coefficients measure market, or systematic, risk, which is not diversifiable.
10 The residual standard errors of the regressions measure each firm's company-
11 specific, diversifiable risk. Companies that have similar Beta coefficients and
12 similar residual standard errors resulting from the same regression analyses have
13 similar total investment risk.

14

15 Q. HAVE YOU PREPARED A SCHEDULE WHICH SHOWS THE DATA FROM WHICH YOU
16 SELECTED THE 50 DOMESTIC, NON-PRICE REGULATED COMPANIES THAT ARE
17 COMPARABLE IN TOTAL RISK TO THE UTILITY PROXY GROUP?

18 A. Yes, the basis of my selection and both proxy groups' regression statistics are
19 shown in Exhibit____(DWD-1), Schedule 8.

20

21 Q. DID YOU CALCULATE COMMON EQUITY COST RATES USING THE DCF MODEL,
22 RPM, AND CAPM FOR THE NON-PRICE REGULATED PROXY GROUP?

23 A. Yes. Because the DCF model, RPM, and CAPM have been applied in an
24 identical manner as described above, I will not repeat the details of the rationale
25 and application of each model. One exception is in the application of the RPM,

1 where I did not use public utility-specific equity risk premiums, nor did I apply
2 the PRPM to the individual non-price regulated companies.

3
4 Page 2 of Exhibit____(DWD-1), Schedule 9 derives the Constant Growth DCF
5 model common equity cost rate, and page 3 of Exhibit____(DWD-1), Schedule
6 9 derives the two growth DCF model common equity cost rate. As shown, the
7 indicated common equity cost rate, using an average of the constant growth
8 DCF and the two growth DCF for the Non-Price Regulated Proxy Group
9 comparable in total risk to the Utility Proxy Group, is 12.19%.

10
11 Pages 4 through 6 of Exhibit____(DWD-1), Schedule 9 contain the data and
12 calculations that support the 12.64% RPM common equity cost rate. As shown
13 on line 1, page 4 of Exhibit____(DWD-1), Schedule 9, the consensus prospective
14 yield on Moody's Baa-rated corporate bonds for the six quarters ending in the
15 third quarter of 2022, and for the years 2023 to 2027 and 2028 to 2032, is
16 4.30%.⁵⁸ Since the Non-Price Regulated Proxy Group has an average Moody's
17 long-term issuer rating of Baa1, a downward adjustment of 0.12% to the
18 projected Baa2 rated corporate bond yield is necessary to reflect the difference
19 in ratings which results in a projected Baa1-rated corporate bond yield of 4.18%.

20
21 When the Beta-adjusted risk premium of 8.46%⁵⁹ relative to the Non-Price
22 Regulated Proxy Group is added to the prospective Baa1-rated corporate bond
23 yield of 4.18%, the indicated RPM common equity cost rate is 12.64%.

58 *Blue Chip Financial Forecasts*, June 1, 2021, at 2, 14.

59 Derived on page 6 of Exhibit____(DWD-1), Schedule 9.

1 Page 7 of Exhibit___(DWD-1), Schedule 9 contains the inputs and calculations
2 that support my indicated CAPM/ECAPM common equity cost rate of 12.01%.

3
4 Q. HOW IS THE COST RATE OF COMMON EQUITY BASED ON THE NON-PRICE
5 REGULATED PROXY GROUP COMPARABLE IN TOTAL RISK TO THE UTILITY
6 PROXY GROUP?

7 A. As shown on page 1 of Exhibit___(DWD-1), Schedule 9, the results of the
8 common equity models applied to the Non-Price Regulated Proxy Group --
9 which is comparable in total risk to the Utility Proxy Group -- are as follows:
10 12.19% (DCF), 12.64% (RPM), and 12.01% (CAPM). The average of the mean
11 and median of these models is 12.24%, which I used as the indicated common
12 equity cost rates for the Non-Price Regulated Proxy Group.

13
14 **VIII. CONCLUSION OF COMMON EQUITY COST ANALYTICAL**
15 **RESULTS BEFORE ADJUSTMENTS**

16
17 Q. BASED ON YOUR ANALYSES, WHAT IS THE INDICATED COMMON EQUITY COST
18 RATE BEFORE ADJUSTMENTS?

19 A. By applying multiple cost of common equity models to the Utility Proxy Group
20 and the Non-Price Regulated Proxy Group, the indicated range of common
21 equity cost rates attributable to the Utility Proxy Group before any relative risk
22 adjustments is between 9.65% and 11.65%. I used multiple cost of common
23 equity models as primary tools in arriving at my recommended common equity
24 cost rate, because each of these models is theoretically sound and available to
25 investors and because no single model is so inherently precise that it can be

1 relied on to the exclusion of other theoretically sound models. Using multiple
2 models adds reliability to the estimated common equity cost rate, with the
3 prudence of using multiple cost of common equity models supported in both
4 the financial literature and regulatory precedent.

5
6 Based on these common equity cost results, I conclude that a range of common
7 equity cost rates between 9.65% and 11.65% is reasonable and appropriate
8 before any adjustments for relative risk differences between the Company and
9 the Utility Proxy Group are made.

10
11 **IX. ADJUSTMENTS TO THE**
12 **COMMON EQUITY COST RATE**

13
14 **A. Business Risk Adjustment**

15 Q. WHAT COMPANY-SPECIFIC BUSINESS RISKS DID YOU CONSIDER IN YOUR
16 RELATIVE RISK ANALYSIS?

17 A. As detailed below I considered NSP's small size and its high levels of customer
18 growth and capital expenditures relative to the Utility Proxy Group.

19
20 Q. PLEASE COMPARE NSP'S SIZE WITH THAT OF THE UTILITY PROXY GROUP.

21 A. As shown on Table 8, below, NSP is smaller than the median utility in the Utility
22 Proxy Group, as measured by market capitalization.

Table 8
Size as Measured by Market Capitalization for NSPM's
Electric Operations and the Utility Proxy Group

	Market Capitalization* (\$ Millions)	Times Greater than The Company
NSP MN Jurisdictional	\$11,194.007	
Utility Proxy Group	\$15,189.501	1.4x
*From page 1 of Exhibit____(DWD-1), Schedule 10.		

The Company's estimated market capitalization for its Minnesota operations was \$11,194.007 million as of August 31, 2021, compared with the market capitalization of the average company in the Utility Proxy Group of \$15,189.501 million as of August 31, 2021. The average company in the Utility Proxy Group has a market capitalization 1.4 times the size of the Company's estimated Minnesota-based market capitalization.

Q. SINCE NSP IS PART OF A LARGER COMPANY, WHY IS THE SIZE OF XEI NOT MORE APPROPRIATE TO USE WHEN DETERMINING THE SIZE ADJUSTMENT?

A. The return derived in this proceeding will not apply to XEI's operations as a whole, but only to the Company's Minnesota operations. XEI is the sum of its constituent parts, including those constituent parts' ROEs. Potential investors in the Parent are aware that it is a combination of operations in each state, and that each state's operations experience the operating risks specific to their jurisdiction. The market's expectation of XEI's return is commensurate with

1 the realities of the Company's composite operations in each of the states in
2 which it operates. That said, I recognize that NSP's Minnesota electric
3 operations are a portion of NSP's overall operations.

4
5 Q. SHOULD THE COMPANY BE COMPARED WITH OTHER OPERATING ELECTRIC
6 UTILITIES IN MINNESOTA TO DETERMINE ANY ADJUSTMENT TO THE PROXY
7 GROUP-DERIVED ROE?

8 A. No, it shouldn't. Since the indicated ROE is determined using the market data
9 of the Utility Proxy Group, any type of adjustment to the indicated ROE must
10 reflect relative differences between the Company and the Utility Proxy Group.
11 Since this is the case, the relative size of other Minnesota utilities is not relevant
12 to determining the ROE for the Company.

13
14 Q. DOES THE COMPANY'S SMALLER SIZE RELATIVE TO THE UTILITY PROXY GROUP
15 COMPANIES INCREASE ITS BUSINESS RISK?

16 A. Yes. As a preliminary matter, because I have developed my cost of common
17 equity recommendation for the Company's Minnesota operations based on
18 market data applied to the Utility Proxy Group of risk-comparable companies,
19 in order to assess the Company's risk associated with its relatively smaller size
20 of its Minnesota operations, it is necessary to compare the Company's
21 Minnesota-jurisdictional size relative to the Utility Proxy Group. The
22 Company's smaller size relative to the Utility Proxy Group companies indicates
23 greater relative business risk for the Company because, all else being equal, size
24 has a material bearing on risk.

1 Size affects business risk because smaller companies generally are less able to
2 cope with significant events that affect sales, revenues, and earnings. For
3 example, smaller companies face more risk exposure to business cycles and
4 economic conditions, both nationally and locally. Additionally, the loss of
5 revenues from a few larger customers would have a greater effect on a small
6 company than on a bigger company with a larger, more diverse, customer base.
7 This is true for utilities, as well as for non-regulated companies.

8
9 As further evidence that smaller firms are riskier, investors generally demand
10 greater returns from smaller firms to compensate for less marketability and
11 liquidity of their securities. Duff & Phelps' 2020 Valuation Handbook – U.S.
12 Guide to Cost of Capital (D&P - 2020) discusses the nature of the small-size
13 phenomenon, providing an indication of the magnitude of the size premium
14 based on several measures of size. In discussing “Size as a Predictor of Equity
15 Returns,” D&P - 2020 states:

16
17 The size effect is based on the empirical observation that companies of
18 smaller size are associated with greater risk and, therefore, have greater
19 cost of capital [sic]. The “size” of a company is one of the most
20 important risk elements to consider when developing cost of equity
21 capital estimates for use in valuing a business simply because size has
22 been shown to be a *predictor* of equity returns. In other words, there is a
23 significant (negative) relationship between size and historical equity

1 returns - as size *decreases*, returns tend to *increase*, and vice versa.
2 (footnote omitted) (emphasis in original)⁶⁰

3
4 Furthermore, in “The Capital Asset Pricing Model: Theory and Evidence,”
5 Fama and French note size is indeed a risk factor which must be reflected when
6 estimating the cost of common equity. On page 37, they note:

7
8 . . . the higher average returns on small stocks and high book-to-
9 market stocks reflect unidentified state variables that produce
10 undiversifiable risks (covariances) in returns not captured in the market
11 return and are priced separately from market betas.⁶¹

12
13 Based on this evidence, Fama and French proposed their three-factor model
14 which includes a size variable in recognition of the effect size has on the cost of
15 common equity.

16
17 Also, it is a basic financial principle that the use of funds invested, and not the
18 source of funds, is what gives rise to the risk of any investment.⁶² Eugene
19 Brigham, a well-known authority, states:

20
21 A number of researchers have observed that portfolios of small-firms
22 (sic) have earned consistently higher average returns than those of

60 Duff & Phelps Valuation Handbook – U.S. Guide to Cost of Capital, Wiley 2020, at 4-1.

61 Fama & French, at 25-43.

62 Richard A. Brealey and Stewart C. Myers, Principles of Corporate Finance (McGraw-Hill Book Company, 1996), at 204-205, 229.

1 large-firm stocks; this is called the “small-firm effect.” On the surface,
2 it would seem to be advantageous to the small firms to provide average
3 returns in a stock market that are higher than those of larger firms. In
4 reality, it is bad news for the small firm; what the small-firm effect
5 means is that the capital market demands higher returns on stocks of
6 small firms than on otherwise similar stocks of the large firms.

7 (emphasis added)⁶³

8
9 Consistent with the financial principle of risk and return discussed above,
10 increased relative risk due to small size must be considered in the allowed rate
11 of return on common equity. Therefore, the Commission’s authorization of a
12 cost rate of common equity in this proceeding must appropriately reflect the
13 unique risks of the Company, including its small relative size to the Utility Proxy
14 Group, which is justified and supported above by evidence in the financial
15 literature.

16
17 Q. EARLIER YOU EXPLAINED THAT CREDIT RATINGS CAN ACT AS A PROXY FOR A
18 FIRM’S COMBINED BUSINESS AND FINANCIAL RISKS TO EQUITY OWNERS. DO
19 RATING AGENCIES ACCOUNT FOR COMPANY SIZE IN THEIR BOND RATINGS?

20 A. No. Neither S&P nor Moody’s have minimum company size requirements for
21 any given rating level. This means, all else equal, a relative size analysis must be
22 conducted for equity investments in companies with similar bond ratings.

63 Eugene F. Brigham, Fundamentals of Financial Management, Fifth Edition (The Dryden Press, 1989), at 623.

1 Q. PLEASE DESCRIBE THE COMPANY’S HIGH CUSTOMER GROWTH.

2 A. NSP’s total number of retail customers is expected to increase by approximately
3 57,300 (i.e., 4.3%) over the next five years.⁶⁴ The increased customer growth in
4 NSP’s service territory necessitates increased capital investment.

5

6 Q. PLEASE BRIEFLY SUMMARIZE THE COMPANY’S CAPITAL INVESTMENT PLANS.

7 A. NSP currently plans to invest approximately \$7,507 million of additional capital
8 over the 2021-2024 period,⁶⁵ which represents approximately 65% of its 2021
9 year-end net utility plant.⁶⁶ That amount includes investments required to
10 support growth, and to maintain safe, sufficient, and reliable service in both its
11 transmission and distribution facilities. The Company will require continued
12 access to the capital markets, at reasonable terms, to finance its capital spending
13 plan. As the Company moves forward with its capital spending plan, timely
14 recovery of its capital costs is critical to mitigate the delay of capital recovery
15 and execute its capital spending program.

16

17 Q. DO SUBSTANTIAL CAPITAL EXPENDITURES DIRECTLY RELATE TO A UTILITY
18 BEING ALLOWED THE OPPORTUNITY TO EARN A RETURN ADEQUATE TO
19 ATTRACT CAPITAL AT REASONABLE TERMS?

20 A. Yes, they do. The allowed ROE should enable the subject utility to finance
21 capital expenditures and working capital requirements at reasonable rates, and
22 to maintain its financial integrity in a variety of economic and capital market
23 conditions. As discussed throughout my direct testimony, a return adequate to

64 Company provided data (2021-2026).

65 Company provided data.

66 *Ibid.*, at G-3.

1 attract capital at reasonable terms enables the utility to provide safe, reliable
2 service while maintaining its financial soundness. To the extent a utility is
3 provided the opportunity to earn its market-based cost of capital, neither
4 customers nor shareholders should be disadvantaged. These requirements are
5 of particular importance to a utility when it is engaged in a substantial capital
6 expenditure program.

7
8 The ratemaking process is predicated on the principle that, for investors and
9 companies to commit the capital needed to provide safe and reliable utility
10 services, the utility must have the opportunity to recover the return of, and the
11 market-required return on, invested capital. Regulatory commissions recognize
12 that since utility operations are capital intensive, regulatory decisions should
13 enable the utility to attract capital at reasonable terms; doing so balances the
14 long-term interests of the utility and its ratepayers.

15
16 Further, the financial community carefully monitors the current and expected
17 financial conditions of utility companies, as well as the regulatory environment
18 in which those companies operate. In that respect, the regulatory environment
19 is one of the most important factors considered in both debt and equity
20 investors' assessments of risk. That is especially important during periods in
21 which the utility expects to make significant capital investments and, therefore,
22 may require access to capital markets.

1 Q. DO CREDIT RATING AGENCIES RECOGNIZE RISK ASSOCIATED WITH INCREASED
2 CAPITAL EXPENDITURES?

3 A. Yes, they do. From a credit perspective, the additional pressure on cash flows
4 associated with high levels of capital expenditures exerts corresponding
5 pressure on credit metrics and, therefore, credit ratings. S&P has noted several
6 long-term challenges for utilities' financial health including: heavy construction
7 programs to address demand growth; declining capacity margins; and aging
8 infrastructure and regulatory responsiveness to mounting requests for rate
9 increases.⁶⁷ More recently, S&P noted:

10 We assume that capital spending will remain a focus of most utility
11 managements and strain credit metrics. It provides growth when sales are
12 diminished by ongoing demanded efficiency from regulators and other
13 trends, and it is welcomed by policymakers that appreciate the economic
14 stimulus and the benefits of safer, more reliable service. The speed with
15 which the regulatory process turns the new spending into higher rates to
16 begin to pay for it is an important factor in our assumptions and the
17 forecast. Any extended lag between spending and recovery can exacerbate
18 the negative effect on credit metrics and therefore ratings.⁶⁸

19
20 The rating agency views noted above also are consistent with certain
21 observations discussed in my direct testimony: (1) the benefits of maintaining a

67 Standard & Poor's, Industry Report Card: Utility Sectors in the Americas Remain Stable, While Challenges Beset European, Australian, and New Zealand Counterparts, RatingsDirect, June 27, 2008, at 4.

68 Standard & Poor's, *Industry Top Trends 2017: Utilities*, RatingsDirect, February 16, 2017, at 4.

1 strong financial profile are significant when capital access is required and
2 become particularly acute during periods of market instability; and (2) the
3 Commission's decision in this proceeding will have a direct bearing on the
4 company's credit profile and its ability to access the capital needed to fund its
5 investments.

6
7 Q. HOW DO THE COMPANY'S EXPECTED CAPITAL EXPENDITURES COMPARE TO
8 THE UTILITY PROXY GROUP?

9 A. To reasonably make that comparison, I calculated the ratio of expected capital
10 expenditures to net plant for each company in the Utility Proxy Group. I
11 performed that calculation using NSP's projected capital expenditures during
12 the period 2021 through 2024 relative to its net plant for the year ended
13 December 31, 2020. As shown in Exhibit___(DWD-1), Schedule 11, NSP has
14 the highest ratio of projected capital expenditures to net plant relative to the
15 Utility Proxy Group, approximately 78% higher than the Utility Proxy Group
16 median.

17
18 Q. WHAT ARE YOUR CONCLUSIONS REGARDING THE EFFECT OF NSP'S CAPITAL
19 INVESTMENT PLAN ON ITS RISK PROFILE AND COST OF CAPITAL?

20 A. It is clear that NSP's capital investment plan relative to net plant is larger than
21 the median of the Utility Proxy Group companies. It also is clear that equity
22 investors and credit rating agencies recognize the additional risks associated
23 with substantial capital expenditures.

1 Q. WHAT IS YOUR CONCLUSION REGARDING THE COMPANY'S RELATIVE RISK AS
2 COMPARED TO THE UTILITY PROXY GROUP?

3 A. In view of the above, the Company is smaller and faces a higher level of
4 expected capital expenditures than the Utility Proxy Group. Since the cost of
5 capital is a comparative exercise, the Company faces relatively higher risk than
6 the Utility Proxy Group.

7

8 Q. CAN A RELATIVE RISK ADJUSTMENT BE QUANTIFIED FOR THE COMPANY?

9 A. Yes. As discussed above, NSP has greater relative risk than the Utility Proxy
10 Group. As a result, it is necessary to upwardly adjust the indicated range of
11 common equity cost rates attributable to the Utility Proxy Group to reflect the
12 Company's greater risk due to its greater business risk. As a proxy for the
13 business risk adjustment, I will use the SBBI-2021 size study. The determination
14 of the business risk adjustment is based on the size premiums for portfolios of
15 the New York Stock Exchange, American Stock Exchange, and NASDAQ
16 listed companies, ranked by deciles for the 1926 to 2020 period.⁶⁹ The average
17 size premium for the Utility Proxy Group with a market capitalization of
18 \$15,189.501 million falls in the 2nd decile, while the Company's estimated market
19 capitalization of \$11,194.007 million places it in the 3rd decile. The size premium
20 spread between the 2nd decile and the 3rd decile is 0.22%.⁷⁰ Even though a 0.22%
21 upward risk adjustment to the common cost of equity is indicated, I only applied
22 a risk premium of 0.05% to the Company's indicated common equity cost rate
23 to reflect that the Company's Minnesota electric operations are a portion of

69 Source: Duff & Phelps Cost of Capital Navigator.

70 *Ibid.*, See also, Exhibit__(DWD-1), Schedule 10.

1 NSP's overall operations and benefit from that relationship. I believe 0.05% is
2 a conservative adjustment due to the Company's higher relative risk.

3
4 **B. Credit Risk Adjustment**

5 Q. Please discuss your proposed credit risk adjustment.

6 A. NSP's long-term issuer ratings are A2 and A- from Moody's Investors Services
7 and S&P, respectively, which are slightly less risky than the average long-term
8 issuer ratings for the Utility Proxy Group of A3/Baa1 and BBB+, respectively.⁷¹
9 Hence, a downward credit risk adjustment is necessary to reflect the higher
10 credit rating, *i.e.*, A2, of the Company relative to the A3/Baa1 average Moody's
11 bond rating of the Utility Proxy Group.⁷²

12
13 An indication of the magnitude of the necessary downward adjustment to
14 reflect the lower credit risk inherent in an A2 bond rating is one-half of a recent
15 three-month average spread between Moody's Baa and A-rated public utility
16 bond yields of 0.25%, shown on page 4 of Exhibit___(DWD-1), Schedule 6, or
17 negative 0.13%.⁷³

71 Source of Information: S&P Global Market Intelligence.

72 As shown on page 5 of Exhibit___(DWD-1), Schedule 6.

73 $0.13\% = 0.25\% * (1/2)$. Moody's does not provide public utility bond yields for A3/Baa1-rated bonds. As such, it was necessary to estimate the difference between A2-rated and A3/Baa1-rated public utility bonds. Because there are three steps between Baa2 and A2 (Baa2 to Baa1, Baa1 to A3, and A3 to A2) I assumed an adjustment of one-half of the difference between the A2-rated and Baa2-rated public utility bond yield was appropriate to reflect the proxy group's average rating of A3/Baa1.

1 **C. Flotation Costs**

2 Q. WHAT ARE FLOTATION COSTS?

3 A. Flotation costs are those costs associated with the sale of new issuances of
4 common stock. They include market pressure and the mandatory unavoidable
5 costs of issuance (*e.g.*, underwriting fees and out-of-pocket costs for printing,
6 legal, registration, etc.). For every dollar raised through debt or equity offerings,
7 the Company receives less than one full dollar in financing.

8
9 Q. WHY IS IT IMPORTANT TO RECOGNIZE FLOTATION COSTS IN THE ALLOWED
10 COMMON EQUITY COST RATE?

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

15
16 The costs of issuing these securities are just as real as operating and
17 maintenance expenses or costs incurred to build utility plants, and fair
18 regulatory treatment must permit recovery of these costs....

19
20 The simple fact of the matter is that common equity capital is not
21 free....[Flotation costs] must be recovered through a rate of return
22 adjustment.⁷⁴

74 Morin, at p. 321.

1 Q. DO THE COMMON EQUITY COST RATE MODELS YOU HAVE USED ALREADY
2 REFLECT INVESTORS' ANTICIPATION OF FLOTATION COSTS?

3 A. No. All of these models assume no transaction costs. The literature is quite
4 clear that these costs are not reflected in the market prices paid for common
5 stocks. For example, Brigham and Daves confirm this and provide the
6 methodology utilized to calculate the flotation adjustment.⁷⁵ In addition, Morin
7 confirms the need for such an adjustment even when no new equity issuance is
8 imminent.⁷⁶ Consequently, it is proper to include a flotation cost adjustment
9 when using cost of common equity models to estimate the common equity cost
10 rate.

11

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

13 A. I modified the DCF calculation to provide a dividend yield that would
14 reimburse investors for issuance costs in accordance with the method cited in
15 literature by Brigham and Daves, as well as by Morin. The flotation cost
16 adjustment recognizes the actual costs of issuing equity that were incurred by
17 XEI. Based on the issuance costs shown on page 1 of Exhibit__(DWD-1),
18 Schedule 12, an adjustment of 0.12% is required to reflect the flotation costs
19 applicable to the Utility Proxy Group.

20

21 Q. WHAT IS THE INDICATED COST OF COMMON EQUITY AFTER YOUR COMPANY-
22 SPECIFIC ADJUSTMENTS?

23 A. Applying the 0.05% business risk adjustment, the negative 0.13% credit risk

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

76 Morin, at pp. 327-30.

1 adjustment, and the 0.12% flotation cost adjustment to the indicated range of
2 common equity cost rates between 9.65% and 11.65% results in a Company-
3 specific range of common equity rates between 9.69% and 11.69%. From this
4 range, I recommend an ROE for the Company toward the lower end of my
5 Company-specific range, specifically 10.20%.

6
7 Q. HAVE YOU REVIEWED THE TESTIMONY OF COMPANY WITNESS MR. TIMOTHY
8 LYONS PROPOSING AN ROE ADJUSTMENT MECHANISM BEGINNING IN 2024?

9
10 A. Yes. Mr. Lyons supports the Company's proposal to adjust the ROE in 2024
11 if there are significant changes in financial market conditions during the term of
12 the MYRP. The adjustment mechanism would examine the movement in
13 Moody's Aa utility bond yield and if the deviation in October 2022 through
14 September 2023 average yield exceeds 100 basis points compared to the
15 Benchmark yield, the authorized ROE for 2024 would be adjusted by 50 percent
16 of the deviation between current yield and the Benchmark yield.

17 Q. Does this adjustment mechanism impact your recommended ROE in this
18 proceeding?

19 A. No, it does not.

1 **X. CONCLUSION**

2

3 Q. WHAT IS YOUR RECOMMENDED ROE FOR THE COMPANY?

4 A. Given the discussion above and the results from the analyses, I recommend that
5 an ROE of 10.20% is appropriate for the Company at this time.

6

7 Q. IN YOUR OPINION, IS YOUR PROPOSED ROE OF 10.20% FAIR AND REASONABLE
8 TO NSP AND ITS CUSTOMERS?

9 A. Yes, it is.

10

11 Q. IN YOUR OPINION, IS NSP'S PROPOSED CAPITAL STRUCTURE CONSISTING OF
12 52.50% COMMON EQUITY, 0.61% SHORT-TERM DEBT, AND 46.89% LONG-TERM
13 DEBT FAIR AND REASONABLE?

14 A. Yes, they are.

15

16 Q. IN YOUR OPINION, IS NSP'S PROPOSED COST OF LONG-TERM DEBT OF 4.13%
17 FAIR AND REASONABLE?

18 A. Yes, they are.

19

20 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

21 A. Yes, it does.

Summary

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

Areas of Specialization

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

Recent Expert Testimony Submission/Appearance

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

Recent Assignments

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

Recent Articles and Speeches

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

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

Sponsor	Date	Case/Applicant	Docket No.	Subject
Illinois Commerce Commission				
Utility Services of Illinois, Inc.	02/21	Utility Services of Illinois, Inc.	Docket No. 21-0198	Rate of Return
Ameren Illinois Company d/b/a Ameren Illinois	07/20	Ameren Illinois Company d/b/a Ameren Illinois	Docket No. 20-0308	Return on Equity
Utility Services of Illinois, Inc.	11/17	Utility Services of Illinois, Inc.	Docket No. 17-1106	Cost of Service / Rate Design
Aqua Illinois, Inc.	04/17	Aqua Illinois, Inc.	Docket No. 17-0259	Rate of Return
Utility Services of Illinois, Inc.	04/15	Utility Services of Illinois, Inc.	Docket No. 14-0741	Rate of Return
Indiana Utility Regulatory Commission				
Aqua Indiana, Inc.	03/16	Aqua Indiana, Inc. Aboite Wastewater Division	Docket No. 44752	Rate of Return
Twin Lakes, Utilities, Inc.	08/13	Twin Lakes, Utilities, Inc.	Docket No. 44388	Rate of Return
Kansas Corporation Commission				
Atmos Energy	07/19	Atmos Energy	19-ATMG-525-RTS	Rate of Return
Kentucky Public Service Commission				
Atmos Energy Corporation	07/21	Atmos Energy Corporation	2021-00304	PRP Rider Rate
Atmos Energy Corporation	06/21	Atmos Energy Corporation	2021-00214	Rate of Return
Duke Energy Kentucky, Inc.	06/21	Duke Energy Kentucky, Inc.	2021-00190	Return on Equity
Bluegrass Water Utility Operating Company	10/20	Bluegrass Water Utility Operating Company	2020-00290	Return on Equity
Louisiana Public Service Commission				
Utilities, Inc. of Louisiana	05/21	Utilities, Inc. of Louisiana	Docket No. U-36003	Rate of Return
Southwestern Electric Power Company	12/20	Southwestern Electric Power Company	Docket No. U-35441	Return on Equity
Atmos Energy	04/20	Atmos Energy	Docket No. U-35535	Rate of Return
Louisiana Water Service, Inc.	06/13	Louisiana Water Service, Inc.	Docket No. U-32848	Rate of Return
Maine Public Utilities Commission				
The Maine Water Company	09/21	The Maine Water Company	Docket No. 2021-00053	Rate of Return
Maryland Public Service Commission				
Washington Gas Light Company	08/20	Washington Gas Light Company	Case No. 9651	Rate of Return
FirstEnergy, Inc.	08/18	Potomac Edison Company	Case No. 9490	Rate of Return
Massachusetts Department of Public Utilities				
Unitil Corporation	12/19	Fitchburg Gas & Electric Co. (Elec.)	D.P.U. 19-130	Rate of Return
Unitil Corporation	12/19	Fitchburg Gas & Electric Co. (Gas)	D.P.U. 19-131	Rate of Return
Liberty Utilities	07/15	Liberty Utilities d/b/a New England Natural Gas Company	Docket No. 15-75	Rate of Return
Minnesota Public Utilities Commission				
Northern States Power Company	11/20	Northern States Power Company	Docket No. E002/GR-20-723	Rate of Return
Mississippi Public Service Commission				
Atmos Energy	03/19	Atmos Energy	Docket No. 2015-UN-049	Capital Structure
Atmos Energy	07/18	Atmos Energy	Docket No. 2015-UN-049	Capital Structure
Missouri Public Service Commission				
Spire Missouri, Inc.	12/20	Spire Missouri, Inc.	Case No. GR-2021-0108	Return on Equity
Indian Hills Utility Operating Company, Inc.	10/17	Indian Hills Utility Operating Company, Inc.	Case No. SR-2017-0259	Rate of Return



Sponsor	Date	Case/Applicant	Docket No.	Subject
Raccoon Creek Utility Operating Company, Inc.	09/16	Raccoon Creek Utility Operating Company, Inc.	Docket No. SR-2016-0202	Rate of Return
Public Utilities Commission of Nevada				
Southwest Gas Corporation	09/21	Southwest Gas Corporation	Docket No. 21-09001	Return on Equity
Southwest Gas Corporation	08/20	Southwest Gas Corporation	Docket No. 20-02023	Return on Equity
New Hampshire Public Utilities Commission				
Aquarion Water Company of New Hampshire, Inc.	12/20	Aquarion Water Company of New Hampshire, Inc.	Docket No. DW 20-184	Rate of Return
New Jersey Board of Public Utilities				
Middlesex Water Company	05/21	Middlesex Water Company	Docket No. WR21050813	Rate of Return
Atlantic City Electric Company	12/20	Atlantic City Electric Company	Docket No. ER20120746	Return on Equity
FirstEnergy	02/20	Jersey Central Power & Light Co.	Docket No. ER20020146	Rate of Return
Aqua New Jersey, Inc.	12/18	Aqua New Jersey, Inc.	Docket No. WR18121351	Rate of Return
Middlesex Water Company	10/17	Middlesex Water Company	Docket No. WR17101049	Rate of Return
Middlesex Water Company	03/15	Middlesex Water Company	Docket No. WR15030391	Rate of Return
The Atlantic City Sewerage Company	10/14	The Atlantic City Sewerage Company	Docket No. WR14101263	Cost of Service / Rate Design
Middlesex Water Company	11/13	Middlesex Water Company	Docket No. WR1311059	Capital Structure
New Mexico Public Regulation Commission				
Southwestern Public Service Company	01/21	Southwestern Public Service Company	Case No. 20-00238-UT	Return on Equity
North Carolina Utilities Commission				
Carolina Water Service, Inc.	07/21	Carolina Water Service, Inc.	Docket No. W-354 Sub 384	Rate of Return
Piedmont Natural Gas Co., Inc.	03/21	Piedmont Natural Gas Co., Inc.	Docket No. G-9, Sub 781	Return on Equity
Duke Energy Carolinas, LLC	07/20	Duke Energy Carolinas, LLC	Docket No. E-7, Sub 1214	Return on Equity
Duke Energy Progress, LLC	07/20	Duke Energy Progress, LLC	Docket No. E-2, Sub 1219	Return on Equity
Aqua North Carolina, Inc.	12/19	Aqua North Carolina, Inc.	Docket No. W-218 Sub 526	Rate of Return
Carolina Water Service, Inc.	06/19	Carolina Water Service, Inc.	Docket No. W-354 Sub 364	Rate of Return
Carolina Water Service, Inc.	09/18	Carolina Water Service, Inc.	Docket No. W-354 Sub 360	Rate of Return
Aqua North Carolina, Inc.	07/18	Aqua North Carolina, Inc.	Docket No. W-218 Sub 497	Rate of Return
North Dakota Public Service Commission				
Northern States Power Company	09/21	Northern States Power Company	Case No. PU-21-381	Rate of Return
Northern States Power Company	11/20	Northern States Power Company	Case No. PU-20-441	Rate of Return
Public Utilities Commission of Ohio				
Aqua Ohio, Inc.	07/21	Aqua Ohio, Inc.	Docket No. 21-0595-WW-AIR	Rate of Return
Aqua Ohio, Inc.	05/16	Aqua Ohio, Inc.	Docket No. 16-0907-WW-AIR	Rate of Return
Pennsylvania Public Utility Commission				
Community Utilities of Pennsylvania, Inc.	04/21	Community Utilities of Pennsylvania, Inc.	Docket No. R-2021-3025207	Rate of Return
Vicinity Energy Philadelphia, Inc.	04/21	Vicinity Energy Philadelphia, Inc.	Docket No. R-2021-3024060	Rate of Return
Delaware County Regional Water Control Authority	02/20	Delaware County Regional Water Control Authority	Docket No. A-2019-3015173	Valuation
Valley Energy, Inc.	07/19	C&T Enterprises	Docket No. R-2019-3008209	Rate of Return
Wellsboro Electric Company	07/19	C&T Enterprises	Docket No. R-2019-3008208	Rate of Return
Citizens' Electric Company of Lewisburg	07/19	C&T Enterprises	Docket No. R-2019-3008212	Rate of Return
Steelton Borough Authority	01/19	Steelton Borough Authority	Docket No. A-2019-3006880	Valuation



Sponsor	Date	Case/Applicant	Docket No.	Subject
Mahoning Township, PA	08/18	Mahoning Township, PA	Docket No. A-2018-3003519	Valuation
SUEZ Water Pennsylvania Inc.	04/18	SUEZ Water Pennsylvania Inc.	Docket No. R-2018-000834	Rate of Return
Columbia Water Company	09/17	Columbia Water Company	Docket No. R-2017-2598203	Rate of Return
Veolia Energy Philadelphia, Inc.	06/17	Veolia Energy Philadelphia, Inc.	Docket No. R-2017-2593142	Rate of Return
Emporium Water Company	07/14	Emporium Water Company	Docket No. R-2014-2402324	Rate of Return
Columbia Water Company	07/13	Columbia Water Company	Docket No. R-2013-2360798	Rate of Return
Penn Estates Utilities, Inc.	12/11	Penn Estates, Utilities, Inc.	Docket No. R-2011-2255159	Capital Structure / Long-Term Debt Cost Rate
South Carolina Public Service Commission				
Blue Granite Water Co.	12/19	Blue Granite Water Company	Docket No. 2019-292-WS	Rate of Return
Carolina Water Service, Inc.	02/18	Carolina Water Service, Inc.	Docket No. 2017-292-WS	Rate of Return
Carolina Water Service, Inc.	06/15	Carolina Water Service, Inc.	Docket No. 2015-199-WS	Rate of Return
Carolina Water Service, Inc.	11/13	Carolina Water Service, Inc.	Docket No. 2013-275-WS	Rate of Return
United Utility Companies, Inc.	09/13	United Utility Companies, Inc.	Docket No. 2013-199-WS	Rate of Return
Utility Services of South Carolina, Inc.	09/13	Utility Services of South Carolina, Inc.	Docket No. 2013-201-WS	Rate of Return
Tega Cay Water Services, Inc.	11/12	Tega Cay Water Services, Inc.	Docket No. 2012-177-WS	Capital Structure
Tennessee Public Utility Commission				
Piedmont Natural Gas Company	07/20	Piedmont Natural Gas Company	Docket No. 20-00086	Return on Equity
Public Utility Commission of Texas				
Southwestern Public Service Company	02/21	Southwestern Public Service Company	Docket No. 51802	Return on Equity
Southwestern Electric Power Company	10/20	Southwestern Electric Power Company	Docket No. 51415	Rate of Return
Virginia State Corporation Commission				
Virginia Natural Gas, Inc.	04/21	Virginia Natural Gas, Inc.	PUR-2020-00095	Return on Equity
Massanutten Public Service Corporation	12/20	Massanutten Public Service Corporation	PUE-2020-00039	Return on Equity
Aqua Virginia, Inc.	07/20	Aqua Virginia, Inc.	PUR-2020-00106	Rate of Return
WGL Holdings, Inc.	07/18	Washington Gas Light Company	PUR-2018-00080	Rate of Return
Atmos Energy Corporation	05/18	Atmos Energy Corporation	PUR-2018-00014	Rate of Return
Aqua Virginia, Inc.	07/17	Aqua Virginia, Inc.	PUR-2017-00082	Rate of Return
Massanutten Public Service Corp.	08/14	Massanutten Public Service Corp.	PUE-2014-00035	Rate of Return / Rate Design

Northern States Power Company
Brief Summary of Common Equity Cost Rate

<u>Line No.</u>	<u>Principal Methods</u>	<u>Proxy Group of Thirteen Electric Companies</u>
1.	Discounted Cash Flow Model (DCF) (1)	8.78%
2.	Risk Premium Model (RPM) (2)	10.95%
3.	Capital Asset Pricing Model (CAPM) (3)	12.53%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	<u>12.24%</u>
5.	Indicated Range of Common Equity Cost Rates before Adjustment for Company-Specific Risk	9.65% - 11.65%
6.	Size Risk Adjustment (5)	0.05%
7.	Credit Risk Adjustment (6)	-0.13%
8.	Flotation Cost Adjustment (7)	<u>0.12%</u>
9.	Indicated Range of Common Equity Cost Rates after Adjustment	<u><u>9.69% - 11.69%</u></u>
10.	Recommended Common Equity Cost Rate	<u><u>10.20%</u></u>

- Notes: (1) From pages 1 and 2 of Exhibit_(DWD-1), Schedule 5.
 (2) From page 1 of Exhibit_(DWD-1), Schedule 6.
 (3) From page 1 of Exhibit_(DWD-1), Schedule 7.
 (4) From page 1 of Exhibit_(DWD-1), Schedule 9.
 (5) Adjustment to reflect the Company's greater business risk due to its smaller size relative to the Utility Proxy Group as detailed in Mr. D'Ascendis' direct testimony.
 (6) Company-specific risk adjustment to reflect NSP Minnesota's greater credit risk compared to the Utility Proxy Group as detailed in Mr. D'Ascendis' direct testimony.
 (7) From page 1 of Exhibit_(DWD-1), Schedule 12.

Northern States Power Company
CAPITALIZATION AND FINANCIAL STATISTICS (1)
2015 - 2020, Inclusive

	2020	2019	2018	2017	2016	
	(MILLIONS OF DOLLARS)					
CAPITALIZATION STATISTICS						
AMOUNT OF CAPITAL EMPLOYED						
TOTAL PERMANENT CAPITAL	\$ 12,673.000	\$ 11,603.100	\$ 10,510.300	\$ 10,408.588	\$ 10,198.734	
SHORT-TERM DEBT	179.000	30.000	150.000	20.000	85.000	
TOTAL-CAPITAL EMPLOYED	<u>\$ 12,852.000</u>	<u>\$ 11,633.100</u>	<u>\$ 10,660.300</u>	<u>\$ 10,428.588</u>	<u>\$ 10,283.734</u>	
INDICATED AVERAGE CAPITAL COST RATES (2)						
TOTAL DEBT	4.28 %	4.38 %	4.51 %	4.61 %	4.69 %	
CAPITAL STRUCTURE RATIOS						
BASED ON TOTAL PERMANENT CAPITAL:						5 YEAR AVERAGE
LONG-TERM DEBT	46.59 %	47.58 %	46.97 %	47.39 %	47.49 %	47.20 %
PREFERRED STOCK	-	-	-	-	-	-
COMMON EQUITY	53.41	52.42	53.03	52.61	52.51	52.80
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
BASED ON TOTAL CAPITAL:						
TOTAL DEBT, INCLUDING SHORT-TERM	47.33 %	47.72 %	47.72 %	47.49 %	47.92 %	47.64 %
PREFERRED STOCK	-	-	-	-	-	-
COMMON EQUITY	52.67	52.28	52.28	52.51	52.08	52.36
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
DIVIDEND PAYOUT RATIO	69.04 %	85.99 %	92.69 %	103.36 %	81.00 %	86.42 %
RATE OF RETURN ON AVERAGE BOOK COMMON EQUITY	9.20 %	9.31 %	8.91 %	9.05 %	9.29 %	9.15 %
TOTAL DEBT / EBITDA (3)	3.69 x	3.46 x	3.45 x	3.09 x	3.23 x	3.38 x
FUNDS FROM OPERATIONS / TOTAL DEBT (4)	15.52 %	17.70 %	31.94 %	22.53 %	25.64 %	22.67 %
TOTAL DEBT / TOTAL CAPITAL	47.33 %	47.72 %	47.72 %	47.49 %	47.92 %	47.64 %

Notes:

- (1) All capitalization and financial statistics for the group are the arithmetic average of the achieved results for each individual company in the group, and are based upon financial statements as originally reported in each year.
- (2) Computed by relating actual total debt interest or preferred stock dividends booked to average of beginning and ending total debt or preferred stock reported to be outstanding.
- (3) Total debt relative to EBITDA (Earnings before Interest, Income Taxes, Depreciation and Amortization).
- (4) Funds from operations (sum of net income, depreciation, amortization, net deferred income tax and investment tax credits, less total AFUDC) plus interest charges as a percentage of total debt.

Source of Information: Company audited financial statements

Proxy Group of Thirteen Electric Companies
 CAPITALIZATION AND FINANCIAL STATISTICS (1)
 2016 - 2020, Inclusive

	2020	2019	2018	2017	2016	
	(MILLIONS OF DOLLARS)					
<u>CAPITALIZATION STATISTICS</u>						
<u>AMOUNT OF CAPITAL EMPLOYED</u>						
TOTAL PERMANENT CAPITAL	\$23,540.207	\$21,851.876	\$20,011.952	\$18,298.378	\$18,058.785	
SHORT-TERM DEBT	\$751.487	\$644.770	\$732.653	\$700.859	\$563.885	
TOTAL CAPITAL EMPLOYED	<u>\$24,291.694</u>	<u>\$22,496.646</u>	<u>\$20,744.605</u>	<u>\$18,999.237</u>	<u>\$18,622.670</u>	
<u>INDICATED AVERAGE CAPITAL COST RATES (2)</u>						
TOTAL DEBT	4.15 %	4.39 %	4.56 %	4.52 %	4.79 %	
PREFERRED STOCK	5.53	5.17	5.27	5.33	5.47	
<u>CAPITAL STRUCTURE RATIOS</u>						
BASED ON TOTAL PERMANENT CAPITAL:						
LONG-TERM DEBT	53.56 %	51.98 %	51.08 %	50.54 %	49.79 %	51.39 %
PREFERRED STOCK	0.76	0.88	0.88	0.93	1.05	0.90
COMMON EQUITY	45.69	47.14	48.04	48.53	49.17	47.71
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
BASED ON TOTAL CAPITAL:						
TOTAL DEBT, INCLUDING SHORT-TERM	54.79 %	52.91 %	52.27 %	52.46 %	51.36 %	52.76 %
PREFERRED STOCK	0.72	0.86	0.85	0.87	1.00	0.86
COMMON EQUITY	44.49	46.23	46.88	46.67	47.64	46.38
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>FINANCIAL STATISTICS</u>						
<u>FINANCIAL RATIOS - MARKET BASED</u>						
EARNINGS / PRICE RATIO	4.06 %	4.98 %	4.81 %	4.75 %	4.58 %	4.64 %
MARKET / AVERAGE BOOK RATIO	188.40	202.95	195.30	205.25	169.89	192.36
DIVIDEND YIELD	3.48	3.18	3.51	3.28	3.52	3.39
DIVIDEND PAYOUT RATIO	63.61	63.15	47.46	74.57	50.24	59.81
<u>RATE OF RETURN ON AVERAGE BOOK COMMON EQUITY</u>	7.83 %	10.01 %	8.84 %	9.10 %	8.25 %	8.81 %
<u>TOTAL DEBT / EBITDA (3)</u>	5.85 x	4.49 x	5.06 x	4.08 x	5.34 x	4.96 x
<u>FUNDS FROM OPERATIONS / TOTAL DEBT (4)</u>	13.09 %	14.23 %	18.49 %	18.73 %	18.60 %	16.63 %
<u>TOTAL DEBT / TOTAL CAPITAL</u>	54.79 %	52.91 %	52.27 %	52.46 %	51.36 %	52.76 %

Notes:

- (1) All capitalization and financial statistics for the group are the arithmetic average of the achieved results for each individual company in the group, and are based upon financial statements as originally reported in each year.
- (2) Computed by relating actual total debt interest or preferred stock dividends booked to average of beginning and ending total debt or preferred stock reported to be outstanding.
- (3) Total debt relative to EBITDA (Earnings before Interest, Income Taxes, Depreciation and Amortization).
- (4) Funds from operations (sum of net income, depreciation, amortization, net deferred income tax and investment tax credits, less total AFUDC) plus interest charges as a percentage of total debt.

Source of Information: Company Annual Forms 10-K

Capital Structure Based upon Total Permanent Capital for the
Proxy Group of Thirteen Electric Companies
2016 - 2020, Inclusive

	<u>2020</u>	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>2016</u>	<u>5 YEAR</u> <u>AVERAGE</u>
<u>Pinnacle West Capital Corporation</u>						
Long-Term Debt	52.11 %	50.39 %	49.23 %	48.22 %	45.43 %	49.08 %
Short-Term Debt	1.40	1.03	0.73	0.95	1.94	1.21
Preferred Stock	-	-	-	-	-	0.00
Common Equity	46.49	48.58	50.04	50.83	52.63	49.71
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Portland General Electric Company</u>						
Long-Term Debt	52.44 %	50.06 %	49.72 %	50.10 %	50.06 %	50.48 %
Short-Term Debt	2.58	-	-	-	-	0.52
Preferred Stock	-	-	-	-	-	0.00
Common Equity	44.98	49.94	50.28	49.90	49.94	49.01
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.01 %</u>
<u>Xcel Energy, Inc.</u>						
Long-Term Debt	56.96 %	56.69 %	55.00 %	54.97 %	55.87 %	55.90 %
Short-Term Debt	1.66	1.86	3.52	2.99	1.52	2.31
Preferred Stock	-	-	-	-	-	0.00
Common Equity	41.38	41.45	41.48	42.04	42.61	41.79
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Proxy Group of Thirteen Electric Companies</u>						
Long-Term Debt	52.12 %	50.84 %	49.60 %	48.47 %	48.58 %	49.90 %
Short-Term Debt	2.64	1.99	2.48	3.84	2.92	2.79
Preferred Stock	0.74	0.88	0.87	0.89	1.02	0.87
Common Equity	44.50	46.29	47.05	46.80	47.48	46.44
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>

Source of Information
 Annual Forms 10-K

Northern States Power Company
 Operating Subsidiary Company Capital Structures of the
Proxy Group of Thirteen Electric Companies

2020					
Company Name	Parent Company Ticker	Common Equity	Long-Term Debt	Short-Term Debt	Total Capital
Ameren Illinois Company	AEE	54.98%	44.81%	0.22%	100.00%
Central Illinois Light Company	AEE	54.98%	44.81%	0.22%	100.00%
Illinois Power Company	AEE	54.98%	44.81%	0.22%	100.00%
Union Electric Company	AEE	54.98%	44.81%	0.22%	100.00%
Duke Energy Carolinas, LLC	DUK	50.60%	47.45%	1.95%	100.00%
Duke Energy Florida, LLC	DUK	50.60%	47.45%	1.95%	100.00%
Duke Energy Indiana, LLC	DUK	50.60%	47.45%	1.95%	100.00%
Duke Energy Kentucky, Inc.	DUK	50.60%	47.45%	1.95%	100.00%
Duke Energy Ohio, Inc.	DUK	50.60%	47.45%	1.95%	100.00%
Duke Energy Progress, LLC	DUK	50.60%	47.45%	1.95%	100.00%
Florida Progress Corporation	DUK	50.60%	47.45%	1.95%	100.00%
Piedmont Natural Gas Company, Inc.	DUK	50.60%	47.45%	1.95%	100.00%
Progress Energy, Inc.	DUK	50.60%	47.45%	1.95%	100.00%
Southern California Edison Company	EIX	41.41%	52.23%	6.36%	100.00%
Entergy Arkansas, LLC	ETR	44.81%	55.19%	0.00%	100.00%
Entergy Gulf States Louisiana, L.L.C.	ETR	44.81%	55.19%	0.00%	100.00%
Entergy Louisiana, LLC	ETR	44.81%	55.19%	0.00%	100.00%
Entergy Mississippi, LLC	ETR	44.81%	55.19%	0.00%	100.00%
Entergy New Orleans, LLC	ETR	44.81%	55.19%	0.00%	100.00%
Entergy Texas, Inc.	ETR	44.81%	55.19%	0.00%	100.00%
Evergy Kansas Central, Inc.	EVRG	50.24%	47.07%	2.69%	100.00%
Evergy Kansas South, Inc.	EVRG	50.24%	47.07%	2.69%	100.00%
Evergy Metro, Inc.	EVRG	50.24%	47.07%	2.69%	100.00%
Evergy Missouri West, Inc.	EVRG	50.24%	47.07%	2.69%	100.00%
Idaho Power Company	IDA	54.16%	45.84%	0.00%	100.00%
Interstate Power and Light Company	LNT	51.52%	48.48%	0.00%	100.00%
Wisconsin Power and Light Company	LNT	51.52%	48.48%	0.00%	100.00%
NorthWestern Corporation	NWE	46.08%	51.70%	2.22%	100.00%
Oklahoma Gas and Electric Company	OGE	52.93%	47.07%	0.00%	100.00%
Otter Tail Power Company	OTTR	NA	NA	NA	NA
Arizona Public Service Company	PNW	49.89%	50.11%	0.00%	100.00%
Portland General Electric Company	POR	43.56%	53.93%	2.50%	100.00%
Northern States Power Company	XEL	50.59%	48.07%	1.34%	100.00%
Northern States Power Company	XEL	50.59%	48.07%	1.34%	100.00%
Public Service Company of Colorado	XEL	50.59%	48.07%	1.34%	100.00%
Southwestern Public Service Company	XEL	50.59%	48.07%	1.34%	100.00%
	Mean	<u>51.95%</u>	<u>46.64%</u>	<u>1.41%</u>	<u>100.00%</u>

Source: S&P Global Market Intelligence

Northern States Power Company
 Cost of Long-Term Debt Comparison

Issue	Initial Offering	Date of Offering	Date of Maturity	Years to Maturity	Coupon	Net Issuance Costs	Net Proceeds	Annual Interest Expense	Annual Net Amortization	Total Expense	Yield	Bloomberg Fair Value Curve		
												BFV Term	Utility A-Rated	Utility BBB-Rated
Series due July 1, 2025 (FMB)	\$ 250,000	7/7/1995	7/1/2025	30	7.125%	\$ 417	\$ 249,583	\$ 17,813	\$ 141	\$ 17,953	7.19%	30	7.42%	7.50%
Series due March 1, 2028 (FMB)	\$ 150,000	3/11/1998	3/1/2028	30	6.500%	\$ 607	\$ 149,393	\$ 9,750	\$ 108	\$ 9,858	6.60%	30	6.86%	7.07%
Series due July 15, 2035 (FMB)	\$ 250,000	7/21/2005	7/15/2035	30	5.250%	\$ 1,525	\$ 248,475	\$ 13,125	\$ 117	\$ 13,242	5.33%	30	5.18%	5.55%
Series due June 1, 2036 (FMB)	\$ 400,000	5/25/2006	6/1/2036	30	6.250%	\$ (4,657)	\$ 404,657	\$ 25,000	\$ (335)	\$ 24,665	6.10%	30	6.27%	6.59%
Series due July 1, 2037 (FMB)	\$ 350,000	6/1/2007	7/1/2037	30	6.200%	\$ 3,152	\$ 346,848	\$ 21,700	\$ 211	\$ 21,911	6.32%	30	6.09%	6.24%
Series due November 1, 2039 (FMB)	\$ 300,000	11/17/2009	11/1/2039	30	5.350%	\$ 4,579	\$ 295,421	\$ 16,050	\$ 265	\$ 16,315	5.52%	30	5.57%	6.23%
Series due August 15, 2040 (FMB)	\$ 250,000	8/11/2010	8/15/2040	30	4.850%	\$ 2,246	\$ 247,754	\$ 12,125	\$ 124	\$ 12,249	4.94%	30	5.25%	5.76%
Series due August 15, 2022 (FMB) (2)	\$ 100,000	8/13/2012	8/15/2022	10	2.150%	\$ 60	\$ 99,940	\$ 2,150	\$ 220	\$ 2,370	2.37%	10	2.78%	3.53%
Series due August 15, 2042 (FMB)	\$ 500,000	8/13/2012	8/15/2042	30	3.400%	\$ 36,826	\$ 463,174	\$ 17,000	\$ 1,833	\$ 18,833	4.07%	30	3.74%	4.19%
Series due May 15, 2023 (FMB)	\$ 400,000	5/20/2013	5/15/2023	10	2.600%	\$ 436	\$ 399,564	\$ 10,400	\$ 527	\$ 10,927	2.73%	10	2.81%	3.38%
Series due May 15, 2044 (FMB)	\$ 300,000	5/13/2014	5/15/2044	30	4.125%	\$ 3,417	\$ 296,583	\$ 12,375	\$ 156	\$ 12,531	4.23%	30	4.35%	4.72%
Series due Aug 15, 2045 (FMB)	\$ 300,000	8/11/2015	8/15/2045	30	4.000%	\$ 6,767	\$ 293,233	\$ 12,000	\$ 293	\$ 12,293	4.19%	30	4.37%	4.77%
Series due May 15, 2046 (FMB)	\$ 350,000	5/31/2016	5/15/2046	30	3.600%	\$ 5,967	\$ 344,033	\$ 12,600	\$ 250	\$ 12,850	3.74%	30	3.95%	4.42%
Series due Sep 15, 2047 (FMB)	\$ 600,000	9/13/2017	9/15/2047	30	3.700%	\$ 19,421	\$ 580,579	\$ 22,200	\$ 771	\$ 22,971	3.96%	30	3.85%	4.17%
Series due Mar 1, 2050 (FMB)	\$ 600,000	9/10/2019	3/1/2050	30	2.900%	\$ 18,408	\$ 581,592	\$ 17,400	\$ 666	\$ 18,066	3.11%	30	3.29%	3.66%
Series due Jun 1, 2051 (FMB)	\$ 700,000	6/15/2020	6/1/2051	31	2.600%	\$ 21,418	\$ 678,582	\$ 18,200	\$ 741	\$ 18,941	2.79%	31	3.12%	3.55%
Series due Apr 1, 2031 (FMB)	\$ 425,000	3/30/2021	4/1/2031	10	2.250%	\$ 5,885	\$ 419,115	\$ 9,563	\$ 675	\$ 10,238	2.44%	10	2.33%	2.54%
Series due Apr 1, 2052 (FMB)	\$ 425,000	3/30/2021	4/1/2052	31	3.200%	\$ 7,203	\$ 417,797	\$ 13,600	\$ 242	\$ 13,842	3.31%	31	3.36%	3.66%
Series due May 1, 2052 (FMB) (1)	\$ 366,667	5/1/2022	5/1/2052	30	3.300%	\$ 5,431	\$ 361,236	\$ 12,100	\$ 184	\$ 12,284	3.40%	30	N/A	N/A
TOTAL	\$ 6,650,000				Weighted Averages:						4.13%		4.20%	4.58%

Notes:
 Sources: Company provided data and Bloomberg Professional.
 Fair Value Curve yields are 30-day averages from Bloomberg Professional.

Northern States Power Company
 Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the
Proxy Group of Thirteen Electric Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Thirteen Electric Companies	Average Dividend Yield (1)	Value Line Projected Five Year Growth in EPS (2)	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (3)	Adjusted Dividend Yield (4)	Indicated Common Equity Cost Rate (5)
Alliant Energy Corporation	2.74 %	5.50 %	5.60 %	5.10 %	5.40 %	2.81 %	8.21 %
Ameren Corporation	2.59	6.50	7.30	7.70	7.17	2.68	9.85
Duke Energy Corporation	3.81	7.00	5.30	5.45	5.92	3.92	9.84
Edison International	4.65	NMF	3.40	3.40	3.40	4.73	8.13
Energy Corporation	3.59	3.00	1.40	3.85	2.75	3.64	6.39
Energy, Inc.	3.30	8.00	5.80	5.70	6.50	3.41	9.91
IDACORP, Inc.	2.76	4.00	3.90	3.20	3.70	2.81	6.51
NorthWestern Corporation	3.97	3.00	4.80	4.50	4.10	4.05	8.15
OGE Energy Corporation	4.66	4.00	4.50	3.90	4.13	4.76	8.89
Otter Tail Corporation	3.07	7.00	4.70	9.00	6.90	3.18	10.08
Pinnacle West Capital Corporation	4.03	5.00	5.00	0.10	3.37	4.10	7.47
Portland General Electric Company	3.52	8.50	8.60	7.10	8.07	3.66	11.73
Xcel Energy, Inc.	2.68	6.00	6.10	6.30	6.13	2.76	8.89
						Average	<u>8.77 %</u>
						Median	<u>8.89 %</u>
						Average of Mean and Median	<u>8.83 %</u>
						Excl. 7% or less:	<u>9.05 %</u>

- Notes:
- (1) Indicated dividend at 08/31/2021 divided by the average closing price of the last 60 trading days ending 08/31/2021 for each company.
 - (2) From pages 3 through 15 of this Schedule.
 - (3) Average of columns 2 through 4 excluding negative growth rates.
 - (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 5) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for Alliant Energy Corporation, $2.74\% \times (1 + (1/2 \times 5.40\%)) = 2.81\%$.
 - (5) Column 5 + Column 6.

Source of Information:
 Value Line Investment Survey
 www.zacks.com Downloaded on 08/31/2021
 www.yahoo.com Downloaded on 08/31/2021

Northern States Power Company
 Indicated Common Equity Cost Rate Using the Two Growth Discounted Cash Flow Model for the
 Proxy Group of Thirteen Electric Companies

	[1]	[2]	[3]	[4]	[5]	[7]	[8]	[9]	[10]
Proxy Group of Thirteen Electric Companies	Stock Price	Annualized Dividend	Dividend Yield (1)	Value Line Projected Five Year Growth in EPS (2)	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (3)	Adjusted Dividend Yield (4)	Indicated Common Equity Cost Rate (5)
Alliant Energy Corporation	\$ 60.79	\$ 1.61	2.65 %	5.50 %	5.60 %	5.10 %	5.40 %	2.72 %	8.12 %
Ameren Corporation	87.72	2.20	2.51	6.50	7.30	7.70	7.17	2.60	8.01 (6)
Duke Energy Corporation	104.66	3.94	3.76	7.00	5.30	5.45	5.92	3.87	9.79
Edison International	57.84	2.65	4.58	NMF	3.40	3.40	3.40	4.66	9.59 (6)
Energy Corporation	110.61	3.80	3.44	3.00	1.40	3.85	2.75	3.49	8.37 (6)
Energy, Inc.	68.45	2.14	3.13	8.00	5.80	5.70	6.50	3.23	9.73
IDACORP, Inc.	105.35	2.84	2.70	4.00	3.90	3.20	3.70	2.75	6.45
NorthWestern Corporation	63.60	2.48	3.90	3.00	4.80	4.50	4.10	3.98	8.08
OGE Energy Corporation	35.41	1.61	4.55	4.00	4.50	3.90	4.13	4.64	8.77
Otter Tail Corporation	54.87	1.56	2.84	7.00	4.70	9.00	6.90	2.94	8.36 (6)
Pinnacle West Capital Corporation	76.90	3.32	4.32	5.00	5.00	0.10	3.37	4.39	9.32 (6)
Portland General Electric Company	51.35	1.72	3.35	8.50	8.60	7.10	8.07	3.49	9.13 (6)
Xcel Energy, Inc.	68.75	1.83	2.66	6.00	6.10	6.30	6.13	2.74	8.87
						Average	5.20	Average	8.66 %
						1 Standard Deviation Below Mean	3.55	Median	8.77 %
						1 Standard Deviation Above Mean	6.84		
								Average of Mean and Median	8.72 %
								Excl. 7% or less:	8.84 %

NA= Not Available
 NMF= Not Meaningful Figure

Notes:

- (1) Indicated dividend at 08/31/2021 divided by the average closing price of the last 60 trading days ending 08/31/2021 for each
- (2) From pages 3 through 15 of this Schedule.
- (3) Average of columns 4 through 7 excluding negative growth rates.
- (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 8) x column 3 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for Alliant Energy Corporation, $2.65\% \times (1 + (1/2 \times 5.40\%)) = 2.72\%$.
- (5) Column 8 + column 9.
- (6) The Two Growth Method was applied to Companies with short-term EPS growth rates greater than one standard deviation from the overall Utility Proxy Group mean growth rate. The mean of all Utility Proxy Group Companies with growth rates are within one standard deviation of the overall mean growth rate was applied as the long-term growth rate for these Companies.

Source of Information:

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

ALLIANT ENERGY NDQ-LNT		RECENT PRICE 57.15		P/E RATIO 22.0 (Trailing: 23.6; Median: 19.0)		RELATIVE P/E RATIO 1.03		DIV/D YLD 2.8%		VALUE LINE			
TIMELINESS 3 Raised 4/30/21	High: 18.8 22.2 23.8 27.1 34.9 35.4 41.0 45.6 46.6 55.4 60.3 58.5	Low: 14.6 17.0 20.9 21.9 25.0 27.1 30.4 36.6 36.8 40.8 37.7 46.0										Target Price Range 2024 2025 2026	
SAFETY 2 Raised 9/28/07	LEGENDS 0.90 x Dividends p sh divided by Interest Rate ... Relative Price Strength 2-for-1 split 5/16 Options: Yes Shaded area indicates recession												
TECHNICAL 3 Raised 6/4/21													
BETA .85 (1.00 = Market)													
18-Month Target Price Range													
Low-High Midpoint (% to Mid)													
\$42-\$86 \$64 (10%)													
2024-26 PROJECTIONS													
High Price 60	Gain (+5%)	Ann'l Total Return 4%											
Low Price 45	Gain (-20%)	Ann'l Total Return -2%											
Institutional Decisions													
3Q2020 4Q2020 1Q2021	Percent shares traded												
to Buy 249 261 249	16												
to Sell 219 241 253	8												
Hid's(000) 182149 181812 188898													
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.													
CAPITAL STRUCTURE as of 3/31/21													
Total Debt \$7115.0 mill. Due in 5 Yrs \$1950.0 mill. LT Debt \$6471.0 mill. LT Interest \$270.0 mill. (LT interest earned: 3.1x)													
Pension Assets-12/20 \$984.0 mill. Oblig. \$1351.0 mill.													
Pfd Stock \$400.0 mill. Pfd Div'd \$10.2 mill. 16,000,000 shs.													
Common Stock 250,134,552 shs.													
MARKET CAP: \$14.3 billion (Large Cap)													
ELECTRIC OPERATING STATISTICS													
2018 2019 2020													
% Change Retail Sales (KWH) +2.0 -2.2 +2.3													
Avg. Indust. Use (MWH) 11830 11448 11134													
Avg. Indust. Revs. per KWH (c) 7.25 6.98 7.55													
Capacity at Peak (Mw) 5459 5626 5496													
Peak Load, Summer (Mw) 5459 5626 5496													
Annual Load Factor (%) NA NA NA													
% Change Customers (yr-end) +4 +6 +6													
Fixed Charge Cov. (%) 322 324 342													
ANNUAL RATES													
of change (per sh) 10 Yrs. Past 5 Yrs. Past Est'd '18-'20 to '24-'26													
Revenues -5.5% .5% 1.0%													
"Cash Flow" 5.5% 4.5% 4.0%													
Earnings 6.0% 6.0% 5.5%													
Dividends 7.0% 7.0% 6.0%													
Book Value 4.5% 5.5% 6.0%													
QUARTERLY REVENUES (\$ mill.)													
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year								
2018	916.3	816.1	928.6	873.5	3534.5								
2019	987.2	790.2	990.2	880.1	3647.7								
2020	915.7	763.1	920.0	817.2	3416.0								
2021	901.0	800	975	949	3625								
2022	980	835	1015	970	3800								
EARNINGS PER SHARE^A													
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year								
2018	.52	.43	.87	.37	2.19								
2019	.53	.40	.94	.46	2.33								
2020	.72	.54	.94	.26	2.47								
2021	.68	.53	.95	.44	2.60								
2022	.66	.56	1.05	.48	2.75								
QUARTERLY DIVIDENDS PAID^B													
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year								
2017	.315	.315	.315	.315	1.26								
2018	.335	.335	.335	.335	1.34								
2019	.355	.355	.355	.355	1.42								
2020	.38	.38	.38	.38	1.52								
2021	.403	.403	.403	.403	1.59								
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. Electric revenue by state: WI, 42%; IA, 57%; MN, 1%. Electric revenue: residential, 37%; commercial, 24%; industrial, 29%; wholesale, 7%; other, 3%. Fuel sources, 2020: coal, 23%; gas, 34%; other, 43%. Fuel costs: 41% of revs. 2020 depreciation rate: 6.4%. Estimated plant age: 18 years. Has approximately 3,375 employees. Chairman & Chief Executive Officer: John O. Larsen. Incorporated: Wisconsin. Address: 4902 N. Biltmore Lane, Madison, Wisconsin 53718. Telephone: 608-458-3311. Internet: www.alliantenergy.com.													
Earnings at Alliant Energy are likely to rise 5%-6% in 2021 and 2022. As a reminder, the utility has reached an agreement in Wisconsin to hold rates steady in 2021 by using excess deferred tax benefits and fuel savings to offset a higher revenue requirement. The agreement with the Public Service Commission of Wisconsin will enable Alliant to earn a respectable return on investment without increasing base rates for the second-consecutive year. In Iowa, the company does not have any rate cases pending and does not intend to submit one for a while. This was made possible through an agreement with the Iowa Utilities Board and other stakeholders on a renewable energy rider. The program allows LNT to recover costs associated with various renewable energy projects without having to formally pursue a rate increase. Alliant awaits a rate order in Wisconsin. The utility reached a settlement calling for annual base rate increases of \$70 million and \$15 million for WPL's retail electric and gas customers, respectively, covering the 2022/2023 period. Key drivers of the proposed rate hike include lower excess deferred income tax benefits and new investments in wind and solar power. If approved by the Public Service Commission of Wisconsin, the allowed ROE will be 10% and the common-equity ratio will be 54%. A ruling is expected later this year. The company is expanding its clean energy portfolio. In Wisconsin, Alliant filed a request with the PSCW to construct up to 414 mw of new solar generation by the end of 2023. The proposal builds on the 675 mw of solar generation that the utility has already committed to in Wisconsin, bringing the total amount of new solar to 1,089 mw by 2023. The cost of both projects is expected to be around \$940 million. In Iowa, Alliant plans to construct 400 mw of additional solar power by 2023, building on the 1,300 mw of wind generation that it already has in that state. This neutrally ranked stock does not stand out at the moment. With the quotation near the high end of our 2024-2026 Target Price Range, long-term total return potential is low compared to the Value Line median. In addition, the dividend yield (2.8%) is below average for an electric utility. <i>Daniel Henigson, CFA June 11, 2021</i>													
(A) Diluted EPS. May not sum due to changes in share count. Excl. nonrecr. gains (losses): '11, (1c); '12, (8c). Next earnings rpt. due early August. (B) Dividends historically paid in mid-Feb., May, Aug., and Nov. ■ Div'd reinvest. plan avail. † Shareholder invest. plan avail. (C) Incl. deferred chgs. In '20: \$73.0 mill., \$0.29/sh. (D) In millions, adjusted for split. (E) Rate base: Orig. cost. Rates all'd on com. eq. in IA in '20: 10.0%; in WI in '20 Regul. Clim: WI, Above Avg.; IA, Avg.					Company's Financial Strength A Stock's Price Stability 95 Price Growth Persistence 75 Earnings Predictability 95								

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AMEREN NYSE-AEE					RECENT PRICE	P/E RATIO					RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE			
TIMELINESS 2 Raised 5/28/21 SAFETY 2 Raised 6/20/14 TECHNICAL 3 Raised 5/7/21 BETA .80 (1.00 = Market)					84.20	22.2 (Trailing: 22.0; Median: 18.0)					1.04	2.7%	Target Price Range 2024 2025 2026			
18-Month Target Price Range Low-High Midpoint (% to Mid) \$63-\$129 \$96 (15%)					29.9 23.1	34.1 25.5	35.3 28.4	37.3 30.6	48.1 35.2	46.8 37.3	54.1 41.5	64.9 51.4	70.9 51.9	80.9 63.1	87.7 58.7	86.8 69.8
2024-26 PROJECTIONS Price Gain Ann'l Total High 100 (+20%) 7% Low 75 (-10%) 1%															% TOT. RETURN 5/21	
Institutional Decisions 3Q2020 4Q2020 1Q2021 to Buy 242 266 249 to Sell 255 250 269 Hld's(000) 188020 196751 194499					Percent shares traded: 30, 20, 10										1 yr. 15.0 3 yr. 53.2 5 yr. 95.3	
CAPITAL STRUCTURE as of 3/31/21 Total Debt \$12424 mill. Due in 5 Yrs \$2792 mill. LT Debt \$11527 mill. LT Interest \$439 mill. (LT interest earned: 3.7x) Leases, Uncapitalized Annual rentals \$9 mill. Pension Assets-12/20 \$5510 mill. Oblig \$5510 mill. Pfd Stock \$142 mill. Pfd Div'd \$6 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-\$104.30/sh.					2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022										© VALUE LINE PUB. LLC 24-26 Revenues per sh 25.75 "Cash Flow" per sh 10.75 Earnings per sh ^A 5.00 Div'd Decl'd per sh ^B 2.90 Cap'l Spending per sh 12.75 Book Value per sh ^C 47.75 Common Shs Outst'g ^D 280.00 Avg Ann'l P/E Ratio 17.0 Relative P/E Ratio .90 Avg Ann'l Div'd Yield 3.4%	
ELECTRIC OPERATING STATISTICS 2018 2019 2020 % Change Retail Sales (KWH) +5.6 -3.5 -5.6 Avg. Indust. Use (MWH) NA NA NA Avg. Indust. Rev. per KWH (c) 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) NA NA NA					2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022										Revenues (\$mill) 7200 Net Profit (\$mill) 1390 Income Tax Rate 10.0% AFUDC % to Net Profit 4.0% Long-Term Debt Ratio 50.5% Common Equity Ratio 49.0% Total Capital (\$mill) 27200 Net Plant (\$mill) 36700 Return on Total Cap'l 6.0% Return on Shr. Equity 10.5% Return on Com Equity ^E 10.5% Retained to Com Eq 4.5% All Div's to Net Prof 58%	
ANNUAL RATES of change (per sh) Revenues -3.0% "Cash Flow" 2.5% Earnings 2.0% Dividends .5% Book Value - .5%					2018 2019 2020 Past 10 Yrs. +5.6 Past 5 Yrs. -3.5 Est'd '18-'20 to '24-'26 2.0% -5.0% 5.5% 6.5% 7.0% 6.5%										Fixed Charge Cov. (%) 313 307 291	
QUARTERLY REVENUES (\$ mill.) Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year					2018 2019 2020 2021 2022 1585 1563 1724 1419 6291.0 1556 1379 1659 1316 5910.0 1440 1398 1628 1328 5794.0 1566 1450 1700 1384 6100 1650 1500 1750 1450 6350										Earnings per share (2021) 5.00	
EARNINGS PER SHARE ^A Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year					2018 .62 .97 1.45 .28 3.32 2019 .78 .72 1.47 .38 3.35 2020 .59 .98 1.47 .46 3.50 2021 .91 .75 1.70 .44 3.80 2022 .85 .85 1.85 .50 4.05										Return on Equity (2021) 10.5%	
QUARTERLY DIVIDENDS PAID ^B Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year					2017 .44 .44 .44 .4575 1.78 2018 .4575 .4575 .4575 .475 1.85 2019 .475 .475 .475 .495 1.92 2020 .495 .495 .495 .515 2.00 2021 .55										Dividend Yield (2021) 3.4%	
MARKET CAP: \$22 billion (Large Cap) Generating sources: coal, 67%; nuclear, 19%; hydro & other, 6%; purchased, 8%. Fuel costs: 22% of revenues. '20 reported deprec. rates: 3%-4%. Has 9,200 employees. Chairman, President & CEO: Warner L. Baxter. Inc.: Missouri. Address: One Ameren Plaza, 1901 Chouteau Ave., P.O. Box 66149, St. Louis, Missouri 63166-6149. Tel.: 314-621-3222. Internet: www.ameren.com.					BUSINESS: Ameren Corporation is a holding company formed through the merger of Union Electric and CIPSCO. Has 1.2 million electric and 127,000 gas customers in Missouri; 1.2 million electric and 813,000 gas customers in Illinois. Discontinued unregulated power-generation operation in '13. Electric revenue breakdown: residential, 43%; commercial, 32%; industrial, 8%; other, 17%.										Paul E. Debbas, CFA June 11, 2021	
Ameren filed electric and gas rate cases in Missouri. The utility is seeking an electric increase of \$299 million, based on a 9.9% return on equity and a 51.9% common-equity ratio. The gas request is \$9 million, based on a 9.8% ROE and the same common-equity ratio. Among other things, Ameren is seeking to place wind capacity in the rate base. Decisions are expected by February, with new tariffs taking effect in March.					Earnings will likely advance solidly in 2021. First-quarter profits soared, thanks in part to an electric rate hike in Missouri that took effect in April of 2020 and a gas tariff increase that took effect in Illinois in January of 2021. Ameren's electric operations in Illinois are benefiting from a higher allowed ROE. We have raised our share-earnings estimate by a dime, to \$3.80. This is within the company's targeted range of \$3.65-\$3.85 a share.										Further profit growth is likely in 2022. Ameren should benefit from rate relief in Missouri. Ongoing investment in the utility's electric transmission system is another source of income. Our estimate of \$4.05 a share, which we boosted by \$0.10, would produce a 7% increase. This is within management's goal of 6%-8% annually. However . . .	
Company's Financial Strength A Stock's Price Stability 95 Price Growth Persistence 80 Earnings Predictability 95					Ameren stock is timely, but expensively priced. The dividend yield is below the utility mean. The recent quotation is within our 2024-2026 Target Price Range, so total return prospects over that time frame are unimpressive.										To subscribe call 1-800-VALUELINE	

(A) Diluted EPS, Excl. nonrec. gain (losses): '05: (11c); '10: (\$2.19); '11: (.32c); '12: (\$6.42); '17: (63c); gain (loss) from disc. ops.: '13, (92c); '15, 21c. Next earnings report due mid-2021.
 (B) Div'ds paid late Mar., June, Sept., & Dec. ■ Div'd reinvest. plan avail. (C) Incl. intang. In '20: \$5.97/sh. (D) In mill. (E) Rate base. Orig. cost depr. Rate allowed on com.

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 eq. in MO in '20: elec., none; in '11: gas, none; in IL: electric, varies; in '21: gas, 9.67%; earned on avg. com. eq., '20: 10.2%. Regulatory Climate: MO, Average; IL, Below Average.

Ameren expects the Callaway nuclear plant to return to service in July. The unit has been out of service due to a non-nuclear problem with the generator. The repair and replacement power costs are covered by insurance, so management expects no significant effect on the company's financial results. Still, any extended and unplanned outage at a nuclear facility bears watching.

EVERGY, INC. NYSE-EVRG			RECENT PRICE	P/E RATIO	Trailing: 19.1 Median: NMF	RELATIVE P/E RATIO	DIV/D YLD	VALUE LINE	TARGET PRICE RANGE							
			61.99	17.2		0.81	3.6%		2024	2025	2026					
TIMELINESS	4	Lowered 6/11/21										128				
SAFETY	2	New 9/14/18										96				
TECHNICAL	2	Raised 6/11/21										80				
BETA	.95	(1.00 = Market)										64				
18-Month Target Price Range												48				
Low-High Midpoint (% to Mid)												40				
\$30-\$83 \$57 (-10%)												32				
2024-26 PROJECTIONS												24				
Ann'l Total												16				
High Price	80	Gain (+30%)										12				
Low Price	60	Return (-5%)														
Institutional Decisions																
3Q2020 4Q2020 1Q2021																
to Buy	260	268	268									Percent	36			
to Sell	279	291	255									shares	24			
Hld's(000)	181645	188200	191409									traded	12			
Evergy, Inc. was formed through the merger of Great Plains Energy and Westar Energy in June of 2018. Great Plains Energy holders received .5981 of a share of Evergy for each of their shares, and Westar Energy holders received one share of Evergy for each of their shares. The merger was completed on June 4, 2018. Shares of Evergy began trading on the New York Stock Exchange one day later.			2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	© VALUE LINE PUB. LLC	24-26
CAPITAL STRUCTURE as of 3/31/21																
Total Debt \$11284 mill. Due in 5 Yrs \$4377.0 mill.																
LT Debt \$9090.6 mill. LT Interest \$327.2 mill.																
Incl. \$45.3 mill. finance leases.																
(LT interest earned: 3.2x)																
Leases, Uncapitalized Annual rentals \$18.5 mill.																
Pension Assets-12/20 \$1799.1 mill. Oblig \$2901.1 mill.																
Pfd Stock None																
Common Stock 229,267,502 shs. as of 4/30/21																
MARKET CAP: \$14 billion (Large Cap)																
ELECTRIC OPERATING STATISTICS																
			2018	2019	2020											
% Change Retail Sales (KWH)			NA	NA	-3.9											
Avg. Indust. Use (MWH)			NA	NA	NA											
Avg. Indust. Revs. per KWH (¢)			7.11	7.25	7.14											
Capacity at Peak (Mw)			NA	NA	NA											
Peak Load, Summer (Mw)			NA	NA	NA											
Annual Load Factor (%)			NA	NA	NA											
% Change Customers (yr-end)			NA	NA	NA											
Fixed Charge Cov. (%)			322	305	286											
ANNUAL RATES			Past 10 Yrs.	Past 5 Yrs.	Est'd '18-'20 to '24-'26											
Revenues			--	--	3.5%											
"Cash Flow"			--	--	6.5%											
Earnings			--	--	8.0%											
Dividends			--	--	5.5%											
Book Value			--	--	3.0%											
Cal-endar	QUARTERLY REVENUES (\$ mill.)				Full Year											
	Mar.31	Jun.30	Sep.30	Dec.31												
2018	600.2	893.4	1582.5	1199.8	4275.9											
2019	1216.9	1221.7	1577.6	1131.6	5147.8											
2020	1116.7	1184.7	1517.6	1094.4	4913.4											
2021	1612	1238	1550	1100	5500											
2022	1250	1250	1600	1100	5200											
Cal-endar	EARNINGS PER SHARE A				Full Year											
	Mar.31	Jun.30	Sep.30	Dec.31												
2018	.42	.56	1.32	.07	2.50											
2019	.39	.57	1.56	.28	2.79											
2020	.31	.59	1.60	.22	2.72											
2021	.84	.70	1.75	.31	3.60											
2022	.55	.75	1.90	.35	3.55											
Cal-endar	QUARTERLY DIVIDENDS PAID B				Full Year											
	Mar.31	Jun.30	Sep.30	Dec.31												
2017	--	--	--	--	--											
2018	.40	.40	.46	.475	1.74											
2019	.475	.475	.475	.505	1.93											
2020	.505	.505	.505	.535	2.05											
2021	.535															
BUSINESS: Evergy, Inc. was formed through the merger of Great Plains Energy and Westar Energy in June of 2018. Through its subsidiaries (now doing business under the Evergy name), provides electric service to 1.6 million customers in Kansas and Missouri, including the greater Kansas City area. Electric revenue breakdown: residential, 39%; commercial, 33%; industrial, 12%; wholesale, 5%; other, 11%. Generating sources: coal, 54%; nuclear, 17%; purchased, 29%. Fuel costs: 22% of revenues. '20 reported deprec. rate: 3%. Has 5,100 employees. Chairman: Mark A. Ruelle. President & Chief Executive Officer: David A. Campbell. Incorporated: Missouri. Address: 1200 Main Street, Kansas City, Missouri 64105. Telephone: 816-556-2200. Internet: www.evergy.com.																
Our 2021 earnings estimate for Evergy requires an explanation. First-quarter pretax earnings included \$96.5 million of unusually high profits from the company's small energy-marketing subsidiary, which benefited from a surge in power prices in Texas during a cold spell in February. We had anticipated this, but not to such a large extent. Accordingly, we raised our 2021 earnings estimate by \$0.20 a share, to \$3.60. This is near the upper end of Evergy's targeted range (on a GAAP basis) of \$3.43-\$3.63 a share. Additionally, its utilities incurred a surge in fuel and purchased-power costs of \$340 million. These are passed through to customers, which explains why the top line increased so significantly. Because the first-quarter comparison will be so tough in 2022, we look for a slight earnings decline for the full year, even though Evergy should benefit from higher kilowatt-hour sales as the economy recovers, effective expense control, and investment in its transmission system. The company's capital budget calls for \$3.0 billion of spending on transmission from 2021 through 2025. The company filed integrated re-																
source plans in Missouri and Kansas. These include the retirement of 1,200 megawatts of coal-fired generation and the addition of 3,200 mw of renewable capacity. Evergy wants to issue securitized bonds to recover its undepreciated interest in the coal units that will be closed. Kansas enacted a law permitting securitization, and similar legislation awaits the governor's signature in Missouri. An agreement with Bluescape, an investor group, was completed in April. An affiliate of Bluescape paid \$113 million for 2.27 million common shares and received warrants for the purchase of 3.95 million shares. The chairman of Bluescape, John Wilder (a former utility chief executive officer), was added to Evergy's board of directors. Evergy and Bluescape have a standstill agreement that runs through the 2022 annual meeting. This untimely stock has an average dividend yield, by utility standards. Total return potential is negative for the next 18 months and unimpressive for the 3- to 5-year period. The recent quotation is within our 2024-2026 Target Price Range. Paul E. Debbas, CFA June 11, 2021																

(A) Diluted EPS. '18 EPS don't sum to full-year total due to change in shares. '19 due to rounding. Next earnings report due early Aug. (B) Dividends paid in mid-March, June, September, and December. (C) Dividend reinvestment plan available. (D) Incl. intangibles. In '20: \$4204.8 mill., \$18.54/sh. (E) In millions. (F) Rate base: Original cost depreciated. Rate allowed on common equity in Missouri in '18: none specified; in Kansas in '18: 9.3%. Earned on average common equity, '20: 7.1%. Regulatory Climate: Average.

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

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NORTHWESTERN NDQ-NWE		RECENT PRICE 61.42	P/E RATIO 17.1 (Trailing: 18.6; Median: 17.0)	RELATIVE P/E RATIO 0.86	DIV'D YLD 4.1%	VALUE LINE	
TIMELINESS 3 Raised 6/4/21	High: 30.6 36.6 38.0 47.2 58.7 59.7 63.8 64.5 65.7 76.7 80.5 70.8	Low: 23.8 27.4 33.0 35.1 42.6 48.4 52.2 55.7 50.0 57.3 45.1 53.2					Target Price Range 2024 2025 2026
SAFETY 2 Raised 7/27/18	LEGENDS 0.61 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession						
TECHNICAL 2 Raised 7/23/21							
BETA .95 (1.00 = Market)	18-Month Target Price Range Low-High Midpoint (% to Mid) \$33-\$88 \$61 (0%)						
2024-26 PROJECTIONS High Price 85 Gain (+40%) Ann'l Total Return 12% Low Price 65 Gain (+5%) Return 6%							
Institutional Decisions 3Q2020 4Q2020 1Q2021 to Buy 134 116 114 to Sell 126 135 130 Hld's(000) 47772 47664 47776 Percent shares traded 30 20 10							

2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	© VALUE LINE PUB. LLC 24-26	
32.57	31.49	30.79	35.09	31.72	30.66	30.80	28.76	29.80	25.68	25.21	26.01	26.45	23.81	24.93	23.70	25.25	24.30	Revenues per sh	26.50
4.00	3.62	3.70	4.40	4.62	4.76	5.42	5.18	5.45	5.39	5.92	6.74	6.76	6.96	7.07	6.72	7.30	7.35	"Cash Flow" per sh	8.25
1.71	1.31	1.44	1.77	2.02	2.14	2.53	2.26	2.46	2.99	2.90	3.39	3.34	3.40	3.53	3.06	3.60	3.70	Earnings per sh ^A	4.00
1.00	1.24	1.28	1.32	1.34	1.36	1.44	1.48	1.52	1.60	1.92	2.00	2.10	2.20	2.30	2.40	2.48	2.56	Div'd Decl'd per sh ^B = †	2.80
2.26	2.81	3.00	3.47	5.26	6.30	5.20	5.89	5.95	5.76	5.89	5.96	5.60	5.64	6.26	8.02	8.75	8.50	Cap'l Spending per sh	7.25
20.60	20.65	21.12	21.25	21.86	22.64	23.68	25.09	26.60	31.50	33.22	34.68	36.44	38.60	40.42	41.10	42.45	43.90	Book Value per sh ^C	47.75
35.79	35.97	38.97	35.93	36.00	36.23	36.28	37.22	38.75	46.91	48.17	48.33	49.37	50.32	50.45	50.59	51.50	53.50	Common Shs Outst'g ^D	54.50
17.1	26.0	21.7	13.9	11.5	12.9	12.6	15.7	16.9	16.2	18.4	17.2	17.8	16.8	19.9	19.5	19.5	19.5	Avg Ann'l P/E Ratio	19.0
.91	1.40	1.15	.84	.77	.82	.79	1.00	.95	.85	.93	.90	.90	.91	1.06	1.06	1.00	1.00	Relative P/E Ratio	1.05
3.4%	3.6%	4.1%	5.4%	5.7%	4.9%	4.5%	4.2%	3.7%	3.3%	3.6%	3.4%	3.5%	3.9%	3.3%	4.0%	4.0%	4.0%	Avg Ann'l Div'd Yield	3.7%

CAPITAL STRUCTURE as of 3/31/21
 Total Debt \$2480.9 mill. Due in 5 Yrs \$782.2 mill.
 LT Debt \$2478.2 mill. LT Interest \$87.8 mill.
 Incl. \$14.1 mill. finance leases.
 (LT interest earned: 2.8x)

Pension Assets-12/20 \$688.5 mill.
Oblig \$821.0 mill.

Pfd Stock None

Common Stock 50,675,207 shs.
 as of 4/16/21

MARKET CAP: \$3.1 billion (Mid Cap)

ELECTRIC OPERATING STATISTICS

	2018	2019	2020
% Change Retail Sales (KWH)	+2.9	+4.6	+4.4
Avg. Indust. Use (MWH)	34573	37808	33526
Avg. Indust. Revs. per KWH (c)	NA	NA	NA
Capacity at Peak (Mw)	NA	NA	NA
Peak Load, Winter (Mw)	2173	2237	NA
Annual Load Factor (%)	NA	NA	NA
% Change Customers (yr-end)	+1.2	+1.2	+1.2

Fixed Charge Cov. (%) 275 284 237

ANNUAL RATES	Past 10 Yrs.	Past 5 Yrs.	Past Est'd '18-'20 to '24-'26
Revenues	-3.0%	-2.0%	1.5%
"Cash Flow"	4.0%	4.5%	3.0%
Earnings	5.5%	3.5%	3.0%
Dividends	5.5%	6.5%	3.5%
Book Value	6.0%	5.5%	3.0%

Cal-endar	QUARTERLY REVENUES (\$ mill.)				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2018	341.5	261.8	279.9	314.9	1198.1
2019	384.2	270.7	274.8	328.2	1257.9
2020	335.3	269.4	280.6	313.4	1198.7
2021	400.8	284.2	290	325	1300
2022	370	295	300	335	1300

Cal-endar	EARNINGS PER SHARE ^A				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2018	1.18	.61	.56	1.06	3.40
2019	1.44	.49	.42	1.18	3.53
2020	1.00	.43	.58	1.06	3.06
2021	1.24	.50	.65	1.21	3.60
2022	1.30	.50	.65	1.25	3.70

Cal-endar	QUARTERLY DIVIDENDS PAID ^B = †				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2017	.525	.525	.525	.525	2.10
2018	.55	.55	.55	.55	2.20
2019	.575	.575	.575	.575	2.30
2020	.60	.60	.60	.60	2.40
2021	.62	.62			

BUSINESS: NorthWestern Corporation (doing business as NorthWestern Energy) supplies electricity & gas in the Upper Midwest and Northwest, serving 449,000 electric customers in Montana and South Dakota and 294,000 gas customers in Montana (85% of gross margin), South Dakota (14%), and Nebraska (1%). Electric revenue breakdown: residential, 39%; commercial, 47%; industrial,

After a depressed tally in 2020, NorthWestern's earnings should return to a more-typical level this year. Management estimates that coronavirus-related effects reduced earnings by \$0.09-\$0.14 a share last year. Unfavorable weather patterns lowered the bottom line by \$0.14 a share. Finally, a disallowance of power costs amounted to \$0.15 a share in the fourth quarter. Earnings were much improved in the March period, and we raised our full-year estimate by \$0.10 a share, to the top end of NorthWestern's targeted range of \$3.40-\$3.60.

We estimate 3% earnings growth in 2022. We figure there will be few, if any, coronavirus-related drag. However, average shares outstanding almost certainly will be higher due to expected equity issuances (see below). NorthWestern's goal for yearly profit growth is 3%-6%.

The utility plans to ask the Montana commission for permission to build a gas-fired generating plant. This would add 175 megawatts of capacity at an expected cost of \$250 million. The facility is expected to be on line in late 2023 or early 2024. A decision from the regulators is ex-

pected by May of 2022. **NorthWestern is adding generating capacity in South Dakota, too.** A 60-mw gas-fired unit is under construction at an expected cost of \$80 million. Commercial operation is expected by yearend. The utility is planning to add 30 mw-40 mw in a different part of the state in 2023. The expected cost is about \$60 million.

The company is issuing common equity. This will occur from time to time through a \$200 million at-the-market program. The specific amount each year is uncertain, but the issuances are expected to occur over the next three years. NorthWestern's finances are sound, and its credit ratings are investment grade. However, the company has a negative outlook from Moody's due to a decline in the ratio of funds from operations to debt, which is a key metric for the rating agencies.

The stock's dividend yield is a cut above the utility mean. Total return potential to 2024-2026 is about average, but the equity lacks appeal for the 18-month span. The recent price is near the low end of our 3- to 5-year Target Price Range.

Paul E. Debbas, CFA
 July 23, 2021

OTTER TAIL CORP. NDQ-OTTR				RECENT PRICE	P/E RATIO	RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE															
				47.97	18.5 (Trailing: 19.4; Median: 21.0)	0.87	3.3%																
TIMELINESS	3	Raised 5/14/21	High: 25.4	23.5	25.3	31.9	32.7	33.4	42.6	48.7	51.9	57.7	56.9	49.4	Target Price Range								
SAFETY	2	Raised 6/17/16	Low: 18.2	17.5	20.7	25.2	26.5	24.8	25.8	35.7	39.0	45.9	31.0	39.4	2024	2025	2026						
TECHNICAL	3	Raised 5/21/21	LEGENDS 0.61 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession														160						
BETA	.90	(1.00 = Market)															120						
18-Month Target Price Range																	100						
Low-High																	80						
Midpoint (% to Mid)																	60						
\$35-\$70																	50						
\$53 (10%)																	40						
2024-26 PROJECTIONS																	30						
High	Price	Gain	Ann'l Total															20					
Low	65	(+35%)	Return															15					
	50	(+5%)	17%																				
			5%																				
Institutional Decisions																							
to Buy	3Q2020	4Q2020	1Q2021	Percent																			
to Sell	71	89	75	shares																			
Hld's(000)	74	63	75	traded																			
	19002	19252	19116	9																			
				3																			
CAPITAL STRUCTURE as of 3/31/21																							
Total Debt \$899.3 mill.																							
LT Debt \$624.5 mill.																							
LT Interest \$35.1 mill.																							
(LT interest earned: 4.7x)																							
Leases, Uncapitalized Annual rentals \$5.4 mill.																							
Pension Assets-12/20 \$360.7 mill.																							
Pfd Stock None																							
Common Stock 41,538,084 shs.																							
as of 4/30/21																							
MARKET CAP: \$2.0 billion (Mid Cap)																							
ELECTRIC OPERATING STATISTICS																							
2018			2019		2020																		
% Change Retail Sales (KWH)			+3.4		-2																		
Avg. Indust. Use (MWH)			NA		NA																		
Avg. Indust. Revs. per KWH (c)			5.97		NA																		
Capacity at Peak (Mw)			NA		NA																		
Peak Load, Winter (Mw)			912		NA																		
Annual Load Factor (%)			NA		NA																		
% Change Customers (yr-end)			+2		+1																		
Fixed Charge Cov. (%)			409		407		405																
ANNUAL RATES			Past		Past		Est'd																
of change (per sh)			10 Yrs.		5 Yrs.		'18-'20																
Revenues			-3.5%		-		4.0%																
"Cash Flow"			4.0%		6.0%		6.5%																
Earnings			11.5%		8.0%		7.0%																
Dividends			1.5%		3.0%		5.5%																
Book Value			.5%		5.0%		5.5%																
QUARTERLY REVENUES (\$ mill.)			Full																				
Cal-	Mar.31	Jun.30	Sep.30	Dec.31	Year																		
2018	241.2	226.3	227.7	221.2	916.4																		
2019	246.0	229.2	228.6	215.7	919.5																		
2020	234.7	192.8	235.8	226.8	890.1																		
2021	261.7	233.3	245	230	970																		
2022	265	245	260	250	1020																		
EARNINGS PER SHARE ^A			Full																				
Cal-	Mar.31	Jun.30	Sep.30	Dec.31	Year																		
2018	.66	.47	.58	.35	2.06																		
2019	.66	.39	.62	.51	2.17																		
2020	.60	.42	.87	.45	2.34																		
2021	.73	.50	.87	.50	2.60																		
2022	.75	.55	.90	.55	2.75																		
QUARTERLY DIVIDENDS PAID ^B			Full																				
Cal-	Mar.31	Jun.30	Sep.30	Dec.31	Year																		
2017	.32	.32	.32	.32	1.28																		
2018	.335	.335	.335	.335	1.34																		
2019	.35	.35	.35	.35	1.40																		
2020	.37	.37	.37	.37	1.48																		
2021	.39	.39																					
<p>OTTER TAIL CORPORATION RAISED ITS 2021 EARNINGS GUIDANCE UPON REPORTING FIRST-QUARTER RESULTS. The Plastics division fared much better than expected after the cold snap in the Gulf Coast disrupted the supply of PVC resin. This led to higher prices for PVC pipe, and thus higher margins for Otter Tail's subsidiary. Management expects high prices to persist over the remainder of the year, and thus raised its share-profit expectation for this segment from \$0.52-\$0.56 to \$0.73-\$0.77 (versus \$0.67 in 2020). Otter Tail raised its share-net target for the entire company from \$2.39-\$2.54 to \$2.47-\$2.62, despite its expectation that utility income will be less than it expected due in part to first-quarter weather patterns. We lifted our estimate by \$0.15, to \$2.60. Because we now figure that income at the Plastics operation in 2022 will be better than we expected three months ago, we also boosted our share-net estimate for next year by \$0.15, to \$2.75.</p> <p>Otter Tail Power revised its rate case in Minnesota. Initially, the utility filed for an increase of \$14.5 million (6.8%). Due to the expectation of lower depreciation</p>																							
<p>costs: 12% of revenues. Also has operations in manufacturing and plastics (30% of '20 operating income). '20 deprec. rate: 2.7%. Has 2,100 employees. Chairman: Nathan I. Partain. President & CEO: Charles S. MacFarlane. Inc.: Minnesota. Address: 215 South Cascade St., P.O. Box 496, Fergus Falls, Minnesota 56538-0496. Tel.: 866-410-8780. Internet: www.ottertail.com.</p> <p>rates and lower pension expense, the company reduced its requested increase to \$8.2 million (3.8%). The requested return on equity and common-equity ratio remain 10.2% and 52.5%, respectively. An interim hike of \$6.9 million (3.2%) took effect at the start of 2021. An order is expected in late 2021 or early 2022.</p> <p>Despite the company's improved prospects, there are some causes for concern. Conditions in the Plastics division can change quickly, and the possibility exists that resin availability eventually affects the company. The Manufacturing segment is facing rising steel prices and a labor shortage. Finally, a possible elimination of a half percentage point ROE "adder" by the Federal Energy Regulatory Commission would have a slight negative effect on Otter Tail's earning power.</p> <p>The stock has performed well of late. The price is up nearly 16% since our mid-March report and 12% year to date. The dividend yield is about average for a utility. However, total return potential does not stand out for the 18-month or 3- to 5-year periods.</p> <p><i>Paul E. Debbas, CFA</i> <i>June 11, 2021</i></p>																							
<p>(A) Dil. EPS. Excl. nonrec. gains (loss): '10, (44c); '11, 26c; '13, 2c; gains (losses) from disc. ops.: '05, 33c; '06, 1c; '11, (\$1.11); '12, (\$1.22); '13, 2c; '14, 2c; '15, 2c; '16, 1c; '17, 1c. '19 EPS don't sum due to rounding. Next earnings report due early Aug. (B) Div'ds histor. pd. in early Mar., Jun., Sept., & Dec. (C) Div'd reinv. plan avail. (C) Incl. intang. in '20: \$5.21/sh. (D) In mill. (E) Rate all'd on com. eq. in MN in '17: 9.41%; in ND in '18: 9.77%; in SD in '19: 8.75%; earn. avg. com. eq., '20: 11.6%. Reg. Clim.: MN, ND, Avg.; SD, Above Avg.</p>																							
<p>Company's Financial Strength A Stock's Price Stability 100 Price Growth Persistence 65 Earnings Predictability 95</p>																							
<p>To subscribe call 1-800-VALUELINE</p>																							

XCEL ENERGY NDQ-XEL				RECENT PRICE	P/E RATIO	TRAILING P/E RATIO	RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE							
TIMELINESS 3 Lowered 3/19/21 SAFETY 1 Raised 5/1/15 TECHNICAL 3 Lowered 7/23/21 BETA .80 (1.00 = Market)				High: 24.4 Low: 19.8	27.8 21.2	29.9 25.8	31.8 26.8	37.6 27.3	38.3 31.8	45.4 35.2	52.2 40.0	54.1 41.5	66.1 47.7	76.4 46.6	72.9 57.2	Target Price Range 2024 2025 2026
18-Month Target Price Range Low-High Midpoint (% to Mid) \$53-\$110 \$82 (20%)																% TOT. RETURN 6/21 THIS STOCK VS. ARITH. INDEX 1 yr. 8.3 63.9 3 yr. 56.7 53.6 5 yr. 70.5 108.0
2024-26 PROJECTIONS Price Gain Ann'l Total Return High 75 (+10%) 5% Low 60 (-10%) Nil				Institutional Decisions 3Q2020 4Q2020 1Q2021 to Buy 356 411 348 to Sell 362 350 396 Hld's(000) 407854 405434 405318 Percent shares traded 30 20 10												
CAPITAL STRUCTURE as of 3/31/21 Total Debt \$22968 mill. Due in 5 Yrs \$4904 mill. LT Debt \$21470 mill. LT Interest \$800 mill. Incl. \$73 mill. finance leases. (LT interest earned: 2.8x)				Leases, Uncapitalized Annual rentals \$273 mill. Pension Assets-12/20 \$3599 mill. Oblig \$3964 mill. Pfd Stock None Common Stock 538,206,800 shs. as of 4/22/21 MARKET CAP: \$37 billion (Large Cap)												
ELECTRIC OPERATING STATISTICS 2018 2019 2020 % Change Retail Sales (KWH) +3.2 -1.2 -2.3 Large C & I Use (MWH) 23004 NA NA Large C & I Revs. per KWH (¢) 5.91 5.96 5.78 Capacity at Peak (Mw) NA NA NA Peak Load, Summer (Mw) 20293 20146 19665 Annual Load Factor (%) NA NA NA % Change Customers (yr-end) +1.1 +1.0 NA				AS USUAL, XCEL ENERGY HAS A LOT OF REGULATORY MATTERS PENDING. The company is awaiting orders on electric rate cases in Wisconsin, North Dakota, Texas, and New Mexico. In Wisconsin, Northern States Power reached a settlement calling for raises in electric rates of \$35 million in 2022 and \$18 million in 2023, respectively, and gas hikes of \$10 million in 2022 and \$3 million in 2023. The allowed return on equity would be 9.8% in 2022 and 10% in 2023. In North Dakota, NSP reached a settlement calling for an increase of \$7 million, based on a 9.5% ROE. Orders are expected in the fourth quarter of 2021. Southwestern Public Service is asking the commissions in Texas and New Mexico for hikes of \$143 million and \$88 million, respectively, based on a 10.35% ROE. Orders are expected in the fourth quarter and first quarter in New Mexico and Texas, respectively. Public Service of Colorado filed for a \$470 million base rate increase (including \$127 million that is already being recovered through riders on customers' bills), based on a 10% ROE. The company is asking the regulators in Minnesota and Colorado to approve integrated resource plans. Xcel is asking regulators to approve the recovery of \$936 million of higher gas costs stemming from a winter storm in February. The commissions in Wisconsin and New Mexico have already given their approval, and Xcel is waiting to hear from three other states. Finally, the company might file an electric rate case in Minnesota later this year. We expect a continuation of steady profit growth in 2021 and 2022. Rate relief and effective expense control are key factors. The company got off to a good start in the March quarter. Our estimate remains at the midpoint of the company's targeted range of \$2.90-\$3.00 a share. We estimate a 5% increase, to \$3.10 a share, in 2022. This can be considered conservative, as Xcel's goal for annual earnings growth is 5%-7%. Top-quality Xcel stock has a high valuation. The dividend yield is below average for a utility. Total return potential is appealing for the next 18 months, but not for the 3- to 5-year period. The recent quotation is well within our 2024-2026 Target Price Range. Paul E. Debbas, CFA July 23, 2021												
ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Est'd '18-'20 to '24-'26 Revenues - -5.5% 2.5% "Cash Flow" 6.0% 7.5% 6.0% Earnings 6.0% 5.5% 6.0% Dividends 5.5% 6.0% 6.0% Book Value 4.5% 5.0% 5.0%				Business: Xcel Energy Inc. is the parent of Northern States Power, which supplies electricity to Minnesota, Wisconsin, North Dakota, South Dakota & Michigan & gas to Minnesota, Wisconsin, North Dakota & Michigan; P.S. of Colorado, which supplies electricity & gas to Colorado; & Southwestern Public Service, which supplies electricity to Texas & New Mexico. Customers: 3.7 mill. elec., 2.1 mill. gas. Elec. rev. breakdown: res'l, 31%; sm. comm'l & ind'l, 36%; lg. comm'l & ind'l, 18%; other, 15%. Generating sources not avail. Fuel costs: 36% of revs. '20 reported depr. rate: 3.4%. Has 11,400 empl. Chairman & CEO: Ben Fowke. President & COO: Bob Frenzel. Inc.: MN. Address: 414 Nicollet Mall, Minneapolis, MN 55401. Tel.: 612-330-5500. Internet: www.xcelenergy.com.												
QUARTERLY REVENUES (\$ mill.) Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2018 2951 2658 3048 2880 11537 2019 3141 2577 3013 2798 11529 2020 2811 2586 3182 2947 11526 2021 3541 2700 3209 3050 12500 2022 3250 2750 3300 3200 12500				QUARTERLY DIVIDENDS PAID (\$) Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2017 .34 .36 .36 .36 1.42 2018 .36 .38 .38 .38 1.50 2019 .38 .405 .405 .405 1.60 2020 .405 .43 .43 .43 1.70 2021 .43 .4575 .4575												
EARNINGS PER SHARE Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2018 .57 .52 .96 .42 2.47 2019 .61 .46 1.01 .56 2.64 2020 .56 .54 1.14 .54 2.79 2021 .67 .55 1.15 .58 2.95 2022 .70 .55 1.20 .65 3.10				Fixed Charge Cov. (%) 281 272 252												
2021 Value Line, Inc. 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.				(A) Diluted EPS. Excl. nonrecurring gain (losses): '10, 5¢; '15, (16¢); '17, (5¢); gains (loss) on discontinued ops.: '05, 3¢; '06, 1¢; '09, (1¢); '10, 1¢. '20 EPS don't sum due to rounding. Next earnings report due late July. (B) Div'ds historically paid mid-Jan., Apr., July, and Oct. ■ Div'd reinvestment plan available. (C) Incl. intangibles. In '20: \$2373 mill., \$4.42/sh. (D) In mill. (E) Rate base: Varies. Rate allowed on com. eq. (blended): 9.6%; earned on avg. com. eq., '20: 10.6%. Regulatory Climate: Average. Company's Financial Strength A+ Stock's Price Stability 95 Price Growth Persistence 65 Earnings Predictability 100 To subscribe call 1-800-VALUELINE												

Northern States Power Company
Summary of Risk Premium Models for the
Proxy Group of Thirteen Electric Companies

	<u>Proxy Group of Thirteen Electric Companies</u>
Predictive Risk Premium Model (PRPM) (1)	11.16 %
Risk Premium Using an Adjusted Total Market Approach (2)	<u>10.73 %</u>
Average	<u><u>10.95 %</u></u>

Notes:

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

Northern States Power Company
 Indicated ROE
Derived by the Predictive Risk Premium Model (1)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
<u>Proxy Group of Thirteen Electric Companies</u>	LT Average Predicted Variance	Spot Predicted Variance	Recommended Variance (2)	GARCH Coefficient	Predicted Risk Premium (3)	Risk-Free Rate (4)	Indicated ROE (5)
Alliant Energy Corporation	0.27%	0.34%	0.31%	2.7403	10.59%	2.70%	13.29%
Ameren Corporation	0.23%	0.32%	0.28%	2.0383	6.98%	2.70%	9.68%
Duke Energy Corporation	0.31%	0.31%	0.31%	1.8669	7.19%	2.70%	9.89%
Edison International	0.43%	0.49%	0.46%	1.4734	8.44%	2.70%	11.14%
Energy Corporation	0.40%	0.51%	0.46%	2.2355	13.00%	2.70%	15.70%
Evergy, Inc.	0.36%	0.37%	0.36%	1.5092	6.78%	2.70%	9.48%
IDACORP, Inc.	0.29%	0.41%	0.35%	2.2119	9.61%	2.70%	12.31%
NorthWestern Corporation	0.34%	0.26%	0.30%	2.3747	8.93%	2.70%	11.63%
OGE Energy Corporation	0.31%	0.24%	0.28%	2.1950	7.50%	2.70%	10.20%
Otter Tail Corporation	0.37%	0.26%	0.32%	1.7137	6.71%	2.70%	9.41%
Pinnacle West Capital Corporation	0.60%	0.34%	0.47%	1.2594	7.35%	2.70%	10.05%
Portland General Electric Company	0.28%	0.34%	0.31%	2.1651	8.28%	2.70%	10.98%
Xcel Energy, Inc.	0.28%	0.34%	0.31%	2.8250	10.91%	2.70%	<u>13.61%</u>
						Average	<u>11.34%</u>
						Median	<u>10.98%</u>
						Average of Mean and Median	<u>11.16%</u>

Notes:

- (1) The Predictive Risk Premium Model uses historical data to generate a predicted variance and a GARCH coefficient. The historical data used are the equity risk premiums for the first available trading month as reported by Bloomberg Professional Service.
- (2) Average of Columns [1] and [2].
- (3) $(1 + (\text{Column [3]} * \text{Column [4]})^{1/2}) - 1$.
- (4) From note 2 on page 2 of Exhibit (DWD-1), Schedule 7.
- (5) Column [5] + Column [6].

Northern States Power Company
 Indicated Common Equity Cost Rate
 Through Use of a Risk Premium Model
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Thirteen Electric Companies</u>
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	3.41 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A2 Rated Public Utility Bonds	<u>0.38</u> (2)
3.	Adjusted Prospective Yield on A2 Rated Public Utility Bonds	3.79 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group	<u>0.13</u> (3)
5.	Adjusted Prospective Bond Yield	3.92 %
6.	Equity Risk Premium (4)	<u>6.81</u>
7.	Risk Premium Derived Common Equity Cost Rate	<u><u>10.73</u></u> %

- Notes: (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 10 and 11 of this Schedule).
- (2) The average yield spread of A2 rated public utility bonds over Aaa rated corporate bonds of 0.38% from page 4 of this Schedule.
- (3) Adjustment to reflect the A3/Baa1 Moody's LT issuer rating of the Utility Proxy Group as shown on page 5 of this Schedule. The 0.13% upward adjustment is derived by taking 1/2 of the spread between A2 and Baa2 Public Utility Bonds ($1/2 * 0.25\% = 0.13\%$) as derived from page 4 of this Schedule.
- (4) From page 7 of this Schedule.

Northern States Power Company
Interest Rates and Bond Spreads for
Moody's Corporate and Public Utility Bonds

Selected Bond Yields

	[1]	[2]	[3]
	<u>Aaa Rated Corporate Bond</u>	<u>A2 Rated Public Utility Bond</u>	<u>Baa2 Rated Public Utility Bond</u>
Aug-2021	2.55 %	2.95 %	3.19 %
Jul-2021	2.57	2.95	3.20
Jun-2021	<u>2.79</u>	<u>3.16</u>	<u>3.41</u>
Average	<u>2.64 %</u>	<u>3.02 %</u>	<u>3.27 %</u>

Selected Bond Spreads

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:
0.38 % (1)

Baa2 Rated Public Utility Bonds Over A2 Rated Public Utility Bonds:
0.25 % (2)

Notes:

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

Source of Information:

Bloomberg Professional Service

Northern States Power Company
 Comparison of Long-Term Issuer Ratings for
Proxy Group of Thirteen Electric Companies

	<u>Moody's</u>		<u>Standard & Poor's</u>	
	<u>Long-Term Issuer Rating</u>		<u>Long-Term Issuer Rating</u>	
<u>Proxy Group of Thirteen Electric Companies</u>	<u>August 2021</u>		<u>August 2021</u>	
	Long-Term Issuer Rating (1)	Numerical Weighting (2)	Long-Term Issuer Rating (1)	Numerical Weighting (2)
Alliant Energy Corporation	A3/Baa1	7.5	A/A-	6.5
Ameren Corporation	A3	7.0	BBB+	8.0
Duke Energy Corporation	A3	7.0	BBB+	8.0
Edison International	Baa2	9.0	BBB	9.0
Entergy Corporation	Baa1/Baa2	8.5	BBB+	8.0
Evergy, Inc.	Baa1	8.0	A-	7.0
IDACORP, Inc.	A3	7.0	BBB	9.0
NorthWestern Corporation	Baa2	9.0	BBB	9.0
OGE Energy Corporation	A3	7.0	A-	7.0
Otter Tail Corporation	A3	7.0	BBB+	8.0
Pinnacle West Capital Corporation	A2	6.0	A-	7.0
Portland General Electric Company	A3	7.0	BBB+	8.0
Xcel Energy, Inc.	A3	7.0	A-	7.0
Average	<u>A3/Baa1</u>	<u>7.5</u>	<u>BBB+</u>	<u>7.8</u>

Notes:

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

Source Information: Moody's Investors Service
 Standard & Poor's Global Utilities Rating Service

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

<u>Moody's Bond Rating</u>	<u>Numerical Bond Weighting</u>	<u>Standard & Poor's Bond Rating</u>
Aaa	1	AAA
Aa1	2	AA+
Aa2	3	AA
Aa3	4	AA-
A1	5	A+
A2	6	A
A3	7	A-
Baa1	8	BBB+
Baa2	9	BBB
Baa3	10	BBB-
Ba1	11	BB+
Ba2	12	BB
Ba3	13	BB-
B1	14	B+
B2	15	B
B3	16	B-

Northern States Power Company
Judgment of Equity Risk Premium for
Proxy Group of Thirteen Electric Companies

<u>Line No.</u>		<u>Proxy Group of Thirteen Electric Companies</u>
1.	Calculated equity risk premium based on the total market using the beta approach (1)	9.01 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A2 rated bonds (2)	5.62
3.	Predicted Equity Risk Premium Based on Regression Analysis of 1,183 Fully-Litigated Electric Utility Rate Cases	<u>5.81</u>
4.	Average equity risk premium	<u><u>6.81 %</u></u>

Notes: (1) From page 8 of this Schedule.
 (2) From page 12 of this Schedule.
 (3) From page 13 of this Schedule.

Northern States Power Company
 Derivation of Equity Risk Premium Based on the Total Market Approach
 Using the Beta for the
Proxy Group of Thirteen Electric Companies

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Thirteen Electric Companies</u>
<u>Ibbotson-Based Equity Risk Premiums:</u>		
1.	Ibbotson Equity Risk Premium (1)	5.92 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.87
3.	Ibbotson Equity Risk Premium based on PRPM (3)	7.88
4.	Equity Risk Premium Based on Value Line Summary and Index (4)	5.53
5.	Equity Risk Premium Based on Value Line S&P 500 Companies (5)	11.64
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>14.76</u>
7.	Conclusion of Equity Risk Premium	9.10 %
8.	Adjusted Beta (7)	<u>0.99</u>
9.	Forecasted Equity Risk Premium	<u><u>9.01 %</u></u>

Notes provided on page 9 of this Schedule.

Northern States Power Company
Derivation of Equity Risk Premium Based on the Total Market Approach
Using the Beta for the
Proxy Group of Thirteen Electric Companies

Notes:

- (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2021 Market Report minus the arithmetic mean monthly yield of Moody's average Aaa and Aa2 corporate bonds from 1928-2020.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of large company common stocks relative to Moody's average Aaa and Aa2 rated corporate bond yields from 1928-2020 referenced in Note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is discussed in the accompanying direct testimony. The Ibbotson equity risk premium based on the PRPM is derived by applying the PRPM to the monthly risk premiums between Ibbotson large company common stock monthly returns and average Aaa and Aa2 corporate monthly bond yields, from January 1928 through August 2021.
- (4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the average consensus forecast of Aaa corporate bonds of 3.41% (from page 3 of this Schedule) from the projected 3-5 year total annual market return of 8.94% (described fully in note 1 on page 2 of Exhibit__(DWD-1), Schedule 7).
- (5) Using data from Value Line for the S&P 500, an expected total return of 15.05% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.41% results in an expected equity risk premium of 11.64%.
- (6) Using data from the Bloomberg Professional Service for the S&P 500, an expected total return of 18.17% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.41% results in an expected equity risk premium of 14.76%.
- (7) Average of mean and median beta from Exhibit__(DWD-1), Schedule 7.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2021 SBBI Yearbook, John Wiley & Sons, Inc.
Industrial Manual and Mergent Bond Record Monthly Update.
Value Line Summary and Index
Blue Chip Financial Forecasts, September 1, 2021 and June 1, 2021
Bloomberg Professional Service

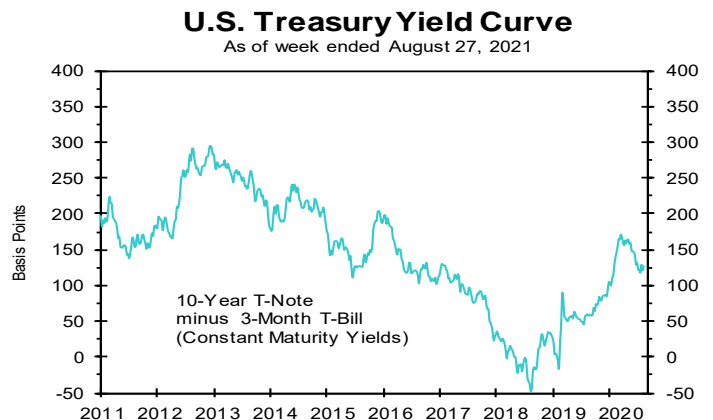
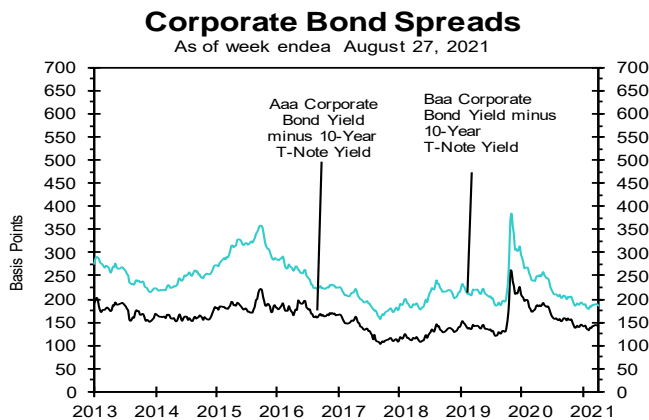
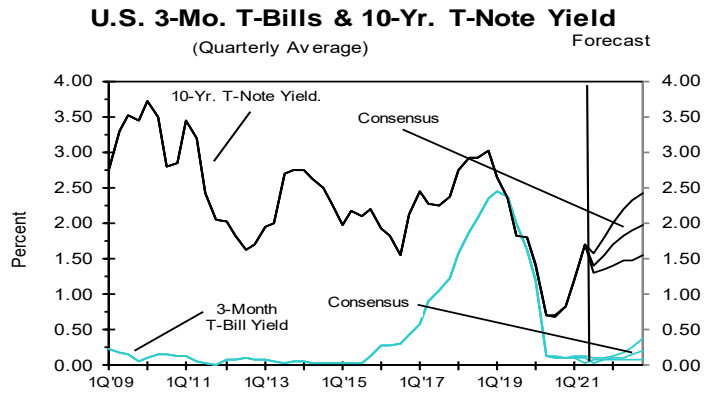
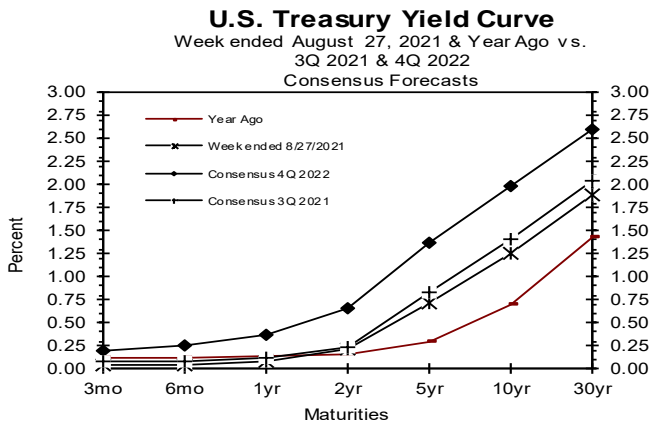
2 ■ BLUE CHIP FINANCIAL FORECASTS ■ SEPTEMBER 1, 2021

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

Interest Rates	History								Consensus Forecasts-Quarterly Avg.						
	Average For Week Ending				Average For Month				Latest Qtr	3Q 2021	4Q 2021	1Q 2022	2Q 2022	3Q 2022	4Q 2022
	Aug 27	Aug 20	Aug 13	Aug 6	Jul	Jun	May	2Q 2021	2021	2021	2022	2022	2022	2022	
Federal Funds Rate	0.09	0.10	0.10	0.09	0.10	0.08	0.06	0.07	0.1	0.1	0.1	0.1	0.1	0.1	
Prime Rate	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.3	3.3	3.3	3.3	3.3	3.3	
LIBOR, 3-mo.	0.12	0.13	0.12	0.12	0.13	0.13	0.15	0.16	0.2	0.2	0.2	0.3	0.3	0.3	
Commercial Paper, 1-mo.	0.05	0.06	0.06	0.05	0.05	0.04	0.10	0.06	0.1	0.1	0.1	0.1	0.2	0.2	
Treasury bill, 3-mo.	0.05	0.06	0.06	0.05	0.05	0.04	0.02	0.03	0.1	0.1	0.1	0.1	0.2	0.2	
Treasury bill, 6-mo.	0.06	0.05	0.06	0.06	0.05	0.05	0.04	0.04	0.1	0.1	0.1	0.2	0.2	0.3	
Treasury bill, 1 yr.	0.07	0.07	0.08	0.08	0.08	0.07	0.05	0.06	0.1	0.1	0.2	0.2	0.3	0.4	
Treasury note, 2 yr.	0.23	0.22	0.23	0.19	0.22	0.20	0.16	0.17	0.2	0.3	0.4	0.5	0.5	0.6	
Treasury note, 5 yr.	0.81	0.78	0.81	0.69	0.76	0.84	0.82	0.84	0.8	0.9	1.1	1.2	1.3	1.4	
Treasury note, 10 yr.	1.31	1.26	1.34	1.22	1.32	1.52	1.62	1.59	1.4	1.6	1.7	1.8	1.9	2.0	
Treasury note, 30 yr.	1.92	1.90	1.98	1.87	1.94	2.16	2.32	2.26	2.1	2.2	2.3	2.5	2.5	2.6	
Corporate Aaa bond	2.72	2.70	2.79	2.67	2.72	2.91	3.06	3.00	2.7	2.9	3.0	3.1	3.2	3.3	
Corporate Baa bond	3.17	3.15	3.23	3.11	3.17	3.35	3.52	3.46	3.4	3.7	3.9	4.0	4.1	4.2	
State & Local bonds	2.64	2.65	2.65	2.63	2.60	2.64	2.64	2.65	2.3	2.5	2.5	2.6	2.7	2.7	
Home mortgage rate	2.87	2.86	2.87	2.77	2.87	2.98	2.96	3.00	3.0	3.1	3.2	3.3	3.5	3.5	

Key Assumptions	History								Consensus Forecasts-Quarterly					
	3Q 2019	4Q 2019	1Q 2020	2Q 2020	3Q 2020	4Q 2020	1Q 2021	2Q 2021	3Q 2021	4Q 2021	1Q 2022	2Q 2022	3Q 2022	4Q 2022
	2019	2019	2020	2020	2020	2020	2021	2021	2021	2021	2022	2022	2022	2022
Fed's AFE \$ Index	110.6	110.5	111.4	112.4	107.3	105.2	103.4	102.9	105.0	105.2	105.0	104.7	104.5	104.3
Real GDP	2.8	1.9	-5.1	-31.2	33.8	4.5	6.3	6.6	6.4	5.4	4.1	3.4	2.9	2.4
GDP Price Index	1.4	1.5	1.6	-1.5	3.6	2.2	4.3	6.1	4.2	2.8	2.4	2.3	2.4	2.3
Consumer Price Index	1.3	2.6	1.0	-3.1	4.7	2.4	3.7	8.4	5.5	2.4	2.2	2.3	2.4	2.2
PCE Price Index	1.1	1.7	1.3	-1.6	3.7	1.5	3.8	6.5	4.3	2.3	2.1	2.1	2.2	2.2

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

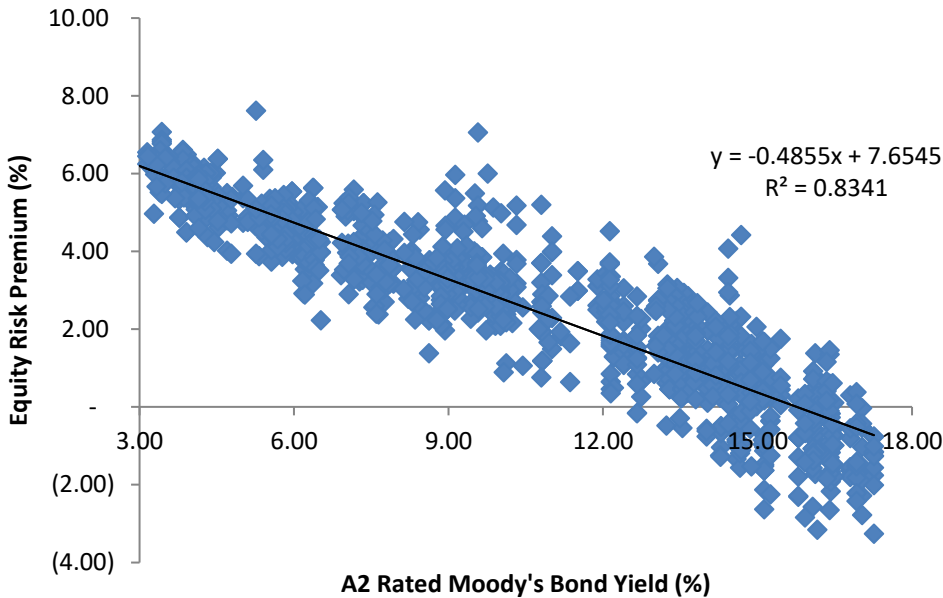


Northern States Power Company
 Derivation of Mean Equity Risk Premium Based Studies
 Using Holding Period Returns and
Projected Market Appreciation of the S&P Utility Index

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

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

Northern States Power Company
Prediction of Equity Risk Premiums Relative to
Moody's A2 Rated Utility Bond Yields



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

Notes:
 (1) From line 3 of page 3 of this Schedule.

Source of Information: Regulatory Research Associates

Northern States Power Company
 Indicated Common Equity Cost Rate Through Use
 of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Thirteen Electric Companies	Value Line Adjusted Beta	Bloomberg Adjusted Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
Alliant Energy Corporation	0.85	1.03	0.94	9.93 %	2.70 %	12.03 %	12.18 %	12.11 %
Ameren Corporation	0.80	0.95	0.88	9.93	2.70	11.44	11.73	11.58
Duke Energy Corporation	0.90	0.98	0.94	9.93	2.70	12.03	12.18	12.11
Edison International	0.95	1.10	1.02	9.93	2.70	12.83	12.78	12.80
Energy Corporation	0.95	1.19	1.07	9.93	2.70	13.32	13.15	13.23
Evergy, Inc.	0.95	1.07	1.01	9.93	2.70	12.73	12.70	12.71
IDACORP, Inc.	0.85	1.04	0.95	9.93	2.70	12.13	12.25	12.19
NorthWestern Corporation	0.95	1.27	1.11	9.93	2.70	13.72	13.45	13.58
OGE Energy Corporation	1.05	1.28	1.16	9.93	2.70	14.22	13.82	14.02
Otter Tail Corporation	0.90	1.07	0.98	9.93	2.70	12.43	12.48	12.45
Pinnacle West Capital Corporation	0.90	1.16	1.03	9.93	2.70	12.92	12.85	12.89
Portland General Electric Company	0.90	1.06	0.98	9.93	2.70	12.43	12.48	12.45
Xcel Energy, Inc.	0.80	0.99	0.89	9.93	2.70	11.53	11.81	11.67
Mean			<u>1.00</u>			<u>12.60 %</u>	<u>12.60 %</u>	<u>12.60 %</u>
Median			<u>0.98</u>			<u>12.43 %</u>	<u>12.48 %</u>	<u>12.45 %</u>
Average of Mean and Median			<u>0.99</u>			<u>12.52 %</u>	<u>12.54 %</u>	<u>12.53 %</u>

Notes on page 2 of this Schedule.

Northern States Power Company
Notes to Accompany the Application of the CAPM and ECAPM

Notes:

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

Historical Data MRP Estimates:

Measure 1: Ibbotson Arithmetic Mean MRP (1926-2020)

Arithmetic Mean Monthly Returns for Large Stocks 1926-2020:	12.20 %
Arithmetic Mean Income Returns on Long-Term Government Bonds:	5.05
MRP based on Ibbotson Historical Data:	7.15 %

Measure 2: Application of a Regression Analysis to Ibbotson Historical Data (1926-2020)

9.57 %

Measure 3: Application of the PRPM to Ibbotson Historical Data: (January 1926 - August 2021)

8.77 %

Value Line MRP Estimates:

Measure 4: Value Line Projected MRP (Thirteen weeks ending September 03, 2021)

Total projected return on the market 3-5 years hence*:	8.94 %
Projected Risk-Free Rate (see note 2):	2.70
MRP based on Value Line Summary & Index:	6.24 %

*Forecasted 3-5 year capital appreciation plus expected dividend yield

Measure 5: Value Line Projected Return on the Market based on the S&P 500

Total return on the Market based on the S&P 500:	15.05 %
Projected Risk-Free Rate (see note 2):	2.70
MRP based on Value Line data	12.35 %

Measure 6: Bloomberg Projected MRP

Total return on the Market based on the S&P 500:	18.17 %
Projected Risk-Free Rate (see note 2):	2.70
MRP based on Bloomberg data	15.47 %

Average of Value Line, Ibbotson, and Bloomberg MRP: 9.93 %

- (2) For reasons explained in the direct testimony, the appropriate risk-free rate for cost of capital purposes is the average forecast of 30 year Treasury Bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts. (See pages 10 and 11 of Exhibit_(DWD-1), Schedule 6.) The projection of the risk-free rate is illustrated below:

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

- (3) Average of Column 6 and Column 7.

Sources of Information:

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

Northern States Power Company
Basis of Selection of the Group of Non-Price Regulated Companies
Comparable in Total Risk to the Utility Proxy Group

The criteria for selection of the proxy group of 50 non-price regulated companies was that the non-price regulated companies be domestic and reported in Value Line Investment Survey (Standard Edition).

The Non-Price Regulated Proxy Group were then selected based on the unadjusted beta range of 0.68 – 0.96 and residual standard error of the regression range of 2.5491 – 3.0403 of the Utility Proxy Group.

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

The standard deviation of the Utility Proxy Group's residual standard error of the regression is 0.1228. The standard deviation of the standard error of the regression is calculated as follows:

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

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

$$\text{Thus, } 0.1228 = \frac{2.7947}{\sqrt{518}} = \frac{2.7947}{22.7596}$$

Source of Information: Value Line, Inc., June 2021
Value Line Investment Survey (Standard Edition)

Northern States Power Company
 Basis of Selection of Comparable Risk
Domestic Non-Price Regulated Companies

	[1]	[2]	[3]	[4]
<u>Proxy Group of Thirteen Electric Companies</u>	<u>Value Line Adjusted Beta</u>	<u>Unadjusted Beta</u>	<u>Residual Standard Error of the Regression</u>	<u>Standard Deviation of Beta</u>
Alliant Energy Corporation	0.85	0.72	2.7798	0.0694
Ameren Corporation	0.80	0.69	2.6359	0.0658
Duke Energy Corporation	0.85	0.77	2.7562	0.0688
Edison International	0.95	0.91	3.2779	0.0818
Entergy Corporation	0.95	0.88	2.7090	0.0676
Evergy, Inc.	0.95	0.90	3.2697	0.0861
IDACORP, Inc.	0.85	0.70	2.5983	0.0648
NorthWestern Corporation	0.95	0.89	2.8009	0.0699
OGE Energy Corporation	1.05	1.06	2.7189	0.0678
Otter Tail Corporation	0.90	0.79	2.4385	0.0608
Pinnacle West Capital Corporation	0.90	0.84	2.7822	0.0694
Portland General Electric Company	0.90	0.79	2.8356	0.0707
Xcel Energy, Inc.	0.80	0.66	2.7280	0.0681
Average	<u>0.90</u>	<u>0.82</u>	<u>2.7947</u>	<u>0.0701</u>
Beta Range (+/- 2 std. Devs. of Beta) 2 std. Devs. of Beta	0.68 0.14	0.96		
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.5491	3.0403		
Std. dev. of the Res. Std. Err.	0.1228			
2 std. devs. of the Res. Std. Err.	0.2456			

Source of Information: Valueline Proprietary Database, June 2021

Northern States Power Company
 Proxy Group of Non-Price Regulated Companies
 Comparable in Total Risk to the
Proxy Group of Thirteen Electric Companies

	[1]	[2]	[3]	[4]
Proxy Group of Fifty Non-Price Regulated Companies	VL Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Agilent Technologies	0.90	0.79	2.5758	0.0643
Abbott Labs.	0.90	0.84	2.7516	0.0687
Analog Devices	0.95	0.87	2.7247	0.0680
Assurant Inc.	0.90	0.84	2.8245	0.0705
Smith (A.O.)	0.85	0.75	2.7193	0.0678
Air Products & Chem.	0.90	0.79	2.6162	0.0653
Brown-Forman 'B'	0.90	0.81	2.7054	0.0675
Broadridge Fin'l	0.80	0.69	2.7697	0.0691
Brady Corp.	1.00	0.94	2.9465	0.0735
CACI Int'l	0.95	0.89	2.9930	0.0747
Cerner Corp.	0.90	0.82	2.6729	0.0667
Chemed Corp.	0.85	0.70	2.6649	0.0665
Cooper Cos.	0.95	0.90	2.6935	0.0672
CSW Industrials	0.90	0.82	2.8095	0.0701
Quest Diagnostics	0.80	0.69	2.9288	0.0731
Dolby Labs.	0.95	0.90	2.6027	0.0649
Lauder (Estee)	0.95	0.91	2.8562	0.0713
Exponent, Inc.	0.90	0.81	2.9605	0.0739
FactSet Research	1.00	0.95	2.6488	0.0661
Gentex Corp.	0.95	0.92	2.7712	0.0691
Hershey Co.	0.85	0.74	2.6733	0.0667
Ingredion Inc.	0.90	0.84	2.8771	0.0718
Hunt (J.B.)	0.95	0.87	2.8702	0.0716
J&J Snack Foods	0.95	0.86	2.9559	0.0738
Henry (Jack) & Assoc	0.85	0.71	2.8328	0.0707
L3Harris Technologie	1.00	0.93	2.7401	0.0772
Lennox Int'l	1.00	0.92	2.6639	0.0665
McCormick & Co.	0.80	0.68	2.7869	0.0695
Monster Beverage	0.85	0.76	3.0195	0.0753
Altria Group	0.95	0.86	2.9525	0.0737
MSA Safety	1.00	0.94	3.0342	0.0757
MSCI Inc.	0.95	0.87	2.9742	0.0742
Motorola Solutions	0.90	0.79	2.7312	0.0681
Mettler-Toledo Int'l	0.95	0.90	2.6192	0.0653
Northrop Grumman	0.85	0.72	2.8865	0.0720
Old Dominion Freight	0.90	0.86	2.9913	0.0746
Packaging Corp.	1.00	0.92	2.8690	0.0716
Post Holdings	0.95	0.87	2.9481	0.0736
Rollins, Inc.	0.85	0.73	2.9580	0.0738
Service Corporation International	0.95	0.91	2.5560	0.0638
Sherwin-Williams	0.95	0.85	2.6598	0.0664
Selective Ins. Group	0.90	0.80	2.9918	0.0746
Sirius XM Holdings	0.95	0.88	2.8551	0.0712
Synopsys, Inc.	0.95	0.91	2.8936	0.0722
Texas Instruments Inc.	0.85	0.76	2.6736	0.0667
AMERCO	0.95	0.89	2.6678	0.0666
UniFirst Corp.	0.95	0.92	2.7694	0.0691
VeriSign Inc.	0.90	0.79	2.6717	0.0667
Waters Corp.	0.95	0.87	2.7917	0.0697
Watsco, Inc.	0.85	0.73	2.7408	0.0684
Average	0.92	0.83	2.7978	0.0700
Proxy Group of Thirteen Electric Companies	0.90	0.82	2.7947	0.0701

Source of Information:

ValueLine Proprietary Database, June 2021

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

<u>Principal Methods</u>	<u>Proxy Group of Fifty Non-Price Regulated Companies</u>
Discounted Cash Flow Model (DCF) (1)	12.19 %
Risk Premium Model (RPM) (2)	12.64 %
Capital Asset Pricing Model (CAPM) (3)	<u>12.01 %</u>
	Mean <u><u>12.28 %</u></u>
	Median <u><u>12.19 %</u></u>
	Average of Mean and Median <u><u>12.24 %</u></u>

Notes:

- (1) From page 2 of this Schedule.
- (2) From page 4 of this Schedule.
- (3) From page 7 of this Schedule.

Northern States Power Company
DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the
Proxy Group of Fifty Non-Price Regulated Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Fifty Non-Price Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (1)
Agilent Technologies	0.51 %	11.50 %	13.00 %	53.30 %	25.93 %	0.57 %	26.50 %
Abbott Labs.	1.52	11.50	11.90	12.53	11.98	1.61	13.59
Analog Devices	1.66	8.50	12.30	13.52	11.44	1.75	13.19
Assurant Inc.	1.66	11.50	17.90	17.90	15.77	1.79	17.56
Smith (A.O.)	1.48	9.50	9.00	8.00	8.83	1.54	10.37
Air Products & Chem.	2.10	12.00	10.50	11.96	11.49	2.22	13.71
Brown-Forman 'B'	1.00	13.00	NA	8.44	10.72	1.05	11.77
Broadridge Fin'l	1.52	8.50	NA	11.80	10.15	1.60	11.75
Brady Corp.	1.61	7.50	7.00	7.00	7.17	1.66	8.83
CACI Int'l	-	13.50	5.40	1.44	6.78	-	NA
Cerner Corp.	1.11	9.00	12.30	11.81	11.04	1.18	12.22
Chemed Corp.	0.30	9.00	7.50	7.55	8.02	0.32	8.34
Cooper Cos.	0.01	14.50	10.00	10.00	11.50	0.02	11.52
CSW Industrials	0.49	11.50	NA	12.00	11.75	0.52	12.27
Quest Diagnostics	1.78	7.00	26.50	(8.60)	16.75	1.93	18.68
Dolby Labs.	0.89	9.50	13.00	16.00	12.83	0.95	13.78
Lauder (Estee)	0.66	11.00	11.30	18.71	13.67	0.71	14.38
Exponent, Inc.	0.80	12.00	NA	15.00	13.50	0.86	14.36
FactSet Research	0.94	9.50	8.00	6.29	7.93	0.98	8.91
Gentex Corp.	1.47	12.00	10.50	15.80	12.77	1.56	14.33
Hershey Co.	2.04	5.50	7.70	8.82	7.34	2.12	9.46
Ingredion Inc.	2.87	7.50	NA	1.90	4.70	2.93	7.63
Hunt (J.B.)	0.72	8.00	15.00	20.50	14.50	0.77	15.27
J&J Snack Foods	1.50	10.00	NA	6.00	8.00	1.56	9.56
Henry (Jack) & Assoc	1.08	9.50	11.00	9.64	10.05	1.14	11.19
L3Harris Technologie	1.81	NA	8.60	10.21	9.41	1.89	11.30
Lennox Int'l	1.11	9.00	NA	16.72	12.86	1.18	14.04
McCormick & Co.	1.57	6.00	6.80	6.50	6.43	1.62	8.05
Monster Beverage	-	11.50	14.70	14.85	13.68	-	NA
Altria Group	7.19	6.00	4.00	4.67	4.89	7.36	12.25
MSA Safety	1.08	6.50	NA	18.00	12.25	1.15	13.40
MSCI Inc.	0.73	16.00	NA	17.79	16.90	0.79	17.69
Motorola Solutions	1.27	7.00	9.00	13.73	9.91	1.33	11.24
Mettler-Toledo Int'l	-	12.00	17.00	17.80	15.60	-	NA
Northrop Grumman	1.72	7.00	9.00	6.66	7.55	1.78	9.33
Old Dominion Freight	0.30	9.50	22.70	22.70	18.30	0.33	18.63
Packaging Corp.	2.86	5.00	5.00	16.86	8.95	2.98	11.93
Post Holdings	-	9.50	NA	28.20	18.85	-	NA
Rollins, Inc.	0.88	11.50	NA	8.20	9.85	0.93	10.78
Service Corporation International	1.58	8.00	17.40	4.11	9.84	1.66	11.50
Sherwin-Williams	0.77	10.50	12.60	11.87	11.66	0.81	12.47
Selective Ins. Group	1.25	9.50	12.40	10.00	10.63	1.31	11.94
Sirius XM Holdings	0.91	31.50	12.20	10.05	17.92	0.99	18.91
Synopsys, Inc.	-	13.00	16.00	16.00	15.00	-	NA
Texas Instruments Inc.	2.16	8.50	9.30	10.00	9.27	2.26	11.53
AMERCO	-	13.50	NA	15.00	14.25	-	NA
UniFirst Corp.	0.45	5.50	NA	10.00	7.75	0.47	8.22
VeriSign Inc.	-	8.50	NA	8.00	8.25	-	NA
Waters Corp.	-	6.00	9.40	9.30	8.23	-	NA
Watsco, Inc.	2.77	8.00	NA	15.00	11.50	2.92	14.42
						Mean	12.78 %
						Median	12.08 %
						Average of Mean and Median	12.43 %
						Excl. 7% or less:	12.43 %

NA= Not Available
NMF= Not Meaningful Figure

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

Source of Information:

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

Northern States Power Company
 Indicated Common Equity Cost Rate Using the Two Growth Discounted Cash Flow Model for the
Proxy Group of Fifty Non-Price Regulated Companies

	[1]	[2]	[3]	[4]	[5]	[7]	[8]	[9]	[10]
Proxy Group of Fifty Non-Price Regulated Companies	Stock Price	Annualized Dividend	Dividend Yield (1)	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (2)	Adjusted Dividend Yield (3)	Indicated Common Equity Cost Rate (4)
Agilent Technologies	\$ 175.47	\$ 0.78	0.44 %	11.50 %	13.00 %	53.30 %	25.93 %	0.50 %	11.60 % (5)
Abbott Labs	126.37	1.80	1.42	11.50	11.90	12.53	11.98	1.51	13.49
Analog Devices	162.95	2.76	1.69	8.50	12.30	13.52	11.44	1.79	13.23
Assurant Inc	170.11	2.64	1.55	11.50	17.90	17.90	15.77	1.67	12.81 (5)
Smith (A.O.)	72.72	1.04	1.43	9.50	9.00	8.00	8.83	1.49	10.32
Air Products & Chem.	269.51	6.00	2.23	12.00	10.50	11.96	11.49	2.36	13.85
Brown-Forman 'B'	70.22	0.72	1.03	13.00	NA	8.44	10.72	1.09	11.81
Broadridge Fin'l	172.22	2.56	1.49	8.50	NA	11.80	10.15	1.57	11.72
Brady Corp.	53.33	0.88	1.65	7.50	7.00	7.00	7.17	1.71	12.24 (5)
CACI Int'l	257.54	-	-	13.50	5.40	1.44	6.78	0.00	NA
Cerner Corp.	76.35	0.88	1.15	9.00	12.30	11.81	11.04	1.21	12.25
Chemed Corp.	476.70	1.44	0.30	9.00	7.50	7.55	8.02	0.31	8.33
Cooper Cos.	450.71	0.06	0.01	14.50	10.00	10.00	11.50	0.01	11.51
CSW Industrials	132.79	0.60	0.45	11.50	NA	12.00	11.75	0.48	12.23
Quest Diagnostics	152.83	2.48	1.62	7.00	26.50	(8.60)	8.30	1.69	9.99
Dolby Labs	99.11	0.88	0.89	9.50	13.00	16.00	12.83	0.95	13.78
Lauder (Estee)	340.49	2.12	0.62	11.00	11.30	18.71	13.67	0.66	14.33
Exponent, Inc.	116.90	0.80	0.68	12.00	NA	15.00	13.50	0.73	14.23
FactSet Research	380.22	3.28	0.86	9.50	8.00	6.29	7.93	0.89	8.82
Gentex Corp.	30.80	0.48	1.56	12.00	10.50	15.80	12.77	1.66	14.43
Hershey Co.	177.70	3.60	2.03	5.50	7.70	8.82	7.34	2.10	9.44
Ingredion Inc.	87.86	2.56	2.91	7.50	NA	1.90	4.70	2.98	13.15 (5)
Hunt (J.B.)	177.40	1.20	0.68	8.00	15.00	20.50	14.50	0.73	15.23
J&J Snack Foods	163.76	2.53	1.55	10.00	NA	6.00	8.00	1.61	9.61
Henry (Jack) & Assoc	176.38	1.84	1.04	9.50	11.00	9.64	10.05	1.09	11.14
L3Harris Technologie	233.01	4.08	1.75	NA	8.60	10.21	9.41	1.83	11.24
Lennox Int'l	335.18	3.68	1.10	9.00	NA	16.72	12.86	1.17	14.03
McCormick & Co.	86.29	1.36	1.58	6.00	6.80	6.50	6.43	1.63	12.12 (5)
Monster Beverage	97.57	-	-	11.50	14.70	14.85	13.68	0.00	13.68
Altria Group	50.23	3.44	6.85	6.00	4.00	4.67	4.89	7.02	16.64 (5)
MSA Safety	162.84	1.76	1.08	6.50	NA	18.00	12.25	1.15	13.40
MSCI Inc.	634.58	4.16	0.66	16.00	NA	17.79	16.90	0.72	11.63 (5)
Motorola Solutions	244.22	2.84	1.16	7.00	9.00	13.73	9.91	1.22	11.13
Mettler-Toledo Int'l	1,552.83	-	-	12.00	17.00	17.80	15.60	0.00	NA
Northrop Grumman	367.70	6.28	1.71	7.00	9.00	6.66	7.55	1.77	9.32
Old Dominion Freight	288.72	0.80	0.28	9.50	22.70	22.70	18.30	0.31	11.11 (5)
Packaging Corp.	151.70	4.00	2.64	5.00	5.00	16.86	8.95	2.76	11.71
Post Holdings	111.91	-	-	9.50	NA	28.20	18.85	0.00	NA
Rollins, Inc.	38.92	0.32	0.82	11.50	NA	8.20	9.85	0.86	10.71
Service Corporation International	62.76	0.92	1.47	8.00	17.40	4.11	9.84	1.54	11.38
Sherwin-Williams	303.67	2.20	0.72	10.50	12.60	11.87	11.66	0.76	12.42
Selective Ins. Group	83.57	1.00	1.20	9.50	12.40	10.00	10.63	1.26	11.89
Sirius XM Holdings	6.27	0.06	0.93	31.50	12.20	10.05	17.92	1.01	12.09 (5)
Synopsys, Inc.	332.24	-	-	13.00	16.00	16.00	15.00	0.00	15.00
Texas Instruments Inc.	190.91	4.08	2.14	8.50	9.30	10.00	9.27	2.24	11.51
AMERCO	661.15	-	-	13.50	NA	15.00	14.25	0.00	14.25
UniFirst Corp.	229.07	1.00	0.44	5.50	NA	10.00	7.75	0.46	8.21
VeriSign Inc.	216.26	-	-	8.50	NA	8.00	8.25	0.00	8.25
Waters Corp.	414.02	-	-	6.00	9.40	9.30	8.23	0.00	8.23
Watco, Inc.	278.42	7.80	2.80	8.00	NA	6.30	7.15	2.90	13.34 (5)
						Average	11.23	Average	11.98 %
						1 Standard Deviation Below Mean	7.27		
						1 Standard Deviation Above Mean	15.20	Median	11.89 %
								Average of Mean and Median	11.94 %
								Excl. 7% or less:	11.94 %

NA= Not Available
 NMF= Not Meaningful Figure

Notes:

- (1) Indicated dividend at 08/31/2021 divided by the average closing price of the last 60 trading days ending 08/31/2021 for
- (2) Average of columns 4 through 7 excluding negative growth rates.
- (3) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 8) x column 3 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for Agilent Technologies, 0.44% x
- (4) Column 8 + column 9.
- (5) The Two Growth Method was applied to Companies with short-term EPS growth rates greater than one standard deviation from the overall Utility Proxy Group mean growth rate. The mean of all Utility Proxy Group Companies with growth rates are within one standard deviation of the overall mean growth rate was applied as the long-term growth rate for these Companies.

Source of Information:

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

Northern States Power Company
 Indicated Common Equity Cost Rate
 Through Use of a Risk Premium Model
Using an Adjusted Total Market Approach

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

Notes: (1) Average forecast of Baa2 corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated September 1, 2021 and June 1, 2021 (see pages 10 and 11 of Exhibit_(DWD-1), Schedule 6). The estimates are detailed below.

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

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

	A2 Corp. Bond Yield		Baa2 Corp. Bond Yield		Spread
Aug-2021	2.89 %		3.24 %		0.35 %
Jul-2021	2.89		3.24		0.35
Jun-2021	3.10		3.45		0.35
	Average yield spread				<u>0.35 %</u>
	1/3 of spread				<u><u>0.12 %</u></u>

(3) From page 5 of this Schedule.

Northern States Power Company
Comparison of Long-Term Issuer Ratings for the
Proxy Group of Fifty Non-Price Regulated Companies of Comparable risk to the
Proxy Group of Fifty Non-Price Regulated Companies

Proxy Group of Fifty Non-Price Regulated Companies	Moody's Long-Term Issuer Rating August 2021		Standard & Poor's Long-Term Issuer Rating August 2021	
	Long-Term Issuer Rating	Numerical Weighting (1)	Long-Term Issuer Rating	Numerical Weighting (1)
Agilent Technologies	Baa2	9.0	BBB+	8.0
Abbott Labs.	A2	6.0	A+	5.0
Analog Devices	Baa1	8.0	BBB+	8.0
Assurant Inc.	Baa3	10.0	BBB	9.0
Smith (A.O.)	NA	--	NA	--
Air Products & Chem.	A2	6.0	A	6.0
Brown-Forman 'B'	A1	5.0	A-	7.0
Broadridge Fin'l	Baa1	8.0	BBB+	8.0
Brady Corp.	NA	--	NA	--
CACI Int'l	NA	--	BB+	11.0
Cerner Corp.	NA	--	NA	--
Chemed Corp.	WR	--	NR	--
Cooper Cos.	WR	--	NR	--
CSW Industrials	NA	--	NA	--
Quest Diagnostics	Baa2	9.0	BBB+	8.0
Dolby Labs.	NA	--	NA	--
Lauder (Estee)	A1	5.0	A+	5.0
Exponent, Inc.	NA	--	NA	--
FactSet Research	NA	--	NA	--
Gentex Corp.	NA	--	NA	--
Hershey Co.	A1	5.0	A	6.0
Ingredion Inc.	Baa1	8.0	BBB	9.0
Hunt (J.B.)	Baa1	8.0	BBB+	8.0
J&J Snack Foods	NA	--	NA	--
Henry (Jack) & Assoc	NA	--	NA	--
L3Harris Technologie	Baa2	9.0	BBB	9.0
Lennox Int'l	Baa2	9.0	BBB	9.0
McCormick & Co.	Baa2	9.0	BBB	9.0
Monster Beverage	NA	--	NA	--
Altria Group	A3	7.0	BBB	9.0
MSA Safety	NA	--	NA	--
MSCI Inc.	Ba1	11.0	BB+	11.0
Motorola Solutions	Baa3	10.0	BBB-	10.0
Mettler-Toledo Int'l	WR	--	NR	--
Northrop Grumman	Baa1	8.0	BBB+	8.0
Old Dominion Freight	NA	--	NA	--
Packaging Corp.	Baa2	9.0	BBB	9.0
Post Holdings	B2	15.0	B+	14.0
Rollins, Inc.	NA	--	NA	--
Service Corporation International	Ba2	12.0	BB+	11.0
Sherwin-Williams	Baa2	9.0	BBB	9.0
Selective Ins. Group	Baa2	9.0	BBB	9.0
Sirius XM Holdings	NA	--	BB	12.0
Synopsys, Inc.	NA	--	NA	--
Texas Instruments Inc.	A1	5.0	A+	5.0
AMERCO	WR	--	NR	--
UniFirst Corp.	NA	--	NA	--
VeriSign Inc.	Baa3	10.0	BBB	9.0
Waters Corp.	NA	--	NA	--
Watsco, Inc.	NA	--	NA	--
Average	Baa1	8.4	BBB	8.6

Notes:

(1) From page 6 of Exhibit_(DWD-1), Schedule 6.

Source of Information:

Bloomberg Professional Services

Northern States Power Company
 Derivation of Equity Risk Premium Based on the Total Market Approach
 Using the Beta for
 Proxy Group of Fifty Non-Price Regulated Companies of Comparable risk to the
Proxy Group of Fifty Non-Price Regulated Companies

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Fifty Non-Price Regulated Companies</u>
<u>Ibbotson-Based Equity Risk Premiums:</u>		
1.	Ibbotson Equity Risk Premium (1)	5.92 %
2.	Regression on Ibbotson Risk Premium Data (2)	8.87
3.	Ibbotson Equity Risk Premium based on PRPM (3)	7.88
4.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (4)	5.53
5.	Equity Risk Premium Based on <u>Value Line</u> S&P 500 Companies (5)	11.64
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>14.76</u>
7.	Conclusion of Equity Risk Premium	9.10 %
8.	Adjusted Beta (7)	<u>0.93</u>
9.	Forecasted Equity Risk Premium	<u><u>8.46 %</u></u>

Notes:

- (1) From note 1 of page 9 of Exhibit_(DWD-1), Schedule 6.
- (2) From note 2 of page 9 of Exhibit_(DWD-1), Schedule 6.
- (3) From note 3 of page 9 of Exhibit_(DWD-1), Schedule 6.
- (4) From note 4 of page 9 of Exhibit_(DWD-1), Schedule 6.
- (5) From note 5 of page 9 of Exhibit_(DWD-1), Schedule 6.
- (6) From note 6 of page 9 of Exhibit_(DWD-1), Schedule 6.
- (7) Average of mean and median beta from page 7 of this Schedule.

Sources of Information:

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

Northern States Power Company
 Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the
Proxy Group of Fifty Non-Price Regulated Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fifty Non-Price Regulated Companies	Value Line Adjusted Beta	Bloomberg Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
Agilent Technologies	0.90	0.86	0.88	9.93 %	2.70 %	11.44 %	11.73 %	11.58 %
Abbott Labs.	0.90	0.84	0.87	9.93	2.70	11.34	11.66	11.50
Analog Devices	0.95	1.02	0.98	9.93	2.70	12.43	12.48	12.45
Assurant Inc.	0.90	1.01	0.95	9.93	2.70	12.13	12.25	12.19
Smith (A.O.)	0.85	1.00	0.93	9.93	2.70	11.93	12.11	12.02
Air Products & Chem.	0.90	0.90	0.90	9.93	2.70	11.63	11.88	11.76
Brown-Forman 'B'	0.90	0.97	0.93	9.93	2.70	11.93	12.11	12.02
Broadridge Fin'l	0.85	0.83	0.84	9.93	2.70	11.04	11.44	11.24
Brady Corp.	1.00	1.07	1.04	9.93	2.70	13.02	12.92	12.97
CACI Int'l	0.95	1.00	0.98	9.93	2.70	12.43	12.48	12.45
Cerner Corp.	0.90	0.89	0.89	9.93	2.70	11.53	11.81	11.67
Chemed Corp.	0.85	0.92	0.89	9.93	2.70	11.53	11.81	11.67
Cooper Cos.	0.95	0.94	0.95	9.93	2.70	12.13	12.25	12.19
CSW Industrials	0.90	1.05	0.98	9.93	2.70	12.43	12.48	12.45
Quest Diagnostics	0.80	0.97	0.88	9.93	2.70	11.44	11.73	11.58
Dolby Labs.	0.95	0.94	0.94	9.93	2.70	12.03	12.18	12.11
Lauder (Estee)	0.95	1.01	0.98	9.93	2.70	12.43	12.48	12.45
Exponent, Inc.	0.90	0.96	0.93	9.93	2.70	11.93	12.11	12.02
FactSet Research	1.00	0.98	0.99	9.93	2.70	12.53	12.55	12.54
Gentex Corp.	0.95	1.07	1.01	9.93	2.70	12.73	12.70	12.71
Hershey Co.	0.85	0.85	0.85	9.93	2.70	11.14	11.51	11.32
Ingredion Inc.	0.90	0.93	0.91	9.93	2.70	11.73	11.96	11.85
Hunt (J.B.)	0.95	0.94	0.94	9.93	2.70	12.03	12.18	12.11
J&J Snack Foods	0.95	0.81	0.88	9.93	2.70	11.44	11.73	11.58
Henry (Jack) & Assoc	0.85	0.88	0.87	9.93	2.70	11.34	11.66	11.50
L3Harris Technologie	1.00	1.00	1.00	9.93	2.70	12.63	12.63	12.63
Lennox Int'l	1.00	1.04	1.02	9.93	2.70	12.83	12.78	12.80
McCormick & Co.	0.80	0.70	0.75	9.93	2.70	10.15	10.77	10.46
Monster Beverage	0.85	0.97	0.91	9.93	2.70	11.73	11.96	11.85
Altria Group	0.95	0.91	0.93	9.93	2.70	11.93	12.11	12.02
MSA Safety	1.00	1.00	1.00	9.93	2.70	12.63	12.63	12.63
MSCI Inc.	0.95	0.93	0.94	9.93	2.70	12.03	12.18	12.11
Motorola Solutions	0.90	0.96	0.93	9.93	2.70	11.93	12.11	12.02
Mettler-Toledo Int'l	0.95	0.90	0.93	9.93	2.70	11.93	12.11	12.02
Northrop Grumman	0.85	0.79	0.82	9.93	2.70	10.84	11.29	11.06
Old Dominion Freight	0.90	0.98	0.94	9.93	2.70	12.03	12.18	12.11
Packaging Corp.	1.00	0.79	0.90	9.93	2.70	11.63	11.88	11.76
Post Holdings	0.95	0.90	0.92	9.93	2.70	11.83	12.03	11.93
Rollins, Inc.	0.85	0.69	0.77	9.93	2.70	10.34	10.91	10.63
Service Corporation International	0.95	1.08	1.02	9.93	2.70	12.83	12.78	12.80
Sherwin-Williams	0.95	0.99	0.97	9.93	2.70	12.33	12.40	12.37
Selective Ins. Group	0.90	0.99	0.94	9.93	2.70	12.03	12.18	12.11
Sirius XM Holdings	0.95	1.12	1.04	9.93	2.70	13.02	12.92	12.97
Synopsys, Inc.	0.95	1.02	0.98	9.93	2.70	12.43	12.48	12.45
Texas Instruments Inc.	0.85	0.89	0.87	9.93	2.70	11.34	11.66	11.50
AMERCO	0.95	1.08	1.01	9.93	2.70	12.73	12.70	12.71
UniFirst Corp.	0.95	1.13	1.04	9.93	2.70	13.02	12.92	12.97
VeriSign Inc.	0.90	0.77	0.84	9.93	2.70	11.04	11.44	11.24
Waters Corp.	0.95	0.85	0.90	9.93	2.70	11.63	11.88	11.76
Watsco, Inc.	0.85	0.80	0.83	9.93	2.70	10.94	11.36	11.15
Mean			<u>0.93</u>			<u>11.91 %</u>	<u>12.09 %</u>	<u>12.00 %</u>
Median			<u>0.93</u>			<u>11.93 %</u>	<u>12.11 %</u>	<u>12.02 %</u>
Average of Mean and Median			<u>0.93</u>			<u>11.92 %</u>	<u>12.10 %</u>	<u>12.01 %</u>

Notes:

- (1) From note 1 of page 2 of Exhibit (DWD-1), Schedule 7.
- (2) From note 2 of page 2 of Exhibit (DWD-1), Schedule 7.
- (3) Average of CAPM and ECAPM cost rates.

Northern States Power Company
 Derivation of Investment Risk Adjustment Based upon
 Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAQ

Line No.	[1] Market Capitalization on August 31, 2021 (1) (millions)	[2] Applicable Decile of the NYSE/AMEX/NASDAQ (2) (times larger)	[3] Applicable Size Premium (3)	[4] Spread from Applicable Size Premium (4)
1.	Northern States Power Company \$ 11,194.007	3	0.71%	
2.	Proxy Group of Thirteen Electric Companies \$ 15,189.501	1.4 x	0.49%	0.22%

Decile	[A]	[B]	[C]	[D]
Largest	1	2	3	4
	5	6	7	8
	9	10		
Smallest				

Decile	Market Capitalization of Smallest Company (millions)	Market Capitalization of Largest Company (millions)	Size Premium (Return in Excess of CAPM)*
1	\$ 29,025.803	\$ 1,966,078.882	-0.22%
2	13,178.743	28,808.073	0.49%
3	6,743.361	13,177.828	0.71%
4	3,861.858	6,710.676	0.75%
5	2,445.693	3,836.536	1.09%
6	1,591.865	2,444.745	1.37%
7	911.586	1,591.765	1.54%
8	451.955	911.103	1.46%
9	190.019	451.800	2.29%
10	2.194	189.831	5.01%

Notes:

- (1) From page 2 of this Schedule.
- (2) Gleaned from Columns [B] and [C] on the bottom of this page. The appropriate decile (Column [A]) corresponds to the market capitalization of the proxy group, which is found in Column [1].
- (3) Corresponding risk premium to the decile is provided in Column [D] on the bottom of this page.
- (4) Line No. 1 Column [3] - Line No. 2 Column [3]. For example, the 0.22% in Column [4], Line No. 2 is derived as follows 0.22% = 0.71% - 0.49%.

*From 2021 Duff & Phelps Cost of Capital Navigator

Northern States Power Company
 Market Capitalization of Northern States Power Company and the
 Proxy Group of Thirteen Electric Companies

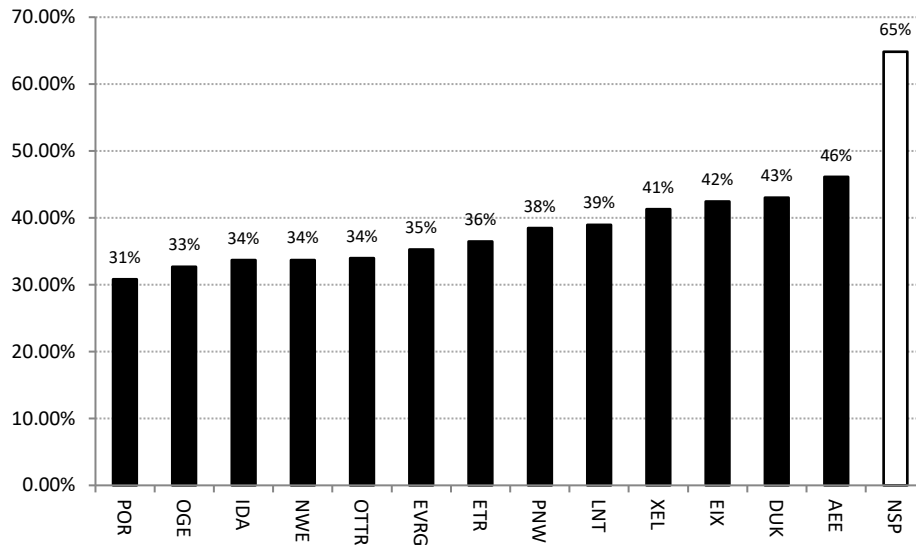
Company	[1] Common Stock Shares Outstanding at Fiscal Year End 2020 (millions)	[2] Book Value per Share at Fiscal Year End 2020 (1)	[3] Total Common Equity at Fiscal Year End 2020 (millions)	[4] Closing Stock Market Price on August 31, 2021	[5] Market-to- Book Ratio on August 31, 2021 (2)	[6] Market Capitalization on August 31, 2021 (3) (millions)
Northern States Power Company	NA	NA	5,740,516 (4)	NA	195.0 (5)	\$ 11,194,007 (6)
Based upon Proxy Group of Thirteen Electric Companies						
Proxy Group of Thirteen Electric Companies						
Alliant Energy Corporation	249,868	\$ 22.764	\$ 5,688,000	\$ 60.790	267.0 %	\$ 15,189,501
Ameren Corporation	253,355	35.279	8,938,000	87.720	248.6	22,224,310
Duke Energy Corporation	769,000	59.821	46,002,000	104.660	175.0	80,483,540
Edison International	378,907	37.075	14,048,000	57.840	156.0	21,915,989
Entergy Corporation	200,245	54.564	10,926,142	110.610	202.7	22,149,081
Eversource Energy, Inc.	226,837	38.501	8,733,400	68.450	177.8	15,526,970
IDACORP, Inc.	50,469	50.724	2,559,980	105.350	207.7	5,316,934
NorthWestern Corporation	54,145	38.399	2,079,095	63.600	165.6	3,443,608
OGE Energy Corporation	200,021	18.157	3,631,800	35.410	195.0	7,082,749
Otter Tail Corporation	41,470	21.002	870,966	54.870	261.3	2,275,452
Pinnacle West Capital Corporation	112,760	49.960	5,633,503	76.900	153.9	8,671,248
Portland General Electric Company	89,537	29.183	2,613,000	51.350	176.0	4,597,742
Xcel Energy, Inc.	537,438	27.119	14,575,000	68.750	253.5	36,948,890
Median	200,245	\$ 37.075	\$ 5,688,000	\$ 68.450	195.0 %	\$ 15,189,501

NA= Not Available

- Notes: (1) Column 3 / Column 1.
 (2) Column 4 / Column 2.
 (3) Column 1 * Column 4.

- (4) Requested rate base multiplied by the requested common equity ratio.
 (5) The market-to-book ratio of Northern States Power Company on August 31, 2021 is assumed to be equal to the market-to-book ratio of Proxy
 (6) Column [3] multiplied by Column [5].

Northern States Power Company
Comparison of Projected Capital Expenditures Relative to Net Plant



Sources of Information: Value Line
Company provided data

Northern States Power Company
 Derivation of the Flotation Cost Adjustment to the Cost of Common Equity

Equity Issuances

	[Column 1]	[Column 2]	[Column 3]	[Column 4]	[Column 5]	[Column 6]	[Column 7]	[Column 8]	[Column 9]	[Column 10]
	Transaction (1)	Market Price per Share (1)	Average Offering Price per Share (1)	Underwriting Discount (1)	Total Offering Expense per Share (1)	Net Proceeds per Share (2)	Total Flotation Costs (3)	Gross Equity Issue before Costs (4)	Net Proceeds (5)	Flotation Cost Percentage (6)
11/16/1949	Northern States Power	\$10.75	\$10.25	\$0.12	\$0.137	\$ 9,9890	\$ 1,205,605	\$ 17,030,559	\$ 15,824,953	7.079%
6/4/1952	Northern States Power	\$10.50	\$10.50	\$0.10	\$0.162	\$ 10,2400	\$ 288,331	\$ 11,644,143	\$ 11,355,812	2.476%
4/14/1954	Northern States Power	\$15.25	\$14.00	\$0.06	\$0.124	\$ 13,8160	\$ 1,749,274	\$ 18,602,804	\$ 16,853,530	9.403%
2/29/1956	Northern States Power	\$17.83	\$16.75	\$0.05	\$0.221	\$ 16,4790	\$ 903,058	\$ 11,959,149	\$ 11,056,091	7.551%
7/22/1959	Northern States Power	\$23.38	\$22.00	\$0.07	\$0.191	\$ 21,7400	\$ 1,556,574	\$ 22,253,771	\$ 20,697,197	6.995%
7/28/1965	Northern States Power	\$35.25	\$33.00	\$0.09	\$0.225	\$ 32,6830	\$ 1,981,745	\$ 27,213,282	\$ 25,231,537	7.282%
1/22/1969	Northern States Power	\$29.00	\$27.00	\$0.12	\$0.187	\$ 26,6940	\$ 2,492,350	\$ 31,343,519	\$ 28,851,169	7.952%
10/21/1970	Northern States Power	\$23.13	\$21.50	\$0.18	\$0.149	\$ 21,1760	\$ 3,370,402	\$ 39,990,016	\$ 36,619,614	8.428%
7/26/1972	Northern States Power	\$25.00	\$23.50	\$0.13	\$0.166	\$ 23,2050	\$ 3,414,499	\$ 47,555,700	\$ 44,141,201	7.180%
10/10/1973	Northern States Power	\$25.83	\$24.50	\$0.13	\$0.153	\$ 24,2190	\$ 3,360,476	\$ 54,037,547	\$ 50,677,071	6.219%
11/20/1974	Northern States Power	\$17.63	\$17.50	\$0.91	\$0.069	\$ 16,5210	\$ 2,539,200	\$ 40,537,500	\$ 37,998,300	6.264%
8/14/1975	Northern States Power	\$23.00	\$23.00	\$0.74	\$0.077	\$ 22,1830	\$ 1,429,750	\$ 40,250,000	\$ 38,820,250	3.552%
6/3/1976	Northern States Power	\$24.00	\$24.00	\$0.72	\$0.064	\$ 23,2160	\$ 1,568,000	\$ 48,000,000	\$ 46,432,000	3.267%
5/31/1993	Northern States Power	\$44.13	\$43.63	\$1.20	\$0.048	\$ 42,3770	\$ 5,317,337	\$ 134,226,264	\$ 128,908,927	3.961%
9/23/1997	Northern States Power	\$49.94	\$49.56	\$1.23	\$0.133	\$ 48,2000	\$ 7,821,000	\$ 224,721,000	\$ 216,900,000	3.480%
9/29/1997	Northern States Power	\$50.50	\$49.56	\$1.23	\$0.133	\$ 48,2000	\$ 920,000	\$ 20,200,000	\$ 19,280,000	4.554%
2/25/2002	Xcel Energy, Inc.	\$22.95	\$22.50	\$0.73	\$0.015	\$ 21,7550	\$ 23,900,000	\$ 459,000,000	\$ 435,100,000	5.207%
9/9/2008	Xcel Energy, Inc.	\$20.86	\$20.20	\$0.10	\$0.006	\$ 20,0937	\$ 13,218,352	\$ 359,835,000	\$ 346,616,648	3.673%
8/3/2010	Xcel Energy, Inc.	\$22.10	\$21.50	\$0.65	\$0.013	\$ 20,5710	\$ 33,407,927	\$ 482,885,000	\$ 449,477,073	6.918%
March 2013	Xcel Energy, Inc.	\$29.06	\$29.06	\$0.29	\$0.052	\$ 28,7143	\$ 2,657,558	\$ 225,407,642	\$ 222,750,085	1.179%
June 2014	Xcel Energy, Inc.	\$30.66	\$30.66	\$0.31	\$0.030	\$ 30,3264	\$ 1,915,210	\$ 174,592,340	\$ 172,677,130	1.097%
September 2018	Xcel Energy, Inc.	\$47.89	\$47.89	\$0.41	\$0.073	\$ 47,4054	\$ 2,271,040	\$ 226,661,287	\$ 224,390,247	1.002%
8/29/2019	Xcel Energy, Inc.	\$48.42	\$48.42	\$0.16	\$0.041	\$ 48,2147	\$ 1,886,029	\$ 453,132,797	\$ 451,246,767	0.416%
11/30/2020	Xcel Energy, Inc.	\$60.86	\$60.86	\$0.66	\$0.025	\$ 60,1750	\$ 8,168,737	\$ 720,941,187	\$ 712,772,450	1.133%
						\$ 3,892,020,508	\$ 127,342,454	\$ 3,892,020,508	\$ 3,764,678,054	3.272%

Proxy Group of
 Thirteen Electric
 Companies

Notes:

- (1) Company provided
- (2) Col. 3 - Col. 4 - Col. 5
- (3) (Col. 2 - Col. 6) x Col. 1
- (4) Col. 1 x Col. 2
- (5) Col. 1 x Col. 6
- (6) Col. 7 / Col. 8
- (7) Exhibit (DWD-1), Schedule 5
- (8) Col. 11 x (1 + 0.5 x Col. 12)
- (9) Col. 12 + Col. 13
- (10) (Col. 13 / (1 - Col. 10)) + Col. 12
- (11) Col. 15 - Col. 14

	[Column 11]	[Column 12]	[Column 13]	[Column 14]	[Column 15]	[Column 16]
	Average Dividend Yield (7)	Average Projected EPS Growth Rate (7)	Adjusted Dividend Yield (8)	Average DCF Cost Rate Unadjusted for Flotation (9)	DCF Cost Rate Adjusted for Flotation (10)	Flotation Cost Adjustment (11)
	3.49 %	5.20 %	3.58 %	8.78 %	8.90 %	0.12 %