# STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH 

DOCKET NO. W-354, SUB 400

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

IN THE MATTER OF
APPLICATION BY CAROLINA WATER SERVICE INC OF NORTH CAROLINA FOR AUTHORITY TO ADJUST AND INCREASE RATES AND CHARGES FOR WATER AND SEWER UTILITY SERVICE IN ALL SERVICE AREAS IN NORTH CAROLINA AND APPROVAL OF A THREE-YEAR WATER AND SEWER INVESTMENT PLAN

PREFILED REBUTTAL TESTIMONY OF
DYLAN W. D'ASCENDIS, CRRA, CVA PARTNER
SCOTTMADDEN, INC.

ON BEHALF OF
CAROLINA WATER SERVICE, INC. OF NORTH CAROLINA

November 10, 2022

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I. INTRODUCTION, PURPOSE, AND SUMMARY
Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
A. My name is Dylan W. D'Ascendis. I am employed by ScottMadden, Inc., as a 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 rebuttal testimony (referred to throughout as my "Rebuttal Testimony") before the North Carolina Utilities Commission ("Commission") on behalf of Carolina Water Services Inc. of North Carolina ("CWSNC" or the "Company").
Q. DID YOU FILE DIRECT TESTIMONY IN THIS PROCEEDING?
A. Yes, I did.
Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?
A. The purpose of my Rebuttal Testimony is two-fold; first, I update my analyses using market data as of October 14, 2022. Second, I respond to the Testimony of John R. Hinton ("Hinton Testimony") and the Joint Testimony of John R. Hinton, Charles M. Junis, Kuei Fen Sun, and Fenge Zhang ("Joint Testimony"), who testify on behalf of the Public Staff - North Carolina Utilities Commission ("Public Staff") as it relates to the Company's return on common equity ("ROE") in its North Carolina jurisdictional rate base.
Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.
A. My Rebuttal Testimony responds to the flaws in Mr. Hinton's determination of his recommended ROE. Specifically, I disagree with Mr. Hinton's applications of the discounted cash flow ("DCF") model and his risk premium model ("RPM"), his failure to reflect the Company's smaller size relative to his proxy group in his ROE recommendation, and his proposal to lower the Company's ROE 20 basis points if its requested water and sewer investment plan ("WSIP") is approved. I also respond to Mr. Hinton's critiques of my Direct Testimony.
Q. HAVE YOU PREPARED AN EXHIBIT IN SUPPORT OF YOUR RECOMMENDATION?
A. Yes. I have prepared D'Ascendis Rebuttal Exhibit No. 1, which contains Schedules DWD-1R through DWD-6R, which has been prepared by me or under my direction.

## II. UPDATED ANALYSES

Q. HAVE YOU UPDATED YOUR COST OF COMMON EQUITY ANALYSES FOR YOUR REBUTTAL TESTIMONY?
A. Yes, I have. Due to the passage of time since my Direct Testimony analysis (data as of May 13, 2022), I have updated my analysis using data as of October 14, 2022.
Q. HAVE YOU UPDATED YOUR UTILITY PROXY GROUP FOR YOUR UPDATED ANALYSES?
A. Yes, I have. The York Water Company is no longer covered by Value Line Investment Survey's ("Value Line") Standard edition. As such, I have eliminated them from my updated Utility Proxy Group.
Q. HAVE YOU APPLIED ANY OF YOUR ROE MODELS DIFFERENTLY IN YOUR UPDATED ANALYSES?
A. No, I have not.
Q. WHAT ARE THE RESULTS OF YOUR UPDATED ANALYSES?
A. Using data available as of October 14, 2022, my updated results are presented on page 2 of Exhibit DWD-1R and in Table 1, below.

Table 1: Updated Cost of Common Equity Results

|  | Using Current <br> Interest Rates | Using Projected <br> 2023 Interest <br> Rates | Using Projected <br> 2024 Interest <br> Rates | Using Projected <br> 2025 Interest <br> Rates |
| :--- | :---: | :---: | :---: | :---: |
| Discounted Cash Flow <br> Model | $10.12 \%$ | $10.12 \%$ | $10.12 \%$ | $10.12 \%$ |
| Risk Premium Model | $11.44 \%$ | $12.01 \%$ | $11.91 \%$ | $11.88 \%$ |
| Capital Asset Pricing <br> Model | $11.75 \%$ | $12.03 \%$ | $12.00 \%$ | $12.00 \%$ |
| Cost of Equity Models <br> Applied to Comparable <br> Risk, Non-Price <br> Regulated Companies | $\underline{11.81 \%}$ | $\underline{12.08 \%}$ | $\underline{12.02 \%}$ | $12.02 \%$ |
| Indicated Range | $10.47 \%-11.47 \%$ | $10.60 \%-11.60 \%$ | $10.57 \%-11.57 \%$ | $10.57 \%-11.57 \%$ |
| Size Adjustment | $0.10 \%$ | $0.10 \%$ | $0.10 \%$ | $0.10 \%$ |
| Indicated Range of <br> Common Equity Cost <br> Rates After Adjustment | $10.57 \%-11.57 \%$ | $10.70 \%-11.70 \%$ | $10.67 \%-11.67 \%$ | $10.67 \%-11.67 \%$ |

In view of the unadjusted and adjusted ranges of ROE, the Company maintains its requested ROE of $10.45 \%$ for the base year ("BY") and $10.70 \%$ for each of the forecasted test years ("FY"). Upon reviewing my updated results, two items became apparent: (1) the indicated results of my ROE models have generally increased from my analyses presented in my Direct Testimony, which is a directional indicator that the investor-required return has increased since my Direct Testimony, and (2) since the Company's requested ROEs of $10.45 \%$ for the BY and $10.70 \%$ for the FYs are at the bottom of my ranges of ROEs attributable to the Company (and in the case of the BY request below my indicated range of results), they are conservative measures of the Company's ROE at this time.
Q. DO ECONOMIC CONDITIONS INFLUENCE THE REQUIRED COST OF CAPITAL AND REQUIRED RETURN ON COMMON EQUITY?
A. Yes. The models used to estimate the cost of equity are meant to reflect, and therefore are influenced by, current and expected capital market conditions. Therefore, it is important to assess the reasonableness of any financial model's results in the context of observable market data.
Q. DOES YOUR UPDATED ROE ANALYSIS CONSIDER THE CURRENT CAPITAL MARKET ENVIRONMENT?
A. Yes, it does. From an analytical perspective, it is important that the inputs and assumptions used to arrive at a ROE recommendation, including assessments of capital market conditions, are consistent with the
recommendation itself. Although all analyses require an element of judgment, the application of that judgment must be made in the context of the quantitative and qualitative information available to the analyst and the capital market environment in which the analyses were undertaken.
Q. MR. HINTON SUMMARIZES THE COMPANY'S AUTHORIZED CAPITAL STRUCTURE AND RATES OF RETURN FOR ITS LAST FOUR RATE CASES ON PAGES 3 AND 4 OF HIS TESTIMONY. DO THOSE AUTHORIZED RETURNS REFLECT CAPITAL MARKET CONDITIONS AT THOSE PARTICULAR TIMES?
A. Yes, they do.
Q. WHAT ARE MARKET CONDITIONS NOW AS OPPOSED TO DURING

## THE COMPANY'S LAST FOUR RATE CASES?

A. Current capital market conditions are riskier now than during the Company's last four rate cases. On Table 2, below, I have compared several measures of risk throughout each of the Company's last four rate cases. They are (1) proxy group average beta; (2) Fed Funds rate; (3) Average 30-year Treasury bond yield; (4) the Coefficient of Variation ("CoV") of 30-year Treasury bonds during the proceeding;1 (5) Average A-rated public utility bond yields; (6) the CoV of A-rated utility bond yields; (7) Average inflation rate; (8) the annualized volatility ${ }^{2}$ of the Utility Proxy Group; (9) the

[^0]annualized volatility of the S\&P 500; and (10) the average level of the Chicago Board of Exchange's Volatility Index, or VIX.

Table 2: Comparison of Risk Measures During the Pendency of the Company's Last Four Rate Cases and the Instant Proceeding ${ }^{3}$

|  | Sub 356 | Sub 360 | Sub 364 | Sub 384 | Sub 400 |
| :--- | :---: | :---: | :---: | :---: | :---: |
| Average Beta | 0.73 | 0.71 | 0.66 | 0.78 | 0.78 |
| Fed Funds rate | $0.75 \%-$ | $1.50 \%-$ | $0.00 \%-$ | $0.00 \%-$ | $1.50 \%-$ |
| $1.25 \%$ | $2.50 \%$ | $2.50 \%$ | $0.25 \%$ | $4.00 \%$ |  |
| Average 30-year <br> Treasury yield | $2.86 \%$ | $3.13 \%$ | $2.14 \%$ | $2.06 \%$ | $3.33 \%$ |
| CoV of 30-year Treasury <br> bond | $1.95 \%$ | $2.24 \%$ | $5.79 \%$ | $4.36 \%$ | $4.13 \%$ |
| Moody's A-Rated Utility <br> bond Yield | $3.97 \%$ | $4.34 \%$ | $3.39 \%$ | $3.25 \%$ | $5.04 \%$ |
| CoV of Moody's A-Rated <br> Utility bond | $1.35 \%$ | $1.27 \%$ | $3.32 \%$ | $3.03 \%$ | $3.17 \%$ |
| Average Inflation rate <br> (CPI) | $1.96 \%$ | $2.32 \%$ | $1.96 \%$ | $6.67 \%$ | $8.32 \%$ |
| Annualized Proxy Group <br> Volatility | $19.97 \%$ | $23.25 \%$ | $47.61 \%$ | $23.31 \%$ | $26.66 \%$ |
| Annualized S\&P500 <br> Volatility | $6.77 \%$ | $15.97 \%$ | $34.03 \%$ | $15.97 \%$ | $23.03 \%$ |
| VIX Index | 10.99 | 16.47 | 20.25 | 20.92 | 25.65 |

As show in Table 2, current measures of beta, the Fed Funds target rate, 30-year Treasury bond yields, A-rated public utility bond yields, the level of VIX, and the Consumer Price Index ("CPI") are all the highest of the five most recent Company rate cases, indicating higher risk. The increase in risk, and resultant investor required return from last rate case is also reflected in Mr. Hinton's recommended ROE. In Sub 384, Mr. Hinton recommended an ROE of $8.93 \%$, over 50 basis points lower than his present ROE recommendation of $9.45 \%$.
${ }^{3}$ Source: Federal Reserve Data Download Program, Bloomberg Professional Services, Value Line Investment Survey
Q. PLEASE SUMMARIZE THE CURRENT CAPITAL MARKET ENVIRONMENT FROM WHICH YOUR UPDATED ANALYSIS IS BASED.
A. The economy is currently in an inflationary environment, as evidenced by increased levels of the CPI as compared to the Federal Reserve's ("Fed") traditional inflation target of $2.00 \%$. Inflation can be characterized as an imbalance of supply and demand in the economy, specifically, when demand is in excess of supply. When demand is in excess of supply, the cost of goods and services increase.

Part of the Fed's Congressional mandate is to mitigate inflation and they have two main tools to achieve their mandate: (1) raising the Fed Funds Rate; or (2) decreasing the size of their balance sheet. In Fed Chairman Jerome H. Powell's Press Conference on November 2, 2022, he indicated that the Fed has the resolve to use both tools to restore price stability on behalf of American families and businesses. ${ }^{4}$

Overall, the current market environment can be summarized as one with increasing inflation ${ }^{5}$, and expectations are that the Fed will implement both of its tools in an attempt to limit inflation.

[^1]Rebuttal Testimony of Dylan W. D'Ascendis

## Q. HAS THE CPI RISEN RECENTLY?

A. Yes, it has. As shown on Chart 1, the CPI has increased exponentially since the beginning of the pandemic, and more recently has experienced year-over-year increases not seen since the early 1980s. ${ }^{6}$

Chart 1: Consumer Price Index Change, 1978-Current ${ }^{7}$


Further, looking to other measures of inflation such as the Personal Consumption Expenditures Index, both with and without food and energy costs, recent quarterly increases also are the highest they have been since the 1980s. ${ }^{8}$

6 Source: Bureau of Labor Statistics, Series Title: All items in U.S. city average, all urban consumers, seasonally adjusted, Series ID: CUSR0000SA0 (https://data.bls.gov/timeseries/CUSR0000SA0?output_view=pct_1mth).
7 Source: Bureau of Labor Statistics, Series Title: All items in U.S. city average, all urban consumers, seasonally adjusted, Series ID: CUSR0000SA0
(https://data.bls.gov/timeseries/CUSR0000SA0?output view=pct 1mth).
8 Bureau of Economic Analysis. Table 2.3.4. Price Indexes for Personal Consumption Expenditures by Major Type of Product
(https://apps.bea.gov/iTable/iTable.cfm?reqid=19\&step=2\#reqid=19\&step=2\&isuri=1\&192 1=survey)

Rebuttal Testimony of Dylan W. D'Ascendis

Chart 2: Personal Consumption Expenditures Index Change,
1978-Current


Given the rise in these measures as shown in Charts $1 \& 2$, even if inflation were to moderate to a degree, it would still remain significantly elevated compared to the last several years and the Fed's inflation target of 2.00\%.
Q. IS INFLATION EXPECTED TO MODERATE TOWARDS THE FED'S TARGET OF 2.00\% IN THE LONG TERM?
A. Yes, it is. In response to market conditions and Fed action, the 10- and 30year breakeven inflation rates, ${ }^{9}$ represented as the 10 -year and 30 -year Treasury Inflation-Protected Securities ("TIPS") spreads are $2.41 \%$ and $2.33 \%$ as of October 14, 2022. These data are consistent with Mr. Powell's

9 The breakeven inflation rate is the market's determination of the level of inflation during the period it measures. For example, the 10-year breakeven inflation rate is the market's expectation of inflation over the next ten years.
statements in his November 2, 2022 press conference. Discussing the anchoring ${ }^{10}$ of long-term inflation expectations, he warns: "But that [TIPS spreads] is not grounds for complacency; the longer the current bout of high inflation continues, the greater the chance that expectations of higher inflation will become entrenched."11

Market-based inflation expectations like the breakeven inflation rate are important benchmarks for the Fed. Michelle W. Bowman, Member of the Board of Governors of the Federal Reserve System noted that:

One important factor that we often point to in driving today's spending decisions and inflation outlook are expectations of future inflation. Near-term expectations tend to rise as current inflation increases, but when inflation expectations over the longer-term the next 5 to 10 years - begin to rise, it may indicate that consumers and businesses have less confidence in the Fed's ability to address higher inflation and return it to the Federal Open Market Committee's (FOMC) goal of 2 percent. If expectations move significantly above our 2 percent goal, it would make it more difficult to change people's perceptions about the duration of high inflation and potentially more difficult to get inflation under control. ${ }^{12}$
Q. HAS MR. POWELL DESCRIBED THE FED'S APPROACH TO BRING INFLATION BACK TO ITS 2.00\% TARGET?
A. Yes, he has. During his press conference on November 2, 2022 Mr. Powell stated:

10 Anchoring of inflation expectations is characterized as the market's belief (as shown in market data) that inflation rates will normalize toward the Fed's target of $2.00 \%$.
11 Transcript of Chair Powell's Press Conference, November 2, 2022. [clarification added] Michelle W. Bowman, "The Outlook for Inflation and Monetary Policy", At "Executive Officers Conference Massachusetts Bankers Association", Harwich, Massachusetts, June 23, 2022.

My colleagues and I are strongly committed to bringing inflation back down to our 2 percent goal. We have both the tools that we need and the resolve it will take to restore price stability on behalf of American families and businesses.

At some point, as l've said in the last two press conferences, it will become appropriate to slow the pace of increases, as we approach the level of interest rates that will be sufficiently restrictive to bring inflation down to our 2 percent goal. There is significant uncertainty around that level of interest rates. Even so, we still have some ways to go, and incoming data since our last meeting suggest that the ultimate level of interest rates will be higher than previously expected.

We are taking forceful steps to moderate demand so that it comes into better alignment with supply. Our overarching focus is using our tools to bring inflation back down to our 2 percent goal and to keep longerterm inflation expectations well anchored. Reducing inflation is likely to require a sustained period of belowtrend growth and some softening of labor market conditions. Restoring price stability is essential to set the stage for achieving maximum employment and stable prices in the longer run. The historical record
cautions strongly against prematurely loosening policy.
We will stay the course, until the job is done ${ }^{13}$
As can be gleaned from statements by members of the Fed, they expect inflation to continue well into next year and they will continue to use the tools at their disposal to support the economy and the labor market, including accelerating the pace of rate increases of the Fed Funds Rate and the roll off of assets from its balance sheet.
Q. IS THE MARKET CURRENTLY PRICING EXPECTATIONS OF SIGNIFICANT FUTURE FED FUNDS RATE INCREASES IN LINE WITH THE FED'S STATEMENTS?
A. Yes. The CME FedWatch Tool, as presented in Chart 3 below, indicates that investors are pricing a Fed Funds Rate in excess of $4.50 \%$ through the Fed's December 2023 meeting, as compared to the current level of the Fed Funds Rate between 3.75\% and 4.00\% as of November 2, 2022.

[^2]
## Chart 3：CME FedWatch Tool－Expected Fed Funds Rate Through

 December 2023 Meeting ${ }^{14}$

## Q．HOW DOES THE CURRENT INFLATIONARY ENVIRONMENT AFFECT

 AUTHORIZED ROES AND INTEREST RATES？A．Increasing inflation drives all costs higher（e．g．，prices for materials，labor， capital）．This is an economic reality that affects companies across the board and CWSNC is not immune to such increases．As a result，among other impacts inflation has on a utility＇s cost of service，higher inflation increases risk，and hence，the investor－required return for utility investors．

Q．PLEASE SUMMARIZE YOUR OBSERVATIONS OF THE CURRENT MARKET ENVIRONMENT．

A．In response to the current inflationary environment，the Fed recently raised the Fed Funds Rate and anticipates additional increases over the next year

14 Source：https：／／www．cmegroup．com／trading／interest－rates／countdown－to－fomc．html， accessed November 2， 2022.

Rebuttal Testimony of Dylan W．D’Ascendis
in addition to rolling off of assets from their balance sheet. Regardless of current and future actions of the Fed, it has acknowledged that inflation is higher than its target average level of $2.00 \%$ and will continue to run higher than that target.

Utilities are not immune from those inflationary pressures which will lead to an increased level of risk, and a higher investor-required return for utility investors.
III. RESPONSE TO PUBLIC STAFF WITNESS HINTON
Q. PLEASE SUMMARIZE MR. HINTON'S RECOMMENDATIONS.
A. Mr. Hinton accepts the Company's proposed capital structure, which consists of $50.00 \%$ long-term debt and $50.00 \%$ common equity. ${ }^{15} \mathrm{Mr}$. Hinton also accepts the Company's proposed long-term debt cost rate of 4.64\%. ${ }^{16}$ Mr. Hinton has two recommended ROEs, depending on whether the Company's requested WSIP is approved by the Commission. If the WSIP is not approved, Mr. Hinton's recommended ROE is $9.45 \% .{ }^{17}$ If the Company's WSIP is approved, Mr. Hinton's recommended ROE is $9.25 \% .{ }^{18}$

## Q. DO YOU HAVE ANY GENERAL COMMENTS ON MR. HINTON'S

 RECOMMENDED ROE?A. There are some areas in which Mr. Hinton and I agree. For example, we both accept the Company's proposed capital structure and debt cost rate,

[^3]Rebuttal Testimony of Dylan W. D’Ascendis
and we both rely on the DCF model and RPM in our analyses. However, there are areas in which we disagree. As will be discussed below, I disagree with (1) his application of the DCF model; (2) his application of the RPM; (3) his failure to reflect the Company's smaller size relative to his proxy group; and (4) his recommended 20-basis-point deduction to his recommended ROE.

## A. DISCOUNTED CASH FLOW MODEL

Q. PLEASE SUMMARIZE MR HINTON'S DCF ANALYSIS.
A. Mr. Hinton calculated his dividend yield by using the Value Line estimate of the 12-month projected dividend yield for each of his proxy companies as reported in the Value Line Summary and Index for the 13 weeks ended October 7, 2022. ${ }^{19}$ He then added the average expected dividend yield of $1.87 \%$ to a range of growth rates from $6.73 \%$ to $7.48 \%$ to arrive at indicated DCF cost rates from $8.60 \%$ to $9.35 \%$. From these indicated cost rates, he averaged all of them together for his historical \& forecasted growth rate DCF cost rate of $9.05 \%$, averaged all of his indicated DCF cost rates using projected measures of growth for his predicted growth rate DCF cost rate of $8.60 \%$, and then averaged all of his indicated DCF cost rates using historical measures of growth for his historical growth rate DCF cost rate of $9.35 \%{ }^{20}$

19 Hinton Testimony, at 29.
Q. PLEASE COMMENT ON MR. HINTON'S GROWTH RATE ANALYSIS IN HIS APPLICATION OF THE DCF MODEL.
A. Mr. Hinton states on pages 30-31 of his testimony that he employed EPS, dividends ("DPS"), and book value of equity per share ("BVPS") growth rates as reported in Value Line, both five- and ten-year historical and forecasted, and the five-year projected EPS growth rate as reported by Yahoo! Finance. He includes both historical and forecasted growth rates, "because it is reasonable to expect that investors consider both sets of data in deriving their expectations".

As will be discussed below, there is a significant body of empirical evidence supporting the superiority of analysts' EPS growth rates in a DCF analysis, indicating that analysts' forecasts of earnings remain the best predictor of growth to use in the DCF model. Such ample evidence of the proven reliability and superiority of analysts' forecasts of EPS should not be dismissed by Mr. Hinton.
Q. PLEASE DESCRIBE SOME OF THE EVIDENCE SUPPORTING THE RELIABILITY AND SUPERIORITY OF ANALYSTS' EPS GROWTH RATES IN A DCF ANALYSIS.
A. As discussed in my Direct Testimony, ${ }^{21}$ over the long run there can be no growth in DPS without growth in EPS. Security analysts' earnings expectations have a more significant, but not the only, influence on market

21 D'Ascendis Direct Testimony, at 32.
Rebuttal Testimony of Dylan W. D'Ascendis
prices than dividend expectations. Thus, the use of projected EPS growth rates in a DCF analysis provides a better match between investors' market price appreciation expectations and the growth rate component of the DCF, because they have a significant influence on market prices and the appreciation or "growth" experienced by investors. ${ }^{22}$ This should be evident even to relatively unsophisticated investors by listening to financial news reports on radio, TV, or reading newspapers.

In addition, Myron Gordon, the "father" of the standard regulatory version of the DCF model widely utilized throughout the United States in rate base/rate of return regulation, recognized the significance of analysts' forecasts of growth in EPS in a speech he gave in March 1990 before the Institute for Quantitative Research and Finance ${ }^{23}$, stating on page 12:

We have seen that earnings and growth estimates by security analysts were found by Malkiel and Cragg to be superior to data obtained from financial statements for the explanation of variation in price among common stocks... estimates by security analysts available from sources such as IBES are far superior to the data available to Malkiel and Cragg.

Eq (7) is not as elegant as Eq (4), but it has a good deal more intuitive appeal. It says that investors buy earnings, but what they will pay for a dollar of earnings increases with the extent to which the earnings are
${ }^{22}$ Roger A. Morin, Modern Regulatory Finance, Public Utilities Reports, Inc., 2021, at 373380. ("Morin")
${ }^{23}$ Myron J. Gordon, The Pricing of Common Stock, Presented before the Spring 1990 Seminar, March 27, 1990, of the Institute for Quantitative Research in Finance, Palm Beach, FL.
reflected in the dividend or in appreciation through growth．

Professor Gordon recognized that the total return is largely affected by the terminal price，which is mostly affected by earnings（hence price／earnings（＂P／E＂）multiples）．

Studies performed by Cragg and Malkiel ${ }^{24}$ demonstrate that analysts＇forecasts are superior to historical growth rate extrapolations． While some question the accuracy of analysts＇forecasts of EPS growth，the level of accuracy of those analysts＇forecasts well after the fact does not really matter．What is important is the forecasts reflect widely held expectations influencing investors at the time they make their pricing decisions，and hence，the market prices they pay．

In addition，Jeremy J．Siegel also supports the use of security analysts＇EPS growth forecasts when he states：

For the equity holder，the source of future cash flows is the earnings of firms．（p．90）

Some people argue that shareholders most value stocks＇cash dividends．But this is not necessarily true． （p．91）

Since the price of a stock depends primarily on the present discounted value of all expected future dividends，it appears that dividend policy is crucial to

24 John G．Cragg and Burton G．Malkiel，Expectations and the Structure of Share Prices （University of Chicago Press，1982）Chapter 4.
determining the value of the stock. However, this is not generally true. (p. 92)

Since stock prices are the present value of future dividends, it would seem natural to assume that economic growth would be an important factor influencing future dividends and hence stock prices. However, this is not necessarily so. The determinants of stock prices are earnings and dividends on a pershare basis. Although economic growth may influence aggregate earnings and dividends favorably, economic growth does not necessarily increase the growth of per-share earnings or dividends. It is earnings per share (EPS) that is important to Wall Street because per-share data, not aggregate earnings or dividends, are the basis of investor returns. (italics in original) (pp. $93-94)^{25}$

In view of the above, given the overwhelming academic and empirical support regarding the superiority of security analysts' EPS growth rate forecasts, such EPS growth rate projections should have been relied on by Mr. Hinton in his DCF analysis.
Q. IN REVIEWING THE FINANCIAL LITERATURE, DID YOU DISCOVER ANY PUBLICATIONS THAT SUPPORTED THE USE OF PROJECTED DPS OR BVPS GROWTH RATES FOR USE IN A DCF MODEL?
A. No, I did not.

25 Jeremy J. Siegel, Stocks for the Long Run - The Definitive Guide to Financial Market Returns and Long-Term Investment Strategies, McGraw-Hill 2002, pp. 90-94.
Q. LIKEWISE, ARE YOU AWARE OF ANY SOURCES OF DATA WHICH PROVIDE PROJECTED DPS OR BVPS GROWTH RATES TO INVESTORS?
A. Value Line is the only widespread, readily available source of which I am aware that publishes projected DPS and BVPS growth rates. If investors indeed valued projected DPS and BVPS growth rates, there would be a market for those data. As they are not relied on by investors to determine their required returns on investments, there is not. Conversely, projected EPS growth rates are widely available to investors.
Q. WHAT WOULD MR. HINTON'S DCF RESULT BE HAD HE ONLY RELIED ON EPS GROWTH FORECASTS?
A. As shown on Schedule DWD-2R, when looking at individual company results and the average of Value Line and Yahoo! Finance projected EPS growth rates the mean and median DCF model results are $10.0 \%$ and $10.8 \%$, respectively. In view of these indicated results, Mr. Hinton's indicated DCF cost rate of $9.00 \%$ is severely understated.
Q. IN SCHEDULE DWD-2R, YOU ELIMINATE INDIVIDUAL INDICATED ROES LESS THAN THE YIELD ON A-RATED UTILITY BONDS, WHICH

## IS CURRENTLY 5.26\%. ${ }^{26}$ IS ELIMINATING THESE INDICATED ROES CONSISTENT WITH BASIC FINANCIAL PRECEPTS?

A. Yes, it is. Yields on debt exceeding the investor required return on equity violates the fundamental financial principle of risk and return, namely that investors require greater returns for bearing greater risk. Because common equity capital has greater investment risk than debt capital, as common equity shareholders are behind debt holders in any claim on a company's assets and earnings, any indicated ROE that is below the yield on long-term debt is non-sensical and should be eliminated.

## B. APPLICATION OF THE RISK PREMIUM MODEL

Q. PLEASE SUMMARIZE MR. HINTON'S RPM.
A. Mr. Hinton's RPM estimates the relationship between average allowed equity returns for water utilities published by Regulatory Research Associates, Inc. ("RRA") and annual average Moody's Investor Service ("Moody's") A-rated utility bond yields. Using data from the years 2009 through 2022, Mr. Hinton conducts a regression analysis, which he then combines with recent monthly yields on Moody's A-rated public utility bonds, to develop his risk premium estimate of $5.09 \%$ and a corresponding ROE of $9.88 \%{ }^{27}$

[^4]Q. DO YOU HAVE ANY CONCERNS REGARDING MR. HINTON'S APPLICATION OF THE RPM?
A. Yes, I do. While I agree with Mr. Hinton's methodology (i.e., regression analysis of historical equity risk premiums), I disagree with (1) his exclusive use of current interest rates; (2) his use of annual average return data instead of individual rate case data; and (3) his use of a subset of rate case data instead of the entire RRA water rate case database.
Q. DO YOU BELIEVE THAT MR. HINTON SHOULD RELY EXCLUSIVELY ON CURRENT INTEREST RATES IN THE APPLICATION OF HIS RPM?
A. No. Because both cost of capital and ratemaking are prospective in nature, Mr. Hinton should also consider using projected interest rates in his RPM. The cost of capital, including the cost rate of common equity, is expectational in that it reflects investors' expectations of future capital markets, including an expectation of interest rate levels, as well as future risks. Ratemaking is prospective in that the rates set in this proceeding will be in effect for a period in the future.

Even though Mr. Hinton relies, in part, on projected growth rates in his DCF analyses, noting that growth in the DCF is expected, stating "I include both known historical growth rates and forecasted growth rates because it is reasonable to expect that investors consider both sets of data
in deriving their expectations." ${ }^{28}$ Despite this statement, he fails to consider projected measure of interest rates in his RPM analysis.
Q. MR. HINTON STATES THAT HE DOES NOT BELIEVE INTEREST RATE FORECASTS ARE RELIABLE IN DETERMINING THE ROE BECAUSE THEY DO NOT MATERIALIZE AS EXPECTED ${ }^{29}$. PLEASE RESPOND.
A. Whether Mr. Hinton believes those forecasts will prove to be accurate is irrelevant to estimating the market-required cost of common equity. Published industry forecasts, such as Blue Chip Financial Forecasts' ("Blue Chip") consensus interest rate projections, reflect industry expectations. Additionally, investors' expectations are not improper inputs to cost of common equity estimation models simply because prior projections were not proven correct in hindsight. As the Federal Energy Regulatory Commission ("FERC") noted in Opinion No. 531, "the cost of common equity to a regulated enterprise depends upon what the market expects, not upon what ultimately happens." ${ }^{30}$ Because our analyses are predicated on market expectations, the expected increase in bond yields is a measurable, observable, and relevant data point that should be reflected in Mr. Hinton's analysis. Therefore, Mr. Hinton should have considered forecasted interest rates in his analysis.

[^5]Q. ARE CURRENT INTEREST RATES ACCURATE PREDICTORS OF FUTURE INTEREST RATES?
A. No, they are not. Current interest rates are not proven to be a better predictor of future interest rates than predicted interest rates. In Chart 4 (below) I compare actual monthly yields to the three-month yield average from twelve months prior. This chart demonstrates that current Treasury yields have not been accurate predictors of future yields. Those results make intuitive sense. With the recent market dislocation, Treasury yields have decreased significantly and have been volatile. As interest rates decreased, historical Treasury yields over-projected current yields. As interest rates subsequently increased, the opposite was true.

Chart 4: Forecast Error of Three-Month Average Treasury Yields ${ }^{31}$

Q. DO YOU AGREE WITH MR. HINTON'S USE OF ANNUAL AUTHORIZED RETURNS AND INTEREST RATE DATA IN HIS RPM?
A. No, I do not. Instead of using yearly average authorized returns and Moody's A-rated public utility bond yields, it is preferable to use the authorized returns and Moody's A-rated public utility bond yields on a case-by-case basis. One reason why one should use individual cases instead of an annual average is that some years have more rate case decisions than others, and years with less rate case decisions will garner unnecessary weight. Another reason to use individual cases over an annual average is that interest rates and market conditions change during the year (e.g., the beginning and end of 2020), if one uses annual average authorized returns and annual average interest rates, the fluctuation between the interest rates and equity risk premiums during the year are lost.
Q. DO YOU AGREE WITH MR. HINTON'S USE OF AUTHORIZED ROES FOR THE PERIOD 2009-2022 WHEN RATE CASE DATA FROM THE PERIOD 2006-2022 IS AVAILABLE?
A. No, I do not. Kroll's 2022 SBBI® Yearbook ("SBBI - 2022") makes it clear that the arbitrary selection of historical periods is highly suspect and unlikely to be representative of long-term trends in market data. For example, $\underline{\text { SBBI }}$ - 2022 states:

The estimate of the equity risk premium depends on the length of the data series studied. A proper estimate of the equity risk premium requires a data series long enough to give a reliable average without being unduly influenced by very good and
very poor short-term returns. When calculated using a long data series, the historical equity risk premium is relatively stable. Furthermore, because an average of the realized equity risk premium, is quite volatile when calculated using a short history, using a long series makes it less likely that the analyst can justify any number he or she wants. ${ }^{32}$

Given the above, Mr. Hinton should have used the entire dataset provided by Regulatory Research Associates.
Q. WHAT IS THE RESULT OF THE REGRESSION ANALYSIS AFTER REFLECTING A PROSPECTIVE MOODY'S A-RATED PUBLIC UTILITY BOND YIELD AND USING INDIVIDUAL RATE CASE DATA IN PLACE OF ANNUAL RATE CASE DATA?
A. The range of RPM results reflecting the consideration of projected interest rates and individual rate case results for the period 2006-2022 is from $9.88 \%$ (using current interest rates) and $10.12 \%$ (using projected interest rates). As shown on Schedule DWD-3R, the analysis is based on a regression of 194 rate cases for water utility companies from August 2006 through May 2022. It shows the implicit equity risk premium relative to the yields on Moody's A-rated public utility bonds immediately prior to the issuance of each regulatory decision. ${ }^{33}$

I determined the appropriate prospective Moody's A-rated public utility yield by relying on a consensus forecast of about 50 economists of the
$32 \quad$ SBBI - 2022 at 201-202.
33
If the Order was in the first half of the month, the Moody's A-rated utility bond from two months prior would be used. If the Order was in the second half of the month, the Moody's A-rated public utility bond from the last prior month was used.
expected yield on Moody＇s Aaa－rated corporate bonds for the six calendar quarters ending with the first calendar quarter of 2024 ，and Blue Chip＇s long－ term projections for 2024 to 2028，and 2029 to $2033 .{ }^{34}$ As described on page 2 of Schedule DWD－3R，the average expected yield on Moody＇s Aaa－ rated corporate bonds is $5.18 \%$ ．I then derived an expected yield on Moody＇s A2－rated public utility bonds，by making an upward adjustment of $0.70 \%$ ，which represents a recent spread between Moody＇s Aaa－rated corporate bonds and Moody＇s A2－rated public utility bonds．Adding the recent $0.70 \%$ spread to the expected Moody＇s Aaa－rated corporate bond yield of $5.18 \%$ results in an expected Moody＇s A2－rated public utility bond yield of $5.88 \%$ ．

I then used the regression results to estimate the equity risk premium applicable to the both the projected yield and current yields on Moody＇s A2－ rated public utility bonds of $5.88 \%$ and $4.93 \%$ ，respectively．Given the expected Moody＇s A－rated utility bond yield of $5.88 \%$ ，the indicated equity risk premium is $4.24 \%$ ，which results in an indicated ROE of $10.12 \%$ ，as shown on Schedule DWD－3R．Also shown on Schedule DWD－3R，using a current three－month average Moody＇s A－rated Utility bond yield of 4．93\％， the indicated ROE using the RPM is $9.88 \%$ ．
${ }^{34} \quad$ Blue Chip Financial Forecasts，September 30，2022，at 2，June 1，2022，at 14.
Rebuttal Testimony of Dylan W．D＇Ascendis

## C. COMPARABLE EARNINGS ANALYSIS

Q. DID MR. HINTON INCLUDE A COMPARABLE EARNINGS MODEL ("CEM") ANALYSIS?
A. No. Despite the fact that in at least two recent rate cases, Docket No. G-9, Sub 781 Re: Piedmont Natural Gas Company, Inc., and Docket No. G-5, Sub 632 Re: The Public Service Company of North Carolina, Mr. Hinton considered a CEM as a check on his results, he chose not to do so in this proceeding.
Q. HAVE YOU CONDUCTED A CEM ANALYSIS SIMILAR TO WHAT MR. HINTON HAS CONDUCTED IN PRIOR RATE CASES?
A. Yes, I did. Though I disagree with the application of Mr. Hinton's CEM analysis, I examined six years of Value Line historical earned returns on equity for each company in his proxy group, as Mr. Hinton did in both of the prior mentioned proceedings. Additionally, as previously discussed, the cost of capital and ratemaking are expectational in nature and, as such, need to use projected data, so I have also examined Value Line's projected earned returns for the 2022, 2023, and 2025-2027 periods.
Q. WHAT ARE THE RESULTS OF THAT ANALYSIS?
A. As shown on Schedule DWD-4R, based on historical returns, the average ROE is $10.01 \%$ (median 10.00\%) and based on projected returns the average ROE is $9.81 \%$ (median $10.25 \%$ ). Even if used as a check, Mr. Hinton's CEM analysis would indicate that his DCF result of $9.00 \%$ and his overall ROE recommendation of $9.45 \%$ is woefully inadequate.

Rebuttal Testimony of Dylan W. D'Ascendis

## D. CONCLUSION OF HINTON ADJUSTED RESULTS

Q. What are the results of mr. hinton's roe models after MAKING THE ADJUSTMENTS DESCRIBED TO HIS DCF AND RPM?
A. As shown in Table 3, below, Mr. Hinton's adjusted results are as follows:

Table 3: Mr. Hinton's Adjusted ROE Model Results

| Model | Range | Midpoint |
| :--- | :---: | :---: |
| Discounted Cash Flow | $10.00 \%-10.80 \%$ | $10.40 \%$ |
| Risk Premium Model | $9.88 \%-10.12 \%$ | $10.00 \%$ |

Mr. Hinton's corrected DCF model and RPM results are within the range of $9.88 \%$ and $10.80 \%$. The CEM result between $9.81 \%$ and $10.25 \%$ confirms that range. These indicated ranges of ROE do not reflect the Company's smaller size relative to the proxy group and as such, do not yet reflect the investor-required return for CWSNC.
Q. DOES MR. HINTON MAKE A SPECIFIC ADJUSTMENT TO REFLECT THE SMALLER SIZE OF THE COMPANY RELATIVE TO HIS PROXY

## GROUP?

A. No. As discussed in my Direct Testimony, ${ }^{35}$ relative company size is a significant element of business risk for which investors expect to be compensated through greater returns. Smaller companies are simply less able to cope with significant events which affect sales, revenues and earnings. For example, smaller companies face more exposure to business
${ }^{35}$ D'Ascendis Direct Testimony, at 63-66.
Rebuttal Testimony of Dylan W. D'Ascendis
cycles and economic conditions，both nationally and locally．Additionally， the loss of revenues from a few large customers would have a far greater effect on a small company than on a larger company with a more diverse customer base．Finally，smaller companies are generally less diverse in their operations and have less financial flexibility．Consistent with the financial principle of risk and return in my Direct Testimony，${ }^{36}$ such increased risk due to small size must be reflected in the allowed rate of return on common equity．

Q．IS THERE AN EMPIRICAL STUDY IN ADDITION TO THE EMPIRICAL ANALYSIS YOU PERFORMED IN YOUR DIRECT TESTIMONY WHICH EVALUATES THE EFFECT OF SIZE ON THE COST OF EQUITY？

A．Yes．Kroll＇s Cost of Capital Navigator：U．S．Cost of Capital Module（＂Kroll＂） presents a Size Study based on the relationship of various measures of size and return．Relative to the relationship between average annual return and the various measures of size，Kroll states：

> The＂size＂of a company is one of the most important risk elements to consider when developing cost of equity estimates for use in valuing a business simply because size has been shown to be a predictor of equity returns．

> Traditionally，researchers have used market value of equity（market capitalization，or simply＂market cap＂） as a measure of size in conducting historical rate of return studies．However，as we discuss later in this chapter，market cap is not the only measure of size that
can be used to predict return, nor is it necessarily the best measure of size to use. ${ }^{37}$

The Size Study uses the following eight measures of size, all of which have empirically shown that over the long-term, the smaller the company, the higher the risk:

- Market Value of Common Equity (or total capital if no debt / equity);
- Book Value of Common Equity;
- Net Income (five-year average);
- Market Value of Invested Capital;
- Total Assets (Invested Capital);
- Earnings Before Interest, Taxes, Depreciation \& Amortization ("EBITDA") (five-year average);
- Sales / Operating Revenues; and
- Number of Employees.

I used the Kroll Size Study to determine the approximate magnitude of any necessary risk premium due to the size of the Company relative to Mr. Hinton's proxy group. Schedule DWD-5R shows the relative size of each Company compared with my and Mr. Hinton's combined proxy groups. Indicated size adjustments based on these relative measures range from $1.31 \%$ to $3.42 \%$ for CWSNC. From these results, it is clear that the

[^6]Company is riskier than our combined proxy groups due to its small size, and that my proposed size adjustment of 10 basis points for the Company is conservative.

## Q. PLEASE DISCUSS MR. HINTON'S CONCERNS WITH YOUR APPLICATION OF A SMALL SIZE PREMIUM FOR CWSNC.

A. While Mr. Hinton acknowledges that "[ijt is factually correct that rating agencies and investors add a risk factor for small companies with relatively limited capital resources" ${ }^{38}$ and that "there are published studies that address how the small size of a company relates to higher risks ${ }^{39}$, he contends, however, is that the size premium does not apply to regulated utilities, and he cites an article by Dr. Annie Wong stating that "utility stocks do not exhibit a significant size premium."

## Q. IS THERE A PUBLISHED RESPONSE TO DR. WONG'S ARTICLE?

A. Yes, there is. In response to Professor Wong's article, The Quarterly Review of Economics and Finance published an article in 2003, authored by Thomas M. Zepp, which commented on the Wong article cited by Mr. Hinton. Relative to Dr. Wong's results, Dr. Zepp concluded in the Abstract on page 1 of his article: "Her weak results, however, do not rule out the possibility of a small firm effect for utilities. ${ }^{, 40}$ Dr. Zepp also noted on page 582 that: "Two other studies discussed here support a conclusion that
smaller water utility stocks are more risky than larger ones. To the extent that water utilities are representative of all utilities, there is support for smaller utilities being more risky than larger ones." ${ }^{41}$
Q. HAVE YOU PERFORMED STUDIES SPECIFIC TO UTILITY COMPANIES THAT LINK SIZE AND RISK?
A. Yes, I have performed two studies that link size and risk for utility companies. My first study included the universe of electric, gas, and water companies included in Value Line Standard and Small and Mid-Cap Editions. From each of the utilities' Value Line Ratings \& Reports, I calculated the 10-year annualized volatility of daily prices (a measure of risk) and current market capitalization (a measure of size) for each company. After ranking the companies by size (largest to smallest) and risk (least risky to most risky), I made a scatter plot of the data, as shown on Chart 5, below:

41 Thomas M. Zepp, "Utility Stocks and the Size Effect --- Revisited", The Quarterly Review of Economics and Finance, 43 (2003), at 578-582.

## Chart 5: Relationship Between Size and Risk for the

Value Line Universe of Utility Companies ${ }^{42}$


As shown in Chart 5 above, as company size decreases (increasing size rank), the annualized volatility increases, linking size and risk for utilities, which is significant at $95.0 \%$ confidence level.

The second study used the same universe of companies, but instead of using annualized volatility, I used the Value Line Safety Ranking, which is another measure of total risk. ${ }^{43}$ After ranking the companies by size and Safety Ranking, I made a scatterplot of those data, as shown on Chart 6, below:

42 Source: Value Line
Value Line also ranks stocks for Safety by analyzing the total risk of a stock compared to the approximately 1,700 stocks in the Value Line universe. Each of the stocks tracked in the Value Line Investment Survey is ranked in relationship to each other, from 1 (the highest rank) to 5 (the lowest rank). Safety is a quality rank, not a performance rank, and stocks ranked 1 and 2 are most suitable for conservative investors; those ranked 4 and 5 will be more volatile. Volatility means prices can move dramatically and often unpredictably, either down or up. The major influences on a stock's Safety rank are the company's financial strength, as measured by balance sheet and financial ratios, and the stability of its price over the past five years.

Rebuttal Testimony of Dylan W. D'Ascendis

Chart 6: Relationship Between Size and Safety Ranking for the Value Line Universe of Utility Companies ${ }^{44}$


Similar to the first study, as company size decreases, Safety Ranking degrades, indicating a link between size and risk for utilities. This study is also significant at the $95 \%$ confidence level.
Q. ARE YOU AWARE OF ANOTHER ACADEMIC ARTICLE RELATING TO THE APPLICABILITY OF A SIZE PREMIUM?
A. Yes. An article by Michael A. Paschall, ASA, CFA, and George B. Hawkins ASA, CFA, "Do Smaller Companies Warrant a Higher Discount Rate for Risk?" also supports the applicability of a size premium. As the article makes clear, all else equal, size is a risk factor which must be taken into account when setting the cost of capital or capitalization (discount) rate. Paschall and Hawkins state in their conclusion as follows:

44 Source: Value Line.
Rebuttal Testimony of Dylan W. D'Ascendis

The current challenge to traditional thinking about a small stock premium is a very real and potentially troublesome issue. The challenge comes from bright and articulate people and has already been incorporated into some court cases, providing further ammunition for the IRS. Failing to consider the additional risk associated with most smaller companies, however, is to fail to acknowledge reality. Measured properly, small company stocks have proven to be more risky over a long period of time than have larger company stocks. This makes sense due to the various advantages that larger companies have over smaller companies. Investors looking to purchase a riskier company will require a greater return on investment to compensate for that risk. There are numerous other risks affecting a particular company, yet the use of a size premium is one way to quantify the risk associated with smaller companies. ${ }^{45}$

Hence, Paschall and Hawkins corroborate the need for a small size adjustment, all else equal.
Q. WHAT WOULD MR. HINTON'S CORRECTED RANGE OF ROES BE

## AFTER ADJUSTMENT FOR THE COMPANY'S SMALL RELATIVE

 SIZE?A. Applying a small size premium of $0.10 \%$ to Mr. Hinton's $10.00 \%$ to $10.80 \%$ indicated range of ROEs applicable to his proxy group would result in a Company-specific ROE range between $10.10 \%$ and $10.90 \%$. Mr. Hinton's adjusted range of ROEs includes the Company's requested BY and FY ROEs of $10.45 \%$ and $10.70 \%$, respectively.

45 Michael A. Paschall, ASA, CFA and George B. Hawkins ASA, CFA, Do Smaller Companies Warrant a Higher Discount Rate for Risk?, CCH Business Valuation Alert, Vol. 1, Issue No. 2, December 1999.

Rebuttal Testimony of Dylan W. D'Ascendis
Q. MR. HINTON JUSTIFIES HIS RECOMMENDED ROE OF 9.45\% BY REVIEWING THE INTEREST COVERAGE RATIO AND CONFIRMING THAT HIS ROE WOULD ALLOW THE COMPANY A SINGLE "A" RATING. ${ }^{46}$ DOES ONE MEASURE OF FINANCIAL RISK SUCH AS PRETAX INTEREST COVERAGE INDICATE A SPECIFIC CREDIT RATING?
A. No. While I do not take issue with Mr. Hinton's inputs or calculations in determining CWSNC's pre-tax interest coverage ratio, I note that the ratios of pre-tax coverage needed to qualify for a single " A " rating range from 3.0 to 6.0. As can be seen in Schedule DWD-6R, ROEs ranging from as low as $7.15 \%$ to as high as $17.87 \%$ all allow CWSNC to qualify for a single " A " rating based on its pre-tax coverage ratio. Clearly, a significantly large range of results indicates that simply relying on a single measure, out of a multitude of measures reviewed by the bond/credit ratings agencies, to determine a company's bond rating is without significance.

## E. THE COMPANY'S PROPOSED WATER AND SEWER

 INFRASTRUCTURE PLAN AND ITS EFFECT ON ROEQ. MR. JUNIS, MS. SUN, AND MS. ZHANG SUGGEST THAT BECAUSE THE FY ROE IS GREATER THAN THE BY ROE, THE COMPANY BELIEVES THAT THE "WSIP PRESENTS GREATER RISKS AND THAT

## CUSTOMERS SHOULD COMPENSTATE FOR THAT RISK WITH A HIGHER ROE". ${ }^{47}$ IS THIS A VALID CHARACTERIZATION?

A. No, it is not. As stated in my Direct Testimony, the recommended ROEs for the BY and FY periods are based solely on underlying changes in forecasted interested rates during the FY period relative to the BY period. ${ }^{48}$
Q. MR. HINTON PROPOSES A 20-BASIS-POINT DEDUCTION TO THE COMMISSION-AUTHORIZED ROE IF THE COMMISSION APPROVES THE COMPANY'S REQUESTED WSIP. ${ }^{49}$ WHAT REASONS DOES MR. HINTON GIVE TO JUSTIFY HIS 20-BASIS-POINT ADJUSTMENT?
A. Mr. Hinton's main reason to deduct 20 basis points from the approved ROE in this case is due to the WSIP's effect on regulatory lag, as it allows enhanced cost recovery of eligible capital improvements. ${ }^{50} \mathrm{Mr}$. Hinton also mentions that the reduction in regulatory lag will enhance the Company's ability to match revenues and expenses, which in turn should reduce the non-weather related volatility of earnings. ${ }^{51}$

[^7]Q. DO YOU AGREE WITH MR. HINTON'S PROPOSED 20-BASIS-POINT DEDUCTION?
A. No, I do not. I do not agree with Mr. Hinton's adjustment because he did not prove that the Company's requested WSIP is unique relative to his proxy group.
Q. WHAT IS YOUR POSITION ON REGULATORY MECHANISMS AND THE COST OF COMMON EQUITY?
A. It is important to remember that determining the cost of capital is a comparative exercise, so if similar mechanisms are common throughout the companies on which one bases their analyses, the comparative risk is zero, because any impact of the perceived reduced risk of the mechanism(s) by investors would be reflected in the market data of the proxy group. This is a critical and necessary aspect of assessing whether an annual rate mechanism affects a utility's overall risk. As discussed in my Direct Testimony, the WSIP serves as a multi-year rate plan, generating fully forecasted future test years and associated revenue requirements.
Q. DID MR. HINTON ATTEMPT TO SURVEY HIS PROXY GROUP FOR SIMILAR REGULATORY MECHANISMS?
A. No, he did not.
Q. HAVE YOU IDENTIFIED THE COMPANIES IN YOUR PROXY GROUP WHOSE MARKET DATA WOULD REFLECT FULLY FORECASTED FUTURE TEST YEARS?
A. Yes, I have. In response to discovery from Public Staff, I identified that multi-year rate plans are common in the state of California, which would be reflected in the market data of American States Water Company, American Water Works Co., Inc., (through California American Water), California Water Service, and SJW Corp. Similarly, fully forecasted future test years are common in lowa, Tennessee, Virginia, Pennsylvania, and New York, which would be reflected in the market data of American Water Works, Co., Inc. (through IA American, TN American, VA American, and PA American), and Essential Utilities, Inc (through Aqua PA and VA). ${ }^{52}$ As detailed above, fully forecasted future test years are reflected in the market data of every proxy group company except for Middlesex Water Company. As such, any risk reduction attributable to a multi-year rate plan would be reflected in their market data, and a further reduction to the Company's ROE would constitute as a double count.
Q. MR. HINTON MENTIONS THAT RATINGS AGENCIES VIEW MULTIYEAR RATE PLANS FAVORABLY. ${ }^{53}$ DID HE PROVIDE ANY

[^8]
## EXAMPLES OF A UTILITY＇S CREDIT RATING BEING UPGRADED UPON APPROVAL OF A MULTI－YEAR RATE PLAN？

A．No，he did not．As no utility＇s credit rating been upgraded upon approval of a multi－year rate plan，Mr．Hinton＇s quantification of a 20－basis－point deduction to the Company＇s authorized ROE has no basis．

Q．MR．HINTON CRITIQUES YOUR ROE BAND OF 200 BASIS POINTS ${ }^{54}$ PLEASE RESPOND．

A．In the order adopting Commission Rule R1－17A establishing the WSIP， specifically，Issue 6：Banding of Authorized Rates of Return，the Public Staff proposed the rule that＂Any banding of the water utility＇s authorized return shall not exceed 100 basis points above or below the midpoint．＂My recommended band between $9.70 \%-11.70 \%$ is consistent with Public Staff＇s proposed rule．

Q．MR．HINTON ALSO STATES THAT THE ROE BAND PROVIDES＂NO BENEFITS TO RATEPAYERS＂BECAUSE THE LOWER LIMIT IS 30 BASIS POINTS ABOVE THE COMMISSION－APPROVED ROE IN THE COMPANY＇S LAST RATE CASE．${ }^{55}$ PLEASE RESPOND．

A．The ROE is not constant，as investor expectations are constantly changing to reflect the latest market data and changes in capital markets．As stated in Bluefield，an ROE＂may be reasonable at one time and become too high or too low by changes affecting opportunities for investment，the money

[^9]market and business conditions generally". ${ }^{56} \mathrm{Mr}$. Hinton's own recommended ROE has also increased from the Company's last rate case by 50 basis points, illustrating that capital costs are higher today than they were in 2021. As a result, the fact that capital costs have increased from the Company's last rate case is not sufficient to deem that the ROE band is not beneficial to ratepayers.

## F. RESPONSE TO STAFF WITNESS HINTON'S CRITICISMS OF COMPANY ANALYSES

Q. DOES MR. HINTON HAVE ANY CONCERNS WITH YOUR DIRECT TESTIMONY?
A. Yes. Mr. Hinton has concerns with my use of interest rate forecasts and my adjustment for CWSNC's small size compared to the proxy group. I have already discussed the appropriateness of using projected interest rates and the application of size adjustments for cost of capital purposes and will not discuss them again here.

## IV. CONCLUSION

Q. PLEASE SUMMARIZE YOUR REBUTTAL TESTIMONY.
A. Using market data as of October 14, 2022, I updated my ROE model analyses, which generally increased since the filing of my Direct Testimony and reflects current and expected capital market conditions. Regarding Mr. Hinton's direct analyses, I discuss flaws in his analysis that are not consistent with financial literature, resulting in a corrected range of ROEs between $10.10 \%$ and $10.90 \%$, which overlap my recommended range. I also discuss the Company's requested WSIP and why Mr. Hinton's recommended 20-basis point downward adjustment is unwarranted.

Given all of the above, the Company's requested ROE of $10.45 \%$ in the $B Y$ and $10.70 \%$ in the $F Y$ is reasonable.
Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?
A. Yes, it does.

|  | $\underline{\text { Schedule }}$ |
| :--- | :---: |
| Updated Cost of Capital Analysis | DWD-1R |
| Hinton Corrected Discounted Cash Flow Model | DWD-2R |
| Corrected Regression Analysis with Individual Rate Cases | DWD-3R |
| Hinton CEM Analysis | DWD-4R |
| Kroll Size Study | DWD-5R |
| Pre-Tax Interest Coverage | DWD-6R |

Carolina Water Service Inc. of North Carolina Recommended Capital Structure and Cost Rates

Base Year

|  |  |  |  | Weighted Cost <br> Type Of Capital |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
|  | Ratios (1) |  |  | Rate |  |

Projected Rate Year 1 (2023 Projected Interest Rates)

| Type Of Capital | Ratios (1) | Cost Rate |  | Weighted Cost Rate |
| :---: | :---: | :---: | :---: | :---: |
| Long-Term Debt | 50.00\% | 4.64\% | (1) | 2.32\% |
| Common Equity | 50.00\% | 10.70\%-11.70\% | (2) | 5.35\%-5.85\% |
| Total | 100.00\% |  |  | 7.67\%-8.17\% |

Projected Rate Year 2 (2024 Projected Interest Rates)

|  |  |  |  | Weighted Cost <br> Type Of Capital |  |
| :--- | :---: | :---: | :---: | :---: | :---: |
|  | Ratios (1) |  |  | Rate |  |

Projected Rate Year 3 (2025 Projected Interest Rates)

| Type Of Capital | Ratios (1) | Cost Rate |  | Weighted Cost Rate |
| :---: | :---: | :---: | :---: | :---: |
| Long-Term Debt | 50.00\% | 4.64\% | (1) | 2.32\% |
| Common Equity | 50.00\% | 10.67\%-11.67\% | (2) | 5.34\%-5.84\% |
| Total | 100.00\% |  |  | 7.66\% - 8.16\% |

Notes:
(1) Company-provided.
(2) From page 2 of this Schedule.


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Carolina Water Service Inc. of North Carolina
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## Average Median Average of Mean and Median



1) Indicated dividend at $10 / 14 / 2022$ divided by the average closing price of the last 60 trading days ending 10/14/2022 for each company.
(2) From pages 4 through 9 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 American States Water Company, $1.87 \% \times(1+(1 / 2 \times 4.95 \%)$ ) (5) Column $5+$ column 6 .
(6) Excluding the indicated DCF cost rate of Middlesex Water Company, as its result is less than the
yield on A-rated utility bonds.
Value Line Investment Survey
www.zacks.com Downloaded on 10/14/2022
www.yahoo.com Downloaded on 10/14/2022
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| Proxy Group of Six Water Companies |
| :--- |
| American States Water Company |
| American Water Works Company, Inc. |
| California Water Service Group |
| Essential Utilities Inc. |
| Middlesex Water Company |
| SJW Group |





| ESSENTIAL UT\|L, NYSE-wTRG |  |  |  |  |  |  |  | $\begin{aligned} & \text { RECENT } \\ & \text { PRICE } \end{aligned}$ | $43.46$ | $\begin{array}{\|l\|} \hline \text { P/E } \\ \text { RATIO } 23.9\binom{\text { Trailing: } 25.6}{\text { Median: } 25.0} \end{array}$ |  |  |  | $\text { RELATIVE } 1.66$ |  | $\begin{aligned} & \mathrm{DVYJD} \\ & \text { YLD } \end{aligned}$ | $2.7 \%$ |  | VALUE LINE |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | High: | 19.0 15.4 | $\begin{aligned} & 21.5 \\ & 16.8 \\ & \hline \end{aligned}$ | 28.1 20.6 | 28.2 22.4 | 31.1 24.4 | 35.8 28.0 | 39.6 <br> 29.4 | $\begin{aligned} & 39.4 \\ & 32.1 \end{aligned}$ | 47.3 32.7 | 54.5 <br> 30.4 | 53.9 41.1 | 53.7 41.0 |  |  | Target Pr 2025 20 | Range \|2027 |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | - 96 |
| 18-Month Target Price Range Low-High Midpoint (\% to Mid) $\$ 38-\$ 72 \quad \$ 55(25 \%)$ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | 32 |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | 24 |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  | 吅吅! |  |  |  |  |  |  |  |  |  |  |  |  |  | R RETURN $8 / 22$ |  |  |
| tional Decision |  |  |  |  |  |  |  | + |  |  |  |  |  |  |  |  |  |  | RETURN 8/22 |  |
|  | 4022 | 10222 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Hlds ${ }^{\text {coo }}$ | 560 | 504 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | 64.154 .9 |  |
| 2006 | 2007 | 2008 | 2009 | 2010 | 11 |  |  | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |  | E LINE PUB. LLC | 25-27 |
| 3.23 | 3.61 | 3.71 | 3.93 | 4.21 | 4.10 | 4.32 | 4.32 | 4.37 | 4.61 | 4.62 | 4.56 | 4.71 | 4.03 | 5.96 | 7.43 | 8.25 | 8.25 | Reven | s per sh | 8.95 |
| 1.01 | 1.10 | 1.14 | 1.29 | 42 | 1.45 | . 51 | 1.82 | 89 | 1.87 | 2.07 | 2.12 | . 90 | . 73 | 2.21 | 2.89 | 3.00 | 3.20 |  | ow" per | 4.00 |
| 56 | . 57 | . 58 | 62 | . 72 | . 83 | . 87 | . 16 | . 20 | . 14 | 1.32 | 1.35 | 1.08 | 1.04 | 1.12 | 1.67 | 1.80 | 1.95 | Earni | per sh | 2.25 |
| 35 | 38 | .41 | . 44 | 47 | 50 | . 54 | . 58 | . 63 | 69 | 74 | 79 | . 85 | . 91 | 97 | 1.04 | 1.11 | 1.20 | Div'd | cl'd per sh | 1.55 |
| 1.64 | 43 | 1.58 | 1.66 | 1.89 | 1.90 | 1.98 | 1.73 | 1.84 | 2.07 | 2.16 | 2.69 | 2.78 | 2.49 | 3.41 | 4.04 | 3.95 | 3.85 | Cap' | ending per | 3.80 |
| 5.57 | 5.85 | 6.26 | 6.50 | 6.81 | 7.21 | 7.90 | 8.63 | 9.27 | 9.78 | 0.43 | 11.02 | 11.28 | 17.58 | 19.09 | 20.50 | 21.4 | 22.3 | Book | ue per sh | 26.90 |
| 65.41 | 166.75 | 69.21 | 70.61 | 72.46 | 73.60 | 75.43 | 77.93 | 78.59 | 76.54 | 77.39 | 177.71 | 178.09 | 220.76 | 245.39 | 252.87 | 255.00 | 260.0 | Com | Shs Outst'g | 80.0 |
| 34.7 | 32.0 | 24.9 | 23.1 | 21.1 | 21.3 | 21.9 | 21.2 | 20.8 | 23.5 | 23.9 | 24.7 | 32.6 | 39.1 | 39.6 | 28.3 | Bold fil |  | Avg | IPIE Ratio | 26.0 |
| 1.87 | 70 | 1.50 | 1.54 | 1.34 | 34 | 1.39 | 1.19 | 1.09 | 1.18 | . 25 | . 24 | 1.76 | 2.08 | 2.03 | . 55 |  |  | Rel | Ratio | , 4 |
| 1.8\% | 2.1\% | 2.8\% | 3.1\% | 1\% | 2.8\% | 2.8\% | 2.4\% | 2.5\% | 2.6\% | 2.3\% | 2.4\% | 2.4\% | 2.2\% | 2.28 | $2.2 \%$ |  |  | Avg Ar | I Div'd Yield | 2.7\% |
| CAPITAL STRUCTURE as of $6 / 30 / 22$ Total Debt $\$ 6213.3$ mill. Due in 5 Yrs $\$ 882.1$ mill. LT Debt $\$ 6087.7$ mill. LT Interest $\$ 216.0$ mill.$\text { ( } 53 \% \text { of Cap') }$ |  |  |  |  |  | 757.8 | 768.6 | 779.9 | 814.2 | 819.9 | 809.5 | 838.1 | 889.7 | 1462.7 | 1878.1 | 2110 | 2150 | Reve | (Smill) | 5500 |
|  |  |  |  |  |  | 153.1 | 205.0 | 213.9 | 201.8 | 234.2 | 239.7 | 192.0 | 224.5 | 88 | 431. | 460 | 505 | Net Pro | (\$mill) | 630 |
|  |  |  |  |  |  | 9.0\% | 0.0\% | 0.5\% | 6.9\% | 8.28 | 6.6\% |  |  |  |  | 4.0 | 10.0\% | Income | ax Rate | 5.0\% |
|  |  |  |  |  |  |  | 1.1\% | 2.4\% | 3.1\% | 3.8\% | 6.3\% | 6.8\% | 7.2\% | 4.5\% | 4.8\% | 5.0\% | 5.0\% | AFUDC | \% to Net Profit | 6.0\% |
| Pension Assets-12/21 \$433.1 mil |  |  |  |  |  | 52.7\% | 48.9\% | 48.5\% | 50.3\% | 48.4 | 50.6\% | $54.4{ }^{\circ}$ | 43.1 | 54.0\% | 52.7 | 54.0 | 54.5 | Long-Te | $m$ Debt Ratio | 53.0\% |
| Pfd Stock None Obilig. \$452.9 |  |  |  |  |  | 47.3\% | 51.1\% | 51.5\% | 49.7\% | 51.6\% | $49.4{ }^{\circ}$ | 45.6\% | 56.9 | 46.0 | 47.3 | 46.0 | 45.5 | Commo | Equity Ratio | \% |
|  |  |  |  |  |  | 2929.7 | 3003.6 | 3216.0 | 3469.5 | 3587. | 3965.4 | 4407.8 | 6824. | 10192 | 109 | 11975 | 128 | Total | ital (Smill) | 2000 |
| Common Stock 262,170,763 shares as of $7 / 22 / 22$ |  |  |  |  |  | 3936.2 | 4167.3 | 4402.0 | 4688.9 | 5001.6 | 5399.9 | 5930.3 | 6345.8 | 9512.9 | 1025 | 109 | 1160 | Net Plan | (Smill) | 13500 |
|  |  |  |  |  |  | 6.6\% | 8.0\% | 7.8\% | 6.9\% | 7.6\% | 7.1\% | 5.5\% | 4.2\% | 3.78 | 4.8\% | 5.5\% | 5.5\% | Return | Total Cap' | 5.5\% |
| MARKET CAP: $\$ 11.4$ billion (Large Cap) |  |  |  |  |  | 1.0\% | 13.4\% | 12.9\% | 11.7\% | 12.79 | 12.2 | 9.6\% | 5.8\% | 6.19 | 8.36 | 8.5\% | 8.5 | Return | Shr. Equity | 8.5\% |
|  |  |  |  |  |  | 11.0\% | 13.4\% | 12.9\% | 11.7\% | 12.7\% | 12.2\% | $9.6 \%$ | 5.8\% | 6.1\% | 8.3\% | 8.5\% | 8.5 | Return | Com Equity | 8.5\% |
| $\begin{array}{lrrr}\text { CURREN P P PSITION } & 2020 & 2021 & \mathbf{6} \\ \text { (SWMLL.) }\end{array}$ |  |  |  |  |  |  |  | 6.1\% | 4.7\% | 5.6\% | 5.1\% | 2.1 |  |  |  | 3.0 | 3.0\% | Retair | to Com Eq | 2.5\% |
|  |  |  |  |  |  | 61\% | 50\% | 52\% | 60\% | 56\% | 59\% | 79\% | $84 \%$ | 82\% |  | 62\% | 62\% | All D | Net Pro | 69\% |
| Receivables Inventory (Avg Other <br> Current Assets Accts Payable Debt Due Other Current Liab. |  |  |  | 10.6 13.0 <br> 141.0 143.4 <br> 109.6 128.6 <br> 176.6 128.6 <br> 437.8 413.3 <br> 192.9 14.1 <br> 197.1 115.6 <br> 285.1 224.4 <br> 675.1 544.1 |  | BUSINESS: Essential Utilities, Inc. became the new name for Aqua America on Feb. 3, 2020, to reflect the acquisition of Peoples, a natural gas utility, which occurred in $3 / 20$. In 2021, Aqua Amer. provided water and wastewater services to about 5 million people in PA, OH, TX, IL, NC, NJ, IN, VA NS WS. Employs 3,211. Acquired AquaSource, 7/13; N. Maine Util., 7/15; and others. Water respn. |  |  |  |  |  |  |  | for $52 \%$ of revenues in 2021; residential, 30\%; commercial, $8.0 \%$; industrial, wastewater \& other, $14 \%$. Gas $46 \%$; other, $2.0 \%$. Off. \& dir. own less than $1 \%$ of the common stock; BlackRock, $10.6 \%$; Vanguard, 9.7\%; Can. Pen. Plan 8.6\% (3/22 proxy). Pres. \& CEO: Christopher Franklin. Inc.: PA Addr.: 762 W Lancaster Ave., Bryn Mawr, PA 19010. Tel.: 610-525-1400. Int.: www.essential.co. |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  | 80.2 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | $\begin{array}{lll}603.9 & 675.1 & 544.1\end{array}$ |  |  |  |  |  |  |  |  |  |  |  | long-term growth. America's water industry is incredibly fragmented with most |  |  |  |  |  |  |
| ANNUAL RATES of change (per sh) Revenues "Cash Flow" Earnings DividendsBook Value ook Value |  |  |  | Past5 Yrs.Estd ' 10 ' $25 \cdot-27$ |  | Essential Utilities, second-quarterearnings were in line with our ex- |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | $\begin{aligned} & \begin{array}{l} \text { Yrs. } \\ 3.50 \end{array} \end{aligned}$ |  |  |  | pectations. The water and gas utilityposted share net of $\$ 0.31$, versus our $\$ 0.32$ |  |  |  |  |  |  |  | water districts being run by small, undercapitalized municipal entities. Not only |  |  |  |  |  |  |
|  |  |  |  | $\begin{array}{ll}5.0 \% & \text { 10.5\% }\end{array}$ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  | estimate. Management reaffirmed the |  |  |  |  |  |  |  | dercapitalized municipal entities. Not only do they not have the funds required to re- |  |  |  |  |  |  |
|  |  |  |  | $\begin{array}{rr} 1.0 \% \% & 8.0 \% \\ 140 \% & 60 \% \end{array}$ |  |  |  |  |  |  |  |  |  | do they not have the funds required to replace old pipelines and treatment centers, |  |  |  |  |  |  |
| Calendar |  |  |  |  | $\begin{aligned} & \hline \text { Full } \\ & \text { Year } \\ & \hline \end{aligned}$ |  |  |  |  |  |  |  |  | but they are inefficient. When a bigger company, such as Aqua, takes over a |  |  |  |  |  |  |
|  |  |  |  |  | timates of $\$ 1.80$ and 1.95 for 2022 and 2023, respectively. These figures represent |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2019 | $\begin{array}{lllll}\text { Mar.31 } & \text { Jun. } 30 & \text { Sep. } 30 & \text { Dec. } 31 \\ 201.1 & 218.9 & 243.6 & 226.1\end{array}$ |  |  |  |  |  |  |  |  |  |  |  | 89.7 | nificant efficiencies by eliminating many |  |  |  |  |  |  |
| 2020 | 255.6583.5 | 384.5 | 348.6 | 474.0 |  |  |  |  |  |  |  |  |  | redundancies. |  |  |  |  |  |  |
| 2021 |  | $\begin{aligned} & 397.0 \\ & 448.8 \end{aligned}$ | 361.9 | 535.7 | 1462.7 1878.1 2110 | A potential acquisition of a larg |  |  |  |  |  |  |  | The dividend was hiked by a healthy |  |  |  |  |  |  |
| 202 | 699.3 |  | ${ }_{420}^{391.9}$ | 570 | $\begin{aligned} & 2110 \\ & 2150 \end{aligned}$ | wastewater project has been shelved, for now. Last summer, Essential's Aqua America water subsidiary signed an exclu-sivity agreement with the Bucks County |  |  |  |  |  |  |  | percentage. The board increased the quarterly payout by $7 \%$, to $\$ 0.287$ a share |  |  |  |  |  |  |
| 2023 |  | 475 | 420 | 595 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\begin{gathered} \text { Cal- } \\ \text { endar } \\ \hline \end{gathered}$ | EARNINGS PER SHARE A |  |  |  | $\begin{aligned} & \text { Full } \\ & \text { Year } \\ & \hline \end{aligned}$ |  |  |  |  |  |  |  |  | in the | lates | t qua | ter. |  |  |  |
| 2019 | Mar. 31 Jun. 30 Sep. 30 Dec. 31 |  |  |  | $\begin{aligned} & \hline 1.04 \\ & 1.12 \\ & 1.67 \\ & 1.80 \\ & 1.95 \end{aligned}$ |  |  |  |  |  |  |  |  | Shares of Essential do not look partic- |  |  |  |  |  |  |
| 2020 | 21 | . 29 | . 22 | . 40 |  | chasing the asset for about $\$ 1.1$ billion. In early September, the negotiations were |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2021 | . 72 | . 32 | . 19 | . 44 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2022 | . 76 | . 31 | . 22 | . 51 |  | suddenly halted. Aqua continues to ex- averages. Also, the stock's total return |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2023 | . 78 | 37 | . 33 | 47 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| $\begin{array}{\|c\|} \hline \begin{array}{c} \text { Cal- } \\ \text { endar } \end{array} \\ \hline \end{array}$ | QUARTERLY DIVIDENDS PAID ${ }^{\text {B }}$ |  |  |  | Full | tion, however. In any case, it has already closed two acquisitions this year and |  |  |  |  |  |  |  | equity undeothers in |  | - | e | e re | ew. Simi |  |
|  | Mar. 31 | Jun. 30 | Sep. 30 | Dec. 31 |  |  |  |  |  |  |  |  |  | thi | ind | stry, | Essential |  |
| 20 | 20172047 |  |  | . 21 | $\begin{array}{r} .85 \\ .91 \\ .97 \\ 1.04 \end{array}$ | agreed to buy parts, or all of the assets of seven different water systems. The price tag will total approximately $\$ 365$ million. The policy of aggressively buying other water entities ought to help fuel |  |  |  |  |  |  |  |  |  | many appealing features, including welldefined earnings and dividend growth, but they all appear to be more than reflected in the recent quotation. <br> James A. Flood <br> October 7, 2022 |  |  |  |  |  |  |
| 2019 | . 219 | . 219 | . 2343 | . 2343 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2020 | . 2343 | . 2343 | . 2507 | . 2507 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2021 | . 2507 | . 2507 | . 2682 | . 2682 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 2022 | 26 | . 2682 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| (A) Diluted egs. Excl. nonrec. gains: '12, 18 c . Excl. gain from disc. operations: '12, 7c; '13, $9 \mathrm{C} ;$ ' 14,11 . 1 . Quarterly EPS do not add in ' 19due to a large change in the number of shares |  |  |  |  | outstanding in the Dec. period. Next earnings report early November. <br> (B) Dividends historically paid in early March, <br> June, Sept., \& Dec. - Div'd. reinvestment plan |  |  |  |  |  | vailable ( $5 \%$ discount). <br> C) In millions, adjusted for stock split. <br> (D) Includes intangibles: 12/31/21, \$1.231 iil./\$4.87 a share. |  |  |  |  | Company's Financial Strength $\mathrm{B}++$ <br> Stock's Price Stability  <br> Price Growth Persistence 90 <br> Earnings Predictability 60 |  |  |  |  |
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Carolina Water Service Inc. of North Carolina
Summary of Risk Premium Models for the
Proxy Group of Six Water Companies

Base Year (Current Interest Rates)

Projected Rate Year 1 (2023 Proj Interest Rates)

Projected Rate Year 2 (2024 Proj Interest Rates)

Projected Rate Year 3 (2025 Proj Interest Rates)

Predictive Risk Premium Model (PRPM) (1)

Risk Premium Using an Adjusted Total Market Approach (2)


Notes:
(1) From pages 11 through 14 of this Schedule.
(2) From page 15 of this Schedule.

| Proxy Group of Six Water Companies |
| :--- |
| American States Water Company |
| American Water Works Company, Inc. |
| California Water Service Group |
| Essential Utilities Inc. |
| Middlesex Water Company |
| SJW Group |


| Proxy Group of Six Water Companies | [1] | [2] | [3] | [4] | [5] | [6] | [7] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | LT Average Predicted Variance | Spot Predicted Variance | Recommended <br> Variance (2) | GARCH <br> Coefficient | $\begin{gathered} \text { Predicted } \\ \text { Risk } \\ \text { Premium (3) } \\ \hline \end{gathered}$ | Risk-Free <br> Rate (4) | Indicated ROE (5) |
| American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities Inc. Middlesex Water Company SJW Group | 0.38\% | 0.40\% | 0.38\% | 1.8175 | 8.62\% | 3.26\% | 11.88\% |
|  | 0.28\% | 0.33\% | 0.28\% | 4.1911 | 15.02\% | 3.26\% | NMF |
|  | 0.33\% | 0.42\% | 0.33\% | 1.8595 | 7.53\% | 3.26\% | 10.79\% |
|  | 0.45\% | 0.54\% | 0.45\% | 2.1551 | 12.22\% | 3.26\% | 15.48\% |
|  | 0.33\% | 0.68\% | 0.33\% | 1.9058 | 7.86\% | 3.26\% | 11.12\% |
|  | 0.41\% | 0.40\% | 0.41\% | 1.4632 | 7.50\% | 3.26\% | 10.76\% |
| Average $\quad 12.01 \%$ |  |  |  |  |  |  |  |
|  |  |  |  |  |  | Median | 11.12\% |
|  |  |  |  |  | Average of | and Median | 11.57\% |
|  | NMF $=$ Not Me | ful Figure |  |  |  |  |  |
| Notes: <br> (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 Services. |  |  |  |  |  |  |
| (2) | Based on the long-term average predicted variance. |  |  |  |  |  |  |
| (3) | $\left(1+\left(\right.\right.$ Column [3] $*$ Column [4]) ${ }^{\wedge 12}$ ) - 1 . |  |  |  |  |  |  |
| (4) | From note 2 on page 30 of this Schedule. |  |  |  |  |  |  |
|  | Column [5] + Column [6]. |  |  |  |  |  |  |





| Results using <br> Current Interest <br> Rates | Results using <br> Projected 2023 <br> Interest Rates | Results using <br> Projected 2024 <br> Interest Rates | Results using <br> Projected 2025 <br> Interest Rates |
| :---: | :---: | :---: | :---: | :---: |

Notes: (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 22 and 23 of this Schedule).
(2) The average yield spread of A2 rated public utility bonds over Aaa rated corporate bonds of $0.70 \%$ from page 16 of this Schedule.
(3) Three-month average A2-rated utility bond yield ending September 2022 as shown on page 16 of this Schedule.
(4) Adjustment to reflect the A3 Moody's long-term rating of the Utility Proxy Group as shown on page 17 of this Schedule. The $0.12 \%$ upward adjustment is derived by taking $1 / 3$ of the spread between A2 and Baa2 Public Utility Bonds $(1 / 3 * 0.35 \%=0.12 \%)$ as derived from page 16 of this Schedule.
(5) From page 19 of this Schedule.

Carolina Water Service Inc. of North Carolina<br>Interest Rates and Bond Spreads for<br>Moody's Corporate and Public Utility Bonds

Selected Bond Yields
[1]
[2]
[3]

|  | Aaa Rated <br> Corporate Bond | A2 Rated <br> Public Utility <br> Bond |  | Baa2 Rated Public <br> Utility Bond |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | $5.26 \%$ |

Selected Bond Spreads

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:

$$
0.70 \%(1)
$$

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

$$
0.35 \%(2)
$$

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

Source of Information:
Bloomberg Professional Services

Carolina Water Service Inc. of North Carolina
Comparison of Long-Term Issuer Ratings for the
Proxy Group of Six Water Companies

| Moody's |
| :---: |
| Long-Term Issuer Rating |
| October 2022 |


| Standard \& Poor's |
| :---: |
| Long-Term Issuer Rating |
| October 2022 |


| Proxy Group of Six Water Companies | Long- <br> Term <br> Issuer <br> Rating | Numerical <br> Weighting (1) | Long- <br> Term <br> Issuer <br> Rating | Numerical <br> Weighting (1) |
| :---: | :---: | :---: | :---: | :---: |
| American States Water Company (2) | A2 | 6.0 | A+ | 5.0 |
| American Water Works Company, Inc. (3) | A3 | 7.0 | A | 6.0 |
| California Water Service Group | NR | -- | A+ | 5.0 |
| Essential Utilities Inc. (4) | Baa1 | 8.0 | A | 6.0 |
| Middlesex Water Company | NR | -- | A | 6.0 |
| SJW Group (5) | NR | -- | A- | 6.5 |
| Average | A3 | 7.0 | A | 5.8 |

Notes:
(1) From page 18 of this Schedule.
(2) Ratings are that of Golden State Water Company.
(3) Ratings are that of New Jersey American Water Co., and Pennsylvania American Water Co.
(4) Ratings are that of PNG Companies and Aqua Pennsylvania, Inc. (S\&P).
(5) Ratings are that of San Jose Water Company, Connecticut Water Inc. and Connecticut Water Service Inc.

Source Information: Moody's Investors Service

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

| Moody's Bond <br> Rating | Numerical Bond <br> Weighting |  <br> Poor's Bond <br> Rating |
| :---: | :---: | :---: |
| Aaa | 1 | AAA |
| Aa1 | 2 |  |
| Aa2 | 3 | $\mathrm{AA}+$ |
| Aa3 | 4 | AA |
| A1 | 5 | $\mathrm{AA}-$ |
| A2 | 6 | $\mathrm{~A}+$ |
| A3 | 7 | $\mathrm{~A}-$ |
| Baa1 | 8 | $\mathrm{BBB}+$ |
| Baa2 | 9 | BBB |
| Baa3 | 10 | $\mathrm{BBB}-$ |
| Ba1 |  | $\mathrm{BB}+$ |
| Ba2 | 11 | BB |
| Ba3 | 12 | $\mathrm{BB}-$ |
| B1 | 13 | $\mathrm{~B}+$ |
| B2 |  | B |
| B3 | 14 | $\mathrm{~B}-$ |
|  | 15 |  |

Notes: (1) From page 20 of this Schedule. (2) From page 24 of this Schedule.


# Carolina Water Service Inc. of North Carolina <br> Derivation of Equity Risk Premium Based on the Total Market Approach <br> Using the Beta for the <br> Proxy Group of Six Water Companies 

Notes:
(1) Based on the arithmetic mean historical monthly returns on large company common stocks from Kroll 2022 SBBI® 2022 Yearbook minus the arithmetic mean monthly yield of Moody's average Aaa and Aa2 corporate bonds from 1928-2021.
(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 1928-2021 referenced in Note 1 above. The equity risk premium is calculated using current and projected interest rates as indicated. The projected Aaa corporate bond yields for 2023 through 2025 are shown on line 1 of page 15 of this Schedule. The current interest rate is the three-month average Aaa and Aa2 corporate bond yields ending September 2022.
(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 September 2022.
(4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the relevant bond yield from the projected 3-5 year total annual market return of $16.03 \%$ (described fully in note 1 on page 30 of this Schedule).
(5) The equity risk premium based on Value Line data for the S\&P 500 companies subtracts the relevant bond yield from the expected market return of $16.66 \%$ which was derived using expected dividend yields to represent the income return and expected earnings growth to represent the capital appreciation return.
(6) The equity risk premium based on Bloomberg data for the S\&P 500 companies subtracts the relevant bond yield from the expected market return of $12.54 \%$, which was derived using expected dividend yields to represent the income return and expected earnings growth to represent the capital appreciation return.
(7) Average of mean and median beta from pages 26-29 of this Schedule.

## Sources of Information:

Kroll 2022 SBBI® Yearbook
Industrial Manual and Mergent Bond Record
Value Line Summary and Index
Blue Chip Financial Forecasts, June 1, 2022 and September 30, 2022
Bloomberg Professional Services

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

| Interest Rates | History- |  |  |  |  |  |  |  | Consensus Forecasts-Quarterly Avg. |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  |  |  |  | 4Q | 1Q | 2 Q | 3Q | 4Q | 1Q |
|  | Sep 23 | Sep 16 | Sep 9 | $\underline{\text { Sep } 2}$ | Aug | Jul | Jun | 3Q 2022* | $\underline{2022}$ | $\underline{2023}$ | $\underline{2023}$ | 2023 | $\underline{2023}$ | $\underline{2024}$ |
| Federal Funds Rate | 2.33 | 2.33 | 2.33 | 2.33 | 2.33 | 1.68 | 1.21 | 2.12 | 3.8 | 4.3 | 4.4 | 4.3 | 4.2 | 3.9 |
| Prime Rate | 5.50 | 5.50 | 5.50 | 5.50 | 5.50 | 4.85 | 4.38 | 5.29 | 6.9 | 7.4 | 7.5 | 7.4 | 7.3 | 6.9 |
| SOFR | 2.55 | 2.28 | 2.28 | 2.29 | 2.28 | 1.60 | 1.11 | 2.09 | 3.6 | 4.2 | 4.3 | 4.3 | 4.1 | 3.7 |
| Commercial Paper, 1-mo. | 3.04 | 2.64 | 2.54 | 2.39 | 2.33 | 1.90 | 1.35 | 2.26 | 3.8 | 4.4 | 4.5 | 4.4 | 4.3 | 3.9 |
| Treasury bill, 3-mo. | 3.31 | 3.22 | 3.06 | 2.96 | 2.72 | 2.30 | 1.54 | 2.71 | 3.8 | 4.3 | 4.3 | 4.2 | 4.0 | 3.7 |
| Treasury bill, 6-mo. | 3.86 | 3.72 | 3.45 | 3.32 | 3.15 | 2.87 | 2.17 | 3.20 | 4.1 | 4.5 | 4.5 | 4.3 | 4.1 | 3.8 |
| Treasury bill, 1 yr . | 4.08 | 3.91 | 3.62 | 3.48 | 3.28 | 3.02 | 2.65 | 3.35 | 4.3 | 4.5 | 4.5 | 4.3 | 4.1 | 3.8 |
| Treasury note, 2 yr . | 4.05 | 3.77 | 3.50 | 3.45 | 3.25 | 3.04 | 3.00 | 3.33 | 4.1 | 4.3 | 4.2 | 4.0 | 3.8 | 3.6 |
| Treasury note, 5 yr . | 3.81 | 3.59 | 3.41 | 3.31 | 3.03 | 2.96 | 3.19 | 3.17 | 3.9 | 4.1 | 4.0 | 3.8 | 3.7 | 3.6 |
| Treasury note, 10 yr . | 3.59 | 3.42 | 3.31 | 3.17 | 2.90 | 2.90 | 3.14 | 3.05 | 3.7 | 3.9 | 3.8 | 3.7 | 3.6 | 3.6 |
| Treasury note, 30 yr . | 3.57 | 3.50 | 3.46 | 3.29 | 3.13 | 3.10 | 3.25 | 3.23 | 3.8 | 3.9 | 4.0 | 3.9 | 3.8 | 3.8 |
| Corporate Aaa bond | 4.86 | 4.77 | 4.73 | 4.57 | 4.35 | 4.39 | 4.52 | 4.49 | 5.0 | 5.4 | 5.4 | 5.4 | 5.2 | 5.1 |
| Corporate Baa bond | 5.64 | 5.53 | 5.48 | 5.33 | 5.08 | 5.15 | 5.22 | 5.24 | 6.0 | 6.4 | 6.5 | 6.4 | 6.3 | 6.1 |
| State \& Local bonds | 4.35 | 4.21 | 4.16 | 4.08 | 3.84 | 3.82 | 3.94 | 3.95 | 4.4 | 4.6 | 4.7 | 4.6 | 4.5 | 4.4 |
| Home mortgage rate | 6.29 | 6.02 | 5.89 | 5.66 | 5.22 | 5.41 | 5.52 | 5.53 | 6.3 | 6.4 | 6.3 | 6.2 | 6.1 | 5.9 |
|  |  |  |  | -Histo |  |  |  |  |  | nsensu | Fore | casts-Q | Quarter |  |
|  | 4Q | 1Q | 2Q | 3Q | 4Q | 1Q | 2Q | 3Q | 4Q | 1Q | 2Q | 3Q | 4Q | 1Q |
| Key Assumptions | $\underline{2020}$ | 2021 | 2021 | 2021 | $\underline{2021}$ | $\underline{2022}$ | $\underline{2022}$ | 2022** | $\underline{2022}$ | 2023 | $\underline{2023}$ | $\underline{2023}$ | 2023 | $\underline{2024}$ |
| Fed's AFE \$ Index | 105.1 | 103.4 | 102.9 | 105.0 | 107.0 | 108.4 | 113.7 | 118.5 | 121.4 | 121.5 | 120.4 | 118.8 | 117.6 | 117.0 |
| Real GDP | 3.9 | 6.3 | 7.0 | 2.7 | 7.0 | -1.6 | -0.6 | 1.4 | 0.7 | 0.1 | 0.1 | 0.9 | 1.3 | 1.6 |
| GDP Price Index | 2.5 | 5.2 | 6.3 | 6.2 | 6.8 | 8.3 | 9.0 | 4.9 | 4.3 | 3.5 | 3.0 | 2.8 | 2.7 | 2.5 |
| Consumer Price Index | 2.2 | 4.1 | 8.2 | 6.7 | 7.9 | 9.2 | 10.5 | 5.3 | 3.9 | 3.4 | 3.0 | 2.6 | 2.5 | 2.4 |
| PCE Price Index | 1.6 | 4.5 | 6.4 | 5.6 | 6.2 | 7.5 | 7.3 | 4.5 | 3.7 | 3.2 | 2.7 | 2.5 | 2.4 | 2.3 |

Forecasts for interest rates and the Federal Reserve's Advanced Foreign Economies Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index, CPI and PCE 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; SOFR from the New York Fed. *Interest rate data for 3Q 2022 based on historical data through the week ended Sep 23. **Data for 3Q 2022 for the Fed's AFE \$ Index based on data through the week ended September 23. Figures 3Q 2022 based on historical data through the week ended Sep 23. **Data for 3Q 2022 for the Fed's AFE $\$$ Index based on data through the week ended
for 3Q 2022 Real GDP, GDP Chained Price Index, Consumer Price Index, and PCE Price Index are consensus forecasts from the September 2022 survey.


## Long-Range Survey:

The table below contains the results of our twice-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are consensus estimates for the years 2023 through 2028 and averages for the five-year periods 2024-2028 and 2029-2033. Apply these projections cautiously. Few if any economic, demographic and political forces can be evaluated accurately over such long time spans.

|  |  |  |  |  |  |  |  | Five-Year Averages |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2024-2028 | 2029-2033 |
| 1. Federal Funds Rate | CONSENSUS | 3.0 | 2.7 | 2.5 | 2.5 | 2.5 | 2.5 | 2.6 | 2.5 |
|  | Top 10 Average | 3.5 | 3.3 | 3.0 | 2.8 | 2.8 | 2.8 | 3.0 | 2.8 |
|  | Bottom 10 Average | 2.6 | 2.1 | 2.0 | 2.2 | 2.2 | 2.2 | 2.2 | 2.1 |
| 2. Prime Rate | CONSENSUS | 6.1 | 5.9 | 5.7 | 5.6 | 5.6 | 5.6 | 5.7 | 5.6 |
|  | Top 10 Average | 6.6 | 6.4 | 6.1 | 6.0 | 6.0 | 6.0 | 6.1 | 5.9 |
|  | Bottom 10 Average | 5.6 | 5.3 | 5.2 | 5.3 | 5.3 | 5.3 | 5.3 | 5.2 |
| 3. SOFR | CONSENSUS | 3.0 | 2.8 | 2.5 | 2.5 | 2.5 | 2.5 | 2.6 | 2.5 |
|  | Top 10 Average | 3.4 | 3.3 | 3.0 | 2.9 | 2.8 | 2.8 | 3.0 | 2.8 |
|  | Bottom 10 Average | 2.7 | 2.2 | 2.0 | 2.2 | 2.2 | 2.2 | 2.2 | 2.1 |
| 4. Commercial Paper, 1-Mo | CONSENSUS | 3.2 | 2.9 | 2.6 | 2.6 | 2.6 | 2.6 | 2.7 | 2.6 |
|  | Top 10 Average | 3.5 | 3.4 | 3.1 | 2.9 | 2.9 | 2.9 | 3.0 | 2.9 |
|  | Bottom 10 Average | 2.8 | 2.5 | 2.3 | 2.4 | 2.4 | 2.3 | 2.3 | 2.3 |
| 5. Treasury Bill Yield, 3-Mo | CONSENSUS | 3.0 | 2.8 | 2.6 | 2.6 | 2.6 | 2.5 | 2.6 | 2.5 |
|  | Top 10 Average | 3.6 | 3.4 | 3.1 | 3.1 | 3.0 | 2.9 | 3.1 | 2.9 |
|  | Bottom 10 Average | 2.5 | 2.2 | 2.0 | 2.1 | 2.2 | 2.2 | 2.1 | 2.2 |
| 6. Treasury Bill Yield, 6-Mo | CONSENSUS | 3.2 | 2.9 | 2.7 | 2.7 | 2.7 | 2.6 | 2.7 | 2.6 |
|  | Top 10 Average | 3.8 | 3.6 | 3.2 | 3.2 | 3.1 | 3.0 | 3.2 | 3.0 |
|  | Bottom 10 Average | 2.6 | 2.2 | 2.1 | 2.2 | 2.3 | 2.3 | 2.2 | 2.3 |
| 7. Treasury Bill Yield, 1-Yr | CONSENSUS | 3.2 | 3.0 | 2.9 | 2.9 | 2.8 | 2.8 | 2.9 | 2.8 |
|  | Top 10 Average | 3.9 | 3.8 | 3.5 | 3.4 | 3.3 | 3.2 | 3.4 | 3.2 |
|  | Bottom 10 Average | 2.6 | 2.4 | 2.2 | 2.4 | 2.4 | 2.4 | 2.3 | 2.4 |
| 8. Treasury Note Yield, 2-Yr | CONSENSUS | 3.4 | 3.2 | 3.1 | 3.1 | 3.0 | 3.0 | 3.1 | 3.0 |
|  | Top 10 Average | 4.3 | 4.1 | 3.8 | 3.6 | 3.5 | 3.5 | 3.7 | 3.5 |
|  | Bottom 10 Average | 2.7 | 2.4 | 2.3 | 2.5 | 2.6 | 2.5 | 2.4 | 2.5 |
| 9. Treasury Note Yield, 5-Yr | consensus | 3.5 | 3.4 | 3.3 | 3.3 | 3.3 | 3.2 | 3.3 | 3.3 |
|  | Top 10 Average | 4.3 | 4.2 | 4.1 | 3.9 | 3.8 | 3.8 | 3.9 | 3.8 |
|  | Bottom 10 Average | 2.8 | 2.6 | 2.5 | 2.7 | 2.7 | 2.7 | 2.6 | 2.8 |
| 10. Treasury Note Yield, 10-Yr | CONSENSUS | 3.5 | 3.5 | 3.4 | 3.5 | 3.5 | 3.4 | 3.5 | 3.5 |
|  | Top 10 Average | 4.4 | 4.4 | 4.2 | 4.2 | 4.1 | 4.1 | 4.2 | 4.1 |
|  | Bottom 10 Average | 2.8 | 2.5 | 2.6 | 2.9 | 2.9 | 2.8 | 2.7 | 2.8 |
| 11. Treasury Bond Yield, 30-Yr | CONSENSUS | 3.8 | 3.8 | 3.8 | 3.9 | 3.8 | 3.8 | 3.8 | 3.9 |
|  | Top 10 Average | 4.6 | 4.7 | 4.5 | 4.5 | 4.4 | 4.5 | 4.5 | 4.5 |
|  | Bottom 10 Average | 3.0 | 2.9 | 3.0 | 3.3 | 3.2 | 3.2 | 3.1 | 3.2 |
| 12. Corporate A aa Bond Yield | CONSENSUS | 5.0 | 5.0 | 4.9 | 5.0 | 5.0 | 4.9 | 4.9 | 5.0 |
|  | Top 10 Average | 5.7 | 5.7 | 5.6 | 5.5 | 5.5 | 5.5 | 5.5 | 5.6 |
|  | Bottom 10 Average | 4.4 | 4.2 | 4.3 | 4.4 | 4.4 | 4.4 | 4.3 | 4.4 |
| 13. Corporate Baa Bond Yield | CONSENSUS | 6.0 | 5.9 | 5.8 | 5.9 | 5.9 | 5.9 | 5.9 | 5.9 |
|  | Top 10 Average | 6.6 | 6.6 | 6.4 | 6.3 | 6.3 | 6.3 | 6.4 | 6.4 |
|  | Bottom 10 Average | 5.4 | 5.3 | 5.2 | 5.4 | 5.4 | 5.4 | 5.3 | 5.4 |
| 14. State \& Local Bonds Yield | CONSENSUS | 4.3 | 4.3 | 4.2 | 4.3 | 4.3 | 4.3 | 4.3 | 4.3 |
|  | Top 10 Average | 5.0 | 5.0 | 4.8 | 4.8 | 4.7 | 4.7 | 4.8 | 4.8 |
|  | Bottom 10 Average | 3.7 | 3.7 | 3.7 | 3.9 | 3.9 | 3.9 | 3.8 | 3.9 |
| 15. Home Mortgage Rate | CONSENSUS | 5.7 | 5.5 | 5.4 | 5.4 | 5.4 | 5.4 | 5.4 | 5.4 |
|  | Top 10 Average | 6.4 | 6.4 | 6.1 | 6.0 | 6.0 | 6.0 | 6.1 | 6.0 |
|  | Bottom 10 Average | 4.9 | 4.7 | 4.6 | 4.8 | 4.8 | 4.8 | 4.7 | 4.8 |
| A. Fed's AFE Nominal \$ Index | CONSENSUS | 113.8 | 112.8 | 111.9 | 111.0 | 110.6 | 110.4 | 111.3 | 109.8 |
|  | Top 10 Average | 115.6 | 114.7 | 114.0 | 113.4 | 113.1 | 112.8 | 113.6 | 112.7 |
|  | Bottom 10 Average | 112.2 | 111.0 | 109.9 | 108.8 | 108.2 | 107.9 | 109.2 | 107.4 |
|  |  |  | ------- | -Over | \% Chan |  |  | Five-Year | verages |
|  |  | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2024-2028 | 2029-2033 |
| B. Real GDP | CONSENSUS | 2.0 | 2.0 | 2.1 | 2.1 | 2.1 | 2.1 | 2.1 | 2.0 |
|  | Top 10 Average | 2.6 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.4 | 2.3 |
|  | Bottom 10 Average | 1.5 | 1.5 | 1.8 | 1.8 | 1.8 | 1.8 | 1.7 | 1.8 |
| C. GDP Chained Price Index | CONSENSUS | 3.0 | 2.4 | 2.3 | 2.3 | 2.2 | 2.2 | 2.3 | 2.2 |
|  | Top 10 Average | 3.7 | 2.8 | 2.7 | 2.6 | 2.6 | 2.6 | 2.7 | 2.6 |
|  | Bottom 10 Average | 2.3 | 2.0 | 1.9 | 1.9 | 1.9 | 1.9 | 1.9 | 1.9 |
| D. Consumer Price Index | CONSENSUS | 3.2 | 2.4 | 2.4 | 2.4 | 2.3 | 2.3 | 2.4 | 2.3 |
|  | Top 10 Average | 4.1 | 3.0 | 2.9 | 2.8 | 2.7 | 2.7 | 2.8 | 2.7 |
|  | Bottom 10 Average | 2.3 | 1.8 | 2.0 | 2.0 | 1.9 | 1.9 | 1.9 | 1.9 |
| E. PCE Price Index | consensus | 3.0 | 2.3 | 2.3 | 2.3 | 2.3 | 2.2 | 2.3 | 2.3 |
|  | Top 10 Average | 3.8 | 2.8 | 2.8 | 2.7 | 2.7 | 2.6 | 2.7 | 2.7 |
|  | Bottom 10 Average | 2.2 | 1.8 | 1.9 | 1.9 | 1.9 | 1.8 | 1.9 | 1.9 |



Carolina Water Service Inc. of North Carolina
Derivation of Mean Equity Risk Premium Based Studies
Using Holding Period Returns and
Projected Market Appreciation of the S\&P Utility Index

| ne No. |  |
| :---: | :---: |
| 1. | Equity Risk Premium based on S\&P Utility Index <br> Holding Period Returns (1): |
| 2. | Historical Equity Risk Premium <br> Regression of Historical Equity Risk Premium <br> (2) |
| 3. | Forecasted Equity Risk Premium Based on <br> PRPM (3) |
| 4. | Forecasted Equity Risk Premium based on <br> Projected Total Return on the S\&P Utilities <br> Index (Value Line Data) (4) |
| 5. | Forecasted Equity Risk Premium based on <br> Projected Total Return on the S\&P Utilities <br> Index (Bloomberg Data) (5) |
| 6. | Average Equity Risk Premium (6) |
| Notes provided on page 25 of this Schedule. |  |

Carolina Water Service Inc. of North Carolina<br>Derivation of Mean Equity Risk Premium Based Studies<br>Using Holding Period Returns and Projected Market Appreciation of the S\&P Utility Index

Notes:
(1) Based on S\&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1928-2021. 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 1928-2021 referenced in note 1 above. Using the equation generated from the regression, an expected equity risk premium is calculated using the relevant bond yield. The current and projected A2 rated utiliy bond yields are shown on lines 4 and 3 of page 15 of this Schedule, respectively.
(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 September 2022.
(4) The equity risk premium based on Value Line data for the S\&P Utilites Index subtracts the relevant bond yield from the expected market return of $9.53 \%$, which was derived using expected dividend yields to represent the income return and expected earnings growth to represent the capital appreciation return.
(5) The equity risk premium based on Bloomberg data for the S\&P Utilites Index subtracts the relevant bond yield from the expected market return of $11.24 \%$, which was derived using expected dividend yields to represent the income return and expected earnings growth to represent the capital appreciation return.
(6) Average of lines 1 through 5.
$\infty$

S



$$
\begin{gathered}
{[2]} \\
\\
\text { Bloomberg } \\
\text { Adjusted Beta } \\
\hline \\
0.74 \\
0.89 \\
0.81 \\
0.86 \\
0.75 \\
0.72
\end{gathered}
$$

Proxy Group of Six Water Companies
American States Water Company
American Water Works Company, Inc.
California Water Service Group
Essential Utilities Inc.
Middlesex Water Company
SJW Group
Mean
Average of Mean and Median
Notes on page 30 of this Schedule.
$\infty$

$\pm$


Proxy Group of Six Water Companies
American States Water Company
American Water Works Company, Inc.
California Water Service Group
Essential Utilities Inc.
Middlesex Water Company
SJW Group
Mean
Average of Mean and Median
Notes on page 30 of this Schedule.



$\sqrt{2}$

Carolina Water Service Inc. of North Carolina
Indicated Common Equity Cost Rate Through Use
of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)
[6]

| of <br> Proxy Group of Six Water Companies | Carolina Water Service Inc. of North Carolina Indicated Common Equity Cost Rate Through Use e Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM) Using Projected 2024 Interest Rates |  |  |  |  |  |  | [8] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | [1] | [2] | [3] | [4] | [5] | [6] | [7] |  |
|  | Value Line <br> Adjusted <br> Beta | Bloomberg Adjusted Beta | Average Beta | Market Risk <br> Premium (1) | Risk-Free Rate (4) | Traditional CAPM Cost Rate | ECAPM Cost Rate | Indicated Common Equity Cost Rate (6) |
| American States Water Company | 0.65 | 0.74 | 0.70 | 10.22 \% | 3.80 \% | 10.96 \% | 11.72 \% | 11.34 \% |
| American Water Works Company, Inc. | 0.90 | 0.89 | 0.90 | 10.22 | 3.80 | 13.00 | 13.26 | 13.13 |
| California Water Service Group | 0.70 | 0.81 | 0.75 | 10.22 | 3.80 | 11.47 | 12.11 | 11.79 |
| Essential Utilities Inc. | 0.95 | 0.86 | 0.91 | 10.22 | 3.80 | 13.10 | 13.33 | 13.22 |
| Middlesex Water Company | 0.70 | 0.75 | 0.72 | 10.22 | 3.80 | 11.16 | 11.88 | 11.52 |
| SJW Group | 0.80 | 0.72 | 0.76 | 10.22 | 3.80 | 11.57 | 12.18 | 11.88 |
| Mean |  |  | 0.79 |  |  | 11.88 \% | 12.41 \% | 12.15 \% |
| Median |  |  | 0.76 |  |  | 11.52 \% | 12.15 \% | 11.84 \% |
| Average of Mean and Median |  |  | 0.78 |  |  | 11.70 \% | 12.28 \% | 12.00 \% |




| of <br> Proxy Group of Six Water Companies | Carolina Water Service Inc. of North Carolina Indicated Common Equity Cost Rate Through Use e Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM) Using Projected 2024 Interest Rates |  |  |  |  |  |  | [8] |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | [1] | [2] | [3] | [4] | [5] | [6] | [7] |  |
|  | Value Line <br> Adjusted <br> Beta | Bloomberg Adjusted Beta | Average Beta | Market Risk <br> Premium (1) | Risk-Free Rate (4) | Traditional CAPM Cost Rate | ECAPM Cost Rate | Indicated Common Equity Cost Rate (6) |
| American States Water Company | 0.65 | 0.74 | 0.70 | 10.22 \% | 3.80 \% | 10.96 \% | 11.72 \% | 11.34 \% |
| American Water Works Company, Inc. | 0.90 | 0.89 | 0.90 | 10.22 | 3.80 | 13.00 | 13.26 | 13.13 |
| California Water Service Group | 0.70 | 0.81 | 0.75 | 10.22 | 3.80 | 11.47 | 12.11 | 11.79 |
| Essential Utilities Inc. | 0.95 | 0.86 | 0.91 | 10.22 | 3.80 | 13.10 | 13.33 | 13.22 |
| Middlesex Water Company | 0.70 | 0.75 | 0.72 | 10.22 | 3.80 | 11.16 | 11.88 | 11.52 |
| SJW Group | 0.80 | 0.72 | 0.76 | 10.22 | 3.80 | 11.57 | 12.18 | 11.88 |
| Mean |  |  | 0.79 |  |  | 11.88 \% | 12.41 \% | 12.15 \% |
| Median |  |  | 0.76 |  |  | 11.52 \% | 12.15 \% | 11.84 \% |
| Average of Mean and Median |  |  | 0.78 |  |  | 11.70 \% | 12.28 \% | 12.00 \% |


| Proxy Group of Six Water Companies | Indicated Common Equity Cost Rate Through Use <br> of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM) Using Projected 2024 Interest Rates |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | [1] | [2] | [3] | [4] | [5] | [6] | [7] | [8] |
|  | Value Line Adjusted Beta | Bloomberg Adjusted Beta | Average <br> Beta | Market Risk <br> Premium (1) | Risk-Free <br> Rate (4) | Traditional CAPM Cost Rate | ECAPM Cost <br> Rate | Indicated Common Equity Cost Rate (6) |
| American States Water Company | 0.65 | 0.74 | 0.70 | 10.22 \% | 3.80 \% | 10.96 \% | 11.72 \% | 11.34 \% |
| American Water Works Company, Inc. | 0.90 | 0.89 | 0.90 | 10.22 | 3.80 | 13.00 | 13.26 | 13.13 |
| California Water Service Group | 0.70 | 0.81 | 0.75 | 10.22 | 3.80 | 11.47 | 12.11 | 11.79 |
| Essential Utilities Inc. | 0.95 | 0.86 | 0.91 | 10.22 | 3.80 | 13.10 | 13.33 | 13.22 |
| Middlesex Water Company | 0.70 | 0.75 | 0.72 | 10.22 | 3.80 | 11.16 | 11.88 | 11.52 |
| SJW Group | 0.80 | 0.72 | 0.76 | 10.22 | 3.80 | 11.57 | 12.18 | 11.88 |
| Mean |  |  | 0.79 |  |  | 11.88 \% | 12.41 \% | 12.15 \% |
| Median |  |  | 0.76 |  |  | 11.52 \% | 12.15 \% | 11.84 \% |
| Average of Mean and Median |  |  | 0.78 |  |  | 11.70 \% | 12.28 \% | 12.00 \% |






Carolina Water Service Inc. of North Carolina
Indicated Common Equity Cost Rate Through Use
of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)
$\stackrel{\square}{6}$



[4]

$$
\bar{m}
$$

$$
[2]
$$

Proxy Group of Six Water Companies
American States Water Company
American Water Works Company, Inc.
California Water Service Group
Essential Utilities Inc.
Middlesex Water Company
SJW Group
Mean
Mverage of Mean and Median
Notes on page 30 of this Schedule.

Notes on page 30 of this Schedule.

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:

|  | Using <br> Projected <br> Projected <br> 2025 Interest <br> Rates |
| :--- | :--- | :--- | :--- |
| Historical Data MRP Estimates: |  |

## Value Line MRP Estimates:

Measure 4: Value Line Projected MRP (Thirteen weeks ending October 14, 2022)

| Total projected return on the market 3-5 years hence*: | 16.03 | \% | 16.03 | \% | 16.03 | \% | 16.03 | \% |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Projected Risk-Free Rate (see note 2): | 3.26 |  | 3.88 |  | 3.80 |  | 3.80 |  |
| MRP based on Value Line Summary \& Index: | 12.77 | \% | 12.15 | \% | 12.23 | \% | 12.23 | \% |
| *Forcasted 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: | 16.66 | \% | 16.66 | \% | 16.66 | \% | 16.66 | \% |
| Projected Risk-Free Rate (see note 2): | 3.26 |  | 3.88 |  | 3.80 |  | 3.80 |  |
| MRP based on Value Line data | 13.40 | \% | 12.78 | \% | 12.86 | \% | 12.86 | \% |
| Measure 6: Bloomberg Projected MRP |  |  |  |  |  |  |  |  |
| Total return on the Market based on the S\&P 500: | 12.54 | \% | 12.54 | \% | 12.54 | \% | 12.54 | \% |
| Projected Risk-Free Rate (see note 2): | 3.26 |  | 3.88 |  | 3.80 |  | 3.80 |  |
| MRP based on Bloomberg data | 9.28 | \% | 8.66 | \% | 8.74 | \% | 8.74 | \% |
| Average of Value Line, Ibbotson, and Bloomberg MRP: | 10.59 | \% | 10.17 | \% | 10.22 | \% | 10.22 | \% |

(2) Three-month average on 30-year Treasury bond yield ended September, 2022 as shown below:

| Jul-22 | $3.10 \%$ |
| ---: | ---: |
| Aug-22 | 3.13 |
| Sep-22 | 3.56 |
|  | 3.26 |

(3) 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 22-23 of this Schedule.) The projection of the 2023 risk-free rate is illustrated below:

| First Quarter 2023 | $3.90 \%$ |
| ---: | :---: |
| Second Quarter 2023 | 4.00 |
| Third Quarter 2023 | 3.90 |
| Fourth Quarter 2023 | 3.80 |
| 2023 Consensus | 3.80 |

(4) The projection of the 2024 risk-free rate is illustrated below:

2024 Consensus
(5) The projection of the 2025 risk-free rate is illustrated below:

$$
2025 \text { Consensus } \quad 3.80 \%
$$

(6) Average of Column 6 and Column 7.

Sources of Information:
Value Line Summary and Index
Blue Chip Financial Forecasts, June 1, 2022 and September 30, 2022
Kroll 2022 SBBI® Yearbook
Bloomberg Professional Services

Carolina Water Service Inc. of North Carolina. 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 twenty-seven 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 $0.49-0.77$ and residual standard error of the regression range of 2.8333 - 3.3793 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 0.1365 . The standard deviation of the standard error of the regression is calculated as follows:

Standard Deviation of the Std. Err. of the Regr. = Standard Error of the Regression

$$
\sqrt{2 N}
$$

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

$$
\text { Thus, } 0.1365=\frac{3.1063}{\sqrt{518}}=\frac{3.1063}{22.7596}
$$

Carolina Water Service Inc. of North Carolina
Basis of Selection of Comparable Risk
Domestic Non-Price Regulated Companies

|  | [1] | [2] | [3] | [4] |
| :---: | :---: | :---: | :---: | :---: |
| Proxy Group of Six Water Companies | Value Line <br> Adjusted <br> Beta | Unadjusted Beta | Residual <br> Standard <br> Error of the <br> Regression | Standard Deviation of Beta |
| American States Water Company | 0.65 | 0.44 | 2.6059 | 0.0604 |
| American Water Works Company, Inc. | 0.90 | 0.78 | 3.3488 | 0.0776 |
| California Water Service Group | 0.70 | 0.48 | 3.1091 | 0.0721 |
| Essential Utilities Inc. | 0.95 | 0.91 | 2.7564 | 0.0639 |
| Middlesex Water Company | 0.70 | 0.51 | 3.4761 | 0.0806 |
| SJW Group | 0.80 | 0.65 | 3.3417 | 0.0775 |
| Average | 0.78 | 0.63 | 3.1063 | 0.0720 |
| Beta Range ( $+/-2$ std. Devs. of Beta) | 0.49 | 0.77 |  |  |
| 2 std. Devs. of Beta | 0.14 |  |  |  |
| Residual Std. Err. Range ( $+/-2$ std. Devs. of the Residual Std. Err.) | 2.8333 | 3.3793 |  |  |
| Std. dev. of the Res. Std. Err. | 0.1365 |  |  |  |
| 2 std. devs. of the Res. Std. Err. | 0.2730 |  |  |  |

## Carolina Water Service Inc. of North Carolina

Proxy Group of Non-Price Regulated Companies
Comparable in Total Risk to the
Proxy Group of Six Water Companies

|  | [1] | [2] | [3] | [4] |
| :---: | :---: | :---: | :---: | :---: |
| Proxy Group of Twenty-Seven NonPrice Regulated Companies | Value Line Adjusted Beta | Unadjusted Beta | Residual <br> Standard <br> Error of the <br> Regression | Standard Deviation of Beta |
| Balchem Corp. | 0.75 | 0.56 | 3.3474 | 0.0776 |
| Becton, Dickinson | 0.75 | 0.59 | 2.9969 | 0.0695 |
| Black Knight, Inc. | 0.75 | 0.56 | 3.1415 | 0.0728 |
| Booz Allen Hamilton | 0.85 | 0.76 | 3.1644 | 0.0733 |
| Bristol-Myers Squibb | 0.85 | 0.70 | 2.9185 | 0.0676 |
| C.H. Robinson | 0.70 | 0.54 | 3.3437 | 0.0775 |
| Chemed Corp. | 0.80 | 0.66 | 2.8403 | 0.0658 |
| CSG Systems Int'l | 0.75 | 0.56 | 2.8967 | 0.0671 |
| CSW Industrials | 0.85 | 0.76 | 3.0218 | 0.0700 |
| Heartland Express | 0.70 | 0.51 | 3.0304 | 0.0702 |
| Henry (Jack) \& Assoc | 0.85 | 0.70 | 2.9759 | 0.0690 |
| Lilly (Eli) | 0.80 | 0.63 | 3.3732 | 0.0782 |
| McCormick \& Co. | 0.75 | 0.62 | 3.0694 | 0.0711 |
| Merck \& Co. | 0.80 | 0.63 | 2.9122 | 0.0675 |
| Monster Beverage | 0.85 | 0.76 | 2.9657 | 0.0687 |
| NewMarket Corp. | 0.75 | 0.59 | 2.9165 | 0.0676 |
| Northrop Grumman | 0.80 | 0.67 | 3.3239 | 0.0770 |
| Oracle Corp. | 0.80 | 0.67 | 2.8812 | 0.0668 |
| Pfizer, Inc. | 0.80 | 0.69 | 2.9056 | 0.0673 |
| Progressive Corp. | 0.75 | 0.60 | 3.0605 | 0.0709 |
| Quest Diagnostics | 0.80 | 0.62 | 3.2991 | 0.0765 |
| RLI Corp. | 0.75 | 0.62 | 2.9185 | 0.0676 |
| Rollins, Inc. | 0.85 | 0.71 | 3.2681 | 0.0758 |
| Selective Ins. Group | 0.85 | 0.76 | 3.0002 | 0.0695 |
| Watsco, Inc. | 0.85 | 0.73 | 2.8872 | 0.0669 |
| Werner Enterprises | 0.75 | 0.56 | 3.3343 | 0.0773 |
| Western Union | 0.80 | 0.68 | 3.0050 | 0.0697 |
| Average | 0.79 | 0.65 | 3.0666 | 0.0711 |
| Proxy Group of Six Water Companies | 0.78 | 0.63 | 3.1063 | 0.0720 |



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Carolina Water Service Inc. of North Carolina





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(1) The application of the DCF model to the domestic, non-price regluated comparable risk companies is identical to the application of the DCF to the
utility proxy group. The dividend yield is derived by using the 60 day average price and the spot indicated dividend as of October 14,2022 . 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. Value Line Investment Survey
www.zacks.com Downloaded on 10/14/2022
www.yahoo.com Downloaded on 10/14/2022

| Carolina Water Service Inc. of North Carolina Indicated Common Equity Cost Rate Through Use of a Risk Premium Model Using an Adjusted Total Market Approach |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Line No. |  | Proxy Group of Twenty-Seven Non-Price Regulated Companies | Results using Projected 2023 Interest Rates | Results using Projected 2024 Interest Rates | Results using <br> Projected 2025 <br> Interest Rates |
| 1. | Prospective Yield on Baa2 Rated Corporate Bonds | - | 6.32 \% (1) | 5.90 \% (2) | 5.80 \% (3) |
| 2. | Current Yield on Baa2 Rated Corporate Bonds (4) | 5.35 \% | - | - | - |
| 3. | Adjustment to Reflect Bond rating Difference of Non-Price Regulated Companies (5) | (0.17) | (0.17) | (0.17) | (0.17) |
| 4. | Adjusted Prospective Bond Yield | 5.18 | 6.15 | 5.73 | 5.63 |
| 5. | Equity Risk Premium (6) | 7.34 | 6.84 | 7.00 | 7.05 |
| 6. | Risk Premium Derived Common Equity Cost Rate | 12.52 \% | 12.99 \% | 12.73 \% | 12.68 \% |

(1) Average forecast of 2023 Baa2 corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated June 1, 2022 and September 30, 2022 (see pages 22 and 23 of this Schedule). The estimates are detailed below.

| First Quarter 2023 | $6.40 \%$ |
| ---: | :---: |
| Second Quarter 2023 | 6.50 |
| Third Quarter 2023 | 6.40 |
| Fourth Quarter 2023 | 6.30 |
| 2023 Consensus | 6.00 |
| Average | 6.32 |

(2) The projection of the 2024 Baa2 coporate bond is illustrated below:

$$
2024 \text { Consensus } \quad 5.90 \%
$$

(3) The projection of the 2025 Baa2 coporate bond is illustrated below:
2025 Consensus $\quad 5.80$ \%
(4) Three-month average Baa2 corporate bond yield ended September, 2022 as reported by Bloomberg Professional Services shown below:

| Jul-22 | $5.21 \%$ |
| ---: | :---: |
| Aug-22 | 5.15 |
| Sep-22 | 5.68 |
| Average | 5.35$\%$ |

(5) The average yield spread of Baa rated corporate bonds over A corporate bonds for the three months ending September 2022. To reflect the Baa1 average rating of the non-utility proxy group, the prosepctive yield on Baa corporate bonds must be adjusted by $1 / 3$ of the spread between A and Baa corporate bond yields as shown below:

|  | A Corp. <br> Bond Yield | Baa Corp. <br> Bond Yield | Spread |
| ---: | :---: | ---: | :---: |
| Sep-22 | $5.16 \%$ | $5.68 \%$ | 0.52 |
| Aug-22 | 4.65 | 5.15 | 0.50 |
| Jul-22 | 4.67 | 5.21 | 0.54 |
|  | Average yield spread |  | 0.52 |
|  |  | $1 / 3$ of spread | 0.17 |

(6) From page 38 of this Schedule.

Moody's
Long-Term Issuer Rating
October 2022
Standard \& Poor's Long-Term Issuer Rating

October 2022

| Proxy Group of Twenty-Seven |
| :--- |
| Non-Price Regulated Companies |

## Balchem Corp.

Becton, Dickinson
Black Knight, Inc.
Booz Allen Hamilton
Bristol-Myers Squibb
C.H. Robinson

Chemed Corp.
CSG Systems Int'l
CSW Industrials
Heartland Express
Henry (Jack) \& Assoc
Lilly (Eli)
McCormick \& Co.
Merck \& Co.
Monster Beverage
NewMarket Corp.
Northrop Grumman
Oracle Corp.
Pfizer, Inc.
Progressive Corp.
Quest Diagnostics
RLI Corp.
Rollins, Inc.
Selective Ins. Group
Watsco, Inc.
Werner Enterprises
Western Union

Average

| Long-Term |
| :---: |
| Issuer |
| Rating |

NA

Baa2
Ba3
NA
A2
Baa2
WR
NA
NA
NA
NA
A2
Baa2
A1
NA
Baa2
Baa1
Baa2
A2

| A2 | 6.0 |
| :---: | :---: |
| Baa2 | 9.0 |
| Baa2 | 9.0 |
| NA | -- |
| Baa2 | 9.0 |
| NA | -- |
| NA | -- |
| Baa2 | 9.0 |
|  |  |
| Baa1 | 8.2 |


| Numerical |
| :---: |
| Weighting (1) |
| -- |
| 9.0 |
| 13.0 |
| -- |
| 6.0 |
| 9.0 |
| -- |
| -- |
| -- |
| -- |
| -- |
| 6.0 |
| 9.0 |
| 5.0 |
| -- |
| 9.0 |
| 8.0 |
| 9.0 |
| 6.0 |
| 6.0 |
| 9.0 |
| 9.0 |
| -- |
| 9.0 |
| -- |
| -- |
| 9.0 |
| 8.2 |


| Long-Term |  |
| :---: | :---: |
| Issuer | Numerical |
| Rating | Weighting (1) |
| NA | -- |
| BBB | 9.0 |
| BB | 12.0 |
| NA | -- |
| A+ | 5.0 |
| BBB+ | 8.0 |
| NR | -- |
| BB+ | 11.0 |
| NA | -- |
| NA | -- |
| NA | -- |
| A+ | 5.0 |
| BBB | 9.0 |
| A+ | 5.0 |
| NA | -- |
| BBB+ | 8.0 |
| BBB+ | 8.0 |
| BBB | 9.0 |
| A+ | 5.0 |
| A | 6.0 |
| BBB+ | 8.0 |
| BBB | 9.0 |
| NA | -- |
| BBB | 9.0 |
| NA | -- |
| NA | -- |
| BBB | 9.0 |
| BBB+ | 7.9 |

Notes:
(1) From page 18 of this Schedule.

Source of Information:
Bloomberg Professional Services





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| :---: | :---: |
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Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Six Water Companies
Using 2023 Projected Interest Rates

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Risk-Free Rate $\underset{\sim}{\infty} \underset{\sim}{\infty} \underset{\sim}{\infty}$

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& \bar{\sim}
\end{aligned}
$$

$$
\begin{aligned}
& \Xi
\end{aligned}
$$


 Proxy Group of Twenty-Seven Non-
Price Regulated Companies Balchem Corp.
Becton, Dickinson
Black Knight, Inc. ${ }^{\text {Booz Allen Hamilton }}$ Boczol-Myers Squibb
C.i.
C. Rebinson C.H. Robinson
Chemed Corp. CSG Systems Int'1 CSW Industrials
Heartland Express Heartland Express
Henry (Jack) \& Assoc Lilly (Eli) McCormick \& Co.
Merck \& Co. Monster Beverage
NewMarket Corp. Northrop Grumman Oracle Corp. Progressive Corp.
Quest Diagnostics Quest Diagnostics
RLI Corp. Rolective Ins. Group
Sel Werner Enterprises
Western Union Western Union
Notes:
(1) From page 30, note 1, of this Schedule. (2) From page 30, note 2, of this Schedule.
(3) Average of CAPM and ECAPM cost rates.

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Carolina Water Service Inc．of North Carolina
Traditional CAPM and ECAPM Results for the Proxy Group of Non－Price－Regulated Companies Comparable in Total Risk to the Proxy Group of Six Water Companies
Using 2024 Projected Interest Rates

[1]


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| Proxy Group of Twenty-Seven Non- |
| :--- |
| Price Regulated Companies |
|  |
| Balchem Corp. |
| Becton, Dickinson |
| Black Knight, Inc. |
| Booz Allen Hamilton |
| Bristol-Myers Squibb |
| C.H. Robinson |
| Chemed Corp. |
| CSG Systems Int'l |
| CSW Industrials |
| Heartland Express |
| Henry (Jack) \& Assoc |
| Lilly (Eli) |
| McCormick \& Co. |
| Merck \& Co. |
| Monster Beverage |
| NewMarket Corp. |
| Northrop Grumman |
| Oracle Corp. |
| Pfizer, Inc. |
| Progressive Corp. |
| Quest Diagnostics |
| RLI Corp. |
| Rollins, Inc. |
| Selective Ins. Group |
| Watsco, Inc. |
| Werner Enterprises |
| Western Union |


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Carolina Water Service Inc．of North Carolina
Traditional CAPM and ECAPM Results for the Proxy Group of Non－Price－Regulated Companies Comparable in Total Risk to the Proxy Group of Six Water Companies
Using 2025 Projected Interest Rates

[1]


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| Proxy Group of Twenty-Seven Non- |
| :--- |
| Price Regulated Companies |
|  |
| Balchem Corp. |
| Becton, Dickinson |
| Black Knight, Inc. |
| Booz Allen Hamilton |
| Bristol-Myers Squibb |
| C.H. Robinson |
| Chemed Corp. |
| CSG Systems Int'l |
| CSW Industrials |
| Heartland Express |
| Henry (Jack) \& Assoc |
| Lilly (Eli) |
| McCormick \& Co. |
| Merck \& Co. |
| Monster Beverage |
| NewMarket Corp. |
| Northrop Grumman |
| Oracle Corp. |
| Pfizer, Inc. |
| Progressive Corp. |
| Quest Diagnostics |
| RLI Corp. |
| Rollins, Inc. |
| Selective Ins. Group |
| Watsco, Inc. |
| Werner Enterprises |
| Western Union |



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Sources:

1. From Hi
${ }^{1 .}$ From Hinton Exhibit 3.
${ }^{2}$ From Hinton Exhibit 3.
${ }^{3}$ From Hinton Exhibit 3.
${ }^{4}$ Excluding the DCF model results for indicated ROEs less than the yield on A-rated utility bonds.

Carolina Water Service Inc of North Carolina
Prediction of Equity Risk Premiums Relative to
Moody's A Rated Utility Bond Yields


| Constant | Slope | Prospective A2 Rated Utility Bond <br> (1) | Prospective <br> Equity Risk <br> Premium | Indicated ROE |
| :---: | :---: | :---: | :---: | :---: |
| 8.60686 \% | -0.74187 | 5.88 \% | 4.24 \% | 10.12 \% |
| Constant | Slope | Current A2 Rated Utility Bond (2) | Current Equity Risk Premium | Indicated ROE |
| 8.60686 \% | -0.74187 | 4.93 \% | 4.95 \% | 9.88 \% |

## Carolina Water Service Inc of North Carolina <br> Prediction of Equity Risk Premiums Relative to Moody's A Rated Utility Bond Yields

Notes:
(1) The prospective A2 rated utility bond is the average forecast of Aaa rated corporate bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts, adjusted to reflect the average yield spread of A2 rated public utility bonds over Aaa rated corporate bonds (see pages 3 and 4 of this Schedule). The prospective A2 rated utility bond is illustrated below:

| Fourth Quarter 2022 | $5.00 \%$ |
| ---: | :--- |
| First Quarter 2023 | 5.40 |
| Second Quarter 2023 | 5.40 |
| Third Quarter 2023 | 5.40 |
| Fourth Quarter 2023 | 5.20 |
| First Quarter 2024 | 5.10 |
| $2024-2028$ | 4.90 |
| 2029-2033 | 5.00 |
| Average: | $5.18 \%$ |


|  | Aaa Rated <br> Corporate Bond | A2 Rated Public Utility Bond |
| :---: | :---: | :---: |
| Sep-2022 | 4.57 \% | 5.26 \% |
| Aug-2022 | 4.07 | 4.76 |
| Jul-2022 | 4.06 | 4.78 |
| Average | 4.23 \% | 4.93 \% |

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:
0.70 \%

Adjusted Prospective Yield on A2 Rated Public Utility Bonds:
$5.88 \%$
(2) Three-month average on Moody's A-rated Utility bond yield ended September, 2022 as shown below:

| Sep-2022 | $5.26 \%$ |
| ---: | :--- |
| Aug-2022 | 4.76 |
| Jul-2022 | 4.78 |
| Average | 4.93 |

Sources of Information:
Blue Chip Financial Forecasts September 30, 2022 and June 1, 2022
Regulatory Research Associates
Bloomberg Professional Services

Sources:
${ }^{1}$ Value Line Investment Survey, October 7, 2022.

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## Notes

(1) Hinton Direct Testimony
(2) Column (a) x Column (b)
(3) Recommended ROE as shown on Direct Schedule DWD-1, page 1.
(4) Overall Equity Cost Rate x Tax Conversion Factor


[^0]:    The Coefficient of Variation is used by investors and economists to determine volatility. The annualized standard deviation of daily price movements.

[^1]:    $4 \quad$ Transcript of Chair Powell's Press Conference, November 2, 2022.
    As noted by Mr. Hinton on page 16 of his Direct Testimony.

[^2]:    13
    Transcript of Chair Powell's Press Conference, November 2, 2022. [clarification and emphasis added]

[^3]:    15 Hinton Testimony, at 5.
    16 Hinton Testimony, at 5.
    17 Hinton Testimony, at 5.
    18 Joint Testimony, at 62.

[^4]:    26 Average A-rated utility bond yield for September 2022 as shown on page 16 of Schedule DWD-1R. Hinton Exhibit 4.

[^5]:    28 Hinton Direct Testimony, at 30.
    Hinton Direct Testimony, at 36-37.
    Opinion No. 531, 147 FERC $\mathbb{T}$ 61,234 at P 88.

    Rebuttal Testimony of Dylan W. D’Ascendis

[^6]:    37
    Kroll, Cost of Capital Navigator: U.S. Cost of Capital Module, Size as a Predictor of Returns, at 1.

[^7]:    Joint Testimony, at 19.
    D'Ascendis Direct Testimony, at 4.
    Joint Testimony, at 63-64.
    Joint Testimony, at 63.
    Joint Testimony, at 63-64.

[^8]:    52 Fully forecasted test years would also have been reflected in the market data of the York Water Company, as used in the Utility Proxy Group in my Direct Testimony, Joint Testimony, at 64-65.

[^9]:    54 Joint Testimony，at 66. Joint Testimony，at 67.

