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April 2, 2024

ELECTRONIC FILING

Mr. Adam J. Teitzman, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket 20240026-EI; Petition for Rate Increase by Tampa Electric Company

Dear Mr. Teitzman:

Attached for filing on behalf of Tampa Electric Company in the above-referenced docket is the Direct Testimony of Dylan D'Ascendis and Exhibit No. DD-1.

Thank you for your assistance in connection with this matter.

(Document 14 of 32)

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeffrey Wahlen', with a long horizontal flourish extending to the right.

J. Jeffrey Wahlen

cc: All parties

JJW/ne
Attachment

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20240026-EI

IN RE: PETITION FOR RATE INCREASE
BY TAMPA ELECTRIC COMPANY

DIRECT TESTIMONY AND EXHIBIT
OF
DYLAN W. D'ASCENDIS, CRRA, CVA
ON BEHALF OF TAMPA ELECTRIC COMPANY

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OF
DYLAN W. D'ASCENDIS, CRRA, CVA
ON BEHALF OF TAMPA ELECTRIC COMPANY

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1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2 **PREPARED DIRECT TESTIMONY**

3 **OF**

4 **DYLAN W. D'ASCENDIS, CRRA, CVA**

5 **ON BEHALF OF TAMPA ELECTRIC COMPANY**

6
7 **I. INTRODUCTION AND PURPOSE**

8 **Q.** Please state your name, affiliation, and business address.

9
10 **A.** My name is Dylan W. D'Ascendis. I am a Partner at
11 ScottMadden, Inc. My business address is 3000 Atrium Way,
12 Suite 200, Mount Laurel, New Jersey 08054.

13
14 **Q.** On whose behalf are you submitting this testimony?

15
16 **A.** I am submitting this direct testimony before the Florida
17 Public Service Commission ("Commission") on behalf of Tampa
18 Electric Company ("Tampa Electric" or the "company").

19
20 **Q.** Please summarize your educational background and
21 professional experience.

22
23 **A.** I have offered expert testimony on behalf of investor-owned
24 utilities before over 35 state regulatory commissions in the
25 United States, in addition to the Federal Energy Regulatory

1 Commission, the Alberta Utility Commission, the Canadian
2 Energy Regulator, an American Arbitration Association panel,
3 and the Superior Court of Rhode Island, on issues including,
4 but not limited to, common equity cost rate, rate of return,
5 valuation, capital structure, class cost of service, and
6 rate design.

7
8 On behalf of the American Gas Association ("AGA"), I
9 calculate the AGA Gas Index, which serves as the benchmark
10 against which the performance of the American Gas Index Fund
11 ("AGIF") is measured on a monthly basis. The AGA Gas Index
12 and AGIF are a market capitalization weighted index and
13 mutual fund, respectively, comprised of the common stocks
14 of the publicly traded corporate members of the AGA.

15
16 I am a member of the Society of Utility and Regulatory
17 Financial Analysts ("SURFA"). In 2011, I was awarded the
18 professional designation "Certified Rate of Return Analyst"
19 by SURFA, which is based on education, experience, and the
20 successful completion of a comprehensive written
21 examination.

22
23 I am also a member of the National Association of Certified
24 Valuation Analysts ("NACVA") and was awarded the
25 professional designation "Certified Valuation Analyst" by

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the NACVA in 2015.

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

The details of my educational background and expert witness appearances are provided in Document No. 1 of Exhibit No. (DWD-1).

Q. What is the purpose of your prepared direct testimony in this proceeding?

A. The purpose of my direct testimony is to present evidence on behalf of Tampa Electric and recommend a return on equity ("ROE") to be used for ratemaking purposes in this proceeding.

Q. Have you prepared an exhibit in support of your prepared direct testimony?

A. Yes. My analyses and conclusions are supported by the data presented in Document Nos. 2 through 15 of Exhibit No. (DWD-

1) , which have been prepared by me or under my direction and supervision.

Document No. 1 Resume and Testimony Listing of Dylan W. D'Ascendis

Document No. 2 Summary of Common Equity Cost Rate

Document No. 3 Financial Profile of Tampa Electric Company and the Utility Proxy Group

Document No. 4 Application of the Discounted Cash Flow ("DCF") Model

Document No. 5 Application of the Risk Premium Model ("RPM")

Document No. 6 Application of the Capital Asset Pricing Model ("CAPM")

Document No. 7 Basis of Selection for the Non-Price Regulated Companies Comparable in Total Risk to the Utility Proxy Group

Document No. 8 Application of Cost of Common Equity Models to the Non-Price Regulated Proxy Group

Document No. 9 Derivation of the Flotation Cost Adjustment to the Cost of Common Equity

Document No. 10 Derivation of the Indicated Size Premium for Tampa Electric Company Relative to the Utility Proxy Group

1 Document No. 11 Service Area Maps of Tampa Electric and
2 the Utility Proxy Group
3 Document No. 12 National Risk Index of Utility Proxy
4 Group and Tampa Electric Company
5 Document No. 13 Comparison of Projected Capital
6 Expenditures Relative to Net Plant
7 Document No. 14 Fama & French - Figure 2
8 Document No. 15 Referenced Endnotes for the Prepared
9 Direct Testimony of Dylan W. D'Ascendis
10

11 **II. SUMMARY**

12 **Q.** What is your recommended ROE for Tampa Electric?
13

14 **A.** I recommend that the Commission authorize Tampa Electric the
15 opportunity to earn an ROE of 11.50 percent on its
16 jurisdictional rate base. The ratemaking capital structure
17 and cost of long-term debt is sponsored by Tampa Electric
18 witness Jeff Chronister.
19

20 **Q.** Please summarize the support for your recommended ROE for
21 Tampa Electric.
22

23 **A.** My recommended ROE of 11.50 percent is summarized in
24 Document No. 2. To support my ROE recommendation, I have
25 assessed the market-based common equity cost rates of

1 companies of relatively similar, but not necessarily
2 identical, risk to Tampa Electric. Using companies of
3 relatively comparable risk as proxies is consistent with the
4 principles of fair rate of return established by the United
5 States Supreme Court in two cases: (1) *Federal Power Comm'n*
6 *v. Hope Natural Gas Co.*, 320 U.S. 591 (1944) ("Hope"); and
7 (2) *Bluefield Water Works Improvement Co. v. Public Serv.*
8 *Comm'n*, 262 U.S. 679 (1923) ("Bluefield"). No proxy group
9 can be identical in risk to any single company.
10 Consequently, there must be an evaluation of relative risk
11 between the company and the proxy group to determine if it
12 is appropriate to adjust the proxy group's indicated rate
13 of return.

14
15 My recommendation results from applying several cost of
16 common equity models, specifically the DCF model, the RPM,
17 and the CAPM, to the market data of the Utility Proxy Group
18 whose selection criteria will be discussed below. In
19 addition, I applied the DCF model, RPM, and CAPM to the Non-
20 Price Regulated Proxy Group as discussed further below. The
21 results derived from each are summarized in Document No. 2.

22
23 As shown in Document No. 2, I adjusted the indicated common
24 equity cost rate to reflect the effect of flotation costs,
25 as well as the company's somewhat stronger credit rating as

1 compared to the Utility Proxy Group. These adjustments
2 resulted in a company-specific indicated range of common
3 equity cost rates between 9.90 percent and 12.49 percent.
4 The indicated range of ROEs applicable to the Utility Proxy
5 Group excluding the Predictive Risk Premium Model ("PRPM")
6 from the calculation of the market risk premium is 9.90
7 percent to 12.42 percent. Given the Utility Proxy Group and
8 company-specific ranges of common equity cost rates, and the
9 company's high customer growth and level of capital
10 investment plans, my recommended ROE for the company is
11 11.50 percent.

12
13 **Q.** Please summarize the company's proposed capital structure.

14
15 **A.** The company is proposing a capital structure which includes
16 a 54.00 percent common equity ratio. That common equity
17 ratio is consistent with the company's historical equity
18 ratios, and the range of equity ratios maintained by the
19 Utility Proxy Group and their operating subsidiary utility
20 companies.

21
22 **III. GENERAL PRINCIPLES**

23 **Q.** What general principles have you considered in arriving at
24 your recommended common equity cost rate of 11.50 percent?
25

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

14
15 The U.S. Supreme Court affirmed the fair rate of return
16 standards in *Hope* when it stated:

17 The rate-making process under the Act, *i.e.*, the
18 fixing of 'just and reasonable' rates, involves a
19 balancing of the investor and the consumer
20 interests.

21
22 Thus we stated in the *Natural Gas Pipeline Co. Case*
23 that 'regulation does not insure that the business
24 shall produce net revenues.' 315 U.S. at page 590,
25 62 S.Ct. at page 745. But such considerations

1 aside, the investor interest has a legitimate
2 concern with the financial integrity of the company
3 whose rates are being regulated. From the investor
4 or company point of view it is important that there
5 be enough revenue not only for operating expenses
6 but also for the capital costs of the business.
7 These include service on the debt and dividends on
8 the stock. *Cf. Chicago & Grand Trunk R. Co. v.*
9 *Wellman*, 143 U.S. 339, 345, 346 12 S.Ct. 400,402.
10 By that standard the return to the equity owner
11 should be commensurate with returns on investments
12 in other enterprises having corresponding risks.
13 That return, moreover, should be sufficient to
14 assure confidence in the financial integrity of the
15 enterprise, so as to maintain its credit and to
16 attract capital.¹

17
18 In summary, the U.S. Supreme Court has found a return that is
19 adequate to attract capital at reasonable terms enables the
20 utility to provide service while maintaining its financial
21 integrity. As discussed above, and in keeping with
22 established regulatory standards, that return should be
23 commensurate with the returns expected elsewhere for
24 investments of equivalent risk. The Commission's decision in
25 this proceeding, therefore, should provide the company with

1 the opportunity to earn a return that is: (1) adequate to
2 attract capital at reasonable cost and terms; (2) sufficient
3 to ensure its financial integrity; and (3) commensurate with
4 returns on investments in enterprises having corresponding
5 risks.

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

19
20 It therefore is important that the authorized ROE reflects
21 the risks and prospects of the utility's operations and
22 supports the utility's financial integrity from a stand-alone
23 perspective, as measured by its combined business and
24 financial risks. Consequently, the ROE authorized in this
25 proceeding should be sufficient to support the operational

1 (i.e., business risk) and financing (i.e., financial risk) of
2 the company's utility subsidiary on a stand-alone basis.

3
4 **Q.** Within that broad framework, how is the cost of capital
5 estimated in regulatory proceedings?

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

14
15 The cost of capital is the return investors require to make
16 an investment in a company. Investors will provide funds to
17 a firm only if the return that they *expect* is equal to, or
18 greater than, the return that they *require* to accept the risk
19 of providing funds to the firm.

20
21 The cost of capital (i.e., the combination of the costs of
22 debt and equity) is based on the economic principle of
23 "opportunity costs." Investing in any asset (whether debt or
24 equity securities) represents a forgone opportunity to invest
25 in alternative assets. For any investment to be sensible, its

1 expected return must be at least equal to the return expected
2 on alternative, comparable risk investment opportunities.
3 Because investments with like risks should offer similar
4 returns, the opportunity cost of an investment should equal
5 the return available on an investment of comparable risk.

6
7 Whereas the cost of debt is contractually defined and can be
8 directly observed as the interest rate or yield on debt
9 securities, the cost of common equity must be estimated based
10 on market data and various financial models. Because the cost
11 of common equity is premised on opportunity costs, the models
12 used to determine it are typically applied to a group of
13 "comparable" or "proxy" companies.

14
15 In the end, the estimated cost of capital should reflect the
16 return that investors require in light of the subject
17 company's business and financial risks, and the returns
18 available on comparable investments.

19
20 **Q.** Is the authorized return set in regulatory proceedings
21 guaranteed?

22
23 **A.** No, it is not. Consistent with the *Hope* and *Bluefield*
24 standards, the ratemaking process should provide the utility
25 a reasonable opportunity to recover its return of, and return

1 on, its reasonably incurred investments, but it does not
2 guarantee that return. While a utility may have control over
3 some factors that affect the ability to earn its authorized
4 return (e.g., management performance, operating and
5 maintenance expenses, etc.), there are several factors beyond
6 a utility's control that affect its ability to earn its
7 authorized return. Those may include factors such as weather,
8 the economy, and the prevalence and magnitude of regulatory
9 lag.

10
11 **Business Risk**

12 **Q.** Please define business risk and explain why it is important
13 for determining a fair rate of return.

14
15 **A.** The investor-required return on common equity reflects
16 investors' assessment of the total investment risk of the
17 subject firm. Total investment risk is often discussed in
18 the context of business and financial risks.

19
20 Business risk reflects the uncertainty associated with
21 owning a company's common stock without the company's use
22 of debt and/or preferred stock financing. One way of
23 considering the distinction between business and financial
24 risks is to view the former as the uncertainty of the
25 expected earned return on common equity, assuming the firm

1 is financed with no debt.

2
3 Examples of business risks generally faced by utilities
4 include, but are not limited to, the regulatory environment,
5 mandatory environmental compliance requirements, customer
6 mix and concentration of customers, service territory
7 economic growth, market demand, risks and uncertainties of
8 supply, operations, capital intensity, size, the degree of
9 operating leverage, emerging technologies including
10 distributed energy resources, the vagaries of weather, all
11 of which have a direct bearing on earnings. Although
12 analysts, including rating agencies, may categorize business
13 risks individually, as a practical matter, such risks are
14 interrelated and not wholly distinct from one another.
15 Therefore, it is difficult to specifically and numerically
16 quantify the effect of any individual risk on investors'
17 required return, *i.e.*, the cost of capital. For determining
18 an appropriate return on common equity, the relevant issue
19 is where investors see the subject company as falling within
20 a spectrum of risk. To the extent investors view a company
21 as being exposed to higher risk, the required return will
22 increase, and vice versa.

23
24 For regulated utilities, business risks are both long-term
25 and near-term in nature. Whereas near-term business risks

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

14
15 Because utilities invest in long-lived assets, long-term
16 business risks are of paramount concern to equity investors.
17 That is, the risk of not recovering the return on their
18 investment extends far into the future. The timing and
19 nature of events that may lead to losses, however, also are
20 uncertain and, consequently, those risks and their
21 implications for the required return on equity tend to be
22 difficult to quantify. Regulatory commissions (like
23 investors who commit their capital) must review a variety
24 of quantitative and qualitative data and apply their
25 reasoned judgment to determine how long-term risks weigh in

1 their assessment of the market-required return on common
2 equity.

3
4 **Financial Risk**

5 **Q.** Please define financial risk and explain why it is important
6 in determining a fair rate of return.

7
8 **A.** Financial risk is the additional risk created by the
9 introduction of debt and preferred stock into the capital
10 structure. The higher the proportion of debt and preferred
11 stock in the capital structure, the higher the financial
12 risk to common equity owners (*i.e.*, failure to receive
13 dividends due to default or other covenants). Therefore,
14 consistent with the basic financial principle of risk and
15 return, common equity investors require higher returns as
16 compensation for bearing higher financial risk.

17
18 **Q.** Can bond and credit ratings be a proxy for a firm's combined
19 business and financial risks to equity owners (*i.e.*,
20 investment risk)?

21
22 **A.** Yes, similar bond ratings/issuer credit ratings reflect, and
23 are representative of, similar combined business and
24 financial risks (*i.e.*, total risk) faced by bond investors.²
25 Although specific business or financial risks may differ

1 between companies, the same bond/credit rating indicates
2 that the combined risks are roughly similar from a
3 debtholder perspective. The caveat is that these debtholder
4 risk measures do not translate directly to risks for common
5 equity.

6
7 **IV. TAMPA ELECTRIC AND THE UTILITY PROXY GROUP**

8 **Q.** Are you familiar with Tampa Electric's operations?

9
10 **A.** Yes. The company's electric division provides generation,
11 transmission, and distribution electric service to
12 approximately 839,960 retail customers in Florida.³ Tampa
13 Electric has long-term issuer ratings of A3 from Moody's and
14 BBB+ from S&P.⁴ The company is not publicly traded as it
15 comprises an operating subsidiary of TECO Energy, Inc.,
16 whose ultimate parent is Emera Incorporated ("Emera" or the
17 "Parent"). Emera has electric generation, transmission, and
18 distribution operations, natural gas transmission and
19 distribution operations, and non-regulated energy marketing
20 operations in Canada, the United States, and the Caribbean.⁵

21
22 Page 1 of Document No. 3 contains comparative capitalization
23 and financial statistics for Tampa Electric for the years
24 2018 to 2022.⁶

1 Q. Please explain how you chose the companies in the Utility
2 Proxy Group.

3

4 A. The companies selected for the Utility Proxy Group met the
5 following criteria:

6 • They were included in the Eastern, Central, or Western
7 Electric Utility Group of *Value Line* (Standard Edition);

8 • They have 70.00 percent or greater of fiscal year 2022
9 total operating income derived from, and 70.00 percent or
10 greater of fiscal year 2022 total assets attributable to,
11 regulated electric operations;

12 • They are vertically integrated (*i.e.*, utilities that own
13 and operate regulated generation, transmission, and
14 distribution assets);

15 • At the time of preparation of this direct testimony, they
16 had not publicly announced that they were involved in any
17 major merger or acquisition activity (*i.e.*, one publicly
18 traded utility merging with or acquiring another) or any
19 other major development;

20 • They have not cut or omitted their common dividends during
21 the five years ending 2022 or through the time of
22 preparation of this direct testimony;

23 • They have *Value Line* and Bloomberg Professional Services
24 (“Bloomberg”) adjusted betas;

25 • They have positive *Value Line* five-year dividends per

- 1 share ("DPS") growth rate projections; and
- 2 • They have *Value Line*, *Zacks*, or *Yahoo! Finance* consensus
- 3 five-year earnings per share ("EPS") growth rate
- 4 projections.

5

6 The following 14 companies met these criteria: Alliant

7 Energy Corporation (LNT); Ameren Corporation (AEE); American

8 Electric Power Corporation (AEP); Duke Energy Corporation

9 (DUK); Edison International (EIX); Entergy Corporation

10 (ETR); Evergy, Inc. (EVRG); IDACORP, Inc. (IDA);

11 NorthWestern Corporation (NWE); OGE Energy Corporation

12 (OGE); Pinnacle West Capital Corporation (PNW); Portland

13 General Electric Company (POR); Southern Company (SO); and

14 Xcel Energy, Inc. (XEL).

15

16 **Q.** Please describe Document No. 3, page 2.

17

18 **A.** Page 2 of Document No. 3 contains comparative capitalization

19 and financial statistics for the Utility Proxy Group for the

20 years 2018 to 2022.

21

22 **V. CAPITAL STRUCTURE**

23 **Q.** What is Tampa Electric's requested capital structure?

24

25 **A.** Tampa Electric's requested capital structure consists of

1 41.57 percent long-term debt and 54.00 percent common
2 equity, as shown in my Document No. 1 that is based on data
3 included in the company's MFR Schedule D-1a.
4

5 **Q.** Does Tampa Electric have a separate capital structure that
6 is recognized by investors?
7

8 **A.** Yes. Tampa Electric is a separate corporate entity that has
9 its own capital structure and issues its own debt. Tampa
10 Electric's actual capital structure is reflected in
11 registrations of its debt issuances with the United States
12 Securities and Exchange Commission.
13

14 **Q.** What are the typical sources of capital commonly considered
15 in establishing a utility's capital structure?
16

17 **A.** Common equity and long-term debt are commonly considered in
18 establishing a utility's capital structure because they are
19 the typical sources of capital financing for a utility's
20 rate base.
21

22 **Q.** Please explain.
23

24 **A.** Long-lived assets are typically financed with long-lived
25 securities, so that the overall term structure of the

1 utility's long-term liabilities (both debt and equity)
2 closely match the life of the assets being financed. As
3 stated by Brigham and Houston:

4 In practice, firms don't finance each specific asset
5 with a type of capital that has a maturity equal to the
6 asset's life. However, academic studies do show that
7 most firms tend to finance short-term assets from
8 short-term sources and long-term assets from long-term
9 sources.⁷

10
11 Whereas short-term debt has a maturity of one year or less,
12 long-term debt may have maturities of 30 years or longer.
13 Although there are practical financing constraints, such as
14 the need to "stagger" long-term debt maturities, the general
15 objective is to extend the average life of long-term debt.
16 Still, long-term debt has a finite life, which is likely to
17 be less than the life of the assets included in rate base.
18 Common equity, on the other hand, is outstanding into
19 perpetuity. Thus, common equity more accurately matches the
20 life of the going concern of the utility, which is also
21 assumed to operate in perpetuity. Consequently, it is both
22 typical and important for utilities to have significant
23 proportions of common equity in their capital structures.

24
25 Q. Why is it important that the company's requested capital

1 structure, consisting of 41.57 percent long-term debt and
2 54.00 percent common equity, be authorized in this
3 proceeding?

4
5 **A.** In order to provide safe, reliable, and affordable service
6 to its customers, Tampa Electric must meet the needs and
7 serve the interests of its various stakeholders, including
8 its customers, shareholders, and bondholders. The interests
9 of these stakeholder groups are aligned with maintaining a
10 healthy balance sheet, strong credit ratings, and a
11 supportive regulatory environment, so that the company has
12 access to capital on reasonable terms in order to make
13 necessary investments.

14
15 Safe and reliable service cannot be maintained at a
16 reasonable cost if utilities do not have the financial
17 flexibility and strength to access competitive financing
18 markets on reasonable terms. As Mr. Chronister explains, an
19 appropriate capital structure is important not only to
20 ensure long-term financial integrity, it also is critical
21 to enabling access to capital during constrained markets,
22 or when near-term liquidity is needed to fund extraordinary
23 requirements. In that respect, the capital structure, and
24 the financial strength it engenders, must support both
25 normal circumstances and periods of market uncertainty. The

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

10
11 **Q.** How does the company's requested common equity ratio of
12 54.00 percent compare with the common equity ratios
13 maintained by the Utility Proxy Group?

14
15 **A.** The company's requested ratemaking common equity ratio of
16 54.00 percent is reasonable and consistent with the range
17 of common equity ratios maintained by the Utility Proxy
18 Group. As shown on pages 3 and 4 of Document No. 3, common
19 equity ratios of the Utility Proxy Group companies range
20 from 28.90 percent to 56.13 percent for fiscal year 2022.

21
22 In addition to comparing the company's actual common equity
23 ratio with current common equity ratios maintained by the
24 Utility Proxy Group companies, I also compared the company's
25 actual common equity ratio with the equity ratios maintained

1 by the utility operating subsidiaries of the Utility Proxy
2 Group companies. As shown on page 5 of Document No. 3, common
3 equity ratios of the utility operating subsidiaries of the
4 Utility Proxy Group range from 38.14 percent to 55.90
5 percent for fiscal year 2022.

6
7 **Q.** Is Tampa Electric's equity ratio of 54.00 percent
8 appropriate for ratemaking purposes given these measures
9 cited above?

10
11 **A.** Yes, it is. The company's equity ratio of 54.00 percent is
12 appropriate for ratemaking purposes in the current
13 proceeding because it is within the range of the common
14 equity ratios currently maintained, and expected to be
15 maintained, by the Utility Proxy Group and their utility
16 operating subsidiaries.

17
18 **VI. COMMON EQUITY COST RATE MODELS**

19 **Q.** Is it important that cost of common equity models be market-
20 based?

21
22 **A.** Yes. While a public utility operates a regulated business
23 within the states in which it operates, it still must compete
24 for equity in capital markets along with all other companies
25 of comparable risk, which includes non-utilities. The cost of

1 common equity is thus determined based on equity market
2 expectations for the returns of those companies. If an
3 individual investor is choosing to invest their capital among
4 companies of comparable risk, they will choose a company
5 providing a higher return over a company providing a lower
6 return.

7
8 **Q.** Are your cost of common equity models market-based?

9
10 **A.** Yes. The DCF model uses market prices in developing the
11 model's dividend yield component. The RPM uses bond ratings
12 and expected bond yields that reflect the market's assessment
13 of bond/credit risk. In addition, betas (β), which reflect
14 the market/systematic risk component of equity risk premium,
15 are derived from regression analyses of market prices. The
16 CAPM is market-based for many of the same reasons that the
17 RPM is market-based (*i.e.*, the use of expected bond yields
18 and betas). Selection criteria for comparable risk, non-price
19 regulated companies are based on regression analyses of
20 market prices and reflect the market's assessment of total
21 risk.

22
23 **Q.** What analytical approaches did you use to determine the
24 company's ROE?

25

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

5
6 I rely on these models because reasonable investors use a
7 variety of tools and do not rely exclusively on a single
8 source of information or single model. Moreover, the models
9 on which I rely focus on different aspects of return
10 requirements and provide different insights to investors'
11 views of risk and return. The DCF model, for example,
12 estimates the investor-required return assuming a constant
13 expected dividend yield and growth rate in perpetuity, while
14 Risk Premium-based methods (*i.e.*, the RPM and CAPM
15 approaches) provide the ability to reflect investors' views
16 of risk, future market returns, and the relationship between
17 interest rates and the cost of common equity. Just as the use
18 of market data for the Utility Proxy Group adds the
19 reliability necessary to inform expert judgment in arriving
20 at a recommended common equity cost rate, the use of multiple
21 generally accepted common equity cost rate models also adds
22 reliability and accuracy when arriving at a recommended
23 common equity cost rate.

24
25 **Q.** Has the Commission approved the use of multiple methods in

1 determining the cost of equity during past rate cases?

2
3 **A.** Yes. In Docket No. 20080318-GU, the Commission stated that
4 there are several models which satisfy the terms for
5 determining a fair rate of return as laid out by *Hope* and
6 *Bluefield*:

7 While the logic of the legal and economic concepts
8 of a fair rate of return are fairly straight
9 forward, the actual implementation of these
10 concepts is more controversial. Unlike the cost
11 rate on debt that is fixed and known due to its
12 contractual terms, the cost of equity must be
13 estimated. **Financial models have been developed to**
14 **estimate the investor-required ROE for a company.**
15 Market-based approaches such as the Discounted Cash
16 Flow (DCF) model and the Capital Asset Pricing
17 Model (CAPM) are generally recognized as being
18 consistent with the market-based standards of a
19 fair return enunciated in Hope, 320 U.S. 591 and
20 Bluefield, 262 U.S. 679. [Emphasis added]⁸

21
22 More recently, in Order No. PSC-2023-0388-FOF-GU, issued on
23 December 27, 2023, the Commission considered the results of
24 the witnesses DCF, CAPM, and RPM analyses to determine the
25 appropriate range of ROEs in which to set Peoples Gas System,

1 Inc.'s authorized return.⁹

2
3 **Discounted Cash Flow Model**

4 **Q.** What is the theoretical basis of the DCF model?

5
6 **A.** The theory underlying the DCF model is that the present value
7 of an expected future stream of net cash flows during the
8 investment holding period can be determined by discounting
9 those cash flows at the cost of capital, or the investors'
10 capitalization rate. DCF theory indicates that an investor
11 buys a stock for an expected total return rate, which is
12 derived from the cash flows received from dividends and market
13 price appreciation. Mathematically, the dividend yield on
14 market price plus a growth rate equals the capitalization
15 rate (*i.e.*, the total common equity return rate expected by
16 investors), as depicted in the formula below:

17
$$K_e = (D_0 (1+g))/P + g$$

18 Where:

19 K_e = the required return on common equity;

20 D_0 = the annualized dividend per share;

21 P = the current stock price; and

22 g = the growth rate.

23
24 **Q.** Which version of the DCF model did you rely on?

25

1 **A.** I used the single-stage constant growth DCF model in my
2 analyses.

3

4 **Q.** Please describe the dividend yield you used in applying the
5 constant growth DCF model.

6

7 **A.** The unadjusted dividend yields are based on the Utility
8 Proxy Group companies' dividends as of December 29, 2023,
9 divided by the average closing market price for the 60
10 trading days ended December 29, 2023 (see, Column 1, page 1
11 of Document No. 4).

12

13 **Q.** Please explain your adjustment to the dividend yield.

14

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

19

20 DCF theory calls for using the full growth rate, or D_1 , in
21 calculating the model's dividend yield component. Since the
22 companies in the Utility Proxy Group increase their
23 quarterly dividends at various times during the year, a
24 reasonable assumption is to reflect one-half of the annual
25 dividend growth rate in the dividend yield component, or

1 D_{1/2}. Because the dividend should be representative of the
2 next 12-month period, this adjustment is a conservative
3 approach that does not overstate the dividend yield.
4 Therefore, the actual average dividend yields in Column 1,
5 page 1 of Document No. 4 were adjusted upward to reflect
6 one-half of the average projected growth rate shown in
7 Column 6.

8
9 **Q.** Please explain the basis for the growth rates you apply to
10 the Utility Proxy Group in your constant growth DCF model.

11
12 **A.** Investors are likely to rely on widely available financial
13 information services, such as *Value Line*, Zacks, and Yahoo!
14 Finance. Investors realize that analysts have significant
15 insight into the dynamics of the industries and individual
16 companies they analyze, as well as companies' abilities to
17 effectively manage the effects of changing laws and
18 regulations, and ever-changing economic and market
19 conditions. For these reasons, I used analysts' five-year
20 forecasts of earnings per share growth in my DCF analysis.

21
22 Over the long run, there can be no growth in dividends per
23 share without growth in earnings per share. Security
24 analysts' earnings expectations have a more significant
25 influence on market prices than dividend expectations. Thus,

1 using projected earnings growth rates in a DCF analysis
2 provides a better match between investors' market price
3 appreciation expectations and the growth rate component of
4 the DCF.

5
6 **Q.** Please summarize the constant growth DCF model results.

7
8 **A.** As shown on page 1 of Document No. 4, the application of the
9 constant growth DCF model to the Utility Proxy Group results
10 in a range of indicated ROEs from 7.42 percent to 10.72
11 percent. The mean of those results is 9.89 percent, the median
12 result is 9.89 percent, and the average of the two is 9.89
13 percent.

14
15 In arriving at a conclusion for the constant growth DCF-
16 indicated common equity cost rate for the Utility Proxy Group,
17 I relied on an average of the mean and the median results of
18 the DCF, specifically 9.89 percent, applicable to the Utility
19 Proxy Group. This approach takes into consideration all proxy
20 company results while mitigating high and low side outliers
21 of those results.

22
23 ***The Risk Premium Model***

24 **Q.** Please describe the theoretical basis of the RPM.
25

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

10
11 While it is possible to directly observe bond returns and
12 yields, the investors' required common equity returns cannot
13 be directly determined or observed. According to RPM theory,
14 one can estimate a common equity risk premium over bonds
15 (either historically or prospectively) and use that premium
16 to derive a cost rate of common equity. The cost of common
17 equity equals the expected cost rate for long-term debt
18 capital, plus a risk premium over that cost rate, to
19 compensate common shareholders for the added risk of being
20 unsecured and last-in-line for any claim on the
21 corporation's assets and earnings upon liquidation.

22
23 **Q.** Please explain the total market approach RPM.

24
25 **A.** The total market approach RPM adds a prospective public

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

6
7 **Q.** Please explain how you determined the expected bond yield
8 applicable to the Utility Proxy Group.

9
10 **A.** The first step in the total market approach RPM analysis is
11 to determine the expected bond yield. Because both
12 ratemaking and the cost of capital, including the common
13 equity cost rate, are prospective in nature, a prospective
14 yield on similarly-rated long-term debt is essential. I
15 relied on a consensus forecast of about 50 economists of the
16 expected yield on Aaa-rated corporate bonds for the six
17 calendar quarters ending with the second calendar quarter
18 of 2025, and *Blue Chip's* long-term projections for 2025 to
19 2029, and 2030 to 2034. As shown on line 1, page 1 of
20 Document No. 5, the average expected yield on Moody's Aaa-
21 rated corporate bonds is 4.90 percent.

22
23 Because that 4.90 percent estimate represents a corporate
24 bond yield and not a utility specific bond yield, I adjusted
25 the expected Aaa-rated corporate bond yield to an equivalent

1 A2-rated public utility bond yield, I made an upward
2 adjustment of 0.73 percent, which represents a recent spread
3 between Aaa-rated corporate bonds and A2-rated public
4 utility bonds (as shown on line 2 and explained in note 2
5 on page 1 of Document No. 5). Adding that recent 0.73 percent
6 spread to the expected Aaa-rated corporate bond yield of
7 4.90 percent results in an expected A2-rated public utility
8 bond yield of 5.63 percent.

9
10 I then reviewed the average credit rating for the Utility
11 Proxy Group from Moody's to determine if an adjustment to
12 the estimated A2-rated public utility bond was necessary.
13 Since the Utility Proxy Group's average Moody's long-term
14 issuer rating is Baa1, another adjustment to the expected
15 A2-rated public utility bond is needed to reflect this
16 difference in bond ratings. An upward adjustment of 0.17
17 percent, which represents two-thirds of a recent spread
18 between A2-rated and Baa2-rated public utility bond yields,
19 is necessary to make the A2 prospective bond yield
20 applicable to an Baa1-rated public utility bond (as shown
21 on line 4 and explained in note 3 on page 1 of Document No.
22 5). Adding the 0.17 percent to the 5.63 percent prospective
23 A2-rated public utility bond yield results in a 5.80 percent
24 expected bond yield applicable to the Utility Proxy Group
25 as shown on page 1 of Document No. 5.

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

5
6 **Q.** Please explain how the beta-derived equity risk premium is
7 determined.

8
9 **A.** The components of the beta-derived risk premium model are:
10 (1) an expected market equity risk premium over corporate
11 bonds, and (2) the beta. The derivation of the beta-derived
12 equity risk premium that I applied to the Utility Proxy
13 Group is shown on lines 1 through 9, on page 6 of Document
14 No. 5. The total beta-derived equity risk premium I applied
15 is based on an average of three historical market data-based
16 equity risk premiums, two *Value Line*-based equity risk
17 premiums, and a Bloomberg-based equity risk premium. Each
18 of these is described below.

19
20 **Q.** How did you derive a market equity risk premium based on
21 long-term historical data?

22
23 **A.** To derive an historical market equity risk premium, I used
24 the most recent holding period returns for the large company
25 common stocks from the Stocks, Bonds, Bills, and Inflation

1 ("SBBI") Yearbook 2023 ("SBBI - 2023")¹⁰ less the average
2 historical yield on Moody's Aaa/Aa-rated corporate bonds for
3 the period 1928 to 2022. Using holding period returns over
4 a long period of time is appropriate because it is consistent
5 with the long-term investment horizon presumed by investing
6 in a going concern, *i.e.*, a company expected to operate in
7 perpetuity.

8
9 SBBI's long-term arithmetic mean monthly total return rate
10 on large company common stocks was 11.78 percent and the
11 long-term arithmetic mean monthly yield on Moody's Aaa/Aa-
12 rated corporate bonds was 5.96 percent (as explained in note
13 1, page 6 of Document No. 5). As shown on line 1, page 6 of
14 Document No. 5, subtracting the mean monthly bond yield from
15 the total return on large company stocks results in a long-
16 term historical equity risk premium of 5.82 percent.

17
18 I used the arithmetic mean monthly total return rates for
19 the large company stocks and yields (income returns) for the
20 Moody's Aaa/Aa corporate bonds, because they are appropriate
21 for the purpose of estimating the cost of capital as noted
22 in SBBI - 2023.¹¹ Using the arithmetic mean return rates
23 and yields is appropriate because historical total returns
24 and equity risk premiums provide insight into the variance
25 and standard deviation of returns needed by investors in

1 estimating future risk when making a current investment. If
2 investors relied on the geometric mean of historical equity
3 risk premiums, they would have no insight into the potential
4 variance of future returns, because the geometric mean
5 relates the change over many periods to a constant rate of
6 change, thereby obviating the year-to-year fluctuations, or
7 variance, which is critical to risk analysis.

8
9 **Q.** Please explain the derivation of the regression-based market
10 equity risk premium.

11
12 **A.** To derive the regression-based market equity risk premium
13 of 7.27 percent shown on line 2, page 6 of Document No. 5,
14 I used the same monthly annualized total returns on large
15 company common stocks relative to the monthly annualized
16 yields on Moody's Aaa/Aa-rated corporate bonds as mentioned
17 above. I modeled the relationship between interest rates and
18 the market equity risk premium using the observed monthly
19 market equity risk premium as the dependent variable, and
20 the monthly yield on Moody's Aaa/Aa-rated corporate bonds
21 as the independent variable. I then used a linear Ordinary
22 Least Squares ("OLS") regression, in which the market equity
23 risk premium is expressed as a function of the Moody's
24 Aaa/Aa-rated corporate bonds yield:

1
$$RP = \alpha + \beta (R_{Aaa/Aa})$$

2
3 **Q.** Please explain the derivation of the PRPM equity risk
4 premium.

5
6 **A.** The PRPM, published in the *Journal of Regulatory Economics*,¹²
7 was developed from the work of Robert F. Engle, who shared
8 the Nobel Prize in Economics in 2003 "for methods of analyzing
9 economic time series with time-varying volatility ("ARCH)".¹³
10 Engle found that volatility changes over time and is related
11 from one period to the next, especially in financial markets.
12 Engle discovered that volatility of prices and returns
13 clusters over time and is therefore highly predictable and
14 can be used to predict future levels of risk and risk
15 premiums.

16
17 The PRPM estimates the risk-return relationship directly, as
18 the predicted equity risk premium is generated by predicting
19 volatility or risk. The PRPM is not based on an estimate of
20 investor behavior, but rather on an evaluation of the results
21 of that behavior (*i.e.*, the variance of historical equity
22 risk premiums).

23
24 The inputs to the model are the historical monthly returns on
25 large company common stocks minus the monthly yields on

1 Moody's Aaa/Aa-rated corporate bonds during the period from
2 January 1928 through December 2023.¹⁴ Using a generalized
3 form of ARCH, known as GARCH, I calculated each Utility Proxy
4 Group company's projected equity risk premium using Eviews®
5 statistical software. When the GARCH model is applied to the
6 historical return data, it produces a predicted GARCH
7 variance series and a GARCH coefficient. Multiplying the
8 predicted monthly variance by the GARCH coefficient and then
9 annualizing it¹⁵ produces the predicted annual equity risk
10 premium. The resulting PRPM predicted a market equity risk
11 premium of 9.35 percent.¹⁶

12
13 **Q.** Is the PRPM supported by academic literature?

14
15 **A.** Yes, it is. The PRPM is based on the research of Dr. Robert
16 F. Engle, dating back to the early 1980s. Dr. Engle discovered
17 that the volatility of market prices, returns, and risk
18 premiums clusters over time, making prices, returns, and risk
19 premiums highly predictable.

20
21 In 2003, he shared the Nobel Prize in Economics for this work,
22 characterized as "methods of analyzing economic time series
23 with time-varying volatility ("ARCH").¹⁷ Dr. Engle¹⁸ noted
24 that relative to volatility, "the standard tools have become
25 the ARCH/GARCH¹⁹ models." Hence, the methodology is not new.

1 In addition, the GARCH methodology has been well tested by
2 academia since Engle's, *et al.* research was originally
3 published in 1982, 40 years ago. I use the well-established
4 GARCH methodology to estimate the PRPM model using a standard
5 commercial and relatively inexpensive statistical package,
6 Eviews,^{©20} to develop a means by which to estimate a predicted
7 equity risk premium which, when added to a bond yield, results
8 in a cost of common equity.

9
10 Also, the PRPM is in the public domain, having been published
11 six times in academically peer-reviewed journals: *Journal of*
12 *Economics and Business* (June 2011 and April 2015),²¹ *The*
13 *Journal of Regulatory Economics* (December 2011),²² *The*
14 *Electricity Journal* (May 2013 and March 2020),²³ and *Energy*
15 *Policy* (April 2019).²⁴ Notably, none of these articles have
16 been rebutted in the academic literature.

17
18 Finally, the PRPM has also been presented to a number of
19 utility industry/regulatory/academic groups including the
20 following: The Edison Electric Institute Cost of Capital
21 Working Group; The NARUC Staff Subcommittee on Accounting
22 and Finance; The National Association of Electric Companies
23 Finance/Accounting/Taxation and Rates and Regulations
24 Committees; the NARUC Electric Committee; The Wall Street
25 Utility Group; the Indiana Utility Regulatory Commission

1 Cost of Capital Task Force; the Financial Research Institute
2 of the University of Missouri Hot Topic Hotline Webinar; and
3 the Center for Research and Regulated Industries Annual
4 Eastern Conference on two occasions.

5
6 **Q.** Has the PRPM been implicitly accepted by other regulatory
7 commissions?

8
9 **A.** Yes. In Docket No. 2017-292-WS, the Public Service Commission
10 of South Carolina ("PSC SC") accepted Blue Granite Water
11 Company's entire requested ROE, which included the PRPM. The
12 relevant portion states:

13 The Commission finds Mr. D'Ascendis' arguments
14 persuasive. He provided more indicia of market
15 returns, by using more analytical methods and proxy
16 group calculations. Mr. D'Ascendis' use of
17 analysts' estimates for his DCF analysis is
18 supported by consensus, as is his use of the
19 arithmetic mean. The Commission also finds that Mr.
20 D'Ascendis' non-price regulated proxy group more
21 accurately reflects the total risk faced [by] price
22 regulated utilities and CWS. Furthermore, there is
23 no dispute that CWS is significantly smaller than
24 its proxy group counterparts, and, therefore, it
25 may present a higher risk. An appropriate ROE for

1 CWS is 10.45% to 10.95%. The company used an ROE of
2 10.5% in computing its Application, a return on the
3 low end of Mr. D'Ascendis' range, and the
4 Commission finds that ROE is supported by the
5 evidence.²⁵

6
7 In addition, in Docket No. W-354, Subs 363, 364 and 365, the
8 State of North Carolina Utilities Commission ("NCUC")
9 approved my RPM and CAPM analyses, which used PRPM analyses
10 as presented in this proceeding. The relevant portion of the
11 order states:

12 In doing so the Commission finds that the DCF
13 (8.81%), Risk Premium (10.00%) and CAPM (9.29%)
14 model results provided by witness D'Ascendis, as
15 updated to use current rates in D'Ascendis Late-
16 Filed Exhibit No. 1, as well as the risk premium
17 (9.57%) analysis of witness Hinton, are credible,
18 probative, and are entitled to substantial weight
19 as set forth below.²⁶

20
21 **Q.** Did the commission reject the PRPM in Order No. PSC-2023-
22 0388-FOF-GU concerning Peoples Gas Systems?

23
24 **A.** Yes, it did. The Commission stated the:

25 PRPM suffers from a lack of transparency, is used

1 only by a few ROE witnesses testifying on behalf of
2 utilities, has not been widely relied upon by other
3 regulatory jurisdictions, and routinely produces
4 ROE results that are higher than both the DCF Model
5 and CAPM which are widely accepted and relied upon
6 by the regulatory community. We find that there is
7 persuasive evidence in the record that the PRPM
8 method developed and used by witness D'Ascendis in
9 all his cost of equity analyses produces an
10 unreasonably excessive ROE and shall be
11 disregarded.

12
13 **Q.** Do you have a response to the commission's statement?
14

15 **A.** Yes, I do. I appreciate the commission's openness to
16 considering multiple models in its determination of ROEs for
17 the utilities they regulate, but I respectfully disagree with
18 their exclusion of the PRPM in Order No. PSC-2023-0388-FOF-
19 GU. As noted above, the theory supporting the model is based
20 on the Nobel Prize winning work of Engle, and the model itself
21 has been published six times in four separate peer-reviewed
22 academic journals, which indicates that it has been
23 thoroughly vetted by the academic community. This, in
24 addition to the fact that the model has not been rebutted in
25 the academic literature in the over ten years since it has

1 been presented should speak to the model's soundness. While
2 maybe not universally accepted, the PRPM is widely
3 disseminated across the U.S. regulatory landscape.

4
5 In view of the above, the soundness of the model, as evidenced
6 in the underlying theory and the academic vetting of the PRPM,
7 and the wide dissemination of the model in the U.S. regulatory
8 landscape should lead the commission reconsider the PRPM in
9 its determination regarding the ROE for Tampa Electric in
10 this proceeding.

11
12 **Q.** Have you applied the PRPM in the same manner in this
13 proceeding as you did in Docket No. 20230023-GU?

14
15 **A.** In part. In my Direct Testimony in this proceeding, I have
16 not relied on the PRPM results of the individual companies in
17 the Utility Proxy Group. However, I continue to rely on the
18 PRPM in my estimation of the equity risk premium used in my
19 RPM and CAPM analyses.

20
21 **Q.** Additionally, have you presented your ROE model results
22 excluding the PRPM?

23
24 **A.** Yes. While I respectfully disagree with the Commission's
25 finding in Order No. PSC-2023-0388-FOF-GU, I have presented

1 my ROE model results including and excluding the PRPM for the
2 commission's convenience. As can be gleaned from Document No.
3 2, my recommended ROE of 11.50 percent is still within the
4 range of ROEs produced by my models without the PRPM.
5

6 **Q.** Please explain the derivation of a projected equity risk
7 premium based on *Value Line* data for your RPM analysis.
8

9 **A.** As noted above, because both ratemaking and the cost of
10 capital are prospective, a prospective market equity risk
11 premium is needed. The derivation of the forecasted or
12 prospective market equity risk premium can be found in note
13 4, page 7 of Document No. 5. Consistent with my calculation
14 of the dividend yield component in my DCF analysis, this
15 prospective market equity risk premium is derived from an
16 average of the three- to five-year median market price
17 appreciation potential by *Value Line* for the 13 weeks ended
18 December 29, 2023, plus an average of the median estimated
19 dividend yield for the common stocks of the 1,700 firms
20 covered in *Value Line* (as explained in note 1, page 2 of
21 Document No. 5).
22

23 The average median expected price appreciation is 62.00
24 percent, which translates to a 12.82 percent annual
25 appreciation, and when added to the average of *Value Line's*

1 median expected dividend yields of 2.33 percent, equates to
2 a forecasted annual total return rate on the market of 15.15
3 percent. The forecasted Moody's Aaa-rated corporate bond
4 yield of 4.90 percent is deducted from the total market
5 return of 15.15 percent, resulting in an equity risk premium
6 of 10.25 percent, as shown on line 4, page 6 of Document No.
7 5.

8
9 **Q.** Please explain the derivation of an equity risk premium
10 based on the S&P 500 companies.

11
12 **A.** Using data from *Value Line*, I calculated an expected total
13 return on the S&P 500 companies using expected dividend
14 yields and long-term growth estimates as a proxy for capital
15 appreciation. The expected total return for the S&P 500 is
16 14.14 percent. Subtracting the prospective yield on Moody's
17 Aaa-rated corporate bonds of 4.90 percent results in a 9.24
18 percent projected equity risk premium as shown on line 5,
19 page 6 of Document No. 5.

20
21 **Q.** Please explain the derivation of an equity risk premium
22 based on Bloomberg data.

23
24 **A.** Using data from Bloomberg, I calculated an expected total
25 return on the S&P 500 using expected dividend yields and

1 long-term growth estimates as a proxy for capital
2 appreciation, identical to the method described above. The
3 expected total return for the S&P 500 is 17.52 percent.
4 Subtracting the prospective yield on Moody's Aaa-rated
5 corporate bonds of 4.90 percent results in a 12.62 percent
6 projected equity risk premium as shown on line 6, page 6 of
7 Document No. 5.

8
9 **Q.** What is your conclusion of a beta-derived equity risk
10 premium for use in your RPM analysis?

11
12 **A.** I gave equal weight to all six equity risk premiums based
13 on each source - historical, *Value Line*, and Bloomberg - in
14 arriving at a 9.54 percent equity risk premium as shown on
15 line 7, page 6 of Document No. 5.

16
17 After calculating the average market equity risk premium of
18 9.09 percent, I adjusted it by the beta to account for the
19 risk of the Utility Proxy Group. As discussed below, the
20 beta is a meaningful measure of prospective relative risk
21 to the market as a whole, and is a logical way to allocate
22 a company's, or proxy group's, share of the market's total
23 equity risk premium relative to corporate bond yields. As
24 shown on page 1 of Document No. 6, the average of the mean
25 and median beta for the Utility Proxy Group is 0.81.

1 Multiplying the 0.81 average beta by the market equity risk
2 premium of 9.09 percent results in a Beta-adjusted equity
3 risk premium for the Utility Proxy Group of 7.36 percent
4 (see line 9, page 6 of Document No. 5).

5
6 **Q.** How did you derive the equity risk premium based on the S&P
7 Utility Index and Moody's A-rated public utility bonds?
8

9 **A.** I estimated three equity risk premiums based on the S&P
10 Utility Index holding period returns, and two equity risk
11 premiums based on the expected returns of the S&P Utilities
12 Index, using *Value Line* and Bloomberg data, respectively.
13 Turning first to the S&P Utility Index holding period
14 returns, I derived a long-term monthly arithmetic mean
15 equity risk premium between the S&P Utility Index total
16 returns of 10.63 percent and monthly Moody's A-rated public
17 utility bond yields of 6.44 percent from 1928 to 2019 to
18 arrive at an equity risk premium of 4.20 percent (as shown
19 on line 1, page 10 of Document No. 5). I then used the same
20 historical data to derive an equity risk premium of 5.01
21 percent based on a regression of the monthly equity risk
22 premiums (as shown on line 2, page 10 of Document No. 5).
23 The final S&P Utility Index holding period equity risk
24 premium involved applying the PRPM using the historical
25 monthly equity risk premiums from January 1928 to December

1 2023 to arrive at a PRPM-derived equity risk premium of 4.80
2 percent for the S&P Utility Index (as shown on line 3, page
3 10 of Document No. 5).

4
5 I then derived expected total returns on the S&P Utilities
6 Index of 10.63 percent and 10.61 percent using data from
7 *Value Line* and Bloomberg, respectively, and subtracted the
8 prospective Moody's A2-rated public utility bond yield of
9 5.63 percent (derived on line 3, page 1 of Document No. 5),
10 which resulted in equity risk premiums of 5.00 percent and
11 4.98 percent, respectively (as shown on lines 4 and 5,
12 respectively, on page 10 of Document No. 5). As with the
13 market equity risk premiums, I averaged each risk premium
14 based on each source (*i.e.*, historical, *Value Line*, and
15 Bloomberg) to arrive at my utility-specific equity risk
16 premium of 4.80 percent as shown on line 6, page 10 of
17 Document No. 5.

18
19 **Q.** How do you derive an equity risk premium of 4.85 percent
20 based on authorized ROEs for electric utilities?

21
22 **A.** The equity risk premium of 4.85 percent shown on line 3,
23 page 5 of Document No. 5 is the result of a regression
24 analysis based on regulatory awarded ROEs related to the
25 yields on Moody's A2-rated public utility bonds. That

1 analysis is shown on page 11 of Document No. 5. Page 11 of
2 Document No. 5 contains the graphical results of a
3 regression analysis of 1,232 rate cases for electric
4 utilities which were fully litigated during the period from
5 January 1, 1980, through December 29, 2023. It shows the
6 implicit equity risk premium relative to the yields on A2-
7 rated public utility bonds immediately prior to the issuance
8 of each regulatory decision.

9
10 It is readily discernible that there is an inverse
11 relationship between the yield on A2-rated public utility
12 bonds and equity risk premiums. In other words, as interest
13 rates decline, the equity risk premium rises and vice versa,
14 a result consistent with financial literature on the
15 subject.²⁷ I used the regression results to estimate the
16 equity risk premium applicable to the projected yield on
17 Moody's A2-rated public utility bonds. Given the expected
18 A2-rated utility bond yield of 5.63 percent, it can be
19 calculated that the indicated equity risk premium applicable
20 to that bond yield is 4.85 percent, which is shown on line
21 3, page 5 of Document No. 5.

22
23 **Q.** What is your conclusion of an equity risk premium for use
24 in your total market approach RPM analysis?
25

1 **A.** The equity risk premium I apply to the Utility Proxy Group
2 is 5.67 percent, which is the average of the beta-adjusted
3 equity risk premium for the Utility Proxy Group, the S&P
4 Utilities Index, and the authorized return utility equity
5 risk premiums of 7.36 percent, 4.80 percent, and 4.85
6 percent, respectively, as shown on page 5 of Document No.
7 5.

8
9 **Q.** What is the indicated RPM common equity cost rate based on
10 the total market approach?

11
12 **A.** As shown on line 7, page 1 of Document No. 5, I calculated
13 a common equity cost rate of 11.47 percent for the Utility
14 Proxy Group based on the total market approach RPM.

15
16 ***The Capital Asset Pricing Model***

17 **Q.** Please explain the theoretical basis of the CAPM.

18
19 **A.** CAPM theory defines risk as the co-variability of a
20 security's returns with the market's returns as measured by
21 the beta (β). A beta less than 1.0 indicates lower
22 variability than the market as a whole, while a beta greater
23 than 1.0 indicates greater variability than the market.

24
25 The CAPM assumes that all non-market or unsystematic risk

1 can be eliminated through diversification. The risk that
2 cannot be eliminated through diversification is called
3 market, or systematic, risk. In addition, the CAPM presumes
4 that investors only require compensation for systematic
5 risk, which is the result of macroeconomic and other events
6 that affect the returns on all assets. The model is applied
7 by adding a risk-free rate of return to a market risk
8 premium, which is adjusted proportionately to reflect the
9 systematic risk of the individual security relative to the
10 total market as measured by the beta. The traditional CAPM
11 model is expressed as:

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

12
13
14 Where: R_s = Return rate on the common stock;

15 R_f = Risk-free rate of return;

16 R_m = Return rate on the market as a whole;

17 and

18 β = Adjusted beta (volatility of the
19 security relative to the market as a
20 whole)

21
22 Numerous tests of the CAPM have measured the extent to which
23 security returns and beta are related as predicted by the
24 CAPM, confirming its validity. The empirical CAPM ("ECAPM")
25 reflects the reality that while the results of these tests

1 support the notion that the beta is related to security
2 returns, the empirical Security Market Line ("SML")
3 described by the CAPM formula is not as steeply sloped as
4 the predicted SML.²⁸

5
6 **Q.** Why is the use of the ECAPM appropriate in determining the
7 ROE for Tampa Electric?

8
9 **A.** The ECAPM is a well-established model that has been relied
10 on in both academic and regulatory settings. Fama and French
11 clearly state regarding the figure in Document No. 14, that
12 "[t]he returns on the low beta portfolios are too high, and
13 the returns on the high beta portfolios are too low."²⁹

14
15 In addition, Morin observes that while the results of these
16 tests support the notion that Beta is related to security
17 returns, the empirical SML described by the CAPM formula is
18 not as steeply sloped as the predicted SML. Morin states:

19 With few exceptions, the empirical studies agree that
20 ... low-beta securities earn returns somewhat higher than
21 the CAPM would predict, and high-beta securities earn
22 less than predicted.³⁰

23 * * *

24 Therefore, the empirical evidence suggests that the
25 expected return on a security is related to its risk

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by the following approximation:

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

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

$$K = R_F + 0.25(R_M - R_F) + 0.75 \beta (R_M - R_F)^{31}$$

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

The early tests firmly reject the Sharpe-Lintner version of the CAPM. There is a positive relation between beta and average return, but it is too 'flat.'... The regressions consistently find that the intercept is greater than the average risk-free rate... and the coefficient on beta is less than the average excess market return... This is true in the early tests... as well as in more recent cross-section regressions tests, like Fama and French (1992).³²

Finally, Fama and French further note:

Confirming earlier evidence, the relation between beta and average return for the ten portfolios is much flatter than the Sharpe-Lintner CAPM predicts. The returns on low beta portfolios are too high, and the

1 returns on the high beta portfolios are too low. For
2 example, the predicted return on the portfolio with the
3 lowest beta is 8.3 percent per year; the actual return
4 is 11.1 percent. The predicted return on the portfolio
5 with the highest beta is 16.8 percent per year; the
6 actual is 13.7 percent.³³

7
8 Research from Dianna R. Harrington also supports the use of
9 the ECAPM. Harrington summarizes studies on the predicted
10 results of the CAPM versus the actual returns in her text
11 Modern Portfolio Theory & the Capital Asset Pricing Model:

12 So far we have learned some very interesting things
13 about the CAPM and reality. Some of the earliest
14 work tested realized data (history) against data
15 generated by simulated portfolios. Early studies by
16 Douglas (1969) and Lintner (Douglas [1969]) showed
17 discrepancies between what was expected on the
18 basis of the CAPM and the actual relationships that
19 were apparent in the capital markets.
20 Theoretically, the minimal rate of return from the
21 portfolios (the intercept) and the actual risk-free
22 rate for the period should have been equal. They
23 were not.

24 * * *

25 Another study, now more famous than Lintner's was

1 done by Black, Jensen, and Scholes (1972). Lintner
2 had used what is called a cross-sectional method
3 (looking at a number of stock returns during one
4 time period), whereas Black, Jensen, and Scholes
5 used a time-series method (using returns for a
6 number of stocks over several time periods). To
7 make their test, Black, Jensen, and Scholes assumed
8 that what had happened in the past was a good proxy
9 for the investor expectations (a frequent
10 assumption in CAPM tests). Using historical data,
11 they generated estimates using what we call the
12 market model:

$$R_{jt} = \alpha_j + \beta_j (R_{mt}) + \varepsilon_j$$

14 Where:

15 R = total returns

16 β = the slope of the line (the incremental return for
17 risk)

18 α = the intercept or a constant (expected to be 0 over
19 time and across all firms)

20 ε = an error term (expected to be random, without
21 information)

22 m = the market proxy

23 j = the firm or portfolio

24 t = the time period

25 Instead of using single stocks, they formed

1 portfolios in an effort to wash out one source of
2 error; because betas of single firms are quite
3 unstable. On the basis of the CAPM, they expected
4 to find

5 1. That the intercept was equal to the
6 risk-free rate (their proxy was the
7 Treasury bill rate)

8 2. That the capital market line had a
9 positive slope and that riskier
10 (higher beta) securities provided
11 higher return

12 Instead they found

13 1. That the intercept was different from
14 the risk-free rate

15 2. That high-risk securities earned less
16 and low-risk securities earned more
17 than predicted by the model

18 3. That the intercept seemed to depend on
19 the beta of any asset: high-beta
20 stocks had a different intercept than
21 low-beta stocks

22 * * *

23 Fama and MacBeth (1974) criticized the Black,
24 Jensen, and Scholes study (hereafter called BJS).
25 In a reformation of the study, they supported the

1 first of the BJS findings. They found that the
2 intercept exceeded the risk-free proxy, but did not
3 find the evidence to support the other BJS
4 conclusions.³⁴

5
6 Harrington discusses Black's potential solution to this
7 phenomenon:

8 Black's replacement for the risk-free asset was a
9 portfolio that had no covariability with the market
10 portfolio. Because the relevant risk in the CAPM is
11 systematic risk, a risk-free asset would be the one
12 with no volatility relative to the market - that
13 is, a portfolio with a beta of zero. All investor-
14 perceived levels of risk could be obtained from
15 various linear combinations of Black's zero-beta
16 portfolio and the market portfolio... Since R_z (the
17 rate of return of the zero-beta asset) and R_m are
18 uncorrelated (as R_f and R_m were assumed to be in the
19 simple CAPM), the investor can choose from various
20 combinations of R_z and R_m . On segment R_mY , R_z , is
21 sold short and proceeds are invested in R_m . On
22 segment R_zR_m , portions of the zero-beta portfolio
23 are purchased. At R_m , the investor is fully invested
24 in the market portfolio. The equilibrium CAPM was
25 rewritten by Black as follows:

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$$E (R_i) = (1 - \beta_i) E (R_z) + \beta_i E (R_m)$$

Where:
E indicates expected,
E (R_z) is less than E(R_m), and
R_z holdings over the whole market must be in equilibrium. That is, the number of short sellers and lenders of securities must be equal.
Black's adaptation is intriguing. The result of using this model is a capital market line that has a less steep slope and a higher intercept than those of the simple CAPM. If Black's model is more correct in its description of investor behavior in the marketplace, then the use of the simple model would produce equity return predictions that would be too low for stocks with betas greater than one and too high for stocks with betas of less than one.³⁵

Clearly, the justification from Morin, Fama and French, and Harrington, along with their reviews of other academic research on the CAPM, validate the use of the ECAPM. In addition, the New York Public Service Commission has been using this form of the CAPM, with factors of 0.25 and 0.75, since the mid-1990s. As such, the ECAPM is a well-established model that has been relied on in both academic and regulatory settings. I continue to believe it is an

1 appropriate model to estimate Tampa Electric's ROE, and in
2 view of theory and practical research, I have applied both
3 the traditional CAPM and the ECAPM to the companies in the
4 Utility Proxy Group and averaged the results.

5
6 **Q.** What betas did you use in your CAPM analysis?

7
8 **A.** For the betas in my CAPM analysis, I considered two sources:
9 *Value Line* and Bloomberg. While both of those services
10 adjust their calculated (or "raw") betas to reflect the
11 tendency of the beta to regress to the market mean of 1.00,
12 *Value Line* calculates the beta over a five-year period,
13 while Bloomberg calculates it over a two-year period.

14
15 **Q.** Please describe your selection of a risk-free rate of
16 return.

17
18 **A.** As shown in Column 5, page 1 of Document No. 6, the risk-
19 free rate adopted for both applications of the CAPM is 4.15
20 percent. This risk-free rate is based on the average of the
21 *Blue Chip* consensus forecast of the expected yields on 30-
22 year U.S. Treasury bonds for the six quarters ending with
23 the second calendar quarter of 2025, and long-term
24 projections for the years 2025 to 2029 and 2030 to 2034.

25

1 Q. Why is the yield on long-term U.S. Treasury bonds
2 appropriate for use as the risk-free rate?

3

4 A. The yield on long-term U.S. Treasury bonds is almost risk-
5 free and its term is consistent with the long-term cost of
6 capital of public utilities measured by the yields on
7 Moody's A2-rated public utility bonds; the long-term
8 investment horizon inherent in utilities' common stocks; and
9 the long-term life of the jurisdictional rate base to which
10 the allowed fair rate of return (*i.e.*, cost of capital) will
11 be applied. In contrast, short-term U.S. Treasury yields are
12 more volatile and largely a function of Federal Reserve
13 monetary policy.

14

15 Q. Please explain the estimation of the expected risk premium
16 for the market used in your CAPM analyses.

17

18 A. The basis of the market risk premium is explained in detail
19 in note 1, page 2 of Document No. 6. As discussed above, the
20 market risk premium is derived from an average of three
21 historical data-based market risk premiums, two *Value Line*
22 data-based market risk premiums, and one Bloomberg data-
23 based market risk premium.

24

25 The long-term income return on U.S. Government securities

1 of 5.00 percent was deducted from the SBBI - 2023 monthly
2 historical total market return of 12.03 percent, which
3 results in an historical market equity risk premium of 7.03
4 percent.³⁶ I applied a linear OLS regression to the monthly
5 annualized historical returns on the S&P 500 relative to
6 historical yields on long-term U.S. Government securities
7 from SBBI - 2023. That regression analysis yielded a market
8 equity risk premium of 8.27 percent. The PRPM market equity
9 risk premium is 10.44 percent and is derived using the PRPM
10 relative to the yields on long-term U.S. Treasury securities
11 from January 1926 through December 2023.

12
13 The *Value Line*-derived forecasted total market equity risk
14 premium is derived by deducting the forecasted risk-free
15 rate of 4.15 percent, discussed above, from the *Value Line*
16 projected total annual market return of 15.15 percent,
17 resulting in a forecasted total market equity risk premium
18 of 11.00 percent. The S&P 500 projected market equity risk
19 premium using *Value Line* data is derived by subtracting the
20 projected risk-free rate of 4.15 percent from the projected
21 total return of the S&P 500 of 14.14 percent. The resulting
22 market equity risk premium is 9.99 percent.

23
24 The S&P 500 projected market equity risk premium using
25 Bloomberg data is derived by subtracting the projected risk-

1 free rate of 4.15 percent from the projected total return
2 of the S&P 500 of 17.52 percent. The resulting market equity
3 risk premium is 13.37 percent. These six measures, when
4 averaged, result in an average total market equity risk
5 premium of 10.02 percent as shown on page 2 of Document No.
6 6.

7
8 **Q.** What are the results of your application of the traditional
9 and empirical CAPM to the Utility Proxy Group?

10
11 **A.** As shown on page 1 of Document No. 6, the adjusted mean
12 result of my CAPM/ECAPM analyses is 12.45 percent, the
13 adjusted median is 12.50 percent, and the average of the two
14 is 12.48 percent. Consistent with my reliance on the average
15 of mean and median DCF results discussed above, the
16 indicated common equity cost rate using the CAPM/ECAPM is
17 12.48 percent.

18
19 ***Common Equity Cost Rates for a Proxy Group of Domestic, Non-Price***
20 ***Regulated Companies Based on the DCF, RPM, and CAPM***

21 **Q.** Why do you also consider a proxy group of domestic, non-
22 price regulated companies?

23
24 **A.** Although I am not an attorney, my interpretation of the *Hope*
25 and *Bluefield* cases is that they did not specify that

1 comparable risk companies had to be utilities. Since the
2 purpose of rate regulation is to be a substitute for
3 marketplace competition, non-price regulated firms
4 operating in the competitive marketplace make an excellent
5 proxy if they are comparable in total risk to the Utility
6 Proxy Group being used to estimate the cost of common equity.
7 The selection of such domestic, non-price regulated
8 competitive firms theoretically and empirically results in
9 a proxy group that is comparable in total risk to the Utility
10 Proxy Group, since all of these companies compete for
11 capital in the exact same markets.

12
13 **Q.** How did you select non-price regulated companies that are
14 comparable in total risk to the Utility Proxy Group?

15
16 **A.** In order to select a proxy group of domestic, non-price
17 regulated companies similar in total risk to the Utility
18 Proxy Group, I relied on the betas and related statistics
19 derived from *Value Line* regression analyses of weekly market
20 prices over the most recent 260 weeks (*i.e.*, five years).
21 These selection criteria resulted in a proxy group of 48
22 domestic, non-price regulated firms comparable in total risk
23 to the Utility Proxy Group. Total risk is the sum of non-
24 diversifiable market risk and diversifiable company-
25 specific risks. The criteria used in selecting the domestic,

1 non-price regulated firms were:

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

12
13 Betas measure market, or systematic, risk, which is not
14 diversifiable. The residual standard errors of the
15 regressions measure each firm's company-specific,
16 diversifiable risk. Companies that have similar betas and
17 similar residual standard errors resulting from the same
18 regression analyses have similar total investment risk.

19
20 **Q.** Have you prepared a schedule which shows the data from which
21 you selected the 45 domestic, non-price regulated companies
22 that are comparable in total risk to the Utility Proxy Group?

23
24 **A.** Yes, the basis of my selection and both proxy groups'
25 regression statistics are shown in Document No. 7.

1 Q. Did you calculate common equity cost rates using the DCF
2 model, RPM, and CAPM for the Non-Price Regulated Proxy
3 Group?
4

5 A. Yes. Because the DCF model, RPM, and CAPM have been applied
6 in an identical manner as described above, I will not repeat
7 the details of the rationale and application of each model.
8 One exception is in the application of the RPM, where I did
9 not use public utility-specific equity risk premiums.
10

11 Page 2 of Document No. 8 derives the constant growth DCF
12 model common equity cost rate. As shown, the indicated
13 common equity cost rate, using the constant growth DCF for
14 the Non-Price Regulated Proxy Group comparable in total risk
15 to the Utility Proxy Group, is 10.80 percent.
16

17 Pages 3 through 5 of Document No. 8 contain the data and
18 calculations that support the 13.76 percent RPM common
19 equity cost rate. As shown on line 1, page 3 of Document No.
20 8, the consensus prospective yield on Moody's Baa-rated
21 corporate bonds for the six quarters ending in the second
22 quarter of 2025, and for the years 2025 to 2029 and 2030 to
23 2034, is 5.95 percent.³⁷ Since the Non-Price Regulated Proxy
24 Group has an average Moody's long-term issuer rating of A3,
25 a downward adjustment of 0.28 percent to the projected Baa2-

1 rated corporate bond yield is necessary to reflect the
2 difference in ratings which results in a projected A3-rated
3 corporate bond yield of 5.67 percent for the Non-Regulated
4 Proxy Group.

5
6 When the Beta-adjusted risk premium of 8.09 percent (as
7 derived on page 5 of Document No. 8) relative to the Non-
8 Price Regulated Proxy Group is added to the prospective A3
9 -rated corporate bond yield of 5.67 percent, the indicated
10 RPM common equity cost rate is 13.76 percent.

11
12 Page 6 of Document No. 8 contains the inputs and calculations
13 that support my indicated CAPM/ECAPM common equity cost rate
14 of 13.28 percent.

15
16 **Q.** What is the cost rate of common equity based on the Non-
17 Price Regulated Proxy Group comparable in total risk to the
18 Utility Proxy Group?

19
20 **A.** As shown on page 1 of Document No. 8, the results of the
21 common equity models applied to the Non-Price Regulated
22 Proxy Group - which group is comparable in total risk to the
23 Utility Proxy Group - are as follows: 10.80 percent (DCF),
24 13.76 percent (RPM), and 13.28 percent (CAPM). The average
25 of the mean and median of these models is 12.95 percent,

1 which I used as the indicated common equity cost rates for
2 the Non-Price Regulated Proxy Group.

3
4 **VII. CONCLUSION OF COMMON EQUITY COST RATE BEFORE ADJUSTMENTS**

5 **Q.** What is the indicated common equity cost rate before
6 adjustments?

7
8 **A.** By applying multiple cost of common equity models to the
9 Utility Proxy Group and the Non-Price Regulated Proxy Group,
10 the indicated range of common equity cost rates attributable
11 to the Utility Proxy Group before any relative risk
12 adjustments is between 9.89 percent (DCF model result) and
13 12.48 percent (CAPM result) and 9.89 percent to 12.41
14 percent excluding the PRPM in the market risk premium as
15 shown in Document No. 2. I used multiple cost of common
16 equity models as primary tools in arriving at my recommended
17 common equity cost rate because no single model is so
18 inherently precise that it can be relied on to the exclusion
19 of other theoretically sound models. Using multiple models
20 adds reliability to the estimated common equity cost rate,
21 with the prudence of using multiple cost of common equity
22 models supported in both the financial literature and
23 regulatory precedent.

24
25 Based on these common equity cost rate results, I conclude

1 that a range of common equity cost rates between 9.89 percent
2 and 12.48 percent is reasonable and appropriate before any
3 adjustments for relative risk differences between the
4 company and the Utility Proxy Group are made.
5

6 **VIII. ADJUSTMENTS TO THE COMMON EQUITY COST RATE**

7 ***Flotation Costs***

8 **Q.** What are flotation costs?
9

10 **A.** Flotation costs are those costs associated with the sale of
11 new issuances of common stock. They include market pressure
12 and the mandatory unavoidable costs of issuance (e.g.,
13 underwriting fees and out-of-pocket costs for printing,
14 legal, registration, etc.). For every dollar raised through
15 debt or equity offerings, the company receives less than one
16 full dollar in financing.
17

18 **Q.** Has the Commission supported the use of flotation cost
19 adjustments in past rate proceedings?
20

21 **A.** Yes. In Peoples Gas System, Inc.'s recent 2023 rate proceeding
22 the Commission noted:

23 In PGS's last rate case in 2008, we did not make a
24 specific adjustment for flotation costs, but in our
25 order we stated that we have traditionally recognized

1 a reasonable adjustment for flotation costs in the
2 determination of the investor required return...We find
3 witness D'Ascendis's method to determine the flotation
4 cost is credible and provided persuasive evidence for
5 his recommendation to include a flotation cost of 9
6 basis points.³⁸

7
8 **Q.** Why is it important to recognize flotation costs in the
9 allowed common equity cost rate?

10
11 **A.** It is important because there is no other mechanism in the
12 ratemaking paradigm through which such costs can be
13 recognized and recovered. Because these costs are real,
14 necessary, and legitimate, recovery of these costs should
15 be permitted. As noted by Morin:

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

20 The simple fact of the matter is that common equity
21 capital is not free... [Flotation costs] must be
22 recovered through a rate of return adjustment.³⁹

23
24 **Q.** Should flotation costs be recognized whether or not there is
25 a stock issuance of additional shares during the test year?

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

15
16 Historical flotation costs are a permanent loss of investment
17 to the utility and should be accounted for. When any company,
18 including a utility, issues common stock, flotation costs are
19 incurred for legal, accounting, printing fees and the like.
20 For each dollar of issuing market price, a small percentage
21 is expensed and is permanently unavailable for investment in
22 utility rate base. Since these expenses are charged to capital
23 accounts and not expensed on the income statement, the only
24 way to restore the full value of that dollar of issuing price
25 with an assumed investor required return of 10.00 percent is

1 for the net investment, \$0.95, to earn more than 10.00 percent
2 to net back to the investor a fair return on that dollar. In
3 other words, if a company issues stock at \$1.00 with 5.00
4 percent in flotation costs, it will net \$0.95 in investment.
5 Assuming the investor in that stock requires a 10.00 percent
6 return on his or her invested \$1.00 (*i.e.*, a return of \$0.10),
7 the company needs to earn approximately 10.5 percent on its
8 invested \$0.95 to receive a \$0.10 return.

9
10 **Q.** Do the common equity cost rate models you have used already
11 reflect investors' anticipation of flotation costs?

12
13 **A.** No. All of these models assume no transaction costs. The
14 literature is quite clear that these costs are not reflected
15 in the market prices paid for common stocks. For example,
16 Brigham and Daves confirm this and provide the methodology
17 utilized to calculate the flotation adjustment.⁴⁰ In
18 addition, Morin confirms the need for such an adjustment
19 even when no new equity issuance is imminent.⁴¹
20 Consequently, it is proper to include a flotation cost
21 adjustment when using cost of common equity models to
22 estimate the common equity cost rate.

23
24 **Q.** How did you calculate the flotation cost allowance?
25

1 **A.** I modified the DCF calculation to provide a dividend yield
2 that would reimburse investors for issuance costs in
3 accordance with the method cited in literature by Brigham
4 and Daves, as well as by Morin. The flotation cost adjustment
5 recognizes the actual costs of issuing equity that were
6 incurred by Tampa Electric's parent, Emera, in its equity
7 issuances since its acquisition of Tampa Electric. Based on
8 the issuance costs shown on page 1 of Document No. 9, an
9 adjustment of 0.10 percent is required to reflect the
10 flotation costs applicable to the Utility Proxy Group.

11

12 ***Credit Risk Adjustment***

13 **Q.** Please discuss your proposed credit risk adjustment.

14

15 **A.** Tampa Electric's long-term issuer ratings are A3 and BBB+
16 from Moody's Investors Services and S&P, respectively, which
17 are slightly less risky than the average long-term issuer
18 ratings for the Utility Proxy Group of Baal and BBB+,
19 respectively.⁴² Hence, a downward credit risk adjustment is
20 necessary to reflect the less risky credit rating, i.e., A3,
21 of Tampa Electric relative to the Baal average Moody's bond
22 rating of the Utility Proxy Group.⁴³

23

24 An indication of the magnitude of the necessary downward
25 adjustment to reflect the lesser credit risk inherent in a A3

1 bond rating is one-third of a recent three-month average
2 spread between Moody's A2 and Baa2-rated public utility bond
3 yields of 0.25 percent, shown on page 4 of Document No. 5, or
4 0.08 percent.⁴⁴

5
6 ***Other Considerations***

7 **Q.** What company-specific business risks did you consider in
8 your analysis?

9
10 **A.** As detailed below, I've considered the company's size
11 relative to the Utility Proxy Group, lack of geographic
12 diversification, and higher climate risk relative to the
13 Utility Proxy Group in my ROE recommendation.

14
15 **Q.** Why is it necessary to consider Tampa Electric's size
16 relative to the Utility Proxy Group?

17
18 **A.** A smaller size relative to the Utility Proxy Group companies
19 indicates greater relative business risk for the company
20 because, all else being equal, size has a material bearing on
21 risk. Size affects business risk because smaller companies
22 generally are less able to cope with significant events that
23 affect sales, revenues and earnings. For example, smaller
24 companies face more risk exposure to business cycles and
25 economic conditions, both nationally and locally.

1 Additionally, the loss of revenues from a few larger customers
2 would have a greater effect on a small company than on a
3 bigger company with a larger, more diverse, customer base.
4 This is true for utilities, as well as for non-regulated
5 companies.

6
7 As further evidence that smaller firms are riskier, investors
8 generally demand greater returns from smaller firms to
9 compensate for less marketability and liquidity of their
10 securities. Kroll's Cost of Capital Navigator: U.S. Cost of
11 Capital Module ("Kroll") discusses the nature of the small-
12 size phenomenon, providing an indication of the magnitude of
13 the size premium based on several measures of size. In
14 discussing "Size as a Predictor of Equity Premiums," Kroll
15 states:

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

1 and historical equity returns - as size *decreases*,
2 returns tend to *increase*, and vice versa. (footnote
3 omitted) (emphasis in original)⁴⁵

4
5 Furthermore, in "The Capital Asset Pricing Model: Theory and
6 Evidence," Fama and French note size is indeed a risk factor
7 which must be reflected when estimating the cost of common
8 equity. On page 14, they note:

9 . . . the higher average returns on small stocks
10 and high book-to-market stocks reflect unidentified
11 state variables that produce undiversifiable risks
12 (covariances) in returns not captured in the market
13 return and are priced separately from market
14 betas.⁴⁶

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

19
20 Also, it is a basic financial principle that the use of funds
21 invested, and not the source of funds, is what gives rise to
22 the risk of any investment.⁴⁷ Eugene Brigham, a well-known
23 authority, states:

24 A number of researchers have observed that
25 portfolios of small-firms (sic) have earned

1 consistently higher average returns than those of
2 large-firm stocks; this is called the "small-firm
3 effect." On the surface, it would seem to be
4 advantageous to the small firms to provide average
5 returns in a stock market that are higher than those
6 of larger firms. In reality, it is bad news for the
7 small firm; **what the small-firm effect means is**
8 **that the capital market demands higher returns on**
9 **stocks of small firms than on otherwise similar**
10 **stocks of the large firms.** (emphasis added)⁴⁸

11
12 Consistent with the financial principle of risk and return
13 discussed above, increased relative risk due to small size
14 must be considered in the allowed rate of return on common
15 equity.

16
17 **Q.** Is a relative risk adjustment due to Tampa Electric's small
18 size when compared to the Utility Proxy Group necessary in
19 this proceeding?

20
21 **A.** No. Tampa Electric has similar risk to the average utility
22 in the Utility Proxy Group because, Tampa Electric is
23 similar in size to the Utility Proxy Group companies. I
24 measured Tampa Electric's size based on an estimated market
25 capitalization of common equity for Tampa Electric (whose

1 common stock is not publicly traded).

2
3 As shown on Document No. 10, Tampa Electric's estimated
4 market capitalization was \$8.98 billion as of December 29,
5 2023, compared with the market capitalization of the average
6 company in the Utility Proxy Group of \$15.9 billion as of
7 December 29, 2023. The average company in the Utility Proxy
8 Group has a market capitalization 1.8 times the size of
9 Tampa Electric's estimated market capitalization.

10
11 As a result, it is necessary to consider if an adjustment
12 to the indicated range of common equity cost rates
13 attributable to the Utility Proxy Group is necessary solely
14 on the difference in size between the two. The determination
15 is based on the size premiums for portfolios of New York
16 Stock Exchange, American Stock Exchange, and NASDAQ listed
17 companies ranked by deciles for the 1926 to 2022 period. The
18 average size premium for the Utility Proxy Group with a
19 market capitalization of \$15.9 billion falls in the 2nd
20 decile, while the company's estimated market capitalization
21 of \$8.98 billion places it in the 3rd decile. The size
22 premium spread between the 2nd decile and the 3rd decile is
23 0.12 percent. It is my determination that the size premium
24 spread between the 2nd and 3rd decile of 0.12 percent is not
25 significant enough to include it in the determination of my

1 recommended range of ROEs at this time. That said, the
2 company's lack of geographic diversity due to its small size
3 is cause for concern.

4
5 **Q.** Please describe the company's lack of geographic diversity
6 and why that increases its relative risk?

7
8 **A.** Tampa Electric's service area in West Central Florida is
9 extremely compact compared to other Florida investor-owned
10 utilities or the Utility Proxy Group as shown on Document
11 No. 11. In the event of a substantial storm or other
12 catastrophic event, the entire system and customer base of
13 Tampa Electric is at risk for damage, outages, and other
14 customer impacts. This is unlike other utilities in Florida,
15 and more importantly, the Utility Proxy Group, which have
16 more geographically diverse service areas or larger service
17 territories, which may only have a portion of the system
18 assets and customer base affected in the case of storms or
19 other natural disasters or catastrophic events, allowing the
20 unaffected areas and assets to help mitigate certain impacts
21 and help sustain the utility while repairs are made in
22 affected areas. Tampa Electric's smaller size and limited
23 geographic diversity have also been recognized as key risks
24 in the company's recent S&P and Moody's credit ratings
25 reports.⁴⁹

1 Q. How did you assess Tampa Electric's risk associated with
2 extreme weather?

3
4 A. The Federal Emergency Management Agency ("FEMA") calculates
5 the National Risk Index ("NRI") for each county in the United
6 States. The measure is calculated as the expected annual
7 loss⁵⁰ associated with 18 naturally occurring hazards (e.g.,
8 hurricanes, floods, earthquakes, etc.) multiplied by a
9 community risk factor, which is determined based on social
10 vulnerability of the county and community resilience. The
11 resulting risk index measures the potential for negative
12 effects of naturally occurring hazards. Of the 3,143
13 counties in the United States, Hillsborough County, which
14 includes Tampa and a majority of Tampa Electric's customers,
15 is ranked 15th in terms of risk and carries a risk rating of
16 Very High (the highest risk rating). That ranking is driven
17 by the fourth highest expected annual loss value associated
18 with hurricanes of all counties in the United States.

19
20 Further, between 1980 and 2023 Florida trails only Texas for
21 the highest cost associated with major natural disasters
22 that resulted in over \$1 billion in costs (CPI-adjusted),
23 incurring over \$390 billion as a result of weather-related
24 events during that period.⁵¹ Over the most recent five
25 years, Florida leads all states in terms of costs associated

1 with major weather events, incurring between \$100 billion
2 and \$200 billion.⁵²

3
4 In addition, such major weather events are becoming more
5 common. Since 2014, there were a total of 58 severe storms
6 or tropical cyclones that impacted Florida and resulted in
7 at least \$1 billion in damages, 21 of which occurred after
8 2019.⁵³ In the ten-year period between 2014 and 2023 there
9 were ten *more* such events than in the 34 years from 1980
10 through 2013 (34 and 24 weather events, respectively).

11
12 **Q.** Is Tampa Electric's risk associated with extreme weather
13 relatively high as compared to the Utility Proxy Group?

14
15 **A.** Yes, it is. As shown in Document No. 12, I calculated two
16 measures based on the FEMA NRI data. First, I calculated the
17 average risk score for each of the companies in the Utility
18 Proxy Group and for Tampa Electric based on the counties in
19 which they operate. In addition, using the same data, I also
20 calculated a county area (i.e., square miles) weighted risk
21 score. That is, larger counties within a proxy company's
22 service area have a higher weight in calculating the
23 weighted average risk score. As shown in Document No. 12,
24 the average and median risk scores for the Utility Proxy
25 Group fall in the Relatively Low category, while Tampa

1 Electric's risk score is higher than any of the companies
2 in the Utility Proxy Group and falls at the high end of the
3 Relatively High category. As noted above, Hillsborough
4 County, which includes the city of Tampa falls in the Very
5 High risk category. Based on those results, Tampa Electric
6 has a uniquely high level of risk as compared to the Utility
7 Proxy Group.

8
9 **Q.** Does Tampa Electric's storm reserve insulate the company
10 from the risks associated with hurricanes?

11
12 **A.** Not entirely. Tampa Electric utilizes a storm reserve, which
13 is funded through base rates for restoration costs
14 associated with major storms. The storm reserve can be as
15 high as \$56 million, which is the level of the reserve as
16 of October 31, 2013.⁵⁴ Tampa Electric may petition the
17 Commission for recovery of restoration costs above the storm
18 reserve and to replenish the storm reserve. The storm cost
19 recovery surcharge is capped at \$4.00/ 1,000 kWh for a 12-
20 month period. However, Tampa Electric can petition the
21 Commission to increase the surcharge or extend the recovery
22 period if the company incurs costs greater than \$100 million
23 in a given calendar year.⁵⁵ The company recently had to
24 petition the Commission for such a surcharge and extension
25 of the recovery period in response to Hurricanes Ian and

1 Nicole in late 2022, which resulted in total restoration
2 costs of \$134 million. The restoration costs are being
3 recovered through a surcharge to customers' bills beginning
4 April 2023 and ending in December 2024. In September 2023,
5 Tampa Electric also incurred \$35 million in storm
6 restoration costs associated with Hurricane Idalia. The
7 company has not yet sought recovery of those costs.⁵⁶
8

9 As shown by the company's recent experience, the level of
10 the storm reserve does not cover the total restoration
11 expenses associated with hurricanes that have a larger
12 effect on the company's service territory, such as Hurricane
13 Ian. As a result, even with the possibility to recover costs
14 by petitioning the Commission outside of a rate case,
15 regulatory lag remains, especially for significant storms
16 with costs over \$100 million. For example, Tampa Electric's
17 storm related costs incurred in September and November 2022
18 will not be fully recovered until December 2024. In
19 addition, the risk of disallowances of restoration costs
20 remains as well. Further, the increased frequency of
21 hurricanes and other large storms will only serve to
22 increase restoration costs and the need to recover those
23 costs. As noted above, restoration costs associated with
24 Hurricane Idalia have not yet been recovered but have been
25 incurred by Tampa Electric. This occurred while Tampa

1 Electric was still recovering its restoration costs
2 associated with two prior hurricanes, which included an
3 extension to the recovery period beyond a single calendar
4 year.

5
6 **Q.** Have credit rating agencies noted Tampa Electric's risk
7 associated with hurricanes?

8
9 **A.** Yes, they have. Although Moody's notes that it views the
10 Commission's regulatory treatment of storm costs as credit
11 supportive, it also states that, "Tampa Electric is a
12 relatively small utility with a concentrated service
13 territory along the Gulf Coast of western central Florida,
14 making it vulnerable to storm related event risk."⁵⁷ S&P
15 similarly notes that, "[Tampa Electric's] service territory
16 is more susceptible to physical risks related to
17 hurricanes,"⁵⁸ and also finds that, "Relative to peers,
18 physical risks associated with coastal storms are evident..."⁵⁹

19
20 **Q.** What are your conclusions as they relate to Tampa Electric's
21 risk associated with extreme weather?

22
23 **A.** Tampa Electric faces relatively higher risk from extreme
24 weather events as compared to the Utility Proxy Group. Tampa
25 Electric's customer base is highly concentrated in the city

1 of Tampa and Hillsborough County. Hillsborough County is one
2 of the highest risk counties in the United States as it
3 relates to the potential effect of natural disasters. In
4 addition, the frequency of major storms impacting Florida
5 has increased in recent years. Although Tampa Electric has
6 the ability to utilize a storm reserve and petition the
7 Commission to recover additional restoration costs above the
8 reserve level, that regulatory framework does not eliminate
9 the risk faced by the company. As such, Tampa Electric's
10 relatively higher risk associated with extreme weather is
11 unique to the company (as compared to the Utility Proxy
12 Group) and should be considered when determining the
13 appropriate ROE in this proceeding.

14
15 **Q.** Have you considered any other company-specific issues in
16 your recommended ROE?

17
18 **A.** Yes, I have. In addition to the company's flotation costs,
19 relative credit rating, and its smaller relative size I have
20 also considered the company's high customer growth, and
21 level of capital expenditures compared to the Utility Proxy
22 Group companies in my ROE recommendation.

23
24 **Q.** Please describe the company's high customer growth.
25

1 **A.** Tampa Electric's total number of retail customers has
2 increased by 63,500 (*i.e.*, approximately 8.4 percent) over
3 the past five years.⁶⁰ The increased customer growth in
4 Tampa Electric's service territory necessitates increased
5 and accelerated capital investment.

6

7 **Q.** Please briefly summarize the company's capital investment
8 plans.

9

10 **A.** Tampa Electric currently plans to invest over \$6.2 billion
11 of additional capital over the 2024-2027 period,⁶¹ which
12 represents over 68.00 percent of its 2022 year-end net
13 utility plant.⁶² That amount includes investments required
14 to support growth, and to maintain safe, sufficient, and
15 reliable service in both its transmission and distribution
16 facilities. As discussed by Mr. Chronister, the company will
17 require continued access to the capital markets, at
18 reasonable terms, to finance its capital spending plan. As
19 the company moves forward with its capital spending plan,
20 timely recovery of its capital costs is critical to mitigate
21 the delay of capital recovery and execute its capital
22 spending program.

23

24 **Q.** Do substantial capital expenditures directly relate to a
25 utility being allowed the opportunity to earn a return

1 adequate to attract capital at reasonable terms?

2
3 **A.** Yes, they do. The allowed ROE should enable the subject
4 utility to finance capital expenditures and working capital
5 requirements at reasonable rates, and to maintain its
6 financial integrity in a variety of economic and capital
7 market conditions. As discussed throughout my direct
8 testimony, a return adequate to attract capital at
9 reasonable terms enables the utility to provide safe,
10 reliable service while maintaining its financial soundness.
11 To the extent a utility is provided the opportunity to earn
12 its market-based cost of capital, neither customers nor
13 shareholders should be disadvantaged. These requirements are
14 of particular importance to a utility when it is engaged in
15 a substantial capital expenditure program.

16
17 The ratemaking process is predicated on the principle that,
18 for investors and companies to commit the capital needed to
19 provide safe and reliable utility services, the utility must
20 have the opportunity to recover the return of, and the
21 market-required return on, invested capital. Regulatory
22 commissions recognize that since utility operations are
23 capital intensive, regulatory decisions should enable the
24 utility to attract capital at reasonable terms; doing so
25 balances the long-term interests of the utility and its

1 ratepayers.

2
3 Further, the financial community carefully monitors the
4 current and expected financial conditions of utility
5 companies, as well as the regulatory environment in which
6 those companies operate. In that respect, the regulatory
7 environment is one of the most important factors considered
8 in both debt and equity investors' assessments of risk. That
9 is especially important during periods in which the utility
10 expects to make significant capital investments and,
11 therefore, may require access to capital markets.

12
13 **Q.** Do credit rating agencies recognize risk associated with
14 increased capital expenditures?

15
16 **A.** Yes, they do. From a credit perspective, the additional
17 pressure on cash flows associated with high levels of
18 capital expenditures exerts corresponding pressure on credit
19 metrics and, therefore, credit ratings. S&P has noted
20 several long-term challenges for utilities' financial health
21 including: heavy construction programs to address demand
22 growth; declining capacity margins; and aging infrastructure
23 and regulatory responsiveness to mounting requests for rate
24 increases.⁶³ S&P noted:

25 We assume that capital spending will remain a focus of

1 most utility managements and strain credit metrics. It
2 provides growth when sales are diminished by ongoing
3 demanded efficiency from regulators and other trends,
4 and it is welcomed by policymakers that appreciate the
5 economic stimulus and the benefits of safer, more
6 reliable service. The speed with which the regulatory
7 process turns the new spending into higher rates to
8 begin to pay for it is an important factor in our
9 assumptions and the forecast. Any extended lag between
10 spending and recovery can exacerbate the negative
11 effect on credit metrics and therefore ratings.⁶⁴

12
13 The rating agency views noted above also are consistent with
14 certain observations discussed in my direct testimony: (1)
15 the benefits of maintaining a strong financial profile are
16 significant when capital access is required and become
17 particularly acute during periods of market instability; and
18 (2) the Commission's decision in this proceeding will have
19 a direct bearing on the company's credit profile and its
20 ability to access the capital needed to fund its
21 investments.

22
23 **Q.** How do the company's expected capital expenditures compare
24 to the Utility Proxy Group?
25

1 **A.** To reasonably make that comparison, I calculated the ratio
2 of expected capital expenditures to net plant for each
3 company in the Utility Proxy Group. I performed that
4 calculation using Tampa Electric's projected capital
5 expenditures during 2024 through 2027 relative to its net
6 plant for the year ended December 31, 2022. As shown in
7 Document No. 13, Tampa Electric has the highest ratio of
8 projected capital expenditures to net plant relative to the
9 Utility Proxy Group, approximately 26.00 percent higher than
10 the Utility Proxy Group median.

11

12 **Q.** What are your conclusions regarding the effect of Tampa
13 Electric's capital investment plan on its risk profile and
14 cost of capital?

15

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

22

23 **Q.** What is the indicated cost of common equity after your
24 company-specific adjustments?

25

1 **A.** Applying the 0.10 percent flotation cost adjustment and the
2 negative 0.08 percent credit risk adjustment to the
3 indicated range of common equity cost rates between 9.89
4 percent and 12.48 percent results in a company-specific
5 range of common equity rates between 9.90 percent and 12.49
6 percent. Applying the same adjustments to the 9.89 percent
7 to 12.89 percent range excluding the PRPM from the market
8 risk premium produces a range of 9.90 percent to 12.42
9 percent. In consideration of these indicated ranges in
10 addition to the company's relatively small service area,
11 weather risk, high customer growth, and its substantial
12 capital expenditure program, I recommend an ROE of 11.50
13 percent for Tampa Electric in this proceeding.

14

15 **IX. CONCLUSION**

16 **Q.** What is your recommended ROE for Tampa Electric?

17

18 **A.** Given the discussion above and the results from the analyses
19 that I have performed, I recommend that an ROE of 11.50
20 percent is appropriate for the company at this time.

21

22 **Q.** In your opinion, is your proposed ROE of 11.50 percent fair
23 and reasonable to the company and its customers?

24

25 **A.** Yes, it is.

1 Q. In your opinion, is the company's proposed equity ratio of
2 54.00 percent fair and reasonable to the company and its
3 customers?

4

5 A. Yes, it is.

6

7 Q. Does this conclude your prepared direct testimony?

8

9 A. Yes, it does.

10

11

12

13

14

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DOCKET NO. 20240026-EI

WITNESS: D'ASCENDIS

FILED: 04/02/2024

EXHIBIT

OF

DYLAN W. D'ASCENDIS, CRRA, CVA

ON BEHALF OF TAMPA ELECTRIC COMPANY

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

Summary

Dylan is an experienced consultant and a Certified Rate of Return Analyst (CRRA) and Certified Valuation Analyst (CVA). Dylan joined ScottMadden in 2016 and is a leading expert witness with respect to cost of capital, capital structure, and valuation. He has served as a consultant for investor-owned and municipal utilities and authorities for 15 years. Dylan has testified as an expert witness on over 150 occasions regarding rate of return, cost of service, rate design, and valuation before more than 35 regulatory jurisdictions in the United States and Canada, an American Arbitration Association panel, and the Superior Court of Rhode Island. He also maintains the benchmark index against which the Hennessy Gas Utility Mutual Fund performance is measured. Dylan holds a B.A. in economic history from the University of Pennsylvania and an M.B.A. with concentrations in finance and international business from Rutgers University.

Areas of Specialization

- Expert Witness Testimony
- Rates and Regulation
- Return on Equity
- Valuation
- Utility Regulations
- Rate Case Planning, Management, and Support
- Utility Benchmarking

Recent Articles and Speeches

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

Recent Assignments

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



Sponsor	Date	Case/Applicant	Docket No.	Subject
Regulatory Commission of Alaska				
Alaska Power Company	08/23	Alaska Power Company	Docket No. TA 909-2 / U-23-054	Capital Structure
ENSTAR Natural Gas Company	08/22	ENSTAR Natural Gas Company	Docket No. TA334-4	Rate of Return
Cook Inlet Natural Gas Storage Alaska, LLC	07/21	Cook Inlet Natural Gas Storage Alaska, LLC	Docket No. TA45-733	Capital Structure
Alaska Power Company	09/20	Alaska Power Company; Goat Lake Hydro, Inc.; BBL Hydro, Inc.	Tariff Nos. TA886-2; TA6-521; TA4-573	Capital Structure
Alaska Power Company	07/16	Alaska Power Company	Docket No. TA857-2	Rate of Return
Alberta Utilities Commission				
AltaLink, L.P., and EPCOR Distribution & Transmission, Inc.	02/23	AltaLink, L.P., and EPCOR Distribution & Transmission, Inc.	Proceeding ID. 27084	Determination of Cost-of-Capital Parameters
AltaLink, L.P., and EPCOR Distribution & Transmission, Inc.	01/20	AltaLink, L.P., and EPCOR Distribution & Transmission, Inc.	2021 Generic Cost of Capital, Proceeding ID. 24110	Rate of Return
Arizona Corporation Commission				
Foothills Water & Sewer, LLC	10/23	Foothills Water & Sewer, LLC	Docket No. WS-21182A-23-0292	Rate of Return and Fair Value Rate Base
Arizona Water Company	12/22	Arizona Water Company – Eastern Group	Docket No. W-01445A-22-0286	Rate of Return
EPCOR Water Arizona, Inc.	08/22	EPCOR Water Arizona, Inc.	Docket No. WS-01303A-22-0236	Rate of Return
EPCOR Water Arizona, Inc.	06/20	EPCOR Water Arizona, Inc.	Docket No. WS-01303A-20-0177	Rate of Return
Arizona Water Company	12/19	Arizona Water Company – Western Group	Docket No. W-01445A-19-0278	Rate of Return
Arizona Water Company	08/18	Arizona Water Company – Northern Group	Docket No. W-01445A-18-0164	Rate of Return
Arkansas Public Service Commission				
Summit Utilities Arkansas, Inc.	01/24	Summit Utilities Arkansas, Inc.	Docket No. 23-079-U	Rate of Return
Southwestern Electric Power Co.	07/21	Southwestern Electric Power Co.	Docket No. 21-070-U	Return on Equity
CenterPoint Energy Resources Corp.	05/21	CenterPoint Arkansas Gas	Docket No. 21-004-U	Return on Equity
California Public Utilities Commission				
San Gabriel Valley Water Company	05/23	San Gabriel Valley Water Company	Docket No. A23-05-001	Return on Equity
Colorado Public Utilities Commission				
Atmos Energy Corporation	08/22	Atmos Energy Corporation	Docket No. 22AL-0348G	Rate of Return
Summit Utilities, Inc.	04/18	Colorado Natural Gas Company	Docket No. 18AL-0305G	Rate of Return
Atmos Energy Corporation	06/17	Atmos Energy Corporation	Docket No. 17AL-0429G	Rate of Return
Commission of the Canada Energy Regulator				
Trans-Northern Pipelines Inc.	11/22	Trans-Northern Pipelines Inc.	Docket No. C-22197	Cost of Capital
Delaware Public Service Commission				
Artesian Water Company, Inc.	04/23	Artesian Water Company, Inc.	Docket No. 23-0601	Rate of Return
Delmarva Power & Light Co.	12/22	Delmarva Power & Light Co.	Docket No. 22-0897 (Electric)	Return on Equity
Delmarva Power & Light Co.	01/22	Delmarva Power & Light Co.	Docket No. 22-002 (Gas)	Return on Equity
Delmarva Power & Light Co.	11/20	Delmarva Power & Light Co.	Docket No. 20-0149 (Electric)	Return on Equity
Delmarva Power & Light Co.	10/20	Delmarva Power & Light Co.	Docket No. 20-0150 (Gas)	Return on Equity



Sponsor	Date	Case/Applicant	Docket No.	Subject
Tidewater Utilities, Inc.	11/13	Tidewater Utilities, Inc.	Docket No. 13-466	Capital Structure
Public Service Commission of the District of Columbia				
Washington Gas Light Company	04/22	Washington Gas Light Company	Formal Case No. 1169	Rate of Return
Washington Gas Light Company	09/20	Washington Gas Light Company	Formal Case No. 1162	Rate of Return
Federal Energy Regulatory Commission				
LS Power Grid California, LLC	10/20	LS Power Grid California, LLC	Docket No. ER21-195-000	Rate of Return
Florida Public Service Commission				
Peoples Gas System, Inc.	04/23	Peoples Gas System, Inc.	Docket No. 20230023-GU	Rate of Return
Tampa Electric Company	04/21	Tampa Electric Company	Docket No. 20210034-EI	Return on Equity
Peoples Gas System, Inc.	09/20	Peoples Gas System, Inc.	Docket No. 20200051-GU	Rate of Return
Utilities, Inc. of Florida	06/20	Utilities, Inc. of Florida	Docket No. 20200139-WS	Rate of Return
Hawaii Public Utilities Commission				
Launiupoko Irrigation Company, Inc.	12/20	Launiupoko Irrigation Company, Inc.	Docket No. 2020-0217 / Transferred to 2020-0089	Capital Structure
Lanai Water Company, Inc.	12/19	Lanai Water Company, Inc.	Docket No. 2019-0386	Cost of Service / Rate Design
Manele Water Resources, LLC	08/19	Manele Water Resources, LLC	Docket No. 2019-0311	Cost of Service / Rate Design
Kaupulehu Water Company	02/18	Kaupulehu Water Company	Docket No. 2016-0363	Rate of Return
Aqua Engineers, LLC	05/17	Puhi Sewer & Water Company	Docket No. 2017-0118	Cost of Service / Rate Design
Hawaii Resources, Inc.	09/16	Laie Water Company	Docket No. 2016-0229	Cost of Service / Rate Design
Illinois Commerce Commission				
Aqua Illinois, Inc.	01/24	Aqua Illinois, Inc.	Docket No. 24-0044	Rate of Return
Ameren Illinois Company d/b/a Ameren Illinois	01/23	Ameren Illinois Company d/b/a Ameren Illinois	Docket No. 23-0082 (Electric)	Return on Equity
Ameren Illinois Company d/b/a Ameren Illinois	01/23	Ameren Illinois Company d/b/a Ameren Illinois	Docket No. 23-0067 (Gas)	Return on Equity
Utility Services of Illinois, Inc.	02/21	Utility Services of Illinois, Inc.	Docket No. 21-0198	Rate of Return
Ameren Illinois Company d/b/a Ameren Illinois	07/20	Ameren Illinois Company d/b/a Ameren Illinois	Docket No. 20-0308	Return on Equity
Utility Services of Illinois, Inc.	11/17	Utility Services of Illinois, Inc.	Docket No. 17-1106	Cost of Service / Rate Design
Aqua Illinois, Inc.	04/17	Aqua Illinois, Inc.	Docket No. 17-0259	Rate of Return
Utility Services of Illinois, Inc.	04/15	Utility Services of Illinois, Inc.	Docket No. 14-0741	Rate of Return
Indiana Utility Regulatory Commission				
Aqua Indiana, Inc.	03/16	Aqua Indiana, Inc. Aboite Wastewater Division	Docket No. 44752	Rate of Return
Twin Lakes, Utilities, Inc.	08/13	Twin Lakes, Utilities, Inc.	Docket No. 44388	Rate of Return
Kansas Corporation Commission				
Atmos Energy Corporation	07/19	Atmos Energy Corporation	19-ATMG-525-RTS	Rate of Return
Kentucky Public Service Commission				
Bluegrass Water Utility Operating Company	02/23	Bluegrass Water Utility Operating Company	2022-00432	Return on Equity
Atmos Energy Corporation	07/22	Atmos Energy Corporation	2022-00222	PRP Rider Rate
Water Service Corporation of KY	06/22	Water Service Corporation of KY	2022-00147	Rate of Return
Atmos Energy Corporation	07/21	Atmos Energy Corporation	2021-00304	PRP Rider Rate



Sponsor	Date	Case/Applicant	Docket No.	Subject
Atmos Energy Corporation	06/21	Atmos Energy Corporation	2021-00214	Rate of Return
Duke Energy Kentucky, Inc.	06/21	Duke Energy Kentucky, Inc.	2021-00190	Return on Equity
Bluegrass Water Utility Operating Company	10/20	Bluegrass Water Utility Operating Company	2020-00290	Return on Equity
Louisiana Public Service Commission				
Utilities, Inc. of Louisiana	05/21	Utilities, Inc. of Louisiana	Docket No. U-36003	Rate of Return
Southwestern Electric Power Company	12/20	Southwestern Electric Power Company	Docket No. U-35441	Return on Equity
Atmos Energy Corporation	04/20	Atmos Energy Corporation	Docket No. U-35535	Rate of Return
Louisiana Water Service, Inc.	06/13	Louisiana Water Service, Inc.	Docket No. U-32848	Rate of Return
Maine Public Utilities Commission				
Northern Utilities, Inc. d/b/a Unutil	05/23	Northern Utilities, Inc. d/b/a Unutil	Docket No. 2023-00051	Return on Equity
Summit Natural Gas of Maine, Inc.	03/22	Summit Natural Gas of Maine, Inc.	Docket No. 2022-00025	Rate of Return
The Maine Water Company	09/21	The Maine Water Company	Docket No. 2021-00053	Rate of Return
Maryland Public Service Commission				
Washington Gas Light Company	05/23	Washington Gas Light Company	Case No. 9704	Rate of Return
FirstEnergy Service Company	03/23	Potomac Edison Company	Case No. 9695	Rate of Return
Washington Gas Light Company	08/20	Washington Gas Light Company	Case No. 9651	Rate of Return
FirstEnergy Corporation	08/18	Potomac Edison Company	Case No. 9490	Rate of Return
Massachusetts Department of Public Utilities				
Unitil Corporation	9/23	Fitchburg Gas & Electric Co. (Elec.)	D.P.U. 23-80	Rate of Return
Unitil Corporation	9/23	Fitchburg Gas & Electric Co. (Gas)	D.P.U. 23-81	Rate of Return
Unitil Corporation	12/19	Fitchburg Gas & Electric Co. (Elec.)	D.P.U. 19-130	Rate of Return
Unitil Corporation	12/19	Fitchburg Gas & Electric Co. (Gas)	D.P.U. 19-131	Rate of Return
Liberty Utilities	07/15	Liberty Utilities d/b/a New England Natural Gas Company	D.P.U. 15-75	Rate of Return
Minnesota Public Utilities Commission				
Northern States Power Company	11/01	Northern States Power Company	Docket No. G002/GR-21-678	Return on Equity
Northern States Power Company	10/21	Northern States Power Company	Docket No. E002/GR-21-630	Return on Equity
Northern States Power Company	11/20	Northern States Power Company	Docket No. E002/GR-20-723	Return on Equity
Mississippi Public Service Commission				
Great River Utility Operating Co.	07/22	Great River Utility Operating Co.	Docket No. 2022-UN-86	Rate of Return
Atmos Energy Corporation	03/19	Atmos Energy Corporation	Docket No. 2015-UN-049	Capital Structure
Atmos Energy Corporation	07/18	Atmos Energy Corporation	Docket No. 2015-UN-049	Capital Structure
Missouri Public Service Commission				
Confluence Rivers Utility Operating Company, Inc.	01/23	Confluence Rivers Utility Operating Company, Inc.	Case No. WR-2023-0006/SR-2023-0007	Rate of Return
Spire Missouri, Inc.	12/20	Spire Missouri, Inc.	Case No. GR-2021-0108	Return on Equity
Indian Hills Utility Operating Company, Inc.	10/17	Indian Hills Utility Operating Company, Inc.	Case No. SR-2017-0259	Rate of Return
Raccoon Creek Utility Operating Company, Inc.	09/16	Raccoon Creek Utility Operating Company, Inc.	Case No. SR-2016-0202	Rate of Return
Public Utilities Commission of Nevada				
Southwest Gas Corporation	09/23	Southwest Gas Corporation	Docket No. 23-09012	Return on Equity
Southwest Gas Corporation	09/21	Southwest Gas Corporation	Docket No. 21-09001	Return on Equity
Southwest Gas Corporation	08/20	Southwest Gas Corporation	Docket No. 20-02023	Return on Equity
New Hampshire Public Utilities Commission				



Sponsor	Date	Case/Applicant	Docket No.	Subject
Aquarion Water Company of New Hampshire, Inc.	12/20	Aquarion Water Company of New Hampshire, Inc.	Docket No. DW 20-184	Rate of Return
New Jersey Board of Public Utilities				
New Jersey Natural Gas Company	01/24	New Jersey Natural Gas Company	Docket No. GR24010071	Rate of Return
Middlesex Water Company	05/23	Middlesex Water Company	Docket No. WR23050292	Rate of Return
FirstEnergy Service Company	03/23	Jersey Central Power & Light Co.	Docket No. ER23030144	Rate of Return
Atlantic City Electric Company	02/23	Atlantic City Electric Company	Docket No. ER20120746	Return on Equity
Middlesex Water Company	05/21	Middlesex Water Company	Docket No. WR21050813	Rate of Return
Atlantic City Electric Company	12/20	Atlantic City Electric Company	Docket No. ER20120746	Return on Equity
FirstEnergy Service Company	02/20	Jersey Central Power & Light Co.	Docket No. ER20020146	Rate of Return
Aqua New Jersey, Inc.	12/18	Aqua New Jersey, Inc.	Docket No. WR18121351	Rate of Return
Middlesex Water Company	10/17	Middlesex Water Company	Docket No. WR17101049	Rate of Return
Middlesex Water Company	03/15	Middlesex Water Company	Docket No. WR15030391	Rate of Return
The Atlantic City Sewerage Company	10/14	The Atlantic City Sewerage Company	Docket No. WR14101263	Cost of Service / Rate Design
Middlesex Water Company	11/13	Middlesex Water Company	Docket No. WR1311059	Capital Structure
New Mexico Public Regulation Commission				
New Mexico Gas Company	09/23	New Mexico Gas Company	Case No. 23-00255-UT	Return on Equity
Southwestern Public Service Co.	11/22	Southwestern Public Service Co.	Case No. 22-00286-UT	Return on Equity
Southwestern Public Service Co.	01/21	Southwestern Public Service Co.	Case No. 20-00238-UT	Return on Equity
North Carolina Utilities Commission				
Carolina Water Service, Inc.	07/22	Carolina Water Service, Inc.	Docket No. W-354 Sub 400	Rate of Return
Aqua North Carolina, Inc.	06/22	Aqua North Carolina, Inc.	Docket No. W-218 Sub 573	Rate of Return
Carolina Water Service, Inc.	07/21	Carolina Water Service, Inc.	Docket No. W-354 Sub 384	Rate of Return
Piedmont Natural Gas Co., Inc.	03/21	Piedmont Natural Gas Co., Inc.	Docket No. G-9, Sub 781	Return on Equity
Duke Energy Carolinas, LLC	07/20	Duke Energy Carolinas, LLC	Docket No. E-7, Sub 1214	Return on Equity
Duke Energy Progress, LLC	07/20	Duke Energy Progress, LLC	Docket No. E-2, Sub 1219	Return on Equity
Aqua North Carolina, Inc.	12/19	Aqua North Carolina, Inc.	Docket No. W-218 Sub 526	Rate of Return
Carolina Water Service, Inc.	06/19	Carolina Water Service, Inc.	Docket No. W-354 Sub 364	Rate of Return
Carolina Water Service, Inc.	09/18	Carolina Water Service, Inc.	Docket No. W-354 Sub 360	Rate of Return
Aqua North Carolina, Inc.	07/18	Aqua North Carolina, Inc.	Docket No. W-218 Sub 497	Rate of Return
North Dakota Public Service Commission				
Northern States Power Company	09/21	Northern States Power Company	Case No. PU-21-381	Rate of Return
Northern States Power Company	11/20	Northern States Power Company	Case No. PU-20-441	Rate of Return
Public Utilities Commission of Ohio				
Aqua Ohio, Inc.	11/22	Aqua Ohio, Inc.	Case No. 22-1094-WW-AIR	Rate of Return
Duke Energy Ohio, Inc.	10/21	Duke Energy Ohio, Inc.	Case No. 21-887-EL-AIR	Return on Equity
Aqua Ohio, Inc.	07/21	Aqua Ohio, Inc.	Case No. 21-0595-WW-AIR	Rate of Return
Aqua Ohio, Inc.	05/16	Aqua Ohio, Inc.	Case No. 16-0907-WW-AIR	Rate of Return
Pennsylvania Public Utility Commission				
Columbia Water Company	05/23	Columbia Water Company	Docket No. R-2023-3040258	Rate of Return
Borough of Ambler	06/22	Borough of Ambler – Bureau of Water	Docket No. R-2022-3031704	Rate of Return
Citizens' Electric Company of Lewisburg	05/22	C&T Enterprises	Docket No. R-2022-3032369	Rate of Return
Valley Energy Company	05/22	C&T Enterprises	Docket No. R-2022-3032300	Rate of Return



Sponsor	Date	Case/Applicant	Docket No.	Subject
Community Utilities of Pennsylvania, Inc.	04/21	Community Utilities of Pennsylvania, Inc.	Docket No. R-2021-3025207	Rate of Return
Vicinity Energy Philadelphia, Inc.	04/21	Vicinity Energy Philadelphia, Inc.	Docket No. R-2021-3024060	Rate of Return
Delaware County Regional Water Control Authority	02/20	Delaware County Regional Water Control Authority	Docket No. A-2019-3015173	Valuation
Valley Energy, Inc.	07/19	C&T Enterprises	Docket No. R-2019-3008209	Rate of Return
Wellsboro Electric Company	07/19	C&T Enterprises	Docket No. R-2019-3008208	Rate of Return
Citizens' Electric Company of Lewisburg	07/19	C&T Enterprises	Docket No. R-2019-3008212	Rate of Return
Steelton Borough Authority	01/19	Steelton Borough Authority	Docket No. A-2019-3006880	Valuation
Mahoning Township, PA	08/18	Mahoning Township, PA	Docket No. A-2018-3003519	Valuation
SUEZ Water Pennsylvania Inc.	04/18	SUEZ Water Pennsylvania Inc.	Docket No. R-2018-000834	Rate of Return
Columbia Water Company	09/17	Columbia Water Company	Docket No. R-2017-2598203	Rate of Return
Veolia Energy Philadelphia, Inc.	06/17	Veolia Energy Philadelphia, Inc.	Docket No. R-2017-2593142	Rate of Return
Emporium Water Company	07/14	Emporium Water Company	Docket No. R-2014-2402324	Rate of Return
Columbia Water Company	07/13	Columbia Water Company	Docket No. R-2013-2360798	Rate of Return
Penn Estates Utilities, Inc.	12/11	Penn Estates, Utilities, Inc.	Docket No. R-2011-2255159	Capital Structure / Long-Term Debt Cost Rate
South Carolina Public Service Commission				
Blue Granite Water Co.	12/19	Blue Granite Water Company	Docket No. 2019-292-WS	Rate of Return
Carolina Water Service, Inc.	02/18	Carolina Water Service, Inc.	Docket No. 2017-292-WS	Rate of Return
Carolina Water Service, Inc.	06/15	Carolina Water Service, Inc.	Docket No. 2015-199-WS	Rate of Return
Carolina Water Service, Inc.	11/13	Carolina Water Service, Inc.	Docket No. 2013-275-WS	Rate of Return
United Utility Companies, Inc.	09/13	United Utility Companies, Inc.	Docket No. 2013-199-WS	Rate of Return
Utility Services of South Carolina, Inc.	09/13	Utility Services of South Carolina, Inc.	Docket No. 2013-201-WS	Rate of Return
Tega Cay Water Services, Inc.	11/12	Tega Cay Water Services, Inc.	Docket No. 2012-177-WS	Capital Structure
South Dakota Public Service Commission				
Northern States Power Company	06/22	Northern States Power Company	Docket No. EL22-017	Rate of Return
Tennessee Public Utility Commission				
Piedmont Natural Gas Company	07/20	Piedmont Natural Gas Company	Docket No. 20-00086	Return on Equity
Public Utility Commission of Texas				
Southwestern Public Service Co.	02/23	Southwestern Public Service Co.	Docket No. 54634	Return on Equity
CSWR – Texas Utility Operating Company, LLC	02/23	CSWR – Texas Utility Operating Company, LLC	Docket No. 54565	Rate of Return
Oncor Electric Delivery Co. LLC	05/22	Oncor Electric Delivery Co. LLC	Docket No. 53601	Return on Equity
Southwestern Public Service Co.	02/21	Southwestern Public Service Co.	Docket No. 51802	Return on Equity
Southwestern Electric Power Co.	10/20	Southwestern Electric Power Co.	Docket No. 51415	Rate of Return
Texas Railroad Commission				
Atmos Pipeline – Texas, a Division of Atmos Energy Corporation	05/23	Atmos Pipeline – Texas, a Division of Atmos Energy Corporation	Docket No. OS-23-00013758	Return on Equity
Virginia State Corporation Commission				
Aqua Virginia, Inc.	07/23	Aqua Virginia, Inc.	PUR-2023-00073	Rate of Return
Washington Gas Light Company	06/22	Washington Gas Light Company	PUR-2022-00054	Return on Equity
Virginia Natural Gas, Inc.	04/21	Virginia Natural Gas, Inc.	PUR-2020-00095	Return on Equity
Massanutten Public Service Corporation	12/20	Massanutten Public Service Corporation	PUE-2020-00039	Return on Equity



Sponsor	Date	Case/Applicant	Docket No.	Subject
Aqua Virginia, Inc.	07/20	Aqua Virginia, Inc.	PUR-2020-00106	Rate of Return
WGL Holdings, Inc.	07/18	Washington Gas Light Company	PUR-2018-00080	Rate of Return
Atmos Energy Corporation	05/18	Atmos Energy Corporation	PUR-2018-00014	Rate of Return
Aqua Virginia, Inc.	07/17	Aqua Virginia, Inc.	PUR-2017-00082	Rate of Return
Massanutten Public Service Corp.	08/14	Massanutten Public Service Corp.	PUE-2014-00035	Rate of Return / Rate Design
Public Service Commission of West Virginia				
FirstEnergy Service Company	05/23	Monongahela Power Company and The Potomac Edison Company	Case No. 23-0460-E-42T	Return on Equity
FirstEnergy Service Company	12/21	Monongahela Power Company and The Potomac Edison Company	Case No. 21-0857-E-CN (ELG)	Return on Equity
FirstEnergy Service Company	11/21	Monongahela Power Company and The Potomac Edison Company	Case No. 21-0813-E-P (Solar)	Return on Equity

Tampa Electric Company, Inc.
Brief Summary of Common Equity Cost Rate

Line No.	Principal Methods	Proxy Group of Fourteen Electric Utilities	Proxy Group of Fourteen Electric Utilities (excl. PRPM)
1.	Discounted Cash Flow Model (DCF) (1)	9.89%	9.89%
2.	Risk Premium Model (RPM) (2)	11.47%	11.46%
3.	Capital Asset Pricing Model (CAPM) (3)	12.48%	12.41%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	12.95%	12.89%
5.	Indicated Common Equity Cost Rate before Adjustment for Unique Risk	9.89% - 12.48%	9.89% - 12.41%
6.	Credit Risk Adjustment (5)	-0.08%	-0.08%
7.	Flotation Cost Adjustment (6)	0.10%	0.10%
8.	Indicated Common Equity Cost Rate after Adjustment	9.90% - 12.49%	9.90% - 12.42%
9.	Recommended Common Equity Cost Rate	11.50%	11.50%

- Notes: (1) From page 1 of Document No. 4.
(2) From page 1 of Document No. 5.
(3) From page 1 of Document No. 6.
(4) From page 1 of Document No. 8.
(5) Company-specific risk adjustment to reflect TECO's lower risk due to a greater long-term rating relative to the proxy group as detailed in Mr. D'Ascendis' Direct Testimony.
(6) From page 1 of Document No. 9.

Tampa Electric Company, Inc.
Capitalization and Financial Statistics (1)
2018 - 2022, Inclusive

	2022	2021	2020	2019	2018	
	(MILLIONS OF DOLLARS)					
<u>Capitalization Statistics</u>						
<u>Amount of Capital Employed</u>						
Total Permanent Capital	\$ 7,624.742	\$ 6,900.873	\$ 6,111.880	\$ 5,721.456	\$ 5,152.162	
Short-Term Debt	1,048.003	555.478	560.648	256.861	167.348	
Total Capital Employed	<u>\$ 8,672.744</u>	<u>\$ 7,456.351</u>	<u>\$ 6,672.528</u>	<u>\$ 5,978.317</u>	<u>\$ 5,319.511</u>	
<u>Indicated Average Capital Cost Rates (2)</u>						
Total Debt	3.45 %	3.78 %	3.99 %	4.28 %	4.16 %	
<u>Capital Structure Ratios</u>						
5 YEAR AVERAGE						
Based on Total Permanent Capital:						
Long-Term Debt	41.91 %	41.95 %	41.85 %	44.70 %	44.37 %	42.96 %
Preferred Stock	-	-	-	-	-	-
Common Equity	58.09	58.05	58.15	55.30	55.63	57.04
Total	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
Based on Total Capital:						
Total Debt, Including Short-Term Debt	48.93 %	46.28 %	46.74 %	47.08 %	46.12 %	47.03 %
Preferred Stock	-	-	-	-	-	-
Common Equity	51.07	53.72	53.26	52.92	53.88	52.97
Total	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Dividend Payout Ratio</u>	94.82 %	106.16 %	95.97 %	100.86 %	106.39 %	100.84 %
<u>Rate Of Return On Average Book Common Equity</u>	10.86 %	9.40 %	11.07 %	10.48 %	10.77 %	10.52 %
<u>Total Debt / EBITDA (3)</u>	3.73 x	3.93 x	3.72 x	3.82 x	3.41 x	3.72 x
<u>Funds From Operations / Total Debt (4)</u>	10.86 %	21.15 %	22.33 %	25.69 %	27.02 %	21.41 %
<u>Total Debt / Total Capital</u>	48.93 %	46.28 %	46.74 %	47.08 %	46.12 %	47.03 %

Notes:

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

Source of Information: Company audited financial statements

Proxy Group of Fourteen Electric Utilities
Capitalization and Financial Statistics (1)
2018 - 2022, Inclusive

	2022	2021	2020	2019	2018	
	(MILLIONS OF DOLLARS)					
Capitalization Statistics						
Amount of Capital Employed						
Total Permanent Capital	\$34,914.030	\$32,750.196	\$30,428.258	\$28,342.351	\$26,105.282	
Short-Term Debt	\$1,265.274	\$1,065.456	\$877.056	\$930.357	\$1,010.967	
Total Capital Employed	<u>\$36,179.304</u>	<u>\$33,815.652</u>	<u>\$31,305.314</u>	<u>\$29,272.708</u>	<u>\$27,116.249</u>	
Indicated Average Capital Cost Rates (2)						
Total Debt	3.82 %	3.71 %	4.13 %	4.33 %	4.42 %	
Preferred Stock	5.86 %	7.09 %	5.58 %	5.44 %	5.34 %	
Capital Structure Ratios						
Based on Total Permanent Capital:						
Long-Term Debt	56.90 %	56.46 %	55.23 %	53.38 %	52.59 %	54.91 %
Preferred Stock	0.51	0.56	0.75	0.87	0.87	0.71
Common Equity	42.59	42.98	44.02	45.75	46.55	44.38
Total	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
Based on Total Capital:						
Total Debt, Including Short-Term Debt	58.01 %	57.66 %	56.30 %	54.44 %	53.84 %	56.05 %
Preferred Stock	0.49	0.54	0.71	0.85	0.84	0.69
Common Equity	41.49	41.80	42.99	44.71	45.32	43.26
Total	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
Financial Statistics						
Financial Ratios - Market Based						
Earnings / Price Ratio	5.10 %	5.60 %	4.25 %	5.54 %	4.85 %	5.07 %
Market / Average Book Ratio	189.04	186.74	184.58	195.96	190.03	189.27
Dividend Yield	3.69	3.70	3.72	3.45	3.72	3.66
Dividend Payout Ratio	79.74	70.80	65.48	62.25	50.87	65.83
Rate of Return on Average Book Common Equity	9.31 %	10.18 %	7.94 %	10.65 %	8.58 %	9.33 %
Total Debt / EBITDA (3)	5.44 x	5.27 x	6.00 x	4.55 x	5.27 x	5.31 x
Funds from Operations / Total Debt (4)	10.41 %	5.48 %	12.09 %	13.16 %	18.84 %	11.99 %
Total Debt / Total Capital	58.01 %	57.66 %	56.30 %	54.44 %	53.84 %	56.05 %

Notes:

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

Source of Information: Company Annual Forms 10-K.

Capital Structure Based upon Total Permanent Capital for the
Proxy Group of Fourteen Electric Utilities
2018 - 2022, Inclusive

	<u>2022</u>	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>	<u>5 YEAR AVERAGE</u>
<u>Alliant Energy Corporation</u>						
Long-Term Debt	53.86 %	53.11 %	51.92 %	51.87 %	51.29 %	52.41 %
Short-Term Debt	4.28	3.71	2.98	2.83	4.11	3.58
Preferred Stock	-	-	1.53	1.68	1.86	1.01
Common Equity	<u>41.86</u>	<u>43.18</u>	<u>43.57</u>	<u>43.62</u>	<u>42.74</u>	<u>43.00</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Ameren Corporation</u>						
Long-Term Debt	54.50 %	55.74 %	53.67 %	51.99 %	50.21 %	53.22 %
Short-Term Debt	4.16	2.33	2.37	2.44	3.55	2.97
Preferred Stock	0.50	0.55	0.69	0.79	0.84	0.67
Common Equity	<u>40.84</u>	<u>41.38</u>	<u>43.27</u>	<u>44.78</u>	<u>45.40</u>	<u>43.14</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>American Electric Power Corporation</u>						
Long-Term Debt	55.99 %	57.18 %	57.43 %	54.01 %	52.68 %	55.46 %
Short-Term Debt	6.46	4.47	4.58	5.74	4.31	5.11
Preferred Stock	-	-	-	-	-	-
Common Equity	<u>37.55</u>	<u>38.35</u>	<u>37.99</u>	<u>40.25</u>	<u>43.01</u>	<u>39.43</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Duke Energy Corporation</u>						
Long-Term Debt	57.21 %	54.82 %	54.08 %	53.78 %	53.59 %	54.70 %
Short-Term Debt	3.17	2.84	2.59	2.90	3.35	2.97
Preferred Stock	1.58	1.69	1.77	1.81	-	1.37
Common Equity	<u>38.04</u>	<u>40.65</u>	<u>41.56</u>	<u>41.51</u>	<u>43.06</u>	<u>40.96</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Edison International</u>						
Long-Term Debt	62.80 %	58.16 %	52.97 %	53.34 %	52.39 %	55.93 %
Short-Term Debt	4.27	5.42	6.15	1.60	2.56	4.00
Preferred Stock	4.03	4.38	4.87	6.38	7.81	5.49
Common Equity	<u>28.90</u>	<u>32.04</u>	<u>36.01</u>	<u>38.68</u>	<u>37.24</u>	<u>34.58</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Entergy Corporation</u>						
Long-Term Debt	64.76 %	66.47 %	63.59 %	58.99 %	59.50 %	62.66 %
Short-Term Debt	2.07	3.08	4.63	6.43	7.15	4.67
Preferred Stock	0.79	0.56	0.72	0.84	0.81	0.75
Common Equity	<u>32.38</u>	<u>29.89</u>	<u>31.06</u>	<u>33.74</u>	<u>32.54</u>	<u>31.92</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Evergy, Inc.</u>						
Long-Term Debt	48.89 %	48.22 %	51.60 %	49.27 %	40.17 %	47.63 %
Short-Term Debt	6.29	5.77	1.68	4.82	5.93	4.90
Preferred Stock	-	-	-	-	-	-
Common Equity	<u>44.82</u>	<u>46.01</u>	<u>46.72</u>	<u>45.91</u>	<u>53.90</u>	<u>47.47</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>IDACORP, Inc.</u>						
Long-Term Debt	43.87 %	42.85 %	43.86 %	42.70 %	43.63 %	43.38 %
Short-Term Debt	-	-	-	-	-	-
Preferred Stock	-	-	-	-	-	-
Common Equity	<u>56.13</u>	<u>57.15</u>	<u>56.14</u>	<u>57.30</u>	<u>56.37</u>	<u>56.62</u>
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>

Capital Structure Based upon Total Permanent Capital for the
Proxy Group of Fourteen Electric Utilities
2018 - 2022, Inclusive

	<u>2022</u>	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>2018</u>	<u>5 YEAR AVERAGE</u>
<u>NorthWestern Corporation</u>						
Long-Term Debt	49.56 %	52.09 %	51.54 %	52.27 %	51.98 %	51.49 %
Short-Term Debt	-	-	2.23	-	-	0.44
Preferred Stock	-	-	-	-	-	-
Common Equity	50.44	47.91	46.23	47.73	48.02	48.07
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>OGE Energy Corporation</u>						
Long-Term Debt	50.75 %	49.74 %	48.39 %	42.91 %	44.00 %	47.16 %
Short-Term Debt	-	5.39	1.32	1.50	-	1.64
Preferred Stock	-	-	-	-	-	-
Common Equity	49.25	44.87	50.29	55.59	56.00	51.20
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Pinnacle West Capital Corporation</u>						
Long-Term Debt	54.95 %	53.26 %	52.11 %	50.39 %	49.23 %	51.99 %
Short-Term Debt	2.40	2.20	1.40	1.03	0.73	1.55
Preferred Stock	-	-	-	-	-	-
Common Equity	42.65	44.54	46.49	48.58	50.04	46.46
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Portland General Electric Company</u>						
Long-Term Debt	56.75 %	54.82 %	52.44 %	50.06 %	49.72 %	52.76 %
Short-Term Debt	-	-	2.58	-	-	0.52
Preferred Stock	-	-	-	-	-	-
Common Equity	43.25	45.18	44.98	49.94	50.28	46.72
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Southern Company</u>						
Long-Term Debt	62.46 %	63.84 %	62.72 %	60.01 %	61.14 %	62.03 %
Short-Term Debt	2.97	1.76	0.79	2.75	4.06	2.47
Preferred Stock	-	0.36	0.38	0.39	0.40	0.31
Common Equity	34.57	34.04	36.11	36.85	34.40	35.19
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Xcel Energy Inc.</u>						
Long-Term Debt	57.81 %	57.39 %	56.96 %	56.69 %	55.00 %	56.77 %
Short-Term Debt	1.96	2.58	1.66	1.86	3.52	2.32
Preferred Stock	-	-	-	-	-	-
Common Equity	40.23	40.03	41.38	41.45	41.48	40.91
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Proxy Group of Fourteen Electric Utilities</u>						
Long-Term Debt	55.30 %	54.84 %	53.81 %	52.02 %	51.04 %	53.40 %
Short-Term Debt	2.72	2.83	2.50	2.42	2.81	2.65
Preferred Stock	0.49	0.54	0.71	0.85	0.84	0.69
Common Equity	41.49	41.80	42.99	44.71	45.32	43.26
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>

Source of Information: Annual Forms 10-K.

Tampa Electric Company, Inc.
Operating Subsidiary Company Capital Structures of the
Proxy Group of Fourteen Electric Utilities

Company Name	Parent Company Ticker	2022				
		Common Equity	Preferred Equity	Short-Term Debt	Long-Term Debt	Total Capital
Interstate Power and Light Company	LNT	51.03%	0.00%	0.00%	48.97%	100.00%
Wisconsin Power and Light Company	LNT	53.10%	0.00%	4.41%	42.49%	100.00%
Ameren Illinois Company	AEE	54.31%	0.43%	2.34%	42.91%	100.00%
Union Electric Company	AEE	49.42%	0.62%	2.56%	47.39%	100.00%
AEP Texas Inc.	AEP	39.90%	0.00%	0.99%	59.11%	100.00%
Appalachian Power Company	AEP	46.62%	0.00%	1.71%	51.67%	100.00%
Indiana Michigan Power Company	AEP	45.46%	0.00%	3.78%	50.77%	100.00%
Kentucky Power Company	AEP	41.94%	0.00%	4.30%	53.75%	100.00%
Kingsport Power Company	AEP	NA	NA	NA	NA	NA
Ohio Power Company	AEP	48.83%	0.00%	2.73%	48.43%	100.00%
Public Service Company of Oklahoma	AEP	50.20%	0.00%	7.56%	42.25%	100.00%
Southwestern Electric Power Company	AEP	48.68%	0.00%	4.12%	47.20%	100.00%
Wheeling Power Company	AEP	NA	NA	NA	NA	0.00%
Duke Energy Carolinas, LLC	DUK	49.75%	0.00%	3.97%	46.28%	100.00%
Duke Energy Florida, LLC	DUK	46.05%	0.00%	3.09%	50.86%	100.00%
Duke Energy Indiana, LLC	DUK	49.53%	0.00%	4.58%	45.89%	100.00%
Duke Energy Kentucky, Inc.	DUK	50.33%	0.00%	4.64%	45.03%	100.00%
Duke Energy Ohio, Inc.	DUK	55.90%	0.00%	5.83%	38.27%	100.00%
Duke Energy Progress, LLC	DUK	46.82%	0.00%	1.08%	52.10%	100.00%
Southern California Edison Company	EIX	38.14%	3.94%	1.87%	56.05%	100.00%
Entergy Arkansas, LLC	ETR	46.98%	0.00%	0.00%	53.02%	100.00%
Entergy Louisiana, LLC	ETR	46.78%	0.00%	0.00%	53.22%	100.00%
Entergy Mississippi, LLC	ETR	46.29%	0.00%	0.00%	53.71%	100.00%
Entergy New Orleans, LLC	ETR	47.21%	0.00%	0.00%	52.79%	100.00%
Entergy Texas, Inc.	ETR	47.15%	0.69%	0.00%	52.16%	100.00%
Evergy Kansas Central, Inc.	EVRG	47.56%	0.00%	10.12%	42.32%	100.00%
Evergy Kansas South, Inc.	EVRG	NA	NA	NA	NA	NA
Evergy Metro, Inc.	EVRG	49.76%	0.00%	3.67%	46.57%	100.00%
Evergy Missouri West, Inc.	EVRG	NA	NA	NA	NA	NA
Westar Energy (KPL)	EVRG	NA	NA	NA	NA	NA
Idaho Power Company	IDA	54.53%	0.00%	0.00%	45.47%	100.00%
NorthWestern Corporation	NWE	50.32%	0.00%	0.00%	49.68%	100.00%
Oklahoma Gas and Electric Company	OGE	55.57%	0.00%	0.00%	44.43%	100.00%
Arizona Public Service Company	PNW	46.91%	0.00%	2.20%	50.90%	100.00%
Portland General Electric Company	POR	41.10%	0.00%	0.00%	58.90%	100.00%
Alabama Power Company	SO	52.19%	0.00%	0.00%	47.81%	100.00%
Georgia Power Company	SO	51.85%	0.00%	4.40%	43.75%	100.00%
Mississippi Power Company	SO	55.41%	0.00%	0.00%	44.59%	100.00%
Northern States Power Company	XEL	51.09%	0.00%	1.35%	47.57%	100.00%
Northern States Power Company	XEL	52.63%	0.00%	1.96%	45.40%	100.00%
Public Service Company of Colorado	XEL	54.42%	0.00%	1.73%	43.84%	100.00%
Southwestern Public Service Company	XEL	51.14%	0.00%	0.45%	48.41%	100.00%
Average		<u>49.05%</u>	<u>0.15%</u>	<u>2.31%</u>	<u>48.49%</u>	
Minimum		<u>38.14%</u>	<u>0.00%</u>	<u>0.00%</u>	<u>38.27%</u>	
Maximum		<u>55.90%</u>	<u>3.94%</u>	<u>10.12%</u>	<u>59.11%</u>	

Source: S&P Global Market Intelligence.

Tampa Electric Company, Inc.
Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the
Utility Proxy Group

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
<u>Proxy Group of Fourteen Electric Utilities</u>	<u>Average Dividend Yield (1)</u>	<u>Value Line Projected Five Year Growth in EPS (2)</u>	<u>Zack's Five Year Projected Growth Rate in EPS</u>	<u>Yahoo! Finance Projected Five Year Growth in EPS</u>	<u>Average Projected Five Year Growth in EPS (3)</u>	<u>Adjusted Dividend Yield (4)</u>	<u>Indicated Common Equity Cost Rate (5)</u>
Alliant Energy Corporation	3.62 %	6.50 %	6.30 %	6.65 %	6.48 %	3.74 %	10.22 %
Ameren Corporation	3.30	6.50	6.20	5.40	6.03	3.40	9.43
American Electric Power Corporation	4.52	6.50	4.80	3.70	5.00	4.63	9.63
Duke Energy Corporation	4.50	5.00	6.10	6.70	5.93	4.63	10.56
Edison International	4.73	4.50	3.70	4.85	4.35	4.83	9.18
Entergy Corporation	4.61	0.50	6.40	11.00	5.97	4.75	10.72
Energy, Inc.	5.10	7.50	4.30	2.50	4.77	5.22	9.99
IDACORP, Inc.	3.42	4.00	4.10	3.70	3.93	3.49	7.42 (6)
NorthWestern Corporation	5.12	3.50	5.20	4.08	4.26	5.23	9.49
OGE Energy Corporation	4.83	6.50	3.70	(12.34)	5.10	4.95	10.05
Pinnacle West Capital Corporation	4.78	2.50	5.90	5.90	4.77	4.89	9.66
Portland General Electric Company	4.57	5.00	6.00	4.60	5.20	4.69	9.89
Southern Company	4.06	6.50	4.00	7.10	5.87	4.18	10.05
Xcel Energy Inc.	3.45	6.00	6.00	6.30	6.10	3.56	9.66
						<u>Average</u>	<u>9.89 %</u>
						<u>Median</u>	<u>9.89 %</u>
						<u>Average of Mean and Median</u>	<u>9.89 %</u>

Notes:

- (1) Indicated dividend at 12/29/2023 divided by the average closing price of the last 60 trading days ending 12/29/2023 for each company.
- (2) From pages 2 through 15 of this Document
- (3) Average of columns 2 through 4 excluding negative growth rates.
- (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 5) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for Alliant Energy Corporation, $3.62\% \times (1 + (1/2 \times 6.48\%)) = 3.74\%$.
- (5) Column 5 + Column 6.
- (6) Results were excluded from the final average and median as they were more than two standard deviations from the proxy group's mean.

Source of Information: Value Line Investment Survey.
www.zacks.com, Downloaded on 12/29/2023.
www.yahoo.com, Downloaded on 12/29/2023.

AMEREN NYSE-AEE				RECENT PRICE	77.46	P/E RATIO	17.0	Trailing: 17.6 Median: 20.0	RELATIVE P/E RATIO	1.05	DIV'D YLD	3.3%	VALUE LINE
TIMELINESS 3	Raised 12/8/23	High: 35.3	37.3	48.1	46.8	54.1	64.9	70.9	80.9	87.7	90.8	91.2	Target Price Range 2026 2027 2028
SAFETY 1	Raised 9/10/21	Low: 28.4	30.6	35.2	37.3	41.5	51.4	51.9	63.1	58.7	69.8	73.3	
TECHNICAL 3	Raised 12/1/23	LEGENDS --- 35.70 x Dividends p sh - - - Relative Price Strength Options: Yes Shaded area indicates recession											
BETA .90	(1.00 = Market)	18-Month Target Price Range Low-High Midpoint (% to Mid) \$68-\$120 \$94 (20%)											
2026-28 PROJECTIONS High Price Gain Ann'l Total Low 120 100 (+55%) 14% 100 (+30%) 10%													
Institutional Decisions 4Q2022 1Q2023 2Q2023 to Buy 326 296 289 to Sell 270 268 287 Held(000) 206602 205221 204708 Percent shares traded 30 20 10													
MARKET CAP: \$20.4 billion (Large Cap)													
ELECTRIC OPERATING STATISTICS 2020 2021 2022 % Change Retail Sales (KWH) -3.5 -5.6 +2.1 Avg. Indust. Use (MWh) NA NA NA Avg. Indust. Revs. per KWH (¢) NA NA NA Capacity at Peak (Mw) NA NA NA Peak Load, Summer (Mw) NA NA NA Annual Load Factor (%) NA NA NA % Change Customers (yr-end) NA NA NA Fixed Charge Cov. (%) 307 291 325													
ANNUAL RATES Past Past Est'd '20-'22 of change (per sh) 10 Yrs. 5 Yrs. to '26-'28 Revenues -1.5% .5% 4.0% "Cash Flow" 4.0% 6.5% 5.5% Earnings 4.0% 8.0% 6.5% Dividends 3.5% 5.0% 6.5% Book Value 2.0% 5.5% 6.5%													
QUARTERLY REVENUES (\$ mill.) Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2020 1440 1398 1628 1328 5794 2021 1566 1472 1811 1545 6394 2022 1879 1726 2306 2046 7957 2023 2062 1760 2060 2118 8000 2024 2120 1800 2450 2130 8500													
EARNINGS PER SHARE A Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2020 .59 .98 1.47 .46 3.50 2021 .91 .80 1.65 .48 3.84 2022 .97 .80 1.74 .63 4.14 2023 1.00 .90 1.87 .63 4.40 2024 1.03 .90 2.00 .77 4.70													
QUARTERLY DIVIDENDS PAID B Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2019 .475 .475 .475 .495 1.92 2020 .495 .495 .495 .515 2.00 2021 .55 .55 .55 .55 2.20 2022 .59 .59 .59 .59 2.36 2023 .63 .63 .63 .63													
MARKET CAP: \$20.4 billion (Large Cap)													
CAPITAL STRUCTURE as of 9/30/23 Total Debt \$16018 mill. Due in 5 Yrs \$2789 mill. LT Debt \$13829 mill. LT Interest \$450 mill. (LT interest earned: 3.8x) Pension Assets-12/22 \$5745 mill. Oblig \$5457 mill. Pfd Stock \$129 mill. Pfd Div'd \$5 mill. 807,595 sh. \$3.50 to \$5.50 cum. (no par), \$100 stated val., redeem. \$102.176-\$110/sh.; 487,508 sh. 4.00% to 5.16%, \$100 par, redeem. \$100-\$104.30/sh. Common Stock 262,945,048 shs. as of 10/31/23													
MARKET CAP: \$20.4 billion (Large Cap)													
BUSINESS: Ameren Corporation is a holding company formed through the merger of Union Electric and CIPSCO. Has 1.2 million electric and 127,000 gas customers in Missouri; 1.2 million electric and 813,000 gas customers in Illinois. Discontinued nonregulated power-generation operation in '13. Electric revenue breakdown: residential, 49%; commercial, 34%; industrial, 8%; other, 9%. Generating sources: coal, 73%; nuclear, 11%; hydro & other, 9%; purchased, 7%. Fuel costs: 25% of revenues. Has approximately 9,250 employees. Chairman: Warner L. Baxter. President & CEO: Martin J. Lyons, Jr. Inc.: Missouri. Address: One Ameren Plaza, 1901 Chouteau Ave., P.O. Box 66149, St. Louis, MO 63166-6149. Tel.: 314-621-3222. Internet: www.ameren.com.													
Ameren posted solid results for the September quarter. Earnings per share of \$1.87 were \$0.04 higher than our estimate and \$0.13 above the year-ago tally. Most of the outperformance was due to increased investments in infrastructure across all business segments and lower tax expenses. Too, earnings at Ameren Missouri, the largest segment, continue to benefit from higher electric service rates, and we look for this to remain a main catalyst to the bottom line in the next couple of years.													
The utility's guidance has improved a bit. Due to the aforementioned tailwinds and strong bottom-line performances of late, management narrowed its 2023 earnings estimate to a range of \$4.30 to \$4.45 per share. This compares to the initial guidance range of \$4.25 to \$4.45 per share. The company also updated its five-year plan, which includes a 6% to 8% compounded annual growth rate for earnings from 2023 through 2027. Our 2023 and 2024 bottom-line projections are staying put at \$4.40 and \$4.70 per share, respectively. Profit growth should be primarily driven by increased infrastructure invest-													
ment and strong rate base growth. Ameren remains active on the regulatory front. There was a constructive settlement of the Ameren Missouri Electric rate review, and new rates recently went into effect. The agreement calls for a 2% increase in residential customer rates, compounded annually since April 2017. AEE also has a rate case ongoing for its Illinois electric segment, and received a lower-than-expected proposed order from the commission. In December, the company filed briefs detailing concerns with the return on equity in the proposed electric order. A final order is expected in mid-December.													
This issue is best suited for conservative income-oriented investors. The dividend yield of 3.3% is about average for a utility, which is one of the highest dividend-paying industries in the market. Meanwhile, capital appreciation potential over the 18-month and 3- to 5-year time frames is solid compared to most of its peers. Lastly, these shares are ranked to track the broader market averages in the coming year.													
Zachary J. Hodgkinson December 8, 2023													
(A) Diluted EPS. Excl. nonrec. gain (losses): '10, (\$2.19); '11, (32¢); '12, (\$6.42); '17, (63¢); gain (loss) from discontinued ops.: '13, (92¢); '15, 21¢. Next earnings report due mid-February.				(B) Div'ds paid late Mar., June, Sept., & Dec. ■ Div'd reinvest. plan avail. (C) Incl. intang. In '21: \$6.60/sh. (D) In mill. (E) Rate base: Orig. cost depr. Rate allowed on				com. eq. in MO in '22: elec. & gas, none specified; in IL: electric, varies; in '21: gas, 9.67%; earned on avg. com. eq., '21: 10.6%.				Company's Financial Strength A Stock's Price Stability 95 Price Growth Persistence 80 Earnings Predictability 100	
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AMERICAN ELEC. PWR. NDQ-AEP RECENT PRICE 78.54 P/E RATIO 13.8 (Trailing: 16.3; Median: 18.0) RELATIVE P/E RATIO 0.85 DIV'D YLD 4.5% VALUE LINE

TIMELINESS 3 Raised 11/24/23 SAFETY 1 Raised 3/17/17 TECHNICAL 4 Raised 12/1/23 BETA .80 (1.00 = Market)

18-Month Target Price Range Low-High \$67-\$123 Midpoint (% to Mid) \$95 (20%)

2026-28 PROJECTIONS High Price 135 (+70%) Gain (+40%) Ann'l Return 17% Total 12% Low Price 110 (+40%)

Institutional Decisions 4Q2022 1Q2023 2Q2023 to Buy 707 635 596 to Sell 496 532 572 Hd's(000) 390225 381232 386016 Percent traded 24 shares 16 8

CAPITAL STRUCTURE as of 9/30/23 Total Debt \$42220 mill. Due in 5 Yrs \$12886 mill. LT Debt \$36716 mill. LT Interest \$1400 mill.

Leases, Uncapitalized Annual rentals \$119.6 mill.

Pfd Stock None Common Stock 525,875,633 shs. MARKET CAP: \$41.3 billion (Large Cap)

ELECTRIC OPERATING STATISTICS % Change Retail Sales (KWH) NA NA NA Avg. Indust. Use (MWh) NA NA NA Avg. Indust. Revs. per KWH (¢) NA NA NA Capacity at Peak (Mw) NA NA NA Peak Load (Mw) NA NA NA Annual Load Factor (%) NA NA NA % Change Customers (yr-end) +1.0 NA NA

Fixed Charge Cov. (%) 243 272 285

ANNUAL RATES Past 10 Yrs. Past 5 Yrs. Est'd '20-'22 to '26-'28

Revenues .5% - .5% 3.0% "Cash Flow" 5.0% 5.5% 5.5% Earnings 5.0% 4.0% 6.5% Dividends 5.0% 5.0% 5.5% Book Value 3.5% 3.5% 6.0%

QUARTERLY REVENUES (\$ mill.) E Full Year

QUARTERLY DIVIDENDS PAID P=↑ Full Year

2019 .67 .67 .67 .70 2.71 2020 .70 .70 .70 .74 2.84 2021 .74 .74 .74 .78 3.00 2022 .78 .78 .78 .83 3.17 2023 .83 .83 .83 .88

(A) Diluted EPS. Excl. nonrec. gains (losses); '07, (20c); '08, 40c; '10, (7c); '11, 89c; '12, (38c); '13, (14c); '16, (\$2.99); '17, 26c; '19, (20c); gains (loss) from disc. ops.; '06, 2c; '08, 3c; '15, 58c; '16, (1c); '22, (58c); '23, (34c). invest. plan avail. (C) Incl. intang. In '22: \$52.5 million (D) In mill. (E) Rev. may not sum due to rounding.

(B) Div'ds paid early Mar., June, Sept., & Dec. (C) Div'd reinvestment plan avail. † Shareholder

Company's Financial Strength A+ Stock's Price Stability 100 Price Growth Persistence 55 Earnings Predictability 95

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EDISON INTERNAT'L NYSE-EIX										RECENT PRICE	62.53	P/E RATIO	13.0	(Trailing: 13.2) Median: 14.0)	RELATIVE P/E RATIO	0.81	DIV'D YLD	5.0%	VALUE LINE																																				
TIMELINESS	3	Lowered 7/7/23	High: 48.0	54.2	68.7	69.6	78.7	83.4	71.0	76.4	78.9	68.6	73.3	74.9	Target Price Range		2026	2027	2028																																				
SAFETY	3	Lowered 11/23/18	Low: 39.6	44.3	44.7	55.2	58.0	62.7	45.5	53.4	43.6	53.9	54.4	58.8																																									
TECHNICAL	2	Lowered 10/20/23	LEGENDS --- 26.3 x Dividends p sh - - - - Relative Price Strength Options: Yes Shaded area indicates recession																																																				
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CAPITAL STRUCTURE as of 6/30/23			Total Debt \$33480 mill. Due in 5 Yrs \$9685 mill. LT Debt \$29430 mill. LT Interest \$1400 mill. (Total Interest Coverage: 2.9x) Leases, Uncapitalized Annual rentals \$542 mill.																																																				
Pension Assets-12/22 \$3462 mill.			Oblig \$3524 mill.																																																				
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BUSINESS: Edison International is a holding company for Southern California Edison Company (SoCal Edison), which supplies electricity to 5.2 mill. customers in a 50,000-sq.-mi. area in central, coastal, & southern CA (excl. Los Angeles & San Diego). Edison Energy is an energy svcs. co. Disc. Edison Mission Energy (independent power producer) in '12. Elec. rev. breakdown: residential, 40%; commercial, 42%; industrial, 3%; other, 15%. Generating sources: nuclear, 9%; gas, 7%; hydroelectric, 4%; purchased, 80%. Power costs: 37% of revs. '22 reported depr. rate: 3.8%. Employs 13,385. Chairman: William P. Sullivan. President & CEO: Pedro J. Pizzaro. Inc.: CA. Address: 2244 Walnut Grove Ave., P.O. Box 976, Rosemead, CA 91770. Tel.: 626-302-2222. Web: www.edison.com.																																																							
Edison International is on target for a solid 2023 campaign and operational momentum through next year. The utility posted good first-half profit comparisons that should enable it to surpass the midpoint of this year's internal share-earnings projection of \$4.55 to \$4.85. The escalation mechanism set forth in the 2021 General Rate Case (GRC) decision that allows the company to bill for certain types of expenses, thereby circumventing regulatory lag, is a big plus. Higher interest expense remains problematic, but there are enough tailwinds to more than offset the challenging rate environment. Load growth in California is brisk at around 3% due in part to the ongoing shift to electric vehicles and heavy equipment. Leadership remains confident in its expectation of 5%-7% profit growth through at least 2025, with a path to \$7 per share by 2028. The state's aggressive green energy initiatives and ongoing fire mitigation work should deliver economic returns on invested capital. As always, rate relief by way of the regulatory umbrella will be a key factor. In that vein, the company filed its latest GRC a few months ago.			Although Edison has worked to lower its wildfire risks, they're still problematic. Orange County recently filed a lawsuit alleging EIX's utility, SoCal Edison, acted negligently in maintaining and operating its equipment, causing two wildfires that burned thousands of acres. The blazes in question took place in October, 2020 and May, 2022. Dollar amounts sought weren't given. In recent years, EIX has paid out billions of dollars in lawsuit settlements associated with the role its power lines played in the disastrous late 2017 to 2018 forest fires in the Golden State. While we now exclude the charges from our earnings presentation (beginning from 2019), to better highlight the progress that EIX is making in its core operations, one can see the impact on the balance sheet via the rising debt as a percentage of total capital in the financial array. These shares are neutrally ranked for year-ahead relative performance. Despite the many good things taking place in EIX's service area, wildfire risks, though likely less catastrophic now than in the past, are still financially material.																																																				
(A) Adjusted (non-GAAP) EPS from 2019 on. Excl. gains/(losses): nonrecurs'; '10, 54c; '11, (\$3.33); '13, (\$1.12); '15, (\$1.18); '17, (\$1.37); '18, (14c); '19, (92c); '20, (\$2.54); '21, (\$2.59); '22, (\$3.02); 1Q '23, (28c); disc. ops.: '13, 11c; '14, 57c; '15, 11c; '18, 10c. Qtrly. EPS may not sum due to rounding. Next egs. report due early Nov. (B) Div'd paid late Jan., Apr., July, & Oct. Div'd reinv. plan avail. (C) Incl. def'd chgs. In '22: \$2.49/sh. (D) In mill. (E) Rate base: net orig. cost. Rate all'd on com. eq. in '20: 10.3%; Regulatory Climate: Average.			Company's Financial Strength B++ Stock's Price Stability 80 Price Growth Persistence 35 Earnings Predictability 10																																																				

IDACORP, INC. NYSE:IDA				RECENT PRICE	P/E RATIO	Trailing: 17.9 Median: 20.0	RELATIVE P/E RATIO	DIV'D YLD	VALUE LINE														
TIMELINESS	4	Lowered 8/18/23	High: 45.7 Low: 38.2	54.7 43.1	70.1 50.2	70.5 55.4	83.4 65.0	100.0 77.5	102.4 79.6	114.0 89.3	113.6 69.1	113.8 85.3	118.9 93.5	113.0 88.1	Target Price Range 2026 2027 2028								
SAFETY	1	Raised 1/22/21	LEGENDS --- 30.3 x Dividends p sh - - - Relative Price Strength Options: Yes Shaded area indicates recession																				
TECHNICAL	5	Lowered 9/29/23	18-Month Target Price Range Low-High Midpoint (% to Mid) \$83-\$137 \$110 (15%)																				
BETA	.85	(1.00 = Market)	2026-28 PROJECTIONS Ann'l Total Return High Price Gain Low 105 125 (+30%) 10% 105 105 (+10%) 6%																				
Institutional Decisions				% TOT. RETURN 9/23 THIS STOCK VL ARITH. 1 yr. -2.5 16.6 3 yr. 27.9 43.6 5 yr. 7.9 37.1																			
CAPITAL STRUCTURE as of 6/30/23				© VALUE LINE PUB. LLC																			
Total Debt \$2605.6 mill. Due in 5 Yrs \$335.0 mill. LT Debt \$2482.4 mill. LT Interest \$110.0 mill. (Total Interest Coverage: 4.0x)				2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024																			
Pension Assets-12/22 \$839.7 mill. Oblig \$953.8 mill.				19.51	20.47	21.92	20.97	20.55	21.55	24.81	25.51	25.23	25.04	26.76	27.19	26.70	26.77	28.86	32.51	32.85	34.00	Revenues per sh	36.50
Pfd Stock None				4.11	4.27	5.07	5.35	5.84	5.93	6.29	6.58	6.70	6.86	7.50	7.85	8.07	8.19	8.41	8.55	8.80	9.30	"Cash Flow" per sh	10.60
Common Stock 50,614,789 shs. as of 7/28/23				1.86	2.18	2.64	2.95	3.36	3.37	3.64	3.85	3.87	3.94	4.21	4.49	4.61	4.69	4.85	5.11	5.15	5.40	Earnings per sh A	6.10
MARKET CAP: \$4.9 billion (Mid Cap)				1.20	1.20	1.20	1.20	1.20	1.37	1.57	1.76	1.92	2.08	2.24	2.40	2.56	2.72	2.88	3.04	3.20	3.40	Div'd Decl'd per sh B = †	4.15
ELECTRIC OPERATING STATISTICS				6.39	5.19	5.26	6.85	6.76	4.78	4.68	5.45	5.84	5.89	5.66	5.51	5.53	6.16	5.94	8.56	14.00	16.00	Cap'l Spending per sh	11.00
ANNUAL RATES				26.79	27.76	29.17	31.01	33.19	35.07	36.84	38.85	40.88	42.74	44.65	47.01	48.88	50.73	52.82	55.52	56.85	59.25	Book Value per sh C	66.00
Fixed Charge Cov. (%)				45.06	46.92	47.90	49.41	49.95	50.16	50.23	50.27	50.34	50.40	50.42	50.42	50.42	50.46	50.52	50.56	51.00	51.50	Common Shs Outst'g D	53.00
Past 10 Yrs				18.2	13.9	10.2	11.8	11.5	12.4	13.4	14.7	16.2	19.1	20.6	20.5	22.3	19.9	20.8	21.0	1.12	1.21	Avg Ann'l P/E Ratio	19.0
Past 5 Yrs				.97	.84	.68	.75	.72	.79	.75	.77	.82	1.00	1.04	1.11	1.19	1.02	1.12	1.21	1.12	1.21	Relative P/E Ratio	1.05
Est'd '20-'22				3.5%	4.0%	4.5%	3.4%	3.1%	3.3%	3.2%	3.1%	3.1%	2.8%	2.6%	2.6%	2.5%	2.9%	2.9%	2.8%	2.9%	2.8%	Avg Ann'l Div'd Yield	3.6%
Past 26-'28				BUSINESS: IDACORP, Inc. is a holding company for Idaho Power Company, a regulated electric utility that serves 618,000 customers throughout a 24,000-square-mile area in southern Idaho and eastern Oregon (population: 1.4 million). Most of the company's revenues are derived from the Idaho portion of its service area. Revenue breakdown: residential, 38%; commercial, 27%; industrial, 22%; irrigation, 12%; other, 1%. Generating sources: hydro, 29%; coal, 20%; gas, 13%; purchased, 39%. Fuel costs: 40% of revenues. '22 reported depreciation rate: 3.0%. Has 2,077 employees. Chairman: Richard J. Dahl. President & CEO: Lisa Grow. Incorporated: Idaho. Address: 1221 W. Idaho St., Boise, Idaho 83702. Telephone: 208-388-2200. Internet: www.idacorpinc.com.																			
Revenues				IDACORP's string of annual earnings gains could be in jeopardy. Customer growth fueled impressive showings in the first half of this year, and favorable adjustments tied to grid modernization and expansion pitched in, as well. Leadership has repeated its earnings outlook of \$4.95 to \$5.15 per share, and stated that Idaho Power will use approximately \$15 million of additional tax credits available under its Idaho earnings support regulatory mechanism in 2023. As far as our estimate, we are holding tight at \$5.15 a share, which would represent earnings growth of about three-quarters of a percentage point. Of course, this would extend the annual growth streak to 16 years, but we do have some concerns. Most notably, a rising debt burden that has been facilitating both clean-energy maneuvers and huge infrastructure buildouts. The added interest expense could chip away at the small margin of growth we foresee right now.																			
"Cash Flow"				Our \$5.40-a-share earnings estimate for 2024 factors in some higher rates. The company's last filing of a general rate case was just over 12 years ago (in 2011). All the while, the population in its service area has jumped considerably, and customer growth has been the byproduct of this wave. Idaho, in particular, is past due for an increase in electric delivery rates. Management is poised to follow suit in the state of Oregon, though little information on the timing front has been provided as this report heads to press. The \$5.40 figure represents 5% year-over-year growth, roughly in line with in-house expectations. IDACORP's top-quality stock is not all that appealing at this juncture. Despite a 10% drop in price over the last 90 days, IDA's stock is an untimely choice (4: Below Average). Also, capital appreciation potential three to five years hence is below the Value Line median. The lower price has pumped up the yield a bit, and a 5% increase to \$0.83 a quarter starting with the November payout was a welcome sign, but there are better options available within our utilities coverage. Make no mistake, the company's impressive finances and track record warrant the stock a premium valuation versus its peers. We simply think our subscribers should await a more favorable entry point.																			
Earnings				Erik M. Manning October 20, 2023																			
Dividends				Rate allowed on common equity in '12: 10% (imputed); Regulatory Climate: Above Average.																			
Book Value				Company's Financial Strength A+ Stock's Price Stability 100 Price Growth Persistence 70 Earnings Predictability 100																			
Full Year				(A) Diluted EPS. Earnings may not sum due to rounding. Next earnings report due early November. (B) Dividends historically paid in late February, May, August, and November. (C) Dividend reinvestment plan available. (D) Shareholder investment plan available. (E) Incl. intangibles. In '22: \$1421.9 mill., \$28.12/sh. (F) In millions. (G) Rate base: Net original cost.																			

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NORTHWESTERN NDQ-NWE				RECENT PRICE	49.39	P/E RATIO	14.3	Trailing: 16.2 Median: 17.0	RELATIVE P/E RATIO	0.89	DIV'D YLD	5.2%	VALUE LINE		
TIMELINESS	4	Raised 10/13/23	High: 38.0 Low: 33.0	47.2 35.1	58.7 42.6	59.7 48.4	63.8 52.2	64.5 55.7	65.7 50.0	76.7 57.3	80.5 45.1	70.8 53.2	63.1 48.7	61.2 46.0	Target Price Range 2026 2027 2028
SAFETY	2	Raised 7/27/18	LEGENDS ■ 23.8 x Dividends p sh ···· Relative Price Strength Options: Yes Shaded area indicates recession												
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BETA	.95	(1.00 = Market)	2026-28 PROJECTIONS High Low Price Gain Ann'l Total Return 75 55 (+50%) 15% 55 55 (+10%) 8%												
Institutional Decisions				4Q2022 1Q2023 2Q2023 to Buy 169 135 157 to Sell 115 123 113 Hid's(000) 57154 58097 58238 Percent shares traded 30 20 10											
CAPITAL STRUCTURE as of 6/30/23				2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 Total Debt \$2668.5 mill. Due in 5 Yrs \$1111.4 mill. LT Debt \$2565.4 mill. LT Interest \$102.0 mill. Incl. \$7.2 mill. finance leases. (Total Interest Coverage: 2.5x) Pension Assets-12/22 \$441.5 mill. Oblig \$521.8 mill. Pfd Stock None Common Stock 60,041,809 shs. as of 7/21/23 MARKET CAP: \$3.0 billion (Mid Cap)											
ELECTRIC OPERATING STATISTICS				2020 2021 2022 % Change Retail Sales (KWH) -4.4 +7 +3.7 Avg. Indust. Use (MWH) 33526 31792 34079 Avg. Indust. Revs. per KWH (c) NA NA NA Capacity at Peak (Mw) NA NA NA Peak Load, Winter (Mw) NA NA 2073 Annual Load Factor (%) NA NA NA % Change Customers (yr-end) +1.2 +1.6 +1.5 Fixed Charge Cov. (%) 247 245 219											
ANNUAL RATES				Past 10 Yrs. Past 5 Yrs. Est'd '20-'22 to '26-'28 Revenues -2.0% -1.0% 2.5% "Cash Flow" 3.0% 1.0% 3.5% Earnings 3.5% 1.0% 3.5% Dividends 5.5% 4.0% 2.0% Book Value 6.0% 4.5% 3.5%											
QUARTERLY REVENUES (\$ mill.)				Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2020 335.3 269.4 280.6 313.4 1198.7 2021 400.8 298.2 326.0 347.3 1372.3 2022 394.5 323.0 335.1 425.2 1477.8 2023 454.5 290.5 325 430 1500 2024 455 340 365 440 1600											
EARNINGS PER SHARE A				Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2020 1.00 .43 .58 1.21 3.21 2021 1.24 .59 .70 .97 3.50 2022 1.08 .58 .47 1.16 3.29 2023 1.10 .32 .88 1.15 3.45 2024 1.10 .50 .85 1.15 3.60											
QUARTERLY DIVIDENDS PAID B=†				Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year 2019 .575 .575 .575 .575 2.30 2020 .60 .60 .60 .60 2.40 2021 .62 .62 .62 .62 2.48 2022 .63 .63 .63 .63 2.52 2023 .64 .64 .64											
REGULATORY MATTERS				Regulators are dragging their feet on approving NorthWestern's settlement agreement for new electric and natural gas rates. To recap: in early April, the utility worked out an acceptable consensus with the Montana Consumer Counsel, the Montana Large Customer Group, and Walmart, Inc. The settlement has been submitted to the Montana Public Service Commission (MPSC) for the regulatory body's consideration. The MPSC has already granted interim rate hikes, starting from last October, to allow the company to begin the recoupment of some elevated spending. The agreed to base rates would increase annual electric and natural gas revenues by \$67.4 million and \$14.1 million, respectively. Those levels are predicated on the same authorized returns on equity, namely 9.65% for electric and 9.55% for gas, that were last agreed upon in 2015 and 2017. If the MPSC signs off on the agreement, the utility will have gotten about two-thirds of what it originally filed for in its general rate case. Importantly, NorthWestern would also receive pricing mechanisms geared towards reducing regulatory lag.											
BUSINESS				NorthWestern Corporation (doing business as NorthWestern Energy) supplies electricity & gas in the Upper Midwest and Northwest, serving 463,000 electric customers in Montana and South Dakota and 301,000 gas customers in Montana, South Dakota, and Nebraska. Electric revenue breakdown: residential, 45%; commercial, 46%; industrial, 5%; other, 4%. Generating sources: coal, 28%; hydro, 26%; wind, 6%; natural gas, 6%; purchased power, 34%. Fuel costs: 33% of revenues. 2022 reported depreciation rate: 2.8%. Has approximately 1,500 employees. Board Chair: Dana J. Dykhouse. President and CEO: Brian B. Bird. Incorporated: DE. Address: 3010 West 69th Street, Sioux Falls, SD 57108. Telephone: 605-978-2900. Internet: www.northwesternenergy.com.											
Rate-base expansion should drive growth.				(The rate base is the dollar value of assets for which a utility is allowed to earn a regulated return on.) In June, NorthWestern completed an \$83 million, 58-megawatt gas-fired power plant in South Dakota, with the potential for added capacity later. A \$275 million, 175-mw gas generation facility in Montana was due to be operational later this year, but was delayed due to environmental permitting troubles. Now cleared, it is expected to come on line in 2024. The company may also add 220 mw of coal-fired generation, assuming it can get regulatory body approval, by doubling its stake in an existing plant at very favorable terms.											
NorthWestern stock, however, is an untimely selection for year-ahead relative price performance.				Rapidly rising yields on Treasury securities has pressured this equity and the stock's of most of the company's peers. We've scaled back our 3- to 5-year Target Price Range for the shares of many utilities, including NWE, on the prospect that the rise in interest rates is more than just a cyclical increase.											
Company's Financial Strength				B++ Stock's Price Stability 90 Price Growth Persistence 30 Earnings Predictability 95											

(A) Diluted egs. Excl. nonrec. gains/(losses): '12, 40c; '15, 27c; '18, 52c; '19, 45c; '20, (15c); '21, 10c; '22, (4c); 1Q-2Q '23, (5c). Qtlly EPS may not sum to full yr. due to rounding.

Next egs. report due early Nov. (B) Div'd paid late Mar., June, Sept. & Dec. ■ Div'd reinvest. (plan avail. † Shrlldr. invest. plan avail. (C) Incl. def'd charges. In '22: \$17.98/sh. (D) In mill.

(E) Rate base: Net orig. cost. Rate allowed on com. eq. in MT in '19 (elec.): 9.65%; in '17 (gas): 9.55%; in SD in '15: none specified; in NE in '07: 10.4%. Reg. Climate: Below Avg.

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Tampa Electric Company, Inc.
Indicated Common Equity Cost Rate
Through Use of a Risk Premium Model
Using an Adjusted Total Market Approach

<u>Line No.</u>		Proxy Group of Fourteen Electric Utilities	Proxy Group of Fourteen Electric Utilities (excl. PRPM)
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	4.90 %	4.90 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A2 Rated Public Utility Bonds (2)	<u>0.73</u>	<u>0.73</u>
3.	Adjusted Prospective Yield on A2 Rated Public Utility Bonds	5.63 %	5.63 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group (3)	<u>0.17</u>	<u>0.17</u>
5.	Adjusted Prospective Bond Yield	5.80 %	5.80 %
6.	Equity Risk Premium (4)	<u>5.67</u>	<u>5.66</u>
7.	Risk Premium Derived Common Equity Cost Rate	<u><u>11.47</u></u> %	<u><u>11.46</u></u> %

- Notes:
- (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 8 and 9 of this Document).
 - (2) The average yield spread of A2 rated public utility bonds over Aaa rated corporate bonds of 0.73% from page 2 of this Document.
 - (3) Adjustment to reflect the Baa1 Moody's LT issuer rating of the Utility Proxy Group as shown on page 3 of this Document. The 0.17% adjustment is derived by taking 2/3 of the spread between A2 and Baa2 Public Utility Bonds ($2/3 * 0.25\% = 0.17\%$) as derived from page 2 of this Document.
 - (4) From page 5 of this Document.

Tampa Electric Company, Inc.
Interest Rates and Bond Spreads for
Moody's Corporate and Public Utility Bonds

Selected Bond Yields

	[1]	[2]	[3]
	<u>Aaa Rated Corporate Bond</u>	<u>A2 Rated Public Utility Bond</u>	<u>Baa2 Rated Public Utility Bond</u>
Dec-2023	4.74 %	5.43 %	5.68 %
Nov-2023	5.28	6.05	6.29
Oct-2023	<u>5.61</u>	<u>6.34</u>	<u>6.61</u>
Average	<u><u>5.21 %</u></u>	<u><u>5.94 %</u></u>	<u><u>6.19 %</u></u>

Selected Bond Spreads

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:
0.73 % (1)

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

Notes:

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

Source of Information:
Bloomberg Professional Services.

Tampa Electric Company, Inc.
Comparison of Long-Term Issuer Ratings for the
Utility Proxy Group

	Moody's		Standard & Poor's	
	Long-Term Issuer Rating	Numerical	Long-Term Issuer Rating	Numerical
<u>Proxy Group of Fourteen Electric Utilities</u>	Rating (1)	Weighting (2)	(1)	Weighting (2)
Alliant Energy Corporation	Baa1	8.0	A/A-	6.5
Ameren Corporation	A3	7.0	BBB+	8.0
American Electric Power Corporation	Baa1	8.0	A-	7.0
Duke Energy Corporation	A3	7.0	BBB+	8.0
Edison International	Baa1	8.0	BBB	9.0
Entergy Corporation	Baa1	8.0	BBB+	8.0
Evergy, Inc.	Baa1	8.0	BBB+	8.0
IDACORP, Inc.	Baa1	8.0	BBB	9.0
NorthWestern Corporation	Baa2	9.0	BBB	9.0
OGE Energy Corporation	A3	7.0	A-	7.0
Pinnacle West Capital Corporation	A3	7.0	BBB+	8.0
Portland General Electric Company	A3	7.0	BBB+	8.0
Southern Company	A3	7.0	BBB+	8.0
Xcel Energy Inc.	A3	7.0	A-	7.0
Average	Baa1	7.6	BBB+	7.9
Tampa Electric Company, Inc.	A3	7.0	BBB+	8.0

Notes:

- (1) Ratings are that of the average of each company's utility operating subsidiaries.
- (2) From page 4 of this Document.

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

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

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

Tampa Electric Company, Inc.
Judgment of Equity Risk Premium for the
Utility Proxy Group

<u>Line No.</u>		<u>Proxy Group of Fourteen Electric Utilities</u>	<u>Proxy Group of Fourteen Electric Utilities (excl. PRPM)</u>
1.	Calculated equity risk premium based on the total market using the beta approach (1)	7.36 %	7.32 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A2 rated bonds (2)	4.80	4.80
3.	Predicted Equity Risk Premium Based on Regression Analysis of 1,232 Fully-Litigated Electric Cases (3)	<u>4.85</u>	<u>4.85</u>
4.	Average equity risk premium	<u><u>5.67 %</u></u>	<u><u>5.66 %</u></u>

Notes: (1) From page 6 of this Document.
(2) From page 10 of this Document.
(3) From page 11 of this Document.

Tampa Electric Company, Inc.
Derivation of Equity Risk Premium Based on the Total Market Approach
Using the Beta for the
Utility Proxy Group

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Fourteen Electric Utilities</u>	<u>Proxy Group of Fourteen Electric Utilities (excl. PRPM)</u>
1.	Kroll Equity Risk Premium (1)	5.82 %	5.82 %
2.	Regression on Kroll Risk Premium Data (2)	7.27	7.27
3.	Kroll Equity Risk Premium based on PRPM (3)	9.35	NA
4.	Equity Risk Premium Based on Value Line Summary and Index (4)	10.25	10.25
5.	Equity Risk Premium Based on Value Line S&P 500 Companies (5)	9.24	9.24
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>12.62</u>	<u>12.62</u>
7.	Conclusion of Equity Risk Premium	9.09 %	9.04 %
8.	Adjusted Beta (7)	<u>0.81</u>	<u>0.81</u>
9.	Forecasted Equity Risk Premium	<u><u>7.36</u></u> %	<u><u>7.32</u></u> %

Notes provided on page 7 of this Document.

Tampa Electric Company, Inc.
Derivation of Equity Risk Premium Based on the Total Market Approach
Using the Beta for the
Utility Proxy Group

Notes:

- (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Kroll 2022 SBBI® Yearbook minus the arithmetic mean monthly yield of Moody's average Aaa and Aa corporate bonds from 1928-2022.
- (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 Aa rated corporate bond yields from 1928-2022 referenced in note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is discussed in Mr. D'Ascendi's Direct Testimony. The PRPM risk premium is derived by applying the PRPM to the monthly risk premiums between Kroll large company common stock monthly returns and average Aaa and Aa corporate monthly bond yields, from January 1928 through December 2023.
- (4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the average consensus forecast of Aaa corporate bonds of 4.90% (from page 1 of this Document) from the projected 3-5 year total annual market return of 15.15% (described fully in note 1 on page 2 of Document No. 6).
- (5) Using data from Value Line for the S&P 500, an expected total return of 14.14% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 4.90% results in an expected equity risk premium of 9.24%.
- (6) Using data from Bloomberg for the S&P 500, an expected total return of 17.52% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 4.90% results in an expected equity risk premium of 12.62%.
- (7) Average of mean and median beta from page 1 of Document No. 6.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2023 SBBI Yearbook, Kroll.
Value Line Summary and Index.
Blue Chip Financial Forecasts December 28, 2023 and December 1, 2023
Bloomberg Professional Services.

Tampa Electric Company, Inc.
Derivation of Mean Equity Risk Premium Based Studies
Using Holding Period Returns and
Projected Market Appreciation of the S&P Utility Index

<u>Line No.</u>	<u>Equity Risk Premium based on S&P Utility Index Holding Period Returns (1):</u>	<u>Implied Equity Risk Premium</u>	<u>Implied Equity Risk Premium (excl. PRPM)</u>
1.	Historical Equity Risk Premium	4.20 %	4.20 %
2.	Regression of Historical Equity Risk Premium (2)	5.01	5.01
3.	Forecasted Equity Risk Premium Based on PRPM (3)	4.80	NA
4.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Value Line Data) (4)	5.00	5.00
5.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Bloomberg Data) (5)	4.98	4.98
6.	Average Equity Risk Premium (6)	4.80 %	4.80 %

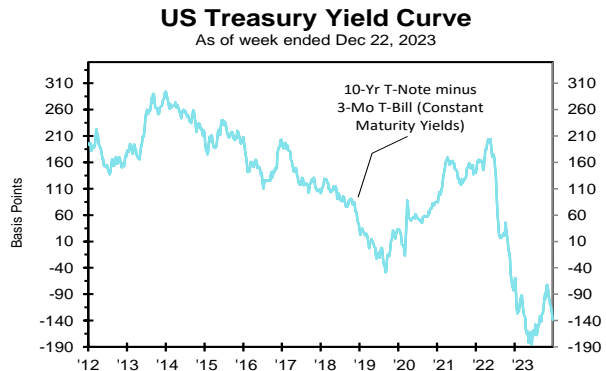
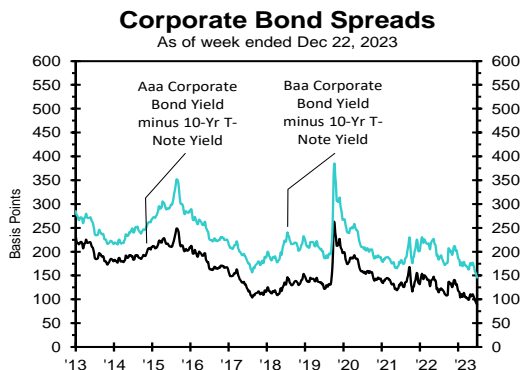
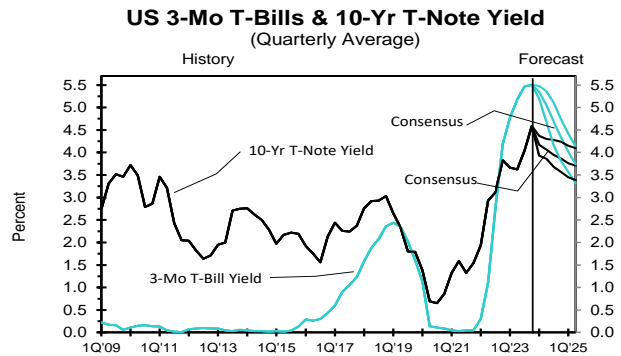
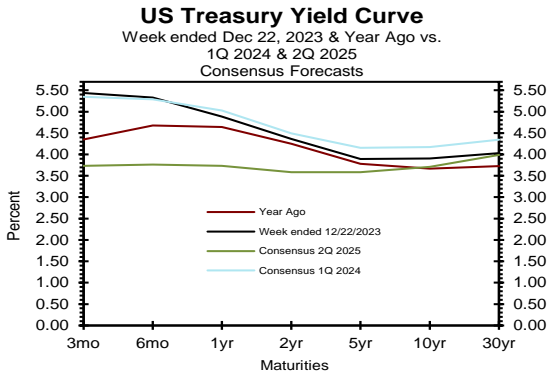
- Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1928-2022. Holding period returns are calculated based upon income received (dividends and interest) plus the relative change in the market value of a security over a one-year 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 - 2022 referenced in note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is applied to the risk premium of the monthly total returns of the S&P Utility Index and the monthly yields on Moody's A2 rated public utility bonds from January 1928 - December 2023.
- (4) Using data from Value Line for the S&P Utilities Index, an expected return of 10.63% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A2 rated public utility bond yield of 5.63%, calculated on line 3 of page 1 of this Document results in an equity risk premium of 5.00%. (10.63% - 5.63% = 5.00%)
- (5) Using data from Bloomberg Services for the S&P Utilities Index, an expected return of 10.61% was derived based on expected dividend yields and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A2 rated public utility bond yield of 5.63%, calculated on line 3 of page 1 of this Document results in an equity risk premium of 4.98%. (10.61% - 5.63% = 4.98%)
- (6) Average of lines 1 through 5.

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

Interest Rates	History								Consensus Forecasts-Quarterly Avg.						
	Average For Week Ending				Average For Month				Latest Qtr	1Q 2024	2Q 2024	3Q 2024	4Q 2024	1Q 2025	2Q 2025
	Dec 22	Dec 15	Dec 8	Dec 1	Nov	Oct	Sep	4Q 2023*	2024	2024	2024	2024	2025	2025	
Federal Funds Rate	5.33	5.33	5.33	5.33	5.33	5.33	5.33	5.33	5.3	5.1	4.8	4.4	4.1	3.8	
Prime Rate	8.50	8.50	8.50	8.50	8.50	8.50	8.50	8.50	8.4	8.2	7.9	7.6	7.2	7.0	
SOFR	5.31	5.31	5.33	5.33	5.32	5.31	5.31	5.32	5.3	5.1	4.8	4.5	4.2	3.8	
Commercial Paper, 1-mo.	5.32	5.32	5.33	5.34	5.33	5.33	5.31	5.33	5.3	5.1	4.7	4.4	4.1	3.8	
Treasury bill, 3-mo.	5.44	5.45	5.45	5.46	5.52	5.60	5.56	5.53	5.4	5.1	4.7	4.3	4.0	3.7	
Treasury bill, 6-mo.	5.33	5.36	5.38	5.39	5.44	5.57	5.51	5.46	5.3	5.0	4.6	4.3	4.0	3.8	
Treasury bill, 1 yr.	4.88	5.01	5.08	5.16	5.28	5.42	5.44	5.25	5.0	4.7	4.4	4.2	3.9	3.7	
Treasury note, 2 yr.	4.36	4.54	4.62	4.70	4.88	5.07	5.02	4.85	4.5	4.2	4.0	3.8	3.7	3.6	
Treasury note, 5 yr.	3.90	4.06	4.17	4.27	4.49	4.77	4.49	4.47	4.2	4.0	3.9	3.8	3.6	3.6	
Treasury note, 10 yr.	3.91	4.06	4.19	4.32	4.50	4.80	4.38	4.49	4.2	4.1	3.9	3.9	3.8	3.7	
Treasury note, 30 yr.	4.03	4.17	4.30	4.49	4.66	4.95	4.47	4.63	4.3	4.3	4.2	4.1	4.0	4.0	
Corporate Aaa bond	4.84	4.95	5.11	5.27	5.52	5.87	5.38	5.51	5.1	5.0	4.9	4.8	4.8	4.7	
Corporate Baa bond	5.39	5.51	5.70	5.88	6.15	6.53	6.03	6.13	6.1	6.0	6.0	5.9	5.8	5.8	
State & Local bonds	4.05	4.16	4.23	4.33	4.56	4.88	4.54	4.57	4.3	4.3	4.2	4.2	4.1	4.1	
Home mortgage rate	6.67	6.95	7.03	7.22	7.44	7.62	7.20	7.36	6.9	6.8	6.6	6.4	6.3	6.1	

Key Assumptions	History								Consensus Forecasts-Quarterly					
	1Q				2Q				3Q				4Q	
	2022	2022	2022	2022	2023	2023	2023	2023	2024	2024	2024	2024	2025	2025
Fed's AFE \$ Index	108.3	113.5	118.8	119.8	115.5	114.6	115.0	117.1	115.2	114.9	114.8	114.7	114.4	114.4
Real GDP	-2.0	-0.6	2.7	2.6	2.2	2.1	4.9	1.2	0.9	0.5	0.7	1.2	1.8	2.1
GDP Price Index	8.5	9.1	4.4	3.9	3.9	1.7	3.3	2.7	2.3	2.3	2.3	2.2	2.2	2.1
Consumer Price Index	9.2	9.7	5.5	4.2	3.8	2.7	3.6	2.9	2.4	2.4	2.4	2.3	2.2	2.2
PCE Price Index	7.7	7.2	4.7	4.1	4.2	2.5	2.6	2.6	2.2	2.2	2.2	2.2	2.1	2.0

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 4Q 2023 based on historical data through the week ended December 22. **Data for 4Q 2023 for the Fed's AFE \$ Index based on data through the week ended December 22. Figures for 4Q 2023 Real GDP, GDP Chained Price Index, Consumer Price Index, and PCE Price Index are consensus forecasts from the December 2023 survey.



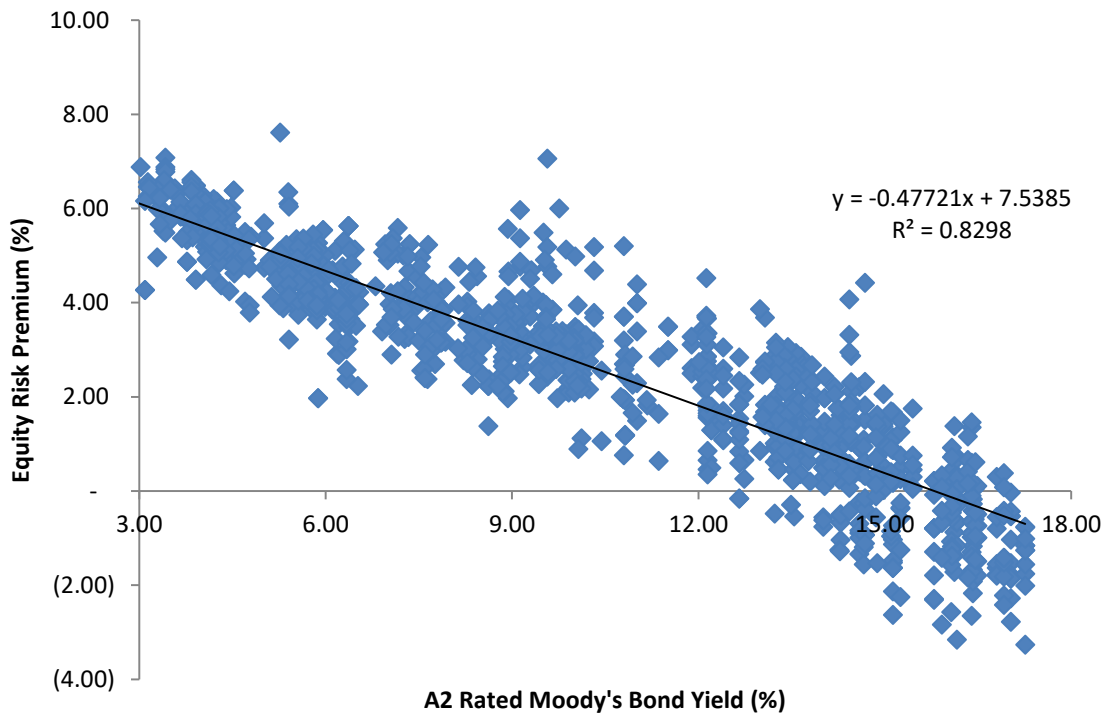
14 ■ BLUE CHIP FINANCIAL FORECASTS ■ DECEMBER 1, 2023

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 2025 through 2029 and averages for the five-year periods 2025-2029 and 2030-2034. Apply these projections cautiously. Few if any economic, demographic and political forces can be evaluated accurately over such long time spans.

		----- Average For The Year -----					Five-Year Averages	
		2025	2026	2027	2028	2029	2025-2029	2030-2034
1. Federal Funds Rate	CONSENSUS	3.8	3.2	3.1	3.0	3.0	3.2	3.0
	Top 10 Average	4.3	3.6	3.6	3.5	3.5	3.7	3.5
	Bottom 10 Average	3.3	2.7	2.6	2.6	2.5	2.7	2.5
2. Prime Rate	CONSENSUS	6.9	6.3	6.2	6.2	6.2	6.3	6.1
	Top 10 Average	7.3	6.7	6.7	6.6	6.6	6.8	6.6
	Bottom 10 Average	6.5	5.9	5.7	5.7	5.7	5.9	5.6
3. SOFR	CONSENSUS	3.8	3.2	3.1	3.1	3.1	3.3	3.0
	Top 10 Average	4.1	3.6	3.5	3.5	3.4	3.6	3.4
	Bottom 10 Average	3.4	2.9	2.7	2.7	2.6	2.9	2.6
4. Commercial Paper, 1-Mo	CONSENSUS	3.7	3.2	3.2	3.2	3.1	3.3	3.1
	Top 10 Average	3.9	3.5	3.4	3.4	3.4	3.5	3.4
	Bottom 10 Average	3.5	2.9	2.8	2.8	2.8	3.0	2.7
5. Treasury Bill Yield, 3-Mo	CONSENSUS	3.7	3.2	3.1	3.0	3.0	3.2	3.0
	Top 10 Average	4.1	3.6	3.6	3.5	3.5	3.7	3.5
	Bottom 10 Average	3.2	2.7	2.6	2.5	2.5	2.7	2.4
6. Treasury Bill Yield, 6-Mo	CONSENSUS	3.7	3.3	3.2	3.2	3.1	3.3	3.1
	Top 10 Average	4.1	3.7	3.6	3.6	3.6	3.7	3.6
	Bottom 10 Average	3.4	2.9	2.8	2.7	2.7	2.9	2.7
7. Treasury Bill Yield, 1-Yr	CONSENSUS	3.7	3.4	3.3	3.3	3.2	3.4	3.2
	Top 10 Average	4.1	3.8	3.7	3.7	3.7	3.8	3.7
	Bottom 10 Average	3.3	3.0	2.9	2.8	2.8	3.0	2.8
8. Treasury Note Yield, 2-Yr	CONSENSUS	3.7	3.5	3.4	3.4	3.4	3.5	3.4
	Top 10 Average	4.1	3.9	3.9	3.9	3.9	3.9	3.9
	Bottom 10 Average	3.3	3.1	3.0	2.9	2.9	3.0	2.9
9. Treasury Note Yield, 5-Yr	CONSENSUS	3.7	3.7	3.7	3.7	3.7	3.7	3.7
	Top 10 Average	4.1	4.1	4.2	4.2	4.3	4.2	4.3
	Bottom 10 Average	3.3	3.2	3.2	3.1	3.1	3.2	3.1
10. Treasury Note Yield, 10-Yr	CONSENSUS	3.9	3.9	3.9	3.9	3.9	3.9	3.9
	Top 10 Average	4.3	4.4	4.5	4.5	4.5	4.4	4.5
	Bottom 10 Average	3.5	3.3	3.3	3.3	3.3	3.3	3.3
11. Treasury Bond Yield, 30-Yr	CONSENSUS	4.1	4.1	4.1	4.2	4.2	4.1	4.2
	Top 10 Average	4.5	4.6	4.7	4.7	4.7	4.6	4.8
	Bottom 10 Average	3.8	3.6	3.6	3.6	3.6	3.7	3.6
12. Corporate Aaa Bond Yield	CONSENSUS	5.0	4.9	4.9	5.0	5.0	4.9	5.0
	Top 10 Average	5.3	5.3	5.4	5.5	5.5	5.4	5.5
	Bottom 10 Average	4.6	4.5	4.5	4.5	4.5	4.5	4.4
13. Corporate Baa Bond Yield	CONSENSUS	6.0	6.0	6.0	6.0	6.0	6.0	6.0
	Top 10 Average	6.4	6.4	6.5	6.6	6.6	6.5	6.6
	Bottom 10 Average	5.7	5.5	5.5	5.6	5.6	5.6	5.6
14. State & Local Bonds Yield	CONSENSUS	4.3	4.3	4.3	4.3	4.3	4.3	4.3
	Top 10 Average	4.6	4.7	4.7	4.8	4.8	4.7	4.9
	Bottom 10 Average	4.0	3.8	3.9	3.9	3.8	3.9	3.8
15. Home Mortgage Rate	CONSENSUS	6.2	5.9	5.9	5.9	5.9	5.9	5.8
	Top 10 Average	6.6	6.4	6.4	6.5	6.5	6.5	6.5
	Bottom 10 Average	5.7	5.5	5.4	5.3	5.2	5.4	5.2
A. Fed's AFE Nominal \$ Index	CONSENSUS	114.1	113.0	113.1	113.2	112.8	113.2	112.3
	Top 10 Average	116.0	115.5	115.9	116.5	116.2	116.0	115.7
	Bottom 10 Average	111.8	110.4	110.1	109.6	109.1	110.2	108.5
		----- Year-Over-Year, % Change -----					Five-Year Averages	
		2025	2026	2027	2028	2029	2025-2029	2030-2034
B. Real GDP	CONSENSUS	1.6	2.1	2.1	2.0	2.0	1.9	2.0
	Top 10 Average	2.1	2.4	2.4	2.3	2.3	2.3	2.3
	Bottom 10 Average	1.1	1.8	1.8	1.7	1.7	1.6	1.7
C. GDP Chained Price Index	CONSENSUS	2.2	2.2	2.1	2.1	2.2	2.2	2.2
	Top 10 Average	2.5	2.3	2.3	2.3	2.3	2.3	2.3
	Bottom 10 Average	2.0	2.0	2.0	2.0	2.0	2.0	2.0
D. Consumer Price Index	CONSENSUS	2.3	2.2	2.2	2.2	2.2	2.2	2.2
	Top 10 Average	2.5	2.4	2.4	2.4	2.4	2.4	2.4
	Bottom 10 Average	2.1	2.1	2.0	2.0	2.0	2.0	2.0
E. PCE Price Index	CONSENSUS	2.2	2.1	2.1	2.1	2.1	2.1	2.1
	Top 10 Average	2.3	2.3	2.2	2.2	2.2	2.2	2.3
	Bottom 10 Average	2.0	2.0	1.9	1.9	2.0	1.9	2.0

Tampa Electric Company, Inc.
Prediction of Equity Risk Premiums Relative to
Moody's A2 Rated Utility Bond Yields - Electric Utilities



		Prospective A2 Rated Utility Bond (1)	Prospective Equity Risk Premium
<u>Constant</u>	<u>Slope</u>	<u>5.63 %</u>	<u>4.85 %</u>
7.5385 %	-0.4772		

Notes:

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

Source of Information: Regulatory Research Associates.

Tampa Electric Company, Inc.
Indicated Common Equity Cost Rate Through Use
of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fourteen Electric Utilities	Value Line Adjusted Beta	Bloomberg Adjusted Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
Alliant Energy Corporation	0.90	0.72	0.81	10.02 %	4.15 %	12.26 %	12.74 %	12.50 %
Ameren Corporation	0.90	0.72	0.81	10.02	4.15	12.26	12.74	12.50
American Electric Power Corporation	0.80	0.67	0.74	10.02	4.15	11.56	12.21	11.89
Duke Energy Corporation	0.85	0.68	0.76	10.02	4.15	11.76	12.36	12.06
Edison International	1.00	0.87	0.93	10.02	4.15	13.47	13.64	13.55 (4)
Entergy Corporation	0.95	0.75	0.85	10.02	4.15	12.66	13.04	12.85
Evergy, Inc.	0.95	0.70	0.82	10.02	4.15	12.36	12.82	12.59
IDACORP, Inc.	0.85	0.69	0.77	10.02	4.15	11.86	12.44	12.15
NorthWestern Corporation	0.95	0.68	0.81	10.02	4.15	12.26	12.74	12.50
OGE Energy Corporation	1.05	0.74	0.90	10.02	4.15	13.17	13.42	13.29
Pinnacle West Capital Corporation	0.95	0.73	0.84	10.02	4.15	12.56	12.97	12.77
Portland General Electric Company	0.90	0.70	0.80	10.02	4.15	12.16	12.66	12.41
Southern Company	0.90	0.67	0.78	10.02	4.15	11.96	12.51	12.24
Xcel Energy Inc.	0.85	0.68	0.76	10.02	4.15	11.76	12.36	12.06
Mean			0.81			12.29 %	12.76 %	12.45 %
Median			0.81			12.26 %	12.74 %	12.50 %
Average of Mean and Median			0.81			12.28 %	12.75 %	12.48 %

Results Excluding the PRPM MRP

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fourteen Electric Utilities	Value Line Adjusted Beta	Bloomberg Adjusted Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
Alliant Energy Corporation	0.90	0.72	0.81	9.93 %	4.15 %	12.20 %	12.67 %	12.43 %
Ameren Corporation	0.90	0.72	0.81	9.93	4.15	12.20	12.67	12.43
American Electric Power Corporation	0.80	0.67	0.74	9.93	4.15	11.50	12.15	11.82
Duke Energy Corporation	0.85	0.68	0.76	9.93	4.15	11.70	12.29	12.00
Edison International	1.00	0.87	0.93	9.93	4.15	13.39	13.56	13.47 (4)
Entergy Corporation	0.95	0.75	0.85	9.93	4.15	12.59	12.97	12.78
Evergy, Inc.	0.95	0.70	0.82	9.93	4.15	12.29	12.74	12.52
IDACORP, Inc.	0.85	0.69	0.77	9.93	4.15	11.80	12.37	12.08
NorthWestern Corporation	0.95	0.68	0.81	9.93	4.15	12.20	12.67	12.43
OGE Energy Corporation	1.05	0.74	0.90	9.93	4.15	13.09	13.34	13.21
Pinnacle West Capital Corporation	0.95	0.73	0.84	9.93	4.15	12.49	12.89	12.69
Portland General Electric Company	0.90	0.70	0.80	9.93	4.15	12.10	12.59	12.34
Southern Company	0.90	0.67	0.78	9.93	4.15	11.90	12.44	12.17
Xcel Energy Inc.	0.85	0.68	0.76	9.93	4.15	11.70	12.29	12.00
Mean			0.81			12.22 %	12.69 %	12.38 %
Median			0.81			12.20 %	12.67 %	12.43 %
Average of Mean and Median			0.81			12.21 %	12.68 %	12.41 %

Notes on page 2 of this Document.

Tampa Electric Company, Inc.
Notes to Accompany the Application of the CAPM and ECAPM

Notes:

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

Historical Data MRP Estimates:

Measure 1: Kroll Arithmetic Mean MRP (1926-2022)

Arithmetic Mean Monthly Returns for Large Stocks 1926-2022:	12.03 %
Arithmetic Mean Income Returns on Long-Term Government Bonds:	5.00
MRP based on Kroll Historical Data:	<u>7.03 %</u>

Measure 2: Application of a Regression Analysis to Kroll Historical Data (1926-2022)

8.27 %

Measure 3: Application of the PRPM to Kroll Historical Data: (January 1926 - December 2023)

10.44 %

Value Line MRP Estimates:

Measure 4: Value Line Projected MRP Thirteen weeks ending December 29, 2023.

Total projected return on the market 3-5 years hence*:	15.15 %
Projected Risk-Free Rate (see note 2):	4.15
MRP based on Value Line Summary & Index:	<u>11.00 %</u>

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

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

Total return on the Market based on the S&P 500:	14.14 %
Projected Risk-Free Rate (see note 2):	4.15
MRP based on Value Line data	<u>9.99 %</u>

Measure 6: Bloomberg Projected MRP

Total return on the Market based on the S&P 500:	17.52 %
Projected Risk-Free Rate (see note 2):	4.15
MRP based on Bloomberg data	<u>13.37 %</u>

Average of Value Line, Kroll, and Bloomberg MRP: 10.02 %

Average MRP Excluding the PRPM MRP: 9.93 %

- (2) For reasons explained in the direct testimony, the appropriate risk-free rate for cost of capital purposes is the average forecast of 30 year Treasury Bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts. (See pages 8 and 9 of Document No. 5) The projection of the risk-free rate is illustrated below:

First Quarter 2024	4.30 %
Second Quarter 2024	4.30
Third Quarter 2024	4.20
Fourth Quarter 2024	4.10
First Quarter 2025	4.00
Second Quarter 2025	4.00
2025-2029	4.10
2030-2034	4.20
	<u>4.15 %</u>

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

- (4) Results were excluded from the final average and median as they were more than two standard deviations from the proxy group's mean.

Sources of Information:

Value Line Summary and Index.
Blue Chip Financial Forecasts December 28, 2023 and December 1, 2023
Stocks, Bonds, Bills, and Inflation - 2023 SBBI Yearbook, Kroll.
Bloomberg Professional Services.

Tampa Electric Company, Inc.
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 non-price regulated companies comparable in total risk to the Utility Proxy Group was that the non-price regulated companies be domestic and reported in Value Line Investment Survey (Standard Edition).

The proxy group of non-price regulated companies was selected based on the unadjusted beta range of 0.65 - 0.91 and residual standard error of the regression range of 2.6538 - 3.1650 of the proxy group of fourteen electric utilities.

These ranges are based upon plus or minus two standard deviations of the unadjusted beta and standard error of the regression. Plus or minus three 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 0.1278. 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

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

$$\text{Thus, } 0.1278 = \frac{2.9094}{\sqrt{259}} = \frac{2.9094}{22.7596}$$

Source of Information: Value Line Proprietary Database, December 2023.
Value Line Investment Survey (Standard Edition).

Tampa Electric Company, Inc.
Basis of Selection of Comparable Risk
Domestic Non-Price Regulated Companies

	[1]	[2]	[3]	[4]
Proxy Group of Fourteen Electric Utilities	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Alliant Energy Corporation	0.85	0.72	2.8754	0.0642
Ameren Corporation	0.85	0.72	2.6556	0.0592
American Electric Power Corporation	0.75	0.60	2.8010	0.0625
Duke Energy Corporation	0.85	0.73	2.8589	0.0638
Edison International	0.95	0.90	3.4527	0.0770
Entergy Corporation	0.95	0.85	2.8571	0.0637
Evergy, Inc.	0.90	0.84	2.9841	0.0678
IDACORP, Inc.	0.80	0.65	2.7648	0.0617
NorthWestern Corporation	0.90	0.83	2.8897	0.0645
OGE Energy Corporation	1.00	0.98	2.8969	0.0646
Pinnacle West Capital Corporation	0.90	0.82	3.0709	0.0685
Portland General Electric Company	0.85	0.76	2.9458	0.0657
Southern Company	0.90	0.83	2.7920	0.0623
Xcel Energy Inc.	0.80	0.67	2.8860	0.0644
Average	0.88	0.78	2.9094	0.0650
Beta Range (+/- 2 std. Devs. of Beta) 2 std. Devs. of Beta	0.65 0.13	0.91		
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.6538	3.1650		
Std. dev. of the Res. Std. Err.	0.1278			
2 std. devs. of the Res. Std. Err.	0.2556			

Source of Information: Value Line Proprietary Database, December 2023.

Tampa Electric Company, Inc.
Proxy Group of Non-Price Regulated Companies
Comparable in Total Risk to the
Utility Proxy Group

	[1]	[2]	[3]	[4]
Proxy Group of Forty-Five Non-Price Regulated Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
3M Company	0.95	0.88	2.6568	0.0593
Abbott Labs.	0.90	0.83	2.8864	0.0644
Agilent Technologies	0.95	0.86	2.8378	0.0633
Air Products & Chem.	0.90	0.84	2.8029	0.0625
Alphabet Inc.	0.95	0.86	2.7317	0.0609
Altria Group	0.90	0.80	3.1178	0.0696
Assurant Inc.	0.90	0.80	2.8167	0.0628
Booz Allen Hamilton	0.85	0.75	3.1624	0.0706
Brady Corp.	0.95	0.89	2.9113	0.0650
Bristol-Myers Squibb	0.80	0.68	3.0143	0.0673
Broadridge Fin'l	0.90	0.78	2.8391	0.0633
Brown-Forman 'B'	0.85	0.75	2.8019	0.0625
CACI Int'l	0.90	0.78	3.0796	0.0687
Chemed Corp.	0.80	0.65	2.8629	0.0639
Cisco Systems	0.90	0.81	2.7267	0.0608
CSW Industrials	0.90	0.80	3.0966	0.0691
Danaher Corp.	0.90	0.81	2.6569	0.0593
Dolby Labs.	0.95	0.90	2.7326	0.0610
Fastenal Co.	0.90	0.83	3.0992	0.0691
Franklin Electric	0.95	0.85	2.9918	0.0667
GATX Corp.	0.95	0.90	3.1116	0.0694
Henry (Jack) & Assoc	0.85	0.71	2.9576	0.0660
Hunt (J.B.)	0.95	0.89	3.1607	0.0705
Ingredion Inc.	0.90	0.84	2.8563	0.0637
Int'l Business Mach.	0.95	0.90	2.7698	0.0618
Landstar System	0.80	0.65	2.9423	0.0656
Lockheed Martin	0.90	0.83	2.8568	0.0637
Monster Beverage	0.85	0.75	3.0527	0.0681
MSC Industrial Direc	0.95	0.86	2.9664	0.0662
Oracle Corp.	0.85	0.71	2.8932	0.0645
Packaging Corp.	0.95	0.89	2.9972	0.0669
Pfizer, Inc.	0.80	0.69	2.9493	0.0658
Selective Ins. Group	0.85	0.74	3.0019	0.0670
Sensient Techn.	0.95	0.88	2.7605	0.0616
Service Corp. Int'l	0.95	0.85	3.0027	0.0670
Sherwin-Williams	0.95	0.86	2.8633	0.0639
Sirius XM Holdings	0.90	0.82	2.9907	0.0667
Smith (A.O.)	0.90	0.80	2.9692	0.0662
Texas Instruments	0.90	0.80	2.8210	0.0629
Thermo Fisher Sci.	0.90	0.78	2.7308	0.0609
UniFirst Corp.	0.95	0.87	2.8590	0.0638
VeriSign Inc.	0.95	0.85	2.9410	0.0656
Waters Corp.	0.95	0.86	3.0260	0.0675
Watsco, Inc.	0.85	0.76	2.9424	0.0656
Western Union	0.85	0.70	3.0536	0.0681
Average	0.90	0.81	2.9178	0.0651
Proxy Group of Fourteen Electric Utilities	0.88	0.78	2.9094	0.0650

Source of Information:

Value Line Proprietary Database, December 2023.

Tampa Electric Company, Inc.
 Summary of Cost of Equity Models Applied to
 Proxy Group of Non-Price Regulated Companies
 Comparable in Total Risk to the
 Utility Proxy Group

<u>Principal Methods</u>	<u>Proxy Group of Forty-Five Non-Price Regulated Companies</u>	<u>Proxy Group of Forty-Five Non-Price Regulated Companies (excl. PRPM)</u>
Discounted Cash Flow Model (DCF) (1)	10.80 %	10.80 %
Risk Premium Model (RPM) (2)	13.76	13.72
Capital Asset Pricing Model (CAPM)	<u>13.28</u> (3)	<u>13.20</u> (4)
Mean	<u>12.61</u> %	<u>12.57</u> %
Median	<u>13.28</u> %	<u>13.20</u> %
Average of Mean and Median	<u>12.95</u> %	<u>12.89</u> %

Notes:

- (1) From page 2 of this Document.
- (2) From page 3 of this Document.
- (3) From page 6 of this Document.
- (4) From page 7 of this Document.

Tampa Electric Company, Inc.
DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the
Utility Proxy Group

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Fourty-Five Non-Price Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS (1)	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (2)
3M Company	6.23 %	4.50 %	7.30 %	NA %	5.90 %	6.41 %	12.31 %
Abbott Labs.	2.20	4.50	9.00	-2.00	6.75	2.27	9.02
Agilent Technologies	0.79	13.50	8.00	7.70	9.73	0.83	10.56
Air Products & Chem.	2.55	10.50	11.30	10.02	10.61	2.69	13.30
Alphabet Inc.	0.00	13.00	16.60	17.53	15.71	0.00	NA
Altria Group	9.48	6.00	3.00	2.19	3.73	9.66	13.39
Assurant Inc.	1.80	10.50	14.60	14.60	13.23	1.92	15.15
Booz Allen Hamilton	1.50	8.00	12.00	12.00	10.67	1.58	12.25
Brady Corp.	1.70	11.00	7.00	7.00	8.33	1.77	10.10
Bristol-Myers Squibb	4.59	NA	3.10	-0.35	3.10	4.66	7.76
Broadridge Fin'l	1.73	9.50	NA	11.80	10.65	1.82	12.47
Brown-Forman 'B'	1.52	16.50	NA	11.00	13.75	1.62	15.37
CACI Int'l	0.00	7.00	9.50	6.70	7.73	0.00	NA
Chemed Corp.	0.28	6.50	8.90	10.00	8.47	0.29	8.76
Cisco Systems	3.06	8.50	6.20	5.77	6.82	3.16	9.98
CSW Industrials	0.42	8.00	16.00	12.00	12.00	0.45	12.45
Danaher Corp.	0.45	11.00	12.00	-1.40	11.50	0.48	11.98
Dolby Labs.	1.42	9.50	NA	16.00	12.75	1.51	14.26
Fastenal Co.	2.31	6.50	9.00	6.33	7.28	2.39	9.67
Franklin Electric	1.00	10.50	12.00	13.40	11.97	1.06	13.03
GATX Corp.	1.99	8.50	NA	12.00	10.25	2.09	12.34
Henry (Jack) & Assoc	1.36	6.50	8.00	7.10	7.20	1.41	8.61
Hunt (J.B.)	0.91	9.00	15.00	4.50	9.50	0.95	10.45
Ingredion Inc.	3.10	8.00	11.00	10.00	9.67	3.25	12.92
Int'l Business Mach.	4.38	3.00	3.90	2.52	3.14	4.45	7.59
Landstar System	0.75	1.00	NA	12.00	6.50	0.77	7.27
Lockheed Martin	2.83	7.00	8.60	11.33	8.98	2.96	11.94
Monster Beverage	0.00	11.00	20.80	22.64	18.15	0.00	NA
MSC Industrial Direc	3.35	5.00	NA	10.60	7.80	3.48	11.28
Oracle Corp.	1.46	10.00	9.10	9.61	9.57	1.53	11.10
Packaging Corp.	3.17	9.00	5.00	-14.29	7.00	3.28	10.28
Pfizer, Inc.	5.59	2.00	7.00	-13.35	4.50	5.72	10.22
Selective Ins. Group	1.37	15.00	23.80	23.80	20.87	1.51	22.38 (3)
Sensient Techn.	2.76	2.50	NA	3.80	3.15	2.80	5.95
Service Corp. Int'l	1.92	5.00	7.20	12.00	8.07	2.00	10.07
Sherwin-Williams	0.90	7.00	12.40	14.17	11.19	0.95	12.14
Sirius XM Holdings	2.20	28.50	6.60	8.26	14.45	2.36	16.81
Smith (A.O.)	1.73	9.50	9.00	8.00	8.83	1.81	10.64
Texas Instruments	3.36	3.50	9.00	10.00	7.50	3.49	10.99
Thermo Fisher Sci.	0.29	9.50	7.70	2.10	6.43	0.30	6.73
UniFirst Corp.	0.77	9.00	NA	8.50	8.75	0.80	9.55
VeriSign Inc.	0.00	13.00	NA	8.00	10.50	0.00	NA
Waters Corp.	0.00	10.00	3.90	3.84	5.91	0.00	NA
Watsco, Inc.	2.53	9.00	9.00	4.42	7.47	2.62	10.09
Western Union	7.73	-0.50	NA	0.97	0.97	7.77	8.74

NA= Not Available

Mean 10.96 %

Median 10.64 %

Average of Mean and Median 10.80 %

Notes:

- (1) Average of columns 2 through 4 excluding negative growth rates.
- (2) The application of the DCF model to the domestic, non-price regulated comparable risk companies is identical to the application of the DCF to the Utility Proxy Groups. The dividend yield is derived by using the 60 day average price and the spot indicated dividend as of December 29, 2023. 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.
- (3) Results were excluded from the final average and median as they were more than two standard deviations from the proxy group's mean.

Source of Information: Value Line Investment Survey.
www.zacks.com, Downloaded on 12/29/2023.
www.yahoo.com, Downloaded on 12/29/2023.

Tampa Electric Company, Inc.
Indicated Common Equity Cost Rate
Through Use of a Risk Premium Model
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Fourty-Five Non- Price Regulated Companies</u>	<u>Proxy Group of Fourty-Five Non- Price Regulated Companies (excl. PRPM)</u>
1.	Prospective Yield on Baa2 Rated Corporate Bonds (1)	5.95 %	5.95 %
2.	Adjustment to Reflect Bond rating Difference of Non-Price Regulated Companies (2)	<u>(0.28)</u>	<u>(0.28)</u>
3.	Adjusted Prospective Bond Yield	5.67	5.67
4.	Equity Risk Premium (3)	<u>8.09</u>	<u>8.05</u>
5.	Risk Premium Derived Common Equity Cost Rate	<u>13.76 %</u>	<u>13.72 %</u>

Notes: (1) Average forecast of Baa corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated December 28, 2023 and December 1, 2023 (see pages 8 and 9 of Document No. 4). The estimates are detailed below.

First Quarter 2024	6.10 %
Second Quarter 2024	6.00
Third Quarter 2024	6.00
Fourth Quarter 2024	5.90
First Quarter 2025	5.80
Second Quarter 2025	5.80
2025-2029	6.00
2030-2034	<u>6.00</u>
Average	<u>5.95 %</u>

(2) The average yield spread of Baa2 rated corporate bonds over A2 corporate bonds for the three months ending December 2023. To reflect the A3 average rating of the Non-Price Regulated Proxy Group, the prospective yield on Baa corporate bonds must be adjusted by 2/3 of the spread between A2 and Baa2 corporate bond yields as shown below:

	<u>A2 Corp. Bond Yield</u>	<u>Baa2 Corp. Bond Yield</u>	<u>Spread</u>
Dec-23	5.26 %	5.65 %	0.39 %
Nov-23	5.87	6.29	0.42
Oct-23	6.18	6.63	<u>0.45</u>
		Average yield spread	<u>0.42</u>
		2/3 of spread	<u>0.28</u>

(3) From page 5 of this Document.

Tampa Electric Company, Inc.
Comparison of Long-Term Issuer Ratings for the
Utility Proxy Group

Proxy Group of Fourty-Five Non-Price Regulated Companies	Moody's Long-Term Issuer Rating December 2023		Standard & Poor's Long-Term Issuer Rating December 2023	
	Long-Term Issuer Rating	Numerical Weighting (1)	Long-Term Issuer Rating	Numerical Weighting (1)
3M Company	A3	7.0	BBB+	8.0
Abbott Labs.	Aa3	4.0	AA-	4.0
Agilent Technologies	Baa1	8.0	BBB+	8.0
Air Products & Chem.	A2	6.0	A	6.0
Alphabet Inc.	Aa2	3.0	AA+	2.0
Altria Group	A3	7.0	BBB	9.0
Assurant Inc.	Baa2	9.0	BBB	9.0
Booz Allen Hamilton	NA	--	NA	--
Brady Corp.	NA	--	NA	--
Bristol-Myers Squibb	A2	6.0	A	6.0
Broadridge Fin'l	Baa2	9.0	BBB	9.0
Brown-Forman 'B'	A1	5.0	A-	7.0
CACI Int'l	NA	--	BB+	11.0
Chemed Corp.	WR	--	NR	--
Cisco Systems	A1	5.0	AA-	4.0
CSW Industrials	NA	--	NA	--
Danaher Corp.	A3	7.0	A-	7.0
Dolby Labs.	NA	--	NA	--
Fastenal Co.	NA	--	NA	--
Franklin Electric	NA	--	NA	--
GATX Corp.	Baa2	9.0	BBB	9.0
Henry (Jack) & Assoc	NA	--	NA	--
Hunt (J.B.)	Baa1	8.0	BBB+	8.0
Ingredion Inc.	Baa1	8.0	BBB	9.0
Int'l Business Mach.	A3	7.0	A-	7.0
Landstar System	NA	--	NA	--
Lockheed Martin	A2	6.0	A-	7.0
Monster Beverage	NA	--	NA	--
MSC Industrial Direc	NA	--	NA	--
Oracle Corp.	Baa2	9.0	BBB	9.0
Packaging Corp.	Baa2	9.0	BBB	9.0
Pfizer, Inc.	A2	6.0	A	6.0
Selective Ins. Group	Baa2	9.0	BBB	9.0
Sensient Techn.	WR	--	NR	--
Service Corp. Int'l	Ba3	13.0	BB+	11.0
Sherwin-Williams	Baa2	9.0	BBB	9.0
Sirius XM Holdings	NA	--	BB	12.0
Smith (A.O.)	NA	--	NA	--
Texas Instruments	Aa3	4.0	A+	5.0
Thermo Fisher Sci.	A3	7.0	A-	7.0
UniFirst Corp.	NA	--	NA	--
VeriSign Inc.	Baa3	10.0	BBB	9.0
Waters Corp.	NA	--	NA	--
Watsco, Inc.	NA	--	NA	--
Western Union	Baa2	9.0	BBB	9.0
Average	<u>A3</u>	<u>7.4</u>	<u>BBB+</u>	<u>7.8</u>

Notes:
(1) From page 4 of Document No. 5.

Source of Information:
Bloomberg Professional Services.

Tampa Electric Company, Inc.
Derivation of Equity Risk Premium Based on the Total Market Approach
Using the Beta for
Non-Price Regulated Companies of Comparable risk to the
Utility Proxy Group

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Fourty- Five Non-Price Regulated Companies</u>	<u>Proxy Group of Fourty- Five Non-Price Regulated Companies (excl. PRPM)</u>
1.	Kroll Equity Risk Premium (1)	5.82 %	5.82 %
2.	Regression on Kroll Risk Premium Data (2)	7.27	7.27
3.	Kroll Equity Risk Premium based on PRPM (3)	9.35	NA
4.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (4)	10.25	10.25
5.	Equity Risk Premium Based on <u>Value Line</u> S&P 500 Companies (5)	9.24	9.24
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>12.62</u>	<u>12.62</u>
7.	Conclusion of Equity Risk Premium	9.09 %	9.04 %
8.	Adjusted Beta (7)	<u>0.89</u>	<u>0.89</u>
9.	Forecasted Equity Risk Premium	<u>8.09 %</u>	<u>8.05 %</u>

Notes:

- (1) From note 1 of page 7 of Document No. 5.
- (2) From note 2 of page 7 of Document No. 5.
- (3) From note 3 of page 7 of Document No. 5.
- (4) From note 4 of page 7 of Document No. 5.
- (5) From note 5 of page 7 of Document No. 5.
- (6) From note 6 of page 7 of Document No. 5.
- (7) Average of mean and median beta from page 6 of this Document.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2023 SBBi Yearbook, Kroll.
Value Line Summary and Index.
Blue Chip Financial Forecasts December 28, 2023 and December 1, 2023
Bloomberg Professional Services.

Tampa Electric Company, Inc.
Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the
Utility Proxy Group

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fourty-Five Non-Price Regulated Companies	Value Line Adjusted Beta	Bloomberg Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
3M Company	0.95	1.01	0.98	10.02 %	4.15 %	13.97 %	14.02 %	13.99 %
Abbott Labs.	0.90	0.84	0.87	10.02	4.15	12.87	13.19	13.03
Agilent Technologies	0.95	1.07	1.01	10.02	4.15	14.27	14.24	14.26
Air Products & Chem.	0.90	0.88	0.89	10.02	4.15	13.07	13.34	13.20
Alphabet Inc.	0.90	1.13	1.01	10.02	4.15	14.27	14.24	14.26
Altria Group	0.85	0.63	0.74	10.02	4.15	11.56	12.21	11.89
Assurant Inc.	0.90	0.76	0.83	10.02	4.15	12.46	12.89	12.68
Booz Allen Hamilton	0.85	0.84	0.85	10.02	4.15	12.66	13.04	12.85
Brady Corp.	0.95	0.88	0.91	10.02	4.15	13.27	13.49	13.38
Bristol-Myers Squibb	0.80	0.57	0.68	10.02	4.15	10.96	11.76	11.36 (4)
Broadridge Fin'l	0.90	1.02	0.96	10.02	4.15	13.77	13.87	13.82
Brown-Forman 'B'	0.90	0.84	0.87	10.02	4.15	12.87	13.19	13.03
CACI Int'l	0.90	0.77	0.84	10.02	4.15	12.56	12.97	12.77
Chemed Corp.	0.80	0.58	0.69	10.02	4.15	11.06	11.84	11.45 (4)
Cisco Systems	0.90	0.84	0.87	10.02	4.15	12.87	13.19	13.03
CSW Industrials	0.90	0.78	0.84	10.02	4.15	12.56	12.97	12.77
Danaher Corp.	0.90	1.08	0.99	10.02	4.15	14.07	14.09	14.08
Dolby Labs.	0.95	0.86	0.91	10.02	4.15	13.27	13.49	13.38
Fastenal Co.	0.90	0.94	0.92	10.02	4.15	13.37	13.57	13.47
Franklin Electric	0.90	0.92	0.91	10.02	4.15	13.27	13.49	13.38
GATX Corp.	0.95	0.90	0.92	10.02	4.15	13.37	13.57	13.47
Henry (Jack) & Assoc	0.85	0.82	0.84	10.02	4.15	12.56	12.97	12.77
Hunt (J.B.)	0.95	0.96	0.96	10.02	4.15	13.77	13.87	13.82
Ingredion Inc.	0.90	0.63	0.77	10.02	4.15	11.86	12.44	12.15
Int'l Business Mach.	0.95	0.77	0.86	10.02	4.15	12.77	13.12	12.94
Landstar System	0.80	0.82	0.81	10.02	4.15	12.26	12.74	12.50
Lockheed Martin	0.90	0.64	0.77	10.02	4.15	11.86	12.44	12.15
Monster Beverage	0.85	0.72	0.79	10.02	4.15	12.06	12.59	12.33
MSC Industrial Direc	0.90	0.87	0.89	10.02	4.15	13.07	13.34	13.20
Oracle Corp.	0.85	1.00	0.93	10.02	4.15	13.47	13.64	13.55
Packaging Corp.	0.95	0.86	0.90	10.02	4.15	13.17	13.42	13.29
Pfizer, Inc.	0.80	0.73	0.77	10.02	4.15	11.86	12.44	12.15
Selective Ins. Group	0.85	0.61	0.73	10.02	4.15	11.46	12.14	11.80
Sensient Techn.	0.95	0.98	0.96	10.02	4.15	13.77	13.87	13.82
Service Corp. Int'l	0.95	0.83	0.89	10.02	4.15	13.07	13.34	13.20
Sherwin-Williams	0.95	1.07	1.01	10.02	4.15	14.27	14.24	14.26
Sirius XM Holdings	0.95	1.05	1.00	10.02	4.15	14.17	14.17	14.17
Smith (A.O.)	0.90	1.03	0.96	10.02	4.15	13.77	13.87	13.82
Texas Instruments	0.90	1.01	0.96	10.02	4.15	13.77	13.87	13.82
Thermo Fisher Sci.	0.90	1.00	0.95	10.02	4.15	13.67	13.79	13.73
UniFirst Corp.	0.90	0.80	0.85	10.02	4.15	12.66	13.04	12.85
VeriSign Inc.	0.90	1.07	0.99	10.02	4.15	14.07	14.09	14.08
Waters Corp.	0.95	1.00	0.98	10.02	4.15	13.97	14.02	13.99
Watsco, Inc.	0.90	1.10	1.00	10.02	4.15	14.17	14.17	14.17
Western Union	0.85	0.86	0.86	10.02	4.15	12.77	13.12	12.94
Mean			<u>0.89</u>			<u>13.04 %</u>	<u>13.32 %</u>	<u>13.26 %</u>
Median			<u>0.89</u>			<u>13.07 %</u>	<u>13.34 %</u>	<u>13.29 %</u>
Average of Mean and Median			<u>0.89</u>			<u>13.06 %</u>	<u>13.33 %</u>	<u>13.28 %</u>

Notes:

- (1) From note 1 of page 2 of Document No. 6.
- (2) From note 2 of page 2 of Document No. 6.
- (3) Average of CAPM and ECAPM cost rates.
- (4) Results were excluded from the final average and median as they were more than two standard deviations from the proxy group's mean.

Tampa Electric Company, Inc.
Traditional CAPM and ECAPM Results (excluding the PRPM MRP) for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the
Utility Proxy Group

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fourty-Five Non-Price Regulated Companies	Value Line Adjusted Beta	Bloomberg Beta	Average Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate	ECAPM Cost Rate	Indicated Common Equity Cost Rate (3)
3M Company	0.95	1.01	0.98	9.93 %	4.15 %	13.88 %	13.93 %	13.91 %
Abbott Labs.	0.90	0.84	0.87	9.93	4.15	12.79	13.11	12.95
Agilent Technologies	0.95	1.07	1.01	9.93	4.15	14.18	14.16	14.17
Air Products & Chem.	0.90	0.88	0.89	9.93	4.15	12.99	13.26	13.13
Alphabet Inc.	0.90	1.13	1.01	9.93	4.15	14.18	14.16	14.17
Altria Group	0.85	0.63	0.74	9.93	4.15	11.50	12.15	11.82
Assurant Inc.	0.90	0.76	0.83	9.93	4.15	12.39	12.82	12.61
Booz Allen Hamilton	0.85	0.84	0.85	9.93	4.15	12.59	12.97	12.78
Brady Corp.	0.95	0.88	0.91	9.93	4.15	13.19	13.41	13.30
Bristol-Myers Squibb	0.80	0.57	0.68	9.93	4.15	10.90	11.70	11.30 (4)
Broadridge Fin'l	0.90	1.02	0.96	9.93	4.15	13.69	13.78	13.74
Brown-Forman 'B'	0.90	0.84	0.87	9.93	4.15	12.79	13.11	12.95
CACI Int'l	0.90	0.77	0.84	9.93	4.15	12.49	12.89	12.69
Chemed Corp.	0.80	0.58	0.69	9.93	4.15	11.00	11.77	11.39 (4)
Cisco Systems	0.90	0.84	0.87	9.93	4.15	12.79	13.11	12.95
CSW Industrials	0.90	0.78	0.84	9.93	4.15	12.49	12.89	12.69
Danaher Corp.	0.90	1.08	0.99	9.93	4.15	13.98	14.01	14.00
Dolby Labs.	0.95	0.86	0.91	9.93	4.15	13.19	13.41	13.30
Fastenal Co.	0.90	0.94	0.92	9.93	4.15	13.29	13.49	13.39
Franklin Electric	0.90	0.92	0.91	9.93	4.15	13.19	13.41	13.30
GATX Corp.	0.95	0.90	0.92	9.93	4.15	13.29	13.49	13.39
Henry (Jack) & Assoc Hunt (J.B.)	0.85	0.82	0.84	9.93	4.15	12.49	12.89	12.69
Ingredion Inc.	0.90	0.96	0.96	9.93	4.15	13.69	13.78	13.74
Ingredion Inc.	0.90	0.63	0.77	9.93	4.15	11.80	12.37	12.08
Int'l Business Mach.	0.95	0.77	0.86	9.93	4.15	12.69	13.04	12.87
Landstar System	0.80	0.82	0.81	9.93	4.15	12.20	12.67	12.43
Lockheed Martin	0.90	0.64	0.77	9.93	4.15	11.80	12.37	12.08
Monster Beverage	0.85	0.72	0.79	9.93	4.15	12.00	12.52	12.26
MSC Industrial Direc	0.90	0.87	0.89	9.93	4.15	12.99	13.26	13.13
Oracle Corp.	0.85	1.00	0.93	9.93	4.15	13.39	13.56	13.47
Packaging Corp.	0.95	0.86	0.90	9.93	4.15	13.09	13.34	13.21
Pfizer, Inc.	0.80	0.73	0.77	9.93	4.15	11.80	12.37	12.08
Selective Ins. Group	0.85	0.61	0.73	9.93	4.15	11.40	12.07	11.74
Sensient Techn.	0.95	0.98	0.96	9.93	4.15	13.69	13.78	13.74
Service Corp. Int'l	0.95	0.83	0.89	9.93	4.15	12.99	13.26	13.13
Sherwin-Williams	0.95	1.07	1.01	9.93	4.15	14.18	14.16	14.17
Sirius XM Holdings	0.95	1.05	1.00	9.93	4.15	14.08	14.08	14.08
Smith (A.O.)	0.90	1.03	0.96	9.93	4.15	13.69	13.78	13.74
Texas Instruments	0.90	1.01	0.96	9.93	4.15	13.69	13.78	13.74
Thermo Fisher Sci.	0.90	1.00	0.95	9.93	4.15	13.59	13.71	13.65
UniFirst Corp.	0.90	0.80	0.85	9.93	4.15	12.59	12.97	12.78
VeriSign Inc.	0.90	1.07	0.99	9.93	4.15	13.98	14.01	14.00
Waters Corp.	0.95	1.00	0.98	9.93	4.15	13.88	13.93	13.91
Watsco, Inc.	0.90	1.10	1.00	9.93	4.15	14.08	14.08	14.08
Western Union	0.85	0.86	0.86	9.93	4.15	12.69	13.04	12.87
Mean			<u>0.89</u>			<u>12.96 %</u>	<u>13.24 %</u>	<u>13.18 %</u>
Median			<u>0.89</u>			<u>12.99 %</u>	<u>13.26 %</u>	<u>13.21 %</u>
Average of Mean and Median			<u>0.89</u>			<u>12.98 %</u>	<u>13.25 %</u>	<u>13.20 %</u>

Notes:

- (1) From note 1 of page 2 of Document No. 6.
- (2) From note 2 of page 2 of Document No. 6.
- (3) Average of CAPM and ECAPM cost rates.
- (4) Results were excluded from the final average and median as they were more than two standard deviations from the proxy group's mean.

Tampa Electric Company, Inc.
Derivation of the Flotation Cost Adjustment to the Cost of Common Equity

Equity Issuances

		[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]
Date	Issuing Company	Shares Issued (1)	Market Price per Share (1)	Average Offering Price per Share (1)	Underwriting Discount (1)	Total Offering Expense per Share (1)	Net Proceeds per Share (2)	Total Flotation Costs (3)	Gross Equity Issue before Costs (4)	Net Proceeds (5)	Flotation Cost Percentage (6)
At-The-Market 2023	Emera Incorporated	8,287,037	NA	48.270	NA	\$ 0.362	\$ 47.91	\$ 3,000,000	\$ 400,000,000	\$ 397,000,000	0.75%
At-The-Market 2022	Emera Incorporated	4,072,469	NA	61.310	NA	\$ 0.491	\$ 60.90	\$ 2,000,000	\$ 250,000,000	\$ 248,000,000	0.80%
At-The-Market 2021	Emera Incorporated	4,987,123	NA	57.630	NA	\$ 0.602	\$ 56.95	\$ 3,000,000	\$ 287,000,000	\$ 284,000,000	1.05%
At-The-Market 2020	Emera Incorporated	4,544,025	NA	56.040	NA	\$ 0.880	\$ 55.24	\$ 4,000,000	\$ 255,000,000	\$ 251,000,000	1.57%
At-The-Market 2019	Emera Incorporated	1,768,120	NA	56.560	NA	\$ 0.735	\$ 55.82	\$ 1,300,000	\$ 100,000,000	\$ 98,700,000	1.30%
12/18/2017	Emera Incorporated	14,614,000	47.980	47.900	1.916	\$ 0.031	\$ 45.95	\$ 29,619,544	\$ 701,179,720	\$ 671,560,176	4.22%
12/8/2016	Emera Incorporated	7,624,500	44.260	45.250	1.810	\$ 0.059	\$ 43.38	\$ 6,702,090	\$ 337,460,370	\$ 330,758,280	1.99%
Total Public Issuances								\$ 49,621,634	\$ 2,330,640,090	\$ 2,281,018,456	2.13%
<u>Flotation Cost Adjustment</u>											
	[11]	[12]	[13]	[14]	[15]	[16]					
		Average Projected EPS Growth Rate (7)	Adjusted Dividend Yield (8)	Average DCF Cost Rate Unadjusted for Flotation (9)	DCF Cost Rate Adjusted for Flotation (10)	Flotation Cost Adjustment (11)					
Proxy Group of Fourteen Electric Utilities		4.33 %	5.27 %	4.44 %	9.71 %	9.81 %				0.10 %	

- Notes: (1) From Company prospectuses, annual filings, or Company provided.
(2) Column [3] - Column [4] - Column [5].
(3) (Column [2] - Column [6]) x Column [1].
(4) Column [1] x Column [2].
(5) Column [1] x Column [6].
(6) Column [7] / Column [8].
(7) From Document No. 4.
(8) Column [11] x (1 + 0.5 x Column [12]).
(9) Column [12] + Column [13].
(10) (Column [13] / (1 - Column [10])) + Column [12].
(11) Column [15] - Column [14].

Tampa Electric Company, Inc.
Derivation of Investment Risk Adjustment Based upon
Kroll Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAQ

Line No.		[1]		[2]	[3]	[4]
		Market Capitalization on December 29, 2023 (1) (millions)	(times larger)	Applicable Decile of the NYSE/AMEX/NASDAQ (2)	Applicable Size Premium (3)	Spread from Applicable Size Premium (4)
1.	<u>Tampa Electric Company, Inc. - based on the Utility Proxy Group</u>	\$ 8,984.120		3	0.57%	
2.	<u>Proxy Group of Fourteen Electric Utilities</u>	\$ 15,918.152	1.8 x	2	0.45%	0.12%
			[A]	[B]	[C]	[D]
			Decile	Market Capitalization of Smallest Company (millions)	Market Capitalization of Largest Company (millions)	Size Premium (Return in Excess of CAPM)*
		Largest	1	\$ 31,549.077	\$ 2,203,381.286	-0.26%
			2	12,372.885	31,316.513	0.45%
			3	5,918.981	12,323.854	0.57%
			4	3,770.176	5,916.017	0.58%
			5	2,365.425	3,769.877	0.93%
			6	1,389.851	2,365.076	1.16%
			7	789.019	1,389.118	1.37%
			8	377.076	782.383	1.18%
			9	218.389	373.879	2.15%
		Smallest	10	2.015	218.227	4.83%

*From 2023 Kroll Cost of Capital Navigator

Notes:

- (1) From page 2 of this Document.
- (2) Gleaned from Columns [B] and [C] on the bottom of this page. The appropriate decile (Column [A]) corresponds to the market capitalization of the proxy group, which is found in Column [1].
- (3) Corresponding risk premium to the decile is provided in Column [D] on the bottom of this page.
- (4) Line No. 1 Column [3] – Line No. 2 Column [3]. For example, the 0.12% in Column [4], Line No. 2 is derived as follows 0.12% = 0.57% - 0.45%.

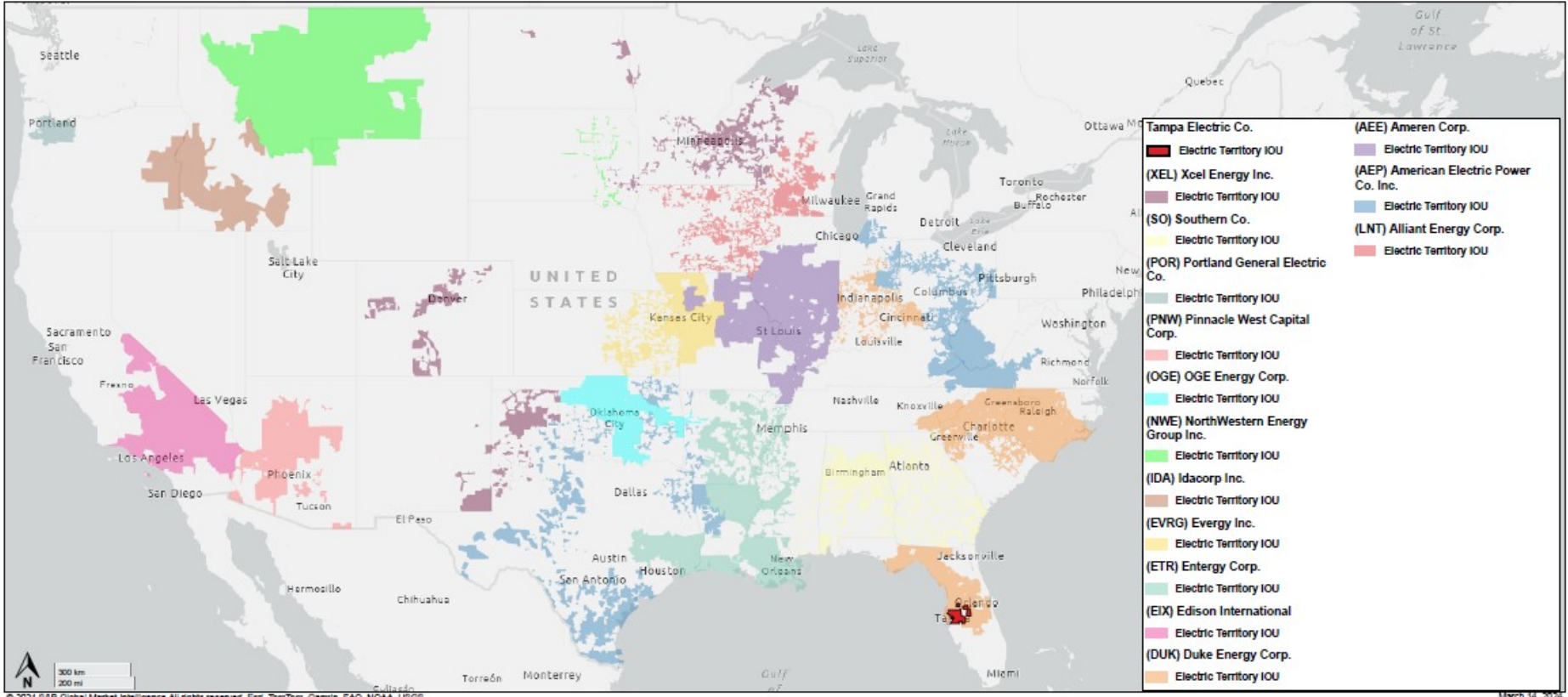
Tampa Electric Company, Inc.
Market Capitalization of Tampa Electric Company, Inc. and the
Utility Proxy Group

Company	Exchange	[1] Common Stock Shares Outstanding at Fiscal Year End 2022 (millions)	[2] Book Value per Share at Fiscal Year End 2022 (1)	[3] Total Common Equity at Fiscal Year End 2022 (millions)	[4] Closing Stock Market Price on December 29, 2023	[5] Market-to-Book Ratio on December 29, 2023 (2)	[6] Market Capitalization on December 29, 2023 (3) (millions)
Tampa Electric Company, Inc.		NA	NA	5,291.001 (4)	NA		
Based upon Proxy Group of Fourteen Electric Utilities							169.8 (5) \$ 8,984.120 (6)
<u>Proxy Group of Fourteen Electric Utilities</u>							
Alliant Energy Corporation	NASDAQ	251.135	\$ 24.99	\$ 6,276.00	\$ 51.30	205.3 %	\$ 12,883.224
Ameren Corporation	NYSE	262.000	\$ 40.11	\$ 10,508.00	\$ 72.34	180.4	18,953.08
American Electric Power Corporation	NASDAQ	513.866	\$ 46.50	\$ 23,893.40	\$ 81.22	174.7	41,736.20
Duke Energy Corporation	NYSE	770.000	\$ 61.51	\$ 47,360.00	\$ 97.04	157.8	74,720.80
Edison International	NYSE	382.208	\$ 35.70	\$ 13,643.00	\$ 71.49	200.3	27,324.09
Entergy Corporation	NYSE	211.177	\$ 61.40	\$ 12,966.99	\$ 101.19	164.8	21,368.95
Evergy, Inc.	NASDAQ	229.546	\$ 41.32	\$ 9,483.70	\$ 52.20	126.3	11,982.31
IDACORP, Inc.	NYSE	50.562	\$ 55.52	\$ 2,807.24	\$ 98.32	177.1	4,971.25
NorthWestern Corporation	NASDAQ	63.278	\$ 42.12	\$ 2,665.18	\$ 50.89	120.8	3,220.23
OGE Energy Corporation	NYSE	200.200	\$ 22.05	\$ 4,413.40	\$ 34.93	158.4	6,992.99
Pinnacle West Capital Corporation	NYSE	113.247	\$ 53.41	\$ 6,048.65	\$ 71.84	134.5	8,135.68
Portland General Electric Company	NYSE	89.283	\$ 31.13	\$ 2,779.00	\$ 43.34	139.2	3,869.54
Southern Company	NYSE	1,090.000	\$ 27.90	\$ 30,408.00	\$ 70.12	251.4	76,430.80
Xcel Energy Inc.	NASDAQ	549.578	\$ 30.34	\$ 16,675.00	\$ 61.91	204.0	34,024.38
Median		240.341	\$ 40.711	\$ 9,995.850	\$ 70.805	169.8 %	\$ 15,918.152

NA= Not Available

- Notes: (1) Column 3 / Column 1.
(2) Column 4 / Column 2.
(3) Column 1 * Column 4.
(4) Requested rate base multiplied by the requested common equity ratio.
(5) The market-to-book ratio of Tampa Electric Company, Inc. on December 29, 2023 is assumed to be equal to the market-to-book ratio of the Utility Proxy Group on December 29, 2023 as appropriate.
(6) Column [3] multiplied by Column [5].

Source of Information: 2022 Annual Forms 10K.
Finance.Yahoo.com.
Bloomberg Professional Services.



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DOCKET NO. 20240026-EI
 EXHIBIT NO. DWD-1
 WITNESS: D'ASCENDIS
 DOCUMENT NO. 11
 PAGE 1 OF 1
 FILED: 04/02/2024

Tampa Electric Company, Inc.
Analysis of Climate-Related Risks
Utility Proxy Group

Company	Average Risk Score	Area (Sq Mi) Weighted Average Risk Score
LNT	49.98	51.84
AEE	49.89	53.54
AEP	43.44	46.19
DUK	63.76	71.11
EIX	93.64	94.39
ETR	61.47	64.02
EVRG	45.56	46.22
IDA	44.08	46.58
NWE	35.95	32.56
OGE	60.22	59.83
PNW	83.70	83.30
POR	92.73	93.47
SO	52.24	57.51
XEL	49.49	49.13

Proxy Group Average	59.01	60.69
Proxy Group Median	51.11	55.53
TECO	98.96	98.81

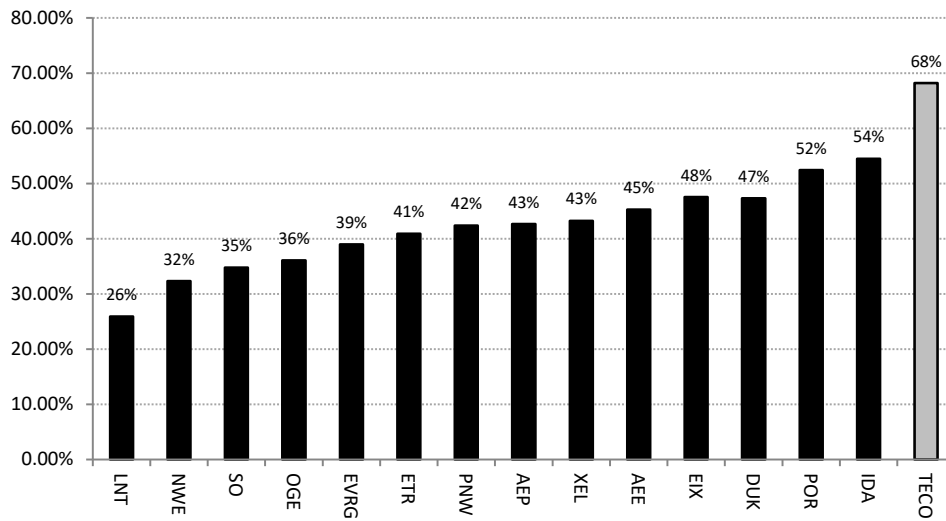
Sources:
S&P Capital IQ
Company Tariffs and Annual Filings
National Risk Index Database

National Risk Index Ranking Clusters

Risk Ranking	Risk Score	Number of Counties
Very High	99.55 - 100	15
Relatively High	95.45 - 99.52	129
Relatively Moderate	82.82 - 95.42	397
Relatively Low	48.11 - 82.79	1,091
Very Low	0.03 - 48.08	1,511
Total		3,143

Sources:
National Risk Index Database

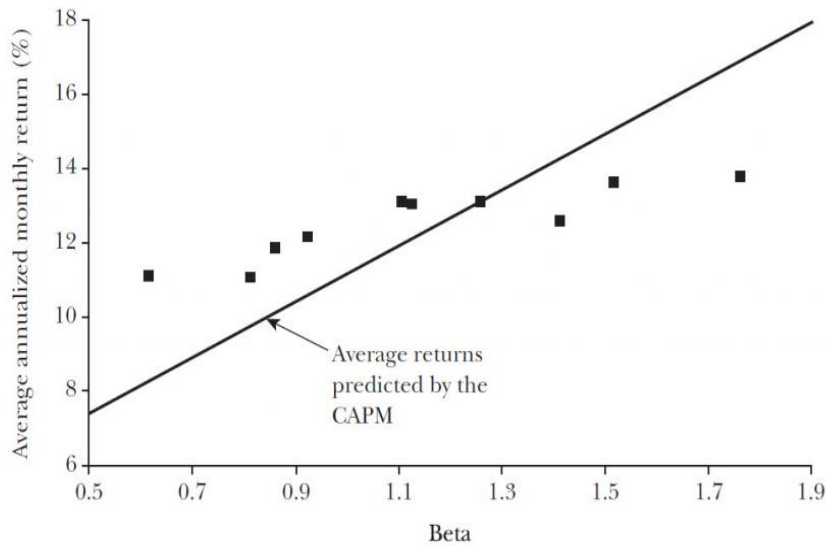
Tampa Electric Company, Inc.
Comparison of Projected Capital Expenditures Relative to Net Plant



Sources of Information: Value Line
Tampa Electric Company, Inc., 2022 FERC Form 1
Company Provided

Fama and French's Figure 2¹

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



¹ Eugene F. Fama and Kenneth R. French, *The Capital Asset Pricing Model: Theory and Evidence*, Journal of Economic Perspectives, Vol. 18, No. 3, Summer 2004 at 33 ("Fama & French").

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PREPARED DIRECT TESTIMONY
OF
DYLAN W. D'ASCENDIS

- 1 *Hope*, 320 U.S. 591 (1944), at 603.
- 2 Risk distinctions within S&P's bond rating categories are recognized by a 'plus' or 'minus', e.g., within the A category, an S&P rating can be an A+, A, or A-. Similarly, risk distinction for Moody's ratings are distinguished by numerical rating gradations, e.g., within the A category, a Moody's rating can be A1, A2 and A3.
- 3 See, Tampa Electric Company, SEC Form 10-K, at 5 (Dec. 31, 2023). The Company's operations include electricity sold at the wholesale level to municipalities, electric cooperative utilities, power marketers, and other load-serving entities.
- 4 Source: S&P Capital IQ.
- 5 See, Emera Incorporated, SEC Form 40-F, at 6-8 (Dec. 31, 2023).
- 6 Source: Tampa Electric Company, FERC Form 1.
- 7 Eugene F. Brigham and Joel F. Houston, Fundamentals of Financial Management, Concise 4th Ed., Thomson South-Western, 2004, at 574.
- 8 *In re: Petition for rate increase by Peoples*, Docket No. 080318-GU, Final Order Granting in Part and Denying in Part Petition for Rate Increase, at 12 (June 9, 2009).
- 9 *In re: Petition for rate increase by Peoples Gas System, Inc.*, Docket No. 20230023-GU, Order Granting in Part and Denying in Part Peoples Gas System, Inc.'s Petition for a Rate Increase, at 62-66, 71 (December 27, 2023).
- 10 See, SBBI - 2023, Appendix A Tables: Morningstar Stocks, Bonds, Bills, & Inflation 1926-2022.
- 11 See, SBBI - 2023, at 200-201.
- 12 Autoregressive conditional heteroscedasticity. See "A New Approach for Estimating the Equity Risk Premium for Public Utilities", Pauline M. Ahern, Frank J. Hanley and Richard A. Michelfelder, Ph.D. *The Journal of Regulatory Economics* (December 2011), 40:261-278.

13 www.nobelprize.org.

14 Data from January 1928 to December 2022 is from SBBI - 2023. Data from
January 2023 to December 2023 is from Bloomberg.

15 Annualized Return = $(1 + \text{Monthly Return})^{12} - 1$.

16 Shown on line 3, page 6 of Document No. 5.

17 www.nobelprize.org.

18 Robert Engle, "GARCH 101: The Use of ARCH/GARCH Models in Applied
Econometrics", *Journal of Economic Perspectives*, Volume 15, No. 4, Fall
2001, at 157-168.

19 Autoregressive Conditional Heteroskedasticity/Generalized
Autoregressive Conditional Heteroskedasticity.

20 In addition to Eviews,[®] the GARCH methodology can be applied and the
PRPM derived using other standard statistical software packages such as
SAS, RATS, S-Plus and JMulti, which are not cost-prohibitive. The
software that I used in this proceeding, Eviews,[®] currently costs \$600 -
\$700 for a single user commercial license. In addition, JMulti is a
free downloadable software with GARCH estimation applications.

21 Eugene A. Pilotte and Richard A. Michelfelder, "Treasury Bond Risk and
Return, the Implications for the Hedging of Consumption and Lessons for
Asset Pricing", *Journal of Economics and Business*, June 2011, 582-604.
and Richard A. Michelfelder, "Empirical Analysis of the Generalized
Consumption Asset Pricing Model: Estimating the Cost of Capital",
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22 Pauline M. Ahern, Frank J. Hanley, and Richard A. Michelfelder, "New
Approach to Estimating the Equity Risk Premium for Public Utilities",
The Journal of Regulatory Economics, December 2011, at 40:261-278.

23 Richard A. Michelfelder, Pauline M. Ahern, Dylan W. D'Ascendis, and
Frank J. Hanley, "Comparative Evaluation of the Predictive Risk Premium
Model, the Discounted Cash Flow Model and the Capital Asset Pricing
Model for Estimating the Cost of Common Equity", *The Electricity
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Ahern, and Dylan W. D'Ascendis, "Decoupling, Risk Impacts and the Cost
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24 Richard A. Michelfelder, Pauline M. Ahern, and Dylan W. D'Ascendis,
"Decoupling Impact and Public Utility Conservation Investment", *Energy
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25 PSC SC Docket No. 2017-292-WS - Order No. 2018-345, at 14. (May 17,
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26 NCUC Docket No. W-354, Sub 363, 364, 365, *Order Granting Partial Rate Increase and Requiring Customer Notice*, at PDF 72 (March 31, 2020).

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

28 Roger A. Morin, Modern Regulatory Finance, (2021) at 205-209 ("Morin").

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

30 Morin, at 207.

31 Morin, at 221.

32 Fama and French, at 32.

33 Fama and French, at 33.

34 Dianna R. Harrington, Modern Portfolio Theory & the Capital Asset Pricing Model - A User's Guide, Prentice-Hall, Inc. 1983, at 43-45.

35 Dianna R. Harrington, Modern Portfolio Theory & the Capital Asset Pricing Model - A User's Guide, Prentice-Hall, Inc. 1983, at 43-45.

36 See, SBBI - 2023, Appendix A-1 (1) through A-1 (3) and Appendix A-7 (19) through A-7 (21).

37 *Blue Chip Financial Forecasts*, December 1, 2023, at 14; and December 28, 2023, at 2.

38 *In re: Petition for rate increase by Peoples Gas System, Inc.*, Docket No. 20230023-GU, Order Granting in Part and Denying in Part Peoples Gas System, Inc.'s Petition for a Rate Increase, at 68 (December 27, 2023).

39 Morin, at 329.

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

41 Morin, at 337-339.

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

43 As shown on page 3 of Document No. 5.

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

49 See, S&P Global Ratings, RatingsDirect: Tampa Electric Co., June 15,
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50 FEMA defines Expected Annual Loss in the following way (see,
<https://hazards.fema.gov/nri/expected-annual-loss>):
Expected Annual Loss (EAL) represents the average economic
loss in dollars resulting from natural hazards each year.
It is calculated for each hazard type and quantifies loss
for relevant consequence types: buildings, people, and
agriculture.

As the natural hazards component of the National Risk
Index, an Expected Annual Loss score and rating represent a
community's relative level of expected losses each year
when compared to all other communities at the same level.
An Expected Annual Loss score is positively associated to a
community's risk; thus, a higher Expected Annual Loss score
results in a higher Risk Index score.

51 <https://www.ncei.noaa.gov/access/billions/>.

52 <https://www.ncei.noaa.gov/access/billions/>.

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Settlement Agreement, at 9-10.

55 Florida Public Service Commission, Order No. PSC-13-0443-FOF-EI, Docket
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58 S&P Global Ratings, RatingsDirect: Tampa Electric Co., June 15, 2023,
at 2.

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at 8.
- 60 Source: 2018 and 2022 FERC Form 1, at 301.
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- 62 Source: Tampa Electric Company, 2022 FERC Form 1, at 110.
- 63 Standard & Poor's, *Industry Report Card: Utility Sectors in the
Americas Remain Stable, While Challenges Beset European, Australian,
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- 64 Standard & Poor's, *Industry Top Trends 2017: Utilities*, *RatingsDirect*,
February 16, 2017, at 4.