STATE OF NEW HAMPSHIRE BEFORE THE PUBLIC UTILITIES COMMISSION

In the matter of

Aquarion Water Company of New Hampshire, Inc.

Docket No. DW 20-184

Petition for Permanent Rate Increase

DIRECT TESTIMONY

OF

Josie A. M. Gage Director of Economics and Finance Office of the Consumer Advocate

March 2, 2022

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1 I. INTRODUCTION

- 2 Q. Please state your name, business address and occupation.
- 3 A. My name is Josie A. M. Gage. My business address is 21 South Fruit Street, Suite
- 4 18, Concord, New Hampshire. I am employed as the Director of Economics and
- 5 Finance with the New Hampshire Office of the Consumer Advocate (OCA).
- 6 Q. Please summarize your education and professional experience.
- 7 A. I have an M.B.A. concentrated in Economics and Investments from Simmons
- 8 Graduate School of Management, which I earned in 2003. I have a B.S. in Business
- 9 Administration, which I earned in 1998 from Lasell University. I have attended
- both the New Mexico State University Center for Public Utilities, Practical
- 11 Regulatory Training in 2007, and the Institute of Public Utilities at Michigan State
- 12 University, Annual Utilities Studies Program in 2010.
- During the past fifteen years I have developed utility ratemaking expertise while
- at two utility commissions as an Analyst III and Economist III, as a Senior
- 15 Consultant, and currently as Director of Economics and Finance. I have
- participated in utility proceedings with respect to the electric, natural gas,
- telecommunications, water and transportation industries.
- Since September 2021, I have been the Director of Economics and Finance for the
- Office of the Consumer Advocate during which time I have been involved in five
- requests for new permanent rates, among several other rate related dockets.

Since November 2018, I have been an Independent Senior Consultant working with Reno Energy Consulting Services, LLC, Derry, N.H. providing research for several cases in New Mexico, Maryland, and Oklahoma. Prior to becoming a consultant, I served seven and a half years (January 2010 – May 2017) as an Economist III with the Commonwealth of Massachusetts, Department of Public Utilities, Rates and Revenue Requirements Division. During my tenure there I participated in over 50 cases related to utility ratemaking. Several of those were requests for new permanent rates in which my primary assignment was the company's capital structure, cost of debt, and return on equity.

Prior to working for the Commonwealth, I served three years (February 2007 – January 2010) at New Hampshire Public Utilities Commission (PUC) as a Utilities Analyst III in its Telecommunications Division. During those years I presented Telecommunications-related testimony before the PUC.

- 14 Q. Have you previously provided testimony before this Commission?
- 15 A. Yes.

- 16 II. PURPOSE AND RECOMMENDATIONS
- 17 Q. What is the purpose of your testimony?
- A. The purpose of my testimony is to provide the Commission with a recommended alternative to the Company's proposed capital structure and rate of return. My recommendation adheres to the standards in *Bluefield Water Works v. PSC*, 262 U.S. 679, 692-93 (1923) ("Bluefield") and *FPC v. Hope Natural Gas Co.*, 320 U.S. 591, 605 (1944) ("Hope"). In Bluefield and Hope, the U.S. Supreme Court established the

principle that a public utility may be allowed to earn a return comparable to a return on investments in other enterprises having similar risks that allow the utility, under efficient management, the opportunity to attract capital on reasonable terms and to maintain a satisfactory credit rating.

5 Q. How does the Company's proposed return on equity ("ROE") compare with your recommendation?

A.

The Company's witness, Mr. Dylan D'Ascendis, supports a weighted average cost of capital ("WACC") of 8.15 percent based on the Company's cost of long-term debt of 6.14 percent, a cost of short-term debt of 2.42 percent, a return on preferred stock of 6.00 percent, and an authorized ROE of 10.25 percent. The Company's capital structure is weighted 43.85 percent long-term debt, 3.79 percent short-term debt, 0.01 percent preferred stock, and equity representing 52.36 percent. Table 1 below depicts Mr. D'Ascendis' calculation of the Company's proposed capital structure and costs of capital.

Table 1: Cost of Capital Summary								
	[1]	[4]	[5]					
	Capital	Actual			Weighted			
	Element	Amounts	Ratio	Rate	Rate			
1	Long-term Debt	\$13,900,000	43.85%	6.14%	2.69%			
2	Short-term Debt	1,200,000	3.79%	2.42%	0.09%			
3	Preferred Stock	2,300	0.01%	6.00%	0.00%			
4	Equity	16,598,323	52.36%	10.25%	5.37%			
5	Total Capital	\$31,700,623	100.00%	WACC	8.15%			

Source data: Testimony of Dylan W. D'Ascendis, Att. DWD-1 and Company Sch. 4A.

I'm recommending that the PUC allow the Company a WACC of 7.41 percent and an authorized ROE of 8.84 percent. Table 2 below depicts my calculation of the Company's proposed capital structure and costs of capital.

Table 2: Cost of Capital Summary								
	[1]	[2]	[3]	[4]	[5]			
	Capital	Actual			Weighted			
	Element	Amounts	Ratio	Rate	Rate			
1	Long-term Debt	\$13,900,000	43.85%	6.14%	2.69%			
2	Short-term Debt	1,200,000	3.79%	2.42%	0.09%			
3	Preferred Stock	2,300	0.01%	6.00%	0.00%			
4	Equity	16,598,323	52.36%	8.84%	4.58%			
5	Total Capital	\$31,700,623	100.00%	WACC	7.41%			

Source data: Exhibit JAMG-2, and Company Sch. 4A.

5 Q. Please give a brief overview of the Company's operations.

Aquarion provides public drinking water supply to approximately 226,000 customer accounts or more than 700,000 people throughout its various New England service territories.¹ The Company is the largest investor-owned water utility in New England and thereby, in New Hampshire. Aquarion Water Company of New Hampshire is a subsidiary of Aquarion Water Company which is a subsidiary of Eversource. The Company's Pro Forma Operating Revenues as of December 31, 2019, were \$7,616,793 (Company Schedule No. 1A). The Company proposes to increase that number to \$8,990,143 via this rate case (Company Schedule No. 1A). Ninety-seven percent of the Company's Operating

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¹ https://www.aquarionwater.com/about

Revenues come from water-related operations. Aquarion Water Company enjoys a Standard & Poor's ("S&P") corporate credit rating of A- (Stable) and a Moody's corporate rating of Baa2 (stable).²

4 III. COUNTRY AND COMPANY ECONOMIC ENVIRONMENT

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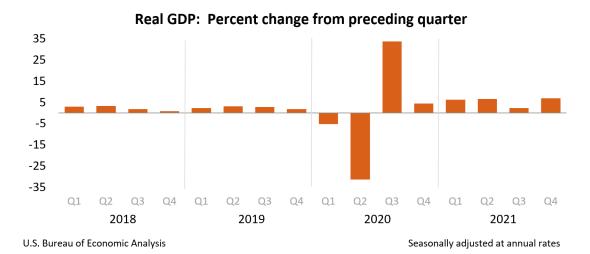
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5 Q. Please describe the current economic conditions under which this rate case 6 contemplates a return on rate base.

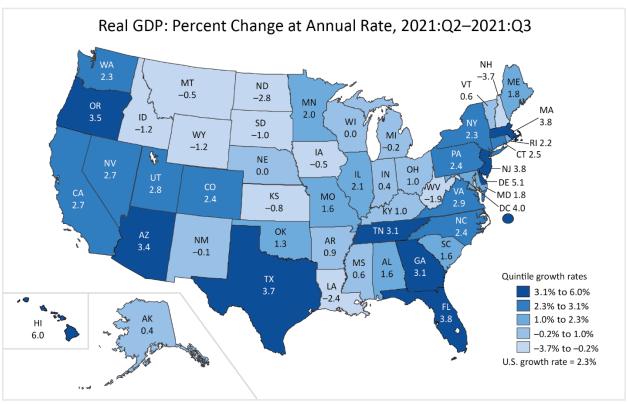
In order to grasp a picture of what investors expect in terms of returns from individual investments, a review of the economy as a whole is necessary. Investors take the economy into account when making investment decisions and a snapshot of the investing environment is essential to any model of returns expectations. An initial measure of the economy in general is Real GDP, which the U.S. Bureau of Economics presents in the chart below.³



² https://www.eversource.com/content/docs/default-source/investors/credit-ratings.pdf.

³ https://www.bea.gov/news/2022/gross-domestic-product-fourth-quarter-and-year-2021-advance-estimate

Analysts are generally lowering their GDP forecasts for 2022. S&P Global has reduced its GDP forecast from 4.1 percent to 3.9 percent,⁴ and Reuters reports that Goldman Sachs has also reduced its 2022 GDP forecast from 3.8 percent to 3.2 percent.⁵ Interestingly, and important to this case, is the fact that the Bureau of Economic Analysis at the U.S. Department of Commerce reports that New Hampshire, as of Q3 2021, is experiencing a *negative* 3.7 percent "growth" rate, the lowest in the nation.⁶



U.S. Bureau of Economic Analysis

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⁴ https://www.spglobal.com/ratings/en/research/articles/211129-economic-outlook-u-s-q1-2022-cruising-at-a-lower-altitude-12199021

⁵ https://www.reuters.com/world/us/goldman-sachs-cuts-2022-gdp-forecast-32-vs-38-consensus-2022-01-31/

⁶ https://www.bea.gov/news/2021/gross-domestic-product-state-3rd-quarter-2021

Inflationary pressures are at very high rates compared with pre-pandemic conditions. The Consumer Price Index as reported by the U.S. Bureau of Labor Statistics has risen considerably over the last year, considerably. According to the Bureau of Labor Statistics, "[t]he all items index rose 7.5 percent for the 12 months ending January, the largest 12-month increase since the period ending February 1982. The all items less food and energy index rose 6.0 percent, the largest 12-month change since the period ending August 1982. The energy index rose 27.0 percent over the last year, and the food index increased 7.0 percent."⁷
While the Bureau of Labor Statistics reports that the unemployment rate has moreor-less returned to near pre-pandemic levels,⁸ the number of people actively participating in the labor force has declined dramatically.⁹

⁷ https://www.bls.gov/news.release/cpi.nr0.htm

⁸ https://www.bls.gov/charts/employment-situation/civilian-unemployment-rate.htm

⁹ https://www.bls.gov/charts/employment-situation/civilian-labor-force-participation-rate.htm

Civilian unemployment rate, seasonally adjusted

Click and drag within the chart to zoom in on time periods



Hover over chart to view data.

Note: Shaded area represents recession, as determined by the National Bureau of Economic Research. Persons whose ethnicity is identified as Hispanic or Latino may be of any race.

Source: U.S. Bureau of Labor Statistics.



Civilian labor force participation rate, seasonally adjusted

Click and drag within the chart to zoom in on time periods



Hover over chart to view data.

Note: Shaded area represents recession, as determined by the National Bureau of Economic Research.

Persons whose ethnicity is identified as Hispanic or Latino may be of any race.

Source: U.S. Bureau of Labor Statistics.



Combining these economic indicators one can see that 2022 and 2023 will not be easy years for residential ratepayers. The January 7, 2022 Value Line Investment Survey reports in its Water Utility Industry analysis that "[e]quities in this group¹⁰ are known for their earnings predictability, good dividend growth, and low volatility. COVID-19 has not had a material impact on these companies, as the demand for water is relatively inelastic." I understand this inelasticity to mean that ratepayers will demand the same amount of water regardless of the rate they are charged for it. Further, the Value Line analysis states, "[i]nvestors are willing to accept a growth rate in earnings that is less than the typical corporation in return for the clear-cut profit prospects. Also, demand for water may vary sometimes, but generally doesn't change much. Indeed, the pandemic has not disrupted the water business in any meaningful way." 12

13 IV. CAPITAL STRUCTURE

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14 Q. What factors affect the Company's proposed capital structure?

15 A. Three components of the Company's proposed capital structure are potentially
16 problematic, among them an untimely cost of long-term debt, the inclusion of
17 short-term debt in the Company's proposed capital structure, and the inflation of
18 the Company's equity via last-minute contributions to capital.

Q. Please explain what you mean by an "untimely cost of long-term debt."

¹⁰ The exact same seven companies that comprise the proxy group selected by myself and Mr. D'Ascendis.

¹¹ https://www.valueline.com

¹² https://www.valueline.com

A. The Company's cost of long-term debt is a weighted average 6.14 percent as presented by the Company in its initial filing at Schedule 4D. As of December 31, 2019, the Company had three issuances with interest (cost rates) of 7.71, 6.47, and 4.70 percent. I am recommending that the Commission order the Company to refinance any of its long-term debt that has not already been refinanced since the filing of this rate case. All of these rates do not reflect the current rate of debt for a company with an S&P corporate credit rating of A- (Stable) and a Moody's corporate rating of Baa2 (stable). Additionally, this water company in particular is supported by the credit ratings and general access to credit of its parent 10 company, Eversource. As a company's cost of debt is borne by its ratepayers, every effort should be made on the part of Aquarion (and Eversource) to lower that cost to the lowest rate 12 available to the Company. 13 If a company were to purposefully allow an opportunity like those available in the current marketplace to pass without taking every advantage, shareholders should bear the burden of such mismanagement, not ratepayers. Additionally, there is the further issue of out-of-date debt costs buoying the Company's overall WACC. For simplicity's sake I have left the 6.14 percent cost of debt in my overall recommendation, however, this is quite high in today's financial environment. I urge the Commission to consider this as it attempts to maintain balance between ratepayers and shareholders' interests.

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Q. How is the inclusion of short-term debt in the Company's calculation of its 1 2 WACC problematic? A. It is uncommon for a company's short-term debt to be included in its capital 3 structure for ratemaking purposes. In order for a debt issuance to be included in 4 short-term debt, it typically should have a maturity of one year or less. Because of 5 the temporary nature of short-term debt, the Company need not file a financing 6 7 with the Commission and therefore the interest rate is generally unregulated. Traditionally, short term debt is not used to finance costs included in rate base. 8 Rather short-term debt is primarily used to finance construction and day-to-day 9 operations of the utility. 10 As the nature of short-term debt is temporary, and the Commission does not 11 review financing filings regarding short-term interest rates, a more typical 12 ratemaking treatment is to order utilities to include short-term debt in calculating 13 their allowance for funds used during construction ("AFUDC"). Interest costs 14 associated with short-term debt used for these purposes should be provided for 15 through the utility's AFUDC and working capital allowance, respectively. 16

For comparison purposes, I have left the Company's proposed short-term debt in my recommended overall WACC calculations. However, I also recommend that the Commission review its allowed practices where short-term debt is concerned. Further, I recommend the Commission consider instructing utilities to include short-term debt in their AFUDC calculations as a resolution to this fundamental capital structure related issue.

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Q. Why do you think the Company has an inflated equity portion of its capital structure and why could it be problematic?

When asked in discovery about its practices regarding significant and noticeable increases to its equity the Company responded that "[t]he increase to retained earnings represents the portion of rates we are collecting and retaining in order to reinvestment them into the system and continue to provide safe and reliable water." Company response to data request Joint Towns 1-3. It also responded to Joint Towns 1-2 that "[p]rior to the end of 2020, the Company had \$4,400,000 of short term inter company debt outstanding, an increase of \$3,200,000, or 267%, over the prior year. The Company's parent elected to transfer \$1.6 million of the inter company debt to capital contribution to achieve a more reasonable level of inter company debt of \$2,800,000 at December 31, 2020." (Emphasis added). (Joint Towns 1-2).

word to reinvest the funds into safe and reliable drinking water systems. Otherwise, they only serve to pad a company's earnings from its allowed ROE. *If* and only if a company reinvests the funds should it receive the reward of a higher proportion of its WACC attributable to return on equity. It is because of these facts that I am not recommending an alteration to the Company's equity portion of its proposed capital structure, rather I am recommending precise review of its capital reinvestments between rate cases to ensure ratepayers receive fair treatment.

V. PROXY GROUP SELECTION

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1 Q. Please explain your proxy group selection process.

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A.

following five tests: (1) the company will have an S&P investment grade credit rating; (2) the company will not have been involved in merger activity over the 12

Each of the selected companies included in the proxy group will have passed the

- 5 months preceding the assembly of the group; (3) the company will earn at least 70
- 6 percent of its operating revenues from water utility operations; (4) the company
- 7 must be included in Value Line's water industry group; and (5) the company must
- 8 be covered by an analyst at Yahoo! Finance, Bloomberg, Zacks, or MSN Money.
- 9 These tests resulted in my choice to include the following seven companies in my
- proxy group: American States Water Company (AWR), American Water Works
- 11 Company, Inc. (AWK), California Water Service Group (CWT), Essential Utilities,
- Inc. (WTRG), Middlesex Water Company (MSEX), SJW Group (SJW), and The
- 13 York Water Company (YORW). Observations of the companies' credit ratings and
- other basic financial data can be seen in Exhibit JAMG-1.
- 15 VI. RETURN ON EQUITY MODELING
- Q. Please explain your unique position regarding calculating a fair return on equity.
- 18 A. I now have the unique opportunity to both submit testimony as an expert witness
- on return on equity, after having advised decision makers on a rate of return that
- is fair, just and reasonable. While minor tweaks and adjustments were made over
- 21 the years by those decision makers, it was my recommendations that formed the
- basis of the final ROE decisions in former iterations of my career.

In my experience as a financial analyst and as a regulator who has reviewed and examined the testimonies of many return on equity expert witnesses, I have learned that the more the data is manipulated, the less it legitimately has to tell us about expectations of investors. Alternatively stated, the more we shift the methods we use to calculate a representative return to fit a given narrative, the more difficult it is to make effective decisions regarding a truly reflective return on equity.

- It is with this experience in mind that I calculate a single stage Discounted Cash Flow ("DCF") model and a traditional Capital Asset Pricing Model ("CAPM").
- 10 VII. RISK

- 11 Q. Please discuss the risks that a regulated water utility may contend with.
- 12 A. The expected return on an investment equates to a combined assessment of the 13 risk-free rate of return, inflation, business risk, financial risk, interest rate risk, and 14 regulatory risk.

Business risk, as perceived by investors, includes all the operating factors that increase the probability that expected future cash flows accruing to investors may not be realized. Business risk would include such factors as sales volatility and operating leverage. A utility's business risk is a function of such factors as customer base diversity, necessary capital expenditures, the regional and national economy, the regulatory environment in which it operates, and inflation. The risks associated with mixed economic signals, political uncertainty, and contentious

international relations are shared by all businesses and, as a result, are reflected in 1 the proxy group's calculated costs of equity. 2 Other examples of business risk, particularly for water utilities, include an aging 3 4 infrastructure and water supply challenges. These challenges are not unique to the Company as many water utilities face similar capital expenditures as they 5 upgrade and modernize existing facilities. 6 7 Financial risk relates to the capital structure of a company, including its fixed contractual obligations and ability to pay interest on its debt and refinance that 8 9 debt when due. The proxy group tests control for financial risk by including only 10 those companies with an investment grade credit rating. Credit rating agencies 11 assess the financial health of a company through the use of key financial ratios that measure the extent to which a company can pay its debt, including principal and 12 13 interest. 14 Interest rate risk is the risk that arises for bond owners from fluctuating interest rates, which depends on how sensitive its price is to interest rate changes in the 15 market. Its sensitivity depends on the bond's time to maturity and the coupon rate 16 of the bond. 17 Regulatory risk is based on the investor's perceived understanding of the current 18 regulatory environment along with possible changes to that regulatory 19 environment. How regulators treat regulatory lag is one example of regulatory 20 risk. To the extent that companies face a time lag between incurring expenses and 21 22 cost recovery, such risk is best measured by choosing a proxy group of companies

- that face similar regulatory oversight and earn the majority of their revenues from
- 2 regulated operations.
- 3 VIII. DISCOUNTED CASH FLOW MODEL
- 4 Q. Which DCF model are you using to derive an ROE for Aquarion?
- 5 A. I am engaging the constant growth version of the DCF model for my
- 6 recommendation of the Company's allowed cost of equity. In this version of the
- 7 DCF model the price of a stock today represents the discounted expected future
- 8 cash flows in the form of dividends. The price today is equal to the expected
- 9 dividends indefinitely, divided by the cost of equity minus the expected rate of
- growth for the company.

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$$P = D_1/(1+k)^1 + D_2/(1+k)^2 + \dots + D_n/(1+k)^n$$

- Where P is the stock price, D_1 , D_2 , D_n are the dividends indefinitely, and k is the
- cost of equity. In order to simplify the model, expected future dividends are
- represented by applying a constant growth rate to the current observable
- 15 dividend.

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$$P = D_1/(K-g)$$

- 17 And solving for K or the cost of equity,
- 18 $K = (D_1/P) + g$
- 19 Where,
- K = cost of equity
- D_1 = dividends over the upcoming period
- P =the price of the security

- g =the expected growth rate
- 2 Hence, the market rate for a given security is the expected dividend yield plus the
- 3 expected growth rate.

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4 Q. What is FERC's guidance on adjusting the dividend yield?

5 A. In its Order 61,234, FERC has given the following guidance with regard to the DCF 6 model dividend yield. "For ratemaking purposes, the Commission rearranges the DCF formula [by multiplying] ...the dividend yield by the expression (1+.5g) to 7 account for the fact that dividends are paid on a quarterly basis. Multiplying the 8 dividend yield by (1+.5g) increases the dividend yield by one half of the growth 9 rate and produces what the Commission refers to as the adjusted dividend yield. 10 The resulting formula is known as the constant growth DCF model and can be 11 expressed as k=D/P(1+.5g)+g."13 I have opted to follow this guidance with regard 12 to Aquarion. 13

Q. What factors have you brought together in your Constant Growth DCF?

A. A summary of my DCF model is provided in Exhibit JAMG-3. I have calculated a dividend yield for the next 12-month period using the current dividend yield and the expected growth rates. (Exhibits JAMG-4, JAMG-5, and JAMG-6). For the dividend yield, I use the current annual dividend and both a 90-day average stock price, and a 180-day average stock price. (Exhibits JAMG-5, and JAMG-6). I use both analysts' five-year estimates of Earnings Per Share ("EPS") (which can be

¹³ https://www.ferc.gov/sites/default/files/2020-04/E-7 2.pdf

found at JAMG-5), and a combination of EPS, Dividends per Share ("DPS"), and Book Value Per Share ("BVPS") projected 5 years forward. (Exhibits JAMG-5, and JAMG-6). Combining these estimates adds stability to the model by tempering earnings growth rates which are less stable than DPS, for example.

I utilized the published growth-rate forecasts provided by Yahoo! Finance and Value Line. I would have like to also incorporate Zacks forecast data, but most of the companies in the proxy group are not covered by Zacks. I believe Zacks may have dropped coverage of some of the proxy group companies between this writing and Mr. D'Ascendis' filing his testimony.

Results of my DCF model can be summarized as follows:

Constant Growth DCF Summary Results									
	[1]	[2]	[3]	[4]					
				180-Day					
		90-Day Stock	180-Day	Stock Price					
	90-Day Stock	Price Avg. &	Stock Price	Avg. & Est.					
	Price Avg. &	Est. EPS,	Avg. & Est.	EPS, DPS,					
1	Est. EPS	DPS, BVPS	EPS	BVPS					
2	9.76%	8.74%	9.88%	8.79%					

From this table one can observe the stability derived from adding DPS and BVPS to the model.

14 IX. CAPITAL ASSET PRICING MODEL

A.

15 Q. Please describe the CAPM are you utilizing to derive an ROE for Aquarion.

The CAPM assumes that investors require a premium for holding an equity security over that of a debt security. For bearing the extra burden of risk they expect an additional return. In this model the cost of equity is equal to the sum of

- a risk-free rate of return (aka a bond rate) and a risk premium for holding the
- equity (stock). One can envision the equation thusly:
- $K = R_f + RP$
- 4 However, in order to include both the market risk and the risk specific to a given
- 5 company, we add the company's beta to the equation and solve for the cost of
- 6 equity:
- 7 $K = R_f + \beta * (R_m R_f)$
- 8 Where,
- 9 K =the cost of equity
- R_f = the risk free rate of return
- β = the volatility of a security relative to the market, or the investment risk that
- cannot be eliminated by diversifying one's portfolio
- R_m = the expected risk of the market as a whole
- Typically, the yield on long-term U.S. Treasury Bonds is used to represent the risk-
- free rate of return.
- The beta coefficient is a measure of non-diversifiable or systematic risk. It
- measures the movement of an asset's return in response to shifts in the market as
- a whole. The market as a whole is represented by a beta of 1.0. If a company's
- beta coefficient is more than 1.0 the stock is more volatile and therefore riskier than
- 20 the market. If the beta is between 0.0 and 1.0 the company's stock is less volatile
- 21 than the market and its returns will be proportional. For example, a company with
- a beta of .45 will earn a return of 45 percent of the return on the whole market.

The expected return on the market or the market risk premium is more challenging to represent, but several finance professionals and firms offer estimates of this premium.

4 Q. What inputs did you include in your CAPM?

A. As of the date of this writing, the 30-day average of the 30-year Treasury Yield was 2.19. (Exhibit JAMG-8). Beta coefficients are available from Value Line and I have utilized these as they are an industry standard. (Exhibit JAMG-9). As for the expected return on the market, I have combined advice from A. Damodaran, Duff and Phelps, now renamed Kroll, and KPMG Corporate Finance NL. (Exhibit JAMG-10, Attachment-1, and Attachment-2). In Exhibit JAMG-10, I have provided a visual chart of Damodaran's data, which reflects a 5.17 percent equity risk premium. At the point in time of this writing, analysts are processing 2021 data and Duff and Phelps has not yet updated their December 7, 2020, equity risk premium estimate of 5.50 percent (Attachment-1). However, KPMG has released its updated analysis as of December 31, 2021, with an equity market risk premium of 5.0 percent (Attachment-2). Exhibit JAMG-7 summarizes my CAPM analysis, which results in a 6.19 percent return on equity for the Company.

Q. What value do you place on your model results?

A. I place more weight on my DCF-derived results because it is widely used by both the finance community and public utility commissions and yields more reliable results. It is a forward-looking model that directly incorporates investors' expectations of company dividend income through market pricing signals,

1 particularly in the case of utility stocks where stock valuations are telling a

2 different story than the general market.

The CAPM model, in contrast, is largely reliant on financial market outcomes

complicated by monetary policy and near historically low interest rates. These

low interest rates have persisted many years longer than anticipated. Although

recent and planned activity by the Federal Reserve may result in increases in short-

term interest rates, such shifts in monetary policy may not lead to increases in

long-term interest rates. However, I rely on my CAPM results as a reasonableness

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10 Q. What return on equity are you recommending for Aquarion?

11 A. It is my recommendation that the Commission take into account the investing

environment in which Aquarion's ROE will be set. Therefore, I am choosing the

DCF model results for its stability, and I am choosing the version that includes the

largest data sets and collects the most information. In light of these, I recommend

a return on equity for Aquarion of 8.84 percent.

16 Q. Does this conclude your testimony?

17 A. Yes it does. However, I reserve the right to supplement my testimony as new

information becomes available.

Exhibits & Attachments

	Water Utility Proxy Group								
Column									
/Line	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	
			Value Line	Value Line	Value Line Financial	Standard & Poor's	Moody's Investors	Value Line Common	
1	Company Name	Ticker Symbol	Beta**	Safety Rank**	Strength**	Rating Service*	Service*	Equity Ratio**	
2	American States Water Company	AWR	0.65	2	A	A+	_	54.5%	
3	American Water Works Company, Inc.	AWK	0.85	3	B++	A	Baa1	40.0%	
4	California Water Service Group	CWT	0.70	3	B++	A+	_	51.5%	
5	Essential Utilities, Inc.	WTRG	0.95	3	B+	A	Baa2	47.0%	
6	Middlesex Water Company	MSEX	0.70	2	B++	A	_	57.5%	
7	SJW Group	SJW	0.80	3	B+	A-	_	43.0%	
8	The York Water Company	YORW	0.85	3	B+	A-	_	55.5%	
9									

^{*} Sourced from each company's SEC filings and investor relations documents and webpages

^{**} January 7, 2022 Value Line Company Sheets

Exhibit JAMG-2 Page 1 of 1

	Aquarion's Capital Structure & Recommended Rate of Return								
Column									
/Line	[1]		[2]	[3]	[4]	[5]			
1	Capital Element	Actual Amounts*		Ratio	Rate**	Weighted Rate			
2	Long-term Debt	\$	13,900,000.00	43.85%	6.14%		2.69%		
3	Short-term Debt	\$	1,200,000.00	3.79%	2.42%		0.09%		
4	Preferred Stock	\$	2,300.00	0.01%	6.00%		0.00%		
5	Equity	\$	16,598,323.00	52.36%	8.84%		4.63%		
6	Total Capital	\$	31,700,623.00	100.00%	WACC***		7.41 %		
7				=					
8	* Company's Schedules	s 2A, Pa	age 1; Bates 56	1					
9	** Company's Schedule		-		31-583				
10	***Weighted Average C	Cost of C	Capital						
11			_						
12			Aquarion	's Equity Struct	ure*				
13	Common Stock	\$	2,187,075.00						
14	Paid in Capital	\$	3,557,940.00						
15	Contributed Capital	\$	2,480,250.00						
16	Ratained Earnings	\$	8,373,058.00						
17	Total Equity	\$	16,598,323.00	-					
18				-					
19	* Company's Schedule 2	2A, Pag	ge 1; Bates 561						

Exhibit JAMG-3

Page 1 of 1

	Discounted Cash Flow Model	Results
Column		
/Line	[1]	[2]
1	Discounted Cash Flow Elements	
2	Dividend Yield	1.59%
3	FERC Recommended Growth Adjustment	1.02625
4		1.64%
5	Growth Rate	7.20%
6	Return on Equity	8.84%
7		
8	Discounted Cash Flow Form	nulae
9		
10	Typical DCF Model	$k = D_1/P + g$
11		
12	DCF Model with FERC Growth Adjustment	$k = D_1/P(1+.5g) + g$

Proxy Group Dividend Yield Analysis

Colum	1							
n/Line	[1]	[2] Ticker	[3] Dividend	[4] Dividend	[5] Dividend	[6] Dividend	[7]	[8]
1	Company Name	Symbol	Yield	Yield 30-	Yield 90-	Yield 180-	Median	
2	American States Water Company	AWR	1.64%	1.55%	1.47%	1.51%	1.53%	
3	American Water Works Company,	AWK	1.59%	1.50%	1.39%	1.36%	1.44%	
4	California Water Service Group	CWT	1.57%	1.52%	1.41%	1.45%	1.49%	
5	Essential Utilities, Inc.	WTRG	2.30%	2.19%	2.10%	2.14%	2.16%	
6	Middlesex Water Company	MSEX	1.15%	1.15%	1.06%	1.05%	1.10%	
7	SJW Group	SJW	2.11%	2.03%	1.97%	1.98%	2.00%	
8	The York Water Company	YORW	1.78%	1.72%	1.63%	1.61%	1.68%	
9						Mean	1.63%	
10						Median	1.53%	
11								
12	Divi	dend Yield	= Annual Div	idends Per Sl	hare / Price P	er Share		
13	Company	AWR	AWK	CWT	WTRG	MSEX	SJW	YORW
14	Most Recent Annualized Dividends	1.40	2.36	0.92	1.04	1.11	1.36	0.76
15	2/14/2022 Closing Stock Price**	\$85.56	\$148.03	\$58.47	\$45.12	\$96.51	\$64.35	\$42.59
16	30-Day Average Closing Stock Price	\$90.03	\$157.38	\$60.57	\$47.59	\$98.66	\$67.14	\$44.18
17	90-Day Average Closing Stock Price	\$95.42	\$170.18	\$65.23	\$49.58	\$105.16	\$69.01	\$46.57
18 19	180-Day Average Closing Stock Pri	\$92.69	\$173.13	\$63.30	\$48.56	\$105.90	\$68.74	\$47.20

^{*} January 7, 2022 Value Line Company Sheets
** Yahoo! Finance reported closing stock price as of the date listed

				Constant	Growth DCF, Ex	cpected EPS Grow	th Method					
Column												
/Line	[1]	[2]	[3]	[4]	[5]	[6]	[7] Expected	[8] Yahoo!	[9] Value Line	[10] Avg. Exp.	[11]	[12]
			90-Day Stock		DPS 2022	Dividend Yield	Dividend Yield	Projected EPS	Projected	Earnings	DCF	
1	Company Name	Ticker Symbol	Price Avg.	DPS 2021	=[4]*(1+[10])	=[4]/[3]	=[5]/[3]	(5 Years)	EPS (5 Years)	Growth Rate	=[7]+[10]	
2	American States Water Company	AWR	\$95.42	1.40	1.49	1.47	1.56	6.70%	6.50%	6.60%	8.16%	
3	American Water Works Company, Inc.	AWK	\$170.18	2.36	2.56	1.39	1.50	8.20%	8.50%	8.35%	9.85%	
4	California Water Service Group	CWT	\$65.23	0.92	1.01	1.41	1.55	11.70%	8.50%	10.10%	11.65%	
5	Essential Utilities, Inc.	WTRG	\$49.58	1.04	1.13	2.10	2.27	6.40%	10.00%	8.20%	10.47%	
6	Middlesex Water Company	MSEX	\$105.16	1.11	1.15	1.06	1.10	2.70%	5.00%	3.85%	4.95%	
7	SJW Group	SJW	\$69.01	1.36	1.50	1.97	2.17	5.70%	15.00%	10.35%	12.52%	
8	The York Water Company	YORW	\$46.57	0.76	0.80	1.63	1.73	4.90%	6.50%	5.70%	7.43%	
9		Mean	\$85.88	1.28	1.38	1.57	1.70	6.61%	8.57%	7.59%	9.29%	
10		Median	\$69.01	1.11	1.15	1.47	1.56	6.40%	8.50%	8.20%	9.76%	
4.4												
11												
11 12			Co	nstant Growth	DCF, Expected I	EPS, DPS, and BV	PS Growth Meth	od				
			Co	nstant Growth	DCF, Expected I	EPS, DPS, and BV			Value Line	Value Line	Avg. Exp.	
				nstant Growth	•		Expected	Avg. Exp.	Expected	Expected	Growth Rate	
12			90-Day Stock		DPS 2022	Dividend Yield	Expected Dividend Yield	Avg. Exp. Earnings	Expected DPS Growth	Expected BVPS Growth	Growth Rate (EPS, DPS,	DCF
12	Company Name	Ticker Symbol	90-Day Stock Price Avg.	DPS 2021	DPS 2022 =[4]*(1+[10])	Dividend Yield =[4]/[3]	Expected Dividend Yield =[5]/[3]	Avg. Exp. Earnings Growth Rate	Expected DPS Growth (5 Years)	Expected BVPS Growth (5 Years)	Growth Rate (EPS, DPS, BVPS)	=[7]+[11]
12 13 14	American States Water Company	Ticker Symbol AWR	90-Day Stock Price Avg. \$95.42	DPS 2021 1.40	DPS 2022 =[4]*(1+[10]) 1.48	Dividend Yield =[4]/[3] 1.47	Expected Dividend Yield =[5]/[3] 1.55	Avg. Exp. Earnings Growth Rate 6.60%	Expected DPS Growth (5 Years) 9.50%	Expected BVPS Growth (5 Years) 5.50%	Growth Rate (EPS, DPS, BVPS) 7.20%	=[7]+[11] 8.75%
12 13 14 15	American States Water Company American Water Works Company, Inc.	Ticker Symbol AWR AWK	90-Day Stock Price Avg. \$95.42 \$170.18	DPS 2021 1.40 2.36	DPS 2022 =[4]*(1+[10]) 1.48 2.48	Dividend Yield =[4]/[3] 1.47 1.39	Expected Dividend Yield =[5]/[3] 1.55 1.46	Avg. Exp. Earnings Growth Rate 6.60% 8.35%	Expected DPS Growth (5 Years) 9.50% 8.50%	Expected BVPS Growth (5 Years) 5.50% 5.00%	Growth Rate (EPS, DPS, BVPS) 7.20% 7.28%	=[7]+[11] 8.75% 8.74%
13 14 15 16	American States Water Company American Water Works Company, Inc. California Water Service Group	Ticker Symbol AWR AWK CWT	90-Day Stock Price Avg. \$95.42 \$170.18 \$65.23	DPS 2021 1.40 2.36 0.92	DPS 2022 =[4]*(1+[10]) 1.48 2.48 0.97	Dividend Yield =[4]/[3] 1.47 1.39 1.41	Expected Dividend Yield =[5]/[3] 1.55 1.46 1.49	Avg. Exp. Earnings Growth Rate 6.60% 8.35% 10.10%	Expected DPS Growth (5 Years) 9.50% 8.50% 6.50%	Expected BVPS Growth (5 Years) 5.50% 5.00% 5.50%	Growth Rate (EPS, DPS, BVPS) 7.20% 7.28% 7.37%	=[7]+[11] 8.75% 8.74% 8.85%
13 14 15 16 17	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc.	AWR AWK CWT WTRG	90-Day Stock Price Avg. \$95.42 \$170.18 \$65.23 \$49.58	DPS 2021 1.40 2.36 0.92 1.04	DPS 2022 =[4]*(1+[10]) 1.48 2.48 0.97 1.11	Dividend Yield =[4]/[3] 1.47 1.39 1.41 2.10	Expected Dividend Yield =[5]/[3] 1.55 1.46 1.49 2.23	Avg. Exp. Earnings Growth Rate 6.60% 8.35% 10.10% 8.20%	Expected DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50%	Expected BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50%	Growth Rate (EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40%	=[7]+[11] 8.75% 8.74% 8.85% 9.63%
13 14 15 16 17 18	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc. Middlesex Water Company	AWR AWK CWT WTRG MSEX	90-Day Stock Price Avg. \$95.42 \$170.18 \$65.23 \$49.58 \$105.16	DPS 2021 1.40 2.36 0.92 1.04 1.11	DPS 2022 =[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15	Dividend Yield =[4]/[3] 1.47 1.39 1.41 2.10 1.06	Expected Dividend Yield =[5]/[3] 1.55 1.46 1.49 2.23 1.09	Avg. Exp. Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85%	Expected DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 5.50%	Expected BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50%	Growth Rate (EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28%	=[7]+[11] 8.75% 8.74% 8.85% 9.63% 5.38%
13 14 15 16 17 18 19	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc. Middlesex Water Company SJW Group	AWR AWK CWT WTRG MSEX SJW	90-Day Stock Price Avg. \$95.42 \$170.18 \$65.23 \$49.58 \$105.16 \$69.01	DPS 2021 1.40 2.36 0.92 1.04 1.11 1.36	DPS 2022 =[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15 1.42	Dividend Yield =[4]/[3] 1.47 1.39 1.41 2.10 1.06 1.97	Expected Dividend Yield =[5]/[3] 1.55 1.46 1.49 2.23 1.09 2.06	Avg. Exp. Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85% 10.35%	Expected DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 5.50% 6.00%	Expected BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50% 4.50%	Growth Rate (EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28% 6.95%	=[7]+[11] 8.75% 8.74% 8.85% 9.63% 5.38% 9.01%
13 14 15 16 17 18 19 20	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc. Middlesex Water Company	AWR AWK CWT WTRG MSEX SJW YORW	90-Day Stock Price Avg. \$95.42 \$170.18 \$65.23 \$49.58 \$105.16 \$69.01 \$46.57	DPS 2021 1.40 2.36 0.92 1.04 1.11 1.36 0.76	DPS 2022 =[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15 1.42 0.79	Dividend Yield =[4]/[3] 1.47 1.39 1.41 2.10 1.06 1.97 1.63	Expected Dividend Yield =[5]/[3] 1.55 1.46 1.49 2.23 1.09 2.06 1.70	Avg. Exp. Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85% 10.35% 5.70%	Expected DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 6.00% 6.00%	Expected BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50% 4.50% 4.00%	Growth Rate (EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28% 6.95% 5.23%	=[7]+[11] 8.75% 8.74% 8.85% 9.63% 5.38% 9.01% 6.93%
13 14 15 16 17 18	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc. Middlesex Water Company SJW Group	AWR AWK CWT WTRG MSEX SJW	90-Day Stock Price Avg. \$95.42 \$170.18 \$65.23 \$49.58 \$105.16 \$69.01	DPS 2021 1.40 2.36 0.92 1.04 1.11 1.36	DPS 2022 =[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15 1.42	Dividend Yield =[4]/[3] 1.47 1.39 1.41 2.10 1.06 1.97	Expected Dividend Yield =[5]/[3] 1.55 1.46 1.49 2.23 1.09 2.06	Avg. Exp. Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85% 10.35%	Expected DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 5.50% 6.00%	Expected BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50% 4.50%	Growth Rate (EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28% 6.95%	=[7]+[11] 8.75% 8.74% 8.85% 9.63% 5.38% 9.01%

				Constant	Growth DCF, Ex	pected EPS Grow	th Method					
Column												
/Line	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]
							Expected	Yahoo!	Value Line	Avg. Exp.		
	6 V		180-Day Stock	DDC 2024	DPS 2022		Dividend Yield	,	Projected	Earnings	DCF	
1	Company Name	Ticker Symbol	Price Avg.	DPS 2021	=[4]*(1+[10])	=[4]/[3]	=[5]/[3]	(5 Years)	EPS (5 Years)	Growth Rate	=[7]+[10]	
2	American States Water Company	AWR	\$92.69	1.40	1.49	1.51	1.61	6.70%	6.50%	6.60%	8.21%	
3	American Water Works Company, Inc.	AWK	\$173.13	2.36	2.56	1.36	1.48	8.20%	8.50%	8.35%	9.83%	
4	California Water Service Group	CWT	\$63.30	0.92	1.01	1.45	1.60	11.70%	8.50%	10.10%	11.70%	
5	Essential Utilities, Inc.	WTRG	\$48.56	1.04	1.13	2.14	2.32	6.40%	10.00%	8.20%	10.52%	
6	Middlesex Water Company	MSEX	\$105.90	1.11	1.15	1.05	1.09	2.70%	5.00%	3.85%	4.94%	
7	SJW Group	SJW	\$68.74	1.36	1.50	1.98	2.18	5.70%	15.00%	10.35%	12.53%	
8	The York Water Company	YORW	\$47.20	0.76	0.80	1.61	1.70	4.90%	6.50%	5.70%	7.40%	
9		Mean	\$85.64	1.28	1.38	1.59	1.71	6.61%	8.57%	7.59%	9.30%	
10		Median	\$80.71	1.24	1.32	1.48	1.61	6.55%	8.50%	8.28%	9.88%	
11												
12			Cor	nstant Growth	DCF, Expected I	PS, DPS, and BVI	PS Growth Metho	od				
									Value Line	Value Line	Avg. Exp.	
				Expected Avg. Exp. Expected Expected Growth Rate								
								0 1				
13			180-Day Stock		DPS 2022	Dividend Yield	Dividend Yield	Earnings	DPS Growth	BVPS Growth	(EPS, DPS,	DCF
	Company Name	Ticker Symbol	Price Avg.	DPS 2021	=[4]*(1+[10])	=[4]/[3]	Dividend Yield =[5]/[3]	Earnings Growth Rate	DPS Growth (5 Years)	BVPS Growth (5 Years)	(EPS, DPS, BVPS)	=[7]+[11]
14	American States Water Company	Ticker Symbol AWR	Price Avg. \$92.69	1.40	=[4]*(1+[10]) 1.48	=[4]/[3] 1.51	Dividend Yield =[5]/[3] 1.59	Earnings Growth Rate 6.60%	DPS Growth (5 Years) 9.50%	BVPS Growth (5 Years) 5.50%	(EPS, DPS, BVPS) 7.20%	=[7]+[11] 8.79%
	American States Water Company American Water Works Company, Inc.	Ticker Symbol AWR AWK	Price Avg. \$92.69 \$173.13	1.40 2.36	=[4]*(1+[10]) 1.48 2.48	=[4]/[3] 1.51 1.36	Dividend Yield =[5]/[3] 1.59 1.43	Earnings Growth Rate 6.60% 8.35%	DPS Growth (5 Years) 9.50% 8.50%	BVPS Growth (5 Years) 5.50% 5.00%	(EPS, DPS, BVPS) 7.20% 7.28%	=[7]+[11] 8.79% 8.71%
14	American States Water Company American Water Works Company, Inc. California Water Service Group	Ticker Symbol AWR AWK CWT	Price Avg. \$92.69 \$173.13 \$63.30	1.40 2.36 0.92	=[4]*(1+[10]) 1.48 2.48 0.97	=[4]/[3] 1.51 1.36 1.45	Dividend Yield =[5]/[3] 1.59 1.43 1.53	Earnings Growth Rate 6.60% 8.35% 10.10%	DPS Growth (5 Years) 9.50% 8.50% 6.50%	BVPS Growth (5 Years) 5.50% 5.00% 5.50%	(EPS, DPS, BVPS) 7.20% 7.28% 7.37%	=[7]+[11] 8.79% 8.71% 8.90%
14 15	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc.	AWR AWK CWT WTRG	\$92.69 \$173.13 \$63.30 \$48.56	1.40 2.36 0.92 1.04	=[4]*(1+[10]) 1.48 2.48 0.97 1.11	=[4]/[3] 1.51 1.36 1.45 2.14	Dividend Yield =[5]/[3] 1.59 1.43 1.53 2.28	Earnings Growth Rate 6.60% 8.35% 10.10% 8.20%	DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50%	BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50%	(EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40%	=[7]+[11] 8.79% 8.71% 8.90% 9.68%
14 15 16 17 18	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc. Middlesex Water Company	AWR AWK AWK CWT WTRG MSEX	\$92.69 \$173.13 \$63.30 \$48.56 \$105.90	1.40 2.36 0.92 1.04 1.11	=[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15	=[4 <i>y</i> [3] 1.51 1.36 1.45 2.14 1.05	Dividend Yield =[5]/[3] 1.59 1.43 1.53 2.28 1.08	Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85%	DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 5.50%	BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50%	(EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28%	=[7]+[11] 8.79% 8.71% 8.90% 9.68% 5.37%
14 15 16 17	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc.	AWR AWK CWT WTRG MSEX SJW	92.69 \$173.13 \$63.30 \$48.56 \$105.90 \$68.74	1.40 2.36 0.92 1.04 1.11 1.36	=[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15 1.42	=[4]/[3] 1.51 1.36 1.45 2.14 1.05 1.98	Dividend Yield =[5]/[3] 1.59 1.43 1.53 2.28 1.08 2.07	Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85% 10.35%	DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 5.50% 6.00%	BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50% 4.50%	(EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28% 6.95%	=[7]+[11] 8.79% 8.71% 8.90% 9.68% 5.37% 9.02%
14 15 16 17 18 19 20	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc. Middlesex Water Company	AWR AWK CWT WTRG MSEX SJW YORW	Price Avg. \$92.69 \$173.13 \$63.30 \$48.56 \$105.90 \$68.74 \$47.20	1.40 2.36 0.92 1.04 1.11 1.36 0.76	=[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15 1.42 0.79	=[4]/[3] 1.51 1.36 1.45 2.14 1.05 1.98 1.61	Dividend Yield =[5]/[3] 1.59 1.43 1.53 2.28 1.08 2.07 1.67	Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85% 10.35% 5.70%	DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 6.00% 6.00%	BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50% 4.50% 4.00%	(EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28% 6.95% 5.23%	=[7]+[11] 8.79% 8.71% 8.90% 9.68% 5.37% 9.02% 6.91%
14 15 16 17 18 19	American States Water Company American Water Works Company, Inc. California Water Service Group Essential Utilities, Inc. Middlesex Water Company SJW Group	AWR AWK CWT WTRG MSEX SJW	92.69 \$173.13 \$63.30 \$48.56 \$105.90 \$68.74	1.40 2.36 0.92 1.04 1.11 1.36	=[4]*(1+[10]) 1.48 2.48 0.97 1.11 1.15 1.42	=[4]/[3] 1.51 1.36 1.45 2.14 1.05 1.98	Dividend Yield =[5]/[3] 1.59 1.43 1.53 2.28 1.08 2.07	Earnings Growth Rate 6.60% 8.35% 10.10% 8.20% 3.85% 10.35%	DPS Growth (5 Years) 9.50% 8.50% 6.50% 7.50% 5.50% 6.00%	BVPS Growth (5 Years) 5.50% 5.00% 5.50% 6.50% 3.50% 4.50%	(EPS, DPS, BVPS) 7.20% 7.28% 7.37% 7.40% 4.28% 6.95%	=[7]+[11] 8.79% 8.71% 8.90% 9.68% 5.37% 9.02%

	Capital Asset Pricing I	Model
Column		
/Line	[1]	[2]
1	CAPM Elements	
2	Risk Free Rate of Return	2.19 %
3	Beta	0.80
4	Equity Market Risk Premium	5.00 %
5		4.00
6		
7	Return on Equity	6.19 %
8		
9	Capital Asset Pricing Mode	l Formulae
10		
11	Basis of the CAPM	$k = R_f + RP$
12		
13	Complete CAPM Formula	$k = (R_f) + \beta x [E(R_m) - (R_f)]$

Risk Free Rate of Return



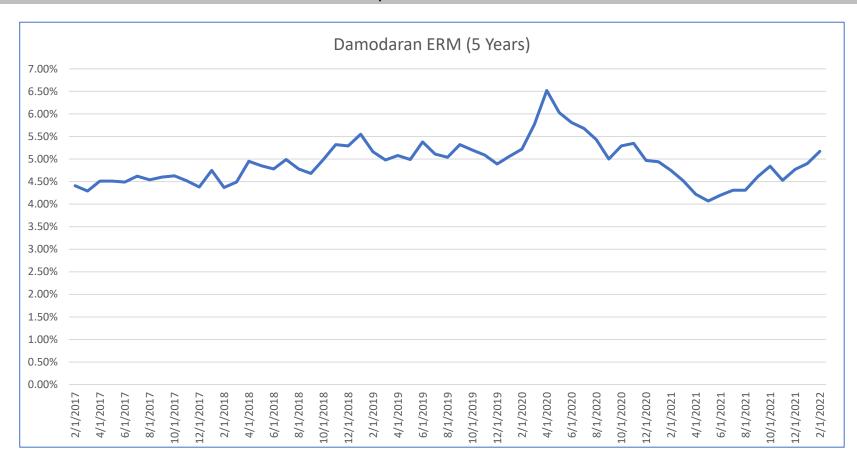
Source: https://fred.stlouisfed.org/series/DGS30

30-Day Average Yield: 2.19

Exhibit JAMG-9 Page 1 of 1

			1 466 1 01 1
	Proxy Group	Betas	
Column/I	_		
ine	[1]	[2]	[3]
			Value Line
1	Company Name	Ticker Symbol	Beta*
2	American States Water Company	AWR	0.65
3	American Water Works Company, Inc.	AWK	0.85
4	California Water Service Group	CWT	0.70
5	Essential Utilities, Inc.	WTRG	0.95
6	Middlesex Water Company	MSEX	0.70
7	SJW Group	SJW	0.80
8	The York Water Company	YORW	0.85
9		Median	0.80
10			
11	* January 7, 2022 Value Line Company She	ets	

Charted Expected Return on the Market



Source: http://pages.stern.nyu.edu/~adamodar/

B ((0 B) ...



Table: Equity Risk Premium & Risk-free Rates

Duff & Phelps Recommended U.S. Equity Risk Premium (ERP) and Corresponding Risk-free Rates (R_f) ; January 2008–Present

For additional information, please visit https://www.duffandphelps.com/insights/publications/cost-of-capital

Date	Risk-free Rate (R _f)	R _f (%)	Duff & Phelps Recommended ERP (%)	What Changed
Current Guidance:				
December 7, 2020 - UNTIL FURTHER NOTICE	Normalized 20-year U.S. Treasury yield	2.50	5.50	ERP
June 30, 2020 - December 6, 2020	Normalized 20-year U.S. Treasury yield	2.50	6.00	Rf
March 25, 2020 - June 29, 2020	Normalized 20-year U.S. Treasury yield	3.00	6.00	ERP
December 19, 2019 - March 24, 2020	Normalized 20-year U.S. Treasury yield	3.00	5.00	ERP
September 30, 2019 - December 18, 2019	Normalized 20-year U.S. Treasury yield	3.00	5.50	R_f
December 31, 2018 - September 29, 2019	Normalized 20-year U.S. Treasury yield	3.50	5.50	ERP
September 5, 2017 - December 30, 2018	Normalized 20-year U.S. Treasury yield	3.50	5.00	ERP
November 15, 2016 - September 4, 2017	Normalized 20-year U.S. Treasury yield	3.50	5.50	R_f
January 31, 2016 - November 14, 2016	Normalized 20-year U.S. Treasury yield	4.00	5.50	ERP
December 31, 2015	Normalized 20-year U.S. Treasury yield	4.00	5.00	
December 31, 2014	Normalized 20-year U.S. Treasury yield	4.00	5.00	
December 31, 2013	Normalized 20-year U.S. Treasury yield	4.00	5.00	
February 28, 2013 – January 30, 2016	Normalized 20-year U.S. Treasury yield	4.00	5.00	ERP
December 31, 2012	Normalized 20-year U.S. Treasury yield	4.00	5.50	
January 15, 2012 - February 27, 2013	Normalized 20-year U.S. Treasury yield	4.00	5.50	ERP
December 31, 2011	Normalized 20-year U.S. Treasury yield	4.00	6.00	
September 30, 2011 - January 14, 2012	Normalized 20-year U.S. Treasury yield	4.00	6.00	ERP
July 1 2011 - September 29, 2011	Normalized 20-year U.S. Treasury yield	4.00	5.50	R _f
June 1, 2011 - June 30, 2011	Spot 20-year U.S. Treasury yield	Spot	5.50	R _f
May 1, 2011 - May 31, 2011	Normalized 20-year U.S. Treasury yield	4.00	5.50	R _f
December 31, 2010	Spot 20-year U.S. Treasury yield	Spot	5.50	
December 1, 2010 - April 30, 2011	Spot 20-year U.S. Treasury yield	Spot	5.50	R _f
June 1, 2010 - November 30, 2010	Normalized 20-year U.S. Treasury yield	4.00	5.50	R_f
December 31, 2009	Spot 20-year U.S. Treasury yield	Spot	5.50	
December 1, 2009 - May 31, 2010	Spot 20-year U.S. Treasury yield	Spot	5.50	ERP
June 1, 2009 - November 30, 2009	Spot 20-year U.S. Treasury yield	Spot	6.00	R_f
December 31, 2008	Normalized 20-year U.S. Treasury yield	4.50	6.00	
November 1, 2008 - May 31, 2009	Normalized 20-year U.S. Treasury yield	4.50	6.00	R_f
October 27, 2008 - October 31, 2008	Spot 20-year U.S. Treasury yield	Spot	6.00	ERP
January 1, 2008 - October 26, 2008	Spot 20-year U.S. Treasury yield	Spot	5.00	Initialized

[&]quot;Normalized" in this context means that in months where the risk-free rate is deemed to be abnormally low, a proxy for a longer-term sustainable risk-free rate is used.

To learn more about cost of capital issues, and to ensure that you are using the most recent Duff & Phelps Recommended ERP, visit www.duffandphelps.com/insights/publications/cost-of-capital.

This and other related resources can also be found in the online Cost of Capital Navigator platform. To learn more about the Cost of Capital Navigator and other Duff & Phelps valuation and industry data products, visit www.DPCostofCapital.com.



We recommend a MRP of 5.0% as per 31 December 2021

If you are reading this, it is likely that you are in regular contact with KPMG Corporate Finance & Valuations ("KPMG Corporate Finance NL") on the topic of valuations. The goal of this document is to provide a summary to our business partners about our recent observations and conclusions regarding one of the key valuation parameters, the equity market risk premium.

We recommend the use of an equity market risk premium ("MRP") of 5.0% as per 31 December 2021. Between the third and fourth quarter of 2021 we have observed higher stock prices, albeit combined with increased volatility. Over the same period, both the forecasted growth outlooks and risk-free rates have remained relatively constant when compared to 30 September 2021. As a result of these developments, we maintain our MRP at 5.0%, in line with the MRP as per the third quarter of 2021.

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Introduction - valuation and discount rates



The discount rate is an important input parameter to any valuation based on the discounted cash flow methodology ("DCF"). All else equal, a higher discount rate will lead to a lower asset value and vice versa.

In this document, we will specifically focus on the derivation of the cost of equity for company valuations. This discount rate can either be directly applied to equity cash flow forecasts of a company or it can be used in conjunction with the cost of debt and a certain financing structure to derive the weighted average cost of capital ("WACC").

A general DCF model can be expressed by the following formula:

Present value =
$$\frac{CF_1}{(1+k)^1} + \frac{CF_2}{(1+k)^2} + \frac{CF_3}{(1+k)^3} + \dots = \sum_{t=1}^{\infty} \frac{CF_t}{(1+k)^t}$$

Present value = value of the analysed asset (e.g. a company) cash flow that the asset will generate in period t

asset-specific discount rate



Discount rate derivation

While there are several ways to derive discount rates, the most commonly applied methodology is the 'build-up methodology' based on the Capital Asset Pricing Model ("CAPM"). This methodology builds up the discount rate by summation of several asset-related risk components in order to derive a return at which investors are willing to invest in this asset (e.g. a company).

The build-up of the cost of equity ("k") of a company can be expressed as:

$$k = rfr + \beta \times MRP + \alpha$$

required return on equity

risk-free rate

a company's systematic risk market or equity risk premium

asset-specific risk factors

The function and derivation of the individual discount rate parameters are briefly discussed on the following slide.



Introduction - discount rate parameters



Risk-free rate

The risk-free rate forms the basis for any discount rate estimation using the build-up methodology. As the name implies, this rate should not take into account any risk factors and should only include two general components:

- The time value of money; and
- Inflation.

Since there are no investments that are truly risk-free, the risk-free rate is commonly approximated by reference to the yield on long-term debt instruments issued by presumably financially healthy governments (e.g. AAA-rated government bonds with a maturity of 30 years).



Beta measures how the returns of a certain company behave in relation to the returns of the relevant market benchmark.

A beta greater/smaller than 1.0 means that the share price of a company is more/less volatile than the general market and therefore investors will require a higher/lower return to compensate for this volatility.



Alpha is an asset-specific adjustment factor that may need to be applied for a number of different reasons. If a financial forecast does not account for certain operational risks, it may be appropriate to include a forecast risk premium. Other examples of alpha adjustments are size premia and illiquidity premia.

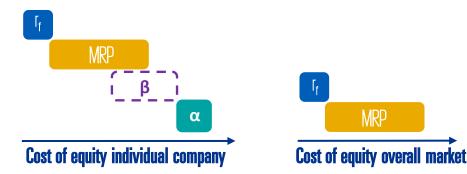


Equity market risk premium (MRP)

The MRP is the average return that investors require over the risk-free rate for accepting the higher variability in returns that are common for equity investments (i.e. the MRP reflects a minimum threshold on top of the risk-free rate for investors in order to be willing to invest).

Since alpha only relates to company-specific adjustments, it can be omitted if considering the overall market (alpha = 0). Furthermore it is important to note that for the overall market, beta will by definition always be 1.0, since the sum of all returns of individual stocks equals the overall return of the market, and therefore, the two are perfectly correlated.

As the figure below shows, the required return for the overall market is defined entirely by the risk-free rate and the MRP.





Measurement of the equity market risk premium - methodologies



Implied equity market risk premium

The general DCF formula discussed earlier can be used to solve for the implied discount rate that reconciles these parameters.

Deducting the risk-free rate from this implied discount rate will yield an implied MRP.

The implied MRP methodology is to some extent sensitive to input assumptions and careful consideration must be given to:

- The selection of income proxies (e.g. dividends, buy-backs, cash flow);
- The basis of expected growth rates (e.g. macroeconomic considerations, analyst forecasts); and
- The trade-off between outcome stability and current relevance with regards to certain historical inputs (e.g. dividend yield normalisations, pay-out ratios).

KPMG Corporate Finance, a division of KPMG Advisory N.V. ("KPMG Corporate Finance"), continuously inspects if enhancements in applying the above input assumptions are necessary for the current MRP method in order to accurately reflect the current market dynamics.

We deem the implied MRP methodology the most appropriate methodology in order to derive changes in the MRP as a result of the financial crisis, because it incorporates recent market developments, expectations, and it can be logically deduced from observable market data.



X Historical observation methodology

This methodology assumes that the expected MRP can be derived by studying historical equity returns.

While this methodology is well established and theoretically sound, it does not allow for the incorporation of the most recent market developments.



There are a number of other prominent methodologies which may lead to additional insights, the most common being:

- The multi-factor model:
- The yield spread build-up; and
- The survey approach.

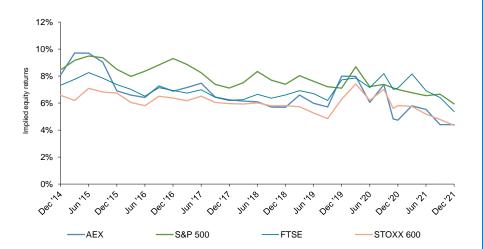
While each of these methodologies offers some unique advantages, the application of these methodologies involves similar trade-offs as the ones between the historical and the implied MRP methodology.



Development of discount rates



The graph below illustrates the movement in the implied equity returns for a number of major equity markets over time. From this graph it can be observed that the implied equity returns of the markets included have either remained relatively stable (i.e. AEX and STOXX 600) or have experienced a (slight) decrease (i.e. FTSE and S&P500) since 30 September 2021.

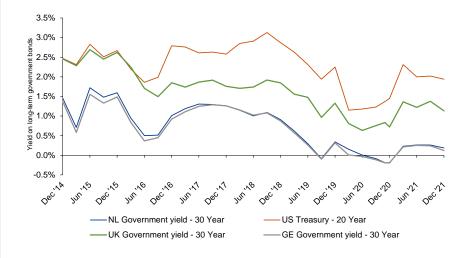




Yield on long-term bonds

In the graph below, the interest rate movements for a number of highly developed markets (Netherlands, UK, Germany and US) are displayed.

From this graph it can be observed that the long term yields of the German and Dutch government bonds, and the US Treasury bond have remained relatively constant and that the yields of the UK government bond have decreased slightly compared to 30 September 2021.

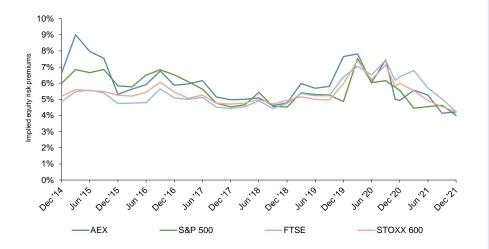




Equity market risk premium as per 30 September 2021: 5.0%



In our current update we observe relatively constant or slight decreases in MRP estimates compared to 30 September 2021. This is driven by slightly lower implied equity returns, but relatively constant risk-free rates.





Equity market risk premium KPMG Corporate Finance

Based on the analyses set out in this report we conclude that the markets included in our study (with more weight given to the S&P 500, FTSE and STOXX 600), show relatively constant or slightly lower implied premiums compared to 30 September 2021. Therefore, KPMG Corporate Finance NL recommends the use of a MRP of **5.0%** as per 31 December 2021.

We note that our estimation is based on information available as at 31 December 2021. Developments in the market after 31 December 2021 are not reflected in the MRP estimate as at 31 December 2021.



Considerations

In order to assess the reasonableness of the outcomes of our implied MRP study, we have considered various other methodologies as previously described. To the extent that these methodologies are valid to derive insights about the current level of the MRP, these methodologies have confirmed our findings.

Based on our research and professional judgement we consider the outcome of our study to represent a global MRP. However, when calculating a discount rate for a specific valuation purpose, consideration must be given to (amongst others):

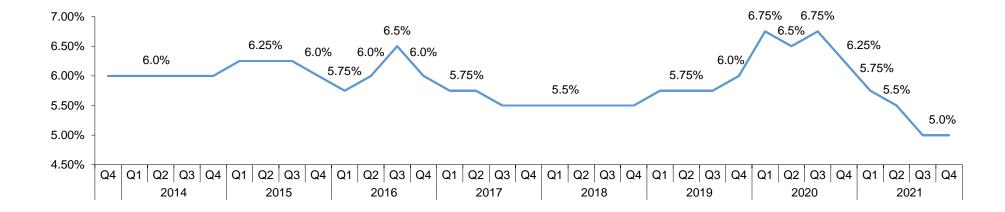
- The basis for the applied risk-free rate;
- The applicable country risk premium; and
- Expected differences in inflationary outlook.

We highlight that the individual input parameters used in the determination of the discount rate should never be viewed in isolation.





Please find an overview of the historic MRP estimates by KPMG Corporate Finance NL in the graph below.











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