

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>KENTUCKY UTILITIES COMPANY FOR AN</b>	)	<b>CASE NO. 2025-00113</b>
<b>ADJUSTMENT OF ITS ELECTRIC RATES</b>	)	
<b>AND APPROVAL OF CERTAIN</b>	)	
<b>REGULATORY AND ACCOUNTING</b>	)	
<b>TREATMENTS</b>	)	

**In the Matter of:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>LOUISVILLE GAS AND ELECTRIC</b>	)	<b>CASE NO. 2025-00114</b>
<b>COMPANY FOR AN ADJUSTMENT OF ITS</b>	)	
<b>ELECTRIC AND GAS RATES, AND</b>	)	
<b>APPROVAL OF CERTAIN REGULATORY</b>	)	
<b>AND ACCOUNTING TREATMENTS</b>	)	

**DIRECT TESTIMONY OF DYLAN W. D'ASCENDIS**

**RATE OF RETURN**

May 30, 2025

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1 **I. INTRODUCTION AND PURPOSE**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Dylan W. D'Ascendis. My business address is 1820 Chapel Avenue W., Suite  
4 300, Cherry Hill, NJ 08003.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am a Partner at ScottMadden, Inc.

7 **Q. PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE AND**  
8 **EDUCATIONAL BACKGROUND.**

9 A. I have offered expert testimony on behalf of investor-owned utilities in over 40 state  
10 regulatory commissions in the United States, the Federal Energy Regulatory Commission,  
11 the National Energy Regulator in Canada, the Alberta Utility Commission, one American  
12 Arbitration Association panel, and the Superior Court of Rhode Island on issues including,  
13 but not limited to, common equity cost rate, rate of return, valuation, capital structure, class  
14 cost of service, and rate design.

15 On behalf of the American Gas Association ("AGA"), I calculate the AGA Gas  
16 Index, which serves as the benchmark against which the performance of the American Gas  
17 Index Fund ("AGIF") is measured on a monthly basis. The AGA Gas Index and AGIF are  
18 a market capitalization-weighted index and mutual fund, respectively, comprised of the  
19 common stocks of the publicly traded corporate members of the AGA.

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

1 I am also a member of the National Association of Certified Valuation Analysts  
2 (“NACVA”) and was awarded the professional designation “Certified Valuation Analyst”  
3 by the NACVA in 2015.

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

8 The details of my educational background and expert witness appearances are  
9 included in Appendix A.

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THESE PROCEEDINGS?**

11 A. The purpose of my testimony is to present evidence and provide a recommendation  
12 regarding the electric and natural gas operations of Louisville Gas and Electric Company  
13 (“LGE”) and the electric operations of Kentucky Utilities Company (“KU” or the  
14 “Companies”) return on common equity (“ROE”) to be used for ratemaking purposes in  
15 these proceedings.

16 **Q. HAVE YOU PREPARED EXHIBITS IN SUPPORT OF YOUR DIRECT**  
17 **TESTIMONY?**

18 A. Yes, I have. I prepared Exhibits DWD-1 through DWD-12, which were prepared by me or  
19 under my direct supervision.

20 **Q. WHAT IS YOUR RECOMMENDED ROE FOR LGE AND KU?**

21 A. I recommend that the Kentucky Public Service Commission (“KY PSC” or the  
22 “Commission”) authorize LGE’s electric and natural gas operations and KU’s electric  
23 operations the opportunity to earn an ROE of 10.95% on its jurisdictional rate base. The

1 ratemaking capital structure and debt cost rates are sponsored by Company Witness  
2 Burgos.

3 **II. SUMMARY OF TESTIMONY**

4 **Q. PLEASE SUMMARIZE YOUR RECOMMENDED COMMON EQUITY COST**  
5 **RATE.**

6 A. My recommended common equity cost rate of 10.95% is summarized on pages 1 and 2 of  
7 Exhibit DWD-1. I have assessed the market-based common equity cost rates of companies  
8 of relatively similar, but not necessarily identical, risk to LGE and KU. Using companies  
9 of relatively comparable risk as proxies is consistent with the principles of fair rate of return  
10 established in the *Hope*<sup>1</sup> and *Bluefield*<sup>2</sup> decisions. No proxy group can be identical in risk  
11 to any single company. Consequently, there must be an evaluation of relative risk between  
12 the Company and the proxy group to determine if it is appropriate to adjust the proxy  
13 group's indicated rate of return.

14 My recommendation results from the application of several cost of common equity  
15 models, specifically the Discounted Cash Flow ("DCF") model, the Risk Premium Model  
16 ("RPM"), and the Capital Asset Pricing Model ("CAPM"), to the market data of a proxy  
17 group of seven natural gas utilities ("Natural Gas Utility Proxy Group") and 15 vertically  
18 integrated electric utilities ("Electric Utility Proxy Group") whose selection criteria will be  
19 discussed below. In addition, I applied these same models to proxy groups of 49 and 47  
20 domestic, non-price regulated companies comparable in total risk to the Natural Gas Utility  
21 Proxy Group and the Electric Utility Proxy Group ("Non-Price Regulated Proxy Groups").  
22 The results derived from each are as follows:

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

<sup>2</sup> *Bluefield Water Works Improvement Co. v. Public Serv. Comm'n*, 262 U.S. 679 (1923) ("*Bluefield*").

**Table 1: Summary of Common Equity Cost Rates**

	<u>Louisville Gas &amp; Electric</u>		<u>Kentucky Utilities</u>
	<u>Gas Proxy Group</u>	<u>Electric Proxy Group</u>	<u>Electric Proxy Group</u>
Discounted Cash Flow Model	10.29%	10.32%	10.32%
Risk Premium Model	10.86%	10.79%	10.79%
Capital Asset Pricing Model	11.12%	10.75%	10.75%
Market Models Applied to Comparable Risk, Non-Price Regulated Companies	<u>11.92%</u>	<u>11.84%</u>	<u>11.84%</u>
Indicated Range of Common Equity Cost Rates Before Adjustments for Company-Specific Risk	10.29% - 11.92%	10.32% - 11.84%	10.32% - 11.84%
Size Adjustment	0.15%	0.10%	0.05%
Credit Risk Adjustment	0.00%	-0.07%	-0.07%
Flotation Cost Adjustment	<u>0.15%</u>	<u>0.15%</u>	<u>0.15%</u>
Indicated Range of Common Equity Cost Rates after Adjustment	<u>10.59% – 12.22%</u>	<u>10.51% – 12.03%</u>	<u>10.46% – 11.97%</u>
Recommended Cost of Common Equity	<u>10.95%</u>	<u>10.95%</u>	<u>10.95%</u>

2

3           The indicated ranges of common equity cost rates applicable to the Natural Gas  
4           Utility Proxy Group and the Electric Utility Proxy Group are between 10.29% and 11.92%  
5           and 10.32% and 11.84%, respectively, before any Company-specific adjustments.<sup>3</sup>

6           To reflect LGE and KU's specific risks, I then adjusted the indicated common  
7           equity cost rate model results to reflect the Companies' smaller relative size and respective  
8           bond ratings, as compared to the Natural Gas and Electric Utility Proxy Groups. I also  
9           adjusted the indicated ranges of common equity cost rates upward to reflect flotation costs.

10          These adjustments resulted in a Company-specific indicated range of common equity cost

<sup>3</sup>           The indicated range of ROEs applicable to the Natural Gas Utility Proxy Group excluding the Predictive Risk Premium Model ("PRPM") before adjustments is 10.29% to 11.91%. The indicated range of ROEs applicable to the Electric Utility Proxy Group excluding the PRPM before adjustments is 10.32% to 11.83%.

1 rates between 10.59% and 12.22% based on the Natural Gas Utility Proxy Group and  
2 10.46% and 11.98% (KU) and 10.51% and 12.03% (LGE) based on the Electric Utility  
3 Proxy Group. From those Company-specific ranges of ROEs I recommend the  
4 Commission adopt an ROE of 10.95% for ratemaking purposes for both LGE's electric and  
5 natural gas operations and KU's electric operations.

6 **Q. HOW IS THE REMAINDER OF YOUR DIRECT TESTIMONY ORGANIZED?**

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

- 8 • Section III – Provides a summary of financial theory and regulatory principles pertinent  
9 to the development of the cost of common equity;
- 10 • Section IV – Explains my selection of the Utility Proxy Group used to develop my  
11 analytical results;
- 12 • Section V – Describes the analyses on which my recommendation is based;
- 13 • Section VI – Summarizes my common equity cost rate before adjustments to reflect  
14 Company-specific factors;
- 15 • Section VII – Explains my adjustments to my common equity cost rate to reflect  
16 Company-specific factors;
- 17 • Section VIII – Presents other considerations relevant to the cost of common equity; and  
18 • Section IX – Presents my conclusions.

19 **III. GENERAL PRINCIPLES**

20 **Q. WHAT GENERAL PRINCIPLES HAVE YOU CONSIDERED IN ARRIVING AT**  
21 **YOUR RECOMMENDED COMMON EQUITY COST RATE OF 10.95%?**

22 A. In unregulated industries, marketplace competition is the principal determinant of the price  
23 of products or services. For regulated public utilities, regulation must act as a substitute  
24 for marketplace competition. Assuring that the utility can fulfill its obligations to the

1 public, while providing safe and reliable service, requires a level of earnings sufficient to  
2 maintain the integrity of presently invested capital. Sufficient earnings also permit the  
3 attraction of needed new capital at a reasonable cost, for which the utility must compete  
4 with other firms of comparable risk, consistent with the fair rate of return standards  
5 established by the U.S. Supreme Court in the previously cited *Hope* and *Bluefield* cases.

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

8 The rate-making process under the Act, *i.e.*, the fixing of ‘just and  
9 reasonable’ rates, involves a balancing of the investor and the consumer  
10 interests. Thus we stated in the Natural Gas Pipeline Co. case that  
11 ‘regulation does not insure that the business shall produce net revenues.’  
12 315 U.S. at page 590, 62 S.Ct. at page 745. But such considerations aside,  
13 the investor interest has a legitimate concern with the financial integrity of  
14 the company whose rates are being regulated. From the investor or  
15 company point of view it is important that there be enough revenue not only  
16 for operating expenses but also for the capital costs of the business. These  
17 include service on the debt and dividends on the stock. Cf. *Chicago &*  
18 *Grand Trunk R. Co. v. Wellman*, 143 U.S. 339, 345, 346 12 S.Ct. 400,402.  
19 By that standard the return to the equity owner should be commensurate  
20 with returns on investments in other enterprises having corresponding risks.  
21 That return, moreover, should be sufficient to assure confidence in the  
22 financial integrity of the enterprise, so as to maintain its credit and to attract  
23 capital.<sup>4</sup>

24 In summary, the U.S. Supreme Court has found a return that is adequate to attract  
25 capital at reasonable terms enables the utility to provide service while maintaining its  
26 financial integrity. As discussed above, and in keeping with established regulatory  
27 standards, that return should be commensurate with the returns expected elsewhere for  
28 investments of equivalent risk. The Commission’s decision in these proceedings,  
29 therefore, should provide the Company with the opportunity to earn a return that is: (1)  
30 adequate to attract capital at reasonable cost and terms; (2) sufficient to ensure the

<sup>4</sup> *Hope*, 320 U.S. 591 (1944), at 603.

1 Company's financial integrity; and (3) commensurate with returns on investments in  
2 enterprises having corresponding risks.

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

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

18 It therefore is important that the authorized ROE reflects the risks and prospects of  
19 the utility's operations and supports the utility's financial integrity from a stand-alone  
20 perspective as measured by their combined business and financial risks. Consequently, the  
21 ROE authorized in these proceedings should be sufficient to support the operational (i.e.,  
22 business risk) and financing (i.e., financial risk) of the Companies' utility operations on a  
23 stand-alone basis.

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

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

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

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

17          The cost of debt is contractually defined and can be directly observed as the interest  
18       rate or yield on debt securities. However, the cost of equity is not directly observable and  
19       must be estimated based on market data and various financial models. Because the cost of  
20       equity is premised on opportunity costs, the models used to determine it are typically  
21       applied to a group of “comparable” or “proxy” companies.

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

1 **Q. IS THE AUTHORIZED RETURN SET IN REGULATORY PROCEEDINGS**  
2 **GUARENTEED?**

3 A. No, it is not. Consistent with the *Hope* and *Bluefield* standards, the ratemaking process  
4 should provide the utility a reasonable opportunity to recover its return of, and return on,  
5 its reasonably incurred investments, but it does not guarantee that return. While a utility  
6 may have control over some factors that affect the ability to earn its authorized return (e.g.,  
7 management performance, operating and maintenance expenses, etc.), there are several  
8 factors beyond a utility's control that affect its ability to earn its authorized return. Those  
9 may include factors such as weather, the economy, and the prevalence and magnitude of  
10 regulatory lag.

11 **A. Business Risk**

12 **Q. PLEASE DEFINE BUSINESS RISK AND EXPLAIN WHY IT IS IMPORTANT**  
13 **FOR DETERMINING A FAIR RATE OF RETURN.**

14 A. The investor-required return on common equity reflects investors' assessment of the total  
15 investment risk of the subject firm. Total investment risk is often discussed in the context  
16 of business and financial risk.<sup>5</sup>

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

22 Examples of business risks generally faced by utilities include, but are not limited  
23 to, the regulatory environment, pipeline safety requirements, mandatory environmental

<sup>5</sup> As will be discussed later in this testimony, another definition of total risk is systematic risk plus unsystematic risk.

1 compliance requirements, customer mix and concentration of customers, service territory  
2 economic growth, market demand, risks and uncertainties of supply, operations, capital  
3 intensity, size, the degree of operating leverage, and the like, all of which have a direct  
4 bearing on earnings.

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

11 For regulated utilities, business risks are both long-term and near-term in nature.  
12 Whereas near-term business risks are reflected in year-to-year variability in earnings and  
13 cash flow brought about by economic or regulatory factors, long-term business risks reflect  
14 the prospect of an impaired ability of investors to obtain both a fair rate of return on, and  
15 return of, their capital. Moreover, because utilities accept the obligation to provide safe,  
16 adequate and reliable service (in exchange for a reasonable opportunity to earn a fair return  
17 on their investment), they generally do not have the option to delay, defer, or reject capital  
18 investments. This means that utilities generally do not have the option to avoid raising  
19 external funds during periods of capital market distress, if necessary.

20 Because utilities invest in long-lived assets, long-term business risks are of  
21 paramount concern to equity investors. That is, the risk of not recovering a fair return on  
22 their investment extends far into the future. The timing and nature of events that may lead  
23 to losses, however, also are uncertain and, consequently, those risks and their implications  
24 for the required return on equity tend to be difficult to quantify. Regulatory commissions

(like investors who commit their capital) must review a variety of quantitative and qualitative data and apply their reasoned judgment to determine how long-term risks weigh in their assessment of the market-required return on common equity.

**B. Financial Risk**

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

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

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

A. Yes, similar bond ratings/issuer credit ratings reflect, and are representative of, similar combined business and financial risks (i.e., total risk) faced by bond investors.<sup>6</sup> Although specific business or financial risks may differ between companies, the same bond/credit rating indicates that the combined risks are roughly similar from a debtholder perspective. The caveat is that these debtholder risk measures do not translate directly to risks for common equity.

<sup>6</sup> 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 at 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.

1 **Q. Do ratings agencies account for company size in their bond ratings?**

2 No. Neither Standard & Poor's Ratings Services ("S&P") nor Moody's Investors Service  
3 ("Moody's") have minimum company size requirements for any given rating level. This  
4 means, all else being equal, a relative size analysis must be conducted for equity  
5 investments in companies with similar bond ratings.

6 **IV. LGE, KU, AND THE UTILITY PROXY GROUP**

7 **Q. ARE YOU FAMILIAR WITH THE COMPANIES' OPERATIONS?**

8 A. Yes. LGE's operations serve approximately 440,000 electric customers and 336,000  
9 natural gas customers in Kentucky.<sup>7</sup> KU's operations serve approximately 549,000 electric  
10 customers in central, southeastern, and western Kentucky and 28,000 customers in  
11 southwestern Virginia.<sup>8</sup> LGE and KU are wholly-owned subsidiaries of PPL Corporation  
12 ("PPL"), which has regulated operations in four states<sup>9</sup>, serves approximately 3.7 million  
13 electric and natural gas customers,<sup>10</sup> and is publicly-traded under symbol PPL.

14 **Q. WHY IS IT NECESSARY TO DEVELOP A PROXY GROUP WHEN ESTIMATING**  
15 **THE ROE FOR THE COMPANIES?**

16 A. Because the Companies are not publicly traded and do not have publicly traded equity  
17 securities, it is necessary to develop groups of publicly traded, comparable companies to  
18 serve as "proxies" for the Company. In addition to the analytical necessity of doing so, the  
19 use of proxy companies is consistent with the *Hope* and *Bluefield* comparable risk  
20 standards, as discussed above. I have selected two proxy groups that, in my view, are  
21 fundamentally risk-comparable to LGE and KU's electric operations: an Electric Utility

7 PPL Corporation, 2024 SEC Form 10-K, at 4.

8 PPL Corporation, 2024 SEC Form 10-K, at 4.

9 PPL Corporation, 2024 SEC Form 10-K, at 4. In addition to Kentucky, PPL also serves customers in  
Pennsylvania, Rhode Island, and Virginia.

10 PPL Corporation, 2024 SEC Form 10-K, at 4.

1 Proxy Group and a Non-Price Regulated Proxy Group, which is comparable in total risk to  
2 the Electric Utility Proxy Group.<sup>11</sup> In addition, I have selected two proxy groups that, in  
3 my view, are fundamentally risk-comparable to LGE's natural gas operations: a Natural  
4 Gas Utility Proxy Group and a Non-Price Regulated Proxy Group, which is comparable in  
5 total risk to the Natural Gas Utility Proxy Group.

6 Even when proxy groups are carefully selected, it is common for analytical results  
7 to vary from company to company. Despite the care taken to ensure comparability, because  
8 no two companies are identical, market expectations regarding future risks and prospects  
9 will vary within the proxy group. It therefore is common for analytical results to reflect a  
10 seemingly wide range, even for a group of similarly situated companies. At issue is how  
11 to estimate the ROE from within that range. That determination will be best informed by  
12 employing a variety of sound analyses that necessarily must consider the sort of  
13 quantitative and qualitative information discussed throughout my Direct Testimony.  
14 Additionally, a relative risk analysis between the Company and the Utility Proxy Groups  
15 must be made to determine whether or not explicit Company-specific adjustments need to  
16 be made to the Utility Proxy Groups' indicated results.

17 **Q. PLEASE EXPLAIN HOW YOU CHOSE THE COMPANIES IN THE ELECTRIC**  
18 **UTILITY PROXY GROUP.**

19 A. The companies selected for the Electric Utility Proxy Group met the following criteria:

- 20 (i) They were included in the Eastern, Central, or Western Electric Utility Group of  
21 Value Line (Standard Edition);  
22 (ii) They have 70% or greater of fiscal year 2023 total operating income derived from,  
23 or 70% or greater of fiscal year 2023 total assets attributable to, regulated electric  
24 operations;

<sup>11</sup> The development of the Non-Price Regulated Proxy Group is explained in more detail in Section V.

- 1 (iii) They are vertically integrated (i.e., utilities that own and operate regulated  
2 generation, transmission, and distribution assets);
- 3 (iv) At the time of preparation of this direct testimony, they had not publicly announced  
4 that they were involved in any major merger or acquisition activity (i.e., one  
5 publicly-traded utility merging with or acquiring another);
- 6 (v) They have not cut or omitted their common dividends during the five years ended  
7 2023 or through the time of preparation of this testimony;
- 8 (vi) They have *Value Line* and Bloomberg Professional Services (“Bloomberg”)  
9 adjusted betas;
- 10 (vii) They have positive *Value Line* five-year dividends per share (“DPS”) growth rate  
11 projections; and
- 12 (viii) They have *Value Line*, Zacks, or S&P Capital IQ consensus five-year earnings per  
13 share (“EPS”) growth rate projections.

14 The following 15 companies met these criteria:

**Table 2: Electric Utility Proxy Group Screening Results**

<b>Company</b>	<b>Ticker</b>
Alliant Energy Corporation	LNT
Ameren Corporation	AEE
American Electric Power Company, Inc.	AEP
Duke Energy Corporation	DUK
Edison International	EIX
Entergy Corporation	ETR
Eversource Energy, Inc.	ESV
IDACORP, Inc.	IDA
NorthWestern Corporation	NWE
OGE Energy Corporation	OGE
Pinnacle West Capital Corporation	PNW
Portland General Electric Co.	POR
Southern Company	SO
TXNM Energy Inc.	TXNM
Xcel Energy, Inc.	XEL

**Q. PLEASE EXPLAIN HOW YOU CHOSE THE COMPANIES IN THE NATURAL GAS UTILITY PROXY GROUP.**

A. The companies selected for the Natural Gas Utility Proxy Group met the following criteria:

- (i) They were included in the Natural Gas Utility Group of Value Line;
- (ii) They have 60% or greater of fiscal year 2023 total operating income derived from, and 60% or greater of fiscal year 2023 total assets attributable to, regulated gas distribution operations;
- (iii) At the time of preparation of this testimony, they had not publicly announced that they were involved in any major merger or acquisition activity (*i.e.*, one publicly-traded utility merging with or acquiring another) or any other major development;
- (iv) They have not cut or omitted their common dividends during the five years ended 2023 or through the time of preparation of this testimony;

- (v) They have *Value Line* and Bloomberg Professional Services (“Bloomberg”) adjusted beta coefficients (“beta”);
- (vi) They have positive *Value Line* five-year dividends per share (“DPS”) growth rate projections; and
- (vii) They have *Value Line*, Zacks, or S&P Capital IQ consensus five-year EPS growth rate projections.

The following seven companies met these criteria:

**Table 3: Natural Gas Utility Proxy Group Screening Results**

<b>Company</b>	<b>Ticker</b>
Atmos Energy Corporation	ATO
New Jersey Resources Corporation	NJR
NiSource Inc.	NI
Northwest Natural Gas Company	NWN
ONE Gas, Inc.	OGS
Southwest Gas Holdings, Inc.	SWX
Spire Inc.	SR

**V. CAPITAL STRUCTURE**

**Q. WHAT ARE LGE’S AND KU’S REQUESTED CAPITAL STRUCTURES?**

A. LGE’s natural gas and electric requested capital structures consist of 1.71% short-term debt, 45.36% long-term debt and 52.93% common equity. KU’s requested capital structure consists of 2.55% short-term debt, 44.60% long-term debt, and 52.86% common equity as testified to by Ms. Burgos.<sup>12</sup>

<sup>12</sup> Differences due to rounding.

1 **Q. HOW DO THE COMPANIES' REQUESTED COMMON EQUITY RATIOS**  
2 **COMPARE WITH THE COMMON EQUITY RATIOS MAINTAINED BY THE**  
3 **UTILITY PROXY GROUPS?**

4 A. The Companies' requested ratemaking common equity ratios are reasonable and consistent  
5 with the range of common equity ratios maintained by the Electric and Natural Gas Utility  
6 Proxy Groups. As shown on pages 3 and 4 of Exhibit DWD-2, common equity ratios of  
7 the Natural Gas and Electric Utility Proxy Group companies range from 40.23% to 62.38%  
8 and 28.06% to 50.97%, respectively, for fiscal year 2023.

9 In addition to comparing the Companies' actual common equity ratio with current  
10 common equity ratios maintained by the Electric and Natural Gas Utility Proxy Group  
11 companies, I also compared the company's actual common equity ratio with the equity  
12 ratios maintained by the utility operating subsidiaries of the Natural Gas and Electric Utility  
13 Proxy Group companies. As shown on pages 5 through 7 of Exhibit DWD-2, common  
14 equity ratios of the utility operating subsidiaries of the Natural Gas Utility Proxy Group  
15 range from 37.70% to 60.41% and the utility operating subsidiaries of the Electric Utility  
16 Proxy Group range from 36.55% to 66.40% for fiscal year 2023.

17 **Q. ARE LGE'S AND KU'S EQUITY RATIOS APPROPRIATE FOR**  
18 **RATEMAKING PURPOSES GIVEN THE MEASURES CITED ABOVE?**

19 A. Yes, they are. LGE's equity ratio is appropriate for ratemaking purposes in the current  
20 proceedings because it is within the range of the common equity ratios currently  
21 maintained, and expected to be maintained, by the Natural Gas Utility Proxy Group and  
22 their utility operating subsidiaries.

23 In addition, although LGE's and KU's capital structure contains more equity than  
24 the range of equity ratios maintained by the Electric Utility Proxy group, it finances LGE's

1 and KU's rate base. Nevertheless, since LGE and KU would be perceived to have less  
2 financial risk than the Electric Utility Proxy Group due to its higher equity ratio, based on  
3 its less risky bond rating I have made a downward adjustment to the Electric Utility Proxy  
4 Group's indicated ROE, as will be discussed below.

## 5 **VI. COMMON EQUITY COST RATE MODELS**

6 **Q. IS IT IMPORTANT THAT COST OF COMMON EQUITY MODELS BE MARKET**  
7 **BASED?**

8 A. Yes. While a public utility operates a regulated business within the states in which it  
9 operates, it still must compete for equity in capital markets along with all other companies  
10 of comparable risk, which includes non-utilities. The cost of common equity is thus  
11 determined based on equity market expectations for the returns of those companies. If an  
12 individual investor is choosing to invest their capital among companies of comparable risk,  
13 they will choose a company providing a higher return over a company providing a lower  
14 return.

15 **Q. ARE YOUR COST OF COMMON EQUITY MODELS MARKET BASED?**

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

1 **Q. WHAT ANALYTICAL APPROACHES DID YOU USE TO DETERMINE THE**  
2 **COMPANY'S ROE?**

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

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

18 **A. Discounted Cash Flow Model**

19 **Q. WHAT IS THE THEORETICAL BASIS OF THE DCF MODEL?**

20 A. The theory underlying the DCF model is that the present value of an expected future stream  
21 of net cash flows during the investment holding period can be determined by discounting  
22 those cash flows at the cost of capital, or the investors' capitalization rate. DCF theory  
23 indicates that an investor buys a stock for an expected total return rate, which is derived  
24 from the cash flows received from dividends and market price appreciation.

Mathematically, the dividend yield on market price plus a growth rate equals the capitalization rate; *i.e.*, the total common equity return rate expected by investors.

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

where:

$K_e$  = the required Return on Common Equity;

$D_0$  = the annualized Dividend Per Share;

$P$  = the current stock price; and

$g$  = the growth rate.

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

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

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

A. The unadjusted dividend yields are based on the proxy companies' dividends as of February 28, 2025, divided by the average closing market price for the 60 trading days ended February 28, 2025.<sup>13</sup>

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

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

DCF theory calls for using the full growth rate, or  $D_1$ , in calculating the model's dividend yield component. Since the companies in the Utility Proxy Group increase their quarterly dividends at various times during the year, a reasonable assumption is to reflect one-half the annual dividend growth rate in the dividend yield component, or  $D_{1/2}$ . Because

<sup>13</sup> See, column 1, page 1 of Exhibit DWD-2.

the dividend should be representative of the next 12-month period, this adjustment is a conservative approach that does not overstate the dividend yield. Therefore, the actual average dividend yields in Column 1, page 1 of Exhibit DWD-2 have been adjusted upward to reflect one-half the average projected growth rate shown in Column 6.

**Q. PLEASE EXPLAIN THE BASIS FOR THE GROWTH RATES YOU APPLY TO THE UTILITY PROXY GROUPS IN YOUR CONSTANT GROWTH DCF MODEL.**

A. Investors are likely to rely on widely available financial information services, such as *Value Line*, *Zacks*, and *S&P Capital IQ*. Investors realize that analysts have significant insight into the dynamics of the industries and individual companies they analyze, as well as companies' ability to effectively manage the effects of changing laws and regulations, and ever-changing economic and market conditions. For these reasons, I used analysts' five-year forecasts of EPS growth in my DCF analysis.

Over the long run, there can be no growth in DPS without growth in EPS. Security analysts' earnings expectations have a more significant influence on market prices than dividend expectations. Thus, using earnings growth rates in a DCF analysis provides a better match between investors' market price appreciation expectations and the growth rate component of the DCF.

**Q. PLEASE SUMMARIZE THE CONSTANT GROWTH DCF MODEL RESULTS.**

A. The results of applying the DCF model to the Utility Proxy Groups are shown on page 1 of Exhibit DWD-3 and in Tables 4 and 5 below:

**Table 4: DCF Model Results for the Natural Gas Utility Proxy Group**

Mean	10.27%
Median	<u>10.31%</u>
Average of Mean and Median	<u>10.29%</u>

**Table 5: DCF Model Results for the Electric Utility Proxy Group**

Mean	10.33%
Median	<u>10.30%</u>
Average of Mean and Median	<u>10.32%</u>

In arriving at a conclusion for the constant growth DCF-indicated common equity cost rate for the Utility Proxy Groups, I relied on an average of the mean and median results of the DCF, specifically 10.29% for the Natural Gas Utility Proxy Group and 10.32% for the Electric Utility Proxy Group. This approach takes into consideration all proxy company results while mitigating high and low side outliers of those results.

**B. The Risk Premium Model**

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

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

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

1 **Q. PLEASE EXPLAIN THE TOTAL MARKET APPROACH RPM.**

2 A. The total market approach RPM adds a prospective public utility bond yield to an average  
3 of: (1) an equity risk premium that is derived from a beta-adjusted total market equity risk  
4 premium, (2) an equity risk premium based on the S&P Utilities Index, and (3) an equity  
5 risk premium based on authorized ROEs for natural gas distribution utilities.

6 **Q. PLEASE EXPLAIN THE BASIS OF THE EXPECTED BOND YIELDS**  
7 **APPLICABLE TO THE NATURAL GAS AND ELECTRIC UTILITY PROXY**  
8 **GROUPS.**

9 A. The first step in the total market approach RPM analysis is to determine the expected bond  
10 yield. Because both ratemaking and the cost of capital, including the common equity cost  
11 rate, are prospective in nature, a prospective yield on similarly-rated long-term debt is  
12 essential. I relied on a consensus forecast of about 50 economists of the expected yield on  
13 Aaa-rated corporate bonds for the six calendar quarters ending with the second calendar  
14 quarter of 2026, and *Blue Chip Financial Forecast's* ("Blue Chip") long-term projections  
15 for 2026 to 2030, and 2031 to 2035. As shown on line 1, page 1 of Exhibit DWD-4, the  
16 average expected yield on Moody's Aaa-rated corporate bonds is 5.35%. In order to adjust  
17 the expected Aaa-rated corporate bond yield to an equivalent A2-rated public utility bond  
18 yield, I made an upward adjustment of 0.38%, which represents a recent spread between  
19 Aaa-rated corporate bonds and A2-rated public utility bonds.<sup>14</sup> Adding that recent 0.38%  
20 spread to the expected Aaa-rated corporate bond yield of 5.35% results in an expected A2-  
21 rated public utility bond yield of 5.73%. Since the Utility Proxy Group's average Moody's  
22 long-term issuer rating is A2, no further adjustment is needed.

<sup>14</sup> As shown on line 2 of page 1 of Exhibit DWD-4 and explained in note 2, page 1 of Exhibit DWD-4.

**Table 6: Summary of the Calculation of the Utility Proxy Group Projected Bond Yield<sup>15</sup>**

	<b>Natural Gas</b>	<b>Electric</b>
Prospective Yield on Moody's Aaa-Rated Corporate Bonds ( <i>Blue Chip</i> )	5.35%	5.35%
Adjustment to Reflect Yield Spread Between Moody's Aaa-Rated Corporate Bonds and Moody's A2-Rated Utility Bonds	<u>0.38%</u>	<u>0.38%</u>
Adjustment to Reflect the Natural Gas Utility Proxy Group's Average Moody's Bond Rating of A3	<u>0.07%</u>	
Adjustment to Reflect the Electric Utility Proxy Group's Average Moody's Bond Rating of Baa1		<u>0.13%</u>
Prospective Bond Yield Applicable to the Utility Proxy Group	<u>5.80%</u>	<u>5.86%</u>

**a. The Beta-Derived Risk Premium**

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

A. The components of the beta-derived risk premium model are: (1) an expected market equity risk premium over corporate bonds, and (2) the beta. The derivation of the beta-derived equity risk premium that I applied to the Utility Proxy Group is shown on lines 1 through 8, on page 6 of Exhibit DWD-4. The total beta-derived equity risk premium I applied is based on an average of three historical market data-based equity risk premiums, a *Value Line*-based equity risk premium, and a combined *Value Line*, Bloomberg, and S&P Capital IQ-based equity risk premium. Each of these are described below.

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

A. To derive a historical market equity risk premium, I used the most recent holding period returns for the large company common stocks less the average historical yield on Moody's

<sup>15</sup> As shown on page 1 of Exhibit DWD-4.

1       Aaa/Aa-rated corporate bonds for the period 1928 to 2024. The use of holding period  
2       returns over a very long period of time is appropriate because it is consistent with the long-  
3       term investment horizon presumed by investing in a going concern, i.e., a company  
4       expected to operate in perpetuity.

5               The long-term arithmetic mean monthly total return rate on large company common  
6       stocks was 12.05% and the long-term arithmetic mean monthly yield on Moody's Aaa/Aa-  
7       rated corporate bonds was 5.95% from 1928 to 2024. As shown on line 1 of page 6 of  
8       Exhibit DWD-4, subtracting the mean monthly bond yield from the total return on large  
9       company stocks results in a long-term historical equity risk premium of 6.10%.

10              I used the arithmetic mean monthly total return rates for the large company stocks  
11       and yields (income returns) for the Moody's Aaa/Aa-rated corporate bonds, because they  
12       are appropriate for the purpose of estimating the cost of capital as noted in Kroll's Stocks,  
13       Bonds, Bills, and Inflation ("SBBI") Yearbook 2023 ("SBBI - 2023"). The use of the  
14       arithmetic mean return rates and yields is appropriate because historical total returns and  
15       equity risk premiums provide insight into the variance and standard deviation of returns  
16       needed by investors in estimating future risk when making a current investment. If  
17       investors relied on the geometric mean of historical equity risk premiums, they would have  
18       no insight into the potential variance of future returns because the geometric mean relates  
19       the change over many periods to a constant rate of change, thereby obviating the year-to-  
20       year fluctuations, or variance, which is critical to risk analysis.

21   **Q.   PLEASE EXPLAIN THE DERIVATION OF THE REGRESSION-BASED**  
22   **MARKET EQUITY RISK PREMIUM.**

23   A.   To derive the regression-based market equity risk premium of 6.82% shown on line 2, page  
24       6 of Exhibit DWD-4, I used the same monthly annualized total returns on large company

common stocks relative to the monthly annualized yields on Moody's Aaa/Aa-rated corporate bonds as mentioned above. I modeled the relationship between interest rates and the market equity risk premium using the observed monthly market equity risk premium as the dependent variable, and the monthly yield on Moody's Aaa/Aa-rated corporate bonds as the independent variable. I then used a linear Ordinary Least Squares ("OLS") regression, in which the market equity risk premium is expressed as a function of the Moody's Aaa/Aa-rated corporate bond yield:

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

where:

RP = the market equity risk premium;

$\alpha$  = the regression intercept coefficient;

$\beta$  = the regression slope coefficient; and

$R_{Aaa/Aa}$  = the Moody's Aaa/Aa rated corporate bond yield.

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

A. The PRPM, published in the *Journal of Regulatory Economics* and *The Electricity Journal*,<sup>16</sup> was developed from the work of Robert F. Engle, who shared the Nobel Prize in Economics in 2003 "for methods of analyzing economic time series with time-varying volatility ("ARCH)".<sup>17</sup> Engle found that volatility changes over time and is related from one period to the next, especially in financial markets. Engle discovered that the volatility

<sup>16</sup> 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, *The Journal of Regulatory Economics* (December 2011), 40:261-278 and "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", Richard A. Michelfelder, Pauline M. Ahern, Dylan W. D'Ascendis, and Frank J. Hanley, *The Electricity Journal* (May 2013), 84-89.

<sup>17</sup> [www.nobelprize.org](http://www.nobelprize.org).

1 in prices and returns clusters over time, and is therefore highly predictable, and can be used  
2 to predict future levels of risk and risk premiums.

3 The PRPM estimates the risk / return relationship directly, as the predicted equity  
4 risk premium is generated by the prediction of volatility or risk. The PRPM is not based  
5 on an estimate of investor behavior, but rather on the evaluation of the results of that  
6 behavior (i.e., the variance of historical equity risk premiums).

7 The inputs to the model are the historical returns on large company stocks minus  
8 the historical monthly yield on Moody's Aaa/Aa-rated corporate bonds from January 1928  
9 through February 2025. Using a generalized form of ARCH, known as GARCH, I  
10 calculated each Utility Proxy Group company's projected equity risk premium using  
11 Eviews<sup>®</sup> statistical software. When the GARCH model is applied to the historical return  
12 data, it produces a predicted GARCH variance series and a GARCH coefficient.  
13 Multiplying the predicted monthly variance by the GARCH coefficient and then  
14 annualizing, it produces the predicted annual equity risk premium. The resulting PRPM  
15 predicted a market equity risk premium of 7.32%.<sup>18</sup>

16 **Q. IS THE PRPM SUPPORTED BY ACADEMIC LITERATURE?**

17 A. Yes, it is. The PRPM is based on the research of Dr. Robert F. Engle, dating back to the  
18 early 1980s. Dr. Engle discovered that the volatility of market prices, returns, and risk  
19 premiums clusters over time, making prices, returns, and risk premiums highly predictable.  
20 In 2003, he shared the Nobel Prize in Economics for this work, characterized as "methods  
21 of analyzing economic time series with time-varying volatility ("ARCH").<sup>19</sup> Dr. Engle<sup>20</sup>

<sup>18</sup> Shown on line 3, page 6 of Exhibit DWD-4.

<sup>19</sup> [www.nobelprize.org](http://www.nobelprize.org).

<sup>20</sup> 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.

1 noted that relative to volatility, “the standard tools have become the ARCH/GARCH<sup>21</sup>  
2 models.” Hence, the methodology is not new.

3 In addition, the GARCH methodology has been well tested by academia since  
4 Engle’s, *et al.* research was originally published in 1982, over 40 years ago. I use the well-  
5 established GARCH methodology to estimate the PRPM model using a standard  
6 commercial and relatively inexpensive statistical package, Eviews,<sup>©22</sup> to develop a means  
7 by which to estimate a predicted equity risk premium which, when added to a bond yield,  
8 results in a cost of common equity.

9 Also, the PRPM is in the public domain, having been published six times in  
10 academically peer-reviewed journals: *Journal of Economics and Business* (June 2011 and  
11 April 2015),<sup>23</sup> *The Journal of Regulatory Economics* (December 2011),<sup>24</sup> *The Electricity*  
12 *Journal* (May 2013 and March 2020),<sup>25</sup> and *Energy Policy* (April 2019).<sup>26</sup> Notably, none  
13 of these articles have been rebutted in the academic literature. Finally, the PRPM has also  
14 been presented to a number of utility industry/regulatory/academic groups including the  
15 following: The Edison Electric Institute Cost of Capital Working Group; The NARUC

21 Autoregressive Conditional Heteroskedasticity/Generalized Autoregressive Conditional Heteroskedasticity.  
22 In addition to Eviews,<sup>®</sup> 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 these proceedings, Eviews,<sup>®</sup> currently costs \$600 - \$700 for a  
single user commercial license. In addition, JMulti is a free downloadable software with GARCH  
estimation applications.

23 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”, *Journal of Economics and Business*, April 2015, 37-50.

24 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.  
25 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 Journal*, April 2013, at 84-89;  
and Richard A. Michelfelder, Pauline M. Ahern, and Dylan W. D’Ascendis, “Decoupling, Risk Impacts  
and the Cost of Capital”, *The Electricity Journal*, January 2020.

26 Richard A. Michelfelder, Pauline M. Ahern, and Dylan W. D’Ascendis, “Decoupling Impact and Public  
Utility Conservation Investment”, *Energy Policy*, April 2019, 311-319.

1 Staff Subcommittee on Accounting and Finance; The National Association of Electric  
2 Companies Finance/Accounting/Taxation and Rates and Regulations Committees; the  
3 NARUC Electric Committee; The Wall Street Utility Group; the Indiana Utility Regulatory  
4 Commission Cost of Capital Task Force; the Financial Research Institute of the University  
5 of Missouri Hot Topic Hotline Webinar; and the Center for Research and Regulated  
6 Industries Annual Eastern Conference on two occasions.

7 **Q. HAS THE PRPM BEEN IMPLICITLY ACCEPTED BY OTHER REGULATORY**  
8 **COMMISSIONS?**

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

12 The Commission finds Mr. D’Ascendis’ arguments persuasive. He provided  
13 more indicia of market returns, by using more analytical methods and proxy  
14 group calculations. Mr. D’Ascendis’ use of analysts’ estimates for his DCF  
15 analysis is supported by consensus, as is his use of the arithmetic mean. The  
16 Commission also finds that Mr. D’Ascendis’ non-price regulated proxy  
17 group more accurately reflects the total risk faced [by] price regulated  
18 utilities and CWS. Furthermore, there is no dispute that CWS is  
19 significantly smaller than its proxy group counterparts, and, therefore, it  
20 may present a higher risk. An appropriate ROE for CWS is 10.45% to  
21 10.95%. The Company used an ROE of 10.5% in computing its  
22 Application, a return on the low end of Mr. D’Ascendis’ range, and the  
23 Commission finds that ROE is supported by the evidence.<sup>27</sup>

24 In addition, in Docket No. W-354, Subs 363, 364 and 365, the State of North  
25 Carolina Utilities Commission (“NCUC”) approved my RPM and CAPM analyses, which  
26 used PRPM analyses as presented in these proceedings. The relevant portion of the order  
27 states:

28 In doing so the Commission finds that the DCF (8.81%), Risk Premium  
29 (10.00%) and CAPM (9.29%) model results provided by witness  
30 D’Ascendis, as updated to use current rates in D’Ascendis Late-Filed  
31 Exhibit No. 1, as well as the risk premium (9.57%) analysis of witness

<sup>27</sup> PSC SC Docket No. 2017-292-WS - Order No. 2018-345, at 14. (May 17, 2018)

Hinton, are credible, probative, and are entitled to substantial weight as set forth below.<sup>28</sup>

**Q. HAS THE COMMISSION REJECTED THE PRPM PREVIOUSLY?**

A. Yes, it has. In Case No. 2021-00214 concerning Atmos Energy, the Commission stated:

Even though the Commission supports the use and presentation of multiple modelling approaches, the Commission finds that Atmos Kentucky's use of the Predictive Risk Premium Model (PRPM) should be rejected. Though the PRPM model has been published and presented in multiple forums, it has been rejected by this Commission and only been addressed by three other regulatory jurisdictions thus far and is not universally accepted.

Similarly, in Case No. 2022-00432 concerning Bluegrass Water Utility Operating Company, LLC, the Commission stated:

Even though the Commission supports the use and presentation of multiple modelling approaches, the Commission continues to reject the use of the PRPM model to estimate risk premium. The PRPM model has been only been addressed by three other regulatory commissions and is not universally accepted.

**Q. DO YOU HAVE A RESPONSE TO THE COMMISSION'S STATEMENTS?**

A. Yes, I do. I appreciate the Commission's openness to considering multiple models in its determination of ROEs for the utilities they regulate, but I respectfully disagree with their exclusion of the PRPM in Case No. 2021-00214 and Case No. 2022-00432. As noted above, the theory supporting the model is based on the Nobel Prize winning work of Engle, and the model itself has been published six times in four separate peer-reviewed academic journals, which indicates that it has been thoroughly vetted by the academic community. This, in addition to the fact that the model has not been rebutted in the academic literature in the over ten years since it has been presented should speak to the model's soundness.

Regarding the amount of times the model has been addressed in final orders; while it is true that a number regulatory commissions have addressed the PRPM in their final

<sup>28</sup> NCUC Docket No. W-354, Sub 363, 364, 365, *Order Granting Partial Rate Increase and Requiring Customer Notice*, at PDF 72 (March 31, 2020).

1 orders, the model has been presented in over 100 regulatory proceedings in approximately  
2 40 U.S. regulatory jurisdictions and the Alberta Utilities Commission in Canada. This  
3 would indicate that while maybe not universally accepted, the model is widely  
4 disseminated across the U.S. regulatory landscape.

5 In view of the above, the soundness of the model, as evidenced in the underlying  
6 theory and the academic vetting of the PRPM, and the wide dissemination of the model in  
7 the U.S. regulatory landscape should lead the Commission reconsider the PRPM in its  
8 determination regarding the ROE for LGE and KU in these proceedings.

9 **Q. HAVE YOU APPLIED THE PRPM IN THE SAME MANNER IN THESE**  
10 **PROCEEDINGS AS YOU DID IN ATMOS ENERGY'S RECENT RATE CASE**  
11 **(CASE NO. 2024-00276)?**

12 A. Yes, I have. I rely on the PRPM solely in my estimation of the equity risk premium used  
13 in my RPM and CAPM analyses.

14 **Q. DOES INCLUDING THE PRPM MATERIALLY AFFECT YOUR INDICATED**  
15 **MODEL RESULTS?**

16 A. No, it does not. While I respectfully disagree with the Commission's previous findings, I  
17 have presented my ROE model results including and excluding the PRPM for the  
18 Commission's convenience. Viewing the results of the Natural Gas Utility Proxy Group,  
19 the difference in the RPM, CAPM and Non-Price Regulated Proxy Group including and  
20 excluding the PRPM are 0.05%, 0.01%, and 0.01%, respectively. The difference in the  
21 RPM and Non-Price Regulated Proxy Group results for the Electric Utility Proxy Group  
22 including and excluding the PRPM are 0.05% and 0.01%, respectively. The CAPM results  
23 for the Electric Utility Proxy Group are the same. These differences do not change my  
24 recommended ROE in this instance.

1 **Q. PLEASE EXPLAIN THE DERIVATION OF A PROJECTED EQUITY RISK**  
2 **PREMIUM BASED ON *VALUE LINE* SUMMARY & INDEX DATA FOR YOUR**  
3 **RPM ANALYSIS.**

4 A. As noted above, because both ratemaking and the cost of capital are prospective, a  
5 prospective market equity risk premium is needed. The derivation of the forecasted or  
6 prospective market equity risk premium can be found in note 4, page 6 of Exhibit DWD-  
7 4. Consistent with my calculation of the dividend yield component in my DCF analysis,  
8 this prospective market equity risk premium is derived from an average of the three-to five-  
9 year median market price appreciation potential by *Value Line* for the 13 weeks ended  
10 February 28, 2025, plus an average of the median estimated dividend yield for the common  
11 stocks of the 1,700 firms covered in *Value Line* (Standard Edition).<sup>29</sup>

12 The average median expected price appreciation is 42%, which translates to a  
13 9.16% annual appreciation, and when added to the average of *Value Line*'s median expected  
14 dividend yields of 2.04%, equates to a forecasted annual total return rate on the market of  
15 11.20%. The forecasted Moody's Aaa-rated corporate bond yield of 5.35% is deducted  
16 from the total market return of 11.20%, resulting in an equity risk premium of 5.85%, as  
17 shown on line 4, page 6 of Exhibit DWD-4.

18 **Q. PLEASE EXPLAIN THE DERIVATION OF AN EQUITY RISK PREMIUM**  
19 **BASED ON THE S&P 500 COMPANIES.**

20 A. Using data from *Value Line*, Bloomberg, and S&P Capital IQ, I calculated an expected total  
21 return on the S&P 500 companies using expected dividend yields and long-term growth  
22 estimates as a proxy for capital appreciation. The expected total return for the S&P 500 is  
23 15.23%. Subtracting the prospective yield on Moody's Aaa-rated corporate bonds of

<sup>29</sup> As explained in detail in note 1, page 2 of Exhibit DWD-4.

5.35% results in a 9.88% projected equity risk premium as shown on page 6, line 5 of Exhibit DWD-4.

**Q. WHAT IS YOUR CONCLUSION OF A BETA-DRIVEN EQUITY RISK PREMIUM FOR USE IN YOUR RPM ANALYSIS?**

A. I gave equal weight to all five equity risk premiums based on each source – historical, *Value Line*, and Bloomberg – in arriving at a 7.19% equity risk premium.

**Table 7: Summary of the Calculation of the Equity Risk Premium Using Total Market Returns<sup>30</sup>**

Historical Spread Between Total Returns of Large Stocks and Aaa and Aa-Rated Corporate Bond Yields (1928 – 2024)	6.10%
Regression Analysis on Historical Data	6.82%
PRPM Analysis on Historical Data	7.32%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected Aaa Corporate Bond Yields	5.85%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns for the S&P 500 less Projected Aaa Corporate Bond Yields	<u>9.88%</u>
Average	<u>7.19%</u>

After calculating the average market equity risk premium of 7.19%, I adjusted it by beta to account for the risk of the Utility Proxy Groups. As discussed below, beta is a meaningful measure of prospective relative risk to the market as a whole, and is a logical way to allocate a company's, or proxy group's, share of the market's total equity risk premium relative to corporate bond yields. As shown on page 1 of Exhibit DWD-4, the average of the mean and median beta for the Natural Gas and Electric Utility Proxy Groups are 0.79 and 0.73, respectively. Multiplying beta by the market equity risk premium of

<sup>30</sup> As shown on page 6 of Exhibit DWD-4. The average risk premium excluding the PRPM is 7.16%.

1 7.19% results in beta-adjusted equity risk premiums of 5.68% and 5.25% for the Natural  
2 Gas and Electric Utility Proxy Groups, respectively.

3 ***b. The S&P Utility Index-Derived Risk Premium***

4 **Q. HOW DID YOU DERIVE THE EQUITY RISK PREMIUM BASED ON THE S&P**  
5 **UTILITY INDEX AND MOODY'S A2-RATE PUBLIC UTILITY BONDS?**

6 A. I estimated three equity risk premiums based on S&P Utility Index holding period returns,  
7 and one equity risk premium based on the expected returns of the S&P Utilities Index,  
8 using *Value Line*, Bloomberg data, and S&P Capital IQ. Turning first to the S&P Utility  
9 Index holding period returns, I derived a long-term monthly arithmetic mean equity risk  
10 premium between the S&P Utility Index total returns of 10.59% and monthly Moody's A2-  
11 rated public utility bond yields of 6.42% from 1928 to 2024, to arrive at an equity risk  
12 premium of 4.16%.<sup>31</sup> I then used the same historical data to derive an equity risk premium  
13 of 4.80% based on a regression of the monthly equity risk premiums. The final S&P Utility  
14 Index holding period equity risk premium involved applying the PRPM using the historical  
15 monthly equity risk premiums from January 1928 to February 2025 to arrive at a PRPM-  
16 derived equity risk premium of 5.07% for the S&P Utility Index.

17 I then derived an expected total return on the S&P Utilities Index of 10.73% using  
18 data from *Value Line*, Bloomberg, and S&P Capital IQ, and subtracted the prospective  
19 Moody's A2-rated public utility bond yield of 5.73%.<sup>32</sup> This resulted in equity risk  
20 premium of 5.00%. As with the market equity risk premiums, I averaged the four risk  
21 premium based to arrive at my utility-specific equity risk premium of 4.76%.

<sup>31</sup> As shown on line 1, page 9 of Exhibit DWD-4.

<sup>32</sup> Derived on line 3, page 1 of Exhibit DWD-4.

**Table 8: Summary of the Calculation of the Equity Risk Premium Using S&P Utility Index Holding Returns<sup>33</sup>**

Historical Spread Between Total Returns of the S&P Utilities Index and A2-Rated Utility Bond Yields (1928 – 2024)	4.16%
Regression Analysis on Historical Data	4.80%
PRPM Analysis on Historical Data	5.07%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns for the S&P Utilities Index less Projected A2 Utility Bond Yields	<u>5.00%</u>
Average	<u>4.76%</u>

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

**Q. HOW DID YOU DERIVE AN EQUITY RISK PREMIUM OF 4.73% BASED ON AUTHORIZED ROES FOR NATURAL GAS DISTRIBUTION UTILITIES AND 4.77% FOR ELECTRIC UTILITIES?**

**A.** The equity risk premium of 4.73% shown on page 10 of Exhibit DWD-4 and 4.77% shown on page 11 of Exhibit DWD-4 are the result of regression analyses based on regulatory awarded ROEs related to the yields on Moody’s A2-rated public utility bonds and contains the graphical results of a regression analysis of 848 rate cases for natural gas distribution utilities and 1,257 rate cases for electric utilities which were fully litigated during the period from January 1, 1980 through February 28, 2025. It shows the implicit equity risk premium relative to the yields on A2-rated public utility bonds immediately prior to the issuance of each regulatory decision. It is readily discernible that there is an inverse relationship between the yield on A2-rated public utility bonds and equity risk premiums. In other words, as interest rates decline, the equity risk premium rises and vice versa, a result consistent with financial literature on the subject.<sup>34</sup> I used the regression results to estimate

<sup>33</sup> As shown on page 9 of Exhibit DWD-4. The average equity risk premium excluding the PRPM is 4.65%.  
<sup>34</sup> 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.

the equity risk premium applicable to the projected yield on Moody's A2-rated public utility bonds. Given the expected A2-rated utility bond yield of 5.73%, it can be calculated that the indicated equity risk premium applicable to that bond yield is 4.73% based on the natural gas utilities and 4.77% based on electric utilities.

**Q. WHAT IS YOUR CONCLUSION OF EQUITY RISK PREMIUMS FOR USE IN YOUR TOTAL MARKET APPROACH RPM?**

A. The equity risk premium I applied to the Natural Gas Utility Proxy Group is 5.06% which is the average of the beta-adjusted equity risk premium for the Natural Gas Utility Proxy Group, the S&P Utilities Index, and the authorized return utility equity risk premium.

**Table 9: Summary of Conclusions for the Equity Risk Premium for the Natural Gas Utility Proxy Group<sup>35</sup>**

Beta-Adjusted Equity Risk Premium	5.68%
S&P Utilities Index Equity Risk Premium	4.76%
Authorized ROE Equity Risk Premium	<u>4.73%</u>
Average	<u>5.06%</u>

The equity risk premium I applied to the Electric Utility Proxy Group is 4.93% which is the average of the beta-adjusted equity risk premium for the Electric Utility Proxy Group, the S&P Utilities Index, and the authorized return utility equity risk premium.

**Table 10: Summary of Conclusions for the Equity Risk Premium for the Electric Utility Proxy Group<sup>36</sup>**

Beta-Adjusted Equity Risk Premium	5.25%
S&P Utilities Index Equity Risk Premium	4.76%
Authorized ROE Equity Risk Premium	<u>4.77%</u>
Average	<u>4.93%</u>

<sup>35</sup> As shown on page 5 of Exhibit DWD-4. The average equity risk premium is 5.01% excluding the PRPM.

<sup>36</sup> As shown on page 5 of Exhibit DWD-4. The average equity risk premium is 4.88% excluding the PRPM.

1 **Q. WHAT IS THE INDICATED RPM COMMON EQUITY COST RATE BASED ON**  
2 **THE TOTAL MARKET APPROACH?**

3 A. As shown on line 7 page 1 of Exhibit DWD-4, and shown on Tables 11 and 12, below, I  
4 calculated a common equity cost rate of 10.86% for the Natural Gas Utility Proxy Group  
5 and 10.79% for the Electric Utility Proxy Group based on the total market approach RPM.

6 **Table 11: Summary of the Total Market Return Risk Premium Model for the**  
7 **Natural Gas Utility Proxy Group<sup>37</sup>**

Prospective Moody's Utility Bond Yield Applicable to the Utility Proxy Group	5.80%
Prospective Equity Risk Premium	<u>5.06%</u>
Indicated Cost of Common Equity	10.86%

8 **Table 12: Summary of the Total Market Return Risk Premium Model for the**  
9 **Electric Utility Proxy Group<sup>38</sup>**

Prospective Moody's Utility Bond Yield Applicable to the Utility Proxy Group	5.86%
Prospective Equity Risk Premium	<u>4.93%</u>
Indicated Cost of Common Equity	10.79%

10  
11 **C. The Capital Asset Pricing Model**

12 **Q. PLEASE EXPLAIN THE THEORETICAL BASIS OF THE CAPM.**

13 A. CAPM theory defines risk as the co-variability of a security's returns with the market's  
14 returns as measured by the beta ( $\beta$ ). A beta less than 1.0 indicates lower variability than  
15 the market as a whole, while a beta greater than 1.0 indicates greater variability than the  
16 market.

17 The CAPM assumes that all other risk (i.e., all non-market or unsystematic risk)  
18 can be eliminated through diversification. The risk that cannot be eliminated through  
19 diversification is called market, or systematic, risk. In addition, the CAPM presumes that

<sup>37</sup> As shown on page 1 of Exhibit DWD-4. The RPM result excluding the PRPM is 10.81%.

<sup>38</sup> As shown on page 1 of Exhibit DWD-4. The RPM result excluding the PRPM is 10.74%.

investors require compensation only for systematic risk, which is the result of macroeconomic and other events that affect the returns on all assets. The model is applied by adding a risk-free rate of return to a market risk premium, which is adjusted proportionately to reflect the systematic risk of the individual security relative to the total market as measured by beta. The traditional CAPM model is expressed as:

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

Where:  $R_s$  = Return rate on the common stock

$R_f$  = Risk-free rate of return

$R_m$  = Return rate on the market as a whole

$\beta$  = Adjusted beta (volatility of the security relative to the market as a whole)

Numerous tests of the CAPM have measured the extent to which security returns and beta are related as predicted by the CAPM, confirming its validity. The empirical CAPM (“ECAPM”) reflects the reality that while the results of these tests support the notion that the beta is related to security returns, the empirical Security Market Line (“SML”) described by the CAPM formula is not as steeply sloped as the predicted SML.<sup>39</sup> The ECAPM reflects this empirical reality.

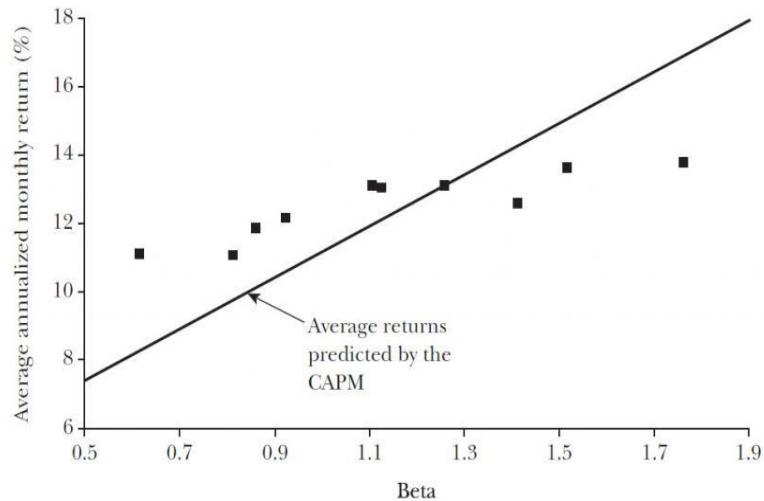
**Q. PLEASE EXPLAIN THE THEORETICAL BASIS OF THE CAPM. WHY IS THE USE OF ECAPM APPROPRIATE IN DETERMINING THE ROE FOR THE COMPANIES?**

A. The ECAPM is a well-established model that has been relied on in both academic and regulatory settings. Fama & French clearly state regarding Figure 2, below, that “[t]he returns on the low beta portfolios are too high, and the returns on the high beta portfolios are too low.”<sup>40</sup>

<sup>39</sup> Roger A. Morin, Modern Regulatory Finance (Public Utility Reports, Inc., 2021), at page 223 (“Morin”).  
<sup>40</sup> 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”).

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



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

With few exceptions, the empirical studies agree that ... low-beta securities earn returns somewhat higher than the CAPM would predict, and high-beta securities earn less than predicted.<sup>41</sup>

\* \* \*

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

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

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:

$$K = R_F + 0.25(R_M - R_F) + 0.75 \beta(R_M - R_F)^{42}$$

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

<sup>41</sup> Morin, at 207.

<sup>42</sup> Morin, at 221.

1 excess market return... This is true in the early tests... as well as in more  
2 recent cross-section regressions tests, like Fama and French (1992).<sup>43</sup>

3 Finally, Fama and French further note:

4 Confirming earlier evidence, the relation between beta and average return  
5 for the ten portfolios is much flatter than the Sharpe-Linter CAPM predicts.  
6 The returns on low beta portfolios are too high, and the returns on the high  
7 beta portfolios are too low. For example, the predicted return on the  
8 portfolio with the lowest beta is 8.3 percent per year; the actual return as  
9 11.1 percent. The predicted return on the portfolio with the t beta is 16.8  
10 percent per year; the actual is 13.7 percent.<sup>44</sup>

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

16 **Q. WHAT BETAS DID YOU USE IN YOUR CAPM ANALYSIS?**

17 A. With respect to beta, I considered two methods of calculation: (1) the average of the betas  
18 of the respective proxy group companies as reported by Bloomberg, and (2) the average of  
19 the betas of the respective proxy group companies as reported by *Value Line*. While both  
20 of those services adjust their calculated (or “raw”) betas to reflect the tendency of beta to  
21 regress to the market mean of 1.00, *Value Line* calculates beta over a five-year period, while  
22 Bloomberg’s calculation is based on two years of data.

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

24 A. As shown in Exhibit DWD-5, the risk-free rate adopted for applications of the CAPM is  
25 4.55%. This risk-free rate is based on the average of the *Blue Chip* consensus forecast of  
26 the expected yields on 30-year U.S. Treasury bonds for the six quarters ending with the

<sup>43</sup> Fama & French, at 32.

<sup>44</sup> Fama & French, at 33.

second calendar quarter of 2026, and long-term projections for the years 2026 to 2030 and 2031 to 2035.

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

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

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

A. The basis of the market risk premium is explained in detail in note 1 on page 3 of Exhibit DWD-5. As discussed above, the market risk premium is derived from an average of three historical data-based market risk premiums, one *Value Line* data-based market risk premium, and one *Value Line*, Bloomberg, and S&P Capital IQ data-based market risk premium.

The long-term income return on U.S. Government Securities of 4.99% was deducted from the monthly historical total market return of 12.29%, which results in an historical market equity risk premium of 7.31%.<sup>45</sup> I applied a linear OLS regression to the monthly annualized historical returns on the S&P 500 relative to historical yields on long-term U.S. Government Securities. That regression analysis yielded a market equity risk premium of 7.94%. The PRPM market equity risk premium is 8.18% and is derived using

<sup>45</sup> Sources: SBBI - 2023, at Appendix A-1 (1) through A-1 (3) and Appendix A-7 (19) through A-7 (21); Bloomberg Professional.

1 the PRPM relative to the yields on long-term U.S. Treasury securities from January 1926  
2 through February 2025.

3 The *Value Line*-derived forecasted total market equity risk premium is derived by  
4 deducting the forecasted risk-free rate of 4.55%, discussed above, from the *Value Line*  
5 projected total annual market return of 11.20%, resulting in a forecasted total market equity  
6 risk premium of 6.65%.

7 The S&P 500 projected market equity risk premium using *Value Line*, Bloomberg  
8 and S&P Capital IQ data is derived by subtracting the projected risk-free rate of 4.55%  
9 from the projected total return of the S&P 500 of 15.23%. The resulting market equity risk  
10 premium is 10.68%.

11 These five market risk premiums, when averaged, result in an average total market  
12 equity risk premium of 8.15%.<sup>46</sup>

13 **Table 13: Summary of the Calculation of the Market Risk Premium for Use in the**  
14 **CAPM<sup>47</sup>**

Historical Spread Between Total Returns of Large Stocks and Long-Term Government Bond Yields (1926 – 2024)	7.31%
Regression Analysis on Historical Data	7.94%
PRPM Analysis on Historical Data	8.18%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected 30-Year Treasury Bond Yields	6.65%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from for the S&P 500 less Projected 30-Year Treasury Bond Yields	<u>10.68%</u>
Average	<u>8.15%</u>

<sup>46</sup> The average market risk premium excluding the PRPM is 8.14%.

<sup>47</sup> As shown on pages 1 and 2 of Exhibit DWD-5. The average market risk premium excluding the PRPM is 8.14%.

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

3 A. As shown on page 1 of Exhibit DWD-5, the mean result of my CAPM/ECAPM analyses  
4 for the Natural Gas Utility Proxy Group is 11.10%, the median is 11.13%, and the average  
5 of the two is 11.12%. As shown on page 2 of Exhibit DWD-5, the mean result of my  
6 CAPM/ECAPM analyses for the Electric Utility Proxy Group is 10.79%, the median is  
7 10.70%, and the average of the two is 10.75%. Consistent with my reliance on the average  
8 of mean and median DCF results discussed above, the indicated common equity cost rate  
9 using the CAPM/ECAPM is 11.12% for the Natural Gas Utility Proxy Group and 10.75%  
10 for the Electric Proxy Group.

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

13 **Q. WHY DO YOU ALSO CONSIDER A PROXY GROUP OF DOMESTIC, NON-**  
14 **PRICE REGULATED COMPANIES?**

15 A. Although, I am not an attorney, my interpretation of the *Hope* and *Bluefield* cases is that  
16 they did not specify that comparable risk companies had to be utilities. Since the purpose  
17 of rate regulation is to be a substitute for marketplace competition, non-price regulated  
18 firms operating in the competitive marketplace make an excellent proxy if they are  
19 comparable in total risk to the utility proxy groups being used to estimate the cost of  
20 common equity. The selection of such domestic, non-price regulated competitive firms  
21 theoretically and empirically results in proxy groups which is comparable in total risk to  
22 the Utility Proxy Group, since all of these companies compete for capital in the exact same  
23 markets.

1   **Q.   HOW DID YOU SELECT NON-PRICE REGULATED COMPANIES THAT ARE**  
2   **COMPARABLE IN TOTAL RISK TO THE UTILITY PROXY GROUP?**

3   A.   To select proxy groups of domestic, non-price regulated companies similar in total risk to  
4   the Utility Proxy Groups, I relied on betas and related statistics derived from *Value Line*  
5   regression analyses of weekly market prices over the most recent 260 weeks (i.e., five  
6   years). As shown on Exhibit DWD-6, these selection criteria resulted in a proxy group of  
7   49 domestic, non-price regulated firms comparable in total risk to the Natural Gas Utility  
8   Proxy Group and 47 domestic, non-price regulated firms comparable in total risk to the  
9   Electric Utility Proxy Group. Total risk is the sum of non-diversifiable market risk and  
10   diversifiable company-specific risks. The criteria used in selecting the domestic, non-price  
11   regulated firms was:

- 12           (i)   They must be covered by *Value Line* (Standard Edition);
- 13           (ii)   They must be domestic, non-price regulated companies, i.e., not utilities;
- 14           (iii)   Their unadjusted betas must lie within plus or minus two standard  
15                    deviations of the average unadjusted beta of the Utility Proxy Groups; and
- 16           (iv)   The residual standard errors of the *Value Line* regressions which gave rise  
17                    to the unadjusted betas must lie within plus or minus two standard  
18                    deviations of the average residual standard error of the Utility Proxy  
19                    Groups.

20           Betas measure market, or systematic, risk, which is not diversifiable. The residual  
21   standard errors of the regressions measure each firm's company-specific, diversifiable risk.  
22   Companies that have similar betas and similar residual standard errors resulting from the  
23   same regression analyses have similar total investment risk.

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

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

8 Pages 2 and 3 of Exhibit DWD-7 derives the constant growth DCF model common  
9 equity cost rate. As shown, the indicated common equity cost rate, using the constant  
10 growth DCF for the Non-Price Regulated Proxy Group comparable in total risk to the  
11 Utility Proxy Group, is 11.87% for the Natural Gas Utility Proxy Group and 11.17% for  
12 the Electric Utility Proxy Group.

13 Pages 4 through 7 of Exhibit DWD-7 contain the data and calculations that support  
14 the 12.27% RPM common equity cost rates for the Natural Gas Utility Proxy Group and  
15 12.29% for the Electric Utility Proxy Group. As shown on line 1, page 4 of Exhibit DWD-  
16 7, the consensus prospective yield on Moody's Baa2-rated corporate bonds for the six  
17 quarters ending in the second quarter of 2026, and for the years 2026 to 2030 and 2031 to  
18 2035, is 6.14%.<sup>48</sup> Since the Non-Price Regulated Proxy Group based on the Natural Gas  
19 Utility Proxy Group has an average Moody's long-term issuer rating of A3/Baa1, it is  
20 necessary to take a one-half downward adjustment (0.14%) of the 0.27% spread between  
21 A and Baa2 corporate bond to reach an adjusted prospect bond yield of 6.01%. Since the  
22 Non-Price Regulated Proxy Group based on the Electric Utility Proxy Group has an  
23 average Moody's long-term issuer rating of A3, it is necessary to take a two-thirds

<sup>48</sup> *Blue Chip Financial Forecasts*, November 27, 2024, at 2 and February 28, 2025, at 14.

downward adjustment (0.18%) of the 0.27% spread between A and Baa2 corporate bond to reach an adjusted prospect bond yield of 5.96%.

When beta-adjusted risk premiums of 6.26% and 6.33%<sup>49</sup> relative to the Non-Price Regulated Proxy Groups are added to the prospective A3/Baa1 and A3-rated corporate bond yields of 6.01% and 5.96%, the indicated RPM common equity cost rates are 12.27% and 12.29% based on the Natural Gas and Electric Non-Price Regulated Proxy Groups, respectively.

Pages 8 and 9 of Exhibit DWD-7 contains the inputs and calculations that support my indicated CAPM/ECAPM common equity cost rates of 11.75% and 11.74% based on the Natural Gas and Electric Non-Price Regulated Proxy Groups, respectively.

**Q. WHAT IS THE COST RATE OF COMMON EQUITY BASED ON THE NON-PRICE REGULATED PROXY GROUP COMPARABLE IN TOTAL RISK TO THE UTILITY PROXY GROUP?**

A. As shown on page 1 of Exhibit DWD-7, the results of the common equity models applied to the Non-Price Regulated Proxy Groups – which is comparable in total risk to the Utility Proxy Groups – are as follows:

**Table 14: Summary of Model Results Applied to the Non-Price Regulated Proxy Group<sup>50</sup>**

	Natural Gas	Electric
Discounted Cash Flow Model	11.87%	11.17%
Risk Premium Model	12.27%	12.29%
Capital Asset Pricing Model	<u>11.75%</u>	<u>11.89%</u>
Mean	<u>11.96%</u>	<u>11.78%</u>
Median	<u>11.87%</u>	<u>11.89%</u>
Average of Mean and Median	<u>11.92%</u>	<u>11.84%</u>

<sup>49</sup> Derived on page 7 of Exhibit DWD-7.

<sup>50</sup> As shown on page 1 of Exhibit DWD-7. The average of the mean and median results excluding the PRPM are 11.91% and 11.83% based on the Natural Gas and Electric Non-Price Regulated Proxy Groups, respectively.

1 The average of the mean and median of these models is 11.92% and 11.84% based on the  
2 Natural Gas and Electric Non-Price Regulated Proxy Groups, respectively, which I used as  
3 the indicated common equity cost rates for the Non-Price Regulated Proxy Groups.

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

5 **Q. WHAT ARE THE INDICATED COMMON EQUITY COST RATES BEFORE**  
6 **ADJUSTMENTS?**

7 A. The range of indicated ROEs produced from my analysis is from 10.29% (DCF model) to  
8 11.92% (Non-Price Regulated Market Models), which is applicable to the Natural Gas  
9 Utility Proxy Group as shown on Exhibit DWD-1, page 2. The range of indicated ROEs  
10 produced from my analysis is from 10.32% (DCF model) to 11.84% (Non-Price Regulated  
11 Market Models), which is applicable to the Electric Utility Proxy Group as shown on  
12 Exhibit DWD-1, page 3. I used multiple cost of common equity models as primary tools  
13 in arriving at my recommended common equity cost rate, because no single model is so  
14 inherently precise that it can be relied on to the exclusion of other theoretically sound  
15 models. Using multiple models adds reliability to the estimated common equity cost rate,  
16 with the prudence of using multiple cost of common equity models supported in both the  
17 financial literature and regulatory precedent. In view of these results, I recommend a range  
18 of ROEs applicable to the Utility Proxy Groups between 10.29% and 11.92% based on the  
19 Natural Gas Utility Proxy Group and 10.32% and 11.84% based on the Electric Utility  
20 Proxy Group. As previously noted, whether or not the PRPM is excluded from the  
21 analytical models does not have a material effect on my recommended range.

22 As will be discussed below, LGE and KU have unique company-specific risk  
23 factors relative to the Utility Proxy Groups. Because of this, the indicated range of model

1 results based on the Utility Proxy Groups must be adjusted to reflect LGE's and KU's  
2 relative risk.

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

4 **Q. DID THE COMMISSION REJECT RELATIVE RISK ADJUSTMENTS TO THE**  
5 **ROE IN PRIOR CASES?**

6 A. Yes, it did. In Case No. 2021-00214 concerning Atmos Energy the Commission stated:

7 The Commission reiterates that it continues to reject use of flotation cost  
8 adjustments, financial risk adjustments, and size adjustments in the ROE  
9 analyses.<sup>51</sup>

10 In Case No. 2022-00432 the Commission stated:

11 Additionally, the Commission further reiterates that it continues to reject  
12 the use of flotation cost adjustments, financial risk adjustments and explicit  
13 size adjustments in the ROE analyses considering a business risk or size  
14 adjustment has not be approved in the past and the Commission agrees with  
15 the Attorney General on that matter.<sup>52</sup>

16 **Q. DO YOU HAVE A RESPONSE TO THE COMMISSION'S STATEMENT?**

17 A. Yes, I do. I respectfully disagree with the Commission's rejection of company-specific  
18 risk adjustments as stated in their Final Orders in Case Nos. 2021-00214 and in Case No.  
19 2022-00432. As will be explained in detail below, the adjustments applied to the indicated  
20 range of ROEs applicable to the Utility Proxy Group to reflect the Companies' specific  
21 risks are academically and empirically supported.

22 **Q. DOES THE COMMISSION IMPLICITLY CONSIDER A COMPANY'S UNIQUE**  
23 **RISKS IN DETERMINING THEIR ROE?**

24 A. Yes, it does. In Case No. 2021-00214 the Commission stated:

25 An ROE of 9.23 percent is lower than recent Commission awards for gas

<sup>51</sup> *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates, Kentucky Public Service Commission, Kentucky Public Service Commission, Final Order, Case No. 2021-00214, May 19, 2022, at 48.*

<sup>52</sup> *Electronic Application of Bluegrass Water Utility Operating Company, LLC for an Adjustment of Sewage Rates, Kentucky Public Service Commission, Final Order, Case No. 2022-00432, February 14, 2024, at 91.*

1 utilities, but those awards were tied to stay-out clauses **for a utility that is**  
2 **significantly smaller**, rural and had not requested a rate increase for over  
3 ten years. Additionally, in deciding upon the approved ROE, the  
4 Commission is also balancing the recent destruction due to the devastating  
5 tornadoes and customer bill impact during the region's recovery, **as well as**  
6 **the still high equity percentage.** (emphasis added)<sup>53</sup>

7 While this Commission does not specifically assign basis points to a company's  
8 unique risks as compared to a proxy group, they are clearly considered in the above  
9 passage.

10 **A. Size Adjustment**

11 **Q. DOES LGE'S AND KU'S SMALLER SIZE RELATIVE TO THE UTILITY PROXY**  
12 **GROUP COMPANIES INCREASE THEIR BUSINESS RISK?**

13 A. Yes. LGE's and KU's smaller size relative to the Utility Proxy Group companies indicates  
14 greater relative business risk for the Company because, all else being equal, size has a  
15 material bearing on risk.

16 Size affects business risk because smaller companies generally are less able to cope  
17 with significant events that affect sales, revenues and earnings. For example, smaller  
18 companies face more risk exposure to business cycles and economic conditions, both  
19 nationally and locally. Additionally, the loss of revenues from a few larger customers  
20 would have a greater effect on a small company than on a bigger company with a larger,  
21 more diverse, customer base.

22 Investors generally demand greater returns from smaller firms to compensate for  
23 less marketability and liquidity of their securities. Kroll discusses the nature of the small-  
24 size phenomenon, providing an indication of the magnitude of the size premium based on

<sup>53</sup> *Electronic Application of Atmos Energy Corporation for an Adjustment of Rates, Kentucky Public Service Commission, Kentucky Public Service Commission, Final Order, Case No. 2021-00214, May 19, 2022, at 48.*

several measures of size. In discussing “Size as a Predictor of Equity Premiums,” Kroll states:

The size effect is based on the empirical observation that companies of smaller size are associated with greater risk and, therefore, have greater cost of capital [sic]. The “size” of a company is one of the most important risk elements to consider when developing cost of equity capital estimates for use in valuing a business simply because size has been shown to be a *predictor* of equity returns. In other words, there is a significant (negative) relationship between size and historical equity returns - as size *decreases*, returns tend to *increase*, and vice versa. (footnote omitted) (emphasis in original)<sup>54</sup>

Furthermore, in “The Capital Asset Pricing Model: Theory and Evidence,” Fama and French note size is indeed a risk factor which must be reflected when estimating the cost of common equity. On page 38, they note:

. . . the higher average returns on small stocks and high book-to-market stocks reflect unidentified state variables that produce undiversifiable risks (covariances) in returns not captured in the market return and are priced separately from market betas.<sup>55</sup>

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

Also, it is a basic financial principle that the use of funds invested, and not the source of funds, is what gives rise to the risk of any investment.<sup>56</sup> Eugene Brigham, a well-known authority, states:

A number of researchers have observed that portfolios of small-firms (sic) have earned consistently higher average returns than those of large-firm stocks; this is called the “small-firm effect.” On the surface, it would seem to be advantageous to the small firms to provide average returns in a stock market that are higher than those of larger firms. In reality, it is bad news for the small firm; **what the small-firm effect means is that the capital**

<sup>54</sup> Kroll, Cost of Capital Navigator: U.S. Cost of Capital Module, Size as a Predictor of Returns, at 1.

<sup>55</sup> Eugene F. Fama and Kenneth R. French, “The Capital Asset Pricing Model: Theory and Evidence,” *Journal of Economic Perspectives*, Volume 18, Number 3, Summer 2004, at 25-43.

<sup>56</sup> Brealey, Richard A. and Myers, Stewart C., Principles of Corporate Finance (McGraw-Hill Book Company, 1996), at 204-205, 229.

1 market demands higher returns on stocks of small firms than on  
2 otherwise similar stocks of the large firms. (emphasis added)<sup>57</sup>

3 Consistent with the financial principle of risk and return discussed above, increased  
4 relative risk due to small size must be considered in the allowed rate of return on common  
5 equity. Therefore, the Commission's authorization of a cost rate of common equity in these  
6 proceedings must appropriately reflect the unique risks of LGE and KU, including their  
7 small size, which is justified and supported above by evidence in the financial literature.

8 **Q. IS THERE A WAY TO QUANTIFY A RELATIVE RISK ADJUSTMENT DUE TO**  
9 **LGE'S AND KU'S SMALL SIZE RELATIVE TO THE UTILITY PROXY GROUP?**

10 A. Yes. LGE and KU have greater relative risk than the average utility in the Utility Proxy  
11 Groups because of its smaller size compared with the utilities in that group, as measured  
12 by an estimated market capitalization of common equity for LGE and KU.

13 **Table 15: Size as Measured by Market Capitalization for the Companies and the**  
14 **Utility Proxy Groups**

	<u>Market Capitalization*</u> (\$ Millions)	<u>Times Greater than The Company</u>
Louisville Gas & Electric – Gas	\$1,174.887	
Natural Gas Utility Proxy Group	\$4,721.136	4.0x
Louisville Gas & Electric – Electric	\$3,970.346	2.6x
Kentucky Utilities Operations	\$6,462.402	4.2x
Electric Utility Proxy Group	\$16,525.930	
*From page 1 of Exhibit DWD-8.		

<sup>57</sup> Brigham, Eugene F., Fundamentals of Financial Management, Fifth Edition (The Dryden Press, 1989), at 623.

1 LGE's estimated market capitalization was \$1.175 billion<sup>58</sup> as of February 28, 2025  
2 for its natural gas operations and \$3.970 billion<sup>59</sup> for its electric operations. KU's estimated  
3 market capitalization was \$6.462 billion<sup>60</sup> as of February 28, 2025. The market  
4 capitalizations of the median company in the Natural Gas and Electric Utility Proxy Groups  
5 are \$4.721 billion and \$16.526 billion as of February 28, 2025, respectively. The average  
6 company in the Natural Gas Utility Proxy Group has a market capitalization 4.0 times the  
7 size of LGE's estimated market capitalization and the average company in the Electric  
8 Utility Proxy Group has a market capitalization 4.2 times the size of LGE's and 2.6 times  
9 the size of KU's.

10 As a result, it is necessary to upwardly adjust the range of indicated common equity  
11 cost rates to reflect the Companies' greater risk due to their smaller relative size. The  
12 determination is based on the size premiums for portfolios of New York Stock Exchange,  
13 American Stock Exchange, and NASDAQ listed companies ranked by deciles for the 1926  
14 to 2024 period. The median size premium for the Natural Gas Utility Proxy Group with a  
15 market capitalization of \$4.721 billion falls in the 4<sup>th</sup> decile and the median size premium  
16 for the Electric Utility Proxy Group with a market capitalization of \$16.526 billion falls in  
17 the 2<sup>nd</sup> decile. LGE's estimated natural gas market capitalization of \$1.175 billion places it  
18 in the 7<sup>th</sup> decile, LGE's estimated electric market capitalization of \$3.970 billion places it  
19 in the 5<sup>th</sup> decile, and KU's estimated electric market capitalization of \$6.462 billion places  
20 it in the 4<sup>th</sup> decile. The size premium spread between the 4<sup>th</sup> decile and the 7<sup>th</sup> decile is  
21 0.75%. The size premium spread between the 2<sup>nd</sup> decile and the 4<sup>th</sup> and 5<sup>th</sup> deciles is 0.18%

<sup>58</sup> \$1,376,562,199 (requested rate base) \* 52.93% (proposed capital structure) \* 162.3% (market-to-book ratio of the Natural Gas Utility Proxy Group) as demonstrated on page 2 of Exhibit DWD-8.

<sup>59</sup> \$3,626,678,121 (requested rate base) \* 52.93% (proposed capital structure) \* 200.6% (market-to-book ratio of the Electric Utility Proxy Group) as demonstrated on page 2 of Exhibit DWD-8.

<sup>60</sup> \$5,965,326,053 (requested rate base) \* 52.86% (proposed capital structure) \* 200.6% (market-to-book ratio of the Electric Utility Proxy Group) as demonstrated on page 2 of Exhibit DWD-8.

1 and 0.49%, respectively. Even though a 0.18% to 0.75% upward size adjustment is  
2 indicated, I conservatively applied a size premium of 0.05% for KU, 0.10% for LGE's  
3 electric operations, and 0.15% for LGE's natural gas operations to the Companies' range  
4 of indicated common equity cost rates.

5 **Q. SHOULD THE COMMISSION CONSIDER LGE'S AND KU'S OPERATIONS AS**  
6 **A STAND-ALONE COMPANIES?**

7 A. Yes, it should. Because it is LGE's and KU's Kentucky rate base to which the overall rates  
8 of return set forth in these proceedings will be applied, they should be evaluated as stand-  
9 alone entities. To do otherwise would be discriminatory, confiscatory, and inaccurate. It  
10 is also a basic financial precept that the use of the funds invested give rise to the risk of the  
11 investment. As Brealey and Myers state:

12 *The true cost of capital depends on the use to which the capital is put.*

13 \*\*\*

14 ***Each project should be evaluated at its own opportunity cost of capital;***  
15 ***the true cost of capital depends on the use to which the capital is put.***  
16 **(italics and bold in original) <sup>61</sup>**

17 Morin confirms Brealey and Myers when he states:

18 Financial theory clearly establishes that the cost of equity is the risk-  
19 adjusted opportunity cost of the investors and not the cost of the specific  
20 capital sources employed by the investors. The true cost of capital depends  
21 on the use to which the capital is put and not on its source. The Hope and  
22 Bluefield doctrines have made clear that the relevant considerations in  
23 calculating a company's cost of capital are the alternatives available to  
24 investors and the returns and risks associated with those alternatives.<sup>62</sup>

25 Additionally, Levy and Sarnat state:

26 The firm's cost of capital is the discount rate employed to discount the firm's  
27 average cash flow, hence obtaining the value of the firm. It is also the  
28 weighted average cost of capital, as we shall see below. The weighted

<sup>61</sup> Richard A. Brealey and Stewart C. Myers, Principles of Corporate Finance, McGraw-Hill, Third Edition, 1988, at 173, 198.

<sup>62</sup> Morin, at 581.

1 average cost of capital should be employed for project evaluation... only  
2 in cases where the risk profile of the new projects is a “carbon copy” of the  
3 risk profile of the firm.<sup>63</sup>

4 Although Levy and Sarnat discuss a project’s cost of capital relative to a firm’s cost  
5 of capital, these principles apply equally to the use of a proxy group-based cost of capital.  
6 Each company must be viewed on its own merits, regardless of the source of its equity  
7 capital. As *Bluefield* clearly states:

8 A public utility is entitled to such rates as will permit it to earn a return on  
9 the value of the property which it employs for the convenience of the public  
10 equal to that generally being made at the same time and in the same general  
11 part of the country on investments in other business undertakings which are  
12 attended by corresponding risks and uncertainties;<sup>64</sup>

13 In other words, it is the “risks and uncertainties” surrounding the property employed  
14 for the “convenience of the public” which determines the appropriate level of rates. In  
15 these proceedings, the property employed “for the convenience of the public” is the rate  
16 base of LGE’s and KU’s Kentucky operations. Thus, it is only the risk of investment in  
17 LGE’s and KU’s Kentucky operations that is relevant to the determination of the cost of  
18 common equity to be applied to the common equity-financed portion of that rate base.

19 In addition, in the Fama and French article previously cited, the authors<sup>65</sup> proposed  
20 that their three-factor model include the SMB (Small Minus Big) factor, which indicates  
21 that small capitalization firms are more risky than large capitalization firms, confirming  
22 that size is a risk factor which must be taken into account in estimating the cost of common  
23 equity.

24 Consistent with the financial principle of risk and return discussed previously, and  
25 the stand-alone nature of ratemaking, an upward adjustment must be applied to the

<sup>63</sup> Haim Levy & Marshall Sarnat, Capital Investment and Financial Decisions, Prentice/Hall International, 1986, at 465.

<sup>64</sup> *Bluefield*, at 6.

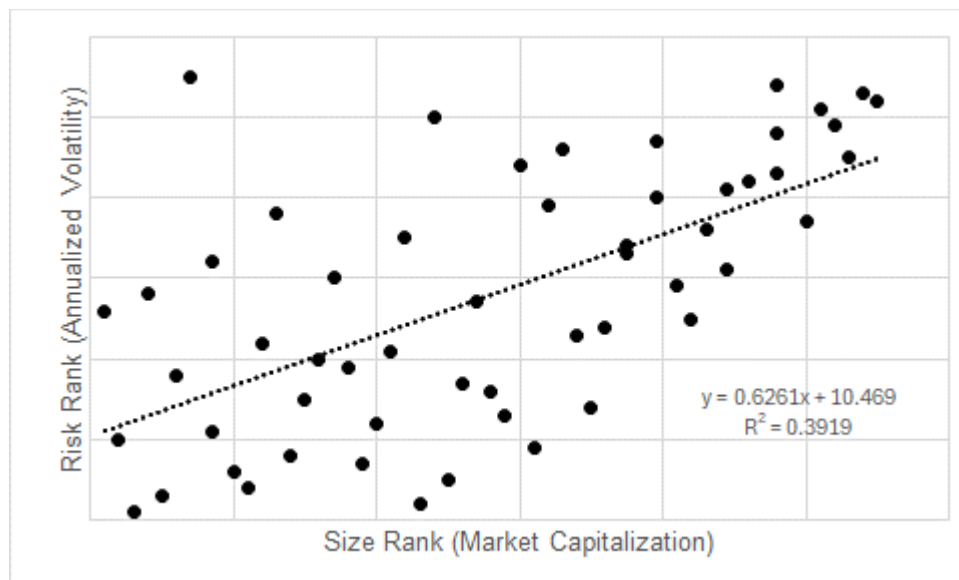
<sup>65</sup> Fama & French, at 39.

1 indicated cost of common equity derived from the cost of equity models of the proxy  
2 groups used in these proceedings.

3 **Q. HAVE YOU CONDUCTED STUDIES TO DETERMINE IF SIZE AND RISK FOR**  
4 **UTILITIES IS RELATED?**

5 A. Yes. I have performed two studies which link size and risk for utilities and show that utility  
6 companies become riskier as their size decreases. The first study included the universe of  
7 electric, gas, and water companies included in *Value Line* Standard Edition. I calculated  
8 the annualized volatility (a measure of risk) for each of the utilities and relied on the current  
9 market capitalization (a measure of size) as reported by *Value Line* for each company.  
10 After ranking the companies by size (largest to smallest) and risk (least risky to most risky),  
11 I made a scatter plot of the data, as shown on Chart 1, below:

12 **Chart 1: Relationship Between Size and Risk**  
13 **for the *Value Line* Universe of Utility Companies<sup>66</sup>**



14  
15 As shown in Chart 1 above, as company size decreases (increasing size rank), the  
16 annualized volatility increases, linking size and risk for utilities, which is significant at  
17 95.0% confidence level.

<sup>66</sup> Source: *Value Line*.

The second study used the same universe of companies, but instead of using annualized volatility, I used the *Value Line* Safety Ranking, which is another measure of total risk.<sup>67</sup> After ranking the companies by size and Safety Ranking, I made a scatterplot of those data, as shown on Chart 2, below.

**Chart 2: Relationship Between Size and Safety Ranking for the *Value Line* Universe of Utility Companies<sup>68</sup>**



Similar to the first study, as company size decreases, Safety Ranking degrades, indicating a link between size and risk for utilities. This study is also significant at the 95% confidence level.

In view of the evidence in the academic literature regarding the presence of the size premium and the empirical evidence of a link between size and risk for utility companies, I strongly urge the Commission to reconsider its position on granting premiums for small relative size.

<sup>67</sup> *Value Line* also ranks stocks for Safety by analyzing the total risk of a stock compared to the approximately 1,700 stocks in the *Value Line* universe. Each of the stocks tracked in the *Value Line Investment Survey* is ranked in relationship to each other, from 1 (the highest rank) to 5 (the lowest rank). Safety is a quality rank, not a performance rank, and stocks ranked 1 and 2 are most suitable for conservative investors; those ranked 4 and 5 will be more volatile. Volatility means prices can move dramatically and often unpredictably, either down or up. The major influences on a stock's Safety rank are the company's financial strength, as measured by balance sheet and financial ratios, and the stability of its price over the past five years.

<sup>68</sup> Source: *Value Line*.

1           **B.     Credit Risk Adjustment**

2           **Q.     PLEASE DISCUSS YOUR PROPOSED CREDIT RISK ADJUSTMENT.**

3           A.     LGE's and KU's long-term issuer ratings are A3 and A- from Moody's and S&P,  
4                 respectively. The average long-term ratings for the Natural Gas Utility Proxy Group are  
5                 similarly of A3 and A- from Moody's and S&P, respectively.<sup>69</sup> As such, no credit risk  
6                 adjustment is necessary as it relates to the Natural Gas Utility Proxy Group. The average  
7                 long-term ratings for the Electric Utility Proxy Group are Baa1 and A- from Moody's and  
8                 S&P, respectively.<sup>70</sup> Hence, a downward credit risk adjustment is necessary to reflect the  
9                 less risky credit rating, i.e., A3, of LGE and KU relative to the Baa1 average Moody's bond  
10                rating of the Electric Utility Proxy Group.<sup>71</sup>

11                An indication of the magnitude of the necessary downward adjustment to reflect  
12                the lower credit risk inherent in an A3 bond rating is one-third of a recent three-month  
13                average spread between Moody's Baa2 and A2-rated public utility bond yields of 0.20%,  
14                shown on page 2 of Exhibit DWD-1, or 0.07%.<sup>72</sup>

15           **Q.     WHY IS IT IMPORTANT THAT YOU MAKE A CREDIT RISK ADJUSTMENT?**

16           A.     It is important to reflect a company's relative financial risk, as companies with riskier bond  
17                 ratings have a higher risk of default, and because of that, equity investors would require a  
18                 higher return on their investment. To illustrate the risk of default related to changes in  
19                 bond rating, Chart 3 below presents Moody's Idealized Cumulative Expected Default Rates  
20                 for debt obligations with maturities lasting 30-years based on the respective rating.

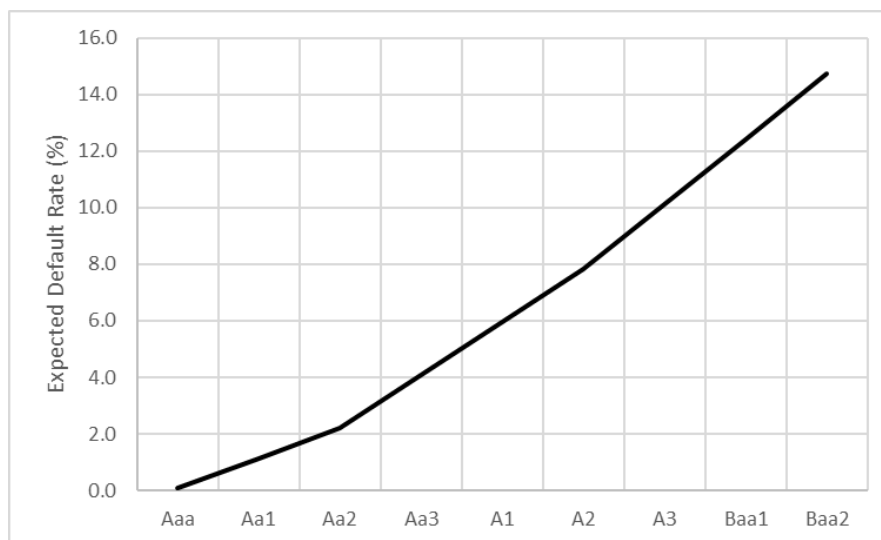
<sup>69</sup>       Source of Information: S&P Capital IQ.

<sup>70</sup>       Source of Information: S&P Capital IQ.

<sup>71</sup>       As shown on page 3 of Exhibit DWD-4.

<sup>72</sup>        $1/3 * 0.20\% = 0.07\%$ .

**Chart 3: Moody's Idealized Cumulative Expected Default Rates Based on Debt Obligations with 30-Year Maturities**



As shown in Chart 3, Moody's notes an observable difference in the default rates based on each respective rating. Therefore, even though credit ratings might be similar, the default rates indicate that different ratings equate to different risks.

### **C. Flotation Cost Adjustment**

#### **Q. WHAT ARE FLOTATION COSTS?**

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

#### **Q. WHY IS IT IMPORTANT TO RECOGNIZE FLOTATION COSTS IN THE ALLOWED COMMON EQUITY COST RATE?**

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

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

4 The simple fact of the matter is that common equity capital is not  
5 free....[Flotation costs] must be recovered through a rate of return  
6 adjustment.<sup>73</sup>

7 **Q. SHOULD FLOTATION COSTS BE RECOGNIZED ONLY IF THERE WAS AN**  
8 **ISSUANCE DURING THE TEST YEAR OR THERE IS AN IMMINENT POST-**  
9 **TEST YEAR ISSUANCE OF ADDITIONAL COMMON STOCK?**

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

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

<sup>73</sup> Morin, at 329.

1 with an assumed investor required return of 10% is for the net investment, \$0.95, to earn  
2 more than 10% to net back to the investor a fair return on that dollar. In other words, if a  
3 company issues stock at \$1.00 with 5% in flotation costs, it will net \$0.95 in investment.  
4 Assuming the investor in that stock requires a 10% return on his or her invested \$1.00 (i.e.,  
5 a return of \$0.10), the company needs to earn approximately 10.5% on its invested \$0.95  
6 to receive a \$0.10 return.

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

9 A. No. All of these models assume no transaction costs. The literature is quite clear that these  
10 costs are not reflected in the market prices paid for common stocks. For example, Brigham  
11 and Daves confirm this and provide the methodology utilized to calculate the flotation  
12 adjustment.<sup>74</sup> In addition, Morin confirms the need for such an adjustment even when no  
13 new equity issuance is imminent.<sup>75</sup> Consequently, it is proper to include a flotation cost  
14 adjustment when using cost of common equity models to estimate the common equity cost  
15 rate.

16 **Q. CAN YOU PROVIDE AN EXAMPLE OF WHY THE ROE MUST INCLUDE**  
17 **FLOTATION COSTS TO REALIZE ITS REQUIRED RETURN?**

18 A. Yes, I can. As shown in Exhibit DWD-9, because of flotation costs, an authorized return  
19 of 10.85% would be required to realize an ROE of 10.75% (i.e., a 10-basis point flotation  
20 cost adjustment). If flotation costs are not recovered, the growth rate falls and the ROE  
21 decreases to 10.65% (i.e., below the required return).<sup>76</sup>

<sup>74</sup> Eugene F. Brigham and Phillip R. Daves, Intermediate Financial Management, 9th Edition, Thomson/Southwestern, at 342.

<sup>75</sup> Morin, at 337-339.

<sup>76</sup> Exhibit DWD-9 is provided for illustrative purposes only. Please note that I have not relied on the results of the analysis in determining my recommended ROE or range.

1 **Q. HOW DID YOU CALCULATE THE FLOTATION COST ALLOWANCE?**

2 A. I modified the DCF calculation to provide a dividend yield that would reimburse investors  
3 for issuance costs in accordance with the method cited in literature by Brigham and Daves,  
4 as well as by Morin. The flotation cost adjustment recognizes the actual costs of issuing  
5 equity that were incurred by PPL in its equity issuances. Based on the issuance costs shown  
6 on page 1 of Exhibit DWD-10, an adjustment of 0.15% is required to reflect the flotation  
7 costs applicable to the Utility Proxy Group.

8 **Q. PLEASE SUMMARIZE YOUR ADJUSTMENTS TO THE INDICATED RANGES**  
9 **OF ROES APPLICABLE TO THE UTILITY PROXY GROUPS.**

10 A. The summary of my adjustments to the indicated ranges of the ROEs applicable to the  
11 Utility Proxy Groups are as follows:

12 **Table 16: Summary of Adjustments to the Indicated Ranges of ROEs Applicable to**  
13 **the Utility Proxy Groups**

	Louisville Gas & Electric		Kentucky Utilities
	Natural Gas	Electric	Electric
Indicated Range Before Adjustment	10.29% - 11.92%	10.32% - 11.84%	10.32% - 11.84%
Size Adjustment	0.15%	0.10%	0.05%
Credit Risk Adjustment	0.00%	-0.07%	-0.07%
Flotation Cost Adjustment	<u>0.15%</u>	<u>0.15%</u>	<u>0.15%</u>
Indicated Range After Adjustment	<u>10.59% - 12.22%</u>	<u>10.51% - 12.03%</u>	<u>10.46% - 11.98%</u>

14 As shown on Table 16, the range of ROEs applicable to the Companies are between  
15 10.59% and 12.22% for the Natural Gas Utility Proxy Group and 10.46% and 11.98% (KU)  
16 and 10.51% and 12.03% (LGE) for the Electric Utility Proxy Group.

1           **D.     Other Considerations**

2   **Q.     PLEASE BRIEFLY SUMMARIZE THE COMPANY’S CAPITAL INVESTMENT**  
3   **PLANS.**

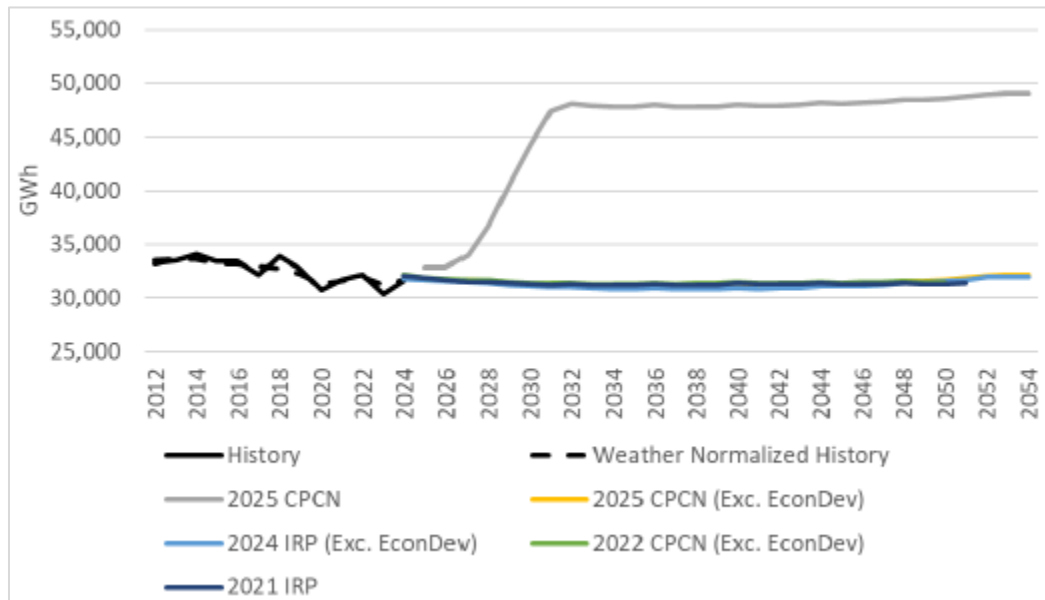
4   A.     LGE and KU currently plan to invest approximately \$3.85 billion and \$3.53 of additional  
5           capital over the 2025-2027 period, respectively,<sup>77</sup> which represents approximately 58.8%  
6           and 42.3% of its 2024 net utility plant, respectively.<sup>78</sup> That amount includes investments  
7           required to support increasing growth, and to maintain safe, sufficient, and reliable service  
8           in both its transmission and distribution facilities. Growth in the Company’s service  
9           territory is substantially driven by projected demand from data centers. The Kentucky  
10          General Assembly supports the growth in data centers, noting “the inducement of the  
11          location of data center projects within the Commonwealth is of paramount importance to  
12          the economic well-being of the Commonwealth.”<sup>79</sup> The gray line in Chart 4, below,  
13          represents the current combined load forecast of LGE and KU, which shows a substantial  
14          increase in load in the coming decade.

<sup>77</sup> PPL Corporation SEC Form 10-K for the Fiscal Year Ended December 31, 2024, at 51.

<sup>78</sup> Source: PPL Corporation SEC Form 10-K for the Fiscal Year Ended December 31, 2024, at 86 and 92.

<sup>79</sup> Kentucky Statute 154.20-222(3), Purposes -- Legislative findings and declarations.

Chart 4: Louisville Gas & Electric and Kentucky Utilities Load Forecast<sup>80</sup>



Meeting the projected growth in LGE's and KU's service territory will require significant investment in new supply resources and infrastructure.

The Companies will require continued access to the capital markets at reasonable terms to finance its capital spending plan. As the Companies move forward with their capital spending plan, timely recovery of its capital costs is critical to mitigate the delay of capital recovery and execute its capital spending program.

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

A. Yes, they do. The allowed ROE should enable the subject utility to finance capital expenditures and working capital requirements at reasonable rates and to maintain its financial integrity in a variety of economic and capital market conditions. As discussed

<sup>80</sup> Wilson Direct Testimony, Exhibit SAW-1, *Electronic Application of Kentucky Utilities Company and Louisville Gas and Electric Company for the Certificates of Public Convenience and Necessity and Site Compatibility Certificates*, Kentucky Public Service Commission, Case No. 2025-00045, February 28, 2025, at 5.

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

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

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

19 **Q. DO CREDIT RATING AGENCIES RECOGNIZE RISK ASSOCIATED WITH**  
20 **INCREASED CAPITAL EXPENDITURES?**

21 A. Yes, they do. From a credit perspective, the additional pressure on cash flows associated  
22 with high levels of capital expenditures exerts corresponding pressure on credit metrics  
23 and, therefore, credit ratings. Specifically, S&P notes, "Given our expectations for

1 continued increasing capital spending over the next decade, we expect financial  
2 performance and credit quality will continue to be pressured.”<sup>81</sup>

3 The rating agency views noted above also are consistent with certain observations  
4 discussed in my direct testimony: (1) the benefits of maintaining a strong financial profile  
5 are significant when capital access is required and become particularly acute during periods  
6 of market instability; and (2) the Commission’s decision in these proceedings will have a  
7 direct bearing on the Company’s credit profile and its ability to access the capital needed  
8 to fund its investments.

9 **Q. DOES ELEVATED LEVELS OF INFLATION INCREASE RISK AS IT PERTAINS**  
10 **TO THE COMPANY’S CAPITAL EXPENDITURE PLAN?**

11 A. Yes. Increased inflation increases risk for the Company in two ways: (1) the costs to make  
12 capital expenditures (*e.g.*, raw materials, labor) will increase, leading the Company to go  
13 to the market to raise larger amounts of capital as it would otherwise do in a non-  
14 inflationary environment; and (2) as inflation is positively correlated to capital costs, the  
15 financing of the increased costs will be more expensive than it would be in a non-  
16 inflationary environment.

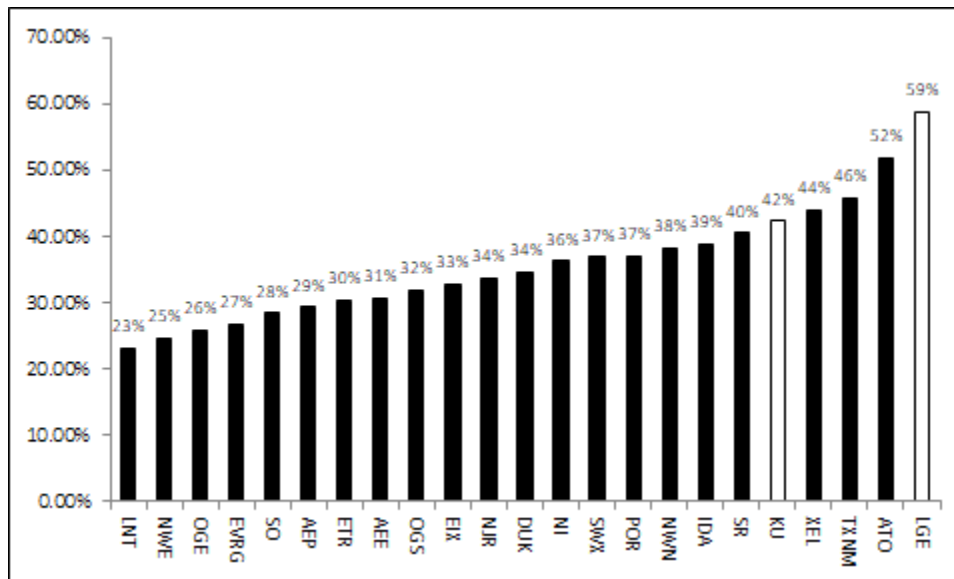
17 **Q. HOW DO THE COMPANIES’ EXPECTED CAPITAL EXPENDITURES**  
18 **COMPARE TO THE UTILITY PROXY GROUP?**

19 A. To reasonably make that comparison, I calculated the ratio of expected capital expenditures  
20 to net plant for each company in the Utility Proxy Group. I performed that calculation  
21 using LGE’s and KU’s projected capital expenditures during 2025 through 2027 relative  
22 to its net plant for the year ended December 31, 2024. As shown in Exhibit DWD-11 and  
23 Chart 5, below, the companies have ratios of projected capital expenditures to net plant

<sup>81</sup> S&P Global Ratings, Industry Credit Outlook 2025: North America Regulated Utilities, January 14, 2025, at 10.

relative to the Natural Gas and Electric Utility Proxy Groups, approximately 25% (KU) and 74% (LGE) higher than the median of the proxy companies.

**Chart 5: Capital Expenditures to Net Plant<sup>82</sup>**



**Q. DO THE COMPANIES' UTILIZATION OF REVENUE STABILIZATION MECHANISMS AFFECT ITS RELATIVE RISK TO THE UTILITY PROXY GROUP?**

**A.** No. The *Hope* and *Bluefield* “Comparable Earnings” standard requires the allowed ROE to be commensurate with the returns on investments of similar risk. The cost of capital is a comparative exercise, so if mechanisms are common throughout the companies on which one bases their analyses, the comparative risk is zero, because any effect of the perceived reduced risk of the mechanism(s) by investors would be reflected in the market data of the proxy group. To the extent the proxy companies have mechanisms in place to address

<sup>82</sup> Source: Value Line, PPL Corporation SEC Form 10-K for the Fiscal Year Ended December 31, 2024, at 51.

1 revenue shortfalls and cost recovery, the Companies' mechanisms only serve to make it  
2 more comparable to its peers and have no impact on comparative risk.

3 To that point, Exhibit DWD-12 provides a summary of rate stabilization  
4 mechanisms currently in effect at each natural gas subsidiary within the companies in the  
5 Natural Gas Utility Proxy Group and at each electric utility subsidiary within the  
6 companies in the Electric Utility Proxy Group. As Exhibit DWD-12 demonstrates,  
7 recovery mechanisms are common among the Natural Gas and Electric Utility Proxy  
8 Groups.

9 **Q. ARE YOU AWARE OF ANY STUDIES THAT HAVE ADDRESSED THE**  
10 **RELATIONSHIP BETWEEN RATE STABILIZATION MECHANISMS,**  
11 **GENERALLY, AND ROE?**

12 A. Yes. In March 2014, The Brattle Group ("Brattle") published a study addressing the effect  
13 of revenue decoupling structures on the cost of capital for electric utilities. In its report,  
14 which extended a prior analysis focused on natural gas distribution utilities, Brattle pointed  
15 out that although decoupling structures may affect revenue, net income still can vary.  
16 Brattle further noted that the distinction between diversifiable and non-diversifiable risk is  
17 important to equity investors, and the relationship between decoupling and the cost of  
18 equity should be examined in that context. Further to that point, Brattle noted that although  
19 reductions in total risk may be important to bondholders, only reductions in non-  
20 diversifiable business risk would justify a reduction to the ROE. In November 2016, the  
21 Brattle study was updated based on data through the fourth quarter of 2015.

22 Brattle's empirical analysis examined the relationship between decoupling and the  
23 After-Tax Weighted Average Cost of Capital for a group of electric utilities that had  
24 implemented decoupling structures in various jurisdictions throughout the United States.

1 As with Brattle's 2014 study, the updated study found no statistically significant link  
2 between the cost of capital and revenue decoupling structures.

3 In addition, I co-authored a peer-reviewed article in Energy Policy with Dr. Richard  
4 A. Michelfelder and my colleague Pauline M. Ahern which examines the relationship  
5 between decoupling and ROE among electric, gas, and water utilities. Using the  
6 generalized consumption asset pricing model, they found decoupling to have no  
7 statistically significant effect on investor perceived risk and the ROE.

8 **Q. WHAT ARE YOUR CONCLUSIONS REGARDING THE EFFECT OF THE**  
9 **COMPANY'S REVENUE STABILIZATION MECHANISMS ON ROE?**

10 A. The presence of LGE's and KU's revenue stabilization mechanisms do not affect the  
11 Companies' ROEs. Those mechanisms do not affect the ROE because the operating  
12 companies of the Utility Proxy Group utilize a wide range of revenue stabilization  
13 mechanisms. Since this is the case, the lower risk of having such mechanisms (if any)  
14 would already be subsumed in the market data for the Utility Proxy Groups.

15 Furthermore, several studies show that rate stabilization mechanisms do not  
16 materially affect the investor-required return for those companies. Given that, the  
17 Companies' mechanisms do not lower the comparative risk of the Companies relative to  
18 the Utility Proxy Groups and therefore, the ROE should not be adjusted due to the  
19 Companies' mechanisms.

20 **IX. CONCLUSION**

21 **Q. WHAT IS YOUR RECOMMENDED ROE FOR LGE AND KU?**

22 A. Given the indicated ROE ranges applicable to the Utility Proxy Groups and the Companies,  
23 I conclude that an appropriate ROE for the Companies is 10.95%.

1   **Q.    IN YOUR OPINION, IS YOUR PROPOSED ROE OF 10.95% FAIR AND**  
2       **REASONABLE TO LGE, KU, AND ITS CUSTOMERS?**

3   **A.    Yes, it is.**

4   **Q.    DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

5   **A.    Yes, it does.**

VERIFICATION

STATE OF NEW JERSEY

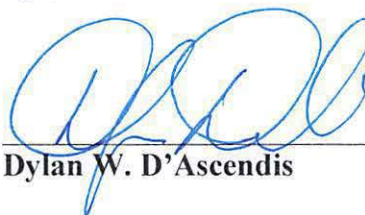
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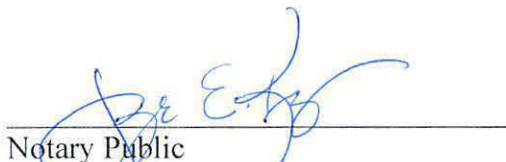
COUNTY OF CAMDEN

)

The undersigned, **Dylan W. D'Ascendis**, being duly sworn, deposes and says that he is a Partner with ScottMadden Inc., that he has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.

  
Dylan W. D'Ascendis

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 27<sup>th</sup> day of May 2025.

  
Notary Public

Notary Public ID No. 2416714

My Commission Expires:

February 1, 2027

Joyce E Kelly  
NOTARY PUBLIC  
State of New Jersey  
ID # 2416714  
My Commission Expires 2/1/2027



Kentucky Utilities Company / Louisville Gas & Electric Company  
Brief Summary of Common Equity Cost Rate

Line No.	Principal Methods	Proxy Group of Seven Natural Gas Distribution Companies	Proxy Group of Seven Natural Gas Distribution Companies (excl. PRPM)
1.	Discounted Cash Flow Model (DCF) (1)	10.29%	10.29%
2.	Risk Premium Model (RPM) (2)	10.86%	10.81%
3.	Capital Asset Pricing Model (CAPM) (3)	11.12%	11.11%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	11.92%	11.91%
5.	Indicated Common Equity Cost Rate before Adjustment for Unique Risk	10.29% - 11.92%	10.29% - 11.91%
6.	Size Risk Adjustment (5)	0.15%	0.15%
7.	Credit Risk Adjustment (6)	0.00%	0.00%
8.	Flotation Cost Adjustment (7)	0.15%	0.15%
9.	Indicated Common Equity Cost Rate after Adjustment	10.59% - 12.22%	10.59% - 12.21%
10.	Recommended Common Equity Cost Rate	10.95%	10.95%

- Notes:
- (1) From page 1 of Exhibit DWD-3.
  - (2) From page 1 of Exhibit DWD-4.
  - (3) From page 1 of Exhibit DWD-5.
  - (4) From page 1 of Exhibit DWD-7.
  - (5) Size risk adjustment is required to account for the company's smaller size relative to the Utility Proxy Group.  
Company-specific risk adjustment to reflect Louisville Gas & Electric Company's lower risk due to a lower long-term issuer rating of A3 relative to the Natural Gas Utility Proxy Group.
  - (6) From page 1 of Exhibit DWD-10.
  - (7) From page 1 of Exhibit DWD-10.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Brief Summary of Common Equity Cost Rate

Line No.	Principal Methods	Kentucky Utilities Company		Louisville Gas & Electric Company - Electric	
		Proxy Group of Fifteen Electric Companies	Proxy Group of Fifteen Electric Companies (excl. PRPM)	Proxy Group of Fifteen Electric Companies	Proxy Group of Fifteen Electric Companies (excl. PRPM)
1.	Discounted Cash Flow Model (DCF) (1)	10.32%	10.32%	10.32%	10.32%
2.	Risk Premium Model (RPM) (2)	10.79%	10.74%	10.79%	10.74%
3.	Capital Asset Pricing Model (CAPM) (3)	10.75%	10.75%	10.75%	10.75%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	11.84%	11.83%	11.84%	11.83%
5.	Indicated Common Equity Cost Rate before Adjustment for Unique Risk	10.32% - 11.84%	10.32% - 11.83%	10.32% - 11.84%	10.32% - 11.83%
6.	Size Risk Adjustment (5)	0.05%	0.05%	0.10%	0.10%
7.	Credit Risk Adjustment (6)	-0.07%	-0.07%	-0.07%	-0.07%
8.	Flotation Cost Adjustment (7)	0.15%	0.15%	0.15%	0.15%
9.	Indicated Common Equity Cost Rate after Adjustment	10.46% - 11.98%	10.46% - 11.97%	10.51% - 12.03%	10.51% - 12.02%
10.	Recommended Common Equity Cost Rate	10.95%	10.95%	10.95%	10.95%

- Notes:
- (1) From page 1 of Exhibit DWD-3.
  - (2) From page 1 of Exhibit DWD-4.
  - (3) From page 1 of Exhibit DWD-5.
  - (4) From page 1 of Exhibit DWD-7.
  - (5) Size risk adjustment is required to account for the company's smaller size relative to the Utility Proxy Group.
  - (6) Company-specific risk adjustment to reflect Louisville Gas & Electric Company's and Kentucky Utilities' lower risk due to a lower long-term issuer rating of A3 relative to the Electric Utility Proxy Group.
  - (7) From page 1 of Exhibit DWD-10.

Proxy Group of Seven Natural Gas Distribution Companies  
Capitalization and Financial Statistics (1)  
2019 - 2023, Inclusive

	2023	2022	2021	2020	2019	
	(MILLIONS OF DOLLARS)					
<u>Capitalization Statistics</u>						
<u>Amount of Capital Employed</u>						
Total Permanent Capital	\$9,183.685	\$8,210.117	\$7,442.590	\$6,654.657	\$5,863.473	
Short-Term Debt	\$745.215	\$823.046	\$628.829	\$300.871	\$554.766	
Total Capital Employed	\$9,928.900	\$9,033.163	\$8,071.419	\$6,955.528	\$6,418.239	
<u>Indicated Average Capital Cost Rates (2)</u>						
Total Debt	4.10 %	3.17 %	2.90 %	3.39 %	3.74 %	
Preferred Stock	5.22 %	4.84 %	5.33 %	6.19 %	4.60 %	
<u>Capital Structure Ratios</u>						
Based on Total Permanent Capital:						5 YEAR AVERAGE
Long-Term Debt	52.23 %	51.17 %	51.57 %	50.16 %	46.87 %	50.40 %
Preferred Stock	0.86	1.84	1.98	1.53	1.65	1.57
Common Equity	46.90	46.99	46.45	48.31	51.48	48.03
Total	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %
<u>Based on Total Capital:</u>						
Total Debt, Including Short-Term Debt	54.91 %	55.90 %	56.25 %	53.27 %	51.14 %	54.29 %
Preferred Stock	0.75	1.64	1.87	1.42	1.44	1.42
Common Equity	44.34	42.46	41.89	45.30	47.41	44.28
Total	100.00 %	100.00 %	100.00 %	100.00 %	100.00 %	99.99 %
<u>Financial Statistics</u>						
<u>Financial Ratios - Market Based</u>						
Earnings / Price Ratio	5.42 %	4.18 %	5.24 %	3.85 %	3.97 %	4.53 %
Market / Average Book Ratio	156.78	180.83	170.62	184.68	219.63	182.51
Dividend Yield	3.79	3.29	3.46	3.14	2.60	3.26
Dividend Payout Ratio	70.31	58.56	61.19	78.10	67.01	67.03
<u>Rate of Return on Average Book Common Equity</u>	8.63 %	8.06 %	9.49 %	7.11 %	8.74 %	8.41 %
<u>Total Debt / EBITDA (3)</u>	5.18 x	5.39 x	5.59 x	5.72 x	4.81 x	5.34 x
<u>Funds from Operations / Total Debt (4)</u>	27.32 %	11.51 %	9.24 %	14.20 %	15.23 %	15.50 %
<u>Total Debt / Total Capital</u>	54.91 %	55.90 %	56.25 %	53.27 %	51.14 %	54.29 %

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.

Proxy Group of Fifteen Electric Companies  
Capitalization and Financial Statistics (1)  
2019 - 2023, Inclusive

	2023	2022	2021	2020	2019	
	(MILLIONS OF DOLLARS)					
<u>Capitalization Statistics</u>						
<u>Amount of Capital Employed</u>						
Total Permanent Capital	\$35,135.635	\$33,005.151	\$30,958.714	\$28,756.784	\$26,766.057	
Short-Term Debt	\$1,060.785	\$1,196.389	\$998.605	\$820.719	\$880.673	
Total Capital Employed	<u>\$36,196.420</u>	<u>\$34,201.540</u>	<u>\$31,957.319</u>	<u>\$29,577.503</u>	<u>\$27,646.730</u>	
<u>Indicated Average Capital Cost Rates (2)</u>						
Total Debt	4.33 %	3.78 %	3.65 %	4.09 %	4.13 %	
Preferred Stock	5.13 %	5.86 %	7.09 %	5.58 %	5.34 %	
<u>Capital Structure Ratios</u>						
Based on Total Permanent Capital:						5 YEAR AVERAGE
Long-Term Debt	58.19 %	57.43 %	56.89 %	55.65 %	54.09 %	56.45 %
Preferred Stock	0.54	0.49	0.54	0.71	0.83	0.62
Common Equity	<u>41.28</u>	<u>42.08</u>	<u>42.57</u>	<u>43.64</u>	<u>45.08</u>	<u>42.93</u>
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>Based on Total Capital:</u>						
Total Debt, Including Short-Term Debt	59.31 %	58.56 %	58.04 %	56.67 %	55.17 %	57.55 %
Preferred Stock	0.52	0.47	0.52	0.68	0.81	0.60
Common Equity	<u>40.17</u>	<u>40.97</u>	<u>41.45</u>	<u>42.66</u>	<u>44.02</u>	<u>41.85</u>
Total	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Financial Statistics</u>						
<u>Financial Ratios - Market Based</u>						
Earnings / Price Ratio	5.41 %	4.95 %	5.43 %	4.30 %	5.31 %	5.08 %
Market / Average Book Ratio	177.32	194.85	194.85	184.99	193.03	189.01
Dividend Yield	3.93	3.79	3.77	3.68	3.40	3.71
Dividend Payout Ratio	79.39	79.13	69.93	64.92	66.11	71.89
<u>Rate of Return on Average Book Common Equity</u>	9.19 %	9.21 %	10.12 %	8.03 %	9.91 %	9.29 %
<u>Total Debt / EBITDA (3)</u>	5.53 x	5.51 x	5.31 x	5.98 x	4.73 x	5.41 x
<u>Funds from Operations / Total Debt (4)</u>	12.87 %	10.48 %	6.06 %	12.20 %	13.34 %	10.99 %
<u>Total Debt / Total Capital</u>	59.31 %	58.56 %	58.04 %	56.67 %	55.17 %	57.55 %

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 Seven Natural Gas Distribution Companies  
2019 - 2023, Inclusive

	<u>2023</u>	<u>2022</u>	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>5 YEAR AVERAGE</u>
<u>Atmos Energy Corporation</u>						
Long-Term Debt	37.62 %	37.96 %	39.35 %	40.02 %	38.03 %	38.60 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>62.38</u>	<u>62.04</u>	<u>60.65</u>	<u>59.98</u>	<u>61.97</u>	<u>61.40</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>New Jersey Resources Corporation</u>						
Long-Term Debt	59.16 %	58.49 %	57.81 %	55.35 %	50.11 %	56.18 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>40.84</u>	<u>41.51</u>	<u>42.19</u>	<u>44.65</u>	<u>49.89</u>	<u>43.82</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>NiSource Inc.</u>						
Long-Term Debt	57.26 %	55.77 %	57.09 %	61.64 %	56.79 %	57.71 %
Preferred Stock	2.51	9.03	9.55	5.87	6.35	6.66
Common Equity	<u>40.23</u>	<u>35.20</u>	<u>33.36</u>	<u>32.49</u>	<u>36.86</u>	<u>35.63</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>Northwest Natural Holding Company</u>						
Long-Term Debt	55.11 %	53.21 %	52.12 %	51.81 %	50.43 %	52.54 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>44.89</u>	<u>46.79</u>	<u>47.88</u>	<u>48.19</u>	<u>49.57</u>	<u>47.46</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>ONE Gas, Inc.</u>						
Long-Term Debt	44.05 %	42.10 %	41.74 %	41.76 %	37.65 %	41.46 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>55.95</u>	<u>57.90</u>	<u>58.26</u>	<u>58.24</u>	<u>62.35</u>	<u>58.54</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>Southwest Gas Holding Company</u>						
Long-Term Debt	58.43 %	59.25 %	59.90 %	50.90 %	49.58 %	55.61 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	<u>41.57</u>	<u>40.75</u>	<u>40.10</u>	<u>49.10</u>	<u>50.42</u>	<u>44.39</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>Spire Inc.</u>						
Long-Term Debt	54.01 %	51.42 %	52.98 %	49.62 %	45.49 %	50.70 %
Preferred Stock	3.52	3.84	4.28	4.83	5.19	4.33
Common Equity	<u>42.46</u>	<u>44.74</u>	<u>42.74</u>	<u>45.55</u>	<u>49.32</u>	<u>44.96</u>
Total Capital	<u>99.99 %</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 Seven Natural Gas Distribution Companies</u>						
Long-Term Debt	52.23 %	51.17 %	51.57 %	50.16 %	46.87 %	50.40 %
Preferred Stock	0.86	1.84	1.98	1.53	1.65	1.57
Common Equity	<u>46.90</u>	<u>46.99</u>	<u>46.45</u>	<u>48.31</u>	<u>51.48</u>	<u>48.03</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>

Source of Information  
Annual Forms 10-K

Kentucky Utilities Company / Louisville Gas & Electric Company  
Operating Subsidiary Company Capital Structures of the  
Proxy Group of Seven Natural Gas Distribution Companies

Company Name	Parent Company Ticker	2023		
		Common Equity	Total Debt	Total Capital
Atmos Energy Corporation	ATO	60.41%	39.59%	100.00%
New Jersey Natural Gas Company	NJR	37.70%	62.30%	100.00%
Northern Indiana Public Service Company	NI	59.26%	40.74%	100.00%
Northwest Natural Gas Company	NWN	45.77%	54.23%	100.00%
ONE Gas, Inc.	OGS	47.40%	52.60%	100.00%
Southwest Gas Corporation	SWX	47.62%	52.38%	100.00%
Spire Alabama Inc.	SR	50.89%	49.11%	100.00%
Spire Missouri Inc.	SR	44.21%	55.79%	100.00%
	Average	<u>49.16%</u>	<u>50.84%</u>	
	Maximum	<u>60.41%</u>	<u>62.30%</u>	
	Minimum	<u>37.70%</u>	<u>39.59%</u>	

Source: S&P Global Market Intelligence.

Company Financial Statements.

Northern Indiana Public Service Company is from FERC financial Report Form Form No. 1.



Capital Structure Based upon Total Permanent Capital for the  
Proxy Group of Fifteen Electric Companies  
2019 - 2023, Inclusive

	<u>2023</u>	<u>2022</u>	<u>2021</u>	<u>2020</u>	<u>2019</u>	<u>5 YEAR AVERAGE</u>
<u>North Western Corporation</u>						
Long-Term Debt	49.99 %	49.56 %	52.09 %	52.72 %	52.27 %	51.33 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	50.01	50.44	47.91	47.28	47.73	48.67
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	49.03 %	50.75 %	52.57 %	49.04 %	43.56 %	48.99 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	50.97	49.25	47.43	50.96	56.44	51.01
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Pinnacle West Capital Corporation</u>						
Long-Term Debt	57.67 %	56.30 %	54.46 %	52.85 %	50.91 %	54.44 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	42.33	43.70	45.54	47.15	49.09	45.56
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	54.56 %	56.75 %	54.82 %	53.83 %	50.06 %	54.00 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	45.44	43.25	45.18	46.17	49.94	46.00
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	65.50 %	64.37 %	64.99 %	63.22 %	61.71 %	63.96 %
Preferred Stock	0.00	0.00	0.36	0.38	0.40	0.23
Common Equity	34.50	35.63	34.65	36.40	37.90	35.82
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>TXNM Energy, Inc.</u>						
Long-Term Debt	65.72 %	64.92 %	62.93 %	61.52 %	64.02 %	63.82 %
Preferred Stock	0.17	0.18	0.20	0.22	0.25	0.20
Common Equity	34.11	34.90	36.88	38.26	35.73	35.98
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	59.11 %	58.97 %	58.91 %	57.93 %	57.77 %	58.54 %
Preferred Stock	0.00	0.00	0.00	0.00	0.00	0.00
Common Equity	40.89	41.03	41.09	42.07	42.23	41.46
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>Proxy Group of Fifteen Electric Companies</u>						
Long-Term Debt	58.19 %	57.43 %	56.89 %	55.65 %	54.09 %	56.45 %
Preferred Stock	0.54	0.49	0.54	0.71	0.83	0.62
Common Equity	41.28	42.08	42.57	43.64	45.08	42.93
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

Kentucky Utilities Company / Louisville Gas & Electric Company  
Operating Subsidiary Company Capital Structures of the  
Proxy Group of Fifteen Electric Companies

Company Name	Parent Company Ticker	2024			
		Common Equity	Preferred Equity	Long- Term Debt	Total Capital
Union Electric Company (NYSE:UEP)	AEE	50.08%	0.51%	49.42%	100.00%
Ameren Illinois Company	AEE	55.37%	0.37%	44.26%	100.00%
Appalachian Power Company	AEP	50.00%	0.00%	50.00%	100.00%
AEP Texas Inc. (NYSE:CSR)	AEP	42.82%	0.00%	57.18%	100.00%
Southwestern Electric Power Company	AEP	48.51%	0.00%	51.49%	100.00%
Ohio Power Company	AEP	50.61%	0.00%	49.39%	100.00%
Indiana Michigan Power Company	AEP	48.76%	0.00%	51.24%	100.00%
Public Service Company of Oklahoma	AEP	47.40%	0.00%	52.60%	100.00%
Kentucky Power Company	AEP	44.95%	0.00%	55.05%	100.00%
Progress Energy, Inc. (NYSE:PGN)	DUK	49.76%	0.00%	50.24%	100.00%
Duke Energy Carolinas, LLC	DUK	50.34%	0.00%	49.66%	100.00%
Duke Energy Progress, LLC	DUK	48.17%	0.00%	51.83%	100.00%
Duke Energy Florida, LLC	DUK	50.82%	0.00%	49.18%	100.00%
Duke Energy Indiana, LLC (OTCPK:PSIE)	DUK	53.32%	0.00%	46.68%	100.00%
Duke Energy Ohio, Inc. (NYSE:CIN)	DUK	56.68%	0.00%	43.32%	100.00%
Piedmont Natural Gas Company, Inc. (NYSE:PNY)	DUK	52.04%	0.00%	47.96%	100.00%
Southern California Edison Company	EIX	36.55%	4.15%	59.30%	100.00%
Entergy Louisiana, LLC	ETR	53.71%	0.00%	46.29%	100.00%
Entergy Texas, Inc.	ETR	47.64%	0.56%	51.80%	100.00%
Entergy Mississippi, LLC	ETR	49.16%	0.00%	50.84%	100.00%
Eversys Kansas Central, Inc.	EVRG	52.92%	0.00%	47.08%	100.00%
Eversys Metro, Inc. (NYSE:KLT)	EVRG	50.75%	0.00%	49.25%	100.00%
Idaho Power Company (NYSE:IDA)	IDA	50.14%	0.00%	49.86%	100.00%
Interstate Power and Light Company (NYSE:IPW)	LNT	51.78%	0.00%	48.22%	100.00%
Wisconsin Power and Light Company	LNT	53.30%	0.00%	46.70%	100.00%
NorthWestern Energy Group, Inc. (NASDAQGS:NWE)	NWE	48.78%	0.00%	51.22%	100.00%
Oklahoma Gas and Electric Company	OGE	53.23%	0.00%	46.77%	100.00%
OGE Energy Corp. (NYSE:OGE)	OGE	47.71%	0.00%	52.29%	100.00%
Arizona Public Service Company	PNW	47.59%	0.00%	52.41%	100.00%
Portland General Electric Company (NYSE:POR)	POR	42.47%	0.00%	57.53%	100.00%
Georgia Power Company	SO	54.62%	0.00%	45.38%	100.00%
Alabama Power Company	SO	53.79%	0.00%	46.21%	100.00%
Southern Company Gas (NYSE:GAS)	SO	56.19%	0.00%	43.81%	100.00%
Southern Power Company	SO	49.97%	0.00%	50.03%	100.00%
Mississippi Power Company	SO	55.12%	0.00%	44.88%	100.00%
Southern Natural Gas Company, L.L.C.	SO	66.40%	0.00%	33.60%	100.00%
Texas-New Mexico Power Company	TXNM	48.05%	0.00%	51.95%	100.00%
Public Service Company of Colorado (NYSE:PSR)	XEL	54.30%	0.00%	45.70%	100.00%
Northern States Power Company	XEL	52.36%	0.00%	47.64%	100.00%
Southwestern Public Service Company (NYSE:SPS)	XEL	51.94%	0.00%	48.06%	100.00%
Northern States Power Company	XEL	53.49%	0.00%	46.51%	100.00%
Average		<u>50.77%</u>	<u>0.14%</u>	<u>49.09%</u>	
Minimum		<u>36.55%</u>	<u>0.00%</u>	<u>33.60%</u>	
Maximum		<u>66.40%</u>	<u>4.15%</u>	<u>59.30%</u>	

Source: S&P Capital IQ.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Seven Natural Gas Distribution Companies	Average Dividend Yield (1)	Value Line Projected Five Year Growth in EPS (2)	Zack's Five Year Projected Growth Rate in EPS	S&P Capital IQ Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (3)	Adjusted Dividend Yield (4)	Indicated Common Equity Cost Rate (5)
Atmos Energy Corporation	2.44 %	6.00 %	7.10 %	7.44 %	6.85 %	2.52 %	9.37 %
New Jersey Resources Corporation	3.82	5.00	NA	5.90	5.45	3.92	9.37
NiSource Inc.	2.98	9.50	8.20	7.93	8.54	3.11	11.65
Northwest Natural Holding Company	4.84	6.50	NA	5.50	6.00	4.99	10.99
ONE Gas, Inc.	3.77	4.00	4.70	2.63	3.78	3.84	7.62
Southwest Gas Holding Company	3.37	10.00	6.60	10.55	9.05	3.52	12.57
Spire Inc.	4.47	4.50	5.80	6.82	5.71	4.60	10.31
						Average	10.27 %
						Median	10.31 %
						Average of Mean and Median	10.29 %

NA= Not Available

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Fifteen Electric Companies	Average Dividend Yield (1)	Value Line Projected Five Year Growth in EPS (2)	Zack's Five Year Projected Growth Rate in EPS	S&P Capital IQ Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (3)	Adjusted Dividend Yield (4)	Indicated Common Equity Cost Rate (5)
Alliant Energy Corporation	3.38 %	6.00 %	6.40 %	6.73 %	6.38 %	3.49 %	9.87 %
Ameren Corporation	3.05	6.50	6.70	6.79	6.66	3.15	9.81
American Electric Power Corporation	3.82	6.50	6.00	6.59	6.36	3.94	10.30
Duke Energy Corporation	3.77	6.00	6.30	6.33	6.21	3.89	10.10
Edison International	5.01	6.50	8.50	8.25	7.75	5.20	12.95
Entergy Corporation	3.03	0.50	9.50	8.40	6.13	3.12	9.25
Eversource Energy, Inc.	4.19	7.50	5.90	5.68	6.36	4.32	10.68
IDACORP, Inc.	3.09	6.00	8.40	7.00	7.13	3.20	10.33
North Western Corporation	4.95	4.50	6.10	5.73	5.44	5.08	10.52
OGE Energy Corporation	3.97	6.50	6.10	6.09	6.23	4.09	10.32
Pinnacle West Capital Corporation	4.09	4.00	5.60	6.38	5.33	4.20	9.53
Portland General Electric Company	4.64	5.50	12.30	7.83	8.54	4.84	13.38 (6)
Southern Company	3.41	6.50	6.80	6.62	6.64	3.52	10.16
TXNM Energy, Inc.	3.33	4.00	3.00	5.68	4.23	3.40	7.63 (6)
Xcel Energy Inc.	3.36	6.50	6.90	7.35	6.92	3.48	10.40
						Average	10.33 %
						Median	10.30 %
						Average of Mean and Median	10.32 %

## Notes:

- (1) Indicated dividend at 02/28/2025 divided by the average closing price of the last 60 trading days ending 02/28/2025 for each company.
- (2) From pages 2 through 23 of this Exhibit.
- (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 Atmos Energy Corporation,  $2.44\% \times (1 + (1/2 \times 6.85\%)) = 2.52\%$ .
- (5) Column 6 + Column 7.
- (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 02/28/2025  
S&P Capital IQ

<p>(A) Fiscal year ends Sept. 30th. (B) Diluted shares. Excl. nonrec. gains (loss): '10, 5c; '11, '1c; '18, \$1.43; '20, 17c. Excludes discontinued operations: '11, 10c; '12, 27c; '13, 14c.</p> <p>© 2025 Value Line, Inc. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for operation or marketing, advertising, or electronic publication, service or product.</p>		<p>'17, 13c. Next earnings report due early May. (C) Dividends historically paid in early March, June, Sept., and Dec. ■ Div. reinvestment plan. Direct stock purchase plan available.</p>	<p>(D) In millions. (E) Qtrs may not add due to change in shrs outstanding.</p>	<table><tr><td>Company's Financial Strength</td><td>A</td></tr><tr><td>Stock's Price Stability</td><td>95</td></tr><tr><td>Price Growth Persistence</td><td>60</td></tr><tr><td>Earnings Predictability</td><td>100</td></tr></table>	Company's Financial Strength	A	Stock's Price Stability	95	Price Growth Persistence	60	Earnings Predictability	100
Company's Financial Strength	A											
Stock's Price Stability	95											
Price Growth Persistence	60											
Earnings Predictability	100											
<p>To subscribe call 1-800-VALUELINE</p>												

<p>(A) Fiscal year ends Sept. 30th. (B) Diluted earnings. Qtrly. revenues and eggs. may not sum to total due to rounding and change in shares outstanding. Next earnings</p>	<p>report due early May. (C) Dividends historically paid in early Jan., April, July, and October. ■ Dividend reinvestment plan available.</p>	<p>(D) Includes regulatory assets in 2024: \$612.6 million, \$6.16/share. (E) In millions, adjusted for 3/15 split.</p>	<p><b>Company's Financial Strength</b> A <b>Stock's Price Stability</b> 85 <b>Price Growth Persistence</b> 40 <b>Earnings Predictability</b> 65</p>
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<b>(A)</b> Dil. EPS. Excl. gains (losses) on disc. ops.: '08, (\$1.14); '15, (30c); '18, (\$1.48). Next egs. report due early May. '19's egs. may not sum to total due to rounding.	<b>(B)</b> Div'ds historically paid in mid-Feb., May, Aug., Nov. ■ Div'd reinv. avail.	<b>(D)</b> In mill. <b>(E)</b> Spun off Columbia Pipeline Group (7/15)	<table><tr><td><b>Company's Financial Strength</b></td><td><b>A</b></td></tr><tr><td><b>Stock's Price Stability</b></td><td><b>95</b></td></tr><tr><td><b>Price Growth Persistence</b></td><td><b>25</b></td></tr><tr><td><b>Earnings Predictability</b></td><td><b>70</b></td></tr></table>	<b>Company's Financial Strength</b>	<b>A</b>	<b>Stock's Price Stability</b>	<b>95</b>	<b>Price Growth Persistence</b>	<b>25</b>	<b>Earnings Predictability</b>	<b>70</b>
<b>Company's Financial Strength</b>	<b>A</b>										
<b>Stock's Price Stability</b>	<b>95</b>										
<b>Price Growth Persistence</b>	<b>25</b>										
<b>Earnings Predictability</b>	<b>70</b>										
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ONE GAS, INC. NYSE-OGS				RECENT PRICE	70.20	P/E RATIO	16.9	(Trailing: 18.3 Median: 21.0)	RELATIVE P/E RATIO	0.92	DIV'D YLD	3.8%	VALUE LINE					
TIMELINESS	4	Lowered 11/22/24	High: 44.3 51.8 67.4 79.5 87.8 96.7 97.0 81.9 92.3 84.3 78.9 73.9	Low: 31.9 38.9 48.0 61.4 62.2 75.8 63.7 62.5 68.9 55.5 57.7 66.4														
SAFETY	2	New 6/2/17	LEGENDS 35.00 x Dividends p.sh ... Relative Price Strength Options: Yes Shaded area indicates recession															
TECHNICAL	3	Lowered 2/21/25																
BETA	.85	(1.00 = Market)																
18-Month Target Price Range																		
Low-High Midpoint (% to Mid)																		
\$44-\$83 \$64 (-10%)																		
2028-30 PROJECTIONS																		
Price Gain Ann'l Total																		
High Low 110 80 (+55%) 15%																		
Low 80 (+15%) 7%																		
Institutional Decisions																		
1Q2024 2Q2024 3Q2024																		
to Buy 170 143 152																		
to Sell 147 160 146																		
Hld's(000) 51905 53066 62020																		
Percent shares traded 21 14 7																		
The shares of ONE Gas, Inc. began trading "regular-way" on the New York Stock Exchange on February 3, 2014. That happened as a result of the separation of ONEOK's natural gas distribution operation. Regarding the details of the spinoff, on January 31, 2014, ONEOK distributed one share of OGS common stock for every four shares of ONEOK common stock held by ONEOK shareholders of record as of the close of business on January 21. It should be mentioned that ONEOK did not retain any ownership interest in the new company.																		
CAPITAL STRUCTURE as of 9/30/24																		
Total Debt \$3365.3 mill. Due in 5 Yrs \$890.0 mill.																		
LT Debt \$2384.9 mill. LT Interest \$120.0 mill.																		
(LT interest earned: 3.4x; total interest coverage: 3.4x)																		
Leases, Uncapitalized Annual rentals \$6.7 mill.																		
Pfd Stock None																		
Pension Assets-12/23 \$977.0 mill.																		
Obliq. \$962.1 mill.																		
Common Stock 56,655,256 shs.																		
as of 10/28/24																		
MARKET CAP: \$4.0 billion (Mid Cap)																		
CURRENT POSITION																		
2022 2023 9/30/24																		
(SMILL.)																		
Cash Assets 9.7 18.8 18.8																		
Other 1207.9 746.4 671.7																		
Current Assets 1217.6 765.2 690.5																		
Accts Payable 360.5 278.1 146.8																		
Debt Due 572.7 888.9 980.4																		
Other 256.2 310.2 260.4																		
Current Liab. 1189.4 1477.2 1387.6																		
Fix. Chg. Cov. 540% 390% 405%																		
ANNUAL RATES																		
Past 10 Yrs. Past 5 Yrs. Est'd '21-'23																		
of change (per sh)																		
Revenues -- 7.0% 7.5%																		
"Cash Flow" -- 7.0% 9.5%																		
Earnings -- 6.0% 4.0%																		
Dividends -- 8.5% 2.5%																		
Book Value -- 4.5% 6.0%																		
Cal-endar																		
QUARTERLY REVENUES (\$ mill.)																		
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																		
2022 971.5 428.9 359.4 818.2 2578.0																		
2023 1032.1 398.1 335.8 606.0 2372.0																		
2024 758.3 354.1 340.4 617.2 2070																		
2025 800 375 350 675 2200																		
2026 825 400 380 725 2330																		
Cal-endar																		
EARNINGS PER SHARE ^																		
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																		
2022 1.83 .59 .44 1.23 4.08																		
2023 1.84 .58 .45 1.27 4.14																		
2024 1.75 .48 .34 1.28 3.85																		
2025 1.85 .58 .44 1.38 4.25																		
2026 1.94 .63 .48 1.45 4.50																		
Cal-endar																		
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ALLIANT ENERGY				NDQ-LNT		RECENT PRICE		63.63		P/E RATIO		19.9 (Trailing: 22.6 Median: 21.0)		RELATIVE P/E RATIO		1.04		DIV'D YLD		3.0%		VALUE LINE																			
TIMELINESS 3				Raised 5/3/24		High: 27.1		34.9		35.4		41.0		45.6		46.6		55.4		60.3		62.3		65.4		56.3		64.2				Target Price Range		2027		2028		2029			
SAFETY 1				Raised 9/6/24		Low: 21.9		25.0		27.1		30.4		36.6		36.8		40.8		37.7		46.0		47.2		45.2		46.8													
TECHNICAL 3				Lowered 11/29/24		LEGENDS 28.00 x Dividends p sh divided by Interest Rate ..... Relative Price Strength 2-for-1 split 5/16 Options: Yes Shaded area indicates recession																																			
BETA .90				(1.00 = Market)																																					
18-Month Target Price Range																																									
Low-High				Midpoint (% to Mid)																																					
\$46-\$73				\$60 (-5%)																																					
2027-29 PROJECTIONS																																									
Price				Gain		Ann'l Total																																			
75				(+20%)		Return																																			
65				(Nil)		7%																																			
4%																																									
Institutional Decisions																																									
4Q2023				1Q2024		2Q2024																																			
to Buy				312		290		314																																	
to Sell				279		311		265																																	
Hld's(000)				209105		208018		205430																																	
				Percent		24																																			
				shares		16																																			
				traded		8																																			
2008				2009		2010		2011		2012		2013		2014		2015		2016		2017		2018		2019		2020		2021		2022		2023		2024		2025		© VALUE LINE PUB. LLC		27-29	
16.67				15.51		15.40		16.51		13.94		14.77		15.10		14.34		14.58		14.62		14.97		14.89		13.67		14.65		16.74		15.72		16.15		17.30		Revenues per sh		18.35	
2.28				2.10		2.60		2.75		2.95		3.34		3.49		3.45		3.43		3.97		4.32		4.59		4.92		5.25		5.40		5.38		5.55		5.85		"Cash Flow" per sh		6.50	
1.27				.95		1.38		1.38		1.53		1.65		1.74		1.69		1.65		1.99		2.19		2.33		2.47		2.63		2.73		2.78		2.95		3.25		Earnings per sh <sup>A</sup>		3.90	
.70				.75		.79		.85		.90		.94		1.02		1.10		1.18		1.26		1.34		1.42		1.52		1.61		1.71		1.81		1.92		2.04		Div'd Decl'd per sh <sup>B</sup> + <sup>†</sup>		2.43	
3.98				5.43		3.91		3.03		5.22		3.32		3.78		4.25		5.26		6.34		6.92		6.69		5.47		4.67		5.91		7.24		5.80		5.60		Cap'l Spending per sh		5.40	
12.78				12.54		13.05		13.57		14.12		14.79		15.54		16.41		16.96		18.08		19.43		21.24		22.76		23.91		24.99		26.46		27.65		28.85		Book Value per sh <sup>C</sup>		31.90	
220.90				221.31		221.79		222.04		221.97		221.89		221.87		226.92		227.67		231.35		236.06		245.02		249.87		250.47		251.14		256.10		256.70		256.70		Common Shs Outst'g <sup>D</sup>		257.00	
13.4				13.9		12.5		14.5		14.5		15.3		16.6		18.1		22.3		20.6		19.1		21.2		21.2		21.4		21.4		18.8						Avg Ann'l P/E Ratio		18.0	
.81				.93		.80		.91		.92		.86		.87		.91		1.17		1.04		1.03		1.13		1.09		1.15		1.24		1.05						Relative P/E Ratio		1.00	
4.1%				5.7%		4.6%		4.3%		4.1%		3.7%		3.5%		3.6%		3.2%		3.1%		3.2%		2.9%		2.9%		2.9%		2.9%		3.5%						Avg Ann'l Div'd Yield		3.7%	
CAPITAL STRUCTURE as of 9/30/24																																									
Total Debt \$10679 mill.				Due in 5 Yrs \$2984 mill.																																					
LT Debt \$9245 mill.				LT Interest \$370 mill.																																					
(LT interest earned: 2.8x)																																									
Leases, Uncapitalized Annual rentals \$3 mill.																																									
Pension Assets-12/23 \$732 mill.																																									
Pfd Stock None																																									
Common Stock 256,599,202 shs.																																									
MARKET CAP: \$16.3 billion (Large Cap)																																									
ELECTRIC OPERATING STATISTICS																																									
2021				2022		2023																																			
+3.7				-7																																					
11696				11494		11435																																			
7.64				8.39		8.47																																			
NA				NA		NA																																			
5486				5629		5856																																			
NA				NA		NA																																			
+8				+7		+7																																			
Fixed Charge Cov. (%)				259		NA		NA																																	
ANNUAL RATES				Past		Past		Est'd '21-'23																																	
of change (per sh)				10 Yrs.		5 Yrs.		to '27-'29																																	
Revenues				.5%		1.5%		2.5%																																	
"Cash Flow"				6.0%		6.5%		2.0%																																	
Earnings				6.0%		7.0%		6.0%																																	
Dividends				6.5%		6.5%		6.0%																																	
Book Value				6.0%		6.5%		4.0%																																	
BUSINESS:																																									
Alliant Energy Corporation is the parent company of																																									
Interstate Power and Light Company (IPL) and Wisconsin Power																																									
and Light Company (WPL). Together, the utility subsidiaries serve																																									
approximately one million electric and 425,000 natural gas customers																																									
in Wisconsin and Iowa. Electric revenue: residential, 36%; com-																																									
mercial, 25%; industrial, 29%; wholesale, 8%; other, 2%. Generat-																																									
thus reducing Alliant's susceptibility to																																									
swings in natural-gas prices and the like.																																									
Its investments in "green" power also yield																																									
significant tax credits that can be sold to																																									
regional manufacturers and other third																																									
parties looking to maintain compliance																																									
with restrictions on harmful carbon emis-																																									
sions. In 2025 alone, Alliant could realize																																									

AMEREN NYSE-AEE				RECENT PRICE	82.57	P/E RATIO	17.1 (Trailing: 18.7; Median: 20.0)	RELATIVE P/E RATIO	0.93	DIV'D YLD	3.2%	VALUE LINE									
TIMELINESS	4	Lowered 12/29/23	High: 37.3	30.6	48.1	46.8	54.1	64.9	70.9	80.9	87.7	90.8	99.2	91.2	84.4		Target Price Range	2027	2028	2029	
SAFETY	1	Raised 9/10/21	Low: 30.6	35.2	37.3	41.5	51.4	63.1	63.1	63.1	58.7	69.8	73.3	69.7	67.0						
TECHNICAL	5	Lowered 8/2/24	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)																					
\$61-\$95 \$78 (-5%)																					
2027-29 PROJECTIONS																					
High	Price	Gain	Ann'l Total																		
Low	130	(+55%)	14%																		
	110	(+35%)	9%																		
Institutional Decisions																					
302023 402023 102024																					
to Buy 280 283 274																					
to Sell 314 321 321																					
Hld's(000) 210352 215268 218776																					

<p>(A) Diluted EPS. Excl. nonrec. gains (losses): '08, 40c; '10, (7c); '11, 89c; '12, (38c); '13, (14c); '16, (22, 58c); '17, 26c; '19, 20c; gains (loss) from disc. ops.: '08, 3c; '15, 58c; '16,</p>	<p>(1c); '22, (58c); '23, (34c). Next earnings report due late February. (B) Div'ds paid early Mar., June, Sept., &amp; Dec. ■ Div'd reinvestment plan avail. ↑ Shareholder invest. plan avail. (C) Incl.</p>	<p>intang. In '23: \$52.5 million (D) In mill. (E) Rev. may not sum due to rounding.</p>	<p><b>Company's Financial Strength</b> <b>Stock's Price Stability</b> <b>Price Growth Persistence</b> <b>Earnings Predictability</b></p>	<p><b>A</b> <b>95</b> <b>70</b> <b>90</b></p>
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DUKE ENERGY NYSE-DUK				RECENT PRICE 112.62				P/E RATIO 17.8 (Trailing: 19.6; Median: 18.0)				RELATIVE P/E RATIO 0.97				DIV'D YLD 3.7%				VALUE LINE			
TIMELINESS 4 Lowered 10/4/24				High: 87.3 90.0 87.8 91.8 91.4 97.4 103.8 108.4 116.3 106.4 121.3 112.8												Target Price Range 2028 2029 2030							
SAFETY 2 New 6/1/07				Low: 67.1 65.5 70.2 76.1 72.0 82.5 62.1 85.6 83.8																			
TECHNICAL 2 Lowered 1/24/25				LEGENDS ..... 27.0 x Dividends p sh ..... Relative Price Strength 1-for-3 Rev split 7/12 Options: Yes Shaded area indicates recession																			
BETA .90 (1.00 = Market)																							
18-Month Target Price Range																							
Low-High Midpoint (% to Mid)																							
\$85-\$127 \$106 (-5%)																							
2028-30 PROJECTIONS																							
Price Gain Ann'l Total																							
High 155 115 (+40%) 17%																							
Low 115 (Nil) 4%																							
Institutional Decisions																							
to Buy 102024 202024 302024																							
to Sell 893 923 984																							
Hld's(000) 503341 507258 578742																							
				Percent 15																			
				shares 10																			
				traded 5																			

<p>(A) Adjusted (non-GAAP) EPS from 2019 on. Excl. gains/(losses): nonrecursr: '10, 54c; '11, (\$3.33); '13, (\$1.12); '15, (\$1.18); '17, (\$1.37); '18, (14c); '19, (92c); '20, (\$2.54); '21, (\$2.52).</p>	<p>'22, (\$3.02); '23, (\$1.34); disc. ops.: '13, 11c; '14, 57c; '15, 11c; '18, 10c. Qlty. EPS may not sum to full yr. due to rounding. Next eps. report due mid-Feb. (B) Divs paid late Jan., Apr.,</p>	<p>July, &amp; Oct. ■ Div'd reinv. plan avail. (C) Incl. def'd chgs. In '23: \$4.36/sh. (D) In mill. (E) Rate base: net org. cost. Rate all'd on com. eq. in '20: 10.3%; Regulatory Climate: Avg.</p>	<p><b>Company's Financial Strength</b> <b>Stock's Price Stability</b> <b>Price/Promise Persistence</b> <b>Earnings Predictability</b></p>	<p><b>A</b> <b>90</b> <b>27</b> <b>15</b></p>
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<p>(A) Diluted EPS. GAAP starting in 2022. Excl. nonrec. losses: '12, \$1.26; '13, \$1.14; '14, \$1.56; '15, \$6.99; '16, \$10.14; '17, \$2.91; '18, \$1.25; '21, \$1.33. Next earnings report due early Feb.</p>	<p>ruary. (B) Div'ds historically paid in early Mar., June, Sept., &amp; Dec. '16 Div'd reinvestment plan avail. '1 Shareholder investment plan avail. (C) Incl. deferred charges. In '23: \$26.66/sh.</p>	<p>(D) In mill. (E) Rate base: Net original cost. Allowed ROE (blended): 9.71%; earned on avg. com. exp., '23: 16.0%. Regulatory Climate: Average.</p>	<p><b>Company's Financial Strength</b> <b>Stock's Price Stability</b> <b>Price Growth Persistence</b> <b>Earnings Predictability</b></p>	<p>A+ 90 45 70</p>
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EVERGY, INC. NYSE-EVRG

RECENT PRICE64.49

P/E RATIO14.9(Trailing: 18.5 Median: NMF)

RELATIVE P/E RATIO0.81

DIV'D YLD4.4%

VALUE LINE

TIMELINESS3

SAFETY2

TECHNICAL4

BETA.95(1.00 = Market)

Raised 8/23/24

New 9/14/18

Raised 8/30/24

LEGENDS

Relative Price Strength

Options: Yes

Shaded area indicates recession

18-Month Target Price Range

Low-HighMidpoint (% to Mid)

\$45-\$74\$60 (-10%)

2027-29 PROJECTIONS

PriceGainAnn'l Total Return

High95(+60%)16%

Low70(+20%)9%

Institutional Decisions

302023402023102024

to Buy320357308

to Sell273292320

Hld's(000)196134203440198283

Percent36

shares24

traded12

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27-29

Every, Inc. was formed through the merger of Great Plains Energy and Westar Energy in June of 2018. Great Plains Energy holders received .5981 of a share of Every for each of their shares, and Westar Energy holders received one share of Every for each of their shares. The merger was completed on June 4, 2018. Shares of Every began trading on the New York Stock Exchange one day later.

CAPITAL STRUCTURE as of 9/30/24

Total Debt \$11976 mill. Due in 5 Yrs \$4388 mill.

LT Debt \$11571 mill. LT Interest \$306 mill.

Incl. \$40.9 mill. finance leases.

(LT interest earned: 3.8x)

Leases, Uncapitalized Annual rentals \$18.8 mill.

Pension Assets-12/22 \$1714.7 mill.

Oblig \$2561.7 mill.

Pfd Stock None

Common Stock 229,976,171 shs.

MARKET CAP: \$13.6 billion (Large Cap)

ELECTRIC OPERATING STATISTICS

202020212022

% Change Retail Sales (KWH)

Avg. Indust. Use (MWH)

Avg. Indust. Revs. per KWH (¢)

Capacity at Peak (Mw)

Peak Load, Summer (Mw)

Annual Load Factor (%)

% Change Customers (yr-end)

Fixed Charge Cov. (%)

ANNUAL RATES

Past 10 Yrs.

Past 5 Yrs.

Est'd '20-'22

of change (per sh)

Revenues

"Cash Flow"

Earnings

Dividends

Book Value

QUARTERLY REVENUES (\$ mill.)

Cal-endar

Mar.31Jun.30Sep.30Dec.31

Full Year

2021

2022

2023

2024

2025

EARNINGS PER SHARE A

Cal-endar

Mar.31Jun.30Sep.30Dec.31

Full Year

2021

2022

2023

2024

2025

QUARTERLY DIVIDENDS PAID B

Cal-endar

Mar.31Jun.30Sep.30Dec.31

Full Year

2020

2021

2022

2023

2024

201420152016201720182019202020212022202320242025

Revenues per sh

"Cash Flow" per sh

Earnings per sh A

Div'd Decl'd per sh B

Cap'l Spending per sh

Book Value per sh C

Common Shs Outst'g D

Avg Ann'l P/E Ratio

Relative P/E Ratio

Avg Ann'l Div'd Yield

Revenues (\$mill)

Net Profit (\$mill)

Income Tax Rate

AFUDC % to Net Profit

Long-Term Debt Ratio

Common Equity Ratio

Total Capital (\$mill)

Net Plant (\$mill)

Return on Total Cap'l

Return on Shr. Equity

Return on Com Equity E

Retained to Com Eq

All Div's to Net Prof

BUSINESS:

Every, Inc. was formed through the merger of Great Plains Energy and Westar Energy in June of 2018. Through its subsidiaries (now doing business under the Every name), provides electric service to 1.6 million customers in Kansas and Missouri, including the greater Kansas City area. Electric revenue breakdown: residential, 32%; commercial, 27%; industrial, 15%; wholesale, 13%; other, 13%. Generating sources: coal, 54%; nuclear, 17%; purchased, 29%. Fuel costs: 28% of revenues. '23 reported deprec. rate: 3%. Has 4,900 employees. Chairman: Mark A. Ruelle. President & CEO: David A. Campbell. COO: Kevin E. Bryant. Inc.: Missouri. Address: 1200 Main Street, Kansas City, Missouri 64105. Tel.: 816-556-2200. Internet: www.evergy.com.

Every looks set to post significantly higher profits in 2024.

Indeed, the utility recorded better-than-expected third-quarter results. Revenues of \$1.81 billion and earnings of \$2.02 a share both surpassed our estimates and improved substantially from the year-prior period. An increased number of cooling days, along with new retail rates and transmission investments were the primary drivers of the strong showing. Management reaffirmed its 2024 bottom-line target range of \$3.73-\$3.93 per share. Our unchanged estimate sits near the middle of this range. And, the stock price has risen nicely over the past three months. Indeed, these shares are up more than 10% in value over that interim, and have jumped nearly 30% in the past year.

Our full-year 2025 earnings estimate is staying put at \$4.05 a share.

We expect slower growth compared to 2024, but our estimates are still within Everyg's long-term annual adjusted share-earnings growth target. Indeed, we look for a 5% increase from our 2024 estimate, which is right in the middle of management's updated 4%-6% yearly profit growth target.

The company will likely take advantage of elevated power demand due to data centers and AI innovations, along with regulatory and rate improvements.

The board of directors raised the quarterly dividend, effective with the December payout.

The increase was \$0.025 a share (4%). The utility's target for the payout ratio is a range of 60%-70%. The yield of 4.4% stands comfortably above the utility average, which is one of the highest dividend-paying industries in the market.

These shares are best suited for conservative, income-oriented accounts.

The aforementioned recently raised yield is Everyg's most notable feature. Long-term total return potential remains decent, on a risk-adjusted basis, in comparison to most of its peers, despite the recent stock price increase. We continue to look for the stock to trade around \$70-\$95 by 2027-2029, and think the company will earn \$4.75 a share by then, which has been raised by \$0.05 a share. Meanwhile, the stock is ranked to mirror the broader market averages in the year ahead.

Zachary J. Hodgkinson December 6, 2024

(A) Diluted earnings. Next earnings report due late Feb. (B) Dividends paid in mid-March, June, September, and December. (C) Dividend reinvestment plan available. (D) Incl. in tangibles. (E) In millions. (F) Rate base: Original cost depreciated. Rate allowed on common equity in Missouri in '18: none specified; in Kansas in '18: 9.3%: earned on average common equity, '22: 9.8%. Regulatory Climate: Company's Financial Strength

Stock's Price Stability

Price Growth Persistence

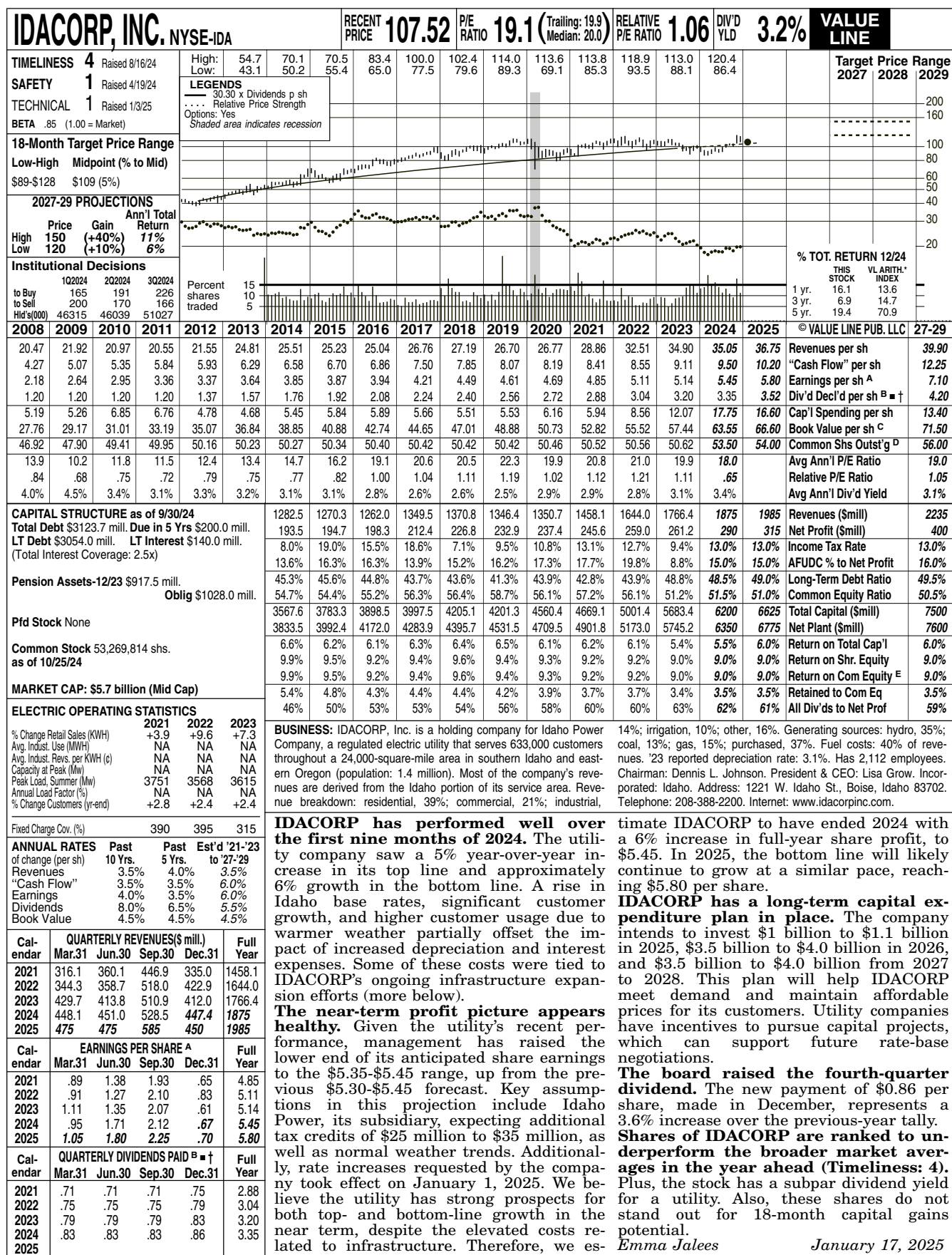
Earnings Predictability

B++

90

25

85



(A) Diluted EPS. Earnings may not sum due to rounding. Next earnings report due early February. (B) Dividends historically paid in late February, May, August, and November. (C) Divi-

dent reinvestment plan available. † Shareholder investment plan available. (C) Incl. intangibles. In '23: \$882.7 mill., \$17.44/sh. (D) In millions. (E) Rate base: Net original cost. Rate

allowed on common equity in '12: 10% (imputed); Regulatory Climate: Above Average.

**Company's Financial Strength** A  
**Stock's Price Stability** 95  
**Price Growth Persistence** 45  
**Earnings Predictability** 100

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NORTHWESTERN NDQ-NWE					RECENT PRICE	51.68	P/E RATIO	14.7	(Trailing: 14.0 Median: 17.0)	RELATIVE P/E RATIO	0.81	DIV'D YLD	5.1%	VALUE LINE					
TIMELINESS	3	Lowered 5/24/24	High: 47.2	58.7	59.7	63.8	64.5	65.7	76.7	80.5	70.8	63.1	61.2	57.5		Target Price Range			
SAFETY	2	Raised 10/18/24	Low: 35.1	42.6	48.4	52.2	55.7	50.0	57.3	45.1	53.2	48.7	46.0	46.2		2027 2028 2029			
TECHNICAL	2	Raised 12/27/24	LEGENDS ..... 23.8 x Dividends p sh ..... Relative Price Strength Options: Yes Shaded area indicates recession													128			
BETA	1.00	(1.00 = Market)														80			
18-Month Target Price Range																64			
Low-High Midpoint (% to Mid)																48			
\$41-\$63 \$52 (-5%)																40			
2027-29 PROJECTIONS																32			
High	Price	Gain	Ann'l Total													24			
Low	75	(+45%)	13%													16			
	55	(+5%)	6%													12			
Institutional Decisions																% TOT. RETURN 12/24			
to Buy 10/2024 168 20/2024 158 30/2024 160																THIS STOCK INDEX			
to Sell 128 134 139																1 yr. 12.7 13.6			
Hld's(000) 58166 58903 67655																3 yr. 9.9 14.7			
																5 yr. -4.7 70.9			
2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	© VALUE LINE PUB. LLC	27-29
35.09	31.72	30.66	30.80	28.76	29.80	25.68	25.21	26.01	26.45	23.81	24.93	23.70	25.38	24.74	23.22	24.55	25.80	Revenues per sh	28.90
4.40	4.62	4.76	5.42	5.18	5.45	5.39	5.92	6.74	6.76	6.96	7.07	6.86	6.92	6.46	6.69	7.00	7.45	"Cash Flow" per sh	8.55
1.77	2.02	2.14	2.53	2.26	2.46	2.99	2.90	3.39	3.34	3.40	3.53	3.21	3.50	3.29	3.22	3.40	3.70	Earnings per sh <sup>A</sup>	4.25
1.32	1.34	1.36	1.44	1.48	1.52	1.60	1.92	2.00	2.10	2.20	2.30	2.40	2.48	2.52	2.56	2.60	2.64	Div'd Decl'd per sh <sup>B</sup> + <sup>†</sup>	2.76
3.47	5.26	6.30	5.20	5.89	5.95	5.76	5.89	5.96	5.60	5.64	6.26	8.02	8.03	8.62	9.26	8.15	8.15	Cap'l Spending per sh	8.25
21.25	21.86	22.64	23.68	25.09	26.60	31.50	33.22	34.68	36.44	38.60	40.42	41.10	43.28	44.61	45.48	46.35	47.50	Book Value per sh <sup>C</sup>	51.85
35.93	36.00	36.23	36.28	37.22	38.75	46.91	48.17	48.33	49.37	50.32	50.45	50.59	54.06	59.74	61.25	61.50	62.00	Common Shs Outst'g <sup>D</sup>	64.00
13.9	11.5	12.9	12.6	15.7	16.9	16.2	18.4	17.2	17.8	16.8	19.9	18.6	17.4	17.3	17.0	15.2		Avg Ann'l P/E Ratio	15.5
.84	.77	.82	.79	1.00	.95	.85	.93	.90	.90	.91	1.06	.96	.94	1.00	.95	.84		Relative P/E Ratio	.85
5.4%	5.7%	4.9%	4.5%	4.2%	3.7%	3.3%	3.6%	3.4%	3.5%	3.9%	3.3%	4.0%	4.1%	4.4%	4.7%	5.0%		Avg Ann'l Div'd Yield	4.2%
CAPITAL STRUCTURE as of 9/30/24						1204.9	1214.3	1257.2	1305.7	1198.1	1257.9	1198.7	1372.3	1477.8	1422.1	1510	1600	Revenues (\$mill)	1850
Total Debt \$2974.1 mill. Due in 5 Yrs \$1011.5 mill.						120.7	138.4	164.2	162.7	171.1	179.3	162.6	181.6	185.5	194.1	210	230	Net Profit (\$mill)	270
LT Debt \$2570.7 mill. LT Interest \$115.0 mill.						--	13.7%	--	7.6%	--	1.6%	--	.9%	.9%	3.7%	6.0%	9.0%	Income Tax Rate	12.0%
Peak Load, Winter (Mw) 2000 2073 1992						8.9%	9.8%	4.3%	5.2%	3.4%	4.6%	6.0%	14.9%	18.5%	21.6%	20.5%	20.0%	AFUDC % to Net Profit	20.0%
(Total Interest Coverage: 2.6x)						53.4%	53.1%	52.0%	50.2%	52.2%	52.5%	52.8%	52.2%	48.2%	49.1%	50.0%	51.0%	Long-Term Debt Ratio	50.5%
Pension Assets-12/23 \$402.7 mill.						46.6%	46.9%	48.0%	49.8%	47.8%	47.5%	47.2%	47.8%	51.8%	50.9%	50.0%	49.0%	Common Equity Ratio	49.5%
Oblig \$477.0 mill.						3168.0	3408.6	3493.9	3614.5	4064.6	4289.8	4409.1	4893.1	5148.3	5475.4	5725	5975	Total Capital (\$mill)	6700
Pfd Stock None						3758.0	4059.5	4214.9	4358.3	4521.3	4700.9	4952.9	5247.2	5657.5	6039.8	6300	6600	Net Plant (\$mill)	7300
Common Stock 61,314,217 shs.						4.8%	5.2%	5.9%	5.6%	5.2%	5.2%	4.6%	4.6%	4.5%	4.5%	4.5%	5.0%	Return on Total Cap'l	5.0%
as of 10/25/24						8.2%	8.6%	9.8%	9.0%	8.8%	8.8%	7.8%	7.8%	7.0%	7.0%	7.5%	8.0%	Return on Shr. Equity	8.0%
MARKET CAP: \$3.4 billion (Mid Cap)						8.2%	8.6%	9.8%	9.0%	8.8%	8.8%	7.8%	7.8%	7.0%	7.0%	7.5%	8.0%	Return on Com Equity <sup>E</sup>	8.0%
ELECTRIC OPERATING STATISTICS						3.8%	3.0%	4.1%	3.4%	3.2%	3.1%	2.0%	2.3%	1.7%	1.4%	2.0%	2.5%	Retained to Com Eq	3.0%
						54%	65%	58%	62%	64%	64%	74%	71%	76%	79%	76%	71%	All Div's to Net Prof	65%
						BUSINESS: NorthWestern Energy Group, Inc. supplies electricity & gas in the Upper Midwest and Northwest, serving 467,700 electric customers in Montana and South Dakota and 307,600 gas customers in Montana, South Dakota, and Nebraska. Electric revenue breakdown for 2023: residential, 44%; commercial, 50%; industrial, 4%; and other, 2%. Generating sources: coal, 18%; hydro, 37%; wind, 4%; natural gas, 12%; purchased power, 29%. Fuel costs: 30% of revenues. 2023 reported depreciation rate: 2.8%. Had 1,573 employees as of 12/31/23. Chair of the board of directors: 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.													
						NorthWestern Energy's 2024 earnings per share were likely lower than we previously expected. While rate relief from the October 2023 general rate case (GRC) decision in Montana was a major plus last year, milder-than-typical weather crimped electricity and natural gas demand in the company's service territory. NorthWestern had also counted on receiving higher interim rates ahead of its next Montana GRC as it had in the last major state regulatory decision. Interim rate relief was delayed and as a result, management revised its share-earnings target range lower to \$3.32-\$3.47 from the initial \$3.42-\$3.62 outlook. The company is due to report year-end results after the market closes on February 14th.													
						NorthWestern is once again due for major rate relief. The public hearing for the GRC, which was filed last year, is scheduled to begin on April 22nd, with a final decision projected to conclude by year's end. It's unclear if interim rates will be forthcoming. In the utility's application to the Montana Public Service Commission, it requested a more than one percentage point hike to its authorized re-													
Cal-endar	QUARTERLY REVENUES (\$ mill.)				Full Year														
	Mar.31	Jun.30	Sep.30	Dec.31															
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	321.1	356.0	1422.1														
2024	475.3	319.9	342.3	369.6	1510														
2025	490	330	375	405	1600														
Cal-endar	EARNINGS PER SHARE <sup>A</sup>				Full Year														
	Mar.31	Jun.30	Sep.30	Dec.31															
2021	1.24	.59	.70	.97	3.50														
2022	1.08	.58	.47	1.16	3.29														
2023	1.10	.32	.48	1.32	3.22														
2024	1.08	.52	.64	1.16	3.40														
2025	1.18	.54	.69	1.29	3.70														
Cal-endar	QUARTERLY DIVIDENDS PAID <sup>B</sup> + <sup>†</sup>				Full Year														
	Mar.31	Jun.30	Sep.30	Dec.31															
2021	.62	.62	.62	.62	2.48														
2022	.63	.63	.63	.63	2.52														
2023	.64	.64	.64	.64	2.56														
2024	.65	.65	.65	.65	2.60														
2025																			

OGE ENERGY CORP. NYSE-OGE										RECENT PRICE	39.64	P/E RATIO	16.1 (Trailing: 19.4 Median: 18.0)	RELATIVE P/E RATIO	0.88	DIV'D YLD	4.3%	VALUE LINE			
TIMELINESS	4	Raised 8/23/24	High: 40.0	39.3	36.5	34.2	37.4	41.8	45.8	46.4	38.6	42.9	40.4	40.4				Target Price Range	2027	2028	2029
SAFETY	3	Lowered 3/8/24	Low: 27.7	32.8	24.2	23.4	32.6	29.6	38.0	23.0	29.2	33.3	31.3	32.1							
TECHNICAL	3	Raised 8/30/24	LEGENDS 25.00 x Dividends p sh ..... Relative Price Strength 2-for-1 split 7/13 Options: Yes Shaded area indicates recession																		
BETA	1.05	(1.00 = Market)																			
18-Month Target Price Range																					
Low-High																					
Midpoint (% to Mid)																					
\$28-\$45																					
\$37 (-10%)																					
2027-29 PROJECTIONS																					
Price	45	Gain (+15%)	Ann'l Total Return	7%																	
High	30	(-25%)	-2%																		
Low																					
Institutional Decisions																					
3Q2023 4Q2023 1Q2024																					
to Buy 197 210 215																					
to Sell 199 206 218																					
Hld's(000) 138173 144477 139254																					
Percent shares traded				18	12																
				6																	
2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	© VALUE LINE PUB. LLC 27-29			
21.77	14.79	19.04	19.96	18.58	14.45	12.30	11.00	11.31	11.32	11.37	11.15	10.61	18.26	16.86	13.36	14.50	15.00	Revenues per sh		17.50	
2.40	2.69	3.01	3.31	3.69	3.46	3.40	3.23	3.31	3.34	3.74	4.02	4.03	4.44	5.63	4.61	4.75	5.05	"Cash Flow" per sh		5.85	
1.25	1.33	1.50	1.73	1.79	1.94	1.98	1.69	1.69	1.92	2.12	2.24	2.08	2.36	2.25	2.07	2.15	2.30	Earnings per sh <sup>A</sup>		2.70	
.70	.71	.73	.76	.80	.85	.95	1.05	1.16	1.27	1.40	1.51	1.58	1.63	1.64	1.66	1.69	1.73	Div'd Decl'd per sh <sup>B</sup>		1.85	
4.01	4.37	4.36	6.48	5.85	4.99	2.86	2.74	3.31	4.13	2.87	3.18	3.25	3.89	5.25	4.49	4.75	4.75	Cap'l Spending per sh		4.75	
10.14	10.52	11.73	13.06	14.00	15.30	16.27	16.66	17.24	19.28	20.06	20.69	18.15	20.27	22.52	22.17	23.10	23.75	Book Value per sh <sup>C</sup>		26.25	
187.00	194.00	195.20	196.20	197.60	198.50	199.40	199.70	199.70	199.70	199.70	200.10	200.10	200.10	200.20	200.30	200.20	200.20	Common Shs Outst'g <sup>D</sup>		200.20	
12.4	10.8	13.3	14.4	15.2	17.7	18.3	17.7	17.7	18.3	16.5	19.0	16.2	14.3	17.2	17.4	Avg Ann'l P/E Ratio			14.0		
.75	.72	.85	.90	.97	.99	.96	.89	.93	.92	.89	1.01	.83	.77	1.00	.96	Relative P/E Ratio			.80		
4.5%	5.0%	3.7%	3.1%	2.9%	2.5%	2.6%	3.5%	3.9%	3.6%	4.0%	3.5%	4.7%	4.8%	4.5%	5.1%	Avg Ann'l Div'd Yield			4.4%		
CAPITAL STRUCTURE as of 9/30/24						2453.1	2196.9	2259.2	2261.1	2270.3	2231.6	2122.3	3653.7	3375.7	2674.3	2900	3000	Revenues (\$mill)		3500	
Total Debt \$5053.2 mill. Due in 5 Yrs \$1731.5 mill.						395.8	337.6	338.2	384.3	425.5	449.6	415.9	472.5	665.7	416.8	430	460	Net Profit (\$mill)		540	
LT Debt \$5020.8 mill. LT Interest \$158.7 mill.						30.4%	29.2%	30.5%	32.5%	14.5%	7.4%	13.2%	11.5%	12.0%	12.0%	12.0%	12.0%	Income Tax Rate		12.0%	
(LT interest earned: 4.3x)						1.7%	3.7%	6.4%	15.0%	8.3%	1.6%	1.6%	2.2%	2.0%	2.0%	2.0%	2.0%	AFUDC % to Net Profit		2.0%	
Leases, Uncapitalized Annual rentals \$5.7 mill.						45.9%	44.3%	41.1%	41.7%	42.0%	43.6%	49.0%	52.6%	49.8%	51.2%	52.0%	51.5%	Long-Term Debt Ratio		50.0%	
Pension Assets-12/22 \$486.0 mill.						54.1%	55.7%	58.9%	58.3%	58.0%	56.4%	51.0%	47.4%	52.4%	49.6%	48.0%	48.5%	Common Equity Ratio		50.0%	
Oblig \$502.9 mill.						5999.7	5971.6	5849.6	6600.7	6902.0	7334.7	7126.2	8552.7	8962.0	9238.2	9750	9935	Total Capital (\$mill)		10400	
Pfd Stock None						6979.9	7322.4	7696.2	8339.9	8643.8	9044.6	9374.6	9832.9	10546.8	11301.0	11000	11250	Net Plant (\$mill)		12075	
Common Stock 200,947,879 shs.						7.8%	6.9%	7.0%	7.0%	7.3%	7.1%	6.9%	6.4%	5.9%	6.3%	7.0%	7.0%	Return on Total Cap'l		7.5%	
CAP: \$8.0 billion (Mid Cap)						12.2%	10.2%	9.8%	10.0%	10.6%	10.9%	11.5%	11.6%	11.0%	12.0%	12.5%	12.5%	Return on Shr. Equity		13.0%	
ELECTRIC OPERATING STATISTICS						12.2%	10.2%	9.8%	10.0%	10.6%	10.9%	11.5%	11.6%	11.0%	12.0%	12.5%	12.5%	Return on Com Equity <sup>E</sup>		13.0%	
2020 2021 2022						6.5%	4.0%	3.3%	3.5%	3.8%	3.6%	2.8%	3.6%	3.0%	3.5%	4.5%	4.5%	Retained to Com Eq		5.5%	
% Change Retail Sales (KWH)						47%	61%	67%	64%	64%	67%	76%	69%	73%	81%	75%	75%	All Div'ds to Net Prof		57%	
Avg. Indust. Use (MWH)						-4.9	+2.6	+8.3													
Avg. Indust. Revs. per KWH (c)						NA	NA	NA													
Peak Load, Summer (Mw)						4.40	7.68	NA													
Annual Load Factor (%)						NA	NA	NA													
% Change Customers (yr-end)						+1.1	+1.4	NA													
Fixed Charge Cov. (c)						326	336	335													
ANNUAL RATES						Past 10 Yrs.	Past 5 Yrs.	Est'd '21-'23 to '27-'29													
of change (per sh)						-3.0%	5.0%	5.5%													
Revenues						2.5%	5.0%	7.0%													
"Cash Flow"						3.0%	4.5%	6.5%													
Earnings						7.5%	6.5%	3.0%													
Dividends						4.0%	1.5%	5.5%													
Book Value																					
Cal-endar	QUARTERLY REVENUES (\$ mill.)				Full Year																
	Mar.31	Jun.30	Sep.30	Dec.31																	
2021	1630.0	577.4	864.4	581.3	3653.7																
2022	589.3	803.7	1270.0	711.9	3375.7																
2023	557.2	605.0	945.4	566.7	2674.3																
2024	596.8	662.6	965.4	675.2	2900																
2025	620	780	950	650	3000																
Cal-endar	EARNINGS PER SHARE <sup>A</sup>				Full Year																
	Mar.31	Jun.30	Sep.30	Dec.31																	
2021	.26	.56	1.26	.28	2.36																
2022	.33	.36	1.31	.25	2.25																
2023	.19	.44	1.20	.24	2.07																
2024	.09	.51	1.09	.46	2.15																
2025	.40	.35	1.30	.25	2.30																
Cal-endar	QUARTERLY DIVIDENDS PAID <sup>B</sup>				Full Year																
	Mar.31	Jun.30	Sep.30	Dec.31																	
2020	.3875	.3875	.3875	.4025	1.57																
2021	.4025	.4025	.4025	.41	1.62																
2022	.41	.41	.41	.4141	1.64																
2023	.4141	.4141	.4141	.4182	1.66																
2024	.4182	.4182	.4182	.4213																	
(A) Diluted EPS. Excl. nonrecurring gains (losses): '15, (.33c); '17, \$.118; '19, (.8c); '20, (\$.295); '21, \$1.32; '22, \$1.06; gain on discount ops.: '19 & '21 EPS don't sum due to rounding.																					
Next earnings report due mid Feb. (B) Div'ds historically paid in late Jan., Apr., July, & Oct. ■ Div'd reinvestment plan avail. (C) Incl. deferred charges. In '22: \$.615/sh. (D) In mill., adj. for										split. (E) Rate base: Net original cost. Rate allowed on com. eq. in OK in '19: 9.5%; in AR in '18: 9.5%; earned on avg. com. eq., '21: 12.7%. Regulatory Climate: Average.										Company's Financial Strength	B++
Stock's Price Stability																					80
Price Growth Persistence																					30
Earnings Predictability																					95

<p><b>(A)</b> Diluted EPS. Excl. nonrec. gain/(loss): '09, '\$1.45'; '17, '8c; gains/(losses) from discount ops.: '08, '28c; '09, '(13c); '10, '18c; '11, '10c; '12, '55c. Qnty. EPS may not sum to full year</p>	<p>due to rounding. Next egs. report due late Feb. (B) Div'ds historically paid in early Mar., June, Sept., &amp; Dec. There were 5 declarations in '12. ■ Div'd reinvestment plan avail.</p>	<p><b>(C)</b> Incl. deferred charges/other intangibles. In '23: \$27.22/sh. <b>(D)</b> In mill. <b>(E)</b> Rate base: Fair value. Rate allowed on common equity in '24: 9.55%-9.85%. Regulatory Climate: Average.</p>	<p><b>Company's Financial Strength</b>  <b>Stock's Price Stability</b>  <b>Price Growth Persistence</b>  <b>Earnings Predictability</b></p>	<p><b>A</b> 85 30 85</p>
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<p>(A) Diluted earnings. Excl. nonrecurring gains/(losses): '13, (42c); '17, (19c); '20, (\$1.03); '22, (14c); '23, (5c); Q1-Q3 '24, (13c). Quarterly EPS may not sum to full year due to rounding. Next earnings report due mid-Feb.</p>	<p>(B) Dividends paid mid-Jan., Apr., July, and Oct. † Dividend reinvestment plan available. ‡ Shareholder investment plan available. (C) Incl.</p>	<p>deferred charges. In '23: \$492 mill., \$4.86/sh. (D) In mill. (E) Rate base: Net original cost. Rate allowed on common equity in '25: 9.34%. Regulatory Climate: Average.</p>	<p><b>Company's Financial Strength</b> <b>Stock's Price Stability</b> <b>Price Growth Persistence</b> <b>Earnings Predictability</b></p>	<p>A 90 90 90</p>
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SOUTHERN COMPANY					NYSE-SO		RECENT PRICE	86.50	P/E RATIO	20.6	(Trailing: 20.6 Median: 17.0)		RELATIVE P/E RATIO	1.13	DIV'D YLD	3.4%	VALUE LINE		
TIMELINESS 4		Lowered 11/29/24		High: 51.3 53.2 54.6 53.5 49.4 64.3 71.1 68.9 80.6 75.8 94.4 86.6		Low: 40.3 41.4 46.0 46.7 42.4 43.3 42.0 56.7 60.7 58.8 65.8 80.5		LEGENDS		..... 23.80 x Dividends p sh								Target Price Range	
SAFETY 2		Lowered 2/21/14																2028 2029 2030	
TECHNICAL 2		Raised 2/7/25																	
BETA .95		(1.00 = Market)																	
18-Month Target Price Range																			
Low-High		Midpoint (% to Mid)																	
\$64-\$98		\$81 (-5%)																	
2028-30 PROJECTIONS																			
Price 105		Gain (+20%)		Ann'l Total Return 8%															
Low 75		(-15%) Nil																	
Institutional Decisions																			
to Buy 822		10/2024 20/2024 30/2024		Percent shares traded															
to Sell 786		822 895 980		18 12 6															
Hld's(000) 707349		786 732 765																	
		735543 829101																	
2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026																			
19.21 20.70 20.41 19.06 19.26 20.34 19.18 20.09 22.86 22.73 20.34 19.29 21.80 26.89 23.15 24.15 24.85 25.80																			
4.43 4.51 4.91 5.18 5.27 5.28 5.47 5.69 6.64 6.41 6.33 6.98 7.20 7.34 7.79 8.25 8.50 8.80																			
2.32 2.36 2.55 2.67 2.70 2.77 2.84 2.83 3.21 3.00 3.17 3.25 3.42 3.61 3.64 4.05 4.30 4.60																			
1.73 1.80 1.87 1.94 2.01 2.08 2.15 2.22 2.30 2.38 2.46 2.54 2.62 2.70 2.78 2.86 2.96 3.05																			
5.70 4.85 5.23 5.54 6.16 6.58 6.22 7.38 7.37 7.74 7.17 7.04 6.83 7.87 8.88 8.85 8.75 8.70																			
18.15 19.21 20.32 21.09 21.43 21.98 22.59 25.00 23.98 23.92 26.11 26.48 26.30 27.93 28.82 29.90 31.75 31.90																			
819.65 843.34 865.13 867.77 887.09 907.78 911.72 990.39 1007.6 1033.8 1053.3 1056.5 1060.0 1089.0 1091.0 1095.0 1095.0 1095.0																			
13.5 14.9 15.8 17.0 16.2 16.0 15.8 17.8 15.5 15.1 17.6 17.9 18.4 19.6 19.1 19.6 19.6 19.6																			
.90 .95 .99 1.08 .91 .84 .80 .93 .78 .82 .94 .92 1.00 1.14 1.06 1.09 1.09 1.09																			
5.5% 5.1% 4.6% 4.3% 4.6% 4.7% 4.8% 4.4% 4.6% 5.3% 4.4% 4.4% 4.2% 4.1% 4.1% 3.4% 3.4% 3.4%																			
CAPITAL STRUCTURE as of 9/30/24																			
Total Debt \$62896 mill. Due in 5 Yrs \$15427 mill.																			
LT Debt \$61254 mill. LT Interest \$1754 mill.																			
Incl. \$215 mill. finance leases.																			
(LT interest earned: 3.3x)																			
Leases, Uncapitalized Annual rentals \$307 mill.																			
Pension Assets-12/23 \$14218 mill.																			
Oblig \$16382 mill.																			
Pfd Stock \$242 mill. Pfd Div'd \$15 mill.																			
Incl. 10 mill. shs. 5.83% cum. pfd. (\$25 stated value); 475,115 shs. 4.2%-5.44% cum. pfd. (\$100 par).																			
Common Stock 1,095,684,180 shs.																			
MARKET CAP: \$94.8 billion (Large Cap)																			
ELECTRIC OPERATING STATISTICS																			
2021 2022 2023																			
% Change Retail Sales (KWH)																			
Avg. Indust. Use (MWH)																			
Avg. Indust. Revs. per KWH (¢)																			
Capacity at Yearend (Mw)																			
Peak Load, Summer (Mw)																			
Annual Load Factor (%)																			
% Change Customers (yr-end)																			
Fixed Charge Cov. (%)																			
270 275 NA																			
ANNUAL RATES																			
Past 10 Yrs. Past 5 Yrs. Est'd '21-'23																			
of change (per sh)																			
Revenues																			
"Cash Flow"																			
Earnings																			
Dividends																			
Book Value																			
Cal-endar																			
QUARTERLY REVENUES (mill.)																			
Mar.31 Jun.30 Sep.30 Dec.31																			
2022 6648 7206 8378 7047																			
2023 6480 5748 6980 6045																			
2024 6646 6463 7274 6067																			
2025 7000 6500 7300 6400																			
2026 7250 6700 7500 6800																			
Cal-endar																			
EARNINGS PER SHARE A																			
Mar.31 Jun.30 Sep.30 Dec.31																			
2022 .97 1.07 1.31 .26																			
2023 .79 .79 1.42 .64																			
2024 1.03 1.10 1.43 .49																			
2025 1.10 1.10 1.50 .60																			
2026 1.15 1.20 1.55 .70																			
Cal-endar																			
QUARTERLY DIVIDENDS PAID B																			
Mar.31 Jun.30 Sep.30 Dec.31																			
2021 .64 .66 .66 .66																			
2022 .66 .68 .68 .68																			
2023 .68 .70 .70 .70																			
2024 .70 .72 .72 .72																			
2025																			
2026																			
BUSINESS:																			
The Southern Company, through its subsidiaries, supplies electricity to 4.4 mill. customers in GA, AL, and MS. Also has a competitive generation business. Acqd of AGL Resources (renamed Southern Company Gas, 4.4 mill. customers in GA, NJ, IL, VA, & TN) 7/16. Sold Gulf Power 1/19. Electric revenue breakdown: residential, 43%; commercial, 35%; industrial, 21%; other, 1%.																			
We look for Southern Company's earnings to advance moderately in 2025. Our profit estimate this year remains unchanged at \$4.30 per share, implying 6% growth, which is in line with the utility's long-term 5%-7% target. The recent completion of the Vogtle Nuclear Construction Project should start to benefit results in 2025 and beyond. The Vogtle plant stands to deliver 2,200 megawatts of reliable, carbon free energy for decades, and is the largest generator of clean energy in the U.S. In turn, Southern is increasingly well positioned to take advantage of the clean energy transition and elevated power demand due to technological advancements.																			
We have introduced our top- and bottom-line estimates for 2026. We think the company will post similar growth in 2026, within management's long-term targets. The demand for nuclear power expansion and electricity should remain elevated for the foreseeable future. And, Southern continues to expect that the U.S. will need to install more than 10 gigawatts of nuclear power to meet increased electricity demand in the coming																			
years. Accordingly, we look for earnings of \$4.60 per share and revenues of \$28.25 billion.																			
These shares have fallen a bit in value since our early November report. The stock is down more than 5% over that interim, partly due to weak projected year over year earnings comparisons as well as increased energy transition costs. Still, Southern shares are up more than 25% over the past year, along with the sharp rise in demand for nuclear power expansion and electricity.																			
This issue is best suited for conservative, income-oriented investors. Indeed, the utility pays a solid dividend, which remains its most notable feature, and is ranked Above Average (2) for Safety. But, many of its peers pay even higher dividends. What's more, intermediate- and long-term capital appreciation potential is weak at this juncture. After rolling out our estimates to 2028-2030, the recent quotation is already well within our new range of \$75-\$105. The recent price also stands above the midpoint of our 18-month Target Price Range.																			
Zachary Hodgkinson February 7, 2025																			

TXNM ENERGY NYSE-TXNM										RECENT PRICE	47.18	P/E RATIO	17.1 (Trailing: 18.0 Median: 19.0)	RELATIVE P/E RATIO	0.94	DIV'D YLD	3.5%	VALUE LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							
TIMELINESS	3	Raised 11/29/24	High: 24.5 31.6 31.2 36.2 46.0 45.3 53.0 56.1 50.1 49.3 49.6 50.3	Low: 20.1 23.5 24.4 29.2 33.3 33.8 39.7 27.1 43.8 43.4 41.4 34.6																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					</

XCEL ENERGY NDQ-XEL				RECENT PRICE	65.14	P/E RATIO	17.7 (Trailing: 18.8 Median: 20.0)	RELATIVE P/E RATIO	0.98	DIV'D YLD	3.5%	VALUE LINE																				
TIMELINESS	4	Lowered 10/11/24	High: 31.8 37.6 38.3 45.4 52.2 54.1 66.1 76.4 72.9 77.7 73.0 73.4	Low: 26.8 27.3 31.8 35.2 40.0 41.5 47.7 46.6 57.2 56.9 53.7 46.8									Target Price Range																			
SAFETY	2	Lowered 1/19/24	LEGENDS 29.4 x Dividends p sh Relative Price Strength Options: Yes Shaded area indicates recession																													
TECHNICAL	1	Raised 1/17/25																														
BETA	.85	(1.00 = Market)																														
18-Month Target Price Range																																
Low-High Midpoint (% to Mid)																																
\$54-\$84 \$69 (10%)																																
2027-29 PROJECTIONS																																
High	Price	Gain	Ann'l Total																													
Low	90	(+40%)	11%																													
	70	(+5%)	6%																													
Institutional Decisions																																
to Buy 102024 433 202024 467 302024 518																																
to Sell 502 414 408																																
Hld's(000) 437447 437414 503378																																
				Percent	30																											
				shares	20																											
				traded	10																											
2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	© VALUE LINE PUB. LLC	27-29													
24.69	21.08	21.38	21.90	20.76	21.92	23.11	21.72	21.90	22.46	22.44	21.98	21.45	24.69	27.86	25.60	24.55	27.05	Revenues per sh	31.10													
3.50	3.48	3.51	3.79	4.00	4.10	4.28	4.56	5.04	5.47	5.92	6.25	6.61	7.08	7.81	7.96	8.40	9.10	"Cash Flow" per sh	10.95													
1.46	1.49	1.56	1.72	1.85	1.91	2.03	2.10	2.21	2.30	2.47	2.64	2.79	2.96	3.17	3.35	3.55	3.80	Earnings per sh <sup>A</sup>	4.55													
.94	.97	1.00	1.03	1.07	1.11	1.20	1.28	1.36	1.44	1.52	1.62	1.72	1.83	1.95	2.08	2.19	2.30	Div'd Decl'd per sh <sup>B = †</sup>	2.74													
4.66	3.91	4.60	4.53	5.27	6.82	6.33	7.26	6.42	6.54	7.70	8.05	9.99	7.80	8.44	10.55	13.00	15.00	Cap'l Spending per sh	13.00													
15.35	15.92	16.76	17.44	18.19	19.21	20.20	20.89	21.73	22.56	23.78	25.24	27.12	28.70	30.34	31.74	34.20	36.00	Book Value per sh <sup>C</sup>	41.90													
453.79	457.51	482.33	486.49	487.96	497.97	505.73	507.54	507.22	507.76	514.04	524.54	537.44	544.03	549.58	554.94	575.00	580.00	Common Shs Outst'g <sup>D</sup>	595.00													
13.7	12.7	14.1	14.2	14.8	15.0	15.4	16.5	18.5	20.2	18.9	22.3	23.9	22.5	22.2	19.0	16.8		Avg Ann'l P/E Ratio	17.5													
.82	.85	.90	.89	.94	.84	.81	.83	.97	1.02	1.02	1.19	1.23	1.22	1.28	1.06	.93		Relative P/E Ratio	.95													
4.7%	5.1%	4.5%	4.2%	3.9%	3.9%	3.8%	3.7%	3.3%	3.1%	3.3%	2.7%	2.6%	2.8%	2.8%	3.3%	3.7%		Avg Ann'l Div'd Yield	3.4%													
CAPITAL STRUCTURE as of 9/30/24				11686	11024	11107	11404	11537	11529	11526	13431	15310	14206	14120	15700	Revenues (\$mill)	18500															
Total Debt \$28670 mill. Due in 5 Yrs \$3790 mill.				1021.3	1063.6	1123.4	1171.0	1261.0	1372.0	1473.0	1597.0	1736.0	1851.0	1995	2200	Net Profit (\$mill)	2700															
LT Debt \$27471 mill. LT Interest \$1150 mill.				33.9%	35.8%	34.1%	30.7%	12.6%	8.5%	--	--	--	--	NMF	NMF	Income Tax Rate	NMF															
Incl. \$218 mill. finance leases.				12.5%	7.7%	7.8%	9.4%	12.4%	8.3%	10.7%	6.2%	5.9%	7.7%	10.0%	9.0%	AFUDC % to Net Profit	9.0%															
(Total Interest Coverage: 2.7x)				53.0%	54.1%	56.3%	55.9%	56.4%	56.8%	57.4%	58.2%	57.8%	58.6%	58.0%	61.0%	Long-Term Debt Ratio	61.0%															
Leases, Uncapitalized Annual rentals \$277 mill.				47.0%	45.9%	43.7%	44.1%	43.6%	43.2%	42.6%	41.8%	42.2%	41.4%	42.0%	39.0%	Common Equity Ratio	39.0%															
Pension Assets-12/23 \$2690 mill.				21714	23092	25216	25975	28025	30646	34220	37391	39488	42529	47100	53200	Total Capital (\$mill)	64225															
Oblig. \$2943 mill.				28757	31206	32842	34329	36944	39483	42950	45457	48253	51642	56225	62450	Net Plant (\$mill)	74050															
Pfd Stock None				6.0%	5.8%	5.7%	5.8%	5.7%	5.6%	5.4%	5.3%	5.5%	5.4%	5.5%	5.0%	Return on Total Cap'l	5.5%															
Common Stock 574,241,745 shs.				10.0%	10.0%	10.2%	10.2%	10.3%	10.4%	10.1%	10.2%	10.4%	10.5%	10.0%	10.5%	Return on Shr. Equity	11.0%															
as of 10/28/24				10.0%	10.0%	10.2%	10.2%	10.3%	10.4%	10.1%	10.2%	10.4%	10.5%	10.0%	10.5%	Return on Com Equity <sup>E</sup>	11.0%															
MARKET CAP: \$37.4 billion (Large Cap)				4.5%	4.3%	4.0%	3.9%	4.3%	4.4%	4.2%	4.2%	4.3%	4.3%	4.0%	4.0%	Retained to Com Eq	4.5%															
ELECTRIC OPERATING STATISTICS				55%	57%	61%	62%	58%	58%	58%	59%	59%	59%	62%	60%	All Div's to Net Prof	60%															
2021 2022 2023																																
% Change Retail Sales (KWH)																																
Res'd'l Revs. per KWH (¢)																																
C & I Revs. per KWH (¢)																																
Capacity at Peak (Mw)																																
Peak Load, Summer (Mw)																																
Annual Load Factor (%)																																
% Change Customers (yr-end)																																
Fixed Charge Cov. (%)				262	255	245																										
ANNUAL RATES				Past 10 Yrs	Past 5 Yrs	Est'd '21-'23																										
of change (per sh)				10 Yrs	5 Yrs	to '27-'29																										
Revenues				2.0%	3.0%	3.0%																										
"Cash Flow"				7.0%	7.0%	6.0%																										
Earnings				5.5%	6.5%	6.5%																										
Dividends				6.0%	6.5%	6.0%																										
Book Value				5.0%	6.0%	5.5%	<div><b>BUSINESS:</b> Xcel Energy Inc. is the parent of Northern States Power Company (NSP), which supplies electricity to MN, WI, ND, SD &amp; MI &amp; gas to MN, WI, ND &amp; MI; Public Service Company of Colorado (PSCo), which supplies electricity &amp; gas to CO; &amp; Southwestern Public Service Company (SPS), which supplies electricity to TX and NM. Customers: 3.8 mill. electric, 2.2 mill. gas. Electric revenues: resid'l, 31%; comm'l &amp; ind'l, 50%; other, 19%. Purchases 34% of power, owns 66%. Total electric mix: wind, 29%; gas, 23%; coal, 13%; nuclear, 24%; solar/other, 11%. Fuel cost: 40% of revenues. '23 deprec. rate: 3.6%. Employs 11,311. Chrmn., President, and CEO: Robert Frenzel, Inc.: MN. Addr.: 414 Nicollet Mall, Minneapolis, MN 55401. Tel.: 612-330-5500. Int.: www.xcelenergy.com</div>																									
QUARTERLY REVENUES (\$ mill.)				Full Year																												
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31																												
2021	3541	3068	3467	3355	13431																											
2022	3751	3424	4082	4053	15310																											
2023	4080	3022	3662	3442	14206																											
2024	3649	3028	3644	3799	14120																											
2025	4100	3400	4125	4075	15700																											
EARNINGS PER SHARE <sup>A</sup>				Full Year																												
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31																												
2021	.67	.58	1.13	.58	2.96																											
2022	.70	.60	1.18	.69	3.17																											
2023	.76	.52	1.23	.83	3.35																											
2024	.88	.54	1.25	.88	3.55																											
2025	.90	.65	1.35	.90	3.80																											
QUARTERLY DIVIDENDS PAID <sup>B = †</sup>				Full Year																												
Cal-endar	Mar.31	Jun.30	Sep.30	Dec.31																												
2021	.43	.4575	.4575	.4575	1.80																											
2022	.4575	.4875	.4875	.4875	1.92																											
2023	.4875	.52	.52	.52	2.05																											
2024	.52	.5475	.5475	.5475	2.16																											
2025	.5475																															
(A) Diluted EPS. Excl. nonrec. gain/(losses): 10, 5¢; '15, (16¢); '17, (5¢); '23, (14¢); gain/(loss) on discontinued ops.: '09, (1¢); '10, 1¢. Qlty. EPS may not sum to total yr. due to round-																																
ing. Next eps. report due Feb. 6th.																																
(B) Div'ds typically paid mid-Jan., Apr., July, and Oct. ' Div'd reinvestment plan available.																																
† Shareholder investment plan available.																																
(C) Incl. intangibles. In '23: \$2798 mill., \$5.04/sh. (D) In mill. (E) Rate base: Varies. Rate allowed on common equity (blended): 9.6%. Regulatory Climate: Average.																																
Company's Financial Strength				A																												
Stock's Price Stability				95																												
Price Growth Persistence				55																												
Earnings Predictability				100																												

Kentucky Utilities Company / Louisville Gas & Electric Company  
Indicated Common Equity Cost Rate  
Through Use of a Risk Premium Model  
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Seven Natural Gas Distribution Companies</u>	<u>Proxy Group of Seven Natural Gas Distribution Companies (excl. PRPM)</u>	<u>Proxy Group of Fifteen Electric Companies</u>	<u>Proxy Group of Fifteen Electric Companies (excl. PRPM)</u>
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	5.35 %	5.35 %	5.35 %	5.35 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A2 Rated Public Utility Bonds (2)	<u>0.38</u>	<u>0.38</u>	<u>0.38</u>	<u>0.38</u>
3.	Adjusted Prospective Yield on A2 Rated Public Utility Bonds	5.73 %	5.73	5.73 %	5.73
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group	<u>0.07 (3)</u>	<u>0.07</u>	<u>0.13 (4)</u>	<u>0.13</u>
5.	Adjusted Bond Yield	5.80 %	5.80	5.86 %	5.86
6.	Equity Risk Premium (5)	<u>5.06</u>	<u>5.01</u>	<u>4.93</u>	<u>4.88</u>
7.	Risk Premium Derived Common Equity Cost Rate	<u>10.86 %</u>	<u>10.81 %</u>	<u>10.79</u>	<u>10.74 %</u>

Notes: (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 7 and 8 of this Exhibit).

(2) The average yield spread of A2 rated public utility bonds over Aaa rated corporate bonds of 0.38% from page 2 of this Exhibit.

(3) Adjustment to reflect the A3 Moody's LT issuer rating of the Proxy Group of Seven Natural Gas Distribution Companies as shown on page 3 of this Exhibit. The 0.07% upward adjustment is derived by taking 1/3 of the spread between A2 and Baa2 Public Utility Bonds ( $1/3 * 0.20\% = 0.07\%$ ) as derived from page 2 of this Exhibit.

(4) Adjustment to reflect the Baa1 Moody's LT issuer rating of the Proxy Group of Fifteen Electric Companies as shown on page 3 of this Exhibit. The 0.13% upward adjustment is derived by taking 2/3 of the spread between A2 and Baa2 Public Utility Bonds ( $2/3 * 0.20\% = 0.13\%$ ) as derived from page 2 of this Exhibit.

(5) From page 5 of this Exhibit.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Interest Rates and Bond Spreads for  
Moody's Corporate and Public Utility Bonds

Selected Bond Yields

	[1]	[2]	[3]
	<u>Aaa Rated Corporate Bond</u>	<u>A2 Rated Public Utility Bond</u>	<u>Baa2 Rated Public Utility Bond</u>
Feb-2025	5.32 %	5.73 %	5.90 %
Jan-2025	5.46	5.81	6.05
Dec-2024	<u>5.20</u>	<u>5.58</u>	<u>5.77</u>
Average	<u>5.33 %</u>	<u>5.71 %</u>	<u>5.91 %</u>

Selected Bond Spreads

A2 Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:

0.38 % (1)

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

0.20 % (2)

Notes:

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

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

Source of Information:

Bloomberg Professional Services

Kentucky Utilities Company / Louisville Gas & Electric Company  
Comparison of Long-Term Issuer Ratings for the  
Proxy Group of Forty-Nine Non-Price Regulated Companies

	Moody's		Standard & Poor's	
	Long-Term Issuer Rating		Long-Term Issuer Rating	
	February 2025		February 2025	
Proxy Group of Seven Natural Gas Distribution Companies	Long-Term Issuer Rating (1)	Numerical Weighting (2)	Long-Term Issuer Rating (1)	Numerical Weighting (2)
Atmos Energy Corporation	A1	5.0	A-	7.0
New Jersey Resources Corporation	A1	5.0	NR	- -
NiSource Inc.	Baa1	8.0	BBB+	8.0
Northwest Natural Holding Company	Baa1	8.0	A+	5.0
ONE Gas, Inc.	A3	7.0	A-	7.0
Southwest Gas Holding Company	Baa1	8.0	BBB	9.0
Spire Inc.	A1/A2	5.5	BBB+	8.0
Average	A3	6.6	A-	7.3
Louisville Gas & Electric Company	A3	7.0	A-	7.0
Proxy Group of Fifteen Electric Companies	Long-Term Issuer Rating (1)	Numerical Weighting (2)	Long-Term Issuer Rating (1)	Numerical 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	BBB+	8.0
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
Eversource Energy, Inc.	Baa1	8.0	BBB+	8.0
IDACORP, Inc.	Baa1	8.0	BBB	9.0
North Western Corporation	Baa2	9.0	BBB	9.0
OGE Energy Corporation	A3	7.0	A-	7.0
Pinnacle West Capital Corporation	Baa1	8.0	BBB+	8.0
Portland General Electric Company	A3	7.0	BBB+	8.0
Southern Company	A2/A3	6.5	A-	7.0
TXNM Energy, Inc.	Baa1/Baa2	8.5	BBB+/BBB	8.5
Xcel Energy Inc.	A3	7.0	BBB+	8.0
Average	Baa1	7.7	BBB+	8.0
Kentucky Utilities Company	A3	7.0	A-	7.0
Louisville Gas & Electric Company	A3	7.0	A-	7.0

Notes:

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

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

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

Moody's Bond Rating	Numerical Bond Weighting	Standard & Poor's Bond Rating
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-

Kentucky Utilities Company / Louisville Gas & Electric Company  
Judgment of Equity Risk Premium for the  
Proxy Group of Forty-Nine Non-Price Regulated Companies

Line No.		Proxy Group of Seven Natural Gas Distribution Companies	Proxy Group of Seven Natural Gas Distribution Companies (excl. PRPM)	Proxy Group of Fifteen Electric Companies	Proxy Group of Fifteen Electric Companies (excl. PRPM)
1.	Calculated equity risk premium based on the total market using the beta approach (1)	5.68 %	5.66 %	5.25 %	5.23 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A2 rated bonds (2)	4.76	4.65	4.76	4.65
3.	Predicted Equity Risk Premium Based on Regression Analysis of 848 Fully-Litigated Natural Gas Rate Cases (3)	4.73	4.73	NA	NA
4.	Predicted Equity Risk Premium Based on Regression Analysis of 1,257 Fully-Litigated Electric Rate Cases (4)	NA	NA	4.77	4.77
5.	Average equity risk premium	5.06 %	5.01 %	4.93 %	4.88 %

Notes: (1) From page 6 of this Exhibit.  
(2) From page 9 of this Exhibit.  
(3) From page 10 of this Exhibit.  
(3) From page 11 of this Exhibit.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Derivation of Equity Risk Premium Based on the Total Market Approach  
Using the Beta for the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Line No.	Equity Risk Premium Measure	Proxy Group of Seven Natural Gas Distribution Companies		Proxy Group of Seven Natural Gas Distribution Companies(excl. PRPM)		Proxy Group of Fifteen Electric Companies		Proxy Group of Fifteen Electric Companies(excl. PRPM)	
1.	Kroll Equity Risk Premium (1)	6.10	%	6.10	%	6.10	%	6.10	%
2.	Regression on Kroll Risk Premium Data (2)	6.82		6.82		6.82		6.82	
3.	Kroll Equity Risk Premium based on PRPM (3)	7.32		NA		7.32		NA	
4	Equity Risk Premium Based on Value Line Summary and Index (4)	5.85		5.85		5.85		5.85	
5.	Equity Risk Premium Based on Bloomberg, Value Line, and S&P Global Market Intelligence S&P 500 Companies (5)	9.88		9.88		9.88		9.88	
6.	Conclusion of Equity Risk Premium	7.19	%	7.16	%	7.19	%	7.16	%
7.	Adjusted Beta (6)	0.79		0.79		0.73		0.73	
8.	Forecasted Equity Risk Premium	5.68	%	5.66	%	5.25	%	5.23	%

Notes:

- (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Kroll Cost of Capital Navigator and Bloomberg Professional Services minus the arithmetic mean monthly yield of Moody's average Aaa and Aa2 corporate bonds from 1928-2024.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of large company common stocks relative to Moody's average Aaa and Aa2 rated corporate bond yields from 1928-2024 referenced in Note 1 above. Using the equation generated from the regression, an expected equity risk premium is calculated using the average consensus forecast of Aaa corporate bonds of 5.35% (from page 1 of this Exhibit).
- (3) The Predictive Risk Premium Model (PRPM) is discussed in the accompanying direct testimony. The Ibbotson equity risk premium based on the PRPM is derived by applying the PRPM to the monthly risk premiums between Ibbotson large company common stock monthly returns and average Aaa and Aa corporate monthly bond yields, from January 1928 through February 2025.
- (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 5.35% (from page 1 of this Exhibit) from the projected 3-5 year total annual market return of 11.20% (described fully in note 1 on page 2 of Exhibit DWD-5).
- (5) Using data from the Bloomberg Professional Services, Value Line, and S&P Global Market Intelligence for the S&P 500 for the S&P 500, an expected total return of 15.23% was derived based upon expected dividend yields as a proxy for income returns and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 5.35% results in an expected equity risk premium of 9.88%.
- (6) Average of mean and median beta for each proxy group from page 1 of Exhibit DWD-5.

Sources of Information:

Kroll Cost of Capital Navigator  
Industrial Manual and Mergent Bond Record Monthly Update.  
Value Line Summary and Index  
Blue Chip Financial Forecasts, November 27, 2024 and February 28, 2025  
S&P Capital IQ  
Bloomberg Professional Services

## 2 ■ BLUE CHIP FINANCIAL FORECASTS ■ FEBRUARY 28, 2025

## 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 2025	2Q 2025	3Q 2025	4Q 2025	1Q 2026	2Q 2026
	Feb 21	Feb 14	Feb 7	Jan 31	Jan	Dec	Nov	4Q 2024	2025	2025	2025	2025	2026	2026
Federal Funds Rate	4.33	4.33	4.33	4.33	4.33	4.48	4.64	4.65	4.4	4.3	4.1	4.0	3.9	3.8
Prime Rate	7.50	7.50	7.50	7.50	7.50	7.65	7.81	7.82	7.5	7.4	7.3	7.1	7.0	6.9
SOFR	4.34	4.33	4.34	4.36	4.32	4.53	4.64	4.67	4.3	4.3	4.1	4.0	3.9	3.7
Commercial Paper, 1-mo.	4.32	4.31	4.30	4.30	4.32	4.50	4.62	4.63	4.3	4.3	4.1	4.0	3.9	3.7
Treasury bill, 3-mo.	4.33	4.35	4.34	4.31	4.34	4.39	4.62	4.58	4.3	4.2	4.0	3.9	3.8	3.7
Treasury bill, 6-mo.	4.33	4.32	4.28	4.27	4.26	4.32	4.43	4.40	4.3	4.1	4.0	3.9	3.8	3.7
Treasury bill, 1 yr.	4.20	4.26	4.20	4.15	4.18	4.23	4.33	4.25	4.2	4.1	4.0	3.9	3.8	3.7
Treasury note, 2 yr.	4.26	4.30	4.23	4.19	4.27	4.23	4.26	4.15	4.2	4.1	4.0	3.9	3.9	3.8
Treasury note, 5 yr.	4.34	4.38	4.30	4.33	4.43	4.25	4.23	4.13	4.4	4.3	4.2	4.1	4.1	4.0
Treasury note, 10 yr.	4.50	4.53	4.49	4.55	4.63	4.39	4.36	4.28	4.5	4.5	4.4	4.4	4.3	4.3
Treasury note, 30 yr.	4.74	4.74	4.70	4.78	4.85	4.58	4.54	4.50	4.7	4.7	4.7	4.6	4.6	4.6
Corporate Aaa bond	5.43	5.45	5.41	5.47	5.55	5.29	5.23	5.20	5.5	5.4	5.4	5.4	5.4	5.4
Corporate Baa bond	5.85	5.88	5.84	5.88	5.97	5.71	5.66	5.63	6.2	6.2	6.2	6.2	6.2	6.2
State & Local bonds	4.18	4.19	4.16	4.14	4.18	4.10	4.08	4.08	4.4	4.4	4.4	4.4	4.4	4.4
Home mortgage rate	6.85	6.87	6.89	6.95	6.96	6.72	6.81	6.65	6.9	6.8	6.7	6.6	6.5	6.5

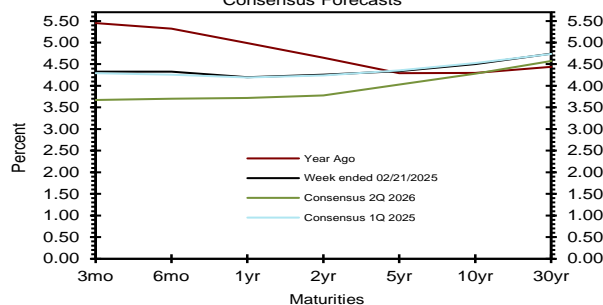
  

Key Assumptions	History								Consensus Forecasts-Quarterly					
	1Q 2023	2Q 2023	3Q 2023	4Q 2023	1Q 2024	2Q 2024	3Q 2024	4Q 2024	1Q 2025	2Q 2025	3Q 2025	4Q 2025	1Q 2026	2Q 2026
Fed's AFE \$ Index	115.5	114.6	115.0	116.6	115.5	117.3	114.9	117.9	119.9	120.0	119.3	118.5	118.0	117.5
Real GDP	2.8	2.4	4.4	3.2	1.6	3.0	3.1	2.3	2.3	2.0	1.9	1.9	2.0	2.0
GDP Price Index	3.6	1.9	3.2	1.5	3.0	2.5	1.9	2.4	2.7	2.5	2.5	2.5	2.5	2.2
Consumer Price Index	3.7	3.0	3.5	2.8	3.7	2.8	1.4	3.0	3.5	2.7	2.6	2.6	2.6	2.5
PCE Price Index	3.9	2.9	2.7	1.7	3.4	2.5	1.5	2.4	2.8	2.6	2.5	2.5	2.5	2.3

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

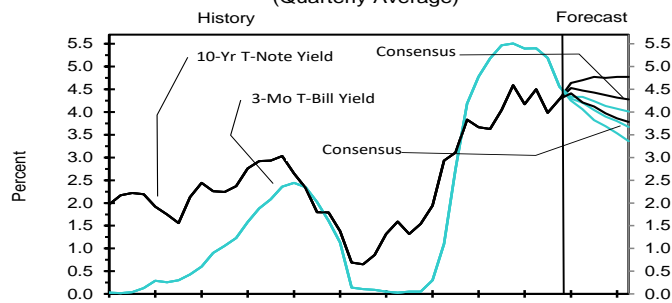
## US Treasury Yield Curve

Week ended Feb 21, 2025 & Year Ago vs.  
1Q 2025 & 2Q 2026  
Consensus Forecasts



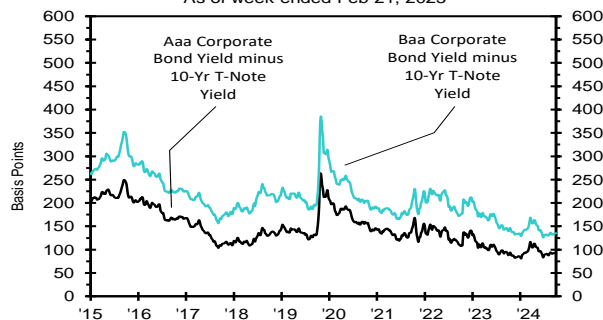
## US 3-Mo T-Bills &amp; 10-Yr T-Note Yield

(Quarterly Average)



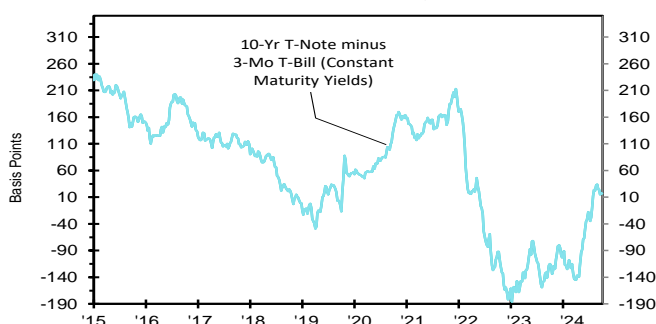
## Corporate Bond Spreads

As of week ended Feb 21, 2025



## US Treasury Yield Curve

As of week ended Feb 21, 2025



## 14 ■ BLUE CHIP FINANCIAL FORECASTS ■ NOVEMBER 27, 2024

**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 2026 through 2030 and averages for the five-year periods 2026-2030 and 2031-2035. 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	
		2026	2027	2028	2029	2030	2026-2030	2031-2035
1. Federal Funds Rate	<b>CONSENSUS</b>	<b>3.4</b>	<b>3.3</b>	<b>3.3</b>	<b>3.2</b>	<b>3.2</b>	<b>3.3</b>	<b>3.2</b>
	Top 10 Average	3.7	3.7	3.6	3.7	3.7	3.7	3.6
	Bottom 10 Average	3.0	2.9	2.9	2.9	2.8	2.9	2.9
2. Prime Rate	<b>CONSENSUS</b>	<b>6.5</b>	<b>6.4</b>	<b>6.4</b>	<b>6.4</b>	<b>6.3</b>	<b>6.4</b>	<b>6.3</b>
	Top 10 Average	6.8	6.8	6.7	6.8	6.7	6.7	6.7
	Bottom 10 Average	6.2	6.1	6.1	6.0	5.9	6.1	5.9
3. SOFR	<b>CONSENSUS</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>
	Top 10 Average	3.6	3.6	3.6	3.6	3.6	3.6	3.6
	Bottom 10 Average	3.1	3.0	3.0	2.9	2.9	3.0	2.9
4. Commercial Paper, 1-Mo	<b>CONSENSUS</b>	<b>3.4</b>	<b>3.4</b>	<b>3.4</b>	<b>3.4</b>	<b>3.3</b>	<b>3.4</b>	<b>3.3</b>
	Top 10 Average	3.6	3.6	3.6	3.6	3.6	3.6	3.6
	Bottom 10 Average	3.2	3.1	3.1	3.0	3.0	3.1	3.0
5. Treasury Bill Yield, 3-Mo	<b>CONSENSUS</b>	<b>3.3</b>	<b>3.3</b>	<b>3.2</b>	<b>3.2</b>	<b>3.2</b>	<b>3.3</b>	<b>3.2</b>
	Top 10 Average	3.6	3.6	3.5	3.6	3.6	3.6	3.5
	Bottom 10 Average	3.1	3.0	2.9	2.9	2.8	2.9	2.8
6. Treasury Bill Yield, 6-Mo	<b>CONSENSUS</b>	<b>3.4</b>	<b>3.3</b>	<b>3.3</b>	<b>3.2</b>	<b>3.2</b>	<b>3.3</b>	<b>3.2</b>
	Top 10 Average	3.6	3.6	3.6	3.6	3.6	3.6	3.6
	Bottom 10 Average	3.1	3.0	3.0	2.9	2.8	3.0	2.9
7. Treasury Bill Yield, 1-Yr	<b>CONSENSUS</b>	<b>3.4</b>	<b>3.4</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>	<b>3.3</b>
	Top 10 Average	3.7	3.7	3.6	3.6	3.6	3.6	3.6
	Bottom 10 Average	3.2	3.1	3.0	3.0	2.9	3.0	2.9
8. Treasury Note Yield, 2-Yr	<b>CONSENSUS</b>	<b>3.6</b>	<b>3.6</b>	<b>3.5</b>	<b>3.5</b>	<b>3.5</b>	<b>3.5</b>	<b>3.5</b>
	Top 10 Average	3.9	3.9	3.9	3.9	3.9	3.9	3.9
	Bottom 10 Average	3.3	3.2	3.1	3.1	3.0	3.1	3.0
9. Treasury Note Yield, 5-Yr	<b>CONSENSUS</b>	<b>3.8</b>	<b>3.8</b>	<b>3.8</b>	<b>3.8</b>	<b>3.7</b>	<b>3.8</b>	<b>3.8</b>
	Top 10 Average	4.2	4.3	4.3	4.3	4.3	4.3	4.3
	Bottom 10 Average	3.4	3.4	3.3	3.3	3.2	3.3	3.2
10. Treasury Note Yield, 10-Yr	<b>CONSENSUS</b>	<b>4.0</b>	<b>4.1</b>	<b>4.0</b>	<b>4.0</b>	<b>3.9</b>	<b>4.0</b>	<b>4.0</b>
	Top 10 Average	4.5	4.6	4.5	4.5	4.5	4.5	4.5
	Bottom 10 Average	3.6	3.5	3.4	3.4	3.3	3.5	3.4
11. Treasury Bond Yield, 30-Yr	<b>CONSENSUS</b>	<b>4.3</b>	<b>4.4</b>	<b>4.3</b>	<b>4.3</b>	<b>4.2</b>	<b>4.3</b>	<b>4.2</b>
	Top 10 Average	4.7	4.8	4.8	4.8	4.8	4.8	4.7
	Bottom 10 Average	3.9	3.9	3.8	3.8	3.7	3.8	3.8
12. Corporate Aaa Bond Yield	<b>CONSENSUS</b>	<b>5.1</b>	<b>5.2</b>	<b>5.2</b>	<b>5.1</b>	<b>5.1</b>	<b>5.2</b>	<b>5.1</b>
	Top 10 Average	5.5	5.7	5.6	5.6	5.6	5.6	5.5
	Bottom 10 Average	4.8	4.8	4.7	4.7	4.6	4.7	4.6
13. Corporate Baa Bond Yield	<b>CONSENSUS</b>	<b>6.0</b>	<b>6.1</b>	<b>6.0</b>	<b>6.0</b>	<b>6.0</b>	<b>6.0</b>	<b>5.9</b>
	Top 10 Average	6.4	6.6	6.5	6.5	6.4	6.5	6.4
	Bottom 10 Average	5.7	5.7	5.6	5.6	5.5	5.6	5.5
14. State & Local Bonds Yield	<b>CONSENSUS</b>	<b>4.1</b>	<b>4.3</b>	<b>4.2</b>	<b>4.2</b>	<b>4.3</b>	<b>4.2</b>	<b>4.1</b>
	Top 10 Average	4.5	4.6	4.6	4.6	4.6	4.6	4.6
	Bottom 10 Average	3.8	3.9	3.9	3.9	3.9	3.9	3.6
15. Home Mortgage Rate	<b>CONSENSUS</b>	<b>6.2</b>	<b>6.1</b>	<b>6.0</b>	<b>6.0</b>	<b>5.9</b>	<b>6.0</b>	<b>5.9</b>
	Top 10 Average	6.6	6.6	6.5	6.4	6.4	6.5	6.4
	Bottom 10 Average	5.7	5.7	5.6	5.5	5.4	5.6	5.4
A. Fed's AFE Nominal \$ Index	<b>CONSENSUS</b>	<b>115.5</b>	<b>115.0</b>	<b>114.5</b>	<b>113.9</b>	<b>113.2</b>	<b>114.4</b>	<b>112.6</b>
	Top 10 Average	117.0	116.3	115.8	115.3	114.8	115.8	114.6
	Bottom 10 Average	113.9	113.6	113.1	112.5	111.8	113.0	110.9
		Year-Over-Year, % Change					Five-Year Averages	
		2026	2027	2028	2029	2030	2026-2030	2031-2035
B. Real GDP	<b>CONSENSUS</b>	<b>1.9</b>	<b>2.0</b>	<b>2.0</b>	<b>2.0</b>	<b>2.0</b>	<b>2.0</b>	<b>1.9</b>
	Top 10 Average	2.2	2.3	2.3	2.2	2.2	2.2	2.2
	Bottom 10 Average	1.7	1.7	1.8	1.7	1.7	1.7	1.7
C. GDP Chained Price Index	<b>CONSENSUS</b>	<b>2.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.1</b>
	Top 10 Average	2.4	2.3	2.3	2.3	2.3	2.3	2.3
	Bottom 10 Average	2.1	2.0	2.0	2.0	2.0	2.0	2.0
D. Consumer Price Index	<b>CONSENSUS</b>	<b>2.4</b>	<b>2.3</b>	<b>2.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.2</b>	<b>2.2</b>
	Top 10 Average	2.6	2.5	2.4	2.5	2.4	2.5	2.4
	Bottom 10 Average	2.1	2.0	2.0	2.0	2.0	2.0	2.0
E. PCE Price Index	<b>CONSENSUS</b>	<b>2.2</b>	<b>2.2</b>	<b>2.1</b>	<b>2.1</b>	<b>2.1</b>	<b>2.2</b>	<b>2.1</b>
	Top 10 Average	2.5	2.3	2.3	2.3	2.3	2.3	2.3
	Bottom 10 Average	2.0	2.0	1.9	2.0	2.0	2.0	2.0

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

<u>Line No.</u>		<u>Implied Equity Risk Premium</u>	<u>Implied Equity Risk Premium (excl. PRPM)</u>
1.	Historical Equity Risk Premium (1)	4.16 %	4.16 %
2.	Regression of Historical Equity Risk Premium (2)	4.80	4.80
3	Forecasted Equity Risk Premium Based on PRPM (3)	5.07	NA
4.	Forecasted Equity Risk Premium based on Projected Total Return on the S&P Utilities Index (Bloomberg, Value Line, and S&P Capital IQ Data) (4)	<u>5.00</u>	<u>5.00</u>
5.	Average Equity Risk Premium (5)	<u>4.76 %</u>	<u>4.65 %</u>

Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1928-2024. 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.

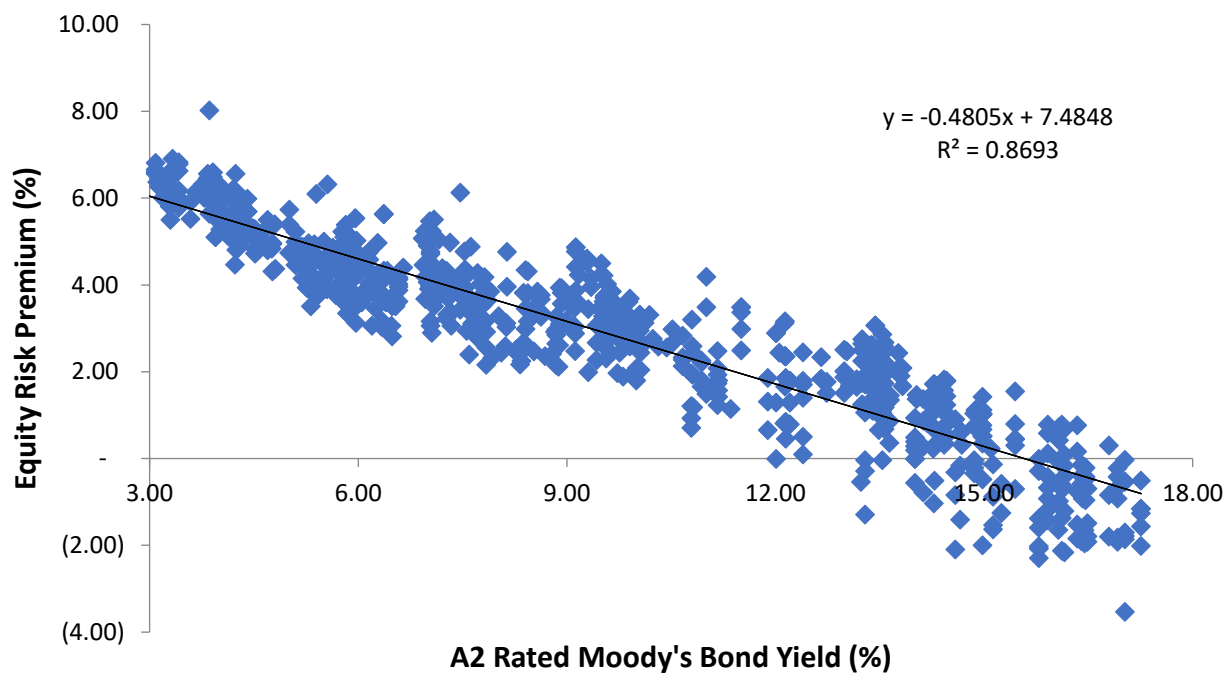
(2) This equity risk premium is based on a regression of the monthly equity risk premiums of the S&P Utility Index relative to Moody's A2 rated public utility bond yields from 1928 - 2024 referenced in note 1 above. Using the equation generated from the regression, an expected equity risk premium is calculated using the prospective A2 rated public utility bond yield of 5.73% (from line 3, page 1 of this Exhibit).

(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 - February 2025.

(4) Using data from Bloomberg, Value Line, and S&P Capital IQ for the S&P Utilities Index, an expected return of 10.73% was derived based on expected dividend yields as a proxy for income returns and long-term growth estimates as a proxy for market appreciation. Subtracting the expected A2 rated public utility bond yield of 5.73%, calculated on line 3 of page 1 of this Exhibit results in an equity risk premium of 5.00%. (10.73% - 5.73% = 5.00%).

(5) Average of lines 1 through 4.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Prediction of Equity Risk Premiums Relative to  
Moody's A2 Rated Utility Bond Yields - Electric Utilities



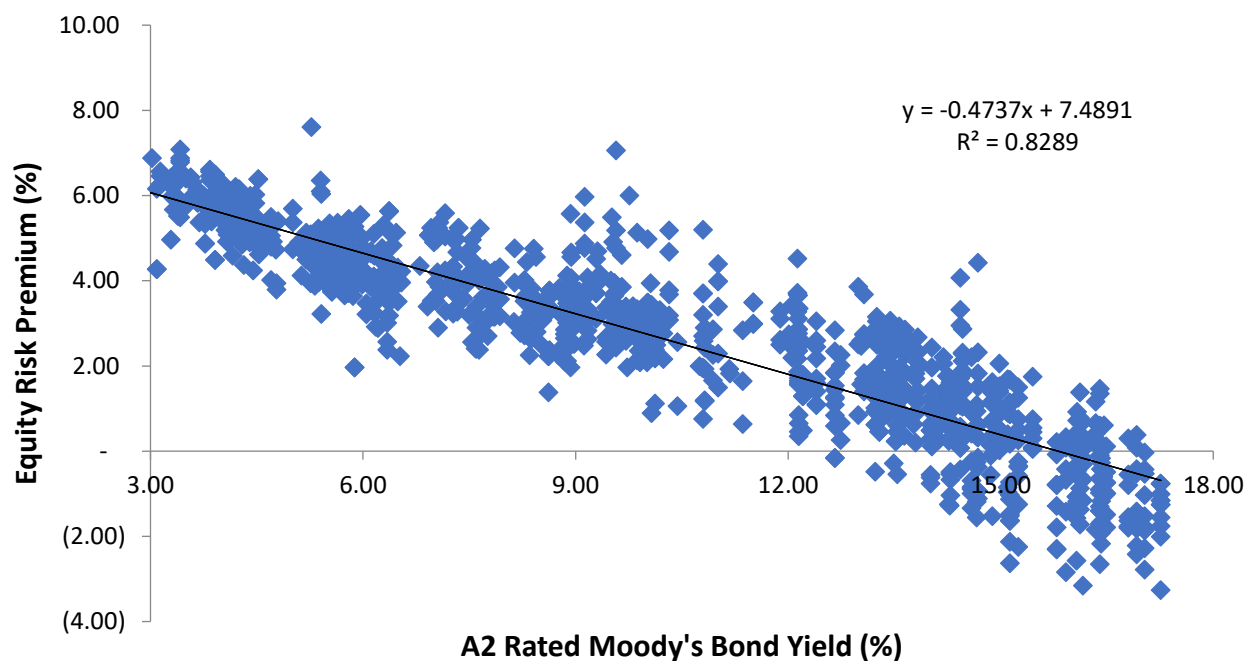
Constant	Slope	Prospective A2 Rated Utility Bond (1)	Equity Risk Premium
7.4848 %	-0.480	5.73 %	4.73 %

Notes:

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

Source of Information: Regulatory Research Associates.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Prediction of Equity Risk Premiums Relative to  
Moody's A2 Rated Utility Bond Yields - Electric Utilities



<u>Constant</u>	<u>Slope</u>	<u>Prospective A2 Rated Utility Bond (1)</u>	<u>Equity Risk Premium</u>
7.4891 %	-0.4737	5.73 %	4.77 %

Notes:

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

Source of Information: Regulatory Research Associates.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Indicated Common Equity Cost Rate Through Use  
of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

Proxy Group of Seven Natural Gas Distribution Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
<u>Proxy Group of Seven Natural Gas Distribution Companies</u>	<u>Value Line Adjusted Beta</u>	<u>Bloomberg Adjusted Beta</u>	<u>Average Beta</u>	<u>Market Risk Premium (1)</u>	<u>Risk-Free Rate (2)</u>	<u>Traditional CAPM Cost Rate</u>	<u>ECAPM Cost Rate</u>	<u>Indicated Common Equity Cost Rate (3)</u>
Atmos Energy Corporation	0.90	0.60	0.75	8.15 %	4.55 %	10.66 %	11.17 %	10.92 %
New Jersey Resources Corporation	1.00	0.60	0.80	8.15	4.55	11.07	11.48	11.27
NiSource Inc.	0.95	0.61	0.78	8.15	4.55	10.91	11.36	11.13
Northwest Natural Holding Company	0.90	0.69	0.80	8.15	4.55	11.07	11.48	11.27
ONE Gas, Inc.	0.85	0.62	0.74	8.15	4.55	10.58	11.11	10.85
Southwest Gas Holding Company	0.95	0.85	0.90	8.15	4.55	11.89	12.09	11.99 (4)
Spire Inc.	0.90	0.65	0.78	8.15	4.55	10.91	11.36	11.13
Mean			0.79			11.01 %	11.44 %	11.10 %
Median			0.78			10.91 %	11.36 %	11.13 %
Average of Mean and Median			0.79			10.96 %	11.40 %	11.12 %

Results Excluding PRPM MRP

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
<u>Results Excluding PRPM MRP</u>	<u>Value Line Adjusted Beta</u>	<u>Bloomberg Adjusted Beta</u>	<u>Average Beta</u>	<u>Market Risk Premium (1)</u>	<u>Risk-Free Rate (2)</u>	<u>Traditional CAPM Cost Rate</u>	<u>ECAPM Cost Rate</u>	<u>Indicated Common Equity Cost Rate (3)</u>
Atmos Energy Corporation	0.90	0.60	0.75	8.14 %	4.55 %	10.66 %	11.17 %	10.91 %
New Jersey Resources Corporation	1.00	0.60	0.80	8.14	4.55	11.06	11.47	11.27
NiSource Inc.	0.95	0.61	0.78	8.14	4.55	10.90	11.35	11.13
Northwest Natural Holding Company	0.90	0.69	0.80	8.14	4.55	11.06	11.47	11.27
ONE Gas, Inc.	0.85	0.62	0.74	8.14	4.55	10.58	11.11	10.84
Southwest Gas Holding Company	0.95	0.85	0.90	8.14	4.55	11.88	12.08	11.98 (4)
Spire Inc.	0.90	0.65	0.78	8.14	4.55	10.90	11.35	11.13
Mean			0.79			11.01 %	11.43 %	11.09 %
Median			0.78			10.90 %	11.35 %	11.13 %
Average of Mean and Median			0.79			10.96 %	11.39 %	11.11 %

Notes on page 3 of this Exhibit.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Indicated Common Equity Cost Rate Through Use  
of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

Proxy Group of Fifteen Electric Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
<u>Proxy Group of Fifteen Electric Companies</u>	<u>Value Line Adjusted Beta</u>	<u>Bloomberg Adjusted Beta</u>	<u>Average Beta</u>	<u>Market Risk Premium (1)</u>	<u>Risk-Free Rate (2)</u>	<u>Traditional CAPM Cost Rate</u>	<u>ECAPM Cost Rate</u>	<u>Indicated Common Equity Cost Rate (3)</u>
Alliant Energy Corporation	0.90	0.54	0.72	8.15 %	4.55 %	10.42 %	10.99 %	10.70 %
Ameren Corporation	0.90	0.52	0.71	8.15	4.55	10.34	10.93	10.63
American Electric Power Corporation	0.85	0.45	0.65	8.15	4.55	9.85	10.56	10.21
Duke Energy Corporation	0.90	0.43	0.66	8.15	4.55	9.93	10.62	10.28
Edison International	1.05	0.66	0.86	8.15	4.55	11.56	11.85	11.70
Entergy Corporation	1.00	0.56	0.78	8.15	4.55	10.91	11.36	11.13
Evergy, Inc.	0.95	0.54	0.75	8.15	4.55	10.66	11.17	10.92
IDACORP, Inc.	0.85	0.51	0.68	8.15	4.55	10.09	10.75	10.42
North Western Corporation	1.00	0.69	0.84	8.15	4.55	11.40	11.72	11.56
OGE Energy Corporation	1.05	0.65	0.85	8.15	4.55	11.48	11.78	11.63
Pinnacle West Capital Corporation	0.95	0.51	0.73	8.15	4.55	10.50	11.05	10.78
Portland General Electric Company	0.95	0.61	0.78	8.15	4.55	10.91	11.36	11.13
Southern Company	0.95	0.45	0.70	8.15	4.55	10.26	10.87	10.56
TXNM Energy, Inc.	0.90	0.42	0.66	8.15	4.55	9.93	10.62	10.28
Xcel Energy Inc.	0.85	0.40	0.62	8.15	4.55	9.60	10.38	9.99
Mean			0.73			10.52 %	11.07 %	10.79 %
Median			0.72			10.42 %	10.99 %	10.70 %
Average of Mean and Median			0.73			10.47 %	11.03 %	10.75 %

Results Excluding PRPM MRP

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
<u>Results Excluding PRPM MRP</u>	<u>Value Line Adjusted Beta</u>	<u>Bloomberg Adjusted Beta</u>	<u>Average Beta</u>	<u>Market Risk Premium (1)</u>	<u>Risk-Free Rate (2)</u>	<u>Traditional CAPM Cost Rate</u>	<u>ECAPM Cost Rate</u>	<u>Indicated Common Equity Cost Rate (3)</u>
Alliant Energy Corporation	0.90	0.54	0.72	8.14 %	4.55 %	10.41 %	10.98 %	10.70 %
Ameren Corporation	0.90	0.52	0.71	8.14	4.55	10.33	10.92	10.63
American Electric Power Corporation	0.85	0.45	0.65	8.14	4.55	9.84	10.56	10.20
Duke Energy Corporation	0.90	0.43	0.66	8.14	4.55	9.92	10.62	10.27
Edison International	1.05	0.66	0.86	8.14	4.55	11.55	11.84	11.70
Entergy Corporation	1.00	0.56	0.78	8.14	4.55	10.90	11.35	11.13
Evergy, Inc.	0.95	0.54	0.75	8.14	4.55	10.66	11.17	10.91
IDACORP, Inc.	0.85	0.51	0.68	8.14	4.55	10.09	10.74	10.41
North Western Corporation	1.00	0.69	0.84	8.14	4.55	11.39	11.72	11.55
OGE Energy Corporation	1.05	0.65	0.85	8.14	4.55	11.47	11.78	11.62
Pinnacle West Capital Corporation	0.95	0.51	0.73	8.14	4.55	10.49	11.04	10.77
Portland General Electric Company	0.95	0.61	0.78	8.14	4.55	10.90	11.35	11.13
Southern Company	0.95	0.45	0.70	8.14	4.55	10.25	10.86	10.56
TXNM Energy, Inc.	0.90	0.42	0.66	8.14	4.55	9.92	10.62	10.27
Xcel Energy Inc.	0.85	0.40	0.62	8.14	4.55	9.60	10.37	9.99
Mean			0.73			10.52 %	11.06 %	10.79 %
Median			0.72			10.41 %	10.98 %	10.70 %
Average of Mean and Median			0.73			10.47 %	11.02 %	10.75 %

Notes on page 3 of this Exhibit.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Notes to Accompany the Application of the CAPM and ECAPM

## Notes:

- (1) The market risk premium (MRP) is derived by using five different measures from four sources: Kroll, Value Line, Bloomberg, and S&P Capital IQ as illustrated below:

**Measure 1: Kroll Arithmetic Mean MRP (1926-2024)**

Arithmetic Mean Monthly Returns for Large Stocks 1926-2024:	12.29 %
Arithmetic Mean Income Returns on Long-Term Government Bonds:	<u>4.99</u>
MRP based on Kroll Historical Data:	<u><u>7.31</u> %</u>

**Measure 2: Application of a Regression Analysis to Kroll Historical Data (1926-2024)**

7.94 %

**Measure 3: Application of the PRPM to Kroll Historical Data (January 1926 - February 2025)**

8.18 %

**Measure 4: Value Line Projected MRP (Thirteen weeks ending February 28, 2025)**

Total projected return on the market 3-5 years hence*:	11.20 %
Risk-Free Rate (see notes 2 and 3):	<u>4.55</u>
MRP based on Value Line Summary & Index:	<u><u>6.65</u> %</u>
*Forecasted 3-5 year capital appreciation plus expected dividend yield	

**Measure 5: Bloomberg, Value Line, and S&P Capital IQ Projected Return on the Market based on the S&P 500**

Total return on the Market based on the S&P 500:	15.23 %
Risk-Free Rate (see notes 2 and 3):	<u>4.55</u>
MRP based on Bloomberg, Value Line, and S&P Capital IQ data	<u><u>10.68</u> %</u>

Average of all MRP Measures: 8.15 %

Average MRP Excluding the PRPM MRP: 8.14 %

- (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 7 and 8 of Exhibit DWD-4.) The projection of the risk-free rate is illustrated below:

First Quarter 2025	4.70 %
Second Quarter 2025	4.70
Third Quarter 2025	4.70
Fourth Quarter 2025	4.60
First Quarter 2026	4.60
Second Quarter 2026	4.60
2026-2030	4.30
2031-2035	<u>4.20</u>
	<u><u>4.55</u> %</u>

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

## Sources of Information:

Value Line Summary and Index  
Blue Chip Financial Forecasts, November 27, 2024 and February 28, 2025  
Kroll Cost of Capital Navigator  
S&P Capital IQ  
Bloomberg Professional Services

Kentucky Utilities Company / Louisville Gas & Electric Company  
Basis of Selection of the Group of Non-Price Regulated Companies  
Comparable in Total Risk to the Proxy Group of Seven Natural Gas Distribution Companies

The criteria for selection of the proxy group of non-price regulated companies comparable in total risk to the proxy group of seven natural gas distribution companies 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 0.64 - 0.92 and residual standard error of the regression range of 2.8368 - 3.3832 of the proxy group of seven natural gas distribution companies.

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 proxy group of seven natural gas distribution companies' residual standard error of the regression is 0.1366. The standard deviation of the standard error of the Standard Deviation of the Std. Err. of the Regr. =  $\frac{\sqrt{2N}}{\text{Standard Error of the Regression}}$

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

Thus,  $0.1366 = \frac{3.1100}{\sqrt{518}} = \frac{22.7596}{3.1100}$

Source of Information: Value Line Proprietary Database, December 2024.  
Value Line Investment Survey (Standard Edition).

Kentucky Utilities Company / Louisville Gas & Electric Company  
Basis of Selection of the Group of Non-Price Regulated Companies  
Comparable in Total Risk to the Proxy Group of Fifteen Electric Companies

The criteria for selection of the proxy group of non-price regulated companies comparable in total risk to the proxy group of fifteen electric companies 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 0.71 - 0.97 and residual standard error of the regression range of 2.6065 - 3.1089 of the proxy group of fifteen electric companies.

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 proxy group of fifteen electric companies' residual standard error of the regression is 0.1256. The standard deviation of the standard error of the regression is

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

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

$$\text{Thus, } 0.1256 = \frac{2.8577}{\sqrt{518}} = \frac{2.8577}{22.7596}$$

Source of Information: Value Line Proprietary Database, December 2024.  
Value Line Investment Survey (Standard Edition).

Kentucky Utilities Company / Louisville Gas & Electric Company  
Basis of Selection of Comparable Risk  
Domestic Non-Price Regulated Companies

	[1]	[2]	[3]	[4]
Proxy Group of Seven Natural Gas Distribution Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Atmos Energy Corporation	0.85	0.75	2.8989	0.0647
New Jersey Resources Corporation	0.95	0.91	3.0464	0.0680
NiSource Inc.	0.90	0.83	2.6470	0.0591
Northwest Natural Holding Company	0.85	0.71	3.3761	0.0754
ONE Gas, Inc.	0.85	0.71	3.2540	0.0726
Southwest Gas Holding Company	0.90	0.80	3.4852	0.0778
Spire Inc.	0.85	0.74	3.0953	0.0691
Average	0.88	0.78	3.1100	0.0700
Beta Range (+/- 2 std. Devs. of Beta) 2 std. Devs. of Beta	0.64 0.14	0.92		
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.8368	3.3832		
Std. dev. of the Res. Std. Err.	0.1366			
2 std. dev. of the Res. Std. Err.	0.2732			
	[1]	[2]	[3]	[4]
Proxy Group of Fifteen Electric Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Alliant Energy Corporation	0.90	0.79	2.8682	0.0640
Ameren Corporation	0.90	0.78	2.7253	0.0608
American Electric Power Corporation	0.80	0.68	2.8069	0.0627
Duke Energy Corporation	0.90	0.80	2.8177	0.0629
Edison International	1.00	0.96	3.0475	0.0680
Entergy Corporation	0.95	0.91	2.8593	0.0638
Eversource, Inc.	0.95	0.88	2.9738	0.0664
IDACORP, Inc.	0.85	0.71	2.7358	0.0611
North Western Corporation	0.95	0.89	2.8815	0.0643
OGE Energy Corporation	1.05	1.05	2.8365	0.0633
Pinnacle West Capital Corporation	0.95	0.88	3.0813	0.0688
Portland General Electric Company	0.90	0.83	2.9422	0.0657
Southern Company	0.95	0.87	2.7873	0.0622
TXNM Energy, Inc.	0.90	0.78	2.6718	0.0596
Xcel Energy Inc.	0.85	0.73	2.8298	0.0632
Average	0.92	0.84	2.8577	0.0638
Beta Range (+/- 2 std. Devs. of Beta) 2 std. Devs. of Beta	0.71 0.13	0.97		
Residual Std. Err. Range (+/- 2 std. Devs. of the Residual Std. Err.)	2.6065	3.1089		
Std. dev. of the Res. Std. Err.	0.1256			
2 std. dev. of the Res. Std. Err.	0.2512			

Source of Information: Value Line Proprietary Database, December 2024.

Kentucky Utilities Company / Louisville Gas & Electric Company

Proxy Group of Non-Price Regulated Companies

Comparable in Total Risk to the

Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

	[1]	[2]	[3]	[4]
Proxy Group of Forty-Nine Non-Price Regulated Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
Abbott Labs.	0.90	0.79	2.9573	0.0660
AbbVie Inc.	0.85	0.70	3.1365	0.0700
Air Products & Chem.	0.90	0.83	3.0324	0.0677
Alphabet Inc.	0.90	0.81	3.1907	0.0712
Altria Group	0.85	0.76	2.8948	0.0646
Apple Inc.	0.95	0.91	3.2127	0.0717
Assurant Inc.	0.90	0.79	3.0394	0.0679
AutoZone Inc.	0.95	0.88	3.2399	0.0723
Booz Allen Hamilton	0.85	0.74	3.2930	0.0735
Brady Corp.	0.95	0.90	2.8860	0.0644
BWX Technologies	0.80	0.68	3.2662	0.0729
CACI Int'l	0.90	0.80	3.0359	0.0678
Casey's Gen'l Stores	0.90	0.79	3.1661	0.0707
Cencora	0.80	0.66	2.9646	0.0662
CSW Industrials	0.90	0.77	3.2779	0.0732
CVS Health	0.90	0.79	3.3646	0.0751
Danaher Corp.	0.90	0.81	3.0286	0.0676
Dolby Labs.	0.95	0.87	2.9508	0.0659
Exponent, Inc.	0.95	0.88	3.3456	0.0747
Fastenal Co.	0.90	0.80	2.9253	0.0653
Franklin Electric	0.90	0.82	2.9333	0.0655
GATX Corp.	0.95	0.90	2.9875	0.0667
Henry (Jack) & Assoc	0.85	0.74	3.1928	0.0713
Hunt (J.B.)	0.95	0.91	3.2647	0.0729
Huntington Ingalls	0.95	0.89	3.3736	0.0753
L3Harris Technologie	0.90	0.83	3.1556	0.0711
Landstar System	0.80	0.65	2.8665	0.0640
Lockheed Martin	0.85	0.75	2.8741	0.0642
McKesson Corp.	0.85	0.70	3.1485	0.0703
Microsoft Corp.	0.90	0.78	2.8520	0.0637
MSC Industrial Direc	0.90	0.84	2.9545	0.0660
Oracle Corp.	0.85	0.70	3.0995	0.0692
O'Reilly Automotive	0.90	0.84	3.0259	0.0676
OSI Systems	0.90	0.81	3.2160	0.0718
Packaging Corp.	0.95	0.85	2.8607	0.0639
Pfizer, Inc.	0.80	0.67	3.1709	0.0708
Philip Morris Int'l	0.95	0.87	2.8750	0.0642
Prestige Consumer	0.85	0.75	3.3470	0.0747
Selective Ins. Group	0.85	0.74	2.9941	0.0668
Service Corp. Int'l	0.90	0.84	3.1842	0.0711
Sherwin-Williams	0.95	0.90	2.9254	0.0653
Smith (A.O.)	0.90	0.79	3.0828	0.0688
Thermo Fisher Sci.	0.85	0.77	2.8565	0.0638
UniFirst Corp.	0.90	0.81	3.0115	0.0672
UnitedHealth Group	0.95	0.90	3.1445	0.0702
Universal Corp.	0.80	0.68	3.2233	0.0720
VeriSign Inc.	0.90	0.80	2.8857	0.0644
Waters Corp.	0.95	0.86	3.2280	0.0721
Watsco, Inc.	0.85	0.76	3.1218	0.0697
Average	0.89	0.80	3.0829	0.0688
Proxy Group of Seven Natural Gas Distribution Companies	0.88	0.78	3.1100	0.0700

Source of Information:

Value Line Proprietary Database, December 2024.

Kentucky Utilities Company / Louisville Gas & Electric Company

Proxy Group of Non-Price Regulated Companies

Comparable in Total Risk to the

Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

	[1]	[2]	[3]	[4]
Proxy Group of Forty-Seven Non-Price Regulated Companies	Value Line Adjusted Beta	Unadjusted Beta	Residual Standard Error of the Regression	Standard Deviation of Beta
3M Company	0.95	0.90	2.8096	0.0627
Abbott Laboratories	0.90	0.79	2.9573	0.0660
Agilent Technologies, Inc.	0.95	0.86	2.8368	0.0633
Air Products and Chemicals, Inc.	0.90	0.83	3.0324	0.0677
Allstate Corporation	1.00	0.94	2.7930	0.0624
Altria Group, Inc.	0.85	0.76	2.8948	0.0646
Analog Devices, Inc.	1.00	0.95	2.8971	0.0647
Archer-Daniels-Midland Company	0.95	0.89	2.7243	0.0608
Assurant, Inc.	0.90	0.79	3.0394	0.0679
Brady Corporation	0.95	0.90	2.8860	0.0644
Broadridge Financial Solutions, Inc.	0.90	0.82	2.7633	0.0617
Brown & Brown, Inc.	0.95	0.91	2.6119	0.0583
Brown-Forman Corporation 'B'	0.90	0.80	2.7338	0.0610
CACI International Inc	0.90	0.80	3.0359	0.0678
Cisco Systems, Inc.	0.85	0.75	2.8343	0.0633
Danaher Corporation	0.90	0.81	3.0286	0.0676
Dolby Laboratories, Inc.	0.95	0.87	2.9508	0.0659
Expeditors International	0.95	0.91	2.6741	0.0597
FactSet Research Systems Inc.	1.00	0.95	2.7486	0.0614
Fastenal Company	0.90	0.80	2.9253	0.0653
Federal Signal Corporation	0.95	0.91	2.7333	0.0610
Franklin Electric Co., Inc.	0.90	0.82	2.9333	0.0655
GATX Corporation	0.95	0.90	2.9875	0.0667
Gentex Corporation	1.00	0.93	2.6082	0.0582
Home Depot, Inc.	0.95	0.90	2.6215	0.0585
Ingredion, Inc.	0.90	0.79	2.6281	0.0587
Innospec Inc.	1.00	0.94	3.0243	0.0675
International Business Machines Corporation	0.90	0.85	2.6691	0.0596
Juniper Networks, Inc.	1.00	0.93	2.8368	0.0633
Lockheed Martin Corporation	0.85	0.75	2.8741	0.0642
Microsoft Corporation	0.90	0.78	2.8520	0.0637
Motorola Solutions, Inc.	0.95	0.85	2.7315	0.0610
MSA Safety, Inc.	0.95	0.92	3.0893	0.0690
MSC Industrial Direct Co., Inc.	0.90	0.84	2.9545	0.0660
O'Reilly Automotive, Inc.	0.90	0.84	3.0259	0.0676
Packaging Corporation of America	0.95	0.85	2.8607	0.0639
Philip Morris International Inc.	0.95	0.87	2.8750	0.0642
Selective Insurance Group, Inc.	0.85	0.74	2.9941	0.0668
Sensient Technologies Corporation	0.90	0.85	2.8202	0.0630
Sherwin-Williams Company	0.95	0.90	2.9254	0.0653
Smith Corporation (A.O.)	0.90	0.79	3.0828	0.0688
Texas Instruments Incorporated	0.85	0.77	2.7711	0.0619
Thermo Fisher Scientific Inc.	0.85	0.77	2.8565	0.0638
UniFirst Corporation	0.90	0.81	3.0115	0.0672
VeriSign, Inc.	0.90	0.80	2.8857	0.0644
Verisk Analytics, Inc.	0.90	0.78	2.7553	0.0615
Zoetis, Inc.	1.00	0.96	2.8162	0.0629
Average	0.92	0.85	2.8596	0.0638
Proxy Group of Fifteen Electric Companies	0.92	0.84	2.8577	0.0638

Source of Information:

Value Line Proprietary Database, December 2024.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Summary of Cost of Equity Models Applied to  
Proxy Group of Non-Price Regulated Companies  
Comparable in Total Risk to the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Principal Methods	Proxy Group of Forty- Nine Non-Price Regulated Companies	Proxy Group of Forty- Nine Non-Price Regulated Companies (excl. PRPM)	Proxy Group of Forty- Seven Non-Price Regulated Companies	Proxy Group of Forty- Seven Non-Price Regulated Companies (excl. PRPM)
Discounted Cash Flow Model (DCF) (1)	11.87 %	11.87 %	11.17 %	11.17 %
Risk Premium Model (RPM) (2)	12.27	12.24	12.29	12.26
Capital Asset Pricing Model (CAPM) (3)	11.75	11.74	11.89	11.88
Mean	11.96 %	11.95 %	11.78 %	11.77 %
Median	11.87 %	11.87 %	11.89 %	11.88 %
Average of Mean and Median	11.92 %	11.91 %	11.84 %	11.83 %

Notes:

- (1) From pages 2-3 of this Exhibit.
- (2) From page 4 of this Exhibit.
- (3) From pages 8-11 of this Exhibit.

Kentucky Utilities Company / Louisville Gas & Electric Company

DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Seven Natural Gas Distribution CompaniesProxy Group of Forty-Nine Non-Price Regulated Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Forty-Nine Non-Price Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	S&P Capital IQ Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS (1)	Adjusted Dividend Yield	Indicated Common Equity Cost Rate (2)
Abbott Labs.	1.94 %	4.50 %	10.40 %	9.57 %	8.16 %	2.02 %	10.18 %
AbbVie Inc.	3.59	4.00	10.20	11.68	8.63	3.74	12.37
Air Products & Chem.	2.30	10.50	7.90	10.34	9.58	2.41	11.99
Alphabet Inc.	0.42	13.50	15.60	16.59	15.23	0.45	15.68
Altria Group	7.64	6.00	3.50	4.31	4.60	7.82	12.42
Apple Inc.	0.41	9.00	13.80	9.53	10.78	0.43	11.21
Assurant Inc.	1.51	9.50	NA	NA	9.50	1.58	11.08
AutoZone Inc.	-	11.50	11.80	12.73	12.01	-	NA
Booz Allen Hamilton	1.69	10.50	14.00	13.50	12.67	1.80	14.47
Brady Corp.	1.29	15.50	NA	11.00	13.25	1.38	14.63
BWX Technologies	0.87	9.00	10.10	10.92	10.01	0.91	10.92
CACI Int'l	-	4.50	14.10	14.08	10.89	-	NA
Casey's Gen'l Stores	0.48	12.00	12.60	12.53	12.38	0.51	12.89
Cencora	0.91	6.50	12.10	11.70	10.10	0.96	11.06
CSW Industrials	0.27	13.50	NA	12.50	13.00	0.29	13.29
CVS Health	4.93	0.50	11.30	23.31	11.70	5.22	16.92
Danaher Corp.	0.57	2.00	10.20	9.43	7.21	0.59	7.80
Dolby Labs.	1.64	9.50	NA	NA	9.50	1.72	11.22
Exponent, Inc.	1.32	7.50	NA	NA	7.50	1.37	8.87
Fastenal Co.	2.28	9.00	9.80	9.26	9.35	2.39	11.74
Franklin Electric	1.05	7.50	12.00	12.00	10.50	1.11	11.61
GATX Corp.	1.52	10.50	NA	NA	10.50	1.60	12.10
Henry (Jack) & Assoc	1.33	6.50	8.60	8.63	7.91	1.38	9.29
Hunt (J.B.)	1.02	6.00	16.40	12.48	11.63	1.08	12.71
Huntington Ingalls	2.88	10.00	11.10	11.08	10.73	3.03	13.76
L3Harris Technologie	2.25	9.00	7.30	7.88	8.06	2.34	10.40
Landstar System	0.84	6.00	NA	11.00	8.50	0.88	9.38
Lockheed Martin	2.78	12.00	7.80	6.45	8.75	2.90	11.65
McKesson Corp.	0.48	10.00	14.30	14.04	12.78	0.51	13.29
Microsoft Corp.	0.78	14.50	14.40	12.97	13.96	0.83	14.79
MSC Industrial Direc	4.21	0.50	NA	NA	0.50	4.22	4.72 (3)
Oracle Corp.	0.93	10.00	10.20	11.22	10.47	0.98	11.45
O'Reilly Automotive	-	10.50	12.80	12.12	11.81	-	NA
OSI Systems	-	10.50	12.90	14.05	12.48	-	NA
Packaging Corp.	2.21	9.00	8.30	11.31	9.54	2.32	11.86
Pfizer, Inc.	6.57	2.50	13.80	2.56	6.29	6.78	13.07
Philip Morris Int'l	4.09	5.00	8.20	9.87	7.69	4.25	11.94
Prestige Consumer	-	5.50	7.00	7.67	6.72	-	NA
Selective Ins. Group	1.68	10.50	NA	16.40	13.45	1.79	15.24
Service Corp. Int'l	1.59	4.50	10.80	10.77	8.69	1.66	10.35
Sherwin-Williams	0.89	12.00	9.80	9.56	10.45	0.94	11.39
Smith (A.O.)	1.97	9.00	12.00	12.00	11.00	2.08	13.08
Thermo Fisher Sci.	0.32	6.00	7.70	9.55	7.75	0.33	8.08
UniFirst Corp.	0.68	8.50	NA	NA	8.50	0.71	9.21
UnitedHealth Group	1.61	11.00	12.40	15.03	12.81	1.71	14.52
Universal Corp.	6.04	13.50	NA	NA	13.50	6.45	19.95 (3)
VeriSign Inc.	-	12.00	NA	NA	12.00	-	NA
Waters Corp.	-	6.50	7.80	8.29	7.53	-	NA
Watsco, Inc.	2.19	7.00	NA	NA	7.00	2.27	9.27
NA = Not Available						Mean	11.93 %
						Median	11.80 %
						Average of Mean and Median	11.87 %

## Notes:

- (1) Average of columns 2 through 5 excluding negative growth rates and extreme positive values.
- (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 02/28/2025. 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 S&P Capital IQ (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 02/28/2025  
 S&P Capital IQ

Kentucky Utilities Company / Louisville Gas & Electric Company

DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Seven Natural Gas Distribution CompaniesProxy Group of Forty-Nine Non-Price Regulated Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Forty-Seven Non-Price Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Zack's Five Year Projected Growth Rate in EPS	S&P Capital IQ 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	2.08 %	31.00 %	5.80 %	(6.19) %	18.40 %	2.27 %	20.67 % (3)
Abbott Laboratories	1.94	4.50	10.40	9.57	8.16	2.02	10.18
Agilent Technologies, Inc.	0.71	6.50	6.60	7.56	6.89	0.73	7.62
Air Products and Chemicals, Inc.	2.30	10.50	7.90	10.34	9.58	2.41	11.99
Allstate Corporation	2.08	29.00	9.80	NMF	19.40	2.28	21.68 (3)
Altria Group, Inc.	7.64	6.00	3.50	4.31	4.60	7.82	12.42
Analog Devices, Inc.	1.82	9.00	12.00	16.87	12.62	1.93	14.55
Archer-Daniels-Midland Company	4.10	3.00	7.30	7.27	5.86	4.22	10.08
Assurant, Inc.	1.51	9.50	NA	NA	9.50	1.58	11.08
Brady Corporation	1.29	15.50	NA	11.00	13.25	1.38	14.63
Broadridge Financial Solutions, Inc.	1.51	9.50	NA	NA	9.50	1.58	11.08
Brown & Brown, Inc.	0.56	12.50	9.10	10.06	10.55	0.59	11.14
Brown-Forman Corporation 'B'	2.50	14.00	3.20	0.17	5.79	2.57	8.36
CACI International Inc	-	4.50	14.10	14.08	10.89	-	NA
Cisco Systems, Inc.	2.70	3.50	5.10	4.47	4.36	2.76	7.12
Danaher Corporation	0.57	2.00	10.20	9.43	7.21	0.59	7.80
Dolby Laboratories, Inc.	1.64	9.50	NA	NA	9.50	1.72	11.22
Expeditors International	1.28	(0.50)	4.30	10.18	7.24	1.33	8.57
FactSet Research Systems Inc.	0.88	9.00	9.20	9.86	9.35	0.92	10.27
Fastenal Company	2.28	9.00	9.80	9.26	9.35	2.39	11.74
Federal Signal Corporation	0.59	13.50	14.00	12.00	13.17	0.63	13.80
Franklin Electric Co., Inc.	1.05	7.50	12.00	12.00	10.50	1.11	11.61
GATX Corporation	1.52	10.50	NA	NA	10.50	1.60	12.10
Gentex Corporation	1.75	12.50	14.30	14.33	13.71	1.87	15.58
Home Depot, Inc.	2.27	6.50	7.10	4.04	5.88	2.34	8.22
Ingredion, Inc.	2.36	9.50	11.00	11.00	10.50	2.48	12.98
Innospec Inc.	1.42	7.50	NA	7.50	7.50	1.47	8.97
International Business Machines Corporation	2.82	3.00	4.20	7.49	4.90	2.89	7.79
Juniper Networks, Inc.	2.38	6.50	12.40	16.12	11.67	2.52	14.19
Lockheed Martin Corporation	2.78	12.00	7.80	6.45	8.75	2.90	11.65
Microsoft Corporation	0.78	14.50	14.40	12.97	13.96	0.83	14.79
Motorola Solutions, Inc.	0.94	10.00	8.40	7.39	8.60	0.98	9.58
MSA Safety, Inc.	1.23	8.00	NA	NA	8.00	1.28	9.28
MSC Industrial Direct Co., Inc.	4.21	0.50	NA	NA	0.50	4.22	4.72 (3)
O'Reilly Automotive, Inc.	-	10.50	12.80	12.12	11.81	-	NA
Packaging Corporation of America	2.21	9.00	8.30	11.31	9.54	2.32	11.86
Philip Morris International Inc.	4.09	5.00	8.20	9.87	7.69	4.25	11.94
Selective Insurance Group, Inc.	1.68	10.50	NA	16.40	13.45	1.79	15.24
Sensient Technologies Corporation	2.22	2.50	NA	14.00	8.25	2.31	10.56
Sherwin-Williams Company	0.89	12.00	9.80	9.56	10.45	0.94	11.39
Smith Corporation (A.O.)	1.97	9.00	12.00	12.00	11.00	2.08	13.08
Texas Instruments Incorporated	2.86	3.00	11.60	10.95	8.52	2.98	11.50
Thermo Fisher Scientific Inc.	0.32	6.00	7.70	9.55	7.75	0.33	8.08
UniFirst Corporation	0.68	8.50	NA	NA	8.50	0.71	9.21
VeriSign, Inc.	-	12.00	NA	NA	12.00	-	NA
Verisk Analytics, Inc.	0.63	11.00	12.00	11.98	11.66	0.67	12.33
Zoetis, Inc.	1.19	7.50	9.30	9.24	8.68	1.24	9.92
NA = Not Available						Mean	11.11 %
						Median	11.22 %
						Average of Mean and Median	11.17 %

## Notes:

- (1) Average of columns 2 through 5 excluding negative growth rates and extreme positive values.
- (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 02/28/2025. 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 S&P Capital IQ (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 02/28/2025  
S&P Capital IQ

Kentucky Utilities Company / Louisville Gas & Electric Company  
Indicated Common Equity Cost Rate  
Through Use of a Risk Premium Model  
Using an Adjusted Total Market Approach

Line No.		Proxy Group of Forty-Nine Non- Price Regulated Companies	Proxy Group of Forty-Nine Non- Price Regulated Companies(excl. PRPM)	Proxy Group of Forty-Seven Non- Price Regulated Companies	Proxy Group of Forty-Seven Non- Price Regulated Companies(excl. PRPM)
1.	Prospective Yield on Baa2 Rated Corporate Bonds (1)	6.14 %	6.14 %	6.14 %	6.14 %
2.	Adjustment to Reflect Bond rating Difference of Non-Price Regulated Companies (2)	(0.14)	(0.14)	(0.18)	(0.18)
3.	Adjusted Bond Yield	6.01	6.01	5.96	5.96
4.	Equity Risk Premium (3)	6.26	6.23	6.33	6.3
5.	Risk Premium Derived Common Equity Cost Rate	12.27 %	12.24 %	12.29 %	12.26 %

Notes: (1) Average forecast of Baa corporate bonds based upon the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated November 27, 2024 and February 28, 2025 (see pages 7 and 8 of Exhibit DWD-4). The estimates are detailed below.

First Quarter 2025	6.20 %
Second Quarter 2025	6.20
Third Quarter 2025	6.20
Fourth Quarter 2025	6.20
First Quarter 2026	6.20
Second Quarter 2026	6.20
2026-2030	6.00
2031-2035	5.90
Average	6.14 %

(2) The average yield spread of Baa2 rated corporate bonds over A2 corporate bonds for the three months ending February 2025. To reflect the A3/Baa1 average rating of the Proxy Group of Forty-Nine Non-Price Regulated Companies, the yield on the Baa corporate bond must be adjusted by one-half the spread between A2 and Baa2 corporate bond yields. Further, to reflect the A3 average rating of the Proxy Group of Forty-Seven Non-Price Regulated Companies, the yield on the Baa corporate bond must be adjusted by two-thirds the spread between A2 and Baa2 corporate bond yields, both shown below:

	A2 Corp. Bond Yield	Baa2 Corp. Bond Yield	Spread
Feb-25	5.66 %	5.92 %	0.26 %
Jan-25	5.80	6.08	0.28
Dec-24	5.53	5.80	0.27
		Average yield spread	0.27
		1/2 of spread	0.14
		2/3 of spread	0.18

(3) From page 7 of this Exhibit.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Comparison of Long-Term Issuer Ratings for the  
Proxy Group of Forty-Nine Non-Price Regulated Companies and Proxy Group of Forty-Seven Non-Price Regulated Companies

Proxy Group of Forty-Nine Non-Price Regulated Companies	Moody's Long-Term Issuer Rating February 2025		Standard & Poor's Long-Term Issuer Rating February 2025	
	Long-Term Issuer Rating	Numerical Weighting (1)	Long-Term Issuer Rating	Numerical Weighting (1)
Abbott Labs.	Aa3	4.0	AA-	4.0
AbbVie Inc.	A3	7.0	A-	7.0
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
Apple Inc.	Aaa	1.0	AA+	2.0
Assurant Inc.	Baa2	9.0	BBB	9.0
AutoZone Inc.	Baa1	8.0	BBB	9.0
Booz Allen Hamilton	NA	--	NA	--
Brady Corp.	NA	--	NA	--
BWX Technologies	Ba2	12.0	BB	12.0
CACI Int'l	NA	--	BB+	11.0
Casey's Gen'l Stores	NA	--	NA	--
Cencora	Baa2	9.0	BBB+	8.0
CSW Industrials	NA	--	NA	--
CVS Health	Baa3	10.0	BBB	9.0
Danaher Corp.	A3	7.0	A-	7.0
Dolby Labs.	NA	--	NA	--
Exponent, Inc.	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
Huntington Ingalls	Baa3	10.0	BBB-	10.0
L3Harris Technologie	Baa2	9.0	BBB	9.0
Landstar System	NA	--	NA	--
Lockheed Martin	A2	6.0	A-	7.0
McKesson Corp.	A3	7.0	BBB+	8.0
Microsoft Corp.	Aaa	1.0	AAA	1.0
MSC Industrial Direc	NA	--	NA	--
Oracle Corp.	Baa2	9.0	BBB	9.0
O'Reilly Automotive	Baa1	8.0	BBB	9.0
OSI Systems	NA	--	NA	--
Packaging Corp.	Baa2	9.0	BBB	9.0
Pfizer, Inc.	A2	6.0	A	6.0
Philip Morris Int'l	A2	6.0	A-	7.0
Prestige Consumer	NA	--	BB	12.0
Selective Ins. Group	Baa2	9.0	BBB	9.0
Service Corp. Int'l	Ba3	13.0	BB+	11.0
Sherwin-Williams	Baa2	9.0	BBB	9.0
Smith (A.O.)	NA	--	NA	--
Thermo Fisher Sci.	A3	7.0	A-	7.0
UniFirst Corp.	NA	--	NA	--
UnitedHealth Group	A2	6.0	A+	5.0
Universal Corp.	WR	--	BBB-	10.0
VeriSign Inc.	Baa3	10.0	BBB	9.0
Waters Corp.	NA	--	NA	--
Watsco, Inc.	NA	--	NA	--
Natural Gas CEM Proxy Group Average	A3/Baa1	7.5	BBB+	7.8
Louisville Gas & Electric Company	A3	7.0	A-	7.0

Notes:  
(1) From page 4 of Exhibit DWD-4.

Source of Information:  
Bloomberg Professional Services.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Comparison of Long-Term Issuer Ratings for the  
Proxy Group of Forty-Nine Non-Price Regulated Companies and Proxy Group of Forty-Seven Non-Price Regulated Companies

Proxy Group of Forty-Seven Non-Price Regulated Companies	Moody's Long-Term Issuer Rating February 2025		Standard & Poor's Long-Term Issuer Rating February 2025	
	Long-Term Issuer Rating	Numerical Weighting (1)	Long-Term Issuer Rating	Numerical Weighting (1)
3M Company	A3	7.0	BBB+	8.0
Abbott Laboratories	Aa3	4.0	AA-	4.0
Agilent Technologies, Inc.	Baa1	8.0	BBB+	8.0
Air Products and Chemicals, Inc.	A2	6.0	A	6.0
Allstate Corporation	A3	7.0	BBB+	8.0
Altria Group, Inc.	A3	7.0	BBB	9.0
Analog Devices, Inc.	A2	6.0	A-	7.0
Archer-Daniels-Midland Company	A2	6.0	A	6.0
Assurant, Inc.	Baa2	9.0	BBB	9.0
Brady Corporation	NA	--	NA	--
Broadridge Financial Solutions, Inc.	Baa2	9.0	BBB	9.0
Brown & Brown, Inc.	Baa3	10.0	BBB-	10.0
Brown-Forman Corporation 'B'	A1	5.0	A-	7.0
CACI International Inc	NA	--	BB+	11.0
Cisco Systems, Inc.	A1	5.0	AA-	4.0
Danaher Corporation	A3	7.0	A-	7.0
Dolby Laboratories, Inc.	NA	--	NA	--
Expeditors International	NA	--	NA	--
FactSet Research Systems Inc.	Baa3	10.0	NA	--
Fastenal Company	NA	--	NA	--
Federal Signal Corporation	NA	--	NA	--
Franklin Electric Co., Inc.	NA	--	NA	--
GATX Corporation	Baa2	9.0	BBB	9.0
Gentex Corporation	NA	--	NA	--
Home Depot, Inc.	A2	6.0	A	6.0
Ingredion, Inc.	Baa1	8.0	BBB	9.0
Innospec Inc.	NA	--	NR	--
International Business Machines Corporation	A3	7.0	A-	7.0
Juniper Networks, Inc.	Baa2	9.0	BBB	9.0
Lockheed Martin Corporation	A2	6.0	A-	7.0
Microsoft Corporation	Aaa	1.0	AAA	1.0
Motorola Solutions, Inc.	Baa2	9.0	BBB	9.0
MSA Safety, Inc.	NA	--	NA	--
MSC Industrial Direct Co., Inc.	NA	--	NA	--
O'Reilly Automotive, Inc.	Baa1	8.0	BBB	9.0
Packaging Corporation of America	Baa2	9.0	BBB	9.0
Philip Morris International Inc.	A2	6.0	A-	7.0
Selective Insurance Group, Inc.	Baa2	9.0	BBB	9.0
Sensient Technologies Corporation	WR	--	NR	--
Sherwin-Williams Company	Baa2	9.0	BBB	9.0
Smith Corporation (A.O.)	NA	--	NA	--
Texas Instruments Incorporated	Aa3	4.0	A+	5.0
Thermo Fisher Scientific Inc.	A3	7.0	A-	7.0
UniFirst Corporation	NA	--	NA	--
VeriSign, Inc.	Baa3	10.0	BBB	9.0
Verisk Analytics, Inc.	Baa1	8.0	BBB	9.0
Zoetis, Inc.	A3	7.0	BBB	9.0
Electric CEM Proxy Group Average	A3	7.2	BBB+	7.6
Kentucky Utilities Company	A3	7.0	A-	7.0
Louisville Gas & Electric Company	A3	7.0	A-	7.0

Notes:  
(1) From page 4 of Exhibit DWD-4.

Source of Information:  
Bloomberg Professional Services.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Derivation of Equity Risk Premium Based on the Total Market Approach  
Using the Beta for  
Non-Price Regulated Companies of Comparable risk to the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Line No.	Equity Risk Premium Measure	Proxy Group of Forty- Nine Non-Price Regulated Companies	Proxy Group of Forty- Nine Non-Price Regulated Companies(excl. PRPM)	Proxy Group of Forty- Seven Non-Price Regulated Companies	Proxy Group of Forty- Seven Non-Price Regulated Companies(excl. PRPM)
1.	Kroll Equity Risk Premium (1)	6.10 %	6.10 %	6.10 %	6.10 %
2.	Regression on Kroll Risk Premium Data (2)	6.82	6.82	6.82	6.82
3.	Kroll Equity Risk Premium based on PRPM (3)	7.32	NA	7.32	NA
4.	Equity Risk Premium Based on Value Line Summary and Index (4)	5.85	5.85	5.85	5.85
5.	Equity Risk Premium Based on Bloomberg, Value Line, and S&P Global Market Intelligence S&P 500 Companies (5)	9.88	9.88	9.88	9.88
6.	Conclusion of Equity Risk Premium	7.19 %	7.16 %	7.19 %	7.16 %
7.	Adjusted Beta (6)	0.87	0.87	0.88	0.88
8.	Forecasted Equity Risk Premium	6.26 %	6.23 %	6.33 %	6.30 %

Notes:

- (1) From note 1 of page 6 of Exhibit DWD-4.
- (2) From note 2 of page 6 of Exhibit DWD-4.
- (3) From note 3 of page 6 of Exhibit DWD-4.
- (4) From note 4 of page 6 of Exhibit DWD-4.
- (5) From note 5 of page 6 of Exhibit DWD-4.
- (6) Average of mean and median beta from pages 8-9 of this Exhibit.

Sources of Information:

Kroll Cost of Capital Navigator  
Value Line Summary and Index.  
Blue Chip Financial Forecasts, November 27, 2024 and February 28, 2025  
Bloomberg Professional Services.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Traditional CAPM and ECAPM Results for the Proxy Groups of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Proxy Group of Forty-Nine Non-Price Regulated Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Forty-Nine 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)
Abbott Labs.	0.85	0.62	0.73	8.15 %	4.55 %	10.50 %	11.05 %	10.78 %
AbbVie Inc.	0.80	0.49	0.65	8.15	4.55	9.85	10.56	10.21
Air Products & Chem.	0.90	0.89	0.89	8.15	4.55	11.80	12.03	11.92
Alphabet Inc.	0.90	0.98	0.94	8.15	4.55	12.21	12.33	12.27
Altria Group	0.85	0.46	0.66	8.15	4.55	9.93	10.62	10.28
Apple Inc.	0.95	0.93	0.94	8.15	4.55	12.21	12.33	12.27
Assurant Inc.	0.90	0.79	0.84	8.15	4.55	11.40	11.72	11.56
AutoZone Inc.	0.90	0.69	0.80	8.15	4.55	11.07	11.48	11.27
Booz Allen Hamilton	0.90	0.97	0.94	8.15	4.55	12.21	12.33	12.27
Brady Corp.	0.95	0.72	0.83	8.15	4.55	11.32	11.66	11.49
BWX Technologies	0.85	0.87	0.86	8.15	4.55	11.56	11.85	11.70
CACI Int'l	0.90	0.82	0.86	8.15	4.55	11.56	11.85	11.70
Casey's Gen'l Stores	0.90	0.66	0.78	8.15	4.55	10.91	11.36	11.13
Cencora	0.75	0.56	0.65	8.15	4.55	9.85	10.56	10.21
CSW Industrials	0.90	1.26	1.08	8.15	4.55	13.35	13.19	13.27
CVS Health	0.90	0.76	0.83	8.15	4.55	11.32	11.66	11.49
Danaher Corp.	0.90	0.90	0.90	8.15	4.55	11.89	12.09	11.99
Dolby Labs.	0.95	0.89	0.92	8.15	4.55	12.05	12.21	12.13
Exponent, Inc.	1.00	1.14	1.07	8.15	4.55	13.27	13.13	13.20
Fastenal Co.	0.85	0.93	0.89	8.15	4.55	11.80	12.03	11.92
Franklin Electric	0.90	1.01	0.96	8.15	4.55	12.38	12.46	12.42
GATX Corp.	0.95	1.04	1.00	8.15	4.55	12.70	12.70	12.70
Henry (Jack) & Assoc	0.85	0.69	0.77	8.15	4.55	10.83	11.30	11.06
Hunt (J.B.)	0.95	1.07	1.01	8.15	4.55	12.78	12.76	12.77
Huntington Ingalls	0.95	1.04	1.00	8.15	4.55	12.70	12.70	12.70
L3Harris Technologie	0.90	0.85	0.88	8.15	4.55	11.72	11.97	11.85
Landstar System	0.80	0.99	0.90	8.15	4.55	11.89	12.09	11.99
Lockheed Martin	0.85	0.47	0.66	8.15	4.55	9.93	10.62	10.28
McKesson Corp.	0.80	0.66	0.73	8.15	4.55	10.50	11.05	10.78
Microsoft Corp.	0.90	1.03	0.97	8.15	4.55	12.46	12.52	12.49
MSC Industrial Direc	0.90	0.88	0.89	8.15	4.55	11.80	12.03	11.92
Oracle Corp.	0.85	1.36	1.11	8.15	4.55	13.60	13.37	13.49
O'Reilly Automotive	0.90	0.59	0.75	8.15	4.55	10.66	11.17	10.92
OSI Systems	0.95	1.25	1.10	8.15	4.55	13.52	13.31	13.41
Packaging Corp.	0.95	0.79	0.87	8.15	4.55	11.64	11.91	11.77
Pfizer, Inc.	0.80	0.47	0.64	8.15	4.55	9.77	10.50	10.13
Philip Morris Int'l	0.90	0.45	0.67	8.15	4.55	10.01	10.68	10.35
Prestige Consumer	0.90	0.67	0.78	8.15	4.55	10.91	11.36	11.13
Selective Ins. Group	0.90	0.66	0.78	8.15	4.55	10.91	11.36	11.13
Service Corp. Int'l	0.95	0.90	0.92	8.15	4.55	12.05	12.21	12.13
Sherwin-Williams	0.95	1.16	1.05	8.15	4.55	13.11	13.01	13.06
Smith (A.O.)	0.90	0.96	0.93	8.15	4.55	12.13	12.27	12.20
Thermo Fisher Sci.	0.85	0.83	0.84	8.15	4.55	11.40	11.72	11.56
UniFirst Corp.	0.90	0.62	0.76	8.15	4.55	10.75	11.23	10.99
UnitedHealth Group	0.95	0.36	0.65	8.15	4.55	9.85	10.56	10.21
Universal Corp.	0.85	0.68	0.77	8.15	4.55	10.83	11.30	11.06
VeriSign Inc.	0.90	0.67	0.78	8.15	4.55	10.91	11.36	11.13
Waters Corp.	0.90	0.94	0.92	8.15	4.55	12.05	12.21	12.13
Watsco, Inc.	0.90	1.34	1.12	8.15	4.55	13.68	13.44	13.56
		Mean	0.86			11.58 %	11.86 %	11.72 %
		Median	0.87			11.64 %	11.91 %	11.77 %
		Average of Mean and Median	0.87			11.61 %	11.89 %	11.75 %

Notes on page 9 of this Exhibit

Kentucky Utilities Company / Louisville Gas & Electric Company  
Traditional CAPM and ECAPM Results for the Proxy Groups of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Proxy Group of Forty-Nine Non-Price Regulated Companies (Excl. PRPM MRP)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Forty-Nine 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)
Abbott Labs.	0.85	0.62	0.73	8.14 %	4.55 %	10.49 %	11.04 %	10.77 %
AbbVie Inc.	0.80	0.49	0.65	8.14	4.55	9.84	10.56	10.20
Air Products & Chem.	0.90	0.89	0.89	8.14	4.55	11.80	12.02	11.91
Alphabet Inc.	0.90	0.98	0.94	8.14	4.55	12.21	12.33	12.27
Altria Group	0.85	0.46	0.66	8.14	4.55	9.92	10.62	10.27
Apple Inc.	0.95	0.93	0.94	8.14	4.55	12.21	12.33	12.27
Assurant Inc.	0.90	0.79	0.84	8.14	4.55	11.39	11.72	11.55
AutoZone Inc.	0.90	0.69	0.80	8.14	4.55	11.06	11.47	11.27
Booz Allen Hamilton	0.90	0.97	0.94	8.14	4.55	12.21	12.33	12.27
Brady Corp.	0.95	0.72	0.83	8.14	4.55	11.31	11.66	11.48
BWX Technologies	0.85	0.87	0.86	8.14	4.55	11.55	11.84	11.70
CACI Int'l	0.90	0.82	0.86	8.14	4.55	11.55	11.84	11.70
Casey's Gen'l Stores	0.90	0.66	0.78	8.14	4.55	10.90	11.35	11.13
Cencora	0.75	0.56	0.65	8.14	4.55	9.84	10.56	10.20
CSW Industrials	0.90	1.26	1.08	8.14	4.55	13.35	13.18	13.26
CVS Health	0.90	0.76	0.83	8.14	4.55	11.31	11.66	11.48
Danaher Corp.	0.90	0.90	0.90	8.14	4.55	11.88	12.08	11.98
Dolby Labs.	0.95	0.89	0.92	8.14	4.55	12.04	12.21	12.12
Exponent, Inc.	1.00	1.14	1.07	8.14	4.55	13.26	13.12	13.19
Fastenal Co.	0.85	0.93	0.89	8.14	4.55	11.80	12.02	11.91
Franklin Electric	0.90	1.01	0.96	8.14	4.55	12.37	12.45	12.41
GATX Corp.	0.95	1.04	1.00	8.14	4.55	12.69	12.69	12.69
Henry (Jack) & Assoc	0.85	0.69	0.77	8.14	4.55	10.82	11.29	11.05
Hunt (J.B.)	0.95	1.07	1.01	8.14	4.55	12.78	12.75	12.76
Huntington Ingalls	0.95	1.04	1.00	8.14	4.55	12.69	12.69	12.69
L3Harris Technologie	0.90	0.85	0.88	8.14	4.55	11.72	11.96	11.84
Landstar System	0.80	0.99	0.90	8.14	4.55	11.88	12.08	11.98
Lockheed Martin	0.85	0.47	0.66	8.14	4.55	9.92	10.62	10.27
McKesson Corp.	0.80	0.66	0.73	8.14	4.55	10.49	11.04	10.77
Microsoft Corp.	0.90	1.03	0.97	8.14	4.55	12.45	12.51	12.48
MSC Industrial Direc	0.90	0.88	0.89	8.14	4.55	11.80	12.02	11.91
Oracle Corp.	0.85	1.36	1.11	8.14	4.55	13.59	13.37	13.48
O'Reilly Automotive	0.90	0.59	0.75	8.14	4.55	10.66	11.17	10.91
OSI Systems	0.95	1.25	1.10	8.14	4.55	13.51	13.30	13.41
Packaging Corp.	0.95	0.79	0.87	8.14	4.55	11.63	11.90	11.77
Pfizer, Inc.	0.80	0.47	0.64	8.14	4.55	9.76	10.49	10.13
Philip Morris Int'l	0.90	0.45	0.67	8.14	4.55	10.01	10.68	10.34
Prestige Consumer	0.90	0.67	0.78	8.14	4.55	10.90	11.35	11.13
Selective Ins. Group	0.90	0.66	0.78	8.14	4.55	10.90	11.35	11.13
Service Corp. Int'l	0.95	0.90	0.92	8.14	4.55	12.04	12.21	12.12
Sherwin-Williams	0.95	1.16	1.05	8.14	4.55	13.10	13.00	13.05
Smith (A.O.)	0.90	0.96	0.93	8.14	4.55	12.12	12.27	12.19
Thermo Fisher Sci.	0.85	0.83	0.84	8.14	4.55	11.39	11.72	11.55
UniFirst Corp.	0.90	0.62	0.76	8.14	4.55	10.74	11.23	10.98
UnitedHealth Group	0.95	0.36	0.65	8.14	4.55	9.84	10.56	10.20
Universal Corp.	0.85	0.68	0.77	8.14	4.55	10.82	11.29	11.05
VeriSign Inc.	0.90	0.67	0.78	8.14	4.55	10.90	11.35	11.13
Waters Corp.	0.90	0.94	0.92	8.14	4.55	12.04	12.21	12.12
Watsco, Inc.	0.90	1.34	1.12	8.14	4.55	13.67	13.43	13.55
Mean			0.86			11.58 %	11.85 %	11.71 %
Median			0.87			11.63 %	11.90 %	11.77 %
Average of Mean and Median			0.87			11.61 %	11.88 %	11.74 %

Notes:

- (1) From note 1 of page 3 of Exhibit DWD-5.
- (2) From note 2 of page 3 of Exhibit DWD-5.
- (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.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Traditional CAPM and ECAPM Results for the Proxy Groups of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Proxy Group of Forty-Seven Non-Price Regulated Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Forty-Seven 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	NMF	0.95	0.95	8.15 %	4.55 %	12.29 %	12.40 %	12.34 %
Abbott Laboratories	0.85	0.62	0.73	8.15	4.55	10.50	11.05	10.78
Agilent Technologies, Inc.	0.90	1.02	0.96	8.15	4.55	12.38	12.46	12.42
Air Products and Chemicals, Inc.	0.90	0.89	0.89	8.15	4.55	11.80	12.03	11.92
Allstate Corporation	1.00	0.63	0.81	8.15	4.55	11.15	11.54	11.35
Altria Group, Inc.	0.85	0.46	0.66	8.15	4.55	9.93	10.62	10.28 (4)
Analog Devices, Inc.	1.00	1.19	1.09	8.15	4.55	13.44	13.25	13.34
Archer-Daniels-Midland Company	0.95	0.59	0.77	8.15	4.55	10.83	11.30	11.06
Assurant, Inc.	0.90	0.79	0.84	8.15	4.55	11.40	11.72	11.56
Brady Corporation	0.95	0.72	0.83	8.15	4.55	11.32	11.66	11.49
Broadridge Financial Solutions, Inc.	0.90	0.86	0.88	8.15	4.55	11.72	11.97	11.85
Brown & Brown, Inc.	1.00	0.72	0.86	8.15	4.55	11.56	11.85	11.70
Brown-Forman Corporation 'B'	0.90	0.82	0.86	8.15	4.55	11.56	11.85	11.70
CACI International Inc	0.90	0.82	0.86	8.15	4.55	11.56	11.85	11.70
Cisco Systems, Inc.	0.85	0.81	0.83	8.15	4.55	11.32	11.66	11.49
Danaher Corporation	0.90	0.90	0.90	8.15	4.55	11.89	12.09	11.99
Dolby Laboratories, Inc.	0.95	0.89	0.92	8.15	4.55	12.05	12.21	12.13
Expeditors International	0.90	0.77	0.84	8.15	4.55	11.40	11.72	11.56
FactSet Research Systems Inc.	1.00	0.84	0.92	8.15	4.55	12.05	12.21	12.13
Fastenal Company	0.85	0.93	0.89	8.15	4.55	11.80	12.03	11.92
Federal Signal Corporation	1.00	1.25	1.13	8.15	4.55	13.76	13.50	13.63 (4)
Franklin Electric Co., Inc.	0.90	1.01	0.96	8.15	4.55	12.38	12.46	12.42
GATX Corporation	0.95	1.04	1.00	8.15	4.55	12.70	12.70	12.70
Gentex Corporation	1.00	0.95	0.98	8.15	4.55	12.54	12.58	12.56
Home Depot, Inc.	0.95	1.08	1.01	8.15	4.55	12.78	12.76	12.77
Ingredion, Inc.	0.90	0.71	0.80	8.15	4.55	11.07	11.48	11.27
Innospec Inc.	0.95	1.15	1.05	8.15	4.55	13.11	13.01	13.06
International Business Machines Corporation	0.95	0.77	0.86	8.15	4.55	11.56	11.85	11.70
Juniper Networks, Inc.	0.95	0.62	0.79	8.15	4.55	10.99	11.42	11.20
Lockheed Martin Corporation	0.85	0.47	0.66	8.15	4.55	9.93	10.62	10.28 (4)
Microsoft Corporation	0.90	1.03	0.97	8.15	4.55	12.46	12.52	12.49
Motorola Solutions, Inc.	0.95	0.94	0.94	8.15	4.55	12.21	12.33	12.27
MSA Safety, Inc.	1.00	0.90	0.95	8.15	4.55	12.29	12.40	12.34
MSC Industrial Direct Co., Inc.	0.90	0.88	0.89	8.15	4.55	11.80	12.03	11.92
O'Reilly Automotive, Inc.	0.90	0.59	0.75	8.15	4.55	10.66	11.17	10.92
Packaging Corporation of America	0.95	0.79	0.87	8.15	4.55	11.64	11.91	11.77
Philip Morris International Inc.	0.90	0.45	0.67	8.15	4.55	10.01	10.68	10.35
Selective Insurance Group, Inc.	0.90	0.66	0.78	8.15	4.55	10.91	11.36	11.13
Sensient Technologies Corporation	0.95	0.97	0.96	8.15	4.55	12.38	12.46	12.42
Sherwin-Williams Company	0.95	1.16	1.05	8.15	4.55	13.11	13.01	13.06
Smith Corporation (A.O.)	0.90	0.96	0.93	8.15	4.55	12.13	12.27	12.20
Texas Instruments Incorporated	0.90	1.09	0.99	8.15	4.55	12.62	12.64	12.63
Thermo Fisher Scientific Inc.	0.85	0.83	0.84	8.15	4.55	11.40	11.72	11.56
UniFirst Corporation	0.90	0.62	0.76	8.15	4.55	10.75	11.23	10.99
VeriSign, Inc.	0.90	0.67	0.78	8.15	4.55	10.91	11.36	11.13
Verisk Analytics, Inc.	0.90	0.72	0.81	8.15	4.55	11.15	11.54	11.35
Zoetis, Inc.	1.00	0.86	0.93	8.15	4.55	12.13	12.27	12.20
		Mean	0.88			11.73 %	11.97 %	11.88 %
		Median	0.88			11.72 %	11.97 %	11.89 %
		Average of Mean and Median	0.88			11.73 %	11.97 %	11.89 %

Notes on page 11 of this Exhibit

Kentucky Utilities Company / Louisville Gas & Electric Company  
Traditional CAPM and ECAPM Results for the Proxy Groups of Non-Price-Regulated Companies Comparable in Total Risk to the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Proxy Group of Forty-Seven Non-Price Regulated Companies (Excl. PRPM MRP)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Forty-Seven 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	NMF	0.95	0.95	8.14 %	4.55 %	12.29 %	12.39 %	12.34 %
Abbott Laboratories	0.85	0.62	0.73	8.14	4.55	10.49	11.04	10.77
Agilent Technologies, Inc.	0.90	1.02	0.96	8.14	4.55	12.37	12.45	12.41
Air Products and Chemicals, Inc.	0.90	0.89	0.89	8.14	4.55	11.80	12.02	11.91
Allstate Corporation	1.00	0.63	0.81	8.14	4.55	11.15	11.53	11.34
Altria Group, Inc.	0.85	0.46	0.66	8.14	4.55	9.92	10.62	10.27 (4)
Analog Devices, Inc.	1.00	1.19	1.09	8.14	4.55	13.43	13.24	13.33
Archer-Daniels-Midland Company	0.95	0.59	0.77	8.14	4.55	10.82	11.29	11.05
Assurant, Inc.	0.90	0.79	0.84	8.14	4.55	11.39	11.72	11.55
Brady Corporation	0.95	0.72	0.83	8.14	4.55	11.31	11.66	11.48
Broadridge Financial Solutions, Inc.	0.90	0.86	0.88	8.14	4.55	11.72	11.96	11.84
Brown & Brown, Inc.	1.00	0.72	0.86	8.14	4.55	11.55	11.84	11.70
Brown-Forman Corporation 'B'	0.90	0.82	0.86	8.14	4.55	11.55	11.84	11.70
CACI International Inc	0.90	0.82	0.86	8.14	4.55	11.55	11.84	11.70
Cisco Systems, Inc.	0.85	0.81	0.83	8.14	4.55	11.31	11.66	11.48
Danaher Corporation	0.90	0.90	0.90	8.14	4.55	11.88	12.08	11.98
Dolby Laboratories, Inc.	0.95	0.89	0.92	8.14	4.55	12.04	12.21	12.12
Expeditors International	0.90	0.77	0.84	8.14	4.55	11.39	11.72	11.55
FactSet Research Systems Inc.	1.00	0.84	0.92	8.14	4.55	12.04	12.21	12.12
Fastenal Company	0.85	0.93	0.89	8.14	4.55	11.80	12.02	11.91
Federal Signal Corporation	1.00	1.25	1.13	8.14	4.55	13.75	13.49	13.62 (4)
Franklin Electric Co., Inc.	0.90	1.01	0.96	8.14	4.55	12.37	12.45	12.41
GATX Corporation	0.95	1.04	1.00	8.14	4.55	12.69	12.69	12.69
Gentex Corporation	1.00	0.95	0.98	8.14	4.55	12.53	12.57	12.55
Home Depot, Inc.	0.95	1.08	1.01	8.14	4.55	12.78	12.75	12.76
Ingredion, Inc.	0.90	0.71	0.80	8.14	4.55	11.06	11.47	11.27
Innospec Inc.	0.95	1.15	1.05	8.14	4.55	13.10	13.00	13.05
International Business Machines Corporation	0.95	0.77	0.86	8.14	4.55	11.55	11.84	11.70
Juniper Networks, Inc.	0.95	0.62	0.79	8.14	4.55	10.98	11.41	11.20
Lockheed Martin Corporation	0.85	0.47	0.66	8.14	4.55	9.92	10.62	10.27 (4)
Microsoft Corporation	0.90	1.03	0.97	8.14	4.55	12.45	12.51	12.48
Motorola Solutions, Inc.	0.95	0.94	0.94	8.14	4.55	12.21	12.33	12.27
MSA Safety, Inc.	1.00	0.90	0.95	8.14	4.55	12.29	12.39	12.34
MSC Industrial Direct Co., Inc.	0.90	0.88	0.89	8.14	4.55	11.80	12.02	11.91
O'Reilly Automotive, Inc.	0.90	0.59	0.75	8.14	4.55	10.66	11.17	10.91
Packaging Corporation of America	0.95	0.79	0.87	8.14	4.55	11.63	11.90	11.77
Philip Morris International Inc.	0.90	0.45	0.67	8.14	4.55	10.01	10.68	10.34
Selective Insurance Group, Inc.	0.90	0.66	0.78	8.14	4.55	10.90	11.35	11.13
Sensient Technologies Corporation	0.95	0.97	0.96	8.14	4.55	12.37	12.45	12.41
Sherwin-Williams Company	0.95	1.16	1.05	8.14	4.55	13.10	13.00	13.05
Smith Corporation (A.O.)	0.90	0.96	0.93	8.14	4.55	12.12	12.27	12.19
Texas Instruments Incorporated	0.90	1.09	0.99	8.14	4.55	12.61	12.63	12.62
Thermo Fisher Scientific Inc.	0.85	0.83	0.84	8.14	4.55	11.39	11.72	11.55
UniFirst Corporation	0.90	0.62	0.76	8.14	4.55	10.74	11.23	10.98
VeriSign, Inc.	0.90	0.67	0.78	8.14	4.55	10.90	11.35	11.13
Verisk Analytics, Inc.	0.90	0.72	0.81	8.14	4.55	11.15	11.53	11.34
Zoetis, Inc.	1.00	0.86	0.93	8.14	4.55	12.12	12.27	12.19
		Mean	0.88			11.72 %	11.97 %	11.88 %
		Median	0.88			11.72 %	11.96 %	11.88 %
		Average of Mean and Median	0.88			11.72 %	11.97 %	11.88 %

Notes:

- (1) From note 1 of page 3 of Exhibit DWD-5.
- (2) From note 2 of page 3 of Exhibit DWD-5.
- (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.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Derivation of Investment Risk Adjustment Based upon  
Ibbotson Associates' Size Premia for the Decile Portfolios of the NYSE/AMEX/NASDAQ

		[1]		[2]	[3]	[4]
Line No.		Market Capitalization on February 28, 2025 (1)		Applicable Decile of the NYSE/AMEX/NASDAQ (2)	Applicable Size Premium (3)	Spread from Applicable Size Premium (4)
		( millions )	(times larger)			
1.	a. <u>Kentucky Utilities Company</u>	\$ 6,462.402		4	0.64%	
	b. <u>Louisville Gas &amp; Electric Company - Electric</u>	\$ 3,970.346		5	0.95%	
	c. <u>Louisville Gas &amp; Electric Company - Gas</u>	\$ 1,174.887		7	1.39%	
2.	a. <u>Proxy Group of Fifteen Electric Companies</u>	\$ 16,525.930	2.6 x	2	0.46%	0.18%
	b. <u>Proxy Group of Fifteen Electric Companies</u>	\$ 16,525.930	4.2 x	2	0.46%	0.49%
	c. <u>Companies</u>	\$ 4,721.136	4.0 x	4	0.64%	0.75%
		[A]		[B]	[C]	[D]
				Market Capitalization of Smallest Company ( millions )	Market Capitalization of Largest Company ( millions )	Size Premium (Return in Excess of CAPM)*
		Decile				
		Largest	1	\$ 36,942.976	\$ 2,662,326.048	-0.06%
			2	14,910.719	36,391.113	0.46%
			3	7,493.607	14,820.048	0.61%
			4	4,622.261	7,461.284	0.64%
			5	3,011.224	4,621.785	0.95%
			6	1,864.293	3,010.806	1.21%
			7	1,050.083	1,862.491	1.39%
			8	555.880	1,046.037	1.14%
			9	213.039	554.523	1.99%
		Smallest	10	1.576	212.644	4.70%

\*From 2024 Kroll Cost of Capital Navigator

Notes:

- (1) From page 2 of this Exhibit.
- (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 0.18% in Column [4], Line No. 2 is derived as follows 0.18% = 0.64% - 0.46%.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Market Capitalization of Kentucky Utilities Company / Louisville Gas & Electric Company and the  
Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies

Company	Exchange	[1]	[2]	[3]	[4]	[5]	[6]
		Common Stock Shares Outstanding at Fiscal Year End 2023 ( millions )	Book Value per Share at Fiscal Year End 2023 (1)	Total Common Equity at Fiscal Year End 2023 ( millions )	Closing Stock Market Price on February 28, 2025	Market-to- Book Ratio on February 28, 2025 (2)	Market Capitalization on February 28, 2025 (3) ( millions )
Kentucky Utilities Company		NA	NA	\$ 3,221.536 (4)	NA		
Louisville Gas & Electric Company - Electric		NA	NA	\$ 1,979.235 (4)	NA		
Louisville Gas & Electric Company - Gas		NA	NA	\$ 723.898 (4)	NA		
Based upon Proxy Group of Fifteen Electric Companies						200.6 (5)	\$ 6,462.402 (6)
Based upon Proxy Group of Fifteen Electric Companies						200.6 (5)	\$ 3,970.346 (6)
Based upon Proxy Group of Seven Natural Gas Distribution Companies						162.3 (5)	\$ 1,174.887 (6)
Proxy Group of Seven Natural Gas Distribution Companies							
Atmos Energy Corporation	NYSE	148.49	\$ 73.203	\$ 10,870.06	\$ 152.13	207.8 %	\$ 22,590.207
New Jersey Resources Corporation	NYSE	97.58	20.40	1,990.74	48.38	237.20	4,721.14
NISource Inc.	NYSE	447.38	17.40	7,783.50	40.81	234.60	18,257.65
Northwest Natural Holding Company	NYSE	37.63	34.12	1,283.84	40.88	119.80	1,538.36
ONE Gas, Inc.	NYSE	56.55	48.91	2,765.88	75.15	153.60	4,249.43
Southwest Gas Holding Company	NYSE	71.56	46.25	3,310.04	75.05	162.30	5,370.86
Spire Inc.	NYSE	53.17	54.87	2,917.30	76.86	140.10	4,086.66
Median		71.564	\$ 46.253	\$ 2,917.300	\$ 75.050	162.3 %	\$ 4,721.136
Proxy Group of Fifteen Electric Companies							
Alliant Energy Corporation	NASDAQ	256.10	\$ 26.463	\$ 6,777.00	\$ 64.53	243.8 %	\$ 16,525.930
Ameren Corporation	NYSE	266.30	42.62	11,349.00	101.56	238.30	27,045.43
American Electric Power Corporation	NASDAQ	526.18	47.98	25,246.70	106.05	221.00	55,801.88
Duke Energy Corporation	NYSE	771.00	61.15	47,150.00	117.49	192.10	90,584.79
Edison International	NYSE	383.92	36.02	13,828.00	54.44	151.20	20,900.87
Entergy Corporation	NYSE	212.85	68.70	14,622.65	87.31	127.10	18,583.81
Eversource Energy	NASDAQ	229.73	42.06	9,663.10	68.91	163.80	15,830.65
IDACORP, Inc.	NYSE	50.62	57.45	2,907.57	117.91	205.30	5,968.04
North Western Corporation	NASDAQ	64.76	43.01	2,785.31	55.93	130.00	3,622.13
OGE Energy Corporation	NYSE	200.30	22.52	4,511.60	46.28	205.50	9,269.88
Pinnacle West Capital Corporation	NYSE	113.54	54.41	6,177.66	92.54	170.10	10,506.78
Portland General Electric Company	NYSE	101.16	32.81	3,319.00	44.83	136.60	4,534.99
Southern Company	NYSE	1,092.00	28.80	31,444.00	89.79	311.80	98,050.68
TXNM Energy, Inc.	NYSE	90.20	26.04	2,349.09	52.25	200.60	4,712.97
Xcel Energy Inc.	NASDAQ	554.94	31.75	17,617.00	72.10	227.10	40,011.30
Median		229.729	\$ 42.063	\$ 9,663.100	\$ 72.100	200.6 %	\$ 16,525.930

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 Kentucky Utilities Company / Louisville Gas & Electric Company on February 28, 2025 is assumed to be equal to the market-to-book ratio of Proxy Group of Seven Natural Gas Distribution Companies and Proxy Group of Fifteen Electric Companies on February 28, 2025 as appropriate.

(6) Column [3] multiplied by Column [5].

Source of Information: 2023 Annual Forms 10K  
Bloomberg Professional

Kentucky Utilities Company / Louisville Gas & Electric CompanyHypothetical Example: Flotation Cost Recovery

Return on Equity	10.75%
Flotation Costs	2.75%
Market Value	\$ 25.00
Dividend Yield	3.50%
Growth Rate	7.25%
Adjusted ROE	10.85%
<b>Flotation Cost Recovery:</b>	<b>No</b>
<b>DCF Estimate</b>	<b>10.65%</b>

	Common Stock	Retained Earnings	Book Value	Market Price	Market/ Book Value	Earnings Per Share	Dividends Per Share	Payout Ratio
1	\$ 24.31		\$ 24.31	\$ 25.00	1.0283	\$ 2.61	\$ 0.88	33.48%
2	\$ 24.31	\$ 1.74	\$ 26.05	\$ 26.79	1.0283	\$ 2.80	\$ 0.94	33.48%
3	\$ 24.31	\$ 3.60	\$ 27.91	\$ 28.70	1.0283	\$ 3.00	\$ 1.00	33.48%
4	\$ 24.31	\$ 5.60	\$ 29.91	\$ 30.76	1.0283	\$ 3.22	\$ 1.08	33.48%
5	\$ 24.31	\$ 7.74	\$ 32.05	\$ 32.96	1.0283	\$ 3.45	\$ 1.15	33.48%
6	\$ 24.31	\$ 10.03	\$ 34.34	\$ 35.31	1.0283	\$ 3.69	\$ 1.24	33.48%
7	\$ 24.31	\$ 12.48	\$ 36.80	\$ 37.84	1.0283	\$ 3.96	\$ 1.32	33.48%
8	\$ 24.31	\$ 15.12	\$ 39.43	\$ 40.54	1.0283	\$ 4.24	\$ 1.42	33.48%
9	\$ 24.31	\$ 17.94	\$ 42.25	\$ 43.44	1.0283	\$ 4.54	\$ 1.52	33.48%
10	\$ 24.31	\$ 20.96	\$ 45.27	\$ 46.55	1.0283	\$ 4.87	\$ 1.63	33.48%
Growth Rate			7.15%	7.15%		7.15%	7.15%	

Return on Equity	10.75%
Flotation Costs	2.75%
Market Value	\$ 25.00
Dividend Yield	3.50%
Growth Rate	7.25%
Adjusted ROE	10.85%
<b>Flotation Cost Recovery:</b>	<b>Yes</b>
<b>DCF Estimate</b>	<b>10.75%</b>

	Common Stock	Retained Earnings	Book Value	Market Price	Market/ Book Value	Earnings Per Share	Dividends Per Share	Payout Ratio
1	\$ 24.31		\$ 24.31	\$ 25.00	1.0283	\$ 2.64	\$ 0.88	33.17%
2	\$ 24.31	\$ 1.76	\$ 26.08	\$ 26.81	1.0283	\$ 2.83	\$ 0.94	33.17%
3	\$ 24.31	\$ 3.65	\$ 27.97	\$ 28.76	1.0283	\$ 3.03	\$ 1.01	33.17%
4	\$ 24.31	\$ 5.68	\$ 29.99	\$ 30.84	1.0283	\$ 3.25	\$ 1.08	33.17%
5	\$ 24.31	\$ 7.86	\$ 32.17	\$ 33.08	1.0283	\$ 3.49	\$ 1.16	33.17%
6	\$ 24.31	\$ 10.19	\$ 34.50	\$ 35.48	1.0283	\$ 3.74	\$ 1.24	33.17%
7	\$ 24.31	\$ 12.69	\$ 37.00	\$ 38.05	1.0283	\$ 4.01	\$ 1.33	33.17%
8	\$ 24.31	\$ 15.37	\$ 39.68	\$ 40.81	1.0283	\$ 4.31	\$ 1.43	33.17%
9	\$ 24.31	\$ 18.25	\$ 42.56	\$ 43.76	1.0283	\$ 4.62	\$ 1.53	33.17%
10	\$ 24.31	\$ 21.33	\$ 45.65	\$ 46.94	1.0283	\$ 4.95	\$ 1.64	33.17%
Growth Rate			7.25%	7.25%		7.25%	7.25%	

Kentucky Utilities Company / Louisville Gas & Electric Company  
Derivation of the Flotation Cost Adjustment to the Cost of Common Equity

Equity Issuances since 2005

		[Column 1]	[Column 2]	[Column 3]	[Column 4]	[Column 5]	[Column 6]	[Column 7]	[Column 8]	[Column 9]	[Column 10]
Date of Offering	Transaction (1)	Shares Issued (1)	Market Price per Share (1)	Average Offering Price per Share (1)	Market Pressure (2)	Issuance Expense	Net Proceeds per Share (3)	Gross Equity Issue before Costs (4)	Total Net Proceeds (5)	Total Flotation Costs (6)	Flotation Cost Percentage (7)
5/8/2018	Equity Offering	55,000,000	\$ 27.45	\$ 27.00	\$ 0.45	\$ 0.312	\$ 26.69	\$ 1,509,750,000	\$ 1,467,813,500	\$ 41,936,500	2.78%
4/10/2012	Equity Offering	9,900,000	\$ 27.06	\$ 27.02	\$ 0.04	\$ 0.716	\$ 26.30	\$ 267,894,000	\$ 260,412,000	\$ 7,482,000	2.79%
4/11/2011	Equity Offering	80,000,000	\$ 25.69	\$ 25.30	\$ 0.39	\$ 0.772	\$ 24.53	\$ 2,055,200,000	\$ 1,962,280,000	\$ 92,920,000	4.52%
6/22/2010	Equity Offering	90,000,000	\$ 24.24	\$ 24.00	\$ 0.24	\$ 0.726	\$ 23.27	\$ 2,181,600,000	\$ 2,094,700,000	\$ 86,900,000	3.98%
								<u>\$ 6,014,444,000</u>	<u>\$ 5,785,205,500</u>	<u>\$ 229,238,500</u>	<u>3.81%</u>

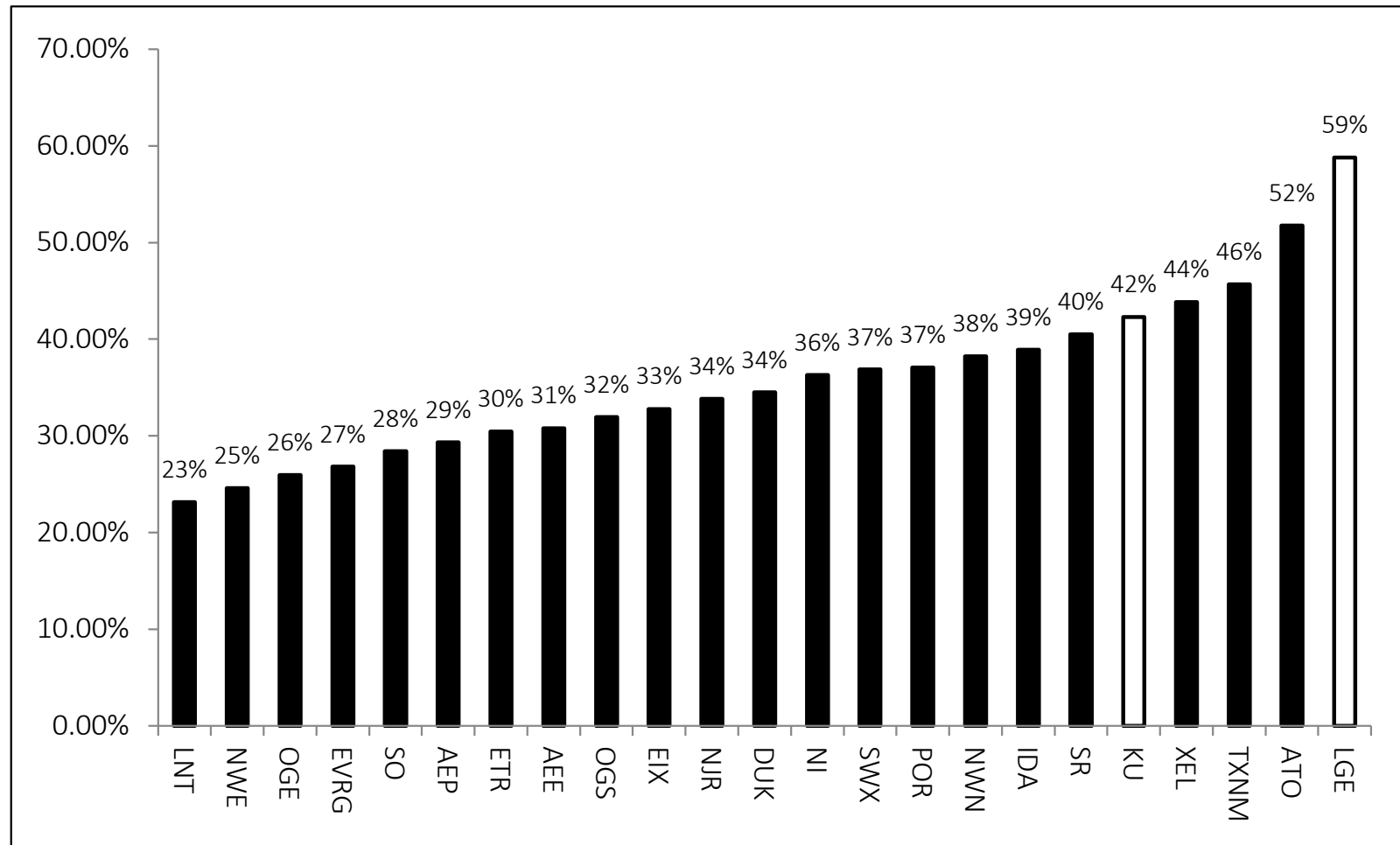
Flotation Cost Adjustment

	[Column 11]	[Column 12]	[Column 13]	[Column 14]	[Column 15]	[Column 16]
	Average Dividend Yield	Average Projected EPS Growth Rate	Adjusted Dividend Yield	Average DCF Cost Rate Unadjusted for Flotation (8)	DCF Cost Rate Adjusted for Flotation (9)	Flotation Cost Adjustment (10)
Proxy Group of Seven Natural Gas Companies and Fifteen Electric Companies	<u>3.76 %</u>	<u>6.44 %</u>	<u>3.88 %</u>	<u>10.32 %</u>	<u>10.47 %</u>	<u>0.15 %</u>

- Notes: (1) From company SEC filings  
(2) Col. 2 - Col. 3  
(3) Col. 2 - Col. 4 - Col. 5  
(4) Col. 1 x Col. 2  
(5) Col. 1 x Col. 6  
(6) Col. 1 \*(Col. 4 + Col. 5)  
(7) (Col. 7 - Col. 8) / Col. 7  
(8) Col. 12 + Col. 13  
(9) (Col. 13 / (1 - Col. 10)) + Col. 12  
(10) Col. 15 - Col. 14

Source of Information: Company SEC filings.

Kentucky Utilities Company / Louisville Gas & Electric Company  
Comparison of Projected Capital Expenditures Relative to Net Plant



Sources of Information: *Value Line Investment Survey*  
PPL 2024 SEC Form 10-K

Louisville Gas & Electric and Kentucky Utilities

### Adjustment Clauses and Alternative Forms of Rate Regulation Allowed for Exelon Utilities and Electric and Gas Proxy Group Subsidiaries

Company	Parent	Elec/Gas	State	Fuel / Purchased Power	Decoupling [1]	Capital Investment [2]	Energy Efficiency [3]	Renewables & RPS [4]	Environmental [5]	Other [6]	Multi-Year Rate Plan	Formula-Based Rates	Formula-Based ROE	Other Performance Based Ratemaking [7]	Earnings Sharing Mechanism	Forward Test Year Allowed in Jurisdiction [8]
Ameren Illinois Company	AEE	Electric	Illinois		P	✓	✓	✓	✓	✓	✓			✓		✓
Union Electric Company	AEE	Electric	Missouri	✓	P	✓	✓	✓	✓	✓						K
Southwestern Electric Power Company	AEP	Electric	Arkansas	✓	P	✓	✓	✓	✓	✓		✓				K
Indiana Michigan Power Company	AEP	Electric	Indiana	✓	P	✓	✓	✓	✓	✓						K
Kentucky Power Company	AEP	Electric	Kentucky	✓	P	✓	✓	✓	✓	✓						✓
Southwestern Electric Power Company	AEP	Electric	Louisiana	✓	P	✓	✓	✓	✓	✓		✓		✓		✓
Indiana Michigan Power Company	AEP	Electric	Michigan	✓	P		✓	✓	✓	✓						✓
Ohio Power Company	AEP	Electric	Ohio		P	✓	✓	✓	✓	✓						✓
Public Service Company of Oklahoma	AEP	Electric	Oklahoma	✓	P	✓	✓	✓	✓	✓						K
Kingsport Power Company	AEP	Electric	Tennessee	✓			✓	✓		✓						✓
AEP Texas Inc.	AEP	Electric	Texas			✓	✓	✓	✓	✓						
Southwestern Electric Power Company	AEP	Electric	Texas	✓		✓	✓	✓	✓	✓						
Appalachian Power Company	AEP	Electric	Virginia	✓		✓	✓	✓	✓	✓	✓				✓	✓
Appalachian Power (Wheeling Power)	AEP	Electric	West Virginia	✓	P	✓	✓	✓	✓	✓	✓					K
Duke Energy Florida, LLC	DUK	Electric	Florida	✓		✓	✓	✓	✓	✓	✓		✓	✓		K
Duke Energy Indiana, LLC	DUK	Electric	Indiana	✓	P	✓	✓	✓	✓	✓						K
Duke Energy Kentucky, Inc.	DUK	Electric	Kentucky	✓	P	✓	✓	✓	✓	✓						K
Duke Energy Carolinas, LLC	DUK	Electric	North Carolina	✓	P	✓	✓	✓	✓	✓	✓			✓	✓	K
Duke Energy Progress, LLC	DUK	Electric	North Carolina	✓	P	✓	✓	✓	✓	✓				✓	✓	K
Duke Energy Ohio, Inc.	DUK	Electric	Ohio		P	✓	✓	✓		✓				✓		K
Duke Energy Carolinas, LLC	DUK	Electric	South Carolina	✓			✓	✓	✓	✓						K
Duke Energy Progress, LLC	DUK	Electric	South Carolina	✓			✓	✓	✓	✓						K
Southern California Edison Company	EXL	Electric	California	✓	F		✓	✓	✓	✓	✓		✓	✓		K
Entergy Arkansas LLC	ETR	Electric	Arkansas	✓	P	✓	✓	✓	✓	✓		✓				K
Entergy Louisiana LLC	ETR	Electric	Louisiana	✓	P	✓	✓	✓	✓	✓			✓			✓
Entergy Mississippi LLC	ETR	Electric	Mississippi	✓	P	✓	✓	✓	✓	✓		✓				K
Entergy New Orleans LLC	ETR	Electric	New Orleans	✓	F	✓	✓	✓	✓	✓		✓				✓
Entergy Texas Inc.	ETR	Electric	Texas	✓		✓	✓	✓	✓	✓						
Energy Kansas Central	EVRG	Electric	Kansas	✓	P	✓	✓	✓	✓	✓				✓		K
Energy Kansas Metro	EVRG	Electric	Kansas	✓		✓	✓	✓	✓	✓				✓		
Energy Missouri Metro	EVRG	Electric	Missouri	✓	P	✓	✓	✓	✓	✓						K
Energy Missouri West	EVRG	Electric	Missouri	✓	P	✓	✓	✓	✓	✓						K
Idaho Power Co.	IDA	Electric	Idaho	✓	F		✓	✓	✓	✓					✓	✓
Idaho Power Co.	IDA	Electric	Oregon	✓			✓	✓								✓
Interstate Power and Light Company	LNT	Electric	Iowa	✓			✓	✓	✓	✓						✓
Wisconsin Power and Light Company	LNT	Electric	Wisconsin	✓			✓	✓	✓	✓					✓	✓
NorthWestern Energy	NWE	Electric	Montana	✓		✓	✓	✓	✓	✓						K
NorthWestern Energy	NWE	Electric	South Dakota	✓			✓	✓	✓	✓						K
Oklahoma Gas and Electric Company	OGÉ	Electric	Arkansas	✓	P	✓	✓	✓	✓	✓		✓				K
Oklahoma Gas and Electric Company	OGÉ	Electric	Oklahoma	✓	P	✓	✓	✓	✓	✓				✓		K
Arizona Public Service Company	PNW	Electric	Arizona	✓	P	✓	✓	✓	✓	✓				✓		K
Portland General Electric Company	PG&E	Electric	Oregon	✓	P	✓	✓	✓	✓	✓					✓	✓
Alabama Power Company	SO	Electric	Alabama	✓		✓	✓	✓	✓	✓		✓		✓		K
Georgia Power Company	SO	Electric	Georgia	✓		✓	✓	✓	✓	✓	✓				✓	✓
Mississippi Power Company	SO	Electric	Mississippi	✓	P	✓	✓	✓	✓	✓		✓		✓		K
Public Service Company of New Mexico	TXNM	Electric	New Mexico	✓		✓	✓	✓	✓	✓			✓	✓		✓
Texas-New Mexico Power Company	TXNM	Electric	Texas			✓	✓	✓	✓	✓						
Public Service Company of Colorado	XEL	Electric	Colorado	✓	P	✓	✓	✓	✓	✓				✓		
Northern States Power Company - WI (Michigan)	XEL	Electric	Michigan	✓			✓	✓	✓	✓					✓	✓
Northern States Power Company - MN	XEL	Electric	Minnesota	✓	F	✓	✓	✓	✓	✓	✓					✓
Southwestern Public Service Company	XEL	Electric	New Mexico	✓			✓	✓	✓	✓						✓
Northern States Power Company - MN (North Dakota)	XEL	Electric	North Dakota	✓		✓	✓	✓	✓	✓				✓	✓	
Northern States Power Company - MN (North Dakota)	XEL	Electric	South Dakota	✓	P	✓	✓	✓	✓	✓						K
Southwestern Public Service Company	XEL	Electric	Texas	✓		✓	✓	✓	✓	✓						
Northern States Power Company - WI	XEL	Electric	Wisconsin	✓		✓	✓	✓	✓	✓					✓	✓

Louisville Gas & Electric and Kentucky Utilities  
Adjustment Clauses and Alternative Forms of Rate Regulation Allowed for Exelon Utilities and Electric and Gas Proxy Group Subsidiaries

Company	Parent	Elec/Gas	State	Fuel / Purchased Power	Decoupling [1]	Capital Investment [2]	Energy Efficiency [3]	Renewables & RPS [4]	Environmental [5]	Other [6]	Multi-Year Rate Plan	Formula-Based Rates	Formula-Based ROE	Other Performance Based Ratemaking [7]	Earnings Sharing Mechanism	Forward Test Year Allowed in Jurisdiction [8]
Atmos Colorado	ATO	Gas	Colorado			✓								✓		
Atmos Kansas	ATO	Gas	Kansas	✓	P	✓				✓						
Atmos Kentucky	ATO	Gas	Kentucky	✓	P	✓				✓				✓		✓
Atmos Louisiana	ATO	Gas	Louisiana	✓	P	✓						✓				✓
Atmos Mississippi	ATO	Gas	Mississippi	✓	P	✓						✓				K
Atmos Tennessee	ATO	Gas	Tennessee	✓	P	✓				✓				✓		✓
Atmos Pipeline	ATO	Gas	Texas	✓	P	✓						✓				K
Atmos Texas	ATO	Gas	Texas	✓	P	✓				✓		✓				K
Atmos Virginia	ATO	Gas	Virginia	✓	P	✓				✓						✓
New Jersey Natural Gas Company	NJR	Gas	New Jersey		P	✓	✓		✓							K
Northern Indiana Public Service Company, LLC	NI	Gas	Indiana	✓		✓	✓							✓		K
Columbia Gas of Kentucky, Inc.	NI	Gas	Kentucky	✓	P	✓	✓			✓						✓
Columbia Gas of Maryland, Inc.	NI	Gas	Maryland	✓	P	✓	✓									✓
Columbia Gas of Ohio, Inc.	NI	Gas	Ohio		P	✓	✓							✓		✓
Columbia Gas of Pennsylvania, Inc.	NI	Gas	Pennsylvania	✓	P	✓										✓
Columbia Gas of Virginia, Inc.	NI	Gas	Virginia		P	✓	✓									✓
Northwest Natural Gas Company	NWN	Gas	Oregon	✓	P		✓		✓						✓	✓
Northwest Natural Gas Company	NWN	Gas	Washington	✓			✓		✓		✓					K
Kansas Gas Service Company, Inc.	OGS	Gas	Kansas	✓	P	✓						✓				
Oklahoma Natural Gas Company	OGS	Gas	Oklahoma	✓	P		✓					✓	✓	✓	✓	K
Texas Gas Service Company, Inc.	OGS	Gas	Texas	✓	P	✓	✓			✓		✓				K
Southwest Gas Arizona	SWX	Gas	Arizona	✓	F			✓								K
Southwest Gas California	SWX	Gas	California	✓	F	✓	✓	✓			✓	✓		✓		✓
Southwest Gas Nevada	SWX	Gas	Nevada	✓	F		✓	✓		✓						K
Spire Alabama Inc.	SR	Gas	Alabama	✓	P							✓		✓		K
Spire Mississippi Inc.	SR	Gas	Mississippi	✓	P							✓	✓			K
Spire Missouri Inc.	SR	Gas	Missouri	✓	P	✓				✓						K
Louisville Gas & Electric		Electric	Kentucky	✓	P		✓	✓	✓							✓
Louisville Gas & Electric		Gas	Kentucky	✓	P	✓	✓							✓		✓
Kentucky Utilities		Electric	Kentucky	✓	P		✓	✓	✓							✓

Notes:

Note: A mechanism may cover one or more cost categories; therefore, designations may not indicate separate mechanisms for each category.

[1] Full or partial decoupling (such as Straight-Fixed Variable rate design, weather normalization clauses, and recovery of lost revenues as a result of Energy Efficiency programs).

[2] Includes recovery of costs related to targeted new generation projects, infrastructure replacement, system integrity/hardening, Smart Grid, AMI metering, and other capital expenditures.

[3] Utility-sponsored conservation, energy efficiency, load control, or other demand side management programs.

[4] Recovers costs associated with renewable energy projects, Distributed Energy Resources, REC purchases, net metering, RPS expense, and renewable PPAs.

[5] EPA upgrade costs, emissions control & allowance purchase costs, nuclear/coal plant decommissioning, and other costs to comply with state and federal environmental mandates.

[6] Cost recovery for items such as pension expenses, bad debt costs, storm costs, vegetation management, RT0/Transmission Expense, capacity costs, transmission costs, government & franchise fees and taxes, economic development, and low income programs.

[7] Includes other performance-incentive mechanisms.

[8] K = Known and Measurable. Partially forecasted test years are included.

Sources:

Edison Electric Institute (EEI) Innovative Regulatory Tools for Addressing an Increasingly Complex Energy Landscape: 2023 Update, February 2024; Regulatory Research Associates, Adjustment Clauses: A State-by-State Overview, July 18, 2022; Regulatory Research Associates Commission Profiles; SEC Form 10-Ks; Company Tariffs; Company Rate Filings.