

**BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

**In the Matter of the Application of Evergy )  
Kansas Central, Inc. and Evergy Kansas )  
South, Inc. for Approval to Make Certain ) Docket No. 25-EKCE-294-RTS  
Changes in their Charges for Electric )  
Service Pursuant to K.S.A. 66-117 )**

**Public Version**

**DIRECT TESTIMONY**

**PREPARED BY**

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**UTILITIES DIVISION**

**KANSAS CORPORATION COMMISSION**

**June 6, 2025**

**(\*Confidential Material Redacted\*)**

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1    **Q.     Would you please state your name and business address?**

2    A.     My name is Adam H. Gatewood. My business address is 1500 Southwest Arrowhead  
3           Road, Topeka, Kansas, 66604.

4    **Q.     Who is your employer, and what is your title?**

5    A.     I am a Senior Managing Financial Analyst in the Utilities Division of the Kansas  
6           Corporation Commission (Commission).

7    **Q.     What is your educational and professional background?**

8    A.     I graduated from Washburn University with a B.A. in Economics in 1987 and a Masters of  
9           Business Administration in 1995. I have filed testimony on cost of capital and related  
10          financial issues before the Commission in more than 160 proceedings. I have also filed  
11          testimony on cost of capital issues before the Federal Energy Regulatory Commission  
12          (FERC) in rate proceedings involving natural gas pipelines and electric transmission  
13          utilities.

14   **Q.     What issues are you testifying to in this Docket?**

15   A.     My testimony addresses the appropriate rate of return (ROR) for Evergy Kansas Central

(EKC) and Evergy Kansas South (EKS) used by the KCC Staff to calculate the respective revenue requirements for each utility. The appropriate ROR for each utility involves application of the Commission's policies for determining the cost of debt, the cost of equity, and the capital structure. My testimony presents my analysis for each of those components to the ROR and rebuttal to the ROR analyses of Evergy witnesses Ann E. Bulkley and Geoffrey T. Ley.

**Q. Are you offering legal analyses or conclusions?**

A. No, I am not an attorney. As such, I am not offering legal analyses or conclusions. However, my responsibilities as a financial analyst require that, with assistance from legal counsel, I understand court opinions and Commission orders so that I can apply rules, precedent, and policies to the facts of the cases I am analyzing. The analyses I sponsor are part of Staff's inter-disciplinary evaluation of overlapping law, economics, accounting, finance, ratemaking, and policy issues. Any testimony I provide on legal principles, or those areas of overlap is based on my experience and perspective as an experienced rate of return financial analyst.

**Q. Are you sponsoring any adjustments?**

A. I am responsible for the capital structure adjustments in Staff's Revenue Requirement Schedules.

**Q. Are you sponsoring any tables and schedules as part of your testimony?**

A. Yes, I sponsor the following tables and schedules: AHG-1, Value-Line Investment Survey

1 Reports; AHG-2, six-months of stock price data of the proxy group electric utilities; and  
2 AHG-3, a summary of internal rate of return calculations performed on the proxy group.

3 **Executive Summary**

4 **Q. Please summarize your findings.**

5 A. First, regarding the embedded cost of debt of EKC and EKS, the only adjustment involves  
6 Staff's update from the test year ended June 30, 2024, to Staff's update period of March  
7 30, 2025. Staff recommends that the Commission reject the use of proforma data shown  
8 in Section 7 of the Application sponsored by Geoffrey T. Ley, and instead, use Staff's  
9 March 30, 2025, updates.

10 Second, to determine a reasonable allowed return, Staff recommends that EKC and EKS  
11 be allocated a portion of Evergy's long-term debt. That allocation decreases the equity  
12 ratio and weighted cost of capital compared to EKC's proposal. In the 23-EKCE-775-RTS  
13 docket (23-775), Staff proposed an adjustment to the capital structures of each subsidiary  
14 to allocate all the Evergy debt proportionally to each utility's capital structure. In  
15 settlement of the 23-775 rate case, Staff proposed a weighted average cost of capital  
16 (WACC) allocating half of the Evergy debt to EKM and EKC.<sup>1</sup> Staff's position in this  
17 docket and the resulting revenue requirement mirror its settlement position in 23-775. Staff  
18 believes sharing the capital cost reductions adhere to the Commission's policy on capital  
19 structure, is a reasonable outcome under the facts of this case and provides consistency  
20 across these two dockets and the Kansas portion of Evergy's operations. If the Commission

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<sup>1</sup> Testimony in Support of Unanimous Settlement Agreement Prepared by Justin Grady; Docket 23-EKCE-775-RTS; Filed October 3, 2023; pp.38-39.

1 disagrees with Staff's position and wishes to use all the Evergy debt in the allocation, I  
2 present an alternative WACC similar to Staff's filed testimony in the 23-775 docket.

3 Staff's allocation of the holding company debt aligns the Commission's capital structure  
4 policy with the unique factual background of this docket. Staff makes this adjustment to  
5 ensure that consumers receive benefits from the long-term debt held by the holding  
6 company (Evergy Debt) that consumers are paying for both directly and indirectly. The  
7 rating agencies review the risk of the corporate group (Evergy and its subsidiaries) to  
8 determine a group rating. The group rating is used to determine EKC's rating. This link  
9 between the parent and subsidiary ratings is essential because the consolidated entity,  
10 which includes the Evergy Debt, affects the ratings of EKC and EKS. The group credit  
11 rating directly affects the cost of new debt issued by EKM and EKC, which are costs borne  
12 by consumers. At the same time, the existence of the Evergy Debt limits the financial  
13 flexibility of EKC and EKS because there are limits to the amount of debt a utility can  
14 service. Under the Applicants' proposal, customers would be paying the costs of this debt  
15 (both directly and indirectly) without receiving the benefits of that lower-cost capital in the  
16 ROR used to determine a revenue requirement.

17 The third component in the ROR calculation is the ROE, or the allowed return on the equity  
18 component of the capital structure. In the context of rate cases before this Commission,  
19 Staff defines ROE as the allowed return set by the Commission on the equity capital  
20 component of the utility's capital structure. Staff develops its recommended ROE by  
21 establishing a range of reasonable returns and selecting a specific point within that range  
22 to incorporate in the revenue requirement calculation. Unlike the embedded cost of debt,

1       which is a calculation that results in a particular rate, the ROE is an estimate informed by  
2       Staff's application financial models, observations of capital markets and returns granted to  
3       utilities by other commissions. The ROE is best defined as a range, but setting utility rates  
4       demands a singular revenue requirement, and that calculation can only be accomplished  
5       using a point within that range. I recommend an allowed ROE of 9.70% for EKC's revenue  
6       requirement. If the Commission sets the ROE at a different point, my analysis supports  
7       staying within the range of 9.30% to 9.95%.

8       Staff's allowed ROE of 9.70% reflects the changes observed from EKC's last rate case.  
9       Notably the higher capital costs indicated by the DCF models and the increase of the beta  
10      coefficients for electric utilities. The lower bounds of 9.30% is the allowed return Staff  
11      recommended in the previous Evergy rate cases and equates to a risk premium of 335 basis  
12      points, a risk premium comparable that observed in the 23-775 docket. The current capital  
13      market data supports an allowed ROE greater than was appropriate in EKC's last dockets.  
14      The upper bounds of 9.95% reflects a risk premium of 400 basis points over the observed  
15      yield on Baa corporate bonds consistent with the average risk premium on Commission  
16      determined allowed ROEs. These components result in an ROR of 7.01%.

**Staff Proposed Rate of Return for Evergy Central  
Based on Section 7 Updated to March 31, 2025  
& Allocation of Evergy Debt**

	Weight	Cost	Weighted Cost
Long-term Debt	44.91%	4.38%	1.97%
Proportion of Evergy Debt	6.36%	5.03%	0.32%
Common Equity	48.74%	9.70%	4.73%
			7.01%

Sources: KCC DR Sec 7 Updated to March 31, 2025 via KCC DR 192 & 193s

This compares to EKC's request in Section 7 for an ROR of 7.69% based on a ROE of 10.50%.

**Evergy Central Electric Utility  
Rate of Return in Section 7 of Application - As Filed  
Projected to March 31, 2025**

	Weight	Cost	Weighted Cost
Long-term Debt	48.03%	4.64%	2.23%
Common Equity	51.97%	10.50%	5.46%
			7.69%

Source: Section 7

My recommendation of 9.70% ROE is based on current capital market data and an evaluation of previous Commission decisions. To measure the current capital markets, I relied on well-accepted financial models and inputs to those models consistent with those used in past rate cases before this Commission. The results of my analysis are in the following table.



<b>Summary of Staff's Cost of Equity Estimates 25-EKCE-294-RTS</b>			
<b>Discounted Cash Flow Analyses</b>	<b>Mean</b>	<b>Low</b>	<b>High</b>
Two-Stage Growth DCF Model: Based on the Average of Short-Term Growth Forecasts & Long-Term nGDP Forecasts	9.02%	8.69%	9.35%
Internal Rate of Return or Multi-Stage DCF Analysis: Using Short-Term Growth EPS Growth & Long-Term nGDP Forecast	8.42%	7.71%	10.41%
<b>Capital Asset Pricing Models</b>			
Based on Historical Return Data, gathered from 1928 - 2022, Reported at Damodaran On-Line			
Historic Arithmetic Returns	11.01%	9.97%	12.39%
Historic Geometric Returns	9.60%	8.80%	10.68%
Based on Forecasted Return Data:			
J.P. Morgan Asset Management	6.66%	6.20%	7.27%
BlackRock	7.22%	6.69%	7.94%
Kroll Forecasted Risk Premium	9.73%	8.91%	10.83%

A ROE estimate is based on a range we can only estimate using financial models. We do not have the luxury of being able to rely on a single model to pinpoint the cost of equity for a regulated utility. Practically, it is necessary to pick a specific point within that range of reasonable estimates to calculate a revenue requirement used to set rates. I applied a holistic view of my discounted cash flow (DCF) analysis, capital asset pricing model (CAPM) analysis, and observations of the debt and equity capital markets to establish the range. Staff believes it is essential that its recommendations embody a level of consistency across rate cases and reflect changes in the capital markets. Staff's recommendation is mindful of the returns granted to electric utilities nationwide and that these national averages are not filtered for the risk of the underlying utilities relative to EKC; they provide a broad look at allowed returns. Tables in the following pages highlight Staff's past recommendations, the Commission's decisions, and national averages.

Since the 2008 Financial Crisis, jurisdictional utilities have had their ROEs set by this

Commission that resulted in an average risk premium over the reported yield of Baa rated corporate bonds of about 400 basis points, thus providing shareholders an opportunity to earn a return on the equity capital that is considerably greater than the required return on long-term debt of similarly situated utilities. The risk premiums from Commission decisions vary, and as interest rates declined, the premium grew larger. That same observation is apparent nationally in Commission-determined ROEs.

Commission Determined, Allowed ROEs -- Kansas Utilities 25-EKCE-294-RTS						
Company	Docket	Order Date	Requested ROE	Ordered ROE	Baa/BBB Corp Bond Yield	Risk Premium
Atmos Energy Corp.	19-ATMG-525-RTS	2/24/2020	10.25%	9.10%	3.51%	5.59%
Kansas City Power & Light	15-KCPE-116-RTS	9/10/2015	10.30%	9.30%	5.44%	3.86%
Atmos Energy Corp.	14-ATMG-320-RTS	9/4/2014	10.53%	9.10%	4.70%	4.40%
Kansas City Power & Light	12-KCPE-764-RTS	12/13/2012	10.40%	9.50%	4.66%	4.84%
Kansas City Power & Light	10-KCPE-415-RTS	11/22/2010	10.75%	10.00%	5.94%	4.06%
Westar Energy Inc.	05-WSSE-981-RTS	12/28/2005	11.50%	10.00%	6.35%	3.65%
Westar Energy Inc.	01-WSRE-436-RTS	7/25/2001	12.75%	11.02%	7.78%	3.24%
Kansas Gas Service Co.	193,305-U	4/15/1996	12.00%	10.50%	8.19%	2.31%
Average						3.99%
Sources: S&P Capital IQ, reports on Kansas rate cases						
Moody's Seasoned Baa Corporate Bond Yield, Percent, Daily, Not Seasonally Adjusted; <a href="https://fred.stlouisfed.org">https://fred.stlouisfed.org</a>						

The following table shows the history of Staff recommendations and Commission decisions on ROE. Staff's recommendations have remained consistently below 10.00% since early 2010. Commission decisions on ROE have remained below 10.00% since 2012.

Risk Premium of Recent Electric and Gas Dockets						
					*Baa Corporate	
Docket	Testimony Date	Company	Equity Ratio	Staff Recmmd	Bond Yld.	Resulting Rp
14-BHCG-502-RTS	9/12/2014	Black Hills-Ks Gas	50.34%	9.00%	4.89%	4.11%
15-KCPE-116-RTS	5/11/2015	Kansas City Power & Light	50.48%	9.25%	4.94%	4.31%
15-WSEE-115-RTS	7/9/2015	Westar Energy	53.12%	9.25%	5.20%	4.05%
16-KGSG-491-RTS	9/7/2016	Kansas Gas Service	55.00%	8.75%	4.19%	4.56%
16-ATMG-079-RTS	12/21/2016	Atmos Energy	56.12%	9.10%	4.81%	4.29%
18-KCPE-095-MER	1/29/2018	Kansas City Power & Light	*	9.30%	4.29%	5.01%
18-WSEE-328-RTS	6/11/2018	Westar Energy	51.24%	9.30%	4.85%	4.45%
18-KCPE-480-RTS	9/12/2018	Kansas City Power & Light	49.09%	9.30%	4.86%	4.44%
18-KGSG-560-RTS	10/29/2018	Kansas Gas Service	55.00%	9.15%	5.10%	4.05%
19-EPDE-223-RTS	5/13/2019	Empire District Electric Co	51.65%	9.30%	4.65%	4.65%
19-ATMG-525-RTS	10/31/2019	Atmos Energy	56.32%	9.10%	3.87%	5.23%
21-BHCG-418-RTS	9/10/2021	Black Hills Energy	42.96%	9.20%	3.23%	5.97%
23-ATMG-359-RTS	1/17/2023	Atmos Energy	59.16%	9.40%	5.44%	3.96%
23-EKCE-775-RTS	8/29/2023	Evergy, Inc.	48.50%	9.30%	5.96%	3.34%
24-KGSG-610-RTS	7/1/2024	Kansas Gas Service	60.21%	9.60%	6.03%	3.57%
25-BHCG-298-RTS	5/9/2025	Black Hills-Ks Gas	54.60%	9.70%	5.84%	3.86%
Average Risk Premium from Recent Gas & Electric Dockets						4.37%
Median						4.30%
*Moody's Seasoned Baa Corporate Bond Yield [DBAA], retrieved from FRED, Federal Reserve Bank of St. Louis; <a href="https://fred.stlouisfed.org">https://fred.stlouisfed.org</a>						

National data on electric rate cases follow the same trend. Beginning in 2014, the national averages and median for allowed ROEs remained below 10.00%.

This risk premium recognizes the economic reality that the additional risks associated with equity capital mean that stockholders demand a higher return than bondholders. When I prepared this analysis, a 9.70% ROE is a 375 basis point premium over the yield on BBB/Baa rated corporate bond yield. During the first two weeks of May 2025, Evergy Central 5.70% due 2053 bonds yielded about 6.04%, thus comparable to what is observed for Baa rated corporate bonds and a similar level of risk premium.<sup>2</sup>

<sup>2</sup> S&P Capital IQ reported yields to worst; CUSIP 30036FAB7

**Staff's Risk Premium Over Fixed Income Yields  
Based on a 9.70% Allowed ROE  
25-EKCE-294-RTS**

	30 Year (1) Treasury Bond	Corp Bonds (2) Baa
Nov 2024	4.54%	5.78%
Dec 2024	4.58%	5.80%
Jan 2025	4.85%	6.08%
Feb 2025	4.68%	5.92%
Mar 2025	4.60%	5.93%
Apr 2025	4.71%	6.18%
	4.66%	5.95%
KCC Staff's Recommended ROE		9.70%
Average Yield on 30 Year Treasury Bond		4.66%
<b>Equity Risk Premium Over the 30-Year Treasury Bond Yield</b>		<b>5.04%</b>
KCC Staff's Recommended ROE		9.70%
Average Yield on "Baa" Rated Corporate Bonds		5.95%
<b>Equity Risk Premium Over "Baa" Corporate Bond Yield</b>		<b>3.75%</b>

1) Board of Governors of the Federal Reserve System, 30-Year Treasury Constant Maturity  
(Federal Reserve Bank of St. Louis, [www.https://fred.stlouisfed.org](https://fred.stlouisfed.org))

2) Yield on Moody's Seasoned Baa rated Corporate Bonds;  
(Federal Reserve Bank of St. Louis, [www.https://fred.stlouisfed.org](https://fred.stlouisfed.org))

**Q. Do you have an estimate of the dollar impact of your adjustments on the revenue requirements requested by EKC?**

**A.** Based on Staff's revenue requirement model with Staff's adjustments to rate base and expenses, the estimated the dollar value of Staff's ROR scenarios are as follows.

- Staff's primary position of using a 9.70% allowed ROE and allocating half of Evergy's corporate debt to subsidiaries reduces the revenue requirement by \$50.48 million.
- Isolating Staff's 9.70% allowed ROE in place of EKC's requested 10.50% reduces the revenue requirement by \$35.76 million.

- Staff's alternative position of using a 9.70% allowed ROE and allocating all of Evergy's corporate debt to subsidiaries reduces the revenue requirement by \$63.80 million.

### **Applicants**

#### **Q. Who is the Applicant in this Docket?**

A. The revenue requirement in this docket is that of Evergy Kansas Central (EKC) and its subsidiary, Evergy Kansas South (EKS). EKC is formerly known as Westar Energy, which includes the Evergy Kansas South service territory formerly known as Kansas Gas & Electric. I have reviewed the corporate descriptions provided in the SEC Form 10-K and contained in the Application and generally agree with the discussion in those documents.

### **Macro-Economic Environment & Investor Expectations**

#### **Q. Is it necessary for the Commission to create a forecast for the broad economy to determine a reasonable return?**

A. As set forth in the written testimony I filed in a number of other rate cases, I advised the Commission that determining a fair and reasonable allowed return does not require it to make an independent forecast of the economy's future or even adopt a specific perspective on the economy's direction. The focus of setting a fair and reasonable allowed return is on the *investors'* required return, which is a product of the *investors'* expectations for the economy (not the Commissioners'). Investors' expectations for the economy are captured within the Commission's cost of capital decision, provided the Commission's decision is based on market-derived data such as current stock prices, interest rates, and other market

1 data that conveys investors' outlook for the economy. Staff's recommendation is based on  
2 current market-derived data, the same data that investors rely on for their decisions. It is  
3 unnecessary and counterproductive for regulators and cost of capital witnesses to second-  
4 guess the capital markets. It is a well-accepted premise that our capital markets are  
5 efficient, where investors factor all available information into their decisions to buy and  
6 sell debt and equity securities. Furthermore, rational, profit-maximizing investors are  
7 forward-looking. Accordingly, investors incorporate their forecasts of the economy into  
8 their decisions in their best attempt to maximize returns.

9 **Q. Do you believe the Commission benefits from some discussion of the economic**  
10 **forecast when setting allowed returns?**

11 A. Yes, particularly with the global events beginning five years ago with the Covid-19  
12 pandemic, followed by the Russian/Ukrainian war, and recent months with uncertainty  
13 surrounding traditional global trade patterns and tariffs. The economic issues facing  
14 governments and their central banks relate to the fallout from these international events,  
15 which have caused disruptions of long-established global supply chains and trade patterns;  
16 disruptions that reduced economic growth, spiked inflation rates, and increased economic  
17 uncertainty.

18 Equity and fixed-income investors watch the actions of the Federal Reserve Open Market  
19 Committee (FOMC) of the U.S. Federal Reserve Board (Fed) closely, more so than any  
20 other published report on the U.S. economy. The opinions of the FOMC members and  
21 staff economists are published weeks after each meeting, and as of the recent meetings in  
22 December of 2024, January of 2025, and March of 2025, the Federal Reserve members'

1 economic perspective reflects cautious optimism amid ongoing inflationary pressures and  
2 a slowing, but resilient economy as summarized in their views on inflation, growth and  
3 unemployment. The following were the FOMC members' views before April 2, 2025, and  
4 the announcements on newly enacted tariffs.

- 5 • **Inflation:** The Fed remains focused on bringing inflation down to its 2% target.<sup>3</sup>  
6 While inflation has moderated from the highs of 2022, it continues to be above the  
7 2% target, but members expect to reach the 2% target in 2027.<sup>4</sup> The FOMC  
8 recognizes the need for careful monitoring of price pressures, particularly as  
9 demand in the economy remains relatively strong. In previous meetings, some  
10 members noted that the disinflationary process may have stalled temporarily. At  
11 all three meetings, they highlighted the risk that returning to target levels could take  
12 longer than anticipated.<sup>5</sup> At its March meeting, more members expressed increased  
13 uncertainty about their inflation forecasts and increased risks weighted to higher  
14 inflation.<sup>6</sup>
- 15 • **Economic Growth:** U.S. economic growth has slowed but remains positive and  
16 solid. The long-run forecast for 1.8% real growth remains in place. However, at  
17 its March meeting, more members expressed increased uncertainty about their  
18 growth forecasts and increased risks weighted to lower growth.<sup>7</sup>
- 19 • **Labor Market:** Participants noted the job market is solid, though showing signs of  
20 cooling, with job growth slowing and the unemployment rate remaining low. At  
21 the March meeting, the forecasted unemployment rate remained at 4.2 over the long  
22 run, but with a greater risk of higher unemployment rates than in previous  
23 meetings.<sup>8</sup>
- 24 • **Monetary Policy Decision:** At its December meeting, the Committee voted in  
25 favor of the rate cut to 4.25 to 4.50%.<sup>9</sup> At the January 2025 and March 2025  
26 meetings, members voted to maintain the federal funds rate at 4.25% to 4.50%.
- 27 • **Long-run Targets:** In all four recent meetings, the FOMC members' long-run  
28 targets are for a return of pre-pandemic inflation levels at 2.00% annually, real GDP  
29 at an annual growth of 1.80%, and unemployment at 4.20%.

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<sup>3</sup> Minutes of the Federal Open Market Committee, November 6, 2024; p.12

<sup>4</sup> Minutes of the Federal Open Market Committee, March 19, 2025; table 1.

<sup>5</sup> Minutes of the Federal Open Market Committee of its December 17-18, 2024, Meeting; Released January 8, 2025.

<sup>6</sup> Minutes of the Federal Open Market Committee, March 19, 2025; table 4.C.

<sup>7</sup> Minutes of the Federal Open Market Committee, March 19, 2025; table 4.A.

<sup>8</sup> Minutes of the Federal Open Market Committee, March 19, 2025; table 4.B.

<sup>9</sup> Minutes of the Federal Open Market Committee of its December 17-18, 2024, Meeting; Released January 8, 2025.

- **Policy Risk:** The primary distinction between the FOMC projections materials published after the March 2025 meeting and that published from the three prior meetings is increased levels of risk to all projections.<sup>10</sup>

Immediately following FOMC meetings, it issues a one-page press release summarizing findings from the multi-day meeting, with detailed minutes published three weeks later. The summary of the FOMC meeting of May 2025 reflects a higher degree of caution relative to the notes from the previous three meetings discussed above and a higher degree of uncertainty around the economy. A key difference from prior meetings is the view that risks for higher inflation *and* slower economic growth have increased quickly since the previous meetings. In March 2025, FOMC members judged the risks of attaining their dual-mandate objective as increased since the meeting in January 2025, but that risk was of failing to meet one of the two dual-mandate objectives; now the FOMC members view the risk as a failure to meet both objectives of the dual mandate.<sup>11</sup>

**Q. Does the risk of persistent inflation demand that the Commission provide a utility with a premium or risk adder to compensate investors?**

A. No, having experienced a brief, severe recession related to a global pandemic, supply chain disruptions caused by the worldwide pandemic and war in Europe, and several quarters of high inflation, as well as lingering levels of inflation well above the FOMC's 2.0% target, investors are aware of the risks potential inflation poses to corporate profits and the broad economy. We know that financial markets are efficient, and investors constantly assess and reassess these risks and price securities; accordingly, those prices are inputs to the

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<sup>10</sup> <https://www.federalreserve.gov/monetarypolicy/fomcprojtabl20250319.htm>

<sup>11</sup> Federal Reserve issues FOMC statement, March 19, 2025.



1 CAPM and DCF analyses. Thus, these risks and the changes they cause in utility stock  
2 prices and interest rates are captured in my study of the proxy group, and no explicit  
3 adjustment is warranted. Relying on current data captures investors' required return for  
4 putting their capital at risk. In my analysis of capital markets for this docket, I encountered  
5 no meaningful argument suggesting that the capital markets are not working efficiently,  
6 even though recent trading patterns appear volatile relative to historical norms.

### **Capital Structure & Cost of Debt**

7 **Q. Does Staff agree with the cost of debt contained in Section 7 of the Application?**

8 A. No, Staff proposes to use a post-test year update to Section 7 to capture the cost of debt as  
9 of March 31, 2025. The updates are in response to KCC DR-192. Geoffrey Ley sponsors  
10 Evergy's cost of debt and his testimony proposes a pro-form cost of debt that goes well  
11 beyond the test year. Staff recommends a rejection of those proforma adjustments  
12 submitted in the Application because that data is not known and measurable. As explained  
13 by Mr. Ley, Mr. Ives, and Ms. Bulkley, EKC proposes a pro-forma capital structure of  
14 51.97% equity and 48.03% long-term debt on June 30, 2025.

15 **Q. Do Staff and Evergy agree on the capital structure to be used in calculating EKC's**  
16 **revenue requirements?**

17 A. No. Staff does not agree with EKC's capital structure methodology for setting the revenue  
18 requirement. It is Staff's contention that EKC's approach is inconsistent with established  
19 Commission policy that the Commission reiterated in its Docket No. 16-KCPE-593-ACQ  
20 (16-593 Docket) Order, which determines a revenue requirement based on the "...capital

1 structure that will result in the lowest overall cost of capital that is representative of utility  
2 operations.”<sup>12</sup> Staff is committed to applying the Commission’s established policy, and  
3 the Applicants have not provided any basis for departing from that established policy.  
4 Staff’s revenue requirement seeks to share those benefits between shareholders and  
5 ratepayers, as opposed to EKC’s proposed revenue requirement, which retains all those  
6 benefits for Evergy’s shareholders.

7 The Applicants’ proposals allow Evergy’s shareholders to be the sole beneficiaries of \$2.7  
8 billion of debt issued by Evergy (Evergy Debt), the holding company of EKC. Although  
9 that debt is a factor in determining the credit ratings of EKS, EKC, and Evergy, only Evergy  
10 shareholders would receive the financial benefits from that leverage under EKC’s proposal.  
11 Credit ratings are a critical factor for determining the interest rate of new debt issued by  
12 the EKC and EKS, becoming part of the costs charged to consumers. In this instance,  
13 leaving the holding company debt out of the revenue requirement calculations, as the  
14 Applicants propose, would burden consumers with rates calculated using a revenue  
15 requirement based on a higher equity ratio. Equity capital is riskier than debt, thus  
16 demanding a higher cost and recovery of related income tax expenses that are not  
17 applicable to debt financing. Staff contends that ratepayers should share in the benefits of  
18 the Evergy Debt along with Evergy’s shareholders.

19 **Q. Is it Staff’s view that the Commission should closely examine how shareholders**  
20 **finance their common equity holdings in Kansas utilities?**

21 **A.** Absolutely not. A holding company’s ownership of equity of a public utility is

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<sup>12</sup> 16-KCPE-593-ACQ Order, April 19, 2017, para 90, footnote 228.

distinguishable from an investor owning common stock in a utility; the holding company takes on responsibilities far greater than those shouldered by stockholders. Evergy agreed to supply its electric utility subsidiaries with sufficient capital, and the Commission has the authority to compel Evergy to fulfill that responsibility. Stockholders of utility companies do not have that responsibility, and they can increase or decrease their level of investment unilaterally, without obtaining authority from regulators. The holding company as owner of a public utility is unique from other equity investors; there is a greater level of regulatory oversight that comes with Evergy's absolute control over all aspects of a public utility; the appropriate capital structure to use in setting the utility's revenue requirement is part of that oversight. The situation of a holding company, like Evergy, is unique from that of any other equity investor.

**Q. What is the capital structure Evergy uses to calculate the revenue requirement for EKC?**

A. Geoffrey T. Ley sponsors the capital structure shown in Exhibits GTL-1 & 2. The Applicants present projected capitalization data based on the test year as of June 30, 2024, and a proforma of capitalization as of June 30, 2025.<sup>13</sup>

Evergy Kansas Central Electric Utility

Capital Structure and Rate of Return

Projected March 31, 2025

Summary

	Balance	Weight	Rate	Rate of Return
Long-term Debt*	4,933,231,986	48.03%	4.641%	2.229%
Common Equity	5,337,669,012	51.97%	10.500%	5.457%
<b>Total Capitalization</b>	<b>10,270,900,998</b>	<b>100.00%</b>		<b>7.686%</b>

\*Includes unamortized debt expenses and discounts. Excludes current maturities of long-term debt of which there is \$250 million due in December 2025 (per adjustment in row 58 below).

<sup>13</sup> The Application cites the EKC capital structures at June 30, 2024, shown in Exhibit GTL-2 and forecasted as of March 31, 2025, shown in Errata Exhibit GTL-2. KCC DR-192 updates the capital structure balances to reflect March 31, 2025, actual balances.

**Q. How did Staff determine the capital structure for EKC?**

A. Staff's capital structures for EKC incorporate a proportional share of the Evergy Debt based on their proportion of net property plant and equipment of Evergy.

Allocation of Evergy, Inc. Holding Company Debt Based on Net Property Plant & Equipment (\$'s in millions)				
Net PP&E	2024 FQ4	2024 FQ3	2024 FQ2	2024 FQ1
Evergy, Inc	\$ 24,931	\$ 24,613	\$ 24,301	\$ 23,946
Evergy Central	\$ 12,880	\$ 12,655	\$ 12,442	\$ 12,245
<b>Evergy Central</b>	<b>51.7%</b>	<b>51.4%</b>	<b>51.2%</b>	<b>51.1%</b>
Source: S&P Capital IQ Pro				

Based on reported net property plant & equipment at December 31, 2024, Staff would allocate EKC 51% of the Evergy Debt.<sup>14</sup> To be consistent with Staff's position in the 23-775 Docket settlement and consistent with the revenue requirement in place for Evergy Kansas Metro, Staff is allocating half of that amount to EKC or roughly 26% of the total.

Holding Co Debt Assigned to Operating Companies			
EKC	51.7%	\$	1,394,906,321
<b>Staff 50% Allocation</b>	<b>50.0%</b>	<b>\$</b>	<b>697,453,161</b>

The Evergy Debt consists of senior notes, junior subordinated notes, and convertible bonds with an embedded cost of 5.023%.<sup>15</sup> With an update to EKC Section 7 to reflect actual balances at March 31, 2025, along with the 26% proportional share of Evergy Debt and

<sup>14</sup> Staff relies on 2024 year-end balances because March 31, 2025, balances were not available at the time of Staff's analysis.

<sup>15</sup> KCC DR 192; 25-EKCE-294-RTS.

Staff's cost of equity, Staff recommends the following rate of returns.

<b>Staff Proposed Rate of Return for Evergy Central Based on Section 7 Updated to March 31, 2025 &amp; Allocation of Evergy Debt</b>			
	Weight	Cost	Weighted Cost
Long-term Debt	44.94%	4.38%	1.97%
Proportion of Evergy Debt	6.36%	5.03%	0.32%
Common Equity	48.70%	9.70%	4.72%
			7.01%
Sources: KCC DR Sec 7 Updated to March 31, 2025 via KCC DR 192 & 193			

Staff does not claim that its methodology is the only means to share the benefits stemming from the leverage of the Evergy Debt; there are other means to accomplish the same goal.<sup>16</sup> Staff's methodology is clear and reasonable as it recognizes the existing debt costs of EKC and EKS, much of which occurred prior to the holding company, as well as reflecting the benefits to EKS's and EKC's ratepayers of the Evergy Debt, relative to the size of their rate base.

**Q. Does the Evergy Debt and Evergy's credit profile affect the credit ratings of EKC?**

A. Yes, in the case of Evergy and its subsidiaries, rating agencies view the risk of the corporate group - that is, the parent and its subsidiaries - to determine a group rating. That group rating is the rating assigned to the subsidiaries, even though the rating agencies determine the standalone rating of an Evergy subsidiary to be higher than the group rating. This link

<sup>16</sup> An alternative methodology used by the Commission relies on the consolidated capital structure and consolidated weighted average cost of debt for the utility rate of return calculation.

1 between the parent and subsidiary ratings is critical because the consolidated entity, which  
2 includes the debt at Evergy, affects the ratings of EKC and EKS. The group credit rating  
3 affects EKC's and EKS' credit ratings and therefore, the cost of debt they issue. The  
4 existence of the Evergy Debt limits the subsidiaries' financial flexibility because there are  
5 limits to the amount of debt a utility can incur without jeopardizing the current rating.

6 **Q. What is the basis for your conclusion that rating agencies consider the ratings of the**  
7 **group (parent and subsidiaries collectively) when assigning an individual rating to**  
8 **the subsidiaries?**

9 A. That group relationship is apparent from Standard & Poor's (S&P) comments on group  
10 influence ratings of Evergy and EKC. (BEGIN CONFIDENTIAL)

11 \*

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]

18 [REDACTED]  
19 [REDACTED]

20 [REDACTED]

21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]

25 [REDACTED]  
26 [REDACTED]

27 [REDACTED]

<sup>17</sup> Evergy Kansas Central; S&P Global Ratings Direct; December 16, 2024; p.7 (CURB-13, Confidential)

<sup>18</sup> Evergy Kansas Central; S&P Global Ratings Direct; December 16, 2024; p. 2 (CURB-13, Confidential)

END CONFIDENTIAL\*

The following is from a public document published by Moody's Investor Services describing its methodology for ratings within a utility family. Moody's methodology states that ratings of individual entities within a family can be pulled up or down due to interrelationships within the family.

In our analysis, we generally consider the stand-alone credit profile of an OpCo and the credit profile of its ultimate parent HoldCo (and any intermediate HoldCos), as well as the profile of the family as a whole, while acknowledging that these elements can have cross-family credit implications in varying degrees, principally based on the regulatory framework of the OpCos and financing model (which has often developed in response to the regulatory framework)."

"In addition to considering individual OpCos under this (or another applicable) methodology, we typically approach a HoldCo rating by assessing the qualitative and quantitative factors in this methodology for the consolidated entity and each of its utility subsidiaries. Ratings of individual entities in the issuer family may be pulled up or down based on the interrelationship among the companies in the family and their relative credit strength.<sup>21</sup>

Everygy Debt plays a role in the subsidiaries' bond ratings, influencing the interest rate of bonds issued by the subsidiaries. Consumers who are paying costs should share the

<sup>19</sup> Everygy Inc.; S&P Global Ratings Direct; November 29, 2023; p. 8 (CURB-13, Confidential)

<sup>20</sup> Everygy Inc.; Moody's Investor Services Credit Opinion; June 13, 2024; p.1 (CURB-13, Confidential)

<sup>21</sup> Regulated Electric and Gas Utilities; Moody's Investor Services, Rating Methodology; August 6, 2024; p. 23 (publicly available at [www.moodys.com](http://www.moodys.com) or <https://ratings.moodys.com/rmc-documents/426183> )

benefits of that leverage. It is unreasonable to allocate all those benefits to Evergy's shareholders as EKC proposes.

**Q. Does EKC acknowledge that Evergy can affect their credit ratings?**

A. EKC advises bond investors that the credit ratings of their bonds could change because of events directly affecting Evergy and its other subsidiaries, even though Evergy does not guarantee the bonds.<sup>22</sup>

**Q. Under Staff's proposed capital structure, do consumers receive all the benefits afforded by the additional leverage?**

A. No. Staff's capital structure adjustment effectively shares the benefits of the leverage between shareholders and ratepayers. Applying Staff's methodology allocates a portion of the Evergy Debt to EKC consumers, while the remaining Evergy Debt (including the portion attributable to Missouri utility operations) continues to benefit shareholders.

**Q. Has Staff proposed similar adjustments to capital structure in past dockets?**

A. Yes, it was an issue that I addressed during the 16-593 and 18-095 merger proceedings. The relevant page of my Direct Testimony in 18-095 follows, stating that Staff views using a consolidated capital structure as a tool in protecting the utilities' financial health.<sup>23</sup>

**Q. Beyond these commitments and financial conditions, in Staff's view, what is the Commission's key means of protecting the financial health**

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<sup>22</sup> SEC Form 424(b)(2), Evergy Kansas Central, Inc., Mortgage Bonds Series 5.70% due 2053; p. S-11; filed March 8, 2023. SEC Form 424(b)(2), Evergy Kansas Central, Inc., Mortgage Bond Series 4.70% due 2028; p. S-13; supplement dated March 6, 2025.

<sup>23</sup> Direct Testimony of Adam H. Gatewood, p. 11; 18-KCPE-095-MER, filed January 29, 2018.



**of the public utility subsidiaries?**

A. In cases such as this, where a holding company owns and controls all aspects of a subsidiary utility company, I believe regulators can best protect the financial health of the utility by consistently relying on the lowest cost capital structure to determine the utility's revenue requirement. This has proven to be effective because decision makers at the holding company know that the utility's revenue requirement will recover only the cost of providing capital to the utility thus removing the incentive for the holding company to manipulate the subsidiary's capitalization ratios. This has been Staff's position for the past twenty years and is well supported by foundational texts on public utility rates as an appropriate methodology for assessing the capitalization of a regulated utility.<sup>24</sup>

I raised this topic in the 18-095 Docket because it was an issue central to Staff's objection to the merger proposed in 16-593. The position I espoused in the 16-593 Docket applies to determining the capital structure in this rate case.<sup>25</sup>

*A. Policy of using consolidated capital structure is reasonable and within the Commission's discretion*

**Q. Why do you believe it is reasonable to set rates using the consolidated capital structure and cost of debt?**

A. In situations where we set rates for a utility that is a wholly owned subsidiary, we carefully review the capitalization of the subsidiary, as well as the capitalization of the parent company. For the purpose of determining the weighted average cost of capital or allowed rate of return, we will rely on the capitalization that results in the lowest weighted average cost of capital. Thus, if the parent company exhibits a higher debt ratio than the subsidiary, we will use the parent company's capital ratios to calculate the revenue requirement.

Staff believes this approach is reasonable because it recognizes the reality of the parent company's absolute control over the operations of the subsidiary. Credit rating agencies also recognize the control and interrelated nature in that they will only allow a couple of notches difference between a parent and subsidiary. They recognize that a weakness in either will drag on the credit worthiness of the other. There will be very little separation between GPE and its subsidiaries,

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<sup>24</sup> Principles of Public Utility Rates (2<sup>nd</sup> ed), Bonebright, J, et al., pp. 306-311 (1988).

<sup>25</sup> Direct Testimony of Adam H. Gatewood, 16-KCPE-593-ACQ; pp. 40-41; filed December 16, 2016.

1 as GPE and each of its subsidiaries will have the same board of  
2 directors, who in turn set the dividend and capitalization policies of  
3 the parent and the subsidiaries. Staff has made its position clear  
4 through testimony filed in past rate cases, and this Commission has  
5 through orders it issued, that the consolidated capitalization is  
6 reviewed and could be used to set rates. In Staff's view, this is a  
7 reasonable means to reduce or eliminate incentives to manipulate  
8 subsidiary capital structure solely for the benefit of stockholders.  
9 Staff's policy recommendation on capital costs simply seeks to treat  
10 capital costs like all other parent-subsidiary transactions and applies  
11 an asymmetrical approach. Just as with the parent providing labor or  
12 office space to the subsidiary, the parent should not profit from  
13 providing capital to the subsidiary at a higher cost than it incurred to  
14 obtain the capital. In some sense, recognizing the consolidated capital  
15 structure is a form of ring-fencing.

16 **Q. Has this policy been accepted by the Commission?**

17 A. Yes, it has. I have been on the Utilities Division Staff since 1988. I  
18 have consistently applied this methodology since at least 2000 in  
19 telephone, gas distribution, and electric rate cases, and the  
20 Commission has consistently accepted it. As is discussed extensively  
21 in rate cases, the Courts give regulatory agencies, such as the  
22 Commission, wide latitude to determine a fair rate of return, of which  
23 capital structure and cost of debt are two of the components.

24 **Q. Is Staff's position on EKC's capital structure consistent with the Commission's past**  
25 **practice?**

26 A. Yes, it is consistent with the Commission's past practice of utilizing either the capital  
27 structure of the parent company or that of the utility subsidiary, which results in the lowest  
28 overall cost of capital. The Commission's Order denying the 16-593 merger at paragraph  
29 90 reaffirms that commitment. The associated footnote cites three relevant dockets and  
30 their related Court of Appeals decisions affirming the Commission's decisions that date  
31 back to 2004. Thus, the Commission's policy is not new, especially to the Applicants who  
32 have dealt with this policy in two recent dockets. Paragraph 90,

1 Since the Commission is denying the Joint Application, it is not necessary to  
2 determining the appropriate capital structure for the post-transaction entity.  
3 Nonetheless, the Commission reaffirms its commitment to use a capital  
4 structure that will result in the lowest overall cost of capital that is  
5 representative of utility operations.” (footnote omitted)<sup>26</sup>

6 **Q. To be clear, at paragraph 90 the Commission expressly refers to the “...the lowest**  
7 **overall cost of capital that is representative of utility operations.” Is it Staff’s view**  
8 **that capital held at the parent company meets the principle espoused by the**  
9 **Commission?**

10 A. Yes, because the subsidiaries of Evergy, which include EKS and EKC, depend on it for  
11 financing from the capital markets. Evergy subsidiaries have issued debt, share in a credit  
12 facility agreement with a syndicate of banks, and depend on the parent company to raise  
13 equity capital. \*

14 [REDACTED]

15 [REDACTED]\*<sup>27</sup>

16 Evergy is the only shareholder of EKC. It is difficult to separate the parent from its  
17 subsidiaries because shareholders invest in the public utility operations of the subsidiaries  
18 via ownership in Evergy common stock, and the linkage rating agencies make between the  
19 parent and subsidiary credit ratings. In 2024, Evergy paid shareholders \$597 million in  
20 dividends. Evergy has no means to generate earnings from which it can pay dividends  
21 other than its stock ownership in its electric utilities. Evergy acknowledges in filings with  
22 the Securities and Exchange Commission that cash flow from its subsidiaries is its only

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<sup>26</sup> Order issued April 19, 2017; para 90; 16-KCPE-593-ACQ.

<sup>27</sup> Evergy Kansas Central; S&P Global Ratings Direct; December 16, 2024; p. 4 (CURB-13, Confidential)

means of funding interest payments on its debt.<sup>28</sup> The cash needed to pay dividends and interest by Evergy can only be met by the regulated electric utility subsidiaries, where the sum of the net income of EKC (which includes EKS) and Evergy Metro, Inc. (which is EKM plus the Missouri side of the utility) equates to 98% of Evergy's net income.

**Q. Is the Commission's established policy on using the lowest possible capital structure unique?**

A. The Commission has adopted a policy that addresses issues in Kansas based on the facts presented in cases before it. Simply copying the policies of other commissions or federal regulatory agencies may not serve Kansans well. The policy of applying the lowest cost capital structure is well within the scope of rate-making practices.<sup>29</sup> As noted in footnote 228 of the Commission's 15-593 Order, the Commission's established practice is upheld by the Kansas Court of Appeals in cases that involved wide-ranging, unique factual backgrounds of varied rate of return regulated enterprises. Footnote 228 of the Commission's 15-593 Order reads as follows:

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<sup>228</sup> See *Moundridge Tel. Co. v. Kan. Corp. Comm'n*, No. 114,064, 2015 WL 7693784, at \*16 (Kan. Ct. App. Nov. 25, 2015); *Aquila, Inc. v. Kan. Corp. Comm'n*, No. 94, 326, 2005 WL 1719705, at \*2-3 (Kan. Ct. App. July 22, 2005); *Wheat State Tel. Co. v. Kan. Corp. Comm'n*, No. 91,640, 2004 WL 895534, at \*2 (Kan. Ct. App. Apr. 23, 2004).

Finally, the Applicants have provided no analysis to demonstrate that FERC's capital structure policy cited in Mr. Ives Direct Testimony sufficiently balances the interests of shareholders and Kansas consumers. It would not be reasonable for this Commission to

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<sup>28</sup> SEC Form 424(b)(2), Evergy, Inc., 6.65% Fixed-to-Fixed Reset Rate Junior Subordinated Notes due 2055; Prospectus Supplement dated December 2, 2024; p.S-14.

<sup>29</sup> Principles of Public Utility Rates (2<sup>nd</sup> ed), Bonebright, J. et al; pp, 306-311; 1988.

1 abandon its longstanding policy in favor of a FERC policy that is not balanced and that  
2 may harm Kansas consumers.

**Rebuttal of Evergy's Proposed 10.25% Return on Equity**

3 **Q. What are your primary disagreements with witness Bulkley's ROE**  
4 **recommendations?**

5 A. Staff's disagreements center on three issues that results in Ms. Bulkley's ROE estimates  
6 being well above what is required by investors: 1) relying solely on three to five year  
7 earnings growth forecasts as estimates for long-term growth in her CAPM, empirical  
8 CAPM (eCAPM), and DCF models; 2) creating an unrealistically high forecast of market  
9 returns used in her CAPM and eCAPM analyses; and 3) relying on a risk premium study  
10 does not reflect the risks of EKC and Evergy.

11 **Q. How do Ms. Bulkley's outcomes compare to Staff's recommendation when you**  
12 **address these issues in her analysis?**

13 A. I have two concerns that cause Ms. Bulkley to overestimate the ROE for EKC: 1) her sole  
14 reliance on three-to-five-year earnings growth forecasts to estimate long-run earnings  
15 growth; and 2) her reliance on an expected return in the broad-based equity market of  
16 12.05%. Correcting for these two issues using more realistic inputs lowers the outcomes  
17 and brings her estimates in line with Staff's recommendation.

18 Incorporating long-run nominal GDP (nGDP) growth estimate into her DCF analyses  
19 reduces the results from her constant growth DCF models by 124 basis points from an  
20 average of 10.30% (seen in Exhibit AEB-1) to 9.04%. Substituting forecasted market

returns published by professional, institutional money managers in place of the 12.05% market return estimated by Ms. Bulkley reduces her CAPM results by 219 basis points, from an average of 10.72% to 8.53%.

<b>Staff's Corrections to Exhibit AEB-1 25-EKCE-294-RTS</b>	
<b>Constant Growth DCF</b>	
1) Average of Mean Results	10.39%
Average of Median Results	10.20%
	10.30%
2) KCC Staff Adjustment to Growth Rate to Reflect Long-Term Economic Growth Estimates	-0.0124
Corrected Constant Growth DCF	9.06%
<b>CAPM Results Using Longer-Term Interest Rate Projections</b>	
Current Value Line Beta	11.62%
3) Current Bloomberg Beta	10.39%
Long-term Average Value Line Beta	10.15%
	10.72%
4) KCC Staff Adjustment to Reflect Lower Expected Market Returns by Institutional Money Managers	-2.19%
Corrected CAPM Results	8.53%
1) Constant growth DCF results summarized on Exhibit AEB-1 Averaging DCF analyses using stock prices gathered over 30, 90, and 180 day study periods	
2) Adjustment to reflect long-term nominal GDP growth in DCF model averaging 3 to 5 year earnings growth rate with nGDP	
3) Average of CAPM results summarized on Exhibit AEB-1 Average of three cited sources of beta coefficients incorporating Blue Chip long-term forecast for 30 year Treasury bond yields	
4) Adjustment to reflect 8.0% expected market returns of institutional money managers in place of Applicant's forecast of a 12.00% market return	

### **Reliance on 3 to 5 Year Growth Forecasts Rebuttal**

**Q. Explain your disagreement with Ms. Bulkley's reliance on three to five year earnings growth forecasts.**

1 A. Ms. Bulkley's market return estimates do not reflect investors' expectations of returns from  
2 the equity market. For inputs to the CAPM and DCF models, Ms. Bulkley relies on three-  
3 to five-year forecasts, despite the CAPM and DCF models' explicit requirements for long-  
4 term perspectives well beyond three to five years. As I discuss in the DCF section of my  
5 analysis, the DCF model in the form that Ms. Bulkley and I use depends on a growth  
6 estimate that continue in perpetuity because equity capital has an infinite life span.<sup>30</sup>  
7 Investors incorporate long-run growth forecasts in their valuation analyses, while Ms.  
8 Bulkley's analyses assume three-to-five-year earnings growth rates continue in perpetuity.  
9 The problem is that three-to-five-year growth rates are higher than investors expect to  
10 continue in the long run. Using these short-term growth rates as a surrogate for long-term  
11 growth, as Ms. Bulkley has done in her analyses, results in her eCAPM, CAPM, and DCF  
12 models overstating the required ROE estimates for the entities in her proxy group.

13 Later in my testimony I discuss how investors capture a longer-term perspective of earnings  
14 growth. Ms. Bulkley's three-to-five-year earnings growth forecasts are above the expected  
15 growth rate of the aggregate economy and therefore cannot be expected to continue in the  
16 long run. Ms. Bulkley's DCF analyses incorporate an average three-to-five-year earnings  
17 growth forecast of 6.56%, about 250 basis points above the long-run growth for the U.S.  
18 nominal GDP of 4.09%. Recognizing long-term growth in the economy in the analysis  
19 with a fifty percent weighting with the three-to-five-year growth estimates reduces the DCF  
20 calculations by 124 basis points. As I discussed later in my testimony, there is a link  
21 between economic growth of the broader economy and expected long-term returns for

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<sup>30</sup> The Cost of Capital Practitioner's Guide; David C. Parcell; p. 8-6; 1997 Edition.

1 equity investments; thus, it is reasonable to assume investors incorporate long-run  
2 economic growth assumptions in their investment decisions.<sup>31</sup> Cost of capital witnesses  
3 and institutional investors informed FERC that they view inclusion of a long-term  
4 perspective for growth as critical in valuing equity investment.<sup>32</sup> Respected treatises on  
5 investment valuation incorporate broad measures of long-run economic growth as suitable  
6 surrogates for long-run corporate earnings growth.<sup>33</sup> As conservative as that sounds, some  
7 institutional investors view even nominal GDP (nGDP) growth as an overly generous  
8 forecast for long-run growth in earnings and dividends of mature companies.<sup>34</sup> My  
9 objection to Ms. Bulkley's use of short-run, three-to-five-year earnings growth forecasts is  
10 based on her failure to temper those short-run growth forecasts with a long-term  
11 perspective of broad economic growth.

12 The effects of her sole reliance on three-to-five-year earnings growth estimates are less  
13 obvious, but far more significant in Ms. Bulkley's CAPM analyses and causes a significant  
14 upward bias in her recommendation. Within her CAPM analyses, she calculates an  
15 anticipated market return on the broad equity market index using the S&P 500 Index  
16 (SP500). Her DCF analyses on *selected* members of the SP500 lead her to conclude that  
17 investors can expect to realize annual returns of 12.05% in the future. Her 12.05%  
18 forecasted return on the market is based on *her* estimate of *10.51% annual earnings growth*  
19 for the SP500. The difference between market returns forecasted by Ms. Bulkley and those

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<sup>31</sup> Linking GDP Growth and Equity Returns, Monthly Insights from the Office of the Chairman, Goldman Sachs Asset Management, Jim O'Neill; May 2011.

<sup>32</sup> FERC Opinion 396-B, pp 10-11.

<sup>33</sup> Graham and Dodd's Security Analysis; Cottle, Murray, and Block; pp.572-574; 5<sup>th</sup> ed.

<sup>34</sup> Earnings Growth: The Two Percent Dilution; William J. Bernstein and Robert D. Arnott; Financial Analysts Journal; September/October 2003; p 47.



1 forecasted by the professional money managers is inconsistent and overstated because she  
 2 assumes a higher rate of growth than has been experienced in the past and projected by the  
 3 Federal Reserve. For example, the following table contains the forecasted market returns  
 4 that Staff used in its CAPM analyses, with an average of 8.98% *or more than 300 basis*  
 5 *points lower* than Ms. Bulkley's personal forecast.

<b>Market Returns Forecasted by            Institutional Money Managers            25-EKCE-294-RTS</b>		
J.P. Morgan Asset Management		
	Arithmetic Return Estimate	8.21%
	Geometric Return Estimate	6.85%
Black Rock (Geometric Average, Jan 2025)		7.00%
Kroll, Inc. (April 2025)		10.41%
Forecasted 10 to 15 year annual returns; J.P. Morgan Asset Management 2025 Edition,		
Forecasted 20-year annual geometric returns on U.S. common stocks; January 2025  Kroll, Inc. 5.50% Equity Risk Premium + 4.91% Riskfree Rate Risk free is based on current 20 year T-Bond yield in April 2025		

6  
 7 The 12.05% return forecasted by Ms. Bulkley is purely her own work, produced for her  
 8 analysis in this docket. On the other hand, institutional money managers employ  
 9 professional forecasters to estimate future market returns. These forecasts are essential to  
 10 institutional money managers' performance and ability to meet clients' needs. Combined,  
 11 BlackRock and J.P. Morgan Asset Management (JPMAM) have more than \$11 trillion of  
 12 assets under management with individual and institutional clients worldwide. Other asset  
 13 managers, like Vanguard Group, which has over \$8 trillion in assets under management,  
 14 forecast lower long-term returns than BlackRock and JPMAM.

1 It is also important to note that Ms. Bulkley's expected 12.05% forecasted return for the  
2 market is the product of her relying on a very select group from the SP500. She offers no  
3 details regarding the companies excluded from her study. Based on her work papers for  
4 Exhibit AEB-6, she applied the same criteria as those in the 23-775 Docket, excluding  
5 companies that do not pay dividends, those with negative earnings growth, and those with  
6 earnings growth greater than 20%. Her screening process results in a modified index that  
7 does not look like the SP500 or the equity markets. For instance, her modified index does  
8 not include companies Berkshire Hathaway, ExxonMobil, Amazon, and NVIDIA.<sup>35</sup> Each  
9 is a significant participant in their respective industries, but also these are some of the  
10 largest publicly traded companies globally, and the long-run return expected for these  
11 companies affects investors' expected returns. These four are just some of the *134*  
12 *companies* Ms. Bulkley removed from the SP500 when she calculated her expected return  
13 for the "market."

14 **Q. Does Ms. Bulkley attempt to legitimize her estimate of a 12.05% return for the**  
15 **market?**

16 A. Yes, Ms. Bulkley rationalizes the reasonableness of a 12.05% return by comparing it to the  
17 annual returns of the years 1926-2023, stating that her expected annual return of 12.05%  
18 is within the return investors experienced in the past. That is correct and consistent with  
19 Staff's CAPM, which is based on historic market returns. As mentioned above in the  
20 discussion of Staff's CAPM analyses, those historic returns of the past 97 years are the  
21 result of the economic growth rates of that era, which were greater than those expected

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<sup>35</sup> Direct Testimony of Ann E. Bulkley; Exhibit AEB-6, pages 1-6; Docket 25-EKCE-294-RTS.

from 2025 going forward. For that historic 97-year period, U.S. nominal GDP experienced an annual growth rate of 6.11%.<sup>36</sup> Going forward, long-run nominal GDP growth expectations examined by Staff average 4.08%.<sup>37</sup>

As I discuss later in my testimony the growth rates used in Staff's DCF analysis, there is a close relationship between economic growth and expected returns on common stocks. The difference in economic growth between the past and the future is substantial. The widely accepted prospective economic growth rate does not support a 12.05% return in the market.

There is also the fact that if corporate profits, which are a part of the national income accounts, were to have grown at a rate of 10.51% as Ms. Bulkley expects, that is so much greater than that of the aggregate economy we would have observed corporate profits becoming an ever larger portion of GDP, a phenomenon that has not happened and cannot occur indefinitely. Ms. Bulkley does not present evidence to support that such a seismic change in GDP will occur. Ms. Bulkley's ROE recommendation depends directly on her theory that earnings grow, in perpetuity, at 6.56% for her electric utility proxy group and

**Historical Nominal GDP (Billion \$'s)  
Compound Annual Growth Rate**

1929	\$	104.60	
2024	\$	29,183.80	<b>6.11%</b>

Source: Bureau of Economic Analysis

Table 1.15 Gross Domestic Product

[www.bea.gov](http://www.bea.gov)

36

**Nominal GDP Estimates**

Energy Information Agency (EIA) 2023 - 2050	4.29%
Congressional Budget Office Long-term Outlook 2024 - 2054	3.89%
Soc Sec Admin (SSA) OASDI Trustees Report 2024 - 2100	4.07%
Average of Forecasts	4.08%
Historical Compound Growth Rate 1929-2024	6.11%

Sources:

EIA Annual Energy Outlook 2023

An Update to the Economic Outlook: 2024-2054; CBO, July 2024

OASDI Trustees Report Office of the Chief Actuary, Table V.B1-V.B2 (2024)

BEA; Table 1.15 Gross Domestic Product

37

10.51% for the broad equity market; both forecasts are well above the growth rate expected for the economy going forward. Her assumptions for earnings growth cause an upward bias in her recommended return for EKC.

**Q. Have you quantified the effect of this error?**

A. As I established above, Ms. Bulkley's market return estimate in her CAPM and eCAPM is 300 basis points above institutional investors' forecasts. Coupled with the proxy group average beta of 0.90, her CAPM overstates the ROE by about 220 basis points, from 10.72% to 8.53%.

**Risk Premium Analysis Rebuttal**

**Q. Please describe Ms. Bulkley's Utility Risk Premium study.**

A. Ms. Bulkley constructs a Utility Risk Premium equation from quarterly data of allowed returns granted to electric utilities by regulatory commissions from 1980 through 2024 and the 30-Year U.S. Treasury Bonds yield. She obtains the quarterly data on allowed returns from S&P Market Intelligence, commonly referred to by its historic name, Regulatory Research Associates or RRA. She uses this data to derive a "risk premium" that regulators have granted to electric utilities over the prevailing U.S. Treasury Bond Yields at the time of the rate case decision.

**Q. Should the Commission put any weight on Ms. Bulkley's "risk premium" study?**

A. No. I disagree with using her analysis because it has weaknesses that cast doubt on the applicability of the results to any specific utility, such as EKC. Although the data provides

1 an interesting retrospective of regulatory and U.S. Treasury yield history, the Commission  
2 should disregard it in setting the allowed return for four reasons.

3 *First*, the primary data is not derived in the competitive capital markets by decision makers  
4 who put their capital at risk. Competitive financial markets are universally considered  
5 highly efficient in that the reported prices reflect the actions of a willing buyer and a willing  
6 seller of a security acting on the available information. The allowed ROEs granted by  
7 utility commissions do not embody the decisions of countless market participants. Those  
8 allowed ROEs are of the utility commissioners who are not taking an economic position in  
9 the securities but instead making public policy rulings. Those commissioners are not  
10 taking a financial risk by purchasing or selling stock when they set a return.

11 Second, there is no control for risks and policy decisions specific to each rate case decision  
12 relative to the issues presented in this Docket and EKC's risk profile. The data in the study  
13 is the allowed return adopted by public utility commissions in rate cases from 1980 through  
14 2024. This data is the result of commissions' decisions weighing the cost of equity  
15 analyses filed in the dockets as well as all of the other elements and nuances of the rate  
16 case that is before them; elements that may or may not exist in this docket, for example the  
17 presence or absence of regulatory mechanisms in place for EKC. Ms. Bulkley gathers the  
18 allowed returns on equity data on dockets involving vertically integrated electric utilities  
19 without screening for the risk of the underlying utilities. There is no way to know how the  
20 utilities' risk in those cases compares to EKC's and Evergy's bond ratings or any other risk  
21 measures. The Commission needs to be cautious in using a risk premium study like Ms.  
22 Bulkley has proposed because it does not comport with the framework set out in the *Hope*

1 and *Bluefield* decisions, as there is no comparison of the risk of the utilities in that historic  
2 data to the risk of EKC today.

3 Third, the risk premium study is not a comprehensive measure of ROEs used to set revenue  
4 requirements because rate case outcomes do not report the allowed ROE. Not all allowed  
5 returns on equity used to establish a revenue requirement are reported at RRA; at times,  
6 there are agreements that remain silent on that issue, even though a new revenue  
7 requirement is established. It is impossible to know if those missing data points change  
8 the results. The amount of missing data points is noteworthy. From 1980 through 2024,  
9 Ms. Bulkley relied on 1,904 rate case decisions of vertically integrated electric utilities that  
10 contained a specific ROE granted to the utility. In that same period, for vertically  
11 integrated utilities, 332 or 17% were settled with *no* ROE stated in the order.

12 Fourth, the regression equation attempts to forecast a rate case outcome based on a single  
13 input of interest rates. To my knowledge, the Commission has never relied on this  
14 approach to set an allowed return. As an experienced rate of return analyst, I believe it  
15 grossly oversimplifies the issue. Merely using an interest rate relationship to allowed  
16 returns does not account for the risk of EKC compared to those historic decisions across  
17 the 44 years.

18 **Regulatory & Business Risks**

19 **Q. Do you agree with Ms. Bulkley's analysis of the regulatory and business risks EKC**  
20 **faces?**

21 **A. EKC faces regulatory and business risks, as do all of the 17 electric utilities in the proxy**

1 group, and all other regulated utilities. Ms. Bulkley conveys a picture that EKC faces  
2 greater risks. The overall business risk data does not support her conclusion. Significantly,  
3 Ms. Bulkley's Exhibit AEB-10 reports that S&P views Kansas' regulatory construct as  
4 "Highly Credit Supportive." Both rating organizations state that regulatory and legislative  
5 risks are important in their ratings of regulated public utilities. Moody's states that  
6 regulatory risk comprises 25% of the ratings scorecard, while the utility's ability to charge  
7 rates that recover its costs and earn its allowed return comprises an additional 25% of the  
8 rating score.<sup>38</sup> Ms. Bulkley and I relied on credit ratings as a screen when selecting our  
9 proxy groups, and we selected electric utilities with credit ratings similar to EKC, EKS and  
10 Evergy. Ms. Bulkley's attempt to refine these risks only considers certain elements. It  
11 makes it difficult to determine whether she is double-counting risks while ignoring  
12 mitigating elements that the rating agencies considered in their risk assessment.

### 13 **Nuclear Generation as a Risk Factor**

14 **Q. Mr. Ley and Ms. Bulkley cite to EKC's ownership of nuclear generation as a risk that**  
15 **the Commission must consider when setting an allowed ROE. Does Staff agree?**

16 A. Each form of generation represents a risk profile. The question is whether EKC's  
17 generation profile brings a level of risk that is so different from that of the proxy group that  
18 the Commission must make a specific adjustment to account for that risk.

19 **Q. Please describe EKC's ownership of nuclear generation assets.**

20 A. EKS, a subsidiary of EKC, formerly known as Kansas Gas & Electric owns 47% of Wolf  
21 Creek Nuclear Operating Corporation (Wolf Creek); Evergy Metro, formerly known as  
22 Kansas City Power & Light, also an Evergy subsidiary owns 47% while Kansas Electric

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<sup>38</sup> Moody's Investor Service Credit Opinion (CURB 13, confidential), Evergy Kansas Central, Inc. January 17, 2025; p.7.

1 Power Cooperative, Inc. owns the remaining 6% of Wolf Creek. Wolf Creek represents  
2 1,106 MW of Evergy's 12,036 MW of owned generation and its 3,754 MW purchased  
3 power portfolio.<sup>39</sup> Wolf Creek began operations in 1985 and has been granted a 20-year  
4 life extension to end operations in 2045.

5 **Q. Does the proxy group selected by Ms. Bulkley included electric utilities that own**  
6 **nuclear generation assets?**

7 A. Yes. Ms. Bulkley reports in her testimony that 9 of the 17 proxy companies own nuclear  
8 generation assets.<sup>40</sup> Accordingly, the risks associated with nuclear generation are well  
9 represented within the proxy group. The following table appears in Ms. Bulkley's direct  
10 testimony at p.48.

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<sup>39</sup> Evergy, Inc.; SEC Form 10-K for 2024; pp.32-33.

<sup>40</sup> Bulkley Direct; 25-EKCE-294-RTS; p. 48.



TABLE 1: OWNED NUCLEAR GENERATION – EKC GROUP

Company	Own Nuclear Generation
Alliant Energy Corporation	No
Ameren Corporation	Yes
American Electric Power Company, Inc.	Yes
Avista Corporation	No
CMS Energy Corporation	No
DTE Energy	Yes
Duke Energy Corporation	Yes
Entergy Corporation	Yes
IDACORP, Inc.	No
NextEra Energy, Inc.	Yes
NorthWestern Corporation	No
OGE Energy Corporation	No
Pinnacle West Capital Corporation	Yes
Portland General Electric Company	No
PPL Corporation	No
Southern Company	Yes
Xcel Energy Inc.	Yes
<b>Own Nuclear Generation</b>	<b>9</b>
<b>Total</b>	<b>17</b>
<b>% Owned Nuclear Generation</b>	<b>53%</b>

1

2 **Q. Are there other EKC witnesses addressing nuclear generation risk?**

3 A. Mr. Ley addresses it on page 14 of his direct testimony, stating that electric utilities with  
 4 nuclear generation facilities have been granted an average of 37-basis point premium over  
 5 the average allowed ROE granted to electric utilities without nuclear generation. His  
 6 question and response are below.

. **Are there any company-specific risks that should be accounted for in this proceeding?**

. Ms. Bulkley identifies nuclear power operations as a relevant company-specific risk.<sup>13</sup>

Utilities with nuclear operations across the industry have more risk and have historically been allowed higher ROEs. As shown in *Figure 1* and *Figure 2* below, the average authorized ROE across all states is approximately 9.67%, while the subset of states with nuclear operations in investor owned, vertically integrated utilities report an average authorized ROE of 10.04%. That represents a 0.37% premium in the average authorized ROE for states that have utilities with nuclear operations relative to the nationwide average. Such a differential is not surprising in light of the unique risks that credit rating agencies and investors recognize when it comes to utilities' ownership of nuclear generating assets.

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I disagree with Mr. Ley's extrapolation from the national data. The data does not demonstrate investors' views regarding the risk of nuclear power assets. The underlying data is the allowed returns granted to electric utilities. Mr. Ley independently and without evidence concludes that the 37 basis points are tied to only *one* issue, ownership of nuclear generation, when in reality, there are many policy issues underlying each commission's decision. To that point, Mr. Ley did not compare electric utilities of comparable risk to EKC. He simply looked at broad national averages of commission decisions on allowed ROEs and drew his own conclusion.

10 **Q. Does Ms. Bulkley's analysis support Mr. Ley's conclusion?**

11 A. No. Ms. Bulkley's analysis using data on the Proxy Group from the current capital markets  
12 contradicts Mr. Ley's conclusion. Ms. Bulkley's 17-member proxy group contains 9 that  
13 own nuclear generation. Based on her study that directly measures investor behavior (not  
14 behavior of commissions as Mr. Ley has done), those 9 on average have lower beta

coefficients and lower DCF results than the 17-member group; these two measures of investors' view of risk contradict Mr. Ley's assertion.

**Q. Do you disagree that ownership of nuclear generation facilities brings with it, unique risks?**

A. There is no doubt that there are unique risks associated with nuclear generation. Every credit rating report supplied by EKC in response to data request CURB-13 contains a discussion of that issue; it is clearly a factor in the EKC and Evergy credit ratings, and that of the proxy companies. The question is whether the Commission must make an explicit allowance for this risk because it is not captured in the proxy group. I contend that an explicit upward adjustment is not warranted to meet the Hope and Bluefield standards because that risk is captured in the proxy group.

#### **Wildfire Risks**

**Q. Ms. Bulkley specifically cites wildfires in her discussion of EKC's regulatory and business risks, is this a risk that should affect EKC's allowed ROE?**

A. I agree that it is a risk for EKC, as it is for virtually all electric utilities including those of the Proxy Group. It is a risk that investors are aware of and able to price that risk into their financial analysis of each member of the Proxy Group, thus that risk is captured in the DCF and CAPM analyses. There is no evidence that EKC faces greater wildfire risks than those faced by the Proxy Group members. Furthermore, legislation in Kansas through H.B. 2107 defines and reduces the liability of Kansas electric utilities for fire events.

#### **Capital Expenditures**

**Q. Does Staff agree that EKC will have higher capital expenditures during the next five years it has had in the recent decade?**

A. Yes, the electric utility industry and EKC are forecast to have higher levels of capital

1 expenditures on plant and equipment than experienced in the recent past. Mr. Ley  
2 discusses projected capital expenditures for the industry and EKC beginning on page 10 of  
3 his direct testimony. Ms. Bulkley discusses the issue beginning at page 37 of her direct  
4 testimony. The need for additional capital investment in plant and equipment to meet  
5 projected load growth is an issue throughout the electric utility industry and noted by  
6 quotes from all three credit rating firms on pages 56-57 of Ms. Bulkley's testimony. With  
7 at least one ratings firm recognizing that revenue requirement recovery of and return on  
8 those capital expenditures will press against bill affordability issues.<sup>41</sup>

9 Specific to EKC, there is evidence that it will incur a significant level of capital expenditure  
10 and a level greater than the average of the Proxy Group, although not outside the range of  
11 observations. The following table compares projected capital expenditures against existing  
12 net plant, property, and equipment balances. I excluded transmission from the projected  
13 capital expenditures because those are largely FERC-regulated, subject to an annual  
14 formula rate mechanism.

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<sup>41</sup> Bulkley Direct 25-EKCE-294-RTS; p. 57.

<b>Comparison of Projected Capital Expenditures (without Transmission)  Against 2024 Net Property Plant &amp; Equipment Balances  Proxy Group, Evergy, Inc. and Evergy Kansas Central, Inc.  25-EKCE-294-RTS</b>						
1		2	3	4	5	6
		Net PP&E (\$s in Mil)	CapEx '25-'27	CapEx/ Net PP&E	CapEx Annualized	
Alliant Energy Corporation	LNT	\$ 18,701	\$ 7,316	39%	\$ 2,439	13%
Ameren Corporation	AEE	\$ 36,376	\$ 14,498	40%	\$ 4,833	13%
American Electric Power Company, Inc.	AEP	\$ 82,996	\$ 11,980	14%	\$ 3,993	5%
Avista Corporation	AVA	\$ 6,119	\$ 2,325	38%	\$ 775	13%
CMS Energy Corporation	CMS	\$ 27,485	\$ 12,000	44%	\$ 4,000	15%
DTE Energy Company	DTE	\$ 31,081	\$ 17,808	57%	\$ 5,936	19%
Duke Energy Corporation	DUK	\$ 122,757	\$ 33,475	27%	\$ 11,158	9%
Entergy Corporation	ETR	\$ 47,847	\$ 18,845	39%	\$ 6,282	13%
IDACORP, Inc.	IDA	\$ 6,517	\$ 1,647	25%	\$ 549	8%
NextEra Energy, Inc.	NEE	\$ 140,050	\$ 74,224	53%	\$ 24,741	18%
NorthWestern Corporation	NWE	\$ 6,398	\$ 1,637	26%	\$ 546	9%
OGE Energy Corporation	OGE	\$ 11,538	\$ 2,590	22%	\$ 863	7%
Pinnacle West Capital Corporation	PNW	\$ 20,114	\$ 5,725	28%	\$ 1,908	9%
Portland General Electric Company	POR	\$ 10,296	\$ 1,880	18%	\$ 627	6%
PPL Corporation	PPL	\$ 33,149	\$ 9,025	27%	\$ 3,008	9%
Southern Company	SO	\$ 105,870	\$ 21,900	21%	\$ 7,300	7%
Xcel Energy Inc.	XEL	\$ 57,861	\$ 17,030	29%	\$ 5,677	10%
			Mean	32%		11%
			Median	28%		9%
Evergy, Inc.	EVRG	\$ 24,787	\$ 6,025	24%	\$ 2,008	8%
Evergy Kansas Central*	EKC	\$ 12,880	\$ 5,249	41%	\$ 1,750	14%
*Geoffrey T. Ley Direct, p. 11; \$7.4 billion ('25 thru '29) of EKC cap ex from EVRG earnings call November 7, 2024; Slides 25 & 26						
1) Proxy Group 2) Net property, plant, and equipment at December 31, 2024, reported by S&P Capital IQ Pro, 3) Utility capital expenditures update, H1 2025: 2014–29f, as of March 24, 2025. Reported by S&P Global Market Intelligence and Regulatory Research Associates (as noted, EKC is a five year forecast period provided November 7, 2024) without transmission related cap ex 4) Three year forecasted Cap Ex / Net Property Plant & Equipment 5) Annualized cap ex values, three years for proxy group and five years for EKC) 6) Annualized forecasted Cap Ex / Net Property Plant & Equipment						

**Q. Do the projected capital expenditures distinguish EKC from the proxy group?**

A. Yes, although the level of projected capital expenditures is not unique to EKC; it is industry-wide, including the proxy companies, and is well known to equity and fixed income investors. On a total and an annualized basis, EKC's projected level of capital expenditures is at the upper end of the observed range found in the proxy group. Evergy's management team educates investment analysts about their abilities and tools to manage EKC's projected capital expenditure. Those tools include plant in service accounting

(PISA) and a rider to recover construction work in progress associated with natural gas generation projects, provided through the passage of House Bill 2527. Regular rate cases are also one of those tools discussed with analysts. The following is a discussion between an analyst and Evergy senior management on their tools to manage regulatory lag.<sup>42</sup>

Next question comes from the line of Durgesh Chopra with Evercore.

**Durgesh Chopra**

*Evercore ISI Institutional Equities, Research Division*

Bryan, my congratulations to you as well. So just, guys, can you talk about the cadence of the long-term growth rate here, upper half of 4% to 6%. Is that a range that you will hit each year? Or is that more sort of a CAGR approach tied to rate case timings, et cetera, et cetera?

**David A. Campbell**

*CEO, President & Chairman of the Board*

Yes, Durgesh, a good question. And just to reiterate, we've established our 2025 guidance range in part to be -- give a baseline for that 4% to 6% following 2025 and a top half -- expected in the top half of that range. In general, we're going to have consistent execution in the top half. There are year-over-year, there can be some dynamics relating to timing. So we haven't given year-over-year guidance, but our overall goal is for consistency, but there can be some dynamics year-over-year.

In particular, our jurisdictions and the relative size can drive some variation, but we don't expect to be all that significant. And certainly, our goal is to be consistent. We know that that's what investors like to see, and that's what we'll strive for. A more regular cadence of rate cases can help with that, and it can also help from the customer perspective, we always balance that, of course, when we think about timing because then there's a more predictable and sort of ratable impact on customers as well.

**Durgesh Chopra**

*Evercore ISI Institutional Equities, Research Division*

Got it. So more close to just linear and consistent growth year on, year out. That's great. And then just as you think about regulatory lag, and you've got all this constructive legislation in the states, you're going to be in a more active rate filing cycle. How should we think about regulatory lags throughout your 5-year plan?

**W. Bryan Buckler**

*Executive VP & Chief Financial Officer*

Yes. Durgesh, I'll take that. And I'll just add on to what David said before. I really think it's -- 2026 is right around the corner, and we have a lot of momentum and tailwinds for the plan that are going to kick in beginning in '25, but certainly in 2026 and beyond.

And as you think about our 5-year plan and your question around regulatory lag and rate case cadence, we certainly are pleased to have PISA both in Kansas and Missouri. As you know, we have CWIP and rates for new gas generation. That's really important to help our credit metrics as we make these large investments for our customers.

So regulatory lag is certainly better managed under the provisions of PISA going forward, not that there's not any, there's still going to be some regulatory lag. And with this large of an investment profile over the next 5 years, it's going to be important that we stay current on our recoveries and investments. So that's why you'll see, as David described, us being a bit more regular in our cadence. Think about it as roughly every 18 months for most jurisdictions, but not all.

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<sup>42</sup> Transcript of 3<sup>rd</sup> Quarter 2024 Earnings Call, November 7, 2024; <https://www.capitaliq.spglobal.com/apiv3/spg-webplatform-core/docviewer?mid=232477492&KeyProductLinkType=2>



**David A. Campbell**  
*CEO, President & Chairman of the Board*

And Durgesh all I'd add is the, I think we've seen in Missouri, and we've got some peer utilities in the Missouri jurisdiction. PISA creates a framework where you can manage a regulatory lag, a pretty regular cadence for the other utilities in Missouri as well, reflecting that PSA doesn't lead to the earnings contribution. It just helps to mitigate lag. So there's still -- you want to have a regular cadence. So we're really pleased to have PISA enacted in Kansas, not only for the provisions and the regulatory lag mitigation, but because it reflects the consistent and widespread support for investment to support economic development in Kansas state.

So we've got mechanisms in Kansas now they're actually slightly ahead of Missouri because there is 90% deferral rather than 85% in the Seaway provision on the Kansas side, not yet on the Missouri side. So we think there are tools to manage that regulatory lag, but a regular cadence of rate cases will be important. And again, from my perspective, also beneficial for customers because a little more predictable and more regular as opposed to having longer delays and then step function increases.

**Durgesh Chopra**  
*Evercore ISI Institutional Equities, Research Division*

I appreciate that discussion, very helpful. But just kind of putting a finer point on it, Dave, are you modeling substantial improvement in regulatory lag as you roll out this 5-year capital plan? Or how should we think about that? Maybe just directionally if you don't want to quantify it?

**W. Bryan Buckler**  
*Executive VP & Chief Financial Officer*

Yes. I mean, directionally, there's no doubt. As we -- I'll give it to you this way, Durgesh. When we went through the modeling, I was able, as David mentioned, to come in with some fresh lenses, but I'm quite fortunate to come into the company after -- that there was some -- the company had notched some significant achievements in 2024.

We've talked about the supportive legislation in Kansas, constructive rate case settlement in Missouri and then the Google announcement in the second quarter. So certainly, the team has been through very much the detailed planning. We've looked at earnings growth that is, as I mentioned, very strong beginning 2026, which is right around that corner.

We've embedded the load growth we expect, but with more tailwinds to come. We now have rate base growth that's 8% versus the past, it was 6%. So all those things give us tremendous confidence in being in the top half of that 4% to 6% growth through 2029.

I do think we're being conservative in our messaging, as David mentioned, because we want to execute across our work streams, and firmly land at a higher growth rate, hopefully, in the future. But directionally speaking, for sure, regulatory lag is less burdensome than it was in previous plans given the provisions of the law we have

1  
2 Management states that it has tools to manage regulatory lag and that the capital investment  
3 and the load growth that those assets will serve will increase Evergy's earnings growth rate.  
4 Regulatory risk cannot be eliminated; it comes with being a regulated utility granted an exclusive  
5 franchise. Like all the electric utilities in the proxy group, EKC faces regulatory risks because  
6 economic regulation of monopolies has been found to be in the public interest. The level of  
7 regulatory risk from EKC's capital investments is not outside of what is observed in the proxy  
8 group.

### Standards for a Just & Reasonable Rate of Return

9 Q. What is the role of rate of return in setting a revenue requirement for public utilities?

1 A The ROR earned on the utility's net plant is part of the revenue requirement equation. The  
2 ROR is a cost of providing the utility service, and all reasonable costs associated with the  
3 ROR need to be included in the revenue requirement.

4  
5 
$$\text{Revenue Requirement} = \text{ROR (gross plant - accum. depr.)} + \text{Operating Exp.} + \text{Income Taxes}$$

6 As you can see in the revenue requirement formula, the ROR expressed in this equation  
7 recovers the utility's return on its net plant investment.

8 **Q How is the utility's ROR calculated?**

9 A utility's ROR is its weighted average cost of capital (COC). COC is the cost of each of  
10 the various forms of capital supplied by investors, which includes debt, preferred equity,  
11 common equity, and any hybrid securities, multiplied by their respective weights in the  
12 utility's capital structure. The cost or return associated with each of these forms of capital  
13 is unique and a function of the risks associated with that form of capital.

14 **Q What are we talking about when we discuss a utility's rate of return or allowed**  
15 **return?**

16 A In the broadest terms, a just and reasonable rate of return enables the utility to pay interest  
17 on its debt and earn a net income that is sufficient to compensate equity investors.

18 **Q. What standards should commissions consider when authorizing a rate of return?**

19 A. The standards for setting a just and reasonable rate of return require that, to be reasonable,  
20 the allowed return must reflect the risks associated with an equity investment in the utility.  
21 For the allowed return to be in that reasonable range, it must compensate for those added



1 risks while capturing a fair proportion of benefits for consumers. The allowed ROE is best  
2 described as the forward-looking discount rate necessary to induce equity investors to  
3 commit their capital to the enterprise. Standards used to gauge the fairness and  
4 reasonableness of an allowed ROE have been stated by courts, as a result of appeals of  
5 decisions issued by regulatory agencies. Financial analysts and policy-makers rely on the  
6 courts' decisions to estimate the appropriate allowed return. The opinions do not provide  
7 a detailed discussion on precisely how to estimate or model a reasonable allowed return.  
8 Instead, the decisions provide critical questions for policymakers and analysts to consider  
9 in determining a reasonable return for a regulated utility.

10 In general, United States Supreme Court decisions state that returns granted to regulated  
11 public utilities should: (1) be commensurate with returns on investments of similar risk;  
12 (2) be sufficient to assure the financial integrity of the utility under efficient economic  
13 management; and (3) change over time with changes in the money market and business  
14 conditions.<sup>43</sup> An important take-away from these decisions is that the Supreme Court of  
15 the United States has afforded regulatory agencies a significant amount of latitude in  
16 establishing an appropriate ROR and ROE for a utility. The Kansas Supreme Court  
17 recognizes and follows this body of law.<sup>44</sup> This Commission has noted this fact in Orders  
18 issued in previous dockets.<sup>45</sup>

19 **Q. Will you please discuss how financial analysts apply the standards established by the**

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<sup>43</sup> *Smyth v. Ames*, 169 U.S. 466 (1898); *Wilcox v. Consolidated Gas Co.*, 212 U.S. 19, 48-49 (1909); *Bluefield Water Works & Improvement Company v. Public Service Commission of West Virginia*, 262 U.S. 679, 692-3 (1923); *Federal Power Commission v. Hope Natural Gas Company*, 320 U.S. 591, 603 (1944).

<sup>44</sup> *Kansas Gas & Elec. Co. v. State Corp. Comm'n*, 239 Kan. 483, 491, 720 P. 2d 1063, 1072 (1986).

<sup>45</sup> Order: 1) Addressing Prudence; 2) Approving Application, in Part; & 3) Ruling on Pending Requests, Docket No. 10-KCPE-415-RTS, November 22, 2010, 37-38.

1           **Courts?**

2       A.     For an allowed ROE to meet the legal standards, the return should be as specific as possible  
3           to the utility in question. Financial analysts achieve this goal by analyzing not only the  
4           utility in question, when it is possible to do so, but also a proxy group of similarly situated  
5           utilities using established and accepted financial models, just as investors do.

6           There are several court cases that, as a group, are viewed as the keystone to measuring the  
7           adequacy of a utility's allowed return. The earliest of these decisions go back to an era  
8           when it was not only the "rate of return" at issue, but also the fundamental measurement  
9           of the investment in the utility enterprise, commonly referred to as rate base. This is less  
10          of an issue today as regulators, utility management, and investors readily accept actual  
11          historic-depreciated value as the measure of investment to estimate the value of a utility's  
12          rate base (as opposed to reproduction cost or market value). The Court's decision in  
13          *Bluefield* addressed both rate base and ROR.<sup>46</sup> Treatises on rate of return for public  
14          utilities, such as The Cost of Capital – A Practitioner's Guide, agree that *Bluefield* lays out  
15          the four standards for a fair return:

- 16           1) *Comparable Earnings* – a utility is entitled to a return similar to that  
17           being earned by other enterprises with similar risks, but not as high  
18           as those earned by highly profitable or speculative ventures;  
19           2) *Financial Integrity* – a utility is entitled to a return level reasonably  
20           sufficient to assure financial soundness;  
21           3) *Capital Attraction* – a utility is entitled to a return sufficient to  
22           support its credit and raise capital; and  
23           4) *Changing Level of Returns* – a fair return can change along with

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<sup>46</sup> *Bluefield Water Works & Improvement Co. v. Pub. Svc. Comm'n of West Virginia*, 262 U.S. 679, 692-3 (1923).

1 economic conditions and capital markets.<sup>47</sup>

2 As a financial analyst formulating rate of return analyses for our state Commission, it is  
3 my understanding from *Bluefield* a rate Order should allow a utility an opportunity to earn  
4 a return consistent with the utility's risk profile and consistent with observations in the  
5 capital markets. The Court's decision in *Hope*,<sup>48</sup> like that in *Bluefield*, dealt with both  
6 valuation of rate base, as well as rate of return on that rate base. With respect to the rate of  
7 return, the Court in *Hope* affirmed the four standards set out in *Bluefield*.

8 **Q. How do the Court's decisions offer guidance to analysts and Commissioners in setting**  
9 **a reasonable return on equity?**

10 A. The Court's decisions provide a framework to help decision-makers understand the critical  
11 elements of a fair return, but the Court's decisions do not endorse or reject any specific  
12 financial model. There are numerous financial models available for analysts to estimate a  
13 utility's cost of equity capital. Regardless of which model is used, the analyst's  
14 recommendation must meet the principles set out in the Court's decisions.

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<sup>47</sup> The Cost of Capital – A Practitioner's Guide by David C. Parcell, Prepared for the Society of Utility and Regulatory Financial Analysts, 1997, pp. 3-13 to 3-14.

<sup>48</sup> *Federal Power Comm'n. v. Hope Natural Gas Co.*, 320 U.S. 591, 603 (1944). "The rate-making process under the Act, i.e., the fixing of 'just and reasonable' rates, involves a balancing of the investor and the consumer interests. Thus, we stated in the *Natural Gas Pipeline Co.* case that 'regulation does not insure that the business shall produce net revenues.' But such considerations aside, the investor interest has a legitimate concern with the financial integrity of the company whose rates are being regulated. From the investor or company point of view, it is important that there be enough revenue not only for operating expenses but also for the capital costs of the business. These include service on the debt and dividends on the stock. By that standard, the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks. That return, moreover, should be sufficient to assure confidence in the financial integrity of the enterprise, so as to maintain its credit and to attract capital. The conditions under which more or less might be allowed are not important here. Nor is it important to this case to determine the various permissible ways in which any rate base on which the return is computed might be arrived at. For we are of the view that the end result in this case cannot be condemned under the Act as unjust and unreasonable from the investor or company viewpoint."

1     **Q.     How can commissions meet those four standards?**

2     A.     Selecting a proxy group of comparable risk to the utility in question is a significant piece  
3           of meeting the standards set out by the Court. I agree with Ms. Bulkley and Mr. Ley that  
4           capital markets are highly competitive, and investments of similar risk demand an  
5           opportunity to earn a similar return for investors to commit their capital. The proxy group  
6           is of the same industry, and even further similar level of risks as assessed by credit rating  
7           specialists. Commissions can meet the financial integrity and creditworthiness standards  
8           by providing the utility a reasonable opportunity to earn the rate of return and the revenue  
9           requirement that it is granted. The ability to attract capital again goes back to relying on a  
10          suitable proxy group to determine an allowed return, and that the allowed ROE offers a  
11          sufficient premium above investments lower in risk. Cost of capital witnesses recite these  
12          standards in every rate case, the standards apply directly to cost of capital analyses.

13    **Q.     Precisely, what are the financial models attempting to measure?**

14    A.     Regulators use the financial models to estimate the investors' required rate of return for  
15          owning the stock. The required rate of return is also referred to as an opportunity cost.  
16          Investors will only commit their capital to investments that meet their required return.  
17          Investors' required rate of return is their opportunity cost for investing in the utility, as  
18          opposed to using the funds for an alternative investment of comparable risk. Of course,  
19          risk is a vital consideration; the only relevant alternative investments are those that possess  
20          a comparable risk profile to that of the utility in question.

1   **Q.     Is the return on equity supposed to compensate investors for all risks associated with**  
2       **the investment in a utility's common stock?**

3   A.    No, it is not. Regulators need to be cognizant of financial theory and the Court's decisions  
4        when establishing the utility's allowed return on equity. Regulators must not attempt to  
5        compensate equity investors for every risk faced by a utility. To do so would overstate  
6        investors' required return because investors can, and therefore will, reduce risk by holding  
7        a broad and diverse group of investments with complementary risk profiles. Prudent  
8        investors own a diversified portfolio of investments to reduce their exposure to risk.  
9        Diversification enables prudent investors to reduce risk without reducing returns.  
10       Diversification is implicit in cost of capital analyses because rational investors desire  
11       diversification to achieve the greatest available return for the amount of risk they can  
12       tolerate. This is well documented in financial literature and is prudent, profit-maximizing  
13       behavior by the investors.<sup>49</sup>

14   **Q.     Does Staff's proposal meet these standards?**

15   A.    Yes, in addition to being consistent with the Commission's policy on RORs and the fact  
16        that it is corroborated by the other data I discuss above (e.g., comparisons to ROEs set in  
17        previous cases, comparisons to ROEs in other jurisdictions, etc.), my conclusion is that  
18        Staff's ROE proposal satisfies the *Hope* and *Bluefield* standards as experts and the courts  
19        have explained them.

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<sup>49</sup> Steven G. Kihm, How Improper Risk Assessment Leads to Overstated Required Returns for Utility Stocks (2003).

**Proxy Group of Electric Utility Companies**

1   **Q.     How did you select a proxy group for your cost of equity analysis?**

2   A.     I reviewed the proxy group Ms. Bulkley selected for her analysis; I found that it is  
3           reasonable to use that group of 17 electric utilities as a proxy group (Proxy Group) to  
4           estimate an ROE for EKC.

5   **Q.     Why is it reasonable to use the proxy group selected by Ms. Bulkley?**

6   A.     First, and foremost, each of the Proxy Group members are comparable to EKC as measured  
7           by a handful of fundamental business and financial measures. As we know that securities  
8           markets are efficient, we can be assured that the financial markets will value the cash flows  
9           from the Proxy Group similarly to the value of the cash flows from EKC were it publicly  
10          traded. Evergy owns all the outstanding shares of EKC, thus it is not publicly traded and  
11          not directly valued by investors. The criteria that Ms. Bulkley used to screen the 36 electric  
12          utilities followed by Value-Line Investment Survey are specific fundamental business and  
13          financial measures similar to measures I have used in past electric utility rate cases. Ms.  
14          Bulkley stated that she used the following criteria to select the Proxy Group.<sup>50</sup>

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<sup>50</sup> 25-EKCE-294-RTS; Bulkley Direct p.19.

- pay consistent quarterly cash dividends, since companies that do not cannot be analyzed using the constant growth DCF model;
- have investment grade long-term issuer ratings from both S&P and Moody's;
- are covered by more than one utility industry analyst;
- have positive long-term earnings growth forecasts from at least two equity analysts;
- own generation assets included in rate base;
- derive at least 40 percent of sales from company-owned generation;
- derive at least 60 percent of the Company's operating income from regulated electric operations; and
- were not party to a merger or transformative transaction during the analytical period considered.

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EKC is a vertically integrated electric utility with investment grade bond ratings, Ms. Bulkley's screens capture utilities with these qualities along with qualities to meet the requirements of the DCF model. I reviewed her discussion of the selection criteria and agree with her characterization of the process.<sup>51</sup> It has been my experience over the past 35 years that the proxy group does not account for the differences between parties in these ROE analyses if participants apply a rigorous selection process.

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<sup>51</sup> 25-EKCE-294-RTS; Bulkley Direct pp. 18-22

<b>Company</b>	<b>Ticker</b>
Alliant Energy Corporation	LNT
Ameren Corporation	AEE
American Electric Power Company, Inc.	AEP
Avista Corporation	AVA
CMS Energy Corporation	CMS
DTE Energy	DTE
Duke Energy Corporation	DUK
Entergy Corporation	ETR
IDACORP, Inc.	IDA
NextEra Energy, Inc.	NEE
NorthWestern Corporation	NWE
OGE Energy Corporation	OGE
Pinnacle West Capital Corporation	PNW
Portland General Electric Company	POR
PPL Corporation	PPL
Southern Company	SO
Xcel Energy Inc.	XEL

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2 **Q. Do you agree with Ms. Bulkley conclusion that regulatory risk for EKC is higher than**  
3 **that of the Proxy Group, thus Kansas regulation poses more risk for investors?**

4 A. No, the evidence demonstrates that regulatory risks for EKC are comparable to that of the  
5 Proxy Group. In addition to my earlier discussion on specific risk issues raised by EKC  
6 witnesses, I would add that EKC utilizes regulatory mechanisms like those of the Proxy  
7 Group. Specifically, EKC uses a fuel adjustment clause, pension and OPEB (other post-  
8 employment benefits) tracker, property tax surcharge rider, energy efficiency cost recovery  
9 rider, transmission delivery charge rider, critical infrastructure protection and cyber  
10 security tracker, and the opportunity for an abbreviated rate case (if granted by the



Commission) one year following a full rate review. In the past, EKC has made use of an environmental cost recovery rider. These regulatory mechanisms reduce regulatory lag and stabilize cash flow to EKC, thus are relevant for issues in setting an allowed ROE.

Recent legislation in Kansas<sup>52</sup> provides recovery of deferred depreciation and return on qualifying electric plant in service known as plant in service accounting or PISA. PISA enables EKC to recover through a deferral, depreciation and return that would have otherwise been unrecoverable. EKC also has a rider available to recover construction costs of gas fired generation if the Commission decides the investment is reasonable EKC can recover the return on the associated construction work in progress at its weighted average cost of capital. The Commission should consider these regulatory mechanisms when it evaluates EKC's risk to determine its allowed return because each of those mechanisms calls upon consumers to fund changes in annual cash needs of the utilities, shifting costs to consumers sooner in the assets life.

The credit rating service S&P ranks Kansas as "Highly Credit Supportive," the second highest rating on its scale of credit supportiveness with only six states ranking higher than Kansas. Exhibit AEB-10 of Ms. Bulkley's Direct provides the rankings of Kansas and state of the Proxy Group. Kansas's credit supportiveness ranking exceeds the average for the Proxy Group companies, Kansas' regulatory atmosphere possess less regulatory risk than that experienced by the Proxy Group in their respective states.

I reviewed the regulatory mechanisms of the proxy group as reported by RRA via S&P's

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<sup>52</sup> House Bill 2527.

Capital IQ<sup>53</sup> as these sources are widely used by investors and one of the few publications that publish a utility-by-utility comparison of these mechanisms. The RRA report was prepared in 2022, it does not reflect the recently enacted legislation allowing PISA and the gas plant rider available to EKC.

RRA reports utilities' use of regulatory mechanisms in broad categories. The details of specific mechanisms can vary across utilities and even within utilities that serve multiple states as each state regulatory body assesses the costs and benefits of a mechanism while balancing the utility's needs with those of consumers and other stakeholders. In a broad sense, the mechanisms fall into three broad categories: expedited cost recovery, expedited capital cost recovery, and protection of cash flows from volumetric changes.

Use of adjustment clauses, as of June 2023										
S&P Global Market Intelligence		Ultimate parent ticker	Electric fuel/gas commodity/ purch. power	Conserv. program expense	Type of adjustment clause					
					Decoupling		New capital			Transmission Costs
					Full	Partial	Traditional Generation	Renewables/Non- Traditional Generation	Delivery Infrastructure	Environmen tal compliance
State/Company										
KS	Energy Kansas Central Inc.	EVRG	✓	✓	--	✓	--	✓	--	✓
KS	Energy Kansas South Inc.	EVRG	✓	✓	--	✓	--	✓	--	✓
	Proxy		51	49	4	23	11	25	18	27
	Group		86%	83%	7%	39%	19%	42%	31%	46%
										51%

RRA reports that fuel and purchase power cost riders are nearly universal. EKC uses the most prevalent mechanisms of the proxy group. At the other end of the spectrum, few of the Proxy group have full decoupling, while more than one-third, like EKC, have mechanisms that equate to partial decoupling.

The prevalence of regulatory mechanisms for EKC is comparable to the Proxy Group. Credit rating agencies consider the availability and use of regulatory mechanisms and are

<sup>53</sup> Adjustment Clauses: A state by state overview; Regulatory Focus Topical Special Reports, July 18, 2022.

1 part of a utility's credit rating evaluation. Having selected proxy companies based on credit  
2 ratings similar to EKC, I am reluctant to make explicit adjustments based on RRA's report.  
3 The recent credit ratings include rating agencies' evaluation of the regulatory mechanisms  
4 and a full picture of each utilities' regulatory risk which offers a more complete picture of  
5 risk.

6 **Staff's Return on Equity Analysis**

7 **Q. Please summarize the results of your cost of equity analysis.**

8 A. Staff recommends the Commission authorize a 9.70% allowed ROE with a range of 9.30%  
9 to 9.95%. The table below summarizes the cost of equity estimates from my study in this  
10 Docket. I relied on a discounted cash flow (DCF) model, a multi-stage form of the DCF  
11 model known as an internal rate of return (IRR) analysis, and the capital asset pricing model  
12 (CAPM). These are the models I typically use to estimate a utility's required return on  
13 equity. The results in this table are based on capital markets data taken from the six months  
14 of November 1, 2024, through April 29, 2025.

1     **Table: Summary of Staff's Allowed ROE Estimates**

<b>Summary of Staff's Cost of Equity Estimates 25-EKCE-294-RTS</b>			
<b>Discounted Cash Flow Analyses</b>	<b>Mean</b>	<b>Low</b>	<b>High</b>
Two-Stage Growth DCF Model:			
Based on the Average of Short-Term Growth Forecasts & Long-Term nGDP Forecasts	9.02%	8.69%	9.35%
Internal Rate of Return or Multi-Stage DCF Analysis:			
Using Short-Term Growth EPS Growth & Long-Term nGDP Forecast	8.42%	7.71%	10.41%
<b>Capital Asset Pricing Models</b>			
Based on Historical Return Data, gathered from 1928 - 2022, Reported at Damodaran On-Line			
Historic Arithmetic Returns	11.01%	9.97%	12.39%
Historic Geometric Returns	9.60%	8.80%	10.68%
Based on Forecasted Return Data:			
J.P. Morgan Asset Management	6.66%	6.20%	7.27%
BlackRock	7.03%	6.50%	7.75%
Kroll Forecasted Risk Premium	9.73%	8.91%	10.83%

2

3     **Q.     What is the basis for the allowed ROE you recommend and the range?**

4     A.     Staffs allowed ROE of 9.70% reflects the changes in the capital markets observed from

5             EKC's last rate case. Notably the higher capital costs indicated by the DCF models and the

6             increase of the beta coefficients for electric utilities. The lower bounds of 9.30% is the

7             allowed return Staff recommended in the previous Evergy rate cases and equates to a risk

8             premium of 335 basis points, a risk premium comparable that observed in the 23-775

9             docket. The current capital market data supports an allowed ROE greater than EKC's was

10            appropriate in EKC's last few rate cases. The upper bounds of 9.95% reflects a risk

11            premium of 400 basis points over the observed yield on Baa corporate bonds consistent

12            with the average risk premium on Commission determined allowed ROEs.

13     **Q.     For a point of comparison, will you please summarize the return on equity decisions**

14            **made by this Commission and other Commissions across the country?**

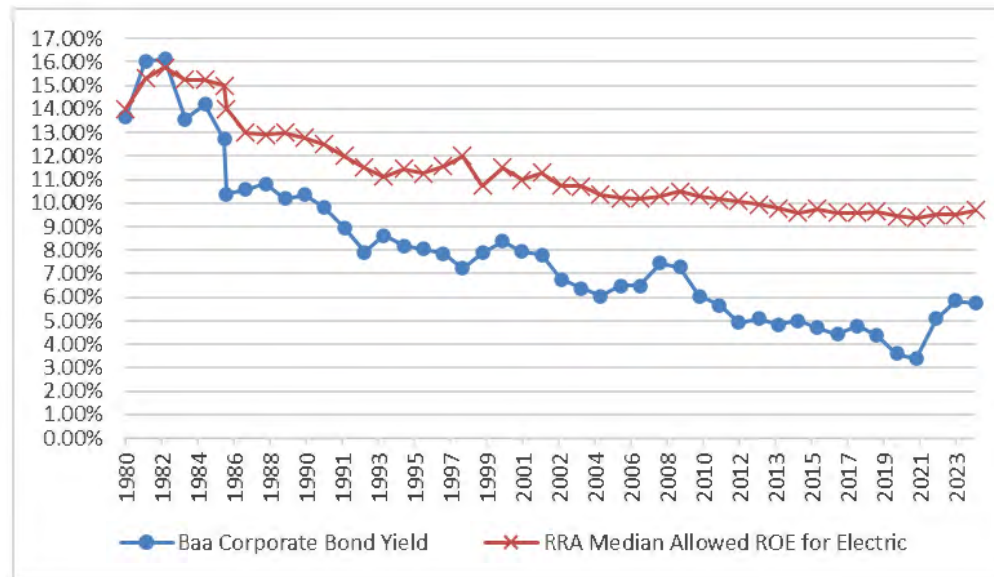
A. The first table below contains the allowed return on equity decisions made by this Commission in litigated rate cases. As a point of reference to the prevailing capital markets at that time, I included the yield on the Baa corporate bonds as of the month of the Commission's decision.

**Table: Commission Determined Allowed ROEs**

<b>Commission Determined, Allowed ROEs -- Kansas Utilities 25-EKCE-294-RTS</b>						
Company	Docket	Order Date	Requested ROE	Ordered ROE	Baa/BBB Corp Bond Yield	Risk Premium
Atmos Energy Corp.	19-ATMG-525-RTS	2/24/2020	10.25%	9.10%	3.51%	5.59%
Kansas City Power & Light	15-KCPE-116-RTS	9/10/2015	10.30%	9.30%	5.44%	3.86%
Atmos Energy Corp.	14-ATMG-320-RTS	9/4/2014	10.53%	9.10%	4.70%	4.40%
Kansas City Power & Light	12-KCPE-764-RTS	12/13/2012	10.40%	9.50%	4.66%	4.84%
Kansas City Power & Light	10-KCPE-415-RTS	11/22/2010	10.75%	10.00%	5.94%	4.06%
Westar Energy Inc.	05-WSEE-981-RTS	12/28/2005	11.50%	10.00%	6.35%	3.65%
Westar Energy Inc.	01-WSRE-436-RTS	7/25/2001	12.75%	11.02%	7.78%	3.24%
Kansas Gas Service Co.	193,305-U	4/15/1996	12.00%	10.50%	8.19%	2.31%
					Average	3.99%
Sources: S&P Capital IQ, reports on Kansas rate cases						
Moody's Seasoned Baa Corporate Bond Yield, Percent, Daily, Not Seasonally Adjusted; <a href="https://fred.stlouisfed.org">https://fred.stlouisfed.org</a>						

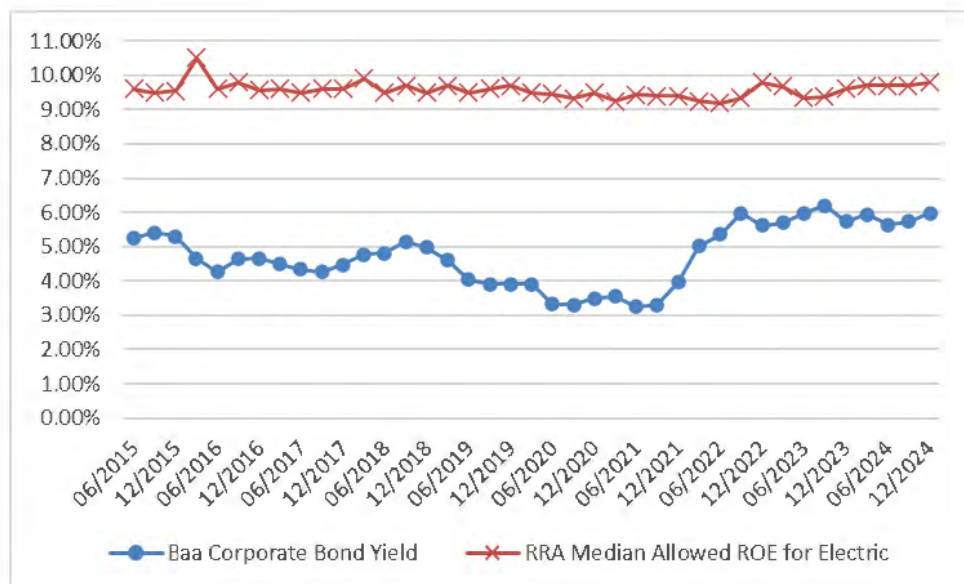
The following chart is broader in terms of both time and reporting scope. It indicates the median return on equity granted in fully litigated rate cases nationwide from 1980 through 2024. As a point of reference to the prevailing capital markets, I included the average yield to maturity of Baa corporate bonds reported by Moody's Analytics.

**Graph: Annual Median Allowed Returns Granted to Electric Utilities & Bond Yields 1980 - 2024**



The following chart highlights the last decade, from January 2014 through December 2024.

In writing this testimony in May of 2025, rates on corporate debt are 6.00%.



**Q. How does Staff's recommendation compare to the returns available on other investments?**

A. The following table shows Staff's recommendation of a 9.70% allowed ROE, which allows investors a risk premium over less risky debt investments detailed in the table. These income-producing securities are considered alternatives to investments in utility stocks because, like utility stocks, bonds offer stable valuations and higher current income relative to the equity market. Risk premiums vary over time and across market conditions; thus, no absolute benchmark risk premium sets a reasonable return on equity at a given interest rate, nor has the Commission set a policy of adopting a definitive spread over bond yields in ROE decisions.

**Table: Staff's Risk Premium Based on a 9.70% Allowed ROE**

<b>Staff's Risk Premium Over Fixed Income Yields Based on a 9.70% Allowed ROE 25-EKCE-294-RTS</b>		
	30 Year (1) Treasury Bond	Corp Bonds (2) Baa
Nov 2024	4.54%	5.78%
Dec 2024	4.58%	5.80%
Jan 2025	4.85%	6.08%
Feb 2025	4.68%	5.92%
Mar 2023	4.60%	5.93%
Apr 2025	4.71%	6.18%
	4.66%	5.95%
KCC Staff's Recommended ROE		9.70%
Average Yield on 30 Year Treasury Bond		4.66%
<b>Equity Risk Premium Over the 30-Year Treasury Bond Yield</b>		<b>5.04%</b>
KCC Staff's Recommended ROE		9.70%
Average Yield on "Baa" Rated Corporate Bonds		5.95%
<b>Equity Risk Premium Over "Baa" Corporate Bond Yield</b>		<b>3.75%</b>
1) Board of Governors of the Federal Reserve System, 30-Year Treasury Constant Maturity (Federal Reserve Bank of St. Louis, <a href="https://fred.stlouisfed.org">www.https://fred.stlouisfed.org</a> ) 2) Yield on Moody's Seasoned Baa rated Corporate Bonds; (Federal Reserve Bank of St. Louis, <a href="https://fred.stlouisfed.org">www.https://fred.stlouisfed.org</a> )		

The risk premiums from Commission decisions vary and as interest rates declined, the

1 premium grew larger. That same observation is apparent nationally in Commission  
2 determined ROEs seen in the earlier charts and research indicates the widening risk  
3 premium were excessive relative to the level of risk.<sup>54</sup>

4 **Q. How did you perform the cost of equity analysis?**

5 A. I am using CAPM and DCF models applied to the proxy group. This methodology is  
6 identical to that used by Staff and accepted by the Commission in recent rate cases.

7 **Q. Does the DCF model meet the legal standards discussed earlier in your testimony?**

8 A. Yes. A cost of equity estimate derived from the DCF model can meet the legal standards  
9 discussed above if it incorporates current information from the capital markets via current  
10 stock prices and accurate data investors use to establish their discount rate. This market-  
11 based information ensures that the cost of equity estimates evaluate investors' required rate  
12 of return or discount rate that reflects the current economic environment.

13 The DCF model is a valuation model used by investors to value different types of  
14 investments such as real estate, bonds, and equity securities. The DCF model is useful for  
15 valuing any investment involving regular, periodic cash flows. The notion of discounting  
16 a future receipt of cash back to the present to place a price or value on an investment goes  
17 back centuries.<sup>55</sup> The premise of the DCF model in the valuation of common stock is that  
18 investors determine the value of a company's common stock by discounting its future

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<sup>54</sup> Regulated Equity Returns: a Puzzle; Energy Policy; David C. Rode and Paul S. Fischbeck; 133, 2019.

<sup>55</sup> The formal presentation of the DCF model as we use it today dates back to the 1930's in Irving Fisher's book: The Theory of Interest and John Burr Williams' 1938 text: The Theory of Investment Value. These two authors expressed the DCF model in modern economic terms.



dividend payments back to the present. The foundation of the DCF model is the process of discounting those future cash flows back to the present at the investors' required return. An investor's required rate of return is risk-sensitive and sensitive to the returns available on investments of comparable risk throughout the global capital markets. In other words, as the risk of the investment increases, so will the investors' required return. A higher required return rate decreases the value of the stream of dividends, which equates to the stock price. So, all other variables being equal, investors price the riskier of the two common stocks lower because the dividends are discounted back to the present at a higher rate.

The form of the DCF model that regulatory agencies are accustomed to is referred to as the Gordon Growth Model, which is a model that values the security at the present value of a stream of cash flows (dividends) growing at a constant rate into perpetuity. The basic form of this DCF equation is:

$$P_0 = \frac{D_0(1 + g)}{(K_e - g)}$$

where:

$P_0$  = the value of the common stock or asset

$D_0$  = the current dividend of the stock or annual cash flow from the asset

$g$  = the annual growth rate of the dividend or cash flow forever

$K_e$  = cost of equity or required rate of return for the stockholders

Or

$$\text{Stock Price} = \text{Annual Dividend} / (\text{Req'd Rate of Return} - \text{Dividend Growth Rate})$$

This is the form of the equation commonly found in finance, investments, and asset valuation texts. Such texts include both theory and practical application of the DCF model in utility regulatory settings.

Regulatory agencies responsible for setting rates and revenue requirements want to know the investors' required rate of return, or  $K_e$ , in the equation. So, we solve the equation for that variable. The equation below shows the algebraic isolation of the investors' required rate of return. By isolating investors' required rate of return in the equation, we can estimate it by knowing the stock's dividend yield and the annual dividend growth rate expected by investors. That form of the equation is:

$$K_e = \frac{D_0(1+g)}{P_0} + g$$

This equation is frequently written out as:

Req'd Rate of Return = (Dividend/Current Stock Price) + Dividend Growth Rate

or

Required Rate of Return = Dividend Yield + Dividend Growth Rate

Or as commonly abbreviated by regulatory agencies

$$K_e = y + g$$

Where:  $y$  = Dividend Yield

$g$  = Expected Dividend Growth

Through a handful of inputs, the DCF model distills down to an equation, a complex intellectual process performed by investors to arrive at a discount rate and valuation of the security. As with any equation that attempts to model behavior, a host of assumptions comes with it.<sup>56</sup> Those assumptions are:

- $K_e$  corresponds only to the specific stream of future dividends, rather than earnings, and that constitutes the source of value;
- The discount rate ( $K_e$ ) must exceed the growth rate ( $g$ );
- The constant growth rate will continue for an indefinite future;
- Investors require the same discount rate ( $K_e$ ) each year; and

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<sup>56</sup> The Cost of Capital—A Practitioner's Guide; David Parcell; Prepared for the Society of Utility and Regulatory Financial Analysts; 1997 ed; p.8-5.

- There is no external financing.

**Q. Why is it reasonable to accept these assumptions?**

A. The DCF model attempts to emulate investors' behavior; distilling human behavior into a handful of inputs demands simplifying assumptions. The question becomes whether the assumptions are so contrary to investors' behavior in the real world that the model output becomes meaningless or illogical. The assumptions of the DCF model are not contrary to investor behavior, particularly concerning evaluating regulated public utilities. Furthermore, I do not know of any regulatory agency that has dismissed the DCF for being contrary to investor behavior. Moreover, there are methods to evaluate whether an output falls outside of the realm of reasonableness. For example, the output can be compared with the returns on other investments such as long-term corporate bonds.

### **Discounted Cash Flow Model**

**Q. How did you calculate the dividend yield (y) component of the DCF model?**

A. The dividend yield (y) is the easier of the two components to measure as it is easily observable in daily stock price reports. It is calculated by dividing the stock's annual dividend payment by its market price per share.

**Q. What is the source of dividend information?**

A. Historic and current dividend information is available from subscription and public services. The DCF model requires a forward-looking dividend payment. The current year's dividend payment is often increased by the forecasted growth rate for the next year. Instead of forecasting, I obtained the 2026 forecasted dividend per share information from

the Value-Line Investment Survey. The Value-Line reports for each Staff's Proxy Group company are attached as Schedule AHG-1. I obtained the stock prices for the dividend yields from NASDAQ.com. I used stock price observations from November 1, 2024, through April 29, 2025, for this analysis. The stock prices for each proxy company appear on Schedule AHG-2. The following table shows the range of dividend yields observed for Staff's Proxy Group during that period.

**Table: Dividend Yields of Staff's Proxy Group**

Dividend Yields Based on Prices from November 1, 2024 Through April 29, 2025 25-EKCE-294-RTS							
		1	2	3	4	5	
		DPS	Stock Prices		Dividend Yield		
		2026	Min	Max	Min	Max	
Alliant Energy Corporation	LNT	\$ 2.16	\$ 56.08	\$ 66.54	3.25%	3.85%	
Ameren Corporation	AEE	3.03	85.27	104.10	2.91%	3.55%	
American Electric Power Company	AEP	3.98	89.91	110.48	3.60%	4.43%	
Avista Corporation	AVA	2.10	34.80	43.09	4.87%	6.03%	
CMS Energy Corporation	CMS	2.30	63.97	76.45	3.01%	3.60%	
DTE Energy Company	DTE	4.71	115.59	140.39	3.35%	4.07%	
Duke Energy Corporation	DUK	4.30	105.20	125.27	3.43%	4.09%	
Entergy Corporation	ETR	2.55	66.85	88.38	2.89%	3.81%	
IDACORP, Inc.	IDA	3.65	100.10	120.84	3.02%	3.65%	
NextEra Energy, Inc.	NEE	2.50	61.72	79.89	3.13%	4.05%	
NorthWestern Corporation	NWE	2.68	50.43	59.89	4.47%	5.31%	
OGE Energy Corporation	OGE	1.73	39.10	46.91	3.69%	4.42%	
Pinnacle West Capital Corporation	PNW	3.67	81.47	96.50	3.80%	4.50%	
Portland General Electric Company	POR	2.21	40.05	36.66	6.03%	5.52%	
PPL Corporation	PPL	1.17	31.22	36.66	3.19%	3.75%	
Southern Company	SO	3.05	80.46	93.65	3.26%	3.79%	
Xcel Energy Inc.	XEL	2.42	62.58	73.38	3.30%	3.87%	
					2.89%	6.03%	
1) 2024 Dividends per Share Forecasted by Value-Line Investment Survey February, April, and May of 2025							
2) Minimum 6 month price observed from November 1, 2024 through April 29, 2025							
3) Maximum 6 month price observed from November 1, 2024 through April 29, 2025							
4) Minimum dividend yield available from time period							
5) Maximum dividend yield available from time period							

The dividend yields in this table are the minimum and maximum yields observed during the pricing period based on the dividends investors could expect to receive in 2026.

**Forecasted Growth Rates for the DCF Model**

1   **Q.     What is the importance of the second component, the growth rate (g), in the DCF**  
2       **equation?**

3   A.     The “g” represents the anticipated annual growth rate in cash flows that investors expect  
4       to receive through dividends from the stock. This is a challenging and contentious issue in  
5       a DCF analysis for two reasons. First, it is a critical element in the DCF model or any form  
6       of a discounted cash flow analysis because the growth rate has a one-for-one effect on the  
7       required return produced by the model. All other factors being equal, a higher growth rate  
8       results in a higher return on equity for the utility. Second, it is subjective due to uncertainty  
9       about future earnings, dividends, and the economy. As I discussed earlier in my testimony,  
10      the core disagreement with Ms. Bulkley’s DCF model and CAPM analysis relates to the  
11      data she relies on to estimate growth, which results in an unrealistically high estimate of  
12      long-run growth. The growth rates are the primary point of contention in determining the  
13      allowed ROE in rate cases before this Commission.

14   **Q.     How did you estimate the growth rate in the DCF model?**

15   A.     I relied on short-term and long-term growth forecasts, which investors apply to value  
16      common stocks. The appropriate growth estimate to use in the DCF model is the long-run  
17      growth rate expected by the market, which is factored into investors’ analyses to estimate  
18      stock prices. Earnings per share growth forecasts are commonly incorporated in the DCF  
19      model and are acceptable as a reasonable proxy for dividend growth. Investment analysts  
20      typically publish three- to five-year annual growth estimates for earnings. Value-Line  
21      Investment Survey also provides dividend growth rate forecasts; it is the only publication

1 I know that does so. I am unaware of any analysts or investment firms publishing  
2 company-specific earnings or dividend growth estimates further out than three to five  
3 years.

4 There are several sources for earnings growth estimates. My analysis incorporates short-  
5 term forecasts published by Value-Line Investment Survey, a consensus of analysts'  
6 forecasts published by FactSet as reported through S&P Capital IQ, and a consensus of  
7 analysts' forecasts published by Zacks Investment Research.

8 **Q. How do investors estimate the dividend growth rate beyond the three to five-year**  
9 **horizon of the short-term growth forecasts?**

10 A. For the long-term perspective of potential growth, investors rely on forecasts of the broad  
11 economy as measured by annual changes forecasted for the nation's GDP. There are  
12 sources for long-term growth estimates of this country's GDP that extend out more than 20  
13 years. Academic texts and investment professionals use these GDP forecasts to inform  
14 about the potential long-term growth of corporate dividend payments.

15 GDP refers to the market value of all final goods and services produced within a country  
16 in each period. Nominal GDP (nGDP) measures goods and services that *include* the effects  
17 of price changes, better known as inflation. Inflation must be included in our forecast  
18 because the DCF analysis is interested in the nominal required return. Investors'  
19 expectations of inflation are contained in their required return. The "headline" GDP  
20 reported in the media is *real* GDP, which is nGDP *minus* the inflation experienced over the  
21 period.

1 **Q. Is it a widely accepted practice in securities valuation to use nGDP growth estimates**  
2 **in the DCF model?**

3 A. Yes, in the federal regulatory arena, like the responsibilities of the KCC, FERC uses nGDP  
4 to estimate the cost of equity. FERC has revised the weighting of the nGDP growth  
5 occasionally. The important aspect of FERC's decision to include nGDP growth estimates  
6 is that such a view of long-term growth in valuing common stocks is consistent with  
7 investor behavior. FERC reached this conclusion via stakeholder comments, including  
8 state commissions, customers, investment bankers, and interstate pipeline companies.<sup>57</sup>  
9 Testimony from these parties made it clear that long-term estimates of nGDP are a  
10 component of valuation analyses conducted by investment professionals, and therefore,  
11 estimates of nGDP should be the estimate of long-term growth in the DCF models used to  
12 estimate required returns for interstate pipeline companies.<sup>58</sup> In June 2014, FERC  
13 concluded that the same methodology should be used in setting the required returns for  
14 electric transmission companies.<sup>59</sup> What is important to take away from FERC's adopting  
15 long-run nGDP forecasts is that it did so as to mirror the behavior of institutional investors.

16 **Q. Is there academic support for this issue?**

17 A. Academic research has shown that nGDP growth forecasts are essential to valuation  
18 studies. In two of his books devoted to asset valuation, Dr. Aswath Damodaran discusses

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<sup>57</sup> Transcript from Technical Conference held on January 23, 2008, FERC Docket PL07-2-000.

<sup>58</sup> Policy Statement, FERC Docket PL07-2-000 (April 17, 2008); FERC Opinion No. 486, FERC Docket RP04-274 (Oct. 19, 2006).

<sup>59</sup> Opinion No. 531, June 19, 2014, 147 FERC 61,234, para 36.

1 the nature of a stable growth rate for DCF models.<sup>60</sup> He argues for viewing nominal  
2 economic growth as the absolute maximum when using a stable-growth model, such as the  
3 DCF model we are using:

4 The stable growth rate cannot exceed the growth rate of the economy  
5 in which a firm operates, but it can be lower. There is nothing that  
6 prevents us from assuming that mature firms will become a smaller  
7 part of the economy and it may, in fact, be the more reasonable  
8 assumption to make. Note that the growth rate of an economy  
9 reflects the contributions of both young, higher growth firms and  
10 mature, stable growth firms. If the former grow at a rate much  
11 higher than the growth rate of the economy, the latter have to grow  
12 at a lower rate.<sup>61</sup>

13 The growth rate of a company cannot be greater than that of the  
14 economy but it can be less. Firms can become smaller over time  
15 relative to the economy. Thus, even though the cap on the growth  
16 rate may be the nominal growth rate of the economy, analysts may  
17 use growth rates much lower than this value for individual  
18 companies.<sup>62</sup>

19 Professor Damodaran cites the nGDP growth projection as a *ceiling* for long-term growth  
20 for most valuation studies. Indeed, some companies and industries will exceed the average  
21 for some time, but even for those, rapid growth cannot continue forever.

22 **Q. Does the view that nGDP growth is a ceiling on long-term earnings growth exist**  
23 **outside of academia?**

24 A. Yes, valuation analysts carefully consider the long-run growth rates used to value assets  
25 because using an incorrect growth estimate will lead to incorrectly valuing an asset.

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<sup>60</sup> Investment Valuation: Tools and Techniques for Determining the Value of Any Asset, 2<sup>nd</sup> Edition and  
Damodaran on Valuation: Security Analysis for Investment and Corporate Finance, 2<sup>nd</sup> Edition.

<sup>61</sup> Investment Valuation: Tools and Techniques for Determining the Value of Any Asset, 2<sup>nd</sup> Edition, Aswath  
Damodaran, p. 148.

<sup>62</sup> Damodaran on Valuation: Security Analysis for Investment and Corporate Finance, 2<sup>nd</sup> Edition, Aswath  
Damodaran, p.159.



1 Institutions directly involved in asset valuation and asset management that apply valuation  
2 models to analyze potential acquisition and merger transactions recognize that estimates of  
3 firm-specific growth are a driver to the value of an asset; overstating growth would cause  
4 a model to overestimate the value of the asset which would result in an economic loss to  
5 the investor. These experts also warn of a ceiling to earnings growth rates, as being no  
6 more than that of broad economic growth:

7 Growth rate: Few companies can be expected to grow faster than the economy  
8 for long periods. The best estimate is probably the expected long-term rate  
9 of consumption growth for the industry's products, plus inflation.<sup>63</sup>

10 The following quote from J.P. Morgan Asset Management (JPMAM) addresses the macro  
11 measures of profits; it is consistent with the firm-specific view expressed by asset valuation  
12 experts. JPMAN warns that analysts must be aware of the forecasted growth rates applied  
13 in valuation models and how those growth forecasts comport with broad measures of  
14 forecasted economic growth:

15 One common mistake is to assume that earnings and dividends received by  
16 investors can grow in line with—or even in excess of—overall economic  
17 growth (GDP) in perpetuity. Granted, it is almost a truism that aggregate  
18 earnings must grow at the same pace as the overall economy in the very  
19 long run; otherwise, profits would eventually outstrip the size of the entire  
20 economy or dwindle to an insignificant share of it. But not all of this  
21 earnings growth accrues to existing shareholders. On the contrary, a large  
22 portion of economic growth comes from the birth of new enterprises. Some  
23 commentators suggest (for example, Bernstein and Arnott, 2003; Cornell,  
24 2010) that new enterprises account for more than half of GDP growth in the  
25 U.S., while in some rapidly developing economies new enterprises may  
26 account for the lion's share of overall economic growth.<sup>64</sup>

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<sup>63</sup> Valuation: Measuring and Managing the Value of Companies, Tim Koller, Mark Goedhart, and David Wessels, McKinsey & Co; 4<sup>th</sup> ed. P. 275.

<sup>64</sup> Long-term Capital Market Return Assumptions: 2015 Estimates and Thinking Behind the Numbers, J.P. Morgan Asset Management, p. 25, <https://am.jpmorgan.com/us/institutional/lcmra>

1 Peter L. Bernstein and Robert Arnott, referenced in the quote, publish in peer-reviewed  
2 academic journals and books on investment strategy and have built their careers in asset  
3 management and investment strategy. Their research suggests that relying on nGDP as the  
4 long-term growth estimate could be overly optimistic. Specific to dividend growth  
5 expectations, their look at more than one hundred years of financial market returns and  
6 growth, found, “The history of dividend growth shows no evidence that dividends can ever  
7 grow materially faster than per capita GDP. Indeed, they almost always grow more  
8 slowly.”<sup>65</sup> Putting their findings into context, historical data beginning in 1947 indicates  
9 that per capita nGDP grew at an annual rate of 5.17%, whereas nGDP grew at an annual  
10 rate of 6.35%.<sup>66</sup> These historical growth rates are greater than those projected for the  
11 future.

12 Research by William J. Bernstein and Robert Arnott warns practitioners that a portion of  
13 nGDP growth is created by new enterprises. That portion of nGDP growth does not  
14 contribute to the earnings growth of existing enterprises. Thus, for existing companies,  
15 long-term earnings grow at a rate lower than nGDP.

16 Professional investment managers apply the same principles. JPMAM describes how they

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<sup>65</sup> Earnings Growth: The Two Percent Dilution, William J. Bernstein and Robert D. Arnott, Financial Analysts Journal, September/October 2003, pp 47-55.

What Risk Premium Is “Normal”?, Robert D. Arnott and Peter L. Bernstein; Financial Analysts Journal, March/April 2002, p.72.

<sup>66</sup> FRED Economic Data; Gross Domestic Product 1947 (\$259.745 Billion) through 2024 (\$29,719.647 Billion) results in a compound annual growth rate of 6.35%;

Gross Domestic Product per Capita 1947 (\$1,790) through 2024 (\$87,113) results in a compound annual growth rate of 5.17%

1 arrive at their equity market assumptions:<sup>67</sup>

2 Our framework begins with underlying economic activity—real GDP growth  
3 plus inflation—which we believe ultimately drives earnings growth in the long  
4 run.

5 Thus, it becomes clear that the linkage between expected economic growth and the growth  
6 potential of corporate earnings and dividends is more than just an academic principle in  
7 finance; professional money managers accept the relationship between GDP growth and  
8 corporate earnings growth when forming their long-run forecasts.

9 **Q. Do you believe this evidence justifies incorporating long-run nGDP growth forecasts**  
10 **into the cost of equity analyses of utility companies?**

11 A. Yes, we must do so because we must ascertain the discount rate investors apply to the  
12 future cash flows from an investment in the proxy group of natural gas companies. It is  
13 not a discount rate spanning merely three to five years, as Ms. Bulkley has built into her  
14 analyses; the time horizon of the DCF model is perpetuity, far beyond the three to five-  
15 year horizon of analysts' earnings growth forecasts. The Commission should emulate  
16 investors' analytical practices as closely as possible to determine investors' discount rates  
17 or required returns. As noted above, investment professionals include a long-run growth  
18 forecast for the broad economy when applying the DCF. That measure of macroeconomic

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<sup>67</sup> "Long-Term Capital Market Assumptions: 2014 Assumptions and the Thinking Behind the Numbers"; J.P. Morgan Asset Management, p. 50;  
[http://www.jpmorganinstitutional.com/pages/jpmorgan/am/ia/research\\_and\\_publications/long-term\\_capital\\_market](http://www.jpmorganinstitutional.com/pages/jpmorgan/am/ia/research_and_publications/long-term_capital_market)

growth serves as the upper bound of a firm-specific analysis. Therefore, the Commission should consider the same information when estimating a utility's required return.

**Q. How did you estimate long-run nGDP growth?**

A. I relied on several widely available sources: the long-run nGDP forecasts of the Energy Information Agency (EIA), the Congressional Budget Office (CBO), and the Social Security Administration (SSA). The average of these forecasts is 4.08% and composes the long-run growth estimate in the DCF analysis.

**Table: Long-Term Forecasts of nGDP Growth**

<u>Nominal GDP Estimates</u>	
Energy Information Agency (EIA) 2023 - 2050	4.29%
Congressional Budget Office Long-term Outlook 2024 - 2054	3.89%
Soc Sec Admin (SSA) OADSI Trustees Report 2024 - 2100	4.07%
Average of Forecasts	4.08%
Historical Compound Growth Rate 1929-2024	6.11%
Sources:	
EIA Annual Energy Outlook 2023	
An Update to the Economic Outlook: 2024-2054; CBO, July 2024	
OADSI Trustees Report Office of the Chief Actuary, Table V.B1-V.B2 (2024)	
BEA; Table 1.15 Gross Domestic Product	

**DCF Results**

**A. Please discuss the results of your DCF analysis.**

Q. The results of my DCF analysis appear in the following table. I have set out the foundations for the DCF analysis in the previous pages. In this section, I will discuss the specific information I relied on for the DCF model and interpret the results.

# 1     **Table: Discounted Cash Flow Analysis**

<b>Discounted Cash Flow Analysis 25-EKCE-294-RTS</b>						
		1	2	3	4	5
		Dividend Yields		Growth	DCF Estimated	
		Min	Max	Rate	Required Return	
Alliant Energy Corporation	LNT	3.25%	3.85%	5.23%	8.47%	9.08%
Ameren Corporation	AEE	2.91%	3.55%	5.41%	8.32%	8.96%
American Electric Power Company, Inc.	AEP	3.60%	4.43%	5.20%	8.80%	9.63%
Avista Corporation	AVA	4.87%	6.03%	4.78%	9.66%	10.82%
CMS Energy Corporation	CMS	3.01%	3.60%	5.31%	8.32%	8.91%
DTE Energy Company	DTE	3.35%	4.07%	4.88%	8.23%	8.95%
Duke Energy Corporation	DUK	3.43%	4.09%	4.82%	8.25%	8.91%
Entergy Corporation	ETR	2.89%	3.81%	5.43%	8.32%	9.24%
IDACORP, Inc.	IDA	3.02%	3.65%	5.57%	8.59%	9.22%
NextEra Energy, Inc.	NEE	3.13%	4.05%	6.22%	9.35%	10.27%
NorthWestern Corporation	NWE	4.47%	5.31%	4.39%	8.86%	9.70%
OGE Energy Corporation	OGE	3.69%	4.42%	4.84%	8.53%	9.26%
Pinnacle West Capital Corporation	PNW	3.80%	4.50%	3.73%	7.53%	8.23%
Portland General Electric Company	POR	6.03%	5.52%	4.58%	10.61%	10.10%
PPL Corporation	PPL	3.19%	3.75%	5.65%	8.84%	9.40%
Southern Company	SO	3.26%	3.79%	4.90%	8.15%	8.69%
Xcel Energy Inc.	XEL	3.30%	3.87%	5.65%	8.95%	9.52%
Average of each column					8.69%	9.35%
Average of all observations					9.02%	
1) Dividend divided by maximum price observed November 1, 2024 through April 29, 2025						
2) Dividend divided by minimum price observed November 1, 2024 through April 29, 2025						
3) Forecasted growth						
4) Low-end estimate = col 1 + col 3						
5) High-end estimate = col 2 + col 3						

I gathered the pricing data from NASDAQ.Com for each proxy company from November 1, 2024, through April 29, 2025. The 2026 annual dividend rate projections come from Value-Line Investment Survey.

## **Q. How did you arrive at a growth rate for each proxy company?**

A. The growth rate is the average of the short-term growth rates<sup>68</sup> and the long-run forecast of nGDP of 4.08%. The following table summarizes all the observed growth forecasts,

<sup>68</sup> For each proxy company, I gathered three short-run, three to five-year growth forecasts for earnings and dividend from Value-Line Investment Survey; as well as analysts' earnings growth projections by Zack's Investment Services aggregate analysts' earnings forecasts and reports the mean of those estimates. FactSet is a service similar to Zacks' in that they aggregate analysts' forecasts and publishes the mean and median of estimates. FactSet data was obtained through S&P Global Market Intelligence.

both historical and forecasted.

**Table: Historical and Forecasted Growth Rates of Staff's Proxy Group**

Growth Rate Summary 25-EKCE-294-RTS												
		Value-Line Historic Data				Forecasted Growth Rates				DCF		
		Earnings Growth		Dividend Growth		Value Line		Zacks	FactSet	Short-run	Long-term	Growth
		10 Year	5 Year	10 Year	5 Year	EPS	DPS	EPS	EPS	Average	nGDP	Rate
Alliant Energy Corporation	LNT	5.50%	4.50%	6.50%	6.00%	6.00%	6.00%	6.73%	6.71%	6.36%	4.09%	5.23%
Ameren Corporation	AEE	4.00%	8.00%	3.50%	5.00%	6.50%	6.50%	6.95%	6.95%	6.73%	4.09%	5.41%
American Electric Power Company, Inc.	AEP	5.00%	4.00%	5.00%	5.00%	6.50%	5.50%	6.43%	6.80%	6.31%	4.09%	5.20%
Avista Corporation	AVA	3.00%	-1.00%	4.00%	4.00%	5.50%	4.00%	6.43%	5.98%	5.48%	4.09%	4.78%
CMS Energy Corporation	CMS	6.50%	5.00%	6.50%	6.50%	6.00%	5.00%	7.84%	7.31%	6.54%	4.09%	5.31%
DTE Energy Company	DTE	4.00%	2.50%	5.50%	5.50%	4.50%	3.00%	7.64%	7.50%	5.66%	4.09%	4.88%
Duke Energy Corporation	DUK	3.00%	3.00%	2.50%	2.00%	6.00%	3.50%	6.33%	6.38%	5.55%	4.09%	4.82%
Entergy Corporation	ETR	2.50%	4.00%	2.50%	4.00%	3.00%	5.50%	9.46%	9.12%	6.77%	4.09%	5.43%
IDACORP, Inc.	IDA	4.00%	3.50%	7.50%	6.00%	6.00%	5.50%	8.47%	8.26%	7.06%	4.09%	5.57%
NextEra Energy, Inc.	NEE	9.50%	12.50%	11.00%	11.50%	8.50%	9.50%	7.72%	7.70%	8.36%	4.09%	6.22%
NorthWestern Corporation	NWE	2.50%	-1.00%	5.50%	3.00%	4.50%	1.50%	6.87%	5.85%	4.68%	4.09%	4.39%
OGE Energy Corporation	OGE	3.00%	4.50%	7.50%	6.50%	6.50%	3.00%	6.32%	6.53%	5.59%	4.09%	4.84%
Pinnacle West Capital Corporation	PNW	2.50%	0.00%	4.00%	4.00%	5.00%	1.50%	2.12%	4.83%	3.36%	4.09%	3.73%
Portland General Electric Company	POR	3.50%	3.00%	5.50%	5.50%	6.50%	5.50%	3.44%	4.82%	5.07%	4.09%	4.58%
PPL Corporation	PPL	-9.00%	-17.00%	-1.00%	-4.50%	7.50%	6.50%	7.46%	7.40%	7.22%	4.09%	5.65%
Southern Company	SO	3.00%	3.00%	3.50%	3.50%	6.50%	3.50%	6.55%	6.26%	5.70%	4.09%	4.90%
Xcel Energy Inc.	XEL	5.50%	6.00%	6.50%	6.50%	7.00%	6.50%	7.52%	7.84%	7.22%	4.09%	5.65%
	Min	-9.00%	-17.00%	-1.00%	-4.50%	3.00%	1.50%	2.12%	4.82%	3.36%		4.90%
	Max	9.50%	12.50%	11.00%	11.50%	8.50%	9.50%	9.46%	9.12%	8.36%		5.65%
	Mean	3.41%	2.62%	5.06%	4.71%	6.00%	4.82%	6.72%	6.84%	6.10%		5.40%

Columns: 1) - 6) Historic 5 & 10 Year & Forecasted 2028 -2030 growth rates as reported by Value-Line in February, March, and April of 2025, Historic data is not used in DCF calculations it is for comparative purposes only.

7) 5-year forecasted annual earnings per share growth rate. Consensus forecasts gathered by Zack's Investment Research

8) Long-term (3-5 year) forecasted annual earnings per share growth rate. Consensus forecasts gathered by FactSet and reported at S&P Global Market Intelligence on April 29, 2025

9) Average of 3 to 5-year forecasted annual growth rates (columns 5 through 9).

10) Long-term forecasted nominal GDP growth rate

11) Average of short-term and long-term growth rates.

**Q. How is the long-run nGDP forecast applied in your DCF analysis?**

A. In my DCF analysis, I give equal weight to short-run and long-run growth forecasts; the weighting is debatable. Whatever weighing an analyst applies between the short-term and long-term growth forecasts, the analysis needs to include the growth potential of each time horizon.

**Internal Rate of Return (IRR) Analysis**

1   **Q.     Please discuss the internal rate of return (IRR) analysis you performed.**

2   A.     An IRR analysis of an investment is a form of a DCF analysis, with a more complex  
3           equation than the Gordon Growth Model we applied in the earlier section. In the IRR  
4           analysis, we can apply the five-year growth forecasts to only the first five years of  
5           dividends, with the remaining years growing at the long-run nGDP forecasted growth rate  
6           of 4.08%. In the age of spreadsheets, a multi-stage DCF or the IRR equation is not much  
7           more complicated to manage than the single-stage dividend yield plus growth DCF model.  
8           The IRR model allows us to apply the growth forecasts to their respective forecast periods;  
9           the IRR model provides valuable information to policymakers because it recognizes the  
10          respective periods of both the short-run (three to five-year earnings growth) and long-run  
11          (nGDP growth rate) forecasts. The full output of the IRR calculations appears in Schedule  
12          AHG-3; the following table summarizes the results.

1     **Table: Internal Rate of Return Summary**

<b>Internal Rate of Return Analysis Summary 25-EKCE-294-RTS</b>		
Alliant Energy Corporation	LNT	8.04%
Ameren Corporation	AEE	7.71%
American Electric Power Company, Inc.	AEP	8.55%
Avista Corporation	AVA	10.06%
CMS Energy Corporation	CMS	7.78%
DTE Energy Company	DTE	8.12%
Duke Energy Corporation	DUK	8.17%
Entergy Corporation	ETR	7.82%
IDACORP, Inc.	IDA	7.88%
NextEra Energy, Inc.	NEE	8.33%
NorthWestern Corporation	NWE	9.30%
OGE Energy Corporation	OGE	8.50%
Pinnacle West Capital Corporation	PNW	8.28%
Portland General Electric Company	POR	10.41%
PPL Corporation	PPL	8.07%
Southern Company	SO	7.93%
Xcel Energy Inc.	XEL	8.20%
	Median	8.17%
	Mean	8.42%
	Min	7.71%
	Max	10.41%

2

3     In the IRR model, short-term growth forecasts receive less weight than in the previous DCF

4     analysis; five years of a several-hundred-year time horizon or five percent, as opposed to a

5     weighting of 50 percent that applied in the two-stage DCF model. As a result of the greater

6     weighting of the long-term growth estimate, the average for the proxy group in the IRR

7     analysis is 60 basis points lower than the two-stage DCF results. As I discussed earlier in

8     my testimony, Ms. Bulkley's analysis gives no weight to long-term growth; she assumes

9     the three-to-five-year growth forecasts continue indefinitely.



**Capital Asset Pricing Model Analysis**

1    **Q.    Why do you incorporate a capital asset pricing model (CAPM) analysis?**

2    A.    The CAPM, like the DCF equation, is a cornerstone of financial and valuation models. For  
 3        example, acquisition analyses by investment bankers involving Kansas utilities routinely  
 4        incorporated a CAPM analysis as a critical component of the valuation process. The  
 5        CAPM is a cornerstone finance tool because it explains the positive relationship between  
 6        risk and ROR required by investors.<sup>69</sup> It is appealing to regulators because it meets the  
 7        legal standards I discussed above, as it can be structured to incorporate current data from  
 8        the financial markets and the unique risks of the utility in question to provide an estimate  
 9        of the return required by investors to take on risk above that of the risk-free return on long-  
 10       term U.S. government bonds.

11                     $Ke = Rf + \text{Beta} (Rm - Rf)$  or

12                     $Ke = Rf + \text{Beta} (Rp)$

13                    Where:

14                     $Ke$  =        required return on equity

15                     $Rf$  =        return on a risk-free security

16                     $Rm$  =        an expected return from the market, such as the S&P 500 Index

17                     $Rp$  =        risk premium available to investors through buying common stocks instead of risk-free  
 18                    securities, calculated as  $Rm - Rf$

19                     $Beta$  =        volatility of the security's or portfolio's return relative to the volatility of the market's  
 20                    return, with the market beta equal to 1.0

21        **Return on a Risk-Free Security ( $Rf$ )**

22        The  $Rf$  estimate is the interest rate investors believe is a riskless return. It is accepted that  
 23        a debt instrument issued by the U.S. Government is risk-free, so it is a question of what  
 24        time horizon an investor should look at as a risk-free vehicle. An investment in U.S.

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<sup>69</sup> The theoretical support for the CAPM is the work done by Harry Markowitz ("Portfolio Selection," Journal of Finance, March, 1952). W.F. Sharpe added the concept of a risk-free rate of return to the Markowitz model ("A Simplified Model of Portfolio Analysis," Management Science, January, 1963).

1 Treasury Bonds is risk-free if the investor holds it until maturity, in which case the investor  
2 is certain to collect the interest payments regardless of changes in the bond's price. My  
3 CAPM analyses look at the yields and returns of long-term U.S. Treasury Bonds as  
4 representative of risk-free investment returns.

### 5 **Beta**

6 The beta coefficient measures the volatility of the return earned by the utility's stock  
7 relative to the volatility of the returns earned by the broader equity market. The broad  
8 equity market is the S&P 500 Index, the New York Stock Exchange Index, or a similar  
9 broad equities index. This measure provides a look at the risk and volatility of a stock  
10 relative to other investments. A stock with a beta of 1.00 has exhibited returns equally as  
11 volatile as the broad market, while a stock with a beta of 0.5 has exhibited returns half as  
12 volatile as the market.

### 13 **Rm**

14 Rm is the expected return on the stock market as measured by a broad market index such  
15 as the S&P 500. It represents the total return of the index's price change plus dividends  
16 earned for the year. An estimate for the market return can be developed using historical or  
17 forecasted data; Staff's CAPM analyses look at both.

### 18 **Rp**

19 Rp is the risk premium, the difference between investors' expected return from the stock  
20 market and their expected return from the risk-free investment. The risk premium is written  
21 as  $R_m - R_f$ . The market return and the risk-free return should be taken from the same period  
22 to accurately measure the additional return investors require to take the risk of common

1 stocks over the risk-free investment over that forecasted or historic period. Investors  
2 calculate the risk premium from the expected return on the market ( $R_m$ ) and the risk-free  
3 rate of return ( $R_f$ ).

4 **Q. Does the CAPM meet the *Hope-Bluefield* legal standards discussed earlier in your**  
5 **testimony?**

6 A. Yes, a cost of equity estimate derived from the CAPM meets those legal standards if the  
7 model incorporates current information from the capital markets that investors rely on to  
8 evaluate investment options. This market-based information ensures the cost of equity  
9 estimates evaluate investors' required rate of return or discount rate that reflects the current  
10 economic environment. The CAPM analysis includes the expected returns in the broad  
11 equity market, the return available on risk-free investment vehicles, and the beta  
12 coefficient.

13 **Q. Please discuss your CAPM analysis.**

14 A. I took two approaches to the CAPM analysis commonly found in both cost of capital  
15 studies in regulatory and asset-valuation arenas. The approaches are distinct perspectives  
16 of the securities market, and analysts use both approaches to make investment decisions.  
17 One approach offers a perspective of capital costs using purely historic measures of returns  
18 from the stock and bond markets. The second incorporates forecasted returns on the broad  
19 equity market indexes and government fixed-income securities published by institutional  
20 investment services. The difference between the two approaches highlights the difference  
21 in returns earned in the past compared to the returns that institutional investors expect going

forward. The average based on historic returns on equity capital is higher, 9.60% to 11.01%, compared to forecasted returns of 6.66% to 9.73%.

Both forms of my CAPM analysis incorporate the high, low, and average beta coefficients observed in the proxy group. Value-Line reports that the proxy group of natural gas utilities has an average beta coefficient of 0.90, ranging from 0.75 to 1.10. Evergy, Inc. has a beta of 0.95.

**Table: Staff's Proxy Group Beta Coefficients**

Proxy Group Beta Coefficients 25-EKCE-294-RTS		
Alliant Energy Corporation	LNT	0.95
Ameren Corporation	AEE	0.90
American Electric Power Company, Inc.	AEP	0.85
Avista Corporation	AVA	0.75
CMS Energy Corporation	CMS	0.90
DTE Energy Company	DTE	1.00
Duke Energy Corporation	DUK	0.90
Entergy Corporation	ETR	1.00
IDACORP, Inc.	IDA	0.75
NextEra Energy, Inc.	NEE	1.05
NorthWestern Corporation	NWE	0.80
OGE Energy Corporation	OGE	1.05
Pinnacle West Capital Corporation	PNW	0.80
Portland General Electric Company	POR	0.80
PPL Corporation	PPL	1.10
Southern Company	SO	0.95
Xcel Energy Inc.	XEL	0.75
	Mean	0.90
Source: Value-Line	Median	0.90
	Min	0.75
	Max	1.10

Notably, the beta coefficients of gas and electric companies have increased over the past six years. Staff's analysis and recommendation capture the increase in the relative risk of utility stocks.

1     **Q.     Please describe your forecasted CAPM analyses.**

2     A.     For the forecasted CAPM analyses, I obtained forecasts of long-run returns for common  
3           equity and U.S. Treasury Bonds from three distinct sources: J.P. Morgan Asset  
4           Management (JPMAM); BlackRock Investments (BlackRock); and Kroll Corporation  
5           (Kroll) (formerly, Duff & Phelps). BlackRock and JPMAM have more than \$11 trillion of  
6           assets under management with individual and institutional clients worldwide. Other asset  
7           managers like Vanguard Group, which has over \$8 trillion in assets under management,  
8           have similar expectations for long-term returns. Thus, it is reasonable to assume that their  
9           published forecasts influence investors' expectations beyond their client base, which has a  
10          large base of influence. JPMAM and BlackRock publish their views of long-run (more  
11          than 15 years) returns available for numerous asset classes. Their respective forecasts are  
12          similar, though not identical; they provide a range for long-run returns on asset classes by  
13          the largest asset management companies. As a third input of projected returns, I looked to  
14          Kroll, a global advisory and asset valuation service provider to the financial industry and  
15          corporations publishes market return forecasts from time to time, as it observes changes in  
16          the capital markets.

1     **Table: Summary of Market Returns Used in Staff's CAPM Studies**

Summary of Market Returns Used in CAPM Studies 25-EKCE-294-RTS	
<b><u>Forecasted Market Return 2025</u></b>	
J.P. Morgan (Oct 2024)	6.87%
Black Rock (Jan 2025)	7.00%
Kroll, Inc. (March 2025) 5.50% ERP + 4.91% Riskfree	10.41%
<b><u>Historic Market Returns 1928-2024</u></b>	
Arithmetic Returns	11.79%
Geometric Returns	9.94%
Reported by Damadoran Online <a href="https://pages.stern.nyu.edu/~adamodar/New_Home_Page/datafile/histretSP.html">https://pages.stern.nyu.edu/~adamodar/New_Home_Page/datafile/histretSP.html</a>	

2

3     **Q.     How is JPMAM data applied to the CAPM analysis?**

4     A.     For this CAPM analysis, we are interested in JPMAM's forecasted returns on U.S. common  
5           stock and U.S. Treasury Bonds to establish the expected return for the market. JPMAM  
6           publishes 10 to 15-year forecasts of expected returns on dozens of investment asset classes  
7           in its annual publication, the Long Term Capital Market Return Assumptions  
8           (LTCMRA).<sup>70</sup> JPMAM forecasts an annual return on common stocks of 6.87%.<sup>71</sup>  
9           Following the calculations and inputs through the CAPM equation in line 2 of the following

<sup>70</sup> J.P. Morgan Asset Management, Long-term Capital Market Return Assumptions, 2025 Edition, J.P. Morgan Asset Management (published October of 2024)

[www.jpmmorganinstitutional.com/pages/jpmorgan/am/ia/research\\_and\\_publications/long-term\\_capital\\_market](http://www.jpmmorganinstitutional.com/pages/jpmorgan/am/ia/research_and_publications/long-term_capital_market)

<sup>71</sup> The 6.87% expected market return is the average of J.P. Morgan's expected returns on small, mid, and large sized stocks.

<b><u>JPMAM Forecasted Returns 2025 Geometric</u></b>	
Small Capitalization Stocks	6.70%
Mid Capitalization Stocks	7.00%
Large Capitalization Stocks	6.90%
<b>Average</b>	<b>6.87%</b>
Intermediate Treasuries Return	3.80%
10y T-bond Yield Assumption	3.90%
LTCMA 2025; p10. Cycle-neutral average yield on 10year	

table, the forecasted return on a risk-free investment, 10-year U.S. Treasury Bonds, is subtracted from the expected return on common stocks, resulting in a risk premium of 3.07%. This risk premium is the added return necessary to induce investors to take on the added risk associated with common stocks over the risk-free investment in a U.S. Treasury Bond. The beta coefficient is applied to the risk premium to find how much of a risk premium is necessary for investors to take on the risks of investing in utility stocks instead of the risk-free U.S. Treasury Bond.

**Table: CAPM Incorporating J.P. Morgan Asset Management Forecasts**

Capital Asset Pricing Model -- Forecasted Risk Premium Using Forecasted Market Returns & Treasury Bond Yields 25-EKCE-294-RTS				
		Beta Coefficients		
		Low	High	Avg.
1)	Forecasted Returns on Common Stocks	6.87%	6.87%	6.87%
2)	Forecasted Total Return on 10-Year T-Bond	- 3.80%	3.80%	3.80%
3)	Equity Risk Premium	3.07%	3.07%	3.07%
4)	Beta Coefficient	X 0.75	1.10	0.90
5)	Beta Adjusted Risk Premium	2.30%	3.37%	2.76%
6)	Forecasted Yield on 10-Year T-Bonds	+ 3.90%	3.90%	3.90%
7)	For Cost of Equity	6.20%	7.27%	6.66%

1)	Forecasted 10 to 15-year annual geometric return on stocks J.P. Morgan Asset Management, 2025 Edition.
2)	Forecasted 10 to 15-year annual geometric return on intermediate term U.S. Government bonds by J.P. Morgan Asset Management 2025 Edition.
3)	Resulting risk premium (1-2).
4)	Range of beta coefficient range of Proxy Group
5)	Row 3 x Row 4 = asset specific risk premium.
6)	Forecasted yield on 10-Year U.S. Treasury bonds forecasted by J.P. Morgan Asset Management, 2025 Edition (page 10).
7)	Forecasted cost of equity capital row 5 + row 6.

Sources:

J.P. Morgan Asset Management, Long-term Capital Market Return Assumptions,  
2025 Edition, J.P. Morgan Asset Management

Beta coefficients gathered from Value-Line Investment Survey





1     A.     I relied on data published by Kroll, a global financial services company. Specific to cost  
2           of capital estimation, Kroll provides forward-looking estimates of an equity risk premium  
3           (ERP) and a risk-free return. As in the previous CAPM equations, the ERP plus the risk-  
4           free return equates to the expected return on common stocks. Kroll develops its forecast  
5           for risk-free returns. The beta coefficient of the particular asset (in this case, Staff's Proxy  
6           Group) is applied to the ERP, and the product is added to the risk-free rate of return. As  
7           capital markets change, Kroll adjusts its ERP and risk-free return estimates. Kroll  
8           recommends a risk-free rate of 3.50% as a long-term view of risk-free investment returns,  
9           with the caveat to use the spot yield on 20-year U.S. Treasury Bonds if it is greater than  
10          3.50%; at this time, it is 4.78%, so that is used in my analysis.

1 **Table: CAPM Incorporating Kroll, Inc.'s Forecasts**

**Capital Asset Pricing Model -- Kroll Forecasted Risk Premium  
Using Forecasted Market Returns & Treasury Bond Yields  
25-EKCE-294-RTS**

		Beta Coefficients		
		Low	High	Avg.
1)	Kroll U.S. ERP	5.50%	5.50%	5.50%
2)	Beta Coefficient	x 0.75	1.10	0.90
3)	Proxy Group Risk Premium	4.13%	6.05%	4.95%
4)	Kroll U.S. Risk-Free Rate of Return*	+ 4.78%	4.78%	4.78%
5)	Proxy Group Cost of Equity	8.91%	10.83%	9.73%

- 
- 1) Kroll U.S. Equity Risk Premium as of April 15, 2025
  - 2) Beta coefficient range of proxy group reported by Value-Line.
  - 3) Resulting risk premium for proxy group (1-2).
  - 4) Kroll U.S. Risk-Free Rate of Return 20 Year Treasury Bond May 7, 2025
  - 5) Forecasted Cost of Equity Range for Proxy Group
- 

Kroll recommends a risk-free rate of the higher of 3.50% OR spot market yield on 20-Year U.S. Treasury Bond. At May 7, 2025; spot yield was 4.78% (Federal Reserve

Sources:

<https://www.kroll.com/-/media/kroll-images/pdfs/kroll-increases-us-risk-free-rate.pdf>

<https://www.federalreserve.gov/releases/h15/>

Beta coefficients gathered from Value-Line Investment Survey

2

3 What is very apparent is that the models from all three of these sources project that future

4 returns on equity capital will be lower than the long-run historic returns discussed in the

5 next section. JPMAM and BlackRock's views of lower future returns relative to historic

6 returns are universally accepted across the investment banking and asset management

7 industry.

8 **Q. Does the historic CAPM corroborate the findings of your forecasted CAPM analyses?**

9 **A.** Only to a degree, the CAPM results using historical data from 1928 through 2024 are

1 greater than those found with the three scenarios using forecasted returns. I prepared two  
2 historical perspectives of returns: arithmetic and geometric. Arithmetic average returns are  
3 the mean or average of the annual returns, which is common when people refer to an  
4 average. The geometric average is the compound return earned over a span of time in  
5 question, in this instance, 1928 through 2024. These two return measures differ because  
6 of the volatility in annual returns on each asset class (common stocks and U.S. Treasury  
7 bonds). The greater the volatility in annual growth, the greater the difference between the  
8 arithmetic and geometric averages for those observations. In applying the CAPM, neither  
9 measure of returns reigns supreme, as academic papers have argued which view accurately  
10 portrays the past. Both methods offer a perspective of historical returns; the arithmetic  
11 average represents a year, and the geometric average is the average annual growth over a  
12 time span. Both averages are widely reported or easily calculated from publicly available  
13 data.

1 **Table: CAPM Incorporating Historical Data, 1928 - 2024**

<b>Capital Asset Pricing Model -- Historic Risk Premium Based on Historic Arithmetic Risk Premiums from 1928 to 2024 25-EKCE-294-RTS</b>			
	Beta Coefficients		
	Low	High	Avg.
1) Total Returns on Common Stocks	11.79%	11.79%	11.79%
2) Total Return on Government Bonds	-	4.86%	4.86%
3) Resulting Risk Premium		6.93%	6.93%
4) Beta Coefficient	x	0.75	1.10
5) Risk Premium		5.20%	7.62%
6) Historic Yield on Government Bonds	+	4.77%	4.77%
7) Forecasted Cost of Equity Based on Historic Returns		9.97%	12.39%
1) Historic returns on common stocks 1928-2024 2) Historic returns on intermediate-term government bonds 1928-2024 3) Resulting risk premium (1-2) 4) Beta coefficient range observed in the Proxy Group 5) Row 3 x Row 4 = Asset Specific Risk Premium 6) Historic year-end yield on intermediate-term government bonds 1928-2024 7) Forecasted cost of equity capital, row 5 + row 6 Sources: Damodaran Online <a href="http://pages.stern.nyu.edu/~adamodar/New_Home_Page/datafile/histretSP.html">http://pages.stern.nyu.edu/~adamodar/New_Home_Page/datafile/histretSP.html</a> Beta coefficients gathered from Value-Line Investment Survey			

2

**Capital Asset Pricing Model -- Historic Risk Premium  
Based on Historic Geometric Risk Premiums  
from 1928 to 2024  
25-EKCE-294-RTS**

		Beta Coefficients		
		Low	High	Avg.
1) Total Returns on Common Stocks		9.94%	9.94%	9.94%
2) Total Return on Government Bonds	-	4.57%	4.57%	4.57%
3) Resulting Risk Premium		5.37%	5.37%	5.37%
4) Beta Coefficient	x	0.75	1.10	0.90
5) Risk Premium		4.03%	5.91%	4.83%
6) Historic Yield on Government Bonds	+	4.77%	4.77%	4.77%
7) Forecasted Cost of Equity Based on Historic Returns		8.80%	10.68%	9.60%

- 
- 1) Historic returns on common stocks 1928-2024
  - 2) Historic returns on intermediate-term government bonds 1928-2024
  - 3) Resulting risk premium (1-2)
  - 4) Beta coefficient range observed in the Proxy Group
  - 5) Row 3 x Row 4 = Asset Specific Risk Premium
  - 6) Historic year-end yield on intermediate-term government bonds 1928-2024
  - 7) Forecasted cost of equity capital, row 5 + row 6
- 

Sources: Damodaran Online

[http://pages.stern.nyu.edu/~adamodar/New\\_Home\\_Page/datafile/histretSP.html](http://pages.stern.nyu.edu/~adamodar/New_Home_Page/datafile/histretSP.html)

Beta coefficients gathered from Value-Line Investment Survey

If we rely on purely historic data, regardless of whether it is based on arithmetic or geometric returns, we are assuming that certain trends, particularly economic growth, observed in the past 90 years, will continue at the historical level. It is well established that the U.S. economy is projected to grow more slowly than in the past. The projected growth rate is 4.08% over the next 30 years compared to the historic growth rate of 6.11%.<sup>72</sup> Beyond the change in economic growth, there is an issue with measuring those historic returns. Evidence shows that these frequently quoted historic returns do not

**Historical Nominal GDP (Billion \$'s)  
Compound Annual Growth Rate**

1929	\$	104.60	
2024	\$	29,183.80	<b>6.11%</b>

Source: Bureau of Economic Analysis

Table 1.15 Gross Domestic Product

[www.bea.gov](http://www.bea.gov)

1 present a complete picture, partly due to the beginning period often used in the  
2 calculation.<sup>73</sup> The simple step of beginning the measurement period in the 1920s raises  
3 questions about whether the time period is representative of all modern-era securities  
4 trading. Regardless of whether the 1920s is an appropriate point for measuring historical  
5 returns, historical returns are widely reported and frequently referred to in discussions of  
6 capital markets and potential returns. Some well-regarded financial publications focus  
7 solely on this era of historical data and how to apply it in cost of capital studies. Thus,  
8 measurements from this period influence expectations despite warnings surrounding  
9 historic economic growth rates and market returns. I agree that historical data is cited and  
10 studied, but it has significant limitations, and policymakers should give it only light  
11 consideration in their final decision.

12 **Q. Does that conclude your testimony?**

13 **A.** Yes, thank you.

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<sup>73</sup> McQuarrie, Edward F, "The Myth of 1926: How Much Do We Know Long-Term Returns on U.S. Stocks?" The Journal of Investing; Winter 2009, p. 96.





AMEREN NYSE-AEE						RECENT PRICE	98.84	P/E RATIO	20.3	(Trailing: 21.5 Median: 20.0)	RELATIVE P/E RATIO	1.13	DIV'D YLD	2.9%	VALUE LINE											
TIMELINESS	4	Lowered 12/29/23	High: 48.1	46.8	54.1	64.9	70.9	80.9	87.7	90.8	99.2	91.2	95.7	100.6			Target Price Range	2028 2029 2030								
SAFETY	1	Raised 9/10/21	Low: 35.2	37.3	41.5	51.4	51.9	63.1	58.7	69.8	73.3	69.7	67.0	86.8												
TECHNICAL	3	Lowered 2/21/25	<b>LEGENDS</b> — 35.70 x Dividends p sh ... Relative Price Strength Options: Yes Shaded area indicates recession																							
BETA	.90	(1.00 = Market)																								
<b>18-Month Target Price Range</b>																										
Low-High		Midpoint (% to Mid)																								
\$66-\$113		\$90 (-10%)																								
<b>2028-30 PROJECTIONS</b>																										
Price		Gain		Ann'l Total																						
High		145		12%																						
Low		115		7%																						
<b>Institutional Decisions</b>																										
1Q2024		2Q2024		3Q2024																						
to Buy		274		338																						
to Sell		321		269																						
Hld's(000)		218776		215842																						



**AMERICAN ELEC. PWR.** NDQ-AEP RECENT PRICE **106.29** P/E RATIO **18.4** (Trailing: 18.9 Median: 18.0) RELATIVE P/E RATIO **1.02** DIV'D YLD **3.6%** **VALUE LINE**

[illegible]

**18-Month Target Price Range**  
 Low-High Midpoint (% to Mid)  
 \$73-\$122 \$98 (-10%)

**2028-30 PROJECTIONS**

	Price	Gain	Ann'l Total Return
High	150	(+40%)	12%
Low	120	(+15%)	7%

**Institutional Decisions**

	10/2024	20/2024	30/2024
to Buy	661	695	712
to Sell	572	540	590
Hld's(000)	402930	404836	455335

**% TOT. RETURN 1/25**

	THIS STOCK	VL ARITH. INDEX
1 yr.	32.2	20.7
3 yr.	23.0	25.6
5 yr.	2.6	83.9

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	© VALUE LINE PUB. LLC	28-30
28.22	30.01	31.27	30.77	31.48	34.78	33.51	33.31	31.35	32.84	31.49	30.04	33.30	38.20	36.08	37.01	39.65	41.20	Revenues per sh	44.55
6.32	6.29	6.83	6.92	7.02	7.57	7.98	8.47	7.95	8.77	9.35	10.28	10.98	10.72	10.92	11.71	12.20	12.80	"Cash Flow" per sh	15.50
2.97	2.60	3.13	2.98	3.18	3.34	3.59	4.23	3.62	3.90	4.08	4.42	4.96	5.09	5.24	5.61	5.85	6.30	Earnings per sh <sup>A</sup>	7.50
1.64	1.71	1.85	1.88	1.95	2.03	2.15	2.27	2.39	2.53	2.71	2.84	3.00	3.17	3.37	3.57	3.80	3.98	Div'd Decl'd per sh <sup>B</sup> <sup>†</sup>	4.31
6.19	5.07	5.74	6.45	7.75	8.68	9.37	9.98	11.79	12.89	12.43	12.72	11.43	13.18	13.89	14.02	14.10	14.10	Cap'l Spending per sh	14.00
27.49	28.33	30.33	31.37	32.98	34.37	36.44	35.38	37.17	38.58	39.73	41.38	44.49	46.60	48.46	50.63	52.35	55.55	Book Value per sh <sup>C</sup>	60.90
478.05	480.81	483.42	485.67	487.78	489.40	491.05	491.71	492.01	493.25	494.17	496.60	504.21	513.87	526.18	532.9	535.00	540.00	Common Shs Outst'g <sup>D</sup>	550.00
10.0	13.4	11.9	13.8	14.5	15.9	15.8	15.2	19.3	18.0	21.4	19.6	17.1	21.1	16.2	16.2	<i><b>Bold figures are Value Line estimates</b></i>		Avg Ann'l P/E Ratio	18.0
.67	.85	.75	.88	.81	.84	.80	.80	.97	.97	1.14	1.01	.92	1.23	.93	.90			Relative P/E Ratio	1.00
5.5%	4.9%	5.0%	4.6%	4.2%	3.8%	3.8%	3.5%	3.4%	3.6%	3.1%	3.3%	3.5%	3.3%	4.5%	3.6%			Avg Ann'l Div'd Yield	3.3%

<b>CAPITAL STRUCTURE as of 12/31/24</b>	16453	16380	15425	16196	15561	14919	16792	19640	18982	19721	21200	22250	Revenues (\$mill)	24500
<b>Total Debt</b> \$41832 mill. <b>Due in 5 Yrs</b> \$12886 mill.	1763.4	2073.6	1783.2	1923.8	2019.0	2200.1	2448.1	2307.2	2208.1	2967.1	3130	3400	<b>Net Profit</b> (\$mill)	4125
<b>LT Debt</b> \$39308 mill. <b>LT Interest</b> \$1400 mill.														
	35.1%	26.8%	33.7%	5.8%	7.7%	1.9%	4.6%	NMF	NMF	NMF	21.0%	21.0%	<b>Income Tax Rate</b>	21.0%
	11.0%	8.0%	8.0%	10.7%	12.7%	9.7%	7.8%	7.0%	7.0%	7.0%	6.5%	6.0%	<b>AFUDC % to Net Profit</b>	5.0%
	49.8%	50.0%	51.5%	53.2%	56.1%	58.5%	58.3%	58.5%	58.2%	58.1%	58.0%	58.0%	<b>Long-Term Debt Ratio</b>	57.5%
<b>Leases, Uncapitalized</b> Annual rentals \$119.6 mill.	50.2%	50.0%	48.5%	46.8%	43.9%	41.5%	41.7%	42.0%	42.0%	42.4%	42.0%	42.0%	<b>Common Equity Ratio</b>	42.5%
	35633	34775	37707	40677	44759	49537	53734	57520	62837	67528	70730	72500	<b>Total Capital (\$mill)</b>	75900
<b>Pfd Stock</b> None	46133	45639	50262	55099	60138	63902	66001	71283	76693	82416	81250	84250	<b>Net Plant (\$mill)</b>	87300
	6.1%	7.2%	5.9%	5.9%	5.6%	5.6%	5.6%	4.0%	3.6%	4.1%	4.5%	4.5%	<b>Return on Total Cap'l</b>	5.0%
<b>Common Stock</b> 532,907,715 shs.	9.9%	11.9%	9.8%	10.1%	10.3%	10.7%	11.1%	9.7%	8.7%	11.0%	10.0%	10.0%	<b>Return on Shr. Equity</b>	11.0%
	9.9%	11.9%	9.8%	10.1%	10.3%	10.7%	11.1%	9.7%	8.7%	11.0%	10.0%	10.0%	<b>Return on Com Equity</b>	11.0%
<b>MARKET CAP: \$56.6 billion (Large Cap)</b>	3.9%	5.5%	3.2%	3.5%	3.4%	3.8%	4.3%	2.9%	2.4%	3.2%	4.0%	4.0%	<b>Retained to Com Eq</b>	4.5%
<b>ELECTRIC OPERATING STATISTICS</b>	60%	54%	67%	65%	67%	65%	61%	70%	63%	63%	63%	63%	<b>All Div'ds to Net Prof</b>	61%

	2020	2021	2022	<b>BUSINESS:</b> American Electric Power Company Inc. (AEP), through 10 operating utilities, serves 5.5 million customers in Arkansas, Kentucky, Indiana, Louisiana, Michigan, Ohio, Oklahoma, Tennessee, Texas, Virginia, & West Virginia. Has a transmission subsidiary. Electric revenue breakdown: residential, 43%; commercial, 23%; industrial, 18%; wholesale, 10%; other, 6%. Sold commercial barge operation in '15. Generating sources not available. Fuel costs: 33% of revenues. '23 reported depreciation rates (utility): 2.6%-12.5%. Has approximately 16,700 employees. Chief Executive Officer: William J. Fehrman. Incorporated: New York. Address: 1 Riverside Plaza, Columbus, Ohio 43215-2373. Telephone: 614-716-1000. Internet: <a href="http://www.aep.com">www.aep.com</a> .
% Change Retail Sales (KWH)	--	+3.0	--	
Avg. Indust. Use (MWH)	NA	NA	NA	
Avg. Indust. Revs. per KWH (c)	NA	NA	NA	
Capacity at Peak (Mw)	NA	NA	NA	
Peak Load (Mw)	NA	NA	NA	
Annual Load Factor (%)	NA	NA	NA	
% Change Customers (yr-end)	+1.0	NA	NA	
Fixed Charge Cov. (%)	243	272	285	
<b>ANNUAL RATES</b>	<b>Past</b>	<b>Past</b>	<b>Est'd '22-'24</b>	<b>We expect American Electric Power to post solid earnings in 2025.</b> Rate relief will help, as the company has multiple rate cases pending. The utility should also benefit from increased investment in its transmission business and volume growth throughout this year and beyond. Indeed, AEP recently revealed its plans to return
of change (per sh)	<b>10 Yrs.</b>	<b>5 Yrs.</b>	<b>to '28-'30</b>	
Revenues	5.0%	-5%	3.0%	
"Cash Flow"	5.0%	5.5%	5.5%	
Earnings	5.0%	4.0%	6.5%	
Dividends	5.0%	5.0%	5.5%	
Book Value	3.5%	3.5%	6.0%	
				and projects retail demand growth of up to 9% annually over the next three years. <b>These shares have risen nearly 10% in value since our early December review.</b> The stock is now up about 30% over the past year as the utility looks increasingly well positioned to benefit from its investments and power demand in

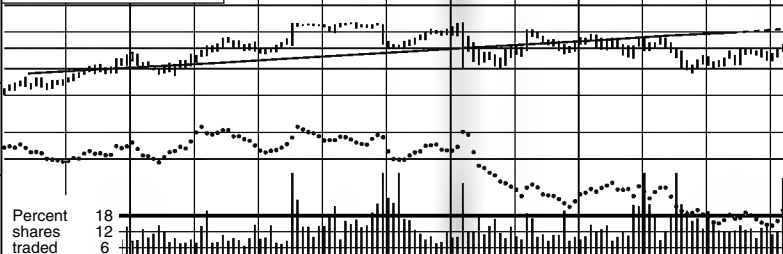
Calendar	QUARTERLY REVENUES (\$ mil.) <sup>a</sup>				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	4593	4640	5526	4881	19640
2023	4690	4373	5342	4577	18982
2024	5026	4579	5420	4696	19721
2025	5000	4900	5800	5500	21200
2026	5300	5200	5900	5850	22250

Calendar	EARNINGS PER SHARE <sup>a</sup>				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	1.22	1.20	1.62	1.05	5.09
2023	1.11	1.13	1.77	1.23	5.24
2024	1.27	1.25	1.85	1.24	5.61
2025	1.40	1.30	1.85	1.30	5.85
2026	1.50	1.45	1.95	1.40	6.30

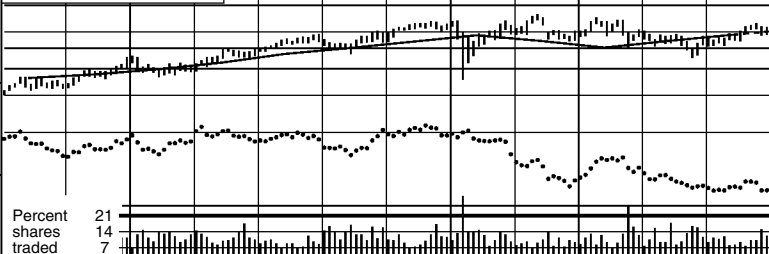
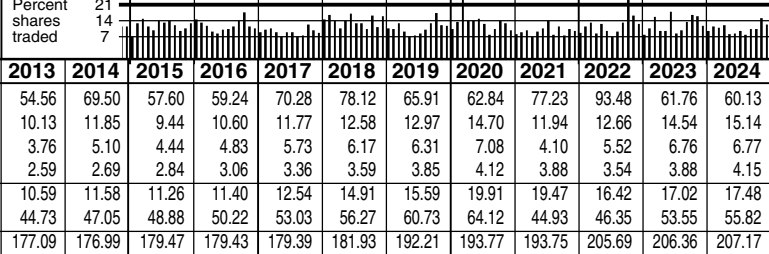
Calendar	QUARTERLY DIVIDENDS PAID \$ <sup>a</sup>				Full Year	the high end of AEP's targeted bottom-line growth range. The utility is considering adding \$10 billion to its record \$54 billion capital expenditure plan through the end of the decade as data center demand continues to ramp up significantly. AEP has 20 GW of new power load through 2029	Intermediate- and long-term capital appreciation potential is nothing exciting here. Indeed, after rolling out to 2028-2030, we expect the stock to trade around \$120-\$150 and earn about \$7.50 a share over that interim. <i>Zachary J. Hodgkinson      March 7, 2025</i>
	Mar.31	Jun.30	Sep.30	Dec.31			
2021	.74	.74	.74	.78	3.00		
2022	.78	.78	.78	.83	3.17		
2023	.83	.83	.83	.88	3.37		
2024	.88	.88	.88	.93	3.57		
2025	.93						

(A) Diluted EPS. Excl. nonrec. gains (losses): '10, (7c); '11, 89c; '12, (38c); '13, (14c); '16, (34c) Next earnings report due late May. million (D) In mill. (E) Rev. may not sum due to rounding.  
 (B) Div'ds paid early Mar., June, Sept., & Dec. Company's Financial Strength A  
 (C) Div'd reinvestment plan avail. † Shareholder Stock's Price Stability 95  
 invest. plan avail. (C) Incl. intang. In '23: \$52.5 Price Growth Persistence 45  
 Earnings Predictability 90  
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AVISTA CORP. NYSE-AVA						RECENT PRICE	39.56	P/E RATIO	16.2	(Trailing: 17.4 Median: 19.0)	RELATIVE P/E RATIO	1.03	DIV'D YLD	4.9%	VALUE LINE																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																											
TIMELINESS	3	Raised 3/14/25	High: 37.4	38.3	45.2	52.8	52.9	49.5	53.0	49.1	46.9	45.3	40.0	43.1			Target Price	Range																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
SAFETY	3	Lowered 1/19/24	Low: 27.7	29.8	34.3	37.8	41.9	39.8	32.1	36.7	35.7	30.5	31.9	34.8			2028	2029																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																								
TECHNICAL	4	Lowered 3/14/25	<div>LEGENDS</div> <div>25.00 x Dividends p sh divided by Interest Rate</div> <div>..... Relative Price Strength</div> <div>Options: Yes</div> <div>Shaded area indicates recession</div> 																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							





DTE ENERGY CO. NYSE-DTE						RECENT PRICE	132.38	P/E RATIO	18.9	(Trailing: 19.6 Median: 18.0)	RELATIVE P/E RATIO	1.05	DIV'D YLD	3.3%	VALUE LINE					
TIMELINESS	4	Lowered 11/29/24	High: 90.8 Low: 64.8	92.3 73.2	100.4 78.0	116.7 96.6	121.0 94.3	134.4 107.3	135.7 71.2	145.4 108.2	140.2 100.6	121.3 90.1	131.7 102.2	133.5 116.3			Target Price Range 2028 2029 2030			
SAFETY	2	Raised 12/21/12	LEGENDS 28.00 x Dividends p sh ..... Relative Price Strength Options: Yes Shaded area indicates recession																	
TECHNICAL	3	Lowered 2/21/25																		
BETA	1.00	(1.00 = Market)																		
18-Month Target Price Range																				
Low-High Midpoint (% to Mid)																				
\$100-\$150 \$125 (-5%)																				
2028-30 PROJECTIONS																				
Ann'l Total																				
Price Gain Return																				
High Low 200 145 (+50%) 13%																				
Low 145 (+10%) 6%																				
Institutional Decisions																				
1Q2024 2Q2024 3Q2024																				
to Buy 371 382 417																				
to Sell 287 316 300																				
Hld's(000) 162212 159667 183304																				
Percent shares traded																				
21 14 7																				
																				
2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026																				
© VALUE LINE PUB. LLC 28-30																				
48.45	50.51	52.57	51.01	54.56	69.50	57.60	59.24	70.28	78.12	65.91	62.84	77.23	93.48	61.76	60.13	65.20	67.90	Revenues per sh	75.25	
9.38	9.78	9.57	9.77	10.13	11.85	9.44	10.60	11.77	12.58	12.97	14.70	11.94	12.66	14.54	15.14	15.95	16.75	"Cash Flow" per sh	18.60	
3.24	3.74	3.67	3.88	3.76	5.10	4.44	4.83	5.73	6.17	6.31	7.08	4.10	5.52	6.76	6.77	7.20	7.75	Earnings per sh A	9.60	
2.12	2.18	2.32	2.42	2.59	2.69	2.84	3.06	3.36	3.59	3.85	4.12	3.88	3.54	3.88	4.15	4.41	4.71	Div'd Decl'd per sh B	5.15	
6.26	6.49	8.77	10.56	10.59	11.58	11.26	11.40	12.54	14.91	15.59	19.91	19.47	16.42	17.02	17.48	17.75	17.95	Cap'l Spending per sh	18.50	
37.96	39.67	41.41	42.78	44.73	47.05	48.88	50.22	53.03	56.27	60.73	64.12	44.93	46.35	53.55	55.82	58.40	60.30	Book Value per sh C	63.10	
165.40	169.43	169.25	172.35	177.09	176.99	179.47	179.43	179.39	181.93	192.21	193.77	193.75	205.69	206.36	207.17	205.50	205.50	Common Shs Outst'g D	206.00	
10.4	12.3	13.5	14.9	17.9	14.9	18.1	19.0	18.6	17.4	19.9	16.3	30.0	22.4	16.1	17.1	Bold figures are Value Line estimates		Avg Ann'l P/E Ratio	18.0	
.69	.78	.85	.95	1.01	.78	.91	1.00	.94	.94	1.06	.84	1.62	1.30	.92	.95			Relative P/E Ratio	1.00	
6.3%	4.8%	4.7%	4.2%	3.8%	3.5%	3.5%	3.3%	3.2%	3.3%	3.1%	3.6%	3.2%	3.4%	3.8%	3.3%			Avg Ann'l Div'd Yield	3.5%	
CAPITAL STRUCTURE as of 12/31/24						10337	10630	12607	14212	12669	12177	14964	19228	12745	12457	13400	13950	Revenues (\$mill)	15500	
Total Debt \$21986 mill. Due in 5 Yrs \$6481 mill.						796.0	868.0	1029.0	1120.0	1169.0	1368.0	796.0	1135.4	1395.0	1404.0	1480	1595	Net Profit (\$mill)	1980	
LT Debt \$20690 mill. LT Interest \$514 mill.						25.6%	24.5%	21.8%	8.1%	11.5%	10.9%	--	2.6%	4.8%	4.9%	5.0%	5.0%	Income Tax Rate	5.0%	
Incl. \$209 mill. securitization bonds. Incl. \$19 mill. finance leases.						4.3%	3.6%	3.5%	3.8%	3.3%	3.4%	4.9%	4.0%	3.2%	3.4%	3.0%	3.0%	AFUDC % to Net Profit	3.0%	
(LT interest earned: 1.7x)						50.2%	55.6%	56.2%	54.2%	57.7%	60.5%	62.5%	63.0%	61.2%	61.4%	61.5%	61.5%	Long-Term Debt Ratio	61.0%	
Leases, Uncapitalized Annual rentals \$16 mill.						49.8%	44.4%	43.8%	45.8%	42.3%	39.5%	37.5%	37.0%	38.0%	38.2%	38.5%	38.5%	Common Equity Ratio	39.0%	
Pension Assets-12/23 \$5507 mill.						17607	20280	21697	22371	27607	31426	23236	25158	26282	29328	30000	30700	Total Capital (\$mill)	32200	
Oblig \$5857 mill.						18034	19730	20721	21650	25317	27969	26944	28767	28169	31081	32250	33100	Net Plant (\$mill)	36600	
Pfd Stock None						5.7%	5.3%	5.9%	6.1%	5.3%	5.4%	4.7%	4.4%	5.0%	5.0%	5.0%	5.0%	Return on Total Cap'l	6.0%	
Common Stock 207,242,390 shs.						9.1%	9.6%	10.8%	10.9%	10.0%	11.0%	9.1%	13.0%	11.0%	11.3%	11.5%	11.5%	Return on Shr. Equity	12.5%	
MARKET CAP: \$27.4 billion (Large Cap)						9.1%	9.6%	10.8%	10.9%	10.0%	11.0%	9.1%	13.0%	11.0%	11.3%	11.5%	11.5%	Return on Com Equity E	12.5%	
ELECTRIC OPERATING STATISTICS						3.4%	3.7%	4.6%	4.9%	4.1%	4.9%	.1%	2.0%	4.0%	4.2%	4.5%	4.5%	Retained to Com Eq	4.5%	
2021 2022 2023						63%	61%	58%	55%	59%	56%	99%	76%	60%	60%	60%	60%	All Div'ds to Net Prof	62%	
% Change Retail Sales (KWH)						<b>BUSINESS:</b> DTE Energy Company is a holding company for DTE Electric (formerly Detroit Edison), which supplies electricity in Detroit and a 7,600-square-mile area in southeastern Michigan, and DTE Gas (formerly Michigan Consolidated Gas). Customers: 2.2 mill. electric, 1.3 mill. gas. Has various nonutility operations. Electric revenue breakdown: residential, 50%; commercial, 33%; industrial, 11%; other, 6%. Generating sources: coal, 67%; nuclear, 17%; gas, 1%; purchased, 15%. Fuel costs: 62% of revenues. '23 reported deprec. rates: 4.2% electric, 2.9% gas. Has 10,600 employees. Chairman, President & CEO: Jerry Norcia. Incorporated: Michigan. Address: One Energy Plaza, Detroit, Michigan 48226-1279. Tel.: 313-235-4000. Internet: www.dteenery.com.														
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. (%)																				
233 264 267																				
ANNUAL RATES																				
Past 10 Yrs. Past 5 Yrs. Est'd '21-'23																				
of change (per sh)																				
Revenues																				
"Cash Flow"																				
Earnings																				
Dividends																				
Book Value																				
3.0% 2.5% 5.0%																				
3.0% 4.5% 4.5%																				
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Cal-endar						Full Year														
QUARTERLY REVENUES (\$ mill.)																				
Mar.31 Jun.30 Sep.30 Dec.31																				
2022	4577	4924	5251	4476	19228															
2023	3779	2684	2888	3394	12745															
2024	3240	2875	2906	3436	12457															
2025	3200	3000	3100	4100	13400															
2026	3350	3200	3250	4150	13950															
Cal-endar						Full Year														
EARNINGS PER SHARE A																				
Mar.31 Jun.30 Sep.30 Dec.31																				
2022	2.03	.19	1.99	1.31	5.52															
2023	2.16	.97	1.61	2.02	6.76															
2024	1.51	1.55	2.30	1.41	6.77															
2025	1.85	1.45	2.30	1.60	7.20															
2026	1.95	1.50	2.50	1.80	7.75															
Cal-endar						Full Year														
QUARTERLY DIVIDENDS PAID B																				
Mar.31 Jun.30 Sep.30 Dec.31																				
2021	.9225	.9225	.9225	.825	3.59															
2022	.885	.885	.885	.885	3.54															
2023	.9525	.9525	.9525	1.02	3.88															
2024	1.02	1.02	1.02	1.09	4.15															
2025	1.09																			

**DTE Energy should post solid earnings growth in 2025.** In January, the Michigan Public Service Commission (MPSC) approved a \$217.4 million rate increase to improve reliability and reduce outages. The approval was for less than half of DTE's original request, and the new rates went into effect in early February. The utility remains committed to its plan to fully automate the grid within five to six years and is set to spend over \$100 million to build three new electric substations to further reduce power outage frequency by 30% and cut outage time in half by 2029. The company continues to be able to pass on higher costs associated with investments to the consumer through rate cases and infrastructure mechanisms. We look for full-year 2025 earnings of \$7.20, representing 6% growth from 2024 levels. Management is targeting a range of \$7.09-\$7.23 per share, supported by tax credits contributing \$50 million-\$60 million annually through 2027.

**We expect sharper bottom-line growth next year.** DTE Energy and its grid investments are increasingly well-positioned to benefit from increased demand for power over that interim. The utility increased its investment plan by \$5 billion, to \$30 billion over the next five years, to enhance grid reliability and support clean energy transitions. The updated plan includes \$10 billion of clean energy investments and \$24 billion to DTE Electric. Thus, we are introducing our 2026 earnings estimate of \$7.75 a share, indicating 7% growth, within the utility's 6%-8% long-term growth target.

**These shares have risen in value since our early December review.** The stock is up more than 5% in the past three months as DTE looks increasingly well-positioned to take advantage of elevated demand. It has now risen 23% over the past year.

**This issue is best suited for conservative, income-oriented investors.** Indeed, the stock is ranked 2 (Above Average) for Safety and holds a high (90) Price Stability score. What's more, the dividend yield of 3.3% is likely the most notable feature and is right around the industry-wide average. Plus, we look for the stock to trade around \$145-\$200 by 2028-2030.

*Zachary J. Hodgkinson March 7, 2025*



TIMELINESS		4	Lowered 10/4/24
SAFETY		2	New 6/1/07
TECHNICAL		2	Lowered 1/24/25
BETA		.90 (1.00 = Market)	
18-Month Target Price Range			
Low-High Midpoint (% to Mid)			
\$85-\$127 \$106 (-5%)			
2028-30 PROJECTIONS			
Ann'l Total			
Price Gain			
High 115 (+40%)			
Low 115 (Nil)			
Institutional Decisions			
to Buy 893			
to Sell 830			
Hld \$(000) 503341			
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IDACORP, INC. NYSE-IDA						RECENT PRICE	113.75	P/RATIO	19.6	(Trailing: 20.8 Median: 20.0)	RELATIVE P/E RATIO	1.24	DIV'D YLD	3.0%	VALUE LINE																	
TIMELINESS	3	Raised 4/4/25	High: 70.1	70.5	83.4	100.0	102.4	114.0	113.6	113.8	118.9	113.0	120.4	120.8			Target Price Range															
SAFETY	1	Raised 4/19/24	Low: 50.2	55.4	65.0	77.5	79.6	89.3	69.1	85.3	93.5	88.1	86.4	104.7			2028 2029 2030															
TECHNICAL	3	Lowered 3/14/25	<b>LEGENDS</b> 30.50 x Dividends p sh divided by Interest Rate ..... Relative Price Strength Options: Yes Shaded area indicates recession														200															
BETA	.75	(1.00 = Market)															160															
18-Month Target Price Range																	100															
Low-High Midpoint (% to Mid)																	80															
\$91-\$130 \$111 (-5%)																	60															
2028-30 PROJECTIONS																	50															
High Low Price Gain Ann'l Total Return																	40															
150 120 (+30%) 10%																	30															
120 (+5%) 5%																	20															
Institutional Decisions																	% TOT. RETURN 3/25															
2Q2024 3Q2024 4Q2024																	THIS STOCK VL ARITH. INDEX															
to Buy 191 226 235																	1 yr. 29.2 2.2															
to Sell 170 166 180																	3 yr. 10.7 12.5															
Hld's(000) 46039 51027 52388																	5 yr. 54.2 137.1															
Percent shares traded																																
2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	© VALUE LINE PUB. LLC	28-30													
21.92	20.97	20.55	21.55	24.81	25.51	25.23	25.04	26.76	27.19	26.70	26.77	28.86	32.51	34.90	33.85	35.95	37.25	Revenues per sh	39.90													
5.07	5.35	5.84	5.93	6.29	6.58	6.70	6.86	7.50	7.85	8.07	8.19	8.41	8.55	9.11	9.59	10.45	11.25	"Cash Flow" per sh	12.75													
2.64	2.95	3.36	3.37	3.64	3.85	3.87	3.94	4.21	4.49	4.61	4.69	4.85	5.11	5.14	5.50	5.80	6.30	Earnings per sh <sup>A</sup>	7.10													
1.20	1.20	1.20	1.37	1.57	1.76	1.92	2.08	2.24	2.40	2.56	2.72	2.88	3.04	3.20	3.35	3.52	3.65	Div'd Decl'd per sh <sup>B</sup> = †	4.20													
5.26	6.85	6.76	4.78	4.68	5.45	5.84	5.89	5.66	5.51	5.53	6.16	5.94	8.56	12.07	18.70	18.50	21.00	Cap'l Spending per sh	23.00													
29.17	31.01	33.19	35.07	36.84	38.85	40.88	42.74	44.65	47.01	48.88	50.73	52.82	55.52	57.44	61.73	66.65	70.00	Book Value per sh <sup>C</sup>	74.00													
47.90	49.41	49.95	50.16	50.23	50.27	50.34	50.40	50.42	50.42	50.42	50.46	50.52	50.56	50.62	53.96	54.00	55.00	Common Shs Outst'g <sup>D</sup>	56.00													
10.2	11.8	11.5	12.4	13.4	14.7	16.2	19.1	20.6	20.5	22.3	19.9	20.8	21.0	19.9	18.0	Bold figures are Value Line estimates		Avg Ann'l P/E Ratio	19.0													
.68	.75	.72	.79	.75	.77	.82	1.00	1.04	1.11	1.19	1.02	1.12	1.21	1.11	.95			Relative P/E Ratio	1.05													
4.5%	3.4%	3.1%	3.3%	3.2%	3.1%	3.1%	2.8%	2.6%	2.6%	2.5%	2.9%	2.9%	2.8%	3.1%	3.4%			Avg Ann'l Div'd Yield	3.1%													
CAPITAL STRUCTURE as of 12/31/24						1270.3	1262.0	1349.5	1370.8	1346.4	1350.7	1458.1	1644.0	1766.4	1826.6	1940	2050	Revenues (\$mill)	2235													
Total Debt \$3073.7 mill. Due in 5 Yrs \$136.2 mill.						194.7	198.3	212.4	226.8	232.9	237.4	245.6	259.0	261.2	289.2	315	345	Net Profit (\$mill)	400													
LT Debt \$3053.8 mill. LT Interest \$139.2 mill.						19.0%	15.5%	18.6%	7.1%	9.5%	10.8%	13.1%	12.7%	9.4%	4.9%	13.0%	13.0%	Income Tax Rate	13.0%													
(Total Interest Coverage: 2.5x)						16.3%	16.3%	13.9%	15.2%	16.2%	17.3%	17.7%	19.8%	8.8%	8.8%	9.0%	9.0%	AFUDC % to Net Profit	12.0%													
Pension Assets-12/24 \$951.1 mill.						45.6%	44.8%	43.7%	43.6%	41.3%	43.9%	42.8%	43.9%	48.8%	47.8%	46.0%	44.5%	Long-Term Debt Ratio	43.0%													
Oblig \$998.0 mill.						54.4%	55.2%	56.3%	56.4%	58.7%	56.1%	57.2%	56.1%	51.2%	52.2%	54.0%	55.5%	Common Equity Ratio	57.0%													
Pfd Stock None						3783.3	3898.5	3997.5	4205.1	4201.3	4560.4	4669.1	5001.4	5683.4	6384.7	6675	6950	Total Capital (\$mill)	7300													
Common Stock 53,977,012 shs.						3992.4	4172.0	4283.9	4395.7	4531.5	4709.5	4901.8	5173.0	5745.2	6517.3	7275	8000	Net Plant (\$mill)	9000													
as of 2/14/25						6.2%	6.1%	6.3%	6.4%	6.5%	6.1%	6.2%	6.1%	5.4%	5.6%	4.5%	5.0%	Return on Total Cap'l	5.5%													
MARKET CAP: \$6.1 billion (Mid Cap)						9.5%	9.2%	9.4%	9.6%	9.4%	9.3%	9.2%	9.2%	9.0%	8.7%	8.5%	9.0%	Return on Shr. Equity	9.5%													
ELECTRIC OPERATING STATISTICS						9.5%	9.2%	9.4%	9.6%	9.4%	9.3%	9.2%	9.2%	9.0%	8.7%	8.5%	9.0%	Return on Com Equity <sup>E</sup>	9.5%													
2022 2023 2024						4.8%	4.3%	4.4%	4.4%	4.2%	3.9%	3.7%	3.7%	3.4%	3.4%	3.5%	4.0%	Retained to Com Eq	4.0%													
% Change Retail Sales (KWH)						50%	53%	53%	54%	56%	58%	60%	60%	63%	61%	61%	57%	All Div'ds to Net Prof	59%													
Avg. Indust. Use (MWH)						<b>BUSINESS:</b> IDACORP, Inc. is a holding company for Idaho Power Company, a regulated electric utility that serves 649,000 customers throughout a 24,000-square-mile area in southern Idaho and eastern Oregon (population: 1.4 million). Most of the company's revenues are derived from the Idaho portion of its service area. Revenue breakdown: residential, 38%; commercial, 22%; industrial, 15%; irrigation, 11%; other, 14%. Generating sources: hydro, 54%; steam fired, 18%; gas, 28%; purchased, 33%. Fuel costs: 14% of revenues. <sup>24</sup> depreciation rate: 12.2%. Has 2,141 employees. Chairman: Dennis L. Johnson. President & CEO: Lisa A. Grow. Incorporated: Idaho. Address: 1221 W. Idaho St., Boise, Idaho 83702. Telephone: 208-388-2200. Internet: www.idacorpinc.com.																										
Avg. Indust. Revs. per KWH (c)																																
Capacity at Peak (Mw)																																
Peak Load, Summer (Mw)																																
Annual Load Factor (%)																																
% Change Customers (yr-end)																																
Fixed Charge Cov. (%)						395	315	328																								
ANNUAL RATES						Past 10 Yrs.	Past 5 Yrs.	Est'd '22-'24																								
of change (per sh)						3.5%	4.5%	3.5%																								
Revenues						4.0%	3.0%	6.0%																								
"Cash Flow"						4.0%	3.5%	6.0%																								
Earnings						7.5%	6.0%	5.5%																								
Dividends						4.5%	4.5%	4.5%																								
Book Value																																
Cal-endar	QUARTERLY REVENUES(\$ mill.)				Full Year																											
	Mar.31	Jun.30	Sep.30	Dec.31																												
2022	344.3	358.7	518.0	422.9	1644.0																											
2023	429.7	413.8	510.9	412.0	1766.4																											
2024	448.9	451.1	528.5	398.1	1826.6																											
2025	475	475	550	440	1940																											
2026	500	520	550	480	2050																											
Cal-endar	EARNINGS PER SHARE <sup>A</sup>				Full Year																											
	Mar.31	Jun.30	Sep.30	Dec.31																												
2022	.91	1.27	2.10	.83	5.11																											
2023	1.11	1.35	2.07	.61	5.14																											
2024	.95	1.71	2.12	.70	5.50																											
2025	1.05	1.80	2.25	.70	5.80																											
2026	1.10	1.85	2.50	.85	6.30																											
Cal-endar	QUARTERLY DIVIDENDS PAID <sup>B</sup> = †				Full Year																											
	Mar.31	Jun.30	Sep.30	Dec.31																												
2021	.71	.71	.71	.75	2.88																											
2022	.75	.75	.75	.79	3.04																											
2023	.79	.79	.79	.83	3.20																											
2024	.83	.83	.83	.86	3.35																											
2025	.86																															

**IDACORP's near-term profits will likely grow at a mid- to high-single-digit pace.** Solid electric revenue growth across its residential, commercial, industrial, and irrigation customer segments continues to support the utility's strong performance. During 2024, IDACORP achieved a more than 3% year-over-year revenue increase. Meanwhile, the bottom line advanced at a faster pace, to \$5.50 per share. The company has benefited from rising customer counts, elevated customer usage, partly due to warmer weather, and rate increases approved by regulators earlier this year. Considering the recent performance, management expects 2025 share earnings in the \$5.65-\$5.85 range, assuming normal weather. IDACORP is well positioned for continued top- and bottom-line growth despite elevated infrastructure costs. All told, we estimate share earnings of \$5.80 in 2025 and \$6.30 in 2026, reflecting gains of over 5% and 8%, respectively. **Capital investment should remain a key focus here.** IDACORP plans to allocate \$1.0 billion-\$1.1 billion in capital spending during 2025, followed by \$1.25 billion-\$1.35 billion in 2026, and \$3.1 billion-\$3.6 billion from 2027 through 2029. In all, the company expects to invest up to \$6.1 billion over the next five years. These expenditures are expected to support upcoming rate cases, as utilities are incentivized for such investments. **The company also provided updates on the progress of its major transmission projects.** IDACORP is advancing two large-scale high-voltage transmission lines. The 300-mile Boardman-to-Hemingway project, linking northeastern Oregon to southwestern Idaho, began early-stage work and is slated for construction in the summer of 2025, with completion expected in or after 2027. Separately, in February 2025, the utility committed to a partial ownership stake in the 285-mile SWIP-N project, connecting Nevada and Idaho. Its construction is anticipated to start this year and take about two years to complete. IDACORP will fund approximately 11% of total project costs. **High-quality shares of IDACORP have a subpar dividend yield for a utility company.**

*Emma Jalees*  
*April 18, 2025*

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<b>NORTHWESTERN</b> NDQ-NWE	RECENT PRICE <b>54.72</b>	P/E RATIO <b>16.0</b> (Trailing: 16.7 Median: 17.0)	RELATIVE P/E RATIO <b>1.01</b>	DIV/D YLD <b>4.8%</b>	<b>VALUE LINE</b>
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<b>TIMELINESS</b>	<b>3</b>	Lowered 4/11/24																	<b>Target Price Range</b>				
<b>SAFETY</b>	<b>2</b>	Raised 10/18/24																	<b>2028</b>	<b>2029</b>	<b>2030</b>		
<b>TECHNICAL</b>	<b>3</b>	Raised 4/18/25																					
<b>BETA</b>	.80	(1.00 = Market)																					
<b>18-Month Target Price Range</b>																							
<b>Low-High</b>	<b>Midpoint (% to Mid)</b>																						
<b>\$42-\$67</b>			<b>\$55 (0%)</b>																				
<b>2028-30 PROJECTIONS</b>																							
	<b>Price</b>	<b>Gain</b>	<b>Ann'l Total</b>																				
<b>High</b>	<b>75</b>	<b>(+35%)</b>	<b>12%</b>																				
<b>Low</b>	<b>55</b>	<b>(Nil)</b>	<b>5%</b>																				
<b>Institutional Decisions</b>																							
	<b>2Q2024</b>	<b>3Q2024</b>	<b>4Q2024</b>																				
<b>To Buy</b>	158	160	173																				
<b>To Sell</b>	134	139	138																				
<b>Hld's(000)</b>	58903	67655	69941																				
			<b>Percent</b>	<b>30</b>																			
			<b>shares</b>	<b>20</b>																			
			<b>traded</b>	<b>10</b>																			





<b>PINNACLE WEST</b> NYSE-PNW	RECENT PRICE	<b>89.62</b>	P/E RATIO	<b>18.7</b> (Trailing: 17.2) Median: 17.0	RELATIVE P/E RATIO	<b>1.18</b>	DIV'D YLD	<b>4.0%</b>	<b>VALUE LINE</b>
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2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	© VALUE LINE PUB. LLC	28-30
32.50	30.01	29.67	30.09	31.35	31.58	31.50	31.42	31.90	32.93	30.87	31.81	33.66	38.21	41.40	43.03	<b>43.00</b>	<b>45.10</b>	Revenues per sh	<b>51.60</b>
8.08	6.85	7.52	7.92	8.15	8.09	9.09	9.39	9.92	10.37	10.69	10.97	11.84	11.50	11.95	13.14	<b>12.85</b>	<b>13.60</b>	"Cash Flow" per sh	<b>16.25</b>
2.26	3.08	2.99	3.50	3.66	3.58	3.92	3.95	4.43	4.54	4.77	4.87	5.47	4.26	4.41	5.24	<b>4.80</b>	<b>5.15</b>	Earnings per sh <sup>A</sup>	<b>6.25</b>
2.10	2.10	2.10	2.67	2.23	2.33	2.44	2.56	2.70	2.87	3.04	3.23	3.36	3.43	3.49	3.55	<b>3.61</b>	<b>3.67</b>	Div'd Decl'd per sh <sup>B</sup> ■	<b>3.85</b>
7.64	7.03	8.26	8.24	9.36	8.38	9.84	11.64	12.80	10.73	10.76	11.93	13.04	15.09	16.28	18.89	<b>16.75</b>	<b>17.00</b>	Cap'l Spending per sh	<b>17.50</b>
32.69	33.86	34.98	36.20	38.07	39.50	41.30	43.15	44.80	46.59	48.30	49.96	52.26	53.45	54.47	56.71	<b>58.00</b>	<b>58.75</b>	Book Value per sh <sup>C</sup>	<b>70.00</b>
101.43	108.77	109.25	109.74	110.18	110.57	110.98	111.34	111.75	112.10	112.44	112.76	113.01	113.17	113.42	119.10	<b>120.50</b>	<b>122.00</b>	Common Shs Outst'g <sup>D</sup>	<b>125.00</b>
13.7	12.6	14.6	14.3	15.3	15.9	16.0	18.7	19.3	17.8	19.4	16.7	14.1	17.1	17.4	15.3	<b>Bold figures are Value Line estimates</b>		Avg Ann'l P/E Ratio	<b>18.00</b>
.91	.80	.92	.91	.86	.84	.81	.98	.97	.96	1.03	.86	.76	.99	.97	.81			Relative P/E Ratio	<b>1.00</b>
6.8%	5.4%	4.8%	5.3%	4.0%	4.1%	3.9%	3.5%	3.2%	3.5%	3.3%	4.0%	4.3%	4.7%	4.5%	4.4%			Avg Ann'l Div'd Yield	<b>3.4%</b>

<b>CAPITAL STRUCTURE as of 12/31/24</b>	3495.4	3498.7	3565.3	3691.2	3471.2	3587.0	3803.8	4324.4	4696.0	5124.9	<b>5180</b>	<b>5500</b>	Revenues (\$mill)	<b>6450</b>
<b>Total Debt</b> \$9427.1 mill. <b>Due in 5 Yrs</b> \$2794.0 mill.	437.3	442.0	497.8	511.0	538.3	550.6	618.7	483.6	501.6	608.8	<b>575</b>	<b>625</b>	Net Profit (\$mill)	<b>780</b>
<b>LT Debt</b> \$8058.6 mill. <b>LT Interest</b> \$400.0 mill.	34.3%	33.9%	32.5%	20.2%	-	12.1%	14.8%	13.0%	12.9%	15.0%	<b>15.0%</b>	<b>15.0%</b>	Income Tax Rate	<b>15.0%</b>
(Total Interest Coverage: 2.7x)	11.8%	14.1%	13.9%	15.2%	9.3%	9.5%	10.1%	15.2%	19.3%	14.3%	<b>15.0%</b>	<b>15.0%</b>	AFUDC % to Net Profit	<b>15.0%</b>
<b>Leases, Uncapitalized</b> Annual rentals \$20.1 mill.	43.0%	45.6%	48.9%	47.0%	47.1%	52.8%	53.9%	56.1%	55.0%	54.4%	<b>55.5%</b>	<b>57.0%</b>	Long-Term Debt Ratio	<b>55.0%</b>
	57.0%	54.4%	51.1%	53.0%	52.9%	47.2%	46.1%	43.9%	45.0%	45.6%	<b>44.5%</b>	<b>43.0%</b>	Common Equity Ratio	<b>45.0%</b>
<b>Pension Assets-12/24</b> \$2639.9 mill.	8046.3	8825.4	9796.4	9861.1	10263	11948	12820	13790	13718	14813	<b>15800</b>	<b>16725</b>	Total Capital (\$mill)	<b>19500</b>
<b>Oblig.</b> \$2792.3 mill.	11809	12714	13445	14030	14523	15159	15987	16854	17980	19198	<b>20225</b>	<b>21250</b>	Net Plant (\$mill)	<b>24150</b>
<b>Pfd Stock</b> None	6.4%	6.0%	6.1%	6.2%	6.3%	5.5%	5.8%	4.5%	4.9%	5.5%	<b>5.0%</b>	<b>5.0%</b>	Return on Total Cap'l	<b>5.5%</b>
<b>Common Stock</b> 119,099,064 shs.	9.5%	9.2%	9.9%	9.8%	9.9%	9.8%	10.5%	8.0%	8.1%	9.0%	<b>8.0%</b>	<b>8.5%</b>	Return on Shr. Equity	<b>9.0%</b>
<b>as of 2/20/25</b>	9.5%	9.2%	9.9%	9.8%	9.9%	9.8%	10.5%	8.0%	8.1%	9.0%	<b>8.0%</b>	<b>8.5%</b>	Return on Com Equity <sup>E</sup>	<b>9.0%</b>
<b>MARKET CAP: \$10.6 billion (Large Cap)</b>	3.9%	3.5%	4.2%	3.9%	3.8%	3.5%	4.2%	1.7%	1.9%	3.2%	<b>2.0%</b>	<b>2.5%</b>	Retained to Com Eq	<b>3.5%</b>
<b>ELECTRIC OPERATING STATISTICS</b>	59%	62%	58%	60%	61%	64%	60%	78%	77%	65%	<b>75%</b>	<b>71%</b>	All Div'ds to Net Prof	<b>61%</b>

	2022	2023	2024	<b>BUSINESS:</b> Pinnacle West Capital Corporation is a holding company for Arizona Public Service Company (APS), which supplies electricity to 1.4 million customers in most of Arizona, except about half of the Phoenix metro area, the Tucson metro area, and Mohave County in northwestern Arizona. Discontinued SunCor real estate subsidiary in '10. Electric revenue breakdown: residential, 50%; commercial/industrial, 46%; other, 4%. Generating sources: gas, 24%; nuclear, 21%; coal, 14%; renewables, 19%; purchased, 22%. Fuel costs: 36% of revenues. '24 reported deprec. rate: 3.13%. Has 6,403 employees. Chairman, President & CEO: Ted Geisler. Inc.: AZ. Address: 400 North Fifth St., P.O. Box 53999, Phoenix, AZ 85072-3999. Tel.: 602-250-1000. Internet: <a href="http://www.pinnaclewest.com">www.pinnaclewest.com</a> .
% Change Retail Sales (KWH)	+4.4	+2.8	+7.4	
Total Ret'l. Revs. per KWH (¢)	12.50	13.83	14.53	
Avg. Indust. Revs. per KWH (¢)	9.20	10.38	10.18	
Capacity at Peak (MW)	8612	9629	9466	
Peak Load, Summer (MW)	7587	8162	8210	
Annual Load Factor (%)	48.1	45.7	47.5	
% Change Customers (yr-end)	+2.1	+1.8	+2.1	

Fixed Charge Cov. (%)	258	220	238	<b>Leadership at Pinnacle West Capital expects the company's overheated bottom line to cool off some this year.</b> In 2024, the utility benefited from a record-setting heat wave in Arizona that helped send retail sales volume up 7.4% versus the prior-year level, as customers	<b>Earnings will likely be back on a growth trajectory starting in 2026.</b> Besides the higher-than-typical electricity volumes in 2024, which make for a difficult bottom-line comparison this year, the company is also suffering from regulatory lag. The utility plans to file its next rate
<b>ANNUAL RATES</b>	<b>Past</b>	<b>Past</b>	<b>Est'd '22-'24</b>		
of change (per sh)	<b>10 Yrs.</b>	<b>5 Yrs.</b>	<b>to '28-'30</b>		
Revenues	3.0%	5.0%	4.0%		
"Cash Flow"	4.0%	3.5%	5.0%		
Earnings	2.5%	-	5.0%		
Dividends	4.0%	4.0%	1.5%		
Book Value	4.0%	3.5%	4.0%		

Calendar	QUARTERLY REVENUES (\$ mill.)				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	783.5	1061.7	1469.9	1009.3	4324.4
2023	945.0	1121.7	1637.8	991.5	4696.0
2024	951.7	1309.0	1768.8	1095.4	5124.9
2025	990	1330	1740	1120	5180
2026	1030	1420	1855	1195	5500

Calendar	EARNINGS PER SHARE <sup>A</sup>				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	.15	1.45	2.88	d.21	4.26
2023	d.03	.94	3.50	Nil	4.41
2024	.15	1.76	3.37	d.06	5.24
2025	.10	1.60	3.15	d.05	4.80
2026	.15	1.70	3.35	d.05	5.15

Calendar	QUARTERLY DIVIDENDS PAID ■				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2021	.83	.83	.83	.85	3.34
2022	.85	.85	.85	.865	3.42
2023	.865	.865	.865	.88	3.48
2024	.88	.88	.88	.895	3.54
2025	.895				

<p><b>(A)</b> Diluted EPS. Excl. nonrec. gain/(loss): '09, \$1.45; '17, 8c; gains/(losses) from discount. Iss.: '09, (13c); '10, 18c; '11, 10c; '12, (5c). Divid. EPS may not sum to full year due to rounding.</p>	<p>Next eggs. report due May 1st. <b>(B)</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>B++</b> <b>95</b> <b>30</b> <b>85</b></p>
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PPL CORPORATION					NYSE-PPL		RECENT PRICE	33.51	P/E RATIO	19.0	(Trailing: 19.3 Median: 15.0)	RELATIVE P/E RATIO	1.04	DIV'D YLD	3.1%	VALUE LINE													
TIMELINESS	5	Lowered 1/3/25	High: 38.1	36.7	39.9	40.2	32.5	36.3	36.8	30.7	31.0	31.7	35.2	33.8			Target Price Range												
SAFETY	2	Raised 8/9/24	Low: 29.4	29.2	32.1	30.7	25.3	27.8	18.1	26.2	23.5	22.2	25.3	31.2			2028 2029 2030												
TECHNICAL	2	Raised 2/7/25	<b>LEGENDS</b> — 25.00 x Dividends p sh ... Relative Price Strength Options: Yes Shaded area indicates recession																										
BETA	1.10	(1.00 = Market)																											
18-Month Target Price Range																													
Low-High Midpoint (% to Mid)																													
\$24-\$38 \$31 (-5%)																													
2028-30 PROJECTIONS																													
High Price Gain Ann'l Total Low 35 (+35%) 10% 4%																													
Institutional Decisions																													
1Q2024 2Q2024 3Q2024																													
to Buy 325 327 426																													
to Sell 382 359 323																													
Hld's(000) 547034 567935 626757																													
Percent shares traded																													
2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023 2024 2025 2026																													
20.03 17.63 22.02 21.11 18.82 17.27 11.38 11.06 10.74 10.81 10.13 9.89 7.87 10.73 11.28 11.40 11.25 11.95 13.30																													
3.47 3.66 4.59 4.84 4.64 4.58 3.78 4.28 3.68 4.16 3.94 3.81 2.07 3.44 3.55 3.70 3.80 3.80 4.25																													
1.19 2.29 2.61 2.61 2.38 2.38 2.37 2.79 2.11 2.58 2.37 2.04 .53 1.41 1.60 1.70 1.85 1.95 2.40																													
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14.57 16.98 18.72 18.01 19.78 20.47 14.72 14.56 15.52 16.18 16.93 17.39 18.67 18.89 19.85 20.55 21.20 21.20 23.45																													
377.18 483.39 578.41 581.94 630.32 665.85 673.86 679.73 693.40 720.32 767.23 768.91 735.11 736.49 737.13 737.20 737.40 737.50 738.00																													
25.7 11.9 10.5 10.9 12.8 14.1 13.9 12.8 17.6 11.3 13.3 13.9 54.1 20.0 16.8 17.4 17.4 17.4 17.0																													
1.71 .76 .66 .69 .72 .74 .70 .67 .89 .61 .71 .71 2.92 1.16 .93 .97 .97 .95																													
4.5% 5.1% 5.1% 5.1% 4.8% 4.4% 4.5% 4.2% 4.2% 5.6% 5.2% 5.8% 3.1% 3.5% 3.1% 3.1% 3.1% 3.1% 3.4%																													
CAPITAL STRUCTURE as of 9/30/24																													
Total Debt \$16500 mill. Due in 5 Yrs \$3613 mill.																													
LT Debt \$16499 mill. LT Interest \$427 mill.																													
Incl. 23 mill. units 7.75%, \$25 liq. value; 82,000 units 8.23%, \$1000 face value.																													
(LT interest earned: 3.5x)																													
Leases, Uncapitalized Annual rentals \$24 mill.																													
Pension Assets-12/23 \$3175 mill.																													
Oblig \$3333 mill.																													
Pfd Stock None																													
Common Stock 737,970,005 shs.																													
as of 10/28/24																													
MARKET CAP: \$24.7 billion (Large Cap)																													
ELECTRIC OPERATING STATISTICS																													
2021 2022 2023																													
% Change Retail Sales (KWH)																													
Avg. Indust. Use (MWH)																													
Avg. Indust. Revs. per KWH (¢)																													
Capacity at Peak (Mw)																													
Peak Load, Winter (Mw)																													
Annual Load Factor (%)																													
% Change Customers (yr-end)																													
Fixed Charge Cov. (%)																													
ANNUAL RATES																													
of change (per sh)																													
Past 10 Yrs. Past 5 Yrs. Est'd '21-'23																													
Revenues -7.5% -3.0% 5.0%																													
"Cash Flow" -6.0% -8.5% 3.0%																													
Earnings -9.0% -17.0% 7.5%																													
Dividends -1.0% -4.5% -5.5%																													
Book Value -- 4.0% 3.0%																													
Cal-endar																													
QUARTERLY REVENUES (\$ mill.)																													
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																													
2022 1782 1696 2134 2290 7902																													
2023 2415 1823 2043 2031 8312																													
2024 2304 1881 2066 2149 8400																													
2025 1850 1800 2200 2450 8300																													
2026 2000 1900 2400 2500 8800																													
Cal-endar																													
EARNINGS PER SHARE A																													
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																													
2022 .41 .30 .41 .28 1.41																													
2023 .48 .29 .43 .40 1.60																													
2024 .54 .38 .42 .36 1.70																													
2025 .50 .40 .50 .45 1.85																													
2026 .50 .45 .50 .50 1.95																													
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QUARTERLY DIVIDENDS PAID B																													
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																													
2021 .415 .415 .415 .415 1.66																													
2022 .415 .20 .225 .225 1.07																													
2023 .225 .24 .24 .24 .95																													
2024 .24 .258 .258 .258 1.03																													
2025																													

**BUSINESS:** PPL Corporation (formerly PP&L Resources, Inc.) is a holding company for PPL Electric Utilities, which distributes electricity to 1.4 mill. customers in eastern & central Pennsylvania. Acquired Kentucky Utilities and Louisville Gas and Electric (1.3 mill. customers) 11/10. Acq'd Narragansett Electric (770,000 customers, renamed Rhode Island Energy) 5/22. Spun off power-generating sub. in '15. Sold electric distribution sub. in U.K. in '21. Electric rev. breakdown: res'l, 48%; comm'l, 22%; ind'l, 10%; other, 20%. Fuel costs: 29% of revs. '23 reported deprec. rate: 3.2%. Has 6,527 employees. Chairman: William H. Spence. President & CEO: Vincent Sorgi. Inc.: PA. Address: Two North Ninth St., Allentown, PA 18101-1179. Tel.: 800-345-3085. Internet: www.pplweb.com.

**We look for PPL Corporation to post solid 2025 results.** The company closed out the 2024 September period on a strong note with better-than-expected financial results, and reaffirmed its long-term annual earnings and dividend growth target of 6%-8% through at least 2027. Our estimate calls for profits of \$1.85 per share, representing 7% growth. PPL's bottom line should benefit nicely from lower operating and maintenance expenses through this year and beyond. Meanwhile, we think the top line will stay relatively flat due to regulatory uncertainty and operational factors, as well as limited open rate cases this year.

**Our 2026 top- and bottom-line estimates call for sharper growth.** We expect the utility to record profits of \$1.95 per share and revenues of \$8.8 billion, implying growth upwards of 7% and 6%, respectively. PPL looks for average annual rate base growth of 5.6% through decades end, with over 7% growth in the later years of the plan, driven by \$14.3 billion in capital investment. And, the utility is set to take advantage of elevated power demand over the next few years. Indeed,

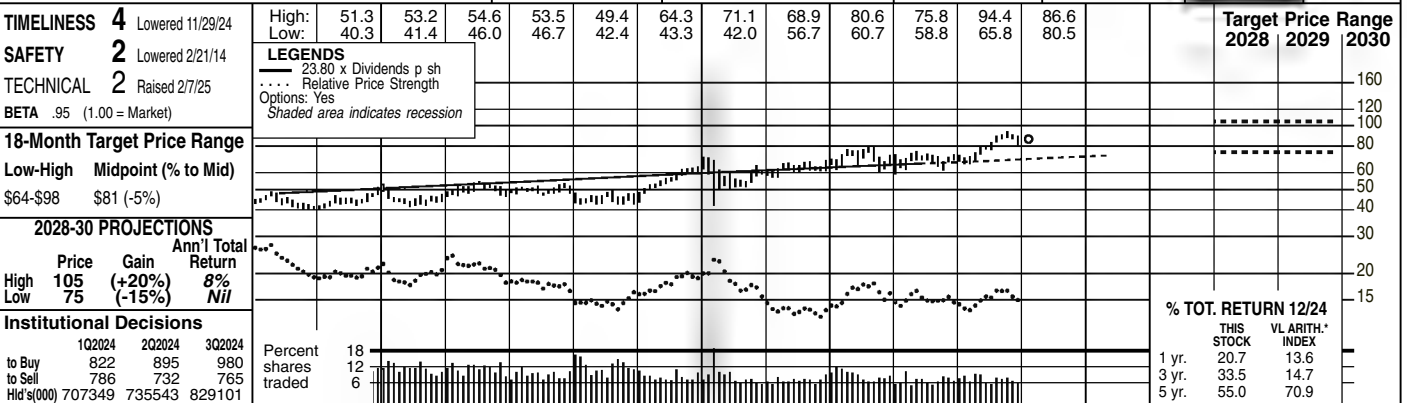
PPL's Louisville Gas and Electric utility subsidiary recently signed a power supply agreement with real estate developers PowerHouse Data Centers and Poe Companies on a 400 MW data center campus in Louisville. We look for more of these types of deals in the coming years as the utility is increasingly well positioned to benefit from the growing demand for data centers and electricity.

**These shares have risen slightly in value since our early November report.** But they are now up about 30% over the past year. At the recent quotation, long-term capital appreciation potential is very limited. Indeed, we think the stock will trade around \$35-\$45 by 2028-2030, indicating unattractive price upside.

**This issue is best suited for conservative, income-oriented accounts.** It has a solid dividend yield of 3.1%, and is ranked Above Average (2) for Safety. So, investors seeking utility exposure should take a closer look here. Meanwhile, the equity holds a 5 (Lowest) rank for Timeliness, making them a weak selection for the year ahead.

*Zachary J. Hodgkinson February 7, 2025*

<b>SOUTHERN COMPANY</b> NYSE-SO	RECENT PRICE	<b>86.50</b>	P/E RATIO	<b>20.6</b> (Trailing: 20.6) Median: 17.0	RELATIVE P/E RATIO	<b>1.13</b>	DIV'D YLD	<b>3.4%</b>	<b>VALUE LINE</b>
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2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	© VALUE LINE PUB. LLC	28-30	
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	Revenues per sh	28.30	
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	"Cash Flow" per sh	9.70	
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	Earnings per sh <sup>A</sup>	5.50	
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	Div'd Decl'd per sh <sup>B</sup> ■	3.10	
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	Cap'l Spending per sh	8.50	
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	Book Value per sh <sup>C</sup>	32.25	
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	Common Shs Outst'g <sup>D</sup>	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	Bold figures are Value Line estimates			Avg Ann'l P/E Ratio	16.5
.90	.95	.99	1.08	.91	.84	.80	.93	.78	.82	.94	.92	1.00	1.14	1.06	1.09				Relative P/E Ratio	.90
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%				Avg Ann'l Div'd Yield	3.6%

<b>CAPITAL STRUCTURE as of 9/30/24</b>	17489	19896	23031	23495	21419	20375	23113	29279	25253	<b>26450</b>	<b>27200</b>	<b>28250</b>	Revenues (\$mill)	<b>31000</b>
<b>Total Debt</b> \$62896 mill. <b>Due in 5 Yrs</b> \$15427 mill.	2647.0	2757.0	3269.0	3096.0	3354.0	3481.0	3670.0	3931.3	3976.0	<b>4435</b>	<b>4710</b>	<b>5035</b>	<b>Net Profit (\$mill)</b>	<b>6025</b>
<b>LT Debt</b> \$61254 mill. <b>LT Interest</b> \$1754 mill.	33.4%	28.5%	25.2%	21.3%	15.9%	14.3%	16.3%	18.9%	11.4%	<b>15.0%</b>	<b>15.0%</b>	<b>15.0%</b>	<b>Income Tax Rate</b>	<b>15.0%</b>
Incl. \$215 mill. finance leases.	13.2%	11.9%	7.6%	6.8%	6.0%	6.6%	7.7%	8.0%	7.9%	<b>8.0%</b>	<b>8.0%</b>	<b>8.0%</b>	<b>AFUDC % to Net Profit</b>	<b>6.0%</b>
(LT interest earned: 3.3x)	52.8%	61.5%	64.5%	62.0%	60.1%	61.5%	64.0%	63.0%	65.6%	<b>64.0%</b>	<b>64.0%</b>	<b>64.0%</b>	<b>Long-Term Debt Ratio</b>	<b>63.0%</b>
<b>Leases, Uncapitalized</b> Annual rentals \$307 mill.	44.0%	35.7%	35.0%	37.6%	39.5%	38.1%	35.6%	36.5%	37.6%	<b>36.0%</b>	<b>36.0%</b>	<b>36.0%</b>	<b>Common Equity Ratio</b>	<b>37.0%</b>
<b>Pension Assets-12/23</b> \$14218 mill.	46788	69359	68953	65750	69594	73336	78285	80558	83654	<b>85000</b>	<b>87500</b>	<b>90000</b>	<b>Total Capital (\$mill)</b>	<b>93500</b>
<b>Oblig</b> \$16382 mill.	61114	78446	79872	80797	83080	87634	91108	94570	99844	<b>100000</b>	<b>100500</b>	<b>100800</b>	<b>Net Plant (\$mill)</b>	<b>110000</b>
<b>Pfd Stock</b> \$242 mill. <b>Pfd Div'd</b> \$15 mill.	6.6%	4.9%	5.9%	5.9%	6.0%	5.9%	5.8%	5.5%	4.6%	<b>5.5%</b>	<b>5.5%</b>	<b>5.5%</b>	<b>Return on Total Cap'l</b>	<b>6.5%</b>
Incl. 10 mill. shs. 5.83% cum. pfd. (\$25 stated value); 475,115 shs. 4.2%-5.44% cum. pfd. (\$100 par).	12.0%	10.3%	13.3%	12.4%	12.1%	12.3%	13.0%	12.5%	12.6%	<b>13.0%</b>	<b>13.0%</b>	<b>13.0%</b>	<b>Return on Shr. Equity</b>	<b>14.5%</b>
<b>Common Stock</b> 1,095,684,180 shs.	12.6%	11.0%	13.4%	12.5%	12.1%	12.4%	13.1%	12.5%	12.6%	<b>13.0%</b>	<b>13.0%</b>	<b>13.0%</b>	<b>Return on Com Equity</b> <sup>E</sup>	<b>14.5%</b>
<b>MARKET CAP: \$94.8 billion (Large Cap)</b>	3.1%	2.5%	3.9%	2.6%	2.8%	2.8%	3.1%	3.0%	3.2%	<b>3.5%</b>	<b>3.5%</b>	<b>3.5%</b>	<b>Retained to Com Eq</b>	<b>5.0%</b>
<b>ELECTRIC OPERATING STATISTICS</b>	76%	78%	72%	79%	77%	78%	76%	78%	77%	<b>77%</b>	<b>77%</b>	<b>77%</b>	<b>All Div'ds to Net Prof</b>	<b>67%</b>

	2021	2022	2023	
% Change Retail Sales (KWH)	-5.3	+2.0	NA	<b>BUSINESS:</b> The Southern Company, through its subsidiaries, supplies electricity to 4.4 mill. customers in GA, AL, and MS. Also has a competitive generation business. Acq'd 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%.
Avg. Indust. Use (MWH)	NA	NA	NA	
Avg. Indust. Revs. per MWH (c)	NA	NA	NA	
Capacity at Yearend (Mw)	NA	NA	NA	
Peak Load, Summer (Mw)	NA	NA	NA	
Annual Load Factor (%)	NA	NA	NA	
% Change Customers (yr-end)	+1.3	+1.5	NA	
				Generating sources: gas, 51%; coal, 19%; nuclear, 10%; other, 11%; purchased, 9%. Fuel costs: 26% of revenues. '23 reported deprec. rates (utility): 2.7%-3.4%. Has 27,300 employees. President and CEO: Chris Womack. Incorporated: Delaware. Address: 30 Ivan Allen Jr. Blvd., N.W., Atlanta, Georgia 30308. Telephone: 404-506-0747. Internet: www.southerncompany.com.

Fixed Charge Cov. (%)	270	275	NA
<b>ANNUAL RATES</b>	<b>Past</b>	<b>Past</b>	<b>Est'd '21-'23</b>
of change (per sh)	<b>10 Yrs.</b>	<b>5 Yrs.</b>	<b>to '28-'30</b>
Revenues	--	5.0%	6.0%
"Cash Flow"	4.0%	4.5%	5.0%
Earnings	3.0%	3.0%	6.5%
Dividends	3.5%	3.5%	3.5%
Book Value	3.0%	2.5%	3.5%

**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

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

Calendar	QUARTERLY REVENUES (mill.)				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	6648	7206	8378	7047	29279
2023	6480	5748	6980	6045	25253
2024	6646	6463	7274	6067	26450
2025	7000	6500	7300	6400	27200
2026	7250	6700	7500	6800	28250

Calendar	EARNINGS PER SHARE <sup>A</sup>				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	.97	1.07	1.31	.26	3.61
2023	.79	.79	1.42	.64	3.64
2024	1.03	1.10	1.43	.49	4.05
2025	1.10	1.10	1.50	.60	4.30
2026	1.15	1.20	1.55	.70	4.60

Calendar	QUARTERLY DIVIDENDS PAID <sup>B</sup>				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2021	.64	.66	.66	.66	2.62
2022	.66	.68	.68	.68	2.70
2023	.68	.70	.70	.70	2.78
2024	.70	.72	.72	.72	2.86
2025					

<p><b>(A)</b> Diluted EPS. Excl. nonrec. gain (losses): '09, (25c); '13, (83c); '14, (59c); '15, (25c); '16, (28c); '17, (2.37c); '18, (78c); '19, \$1.30; '20, (17c); '21, (54c). Net earnings report due in May.</p> <p><b>(B)</b> Div'ds paid in early Mar., June, Sept., and Dec. ■ Div'd reinvestment plan avail.</p> <p><b>(C)</b> Incl. def'd charges. In '23: \$17.35/sh. (D) In mill. (E) Rate bases: AL, MS, fair value; FL, GA, orig. cost. Allowed return on common eq. (blended): 12.5%; earned on avg. com. eq., '21: 12.8%. Regulatory Climate: GA, AL Above Average; MS, FL Average.</p>	<p><b>Company's Financial Strength</b> A</p> <p><b>Stock's Price Stability</b> 90</p> <p><b>Price Growth Persistence</b> 65</p> <p><b>Earnings Predictability</b> 90</p>
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<b>XCEL ENERGY</b> NDQ-XEL	RECENT PRICE <b>67.06</b>	P/E RATIO <b>18.1</b> (Trailing: 19.2) Median: 20.0	RELATIVE P/E RATIO <b>1.15</b>	DIV'D YLD <b>3.5%</b>	<b>VALUE LINE</b>
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[illegible]

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	© VALUE LINE PUB. LLC	28-30
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	23.40	<b>25.85</b>	<b>27.35</b>	Revenues per sh	<b>31.95</b>
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	8.43	<b>9.10</b>	<b>9.75</b>	"Cash Flow" per sh	<b>11.70</b>
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	3.50	<b>3.80</b>	<b>4.05</b>	Earnings per sh <sup>A</sup>	<b>5.00</b>
.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	<b>2.28</b>	<b>2.42</b>	Div'd Decl'd per sh <sup>B</sup> + †	<b>3.00</b>
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	12.82	<b>15.00</b>	<b>14.00</b>	Cap'l Spending per sh	<b>13.00</b>
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	33.99	<b>35.80</b>	<b>37.70</b>	Book Value per sh <sup>C</sup>	<b>43.70</b>
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	574.37	<b>580.00</b>	<b>585.00</b>	Common Shs Outst'g <sup>D</sup>	<b>595.00</b>
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	17.0	<b>Bold figures are Value Line estimates</b>		Avg Ann'l P/E Ratio	<b>17.5</b>
.85	.90	.89	.94	.84	.81	.83	.97	1.02	1.02	1.19	1.23	1.22	1.28	1.06	.90			Relative P/E Ratio	<b>.95</b>
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	<b>3.4%</b>

<b>CAPITAL STRUCTURE as of 12/31/24</b>	11024	11107	11404	11537	11529	11526	13431	15310	14206	13441	15000	16000	Revenues (\$mill)	19000
<b>Total Debt</b> \$29114 mill. <b>Due in 5 Yrs</b> \$3741 mill.	1063.6	1123.4	1171.0	1261.0	1372.0	1473.0	1597.0	1736.0	1851.0	1969.0	2205	2360	<b>Net Profit</b> (\$mill)	2975
<b>LT Debt</b> \$27316 mill. <b>LT Interest</b> \$1182 mill.	35.8%	34.1%	30.7%	12.6%	8.5%	--	--	--	--	--	<b>NMF</b>	<b>NMF</b>	<b>Income Tax Rate</b>	<b>NMF</b>
Incl. \$228 mill. finance leases.	7.7%	7.8%	9.4%	12.4%	8.3%	10.7%	6.2%	5.9%	7.7%	12.2%	10.0%	10.0%	<b>AFUDC % to Net Profit</b>	9.0%
(Total Interest Coverage: 2.6x)	54.1%	56.3%	55.9%	56.4%	56.8%	57.4%	58.2%	57.8%	58.6%	58.3%	61.0%	61.5%	<b>Long-Term Debt Ratio</b>	61.0%
<b>Leases, Uncapitalized</b> Annual rentals \$277 mill.	45.9%	43.7%	44.1%	43.6%	43.2%	42.6%	41.8%	42.2%	41.4%	41.7%	39.0%	38.5%	<b>Common Equity Ratio</b>	39.0%
<b>Pension Assets-12/24</b> \$2504 mill.	23092	25216	25975	28025	30646	34220	37391	39488	42529	46838	53000	57500	<b>Total Capital (\$mill)</b>	66500
<b>Oblig.</b> \$2752 mill.	31206	32842	34329	36944	39483	42950	45457	48253	51642	57198	63400	68000	<b>Net Plant (\$mill)</b>	77800
<b>Pfd Stock</b> None	5.8%	5.7%	5.8%	5.7%	5.6%	5.4%	5.3%	5.5%	5.4%	5.5%	5.5%	5.5%	<b>Return on Total Cap'l</b>	5.5%
<b>Common Stock</b> 574,365,598 shs.	10.0%	10.2%	10.2%	10.3%	10.4%	10.1%	10.2%	10.4%	10.5%	10.1%	10.5%	10.5%	<b>Return on Shr. Equity</b>	11.0%
	10.0%	10.2%	10.2%	10.3%	10.4%	10.1%	10.2%	10.4%	10.5%	10.1%	10.5%	10.5%	<b>Return on Com Equity</b> <sup>E</sup>	11.0%
<b>MARKET CAP: \$38.5 billion (Large Cap)</b>	4.3%	4.0%	3.9%	4.3%	4.4%	4.2%	4.2%	4.3%	4.3%	4.1%	4.5%	4.5%	<b>Retained to Com Eq</b>	4.5%
<b>ELECTRIC OPERATING STATISTICS</b>	57%	61%	62%	58%	58%	58%	59%	58%	59%	60%	60%	60%	<b>All Div'ds to Net Prof</b>	60%

	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>BUSINESS:</b> Xcel Energy Inc. is the parent of: Northern States Power Company (NSP), which supplies electricity to MN, WI, ND, SD & MI & gas to MN, WI, ND & MI; Public Service Company of Colorado (PSCO), which supplies electricity & gas to CO; & Southwestern Public Service Company (SPS), which supplies electricity to TX and NM. Customers: 3.9 mill. electric, 2.2 mill. gas. Electric	revenues: resid'l, 32%; comm'l & ind'l, 49%; other, 19%. Purchases 35% of power, owns 65%. Total electric mix: wind, 33%; gas, 33%; coal, 15%, nuclear, 10%, solar/other, 9%. Fuel cost: 35% of revenues. 2% deprec. rate: 3.8%. Employs 11,380. Chrmn., President, and CEO: Robert Frenzel. E-mail: <a href="mailto:414.Nicollet.Mn.Minneapolis.MN.55401">414.Nicollet.Mn.Minneapolis.MN.55401</a> . Tel.: 612-330-5500. Int.: <a href="http://www.xcelenergy.com">www.xcelenergy.com</a> .
% Change Retail Sales (KWH)	+1.2	-1.6	-2.4		
Resid'l Revs. per KWH (c)	13.41	13.80	13.83		
C & I Revs. per KWH (c)	9.02	8.82	8.24		
Capacity at Peak (MW)	NA	NA	NA		
Peak Load, Summer (MW)	20346	20512	20343		
Annual Load Factor (%)	NA	NA	NA		
% Change Customers (yr-end)	+1.0	+1.1	+1.2		

Fixed Charge Cov. (%)				255	245	194
<b>ANNUAL RATES</b>	<b>Past</b>	<b>Past</b>	<b>Est'd '22-'24</b>	<b>Xcel Energy has a track record that few in the electric utility peer group can match.</b> The company has managed to string together 19 consecutive years of rising earnings. The last time Xcel's bottom line failed to eclipse the prior year's tally was 2005. The company has made a habit		
of change (per sh)	10 Yrs.	5 Yrs.	to '28-'30			
Revenues	1.5%	3.0%	3.5%			
"Cash Flow"	7.0%	6.5%	6.5%			
Earnings	5.5%	6.0%	7.0%			
Dividends	6.5%	6.5%	6.5%			
Book Value	5.5%	6.0%	5.5%	<b>The company has plenty of investment opportunities.</b> Leadership believes its five-year capital expenditure plan (base case) will deliver annual rate-base growth in excess of 9%, which should translate to 6%-8% share-earnings gains. Regular readers of our utility reports likely know		

Calendar	QUARTERLY REVENUES (\$ mill.)				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	3751	3424	4082	4053	15310
2023	4080	3022	3662	3442	14206
2024	3649	3028	3644	3120	13441
2025	<u>3900</u>	<u>3300</u>	<u>3975</u>	<u>3825</u>	<u>15000</u>
2026	<u>4125</u>	<u>3600</u>	<u>4225</u>	<u>4050</u>	<u>16000</u>

Calendar	EARNINGS PER SHARE <sup>A</sup>				Full Year
	Mar.31	Jun.30	Sep.30	Dec.31	
2022	.70	.60	1.18	.69	3.17
2023	.76	.52	1.23	.83	3.35
2024	.89	.55	1.25	.81	3.50
2025	.90	.65	1.35	.90	3.80
2026	.95	.70	1.45	.95	4.05

Calendar	QUARTERLY DIVIDENDS PAID $\text{\$}$				Full Year
	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	.57			

**Attachment AHG - 3**  
**25-EKCE-294-RTS**

**Internal Rate of Return Analysis Summary**  
**25-EKCE-294-RTS**

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Aver. IRR	ST Growth	LT Growth	2026 Dividends	2025 Year 0	2026 Year1	2027 Year2	2028 Year3	2029 Year4	2030 Year5	2031 Year6	Sum of 2030 through Year 7 through Year 250	
Alliant Energy Corporation	LNT	8.04%	6.36%	4.09%	\$ 2.16	\$ (59.15)	\$ 2.16	\$ 2.30	\$ 2.44	\$ 2.60	\$ 2.76	\$ 2.88	\$ 1,295,493.72	
Ameren Corporation	AEE	7.71%	6.73%	4.09%	3.03	(91.66)	3.03	3.23	3.45	3.68	3.93	4.09	1,842,364.38	
American Electric Power Company, Inc.	AEP	8.55%	6.31%	4.09%	3.98	(96.22)	3.98	4.23	4.50	4.78	5.08	5.29	2,382,357.52	
Avista Corporation	AVA	10.06%	5.48%	4.09%	2.10	(36.85)	2.10	2.22	2.34	2.46	2.60	2.71	1,218,223.16	
CMS Energy Corporation	CMS	7.78%	6.54%	4.09%	2.30	(67.91)	2.30	2.45	2.61	2.78	2.96	3.08	1,388,692.49	
DTE Energy Company	DTE	8.12%	5.66%	4.09%	4.71	(123.28)	4.71	4.98	5.26	5.56	5.87	6.11	2,751,259.64	
Duke Energy Corporation	DUK	8.17%	5.55%	4.09%	4.30	(110.94)	4.30	4.54	4.79	5.06	5.34	5.56	2,501,559.27	
Entergy Corporation	ETR	7.82%	6.77%	4.09%	2.55	(75.07)	2.55	2.72	2.91	3.10	3.31	3.45	1,553,121.37	
IDACORP, Inc.	IDA	7.88%	7.06%	4.09%	3.65	(106.82)	3.65	3.91	4.18	4.48	4.79	4.99	2,247,136.74	
NextEra Energy, Inc.	NEE	8.33%	8.36%	4.09%	2.50	(68.31)	2.50	2.71	2.94	3.18	3.45	3.59	1,615,117.34	
NorthWestern Corporation	NWE	9.30%	4.68%	4.09%	2.68	(52.48)	2.68	2.81	2.94	3.07	3.22	3.35	1,508,196.38	
OGE Energy Corporation	OGE	8.50%	5.59%	4.09%	1.73	(41.28)	1.73	1.83	1.93	2.04	2.15	2.24	1,007,776.85	
Pinnacle West Capital Corporation	PNW	8.28%	3.36%	4.09%	3.67	(85.32)	3.67	3.79	3.92	4.05	4.19	4.36	1,963,298.47	
Portland General Electric Company	POR	10.41%	5.07%	4.09%	2.21	(36.15)	2.21	2.32	2.44	2.56	2.69	2.80	1,262,097.13	
PPL Corporation	PPL	8.07%	7.22%	4.09%	1.17	(32.77)	1.17	1.25	1.34	1.44	1.55	1.61	724,563.26	
Southern Company	SO	7.93%	5.70%	4.09%	3.05	(84.01)	3.05	3.22	3.41	3.60	3.81	3.96	1,784,469.46	
Xcel Energy Inc.	XEL	8.20%	7.22%	4.09%	2.42	(65.56)	2.42	2.59	2.78	2.98	3.20	3.33	1,498,669.30	
	Mean	8.42%												
	Median	8.17%												
	Mean	8.42%												
	Min	7.71%												
	Max	10.41%												

- Column 1) Proxy group  
2) Internal rate of return calculation which is the discount rate that equates the stock price paid to the stream of future dividends recieved  
3) Mean of observed weekly high and low stock prices from November 1, 2024 through April 29, 2025  
4) Average of short-term growth rates used in first 5 years  
5) Long-term nGDP growth rate used beginning in year 6  
6) 2026 dividends reported by Value-Line  
7) Year 0 Cashflow; stock price less 2026 dividend  
8 through 12 ) Annual cashflow growing at short-term growth rate  
13 through 250 ) Annual cashflow growing at long-term growth rate



Alliant Energy Corp. LNT			Ameren Corp. AEE			Am. Electr. Pwr. Co., Inc. AEP			Avista Corp. AVA			Schedule AHG - 2 25-EKCE-294-RTS
6 Month	High	Low	6 Month	High	Low	6 Month	High	Low	6 Month	High	Low	
Range			Range			Range			Range			
Mean			Mean			Mean			Mean			
Median			Median			Median			Median			
	\$66.54	\$56.08		\$104.10	\$85.27		\$110.48	\$89.91		\$43.09	\$34.80	
	\$61.44	\$60.28		\$95.43	\$93.61		\$100.95	\$98.97		\$38.63	\$37.87	
	\$61.14	\$60.24		\$93.57	\$93.57		\$100.44	\$98.31		\$38.01	\$37.44	
3 Month			3 Month			3 Month			3 Month			
Range			Range			Range			Range			
Mean			Mean			Mean			Mean			
Median			Median			Median			Median			
	\$66.54	\$57.09		\$104.10	\$91.77		\$110.48	\$97.32		\$43.09	\$36.28	
	\$62.64	\$61.35		\$99.43	\$97.36		\$105.68	\$103.44		\$39.93	\$39.11	
	\$62.89	\$61.50		\$99.42	\$97.53		\$106.40	\$104.04		\$40.05	\$39.26	
4/29/2025	\$61.80	\$60.48	4/29/2025	\$99.52	\$98.27	4/29/2025	\$108.58	\$106.29	4/29/2025	\$41.84	\$41.17	
4/28/2025	\$61.04	\$60.14	4/28/2025	\$99.42	\$97.95	4/28/2025	\$107.56	\$105.70	4/28/2025	\$41.55	\$40.74	
4/25/2025	\$61.43	\$60.35	4/25/2025	\$99.00	\$97.76	4/25/2025	\$106.88	\$105.58	4/25/2025	\$41.37	\$40.60	
4/24/2025	\$61.72	\$60.87	4/24/2025	\$99.58	\$97.92	4/24/2025	\$107.63	\$105.70	4/24/2025	\$41.57	\$41.24	
4/23/2025	\$61.49	\$60.30	4/23/2025	\$99.67	\$97.69	4/23/2025	\$108.13	\$105.57	4/23/2025	\$41.83	\$41.12	
4/22/2025	\$61.07	\$59.31	4/22/2025	\$99.42	\$96.56	4/22/2025	\$108.31	\$106.13	4/22/2025	\$41.88	\$41.27	
4/21/2025	\$60.92	\$58.67	4/21/2025	\$98.24	\$95.27	4/21/2025	\$107.77	\$104.72	4/21/2025	\$41.94	\$40.95	
4/17/2025	\$60.77	\$60.29	4/17/2025	\$99.82	\$98.08	4/17/2025	\$109.03	\$106.67	4/17/2025	\$42.45	\$41.49	
4/16/2025	\$61.93	\$60.28	4/16/2025	\$99.63	\$97.56	4/16/2025	\$107.46	\$105.65	4/16/2025	\$42.30	\$41.55	
4/15/2025	\$62.38	\$61.51	4/15/2025	\$100.08	\$98.87	4/15/2025	\$107.51	\$106.21	4/15/2025	\$41.92	\$41.00	
4/14/2025	\$62.21	\$60.55	4/14/2025	\$99.35	\$97.14	4/14/2025	\$106.94	\$103.73	4/14/2025	\$41.33	\$40.53	
4/11/2025	\$60.90	\$59.29	4/11/2025	\$98.29	\$95.28	4/11/2025	\$105.17	\$101.86	4/11/2025	\$40.77	\$39.78	
4/10/2025	\$61.14	\$59.04	4/10/2025	\$98.34	\$94.75	4/10/2025	\$104.31	\$101.52	4/10/2025	\$40.64	\$39.24	
4/9/2025	\$60.57	\$57.09	4/9/2025	\$97.61	\$91.77	4/9/2025	\$103.82	\$98.35	4/9/2025	\$40.94	\$38.27	
4/8/2025	\$61.11	\$58.20	4/8/2025	\$97.30	\$93.33	4/8/2025	\$103.98	\$100.56	4/8/2025	\$40.53	\$39.07	
4/7/2025	\$61.51	\$58.80	4/7/2025	\$96.67	\$92.50	4/7/2025	\$104.79	\$100.67	4/7/2025	\$40.60	\$38.51	
4/4/2025	\$65.17	\$60.91	4/4/2025	\$102.54	\$95.05	4/4/2025	\$110.48	\$103.92	4/4/2025	\$42.59	\$40.53	
4/3/2025	\$65.72	\$64.51	4/3/2025	\$102.94	\$100.90	4/3/2025	\$110.46	\$107.75	4/3/2025	\$43.09	\$42.13	
4/2/2025	\$64.90	\$63.94	4/2/2025	\$101.63	\$100.07	4/2/2025	\$108.80	\$107.27	4/2/2025	\$42.52	\$42.03	
4/1/2025	\$64.56	\$63.86	4/1/2025	\$99.59	\$97.59	4/1/2025	\$108.88	\$107.52	4/1/2025	\$42.46	\$41.41	
3/31/2025	\$63.63	\$63.63	3/31/2025	\$101.86	\$99.82	3/31/2025	\$109.67	\$107.84	3/31/2025	\$41.98	\$41.01	
3/28/2025	\$64.07	\$63.29	3/28/2025	\$100.08	\$99.17	3/28/2025	\$107.41	\$105.37	3/28/2025	\$41.01	\$40.00	
3/27/2025	\$63.51	\$62.79	3/27/2025	\$99.38	\$98.44	3/27/2025	\$105.60	\$103.78	3/27/2025	\$40.18	\$39.96	
3/26/2025	\$63.28	\$62.14	3/26/2025	\$99.26	\$96.98	3/26/2025	\$104.31	\$102.57	3/26/2025	\$40.04	\$39.77	
3/25/2025	\$62.90	\$61.73	3/25/2025	\$98.94	\$96.59	3/25/2025	\$103.00	\$101.96	3/25/2025	\$39.75	\$39.01	
3/24/2025	\$63.61	\$62.92	3/24/2025	\$99.94	\$98.65	3/24/2025	\$105.69	\$104.03	3/24/2025	\$40.06	\$39.60	
3/21/2025	\$63.91	\$62.58	3/21/2025	\$99.82	\$98.15	3/21/2025	\$106.65	\$104.40	3/21/2025	\$40.20	\$39.43	
3/20/2025	\$63.72	\$63.20	3/20/2025	\$100.47	\$99.48	3/20/2025	\$106.59	\$105.55	3/20/2025	\$40.02	\$39.54	
3/19/2025	\$63.68	\$62.93	3/19/2025	\$100.46	\$99.08	3/19/2025	\$106.30	\$105.14	3/19/2025	\$39.72	\$39.24	
3/18/2025	\$63.50	\$62.84	3/18/2025	\$100.64	\$99.04	3/18/2025	\$106.49	\$105.38	3/18/2025	\$39.92	\$39.38	
3/17/2025	\$64.20	\$62.92	3/17/2025	\$100.88	\$99.04	3/17/2025	\$106.83	\$105.13	3/17/2025	\$40.17	\$39.76	
3/14/2025	\$63.02	\$61.88	3/14/2025	\$99.62	\$97.44	3/14/2025	\$105.95	\$103.59	3/14/2025	\$40.01	\$39.99	
3/13/2025	\$62.92	\$61.88	3/13/2025	\$98.57	\$97.35	3/13/2025	\$104.29	\$102.70	3/13/2025	\$39.59	\$38.87	
3/12/2025	\$62.88	\$62.07	3/12/2025	\$98.23	\$97.09	3/12/2025	\$103.79	\$102.35	3/12/2025	\$39.50	\$38.77	
3/11/2025	\$63.81	\$62.47	3/11/2025	\$99.30	\$97.54	3/11/2025	\$107.99	\$104.39	3/11/2025	\$39.92	\$38.90	
3/10/2025	\$64.28	\$62.51	3/10/2025	\$100.71	\$98.24	3/10/2025	\$108.67	\$104.91	3/10/2025	\$40.23	\$39.45	
3/7/2025	\$62.98	\$62.00	3/7/2025	\$99.38	\$96.97	3/7/2025	\$104.88	\$102.68	3/7/2025	\$40.00	\$39.02	
3/6/2025	\$63.21	\$62.08	3/6/2025	\$98.48	\$96.59	3/6/2025	\$103.31	\$101.42	3/6/2025	\$39.54	\$38.69	
3/5/2025	\$64.57	\$63.27	3/5/2025	\$100.15	\$98.40	3/5/2025	\$105.46	\$103.19	3/5/2025	\$39.97	\$39.28	
3/4/2025	\$66.54	\$64.21	3/4/2025	\$104.10	\$99.87	3/4/2025	\$109.52	\$105.14	3/4/2025	\$40.11	\$39.70	
3/3/2025	\$66.15	\$64.49	3/3/2025	\$103.87	\$100.98	3/3/2025	\$107.82	\$105.69	3/3/2025	\$40.04	\$39.70	
2/28/2025	\$64.76	\$63.77	2/28/2025	\$101.75	\$99.87	2/28/2025	\$107.11	\$104.66	2/28/2025	\$40.21	\$39.58	
2/27/2025	\$64.35	\$63.31	2/27/2025	\$100.08	\$98.28	2/27/2025	\$106.78	\$104.80	2/27/2025	\$40.02	\$38.50	
2/26/2025	\$64.05	\$63.30	2/26/2025	\$99.72	\$98.73	2/26/2025	\$107.51	\$106.37	2/26/2025	\$40.17	\$38.65	
2/25/2025	\$64.15	\$63.40	2/25/2025	\$99.71	\$98.46	2/25/2025	\$107.84	\$105.97	2/25/2025	\$38.86	\$38.24	
2/24/2025	\$62.60	\$62.60	2/24/2025	\$99.78	\$97.92	2/24/2025	\$107.39	\$105.21	2/24/2025	\$38.57	\$37.74	
2/21/2025	\$63.30	\$61.32	2/21/2025	\$98.73	\$96.68	2/21/2025	\$105.73	\$104.06	2/21/2025	\$38.14	\$37.56	
2/20/2025	\$61.90	\$61.12	2/20/2025	\$97.82	\$96.59	2/20/2025	\$104.65	\$102.20	2/20/2025	\$37.69	\$37.00	
2/19/2025	\$61.94	\$61.48	2/19/2025	\$98.66	\$97.25	2/19/2025	\$103.16	\$101.72	2/19/2025	\$37.60	\$36.91	
2/18/2025	\$62.04	\$61.02	2/18/2025	\$98.51	\$97.52	2/18/2025	\$103.24	\$101.00	2/18/2025	\$37.15	\$36.59	
2/14/2025	\$62.08	\$61.12	2/14/2025	\$100.62	\$97.40	2/14/2025	\$102.92	\$100.84	2/14/2025	\$37.64	\$36.74	
2/13/2025	\$61.45	\$60.50	2/13/2025	\$98.69	\$97.39	2/13/2025	\$102.57	\$100.32	2/13/2025	\$37.44	\$37.05	
2/12/2025	\$60.73	\$59.44	2/12/2025	\$98.33	\$96.62	2/12/2025	\$102.52	\$100.60	2/12/2025	\$37.21	\$36.56	
2/11/2025	\$60.36	\$59.21	2/11/2025	\$98.25	\$96.50	2/11/2025	\$102.11	\$99.47	2/11/2025	\$37.33	\$36.55	
2/10/2025	\$59.98	\$59.07	2/10/2025	\$97.99	\$96.37	2/10/2025	\$100.96	\$99.11	2/10/2025	\$36.86	\$36.32	
2/7/2025	\$59.68	\$59.12	2/7/2025	\$97.37	\$96.06	2/7/2025	\$100.44	\$99.41	2/7/2025	\$36.75	\$36.41	
2/6/2025	\$60.03	\$59.22	2/6/2025	\$96.97	\$95.62	2/6/2025	\$100.67	\$98.87	2/6/2025	\$37.11	\$36.49	
2/5/2025	\$59.17	\$59.17	2/5/2025	\$97.29	\$96.03	2/5/2025	\$99.89	\$98.40	2/5/2025	\$37.30	\$36.73	
2/4/2025	\$59.52	\$58.36	2/4/2025	\$95.58	\$94.10	2/4/2025	\$99.07	\$97.80	2/4/2025	\$36.83	\$36.28	
2/3/2025	\$59.38	\$58.10	2/3/2025	\$96.23	\$93.16	2/3/2025	\$99.69	\$97.32	2/3/2025	\$36.91	\$36.28	
1/31/2025	\$59.25	\$58.64	1/31/2025	\$94.77	\$93.65	1/31/2025	\$99.05	\$97.52	1/31/2025	\$36.74	\$36.35	
1/30/2025	\$59.60	\$58.84	1/30/2025	\$94.22	\$93.23	1/30/2025	\$99.15	\$97.56	1/30/2025	\$36.68	\$36.21	
1/29/2025	\$59.36	\$58.56	1/29/2025	\$93.91	\$92.53	1/29/2025	\$100.73	\$97.36	1/29/2025	\$36.48	\$35.92	
1/28/2025	\$59.92	\$58.62	1/28/2025	\$94.33	\$92.45	1/28/2025	\$102.47	\$99.75	1/28/2025	\$36.86	\$36.10	
1/27/2025	\$60.03	\$58.31	1/27/2025	\$94.79	\$91.87	1/27/2025	\$103.05	\$98.16	1/27/2025	\$36.92	\$36.03	
1/24/2025	\$59.08	\$58.45	1/24/2025	\$94.25	\$92.79	1/24/2025	\$98.50	\$97.05	1/24/2025	\$36.08	\$35.48	
1/23/2025	\$59.21	\$58.55	1/23/2025	\$94.10	\$93.07	1/23/2025	\$99.50	\$97.38	1/23/2025	\$36.29	\$35.61	
1/22/2025	\$59.84	\$59.05	1/22/2025	\$96.03	\$93.11	1/22/2025	\$98.13	\$96.85	1/22/2025	\$37.42	\$36.19	
1/21/2025	\$61.93	\$60.77	1/21/2025	\$96.74	\$95.16	1/21/2025	\$98.73	\$97.60	1/21/2025	\$37.89	\$37.44	
1/17/2025	\$60.73	\$59.96	1/17/2025	\$94.93	\$93.31	1/17/2025	\$97.98	\$96.80	1/17/2025	\$37.43	\$36.73	
1/16/2025	\$60.11	\$58.30	1/16/2025	\$93.90	\$90.84	1/16/2025	\$96.85	\$94.70	1/16/2025	\$37.07	\$36.02	
1/15/2025	\$58.87	\$58.14	1/15/2025	\$91.50	\$90.26	1/15/2025	\$95.61	\$94.53	1/15/2025	\$36.51	\$35.90	
1/14/2025	\$57.86	\$56.81	1/14/2025	\$89.93	\$88.74	1/14/2025	\$94.54	\$93.43	1/14/2025	\$36.03	\$35.45	
1/13/2025	\$57.17	\$56.30	1/13/2025	\$88.95	\$87.55	1/13/2025	\$95.92	\$92.76	1/13/2025	\$35.45	\$34.80	
1/10/2025	\$57.93	\$5										

CMS Energy Corp. CMS			DTE Energy Co. DTE			Duke Energy Corp. DUK			Entergy Corp. ETR			Schedule AHG - 2 25-EKCE-294-RTS
6 Month	High	Low	6 Month	High	Low	6 Month	High	Low	6 Month	High	Low	
Range	\$76.45	\$63.97	Range	\$126.45	\$115.59	Range	\$125.27	\$105.20	Range	\$88.38	\$66.85	
Mean	\$70.27	\$68.96	Mean	\$127.58	\$125.14	Mean	\$115.15	\$113.10	Mean	\$80.67	\$78.75	
Median	\$69.68	\$68.27	Median	\$125.00	\$122.91	Median	\$115.27	\$113.00	Median	\$81.77	\$78.95	
3 Month			3 Month			3 Month			3 Month			
Range	\$76.45	\$65.17	Range	\$140.39	\$118.20	Range	\$125.27	\$110.51	Range	\$88.38	\$75.57	
Mean	\$72.69	\$71.18	Mean	\$133.11	\$130.35	Mean	\$118.69	\$116.32	Mean	\$84.53	\$82.39	
Median	\$73.36	\$71.91	Median	\$133.72	\$131.15	Median	\$118.54	\$116.23	Median	\$84.46	\$82.54	
4/29/2025	\$73.79	\$72.06	4/29/2025	\$137.75	\$134.75	4/29/2025	\$121.91	\$119.37	4/29/2025	\$84.84	\$82.36	
4/28/2025	\$72.67	\$71.81	4/28/2025	\$136.12	\$133.06	4/28/2025	\$120.88	\$119.18	4/28/2025	\$85.15	\$84.02	
4/25/2025	\$74.61	\$72.07	4/25/2025	\$136.79	\$134.32	4/25/2025	\$121.27	\$119.42	4/25/2025	\$85.20	\$84.19	
4/24/2025	\$75.50	\$73.46	4/24/2025	\$137.75	\$134.91	4/24/2025	\$121.52	\$120.17	4/24/2025	\$85.26	\$83.25	
4/23/2025	\$73.82	\$72.46	4/23/2025	\$136.76	\$134.04	4/23/2025	\$122.12	\$120.04	4/23/2025	\$85.11	\$83.32	
4/22/2025	\$73.83	\$72.47	4/22/2025	\$136.42	\$132.80	4/22/2025	\$122.89	\$120.50	4/22/2025	\$83.69	\$81.23	
4/21/2025	\$73.09	\$71.47	4/21/2025	\$133.28	\$130.19	4/21/2025	\$121.95	\$118.99	4/21/2025	\$82.75	\$79.48	
4/17/2025	\$73.96	\$72.27	4/17/2025	\$135.29	\$132.69	4/17/2025	\$123.55	\$120.50	4/17/2025	\$84.38	\$82.50	
4/16/2025	\$73.43	\$71.86	4/16/2025	\$134.25	\$131.48	4/16/2025	\$121.98	\$120.07	4/16/2025	\$83.74	\$81.92	
4/15/2025	\$73.98	\$72.68	4/15/2025	\$134.27	\$132.56	4/15/2025	\$121.75	\$120.34	4/15/2025	\$84.46	\$82.85	
4/14/2025	\$73.75	\$71.60	4/14/2025	\$133.96	\$129.94	4/14/2025	\$121.19	\$118.07	4/14/2025	\$83.38	\$82.08	
4/11/2025	\$72.29	\$69.70	4/11/2025	\$129.89	\$126.75	4/11/2025	\$119.33	\$115.52	4/11/2025	\$82.04	\$78.99	
4/10/2025	\$72.20	\$70.02	4/10/2025	\$130.90	\$126.71	4/10/2025	\$118.00	\$114.62	4/10/2025	\$81.36	\$78.46	
4/9/2025	\$71.94	\$68.15	4/9/2025	\$131.36	\$123.69	4/9/2025	\$117.84	\$112.07	4/9/2025	\$81.32	\$75.57	
4/8/2025	\$72.46	\$69.45	4/8/2025	\$131.21	\$125.72	4/8/2025	\$118.36	\$114.70	4/8/2025	\$81.77	\$78.07	
4/7/2025	\$72.91	\$70.50	4/7/2025	\$131.27	\$126.09	4/7/2025	\$120.32	\$115.71	4/7/2025	\$81.35	\$75.62	
4/4/2025	\$76.38	\$72.39	4/4/2025	\$140.32	\$130.64	4/4/2025	\$125.27	\$117.86	4/4/2025	\$85.02	\$78.51	
4/3/2025	\$76.45	\$74.67	4/3/2025	\$140.39	\$137.68	4/3/2025	\$124.67	\$121.63	4/3/2025	\$87.25	\$84.85	
4/2/2025	\$75.45	\$74.47	4/2/2025	\$138.94	\$136.55	4/2/2025	\$121.39	\$119.90	4/2/2025	\$86.94	\$85.02	
4/1/2025	\$75.30	\$74.31	4/1/2025	\$138.37	\$136.81	4/1/2025	\$122.04	\$120.59	4/1/2025	\$86.07	\$84.19	
3/31/2025	\$75.52	\$74.25	3/31/2025	\$139.05	\$136.63	3/31/2025	\$122.50	\$120.17	3/31/2025	\$85.65	\$84.16	
3/28/2025	\$74.73	\$73.02	3/28/2025	\$137.19	\$135.49	3/28/2025	\$119.96	\$117.64	3/28/2025	\$85.06	\$84.10	
3/27/2025	\$73.75	\$73.03	3/27/2025	\$136.39	\$134.95	3/27/2025	\$118.23	\$117.11	3/27/2025	\$84.83	\$83.44	
3/26/2025	\$73.52	\$72.05	3/26/2025	\$136.15	\$134.60	3/26/2025	\$117.33	\$116.08	3/26/2025	\$84.27	\$82.86	
3/25/2025	\$73.31	\$71.49	3/25/2025	\$136.48	\$133.00	3/25/2025	\$118.23	\$114.92	3/25/2025	\$84.09	\$82.42	
3/24/2025	\$74.13	\$73.09	3/24/2025	\$138.09	\$135.97	3/24/2025	\$119.81	\$118.01	3/24/2025	\$84.78	\$82.54	
3/21/2025	\$74.31	\$73.02	3/21/2025	\$138.22	\$135.54	3/21/2025	\$120.91	\$118.38	3/21/2025	\$84.40	\$83.39	
3/20/2025	\$73.90	\$73.20	3/20/2025	\$137.03	\$135.74	3/20/2025	\$120.26	\$119.11	3/20/2025	\$84.85	\$84.18	
3/19/2025	\$73.99	\$73.05	3/19/2025	\$136.76	\$134.87	3/19/2025	\$120.88	\$118.67	3/19/2025	\$84.96	\$83.12	
3/18/2025	\$73.63	\$72.70	3/18/2025	\$135.93	\$134.39	3/18/2025	\$121.07	\$119.69	3/18/2025	\$83.59	\$82.30	
3/17/2025	\$73.84	\$72.71	3/17/2025	\$136.31	\$133.33	3/17/2025	\$121.47	\$119.05	3/17/2025	\$86.42	\$84.56	
3/14/2025	\$72.89	\$71.51	3/14/2025	\$135.52	\$132.32	3/14/2025	\$120.40	\$117.54	3/14/2025	\$85.17	\$82.83	
3/13/2025	\$72.04	\$71.06	3/13/2025	\$133.01	\$130.93	3/13/2025	\$118.34	\$116.37	3/13/2025	\$83.23	\$81.75	
3/12/2025	\$72.02	\$70.94	3/12/2025	\$132.42	\$130.95	3/12/2025	\$117.30	\$115.65	3/12/2025	\$84.44	\$82.53	
3/11/2025	\$74.23	\$72.05	3/11/2025	\$132.83	\$131.11	3/11/2025	\$119.51	\$117.20	3/11/2025	\$83.26	\$80.29	
3/10/2025	\$74.88	\$73.00	3/10/2025	\$133.94	\$130.15	3/10/2025	\$119.26	\$116.91	3/10/2025	\$81.22	\$78.95	
3/7/2025	\$73.46	\$71.50	3/7/2025	\$132.55	\$130.57	3/7/2025	\$116.94	\$114.32	3/7/2025	\$82.45	\$79.93	
3/6/2025	\$72.49	\$71.28	3/6/2025	\$132.01	\$129.69	3/6/2025	\$115.68	\$113.81	3/6/2025	\$83.94	\$80.99	
3/5/2025	\$73.05	\$71.95	3/5/2025	\$133.09	\$130.72	3/5/2025	\$116.91	\$115.05	3/5/2025	\$85.39	\$83.96	
3/4/2025	\$75.06	\$72.82	3/4/2025	\$136.28	\$131.63	3/4/2025	\$119.68	\$116.37	3/4/2025	\$88.00	\$84.95	
3/3/2025	\$74.19	\$72.68	3/3/2025	\$135.24	\$132.95	3/3/2025	\$118.72	\$116.66	3/3/2025	\$88.02	\$86.60	
2/28/2025	\$73.34	\$72.04	2/28/2025	\$134.11	\$131.72	2/28/2025	\$117.98	\$115.80	2/28/2025	\$87.51	\$85.27	
2/27/2025	\$73.35	\$72.26	2/27/2025	\$133.00	\$131.19	2/27/2025	\$116.79	\$115.00	2/27/2025	\$86.91	\$85.13	
2/26/2025	\$73.36	\$72.57	2/26/2025	\$133.42	\$131.84	2/26/2025	\$117.14	\$115.80	2/26/2025	\$86.99	\$85.77	
2/25/2025	\$73.37	\$72.01	2/25/2025	\$133.49	\$132.39	2/25/2025	\$117.71	\$116.01	2/25/2025	\$85.67	\$83.30	
2/24/2025	\$71.16	\$71.16	2/24/2025	\$130.45	\$130.85	2/24/2025	\$116.41	\$114.79	2/24/2025	\$85.80	\$83.92	
2/21/2025	\$71.94	\$70.57	2/21/2025	\$132.88	\$129.80	2/21/2025	\$115.96	\$112.56	2/21/2025	\$86.37	\$84.22	
2/20/2025	\$71.00	\$70.07	2/20/2025	\$131.84	\$128.27	2/20/2025	\$113.26	\$111.04	2/20/2025	\$87.31	\$85.22	
2/19/2025	\$70.24	\$69.46	2/19/2025	\$130.53	\$128.97	2/19/2025	\$112.11	\$110.95	2/19/2025	\$87.89	\$86.47	
2/18/2025	\$69.89	\$68.91	2/18/2025	\$130.36	\$128.57	2/18/2025	\$112.23	\$110.51	2/18/2025	\$88.38	\$85.00	
2/14/2025	\$69.78	\$68.74	2/14/2025	\$130.22	\$128.34	2/14/2025	\$113.95	\$111.53	2/14/2025	\$84.46	\$82.45	
2/13/2025	\$70.03	\$69.41	2/13/2025	\$128.74	\$123.48	2/13/2025	\$115.66	\$112.88	2/13/2025	\$83.69	\$82.23	
2/12/2025	\$69.68	\$68.35	2/12/2025	\$124.55	\$122.85	2/12/2025	\$116.48	\$114.34	2/12/2025	\$83.00	\$80.60	
2/11/2025	\$69.48	\$68.23	2/11/2025	\$124.94	\$122.22	2/11/2025	\$116.81	\$113.98	2/11/2025	\$82.14	\$80.73	
2/10/2025	\$69.18	\$68.03	2/10/2025	\$123.82	\$122.12	2/10/2025	\$115.62	\$113.66	2/10/2025	\$82.04	\$80.72	
2/7/2025	\$68.74	\$67.04	2/7/2025	\$122.88	\$121.45	2/7/2025	\$115.70	\$113.92	2/7/2025	\$83.45	\$81.71	
2/6/2025	\$68.33	\$66.53	2/6/2025	\$123.00	\$121.58	2/6/2025	\$114.91	\$113.36	2/6/2025	\$83.36	\$82.32	
2/5/2025	\$68.42	\$66.48	2/5/2025	\$123.24	\$121.19	2/5/2025	\$114.21	\$112.45	2/5/2025	\$83.26	\$81.71	
2/4/2025	\$66.31	\$65.50	2/4/2025	\$121.13	\$119.00	2/4/2025	\$112.83	\$111.32	2/4/2025	\$82.50	\$80.66	
2/3/2025	\$66.71	\$65.17	2/3/2025	\$121.40	\$118.20	2/3/2025	\$113.46	\$111.20	2/3/2025	\$82.19	\$79.62	
1/31/2025	\$66.51	\$65.83	1/31/2025	\$120.73	\$118.82	1/31/2025	\$112.45	\$111.38	1/31/2025	\$81.74	\$80.71	
1/30/2025	\$66.51	\$65.51	1/30/2025	\$119.73	\$118.25	1/30/2025	\$112.40	\$110.81	1/30/2025	\$81.50	\$80.07	
1/29/2025	\$66.29	\$65.71	1/29/2025	\$119.67	\$117.56	1/29/2025	\$112.21	\$110.54	1/29/2025	\$80.24	\$77.68	
1/28/2025	\$67.13	\$65.35	1/28/2025	\$121.26	\$118.06	1/28/2025	\$112.70	\$111.28	1/28/2025	\$79.09	\$75.55	
1/27/2025	\$67.56	\$65.47	1/27/2025	\$122.13	\$118.11	1/27/2025	\$112.76	\$109.43	1/27/2025	\$82.67	\$77.75	
1/24/2025	\$66.26	\$65.55	1/24/2025	\$120.25	\$118.86	1/24/2025	\$110.25	\$108.74	1/24/2025	\$82.80	\$81.71	
1/23/2025	\$66.88	\$65.10	1/23/2025	\$121.25	\$116.30	1/23/2025	\$109.74	\$108.68	1/23/2025	\$83.16	\$81.73	
1/22/2025	\$68.08	\$66.42	1/22/2025	\$123.42	\$119.90	1/22/2025	\$110.62	\$108.63	1/22/2025	\$83.43	\$82.08	
1/21/2025	\$68.94	\$68.20	1/21/2025	\$125.60	\$123.44	1/21/2025	\$111.35	\$109.30	1/21/2025	\$84.26	\$82.60	
1/17/2025	\$68.68	\$67.61	1/17/2025	\$124.09	\$121.40	1/17/2025	\$109.90	\$108.45	1/17/2025	\$82.50	\$80.88	
1/16/2025	\$68.02	\$66.45	1/16/2025	\$123.00	\$120.28	1/16/2025	\$109.08	\$108.90	1/16/2025	\$81.37	\$78.66	
1/15/2025	\$66.83	\$65.80	1/15/2025	\$121.73	\$120.11	1/15/2025	\$108.10	\$106.35	1/15/2025	\$79.34	\$78.18	
1/14/2025	\$65.90	\$64.41	1/14/2025	\$120.15	\$117.95	1/14/2025	\$106.88	\$105.61	1/14/2025	\$77.94	\$76.64	
1/13/2025	\$65.23	\$63.97	1/13/2025	\$119.08	\$116.76	1/13/2025	\$106.56	\$105.20	1/13/2025	\$77.16	\$75.04	
1/10/2025	\$66.48	\$64.97	1/10/2025	\$120.80	\$118.36	1/10/2025	\$108.59	\$105.44	1/10/2025	\$76.80	\$75.47	
1/8/2025	\$66.41	\$65.34	1/8/2025	\$121.09	\$118.95	1/8/2025	\$108.45	\$106.49	1/8/2025	\$76.88	\$75.19	
1/7/202												

IDACORP, Inc. IDA			NextEra Energy, Inc. NEE			N.W. Energy Grp. Inc. NWE			OGE Energy Corp. OGE			Schedule AHG - 2 25-EKCE-294-RTS
6 Month	High	Low	6 Month	High	Low	6 Month	High	Low	6 Month	High	Low	
Range	\$120.84	\$100.10	Range	\$79.89	\$61.72	Range	\$59.89	\$50.43	Range	\$46.91	\$39.10	
Mean	\$114.38	\$112.26	Mean	\$72.44	\$70.74	Mean	\$55.20	\$54.12	Mean	\$43.62	\$42.78	
Median	\$115.00	\$112.69	Median	\$71.94	\$70.51	Median	\$54.92	\$53.90	Median	\$43.62	\$42.74	
3 Month			3 Month			3 Month			3 Month			
Range	\$120.84	\$108.68	Range	\$76.29	\$61.72	Range	\$59.89	\$51.66	Range	\$46.91	\$40.80	
Mean	\$115.97	\$113.61	Mean	\$70.39	\$68.54	Mean	\$56.28	\$55.07	Mean	\$44.90	\$43.96	
Median	\$116.07	\$113.81	Median	\$70.64	\$69.08	Median	\$56.20	\$54.93	Median	\$45.13	\$44.34	
4/29/2025	\$118.60	\$117.08	4/29/2025	\$67.40	\$65.72	4/29/2025	\$59.89	\$58.43	4/29/2025	\$45.83	\$45.29	
4/28/2025	\$117.92	\$115.98	4/28/2025	\$66.34	\$65.28	4/28/2025	\$58.89	\$57.74	4/28/2025	\$45.57	\$44.56	
4/25/2025	\$117.46	\$115.42	4/25/2025	\$66.87	\$65.36	4/25/2025	\$58.51	\$57.81	4/25/2025	\$45.24	\$44.78	
4/24/2025	\$118.66	\$115.38	4/24/2025	\$67.20	\$65.24	4/24/2025	\$58.58	\$58.01	4/24/2025	\$45.53	\$44.64	
4/23/2025	\$118.20	\$114.75	4/23/2025	\$69.10	\$66.99	4/23/2025	\$58.90	\$57.83	4/23/2025	\$45.59	\$44.78	
4/22/2025	\$118.47	\$116.66	4/22/2025	\$66.80	\$65.35	4/22/2025	\$59.08	\$58.04	4/22/2025	\$45.38	\$44.52	
4/21/2025	\$119.44	\$115.74	4/21/2025	\$66.06	\$63.64	4/21/2025	\$59.08	\$58.00	4/21/2025	\$45.12	\$43.74	
4/17/2025	\$117.08	\$117.96	4/17/2025	\$67.34	\$65.97	4/17/2025	\$59.15	\$57.73	4/17/2025	\$45.74	\$44.72	
4/16/2025	\$120.82	\$117.53	4/16/2025	\$68.05	\$65.30	4/16/2025	\$58.34	\$57.37	4/16/2025	\$45.34	\$44.62	
4/15/2025	\$120.82	\$119.24	4/15/2025	\$68.44	\$67.53	4/15/2025	\$57.86	\$57.29	4/15/2025	\$45.12	\$44.67	
4/14/2025	\$119.69	\$117.51	4/14/2025	\$68.12	\$65.96	4/14/2025	\$57.33	\$56.36	4/14/2025	\$44.96	\$44.22	
4/11/2025	\$117.71	\$113.98	4/11/2025	\$66.99	\$64.60	4/11/2025	\$56.58	\$54.89	4/11/2025	\$44.33	\$43.02	
4/10/2025	\$116.89	\$113.58	4/10/2025	\$67.50	\$65.24	4/10/2025	\$56.10	\$54.26	4/10/2025	\$43.92	\$42.62	
4/9/2025	\$115.80	\$109.30	4/9/2025	\$67.79	\$61.72	4/9/2025	\$56.85	\$53.46	4/9/2025	\$43.62	\$40.80	
4/8/2025	\$116.16	\$111.92	4/8/2025	\$66.59	\$63.20	4/8/2025	\$56.10	\$54.11	4/8/2025	\$43.59	\$41.74	
4/7/2025	\$114.99	\$110.14	4/7/2025	\$67.27	\$63.93	4/7/2025	\$56.62	\$53.83	4/7/2025	\$43.65	\$41.17	
4/4/2025	\$120.48	\$113.57	4/4/2025	\$73.42	\$66.86	4/4/2025	\$58.00	\$55.73	4/4/2025	\$46.22	\$43.30	
4/3/2025	\$120.84	\$118.80	4/3/2025	\$72.96	\$71.37	4/3/2025	\$59.52	\$58.08	4/3/2025	\$46.91	\$45.93	
4/2/2025	\$119.28	\$117.78	4/2/2025	\$71.29	\$70.13	4/2/2025	\$58.99	\$57.99	4/2/2025	\$46.49	\$45.77	
4/1/2025	\$117.52	\$115.30	4/1/2025	\$71.57	\$70.52	4/1/2025	\$58.71	\$57.27	4/1/2025	\$46.22	\$45.58	
3/31/2025	\$116.45	\$115.10	3/31/2025	\$71.75	\$70.62	3/31/2025	\$58.06	\$56.84	3/31/2025	\$46.29	\$45.38	
3/28/2025	\$115.54	\$114.28	3/28/2025	\$70.98	\$70.17	3/28/2025	\$57.00	\$55.79	3/28/2025	\$45.76	\$45.18	
3/27/2025	\$114.96	\$113.83	3/27/2025	\$71.02	\$69.61	3/27/2025	\$55.97	\$55.44	3/27/2025	\$45.35	\$44.85	
3/26/2025	\$114.22	\$112.32	3/26/2025	\$69.84	\$68.68	3/26/2025	\$55.65	\$54.64	3/26/2025	\$45.01	\$44.35	
3/25/2025	\$113.81	\$111.41	3/25/2025	\$70.48	\$68.42	3/25/2025	\$55.67	\$54.08	3/25/2025	\$44.98	\$44.04	
3/24/2025	\$115.34	\$113.76	3/24/2025	\$71.79	\$69.91	3/24/2025	\$55.86	\$55.30	3/24/2025	\$45.61	\$45.00	
3/21/2025	\$116.81	\$113.62	3/21/2025	\$71.96	\$70.17	3/21/2025	\$56.36	\$55.01	3/21/2025	\$45.43	\$44.67	
3/20/2025	\$117.31	\$116.07	3/20/2025	\$72.09	\$70.59	3/20/2025	\$56.49	\$55.95	3/20/2025	\$45.40	\$45.04	
3/19/2025	\$117.02	\$114.89	3/19/2025	\$71.18	\$70.00	3/19/2025	\$56.56	\$55.65	3/19/2025	\$45.23	\$44.59	
3/18/2025	\$116.55	\$114.80	3/18/2025	\$72.21	\$70.27	3/18/2025	\$56.26	\$55.37	3/18/2025	\$45.03	\$44.36	
3/17/2025	\$117.05	\$115.63	3/17/2025	\$73.43	\$71.07	3/17/2025	\$56.54	\$55.86	3/17/2025	\$45.31	\$44.33	
3/14/2025	\$116.14	\$113.79	3/14/2025	\$73.68	\$72.33	3/14/2025	\$56.14	\$54.94	3/14/2025	\$45.28	\$44.36	
3/13/2025	\$115.96	\$114.09	3/13/2025	\$73.55	\$72.05	3/13/2025	\$55.86	\$54.88	3/13/2025	\$45.05	\$44.21	
3/12/2025	\$115.71	\$114.62	3/12/2025	\$73.38	\$71.78	3/12/2025	\$55.25	\$54.17	3/12/2025	\$44.68	\$43.83	
3/11/2025	\$116.50	\$115.12	3/11/2025	\$76.26	\$73.20	3/11/2025	\$56.75	\$55.23	3/11/2025	\$44.73	\$43.92	
3/10/2025	\$115.60	\$113.15	3/10/2025	\$76.29	\$72.48	3/10/2025	\$57.44	\$56.02	3/10/2025	\$44.95	\$43.73	
3/7/2025	\$114.48	\$112.52	3/7/2025	\$73.12	\$70.06	3/7/2025	\$56.43	\$54.93	3/7/2025	\$44.46	\$43.69	
3/6/2025	\$113.45	\$111.56	3/6/2025	\$70.11	\$69.02	3/6/2025	\$55.35	\$54.31	3/6/2025	\$44.42	\$43.72	
3/5/2025	\$115.17	\$113.31	3/5/2025	\$70.89	\$69.39	3/5/2025	\$55.85	\$54.92	3/5/2025	\$45.13	\$44.36	
3/4/2025	\$119.58	\$115.03	3/4/2025	\$73.08	\$70.76	3/4/2025	\$57.16	\$55.53	3/4/2025	\$46.54	\$45.06	
3/3/2025	\$119.53	\$117.20	3/3/2025	\$71.70	\$70.00	3/3/2025	\$56.66	\$55.48	3/3/2025	\$46.54	\$45.57	
2/28/2025	\$118.19	\$115.30	2/28/2025	\$70.22	\$69.28	2/28/2025	\$55.95	\$54.88	2/28/2025	\$46.28	\$45.31	
2/27/2025	\$115.79	\$114.22	2/27/2025	\$70.91	\$69.31	2/27/2025	\$55.22	\$53.60	2/27/2025	\$45.48	\$44.75	
2/26/2025	\$116.50	\$114.92	2/26/2025	\$71.64	\$70.51	2/26/2025	\$54.76	\$54.09	2/26/2025	\$45.69	\$44.80	
2/25/2025	\$115.99	\$113.73	2/25/2025	\$71.71	\$70.68	2/25/2025	\$54.92	\$54.11	2/25/2025	\$45.40	\$44.79	
2/24/2025	\$115.96	\$114.50	2/24/2025	\$71.40	\$70.45	2/24/2025	\$54.69	\$53.92	2/24/2025	\$45.60	\$44.79	
2/21/2025	\$115.13	\$111.62	2/21/2025	\$71.97	\$70.01	2/21/2025	\$54.17	\$53.52	2/21/2025	\$45.32	\$44.04	
2/20/2025	\$115.00	\$111.89	2/20/2025	\$70.44	\$68.82	2/20/2025	\$53.81	\$52.69	2/20/2025	\$44.43	\$43.45	
2/19/2025	\$112.50	\$110.95	2/19/2025	\$69.51	\$68.41	2/19/2025	\$53.78	\$52.89	2/19/2025	\$44.72	\$42.89	
2/18/2025	\$110.98	\$109.78	2/18/2025	\$68.55	\$67.53	2/18/2025	\$53.15	\$51.82	2/18/2025	\$44.00	\$43.51	
2/14/2025	\$112.31	\$109.55	2/14/2025	\$69.02	\$67.88	2/14/2025	\$53.61	\$51.66	2/14/2025	\$44.19	\$43.45	
2/13/2025	\$112.31	\$110.85	2/13/2025	\$69.66	\$68.56	2/13/2025	\$53.93	\$51.81	2/13/2025	\$43.88	\$43.39	
2/12/2025	\$111.49	\$109.46	2/12/2025	\$70.19	\$68.98	2/12/2025	\$54.27	\$53.42	2/12/2025	\$43.43	\$42.74	
2/11/2025	\$111.66	\$109.10	2/11/2025	\$70.38	\$68.71	2/11/2025	\$54.73	\$53.44	2/11/2025	\$43.47	\$42.46	
2/10/2025	\$110.87	\$109.62	2/10/2025	\$69.74	\$68.09	2/10/2025	\$53.82	\$52.69	2/10/2025	\$43.03	\$42.30	
2/7/2025	\$111.69	\$110.11	2/7/2025	\$69.39	\$68.20	2/7/2025	\$53.65	\$52.94	2/7/2025	\$42.90	\$42.14	
2/6/2025	\$111.36	\$110.19	2/6/2025	\$69.62	\$68.26	2/6/2025	\$54.25	\$53.03	2/6/2025	\$42.84	\$42.21	
2/5/2025	\$111.23	\$110.47	2/5/2025	\$70.79	\$69.14	2/5/2025	\$54.38	\$53.76	2/5/2025	\$42.99	\$42.53	
2/4/2025	\$111.25	\$109.20	2/4/2025	\$70.85	\$69.62	2/4/2025	\$53.71	\$52.85	2/4/2025	\$42.47	\$41.60	
2/3/2025	\$110.77	\$108.68	2/3/2025	\$71.79	\$70.19	2/3/2025	\$53.99	\$53.00	2/3/2025	\$42.40	\$41.51	
1/31/2025	\$110.61	\$109.66	1/31/2025	\$71.73	\$70.93	1/31/2025	\$54.47	\$53.76	1/31/2025	\$42.84	\$42.05	
1/30/2025	\$110.07	\$108.80	1/30/2025	\$72.00	\$70.79	1/30/2025	\$54.78	\$53.90	1/30/2025	\$42.95	\$42.49	
1/29/2025	\$109.25	\$108.31	1/29/2025	\$71.52	\$70.61	1/29/2025	\$54.47	\$53.30	1/29/2025	\$42.48	\$41.93	
1/28/2025	\$109.54	\$107.95	1/28/2025	\$72.88	\$69.92	1/28/2025	\$55.30	\$54.19	1/28/2025	\$42.80	\$41.82	
1/27/2025	\$109.90	\$108.24	1/27/2025	\$73.93	\$70.64	1/27/2025	\$54.97	\$53.71	1/27/2025	\$43.39	\$41.69	
1/24/2025	\$109.37	\$107.64	1/24/2025	\$74.05	\$68.00	1/24/2025	\$54.24	\$53.33	1/24/2025	\$43.43	\$43.00	
1/23/2025	\$109.12	\$107.27	1/23/2025	\$69.35	\$68.27	1/23/2025	\$54.05	\$53.44	1/23/2025	\$43.23	\$42.42	
1/22/2025	\$111.34	\$107.64	1/22/2025	\$70.57	\$68.34	1/22/2025	\$54.65	\$53.16	1/22/2025	\$43.25	\$42.45	
1/21/2025	\$112.69	\$111.26	1/21/2025	\$71.88	\$70.78	1/21/2025	\$55.46	\$54.70	1/21/2025	\$43.62	\$42.96	
1/17/2025	\$110.94	\$109.88	1/17/2025	\$71.84	\$70.74	1/17/2025	\$54.79	\$54.10	1/17/2025	\$42.73	\$42.10	
1/16/2025	\$110.33	\$106.93	1/16/2025	\$70.42	\$68.89	1/16/2025	\$54.35	\$52.86	1/16/2025	\$42.39	\$41.03	
1/15/2025	\$108.60	\$106.91	1/15/2025	\$70.04	\$69.01	1/15/2025	\$53.52	\$52.81	1/15/2025	\$41.44	\$40.92	
1/14/2025	\$107.13	\$105.31	1/14/2025	\$68.01	\$66.88	1/14/2025	\$52.41	\$51.63	1/14/2025	\$40.87	\$40.14	
1/13/2025	\$107.22	\$104.74	1/13/2025	\$67.36	\$65.89	1/13/2025	\$51.62	\$51.07	1/13/2025	\$40.04	\$39.41	
1/10/2025	\$110.23	\$106.29	1/10/2025	\$70.07	\$67.07	1/10/2025	\$52.28	\$50.77	1/10/2025	\$40.71	\$39.71	
1/8/2025	\$110.44	\$107.68	1/8/2025	\$70.70	\$69.46	1/8/2025	\$52.50	\$51.35	1/8/2025	\$40.89	\$40.11	
1/7/2025	\$109.37	\$107.30	1/7/2025	\$71.90	\$70.06	1/7/2025	\$52.24	\$51.66				

Pinnacle West Capital Corp. PNW			Portland Gen. Electric Co. POR			PPL Corp. PPL			The Southern Co. SO			Xcel Energy, Inc. XEL		
6 Month Range	High	Low	6 Month Range	High	Low	6 Month Range	High	Low	6 Month Range	High	Low	6 Month Range	High	Low
Mean	\$96.50	\$81.47	Mean	\$48.40	\$40.05	Mean	\$36.66	\$31.22	Mean	\$93.65	\$80.46	Mean	\$74.44	\$67.85
Median	\$90.77	\$89.06	Median	\$44.38	\$43.54	Median	\$34.18	\$33.56	Median	\$87.77	\$86.18	Median	\$69.24	\$67.85
	\$91.73	\$89.74		\$44.30	\$43.51		\$34.32	\$33.71		\$88.63	\$87.00		\$69.39	\$68.05
3 Month Range	High	Low	3 Month Range	High	Low	3 Month Range	High	Low	3 Month Range	High	Low	3 Month Range	High	Low
Mean	\$96.50	\$85.03	Mean	\$45.91	\$40.29	Mean	\$36.66	\$32.50	Mean	\$93.65	\$82.78	Mean	\$73.00	\$65.43
Median	\$92.81	\$90.98	Median	\$43.66	\$42.73	Median	\$35.15	\$34.43	Median	\$89.79	\$88.01	Median	\$70.04	\$68.45
	\$93.20	\$91.15		\$43.87	\$43.02		\$35.01	\$34.35		\$90.16	\$88.60		\$70.07	\$68.44
4/29/2025	\$95.58	\$94.18	4/29/2025	\$42.05	\$41.14	4/29/2025	\$36.57	\$36.16	4/29/2025	\$91.60	\$90.34	4/29/2025	\$70.77	\$69.22
4/28/2025	\$94.70	\$93.13	4/28/2025	\$41.56	\$40.74	4/28/2025	\$36.52	\$35.85	4/28/2025	\$91.05	\$89.82	4/28/2025	\$69.68	\$68.46
4/25/2025	\$94.45	\$93.36	4/25/2025	\$42.99	\$41.03	4/25/2025	\$36.34	\$35.87	4/25/2025	\$91.34	\$90.15	4/25/2025	\$70.55	\$68.41
4/24/2025	\$95.65	\$93.74	4/24/2025	\$43.50	\$42.80	4/24/2025	\$36.62	\$35.89	4/24/2025	\$91.44	\$90.27	4/24/2025	\$71.48	\$69.01
4/23/2025	\$95.15	\$93.48	4/23/2025	\$43.87	\$43.00	4/23/2025	\$36.66	\$35.86	4/23/2025	\$91.58	\$90.17	4/23/2025	\$72.10	\$70.58
4/22/2025	\$95.78	\$93.86	4/22/2025	\$43.87	\$42.90	4/22/2025	\$36.31	\$35.55	4/22/2025	\$92.22	\$90.25	4/22/2025	\$71.71	\$69.19
4/21/2025	\$94.19	\$92.26	4/21/2025	\$43.30	\$42.01	4/21/2025	\$35.64	\$34.78	4/21/2025	\$91.71	\$89.58	4/21/2025	\$70.30	\$68.38
4/17/2025	\$96.13	\$93.66	4/17/2025	\$43.74	\$42.06	4/17/2025	\$35.45	\$35.24	4/17/2025	\$93.04	\$90.81	4/17/2025	\$71.03	\$69.50
4/16/2025	\$94.98	\$93.09	4/16/2025	\$43.64	\$42.80	4/16/2025	\$35.70	\$35.15	4/16/2025	\$91.90	\$90.26	4/16/2025	\$70.82	\$68.86
4/15/2025	\$95.00	\$93.60	4/15/2025	\$43.66	\$43.04	4/15/2025	\$35.72	\$35.33	4/15/2025	\$91.70	\$90.93	4/15/2025	\$71.48	\$70.21
4/14/2025	\$94.00	\$92.15	4/14/2025	\$43.28	\$42.36	4/14/2025	\$35.55	\$34.84	4/14/2025	\$91.69	\$89.16	4/14/2025	\$70.87	\$68.28
4/11/2025	\$92.53	\$89.13	4/11/2025	\$42.37	\$41.18	4/11/2025	\$34.87	\$33.75	4/11/2025	\$90.18	\$87.68	4/11/2025	\$69.93	\$67.52
4/10/2025	\$91.32	\$88.25	4/10/2025	\$42.09	\$40.77	4/10/2025	\$34.62	\$33.53	4/10/2025	\$89.70	\$87.00	4/10/2025	\$69.31	\$67.01
4/9/2025	\$91.46	\$86.55	4/9/2025	\$43.04	\$40.29	4/9/2025	\$34.50	\$32.50	4/9/2025	\$89.40	\$85.00	4/9/2025	\$69.17	\$65.43
4/8/2025	\$91.75	\$87.96	4/8/2025	\$42.86	\$40.94	4/8/2025	\$34.46	\$33.12	4/8/2025	\$88.69	\$86.16	4/8/2025	\$69.20	\$66.35
4/7/2025	\$91.58	\$87.44	4/7/2025	\$42.74	\$40.74	4/7/2025	\$34.31	\$32.89	4/7/2025	\$89.43	\$86.36	4/7/2025	\$68.38	\$65.75
4/4/2025	\$95.88	\$90.49	4/4/2025	\$44.39	\$42.28	4/4/2025	\$36.49	\$34.27	4/4/2025	\$93.65	\$88.49	4/4/2025	\$73.00	\$67.78
4/3/2025	\$96.50	\$95.04	4/3/2025	\$45.17	\$44.28	4/3/2025	\$36.64	\$36.01	4/3/2025	\$93.30	\$92.00	4/3/2025	\$72.64	\$71.15
4/2/2025	\$95.84	\$94.51	4/2/2025	\$44.84	\$44.43	4/2/2025	\$36.31	\$35.77	4/2/2025	\$92.05	\$90.71	4/2/2025	\$71.30	\$70.06
4/1/2025	\$95.34	\$94.23	4/1/2025	\$44.23	\$44.11	4/1/2025	\$36.10	\$35.72	4/1/2025	\$92.17	\$90.54	4/1/2025	\$71.02	\$69.97
3/31/2025	\$95.83	\$94.50	3/31/2025	\$45.16	\$44.27	3/31/2025	\$36.42	\$35.79	3/31/2025	\$92.69	\$91.09	3/31/2025	\$71.32	\$69.90
3/28/2025	\$95.04	\$93.32	3/28/2025	\$44.57	\$43.87	3/28/2025	\$35.97	\$35.06	3/28/2025	\$91.44	\$90.27	3/28/2025	\$70.49	\$69.64
3/27/2025	\$93.96	\$92.90	3/27/2025	\$43.85	\$43.05	3/27/2025	\$35.08	\$34.58	3/27/2025	\$90.28	\$89.00	3/27/2025	\$69.80	\$68.93
3/26/2025	\$93.18	\$91.56	3/26/2025	\$43.29	\$42.52	3/26/2025	\$34.67	\$34.10	3/26/2025	\$89.20	\$87.85	3/26/2025	\$69.44	\$67.99
3/25/2025	\$92.97	\$90.98	3/25/2025	\$43.42	\$42.41	3/25/2025	\$34.71	\$33.91	3/25/2025	\$88.92	\$87.40	3/25/2025	\$68.79	\$67.50
3/24/2025	\$94.23	\$92.91	3/24/2025	\$43.88	\$43.33	3/24/2025	\$35.01	\$34.65	3/24/2025	\$90.14	\$88.77	3/24/2025	\$69.65	\$68.71
3/21/2025	\$94.71	\$93.25	3/21/2025	\$44.43	\$43.63	3/21/2025	\$35.01	\$34.44	3/21/2025	\$90.67	\$88.75	3/21/2025	\$70.36	\$68.82
3/20/2025	\$94.52	\$93.80	3/20/2025	\$44.59	\$44.10	3/20/2025	\$35.14	\$34.85	3/20/2025	\$90.06	\$89.14	3/20/2025	\$70.58	\$69.80
3/19/2025	\$94.51	\$93.10	3/19/2025	\$44.68	\$43.98	3/19/2025	\$35.02	\$34.66	3/19/2025	\$90.49	\$89.27	3/19/2025	\$70.50	\$69.84
3/18/2025	\$94.28	\$92.95	3/18/2025	\$44.80	\$44.25	3/18/2025	\$35.12	\$34.59	3/18/2025	\$90.47	\$89.66	3/18/2025	\$70.33	\$69.40
3/17/2025	\$94.86	\$93.69	3/17/2025	\$45.36	\$44.54	3/17/2025	\$35.42	\$34.88	3/17/2025	\$91.41	\$89.87	3/17/2025	\$70.70	\$69.54
3/14/2025	\$93.86	\$91.60	3/14/2025	\$44.96	\$44.13	3/14/2025	\$35.01	\$34.02	3/14/2025	\$90.54	\$88.78	3/14/2025	\$69.91	\$67.88
3/13/2025	\$92.37	\$91.16	3/13/2025	\$44.44	\$43.71	3/13/2025	\$34.71	\$33.91	3/13/2025	\$90.00	\$88.68	3/13/2025	\$69.76	\$68.15
3/12/2025	\$91.76	\$90.12	3/12/2025	\$44.30	\$43.51	3/12/2025	\$34.36	\$33.92	3/12/2025	\$89.61	\$88.30	3/12/2025	\$69.70	\$68.17
3/11/2025	\$92.29	\$90.67	3/11/2025	\$45.12	\$44.04	3/11/2025	\$34.64	\$34.07	3/11/2025	\$92.68	\$89.96	3/11/2025	\$69.64	\$68.11
3/10/2025	\$93.62	\$91.03	3/10/2025	\$45.65	\$44.61	3/10/2025	\$34.57	\$33.76	3/10/2025	\$93.48	\$91.20	3/10/2025	\$69.89	\$68.05
3/7/2025	\$92.67	\$90.55	3/7/2025	\$44.77	\$43.87	3/7/2025	\$34.40	\$33.80	3/7/2025	\$91.77	\$88.52	3/7/2025	\$68.61	\$67.52
3/6/2025	\$91.02	\$89.48	3/6/2025	\$44.04	\$43.21	3/6/2025	\$34.46	\$33.75	3/6/2025	\$89.16	\$87.09	3/6/2025	\$68.58	\$67.25
3/5/2025	\$92.09	\$90.63	3/5/2025	\$44.46	\$43.68	3/5/2025	\$34.94	\$34.31	3/5/2025	\$90.19	\$88.38	3/5/2025	\$70.22	\$68.60
3/4/2025	\$94.57	\$91.77	3/4/2025	\$45.91	\$44.39	3/4/2025	\$35.91	\$34.65	3/4/2025	\$92.33	\$89.76	3/4/2025	\$72.70	\$69.98
3/3/2025	\$94.27	\$92.19	3/3/2025	\$45.37	\$44.72	3/3/2025	\$35.69	\$35.14	3/3/2025	\$90.85	\$89.34	3/3/2025	\$72.64	\$71.36
2/28/2025	\$92.56	\$91.14	2/28/2025	\$44.88	\$44.26	2/28/2025	\$35.28	\$34.58	2/28/2025	\$89.80	\$88.33	2/28/2025	\$72.39	\$71.10
2/27/2025	\$92.27	\$90.68	2/27/2025	\$44.30	\$43.34	2/27/2025	\$35.01	\$34.39	2/27/2025	\$89.07	\$87.95	2/27/2025	\$70.97	\$69.57
2/26/2025	\$93.22	\$91.49	2/26/2025	\$44.68	\$44.12	2/26/2025	\$35.11	\$34.71	2/26/2025	\$89.46	\$88.23	2/26/2025	\$70.48	\$69.49
2/25/2025	\$93.54	\$91.94	2/25/2025	\$44.85	\$44.25	2/25/2025	\$35.07	\$34.76	2/25/2025	\$89.03	\$88.93	2/25/2025	\$71.05	\$70.14
2/24/2025	\$92.56	\$91.08	2/24/2025	\$44.89	\$44.07	2/24/2025	\$34.51	\$33.91	2/24/2025	\$89.63	\$88.07	2/24/2025	\$69.49	\$67.91
2/21/2025	\$91.79	\$90.55	2/21/2025	\$44.57	\$43.81	2/21/2025	\$34.86	\$34.07	2/21/2025	\$88.98	\$87.10	2/21/2025	\$70.24	\$69.19
2/20/2025	\$91.08	\$89.47	2/20/2025	\$44.02	\$43.10	2/20/2025	\$34.49	\$34.00	2/20/2025	\$89.00	\$84.50	2/20/2025	\$69.44	\$68.20
2/19/2025	\$90.96	\$89.74	2/19/2025	\$43.54	\$42.67	2/19/2025	\$34.69	\$34.13	2/19/2025	\$86.61	\$85.38	2/19/2025	\$69.39	\$68.50
2/18/2025	\$90.03	\$89.00	2/18/2025	\$42.90	\$41.32	2/18/2025	\$34.27	\$33.71	2/18/2025	\$85.90	\$84.67	2/18/2025	\$69.14	\$68.27
2/14/2025	\$90.19	\$89.17	2/14/2025	\$42.80	\$41.35	2/14/2025	\$34.65	\$33.70	2/14/2025	\$87.48	\$85.48	2/14/2025	\$69.59	\$68.42
2/13/2025	\$89.67	\$88.80	2/13/2025	\$42.16	\$41.56	2/13/2025	\$34.88	\$33.45	2/13/2025	\$87.03	\$86.03	2/13/2025	\$68.58	\$67.26
2/12/2025	\$89.22	\$87.63	2/12/2025	\$41.86	\$41.25	2/12/2025	\$34.53	\$33.92	2/12/2025	\$86.87	\$85.00	2/12/2025	\$67.49	\$66.18
2/11/2025	\$89.22	\$87.16	2/11/2025	\$41.94	\$40.87	2/11/2025	\$34.54	\$33.76	2/11/2025	\$86.53	\$84.29	2/11/2025	\$67.23	\$65.99
2/10/2025	\$88.01	\$86.67	2/10/2025	\$41.20	\$40.56	2/10/2025	\$34.24	\$33.71	2/10/2025	\$85.53	\$84.18	2/10/2025	\$67.03	\$65.87
2/7/2025	\$88.22	\$86.84	2/7/2025	\$41.37	\$40.77	2/7/2025	\$34.27	\$33.87	2/7/2025	\$84.66	\$83.16	2/7/2025	\$67.89	\$66.43
2/6/2025	\$88.63	\$87.64	2/6/2025	\$41.41	\$40.92	2/6/2025	\$34.18	\$33.70	2/6/2025	\$84.23	\$82.90	2/6/2025	\$67.73	\$66.00
2/5/2025	\$88.63	\$87.36	2/5/2025	\$41.47	\$41.05	2/5/2025	\$34.05	\$33.65	2/5/2025	\$84.19	\$83.23	2/5/2025	\$67.49	\$67.38
2/4/2025	\$87.62	\$85.41	2/4/2025	\$41.04	\$40.37	2/4/2025	\$33.95	\$33.35	2/4/2025	\$83.89	\$82.78	2/4/2025	\$67.57	\$66.58
2/3/2025	\$87.06	\$85.03	2/3/2025	\$41.18	\$40.48	2/3/2025	\$33.85	\$33.26	2/3/2025	\$84.38	\$83.00	2/3/2025	\$67.98	\$66.45
1/31/2025	\$87.27	\$86.41	1/31/2025	\$41.38	\$40.94	1/31/2025	\$33.62	\$33.35	1/31/2025	\$84.74	\$83.43	1/31/2025	\$67.24	\$66.61
1/30/2025	\$87.31	\$86.58	1/30/2025	\$41.81	\$40.87	1/30/2025	\$33.50	\$33.03	1/30/2025	\$85.10	\$83.50	1/30/2025	\$67.04	\$66.23
1/29/2025	\$87.00	\$85.83	1/29/2025	\$41.87	\$41.12	1/29/2025	\$33.12	\$32.66	1/29/2025	\$84.45	\$82.69	1/29/2025	\$66.82	\$65.97
1/28/2025	\$87.95	\$86.03	1/28/2025	\$42.39	\$41.57	1/28/2025	\$33.55	\$32.66	1/28/2025	\$86.28	\$83.53	1/28/2025	\$67.86	\$66.18
1/27/2025	\$87.53	\$84.28												

STATE OF KANSAS                     )  
  ) ss.  
COUNTY OF SHAWNEE            )

**VERIFICATION**

Adam Gatewood, being duly sworn upon his oath deposes and states that he is a Senior Managing Financial Analyst of the Utilities Division of the Kansas Corporation Commission of the State of Kansas, that (he/she) has read and is familiar with the foregoing Direct Testimony, and attests that the statements contained therein are true and correct to the best of his knowledge, information and belief.

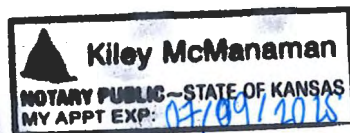


Adam Gatewood  
Senior Managing Financial Analyst  
State Corporation Commission of the  
State of Kansas

Subscribed and sworn to before me this 3rd day of June, 2025.



Notary Public



## **CERTIFICATE OF SERVICE**

25-EKCE-294-RTS

I, the undersigned, certify that a true copy of the attached Direct Testimony has been served to the following by means of electronic service on June 6, 2025.

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