BEFORE THE

RHODE ISLAND PUBLIC UTILITY COMMISSION

EXHIBIT TO ACCOMPANY THE

PREPARED REBUTTAL TESTIMONY

OF

PAULINE M. AHERN, CRRA PRINCIPAL AUS CONSULTANTS

CONCERNING

FAIR RATE OF RETURN

RE: UNITED WATER RHODE ISLAND, INC.

March 2014

United Water Rhode Island, Inc. Example of the Inadequacy of DCF Return Rate Related to Book Value When Market Value Exceeds Book Value

		Based on Mr. Kahal's Water Proxy Group				
Line No.	-	Mark	(a) et Value	(b) Book Value		
1.	Per Share	\$	28.900 (1)	\$	15.110 (2)	
2.	DCF Cost Rate		9.25% (3)		9.25% (3)	
3.	Return in Dollars	\$	2.673	\$	1.398	
4.	Dividends	\$	0.867 (4)	\$	0.867 (4)	
5.	Growth in Dollars	\$	1.806	\$	0.531	
6.	Return on Market Value (5)		9.25%		4.84%	
7.	Rate of Growth on Market Value (6)		6.25%		1.84%	

Notes:

- (1) Month-end prices from Standard & Poor's Stock Guide, July-December 2013.
 - (2) Derived from page 34 of Schedule PMA-8 Rebuttal.
 - (3) From Schedule MIK-4, page 1 of 5.
 - (4) Dividends per share based upon a 3.00% adjusted dividend yield. \$0.867 = \$28.900 * 3.00%.
 - (5) Line 3 / market value per share (line 1 column (a)).
 - (6) Line 6 dividend yield (9.25% 3.00% = 6.25%).

United Water Rhode Island, Inc. Corrected Common Equity Cost Rate Through Use of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>
Mr. Kahal's Water Utility Group	Value Line Adjusted Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate (3)	ECAPM Cost Rate (4)	Indicated Common Equity Cost Rate (5)
American States Water Co.	0.65	7.09 %	4.44 %	9.05 %	9.67 %	
American Water Works Co., Inc.	0.65	7.09	4.44	9.05	9.67	
Aqua America, Inc.	0.60	7.09	4.44	8.69	9.40	
California Water Service Group	0.60	7.09	4.44	8.69	9.40	
Connecticut Water Service, Inc.	0.75	7.09	4.44	9.76	10.20	
Middlesex Water Company	0.75	7.09	4.44	9.76	10.20	
SJW Corporation	0.85	7.09	4.44	10.47	10.73	
York Water Company	0.70	7.09	4.44	9.40	9.93	
Average	0.69			<u>9.36</u> %	<u>9.90</u> %	<u>9.63</u> %

See page 23 of Exhibit PMA-8 for notes.

NEW REGULATORY FINANCE

Roger A. Morin, PhD

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First Printing, June 2006

Library of Congress Cataloging-in-Publication Data

Morin, Roger A.
New regulatory finance/Roger A. Morin.
p. cm.
Rev. ed. of: Regulatory finance. 1994.
Includes bibliographical references and index.
ISBN-13: 978-0-910325-05-9
ISBN-10: 0-910325-05-7
Public utilities—United States—Finance. 2. Public utilities—Rate of return.
Public utilities—Law and legislation—United States. 4. Capital costs—United States. I. Morin, Roger A. Regulatory finance. II. Public Utilities Reports, Inc. III. Title.

HD2766.M62 2006 363.6068'1---dc22

2006018026

Printed in the United States of America

Chapter 6: Alternative Asset Pricing Models

The model is analogous to the standard CAPM, but with the return on a minimum risk portfolio that is unrelated to market returns, R_z , replacing the risk-free rate, R_F . The model has been empirically tested by Black, Jensen, and Scholes (1972), who find a flatter than predicted SML, consistent with the model and other researchers' findings. An updated version of the Black-Jensen-Scholes study is available in Brealey, Myers, and Allen (2006) and reaches similar conclusions.

The zero-beta CAPM cannot be literally employed to estimate the cost of capital, since the zero-beta portfolio is a statistical construct difficult to replicate. Attempts to estimate the model are formally equivalent to estimating the constants, a and b, in Equation 6-2. A practical alternative is to employ the Empirical CAPM, to which we now turn.

6.3 Empirical CAPM

As discussed in the previous section, several finance scholars have developed refined and expanded versions of the standard CAPM by relaxing the constraints imposed on the CAPM, such as dividend yield, size, and skewness effects. These enhanced CAPMs typically produce a risk-return relationship that is flatter than the CAPM prediction in keeping with the actual observed risk-return relationship. The ECAPM makes use of these empirical findings. The ECAPM estimates the cost of capital with the equation:

$$K = R_F + \dot{\alpha} + \beta \times (MRP - \dot{\alpha})$$
(6-5)

where $\dot{\alpha}$ is the "alpha" of the risk-return line, a constant, and the other symbols are defined as before. All the potential vagaries of the CAPM are telescoped into the constant $\dot{\alpha}$, which must be estimated econometrically from market data. Table 6-2 summarizes¹⁰ the empirical evidence on the magnitude of alpha.¹¹

¹⁰ The technique is formally applied by Litzenberger, Ramaswamy, and Sosin (1980) to public utilities in order to rectify the CAPM's basic shortcomings. Not only do they summarize the criticisms of the CAPM insofar as they affect public utilities, but they also describe the econometric intricacies involved and the methods of circumventing the statistical problems. Essentially, the average monthly returns over a lengthy time period on a large cross-section of securities grouped into portfolios are related to their corresponding betas by statistical regression techniques; that is, Equation 6-5 is estimated from market data. The utility's beta value is substituted into the equation to produce the cost of equity figure. Their own results demonstrate how the standard CAPM underestimates the cost of equity capital of public utilities because of utilities' high dividend yield and return skewness.

¹¹ Adapted from Vilbert (2004).

New Regulatory Finance

TABLE 6-2 EMPIRICAL EVIDENCE ON THE ALPHA FACTOR							
Range of alpha							
- 3.6% to 3.6% - 9.61% to 12.24% 4.08% to 9.36% 10.08% to 13.56% 5.32% to 8.17% 1.63% to 5.04% 4.6%							

For an alpha in the range of 1%-2% and for reasonable values of the market risk premium and the risk-free rate, Equation 6-5 reduces to the following more pragmatic form:

$$K = R_F + 0.25 (R_M - R_F) + 0.75 \beta(R_M - R_F)$$
(6-6)

Over reasonable values of the risk-free rate and the market risk premium, Equation 6-6 produces results that are indistinguishable from the ECAPM of Equation 6-5.¹²

An alpha range of 1%-2% is somewhat lower than that estimated empirically. The use of a lower value for alpha leads to a lower estimate of the cost of capital for low-beta stocks such as regulated utilities. This is because the use of a long-term risk-free rate rather than a short-term risk-free rate already incorporates some of the desired effect of using the ECAPM. That is, the

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

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

$$K = R_F + 0.25(R_M - R_F) + 0.75\beta(R_M - R_F)$$

¹² Typical of the empirical evidence on the validity of the CAPM is a study by Morin (1989) who found that the relationship between the expected return on a security and beta over the period 1926–1984 was given by:

Return = $0.0829 + 0.0520 \beta$

Given that the risk-free rate over the estimation period was approximately 6% and that the market risk premium was 8% during the period of study, the intercept of the observed relationship between return and beta exceeds the risk-free rate by about 2%, or 1/4 of 8%, and that the slope of the relationship is close to 3/4 of 8%. Therefore, the empirical evidence suggests that the expected return on a security is related to its risk by the following approximation:

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long-term risk-free rate version of the CAPM has a higher intercept and a flatter slope than the short-term risk-free version which has been tested. Thus, it is reasonable to apply a conservative alpha adjustment. Moreover, the lowering of the tax burden on capital gains and dividend income enacted in 2002 may have decreased the required return for taxable investors, steepening the slope of the ECAPM risk-return trade-off and bring it closer to the CAPM predicted returns.¹³

To illustrate the application of the ECAPM, assume a risk-free rate of 5%, a market risk premium of 7%, and a beta of 0.80. The Empirical CAPM equation (6-6) above yields a cost of equity estimate of 11.0% as follows:

 $K = 5\% + 0.25 (12\% - 5\%) + 0.75 \times 0.80 (12\% - 5\%)$ = 5.0% + 1.8% + 4.2%= 11.0%

As an alternative to specifying alpha, see Example 6-1.

Some have argued that the use of the ECAPM is inconsistent with the use of adjusted betas, such as those supplied by Value Line and Bloomberg. This is because the reason for using the ECAPM is to allow for the tendency of betas to regress toward the mean value of 1.00 over time, and, since Value Line betas are already adjusted for such trend, an ECAPM analysis results in double-counting. This argument is erroneous. Fundamentally, the ECAPM is not an adjustment, increase or decrease, in beta. This is obvious from the fact that the expected return on high beta securities is actually lower than that produced by the CAPM estimate. The ECAPM is a formal recognition that the observed risk-return tradeoff is flatter than predicted by the CAPM based on myriad empirical evidence. The ECAPM and the use of adjusted betas comprised two separate features of asset pricing. Even if a company's beta is estimated accurately, the CAPM still understates the return for low-beta stocks. Even if the ECAPM is used, the return for low-beta securities is understated if the betas are understated. Referring back to Figure 6-1, the ECAPM is a return (vertical axis) adjustment and not a beta (horizontal axis) adjustment. Both adjustments are necessary. Moreover, recall from Chapter 3 that the use of adjusted betas compensates for interest rate sensitivity of utility stocks not captured by unadjusted betas.

¹³ The lowering of the tax burden on capital gains and dividend income has no impact as far as non-taxable institutional investors (pension funds, 401K, and mutual funds) are concerned, and such investors engage in very large amounts of trading on security markets. It is quite plausible that taxable retail investors are relatively inactive traders and that large non-taxable investors have a substantial influence on capital markets.

Journal of Economic Perspectives—Volume 18, Number 3—Summer 2004—Pages 25-46

The Capital Asset Pricing Model: Theory and Evidence

Eugene F. Fama and Kenneth R. French

he capital asset pricing model (CAPM) of William Sharpe (1964) and John Lintner (1965) marks the birth of asset pricing theory (resulting in a Nobel Prize for Sharpe in 1990). Four decades later, the CAPM is still widely used in applications, such as estimating the cost of capital for firms and evaluating the performance of managed portfolios. It is the centerpiece of MBA investment courses. Indeed, it is often the only asset pricing model taught in these courses.¹

The attraction of the CAPM is that it offers powerful and intuitively pleasing predictions about how to measure risk and the relation between expected return and risk. Unfortunately, the empirical record of the model is poor—poor enough to invalidate the way it is used in applications. The CAPM's empirical problems may reflect theoretical failings, the result of many simplifying assumptions. But they may also be caused by difficulties in implementing valid tests of the model. For example, the CAPM says that the risk of a stock should be measured relative to a comprehensive "market portfolio" that in principle can include not just traded financial assets, but also consumer durables, real estate and human capital. Even if we take a narrow view of the model and limit its purview to traded financial assets, is it

¹ Although every asset pricing model is a capital asset pricing model, the finance profession reserves the acronym CAPM for the specific model of Sharpe (1964), Lintner (1965) and Black (1972) discussed here. Thus, throughout the paper we refer to the Sharpe-Lintner-Black model as the CAPM.

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legitimate to limit further the market portfolio to U.S. common stocks (a typical choice), or should the market be expanded to include bonds, and other financial assets, perhaps around the world? In the end, we argue that whether the model's problems reflect weaknesses in the theory or in its empirical implementation, the failure of the CAPM in empirical tests implies that most applications of the model are invalid.

We begin by outlining the logic of the CAPM, focusing on its predictions about risk and expected return. We then review the history of empirical work and what it says about shortcomings of the CAPM that pose challenges to be explained by alternative models.

The Logic of the CAPM

The CAPM builds on the model of portfolio choice developed by Harry Markowitz (1959). In Markowitz's model, an investor selects a portfolio at time t - 1 that produces a stochastic return at t. The model assumes investors are risk averse and, when choosing among portfolios, they care only about the mean and variance of their one-period investment return. As a result, investors choose "mean-variance-efficient" portfolios, in the sense that the portfolios 1) minimize the variance of portfolio return, given expected return, and 2) maximize expected return, given variance. Thus, the Markowitz approach is often called a "mean-variance model."

The portfolio model provides an algebraic condition on asset weights in meanvariance-efficient portfolios. The CAPM turns this algebraic statement into a testable prediction about the relation between risk and expected return by identifying a portfolio that must be efficient if asset prices are to clear the market of all assets.

Sharpe (1964) and Lintner (1965) add two key assumptions to the Markowitz model to identify a portfolio that must be mean-variance-efficient. The first assumption is *complete agreement*: given market clearing asset prices at t - 1, investors agree on the joint distribution of asset returns from t - 1 to t. And this distribution is the true one—that is, it is the distribution from which the returns we use to test the model are drawn. The second assumption is that there is *borrowing and lending at a risk-free rate*, which is the same for all investors and does not depend on the amount borrowed or lent.

Figure 1 describes portfolio opportunities and tells the CAPM story. The horizontal axis shows portfolio risk, measured by the standard deviation of portfolio return; the vertical axis shows expected return. The curve *abc*, which is called the minimum variance frontier, traces combinations of expected return and risk for portfolios of risky assets that minimize return variance at different levels of expected return. (These portfolios do not include risk-free borrowing and lending.) The tradeoff between risk and expected return for minimum variance portfolios is apparent. For example, an investor who wants a high expected return, perhaps at point a, must accept high volatility. At point T, the investor can have an interme-

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diate expected return with lower volatility. If there is no risk-free borrowing or lending, only portfolios above b along abc are mean-variance-efficient, since these portfolios also maximize expected return, given their return variances.

Adding risk-free borrowing and lending turns the efficient set into a straight line. Consider a portfolio that invests the proportion x of portfolio funds in a risk-free security and 1 - x in some portfolio g. If all funds are invested in the risk-free security—that is, they are loaned at the risk-free rate of interest—the result is the point R_f in Figure 1, a portfolio with zero variance and a risk-free rate of return. Combinations of risk-free lending and positive investment in g plot on the straight line between R_f and g. Points to the right of g on the line represent borrowing at the risk-free rate, with the proceeds from the borrowing used to increase investment in portfolio g. In short, portfolios that combine risk-free lending or borrowing with some risky portfolio g plot along a straight line from R_f through g in Figure 1.²

² Formally, the return, expected return and standard deviation of return on portfolios of the risk-free asset f and a risky portfolio g vary with x, the proportion of portfolio funds invested in f, as

$$R_p = xR_f + (1 - x)R_g,$$
$$E(R_p) = xR_f + (1 - x)E(R_g),$$
$$\sigma(R_p) = (1 - x)\sigma(R_g), x \le 1.0,$$

which together imply that the portfolios plot along the line from R_f through g in Figure 1.

To obtain the mean-variance-efficient portfolios available with risk-free borrowing and lending, one swings a line from R_f in Figure 1 up and to the left as far as possible, to the tangency portfolio T. We can then see that all efficient portfolios are combinations of the risk-free asset (either risk-free borrowing or lending) and a single risky tangency portfolio, T. This key result is Tobin's (1958) "separation theorem."

The punch line of the CAPM is now straightforward. With complete agreement about distributions of returns, all investors see the same opportunity set (Figure 1), and they combine the same risky tangency portfolio T with risk-free lending or borrowing. Since all investors hold the same portfolio T of risky assets, it must be the value-weight market portfolio of risky assets. Specifically, each risky asset's weight in the tangency portfolio, which we now call M (for the "market"), must be the total market value of all outstanding units of the asset divided by the total market value of all risky assets. In addition, the risk-free rate must be set (along with the prices of risky assets) to clear the market for risk-free borrowing and lending.

In short, the CAPM assumptions imply that the market portfolio M must be on the minimum variance frontier if the asset market is to clear. This means that the algebraic relation that holds for any minimum variance portfolio must hold for the market portfolio. Specifically, if there are N risky assets,

(Minimum Variance Condition for M) $E(R_i) = E(R_{ZM})$

+
$$[E(R_M) - E(R_{ZM})]\beta_{iM}, i = 1, ..., N.$$

In this equation, $E(R_i)$ is the expected return on asset *i*, and β_{iM} , the market beta of asset *i*, is the covariance of its return with the market return divided by the variance of the market return,

(Market Beta)
$$\beta_{iM} = \frac{\operatorname{cov}(R_i, R_M)}{\sigma^2(R_M)}.$$

The first term on the right-hand side of the minimum variance condition, $E(R_{ZM})$, is the expected return on assets that have market betas equal to zero, which means their returns are uncorrelated with the market return. The second term is a risk premium—the market beta of asset *i*, β_{iM} , times the premium per unit of beta, which is the expected market return, $E(R_M)$, minus $E(R_{ZM})$.

Since the market beta of asset *i* is also the slope in the regression of its return on the market return, a common (and correct) interpretation of beta is that it measures the sensitivity of the asset's return to variation in the market return. But there is another interpretation of beta more in line with the spirit of the portfolio model that underlies the CAPM. The risk of the market portfolio, as measured by the variance of its return (the denominator of β_{iM}), is a weighted average of the covariance risks of the assets in M (the numerators of β_{iM} for different assets). Thus, β_{iM} is the covariance risk of asset *i* in *M* measured relative to the average covariance risk of assets, which is just the variance of the market return.³ In economic terms, β_{iM} is proportional to the risk each dollar invested in asset *i* contributes to the market portfolio.

The last step in the development of the Sharpe-Lintner model is to use the assumption of risk-free borrowing and lending to nail down $E(R_{ZM})$, the expected return on zero-beta assets. A risky asset's return is uncorrelated with the market return—its beta is zero—when the average of the asset's covariances with the returns on other assets just offsets the variance of the asset's return. Such a risky asset is riskless in the market portfolio in the sense that it contributes nothing to the variance of the market return.

When there is risk-free borrowing and lending, the expected return on assets that are uncorrelated with the market return, $E(R_{ZM})$, must equal the risk-free rate, R_f . The relation between expected return and beta then becomes the familiar Sharpe-Lintner CAPM equation,

(Sharpe-Lintner CAPM) $E(R_i) = R_f + [E(R_M) - R_f)]\beta_{iM}, i = 1, \dots, N.$

In words, the expected return on any asset *i* is the risk-free interest rate, R_f , plus a risk premium, which is the asset's market beta, β_{iM} , times the premium per unit of beta risk, $E(R_M) - R_f$.

Unrestricted risk-free borrowing and lending is an unrealistic assumption. Fischer Black (1972) develops a version of the CAPM without risk-free borrowing or lending. He shows that the CAPM's key result—that the market portfolio is mean-variance-efficient—can be obtained by instead allowing unrestricted short sales of risky assets. In brief, back in Figure 1, if there is no risk-free asset, investors select portfolios from along the mean-variance-efficient frontier from a to b. Market clearing prices imply that when one weights the efficient portfolios chosen by investors by their (positive) shares of aggregate invested wealth, the resulting portfolio is the market portfolio. The market portfolio is thus a portfolio of the efficient portfolios made up of efficient portfolios are themselves efficient. Thus, the market portfolio is efficient, which means that the minimum variance condition for M given above holds, and it is the expected return-risk relation of the Black CAPM.

The relations between expected return and market beta of the Black and Sharpe-Lintner versions of the CAPM differ only in terms of what each says about $E(R_{ZM})$, the expected return on assets uncorrelated with the market. The Black version says only that $E(R_{ZM})$ must be less than the expected market return, so the

³ Formally, if x_{iM} is the weight of asset *i* in the market portfolio, then the variance of the portfolio's return is

$$r^{2}(R_{M}) = Cov(R_{M}, R_{M}) = Cov\left(\sum_{i=1}^{N} x_{iM}R_{i}, R_{M}\right) = \sum_{i=1}^{N} x_{iM}Cov(R_{i}, R_{M}).$$

premium for beta is positive. In contrast, in the Sharpe-Lintner version of the model, $E(R_{ZM})$ must be the risk-free interest rate, R_f , and the premium per unit of beta risk is $E(R_M) - R_f$.

The assumption that short selling is unrestricted is as unrealistic as unrestricted risk-free borrowing and lending. If there is no risk-free asset and short sales of risky assets are not allowed, mean-variance investors still choose efficient portfolios—points above b on the *abc* curve in Figure 1. But when there is no short selling of risky assets and no risk-free asset, the algebra of portfolio efficiency says that portfolios made up of efficient portfolios are not typically efficient. This means that the market portfolio, which is a portfolio of the efficient portfolios chosen by investors, is not typically efficient. And the CAPM relation between expected return and market beta is lost. This does not rule out predictions about expected return and betas with respect to other efficient portfolios—if theory can specify portfolios that must be efficient if the market is to clear. But so far this has proven impossible.

In short, the familiar CAPM equation relating expected asset returns to their market betas is just an application to the market portfolio of the relation between expected return and portfolio beta that holds in any mean-variance-efficient portfolio. The efficiency of the market portfolio is based on many unrealistic assumptions, including complete agreement and either unrestricted risk-free borrowing and lending or unrestricted short selling of risky assets. But all interesting models involve unrealistic simplifications, which is why they must be tested against data.

Early Empirical Tests

Tests of the CAPM are based on three implications of the relation between expected return and market beta implied by the model. First, expected returns on all assets are linearly related to their betas, and no other variable has marginal explanatory power. Second, the beta premium is positive, meaning that the expected return on the market portfolio exceeds the expected return on assets whose returns are uncorrelated with the market return. Third, in the Sharpe-Lintner version of the model, assets uncorrelated with the market have expected returns equal to the risk-free interest rate, and the beta premium is the expected market return minus the risk-free rate. Most tests of these predictions use either crosssection or time-series regressions. Both approaches date to early tests of the model.

Tests on Risk Premiums

The early cross-section regression tests focus on the Sharpe-Lintner model's predictions about the intercept and slope in the relation between expected return and market beta. The approach is to regress a cross-section of average asset returns on estimates of asset betas. The model predicts that the intercept in these regressions is the risk-free interest rate, R_f , and the coefficient on beta is the expected return on the market in excess of the risk-free rate, $E(R_M) - R_f$.

Two problems in these tests quickly became apparent. First, estimates of beta

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for individual assets are imprecise, creating a measurement error problem when they are used to explain average returns. Second, the regression residuals have common sources of variation, such as industry effects in average returns. Positive correlation in the residuals produces downward bias in the usual ordinary least squares estimates of the standard errors of the cross-section regression slopes.

To improve the precision of estimated betas, researchers such as Blume (1970), Friend and Blume (1970) and Black, Jensen and Scholes (1972) work with portfolios, rather than individual securities. Since expected returns and market betas combine in the same way in portfolios, if the CAPM explains security returns it also explains portfolio returns.⁴ Estimates of beta for diversified portfolios are more precise than estimates for individual securities. Thus, using portfolios in cross-section regressions of average returns on betas reduces the critical errors in variables problem. Grouping, however, shrinks the range of betas and reduces statistical power. To mitigate this problem, researchers sort securities on beta when forming portfolios; the first portfolio contains securities with the lowest betas, and so on, up to the last portfolio with the highest beta assets. This sorting procedure is now standard in empirical tests.

Fama and MacBeth (1973) propose a method for addressing the inference problem caused by correlation of the residuals in cross-section regressions. Instead of estimating a single cross-section regression of average monthly returns on betas, they estimate month-by-month cross-section regressions of monthly returns on betas. The times-series means of the monthly slopes and intercepts, along with the standard errors of the means, are then used to test whether the average premium for beta is positive and whether the average return on assets uncorrelated with the market is equal to the average risk-free interest rate. In this approach, the standard errors of the average intercept and slope are determined by the month-to-month variation in the regression coefficients, which fully captures the effects of residual correlation on variation in the regression coefficients, but sidesteps the problem of actually estimating the correlations. The residual correlations are, in effect, captured via repeated sampling of the regression coefficients. This approach also becomes standard in the literature.

Jensen (1968) was the first to note that the Sharpe-Lintner version of the

⁴ Formally, if x_{ip} , i = 1, ..., N, are the weights for assets in some portfolio p, the expected return and market beta for the portfolio are related to the expected returns and betas of assets as

$$E(R_p) = \sum_{i=1}^N x_{ip} E(R_i)$$
, and $\beta_{pM} = \sum_{i=1}^N x_{ip} \beta_{pM}$.

Thus, the CAPM relation between expected return and beta,

$$E(R_i) = E(R_f) + [E(R_M) - E(R_f)]\beta_{iM},$$

holds when asset i is a portfolio, as well as when i is an individual security.

relation between expected return and market beta also implies a time-series regression test. The Sharpe-Lintner CAPM says that the expected value of an asset's excess return (the asset's return minus the risk-free interest rate, $R_{it} - R_{fl}$) is completely explained by its expected CAPM risk premium (its beta times the expected value of $R_{Mt} - R_{fl}$). This implies that "Jensen's alpha," the intercept term in the time-series regression,

(Time-Series Regression) $R_{it} - R_{ft} = \alpha_i + \beta_{iM}(R_{Mt} - R_{ft}) + \varepsilon_{it}$,

is zero for each asset.

The early tests firmly reject the Sharpe-Lintner version of the CAPM. There is a positive relation between beta and average return, but it is too "flat." Recall that, in cross-section regressions, the Sharpe-Lintner model predicts that the intercept is the risk-free rate and the coefficient on beta is the expected market return in excess of the risk-free rate, $E(R_M) - R_f$ The regressions consistently find that the intercept is greater than the average risk-free rate (typically proxied as the return on a one-month Treasury bill), and the coefficient on beta is less than the average excess market return (proxied as the average return on a portfolio of U.S. common stocks minus the Treasury bill rate). This is true in the early tests, such as Douglas (1968), Black, Jensen and Scholes (1972), Miller and Scholes (1972), Blume and Friend (1973) and Fama and MacBeth (1973), as well as in more recent crosssection regression tests, like Fama and French (1992).

The evidence that the relation between beta and average return is too flat is confirmed in time-series tests, such as Friend and Blume (1970), Black, Jensen and Scholes (1972) and Stambaugh (1982). The intercepts in time-series regressions of excess asset returns on the excess market return are positive for assets with low betas and negative for assets with high betas.

Figure 2 provides an updated example of the evidence. In December of each year, we estimate a preranking beta for every NYSE (1928–2003), AMEX (1963–2003) and NASDAQ (1972–2003) stock in the CRSP (Center for Research in Security Prices of the University of Chicago) database, using two to five years (as available) of prior monthly returns.⁵ We then form ten value-weight portfolios based on these preranking betas and compute their returns for the next twelve months. We repeat this process for each year from 1928 to 2003. The result is 912 monthly returns on ten beta-sorted portfolios. Figure 2 plots each portfolio's average return against its postranking beta, estimated by regressing its monthly returns for 1928–2003 on the return on the CRSP value-weight portfolio of U.S. common stocks.

The Sharpe-Lintner CAPM predicts that the portfolios plot along a straight

⁵ To be included in the sample for year t, a security must have market equity data (price times shares outstanding) for December of t - 1, and CRSP must classify it as ordinary common equity. Thus, we exclude securities such as American Depository Receipts (ADRs) and Real Estate Investment Trusts (REITs).

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Figure 2

Average Annualized Monthly Return versus Beta for Value Weight Portfolios Formed on Prior Beta, 1928–2003



line, with an intercept equal to the risk-free rate, R_f , and a slope equal to the expected excess return on the market, $E(R_M) - R_f$. We use the average one-month Treasury bill rate and the average excess CRSP market return for 1928–2003 to estimate the predicted line in Figure 2. Confirming earlier evidence, the relation between beta and average return for the ten portfolios is much flatter than the Sharpe-Lintner CAPM predicts. The returns on the low beta portfolios are too high, and the returns on the high beta portfolios are too low. For example, the predicted return on the portfolio with the lowest beta is 8.3 percent per year; the actual return is 11.1 percent. The predicted return on the portfolio with the highest beta is 16.8 percent per year; the actual is 13.7 percent.

Although the observed premium per unit of beta is lower than the Sharpe-Lintner model predicts, the relation between average return and beta in Figure 2 is roughly linear. This is consistent with the Black version of the CAPM, which predicts only that the beta premium is positive. Even this less restrictive model, however, eventually succumbs to the data.

Testing Whether Market Betas Explain Expected Returns

The Sharpe-Lintner and Black versions of the CAPM share the prediction that the market portfolio is mean-variance-efficient. This implies that differences in expected return across securities and portfolios are entirely explained by differences in market beta; other variables should add nothing to the explanation of expected return. This prediction plays a prominent role in tests of the CAPM. In the early work, the weapon of choice is cross-section regressions.

In the framework of Fama and MacBeth (1973), one simply adds predetermined explanatory variables to the month-by-month cross-section regressions of

returns on beta. If all differences in expected return are explained by beta, the average slopes on the additional variables should not be reliably different from zero. Clearly, the trick in the cross-section regression approach is to choose specific additional variables likely to expose any problems of the CAPM prediction that, because the market portfolio is efficient, market betas suffice to explain expected asset returns.

For example, in Fama and MacBeth (1973) the additional variables are squared market betas (to test the prediction that the relation between expected return and beta is linear) and residual variances from regressions of returns on the market return (to test the prediction that market beta is the only measure of risk needed to explain expected returns). These variables do not add to the explanation of average returns provided by beta. Thus, the results of Fama and MacBeth (1973) are consistent with the hypothesis that their market proxy—an equal-weight portfolio of NYSE stocks—is on the minimum variance frontier.

The hypothesis that market betas completely explain expected returns can also be tested using time-series regressions. In the time-series regression described above (the excess return on asset *i* regressed on the excess market return), the intercept is the difference between the asset's average excess return and the excess return predicted by the Sharpe-Lintner model, that is, beta times the average excess market return. If the model holds, there is no way to group assets into portfolios whose intercepts are reliably different from zero. For example, the intercepts for a portfolio of stocks with high ratios of earnings to price and a portfolio of stocks with low earning-price ratios should both be zero. Thus, to test the hypothesis that market betas suffice to explain expected returns, one estimates the time-series regression for a set of assets (or portfolios) and then jointly tests the vector of regression intercepts against zero. The trick in this approach is to choose the left-hand-side assets (or portfolios) in a way likely to expose any shortcoming of the CAPM prediction that market betas suffice to explain expected asset returns.

In early applications, researchers use a variety of tests to determine whether the intercepts in a set of time-series regressions are all zero. The tests have the same asymptotic properties, but there is controversy about which has the best small sample properties. Gibbons, Ross and Shanken (1989) settle the debate by providing an F-test on the intercepts that has exact small-sample properties. They also show that the test has a simple economic interpretation. In effect, the test constructs a candidate for the tangency portfolio T in Figure 1 by optimally combining the market proxy and the left-hand-side assets of the time-series regressions. The estimator then tests whether the efficient set provided by the combination of this tangency portfolio and the risk-free asset is reliably superior to the one obtained by combining the risk-free asset with the market proxy alone. In other words, the Gibbons, Ross and Shanken statistic tests whether the market proxy is the tangency portfolio in the set of portfolios that can be constructed by combining the market portfolio with the specific assets used as dependent variables in the time-series regressions.

Enlightened by this insight of Gibbons, Ross and Shanken (1989), one can see

a similar interpretation of the cross-section regression test of whether market betas suffice to explain expected returns. In this case, the test is whether the additional explanatory variables in a cross-section regression identify patterns in the returns on the left-hand-side assets that are not explained by the assets' market betas. This amounts to testing whether the market proxy is on the minimum variance frontier that can be constructed using the market proxy and the left-hand-side assets included in the tests.

An important lesson from this discussion is that time-series and cross-section regressions do not, strictly speaking, test the CAPM. What is literally tested is whether a specific proxy for the market portfolio (typically a portfolio of U.S. common stocks) is efficient in the set of portfolios that can be constructed from it and the left-hand-side assets used in the test. One might conclude from this that the CAPM has never been tested, and prospects for testing it are not good because 1) the set of left-hand-side assets does not include all marketable assets, and 2) data for the true market portfolio of all assets are likely beyond reach (Roll, 1977; more on this later). But this criticism can be leveled at tests of any economic model when the tests are less than exhaustive or when they use proxies for the variables called for by the model.

The bottom line from the early cross-section regression tests of the CAPM, such as Fama and MacBeth (1973), and the early time-series regression tests, like Gibbons (1982) and Stambaugh (1982), is that standard market proxies seem to be on the minimum variance frontier. That is, the central predictions of the Black version of the CAPM, that market betas suffice to explain expected returns and that the risk premium for beta is positive, seem to hold. But the more specific prediction of the Sharpe-Lintner CAPM that the premium per unit of beta is the expected market return minus the risk-free interest rate is consistently rejected.

The success of the Black version of the CAPM in early tests produced a consensus that the model is a good description of expected returns. These early results, coupled with the model's simplicity and intuitive appeal, pushed the CAPM to the forefront of finance.

Recent Tests

Starting in the late 1970s, empirical work appears that challenges even the Black version of the CAPM. Specifically, evidence mounts that much of the variation in expected return is unrelated to market beta.

The first blow is Basu's (1977) evidence that when common stocks are sorted on earnings-price ratios, future returns on high E/P stocks are higher than predicted by the CAPM. Banz (1981) documents a size effect: when stocks are sorted on market capitalization (price times shares outstanding), average returns on small stocks are higher than predicted by the CAPM. Bhandari (1988) finds that high debt-equity ratios (book value of debt over the market value of equity, a measure of leverage) are associated with returns that are too high relative to their market betas.

Finally, Statman (1980) and Rosenberg, Reid and Lanstein (1985) document that stocks with high book-to-market equity ratios (B/M, the ratio of the book value of a common stock to its market value) have high average returns that are not captured by their betas.

There is a theme in the contradictions of the CAPM summarized above. Ratios involving stock prices have information about expected returns missed by market betas. On reflection, this is not surprising. A stock's price depends not only on the expected cash flows it will provide, but also on the expected returns that discount expected cash flows back to the present. Thus, in principle, the cross-section of prices has information about the cross-section of expected returns. (A high expected return implies a high discount rate and a low price.) The cross-section of stock prices is, however, arbitrarily affected by differences in scale (or units). But with a judicious choice of scaling variable X, the ratio X/P can reveal differences in the cross-section of expected stock returns. Such ratios are thus prime candidates to expose shortcomings of asset pricing models—in the case of the CAPM, shortcomings of the prediction that market betas suffice to explain expected returns (Ball, 1978). The contradictions of the CAPM summarized above suggest that earnings-price, debt-equity and book-to-market ratios indeed play this role.

Fama and French (1992) update and synthesize the evidence on the empirical failures of the CAPM. Using the cross-section regression approach, they confirm that size, earnings-price, debt-equity and book-to-market ratios add to the explanation of expected stock returns provided by market beta. Fama and French (1996) reach the same conclusion using the time-series regression approach applied to portfolios of stocks sorted on price ratios. They also find that different price ratios have much the same information about expected returns. This is not surprising given that price is the common driving force in the price ratios, and the numerators are just scaling variables used to extract the information in price about expected returns.

Fama and French (1992) also confirm the evidence (Reinganum, 1981; Stambaugh, 1982; Lakonishok and Shapiro, 1986) that the relation between average return and beta for common stocks is even flatter after the sample periods used in the early empirical work on the CAPM. The estimate of the beta premium is, however, clouded by statistical uncertainty (a large standard error). Kothari, Shanken and Sloan (1995) try to resuscitate the Sharpe-Lintner CAPM by arguing that the weak relation between average return and beta is just a chance result. But the strong evidence that other variables capture variation in expected return missed by beta makes this argument irrelevant. If betas do not suffice to explain expected returns, the market portfolio is not efficient, and the CAPM is dead in its tracks. Evidence on the size of the market premium can neither save the model nor further doom it.

The synthesis of the evidence on the empirical problems of the CAPM provided by Fama and French (1992) serves as a catalyst, marking the point when it is generally acknowledged that the CAPM has potentially fatal problems. Research then turns to explanations.

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One possibility is that the CAPM's problems are spurious, the result of data dredging—publication-hungry researchers scouring the data and unearthing contradictions that occur in specific samples as a result of chance. A standard response to this concern is to test for similar findings in other samples. Chan, Hamao and Lakonishok (1991) find a strong relation between book-to-market equity (B/M) and average return for Japanese stocks. Capaul, Rowley and Sharpe (1993) observe a similar B/M effect in four European stock markets and in Japan. Fama and French (1998) find that the price ratios that produce problems for the CAPM in U.S. data show up in the same way in the stock returns of twelve non-U.S. major markets, and they are present in emerging market returns. This evidence suggests that the contradictions of the CAPM associated with price ratios are not sample specific.

Explanations: Irrational Pricing or Risk

Among those who conclude that the empirical failures of the CAPM are fatal, two stories emerge. On one side are the behavioralists. Their view is based on evidence that stocks with high ratios of book value to market price are typically firms that have fallen on bad times, while low B/M is associated with growth firms (Lakonishok, Shleifer and Vishny, 1994; Fama and French, 1995). The behavioralists argue that sorting firms on book-to-market ratios exposes investor overreaction to good and bad times. Investors overextrapolate past performance, resulting in stock prices that are too high for growth (low B/M) firms and too low for distressed (high B/M, so-called value) firms. When the overreaction is eventually corrected, the result is high returns for value stocks and low returns for growth stocks. Proponents of this view include DeBondt and Thaler (1987), Lakonishok, Shleifer and Vishny (1994) and Haugen (1995).

The second story for explaining the empirical contradictions of the CAPM is that they point to the need for a more complicated asset pricing model. The CAPM is based on many unrealistic assumptions. For example, the assumption that investors care only about the mean and variance of one-period portfolio returns is extreme. It is reasonable that investors also care about how their portfolio return covaries with labor income and future investment opportunities, so a portfolio's return variance misses important dimensions of risk. If so, market beta is not a complete description of an asset's risk, and we should not be surprised to find that differences in expected return are not completely explained by differences in beta. In this view, the search should turn to asset pricing models that do a better job explaining average returns.

Merton's (1973) intertemporal capital asset pricing model (ICAPM) is a natural extension of the CAPM. The ICAPM begins with a different assumption about investor objectives. In the CAPM, investors care only about the wealth their portfolio produces at the end of the current period. In the ICAPM, investors are concerned not only with their end-of-period payoff, but also with the opportunities

they will have to consume or invest the payoff. Thus, when choosing a portfolio at time t - 1, ICAPM investors consider how their wealth at t might vary with future *state variables*, including labor income, the prices of consumption goods and the nature of portfolio opportunities at t, and expectations about the labor income, consumption and investment opportunities to be available after t.

Like CAPM investors, ICAPM investors prefer high expected return and low return variance. But ICAPM investors are also concerned with the covariances of portfolio returns with state variables. As a result, optimal portfolios are "multifactor efficient," which means they have the largest possible expected returns, given their return variances and the covariances of their returns with the relevant state variables.

Fama (1996) shows that the ICAPM generalizes the logic of the CAPM. That is, if there is risk-free borrowing and lending or if short sales of risky assets are allowed, market clearing prices imply that the market portfolio is multifactor efficient. Moreover, multifactor efficiency implies a relation between expected return and beta risks, but it requires additional betas, along with a market beta, to explain expected returns.

An ideal implementation of the ICAPM would specify the state variables that affect expected returns. Fama and French (1993) take a more indirect approach, perhaps more in the spirit of Ross's (1976) arbitrage pricing theory. They argue that though size and book-to-market equity are not themselves state variables, the higher average returns on small stocks and high book-to-market stocks reflect unidentified state variables that produce undiversifiable risks (covariances) in returns that are not captured by the market return and are priced separately from market betas. In support of this claim, they show that the returns on the stocks of small firms covary more with one another than with returns on the stocks of large firms, and returns on high book-to-market (value) stocks covary more with one another than with returns on low book-to-market (growth) stocks. Fama and French (1995) show that there are similar size and book-to-market patterns in the covariation of fundamentals like earnings and sales.

Based on this evidence, Fama and French (1993, 1996) propose a three-factor model for expected returns,

(Three-Factor Model) $E(R_{it}) - R_{ft} = \beta_{iM}[E(R_{Mt}) - R_{ft}]$

 $+ \beta_{is} E(SMB_t) + \beta_{ih} E(HML_t).$

In this equation, SMB_t (small minus big) is the difference between the returns on diversified portfolios of small and big stocks, HML_t (high minus low) is the difference between the returns on diversified portfolios of high and low B/M stocks, and the betas are slopes in the multiple regression of $R_{it} - R_{ft}$ on $R_{Mt} - R_{ft}$, SMB_t and HML_t .

For perspective, the average value of the market premium $R_{Mt} - R_{ft}$ for 1927–2003 is 8.3 percent per year, which is 3.5 standard errors from zero. The

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average values of SMB_t , and HML_t are 3.6 percent and 5.0 percent per year, and they are 2.1 and 3.1 standard errors from zero. All three premiums are volatile, with annual standard deviations of 21.0 percent $(R_{Mt} - R_{ft})$, 14.6 percent (SMB_t) and 14.2 percent (HML_t) per year. Although the average values of the premiums are large, high volatility implies substantial uncertainty about the true expected premiums.

One implication of the expected return equation of the three-factor model is that the intercept α_i in the time-series regression,

$$R_{it} - R_{ft} = \alpha_i + \beta_{iM}(R_{Mt} - R_{ft}) + \beta_{is}SM\beta_t + \beta_{ih}HML_t + \varepsilon_{it},$$

is zero for all assets i. Using this criterion, Fama and French (1993, 1996) find that the model captures much of the variation in average return for portfolios formed on size, book-to-market equity and other price ratios that cause problems for the CAPM. Fama and French (1998) show that an international version of the model performs better than an international CAPM in describing average returns on portfolios formed on scaled price variables for stocks in 13 major markets.

The three-factor model is now widely used in empirical research that requires a model of expected returns. Estimates of α_i from the time-series regression above are used to calibrate how rapidly stock prices respond to new information (for example, Loughran and Ritter, 1995; Mitchell and Stafford, 2000). They are also used to measure the special information of portfolio managers, for example, in Carhart's (1997) study of mutual fund performance. Among practitioners like Ibbotson Associates, the model is offered as an alternative to the CAPM for estimating the cost of equity capital.

From a theoretical perspective, the main shortcoming of the three-factor model is its empirical motivation. The small-minus-big (SMB) and high-minus-low (HML) explanatory returns are not motivated by predictions about state variables of concern to investors. Instead they are brute force constructs meant to capture the patterns uncovered by previous work on how average stock returns vary with size and the book-to-market equity ratio.

But this concern is not fatal. The ICAPM does not require that the additional portfolios used along with the market portfolio to explain expected returns "mimic" the relevant state variables. In both the ICAPM and the arbitrage pricing theory, it suffices that the additional portfolios are well diversified (in the terminology of Fama, 1996, they are multifactor minimum variance) and that they are sufficiently different from the market portfolio to capture covariation in returns and variation in expected returns missed by the market portfolio. Thus, adding diversified portfolios that capture covariation in returns and variation in average returns left unexplained by the market is in the spirit of both the ICAPM and the Ross's arbitrage pricing theory.

The behavioralists are not impressed by the evidence for a risk-based explanation of the failures of the CAPM. They typically concede that the three-factor model captures covariation in returns missed by the market return and that it picks

up much of the size and value effects in average returns left unexplained by the CAPM. But their view is that the average return premium associated with the model's book-to-market factor—which does the heavy lifting in the improvements to the CAPM—is itself the result of investor overreaction that happens to be correlated across firms in a way that just looks like a risk story. In short, in the behavioral view, the market tries to set CAPM prices, and violations of the CAPM are due to mispricing.

The conflict between the behavioral irrational pricing story and the rational risk story for the empirical failures of the CAPM leaves us at a timeworn impasse. Fama (1970) emphasizes that the hypothesis that prices properly reflect available information must be tested in the context of a model of expected returns, like the CAPM. Intuitively, to test whether prices are rational, one must take a stand on what the market is trying to do in setting prices—that is, what is risk and what is the relation between expected return and risk? When tests reject the CAPM, one cannot say whether the problem is its assumption that prices are rational (the behavioral view) or violations of other assumptions that are also necessary to produce the CAPM (our position).

Fortunately, for some applications, the way one uses the three-factor model does not depend on one's view about whether its average return premiums are the rational result of underlying state variable risks, the result of irrational investor behavior or sample specific results of chance. For example, when measuring the response of stock prices to new information or when evaluating the performance of managed portfolios, one wants to account for known patterns in returns and average returns for the period examined, whatever their source. Similarly, when estimating the cost of equity capital, one might be unconcerned with whether expected return premiums are rational or irrational since they are in either case part of the opportunity cost of equity capital (Stein, 1996). But the cost of capital is forward looking, so if the premiums are sample specific they are irrelevant.

The three-factor model is hardly a panacea. Its most serious problem is the momentum effect of Jegadeesh and Titman (1993). Stocks that do well relative to the market over the last three to twelve months tend to continue to do well for the next few months, and stocks that do poorly continue to do poorly. This momentum effect is distinct from the value effect captured by book-to-market equity and other price ratios. Moreover, the momentum effect is left unexplained by the three-factor model, as well as by the CAPM. Following Carhart (1997), one response is to add a momentum factor (the difference between the returns on diversified portfolios of short-term winners and losers) to the three-factor model. This step is again legitimate in applications where the goal is to abstract from known patterns in average returns to uncover information-specific or manager-specific effects. But since the momentum effect is short-lived, it is largely irrelevant for estimates of the cost of equity capital.

Another strand of research points to problems in both the three-factor model and the CAPM. Frankel and Lee (1998), Dechow, Hutton and Sloan (1999), Piotroski (2000) and others show that in portfolios formed on price ratios like book-to-market equity, stocks with higher expected cash flows have higher average returns that are not captured by the three-factor model or the CAPM. The authors interpret their results as evidence that stock prices are irrational, in the sense that they do not reflect available information about expected profitability.

In truth, however, one can't tell whether the problem is bad pricing or a bad asset pricing model. A stock's price can always be expressed as the present value of expected future cash flows discounted at the expected return on the stock (Campbell and Shiller, 1989; Vuolteenaho, 2002). It follows that if two stocks have the same price, the one with higher expected cash flows must have a higher expected return. This holds true whether pricing is rational or irrational. Thus, when one observes a positive relation between expected cash flows and expected returns that is left unexplained by the CAPM or the three-factor model, one can't tell whether it is the result of irrational pricing or a misspecified asset pricing model.

The Market Proxy Problem

Roll (1977) argues that the CAPM has never been tested and probably never will be. The problem is that the market portfolio at the heart of the model is theoretically and empirically elusive. It is not theoretically clear which assets (for example, human capital) can legitimately be excluded from the market portfolio, and data availability substantially limits the assets that are included. As a result, tests of the CAPM are forced to use proxies for the market portfolio, in effect testing whether the proxies are on the minimum variance frontier. Roll argues that because the tests use proxies, not the true market portfolio, we learn nothing about the CAPM.

We are more pragmatic. The relation between expected return and market beta of the CAPM is just the minimum variance condition that holds in any efficient portfolio, applied to the market portfolio. Thus, if we can find a market proxy that is on the minimum variance frontier, it can be used to describe differences in expected returns, and we would be happy to use it for this purpose. The strong rejections of the CAPM described above, however, say that researchers have not uncovered a reasonable market proxy that is close to the minimum variance frontier. If researchers are constrained to reasonable proxies, we doubt they ever will.

Our pessimism is fueled by several empirical results. Stambaugh (1982) tests the CAPM using a range of market portfolios that include, in addition to U.S. common stocks, corporate and government bonds, preferred stocks, real estate and other consumer durables. He finds that tests of the CAPM are not sensitive to expanding the market proxy beyond common stocks, basically because the volatility of expanded market returns is dominated by the volatility of stock returns.

One need not be convinced by Stambaugh's (1982) results since his market proxies are limited to U.S. assets. If international capital markets are open and asset prices conform to an international version of the CAPM, the market portfolio

should include international assets. Fama and French (1998) find, however, that betas for a global stock market portfolio cannot explain the high average returns observed around the world on stocks with high book-to-market or high earnings-price ratios.

A major problem for the CAPM is that portfolios formed by sorting stocks on price ratios produce a wide range of average returns, but the average returns are not positively related to market betas (Lakonishok, Shleifer and Vishny, 1994; Fama and French, 1996, 1998). The problem is illustrated in Figure 3, which shows average returns and betas (calculated with respect to the CRSP value-weight portfolio of NYSE, AMEX and NASDAQ stocks) for July 1963 to December 2003 for ten portfolios of U.S. stocks formed annually on sorted values of the book-to-market equity ratio (B/M).⁶

Average returns on the B/M portfolios increase almost monotonically, from 10.1 percent per year for the lowest B/M group (portfolio 1) to an impressive 16.7 percent for the highest (portfolio 10). But the positive relation between beta and average return predicted by the CAPM is notably absent. For example, the portfolio with the lowest book-to-market ratio has the highest beta but the lowest average return. The estimated beta for the portfolio with the highest book-tomarket ratio and the highest average return is only 0.98. With an average annualized value of the riskfree interest rate, R_f , of 5.8 percent and an average annualized market premium, $R_M - R_f$, of 11.3 percent, the Sharpe-Lintner CAPM predicts an average return of 11.8 percent for the lowest B/M portfolio and 11.2 percent for the highest, far from the observed values, 10.1 and 16.7 percent. For the Sharpe-Lintner model to "work" on these portfolios, their market betas must change dramatically, from 1.09 to 0.78 for the lowest B/M portfolio and from 0.98 to 1.98 for the highest. We judge it unlikely that alternative proxies for the market portfolio will produce betas and a market premium that can explain the average returns on these portfolios.

It is always possible that researchers will redeem the CAPM by finding a reasonable proxy for the market portfolio that is on the minimum variance frontier. We emphasize, however, that this possibility cannot be used to justify the way the CAPM is currently applied. The problem is that applications typically use the same

⁶ Stock return data are from CRSP, and book equity data are from Compustat and the Moody's Industrials, Transportation, Utilities and Financials manuals. Stocks are allocated to ten portfolios at the end of June of each year t (1963 to 2003) using the ratio of book equity for the fiscal year ending in calendar year t - 1, divided by market equity at the end of December of t - 1. Book equity is the book value of stockholders' equity, plus balance sheet deferred taxes and investment tax credit (if available), minus the book value of preferred stock. Depending on availability, we use the redemption, liquidation or par value (in that order) to estimate the book value of preferred stock. Stockholders' equity as the book value of common equity plus the par value of preferred stock or the book value of assets minus total liabilities (in that order). The portfolios for year t include NYSE (1963–2003), AMEX (1963–2003) and NASDAQ (1972–2003) stocks with positive book equity in t - 1 and market equity (from CRSP) for December of t - 1 and June of t. The portfolios exclude securities CRSP does not classify as ordinary common equity. The breakpoints for year t use only securities that are on the NYSE in June of year t.

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Figure 3

Average Annualized Monthly Return versus Beta for Value Weight Portfolios Formed on B/M, 1963–2003



market proxies, like the value-weight portfolio of U.S. stocks, that lead to rejections of the model in empirical tests. The contradictions of the CAPM observed when such proxies are used in tests of the model show up as bad estimates of expected returns in applications; for example, estimates of the cost of equity capital that are too low (relative to historical average returns) for small stocks and for stocks with high book-to-market equity ratios. In short, if a market proxy does not work in tests of the CAPM, it does not work in applications.

Conclusions

The version of the CAPM developed by Sharpe (1964) and Lintner (1965) has never been an empirical success. In the early empirical work, the Black (1972) version of the model, which can accommodate a flatter tradeoff of average return for market beta, has some success. But in the late 1970s, research begins to uncover variables like size, various price ratios and momentum that add to the explanation of average returns provided by beta. The problems are serious enough to invalidate most applications of the CAPM.

For example, finance textbooks often recommend using the Sharpe-Lintner CAPM risk-return relation to estimate the cost of equity capital. The prescription is to estimate a stock's market beta and combine it with the risk-free interest rate and the average market risk premium to produce an estimate of the cost of equity. The typical market portfolio in these exercises includes just U.S. common stocks. But empirical work, old and new, tells us that the relation between beta and average return is flatter than predicted by the Sharpe-Lintner version of the CAPM. As a

result, CAPM estimates of the cost of equity for high beta stocks are too high (relative to historical average returns) and estimates for low beta stocks are too low (Friend and Blume, 1970). Similarly, if the high average returns on value stocks (with high book-to-market ratios) imply high expected returns, CAPM cost of equity estimates for such stocks are too low.⁷

The CAPM is also often used to measure the performance of mutual funds and other managed portfolios. The approach, dating to Jensen (1968), is to estimate the CAPM time-series regression for a portfolio and use the intercept (Jensen's alpha) to measure abnormal performance. The problem is that, because of the empirical failings of the CAPM, even passively managed stock portfolios produce abnormal returns if their investment strategies involve tilts toward CAPM problems (Elton, Gruber, Das and Hlavka, 1993). For example, funds that concentrate on low beta stocks, small stocks or value stocks will tend to produce positive abnormal returns relative to the predictions of the Sharpe-Lintner CAPM, even when the fund managers have no special talent for picking winners.

The CAPM, like Markowitz's (1952, 1959) portfolio model on which it is built, is nevertheless a theoretical tour de force. We continue to teach the CAPM as an introduction to the fundamental concepts of portfolio theory and asset pricing, to be built on by more complicated models like Merton's (1973) ICAPM. But we also warn students that despite its seductive simplicity, the CAPM's empirical problems probably invalidate its use in applications.

■ We gratefully acknowledge the comments of John Cochrane, George Constantinides, Richard Leftwich, Andrei Shleifer, René Stulz and Timothy Taylor.

⁷ The problems are compounded by the large standard errors of estimates of the market premium and of betas for individual stocks, which probably suffice to make CAPM estimates of the cost of equity rather meaningless, even if the CAPM holds (Fama and French, 1997; Pastor and Stambaugh, 1999). For example, using the U.S. Treasury bill rate as the risk-free interest rate and the CRSP value-weight portfolio of publicly traded U.S. common stocks, the average value of the equity premium $R_{Ml} - R_{fl}$ for 1927–2003 is 8.3 percent per year, with a standard error of 2.4 percent. The two standard error range thus runs from 3.5 percent to 13.1 percent, which is sufficient to make most projects appear either profitable or unprofitable. This problem is, however, hardly special to the CAPM. For example, expected returns in all versions of Merton's (1973) ICAPM include a market beta and the expected market premium. Also, as noted earlier the expected values of the size and book-to-market premiums in the Fama-French three-factor model are also estimated with substantial error. The Capital Asset Pricing Model: Theory and Evidence 45

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ORIGINAL ARTICLE

New approach to estimating the cost of common equity capital for public utilities

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Published online: 26 August 2011 © Springer Science+Business Media, LLC 2011

Abstract The regulatory process for setting public utilities' allowed rate of return on common equity has generally used the Gordon DCF, CAPM and Risk Premium specifications to estimate the cost of common equity. Despite the widely known problems with these models, there has been little movement to adopt more recently developed asset pricing models to provide additional evidence for estimating the cost of capital. This paper presents, validates empirically and applies a general yet simple consumption-based asset pricing specification to model the risk-return relationship for stocks and estimate the cost of common equity for public utilities. The model is not necessarily superior to other models in its practical results, yet these results do indicate that it should be used to provide additional estimates of the cost of common equity. Additionally, the model raises doubts as to whether assets such as utility stocks are a consumption (business cycle) hedge.

Keywords Public utilities · Cost of capital · GARCH · Consumption asset pricing model

JEL Classification G12 · L94 · L95

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1 Introduction

Following electricity deregulation with the National Energy Policy Act of 1992, the estimation of the cost of common equity capital remains a critical component of the utility rate-of-return regulatory process. Since the cost of common equity is not observable in capital markets, it must be inferred from asset pricing models. The models that are commonly applied in regulatory proceedings are the Gordon (1974) Discounted Cash Flow (DCF), the Capital Asset Pricing (CAPM) and Risk Premium Models. There are other tools used to estimate the cost of common equity such as comparable earnings or earnings-to-price ratios, but they are not asset pricing models. The empirical literature on the CAPM is vast {Fama and French (2004)} and the CAPM is used by a number of US regulatory jurisdictions. The DCF model has not been empirically tested to the same extent as the CAPM, yet it is considered by many US regulatory jurisdictions.

The purpose of this paper is to present, test empirically and apply a recently developed general consumption-based asset pricing model that estimates the risk-return relationship directly from asset pricing data and, when estimated with recently developed time series methods, produces a prediction of the equity risk premium that is driven by its predicted volatility. The predicted risk premium is then added to a riskfree rate of return to provide an estimate of the cost of common equity. We predict two forms of the equity risk premium with the model, the risk premium net of the risk-free rate and the equity-to-debt risk premium (equity risk premium net of the relevant bond yield for the company's stock). Either can be applied to predict the common equity cost of capital for a public utility. Although the model is tested and applied to public utilities for rate of return regulation, it can be used to estimate the cost of capital for any stock. Section 2 reviews the asset pricing models typically used in public utility rate cases and the generalized consumption asset pricing model we propose to estimate the cost of common equity. Section 3 discusses the data and the empirical testing of the consumption asset pricing model. Section 4 reviews the application of the model and compares it with the DCF and CAPM results. Section 5 is the conclusion.

2 DCF, CAPM and consumption asset pricing model

2.1 DCF and CAPM approaches

The standard DCF model frequently used in estimative the cost rate of common equity in regulatory proceedings is defined by the following equation:

$$k = D_0 (1 + g) / P_0 + g,$$

where k is the expected return on common equity; D_0 is the current dividend per share; g is the expected dividend per share growth rate; and P_0 is the current market price.

The DCF was developed by Gordon (1974) specifically for regulatory purposes. Underlying the DCF model is the theory that the present value of an expected future stream of net cash flows during the investment holding period can be determined by discounting those cash flows at the cost of capital, or the investors' capitalization rate. DCF theory indicates that an investor buys a stock for an expected total return rate which is derived from cash flows received in the form of dividends plus appreciation in market price (the expected growth rate) over the investment holding period. Mathematically, the expected dividend yield $(D_0(1 + g)/P_0)$ on market price plus an expected growth rate equals the capitalization rate, i.e., the expected return on common equity.

The standard DCF contains several restrictive assumptions, the most contentious of which during utility cost of capital proceedings is typically that dividends per share (DPS), book value per share (BVPS), earnings per share (EPS) as well as market price grow at the same rate in perpetuity. There is also considerable contention over the proper proxy for g, prospective or historical growth in DPS, BVPS, EPS and market price and over what time period. In addition, although the standard DCF described above is a single stage annual growth model, there is considerable discussion over the use of multiple stage growth models during regulatory proceedings. Some analysts use the discrete version and others use the continuous version of the DCF model. Solving these models for k, the cost of common equity, results in differing equations to solve for k. The equation above is from the discrete version. The continuous version uses the current dividend yield and is not adjusted by g, which results in a lower estimate for k. Because of these and other restrictive assumptions that require numerous subjective judgments in application, it is often difficult for regulatory commissions to reconcile the frequently large disparities in rates of return on common equity recommended by various parties in a public utility rate case.

The CAPM model is defined by the following equation:

$$k=R_f+\beta\left(R_m-R_f\right),$$

where k is the expected return on common equity; R_f is the expected risk-free rate of return; β is the expected beta; and R_m is the expected market return.

CAPM theory defines risk as the co-variability of a security's returns with the market's returns or β , also known as systematic or market risk, with the market beta being defined as 1.0. Because CAPM theory assumes that all investors hold perfectly diversified portfolios, they are presumed to be exposed only to systematic risk and the market (according to the model) will not reward them a risk premium for unsystematic or non-market risk. In other words, the CAPM presumes that investors require compensation only for systematic or market risks which are due to macroeconomic and other events that affect the returns on all assets. Mathematically, the CAPM is applied by adding a forward-looking risk-free rate of return to an expected market equity risk premium adjusted proportionately by the expected beta to reflect the systematic risk.

As with the DCF, there is considerable contention during regulatory cost of capital proceedings as to the proper proxies for all components of the CAPM: the R_f , the R_m , as well as β . In addition, the CAPM assumption that the market will only reward investors for systematic or market risk is extremely restrictive when estimating the expected return on common equity for a single asset such as a single jurisdictional regulated operating utility. Additionally, this assumption requires that the investor have a perfectly diversified portfolio, that is, one with no unsystematic risk. Since

this assumption is not applicable, estimating the cost of common equity capital for a single utility's common equity undoubtedly will not reflect the risk actually faced by the imperfectly diversified investor.

As will be discussed in the next section, our application of the risk premium approach, the consumption asset pricing model and GARCH¹ rest on minimal assumptions and restrictions and therefore requires considerably less judgment in its application.

2.2 Risk premium approach, consumption asset pricing models, and GARCH

A widely used model to estimate the cost of common equity capital for public utilities is the risk premium approach. This approach often estimates the expected rate of return as the long-term historic mean of the realized risk premium above an historic yield plus the current yield of the relevant bond applicable to a specific utility or peer group of utilities. Litigants in public utility rate proceedings debate the choice of inputs to estimate the risk premium as well as how far back to reach into history to collect data for calculating an average that is representative of a forward-looking premium.

It is surprising that, as popular as the risk premium method is in public utility rate cases, the intuitively appealing general consumption-based asset pricing model, with its minimal assumptions and strong theoretical foundation, has not been applied to estimate the cost of common equity capital for public utilities. The model provides projections of the conditional expected risk premium on an asset based on its relation to its predicted conditional volatility. This model generalizes the well known special case asset pricing models such as the Merton (1973) intertemporal capital asset pricing model, Campbell (1993) intertemporal asset pricing model, and the habit-persistence model of Campbell and Cochrane (1999), which are special cases of the general model. The relation of the model to their specialized cases can be found in Cochrane (2006) and Cochrane (2007). The approach of consumption asset pricing models is to make investment decisions that maximize investors' utility from the consumption that they ultimately desire, not returns.

Even if the model is not used to project directly the expected risk premium, it can, at a minimum, be used to verify that the risk premia data chosen for estimating the cost of capital is empirically validated by fitting the model well. The model can be used to predict the equity risk premia net of the risk-free rate (equity risk premium) or to predict the equity-to-debt risk premium for a firm. We perform both of these empirical tests in this paper. The general consumption-based asset pricing model developed in Michelfelder and Pilotte (2011) and based on Cochrane (2004) provides the relationship of the ex ante risk premium to an asset's own volatility in return:

$$E_{t}[R_{i,t+1}] - R_{f,t} = -\frac{vol_{t}[M_{t+1}]}{E_{t}[M_{t+1}]}vol_{t}[R_{i,t+1}]corr_{t}[M_{t+1}, R_{i,t+1}].$$
 (1)

¹ GARCH refers to the generalized autoregressive conditional heteroskedasticity regression model which is discussed below.

where vol_t is the conditional volatility, $corr_t$ is the conditional correlation, and M_{t+1} is the stochastic discount factor (SDF).

The SDF is the intertemporal marginal rate of substitution in consumption, or, $M_{t+1} = \beta \frac{U_{c,t+1}}{U_{c,t}}$, where the U_c 's are the marginal utilities of consumption in the next period, t + 1, and the current period, t, and β is the discount factor for period t to t + 1. Equation 1 shows that the algebraic sign of the relation between the expected risk premium and the conditional volatility of an asset's risk premium is determined by the correlation between the asset's return and the SDF. That is, the direction of the relation between the asset return and the ratio of intertemporal marginal utilities in consumption inversely determines the relation between the expected risk premium and conditional volatility. When the correlation is equal to negative one, the asset's conditional expected risk premium is perfectly positively correlated with its conditional volatility. A positive relation between the conditionally expected risk premium and volatility obtains when $-1 < corr_t < 0$. A negative relation obtains when $0 < corr_t < 1$. For an asset that represents a perfect hedge against shocks to the marginal utility of consumption, with $corr_t = 1$, there will be a perfect negative correlation between the conditionally expected risk premium and its volatility.² Therefore, estimates of the relation between the first two conditional moments of a public utility stock's returns provide a direct test of the effectiveness of a public utility stock, or any asset, as a consumption hedging asset. In Eq. 1, $vol_t[M_{t+1}]/E_t[M_{t+1}]$ is the slope of the meanvariance frontier. If this slope changes over time, the estimated relation between the stock's risk and return will vary over time. This model can also be viewed simplistically as the projected expected risk premium as a function of its own projected risk, given information available at time t.

Note that the model allows for the expected risk premium to be negative if the asset hedges shocks to the marginal utility of consumption. Investors are willing to accept an expected rate of return lower than the risk-free rate of return if the pattern of volatility is such that returns are expected to rise with expected reductions in consumption. Simply, investors are willing to *pay* a premium for a higher level of returns volatility that has the desired pattern of returns. These desired returns patterns have a tendency to offset drops in consumption. Therefore, this model shows that investors may not be averse to volatility, but rather to the timing of expected changes in returns.

Summarizing, several conclusions can be drawn from the general model of asset pricing. First, the sign of the relation between a stock's risk premium and conditional volatility depends on the extent to which the stock serves as an intertemporal hedge against shocks to the marginal utility of consumption. Second, the relation between stock risk and return may be time-varying depending on changes in the slope of the mean-variance frontier. Third, hedging assets have desired patterns of volatility that result in expected rates of return that are less than the risk-free rate. We do not expect

 $^{^2}$ A hedging asset is one that has a positive increase in returns that is coincident with a positive shock in the ratio of intertemporal marginal utilities of consumption. Note that if we assume a concave utility function in consumption, as consumption declines, the marginal utility of consumption rises relative to last period marginal utility. If we think of a decline in consumption as a contraction in the business cycle, the hedging asset delivers positive changes in returns when the business cycle is moving into a contraction, and therefore the asset is a business cycle hedge.

that public utility stocks serve as a hedging asset as they are not viewed as defensive stocks (they do not rise in value during downturns in the stock market) due to asymmetric regulation and returns as discussed in detail in Kolbe and Tye (1990). Under asymmetric regulation, utility regulators have a tendency to allow the return on equity to fall below the allowed return during downturns in the business cycle and to reduce the return should it rise above the allowed return during expansions. Therefore we expect that the parameter estimates of the return-risk relationship to be positive as utility stocks are hypothesized to not be hedges.

We use the GARCH model to estimate the general asset pricing model since the GARCH model accommodates ARCH effects that improve the efficiency of the parameter estimates. It also provides a volatility forecasting model for the conditional volatility of the asset's risk premium. The conditional volatility projection is used, in turn to predict the expected risk premium. We also use the GARCH-in-Mean model (GARCH-M) since it specifies that the conditional expected risk premium is a linear function of its conditional volatility. There is a vast body of literature that estimates asset pricing models with the GARCH and GARCH-M methods and therefore we will not attempt to summarize them here.

The GARCH-M model was initially developed and tested by Engle et al. (1987) to estimate the relationship between US Treasury and corporate bond risk premia and their expected volatilities. The GARCH-M model is specified as:

$$R_{t+1} - R_{f,t+1} = \alpha \sigma_{t+1}^2 + \varepsilon_{t+1}$$
(2)

$$\sigma_{t+1}^2 = \beta_0 + \beta_1 \sigma_t^2 + \beta_2 \varepsilon_t^2 + \eta_{t+1}$$
(3)

$$\varepsilon_t | \psi_{t-1} \sim T(0, \sigma_t^2) \tag{4}$$

where R_{t+1} is the expected total return on the public utility stock index or individual utility stock; $R_{f,t+1}$ is the risk-free rate of return or the yield on an index of public utility bonds of a specified bond rating for the equity-to-debt premium; σ_{t+1}^2 is the conditional or predicted variance of the risk premium that is conditioned on past information (ψ_{t-1}); and ε_t is the error term that is conditional on ψ_{t-1} .

The conditional distribution of the error term is specified as the non-unitary variance T-distribution due to the thick-tailed distribution of the risk premia data. If the error distribution is thick-tailed, using an approximating distribution that accommodates thick tails improves the efficiency of the estimates. The parameter, α , is the return-to-risk coefficient as specified in Eq. 1 as:

$$\alpha = -\frac{vol_t[M_{t+1}]}{E_t[M_{t+1}]}corr_t[M_{t+1}, R_{i,t+1}]$$
(5)

Note that the coefficient will be positive if the conditional correlation between the SDF and the asset return is negative, indicating that the stock is not a hedging asset. Recall that the SDF is the ratio of intertemporal marginal utilities. Assuming a concave utility function, an upward shock in the ratio implies falling consumption, therefore an associated rise (positive correlation) in the return (R_i) would offset the reduction
in consumption, thereby causing the sign of α to be negative. The parameter, α , is also the ratio of risk premium to variance, or, the Sharpe ratio.

The intercept in Eq. 2 is restricted to zero as specified by the general asset pricing model specification. The restriction on the intercept equal to zero has been found to be robust in producing consistently positive and significant relationships between equity risk premia and risk in GARCH-M models. This is discussed in Lanne and Saikkonen (2006) and Lanne and Luoto (2007). We have found the same results in our modeling in this paper, although we have excluded these results for brevity (available upon request). Therefore we specify the prior assumption that the intercept or the "excess" return, i.e., the return not associated with risk to be equal to zero and drop the intercept from the model.

The consumption asset pricing model is estimated in the empirical section of the paper and applied in the applications section of the paper. The model is tested to (1) determine if equity-to-debt risk premium indices for utilities of differing risk specified by differing bond ratings are validated by the asset pricing model and therefore have some empirical support for risk premium prediction and application to utility cost of capital estimation, (2) determine whether equity risk premia can be predicted and fit the model and therefore be used to estimate the cost of common equity, (3) empirically test the consumption asset pricing model, and (4) ascertain whether utility stocks are assets that hedge shocks to the marginal utility of consumption.

If utility stocks are hedging assets then the cost of common equity should reflect a downward adjustment to a specified risk-free rate to reflect investors' preferences for a hedge and the compensation that they are willing to pay for it.

3 Data and empirical results

We use portfolios as represented by public utility stock and bond indices to estimate the conditional return-risk relationship for the equity-to-debt premium. The equityto-debt risk premium data employed for estimating Eq. 1 with the GARCH-M conditional return-risk regressions are monthly total returns on the Standard and Poor's Public Utilities Stock Index (utility portfolio), and the monthly Moody's Public Utility Aa, A, and Baa yields for the debt cost. We also obtained equity risk premia for the utility portfolio using the Fama-French specified risk-free rate of return, which is the holding period return on a 1-month US Treasury Bill. The data range from January 1928 to December 2007 with 960 observations. The return-risk relationships for the equity-to-debt premia are risk-differentiated by their own bond rating.

As a check, we also estimate Eq. 1 with the GARCH-M for large common stock returns using the monthly Ibbotson Large Company Common Stocks Portfolio total returns and the Ibbotson US Long-Term Government income returns as the risk-free rate. Additionally, as another check, we do the same for the University of Chicago's Center for Research in Security Prices value-weighted stock index (CRSP) using the Fama-French risk-free rate. This is the Fama-French specification of the market equity risk premium. The data range from January 1926 to December 2007 with 984 observations for the Large Company Common Stock estimation and the data ranges

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Utility bond rating	Mean	Std. Dev.	Skewness	Kurtosis	JB	
Aa	0.0037	0.0568	0.0744	10.07	2,001.2***	
A	0.0035	0.0568	0.0632	10.06	1,991.8***	
Baa	0.0031	0.0568	0.0375	10.02	1,973.6***	
Ibbotson						
Large common stocks	0.0054	0.0554	0.4300	12.84	3,954.7***	
CRSP value-weighted stock index	0.0062	0.0544	0.2309	10.92	2,519.1***	

 Table 1 Descriptive statistics: public utility and large company common stocks equity-to-debt and equity risk premia

The public utility equity-to-debt risk premia monthly time series is from January 1928 to December 2007 with 960 observations. The equity risk premium monthly time series for the Large Common Stocks and the CRSP index are January 1926 to December 2007 with 984 observations, and January 1926 to December 2007 with 984 observations, and January 1926 to December 2007 with 984 observations, respectively. The public utility stocks equity-to-debt risk premia are calculated as the total return on the S&P Public Utilities Index of stocks minus the Moody's Public Utility Aa, A, and Baa Indices yields to maturity. The Large Company Common Stocks Portfolio minus the Ibbotson Long-Term US Government Bonds Portfolio income yield. The CRSP equity risk premia, or the Fama-French market risk premia are the CRSP total returns on the value-weighted equity index minus the 1-month holding period return on a 1 month Treasury Bill. The Jarque-Bera (JB) statistic is a goodness-of-fit measure of the departure of the distribution of a data series from normality, based on the levels of skewness and excess kurtosis. The JB statistic is χ^2 distributed with 2° of freedom. *** Significant at 0.01 level, one-tailed test

from January 1928 to January 2007 with 960 observations (same as the utilities) for the CRSP estimation.

Table 1 displays the descriptive statistics for these data. We have estimated the mean, standard deviation, skewness and kurtosis parameters, as well as the Jarque-Bera (JB) statistic to test the distribution of the data. The means of the utility equity-to-debt risk premia fall as the risk (bond rating) declines. This is consistent with the notion that larger yields are subtracted from stock returns the lower the bond rating. Intertemporally, there is an inverse relationship between risk premia and interest rates (See Brigham et al. (1985) and Harris et al. (2003)). The mean for risk premia will have a tendency to be larger during low interest rate periods.

Not surprisingly, large company common stocks have the highest mean risk premia as the majority of these firms are not rate-of-return regulated firms with a ceiling on their ROE's close to their cost of capital. Interestingly, the standard deviations of the utility stock returns are similar and slightly higher than large company common stocks. Skewness coefficients are small and positive except for Ibbotson large company common stock returns and CRSP returns that have large positive skewness. This suggests that large unregulated stocks have a tendency to have more and larger positive shocks in returns than do utilities that are rate of return regulated. The kurtosis values show that all of the risk premia are thick-tail distributed. This is also found in the significant JB statistics that test the null hypothesis that the data are normally distributed. The null hypothesis is rejected for all assets. The high kurtosis, low skewness, and significant JB statistics show that the risk premia data are substantially thick-tailed, except for non-utility stocks that are both skewed and thick-tailed. Therefore, robust estimation methods are required to produce efficient regression estimates with non-normal data. Additionally, although not shown but available upon request, the serial correlation and

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ARCH Lagrange Multiplier tests show that residuals from OLS regressions of risk premia on volatilities follow an ARCH process. Therefore, the GARCH-M method will improve the efficiency of the estimates. We specify the regression error distribution as a non-unitary variance T-distribution so that thick-tails could be accommodated in the estimation and therefore produce increasingly efficient parameter estimates.

We used maximum likelihood estimation with the likelihood function specified with the non-unitary-variance T-distribution as the approximating distribution of the residuals to accommodate the thick-tailed nature of the error distribution. The equations are estimated as a system using the Marquardt iterative optimization algorithm. The chosen software for estimating the model was EViews[©] version 6.0 (2007).

Table 2 shows the GARCH-M estimations for the consumption asset pricing Eq. 1. We have estimated Eq. 1 for the utility equity risk premia using the Fama-French risk-free rate in addition to the equity-to-debt risk premia risk-differentiated by bond ratings and the two measures of the market equity risk premium. The chosen measure of volatility is the variance of risk premium (in contrast to other such measures such as the standard deviation or the log of variance. Although these results are not shown for brevity, they are robust to these other measures of volatility). The slope, which is the predicted return-to-predicted risk coefficient and Sharpe ratio, is positive and significant at the 99% level for all assets except the utility stock returns with Baa bonds, which is significant at the 95% level. Given that all slopes are positive, public utility stocks are not found to hedge shocks to the marginal utility of consumption. Note that the reward-to-risk slope rises as bond rating rises. This suggests that lower risk utility stocks provide a higher incremental risk-premium for an increase in conditional volatility. This is consistent with other studies that find that lower risk assets, such as shorter maturity bonds, have higher Sharpe Ratios than longterm bonds and stocks. See Pilotte and Sterbenz (2006) and Michelfelder and Pilotte (2011).

The variance equation shows that all GARCH coefficients (β 's) are significant at the 1% level and the sums of β_1 and β_2 are close to, but less than 1.0, indicating that the residuals of the risk premium equation follow a GARCH process and that the persistence of a volatility shock on returns and stock prices for utility stocks is temporary. The estimates of the non-unitary variance T-distribution degrees of freedom parameter are low and statistically significant, indicating that the residuals are well approximated by the T. Similar values for the log-likelihood functions (Log-L) show that each of the regressions has a similar goodness-of-fit. Chi-squared distributed likelihood ratio tests (not shown but available upon request) that compare the goodness of fit among the T and normal specifications of the likelihood function of the GARCH-M regressions show that the T has a significantly better fit than the normal distribution.

The GARCH-M results for the large company common stocks portfolio are similar to those of the utility stocks. Not surprisingly, large company common stocks do not hedge shocks to the marginal utility of consumption and volatility shocks temporarily affect their valuations. The exception is that the return-risk slope is substantially higher than utility stock slopes. This is partially due to the risk-free nature of the risk-free rates used with the non-utility equity risk premia compared to the

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Utility bond rating	α	β_0	β_1	β2	Log-L	T dist. D.F.	
Aa	1.5183*** (0.5308)	0.0000** (0.0000)	0.8791*** (0.0230)	0.1031*** (0.0219)	1,604.4	9.9254*** (3.0272)	
A	1.4536*** (0.5308)	0.0000** (0.0000)	0.8790*** (0.0230)	0.1033*** (0.0220)	1,605.0	9.9381*** (3.0408)	
Baa	1.3318** (0.5303)	0.0000** (0.0000)	0.8789*** (0.0229)	0.1040*** (0.0220)	1,605.2	10.0*** (3.0540)	
Fama-French R_f	2.1428*** (0.5318)	0.0000** (0.0000)	0.8811*** (0.0232)	0.0979*** (0.0212)	1,601.0	9.8773*** (2.9700)	
Ibbotson							
Large company common	2.7753*** (0.5513)	0.0001*** (0.0000)	0.8381*** (0.0269)	0.1186*** (0.0332)	1,620.8	8.8457*** (2.1613)	
CRSP value-weighted stock index	3.3873*** (0.5673)	0.0001*** (0.0000)	0.8330*** (0.0270)	0.1149*** (0.0358)	1,598.9	8.8571*** (1.9505)	

 Table 2
 Estimation of return-risk relation: public utility and large company common stocks

The results below are the GARCH-in-Mean regressions for the risk premium $(R_{t+1} - R_{f,t+1})$ on the conditional variance of the risk premium (σ_{t+1}^2) in the mean equation. The intercept in the mean equation is restricted to be equal to zero. The public utility equity-to-debt risk premia monthly time series is from January 1928 to December 2007 with 960 observations. The equity risk premium monthly time series for the Large Company Common Stocks and the CRSP index are January 1926 to December 2007 with 984 observations, and January 1926 to December 2007 with 984 observations, respectively. The public utility stocks equity-to-debt risk premia are calculated as the total return on the S&P Public Utilities Index of stocks minus the Moody's Public Utility Aa, A, and Baa Indices yields to maturity. The Large Company Common Stocks Portfolio minus the Ibbotson Long-Term US Government Bonds Portfolio income yield. The CRSP equity risk premia, or the Fama-French market risk premia are the CRSP total returns on the value-weighted equity index minus the 1-month holding period return on a 1 month Treasury Bill. The estimated model is:

the 1-month holding period return on a 1 month Treasury Bill. The estimated model is: $R_{t+1} - R_{f,t+1} = \alpha \sigma_{t+1}^2 + \varepsilon_{t+1}$ where $\alpha = -\frac{vol_t[M_{t+1}]}{E_t[M_{t+1}]} corr_t[M_{t+1}, R_{i,t+1}]$

 $\sigma_{t+1}^2 = \beta_0 + \beta_1 \sigma_t^2 + \beta_2 \varepsilon_t^2 + \eta_{t+1}$

The conditional distribution of the error term is the non-unitary variance T-distribution to accommodate the kurtosis of the risk premia and error term. Standard errors are in parentheses. ***, **, * denote significance at the 0.01, 0.05, and 0.10 levels, respectively for two-tail tests

utility bond yields that reflect risk. The utility stocks slope value of 2.1428 using the Fama-French risk-free rate is closer to the higher CRSP value of 3.3873 that is also based on the Fama-French risk-free rate. This is inconsistent with previous results herein and in other papers that find that Sharpe Ratios are lower for higher risk assets unless this finding can be interpreted as utility stocks having more risk than non-regulated stocks. The standard deviations on Table 1 suggest that utility stock return volatilities are as high as the stock returns of non-regulated firms. However, similar model estimates of portfolios of common stocks yield unstable results, such as negative as well as positive return-risk slopes when the intercept is not restricted to zero. See Campbell (1987), Glosten et al. (1993), Harvey (2001), and Whitelaw (1994). New approach to estimating the cost of common equity capital

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Stock market results are highly sensitive to empirical model specification. Many studies do not consider the impact of a zero-intercept prior restriction on the stability of their results. This simple innovation has led to more consistent results in modeling stock market risk-return relationships, and therefore we have included it in this paper.

The estimation of the consumption asset pricing model for utility stock equitydebt risk premia shows that the use of bond-rating risk-differentiated risk premia are validated as their risk-return relationships are well-fitted by theoretical and empirical models of risk and return. Therefore, these data impound good representations of the risk and reward relationship.

One concern is the intertemporal stability of the alphas. Figure 1 plots the utility stock portfolio alpha (using the Fama-French R_f to calculate the premium) and its standard error for 240 month rolling regressions of the model estimated with GARCH-M in the same manner as described above to review the intertemporal stability of the alpha. A 20-year period was used for each estimation to trade off timeliness with sufficient observation of up and down stock market regimes and business cycles. This resulted in 720 estimated alphas from 1947 to 2007. The results show that the utility alpha is stable to the extent that the algebraic sign is always positive and generally significant, therefore the nature of utility stocks are assets that are not and have never been hedges during the second half of the twentieth century up to the present. The value of the alpha does change substantially. The mean of the alpha is 4.40 with a range from -0.11 (insignificantly different from 0) to 11.66. As a comparison, the alpha for the CRSP value-weighted stock index was also estimated with rolling regressions in the same manner and for the same time period. Figure 2 is a plot of the CRSP alpha and standard error. Note that the general stock market alpha is similar to that of utility stocks. They are all positive and almost all statistically significant and follow a strikingly similar cycle. Figure 3 plots both the utility and stock market alphas and demonstrates the similarity. The correlation coefficient between the utility and stock market alphas is 0.88. Recalling that the alpha is a Sharpe Ratio, we see that return to risk ratio does change substantially. This is consistent with the results in Pilotte and Sterbenz (2006).

One other interesting observation is that the standard errors of the alphas are highly stable over the study period and are very similar in magnitude regardless of the size of the corresponding alpha. Whereas the alpha follows a cyclical pattern, the volatility in alpha is highly stationary around a constant, long-run mean.

The GARCH-M model estimations of the consumption asset pricing model were specified with variance as the measure of volatility. We also performed the same model estimations with alternative specifications of volatility such as the standard deviation and the log of variance and the results were not sensitive to this specification.

4 Application

We apply the model in this section to compare the cost of common equity capital estimates with the DCF and CAPM models. Using EViews[©] Version 6.0, we estimated the model coefficients (α , $\beta's$) over rolling 24 month periods ending December 2008.

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Fig. 1 Rolling 240 month utility stock alphas 1947–2007



Fig. 2 Rolling 240 month CRSP value-weighted alphas 1947–2007

We repeated the estimation over 5, 10, 15, 20 and 79 year periods.³ Predicted monthly variances (σ_{l+1}^2) were generated from these estimations to produce predicted risk premiums that were calculated by multiplying the predicted variance by the " α " slope

 $^{^{3}}$ We did not include the results of the 10 and 15 year estimations to abbreviate the amount of empirical results presented since they added no material insights beyond those already presented.



Fig. 3 Rolling 240 month CRSP and utility alphas 1947–2007

Table 3 Estimates of e	expected risk premia
--------------------------------	----------------------

	Mean (%))	Range (%)		Standard deviation (%)			
	Average	Spot	Average	Average Spot		Spot		
Ibbotson Associates d	ata							
79-years	9.59	5.76	8.74-9.96	2.62-22.60	0.32	5.24		
20-years	6.77	6.94	4.99-8.50	2.24-28.95	0.95	6.88		
5-years	4.20	10.25	-98.49-11.62	-100.00-39.65	22.00	26.61		
S&P Utility Index								
79-years	5.28	2.90	4.30-5.28	1.65-8.15	0.32	1.60		
20-years	3.93	3.51	2.78-5.03	2.18-6.88	0.57	1.11		
5-years	31.82	326.63	7.77–156.97	6.12-6465.74	31.47	1283.51		

coefficient. To test the stability of the predicted risk premia over time, the predicted risk premia were calculated using either the predicted variance over each entire time period or the last monthly (spot) predicted variance. Table 3 presents the mean predicted risk premia, the range of predicted premia and the standard deviations for each time period. It is clear from the results that the risk premia are more stable over the rolling 24 month period when calculated using the average predicted variance compared with using the spot variance. Secondly, the 20 and 79 year means are substantially more stable and reasonable in magnitude than the 5 year means.

Next, given the lessons from the analyses above, we apply the model to mechanically⁴ estimate the cost of common equity for 8 utility companies using the model and

⁴ The term "mechanically" in this context means that the resulting values have been developed in a consistent manner with the same inputs across all utility stocks but no subjective judgment was used to develop final values for each specific utility stock application.

the DCF and CAPM as comparisons. We also calculated the realized market return for comparison. Two publicly-traded electric, electric and gas combination, gas, and water utilities respectively were chosen for the application. The Gordon (1974) DCF and CAPM models are used in many utility regulatory jurisdictions in the US.

The DCF was applied using a dividend yield, D_0/P_0 , derived by dividing the yearend indicated dividend per share (D_0) by the year-end spot market price (P_0) . The dividend yield is grown by the year-end I/B/E/S five year projected earnings per share growth rate (g) to derive $D_0(1+g)/P_0$. The one-year predicted dividend yield is then added to the I/B/E/S five-year projected EPS growth rate to obtain the DCF estimate of the cost of common equity capital, k. This study was conducted for the 5 years ending 2008.

The CAPM was applied by multiplying the Value Line beta (β) available at yearend for each company by the long-term historic arithmetic mean market risk premium $(R_m - R_f)$. $R_m - R_f$ is derived as the spread of the total return of large company common stocks over the income return on long-term government bonds from the Ibbotson SBBI 2009 Valuation Yearbook. The resulting company-specific market equity risk premium is then added to a projected consensus estimate of the yield on 30-year U.S. Treasury rate provided by Blue Chip Financial Forecasts as the risk-free rate (R_f) to obtain the CAPM result. This study was also conducted over the 5 years ending 2008.

Figures 4–11 show the histograms of the cost of common equity capital estimations for each of the eight public utility stocks and the realized market returns in the forthcoming year. The consumption asset pricing model appears to track more consistently with the CAPM than with the DCF which seems to produce generally lower values than the other methods. The consumption asset pricing model results are similar to the CAPM. The model and the CAPM compete as the best predictor of the rate of return on the book value of common equity (not shown but available upon request), but none of the expected returns were good predictors of market returns. That does not infer that they were not good predictors of *expected* market returns. These results are an initial indicator that the consumption asset pricing model provides reasonable and stable results. This paper does not suggest at this early juncture that the consumption asset pricing model is superior to the CAPM or DCF, although it is based on far less restrictive assumptions than these other models. For example, both the DCF and CAPM assume that markets are efficient. Many assume that the DCF requires that the market-to-book ratio to always equal one, whereas the long-term value for the Standard and Poor's 500 is equal to 2.34. The CAPM assumes that investors demand higher returns for higher volatility and that the minimum required return is the risk-free rate, whereas the consumption asset pricing model allows for investors to require returns less than the risk-free rate for stocks that may have relatively higher volatility but are hedging assets that have desirable return fluctuation patterns that offset downturns in the business cycle. Unlike the CAPM, the model prices the risk to which investors are actually exposed, whether it's systematic risk or not. Some investors are diversified and some are not; the model prices whatever risk to which the aggregate of investors of the specific stock is exposed.

We find that the consumption asset pricing model should be used in combination with other cost of common equity pricing models as additional information in the devel-

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Cost of Common Equity Results for Edison International Compared to Market Return* M PRPM M CAPM = DCF Actual

* Market returns calculated for the following years: 2005 -2009

Cost of Common Equity Results for Southern Company Compared to Market Return*

9.84% 9.76% 9.55% 9.64% 0.809 9.42% 9.08% 8.88% 9.18% 9.37% 8.57% -0.03% 2004 2005 2006 2007 2008 -7.60% -9.83% -11.63%

🏼 PRPM 🕮 CAPM 🚿 DCF 🗮 Actual

* Market returnscalculated for the following years: 2005 -2009









I PRPM I CAPM DCF Actual



Figs. 4-11 Comparison of the cost of common equity estimates and market

opment of a cost of common equity capital recommendation. Practitioners may find the modeling methods and the use of relatively advanced econometric methods rather cumbersome. The software for performing these estimations is readily available from EViews[©] and SAS[©]; two commonly available software packages at utilities, consult-

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-7.30%



-11.94% * Market returnscalculated for following years: 2005 -2009 Missing DCF Cost of Capital Estimate Due to Unavailable Growth Rate

Figs. 4-11 continued

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ing firms and financial firms. Recent Ph.D. and M.S. holding members of research departments of investment and consulting firms have ready access to the model and methods discussed in this paper, although it will require years for these tools, like any "new" technology, to diffuse into standard use. Another problem is that the model requires a substantial time series history on stock returns data to develop stable estimates of risk premia This is problematic especially for the electric and gas utility industries that have consolidated with many mergers in the recent past. This problem can be addressed by developing and predicting the value-weighted risk premium of a portfolio of similar stocks such as electric utilities that have nuclear generating assets. The specific stock in question would be included in the returns index with a weight based on market capitalization that would go to 0 when the stock price history is no longer existent reaching back into the past.

5 Conclusion

The purpose of this paper is to introduce, test empirically and apply a general consumption based asset pricing model that is based on a minimum of assumptions and restrictions that can be used to predict the risk premium to be applied in estimating the cost of common equity for public utilities in regulatory proceedings. The results support the simple consumption-based asset pricing model that predicts the ex ante risk premium with a conditionally predicted volatility in risk premium. The estimates of the cost of common equity from the consumption asset pricing model compare well with rates of return on the book value of common equity and with the CAPM, although both the model and the CAPM results are substantially higher than the DCF. This is quite common in the practice of the cost of common equity in the utility industry. The results of the model are stable and consistent over time. Therefore the model should be considered as it provides additional evidence on the cost of common equity in general and specifically in public utility regulatory proceedings. Secondly, the use of bondrated yields to predict risk differentiated equity-to-debt risk premia is supported by the empirical evidence and therefore should be applied in estimating the cost of common equity. Finally, the robust empirical evidence on the positive risk-return relationship also shows that utility stocks are not a consumption hedge and are not good hedging securities against contractions in the economy. The model and estimation methodology presented in this paper provide a relatively simple tool to determine whether any asset is a hedge to adverse changes in the business cycle through the level of consumption in the economy.

Acknowledgments We would like to thank Dylan D'Ascendis, Sal Giunta, Selby Jones, III and Alison McVicker for highly capable research assistance, participants at the Center for Research in Regulated Industries Eastern Conferences and the Society of Utility Regulatory and Financial Analysts Annual Financial Forum, two anonymous reviewers and the editor for helpful comments.

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Exhibit No.___ Schedule PMA-6 Rebuttal Page 1 of 15

Comparative Evaluation of the Predictive Risk Premium Model[™], the Discounted Cash Flow Model and the Capital Asset Pricing Model for Estimating the Cost of Common Equity

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The authors wish to thank Selby P. Jones, III, Associate, AUS Consultants, for his technical assistance.

Abtract

The regulatory process for setting a utility's allowed rate of return on common equity has generally relied upon the Discounted Cash Flow Model and Capital Asset Pricing Model. Despite the widely known problems with these models, there has been little initiative to adopt more recently developed asset pricing models which have fewer limiting assumptions and require less subjective judgment. The December 2011 issue of the Journal of Regulatory Economics published the article "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities",ⁱ and introduced the Predictive Risk Premium ModelTM. The model is a general, yet simple, consumption-based asset pricing model of the risk / return relationship for common stocks which can be used to estimate the cost of common equity. The model produces stable, consistent and expectational results. This article presents in summary form exhaustive empirical testing of the PRPM[™] for utilities by industry. The empirical testing confirms the Journal of Regulatory Economics article conclusion: the PRPMTM produces stable, consistent, and reasonable results for each of the electric, electric and gas, gas local distribution, and water utility industries.

Introduction

The lead article in the July 2008 issue of this *Journal*, "Integrating Renewables into the US Grid: Is it Sustainable," by Professors Peter Mark Jansson and Richard A. Michelfelderⁱⁱ, called for the reregulation of the electric utility industry and putting the planning of generation assets, whether renewable or not, back in the hands of the experts and those ultimately responsible for reliability, the electric utilities. During the last ten years or so, states have been backpedalling on deregulation and therefore methods for estimating the cost of common equity and the allowed rate of return have generated new interest as regulating rate of return is not going away as once thought.

The regulatory process for setting a public utility's allowed rate of return on common equity has generally relied upon the familiar Gordon Discounted Cash Flow Model (DCF) and Capital Asset Pricing Model (CAPM). Despite the widely known problems with these models, there has been little initiative to adopt more recently developed asset pricing models which have fewer limiting assumptions and require less subjective judgment than these traditional models. In December 2011, the article "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities",ⁱⁱⁱ published in *The Journal of Regulatory Economics* introduced the Predictive Risk Premium ModelTM (PRPMTM). The PRPMTM is a general, yet simple, consumption-based asset pricing model of the risk / return relationship for common stocks which can be used to estimate the cost rate of common equity (ROE). The stability and consistency of the results of PRPMTM

and the ex ante, i.e., expectational, nature of those results indicate that the model should be used to provide additional input into the process of determining an allowed rate of return on common equity for public utilities.

Since publication, more exhaustive empirical testing of the PRPM[™] was conducted for the four utility industry groups which comprise the AUS Utility Reports^{©iv} universe of publicly traded utilities: an electric utility group; a combination electric and natural gas distribution utility group; a natural gas distribution utility group; and, a water utility group. The empirical testing confirms the conclusion of the original *Journal of Regulatory Economics* article: the PRPM[™] produces stable results which are consistent over time.

Development of the PRPM[™]

The cost rate of common equity is not directly observable in the capital markets and must be inferred using various financial models. The most commonly used cost of common equity models in the regulatory arena are the aforementioned DCF and the CAPM. Since these models are based upon many restrictive assumptions, they involve a significant amount of analyst subjectivity in their application, resulting in much debate over the application and results of these models.

The empirical approach to the PRPM[™] is based upon the work of Robert F. Engle, Ph.D.^v who shared the Nobel Prize in Economics in 2003 "for methods of analyzing economic *time series* with time-varying volatility (*ARCH*)"^{vi}, with "ARCH" standing for autoregressive conditional heteroskedasticity. In other

words, volatility (variance) changes over time and is related to itself from one period to the next, especially in financial markets. Engle discovered that the volatility (usually measured by variance) in prices and returns clusters over time. Therefore, volatility is highly predictable and can be used to predict future levels of risk. The theoretical asset pricing model was recently developed in the *Journal of Economics and Business* in December 2011 by Rutgers University professors Richard Michelfelder and Eugene Pilotte^{vii}.

In this study, the PRPM[™] estimates the risk / return relationship directly using the outcomes of investors' historical pricing decisions and actual long-term U.S. Treasury security yields, with the predicted equity risk premium generated by the prediction of volatility, i.e., the risk, based upon the volatility of past equity risk premiums for the AUS Utility Reports universe of companies.

Estimation Method

The statistical details of the estimation method of the PRPM[™] can be found in the original article in the *Journal of Regulatory Economics*, "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities". Essentially, there are two steps to the application of the PRPM[™]. First, predicted volatility, i.e., risk, is derived based upon previous volatility plus previous prediction error, because volatility is highly predictable and correlated over time. Second, the predicted volatility can then be used to generate the predicted equity risk premium (ERP) by multiplying it by the GARCH coefficient,

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i.e., the slope of the predicted volatility. A risk-free rate is then added to the ERP to estimate the ROE, i.e., the market based cost of common equity.

Application of the PRPM[™] to Publicly Traded Utility Companies

The PRPMTM was applied to the companies comprising the AUS Utility Reports^{©,} utility industry groups: the electric, combination electric and natural gas distribution, natural gas distribution and water groups. The PRPMTM variances were calculated monthly for each individual utility beginning with the first available monthly data included for each individual utility in the University of Chicago Booth School of Business' Center for Research in Security Prices (CRSP[®]) and corresponding monthly long-term U.S. Treasury bond yields from Morningstar's *Ibbotson[®] SBBI[®] – 2012 Valuation Yearbook – Market Results for Stocks, Bonds, Bills and Inflation – 1926-2011 (SBBI)* through 72 month ending periods, i.e., January 2006 through December 2011.

Using EViews[©] Version 7.2, the PRPM[™] coefficients and predicted monthly variances were estimated as described in the *JRE* article for each time series of equity risk premiums. Consistent with the conclusion drawn in the *JRE* article, the predicted equity risk premiums were calculated using the averaged predicted volatilities (variances) over the entire time period for which CRSP data were available for each utility, multiplied by the GARCH, or slope, coefficient generated through EViews[®] for each time series. To calculate the PRPM[™] cost rate of common equity for each utility, the average predicted utility specific equity risk premium through each month ending from January 2006 through December 2011 was then added to the projected consensus forecast of the expected yields

on 30-year U.S. Treasury bonds for the next six quarters by the reporting economists in the concurrent *Blue Chip Financial Forecasts (Blue Chip)*.

The DCF was applied in a simple manner, using a dividend yield, D_0 / P_0 , derived by dividing the month-end indicated dividend per share (D_0) by the month-end closing market price (P_0) for each utility. The dividend yield was then grown by the month-end I/B/E/S consensus five-year projected earnings per share (EPS) growth rate (g) to derive (D_0 (1 + g) / P_0). The one-month predicted dividend yield was then added to the concurrent month's I/B/E/S consensus five-year average projected EPS growth rate to obtain the DCF estimate of the cost of common equity capital, k. The DCF estimates were also calculated for each month from January 2006 through December 2011.

The CAPM was applied by multiplying *Value Line Inc.'s* beta (β)^{viii}, for each utility, by the long-term historical arithmetic mean market equity risk premium ($R_m - R_f$) through the previous year. ($R_m - R_f$) was derived as the spread of the total return of large company common stocks over the income return on long-term government bonds from the annual <u>SBBI Valuation</u> <u>Yearbooks</u> for the years ending 2005 through 2010. The resulting utility-specific equity risk premium was then added to the same projected consensus forecast of the expected yields on 30-year U.S. Treasury bonds for the next six quarters by the reporting economists in the concurrent *Blue Chip* discussed above, to obtain the CAPM estimate of the cost of common equity capital, *k*. The CAPM estimates were also calculated for each month from January 2006 through December 2011.

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Finally, the results for each of the models, the PRPM[™], DCF, and CAPM, were averaged for each utility group^{ix}. Chart 1 presents the average PRPM[™] results for each of the AUS Utility Reports[©] utility groups for each month from January 2006 through December 2011.



Chart 1

Chart 1 shows that indicated ROEs derived from the PRPM[™] were stable for all utility groups until the global financial crisis of 2008 – 2009. During 2008 and 2009, the PRPM[™] derived ROEs decline, which in the authors' opinion, was a result of a "flight to quality" by investors, i.e., the willingness of an investor to accept a lower, but more certain, return during financial downturns. Chart 1 also indicates that the PRPM[™] derived ROEs for the electric, combination electric and natural gas distribution and natural gas distribution utility groups follow a nearly identical pattern throughout the 72-month period, with the water utility group following a similar, but more volatile pattern.

Charts 2 through 5 present a comparison of the average PRPM[™], DCF, and CAPM cost of common equity estimates for each AUS Utility Reports[©] utility industry group, i.e., the electric utility group; the combination electric and natural gas distribution utility group; the natural gas distribution utility group; and, the water utility group for each month from January 2006 through December 2011.



Chart 2





Chart 4







Charts 2 through 5 clearly show that, for the most part, the PRPMTM produces a higher average indicated ROE than both the DCF and CAPM. This is due to the fact that the PRPMTM prices <u>all</u> of the risk which investors actually face collectively. In contrast, the CAPM prices systematic risk (that investors face only if they have a perfectly diversified portfolio, which does not exist) and the DCF uses accounting, not market, based I/B/E/S consensus five-year projected EPS growth rates.

Conclusion

In the authors' opinion, the PRPM[™] benefits ratemaking with an additional model to estimate ROE. To that end, the Principals of AUS Consultants have been including the PRPM[™] in their rate of return testimonies and the model has been presented publicly in several venues.[×]

Its results are stable and consistent over time. It is not based upon restrictive assumptions, as are the DCF and CAPM. The PRPM[™] is also not based upon an estimate of investor behavior, but rather, upon a statistical analysis of actual investor behavior by evaluating the results of that behavior, i.e., the volatility (variance) of historical equity risk premiums. In contrast, subjective decisions surround the choice of the inputs to both the DCF and CAPM, from the choice of the time period over which to measure the dividend yield for the DCF, the choice of the DCF growth rate (e.g., historical or projected, earnings per share or dividends per share, and the like), to the selection of the appropriate beta (e.g., adjusted or unadjusted), market equity risk premium (e.g., historical or projected) and the appropriate risk-free rate (e.g., historical or projected and/or long v. short term) for the CAPM. In addition, as previously discussed, the CAPM exclusively prices systematic risk. In contrast, the PRPMTM prices all of the risk actually faced collectively by investors, because the model does not assume that investors' portfolios are perfectly diversified containing no unsystematic risk.

In addition, the inputs to the PRPM[™] are widely available. The GARCH coefficient is calculated with the relatively inexpensive EViews[©], or other statistical, software, based upon the realized ERP, i.e., total returns minus the

risk-free rate. The only subjective decisions to be made when applying the

PRPM[™] relate to which risk-free rate to use, e.g., long-term or short-term, and

over what time period to estimate the $PRPM^{TM}$ derived ROEs.

For all of these reasons, the authors conclude that the PRPM[™] should be

considered as appropriate additional evidence to measure the cost of common equity in regulatory rate setting for public utilities.

Ahern, Pauline M., Hanley, Frank J. and Michelfelder, Richard A., "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities," *Journal of Regulatory Economics* (2011) 40:261-278.

Jansson, Peter Mark, Michelfelder, Richard A., "Integrating Renewables into the US Grid: Is It Sustainable," The Electricity Journal (2008, July) 21: 9-21.

Ahern, Pauline M., Hanley, Frank J. and Michelfelder, Richard A., "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities," *Journal of Regulatory Economics* (2011) 40:261-278.

^{iv} AUS Monthly Utility Reports is a monthly pocket reference book covering the electricity, combination electricity & natural gas distribution, natural gas distribution, and water companies which have publicly traded common stock. The monthly reports provide comprehensive information on key ratios and industry rankings based upon the financial statistics presented in the report.

Professor Emeritus, University of California, San Diego and currently the Michael Armellino Professor in Management of Financial Services at New York University, Stern School of Business.

www.nobelprize.org.

^{vii} Michelfelder, Richard, and Pilotte, Eugene, "Treasury Bond Risk and Return, the Implications for the Hedging of Consumption and Lessons for Asset Pricing," *Journal of Economics and Business* (2011) 63, 605-637.

^{viii} Using a proprietary data base available at mid-March, June, September, and December at the end of each year, from 2006 – 2011 from Value Line, Inc.

^{ix} The results shown in the accompanying charts represent AUS Utility group averages of only those utilities in each group for which it was possible to estimate all three models in any given month. For example, if ABC Utility did not have the I/B/E/S consensus growth rate necessary to calculate the DCF in a given month, that utility's PRPMTM and CAPM were not included in the group average for that month.

^x Edison Electric Institute Cost of Capital Working Group (Webinar 10/12); NARUC Staff Subcommittee on Accounting & Finance (9/12 & 3/10); National Association of Water Companies Finance/Accounting/Taxation and Rates & Regulations Committees (3/12); NARUC Water Committee (2/12); Wall St. Utility Group (12/11); IN Utility Regulatory Commission Cost of Capital Task Force (9/10); Financial Research Inst. of the Univ. of Missouri Hot Topic Hotline Webinar (12/10); and Center for Research in Regulated Industries Annual Eastern Conference (5/10 & 5/09).

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Pauline M. Ahern is a Principal and Director with AUS Consultants located in Mount Laurel, New Jersey. She has served investor-owned and municipal utilities and authorities for nearly 25 years. A Certified Rate of Return Analyst (CRRA), she is responsible for the development of rate of return analyses, including the development of ratemaking capital structure ratios, senior capital cost rates and the cost rate of common equity and related issues for regulated public utilities. She has testified as an expert witness before 29 regulatory commissions in the U.S. and Canada. In addition, she supervises the production of the various AUS Utility Reports publications and maintains the benchmark index against which the American Gas Association's Mutual Fund performance is measured. She holds an MBA in finance from Rutgers University and a Bachelor of Arts Degree in Economics/Econometrics from Clark University. She has coauthored the article "A New Approach for Estimating the Equity Risk Premium for Public Utilities", co-authored with Frank J. Hanley and Richard A. Michelfelder, Ph.D. published <u>The Journal of Regulatory Economics</u> in December 2011.

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Approach for Estimating the Cost of Common Equity Capital for Public Utilities" co-authored by AUS Consultants' colleagues Pauline M. Ahern, Frank J. Hanley and Richard A. Michelfelder, published in the *Journal of Regulatory Economics*. Mr. D'Ascendis is a member of the Society of Utility and Regulatory Financial Analysts and the National Association of Water Companies. He holds an M.B.A. in both Finance and International Business from Rutgers University and a Bachelor of Arts Degree in Economic History from the University of Pennsylvania.

Frank J. Hanley is a Principal of AUS Consultants located in Mt. Laurel, NJ. He joined the firm in 1971 as Vice President, was elected Senior Vice President in 1975, and President of the Utility Services Group in 1989. Mr. Hanley has testified on cost of capital and related financial issues in more than three hundred cases before thirty-three state regulatory commissions, the District of Columbia Public Service Commission, the Public Services Commission of the U.S. Virgin Islands, the Federal Energy Regulatory Commission, a U.S. District Court, a U.S. Bankruptcy Court and the U.S. Tax Court. He has represented a number of electric, natural gas distribution and transmission companies, oil pipeline companies, as well as steam heating, telephone, water and wastewater companies. Mr. Hanley is a graduate of Drexel University and is a Certified Rate of Return Analyst (CRRA). He is a member of the Society of Utility and Regulatory Financial Analysts. He is an Associate Member of the American Gas Association as well as a member of its Rate Committee; and an Associate Member of the Energy Association of Pennsylvania. Also, he is a member of the Executive Advisory Council of the Rutgers University School of Business at Camden as well as a member of the Advisory Council of New Mexico State University's Center for Public Utilities.



Comparable Earnings: New Life for an Old Precept

by Frank J. Hanley Pauline M. Ahern

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Comparable Earnings: New Life for an Old Precept

ccelerating deregulation has greatly increased the investment risk of natural gas utilities. As a result, the authors believe it more appropriate than ever to employ the comparable earnings model. We believe our application of the model overcomes the greatest traditional objection to it — lack of comparability of the selected nonutility proxy firms. Our illustration focuses on a target gas pipeline company with a beta of 0.96 — almost equal to the market's beta of 1.00.

Introduction

The comparable earnings model used to determine a common equity cost rate is deeply rooted in the standard of "corresponding risk" enunciated in the landmark *Bluefield* and *Hope* decisions of the U.S. Supreme Court.¹ With such solid grounding in the foundations of rate of return regulation, comparable earnings should be accepted as a principal model, along with the currently popular marketbased models, provided that its most common criticism, non-comparability of the proxy companies, is overcome.

Our comparable earnings model overcomes the non-comparability issue of the non-utility firms selected as a proxy for the target utility, in this example, a gas pipeline company. We should note that in the absence of common stock prices for the target utility (as with a wholly-owned subsidiary), it is appropriate to use the average of a proxy group of similar risk gas pipeline companies whose common stocks are actively traded. As we will demonstrate, our selection process results in a group of domestic, non-utility firms that is comparable in total risk, the sum of business and financial risk, which reflects both non-diversifiable systematic, or market, risk as well as diversifiable unsystematic, or firm-specific, risk.



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Embedded in the Landmark Decisions

As stated in *Bluefield* in 1922: "A public utility is entitled to such rates as will permit it to earn a return ... on investments in other business undertakings which are attended by corresponding risks and uncertainties ..."

In addition, the court stated in *Hope* in 1944: "By that standard the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks."

Thus, the "corresponding risk" pre-

cept of *Bluefield* and *Hope* predates the use of such market-based cost-of-equity models as the Discounted Cash Flow (DCF) and Capital Asset Pricing (CAPM), which were developed later and are currently popular in ratebase/rate-of-return regulation. Consequently, the comparable earnings model has a longer regulatory and judicial history. However, it has far greater relevance now than ever before in its history because significant deregulation has substantially increased natural gas utilities' investment risk to a level similar to that of non-utility firms. As a result, it is

more important than ever to look to similar-risk non-utility firms for insight into common equity cost rate, especially in view of the deficiencies inherent in the currently popular market-based cost of common equity models, particularly the DCF model.

Despite the fact that the landmark decisions are still regarded as having set the standards for determining a fair rate of return, the comparable earnings model has experienced decreased usage by expert witnesses, as well as less regulatory acceptance over the years. We believe the decline in the popularity of the comparable earnings model, in large measure, is attributable to the difficulty of selecting non-utility proxy firms that regulators will accept as comparable to the target utility. Regulatory acceptance is difficult to gain when the selection process is arbitrary. Our application of the model is objective and consistent with fundamental financial tenets.

Principles of Comparable Earnings

Regulation is a substitute for the competition of the marketplace. Moreover, regulated public utilities compete in the capital markets with all firms, including unregulated non-utilities. The comparable earnings model is based upon the opportunity cost principle; i.e., that the true cost of an investment is the return that could have been earned on the next best available alternative investment of similar risk. Consequently, the comparable earnings model is consistent with regulatory and financial principles, as it is a surrogate for the competition of the marketplace, and investors seek the greatest available rate of return for bearing similar risk.

The selection of comparable firms is the most difficult step in applying the comparable earnings model, as noted by Phillips² as well as by Bonbright, Danielsen and Kamerschen ³ The selection of non-utility proxy firms should result in a sufficiently broad-based group in order to minimize the effect of company-specific aberrations. However, if the selection process is arbitrary, it likely would result in a proxy group that is too broad-based, such as the Standard & Poor's 500 Composite Index or the Value Line Industrial Composite. The use of such groups would require subjective adjustments to the comparable earnings results to reflect risk differences between the group(s) and the target utility, a gas pipeline company in this example.

Authors' Selection Criteria

We base the selection of comparable non-utility firms on market-based, objective, quantitative measures of risk resulting from market prices that subsume investors' assessments of all elements of risk. Thus, our approach is based upon the principle of risk and return: namely, that firms of comparable risk should be expected to earn comparable returns. It is also consistent with the "corresponding risk" standard established in Bluefield and Hope. We measure total investment risk as the sum of non-diversifiable systematic and diversifiable unsystematic risk. We use the unadjusted beta as a measure of systematic risk and the standard error of the estimate (residual standard error) as a measure of unsystematic risk. Both the unadjusted beta and the residual standard error are derived from a regression of the target utility's security returns relative to the market's returns, which takes the general form:

- $r_{it} = a_i + b_i r_{mt} + e_{it}$ where:
 - r_{ii} = *t*th observation of the *i*th utility's rate of return
 - $r_{mt} = t$ th observation of the market's rate of return
 - $e_{it} = t$ th random error term
 - a_i = constant least-squares regression coefficient
 - b_i = least-squares regression slope coefficient, the unadjusted beta.

As shown by Francis,⁴ the total variation or risk of a firm's return, Var (r_i) , comes from two sources:

Var (r_i) = total risk of *i*th asset

= $\operatorname{var}(a_i + b_i r_m + e)$ substituting $(a_i + b_i r_m + e)$ for r_i = $\operatorname{var}(b_i r_m) + \operatorname{var}(e)$ since $\operatorname{var}(a_i) = 0$ = $b_i^2 \operatorname{var}(r_m) + \operatorname{var}(e)$ since $\operatorname{var}(b_i r_m) = b_i^2$ $\operatorname{var}(r_m)$ = systematic + unsystematic risk

Francis⁵ also notes: "The term $\sigma^2(r_i|r_m)$ is called the *residual variance* around the regression line in statistical terms or unsystematic risk in capital market theory language. $\sigma^2(r_i|r_m) = \dots$ = var (e). The residual variance is the squared standard error in regression language, a measure of unsystematic risk." Application of these criteria results in a group of non-utility firms whose average total investment risk is indeed comparable to that of the target gas pipeline.

As a measure of systematic risk, we use the Value Line unadjusted beta. Beta measures the extent to which marketwide or macro-economic events affect a firm's stock price. We use the unadjusted beta of the target utility as a starting point because it results from the regression of the target utility's security returns relative to the market's returns. Thus, the resulting standard deviation of beta relates to the unadjusted beta. We use the standard deviation of the unadjusted beta to determine the range around it as the selection criterion based on systematic risk.

We use the residual standard error of the regression as a measure of unsystematic risk. The residual standard error reflects the extent to which events specific to the firm's operations affect a firm's stock price. Thus, it is a measure of diversifiable, unsystematic, firmspecific risk.

An Illustration of Authors' Approach

Step One: We begin our approach by establishing the selection criteria as a range of both unadjusted beta and residual standard error of the target gas continued on page 6

pipeline company.

As shown in table 1, our target gas pipeline company has a Value Line unadjusted beta of 0.90, whose standard deviation is 0.1250. The selection criterion range of unadjusted beta is the unadjusted beta plus (+) and minus (-) three of its standard deviations. By using three standard deviations, 99.73 percent of the comparable unadjusted betas is captured.

Three standard deviations of the target utility's unadjusted beta equals 0.38 (0.1250 x 3 = 0.3750, rounded to 0.38). Consequently, the range of unadjusted betas to be used as a selection criteria is 0.52 - 1.28 (0.52 = 0.90 - 0.38) and (1.28 = 0.90 + 0.38).

Likewise, the selection criterion range of residual standard error equals the residual standard error plus (+) and minus (-) three of its standard deviations. The standard deviation of the residual standard error is defined as: $\sigma/\sqrt{2N}$.

As also shown in table 1, the target gas pipeline company has a residual standard error of 3.7867. According to the above formula, the standard deviation of the residual standard error would be $0.1664 (0.1664 = 3.7867/\sqrt{2(259)} =$ 37867/227596, where 259 = N, the number of weekly price change observations over a period of five years). Three standard deviations of the target utility's residual standard error would be 0.4992 (0.1664 x 3 = .4992). Consequently, the range of residual standard errors to be used as a selection criterion is 3.2875 - 4.2859 (3.2875 = 3.7867 -(4.2859 = 3.7867 +0.4992).

Step Two: The step one criteria are applied to Value Line's data base of nearly 4,000 firms for which Value Line derives unadjusted betas and residual standard errors on a weekly basis. All firms with unadjusted betas and residual standard errors within the criteria ranges are then selected.

Step Three: In the regulatory ratemaking environment, authorized common equity return rates are applied to a book-value rate base. Thus, the earnings rates on book common equity, or net worth, of competitive, non-utility firms are highly relevant provided those firms are indeed comparable in total risk to the target gas pipeline. The use of the return rates of other utilities has no relevance because their allowed, and hence subsequently achieved, earnings rates are dependent upon the regulatory

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Su for t Comparab	mmary of the he Proxy Gro le in Total Ri	c Company Sup of 24 sk to the	rable Earn 8 Non-Util Target Ga	lings Ana lity Comp Is Pipelin	lysis anies e Compa	ny ¹		
	1	2	3 residual	4	5 rate of	7 et worth	8	
	adj. heta	unadj. beta	standard error	3-year average ²	4-year averane ²	5-year averane ²	5-year projected ³	
average for the proxy group of 248 non-utility companies comparable in total risk to the							L. Sloving	
targel gas pipeline company	0.97	0.92	3.7705					
target gas pipelinė company	0.95	0.90	3./86/					
median				11.7%	12.0%	12.6%	15.5%	
average of the median	en e		2010 (J. 162) B		121%			
conclusion ⁵								13.8%
 ¹ The criteria for selection of the non-utility group group was selected based on an unadjusted be ²Ending 1992. ³1995-1998/1997-1999. ⁴ The average standard deviation of the target ga ⁵Equal weight given to both the average of the 3 (15.5%). Thus, 13.8% = (12.1% + 15.5% / 2). Source: Value Line Inc., March 15, 1994 Value Line Investment Survey 	p was that the non- ta range of 0.52 to s pipeline company -, 4- and 5-year his	utility compa 1.28 and a re 's unadjusted torical media	nies be domes sidual standar d beta is 0.125 ins (12.1%) an	stic and incluc d error range 0. d 5-year proj	led in <i>Value Li</i> of 3.2875 to ected median	ine Investment 4,2859. 4,2859. rate of returr	<i>Survey</i> . The nor 1 on net worth	n-utility

process. Consequently, we believe all utilities must be eliminated to avoid circularity. Moreover, we believe nondomestic firms must be eliminated because their reporting methods differ significantly from U.S. firms.

Step Four: We then eliminated those firms for which Value Line does not publish a "Ratings & Report" in *Value Line Investment Survey* so that the historical and projected returns on net worth⁶ are from a consistent source. We use historical returns on net worth for the most recent five years, as well as those projected three to five years into the future. We believe it is logical to evaluate both historical and projected return rates because it is reasonable to assume that investors avail themselves of both when they are available from widely disseminated information ser-

vices, such as Value Line Inc. The use of Value Line's return rates on net worth understates the common equity return rates for two reasons. First, preferred stock is included in net worth. Second, the net worth return rates are as of the end of each period. Thus, the use of average common equity return rates would yield higher results.

Step Five: Median returns based on the historical average three, four and five years ending 1992 and projected 1996-1998 or 1997-1999 rates of return on net worth are then determined as shown in columns 4 through 7 of table 1. The median is used due to the wide variations and skewness in rates of return on net worth for the non-utility firms as evidenced by the frequency distributions of those returns as shown in illustration 1. However, we show the average unadjusted beta, 0.92, and residual standard error, 3.7705, for the proxy group in columns 2 and 3 of table 1 because their frequency distributions are not significantly skewed, as shown in illustration 2.

Step Six: Our conclusion of a comcontinued on page 8





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parable earnings cost rate is based upon the mid-point of the average of the median three-, four- and five-year historical rates of return on net worth of 12.1 percent as shown in column 5 and the median projected 1996-1998/1997-1999 rate of return on net worth of 15.5 percent as shown in column 7 of table 1. As shown in column 8, it is 13.8 percent.

Summary

Our comparable earnings approach demonstrates that it is possible to select a proxy group of non-utility firms that is comparable in total risk to a target utility In our example, the 13.8 percent comparable earnings cost rate is very conservative as it is an expected achieved rate on book common equity (a regulatory allowed rate should be greater) and because it is based on endof-period net worth. A similar rate on average net worth would be about 20 to 40 basis points higher (i.e., 14.0 to 14.2 percent) and still understate the appropriate regulatory allowed rate of return on book common equity.

Our selection criteria are based upon measures of systematic and unsystematic risk, specifically unadjusted beta and residual standard error. They provide the basis for the objective selection of comparable non-utility firms. Our selection criteria rely on changes in market prices over approximately five years. We compare the aggregate total risk, or the sum of systematic and unsystematic risk, which reflects investors' aggregate assessment of both business and financial risk. Thus, no adjustments are necessary to the proxy group results to

Report Lists Pipeline, Storage Projects

More than \$9 billion worth of projects to expand the nation's natural gas pipeline network are in various stages of development, according to an A.G.A. report. These projects involve nearly 8,000 miles of new pipelines and capacity additions to existing lines and represent 15.3 billion cubic feet (Bcf) per day of new pipeline capacity.

During 1993 and early 1994, construction on 3,100 miles of pipeline was completed or under way, at a cost of nearly \$4 billion, says A.G.A. These projects are adding 5.4 Bcf in daily delivery capacity nationwide.

Among the projects completed in 1993 were Pacific Gas Transmission Co.'s 805 miles of looping that allows increased deliveries of Canadian gas to the West Coast; Northwest Pipeline Corp.'s addition of 433 million cubic feet of daily capacity for customers in the Pacific Northwest and Rocky Mountain areas; and the 156-mile Empire State Pipeline in New York.

In addition, major construction projects were started on the systems of Texas Eastern Transmission Corp. and Algonquin Gas Transmission Co. — both subsidiaries of Panhandle Eastern Corp. — and along Florida Gas Transmission Co.'s pipeline.

The report goes on to discuss another \$5 billion in proposed projects, which, if completed, will add nearly 5,000 miles of pipeline and 9.8 Bcf per day in capacity, much of it serving Florida and West Coast markets.

A.G.A. also identifies 47 storage projects and says that if all of them are built, existing storage capacity will increase by more than 500 Bcf, or 15 percent.

For a copy of New Pipeline Construction: Status Report 1993-94 (#F00103), call A.G.A. at (703) 841-8490. Price per copy is \$6 for employees of member companies and associates and \$12 for other customers.

compensate for the differences in business risk and financial risk, such as accounting practices and debt/equity ratios. Moreover, it is inappropriate to attempt a comparison of the target utility with any individual firm, or subset of firms, in the proxy group because only the average firm of the group is relevant.

Because the comparable earnings model is firmly anchored in the "corresponding risk" precept established in the landmark court decisions, it is worthy of consideration as a principal model for use in estimating the cost rate of common equity capital of a regulated utility. Our approach to the comparable earnings model produces a proxy group that is indeed comparable in total risk because the selection process is objective and quantitative. It therefore overcomes criticism linked to arbitrary selection processes.

All cost-of-common-equity models, including the DCF and CAPM, are fraught with deficiencies, usually stemming from the many necessary but unrealistic assumptions that underlie them. The effects of the deficiencies of individual models can be mitigated by using more than one model when estimating a utility's common equity cost rate. Therefore, when the non-comparability issue is overcome, the comparable earnings model deserves to receive the same consideration as a primary model, as do the currently popular market-based models.

²Charles F. Phillips Jr., <u>The Regulation of Public</u> <u>Utilities: Theory and Practice</u>, Public Utilities Reports Inc., 1988, p 379

³James C Bonbright, Albert L Danielsen and David R Kamerschen, <u>Principles of Public Utili-</u> <u>ties Rates</u>, 2nd edition, Public Utilities Reports Inc. 1988, p. 329.

⁴Jack Clark Francis, <u>Investments: Analysis and</u> <u>Management</u>, 3rd edition. McGraw-Hill Book Co., 1980, p. 363

⁵Id. p. 548

⁶Returns on net worth must be used when relying on Value Line data because returns on book common equity for non-utility firms are not available from Value Line

¹Bluefield Water Works Improvement Co. v. Public Service Commission. 262 U S 679 (1922) and Federal Power Commission v. Hope Natural Gas Co. 320 U.S 519 (1944).

United Water Rhode Island, Inc. Brief Summary of Common Equity Cost Rate

		Proxy Group of Nine Water
No.	Principal Methods	Companies
1.	Discounted Cash Flow Model (DCF) (1)	8.48 %
2.	Risk Premium Model (RPM) (2)	11.33
3.	Capital Asset Pricing Model (CAPM) (3)	9.36
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	10.67
5.	Indicated Common Equity Cost Rate before Adjustment for Business Risks	10.00 %
7	Business Risk Adjustment (5)	0.55
8.	Recommended Common Equity Cost Rate	10.55 %

- Notes: (1) From page 2 of this Schedule.
 - (2) From page 12 of this Schedule.
 - (3) From page 22 of this Schedule.
 - (4) From page 24 of this Schedule.
 - (5) Business risk adjustment to reflect United Water Rhode Island, Inc.'s greater business risk due to its small size relative to the proxy group as detailed in Ms. Ahern's accompanying direct testimony.

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the Proxy Group of Nine Water Companies

	<u>1</u> <u>2</u>		<u>3</u>	<u>4</u>	<u>4</u> <u>5</u>		<u>7</u>	<u>8</u>
	Average Dividend	Value Line Projected Five Year Growth in	Reuters Mean Consensus Projected Five Year Growth	Zack's Five Year Projected Growth	Yahoo! Finance Projected Five Year Growth in	Average Projected Five Year Growth in	Adjusted Dividend	Indicated Common Equity Cos
Proxy Group of Nine Water Companies	Yield (1)	EPS (2)	Rate in EPS	Rate in EPS	EPS	EPS (3)	Yield (4)	Rate (5)
American States Water Co. American Water Works Co., Inc. Aqua America, Inc. Artesian Resources Corp. California Water Service Group	2.87 % 2.69 2.56 3.64 2.84	7.00 % 8.50 10.00 NA 7.00	1.00 % 8.90 7.40 NA NA	2.00 % 7.20 5.60 NA 6.00	1.00 % 6.90 5.80 4.00 6.00	2.75 % 7.88 7.20 4.00 6.33	2.91 % 2.80 2.65 3.71 2.93	5.66 % 10.68 9.85 7.71 9.26
Connecticut Water Service, Inc. Middlesex Water Company SJW Corporation York Water Company	2.90 3.61 2.57 2.66	6.50 4.00 7.50 6.50	NA NA NA NA	5.00 NA NA NA	5.00 2.70 14.00 4.90	5.50 3.35 10.75 5.70	2.98 3.67 2.71 2.74	8.48 7.02 13.46 <u>8.44</u>
Average								<u>8.95</u> %
Median								8.48 %

NA= Not Available NMF = Not Meaningful Figure

Notes:

- Indicated dividend at 02/04/2014 divided by the average closing price of the last 60 trading days ending 02/04/2014 for each company.
- (2) From pages 3 through 11 of this Schedule.
- (3) Average of columns 2 through 5 excluding negative growth rates.
- (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 6) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for American States Water Co., 2.87% x (1+(1/2 x 2.75%)) = 2.91%.
- (5) Column 6 + column 7.

Source of Information:

Value Line Investment Survey www.reuters.com Downloaded on 02/05/2014 www.zacks.com Downloaded on 02/05/2014 www.yahoo.com Downloaded on 02/05/2014

Exhibit No. Schedule PMA-8 Rebuttal

																			Page	3 OT 3	4
AM	ER. S	STA	TES	WAT	ER N	IYSE-A	WR P	ecent Rice	28.1	5 P/E RATIO	• 18 .	5 (Traili Media	ng: 17.9) an: 22.0)	RELATIVI P/E RATI	0.9	9 DIV'D YLD	3.1	%	'ALUI LINE	Ξ	
TIMELIN	ess 3	Lowered	8/16/13	High: Low:	14.5 10.1	14.5 10.8	13.4 10.4	17.3 12.2	21.9 15.1	23.1 16.8	21.0 13.5	19.4 14.9	19.8 15.6	18.2 15.3	24.1 17.0	33.1 24.0			Target	Price	Range
SAFETY	2	Raised 7	/20/12	LEGEN	NDS 25 x Divide	ends p sh						_							2010	2017	2010
TECHNI		Raised 1	/10/14	div Re	vided by In elative Pric	iterest Rate e Strength															
BETA .6	6-18 PR	OJECTIC	ONS	3-tor-2 sp 2-for-1 sp Options	olit 6/02 olit 9/13 Ves										\sim	2-fo	r-1				
F	rice	Ai Gain	nn'l Total Return	Shaded	areas indi	cate reces	sions														30
High Low	40 (+ 30 (+	⊦40%) (+5%)	12% 5%						th	ա. իկ											25 20
Insider	Decisi	ions			ير ال			սել	ղողութ			n nininininininininininininininininini kata kata kata kata kata kata kata kat	երրին	որսկու							15
to Buy	F W A 0 0 0	2 1 0	0 1 0	IIII IIIIIIIII	the fifther	Uu. uu	արո														10
to Sell		$\frac{\overline{5}}{5}$ $\frac{\overline{5}}{5}$ $\frac{\overline{0}}{0}$	000			•••••				.	· ·	•				1		% тот	RETUR	N 12/13	7.5
msutu	102013	202013	3Q2013	Percen	t 12 -	•••	••••••	········		╍┥ _{┥┥╽┥} ╿╿╿╿		<u> `•</u>						1.vr	THIS V STOCK	INDEX	_
to Buy to Sell	93 59 24064	98 70	72 90 22052	shares traded	8 - 4 -	Itauttin								╆┿┿┿┿	°≑÷∔° ·····			3 yr.	82.5 102.2	52.8 211.8	F
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	©VALU	JE LINE PI	JB. LLC	16-18
5.72	5.51	6.45	6.08	6.53	6.89	6.99	6.81	7.03	7.88	8.75	9.21	9.74	10.71	11.12	12.12	12.20	12.50	Revenue	s per sh	. h	13.50
.92	.54	.60	.64	.67	.67	.39	.53	.66	.67	.81	.78	.81	1.11	1.12	2.40 1.41	2.50	1.60	Earnings	spersh /	A I	2.95 1.80
.42	.42	.43	.43	.43	.44	.44	.44	.45	.46	.48	.50	.51	.52	.55	.64	.76	.84	Div'd De	cl'd per s	h ^B ∎	1.00
5.62	1.50 5.74	5.91	6.37	6.61	7.02	6.98	7.51	7.86	8.32	8.77	2.23 8.97	2.09 9.70	10.13	10.84	11.80	2.30	13.25	Book Va	enaing pe lue per st	ersn 1	2.50 16.25
26.87	26.87	26.87	30.24	30.24	30.36	30.42	33.50	33.60	34.10	34.46	34.60	37.06	37.26	37.70	38.53	39.00	40.00	Common	n Shs Out	st'g ^C	43.00
14.5	15.5 .81	.97	15.9	.86	18.3	1.82	1.23	1.17	1.50	1.27	1.36	21.2	15.7	15.4	14.3 .91	18.4		Avg Ann Relative	P/E Ratio	10	19.5 1.30
5.5%	5.0%	4.2%	4.2%	3.9%	3.6%	3.5%	3.6%	3.1%	2.5%	2.5%	2.9%	2.9%	3.0%	3.2%	3.1%	2.7%		Avg Ann	'l Div'd Yi	ield	3.1%
CAPITA Total De	L STRU	CTURE a	as of 9/30 Due in 5 \)/13 Yrs \$10 6	mill	212.7	228.0	236.2	268.6	301.4	318.7	361.0	398.9	419.3	466.9	475	500	Revenue	es (\$mill)		580 77 0
LT Debt	\$332.1 i	mill. L	T Interes	st \$16.0 n	nill.	43.5%	37.4%	47.0%	40.5%	42.6%	37.8%	38.9%	43.2%	41.7%	39.9%	38.0%	40.0%	Income 1	Tax Rate		40.0%
coverag	est eann e: 4.9x)	eu. 5.2X.		(41% 0	f Cap'l)	 52.0%			12.2%	8.5%	6.9%	3.2%	5.8%	2.0%	2.5%	2.5%	2.5%	AFUDC 9	% to Net F	Profit	2.5%
Leases, Pensior	Uncapil Assets	talized: /	Annual re 107.6 mill	ntals \$3.0) mill.	52.0% 48.0%	52.3%	50.4% 49.6%	40.0% 51.4%	40.9% 53.1%	40.2% 53.8%	45.9% 54.1%	44.3% 55.7%	45.4%	42.2% 57.8%	40.5% 59.5%	40.0% 60.0%	Commor	n Equity R	latio	41.0% 59.0%
Pfd Sto	:k None.	. (Oblig. \$1	63.2 mill.		442.3	480.4	532.5	551.6	569.4	577.0	665.0	677.4	749.1	787.0	825	880	Total Ca	pital (\$mi	II)	1200
Commo	n Stock	38 717 5	540 she			4.6%	5.2%	5.4%	6.0%	6.7%	6.4%	5.9%	7.6%	7.1%	8.3%	8.0%	8.0%	Return o	n Total C	ap'l	7.5%
as of 11	/1/13	50,717,5				5.6%	6.6%	8.5%	8.1%	9.3%	8.6%	8.2%	11.0%	10.3%	11.9%	12.0%	12.5%	Return o	n Shr. Eq	uity	11.5%
MARKE	T CAP:	\$1.1 billi	on (Mid (Cap)		NMF	1.0%	2.8%	2.7%	9.3% 3.9%	3.1%	3.2%	5.8%	5.3%	6.6%	6.0%	6.0%	Retained	to Com I	Eq	5.0%
CURRE (\$MIL	NT POSI .L.)	ITION	2011	2012	9/30/13	113%	84%	67%	67%	58%	64%	61%	47%	49%	45%	49%	53%	All Div'd	s to Net F	Prof	56%
Cash A Other	ssets	1	1.3 164.3	23.5 160.5	26.2 176.4	BUSIN compa	ESS: Ar nv. Thro	nerican S ugh its i	States W principal	ater Co. subsidiar	operate v. Golde	s as a en State	holding Water	ers in t County.	he city c Sold Ch	of Big Be aparral (ear Lake City Wate	and in a of Arizo	areas of ona (6/11	San Ber). Has 7	nardino 28 em-
Current Accts P	Assets avable	1	165.6 37.9	184.0 40.6	202.6	Company, it supplies water to more than 250,000 customers in 75 communities in 10 counties. Service arcost include the strater						ployees	Officers	s'& dire	ctors ow	n 2.9% (of comm	on stock	(4/12		
Debt Du Other	ie		.3 66.2	3.3 49.8	3.4 49.4	metropolitan areas of Los Angeles and Orange Counties. The com-						Sprowls	. Inc: C/	A. Addr:	630 Eas	t Foothill	Bouleva	rd, San	Dimas,		
Current	Liab.	1	104.4	93.7	115.7	pany a	lso provi	des elect	ric utility s	services i	to nearly	23,250 c	custom-	CA 917	73. Tel: 9	909-394-3	3600. Inte	ernet: ww	w.aswate	r.com.	afita
ANNUA	L RATES	S Past	Pa	st Est'd	400 %	utili	ity b	i Sta usine	tes v ss pi	vater robab	s coi oly ju	re wa 1st c	ater om-	from	opei this	sector	s. inc	ieea, 1 grov	annua v to a	ai pr s hig	h as
of change Revenue	e (per sh) es	10 Yrs. 5.5	. 5Yı % 7.	rs. to 5%	' 16-'18 3.0%	plet	ed a	a hi	ghly	pro	fitab	e 2	013.	\$0.50	a sh	are o	ver th	e nex	t thre	e- to	five-
Cash F	Flow" s	6.5 6.5	% 9. % 11.	0% 5%	4.5% 7.0%	Gate	e Wat	er's o	contrib	oution	to s	share	net	Fina	nces	are h	ealth	y. Int	ernall	y gen	era-
Dividen	ds alue	3.0 5.0	1% 4. 1% 5.	5% 1 5%	0.0% 7.0%	rose	rose a whopping 28%. This occurred								funds	shou	ld be s' con	e suffi	icient ion h	to c udget	over for
Cal-	QUAR	TERLY RE	EVENUES (\$ mill.)	Full	chased water costs and a smaller contribu-							bu- the foreseeable future. As a result,						we		
endar 2010	88.4	95.5	5ep. 30 111.3	103.7	Year 398.9	tion ness	from The	the o	compa enses	ny's 1 were	nonuti more	lity t than	ousi-	think tal r	that atio	the should	strong 1 rem	g equit ain a	ty-to-t	otal (/erv s	capi- solid
2011	94.3	109.8	119.9	95.3	419.3	set	by in	crease	d rev	enue	resul	ting f	from	57%.	Refle	ecting	this	is the	comp	any's	Fi-
2012	1107.0	120.7	130.9	112.9	400.9	We a	mpler are re	nenta e lativ	tion oi elv bi	ullish	er rate on A	es. A meri	can	est g	rade o	rengti of anv	n ratii watei	ng of a r utilit	an A, IV.	the r	ngn-
2014	115	125 PNINCS 1	140	120 F A	500	Stat	es' no	nuti	lity b	usine	ss. Th	ie con	npa-	The	com	pany	's lo	ng-te	řm (divid	end
Cal- endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	milit	ary b	ases	ater s throug	ystem gh its	ASU:	nme S sub	0.5. sidi-	The of	equity	r ospe 's yie	ld is o	close t	o the	as v	ven. 1 for
2010	.23	.24	.31	.33	1.11	ary.	Ther	e is	ongoi	ng de	ebate	on V	Wall	the v	vater	utility	y grou	ip. Ho	wever	, its o	divi-
2012	.27	.40	.49	.26	1.41	secto	or. Soi	ne fee	el that	the c	ompa	ny's e	arn-	2016	2018	are s	signifi	cantly	abov	e the	e in-
2013 2014	.35 .33	.43 .42	.53 .55	.24 .30	1.55	ings	peak	ed in	2012	when	n the	y con	trib-	dustr	y ave	erage.	Thus	, inve high	stors	curre	ntly for
Cal-	QUAR	TERLY DIV	/IDENDS P	AID B	Full	line.	We a	re on	the ot	her si	ide of	this a	irgu-	the s	tock a	as the	ey as	l to in	the pre	past.	And,
endar 2010	Mar.31	Jun.30	Sep.30	Dec.31	Year 52	men	t. Am	erican hese o	State	es' lon	g exp vill er	erienc able	e in it to	while	e the	e noi he co	nutilit mnan	y op v's ea	eratio	ns l s pre	nave edic-
2011	.13	.14	.14	.14	.52	win	more	bids	from	army	base	s thro	bugh	tabili	ty co	mpare	ed to	its p	eers,	weit	hink
2012 2013	.14 .1775	.14 .1775	.1775	.1775 .2025	.64 .76	2016 utili	-2018 tv is i	, in o nyolva	ur op ed in f	inion. the hi	Curr dding	ently, for 10	the 0 in-	the s basis	tock i	s still	attra	ctive o	on a ri	isk-re	turn
2014		2013.1775.1775.2025.2025.76utility is involved in the bidding for 10 in- stallations that are looking to outsourceJames A. FloodJanuary 17											y 17,	2014							

(A) Primary earnings. Excludes nonrecurring due to rounding. gains/(losses): '04, 7¢; '05, 13¢; '06, 3¢; '08, (B) Dividends historically paid in early March, (14¢); '10, (23¢) '11, 10¢. Next earnings report due early February. Quarterly egs. may not add vertice of the material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.



James A. Flood
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AM	ERIC	CAN	WAT	ER N	YSE-	WK	R P	ecent Rice	41.7	1 P/E RATI	• 18.	1 (Traili Medi	ing: 20.5) an: NMF)	RELATIV P/E RATI	6 0.9	7 DIV'D YLD	2.8	% VAL	UE	
TIMELI	vess 3	Raised 10	0/4/13							High:	23.7	23.0	25.8	32.8	39.4	45.1		Tar	get Price	Range
SAFET	7 3	New 7/25	108	LEGE	NDS		<u> </u>			LOW.	10.5	10.2	19.4	20.2	51.5	37.0		20	16 2017	2018
TECHN	ICAI 3	Blowered	8/9/13	1.0 div	00 x Divide vided by In	ends p sh terest Rate	. –													80
BETA .	65 (1.00 =	Market)	0///10	Options:	elative Pric Yes	e Strength														60
201	6-18 PR	OJECTIC	DNS	Shaded	areas indi	cate recess	sions								\sim		•-			- 50
	Price	Ar Gain	nn'l Total Return												րուրու		-			30
High	65 (-	+55%)	17%								aluta			and a					_	
Inside	40 (· r Decis	+10%) ions	5%									1 Internation								15
monae	FMA	MJJ	ASO																	- 15
to Buy Options	000	000	0 0 0									•••								10
to Sell	0 8 0	300	0 0 0								**.*	•••			*******	****************		% TOT. RET	URN 12/13	7.5
Institu	102013	202013	1S 302013										••••	******				THIS	VL ARITH.' INDEX	
to Buy	191	165	197	shares	t 21 - 14 -									սևև				1 yr. 16.1	38.4	F
to Sell Hid's(000)	186 145912	209 144834	176 144172	traded	7 -													5 yr. 139.0	211.8	Τ
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006 ^E	2007	2008	2009	2010	2011	2012	2013	2014	© VALUE LIN	E PUB. LLC	16-18
									13.08	13.84	14.61	13.98	15.49	15.18	16.25	16.15	17.20	Revenues per	sh	20.00
									.65	d.47	2.87	2.89	3.56	3.73	4.27	4.45	4.70	"Cash Flow"	bersh	5.25
									0.97	02.14	1.10	1.25	1.53	01	2.11	1.06	2.40	Earnings per Div'd Decl'd r	oreh B∎	2.90
									4.31	4.74	6.31	4.50	4.38	5.27	5.25	5.15	5.50	Cap'l Spendir	a per sh	5.50
									23.86	28.39	25.64	22.91	23.59	24.11	25.10	26.15	27.50	Book Value p	ersh D	31.85
									160.00	160.00	160.00	174.63	175.00	175.66	176.99	178.50	180.00	Common Shs	Outst'g ^C	185.00
											18.9	15.6	14.6	16.8	16.7	18.6		Avg Ann'l P/E	Ratio	18.5
											1.14	1.04	.93	1.05	1.07	1.04		Relative P/E F	atio d Viold	1.25
											1.9%	4.2%	3.0%	3.1%	2.1%	2.0%	0400	Avg Ann i Div		2.1%
Total D	AL SIRU ebt \$567	72 mil D	is of 9/30 Due in 5 \	//13 Yrs \$1034	4 0 mil				2093.1 d155.8	2214.2 d242.2	2336.9	2440.7	2/10.7	2666.2	28/6.9	2885	3100	Revenues (\$n	ill) illy	3/00
LT Deb	t \$5174.1	mil. L	T Interes	st \$301.0	mil.						37.4%	37.9%	40.4%	39.5%	40.7%	38.5%	38.0%	Income Tax R	ate	38.0%
(Total ir	nterest co	verage: 4	1.4x)	(53% o	f Cap'l)									12.5%	6.2%	4.0%	8.0%	AFUDC % to N	let Profit	8.0%
Leases	, Uncapi	talized: A	Annual re	ntals \$28.	.1 mill.				56.1%	50.9%	53.1%	56.9%	56.8%	55.7%	53.8%	52.5%	52.0%	Long-Term De	bt Ratio	51.5%
Pensio	n Assets	\$1157.7	7 mill	621.2 mill	1				43.9%	49.1%	46.9%	43.1%	43.2%	44.2%	46.0%	47.5%	48.0%	Common Equ	ty Ratio	48.5%
Pfd Sto	ck \$17.6	mill. F	ong. on fd Div'd	\$.7 mill					8692.8	9245.7	8750.2	9289.0	9561.3	9580.3	9652.7	9880	10400	Iotal Capital (\$mill) IIV	12200
	~ .		407 1						NMF	NMF	37%	3.8%	4 4%	4.8%	5.5%	5.5%	5.5%	Return on Tot	ii) al Can'l	6.0%
as of 10	on Stock 0/31/13	178,274,	197 sns.						NMF	NMF	4.6%	5.2%	6.5%	7.2%	8.4%	8.5%	8.5%	Return on Shi	Equity	9.0%
									NMF	NMF	4.6%	5.2%	6.5%	7.2%	8.4%	8.3%	8.5%	Return on Cor	n Equity	9.0%
MARKE	T CAP:	\$7.4 billi	on (Larg	e Cap)					NMF	NMF	3.0%	1.8%	2.8%	3.5%	4.6%	4.5%	4.5%	Retained to C	om Eq	4.5%
CURRE (\$MI	INT POS	ITION	2011	2012	9/30/13						34%	65%	56%	52%	45%	48%	50%	All Div'ds to N	et Prof	48%
Cash A	ssets	13	14.2	24.4	32.4	BUSIN	ESS: Am	nerican V	Vater Wo	rks Com	pany, In	c. is the	largest	account	ting for 2	2.2% of	revenues	. Has roughly	7,000 em	ployees.
Curren	t Assets	13	97.7 -	499.4	613.2	service	s to over	14 millio	n people	in over 3	ity in the 0 states	and Can	ada. It's	commo	ation rate	e, 2.6% I outstandi	1 12. Bia na. Off.	& dir. own le	owns 10.3 ess than 1	% 01 the
Accts F	Payable	2	43.7	279.6	209.8	nonreg	ulated b	usiness	assists r	nunicipali	ties and	military	bases	Proxy).	Presider	nt & CEO	; Jeffry S	Sterba. Chairn	an; Georg	e Mack-
Other	ue	7	01.5	329.3	428.6	with th	e mainte	nance a	nd upkee	ep as we	II. Regul	lated ope	erations	enzie. A	Address:	1025 Lau	rel Oak	Road, Voorhee	es, NJ 0804	13. Tele-
Curren	t Liab.	14	89.1	994.8	1141.5	made t	10 89.1%	01 2012	revenues	. New Je	rsey is it	s biggesi	market	phone:	800-340-	8200. Int	emet: wv	/w.amwater.co	m.	
Fix. Ch	g. Cov.	2	56%	292%	300%	Ame	ericar	Wat	er Wo	rks d	warf	s mos	st of	For e	examp	ole, An	nerica	n Water	has red	uced
of chang	e (per sh)	5 Past 10 Yrs.	Ра 5 Үн	sí ⊏SťÓ rs. to '	'16-'12 '16-'18	wide	peers mai	. 111ê rgin	than	anv	of t	the of	oy a other	close	to 40	e rat % tod	av Tł	on 42% Ne compai	uu ∠U. ∖v g∩al	isto
Reveni	Jes Flow"		3.	0%	4.0% 5.5%	inve	stor-ov	wned	utilit	ies ir	ıclude	d in	the	redu	ce this	s figur	e to 3	5% over	the nex	t five
Earning	js				8.5%	indu	stry g	roup	follow	ed by	Value	e Line	. In-	year	perio	d. Ŭ				
Book V	ias 'alue		 1.	.5%	7.5% 4.5%	deed	$\frac{1}{2}$, the $\frac{1}{2}$	utility	alone	e accoi	unts f	or app	orox-	Exce	ellent	cost	cont	rois help	Amer	ican hing

deed, the utility alone accounts for approx-Excellent cost controls help American Water maintain good relationships with regulators. All utilities are exposed imately 50% of the entire industry when measured by market capitalization. Size matters in the water utility busito the risk of harsh treatment by state ness. Currently, the market is made up of authorities. By managing expenses so rigorously, the company has been able to considerably reduce the chance of this tens of thousands of small water utilities run by local municipalities. Due to financial pressures, most of these systems have not been properly maintained and are in happening. American Water offers good value vis-a-vis other water utilities. Historically, dire need of modernization. Thus, it is more advantageous for these smaller

water stocks with above-average dividend growth prospects have much lower current yields than similar water stocks with subpar dividend potential. (This is the premium that investors must pay for greater fu-ture cash flows.) In the recent past, the yield spreads between the high-and lowquality stocks has narrowed considerably. Thus, this is a good time to take positions in industry leaders such as American Water because they are cheap on a relative value basis. James A. Flood

January 17, 2014

(A) Diluted earnings. Excludes nonrecurring losses: '08, \$4.62; '09, \$2.63; '11, \$0.07. Dis-continued operations: '06, (4¢); '11, 3¢; '12, (10¢). Next earnings report due early February.

QUARTERLY REVENUES (\$ mill.)

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

786.9

760.9

831.8

829.2

900

.71

.73 .87

.84

1.00

.22 .22

.23 .25

.28 .28

671.2

668.8

745.6

724.3

EARNINGS PER SHARE A

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

QUARTERLY DIVIDENDS PAID B=

Mar.31 Jun.30 Sep.30 Dec.3

775

.42

.42

.66

57

.65

.21

.23 .23

.25

Cal-

endar

2010

2011

2012

2013

2014

Calendar

2010

2011

2012

2013

2014

Cal-

endar

2010

2011

2012

2013

2014

588.1

596.7

618.7

636.1

675

.18

.23 .28

.32

.35

.21

.22

.23

.25

664.5

639.8

680.8

695.4

750

.23

.32 .30

.47

.40

.23

.25

Full

Year

2710.7

2666.2

2876 9

2885

3100

Full Year

1.53

1.72

2.11

2.20

2.40

Full

Year

.86

.91

.96

1.06

each of the past two years.

 Quarterly earnings may not sum due to rounding. (B) Dividends paid in March, June, September, and December.
 Image: The section of the sectio

entities to sell their operations to concerns

that have both the financial wherewithal

and managerial experience required to ad-

dress the problems. American Water has

added almost 20 new acquisitions over

A decent amount of American Water's

profit growth comes from the success-

ful integration of acquisitions. With its

large infrastructure, the company has con-

sistently been able to reduce costs and squeeze efficiencies out of its purchases.

Company's Financial Strength Stock's Price Stability B+ 95 Price Growth Persistence Earnings Predictability 75 20

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																			Page	5 of 3	4
AQ	UA A	AME	RIC A		E-WTR		R P	ecent Rice	23.09	P/E Rati	o 19 .	9 (Traili Medi	ing: 20.6 an: 24.0)	RELATIVI P/E RATI	[€] 1.0	7 DIV'D YLD	2.8	8%	/ALUI LINE	Ξ	
TIMELIN	VESS 3	Lowered	5/24/13	High: Low:	12.0 7.7	13.4 9.5	14.8 11.3	23.4 14.0	23.8 16.1	21.3 15.1	17.6 9.8	17.2 12.3	18.4 13.2	19.0 15.4	21.5 16.8	28.1 20.6			Target 2016	Price	Range 2018
SAFET		Raised 4	/20/12	LEGEN	NDS 60 x Divide	ends p sh															64
BETA (ICAL 🕻	D Raised 1 = Market)	2/27/13	Re	vided by in elative Pric blit 12/01	e Strength	·									5-fo	or-4				48
201	6-18 PR	OJECTI		5-for-4 sp 4-for-3 sp	olit 12/03 olit 12/05			4	-for-3							\					32
	Price	Gain	Return	5-for-4 sp Options:	olit 9/13 Yes areas indi	cato rocoss	ions			- 10						,սորը հեր	•				24 20
Low	40 (· 25 (·	+75%) +10%)	17% 5%	Shaucu				1011 11. i	իրիս			ilp _{bilo}	սուրող	սոսիր	put'						16
Inside	r Decis FMA	ions M J J	ASO	<u>1</u> 11	וייו געשיין	m ^{ull}	100 Juli														12
to Buy Options	0 0 0 2 2 0	000	0 0 0 2 1 1	μ <u>ι</u>	<u> </u>				••••		•	•••									-8
to Sell	0 0 0 tional I	0 2 0	0 1 1 ns		•••••	••••••	••••••		*******	···		•••						% TOT	RETUR	N 12/13	_0
	1Q2013	2Q2013	3Q2013	Percen	t 15 –				<u> </u>	, IIIIIIII			•••••	•••••	••••	•••••••		1 vr	THIS V STOCK	INDEX	L
to Buy to Sell	136	141 130 82501	153 154 95172	shares traded	10 - 5 -		ululu.d		┟╴╷╫╶┼╷╖╫									3 yr.	42.1	52.8 211.8	-
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	© VALI	JE LINE P	JB. LLC	6-18
1.61	1.67	1.93	1.97	2.16	2.28	2.38	2.78	3.08	3.23	3.61	3.71	3.93	4.21	4.10	4.32	4.55	4.60	Revenue	es per sh		4.95
.45	.49	.58	.61	.69	./6	.//	.87	.97	1.01	1.10 57	1.14	1.29	1.42	1.45	1.51	1.85	1.95	"Cash F Earning	low" per : s per sh 4	sh N	1.85 1.45
.19	.20	.22	.23	.24	.26	.28	.29	.32	.35	.38	.41	.44	.47	.50	.54	.58	.64	Div'd De	cl'd per s	h ^B ∎	.86
.46	.65	.72	.93	.87	.96	1.06	1.23	1.47	1.64	1.43 5.85	1.58	1.66	1.89	1.90	1.98	1.90	1.90	Cap'l Sp Book Va	ending p lue ner sl	ersh	2.15 11 50
84.33	90.25	133.50	139.78	142.47	141.49	154.31	158.97	161.21	165.41	166.75	169.21	170.61	172.46	173.60	175.43	177.00	179.50	Commo	n Shs Out	sťg ^C	184.00
17.8	22.5	21.2	18.2	23.6	23.6	24.5	25.1	31.8	34.7	32.0	24.9	23.1	21.1	21.3	21.9	21.4		Avg Ann Beletive	I'l P/E Rat	io	22.5
3.9%	2.9%	3.0%	3.3%	2.5%	2.5%	2.5%	2.3%	1.8%	1.8%	2.1%	2.8%	3.1%	3.1%	2.8%	2.8%	2.4%		Avg Ann	'l Div'd Y	ield	2.6%
CAPITA	L STRU	CTURE a	as of 9/30)/13		367.2	442.0	496.8	533.5	602.5	627.0	670.5	726.1	712.0	757.8	770	825	Revenue	es (\$mill)		915
Total D	ebt \$163 t \$1439.3	60.5 mill. I 3 mill. I	Due in 5 ` _T Interes	Yrs \$368. st \$60.0 n	3 mill. nill.	67.3	80.0	91.2	92.0	95.0	97.9	104.4	124.0	144.8	153.1	200	225	Net Prof	it (\$mill)		265
(LT inte	rest earn	ed: 5.0x;	total inte	rest cover	rage: f Can'l)									2.9%	39.0%	1.5%	2.0%	AFUDC	% to Net F	Profit	40.0 <i>%</i> 2.0%
Pensio	n Assets	s-12/12 \$	190.1 mill	(01/00 . .		51.4%	50.0%	52.0%	51.6%	55.4%	54.1%	55.6%	56.6%	52.7%	52.7%	51.0%	51.0%	Long-Te	rm Debt F	latio	50.0%
Pfd Sto	ck None		0	blig. \$303	3.1 miii.	48.6%	50.0%	48.0%	48.4%	44.6% 2191.4	45.9%	44.4% 2495.5	43.4%	47.3% 2646.8	47.3%	49.0%	49.0% 3350	Total Ca	n Equity F pital (\$mi	(atio	50.0% 4230
Commo as of 10	on Stock)/24/13	176,709	,658 shar	res		1824.3	2069.8	2280.0	2506.0	2792.8	2997.4	3227.3	3469.3	3612.9	3936.2	4150	4350	Net Plan	t (\$mill)	,	4900
						6.4% 10.2%	6.7%	6.9%	6.4% 10.0%	5.9% 9.7%	5.7% 9.3%	5.6% 9.4%	5.9%	6.9%	6.6%	7.0%	6.0% 13.0%	Return o	n Total C n Shr. Eo	ap'l uitv	6.5% 12.5%
MARKE	T CAP:	\$4.1 billi	on (Mid (Cap)		10.2%	10.7%	11.2%	10.0%	9.7%	9.3%	9.4%	10.6%	11.6%	11.0%	13.0%	13.0%	Return o	n Com E	quity	12.5%
CURRE (\$MI	NT POS	ITION	2011	2012	9/30/13	4.2%	4.6%	4.9%	3.7%	3.2% 67%	2.8%	2.7%	3.7%	4.6%	4.3%	6.5% 50%	6.0%	Retained	I to Com I	Eq	5.0% 50%
Cash A	sséts. ables		8.2 81.1	5.5 92.9	6.4 98.3	BUSIN	ESS: Ag	ua Amer	ica Inc is	the ho	olding cor	mpany fo	or water	& other	23.4%	Officers	and dire	ectors on	n 14%	of the c	ommon
Invento Other	ry (Avg	Cst)	11.2 220.0	11.8 150.7	12.4 94.5	and wa	stewater	utilities	that serve	approxi	mately th	ree millio	on resi-	stock; I	Blackrock	(, Inc, 6	6.3%; Sta	ate Stree	t Capita	Corp.,	5.7%;
Current	t Assets		320.5	260.9	211.6	Jersey,	Florida	yivania, a, India	na, and	five of	other st	ates. A	cquired	Officer:	Nicholas	s DeBer	edictis.	ky). Chai Incorpora	ted: Per	insylvani	a. Ad-
Debt D	ue		80.4	125.4	191.2	AquaSo	ource, 7/ enues '1	03; Cons 2 [.] reside	umers Wat	ter, 4/99 %: com	ercial 1	ners. Wat 6 1% [,] in	ter sup- dustrial	dress: 19010	762 Wes Telephon	st Lanca	aster Ave 25-1400	enue, Bry Internet	/n Mawr www.agu	, Penns Jaameric	ylvania a com
Current	t Liab.		425.7	274.2	318.3	Aau	a Am		has o	exite	d the	e Flo	rida	the 1	use of	fa"	repair	tax	deduc	tion".	we
ANNUA	g. Cov.	S Past	367% Pa	398% st Est'd	398%	mar	ket. I	in five	separ	ate t	ransa	tions	, the	think	the	compa	any po	osted	a gair	in s	hare
of change	e (per sh)	10 Yrs	. 5 Yi	rs. to	'16-'18 2 5%	Suns	ty sol shine	d off State	all of 1 for a	its oj total	of S9	ons ir 10 mil	i the llion.	net o perha	f over aps. v	vould	last y	ear. N 1e uti	1ore 11 litv's	mpres abilit	sive
"Cash	Flow"	8.5	% 8. % 4	0%	4.0%	This	will	allow	the c	ompa	any to	focu	s its	top la	ast ye	ar's e	xcepti	ional g	gain b	y 9%	this
Divider	ids alue	7.5	5% 8. 1% 7	.0%	9.5% 8.0%	atter	ntion ts are	in the	e state entrate	swh d.	iere n	10ST 0	of its	year. tion	Most of cos	of thi t redu	is will uction	be du s and	the i	comt mpler	nen-
Cal-		TERLY RE	EVENUES	(\$ mill.)	Full	Gro	wth	thro	ough	acq	uisiti	on	will	tatio	n of	highe	er rat	tes in	nplem	ented	by
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	stra	aın a tegv.	i key Aqua	stone purcha	or t ased	he c 13 uti	o mpa ilities	ny s last	state Hvd	regui r auli o	ators.	ackin	ng r	orovio	les	op-
2010	160.5	178.5 178.3	207.8 197.3	179.3 172.7	726.1	year	and	18 ¹ in	2012.	We	think	that	this	port	unitie	es fo	r Aq	ua's	nonr	egula	ted
2012	164.0	191.7	214.6	187.5	757.8	num ahea	ber w d. Tł	nat's l	ually 1 because	ncrea e the	ase in U.S.	the y	ears	earn copio	i ngs. us am	This	drillir s of wa	ig tecl ater. A	nnique Agua l	e requ nas er	ures iter-
2013	180.0 190	195.7 215	204.3 225	200	830	lated	l with	thou	sands o	of sm	all m	ınicip	ally-	ed in	to a j	joint	ventu	re on	a pip	eline	that
Cal-	E/	ARNINGS	PER SHAR	EA Dua 24	Full	acros	ea w ss the	ater e coui	utiliti ntrv a	es. re st	Becau ruggli	ise c ing fi	nan-	elimi	bring	g wat g the	er di	rectly d for	to t thou	ne w Isands	ells, s of
endar 2010	Mar.31	Jun.30	26	Dec.31	Year .72	cially	y, the	y are	havin	g tr	ouble	finan	cing	truck	s lade	en wit	th wat	ter cho	oking	the st	reet
2011	.18	.22	.24	.19	.83	frast	costs o ructu	of repa res. M	airing † Ianv ar	their re fin	agıng ding i	, wate t easi	er in-	runn	c in P ing, w	ennsy /e thi	nk th	a. wh at this	en ful	add a	and bout
2012	.15	.24 .30	.29 .36	.19 .23	.8/ 1.15	sell	their	oper	ations	tol	larger	inve	stor-	\$0.10) a sha	are to	the b	ottom	line.		
2014	.25	.32	.40	.28	1.25	owne whei	ea cor rewith	npani 1al to	es tha fund th	ι nav ne ne	ve the eded (a nnai capita	l ex-	Aqua othe	a stoc r wai	ck is ter u	attra tilitie	s. Wh	com ile th	p are e vie	i to ld is
Cal- endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year	pend	litures	s. Mo	reover,	Aqu	ia car	ı run	the	marg	inally	lowe	r that	n the	group	aver	age,
2010	.116	.116	.116	.124	.47	oper man	ations ageme	ata ente:	much spertise	iowe e an	er cost d eco	usin nomie	g its s of	this stron	is mo g div	ore th idend	ian of	uset l th pr	oy the	e equ s. Th	itys ere-
2011 2012	.124 .132	.124 .132	.124 .132	.132 .14	.50 .54	scale		1 6 11						fore,	conse	ervati	ve, ir	icome	seeki	ng in	ves-
2013	.14	.14	.152	.152	.58	Aqu a so	a wil lid 2	i tolla 014. i	ow up in our	a sti • opi	rong 2 nion.	Aide X	with d bv	tors 1 Jame	inight es A. I	rina 1 Flood	inese	snares	s of in <i>anuar</i>	terest y <i>17</i> .	2014
(A) Dilute	ed egs. E	Excl. non	rec. gains	(losses):	earn	ings repo	ort due ea	arly Febru	uary.	•	(C) In mi	llions, ad	justed for	stock sp	lits.	Co	mpany's	Financia	I Strengt	h	B++

(A) Diluted egs. Excl. nonrec. gains (losses):
 (93, 196); '00, 2¢; '01, 2¢; '03, 3¢; '12, '(B) Dividends historically paid in early March, June, Sept. & Dec.

 Dividends historically paid in early March, June, Sept. & Dec.
 Dividends historically paid in early March, June, Sept. & Dec.
 Dividends historically paid in early March, June, Sept. & Dec.
 Dividends historically paid in early March, June, Sept. & Dec.
 Dividends historically paid in early March, June, Sept. & Dec.

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5	,
Company's Financial Strength	B++
Stock's Price Stability	100
Price Growth Persistence	70
Earnings Predictability	100
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													Pa	ge 6 of 34
ARTE	SIA	N R	ES. (COR	P. 1	NDQartn/	A RE PR	ICE 23.	70 TRAILIN	lio 24.7	P/E RATIO 1.2	1 PIV'D 3	.5% VA	LUE NE
	RANI	KS		22 17	2.62 7.20	22.33 17.90	20.67 18.26	19.31 13.00	18.73 12.81	19.5 16.4	59 19.99 13 15.16	24.43 18.20	24.27 21.52	High Low
PERFORMA	ANCE	3 Av	rerage		LEGE	INDS							<u></u>	•
Technical		3 AV	rerage		12 Mo Rel Pri	s Mov Avg	╸╡╡╵╵╏╻╻╻╻╻			111111111111	·+++++++++++++++++++++++++++++++++++++			18
SAFETY		3 AV	erage	Shaded	area ind	licates recession		•						13
BETA .55		(1.00 = N	Market)			· ·	•••	•••••	· · ·					8
		(,				· · · · ·	· ·	· · ·	•••••••	•			5
Financial St	ronath		в								•••••	••••	••••••	4
Dries Ctabili	inengun i		05										••••	3
Price Stabili		• .	90											2
Price Growt	n Pers	istence	50										1 .	475
Earnings Pro	edictal	oility	85							$\frac{1}{10000000000000000000000000000000000$				VOL. (thous.)
© VALUE LI	INE PU	BLISHIN	NG LLC	200	5	2006	2007	2008	2009	2010	2011	2012	2013	2014/2015
SALES PER	SH			7.	52	7.77	7.20	7.59	8.11	8.48	7.56	8.10		
"CASH FLO	W" PE PER SI	R SH H		1.	56 81	1.75 97	1.57 90	1.65 86	1.84 97	1.92	1.64	2.04 1.13	 1.02 ^{A,B}	1.23 ^C /NA
DIV'DS DEC	L'D PE	R SH			58	.61	.66	.00	.72	.75	.76	.79		1120 /11/1
CAP'L SPEN		PER SH		3. o	35 60	5.08 10.15	3.66 11.66	6.09 11.86	2.32	2.57	1.83	2.36		
COMMON S		TST'G (MILL)	9. 6.	02	6.09	7.30	7.40	7.51	7.65	8.61	8.71		
AVG ANN'L	P/E RA			24.	2	20.3	21.5	20.1	16.4	18.2	22.5	18.3	23.2	19.3/NA
AVG ANN'L	DIV'D	YIELD		1.	28 9%	3.1%	3.4%	4.1%	4.5%	4.1%	4.1%	3.8%		
SALES (\$MI	ILL)			45.	3	47.3	52.5	56.2	60.9	64.9	65.1	70.6		Bold figures
DEPRECIAT	ION (\$	JIN MILL)		100.	0% 4	45.6%	45.6% 5.2	45.1%	46.9%	46.5%	<u>45.5%</u> 7.4	48.7%		are consensus earnings
NET PROFIT	T (\$MÌL	.L)		5.	0	6.1	6.3	6.4	7.3	7.6	6.7	9.8		estimates
NET PROFIT	X RATI T MAR(= GIN		39. 11.	9% 1%	39.0% 12.8%	39.8% 11.9%	40.8%	40.1%	40.0%	6 40.8% 6 10.4%	40.2% 14.0%		and, using the recent prices.
WORKING C	CAP'L (\$MILL)		d1.	8	d8.8	2.5	d20.9	d23.3	d27.9	d11.4	d11.4		P/E ratios.
LONG-TERN	M DEBT	「 (\$MILL)	.)	92. 57	4 8	92.1 61.8	91.8 85 1	107.6 87.8	106.0 91.2	105.1 95.1	106.5 113.0	106.3 118.2		
RETURN ON		L CAP'L	_	5.	3%	5.8%	5.3%	4.7%	5.2%	5.6%	6 4.6%	5.9%		
RETURN ON	N SHR.		1	8.	7% 7%	9.8%	7.4%	7.3%	8.0%	8.0%	6.0%	8.3%		
ALL DIV'DS	TO NE	T PROF	:	69%	/ /0	61%	71%	81%	74%	75%	92%	70%		
^A No. of analy	rsts char	nging earl	n. est. in la	ast 3 day	s: 0 up,	, 0 down, conse	nsus 5-year earr	nings growth not	available. ^B Ba	sed upon 3 an	alysts' estimates. C _E	Based upon 3 ar	nalysts' estimates	
	AN	NUAL R	ATES			ASSETS (\$m	nill.) 2	011 2012	9/30/13		INDU	STRY: Wa	ater Utility	
of change () Sales	per sha	are)	5 Yrs. 1.5%	1 7	Yr. .0%	Cash Assets Receivables		.3 .6 8.6 8.7	.6 8.8	BUSIN	ESS: Artesia	n Resource	es Corporati	on, through its
"Cash Flow Earnings	"		3.0% 2.0%	24 36	.0% .0%	Inventory		1.5 1.4	1.6	subsidia	ries, provides	water, was	stewater, and	l other services
Dividends Book Value			4.5%	4	.0%	Current Asse	ts 1	<u>2.9</u> <u>2.0</u> 3.3 13.5	14.7	on the D	elmarva Peni	nsula. It di	stributes and	d sells water to
			4.5 /0		.5%	Property Pla	nt			custome	rs in Delawar	al, industr e. Marvlai	nd, and Pen	nsvlvania. The
Year 1	IQ	2Q	3Q	4Q	Full Year	& Equip, a	it cost 43	5.0 454.4		company	y also offers	water for	r public an	d private fire
12/31/11 14	4.8	16.5	17.7	16.1	65.1	Net Property	35	7.6 370.6	378.2	protectio	on to customer	s in its ser	vice territori	es. In addition,
12/31/12 16 12/31/13 16	6.7 6.3	17.9 17.8	19.0 18.1	17.0	70.6	Other Total Assets	37	<u>7.8</u> <u>7.6</u> 8.7 <u>391.7</u>	<u>7.5</u> 400.4	and sew	er service lir	ne protecti	on plans, a	nd wastewater
12/31/14							(* 11)			manager	nent services,	as well as	s design, co	nstruction, and
Fiscal	EAR	NINGS P	PER SHA	RE	Full	Accts Payabl	(\$mili.) e	2.8 3.5	3.7	engineer	ing services.	As of Dec	ember 31, 2	2012, the com-
12/31/10 3	22	24	38	4Q	1 00	Debt Due Other	1	3.8 12.6 8.1 8.8	10.9 11.8	through	1,162 miles of	f transmiss	ion and dist	ribution mains.
12/31/11 .1	14	.23	.26	.20	.83	Current Liab	2	4.7 24.9	26.4	Has 229	employees. C	hairman, C	C.E.O. & Pre	sident: Dian C.
12/31/12 .2 12/31/13 1	28 19	.32 28	.33 29	.20 24	1.13					Taylor. A	Address: 664 (Churchman	is Rd., Newa	ark, DE 19702.
12/31/14	20	.34	.20			LONG-TERM	DEBT AND E	QUITY		http://ww	ww.artesianwa	ter.com.	5-0900.	internet.
Cal- Q	UARTE		VIDENDS	PAID	Full	as of 9/30	/13			1				
endar 1	10	2Q	30	4Q	Year	Total Debt \$ LT Debt \$10	116.6 mill. 5.7 mill.	Due in	5 Yrs. NA					
2011 .1	19	.19	.19	.203	.70	Including Ca	ip. Leases NA	(47	% of Cap'l)					J.V.
2013 .2 2014 .2	203	.206	.206	.209	.82	Leases, Unc	apitalized Ann	ual rentals NA	· · · · · · · · /		J	anuary 17,	2014	
IN	ISTITU	τιοναι	DECISIO	NS	I	Pension Lial	cility \$.4 mill. in	'12 vs. \$.5 mill.	in '11	TOTAL				
	1	Q'13	2Q'13	30	2'13	Pfd Stock No	ne	Pfd Div'd	I Paid None	IUIAL	SHAKEHULD	Dividend	NN Is plus appreciat	ion as of 12/31/2013
to Buy		32 26	31 30		30 27	Common Sto	ck 8,793,216 sh	ares		3 Mos.	6 Mos.	1 Yr.	3 Yrs	5 Yrs.
Hld's(000)	3	036	3029	30	33			(53	3% of Cap'l)	4.10%	4.92%	6.13%	35.96%	6 76.91%

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Exhibit No. Schedule PMA-8 Rebuttal **D** -7 . 6 . 7 /

																			гаус	1013	+
C 1		DNI	A W/)	_	R	ECENT	22 A	7 P/E	. 20	/ Traili	ng: 22.9	RELATIV	11		20	0/ V	'ALUI		
		NIN	A W		NYS	E-CWT	P	RICE	22.4	RATI	0 ZU. (Medi	an: 21.0 /	P/E RATI			J.U	//0	LINE		
TIMELIN	iess 3	Raised 1	1/1/13	High:	13.4	15.7	19.0	21.1	22.9	22.7	23.3	24.1	19.8	19.4	19.3	23.4			Target	Price	Range
SAFET	1 3	Lowered	7/27/07	LOW:		11.0		15.0	10.4	17.1	13.0	10.7	16.9	10.7	10.0	10.4			2016	2017	2018
TECHN		Daicod 1	/17/14	1. di	33 x Divide	ends p sh iterest Rate	. –														64
BETA .	60 (1.00 =	= Market)	/1//14	2-for-1 sr	elative Pric	e Strength															48
201	6-18 PR	OJECTI	ONS	Options:	Yes areas indi	cate recess	ions							2-for-1		<u></u>					32
	Prico	A Gain	nn'l Total									-					•				_24
High	35 (+55%)	15%	-					րորհուլ	111 IIII	الالالالي	ա _{րուն}	ակես		ստութ	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	-				-20 16
Low	25 (· r Decis	+10%) ions	7%	الأساليا	աստ	արդու	արթու				.,										12
manac	FMA	MJJ	ASO									•••									
to Buy	0200	0 0 0	0 1 0			•••••				_	•	•									-8
to Sell	0 0 0	0 0 0	0 0 0	° <u>° °</u> *** '	*****	•••,	·····	**************************************	*******	••••	••••							% тот	RETUR	N 12/13	-0
Institu	tional I	Decisio	ns		1					•••	<u>ار آر ا</u>		••••••••	• • • • • • • • • • • •	•••••				THIS V	L ARITH."	
to Buy	86	202013	5u2015 60	Percen shares	t 18 – 12 –					. 1111.1			. de La	La Lat.	hh.			1 yr.	29.7	38.4	-
to Sell HId's(000)	39 26409	57 26677	51 27841	traded	6 -	սուսին	ասհա	luuliu										3 yr. 5 yr.	36.8 16.9	52.8 211.8	-
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	© VALL	je line pi	JB. LLC 1	6-18
7.74	7.38	7.98	8.08	8.13	8.67	8.18	8.59	8.72	8.10	8.88	9.90	10.82	11.05	12.00	13.34	12.15	13.15	Revenue	s per sh		16.00
1.46	1.30	1.37	1.26	1.10	1.32	1.26	1.42	1.52	1.36	1.56	1.86	1.93	1.93	2.07	2.32	2.20	2.50	"Cash Fl	ow" per s	sh	2.85
.92	.73	.77	.66	.47	.63	.61	.73	.74	.67	.75	.95	.98	.91	.86	1.02	.95	1.15	Earnings	spersh /		1.40
1 20	.54	1.54	1.55	.56	.56	.56	.5/ 1 97	.5/	.58	.58	.59	.59	.60	.62 2 92	.63	.64 2 //5	.68 2 25	DIV'O De Can'l Sn	u a per s ending re	n ¤∎ arsh	.90
6.50	6 69	6.71	6 45	6.48	6.56	7.22	7.83	7.90	9.07	9.25	9.72	10.13	10.45	10.76	11 28	12.45	12.85	Book Va	lue per st		14.75
25.24	25.24	25.87	30.29	30.36	30.36	33.86	36.73	36.78	41.31	41.33	41.45	41.53	41.67	41.82	41.98	47.75	48.00	Commor	Shs Out	sťg D	50.0
12.6	17.8	17.8	19.6	27.1	19.8	22.1	20.1	24.9	29.2	26.1	19.8	19.7	20.3	21.3	17.9	21.6		Avg Ann	'I P/E Rat	io	22.0
.73	.93	1.01	1.27	1.39	1.08	1.26	1.06	1.33	1.58	1.39	1.19	1.31	1.29	1.34	1.14	1.44		Relative	P/E Ratio		1.45
4.6%	4.2%	4.0%	4.3%	4.4%	4.5%	4.2%	3.9%	3.1%	2.9%	3.0%	3.1%	3.1%	3.2%	3.4%	3.5%	3.1%		Avg Ann	'l Div'd Yi	eld	3.0%
CAPITA	L STRU	CTURE a	as of 9/30	0/13		277.1	315.6	320.7	334.7	367.1	410.3	449.4	460.4	501.8	560.0	580	630	Revenue	s (\$mill)	=	800
Total D	ebt \$489	.7 mill. I	Due in 5	Yrs \$65.3	mill.	19.4	26.0	27.2	25.6	31.2	39.8	40.6	37.7	36.1	42.6	45.0	55.0	Net Profi	t (\$mill)		70.0
LT Deb	\$430.2	mill. I	T Intere	st \$29.5 n	nill.	39.9%	39.6%	42.4%	37.4%	39.9%	37.7%	40.3%	39.5%	40.5%	37.5%	34.0%	39.0%	Income 1	ax Rate		39.0%
(LT inte	rest earn	ed: 6.7x;	total int.	cov.: 6.0x	() 	10.3%	3.2%	3.3%	10.6%	8.3%	8.0%	7.0%	4.2%	7.0%	8.0%	0.0%	8.5%	AFUDC 7	10 Net F	atio	10.0%
Pensio	1 Assets	-12/12 \$	4) 202 9 mil	2% of Ca	p'I)	49.1%	50.8%	40.3 %	43.3 % 55 9%	42.9%	58.4%	52.9%	47.6%	48.3%	52.2%	42.0%	44.0%	Common	Fauity R	atio	47.5% 52.5%
		, (Oblig. \$4	 02.9 mill.		498.4	565.9	568.1	670.1	674.9	690.4	794.9	914.7	931.5	908.2	1025	1100	Total Ca	oital (\$mi)	1400
Pfd Sto	ck None					759.5	800.3	862.7	941.5	1010.2	1112.4	1198.1	1294.3	1381.1	1457.1	1510	1565	Net Plan	t (\$mill)	'	1725
Commo	on Stock	47,739,	024 shs.			5.6%	6.1%	6.3%	5.2%	5.9%	7.1%	6.5%	5.5%	5.5%	6.3%	6.0%	6.5%	Return o	n Total C	ap'l	6.5%
as of 10)/31/13	,,				7.8%	8.9%	9.3%	6.8%	8.1%	9.9%	9.6%	8.6%	8.0%	9.0%	7.5%	9.0%	Return o	n Shr. Eq	uity	9.5%
MARKE	TCAP	\$1 1 hilli	on (Mid)	Can)		7.9%	9.0%	9.3%	6.8%	8.1%	9.9%	9.6%	8.6%	8.0%	9.0%	7.5%	9.0%	Return o	n Com Ed	uity	9.5%
CURRE	NT POS		2011	2012	9/30/13	01%	2.1%	Z.1%	1.0%	1.0%	3.0% 61%	3.0% 60%	3.0% 66%	2.3%	5.4% 62%	2.5%	3.5% 50%	All Div'de	to Com I	rof	3.3% 64%
(\$MI	LL.)		27.2	20.0	40.0	DUCIN	FSS . Co	lifornio M	lotor Son	ion Crow			od ond	brookdo	12/0	ragidantic			100/	hlia auth	orition
Other	sseis		27.2 86.7	38.8 107.8	48.8	nonreg	ulated w	ater serv	vater Serv	uahly 4	р ргочае 71.900 с	s regulat	in 83	4% ind	wn, rz: ustrial 4º	residentia %: other	al, 66%; i 8% '12	reported	deprecia	tion rate	2 8%
Current	Assets		113.9	146.6	170.6	commu	inities in	Californi	a, Washir	ngton, N	ew Mexic	o, and	Hawaii.	Has 1,1	31 empl	oyees. P	resident,	Chairma	in, and (Chief Exe	ecutive
Accts F	'ayable ue		48.9 53.7	46.8 136.3	60.4 59.5	Main s	ervice a	eas: Sar	Franciso	o Bay a	rea, Sac	ramento	Valley,	Officer:	Peter C.	Nelson.	Inc.: Dela	aware. Ac	dress: 1	720 Nort	h First
Other		_	49.3	59.7	77.1	Salinas	Rio Gra	San Joa nde Cor	aquin vaii n: West	ey & pa Hawaii l	Itilities (9/08) R	es. Ac-	Street, 8200 In	San Jos ternet: w	se, Califo ww.calwa	ornia 95 ateraroun	112-4598 0 com	. Telepr	one: 40	8-367-
Fix Ch	Liab.		151.9 278%	242.8	197.0 325%	A G			p, noor					0200.1	Comr			uld he	ovon	mono	im
	9.000.	S Past	Pa	st Fet'd	1'10-'12	Wat	nai a er Se	green rvice	Grou	etwe In ar	en C nd sta	allioi nte ra	ma som-	year.	ive if	f 201	lis wo R's re	uia pe sults	were	not	hol-
of change	(per sh)	10 Yrs	. 5 Ÿ	rs. to	16-118	lato	rs is	all bu	it fina	alized	I. Las	t qua	rter.	stere	d by a	\$0.09)-a-sh	are ta	x brea	ak.	501
Revenu "Cash	ies Flow"	4.0)% 7. % 7	.0% 5%	4.5% 5.0%	the	Califo	rnia F	Public	Utilit	y Con	ımissi	ion's	Calif	fornia	a Wat	er's	next	divid	lend	an-
Earning	ļs	5.0	% 5	.5%	7.0%	(CPU	JC) (Office	of R	atepa	yers	Advoc	ates	nour	iceme	ent co	ould	breal	c a lo	ong-te	erm
Book V	alue	5.0	v‰ 1.)% 4.	.5%	0.0% 5.5%		an reac	nounc	ea th	at a	settle	ment	nas	tren the c	a. Uv	er the	e pas	t five	and	10 ye	ars,
Cal-	QUAR	TERLY RF	VENUES (\$ mill.)⋿	Full	CPI		esn't l	have t	e นนไ กิฮก	along	with	the	1.5%	resn	i payo ective	lv le	s gruv vels t	hat v	1.070 vere 9	sub-
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	ORA	's dec	ision.	the ch	ances	of th	at ap	pear	stant	ially	below	that	of the	avera	age w	ater
2010	90.3	118.3	146.3	105.5	460.4	to be	virtu	ally n	il.		-		- _	utilit	y. <u></u> We	estir	nate	that y	when	the :	new
2011	98.1	131.4	169.3	103.0	501.8	The	deal	app	ears	to_be	e fair	to l	ooth	divid	end is	s anno	unce	i in th	e firs	t qua	rter,
2012	1110.0	143.0 154.6	170.1 184.4	121.5 129.6	580		torni		ter a	nd i	ts cu	stom	ers.	the h	ike ca	n be a	anywł b owi	nere fr	om 69	% to 9	%.
2014	130	160	200	140	630	HCC0	t Cal	iforni	ne ter a Wat₄	nns 0 ar wil	n une Ibe ⊲	arra awolle	nge- d to	form	e SIL	ares of late	nave The	broa	i sure d mai	ving] •ket a	ver-
Cal-	E/	RNINGS I	PER SHAR	ΕA	Full	incre	ease i	ts gro	ss rev	enues	by S4	45 mi	llion	ages	rose	shar	ply in	n last	year	's fo	urth
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	in 20)14, \$	10 mi	illion i	n 201	5, an	d \$10	mil-	quart	er. N	Not s	urpris	singly,	cons	ervat	ive,
2010	.05	.25	.49	.12	.91	lion	in 20	16. Iı	1 retu	rn, th	ne uti	lity w	ould	incon	ne-orio	ented	wa	ter	utility	st	ocks
2011	.03 03	.29	.50 56	.04 12	.86 1 02	be re	quire	d to i	nvest	\$321 1	millio	n in w	ater	lagge	d. Th	at is,	all t	out Ca	aliforr	na W	ater
2013	d.03	.28	.61	.09	.95	Syste 2013	201 IN	mastr Mor	eover	unpi shoul	uvem d the	utility	rom		view	on (ers. Califo	rnia	Wata	r cha	TAS
2014	.05	.35	.60	.15	1.15	vest	ana	dditio	nal \$1	26 m	illion	it w	ould	has	chan	ged f	or th	ie bei	ter.	Assun	ning
Cal-	QUAR	TERLY DI	IDENDS P	AID ^B =	Full	be g	rante	d ano	ther \$	19 m	illion	rate	hike	state	reg	ulator	s ren	nain f	air v	hen	the
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	ata	later	date.	The	CPUC	is e	xpecte	ed to	utilit	y see	ks hig	gher 1	rates	in thi	ree_ye	ears,
2010	.149	.149	.149	.149	.60	relea	se its	decis	ion ea	rly th	is yea	r.	12	we th	ink t	hat th	ie sto	ck, wł	ich h	as be	en a
2011	1575	.154 1575	.154 1575	.154 1575	.62	te "	expec	t the	com	pany in 🤊	S DOU	tom	une tho	majo	r und	er per	TORM	er ove	r the	past d tur	one-
2012	.16	.1575	.1575	.16	.63	impl	emen	uu III tation	of hi	un 20 Sher	rates	we ti	hink	solid	- and total	nve-y returr	is thr	ough \$	5, coui 2016-9	u tur 2018	
2014		-	-	-		Cali	fornia	's sha	re ne	t can	rise	21%	this	Jame	es A. I	Flood		J	anuar	y 17,	2014
	FPS F	xcl norr	ecurring	nain (loss). May	Aug		Div'd ro	investmen	t nlan la	(D) In mil	lione adi	iustad for	r splite		Con	nnanv'e	Financia	Stronge	, ., h	- B++
200 (14)	'01 2a	102 14.	11 10 N	Jovt oorn	, widy	, nuy., ai loblo	IG 110V.	Divuie	el	- pian		doc non	roa rov	opino.		Sto.	npany S ok'o Drio	- manula	. Jacingt		100

(A) Basic EPS. Excl. nonrecurring gain (loss):	May, Aug., and Nov. Div'd reinvestment plan	(D) In millions, adjusted for splits.	Company's Financial Strength	B++
'00, (4¢); '01, 2¢; '02, 4¢; '11, 4¢. Next earn-	available.	(E) Excludes non-reg. rev.	Stock's Price Stability	100
ings report due mid-February.	(C) Incl. intangible assets. In '12: \$18.8 mill.,		Price Growth Persistence	50
(B) Dividends historically paid in late Feb.,	\$0.44/sh.		Earnings Predictability	90
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			_																Page	0013	4
	NNE	CTIC	CUT	WAT		IDQ-CT	WS P	ecent Rice	35.0	9 P/E RATIO	19.	6 (Traili Medi	ng: 21.3 an: 23.0)	RELATIV P/E RATI	5 1.0	5 DIV'D YLD	2.8	8%	LINE		
TIMELI	VESS $\frac{2}{2}$	Raised 1	2/13/13	High: Low:	31.1 20.3	30.4 24.0	29.8 23.8	28.2 21.9	27.7 20.3	25.6 22.4	29.0 19.3	26.4 17.3	27.9 20.0	29.1 23.3	32.8 26.2	36.4 27.8			Target 2016	Price 2017	Range 2018
TECHN	r j Icai 3	New 1/18	3/13 12/27/13	LEGEI	NDS 30 x Divide vided bv In	ends p sh terest Rate				_											80
BETA .	75 (1.00 =	Market)	12121113	3-for-2 sp	elative Pric plit 9/01	e Strength				_					\frown						-60 50
201	6-18 PR	OJECTIO	ONS nn'i Total	Shaded	No areas indi	cate reces	sions			_							•				40
High	Price 45 (+	Gain ⊦30%)	Return 9%			Letter TH	 	Lu _{tt} illigu	ullum .					, ₁₁ ,,,,111 1	H.,,PUH	······	-				30 25
Low Inside	30 `(r Decisi	-15%) ions	Nil						1		<u> </u>	1իսու	ur I'll.								20 15
to Buy	FMA	MJJ	A S O		·····	******					.*•	•									10
Options to Sell	0 0 0 0 0 0			•				**********	••••	_	******							% TOT		 N 12/12	_7.5
Institu	tional E	202013	ns 302013							*********		••••	********	•••••	••••••	••••••••		<i>7</i> 0 101	THIS V STOCK	L ARITH.*	
to Buy to Sell	52 21	39 39	42 31	shares	t 12 - 8 - 4 -													1 yr. 3 yr.	23.1 40.7	38.4 52.8	E
Hid's(000)	4336 1998	4492 1999	4509 2000	2001	2002	2003	2004	2005	2006	<u>101111111</u> 2007	<u>1001</u> 2008	2009	2010	111111111 2011	2012	2013	2014	5 yr. © VALI	80.3 Je line Pi	211.8 JB. LLC	16-18
5.67	5.58	5.87	5.70	5.93	5.77	5.91	6.04	5.81	5.68	7.05	7.24	6.93	7.65	7.93	7.63	8.65	8.90	Revenue	s per sh		11.25
1.51	1.59	1.65	1.73	1.78	1.78	1.89	1.91	1.62	1.52 81	1.90 1.05	1.95	1.93	2.04	2.11	2.10	2.55 1.65	2.65 1.75	"Cash F	low" per s	sh N	2.75 1.85
.77	.78	.79	.79	.80	.81	.83	.84	.85	.86	.87	.88	.90	.92	.94	.96	.98	1.01	Div'd De	cl'd per s	h ^B ∎	1.12
1.99	1.12 8.52	1.42 8.61	1.43	1.86 9.25	1.98	1.49 10.46	1.58	1.96 11.52	1.96 11.60	2.24 11.95	2.44 12.23	3.28	3.06	2.61	2.34	2.75 17.55	2.85 17.80	Cap'l Sp Book Va	ending pe lue per st	ersh ∖D	2.90 20.40
6.79	6.80	7.26	7.28	7.65	7.94	7.97	8.04	8.17	8.27	8.38	8.46	8.57	8.68	8.76	10.97	11.10	11.25	Commo	n Shs Out	sťg ^C	12.00
12.9	15.5	18.2	18.2	21.5	24.3	23.5 1.34	1.21	28.6	29.0 1.57	23.0 1.22	22.2 1.34	18.4	1.32	23.0	19.4 1.24	18.5 1.03		Avg Ann Relative	P/E Ratio	10	20.0 1.35
6.0%	4.9%	4.2%	4.0%	3.3%	3.0%	3.0%	3.1%	3.4%	3.6%	3.6%	3.6%	4.1%	3.9%	3.6%	3.2%	3.2%		Avg Ann	'l Div'd Yi	ield	3.4%
CAPITA Total D	L STRU ebt \$180.	CTURE a .9 mill.	as of 9/30 Due in 5 ')/13 Yrs \$14.8	mill.	47.1 9.2	48.5	47.5	46.9 6.7	59.0 8.8	61.3 9.4	59.4 10.2	66.4 9.8	69.4 9.9	83.8 13.6	95.0 18.0	100 19.5	Revenue	es (\$mill) it (\$mill)		135 22 0
LT Deb (Total in	t \$175.5 i	mill. L	T Interes	st \$7.6 mi	ill.	17.9%	22.9%		23.5%	32.4%	27.2%	19.5%	35.2%	41.3%	32.0%	32.0%	33.0%	Income	Fax Rate		35.0%
Loosos	Unconi	alizad:		(49% o	f Cap'l)	43.5%	42.8%	44.9%	 44 4%	47.8%	1.7%		49.5%	1.8%	1.7%	2.0%	2.0%	AFUDC	% to Net F	Profit	3.0%
Pensio	n Assets	\$45.4 m	ill.	niais φ.2 1		55.9%	56.7%	54.6%	55.1%	51.8%	52.7%	49.1%	50.2%	46.5%	50.8%	50.5%	50.5%	Common	Equity F	latio	51.5%
			50 Joiig. 50	6.5 MIII.		148.9 238.9	155.1 246.1	172.3 247.7	174.1 268.1	193.2 284.3	196.5 302.3	221.3 325.2	225.6	254.2	364.6 447.9	370 465	395 490	Total Ca Net Plan	pital (\$mi t (\$mill)	II)	475 550
Pfd Sto	ck \$0.8 r	nill. I	Pfd Divd	NMF		7.5%	7.0%	5.0%	4.9%	5.5%	5.9%	5.5%	5.4%	4.9%	4.8%	6.0%	6.0%	Return o	n Total C	ap'l	5.5%
Commo as of 10	on Stock 0/31/13	11,018,1	161 shs.			10.9% 11.0%	10.6%	7.5% 7.6%	6.9% 7.0%	8.7% 8.7%	9.0% 9.1%	9.3% 9.4%	8.6%	8.3%	7.3%	9.5% 9.5%	9.5% 9.5%	Return o Return o	n Shr. Eq n Com Ec	uity quity	9.0% 9.0%
MARKE	T CAP:	\$375 mil	lion (Sm	all Cap)	0/20/42	3.2%	3.1%	.3%	NMF	1.6%	1.9%	2.3%	1.6%	1.4%	2.7%	4.0%	3.5%	Retained	to Com I	Ēq	3.0%
(\$MI	LL.)	TION	10	2012 13.2	9/30/13	71% BUSIN	71%	95%	105% t Water 9	82%	79%	/6%	81%	Maine	62%	59% The Ma	58%		12: Bidd	oford an	61%
Accour	nts Recei	vable	14.9 3.0	11.5	14.3 31.3	holding	compar	ny, whose	e income	is deriv	red from	earning	s of its	Water,	12/12.	Inc.: C	F. Has	about 2	12, Black	loyees.	Chair-
Curren	t Assets	_	18.9	36.4	47.2	largest	subsidia	ry, Conne	ecticut Wa	ater, acc	ounted fo	or about	85% of	2.2% of	the con	nmon sto	ock; Black	kRock, Ir	ic. 6.7%;	The Va	nguard
Debt D	ue		23.2	3.0	5.4 6.5	the ho service	Iding cor s to 400,	npany's 000 peop	net incom ble in 55 t	ne in 20 owns thr	12, and oughout	provides Connecti	s water cut and	Group, CT 064	5.3% (4/ 13. Telep	13 proxy hone: (8). Addres 60) 669-8	ss: 93 Wo 3636. Inte	est Main rnet: www	Street, 0 w.ctwate	Clinton, r.com.
Curren	t Liab.	_	30.4	15.9	19.3	Con	necti	cut \	Water	Ser	vice	is o	con-	utilit	ies it	overs	ees. F	or exa	mple,	last	year
ANNUA	L RATES	S Past	Pa	st Est'd	400% 1 '10-'12	soli 2012	dating	g its	opera	tions	in N red T	/laine he M	e. In aine	the o	compa fits fr	ny w om ai	as pe n IRS	rmitte	ed to	keep	the
of chang Revenu	le (per sh) Les	10 Yrs 3.5	5 Y i % 6.	rs. to 0%	' 16-'18 6.5%	Wate	er Co.	and	Biddef	ord a	nd Sa	co Wa	ater.	for lo	werin	g rate	es and	agre	eing n	ot to	seek
"Cash Earning	Flow" Js	2.5	% 6. % 6.	0% 5%	4.5% 6.5%	head	ging t l, spec	ne tw cificall	o entit y reso	urces	spen	t on r	over- egu-	We a	renei i re ra	ising	our	earni	ngs e	stim	ates
Book V	alue	1.5	% 2. % 6.	0% 5%	3.0% 6.0%	lator	y ma blisho	tters. dan	Moreo	ver, r	now ti	hat it	has	for t	the u	tility.	Desp	pite fo o flat	we t	quar hink	ter's that
Cal-	QUAR	TERLY RE	EVENUES (\$ mill.)	Full	tuck	in ac	quisiti	ions th	ere s	eem li	kely.	iture	Conn	ecticu	it Wa	ter's s	share	net ro	ose 8	% to
2010	13.8	15.9	21.0	15.7	66.4	The hom	utili 1e fi	ty is urf.	also Agree	expa ments	andin s ha	ig on	i its been	\$1.65 ing.	o in 20 For	J13, v 2014	ersus com	2012' bining	s stro g the	ng sh util	ow- itv's
2011	16.0 18.5	17.4 21.3	20.6 24.5	15.4 19.5	69.4 83.8	reac	hed t	o exp	and	pipeli	nes	to su	pply	grow	ing ra	te ba	se wit	h the	adva	ntage	s al-
2013	21.5	22.5	29.6	21.4	95.0	the 1	main (campu	wn or is of tl	ne Un	iversi	as we ty of	Con-	rise 6	1 Dy F 3% to	\$1.75	, earn	ings j	ber sn	are c	ouia
Cal-	EA	RNINGS F	PER SHAR	E A	Full	nect	icut, v	vhich	is the	equiv	alent	of a s	mall	Divi	dend for 2	grov wat	vth is er ut	s stil ility	l belo	owa the	ver-
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	too.	Auuit	101101	mei ge	15 010	- hron	ane		deca	de, th	e com	ipany	has i	not ha	id a	good
2010	.12	.27	.54 .39	.20 .11	1.13	Less for	s one Conn	rous ectic	regul ut Wa	ation	n aug One o	urs f the	well kev	divid	end-pa 5. This	aying s is a	recon trend	rd co that s	mpare should	ed to I cont	its inue
2012	.22 .24	.47 .39	.67 .86	.16 .16	1.53 1.65	facto	ors in	analy	zing a	utilit	y is l	now fa	air is	for	the f	oresee	able	futur	e du	e to	the
2014	.30	.47	.73	.25	1.75	the Hist	regula oricall	atory ly, Co	ciimat	e who icut's	ere it Publ	operatic R	ates. egu-	proje Wate	cted r's cai	shar oital s	p ris pendi	se in ng pro	ı Co ogram	nnect	icut
Cal- endar	QUAR Mar.31	Jun.30	VIDENDS	Dec.31	Full Year	lator	y Aut	hority	(PUR	A) ha	isn't h	ad a	good	Thes	e sha	re ai	e ran	iked	to out	tperf	orm
2010	.228	.228	.233	.233	.922	cond	itions	in th	eeu, <i>V</i> le stat	e as	Below	Aver	age.	to th	e stoc	k's re	cent s	streng	th, m	uch o	f its
2012	.233	.233	.238	.238 .2425	.942	In t	he re	cent	past, iking	howev a bet	ver, F ter ba	PURA	ap-	appe riod	al ove has be	r the en di	next minis	three- hed	to five	e-yeai	· pe-
2013 2014	.2425	.2425	.2475	.2475	.98	twee	en the	inter	ests o	f the	publi	c and	the	Jam	es A. I	Flood		J	anuar	y 17,	2014

(A) Diluted earnings. Next earnings report due mid-February. Quarterly earnings do no add in vestment plan available.
 '12 due to rounding.
 (B) Dividends historically paid in mid-March, (D) Includes intangibles. In '12: \$31.7 mil © 2014 Value Line Publishing LLC. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind.
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Company's Financial Strength Stock's Price Stability Price Growth Persistence Earnings Predictability B+ 90 45 85

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																			Page	9 of 3	4
MIC)DLE	SE)	(WA	TER	NDQ-I	MSEX	RI P	ecent Rice	20.80) P/E Ratio	• 21. •	4 (Traili Medi	ing: 20.6 an: 22.0)	RELATIV P/E RATI	1.1	5 div'd Yld	3.7	′%	/ALUI LINE	Ξ	
TIMELI	VESS 3	Lowered	11/15/13	High: Low:	20.0 13.7	21.2 15.8	21.8 16.7	23.5 17.1	20.5 16.5	20.2 16.9	19.8 12.0	17.9 11.6	19.3 14.7	19.4 16.5	19.6 17.5	22.5 18.6			Target 2016	Price 2017	Range 2018
SAFET	r 2	New 10/2	1/11	LEGE	NDS 20 x Divide	ends p sh				_											64
	ICAL 3	 Lowered Market) 	1/17/14	01/ Re	elative Pric	e Strength	; 								\sim						- 48
201	6-18 PR		ONS	4-for-3 sp	olit 1702 olit 11/03											····					-40 -32
	Prico	A	nn'l Total	Shaded	areas indi	cate recess	sions	6.0													24
High	25 (+	⊷20%)	8%	ս վաս			^{µµµ} ^µ hµµ	m ^{ull} ll	սորու	۱۳۳۲	he hum	u i	ասուս	ասեր	ստուհ	mm Huu	•				20 16
LOW	20 r Decisi	(-5%) ions	3%		- Il mil							վիհու,									12
	FMA	MJJ	ASO			•••••															0
to Buy Options	0000	0 1 0 0 0	1 0 0 0 0	******	•		**************************************					•••									6
to Sell	000 tional [001 Decisio	200 1 S	-							*******	·•••,,••						% TOT		N 12/13	
to Duri	1Q2013	2Q2013	3Q2013	Percen	t 12 -					_			• •	*****	*********	**********		1 vr	STOCK	INDEX 38.4	_
to Buy to Sell	38	37	42 29	shares traded	8 - 4 -		<u> </u>	htt.:							libitan ti	ulutet.		3 yr.	28.2	52.8	E
Hid's(000)	6579 1998	6489 1999	2000	2001	2002	2003	2004	2005	2006	<u>111111111</u> 2007	2008	2009	2010	2011	2012	2013	2014	© VALI	JE LINE P	JB. LLC 1	6-18
4.72	4.39	5.35	5.39	5.87	5.98	6.12	6.25	6.44	6.16	6.50	6.79	6.75	6.60	6.50	6.98	7.20	7.70	Revenue	es per sh		9.10
1.02	1.02	1.19	.99	1.18	1.20	1.15	1.28	1.33	1.33	1.49	1.53	1.40	1.55	1.46	1.56	1.75	1.85	"Cash F	low" per	sh	2.30
.67	.71	.76	.51	.66	.73	.61	.73	.71	.82	.87	.89	.72	.96	.84	.90	1.00	1.05	Earning	s per sh 4	A L B-	1.15
1.20	2.68	2.33	1.32	1.25	1.59	1.87	2.54	.07	2.31	1.66	2.12	1.49	1.90	1.50	1.36	./5 1.50	1.65	Cap'l Sp	endina p	n ⊡∎ ersh	2.00
6.00	6.80	6.95	6.98	7.11	7.39	7.60	8.02	8.26	9.52	10.05	10.03	10.33	11.13	11.27	11.48	11.70	12.10	Book Va	lue per si	D	12.90
8.54	9.82	10.00	10.11	10.17	10.36	10.48	11.36	11.58	13.17	13.25	13.40	13.52	15.57	15.70	15.82	16.00	16.25	Commo	n Shs Out	st'g ^C	17.00
13.4	15.2	17.6	28.7	24.6	23.5	30.0	26.4	27.4	22.7	21.6	19.8	21.0	17.8	21.7	20.8	20.3		Avg Ann Polativo	P/E Rat	io	20.0
6.3%	5.4%	4.4%	4.2%	3.8%	3.7%	3.5%	3.4%	3.5%	3.7%	3.7%	4.0%	4.7%	4.2%	4.0%	4.0%	3.7%		Avg Ann	'l Div'd Y	ield	3.6%
CAPITA	L STRU	CTURE a	s of 9/30)/13		64.1	71.0	74.6	81.1	86.1	91.0	91.2	102.7	102.1	110.4	115	125	Revenue	es (\$mill)		155
Total D	ebt \$166	.4 mill. [Due in 5	Yrs \$60.0	mill.	6.6	8.4	8.5	10.0	11.8	12.2	10.0	14.3	13.4	14.4	16.0	17.0	Net Prof	it (\$mill)		20.0
(LT inte	rest cove	rage: 4.1	x)	51 \$7.0 m		32.8%	31.1%	27.6%	33.4%	32.6%	33.2%	34.1%	32.1%	32.7%	33.9%	34.0%	34.0%	Income	Tax Rate		34.0%
		-		(41% 0	f Cap'l)	53.8%	53.8%	55.3%	49.5%	49.0%	45.6%	46.6%	0.8% 43.1%	42.3%	3.4% 41.5%	4.5%	4.5%	AFUDC	% to Net P rm Deht F	atio	5.0% 43.0%
Pensio	n Assets	-12/12 \$:	37.9 mill.			44.0%	42.5%	41.3%	47.5%	49.6%	51.8%	52.1%	55.8%	56.6%	57.4%	57.5%	57.0%	Common	n Equity F	latio	57.0%
Pfd Sto	ck \$2.0 r	(nill Pfd I	Divid: \$6	2.8 mill. mill		181.1	214.5	231.7	264.0	268.8	259.4	267.9	310.5	312.5	316.5	325	345	Total Ca	pital (\$mi	ll)	400
11000	σκ φ2.5 1		στν α. φ. ι			230.9	262.9	288.0	317.1	333.9 5.6%	366.3	376.5	405.9	422.2	435.2	445 6.0%	450	Net Plan	t (\$mill) n Total C	an'l	510 5.5%
Commo	on Stock 0/31/13	15,919,9	74 shs.			7.9%	8.5%	8.2%	7.5%	8.6%	8.6%	7.0%	8.1%	7.5%	7.8%	8.5%	8.5%	Return o	n Shr. Eq	uity	9.0%
						8.0%	9.0%	8.6%	7.8%	8.7%	8.9%	7.0%	8.2%	7.5%	7.8%	8.5%	8.5%	Return o	n Com E	quity	9.0%
CURRE	I CAP:	\$325 mil	2011	all Cap) 2012	9/30/13	NMF	.9%	.6% 0/%	1.3%	1.8% 70%	2.0%	.1%	2.1%	1.0%	1.4%	2.0%	2.5% 73%	Retained	I to Com I s to Net F	Eq	3.0% 70%
(\$MI	LL.)		3.1	3.0	3.0	BUSIN	ESS: Mir	dlesev \	Nater Con				nershin	2012 #	o Middle		am 2000		r 65% of	total rev	
Other		_	19.8	21.6	24.3	and op	eration of	f regulate	ed water u	tility syst	tems in N	lew Jers	ey, Del-	At 12/3	1/12, the	compan	y had 2	79 emplo	yees. In	corporate	ed: NJ.
Accts F	t Assets Pavable		22.9	24.6 3.8	27.3	aware,	and Per	nnsylvani	a. It also	operate	s water	and was	tewater	Preside	nt, CEO,	and Cha	airman: [Dennis W	. Doll. C	fficers/di	rectors
Debt D	ue		4.6	11.1	35.8	NJ and	DE. Its I	Middlese	k System p	provides	water se	rvices to	60,000	Group,	5.7% (4/	13 proxy)	. Addres	is: 1500	Ronson F	Road, Ise	elin, NJ
Curren	t Liab.		46.7	56.0	52.3	retail o	ustomers	s, primar	ily in Mid	dlesex	County,	New Jer	sey. in	08830.	Tel.: 732-	-634-1500). Interne	et: www.n	niddlesex	water.co	m.
Fix. Ch	g. Cov.	3	80%	410%	415%	Mid	dlese	x Wa	ater's	rec	ent	divid	end	New	Jers	ey la	psed.	Toge	ther	both	ac-
of chang	e (per sh)	10 Yrs.	5 Yi	rs. to	16-12	The	comp:	any ir	icrease	d its	payo	it by	only	Mea	nwhil	le, re	guest	ts for	high	event	ates.
Cash	ues Flow''	1.5 3.0	%1. %2.	0% 0%	5.5% 7.0%	1.3%	, vers	us th	e indu	stry	avera	ge of	over	have	rece	ently	been	filed	I. Tw	o of l	Mid-
Earning Divider	gs ids	3.5 1.5	%2. %1.	5% 5%	4.0% 1.5%	5%. grow	Moree	over, te of t	tnis re he nin	eprese e wat	ents t ter uti	ne io lities	west that	in D	xs su elawa	re an	d Ne	petitio w .Jer	nea r sev s	eguia eekin	tors g to
Book V	alue	4.5	% 4.	0%	2.0%	Valu	e Lin	e cov	ers. It	was	also	the	11th	recov	er cos	sts us	ed to	repa	ir and	l upg	rade
Cal-	QUAR	TERLY RE	VENUES (Sen 30	\$ mill.) Dec 31	Full	strai	ight ye	ear in	which	the	annua	l incr	rease	its v	vater	syste	ms.	If ap	provee	1, ra	ates
2010	21.6	26.5	29.6	25.0	102.7	Lon	g-teri	n div	a share ridend	e. grov	wth n	rosp	ects	tivel	7. Verv	/ favoi	rable	ruling	s wou	ld pro	ba-
2011	24.0	26.1	28.7	23.3	102.1	are	also	belov	v avei	rage.	Over	the	next	bly n	iake o	ur ea	rning	s estir	nates	conse	rva-
2012	23.5	27.4 29.1	32.3 31.3	27.1 27.6	110.4 115	thre	e- to	five-y	ear pe	eriod,	we e	expect	the	tive t	hroug	sh 201	6-201	8. ling	nrog	om	hac
2014	30.0	30.0	35.0	30.0	125	rang	iy Tal	ch of	this is	a re	sult o	f the	com-	been	incr	eased	i. Th	e com	pany	plans	s on
Cal-	EA Mar 24	RNINGS F	ER SHAR	EA Dec 21	Full	pany	/s hig	h div	idend	payo	ut rat	io, w	hich	spen	ding §	575 m	illion	over	ther	ext t	hree
2010	11	31	37	.17	96	prov This	iaes l	lso +	room i he rea	or fu son	uture why	increa Middl	ases. lesex	years	5 TO I THIRE	upgrae Most	ue an	ia exj ne fiir	pand ids w	its ir ill be	irra-
2011	.17	.23	.32	.12	.84	spor	tsad	urren	t divid	dend	yield	that	is a	veste	d in	the re	esiden	tial s	ector,	whic	h is
2012	.11 20	.23	.38 36	.17 16	.90	full	percer	ntage	point l	nighe	r thar	the	typi-	more	pred	ictable	e and	carri	es hig	gher 1	nar-
2013	.17	.20	.30	.20	1.05	cal v	vater	utility nium	y. (Invo and ac	estors	s are a low	willin er vie	ld in	gins	than ents c	the c	omme husin	ercial	and	indus	trial
Cal-	QUAR	Terly DI\	IDENDS P	AID ^B ∎	Full	retu	rn for	the p	otentia	al of l	arger	divid	ends	We	would	d adv	vise	inves	tors	to st	teer
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	in th	ie futu	ire.)	L	L */			h	clear	r of t	his st	ock	for th	ne tin	1e be	ing.
2010	.180	.180 .183	.180 .183	.183 .185	.72	luck	uiese: (in tl	x nas he co	deen mmer	nit v cial s	and in	some ndusi	bad trial	how	gain	compa	anys ent t	earni ractio	ngs c	an so suppo	me- rt a
2012	.185	.185	.185	.1875	.74	mar	kets.	Last	year, a	larg	e Hes	s refi	nery	loftie	r div	idend,	the	re are	e moi	e wo	orth-
2013	.18/5	.18/5	.18/5	.19	./53	was	shutt	ered.	In ad	ditior	i, a n	najor	con-	while	e selec	tions	in the	wate	r utili	ty gro	2011
1	1				1	uad	0 .50	'ppry	water	ual	arget	νυιυμβ	511 111	Jaille	. л. 1	1000		J	unual	y 11,	~U14

(A) Diluted earnings. May not sum due to plan available.
 (B) Dividends historically paid in mid-Feb.,
 (C) In millions, adjusted for splits.
 (D) Intangible assets in 2012: \$9.2 million,
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																			Page 1	0 of 3	4
SJV	V CC)RP.	NYSE	SJW			R P	ecent Rice	29.1	5 P/E RATI	o 23. '	1 (Traili Medi	ng: 24.5) an: 23.0)	RELATIV P/E RATI	1.2	4 ^{DIV'D} YLD	2.6	%	ALU LINE	Ξ	
TIMELIN	vess 3	Lowered	11/8/13	High: Low:	15.1 12.7	15.0 12.6	19.6 14.6	27.8 16.1	45.3 21.2	43.0 27.7	35.1 20.0	30.4 18.2	28.2 21.6	26.8 20.9	26.9 22.6	30.1 24.5			Targe	Price	Range
SAFET	(3	New 4/22	/11	LEGE	NDS 50 x Divide	ends p sh						_							2010	2017	2010
TECHN		Raised 1	/3/14	div •••• Re	vided by In elative Pric	terest Rate e Strength															
BETA .8	35 (1.00 = 6-18 PR	Market) O.IFCTIC	NS	3-for-1 sp 2-for-1 sp	olit 3/04 olit 3/06										\langle	· · · ·					50
	Price	Gain	nn'l Total	Shaded	areas indi	cate reces	sions		ا _{ال}	htt _{ull} ul											
High	40 (+	+35%) (±5%)	11%	-				երկիս	μημ ^{τη.}				<mark>լ, Ալլլոս</mark>	ոսվիս	mtt l	ուսուս	-				
Inside	r Decis	ions	470	4			ի իրով	11111				1.1									15
to Buy	F M A 0 0 0	M J J 0 0 0	A S O 0 0 0	100040	To lunit.	0,1000						•									10
Options to Sell	0 0 0 0 0 0	0 0 0 0 0 0	1 0 0 1 0 0			••••		·····		·	•••••	•••						₩ TOT		N 12/12	_7.5
Institu	tional D	Decisio	15	••••	••••	····	• ^{-•} • _• •••••	••••		1.		****	*********		******			% 101	THIS N	L ARITH.*	
to Buy	46	47	43	Percen shares	t 15 – 10 –													1 yr. 3 yr	15.1	38.4	E I
to Sell Hid's(000)	10000	10629	10697	traded	5 -	سيلاس	سيريايا	սողիրո					hantiiliilii	սկկկին	սլլլու	ողիրողո		5 yr.	14.9	211.8	
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	11.05	12 12	11.69	2010	12 05	2012	2013	2014	© VALU	JE LINE P	JB. LLC	16-18
1.27	1.26	1.43	1.23	1.43	1.55	1.75	1.89	2.21	2.38	2.30	2.44	2.21	2.38	2.80	2.97	3.25	3.50	"Cash F	ow" per	sh	3.65
.80	.76	.87	.58	.77	.78	.91	.87	1.12	1.19	1.04	1.08	.81	.84	1.11	1.18	1.20	1.40	Earnings	s per sh	A	1.60
.38	.39	.40	.41	.43	.46	.49	.51	2.83	.57	.61	.65	.66	.68	.69	.71	.73	.75	Div'd De Can'l Sn	cl'd per s ending n	h ^B ∎ ersh	.90
7.02	7.53	7.88	7.90	8.17	8.40	9.11	10.11	10.72	12.48	12.90	13.99	13.66	13.75	14.20	14.71	15.40	16.40	Book Va	lue per sl	1	19.15
19.02	19.01	18.27	18.27	18.27	18.27	18.27	18.27	18.27	18.28	18.36	18.18	18.50	18.55	18.59	18.67	20.25	21.00	Common	n Shs Ou	st'g ^C	23.00
11.2	13.1	15.5	2 15	18.5	94	15.4 88	19.6	19.7	23.5 1.27	33.4	26.2	28.7	29.1	21.2	20.4	22.7		Avg Ann Relative	P/E Ratio	10	22.0 1.45
4.3%	3.9%	3.0%	2.1%	3.0%	3.4%	3.5%	3.0%	2.4%	2.0%	1.7%	2.3%	2.8%	2.8%	2.9%	3.0%	2.7%		Avg Ann	'l Div'd Y	ield	2.6%
CAPITA	L STRU	CTURE a	is of 9/30	/13		149.7	166.9	180.1	189.2	206.6	220.3	216.1	215.6	239.0	261.5	275	310	Revenue	es (\$mill)		375
LT Deb	ebt \$335 t \$335.1 i	.1 mill. L mill. L	T Interes	rrs \$21.2 st \$18.6 n	' mill. nill.	36.2%	16.0	20.7	22.2	19.3	20.2	15.2	15.8	20.9	22.3	26.0	29.0	Net Prof	it (\$mill) Fax Rate		37.0
(Total ir	iterest co	verage: 4	1.6x)	(51% o	f Cap'l)	1.6%	2.1%	1.6%	2.1%	2.7%	2.3%	2.0%		2.0%	2.0%	3.0%	4.0%	AFUDC 9	% to Net I	Profit	5.0%
Leases	, Uncapi	talized: /	Annual re	ntals \$4.7	7 mill.	45.6%	43.7%	42.6%	41.8%	47.7%	46.0%	49.4%	53.7%	56.6%	55.0%	54.5%	54.0%	Long-Ter	rm Debt F	Ratio	51.0%
Pensio	n Assets	\$75.5 m	nill.			306.0	328.3	341.2	391.8	453.2	54.0% 470.9	499.6	46.3%	43.4% 607.9	45.0%	45.5%	40.0%	Total Ca	pital (\$mi	(atio	49.0% 900
Pfd Sto	ck None	(Oblig. \$1	41.0 mill.		428.5	456.8	484.8	541.7	645.5	684.2	718.5	785.5	756.2	831.6	890	950	Net Plan	t (\$mill)	.,	1150
0	01		00 -1 -			6.9%	6.5%	7.6%	7.0%	5.7% 8.2%	5.8%	4.4%	4.3%	4.9%	5.0% 8.1%	5.0%	5.0%	Return o	n Total C	ap'l	6.0% 8.5%
as of	10/25/13	20,162,1 3	33 SNS.			10.0%	8.7%	10.6%	9.7%	8.2%	8.0%	6.0%	6.2%	7.9%	8.1%	8.5%	8.5%	Return o	n Com E	quity	8.5%
MARKE	T CAP:	\$600 mil	lion (Sma	all Cap)	0/20/42	4.7%	3.6%	5.6%	5.2%	3.5%	3.3%	1.2%	1.2%	3.1%	3.3%	3.5%	4.0%	Retained	to Com	Eq	3.5%
	LL.)	TION	2011	2012	9/30/13	53%	58%	4/%	46%	57%	59%	80%	80%	61%	59%	50%	54%		s to Net H	rot	50%
Other	ssets	_	42.2	40.4	<u> </u>	chase,	storage,	purificati	oration e on, distrib	oution, ar	nd retail s	ale of w	n, pur- ater. It-	services	, includin	ne con ng water	system of	perations	s, cash re	a water-	es, and
Current Accts F	t Assets Pavable		68.9 7 4	42.9 8.5	49.3 11.8	provide	es water	service t	o approxi	imately 2	27,000 c	onnectio	ns that	mainten	ance con	ntract ser	vices. S.	JW also d	wns and	l operate	s com-
Debt D Other	ue		.8 20.1	20.7 19.9	7.6	Jose a	rea and	8,700 co	nnections	that ser	ve appro	ximately	36,000	Charles	J. Toeni	iskoetter.	Inc.: CA	. Addres	s: 110 W	l. Taylor	Street,
Current	t Liab.	_	28.3	49.1	49.7	resider	its in a s	ervice ar	ea in the	region b	etween S	San Anto	nio and	San Jos	e, CA 95	5110. Tel	.: (408) 2	79-7800.	Int: www	.sjwater.	com.
FIX. Ch	g. Cov.	2 S Pact	.76% Pa	247% st Est'd	231%	We	have mate	low	ered	our Higho	2013 r. cost	earn	both	actio	nsisr 's sh	not an	exact	t scien	ice. dond	are	wth
of chang	e (per sh)	10 Yrs.	5 Yi	s. to	16-18	extra	acting	grou	nd wa	ter a	nd for	r pur	chas-	pros	pects	are	unex	citing	g. The		pany
"Cash	Flow"	5.5 6.5	% 4. % 3.	5% s	4.0% 5.0%	ing	water	on th	ne ope	n ma	rket r	esulte	ed in	is ex	pected	to r	aise i oarly	ts div	idend	later	this
Divider	js ids	4.0	% -1. % 4.	5% 0%	7.5% 4.5%	third	l-quar	ter ea	rning	s per	share	e. As	a re-	antic	ipatin	g onl	y a (quarte	erly i	ncreas	se of
BOOK V		D.D	% 3.	5 % (1)	5.0%	sult,	we t	hink t	he con	npany	y's ani	nual s	share	\$0.00)5 a sl	hare (or \$0	.02 a :	share	on ai	n an - 7%
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Full Year	prev	ious e	stima	1 \$1.2 te.	0, 30.	10 les	s thai	i our	versu	is the	indus	stry a	verage	eofor	ver 5%	6. As
2010	40.4	54.1	70.3	50.8	215.6	Ear	nings	for	the	next	seve	ral y	ears	futur	e rate	e relie	ef ís i	mplen	nente	d, the	re is
2011	43.7 51.1	59.0 65.6	73.9 82.4	62.4 62.4	239.0	will 2012	depe SIW	e nd u V filed	pon s a rat	state te cas	regu e with	lator the	s. In Cali-	the j	possib	ility ervati	that (ve	our p	rojecti	ions (could
2013	50.1	74.2	85.2	65.5	275	forn	a Pu	blic U	tility	Com	missio	n (Cl	PUC)	SJW	's op	perate	es i	n he	althy	ser	vice
2014	50.0 FA	RNINGS	ER SHAR	75.0 E A	510	seek	ing to) have % in	e rate 2014	s inci and	reased	21.5	% in 2016	area	s. The	e com n Sar	pany'	s mai	n util home	lity of	pera-
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	resp	ectful	ly. Ra	uising	cust	omers	, in <i>i</i> bill	s by	Valle	y. Wl	hile	other	parts	s of	Calif	ornia
2010	.055	.24	.44	.11	.84	such	sign	ificant	amo	unts	is no	t eas	y for	may	suffer	, due	to th	ie hig	h cos	t of o	loing
2012	.05	.29 .28	.44 .53	.35	1.18	any	antia	iated	and h	ever, adlv	SJW3 in nee	s pipe ed of	mod-	shou	iess, t ld co	ontini	ageo ie to	ograpi o ex	nc 100 periei	ación ice	solid
2013	.07	.37	.44	.32	1.20	erniz	zation	•		j -				grow	th. N	loreov	ver, t	he co	mpar	ıy's ∏	Texas
Cal-	QUAR	.40 Terly div	IDENDS P	AID ^B	Full	We ing	are S.IW	guard s cha	ledly	opti of r	misti eceiv	c reg ing s	ard-	subsi Austi	diary	is San ∆r	locate	ed in	the dor	thr	iving
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	vora	ble r	uling	. With	the	excep	tion o	f the	We t	hink	that	ther	e are	oth	er st	ocks
2010	.17 173	.17 173	.17 173	.17 173	.68 03	allov	ved i	return	on	equit	y, th	e CP	UC's	in t	he wa tor a	ater	utilit	y gro	up t	hat	hold
2012	.1775	.1775	.1775	.1775	.03	Utili	ties t	hat ha	ave m	ade s	ound	argun	nents	juste	d basi	is, th	e equ	ity's p	rospe	cts a	re in
2013	.1825	.1825	.1825	.1825	.73	for t	the ne	ed fo	r higi	her ta	riffs	have	been	line v	with t	he ind	lustry	avera	iges.	. 17	2014
					1	trea	lea ta	uriy. S	still,	preate	ung	regula	ators	Jam	-5 A. I	-100d		Já	uuar	V 17, 1	cU14

(A) Diluted earnings. Excludes nonrecurring losses : 03, \$1.97; '04, \$3.78; '05, \$1.09; '06, \$16.36; '08, \$1.22; '10, 46¢. Next earnings report due early February. Quarterly eqs. may
 (B) Dividends historically paid in early March, \$16.36; '08, \$1.22; '10, 46¢. Next earnings report due early February. Quarterly eqs. may
 (C) In millions, adjusted for stock splits. June, September, and December.

 Divid rein-vestment plan available.
 (C) In millions, adjusted for stock splits.

 (C) In millions, adjusted for stock splits. In the publishing LLC. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

u	January 17	, 2014
Company's Fin	ancial Strength	B+
Stock's Price S	tability	80
Price Growth P	ersistence	45
Earnings Predi	ctability	80
To subscrib	e call 1-800-8	33-0046

																			Page 1	1 of 3	4
YO	RK V	VATI		DQ-YOR	W		R P	ecent Rice	21.3	7 P/E RATI	o 26. '	7 (Traili Medi	ng: 29.7) an: 25.0)	RELATIVI P/E RATI	5 1.4	4 div'd Yld	2.7	7%	/ALUI LINE	2	
TIMELIN	IESS 5	Lowered	11/22/13	High: Low:	13.4 8.2	13.5 9.3	14.0 11.0	17.9 11.7	21.0 15.3	18.5 15.5	16.5 6.2	18.0 9.7	18.0 12.8	18.1 15.8	18.5 16.8	22.0 17.6			Target 2016	Price 2017	Range 2018
SAFEIN		2 New 7/1	9/13	LEGE	NDS 10 x Divide	ends p_sh															64
TECHNI	CAL Z	Raised 1	/3/14	div Re	vided by In elative Pric	terest Rate e Strength															48
BEIA ./	6-18 PR	 Market) O.IFCTI(ONS	2-for-1 sp 3-for-2 sp	olit 5/02 olit 9/06										~						-40 32
201	0-10 1 N	A	nn'l Total	Shaded	no areas indi	cate recess	sions									<u> </u>					24
High	30 (·	6ain +40%)	12%	-				L.I.I.I	ուկոս,	91996.						<mark>μ., μ</mark> μί	•-				20
Low	20 r Decis	(-5%)	2%		ц		սու լ	ոսո	1 1				իսլի ^{ր,}								10
manue	F M A	MJJ	ASO				100	· · · · ·				Ч.									0
to Buy Options	$ \begin{array}{ccc} 0 & 0 & 4 \\ 0 & 0 & 0 \end{array} $	0 1 5 0 0	025000	11 <u>11111111111111111111111111111111111</u>	••																-8
to Sell	0 0 1		0 0 0			••••••	· · · · · · · · · · · · · · · · · · ·		••••	· · · · · ·		•••••						% TOT	RETUR	N 12/13	
mstitu	1Q2013	2Q2013	3Q2013	Percen	t 12 -			•			••••	•••	·•• ••••••	•••••	·				THIS V	INDEX	L
to Buy to Sell	33 21	32 26	30 23	shares	8 -						-							1 yr. 3 yr.	21.7 31.5	38.4 52.8	L
Hid's(000)	3375	3346	3451	2001	2002		2004		2006	2007	2009	2000			2012		2014	5 yr. © VALI	101.4	211.8	16 10
1337	1990		2000	2.05	2002	2003	218	258	256	2007	2,89	2003	3.07	3 18	3.21	340	2014	Revenue	s ner sh	JD. LLU	4 15
				.59	.57	.65	.65	.79	.77	.86	.88	.95	1.07	1.09	1.12	1.25	1.35	"Cash F	low" per s	sh	1.65
				.43	.40	.47	.49	.56	.58	.57	.57	.64	.71	.71	.72	.75	.90	Earning	s per sh A		1.05
				.34	.35	.37	.39	.42	.45	.48	.49	.51	.52	.53	.54	.55	.57	Div'd De	cl'd per s	h B	.70
				3.79	3.90	4.06	4.65	4.85	5.84	5.97	6.14	6.92	7.19	7.45	.94 7.73	7.85	8.70	Book Va	lue per si	ווס ויס ו	9.60
				9.46	9.55	9.63	10.33	10.40	11.20	11.27	11.37	12.56	12.69	12.79	12.92	13.00	12.60	Commo	n Shs Out	st'g ^C	12.00
				17.8	26.9	24.5	25.7	26.3	31.2	30.3	24.6	21.9	20.7	23.9	24.4	26.3		Avg Ann	'I P/E Rat	io	23.0
				.91	1.4/	3.2%	1.30	2.9%	1.68 2.5%	1.61 2.8%	1.48	1.40	1.32	1.50	1.55	1.47 2.8%		Avg Ann	'l Div'd Y	ield	1.55 2.8%
CAPITA	I STRU		as of 9/3	0/13	0.070	20.9	22.5	26.8	2.070	31.4	32.8	37.0	39.0	40.6	41.4	43.0	46.0	Revenue	s (\$mill)		50.0
Total D	ebt \$84.	9 mill.	Due in 5	Yrs \$19.5	mill.	4.4	4.8	5.8	6.1	6.4	6.4	7.5	8.9	9.1	9.3	10.0	11.5	Net Prof	it (\$mill)		12.5
(Total in	terest co	nill. I overage: 3	LT Intere 2.9x)	st \$5.2 mi	II.	34.8%	36.7%	36.7%	34.4%	36.5%	36.1%	37.9%	38.5%	35.3%	37.6%	36.0%	36.0%	Income 1	Tax Rate		36.0%
Densis		40/40 @	00.7	(45% o	f Cap'l)	12 /0/	42.5%		7.2%	3.6%	10.1%		1.2%	1.1%	1.1%	1.0%	1.0%	AFUDC	% to Net F	Profit	1.0%
Pensio	1 Assets	5 12/12 \$	22.7 mill. Oblig. \$3	4.7 mill.		43.4 <i>%</i> 56.6%	57.5%	55.9%	40.3 % 51.7%	40.3 % 53.5%	45.5%	54.3%	51.7%	52.9%	40.0% 54.0%	40.0 <i>%</i> 55.0%	54.5%	Commor	n Equity F	latio	42.5% 57.5%
Dfd Sto	ck None		-			69.0	83.6	90.3	126.5	125.7	153.4	160.1	176.4	180.2	184.8	190	185	Total Ca	pital (\$mi	II)	200
110 010	CRINOIC					116.5	140.0	155.3	174.4 6.2%	191.6 6.7%	211.4	222.0	228.4	233.0	240.3	245	250	Net Plan	t (\$mill) n Total C	an'l	260 7.5%
Commo	n Stock	12,942,8	843 shs.			11.4%	10.0%	11.6%	9.3%	9.5%	9.2%	8.6%	9.8%	9.5%	9.3%	9.5%	11.5%	Return o	n Shr. Eq	uitv	11.0%
		·				11.4%	10.0%	11.6%	9.3%	9.5%	9.2%	8.6%	9.8%	9.5%	9.3%	9.5%	11.5%	Return o	n Com E	quity	11.0%
	I CAP:	\$275 mil	2011	all Cap)	0/20/42	2.6%	2.1%	3.0%	2.2%	1.7%	1.4%	1.9%	2.7%	2.5%	2.4%	3.0%	3.0%	Retained	I to Com	Eq	3.5%
	LL.)		2011	2012	60		79%	74%	11%	02%	00%	/0%	12%	13%	74%	/1%	03%				07%
Accoun	ts Rece	ivable	6.0	6.4	3.9	regulat	ed water	utility in	the Unite	ed States	s. It has	operated	contin-	sewer b	illing serv	ices. Inc	orporate	d: PA. Yo	ork had 1	03 full-tir	ne em-
Current	Assets	-	11.4	11.6	14.3	uously	since 18	16. As of	Decemb	er 31, 20)12, the (company	's aver-	ployees	at 12/	31/12.	President	t/CEO:	Jeffrey I	R. Hines	s. Of-
Accts P	ayable		1.1	1.1	1.9	tory ha	d an esti	mated po	pulation of	of 189,00	0. Has m	lore than	63,000	dress: "	130 East	Market	Street	York, Per	nsylvani	a 17401	. Tele-
Other		_	4.1	4.3	5.0	custom	ers. Res	idential c	ustomers	accounte	ed for 63	% of 201	2 reve-	phone:	(717) 845	i-3601. Ir	nternet: w	ww.york	water.con	۱.	
Fix. Ch	g. Cov.	1	5.3 160%	5.5 156%	6.9 154%	The	Yorl	k Wa	ter C	omp	any j	proba	ably	And,	even	assu	ming	a re	ductio	n in	the
ANNUA		S Past	Pa	st Est'd	i '10-'12	just	ende	d. We	think	k that	t the	compa	ny's	repui	chase	se re	thin	k that	t the	equit	v-to-
Revenu	e (per sn) Ies	10 Yrs 4.5	. 51 5% 3	rs. to .5%	1 6- 18 4.5%	shar	e net	bare	ly mo	ved h	igher	in ²	2013,	total	capita	al rati	io will	l rema	in at	a hea	lthy
"Cash I Earning	Flow" IS	6.5 5.5	5% 6 5% 4	.5% .5%	7.0% 6.5%	reac	ning fourth	30.73, 1-cons	at d ecutive	est. e vea	rin v	repres which	the	55% bv 2	next y 016-20	year, 1)18. F	ana g Tavin	radua g soli	d fina	se to	o7% will
Dividen Book V	ids alue	1.5 7.0	5%3 0%6	.0% .0%	5.0% 4.5%	botto	om li	ne ha	is sho	owed	little	impi	ove-	also	provic	le Yor	'k wit	h gre	ater f	lexibi	lity.
Cal-	QUAF	TERLY RE	EVENUES	(\$ mill.)	Full	men	t. Mo	preove	r, the	e divi	idend mo tir	only	in- riod	As the norm	ne inc	lustry	cont	inues	to co	nsolic	late, ould
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	Hig	her r	ates of	could	possi	ibly p	provi	de a	be m	ade to	help	foster	earn	ings g	rowth	l.
2010	9.0 9.6	9.7 10.5	10.5 10.5	9.8 10.0	39.0 40.6	nice	lift	to pi	rofits	in 2	014,	howe	ver.	We l	have.	raise	d th	e cor	npan	y's lo	ng-
2012	9.6	10.4	11.0	10.4	41.4	YOFK	is st filed	lli aw	aiting vear i	the r n Per	uling	on a	rate The	term raise	divi dits	dena divide	grov end b	vtn p	rospe % last	cts. 1 t quat	(OrK rter
2013	10.1	10.7 11 5	10.9 12 2	11.3 11 8	43.0	petit	ion w	as for	a 17%	6 hike	in ta	riffs t	o en-	nearl	y dou	ıble	the a	iverag	e of	the	past
Cal-	E/	RNINGS	PER SHAR	E A	Full	able	it to	recov	ver the	e nea	rly \$	50 mi	llion	sever	al yea	ars. T	hough	this	rate i	s stil	l be-
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	upgr	ading	the	syster	n's de	eterio	rating	in-	more	positi	ive lor	aver ng-ter	m trei	nd.	it sign	ai d
2010	.15 17	.18 19	.21 19	.17 16	.71 71	frast	ructu	re.				0		York	sha	ares	are	nov	v ra	nked	5
2012	.15	.17	.22	.18	.72	A S	nare- heli	repui n. Th	rchase	e pro	ogran / has	n wo n't ra	eally	(LOW form	est) ance	t or y Whil	ear-a	nead	relat ok for	u ve j the d	p er-
2013	.17 . 19	.18 .22	.19 .22	.21 .22	.75	boug	ht ba	ck an	y of th	he 1.2	2 milli	ion sh	ares	pany	has	impi	roved	since	our	Oct	ober
Cal-	QUA	RTERLY DI	VIDENDS	PAID ^B	Full	auth	orized	i by i	ts boa might	rd me	ore th	an a	year	repor	t, it r	now aj	ppear	s that	all of	the o	com-
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	the	amou	nt rep	presen	ts m	ore th	an 9	% of	in th	e rece	ent st	ock p	rice. I	ndeed	, the	cur-
2010	.128	.128 .131	.128 .131	.128 .131	.512	the o	compa	ny's o	utstan	ding	share	5.		rent	price	earni	ings	ratio	of nea	arly 2	7 is
2012	.134	.134	.134	.134	.535	good	uaia d sł	nce s ape.	Meet Yorl	snou k's f	inanc	es ł	i in iave	eral 1	narke	t.	wate	i utili	ty and	i uie	gen-
2013	.138	.138	.138	.130	.552	strei	ngthei	ned ov	ver th	e last	seve	ral y	ears.	Jame	es A. I	Flood		J_{i}	anuar	y 17,	2014

Company's Financial Strength Stock's Price Stability Price Growth Persistence Earnings Predictability B+ 90 70 100 To subscribe call 1-800-833-0046.

 (A) Diluted earnings. Next earnings report due early February.
 (B) Dividends historically paid in mid-January, April, July, and October.
 (C) In millions, adjusted for splits.

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United Water Rhode Island, Inc. Summary of Risk Premium Models for the Proxy Group of Nine Water Companies

		Proxy Group of Nine Water Companies
Predictive Risk Premium Model ™ (PRPM™) (1)		11.89 %
Risk Premium Using an Adjusted Market		
Approach (2)		9.67 %
	Average	<u> 11.33 </u> %

Notes:

(1) From page 13 of this Schedule.

(2) From page 14 of this Schedule.

GARCH Coefficient (1)	American States Water Co. 1.541826259	American Water Works Co., Inc. 4.572332998	Aqua America, Inc. 2.198333083	Artesian Resources Corp. 2.159831171	California Water Service Group 1.83967266	Connecticut Water Service, Inc. 1.808647271	Middlesex Water Company 1.950055786	SJW Corporation 1.364467426	York Water Company 1.995065254
Average Variance (1)	0.39%	0.25%	0.48%	0.30%	0.31%	0.28%	0.27%	0.42%	0.46%
PRPM TM Derived Risk Premium (1)	7.45%	14.41%	13.30%	8.11%	7.12%	6.35%	6.49%	2.09%	11.57%
Risk-Free Rate (2)	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%
Indicated Cost of Common Equity	11.89%	18.85%	17.74%	12.55%	11.56%	10.79%	10.93%	11.53%	16.01%
								Average	13.54%
								Median	11.89%

Notes: (1) Based upon data from CRSP(R) Data © 2012, Center For Research in Security Prices (CRSP(R)), The University of Chicago Booth School of Business. (2) From note 3 on page 23 of this Schedule.

Exhibit No.___ Schedule PMA-8 Rebuttal Page 13 of 34

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Through Use of a Risk Premium Model Using an Adjusted Total Market Approach

Line No.			Proxy Group of Nine Water Companies
1.		Prospective Yield on Aaa Rated Corporate Bonds (1)	5.19 %
2.		Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A Rated Public Utility Bonds	0.16 (2)
3.		Adjusted Prospective Yield on A Rated Public Utility Bonds	5.35 %
4.		Adjustment to Reflect Bond Rating Difference of Proxy Group	-0.04 (3)
5.		Adjusted Prospective Bond Yield	5.32 %
6.		Equity Risk Premium (5)	4.35
7.		Risk Premium Derived Common Equity Cost Rate	<u>9.67</u> %
Notes:	(1)	Six quarter average consensus forecast ending averaged with the 2015-2019 and 2020-2024 co Moody's Aaa Rated Corporate bonds from Blue	with Q1 of 2015 onsensus forecast of Chip Financial

(2) The average yield spread of A rated public utility bonds over Aaa rated corporate bonds of 0.16% from page 16 of this Schedule.

- (3) Adjustment to reflect the A1/A2 Moody's bond rating of the proxy group of nine water companies as shown on page 16 of this Schedule. The 4 basis point adjustment is derived by taking 1/6 of the spread between Aa2 and A2 Public Utility Bonds (1/6 * 0.21% = 0.04%).
- (4) From page 17 of this Schedule.

United Water Rhode Island, Inc. Comparison of Bond Ratings, Business Risk and Financial Risk Profiles for the Proxy Group of Nine Water Companies

	M	oody's	Standa	rd & Poor's
	Bon	d Rating	Bon	d Rating
	Febru	uary 2014	Febru	ary 2014
Proxy Group of Nine Water Companies	Bond Rating	Numerical Weighting (1)	Bond Rating	Numerical Weighting (1)
American States Water Co. (2)	A2	6.0	A+	5.0
American Water Works Co., Inc. (3)	A1	5.0	А	6.0
Aqua America, Inc. (4)	NR		AA-	4.0
Artesian Resources Corp.	NR		NR	
California Water Service Group (5)	NR		AA-	4.0
Connecticut Water Service, Inc. (6)	NR		A/A-	6.5
Middlesex Water Company	NR		А	6.0
SJW Corporation (7)	NR		А	6.0
York Water Company	NR		A-	7.0
Average	A1/A2	5.5	A+/A	5.5

Notes:

(1) From Schedule PMA-7, page 5 of Ms. Ahern's Direct Exhibit.

(2) Ratings are those of Golden State Water Company.

(3) Ratings are those of Pennsylvania American Water.

(4) Ratings are those of Aqua Pennsylvania, Inc.

(5) Ratings are those of California Water Service Co.

(6) Ratings are those of Connecticut Water Company.

(7) Ratings are those of San Jose Water Co.

Source Information:

Moody's Investors Service

Standard & Poor's Global Utilities Rating Service

<u>MoodVS</u> Comparison of Interest Rate Trends for the Three Months Ending January 2014 (1)

olic Utility Bonds			Baa over A				0.45 %
Spread - Pub			A over Aa				0.21 %
tility Bonds	Baa (Pub.	Util.) over	Aaa (Corp.)				0.61 %
prporate v. Public U	A (Pub. Util.)	over Aaa	(Corp.)				0.16 %
Spread - Cc	Aa (Pub. Util.)	over Aaa	(Corp.)				(0.05) %
			Baa Rated	5.09 %	5.25	5.24	5.19 %
		Public Utility Bonds	A Rated	4.63 %	4.81	4.77	4.74 %
			Aa Rated	4.44 %	4.59	4.56	4.53 %
	Corporate	Bonds	Aaa Rated	4.49 %	4.62	4.63	4.58 %
			Months	January-14	December-13	November-13	Average of Last 3 Months

Notes: (1) All yields are distributed yields.

Source of Information: Mergent Bond Record, February 2014, Vol. 81, No. 2.

United Water Rhode Island, Inc. Judgment of Equity Risk Premium for the Proxy Group of Nine Water Companies

Line No.		Proxy Group of Nine Water Companies
1.	Calculated equity risk premium based on the total market using	
	the beta approach (1)	4.00 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities	
	with A rated bonds (2)	4.70
3.	Average equity risk premium	4.35 %
Notes:	(1) From page 18 of this Schedule.	

(2) From page 21 of this Schedule.

United Water Rhode Island, Inc. Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for the Proxy Group of Nine Water Companies

Line No.		Proxy Group of Nine Water Companies	
	Based on SBBI Valuation Yearbook Data:		
1.	Ibbotson Equity Risk Premium (1)	5.60 %	, D
2.	Ibbotson Equity Risk Premium based on $PRPM^{TM}$ (2)	9.33	
	Based on Value Line Summary and Index:		
3.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (3)	3.55	
4.	Conclusion of Equity Risk Premium (4)	6.16 %	, D
5.	Adjusted Value Line Beta (5)	0.65	
6	Beta Adjusted Equity Risk Premium	4.00 %	'n

- Notes: (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2012 Valuation Yearbook Market Results for Stocks, Bonds, Bills, and Inflation minus the arithmetic mean monthly yield of Moody's Aaa and Aa corporate bonds from 1926 2012. (11.83% 6.23% = 5.60%).
 - (2) The Predictive Risk Premium Model (PRPMTM) is discussed in Ms. Ahern's accompanying direct testimony. The Ibbotson equity risk premium based on the PRPMTM is derived by applying the PRPMTM to the monthly risk premiums between Ibbotson large company common stock monthly returns minus the average Aaa and Aa corporate monthly bond yields, from January 1928 through December 2013.
 - (3) The equity risk premium based on the Value Line Summary and Index is derived from taking the projected 3-5 year total annual market return of 8.74% (described fully in note 1 of page 23 of this Schedule) and subtracting the average consensus forecast of Aaa corporate bonds of 5.19% (Shown on page 14 of this Schedule). (8.74% 5.19% = 3.55%).
 - (4) Average of Lines 1, 2, & 3.
 - (5) Median beta derived from page 22 of this Schedule.
 - Sources of Information:

Ibbotson® SBBI® 2013 Valuation Yearbook - Market Results for Stocks, Bonds, Bills, and Inflation, Morningstar, Inc., 2013 Chicago, IL. Industrial Manual and Mergent Bond Record Monthly Update. Value Line Summary and Index Blue Chip Financial Forecasts, February 1, 2014

Consensus Forecasts Of U.S. Interest Rates And Key Assumptions¹

				Histor	ry				Cons	ensus 1	Foreca	sts-Qu	arterly	Avg.
	Av	erage For	Week End	ding	Ave	rage For M	Month	Latest Q	1Q	2Q	3Q	4Q	1Q	2Q
Interest Rates	Jan. 24	Jan. 17	Jan. 10	Jan. 3	Dec.	Nov.	Oct.	<u>4Q 2013</u>	<u>2014</u>	<u>2014</u>	<u>2014</u>	<u>2014</u>	<u>2015</u>	<u>2015</u>
Federal Funds Rate	0.07	0.07	0.08	0.08	0.09	0.08	0.09	0.09	0.1	0.1	0.2	0.2	0.2	0.3
Prime Rate	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.3	3.3	3.3	3.3	3.3	3.4
LIBOR, 3-mo.	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.3	0.3	0.3	0.4	0.4	0.5
Commercial Paper, 1-mo.	0.05	0.05	0.05	0.05	0.06	0.05	0.07	0.06	0.1	0.1	0.1	0.2	0.2	0.4
Treasury bill, 3-mo.	0.04	0.04	0.05	0.07	0.07	0.07	0.05	0.06	0.1	0.1	0.1	0.1	0.2	0.3
Treasury bill, 6-mo.	0.07	0.06	0.07	0.10	0.10	0.10	0.08	0.09	0.1	0.1	0.2	0.2	0.3	0.4
Treasury bill, 1 yr.	0.11	0.11	0.13	0.13	0.13	0.12	0.12	0.12	0.2	0.2	0.3	0.4	0.5	0.7
Treasury note, 2 yr.	0.41	040	0.41	0.39	0.34	0.30	0.34	0.33	0.4	0.5	0.6	0.8	1.0	1.2
Treasury note, 5 yr.	1.67	1.65	1.71	1.73	1.58	1.37	1.37	1.44	1.7	1.8	1.9	2.1	2.2	2.4
Treasury note, 10 yr.	2.86	2.86	2.96	3.01	2.90	2.72	2.62	2.75	3.0	3.1	3.2	3.3	3.4	3.5
Treasury note, 30 yr.	3.75	3.78	3.87	3.93	3.89	3.80	3.68	3.79	3.9	4.0	4.1	4.3	4.3	4.4
Corporate Aaa bond	4.47	4.48	4.53	4.55	4.62	4.63	4.53	4.59	4.6	4.8	4.9	5.0	5.1	5.2
Corporate Baa bond	5.17	5.19	5.28	5.35	5.38	5.38	5.31	5.36	5.4	5.6	5.7	5.8	5.9	6.0
State & Local bonds	4.50	4.55	4.68	4.75	4.73	4.60	4.56	4.63	4.6	4.7	4.8	4.8	4.9	5.0
Home mortgage rate	4.39	4.41	4.51	4.53	4.46	4.26	4.19	4.30	4.6	4.7	4.8	5.0	5.1	5.2
				Histo	ry				Co	onsensi	is Fore	casts-(Juarte	rly
	1Q	2Q	3Q	4Q	1Q	2Q	3Q	$4Q^*$	1Q	2Q	3Q	4Q	1Q	2Q
Key Assumptions	2012	2012	2012	2012	2013	2013	2013	<u>2013</u>	2014	2014	2014	2014	2015	2015
Major Currency Index	72.9	73.9	74.0	73.2	74.7	76.4	76.7	76.0	76.8	77.2	77.6	77.6	77.7	77.7
Real GDP	3.7	1.2	2.8	0.1	1.1	2.5	4.1	3.1	2.5	2.8	2.9	3.0	3.0	3.0
GDP Price Index	2.0	1.8	2.3	1.1	1.3	0.6	2.0	1.4	1.7	1.7	1.9	1.9	2.0	2.0
Consumer Price Index	2.3	1.0	2.1	2.2	1.4	0.0	2.6	0.9	1.8	1.8	2.1	2.0	2.1	2.0

Forecasts for interest rates and the Federal Reserve's Major Currency Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index and Consumer Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data for interest rates except LIBOR is from Federal Reserve Release (FRSR) H.15. LIBOR quotes available from *The Wall Street Journal*. Interest rate definitions are same as those in FRSR H.15. Treasury yields are reported on a constant maturity basis. Historical data for Fed's Major Currency Index is from FRSR H.10 and G.5. Historical data for Real GDP and GDP Chained Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index (CPI) history is from the Department of Labor's Bureau of Labor Statistics (BLS). **Figures for 4Q* 2013 Real GDP and GDP Chained Price Index are consensus forecasts based on a special question asked of the panelists' this month.



U.S. 3-Mo. T-Bills & 10-Yr. T-Note Yield





Long-Range Estimates:

The table below contains results of our semi-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are estimates for the years 2015 through 2019 and averages for the five-year periods 2015-2019 and 2020-2024. Apply these projections cautiously. Few economic, demographic and political forces can be evaluated accurately over such long time spans.

			Awera	age For Th	e Year		Five-Year	Averages
Interest Rates		<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	2015-2019	2020-2024
1. Federal Funds Rate	CONSENSUS	0.4	1.7	2.9	3.6	3.9	2.5	3.7
	Top 10 Average	0.8	2.6	3.9	4.2	4.5	3.2	4.4
	Bottom 10 Average	0.2	0.8	1.6	2.6	3.1	1.6	2.9
2. Prime Rate	CONSENSUS	3.5	4.8	6.0	6.6	6.9	5.6	6.7
	Top 10 Average	3.9	5.6	69	7.2	7.6	62	74
	Bottom 10 Average	33	4.1	5.0	5.7	6.1	4.8	5.8
2 LIBOD 2 Mo	CONSENSUS	0.0	2.2	3.0	<u> </u>	4.2	2.0	<u> </u>
5. LIBOR, 5-WO.		1.5	2.2	3.5	4.0	4. 2	2.9	4.0
	Top to Average	1.0	5.5	4.0	5.0	5.2	3.9	5.0
	Bottom 10 Average	0.4	1.1	2.0	2.8	3.3	1.9	3.0
4. Commercial Paper, 1-Mo.	CONSENSUS	0.6	2.0	3.1	3.7	3.9	2.6	3.7
	Top 10 Average	1.0	2.7	3.9	4.3	4.5	3.3	4.3
	Bottom 10 Average	0.3	1.3	2.3	2.9	3.1	2.0	3.0
5. Treasury Bill Yield, 3-Mo.	CONSENSUS	0.5	1.7	2.9	3.5	3.7	2.5	3.6
	Top 10 Average	1.0	2.7	3.9	4.3	4.5	3.3	4.3
	Bottom 10 Average	0.2	0.8	1.7	2.4	3.0	1.6	2.7
6. Treasury Bill Yield, 6-Mo.	CONSENSUS	0.7	2.0	3.1	3.7	3.9	2.7	3.8
•	Top 10 Average	1.2	2.9	4.1	4.5	4.6	3.5	4.5
	Bottom 10 Average	03	1.1	19	2.7	3.1	1.8	2.8
7 Treasury Bill Yield 1-Yr	CONSENSUS	0.9	2.2	3.2	3.8	4.0	2.8	3.9
7. Heastry Dir Heid, 1-11.	Top 10 Average	1.5	3.2	43	47	4.0	2.0	1.6
	Pottom 10 Average	0.4	1.2	4.3	4.7	4.0	1.0	4.0
	Bottolii IO Average	0.4	1.2	2.0	2.0	5.1	1.9	2.9
8. Treasury Note Yield, 2-Yr.	CONSENSUS	1.4	2.6	3.6	4.0	4.3	3.2	4.2
	Top 10 Average	2.0	3.5	4.5	4.9	5.0	4.0	4.9
	Bottom 10 Average	0.8	1.7	2.4	3.1	3.5	2.3	3.3
10. Treasury Note Yield, 5-Yr.	CONSENSUS	2.3	3.3	4.1	4.4	4.6	3.7	4.4
	Top 10 Average	2.9	4.0	4.8	5.1	5.3	4.4	5.1
	Bottom 10 Average	1.7	2.6	3.2	3.5	3.7	2.9	3.6
11. Treasury Note Yield, 10-Yr.	CONSENSUS	3.4	4.1	4.6	4.8	5.0	4.4	4.9
	Top 10 Average	3.9	4.8	5.3	5.6	5.8	5.1	5.6
	Bottom 10 Average	2.8	3.5	3.8	4.0	4.1	3.7	4.0
12. Treasury Bond Yield, 30-Yr.	CONSENSUS	4.3	4.7	5.2	5.5	5.6	5.0	5.5
j i i i i i i i i i i i i i i i i i i i	Top 10 Average	48	55	60	63	65	5.8	62
	Bottom 10 Average	37	4.0	4.4	4.6	47	43	4.6
13 Corporate Aaa Bond Vield	CONSENSUS	49	5.4	5.9	6.2	63	5.7	6.2
15. Colporate Ada Bolidi Ticki	Top 10 Average	 ,	5. 4 6.2	67	7.0	7.2	5.1	7.0
	Top to Average	5.0	0.2	0.7	7.0	7.2	0.5	7.0
12 C	Bottom IO Average	4.2	4.5	4.9	5.2	5.5	4.8	5.5
13. Corporate Baa Bond Yield		5.9	6.3	0.8	7.1	1.4	6./	7.0
	Top 10 Average	6.5	7.1	7.5	7.9	8.1	7.4	7.9
	Bottom 10 Average	5.1	5.4	5.7	6.1	6.1	5.7	6.0
14. State & Local Bonds Yield	CONSENSUS	4.8	5.2	5.6	5.7	5.7	5.4	5.5
	Top 10 Average	5.2	5.9	6.3	6.5	6.6	6.1	6.3
	Bottom 10 Average	4.3	4.5	4.8	4.9	4.9	4.7	4.7
15. Home Mortgage Rate	CONSENSUS	5.1	5.6	6.1	6.4	6.5	5.9	6.4
	Top 10 Average	5.6	6.3	6.9	7.1	7.3	6.6	7.1
	Bottom 10 Average	4.4	5.0	5.3	5.5	5.6	5.2	5.6
A. FRB - Major Currency Index	CONSENSUS	77.8	78.4	78.8	79.1	79.2	78.7	79.7
5	Top 10 Average	81.0	82.3	83.4	84.2	84.4	83.1	84.8
	Bottom 10 Average	74.6	74.3	74.0	73.7	74.0	74.1	74.7
			N. O	X 7 0	(C			
			Year-O	ver-Year, %	% Change		Five-Year	Averages
		<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	2015-2019	2020-2024
B. Real GDP	CONSENSUS	3.0	2.9	2.7	2.6	2.5	2.7	2.4
	Top 10 Average	3.5	3.3	3.1	2.9	2.9	3.1	2.7
	Bottom 10 Average	2.5	2.5	2.3	2.1	2.2	2.3	2.1
C. GDP Chained Price Index	CONSENSUS	2.0	2.1	2.1	2.1	2.1	2.1	2.1
	Top 10 Average	2.5	2.5	2.6	2.5	2.5	2.5	2.5
	Bottom 10 Average	1.5	1.7	1.7	1.7	1.7	1.7	1.7
D. Consumer Price Index	CONSENSUS	2.2	2.3	2.3	2.3	2.3	2.3	2.3
	Top 10 Average	2.6	2.8	2.8	2.8	2.8	2.8	2.8
	Bottom 10 Average	1.7	1.9	1.9	1.9	2.0	1.9	1.9

United Water Rhode Island, Inc. Derivation of Mean Equity Risk Premium Based on a Study Using Holding Period Returns of Public Utilities

		Over A Rated Moody's Public Utility Bonds - AUS Consultants Study (1)
1.	Arithmetic Mean Holding Period Returns on the Standard & Poor's Utility Index 1926- 2012 (2):	10.69 %
2.	Arithmetic Mean Yield on Moody's A Rated Public Utility Yields 1926-2012	(6.53)
3.	Historical Equity Risk Premium	4.16 %
4.	Forecasted Equity Risk Premium Based on PRPM [™] (3)	5.24
5.	Average of Historical and PRPM [™] Equity Risk Premium	<u> </u>

Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1926-2012, (AUS Consultants, 2013).
 (2) Holding period returns are calculated based upon income received (dividends)

and interest) plus the relative change in the market value of a security over a one-year holding period.

(3) The Predictive Risk Premium Model (PRPM[™]) is applied to the risk premium of the monthly total returns of the S&P Utility Index and the monthly yields on Moody's A rated public utility bonds from 1928 - 2012.

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Through Use of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

	<u>1</u>	2	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>
Proxy Group of Nine Water Companies	Value Line Adjusted Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate (3)	ECAPM Cost Rate (4)	Indicated Common Equity Cost Rate (5)
American States Water Co.	0.65	7.09 %	4.44 %	9.05 %	9.67 %	
American Water Works Co., Inc.	0.65	7.09	4.44	9.05	9.67	
Aqua America, Inc.	0.60	7.09	4.44	8.69	9.40	
Artesian Resources Corp.	0.55	7.09	4.44	8.34	9.14	
California Water Service Group	0.60	7.09	4.44	8.69	9.40	
Connecticut Water Service, Inc.	0.75	7.09	4.44	9.76	10.20	
Middlesex Water Company	0.75	7.09	4.44	9.76	10.20	
SJW Corporation	0.85	7.09	4.44	10.47	10.73	
York Water Company	0.70	7.09	4.44	9.40	9.93	
Average	0.68			9.25 %	9.82 %	<u>9.54</u> %
Median	0.65			<u>9.05</u> %	9.67 %	9.36 %

See page 23 for notes.

United Water Rhode Island, Inc. Development of the Market-Required Rate of Return on Common Equity Using the Capital Asset Pricing Model for the Proxy Group of Nine Water Companies Adjusted to Reflect a Forecasted Risk-Free Rate and Market Return

Notes:

(1) For reasons explained in Ms. Ahern's accompanying direct testimony, from the 13 weeks ending February 7, 2014, <u>Value Line Summary & Index</u>, a forecasted 3-5 year total annual market return of 8.74% can be derived by averaging the 13 weeks ending February 7, 2014 forecasted total 3-5 year total appreciation, converting it into an annual market appreciation and adding the <u>Value Line</u> average forecasted annual dividend yield.

The 3-5 year average total market appreciation of 30% produces a four-year average annual return of 6.78% (($1.30^{0.25}$) - 1). When the average annual forecasted dividend yield of 1.96% is added, a total average market return of 8.74% (1.96% + 6.78%) is derived.

The 13 weeks ending February 7, 2014 forecasted total market return of 8.74% minus the risk-free rate of 4.44% (developed in Note 2) is 4.30% (8.74% - 4.44%).

The Predictive Risk Premium Model (PRPM[™]) market equity risk premium of 10.43% is derived by applying the PRPM[™] to the monthly equity risk premium of large company common stocks over the income return on long-term U.S. Government Securities from January 1926 through December 2013.

The Morningstar, Inc. (Ibbotson Associates) calculated arithmetic mean monthly market equity risk premium of 6.55% for the period 1926-2012 results from a total market return of 11.83% less the arithmetic mean income return on long-term U.S. Government Securities of 5.28% (11.83% - 5.28% = 6.55%).

These three expectational risk premiums are then averaged, resulting in a 7.09% market equity risk premium, which is then multiplied by the beta in column 1 of page 1 of this Schedule. ((4.30% + 10.43% + 6.55%)/3).

(2) For reasons explained in Ms. Ahern's direct testimony, the risk-free rate that Ms. Ahern relies upon for her CAPM analysis is the average forecast of 30-year Treasury Note yields per the consensus of nearly 50 economists reported in the <u>Blue</u> <u>Chip Financial Forecasts</u> dated December 1, 2013 and February 1, 2014 (see pages 19 & 20 of this Schedule). The estimates are detailed below:

	<u>30-Year</u>
	Treasury Note Yield
First Quarter 2014	3.90%
Second Quarter 2014	4.00%
Third Quarter 2014	4.10%
Fourth Quarter 2014	4.30%
First Quarter 2015	4.30%
Second Quarter 2015	4.40%
2015 – 2019	5.00%
2020 – 2024	<u>5.50%</u>
Average	4.44%

(3) The traditional Capital Asset Pricing Model (CAPM) is applied using the following formula:

 $R_S = R_F + \beta (R_M - R_F)$

 $\begin{array}{ll} \mbox{Where} & R_S = \mbox{Return rate of common stock} \\ & R_F = \mbox{Risk Free Rate} \\ & \beta & = \mbox{Value Line Adjusted Beta} \\ & R_M = \mbox{Return on the market as a whole} \end{array}$

(4) The empirical CAPM is applied using the following formula:

 $R_{S} = R_{F} + .25 (R_{M} - R_{F}) + .75 \beta (R_{M} - R_{F})$

Where R_s = Return rate of common stock R_F = Risk-Free Rate β = Value Line Adjusted Beta R_M = Return on the market as a whole

Source of Information: Value Line Summary & Index Blue Chip Financial Forecasts, December 1, 2013 & February 1, 2014 Value Line Investment Survey, (Standard Edition) 2013 Ibbotson[®] SBBI[®] Valuation Yearbook, Morningstar, Inc., 2013, Chicago, IL

<u>United Water Rhode Island, Inc.</u> Summary of Cost of Equity Models Applied to the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the <u>Proxy Group of Nine Water Companies</u>

Principal Methods		Proxy Group o Twenty-Sever Non-Price- Regulated	วf า
Discounted Cash Flow Model (DCF) (1)	_	12.02	%
Risk Premium Model (RPM) (2)		10.32	%
Capital Asset Pricing Model (CAPM) (3)		9.67	%
	Average	10.67	%

Notes:

- (1) From page 28 of this Schedule.
- (2) From page 29 of this Schedule.
- (3) From Page 32 of this Schedule.

United Water Rhode Island, Inc. Basis of Selection of Comparable Risk Domestic Non-Price Regulated Companies

			Residual	
	Value Line		Standard Error	Standard
Proxy Group of Nine Water	Adjusted	Unadjusted	of the	Deviation of
Companies	Beta	Beta	Regression	Beta
American States Water Co.	0.70	0.48	3.3620	0.0650
American Water Works Co., Inc.	0.65	0.44	3.0655	0.0610
Aqua America, Inc.	0.60	0.36	2.5902	0.0501
Artesian Resources Corp.	0.55	0.30	2.6477	0.0512
California Water Service Group	0.65	0.40	2.7115	0.0524
Connecticut Water Service, Inc.	0.75	0.58	3.1061	0.0601
Middlesex Water Company	0.70	0.54	2.6637	0.0515
SJW Corporation	0.85	0.70	3.6057	0.0697
York Water Company	0.70	0.48	3.1325	0.0606
Average	0.68	0.48	2.9872	0.0580
Beta Range (+/- 2 std. Devs. of Beta)	0.36	0.60		
2 std. Devs. of Beta	0.12	0.00		
Residual Std. Err. Range (+/- 2 std.				
Devs. of the Residual Std. Err.)	2.7246	3.2498		
,				
Std. dev. of the Res. Std. Err.	0.1313			
2 std. devs. of the Res. Std. Err.	0.2626			

United Water Rhode Island, Inc. Proxy Group of Non-Price Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

Proxy Group of Twenty-Seven Non-	VL Adjusted	Unadjusted	Residual Standard Error of the	Standard Deviation of
Price-Regulated Companies	Beta	Beta	Regression	Beta
Gallagher (Arthur J.)	0.75	0.57	2.9742	0.0575
Baxter Intl Inc.	0.70	0.49	2.9372	0.0568
Bristol-Myers Squibb	0.70	0.50	2.8839	0.0558
Brown & Brown	0.75	0.55	3.1464	0.0608
ConAgra Foods	0.65	0.42	2.7898	0.0540
Capitol Fed. Finl	0.60	0.39	3.0449	0.0589
Quest Diagnostics	0.75	0.59	2.7655	0.0535
Dun & Bradstreet	0.75	0.60	2.9024	0.0561
DaVita HealthCare	0.65	0.46	2.8841	0.0558
Haemonetics Corp.	0.65	0.41	2.7538	0.0533
Kroger Co.	0.60	0.36	2.8843	0.0558
Lancaster Colony	0.70	0.53	3.1660	0.0612
McKesson Corp.	0.75	0.58	3.2240	0.0623
Mercury General	0.70	0.48	3.0066	0.0581
Mead Johnson Nutrition	0.65	0.43	3.1630	0.0824
Annaly Capital Mgmt.	0.65	0.39	3.2022	0.0619
Northwest Bancshares	0.75	0.59	3.0864	0.0597
Owens & Minor	0.70	0.53	3.2368	0.0626
Peoples United Finl	0.65	0.46	2.8665	0.0554
Sherwin-Williams	0.70	0.48	2.9688	0.0574
Smucker (J.M.)	0.70	0.49	2.9429	0.0569
Silgan Holdings	0.75	0.56	2.8926	0.0559
Suburban Propane	0.70	0.54	3.0689	0.0593
Stericycle Inc.	0.70	0.49	2.9267	0.0566
Waste Connections	0.70	0.53	2.7663	0.0535
Weis Markets	0.65	0.42	2.9050	0.0562
Berkley (W.R.)	0.70	0.47	2.9475	0.0570
Average	0.69	0.49	2.9754	0.0583
Proxy Group of Nine Water				
Companies	0.68	0.48	2.9872	0.0580

Basis of Selection of the Group of Non-Price Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

The criteria for selection of the proxy group of twenty-seven non-price regulated companies was that the non-price regulated companies be domestic and reported in Value Line Investment Survey (Standard Edition).

The proxy group of twenty-seven non-price regulated companies were then selected based upon the unadjusted beta range of 0.36 - 0.60 and standard error of the regression range of 2.7246 - 3.2498 of the water proxy group.

These ranges are based upon plus or minus two standard deviations of the unadjusted beta and standard error of the regression. Plus or minus two standard deviations captures 95.50% of the distribution of unadjusted betas and standard errors of the regression.

The standard deviation of the water industry's standard error of the regression is 0.1313. The standard deviation of the standard error of the regression is calculated as follows:

Standard Deviation of the Std. Err. of the Regr. = <u>Standard Error of the Regression</u> $\sqrt{2N}$

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

Thus, 0.1313 = $\frac{2.9872}{\sqrt{518}}$ = $\frac{2.9872}{22.7596}$

Source of Information:	Value Line, Inc., June 15, 2013
	Value Line Investment Survey (Standard Edition)

United Water Rhode Island, Inc. DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies.

Proxy Group of Twenty-Seven Non-Price-Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Reuters Mean Consensus Projected Five Year Growth Rate in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate
Gallagher (Arthur J.	2.99 %	12.50 %	12.00 %	10.70 %	12.36 %	11.89 %	3.17 %	15.06 %
Baxter Intl Inc.	2.88	8.50	7.40	8.50	7.44	7.96	3.00	10.96
Bristol-Myers Squibb	2.69	10.00	13.00	9.10	13.67	11.44	2.84	14.28
Brown & Brown	1.28	14.00	14.00	13.10	15.53	14.16	1.38	15.54
ConAgra Foods	3.06	11.00	8.80	8.70	8.70	9.30	3.21	12.51
Capitol Fed. Finl	2.51	6.00	5.00	3.50	5.00	4.88	2.57	7.45
Quest Diagnostics	2.12	7.00	9.80	10.60	9.84	9.31	2.22	11.53
Dun & Bradstreet	1.37	9.00	9.90	9.90	9.05	9.46	1.44	10.90
DaVita Inc.	-	14.00	12.00	12.30	12.22	12.63	-	NA
Haemonetics Corp.	-	11.00	13.00	12.30	13.00	12.33	-	NA
Kroger Co.	1.51	10.50	7.90	7.20	7.90	8.38	1.58	9.96
Lancaster Colony	1.87	6.00	7.00	NA	7.00	6.67	1.93	8.60
McKesson Corp.	0.59	10.50	19.00	14.00	19.93	15.86	0.63	16.49
Mercury General	5.15	8.00	2.10	2.10	2.10	3.58	5.24	8.82
Mead Johnson Nutrition	1.65	12.00	10.00	11.80	10.75	11.14	1.74	12.88
Annaly Capital Mgmt.	13.89	(2.50)	NA	3.50	(4.70)	3.50	14.13	17.63
Northwest Bancshares, Inc.	3.63	8.50	5.00	5.00	5.00	5.88	3.74	9.62
Owens & Minor	2.63	10.50	13.00	9.00	13.00	11.38	2.78	14.16
Peoples United Fin	4.44	19.00	12.00	6.50	12.07	12.39	4.71	17.10
Sherwin-Williams	1.08	16.50	14.00	14.60	14.10	14.80	1.16	15.96
Smucker (J.M.)	2.27	8.50	8.40	7.70	8.43	8.26	2.37	10.63
Silgan Holdings	1.20	10.50	9.70	10.30	9.73	10.06	1.26	11.32
Suburban Propane	7.81	6.00	23.00	3.00	23.00	13.75	8.35	22.10
Stericycle Inc.	-	12.00	15.00	16.00	15.67	14.67	-	NA
Waste Connections	0.94	12.00	13.00	19.50	13.85	14.59	1.01	15.60
Weis Markets	2.37	3.50	NA	NA	NA	3.50	2.41	5.91
Berkley (W.R.)	0.94	12.50	7.90	9.50	6.91	9.20	0.99	10.19
Average								12.72 %

^{12.02 %}

Median

NA= Not Available NMF= Not Meaningful Figure

(1) Ms. Ahern's application of the DCF model to the domestic, non-price regluated comparable risk companies is identical to the application of the DCF to her proxy group of water companies. She uses the 60 day average price and the spot indicated dividend as of February 4, 2014 for her dividend yield and then adjusts that yield for 1/2 the average projected growth rate in EPS, which is calculated by averaging the 5 year projected growth rate to the adjust of the scale by averaging the 5 year projected growth rate to the adjust of the scale by averaging the start and the adding that growth rate to the adjusted dividend yield.

Source of Information:

Value Line Investment Survey: www.reuters.com Downloaded on 02/05/2014 www.zacks.com Downloaded on 02/05/2014 www.yahoo.com Downloaded on 02/05/2014

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Through Use of a Risk Premium Model Using an Adjusted Total Market Approach

Line No.		Proxy Group of Twenty-Seven Non- Price-Regulated Companies
1.	Prospective Yield on Baa Rated Corporate Bonds (1)	6.01 %
2.	Equity Risk Premium (2)	4.31
3.	Risk Premium Derived Common Equity Cost Rate	<u> </u>

Notes: (1) Average forecast based upon estimates of Baa rated corporate bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated December 1, 2013 and February 1, 2014 (see pages 19 and 20 of this Schedule). The estimates are detailed below.

First Quarter 2014	5.40	%
Second Quarter 2014	5.60	
Third Quarter 2014	5.70	
Fourth Quarter 2014	5.80	
First Quarter 2015	5.90	
Second Quarter 2015	6.00	
2015-2019	6.70	
2020-2024	7.00	
Average	6.01	%

(2) From page 31 of this Schedule.

United Water Rhode Island, Inc. Comparison of Bond Ratings for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

	N Boi Feb	Moody's Bond Rating February 2014		Standard & Poor's Bond Rating February 2014	
Proxy Group of Twenty-Seven Non-Price-Regulated Companies	Bond Rating	Numerical Weighting (1)	Bond Rating	Numerical Weighting (1)	
Gallagher (Arthur J.)	NA		NA		
Baxter Intl Inc.	A3	10.0	А	6.0	
Bristol-Myers Squibb	A2	6.0	A+	5.0	
Brown & Brown	NA		NA		
ConAgra Foods	Baa2	9.0	BB+	11.0	
Capitol Fed. Finl	NA	16.0	NA		
Quest Diagnostics	Baa2	9.0	BBB+	8.0	
Dun & Bradstreet	NA		NA		
DaVita HealthCare	Ba3	13.0	В	15.0	
Haemonetics Corp.	NA		NA		
Kroger Co.	Baa2	9.0	BBB	9.0	
Lancaster Colony	NA		NA		
McKesson Corp.	Baa2	9.0	A-	7.0	
Mercury General	NA		NA		
Mead Johnson Nutrition	NA		BBB-	10.0	
Annaly Capital Mgmt.	NA		NA		
Northwest Bancshares	NA		NA		
Owens & Minor	Ba1	11.0	BBB	9.0	
Peoples United Finl	A3	7.0	BBB+	8.0	
Sherwin-Williams	A3	7.0	А	6.0	
Smucker (J.M.)	A3	7.0	NA		
Silgan Holdings	Ba1	11.0	BB-	13.0	
Suburban Propane	Ba2	12.0	BB-	13.0	
Stericycle Inc.	NA		NA		
Waste Connections	NA		NA		
Weis Markets	NA		NA		
Berkley (W.R.)	Baa2	9.0	BBB+	8.0	
Average	Baa2	9.7	BBB	9.1	

Notes:

(1) From Schedule PMA-7, page 5 of Ms. Ahern's Direct Testimony.

Source of Information: Standard & Poor's Bond Guide January 2014 www.moodys.com; downloaded 2/5/2014

United Water Rhode Island, Inc. Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for the Proxy Group of Non-Price-Regulated Companies <u>Proxy Group of Nine Water Companies</u>

Line No.		Proxy Group of Twenty-Seven Non- Price-Regulated Companies
	Based on SBBI Valuation Yearbook Data:	
1.	Ibbotson Equity Risk Premium (1)	5.60 %
2.	Ibbotson Equity Risk Premium based on $PRPM^{TM}$ (2)	9.33
	Based on Value Line Summary and Index:	
3.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (3)	3.55
4.	Conclusion of Equity Risk Premium (4)	6.16 %
5.	Adjusted Value Line Beta (5)	0.70
6.	Forecasted Equity Risk Premium	4.31 %

- Notes: (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2013 Valuation Yearbook Market Results for Stocks, Bonds, Bills, and Inflation minus the arithmetic mean monthly yield of Moody's Aaa and Aa corporate bonds from 1926 2012. (11.83% 6.23% = 5.60%).
 - (2) The Predictive Risk Premium Model (PRPM[™]) is discussed in Ms. Ahern's accompanying direct testimony. The lbbotson equity risk premium based on the PRPM[™] is derived by applying the PRPM[™] to the monthly risk premiums between lbbotson large company common stock monthly returns minus the average Aaa and Aa corporate monthly bond yields, from January 1928 through December 2013.
 - (3) From page 18 of this schedule.
 - (4) Average of Lines 1, 2, & 3. Average of Lines 1, 2, & 3.
 - (5) Median beta derived from page 32 of this Schedule.

Sources of Information:

Ibbotson® SBBI® 2013 Valuation Yearbook - Market Results for Stocks, Bonds, Bills, and Inflation, Morningstar, Inc., 2013 Chicago, IL.

Value Line Summary and Index Blue Chip Financial Forecasts, December 1,2013 and February 1, 2014

United Water Rhode Island, Inc. Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

Proxy Group of Twenty- Seven Non-Price-Regulated Companies	Value Line Adjusted Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate (3)	ECAPM Cost Rate (4)	Indicated Common Equity Cost Rate (5)
Gallagher (Arthur J.)	0.75	7.09 %	4.44 %	9.76 %	10.20 %	
Baxter Intl Inc.	0.70	7.09	4.44	9.40	9.93	
Bristol-Myers Squibb	0.70	7.09	4.44	9.40	9.93	
Brown & Brown	0.75	7.09	4.44	9.76	10.20	
ConAgra Foods	0.65	7.09	4.44	9.05	9.67	
Capitol Fed. Finl	0.60	7.09	4.44	8.69	9.40	
Quest Diagnostics	0.75	7.09	4.44	9.76	10.20	
Dun & Bradstreet	0.75	7.09	4.44	9.76	10.20	
DaVita HealthCare	0.65	0.00	4.44	4.44	4.44	
Haemonetics Corp.	0.65	0.00	4.44	4.44	4.44	
Kroger Co.	0.60	0.00	4.44	4.44	4.44	
Lancaster Colony	0.70	0.00	4.44	4.44	4.44	
McKesson Corp.	0.75	0.00	4.44	4.44	4.44	
Mercury General	0.70	7.09	4.44	9.40	9.93	
Mead Johnson Nutrition	0.65	7.09	4.44	9.05	9.67	
Annaly Capital Mgmt.	0.65	7.09	4.44	9.05	9.67	
Northwest Bancshares	0.75	7.09	4.44	9.76	10.20	
Owens & Minor	0.70	7.09	4.44	9.40	9.93	
Peoples United Finl	0.65	7.09	4.44	9.05	9.67	
Sherwin-Williams	0.70	7.09	4.44	9.40	9.93	
Smucker (J.M.)	0.70	7.09	4.44	9.40	9.93	
Silgan Holdings	0.75	7.09	4.44	9.76	10.20	
Suburban Propane	0.70	7.09	4.44	9.40	9.93	
Stericycle Inc.	0.70	7.09	4.44	9.40	9.93	
Waste Connections	0.70	7.09	4.44	9.40	9.93	
Weis Markets	0.65	7.09	4.44	9.05	9.67	
Berkley (W.R.)	0.70	7.09	4.44	9.40	9.93	
Average	0.69			<u>8.47</u> %	<u> </u>	<u> </u>
Median	0.70			9.40 %	9.93 %	9.67 %

Notes:

(1) From page 23, note 1 of this Schedule.

(2) From page 23, note 2 of this Schedule.

(3) Derived from the model shown on page 23, note 3 of this Schedule.

(4) Derived from the model shown on page 23, note 4 of this Schedule.

(5) Average of CAPM and ECAPM cost rates.

	Ibbotson Ass	Derivatio	n of Investment Premia for the I	Risk Adjustment Base Decile Portfolios of the	d upon NYSE/AMEX/NASDAQ		
					N	က၊	41
Line No.		Marke	et Capitalization 2014 (11ions)	ı on February 4, 1) (times larger)	Applicable Decile of the NYSE/AMEX/ NASDAQ (2)	Applicable Size Premium (3)	Spread from Applicable Size Premium for (4)
÷	United Water Rhode Island, Inc.			2			
	a. Based Upon the Proxy Group of Nine Water Companies	÷	12.184		10	6.03%	
	b. Based Upon Mr. Kahal's Water Proxy Group	θ	12.627		10	6.03%	
2	Proxy Group of Nine Water Companies	Ŷ	1,680.289	137.9 x	9	1.72%	4.31%
ы	Mr. Kahal's Proxy Group	θ	1,868.672	148.0 x	5 - 6	1.70%	4.33%
			(A)	(B)	(C)	(D)	(E)
			Decile	Number of Companies (millions)	Recent Total Market Capitalization (millions)	Recent Average Market Capitalization (millions)	Size Premium (Return in Excess of CAPM) (2)
	Larges		- 0 -	173 193	<pre>\$ 10,255,341.469 2,219,118.548</pre>	\$ 59,279.430 \$ 11,498.024	-0.37% 0.76%
			ω4	187 202	1,072,861.025 695,897.336	<pre>\$ 5,737.225 \$ 3,445.036</pre>	0.92% 1.14%
			o ع	205 234	473,139.390 377,485.205	\$ 2,307.997 \$ 1.613.185	1.70% 1.72%
			7	317	329,504.738	\$ 1,039.447	1.73%
			00	329 466	z 14,004.230 166,708.095	\$ 357.743	2.70% 2.70%
	Smallee		10	1068	107,517.520 *	\$ 100.672 From lbbotson 2013 \	6.03% earbook
	Notes	(1) Erom	Dage 34 of this	Schooledo			Pag
		(1) FIUIT (2) Glear marke (3) Corre	rage 34 of the second of the s	outedute: In (D) on the bottom c of the proxy group, whi remium to the decile is	of this page. The appropria ich is found in Column 1. provided on Column (E) on	te decile (Column (A the bottom of this pac	() corresponds to the 50 of 50
		(4) Line lexam	No. 1a Column ple, the 4.31%	3 - Line No. 2 Colum in Column 4, Line No.	2 is derived as follows 4.31	mn 3 - Line No. 3 o 6 = 6.03% - 1.72%.	f Column 3 etc For

United Water Rhode Island, Inc.

Exhibit No.___ Schedule PMA-8 Rebuttal Page 33 of 34

United Water Rhode Island, Inc. Market Capitalization of United Water Rhode Island, Inc. and the Proxy Group of Nine Water Companies	
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	Commor Outstan Company Exchange Year (n	Water Rhode Island, Inc.	Lipon the Proxy Group of Nine Water anies	Upon Mr. Kahal's Water Proxy Group	Group of Nine Water Companies	can States Water Co.	an Water Works Co., Inc.	America, Inc.	n Resources Corp.	nia Water Service Group	cticut Water Service, Inc.	sex Water Company	orporation	/ater Company	9	ie of Mr. Kahal's Water Proxy Group
-	n Stock Shares Iding at Fiscal r End 2012 millions)	NA				38.474	176.988	175.209	7.838	41.908	10.939	15.795	18.671	12.919	55.416	61.363
2	Book Valu Share at F Year End 2					÷	ŝ	¢	¢	ŝ	÷	÷	ŝ	ŝ	ŝ	¢
	le per Fiscal 012 (1)	NA				11.815	25.115	7.909	15.078	11.304	17.014	11.499	14.708	7.727	13.574	13.386
က၊	Total Commo Fiscal Year (milli	÷				\$	÷	\$	\$	÷	\$	\$	÷	ŝ	\$	\$
	on Equity at End 2012 ons)	5.915 (4)				454.579	4,444.988	1,385.704	118.180	473.712	186.121	181.632	274.604	99.825	846.594	937.646
41	Closing St Market Pric February 04					\$	\$	\$	\$	\$	°°	\$	\$	\$	\$ 20	\$ 2(
	r cock ce on . 2014	NA	I	I		7.740	1.760	3.370	2.100	2.590	2.620	9.670	8.160	9.850	6.429	6.970
12	Market-to-Book Ratio on February 04, 2014 (2)		206.0 % (5)	213.5 % (7)		234.8 %	166.3	295.5	146.6	199.8	191.7	171.1	191.5	256.9	206.0 %	213.450 %
9	Me Capitali Febru 201 (mill		θ	ф		\$ T	\$	\$	ŝ	ь	ь	ь	ь	ь	\$	\$
	arket zation on iary 04, 4 (3) lions)		12.184 (6)	12.627 (8)		,067.281	,391.019	,094.636	173.222	946.707	356.846	310.688	525.763	256.435	,680.289	,868.672

NA= Not Available

(1) Contest (1) Contest (1) Contest (1) Contest (2) Co

Column 3 / Column 1. Column 4 / Column 2. Column 5 * Column 3. Total capitalization of United Water Rhode Island multiplied by the recommended common equity ratio (11.065M x 53.45% = 5.915M). The market-to-book ratio of United Water Rhode Island, Inc. on February 04, 2014 is assumed to be equal to the market-to-book ratio of the Proxy Group of Nine Water Companies at February 04, 2014. United Water Rhode Island, Inc.'s common stock, if traded, would trade at a market-to-book ratio equal to the average market-to-book ratio at February 04, 2014 of the Proxy Group of Nine Water Companies, 206%, and United Water Rhode Island, Inc.'s market capitalization on February 04, 2014 would therefore have been \$12.184 million.

The market-to-book ratio of United Water Rhode Island, Inc. on February 04, 2014 is assumed to be equal to the market-to-book ratio of the Mr. Kahal's Water Proxy Group at February 04, 2014. Ē

United Water Rhode Island, Inc.'s common stock, if traded, would trade at a market-to-book ratio equal to the average market-to-book ratio at February 04, 2014 of the Mr. Kahal's Water Proxy Group, 213.5%, and United Water Rhode Island, Inc.'s market capitalization on February 04, 2014 would therefore have been \$12.627 million. 8

Source of Information: 2012 Annual Forms 10K yahoo.finance.com

BEFORE THE

RHODE ISLAND PUBLIC UTILITY COMMISSION

EXHIBIT TO ACCOMPANY THE

PREPARED REBUTTAL TESTIMONY

OF

PAULINE M. AHERN, CRRA PRINCIPAL AUS CONSULTANTS

CONCERNING

FAIR RATE OF RETURN

RE: UNITED WATER RHODE ISLAND, INC.

March 2014

United Water Rhode Island, Inc. Example of the Inadequacy of DCF Return Rate Related to Book Value When Market Value Exceeds Book Value

		Base	d on Mr. Kahal's '	nal's Water Proxy Group				
Line No.	-	Mark	(a) et Value	(b) Book Value				
1.	Per Share	\$	28.900 (1)	\$	15.110 (2)			
2.	DCF Cost Rate		9.25% (3)		9.25% (3)			
3.	Return in Dollars	\$	2.673	\$	1.398			
4.	Dividends	\$	0.867 (4)	\$	0.867 (4)			
5.	Growth in Dollars	\$	1.806	\$	0.531			
6.	Return on Market Value (5)		9.25%		4.84%			
7.	Rate of Growth on Market Value (6)		6.25%		1.84%			

Notes:

- (1) Month-end prices from Standard & Poor's Stock Guide, July-December 2013.
 - (2) Derived from page 34 of Schedule PMA-8 Rebuttal.
 - (3) From Schedule MIK-4, page 1 of 5.
 - (4) Dividends per share based upon a 3.00% adjusted dividend yield. \$0.867 = \$28.900 * 3.00%.
 - (5) Line 3 / market value per share (line 1 column (a)).
 - (6) Line 6 dividend yield (9.25% 3.00% = 6.25%).

United Water Rhode Island, Inc. Corrected Common Equity Cost Rate Through Use of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>
Mr. Kahal's Water Utility Group	Value Line Adjusted Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate (3)	ECAPM Cost Rate (4)	Indicated Common Equity Cost Rate (5)
American States Water Co.	0.65	7.09 %	4.44 %	9.05 %	9.67 %	
American Water Works Co., Inc.	0.65	7.09	4.44	9.05	9.67	
Aqua America, Inc.	0.60	7.09	4.44	8.69	9.40	
California Water Service Group	0.60	7.09	4.44	8.69	9.40	
Connecticut Water Service, Inc.	0.75	7.09	4.44	9.76	10.20	
Middlesex Water Company	0.75	7.09	4.44	9.76	10.20	
SJW Corporation	0.85	7.09	4.44	10.47	10.73	
York Water Company	0.70	7.09	4.44	9.40	9.93	
Average	0.69			<u>9.36</u> %	<u>9.90</u> %	<u>9.63</u> %

See page 23 of Exhibit PMA-8 for notes.

NEW REGULATORY FINANCE

Roger A. Morin, PhD

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First Printing, June 2006

Library of Congress Cataloging-in-Publication Data

Morin, Roger A.
New regulatory finance/Roger A. Morin.
p. cm.
Rev. ed. of: Regulatory finance. 1994.
Includes bibliographical references and index.
ISBN-13: 978-0-910325-05-9
ISBN-10: 0-910325-05-7
Public utilities—United States—Finance. 2. Public utilities—Rate of return.
Public utilities—Law and legislation—United States. 4. Capital costs—United States. I. Morin, Roger A. Regulatory finance. II. Public Utilities Reports, Inc. III. Title.

HD2766.M62 2006 363.6068'1---dc22

2006018026

Printed in the United States of America
Chapter 6: Alternative Asset Pricing Models

The model is analogous to the standard CAPM, but with the return on a minimum risk portfolio that is unrelated to market returns, R_z , replacing the risk-free rate, R_F . The model has been empirically tested by Black, Jensen, and Scholes (1972), who find a flatter than predicted SML, consistent with the model and other researchers' findings. An updated version of the Black-Jensen-Scholes study is available in Brealey, Myers, and Allen (2006) and reaches similar conclusions.

The zero-beta CAPM cannot be literally employed to estimate the cost of capital, since the zero-beta portfolio is a statistical construct difficult to replicate. Attempts to estimate the model are formally equivalent to estimating the constants, a and b, in Equation 6-2. A practical alternative is to employ the Empirical CAPM, to which we now turn.

6.3 Empirical CAPM

As discussed in the previous section, several finance scholars have developed refined and expanded versions of the standard CAPM by relaxing the constraints imposed on the CAPM, such as dividend yield, size, and skewness effects. These enhanced CAPMs typically produce a risk-return relationship that is flatter than the CAPM prediction in keeping with the actual observed risk-return relationship. The ECAPM makes use of these empirical findings. The ECAPM estimates the cost of capital with the equation:

$$K = R_F + \dot{\alpha} + \beta \times (MRP - \dot{\alpha})$$
(6-5)

where $\dot{\alpha}$ is the "alpha" of the risk-return line, a constant, and the other symbols are defined as before. All the potential vagaries of the CAPM are telescoped into the constant $\dot{\alpha}$, which must be estimated econometrically from market data. Table 6-2 summarizes¹⁰ the empirical evidence on the magnitude of alpha.¹¹

¹⁰ The technique is formally applied by Litzenberger, Ramaswamy, and Sosin (1980) to public utilities in order to rectify the CAPM's basic shortcomings. Not only do they summarize the criticisms of the CAPM insofar as they affect public utilities, but they also describe the econometric intricacies involved and the methods of circumventing the statistical problems. Essentially, the average monthly returns over a lengthy time period on a large cross-section of securities grouped into portfolios are related to their corresponding betas by statistical regression techniques; that is, Equation 6-5 is estimated from market data. The utility's beta value is substituted into the equation to produce the cost of equity figure. Their own results demonstrate how the standard CAPM underestimates the cost of equity capital of public utilities because of utilities' high dividend yield and return skewness.

¹¹ Adapted from Vilbert (2004).

New Regulatory Finance

TABLE 6-2 EMPIRICAL EVIDENCE ON THE ALPHA FACTOR							
Range of alpha							
- 3.6% to 3.6% - 9.61% to 12.24% 4.08% to 9.36% 10.08% to 13.56% 5.32% to 8.17% 1.63% to 5.04% 4.6%							

For an alpha in the range of 1%-2% and for reasonable values of the market risk premium and the risk-free rate, Equation 6-5 reduces to the following more pragmatic form:

$$K = R_F + 0.25 (R_M - R_F) + 0.75 \beta(R_M - R_F)$$
(6-6)

Over reasonable values of the risk-free rate and the market risk premium, Equation 6-6 produces results that are indistinguishable from the ECAPM of Equation 6-5.¹²

An alpha range of 1%-2% is somewhat lower than that estimated empirically. The use of a lower value for alpha leads to a lower estimate of the cost of capital for low-beta stocks such as regulated utilities. This is because the use of a long-term risk-free rate rather than a short-term risk-free rate already incorporates some of the desired effect of using the ECAPM. That is, the

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

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

$$K = R_F + 0.25(R_M - R_F) + 0.75\beta(R_M - R_F)$$

¹² Typical of the empirical evidence on the validity of the CAPM is a study by Morin (1989) who found that the relationship between the expected return on a security and beta over the period 1926–1984 was given by:

Return = $0.0829 + 0.0520 \beta$

Given that the risk-free rate over the estimation period was approximately 6% and that the market risk premium was 8% during the period of study, the intercept of the observed relationship between return and beta exceeds the risk-free rate by about 2%, or 1/4 of 8%, and that the slope of the relationship is close to 3/4 of 8%. Therefore, the empirical evidence suggests that the expected return on a security is related to its risk by the following approximation:

Chapter 6: Alternative Asset Pricing Models

long-term risk-free rate version of the CAPM has a higher intercept and a flatter slope than the short-term risk-free version which has been tested. Thus, it is reasonable to apply a conservative alpha adjustment. Moreover, the lowering of the tax burden on capital gains and dividend income enacted in 2002 may have decreased the required return for taxable investors, steepening the slope of the ECAPM risk-return trade-off and bring it closer to the CAPM predicted returns.¹³

To illustrate the application of the ECAPM, assume a risk-free rate of 5%, a market risk premium of 7%, and a beta of 0.80. The Empirical CAPM equation (6-6) above yields a cost of equity estimate of 11.0% as follows:

 $K = 5\% + 0.25 (12\% - 5\%) + 0.75 \times 0.80 (12\% - 5\%)$ = 5.0% + 1.8% + 4.2%= 11.0%

As an alternative to specifying alpha, see Example 6-1.

Some have argued that the use of the ECAPM is inconsistent with the use of adjusted betas, such as those supplied by Value Line and Bloomberg. This is because the reason for using the ECAPM is to allow for the tendency of betas to regress toward the mean value of 1.00 over time, and, since Value Line betas are already adjusted for such trend, an ECAPM analysis results in double-counting. This argument is erroneous. Fundamentally, the ECAPM is not an adjustment, increase or decrease, in beta. This is obvious from the fact that the expected return on high beta securities is actually lower than that produced by the CAPM estimate. The ECAPM is a formal recognition that the observed risk-return tradeoff is flatter than predicted by the CAPM based on myriad empirical evidence. The ECAPM and the use of adjusted betas comprised two separate features of asset pricing. Even if a company's beta is estimated accurately, the CAPM still understates the return for low-beta stocks. Even if the ECAPM is used, the return for low-beta securities is understated if the betas are understated. Referring back to Figure 6-1, the ECAPM is a return (vertical axis) adjustment and not a beta (horizontal axis) adjustment. Both adjustments are necessary. Moreover, recall from Chapter 3 that the use of adjusted betas compensates for interest rate sensitivity of utility stocks not captured by unadjusted betas.

¹³ The lowering of the tax burden on capital gains and dividend income has no impact as far as non-taxable institutional investors (pension funds, 401K, and mutual funds) are concerned, and such investors engage in very large amounts of trading on security markets. It is quite plausible that taxable retail investors are relatively inactive traders and that large non-taxable investors have a substantial influence on capital markets.

Journal of Economic Perspectives—Volume 18, Number 3—Summer 2004—Pages 25-46

The Capital Asset Pricing Model: Theory and Evidence

Eugene F. Fama and Kenneth R. French

he capital asset pricing model (CAPM) of William Sharpe (1964) and John Lintner (1965) marks the birth of asset pricing theory (resulting in a Nobel Prize for Sharpe in 1990). Four decades later, the CAPM is still widely used in applications, such as estimating the cost of capital for firms and evaluating the performance of managed portfolios. It is the centerpiece of MBA investment courses. Indeed, it is often the only asset pricing model taught in these courses.¹

The attraction of the CAPM is that it offers powerful and intuitively pleasing predictions about how to measure risk and the relation between expected return and risk. Unfortunately, the empirical record of the model is poor—poor enough to invalidate the way it is used in applications. The CAPM's empirical problems may reflect theoretical failings, the result of many simplifying assumptions. But they may also be caused by difficulties in implementing valid tests of the model. For example, the CAPM says that the risk of a stock should be measured relative to a comprehensive "market portfolio" that in principle can include not just traded financial assets, but also consumer durables, real estate and human capital. Even if we take a narrow view of the model and limit its purview to traded financial assets, is it

¹ Although every asset pricing model is a capital asset pricing model, the finance profession reserves the acronym CAPM for the specific model of Sharpe (1964), Lintner (1965) and Black (1972) discussed here. Thus, throughout the paper we refer to the Sharpe-Lintner-Black model as the CAPM.

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legitimate to limit further the market portfolio to U.S. common stocks (a typical choice), or should the market be expanded to include bonds, and other financial assets, perhaps around the world? In the end, we argue that whether the model's problems reflect weaknesses in the theory or in its empirical implementation, the failure of the CAPM in empirical tests implies that most applications of the model are invalid.

We begin by outlining the logic of the CAPM, focusing on its predictions about risk and expected return. We then review the history of empirical work and what it says about shortcomings of the CAPM that pose challenges to be explained by alternative models.

The Logic of the CAPM

The CAPM builds on the model of portfolio choice developed by Harry Markowitz (1959). In Markowitz's model, an investor selects a portfolio at time t - 1 that produces a stochastic return at t. The model assumes investors are risk averse and, when choosing among portfolios, they care only about the mean and variance of their one-period investment return. As a result, investors choose "mean-variance-efficient" portfolios, in the sense that the portfolios 1) minimize the variance of portfolio return, given expected return, and 2) maximize expected return, given variance. Thus, the Markowitz approach is often called a "mean-variance model."

The portfolio model provides an algebraic condition on asset weights in meanvariance-efficient portfolios. The CAPM turns this algebraic statement into a testable prediction about the relation between risk and expected return by identifying a portfolio that must be efficient if asset prices are to clear the market of all assets.

Sharpe (1964) and Lintner (1965) add two key assumptions to the Markowitz model to identify a portfolio that must be mean-variance-efficient. The first assumption is *complete agreement*: given market clearing asset prices at t - 1, investors agree on the joint distribution of asset returns from t - 1 to t. And this distribution is the true one—that is, it is the distribution from which the returns we use to test the model are drawn. The second assumption is that there is *borrowing and lending at a risk-free rate*, which is the same for all investors and does not depend on the amount borrowed or lent.

Figure 1 describes portfolio opportunities and tells the CAPM story. The horizontal axis shows portfolio risk, measured by the standard deviation of portfolio return; the vertical axis shows expected return. The curve *abc*, which is called the minimum variance frontier, traces combinations of expected return and risk for portfolios of risky assets that minimize return variance at different levels of expected return. (These portfolios do not include risk-free borrowing and lending.) The tradeoff between risk and expected return for minimum variance portfolios is apparent. For example, an investor who wants a high expected return, perhaps at point a, must accept high volatility. At point T, the investor can have an interme-

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diate expected return with lower volatility. If there is no risk-free borrowing or lending, only portfolios above b along abc are mean-variance-efficient, since these portfolios also maximize expected return, given their return variances.

Adding risk-free borrowing and lending turns the efficient set into a straight line. Consider a portfolio that invests the proportion x of portfolio funds in a risk-free security and 1 - x in some portfolio g. If all funds are invested in the risk-free security—that is, they are loaned at the risk-free rate of interest—the result is the point R_f in Figure 1, a portfolio with zero variance and a risk-free rate of return. Combinations of risk-free lending and positive investment in g plot on the straight line between R_f and g. Points to the right of g on the line represent borrowing at the risk-free rate, with the proceeds from the borrowing used to increase investment in portfolio g. In short, portfolios that combine risk-free lending or borrowing with some risky portfolio g plot along a straight line from R_f through g in Figure 1.²

² Formally, the return, expected return and standard deviation of return on portfolios of the risk-free asset f and a risky portfolio g vary with x, the proportion of portfolio funds invested in f, as

$$R_p = xR_f + (1 - x)R_g,$$
$$E(R_p) = xR_f + (1 - x)E(R_g),$$
$$\sigma(R_p) = (1 - x)\sigma(R_g), x \le 1.0,$$

which together imply that the portfolios plot along the line from R_f through g in Figure 1.

To obtain the mean-variance-efficient portfolios available with risk-free borrowing and lending, one swings a line from R_f in Figure 1 up and to the left as far as possible, to the tangency portfolio T. We can then see that all efficient portfolios are combinations of the risk-free asset (either risk-free borrowing or lending) and a single risky tangency portfolio, T. This key result is Tobin's (1958) "separation theorem."

The punch line of the CAPM is now straightforward. With complete agreement about distributions of returns, all investors see the same opportunity set (Figure 1), and they combine the same risky tangency portfolio T with risk-free lending or borrowing. Since all investors hold the same portfolio T of risky assets, it must be the value-weight market portfolio of risky assets. Specifically, each risky asset's weight in the tangency portfolio, which we now call M (for the "market"), must be the total market value of all outstanding units of the asset divided by the total market value of all risky assets. In addition, the risk-free rate must be set (along with the prices of risky assets) to clear the market for risk-free borrowing and lending.

In short, the CAPM assumptions imply that the market portfolio M must be on the minimum variance frontier if the asset market is to clear. This means that the algebraic relation that holds for any minimum variance portfolio must hold for the market portfolio. Specifically, if there are N risky assets,

(Minimum Variance Condition for M) $E(R_i) = E(R_{ZM})$

+
$$[E(R_M) - E(R_{ZM})]\beta_{iM}, i = 1, ..., N.$$

In this equation, $E(R_i)$ is the expected return on asset *i*, and β_{iM} , the market beta of asset *i*, is the covariance of its return with the market return divided by the variance of the market return,

(Market Beta)
$$\beta_{iM} = \frac{\operatorname{cov}(R_i, R_M)}{\sigma^2(R_M)}.$$

The first term on the right-hand side of the minimum variance condition, $E(R_{ZM})$, is the expected return on assets that have market betas equal to zero, which means their returns are uncorrelated with the market return. The second term is a risk premium—the market beta of asset *i*, β_{iM} , times the premium per unit of beta, which is the expected market return, $E(R_M)$, minus $E(R_{ZM})$.

Since the market beta of asset *i* is also the slope in the regression of its return on the market return, a common (and correct) interpretation of beta is that it measures the sensitivity of the asset's return to variation in the market return. But there is another interpretation of beta more in line with the spirit of the portfolio model that underlies the CAPM. The risk of the market portfolio, as measured by the variance of its return (the denominator of β_{iM}), is a weighted average of the covariance risks of the assets in M (the numerators of β_{iM} for different assets). Thus, β_{iM} is the covariance risk of asset *i* in *M* measured relative to the average covariance risk of assets, which is just the variance of the market return.³ In economic terms, β_{iM} is proportional to the risk each dollar invested in asset *i* contributes to the market portfolio.

The last step in the development of the Sharpe-Lintner model is to use the assumption of risk-free borrowing and lending to nail down $E(R_{ZM})$, the expected return on zero-beta assets. A risky asset's return is uncorrelated with the market return—its beta is zero—when the average of the asset's covariances with the returns on other assets just offsets the variance of the asset's return. Such a risky asset is riskless in the market portfolio in the sense that it contributes nothing to the variance of the market return.

When there is risk-free borrowing and lending, the expected return on assets that are uncorrelated with the market return, $E(R_{ZM})$, must equal the risk-free rate, R_f . The relation between expected return and beta then becomes the familiar Sharpe-Lintner CAPM equation,

(Sharpe-Lintner CAPM) $E(R_i) = R_f + [E(R_M) - R_f]\beta_{iM}, i = 1, \dots, N.$

In words, the expected return on any asset *i* is the risk-free interest rate, R_f , plus a risk premium, which is the asset's market beta, β_{iM} , times the premium per unit of beta risk, $E(R_M) - R_f$.

Unrestricted risk-free borrowing and lending is an unrealistic assumption. Fischer Black (1972) develops a version of the CAPM without risk-free borrowing or lending. He shows that the CAPM's key result—that the market portfolio is mean-variance-efficient—can be obtained by instead allowing unrestricted short sales of risky assets. In brief, back in Figure 1, if there is no risk-free asset, investors select portfolios from along the mean-variance-efficient frontier from a to b. Market clearing prices imply that when one weights the efficient portfolios chosen by investors by their (positive) shares of aggregate invested wealth, the resulting portfolio is the market portfolio. The market portfolio is thus a portfolio of the efficient portfolios made up of efficient portfolios are themselves efficient. Thus, the market portfolio is efficient, which means that the minimum variance condition for M given above holds, and it is the expected return-risk relation of the Black CAPM.

The relations between expected return and market beta of the Black and Sharpe-Lintner versions of the CAPM differ only in terms of what each says about $E(R_{ZM})$, the expected return on assets uncorrelated with the market. The Black version says only that $E(R_{ZM})$ must be less than the expected market return, so the

³ Formally, if x_{iM} is the weight of asset *i* in the market portfolio, then the variance of the portfolio's return is

$$r^{2}(R_{M}) = Cov(R_{M}, R_{M}) = Cov\left(\sum_{i=1}^{N} x_{iM}R_{i}, R_{M}\right) = \sum_{i=1}^{N} x_{iM}Cov(R_{i}, R_{M}).$$

premium for beta is positive. In contrast, in the Sharpe-Lintner version of the model, $E(R_{ZM})$ must be the risk-free interest rate, R_f , and the premium per unit of beta risk is $E(R_M) - R_f$.

The assumption that short selling is unrestricted is as unrealistic as unrestricted risk-free borrowing and lending. If there is no risk-free asset and short sales of risky assets are not allowed, mean-variance investors still choose efficient portfolios—points above b on the *abc* curve in Figure 1. But when there is no short selling of risky assets and no risk-free asset, the algebra of portfolio efficiency says that portfolios made up of efficient portfolios are not typically efficient. This means that the market portfolio, which is a portfolio of the efficient portfolios chosen by investors, is not typically efficient. And the CAPM relation between expected return and market beta is lost. This does not rule out predictions about expected return and betas with respect to other efficient portfolios—if theory can specify portfolios that must be efficient if the market is to clear. But so far this has proven impossible.

In short, the familiar CAPM equation relating expected asset returns to their market betas is just an application to the market portfolio of the relation between expected return and portfolio beta that holds in any mean-variance-efficient portfolio. The efficiency of the market portfolio is based on many unrealistic assumptions, including complete agreement and either unrestricted risk-free borrowing and lending or unrestricted short selling of risky assets. But all interesting models involve unrealistic simplifications, which is why they must be tested against data.

Early Empirical Tests

Tests of the CAPM are based on three implications of the relation between expected return and market beta implied by the model. First, expected returns on all assets are linearly related to their betas, and no other variable has marginal explanatory power. Second, the beta premium is positive, meaning that the expected return on the market portfolio exceeds the expected return on assets whose returns are uncorrelated with the market return. Third, in the Sharpe-Lintner version of the model, assets uncorrelated with the market have expected returns equal to the risk-free interest rate, and the beta premium is the expected market return minus the risk-free rate. Most tests of these predictions use either crosssection or time-series regressions. Both approaches date to early tests of the model.

Tests on Risk Premiums

The early cross-section regression tests focus on the Sharpe-Lintner model's predictions about the intercept and slope in the relation between expected return and market beta. The approach is to regress a cross-section of average asset returns on estimates of asset betas. The model predicts that the intercept in these regressions is the risk-free interest rate, R_f , and the coefficient on beta is the expected return on the market in excess of the risk-free rate, $E(R_M) - R_f$.

Two problems in these tests quickly became apparent. First, estimates of beta

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for individual assets are imprecise, creating a measurement error problem when they are used to explain average returns. Second, the regression residuals have common sources of variation, such as industry effects in average returns. Positive correlation in the residuals produces downward bias in the usual ordinary least squares estimates of the standard errors of the cross-section regression slopes.

To improve the precision of estimated betas, researchers such as Blume (1970), Friend and Blume (1970) and Black, Jensen and Scholes (1972) work with portfolios, rather than individual securities. Since expected returns and market betas combine in the same way in portfolios, if the CAPM explains security returns it also explains portfolio returns.⁴ Estimates of beta for diversified portfolios are more precise than estimates for individual securities. Thus, using portfolios in cross-section regressions of average returns on betas reduces the critical errors in variables problem. Grouping, however, shrinks the range of betas and reduces statistical power. To mitigate this problem, researchers sort securities on beta when forming portfolios; the first portfolio contains securities with the lowest betas, and so on, up to the last portfolio with the highest beta assets. This sorting procedure is now standard in empirical tests.

Fama and MacBeth (1973) propose a method for addressing the inference problem caused by correlation of the residuals in cross-section regressions. Instead of estimating a single cross-section regression of average monthly returns on betas, they estimate month-by-month cross-section regressions of monthly returns on betas. The times-series means of the monthly slopes and intercepts, along with the standard errors of the means, are then used to test whether the average premium for beta is positive and whether the average return on assets uncorrelated with the market is equal to the average risk-free interest rate. In this approach, the standard errors of the average intercept and slope are determined by the month-to-month variation in the regression coefficients, which fully captures the effects of residual correlation on variation in the regression coefficients, but sidesteps the problem of actually estimating the correlations. The residual correlations are, in effect, captured via repeated sampling of the regression coefficients. This approach also becomes standard in the literature.

Jensen (1968) was the first to note that the Sharpe-Lintner version of the

⁴ Formally, if x_{ip} , i = 1, ..., N, are the weights for assets in some portfolio p, the expected return and market beta for the portfolio are related to the expected returns and betas of assets as

$$E(R_p) = \sum_{i=1}^N x_{ip} E(R_i)$$
, and $\beta_{pM} = \sum_{i=1}^N x_{ip} \beta_{pM}$.

Thus, the CAPM relation between expected return and beta,

$$E(R_i) = E(R_f) + [E(R_M) - E(R_f)]\beta_{iM},$$

holds when asset i is a portfolio, as well as when i is an individual security.

relation between expected return and market beta also implies a time-series regression test. The Sharpe-Lintner CAPM says that the expected value of an asset's excess return (the asset's return minus the risk-free interest rate, $R_{it} - R_{fl}$) is completely explained by its expected CAPM risk premium (its beta times the expected value of $R_{Mt} - R_{fl}$). This implies that "Jensen's alpha," the intercept term in the time-series regression,

(Time-Series Regression) $R_{it} - R_{ft} = \alpha_i + \beta_{iM}(R_{Mt} - R_{ft}) + \varepsilon_{it}$,

is zero for each asset.

The early tests firmly reject the Sharpe-Lintner version of the CAPM. There is a positive relation between beta and average return, but it is too "flat." Recall that, in cross-section regressions, the Sharpe-Lintner model predicts that the intercept is the risk-free rate and the coefficient on beta is the expected market return in excess of the risk-free rate, $E(R_M) - R_f$ The regressions consistently find that the intercept is greater than the average risk-free rate (typically proxied as the return on a one-month Treasury bill), and the coefficient on beta is less than the average excess market return (proxied as the average return on a portfolio of U.S. common stocks minus the Treasury bill rate). This is true in the early tests, such as Douglas (1968), Black, Jensen and Scholes (1972), Miller and Scholes (1972), Blume and Friend (1973) and Fama and MacBeth (1973), as well as in more recent crosssection regression tests, like Fama and French (1992).

The evidence that the relation between beta and average return is too flat is confirmed in time-series tests, such as Friend and Blume (1970), Black, Jensen and Scholes (1972) and Stambaugh (1982). The intercepts in time-series regressions of excess asset returns on the excess market return are positive for assets with low betas and negative for assets with high betas.

Figure 2 provides an updated example of the evidence. In December of each year, we estimate a preranking beta for every NYSE (1928–2003), AMEX (1963–2003) and NASDAQ (1972–2003) stock in the CRSP (Center for Research in Security Prices of the University of Chicago) database, using two to five years (as available) of prior monthly returns.⁵ We then form ten value-weight portfolios based on these preranking betas and compute their returns for the next twelve months. We repeat this process for each year from 1928 to 2003. The result is 912 monthly returns on ten beta-sorted portfolios. Figure 2 plots each portfolio's average return against its postranking beta, estimated by regressing its monthly returns for 1928–2003 on the return on the CRSP value-weight portfolio of U.S. common stocks.

The Sharpe-Lintner CAPM predicts that the portfolios plot along a straight

⁵ To be included in the sample for year t, a security must have market equity data (price times shares outstanding) for December of t - 1, and CRSP must classify it as ordinary common equity. Thus, we exclude securities such as American Depository Receipts (ADRs) and Real Estate Investment Trusts (REITs).

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Figure 2

Average Annualized Monthly Return versus Beta for Value Weight Portfolios Formed on Prior Beta, 1928–2003



line, with an intercept equal to the risk-free rate, R_f , and a slope equal to the expected excess return on the market, $E(R_M) - R_f$. We use the average one-month Treasury bill rate and the average excess CRSP market return for 1928–2003 to estimate the predicted line in Figure 2. Confirming earlier evidence, the relation between beta and average return for the ten portfolios is much flatter than the Sharpe-Lintner CAPM predicts. The returns on the low beta portfolios are too high, and the returns on the high beta portfolios are too low. For example, the predicted return on the portfolio with the lowest beta is 8.3 percent per year; the actual return is 11.1 percent. The predicted return on the portfolio with the highest beta is 16.8 percent per year; the actual is 13.7 percent.

Although the observed premium per unit of beta is lower than the Sharpe-Lintner model predicts, the relation between average return and beta in Figure 2 is roughly linear. This is consistent with the Black version of the CAPM, which predicts only that the beta premium is positive. Even this less restrictive model, however, eventually succumbs to the data.

Testing Whether Market Betas Explain Expected Returns

The Sharpe-Lintner and Black versions of the CAPM share the prediction that the market portfolio is mean-variance-efficient. This implies that differences in expected return across securities and portfolios are entirely explained by differences in market beta; other variables should add nothing to the explanation of expected return. This prediction plays a prominent role in tests of the CAPM. In the early work, the weapon of choice is cross-section regressions.

In the framework of Fama and MacBeth (1973), one simply adds predetermined explanatory variables to the month-by-month cross-section regressions of

returns on beta. If all differences in expected return are explained by beta, the average slopes on the additional variables should not be reliably different from zero. Clearly, the trick in the cross-section regression approach is to choose specific additional variables likely to expose any problems of the CAPM prediction that, because the market portfolio is efficient, market betas suffice to explain expected asset returns.

For example, in Fama and MacBeth (1973) the additional variables are squared market betas (to test the prediction that the relation between expected return and beta is linear) and residual variances from regressions of returns on the market return (to test the prediction that market beta is the only measure of risk needed to explain expected returns). These variables do not add to the explanation of average returns provided by beta. Thus, the results of Fama and MacBeth (1973) are consistent with the hypothesis that their market proxy—an equal-weight portfolio of NYSE stocks—is on the minimum variance frontier.

The hypothesis that market betas completely explain expected returns can also be tested using time-series regressions. In the time-series regression described above (the excess return on asset *i* regressed on the excess market return), the intercept is the difference between the asset's average excess return and the excess return predicted by the Sharpe-Lintner model, that is, beta times the average excess market return. If the model holds, there is no way to group assets into portfolios whose intercepts are reliably different from zero. For example, the intercepts for a portfolio of stocks with high ratios of earnings to price and a portfolio of stocks with low earning-price ratios should both be zero. Thus, to test the hypothesis that market betas suffice to explain expected returns, one estimates the time-series regression for a set of assets (or portfolios) and then jointly tests the vector of regression intercepts against zero. The trick in this approach is to choose the left-hand-side assets (or portfolios) in a way likely to expose any shortcoming of the CAPM prediction that market betas suffice to explain expected asset returns.

In early applications, researchers use a variety of tests to determine whether the intercepts in a set of time-series regressions are all zero. The tests have the same asymptotic properties, but there is controversy about which has the best small sample properties. Gibbons, Ross and Shanken (1989) settle the debate by providing an F-test on the intercepts that has exact small-sample properties. They also show that the test has a simple economic interpretation. In effect, the test constructs a candidate for the tangency portfolio T in Figure 1 by optimally combining the market proxy and the left-hand-side assets of the time-series regressions. The estimator then tests whether the efficient set provided by the combination of this tangency portfolio and the risk-free asset is reliably superior to the one obtained by combining the risk-free asset with the market proxy alone. In other words, the Gibbons, Ross and Shanken statistic tests whether the market proxy is the tangency portfolio in the set of portfolios that can be constructed by combining the market portfolio with the specific assets used as dependent variables in the time-series regressions.

Enlightened by this insight of Gibbons, Ross and Shanken (1989), one can see

a similar interpretation of the cross-section regression test of whether market betas suffice to explain expected returns. In this case, the test is whether the additional explanatory variables in a cross-section regression identify patterns in the returns on the left-hand-side assets that are not explained by the assets' market betas. This amounts to testing whether the market proxy is on the minimum variance frontier that can be constructed using the market proxy and the left-hand-side assets included in the tests.

An important lesson from this discussion is that time-series and cross-section regressions do not, strictly speaking, test the CAPM. What is literally tested is whether a specific proxy for the market portfolio (typically a portfolio of U.S. common stocks) is efficient in the set of portfolios that can be constructed from it and the left-hand-side assets used in the test. One might conclude from this that the CAPM has never been tested, and prospects for testing it are not good because 1) the set of left-hand-side assets does not include all marketable assets, and 2) data for the true market portfolio of all assets are likely beyond reach (Roll, 1977; more on this later). But this criticism can be leveled at tests of any economic model when the tests are less than exhaustive or when they use proxies for the variables called for by the model.

The bottom line from the early cross-section regression tests of the CAPM, such as Fama and MacBeth (1973), and the early time-series regression tests, like Gibbons (1982) and Stambaugh (1982), is that standard market proxies seem to be on the minimum variance frontier. That is, the central predictions of the Black version of the CAPM, that market betas suffice to explain expected returns and that the risk premium for beta is positive, seem to hold. But the more specific prediction of the Sharpe-Lintner CAPM that the premium per unit of beta is the expected market return minus the risk-free interest rate is consistently rejected.

The success of the Black version of the CAPM in early tests produced a consensus that the model is a good description of expected returns. These early results, coupled with the model's simplicity and intuitive appeal, pushed the CAPM to the forefront of finance.

Recent Tests

Starting in the late 1970s, empirical work appears that challenges even the Black version of the CAPM. Specifically, evidence mounts that much of the variation in expected return is unrelated to market beta.

The first blow is Basu's (1977) evidence that when common stocks are sorted on earnings-price ratios, future returns on high E/P stocks are higher than predicted by the CAPM. Banz (1981) documents a size effect: when stocks are sorted on market capitalization (price times shares outstanding), average returns on small stocks are higher than predicted by the CAPM. Bhandari (1988) finds that high debt-equity ratios (book value of debt over the market value of equity, a measure of leverage) are associated with returns that are too high relative to their market betas.

Finally, Statman (1980) and Rosenberg, Reid and Lanstein (1985) document that stocks with high book-to-market equity ratios (B/M, the ratio of the book value of a common stock to its market value) have high average returns that are not captured by their betas.

There is a theme in the contradictions of the CAPM summarized above. Ratios involving stock prices have information about expected returns missed by market betas. On reflection, this is not surprising. A stock's price depends not only on the expected cash flows it will provide, but also on the expected returns that discount expected cash flows back to the present. Thus, in principle, the cross-section of prices has information about the cross-section of expected returns. (A high expected return implies a high discount rate and a low price.) The cross-section of stock prices is, however, arbitrarily affected by differences in scale (or units). But with a judicious choice of scaling variable X, the ratio X/P can reveal differences in the cross-section of expected stock returns. Such ratios are thus prime candidates to expose shortcomings of asset pricing models—in the case of the CAPM, shortcomings of the prediction that market betas suffice to explain expected returns (Ball, 1978). The contradictions of the CAPM summarized above suggest that earnings-price, debt-equity and book-to-market ratios indeed play this role.

Fama and French (1992) update and synthesize the evidence on the empirical failures of the CAPM. Using the cross-section regression approach, they confirm that size, earnings-price, debt-equity and book-to-market ratios add to the explanation of expected stock returns provided by market beta. Fama and French (1996) reach the same conclusion using the time-series regression approach applied to portfolios of stocks sorted on price ratios. They also find that different price ratios have much the same information about expected returns. This is not surprising given that price is the common driving force in the price ratios, and the numerators are just scaling variables used to extract the information in price about expected returns.

Fama and French (1992) also confirm the evidence (Reinganum, 1981; Stambaugh, 1982; Lakonishok and Shapiro, 1986) that the relation between average return and beta for common stocks is even flatter after the sample periods used in the early empirical work on the CAPM. The estimate of the beta premium is, however, clouded by statistical uncertainty (a large standard error). Kothari, Shanken and Sloan (1995) try to resuscitate the Sharpe-Lintner CAPM by arguing that the weak relation between average return and beta is just a chance result. But the strong evidence that other variables capture variation in expected return missed by beta makes this argument irrelevant. If betas do not suffice to explain expected returns, the market portfolio is not efficient, and the CAPM is dead in its tracks. Evidence on the size of the market premium can neither save the model nor further doom it.

The synthesis of the evidence on the empirical problems of the CAPM provided by Fama and French (1992) serves as a catalyst, marking the point when it is generally acknowledged that the CAPM has potentially fatal problems. Research then turns to explanations.

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One possibility is that the CAPM's problems are spurious, the result of data dredging—publication-hungry researchers scouring the data and unearthing contradictions that occur in specific samples as a result of chance. A standard response to this concern is to test for similar findings in other samples. Chan, Hamao and Lakonishok (1991) find a strong relation between book-to-market equity (B/M) and average return for Japanese stocks. Capaul, Rowley and Sharpe (1993) observe a similar B/M effect in four European stock markets and in Japan. Fama and French (1998) find that the price ratios that produce problems for the CAPM in U.S. data show up in the same way in the stock returns of twelve non-U.S. major markets, and they are present in emerging market returns. This evidence suggests that the contradictions of the CAPM associated with price ratios are not sample specific.

Explanations: Irrational Pricing or Risk

Among those who conclude that the empirical failures of the CAPM are fatal, two stories emerge. On one side are the behavioralists. Their view is based on evidence that stocks with high ratios of book value to market price are typically firms that have fallen on bad times, while low B/M is associated with growth firms (Lakonishok, Shleifer and Vishny, 1994; Fama and French, 1995). The behavioralists argue that sorting firms on book-to-market ratios exposes investor overreaction to good and bad times. Investors overextrapolate past performance, resulting in stock prices that are too high for growth (low B/M) firms and too low for distressed (high B/M, so-called value) firms. When the overreaction is eventually corrected, the result is high returns for value stocks and low returns for growth stocks. Proponents of this view include DeBondt and Thaler (1987), Lakonishok, Shleifer and Vishny (1994) and Haugen (1995).

The second story for explaining the empirical contradictions of the CAPM is that they point to the need for a more complicated asset pricing model. The CAPM is based on many unrealistic assumptions. For example, the assumption that investors care only about the mean and variance of one-period portfolio returns is extreme. It is reasonable that investors also care about how their portfolio return covaries with labor income and future investment opportunities, so a portfolio's return variance misses important dimensions of risk. If so, market beta is not a complete description of an asset's risk, and we should not be surprised to find that differences in expected return are not completely explained by differences in beta. In this view, the search should turn to asset pricing models that do a better job explaining average returns.

Merton's (1973) intertemporal capital asset pricing model (ICAPM) is a natural extension of the CAPM. The ICAPM begins with a different assumption about investor objectives. In the CAPM, investors care only about the wealth their portfolio produces at the end of the current period. In the ICAPM, investors are concerned not only with their end-of-period payoff, but also with the opportunities

they will have to consume or invest the payoff. Thus, when choosing a portfolio at time t - 1, ICAPM investors consider how their wealth at t might vary with future *state variables*, including labor income, the prices of consumption goods and the nature of portfolio opportunities at t, and expectations about the labor income, consumption and investment opportunities to be available after t.

Like CAPM investors, ICAPM investors prefer high expected return and low return variance. But ICAPM investors are also concerned with the covariances of portfolio returns with state variables. As a result, optimal portfolios are "multifactor efficient," which means they have the largest possible expected returns, given their return variances and the covariances of their returns with the relevant state variables.

Fama (1996) shows that the ICAPM generalizes the logic of the CAPM. That is, if there is risk-free borrowing and lending or if short sales of risky assets are allowed, market clearing prices imply that the market portfolio is multifactor efficient. Moreover, multifactor efficiency implies a relation between expected return and beta risks, but it requires additional betas, along with a market beta, to explain expected returns.

An ideal implementation of the ICAPM would specify the state variables that affect expected returns. Fama and French (1993) take a more indirect approach, perhaps more in the spirit of Ross's (1976) arbitrage pricing theory. They argue that though size and book-to-market equity are not themselves state variables, the higher average returns on small stocks and high book-to-market stocks reflect unidentified state variables that produce undiversifiable risks (covariances) in returns that are not captured by the market return and are priced separately from market betas. In support of this claim, they show that the returns on the stocks of small firms covary more with one another than with returns on the stocks of large firms, and returns on high book-to-market (value) stocks covary more with one another than with returns on low book-to-market (growth) stocks. Fama and French (1995) show that there are similar size and book-to-market patterns in the covariation of fundamentals like earnings and sales.

Based on this evidence, Fama and French (1993, 1996) propose a three-factor model for expected returns,

(Three-Factor Model) $E(R_{it}) - R_{ft} = \beta_{iM}[E(R_{Mt}) - R_{ft}]$

 $+ \beta_{is} E(SMB_t) + \beta_{ih} E(HML_t).$

In this equation, SMB_t (small minus big) is the difference between the returns on diversified portfolios of small and big stocks, HML_t (high minus low) is the difference between the returns on diversified portfolios of high and low B/M stocks, and the betas are slopes in the multiple regression of $R_{it} - R_{ft}$ on $R_{Mt} - R_{ft}$, SMB_t and HML_t .

For perspective, the average value of the market premium $R_{Mt} - R_{ft}$ for 1927–2003 is 8.3 percent per year, which is 3.5 standard errors from zero. The

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average values of SMB_t , and HML_t are 3.6 percent and 5.0 percent per year, and they are 2.1 and 3.1 standard errors from zero. All three premiums are volatile, with annual standard deviations of 21.0 percent $(R_{Mt} - R_{ft})$, 14.6 percent (SMB_t) and 14.2 percent (HML_t) per year. Although the average values of the premiums are large, high volatility implies substantial uncertainty about the true expected premiums.

One implication of the expected return equation of the three-factor model is that the intercept α_i in the time-series regression,

$$R_{it} - R_{ft} = \alpha_i + \beta_{iM}(R_{Mt} - R_{ft}) + \beta_{is}SM\beta_t + \beta_{ih}HML_t + \varepsilon_{it},$$

is zero for all assets i. Using this criterion, Fama and French (1993, 1996) find that the model captures much of the variation in average return for portfolios formed on size, book-to-market equity and other price ratios that cause problems for the CAPM. Fama and French (1998) show that an international version of the model performs better than an international CAPM in describing average returns on portfolios formed on scaled price variables for stocks in 13 major markets.

The three-factor model is now widely used in empirical research that requires a model of expected returns. Estimates of α_i from the time-series regression above are used to calibrate how rapidly stock prices respond to new information (for example, Loughran and Ritter, 1995; Mitchell and Stafford, 2000). They are also used to measure the special information of portfolio managers, for example, in Carhart's (1997) study of mutual fund performance. Among practitioners like Ibbotson Associates, the model is offered as an alternative to the CAPM for estimating the cost of equity capital.

From a theoretical perspective, the main shortcoming of the three-factor model is its empirical motivation. The small-minus-big (SMB) and high-minus-low (HML) explanatory returns are not motivated by predictions about state variables of concern to investors. Instead they are brute force constructs meant to capture the patterns uncovered by previous work on how average stock returns vary with size and the book-to-market equity ratio.

But this concern is not fatal. The ICAPM does not require that the additional portfolios used along with the market portfolio to explain expected returns "mimic" the relevant state variables. In both the ICAPM and the arbitrage pricing theory, it suffices that the additional portfolios are well diversified (in the terminology of Fama, 1996, they are multifactor minimum variance) and that they are sufficiently different from the market portfolio to capture covariation in returns and variation in expected returns missed by the market portfolio. Thus, adding diversified portfolios that capture covariation in returns and variation in average returns left unexplained by the market is in the spirit of both the ICAPM and the Ross's arbitrage pricing theory.

The behavioralists are not impressed by the evidence for a risk-based explanation of the failures of the CAPM. They typically concede that the three-factor model captures covariation in returns missed by the market return and that it picks

up much of the size and value effects in average returns left unexplained by the CAPM. But their view is that the average return premium associated with the model's book-to-market factor—which does the heavy lifting in the improvements to the CAPM—is itself the result of investor overreaction that happens to be correlated across firms in a way that just looks like a risk story. In short, in the behavioral view, the market tries to set CAPM prices, and violations of the CAPM are due to mispricing.

The conflict between the behavioral irrational pricing story and the rational risk story for the empirical failures of the CAPM leaves us at a timeworn impasse. Fama (1970) emphasizes that the hypothesis that prices properly reflect available information must be tested in the context of a model of expected returns, like the CAPM. Intuitively, to test whether prices are rational, one must take a stand on what the market is trying to do in setting prices—that is, what is risk and what is the relation between expected return and risk? When tests reject the CAPM, one cannot say whether the problem is its assumption that prices are rational (the behavioral view) or violations of other assumptions that are also necessary to produce the CAPM (our position).

Fortunately, for some applications, the way one uses the three-factor model does not depend on one's view about whether its average return premiums are the rational result of underlying state variable risks, the result of irrational investor behavior or sample specific results of chance. For example, when measuring the response of stock prices to new information or when evaluating the performance of managed portfolios, one wants to account for known patterns in returns and average returns for the period examined, whatever their source. Similarly, when estimating the cost of equity capital, one might be unconcerned with whether expected return premiums are rational or irrational since they are in either case part of the opportunity cost of equity capital (Stein, 1996). But the cost of capital is forward looking, so if the premiums are sample specific they are irrelevant.

The three-factor model is hardly a panacea. Its most serious problem is the momentum effect of Jegadeesh and Titman (1993). Stocks that do well relative to the market over the last three to twelve months tend to continue to do well for the next few months, and stocks that do poorly continue to do poorly. This momentum effect is distinct from the value effect captured by book-to-market equity and other price ratios. Moreover, the momentum effect is left unexplained by the three-factor model, as well as by the CAPM. Following Carhart (1997), one response is to add a momentum factor (the difference between the returns on diversified portfolios of short-term winners and losers) to the three-factor model. This step is again legitimate in applications where the goal is to abstract from known patterns in average returns to uncover information-specific or manager-specific effects. But since the momentum effect is short-lived, it is largely irrelevant for estimates of the cost of equity capital.

Another strand of research points to problems in both the three-factor model and the CAPM. Frankel and Lee (1998), Dechow, Hutton and Sloan (1999), Piotroski (2000) and others show that in portfolios formed on price ratios like book-to-market equity, stocks with higher expected cash flows have higher average returns that are not captured by the three-factor model or the CAPM. The authors interpret their results as evidence that stock prices are irrational, in the sense that they do not reflect available information about expected profitability.

In truth, however, one can't tell whether the problem is bad pricing or a bad asset pricing model. A stock's price can always be expressed as the present value of expected future cash flows discounted at the expected return on the stock (Campbell and Shiller, 1989; Vuolteenaho, 2002). It follows that if two stocks have the same price, the one with higher expected cash flows must have a higher expected return. This holds true whether pricing is rational or irrational. Thus, when one observes a positive relation between expected cash flows and expected returns that is left unexplained by the CAPM or the three-factor model, one can't tell whether it is the result of irrational pricing or a misspecified asset pricing model.

The Market Proxy Problem

Roll (1977) argues that the CAPM has never been tested and probably never will be. The problem is that the market portfolio at the heart of the model is theoretically and empirically elusive. It is not theoretically clear which assets (for example, human capital) can legitimately be excluded from the market portfolio, and data availability substantially limits the assets that are included. As a result, tests of the CAPM are forced to use proxies for the market portfolio, in effect testing whether the proxies are on the minimum variance frontier. Roll argues that because the tests use proxies, not the true market portfolio, we learn nothing about the CAPM.

We are more pragmatic. The relation between expected return and market beta of the CAPM is just the minimum variance condition that holds in any efficient portfolio, applied to the market portfolio. Thus, if we can find a market proxy that is on the minimum variance frontier, it can be used to describe differences in expected returns, and we would be happy to use it for this purpose. The strong rejections of the CAPM described above, however, say that researchers have not uncovered a reasonable market proxy that is close to the minimum variance frontier. If researchers are constrained to reasonable proxies, we doubt they ever will.

Our pessimism is fueled by several empirical results. Stambaugh (1982) tests the CAPM using a range of market portfolios that include, in addition to U.S. common stocks, corporate and government bonds, preferred stocks, real estate and other consumer durables. He finds that tests of the CAPM are not sensitive to expanding the market proxy beyond common stocks, basically because the volatility of expanded market returns is dominated by the volatility of stock returns.

One need not be convinced by Stambaugh's (1982) results since his market proxies are limited to U.S. assets. If international capital markets are open and asset prices conform to an international version of the CAPM, the market portfolio

should include international assets. Fama and French (1998) find, however, that betas for a global stock market portfolio cannot explain the high average returns observed around the world on stocks with high book-to-market or high earnings-price ratios.

A major problem for the CAPM is that portfolios formed by sorting stocks on price ratios produce a wide range of average returns, but the average returns are not positively related to market betas (Lakonishok, Shleifer and Vishny, 1994; Fama and French, 1996, 1998). The problem is illustrated in Figure 3, which shows average returns and betas (calculated with respect to the CRSP value-weight portfolio of NYSE, AMEX and NASDAQ stocks) for July 1963 to December 2003 for ten portfolios of U.S. stocks formed annually on sorted values of the book-to-market equity ratio (B/M).⁶

Average returns on the B/M portfolios increase almost monotonically, from 10.1 percent per year for the lowest B/M group (portfolio 1) to an impressive 16.7 percent for the highest (portfolio 10). But the positive relation between beta and average return predicted by the CAPM is notably absent. For example, the portfolio with the lowest book-to-market ratio has the highest beta but the lowest average return. The estimated beta for the portfolio with the highest book-tomarket ratio and the highest average return is only 0.98. With an average annualized value of the riskfree interest rate, R_f , of 5.8 percent and an average annualized market premium, $R_M - R_f$, of 11.3 percent, the Sharpe-Lintner CAPM predicts an average return of 11.8 percent for the lowest B/M portfolio and 11.2 percent for the highest, far from the observed values, 10.1 and 16.7 percent. For the Sharpe-Lintner model to "work" on these portfolios, their market betas must change dramatically, from 1.09 to 0.78 for the lowest B/M portfolio and from 0.98 to 1.98 for the highest. We judge it unlikely that alternative proxies for the market portfolio will produce betas and a market premium that can explain the average returns on these portfolios.

It is always possible that researchers will redeem the CAPM by finding a reasonable proxy for the market portfolio that is on the minimum variance frontier. We emphasize, however, that this possibility cannot be used to justify the way the CAPM is currently applied. The problem is that applications typically use the same

⁶ Stock return data are from CRSP, and book equity data are from Compustat and the Moody's Industrials, Transportation, Utilities and Financials manuals. Stocks are allocated to ten portfolios at the end of June of each year t (1963 to 2003) using the ratio of book equity for the fiscal year ending in calendar year t - 1, divided by market equity at the end of December of t - 1. Book equity is the book value of stockholders' equity, plus balance sheet deferred taxes and investment tax credit (if available), minus the book value of preferred stock. Depending on availability, we use the redemption, liquidation or par value (in that order) to estimate the book value of preferred stock. Stockholders' equity as the book value of common equity plus the par value of preferred stock or the book value of assets minus total liabilities (in that order). The portfolios for year t include NYSE (1963–2003), AMEX (1963–2003) and NASDAQ (1972–2003) stocks with positive book equity in t - 1 and market equity (from CRSP) for December of t - 1 and June of t. The portfolios exclude securities CRSP does not classify as ordinary common equity. The breakpoints for year t use only securities that are on the NYSE in June of year t.

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Figure 3

Average Annualized Monthly Return versus Beta for Value Weight Portfolios Formed on B/M, 1963–2003



market proxies, like the value-weight portfolio of U.S. stocks, that lead to rejections of the model in empirical tests. The contradictions of the CAPM observed when such proxies are used in tests of the model show up as bad estimates of expected returns in applications; for example, estimates of the cost of equity capital that are too low (relative to historical average returns) for small stocks and for stocks with high book-to-market equity ratios. In short, if a market proxy does not work in tests of the CAPM, it does not work in applications.

Conclusions

The version of the CAPM developed by Sharpe (1964) and Lintner (1965) has never been an empirical success. In the early empirical work, the Black (1972) version of the model, which can accommodate a flatter tradeoff of average return for market beta, has some success. But in the late 1970s, research begins to uncover variables like size, various price ratios and momentum that add to the explanation of average returns provided by beta. The problems are serious enough to invalidate most applications of the CAPM.

For example, finance textbooks often recommend using the Sharpe-Lintner CAPM risk-return relation to estimate the cost of equity capital. The prescription is to estimate a stock's market beta and combine it with the risk-free interest rate and the average market risk premium to produce an estimate of the cost of equity. The typical market portfolio in these exercises includes just U.S. common stocks. But empirical work, old and new, tells us that the relation between beta and average return is flatter than predicted by the Sharpe-Lintner version of the CAPM. As a

result, CAPM estimates of the cost of equity for high beta stocks are too high (relative to historical average returns) and estimates for low beta stocks are too low (Friend and Blume, 1970). Similarly, if the high average returns on value stocks (with high book-to-market ratios) imply high expected returns, CAPM cost of equity estimates for such stocks are too low.⁷

The CAPM is also often used to measure the performance of mutual funds and other managed portfolios. The approach, dating to Jensen (1968), is to estimate the CAPM time-series regression for a portfolio and use the intercept (Jensen's alpha) to measure abnormal performance. The problem is that, because of the empirical failings of the CAPM, even passively managed stock portfolios produce abnormal returns if their investment strategies involve tilts toward CAPM problems (Elton, Gruber, Das and Hlavka, 1993). For example, funds that concentrate on low beta stocks, small stocks or value stocks will tend to produce positive abnormal returns relative to the predictions of the Sharpe-Lintner CAPM, even when the fund managers have no special talent for picking winners.

The CAPM, like Markowitz's (1952, 1959) portfolio model on which it is built, is nevertheless a theoretical tour de force. We continue to teach the CAPM as an introduction to the fundamental concepts of portfolio theory and asset pricing, to be built on by more complicated models like Merton's (1973) ICAPM. But we also warn students that despite its seductive simplicity, the CAPM's empirical problems probably invalidate its use in applications.

■ We gratefully acknowledge the comments of John Cochrane, George Constantinides, Richard Leftwich, Andrei Shleifer, René Stulz and Timothy Taylor.

⁷ The problems are compounded by the large standard errors of estimates of the market premium and of betas for individual stocks, which probably suffice to make CAPM estimates of the cost of equity rather meaningless, even if the CAPM holds (Fama and French, 1997; Pastor and Stambaugh, 1999). For example, using the U.S. Treasury bill rate as the risk-free interest rate and the CRSP value-weight portfolio of publicly traded U.S. common stocks, the average value of the equity premium $R_{Ml} - R_{fl}$ for 1927–2003 is 8.3 percent per year, with a standard error of 2.4 percent. The two standard error range thus runs from 3.5 percent to 13.1 percent, which is sufficient to make most projects appear either profitable or unprofitable. This problem is, however, hardly special to the CAPM. For example, expected returns in all versions of Merton's (1973) ICAPM include a market beta and the expected market premium. Also, as noted earlier the expected values of the size and book-to-market premiums in the Fama-French three-factor model are also estimated with substantial error. The Capital Asset Pricing Model: Theory and Evidence 45

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ORIGINAL ARTICLE

New approach to estimating the cost of common equity capital for public utilities

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Published online: 26 August 2011 © Springer Science+Business Media, LLC 2011

Abstract The regulatory process for setting public utilities' allowed rate of return on common equity has generally used the Gordon DCF, CAPM and Risk Premium specifications to estimate the cost of common equity. Despite the widely known problems with these models, there has been little movement to adopt more recently developed asset pricing models to provide additional evidence for estimating the cost of capital. This paper presents, validates empirically and applies a general yet simple consumption-based asset pricing specification to model the risk-return relationship for stocks and estimate the cost of common equity for public utilities. The model is not necessarily superior to other models in its practical results, yet these results do indicate that it should be used to provide additional estimates of the cost of common equity. Additionally, the model raises doubts as to whether assets such as utility stocks are a consumption (business cycle) hedge.

Keywords Public utilities · Cost of capital · GARCH · Consumption asset pricing model

JEL Classification G12 · L94 · L95

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1 Introduction

Following electricity deregulation with the National Energy Policy Act of 1992, the estimation of the cost of common equity capital remains a critical component of the utility rate-of-return regulatory process. Since the cost of common equity is not observable in capital markets, it must be inferred from asset pricing models. The models that are commonly applied in regulatory proceedings are the Gordon (1974) Discounted Cash Flow (DCF), the Capital Asset Pricing (CAPM) and Risk Premium Models. There are other tools used to estimate the cost of common equity such as comparable earnings or earnings-to-price ratios, but they are not asset pricing models. The empirical literature on the CAPM is vast {Fama and French (2004)} and the CAPM is used by a number of US regulatory jurisdictions. The DCF model has not been empirically tested to the same extent as the CAPM, yet it is considered by many US regulatory jurisdictions.

The purpose of this paper is to present, test empirically and apply a recently developed general consumption-based asset pricing model that estimates the risk-return relationship directly from asset pricing data and, when estimated with recently developed time series methods, produces a prediction of the equity risk premium that is driven by its predicted volatility. The predicted risk premium is then added to a riskfree rate of return to provide an estimate of the cost of common equity. We predict two forms of the equity risk premium with the model, the risk premium net of the risk-free rate and the equity-to-debt risk premium (equity risk premium net of the relevant bond yield for the company's stock). Either can be applied to predict the common equity cost of capital for a public utility. Although the model is tested and applied to public utilities for rate of return regulation, it can be used to estimate the cost of capital for any stock. Section 2 reviews the asset pricing models typically used in public utility rate cases and the generalized consumption asset pricing model we propose to estimate the cost of common equity. Section 3 discusses the data and the empirical testing of the consumption asset pricing model. Section 4 reviews the application of the model and compares it with the DCF and CAPM results. Section 5 is the conclusion.

2 DCF, CAPM and consumption asset pricing model

2.1 DCF and CAPM approaches

The standard DCF model frequently used in estimative the cost rate of common equity in regulatory proceedings is defined by the following equation:

$$k = D_0 (1 + g) / P_0 + g,$$

where k is the expected return on common equity; D_0 is the current dividend per share; g is the expected dividend per share growth rate; and P_0 is the current market price.

The DCF was developed by Gordon (1974) specifically for regulatory purposes. Underlying the DCF model is the theory that the present value of an expected future stream of net cash flows during the investment holding period can be determined by discounting those cash flows at the cost of capital, or the investors' capitalization rate. DCF theory indicates that an investor buys a stock for an expected total return rate which is derived from cash flows received in the form of dividends plus appreciation in market price (the expected growth rate) over the investment holding period. Mathematically, the expected dividend yield $(D_0(1 + g)/P_0)$ on market price plus an expected growth rate equals the capitalization rate, i.e., the expected return on common equity.

The standard DCF contains several restrictive assumptions, the most contentious of which during utility cost of capital proceedings is typically that dividends per share (DPS), book value per share (BVPS), earnings per share (EPS) as well as market price grow at the same rate in perpetuity. There is also considerable contention over the proper proxy for g, prospective or historical growth in DPS, BVPS, EPS and market price and over what time period. In addition, although the standard DCF described above is a single stage annual growth model, there is considerable discussion over the use of multiple stage growth models during regulatory proceedings. Some analysts use the discrete version and others use the continuous version of the DCF model. Solving these models for k, the cost of common equity, results in differing equations to solve for k. The equation above is from the discrete version. The continuous version uses the current dividend yield and is not adjusted by g, which results in a lower estimate for k. Because of these and other restrictive assumptions that require numerous subjective judgments in application, it is often difficult for regulatory commissions to reconcile the frequently large disparities in rates of return on common equity recommended by various parties in a public utility rate case.

The CAPM model is defined by the following equation:

$$k=R_f+\beta\left(R_m-R_f\right),$$

where k is the expected return on common equity; R_f is the expected risk-free rate of return; β is the expected beta; and R_m is the expected market return.

CAPM theory defines risk as the co-variability of a security's returns with the market's returns or β , also known as systematic or market risk, with the market beta being defined as 1.0. Because CAPM theory assumes that all investors hold perfectly diversified portfolios, they are presumed to be exposed only to systematic risk and the market (according to the model) will not reward them a risk premium for unsystematic or non-market risk. In other words, the CAPM presumes that investors require compensation only for systematic or market risks which are due to macroeconomic and other events that affect the returns on all assets. Mathematically, the CAPM is applied by adding a forward-looking risk-free rate of return to an expected market equity risk premium adjusted proportionately by the expected beta to reflect the systematic risk.

As with the DCF, there is considerable contention during regulatory cost of capital proceedings as to the proper proxies for all components of the CAPM: the R_f , the R_m , as well as β . In addition, the CAPM assumption that the market will only reward investors for systematic or market risk is extremely restrictive when estimating the expected return on common equity for a single asset such as a single jurisdictional regulated operating utility. Additionally, this assumption requires that the investor have a perfectly diversified portfolio, that is, one with no unsystematic risk. Since

this assumption is not applicable, estimating the cost of common equity capital for a single utility's common equity undoubtedly will not reflect the risk actually faced by the imperfectly diversified investor.

As will be discussed in the next section, our application of the risk premium approach, the consumption asset pricing model and GARCH¹ rest on minimal assumptions and restrictions and therefore requires considerably less judgment in its application.

2.2 Risk premium approach, consumption asset pricing models, and GARCH

A widely used model to estimate the cost of common equity capital for public utilities is the risk premium approach. This approach often estimates the expected rate of return as the long-term historic mean of the realized risk premium above an historic yield plus the current yield of the relevant bond applicable to a specific utility or peer group of utilities. Litigants in public utility rate proceedings debate the choice of inputs to estimate the risk premium as well as how far back to reach into history to collect data for calculating an average that is representative of a forward-looking premium.

It is surprising that, as popular as the risk premium method is in public utility rate cases, the intuitively appealing general consumption-based asset pricing model, with its minimal assumptions and strong theoretical foundation, has not been applied to estimate the cost of common equity capital for public utilities. The model provides projections of the conditional expected risk premium on an asset based on its relation to its predicted conditional volatility. This model generalizes the well known special case asset pricing models such as the Merton (1973) intertemporal capital asset pricing model, Campbell (1993) intertemporal asset pricing model, and the habit-persistence model of Campbell and Cochrane (1999), which are special cases of the general model. The relation of the model to their specialized cases can be found in Cochrane (2006) and Cochrane (2007). The approach of consumption asset pricing models is to make investment decisions that maximize investors' utility from the consumption that they ultimately desire, not returns.

Even if the model is not used to project directly the expected risk premium, it can, at a minimum, be used to verify that the risk premia data chosen for estimating the cost of capital is empirically validated by fitting the model well. The model can be used to predict the equity risk premia net of the risk-free rate (equity risk premium) or to predict the equity-to-debt risk premium for a firm. We perform both of these empirical tests in this paper. The general consumption-based asset pricing model developed in Michelfelder and Pilotte (2011) and based on Cochrane (2004) provides the relationship of the ex ante risk premium to an asset's own volatility in return:

$$E_{t}[R_{i,t+1}] - R_{f,t} = -\frac{vol_{t}[M_{t+1}]}{E_{t}[M_{t+1}]}vol_{t}[R_{i,t+1}]corr_{t}[M_{t+1}, R_{i,t+1}].$$
 (1)

¹ GARCH refers to the generalized autoregressive conditional heteroskedasticity regression model which is discussed below.

where vol_t is the conditional volatility, $corr_t$ is the conditional correlation, and M_{t+1} is the stochastic discount factor (SDF).

The SDF is the intertemporal marginal rate of substitution in consumption, or, $M_{t+1} = \beta \frac{U_{c,t+1}}{U_{c,t}}$, where the U_c 's are the marginal utilities of consumption in the next period, t + 1, and the current period, t, and β is the discount factor for period t to t + 1. Equation 1 shows that the algebraic sign of the relation between the expected risk premium and the conditional volatility of an asset's risk premium is determined by the correlation between the asset's return and the SDF. That is, the direction of the relation between the asset return and the ratio of intertemporal marginal utilities in consumption inversely determines the relation between the expected risk premium and conditional volatility. When the correlation is equal to negative one, the asset's conditional expected risk premium is perfectly positively correlated with its conditional volatility. A positive relation between the conditionally expected risk premium and volatility obtains when $-1 < corr_t < 0$. A negative relation obtains when $0 < corr_t < 1$. For an asset that represents a perfect hedge against shocks to the marginal utility of consumption, with $corr_t = 1$, there will be a perfect negative correlation between the conditionally expected risk premium and its volatility.² Therefore, estimates of the relation between the first two conditional moments of a public utility stock's returns provide a direct test of the effectiveness of a public utility stock, or any asset, as a consumption hedging asset. In Eq. 1, $vol_t[M_{t+1}]/E_t[M_{t+1}]$ is the slope of the meanvariance frontier. If this slope changes over time, the estimated relation between the stock's risk and return will vary over time. This model can also be viewed simplistically as the projected expected risk premium as a function of its own projected risk, given information available at time t.

Note that the model allows for the expected risk premium to be negative if the asset hedges shocks to the marginal utility of consumption. Investors are willing to accept an expected rate of return lower than the risk-free rate of return if the pattern of volatility is such that returns are expected to rise with expected reductions in consumption. Simply, investors are willing to *pay* a premium for a higher level of returns volatility that has the desired pattern of returns. These desired returns patterns have a tendency to offset drops in consumption. Therefore, this model shows that investors may not be averse to volatility, but rather to the timing of expected changes in returns.

Summarizing, several conclusions can be drawn from the general model of asset pricing. First, the sign of the relation between a stock's risk premium and conditional volatility depends on the extent to which the stock serves as an intertemporal hedge against shocks to the marginal utility of consumption. Second, the relation between stock risk and return may be time-varying depending on changes in the slope of the mean-variance frontier. Third, hedging assets have desired patterns of volatility that result in expected rates of return that are less than the risk-free rate. We do not expect

 $^{^2}$ A hedging asset is one that has a positive increase in returns that is coincident with a positive shock in the ratio of intertemporal marginal utilities of consumption. Note that if we assume a concave utility function in consumption, as consumption declines, the marginal utility of consumption rises relative to last period marginal utility. If we think of a decline in consumption as a contraction in the business cycle, the hedging asset delivers positive changes in returns when the business cycle is moving into a contraction, and therefore the asset is a business cycle hedge.

that public utility stocks serve as a hedging asset as they are not viewed as defensive stocks (they do not rise in value during downturns in the stock market) due to asymmetric regulation and returns as discussed in detail in Kolbe and Tye (1990). Under asymmetric regulation, utility regulators have a tendency to allow the return on equity to fall below the allowed return during downturns in the business cycle and to reduce the return should it rise above the allowed return during expansions. Therefore we expect that the parameter estimates of the return-risk relationship to be positive as utility stocks are hypothesized to not be hedges.

We use the GARCH model to estimate the general asset pricing model since the GARCH model accommodates ARCH effects that improve the efficiency of the parameter estimates. It also provides a volatility forecasting model for the conditional volatility of the asset's risk premium. The conditional volatility projection is used, in turn to predict the expected risk premium. We also use the GARCH-in-Mean model (GARCH-M) since it specifies that the conditional expected risk premium is a linear function of its conditional volatility. There is a vast body of literature that estimates asset pricing models with the GARCH and GARCH-M methods and therefore we will not attempt to summarize them here.

The GARCH-M model was initially developed and tested by Engle et al. (1987) to estimate the relationship between US Treasury and corporate bond risk premia and their expected volatilities. The GARCH-M model is specified as:

$$R_{t+1} - R_{f,t+1} = \alpha \sigma_{t+1}^2 + \varepsilon_{t+1}$$
(2)

$$\sigma_{t+1}^2 = \beta_0 + \beta_1 \sigma_t^2 + \beta_2 \varepsilon_t^2 + \eta_{t+1}$$
(3)

$$\varepsilon_t | \psi_{t-1} \sim T(0, \sigma_t^2) \tag{4}$$

where R_{t+1} is the expected total return on the public utility stock index or individual utility stock; $R_{f,t+1}$ is the risk-free rate of return or the yield on an index of public utility bonds of a specified bond rating for the equity-to-debt premium; σ_{t+1}^2 is the conditional or predicted variance of the risk premium that is conditioned on past information (ψ_{t-1}); and ε_t is the error term that is conditional on ψ_{t-1} .

The conditional distribution of the error term is specified as the non-unitary variance T-distribution due to the thick-tailed distribution of the risk premia data. If the error distribution is thick-tailed, using an approximating distribution that accommodates thick tails improves the efficiency of the estimates. The parameter, α , is the return-to-risk coefficient as specified in Eq. 1 as:

$$\alpha = -\frac{vol_t[M_{t+1}]}{E_t[M_{t+1}]}corr_t[M_{t+1}, R_{i,t+1}]$$
(5)

Note that the coefficient will be positive if the conditional correlation between the SDF and the asset return is negative, indicating that the stock is not a hedging asset. Recall that the SDF is the ratio of intertemporal marginal utilities. Assuming a concave utility function, an upward shock in the ratio implies falling consumption, therefore an associated rise (positive correlation) in the return (R_i) would offset the reduction

in consumption, thereby causing the sign of α to be negative. The parameter, α , is also the ratio of risk premium to variance, or, the Sharpe ratio.

The intercept in Eq. 2 is restricted to zero as specified by the general asset pricing model specification. The restriction on the intercept equal to zero has been found to be robust in producing consistently positive and significant relationships between equity risk premia and risk in GARCH-M models. This is discussed in Lanne and Saikkonen (2006) and Lanne and Luoto (2007). We have found the same results in our modeling in this paper, although we have excluded these results for brevity (available upon request). Therefore we specify the prior assumption that the intercept or the "excess" return, i.e., the return not associated with risk to be equal to zero and drop the intercept from the model.

The consumption asset pricing model is estimated in the empirical section of the paper and applied in the applications section of the paper. The model is tested to (1) determine if equity-to-debt risk premium indices for utilities of differing risk specified by differing bond ratings are validated by the asset pricing model and therefore have some empirical support for risk premium prediction and application to utility cost of capital estimation, (2) determine whether equity risk premia can be predicted and fit the model and therefore be used to estimate the cost of common equity, (3) empirically test the consumption asset pricing model, and (4) ascertain whether utility stocks are assets that hedge shocks to the marginal utility of consumption.

If utility stocks are hedging assets then the cost of common equity should reflect a downward adjustment to a specified risk-free rate to reflect investors' preferences for a hedge and the compensation that they are willing to pay for it.

3 Data and empirical results

We use portfolios as represented by public utility stock and bond indices to estimate the conditional return-risk relationship for the equity-to-debt premium. The equityto-debt risk premium data employed for estimating Eq. 1 with the GARCH-M conditional return-risk regressions are monthly total returns on the Standard and Poor's Public Utilities Stock Index (utility portfolio), and the monthly Moody's Public Utility Aa, A, and Baa yields for the debt cost. We also obtained equity risk premia for the utility portfolio using the Fama-French specified risk-free rate of return, which is the holding period return on a 1-month US Treasury Bill. The data range from January 1928 to December 2007 with 960 observations. The return-risk relationships for the equity-to-debt premia are risk-differentiated by their own bond rating.

As a check, we also estimate Eq. 1 with the GARCH-M for large common stock returns using the monthly Ibbotson Large Company Common Stocks Portfolio total returns and the Ibbotson US Long-Term Government income returns as the risk-free rate. Additionally, as another check, we do the same for the University of Chicago's Center for Research in Security Prices value-weighted stock index (CRSP) using the Fama-French risk-free rate. This is the Fama-French specification of the market equity risk premium. The data range from January 1926 to December 2007 with 984 observations for the Large Company Common Stock estimation and the data ranges

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Utility bond rating	Mean	Std. Dev.	Skewness	Kurtosis	JB
Aa	0.0037	0.0568	0.0744	10.07	2,001.2***
A	0.0035	0.0568	0.0632	10.06	1,991.8***
Baa	0.0031	0.0568	0.0375	10.02	1,973.6***
Ibbotson					
Large common stocks	0.0054	0.0554	0.4300	12.84	3,954.7***
CRSP value-weighted stock index	0.0062	0.0544	0.2309	10.92	2,519.1***

 Table 1 Descriptive statistics: public utility and large company common stocks equity-to-debt and equity risk premia

The public utility equity-to-debt risk premia monthly time series is from January 1928 to December 2007 with 960 observations. The equity risk premium monthly time series for the Large Common Stocks and the CRSP index are January 1926 to December 2007 with 984 observations, and January 1926 to December 2007 with 984 observations, and January 1926 to December 2007 with 984 observations, respectively. The public utility stocks equity-to-debt risk premia are calculated as the total return on the S&P Public Utilities Index of stocks minus the Moody's Public Utility Aa, A, and Baa Indices yields to maturity. The Large Company Common Stocks Portfolio minus the Ibbotson Long-Term US Government Bonds Portfolio income yield. The CRSP equity risk premia, or the Fama-French market risk premia are the CRSP total returns on the value-weighted equity index minus the 1-month holding period return on a 1 month Treasury Bill. The Jarque-Bera (JB) statistic is a goodness-of-fit measure of the departure of the distribution of a data series from normality, based on the levels of skewness and excess kurtosis. The JB statistic is χ^2 distributed with 2° of freedom. *** Significant at 0.01 level, one-tailed test

from January 1928 to January 2007 with 960 observations (same as the utilities) for the CRSP estimation.

Table 1 displays the descriptive statistics for these data. We have estimated the mean, standard deviation, skewness and kurtosis parameters, as well as the Jarque-Bera (JB) statistic to test the distribution of the data. The means of the utility equity-to-debt risk premia fall as the risk (bond rating) declines. This is consistent with the notion that larger yields are subtracted from stock returns the lower the bond rating. Intertemporally, there is an inverse relationship between risk premia and interest rates (See Brigham et al. (1985) and Harris et al. (2003)). The mean for risk premia will have a tendency to be larger during low interest rate periods.

Not surprisingly, large company common stocks have the highest mean risk premia as the majority of these firms are not rate-of-return regulated firms with a ceiling on their ROE's close to their cost of capital. Interestingly, the standard deviations of the utility stock returns are similar and slightly higher than large company common stocks. Skewness coefficients are small and positive except for Ibbotson large company common stock returns and CRSP returns that have large positive skewness. This suggests that large unregulated stocks have a tendency to have more and larger positive shocks in returns than do utilities that are rate of return regulated. The kurtosis values show that all of the risk premia are thick-tail distributed. This is also found in the significant JB statistics that test the null hypothesis that the data are normally distributed. The null hypothesis is rejected for all assets. The high kurtosis, low skewness, and significant JB statistics show that the risk premia data are substantially thick-tailed, except for non-utility stocks that are both skewed and thick-tailed. Therefore, robust estimation methods are required to produce efficient regression estimates with non-normal data. Additionally, although not shown but available upon request, the serial correlation and

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ARCH Lagrange Multiplier tests show that residuals from OLS regressions of risk premia on volatilities follow an ARCH process. Therefore, the GARCH-M method will improve the efficiency of the estimates. We specify the regression error distribution as a non-unitary variance T-distribution so that thick-tails could be accommodated in the estimation and therefore produce increasingly efficient parameter estimates.

We used maximum likelihood estimation with the likelihood function specified with the non-unitary-variance T-distribution as the approximating distribution of the residuals to accommodate the thick-tailed nature of the error distribution. The equations are estimated as a system using the Marquardt iterative optimization algorithm. The chosen software for estimating the model was EViews[©] version 6.0 (2007).

Table 2 shows the GARCH-M estimations for the consumption asset pricing Eq. 1. We have estimated Eq. 1 for the utility equity risk premia using the Fama-French risk-free rate in addition to the equity-to-debt risk premia risk-differentiated by bond ratings and the two measures of the market equity risk premium. The chosen measure of volatility is the variance of risk premium (in contrast to other such measures such as the standard deviation or the log of variance. Although these results are not shown for brevity, they are robust to these other measures of volatility). The slope, which is the predicted return-to-predicted risk coefficient and Sharpe ratio, is positive and significant at the 99% level for all assets except the utility stock returns with Baa bonds, which is significant at the 95% level. Given that all slopes are positive, public utility stocks are not found to hedge shocks to the marginal utility of consumption. Note that the reward-to-risk slope rises as bond rating rises. This suggests that lower risk utility stocks provide a higher incremental risk-premium for an increase in conditional volatility. This is consistent with other studies that find that lower risk assets, such as shorter maturity bonds, have higher Sharpe Ratios than longterm bonds and stocks. See Pilotte and Sterbenz (2006) and Michelfelder and Pilotte (2011).

The variance equation shows that all GARCH coefficients (β 's) are significant at the 1% level and the sums of β_1 and β_2 are close to, but less than 1.0, indicating that the residuals of the risk premium equation follow a GARCH process and that the persistence of a volatility shock on returns and stock prices for utility stocks is temporary. The estimates of the non-unitary variance T-distribution degrees of freedom parameter are low and statistically significant, indicating that the residuals are well approximated by the T. Similar values for the log-likelihood functions (Log-L) show that each of the regressions has a similar goodness-of-fit. Chi-squared distributed likelihood ratio tests (not shown but available upon request) that compare the goodness of fit among the T and normal specifications of the likelihood function of the GARCH-M regressions show that the T has a significantly better fit than the normal distribution.

The GARCH-M results for the large company common stocks portfolio are similar to those of the utility stocks. Not surprisingly, large company common stocks do not hedge shocks to the marginal utility of consumption and volatility shocks temporarily affect their valuations. The exception is that the return-risk slope is substantially higher than utility stock slopes. This is partially due to the risk-free nature of the risk-free rates used with the non-utility equity risk premia compared to the

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Utility bond rating	α	β_0	β_1	β2	Log-L	T dist. D.F.
Aa	1.5183*** (0.5308)	0.0000** (0.0000)	0.8791*** (0.0230)	0.1031*** (0.0219)	1,604.4	9.9254*** (3.0272)
A	1.4536*** (0.5308)	0.0000** (0.0000)	0.8790*** (0.0230)	0.1033*** (0.0220)	1,605.0	9.9381*** (3.0408)
Baa	1.3318** (0.5303)	0.0000** (0.0000)	0.8789*** (0.0229)	0.1040*** (0.0220)	1,605.2	10.0*** (3.0540)
Fama-French R_f	2.1428*** (0.5318)	0.0000** (0.0000)	0.8811*** (0.0232)	0.0979*** (0.0212)	1,601.0	9.8773*** (2.9700)
Ibbotson						
Large company common	2.7753*** (0.5513)	0.0001*** (0.0000)	0.8381*** (0.0269)	0.1186*** (0.0332)	1,620.8	8.8457*** (2.1613)
CRSP value-weighted stock index	3.3873*** (0.5673)	0.0001*** (0.0000)	0.8330*** (0.0270)	0.1149*** (0.0358)	1,598.9	8.8571*** (1.9505)

 Table 2
 Estimation of return-risk relation: public utility and large company common stocks

The results below are the GARCH-in-Mean regressions for the risk premium $(R_{t+1} - R_{f,t+1})$ on the conditional variance of the risk premium (σ_{t+1}^2) in the mean equation. The intercept in the mean equation is restricted to be equal to zero. The public utility equity-to-debt risk premia monthly time series is from January 1928 to December 2007 with 960 observations. The equity risk premium monthly time series for the Large Company Common Stocks and the CRSP index are January 1926 to December 2007 with 984 observations, and January 1926 to December 2007 with 984 observations, respectively. The public utility stocks equity-to-debt risk premia are calculated as the total return on the S&P Public Utilities Index of stocks minus the Moody's Public Utility Aa, A, and Baa Indices yields to maturity. The Large Company Common Stocks Portfolio minus the Ibbotson Long-Term US Government Bonds Portfolio income yield. The CRSP equity risk premia, or the Fama-French market risk premia are the CRSP total returns on the value-weighted equity index minus the 1-month holding period return on a 1 month Treasury Bill. The estimated model is:

the 1-month holding period return on a 1 month Treasury Bill. The estimated model is: $R_{t+1} - R_{f,t+1} = \alpha \sigma_{t+1}^2 + \varepsilon_{t+1}$ where $\alpha = -\frac{vol_t[M_{t+1}]}{E_t[M_{t+1}]} corr_t[M_{t+1}, R_{i,t+1}]$

 $\sigma_{t+1}^2 = \beta_0 + \beta_1 \sigma_t^2 + \beta_2 \varepsilon_t^2 + \eta_{t+1}$

The conditional distribution of the error term is the non-unitary variance T-distribution to accommodate the kurtosis of the risk premia and error term. Standard errors are in parentheses. ***, **, * denote significance at the 0.01, 0.05, and 0.10 levels, respectively for two-tail tests

utility bond yields that reflect risk. The utility stocks slope value of 2.1428 using the Fama-French risk-free rate is closer to the higher CRSP value of 3.3873 that is also based on the Fama-French risk-free rate. This is inconsistent with previous results herein and in other papers that find that Sharpe Ratios are lower for higher risk assets unless this finding can be interpreted as utility stocks having more risk than non-regulated stocks. The standard deviations on Table 1 suggest that utility stock return volatilities are as high as the stock returns of non-regulated firms. However, similar model estimates of portfolios of common stocks yield unstable results, such as negative as well as positive return-risk slopes when the intercept is not restricted to zero. See Campbell (1987), Glosten et al. (1993), Harvey (2001), and Whitelaw (1994). New approach to estimating the cost of common equity capital

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Stock market results are highly sensitive to empirical model specification. Many studies do not consider the impact of a zero-intercept prior restriction on the stability of their results. This simple innovation has led to more consistent results in modeling stock market risk-return relationships, and therefore we have included it in this paper.

The estimation of the consumption asset pricing model for utility stock equitydebt risk premia shows that the use of bond-rating risk-differentiated risk premia are validated as their risk-return relationships are well-fitted by theoretical and empirical models of risk and return. Therefore, these data impound good representations of the risk and reward relationship.

One concern is the intertemporal stability of the alphas. Figure 1 plots the utility stock portfolio alpha (using the Fama-French R_f to calculate the premium) and its standard error for 240 month rolling regressions of the model estimated with GARCH-M in the same manner as described above to review the intertemporal stability of the alpha. A 20-year period was used for each estimation to trade off timeliness with sufficient observation of up and down stock market regimes and business cycles. This resulted in 720 estimated alphas from 1947 to 2007. The results show that the utility alpha is stable to the extent that the algebraic sign is always positive and generally significant, therefore the nature of utility stocks are assets that are not and have never been hedges during the second half of the twentieth century up to the present. The value of the alpha does change substantially. The mean of the alpha is 4.40 with a range from -0.11 (insignificantly different from 0) to 11.66. As a comparison, the alpha for the CRSP value-weighted stock index was also estimated with rolling regressions in the same manner and for the same time period. Figure 2 is a plot of the CRSP alpha and standard error. Note that the general stock market alpha is similar to that of utility stocks. They are all positive and almost all statistically significant and follow a strikingly similar cycle. Figure 3 plots both the utility and stock market alphas and demonstrates the similarity. The correlation coefficient between the utility and stock market alphas is 0.88. Recalling that the alpha is a Sharpe Ratio, we see that return to risk ratio does change substantially. This is consistent with the results in Pilotte and Sterbenz (2006).

One other interesting observation is that the standard errors of the alphas are highly stable over the study period and are very similar in magnitude regardless of the size of the corresponding alpha. Whereas the alpha follows a cyclical pattern, the volatility in alpha is highly stationary around a constant, long-run mean.

The GARCH-M model estimations of the consumption asset pricing model were specified with variance as the measure of volatility. We also performed the same model estimations with alternative specifications of volatility such as the standard deviation and the log of variance and the results were not sensitive to this specification.

4 Application

We apply the model in this section to compare the cost of common equity capital estimates with the DCF and CAPM models. Using EViews[©] Version 6.0, we estimated the model coefficients (α , $\beta's$) over rolling 24 month periods ending December 2008.
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Fig. 1 Rolling 240 month utility stock alphas 1947–2007



Fig. 2 Rolling 240 month CRSP value-weighted alphas 1947–2007

We repeated the estimation over 5, 10, 15, 20 and 79 year periods.³ Predicted monthly variances (σ_{l+1}^2) were generated from these estimations to produce predicted risk premiums that were calculated by multiplying the predicted variance by the " α " slope

 $^{^{3}}$ We did not include the results of the 10 and 15 year estimations to abbreviate the amount of empirical results presented since they added no material insights beyond those already presented.



Fig. 3 Rolling 240 month CRSP and utility alphas 1947–2007

Table 3 Estimates of e	expected risk premia
--------------------------------	----------------------

	Mean (%))	Range (%)		Standard	deviation (%)
	Average	Spot	Average	Spot	Average	Spot
Ibbotson Associates d	ata					
79-years	9.59	5.76	8.74-9.96	2.62-22.60	0.32	5.24
20-years	6.77	6.94	4.99-8.50	2.24-28.95	0.95	6.88
5-years	4.20	10.25	-98.49-11.62	-100.00-39.65	22.00	26.61
S&P Utility Index						
79-years	5.28	2.90	4.30-5.28	1.65-8.15	0.32	1.60
20-years	3.93	3.51	2.78-5.03	2.18-6.88	0.57	1.11
5-years	31.82	326.63	7.77–156.97	6.12-6465.74	31.47	1283.51

coefficient. To test the stability of the predicted risk premia over time, the predicted risk premia were calculated using either the predicted variance over each entire time period or the last monthly (spot) predicted variance. Table 3 presents the mean predicted risk premia, the range of predicted premia and the standard deviations for each time period. It is clear from the results that the risk premia are more stable over the rolling 24 month period when calculated using the average predicted variance compared with using the spot variance. Secondly, the 20 and 79 year means are substantially more stable and reasonable in magnitude than the 5 year means.

Next, given the lessons from the analyses above, we apply the model to mechanically⁴ estimate the cost of common equity for 8 utility companies using the model and

⁴ The term "mechanically" in this context means that the resulting values have been developed in a consistent manner with the same inputs across all utility stocks but no subjective judgment was used to develop final values for each specific utility stock application.

the DCF and CAPM as comparisons. We also calculated the realized market return for comparison. Two publicly-traded electric, electric and gas combination, gas, and water utilities respectively were chosen for the application. The Gordon (1974) DCF and CAPM models are used in many utility regulatory jurisdictions in the US.

The DCF was applied using a dividend yield, D_0/P_0 , derived by dividing the yearend indicated dividend per share (D_0) by the year-end spot market price (P_0) . The dividend yield is grown by the year-end I/B/E/S five year projected earnings per share growth rate (g) to derive $D_0(1+g)/P_0$. The one-year predicted dividend yield is then added to the I/B/E/S five-year projected EPS growth rate to obtain the DCF estimate of the cost of common equity capital, k. This study was conducted for the 5 years ending 2008.

The CAPM was applied by multiplying the Value Line beta (β) available at yearend for each company by the long-term historic arithmetic mean market risk premium $(R_m - R_f)$. $R_m - R_f$ is derived as the spread of the total return of large company common stocks over the income return on long-term government bonds from the Ibbotson SBBI 2009 Valuation Yearbook. The resulting company-specific market equity risk premium is then added to a projected consensus estimate of the yield on 30-year U.S. Treasury rate provided by Blue Chip Financial Forecasts as the risk-free rate (R_f) to obtain the CAPM result. This study was also conducted over the 5 years ending 2008.

Figures 4–11 show the histograms of the cost of common equity capital estimations for each of the eight public utility stocks and the realized market returns in the forthcoming year. The consumption asset pricing model appears to track more consistently with the CAPM than with the DCF which seems to produce generally lower values than the other methods. The consumption asset pricing model results are similar to the CAPM. The model and the CAPM compete as the best predictor of the rate of return on the book value of common equity (not shown but available upon request), but none of the expected returns were good predictors of market returns. That does not infer that they were not good predictors of *expected* market returns. These results are an initial indicator that the consumption asset pricing model provides reasonable and stable results. This paper does not suggest at this early juncture that the consumption asset pricing model is superior to the CAPM or DCF, although it is based on far less restrictive assumptions than these other models. For example, both the DCF and CAPM assume that markets are efficient. Many assume that the DCF requires that the market-to-book ratio to always equal one, whereas the long-term value for the Standard and Poor's 500 is equal to 2.34. The CAPM assumes that investors demand higher returns for higher volatility and that the minimum required return is the risk-free rate, whereas the consumption asset pricing model allows for investors to require returns less than the risk-free rate for stocks that may have relatively higher volatility but are hedging assets that have desirable return fluctuation patterns that offset downturns in the business cycle. Unlike the CAPM, the model prices the risk to which investors are actually exposed, whether it's systematic risk or not. Some investors are diversified and some are not; the model prices whatever risk to which the aggregate of investors of the specific stock is exposed.

We find that the consumption asset pricing model should be used in combination with other cost of common equity pricing models as additional information in the devel-

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Cost of Common Equity Results for Edison International Compared to Market Return* M PRPM M CAPM = DCF Actual

* Market returns calculated for the following years: 2005 -2009

Cost of Common Equity Results for Southern Company Compared to Market Return*

9.84% 9.76% 9.55% 9.64% 0.809 9.42% 9.08% 8.88% 9.18% 9.37% 8.57% -0.03% 2004 2005 2006 2007 2008 -7.60% -9.83% -11.63%

🏼 PRPM 🕮 CAPM 🚿 DCF 🗮 Actual

* Market returnscalculated for the following years: 2005 -2009









I PRPM I CAPM DCF Actual



Figs. 4-11 Comparison of the cost of common equity estimates and market

opment of a cost of common equity capital recommendation. Practitioners may find the modeling methods and the use of relatively advanced econometric methods rather cumbersome. The software for performing these estimations is readily available from EViews[©] and SAS[©]; two commonly available software packages at utilities, consult-

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-7.30%



-11.94% * Market returnscalculated for following years: 2005 -2009 Missing DCF Cost of Capital Estimate Due to Unavailable Growth Rate

Figs. 4-11 continued

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ing firms and financial firms. Recent Ph.D. and M.S. holding members of research departments of investment and consulting firms have ready access to the model and methods discussed in this paper, although it will require years for these tools, like any "new" technology, to diffuse into standard use. Another problem is that the model requires a substantial time series history on stock returns data to develop stable estimates of risk premia This is problematic especially for the electric and gas utility industries that have consolidated with many mergers in the recent past. This problem can be addressed by developing and predicting the value-weighted risk premium of a portfolio of similar stocks such as electric utilities that have nuclear generating assets. The specific stock in question would be included in the returns index with a weight based on market capitalization that would go to 0 when the stock price history is no longer existent reaching back into the past.

5 Conclusion

The purpose of this paper is to introduce, test empirically and apply a general consumption based asset pricing model that is based on a minimum of assumptions and restrictions that can be used to predict the risk premium to be applied in estimating the cost of common equity for public utilities in regulatory proceedings. The results support the simple consumption-based asset pricing model that predicts the ex ante risk premium with a conditionally predicted volatility in risk premium. The estimates of the cost of common equity from the consumption asset pricing model compare well with rates of return on the book value of common equity and with the CAPM, although both the model and the CAPM results are substantially higher than the DCF. This is quite common in the practice of the cost of common equity in the utility industry. The results of the model are stable and consistent over time. Therefore the model should be considered as it provides additional evidence on the cost of common equity in general and specifically in public utility regulatory proceedings. Secondly, the use of bondrated yields to predict risk differentiated equity-to-debt risk premia is supported by the empirical evidence and therefore should be applied in estimating the cost of common equity. Finally, the robust empirical evidence on the positive risk-return relationship also shows that utility stocks are not a consumption hedge and are not good hedging securities against contractions in the economy. The model and estimation methodology presented in this paper provide a relatively simple tool to determine whether any asset is a hedge to adverse changes in the business cycle through the level of consumption in the economy.

Acknowledgments We would like to thank Dylan D'Ascendis, Sal Giunta, Selby Jones, III and Alison McVicker for highly capable research assistance, participants at the Center for Research in Regulated Industries Eastern Conferences and the Society of Utility Regulatory and Financial Analysts Annual Financial Forum, two anonymous reviewers and the editor for helpful comments.

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Exhibit No.___ Schedule PMA-6 Rebuttal Page 1 of 15

Comparative Evaluation of the Predictive Risk Premium Model[™], the Discounted Cash Flow Model and the Capital Asset Pricing Model for Estimating the Cost of Common Equity

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The authors wish to thank Selby P. Jones, III, Associate, AUS Consultants, for his technical assistance.

Abtract

The regulatory process for setting a utility's allowed rate of return on common equity has generally relied upon the Discounted Cash Flow Model and Capital Asset Pricing Model. Despite the widely known problems with these models, there has been little initiative to adopt more recently developed asset pricing models which have fewer limiting assumptions and require less subjective judgment. The December 2011 issue of the Journal of Regulatory Economics published the article "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities",ⁱ and introduced the Predictive Risk Premium ModelTM. The model is a general, yet simple, consumption-based asset pricing model of the risk / return relationship for common stocks which can be used to estimate the cost of common equity. The model produces stable, consistent and expectational results. This article presents in summary form exhaustive empirical testing of the PRPM[™] for utilities by industry. The empirical testing confirms the Journal of Regulatory Economics article conclusion: the PRPMTM produces stable, consistent, and reasonable results for each of the electric, electric and gas, gas local distribution, and water utility industries.

Introduction

The lead article in the July 2008 issue of this *Journal*, "Integrating Renewables into the US Grid: Is it Sustainable," by Professors Peter Mark Jansson and Richard A. Michelfelderⁱⁱ, called for the reregulation of the electric utility industry and putting the planning of generation assets, whether renewable or not, back in the hands of the experts and those ultimately responsible for reliability, the electric utilities. During the last ten years or so, states have been backpedalling on deregulation and therefore methods for estimating the cost of common equity and the allowed rate of return have generated new interest as regulating rate of return is not going away as once thought.

The regulatory process for setting a public utility's allowed rate of return on common equity has generally relied upon the familiar Gordon Discounted Cash Flow Model (DCF) and Capital Asset Pricing Model (CAPM). Despite the widely known problems with these models, there has been little initiative to adopt more recently developed asset pricing models which have fewer limiting assumptions and require less subjective judgment than these traditional models. In December 2011, the article "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities",ⁱⁱⁱ published in *The Journal of Regulatory Economics* introduced the Predictive Risk Premium ModelTM (PRPMTM). The PRPMTM is a general, yet simple, consumption-based asset pricing model of the risk / return relationship for common stocks which can be used to estimate the cost rate of common equity (ROE). The stability and consistency of the results of PRPMTM

and the ex ante, i.e., expectational, nature of those results indicate that the model should be used to provide additional input into the process of determining an allowed rate of return on common equity for public utilities.

Since publication, more exhaustive empirical testing of the PRPM[™] was conducted for the four utility industry groups which comprise the AUS Utility Reports^{©iv} universe of publicly traded utilities: an electric utility group; a combination electric and natural gas distribution utility group; a natural gas distribution utility group; and, a water utility group. The empirical testing confirms the conclusion of the original *Journal of Regulatory Economics* article: the PRPM[™] produces stable results which are consistent over time.

Development of the PRPM[™]

The cost rate of common equity is not directly observable in the capital markets and must be inferred using various financial models. The most commonly used cost of common equity models in the regulatory arena are the aforementioned DCF and the CAPM. Since these models are based upon many restrictive assumptions, they involve a significant amount of analyst subjectivity in their application, resulting in much debate over the application and results of these models.

The empirical approach to the PRPM[™] is based upon the work of Robert F. Engle, Ph.D.^v who shared the Nobel Prize in Economics in 2003 "for methods of analyzing economic *time series* with time-varying volatility (*ARCH*)"^{vi}, with "ARCH" standing for autoregressive conditional heteroskedasticity. In other

words, volatility (variance) changes over time and is related to itself from one period to the next, especially in financial markets. Engle discovered that the volatility (usually measured by variance) in prices and returns clusters over time. Therefore, volatility is highly predictable and can be used to predict future levels of risk. The theoretical asset pricing model was recently developed in the *Journal of Economics and Business* in December 2011 by Rutgers University professors Richard Michelfelder and Eugene Pilotte^{vii}.

In this study, the PRPM[™] estimates the risk / return relationship directly using the outcomes of investors' historical pricing decisions and actual long-term U.S. Treasury security yields, with the predicted equity risk premium generated by the prediction of volatility, i.e., the risk, based upon the volatility of past equity risk premiums for the AUS Utility Reports universe of companies.

Estimation Method

The statistical details of the estimation method of the PRPM[™] can be found in the original article in the *Journal of Regulatory Economics*, "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities". Essentially, there are two steps to the application of the PRPM[™]. First, predicted volatility, i.e., risk, is derived based upon previous volatility plus previous prediction error, because volatility is highly predictable and correlated over time. Second, the predicted volatility can then be used to generate the predicted equity risk premium (ERP) by multiplying it by the GARCH coefficient,

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i.e., the slope of the predicted volatility. A risk-free rate is then added to the ERP to estimate the ROE, i.e., the market based cost of common equity.

Application of the PRPM[™] to Publicly Traded Utility Companies

The PRPMTM was applied to the companies comprising the AUS Utility Reports^{©,} utility industry groups: the electric, combination electric and natural gas distribution, natural gas distribution and water groups. The PRPMTM variances were calculated monthly for each individual utility beginning with the first available monthly data included for each individual utility in the University of Chicago Booth School of Business' Center for Research in Security Prices (CRSP[®]) and corresponding monthly long-term U.S. Treasury bond yields from Morningstar's *Ibbotson[®] SBBI[®] – 2012 Valuation Yearbook – Market Results for Stocks, Bonds, Bills and Inflation – 1926-2011 (SBBI)* through 72 month ending periods, i.e., January 2006 through December 2011.

Using EViews[©] Version 7.2, the PRPM[™] coefficients and predicted monthly variances were estimated as described in the *JRE* article for each time series of equity risk premiums. Consistent with the conclusion drawn in the *JRE* article, the predicted equity risk premiums were calculated using the averaged predicted volatilities (variances) over the entire time period for which CRSP data were available for each utility, multiplied by the GARCH, or slope, coefficient generated through EViews[®] for each time series. To calculate the PRPM[™] cost rate of common equity for each utility, the average predicted utility specific equity risk premium through each month ending from January 2006 through December 2011 was then added to the projected consensus forecast of the expected yields

on 30-year U.S. Treasury bonds for the next six quarters by the reporting economists in the concurrent *Blue Chip Financial Forecasts (Blue Chip)*.

The DCF was applied in a simple manner, using a dividend yield, D_0 / P_0 , derived by dividing the month-end indicated dividend per share (D_0) by the month-end closing market price (P_0) for each utility. The dividend yield was then grown by the month-end I/B/E/S consensus five-year projected earnings per share (EPS) growth rate (g) to derive (D_0 (1 + g) / P_0). The one-month predicted dividend yield was then added to the concurrent month's I/B/E/S consensus five-year average projected EPS growth rate to obtain the DCF estimate of the cost of common equity capital, k. The DCF estimates were also calculated for each month from January 2006 through December 2011.

The CAPM was applied by multiplying *Value Line Inc.'s* beta (β)^{viii}, for each utility, by the long-term historical arithmetic mean market equity risk premium ($R_m - R_f$) through the previous year. ($R_m - R_f$) was derived as the spread of the total return of large company common stocks over the income return on long-term government bonds from the annual <u>SBBI Valuation</u> <u>Yearbooks</u> for the years ending 2005 through 2010. The resulting utility-specific equity risk premium was then added to the same projected consensus forecast of the expected yields on 30-year U.S. Treasury bonds for the next six quarters by the reporting economists in the concurrent *Blue Chip* discussed above, to obtain the CAPM estimate of the cost of common equity capital, *k*. The CAPM estimates were also calculated for each month from January 2006 through December 2011.

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Finally, the results for each of the models, the PRPM[™], DCF, and CAPM, were averaged for each utility group^{ix}. Chart 1 presents the average PRPM[™] results for each of the AUS Utility Reports[©] utility groups for each month from January 2006 through December 2011.



Chart 1

Chart 1 shows that indicated ROEs derived from the PRPM[™] were stable for all utility groups until the global financial crisis of 2008 – 2009. During 2008 and 2009, the PRPM[™] derived ROEs decline, which in the authors' opinion, was a result of a "flight to quality" by investors, i.e., the willingness of an investor to accept a lower, but more certain, return during financial downturns. Chart 1 also indicates that the PRPM[™] derived ROEs for the electric, combination electric and natural gas distribution and natural gas distribution utility groups follow a nearly identical pattern throughout the 72-month period, with the water utility group following a similar, but more volatile pattern.

Charts 2 through 5 present a comparison of the average PRPM[™], DCF, and CAPM cost of common equity estimates for each AUS Utility Reports[©] utility industry group, i.e., the electric utility group; the combination electric and natural gas distribution utility group; the natural gas distribution utility group; and, the water utility group for each month from January 2006 through December 2011.



Chart 2





Chart 4







Charts 2 through 5 clearly show that, for the most part, the PRPMTM produces a higher average indicated ROE than both the DCF and CAPM. This is due to the fact that the PRPMTM prices <u>all</u> of the risk which investors actually face collectively. In contrast, the CAPM prices systematic risk (that investors face only if they have a perfectly diversified portfolio, which does not exist) and the DCF uses accounting, not market, based I/B/E/S consensus five-year projected EPS growth rates.

Conclusion

In the authors' opinion, the PRPM[™] benefits ratemaking with an additional model to estimate ROE. To that end, the Principals of AUS Consultants have been including the PRPM[™] in their rate of return testimonies and the model has been presented publicly in several venues.[×]

Its results are stable and consistent over time. It is not based upon restrictive assumptions, as are the DCF and CAPM. The PRPM[™] is also not based upon an estimate of investor behavior, but rather, upon a statistical analysis of actual investor behavior by evaluating the results of that behavior, i.e., the volatility (variance) of historical equity risk premiums. In contrast, subjective decisions surround the choice of the inputs to both the DCF and CAPM, from the choice of the time period over which to measure the dividend yield for the DCF, the choice of the DCF growth rate (e.g., historical or projected, earnings per share or dividends per share, and the like), to the selection of the appropriate beta (e.g., adjusted or unadjusted), market equity risk premium (e.g., historical or projected) and the appropriate risk-free rate (e.g., historical or projected and/or long v. short term) for the CAPM. In addition, as previously discussed, the CAPM exclusively prices systematic risk. In contrast, the PRPMTM prices all of the risk actually faced collectively by investors, because the model does not assume that investors' portfolios are perfectly diversified containing no unsystematic risk.

In addition, the inputs to the PRPM[™] are widely available. The GARCH coefficient is calculated with the relatively inexpensive EViews[©], or other statistical, software, based upon the realized ERP, i.e., total returns minus the

risk-free rate. The only subjective decisions to be made when applying the

PRPM[™] relate to which risk-free rate to use, e.g., long-term or short-term, and

over what time period to estimate the $PRPM^{TM}$ derived ROEs.

For all of these reasons, the authors conclude that the PRPM[™] should be

considered as appropriate additional evidence to measure the cost of common equity in regulatory rate setting for public utilities.

Ahern, Pauline M., Hanley, Frank J. and Michelfelder, Richard A., "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities," *Journal of Regulatory Economics* (2011) 40:261-278.

Jansson, Peter Mark, Michelfelder, Richard A., "Integrating Renewables into the US Grid: Is It Sustainable," The Electricity Journal (2008, July) 21: 9-21.

Ahern, Pauline M., Hanley, Frank J. and Michelfelder, Richard A., "New Approach to Estimating the Cost of Common Equity Capital for Public Utilities," *Journal of Regulatory Economics* (2011) 40:261-278.

^{iv} AUS Monthly Utility Reports is a monthly pocket reference book covering the electricity, combination electricity & natural gas distribution, natural gas distribution, and water companies which have publicly traded common stock. The monthly reports provide comprehensive information on key ratios and industry rankings based upon the financial statistics presented in the report.

Professor Emeritus, University of California, San Diego and currently the Michael Armellino Professor in Management of Financial Services at New York University, Stern School of Business.

www.nobelprize.org.

^{vii} Michelfelder, Richard, and Pilotte, Eugene, "Treasury Bond Risk and Return, the Implications for the Hedging of Consumption and Lessons for Asset Pricing," *Journal of Economics and Business* (2011) 63, 605-637.

^{viii} Using a proprietary data base available at mid-March, June, September, and December at the end of each year, from 2006 – 2011 from Value Line, Inc.

^{ix} The results shown in the accompanying charts represent AUS Utility group averages of only those utilities in each group for which it was possible to estimate all three models in any given month. For example, if ABC Utility did not have the I/B/E/S consensus growth rate necessary to calculate the DCF in a given month, that utility's PRPMTM and CAPM were not included in the group average for that month.

^x Edison Electric Institute Cost of Capital Working Group (Webinar 10/12); NARUC Staff Subcommittee on Accounting & Finance (9/12 & 3/10); National Association of Water Companies Finance/Accounting/Taxation and Rates & Regulations Committees (3/12); NARUC Water Committee (2/12); Wall St. Utility Group (12/11); IN Utility Regulatory Commission Cost of Capital Task Force (9/10); Financial Research Inst. of the Univ. of Missouri Hot Topic Hotline Webinar (12/10); and Center for Research in Regulated Industries Annual Eastern Conference (5/10 & 5/09).

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Approach for Estimating the Cost of Common Equity Capital for Public Utilities" co-authored by AUS Consultants' colleagues Pauline M. Ahern, Frank J. Hanley and Richard A. Michelfelder, published in the *Journal of Regulatory Economics*. Mr. D'Ascendis is a member of the Society of Utility and Regulatory Financial Analysts and the National Association of Water Companies. He holds an M.B.A. in both Finance and International Business from Rutgers University and a Bachelor of Arts Degree in Economic History from the University of Pennsylvania.

Frank J. Hanley is a Principal of AUS Consultants located in Mt. Laurel, NJ. He joined the firm in 1971 as Vice President, was elected Senior Vice President in 1975, and President of the Utility Services Group in 1989. Mr. Hanley has testified on cost of capital and related financial issues in more than three hundred cases before thirty-three state regulatory commissions, the District of Columbia Public Service Commission, the Public Services Commission of the U.S. Virgin Islands, the Federal Energy Regulatory Commission, a U.S. District Court, a U.S. Bankruptcy Court and the U.S. Tax Court. He has represented a number of electric, natural gas distribution and transmission companies, oil pipeline companies, as well as steam heating, telephone, water and wastewater companies. Mr. Hanley is a graduate of Drexel University and is a Certified Rate of Return Analyst (CRRA). He is a member of the Society of Utility and Regulatory Financial Analysts. He is an Associate Member of the American Gas Association as well as a member of its Rate Committee; and an Associate Member of the Energy Association of Pennsylvania. Also, he is a member of the Executive Advisory Council of the Rutgers University School of Business at Camden as well as a member of the Advisory Council of New Mexico State University's Center for Public Utilities.



Comparable Earnings: New Life for an Old Precept

by Frank J. Hanley Pauline M. Ahern

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Comparable Earnings: New Life for an Old Precept

ccelerating deregulation has greatly increased the investment risk of natural gas utilities. As a result, the authors believe it more appropriate than ever to employ the comparable earnings model. We believe our application of the model overcomes the greatest traditional objection to it — lack of comparability of the selected nonutility proxy firms. Our illustration focuses on a target gas pipeline company with a beta of 0.96 — almost equal to the market's beta of 1.00.

Introduction

The comparable earnings model used to determine a common equity cost rate is deeply rooted in the standard of "corresponding risk" enunciated in the landmark *Bluefield* and *Hope* decisions of the U.S. Supreme Court.¹ With such solid grounding in the foundations of rate of return regulation, comparable earnings should be accepted as a principal model, along with the currently popular marketbased models, provided that its most common criticism, non-comparability of the proxy companies, is overcome.

Our comparable earnings model overcomes the non-comparability issue of the non-utility firms selected as a proxy for the target utility, in this example, a gas pipeline company. We should note that in the absence of common stock prices for the target utility (as with a wholly-owned subsidiary), it is appropriate to use the average of a proxy group of similar risk gas pipeline companies whose common stocks are actively traded. As we will demonstrate, our selection process results in a group of domestic, non-utility firms that is comparable in total risk, the sum of business and financial risk, which reflects both non-diversifiable systematic, or market, risk as well as diversifiable unsystematic, or firm-specific, risk.



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Embedded in the Landmark Decisions

As stated in *Bluefield* in 1922: "A public utility is entitled to such rates as will permit it to earn a return ... on investments in other business undertakings which are attended by corresponding risks and uncertainties ..."

In addition, the court stated in *Hope* in 1944: "By that standard the return to the equity owner should be commensurate with returns on investments in other enterprises having corresponding risks."

Thus, the "corresponding risk" pre-

cept of *Bluefield* and *Hope* predates the use of such market-based cost-of-equity models as the Discounted Cash Flow (DCF) and Capital Asset Pricing (CAPM), which were developed later and are currently popular in ratebase/rate-of-return regulation. Consequently, the comparable earnings model has a longer regulatory and judicial history. However, it has far greater relevance now than ever before in its history because significant deregulation has substantially increased natural gas utilities' investment risk to a level similar to that of non-utility firms. As a result, it is

more important than ever to look to similar-risk non-utility firms for insight into common equity cost rate, especially in view of the deficiencies inherent in the currently popular market-based cost of common equity models, particularly the DCF model.

Despite the fact that the landmark decisions are still regarded as having set the standards for determining a fair rate of return, the comparable earnings model has experienced decreased usage by expert witnesses, as well as less regulatory acceptance over the years. We believe the decline in the popularity of the comparable earnings model, in large measure, is attributable to the difficulty of selecting non-utility proxy firms that regulators will accept as comparable to the target utility. Regulatory acceptance is difficult to gain when the selection process is arbitrary. Our application of the model is objective and consistent with fundamental financial tenets.

Principles of Comparable Earnings

Regulation is a substitute for the competition of the marketplace. Moreover, regulated public utilities compete in the capital markets with all firms, including unregulated non-utilities. The comparable earnings model is based upon the opportunity cost principle; i.e., that the true cost of an investment is the return that could have been earned on the next best available alternative investment of similar risk. Consequently, the comparable earnings model is consistent with regulatory and financial principles, as it is a surrogate for the competition of the marketplace, and investors seek the greatest available rate of return for bearing similar risk.

The selection of comparable firms is the most difficult step in applying the comparable earnings model, as noted by Phillips² as well as by Bonbright, Danielsen and Kamerschen ³ The selection of non-utility proxy firms should result in a sufficiently broad-based group in order to minimize the effect of company-specific aberrations. However, if the selection process is arbitrary, it likely would result in a proxy group that is too broad-based, such as the Standard & Poor's 500 Composite Index or the Value Line Industrial Composite. The use of such groups would require subjective adjustments to the comparable earnings results to reflect risk differences between the group(s) and the target utility, a gas pipeline company in this example.

Authors' Selection Criteria

We base the selection of comparable non-utility firms on market-based, objective, quantitative measures of risk resulting from market prices that subsume investors' assessments of all elements of risk. Thus, our approach is based upon the principle of risk and return: namely, that firms of comparable risk should be expected to earn comparable returns. It is also consistent with the "corresponding risk" standard established in Bluefield and Hope. We measure total investment risk as the sum of non-diversifiable systematic and diversifiable unsystematic risk. We use the unadjusted beta as a measure of systematic risk and the standard error of the estimate (residual standard error) as a measure of unsystematic risk. Both the unadjusted beta and the residual standard error are derived from a regression of the target utility's security returns relative to the market's returns, which takes the general form:

- $r_{it} = a_i + b_i r_{mt} + e_{it}$ where:
 - r_{ii} = *t*th observation of the *i*th utility's rate of return
 - $r_{mt} = t$ th observation of the market's rate of return
 - $e_{it} = t$ th random error term
 - a_i = constant least-squares regression coefficient
 - b_i = least-squares regression slope coefficient, the unadjusted beta.

As shown by Francis,⁴ the total variation or risk of a firm's return, Var (r_i) , comes from two sources:

Var (r_i) = total risk of *i*th asset

 $= \operatorname{var}(a_i + b_i r_m + e)$ substituting $(a_i + b_i r_m + e)$ for r_i $= \operatorname{var}(b_i r_m) + \operatorname{var}(e)$ since $\operatorname{var}(a_i) = 0$ $= b_i^2 \operatorname{var}(r_m) + \operatorname{var}(e)$ since $\operatorname{var}(b_i r_m) = b_i^2$ $\operatorname{var}(r_m)$ = systematic +unsystematic risk

Francis⁵ also notes: "The term $\sigma^2(r_i|r_m)$ is called the *residual variance* around the regression line in statistical terms or unsystematic risk in capital market theory language. $\sigma^2(r_i|r_m) = \dots$ = var (e). The residual variance is the squared standard error in regression language, a measure of unsystematic risk." Application of these criteria results in a group of non-utility firms whose average total investment risk is indeed comparable to that of the target gas pipeline.

As a measure of systematic risk, we use the Value Line unadjusted beta. Beta measures the extent to which marketwide or macro-economic events affect a firm's stock price. We use the unadjusted beta of the target utility as a starting point because it results from the regression of the target utility's security returns relative to the market's returns. Thus, the resulting standard deviation of beta relates to the unadjusted beta. We use the standard deviation of the unadjusted beta to determine the range around it as the selection criterion based on systematic risk.

We use the residual standard error of the regression as a measure of unsystematic risk. The residual standard error reflects the extent to which events specific to the firm's operations affect a firm's stock price. Thus, it is a measure of diversifiable, unsystematic, firmspecific risk.

An Illustration of Authors' Approach

Step One: We begin our approach by establishing the selection criteria as a range of both unadjusted beta and residual standard error of the target gas continued on page 6

pipeline company.

As shown in table 1, our target gas pipeline company has a Value Line unadjusted beta of 0.90, whose standard deviation is 0.1250. The selection criterion range of unadjusted beta is the unadjusted beta plus (+) and minus (-) three of its standard deviations. By using three standard deviations, 99.73 percent of the comparable unadjusted betas is captured.

Three standard deviations of the target utility's unadjusted beta equals 0.38 (0.1250 x 3 = 0.3750, rounded to 0.38). Consequently, the range of unadjusted betas to be used as a selection criteria is 0.52 - 1.28 (0.52 = 0.90 - 0.38) and (1.28 = 0.90 + 0.38).

Likewise, the selection criterion range of residual standard error equals the residual standard error plus (+) and minus (-) three of its standard deviations. The standard deviation of the residual standard error is defined as: $\sigma/\sqrt{2N}$.

As also shown in table 1, the target gas pipeline company has a residual standard error of 3.7867. According to the above formula, the standard deviation of the residual standard error would be $0.1664 (0.1664 = 3.7867/\sqrt{2(259)} =$ 37867/227596, where 259 = N, the number of weekly price change observations over a period of five years). Three standard deviations of the target utility's residual standard error would be 0.4992 (0.1664 x 3 = .4992). Consequently, the range of residual standard errors to be used as a selection criterion is 3.2875 - 4.2859 (3.2875 = 3.7867 -(4.2859 = 3.7867 +0.4992).

Step Two: The step one criteria are applied to Value Line's data base of nearly 4,000 firms for which Value Line derives unadjusted betas and residual standard errors on a weekly basis. All firms with unadjusted betas and residual standard errors within the criteria ranges are then selected.

Step Three: In the regulatory ratemaking environment, authorized common equity return rates are applied to a book-value rate base. Thus, the earnings rates on book common equity, or net worth, of competitive, non-utility firms are highly relevant provided those firms are indeed comparable in total risk to the target gas pipeline. The use of the return rates of other utilities has no relevance because their allowed, and hence subsequently achieved, earnings rates are dependent upon the regulatory

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Su for t Comparab	mmary of the he Proxy Gro le in Total Ri	c Company Sup of 24 sk to the	rable Earn 8 Non-Util Target Ga	lings Ana lity Comp Is Pipelin	lysis anies e Compa	ny ¹		
	1	2	3 residual	4	5 rate of	6 return on n	7 et worth	8
	adj. heta	unadj. beta	standard error	3-year average ²	4-year averane ²	5-year averane ²	5-year projected ³	
average for the proxy group of 248 non-utility companies comparable in total risk to the							L. Sloving	
targel gas pipeline company	0.97	0.92	3.7705					
target gas pipeline company	U.95	0.90	3./86/					
median				11.7%	12.0%	12.6%	15.5%	
average of the median	en e		2010 (J. 162) B		121%			
conclusion ⁵								13.8%
 ¹ The criteria for selection of the non-utility group group was selected based on an unadjusted be ²Ending 1992. ³1995-1998/1997-1999. ⁴ The average standard deviation of the target ga ⁵Equal weight given to both the average of the 3 (15.5%). Thus, 13.8% = (12.1% + 15.5% / 2). Source: Value Line Inc., March 15, 1994 Value Line Investment Survey 	p was that the non- ta range of 0.52 to s pipeline company -, 4- and 5-year his	utility compa 1.28 and a re 's unadjusted torical media	nies be domes sidual standar d beta is 0.125 ins (12.1%) an	stic and incluc d error range 0. d 5-year proj	led in <i>Value Li</i> of 3.2875 to ected median	ine Investment 4,2859. 4,2859. rate of returr	<i>Survey</i> . The nor 1 on net worth	n-utility

process. Consequently, we believe all utilities must be eliminated to avoid circularity. Moreover, we believe nondomestic firms must be eliminated because their reporting methods differ significantly from U.S. firms.

Step Four: We then eliminated those firms for which Value Line does not publish a "Ratings & Report" in *Value Line Investment Survey* so that the historical and projected returns on net worth⁶ are from a consistent source. We use historical returns on net worth for the most recent five years, as well as those projected three to five years into the future. We believe it is logical to evaluate both historical and projected return rates because it is reasonable to assume that investors avail themselves of both when they are available from widely disseminated information ser-

vices, such as Value Line Inc. The use of Value Line's return rates on net worth understates the common equity return rates for two reasons. First, preferred stock is included in net worth. Second, the net worth return rates are as of the end of each period. Thus, the use of average common equity return rates would yield higher results.

Step Five: Median returns based on the historical average three, four and five years ending 1992 and projected 1996-1998 or 1997-1999 rates of return on net worth are then determined as shown in columns 4 through 7 of table 1. The median is used due to the wide variations and skewness in rates of return on net worth for the non-utility firms as evidenced by the frequency distributions of those returns as shown in illustration 1. However, we show the average unadjusted beta, 0.92, and residual standard error, 3.7705, for the proxy group in columns 2 and 3 of table 1 because their frequency distributions are not significantly skewed, as shown in illustration 2.

Step Six: Our conclusion of a comcontinued on page 8





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parable earnings cost rate is based upon the mid-point of the average of the median three-, four- and five-year historical rates of return on net worth of 12.1 percent as shown in column 5 and the median projected 1996-1998/1997-1999 rate of return on net worth of 15.5 percent as shown in column 7 of table 1. As shown in column 8, it is 13.8 percent.

Summary

Our comparable earnings approach demonstrates that it is possible to select a proxy group of non-utility firms that is comparable in total risk to a target utility In our example, the 13.8 percent comparable earnings cost rate is very conservative as it is an expected achieved rate on book common equity (a regulatory allowed rate should be greater) and because it is based on endof-period net worth. A similar rate on average net worth would be about 20 to 40 basis points higher (i.e., 14.0 to 14.2 percent) and still understate the appropriate regulatory allowed rate of return on book common equity.

Our selection criteria are based upon measures of systematic and unsystematic risk, specifically unadjusted beta and residual standard error. They provide the basis for the objective selection of comparable non-utility firms. Our selection criteria rely on changes in market prices over approximately five years. We compare the aggregate total risk, or the sum of systematic and unsystematic risk, which reflects investors' aggregate assessment of both business and financial risk. Thus, no adjustments are necessary to the proxy group results to

Report Lists Pipeline, Storage Projects

More than \$9 billion worth of projects to expand the nation's natural gas pipeline network are in various stages of development, according to an A.G.A. report. These projects involve nearly 8,000 miles of new pipelines and capacity additions to existing lines and represent 15.3 billion cubic feet (Bcf) per day of new pipeline capacity.

During 1993 and early 1994, construction on 3,100 miles of pipeline was completed or under way, at a cost of nearly \$4 billion, says A.G.A. These projects are adding 5.4 Bcf in daily delivery capacity nationwide.

Among the projects completed in 1993 were Pacific Gas Transmission Co.'s 805 miles of looping that allows increased deliveries of Canadian gas to the West Coast; Northwest Pipeline Corp.'s addition of 433 million cubic feet of daily capacity for customers in the Pacific Northwest and Rocky Mountain areas; and the 156-mile Empire State Pipeline in New York.

In addition, major construction projects were started on the systems of Texas Eastern Transmission Corp. and Algonquin Gas Transmission Co. — both subsidiaries of Panhandle Eastern Corp. — and along Florida Gas Transmission Co.'s pipeline.

The report goes on to discuss another \$5 billion in proposed projects, which, if completed, will add nearly 5,000 miles of pipeline and 9.8 Bcf per day in capacity, much of it serving Florida and West Coast markets.

A.G.A. also identifies 47 storage projects and says that if all of them are built, existing storage capacity will increase by more than 500 Bcf, or 15 percent.

For a copy of New Pipeline Construction: Status Report 1993-94 (#F00103), call A.G.A. at (703) 841-8490. Price per copy is \$6 for employees of member companies and associates and \$12 for other customers.

compensate for the differences in business risk and financial risk, such as accounting practices and debt/equity ratios. Moreover, it is inappropriate to attempt a comparison of the target utility with any individual firm, or subset of firms, in the proxy group because only the average firm of the group is relevant.

Because the comparable earnings model is firmly anchored in the "corresponding risk" precept established in the landmark court decisions, it is worthy of consideration as a principal model for use in estimating the cost rate of common equity capital of a regulated utility. Our approach to the comparable earnings model produces a proxy group that is indeed comparable in total risk because the selection process is objective and quantitative. It therefore overcomes criticism linked to arbitrary selection processes.

All cost-of-common-equity models, including the DCF and CAPM, are fraught with deficiencies, usually stemming from the many necessary but unrealistic assumptions that underlie them. The effects of the deficiencies of individual models can be mitigated by using more than one model when estimating a utility's common equity cost rate. Therefore, when the non-comparability issue is overcome, the comparable earnings model deserves to receive the same consideration as a primary model, as do the currently popular market-based models.

²Charles F. Phillips Jr., <u>The Regulation of Public</u> <u>Utilities: Theory and Practice</u>, Public Utilities Reports Inc., 1988, p 379

³James C Bonbright, Albert L Danielsen and David R Kamerschen, <u>Principles of Public Utili-</u> <u>ties Rates</u>, 2nd edition, Public Utilities Reports Inc. 1988, p. 329.

⁴Jack Clark Francis, <u>Investments: Analysis and</u> <u>Management</u>, 3rd edition. McGraw-Hill Book Co., 1980, p. 363

⁵Id. p. 548

⁶Returns on net worth must be used when relying on Value Line data because returns on book common equity for non-utility firms are not available from Value Line

¹Bluefield Water Works Improvement Co. v. Public Service Commission. 262 U S 679 (1922) and Federal Power Commission v. Hope Natural Gas Co. 320 U.S 519 (1944).

United Water Rhode Island, Inc. Brief Summary of Common Equity Cost Rate

		Proxy Group of Nine Water
No.	Principal Methods	Companies
1.	Discounted Cash Flow Model (DCF) (1)	8.48 %
2.	Risk Premium Model (RPM) (2)	11.33
3.	Capital Asset Pricing Model (CAPM) (3)	9.36
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	10.67
5.	Indicated Common Equity Cost Rate before Adjustment for Business Risks	10.00 %
7	Business Risk Adjustment (5)	0.55
8.	Recommended Common Equity Cost Rate	10.55_%

- Notes: (1) From page 2 of this Schedule.
 - (2) From page 12 of this Schedule.
 - (3) From page 22 of this Schedule.
 - (4) From page 24 of this Schedule.
 - (5) Business risk adjustment to reflect United Water Rhode Island, Inc.'s greater business risk due to its small size relative to the proxy group as detailed in Ms. Ahern's accompanying direct testimony.

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the Proxy Group of Nine Water Companies

	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>
	Average Dividend	Value Line Projected Five Year Growth in	Reuters Mean Consensus Projected Five Year Growth	Zack's Five Year Projected Growth	Yahoo! Finance Projected Five Year Growth in	Average Projected Five Year Growth in	Adjusted Dividend	Indicated Common Equity Cos
Proxy Group of Nine Water Companies	Yield (1)	EPS (2)	Rate in EPS	Rate in EPS	EPS	EPS (3)	Yield (4)	Rate (5)
American States Water Co. American Water Works Co., Inc. Aqua America, Inc. Artesian Resources Corp. California Water Service Group	2.87 % 2.69 2.56 3.64 2.84	7.00 % 8.50 10.00 NA 7.00	1.00 % 8.90 7.40 NA NA	2.00 % 7.20 5.60 NA 6.00	1.00 % 6.90 5.80 4.00 6.00	2.75 % 7.88 7.20 4.00 6.33	2.91 % 2.80 2.65 3.71 2.93	5.66 % 10.68 9.85 7.71 9.26
Connecticut Water Service, Inc. Middlesex Water Company SJW Corporation York Water Company	2.90 3.61 2.57 2.66	6.50 4.00 7.50 6.50	NA NA NA NA	5.00 NA NA NA	5.00 2.70 14.00 4.90	5.50 3.35 10.75 5.70	2.98 3.67 2.71 2.74	8.48 7.02 13.46 <u>8.44</u>
Average								8.95_%
Median								8.48 %

NA= Not Available NMF = Not Meaningful Figure

Notes:

- Indicated dividend at 02/04/2014 divided by the average closing price of the last 60 trading days ending 02/04/2014 for each company.
- (2) From pages 3 through 11 of this Schedule.
- (3) Average of columns 2 through 5 excluding negative growth rates.
- (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 6) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for American States Water Co., 2.87% x (1+(1/2 x 2.75%)) = 2.91%.
- (5) Column 6 + column 7.

Source of Information:

Value Line Investment Survey www.reuters.com Downloaded on 02/05/2014 www.zacks.com Downloaded on 02/05/2014 www.yahoo.com Downloaded on 02/05/2014

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																			Page	3 01 3	4
AM	FR . (STA	TES	WAT	ER N	IYSE-A	WR P	ecent Rice	28.1	5 P/E RATIO	• 18 .	5 (Traili Media	ng: 17.9) an: 22.0)	RELATIVE P/E RATIO	0.9	9 DIV'D YLD	3.1	%	'ALUI LINE	Ξ	
TIMELIN	ess 3	Lowered	8/16/13	High: Low:	14.5 10.1	14.5 10.8	13.4 10.4	17.3 12.2	21.9 15.1	23.1 16.8	21.0 13.5	19.4 14.9	19.8 15.6	18.2 15.3	24.1 17.0	33.1 24.0			Target	Price	Range
SAFETY	2	Raised 7	/20/12	LEGEN	NDS 25 x Divide	ends p sh						_							2010	2017	2010
TECHNI		Raised 1	/10/14	div Re	vided by In	iterest Rate e Strength															
BETA .6	6-18 PR	OJECTIC	ONS	3-tor-2 sp 2-for-1 sp Options	lit 6/02 lit 9/13 Ves										\sim	2-fo	r-1				
F	rice	Ai Gain	nn'l Total Return	Shaded	areas indi	cate reces	sions														30
High Low	40 (+ 30 -	-40%) (+5%)	12% 5%						that	ասերի	, li				اقلى	րորդու	-				25 20
Insider	Decisi	ions			يالىي			սել	ղողութ			n nininininininininininininininininini kata kata kata kata kata kata kata kat	երերերեր	ուսկու							15
to Buy	F W A 0 0 0 0 0 1	2 1 0	0 1 0	IIII IIIIIIIII		Uu. uu	արո														10
to Sell		$\frac{4}{5}$ $\frac{4}{5}$ $\frac{0}{0}$	0000			•••••				.	l. •	•				1		% тот	Returi	N 12/13	_7.5
institu	101121	2Q2013	3Q2013	Percen	t 12 -	•••	••••••	········		╍┥ _{┥┥╽┥} ╿╿╿╿		<u> `•</u>	-,,,,					1.vr	THIS V STOCK	INDEX	_
to Buy to Sell	93 59 24064	98 70	72 90 22052	shares traded	8 - 4 -									╈╍┿╍╹╵╹╹	*****			3 yr.	82.5 102.2	52.8 211.8	F
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	©VALU	JE LINE PU	JB. LLC	16-18
5.72	5.51	6.45	6.08	6.53	6.89	6.99	6.81	7.03	7.88	8.75	9.21	9.74	10.71	11.12	12.12	12.20	12.50	Revenue	s per sh		13.50
.92	.54	.60	.64	.67	.67	.39	.53	.66	1.45 .67	.81	.78	.81	1.11	1.12	2.40 1.41	2.50	1.60	Earnings	spersh /	A I	2.95 1.80
.42	.42	.43	.43	.43	.44	.44	.44	.45	.46	.48	.50	.51	.52	.55	.64	.76	.84	Div'd De	cl'd per s	h ^B ∎	1.00
5.62	1.50 5.74	5.91	6.37	6.61	7.02	6.98	7.51	7.86	8.32	8.77	2.23 8.97	2.09 9.70	10.13	10.84	11.80	2.30	13.25	Book Va	enaing pe lue per st	ersn 1	2.50 16.25
26.87	26.87	26.87	30.24	30.24	30.36	30.42	33.50	33.60	34.10	34.46	34.60	37.06	37.26	37.70	38.53	39.00	40.00	Common	n Shs Out	st'g ^C	43.00
.84	15.5 .81	.97	15.9	.86	18.3	1.82	1.23	1.17	1.50	24.0 1.27	1.36	21.2	15.7	15.4	14.3 .91	18.4		Avg Ann Relative	P/E Ratio	10	19.5 1.30
5.5%	5.0%	4.2%	4.2%	3.9%	3.6%	3.5%	3.6%	3.1%	2.5%	2.5%	2.9%	2.9%	3.0%	3.2%	3.1%	2.7%		Avg Ann	'l Div'd Yi	ield	3.1%
CAPITA Total De	L STRU	CTURE a	is of 9/30 Due in 5 \)/13 Yrs \$10 6	mill	212.7	228.0	236.2	268.6	301.4	318.7	361.0	398.9	419.3	466.9	475	500	Revenue	es (\$mill)		580 77 0
LT Debt	\$332.1 i	nill. L	T Interes	st \$16.0 n	nill.	43.5%	37.4%	47.0%	40.5%	42.6%	37.8%	38.9%	43.2%	41.7%	39.9%	38.0%	40.0%	Income 1	Tax Rate		40.0%
coverage	est eani	eu. 5.2X.		(41% 0	f Cap'l)	 52.0%			12.2%	8.5%	6.9%	3.2%	5.8%	2.0%	2.5%	2.5%	2.5%	AFUDC 9	% to Net F	Profit	2.5%
Leases, Pension	Uncapil Assets	alized: / -12/12 \$'	Annual re 107.6 mill	ntals \$3.0	mill.	52.0% 48.0%	52.3%	50.4% 49.6%	40.0% 51.4%	40.9% 53.1%	40.2% 53.8%	45.9% 54.1%	44.3% 55.7%	45.4% 54.6%	42.2% 57.8%	40.5% 59.5%	40.0% 60.0%	Commor	n Equity R	latio	41.0% 59.0%
Pfd Sto	k None.		Oblig. \$1	63.2 mill.		442.3	480.4	532.5	551.6	569.4	577.0	665.0	677.4	749.1	787.0	825	880	Total Ca	pital (\$mi	II)	1200
Commo	n Stock	38 717 5	10 she			4.6%	5.2%	5.4%	6.0%	6.7%	6.4%	5.9%	7.6%	7.1%	8.3%	8.0%	8.0%	Return o	n Total C	ap'l	7.5%
as of 11	/1/13	00,717,0				5.6%	6.6%	8.5%	8.1%	9.3%	8.6%	8.2%	11.0%	10.3%	11.9%	12.0%	12.5%	Return o	n Shr. Eq	uity	11.5%
MARKE	T CAP: S	\$1.1 billi	on (Mid C	Cap)		NMF	1.0%	2.8%	2.7%	9.3%	3.1%	3.2%	5.8%	5.3%	6.6%	6.0%	6.0%	Retained	to Com I	Eq	5.0%
CURRE (\$MIL	NT POSI L.)	TION	2011	2012	9/30/13	113%	84%	67%	67%	58%	64%	61%	47%	49%	45%	49%	53%	All Div'd	s to Net F	Prof	56%
Cash As Other	ssets	1	1.3 64.3	23.5 160.5	26.2 176.4	BUSIN compa	ESS: Ar nv. Thro	nerican S ugh its i	States W	ater Co. subsidiar	operate v. Golde	s as a en State	holding Water	ers in the County.	he city c Sold Ch	of Big Be Japarral (ear Lake City Wate	and in a of Arizo	areas of ona (6/11	San Ber). Has 7	nardino 28 em-
Current	Assets	1	65.6 37.9	184.0	202.6	Compa	iny, it su	oplies wa	ter to mo	ore than	250,000	customer	s in 75	ployees.	Officer	s & dire	ctors ow	n 2.9%	of comm	on stock	(4/12
Debt Du Other	ie		.3	3.3 49.8	3.4 49.4	metrop	olitan are	as of Lo	s Angeles	and Ora	ange Cou	inties. Th	e com-	Sprowls	. Inc: CA	A. Addr:	630 Eas	t Foothill	Bouleva	rd, San	Dimas,
Current	Liab.	1	04.4	93.7	115.7	pany a	lso provi	des elect	ric utility s	services	to nearly	23,250 c	ustom-	CA 917	73. Tel: 9	09-394-3	3600. Inte	ernet: ww	w.aswate	r.com.	- (1+-
	L RATES	4 S Past	•01% Pa	st Est'd	450%	Ame utili	ericar ity b	i Sta usine	tes v ss pi	vater' robab	s com oly ju	re wa 1st c	ater om-	from	opei this	ration sector	s. Inc	deed, d grov	annu: v to a	al pr s hig	h as
of change Revenu	e (per sh) es	10 Yrs. 5.5	5Yı %7.	rs. to 5%	' 16-'18 3.0%	plet	ed a	a hi	ghly	pro	fitab	e 2	013.	\$0.50	a sh	are o	ver th	e nex	t thre	e- to	five-
"Cash F Earning	low" s	6.5 6.5	% 9. % 11.	0% 5%	4.5% 7.0%	Gate	e Wat	er's o	contrib	oution	to s	hare	net	Fina	nces	are h	ealth	y. Int	ernall	y gen	era-
Dividen Book Va	ds alue	3.0 5.0	% 4. % 5.	5% 1 5%	0.0% 7.0%	rose	a v ito h	vhopp igher	ing 2 admi	28%. nistra	This	occu and	rred	ted f	funds	shou	ld be	struct	icient	to c	over for
Cal-	QUAR	TERLY RE	VENUES (\$ mill.)	Full	chas	ed wa	ter co	sts an	id a si	naller	conti	ribu-	the	forese	eable	futu	re. As	s a r	esult,	we
endar 2010	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year 398.9	tion	from	the o	compa	ny's i were	nonuti	lity t	off-	think	that atio	the should	strong 1 rem	g equit	ty-to-t	otal o	api- solid
2011	94.3	109.8	119.9	95.3	419.3	set	by in	crease	d rev	enue	resul	ting f	from	57%.	Refle	cting	this	is the	comp	bany's	Fi-
2012 2013	107.6	114.3 120.7	133.5	111.5 112.9	466.9 475	the i We	mpler	nenta elativ	tion of elv bi	i high ullish	er rate on A	es. A meri	can	nanci est gi	ial Sti rade o	rengtl of anv	ı ratii watei	ng of a r utilit	an A, v.	the h	nigh-
2014	115	125 DNINCS D	140	120	500	Stat	es' no	nuti	lity b	usine	ss. Tł	ne con	npa-	The	com	pany	's lo	ng-te	rm e	divid	end
Cal- endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Full Year	ny r milit	ary b	ases	ater s throug	ystem gh its	ASU	mne S sub	U.S. sidi-	grow The	equity	r ospe 's vie	ld is (close t	o the	as v	ven. 1 for
2010	.23	.24	.31	.33	1.11	ary.	Ther	e is	ongoi	ng de	ebate	on V	Wall	the v	vater	utility	y grou	ip. Ho	wever	, its o	divi-
2012	.19	.40	.42	.26	1.41	secto	et reg or. Soi	ne fee	el that	the c	ompa	ny's e	arn-	2016-	2018	are s	signifi	cantly	abov	e the	in-
2013 2014	.35 .33	.43 .42	.53 .55	.24 .30	1.55 1.60	ings	peak	ed in	2012	when	n the	y con	trib-	dustr	y ave	erage.	Thus	, inve	stors	curre	ntly
Cal-	QUAR	TERLY DIV	IDENDS P	AID B	Full	line.	We a	re on	the ot	her si	ide of	this a	rgu-	the s	tock a	as the	ay as y had	l to in	the pre	past.	And,
endar 2010	Mar.31	Jun.30	Sep.30	Dec.31	Year 50	men	t. Am	erican	State	es' lon	g exp	erienc	e in it to	while	the	e noi	nutilit	y op	eratio	ns l	nave
2011	.13	.14	.14	.14	.52	win	more	bids	from	army	base	s thro	bugh	tabili	ty co	mpare	ed to	its p	eers,	we t	hink
2012 2013	.14 .1775	.14 .1775	.1775 .2025	.1775 .2025	.64 .76	2016 utili	5-2018 tv is i	, in o nvolva	ur op ed in f	inion. the bi	Curr dding	ently, for 10	the 0 in-	the s	tock i	s still	attra	ctive o	on a ri	isk-re	turn
2014						stall	ations	that	are	lookin	ig to	outso	urce	Jame	es A. 1	Flood		J_{i}	anuar	y 17,	2014

(A) Primary earnings. Excludes nonrecurring due to rounding. gains/(losses): '04, 7¢; '05, 13¢; '06, 3¢; '08, (B) Dividends historically paid in early March, (14¢); '10, (23¢) '11, 10¢. Next earnings report due early February. Quarterly egs. may not add vertice of the material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.



James A. Flood

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AM	ERIC	CAN	WAT	ER N	YSE-	WK	R P	ecent Rice	41.7	1 P/E RATI	• 18.	1 (Traili Medi	ing: 20.5) an: NMF)	RELATIV P/E RATI	6 0.9	7 DIV'D YLD	2.8	% VAL	UE	
TIMELI	vess 3	Raised 10	0/4/13							High:	23.7	23.0	25.8	32.8	39.4	45.1		Tar	get Price	Range
SAFET	7 3	New 7/25	108	LEGE	NDS		<u> </u>			LOW.	10.5	10.2	19.4	20.2	51.5	37.0		20	16 2017	2018
TECHN	ICAI 3	Blowered	8/9/13	1.0 div	00 x Divide vided by In	ends p sh terest Rate	. –													80
BETA .	65 (1.00 =	Market)	0///10	Options:	elative Pric Yes	e Strength														60
201	6-18 PR	OJECTIC	DNS	Shaded	areas indi	cate recess	sions								\sim		•-			- 50
	Price	Ar Gain	nn'l Total Return												րուրու		-			30
High	65 (-	+55%)	17%								aluta			and a					_	
Inside	40 (· r Decis	+10%) ions	5%									1 Internation								15
monae	FMA	MJJ	ASO																	- 15
to Buy Options	000	000	0 0 0									•••								10
to Sell	0 8 0	300	0 0 0								**.*	•••			*******	*****************		% TOT. RET	URN 12/13	7.5
Institu	102013	202013	1S 302013										••••	******				THIS	VL ARITH.' INDEX	
to Buy	191	165	197	shares	t 21 - 14 -									սևև				1 yr. 16.1	38.4	F
to Sell Hid's(000)	186 145912	209 144834	176 144172	traded	7 -													5 yr. 139.0	211.8	Τ
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006 ^E	2007	2008	2009	2010	2011	2012	2013	2014	© VALUE LIN	E PUB. LLC	16-18
									13.08	13.84	14.61	13.98	15.49	15.18	16.25	16.15	17.20	Revenues per	sh	20.00
									.65	d.47	2.87	2.89	3.56	3.73	4.27	4.45	4.70	"Cash Flow"	bersh	5.25
									0.97	02.14	1.10	1.25	1.53	1.72	2.11	1.06	2.40	Earnings per Div'd Decl'd r	oreh B∎	2.90
									4.31	4.74	6.31	4.50	4.38	5.27	5.25	5.15	5.50	Cap'l Spendir	a per sh	5.50
									23.86	28.39	25.64	22.91	23.59	24.11	25.10	26.15	27.50	Book Value p	ersh D	31.85
									160.00	160.00	160.00	174.63	175.00	175.66	176.99	178.50	180.00	Common Shs	Outst'g ^C	185.00
											18.9	15.6	14.6	16.8	16.7	18.6		Avg Ann'l P/E	Ratio	18.5
											1.14	1.04	.93	1.05	1.07	1.04		Relative P/E F	atio d Viold	1.25
											1.9%	4.2%	3.0%	3.1%	2.1%	2.0%	0400	Avg Ann i Div		2.1%
Total D	AL SIRU ebt \$567	72 mil D	is of 9/30 Due in 5 \	//13 Yrs \$1034	4 0 mil				2093.1 d155.8	2214.2 d242.2	2336.9	2440.7	2/10.7	2666.2	28/6.9	2885	3100	Revenues (\$n	ill) illy	3/00
LT Deb	t \$5174.1	mil. L	T Interes	st \$301.0	mil.						37.4%	37.9%	40.4%	39.5%	40.7%	38.5%	38.0%	Income Tax R	ate	38.0%
(Total ir	nterest co	verage: 4	1.4x)	(53% o	f Cap'l)									12.5%	6.2%	4.0%	8.0%	AFUDC % to N	let Profit	8.0%
Leases	, Uncapi	talized: A	Annual re	ntals \$28.	.1 mill.				56.1%	50.9%	53.1%	56.9%	56.8%	55.7%	53.8%	52.5%	52.0%	Long-Term De	bt Ratio	51.5%
Pensio	n Assets	\$1157.7	7 mill	621.2 mill	1				43.9%	49.1%	46.9%	43.1%	43.2%	44.2%	46.0%	47.5%	48.0%	Common Equ	ty Ratio	48.5%
Pfd Sto	ck \$17.6	mill. F	ong. on fd Div'd	\$.7 mill					8692.8	9245.7	8750.2	9289.0	9561.3	9580.3	9652.7	9880	10400	Iotal Capital (\$mill) IIV	12200
	~ .		407 1						NMF	NMF	37%	3.8%	4 4%	4.8%	5.5%	5.5%	5.5%	Return on Tot	ii) al Can'l	6.0%
as of 10	on Stock 0/31/13	178,274,	197 sns.						NMF	NMF	4.6%	5.2%	6.5%	7.2%	8.4%	8.5%	8.5%	Return on Shi	Equity	9.0%
									NMF	NMF	4.6%	5.2%	6.5%	7.2%	8.4%	8.3%	8.5%	Return on Cor	n Equity	9.0%
MARKE	T CAP:	\$7.4 billi	on (Larg	e Cap)					NMF	NMF	3.0%	1.8%	2.8%	3.5%	4.6%	4.5%	4.5%	Retained to C	om Eq	4.5%
CURRE (\$MI	INT POS	ITION	2011	2012	9/30/13						34%	65%	56%	52%	45%	48%	50%	All Div'ds to N	et Prof	48%
Cash A	ssets	13	14.2	24.4	32.4	BUSIN	ESS: Am	nerican V	Vater Wo	rks Com	pany, In	c. is the	largest	account	ting for 2	2.2% of	revenues	. Has roughly	7,000 em	ployees.
Curren	t Assets	13	97.7 -	499.4	613.2	service	s to over	14 millio	n people	in over 3	ity in the 0 states	and Can	ada. It's	commo	ation rate	e, 2.6% I outstandi	1 12. Bia na. Off.	& dir. own le	owns 10.3 ess than 1	% 01 the
Accts F	Payable	2	43.7	279.6	209.8	nonreg	ulated b	usiness	assists r	nunicipali	ties and	military	bases	Proxy).	Presider	nt & CEO	; Jeffry S	Sterba. Chairn	an; Georg	e Mack-
Other	ue	7	01.5	329.3	428.6	with th	e mainte	nance a	nd upkee	ep as we	II. Regul	lated ope	erations	enzie. A	Address:	1025 Lau	rel Oak	Road, Voorhee	es, NJ 0804	13. Tele-
Curren	t Liab.	14	89.1	994.8	1141.5	made t	10 89.1%	01 2012	revenues	. New Je	rsey is it	s biggesi	market	phone:	800-340-	8200. Int	emet: wv	/w.amwater.co	m.	
Fix. Ch	g. Cov.	2	56%	292%	300%	Ame	ericar	Wat	er Wo	rks d	warf	s mos	st of	For e	examp	ole, An	nerica	n Water	has red	uced
of chang	e (per sh)	5 Past 10 Yrs.	Ра 5 Үн	sí ⊏SťÓ rs. to '	'16-'12 '16-'18	wide	peers mai	. 111ê rgin	than	anv	of t	the o	oy a other	close	to 40	e rat % tod	av. Tł	on 42% Ne compai	uu ∠U. ∖v g∩al	isto
Reveni	Jes Flow"		3.	0%	4.0% 5.5%	inve	stor-ov	wned	utilit	ies ir	ıclude	d in	the	redu	ce this	s figur	e to 3	5% over	the nex	t five
Earning	js				8.5%	indu	stry g	roup	follow	ed by	Value	e Line	. In-	year	perio	d. Ŭ				
Book V	ias 'alue		 1.	.5%	7.5% 4.5%	deed	$\frac{1}{2}$, the $\frac{1}{2}$	utility	alone	e accoi	unts f	or app	orox-	Exce	ellent	cost	cont	rois help	Amer	ican hing

deed, the utility alone accounts for approx-Excellent cost controls help American Water maintain good relationships with regulators. All utilities are exposed imately 50% of the entire industry when measured by market capitalization. Size matters in the water utility busito the risk of harsh treatment by state ness. Currently, the market is made up of authorities. By managing expenses so rigorously, the company has been able to considerably reduce the chance of this tens of thousands of small water utilities run by local municipalities. Due to financial pressures, most of these systems have not been properly maintained and are in happening. American Water offers good value vis-a-vis other water utilities. Historically, dire need of modernization. Thus, it is more advantageous for these smaller

water stocks with above-average dividend growth prospects have much lower current yields than similar water stocks with subpar dividend potential. (This is the premium that investors must pay for greater fu-ture cash flows.) In the recent past, the yield spreads between the high-and lowquality stocks has narrowed considerably. Thus, this is a good time to take positions in industry leaders such as American Water because they are cheap on a relative value basis. James A. Flood

January 17, 2014

(A) Diluted earnings. Excludes nonrecurring losses: '08, \$4.62; '09, \$2.63; '11, \$0.07. Dis-continued operations: '06, (4¢); '11, 3¢; '12, (10¢). Next earnings report due early February.

QUARTERLY REVENUES (\$ mill.)

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

786.9

760.9

831.8

829.2

900

.71

.73 .87

.84

1.00

.22 .22

.23 .25

.28 .28

671.2

668.8

745.6

724.3

EARNINGS PER SHARE A

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

QUARTERLY DIVIDENDS PAID B=

Mar.31 Jun.30 Sep.30 Dec.3

775

.42

.42

.66

57

.65

.21

.23 .23

.25

Cal-

endar

2010

2011

2012

2013

2014

Calendar

2010

2011

2012

2013

2014

Cal-

endar

2010

2011

2012

2013

2014

588.1

596.7

618.7

636.1

675

.18

.23 .28

.32

.35

.21

.22

.23

.25

664.5

639.8

680.8

695.4

750

.23

.32 .30

.47

.40

.23

.25

Full

Year

2710.7

2666.2

2876 9

2885

3100

Full Year

1.53

1.72

2.11

2.20

2.40

Full

Year

.86

.91

.96

1.06

each of the past two years.

 Quarterly earnings may not sum due to rounding. (B) Dividends paid in March, June, September, and December.
 Image: The section of the sectio

entities to sell their operations to concerns

that have both the financial wherewithal

and managerial experience required to ad-

dress the problems. American Water has

added almost 20 new acquisitions over

A decent amount of American Water's

profit growth comes from the success-

ful integration of acquisitions. With its

large infrastructure, the company has con-

sistently been able to reduce costs and squeeze efficiencies out of its purchases.

Company's Financial Strength Stock's Price Stability B+ 95 Price Growth Persistence Earnings Predictability 75 20

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Exhibit No. Schedule PMA-8 Rebuttal

																			Page	5 of 3	4
AQ	UA A	AME	RIC A		E-WTR		R P	ecent Rice	23.09	P/E Rati	o 19 .	9 (Traili Medi	ing: 20.6 an: 24.0)	RELATIVI P/E RATI	[€] 1.0	7 DIV'D YLD	2.8	8%	/ALUI LINE	Ξ	
TIMELIN	VESS 3	Lowered	5/24/13	High: Low:	12.0 7.7	13.4 9.5	14.8 11.3	23.4 14.0	23.8 16.1	21.3 15.1	17.6 9.8	17.2 12.3	18.4 13.2	19.0 15.4	21.5 16.8	28.1 20.6			Target 2016	Price	Range 2018
SAFET		Raised 4	/20/12	LEGEN	NDS 60 x Divide	ends p sh															64
BETA (ICAL 🕻	D Raised 1 = Market)	2/27/13	Re	vided by in elative Pric blit 12/01	e Strength	·									5-fo	or-4				48
201	6-18 PR	OJECTI		5-for-4 sp 4-for-3 sp	olit 12/03 olit 12/05			4	-for-3							\					32
	Price	Gain	Return	5-for-4 sp Options:	olit 9/13 Yes areas indi	cato rocoss	ions			- 10						,սորը հեր	•				24 20
Low	40 (· 25 (·	+75%) +10%)	17% 5%	Shaucu				1011 11. i	իրիս			ilp _{bilo}	սուրող	սոսիր	put'						16
Inside	r Decis FMA	ions M J J	ASO	<u>1</u> 11	וייו געשיין	m ^{ull}	100 Juli														12
to Buy Options	0 0 0 2 2 0	000	0 0 0 2 1 1	μ <u>ι</u>	<u> </u>				••••		•	•••									-8
to Sell	0 0 0 tional I	0 2 0	0 1 1 ns		•••••	••••••	••••••		*******	···		•••						% TOT	RETUR	N 12/13	_0
	1Q2013	2Q2013	3Q2013	Percen	t 15 –				<u> </u>	, IIIIIIII			•••••	•••••	••••	•••••••		1 vr	THIS V STOCK	INDEX	L
to Buy to Sell	136	141 130 82501	153 154 95172	shares traded	10 - 5 -		ululu.d		┟╴╷╫╶┼╷╖╫									3 yr.	42.1	52.8 211.8	=
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	© VALI	JE LINE P	JB. LLC	6-18
1.61	1.67	1.93	1.97	2.16	2.28	2.38	2.78	3.08	3.23	3.61	3.71	3.93	4.21	4.10	4.32	4.55	4.60	Revenue	es per sh		4.95
.45	.49	.58	.61	.69	./6	.//	.87	.97	1.01	1.10 57	1.14	1.29	1.42	1.45	1.51	1.85	1.95	"Cash F Earning	low" per : s per sh 4	sh N	1.85 1.45
.19	.20	.22	.23	.24	.26	.28	.29	.32	.35	.38	.41	.44	.47	.50	.54	.58	.64	Div'd De	cl'd per s	h ^B ∎	.86
.46	.65	.72	.93	.87	.96	1.06	1.23	1.47	1.64	1.43 5.85	1.58	1.66	1.89	1.90	1.98	1.90	1.90	Cap'l Sp Book Va	ending p lue ner sl	ersh	2.15 11 50
84.33	90.25	133.50	139.78	142.47	141.49	154.31	158.97	161.21	165.41	166.75	169.21	170.61	172.46	173.60	175.43	177.00	179.50	Commo	n Shs Out	sťg ^C	184.00
17.8	22.5	21.2	18.2	23.6	23.6	24.5	25.1	31.8	34.7	32.0	24.9	23.1	21.1	21.3	21.9	21.4		Avg Ann Beletive	I'l P/E Rat	io	22.5
3.9%	2.9%	3.0%	3.3%	2.5%	2.5%	2.5%	2.3%	1.8%	1.8%	2.1%	2.8%	3.1%	3.1%	2.8%	2.8%	2.4%		Avg Ann	'l Div'd Y	ield	2.6%
CAPITA	L STRU	CTURE a	as of 9/30)/13		367.2	442.0	496.8	533.5	602.5	627.0	670.5	726.1	712.0	757.8	770	825	Revenue	es (\$mill)		915
Total D	ebt \$163 t \$1439.3	60.5 mill. I 3 mill. I	Due in 5 ` _T Interes	Yrs \$368. st \$60.0 n	3 mill. nill.	67.3	80.0	91.2	92.0	95.0	97.9	104.4	124.0	144.8	153.1	200	225	Net Prof	it (\$mill)		265
(LT inte	rest earn	ed: 5.0x;	total inte	rest cover	rage: f Can'l)									2.9%	39.0%	1.5%	2.0%	AFUDC	% to Net F	Profit	40.0 <i>%</i> 2.0%
Pensio	n Assets	s-12/12 \$	190.1 mill	(01/00 . .		51.4%	50.0%	52.0%	51.6%	55.4%	54.1%	55.6%	56.6%	52.7%	52.7%	51.0%	51.0%	Long-Te	rm Debt F	latio	50.0%
Pfd Sto	ck None		0	blig. \$303	3.1 miii.	48.6%	50.0%	48.0%	48.4%	44.6% 2191.4	45.9%	44.4% 2495.5	43.4%	47.3% 2646.8	47.3%	49.0%	49.0% 3350	Total Ca	n Equity F pital (\$mi	(atio	50.0% 4230
Commo as of 10	on Stock)/24/13	176,709	,658 shar	res		1824.3	2069.8	2280.0	2506.0	2792.8	2997.4	3227.3	3469.3	3612.9	3936.2	4150	4350	Net Plan	t (\$mill)	,	4900
						6.4% 10.2%	6.7% 10.7%	6.9%	6.4% 10.0%	5.9% 9.7%	5.7% 9.3%	5.6% 9.4%	5.9%	6.9%	6.6%	7.0%	6.0% 13.0%	Return o	n Total C n Shr. Eo	ap'l uitv	6.5% 12.5%
MARKE	T CAP:	\$4.1 billi	on (Mid (Cap)		10.2%	10.7%	11.2%	10.0%	9.7%	9.3%	9.4%	10.6%	11.6%	11.0%	13.0%	13.0%	Return o	n Com E	quity	12.5%
CURRE (\$MI	NT POS	ITION	2011	2012	9/30/13	4.2%	4.6%	4.9%	3.7%	3.2% 67%	2.8%	2.7%	3.7%	4.6%	4.3%	6.5% 50%	6.0%	Retained	I to Com I	Eq	5.0% 50%
Cash A	sséts. ables		8.2 81.1	5.5 92.9	6.4 98.3	BUSIN	ESS: Ag	ua Amer	ica Inc is	the ho	olding cor	mpany fo	or water	& other	23.4%	Officers	and dire	ectors on	n 14%	of the c	ommon
Invento Other	ry (Avg	Cst)	11.2 220.0	11.8 150.7	12.4 94.5	and wa	stewater	utilities	that serve	approxi	mately th	ree millio	on resi-	stock; I	Blackrock	(, Inc, 6	6.3%; Sta	ate Stree	t Capita	Corp.,	5.7%;
Current	t Assets		320.5	260.9	211.6	Jersey,	Florida	yivania, a, India	na, and	five of	other st	ates. A	cquired	Officer:	Nicholas	s DeBer	edictis.	ky). Chai Incorpora	ted: Per	insylvani	a. Ad-
Debt D	ue		80.4	125.4	191.2	AquaSo	ource, 7/ enues '1	03; Cons 2 [.] reside	umers Wat	ter, 4/99 %: com	ercial 1	ners. Wat 6 1% [,] in	ter sup- dustrial	dress: 19010	762 Wes Telephon	st Lanca	aster Ave 25-1400	enue, Bry Internet	/n Mawr www.agu	, Penns Jaameric	ylvania a com
Current	t Liab.		425.7	274.2	318.3	Aau	a Am		has o	exite	d the	e Flo	rida	the 1	use of	fa"	repair	tax	deduc	tion".	we
ANNUA	g. Cov.	S Past	367% Pa	398% st Est'd	398%	mar	ket. I	in five	separ	ate t	ransa	tions	, the	think	the	compa	any po	osted	a gair	in s	hare
of change	e (per sh)	10 Yrs	. 5 Yi	rs. to	'16-'18 2 5%	Suns	ty sol shine	d off State	all of 1 for a	its oj total	of S9	ons ir 10 mil	i the llion.	net o perha	f over aps. v	vould	last y	ear. N 1e uti	1ore 11 litv's	mpres abilit	sive
"Cash	Flow"	8.5	% 8. % 4	0%	4.0%	This	will	allow	the c	ompa	any to	focu	s its	top la	ast ye	ar's e	xcepti	ional g	gain b	y 9%	this
Divider	ids alue	7.5	5% 8. 1% 7	.0%	9.5% 8.0%	atter	ntion ts are	in the	e state entrate	swh d.	iere n	10ST 0	of its	year. tion	Most of cos	of thi t redu	is will uction	be du s and	the i	comt mpler	nen-
Cal-		TERLY RE	EVENUES	(\$ mill.)	Full	Gro	wth	thro	ough	acq	uisiti	on	will	tatio	n of	highe	er rat	tes in	nplem	ented	by
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	stra	aın a tegv.	i key Aqua	stone purcha	or t ased	he c 13 uti	o mpa ilities	ny s last	state Hvd	regui r auli o	ators.	ackin	ng r	orovio	les	op-
2010	160.5	178.5 178.3	207.8 197.3	179.3 172.7	726.1	year	and	18 ¹ in	2012.	We	think	that	this	port	unitie	es fo	r Aq	ua's	nonr	egula	ted
2012	164.0	191.7	214.6	187.5	757.8	num ahea	ber w d. Tł	nat's l	ually 1 because	ncrea e the	ase in U.S.	the y	ears	earn copio	i ngs. us am	This	drillir s of wa	ig tecl ater. A	nnique Agua l	e requ nas er	ures iter-
2013	180.0 190	195.7 215	204.3 225	200	830	lated	l with	thou	sands o	of sm	all m	ınicip	ally-	ed in	to a j	joint	ventu	re on	a pip	eline	that
Cal-	E/	ARNINGS	PER SHAR	EA Dua 24	Full	acros	ea w ss the	ater e coui	utiliti ntrv a	es. re st	Becau ruggli	ise c ing fi	nan-	elimi	bring	g wat g the	er di	rectly d for	to t thou	ne w Isands	ells, s of
endar 2010	Mar.31	Jun.30	26	Dec.31	Year .72	cially	y, the	y are	havin	g tr	ouble	finan	cing	truck	s lade	en wit	th wat	ter cho	oking	the st	reet
2011	.18	.22	.24	.19	.83	frast	costs o ructu	of repa res. M	airing † Ianv ar	their re fin	agıng ding i	, wate t easi	er in- er to	runn	c in P ing, w	ennsy /e thi	nk th	a. wh at this	en ful	add a	and bout
2012	.15	.24 .30	.29 .36	.19 .23	.8/ 1.15	sell	their	oper	ations	tol	larger	inve	stor-	\$0.10) a sha	are to	the b	ottom	line.		
2014	.25	.32	.40	.28	1.25	owne whei	ea cor rewith	npani 1al to	es tha fund th	ι nav ne ne	ve the eded (a nnai capita	l ex-	Aqua othe	a stoc r wai	ck is ter u	attra tilitie	s. Wh	com ile th	p are e vie	i to ld is
Cal- endar	Mar.31	Jun.30	Sep.30	Dec.31	Full Year	pend	litures	s. Mo	reover,	Aqu	ia car	ı run	the	marg	inally	lowe	r that	n the	group	aver	age,
2010	.116	.116	.116	.124	.47	oper man	ations ageme	ata ente:	much spertise	iowe e an	er cost d eco	usin nomie	g its s of	this stron	is mo g div	ore th idend	ian of	uset l th pr	oy the	e equ s. Th	itys ere-
2011 2012	.124 .132	.124 .132	.124 .132	.132 .14	.50 .54	scale		1 6 11						fore,	conse	ervati	ve, ir	icome	seeki	ng in	ves-
2013	.14	.14	.152	.152	.58	Aqu a so	a wil lid 2	i tolla 014. i	ow up in our	a sti ' opi	rong 2 nion.	Aide X	with d bv	tors 1 Jame	inight es A. I	rina 1 Flood	inese	snares	s of in <i>anuar</i>	terest y <i>17.</i>	2014
(A) Dilute	ed egs. E	Excl. non	rec. gains	(losses):	earn	ings repo	ort due ea	arly Febru	uary.	•	(C) In mi	llions, ad	justed for	stock sp	lits.	Co	mpany's	Financia	I Strengt	h	B++

5	,
Company's Financial Strength	B++
Stock's Price Stability	100
Price Growth Persistence	70
Earnings Predictability	100
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Exhibit No.___ Schedule PMA-8 Rebuttal

ARTE	SIA	N R	ES. (COR	P. 1	NDQartn/	A RE PR	ICE 23.	70 TRAILIN	lio 24.7	P/E RATIO 1.2	1 PIV'D 3	.5% VA	LUE NE	
	RANI	KS		22 17	2.62 7.20	22.33 17.90	20.67 18.26	19.31 13.00	18.73 12.81	19.5 16.4	59 19.99 13 15.16	24.43 18.20	24.27 21.52	High Low	
PERFORMA	ANCE	3 Av	rerage		LEGE	INDS							<u></u>	•	
Technical		3 AV	rerage		12 Mo Rel Pri	s Mov Avg	╸╡╡╵╵╏╻╻╻╻╻			111111111111	·+++++++++++++++++++++++++++++++++++++			18	
SAFETY		3 AV	erage	Shaded	area ind	licates recession		•						13	
BETA .55		(1.00 = N	Market)			· ·	•••	•••••	· · ·					8	
		(,				· · · · ·	· ·	· · ·	•••••••	•			5	
Financial St	ronath		в								•••••	••••	••••••	4	
Dries Ctabili	inengun i		05										••••	3	
Price Stabili		• .	90											2	
Price Growt	n Pers	istence	50										1 .	475	
Earnings Pro	edictal	oility	85							$\frac{1}{10000000000000000000000000000000000$				VOL. (thous.)	
© VALUE LI	INE PU	BLISHIN	NG LLC	200	5	2006	2007	2008	2009	2010	2011	2012	2013	2014/2015	
SALES PER	SH			7.	52	7.77	7.20	7.59	8.11	8.48	7.56	8.10			
"CASH FLO	W" PE PER SI	R SH H		1.	56 81	1.75 97	1.57 90	1.65 86	1.84 97	1.92	1.64	2.04 1.13	 1.02 ^{A,B}	1.23 ^C /NA	
DIV'DS DEC	L'D PE	R SH			58	.61	.66	.00	.72	.75	.76	.79		1120 /11/1	
CAP'L SPEN		PER SH		3. o	35 60	5.08 10.15	3.66 11.66	6.09 11.86	2.32	2.57	1.83	2.36			
COMMON S		TST'G (MILL)	9. 6.	02	6.09	7.30	7.40	7.51	7.65	8.61	8.71			
AVG ANN'L	P/E RA			24.	2	20.3	21.5	20.1	16.4	18.2	22.5	18.3	23.2	19.3/NA	
AVG ANN'L	DIV'D	YIELD		1.	28 9%	3.1%	3.4%	4.1%	4.5%	4.1%	4.1%	3.8%			
SALES (\$MI	ILL)			45.	3	47.3	52.5	56.2	60.9	64.9	65.1	70.6		Bold figures	
DEPRECIAT	ION (\$	JIN MILL)		100.	0% 4	45.6%	45.6%	45.1%	46.9%	46.5%	<u>45.5%</u> 7.4	48.7%		are consensus earnings	
NET PROFIT	T (\$MÌL	.L)		5.	0	6.1	6.3	6.4	7.3	7.6	6.7	9.8		estimates	
NET PROFIT	X RATI T MAR(= GIN		39. 11.	9% 1%	39.0% 12.8%	39.8% 11.9%	40.8%	40.1%	40.0%	6 40.8% 6 10.4%	40.2% 14.0%		and, using the recent prices.	
WORKING C	CAP'L (\$MILL)		d1.	8	d8.8	2.5	d20.9	d23.3	d27.9	d11.4	d11.4		P/E ratios.	
LONG-TERN	M DEBT	「 (\$MILL)	.)	92. 57	4 8	92.1 61.8	91.8 85 1	107.6 87.8	106.0 91.2	105.1 95.1	106.5 113.0	106.3 118.2			
RETURN ON		L CAP'L	_	5.	3%	5.8%	5.3%	4.7%	5.2%	5.6%	6 4.6%	5.9%			
RETURN ON	N SHR.		1	8.	7% 7%	9.8%	7.4%	7.3%	8.0%	8.0%	6.0%	8.3%			
ALL DIV'DS	TO NE	T PROF	:	69%	/ /0	61%	71%	81%	74%	75%	92%	70%			
^A No. of analy	rsts char	nging earl	n. est. in la	ast 3 day	s: 0 up,	, 0 down, conse	nsus 5-year earr	nings growth not	available. ^B Ba	sed upon 3 an	alysts' estimates. C _E	Based upon 3 ar	nalysts' estimates		
	AN	NUAL R	ATES			ASSETS (\$m	nill.) 2	011 2012	9/30/13		INDU	STRY: Wa	ater Utility		
of change () Sales	per sha	are)	5 Yrs. 1.5%	1 7	Yr. .0%	Cash Assets Receivables		.3 .6 8.6 8.7	.6 8.8	BUSIN	ESS: Artesia	n Resource	es Corporati	on, through its	
"Cash Flow Earnings	"		3.0% 2.0%	24 36	.0% .0%	Inventory		1.5 1.4	1.6	subsidia	ries, provides	water, was	stewater, and	l other services	
Dividends Book Value			4.5%	4	.0%	Current Asse	ts 1	<u>2.9</u> <u>2.0</u> 3.3 13.5	14.7	on the D	elmarva Peni	nsula. It di	stributes and	d sells water to	
			4.3 /0		.5%	Property Pla	nt			custome	rs in Delawar	al, industr e. Marvlai	nd, and Pen	nsvlvania. The	
Year 1	IQ	2Q	3Q	4Q	Full Year	& Equip, a	it cost 43	5.0 454.4		company	y also offers	water for	r public an	d private fire	
12/31/11 14	4.8	16.5	17.7	16.1	65.1	Net Property	35	7.6 370.6	378.2	protectio	on to customer	rs in its ser	vice territori	es. In addition,	
12/31/12 16 12/31/13 16	6.7 6.3	17.9 17.8	19.0 18.1	17.0	70.6	Other Total Assets	37	<u>7.8</u> <u>7.6</u> 8.7 <u>391.7</u>	<u>7.5</u> 400.4	and sew	er service lir	ne protecti	on plans, a	nd wastewater	
12/31/14							(* 11)			manager	nent services,	as well as	s design, co	nstruction, and	
Fiscal	EAR	NINGS P	PER SHA	RE	Full	Accts Payabl	(\$mili.) e	2.8 3.5	3.7	engineer	ing services.	As of Dec	ember 31, 2	2012, the com-	
12/31/10 3	22	24	38	4Q	1 00	Debt Due Other	1	3.8 12.6 8.1 8.8	10.9 11.8	through	1,162 miles of	f transmiss	ion and dist	ribution mains.	
12/31/11 .1	14	.23	.26	.20	.83	Current Liab	2	4.7 24.9	26.4	Has 229	employees. C	hairman, C	C.E.O. & Pre	sident: Dian C.	
12/31/12 .2 12/31/13 1	28 19	.32 28	.33 29	.20 24	1.13					Taylor. A	Address: 664 (Churchman	is Rd., Newa	ark, DE 19702.	
12/31/14	20	.34	.20			LONG-TERM	DEBT AND E	QUITY		http://ww	ww.artesianwa	ter.com.	5-0900.	internet.	
Cal- Q	UARTE		VIDENDS	PAID	Full	as of 9/30	/13			1					
endar 1	10	2Q	30	4Q	Year	Total Debt \$ LT Debt \$10	116.6 mill. 5.7 mill.	Due in	5 Yrs. NA						
2011 .1	19	.19	.19	.203	.70	Including Ca	ip. Leases NA	(47	% of Cap'l)					J.V.	
2013 .2 2014 .2	203	.206	.206	.209	.82	Leases, Unc	apitalized Ann	ual rentals NA	· · · · · · · · /		J	anuary 17,	2014		
IN	ISTITU	τιοναι	DECISIO	NS	I	Pension Lial	cility \$.4 mill. in	'12 vs. \$.5 mill.	in '11	TOTAL					
	1	Q'13	2Q'13	30	2'13	Pfd Stock No	ne	Pfd Div'd	I Paid None	IUIAL	SHAKEHULD	Dividend	NN Is plus appreciat	ion as of 12/31/2013	
to Buy		32 26	31 30		30 27	Common Sto	ck 8,793,216 sh	ares		3 Mos.	6 Mos.	1 Yr.	3 Yrs	5 Yrs.	
Hld's(000)	3	036	3029	30	33			(53	3% of Cap'l)	4.10%	4.92%	6.13%	35.96%	6 76.91%	

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Exhibit No. Schedule PMA-8 Rebuttal **D** -7 . 6 . 7 /

																			гаус	1013	+
C 1		DNI	A W/)	_	R	ECENT	22 A	7 P/E	. 20	/ Traili	ng: 22.9	RELATIV	11		20	0/ V	'ALUI		
		NIN	A W		NYS	E-CWT	P	RICE	22.4	RATI	0 ZU. (Medi	an: 21.0 /	P/E RATI			J.U	//0	LINE		
TIMELIN	iess 3	Raised 1	1/1/13	High:	13.4	15.7	19.0	21.1	22.9	22.7	23.3	24.1	19.8	19.4	19.3	23.4			Target	Price	Range
SAFET	1 3	Lowered	7/27/07	LOW:		11.0	13.0	15.0	10.4	17.1	13.0	10.7	16.9	10.7	10.0	10.4			2016	2017	2018
TECHN		Daicod 1	/17/14	1. di	33 x Divide	ends p sh iterest Rate	. –														64
BETA .	60 (1.00 =	= Market)	/1//14	2-for-1 sr	elative Pric	e Strength															48
201	6-18 PR	OJECTI	ONS	Options:	Yes areas indi	cate recess	ions							2-for-1		<u></u>					32
	Prico	A Gain	nn'l Total									-					•				_24
High	35 (+55%)	15%	-					րորհուլ	111 IIII	الالالالي	ա _{րուն}	ակես		ստութ	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	-				-20 16
Low	25 (· r Decis	+10%) ions	7%	الأساليا	աստ	արդու	արթու				.,										12
manac	FMA	MJJ	ASO									•••									
to Buy	0200	0 0 0	0 1 0			•••••				_	•	•									-8
to Sell	0 0 0	0 0 0	0 0 0	° <u>° °</u> *** '	*****	•••,	·····	**************************************	*******	••••	••••							% тот	RETUR	N 12/13	-0
Institu	tional I	Decisio	ns		1					•••	<u>ار آر ا</u>		••••••••	• • • • • • • • • • • •	•••••				THIS V	L ARITH."	
to Buy	86	202013	5u2015 60	Percen shares	t 18 – 12 –					. 1111.1			. de La	La Lat.	hh.			1 yr.	29.7	38.4	-
to Sell HId's(000)	39 26409	57 26677	51 27841	traded	6 -	սուսին	ասհա	luuliu										3 yr. 5 yr.	36.8 16.9	52.8 211.8	-
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	© VALL	je line pi	JB. LLC 1	6-18
7.74	7.38	7.98	8.08	8.13	8.67	8.18	8.59	8.72	8.10	8.88	9.90	10.82	11.05	12.00	13.34	12.15	13.15	Revenue	s per sh		16.00
1.46	1.30	1.37	1.26	1.10	1.32	1.26	1.42	1.52	1.36	1.56	1.86	1.93	1.93	2.07	2.32	2.20	2.50	"Cash Fl	ow" per s	sh	2.85
.92	.73	.77	.66	.47	.63	.61	.73	.74	.67	.75	.95	.98	.91	.86	1.02	.95	1.15	Earnings	spersh /		1.40
1 20	.54	1.54	1.55	.56	.56	.56	.5/ 1 97	.5/	.58	.58	.59	.59	.60	.62 2 92	.63	.64 2 //5	.68 2 25	DIV'O De Can'l Sn	u a per s ending re	n ¤∎ arsh	.90
6.50	6 69	6.71	6 45	6.48	6.56	7.22	7.83	7.90	9.07	9.25	9.72	10.13	10.45	10.76	11 28	12.45	12.85	Book Va	lue per st		14.75
25.24	25.24	25.87	30.29	30.36	30.36	33.86	36.73	36.78	41.31	41.33	41.45	41.53	41.67	41.82	41.98	47.75	48.00	Commor	Shs Out	sťg D	50.0
12.6	17.8	17.8	19.6	27.1	19.8	22.1	20.1	24.9	29.2	26.1	19.8	19.7	20.3	21.3	17.9	21.6		Avg Ann	'I P/E Rat	io	22.0
.73	.93	1.01	1.27	1.39	1.08	1.26	1.06	1.33	1.58	1.39	1.19	1.31	1.29	1.34	1.14	1.44		Relative	P/E Ratio		1.45
4.6%	4.2%	4.0%	4.3%	4.4%	4.5%	4.2%	3.9%	3.1%	2.9%	3.0%	3.1%	3.1%	3.2%	3.4%	3.5%	3.1%		Avg Ann	'l Div'd Yi	eld	3.0%
CAPITA	L STRU	CTURE a	as of 9/30	0/13		277.1	315.6	320.7	334.7	367.1	410.3	449.4	460.4	501.8	560.0	580	630	Revenue	s (\$mill)	=	800
Total D	ebt \$489	.7 mill. I	Due in 5	Yrs \$65.3	mill.	19.4	26.0	27.2	25.6	31.2	39.8	40.6	37.7	36.1	42.6	45.0	55.0	Net Profi	t (\$mill)		70.0
LT Deb	\$430.2	mill. I	T Intere	st \$29.5 n	nill.	39.9%	39.6%	42.4%	37.4%	39.9%	37.7%	40.3%	39.5%	40.5%	37.5%	34.0%	39.0%	Income 1	ax Rate		39.0%
(LT inte	rest earn	ed: 6.7x;	total int.	cov.: 6.0x	() 	10.3%	3.2%	3.3%	10.6%	8.3%	8.0%	7.0%	4.2%	7.0%	8.0%	0.0%	8.5%	AFUDC 7	10 Net F	atio	10.0%
Pensio	1 Assets	-12/12 \$	4) 202 9 mil	2% of Ca	p'I)	49.1%	50.8%	40.3 %	43.3 % 55 9%	42.9%	58.4%	52.9%	47.6%	48.3%	52.2%	42.0%	44.0%	Common	Fauity R	atio	47.5% 52.5%
		, (Oblig. \$4	 02.9 mill.		498.4	565.9	568.1	670.1	674.9	690.4	794.9	914.7	931.5	908.2	1025	1100	Total Ca	oital (\$mi)	1400
Pfd Sto	ck None					759.5	800.3	862.7	941.5	1010.2	1112.4	1198.1	1294.3	1381.1	1457.1	1510	1565	Net Plan	t (\$mill)	'	1725
Commo	on Stock	47,739,	024 shs.			5.6%	6.1%	6.3%	5.2%	5.9%	7.1%	6.5%	5.5%	5.5%	6.3%	6.0%	6.5%	Return o	n Total C	ap'l	6.5%
as of 10)/31/13	,,				7.8%	8.9%	9.3%	6.8%	8.1%	9.9%	9.6%	8.6%	8.0%	9.0%	7.5%	9.0%	Return o	n Shr. Eq	uity	9.5%
MARKE	TCAP	\$1 1 hilli	on (Mid)	Can)		7.9%	9.0%	9.3%	6.8%	8.1%	9.9%	9.6%	8.6%	8.0%	9.0%	7.5%	9.0%	Return o	n Com Ed	uity	9.5%
CURRE	NT POS		2011	2012	9/30/13	01%	2.1%	Z.1%	1.0%	1.0%	3.0% 61%	3.0% 60%	3.0% 66%	2.3%	5.4% 62%	2.5%	3.5% 50%	All Div'de	to Com I	rof	3.3% 64%
(\$MI	LL.)		27.2	20.0	40.0	DUCIN	FSS . Co	lifornio M	lotor Son	ion Crow			od ond	brookdo	12/0	ragidantic			100/	hlia auth	orition
Other	sseis		27.2 86.7	38.8 107.8	48.8	nonreg	ulated w	ater serv	vater Serv	uahly 4	р ргочае 71.900 с	s regulat	in 83	4% ind	wn, rz: ustrial 4º	residentia %: other	al, 66%; i 8% '12	reported	deprecia	tion rate	2 8%
Current	Assets		113.9	146.6	170.6	commu	inities in	Californi	a, Washir	ngton, N	ew Mexic	o, and	Hawaii.	Has 1,1	31 empl	oyees. P	resident,	Chairma	in, and (Chief Exe	ecutive
Accts F	'ayable ue		48.9 53.7	46.8 136.3	60.4 59.5	Main s	ervice a	eas: Sar	Franciso	o Bay a	rea, Sac	ramento	Valley,	Officer:	Peter C.	Nelson.	Inc.: Dela	aware. Ac	dress: 1	720 Nort	h First
Other		_	49.3	59.7	77.1	Salinas	Rio Gra	San Joa nde Cor	aquin vaii n: West	ey & pa Hawaii l	Itilities (9/08) R	es. Ac-	Street, 8200 In	San Jos ternet: w	se, Califo ww.calwa	ornia 95 ateraroun	112-4598 0 com	. Telepr	one: 40	8-367-
Fix Ch	Liab.		151.9 278%	242.8	197.0 325%	A G			p, noor					0200.1	Comr			uld he	ovon	mono	im
	9.000.	S Past	Pa	st Fet'd	1'10-'12	Wat	nai a er Se	green rvice	Grou	etwe In ar	en C nd sta	allioi nte ra	ma som-	year.	ive if	f 201	lis wo R's re	uia pe sults	were	not	hol-
of change	(per sh)	10 Yrs	. 5 Ÿ	rs. to	16-118	lato	rs is	all bu	it fina	alized	I. Las	t qua	rter.	stere	d by a	\$0.09)-a-sh	are ta	x brea	ak.	501
Revenu "Cash	ies Flow"	4.0)% 7. % 7	.0% 5%	4.5% 5.0%	the	Califo	rnia F	Public	Utilit	y Con	ımissi	ion's	Calif	fornia	a Wat	er's	next	divid	lend	an-
Earning	ļs	5.0	% 5	.5%	7.0%	(CPU	JC) (Office	of R	atepa	yers	Advoc	ates	nour	iceme	ent co	ould	breal	c a lo	ong-te	erm
Book V	alue	5.0	v‰ 1.)% 4.	.5%	0.0% 5.5%		an reac	nounc	ea th	at a	settle	ment	nas	tren the c	a. Uv	er the	e pas	t five	and	10 ye	ars,
Cal-	QUAR	TERLY RF	VENUES (\$ mill.)⋿	Full	CPI		esn't l	have t	e นนไ กิฮก	along	with	the	1.5%	resn	i payo ective	lv le	s gruv vels t	hat v	1.070 vere 9	sub-
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	ORA	's dec	ision.	the ch	ances	of th	at ap	pear	stant	ially	below	that	of the	avera	age w	ater
2010	90.3	118.3	146.3	105.5	460.4	to be	virtu	ally n	il.		-		- _	utilit	y. <u></u> We	estir	nate	that y	when	the :	new
2011	98.1	131.4	169.3	103.0	501.8	The	deal	app	ears	to_be	e fair	to l	ooth	divid	end is	s anno	unce	i in th	e firs	t qua	rter,
2012	1110.0	143.0 154.6	170.1 184.4	121.5 129.6	580		torni		ter a	nd i	ts cu	stom	ers.	the h	ike ca	n be a	anywł b owi	nere fr	om 69	% to 9	%.
2014	130	160	200	140	630	HCC0	t Cal	iforni	ne ter a Wat₄	nns 0 ar wil	n une Ibe ⊲	arra awolle	nge- d to	form	e SIL	ares of late	nave The	broa	i sure d mai	ving] •ket a	ver-
Cal-	E/	RNINGS I	PER SHAR	ΕA	Full	incre	ease i	ts gro	ss rev	enues	by S4	45 mi	llion	ages	rose	shar	ply in	n last	year	's fo	urth
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	in 20)14, \$	10 mi	illion i	n 201	5, an	d \$10	mil-	quart	er. N	Not s	urpris	singly,	cons	ervat	ive,
2010	.05	.25	.49	.12	.91	lion	in 20	16. Iı	1 retu	rn, th	ne uti	lity w	ould	incon	ne-orio	ented	wa	ter	utility	st	ocks
2011	.03 03	.29	.50 56	.04 12	.86 1 02	be re	quire	d to i	nvest	\$321 1	millio	n in w	ater	lagge	d. Th	at is,	all t	out Ca	aliforr	na W	ater
2013	d.03	.28	.61	.09	.95	Syste 2013	201 IN	mastr Mor	eover	unpi shoul	uvem d the	utility	rom		view	on (ers. Califo	rnia	Wata	r cha	TAS
2014	.05	.35	.60	.15	1.15	vest	ana	dditio	nal \$1	26 m	illion	it w	ould	has	chan	ged f	or th	ie bei	ter.	Assun	ning
Cal-	QUAR	TERLY DI	IDENDS P	AID ^B =	Full	be g	rante	d ano	ther \$	19 m	illion	rate	hike	state	reg	ulator	s ren	nain f	air v	hen	the
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	ata	later	date.	The	CPUC	is e	xpecte	ed to	utilit	y see	ks hig	gher 1	rates	in thi	ree_ye	ears,
2010	.149	.149	.149	.149	.60	relea	se its	decis	ion ea	rly th	is yea	r.	14	we th	ink t	hat th	ie sto	ck, wł	ich h	as be	en a
2011	1575	.154 1575	.154 1575	.154 1575	.62	te "	expec	t the	com	pany in 🤊	S DOU	tom	une tho	majo	r und	er per	TORM	er ove	r the	past d tur	one-
2012	.16	.1575	.1575	.16	.63	impl	emen	uu III tation	of hi	un 20 Sher	rates	we ti	hink	solid	- and total	nve-y returr	is thr	ough \$	5, coui 2016-9	u tur 2018	
2014		-	-	-		Cali	fornia	's sha	re ne	t can	rise	21%	this	Jame	es A. I	Flood		J	anuar	y 17,	2014
	FPS F	xcl norr	ecurring	nain (loss). May	Aug		Div'd ro	investmen	t nlan la	(D) In mil	lione adi	iustad for	r splite		Con	nnanv'e	Financia	Stronge	, ., h	- B++
200 (14)	'01 2a	102 14.	11 10 N	Jovt oorn	, widy	, nuy., ai loblo	IG 110V.	Divuie	el	- pian		doc non	roa rov	opino.		Sto.	npany S ok'o Drio	- manula	. Jacingt		100

(A) Basic EPS. Excl. nonrecurring gain (loss):	May, Aug., and Nov. Div'd reinvestment plan	(D) In millions, adjusted for splits.	Company's Financial Strength	B++
'00, (4¢); '01, 2¢; '02, 4¢; '11, 4¢. Next earn-	available.	(E) Excludes non-reg. rev.	Stock's Price Stability	100
ings report due mid-February.	(C) Incl. intangible assets. In '12: \$18.8 mill.,		Price Growth Persistence	50
(B) Dividends historically paid in late Feb.,	\$0.44/sh.		Earnings Predictability	90
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			_									-							Page	0013	4		
	NNE	CTIC	CUT	WAT		IDQ-CT	WS P	ecent Rice	35.0	9 P/E RATIO	19.	6 (Traili Medi	ng: 21.3 an: 23.0)	RELATIV P/E RATI	5 1.0	5 DIV'D YLD	2.8	8%	LINE				
TIMELI	VESS $\frac{2}{2}$	Raised 1	2/13/13	High: Low:	31.1 20.3	30.4 24.0	29.8 23.8	28.2 21.9	27.7 20.3	25.6 22.4	29.0 19.3	26.4 17.3	27.9 20.0	29.1 23.3	32.8 26.2	36.4 27.8			Target 2016	Price 2017	Range 2018		
TECHNICAL 3 Lowered 12/27/13					NDS 30 x Divide vided bv In	ends p sh terest Rate	. –			_											80		
BETA .	75 (1.00 =	Market)	12121113	3-for-2 sp	elative Pric plit 9/01	e Strength				_					\frown						-60 50		
201	6-18 PR	OJECTIO	ONS nn'i Total	Shaded	No areas indi	cate reces	sions			_							•				40		
High	Price 45 (+	Gain ⊦30%)	Return 9%			Letter TH	 	Lu _{tt} illigu	ullum .					, ₁₁ ,,,,111 1	H.,,PUH	······	-				30 25		
Low Inside	30 `(r Decisi	-15%) ions	Nil						1		<u> </u>	արտու,	ur I'll.								20 15		
to Buy	FMA	MJJ	A S O		·····	******					.*•	•									10		
Options to Sell	0 0 0 0 0 0			•				**********	••••	_	***							% TOT		 N 12/12	_7.5		
Institutional Decisions										*********		****	********	•••••	••••••	••••••••	,	<i>7</i> 0 101	THIS V STOCK	L ARITH.*			
to Buy to Sell	52 21	39 39	42 31	shares	t 12 - 8 - 4 -													1 yr. 3 yr.	23.1 40.7	38.4 52.8	E		
Hid's(000)	4336 1998	4492 1999	4509 2000	2001	2002	2003	2004	2005	2006	<u>101111111</u> 2007	<u>1</u> 2008	2009	2010	111111111 2011	2012	2013	2014	5 yr. © VALI	80.3 Je line Pi	211.8 JB. LLC	16-18		
5.67	5.58	5.87	5.70	5.93	5.77	5.91	6.04	5.81	5.68	7.05	7.24	6.93	7.65	7.93	7.63	8.65	8.90	Revenue	s per sh		11.25		
1.51	1.59	1.65	1.73	1.78	1.78	1.89	1.91	1.62	1.52 81	1.90 1.05	1.95 1 11	1.93	2.04	2.11	2.10	2.55 1.65	2.65 1.75	5 "Cash Flow" per sh 5 Earnings per sh A		sh N	2.75 1.85		
.77	.78	.79	.79	.80	.81	.83	.84	.85	.86	.87	.88	.90	.92	.94	.96	.98	1.01	Div'd De	cl'd per s	h ^B ∎	1.12		
1.99	1.12 8.52	1.42 8.61	1.43	1.86 9.25	1.98	1.49 10.46	1.58	1.96 11.52	1.96 11.60	2.24 11.95	2.44 12.23	3.28 12.67	3.06	2.61	2.34	2.75 17.55	2.85 17.80	Cap'l Sp Book Va	ending pe lue per st	ersh ∖D	2.90 20.40		
6.79	6.80	7.26	7.28	7.65	7.94	7.97	8.04	8.17	8.27	8.38	8.46	8.57	8.68	8.76	10.97	11.10	11.25	Commo	n Shs Out	sťg ^C	12.00		
12.9	15.5	18.2	18.2	21.5	24.3	23.5 1.34	1.21	28.6	29.0 1.57	23.0 1.22	22.2 1.34	18.4 1.23	1.32	23.0	19.4 1.24	18.5 1.03		Avg Ann Relative	P/E Ratio	10	20.0 1.35		
6.0%	4.9%	4.2%	4.0%	3.3%	3.0%	3.0%	3.1%	3.4%	3.6%	3.6%	3.6%	4.1%	3.9%	3.6%	3.2%	3.2%		Avg Ann	'l Div'd Yi	ield	3.4%		
CAPITAL STRUCTURE as of 9/30/13 Total Debt \$180.9 mill Due in 5 Yrs \$14.8 mill						47.1 9.2	48.5	47.5	46.9 6.7	59.0 8.8	61.3 9.4	59.4 10.2	66.4 9.8	69.4 9.9	83.8 13.6	95.0 18.0	100 19.5	Revenue	es (\$mill) it (\$mill)		135 22 0		
LT Debt \$175.5 mill. LT Interest \$7.6 mill.						17.9%	22.9%		23.5%	32.4%	27.2%	19.5%	35.2%	41.3%	32.0%	32.0%	33.0%	Income	Fax Rate		35.0%		
Loosos	Unconi	alizad:		(49% o	f Cap'l)	43.5%	42.8%	44.9%	 44 4%	47.8%	1.7%		49.5%	1.8%	1.7%	2.0%	2.0%	AFUDC	% to Net F	Profit	3.0%		
Pensio	n Assets	\$45.4 m	ill.	niais φ.2 1		55.9%	56.7%	54.6%	55.1%	51.8%	52.7%	49.1%	50.2%	46.5%	50.8%	50.5%	50.5%	Common	Equity F	latio	51.5%		
			50 Joiig. 50	6.5 MIII.		148.9 238.9	155.1 246.1	172.3 247.7	174.1 268.1	193.2 284.3	196.5 302.3	221.3 325.2	225.6	254.2	364.6 447.9	370 465	395 490	Total Ca Net Plan	pital (\$mi t (\$mill)	II)	475 550		
Pfd Sto	ck \$0.8 r	nill. I	Pfd Divd	NMF		7.5%	7.0%	5.0%	4.9%	5.5%	5.9%	5.5%	5.4%	4.9%	4.8%	6.0%	6.0%	Return o	n Total C	ap'l	5.5%		
Common Stock 11,018,161 shs. as of 10/31/13						10.9% 11.0%	10.6%	7.5% 7.6%	6.9% 7.0%	8.7% 8.7%	9.0% 9.1%	9.3% 9.4%	8.6%	8.3%	7.3%	9.5% 9.5%	9.5% 9.5%	Return o Return o	n Shr. Eq n Com Ec	uity quity	9.0% 9.0%		
MARKET CAP: \$375 million (Small Cap)						3.2%	3.1%	.3%	NMF	1.6%	1.9%	2.3%	1.6%	1.4%	2.7%	4.0%	3.5%	Retained	to Com I	Ēq	3.0%		
(\$MILL) Cash Assets 10 132 16							71%	95%	105% t Water 9	82%	79%	/6%	81%	Maine	62%	59% The Ma	58%		12: Bidd	oford an	61%		
Accounts Receivable 14.9 11.5 14.3 Other 3.0 11.7 31.3						holding company, whose income is derived from earnings of its								Water, 12/12. Inc.: CT. Has about 260 employees. Chair- man/Resident/CEO: Eric Wit Themping Official and Jack									
Current Assets 18.9 36.4 47.2						largest subsidiary, Connecticut Water, accounted for about 85% of								2.2% of the common stock; BlackRock, Inc. 6.7%; The Vanguard									
Debt Due 3.0 5.4 Other 23.2 29 65							the holding company's net income in 2012, and provides water services to 400,000 people in 55 towns throughout Connecticut and								Group, 5.3% (4/13 proxy). Address: 93 West Main Street, Clinton, CT 06413. Telephone: (860) 669-8636. Internet: www.ctwater.com.								
Current Liab. 30.4 15.9 19.3							Connecticut Water Service is con-								utilities it oversees. For example, last year								
ANNUA	Pa	st Est'd	solidating its operations in Maine. In 2012, the company acquired The Maine								the company was permitted to keep the benefits from an IRS refund in exchange												
or change (per sh) 10 Yrs. 5 Yrs. to '16-'18 Revenues 3.5% 6.0% 6.5%							Water Co. and Biddeford and Saco Water.								for lowering rates and agreeing not to seek								
"Cash Earning	% 6. % 6.	0% 5%	4.5% 6.5%	head, specifically resources spent on regu-									We are raising our earnings estimates										
Book Value 5.5% 6.5% 6.0%							latory matters. Moreover, now that it has established a presence in the state future								for the utility. Despite fourth quarter's results probably being flat we think that								
Cal-	EVENUES (\$ mill.)	Full	tuck in acquisitions there seem likely.								Connecticut Water's share net rose 8% to											
2010	2010 13.8 15.9 21.0 15.7 66.4						The utility is also expanding on its home turf. Agreements have been								\$1.65 in 2013, versus 2012's strong show- ing. For 2014, combining the utility's								
2011 16.0 17.4 20.6 15.4 69. 2012 18.5 21.3 24.5 19.5 83.						reached to expand pipelines to supply								growing rate base with the advantages al-									
2013 21.5 22.5 29.6 21.4 95.1 2014 22.0 24.0 30.0 24.0 400					the main campus of the University of Con-								rise 6% to \$1.75.										
Cal- EARNINGS PER SHARE A Full						necticut, which is the equivalent of a small									Dividend growth is still below aver-								
endar	endar Mar.31 Jun. 30 Sep. 30 Dec. 31 Year 2010 12 27 54 20 412						Auuit	101101	mei ge	15 010	hinn	ane	decade, the company has not had a good										
2010	011 .26 .37 .39 .11 1.13						Less onerous regulation augurs well for Connecticut Water. One of the key									dividend-paying record compared to its peers. This is a trend that should continue							
2012	2012 .22 .47 .67 .16 1.53 2013 .24 .39 .86 .16 1.65						factors in analyzing a utility is how fair is									for the foreseeable future due to the							
2014 .30 .47 .73 .25 1.75						the Hist	Historically, Connecticut's Public Regu-									projected sharp rise in Connecticut Water's capital spending program.							
Cal- QUARTERLT DIVIDENDS PAID ^B Full endar Mar.31 Jun.30 Sep.30 Dec.31 Year						lator	latory Authority (PURA) hasn't had a good								These share are ranked to outperform								
2010 .228 .228 .233 .233 .927 2011 .233 .233 .238 .238 .947						conditions in the state as Below Average.								to the stock's recent strength, much of its									
2012 .238 .238 .2425 .2					.942	In t	In the recent past, however, PURA appears to be striking a better balance be-						appeal over the next three-to five-year pe- riod has been diminished.										
2013 2014	.2425	.2425	.2475	.2475	.98	twee	tween the interests of the public and the									James A. Flood January 17, 2014							

(A) Diluted earnings. Next earnings report due mid-February. Quarterly earnings do no add in vestment plan available.
 '12 due to rounding.
 (B) Dividends historically paid in mid-March, (D) Includes intangibles. In '12: \$31.7 mil © 2014 Value Line Publishing LLC. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind.
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Company's Financial Strength Stock's Price Stability Price Growth Persistence Earnings Predictability B+ 90 45 85

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Exhibit No. Schedule PMA-8 Rebuttal

																			Page	9 of 3	4
MIC)DLE	SE)	(WA	TER	NDQ-I	MSEX	RI P	ecent Rice	20.80) P/E Ratio	• 21. •	4 (Traili Medi	ing: 20.6 an: 22.0)	RELATIV P/E RATI	1.1	5 div'd Yld	3.7	′%	/ALUI LINE	Ξ	
TIMELI	VESS 3	Lowered	11/15/13	High: Low:	20.0 13.7	21.2 15.8	21.8 16.7	23.5 17.1	20.5 16.5	20.2 16.9	19.8 12.0	17.9 11.6	19.3 14.7	19.4 16.5	19.6 17.5	22.5 18.6			Target 2016	Price 2017	Range 2018
SAFET	r 2	New 10/2	1/11	LEGE	NDS 20 x Divide	ends p sh				_											64
	ICAL 3	 Lowered Market) 	1/17/14	01/ Re	elative Pric	e Strength	; 								\sim						- 48
201	6-18 PR		ONS	4-for-3 sp	olit 1702 olit 11/03											····					-40 -32
	Prico	A	nn'l Total	Shaded	areas indi	cate recess	sions	6.0													24
High	25 (+	⊷20%)	8%	ս վաս			^{µµµ} ^µ hµµ	m ^{ull} ll	աստություն	۱۳۳۲	he hum	U 1	իսկոս ^մ	ասեր	ստուհ	mmu IIIIII	•				20 16
LOW	20 r Decisi	(-5%) ions	3%		- Il mil							վիհու,									12
	FMA	MJJ	ASO			•••••															0
to Buy Options	0000	0 1 0 0 0	1 0 0 0 0	******	•		**************************************					•••									6
to Sell	000 tional [001 Decisio	200 1 S	-							*******	·•••,,••						% TOT		N 12/13	
to Duri	1Q2013	2Q2013	3Q2013	Percen	t 12 -					_			• •	*****	********	**********		1 vr	STOCK	INDEX 38.4	_
to Buy to Sell	38	37	42 29	shares traded	8 - 4 -		<u> </u>	htt.:							libitan ti	ulutet.		3 yr.	28.2	52.8	E
Hid's(000)	6579 1998	6489 1999	2000	2001	2002	2003	2004	2005	2006	<u>111111111</u> 2007	2008	2009	2010	2011	2012	2013	2014	© VALI	JE LINE P	JB. LLC 1	6-18
4.72	4.39	5.35	5.39	5.87	5.98	6.12	6.25	6.44	6.16	6.50	6.79	6.75	6.60	6.50	6.98	7.20	7.70	Revenue	es per sh		9.10
1.02	1.02	1.19	.99	1.18	1.20	1.15	1.28	1.33	1.33	1.49	1.53	1.40	1.55	1.46	1.56	1.75	1.85	"Cash F	low" per	sh	2.30
.67	.71	.76	.51	.66	.73	.61	.73	.71	.82	.87	.89	.72	.96	.84	.90	1.00	1.05	Earning	s per sh 4	A L B-	1.15
1.20	2.68	2.33	1.32	1.25	1.59	1.87	2.54	.07	2.31	1.66	2.12	1.49	1.90	1.50	1.36	./5 1.50	1.65	Cap'l Sp	endina p	n ⊡∎ ersh	2.00
6.00	6.80	6.95	6.98	7.11	7.39	7.60	8.02	8.26	9.52	10.05	10.03	10.33	11.13	11.27	11.48	11.70	12.10	Book Va	lue per si	D	12.90
8.54	9.82	10.00	10.11	10.17	10.36	10.48	11.36	11.58	13.17	13.25	13.40	13.52	15.57	15.70	15.82	16.00	16.25	Commo	n Shs Out	st'g ^C	17.00
13.4	15.2	17.6	28.7	24.6	23.5	30.0	26.4	27.4	22.7	21.6	19.8	21.0	17.8	21.7	20.8	20.3		Avg Ann Polativo	P/E Rat	io	20.0
6.3%	5.4%	4.4%	4.2%	3.8%	3.7%	3.5%	3.4%	3.5%	3.7%	3.7%	4.0%	4.7%	4.2%	4.0%	4.0%	3.7%		Avg Ann	'l Div'd Y	ield	3.6%
CAPITA	L STRU	CTURE a	s of 9/30)/13		64.1	71.0	74.6	81.1	86.1	91.0	91.2	102.7	102.1	110.4	115	125	Revenue	es (\$mill)		155
Total D	ebt \$166	.4 mill. [Due in 5	Yrs \$60.0	mill.	6.6	8.4	8.5	10.0	11.8	12.2	10.0	14.3	13.4	14.4	16.0	17.0	Net Prof	it (\$mill)		20.0
(LT inte	rest cove	rage: 4.1	x)	51 \$7.0 m		32.8%	31.1%	27.6%	33.4%	32.6%	33.2%	34.1%	32.1%	32.7%	33.9%	34.0%	34.0%	Income	Tax Rate		34.0%
		-		(41% 0	f Cap'l)	53.8%	53.8%	55.3%	49.5%	49.0%	45.6%	46.6%	0.8% 43.1%	42.3%	3.4% 41.5%	4.5%	4.5%	AFUDC	% to Net P rm Deht F	atio	5.0% 43.0%
Pensio	n Assets	-12/12 \$:	37.9 mill.			44.0%	42.5%	41.3%	47.5%	49.6%	51.8%	52.1%	55.8%	56.6%	57.4%	57.5%	57.0%	Common	n Equity F	latio	57.0%
Pfd Sto	ck \$2.0 r	(nill Pfd I	Divid: \$6	2.8 mill. mill		181.1	214.5	231.7	264.0	268.8	259.4	267.9	310.5	312.5	316.5	325	345	Total Ca	pital (\$mi	ll)	400
11000	σκ φ2.5 1		στν α. φ. ι			230.9	262.9	288.0	317.1	333.9 5.6%	366.3	376.5	405.9	422.2	435.2	445 6.0%	450	Net Plan	t (\$mill) n Total C	an'l	510 5.5%
Commo	on Stock 0/31/13	15,919,9	74 shs.			7.9%	8.5%	8.2%	7.5%	8.6%	8.6%	7.0%	8.1%	7.5%	7.8%	8.5%	8.5%	Return o	n Shr. Eq	uity	9.0%
MARKET CAP: \$325 million (Small Cap)						8.0%	9.0%	8.6%	7.8%	8.7%	8.9%	7.0%	8.2%	7.5%	7.8%	8.5%	8.5%	Return o	n Com E	quity	9.0%
CURRENT POSITION 2011 2012 9/30/13						NMF	.9%	.6% 0/%	1.3%	1.8% 70%	2.0%	.1%	2.1%	1.0%	1.4%	2.0%	2.5% 73%	Retained	I to Com I s to Net F	Eq	3.0% 70%
(\$MI	LL.)		3.1	3.0	3.0	BUSIN	ESS: Mir	dlesev \	Nater Con				nershin	2012 #	o Middle		am 2000		r 65% of	total rev	
Other		_	19.8	21.6	24.3	and op	eration of	f regulate	ed water u	tility syst	tems in N	lew Jers	ey, Del-	At 12/3	1/12, the	compan	y had 2	79 emplo	yees. In	corporate	ed: NJ.
Accts F	t Assets Pavable		22.9	24.6 3.8	27.3	aware,	and Per	nnsylvani	a. It also	operate	s water	and was	tewater	Preside	nt, CEO,	and Cha	airman: [Dennis W	. Doll. C	fficers/di	rectors
Debt D	ue		4.6	11.1	35.8	NJ and	DE. Its I	Middlese	k System p	provides	water se	rvices to	60,000	Group,	5.7% (4/	13 proxy)	. Addres	is: 1500	Ronson F	Road, Ise	elin, NJ
Curren	t Liab.		46.7	56.0	52.3	retail o	ustomers	s, primar	ily in Mid	dlesex	County,	New Jer	sey. in	08830.	Tel.: 732-	-634-1500). Interne	et: www.n	niddlesex	water.co	m.
Fix. Ch	g. Cov.	3	80%	410%	415%	Mid	dlese	x Wa	ater's	rec	ent	divid	end	New	Jers	ey la	psed.	Toge	ther	both	ac-
of chang	e (per sh)	10 Yrs.	5 Yi	rs. to	16-12	The	comp:	any ir	icrease	d its	payo	it by	only	Mea	nwhil	le, re	guest	ts for	high	event	ates.
Cash	ues Flow''	1.5 3.0	%1. %2.	0% 0%	5.5% 7.0%	1.3%	, vers	us th	e indu	stry	avera	ge of	over	have	rece	ently	been	filed	I. Tw	o of l	Mid-
Earning Divider	gs ids	3.5 1.5	%2. %1.	5% 5%	4.0% 1.5%	5%. grow	Moree	over, te of t	tnis re he nin	eprese e wat	ents t ter uti	ne io lities	west that	in D	xs su elawa	re an	d Ne	petitio w .Jer	nea r sev s	eguia eekin	tors g to
Book V	alue	4.5	% 4.	0%	2.0%	Valu	e Lin	e cov	ers. It	was	also	the	11th	recover costs used to repair and upgrade							
Cal-	QUAR	TERLY RE	VENUES (Sen 30	\$ mill.) Dec 31	Full	strai	ight ye	ear in	which	the	annua	l incr	rease	its water systems. If approved, rates							ates
2010	21.6	26.5	29.6	25.0	102.7	Lon	g-teri	n div	a share ridend	e. grov	wth n	rosp	ects	tivel	7. Verv	/ favoi	rable	ruling	s wou	ld pro	ba-
2011	24.0	26.1	28.7	23.3	102.1	are	also	belov	v avei	rage.	Over	the	next	bly n	iake o	ur ea	rning	s estir	nates	conse	rva-
2012	23.5	27.4 29.1	32.3 31.3	27.1 27.6	110.4 115	thre	e- to	five-y	ear pe	eriod,	we e	expect	the	tive t	hroug	sh 201	6-201	8. ling	nrog	om	hac
2014	30.0	30.0	35.0	30.0	125	rang	iy Tal	ch of	this is	a re	sult o	f the	com-	been	incr	eased	i. Th	e com	pany	plans	s on
Cal-	EA Mar 24	RNINGS F	ER SHAR	EA Dec 21	Full	pany	/s hig	h div	idend	payo	ut rat	io, w	hich	spen	ding §	575 m	illion	over	ther	ext t	hree
2010	11	31	37	.17	96	prov This	iaes l	lttle	room i he rea	or fu son	uture why	increa Middl	ases. lesex	years	5 TO I THIRE	upgrae Most	ue an	ia exj ne fiir	pand ids w	its ir ill be	irra-
2011	.17	.23	.32	.12	.84	spor	tsad	urren	t divid	dend	yield	that	is a	veste	d in	the re	esiden	tial s	ector,	whic	h is
2012	.11 20	.23	.38 36	.17 16	.90	full	percer	ntage	point l	nighe	r thar	the	typi-	more	pred	ictable	e and	carri	es hig	gher 1	nar-
2013	.17	.20	.30	.20	1.05	cal v	vater	utility nium	y. (Invo and ac	estors	s are a low	willin er vie	ld in	gins	than ents c	the c	omme husin	ercial	and	indus	trial
Cal-	QUAR	Terly DI\	IDENDS P	AID ^B ∎	Full	retu	rn for	the p	otentia	al of l	arger	divid	ends	We	would	d adv	vise	inves	tors	to st	teer
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	in th	ie futu	ire.)	L	L */			h	clear	r of t	his st	ock	for th	ne tin	1e be	ing.
2010	.180	.180 .183	.180 .183	.183 .185	.72	luck	uiese: (in tl	x nas he co	deen mmer	nit v cial s	and in	some ndusi	bad trial	how	gain	compa	anys ent t	earni ractio	ngs c	an so suppo	me- rt a
2012	.185	.185	.185	.1875	.74	mar	kets.	Last	year, a	larg	e Hes	s refi	nery	loftie	r div	idend,	the	re are	e moi	e wo	orth-
2013	.18/5	.18/5	.18/5	.19	./53	was	shutt	ered.	In ad	ditior	i, a n	najor	con-	while	e selec	tions	in the	wate	r utili	ty gro	2011
1	1				1	uad	. ເບ ຣບ	'ppry	water	ual	arget	νυιυμβ	511 111	Jaille	. л. 1	1000		J	unual	y 11,	~U14

(A) Diluted earnings. May not sum due to plan available.
 (B) Dividends historically paid in mid-Feb.,
 (C) In millions, adjusted for splits.
 (D) Intangible assets in 2012: \$9.2 million,
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SJV	V CC)RP.	NYSE	SJW			R P	ecent Rice	29.1	5 P/E RATI	o 23. '	1 (Traili Medi	ng: 24.5) an: 23.0)	RELATIV P/E RATI	5 1.2	4 ^{DIV'D} YLD	2.6	%	ALU LINE	Ξ	
TIMELIN	vess 3	Lowered	11/8/13	High: Low:	15.1 12.7	15.0 12.6	19.6 14.6	27.8 16.1	45.3 21.2	43.0 27.7	35.1 20.0	30.4 18.2	28.2 21.6	26.8 20.9	26.9 22.6	30.1 24.5			Targe	Price	Range
SAFET	/ 3	New 4/22	/11	LEGE	NDS 50 x Divide	ends p sh						_							2010	2017	2010
TECHN		Raised 1	/3/14	div •••• Re	vided by In elative Pric	terest Rate e Strength															
BETA .8	35 (1.00 = 6-18 PR	Market) O.IFCTIC	NS	3-for-1 sp 2-for-1 sp	olit 3/04 olit 3/06										\langle	· · · ·					50
	Price	Gain	nn'l Total	Shaded	areas indi	cate reces	sions		ا _{ال}	htt _{ull} ul											
High	40 (+	+35%) (±5%)	11%	-				երկիս	μημ ^{η.}				<mark>լ, Ալլլոս</mark>	ոսորո	mtt l	ուսուս	-				
Inside	r Decis	ions	470	4			ի իրով	11111				1.1									15
to Buy	F M A 0 0 0	M J J 0 0 0	A S O 0 0 0	100040	To lunit.	0,1000						•									10
Options to Sell	0 0 0 0 0 0	0 0 0 0 0 0	1 0 0 1 0 0			••••		·····		·	•••••	•••						₩ TOT		N 12/12	_7.5
Institu	tional D	Decisio	15	••••	••••	····	• ^{-•} • _• •••••	••••		1.		****	*********		******			% 101	THIS N	L ARITH.*	
to Buy	46	47	43	Percen shares	t 15 – 10 –													1 yr. 3 yr	15.1	38.4	E I
to Sell Hid's(000)	10000	10629	10697	traded	5 -	سيلاس	سيريايا	սողիրո					hantiiliilii	սկկկին	սլլլու	ողիրողո		5 yr.	14.9	211.8	
1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	11.05	12 12	11.69	2010	12 05	2012	2013	2014	© VALU	JE LINE P	JB. LLC	16-18
1.27	1.26	1.43	1.23	1.43	1.55	1.75	1.89	2.21	2.38	2.30	2.44	2.21	2.38	2.80	2.97	3.25	3.50	"Cash F	ow" per	sh	3.65
.80	.76	.87	.58	.77	.78	.91	.87	1.12	1.19	1.04	1.08	.81	.84	1.11	1.18	1.20	1.40	Earnings	s per sh	A	1.60
.38	.39	.40	.41	.43	.46	.49	.51	2.83	.57	.61	.65	.66	.68	.69	.71	.73	.75	Div'd De Can'l Sn	cl'd per s ending n	h ^B ∎ ersh	.90
7.02	7.53	7.88	7.90	8.17	8.40	9.11	10.11	10.72	12.48	12.90	13.99	13.66	13.75	14.20	14.71	15.40	16.40	Book Va	lue per sl	1	19.15
19.02	19.01	18.27	18.27	18.27	18.27	18.27	18.27	18.27	18.28	18.36	18.18	18.50	18.55	18.59	18.67	20.25	21.00	Common	n Shs Ou	st'g ^C	23.00
11.2	13.1	15.5	2 15	18.5	94	15.4 88	19.6	19.7	23.5 1.27	33.4	26.2	28.7	29.1	21.2	20.4	22.7		Avg Ann Relative	P/E Ratio	10	22.0 1.45
4.3%	3.9%	3.0%	2.1%	3.0%	3.4%	3.5%	3.0%	2.4%	2.0%	1.7%	2.3%	2.8%	2.8%	2.9%	3.0%	2.7%		Avg Ann	'l Div'd Y	ield	2.6%
CAPITA	L STRU	CTURE a	is of 9/30	/13		149.7	166.9	180.1	189.2	206.6	220.3	216.1	215.6	239.0	261.5	275	310	Revenue	es (\$mill)		375
LT Deb	ebt \$335 t \$335.1 i	.1 mill. L mill. L	T Interes	rrs \$21.2 st \$18.6 n	' mill. nill.	36.2%	16.0	20.7	22.2	19.3	20.2	15.2	15.8	20.9	22.3	26.0	29.0	Net Prof	it (\$mill) Fax Rate		37.0
(Total ir	iterest co	verage: 4	1.6x)	(51% o	f Cap'l)	1.6%	2.1%	1.6%	2.1%	2.7%	2.3%	2.0%		2.0%	2.0%	3.0%	4.0%	AFUDC 9	% to Net I	Profit	5.0%
Leases	, Uncapi	talized: /	Annual re	ntals \$4.7	7 mill.	45.6%	43.7%	42.6%	41.8%	47.7%	46.0%	49.4%	53.7%	56.6%	55.0%	54.5%	54.0%	Long-Ter	rm Debt F	Ratio	51.0%
Pensio	n Assets	\$75.5 m	nill.			306.0	328.3	341.2	391.8	453.2	54.0% 470.9	499.6	46.3%	43.4% 607.9	45.0%	45.5%	40.0%	Total Ca	pital (\$mi	(atio	49.0% 900
Pfd Sto	ck None	(Oblig. \$1	41.0 mill.		428.5	456.8	484.8	541.7	645.5	684.2	718.5	785.5	756.2	831.6	890	950	Net Plan	t (\$mill)	.,	1150
Common Stock 20.162.133 shs.						6.9%	6.5%	7.6%	7.0%	5.7% 8.2%	5.8%	4.4%	4.3%	4.9%	5.0% 8.1%	5.0%	5.0%	Return o	n Total C	ap'l	6.0% 8.5%
Common Stock 20,162,133 shs. as of 10/25/13						10.0%	8.7%	10.6%	9.7%	8.2%	8.0%	6.0%	6.2%	7.9%	8.1%	8.5%	8.5%	Return o	n Com E	quity	8.5%
MARKET CAP: \$600 million (Small Cap)						4.7%	3.6%	5.6%	5.2%	3.5%	3.3%	1.2%	1.2%	3.1%	3.3%	3.5%	4.0%	Retained	to Com	Eq	3.5%
	LL.)	TION	2011	2012	9/30/13	53%	58%	4/%	46%	57%	59%	80%	80%	61%	59%	50%	54%		s to Net H	rot	50%
Other	ssets	_	42.2	40.4	<u> </u>	chase,	storage,	purificati	oration e on, distrib	oution, ar	nd retail s	ale of w	n, pur- ater. It-	services	, includin	ne con ng water	system of	perations	s, cash re	a water-	es, and
Current Accts F	t Assets Pavable		68.9 7 4	42.9 8.5	49.3 11.8	provide	es water	service t	o approxi	imately 2	27,000 c	onnectio	ns that	mainten	ance con	ntract ser	vices. S.	JW also d	wns and	l operate	s com-
Debt D Other	ue		.8 20.1	20.7 19.9	7.6	Jose a	rea and	8,700 co	nnections	that ser	ve appro	ximately	36,000	Charles	J. Toeni	iskoetter.	Inc.: CA	. Addres	s: 110 W	l. Taylor	Street,
Current	t Liab.	_	28.3	49.1	49.7	resider	nts in a s	ervice ar	ea in the	region b	etween S	San Anto	nio and	San Jos	e, CA 95	5110. Tel	.: (408) 2	79-7800.	Int: www	.sjwater.	com.
FIX. Ch	g. Cov.	2 S Pact	.76% Pa	247% st Est'd	231%	We	have mate	low	ered	our Higho	2013 r. cost	earn	both	actio	nsisr 's sh	not an	exact	t scien	ice. dond	are	wth
of chang	e (per sh)	10 Yrs.	5 Yi	s. to	16-18	extra	acting	grou	nd wa	ter a	nd for	r pur	chas-	pros	pects	are	unex	citing	g. The		pany
"Cash	Flow"	5.5 6.5	% 4. % 3.	5% s	4.0% 5.0%	ing	water	on th	ne ope	n ma	rket r	esulte	ed in	is ex	pected	to r	aise i oarly	ts div	idend	later	this
Divider	ids	4.0	% -1. % 4.	5% 0%	7.5% 4.5%	third	l-quar	ter ea	rning	s per	share	e. As	a re-	month or in early February. We are anticipating only a quarterly increase of							
BOOK V		D.D	% 3.	5 % (1)	5.0%	sult,	we t	hink t	he con	npany	y's ani	nual s	share	\$0.005 a share (or \$0.02 a share on an an-							
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Full Year	prev	ious e	stima	1 \$1.2 te.	0, 30.	10 les	s thai	i our	nual basis). This increase is only 2.7%, versus the industry average of over 5%. As						6. As	
2010	40.4	54.1	70.3	50.8	215.6	Ear	nings	for	the	next	seve	ral y	ears	futur	e rate	e relie	ef ís i	mplen	nente	d, the	re is
2011	43.7 51.1	59.0 65.6	73.9 82.4	62.4 62.4	239.0	will 2012	depe SIW	e nd u V filed	pon s a rat	state te cas	regu e with	lator the	s. In Cali-	the j	possib	ility ervati	that (ve	our p	rojecti	ions (could
2013	50.1	74.2	85.2	65.5	275	forn	a Pu	blic U	tility	Com	missio	n (Cl	PUC)	SJW	's op	perate	es i	n he	althy	ser	vice
2014	50.0 FA	RNINGS	ER SHAR	75.0 E A	510	seek	ing to) have % in	e rate 2014	s inci and	reased	21.5	% in 2016	area	s. The	e com n Sar	pany'	s mai	n util home	lity of	pera-
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	resp	ectful	ly. Ra	uising	cust	omers	, in <i>i</i> bill	s by	Valle	y. Wl	hile	other	parts	s of	Calif	ornia
2010	.055	.24	.44	.11	.84	such	sign	ificant	amo	unts	is no	t eas	y for	may	suffer	, due	to th	ie hig	h cos	t of o	loing
2012	.05	.29 .28	.44 .53	.35	1.18	any	antia	iated	and h	ever, adlv	SJW3 in nee	s pipe ed of	mod-	shou	iess, t ld co	ontini	ageo ie to	ograpi o ex	nc 100 periei	ación ice	solid
2013	.07	.37	.44	.32	1.20	erniz	zation	•		j -				grow	th. N	loreov	ver, t	he co	mpar	ıy's ∏	Texas
Cal-	QUAR	.40 Terly div	IDENDS P	AID ^B	Full	We ing	are S.IW	guard s cha	ledly	opti of r	misti eceiv	c reg ing s	ard-	subsi Austi	diary	is San ∆r	locate	ed in	the dor	thr	iving
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	vora	ble r	uling	. With	the	excep	tion o	f the	• We think that there are other stocks							
2010	.17 173	.17 173	.17 173	.17 173	.68 03	allov	ved i	eturn	on	equit	y, th	e CP	UC's	s in the water utility group that hold greater appeal than SIW On a risk ad							
2012	.1775	.1775	.1775	.1775	.03	Utili	ties t	hat ha	ave m	ade s	ound	argun	nents	juste	d basi	is, th	e equ	ity's p	rospe	cts a	re in
2013	.1825	.1825	.1825	.1825	.73	for t	the ne	ed fo	r higi	her ta	riffs	have	been	line v	with t	he ind	lustry	avera	iges.	. 17	2014
					1	trea	lea ta	uriy. S	still,	preate	ung	regula	ators	Jam	-5 A. I	-100d		Já	uuar	V 17, 1	cU14

(A) Diluted earnings. Excludes nonrecurring losses : 03, \$1.97; '04, \$3.78; '05, \$1.09; '06, \$16.36; '08, \$1.22; '10, 46¢. Next earnings report due early February. Quarterly eqs. may
 (B) Dividends historically paid in early March, \$16.36; '08, \$1.22; '10, 46¢. Next earnings report due early February. Quarterly eqs. may
 (C) In millions, adjusted for stock splits. June, September, and December.

 Divid rein-vestment plan available.
 (C) In millions, adjusted for stock splits.

 (C) In millions, adjusted for stock splits. In the publishing LLC. All rights reserved. Factual material is obtained from sources believed to be reliable and is provided without warranties of any kind. THE PUBLISHER IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS HEREIN. This publication is strictly for subscriber's own, non-commercial, internal use. No part of it may be reproduced, resold, stored or transmitted in any printed, electronic or other form, or used for generating or marketing any printed or electronic publication, service or product.

u	January 17	, 2014
Company's Fin	ancial Strength	B+
Stock's Price S	tability	80
Price Growth P	ersistence	45
Earnings Predi	ctability	80
To subscrib	e call 1-800-8	33-0046

Exhibit No. Schedule PMA-8 Rebuttal

																			Page 1	1 of 3	4
YO	RK V	VATI		DQ-YOR	W		R P	ecent Rice	21.3	7 P/E RATI	o 26. '	7 (Traili Medi	ng: 29.7) an: 25.0)	RELATIVI P/E RATI	5 1.4	4 DIV'D YLD	2.7	7%	/ALUI LINE	2	
TIMELIN	IESS 5	Lowered	11/22/13	High: Low:	13.4 8.2	13.5 9.3	14.0 11.0	17.9 11.7	21.0 15.3	18.5 15.5	16.5 6.2	18.0 9.7	18.0 12.8	18.1 15.8	18.5 16.8	22.0 17.6			Target 2016	Price 2017	Range 2018
SAFEIN		2 New 7/1	9/13	LEGE	NDS 10 x Divide	ends p_sh															64
	CAL Z	Raised 1	/3/14	div Re	vided by In elative Pric	terest Rate e Strength															48
BEIA ./	6-18 PR	 Market) O.IFCTI(ONS	2-for-1 sp 3-for-2 sp	olit 5/02 olit 9/06										~						-40 32
201	0-10 1 N	A	nn'l Total	Shaded	no areas indi	cate recess	sions									<u> </u>					24
High	30 (·	6ain +40%)	12%	-				L.I.I.I	ուկոս,	91996.						<mark>μ., μ</mark> μί	•-				20
Low	20 r Decis	(-5%)	2%		ц		սու լ	ոսո	1 1				իսլի ^{ր,}								10
manue	F M A	MJJ	ASO				100	· · · · ·				Ч.									0
to Buy Options	$ \begin{array}{ccc} 0 & 0 & 4 \\ 0 & 0 & 0 \end{array} $	0 1 5 0 0	025000	11 <u>11111111111111111111111111111111111</u>	••																-8
to Sell	0 0 1		0 0 0			••••••	· · · · · · · · · · · · · · · · · · ·		••••	· · · · · ·		•••••						% TOT	RETUR	N 12/13	
mstitu	1Q2013	2Q2013	3Q2013	Percen	t 12 -			•			••••	•••	·•• ••••••	•••••	·				THIS V	INDEX	L
to Buy to Sell	33 21	32 26	30 23	shares	8 -						-							1 yr. 3 yr.	21.7 31.5	38.4 52.8	L
Hid's(000)	3375	3346	3451	2001	2002		2004		2006	2007	2009	2000			2012		2014	5 yr. © VALI	101.4	211.8	16 10
1337	1990		2000	2.05	2002	2003	218	258	256	2007	2,89	2003	3.07	3 18	3.21	340	2014	Revenue	s ner sh	JD. LLU	4 15
				.59	.57	.65	.65	.79	.77	.86	.88	.95	1.07	1.09	1.12	1.25	1.35	"Cash F	low" per s	sh	1.65
				.43	.40	.47	.49	.56	.58	.57	.57	.64	.71	.71	.72	.75	.90	Earning	s per sh A		1.05
				.34	.35	.37	.39	.42	.45	.48	.49	.51	.52	.53	.54	.55	.57	Div'd De	cl'd per s	h B	.70
				3.79	3.90	4.06	4.65	4.85	5.84	5.97	6.14	6.92	7.19	7.45	.94 7.73	7.85	8.70	Book Va	lue per si	ווס ויס ו	9.60
				9.46	9.55	9.63	10.33	10.40	11.20	11.27	11.37	12.56	12.69	12.79	12.92	13.00	12.60	Commo	n Shs Out	st'g ^C	12.00
				17.8	26.9	24.5	25.7	26.3	31.2	30.3	24.6	21.9	20.7	23.9	24.4	26.3		Avg Ann	'I P/E Rat	io	23.0
				.91	1.4/	3.2%	1.30	2.9%	1.68 2.5%	1.61 2.8%	1.48	1.40	3.5%	1.50	1.55	1.47 2.8%		Avg Ann	'l Div'd Y	ield	1.55 2.8%
CAPITA	I STRU		as of 9/3	0/13	0.070	20.9	22.5	26.8	2.070	31.4	32.8	37.0	39.0	40.6	41.4	43.0	46.0	Revenue	s (\$mill)		50.0
Total D	ebt \$84.	9 mill.	Due in 5	Yrs \$19.5	mill.	4.4	4.8	5.8	6.1	6.4	6.4	7.5	8.9	9.1	9.3	10.0	11.5	Net Prof	it (\$mill)		12.5
(Total in	terest co	nill. I overage: 3	LT Intere 2.9x)	st \$5.2 mi	II.	34.8%	36.7%	36.7%	34.4%	36.5%	36.1%	37.9%	38.5%	35.3%	37.6%	36.0%	36.0%	Income 1	Tax Rate		36.0%
Densis		40/40 @	00.7	(45% o	f Cap'l)	12 /0/	42.5%		7.2%	3.6%	10.1%		1.2%	1.1%	1.1%	1.0%	1.0%	AFUDC	% to Net F	Profit	1.0%
Pensio	1 Assets	5 12/12 \$	22.7 mill. Oblig. \$3	4.7 mill.		43.4 <i>%</i> 56.6%	57.5%	55.9%	40.3 % 51.7%	40.3 % 53.5%	45.5%	54.3%	51.7%	52.9%	40.0% 54.0%	40.0 <i>%</i> 55.0%	54.5%	Commor	n Equity F	latio	42.5% 57.5%
Dfd Sto	ck None		-			69.0	83.6	90.3	126.5	125.7	153.4	160.1	176.4	180.2	184.8	190	185	Total Ca	pital (\$mi	II)	200
110 010	CRINOIC					116.5	140.0	155.3	174.4 6.2%	191.6 6.7%	211.4	222.0	228.4	233.0	240.3	245	250	Net Plan	t (\$mill) n Total C	an'l	260 7.5%
Common Stock 12,942,843 shs. 0.576 7.07 as of 11/6/13 11.4% 10.0%						10.0%	11.6%	9.3%	9.5%	9.2%	8.6%	9.8%	9.5%	9.3%	9.5%	11.5%	Return o	n Shr. Eq	uitv	11.0%	
MARKET CAP: \$275 million (Small Can)						10.0%	11.6%	9.3%	9.5%	9.2%	8.6%	9.8%	9.5%	9.3%	9.5%	11.5%	Return o	n Com E	quity	11.0%	
MARKET CAP: \$275 million (Small Cap) 2.6% 2.1% CURRENT POSITION 2011 2012 9/30/13 77% 70%							2.1%	3.0%	2.2%	1.7%	1.4%	1.9%	2.7%	2.5%	2.4%	3.0%	3.0%	Retained	I to Com	Eq	3.5%
	LL.)		2011	2012	60		79%	74%	11%	02%	00%	/0%	12%	13%	74%	/1%	03%				07%
Accoun	ts Rece	ivable	6.0	6.4	3.9	regulat	ed water	utility in	the Unite	ed States	s. It has	operated	contin-	sewer b	illing serv	ices. Inc	orporate	d: PA. Yo	ork had 1	03 full-tir	ne em-
Current	Assets	-	11.4	11.6	14.3	uously	since 18	16. As of	Decemb	er 31, 20)12, the (company	's aver-	ployees ficors/di	at 12/	31/12.	President	t/CEO:	Jeffrey I	R. Hines	s. Of-
Accts P	ayable		1.1	1.1	1.9	tory ha	d an esti	mated po	pulation of	of 189,00	0. Has m	lore than	63,000	dress: "	130 East	Market	Street	York, Per	nsylvani	a 17401	. Tele-
Other		_	4.1	4.3	5.0	custom	ers. Res	idential c	ustomers	accounte	ed for 63	% of 201	2 reve-	phone:	(717) 845	i-3601. Ir	nternet: w	ww.york	water.con	۱.	
Fix. Ch	g. Cov.	1	5.3 160%	5.5 156%	6.9 154%	The	Yorl	k Wa	ter C	omp	any j	proba	ably	And,	even	assu	ming	a re	ductio	n in	the
ANNUA		S Past	Pa	st Est'd	i '10-'12	just	ende	d. We	think	k that	t the	compa	ny's	repui	chase	se re	thin	k that	t the	equit	v-to-
Revenu	e (per sn) Ies	10 Yrs 4.5	. 51 5% 3	rs. to .5%	1 6- 18 4.5%	shar	e net	bare	ly mo	ved h	igher	in ²	2013,	total	capita	al rati	io will	l rema	in at	a hea	lthy
"Cash I Earning	Flow" IS	6.5 5.5	5% 6 5% 4	.5% .5%	7.0% 6.5%	reac	ning fourth	30.73, 1-cons	at d ecutive	est. e vea	rin v	repres which	the	55% bv 2	next y 016-20	year, 1)18. F	ana g Tavin	radua g soli	d fina	se to	o7% will
Dividen Book V	ids alue	1.5 7.0	5%3 0%6	.0% .0%	5.0% 4.5%	botto	om li	ne ha	is sho	owed	little	impi	ove-	also provide York with greater flexibility.							
Cal-	QUAF	TERLY RE	EVENUES	(\$ mill.)	Full	men	t. Mo	preove	r, the	e divi	idend mo tir	only	in- riod	As the industry continues to consolidate, perhaps a small acquisition or two could							
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	Hig	her r	ates of	could	possi	ibly p	provi	de a	be m	ade to	help	foster	earn	ings g	rowth	l.
2010	9.0 9.6	9.7 10.5	10.5 10.5	9.8 10.0	39.0 40 6	nice	lift	to pi	rofits	in 2	014,	howe	ver.	We l	have.	raise	d th	e cor	npan	y's lo	ng-
2012	9.6	10.4	11.0	10.4	41.4	YOFK	is st filed	lli aw	aiting vear i	the r n Per	uling	on a	rate The	term raise	divi dits	dena divide	grov end b	vtn p	rospe % last	cts. 1 t quat	(OrK rter
2013	10.1	10.7 11 5	10.9 12 2	11.3 11 8	43.0	petit	ion w	as for	a 17%	6 hike	in ta	riffs t	o en-	nearl	y dou	ıble	the a	iverag	e of	the	past
Cal-	E/	RNINGS	PER SHAR	E A	Full	able	it to	recov	ver the	e nea	rly \$	50 mi	llion	sever	al yea	ars. T	hough	this	rate i	s stil	l be-
endar	Mar.31	Jun. 30	Sep. 30	Dec. 31	Year	upgr	ading	the	syster	n's de	eterio	rating	in-	more	positi	ive lor	aver ng-ter	m trei	nd.	it sign	ai d
2010	.15 17	.18 19	.21 19	.17 16	.71 71	frast	ructu	re.				0		York	sha	ares	are	nov	v ra	nked	5
2012	.15	.17	.22	.18	.72	A S	nare- heli	repui n. Th	rchase	e pro	ogran / has	n wo n't ra	eally	(LOW form	est) ance	t or y Whil	ear-a	nead	relat ok for	u ve j the d	p er-
2013	.17 . 19	.18 .22	.19 .22	.21 .22	.75	boug	ht ba	ck an	y of th	he 1.2	2 milli	ion sh	ares	pany	has	impi	roved	since	our	Oct	ober
Cal-	QUA	RTERLY DI	VIDENDS	PAID ^B	Full	auth	orized	i by i	ts boa might	rd me	ore th	an a	year	repor	t, it r	now aj	ppear	s that	all of	the o	com-
endar	Mar.31	Jun.30	Sep.30	Dec.31	Year	the	amou	nt rep	presen	ts m	ore th	an 9	% of	in th	e rece	ent st	ock p	rice. I	ndeed	, the	cur-
2010	.128	.128 .131	.128 .131	.128 .131	.512	the o	compa	ny's o	utstan	ding	share	5.		rent	price	earni	ings	ratio	of nea	arly 2	7 is
2012	.134	.134	.134	.134	.535	good	uaia d sł	nce s ape.	Meet Yorl	snou k's f	inanc	es ł	i in iave	eral 1	narke	t.	wate	i utili	ty and	i uie	gen-
2013	.138	.138	.138	.130	.552	strei	ngthei	ned ov	ver th	e last	seve	ral y	ears.	Jame	es A. I	Flood		J_{i}	anuar	y 17,	2014

Company's Financial Strength Stock's Price Stability Price Growth Persistence Earnings Predictability B+ 90 70 100 To subscribe call 1-800-833-0046.

 (A) Diluted earnings. Next earnings report due early February.
 (B) Dividends historically paid in mid-January, April, July, and October.
 (C) In millions, adjusted for splits.

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United Water Rhode Island, Inc. Summary of Risk Premium Models for the Proxy Group of Nine Water Companies

		Proxy Group of Nine Water Companies
Predictive Risk Premium Model ™ (PRPM™) (1)		11.89 %
Risk Premium Using an Adjusted Market		
Approach (2)		9.67 %
	Average	<u> 11.33 </u> %

Notes:

(1) From page 13 of this Schedule.

(2) From page 14 of this Schedule.

GARCH Coefficient (1)	American States Water Co. 1.541826259	American Water Works Co., Inc. 4.572332998	Aqua America, Inc. 2.198333083	Artesian Resources Corp. 2.159831171	California Water Service Group 1.83967266	Connecticut Water Service, Inc. 1.808647271	Middlesex Water Company 1.950055786	SJW Corporation 1.364467426	York Water Company 1.995065254
Average Variance (1)	0.39%	0.25%	0.48%	0.30%	0.31%	0.28%	0.27%	0.42%	0.46%
PRPM TM Derived Risk Premium (1)	7.45%	14.41%	13.30%	8.11%	7.12%	6.35%	6.49%	2.09%	11.57%
Risk-Free Rate (2)	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%	4.44%
Indicated Cost of Common Equity	11.89%	18.85%	17.74%	12.55%	11.56%	10.79%	10.93%	11.53%	16.01%
								Average	13.54%
								Median	11.89%

Notes: (1) Based upon data from CRSP(R) Data © 2012, Center For Research in Security Prices (CRSP(R)), The University of Chicago Booth School of Business. (2) From note 3 on page 23 of this Schedule.

Exhibit No.___ Schedule PMA-8 Rebuttal Page 13 of 34

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Through Use of a Risk Premium Model Using an Adjusted Total Market Approach

Line No.			Proxy Group of Nine Water Companies
1.		Prospective Yield on Aaa Rated Corporate Bonds (1)	5.19 %
2.		Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A Rated Public Utility Bonds	0.16 (2)
3.		Adjusted Prospective Yield on A Rated Public Utility Bonds	5.35 %
4.		Adjustment to Reflect Bond Rating Difference of Proxy Group	-0.04 (3)
5.		Adjusted Prospective Bond Yield	5.32 %
6.		Equity Risk Premium (5)	4.35
7.		Risk Premium Derived Common Equity Cost Rate	<u>9.67</u> %
Notes:	(1)	Six quarter average consensus forecast ending averaged with the 2015-2019 and 2020-2024 co Moody's Aaa Rated Corporate bonds from Blue	with Q1 of 2015 onsensus forecast of Chip Financial

(2) The average yield spread of A rated public utility bonds over Aaa rated corporate bonds of 0.16% from page 16 of this Schedule.

- (3) Adjustment to reflect the A1/A2 Moody's bond rating of the proxy group of nine water companies as shown on page 16 of this Schedule. The 4 basis point adjustment is derived by taking 1/6 of the spread between Aa2 and A2 Public Utility Bonds (1/6 * 0.21% = 0.04%).
- (4) From page 17 of this Schedule.

United Water Rhode Island, Inc. Comparison of Bond Ratings, Business Risk and Financial Risk Profiles for the Proxy Group of Nine Water Companies

	M	oody's	Standa	Standard & Poor's			
	Bon	d Rating	Bon	d Rating			
	Febru	uary 2014	Febru	ary 2014			
Proxy Group of Nine Water Companies	Bond Rating	Numerical Weighting (1)	Bond Rating	Numerical Weighting (1)			
American States Water Co. (2)	A2	6.0	A+	5.0			
American Water Works Co., Inc. (3)	A1	5.0	А	6.0			
Aqua America, Inc. (4)	NR		AA-	4.0			
Artesian Resources Corp.	NR		NR				
California Water Service Group (5)	NR		AA-	4.0			
Connecticut Water Service, Inc. (6)	NR		A/A-	6.5			
Middlesex Water Company	NR		А	6.0			
SJW Corporation (7)	NR		А	6.0			
York Water Company	NR		A-	7.0			
Average	A1/A2	5.5	A+/A	5.5			

Notes:

(1) From Schedule PMA-7, page 5 of Ms. Ahern's Direct Exhibit.

(2) Ratings are those of Golden State Water Company.

(3) Ratings are those of Pennsylvania American Water.

(4) Ratings are those of Aqua Pennsylvania, Inc.

(5) Ratings are those of California Water Service Co.

(6) Ratings are those of Connecticut Water Company.

(7) Ratings are those of San Jose Water Co.

Source Information:

Moody's Investors Service

Standard & Poor's Global Utilities Rating Service

<u>MoodVS</u> Comparison of Interest Rate Trends for the Three Months Ending January 2014 (1)

olic Utility Bonds			Baa over A				0.45 %
Spread - Pub			A over Aa				0.21 %
tility Bonds	Baa (Pub.	Util.) over	Aaa (Corp.)				0.61 %
prporate v. Public U	A (Pub. Util.)	over Aaa	(Corp.)				0.16 %
Spread - Co	Aa (Pub. Util.)	over Aaa	(Corp.)				(0.05) %
			Baa Rated	5.09 %	5.25	5.24	5.19 %
		Public Utility Bonds	A Rated	4.63 %	4.81	4.77	4.74 %
			Aa Rated	4.44 %	4.59	4.56	4.53 %
	Corporate	Bonds	Aaa Rated	4.49 %	4.62	4.63	4.58 %
			Months	January-14	December-13	November-13	Average of Last 3 Months

Notes: (1) All yields are distributed yields.

Source of Information: Mergent Bond Record, February 2014, Vol. 81, No. 2.

United Water Rhode Island, Inc. Judgment of Equity Risk Premium for the Proxy Group of Nine Water Companies

Line No.		Proxy Group of Nine Water Companies
1.	Calculated equity risk premium based on the total market using	
	the beta approach (1)	4.00 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities	
	with A rated bonds (2)	4.70
3.	Average equity risk premium	4.35 %
Notes:	(1) From page 18 of this Schedule.	

(2) From page 21 of this Schedule.

United Water Rhode Island, Inc. Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for the Proxy Group of Nine Water Companies

Line No.		Proxy Group of Nine Water Companies	
	Based on SBBI Valuation Yearbook Data:		
1.	Ibbotson Equity Risk Premium (1)	5.60 %	, D
2.	Ibbotson Equity Risk Premium based on $PRPM^{TM}$ (2)	9.33	
	Based on Value Line Summary and Index:		
3.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (3)	3.55	
4.	Conclusion of Equity Risk Premium (4)	6.16 %	, D
5.	Adjusted Value Line Beta (5)	0.65	
6	Beta Adjusted Equity Risk Premium	4.00 %	'n

- Notes: (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2012 Valuation Yearbook Market Results for Stocks, Bonds, Bills, and Inflation minus the arithmetic mean monthly yield of Moody's Aaa and Aa corporate bonds from 1926 2012. (11.83% 6.23% = 5.60%).
 - (2) The Predictive Risk Premium Model (PRPMTM) is discussed in Ms. Ahern's accompanying direct testimony. The Ibbotson equity risk premium based on the PRPMTM is derived by applying the PRPMTM to the monthly risk premiums between Ibbotson large company common stock monthly returns minus the average Aaa and Aa corporate monthly bond yields, from January 1928 through December 2013.
 - (3) The equity risk premium based on the Value Line Summary and Index is derived from taking the projected 3-5 year total annual market return of 8.74% (described fully in note 1 of page 23 of this Schedule) and subtracting the average consensus forecast of Aaa corporate bonds of 5.19% (Shown on page 14 of this Schedule). (8.74% 5.19% = 3.55%).
 - (4) Average of Lines 1, 2, & 3.
 - (5) Median beta derived from page 22 of this Schedule.
 - Sources of Information:

Ibbotson® SBBI® 2013 Valuation Yearbook - Market Results for Stocks, Bonds, Bills, and Inflation, Morningstar, Inc., 2013 Chicago, IL. Industrial Manual and Mergent Bond Record Monthly Update. Value Line Summary and Index Blue Chip Financial Forecasts, February 1, 2014

Consensus Forecasts Of U.S. Interest Rates And Key Assumptions¹

	History						Cons	ensus 1	Foreca	sts-Qu	arterly	Avg.		
	Av	erage For	Week End	ding	Ave	rage For M	Month	Latest Q	1Q	2Q	3Q	4Q	1Q	2Q
Interest Rates	Jan. 24	Jan. 17	Jan. 10	Jan. 3	Dec.	Nov.	Oct.	<u>4Q 2013</u>	<u>2014</u>	<u>2014</u>	<u>2014</u>	<u>2014</u>	<u>2015</u>	<u>2015</u>
Federal Funds Rate	0.07	0.07	0.08	0.08	0.09	0.08	0.09	0.09	0.1	0.1	0.2	0.2	0.2	0.3
Prime Rate	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.3	3.3	3.3	3.3	3.3	3.4
LIBOR, 3-mo.	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.3	0.3	0.3	0.4	0.4	0.5
Commercial Paper, 1-mo.	0.05	0.05	0.05	0.05	0.06	0.05	0.07	0.06	0.1	0.1	0.1	0.2	0.2	0.4
Treasury bill, 3-mo.	0.04	0.04	0.05	0.07	0.07	0.07	0.05	0.06	0.1	0.1	0.1	0.1	0.2	0.3
Treasury bill, 6-mo.	0.07	0.06	0.07	0.10	0.10	0.10	0.08	0.09	0.1	0.1	0.2	0.2	0.3	0.4
Treasury bill, 1 yr.	0.11	0.11	0.13	0.13	0.13	0.12	0.12	0.12	0.2	0.2	0.3	0.4	0.5	0.7
Treasury note, 2 yr.	0.41	040	0.41	0.39	0.34	0.30	0.34	0.33	0.4	0.5	0.6	0.8	1.0	1.2
Treasury note, 5 yr.	1.67	1.65	1.71	1.73	1.58	1.37	1.37	1.44	1.7	1.8	1.9	2.1	2.2	2.4
Treasury note, 10 yr.	2.86	2.86	2.96	3.01	2.90	2.72	2.62	2.75	3.0	3.1	3.2	3.3	3.4	3.5
Treasury note, 30 yr.	3.75	3.78	3.87	3.93	3.89	3.80	3.68	3.79	3.9	4.0	4.1	4.3	4.3	4.4
Corporate Aaa bond	4.47	4.48	4.53	4.55	4.62	4.63	4.53	4.59	4.6	4.8	4.9	5.0	5.1	5.2
Corporate Baa bond	5.17	5.19	5.28	5.35	5.38	5.38	5.31	5.36	5.4	5.6	5.7	5.8	5.9	6.0
State & Local bonds	4.50	4.55	4.68	4.75	4.73	4.60	4.56	4.63	4.6	4.7	4.8	4.8	4.9	5.0
Home mortgage rate	4.39	4.41	4.51	4.53	4.46	4.26	4.19	4.30	4.6	4.7	4.8	5.0	5.1	5.2
				Histo	ry				Co	onsensi	is Fore	casts-(Juarte	rly
	1Q	2Q	3Q	4Q	1Q	2Q	3Q	$4Q^*$	1Q	2Q	3Q	4Q	1Q	2Q
Key Assumptions	2012	2012	2012	2012	2013	2013	2013	<u>2013</u>	2014	2014	2014	2014	2015	2015
Major Currency Index	72.9	73.9	74.0	73.2	74.7	76.4	76.7	76.0	76.8	77.2	77.6	77.6	77.7	77.7
Real GDP	3.7	1.2	2.8	0.1	1.1	2.5	4.1	3.1	2.5	2.8	2.9	3.0	3.0	3.0
GDP Price Index	2.0	1.8	2.3	1.1	1.3	0.6	2.0	1.4	1.7	1.7	1.9	1.9	2.0	2.0
Consumer Price Index	2.3	1.0	2.1	2.2	1.4	0.0	2.6	0.9	1.8	1.8	2.1	2.0	2.1	2.0

Forecasts for interest rates and the Federal Reserve's Major Currency Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index and Consumer Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data for interest rates except LIBOR is from Federal Reserve Release (FRSR) H.15. LIBOR quotes available from *The Wall Street Journal*. Interest rate definitions are same as those in FRSR H.15. Treasury yields are reported on a constant maturity basis. Historical data for Fed's Major Currency Index is from FRSR H.10 and G.5. Historical data for Real GDP and GDP Chained Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index (CPI) history is from the Department of Labor's Bureau of Labor Statistics (BLS). **Figures for 4Q* 2013 Real GDP and GDP Chained Price Index are consensus forecasts based on a special question asked of the panelists' this month.



U.S. 3-Mo. T-Bills & 10-Yr. T-Note Yield





Long-Range Estimates:

The table below contains results of our semi-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are estimates for the years 2015 through 2019 and averages for the five-year periods 2015-2019 and 2020-2024. Apply these projections cautiously. Few economic, demographic and political forces can be evaluated accurately over such long time spans.

			Awera	age For Th	e Year		Five-Year	Averages
Interest Rates		<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	2015-2019	2020-2024
1. Federal Funds Rate	CONSENSUS	0.4	1.7	2.9	3.6	3.9	2.5	3.7
	Top 10 Average	0.8	2.6	3.9	4.2	4.5	3.2	4.4
	Bottom 10 Average	0.2	0.8	1.6	2.6	3.1	1.6	2.9
2. Prime Rate	CONSENSUS	3.5	4.8	6.0	6.6	6.9	5.6	6.7
	Top 10 Average	3.9	5.6	69	7.2	7.6	62	74
	Bottom 10 Average	33	4.1	5.0	5.7	6.1	4.8	5.8
2 LIBOD 2 Mo	CONSENSUS	0.0	2.2	3.0	<u> </u>	4.2	2.0	<u> </u>
5. LIBOR, 5-WO.		1.5	2.2	3.5	4.0	4. 2	2.9	4.0
	Top to Average	1.0	5.5	4.0	5.0	5.2	3.9	5.0
	Bottom 10 Average	0.4	1.1	2.0	2.8	3.3	1.9	3.0
4. Commercial Paper, 1-Mo.	CONSENSUS	0.6	2.0	3.1	3.7	3.9	2.6	3.7
	Top 10 Average	1.0	2.7	3.9	4.3	4.5	3.3	4.3
	Bottom 10 Average	0.3	1.3	2.3	2.9	3.1	2.0	3.0
5. Treasury Bill Yield, 3-Mo.	CONSENSUS	0.5	1.7	2.9	3.5	3.7	2.5	3.6
	Top 10 Average	1.0	2.7	3.9	4.3	4.5	3.3	4.3
	Bottom 10 Average	0.2	0.8	1.7	2.4	3.0	1.6	2.7
6. Treasury Bill Yield, 6-Mo.	CONSENSUS	0.7	2.0	3.1	3.7	3.9	2.7	3.8
•	Top 10 Average	1.2	2.9	4.1	4.5	4.6	3.5	4.5
	Bottom 10 Average	03	1.1	19	2.7	3.1	1.8	2.8
7 Treasury Bill Yield 1-Yr	CONSENSUS	0.9	2.2	3.2	3.8	4.0	2.8	3.9
7. Heastry Dir Heid, 1-11.	Top 10 Average	1.5	3.2	43	47	4.0	2.0	1.6
	Pottom 10 Average	0.4	1.2	4.3	4.7	4.0	1.0	4.0
	Bottolii IO Average	0.4	1.2	2.0	2.0	5.1	1.9	2.9
8. Treasury Note Yield, 2-Yr.	CONSENSUS	1.4	2.6	3.6	4.0	4.3	3.2	4.2
	Top 10 Average	2.0	3.5	4.5	4.9	5.0	4.0	4.9
	Bottom 10 Average	0.8	1.7	2.4	3.1	3.5	2.3	3.3
10. Treasury Note Yield, 5-Yr.	CONSENSUS	2.3	3.3	4.1	4.4	4.6	3.7	4.4
	Top 10 Average	2.9	4.0	4.8	5.1	5.3	4.4	5.1
	Bottom 10 Average	1.7	2.6	3.2	3.5	3.7	2.9	3.6
11. Treasury Note Yield, 10-Yr.	CONSENSUS	3.4	4.1	4.6	4.8	5.0	4.4	4.9
	Top 10 Average	3.9	4.8	5.3	5.6	5.8	5.1	5.6
	Bottom 10 Average	2.8	3.5	3.8	4.0	4.1	3.7	4.0
12. Treasury Bond Yield, 30-Yr.	CONSENSUS	4.3	4.7	5.2	5.5	5.6	5.0	5.5
j i i i i i i i i i i i i i i i i i i i	Top 10 Average	48	55	60	63	65	5.8	62
	Bottom 10 Average	37	4.0	4.4	4.6	47	43	4.6
13 Corporate Aaa Bond Vield	CONSENSUS	49	5.4	5.9	6.2	63	5.7	6.2
15. Colporate Ada Bolidi Ticki	Top 10 Average	 ,	5. 4 6.2	67	7.0	7.2	5.1	7.0
	Top to Average	5.0	0.2	0.7	7.0	7.2	0.5	7.0
12 C	Bottom IO Average	4.2	4.5	4.9	5.2	5.5	4.8	5.5
13. Corporate Baa Bond Yield		5.9	6.3	0.8	7.1	1.4	6./	7.0
	Top 10 Average	6.5	7.1	7.5	7.9	8.1	7.4	7.9
	Bottom 10 Average	5.1	5.4	5.7	6.1	6.1	5.7	6.0
14. State & Local Bonds Yield	CONSENSUS	4.8	5.2	5.6	5.7	5.7	5.4	5.5
	Top 10 Average	5.2	5.9	6.3	6.5	6.6	6.1	6.3
	Bottom 10 Average	4.3	4.5	4.8	4.9	4.9	4.7	4.7
15. Home Mortgage Rate	CONSENSUS	5.1	5.6	6.1	6.4	6.5	5.9	6.4
	Top 10 Average	5.6	6.3	6.9	7.1	7.3	6.6	7.1
	Bottom 10 Average	4.4	5.0	5.3	5.5	5.6	5.2	5.6
A. FRB - Major Currency Index	CONSENSUS	77.8	78.4	78.8	79.1	79.2	78.7	79.7
5	Top 10 Average	81.0	82.3	83.4	84.2	84.4	83.1	84.8
	Bottom 10 Average	74.6	74.3	74.0	73.7	74.0	74.1	74.7
			N. O	X 7 0	(C			
			Year-O	ver-Year, %	% Change		Five-Year	Averages
		<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2015-2019</u>	2020-2024
B. Real GDP	CONSENSUS	3.0	2.9	2.7	2.6	2.5	2.7	2.4
	Top 10 Average	3.5	3.3	3.1	2.9	2.9	3.1	2.7
	Bottom 10 Average	2.5	2.5	2.3	2.1	2.2	2.3	2.1
C. GDP Chained Price Index	CONSENSUS	2.0	2.1	2.1	2.1	2.1	2.1	2.1
	Top 10 Average	2.5	2.5	2.6	2.5	2.5	2.5	2.5
	Bottom 10 Average	1.5	1.7	1.7	1.7	1.7	1.7	1.7
D. Consumer Price Index	CONSENSUS	2.2	2.3	2.3	2.3	2.3	2.3	2.3
	Top 10 Average	2.6	2.8	2.8	2.8	2.8	2.8	2.8
	Bottom 10 Average	1.7	1.9	1.9	1.9	2.0	1.9	1.9

United Water Rhode Island, Inc. Derivation of Mean Equity Risk Premium Based on a Study Using Holding Period Returns of Public Utilities

		Over A Rated Moody's Public Utility Bonds - AUS Consultants Study (1)
1.	Arithmetic Mean Holding Period Returns on the Standard & Poor's Utility Index 1926- 2012 (2):	10.69 %
2.	Arithmetic Mean Yield on Moody's A Rated Public Utility Yields 1926-2012	(6.53)
3.	Historical Equity Risk Premium	4.16 %
4.	Forecasted Equity Risk Premium Based on PRPM [™] (3)	5.24
5.	Average of Historical and PRPM [™] Equity Risk Premium	<u> </u>

Notes: (1) Based on S&P Public Utility Index monthly total returns and Moody's Public Utility Bond average monthly yields from 1926-2012, (AUS Consultants, 2013).
 (2) Holding period returns are calculated based upon income received (dividends)

and interest) plus the relative change in the market value of a security over a one-year holding period.

(3) The Predictive Risk Premium Model (PRPM[™]) is applied to the risk premium of the monthly total returns of the S&P Utility Index and the monthly yields on Moody's A rated public utility bonds from 1928 - 2012.

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Through Use of the Traditional Capital Asset Pricing Model (CAPM) and Empirical Capital Asset Pricing Model (ECAPM)

	<u>1</u>	2	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>
Proxy Group of Nine Water Companies	Value Line Adjusted Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate (3)	ECAPM Cost Rate (4)	Indicated Common Equity Cost Rate (5)
American States Water Co.	0.65	7.09 %	4.44 %	9.05 %	9.67 %	
American Water Works Co., Inc.	0.65	7.09	4.44	9.05	9.67	
Aqua America, Inc.	0.60	7.09	4.44	8.69	9.40	
Artesian Resources Corp.	0.55	7.09	4.44	8.34	9.14	
California Water Service Group	0.60	7.09	4.44	8.69	9.40	
Connecticut Water Service, Inc.	0.75	7.09	4.44	9.76	10.20	
Middlesex Water Company	0.75	7.09	4.44	9.76	10.20	
SJW Corporation	0.85	7.09	4.44	10.47	10.73	
York Water Company	0.70	7.09	4.44	9.40	9.93	
Average	0.68			9.25 %	9.82 %	<u>9.54</u> %
Median	0.65			<u>9.05</u> %	9.67 %	9.36 %

See page 23 for notes.

United Water Rhode Island, Inc. Development of the Market-Required Rate of Return on Common Equity Using the Capital Asset Pricing Model for the Proxy Group of Nine Water Companies Adjusted to Reflect a Forecasted Risk-Free Rate and Market Return

Notes:

(1) For reasons explained in Ms. Ahern's accompanying direct testimony, from the 13 weeks ending February 7, 2014, <u>Value Line Summary & Index</u>, a forecasted 3-5 year total annual market return of 8.74% can be derived by averaging the 13 weeks ending February 7, 2014 forecasted total 3-5 year total appreciation, converting it into an annual market appreciation and adding the <u>Value Line</u> average forecasted annual dividend yield.

The 3-5 year average total market appreciation of 30% produces a four-year average annual return of 6.78% (($1.30^{0.25}$) - 1). When the average annual forecasted dividend yield of 1.96% is added, a total average market return of 8.74% (1.96% + 6.78%) is derived.

The 13 weeks ending February 7, 2014 forecasted total market return of 8.74% minus the risk-free rate of 4.44% (developed in Note 2) is 4.30% (8.74% - 4.44%).

The Predictive Risk Premium Model (PRPM[™]) market equity risk premium of 10.43% is derived by applying the PRPM[™] to the monthly equity risk premium of large company common stocks over the income return on long-term U.S. Government Securities from January 1926 through December 2013.

The Morningstar, Inc. (Ibbotson Associates) calculated arithmetic mean monthly market equity risk premium of 6.55% for the period 1926-2012 results from a total market return of 11.83% less the arithmetic mean income return on long-term U.S. Government Securities of 5.28% (11.83% - 5.28% = 6.55%).

These three expectational risk premiums are then averaged, resulting in a 7.09% market equity risk premium, which is then multiplied by the beta in column 1 of page 1 of this Schedule. ((4.30% + 10.43% + 6.55%)/3).

(2) For reasons explained in Ms. Ahern's direct testimony, the risk-free rate that Ms. Ahern relies upon for her CAPM analysis is the average forecast of 30-year Treasury Note yields per the consensus of nearly 50 economists reported in the <u>Blue</u> <u>Chip Financial Forecasts</u> dated December 1, 2013 and February 1, 2014 (see pages 19 & 20 of this Schedule). The estimates are detailed below:

	<u>30-Year</u>
	Treasury Note Yield
First Quarter 2014	3.90%
Second Quarter 2014	4.00%
Third Quarter 2014	4.10%
Fourth Quarter 2014	4.30%
First Quarter 2015	4.30%
Second Quarter 2015	4.40%
2015 – 2019	5.00%
2020 – 2024	<u>5.50%</u>
Average	4.44%

(3) The traditional Capital Asset Pricing Model (CAPM) is applied using the following formula:

 $R_S = R_F + \beta (R_M - R_F)$

 $\begin{array}{ll} \mbox{Where} & R_S = \mbox{Return rate of common stock} \\ & R_F = \mbox{Risk Free Rate} \\ & \beta & = \mbox{Value Line Adjusted Beta} \\ & R_M = \mbox{Return on the market as a whole} \end{array}$

(4) The empirical CAPM is applied using the following formula:

 $R_{S} = R_{F} + .25 (R_{M} - R_{F}) + .75 \beta (R_{M} - R_{F})$

Where R_s = Return rate of common stock R_F = Risk-Free Rate β = Value Line Adjusted Beta R_M = Return on the market as a whole

Source of Information: Value Line Summary & Index Blue Chip Financial Forecasts, December 1, 2013 & February 1, 2014 Value Line Investment Survey, (Standard Edition) 2013 Ibbotson[®] SBBI[®] Valuation Yearbook, Morningstar, Inc., 2013, Chicago, IL

<u>United Water Rhode Island, Inc.</u> Summary of Cost of Equity Models Applied to the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the <u>Proxy Group of Nine Water Companies</u>

Principal Methods		Proxy Group o Twenty-Sever Non-Price- Regulated	วf า
Discounted Cash Flow Model (DCF) (1)	_	12.02	%
Risk Premium Model (RPM) (2)		10.32	%
Capital Asset Pricing Model (CAPM) (3)		9.67	%
	Average	10.67	%

Notes:

- (1) From page 28 of this Schedule.
- (2) From page 29 of this Schedule.
- (3) From Page 32 of this Schedule.

United Water Rhode Island, Inc. Basis of Selection of Comparable Risk Domestic Non-Price Regulated Companies

			Residual	
	Value Line		Standard Error	Standard
Proxy Group of Nine Water	Adjusted	Unadjusted	of the	Deviation of
Companies	Beta	Beta	Regression	Beta
American States Water Co.	0.70	0.48	3.3620	0.0650
American Water Works Co., Inc.	0.65	0.44	3.0655	0.0610
Aqua America, Inc.	0.60	0.36	2.5902	0.0501
Artesian Resources Corp.	0.55	0.30	2.6477	0.0512
California Water Service Group	0.65	0.40	2.7115	0.0524
Connecticut Water Service, Inc.	0.75	0.58	3.1061	0.0601
Middlesex Water Company	0.70	0.54	2.6637	0.0515
SJW Corporation	0.85	0.70	3.6057	0.0697
York Water Company	0.70	0.48	3.1325	0.0606
Average	0.68	0.48	2.9872	0.0580
Beta Range (+/- 2 std. Devs. of Beta)	0.36	0.60		
2 std. Devs. of Beta	0.12	0.00		
Residual Std. Err. Range (+/- 2 std.				
Devs. of the Residual Std. Err.)	2.7246	3.2498		
,				
Std. dev. of the Res. Std. Err.	0.1313			
2 std. devs. of the Res. Std. Err.	0.2626			

United Water Rhode Island, Inc. Proxy Group of Non-Price Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

Proxy Group of Twenty-Seven Non-	VL Adjusted	Unadjusted	Residual Standard Error of the	Standard Deviation of
Price-Regulated Companies	Beta	Beta	Regression	Beta
Gallagher (Arthur J.)	0.75	0.57	2.9742	0.0575
Baxter Intl Inc.	0.70	0.49	2.9372	0.0568
Bristol-Myers Squibb	0.70	0.50	2.8839	0.0558
Brown & Brown	0.75	0.55	3.1464	0.0608
ConAgra Foods	0.65	0.42	2.7898	0.0540
Capitol Fed. Finl	0.60	0.39	3.0449	0.0589
Quest Diagnostics	0.75	0.59	2.7655	0.0535
Dun & Bradstreet	0.75	0.60	2.9024	0.0561
DaVita HealthCare	0.65	0.46	2.8841	0.0558
Haemonetics Corp.	0.65	0.41	2.7538	0.0533
Kroger Co.	0.60	0.36	2.8843	0.0558
Lancaster Colony	0.70	0.53	3.1660	0.0612
McKesson Corp.	0.75	0.58	3.2240	0.0623
Mercury General	0.70	0.48	3.0066	0.0581
Mead Johnson Nutrition	0.65	0.43	3.1630	0.0824
Annaly Capital Mgmt.	0.65	0.39	3.2022	0.0619
Northwest Bancshares	0.75	0.59	3.0864	0.0597
Owens & Minor	0.70	0.53	3.2368	0.0626
Peoples United Finl	0.65	0.46	2.8665	0.0554
Sherwin-Williams	0.70	0.48	2.9688	0.0574
Smucker (J.M.)	0.70	0.49	2.9429	0.0569
Silgan Holdings	0.75	0.56	2.8926	0.0559
Suburban Propane	0.70	0.54	3.0689	0.0593
Stericycle Inc.	0.70	0.49	2.9267	0.0566
Waste Connections	0.70	0.53	2.7663	0.0535
Weis Markets	0.65	0.42	2.9050	0.0562
Berkley (W.R.)	0.70	0.47	2.9475	0.0570
Average	0.69	0.49	2.9754	0.0583
Proxy Group of Nine Water				
Companies	0.68	0.48	2.9872	0.0580

Basis of Selection of the Group of Non-Price Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

The criteria for selection of the proxy group of twenty-seven non-price regulated companies was that the non-price regulated companies be domestic and reported in Value Line Investment Survey (Standard Edition).

The proxy group of twenty-seven non-price regulated companies were then selected based upon the unadjusted beta range of 0.36 - 0.60 and standard error of the regression range of 2.7246 - 3.2498 of the water proxy group.

These ranges are based upon plus or minus two standard deviations of the unadjusted beta and standard error of the regression. Plus or minus two standard deviations captures 95.50% of the distribution of unadjusted betas and standard errors of the regression.

The standard deviation of the water industry's standard error of the regression is 0.1313. The standard deviation of the standard error of the regression is calculated as follows:

Standard Deviation of the Std. Err. of the Regr. = <u>Standard Error of the Regression</u> $\sqrt{2N}$

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

Thus, 0.1313 = $\frac{2.9872}{\sqrt{518}}$ = $\frac{2.9872}{22.7596}$

Source of Information:	Value Line, Inc., June 15, 2013
	Value Line Investment Survey (Standard Edition)

United Water Rhode Island, Inc. DCF Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies.

Proxy Group of Twenty-Seven Non-Price-Regulated Companies	Average Dividend Yield	Value Line Projected Five Year Growth in EPS	Reuters Mean Consensus Projected Five Year Growth Rate in EPS	Zack's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth Rate in EPS	Adjusted Dividend Yield	Indicated Common Equity Cost Rate
Gallagher (Arthur J.	2.99 %	12.50 %	12.00 %	10.70 %	12.36 %	11.89 %	3.17 %	15.06 %
Baxter Intl Inc.	2.88	8.50	7.40	8.50	7.44	7.96	3.00	10.96
Bristol-Myers Squibb	2.69	10.00	13.00	9.10	13.67	11.44	2.84	14.28
Brown & Brown	1.28	14.00	14.00	13.10	15.53	14.16	1.38	15.54
ConAgra Foods	3.06	11.00	8.80	8.70	8.70	9.30	3.21	12.51
Capitol Fed. Finl	2.51	6.00	5.00	3.50	5.00	4.88	2.57	7.45
Quest Diagnostics	2.12	7.00	9.80	10.60	9.84	9.31	2.22	11.53
Dun & Bradstreet	1.37	9.00	9.90	9.90	9.05	9.46	1.44	10.90
DaVita Inc.	-	14.00	12.00	12.30	12.22	12.63	-	NA
Haemonetics Corp.	-	11.00	13.00	12.30	13.00	12.33	-	NA
Kroger Co.	1.51	10.50	7.90	7.20	7.90	8.38	1.58	9.96
Lancaster Colony	1.87	6.00	7.00	NA	7.00	6.67	1.93	8.60
McKesson Corp.	0.59	10.50	19.00	14.00	19.93	15.86	0.63	16.49
Mercury General	5.15	8.00	2.10	2.10	2.10	3.58	5.24	8.82
Mead Johnson Nutrition	1.65	12.00	10.00	11.80	10.75	11.14	1.74	12.88
Annaly Capital Mgmt.	13.89	(2.50)	NA	3.50	(4.70)	3.50	14.13	17.63
Northwest Bancshares, Inc.	3.63	8.50	5.00	5.00	5.00	5.88	3.74	9.62
Owens & Minor	2.63	10.50	13.00	9.00	13.00	11.38	2.78	14.16
Peoples United Fin	4.44	19.00	12.00	6.50	12.07	12.39	4.71	17.10
Sherwin-Williams	1.08	16.50	14.00	14.60	14.10	14.80	1.16	15.96
Smucker (J.M.)	2.27	8.50	8.40	7.70	8.43	8.26	2.37	10.63
Silgan Holdings	1.20	10.50	9.70	10.30	9.73	10.06	1.26	11.32
Suburban Propane	7.81	6.00	23.00	3.00	23.00	13.75	8.35	22.10
Stericycle Inc.	-	12.00	15.00	16.00	15.67	14.67	-	NA
Waste Connections	0.94	12.00	13.00	19.50	13.85	14.59	1.01	15.60
Weis Markets	2.37	3.50	NA	NA	NA	3.50	2.41	5.91
Berkley (W.R.)	0.94	12.50	7.90	9.50	6.91	9.20	0.99	10.19
Average								12.72 %

^{12.02 %}

Median

NA= Not Available NMF= Not Meaningful Figure

(1) Ms. Ahern's application of the DCF model to the domestic, non-price regluated comparable risk companies is identical to the application of the DCF to her proxy group of water companies. She uses the 60 day average price and the spot indicated dividend as of February 4, 2014 for her dividend yield and then adjusts that yield for 1/2 the average projected growth rate in EPS, which is calculated by averaging the 5 year projected growth rate to the adjust of the scale by averaging the 5 year projected growth rate to the adjust of the scale by averaging the start and the adding that growth rate to the adjusted dividend yield.

Source of Information:

Value Line Investment Survey: www.reuters.com Downloaded on 02/05/2014 www.zacks.com Downloaded on 02/05/2014 www.yahoo.com Downloaded on 02/05/2014

United Water Rhode Island, Inc. Indicated Common Equity Cost Rate Through Use of a Risk Premium Model Using an Adjusted Total Market Approach

Line No.		Proxy Group of Twenty-Seven Non- Price-Regulated Companies		
1.	Prospective Yield on Baa Rated Corporate Bonds (1)	6.01 %		
2.	Equity Risk Premium (2)	4.31		
3.	Risk Premium Derived Common Equity Cost Rate	<u> </u>		

Notes: (1) Average forecast based upon estimates of Baa rated corporate bonds per the consensus of nearly 50 economists reported in Blue Chip Financial Forecasts dated December 1, 2013 and February 1, 2014 (see pages 19 and 20 of this Schedule). The estimates are detailed below.

First Quarter 2014	5.40	%
Second Quarter 2014	5.60	
Third Quarter 2014	5.70	
Fourth Quarter 2014	5.80	
First Quarter 2015	5.90	
Second Quarter 2015	6.00	
2015-2019	6.70	
2020-2024	7.00	
Average	6.01	%

(2) From page 31 of this Schedule.

United Water Rhode Island, Inc. Comparison of Bond Ratings for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

	N Boi Feb	/loody's nd Rating ruary 2014	Standard & Poor's Bond Rating February 2014					
Proxy Group of Twenty-Seven Non-Price-Regulated Companies	Bond Rating	Numerical Weighting (1)	Bond Rating	Numerical Weighting (1)				
Gallagher (Arthur J.)	NA		NA					
Baxter Intl Inc.	A3	10.0	А	6.0				
Bristol-Myers Squibb	A2	6.0	A+	5.0				
Brown & Brown	NA		NA					
ConAgra Foods	Baa2	9.0	BB+	11.0				
Capitol Fed. Finl	NA	16.0	NA					
Quest Diagnostics	Baa2	9.0	BBB+	8.0				
Dun & Bradstreet	NA		NA					
DaVita HealthCare	Ba3	13.0	В	15.0				
Haemonetics Corp.	NA		NA					
Kroger Co.	Baa2	9.0	BBB	9.0				
Lancaster Colony	NA		NA					
McKesson Corp.	Baa2	9.0	A-	7.0				
Mercury General	NA		NA					
Mead Johnson Nutrition	NA		BBB-	10.0				
Annaly Capital Mgmt.	NA		NA					
Northwest Bancshares	NA		NA					
Owens & Minor	Ba1	11.0	BBB	9.0				
Peoples United Finl	A3	7.0	BBB+	8.0				
Sherwin-Williams	A3	7.0	А	6.0				
Smucker (J.M.)	A3	7.0	NA					
Silgan Holdings	Ba1	11.0	BB-	13.0				
Suburban Propane	Ba2	12.0	BB-	13.0				
Stericycle Inc.	NA		NA					
Waste Connections	NA		NA					
Weis Markets	NA		NA					
Berkley (W.R.)	Baa2	9.0	BBB+	8.0				
Average	Baa2	9.7	BBB	9.1				

Notes:

(1) From Schedule PMA-7, page 5 of Ms. Ahern's Direct Testimony.

Source of Information: Standard & Poor's Bond Guide January 2014 www.moodys.com; downloaded 2/5/2014

United Water Rhode Island, Inc. Derivation of Equity Risk Premium Based on the Total Market Approach Using the Beta for the Proxy Group of Non-Price-Regulated Companies <u>Proxy Group of Nine Water Companies</u>

Line No.		Proxy Group of Twenty-Seven No Price-Regulated Companies	on- I
	Based on SBBI Valuation Yearbook Data:		
1.	Ibbotson Equity Risk Premium (1)	5.60	%
2.	Ibbotson Equity Risk Premium based on PRPM [™] (2)	9.33	
	Based on Value Line Summary and Index:		
3.	Equity Risk Premium Based on <u>Value Line</u> Summary and Index (3)	3.55	
4.	Conclusion of Equity Risk Premium (4)	6.16	%
5.	Adjusted Value Line Beta (5)	0.70	
6.	Forecasted Equity Risk Premium	4.31	%

- Notes: (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2013 Valuation Yearbook Market Results for Stocks, Bonds, Bills, and Inflation minus the arithmetic mean monthly yield of Moody's Aaa and Aa corporate bonds from 1926 2012. (11.83% 6.23% = 5.60%).
 - (2) The Predictive Risk Premium Model (PRPM[™]) is discussed in Ms. Ahern's accompanying direct testimony. The lbbotson equity risk premium based on the PRPM[™] is derived by applying the PRPM[™] to the monthly risk premiums between lbbotson large company common stock monthly returns minus the average Aaa and Aa corporate monthly bond yields, from January 1928 through December 2013.
 - (3) From page 18 of this schedule.
 - (4) Average of Lines 1, 2, & 3. Average of Lines 1, 2, & 3.
 - (5) Median beta derived from page 32 of this Schedule.

Sources of Information:

Ibbotson® SBBI® 2013 Valuation Yearbook - Market Results for Stocks, Bonds, Bills, and Inflation, Morningstar, Inc., 2013 Chicago, IL.

Value Line Summary and Index Blue Chip Financial Forecasts, December 1,2013 and February 1, 2014

United Water Rhode Island, Inc. Traditional CAPM and ECAPM Results for the Proxy Group of Non-Price-Regulated Companies Comparable in Total Risk to the Proxy Group of Nine Water Companies

Proxy Group of Twenty- Seven Non-Price-Regulated Companies	Value Line Adjusted Beta	Market Risk Premium (1)	Risk-Free Rate (2)	Traditional CAPM Cost Rate (3)	ECAPM Cost Rate (4)	Indicated Common Equity Cost Rate (5)
Gallagher (Arthur J.)	0.75	7.09 %	4.44 %	9.76 %	10.20 %	
Baxter Intl Inc.	0.70	7.09	4.44	9.40	9.93	
Bristol-Myers Squibb	0.70	7.09	4.44	9.40	9.93	
Brown & Brown	0.75	7.09	4.44	9.76	10.20	
ConAgra Foods	0.65	7.09	4.44	9.05	9.67	
Capitol Fed. Finl	0.60	7.09	4.44	8.69	9.40	
Quest Diagnostics	0.75	7.09	4.44	9.76	10.20	
Dun & Bradstreet	0.75	7.09	4.44	9.76	10.20	
DaVita HealthCare	0.65	0.00	4.44	4.44	4.44	
Haemonetics Corp.	0.65	0.00	4.44	4.44	4.44	
Kroger Co.	0.60	0.00	4.44	4.44	4.44	
Lancaster Colony	0.70	0.00	4.44	4.44	4.44	
McKesson Corp.	0.75	0.00	4.44	4.44	4.44	
Mercury General	0.70	7.09	4.44	9.40	9.93	
Mead Johnson Nutrition	0.65	7.09	4.44	9.05	9.67	
Annaly Capital Mgmt.	0.65	7.09	4.44	9.05	9.67	
Northwest Bancshares	0.75	7.09	4.44	9.76	10.20	
Owens & Minor	0.70	7.09	4.44	9.40	9.93	
Peoples United Finl	0.65	7.09	4.44	9.05	9.67	
Sherwin-Williams	0.70	7.09	4.44	9.40	9.93	
Smucker (J.M.)	0.70	7.09	4.44	9.40	9.93	
Silgan Holdings	0.75	7.09	4.44	9.76	10.20	
Suburban Propane	0.70	7.09	4.44	9.40	9.93	
Stericycle Inc.	0.70	7.09	4.44	9.40	9.93	
Waste Connections	0.70	7.09	4.44	9.40	9.93	
Weis Markets	0.65	7.09	4.44	9.05	9.67	
Berkley (W.R.)	0.70	7.09	4.44	9.40	9.93	
Average	0.69			<u>8.47</u> %	<u> </u>	<u> </u>
Median	0.70			9.40 %	9.93 %	9.67 %

Notes:

(1) From page 23, note 1 of this Schedule.

(2) From page 23, note 2 of this Schedule.

(3) Derived from the model shown on page 23, note 3 of this Schedule.

(4) Derived from the model shown on page 23, note 4 of this Schedule.

(5) Average of CAPM and ECAPM cost rates.

	Ibbotson Asse	Derivation of iates' Size Prer	Investment F mia for the D	kisk Adjustment Based ecile Portfolios of the I	ł upon NYSE/AMEX/NASDAQ		
			-1		N	୯୦	41
Line No.		Market Ca (millior	apitalization c 2014 (1) ns)	on February 4, titmes larger)	Applicable Decile of the NYSE/AMEX/ NASDAQ (2)	Applicable Size Premium (3)	Spread from Applicable Size Premium for (4)
÷	United Water Rhode Island, Inc.			<u>`</u>			
	a. Based Upon the Proxy Group of Nine Water Companies	\$	2.184		10	6.03%	
	b. Based Upon Mr. Kahal's Water Proxy Group	\$	2.627		10	6.03%	
5	Proxy Group of Nine Water Companies	\$ 1,68	0.289	137.9 x	Q	1.72%	4.31%
ы	Mr. Kahal's Proxy Group	\$ 1,86	8.672	148.0 x	5 - 6	1.70%	4.33%
		(A)		(B)	(C)	(D)	(E)
		Deci	٩	Number of Companies (millions)	Recent Total Market Capitalization (millions)	Recent Average Market Capitalization (millions)	Size Premium (Return in Excess of CAPM) (2)
	Larges		7 7	173 193	<pre>\$ 10,255,341.469 2,219,118.548</pre>	\$ 59,279.430 \$ 11,498.024	-0.37% 0.76%
			ω4	187 202	1,072,861.025 695,897.336	\$ 5,737.225 \$ 3,445.036	0.92% 1.14%
			o D	205 234	473,139.390 377,485.205	\$ 2,307.997 \$ 1,613.185	1.70% 1.72%
			~ ∘	317	329,504.738	\$ 1,039.447 \$ 650.712	1.73%
			0 0	329 466	z 14,004.230 166,708.095	\$ 357.743	2.70%
	Smalles		10	1068	107,517.520 *	\$ 100.672 From Ibbotson 2013	6.03% Yearbook
	Notes	(1) From Pag	je 34 of this §	Schedule.			Page
		(2) Gleaned 1 market ca(3) Correspor(4) Line No.example	from Columr pitalization o nding risk pre 1a Column 3 the 4.31% in	 (D) on the bottom of the proxy group, whit amium to the decile is 3 - Line No. 2 Colum Column 4 1 ine No. 3 	f this page. The appropria ch is found in Column 1. provided on Column (E) on n 3 and Line No. 1b, Colu 2 is derived as follows 4.310	te decile (Column (/ the bottom of this pa mn 3 - Line No. 3 6 = 6 03% - 1 72%	()) corresponds to the EE ge. f Column 3 etc For
		(decomposite					

United Water Rhode Island, Inc.

Exhibit No.___ Schedule PMA-8 Rebuttal Page 33 of 34

United Water Rhode Island, Inc. Market Capitalization of United Water Rhode Island, Inc. and the Proxy Group of Nine Water Companies	
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	Commor Outstan Company Exchange Year (n	d Water Rhode Island, Inc.	d Upon the Proxy Group of Nine Water panies	d Upon Mr. Kahal's Water Proxy Group	r Group of Nine Water Companies	ican States Water Co.	can Water Works Co., Inc.	America, Inc.	an Resources Corp.	mia Water Service Group	ecticut Water Service, Inc.	sex Water Company	Corporation	Water Company	jā	ge of Mr. Kahal's Water Proxy Group
-	n Stock Shares Iding at Fiscal r End 2012 millions)	NA				38.474	176.988	175.209	7.838	41.908	10.939	15.795	18.671	12.919	55.416	61.363
2	Book Valu Share at F Year End 2					÷	ŝ	¢	¢	ŝ	÷	÷	ŝ	ф	ŝ	¢
	ie per ∹iscal 012 (1)	NA				11.815	25.115	7.909	15.078	11.304	17.014	11.499	14.708	7.727	13.574	13.386
со і	Total Commo Fiscal Year (milli	÷				\$	÷	\$	\$	÷	\$	\$	÷	ф	\$	\$
	on Equity at End 2012 ons)	5.915 (4)				454.579	4,444.988	1,385.704	118.180	473.712	186.121	181.632	274.604	99.825	846.594	937.646
41	Closing St Market Pric February 04					\$	\$	\$	\$	\$	°°	\$	\$	\$	\$ 20	\$ 2(
	r cock ce on . 2014	NA	I	I		7.740	1.760	3.370	2.100	2.590	2.620	9.670	8.160	9.850	6.429	6.970
12	Market-to-Book Ratio on February 04, 2014 (2)		206.0 % (5)	213.5 % (7)		234.8 %	166.3	295.5	146.6	199.8	191.7	171.1	191.5	256.9	206.0 %	213.450 %
	Ma Capitali Febru 201 (mil		θ	θ		\$ T	\$	\$	ŝ	ь	ь	ь	ь	ф	\$	\$
<u>0</u>	arket zation on lary 04, 4 (3) lions)		12.184 (6)	12.627 (8)		,067.281	,391.019	,094.636	173.222	946.707	356.846	310.688	525.763	256.435	,680.289	,868.672

NA= Not Available

(1) Contest (1) Contest (1) Contest (1) Contest (2) Co

Column 3 / Column 1. Column 4 / Column 2. Column 5 * Column 3. Total capitalization of United Water Rhode Island multiplied by the recommended common equity ratio (11.065M x 53.45% = 5.915M). The market-to-book ratio of United Water Rhode Island, Inc. on February 04, 2014 is assumed to be equal to the market-to-book ratio of the Proxy Group of Nine Water Companies at February 04, 2014. United Water Rhode Island, Inc.'s common stock, if traded, would trade at a market-to-book ratio equal to the average market-to-book ratio at February 04, 2014 of the Proxy Group of Nine Water Companies, 206%, and United Water Rhode Island, Inc.'s market capitalization on February 04, 2014 would therefore have been \$12.184 million.

The market-to-book ratio of United Water Rhode Island, Inc. on February 04, 2014 is assumed to be equal to the market-to-book ratio of the Mr. Kahal's Water Proxy Group at February 04, 2014. Ē

United Water Rhode Island, Inc.'s common stock, if traded, would trade at a market-to-book ratio equal to the average market-to-book ratio at February 04, 2014 of the Mr. Kahal's Water Proxy Group, 213.5%, and United Water Rhode Island, Inc.'s market capitalization on February 04, 2014 would therefore have been \$12.627 million. 8

Source of Information: 2012 Annual Forms 10K yahoo.finance.com