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August 31, 2012

Via Email

Ms. Erica Hamilton
Commission Secretary
BC Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC V6Z 2N3

Dear Ms. Hamilton:

Re: Generic Cost of Capital Proceeding Order No. G-20-12 (Project No. 3698659)

In accordance with the amended regulatory timetable established by Order G-84-12, the Industrial Customers Group (ICG) of FortisBC Inc. encloses Information Request No. 1 regarding the following evidence:

Ms. McShane, Testimony on the Cost of Capital for FBCU
Concentric Energy Advisors Report
Evidence of Aaron Engen
Evidence of Dr. James H. Vander Weide

Yours truly,

(original signed)

Robert Hobbs

Enclosures

Industrial Customers Group
Information Request re: FortisBC Utilities
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1. Reference: McShane, *Testimony on the Cost of Capital for the Fortis BC Utilities*,

Rationale: Ms. McShane states that “Satisfying the comparable return requirement of the fair return standard requires consideration of returns available to comparable utilities in the U.S., given the similarity of operating and regulatory environments.”

Request:

- (a) Explain the basis for Ms. McShane’s belief that the operating and regulatory environments for the U.S. and Canada are similar.
- (b) Is Ms. McShane aware of any differences in the operating and regulatory environments? If so, please indicate what they are.

2. Reference: McShane, *Testimony on the Cost of Capital for the Fortis BC Utilities*,

Rationale: Ms. McShane includes several charts in her testimony: Chart 1 (p. 20), Chart 2 (p. 20), Chart 3 (p. 21), Chart 4 (p. 27), and Chart 5 (p. 51).

Rationale: Please provide the data underlying the five charts in electronic format (Excel spreadsheet). If there are calculations involved in constructing the charts, please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

3. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Appendix A, Chart A-1, A-2, p. 10.

Request: Please provide the data underlying the referred to charts in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

4. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 1.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

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5. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 2.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

6. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 3.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

7. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 4.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

8. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 5.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

9. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 6.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

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10. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 7.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

11. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 8.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

12. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 9.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

13. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 10.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

14. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 11.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

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15. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 12.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

16. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 13.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

17. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 14.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

(a) On p. 1 of Schedule 14, Ms. McShane provides raw betas based on monthly prices for selected Canadian regulated utilities. What type of monthly prices are used in the calculation? For example, are the monthly prices used in the beta calculation the prices for a specific day, such as the beginning or end of month price, or are they an average of the daily closing prices for the month? Please explain.

(b) Similarly, on p. 3 Schedule 14, Ms. McShane provides raw betas based on weekly prices. As in 16(a) above, what type of weekly prices are used in the calculation? Please explain.

18. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 17, page 1 of 2.

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Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

19. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 17, page 2 of 2.

Request: Please provide the data used to generate the three regressions referred to in the schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

20. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 18, schedules 2 and 3.

Request: Please provide the data underlying the graphs contained in the referenced schedules in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

21. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 18, schedule 1.

Request: Please provide the data used to generate the averages and returns given in the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

22. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 19.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

23. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 20.

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Request:

- (a) Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.
- (b) Please provide the source documents for the data given in columns (4) (“Forecast Return on Common Equity”) and (5) (Forecast Earnings Retention Rate).
- (c) Please provide the source data used to derive the entries for column (7) in electronic format (Excel spreadsheet). Please include within the spreadsheet any formulas used to make the calculations.

24. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 21.

Request:

- (a) Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.
- (b) Please provide the underlying source documents for the data presented in Schedule 21.

25. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 22.

Request:

- (a) Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.
- (b) Please provide the underlying source documents for the data presented in Schedule 22.

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26. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 23.

Request:

- (a) Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.
- (b) Please provide the underlying source documents for the data presented in Schedule 23.

27. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 24.

Request:

- (a) Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.
- (b) Please provide the underlying source documents for the data presented in Schedule 24.

28. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 25.

Request:

- (a) Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.
- (b) Please provide the underlying source data for the calculations made to derive the data presented in Schedule 25.

29. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 26.

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Request:

- (a) Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.
- (b) Please provide the underlying source documents for the data presented in Schedule 26.

30. Reference: McShane, *Testimony on the Cost of Capital for the FortisBC Utilities*, Schedule 1.

Request: Please provide the data comprising the referred to schedule in electronic format (Excel spreadsheet). Please provide the spreadsheet in such a format that any formulas used to derive any of the calculations are preserved.

Industrial Customers Group
Information Request re: Evidence of Concentric Energy Advisors Inc.
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1. Reference: 2010 Concentric Energy Advisors Report, p. 13, Table 1

Rationale: ICG would like to examine the data.

Request: Please provide in electronic form the data used in the statistical analyses summarized in Table 1. Please also send any updates or additions to this data as used in the analyses for the 2012 Report.

2. Reference: 2010 Concentric Energy Advisors Report, p. 23, Figure 4, Historical Backcast of ROE Adjustment Mechanisms – Year-Over-Year Adjustment; p. 28, Table 3, Descriptive Statistics of Formulae Input

Describes formula inputs for Concentric’s testing of various adjustment mechanism formulae.

Rationale: ICG would like to examine the data.

Request: Please provide in electronic format the data described in Table 3 and used to construct Figure 4. Please also send any updates or additions to this data as used in the analyses for the 2012 Report.

3. Reference: 2012 Concentric Energy Advisors Report, p. 1

“Based on our analysis and assessment of those options, we conclude that all formulaic approaches run the risk of deviation from a fair return.... Consequently, periodic rate hearings remain the only reliable method for determination of utility ROEs.”

Rationale: Consideration of some combination of formulaic approach with periodic hearings.

Request: Has Concentric considered some combination of using a formulaic approach in conjunction with, possibly less frequent, periodic hearings? What is Concentric’s opinion on this?

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1. Reference: Evidence of Aaron Engen, pp. 8:20 – 9:4

“Although spreads have seen a strong recovery from their 2008-2009 financial crisis highs, they remain high relative to historic levels. Despite good current market conditions, the average Canadian utilities group¹ 30-year spreads are wider (177 bps) than they were at the time of the 2009 Proceedings (163 bps). Investor appetite for risk in the debt capital market has generally diminished leading to an overall upward re-pricing of risk. Benchmark Government of Canada bond rates are expected to rise over the coming years with little room for the increase to be offset by corporate spread tightening.”

Rationale: Engen discusses the changes in the utilities spreads, but doesn't explain how this might relate to the current issue of cost of capital and future changes in such.

Request: Can Mr. Engen please explain how the conditions in the market stated above contribute to his opinion that FEI's requested return on equity of 10.5% on a deemed equity component of 40% is fair and reasonable? Does Mr. Engen expect this to still be true in the future as the market changes? If so, why? If not, how does Mr. Engen propose responses to such changes be built into the ROE adjustment formula?

2. Reference: Evidence of Aaron Engen, p. 9:8-10

“Some of the factors pushing Government of Canada bond yields to currently very low levels are the very same factors which would tend to put upward pressure on the cost of equity.”

Evidence of Aaron Engen, p. 26:10-12

“The falling trend in the S&P/TSX's P/E ratio over the past two years taken together with growth in corporate earnings during the same period as demonstrated in Figure 9, is compelling evidence that the cost of equity in Canada has been rising.

Rationale: Mr. Engen suggests that cost of equity will change, but does not discuss how this might be addressed.

Request: If the cost of equity increases as trends seem to suggest they will, would Mr. Engen still feel that FEI's requested return on equity is fair and reasonable? How does Mr. Engen propose adjustments to the formula (or formulae) be made in the face of such changes, if at all?

¹Comprised of FEI, Gaz Métro, TransCanada, Enbridge, Emera, and CU.

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3. Reference: Evidence of Aaron Engen, pp. 51:17-52:3

“When considering ROEs stemming from an acquisition of regulated assets buyers generally include some or all of the following strategic factors in supporting acquisition prices including: geographic diversification; establishing a strategic foothold in a new market; and protecting the buyer’s regulated asset franchise”

Evidence of Aaron Engen, pp. 52:29-53:13 – Mr. Engen discusses further buyer considerations.

Rationale: Mr. Engen lists these considerations, but does not discuss how they might be addressed within the proposed cost of capital methodology.

Request: How does MR. Engen propose accounting for these factors in the ROE adjustment formulae?

4. Reference: Evidence of Aaron Engen, pp. 67:16-68:2

“In light of Canadian current and prospective capital market conditions, market required returns on capital for energy infrastructure assets, and opportunities for investments of comparable risk at attractive rates of return in Canada, the U.S. and elsewhere, I believe FEI’s requested return on equity of 10.5% on a deemed equity component of 40% is consistent with current capital market conditions, which would be viewed by the financial market as more representative of FEI’s true cost capital, and would be fair and reasonable in the context of such conditions.”

Rationale: Mr. Engen described various market conditions, investment returns, etc., but has not discussed how any of this directly relates to FEI’s requested ROE and deemed equity component.

Request: How do the capital market conditions, returns on capital, and opportunities for investment support FEI’s requested ROE of 10.5%, in particular? Would a different ROE or equity component also be considered fair and reasonable given the conditions? If conditions in the market, returns on capital, opportunities for investment change as forecasted, would the ROE requested by FEI remain fair and reasonable? How would Mr. Engen propose to adjust the ROE should conditions change?

5. Reference: Evidence of Aaron Engen,

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- p. 14, Figure 1, S&P/TSX Composite Index 10-Year Performance, January 1, 2002 to July 4, 2012
- p. 17, Figure 2, Investor Confidence, January 2002 to June 2012.
- p. 19, Figure 3, VIXC Index Performance, October 1, 2009 to July 4, 2012
- p. 20, Figure 4, VIX Index Performance, January 1, 2002 to July 4, 2012
- p. 21, Figure 5, S&P/TSX Volatility, January 1, 1977 to July 4, 2012
- p. 23, Figure 6, Canadian Equity Market Trading Volumes, January 1, 2002 to July 4, 2012
- p. 24, Figure 7, Quarterly Mutual Fund Flows, January 2007 to May 2012
- p. 26, Figure 8, S&P/TSX Composite Index Historical P/E Ratio, January 2002 to April 2012
- p. 27, Figure 9, Aggregate Cdn Quarterly Corporate B-Tax Earnings, January 2002 to March 2012
- p. 28, Figure 10, Earnings Yield – Gov’t Canada Bond Yield Spread, 1960 to June 2012
- p. 32, Figure 11, Canadian Generic ‘A’ Spreads, January 2, 2002 to July 6, 2012
- p. 33, Figure 12, Cdn Utilities Group 30-Year Spreads, January 2, 2002 to July 6, 2012
- p. 34, Figure 13, Average Cdn Utilities Group 30-Year Spreads, January 2, 2002 to July 6, 2012
- p. 35, Figure 14, 10-Year Generic BBB Spreads Less A Spreads, January 4, 2002 to July 6, 2012
- p. 36, Figure 15, Aggregate Cdn Corporate Bond Issuance, 2002 to 2011
- p. 42, Figure 17, Gov’t Canada Bond Yields, January 1, 2002 to July 4, 2012

Rationale: ICG would like to examine the data.

Request: Please provide in electronic format the data used to generate each of the above-listed figures. How do the data and trends reflected in each of these figures demonstrate, in Mr. Engen’s opinion, that FEI’s requested ROE is fair and reasonable?

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1. Reference: Evidence of Dr. James H. Vander Weide, PhD, p. 14, Q/A 37

Rationale: Dr. Vander Weide says that comparable companies must be publicly traded due to information availability. But most Canadian utilities are not publicly traded.

Request: Is Dr. Vander Weide aware of any studies that show publicly traded companies are comparable to companies without publicly-traded stock? Are there any key differences between publicly traded and not publicly traded companies that he is aware of? If so, how does he correct for such differences in his analyses?

2. Reference: Evidence of Dr. James H. Vander Weide, PhD, p. 15, Q/A 39

"I include both natural gas and electric utilities in my comparable risk groups to ensure that there is a sufficiently large group of companies to reliably estimate the cost of equity."

Rationale: Dr. Vander Weide notes that "regulated natural gas and electric utilities generally face similar risks."

Request: Are there any notable differences between natural gas utilities and electric utilities in terms of the levels of debt or equity? If so, how does Dr. Vander Weide account for such differences? If not, please explain why the two types of utilities are similar.

3. Reference: Evidence of Dr. James H. Vander Weide, PhD, p. 19, Q/A 51

In regard to the companies in the S&P/TSX utilities index, Dr. Vander Weide states, "The primary disadvantage is that six of the ten companies in this group do not have a significant percentage of assets devoted to regulated utility service, and the financial statements of two of the companies with a significant percentage of regulated assets reflect essentially the same information"

Rationale: Such a disadvantage may affect the comparability of the companies in the group.

Request: Given the disadvantage referenced above, please explain how the companies in the S&P/TSX are still comparable to a Canadian regulated natural gas utility

4. Reference: Evidence of Dr. James H. Vander Weide, PhD, p. 21, Q/A 59

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“Canadian utilities generally have greater financial risk than U.S. utilities because...they rely more heavily on debt financing than U.S. utilities”

Rationale: This may affect the comparability U.S. utilities to Canadian utilities.

Request: How does Dr. Vander Weide account for the difference in financial risk and in the amount of debt to equity between Canadian and U.S. utilities when using U.S. utilities in his group of comparable companies?

5. Reference: Evidence of Dr. James H. Vander Weide, PhD, p. 22, Q/A 64

“...I find no significant difference in allowed ROEs for utilities in different bond rating categories.”

Rationale: Dr. Vander Weide finds no significant difference in allowed ROEs for utilities in different bond rating categories, yet uses bond rating categories as a criterion in his selection of comparable companies.

Request: If a utility's allowed ROE does not significantly vary with its bond rating category, then why does Dr. Vander Weide restrict the comparables group to only companies at or above a particular bond rating? Did Dr. Vander Weide perform any statistical significance tests to determine that there was “no significant difference in allowed ROEs?” If yes, please provide the results of any significance tests performed. If no, please explain that basis for Dr. Vander Weide concluding that there is no significant difference.

6. Reference: Evidence of Dr. James H. Vander Weide, PhD, p. 24, A 67

Dr. Vander Weide cites the Board in stating they find that U.S. utilities can be comparable to Canadian utilities for estimating the cost of capital “...and that only an analytical framework in which to apply judgment and a system of weighting are needed...”

Rationale: The cite mentions that a "system of weighting" is needed.

Request: Does Dr. Vander Weide use a system of weighting in his estimations of the cost of capital where he uses U.S. utilities as proxies for Canadian utilities? If so, please describe his weighting system and/or provide the weights used in an electronic format.

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7. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 6, Summary of Discounted Cash Flow Analysis for Comprehensive Group of U.S. Utilities

Rationale: ICG would like to examine Dr. Vander Weide's calculations and underlying data.

Request: Please provide an electronic copy of Exhibit 6 and of the data used to perform the analysis. Please provide an electronic copy of the spreadsheet, or program code, used to conduct the analysis summarized in Exhibit 6.

8. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 7, Summary of Discounted Cash Flow Analysis for Smaller Group of U.S. Utilities with Mostly Regulated Assets and S&P Bond Rating Equal to or Greater Than BBB

Rationale: ICG would like to examine Dr. Vander Weide's calculations and underlying data.

Request: Please provide an electronic copy of Exhibit 7 and of the data used to perform the analysis. Please provide an electronic copy of the spreadsheet, or program code, used to conduct the analysis summarized in Exhibit 7.

9. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 8, Experienced Risk Premiums on S&P/TSX Canadian Utilities Stock Index 1956-2011.

Rationale: ICG would like an electronic copy of the data.

Request: Please provide an electronic copy of Exhibit 8.

10. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 9, Experienced Risk Premiums on BMO Capital Markets Utilities Stock Data Set 1983-2011.

Rationale: ICG would like an electronic copy of the data.

Request: Please provide an electronic copy of Exhibit 9.

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11. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 10, Comparison of DCF Expected Return on an Investment in Electric Utilities to the Interest Rate on Long-Term Government Bonds.

Rationale: ICG would like to examine Dr. Vander Weide's calculations and underlying data.

Request: Please provide an electronic copy of Exhibit 10 and of the data shown and the data used to estimate DCF. Please provide an electronic copy of the spreadsheet, or program code, used to conduct the estimation of quarterly DCF.

12. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 11, Comparison of DCF Expected Return on an Investment in Natural Gas Utilities to the Interest Rate on Long-Term Government Bonds.

Rationale: ICG would like to examine Dr. Vander Weide's calculations and underlying data.

Request: Please provide an electronic copy of Exhibit 11 and of the data shown and the data used to estimate DCF. Please provide an electronic copy of the spreadsheet, or program code, used to conduct the estimation of quarterly DCF.

13. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 12, Calculation of Capital Asset Pricing Model Cost of Equity Using SBBI 6.6 Percent Risk Premium and Value Line Betas for Proxy Utilities.

Rationale: ICG would like to examine the data used.

Request: Please provide electronic copies of the tables in Exhibit 12.

14. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 14, Comparison of Risk Premia on S&P500 and S&P Utilities 1937-2012

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 14.

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15. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 15, Comparison of Risk Premia on S&P TSX Composite, S&P TSX Utilities, and BMO Capital Markets Utility Group

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 15.

16. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 16, Allowed Returns on Equity, U.S. Electric Utilities 2010 - June 2012.

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 16.

17. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 17, Allowed Returns on Equity, U.S. Natural Gas Utilities 2010 - June 2011.

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 17.

18. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 18, Allowed Equity Ratios, U.S. Electric Utilities 2009 - 2011.

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 18.

19. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 19, Allowed Equity Ratios, U.S. Natural Gas Utilities 2009 - 2011.

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 19.

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20. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 20, Market Value Equity Ratios for Comprehensive Group of U.S. Utilities at May 2012.

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 20.

21. Reference: Evidence of Dr. James H. Vander Weide, PhD, Exhibit 21, Market Value Equity Ratios for Smaller Group of U.S. Utilities with Mostly Regulated Assets and S&P Bond Rating Equal To or Greater Than BBB.

Rationale: ICG would like to examine the data used.

Request: Please provide an electronic copy of the table in Exhibit 21.