

Exhibit No. ___ (DCP-11)
Docket No. UG-060256
Witness: David C. Parcell

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**CASCADE NATURAL GAS
CORPORATION,**

Respondent.

DOCKET NO. UG-060256

EXHIBIT TO TESTIMONY OF

DAVID C. PARCELL

(REVISED EXHIBIT NUMBER)

ON BEHALF OF

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*Comparison Companies
Rates of Return on Average Common Equity
Market to Book Ratios
(pp. 1 & 2)*

August 22, 2006

COMPARISON COMPANIES
RATES OF RETURN ON AVERAGE COMMON EQUITY

COMPANY	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	1992-2001 Average	2001-2005 Average	2006	2007	2008-2011
Value Line Natural Gas																			
AGL Resources	11.8%	11.0%	11.6%	13.1%	13.2%	12.7%	12.6%	7.9%	11.2%	12.7%	14.7%	15.3%	13.9%	13.3%	11.8%	14.0%	13.0%	12.5%	12.0%
Almos Energy	10.7%	12.7%	10.0%	12.2%	14.4%	12.3%	15.8%	8.7%	8.5%	11.1%	10.3%	11.2%	9.1%	9.1%	11.4%	10.2%	8.5%	9.0%	10.5%
Cascade Natural Gas	7.1%	11.0%	6.1%	8.2%	9.6%	8.2%	8.3%	12.1%	13.1%	13.5%	10.6%	8.5%	11.5%	7.8%	9.8%	10.4%	9.0%	9.0%	9.0%
Energen	12.8%	13.4%	13.9%	11.3%	11.9%	12.3%	11.4%	11.3%	14.3%	15.6%	12.4%	17.2%	17.0%	21.0%	12.8%	16.6%	23.5%	28.0%	19.5%
KeySpan	9.3%	11.5%	11.8%	11.4%	11.2%	11.4%	-8.3%	7.4%	10.3%	8.3%	13.3%	12.0%	10.3%	9.3%	8.8%	10.6%	8.0%	9.5%	9.5%
Laclede Group	9.9%	13.4%	11.5%	10.0%	14.0%	13.2%	11.0%	10.0%	9.1%	10.6%	7.8%	11.8%	11.2%	11.1%	11.3%	10.5%	12.0%	11.0%	12.0%
New Jersey Resources	12.1%	11.9%	13.0%	13.3%	13.8%	14.5%	14.8%	14.9%	15.1%	15.2%	15.9%	16.7%	15.8%	16.2%	13.8%	16.0%	16.0%	15.3%	14.5%
NICOOR	15.3%	15.3%	15.7%	14.8%	17.0%	18.9%	14.7%	15.7%	18.2%	18.8%	17.3%	12.4%	13.0%	12.8%	18.2%	14.9%	13.0%	12.5%	13.5%
Northwest Natural Gas	6.0%	13.7%	12.2%	11.4%	13.2%	11.2%	5.3%	10.1%	10.2%	10.3%	6.7%	9.2%	9.3%	10.1%	10.5%	9.5%	10.0%	10.5%	10.5%
Peoples Energy	11.9%	11.8%	11.7%	9.7%	15.6%	14.1%	10.9%	11.2%	12.4%	14.1%	12.3%	12.5%	9.4%	10.3%	12.3%	11.7%	9.0%	9.5%	14.5%
Piedmont Natural Gas	14.1%	13.8%	12.2%	12.3%	13.2%	13.8%	13.6%	12.1%	12.5%	12.0%	10.8%	12.2%	12.4%	11.6%	13.0%	11.8%	11.0%	11.5%	12.5%
South Jersey Industries	11.8%	11.0%	8.5%	11.4%	11.1%	11.9%	10.1%	15.6%	15.4%	15.3%	14.0%	13.1%	13.4%	13.2%	12.2%	13.8%	13.0%	13.0%	13.0%
Southwest Gas	5.1%	3.9%	7.5%	0.6%	1.7%	5.4%	10.4%	7.5%	7.3%	6.7%	6.6%	6.2%	8.6%	6.8%	5.6%	7.0%	8.5%	8.5%	9.5%
UGI	9.1%	3.2%	9.0%	4.9%	1.2%	12.9%	10.9%	13.4%	17.4%	22.7%	25.9%	21.9%	16.5%	19.5%	11.3%	21.3%	15.0%	15.5%	13.0%
WGL Holdings	12.5%	12.1%	12.6%	12.4%	15.0%	14.1%	11.3%	10.3%	11.8%	11.8%	7.1%	14.4%	11.8%	12.1%	12.4%	11.5%	10.0%	10.0%	11.0%
Average	10.6%	11.3%	11.1%	10.5%	12.3%	12.4%	10.4%	11.1%	12.5%	13.3%	12.5%	13.0%	12.2%	12.3%	11.5%	12.6%	12.0%	12.3%	12.3%
Composite															11.5%	12.8%			
Morin Electricity Distribution Companies																			
American Electric Power	11.1%	11.9%	12.0%	12.4%	13.2%	13.5%	11.3%	10.5%	4.1%	12.8%	12.3%	12.4%	12.7%	11.7%	11.3%	12.4%	11.0%	11.0%	11.0%
Ameren Corp.	12.7%	12.9%	13.7%	13.1%	12.5%	10.8%	12.7%	12.5%	14.5%	14.3%	10.8%	12.2%	10.0%	10.3%	13.0%	11.5%	9.5%	10.0%	9.5%
CenterPoint Energy	11.8%	12.7%	12.7%	10.8%	11.6%	10.2%	11.0%	10.3%	15.4%	7.5%	9.6%	26.1%	13.1%	17.2%	11.4%	14.7%	21.5%	21.0%	20.0%
CH Energy Group	11.0%	11.1%	10.7%	10.7%	11.3%	10.9%	10.4%	10.2%	10.5%	10.4%	7.0%	9.1%	8.7%	8.8%	10.7%	8.8%	6.0%	8.5%	8.5%
Consolidated Edison	12.0%	12.5%	13.5%	12.7%	12.2%	11.9%	11.9%	12.2%	10.7%	12.2%	11.5%	10.0%	8.0%	10.2%	12.2%	10.4%	9.5%	9.5%	9.5%
Constellation Energy	9.4%	10.4%	10.6%	10.3%	9.5%	10.2%	10.5%	10.8%	11.2%	9.3%	8.8%	11.4%	12.4%	12.4%	10.4%	11.2%	13.5%	16.0%	17.5%
Duquesne Light Holdings	12.4%	12.0%	12.5%	13.2%	13.2%	12.9%	13.1%	14.0%	8.0%	2.7%	18.2%	15.0%	15.8%	14.1%	11.4%	12.7%	10.0%	13.0%	14.0%
Energy East Corp.	10.7%	9.1%	10.3%	10.5%	10.1%	8.9%	11.2%	14.4%	15.1%	13.4%	9.3%	8.3%	9.1%	9.3%	11.5%	9.9%	8.5%	8.5%	8.5%
Exelon	10.9%	11.9%	13.2%	13.2%	13.0%	11.3%	10.8%	13.0%	13.3%	12.5%	10.4%	6.0%	10.8%	10.5%	12.3%	10.0%	13.0%	13.0%	11.6%
FirstEnergy Corp.	10.9%	11.9%	13.2%	13.2%	13.0%	11.3%	10.8%	13.0%	13.3%	12.5%	10.4%	6.0%	10.8%	10.5%	12.3%	10.0%	13.0%	13.0%	11.6%
NorthEast Utilities	12.8%	9.4%	12.6%	11.9%	0.1%	-8.2%	-2.3%	-7.3%	-1.3%	8.6%	6.4%	7.1%	5.1%	6.8%	3.6%	6.0%	7.5%	8.0%	10.0%
NSTAR	11.4%	11.9%	12.2%	10.2%	12.6%	12.6%	12.5%	11.4%	12.3%	13.4%	14.0%	13.9%	13.4%	13.1%	12.1%	13.6%	12.5%	13.0%	13.5%
PEPCO Holdings	10.6%	12.0%	10.8%	10.5%	11.7%	10.5%	11.3%	11.7%	8.9%	11.9%	9.8%	7.6%	8.3%	8.1%	11.0%	9.1%	8.5%	8.5%	10.0%
PPL Corp.	13.1%	13.2%	10.6%	12.1%	12.4%	11.7%	15.8%	17.9%	28.1%	27.0%	23.6%	23.1%	18.3%	16.8%	16.0%	21.8%	18.0%	17.0%	18.6%
Public Service Enter. Group	9.5%	13.1%	13.0%	12.3%	11.0%	10.8%	12.6%	15.4%	18.8%	19.9%	18.2%	12.8%	14.5%	13.5%	15.9%	14.0%	14.5%	13.0%	13.0%
SCANA Corp.	11.0%	13.5%	11.0%	11.5%	13.3%	11.7%	12.5%	7.8%	10.7%	10.7%	11.7%	12.4%	12.6%	12.4%	11.4%	12.0%	11.5%	11.5%	11.5%
Sempra Energy	14.3%	14.1%	13.6%	15.1%	14.9%	16.1%	9.5%	13.3%	16.5%	20.7%	16.4%	20.7%	15.7%	15.7%	14.7%	13.3%	13.5%	13.0%	12.5%
TXU Corp.	9.6%	10.7%	8.3%	10.9%	12.9%	10.4%	10.5%	10.8%	10.7%	10.4%	9.7%	12.0%	1.9%	NM	10.5%	8.5%	39.0%	31.0%	31.0%
Vectren Corp.	13.9%	13.9%	13.8%	13.5%	13.4%	13.6%	13.2%	10.9%	10.0%	8.8%	13.3%	11.8%	9.9%	12.3%	12.5%	11.2%	12.0%	12.0%	11.0%
Wisconsin Energy	11.4%	11.8%	10.5%	12.9%	11.5%	3.2%	10.0%	11.3%	6.4%	10.6%	12.8%	11.8%	9.0%	11.6%	10.0%	11.2%	10.5%	10.5%	11.0%
Average	11.5%	12.0%	11.9%	12.0%	11.6%	10.3%	11.0%	11.1%	11.7%	12.7%	12.9%	13.4%	11.6%	12.6%	11.6%	12.6%	12.3%	14.0%	13.7%
Composite															11.6%	12.8%			
Morin Natural Gas Utilities																			
AGL Resources	11.8%	11.0%	11.6%	13.1%	13.2%	12.7%	12.6%	7.9%	11.2%	12.7%	14.7%	15.3%	13.9%	13.3%	11.8%	14.0%	13.0%	12.5%	12.0%
Almos Energy	10.7%	12.7%	10.0%	12.2%	14.4%	12.3%	15.8%	8.7%	8.5%	11.1%	10.3%	11.2%	9.1%	9.1%	11.4%	10.2%	8.5%	9.0%	10.5%
KeySpan Corp.	12.8%	13.4%	13.9%	11.3%	11.2%	11.4%	-8.3%	7.4%	10.3%	8.3%	13.3%	12.0%	10.3%	8.3%	9.4%	10.6%	8.0%	9.5%	9.5%
Laclede Group	9.3%	11.5%	11.8%	11.4%	14.0%	13.2%	11.0%	10.0%	9.1%	10.6%	7.8%	11.8%	11.2%	11.1%	11.2%	10.5%	12.0%	11.0%	12.0%
New Jersey Resources	9.9%	13.4%	11.5%	10.0%	13.8%	14.5%	14.6%	14.9%	15.1%	15.2%	15.9%	16.7%	15.8%	16.2%	13.3%	16.0%	16.0%	15.5%	14.5%
Northwest Natural Gas	12.1%	11.9%	13.0%	13.3%	13.2%	11.2%	6.3%	10.1%	10.2%	10.3%	8.7%	9.2%	9.3%	10.1%	13.2%	9.5%	10.0%	10.5%	10.5%
Peoples Energy	15.3%	15.3%	15.7%	14.6%	15.6%	14.1%	10.9%	11.2%	12.4%	14.1%	12.3%	12.5%	9.4%	10.3%	13.9%	11.7%	9.0%	9.5%	14.5%
Piedmont Natural Gas	6.0%	13.7%	12.2%	11.4%	13.2%	13.8%	13.6%	12.1%	12.5%	12.0%	10.8%	12.2%	12.4%	11.8%	12.1%	11.8%	11.0%	11.5%	12.5%
South Jersey Industries	11.9%	11.8%	11.7%	9.7%	11.1%	11.9%	10.1%	15.6%	15.4%	15.3%	14.0%	13.1%	13.4%	13.2%	12.5%	13.8%	13.0%	13.0%	13.0%
Southwest Gas	14.1%	13.8%	12.2%	12.3%	1.7%	5.4%	10.4%	7.5%	7.3%	6.7%	6.6%	6.2%	8.6%	6.8%	5.6%	7.0%	8.5%	8.5%	9.5%
UGI Corp.	11.8%	11.0%	8.5%	11.4%	9.2%	12.9%	10.9%	13.4%	17.4%	22.7%	25.9%	21.9%	16.5%	19.5%	12.9%	21.3%	15.0%	15.5%	13.0%
WGL Corp.	5.1%	3.9%	7.5%	0.6%	15.0%	14.1%	11.3%	10.3%	11.9%	11.9%	7.1%	14.4%	11.8%	12.1%	9.2%	11.5%	10.0%	10.0%	11.0%
Mean	10.9%	12.0%	11.6%	10.9%	12.1%	12.3%	10.1%	10.6%	11.8%	12.6%	12.9%	13.0%	11.8%	11.9%	11.6%	12.3%	11.2%	11.4%	11.8%
Composite															11.6%	12.3%			

Source: Calculations made from data contained in Value Line Investment Survey.

**COMPARISON COMPANIES
 MARKET TO BOOK RATIOS**

COMPANY	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	1992-2001 Average	2001-2005 Average
Value Line Natural Gas																
AGL Resources	181%	195%	169%	172%	189%	183%	183%	169%	166%	184%	171%	168%	184%	191%	179%	184%
Atmos Energy	158%	194%	186%	196%	248%	241%	245%	216%	167%	170%	150%	152%	147%	145%	202%	153%
Cascade Natural Gas	172%	163%	156%	155%	156%	169%	165%	167%	162%	184%	185%	196%	204%	199%	157%	193%
Energyn	138%	171%	150%	145%	161%	186%	174%	147%	189%	215%	160%	194%	242%	319%	168%	226%
KeySpan	145%	167%	157%	155%	164%	170%	149%	124%	156%	172%	159%	153%	150%	148%	150%	159%
Laclede Group	159%	187%	178%	163%	168%	175%	174%	159%	141%	155%	149%	169%	179%	179%	166%	165%
New Jersey Resources	161%	185%	162%	179%	190%	226%	225%	224%	227%	224%	220%	244%	251%	275%	201%	243%
NICOR	179%	216%	195%	167%	220%	242%	260%	226%	227%	239%	199%	185%	210%	222%	219%	211%
Northwest Natural Gas	152%	176%	161%	146%	156%	173%	169%	141%	129%	133%	145%	144%	153%	172%	149%	149%
Peoples Energy	162%	175%	152%	153%	177%	178%	174%	169%	167%	176%	150%	175%	183%	181%	168%	173%
Piedmont Natural Gas	180%	214%	186%	182%	163%	217%	222%	213%	195%	199%	168%	211%	212%	208%	199%	203%
South Jersey Industries	154%	175%	141%	142%	146%	178%	209%	202%	196%	205%	185%	170%	195%	221%	175%	195%
Southwest Gas	81%	100%	103%	103%	121%	126%	139%	147%	120%	127%	123%	118%	127%	137%	117%	126%
UGI	187%	162%	161%	166%	196%	228%	222%	196%	244%	292%	318%	286%	240%	279%	205%	283%
WGL Holdings	173%	189%	165%	164%	178%	196%	197%	176%	177%	177%	152%	162%	175%	163%	180%	170%
Average	159%	179%	161%	161%	177%	193%	194%	178%	176%	190%	177%	163%	191%	204%	177%	189%
Composite															177%	189%
Morin Electricity Distribution Companies																
American Electric Power	143%	159%	143%	156%	175%	187%	191%	154%	147%	179%	138%	124%	155%	161%	164%	151%
Ameren Corp.	169%	188%	160%	170%	175%	174%	180%	167%	163%	173%	163%	152%	151%	171%	172%	166%
CenterPoint Energy	167%	163%	148%	140%	140%	129%	169%	163%	162%	179%	116%	142%	239%	329%	150%	200%
CH Energy Group	123%	133%	107%	112%	114%	135%	159%	133%	125%	141%	152%	147%	149%	148%	128%	147%
Consolidated Edison	141%	160%	129%	125%	127%	139%	166%	170%	129%	142%	144%	146%	143%	154%	144%	146%
Constellation Energy	128%	140%	127%	135%	142%	152%	164%	141%	193%	160%	110%	135%	157%	194%	148%	151%
Duquesne Light Holdings	137%	151%	130%	151%	163%	165%	167%	205%	255%	217%	219%	221%	240%	218%	177%	223%
Energy East Corp.	131%	143%	155%	96%	94%	106%	169%	186%	151%	131%	121%	119%	138%	141%	131%	130%
Exelon									119%	226%	191%	227%	280%	354%	256%	256%
FirstEnergy Corp.	137%	154%	131%	137%	137%	140%	166%	144%	124%	136%	131%	132%	154%	169%	141%	144%
Northeast Utilities	154%	149%	127%	124%	95%	64%	91%	113%	136%	129%	99%	95%	106%	116%	118%	109%
NSTAR	138%	154%	130%	130%	125%	146%	181%	166%	161%	170%	175%	189%	202%	149%	179%	179%
PEPCO Holdings	160%	162%	136%	138%	161%	151%	161%	166%	136%	124%	110%	103%	109%	122%	150%	144%
PPL Corp.	170%	181%	144%	138%	143%	128%	176%	232%	257%	352%	253%	239%	230%	256%	192%	267%
Public Service Enter. Group	138%	160%	131%	129%	128%	122%	164%	184%	201%	225%	176%	186%	191%	245%	158%	205%
SCANA Corp.	161%	168%	157%	166%	175%	164%	195%	145%	134%	135%	137%	158%	171%	176%	160%	156%
Sempra Energy	187%	200%	166%	167%	171%	178%	203%	173%	165%	180%	155%	172%	178%	186%	179%	174%
TXU Corp.	134%	153%	125%	132%	158%	134%	151%	135%	118%	141%	147%	115%	NM	NM	138%	134%
Vectren Corp.	199%	192%	157%	162%	171%	180%	209%	215%	180%	181%	174%	170%	175%	185%	185%	177%
Wisconsin Energy	178%	177%	160%	172%	169%	154%	185%	152%	119%	126%	129%	147%	155%	168%	159%	145%
Average	152%	164%	137%	141%	145%	145%	173%	165%	160%	172%	152%	156%	175%	195%	166%	169%
Composite															166%	170%
Morin Natural Gas Utilities																
AGL Resources	181%	195%	169%	172%	189%	183%	183%	169%	166%	184%	171%	168%	184%	191%	179%	184%
Atmos Energy	158%	194%	186%	196%	248%	241%	245%	216%	167%	170%	150%	152%	147%	145%	202%	153%
KeySpan Corp.	146%	167%	157%	155%	164%	170%	149%	124%	156%	172%	158%	158%	160%	148%	158%	159%
Laclede Group	158%	187%	178%	163%	168%	175%	174%	159%	141%	155%	145%	169%	179%	178%	166%	165%
New Jersey Resources	161%	185%	162%	179%	190%	226%	225%	224%	227%	224%	220%	244%	251%	275%	201%	243%
Northwest Natural Gas	152%	176%	161%	146%	156%	173%	169%	141%	129%	133%	145%	144%	153%	172%	155%	149%
Peoples Energy	162%	175%	152%	153%	177%	178%	174%	169%	167%	176%	150%	175%	183%	181%	168%	173%
Piedmont Natural Gas	180%	214%	186%	182%	163%	217%	222%	213%	195%	199%	168%	211%	212%	208%	199%	203%
South Jersey Industries	154%	175%	141%	142%	146%	178%	209%	202%	196%	205%	185%	170%	195%	221%	175%	195%
Southwest Gas	81%	100%	103%	103%	121%	126%	139%	147%	120%	127%	123%	118%	127%	137%	117%	126%
UGI Corp.	187%	162%	161%	166%	196%	228%	222%	196%	244%	292%	318%	286%	240%	279%	205%	283%
WGL Corp.	173%	189%	165%	164%	178%	196%	197%	176%	177%	177%	152%	162%	175%	183%	180%	170%
Mean	159%	177%	160%	160%	176%	192%	192%	178%	174%	185%	175%	161%	184%	193%	175%	184%
Composite															175%	184%

Source: Calculations made from data contained in Value Line Investment Survey.