Exhibit No. ___ (SGH-15)
Docket Nos. UE-060266/UG-060267

Witness: Stephen G. Hill

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.

Respondent.

DOCKET NO. UE-060266 DOCKET NO. UG-060267

EXHIBIT TO DIRECT TESTIMONY OF

STEPHEN G. HILL

ON BEHALF OF STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Modified Earnings Price Ratio Proof

July 25, 2006

PUGET SOUND ENERGY

PROOF

If market price exceeds book value, the market-to-book ratio is greater than 1.0, and the earnings-price ratio understates the cost of capital.

> MP = market price BV = book value i = cost of equity capital r = earned return E = earnings

1. At MP = BV,
$$i = r = \frac{E}{MP}$$
.

- 2. E = rBV
- 3. Then, $\frac{E}{MP} = \frac{rBV}{MP}$.
- 4. When BV < MP, i.e., $\frac{BV}{MP}$ <1, then,

a.
$$\frac{E}{MP} < r$$
, since $\frac{E}{MP} = \frac{rBV}{MP} < r$, because $\frac{BV}{MP} < 1$;

b.
$$i < r$$
, since at $\frac{BV}{MP} = 1$, $i = \frac{E}{MP} = \frac{rBV}{MP}$, but if $\frac{BV}{MP} < 1$, then $i < r$; and

c.
$$\frac{E}{MP}$$
 < i, since at $\frac{BV}{MP}$ = 1, i = $\frac{E}{MP}$ = $\frac{rBV}{MP}$, but if $\frac{BV}{MP}$ < 1, then $\frac{E}{MP}$ < i, because,

1)
$$\frac{BV}{MP}$$
 < 1, through MP increasing, and, if so, $\frac{E}{MP}$ decreases, therefore, $\frac{E}{MP}$ < i, or

2)
$$\frac{BV}{MP}$$
 < 1, through BV decreasing, and, if so, given E = rBV, $\frac{E}{MP}$ decreases, therefore, $\frac{E}{MP}$ < i.

5. Ergo, $\frac{E}{MP} < i < r$, the earnings-price ratio is lower than the cost of capital, which is lower than the earned return.