Exhibit No. ___(SGH-17) 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

Market-to-Book Ratio Analysis

July 25, 2006

PUGET SOUND ENERGY

MARKET-TO-BOOK RATIO ANALYSIS ELECTRIC UTILITIES

COMPANY		k	= R.O.E.(1-1 [200		+ g			MARKET-TO-BOOK COST OF EQUITY
CV	k= NMF	(1-	0.4065)/	1.22	+	4.00%	=	nmf
FE	k= 12.0%	(1-	0.4800)/	1.68	+	5.20%	=	8.91%
GMP	k= 09.5%	(1-	0.4909)/	1.26	+	5.00%	=	8.85%
PGN	k= 10.0%	(1-	0.2492)/	1.34	+	3.38%	=	9.00%
AEE	k= 09.5%	(1-	0.1937)/	1.56	+	4.64%	=	9.57%
CNL	k= 08.0%	(1-	0.2800)/	1.51	+	6.36%	=	10.16%
DPL	k= 24.5%	(1-	0.2857)/	4.50	+	6.50%	=	10.39%
EDE	k= 06.5%	(1-	-0.2190)/	1.47	+	4.79%		10.16%
ETR	k= 11.5%	(1-	0.5304)/	1.70	+	5.90%	=	9.07%
HE	k= 10.0%	(1-	0.1733)/	1.76	+	3.93%	=	8.63%
PNM	k= 08.5%	(1-	0.4788)/	1.27	+	6.17%	=	9.67%
PNW	k= 08.5%	(1-	0.3233)/	1.12	+	5.11%	=	10.24%
PSD	k= 08.0%	(1-	0.2857)/	1.15	+	5.13%	=	10.10%
UNS	k= 09.5%	(1-	0.5333)/	1.61	+	5.38%	=	<u>8.13%</u>
							AVERAGE	9.45%
						STANDA	ARD DEVIATION	0.64%

Note: Equity returns and retention ratios based on Value Line current year projections.

0.75%

PUGET SOUND ENERGY

MARKET-TO-BOOK RATIO ANALYSIS ELECTRIC UTILITIES

COMPANY			MARKET-TO-BOOK COST OF EQUITY			
CV	k= 11.0%	(1- 0.5282)/ 1.2	22 +	4.00%	=	8.25%
FE	k= 11.0%	(1- 0.4500)/ 1.0	68 +	5.20%	=	8.79%
GMP	k= 10.5%	(1- 0.3961)/ 1.2	26 +	5.00%	=	10.05%
PGN	k= 10.0%	(1- 0.2514)/ 1.3	34 +	3.38%	=	8.98%
AEE	k= 09.5%	(1- 0.2638)/ 1.5	56 +	4.64%	=	9.14%
CNL	k= 09.0%	(1- 0.4286)/ 1.5	51 +	6.36%	=	9.75%
DPL	k= 21.0%	(1- 0.3371)/ 4.5	50 +	6.50%	=	9.59%
EDE	k= 09.5%	(1- 0.1467)/ 1.4	47 +	4.79%	=	10.29%
ETR	k= 10.5%	(1- 0.4717)/ 1.	70 +	5.90%	=	9.15%
HE	k= 10.0%	(1- 0.2914)/ 1.	76 +	3.93%	=	7.96%
PNM	k= 08.5%	(1- 0.4211)/ 1.5	27 +	6.17%	=	10.06%
PNW	k= 09.0%	(1- 0.3155)/ 1.	12 +	5.11%	=	10.60%
PSD	k= 08.5%	(1- 0.3714)/ 1.	15 +	5.13%	=	9.77%
UNS	k= 08.5%	(1- 0.4051)/ 1.	61 +	5.38%	=	<u>8.52%</u>
·					AVERAGE	9.35%

STANDARD DEVIATION

Note: Equity returns and retention ratios based on Value Line three- to five-year projections.

PUGET SOUND ENERGY

MARKET-TO-BOOK RATIO ANALYSIS GAS DISTRIBUTORS

COMPANY		k =	= R.O.E.(1-b) [2006	, , ,	+ g		1	MARKET-TO-BOOK COST OF EQUITY
ATG	k= 12.5%	(1-,	0.4118)/	1.73	+	5.42%	=	9.67%
ATO	k= 09.0%	(1-	0.3189)/	1.27	+	5.31%	= .	10.14%
CGC	k= 08.0%	(1-	0.0400)/	1.60	+	4,38%	=	9.16%
LG	k= 13.0%	(1-	0.4043)/	1.87	+	5.66%	=	9.81%
NJR	k= 16.5%	(1-	0.4786)/	2.56	+	6.50%	=	9.86%
GAS	k= 12.5%	(1-	0.2250)/	2.11	+	3.75%	=	8.35%
NWN	k= 10.0%	(1-	0.3867)/	1.58	+	4.87%	=	8.75%
PGL	k= 11.0%	(1-	0.0311)/	1.75	+	3.86%	=	9.95%
PNY	k= 11.0%	(1-	0.2615)/	2.07	+	5.26%	=	9.19%
SJI	k= 12.5%	(1-	0.4973)/	1.86	+	6.69%	=	10.07%
swx	k= 08.0%	(1-	0.4710)/	1.45	+	6.44%	=	9.35%
WGL	k= 10.0%	(1-	0.2703)/	1.66	+	4.20%	=	<u>8.58%</u>
							AVERAGE	9.41%
						STANDA	RD DEVIATION	0.61%

Note: Equity returns and retention ratios based on Value Line current year projections.

PUGET SOUND ENERGY

MARKET-TO-BOOK RATIO ANALYSIS GAS DISTRIBUTORS

COMPANY		k = R.O.E.(1-b [2009-2	, .	s) + §			MARKET-TO-BOOK COST OF EQUITY
ATG	k= 12.0%	(1- 0.3966)/	1.73	+	5.42%	=	9.60%
ATO	k= 10.5%	(1- 0.4600)/	1.27	+	5.31%	=	9.78%
CGC	k= 08.5%	(1- 0.3677)/	1.60	+	4.38%	=	7.73%
LG	k= 13.0%	(1- 0.4643)/	1.87	+	5.66%	=	9.39%
NJR	k= 14.5%	(1- 0.4848)/	2.56	+	6.50%	=	9.42%
GAS	k= 13.0%	(1- 0.2786)/	2.11	+	3.75%	=	8.20%
NWN	k= 10.5%	(1- 0.4035)/	1.58	+	4.87%	=	8.83%
PGL	k= 13.5%	(1- 0.1704)/	1.75	+	3.86%	=	10.26%
PNY	k= 12.5%	(1- 0.3314)/	2.07	+	5.26%	=	9.30%
SJI	k= 13.0%	(1- 0.5000)/	1.86	+	6.69%	=	10.19%
SWX	k= 10.5%	(1- 0.6435)/	1.45	+	6.44%	=	9.01%
WGL	k= 11.0%	(1- 0.3958)/	1.66	+	4.20%	=	<u>8.19%</u>
						AVERAGE	9.16%
					STANDA	RD DEVIATION	0.80%

Note: Equity returns and retention ratios based on Value Line three- to five-year projections.