

Exhibit No. ___ (SGH-3)
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

Sustainable Long-Term Growth

July 25, 2006

SUSTAINABLE LONG-TERM GROWTH

Q. PLEASE PROVIDE AN EXAMPLE THAT DESCRIBES THE DETERMINANTS OF LONG-TERM SUSTAINABLE GROWTH.

A. Assume that a hypothetical regulated firm had a first period common equity or book value per share of \$10, the investor-expected return on that equity was 10% and the stated company policy was to pay out 60% of earnings in dividends. The first period earnings per share are expected to be \$1.00 (\$10/share book equity x 10% equity return) and the expected dividend is \$0.60. The amount of earnings not paid out to shareholders (\$0.40), the retained earnings, raises the book value of the equity to \$10.40 in the second period. The table below continues the hypothetical for a five-year period and illustrates the underlying determinants of growth.

TABLE A.

	<u>YEAR 1</u>	<u>YEAR 2</u>	<u>YEAR 3</u>	<u>YEAR 4</u>	<u>YEAR 5</u>	<u>GROWTH</u>
BOOK VALUE	\$10.00	\$10.40	\$10.82	\$11.25	\$11.70	4.00%
EQUITY RETURN	10%	10%	10%	10%	10%	-
EARNINGS/SH.	\$1.00	\$1.040	\$1.082	\$1.125	\$1.170	4.00%
PAYOUT RATIO	0.60	0.60	0.60	0.60	0.60	-
DIVIDENDS/SH.	\$0.60	\$0.624	\$0.649	\$0.675	\$0.702	4.00%

We see that under steady-state conditions, the earnings, dividends and book value all grow at the same rate. Moreover, the key to this growth is the amount of earnings retained or reinvested in the firm and the return on that new portion of equity. If we let “b” equal the retention ratio of the firm (1 – the payout ratio) and let “r” equal the firm’s expected return on equity, the DCF growth rate “g” (also referred to as the internal or sustainable growth rate) is equal to their product, or

$$g = br. \quad (i)$$

Professor Myron Gordon, who developed the Discounted Cash Flow technique and first

introduced it into the regulatory arena, has determined that Equation (i) embodies the underlying fundamentals of growth and, therefore, is a primary measure of growth to be used in the DCF model. Professor Gordon's research also indicates that analysts' growth rate projections are useful in estimating investors' expected sustainable growth.

I should note here that the above hypothetical does not allow for the existence of external sources of equity financing, i.e., sales of common stock. Stock financing will cause investors to expect additional growth if the company is expected to issue new shares at a market price that exceeds book value. The excess of market over book would inure to current shareholders, increasing their per share equity value. Therefore, if the company is expected to continue to issue stock at a price that exceeds book value, the shareholders would continue to expect their book value to increase and would add that growth expectation to that stemming from earnings retention or internal growth. Conversely, if a company were expected to issue new equity at a price below book value, that would have a negative effect on shareholder's current growth rate expectations. In such a situation, shareholders would perceive an overall growth rate less than that produced by internal sources (retained earnings). Finally, with little or no expected equity financing or a market-to-book ratio near unity, investors would expect the sustainable growth rate for the company to equal that derived from Equation (i), "g = br." Dr. Gordon¹ identifies the growth rate which includes both expected internal and external financing as:

$$g = br + vs, \quad (ii)$$

where,

g = DCF expected growth rate,
r = return on equity,
b = retention ratio,
v = fraction of new common stock
sold that accrues to the current
shareholder,

¹Gordon, M.J., The Cost of Capital to a Public Utility, MSU Public Utilities Studies, East Lansing, Michigan, 1974, pp., 30-33.

s = funds raised from the sale of stock
as a fraction of existing equity.

Additionally,

$$v = 1 - BV/MP, \quad (iii)$$

where,

MP = market price,
BV = book value.

I have used Equation (iii) as the basis for my examination of the investor expected long-term growth rate (g) in this proceeding.

Q. IN YOUR PREVIOUS EXAMPLE, EARNINGS AND DIVIDENDS GREW AT THE SAME RATE (br) AS DID BOOK VALUE. WOULD THE GROWTH RATE IN EARNINGS OR DIVIDENDS, THEREFORE, BE SUITABLE FOR DETERMINING THE DCF GROWTH RATE ?

A. No, not necessarily. Rates of growth derived from earnings or dividends alone can be unreliable due to extraneous influences on those parameters such as changes in the expected rate of return on common equity or changes in the payout ratio. That is why it is necessary to examine the underlying determinants of growth through the use of a sustainable growth rate analysis.

If we take the hypothetical example previously stated and assume that, in year three, the expected return on equity rises to 15%, the resultant growth rate for earnings and dividends far exceeds that which the company could sustain indefinitely. The potential error in using those growth rates to estimate "g" is illustrated in the following table.

TABLE B.

	<u>YEAR 1</u>	<u>YEAR 2</u>	<u>YEAR 3</u>	<u>YEAR 4</u>	<u>YEAR 5</u>	<u>GROWTH</u>
BOOK VALUE	\$10.00	\$10.40	\$10.82	\$11.47	\$12.157	5.00%
EQUITY RETURN	10%	10%	15%	15%	15%	10.67%
EARNINGS/SH.	\$1.00	\$1.040	\$1.623	\$1.720	\$1.824	16.20%
PAYOUT RATIO	0.60	0.60	0.60	0.60	0.60	-
DIVIDENDS/SH.	\$0.60	\$0.624	\$0.974	\$1.032	\$1.094	16.20%

What has happened is a shift in steady-state growth paths. For years one and two, the sustainable rate of growth ($g=br$) is 4.00%, just as in the previous hypothetical. Then, in the last three years, the sustainable growth rate increases to 6.00% ($g=br = 0.4 \times 15\%$). If the regulated firm were expected to continue to earn a 15% return on equity and retain 40% of its earnings, then a growth rate of 6.0% would be a reasonable estimate of the long-term sustainable growth rate. However, the compound annual growth rate for dividends and earnings exceeds 16% which is the result only of an increased equity return rather than the intrinsic ability of the firm to grow continuously at a 16% annual rate. Clearly, this type of estimate of future growth cannot be used with any reliability at all. In the case of the hypothetical, to utilize a 16% growth rate in a DCF model would be to expect the company's return on common equity to increase by 50% every five years into the indefinite future. This would be a ridiculous forecast for any regulated firm and underscores the importance of utilizing the underlying fundamentals of growth in the DCF model.

It can also be demonstrated that a change in our hypothetical regulated firm's payout ratio makes the past rate of growth in dividends an unreliable basis for predicting "g". If we assume our regulated firm consistently earns its expected equity return (10%) but in the third year, changes its payout ratio from 60% to 80% of earnings, the results are shown in the table below.

TABLE C.

	<u>YEAR 1</u>	<u>YEAR 2</u>	<u>YEAR 3</u>	<u>YEAR 4</u>	<u>YEAR 5</u>	<u>GROWTH</u>
BOOK VALUE	\$10.00	\$10.40	\$10.82	\$11.036	\$11.26	3.01%
EQUITY RETURN	10%	10%	10%	10%	10%	-
EARNINGS/SH.	\$1.00	\$1.040	\$1.082	\$1.104	\$1.126	3.01%
PAYOUT RATIO	0.60	0.60	0.80	0.80	0.80	7.46%
DIVIDENDS/SH.	\$0.60	\$0.624	\$0.866	\$0.833	\$0.900	10.67%

What we see here is that, although the company has registered a high dividend growth rate (10.67%), it is, again, not at all representative of the growth that could be sustained indefinitely, as called for in the DCF model. In actuality, the sustainable growth rate has declined from 4.0% the first two years to only 2.0% ($g=br = 0.2 \times 10\%$) during the last three years due to the increased payout ratio. To utilize a 10% growth rate in a DCF analysis of this hypothetical regulated firm would 1) assume the payout ratio of the firm would continue to increase 33% every five years into the indefinite future, 2) lead to the highly implausible result that the firm intends to consistently pay out more in dividends than it earns and 3) grossly overstate the cost of equity capital.