Exhibit SGH-12

PUGET SOUND ENERGY

CAPM COST OF EQUITY CAPITAL ELECTRIC UTILITIES

$$k = rf + B (rm - rf)$$

T-BONDS

 $[rf]^* = 4.20\%$ $[rm - rf]^{\dagger} = 3.9\% \text{ (geometric mean)}$ $[rm - rf]^{\dagger} = 5.6\% \text{ (arithmetic mean)}$ $[rm - rf]^{\dagger}^{\dagger} = 5.30\%$ average beta = 0.73

 $\begin{array}{l} k = 4.20\% + 0.73 \ (3.90\%/5.30\%/5.6\%) \\ k = 4.20\% + 2.84\%/3.85\%/4.29\% \\ k = 7.04\%/8.05\%/8.49\% \end{array}$

k(average) = 7.79%

*Current T-Bond yields, six-week average yield from Value Line Selection & Opinion (9/409-10/†Geometric and arithmetric market risk premiums from Morningstar 2009 Risk Premia Over Time †† Mid-point long- and short-term market risk premium from Brealey, R., Meyers, S., Allen, F., P1