THE STATE OF NEW HAMPSHIRE

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EXECUTIVE DIRECTOR AND SECRETARY Debra A. Howland-

Witness_

PUBLIC UTILITIES COMMISSION

21 S. Fruit Street, Suite 10 Concord, N.H. 03301-2429

February 3, 2009

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Debra A. Howland, Executive Director New Hampshire Public Utilities Commission 21 South Fruit Street, Suite 10 Concord, New Hampshire 03301-2429

> Re: DG 08-009 - EnergyNorth Natural Gas, Inc. d/b/a National Grid NH

Record Request Reserved as Exhibit 64

Dear Ms. Howland:

ORIGINAL

M.M.P.U.C. Gase Ho. DG-08-009

Exhibit No. #64

Attached please find a Record Request Reserved as Exhibit 64 for the above referenced docket.

Thank you for your attention, and please let me know if you have any questions.

Sincerely,

Edward N. Damon, Esq.

Edw-dh. Damon

Director, Legal Division

Attachments cc: Service List

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH DG 08-009

Record Request Reserved as Exhibit 64:

Describe the Staff's calculation of its point estimates and ranges of reasonable estimates for both its pre-filed direct testimony and its update provided at hearing.

Response:

See Attachments 1 (pre-filed direct testimony) and 2 (hearing update).

Attachment XI

| DCF ROE Estimates | | | |
|-------------------------|---|-----------|------------------|
| | | | |
| | Average of EDS DDS | | |
| Company | Average of EPS, DPS, and BPS growth rates | br and sv | EPS growth rates |
| Atmos Energy | 8.72% | 8.87% | 10.20% |
| Laclede Group | 7.96% | 13.37% | 9.29% |
| Nicor Inc. | 7.37% | 9.39% | 9.22% |
| Northwest Nat. Gas | 7.99% | 9.57% | 9.40% |
| Piedmont Natural Gas | 8.43% | 7.63% | 10.33% |
| Southwest Gas | 8.24% | 8.91% | 10.52% |
| WGL Holdings Inc. | 8.99% | 9.33% | 9.82% |
| Average | 8.24% | 9.58% | 9.82% |
| Average plus 2*SD | 9.31% | 13.16% | 10.89% |
| Average minus 2*SD | 7.17% | 6.00% | 8.76% |
| Cost of Equity estimate | 8.24% | 8.95% | 9.82% |

A shaded cell identifies an outlier (see the testimony for the criteria)

Average of the three estimates

9.01%

| Market to Book Ratio ROE Estimate | | | |
|-----------------------------------|-------------------------|--------------------|------------------|
| | | | Cost of equity: |
| Company | Internal cost of equity | external component | Mkt./Book method |
| Atmos Energy | 9.10% | 0.00% | 9.10% |
| Laclede Group | 7.63% | 5.23% | 12.86% |
| Nicor Inc. | 8.85% | 0.00% | 8.85% |
| Northwest Nat. Gas | 7.96% | 1.44% | 9.40% |
| Piedmont Natural Gas | 7.80% | -0.55% | |
| Southwest Gas | 8.73% | 0.24% | 8.97% |
| WGL Holdings Inc. | 8.85% | 0.12% | 8.98% |
| Average | | | 9.34% |
| Average plus 2*SD | | | 12.74% |
| Average minus 2*SD | | | 5.94% |
| Cost of Equity estimate | | | 8.76% |

A shaded cell identifies an outlier (see the testimony for the criteria)

As per the prefiled testimony

| Point Estimates | Method | Estimates |
|---------------------------|----------------------|----------------|
| Point Estimate 1 (Staff's | Average of the three | |
| preferred approach) | DCF ROE Estimates | 9.01% |
| | Average of the three | |
| | DCF ROE Estimates | |
| | and the Market to | |
| Point Estimate 2 | Book ROE Estimate | 8.94% |
| | | |
| | Average of the three | |
| | DCF ROE Estimates, | |
| | the Market to Book | |
| | Ratio ROE Estimate, | |
| · | CAPM Method 1 | |
| | estimate and CAPM | |
| Point Estimate 3 | Method 2 Estimate | 9.28% |
| Range of Reasonable | Based on the three | |
| Estimates | point estimates | 8.94% to 9.28% |

CAPM Method 1 CAPM Method 2 9.28%

10.64%

Attachment XI with updated numbers

| DCF ROE Estimates | | | |
|-------------------------|----------------------|-----------|------------------|
| | | | |
| | | | |
| | Average of EPS, DPS, | | |
| Company | and BPS growth rates | br and sv | EPS growth rates |
| Atmos Energy | 9.03% | 9.75% | 10.53% |
| Laclede Group | 8.11% | 12.42% | 9.44% |
| Nicor Inc. | 8.50% | 10.12% | 9.97% |
| Northwest Nat. Gas | 8.81% | 9.75% | 9.93% |
| Piedmont Natural Gas | 11.11% | 8.63% | 17.29% |
| Southwest Gas | 8.73% | 8.76% | 10.61% |
| WGL Holdings Inc. | 8.72% | 8.93% | 9.55% |
| Average | 9.00% | 9.77% | 11.05% |
| Average plus 2*SD | 10.95% | 12.37% | 16.62% |
| Average minus 2*SD | 7.05% | 7.16% | 5.47% |
| Cost of Equity estimate | 8.65% | 9.32% | 10.01% |

A shaded cell identifies an outlier (see the testimony for the criteria)

Average of the three estimates

9.33%

| Market to Book Ratio ROE Estimate | | | |
|-----------------------------------|-------------------------|--------------------|------------------|
| | | | Cost of equity: |
| Company | Internal cost of equity | external component | Mkt./Book method |
| Atmos Energy | 8.89% | 0.48% | 9.37% |
| Laclede Group | 8.06% | 4.14% | 12.20% |
| Nicor Inc. | 9.63% | 0.00% | 9.63% |
| Northwest Nat. Gas | 8.25% | 1.19% | 9.44% |
| Piedmont Natural Gas | 8.86% | -0.19% | 8.67% |
| Southwest Gas | 8.54% | 0.15% | 8.69% |
| WGL Holdings Inc. | 8.56% | 0.11% | 8.67% |
| Average | | | 9.52% |
| Average plus 2*SD | | | 12.02% |
| Average minus 2*SD | | | 7.03% |
| Cost of Equity estimate | | | 9.08% |

A shaded cell identifies an outlier (see the testimony for the criteria)

Updated numbers as reported in the hearings

| Point Estimates | Method | Estimates |
|---------------------------|----------------------|----------------|
| Point Estimate 1 (Staff's | Average of the three | |
| preferred approach) | DCF ROE Estimates | 9.33% |
| | Average of the three | |
| | DCF ROE Estimates | |
| · | and the Market to | |
| Point Estimate 2 | Book ROE Estimate | 9.26% |
| | | |
| | Average of the three | |
| | DCF ROE Estimates, | |
| | the Market to Book | |
| | Ratio ROE Estimate, | |
| | CAPM Method 1 | |
| | estimate and CAPM | |
| Point Estimate 3 | Method 2 Estimate | 8.77% |
| Range of Reasonable | Based on the three | _ |
| Estimates | point estimates | 8.77% to 9.33% |

CAPM Method 1 CAPM Method 2 7.08% 8.48% STEVEN V CAMERINO MCLANE LAW FIRM 11 SOUTH MAIN ST STE 500 CONCORD NH 03301 SARAH KNOWLTON MCLANE GRAF RAULERSON & MIDD PO BOX 459 PORTSMOUTH NH 03802-0459

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DEBRA A HOWLAND EXEC DIRECTOR & SECRETARY NHPUC 21 SOUTH FRUIT STREET, SUITE 10 CONCORD NH 03301-2429

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BULK MATERIALS:

Upon request, Staff may waive receipt of some of its multiple copies of bulk materials filed as data responses. Staff cannot waive other parties' right to receive bulk materials.

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