Q. Please explain in detail why Mr. Cicchetti has not presented traditional risk premium evidence or adjusted comparable earnings evidence in this application.

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A. Mr. Cicchetti has presented traditional risk premium evidence. Mr. Cicchetti believes ex post risk premium analyses based on earned returns and on allowed returns are not traditional risk premium analyses. Mr. Cicchetti believes the Comparable Earnings approach does not measure the required rate of return which is what is necessary in utility rate setting proceedings.