

1 **Q. Evidence of Ms. McShane Background Pages 4 – 6: Please provide Mr. Justice**  
2 **Lamont’s definition of a fair rate of return and confirm that it specifically refers to**  
3 **a rate of return on other securities of equal attractiveness, stability and certainty to**  
4 **that of the company’s enterprise?**  
5

6 **A.** The fair return was defined by the Court:  
7

8 "By a fair return is meant that the company will be allowed as large a return on  
9 the capital invested in its enterprise (which will be net to the company) as it  
10 would receive if it were investing the same amount in other securities possessing  
11 an attractiveness, stability and certainty equal to that of the company's enterprise."