

## **Cost of capital determination for electricity distribution businesses to apply to a customised price-quality path proposal [2013] NZCC 16**

**The Commission:** S Begg  
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**Date of determination:** 30 September 2013

## Executive summary

1. This determination specifies weighted average cost of capital (WACC) estimates to apply in respect of any customised price-quality path proposal by a supplier of Electricity Distribution Services (EDS) in the 12 months following the date of this decision.
2. Vanilla<sup>1</sup> WACCs have been estimated for inclusion in any CPP proposal made by an Electricity Distribution Business (EDB). The 75th percentile estimate of vanilla WACC for CPP periods of three years is 6.97%, of four years is 7.20% and of five years is 7.41%.
3. The WACC estimates are summarised in Table 1 below. The WACCs are estimated as at 1 September 2013.<sup>2</sup>

**Table 1: Summary of vanilla WACC estimates**

	Mid-point	75 <sup>th</sup> percentile
<b>Customised Price-quality path</b>		
Vanilla WACC (5 years)	6.69%	7.41%
Vanilla WACC (4 years)	6.48%	7.20%
Vanilla WACC (3 years)	6.26%	6.97%

<sup>1</sup> The vanilla WACC is a weighted average of the pre-corporate tax cost of debt and the cost of equity.

<sup>2</sup> The associated mid-point post-tax WACCs for five, four and three years are 5.93%, 5.76% and 5.56% respectively. The associated 75<sup>th</sup> percentile post-tax WACCs for five, four and three years are 6.65%, 6.47% and 6.28% respectively.

## Introduction

4. This determination specifies WACC estimates to apply in respect of any customised price-quality path proposal by an EDB in the 12 months following the date of this decision.
5. The WACC estimates are set pursuant to clause 5.3.28 of the EDS input methodology (IM) Determination.
6. The Commission has estimated a vanilla WACC. The vanilla WACC is a weighted average of the pre-corporate tax cost of debt and the cost of equity.
7. The parameter values, estimates and information sources used for each estimate of the WACC are set out in this determination. Additional commentary on the estimation of the risk-free rate and the debt premium is also provided.
8. For example, this determination identifies the issuers and bonds that were analysed (including the credit rating and remaining term to maturity) when estimating the debt premium. The commentary also explains which debt premium estimates were given greater weight than other estimates.

## Background

### Changes in the risk-free rate and debt premium over time

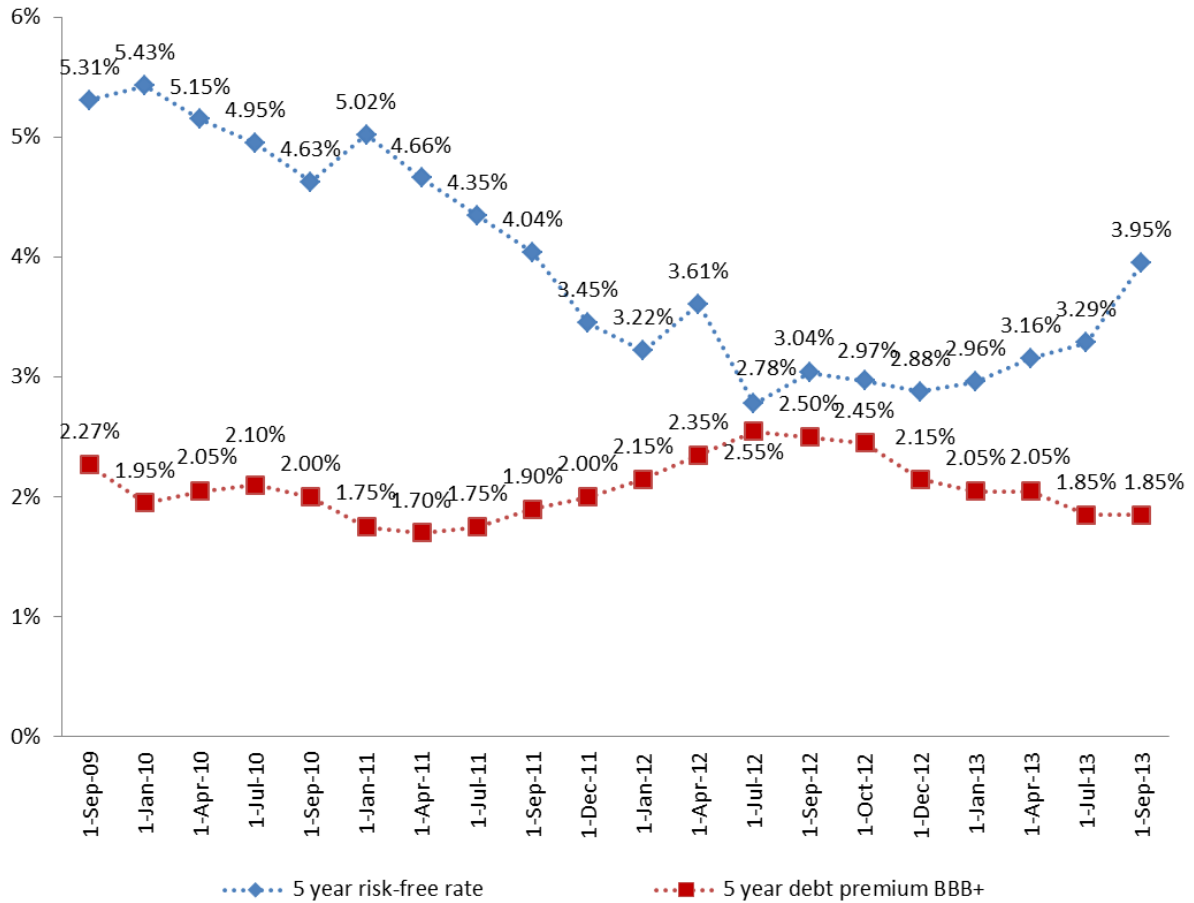
9. The cost of capital input methodologies for the regulated services reflect that both the risk-free rate<sup>3</sup> and the debt premium on bonds<sup>4</sup> change over time.
10. Changes in the risk-free rate and debt premium on bonds are illustrated below. Figure 1 shows, as at 1 September 2013, the changes over time in the:
  - 10.1 five year risk-free rate; and
  - 10.2 debt premium on bonds rated BBB+ with a term of five years.

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<sup>3</sup> The risk-free rate is estimated based on an interpolation of bid yields on New Zealand government stock to a term to maturity of five years, four years and three years.

<sup>4</sup> The debt premium is estimated on publicly traded corporate bonds according to the methodology specified in the EDS input methodology determinations.

**Figure 1: Changes in the risk-free rate and debt premium over time**



### Reasons for differences in WACC under the various cost of capital input methodologies determinations

11. Differences in the WACCs estimated under the various cost of capital input methodologies reflect differences in:
  - 11.1 the date of estimation for the WACCs, which results in different estimates of the risk-free rate and debt premium;
  - 11.2 the periods in which the WACCs will apply;
  - 11.3 the context in which the WACCs will be used (75th percentile estimates of the WACC are used when considering default and customised price-quality paths, while a midpoint and range is determined for information disclosure);
  - 11.4 the assessed risk of the various regulated services (EDBs and Transpower have an asset beta of 0.34, GPBs have an asset beta of 0.44 and Airports have an asset beta of 0.60); and
  - 11.5 the value of leverage for airports (17%) and for EDBs, GPBs, and Transpower (44%).

## WACC for EDB CPP proposals

12. Under clause 5.3.28 of the EDS IM Determinations, the Commission has determined a 75<sup>th</sup> percentile estimate of vanilla WACC of:
- 12.1 7.41% for a five year period;
  - 12.2 7.20% for a four year period; and
  - 12.3 6.97% for a three year period.

### Parameters used to estimate the WACC

13. These estimates of vanilla WACC reflect the parameters specified in the EDS IM Determination. The risk-free rate and debt premium are also estimated in accordance with the EDS IM Determination.

### Summary of parameters

14. The parameters used to estimate the WACCs are summarised in Table 2 below.

**Table 2: Parameters used to calculate WACC for CPPs**

Risk-free rate (5 years)	3.95%	Debt premium (5 years)	1.85%
Risk-free rate (4 years)	3.71%	Debt premium (4 years)	1.75%
Risk-free rate (3 years)	3.42%	Debt premium (3 years)	1.65%
Equity beta	0.61	TAMRP	7.0%
Average corporate tax rate	28%	Average investor tax rate	28%
Debt issuance costs (5 years)	0.35%	Debt issuance costs (4 years)	0.44%
Debt issuance costs (3 years)	0.58%	Leverage	44%
Standard error of debt premium	0.0015	Standard error of WACC	0.011
Cost of debt (5 year)	6.15%	Cost of equity (5 years)	7.11%
Cost of debt (4 year)	5.90%	Cost of equity (4 years)	6.94%
Cost of debt (3 year)	5.65%	Cost of equity (3 years)	6.73%
Vanilla WACC (5 year, midpoint)	$6.15\% \times 0.44 + 7.11\% \times (1-0.44) = 6.69\%$		
Vanilla WACC (4 year, midpoint)	$5.90\% \times 0.44 + 6.94\% \times (1-0.44) = 6.48\%$		
Vanilla WACC (3 year, midpoint)	$5.65\% \times 0.44 + 6.73\% \times (1-0.44) = 6.26\%$		

*Risk-free rate*

15. The risk-free rate reflects the linearly-interpolated, annualised, bid yield to maturity on New Zealand government bonds with a term to maturity of five, four and three years. The estimates use data reported by Bloomberg for the month of August 2013 in respect of the April 2015, December 2017 and March 2019 maturity bonds. The April 2015, December 2017 and March 2019 bonds have simple average annualised bid yields to maturity of 3.04%, 3.82% and 4.07% respectively.
16. The daily data reported by Bloomberg is annualised (to reflect the 6 monthly payment of interest), averaged to give a monthly average, and linearly interpolated to produce the estimate of:
  - 16.1 a 3.95% interest rate on a NZ government bond with a five year term to maturity as at 1 September 2013;
  - 16.2 a 3.71% interest rate on a NZ government bond with a four year term to maturity as at 1 September 2013; and
  - 16.3 a 3.42% interest rate on a NZ government bond with a three year term to maturity as at 1 September 2013.

*Tax rates*

17. The average corporate tax rate is the corporate tax rate of 28% for all years. The average investor tax rate is the investor tax rate of 28% for all years.

*Standard error of the WACC*

18. The standard error of the WACC is determined in accordance with the formula in the EDS IM Determinations, and is shown to three decimal places only in the table above.

*Debt premium*

19. The methodology for determining the debt premium is set out in clause 5.3.25 of the EDS IM Determination.
20. Clause 5.3.25(3)(d) requires the Commission to estimate the debt premium that would reasonably be expected to apply to a vanilla NZ\$ denominated bond that:
  - 20.1 is issued by an EDB or a GPB that is neither majority owned by the Crown nor a local authority;
  - 20.2 is publicly traded;
  - 20.3 has a qualifying rating of grade BBB+; and
  - 20.4 has a remaining term to maturity of five years (or four or three years).
21. In estimating the debt premium, clause 5.3.25(4) of the EDS IM Determinations provides that the Commission will have regard to:

- 21.1 bonds issued by an EDB or a GPB (that is neither majority owned by the Crown nor a local authority) with a rating of BBB+;
  - 21.2 bonds issued by another entity (that is neither majority owned by the Crown nor a local authority) with a rating of BBB+;
  - 21.3 bonds issued by an EDB or a GPB (that is neither majority owned by the Crown nor a local authority) with a rating other than BBB+;
  - 21.4 bonds issued by another entity (that is neither majority owned by the Crown nor a local authority) with a rating other than BBB+; and
  - 21.5 bonds issued by government-owned entities.
22. Clause 5.3.25(5)(a) provides that progressively lesser regard will ordinarily be given to the debt premium estimates in the order that the bonds are identified in clauses 5.3.25(4)(a) to (e).
  23. The tables below show the debt premium determined by the Commission as at 1 September 2013. These tables include a summary of information on the investment grade rated bonds the Commission considered in determining the debt premium.
  24. A spreadsheet showing the calculations for the debt premium (and the risk-free rate) is published on our website.<sup>5</sup>

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<sup>5</sup> See [www.comcom.govt.nz/cost-of-capital](http://www.comcom.govt.nz/cost-of-capital)

**Table 3: Five-year debt premium on an EDB/GPB-issued bond rated BBB+<sup>6</sup>**

Determined debt premium on an EDB/GPB-issued bond rated BBB+ with a remaining term of 5 years as at 1 September 2013						
	Industry	Rating	Remaining Term to	Debt premium	Comment	
Determined Debt Premium	EDB / GPB	BBB+	5.0	1.85	Regard to results 4(b), 4(c) and 4(d) Not inconsistent with 4(e)	
Subclause	Issuer	Industry	Rating	Remaining Term to Maturity	Debt premium	Comment
4(a)	-	-	-	-	-	No data on applicable bonds
4(b)	WIAL <sup>1</sup>	Other	BBB+	6.9	2.01	A 5 year debt premium would be lower than this.
4(c)	Powerco <sup>2</sup>	EDB/GDB	BBB	5.0	2.00	BBB+ debt premium would be less than this
	Contact <sup>3</sup>	EDB/GDB	BBB	5.0	1.93	BBB+ debt premium would be less than this
4(d)	Telecom <sup>4</sup>	Other	A-	5.0	1.69	BBB+ debt premium would be higher than this
	AIAL <sup>5</sup>	Other	A-	5.0	1.45	BBB+ debt premium would be higher than this
	Telstra <sup>6</sup>	Other	A	3.9	1.55	A 5 year debt premium and BBB+ debt premium would be higher than this
	Fonterra <sup>7</sup>	Other	A+	2.6	1.18	A 5 year debt premium and BBB+ debt premium would be higher than this
4(e)	Genesis Energy <sup>8</sup>	EDB/GDB	BBB+	5.0	1.91	
	MRP <sup>9</sup>	EDB/GDB	BBB+	5.0	1.75	
	Meridian <sup>10</sup>	EDB/GDB	BBB+	3.6	1.60	
	CIAL <sup>11</sup>	Other	BBB+	6.4	1.92	
	Transpower <sup>12</sup>	Other	AA-	5.0	1.40	

Notes on bonds analysed:

- 1 WIAL 5.27% bond maturing 11/06/2020.
- 2 Powerco 6.74% bond maturing 28/09/2017; 6.31% bond maturing 20/12/2018.
- 3 Contact Energy 4.8% bond maturing 24/05/2018; 5.277% bond maturing 27/05/2020.
- 4 Telecom 7.04% bond maturing 22/03/2016; 5.25% bond maturing 25/10/2019.
- 5 AIAL 5.47% bond maturing 17/10/2017; 4.73% bond maturing 13/12/2019.
- 6 Telstra 7.515% bond maturing 11/07/2017.
- 7 Fonterra 6.83% bond maturing 4/03/2016.
- 8 Genesis Energy 7.185% bond maturing 15/09/2016; 5.205% bond maturing 1/11/2019.
- 9 MRP 7.55% bond maturing 12/10/2016; 5.029% bond maturing 6/03/2019.
- 10 Meridian 7.55% bond maturing 16/03/2017.
- 11 CIAL 5.15% bond maturing 6/12/2019.
- 12 Transpower 6.595% bond maturing 15/02/2017; 7.19% bond maturing 12/11/2019.

<sup>6</sup> The five-year debt premiums on the Powerco, Contact Energy, Telecom, Auckland International Airport Limited (AIAL), Genesis Energy, Mighty River Power (MRP) and Transpower bonds are calculated by linear interpolation with respect to maturity.



25. Consistent with clauses 5.3.25(4) and 5.3.25(5)(a) of the EDS IM Determinations, greatest regard has been given to the estimated debt premium on WIAL's June 2020 bond. This bond is issued by an entity other than an EDB/GPB, is publicly traded and has a rating of BBB+. However, the June 2020 bond has a term to maturity of 6.9 years, which is significantly more than five years specified in clause 5.3.25(3)(d).
26. As at 1 September 2013, the debt premium on the WIAL bond was estimated at 2.01%. Consistent with clause 5.3.25(5)(b), this estimated debt premium is treated as the maximum debt premium for a bond rated BBB+ with a term of five years.
27. The interpolated five year debt premium on Powerco's bonds is 2.00%. Powerco's bonds are rated BBB, implying that the five year debt premium on bonds rated BBB+ would be less than 2.00%.
28. The interpolated five year debt premium on Contact Energy's bonds is 1.93%. Contact Energy's bonds are rated BBB, implying that the five year debt premium on bonds rated BBB+ would be less than 1.93%.
29. The Commission has also had regard to the estimated debt premium on bonds from a range of other issuers including Telecom (1.69%, 5 years, rated A-), Auckland international Airport Limited (AIAL) (1.45%, 5 years, rated A-), Telstra (1.55%, 3.9 years, rated A) and Fonterra (1.18%, 2.6 years, rated A+). Consistent with clause 5.3.25(5)(a) these were given less weight as the issuers are not EDBs or GPBs, and the debt issues had different credit ratings than the BBB+ rating specified in clause 5.3.25(3)(d).
30. Consistent with clause 5.3.25(5)(a) the estimated debt premium on the Genesis Energy bonds (1.91%, 5 years, rated BBB+), the Mighty River Power (MRP) bonds (1.75%, 5 years, rated BBB+), the Meridian bond (1.60%, 3.6 years, rated BBB+), the Christchurch International Airport Limited (CIAL) bond (1.92%, 6.4 years, rated BBB+), and Transpower bonds (1.40%, 5 years, rated AA-) where given less weight as these issuers are either majority owned by the Crown or a local authority.
31. Starting with the estimated debt premium on the WIAL bond, but having regard to the debt premium on a range of other bonds, the Commission has determined the debt premium on a publicly traded, EDB/GPB-issued bond, rated BBB+ with a remaining term of five years to be 1.85% as at 1 September 2013.

**Table 4: Four-year debt premium on an EDB/GPB-issued bond rated BBB+<sup>7</sup>**

Determined debt premium on an EDB/GPB-issued bond rated BBB+ with a remaining term of 4 years as at 1 September 2013						
	Industry	Rating	Remaining Term to Maturity	Debt premium	Comment	
Determined Debt Premium	EDB/GDB	BBB+	4.0	1.75	Regard to results 4(b), 4(c) and 4(d) Not inconsistent with 4(e)	
Subclause	Issuer	Industry	Rating	Remaining Term to Maturity	Debt premium	Comment
4(a)	-	-	-	-	-	No data on applicable bonds
4(b)	WIAL <sup>1</sup>	Other	BBB+	6.9	2.01	A 4 year debt premium would be lower than this
4(c)	Powerco <sup>2</sup>	EDB/GDB	BBB	4.0	1.84	BBB+ debt premium would be less than this
	Contact <sup>3</sup>	EDB/GDB	BBB	4.0	1.86	BBB+ debt premium would be less than this
4(d)	Telecom <sup>4</sup>	Other	A-	4.0	1.57	BBB+ debt premium would be higher than this
	AIAL <sup>5</sup>	Other	A-	4.0	1.38	BBB+ debt premium would be higher than this
	Telstra <sup>6</sup>	Other	A	3.9	1.55	4 year debt premium and BBB+ debt premium would be higher than this
	Fonterra <sup>7</sup>	Other	A+	2.6	1.18	4 year debt premium and BBB+ debt premium would be higher than this
4(e)	Genesis Energy <sup>8</sup>	EDB/GDB	BBB+	4.0	1.75	
	MRP <sup>9</sup>	EDB/GDB	BBB+	4.0	1.66	
	Meridian <sup>10</sup>	EDB/GDB	BBB+	3.6	1.60	
	CIAL <sup>11</sup>	Other	BBB+	6.4	1.92	
	Transpower <sup>12</sup>	Other	AA-	4.0	1.31	

Notes on bonds analysed:

- 1 WIAL 5.27% bond maturing 11/06/2020
- 2 Powerco 6.53% bond maturing 29/06/2015; 6.74% bond maturing 28/09/2017.
- 3 Contact Energy 7.855% bond maturing 13/04/2017; 4.8% bond maturing 24/05/2018.
- 4 Telecom 7.04% bond maturing 22/03/2016; 5.25% bond maturing 25/10/2019.
- 5 AIAL 8.00% bond maturing 15/11/2016; 5.47% bond maturing 17/10/2017.
- 6 Telstra 7.515% bond maturing 11/07/2017.
- 7 Fonterra 6.83% bond maturing 4/03/2016.
- 8 Genesis Energy 7.185% bond maturing 15/09/2016; 5.205% bond maturing 1/11/2019.
- 9 MRP 7.55% bond maturing 12/10/2016; 5.029% bond maturing 6/03/2019.
- 10 Meridian 7.55% bond maturing 16/03/2017.
- 11 CIAL 5.15% bond maturing 6/12/2019.
- 12 Transpower 6.595% bond maturing 15/02/2017; 7.19% bond maturing 12/11/2019.

<sup>7</sup> The four-year debt premiums on the Powerco, Contact Energy, Telecom, AIAL, Genesis Energy, MRP and Transpower bonds are calculated by linear interpolation with respect to maturity.

32. Consistent with clauses 5.3.25(4) and 5.3.25(5)(a) of the EDS IM Determinations, greatest regard has been given to the estimated debt premium on WIAL's June 2020 bond. This bond is issued by an entity other than an EDB/GPB, is publicly traded and has a rating of BBB+. However, the June 2020 bond has a term to maturity of 6.9 years, which is significantly more than four years specified in clause 5.3.25(3)(d).
33. As at 1 September 2013, the debt premium on the WIAL bond was estimated at 2.01%. Consistent with clause 5.3.25(5)(b), this estimated debt premium is treated as the maximum debt premium for a bond rated BBB+ with a term of four years.
34. The interpolated four year debt premium on Powerco's bonds is 1.84%. Powerco's bonds are rated BBB, implying that the four year debt premium on bonds rated BBB+ would be less than 1.84%.
35. The interpolated four year debt premium on Contact Energy's bonds is 1.86%. Contact Energy's bonds are rated BBB, implying that the five year debt premium on bonds rated BBB+ would be less than 1.86%.
36. The Commission has also had regard to the estimated debt premium on bonds from a range of other issuers including Telecom (1.57%, 4 years, rated A-), AIAL (1.38%, 4 years, rated A-), Telstra (1.55%, 3.9 years, rated A), and Fonterra (1.18%, 2.6 years, rated A+). Consistent with clause (5)(a) these were given less weight as the issuers are not EDBs or GPBs, and the debt issues had different credit ratings than the BBB+ rating specified in clause (3)(d).
37. Consistent with clause 5.3.25(5)(a) the estimated debt premium on the Genesis Energy bonds (1.75%, 4 years, rated BBB+), the MRP bonds (1.665, 4 years, rated BBB+), the Meridian bond (1.60%, 3.6 years, BBB+), the CIAL bond (1.92%, 6.4 years, rated BBB+), and Transpower bonds (1.31%, 4 years, rated AA-) where given less weight as these issuers are either majority owned by the Crown or a local authority.
38. Starting with the estimated debt premium on the WIAL bond, but having regard to the debt premium on a range of other bonds, the Commission has determined the debt premium on a publicly traded, EDB/GPB-issued bond, rated BBB+ with a remaining term of four years to be 1.75% as at 1 September 2013.

**Table 5: Three-year debt premium on an EDB/GPB-issued bond rated BBB+<sup>8</sup>**

Determined debt premium on an EDB/GPB-issued bond rated BBB+ with a remaining term of 3 years as at 1 September 2013						
	Industry	Rating	Remaining Term to	Debt premium	Comment	
Determined Debt Premium	EDB/GDB	BBB+	3.0	1.65	Regard to results 4(b), 4(c) and 4(d) Not inconsistent with 4(e)	
Subclause	Issuer	Industry	Rating	Remaining Term to Maturity	Debt premium	Comment
4(a)	-	-	-	-	-	No data on applicable bonds
4(b)	WIAL <sup>1</sup>	Other	BBB+	6.9	2.01	A 3 year debt premium would be lower than this
4(c)	Powerco <sup>2</sup>	EDB/GDB	BBB	3.0	1.68	BBB+ debt premium would be lower than this
	Contact <sup>3</sup>	EDB/GDB	BBB	3.7	1.84	BBB+ debt premium would be lower than this
4(d)	Telecom <sup>4</sup>	Other	A-	3.0	1.46	BBB+ debt premium would be higher than this
	AIAL <sup>5</sup>	Other	A-	3.0	1.33	BBB+ debt premium would be higher than this
	Telstra <sup>6</sup>	Other	A	3.9	1.55	3 year debt premium would be lower than this. BBB+ debt premium would be higher than this
	Fonterra <sup>7</sup>	Other	A+	2.6	1.18	3 year debt premium and BBB+ debt premium would be higher than this
4(e)	Genesis Energy <sup>8</sup>	EDB/GDB	BBB+	3.0	1.57	
	MRP <sup>9</sup>	EDB/GDB	BBB+	3.2	1.58	
	Meridian <sup>10</sup>	EDB/GDB	BBB+	3.6	1.60	
	CIAL <sup>11</sup>	Other	BBB+	6.4	1.92	
	Transpower <sup>12</sup>	Other	AA-	3.5	1.27	

Notes on bonds analysed:

- 1 WIAL 5.27% bond maturing 11/06/2020
- 2 Powerco 6.53% bond maturing 29/06/2015; 6.74% bond maturing 28/09/2017
- 3 Contact Energy 7.855% bond maturing 13/04/2017
- 4 Telecom 7.04% bond maturing 22/03/2016; 5.25% bond maturing 25/10/2019.
- 5 AIAL 7.25% bond maturing 07/11/2015; 8% bond maturing 10/08/2016.
- 6 Telstra 7.515% bond maturing 11/07/2017.
- 7 Fonterra 6.83% bond maturing 4/03/2016.
- 8 Genesis Energy bond 7.185% maturing 15/09/2016; 5.205% bond maturing 1/11/2019.
- 9 MRP 7.55% bond maturing 12/10/2016.
- 10 Meridian 7.55% bond maturing 16/03/2017.
- 11 CIAL 5.15% bond maturing 6/12/2019.
- 12 Transpower bond 6.595% maturing 15/02/2017.

<sup>8</sup> The three-year debt premiums on the Powerco, Telecom, AIAL, and Genesis Energy bonds are calculated by linear interpolation with respect to maturity.

39. Consistent with clauses 5.3.25(4) and 5.3.25(5)(a) of the EDS IM Determinations, greatest regard has been given to the estimated debt premium on WIAL's June 2020 bond. This bond is issued by an entity other than an EDB/GPB, is publicly traded and has a rating of BBB+. However, the June 2020 bond has a term to maturity of 6.9 years, which is significantly more than three years specified in clause 5.3.25(3)(d).
40. As at 1 September 2013, the debt premium on the WIAL bond was estimated at 2.01%. Consistent with clause 5.3.25(5)(b), this estimated debt premium is treated as the maximum debt premium for a bond rated BBB+ with a term of three years.
41. The interpolated three year debt premium on Powerco's bonds is 1.68%. Powerco's bonds are rated BBB, implying that the three year debt premium on bonds rated BBB+ would be less than 1.68%.
42. The interpolated four year debt premium on Contact Energy's bonds is 1.84%. Contact Energy's bonds are rated BBB, implying that the three year debt premium on bonds rated BBB+ would be less than 1.84%.
43. The Commission has also had regard to the estimated debt premium on bonds from a range of other issuers including Telecom (1.46%, 3 years, rated A-), AIAL (1.33%, 3 years, rated A-), Telstra (1.55%, 3.9 years, rated A), and Fonterra (1.18%, 2.6 years, rated A+). Consistent with clause (5)(a) these were given less weight as the issuers are not EDBs or GPBs, and the debt issues had different credit ratings than the BBB+ rating specified in clause (3)(d).
44. Consistent with clause 5.3.25(5)(a) the estimated debt premium on the Genesis Energy bonds (1.57%, 3 years, rated BBB+), the MRP bonds (1.58%, 3.2 years, rated BBB+), the Meridian bond (1.60%, 3.6 years, rated BBB+), the CIAL bond (1.92%, 6.4 years, rated BBB+), and Transpower bonds (1.27%, 3.5 years, rated AA-) were given less weight as these issuers are either majority owned by the Crown or a local authority.
45. Starting with the estimated debt premium on the WIAL bond, but having regard to the debt premium on a range of other bonds, the Commission has determined the debt premium on a publicly traded, EDB/GPB-issued bond, rated BBB+ with a remaining term of three years to be 1.65% as at 1 September 2013.