PG&E Corporation

Quantifying San Bruno; major risk priced in. Maintain Buy

San Bruno big overhang; will stay that way for awhile

San Bruno remains a major concern for PCG and the CPUC. Post our meetings with the CPUC and PCG management last week, we believe San Bruno and its ramifications will likely get worse before it gets better. We have done some scenario analysis and believe most of the San Bruno risk is priced in. We have adjusted our estimates down to reflect a reasonable downside scenario (additional \$500M of non-recoverable costs). On our revised estimates PCG still trades at an 8% discount to peers. Maintain our Buy rating but lower PO to \$48.

Lowering estimates on estimated San Bruno impact

We our adjusting our 2011-2014 PCG estimates to \$3.65/\$3.80/\$3.79/\$3.88 from \$3.65/\$3.89/\$3.95/\$4.05. We assume an additional \$500M of non-recoverable costs associated with San Bruno (SB) on top of our previous estimate of \$300M of direct costs (combination of direct costs and penalties) and fund the additional \$500M entirely with equity. In addition, we lower the equity ratio in 2013 to 48% (in-line with EIX) from 52%. We issue \$1.2B of debt and repurchase \$1.2B of stock to lower the equity ratio. We believe our SB estimate is reasonable.

Fundamental utility story intact

Though the CPUC has been under strain as a result of San Bruno, the commissioners said they would treat PCG fairly in other matters including the upcoming GRC approval. In addition, we still see LT earnings growth from renewables investments to meet the state's RPS. Eventually, PCG will see rate base growth to enhance its gas system, but the transition from shareholderfunded spend to fix San Bruno to ratepayer-funded spend to achieve best-in-class safety is still uncertain.

Maintain Buy: Lowering PO to \$48

Our PO is based on an industry average of 12.5x 2013E earnings. Risks are liability related to the explosion, approval of the settlement, regulatory changes.

Estimates (Dec) (US\$) 2009A 2010A 2011E 2012E 2013E 3.43 3.65 3.80 3.79 FPS 3 20 3.79 GAAP EPS 3 20 284 2.12 3.80 EPS Change (YoY) 60% 7.2% 64% 4.1% -0.3% Consensus EPS (Bloomberg) 3 70 3.91 3 98 DPS 1.68 1.82 1.89 1.97 2.05 Valuation (Dec) 2009A 2010A 2011E 2012E 2013E P/E 13.8x 12.8x 12.1x 11.6x 11.6x GAAP P/E 13.8x 15.5x 20.8x 11.6x 11.6x **Dividend Yield** 3.8% 4.1% 4.3% 4.5% 4.6% EV / EBITDA* 11.4x 11.1x12.2x9.1x 8.9x Free Cash Flow Yield* -5.3% -3.4% 2.0% 1.5% -2.7%

* For full definitions of *iQmethod*SM measures, see page 9.

BofA Merrill Lynch does and seeks to do business with companies covered in its research reports. As a result, investors should be aware that the firm may have a conflict of interest that could affect the objectivity of this report. Investors should consider this report as only a single factor in making their investment decision.

Refer to important disclosures on page 10 to 12. Analyst Certification on Page 8. Price Objective Basis/Risk on page 8. Link to Definitions on page 8.11038356

Price Objective Change

Equity | United States | Electric Utilities 12 April 2011

Bank of America **Merrill Lynch**

Steve Fleishman	+1 646 855 2906
Research Analyst	
MLPF&S	
steven.fleishman@baml.com	
Naaz Khumawala	+1 713 247 7313
Research Analyst	
MLPF&S	
naaz.khumawala@baml.com	

Stock Data

Price	US\$44.06
Price Objective	US\$48.00
Date Established	12-Apr-2011
Investment Opinion	A-1-7
Volatility Risk	LOW
52-Week Range	US\$34.95-48.63
Mrkt Val / Shares Out (mn)	US\$17,496 / 397.1
BofAML Ticker / Exchange	PCG/NYS
Bloomberg / Reuters	PCG US / PCG.N
ROE (2011E)	12.4%
Total Dbt to Cap (Dec-2009A)	49.5%
Est. 5-Yr EPS / DPS Growth	3.0% / 4.0%

Key Changes

(US\$)	Previous	Current
Price Obj.	50.00	48.00
2011E Rev (m)	14,810.0	15,088.4
2012E Rev (m)	15,337.1	15,589.6
2013E Rev (m)	15,380.6	15,480.6
2012E EPS	3.89	3.80
2013E EPS	3.95	3.79
2011E DPS	1.97	1.89



12 April 2011

iQprofile^{^M} PG&E Corporation

<i>iQmethod</i> ^{5M} – Bus Performance*					
(US\$ Millions)	2009A	2010A	2011E	2012E	2013E
Return on Capital Employed	4.8%	4.0%	3.1%	4.8%	4.5%
Return on Equity	12.5%	12.4%	12.4%	12.1%	10.9%
Operating Margin	17.7%	16.9%	20.7%	21.6%	21.8%
Free Cash Flow	(919)	(596)	344	261	(480)
<i>iQmethod</i> [™] – Quality of Earnings*					
		00404	20445	00400	20425
(US\$ Millions) Cash Realization Ratio	2009A 2.5x	2010A 2.4x	2011E 3.0x	2012E 2.6x	2013E 2.2x
Asset Replacement Ratio	2.3x 2.3x	2.4x 2.0x	2.3x	2.0x 2.1x	2.2x 2.0x
Tax Rate	27.2%	33.0%	39.0%	39.0%	39.0%
Net Debt-to-Equity Ratio	109.7%	108.7%	107.9%	97.0%	112.8%
Interest Cover	3.4x	3.4x	2.8x	4.2x	3.7x
Income Statement Data (Dec)					
(US\$ Millions)	2009A	2010A	2011E	2012E	2013E
Sales	13,399	13,841	15,088	15,590	15,481
% Change Gross Profit	-8.4% 8,397	3.3% 8,652	9.0% 9.829	3.3% 10,308	-0.7% 10,176
% Change	3.5%	3.0%	9,829 13.6%	4.9%	-1.3%
EBITDA	4,118	4,240	3,858	5,171	5,275
% Change	8.6%	3.0%	-9.0%	34.0%	2.0%
Net Interest & Other Income	(672)	(675)	(771)	(798)	(910)
Net Income (Adjusted)	1,234	1,345	1,449	1,567	1,503
% Change	14.2%	9.0%	7.8%	8.1%	-4.1%
Free Cash Flow Data (Dec) (US\$ Millions) Net Income from Cont Operations (GAAP) Depreciation & Amortization Change in Working Capital Deferred Taxation Charge Other Adjustments, Net Capital Expenditure	2009A 1,234 1,752 (814) 809 58 (3,958)	2010A 1,113 1,905 (861) 756 293 (3,802)	2011E 841 1,709 0 (100) 1,893 (3,999)	2012E 1,567 1,805 0 (50) 773 (3,834)	2013E 1,503 1,901 0 (50) 0 (3,834)
Free Cash Flow % Change	-919 -4.6%	-596 35.1%	344 NM	261 -24.1%	-480 NM
Balance Sheet Data (Dec)					
(US\$ Millions)	2009A	2010A	2011E	2012E	2013E
Cash & Equivalents	1,160	854	429	955	963
Trade Receivables	2,280	2,387	2,387	2,387	2,387
Other Current Assets	2,217	2,301	1,421	1,071	1,071
Property, Plant & Equipment	28,892	31,449	33,335	34,941	36,874
Other Non-Current Assets	8,396	9,034	9,034	9,634	9,634
Total Assets	42,945	46,025	46,606	48,988	50,929
Short-Term Debt	1,175	1,662	1,662	1,662	1,662
Other Current Liabilities	5,252	5,119	4,556	4,556	4,556
Long-Term Debt	11,594	11,733	12,129	12,906	15,006
Other Non-Current Liabilities	14,339	15,977	15,877	15,827	15,777
Total Liabilities	32,360	34,491	34,224	34,951	37,001
Total Equity Total Equity & Liabilities	10,585 42,945	11,534 46,025	12,382 46,606	14,037 48,988	13,928 50,929
* For full definitions of imathods measures see page 9					

* For full definitions of *iQmethod*SM measures, see page 9.

Company Description

PG&E Corp is one of the largest combination natural gas and electric utilities in the United States and the third largest regulated utility in our coverage universe. Based in San Francisco, California, the company primary business is the transmission and delivery of energy. The company provides natural gas and electric service to approximately 15 million people throughout a 70,000-square-mile service area to most of the northern two-thirds of California.

Investment Thesis

PCG offers a compelling regulated growth story with well below average risk. PCG benefits from very supportive state regulation in CA. Key positive CA regulatory mechanisms include revenue decoupling, cost of capital adjustment mechanism, and a pension balancing account. We project earnings growth of 6-7% over the next 5 years driven by a 10% growth in ratebase, through investments in transmission and distribution and generation. We expect PCG to increase the dividend as earnings grow.

Stock Data

me	2,939,970
igs Estimates	
2010	2011
0.79A	NA
0.91A	NA
1.02A	NA
0.72A	NA
	Igs Estimates 2010 0.79A 0.91A 1.02A

San Bruno remains a major concern for PCG and the CPUC. Post our meetings with the CPUC and PCG management last week, we believe San Bruno and its ramifications will likely get worse before it gets better.

We have done some scenario analysis and believe most of the San Bruno risk is priced in. We have adjusted our estimates down to reflect a reasonable downside scenario. On our revised estimates PCG still trades at an 8% discount to peers.

Maintain our Buy rating but lower price objective to \$48

Quantifying San Bruno risk

Last week, we met with four of the five CPUC commissioners as well as several other PUC members. Significant public pressure in the wake of the San Bruno explosion is clearly weighing on the agency. Please see our note on our California meetings <u>"CA PUC meetings reasonable"</u>.

The following are major highlights in our approach to analyzing San Bruno and its impact on PCG.

- San Bruno explosion is major overhang on PCG and has pressured the CPUC considerably. San Bruno was a horrific event that turned a negative spotlight on PCG and the CPUC. It will take some time for both of them to regain credibility with the public. In the meantime, we expect considerable focus and political pressure on PCG, and tough treatment from regulators on recordkeeping and safety.
- San Bruno newsflow will likely get worse before it gets better and clarity is awhile away. Next steps include a hearing that was held on April 11, 2011 on the proposed stipulation; it is unclear to us whether this passes. A CPUC independent investigation is due in May that will likely have tough recommendations. The NTSB will issue its report in August/September along with the Order on Rulemaking which will likely recommend stricter standards for pipeline inspections and safety. The Order Instituting an Investigation will likely result in fines by year end.
- We assume a reasonable downside scenario for San Bruno impacts and find that PCG still trades at a material discount. We have updated our estimates and price target to reflect higher San Bruno costs and a worse cost of capital decision. We now assume an additional \$500M of direct costs (combination of un-recoverable costs and penalties) on top of PCG's current \$200-\$300M estimate. To be conservative we fund the entire additional \$500M of costs by issuing equity, diluting earnings by about \$0.10 annualized. Even so, on our new estimates the stock trades at an 8% discount to its peers (see Table 1 below).

We believe PCG would have to realize an additional \$1.5B of direct costs (instead of the \$500M we assume) before the stock traded at an average to the group. We believe non-recoverable direct costs that high are very unlikely as eventually safety improvements on pipelines will be funded by ratepayers.

Fundamental utility story is intact. Several commissioners mentioned that PCG will not be treated harsher than the other utilities due to San Bruno and our sense was that the GRC would likely be adopted. Longer-term we still believe CA is a constructive regulatory environment. We see LT earnings growth from renewables investments to meet the state's RPS of 33% by 2020.



Table 1: Regulated Utilities Comparables

Company		Current	Mkt Cap		P/E	-		Div	Div	Payout	Price/	Equity
Name	Ticker	Price	(\$M)	2010A	2011E	2012E	2013E	Yield	Growth (E)	Ratio	Book	Ratio
Alliant Energy	LNT	\$38.79	\$4,301	14.3x	13.9x	13.1x	12.6x	4.4%	3.8%	63%	1.5x	53%
American Electric	AEP	34.78	16,733	11.5x	11.2x	11.0x	10.8x	5.3%	3.0%	61%	1.2x	43%
CMS Energy	CMS	18.90	4,765	13.9x	13.1x	12.4x	11.7x	4.4%	4.0%	62%	1.7x	29%
CenterPoint Energy	CNP	17.32	7,358	16.2x	15.8x	14.8x	14.0x	4.6%	1.3%	74%	2.3x	25%
Consolidated Edison	ED	50.22	14,676	14.6x	14.1x	13.6x	13.4x	4.8%	0.8%	70%	1.3x	51%
DPL Inc.	DPL	27.42	3,206	11.0x	11.5x	11.4x	14.7x	4.9%	4.5%	53%	2.6x	48%
DTE Energy	DTE	48.73	8,257	13.5x	13.5x	12.9x	12.2x	4.6%	5.0%	62%	1.2x	45%
Duke Energy	DUK	18.16	24,137	12.7x	13.5x	12.9x	12.5x	5.4%	2.0%	69%	1.1x	55%
Hawaiian Electric	HE	24.66	2,339	20.4x	16.4x	14.1x	12.9x	5.0%	0.0%	102%	1.6x	48%
Northeast Utilities	NU	34.19	6,035	15.8x	14.7x	14.0x	12.9x	3.2%	6.8%	51%	1.6x	43%
NSTAR	NST	45.02	4,663	17.6x	16.7x	16.1x	15.5x	3.8%	5.9%	66%	2.4x	42%
NV Energy	NVE	14.74	3,473	15.2x	15.0x	11.7x	11.6x	3.3%	8.4%	49%	1.0x	39%
PG&E	PCG	44.06	17,459	12.8x	12.1x	11.6x	11.6x	4.1%	4.0%	53%	1.5x	46%
Pinnacle West	PNW	42.45	4,618	13.8x	13.9x	12.3x	11.9x	4.9%	3.3%	68%	1.3x	51%
Portland General	POR	23.79	1,792	14.3x	12.6x	12.7x	11.8x	4.4%	1.9%	63%	1.1x	47%
Progress Energy	PGN	45.54	13,379	15.0x	14.5x	14.0x	13.4x	5.4%	0.5%	82%	1.3x	44%
SCANA	SCG	38.94	4,979	13.1x	12.5x	12.2x	11.4x	5.0%	2.1%	65%	1.3x	43%
Southern Company	SO	37.78	31,947	15.9x	14.9x	14.0x	13.2x	4.8%	4.0%	77%	1.9x	45%
TECO Energy	TE	18.69	4,016	14.5x	13.9x	13.2x	13.4x	4.4%	2.4%	64%	1.9x	40%
UIL Holdings	UIL	30.12	1,521	15.3x	15.9x	14.7x	14.3x	5.7%	0.0%	88%	1.4x	57%
Westar Energy	WR	25.90	2,941	14.2x	14.9x	12.8x	12.5x	4.9%	3.1%	70%	1.2x	44%
Wisconsin Energy	WEC	29.73	6,949	15.5x	14.4x	13.2x	12.8x	3.5%	10.9%	54%	1.8x	43%
Xcel Energy	XEL	23.51	11,795	14.3x	13.5x	12.9x	11.9x	4.3%	3.0%	62%	1.4x	46%
Average				14.6x	14.0x	13.1x	12.7x	4.6%	3.4%	66%	1.6x	45%
Owner Deft Marill Longh Ob	h -1 (D											

Source: BofA Merrill Lynch Global Research

Significant public pressure in the wake of the San Bruno explosion is clearly weighing on the CPUC. For PCG, San Bruno is a huge overhang with several proceedings pending that could result in penalties and higher direct spending.

San Bruno impacts...

The San Bruno accident has turned the spotlight on the PUC, and it may take awhile for the PUC and PG&E to regain its credibility. One of the commissioners commented on the negative publicity the CPUC has gotten as a result of San Bruno, and feels that the CPUC has its back against the wall. Moreover, many commissioners emphasized the need for utilities to honor the public contract, that is to provide safe and reliable service, not just focus on compliance.

Next steps in San Bruno include a hearing on the show cause order and stipulation that was held on April 11, 2011. It is unclear whether the stipulation in the current form will be passed, as some commissioners believe the \$3M fine (\$6M all-in) could be too low. The CPUC independent investigation is due in May and will likely include tough recommendations for all California utilities on safety. A final NTSB report is expected in August or September 2011, which will also give recommendations.

Sempra (SRE) is expected to file its gas records on April 15, 2011. From current indications it appears that SRE will compare favorably to PCG, further increasing the pressure on PCG to improve its operations.

The current Order Instituting Investigation (OII) is expected to be done this year and will likely result in fines for PCG. We note that previous fines from the CPUC have been in the \$20-\$30M range, however it is unclear how large the PCG fine will be. Some have compared this to EIX's penalty on its performance based rates issue which was about \$180M. However, we note the actual fine for violating the Public Utilities Code was \$30M, with the remainder being customer givebacks. One commissioner commented that he/she would need to see a substantial penalty to clear the air and move on to a discussion of safety. At some point, PCG will see rate base growth to enhance its gas system, but the transition from shareholder-funded spend to fix San Bruno to ratepayer-funded spend to achieve best-in-class safety is still uncertain.

Pipeline inspection costs

PCG has committed to 152 miles of hydrotesting or replacement by late this year. It may be difficult to get this done in time as gas supply issues arise. According to a commission staffer, hydrotesting costs \$600,000/mile and replacement costs \$3M per mile. Eventually PCG will need to address all 455 miles of its system.

PCG management thoughts

We met with PCG management last week to discuss San Bruno. Management characterized the event as horrific and emphasized its desire to learn from the event and establish an extremely safe utility operation (both gas and electric) going forward. To this end, the PCG Board has commissioned an independent study to evaluate how to create a world class gas business. Findings from this are expected to come out in 3Q 2011.

PCG management points out that it complied with the regulations set forth at the time of the pipe installations back in 1956. Recordkeeping was not required until post 1970 on pipes, and many of the older pipes were grandfathered in. As the standards on pipeline integrity and safety may chance, management believes that ratepayers may have to invest in this to allow PCG to meet new standards.

Adjusting estimates for San Bruno, cost of capital

We our adjusting our 2011-2014 PCG estimates to \$3.65/\$3.80/\$3.79/\$3.88 from \$3.65/\$3.89/\$3.95/\$4.05. We have made the following adjustments to our model.

- Assume an additional \$500M of non-recoverable costs associated with San Bruno. PCG currently assumes \$200-\$300M of direct costs associated with San Bruno. We assume the high end of \$300M and an incremental \$500M of costs. We fund the incremental \$500M of costs with equity issued in 1Q 2012.
- We lower the equity ratio in 2013 to 48% (in-line with EIX) from 52%. We issue \$1.2B of debt and repurchase \$1.2B of stock to lower the equity ratio appropriately.
- We had previously already reduced our 2013 and forward CPUC jurisdictional ROE by 50bps to 10.85% from 11.35%. We did not reduce the FERC ROE, and maintain it at 12%. This gives a weighted average allowed ROE of ~11% down from PCG's current weighted average allowed ROE of 11.45%.

What level of San Bruno expense is in the stock? We believe the current PCG stock price reflects about \$1.5B of incremental costs funded through equity. We believe this downside case is unlikely given the moderate penalties imposed by the CPUC in the past, and the eventuality that some of the ongoing costs could be borne by ratepayers.

That said, we do not see our current SB cost assumptions as the worst case scenario for the stock. Depending on the outcome of the OII, one possibility is that the eventual gas spend could earn a lower ROE than the PCG CPUC jurisdictional ROE.

We our adjusting our 2011-2014 PCG estimates to \$3.65/\$3.80/\$3.79/\$3.88

We believe the current PCG stock price reflects about \$1.5B of incremental costs funded through equity. We believe this downside case is unlikely given the moderate penalties imposed by the CPUC in the past Given the increased scrutiny on political pressure on PCG, we believe dividend growth may slow or take a pause for a year.

An ambitious renewables standard and increased focus on safety will drive rate base growth for all the California utilities.

We expect renewables to be a key driver of the 10%+ rate base growth for PCG and EIX

Lowering PO to \$48

Our PO is based on an industry average of 12.5x 2013E earnings. We believe an industry average is justified given that we are already cutting PCG estimates for the SB impact and potential ROE and equity layer reductions.

Financial update and dividend growth

PCG had committed to giving 2012 guidance post its GRC, which we assume will get adopted relatively soon. The company plans to host an analyst day to update investors on San Bruno costs, long-term growth, capex and dividend policy. Given the increased scrutiny on political pressure on PCG, we believe dividend growth may slow or take a pause for a year. Historically PCG has grown its dividend by about 8% per year, however we have trimmed that to 4% in our estimates. We could also see PCG not growing the dividend this year, but resuming it in 2012. Even on our new, lower estimates PCG's payout ratio of 53% remains below the industry average (see Table 1).

GRC settlement still outstanding

We are still waiting for a final decision on PCG's Gas Storage & Transmission GRC and Electric & Gas GRC. Several commissioners mentioned that PCG will not be treated harsher than the other utilities due to San Bruno and our sense was that the GRC would likely be adopted especially given the largely unanimous support of the settlement by major parties.

Bonus D&A case seems to be moving in right direction

There is currently an open proceeding to address how the bonus D&A tax benefits will be utilized by the California utilities. We believe this case is moving in the right direction, with most commissioners supportive of the status quo. Currently utilities spend the bonus D&A on additional investments that offsets the hit to rate base in latter years from increased deferred taxes.

CA regulatory still long-term attractive

Our visit with the CPUC reaffirmed our belief that the CA regulatory environment is still attractive LT. An ambitious renewables standard and increased focus on safety will drive rate base growth for all the California utilities. All of the commissioners acknowledged that CA will need healthy utilities, we have previously adjusted our estimates for a 50bps ROE cut in 2013.

Renewables remains key focus

The California State Assembly recently passed the bill (SB 2X1) that would require California utilities to get 33% of its power from renewable sources by 2020. Previously this bill was an executive order, and we expect Governor Brown to sign it into law. This is the most aggressive renewable standard in the country.

Moreover, Governor Brown conveyed his goals of making 33% a floor not a ceiling to his three recent appointments to the CPUC (Florio, Sandoval, Ferron).

We expect the increased renewables standard to drive rate base investment in both renewable generation and transmission build. All the commissioners seem supportive of a combination of utility owned generation and purchased power contracts, particularly given the difficulty in transmission siting. We expect renewables to be a key driver of the 10%+ rate base growth for PCG and EIX.

Financial Summary

Our new 2011-2014 PCG estimates are \$3.65/\$3.80/\$3.79/\$3.88 from \$3.65/\$3.89/\$3.95/\$4.05. Tables 2 and 3 highlight our financial summary and modeling assumptions for PCG.

Financial Summary	2011E	2012E	2013E	2014E
EPS	\$3.65	\$3.80	\$3.79	\$3.88
Diluted Shares Outstanding	397	412	396	406
Dividends Per Share	\$1.89	\$1.97	\$2.05	\$2.13
DividendYield	4.2%	4.4%	4.6%	4.8%
Dividend Payout Ratio	52%	52%	54%	55%
Equity Ratio	49%	51%	47%	48%
FFO/Net Debt	33%	30%	21%	21%
Valuation Metrics				
P/E	12.3x	11.8x	11.8x	11.5x
Price/Book	1.4x	1.3x	1.3x	1.2x
Segment EPS				
Utility	\$3.67	\$3.80	\$3.79	\$3.88
Parent	(0.02)	(0.00)	0.00	0.01
Total EPS	\$3.65	\$3.80	\$3.79	\$3.88
Utility				
Realized ROE	11.9%	11.8%	11.3%	11.3%
Average Rate Base	\$23,657	\$25,591	\$27.622	\$28,974

Assumptions	2011E	2012E	2013E	2014E
Total Capital Spending by Segme	ent (\$M)			
Electric Distribution	\$1,550	\$1,550	\$1,550	\$1,550
Generation	375	375	375	375
Common Plant	350	350	350	350
Electric Transmission	950	950	950	950
Gas Transmission	200	200	200	200
AMI & Other	165	0	0	0
Total Capex	\$3,590	\$3,425	\$3,425	\$3,425
Financings (\$M)				
Total Equity Issued/(Repurchase)d	\$150	\$900	(\$800)	\$400
Total Debt Issued/(Repurchased)	800	1,200	2,100	900
Sales Forecast				
Electric Customer Growth	0.0%	0.0%	0.0%	0.0%
Gas Customer Growth	1.8%	1.8%	1.8%	1.8%

Source: BofA Merrill Lynch Global Research

Source: BofA Merrill Lynch Global Research

7



Price objective basis & risk PG&E Corporation (PCG)

Our \$48 price objective assumes an average P/E of 12.5x 2013E earnings, in line with the regulated utility average. Risks to our outlook are: 1) liability related to the San Bruno explosion, 2) approval of the settlement in the 2011 general rate case and 3) Any unforeseen changes to California regulation.

Link to Definitions

Energy

Click here for definitions of commonly used terms.

Analyst Certification

I, Steve Fleishman, hereby certify that the views expressed in this research report accurately reflect my personal views about the subject securities and issuers. I also certify that no part of my compensation was, is, or will be, directly or indirectly, related to the specific recommendations or view expressed in this research report.

US - Electric Utilities/Competitive Power Coverage Cluster

nvestment rating	Company	BofA Merrill Lynch ticker	Bloomberg symbol	Analyst
3UY -				
	American Water Works	AWK	AWKUS	Steve Fleishman
	CenterPoint Energy, Inc.	CNP	CNP US	Steve Fleishman
	Edison International	EIX	EIX US	Steve Fleishman
	GenOn Energy, Inc.	GEN	GEN US	Ameet I. Thakkar
	NextEra Energy	NEE	NEE US	Steve Fleishman
	NV Energy	NVE	NVE US	Steve Fleishman
	PG&E Corporation	PCG	PCG US	Steve Fleishman
	Public Service Enterprise Group Inc.	PEG	PEG US	Steve Fleishman
	Southern Company	SO	SOUS	Steve Fleishman
	Westar Energy	WR	WRUS	Steve Fleishman
	Wisconsin Energy	WEC	WEC US	Alex Kania
	Xcel Energy	XEL	XEL US	Steve Fleishman
IEUTRAL				
	Alliant Energy	LNT	LNT US	Steve Fleishman
	American Electric Power	AEP	AEP US	Steve Fleishman
	Calpine	CPN	CPN US	Ameet I. Thakkar
	CMS Energy	CMS	CMS US	Steve Fleishman
	Consolidated Edison	ED	ED US	Steve Fleishman
	Constellation Energy Group	CEG	CEG US	Ameet I. Thakkar
	Dominion Resources	D	D US	Steve Fleishman
	Duke Energy	DUK	DUK US	Steve Fleishman
	Northeast Utilities	NU	NU US	Steve Fleishman
	NRG Energy	NRG	NRG US	Ameet I. Thakkar
	NSTAR	NST	NST US	Steve Fleishman
	Pinnacle West	PNW	PNW US	Steve Fleishman
	Portland General Electric Company	POR	POR US	Steve Fleishman
	TECO Energy	TE	TEUS	Steve Fleishman
	UIL Holdings	UIL	UILUS	Steve Fleishman
NDERPERFORM				
	Ameren Corp	AEE	AEE US	Steve Fleishman
	DPL Inc.	DPL	DPL US	Steve Fleishman
	DTE Energy	DTE	DTE US	Steve Fleishman
	Entergy	ETR	ETRUS	Steve Fleishman
	Exelon	EXC	EXCUS	Steve Fleishman
	FirstEnergy	FE	FE US	Steve Fleishman
	Hawaiian Electric Industries	HE	HEUS	Steve Fleishman
	SCANA Corp.	SCG	SCGUS	Steve Fleishman



US - Electric Utilities/Competitive Power Coverage Cluster

Investment rating Company	BofA Merrill Lynch ticker	Bloomberg symbo	I Analyst
RSTR		Logo Contractor	
PPL Corporation	PPL	PPL US	Steve Fleishman

<i>iQ</i> method [™] Measures Defi	nitions	
Business Performance	Numerator	Denominator
Return On Capital Employed	NOPAT = (EBIT + Interest Income) * (1 - Tax Rate) + Goodwill Amortization	Total Assets – Current Liabilities + ST Debt + Accumulated Goodwill Amortization
Return On Equity	Net Income	Shareholders' Equity
Operating Margin	Operating Profit	Sales
Earnings Growth	Expected 5-Year CAGR From Latest Actual	N/A
Free Cash Flow	Cash Flow From Operations – Total Capex	N/A
Quality of Earnings		
Cash Realization Ratio	Cash Flow From Operations	Net Income
Asset Replacement Ratio	Capex	Depreciation
Tax Rate	Tax Charge	Pre-Tax Income
Net Debt-To-Equity Ratio	Net Debt = Total Debt, Less Cash & Equivalents	Total Equity
Interest Cover	EBIT	Interest Expense
Valuation Toolkit		
Price / Earnings Ratio	Current Share Price	Diluted Earnings Per Share (Basis As Specified)
Price / Book Value	Current Share Price	Shareholders' Equity / Current Basic Shares
Dividend Yield	Annualised Declared Cash Dividend	Current Share Price
Free Cash Flow Yield	Cash Flow From Operations – Total Capex	Market Cap. = Current Share Price * Current Basic Shares
Enterprise Value / Sales	EV = Current Share Price * Current Shares + Minority Equity + Net De Other LT Liabilities	bt + Sales
EV / EBITDA	Enterprise Value	Basic EBIT + Depreciation + Amortization
<i>iQmethod^{sse}is</i> the set of BofA Merrill Lync		ess Performance, Quality of Earnings, and validations. The key features of iQmethod are: A consistently

ipdatabase [®] is our real-time global research database that is sourced directly from our equity analysts' earnings models and includes forecasted as well as historical data for income statements, balance sheets, and cash flow statements for companies covered by BofA Merrill Lynch.

iQprofile SM, iQmethod SM are service marks of Merrill Lynch & Co., Inc. iQdatabase Tis a registered service mark of Merrill Lynch & Co., Inc.



Important Disclosures



Prior to May 31, 2008, the investment opinion system included Buy, Neutral and Sell. As of May 31, 2008, the investment opinion system includes Buy, Neutral and Underperform. Dark Grey shading indicates that a security is restricted with the opinion suspended. Light grey shading indicates that a security is under review with the opinion withdrawn. The current investment opinion key is contained at the end of the report. Chart is current as of March 31, 2011 or such later date as indicated.

Investment Rating Distribution: Utilities Group (as of 01 Apr 2011)

Coverage Universe	Count	Percent	Inv. Banking Relationships*	Count	Percent
Buy	77	42.08%	Buy	33	47.83%
Neutral	53	28.96%	Neutral	33	68.75%
Sell	53	28.96%	Sell	18	38.30%
Investment Rating Distribution: C	Global Group (as of 01 /	Apr 2011)			
Coverage Universe	Count	Percent	Inv. Banking Relationships*	Count	Percent
Buy	2009	53.66%	Buy	912	49.89%
Neutral	955	25.51%	Neutral	439	50.93%
Sell	780	20.83%	Sell	257	35.11%

* Companies in respect of which BofA Merrill Lynch or one of its affiliates has received compensation for investment banking services within the past 12 months. For purposes of this distribution, a stock rated Underperform is included as a Sell.

FUNDAMENTAL EQUITY OPINION KEY: Opinions include a Volatility Risk Rating, an Investment Rating and an Income Rating. VOLATILITY RISK RATINGS, indicators of potential price fluctuation, are: A - Low, B - Medium and C - High. INVESTMENT RATINGS reflect the analyst's assessment of a stock's: (i) absolute total return potential and (ii) attractiveness for investment relative to other stocks within its *Coverage Cluster* (defined below). There are three investment ratings: 1 - Buy stocks are expected to have a total return of at least 10% and are the most attractive stocks in the coverage cluster; 2 - Neutral stocks are expected to remain flat or increase in value and are less attractive than Buy rated stocks and 3 - Underperform stocks are the least attractive stocks in a coverage cluster. Analysts assign investment ratings considering, among other things, the 0-12 month total return expectation for a stock and the firm's guidelines for ratings dispersions (shown in the table below). The current price objective for a stock should be referenced to better understand the total return expectation at any given time. The price objective reflects the analyst's view of the potential price appreciation (depreciation).

Investment rating	Total return expectation (within 12-month period of date of initial rating)	Ratings dispersion guidelines for coverage cluster*
Buy	≥ 10%	≤ 70%
Neutral	≥ 0%	≤ 30%
Underperform	N/A	≥ 20%
* Ratings dispersions may vary from time to time where BofA Marrill Lynch Research believes it better reflects the investment prospects of stocks in a Coverage Cluster		

* Ratings dispersions may vary from time to time where BofA Merrill Lynch Research believes it better reflects the investment prospects of stocks in a Coverage Cluster

INCOME RATINGS, indicators of potential cash dividends, are: 7 - same/higher (dividend considered to be secure), 8 - same/lower (dividend not considered to be secure) and 9 - pays no cash dividend. Coverage Cluster is comprised of stocks covered by a single analyst or two or more analysts sharing a common industry, sector, region or other classification(s). A stock's coverage cluster is included in the most recent BofA Merrill Lynch Comment referencing the stock.

Price charts for the securities referenced in this research report are available at http://pricecharts.ml.com, or call 1-800-MERRILL to have them mailed. MLPF&S or one of its affiliates acts as a market maker for the equity securities recommended in the report: PG&E Corp.

The company is or was, within the last 12 months, an investment banking client of MLPF&S and/or one or more of its affiliates: PG&E Corp.

MLPF&S or an affiliate has received compensation from the company for non-investment banking services or products within the past 12 months: PG&E Corp. The company is or was, within the last 12 months, a non-securities business client of MLPF&S and/or one or more of its affiliates: PG&E Corp.

MLPF&S or an affiliate has received compensation for investment banking services from this company within the past 12 months: PG&E Corp.

MLPF&S or an affiliate expects to receive or intends to seek compensation for investment banking services from this company or an affiliate of the company within the next three months: PG&E Corp.

MLPF&S together with its affiliates beneficially owns one percent or more of the common stock of this company. If this report was issued on or after the 10th day of the month, it reflects the ownership position on the last day of the previous month. Reports issued before the 10th day of a month reflect the ownership position at the end of the second month preceding the date of the report: PG&E Corp. MLPF&S or one of its affiliates is willing to sell to, or buy from, clients the common equity of the company on a principal basis: PG&E Corp.

The analyst(s) responsible for covering the securities in this report receive compensation based upon, among other factors, the overall profitability of Bank of America Corporation, including profits derived from investment banking revenues. MLPF&S is affiliated with an NYSE Designated Market Maker (DMM) that specializes in one or more securities issued by the subject companies. This affiliated

NYSE DMM makes a market in, and may maintain a long or short position in or be on the opposite side of orders executed on the Floor of the NYSE in connection with one or more of the securities issued by these companies: PG&E Corp.

Other Important Disclosures

MLPF&S or one of its affiliates has a significant financial interest in the fixed income instruments of the issuer. If this report was issued on or after the 10th day of a month, it reflects a significant financial interest on the last day of the previous month. Reports issued before the 10th day of a month reflect a significant financial interest at the end of the second month preceding the date of the report: PG&E Corp.

Officers of MLPF&S or one or more of its affiliates (other than research analysts) may have a financial interest in securities of the issuer(s) or in related investments.

BofA Merrill Lynch Global Research policies relating to conflicts of interest are described at http://www.ml.com/media/43347.pdf. "BofA Merrill Lynch" includes Merrill Lynch, Pierce, Fenner & Smith Incorporated ("MLPF&S") and its affiliates. Investors should contact their BofA Merrill Lynch representative or Merrill Lynch Global Wealth Management financial advisor if they have questions concerning this report. Information relating to Non-US affiliates of BofA Merrill Lynch and Distribution of Affiliate Research Reports:

MLPF&S distributes, or may in the future distribute, research reports of the following non-US affiliates in the US (short name: legal name): Merrill Lynch (France): Merrill Lynch Capital Markets (France) SAS; Merrill Lynch (Frankfurt): Merrill Lynch International Bank Ltd., Frankfurt Branch; Merrill Lynch (South Africa): (France): Merrill Lynch Capital Markets (France) SAS; Merrill Lynch (Frankfurt): Merrill Lynch International Bank Ltd., Frankfurt Branch; Merrill Lynch (South Africa): Merrill Lynch South Africa (Pty) Ltd.; Merrill Lynch (Milan): Merrill Lynch International Bank Limited; MLI (UK): Merrill Lynch International; Merrill Lynch (Australia): Merrill Lynch (Canada): Merrill Lynch (Milan): Merrill Lynch (Mexico): Merrill Lynch (Asia Pacific) Limited; Merrill Lynch (Singapore): Merrill Lynch (Singapore) Pte Ltd.; Merrill Lynch (Canada): Merrill Lynch Canada Inc; Merrill Lynch (Mexico): Merrill Lynch Mexico, SA de CV, Casa de Bolsa; Merrill Lynch (Argentina): Merrill Lynch Argentina SA; Merrill Lynch (Japan): Merrill Lynch Japan Securities Co., Ltd.; Merrill Lynch (Seoul): Merrill Lynch International Incorporated (Seoul Branch); Merrill Lynch (Iavan): Merrill Lynch Securities (Taiwan) Ltd.; DSP Merrill Lynch (India): DSP Merrill Lynch CIS Limited; PT Merrill Lynch (Indonesia): PT Merrill Lynch Indonesia; Merrill Lynch (Israel): Merrill Lynch Israel Limited; Merrill Lynch (Russia): Merrill Lynch CIS Limited, Moscow; Merrill Lynch (Turkey): Merrill Lynch Yatirim Bankasi A.S.; Merrill Lynch (Dubai): Merrill Lynch International, Dubai Branch; MLPF&S (Zürich rep. office): MLPF&S Incorporated Zürich representative office; Merrill Lynch (Spain): Merrill Lynch Capital Markets Espana, S.A.S.V.; Merrill Lynch (Brazil): Banco Merrill Lynch de Investimentos S.A. This research report has been approved for publication and is distributed in the United Kingdom to professional clients and eligible counterparties (as each is defined in the rules of the Financial Services Authority) by Merrill Lynch International and Banc of America Securities Limited (BASL), which are authorized and regulated by the Financial Services Authority and has been approved for publication and is distributed in the United Kingdom to retail clients (as defined in the rules of the Financial Services Authority) by Merrill Lynch International Bank Limited, London Bra

regulated by the Financial Services Authority and has been approved for publication and is distributed in the United Kingdom to retail clients (as defined in the rules of the Financial Services Authority) by Merrill Lynch International Bank Limited, London Branch, which is authorized by the Central Bank of Ireland and is subject to limited regulation by the Financial Services Authority – details about the extent of its regulation by the Financial Services Authority are available from it on request; has been considered and distributed in Japan by Merrill Lynch Japan Securities Co., Ltd., a registered securities dealer under the Securities and Exchange Law in Japan; is distributed in Hong Kong by Merrill Lynch (Asia Pacific) Limited, which is regulated by the Hong Kong SFC and the Hong Kong Monetary Authority; is issued and distributed in Taiwan by Merrill Lynch Cecurities (Taiwan) Ltd.; is issued and distributed in India by DSP Merrill Lynch Limited; and is issued and distributed in Singapore by Merrill Lynch International Bank Limited (Merchant Bank) and Merrill Lynch (Singapore) Pte Ltd. (Company Registration No.'s F 06872E and 198602883D respectively) and Bank of America Singapore Limited (Merchant Bank). Merrill Lynch International Bank Limited (Merchant Bank). Merrill Lynch International Bank Limited (Merchant Bank). Merrill Lynch International Bank Limited (Merchant Bank). And Merrill Lynch (Singapore) Pte Ltd. are regulated by the Monetary Authority of Singapore. Merrill Lynch Equites (Australia) Limited (ABN 65 006 276 795), AFS License 235132 provides this report in Australia in accordance with section 911B of the Corporations Act 2001 and neither it nor any of its affiliates involved in preparing this research report is an Authorised Deposit-Taking Institution under the Banking Act 1959 nor regulated by the Australian Prudential Regulation Authority. No approval is required for publication or distribution of this report in Brazil. Merrill Lynch (Dubai) is authorized and regulated by the Dubai Financial

report and wishing to effect any transaction in any security discussed in the report should do so through MLPF&S and not such foreign affiliates. General Investment Related Disclosures:

This research report provides general information only. Neither the information nor any opinion expressed constitutes an offer or an invitation to make an offer, to buy or sell any securities or other financial instrument or any derivative related to such securities or instruments (e.g., options, futures, warrants, and contracts for differences). This report is not intended to provide personal investment advice and it does not take into account the specific investment objectives, financial situation and the particular needs of any specific person. Investors should seek financial advice regarding the appropriateness of investing in financial instruments and implementing investment strategies discussed or recommended in this report and should understand that statements regarding future prospects may not be realized. Any decision to purchase or subscribe for securities in any offering must be based solely on existing public information on such security or the information in the

Any decision to put chase of subscribe for securities in any offening must be based solely of existing public information of such security of the information in the prospectus or other offering document issued in connection with such offering, and not on this report. Securities and other financial instruments discussed in this report, or recommended, offered or sold by Merrill Lynch, are not insured by the Federal Deposit Insurance Corporation and are not deposits or other obligations of any insured depository institution (including, Bank of America, N.A.). Investments in general and, derivatives, in particular, involve numerous risks, including, among others, market risk, counterparty default risk and liquidity risk. No security, financial instrument or derivative is suitable for all investors. In some cases, securities and other financial instruments may be difficult to value or sell and reliable information about the value or risks related to the security or financial instrument may be difficult to obtain. Investors should note that income from such securities and other financial instruments, if any, may fluctuate and that price or value of such securities and instruments may rise or fall and, in some cases, investors may lose their entire principal investment. Past performance is not necessarily a guide to future performance. Levels and basis for taxation may change.

This report may contain a short-term trading idea or recommendation, which highlights a specific near-term catalyst or event impacting the company or the market that is anticipated to have a short-term price impact on the equity securities of the company. Short-term trading ideas and recommendations are different from and do not affect a stock's fundamental equity rating, which reflects both a longer term total return expectation and attractiveness for investment relative to other stocks within its Coverage Cluster. Short-term trading ideas and recommendations may be more or less positive than a stock's fundamental equity rating.

Both Merrill Lynch is aware that the implementation of the ideas expressed in this report may depend upon an investor's ability to "short" securities or other financial instruments and that such action may be limited by regulations prohibiting or restricting "shortselling" in many jurisdictions. Investors are urged to seek advice regarding the applicability of such regulations prior to executing any short idea contained in this report.

Foreign currency rates of exchange may adversely affect the value, price or income of any security or financial instrument mentioned in this report. Investors in

Such securities and instruments, including ADRs, effectively assume currency risk. UK Readers: The protections provided by the U.K. regulatory regime, including the Financial Services Scheme, do not apply in general to business coordinated by BofA Merrill Lynch entities located outside of the United Kingdom. BofA Merrill Lynch Global Research policies relating to conflicts of interest are described at http://www.ml.com/media/43347.pdf.

Officers of MLPF&S or one or more of its affiliates (other than research analysts) may have a financial interest in securities of the issuer(s) or in related investments.

MLPF&S or one of its affiliates is a regular issuer of traded financial instruments linked to securities that may have been recommended in this report. MLPF&S or one of its affiliates may, at any time, hold a trading position (long or short) in the securities and financial instruments discussed in this report.

BofA Merrill Lynch, through business units other than BofA Merrill Lynch Global Research, may have issued and may in the future issue trading ideas or recommendations that are inconsistent with, and reach different conclusions from, the information presented in this report. Such ideas or recommendations reflect the different time frames, assumptions, views and analytical methods of the persons who prepared them, and BofA Merrill Lynch is under no obligation to ensure that such other trading ideas or recommendations are brought to the attention of any recipient of this report.

In the event that the recipient received this report pursuant to a contract between the recipient and MLPF&S for the provision of research services for a separate fee, and in connection therewith MLPF&S may be deemed to be acting as an investment adviser, such status relates, if at all, solely to the person with whom MLPF&S has contracted directly and does not extend beyond the delivery of this report (unless otherwise agreed specifically in writing by MLPF&S). MLPF&S is and continues to act solely as a broker-dealer in connection with the execution of any transactions, including transactions in any securities mentioned in this report. Copyright and General Information regarding Research Reports:

Copyright 2011 Merrill Lynch, Pierce, Fenner & Smith Incorporated. All rights reserved. iQmethod, iQmethod 2.0, iQprofile, iQtoolkit, iQworks are service marks of Merrill Lynch & Co., Inc. iQanalytics®, iQcustom®, iQdatabase® are registered service marks of Merrill Lynch & Co., Inc. This research report is prepared for the use of BofA Merrill Lynch clients and may not be redistributed, retransmitted or disclosed, in whole or in part, or in any form or manner, without the express written consent of BofA Merrill Lynch. BofA Merrill Lynch Global Research reports are distributed simultaneously to internal and client websites and other portals by BofA Merrill Lynch and are not publicly-available materials. Any unauthorized use or disclosure is prohibited. Receipt and review of this research report constitutes your agreement not to redistribute, retransmit, or disclose to others the contents, opinions, conclusion, or information contained in this report (including any investment recommendations, estimates or price targets) without first obtaining expressed permission from an authorized officer of BofA Merrill Lynch.

Materials prepared by BofA Merrill Lynch Global Research personnel are based on public information. Facts and views presented in this material have not been reviewed by, and may not reflect information known to, professionals in other business areas of BofA Merrill Lynch, including investment banking personnel. BofA Merrill Lynch has established information barriers between BofA Merrill Lynch Global Research and certain business groups. As a result, BofA Merrill Lynch does not disclose certain client relationships with, or compensation received from, such companies in research reports. To the extent this report discusses any legal proceeding or issues, it has not been prepared as nor is it intended to express any legal conclusion, opinion or advice. Investors should consult their own legal advisers as to issues of law relating to the subject matter of this report. BofA Merrill Lynch Global Research personnel's knowledge of legal proceedings in which any DefA Merrill Lynch Global Research personnel's knowledge of legal proceedings in which any BofA Merrill Lynch entity and/or its directors, officers and employees may be plaintiffs, defendants, co-defendants or co-plaintiffs with or involving companies mentioned in this report is based on public information. Facts and views presented in this material that relate to any such proceedings have not been reviewed by, discussed with, and may not reflect information known to, professionals in other business areas of BofA Merrill Lynch in connection with the legal proceedings or matters relevant to such proceedings.

This report has been prepared independently of any issuer of securities mentioned herein and not in connection with any proposed offering of securities or as agent of any issuer of any securities. None of MLPF&S, any of its affiliates or their research analysts has any authority whatsoever to make any representation or warranty on behalf of the issuer(s). BofA Merrill Lynch Global Research policy prohibits research personnel from disclosing a recommendation, investment rating, or investment thesis for review by an issuer prior to the publication of a research report containing such rating, recommendation or investment thesis

Any information relating to the tax status of financial instruments discussed herein is not intended to provide tax advice or to be used by anyone to provide tax advice. Investors are urged to seek tax advice based on their particular circumstances from an independent tax professional.

The information herein (other than disclosure information relating to BofA Merrill Lynch and its affiliates) was obtained from various sources and we do not guarantee its accuracy. This report may contain links to third-party websites. BofA Merrill Lynch is not responsible for the content of any third-party website or any linked content contained in a third-party website. Content contained on such third-party websites is not part of this report and is not incorporated by reference into this report. The inclusion of a link in this report does not imply any endorsement by or any affiliation with BofA Merrill Lynch. Access to any third-party website is at your own risk, and you should always review the terms and privacy policies at third-party websites before submitting any personal information to them. BofA Merrill Lynch is not responsible for such terms and privacy policies and expressly disclaims any liability for them.

Subject to the quiet period applicable under laws of the various jurisdictions in which we distribute research reports and other legal and BofA Merrill Lynch policy-related restrictions on the publication of research reports, fundamental equity reports are produced on a regular basis as necessary to keep the investment recommendation current.

Certain outstanding reports may contain discussions and/or investment opinions relating to securities, financial instruments and/or issuers that are no longer current. Always refer to the most recent research report relating to a company or issuer prior to making an investment decision. In some cases, a company or issuer may be classified as Restricted or may be Under Review or Extended Review. In each case, investors should consider any

investment opinion relating to such company or issuer (or its security and/or financial instruments) to be suspended or withdrawn and should not rely on the analyses and investment opinion(s) pertaining to such issuer (or its securities and/or financial instruments) nor should the analyses or opinion(s) be considered a solicitation of any kind. Sales persons and financial advisors affiliated with MLPF&S or any of its affiliates may not solicit purchases of securities or financial instruments that are Restricted or Under Review and may only solicit securities under Extended Review in accordance with firm policies.

Neither BofA Merrill Lynch nor any officer or employee of BofA Merrill Lynch accepts any liability whatsoever for any direct, indirect or consequential damages or losses arising from any use of this report or its contents.