Special Comment

Moody's Global Infrastructure Finance

June 2009

Table of Contents:

| Summary | 1 |
|--|----|
| Overview | 2 |
| Nuclear's "bet-the-farm" risk | 2 |
| Historical rating trends are not good | 3 |
| Plant construction can pressure metrics | 5 |
| Precedents offer limited insight | 5 |
| Metrics show no meaningful improvement | 7 |
| Benefits of near-term recovery are limited | 8 |
| Public Power and Cooperatives are positioned with flexible cost recovery | |
| mechanisms but rate pressure is expected | 8 |
| Is size an issue? | 9 |
| Conclusion | 9 |
| Appendix A: Historical rating actions | 11 |
| Moody's Related Research | 13 |
| | |

Analyst Contacts:

New York

1.212.553.1653

Jim Hempstead

Senior Vice President

Dan Aschenbach

Senior Vice President

A.J. Sabatelle

Senior Vice President

Mike Haggarty

Vice President - Senior Credit Officer

Laura Schumacher

Vice President - Senior Analyst

William L. Hess

Team Managing Director

New Nuclear Generation: Ratings Pressure Increasing

Summary

- Moody's is considering taking a more negative view for those issuers seeking to build new nuclear power plants
- Rationale is premised on a material increase in business and operating risk
- Longer-term value proposition appears intact, and, once operating, nuclear plants are viewed favorably due to their economics and no-carbon emission footprint
- Historically, most nuclear-building utilities suffered ratings downgrades and sometimes several—while building these facilities
- Political and policy conditions are spurring applications for new nuclear power generation for the first time in years
- Nevertheless, most utilities now seeking to build nuclear generation do not appear to be adjusting their financial policies, a credit negative
- First federal approvals are at least two years away, and economic, political and policy equations could easily change before then
- Progress continues slowly on Federal Loan Guarantees, which will provide a lower-cost source of funding but will only modestly mitigate increasing business and operating risk profile
- Partnerships, balance sheet strengthening, bolstering liquidity reserves and "back-to-basics" approaches to core operations could help would-be nuclear utilities maintain their ratings

This Special Comment is an addendum to our prior research reports associated with the credit implications of building new nuclear generation in the U.S. These prior reports, entitled "New Nuclear Generating Capacity: Potential Credit Implications for U.S. Investor Owned Utilities" published in May 2008 and "New Nuclear Generation in the United States: Keeping Options Open vs Addressing An Inevitable Necessity" published in October 2007 are referenced in the back under the section Moody's Related Research.



Overview

It has now been three decades since the last, serious nuclear construction cycle. The 1979 accident at Pennsylvania's Three Mile Island nuclear power plant appears to have permanently affected the nation's views about building new nuclear power generation. As a result, substantial new regulatory procedures were implemented. Development and construction costs soared, recovery was challenged, and for many issuers, financial deterioration and ratings downgrades followed. For some, ratings recovery took years.

But while nuclear power remains a thorny political and policy issue today, the concept of building new facilities has gradually reawakened in recent years, offering a buffer against foreign energy dependence, unpredictable commodity prices, and heavily polluting fuel sources. As a result, several of the largest U.S. power companies in recent years have announced plans to pursue new nuclear generation.

This may eventually boost the country's options for power generation. But from a credit perspective, the risks of building new nuclear generation are hard to ignore, entailing significantly higher business and operating risk profiles, with construction risk, huge capital costs, and continual shifts in national energy policy. Project risks are somewhat more clear today than during the last build cycle, in the 1970s, since we now have a track record that measures nuclear power's operating performance; strong plant economics due to low fuel cost; proven efficient and safe operating capabilities; new and refined regulatory procedures; and more certainty over reactor designs before construction begins.

Less clear today is the effect that energy efficiency programs and national renewable standards might have on the demand for new nuclear generation. National energy policy has also begun eyeing lower carbon emissions as a key desire for energy production—theoretically a huge benefit for new nuclear generation—but the price tags associated with these development efforts are daunting, especially in light of today's economic turmoil. It isn't clear what effect such shifts, or changes in technology, will have for new nuclear power facilities.

Credit conditions are yet another question. Few, if any, of the issuers aspiring to build new nuclear power have meaningfully strengthened their balance sheets, and for several companies, key financial credit ratios have actually declined. Moreover, recent broad market turmoil calls into question whether new liquidity is even available to support such capital-intensive projects. (The U.S. Nuclear Regulatory Commission's (NRC) first Construction and Operating Licenses, or COLs, are expected to win approval in roughly 24-36 months, after which investment in these projects could well increase significantly.)

Moody's is considering applying a more negative view for issuers that are actively pursuing new nuclear generation. History gives us reason to be concerned about possible significant balance-sheet challenges, the lack of tangible efforts today to defend the existing ratings, and the substantial execution risk involved in building new nuclear power facilities.

Nuclear's "bet-the-farm" risk

The NRC says about 14 companies to date have submitted COL applications, proposing numerous new nuclear reactors for power generation. The first of these COL's is expected to be approved beginning in mid-2011. Many of the COL license applications include partners, but the next table lists the primary holding company entity behind each project, and our view of the activity level associated with the endeavor.

From a credit perspective, companies that pursue new nuclear generation will take on a higher business and operating risk profile, pressuring credit ratings over the intermediate- to long-term. Even so, we also believe companies will ultimately revise their corporate-finance policies to begin materially strengthening balance sheets and bolstering available liquidity capacity at the start of the construction cycle. In addition, we believe regulators will generally continue to support the long-term financial health of the utilities they regulate, and will authorize recovery of investments and costs over a reasonable timeframe.

Moody's believes there is a significant difference between new nuclear plants located adjacent to existing units from those that are greenfield projects. In our opinion, brown-field projects benefit from the existing infrastructure (including security plans), local political support and historical operating record of the existing units. We believe the U.S. Department of Energy also recognized this as well in the selection of the Southern Company's Vogtle; NRG's South Texas Project, SCANA's Summer and Constellation's Calvert Cliffs / Nine Mile projects. We ascribe a "high" activity level for these projects.

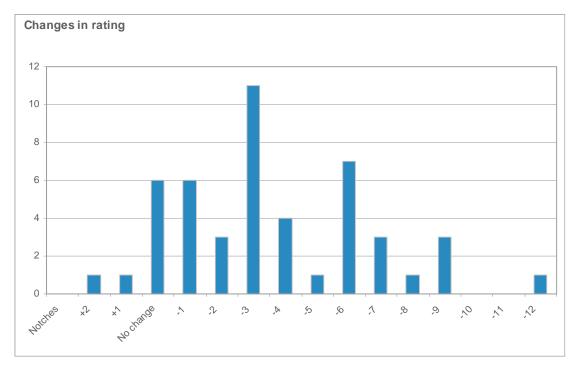
Many of the development plans appear to have been slowed down over the past 6 - 12 months for various reasons. We ascribe a "low" activity level to those projects. Other may have slowed down only modestly. For these projects, we ascribe a "medium" activity level.

Table 1: COL applications received by the NRC

| Company | Sr. Unsec. | Reactor Design | Proposed New Reactor | Activity Level |
|------------------------|---------------|-------------------|-------------------------|----------------|
| Ameren | Baa3 | US EPR | Callaway | Low |
| Constellation | Baa3 | US EPR | Calvert Cliffs | High |
| Constellation | Baa3 | US EPR | Nine Mile Point | High |
| Dominion | Baa2 | ESBWR | North Anna | Low |
| DTE Energy | Baa1 | ESBWR | Fermi | Low |
| Duke Energy | Baa2 | AP 1000 | William S Lee | Medium |
| Energy Future Holdings | B3 CFR | US APWR | Comanche Peak | Low |
| Entergy | Baa3 | ESBWR | Grand Gulf | Low |
| Entergy | Baa3 | ESBWR | River Bend | Low |
| Exelon | Baa1 | ESBWR | Victoria County | Low |
| NRG Energy | Ba3 CFR | ABWR | South Texas Project | High |
| PPL | Baa2 | US EPR | Bell Bend | Medium |
| Progress | Baa2 | AP 1000 | Levy County | Medium |
| Progress | Baa2 | AP 1000 | Shearon Harris | Low |
| SCANA | Baa1 | AP 1000 | V.C. Summer | High |
| Southern | A3 | AP 1000 | Vogtle | High |
| TVA | Aaa | AP 1000 | Bellefonte | Low |

Historical rating trends are not good

Historical rating actions have been unfavorable for issuers seeking to build new nuclear generation. Of 48 issuers that we evaluated during the last nuclear building cycle (roughly 1965-1995), two received rating upgrades, six went unchanged, and 40 had downgrades. Moreover, the average downgraded issuer fell four notches. All of these ratings were evaluated on the senior secured or first mortgage bond ratings.



We view new nuclear generation plans as a "bet the farm" endeavor for most companies, due to the size of the investment and length of time needed to build a nuclear power facility. While we continue to view operating nuclear units positively, we increasingly sense that none of the issuers actively pursuing these endeavors have taken any material actions to strengthen their balance sheets. As a result, it has become increasingly likely that the pursuit of new nuclear power projects will lead to some near-term rating actions or outlook changes.

This table highlights the credit metrics some of the issuers that appear most aggressive in their nuclear development plans.

Table 2: Selected utilities actively pursuing new nuclear generation

| Company | Sector | Sr. Unsec. | Rating Outlook | 2008 Debt* | 2008 Revenue* | Debt / Revenue |
|--|-------------|---------------|-------------------|---------------|------------------|-------------------|
| South Carolina Electric & Gas | IOU | A3 | Stable | \$3,464 | \$2,816 | 123% |
| South Carolina Public Service Authority (Santee Cooper) | Municipal | Aa2 | Stable | \$3,715 | \$1,586 | 234% |
| | | | | | | |
| Georgia Power | IOU | A2 | Stable | \$8,156 | \$8,412 | 97% |
| Municipal Electric Authority of Georgia | Municipal | A1 | Stable | \$3,390 | \$772 | 439% |
| Power South | Cooperative | Baa1 | Stable | \$1,398 | \$750 | 186% |
| Oglethorpe | Cooperative | Baa1 | Stable | \$3,910 | \$1,239 | 316% |
| | | | | | | |
| San Antonio CPS | Municipal | Aa1 | Stable | \$3,600 | \$2,200 | 164% |
| City of Austin | Municipal | A1 | Positive | \$1,600 | \$1,200 | 133% |
| NRG Energy | Unregulated | Ba3 CFR | RUR-up | \$9,275 | \$6,885 | 135% |

^{*} in \$ millions

Plant construction can pressure metrics

The sheer size, cost and complexity of new nuclear construction projects will increase a utility's or power company's business and operating risk profile, leading to downward rating pressure. The length of a nuclear construction effort also entails lengthy regulatory reviews and potential delays in recovering investments, changing market conditions, shifting political and policy agendas, and technological developments on both the supply and demand side.

Given these long-term risks, a company's financial policy becomes especially critical to its overall credit profile during construction. In general, we believe a company should prepare for the higher risk associated with construction by maintaining, if not strengthening, its balance sheet, and by maintaining robust levels of available liquidity capacity.

This is crucial, because our preliminary analysis suggests that credit metrics will deteriorate meaningfully without significant mitigating factors or other structural provisions. As cash outflows materially begin to outpace inflows, leverage is expected to increase and metrics related to cash flow are expected to decline. A weakening financial profile, coupled with increasing business and operating risk, should result in credit deterioration.

Precedents offer limited insight

Much has changed since the last major nuclear-generation construction cycle (1965-1995). The industry has learned from experience, including up-front regulatory oversight of development and investment; streamlined federal NRC approval procedures; and enhanced construction cycles and techniques.

In addition, new environmental regulations, specifically those aimed at reducing carbon dioxide emissions; appear well positioned for near-term implementation. These environmental developments should otherwise bolster the case for new nuclear generation, as it is viewed as one of the only large scale generation technology with a no-carbon footprint.

We are not questioning the arguments in favor of new large-scale nuclear generation. We observe, however, that nuclear projects require massive investments, and the long-term recovery of which presents a primary risk factor for issuers actively trying to build new nuclear power plants. Historically, in fact, many of the large nuclear utilities experienced some financial distress while building their plants. Material rating downgrades remain just as distinct a possibility today.

Issuer experience varied during the last U.S. nuclear build cycle, which we define as 1965-1995. This table is not meant to be all-inclusive (it excludes several issuers, such as Portland General and its Trojan nuclear plant. Although almost all issuers experienced rating downgrades to varying degrees, and not all of the downgrades may have been directly related to nuclear development, it was clearly either a primary or contributing factor in most cases.

Table 3: Precedent rating actions for utilities involved in nuclear development

| Issuer | Period | Beginning rating | Lowest rating | Notche moved |
|---|-----------|---------------------|------------------|-----------------|
| | | | Ü | |
| Alabama Power Arizona Public Service | 1975-1987 | A2 FMB A2 FMB | Baa3 Baa3 | 4 |
| | 1981-1993 | A2 FMB | A2 | 4 |
| Baltimore Gas & Electric | 1974-1979 | | | |
| Cleveland Electric Illuminating | 1981-1993 | Aa2 FMB | Baa3 | 7 5 |
| Commonwealth Edison | 1968-1990 | Aa2 FMB | Baa1 | |
| Connecticut Light & Power | 1972-1978 | Aa2 FMB | A2 | 3 |
| Consolidated Edison Co of NY | 1972-1978 | A2 FMB | Baa2 | 3 |
| Consumers Energy | 1969-1974 | Aaa FMB | Aa2 | 2 |
| Detroit Edison | 1985-1992 | Baa1 SS | Baa2 | 1 |
| Duke Energy Carolinas | 1972-1986 | Aa2 FMB | A2 | 3 |
| Duquesne Light | 1974-1988 | Aa2 FMB | Baa2 | 6 |
| Entergy Arkansas | 1973-1979 | A2 FMB | Baa2 | 3 |
| Entergy Gulf States | 1980-1988 | A2 FMB | Ba3 | 7 |
| Entergy Louisiana | 1983-1988 | Baa3 FMB | Ba2 | 2 |
| Entergy Mississippi | 1981-1987 | A2 FMB | Ba2 | 6 |
| Florida Power & Light | 1972-1984 | Aa2 FMB | A2 | 3 |
| Georgia Power | 1975-1990 | Baa2 FMB | Baa2 | |
| Houston Light & Power | 1987-1994 | A2 FMB | A3 | 1 |
| Illinois Power | 1984-1989 | A2 FMB | Baa3 | 4 |
| Indiana Michigan Power | 1973-1979 | A2 FMB | Baa2 | 3 |
| lowa Electric Light & Power | 1973-1977 | Aa2 FMB | Baa2 | 6 |
| Jersey Central Power & Light | 1968-1980 | A2 FMB | Ba2 | 6 |
| Kansas Gas & Electric | 1982-1986 | Baa2 FMB | Baa3 | 1 |
| Long Island Lighting | 1972-1990 | Aa2 FMB | B2 | 12 |
| Metropolitan Edison | 1973-1984 | A2 FMB | B2 | 9 |
| New England Power | 1971-1992 | Aa2 FMB | A1 | 2 |
| Niagara Mohawk Power | 1968-1988 | Aaa FMB | Baa2 | 8 |
| Northern Indiana Public Service | 1973-1985 | Aa2 FMB | Baa2 | 6 |
| Northern States Power (MN) | 1970-1976 | Aa2 FMB | Aa2 | |
| NSTAR Electric | 1971-1990 | Aa2 FMB | Baa2 | 6 |
| Ohio Edison | 1975-1988 | Aa2 FMB | Baa3 | 7 |
| Pacific Gas & Electric | 1983-1988 | A1 FMB | A1 | |
| Philadelphia Electric Company | 1973-1991 | Aaa FMB | Baa3 | 9 |
| PPL Electric Utilities | 1982-1986 | Aa2 FMB | A2 | 3 |
| Progress Energy Carolinas | 1970-1987 | Aa2 FMB | Baa2 | 6 |
| Progress Energy Florida | 1975-1981 | A2 FMB | A2 | |
| Public Service Co of Colorado | 1976-1990 | Aa2 FMB | А3 | 4 |
| Public Service Co of New Hampshire | 1980-1991 | Baa2 FMB | Caa2 | 9 |
| Public Service Electric & Gas | 1973-1987 | Aa2 FMB | Aa3 | 1 |
| Puget Sound Energy | 1978-1986 | Baa2 FMB | А3 | +2 |
| Rochester Gas & Electric | 1969-1975 | Aa2 FMB | A2 | 3 |
| South Carolina Electric & Gas | 1979-1985 | A2 FMB | A1 | +1 |
| Southern California Edison | 1979-1985 | Aa2 FMB | Aa2 | |

| Issuer | Period | Beginning rating | Lowest rating | Notches moved |
|-----------------------------|-----------|---------------------|------------------|------------------|
| Texas Utilities | 1989-1995 | Baa3 FMB | Baa3 | 1 |
| Toledo Edison | 1977-1988 | Baa2 FMB | Baa3 | 1 |
| Union Electric | 1980-1988 | A2 FMB | Baa2 | 3 |
| Virginia Electric and Power | 1971-1982 | Aa2 FMB | A2 | 3 |
| Wisconsin Public Service | 1969-1975 | Aa2 FMB | A2 | 3 |

Metrics show no meaningful improvement

Among electric utilities—both non-nuclear and nuclear vertically integrated companies—many key financial credit metrics have remained reasonably steady in recent times. While a stable financial profile reflects our sense of the sector's relative stability and predictability, we are becoming increasingly concerned that the nuclear utilities do not appear likely to see any meaningful improvement over the near to intermediate term.

Because companies that build new nuclear generation will increase their overall business and operating risk profiles, we believe they will need to compensate with near-term financial policies that produce strong financial credit ratios. While a constructive regulatory relationship will help mitigate near-term credit pressures, we will remain on guard for potential construction delays and cost overruns that could lead to future rate shock and/or disallowances of cost recovery. Given the lengthy construction time needed for nuclear projects, there is no guarantee that tomorrow's regulatory, political, or fuel environments will be as supportive to nuclear power as today's.

Table 4: Credit comparisons of nuclear and non-nuclear utilities

| | Integrated Utility (non-nuclear) Average of 38 companies in peer group | | | Integrated Utility (nuclear) Average of 25 companies in peer group | | | | |
|--|--|------|------|---|------|------|------|------|
| | 7-yr | 5-yr | 3-yr | 2008 | 7-yr | 5-yr | 3-yr | 2008 |
| Debt / Capitalization | 43% | 43% | 42% | 44% | 42% | 42% | 42% | 43% |
| Debt / EBITDA | 3.8 | 3.2 | 3.3 | 3.8 | 3.0 | 3.0 | 3.3 | 3.3 |
| Debt / Revenues | 82% | 80% | 79% | 83% | 84% | 82% | 81% | 86% |
| CFO / Debt | 23% | 22% | 22% | 18% | 26% | 26% | 26% | 24% |
| (CFO Pre-W/C) / Debt | 24% | 23% | 22% | 22% | 27% | 26% | 26% | 25% |
| FFO / Debt | 26% | 25% | 24% | 24% | 27% | 27% | 26% | 24% |
| EBITDA / Interest Expense | 6.4 | 6.5 | 6.4 | 6.0 | 6.6 | 6.7 | 6.4 | 6.3 |
| (CFO Pre-W/C + Interest) / Interest Expense | 5.5 | 5.5 | 5.3 | 5.3 | 5.8 | 5.9 | 5.9 | 6.0 |
| (CFO Pre-W/C-Dividends) / Capex | 78% | 72% | 61% | 60% | 89% | 83% | 76% | 69% |
| (CFO Pre-W/C-Dividends) / Debt | 17% | 17% | 17% | 17% | 20% | 20% | 20% | 20% |

We can apply the same general financial-profile views to the parent companies that are now pursuing new nuclear construction:

Table 5: Credit conditions of parent companies seeking to build nuclear power generation

| | Avera | Parent - ge of 14 comp | | r group |
|--|-------|---------------------------|------|---------|
| | 7-yr | 5-yr | 3-yr | 2008 |
| Debt / Capitalization | 55% | 54% | 54% | 56% |
| Debt / EBITDA | 3.8 | 3.6 | 3.2 | 1.2 |
| Debt / Revenues | 131% | 121% | 123% | 126% |
| CFO / Debt | 17% | 18% | 18% | 16% |
| (CFO Pre-W/C) / Debt | 18% | 19% | 20% | 18% |
| FFO / Debt | 19% | 20% | 20% | 19% |
| EBITDA / Interest Expense | 4.5 | 4.7 | 4.8 | 4.3 |
| (CFO Pre-W/C + Interest) / Interest Expense | 4.2 | 4.4 | 4.4 | 4.2 |
| (CFO Pre-W/C-Dividends) / Capex | 101% | 109% | 87% | 75% |
| (CFO Pre-W/C-Dividends) / Debt | 14% | 15% | 15% | 13% |

Benefits of near-term recovery are limited

New nuclear power construction appears to enjoy strong political and regulatory support in a number of jurisdictions, especially in the southeastern states, where there is now legislation afoot to promote it. This support typically involves the regulators in the decision-making process on the business side; regular reviews of the sponsors' capital budgets; and real-time recovery of financing and other charges associated with the construction process.

Nevertheless, regulatory risks will persist over the longer term, and we increasingly think it unlikely that everything will work out as intended. We are concerned with the size of the investments being made even before the NRC grants a COL; the ongoing potential risks from displacement technology developments over the course of the construction period; and the recovery of sizeable sunk costs, should an issuer abandon a project in the future.

These longer-term risks are difficult to quantify today, but the possibility of abandoning a construction project should not be fully dismissed, regardless of the low probability of such an occurrence today. We remain concerned that should an issuer walk away from a nuclear project, for whatever reason, its multi-billion investment may not be fully recovered, or it may be amortized over a long-term period. This could introduce some material financial distress for almost any issuer.

Public Power and Cooperatives are positioned with flexible cost recovery mechanisms but rate pressure is expected

A number of municipally owned and not-for-profit cooperatives are partners in several new nuclear development projects. Several of these issuers have already begun raising significant amounts of debt to finance their share of the up-front development costs associated with these projects.

Public power utilities have begun to take proactive approaches to their participation in these projects to mitigate the burden. The Municipal Electric Authority of Georgia, for example, built a sizable reserve in excess of \$700 million and found off takers for some of its initial ownership share to mitigate the financial burden of its ownership in the Vogtle 3 and 4 nuclear project. San Antonio CPS has begun to educate its customer base and to examine its rate process to begin to fund construction in advance of the construction schedule.

Nevertheless, despite their more levered balance sheets, we still consider the municipals and cooperatives better-positioned than the investor-owned utilities, because of their self-regulating rate authorities.

Yet one of the challenges associated with pursuing a new nuclear project is the size of the investment. These entities—like their investor-owned counterparts—risk the prospect that their customers will be unable to absorb steadily increasing rates. Ongoing economic turmoil in the U.S. amplifies this risk over the near to intermediate term and municipals and cooperatives do not have an ability to raise equity capital.

Is size an issue?

One possible solution might be for utilities to create partnerships for building new nuclear generation, thereby diluting this risk through various sharing mechanisms. Even some of the largest utility and power companies in our sector pale in comparison to the largest industrial customers, and to the foreign power companies, some of which could be strong candidates for such partnerships:

Table 6: Relative size comparison of other energy companies

| Company | Sr. Unsec. | 2008 Debt* | 2008 Revenue* | 2008 Assets |
|-----------------------------|---------------|---------------|---------------|-------------|
| Large energy companies | | | | |
| Electricity de France (EdF) | Aa3 | \$82,985 | \$87,833 | \$279,618 |
| Exxon Mobil | Aaa | \$56,596 | \$425,071 | \$295,024 |
| BP plc | Aa1 | \$58,862 | \$361,143 | \$250,816 |
| | | | | |
| U.S. UTILITIES | | | | |
| Exelon | Baa1 | \$18,069 | \$18,859 | \$48,524 |
| Southern | A3 | \$20,276 | \$17,127 | \$49,380 |
| Duke Energy | Baa2 | \$16,721 | \$13,207 | \$53,968 |
| SCANA Corporation | Baa1 | \$4,972 | \$5,319 | \$11,567 |
| NRG Energy | Ba3 CFR | \$9,275 | \$6,885 | \$25,071 |

^{*} in \$ millions

Conclusion

The likelihood that Moody's will take a more negative rating position for most issuers actively seeking to build new nuclear generation is increasing. With only about 24 months remaining before the NRC begins issuing licenses for new projects and major investment begins, few of the issuers we currently rate have taken any meaningful steps to strengthen their balance sheets. Considering these new projects tend to raise an issuer's business and operating risk profiles, the utility's overall credit profile appears weaker.

Most issuers still have some time to revise their financing policies. Even so, we are concerned that the turmoil in the financial markets, continued uncertainty associated with Federal loan guarantees, and the general tenor associated with bank credit facilities and liquidity will make such revisions more difficult in the future.

In order to defend existing ratings, or to limit negative rating actions, we will look for investor-owned utilities to:

- create strategic partnerships, to share costs and risks;
- increase reliance on equity as a component to financing plans;
- moderate their dividend policies to retain cash flow; and
- adopt a "back-to-basics" focus on core electric utility operations, posing less distraction for management

In addition to this "back to basics" focus on core operations and management, we would expect municipal and cooperative utilities to increase up-front rates to consumers, in order to build liquidity cushions and prevent rate shocks.

From a risk mitigation perspective, the prospect of seeking business partners—particularly major multinational energy companies with some experience in the nuclear arena—might also be worth exploring as a good way to preserve liquidity and cash flow, while still reaping the benefits of new nuclear power generation.

Appendix A: Historical rating actions

| Issuer | Period | Comment | Reactor |
|---------------------------------|-----------|---|---|
| Alabama Power | 1975-1987 | A2 FMB downgraded to Baa2 in 1976, Baa3 in 1982, followed by multiple rating upgrades in 1983, 1984, 1985, 1986 | Farley |
| Arizona Public Service | 1981-1993 | A2 FMB downgraded to A3 in 1982, Baa2 in 1984, Baa3 in 1989; upgraded to Baa2 in 1992 | Palo Verde |
| Baltimore Gas & Electric | 1974-1979 | A2 FMB | Calvert Cliffs |
| Cleveland Electric Illuminating | 1981-1993 | Aa2 FMB downgraded to A2 in 1981, A3 in 1984, Baa2 in 1985, Baa3 in 1993 | Perry |
| Commonwealth Edison | 1968-1990 | Aa2 FMB downgraded to A2 in 1980, A3 in 1984, Baa1 in 1987 | Dresden / Quad Cities / Zion / LaSalle / Byron / Braidwood |
| Connecticut Light & Power | 1972-1978 | Aa2 FMB downgraded to A2 in 1974 | Conn. Yankee / Yankee Rowe |
| Consolidated Edison Co of NY | 1972-1978 | A2 FMB downgraded to Baa2 in 1974 | Indian Point |
| Consumers Energy | 1969-1974 | Aaa FMB downgraded to Aa2 in 1972 | Palisades |
| Detroit Edison | 1985-1992 | Baa3 Sr. Sec. upgraded to Baa1 in 1985, downgraded to Baa2 in 1987 followed by upgrades to Baa1 in 1990, A3 in 1991 | Fermi |
| Duke Energy Carolinas | 1972-1986 | Aa2 FMB downgraded to A2 in 1973; upgraded to A1 1982, Aa3 in 1983 and Aa2 in 1984 | Oconee / McGuire / Catawba |
| Duquesne Light | 1974-1988 | Aa2 FMB downgraded to A2 in 1979, A3 in 1982, Baa1 in 1984 and Baa2 in 1987 | Beaver Valley |
| Entergy Arkansas | 1973-1979 | A2 FMB downgraded to Baa2 in 1974 | Arkansas Nuclear |
| Entergy Gulf States | 1980-1988 | A2 FMB downgraded to Baa2 in 1982, Baa3 in 1984, follow by upgrade to Baa2 in 1985 and downgrade to Ba2 in 1986 and to Ba3 in 1987 | Riverbend |
| Entergy Louisiana | 1983-1988 | Baa3 FMB downgraded to Ba2 in 1985, followed by upgrade to Baa2 in 1986, downgraded to Ba2 in 1988 then upgraded back to Baa3 in 1988 | Waterford |
| Entergy Mississippi | 1981-1987 | A2 FMB downgraded to A3 and again to Baa2 in 1982, downgraded to Ba2 in 1985, followed by upgrades to Baa2 and again to Baa1 in 1986 | Grand Gulf |
| Florida Power & Light | 1972-1984 | Aa2 FMB downgraded to A2 in 1974, followed by upgrades to A1 in 1982 and Aa3 in 1984 | Turkey Point / St. Lucie |
| Georgia Power | 1975-1990 | Baa2 FMB upgraded to Baa1 in 1982, downgraded to Baa2 in 1987 | Hatch / Vogtle |
| Houston Light & Power | 1987-1994 | A2 FMB downgraded to A3 in 1989, upgraded to A2 in 1993 | South Texas Project |
| Illinois Power | 1984-1989 | A2 FMB downgraded to A3 in 1986, to Baa2 in 1988 and Baa3 in 1989 | Clinton |
| Indiana Michigan Power | 1973-1979 | A2 FMB downgraded to Baa2 in 1975 | Cook |
| lowa Electric Light & Power | 1973-1977 | Aa2 FMB downgraded to A2 in 1974, to Baa2 in 1975, followed by upgrade to A2 in 1977 | Duane Arnold |
| Jersey Central Power & Light | 1968-1980 | A2 FMB downgraded to Baa2 in 1972 and Ba2 in 1980 | Oyster Creek / Three Mile Islar |
| Kansas Gas & Electric | 1982-1986 | Baa2 FMB downgraded to Baa3 in 1982, upgraded to Baa2 in 1986 | Wolf Creek |
| Long Island Lighting | 1972-1990 | Aa2 Sr. Sec. downgraded to A2 in 1979, to Baa2 in 1980, upgraded to Baa1 in 1982, followed by downgrade to Baa3 in 1983, to B2 quickly followed by upgrade to Ba3 in 1984, Ba1 in 1989 and Baa3 in 1990 | Shoreham |
| Metropolitan Edison | 1973-1984 | A2 FMB downgraded to Baa2 in 1979, B2 in 1980 followed by upgrade to Ba2 in 1984 | Three Mile Island |
| New England Power | 1971-1992 | Aa2 FMB downgraded to Aa3 in 1982, A1 in 1988 | Vt Yankee / Seabrook |

| Issuer | Period | Comment | Reactor |
|------------------------------------|-----------|--|--|
| Niagara Mohawk Power | 1968-1988 | Aaa FMB downgraded to A2 in 1968, A3 in 1982 and Baa1 in 1984 followed by upgrade to A3 in 1985 and downgrade to Baa1 in 1986, Baa2 in 1987 and upgrade to Baa1 in 1988 | Nine Mile Point / Fitzpatrick |
| Northern Indiana Public Service | 1973-1985 | Aa2 FMB downgraded to Aa3 in 1982, to A3 in 1983 followed by upgrade to A1 in 1984 and downgrade to A2 and then to Baa2 in 1985 | Bailly |
| Northern States Power (MN) | 1970-1976 | Aa2 FMB | Monticello / Prairie Island |
| NSTAR Electric | 1971-1990 | Aa2 FMB downgraded to A2 then to baa2 in 1974 followed by upgrade to A3 in 1983, A1 in 1984 then downgraded to Baa1 in 1988 | Maine Yankee / VT Yankee / Pilgram / Seabrook |
| Ohio Edison | 1975-1988 | Aa2 FMB downgraded to A2 in 1976, downgraded to Baa3 in 1981; upgraded to Baa2 in 1987 | Davis-Besse / Perry |
| Pacific Gas & Electric | 1983-1988 | A1 FMB | Diablo Canyon |
| Philadelphia Electric Company | 1973-1991 | Aaa FMB downgraded to aa2 in 1973 to A2 in 1974 to Baa2 in 1981 and Baa3 in 1983 followed by upgrade to Baa2 in 1991 | Peach Bottom / Limerick |
| PPL Electric Utilities | 1982-1986 | Aa2 FMB downgraded to Aa3 and again to A2 in 1982 | Susquehanna |
| Progress Energy Carolinas | 1970-1987 | Aa2 FMB downgraded to A2 in 1971 to Baa2 in 1975 followed by upgrade to A2 in 1978 | Robinson / Brunswick / Shearon Harris |
| Progress Energy Florida | 1975-1981 | A2 FMB | Crystal River |
| Public Service Co of Colorado | 1976-1990 | Aa2 FMB downgraded to A2 in 1980, upgraded to A1 in 1983, upgraded to Aa3 in 1985, downgraded to A1 in 1986 and to A2 in 1987 and A3 in 1990 | Ft St Vrain |
| Public Service Co of New Hampshire | 1980-1991 | Baa2 FMB downgraded to Baa3 then Ba1 in 1982, to B3 in 1984 followed by upgrade to B1 in 1986 then downgrade to Caa2 in 1987 followed by upgrade to Baa2 in 1991 exiting from bankruptcy | Seabrook |
| Public Service Electric & Gas | 1973-1987 | Aa2 FMB downgraded to Aa3 in 1982 | Peach Bottom / Salem / Hope Creek |
| Puget Sound Energy | 1978-1986 | Baa2 FMB upgraded to A3 in 1985 | Pebble Springs |
| Rochester Gas & Electric | 1969-1975 | Aa2 FMB downgraded to A2 in 1969 | Ginna |
| South Carolina Electric & Gas | 1979-1985 | A2 FMB upgraded to A1 in 1984 | Summer |
| Southern California Edison | 1979-1985 | Aa2 FMB | San Onofre |
| Texas Utilities | 1989-1995 | Baa2 FMB downgraded to Baa3 in 1990 | Comanche Peak |
| Toledo Edison | 1977-1988 | Baa2 FMB upgraded to Baa1 in 1982, downgraded to Baa2 in 1983, downgraded to Baa3 in 1984 | Davis-Besse / Perry |
| Union Electric | 1980-1988 | A2 FMB downgraded to Baa1 in 1980, to Baa2 in 1982, followed by upgrade to A3 in 1985 and A2 in 1988 | Callaway |
| Virginia Electric and Power | 1971-1982 | Aa2 FMB downgraded to A2 in 1974 | Surry / North Anna |
| Wisconsin Public Service | 1969-1975 | Aa2 FMB downgraded to A2 1969, upgraded to Aa2 in 1975 | Point Beach / Kewaunee |

Moody's Related Research

Special Comments:

- New Nuclear generating Capacity: Potential Credit Implications for U.S. Investor Owned Utilities, May 2008 (109152)
- EU Climate Change Strategy, May 2008 (108846)
- Decommissioning and Waste Costs for New Generation of Nuclear Power Structures, May 2008 (109086)
- Moody's Analytical Adjustments for Nuclear Energy Liabilities in EMEA, December 2007 (106604)
- Credit Challenges Ahead For Public Power: Difficult Decisions on New Generation Capacity, November 2007 (105997)
- New Nuclear Generation in the United States: Keeping Options Open vs Addressing An Inevitable Necessity, October 2007 (104977)
- Storm Clouds Gathering on the Horizon for the North American Electric Utility Sector, August 2007 (103941)
- Environmental Regulations Increase Capital Costs for Public Power Electric Utilities, June 2007 (103616)
- Regulation Of Greenhouse Gases: Substantial Credit Challenges Likely Ahead For U.S. Public Power Electric Utilities, June 2007 (103356)
- Regulatory Pressures Increase For U.S. Electric Utilities, March 2007 (102322)
- Moody's Comments on the Back to Basics Strategy for the North American Electric Utility Sector, November 2006 (100660)

To access this report, click on the entry above. Note that this reference is current as of the date of publication of this report and that more recent reports may be available. All research may not be available to all clients.

Report Number: 117883

| Author | Associate Analysts | Editor | Senior Production Associate |
|---------------|--------------------|-------------|-----------------------------|
| Jim Hempstead | Mitchell Moss | Jeff Pruzan | Judy Torre |
| | Jie (Julie) Jiang | | |

CREDIT RATINGS ARE MOODY'S INVESTORS SERVICE, INC.'S (MIS) CURRENT OPINIONS OF THE RELATIVE FUTURE CREDIT RISK OF ENTITIES, CREDIT COMMITMENTS, OR DEBT OR DEBT-LIKE SECURITIES. MIS DEFINES CREDIT RISK AS THE RISK THAT AN ENTITY MAY NOT MEET ITS CONTRACTUAL, FINANCIAL OBLIGATIONS AS THEY COME DUE AND ANY ESTIMATED FINANCIAL LOSS IN THE EVENT OF DEFAULT. CREDIT RATINGS DO NOT ADDRESS ANY OTHER RISK, INCLUDING BUT NOT LIMITED TO: LIQUIDITY RISK, MARKET VALUE RISK, OR PRICE VOLATILITY. CREDIT RATINGS ARE NOT STATEMENTS OF CURRENT OR HISTORICAL FACT. CREDIT RATINGS DO NOT CONSTITUTE INVESTMENT OR FINANCIAL ADVICE, AND CREDIT RATINGS ARE NOT RECOMMENDATIONS TO PURCHASE, SELL, OR HOLD PARTICULAR SECURITIES. CREDIT RATINGS DO NOT COMMENT ON THE SUITABILITY OF AN INVESTMENT FOR ANY PARTICULAR INVESTOR. MIS ISSUES ITS CREDIT RATINGS WITH THE EXPECTATION AND UNDERSTANDING THAT EACH INVESTOR WILL MAKE ITS OWN STUDY AND EVALUATION OF EACH SECURITY THAT IS UNDER CONSIDERATION FOR PURCHASE, HOLDING, OR SALE.

© Copyright 2009, Moody's Investors Service, Inc., and/or its licensors and affiliates (together, "MOODY'S"). All rights reserved. ALL INFORMATION CONTAINED HEREIN IS PROTECTED BY COPYRIGHT LAW AND NONE OF SUCH INFORMATION MAY BE COPIED OR OTHERWISE REPRODUCED, REPACKAGED, FURTHER TRANSMITTED, TRANSFERRED, DISSEMINATED, REDISTRIBUTED OR RESOLD, OR STORED FOR SUBSEQUENT USE FOR ANY SUCH PURPOSE, IN WHOLE OR IN PART, IN ANY FORM OR MANNER OR BY ANY MEANS WHATSOEVER, BY ANY PERSON WITHOUT MOODY'S PRIOR WRITTEN CONSENT. All information contained herein is obtained by MOODY'S from sources believed by it to be accurate and reliable. Because of the possibility of human or mechanical error as well as other factors, however, such information is provided "as is" without warranty of any kind and MOODY'S, in particular, makes no representation or warranty, express or implied, as to the accuracy, timeliness, completeness, merchantability or fitness for any particular purpose of any such information. Under no circumstances shall MOODY'S have any liability to any person or entity for (a) any loss or damage in whole or in part caused by, resulting from, or relating to, any error (negligent or otherwise) or other circumstance or contingency within or outside the control of MOODY'S or any of its directors, officers, employees or agents in connection with the procurement, collection, compilation, analysis, interpretation, communication, publication or delivery of any such information, or (b) any direct, indirect, special, consequential, compensatory or incidental damages whatsoever (including without limitation, lost profits), even if MOODY'S is advised in advance of the possibility of such damages, resulting from the use of or inability to use, any such information. The credit ratings and financial reporting analysis observations, if any, constituting part of the information contained herein are, and must be construed solely as, statements of opinion and not statements of fact or recommendations to purchase, sell or hold any securities. NO WARRANTY, EXPRESS OR IMPLIED, AS TO THE ACCURACY, TIMELINESS, COMPLETENESS, MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE OF ANY SUCH RATING OR OTHER OPINION OR INFORMATION IS GIVEN OR MADE BY MOODY'S IN ANY FORM OR MANNER WHATSOEVER. Each rating or other opinion must be weighed solely as one factor in any investment decision made by or on behalf of any user of the information contained herein, and each such user must accordingly make its own study and evaluation of each security and of each issuer and guarantor of, and each provider of credit support for, each security that it may consider purchasing, holding or selling. MOODY'S hereby discloses that most issuers of debt securities (including corporate and municipal bonds, debentures, notes and commercial paper) and preferred stock rated by MOODY'S have, prior to assignment of any rating, agreed to pay to MOODY'S for appraisal and rating services rendered by it fees ranging from \$1,500 to approximately \$2,400,000. Moody's Corporation (MCO) and its wholly-owned credit rating agency subsidiary, Moody's Investors Service (MIS), also maintain policies and procedures to address the independence of MIS's ratings and rating processes. Information regarding certain affiliations that may exist between directors of MCO and rated entities, and between entities who hold ratings from MIS and have also publicly reported to the SEC an ownership interest in MCO of more than 5%, is posted annually on Moody's website at www.moodys.com under the heading "Shareholder Relations — Corporate Governance – and Shareholder Affiliation Policy.



Moody's Investors Service