

1 **Q. Please advise if non-regulated expenses are used for purposes of calculating interest**  
2 **coverage ratios and, if so, provide a sample calculation.**

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4 A. All expenses, whether regulated or non-regulated, are included in the calculation of  
5 interest coverage ratios. When calculating interest coverage, the pre-tax income to be  
6 included in the calculation is net of all expenses.

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8 The Company's calculation of interest coverage is based on the CBRS methodology as  
9 follows:

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11 
$$\text{Interest Coverage} = (\text{net income} + \text{income taxes} + \text{interest costs net of interest}$$
  
12 
$$\text{capitalized}) / \text{gross interest costs.}$$

13  
14 The interest coverage ratio is an industry standard measure of the creditworthiness and  
15 financial strength of a company. It is one of the primary financial ratios used by the bond  
16 rating agencies and markets to assess the financial strength of a company that is issuing  
17 bonds.

18  
19 The removal of non-regulated expenses would overstate pre-tax income, thus inflating the  
20 result of the interest coverage calculation. This would not provide an accurate picture of  
21 the Company's financial position and would likely be rejected as a suitable method of  
22 calculation by the financial markets.

23  
24 Exhibit BVP-7, page 9, outlines the calculation of interest coverage. Non-regulated  
25 expenses have been deducted from earnings to common shares which is shown on line 2  
26 of page 9. For forecast 2002 the interest coverage is 2.54 times.