

Requests for Information

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.**
3

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.
7

8 The Company's calculation of interest coverage is based on the CBRS methodology as
9 follows:
10

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. < > Earnings to
25 common shares < > on line 2 of page 9 reflect the deduction of non-regulated expenses as
26 per the Company's income statement found on page 1 of Exhibit BVP-7. For < > 2002
27 the interest coverage is 2.61 times.