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Q. Reference: Dr. Cleary's Evidence, Page 29, Table 11

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Please provide the same information regarding the rating methodology used by Moody's Investors Service to rate regulated utilities. Is Moody's rating based entirely on credit metrics, or does Moody's also consider other factors?

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A. Dr. Cleary is well aware that credit metrics are only a part of what debt rating agencies consider in determining their ratings. For example, Dr. Cleary notes the following rating grid which is provided on page 6 of The Moody's 2013 Methodology Report provided in the response to CA-NP-028 from the 2016 NP Rate proceedings, which summarizes the factors that Moody's consider, and the weightings they attach to the various factors:

11 12

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Factor / Sub-Factor Weighting - Regulated Utilities

Broad Rating Broad Rating Factors Factor Weighting

Regulatory 25%

Framework

Ability to Recover 25%

Costs and Earn

Returns

Diversification 10%

Financial Strength, 40%

Key Financial Metrics

Pages 6-31 of the Moody's Methodology report provide details in terms of how they assess utilities according to the factors in the grid provided above.