

1 **Q. Page 36: Dr. Cleary states that Newfoundland Power's credit metrics "would**
 2 **remain solid" if its allowed equity ratio was reduced to 40% and its allowed return**
 3 **on equity was reduced to 7.5%. What, in Dr. Cleary's opinion, would be the change**
 4 **in the allowed return required at 40% common equity to cause Newfoundland**
 5 **Power's credit metrics to cause concern?**

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7 A. Dr. Cleary's examination of credit metrics under a 40% equity ratio did not
 8 examine the impact on metrics with allowed ROEs below 7.5%. However, as indicated in
 9 the question above, at 7.5% Dr. Cleary concluded the metrics would remain solid.

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11 In response to this question, Dr. Cleary has further calculated that with an ER of 40%,
 12 and an ROE of 7.0%, NP's metrics would remain within the Moody's and DBRS ranges
 13 to maintain their existing ratings, as shown below:

2016 Metrics	ROE	
	7.0%	NP
Moody's Metrics		
(CFO pre-WC + Interest)/Interest	3.45	Baa(low)
CFO pre-WC/Debt	14.58%	Baa(mid)
(CFO pre-WC - Dividends) /Debt	11.85%	Baa(mid)
Debt/Capitalization	59.00%	Baa(low)
DBRS Metrics		
Cash flow to debt	14.58%	A(mid)
Debt to Capital	59.24%	A(mid)
EBIT to Interest	2.13	A(low)
2017 Metrics	ROE	
	7.00%	

Moody's Metrics

(CFO pre-WC + Interest)/Interest	3.43	Baa(low)
CFO pre-WC/Debt	14.44%	Baa(mid)
(CFO pre-WC - Dividends) /Debt	12.79%	Baa(mid)
Debt/Capitalization	59.04%	Baa(low)

DBRS Metrics

Cash flow to debt	14.44%	A(mid)
Debt to Capital	59.28%	A(mid)
EBIT to Interest	2.14	A(low)

1 Therefore, Dr. Cleary suggests that for ROEs as low as 7% the metrics would deteriorate
2 but remain acceptable within current ratings' ranges. Below 7%, there could be concerns
3 regarding how the rating agencies would view NP's metrics; although this is certainly not
4 the only criteria considered by the rating agencies. The other concern is regarding the
5 interest coverage ratio of 2 that NP must maintain in order to issue bonds. At a 7% ROE,
6 this ratio would lie above 2.1, so it would still have a buffer; albeit a smaller one.