MOODY'S INVESTORS SERVICE

Rating Action: Moody's places ratings of most US regulated utilities on review for upgrade

08 Nov 2013

Approximately \$400 billion of debt affected

New York, November 08, 2013 -- Moody's Investors Service placed the ratings of most regulated utilities and utility holding companies in the United States on review for upgrade, affecting approximately \$400 billion of debt. These companies have been placed on review because Moody's has adopted a generally more favorable view of the relative credit supportiveness of the US regulatory environment, as detailed in our September 23, 2013 Request for Comment: "Proposed Refinements to the Regulated Utilities Rating Methodology and our Evolving View of US Utility Regulation."

RATINGS RATIONALE

"Our placement of these issuers on review considers improving regulatory trends in the US, including better cost recovery provisions, reduced regulatory lag, and generally fair and open relationships between utilities and regulators, " said Moody's Managing Director Larry Hess. We believe that many US regulatory jurisdictions have become more credit supportive of utilities over time and that our assessment of the regulatory environment that has been incorporated into ratings may now be overly conservative.

The US utility sector's low number of defaults, high recovery levels, and generally strong financial metrics from a global perspective provide additional corroboration for our view that ratings should generally be higher.

We expect that most upgrades will be limited to one notch, and that the reviews of the affected companies will be completed within approximately 90 days. Although we anticipate that most of the utilities placed under review will be upgraded, there may be selected instances where ratings will not be upgraded following the completion of our review.

We note that several regulated utilities and utility holding companies were not placed on review due to issuer specific circumstances that would preclude an upgrade at this time. These exclusions include utilities that are engaged in substantial construction programs for new generation or other large capital projects, currently have a Negative Outlook or are under potential downward rating pressure, are characterized by material concentration or event risk, face market or regulatory risks specific to their particular jurisdictions, or are part of a corporate family that has significant non-utility operations.

The following companies were placed on review for upgrade:

AEP Texas Central Company

AEP Texas North Company

AGL Capital Corporation

AGL Resources Inc.

Atlanta Gas Light Company

Alabama Power Company

ALLETE, Inc.

Alliant Energy Corporation

Ameren Corporation

Ameren Illinois Company

American Electric Power Company, Inc. American Transmission Company LLC Appalachian Power Company Arizona Public Service Company Atlanta Gas Light Company Atlantic City Electric Company Atmos Energy Corporation Avista Corp. Baltimore Gas and Electric Company Berkshire Gas Company Black Hills Corporation Black Hills Power, Inc. CenterPoint Energy Houston Electric, LLC CenterPoint Energy, Inc. Central Hudson Gas & Electric Corporation **Central Maine Power Company Cleco** Corporation Cleco Power LLC CMS Energy Corporation Commonwealth Edison Company Connecticut Light and Power Company **Connecticut Natural Gas Corporation** Consolidated Edison Company of New York, Inc. Consolidated Edison, Inc. Consumers Energy Company Delmarva Power & Light Company **Dominion Resources Dominion Gas Holdings** DTE Electric Company DTE Energy Company DTE Gas Company Duke Energy Carolinas, LLC Duke Energy Corp. Duke Energy Florida, Inc.

Duke Energy Indiana, Inc. Duke Energy Kentucky, Inc. Duke Energy Progress, Inc. Duquesne Light Company Duquesne Light Holdings, Inc. **Edison International** Elm Road Generating Station Supercritical El Paso Electric Company Empire District Electric Company (The) Entergy Arkansas, Inc. Entergy Gulf States Louisiana, LLC Entergy Louisiana, LLC Entergy Mississippi, Inc. Entergy Texas, Inc. Florida Power & Light Company Great Plains Energy Incorporated **Gulf Power Company** Hawaiian Electric Company Hawaiian Electric Industries, Inc. IDACORP, Inc. Idaho Power Company Indiana Gas Company, Inc. Indiana Michigan Power Company Indianapolis Power & Light Company Integrys Energy Group, Inc. International Transmission Company IPALCO Enterprises, Inc. **ITC Great Plains LLC** ITC Holdings Corp. ITC Midwest LLC Kansas City Power & Light Company Kansas City Power & Light Greater MO Oper Kentucky Power Company

Kentucky Utilities Co. Laclede Gas Company Laclede Group, Inc. (The) LG&E and KU Energy LLC Louisville Gas & Electric Madison Gas and Electric Company Michigan Electric Transmission Company, LLC MidAmerican Energy Holdings Company MidAmerican Energy Company Nevada Power Company New Jersey Natural Gas Company New York State Electric and Gas Corporation NiSource Capital Markets, Inc. NiSource Finance Corp. NiSource Inc. North Shore Gas Company Northeast Utilities Northern Illinois Gas Company Northern Indiana Public Service Company Northern States Power Company (Minnesota) Northern States Power Company (Wisconsin) NorthWestern Corporation **NSTAR Electric Company** NV Energy Inc. OGE Energy Corp. Oklahoma Gas & Electric Company Orange and Rockland Utilities, Inc. Otter Tail Corporation Otter Tail Power Company PacifiCorp PECO Energy Company Peoples Gas Light and Coke Company Pepco Holdings, Inc. Piedmont Natural Gas Company, Inc.

Pinnacle West Capital Corporation **Pivotal Utility Holdings PNG Companies LLC** PNM Resources, Inc. Portland General Electric Company Potomac Electric Power Company **PPL** Corporation **PPL Electric Utilities Corporation** Progress Energy, Inc. Public Service Company of Colorado Public Service Company of New Hampshire Public Service Company of New Mexico Public Service Company of Oklahoma Public Service Electric and Gas Company Puget Energy, Inc. Puget Sound Energy, Inc. **Questar Corporation** Questar Gas Company Rochester Gas & Electric Corporation San Diego Gas & Electric Company SEMCO Energy, Inc. Sierra Pacific Power Company SourceGas LLC South Jersey Gas Company Southern California Edison Company Southern California Gas Company Southern Connecticut Gas Company Southern Indiana Gas & Electric Company Southwest Gas Corporation Southwestern Electric Power Company Southwestern Public Service Company Superior Water, Light and Power Company Tampa Electric Company

TECO Energy, Inc.

Texas-New Mexico Power Company

Tucson Electric Power Company

UGI Utilities, Inc.

UIL Holdings Corporation

Union Electric Company

United Illuminating Company

UNS Electric, Inc.

UNS Energy Corporation

UNS Gas, Inc.

Vectren Utility Holdings, Inc.

Virginia Electric and Power Company

Washington Gas Light Company

Westar Energy, Inc.

Western Massachusetts Electric Company

WGL Holdings, Inc.

Wisconsin Electric Power Company

Wisconsin Energy Corporation

Wisconsin Gas LLC

Wisconsin Power and Light Company

Wisconsin Public Service Corporation

Xcel Energy Inc.

Yankee Gas Services Company

The principal methodology used in these ratings was Regulated Electric and Gas Utilities published in August 2009. Please see the Credit Policy page on www.moodys.com for a copy of this methodology.

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