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By email

To Company Secretary
Sutton and East Surrey Water Plc
66-74 London Rd,
Redhill
Surrey
RH1 1LG

12 August 2020

Water and Sewerage Appointees – Definition of “Issuer Credit Rating”

Dear Company Secretary,

On 14 July 2020, we published a formal [decision document](#) setting out the reasons for the licence modifications we have made as a result of the recent section 13 consultation on the ring-fencing provisions in companies’ licences. These modifications were made on 10 July 2020 and came into effect on 13 July 2020.

Under the updated licence wording, an “Issuer Credit Rating” is defined as:

- (a) an issuer credit rating assigned to the Appointee or any Associated Company which issues corporate debt on its behalf by a Credit Rating Agency;
- (b) a Corporate Family Rating assigned by a Credit Rating Agency to a corporate group of which the Appointee is a member and which has been approved for this purpose by Ofwat; or
- (c) a rating assigned by a Credit Rating Agency to the Appointee or any Associated Company, for so long as Ofwat has determined in writing that this rating sufficiently reflects the creditworthiness of the Appointee.

This letter confirms which of the company’s ratings fall under the licence definition and sets out the reason for our decision to monitor ratings under limbs (b) and (c).

In an email dated 2 August 2019 you confirmed that Sutton and East Surrey Water Plc holds the following credit ratings from Moody’s and Standard and Poor’s:

AGENCY	TYPE
Moody's	Class A debt rating
Standard & Poor's	Class A group rating

Credit ratings that fall under limb (a)

There are currently no ratings held by Sutton and East Surrey Water Plc that meet the criteria set under limb (a).

Credit ratings assessed under limb (b)

There are currently no ratings held by Sutton and East Surrey Water Plc that meet the criteria set under limb (b).

Credit ratings assessed under limb (c)

We have considered whether any of the company's ratings meet the requirements of limb (c). We have determined the following credit rating to be sufficiently reflective of the entity's creditworthiness and therefore meets the definition as per limb (c):

- Moody's Class A debt rating – provided that Sutton and East Surrey Water Plc (or any Associated Company) does not obtain an alternative rating from Moody's that falls under limb (a) or limb (b) of the licence definition and provided there is no Class B sub-ordinated debt.

We intend to determine that the following Class A issue credit rating does not fit the licence definition for Issuer Credit Ratings, as it is a group rating based on the overall Group (SOGWUK) level and includes an assessment of non-regulated businesses within the group. For this reason, we have determined that the following rating does not provide an equivalent level of protection for customers as other ratings and therefore does not meet the definition under limb (c):

- S&P Class A group rating.

Other clarifications

For the avoidance of doubt, Class B / subordinated debt ratings are not used as regulatory markers for cash lock-up or to assess compliance with the Appointee's obligation that it must ensure it maintains an appropriate investment grade credit rating at all times.

Please notify us as soon as possible if any additional credit ratings to those listed above are obtained, or if the withdrawal of any of the above credit ratings is requested.

Best regards,

Aileen Armstrong
Senior Director