

New Nuclear – The Economics Say No

 Equity

UK Green Lights New Nuclear – Or Does It?

- **Green lighting new nuclear?** — The UK government today announced a fast-track planning process for new nuclear power stations. 10 sites have been approved for possible development. The government is presenting today's announcement as providing the green light for a major new nuclear programme, which it says is needed to meet climate change and security of supply targets.
- **But no financial support has been offered** — The government has not announced any direct financial support for new nuclear. The government still seems to expect the private sector to take an unacceptable level of risk, in our view.
- **The five big risks** — Nuclear power station developers face five big risks: Planning, Construction, Power Price, Operational, and Decommissioning. The government today has sought to limit the Planning risk. While important for encouraging developers to bring forward projects, this is the least important risk financially.
- **The three Corporate Killers** — Three of the risks faced by developers — Construction, Power Price, and Operational — are so large and variable that individually they could each bring even the largest utility company to its knees financially. This makes new nuclear a unique investment proposition for utility companies.
- **No where else in the world** — Government policy remains that the private sector takes full exposure to the three main risks; Construction, Power Price and Operational. Nowhere in the world have nuclear power stations been built on this basis.
- **Nor will they be built in the UK** — We see little if any prospect that new nuclear stations will be built in the UK by the private sector unless developers can lay off substantial elements of the three major risks. Financing guarantees, minimum power prices, and / or government-backed power off-take agreements may all be needed if stations are to be built.

Peter Atherton

 +44-20-7986-3912
 peter.atherton@citi.com

Andrew M Simms

 +44-20-7986-4371
 andrew.simms@citi.com

Sofia Savvantidou

 +44-20-7986-3932
 sofia.savvantidou@citi.com

Stephen B Hunt

 +44-20-7986-6974
 stephen.hunt@citi.com

See Appendix A-1 for Analyst Certification and important disclosures.

New Nuclear Development – Corporate Risks

The UK government today launched a fast-track planning process for a new generation of nuclear power plants in the UK. The government has selected 10 sites that will be taken forward by the new Infrastructure Planning Commission for approval. Planning inquiries will still be required but will deal with local issues only.

The UK government has presented this today as effectively “green lighting” the build of new nuclear stations. However, this is in fact far from the case.

The Five Risks

There are five substantial areas of risk faced by developers of new nuclear power stations. Three of those risk areas are so big and significant that if they go wrong, the developer (even the biggest utilities) could be financially damaged beyond repair. These risks can be classed as Corporate Killers. The government today announced measures to limit Planning risk, which while important in encouraging developers to bring forward projects, is actually the least significant risk financially. The government is still asking the utility companies to take on the three major risks — Construction, Power Price, and Operational. Indeed, at no time, anywhere in the world, has a utility built a new nuclear power station and taken the full Construction, Power Price, and Operational Risk.

The five risk areas are:

Planning is the least risky element from a financial perspective

- 1. Planning:** Nuclear power remains controversial and opposition to new developments often results in extended planning procedures. In a lot of countries, planning can take five years or more. The UK government’s action today is designed to limit this time frame, reducing the risk faced by developers. However, while an expedited planning process is essential in encouraging developers to bring forward projects, it is in fact the least risky element in the development process from a financial perspective. Developers will have spent some money acquiring a site (which could probably be used to build a conventional power station if planning consent for a new nuclear plant is refused) and will commit time and a few £10m’s to the planning process. While annoying for the developers if this turns out to be wasted time and money, in no way would a failed planning application threaten the financial integrity of a utility company.

We see very little prospect of construction costs falling and every likelihood of them rising further.

- 2. Construction:** Below we give the latest data on the current and future costs of building a new nuclear power station. The latest evidence suggests a cost range of €2,500/kW to €3,500/kW. For a 1,600MW unit, that means a construction cost of up to €5.6bn. We see very little prospect of these costs falling and every likelihood of them rising further. The cost of the TVO plant in Finland has increased from €3.0bn to €5.3bn since construction started. It has also proven to be very difficult to predict how long a new plant will take to build. The TVO plant is also running three years late. Cost overruns and time slippages of even a fraction seen by TVO would be more than enough to destroy the equity value (and more) of a developer’s investment unless these costs can be passed through somehow. Given the scale of these costs, a construction programme that goes badly wrong could seriously damage the finances of even the largest utility companies.

We calculate that a new nuclear station will require €65/MWh (£58.5/MWh) in real terms year in year out to hit its breakeven hurdle rate.

- 3. Power Price:** Nuclear power stations have very high fixed costs and relatively low variable costs. Their cash flows and profitability are therefore particularly sensitive to the price that they sell their power. As we show later, even at the low end of the build cost estimates, we calculate that a new nuclear station will require €65/MWh (£58.5/MWh) in real terms year in/year out to hit its breakeven hurdle rate. As we show in Figure 5, the UK has only seen prices at that level on a sustained basis for 20 months of the last 115 months. It was a sudden drop in power prices that drove British Energy to the brink of bankruptcy in 2003. No nuclear power station has ever been built to our knowledge where the developer takes the power price risk.
- 4. Operational:** Because of their high fixed cost base, nuclear stations are also very vulnerable to shortfalls in output due to operational unreliability. A six-month breakdown can cost £100m's in direct costs and lost output, particularly if the output has been pre-sold. This risk is too great for a single project to bear, in our view, and at the very least needs to be spread across a portfolio of assets.
- 5. Decommissioning / Waste:** Nuclear plant operators set aside money in order to pay for decommissioning and the disposal of waste. Estimates of these costs can jump around by many £bn's depending on what discount rates are used, etc. The UK government is proposing adopting the "pay as you go" approach used successfully in the USA amongst other countries. Basically a tax will be paid on each MWh produced (probably as little as £1/MWh). This would effectively limit the risk faced by the developers.

The returns for new nuclear development will need to be underpinned by the government and the risks shared with the taxpayer / consumer.

In our view, it is extremely unlikely that private sector developers will be willing or able to take on the Construction, Power Price, and Operational risks of new nuclear stations. The returns would need to be underpinned by the government and the risks shared with the taxpayer / consumer. Minimum power prices (perhaps through capacity payments), support for financing, and government-backed off-take agreements may all be needed to make new nuclear viable.

Update on Cost Estimates

Construction costs are very difficult to quantify, but are a key factor in new nuclear affordability economics. Third-generation plants are meant to provide better performance with lower initial capital costs. However, as we noted in our previous note on European Nuclear Generation (see <https://www.citigroupgeo.com/pdf/SEU20085.pdf>), we believe that construction delays and cost overruns could sharply increase the quoted capital costs for new nuclear and lead to value destruction and lower returns to equity investors.

Evidence to date suggests time delays in new nuclear construction can be significant

Both Westinghouse and Areva claim to be able to construct a new third-generation plant (AP-1000 and EPR, respectively) in 3 years from first pouring of concrete. However, evidence to date suggests this is not necessarily the case, as Olkiluoto and Flamanville projects have both suffered delays, while the first AP-1000 unit under construction, in SanMen China, is running significantly over its \$1,000/KW construction cost target and is expected to be over \$3,500/KW target on current estimates.

Georgia Power stated in mid 2008 that two 1100MW reactors would cost up to \$14 billion, depending on financing terms. This gives significantly high cost assumptions of \$6,360 per kilowatt.

In November 2008, Tennessee Valley Authority updated its estimates for Bellefonte units 3 & 4 relating to two AP1000 reactors of 2234MW combined. It said that overnight capital cost estimates ranged from \$2,516 to \$4,649/kW for a combined construction cost of \$5.6 to \$10.4 billion.

Towards the end of 2008, at its investor day, EdF increased its cost assumptions for the Flamanville 3 EPR, raising them to €4 billion/\$5.6 billion or €2,434/kW or \$3,400/kW in real money terms. These costs were confirmed in mid 2009, when EdF had already spent nearly €2billion.

Another estimate from Nuclear Innovation North America, in June 2009, said that the cost of two 1350 MW GE ABWR units at the South Texas Project near Houston would be about \$10 billion, including financing costs. This would be a merchant plant, not a regulated one, operating on cost plus basis with the first unit expected on line in 2016. This equates to \$3,700/KW.

Construction delays and planning problems have led to a 77% increase in construction costs at the Olkiluoto site.

The Finnish EPR at Olkiluoto has been plagued by many delays during construction and is currently 3 years behind schedule, having originally targeted commissioning in 2009. The original cost estimate for Olkiluoto was €3bn. However, due to delays, planning problems (construction started in 2005), and issues with materials, Areva's latest estimate (August 2009) is that costs have risen by €2.3bn and could increase further depending on the outcome of negotiations between the owner, TVO, and Areva on the timeline for completion. Therefore at a running total of €5.3bn, costs stand at €3,300/kw (\$4,785/KW) and although this is the first EPR project, and teething troubles ought to be expected, it is still indicative of the risks that we think equity investors should be concerned about.

Also, in May 2009, MIT published an update of its 2003 study into construction costs of large-scale engineering projects. The report stated that "since 2003 construction costs for all types of large-scale engineered projects have escalated dramatically." In addition, according to the report, the estimated cost of constructing a nuclear power plant has increased at a rate of 15% per year heading into the current economic downturn. This is based both on the cost of actual builds in Japan and Korea and on the projected cost of new plants planned for in the United States. The overnight capital cost was given as \$4,000/kW, in 2007 money.

In a purely merchant market (such as the UK) where wholesale power prices need to cover construction costs over the life of the project, there is no active way for a developer to recover cost overruns.

This vast range of figures for new nuclear construction costs suggests that there is a high degree of uncertainty and therefore risk in this part of the project. In a regulated framework this is less of an issue for economic viability (but still a political and social issue) as construction costs can be recovered through higher regulated tariffs. However, in a purely merchant market (such as the UK) where wholesale power prices need to cover construction costs over the life of the project, there is no active way for a developer to recover cost overruns. It is this scenario that we believe threatens value and returns to equity investors.

As we have stated previously, there is a possibility that governments intervene in the wholesale markets to ensure power prices remain sufficient to reward new investment, but at this stage it is unclear whether this would be the case and how such intervention would work.

The Energy Bill recently passed by the US Congress recognises such risks and provides production credits of 1.8 cents per KWh for the first 3 years of operation, equivalent to the subsidy provided to the wind generation segment.

Debt & Equity Financing Environment Improving

The recent stabilisation in economic data and recovery in the equity and debt markets has had a positive effect on the financing environment, as CDS have contracted and appetite for corporate debt has increased, bringing yields down.

Figure 1 shows the IBOXX Utilities Bond price index since 2004. Although still some way below the peak in late 2005, the recovery over the past year shows that credit costs for utilities should have eased, although we would point out that the high capital risks associated with new nuclear construction may lead to higher cost of debt than other conventional power plant projects.

Figure 1. IBOXX Utilities Bond Price Index



Source: DataStream

The risks are significantly higher for equity rather than debt investors, with leverage likely in these projects at least 50:50%.

Due to the uncertainties on timing and cost, we believe nuclear projects should have a higher ERP than the overall market.

Figure 2 shows the trend in overall market equity risk premium (ERP) over the past 5 years. Although off its highs, the ERP is still high compared to 2006-7 and contributes significantly to higher WACC in new projects. Due to the uncertainties on timing and cost, we believe nuclear projects should have a higher ERP than the overall market.

Figure 2. Equity Risk Premium 2004-2009 (%)



Source: Citi Investment Research and Analysis

On the back of our observations on the trading levels of the debt and equity markets and our assessment of the risks involved, we believe a 4.5% post-tax cost of debt and a 12.5% cost of equity on a 50:50% gearing are appropriate, which provide an 8.5% post-tax WACC for the project.

Moody's has issued a statement saying that it is considering taking a more cautious view toward issuers that are actively pursuing new nuclear generation.

Moody's has recently issued a statement saying that it is considering taking a more cautious view toward issuers that are actively pursuing new nuclear generation, as history gives reason to be concerned about possible balance sheet challenges and the substantial execution risk. "In order to defend existing ratings, or to limit negative rating actions, we will look for investor-owned utilities to create strategic partnerships, to share costs and risks, and to increase reliance on equity as a component to financing plans. We would also expect them to moderate their dividend policies to retain cash flows".

Inherent risk in new nuclear development causes credit investors to seek increased funding from the equity side

We believe new nuclear is a classic example of divergent interests between credit and equity investors that also create a vicious circle. The inherent risk causes credit investors to seek increased funding from the equity side. However, with cost of capital the major determinant of break-even prices, an increased equity injection increases the power price required, therefore increasing the risk of failure, hence increasing the credit market's aversion for such projects. We expect utilities to try to seek support and assurances from involved governments, however we continue to argue that the risk/reward without such explicit support is skewed against equity investors.

Load Factors Not To Be Taken For Granted

A key aspect of the economics of new nuclear plants is the assumed and achieved load factors that a plant is expected to reach. EDF is targeting an availability factor of 85% for its existing operational nuclear plants.

In Figure 3, we show EDF's reported operational factors and our estimates to 2012E. We note that EDF in the past 5 years has consistently reported load factors below 80%.

Figure 3. EDF – Load Factors and Availability Factors, Reported (2004-8) and Estimated (2009E-2012E)

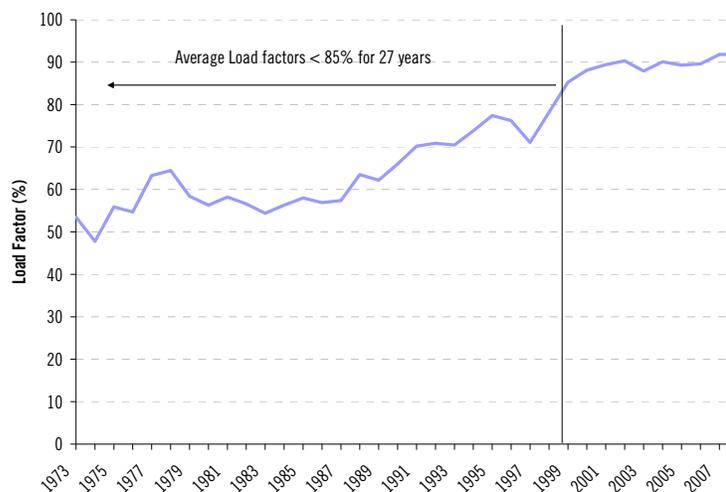
	2004	2005	2006	2007	2008	2009E	2010E	2011E	2012E
Load factor (%)	77.2%	77.6%	77.4%	75.6%	75.5%	74.6%	78.0%	80.8%	81.6%
Availability (%)	82.8%	83.2%	83.6%	80.2%	79.2%	78.5%	83.0%	85.0%	85.0%

Source: Company Reports and CIRA Estimates

US utilities recognised that the plants were not economically viable without increasing the load factors and therefore undertook programs to boost utilisation

In the US in the 1970s and 1980s, when previous generations of nuclear plants were built, load factors were consistently below 70%. This perhaps reflects the inexperience of dealing with new nuclear reactor technology at that time, a factor that could well impact new third-generation plants in future years. Figure 4 shows the load factors of the US reactors between 1973 and 2008 and the increasing trend towards 90%. The main reason for this is that the US utilities recognised that the plants were not economically viable without increasing the load factors and therefore undertook programs to boost utilisation. However, a plant built in 1990, with a useful life of 40 years, would have been operating at below 80% load factor for the first 8 years of its life, a scenario that threatens the economic viability of new nuclear plants.

Figure 4. US Load Factors (%) – 1973-2008



Source: EIA

With the recent experiences of the UK nuclear plants as well, we do not believe equity investors should take design specifications as 100%-proof, at least from year 1.

Bottlenecks in Construction a Rising Obstacle

India and China are both targeting huge increases in nuclear generation over the next couple of decades.

On 7th September, Japan Steel Works, the sole maker of certain atomic reactor parts, more than doubled its forecasts for China's nuclear plant construction. It now sees scope for China to have built 22 reactors by end 2010 and 132 reactors thereafter, compared to an original estimate from last year for a total of 60 reactors. We remind readers that the Chinese government has given approval for 25.4GW of new nuclear capacity, with 9.1GW currently on operation. Japan Steel Works is in the process of expanding its capacity from 5.5 units equivalent p.a. to 12 by March 2012 at a cost of ~\$900m. This expected growth in China is very important for the ambitions of utilities on new nuclear in Europe. China's central planning of the projects, government support and rising GDP are likely to make this a priority market for constructors.

Later in September, the Indian Prime Minister, Manmohan Singh, predicted that India could produce 470 gigawatts of nuclear power, making India the largest nuclear energy producer in the world. India's 17 reactors currently produce 3.8 gigawatts of power and while the contribution of nuclear energy is expected to rise from just 3 percent to 6 percent of India's total needs over the next decade, it is expected to increase to between a third and a half of the country's energy needs by 2050, according to the new forecast announced by Singh. The ability to execute this will be highly dependent on the availability of nuclear developers, materials and experienced labour, and could create bottlenecks in construction, pushing back development timelines by several years, a factor that would severely hinder the prospect of a new nuclear project providing adequate returns to equity holders.

With significant bottlenecks, not least because of Japan Steel Works' paramount position in the parts chain, European plants could well fall behind. We continue to argue that unless we see strong government commitment on new nuclear projects in Europe, they are unlikely to come on line according to existing timetables.

Licensing

The new nuclear program in the UK is likely to be delayed as the UK Nuclear Installations Inspectorate (NII) published a statement (April 2009) saying it has serious reservations about the safety of Areva's EPR reactor design. The NII has written to EDF and Areva highlighting concerns around the control and instrumentation systems in the design. The NII said the EPR technology was compromised due to interconnections between systems that should be independent.

Neither the UK nor the US have yet approved any designs and although it will be a lengthy process anyway, amendments and additional configurations for each country's demands could be highly problematic.

Neither the UK nor the US have yet approved any designs and although it will be a lengthy process anyway, amendments and additional configurations for each country's demands could be highly problematic. This also remains an issue for other regions where each individual government may request additional design modifications to grant the licence, something that would greatly add to cost and remove one of the supposed construction efficiency advantages of having a standardised design across territories. Additionally, even with government intervention on power pricing, we would be surprised if governments allow a return to be made not only on the theoretical investment but also on the budget and time overruns, effectively burdening the consumer with the cost of any inefficiencies in the planning system or actual execution by the utilities

The NII called on the companies to submit an initial response by May 22, and then a full answer by the end of August 2009, although the HSE has not yet published a statement saying it has received the necessary responses. The recent HSE update report states that the target for completion of design assessment is 2Q 2011, in line with previous estimates. We do see scope, though, that due to licensing issues and regionally-customised design specifications, new nuclear power plants could take longer to be built than the timeframe planned and therefore cost more.

Grid and Back-up Capacity Costs

The UK has already provided some cost budgeting work, with National Grid estimating that should all existing nuclear power plants be replaced an extra £1.4b of spend would be required to reinforce the transmission network.

Taking the UK as an example of commitment to new nuclear generation, we look at the ability of the grid system to cope with such increases in generation from single sources. With the potential for 4-8 new plants to be built in the UK over the next 20 years, the current maximum grid connection of 1320MW and in the absence of simultaneous switch off of existing nuclear facilities, significant grid upgrades may be required to avoid overload in the event of the Areva EPR becoming the chosen standard for new nuclear build in the UK. The only reactor in the UK currently in operation with a power rating over 1000MW is Sizewell B with a power rating of c. 1250MW. The Areva EPR and other advanced PWRs have power ratings in the region of 1000-1700MW. Similar issues would be faced in other countries and anecdotal evidence has suggested that the preference of the smaller reactors over the EPR in China related partly to the reduced impact on the network.

The UK has already provided some cost budgeting work, with National Grid estimating that, should all existing nuclear power plants be replaced, an extra £1.4bn of spend would be required to reinforce the transmission network. Additional spinning reserve costs would have to be considered ,with PB Power quoted as saying that for every new EPR build in the UK, an additional 260MW of spinning reserve would be required at £1.3-2.1/MWh.

This also raises issues in the areas of planning for new substations, overhead power lines, site connection and gaining public approval for this infrastructure. In some cases, public opposition is significantly higher in regards to high-voltage power lines than for the nuclear plants that generate the electricity.

Dale Klein, chairman of the US NRC, has stated previously that necessary grid extensions and upgrades could lead to further delays of nuclear projects and indicated that he was surprised to learn that "it may take as long to site, permit, and build a transmission line for a new plant as to site, license, and build the plant itself."

Land Costs

The auction for three UK sites for possible development for new nuclear is reported to have netted the UK government £387m. The RWE / E.ON consortium acquired two sites, Wylfa in North Wales and Oldbury in South West England. Edf acquired the third site, Bradwell in England. No breakdown of the prices paid for the three sites has been released yet, so it is unclear whether or not the payments will be made immediately or at least partly deferred to when construction begins. The RWE / E.ON consortium confirmed that it intends to build up to 6,000MW of new nuclear in the UK.

What it all means for shareholders

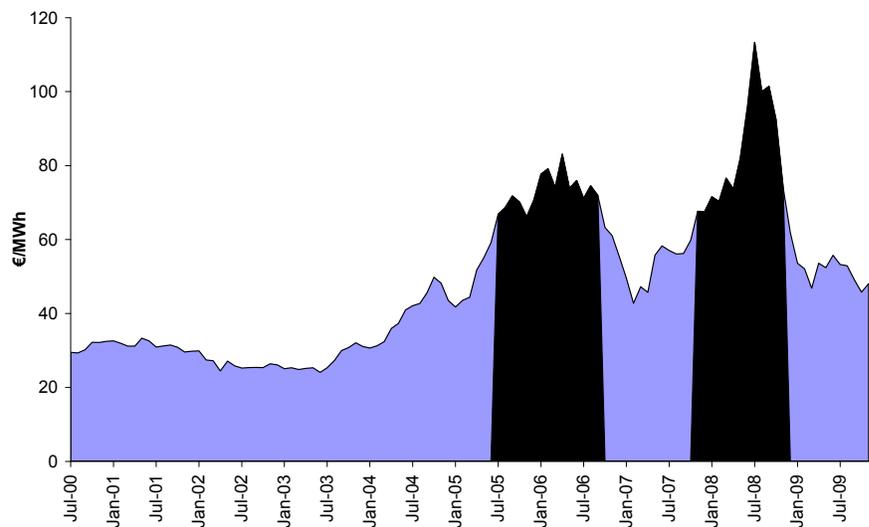
Scenario 1: Plant built on time and on budget

On the assumption that the total cost, inclusive of construction, financing, development and land purchase, of a 1600MW nuclear plant will be at €5bn, i.e. €3,125/KW, and that within 5 years the nuclear plants reach their maximum availability potential, we estimate that power prices need to be at €65/MWh for investors to earn a reasonable positive return (100bps over cost of capital).

Scenario 2: Plant built with delays

On the assumption of a 20% cost overrun (i.e. €3,580/KW) and 2-year time delay in construction and achievement of peak load factors, we estimate that power prices need to be at €70/MWh for investors to earn a similarly competitive positive return.

Figure 5. Periods (in dark black) in history during which new nuclear plants would generate competitive returns to equity investors in the UK



Source: Platts, CIRA Estimates

Government support still necessary

It is clear from the graph above that were power plants of today's specifications operating during the past decade, they would have only generated a competitive return to equity investors for a period of only 20 months in the last 115.

In recent months, several industry players, including Vincent de Rivaz (EDF Energy CEO), have commented on the need for the UK government to provide some formal support to the projects to build new nuclear power stations in the UK given the low power prices and weak economics of the projects at current price levels.

We believe that if governments want new nuclear to be part of their energy policy, they will need to provide some support as either these plants will not be built or once they are, won't be economically viable. Such steps could include a regulated CO2 price or a fixed-price off-take contract for the output of the plants or guarantees/subsidies on the financing side.

Appendix A-1

Analyst Certification

Each research analyst(s) primarily responsible for the preparation and content of all or any identified portion of this research report hereby certifies that, with respect to each issuer or security or any identified portion of the report with respect to an issuer or security that the research analyst covers in this research report, all of the views expressed in this research report accurately reflect their personal views about those issuer(s) or securities. Each research analyst(s) also certify that no part of their compensation was, is, or will be, directly or indirectly, related to the specific recommendation(s) or view(s) expressed by that research analyst in this research report.

IMPORTANT DISCLOSURES

Rohini Malkani has in the past worked with the India government or its divisions in her personal capacity.

Analysts' compensation is determined based upon activities and services intended to benefit the investor clients of Citigroup Global Markets Inc. and its affiliates ("the Firm"). Like all Firm employees, analysts receive compensation that is impacted by overall firm profitability which includes investment banking revenues.

For important disclosures (including copies of historical disclosures) regarding the companies that are the subject of this Citi Investment Research & Analysis product ("the Product"), please contact Citi Investment Research & Analysis, 388 Greenwich Street, 29th Floor, New York, NY, 10013, Attention: Legal/Compliance. In addition, the same important disclosures, with the exception of the Valuation and Risk assessments and historical disclosures, are contained on the Firm's disclosure website at www.citigroupgeo.com. Valuation and Risk assessments can be found in the text of the most recent research note/report regarding the subject company. Historical disclosures (for up to the past three years) will be provided upon request.

Citi Investment Research & Analysis Ratings Distribution

Data current as of 30 Sep 2009

	Buy	Hold	Sell
Citi Investment Research & Analysis Global Fundamental Coverage	44%	38%	18%
% of companies in each rating category that are investment banking clients	47%	45%	36%

Guide to Citi Investment Research & Analysis (CIRA) Fundamental Research Investment Ratings:

CIRA's stock recommendations include a risk rating and an investment rating.

Risk ratings, which take into account both price volatility and fundamental criteria, are: Low (L), Medium (M), High (H), and Speculative (S).

Investment ratings are a function of CIRA's expectation of total return (forecast price appreciation and dividend yield within the next 12 months) and risk rating.

For securities in developed markets (US, UK, Europe, Japan, and Australia/New Zealand), investment ratings are: Buy (1) (expected total return of 10% or more for Low-Risk stocks, 15% or more for Medium-Risk stocks, 20% or more for High-Risk stocks, and 35% or more for Speculative stocks); Hold (2) (0%-10% for Low-Risk stocks, 0%-15% for Medium-Risk stocks, 0%-20% for High-Risk stocks, and 0%-35% for Speculative stocks); and Sell (3) (negative total return).

For securities in emerging markets (Asia Pacific, Emerging Europe/Middle East/Africa, and Latin America), investment ratings are: Buy (1) (expected total return of 15% or more for Low-Risk stocks, 20% or more for Medium-Risk stocks, 30% or more for High-Risk stocks, and 40% or more for Speculative stocks); Hold (2) (5%-15% for Low-Risk stocks, 10%-20% for Medium-Risk stocks, 15%-30% for High-Risk stocks, and 20%-40% for Speculative stocks); and Sell (3) (5% or less for Low-Risk stocks, 10% or less for Medium-Risk stocks, 15% or less for High-Risk stocks, and 20% or less for Speculative stocks).

Investment ratings are determined by the ranges described above at the time of initiation of coverage, a change in investment and/or risk rating, or a change in target price (subject to limited management discretion). At other times, the expected total returns may fall outside of these ranges because of market price movements and/or other short-term volatility or trading patterns. Such interim deviations from specified ranges will be permitted but will become subject to review by Research Management. Your decision to buy or sell a security should be based upon your personal investment objectives and should be made only after evaluating the stock's expected performance and risk.

Guide to Citi Investment Research & Analysis (CIRA) Corporate Bond Research Credit Opinions and Investment Ratings: CIRA's corporate bond research issuer publications include a fundamental credit opinion of Improving, Stable or Deteriorating and a complementary risk rating of Low (L), Medium (M), High (H) or Speculative (S) regarding the credit risk of the company featured in the report. The fundamental credit opinion reflects the CIRA analyst's opinion of the direction of credit fundamentals of the issuer without respect to securities market vagaries. The fundamental credit opinion is not geared to, but should be viewed in the context of debt ratings issued by major public debt ratings companies such as Moody's Investors Service, Standard and Poor's, and Fitch Ratings. CBR risk ratings are approximately equivalent to the following matrix: Low Risk Triple A to Low Double A; Low to Medium Risk High Single A through High Triple B; Medium to High Risk Mid Triple B through High Double B; High to Speculative Risk Mid Double B and Below. The risk rating element illustrates the analyst's opinion of the relative likelihood of loss of principal when a fixed income security issued by a company is held to maturity, based upon both fundamental and market risk factors. Certain reports published by CIRA will also include investment ratings on specific issues of companies under coverage which have been assigned fundamental credit opinions and risk ratings. Investment ratings are a function of CIRA's expectations for total return, relative return (to publicly available Citigroup bond indices performance), and risk rating. These investment ratings are: Buy/Overweight the bond is expected to outperform the relevant Citigroup bond market sector index (Broad Investment Grade, High Yield Market or Emerging Market), performances of which are updated monthly and can be viewed at <http://sd.ny.ssm.com/> using the "Indexes" tab; Hold/Neutral Weight the bond is expected to perform in line with the relevant Citigroup bond market sector index; or Sell/Underweight the bond is expected to underperform the relevant sector of the Citigroup indexes.

Non-US research analysts who have prepared this report are not registered/qualified as research analysts with the NYSE and/or NASD. Such research analysts may not be associated persons of the member organization and therefore may not be subject to the NYSE Rule 472 and NASD Rule 2711 restrictions on communications with a subject company, public appearances and trading securities held by a research analyst account. The legal entities employing the authors of this report are listed below:

Citigroup Global Markets Ltd

Peter Atherton, Andrew M Simms, Sofia Savvantidou, Stephen B Hunt

OTHER DISCLOSURES

For securities recommended in the Product in which the Firm is not a market maker, the Firm is a liquidity provider in the issuers' financial instruments and may act as principal in connection with such transactions. The Firm is a regular issuer of traded financial instruments linked to securities that may have been recommended in the Product. The Firm regularly trades in the securities of the issuer(s) discussed in the Product. The Firm may engage in securities transactions in a manner inconsistent with the Product and, with respect to securities covered by the Product, will buy or sell from customers on a principal basis.

Securities recommended, offered, or sold by the Firm: (i) are not insured by the Federal Deposit Insurance Corporation; (ii) are not deposits or other obligations of any insured depository institution (including Citibank); and (iii) are subject to investment risks, including the possible loss of the principal amount invested. Although information has been obtained from and is based upon sources that the Firm believes to be reliable, we do not guarantee its accuracy and it may be incomplete and condensed. Note, however, that the Firm has taken all reasonable steps to determine the accuracy and completeness of the disclosures made in the Important Disclosures section of the Product. The Firm's research department has received assistance from the subject company(ies) referred to in this Product including, but not limited to, discussions with management of the subject company(ies). Firm policy prohibits research analysts from sending draft research to subject companies. However, it should be presumed that the author of the Product has had discussions with the subject company to ensure factual accuracy prior to publication. All opinions, projections and estimates constitute the judgment of the author as of the date of the Product and these, plus any other information contained in the Product, are subject to change without notice. Prices and availability of financial instruments also are subject to change without notice. Notwithstanding other departments within the Firm advising the companies discussed in this Product, information obtained in such role is not used in the preparation of the Product. Although Citi Investment Research & Analysis (CIRA) does not set a predetermined frequency for publication, if the Product is a fundamental research report, it is the intention of CIRA to provide research coverage of the/those issuer(s) mentioned therein, including in response to news affecting this issuer, subject to applicable quiet periods and capacity constraints. The Product is for informational purposes only and is not intended as an offer or solicitation for the purchase or sale of a security. Any decision to purchase securities mentioned in the Product must take into account existing public information on such security or any registered prospectus.

Investing in non-U.S. securities, including ADRs, may entail certain risks. The securities of non-U.S. issuers may not be registered with, nor be subject to the reporting requirements of the U.S. Securities and Exchange Commission. There may be limited information available on foreign securities. Foreign companies are generally not subject to uniform audit and reporting standards, practices and requirements comparable to those in the U.S. Securities of some foreign companies may be less liquid and their prices more volatile than securities of comparable U.S. companies. In addition, exchange rate movements may have an adverse effect on the value of an investment in a foreign stock and its corresponding dividend payment for U.S. investors. Net dividends to ADR investors are estimated, using withholding tax rates conventions, deemed accurate, but investors are urged to consult their tax advisor for exact dividend computations. Investors who have received the Product from the Firm may be prohibited in certain states or other jurisdictions from purchasing securities mentioned in the Product from the Firm. Please ask your Financial Consultant for additional details. Citigroup Global Markets Inc. takes responsibility for the Product in the United States. Any orders by US investors resulting from the information contained in the Product may be placed only through Citigroup Global Markets Inc.

Important Disclosures for Morgan Stanley Smith Barney LLC Customers: Morgan Stanley & Co. Incorporated (Morgan Stanley) research reports may be available about the companies that are the subject of this Citi Investment Research & Analysis (CIRA) research report. Ask your Financial Advisor or use smithbarney.com to view any available Morgan Stanley research reports in addition to CIRA research reports.

Important disclosure regarding the relationship between the companies that are the subject of this CIRA research report and Morgan Stanley Smith Barney LLC and its affiliates are available at the Morgan Stanley Smith Barney disclosure website at www.morganstanleysmithbarney.com/researchdisclosures.

The required disclosures provided by Morgan Stanley and Citigroup Global Markets, Inc. on Morgan Stanley and CIRA research relate in part to the separate businesses of Citigroup Global Markets, Inc. and Morgan Stanley that now form Morgan Stanley Smith Barney LLC, rather than to Morgan Stanley Smith Barney LLC in its entirety. For Morgan Stanley and Citigroup Global Markets, Inc. specific disclosures, you may refer to www.morganstanley.com/researchdisclosures and https://www.citigroupgeo.com/geopublic/Disclosures/index_a.html.

This CIRA research report has been reviewed and approved on behalf of Morgan Stanley Smith Barney LLC. This review and approval was conducted by the same person who reviewed this research report on behalf of CIRA. This could create a conflict of interest.

The Citigroup legal entity that takes responsibility for the production of the Product is the legal entity which the first named author is employed by. The Product is made available in Australia through Citigroup Global Markets Australia Pty Ltd. (ABN 64 003 114 832 and AFSL No. 240992), participant of the ASX Group and regulated by the Australian Securities & Investments Commission. Citigroup Centre, 2 Park Street, Sydney, NSW 2000. The Product is made available in Australia to Private Banking wholesale clients through Citigroup Pty Limited (ABN 88 004 325 080 and AFSL 238098). Citigroup Pty Limited provides all financial product advice to Australian Private Banking wholesale clients through bankers and relationship managers. If there is any doubt about the suitability of investments held in Citigroup Private Bank accounts, investors should contact the Citigroup Private Bank in Australia. Citigroup companies may compensate affiliates and their representatives for providing products and services to clients. The Product is made available in Brazil by Citigroup Global Markets Brasil - CCTVM SA, which is regulated by CVM - Comissão de Valores Mobiliários, BACEN - Brazilian Central Bank, APIMEC - Associação Associação dos Analistas e Profissionais de Investimento do Mercado de Capitais and ANBID - Associação Nacional dos Bancos de Investimento. Av. Paulista, 1111 - 11º andar - CEP. 01311920 - São Paulo - SP. If the Product is being made available in certain provinces of Canada by Citigroup Global Markets (Canada) Inc. ("CGM Canada"), CGM Canada has approved the Product. Citigroup Place, 123 Front Street West, Suite 1100, Toronto, Ontario M5J 2M3. The Product is made available in France by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. 1-5 Rue Paul Cézanne, 8ème, Paris, France. The Product may not be distributed to private clients in Germany. The Product is distributed in Germany by Citigroup Global Markets Deutschland AG & Co. KGaA, which is regulated by Bundesanstalt fuer Finanzdienstleistungsaufsicht (BaFin). Frankfurt am Main, Reuterweg 16, 60323 Frankfurt am Main. If the Product is made available in Hong Kong by, or on behalf of, Citigroup Global Markets Asia Ltd., it is attributable to Citigroup Global Markets Asia Ltd., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. Citigroup Global Markets Asia Ltd. is regulated by Hong Kong Securities and Futures Commission. If the Product is made available in Hong Kong by The Citigroup Private Bank to its clients, it is attributable to Citibank N.A., Citibank Tower, Citibank Plaza, 3 Garden Road, Hong Kong. The Citigroup Private Bank and Citibank N.A. is regulated by the Hong Kong Monetary Authority. The Product is made available in India by Citigroup Global Markets India Private Limited, which is regulated by Securities and Exchange Board of India. Bakhtawar, Nariman Point, Mumbai 400-021. The Product is made available in Indonesia through PT Citigroup Securities Indonesia. 5/F, Citibank Tower, Bapindo Plaza, Jl. Jend. Sudirman Kav. 54-55, Jakarta 12190. Neither this Product nor any copy hereof may be distributed in Indonesia or to any Indonesian citizens wherever they are domiciled or to Indonesian residents except in compliance with applicable capital market laws and regulations. This Product is not an offer of securities in Indonesia. The securities referred to in this Product have not been registered with the Capital Market and Financial Institutions Supervisory Agency (BAPEPAM-LK) pursuant to relevant capital market laws and regulations, and may not be offered or sold within the territory of the Republic of Indonesia or to Indonesian citizens through a public offering or in circumstances which constitute an offer within the meaning of the Indonesian capital market laws and regulations. The Product is made available in Italy by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. Foro Buonaparte 16, Milan, 20121, Italy. The Product is made available in Japan by Citigroup Global Markets Japan Inc. ("CGMJ"), which is regulated by Financial Services Agency, Securities and Exchange Surveillance Commission, Japan Securities Dealers Association, Tokyo Stock Exchange and Osaka Securities Exchange. Shin-Marunouchi Building, 1-5-1 Marunouchi, Chiyoda-ku, Tokyo 100-6520 Japan. If the Product was distributed by Nikko Cordial Securities Inc. it is being so distributed under license. In the event that an error is found in an CGMJ research report, a revised version will be posted on the Firm's Global Equities Online (GEO) website. If you have questions regarding GEO, please call (81 3) 6270-3019 for help. The Product is made available in Korea by Citigroup Global Markets Korea Securities Ltd., which is regulated by Financial Supervisory Commission and the Financial Supervisory Service. Hungkuk Life Insurance Building, 226 Shinmunno 1-GA, Jongno-Gu, Seoul, 110-061. The Product is made available in Malaysia by Citigroup Global Markets Malaysia Sdn Bhd, which is regulated by Malaysia Securities Commission. Menara Citibank, 165 Jalan Ampang, Kuala Lumpur, 50450. The Product is made available in Mexico by Acciones y Valores Banamex, S.A. De C. V., Casa de Bolsa, Integrante del Grupo Financiero Banamex

("Accival") which is a wholly owned subsidiary of Citigroup Inc. and is regulated by Comision Nacional Bancaria y de Valores. Reforma 398, Col. Juarez, 06600 Mexico, D.F. In New Zealand the Product is made available through Citigroup Global Markets New Zealand Ltd. (Company Number 604457), a Participant of the New Zealand Exchange Limited and regulated by the New Zealand Securities Commission. Level 19, Mobile on the Park, 157 Lambton Quay, Wellington. The Product is made available in Pakistan by Citibank N.A. Pakistan branch, which is regulated by the State Bank of Pakistan and Securities Exchange Commission, Pakistan. AWT Plaza, 1.1. Chundrigar Road, P.O. Box 4889, Karachi-74200. The Product is made available in Poland by Dom Maklerski Banku Handlowego SA an indirect subsidiary of Citigroup Inc., which is regulated by Komisja Nadzoru Finansowego. Dom Maklerski Banku Handlowego S.A. ul. Chalubinskiego 8, 00-630 Warszawa. The Product is made available in the Russian Federation through ZAO Citibank, which is licensed to carry out banking activities in the Russian Federation in accordance with the general banking license issued by the Central Bank of the Russian Federation and brokerage activities in accordance with the license issued by the Federal Service for Financial Markets. Neither the Product nor any information contained in the Product shall be considered as advertising the securities mentioned in this report within the territory of the Russian Federation or outside the Russian Federation. The Product does not constitute an appraisal within the meaning of the Federal Law of the Russian Federation of 29 July 1998 No. 135-FZ (as amended) On Appraisal Activities in the Russian Federation. 8-10 Gasheka Street, 125047 Moscow. The Product is made available in Singapore through Citigroup Global Markets Singapore Pte. Ltd., a Capital Markets Services Licence holder, and regulated by Monetary Authority of Singapore. 1 Temasek Avenue, #39-02 Millenia Tower, Singapore 039192. The Product is made available by The Citigroup Private Bank in Singapore through Citibank, N.A., Singapore branch, a licensed bank in Singapore that is regulated by Monetary Authority of Singapore. Citigroup Global Markets (Pty) Ltd. is incorporated in the Republic of South Africa (company registration number 2000/025866/07) and its registered office is at 145 West Street, Sandton, 2196, Saxonwold. Citigroup Global Markets (Pty) Ltd. is regulated by JSE Securities Exchange South Africa, South African Reserve Bank and the Financial Services Board. The investments and services contained herein are not available to private customers in South Africa. The Product is made available in Spain by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. 29 Jose Ortega Y Gassef, 4th Floor, Madrid, 28006, Spain. The Product is made available in Taiwan through Citigroup Global Markets Taiwan Securities Company Ltd., which is regulated by Securities & Futures Bureau. No portion of the report may be reproduced or quoted in Taiwan by the press or any other person. No. 8 Manhattan Building, Hsin Yi Road, Section 5, Taipei 100, Taiwan. The Product is made available in Thailand through Citicorp Securities (Thailand) Ltd., which is regulated by the Securities and Exchange Commission of Thailand. 18/F, 22/F and 29/F, 82 North Sathorn Road, Silom, Bangkok, Bangkok 10500, Thailand. The Product is made available in Turkey through Citibank AS which is regulated by Capital Markets Board. Tekfen Tower, Eski Buyukdere Caddesi # 209 Kat 2B, 23294 Levent, Istanbul, Turkey. In the U.A.E, these materials (the "Materials") are communicated by Citigroup Global Markets Limited, DIFC branch ("CGML"), an entity registered in the Dubai International Financial Center ("DIFC") and licensed and regulated by the Dubai Financial Services Authority ("DFSA") to Professional Clients and Market Counterparties only and should not be relied upon or distributed to Retail Clients. A distribution of the different CIRA ratings distribution, in percentage terms for Investments in each sector covered is made available on request. Financial products and/or services to which the Materials relate will only be made available to Professional Clients and Market Counterparties. The Product is made available in United Kingdom by Citigroup Global Markets Limited, which is authorised and regulated by Financial Services Authority. This material may relate to investments or services of a person outside of the UK or to other matters which are not regulated by the FSA and further details as to where this may be the case are available upon request in respect of this material. Citigroup Centre, Canada Square, Canary Wharf, London, E14 5LB. The Product is made available in United States by Citigroup Global Markets Inc, which is regulated by NASD, NYSE and the US Securities and Exchange Commission. 388 Greenwich Street, New York, NY 10013. Unless specified to the contrary, within EU Member States, the Product is made available by Citigroup Global Markets Limited, which is regulated by Financial Services Authority. Many European regulators require that a firm must establish, implement and make available a policy for managing conflicts of interest arising as a result of publication or distribution of investment research. The policy applicable to CIRA's Products can be found at www.citigroupgeo.com. Compensation of equity research analysts is determined by equity research management and Citigroup's senior management and is not linked to specific transactions or recommendations. The Product may have been distributed simultaneously, in multiple formats, to the Firm's worldwide institutional and retail customers. The Product is not to be construed as providing investment services in any jurisdiction where the provision of such services would not be permitted. Subject to the nature and contents of the Product, the investments described therein are subject to fluctuations in price and/or value and investors may get back less than originally invested. Certain high-volatility investments can be subject to sudden and large falls in value that could equal or exceed the amount invested. Certain investments contained in the Product may have tax implications for private customers whereby levels and basis of taxation may be subject to change. If in doubt, investors should seek advice from a tax adviser. The Product does not purport to identify the nature of the specific market or other risks associated with a particular transaction. Advice in the Product is general and should not be construed as personal advice given it has been prepared without taking account of the objectives, financial situation or needs of any particular investor. Accordingly, investors should, before acting on the advice, consider the appropriateness of the advice, having regard to their objectives, financial situation and needs. Prior to acquiring any financial product, it is the client's responsibility to obtain the relevant offer document for the product and consider it before making a decision as to whether to purchase the product.

© 2009 Citigroup Global Markets Inc. Citi Investment Research & Analysis is a division and service mark of Citigroup Global Markets Inc. and its affiliates and is used and registered throughout the world. Citi and Citi with Arc Design are trademarks and service marks of Citigroup Inc and its affiliates and are used and registered throughout the world. All rights reserved. Any unauthorized use, duplication, redistribution or disclosure is prohibited by law and will result in prosecution. Where included in this report, MSCI sourced information is the exclusive property of Morgan Stanley Capital International Inc. (MSCI). Without prior written permission of MSCI, this information and any other MSCI intellectual property may not be reproduced, disseminated or used to create any financial products, including any indices. This information is provided on an "as is" basis. The user assumes the entire risk of any use made of this information. MSCI, its affiliates and any third party involved in, or related to, computing or compiling the information hereby expressly disclaim all warranties of originality, accuracy, completeness, merchantability or fitness for a particular purpose with respect to any of this information. Without limiting any of the foregoing, in no event shall MSCI, any of its affiliates or any third party involved in, or related to, computing or compiling the information have any liability for any damages of any kind. MSCI, Morgan Stanley Capital International and the MSCI indexes are services marks of MSCI and its affiliates. The information contained in the Product is intended solely for the recipient and may not be further distributed by the recipient. The Firm accepts no liability whatsoever for the actions of third parties. The Product may provide the addresses of, or contain hyperlinks to, websites. Except to the extent to which the Product refers to website material of the Firm, the Firm has not reviewed the linked site. Equally, except to the extent to which the Product refers to website material of the Firm, the Firm takes no responsibility for, and makes no representations or warranties whatsoever as to, the data and information contained therein. Such address or hyperlink (including addresses or hyperlinks to website material of the Firm) is provided solely for your convenience and information and the content of the linked site does not in anyway form part of this document. Accessing such website or following such link through the Product or the website of the Firm shall be at your own risk and the Firm shall have no liability arising out of, or in connection with, any such referenced website.

ADDITIONAL INFORMATION IS AVAILABLE UPON REQUEST