

Japan Credit Rating Agency, Ltd. (JCR) announces the following credit rating.

SAIBU GAS HOLDINGS CO., LTD. (security code: 9536)

<Affirmation>

Long-term Issuer Rating:	AA-
Outlook:	Stable
Bonds:	AA-
Shelf Registration:	Preliminary AA-
CP:	J-1+

Rationale

- (1) SAIBU GAS HOLDINGS CO., LTD. (the “Company”) is the pure holding company of the Saibu Gas Group centered on SAIBU GAS CO., LTD., a major city gas company supplying gas to Fukuoka, Kitakyushu, Kumamoto, Nagasaki and other areas. It shifted to a pure holding company structure as of today. Given its strong unity with operating companies under the umbrella in terms of management, financing, capital, etc., JCR reflects the Group’s overall creditworthiness in its ratings. City gas demand in the Company’s service areas is large, and stable and profitable household demand accounts for a relatively large portion of total demand. The Company is also actively working on business diversification and plans to increase the sales ratio of businesses other than gas energy, such as electricity, real estate and foods, to as high as 50% in the future.
- (2) The Company is not in a situation where its business bases centering on city gas are drastically harmed. Since the full liberalization of the retail city gas market, it has been continuously losing city gas customers due to competition with Kyushu Electric Power Company, Incorporated but at the same time acquiring electricity customers at an equal pace. Although attention must be paid to how competition in the liberalized market will affect profits, JCR assumes that the Company can maintain its solid cash flow generation capacity, backed by the real estate business, etc. Financial structure leaves much room for improvement, but further deterioration will likely be avoided. Based on the above, JCR affirmed the ratings on the Company and retained the Stable outlook.
- (3) According to the latest announcement, the Company forecasts an operating income of 4 billion yen for the fiscal year ending March 2021 (FY2020), down 47.1% from the previous year, as falls in the sales volume of industrial gases and profitability of the foods business in the midst of the COVID crisis are pushing down overall results. The electricity business also appears to have been affected by this winter’s price surge in the wholesale electricity market. JCR views that the impacts of the COVID crisis will lessen from FY2021 onward, but the fact that there are areas including foods where demand recovery is quite unpredictable must be taken into consideration. Meanwhile, the Company set up three regional companies in Kumamoto, Nagasaki and Sasebo to conduct efficient business management based on regional characteristics. Whether it will gain greater earnings power as a result will be closely watched. The Company is also gradually implementing measures to effectively use the Hibiki LNG terminal, including the export of LNG, and their progress will be monitored.
- (4) Equity ratio as of December 31, 2020 was 19.2%, as opposed to 19.9% at March 31, 2020. Given increasing business risks due to the liberalization of energies and business diversification, the Company faces a major challenge of improving the financial structure. It intends to make aggressive investments in growth areas, such as real estate, under the current medium-term plan, but investment plans have been reviewed flexibly according to changes in the business environment, which suggests that the financial structure will most likely be maintained at around the current level. That said, in the event that the Company decides to, for instance, construct a LNG-fired thermal power plant or additional LNG tanks as part of its plan to utilize the Hibiki LNG terminal, how this will affect the financial structure requires attention.

Shigenobu Tonomura, Yusuke Tsuboi

Rating

Issuer: SAIBU GAS HOLDINGS CO., LTD.

<Affirmation>

Long-term Issuer Rating: AA- Outlook: Stable

Issue	Amount (bn)	Issue Date	Due Date	Coupon	Rating
Bonds no. 11	JPY 10	Jan. 25, 2012	Jan. 25, 2022	1.141%	AA-
Bonds no. 12	JPY 10	Dec. 13, 2013	Dec. 13, 2023	0.808%	AA-
Bonds no. 13	JPY 10	Apr. 14, 2015	Apr. 14, 2025	0.555%	AA-
Bonds no. 14	JPY 5	Mar. 16, 2017	Mar. 16, 2027	0.380%	AA-
Bonds no. 15	JPY 10	Dec. 13, 2018	Dec. 13, 2038	0.820%	AA-
Bonds no. 16	JPY 10	Dec. 13, 2018	Dec. 13, 2028	0.355%	AA-
Bonds no. 17	JPY 10	July 16, 2020	July 13, 2040	0.700%	AA-

Shelf Registration: Preliminary AA-

Maximum: JPY 50 billion

Valid: two years effective from September 1, 2020

CP: J-1+

Maximum: JPY 50 billion

Rating Assignment Date: April 1, 2021

The assumptions for the credit ratings and the definitions of the rating symbols are published as "Types of Credit Ratings and Definitions of Rating Symbols" (January 6, 2014) in Information about JCR Ratings on JCR's website (<https://www.jcr.co.jp/en/>).

Outline of the rating methodology is shown as "JCR's Rating Methodology" (November 7, 2014), "City Gas" (April 24, 2017), "Rating Methodology for a Holding Company" (January 26, 2015) and "Rating Viewpoints on Pure Holding Companies (Domestic Industrial Corporations)" (July 1, 2003) in Information about JCR Ratings on JCR's website (<https://www.jcr.co.jp/en/>).

Glossary:

A preliminary rating is a credit rating assigned as a preliminary evaluation while material terms for issue to be rated are not yet finalized. When the issuing terms are finalized, JCR will confirm them and will assign a credit rating anew. The rating level of the final rating may be different from that of the preliminary rating, depending on the final content of the terms, etc.

Japan Credit Rating Agency, Ltd.

Jiji Press Building, 5-15-8 Ginza, Chuo-ku, Tokyo 104-0061, Japan
Tel. +81 3 3544 7013, Fax. +81 3 3544 7026

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JCR publishes its press releases regarding the rating actions both in Japanese and in English on the same day. In case that it takes time to translate rating rationale, JCR may publicize the summary version, which will be replaced by the full translated version within three business days. (Regarding Structured Finance products, JCR only publicize the summary version in English.)

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INFORMATION DISCLOSURE FORM

Japan Credit Rating Agency, Ltd.

Disclosure Required by Paragraph (a)(1)(ii) of Rule 17g-7

Issuer:	SAIBU GAS HOLDINGS CO., LTD.
Rating Publication Date:	April 1, 2021

1

The Symbol, Number, or Score in the Rating Scale used to Denote Credit Rating Categories and Notches and, the Identity of the Obligor or the Identity and a Description of the Security or Money Market Instrument as Required by Paragraph (a)(1)(ii)(A) of Rule 17g-7

- Please see the news release. If the credit rating is a private rating, please see the report for private rating.

2

The version of the procedure or methodology used to determine the credit rating; as Required by Paragraph (a)(1)(ii)(B) of Rule 17g-7

- Please see the news release. If the credit rating is a private rating, please see the report for private rating.

3

The Main Assumptions and Principles used in Constructing the Procedures and Methodologies used to Determine the Credit Rating as Required by Paragraph (a)(1)(ii)(C) of Rule 17g-7

- The credit rating methodology assumes, in principle, to be applied to assess the likelihood of a given debt payment in light of its issuer's condition and business environment, etc. in the relevant future. There is certain limitation, however, in the time horizon that the rating foresees.
- The credit rating methodology assumes, in principle, that the factors posted in the below are particularly important for such likelihood to be determined, and that the rating determination is made by evaluating each of them not only quantitatively but also employing qualitative analyses.

A) Business Bases

The likelihood of a given debt payment is highly conditional to its issuer's business bases - how they can be maintained/ expanded into the future and thereby secure earnings and cash flows in adequacy and in a sustainable way.

B) Financial Grounds and Asset Quality

The likelihood of debt payment is highly dependent on the degree of the issuer's indebtedness and loss absorption capacity in terms of equity capital. Also notable is that a financial institution might see a significant loss of financial grounds as a result of changes in value of the assets under its possession.

C) Liquidity Positions

The likelihood of debt payment is highly dependent on the adequacy of the issuer's cash and other sources of repayment (liquidity positions).

D) Related Parties' Status and Stance of Support/ Assistance for the Issuer

The likelihood of debt payment is affected one way or the other by the issuer's related parties such as parent company, subsidiary, guarantor, and the government of the issuer's business domicile, etc. - by their own conditions and/ or position of support/ assistance for the issuer.

E) Order of Seniority in Debt Payment

The likelihood of debt payment can be different between given debts of the same issuer. The likelihood of debt payment for an individual debt is dependent on the issuer's discretion, and/ or its rank relative to other debts of the same issuer in the order of seniority in principal/ interest payment which is determined by design as financial product or by laws, etc.

4 The Potential Limitations of the Credit Rating as Required by Paragraph (a)(1)(ii)(D) of Rule 17g-7

- The credit rating herewith presented by JCR is its summary opinion with regard to the likelihood of given debt payment and hence not necessarily a perfect representation of such likelihood. The credit rating is not intended to estimate the probability of default or the loss on given default, either.
- The objective of the credit rating herewith presented does not include any concerns other than the likelihood of debt payment, such as risks of price changes, market liquidity, etc.
- The credit rating herewith presented is necessary to be reviewed along with possible changes of the issuer of rated objects in its business performance and/ or circumstances which include regulatory environment, and hence subject to possible alteration.

5 Information on the Uncertainty of the Credit Rating as Required by Paragraph (a)(1)(ii)(E) of Rule 17g-7

- The information used for the determination of credit rating as herewith presented is obtained by JCR from the issuer of rated objects and other sources that JCR trusts in terms of accuracy and reliability but possibly contains errors due to human, non-human or other causes. Consequently, the credit rating determined on the grounds of such information does not constitute, explicitly or implicitly, any representation or warrant of JCR on the information itself or any consequences of its use in terms of accuracy, relevance, timeliness, wholeness, market value, or usefulness for any specific purposes.

6 Use of Due Diligence Services of a Third Party in Taking the Rating Action as Required by Paragraph (a)(1)(ii)(F) of Rule 17g-7

- There is no use of any third-party due diligence service in the determination of the credit rating herewith presented.

7 Use of Servicer or Remittance Reports to Conduct Surveillance of the Credit Rating Required by Paragraph (a)(1)(ii)(G) of Rule 17g-7

- There is no use of any servicer or remittance report to conduct surveillance of the credit rating herewith presented.

8 The Types of Data Relied Upon for the Purpose of Determining the Credit Rating as Required by Paragraph (a)(1)(ii)(H) of Rule 17g-7

- The information posted in the below, which includes data, is used for the determination of the credit rating herewith presented.

A) Audited financial statements presented by the rating stakeholders

B) Explanations of business performance, management plans, etc. presented by the rating stakeholders

9 Overall assessment of the Quality of Information Available and Considered in Determining the Credit Rating as Required by Paragraph (a)(1)(ii)(I) of Rule 17g-7

- JCR holds its basic policies for securing the quality of information as a base of due diligence for the determination of credit ratings. The information used as a base for the determination of credit rating herewith presented satisfies such policies, which include the audit by an independent auditor, the warranty made by the issuer, the publication by the issuer, some independent media or, otherwise, JCR analyst's scrutiny, etc.
- JCR sees no particular weakness in the quality of information used for the determination of the credit rating herewith presented as compared to the information used in other cases of the credit rating for comparable issuers or ratable objects.
- If the credit rating is an Indication, please see the report for Indication.

10 Information Relating to Conflicts of Interest as Required by Paragraph (a)(1)(ii)(J) of Rule 17g-7

- JCR receives payment of compensation for the determination of the credit rating herewith presented from either one of those parties who are issuer, underwriter, depositor or sponsor.
- JCR did not receive in the last fiscal year in the past payment of compensation from the same party for any kind of JCR's service other than the determination of public or private credit rating, such as one in the ancillary business.

11 Explanation or Measure of the Potential Volatility of the Credit Rating as Required by Paragraph (a)(1)(ii)(K) of Rule 17g-7

A) Business Bases

The credit rating is subject to alteration if there is improvement or deterioration of the issuer's business bases, since its revenue, etc. may improve or deteriorate by the change in its business management policies, clients' preferences, competitive situation, or a technological innovation. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change in the business bases is large.

B) Financial Grounds and Asset Quality

The credit rating is subject to alteration if the issuer increases/ decreases its debt/ capital or vice versa and thereby makes its individual debt payment liability less or more bearable and its loss absorption capacity into the future decreased or increased. Also, the changes in the quality of asset under the issuer's holding may affect the credit rating, since such changes could raise or lower the likelihood of future loss of the issuer's financial grounds. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change in the financial grounds and/ or asset quality is large.

C) Liquidity Positions

The credit rating is subject to alteration if there is a change in the issuer's financial management policy or in the relations with fund procurement sources and the change thereby makes its liquidity positions improve or deteriorate. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change is large.

D) Related Parties' Status and Stance of Support/ Assistance for the Issuer

The credit rating is subject to alteration if there is a change in the issuer's parent company or subsidiary, guarantor or other provider of credit enhancement, or the government of the issuer's business domicile, or other related parties' own conditions and/ or position of support/ assistance for the issuer, and the change thereby makes its business bases, financial grounds and/ or liquidity positions improve or deteriorate, and/ or making the effectiveness of guarantee and other credit enhancement improve or deteriorate. The resultant alteration of the credit rating is usually a notch, with possibility of a few notches if and when the change is large.

E) Order of Seniority in Debt Payment and Non-Payment Forgiven by Contract

The credit rating is subject to alteration if there is a change in the rated debt's status in the order of seniority relative to other debts caused by the improvement/ deterioration of the issuer's financial condition. The resultant alteration of the credit rating is usually a notch, with possibility of a few notches if and when the change is large. Also, in case of the financial products for which non-payment of interest/ principal is contractually permissible, the credit rating is subject to alteration if and when the likelihood of such non-payment is projected to increase or decrease. The resultant alteration of the credit rating could be by a notch but often as much as a few notches.

F) Rise and Fall in General Economy and Markets

The credit rating is subject to alteration if there is a rise/ fall in the general economy and/ or the markets inducing the issuer's revenues/ expenses to increase/ decrease and vice versa, etc. The resultant alteration of the credit rating is usually by a notch, with possibility of a few notches if and when the change is exceptionally large.

G) Various Events

The credit rating is subject to alteration on occurrence of various events, such as change in the issuer's major shareholders, M&A and other organizational change, accident, violation of the law, litigation, legal/ regulatory change, natural disaster, etc., which are unforeseeable at the time when the credit rating is determined, causing a significant change on the issuer's business bases, financial grounds, etc. The resultant alteration of the credit rating could be by a notch but more often than not as much as a few notches.

12

Information on the Content of the Credit Rating, Including the Historical Performance of the Credit Rating and the Expected Probability of Default and the Expected Loss in the Event of Default as Required by Paragraph (a)(1)(ii)(L) of Rule 17g-7

- Historical records of the credit rating herewith presented are posted in the end of this paper.
- The credit rating herewith presented by JCR is its summary opinion with regard to the likelihood of given debt payment and hence not necessarily a perfect representation of such likelihood. The credit rating is not intended to estimate the probability of default or the loss on given default, either.
- Facts of the probability of default are posted as Form NRSRO Exhibit 1 on the JCR website under the URL:

<https://www.jcr.co.jp/en/service/company/regu/nrsro/>

13

Information on the Sensitivity of the Credit Rating to Assumptions Made as Required by Paragraph (a)(1)(ii)(M) of Rule 17g-7

A) Business Bases

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the issuer's business bases and powers of earning or cash flow generation, etc. The resultant change of the credit rating is most likely by a notch, as JCR speculates, but possibly as much as a few notches if the development is rapid in improvement or deterioration of the issuer's business bases on some drastic change in the operational environments, etc.

B) Financial Grounds and Asset Quality

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the issuer's financial grounds and asset

quality. The resultant change of the credit rating is most likely by a notch, as JCR speculates, but possibly as much as a few notches if the development is rapid in improvement or deterioration of the issuer's financial grounds and/ or asset quality on some drastic change in its business bases.

C) Liquidity Risks

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the issuer's liquidity positions. The resultant change of the credit rating is most likely by a notch, as JCR speculates, but possibly as much as a few notches if the development is rapid in improvement or deterioration of the issuer's liquidity positions on some drastic change in its financial management policy or relations with fund procurement sources, etc.

D) Order of Seniority in Debt Payment and Non-Payment Forgiven by Contract

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the order of seniority in repayment of interests and principal. JCR assumes the resultant change of the credit rating is most likely by a notch. The change could be as much as a few notches if the issuer's financial structure differs so much and thereby the balance between debts shifted so greatly. Rating change is also possible in case of the financial products for which non-payment of interest/ principal is contractually permissible, if and when the assumptions made at the time of its determination turns out to be inaccurate. The change of the credit rating is assumed to be by a notch but often as much as a few notches.

E) Rise and Fall in General Economy and Markets

The credit rating herewith presented could be changed if and when the assumptions made at the time of its determination turn out to be inaccurate with regard to the prospects of general economy and markets. JCR expects the change should be most likely by a notch but could be as much as a few notches, should the economy or the markets change so greatly.

14

Information on the Representations, Warranties, and Enforcement Mechanisms of an Asset-backed Security as Required by Paragraph (a)(1)(ii)(N) of rule 17g-7

- The credit rating herewith presented is not for an ABS product, and hence no relevant issue.

Japan Credit Rating Agency, Ltd.

Jiji Press Building, 5-15-8 Ginza, Chuo-ku, Tokyo 104-0061, Japan
Tel. +81 3 3544 7013, Fax. +81 3 3544 7026

The Historical Performance of the Credit Rating

Issuer Name	Issue Name	Publication Date	Rating	Outlook/Direction
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	March 15, 2006	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	March 16, 2007	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	March 13, 2008	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	March 16, 2009	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	January 18, 2010	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 25, 2011	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 25, 2012	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 3, 2013	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 3, 2014	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 22, 2015	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	August 9, 2016	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 20, 2017	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	May 2, 2018	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 23, 2019	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	Issuer(Long-term)	April 20, 2020	AA-	Stable
SAIBU GAS HOLDINGS CO., LTD.	CP	June 16, 1992	J-1	
SAIBU GAS HOLDINGS CO., LTD.	CP	July 26, 1993	J-1	
SAIBU GAS HOLDINGS CO., LTD.	CP	August 29, 1995	J-1	
SAIBU GAS HOLDINGS CO., LTD.	CP	October 11, 1996	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	October 19, 1998	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	November 16, 1999	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	January 15, 2001	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	February 5, 2002	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	March 14, 2003	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	March 25, 2004	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	March 14, 2005	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	March 15, 2006	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	March 16, 2007	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	March 13, 2008	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	March 16, 2009	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	January 18, 2010	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 25, 2011	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 25, 2012	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 3, 2013	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 3, 2014	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 22, 2015	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	August 9, 2016	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 20, 2017	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	May 2, 2018	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 23, 2019	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	CP	April 20, 2020	J-1+	
SAIBU GAS HOLDINGS CO., LTD.	Shelf Registration	September 1, 2020	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	January 18, 2012	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	April 25, 2012	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	April 3, 2013	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	April 3, 2014	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	April 22, 2015	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	August 9, 2016	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	April 20, 2017	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	May 2, 2018	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	April 23, 2019	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.11	April 20, 2020	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	December 6, 2013	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	April 3, 2014	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	April 22, 2015	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	August 9, 2016	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	April 20, 2017	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	May 2, 2018	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	April 23, 2019	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.12	April 20, 2020	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.13	April 7, 2015	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.13	April 22, 2015	AA-	

The Historical Performance of the Credit Rating

Issuer Name	Issue Name	Publication Date	Rating	Outlook/Direction
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.13	August 9, 2016	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.13	April 20, 2017	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.13	May 2, 2018	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.13	April 23, 2019	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.13	April 20, 2020	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.14	March 10, 2017	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.14	April 20, 2017	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.14	May 2, 2018	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.14	April 23, 2019	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.14	April 20, 2020	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.15	December 7, 2018	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.15	April 23, 2019	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.15	April 20, 2020	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.16	December 7, 2018	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.16	April 23, 2019	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.16	April 20, 2020	AA-	
SAIBU GAS HOLDINGS CO., LTD.	Bonds no.17	July 10, 2020	AA-	

Attestation Required by Paragraph (a)(1)(iii) of Rule 17g-7

I, Shigenobu Tonomura, have responsibility to this Rating Action and to the best of my knowledge:

- A) No part of the credit rating was influenced by any other business activities.
- B) The credit rating was based solely upon the merits of the obligor, security, or money market instrument being rated.
- C) The credit rating was an independent evaluation of the credit risk of the obligor, security, or money market instrument.

殿村 成信

Shigenobu Tonomura

General Manager of Corporate Rating Department II

Japan Credit Rating Agency, Ltd.

Jiji Press Building, 5-15-8 Ginza, Chuo-ku, Tokyo 104-0061, Japan
Tel. +81 3 3544 7013, Fax. +81 3 3544 7026