

**Rating Action: Moody's assigns provisional (P)Aa3, on review for upgrade to
NORD/LB Luxembourg S.A. Covered Bond Bank - Renewable Energy Covered
Bonds**

16 Oct 2019

Frankfurt am Main, October 16, 2019 -- Moody's Investors Service ("Moody's") has today assigned a provisional (P)Aa3, on review for upgrade, long-term rating to the Renewable Energy Covered Bonds (Lettre de Gage énergies renouvelables or covered bonds) issued by NORD/LB Luxembourg S.A. Covered Bond Bank (the issuer), (deposits Baa2, on review for upgrade; adjusted baseline credit assessment ba3, on review for upgrade; counterparty risk (CR) assessment Baa2(cr), on review for upgrade), which are governed by the the Luxembourg legal framework for covered bonds.

RATINGS RATIONALE

A covered bond benefits from (1) the issuer's promise to pay interest and principal on the bonds; and (2) following a CB anchor event, the economic benefit of a collateral pool (the cover pool). The ratings therefore reflect the following factors:

(1) The credit strength of NORD/LB Luxembourg S.A. Covered Bond Bank (deposits Baa2, on review for upgrade; adjusted baseline credit assessment ba3, on review for upgrade; counterparty risk (CR) assessment Baa2(cr), on review for upgrade).

(2) Following a CB anchor event the value of the cover pool. The stressed level of losses on the cover pool assets following a CB anchor event (cover pool losses) for this transaction is 34.7%.

Moody's considered the following factors in its analysis of the cover pool's value:

a) The credit quality of the assets backing the covered bonds. The renewable energy covered bonds are backed by renewable energy project finance loans. The collateral score for the cover pool is 31.3%.

b) The legal framework and the structure of the programme. Notable aspects of the legislation for the renewable energy covered bonds compared to the Luxembourg-law based public-sector covered bonds include a 12-month soft bullet maturity feature of the covered bonds.

c) The exposure to market risk, which is 19.1% for this cover pool.

d) The over-collateralisation (OC) in the cover pool will depend on the notional amount of the cover pool at the time of the initial issuance and the initial covered bond issuance amount. Moody's expects that NORD/LB Luxembourg S.A. Covered Bond Bank will provide a minimum OC of 14.5% of which 2% will be on a "committed" basis (see Key Rating Assumptions/Factors, below).

The TPI assigned to this transaction is Improbable. Moody's TPI framework does constrain the rating of the covered bonds at its current level.

The review for upgrade of the provisional covered bond rating is due to the current review for upgrade of the issuer's counterparty risk assessment. An upgrade of the issuer's counterparty risk assessment could trigger an upgrade of the covered bond rating.

As per 31 August 2019, the total value of the assets included in the cover pool was approximately EUR 358.3million, comprising 25 renewable energy project loans. 20 of these projects are wind farms (85.6% of nominal value) and five are solar energy projects (14.4%). 61.3% of the total cover pool amount is backed by projects in Ireland, while the remainder is backed by projects in France, UK, Germany and Sweden.

Moody's issues provisional ratings in advance of the final sale of securities and these ratings only represent Moody's preliminary opinion. Upon a conclusive review of the transaction and associated documentation Moody's will endeavour to assign a definitive rating to the covered bonds.

KEY RATING ASSUMPTIONS/FACTORS

Moody's determines covered bond ratings using a two-step process: an expected loss analysis and a TPI framework analysis.

EXPECTED LOSS: Moody's uses its Covered Bond Model (COBOL) to determine a rating based on the expected loss on the bond. COBOL determines expected loss as (1) a function of the probability that the issuer will cease making payments under the covered bonds (a CB anchor event); and (2) the stressed losses on the cover pool assets following a CB anchor event.

The CB anchor for this programme is CR assessment plus 1 notch.

The cover pool losses for NORD/LB Luxembourg S.A. Covered Bond Bank's renewable energy covered bonds are 34.7%. This is an estimate of the losses Moody's currently models following a CB anchor event. Moody's splits cover pool losses between market risk of 19.1% and collateral risk of 15.6%. Market risk measures losses stemming from refinancing risk and risks related to interest-rate and currency mismatches (these losses may also include certain legal risks). Collateral risk measures losses resulting directly from cover pool assets' credit quality. Moody's derives collateral risk from the collateral score, which for this programme is currently 31.3%.

The over-collateralisation in the cover pool will depend on the notional amount of the cover pool at the time of the initial issuance and the initial covered bond issuance amount. We expect that NORD/LB Luxembourg S.A. Covered Bond Bank will provide a minimum OC of 14.5%, of which 2.0% will be on a "committed" basis. Under Moody's COBOL model, the minimum OC consistent with the (P)Aa3 rating is 14.5%, of which 0% needs to be in "committed" form to be given full value. These numbers show that Moody's is relying on "uncommitted" OC in its expected loss analysis.

For further details on cover pool losses, collateral risk, market risk, collateral score and TPI Leeway across covered bond programmes rated by Moody's please refer to "Covered Bonds Sector Update", published quarterly.

TPI FRAMEWORK: Moody's assigns a "timely payment indicator" (TPI), which measures the likelihood of timely payments to covered bondholders following a CB anchor event. The TPI framework limits the covered bond rating to a certain number of notches above the CB anchor.

RATING METHODOLOGY

The methodologies used in this rating were "Moody's Approach to Rating Covered Bonds" published in February 2019, and "Moody's Approach to Rating Collateralized Debt Obligations Backed by Project Finance and Infrastructure Assets" published in July 2019. Please see the Rating Methodologies page on www.moody.com for a copy of these methodologies.

FACTORS THAT WOULD LEAD TO AN UPGRADE OR DOWNGRADE OF THE RATING:

The CB anchor is the main determinant of a covered bond programme's rating robustness. A change in the level of the CB anchor could lead to an upgrade or downgrade of the covered bonds. The TPI Leeway measures the number of notches by which Moody's might lower the CB anchor before the rating agency downgrades the covered bonds because of TPI framework constraints.

Based on the current TPI of "Improbable", the TPI Leeway for this programme is 0 notches. This implies that Moody's might downgrade the covered bonds because of a TPI cap if it lowers the CB anchor by 1 notch all other variables being equal.

A multiple-notch downgrade of the covered bonds might occur in certain circumstances, such as (1) a country ceiling or sovereign downgrade capping a covered bond rating or negatively affecting the CB Anchor and the TPI; (2) a multiple-notch downgrade of the CB Anchor; or (3) a material reduction of the value of the cover pool.

REGULATORY DISCLOSURES

For further specification of Moody's key rating assumptions and sensitivity analysis, see the sections Methodology Assumptions and Sensitivity to Assumptions of the disclosure form.

Moody's did not use any stress scenario simulations in its analysis.

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