

Exhibit 8

MOODY'S INVESTORS SERVICE

Rating Update: MOODY'S AFFIRMS Aa2 RATING ON SACRAMENTO SUBURBAN WATER DISTRICT CERTIFICATES OF PARTICIPATION

Global Credit Research - 02 Sep 2010

\$114.8 Million of Parity Debt Affected

Water/Sewer
CA

Opinion

NEW YORK, Sep 2, 2010 -- Moody's Investors Service has affirmed the Aa2 underlying rating on the Sacramento Suburban Water Districts' outstanding parity Certificates of Participation (COPs), Series 2005B, 2008A-2, 2009A and 2009B. The COPs are secured by a senior lien on the district's net revenues.

RATINGS RATIONALE

The rating reflects the district's favorable water supplies, strong financial performance, essentially built-out, and diverse residential service area which is likely to perform better in the current market than newer communities in the Sacramento area. The district's high debt levels and somewhat weak security features are a key component of the rating, mitigated by the expectation that the district will not be issuing additional debt. The risks and benefits posed by the district's variable rate debt and interest rate swap also are factored into the rating, together with the substantial reserves held by the district. The district's thoughtful debt management is noted as a credit strength, as evident by the decision to replace one of its Letters of Credit (LOC) early in order to minimize rollover risk.

FINANCIAL OPERATIONS REMAIN STRONG; CIP EXPECTED TO BE CASH-FUNDED, YIELDING ONGOING STRONG DEBT SERVICE COVERAGE

The district's financial operations have been sound and are expected to remain so. The district generated an operating ratio of 40.1% in fiscal 2009 (fiscal year ending December 31) and an estimated 42.0% for the current fiscal year, both very strong figures by comparison with other rated water districts. Similarly the district's net take-down of 61.3% in fiscal 2009 and estimated 59.5% in fiscal 2010 are quite healthy. Debt service coverage is notably strong, having risen to 3.29x excluding connection fees in fiscal 2009 as net revenues rose to \$27 million from \$26 million the prior year. The increase was primarily attributable to a one-time transaction, the sale of excess surface water to the California Drought Water Bank. For fiscal 2010 the district anticipates net revenues will return to \$24.8 million, an 8.5% decrease from fiscal 2009 but 2.6% increase over the more typical fiscal 2008 figure.

The district's debt service coverage levels have been sound, and are likely to remain so given that the district expects to cash-fund its capital plan. The district's three most recent rate increases of 13% in each of fiscal 2007, 2008 and 2009 generated rising annual debt service coverage levels of 2.47 times, 2.84 times and 3.33 times, respectively, all strong levels. The district's fiscal 2010 estimates are for 3.4x coverage of annual debt service and 1.58x coverage of maximum annual debt service, the latter not extraordinary but certainly satisfactory. The district expects to raise rates going forward as needed to generate sufficient cash to address its capital improvement plan (CIP). A rate study for this purpose is currently underway. The precise annual amounts needed under the district's CIP are somewhat nebulous, with the entire CIP totaling around \$68 million but with the period of time to completion fairly flexible. The CIP is for rehabilitation and replacement of existing infrastructure, with no urgent or mandated projects. Among the required projects are installation of meters for all customers by 2025; currently 55% of all connections are metered and the district anticipates completion of the project by the deadline, if not sooner. The district is firm in its commitment that it will not issue additional debt for the CIP or for any other purpose. Debt service coverage levels will therefore depend upon the amount of its CIP that the district opts to fund in a given year.

LIQUIDITY POSITION STRENGTHENED; DEBT LEVEL HIGH, THOUGH PORTFOLIO SIMPLIFIED

The district's balance sheet features high debt levels, with the large variable rate exposure a credit risk mitigated by satisfactory liquidity and strong debt management. The district's debt level is high, but has declined and is expected to continue to do so given that no additional issuance is anticipated. At 48.4% in fiscal 2009 the district's debt ratio continues its slow, steady decline though is still well above the norm for California water service providers. Principal payout remains slow at about 41% in ten years. Given that the district does not anticipate issuing additional debt, however, these are negative credit factors which will naturally abate over time. As the district is projecting no additional borrowing and strong coverage on its existing debt, the somewhat thin rate covenant and additional bonds test of 1.15x is not a material credit negative.

The district's variable rate debt represents about two-thirds of its total debt portfolio, a high level of exposure to the risks associated with such debt. All of its variable rate debt is swapped to fixed. The District's unrestricted cash and investments, totaling \$51 million at fiscal year end 2009 are more than sufficient to offset the basis risk of the swapped obligations and the variable rate risk of the unswapped component. Equally important, should there be a market failure preventing remarketing of the District's variable rate financings, the District's cash position is sufficient to give it ample time to either refinance or raise revenues sufficient to adjust to its increased expenses. The district does not anticipate spending down its cash despite its planned pay-go funding of capital expenditures. The current rating assumes that the District's cash and investments will remain at approximately current levels, and available to offset risks associated with its exposure to variable rate debt.

The district's careful debt management is a key credit strength. With its 2009 issue the district chose to diversify the provider and rollover risks associated with its letters of credit (LOC). The LOC supporting its Series 2009A variable rate obligations is provided by Sumitomo Mitsui Bank and expires in 2012. The district is currently replacing the LOC associated with its Series 2008A-2 COP. The outstanding LOC provided by Allied Irish Bank expires in 2011, and the district has prudently decided to replace it early in order to eliminate the rollover risk inherent in the 2011 date (when it is anticipated that many other issuers will be seeking rollovers as well.) The proposed new LOC from Lloyds TSB Bank is expected to expire in 2013. As currently presented, terms of the proposed LOC do not pose an undue risk to the district, particularly in light of its strong cash position.

The Swap Agreement hedging the District's variable rate debt does not pose a credit concern. The counterparty on the transaction is Citibank, N.A. (A1/A+/A+). Regular swap payments are on parity with the obligations being rated while the termination payment is subordinate. The District is subject to collateral posting with a threshold of \$20 million at the Aa2 rating level. At this time, its market value is negative \$8.2 million. The termination rating trigger is Baa1 for both the District and the counterparty.

SYSTEM PROVIDES WATER SERVICE TO ESSENTIALLY BUILT-OUT RESIDENTIAL COMMUNITY

The system provides retail water service to a large service area immediately north of the City of Sacramento with a population of approximately 158,000. The service area covers 23,020 acres and includes parts of the cities of Sacramento and Citrus Heights as well as all or a portion of various unincorporated communities. Customer connections total a sizable 44,147, with residential customers accounting for about 70% of water revenues. The system's customer base is very diverse, with the ten largest customers accounting for only 4.3% of fiscal 2009 revenues. The service area is feeling the effects of the current difficult economic environment, and 13.1% of customer accounts are more than 30 days past due. However, the situation is improving: accounts more than 30 days past due represent only about 1.4% of water sales revenues compared to 2.26% of total annual water sales as of December 31, 2008 and 2.71% one year earlier.

DISTRICT'S GROUNDWATER SUPPLY IS AMPLE

The District is in a very strong position with respect to water supply, a notable strength at this time by comparison with other California water systems. The District has rights to groundwater sufficient to meet all its annual needs. The District pumps groundwater from 89 wells, which are capable of producing 100% of the annual District water usage for at least two years. The District's groundwater meets all applicable regulatory requirements. The district also obtains surface water pursuant to agreements with Placer County Water Agency and the City of Sacramento that allow for groundwater replenishment. The Placer County agreement, which expires in 2025, allows the District to purchase 24,000 acre-feet (AF) in 2009, increasing to 29,000 AF by 2014, subject to availability; this water is treated pursuant to a contract, which has no expiration date, with the San Juan Water District. The Sacramento agreement, which also has no expiration date, allows the District to purchase 22,400 AF, again subject to specific conditions. In coming years the District anticipates about 20% of its supply will come from the city, 15% from Placer County, and the remainder from its own groundwater sources. At this time the District's surface water sources, which are derived from the American River and Folsom Dam, are not suffering from the supply constraints afflicting customers reliant upon the federal Colorado River System and the California State Water Project.

KEY STATISTICS

2009 estimated population: 158,000

Number of water service connections, 2009: 44,147

Per capita income, City of Citrus Heights, 1999: \$20,744 (91.3% of State)

Median family income, City of Citrus Heights, 1999: \$51,207 (96.6% of State)

Operating ratio, fiscal 2009: 40.1%

Net take-down, fiscal 2009: 61.32%

Debt service coverage, current year, fiscal 2009: 3.33x

Unrestricted cash and investments, % of O&M, fiscal 2009: 199.3%

The last rating action with respect to the Sacramento Suburban Water District was on May 29, 2009, when a municipal finance scale underlying rating of A1 was assigned to District's Refunding Revenue Certificates of Participation, Series 2009A and B and the underlying ratings on the parity obligations were affirmed. That rating was subsequently recalibrated to Aa2 on April 16, 2010.

The principal methodology used in rating Sacramento Suburban Water District was Analytical Framework for Water and Sewer System Ratings rating methodology published August 31, 1999. Other methodologies and factors that may have been considered in the process of rating this issuer can also be found on Moody's website.

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