



Control Number: 55421



Item Number: 40

RECEIVED  
2023 FEB -1 PM 1:53  
PUBLIC UTILITY COMMISSION  
FILING CLERK

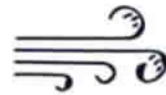
# Texas Advanced Nuclear Reactor Working Group

January 31, 2023

CLEARPATH

## ClearPath Mission and Vision

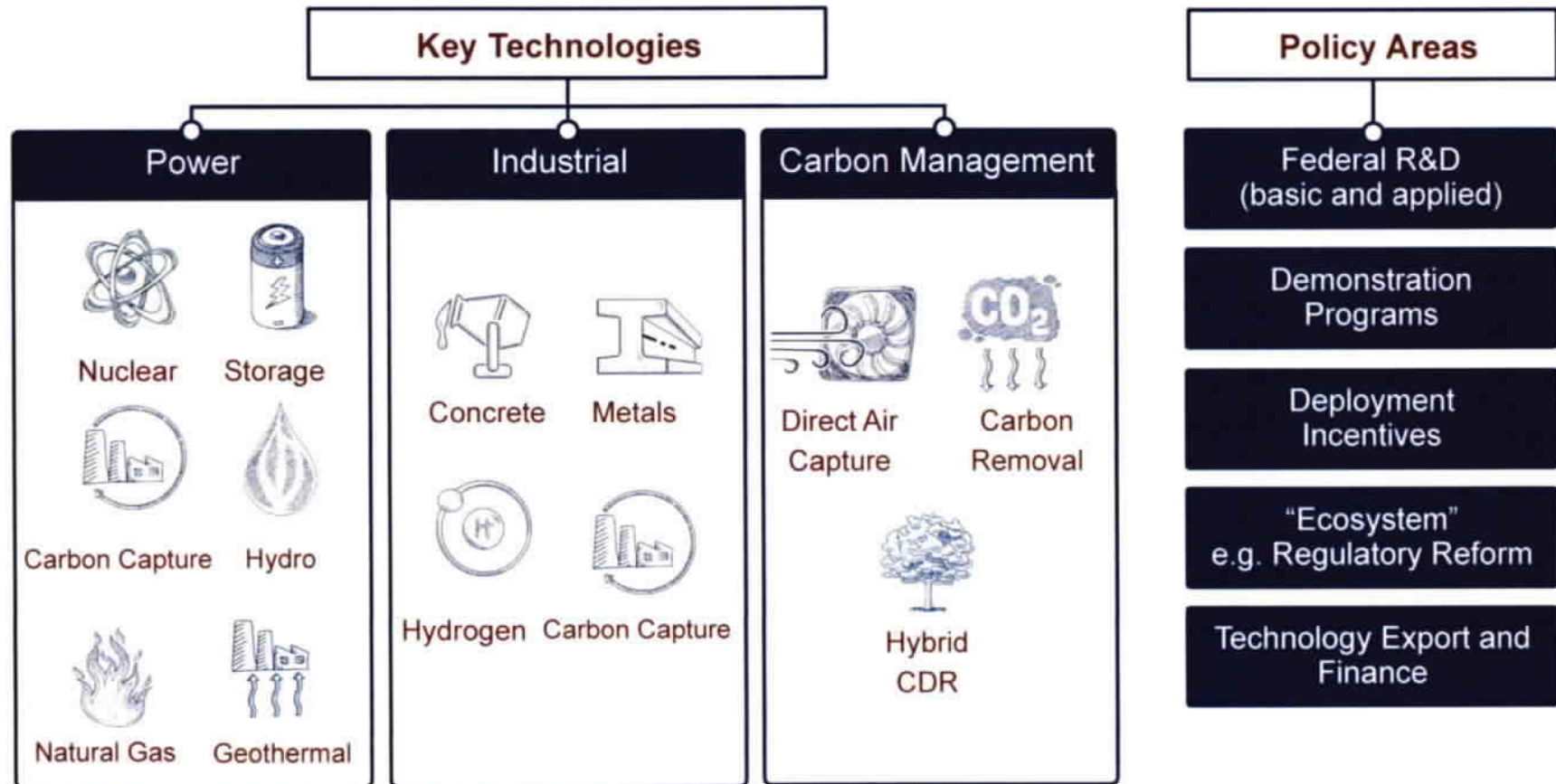
---



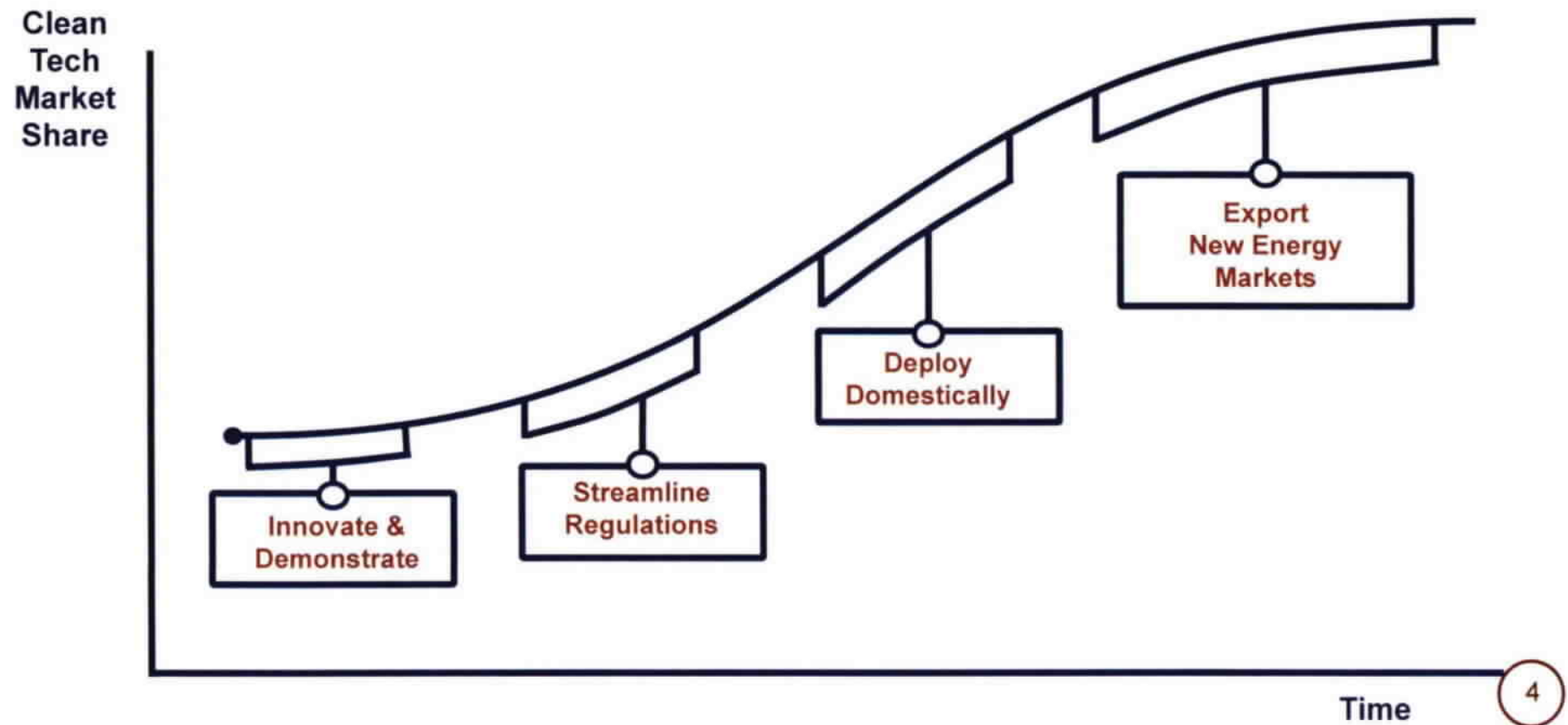
**Mission:** ClearPath's mission is to develop and advance policies that accelerate innovations to reduce and remove global energy emissions.

**Vision:** America leads the world in addressing climate change by developing innovative, market-competitive clean energy technologies.

## ClearPath Policy Pillars



## Policy can push energy technology up the “S-curve”



# Net Present Value (NPV) Model to Assess Options for Deployment

---

## Why NPV?

- Time value of money is important for long-lived assets
- Facilitates decision-making when comparing projects of similar sizes
- All models are wrong, some are useful

## Assumptions

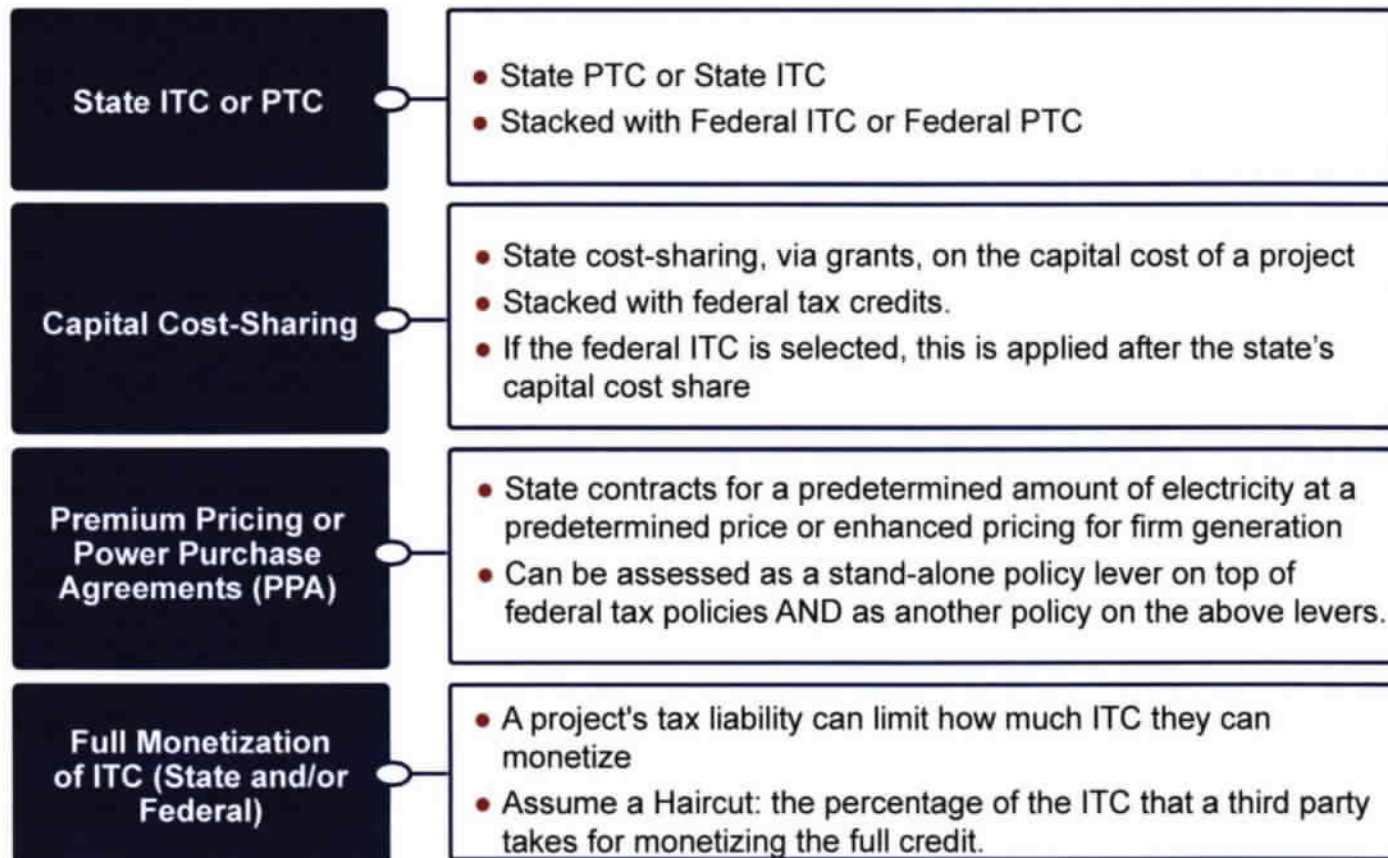
- First-of-a-kind capital costs of a generic project and technology
- Revenue based on historic ERCOT average annual prices and/or PPAs
- Analyzes whether NPV of revenue > all capital, O&M, financing costs

## Existing Federal Support

- 45Y - Clean Energy Production Tax Credit (ITC)
- 48E - Clean Energy Investment Tax Credit (PTC)
- Loan Program Office can offer loans or loan guarantees under 1703 or 1706

## Policy Options

---





## Policy Recommendations

### State ITC & Federal ITC

- Federal ITC has NPV 6-67% higher than PTC across all levels, NPV still negative
- State ITC likewise has bigger impact than State PTC with lower cost of intervention
- *Benefit:* Directly related to capital costs, which is the main cost driver for overruns
- *Downsides:* May need to be monetized if insufficient tax burden; not available until after startup

### Premium Pricing/PPA

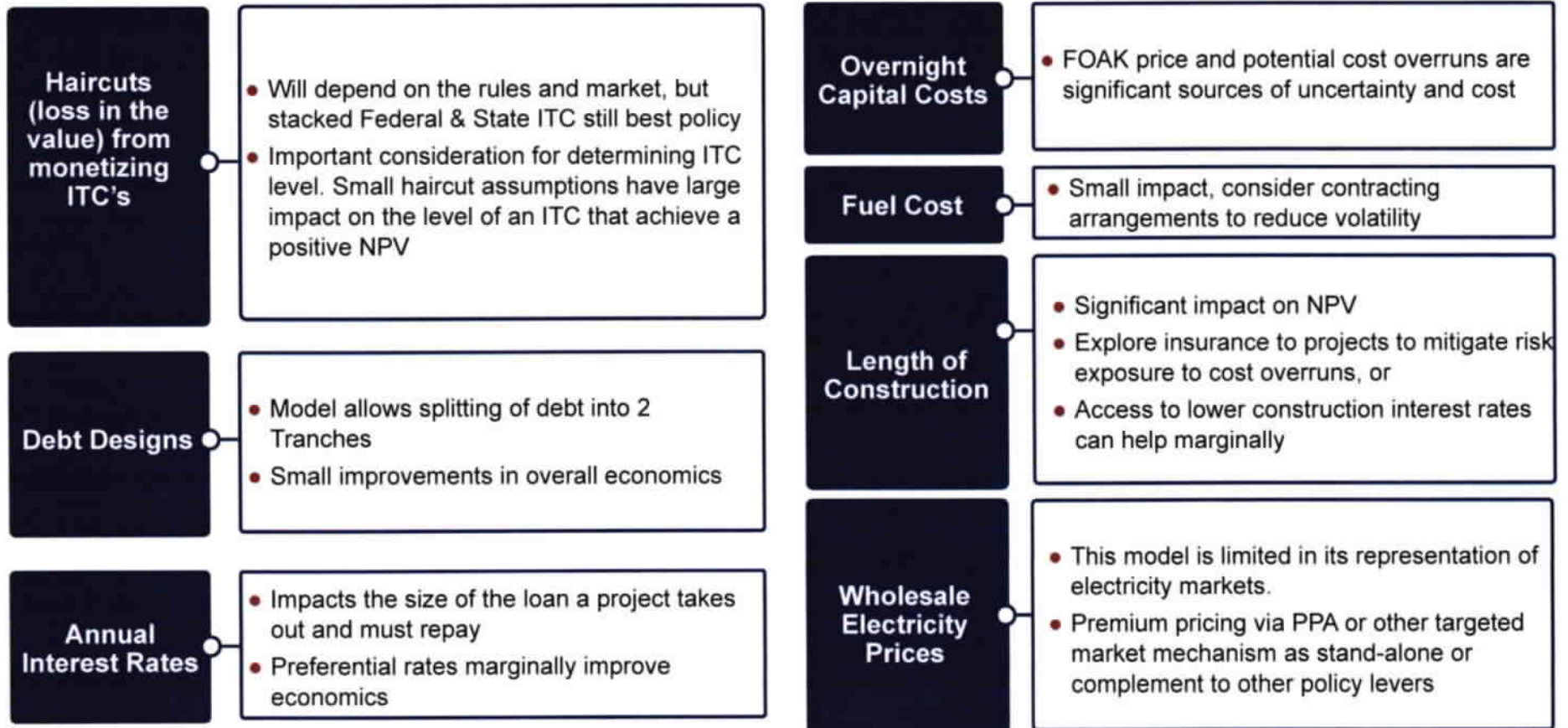
- Premium price needed for positive NPV **highly dependent** on market prices
- \$148.94/MWh is breakeven for NPV (over 2x hist. Avg \$/MWh), 20 yr contract for 50% of output
- *Benefit:* Higher guaranteed revenue, decreases volatility and risk
- *Downsides:* May require more than state policy, doesn't impact capital cost overruns.

### State Cost-Share

- \$1 million cost share had <1% improvement in NPV, still negative
- \$1 billion cost share had 36% improvement in NPV, still negative
- ~\$2.8 billion cost-share had positive, near 0 NPV
- *Benefits:* Early availability of funds to support project development; directly addresses main cost driver
- *Downsides:* Less efficient than State ITC in achieving a positive NPV



## Model Findings & Additional Considerations



## Using the Model: Input Dashboard

### Example Input Section

#### Input Categories

- Project Characteristics (Costs, Service Life, etc.)
- Revenue Inputs (Capacity Factor, Prices)
- Debt Assumptions (Interest rate, Tenor, Tranching)
- Federal Tax Incentives (ITC/PTC and adders)

Category of Input	Input Name	User Inputs are Colored Cells	Input Instructions	Additional Information
Project Characteristic Inputs	Project Capacity (MW)	600	Enter value greater than 1.	On the Nuclear Plant info sheet Cells C54:C62 there is information on the size of reactor scheduled to come online in the next decade
	Overnight Capital Cost \$/k.W	\$8,082	For a generic small modular reactor NREL ATB had overnight capital costs at 8,082 2022USD/k.W	Capital expenditures excluding construction period financing. The Nuclear Plant Info Sheet contains data from NREL as well as MIT on new nuclear costs
	Fixed Operation and Maintenance Expenses (\$/k.W-yr)	\$128	For a generic small modular reactor NREL ATB has Fixed O&M costs at 128 2022USD/k.W-yr	Annual expenditures to operate and maintain equipment that are not incurred on a per-unit-energy basis. The Nuclear Plant Info Sheet contains data from NREL as well as MIT on new nuclear costs
	Variable Operation and Maintenance Expenses (\$/MWh)	\$3	For a generic small modular reactor NREL ATB has Variable O&M costs at 3 2022USD/MWh	Operating and maintenance costs incurred on a per-unit-energy basis. The Nuclear Plant Info Sheet contains data from NREL, MIT, and NEI on these costs. For NEI look to cells I66:I69
	Fuel Costs (\$/MWh)	\$7	For a generic small modular reactor NREL ATB has Fuel costs at 7 2022USD/MWh	Additional historical data on fuel costs from NEI is in the Nuclear Plant Info sheet cells I66:I79
	Project Service Life (years)	60	Maximum input is 80 years	NRC license timeframe of 40 years. Industry assumption that the plants will get the 20 year license renewal once or twice.
	Construction Length (Years)	7	Select from list. Possible values range from 1 to 20, inclusive. The median construction time for U.S. nuclear power plants is about 7 years	About half of nuclear power plant in the U.S. took 5 to 10 years to reach grid connection. Longer construction timeframes increase construction financing costs while shorter timeframes decrease these costs.

## Using the Model: Input Dashboard

### User-input Scenario Assumptions

- ITC Monetization Haircut Assumption
- Optional State ITC or PTC, and values associated
- Capital Cost share in \$
- Premium PPA agreement details

### Color-Coded Scenario Inputs Section

Scenarios 2 & 4	ITC Haircut Assumption (%)	10%	Enter a value between 0-100%. This will be the percentage of an ITC that goes to a third party with the necessary tax liability and not the project developer.	A project's tax liability can limit how much of the ITC they can monetize. It is common practice for project developers to use a third parties tax liability to access the full value of the ITC with that third party taking some share. For example, a project may qualify for a 10% ITC but only be able to access 2% of the 10% with its tax liability. The developer goes to another entity that can access the other 8% and takes a "haircut" of 1% for itself. The project gets 9% while the third party gets 1%.
Scenario 3	State Tax Credit	State ITC	Select PTC or ITC from the List	This scenario enables the user to assess the impact of a state-level PTC or ITC on top of a federal PTC or ITC.
	ITC Value (%)	10%	Enter value 0-100%	For reference the federal ITC ranges from 6% to 50% depending on whether the prevailing wage and apprenticeship requirements are met and which adders are attained.
	PTC Value (\$/MWh)	\$5.00	Enter positive value	For reference the federal PTC ranges from \$5.5/MWh to \$33/MWh depending on whether the prevailing wage and apprenticeship requirements are met and which adders are attained.
Scenario 5	Capital Cost Share from Texas (\$)	\$1,000,000,000	Enter Value.	This scenario enables the user to assess the impact of a Capital Cost share between the project developer and the state of Texas. This cost share is applied before the ITC (federal or state) is applied.
	Percent of project overnight capital costs from Base covered by the state	15%	Output based on cost-share amount and the total project cost.	This value is generated but dividing the cost share amount and the total cost of the project prior to the cost-share being applied.
Scenario 6	Power Purchase Agreement (PPA)	All	Select from list.	No will not include a PPA in any scenario and scenario 6 will be empty. All will include a PPA in Scenarios 2-6. Scenario 6 only will include a PPA in that case only.
	Length of PPA (years)	15	Max 20 years	PPA lengths are typically 10 or 20 years.
	Share of Plant Capacity Covered by PPA	33%	Enter value from 0-100%	
	PPA Value (\$/MWh)	\$87.00	Enter Positive Value	add something that shows relation to the market price
	PPA Premium over Ercot Market Price	43%	This is an output showing the premium (+/- %) of the user-input PPA price and the user-input ERCOT Market Price.	

## Using the Model: Output Dashboard

---

### Output Metrics

- **Is the project profitable** – Does the net present value (NPV) of all revenues and Federal + State policy support exceed all capital, operating, and financing costs?
- **Impact of policy in each scenario** – How does the return on invested capital change across policy scenarios
- **Total Cost of Policy Intervention** – what is the total value of the avoided state-level taxes, cost-share, and price premium/PPA
- **Levelized Cost of Energy (LCOE)** – metric combines the primary technology cost and performance parameters. It is one useful metric for comparing a technology cost-competitiveness but is imperfect because it does not capture other operating characteristics or attributes that provide value to the electric system broadly.
- **Total Cost of Project** – broken out by CAPEX and OPEX
- **Total Revenue** – broken out by wholesale market revenue, PPA/premium price, and state-level production tax credits.

# Casey Kelly

---

**Senior Advisor - Research and Electricity**  
Kelly@clearpath.org