Table D-1
Comanche Peak Nuclear Power Plant Unit 1
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Period 5b Period-Dependent Costs (continued)																					
5b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	490	49	539	-	539	-	-	-	-	-	-	-	-	-
5b.4.6	ISFSI Operating Costs	-	-	-	-	-	-	133	20	153	-	153	-	-	-	-	-	-	-	-	-
5b.4.7	Security Staff Cost	-	-	-	-	-	-	3,906	585	4,489	(0)	2,882	1,607	-	-	-	-	-	-	-	87,258
5b.4.8	DOC Staff Cost	-	-	-	-	-	-	11,197	1,680	12,877	-	-	12,877	-	-	-	-	-	-	-	110,240
5b.4.9	Utility Staff Cost	-	-	-	-	-	-	6,013	902	6,914	0	1,459	5,455	-	-	-	-	-	-	-	70,200
5b.4	Subtotal Period 5b Period-Dependent Costs	-	7,880	-	-	-	-	23,639	4,632	36,151	0	5,033	31,119	-	-	-	-	-	-	-	267,798
5b.0	TOTAL PERIOD 5b COST	-	15,863	-	-	-	-	21,715	5,996	46,604	270	5,952	40,381	-	-	-	-	-	-	66,106	289,358
PERIOD 5c - Fuel Storage Operations/Shipping																					
Period 5c Collateral Costs																					
5c.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	958	144	1,102	-	1,102	-	-	-	-	-	-	-	-	-
5c.3	Subtotal Period 5c Collateral Costs	-	-	-	-	-	-	958	144	1,102	-	1,102	-	-	-	-	-	-	-	-	-
Period 5c Period-Dependent Costs																					
5c.4.1	Insurance	-	-	-	-	-	-	743	74	817	-	817	-	-	-	-	-	-	-	-	-
5c.4.2	Property taxes	-	-	-	-	-	-	1,286	129	1,415	-	1,415	-	-	-	-	-	-	-	-	-
5c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	701	70	771	-	771	-	-	-	-	-	-	-	-	-
5c.4.5	ISFSI Operating Costs	-	-	-	-	-	-	190	29	219	-	219	-	-	-	-	-	-	-	-	-
5c.4.6	Security Staff Cost	-	-	-	-	-	-	3,582	537	4,119	-	4,119	-	-	-	-	-	-	-	-	77,340
5c.4.7	Utility Staff Cost	-	-	-	-	-	-	1,814	272	2,087	-	2,087	-	-	-	-	-	-	-	-	20,079
5c.4	Subtotal Period 5c Period-Dependent Costs	-	-	-	-	-	-	8,316	1,111	9,427	-	9,427	-	-	-	-	-	-	-	-	97,419
5c.0	TOTAL PERIOD 5c COST	-	-	-	-	-	-	9,274	1,255	10,529	-	10,529	-	-	-	-	-	-	-	-	97,419
PERIOD 5d - GTCC shipping																					
Period 5d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
5d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,000	-	-	10,532	-	1,830	13,362	13,362	-	-	-	-	-	-	2,061	401,974	-	-
5d.1.1	Totals	-	-	1,000	-	-	10,532	-	1,830	13,362	13,362	-	-	-	-	-	-	2,061	401,974	-	-
5d.1	Subtotal Period 5d Activity Costs	-	-	1,000	-	-	10,532	-	1,830	13,362	13,362	-	-	-	-	-	-	2,061	401,974	-	-
Period 5d Period-Dependent Costs																					
5d.4.1	Insurance	-	-	-	-	-	-	10	1	11	11	-	-	-	-	-	-	-	-	-	-
5d.4.2	Property taxes	-	-	-	-	-	-	17	2	19	19	-	-	-	-	-	-	-	-	-	-
5d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	7	1	8	-	8	-	-	-	-	-	-	-	-	-
5d.4.5	ISFSI Operating Costs	-	-	-	-	-	-	3	0	3	-	3	-	-	-	-	-	-	-	-	-
5d.4.6	Security Staff Cost	-	-	-	-	-	-	48	7	55	55	-	-	-	-	-	-	-	-	-	1,037
5d.4.7	Utility Staff Cost	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	269
5d.4	Subtotal Period 5d Period-Dependent Costs	-	-	-	-	-	-	109	15	124	113	11	-	-	-	-	-	-	-	-	1,306
5d.0	TOTAL PERIOD 5d COST	-	-	1,000	-	-	10,532	109	1,844	13,485	13,475	11	-	-	-	-	-	2,061	401,974	-	1,306
PERIOD 5e - ISFSI Decontamination																					
Period 5e Additional Costs																					
5e.2.1	License Termination ISFSI	-	475	305	506	-	2,229	2,471	1,746	8,732	8,732	-	-	-	20,829	-	-	-	2,015,971	14,285	1,298
5e.2	Subtotal Period 5e Additional Costs	-	475	305	506	-	2,229	2,471	1,746	8,732	8,732	-	-	-	20,829	-	-	-	2,015,971	14,285	1,298
Period 5e Period-Dependent Costs																					
5e.4.1	Insurance	-	-	-	-	-	-	61	15	77	77	-	-	-	-	-	-	-	-	-	-
5e.4.2	Property taxes	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5e.4.3	Plant energy budget	-	-	-	-	-	-	8	2	10	10	-	-	-	-	-	-	-	-	-	-
5e.4.4	Security Staff Cost	-	-	-	-	-	-	117	29	146	146	-	-	-	-	-	-	-	-	-	2,479
5e.4.5	Utility Staff Cost	-	-	-	-	-	-	172	43	215	215	-	-	-	-	-	-	-	-	-	1,881
5e.4	Subtotal Period 5e Period-Dependent Costs	-	-	-	-	-	-	358	89	447	447	-	-	-	-	-	-	-	-	-	4,359
5e.0	TOTAL PERIOD 5e COST	-	475	305	506	-	2,229	2,829	1,836	9,179	9,179	-	-	-	20,829	-	-	-	2,015,971	14,285	5,656
PERIOD 5f - ISFSI Site Restoration																					
Period 5f Additional Costs																					
5f.2.1	Demolition and Site Restoration ISFSI	-	6,261	-	-	-	-	35	944	7,240	-	-	7,240	-	-	-	-	-	-	51,188	80

Table D-1
Comanche Peak Nuclear Power Plant Unit 1
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
5f.2	Subtotal Period 5f Additional Costs	-	6,281	-	-	-	-	35	944	7,240	-	-	7,240	-	-	-	-	-	-	51,188	80
Period 5f Collateral Costs																					
5f.3.1	Small tool allowance	-	73	-	-	-	-	-	11	84	-	-	84	-	-	-	-	-	-	-	-
5f.3	Subtotal Period 5f Collateral Costs	-	73	-	-	-	-	-	11	84	-	-	84	-	-	-	-	-	-	-	-
Period 5f Period-Dependent Costs																					
5f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5f.4.2	Property Taxes	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5f.4.3	Plant energy budget	-	-	-	-	-	-	4	1	5	-	-	5	-	-	-	-	-	-	-	-
5f.4.4	Security Staff Cost	-	-	-	-	-	-	58	9	67	-	-	67	-	-	-	-	-	-	-	1,239
5f.4.5	Utility Staff Cost	-	-	-	-	-	-	71	11	82	-	-	82	-	-	-	-	-	-	-	769
5f.4	Subtotal Period 5f Period-Dependent Costs	-	-	-	-	-	-	133	20	153	-	-	153	-	-	-	-	-	-	-	2,009
5f.0	TOTAL PERIOD 5f COST	-	6,354	-	-	-	-	168	975	7,477	-	-	7,477	-	-	-	-	-	-	51,188	2,089
PERIOD 5 TOTALS		-	22,672	1,305	506	-	13,761	37,126	11,906	87,275	22,925	16,492	47,859	-	20,329	-	-	2,061	2,417,945	131,880	375,824
TOTAL COST TO DECOMMISSION		8,380	96,167	25,668	10,781	-	70,171	828,079	176,255	1,215,500	872,769	286,808	55,923	-	121,703	501	337	2,061	27,696,550	861,476	7,415,772

TOTAL COST TO DECOMMISSION WITH 16.96% CONTINGENCY:	**$1,215,500**	**thousands of 2024 dollars**
TOTAL NRC LICENSE TERMINATION COST IS 71.8% OR:	**$872,769**	**thousands of 2024 dollars**
SPENT FUEL MANAGEMENT COST IS 23.6% OR:	**$286,808**	**thousands of 2024 dollars**
NON-NUCLEAR DEMOLITION COST IS 4.6% OR:	**$55,923**	**thousands of 2024 dollars**
TOTAL LOW-LEVEL RADIOACTIVE WASTE VOLUME BURIED (EXCLUDING GTCC):	**422,540**	**Cubic Feet**
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	**2,061**	**Cubic Feet**
TOTAL SCRAP METAL REMOVED:	**59,580**	**Tons**
TOTAL CRAFT LABOR REQUIREMENTS:	**861,476**	**Man-hours**

End Notes:
n/a - indicates that this activity not charged as decommissioning expense
a - indicates that this activity performed by decommissioning staff
0 - indicates that this value is less than 0.5 but is non-zero
A cell containing " - " indicates a zero value

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt, Lbs.	Craft Manhours	Utility and Contractor Manhours
PERIOD 1a - Shutdown through Transition																					
Period 1a Direct Decommissioning Activities																					
1a.1.1	SAFSTOR site characterization survey	-	-	-	-	-	-	421	126	547	547	-	-	-	-	-	-	-	-	-	-
1a.1.2	Prepare preliminary decommissioning cost	-	-	-	-	-	-	84	13	96	96	-	-	-	-	-	-	-	-	-	556
1a.1.3	Notification of Cessation of Operations									a											
1a.1.4	Remove fuel & source material									n/a											
1a.1.5	Notification of Permanent Defueling									a											
1a.1.6	Deactivate plant systems & process waste									a											
1a.1.7	Prepare and submit PSDAR	-	-	-	-	-	-	129	19	148	148	-	-	-	-	-	-	-	-	-	856
1a.1.8	Review plant dwgs & spces.	-	-	-	-	-	-	84	13	96	96	-	-	-	-	-	-	-	-	-	556
1a.1.9	Perform detailed rad survey									a											
1a.1.10	Estimate by-product inventory	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428
1a.1.11	End product description	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428
1a.1.12	Detailed by-product inventory	-	-	-	-	-	-	97	15	111	111	-	-	-	-	-	-	-	-	-	642
1a.1.13	Define major work sequence	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428
1a.1.14	Perform SER and EA	-	-	-	-	-	-	200	30	230	230	-	-	-	-	-	-	-	-	-	1,327
1a.1.15	Perform Site-Specific Cost Study	-	-	-	-	-	-	323	48	371	371	-	-	-	-	-	-	-	-	-	2,140
Activity Specifications																					
1a.1.16.1	Prepare plant and facilities for SAFSTOR	-	-	-	-	-	-	318	48	365	365	-	-	-	-	-	-	-	-	-	2,106
1a.1.16.2	Plant systems	-	-	-	-	-	-	269	40	309	309	-	-	-	-	-	-	-	-	-	1,783
1a.1.16.3	Plant structures and buildings	-	-	-	-	-	-	201	30	232	232	-	-	-	-	-	-	-	-	-	1,335
1a.1.16.4	Waste management	-	-	-	-	-	-	129	19	148	148	-	-	-	-	-	-	-	-	-	856
1a.1.16.5	Facility and site dormancy	-	-	-	-	-	-	129	19	148	148	-	-	-	-	-	-	-	-	-	856
1a.1.16	Total	-	-	-	-	-	-	1,046	157	1,203	1,203	-	-	-	-	-	-	-	-	-	6,936
Detailed Work Procedures																					
1a.1.17.1	Plant systems	-	-	-	-	-	-	76	11	88	88	-	-	-	-	-	-	-	-	-	506
1a.1.17.2	Facility closeout & dormancy	-	-	-	-	-	-	77	12	89	89	-	-	-	-	-	-	-	-	-	514
1a.1.17	Total	-	-	-	-	-	-	154	23	177	177	-	-	-	-	-	-	-	-	-	1,020
1a.1.18	Procure vacuum drying system	-	-	-	-	-	-	6	1	7	7	-	-	-	-	-	-	-	-	-	43
1a.1.19	Drain/de-energize non-cont. systems									a											
1a.1.20	Drain & dry NSSS									a											
1a.1.21	Drain/de-energize contaminated systems									a											
1a.1.22	Decon/secure contaminated systems									a											
1a.1	Subtotal Period 1a Activity Costs	-	-	-	-	-	-	2,737	474	3,211	3,211	-	-	-	-	-	-	-	-	-	15,361
Period 1a Collateral Costs																					
1a.3	Subtotal Period 1a Collateral Costs	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Period 1a Period-Dependent Costs																					
1a.4.1	Insurance	-	-	-	-	-	-	2,446	245	2,691	2,691	-	-	-	-	-	-	-	-	-	-
1a.4.2	Property taxes	-	-	-	-	-	-	489	49	538	538	-	-	-	-	-	-	-	-	-	-
1a.4.3	Health physics supplies	-	962	-	-	-	-	240	1,202	1,202	-	-	-	-	-	-	-	-	-	-	-
1a.4.4	Heavy equipment rental	-	899	-	-	-	-	-	135	1,033	1,033	-	-	-	-	-	-	-	-	-	-
1a.4.5	Disposal of DAW generated	-	-	13	6	-	13	-	5	37	37	-	-	-	610	-	-	-	12,190	20	-
1a.4.6	Plant energy budget	-	-	-	-	-	-	2,419	363	2,782	2,782	-	-	-	-	-	-	-	-	-	-
1a.4.7	NRC Fees	-	-	-	-	-	-	728	73	801	801	-	-	-	-	-	-	-	-	-	-
1a.4.8	Emergency Planning Fees	-	-	-	-	-	-	499	50	549	-	549	-	-	-	-	-	-	-	-	-
1a.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	514	77	591	-	591	-	-	-	-	-	-	-	-	-
1a.4.10	ISFSI Operating Costs	-	-	-	-	-	-	66	10	76	-	76	-	-	-	-	-	-	-	-	-
1a.4.11	Security Staff Cost	-	-	-	-	-	-	5,930	890	6,820	6,820	-	-	-	-	-	-	-	-	-	132,116
1a.4.12	Utility Staff Cost	-	-	-	-	-	-	34,338	5,151	39,489	39,489	-	-	-	-	-	-	-	-	-	422,240
1a.4	Subtotal Period 1a Period-Dependent Costs	-	1,861	13	6	-	13	47,431	7,287	56,610	55,894	1,217	-	-	610	-	-	-	12,190	20	555,356
1a.0	TOTAL PERIOD 1a COST	-	1,861	13	6	-	13	50,168	7,761	59,821	59,104	1,217	-	-	610	-	-	-	12,190	20	570,717
PERIOD 1b - SAFSTOR Limited DECON Activities																					
Period 1b Direct Decommissioning Activities																					
Decontamination of Site Buildings																					
1b.1.1.1	Reactor	1,269	-	-	-	-	-	-	635	1,904	1,904	-	-	-	-	-	-	-	-	20,861	-
1b.1.1.2	Auxiliary	798	-	-	-	-	-	-	399	1,197	1,197	-	-	-	-	-	-	-	-	20,089	-
1b.1.1.3	Radwaste Warehouse	270	-	-	-	-	-	-	135	404	404	-	-	-	-	-	-	-	-	6,787	-
1b.1.1.4	Safeguard	157	-	-	-	-	-	-	79	236	236	-	-	-	-	-	-	-	-	3,960	-

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
1b.1.1	Totals	2,494	-	-	-	-	-	-	1,247	3,741	3,741	-	-	-	-	-	-	-	-	61,697	-
1b.1	Subtotal Period 1b Activity Costs	2,494	-	-	-	-	-	-	1,247	3,741	3,741	-	-	-	-	-	-	-	-	61,697	-
Period 1b Additional Costs																					
1b.2.1	Spent Fuel Pool Isolation	-	-	-	-	-	-	10,037	1,505	11,542	11,542	-	-	-	-	-	-	-	-	-	-
1b.2	Subtotal Period 1b Additional Costs	-	-	-	-	-	-	10,037	1,505	11,542	11,542	-	-	-	-	-	-	-	-	-	-
Period 1b Collateral Costs																					
1b.3.1	Decon equipment	1,253	-	-	-	-	-	-	188	1,441	1,441	-	-	-	-	-	-	-	-	-	-
1b.3.2	Process decommissioning water waste	206	-	140	197	-	155	-	186	885	885	-	-	-	1,180	-	-	-	70,800	230	-
1b.3.3	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1b.3.4	Small tool allowance	-	89	-	-	-	-	-	6	44	44	-	-	-	-	-	-	-	-	-	-
1b.3	Subtotal Period 1b Collateral Costs	1,459	89	140	197	-	155	-	379	2,370	2,370	-	-	-	1,180	-	-	-	70,800	230	-
Period 1b Period-Dependent Costs																					
1b.4.1	Decon supplies	2,026	-	-	-	-	-	-	507	2,533	2,533	-	-	-	-	-	-	-	-	-	-
1b.4.2	Insurance	-	-	-	-	-	-	610	61	671	671	-	-	-	-	-	-	-	-	-	-
1b.4.3	Property taxes	-	-	-	-	-	-	112	11	123	123	-	-	-	-	-	-	-	-	-	-
1b.4.4	Health physics supplies	-	792	-	-	-	-	-	198	990	990	-	-	-	-	-	-	-	-	-	-
1b.4.5	Heavy equipment rental	-	224	-	-	-	-	-	34	258	258	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	19	9	-	20	-	8	55	55	-	-	-	902	-	-	-	18,031	29	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	603	90	694	694	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	146	15	161	161	-	-	-	-	-	-	-	-	-	-
1b.4.9	Emergency Planning Fees	-	-	-	-	-	-	124	12	137	-	137	-	-	-	-	-	-	-	-	-
1b.4.10	Spent Fuel Pool O&M	-	-	-	-	-	-	128	19	147	-	147	-	-	-	-	-	-	-	-	-
1b.4.11	ISFSI Operating Costs	-	-	-	-	-	-	17	2	19	-	19	-	-	-	-	-	-	-	-	-
1b.4.12	Security Staff Cost	-	-	-	-	-	-	1,478	222	1,700	1,700	-	-	-	-	-	-	-	-	-	33,188
1b.4.13	Utility Staff Cost	-	-	-	-	-	-	8,561	1,284	9,845	9,845	-	-	-	-	-	-	-	-	-	105,271
1b.4	Subtotal Period 1b Period-Dependent Costs	2,026	1,016	19	9	-	20	11,780	2,464	17,333	17,029	303	-	-	902	-	-	-	18,031	29	138,459
1b.0	TOTAL PERIOD 1b COST	5,980	1,054	159	206	-	175	21,817	5,596	34,986	34,683	303	-	-	2,082	-	-	-	88,832	61,956	138,459
PERIOD 1c - Preparations for SAFSTOR Dormancy																					
Period 1c Direct Decommissioning Activities																					
1c.1.1	Prepare support equipment for storage	-	488	-	-	-	-	-	73	561	561	-	-	-	-	-	-	-	-	3,000	-
1c.1.2	Install containment pressure equal. lines	-	29	-	-	-	-	-	4	34	34	-	-	-	-	-	-	-	-	700	-
1c.1.3	Interim survey prior to dormancy	-	-	-	-	-	-	733	220	953	953	-	-	-	-	-	-	-	-	12,593	-
1c.1.4	Secure building accesses									a											
1c.1.5	Prepare & submit interim report	-	-	-	-	-	-	38	6	43	43	-	-	-	-	-	-	-	-	-	250
1c.1	Subtotal Period 1c Activity Costs	-	517	-	-	-	-	771	303	1,591	1,591	-	-	-	-	-	-	-	-	16,293	250
Period 1c Collateral Costs																					
1c.2.1	Process decommissioning water waste	228	-	155	218	-	171	-	205	976	976	-	-	-	1,303	-	-	-	78,201	254	-
1c.2.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1c.2.3	Small tool allowance	-	3	-	-	-	-	-	0	3	3	-	-	-	-	-	-	-	-	-	-
1c.2	Subtotal Period 1c Collateral Costs	228	3	155	218	-	171	-	205	980	980	-	-	-	1,303	-	-	-	78,201	254	-
Period 1c Period-Dependent Costs																					
1c.4.1	Insurance	-	-	-	-	-	-	610	61	671	671	-	-	-	-	-	-	-	-	-	-
1c.4.2	Property taxes	-	-	-	-	-	-	112	11	123	123	-	-	-	-	-	-	-	-	-	-
1c.4.3	Health physics supplies	-	387	-	-	-	-	-	97	484	484	-	-	-	-	-	-	-	-	-	-
1c.4.4	Heavy equipment rental	-	224	-	-	-	-	-	34	258	258	-	-	-	-	-	-	-	-	-	-
1c.4.5	Disposal of DAW generated	-	-	3	1	-	3	-	1	9	9	-	-	-	152	-	-	-	3,039	5	-
1c.4.6	Plant energy budget	-	-	-	-	-	-	603	90	694	694	-	-	-	-	-	-	-	-	-	-
1c.4.7	NRC Fees	-	-	-	-	-	-	146	15	161	161	-	-	-	-	-	-	-	-	-	-
1c.4.8	Emergency Planning Fees	-	-	-	-	-	-	124	12	137	-	137	-	-	-	-	-	-	-	-	-
1c.4.9	Spent Fuel Pool O&M	-	-	-	-	-	-	128	19	147	-	147	-	-	-	-	-	-	-	-	-
1c.4.10	ISFSI Operating Costs	-	-	-	-	-	-	17	2	19	-	19	-	-	-	-	-	-	-	-	-
1c.4.11	Security Staff Cost	-	-	-	-	-	-	1,478	222	1,700	1,700	-	-	-	-	-	-	-	-	-	33,188
1c.4.12	Utility Staff Cost	-	-	-	-	-	-	8,561	1,284	9,845	9,845	-	-	-	-	-	-	-	-	-	105,271
1c.4	Subtotal Period 1c Period-Dependent Costs	-	611	3	1	-	3	11,780	1,849	14,249	13,945	303	-	-	152	-	-	-	3,039	5	138,459
1c.0	TOTAL PERIOD 1c COST	228	1,131	158	219	-	175	12,551	2,357	16,819	16,515	303	-	-	1,455	-	-	-	81,240	16,552	138,708
PERIOD 1 TOTALS		6,207	1,045	330	131	-	363	84,536	15,714	111,626	109,803	1,823	-	-	4,146	-	-	-	192,262	78,528	847,884

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
PERIOD 2a - SAFSTOR Dormancy with Wet Spent Fuel Storage																					
Period 2a Direct Decommissioning Activities																					
2a.1.1	Quarterly Inspection									a											
2a.1.2	Semi-annual environmental survey									a											
2a.1.3	Prepare reports									a											
2a.1.4	Bituminous roof replacement	-	-	-	-	-	-	1,522	228	1,750	1,750	-	-	-	-	-	-	-	-	-	-
2a.1.5	Maintenance supplies	-	-	-	-	-	-	656	164	820	820	-	-	-	-	-	-	-	-	-	-
2a.1	Subtotal Period 2a Activity Costs	-	-	-	-	-	-	2,178	392	2,571	2,571	-	-	-	-	-	-	-	-	-	-
Period 2a Additional Costs																					
2a.2.1	Asbestos Abatement	-	-	-	-	-	-	1,000	150	1,150	-	-	1,150	-	-	-	-	-	-	-	-
2a.2.2	Mixed Waste Disposal	-	-	-	-	-	-	50	8	58	58	-	-	-	-	-	-	-	-	-	-
2a.2	Subtotal Period 2a Additional Costs	-	-	-	-	-	-	1,050	158	1,208	58	-	1,150	-	-	-	-	-	-	-	-
Period 2a Collateral Costs																					
2a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	86,197	12,930	99,126	-	99,126	-	-	-	-	-	-	-	-	-
2a.3.2	Severance	-	-	-	-	-	-	9,588	1,438	11,027	11,027	-	-	-	-	-	-	-	-	-	-
2a.3	Subtotal Period 2a Collateral Costs	-	-	-	-	-	-	95,785	14,368	110,153	11,027	99,126	-	-	-	-	-	-	-	-	-
Period 2a Period-Dependent Costs																					
2a.4.1	Insurance	-	-	-	-	-	-	2,078	208	2,285	2,285	-	-	-	-	-	-	-	-	-	-
2a.4.2	Property taxes	-	-	-	-	-	-	1,799	180	1,979	1,979	-	-	-	-	-	-	-	-	-	-
2a.4.3	Health physics supplies	-	1,445	-	-	-	-	-	361	1,807	1,807	-	-	-	-	-	-	-	-	-	-
2a.4.4	Disposal of DAW generated	-	-	17	8	-	18	-	8	51	51	-	-	-	843	-	-	-	16,864	28	-
2a.4.5	Plant energy budget	-	-	-	-	-	-	1,925	290	2,226	2,226	-	-	-	-	-	-	-	-	-	-
2a.4.6	NRC Fees	-	-	-	-	-	-	1,452	145	1,597	1,597	-	-	-	-	-	-	-	-	-	-
2a.4.7	Emergency Planning Fees	-	-	-	-	-	-	688	69	757	-	757	-	-	-	-	-	-	-	-	-
2a.4.8	Spent Fuel Pool O&M	-	-	-	-	-	-	2,057	309	2,366	-	2,366	-	-	-	-	-	-	-	-	-
2a.4.9	ISFSI Operating Costs	-	-	-	-	-	-	266	40	306	-	306	-	-	-	-	-	-	-	-	-
2a.4.10	Security Staff Cost	-	-	-	-	-	-	23,731	3,558	27,289	21,523	5,766	-	-	-	-	-	-	-	-	532,465
2a.4.11	Utility Staff Cost	-	-	-	-	-	-	16,959	2,541	19,502	15,836	3,666	-	-	-	-	-	-	-	-	195,520
2a.4	Subtotal Period 2a Period-Dependent Costs	-	1,445	17	8	-	18	50,954	7,711	60,154	47,303	12,851	-	-	843	-	-	-	16,864	28	727,985
2a.0	TOTAL PERIOD 2a COST	-	1,445	17	8	-	18	149,968	22,629	174,086	60,958	111,977	1,150	-	843	-	-	-	16,864	28	727,985
PERIOD 2b - SAFSTOR Dormancy with Dry Spent Fuel Storage																					
Period 2b Direct Decommissioning Activities																					
2b.1.1	Quarterly Inspection									a											
2b.1.2	Semi-annual environmental survey									a											
2b.1.3	Prepare reports									a											
2b.1.4	Bituminous roof replacement	-	-	-	-	-	-	17,325	2,600	19,925	19,925	-	-	-	-	-	-	-	-	-	-
2b.1.5	Maintenance supplies	-	-	-	-	-	-	7,473	1,868	9,342	9,342	-	-	-	-	-	-	-	-	-	-
2b.1	Subtotal Period 2b Activity Costs	-	-	-	-	-	-	24,808	4,469	29,277	29,277	-	-	-	-	-	-	-	-	-	-
Period 2b Collateral Costs																					
2b.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	18,045	2,707	20,752	-	20,752	-	-	-	-	-	-	-	-	-
2b.3.2	Severance	-	-	-	-	-	-	1,255	188	1,444	1,444	-	-	-	-	-	-	-	-	-	-
2b.3	Subtotal Period 2b Collateral Costs	-	-	-	-	-	-	19,300	2,895	22,196	1,444	20,752	-	-	-	-	-	-	-	-	-
Period 2b Period-Dependent Costs																					
2b.4.1	Insurance	-	-	-	-	-	-	22,662	2,366	26,028	26,028	-	-	-	-	-	-	-	-	-	-
2b.4.2	Property taxes	-	-	-	-	-	-	20,488	2,049	22,537	22,537	-	-	-	-	-	-	-	-	-	-
2b.4.3	Health physics supplies	-	8,101	-	-	-	-	-	2,025	10,126	10,126	-	-	-	-	-	-	-	-	-	-
2b.4.4	Disposal of DAW generated	-	-	97	44	-	102	-	42	286	286	-	-	-	4,700	-	-	-	93,991	153	-
2b.4.5	Plant energy budget	-	-	-	-	-	-	11,020	1,653	12,673	12,673	-	-	-	-	-	-	-	-	-	-
2b.4.6	NRC Fees	-	-	-	-	-	-	16,247	1,625	17,871	17,871	-	-	-	-	-	-	-	-	-	-
2b.4.7	ISFSI Operating Costs	-	-	-	-	-	-	3,023	454	3,482	-	3,482	-	-	-	-	-	-	-	-	-
2b.4.8	Security Staff Cost	-	-	-	-	-	-	88,904	13,336	102,239	36,602	65,638	-	-	-	-	-	-	-	-	1,989,839
2b.4.9	Utility Staff Cost	-	-	-	-	-	-	78,622	11,793	90,416	57,414	33,002	-	-	-	-	-	-	-	-	936,935
2b.4	Subtotal Period 2b Period-Dependent Costs	-	8,101	97	44	-	102	241,971	35,343	285,658	183,536	102,122	-	-	4,700	-	-	-	93,991	153	2,926,774
2b.0	TOTAL PERIOD 2b COST	-	8,101	97	44	-	102	286,079	42,707	337,130	214,257	122,873	-	-	4,700	-	-	-	93,991	153	2,926,774
PERIOD 2 TOTALS		-	9,546	115	52	-	121	436,046	65,335	511,216	275,215	234,851	1,150	-	5,543	-	-	-	110,856	181	3,654,759

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt, Lbs.	Craft Manhours	Utility and Contractor Manhours
PERIOD 3a - Reactivate Site Following SAFSTOR Dormancy																					
Period 3a Direct Decommissioning Activities																					
3a.1.1	Prepare preliminary decommissioning cost	-	-	-	-	-	-	84	13	96	96	-	-	-	-	-	-	-	-	-	556
3a.1.2	Review plant dwgs & spces.	-	-	-	-	-	-	297	45	341	341	-	-	-	-	-	-	-	-	-	1,969
3a.1.3	Perform detailed rad survey									a											
3a.1.4	End product description	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428
3a.1.5	Detailed by-product inventory	-	-	-	-	-	-	84	13	96	96	-	-	-	-	-	-	-	-	-	556
3a.1.6	Define major work sequence	-	-	-	-	-	-	484	73	557	557	-	-	-	-	-	-	-	-	-	3,210
3a.1.7	Perform SER and EA	-	-	-	-	-	-	200	30	230	230	-	-	-	-	-	-	-	-	-	1,327
3a.1.8	Prepare/submit Defueled Technical Specifications	-	-	-	-	-	-	484	73	557	557	-	-	-	-	-	-	-	-	-	3,210
3a.1.9	Perform Site-Specific Cost Study	-	-	-	-	-	-	823	48	871	871	-	-	-	-	-	-	-	-	-	2,140
3a.1.10	Prepare/submit Irradiated Fuel Management Plan	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428
Activity Specifications																					
3a.1.11.1	Re-activate plant & temporary facilities	-	-	-	-	-	-	476	71	547	492	-	55	-	-	-	-	-	-	-	3,154
3a.1.11.2	Plant systems	-	-	-	-	-	-	269	40	309	278	-	31	-	-	-	-	-	-	-	1,783
3a.1.11.3	Reactor internals	-	-	-	-	-	-	458	69	527	527	-	-	-	-	-	-	-	-	-	3,039
3a.1.11.4	Reactor vessel	-	-	-	-	-	-	419	63	482	482	-	-	-	-	-	-	-	-	-	2,782
3a.1.11.5	Biological shield	-	-	-	-	-	-	32	5	37	37	-	-	-	-	-	-	-	-	-	214
3a.1.11.6	Steam generators	-	-	-	-	-	-	201	30	232	232	-	-	-	-	-	-	-	-	-	1,335
3a.1.11.7	Reinforced concrete	-	-	-	-	-	-	103	15	119	59	-	59	-	-	-	-	-	-	-	685
3a.1.11.8	Main Turbine	-	-	-	-	-	-	26	4	30	-	-	30	-	-	-	-	-	-	-	171
3a.1.11.9	Main Condensors	-	-	-	-	-	-	26	4	30	-	-	30	-	-	-	-	-	-	-	171
3a.1.11.10	Plant structures & buildings	-	-	-	-	-	-	201	30	232	116	-	116	-	-	-	-	-	-	-	1,335
3a.1.11.11	Waste management	-	-	-	-	-	-	297	45	341	341	-	-	-	-	-	-	-	-	-	1,969
3a.1.11.12	Facility & site closeout	-	-	-	-	-	-	58	9	67	33	-	33	-	-	-	-	-	-	-	385
3a.1.11	Total	-	-	-	-	-	-	2,567	385	2,952	2,598	-	354	-	-	-	-	-	-	-	17,024
Planning & Site Preparations																					
3a.1.12	Prepare dismantling sequence	-	-	-	-	-	-	155	23	178	178	-	-	-	-	-	-	-	-	-	1,027
3a.1.13	Plant prep. & temp. svces	-	-	-	-	-	-	4,200	630	4,830	4,830	-	-	-	-	-	-	-	-	-	-
3a.1.14	Design water clean-up system	-	-	-	-	-	-	90	14	104	104	-	-	-	-	-	-	-	-	-	599
3a.1.15	Rigging/Cont. Cntrl Envlps/tooling/etc.	-	-	-	-	-	-	2,900	435	3,335	3,335	-	-	-	-	-	-	-	-	-	-
3a.1.16	Procure casks/liners & containers	-	-	-	-	-	-	79	12	91	91	-	-	-	-	-	-	-	-	-	526
3a.1	Subtotal Period 3a Activity Costs	-	-	-	-	-	-	12,076	1,811	13,887	13,554	-	354	-	-	-	-	-	-	-	83,002
Period 3a Additional Costs																					
3a.2.1	Site Characterization	-	-	-	-	-	-	2,490	747	3,237	3,237	-	-	-	-	-	-	-	-	13,794	1,616
3a.2	Subtotal Period 3a Additional Costs	-	-	-	-	-	-	2,490	747	3,237	3,237	-	-	-	-	-	-	-	-	13,794	1,616
Period 3a Collateral Costs																					
3a.3.1	Spent Fuel Capital and Transfer	-	-	-	-	-	-	399	60	459	-	459	-	-	-	-	-	-	-	-	-
3a.3	Subtotal Period 3a Collateral Costs	-	-	-	-	-	-	399	60	459	-	459	-	-	-	-	-	-	-	-	-
Period 3a Period-Dependent Costs																					
3a.4.1	Insurance	-	-	-	-	-	-	502	50	552	552	-	-	-	-	-	-	-	-	-	-
3a.4.2	Property taxes	-	-	-	-	-	-	449	45	494	494	-	-	-	-	-	-	-	-	-	-
3a.4.3	Health physics supplies	-	805	-	-	-	-	-	201	1,006	1,006	-	-	-	-	-	-	-	-	-	-
3a.4.4	Heavy equipment rental	-	899	-	-	-	-	-	135	1,033	1,033	-	-	-	-	-	-	-	-	-	-
3a.4.5	Disposal of DAW generated	-	-	10	5	-	10	-	4	29	29	-	-	-	481	-	-	-	9,613	16	-
3a.4.6	Plant energy budget	-	-	-	-	-	-	2,419	363	2,782	2,782	-	-	-	-	-	-	-	-	-	-
3a.4.7	NRC Fees	-	-	-	-	-	-	423	48	477	477	-	-	-	-	-	-	-	-	-	-
3a.4.8	ISFSI Operating Costs	-	-	-	-	-	-	66	10	76	-	76	-	-	-	-	-	-	-	-	-
3a.4.9	Security Staff Cost	-	-	-	-	-	-	1,952	293	2,244	803	1,441	-	-	-	-	-	-	-	-	43,679
3a.4.10	Utility Staff Cost	-	-	-	-	-	-	16,095	2,414	18,509	17,879	629	-	-	-	-	-	-	-	-	199,680
3a.4	Subtotal Period 3a Period-Dependent Costs	-	1,703	10	5	-	10	21,916	3,558	27,202	25,056	2,147	-	-	481	-	-	-	9,613	16	243,359
3a.0	TOTAL PERIOD 3a COST	-	1,703	10	5	-	10	36,881	6,177	44,786	41,827	2,605	354	-	481	-	-	-	9,613	13,810	280,977
PERIOD 3b - Decommissioning Preparations																					
Period 3b Direct Decommissioning Activities																					
Detailed Work Procedures																					
3b.1.1.1	Plant systems	-	-	-	-	-	-	805	46	851	816	-	35	-	-	-	-	-	-	-	2,026
3b.1.1.2	Reactor internals	-	-	-	-	-	-	161	24	186	186	-	-	-	-	-	-	-	-	-	1,070
3b.1.1.3	Remaining buildings	-	-	-	-	-	-	87	13	100	25	-	75	-	-	-	-	-	-	-	578
3b.1.1.4	CRD cooling assembly	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Detailed Work Procedures (continued)																					
3b.1.1.5	CRD housings & ICI tubes	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428
3b.1.1.6	Incore instrumentation	-	-	-	-	-	-	65	10	74	74	-	-	-	-	-	-	-	-	-	428
3b.1.1.7	Reactor vessel	-	-	-	-	-	-	234	35	269	269	-	-	-	-	-	-	-	-	-	1,554
3b.1.1.8	Facility closeout	-	-	-	-	-	-	77	12	89	45	-	45	-	-	-	-	-	-	-	514
3b.1.1.9	Missile shields	-	-	-	-	-	-	29	4	33	33	-	-	-	-	-	-	-	-	-	193
3b.1.1.10	Biological shield	-	-	-	-	-	-	77	12	89	89	-	-	-	-	-	-	-	-	-	514
3b.1.1.11	Steam generators	-	-	-	-	-	-	297	45	341	341	-	-	-	-	-	-	-	-	-	1,969
3b.1.1.12	Reinforced concrete	-	-	-	-	-	-	65	10	74	37	-	37	-	-	-	-	-	-	-	428
3b.1.1.13	Main Turbine	-	-	-	-	-	-	101	15	116	-	-	116	-	-	-	-	-	-	-	668
3b.1.1.14	Main Condensers	-	-	-	-	-	-	101	15	116	-	-	116	-	-	-	-	-	-	-	668
3b.1.1.15	Auxiliary building	-	-	-	-	-	-	176	26	203	182	-	20	-	-	-	-	-	-	-	1,168
3b.1.1.16	Reactor building	-	-	-	-	-	-	176	26	203	182	-	20	-	-	-	-	-	-	-	1,168
3b.1.1	Total	-	-	-	-	-	-	2,081	312	2,393	1,929	-	464	-	-	-	-	-	-	-	13,300
3b.1	Subtotal Period 3b Activity Costs	-	-	-	-	-	-	2,081	312	2,393	1,929	-	464	-	-	-	-	-	-	-	13,300
Period 3b Collateral Costs																					
3b.3.1	Decon equipment	1,253	-	-	-	-	-	-	188	1,441	1,441	-	-	-	-	-	-	-	-	-	-
3b.3.2	DOC staff relocation expenses	-	-	-	-	-	-	1,984	298	2,281	2,281	-	-	-	-	-	-	-	-	-	-
3b.3.3	Pipe cutting equipment	-	1,500	-	-	-	-	-	225	1,725	1,725	-	-	-	-	-	-	-	-	-	-
3b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	197	30	227	-	227	-	-	-	-	-	-	-	-	-
3b.3	Subtotal Period 3b Collateral Costs	1,253	1,500	-	-	-	-	2,181	740	5,674	5,447	227	-	-	-	-	-	-	-	-	-
Period 3b Period-Dependent Costs																					
3b.4.1	Decon supplies	44	-	-	-	-	-	-	11	55	55	-	-	-	-	-	-	-	-	-	-
3b.4.2	Insurance	-	-	-	-	-	-	256	26	282	282	-	-	-	-	-	-	-	-	-	-
3b.4.3	Property taxes	-	-	-	-	-	-	222	22	244	244	-	-	-	-	-	-	-	-	-	-
3b.4.4	Health physics supplies	-	424	-	-	-	-	-	106	531	531	-	-	-	-	-	-	-	-	-	-
3b.4.5	Heavy equipment rental	-	443	-	-	-	-	-	66	510	510	-	-	-	-	-	-	-	-	-	-
3b.4.6	Disposal of DAW generated	-	-	5	2	-	6	-	2	16	16	-	-	-	261	-	-	-	5,228	9	-
3b.4.7	Plant energy budget	-	-	-	-	-	-	1,193	179	1,372	1,372	-	-	-	-	-	-	-	-	-	-
3b.4.8	NRC Fees	-	-	-	-	-	-	214	21	235	235	-	-	-	-	-	-	-	-	-	-
3b.4.9	ISFSI Operating Costs	-	-	-	-	-	-	33	5	38	-	38	-	-	-	-	-	-	-	-	-
3b.4.10	Security Staff Cost	-	-	-	-	-	-	962	144	1,107	396	711	-	-	-	-	-	-	-	-	21,540
3b.4.11	DOC Staff Cost	-	-	-	-	-	-	4,040	606	4,646	4,646	-	-	-	-	-	-	-	-	-	42,059
3b.4.12	Utility Staff Cost	-	-	-	-	-	-	7,937	1,191	9,128	8,817	310	-	-	-	-	-	-	-	-	98,472
3b.4	Subtotal Period 3b Period-Dependent Costs	44	868	5	2	-	6	14,857	2,380	18,162	17,103	1,059	-	-	261	-	-	-	5,228	9	162,069
3b.0	TOTAL PERIOD 3b COST	1,297	2,368	5	2	-	6	19,119	3,432	26,229	24,479	1,285	464	-	261	-	-	-	5,228	9	175,369
PERIOD 3 TOTALS		1,297	4,071	15	7	-	16	56,000	9,609	71,015	66,306	3,891	818	-	742	-	-	-	14,840	13,818	456,845
PERIOD 4a - Large Component Removal																					
Period 4a Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
4a.1.1.1	Reactor Coolant Piping	19	95	25	23	-	180	-	84	425	425	-	-	-	1,275	-	-	-	88,984	2,165	-
4a.1.1.2	Pressurizer Relief Tank	5	19	11	10	-	82	-	30	158	158	-	-	-	581	-	-	-	40,513	605	-
4a.1.1.3	Reactor Coolant Pumps & Motors	20	66	86	264	-	1,207	-	375	2,009	2,009	-	-	-	7,231	-	-	-	792,800	2,575	100
4a.1.1.4	Pressurizer	-	42	456	131	-	575	-	219	1,423	1,423	-	-	-	3,445	-	-	-	240,508	1,346	938
4a.1.1.5	Steam Generators	-	5,169	708	2,058	-	9,934	-	4,155	22,024	22,024	-	-	-	59,529	-	-	-	3,527,500	11,171	2,125
4a.1.1.6	CRDMs/ICIs/Service Structure Removal	24	216	269	43	-	262	-	190	1,103	1,103	-	-	-	4,852	-	-	-	179,025	5,442	-
4a.1.1.7	Reactor Vessel Internals	27	5,576	13,772	514	-	3,489	312	2,558	26,248	26,248	-	-	-	5,242	501	337	-	348,163	24,328	1,131
4a.1.1.8	Reactor Vessel	-	7,388	2,131	465	-	2,050	312	7,224	19,520	19,520	-	-	-	15,681	-	-	-	978,871	24,328	1,131
4a.1.1	Totals	96	18,519	17,459	3,497	-	17,878	624	21,836	79,910	79,910	-	-	-	97,786	501	337	-	6,196,365	72,250	5,425
Removal of Major Equipment																					
4a.1.2	Main Turbine/Generator	-	277	1,001	618	-	5,870	-	1,730	9,495	9,495	-	-	-	15,743	-	-	-	2,905,964	6,999	-
4a.1.3	Main Condensers	-	442	1,358	838	-	7,964	-	2,363	12,965	12,965	-	-	-	62,059	-	-	-	3,942,431	11,391	-
Cascading Costs from Clean Building Demolition																					
4a.1.4.1	Reactor	-	582	-	-	-	-	-	87	669	669	-	-	-	-	-	-	-	-	5,559	-
4a.1.4.2	Auxiliary	-	274	-	-	-	-	-	41	315	315	-	-	-	-	-	-	-	-	2,033	-
4a.1.4.3	Safeguard	-	68	-	-	-	-	-	10	79	79	-	-	-	-	-	-	-	-	558	-
4a.1.4.4	Fuel	-	201	-	-	-	-	-	45	246	246	-	-	-	-	-	-	-	-	3,097	-
4a.1.4	Totals	-	1,225	-	-	-	-	-	184	1,409	1,409	-	-	-	-	-	-	-	-	11,248	-

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Disposal of Plant Systems																					
4a.1.5.1	Auxiliary Feedwater (insulated)	-	688	169	92	-	874	-	409	2,182	2,182	-	-	-	6,755	-	-	-	482,570	14,812	-
4a.1.5.2	Auxiliary Steam	-	127	-	-	-	-	-	19	146	-	-	146	-	-	-	-	-	-	3,676	-
4a.1.5.3	Boron Recycle (insulated)	-	36	4	2	-	18	-	14	78	78	-	-	-	135	-	-	-	8,754	797	-
4a.1.5.4	Boron Recycle (uninsulated)	-	258	80	46	-	441	-	218	1,184	1,184	-	-	-	8,420	-	-	-	218,469	8,307	-
4a.1.5.5	Boron Thermal Regeneration (insulated)	-	82	11	5	-	47	-	24	179	179	-	-	-	359	-	-	-	23,281	1,851	-
4a.1.5.6	Boron Thermal Regeneration (uninsulated)	-	221	34	17	-	158	-	101	530	530	-	-	-	1,215	-	-	-	78,456	5,034	-
4a.1.5.7	Carbon Dioxide Gas	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	20	-
4a.1.5.8	Chemical & Volume Control (insulated)	-	194	23	11	-	102	-	78	409	409	-	-	-	779	-	-	-	50,589	4,346	-
4a.1.5.9	Chemical & Volume Control (uninsulated)	-	516	95	51	-	489	-	268	1,419	1,419	-	-	-	3,774	-	-	-	242,229	11,961	-
4a.1.5.10	Chemical Feed	-	15	-	-	-	-	-	2	17	-	-	17	-	-	-	-	-	-	421	-
4a.1.5.11	Chemical Feed - RCA	-	9	1	0	-	2	-	3	15	15	-	-	-	15	-	-	-	971	253	-
4a.1.5.12	Chilled Water - Safety	-	5	-	-	-	-	-	1	6	-	-	6	-	-	-	-	-	-	159	-
4a.1.5.13	Chilled Water - Safety - RCA	-	106	15	7	-	62	-	44	233	233	-	-	-	471	-	-	-	30,681	2,282	-
4a.1.5.14	Chlorine	-	14	-	-	-	-	-	2	16	-	-	16	-	-	-	-	-	-	369	-
4a.1.5.15	Circulating Water	-	352	-	-	-	-	-	53	404	-	-	404	-	-	-	-	-	-	10,429	-
4a.1.5.16	Component Cooling Water	-	27	-	-	-	-	-	4	31	-	-	31	-	-	-	-	-	-	763	-
4a.1.5.17	Component Cooling Water - RCA	-	1,152	409	242	-	2,295	-	939	5,037	5,037	-	-	-	17,786	-	-	-	1,136,365	28,319	-
4a.1.5.18	Condensate (insulated)	-	146	-	-	-	-	-	22	168	-	-	168	-	-	-	-	-	-	4,373	-
4a.1.5.19	Condensate (uninsulated)	-	123	-	-	-	-	-	19	142	-	-	142	-	-	-	-	-	-	3,541	-
4a.1.5.20	Condensate Polishing	-	113	-	-	-	-	-	17	130	-	-	130	-	-	-	-	-	-	3,327	-
4a.1.5.21	Condenser Vacuum & Water Box Priming	-	69	-	-	-	-	-	10	79	-	-	79	-	-	-	-	-	-	2,017	-
4a.1.5.22	Extraction Steam	-	60	-	-	-	-	-	9	69	-	-	69	-	-	-	-	-	-	1,806	-
4a.1.5.23	Feedwater	-	239	-	-	-	-	-	36	275	-	-	275	-	-	-	-	-	-	7,084	-
4a.1.5.24	Feedwater - RCA	-	64	27	17	-	161	-	61	331	331	-	-	-	1,250	-	-	-	79,675	1,802	-
4a.1.5.25	Generator & Exciter	-	1	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	39	-
4a.1.5.26	Generator Gas Cooling	-	9	-	-	-	-	-	1	10	-	-	10	-	-	-	-	-	-	247	-
4a.1.5.27	Generator Primary Water	-	60	-	-	-	-	-	9	69	-	-	69	-	-	-	-	-	-	1,745	-
4a.1.5.28	Generator Seal Oil	-	8	-	-	-	-	-	1	9	-	-	9	-	-	-	-	-	-	218	-
4a.1.5.29	Hydrogen Gas	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	54	-
4a.1.5.30	Main Steam Reheat & Steam Dump	-	40	-	-	-	-	-	6	46	-	-	46	-	-	-	-	-	-	1,136	-
4a.1.5.31	Main Steam Reheat & Steam Dump - RCA	-	467	141	77	-	731	-	325	1,742	1,742	-	-	-	5,641	-	-	-	361,941	10,542	-
4a.1.5.32	Main Turbine Lube Oil	-	48	-	-	-	-	-	7	55	-	-	55	-	-	-	-	-	-	1,383	-
4a.1.5.33	Main Turbine Oil Purification	-	92	-	-	-	-	-	14	106	-	-	106	-	-	-	-	-	-	2,663	-
4a.1.5.34	Nitrogen Gas	-	1	-	-	-	-	-	0	1	-	-	1	-	-	-	-	-	-	39	-
4a.1.5.35	Oxygen Gas	-	1	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	42	-
4a.1.5.36	Post Accident Sampling	-	8	0	0	-	2	-	3	14	14	-	-	-	15	-	-	-	951	222	-
4a.1.5.37	Process Sampling (uninsulated)	-	9	3	2	-	23	-	9	47	47	-	-	-	177	-	-	-	11,236	241	-
4a.1.5.38	Reactor Coolant	-	113	15	7	-	70	-	48	254	254	-	-	-	534	-	-	-	34,556	2,542	-
4a.1.5.39	Reservoir Makeup Water	-	95	-	-	-	-	-	14	109	-	-	109	-	-	-	-	-	-	2,790	-
4a.1.5.40	Reservoir Return Water	-	70	-	-	-	-	-	11	81	-	-	81	-	-	-	-	-	-	2,095	-
4a.1.5.41	Reservoir Service Tower	-	10	-	-	-	-	-	2	12	-	-	12	-	-	-	-	-	-	308	-
4a.1.5.42	Residual Heat Removal	-	229	148	80	-	758	-	273	1,488	1,488	-	-	-	5,833	-	-	-	375,247	5,704	-
4a.1.5.43	Safety Injection (insulated)	-	126	37	20	-	190	-	85	454	454	-	-	-	1,405	-	-	-	93,997	2,705	-
4a.1.5.44	Safety Injection (uninsulated)	-	285	167	100	-	958	-	360	1,972	1,972	-	-	-	7,406	-	-	-	471,598	9,419	-
4a.1.5.45	Secondary Plant Sampling	-	32	-	-	-	-	-	5	37	-	-	37	-	-	-	-	-	-	1,040	-
4a.1.5.46	Steam Generator Blowdown & Cleanup	-	146	-	-	-	-	-	22	168	-	-	168	-	-	-	-	-	-	4,265	-
4a.1.5.47	Turbine Electrohydr Cntrl (insulated)	-	28	-	-	-	-	-	4	33	-	-	33	-	-	-	-	-	-	838	-
4a.1.5.48	Turbine Electrohydr Cntrl (uninsulated)	-	20	-	-	-	-	-	3	23	-	-	23	-	-	-	-	-	-	552	-
4a.1.5.49	Turbine Gland Steam & Drains	-	38	-	-	-	-	-	6	44	-	-	44	-	-	-	-	-	-	1,133	-
4a.1.5.50	Turbine Heater Drains	-	411	-	-	-	-	-	62	473	-	-	473	-	-	-	-	-	-	12,206	-
4a.1.5.51	Turbine Plant Cooling (insulated)	-	18	-	-	-	-	-	3	21	-	-	21	-	-	-	-	-	-	549	-
4a.1.5.52	Turbine Plant Cooling (uninsulated)	-	149	-	-	-	-	-	22	172	-	-	172	-	-	-	-	-	-	4,420	-
4a.1.5.53	Turbines (HIGH - LOW) (insulated)	-	5	-	-	-	-	-	1	6	-	-	6	-	-	-	-	-	-	150	-
4a.1.5.54	Turbines (HIGH - LOW) (uninsulated)	-	16	-	-	-	-	-	2	18	-	-	18	-	-	-	-	-	-	474	-
4a.1.5.55	Vent Chilled Water - Non Safety	-	82	-	-	-	-	-	12	95	-	-	95	-	-	-	-	-	-	2,423	-
4a.1.5.56	Vent Chilled Water - Non Safety - RCA	-	689	143	70	-	604	-	350	1,866	1,866	-	-	-	5,088	-	-	-	328,470	13,990	-
4a.1.5.57	Westinghouse Process Instruments	-	1	0	0	-	2	-	2	8	8	-	-	-	16	-	-	-	993	99	-
4a.1.5	Totals	-	8,025	1,522	846	-	8,042	-	4,028	22,462	19,387	-	3,076	-	62,132	-	-	-	3,990,962	201,298	-
4a.1.6	Scaffolding in support of decommissioning	-	1,223	25	16	-	149	-	348	1,760	1,760	-	-	-	1,157	-	-	-	73,529	36,951	-
4a.1	Subtotal Period 4a Activity Costs	90	29,711	21,365	5,815	-	29,901	624	30,488	128,001	124,925	-	3,076	-	268,878	501	337	-	17,099,270	340,139	5,425
Period 4a Additional Costs																					
4a.2.1	Remedial Action Surveys	-	-	-	-	-	-	1,597	479	2,076	2,076	-	-	-	-	-	-	-	-	29,157	-
4a.2	Subtotal Period 4a Additional Costs	-	-	-	-	-	-	1,597	479	2,076	2,076	-	-	-	-	-	-	-	-	29,157	-

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Period 1a Collateral Costs																					
4a.8.1	Process decommissioning water waste	6	-	10	15	-	11	-	9	52	52	-	-	-	87	-	-	-	5,242	17	-
4a.8.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4a.8.3	Small tool allowance	-	261	-	-	-	-	-	39	300	270	-	30	-	-	-	-	-	-	-	-
4a.8.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	561	84	645	-	645	-	-	-	-	-	-	-	-	-
4a.8	Subtotal Period 4a Collateral Costs	6	261	10	15	-	11	561	122	996	321	645	30	-	87	-	-	-	5,242	17	-
Period 1a Period-Dependent Costs																					
1a.4.1	Decon supplies	125	-	-	-	-	-	-	31	156	156	-	-	-	-	-	-	-	-	-	-
1a.4.2	Insurance	-	-	-	-	-	-	729	73	801	801	-	-	-	-	-	-	-	-	-	-
1a.4.3	Property taxes	-	-	-	-	-	-	631	63	694	694	-	-	-	-	-	-	-	-	-	-
4a.4.4	Health physics supplies	-	4,615	-	-	-	-	-	1,154	5,769	5,769	-	-	-	-	-	-	-	-	-	-
4a.4.5	Heavy equipment rental	-	3,941	-	-	-	-	-	591	4,532	4,532	-	-	-	-	-	-	-	-	-	-
4a.4.6	Disposal of DAW generated	-	-	107	49	-	118	-	46	314	314	-	-	-	5,160	-	-	-	103,192	168	-
4a.4.7	Plant energy budget	-	-	-	-	-	-	2,224	484	2,707	2,707	-	-	-	-	-	-	-	-	-	-
4a.4.8	NRC Fees	-	-	-	-	-	-	677	68	745	745	-	-	-	-	-	-	-	-	-	-
1a.4.9	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	727	109	836	836	-	-	-	-	-	-	-	-	-	-
1a.4.10	ISFSI Operating Costs	-	-	-	-	-	-	93	14	107	-	107	-	-	-	-	-	-	-	-	-
1a.4.11	Security Staff Cost	-	-	-	-	-	-	2,737	411	3,148	1,127	2,021	-	-	-	-	-	-	-	-	61,270
1a.4.12	DOC Staff Cost	-	-	-	-	-	-	19,423	2,913	22,336	22,336	-	-	-	-	-	-	-	-	-	199,828
1a.4.13	Utility Staff Cost	-	-	-	-	-	-	29,485	4,423	33,907	32,890	1,017	-	-	-	-	-	-	-	-	357,179
4a.4	Subtotal Period 4a Period-Dependent Costs	125	8,556	107	49	-	118	57,726	10,379	77,054	73,908	3,146	-	-	5,160	-	-	-	103,192	168	618,277
4a.0	TOTAL PERIOD 4a COST	227	28,527	21,482	5,879	-	40,025	60,509	41,479	208,127	201,281	3,791	3,106	-	274,125	501	387	-	17,207,700	369,479	623,702
PERIOD 4b - Site Decontamination																					
Period 1b Direct Decommissioning Activities																					
Disposal of Plant Systems																					
4b.1.1.1	Auxiliary Building HVAC (insulated)	-	53	11	7	-	70	-	33	175	175	-	-	-	549	-	-	-	34,870	982	-
4b.1.1.2	Auxiliary Building HVAC (uninsulated)	-	65	12	9	-	82	-	39	208	208	-	-	-	638	-	-	-	40,534	1,591	-
4b.1.1.3	Batt Rms & Misc Uncontrolled Acc. HVAC	-	3	-	-	-	-	-	0	3	-	-	3	-	-	-	-	-	-	91	-
4b.1.1.4	Compressed Air - Instr. Air (insulated)	-	3	-	-	-	-	-	0	3	-	-	3	-	-	-	-	-	-	83	-
4b.1.1.5	Compressed Air - Instrument Air - RCA (i	-	48	4	2	-	16	-	17	86	86	-	-	-	121	-	-	-	7,922	1,178	-
4b.1.1.6	Compressed Air - Instrument Air - RCA (u	-	142	21	9	-	85	-	60	317	317	-	-	-	949	-	-	-	42,216	2,977	-
4b.1.1.7	Compressed Air - Service Air	-	29	-	-	-	-	-	4	34	-	-	34	-	-	-	-	-	-	886	-
4b.1.1.8	Compressed Air - Service Air - RCA	-	148	19	8	-	77	-	59	311	311	-	-	-	583	-	-	-	37,981	3,284	-
4b.1.1.9	Compressed Air - instr. Air(uninsulated)	-	43	-	-	-	-	-	6	49	-	-	49	-	-	-	-	-	-	1,267	-
4b.1.1.10	Containment Hatches	-	17	2	1	-	12	-	8	40	40	-	-	-	93	-	-	-	6,019	389	-
4b.1.1.11	Containment Hydrogen Purge HVAC	-	56	15	8	-	75	-	35	189	189	-	-	-	578	-	-	-	37,163	1,512	-
4b.1.1.12	Containment Spray	-	415	333	182	-	1,726	-	596	3,251	3,251	-	-	-	13,318	-	-	-	854,341	10,156	-
4b.1.1.13	Containment Ventilation HVAC (uninsul)	-	31	10	7	-	65	-	26	138	138	-	-	-	504	-	-	-	31,997	718	-
4b.1.1.14	Containment Ventilation HVAC(insulated)	-	211	124	76	-	726	-	258	1,395	1,395	-	-	-	5,623	-	-	-	359,197	4,753	-
4b.1.1.15	Control Room HVAC	-	39	-	-	-	-	-	6	45	-	-	45	-	-	-	-	-	-	1,144	-
4b.1.1.16	Demineralized & ROS Makeup Water	-	132	-	-	-	-	-	20	152	-	-	152	-	-	-	-	-	-	3,662	-
4b.1.1.17	Demineralized & ROS Makeup Water - RCA	-	454	70	31	-	296	-	199	1,049	1,049	-	-	-	2,253	-	-	-	146,836	9,541	-
1b.1.1.18	Diesel Gen & Auxiliaries (insulated)	-	6	-	-	-	-	-	1	7	-	-	7	-	-	-	-	-	-	185	-
1b.1.1.19	Diesel Gen & Auxiliaries (uninsulated)	-	81	-	-	-	-	-	12	93	-	-	93	-	-	-	-	-	-	2,314	-
1b.1.1.20	Diesel Generator Fuel Oil	-	13	-	-	-	-	-	2	15	-	-	15	-	-	-	-	-	-	365	-
1b.1.1.21	Diesel Room HVAC	-	4	-	-	-	-	-	1	5	-	-	5	-	-	-	-	-	-	117	-
1b.1.1.22	Electrical - Clean	-	2,023	-	-	-	-	-	303	2,326	-	-	2,326	-	-	-	-	-	-	56,765	-
4b.1.1.23	Electrical - Contaminated	-	300	40	28	-	236	-	150	784	784	-	-	-	2,073	-	-	-	131,669	6,612	-
4b.1.1.24	Electrical - Contaminated FHB	-	69	8	6	-	56	-	32	168	168	-	-	-	412	-	-	-	26,148	1,504	-
4b.1.1.25	Electrical - RCA	-	2,688	361	250	-	2,375	-	1,340	7,015	7,015	-	-	-	18,511	-	-	-	1,175,973	59,211	-
4b.1.1.26	Electrical - RCA FHB	-	495	78	52	-	498	-	264	1,387	1,387	-	-	-	3,879	-	-	-	246,422	10,274	-
4b.1.1.27	Fire Protection	-	518	-	-	-	-	-	78	596	-	-	596	-	-	-	-	-	-	14,858	-
1b.1.1.28	Fire Protection - RCA	-	851	191	95	-	898	-	470	2,504	2,504	-	-	-	6,895	-	-	-	444,645	18,575	-
1b.1.1.29	Fuel Building HVAC (insulated)	-	24	5	3	-	32	-	15	79	79	-	-	-	248	-	-	-	15,765	444	-
1b.1.1.30	Fuel Building HVAC (uninsulated)	-	30	6	4	-	37	-	18	95	95	-	-	-	290	-	-	-	18,441	598	-
1b.1.1.31	Fuel Handling	-	6	1	1	-	8	-	4	19	19	-	-	-	61	-	-	-	3,891	134	-
1b.1.1.32	Leak Rate Test	-	5	1	0	-	4	-	2	13	13	-	-	-	34	-	-	-	2,202	110	-
4b.1.1.33	Misc Plant HVAC (insulated)	-	2	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	72	-
4b.1.1.34	Misc Plant HVAC (uninsulated)	-	30	-	-	-	-	-	4	34	-	-	34	-	-	-	-	-	-	955	-
4b.1.1.35	Miscellaneous Equipment	-	7	1	1	-	10	-	4	23	23	-	-	-	75	-	-	-	4,779	157	-
4b.1.1.36	Office & Service HVAC	-	3	-	-	-	-	-	0	3	-	-	3	-	-	-	-	-	-	84	-
4b.1.1.37	Potable Water	-	68	-	-	-	-	-	10	78	-	-	78	-	-	-	-	-	-	1,892	-
1b.1.1.38	Primary Plant HVAC (insulated)	-	55	11	8	-	73	-	34	182	182	-	-	-	570	-	-	-	36,188	1,019	-
4b.1.1.39	Primary Plant HVAC (uninsulated)	-	100	26	18	-	168	-	72	384	384	-	-	-	1,312	-	-	-	83,321	2,144	-

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Disposal of Plant Systems (continued)																					
4b.1.1.40	Radiation Monitoring	-	4	-	-	-	-	-	1	4	-	-	4	-	-	-	-	-	-	102	-
4b.1.1.41	Safeguards Building HVAC (insulated)	-	17	3	2	-	22	-	10	55	55	-	-	-	174	-	-	-	11,048	311	-
4b.1.1.42	Safeguards Building HVAC (uninsulated)	-	46	8	6	-	52	-	26	138	138	-	-	-	409	-	-	-	25,970	1,080	-
4b.1.1.43	Service Water	-	64	-	-	-	-	-	10	73	-	-	73	-	-	-	-	-	-	1,882	-
4b.1.1.44	Service Water - RCA	-	229	112	70	-	666	-	246	1,323	1,323	-	-	-	5,178	-	-	-	329,913	5,480	-
1b.1.1.45	Sewage Treatment	-	24	-	-	-	-	-	4	28	-	-	28	-	-	-	-	-	-	678	-
1b.1.1.46	Spent Fuel Pool Cooling & Cleanup	-	867	218	111	-	1,055	-	519	2,769	2,769	-	-	-	8,090	-	-	-	522,128	19,899	-
1b.1.1.47	Turbine Building HVAC (insulated)	-	3	-	-	-	-	-	0	3	-	-	3	-	-	-	-	-	-	92	-
1b.1.1.48	Turbine Building HVAC (uninsulated)	-	29	-	-	-	-	-	4	33	-	-	33	-	-	-	-	-	-	840	-
1b.1.1.49	UPS HVAC	-	1	-	-	-	-	-	0	2	-	-	2	-	-	-	-	-	-	39	-
4b.1.1.50	Vents & Drains	-	38	-	-	-	-	-	6	44	-	-	44	-	-	-	-	-	-	1,092	-
4b.1.1.51	Vents & Drains - RCA	-	455	61	29	-	277	-	194	1,017	1,017	-	-	-	2,118	-	-	-	137,826	10,245	-
4b.1.1.52	Waste Management (insulated)	-	13	-	-	-	-	-	2	15	-	-	15	-	-	-	-	-	-	399	-
4b.1.1.53	Waste Management (uninsulated)	-	139	-	-	-	-	-	21	160	-	-	160	-	-	-	-	-	-	4,043	-
4b.1.1.54	Waste Processing Gas (uninsulated)	-	94	35	22	-	218	-	84	448	448	-	-	-	1,658	-	-	-	105,849	2,375	-
1b.1.1.55	Waste Processing Liquid (insulated)	-	297	33	15	-	141	-	113	588	588	-	-	-	1,075	-	-	-	69,909	6,395	-
1b.1.1.56	Waste Processing Liquid (uninsulated)	-	377	101	61	-	580	-	259	1,379	1,379	-	-	-	4,505	-	-	-	287,192	9,097	-
1b.1.1.57	Waste Processing Solid	-	22	9	6	-	56	-	21	114	114	-	-	-	438	-	-	-	27,878	543	-
1b.1.1.58	Water Treatment (insulated)	-	60	-	-	-	-	-	9	69	-	-	69	-	-	-	-	-	-	1,780	-
1b.1.1.59	Water Treatment (uninsulated)	-	639	-	-	-	-	-	96	735	-	-	735	-	-	-	-	-	-	18,716	-
4b.1.1	Totals	-	12,671	1,921	1,128	-	10,716	-	5,808	32,264	27,642	-	4,611	-	82,912	-	-	-	5,304,755	307,216	-
4b.1.2	Scaffolding in support of decommissioning	-	1,528	32	20	-	180	-	435	2,200	2,200	-	-	-	1,447	-	-	-	91,900	46,189	-
Decontamination of Site Buildings																					
4b.1.3.1	Reactor	1,156	695	109	184	-	1,178	-	1,084	4,400	4,400	-	-	-	14,749	-	-	-	788,248	42,080	-
1b.1.3.2	Auxiliary	749	239	47	93	-	541	-	587	2,246	2,246	-	-	-	6,770	-	-	-	334,638	22,770	-
1b.1.3.3	Radwaste Warehouse	218	13	1	1	-	20	-	133	419	419	-	-	-	285	-	-	-	13,482	6,381	-
1b.1.3.4	Safeguard	146	52	14	15	-	113	-	118	460	460	-	-	-	1,292	-	-	-	64,941	4,627	-
1b.1.3	Totals	2,300	1,000	171	286	-	1,847	-	1,922	7,525	7,525	-	-	-	23,096	-	-	-	1,146,309	76,814	-
4b.1.4	Prepare/submit License Termination Plan	-	-	-	-	-	-	264	40	304	304	-	-	-	-	-	-	-	-	-	1,758
4b.1.5	Receive NRC approval of termination plan									a											
4b.1	Subtotal Period 4b Activity Costs	2,300	15,199	2,124	1,434	-	12,749	264	8,204	42,288	37,671	-	4,611	-	107,455	-	-	-	6,542,964	420,218	1,758
Period 4b Additional Costs																					
1b.2.1	License Termination Survey Planning	-	-	-	-	-	-	1,236	371	1,607	1,607	-	-	-	-	-	-	-	-	-	6,210
1b.2.2	Operational Tools & Equipment	-	-	11	43	-	218	-	62	333	333	-	-	-	5,850	-	-	-	146,250	18	-
1b.2.3	Excavation of Underground Services	-	1,794	-	-	-	-	757	562	3,113	3,113	-	-	-	-	-	-	-	-	11,945	-
1b.2.4	Remedial Action Surveys	-	-	-	-	-	-	2,049	615	2,664	2,664	-	-	-	-	-	-	-	-	37,111	-
4b.2	Subtotal Period 4b Additional Costs	-	1,794	11	43	-	218	4,042	1,610	7,717	7,717	-	-	-	5,850	-	-	-	146,250	49,076	6,240
Period 4b Collateral Costs																					
4b.3.1	Process decommissioning water waste	8	-	14	20	-	16	-	12	69	69	-	-	-	118	-	-	-	7,078	23	-
4b.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1b.3.3	Small tool allowance	-	271	-	-	-	-	-	41	311	311	-	-	-	-	-	-	-	-	-	-
1b.3.4	Spent Fuel Capital and Transfer	-	-	-	-	-	-	719	108	827	-	827	-	-	-	-	-	-	-	-	-
4b.3	Subtotal Period 4b Collateral Costs	8	271	14	20	-	16	719	161	1,208	381	827	-	-	118	-	-	-	7,078	23	-
Period 4b Period-Dependent Costs																					
4b.4.1	Decon supplies	2,164	-	-	-	-	-	-	541	2,706	2,706	-	-	-	-	-	-	-	-	-	-
4b.4.2	Insurance	-	-	-	-	-	-	925	93	1,028	1,028	-	-	-	-	-	-	-	-	-	-
4b.4.3	Property taxes	-	-	-	-	-	-	809	81	890	890	-	-	-	-	-	-	-	-	-	-
4b.4.4	Health physics supplies	-	5,936	-	-	-	-	-	1,484	7,420	7,420	-	-	-	-	-	-	-	-	-	-
4b.4.5	Heavy equipment rental	-	5,185	-	-	-	-	-	777	5,961	5,961	-	-	-	-	-	-	-	-	-	-
1b.4.6	Disposal of DAW generated	-	-	117	54	-	124	-	51	345	345	-	-	-	5,672	-	-	-	113,439	185	-
1b.4.7	Plant energy budget	-	-	-	-	-	-	3,266	490	3,756	3,756	-	-	-	-	-	-	-	-	-	-
1b.4.8	NRC Fees	-	-	-	-	-	-	869	87	956	956	-	-	-	-	-	-	-	-	-	-
1b.4.9	Liquid Radwaste Processing Equipment/Services	-	-	-	-	-	-	933	140	1,073	1,073	-	-	-	-	-	-	-	-	-	-
1b.4.10	ISFSI Operating Costs	-	-	-	-	-	-	120	18	138	-	138	-	-	-	-	-	-	-	-	-
4b.4.11	Security Staff Cost	-	-	-	-	-	-	3,513	527	4,040	1,446	2,593	-	-	-	-	-	-	-	-	78,622
4b.4.12	DOC Staff Cost	-	-	-	-	-	-	24,517	3,678	28,195	28,195	-	-	-	-	-	-	-	-	-	250,848
4b.4.13	Utility Staff Cost	-	-	-	-	-	-	37,154	5,573	42,727	41,189	1,538	-	-	-	-	-	-	-	-	445,536
4b.4	Subtotal Period 4b Period-Dependent Costs	2,164	11,119	117	54	-	124	72,116	13,540	99,234	94,965	4,269	-	-	5,672	-	-	-	113,439	185	775,006
4b.0	TOTAL PERIOD 4b COST	4,472	28,383	2,276	1,549	-	13,106	77,141	23,514	150,441	140,734	5,096	4,611	-	119,095	-	-	-	6,809,731	479,802	782,999

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
PERIOD 4d - Continuing Site Decontamination																					
Period 4d Direct Decommissioning Activities																					
4d.1.1	Remove spent fuel racks	264	28	120	41	-	290	-	256	1,109	1,109	-	-	-	8,042	-	-	-	198,246	838	-
Decontamination of Site Buildings																					
4d.1.3.1	Fuel	793	811	104	59	-	493	-	742	3,001	3,001	-	-	-	4,504	-	-	-	261,376	37,978	-
4d.1.3	Totals	793	811	104	59	-	493	-	742	3,001	3,001	-	-	-	4,504	-	-	-	261,376	37,978	-
4d.1.4	Scaffolding in support of decommissioning	-	306	6	4	-	37	-	87	440	440	-	-	-	289	-	-	-	18,380	9,238	-
4d.1	Subtotal Period 4d Activity Costs	1,056	1,144	240	104	-	921	-	1,084	4,549	4,549	-	-	-	7,835	-	-	-	478,001	48,054	-
Period 4d Additional Costs																					
4d.2.1	Remedial Action Surveys	-	-	-	-	-	-	624	187	811	811	-	-	-	-	-	-	-	-	11,389	-
4d.2	Subtotal Period 4d Additional Costs	-	-	-	-	-	-	624	187	811	811	-	-	-	-	-	-	-	-	11,389	-
Period 4d Collateral Costs																					
4d.3.1	Process decommissioning water waste	6	-	10	15	-	11	-	9	51	51	-	-	-	87	-	-	-	5,241	17	-
4d.3.2	Process decommissioning chemical flush waste	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4d.3.3	Small tool allowance	-	37	-	-	-	-	-	5	42	42	-	-	-	-	-	-	-	-	-	-
4d.3.4	Decommissioning Equipment Disposition	-	-	116	71	-	679	-	192	1,058	1,058	-	-	-	5,290	-	-	-	330,079	147	-
4d.3.5	Spent Fuel Capital and Transfer	-	-	-	-	-	-	219	33	252	-	252	-	-	-	-	-	-	-	-	-
4d.3	Subtotal Period 4d Collateral Costs	6	37	126	86	-	690	219	239	1,403	1,151	252	-	-	5,378	-	-	-	341,322	164	-
Period 4d Period-Dependent Costs																					
4d.4.1	Decon supplies	359	-	-	-	-	-	-	90	449	449	-	-	-	-	-	-	-	-	-	-
4d.4.2	Insurance	-	-	-	-	-	-	285	28	313	313	-	-	-	-	-	-	-	-	-	-
4d.4.3	Property taxes	-	-	-	-	-	-	246	25	271	271	-	-	-	-	-	-	-	-	-	-
4d.4.4	Health physics supplies	-	1,002	-	-	-	-	-	250	1,252	1,252	-	-	-	-	-	-	-	-	-	-
4d.4.5	Heavy equipment rental	-	1,578	-	-	-	-	-	237	1,814	1,814	-	-	-	-	-	-	-	-	-	-
4d.4.6	Disposal of DAW generated	-	-	36	16	-	38	-	15	105	105	-	-	-	1,721	-	-	-	34,425	56	-
4d.4.7	Plant energy budget	-	-	-	-	-	-	520	80	610	610	-	-	-	-	-	-	-	-	-	-
4d.4.8	NRC Fees	-	-	-	-	-	-	265	26	291	291	-	-	-	-	-	-	-	-	-	-
4d.4.9	ISFSI Operating Costs	-	-	-	-	-	-	38	5	42	-	42	-	-	-	-	-	-	-	-	-
4d.4.10	Security Staff Cost	-	-	-	-	-	-	1,069	160	1,230	440	789	-	-	-	-	-	-	-	-	23,834
4d.4.11	DOC Staff Cost	-	-	-	-	-	-	5,016	752	5,768	5,768	-	-	-	-	-	-	-	-	-	51,288
4d.4.12	Utility Staff Cost	-	-	-	-	-	-	8,712	1,307	10,019	9,518	501	-	-	-	-	-	-	-	-	103,145
4d.4	Subtotal Period 4d Period-Dependent Costs	359	2,579	36	16	-	38	16,159	2,976	22,163	20,831	1,332	-	-	1,721	-	-	-	34,425	56	178,267
4d.0	TOTAL PERIOD 4d COST	1,421	3,760	402	206	-	1,649	17,002	4,487	28,927	27,343	1,584	-	-	14,934	-	-	-	848,750	59,663	178,267
PERIOD 4f - License Termination																					
Period 4f Direct Decommissioning Activities																					
4f.1.1	ORISE confirmatory survey	-	-	-	-	-	-	180	54	234	234	-	-	-	-	-	-	-	-	-	-
4f.1.2	Terminate license									6											
4f.1	Subtotal Period 4f Activity Costs	-	-	-	-	-	-	180	54	234	234	-	-	-	-	-	-	-	-	-	-
Period 4f Additional Costs																					
4f.2.1	License Termination Survey	-	-	-	-	-	-	7,338	2,202	9,540	9,540	-	-	-	-	-	-	-	-	153,524	3,120
4f.2	Subtotal Period 4f Additional Costs	-	-	-	-	-	-	7,338	2,202	9,540	9,540	-	-	-	-	-	-	-	-	153,524	3,120
Period 4f Collateral Costs																					
4f.3.1	DOC staff relocation expenses	-	-	-	-	-	-	1,984	298	2,281	2,281	-	-	-	-	-	-	-	-	-	-
4f.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	301	45	347	-	347	-	-	-	-	-	-	-	-	-
4f.3	Subtotal Period 4f Collateral Costs	-	-	-	-	-	-	2,285	343	2,628	2,281	347	-	-	-	-	-	-	-	-	-
Period 4f Period-Dependent Costs																					
4f.4.1	Insurance	-	-	-	-	-	-	391	39	430	430	-	-	-	-	-	-	-	-	-	-
4f.4.2	Property taxes	-	-	-	-	-	-	339	34	373	373	-	-	-	-	-	-	-	-	-	-
4f.4.3	Health physics supplies	-	1,429	-	-	-	-	-	357	1,786	1,786	-	-	-	-	-	-	-	-	-	-
4f.4.4	Disposal of DAW generated	-	-	7	3	-	7	-	3	20	20	-	-	-	887	-	-	-	6,734	11	-
4f.4.5	Plant energy budget	-	-	-	-	-	-	385	55	419	419	-	-	-	-	-	-	-	-	-	-
4f.4.6	NRC Fees	-	-	-	-	-	-	414	41	455	455	-	-	-	-	-	-	-	-	-	-
4f.4.7	ISFSI Operating Costs	-	-	-	-	-	-	50	8	58	-	58	-	-	-	-	-	-	-	-	-
4f.4.8	Security Staff Cost	-	-	-	-	-	-	1,470	221	1,691	605	1,086	-	-	-	-	-	-	-	-	32,909
4f.4.9	DOC Staff Cost	-	-	-	-	-	-	4,608	691	5,299	5,299	-	-	-	-	-	-	-	-	-	46,622
4f.4.10	Utility Staff Cost	-	-	-	-	-	-	5,212	782	5,994	5,442	551	-	-	-	-	-	-	-	-	59,942

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
4f.4	Subtotal Period 4f Period-Dependent Costs	-	1,429	7	3	-	7	12,848	2,230	16,525	14,831	1,695	-	-	337	-	-	-	6,734	11	139,473
4f.0	TOTAL PERIOD 4f COST	-	1,429	7	3	-	7	22,652	4,829	28,927	26,886	2,041	-	-	337	-	-	-	6,734	153,535	142,593
PERIOD 4 TOTALS		6,120	72,100	24,166	7,637	-	54,787	177,204	74,309	416,423	396,194	12,512	7,717	-	408,491	501	337	-	24,872,920	1,062,479	1,727,661
PERIOD 5b - Site Restoration																					
Period 5b Direct Decommissioning Activities																					
Demolition of Remaining Site Buildings																					
5b.1.1.1	Reactor	-	2,308	-	-	-	-	-	490	2,799	-	-	2,799	-	-	-	-	-	-	21,617	-
5b.1.1.2	Administration	-	93	-	-	-	-	-	14	107	-	-	107	-	-	-	-	-	-	1,282	-
5b.1.1.3	Auxiliary	-	2,467	-	-	-	-	-	370	2,837	-	-	2,837	-	-	-	-	-	-	18,402	-
5b.1.1.4	Chlorination (CW Intake)	-	18	-	-	-	-	-	3	20	-	-	20	-	-	-	-	-	-	207	-
5b.1.1.5	Chlorination (SW Intake)	-	6	-	-	-	-	-	1	7	-	-	7	-	-	-	-	-	-	95	-
5b.1.1.6	Circ Water Intake	-	731	-	-	-	-	-	110	841	-	-	841	-	-	-	-	-	-	5,146	-
5b.1.1.7	Circ Water Yard Piping	-	23	-	-	-	-	-	3	26	-	-	26	-	-	-	-	-	-	36	-
5b.1.1.8	Diesel Generator	-	455	-	-	-	-	-	68	523	-	-	523	-	-	-	-	-	-	4,210	-
5b.1.1.9	Fencing Vehicle Barriers ISFs	-	1,226	-	-	-	-	-	184	1,409	-	-	1,409	-	-	-	-	-	-	8,207	-
5b.1.1.10	Flex Storage Building	-	558	-	-	-	-	-	84	642	-	-	642	-	-	-	-	-	-	3,621	-
5b.1.1.11	Maintenance	-	180	-	-	-	-	-	27	207	-	-	207	-	-	-	-	-	-	2,408	-
5b.1.1.12	Megawatt Support Ctr & Material Staging	-	266	-	-	-	-	-	40	306	-	-	306	-	-	-	-	-	-	3,909	-
5b.1.1.13	Miscellaneous Site Structures	-	7,631	-	-	-	-	-	1,145	8,776	-	-	8,776	-	-	-	-	-	-	98,785	-
5b.1.1.14	RP Building	-	57	-	-	-	-	-	8	65	-	-	65	-	-	-	-	-	-	732	-
5b.1.1.15	Radwaste Warehouse	-	174	-	-	-	-	-	26	201	-	-	201	-	-	-	-	-	-	3,171	-
5b.1.1.16	Safeguard	-	1,302	-	-	-	-	-	195	1,497	-	-	1,497	-	-	-	-	-	-	10,725	-
5b.1.1.17	Service Water Intake Structure	-	309	-	-	-	-	-	46	355	-	-	355	-	-	-	-	-	-	2,370	-
5b.1.1.18	Stator Rewind	-	130	-	-	-	-	-	20	150	-	-	150	-	-	-	-	-	-	2,030	-
5b.1.1.19	Switchgear	-	91	-	-	-	-	-	14	104	-	-	104	-	-	-	-	-	-	795	-
5b.1.1.20	Switchyard Relay House	-	19	-	-	-	-	-	3	21	-	-	21	-	-	-	-	-	-	290	-
5b.1.1.21	Tanks & Tunnels	-	572	-	-	-	-	-	86	657	-	-	657	-	-	-	-	-	-	7,678	-
5b.1.1.22	Turbine	-	575	-	-	-	-	-	86	661	-	-	661	-	-	-	-	-	-	7,230	-
5b.1.1.23	Turbine Pedestal	-	637	-	-	-	-	-	96	732	-	-	732	-	-	-	-	-	-	4,159	-
5b.1.1.24	Fuel	-	2,709	-	-	-	-	-	406	3,116	-	-	3,116	-	-	-	-	-	-	27,877	-
5b.1.1	Totals	-	23,526	-	-	-	-	-	3,529	27,055	-	-	27,055	-	-	-	-	-	-	245,427	-
Site Closeout Activities																					
5b.1.2	BackFill Site	-	2,577	-	-	-	-	-	387	2,964	-	-	2,964	-	-	-	-	-	-	5,898	-
5b.1.3	Grade & landscape site	-	462	-	-	-	-	-	69	532	-	-	532	-	-	-	-	-	-	1,292	-
5b.1.4	Final report to NRC	-	-	-	-	-	-	101	15	116	116	-	-	-	-	-	-	-	-	-	668
5b.1	Subtotal Period 5b Activity Costs	-	26,566	-	-	-	-	101	4,000	30,667	116	-	30,551	-	-	-	-	-	-	252,605	668
Period 5b Additional Costs																					
5b.2.1	Concrete Crushing	-	1,670	-	-	-	-	15	253	1,937	-	-	1,937	-	-	-	-	-	-	7,552	-
5b.2.2	Construction Debris	-	-	-	-	-	-	2,802	420	3,222	-	-	3,222	-	-	-	-	-	-	-	-
5b.2.3	Service Water Cofferdam	-	459	-	-	-	-	-	69	528	-	-	528	-	-	-	-	-	-	3,811	-
5b.2.4	Circulating Water Cofferdam	-	474	-	-	-	-	-	71	545	-	-	545	-	-	-	-	-	-	3,941	-
5b.2.5	Firing Range	-	33	-	-	-	-	66	15	114	-	-	114	-	-	-	-	-	-	237	-
5b.2	Subtotal Period 5b Additional Costs	-	2,636	-	-	-	-	2,882	828	6,346	-	-	6,346	-	-	-	-	-	-	15,542	-
Period 5b Collateral Costs																					
5b.3.1	Small tool allowance	-	169	-	-	-	-	-	25	194	-	-	194	-	-	-	-	-	-	-	-
5b.3.2	Spent Fuel Capital and Transfer	-	-	-	-	-	-	800	120	920	-	920	-	-	-	-	-	-	-	-	-
5b.3	Subtotal Period 5b Collateral Costs	-	169	-	-	-	-	800	145	1,114	-	920	194	-	-	-	-	-	-	-	-
Period 5b Period-Dependent Costs																					
5b.4.1	Insurance	-	-	-	-	-	-	519	52	571	-	-	571	-	-	-	-	-	-	-	-
5b.4.2	Property taxes	-	-	-	-	-	-	900	90	990	-	-	990	-	-	-	-	-	-	-	-
5b.4.3	Heavy equipment rental	-	7,880	-	-	-	-	-	1,182	9,062	-	-	9,062	-	-	-	-	-	-	-	-
5b.4.4	Plant energy budget	-	-	-	-	-	-	484	73	556	-	-	556	-	-	-	-	-	-	-	-
5b.4.5	NRC ISFSI Fees	-	-	-	-	-	-	490	49	539	-	539	-	-	-	-	-	-	-	-	-
5b.4.6	ISFSI Operating Costs	-	-	-	-	-	-	138	20	158	-	158	-	-	-	-	-	-	-	-	-
5b.4.7	Security Staff Cost	-	-	-	-	-	-	2,903	585	4,489	(0)	2,882	1,607	-	-	-	-	-	-	-	87,358
5b.4.8	DOC Staff Cost	-	-	-	-	-	-	11,197	1,680	12,877	-	-	12,877	-	-	-	-	-	-	-	110,240
5b.4.9	Utility Staff Cost	-	-	-	-	-	-	6,013	902	6,914	0	1,459	5,455	-	-	-	-	-	-	-	70,200
5b.4	Subtotal Period 5b Period-Dependent Costs	-	7,880	-	-	-	-	22,639	4,632	36,151	0	5,038	31,119	-	-	-	-	-	-	-	267,798
5b.0	TOTAL PERIOD 5b COST	-	37,251	-	-	-	-	27,422	9,605	74,278	116	5,952	68,210	-	-	-	-	-	-	268,147	268,465

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt, Lbs.	Craft Manhours	Utility and Contractor Manhours
PERIOD 5c - Fuel Storage Operations/Shipping																					
Period 5c Collateral Costs																					
5c.2.1	Spent Fuel Capital and Transfor	-	-	-	-	-	-	958	144	1,102	-	1,102	-	-	-	-	-	-	-	-	-
5c.2	Subtotal Period 5c Collateral Costs	-	-	-	-	-	-	958	144	1,102	-	1,102	-	-	-	-	-	-	-	-	-
Period 5c Period-Dependent Costs																					
5c.4.1	Insurance	-	-	-	-	-	-	743	74	817	-	817	-	-	-	-	-	-	-	-	-
5c.4.2	Property taxes	-	-	-	-	-	-	1,286	129	1,415	-	1,415	-	-	-	-	-	-	-	-	-
5c.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5c.4.4	NRC ISFSI Fees	-	-	-	-	-	-	701	70	771	-	771	-	-	-	-	-	-	-	-	-
5c.4.5	ISFSI Operating Costs	-	-	-	-	-	-	190	29	219	-	219	-	-	-	-	-	-	-	-	-
5c.4.6	Security Staff Cost	-	-	-	-	-	-	3,582	537	4,119	-	4,119	-	-	-	-	-	-	-	-	77,340
5c.4.7	Utility Staff Cost	-	-	-	-	-	-	1,814	272	2,087	-	2,087	-	-	-	-	-	-	-	-	20,079
5c.4	Subtotal Period 5c Period-Dependent Costs	-	-	-	-	-	-	8,316	1,111	9,427	-	9,427	-	-	-	-	-	-	-	-	97,419
5c.0	TOTAL PERIOD 5c COST	-	-	-	-	-	-	9,274	1,255	10,529	-	10,529	-	-	-	-	-	-	-	-	97,419
PERIOD 5d - GTCC shipping																					
Period 5d Direct Decommissioning Activities																					
Nuclear Steam Supply System Removal																					
5d.1.1.1	Vessel & Internals GTCC Disposal	-	-	1,000	-	-	10,532	-	1,830	13,362	13,362	-	-	-	-	-	-	2,061	401,974	-	-
5d.1.1	Totals	-	-	1,000	-	-	10,532	-	1,830	13,362	13,362	-	-	-	-	-	-	2,061	401,974	-	-
5d.1	Subtotal Period 5d Activity Costs	-	-	1,000	-	-	10,532	-	1,830	13,362	13,362	-	-	-	-	-	-	2,061	401,974	-	-
Period 5d Period-Dependent Costs																					
5d.4.1	Insurance	-	-	-	-	-	-	10	1	11	11	-	-	-	-	-	-	-	-	-	-
5d.4.2	Property taxes	-	-	-	-	-	-	17	2	19	19	-	-	-	-	-	-	-	-	-	-
5d.4.3	Plant energy budget	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5d.4.4	NRC ISFSI Fees	-	-	-	-	-	-	7	1	8	-	8	-	-	-	-	-	-	-	-	-
5d.4.5	ISFSI Operating Costs	-	-	-	-	-	-	8	0	8	-	8	-	-	-	-	-	-	-	-	-
5d.4.6	Security Staff Cost	-	-	-	-	-	-	48	7	55	55	-	-	-	-	-	-	-	-	-	1,037
5d.4.7	Utility Staff Cost	-	-	-	-	-	-	24	4	28	28	-	-	-	-	-	-	-	-	-	269
5d.4	Subtotal Period 5d Period-Dependent Costs	-	-	-	-	-	-	109	15	124	113	11	-	-	-	-	-	-	-	-	1,306
5d.0	TOTAL PERIOD 5d COST	-	-	1,000	-	-	10,532	109	1,844	13,485	13,475	11	-	-	-	-	-	2,061	401,974	-	1,306
PERIOD 5e - ISFSI Decontamination																					
Period 5e Additional Costs																					
5e.2.1	License Termination ISFSI	-	475	305	506	-	2,229	2,471	1,746	8,732	8,732	-	-	-	20,829	-	-	-	2,015,971	14,285	1,298
5e.2	Subtotal Period 5e Additional Costs	-	475	305	506	-	2,229	2,471	1,746	8,732	8,732	-	-	-	20,829	-	-	-	2,015,971	14,285	1,298
Period 5e Period-Dependent Costs																					
5e.4.1	Insurance	-	-	-	-	-	-	61	15	77	77	-	-	-	-	-	-	-	-	-	-
5e.4.2	Property taxes	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5e.4.3	Plant energy budget	-	-	-	-	-	-	8	2	10	10	-	-	-	-	-	-	-	-	-	-
5e.4.4	Security Staff Cost	-	-	-	-	-	-	117	29	146	146	-	-	-	-	-	-	-	-	-	2,479
5e.4.5	Utility Staff Cost	-	-	-	-	-	-	172	43	215	215	-	-	-	-	-	-	-	-	-	1,881
5e.4	Subtotal Period 5e Period-Dependent Costs	-	-	-	-	-	-	358	89	447	447	-	-	-	-	-	-	-	-	-	4,359
5e.0	TOTAL PERIOD 5e COST	-	475	305	506	-	2,229	2,829	1,836	9,179	9,179	-	-	-	20,829	-	-	-	2,015,971	14,285	5,657
PERIOD 5f - ISFSI Site Restoration																					
Period 5f Additional Costs																					
5f.2.1	Demolition and Site Restoration ISFSI	-	6,261	-	-	-	-	35	944	7,240	-	-	7,240	-	-	-	-	-	-	51,188	80
5f.2	Subtotal Period 5f Additional Costs	-	6,261	-	-	-	-	35	944	7,240	-	-	7,240	-	-	-	-	-	-	51,188	80
Period 5f Collateral Costs																					
5f.3.1	Small tool allowance	-	78	-	-	-	-	-	11	84	-	-	84	-	-	-	-	-	-	-	-
5f.3	Subtotal Period 5f Collateral Costs	-	78	-	-	-	-	-	11	84	-	-	84	-	-	-	-	-	-	-	-
Period 5f Period-Dependent Costs																					
5f.4.1	Insurance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5f.4.2	Property taxes	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5f.4.3	Plant energy budget	-	-	-	-	-	-	4	1	5	-	-	5	-	-	-	-	-	-	-	-

Table D-2
Comanche Peak Nuclear Power Plant Unit 2
SAFSTOR Decommissioning Cost Estimate
(Thousands of 2024 Dollars)

Activity Index	Activity Description	Decon Cost	Removal Cost	Packaging Costs	Transport Costs	Off-Site Processing Costs	LLRW Disposal Costs	Other Costs	Total Contingency	Total Costs	NRC Lic. Term. Costs	Spent Fuel Management Costs	Site Restoration Costs	Processed Volume Cu. Feet	Burial Volumes Class A Cu. Feet	Class B Cu. Feet	Class C Cu. Feet	GTCC Cu. Feet	Burial / Processed Wt., Lbs.	Craft Manhours	Utility and Contractor Manhours
Period 5f Period-Dependent Costs (continued)																					
5f.4.4	Security Staff Cost	-	-	-	-	-	-	58	9	67	-	-	67	-	-	-	-	-	-	-	1,239
5f.4.5	Utility Staff Cost	-	-	-	-	-	-	71	11	82	-	-	82	-	-	-	-	-	-	-	769
5f.4	Subtotal Period 5f Period-Dependent Costs	-	-	-	-	-	-	128	20	148	-	-	148	-	-	-	-	-	-	-	2,009
5f.0	TOTAL PERIOD 5f COST	-	6,234	-	-	-	-	168	975	7,477	-	-	7,477	-	-	-	-	-	-	51,188	2,089
PERIOD 5 TOTALS		-	44,060	1,305	506	-	13,761	39,802	15,516	114,950	22,770	16,492	75,688	-	20,329	-	-	2,061	2,417,945	333,620	374,931
TOTAL COST TO DECOMMISSION		13,624	133,823	25,931	8,633	-	69,048	793,688	180,482	1,225,228	870,287	269,570	85,372	-	439,251	501	537	2,061	27,598,820	1,488,627	7,062,080

TOTAL COST TO DECOMMISSION WITH 17.28% CONTINGENCY:	**$1,225,228**	**thousands of 2024 dollars**
TOTAL NRC LICENSE TERMINATION COST IS 71.03% OR:	**$870,287**	**thousands of 2024 dollars**
SPENT FUEL MANAGEMENT COST IS 22% OR:	**$269,570**	**thousands of 2024 dollars**
NON-NUCLEAR DEMOLITION COST IS 6.97% OR:	**$85,372**	**thousands of 2024 dollars**
TOTAL LOW-LEVEL RADIOACTIVE WASTE VOLUME BURIED (EXCLUDING GTCC):	**440,088**	**Cubic Feet**
TOTAL GREATER THAN CLASS C RADWASTE VOLUME GENERATED:	**2,061**	**Cubic Feet**
TOTAL SCRAP METAL REMOVED:	**95,151**	**Tons**
TOTAL CRAFT LABOR REQUIREMENTS:	**1,488,627**	**Man-hours**

End Notes:
n/a - indicates that this activity not charged as decommissioning expense
s - indicates that this activity performed by decommissioning staff
0 - indicates that this value is less than 0.5 but is non-zero
A cell containing " - " indicates a zero value

APPENDIX E

ISFSI DECOMMISSIONING

Tables **Page**

Table E
Comanche Peak Nuclear Power Plant
ISFSI Decommissioning Cost Estimate
(thousands of 2024 dollars)

Activity Description	Removal Costs	Packaging Costs	Transport Costs	LLRW Disposal Costs	Other Costs	Total Costs	Burial Volume Class A (cubic feet)	Craft Manhours	Oversight and Contractor Manhours
Decommissioning Contractor									
Planning (characterization, specs and procedures)	-	-	-	-	729	729	-	-	1,432
Decontamination (activated disposition)	950	610	1,011	6,458	-	9,029	40,657	6,964	-
License Termination (radiological surveys)	-	-	-	-	3,515	3,515	-	21,606	-
Subtotal	**950**	**610**	**1,011**	**6,458**	**4,243**	**13,273**	**40,657**	**28,570**	**1,432**
Supporting Costs									
NRC and NRC Contractor Fees and Costs	-	-	-	-	699	699	-	-	1,153
Insurance	-	-	-	-	122	122	-	-	-
Property taxes	-	-	-	-	-	-	-	-	-
Plant energy budget	-	-	-	-	16	16	-	-	-
Security Staff Cost	-	-	-	-	233	233	-	-	4,958
Utility Staff Cost	-	-	-	-	344	344	-	-	3,761
Subtotal	-	-	-	-	**1,414**	**1,414**	-	-	**9,872**
Total (w/o contingency)	**950**	**610**	**1,011**	**6,458**	**5,658**	**14,687**	**40,657**	**28,570**	**11,304**
Total (w/25% contingency)	**1,188**	**762**	**1,264**	**8,073**	**7,072**	**18,359**	-	-	-

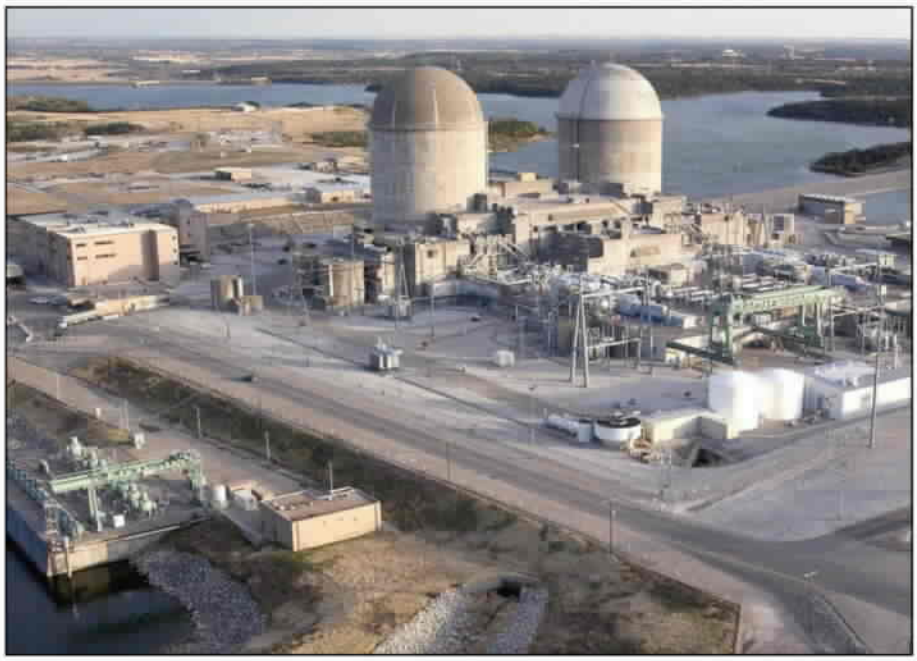
The application of contingency (25%) is consistent with the evaluation criteria referenced by the NRC in NUREG-1757 ("Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," U.S. NRC's Office of Nuclear Material Safety and Safeguards, NUREG-1757, Vol. 3, Rev. 1, February 2012)

Document V14-1846-002, Rev. 0

FINANCIAL ESCALATION ANALYSIS

for the

COMANCHE PEAK NUCLEAR POWER PLANT



prepared for

Comanche Peak Power Company LLC

prepared by

TLG Services, LLC
Bridgewater, Connecticut

April 2025

APPROVALS

Project Manager	Christopher R. Koriniskie	4/23/2025 Date
Project Engineer	Amara M.A. Falotico	4/23/2025 Date
Technical Manager	Adam M. Raczmarek	4/25/2025 Date

TABLE OF CONTENTS

REVISION LOG

Rev. No.	Date	Item Revised	Reason for Revision
0	04-25-2025		Original Issue

INTRODUCTION

This report presents the results of an escalation of the costs to decommission the Comanche Peak Nuclear Power Plant (Comanche Peak) to the projected year of expenditure. Financial schedules are provided for the baseline estimates, in which the nuclear units are expected to operate for 60 years. The baseline estimates (in 2024 dollars)[1] were adjusted for the required contingency ceiling and escalated using IHS Markit, Global Insight forecast information. A twenty-five year moving average was used for future years beyond the current forecast horizon of the IHS Markit, Global Insight database. A single value effective escalation rate (composite value) is also identified for each of the nuclear units. The results are summarized in Table 1.

Order of Operations

The process to escalate the decommissioning estimates was conducted in the following sequence:

- Source information was extracted from the latest decommissioning cost analyses (reproduced in Tables 2 and 3).
- The cost schedules were adjusted for the 10% ceiling value for contingency, as required by the Public Utility Commission of Texas' Substantive Rule §25.231(b)(1)(F)(i). The adjusted schedules are provided in Tables 4 and 5.
- The schedules of expenditures are presented in the following five categories: *Labor, Equipment and Materials, Energy, Waste Disposal,* and *Other*. The appropriate escalation index for each of the five escalation categories is identified, as summarized in Tables 6 and 7.
- The index values were applied against each of the unescalated schedules of expenditures to calculate a schedule of future value (Tables 8 and 9).
- An effective single value annual escalation rate was determined.

Escalation Factors

The escalation indices selected for *Labor, Equipment and Materials, Energy* and *Other* cost categories are identified in Table 6 and were provided by IHS Markit Global Economic Data via their online service. The indices used show the last update as 5 December 2024.

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1 "Decommissioning Cost Study for the Comanche Peak Nuclear Power Plant," Document No. V14-1846-001 Rev. 0, TLG Services, LLC, April 2025

When the decommissioning schedule extended beyond the forecast database, the escalation was determined using a twenty-five year moving average logic.

IHS Markit, Global Insight does not provide historical or projected costs for disposal of radioactive waste. As such, a TLG-developed LLRW Disposal/Recycling index was used in this escalation analysis. This index is a combination of historical information through 2024 from NRC publications for disposal site rates and projections using information provided by IHS Markit, Global Insight. A disposal agreement with Waste Control Specialists for disposal services includes a provision for the future adjustment in rates. The IHS Markit, Global Insight index (Consumer Price Index, All Items, All Urban) equivalent to the index identified in this agreement was used to escalate low-level radioactive waste disposal costs to the year of expenditure.

TABLE 1
ESCALATION SUMMARY
(millions of dollars)

Unit	Decommissioning Start	Decommissioning End	Baseline Cost (2024 $)	Adjusted Cost * (2024 $)	Escalated Value (Year of Expenditure $)	Effective Escalation Rate
60 Year Operating Life						
Unit 1	2050	2115	1,065.116	998.098	2,975.558	2.585%
Unit 2	2053	2115	1,089.873	1,018.280	3,126.496	2.568%

* Decommissioning costs adjusted for the 10% ceiling value required by Public Utility Commission of Texas' Substantive Rule 25.231(b)(1)(F)(i)

TABLE 2
UNIT 1, DECON ALTERNATIVE
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2050	60,213	2,746	2,492	15	10,173	75,639
2051	84,451	43,360	4,114	16,369	30,590	178,884
2052	77,599	53,501	2,650	38,114	16,794	188,657
2053	58,269	32,553	2,247	13,474	8,122	114,664
2054	50,542	24,134	2,086	3,565	4,639	84,966
2055	35,823	21,249	2,086	2,143	4,782	66,083
2056	8,269	430	2,092	10	5,010	15,812
2057	8,246	429	2,086	10	4,996	15,768
2058	10,580	3,345	1,493	1,787	4,979	22,185
2059	17,799	1,742	556	8	2,107	22,213
2060	16,023	7,217	324	2	1,313	24,880
2061	13,766	8,090	278	0	1,167	23,302
2062	4,109	1,576	44	0	1,133	6,862
2063	2,285	345	0	0	1,126	3,756
2064	2,290	345	0	0	1,129	3,765
2065	2,285	345	0	0	1,126	3,756
2066	2,285	345	0	0	1,126	3,756
2067	2,285	345	0	0	1,126	3,756
2068	2,290	345	0	0	1,129	3,765
2069	2,285	345	0	0	1,126	3,756
2070	2,285	345	0	0	1,126	3,756
2071	2,285	345	0	0	1,126	3,756
2072	2,290	345	0	0	1,129	3,765
2073	2,285	345	0	0	1,126	3,756
2074	2,285	345	0	0	1,126	3,756
2075	2,285	345	0	0	1,126	3,756
2076	2,290	345	0	0	1,129	3,765
2077	2,285	345	0	0	1,126	3,756
2078	2,285	345	0	0	1,126	3,756
2079	2,285	345	0	0	1,126	3,756

TABLE 2 (continued)
UNIT 1, DECON ALTERNATIVE
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2080	2,290	345	0	0	1,129	3,765
2081	2,285	345	0	0	1,126	3,756
2082	2,285	345	0	0	1,126	3,756
2083	2,285	345	0	0	1,126	3,756
2084	2,290	345	0	0	1,129	3,765
2085	2,285	345	0	0	1,126	3,756
2086	2,285	345	0	0	1,126	3,756
2087	2,285	345	0	0	1,126	3,756
2088	2,290	345	0	0	1,129	3,765
2089	2,285	345	0	0	1,126	3,756
2090	2,285	345	0	0	1,126	3,756
2091	2,285	345	0	0	1,126	3,756
2092	2,290	345	0	0	1,129	3,765
2093	2,285	345	0	0	1,126	3,756
2094	2,285	345	0	0	1,126	3,756
2095	2,285	345	0	0	1,126	3,756
2096	2,290	345	0	0	1,129	3,765
2097	2,285	345	0	0	1,126	3,756
2098	2,285	345	0	0	1,126	3,756
2099	2,285	345	0	0	1,126	3,756
2100	2,285	345	0	0	1,126	3,756
2101	2,285	345	0	0	1,126	3,756
2102	2,285	345	0	0	1,126	3,756
2103	2,285	345	0	0	1,126	3,756
2104	2,290	345	0	0	1,129	3,765
2105	2,285	345	0	0	1,126	3,756
2106	2,285	345	0	0	1,126	3,756
2107	2,285	345	0	0	1,126	3,756
2108	2,290	345	0	0	1,129	3,765
2109	2,285	345	0	0	1,126	3,756

TABLE 2 (continued)
UNIT 1, DECON ALTERNATIVE
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2110	2,285	345	0	0	1,126	3,756
2111	2,285	345	0	0	1,126	3,756
2112	2,290	345	0	0	1,129	3,765
2113	2,285	345	0	0	1,126	3,756
2114	2,227	1,423	0	0	13,235	16,885
2115	5,705	3,063	15	4,036	3,838	16,657
Total	570,203	222,453	22,565	79,535	170,360	1,065,116

TABLE 3
UNIT 2, DECON ALTERNATIVE
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2053	54,245	2,797	2,538	15	4,935	64,530
2054	73,254	26,010	4,112	14,441	19,242	137,059
2055	79,627	53,908	2,643	31,840	10,495	178,512
2056	70,516	34,805	2,245	13,179	5,626	126,371
2057	67,577	29,749	2,086	6,115	3,774	109,302
2058	61,375	32,637	1,681	6,483	5,205	107,382
2059	37,599	6,843	784	2,865	8,539	56,630
2060	20,356	14,136	324	2	3,870	38,688
2061	17,889	16,188	278	0	2,783	37,139
2062	4,764	2,863	44	0	1,390	9,061
2063	2,285	345	0	0	1,126	3,756
2064	2,290	345	0	0	1,129	3,765
2065	2,285	345	0	0	1,126	3,756
2066	2,285	345	0	0	1,126	3,756
2067	2,285	345	0	0	1,126	3,756
2068	2,290	345	0	0	1,129	3,765
2069	2,285	345	0	0	1,126	3,756
2070	2,285	345	0	0	1,126	3,756
2071	2,285	345	0	0	1,126	3,756
2072	2,290	345	0	0	1,129	3,765
2073	2,285	345	0	0	1,126	3,756
2074	2,285	345	0	0	1,126	3,756
2075	2,285	345	0	0	1,126	3,756
2076	2,290	345	0	0	1,129	3,765
2077	2,285	345	0	0	1,126	3,756
2078	2,285	345	0	0	1,126	3,756
2079	2,285	345	0	0	1,126	3,756
2080	2,290	345	0	0	1,129	3,765
2081	2,285	345	0	0	1,126	3,756
2082	2,285	345	0	0	1,126	3,756

TABLE 3 (continued)
UNIT 2, DECON ALTERNATIVE
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2083	2,285	345	0	0	1,126	3,756
2084	2,290	345	0	0	1,129	3,765
2085	2,285	345	0	0	1,126	3,756
2086	2,285	345	0	0	1,126	3,756
2087	2,285	345	0	0	1,126	3,756
2088	2,290	345	0	0	1,129	3,765
2089	2,285	345	0	0	1,126	3,756
2090	2,285	345	0	0	1,126	3,756
2091	2,285	345	0	0	1,126	3,756
2092	2,290	345	0	0	1,129	3,765
2093	2,285	345	0	0	1,126	3,756
2094	2,285	345	0	0	1,126	3,756
2095	2,285	345	0	0	1,126	3,756
2096	2,290	345	0	0	1,129	3,765
2097	2,285	345	0	0	1,126	3,756
2098	2,285	345	0	0	1,126	3,756
2099	2,285	345	0	0	1,126	3,756
2100	2,285	345	0	0	1,126	3,756
2101	2,285	345	0	0	1,126	3,756
2102	2,285	345	0	0	1,126	3,756
2103	2,285	345	0	0	1,126	3,756
2104	2,290	345	0	0	1,129	3,765
2105	2,285	345	0	0	1,126	3,756
2106	2,285	345	0	0	1,126	3,756
2107	2,285	345	0	0	1,126	3,756
2108	2,290	345	0	0	1,129	3,765
2109	2,285	345	0	0	1,126	3,756
2110	2,285	345	0	0	1,126	3,756
2111	2,285	345	0	0	1,126	3,756
2112	2,290	345	0	0	1,129	3,765

TABLE 3 (continued)
UNIT 2, DECON ALTERNATIVE
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2113	2,285	345	0	0	1,126	3,756
2114	2,227	1,423	0	0	13,235	16,885
2115	5,705	3,063	15	4,036	3,838	16,657
Total	611,715	242,017	16,749	78,976	140,415	1,089,873

TABLE 4
UNIT 1, DECON ALTERNATIVE, CONTINGENCY ADJUSTED*
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2050	56,875	2,563	2,354	14	9,769	71,575
2051	79,081	40,052	3,886	14,843	29,020	166,883
2052	72,114	48,952	2,503	34,537	15,931	174,037
2053	54,552	30,215	2,122	12,232	7,717	106,837
2054	47,533	22,684	1,971	3,262	4,418	79,868
2055	33,713	19,999	1,971	1,961	4,552	62,196
2056	7,811	394	1,976	9	4,768	14,958
2057	7,789	393	1,971	9	4,755	14,917
2058	9,872	3,073	1,411	1,636	4,735	20,727
2059	16,632	1,601	526	8	2,021	20,787
2060	15,086	6,805	306	2	1,261	23,460
2061	13,003	7,642	263	0	1,120	22,027
2062	3,881	1,488	42	0	1,088	6,499
2063	2,158	326	0	0	1,082	3,565
2064	2,164	326	0	0	1,085	3,574
2065	2,158	326	0	0	1,082	3,565
2066	2,158	326	0	0	1,082	3,565
2067	2,158	326	0	0	1,082	3,565
2068	2,164	326	0	0	1,085	3,574
2069	2,158	326	0	0	1,082	3,565
2070	2,158	326	0	0	1,082	3,565
2071	2,158	326	0	0	1,082	3,565
2072	2,164	326	0	0	1,085	3,574
2073	2,158	326	0	0	1,082	3,565
2074	2,158	326	0	0	1,082	3,565
2075	2,158	326	0	0	1,082	3,565
2076	2,164	326	0	0	1,085	3,574
2077	2,158	326	0	0	1,082	3,565
2078	2,158	326	0	0	1,082	3,565
2079	2,158	326	0	0	1,082	3,565

TABLE 4 (continued)
UNIT 1, DECON ALTERNATIVE, CONTINGENCY ADJUSTED*
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2080	2,164	326	0	0	1,085	3,574
2081	2,158	326	0	0	1,082	3,565
2082	2,158	326	0	0	1,082	3,565
2083	2,158	326	0	0	1,082	3,565
2084	2,164	326	0	0	1,085	3,574
2085	2,158	326	0	0	1,082	3,565
2086	2,158	326	0	0	1,082	3,565
2087	2,158	326	0	0	1,082	3,565
2088	2,164	326	0	0	1,085	3,574
2089	2,158	326	0	0	1,082	3,565
2090	2,158	326	0	0	1,082	3,565
2091	2,158	326	0	0	1,082	3,565
2092	2,164	326	0	0	1,085	3,574
2093	2,158	326	0	0	1,082	3,565
2094	2,158	326	0	0	1,082	3,565
2095	2,158	326	0	0	1,082	3,565
2096	2,164	326	0	0	1,085	3,574
2097	2,158	326	0	0	1,082	3,565
2098	2,158	326	0	0	1,082	3,565
2099	2,158	326	0	0	1,082	3,565
2100	2,158	326	0	0	1,082	3,565
2101	2,158	326	0	0	1,082	3,565
2102	2,158	326	0	0	1,082	3,565
2103	2,158	326	0	0	1,082	3,565
2104	2,164	326	0	0	1,085	3,574
2105	2,158	326	0	0	1,082	3,565
2106	2,158	326	0	0	1,082	3,565
2107	2,158	326	0	0	1,082	3,565
2108	2,164	326	0	0	1,085	3,574
2109	2,158	326	0	0	1,082	3,565

TABLE 4 (continued)
UNIT 1, DECON ALTERNATIVE, CONTINGENCY ADJUSTED*
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2110	2,158	326	0	0	1,082	3,565
2111	2,158	326	0	0	1,082	3,565
2112	2,164	326	0	0	1,085	3,574
2113	2,158	326	0	0	1,082	3,565
2114	2,104	1,307	0	0	12,519	15,929
2115	5,367	2,876	13	3,693	3,513	15,462
Total	535,532	206,664	21,314	72,206	162,383	998,098

* Decommissioning costs adjusted for the 10% ceiling value required by Public Utility Commission of Texas' Substantive Rule 25.231(b)(1)(F)(i)

TABLE 5
UNIT 2, DECON ALTERNATIVE, CONTINGENCY ADJUSTED*
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2053	51,160	2,605	2,394	14	4,728	60,901
2054	68,449	23,633	3,878	13,038	18,191	127,189
2055	73,812	49,183	2,493	28,718	9,894	164,100
2056	65,886	32,232	2,117	11,935	5,328	117,499
2057	63,368	27,865	1,968	5,581	3,592	102,374
2058	57,471	30,581	1,585	5,918	4,940	100,495
2059	34,942	6,312	739	2,615	8,082	52,690
2060	19,110	13,317	306	2	3,669	36,404
2061	16,872	15,267	262	0	2,643	35,045
2062	4,493	2,700	42	0	1,329	8,563
2063	2,155	325	0	0	1,080	3,560
2064	2,160	325	0	0	1,083	3,569
2065	2,155	325	0	0	1,080	3,560
2066	2,155	325	0	0	1,080	3,560
2067	2,155	325	0	0	1,080	3,560
2068	2,160	325	0	0	1,083	3,569
2069	2,155	325	0	0	1,080	3,560
2070	2,155	325	0	0	1,080	3,560
2071	2,155	325	0	0	1,080	3,560
2072	2,160	325	0	0	1,083	3,569
2073	2,155	325	0	0	1,080	3,560
2074	2,155	325	0	0	1,080	3,560
2075	2,155	325	0	0	1,080	3,560
2076	2,160	325	0	0	1,083	3,569
2077	2,155	325	0	0	1,080	3,560
2078	2,155	325	0	0	1,080	3,560
2079	2,155	325	0	0	1,080	3,560
2080	2,160	325	0	0	1,083	3,569
2081	2,155	325	0	0	1,080	3,560
2082	2,155	325	0	0	1,080	3,560

TABLE 5 (continued)
UNIT 2, DECON ALTERNATIVE, CONTINGENCY ADJUSTED*
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2083	2,155	325	0	0	1,080	3,560
2084	2,160	325	0	0	1,083	3,569
2085	2,155	325	0	0	1,080	3,560
2086	2,155	325	0	0	1,080	3,560
2087	2,155	325	0	0	1,080	3,560
2088	2,160	325	0	0	1,083	3,569
2089	2,155	325	0	0	1,080	3,560
2090	2,155	325	0	0	1,080	3,560
2091	2,155	325	0	0	1,080	3,560
2092	2,160	325	0	0	1,083	3,569
2093	2,155	325	0	0	1,080	3,560
2094	2,155	325	0	0	1,080	3,560
2095	2,155	325	0	0	1,080	3,560
2096	2,160	325	0	0	1,083	3,569
2097	2,155	325	0	0	1,080	3,560
2098	2,155	325	0	0	1,080	3,560
2099	2,155	325	0	0	1,080	3,560
2100	2,155	325	0	0	1,080	3,560
2101	2,155	325	0	0	1,080	3,560
2102	2,155	325	0	0	1,080	3,560
2103	2,155	325	0	0	1,080	3,560
2104	2,160	325	0	0	1,083	3,569
2105	2,155	325	0	0	1,080	3,560
2106	2,155	325	0	0	1,080	3,560
2107	2,155	325	0	0	1,080	3,560
2108	2,160	325	0	0	1,083	3,569
2109	2,155	325	0	0	1,080	3,560
2110	2,155	325	0	0	1,080	3,560
2111	2,155	325	0	0	1,080	3,560
2112	2,160	325	0	0	1,083	3,569

TABLE 5 (continued)
UNIT 2, DECON ALTERNATIVE, CONTINGENCY ADJUSTED*
TOTAL ANNUAL EXPENDITURES
(Thousands of 2024 Dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2113	2,155	325	0	0	1,080	3,560
2114	2,100	1,304	0	0	12,501	15,905
2115	5,359	2,871	13	3,684	3,504	15,431
Total	572,974	224,463	15,796	71,506	133,540	1,018,280

* Decommissioning costs adjusted for the 10% ceiling value required by Public Utility Commission of Texas' Substantive Rule 25.231(b)(1)(F)(i)

TABLE 6
ESCALATION BASES

Cost Category	Escalation Source
Labor	ECI Total Compensation, Private Industry Workers (ECIPCTNS)
Equipment and Materials	Producer Price Index, Machinery & Equipment (WPIP11)
Energy	Producer Price Index, Fuels and Related Products and Power (WPIP05)
Other	Consumer Price Index, Services (CUSASNS)
Low-Level Radioactive Waste	TLG-Developed LLRW Disposal Price Index [Historical data based upon Barnwell published tariffs; forecast data based upon the Consumer Price Index, All Items, All Urban – determined to be equivalent to the index identified in the waste disposal agreement with Waste Control Specialists]

TABLE 7
COMPONENT ESCALATION SUMMARY

	Escalated Costs ($ thousands)		Average Effective Escalation Rate	
	Unit 1	**Unit 2**	**Unit 1**	**Unit 2**
Labor	1,732,059	1,898,841	2.796%	2.797%
Equipment and Materials	323,762	362,535	1.297%	1.296%
Energy	41,390	31,829	2.238%	2.236%
Waste Disposal	153,129	160,982	2.192%	2.191%
Other	725,218	672,309	2.749%	2.748%
Total	2,975,558	3,126,496	2.585%	2.568%

Table 8
DECON Unit 1, Contingency Adjusted*
Decommissioning After 60 Year Operation

ESCALATION ANALYSIS OF CASHFLOWS

Source Documentation:	Decommissioning Cost Study for the Comanche Peak Nuclear Power Plant
Source Document Number:	V14-1846-001 Rev 0
	Tables 8.8,8.8a,8.8b,8.8c, Contingency Adjusted*
Unit Identification	Financial Escalation Analysis Comanche Peak Power Company. LLC Unit 1
Estimate basis year:	2024
Decommissioning Scenario	DECON
Operating Lifetime	Decommissioning After 60 Year Operation

Single Value Escalation % by Major Cost Categories

Single value escalations	Single-value	Total Costs	
Cost Category	Yearly Escal.	2024 $	Escalated $
Total Costs	2.583%	998,008	2,975,558
License Termination Costs	2.563%	636,818	1,481,900
Spent Fuel Management Costs	2.618%	309,118	1,321,116
Site Restoration Costs	2.419%	51,862	166,509
Labor Costs	2.796%	585,592	1,732,059
Equipment & Material Costs	1.297%	206,664	323,762
Energy Costs	2.288%	21,814	41,390
LLRW Disposal Costs	2.192%	72,206	153,129
Other Costs	2.749%	162,388	725,218

Financial Escalation Analysis Comanche Peak Power Company. LLC Unit 1
DECON, Contingency Adjusted - Decommissioning After 60 Year Operation
Total Costs - Thousands of Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2050	117,921	3,587	4,191	21	20,061	145,780
2051	168,593	56,774	7,081	26,690	61,215	320,350
2052	158,045	70,241	4,060	63,468	34,522	330,030
2053	122,878	13,896	4,009	22,969	17,178	210,960
2054	110,035	33,378	3,806	6,260	10,101	163,610
2055	80,196	29,807	3,920	3,845	10,691	128,459
2056	19,091	595	4,014	19	11,500	35,219
2057	19,561	601	4,085	19	11,778	36,044
2058	25,468	4,761	2,988	3,420	12,047	48,679
2059	44,079	2,512	1,133	16	5,279	53,019
2060	41,069	10,818	673	4	3,383	55,947
2061	36,360	12,306	589	0	3,080	52,311
2062	11,118	2,428	95	0	3,078	16,749
2063	6,307	538	0	0	3,111	10,049
2064	6,557	545	0	0	3,238	10,340
2065	6,718	553	0	0	3,317	10,588
2066	6,901	560	0	0	3,407	10,868
2067	7,090	567	0	0	3,499	11,156
2068	7,302	574	0	0	3,604	11,480
2069	7,482	582	0	0	3,691	11,755
2070	7,686	589	0	0	3,792	12,067
2071	7,897	597	0	0	3,894	12,388
2072	8,135	605	0	0	4,011	12,751
2073	8,336	613	0	0	4,108	13,057
2074	8,564	620	0	0	4,219	13,403
2075	8,799	628	0	0	4,334	13,761
2076	9,061	637	0	0	4,461	14,165
2077	9,288	645	0	0	4,572	14,505
2078	9,543	653	0	0	4,696	14,892
2079	9,804	662	0	0	4,824	15,290
2080	10,098	670	0	0	4,968	15,736
2081	10,347	679	0	0	5,089	16,115
2082	10,629	688	0	0	5,226	16,543
2083	10,919	697	0	0	5,368	16,984
2084	11,217	706	0	0	5,529	17,482
2085	11,521	715	0	0	5,663	17,902
2086	11,838	724	0	0	5,816	18,378
2087	12,101	734	0	0	5,971	18,809
2088	12,526	743	0	0	6,153	19,422
2089	12,835	753	0	0	6,302	19,890
2090	13,185	763	0	0	6,473	20,421
2091	13,545	772	0	0	6,648	20,965
2092	13,951	783	0	0	6,847	21,581
2093	14,295	793	0	0	7,014	22,102
2094	14,685	800	0	0	7,201	22,692
2095	15,086	813	0	0	7,309	23,208
2096	15,538	824	0	0	7,620	23,982
2097	15,921	835	0	0	7,805	24,561
2098	16,355	846	0	0	8,017	25,218
2099	16,802	857	0	0	8,234	25,893
2100	17,261	868	0	0	8,457	26,586
2101	17,732	879	0	0	8,687	27,298
2102	18,216	890	0	0	8,922	28,028
2103	18,713	902	0	0	9,164	28,779
2104	19,271	914	0	0	9,438	29,626
2105	19,719	926	0	0	9,667	30,312
2106	20,288	938	0	0	9,929	31,155
2107	20,812	950	0	0	10,198	31,960
2108	21,407	962	0	0	10,563	32,932
2109	21,996	975	0	0	10,758	33,720
2110	22,596	987	0	0	11,050	34,633
2111	23,213	1,000	0	0	11,349	35,562
2112	23,909	1,013	0	0	11,689	36,611
2113	24,498	1,026	0	0	11,973	37,497
2114	24,533	4,169	0	0	142,339	171,041
2115	64,305	9,250	88	26,392	41,020	141,098
Totals	1,732,060	323,702	41,390	153,129	725,218	2,975,558

Financial Escalation Analysis Comanche Peak Power Company. LLC Unit 1
DECON. Contingency Adjusted - Decommissioning After 60 Year Operation
License Termination Costs - Thousands of Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2050	116,510	3,587	4,191	21	17,963	142,271
2051	154,007	31,621	7,081	26,690	58,521	280,980
2052	113,788	17,713	1,963	63,468	31,357	290,980
2053	108,810	21,150	4,009	22,969	14,956	171,933
2054	95,810	10,379	3,806	6,260	8,242	124,533
2055	66,488	6,542	3,920	3,845	8,782	89,577
2056	19,091	595	4,014	19	9,534	33,253
2057	19,561	601	4,085	19	9,764	34,030
2058	23,823	4,761	2,988	3,420	10,768	45,760
2059	39,003	2,001	1,133	16	5,091	47,244
2060	10,638	518	187	4	824	12,171
2061	357	0	0	0	0	357
2062	68	0	0	0	0	68
2063	0	0	0	0	0	0
2064	0	0	0	0	0	0
2065	0	0	0	0	0	0
2066	0	0	0	0	0	0
2067	0	0	0	0	0	0
2068	0	0	0	0	0	0
2069	0	0	0	0	0	0
2070	0	0	0	0	0	0
2071	0	0	0	0	0	0
2072	0	0	0	0	0	0
2073	0	0	0	0	0	0
2074	0	0	0	0	0	0
2075	0	0	0	0	0	0
2076	0	0	0	0	0	0
2077	0	0	0	0	0	0
2078	0	0	0	0	0	0
2079	0	0	0	0	0	0
2080	0	0	0	0	0	0
2081	0	0	0	0	0	0
2082	0	0	0	0	0	0
2083	0	0	0	0	0	0
2084	0	0	0	0	0	0
2085	0	0	0	0	0	0
2086	0	0	0	0	0	0
2087	0	0	0	0	0	0
2088	0	0	0	0	0	0
2089	0	0	0	0	0	0
2090	0	0	0	0	0	0
2091	0	0	0	0	0	0
2092	0	0	0	0	0	0
2093	0	0	0	0	0	0
2094	0	0	0	0	0	0
2095	0	0	0	0	0	0
2096	0	0	0	0	0	0
2097	0	0	0	0	0	0
2098	0	0	0	0	0	0
2099	0	0	0	0	0	0
2100	0	0	0	0	0	0
2101	0	0	0	0	0	0
2102	0	0	0	0	0	0
2103	0	0	0	0	0	0
2104	0	0	0	0	0	0
2105	0	0	0	0	0	0
2106	0	0	0	0	0	0
2107	0	0	0	0	0	0
2108	0	0	0	0	0	0
2109	0	0	0	0	0	0
2110	0	0	0	0	0	0
2111	0	0	0	0	0	0
2112	0	0	0	0	0	0
2113	0	0	0	0	0	0
2114	917	3,649	0	0	130,398	134,964
2115	7,946	1,806	60	26,392	10,577	46,781
Totals	806,012	137,505	40,192	153,129	316,732	1,481,900

Financial Escalation Analysis Comanche Peak Power Company. LLC Unit 1
DECON. Contingency Adjusted - Decommissioning After 60 Year Operation
Spent Fuel Management Costs - Thousands of Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2050	0	0	0	0	2,131	2,131
2051	11,070	22,082	0	0	2,151	35,306
2052	11,380	22,353	0	0	1,766	35,499
2053	11,697	22,632	0	0	1,809	36,138
2054	12,021	22,922	0	0	1,858	36,801
2055	12,352	23,218	0	0	1,909	37,479
2056	0	0	0	0	1,966	1,966
2057	0	0	0	0	2,013	2,013
2058	1,645	0	0	0	1,283	2,928
2059	5,076	511	0	0	189	5,776
2060	5,893	518	0	0	1,852	8,263
2061	6,036	525	0	0	2,220	8,781
2062	6,109	532	0	0	2,968	9,609
2063	6,307	538	0	0	3,144	10,019
2064	6,557	545	0	0	3,208	10,310
2065	6,718	553	0	0	3,317	10,588
2066	6,901	560	0	0	3,407	10,868
2067	7,090	567	0	0	3,499	11,156
2068	7,302	574	0	0	3,604	11,480
2069	7,482	582	0	0	3,691	11,755
2070	7,686	589	0	0	3,792	12,067
2071	7,897	597	0	0	3,894	12,388
2072	8,135	605	0	0	4,011	12,751
2073	8,336	613	0	0	4,108	13,057
2074	8,564	620	0	0	4,219	13,403
2075	8,799	628	0	0	4,334	13,761
2076	9,061	637	0	0	4,464	14,165
2077	9,288	645	0	0	4,572	14,505
2078	9,543	653	0	0	4,696	14,892
2079	9,804	662	0	0	4,824	15,290
2080	10,098	670	0	0	4,968	15,736
2081	10,347	679	0	0	5,089	16,115
2082	10,629	688	0	0	5,226	16,543
2083	10,919	697	0	0	5,368	16,984
2084	11,217	706	0	0	5,529	17,482
2085	11,521	715	0	0	5,663	17,902
2086	11,838	724	0	0	5,816	18,378
2087	12,101	734	0	0	5,974	18,809
2088	12,526	743	0	0	6,153	19,422
2089	12,835	753	0	0	6,302	19,890
2090	13,185	763	0	0	6,473	20,421
2091	13,545	772	0	0	6,648	20,965
2092	13,951	783	0	0	6,847	21,581
2093	14,295	793	0	0	7,014	22,102
2094	14,685	803	0	0	7,204	22,692
2095	15,086	813	0	0	7,309	23,208
2096	15,538	824	0	0	7,620	23,982
2097	15,921	835	0	0	7,805	24,561
2098	16,355	846	0	0	8,017	25,218
2099	16,802	857	0	0	8,234	25,893
2100	17,261	868	0	0	8,457	26,586
2101	17,732	879	0	0	8,687	27,298
2102	18,216	890	0	0	8,922	28,028
2103	18,713	902	0	0	9,164	28,779
2104	19,271	911	0	0	9,438	29,620
2105	19,719	926	0	0	9,667	30,312
2106	20,288	938	0	0	9,929	31,155
2107	20,812	950	0	0	10,198	31,960
2108	21,407	962	0	0	10,563	32,932
2109	21,996	975	0	0	10,758	33,720
2110	22,596	987	0	0	11,050	34,633
2111	23,213	1,000	0	0	11,349	35,562
2112	23,909	1,013	0	0	11,689	36,611
2113	24,498	1,026	0	0	11,973	37,497
2114	23,616	520	0	0	11,940	36,076
2115	0	0	0	0	0	0
Totals	795,750	154,409	0	0	373,978	1,321,116

Financial Escalation Analysis Comanche Peak Power Company. LLC Unit 1
DECON, Contingency Adjusted - Decommissioning After 60 Year Operation
Site Restoration Costs - Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2050	1,375	0	0	0	0	1,375
2051	3,456	69	0	0	536	4,061
2052	2,876	175	0	0	1,399	4,450
2053	2,372	105	0	0	112	2,589
2054	2,198	77	0	0	0	2,275
2055	1,355	47	0	0	0	1,402
2056	0	0	0	0	0	0
2057	0	0	0	0	0	0
2058	0	0	0	0	0	0
2059	0	0	0	0	0	0
2060	24,638	9,782	486	0	707	35,613
2061	20,067	11,781	589	0	863	33,300
2062	4,941	1,896	95	0	141	7,073
2063	0	0	0	0	0	0
2064	0	0	0	0	0	0
2065	0	0	0	0	0	0
2066	0	0	0	0	0	0
2067	0	0	0	0	0	0
2068	0	0	0	0	0	0
2069	0	0	0	0	0	0
2070	0	0	0	0	0	0
2071	0	0	0	0	0	0
2072	0	0	0	0	0	0
2073	0	0	0	0	0	0
2074	0	0	0	0	0	0
2075	0	0	0	0	0	0
2076	0	0	0	0	0	0
2077	0	0	0	0	0	0
2078	0	0	0	0	0	0
2079	0	0	0	0	0	0
2080	0	0	0	0	0	0
2081	0	0	0	0	0	0
2082	0	0	0	0	0	0
2083	0	0	0	0	0	0
2084	0	0	0	0	0	0
2085	0	0	0	0	0	0
2086	0	0	0	0	0	0
2087	0	0	0	0	0	0
2088	0	0	0	0	0	0
2089	0	0	0	0	0	0
2090	0	0	0	0	0	0
2091	0	0	0	0	0	0
2092	0	0	0	0	0	0
2093	0	0	0	0	0	0
2094	0	0	0	0	0	0
2095	0	0	0	0	0	0
2096	0	0	0	0	0	0
2097	0	0	0	0	0	0
2098	0	0	0	0	0	0
2099	0	0	0	0	0	0
2100	0	0	0	0	0	0
2101	0	0	0	0	0	0
2102	0	0	0	0	0	0
2103	0	0	0	0	0	0
2104	0	0	0	0	0	0
2105	0	0	0	0	0	0
2106	0	0	0	0	0	0
2107	0	0	0	0	0	0
2108	0	0	0	0	0	0
2109	0	0	0	0	0	0
2110	0	0	0	0	0	0
2111	0	0	0	0	0	0
2112	0	0	0	0	0	0
2113	0	0	0	0	0	0
2114	0	0	0	0	0	0
2115	56,359	7,487	28	0	114	64,018
Totals	130,387	31,419	1,198	0	1,505	166,509

* Decommissioning costs adjusted for the 10% ceiling value required by Public Utility Commission of Texas' Substantive Rule 25.231(b)(1)(F)(i)

Comanche Peak Nuclear Power Plant
Financial Escalation Analysis

Table 9
DECON Unit 2, Contingency Adjusted*
Decommissioning After 60 Year Operation

ESCALATION ANALYSIS OF CASHFLOWS

Source Documentation:	Decommissioning Cost Study for the Comanche Peak Nuclear Power Plant
Source Document Number:	V14-1846-001 Rev 0
	Tables 8.4,8.4a,8.4b,8.4c, Contingency Adjusted*
Unit Identification	Financial Escalation Analysis Comanche Peak Power Company, LLC Unit 2
Estimate basis year:	2024
Decommissioning Scenario:	DECON
Operating Lifetime	Decommissioning After 60 Year Operation

Single Value Escalation % by Major Cost Categories

Single value escalations	Single-value	Total Costs	
Cost Category	Yearly Escal.	2024 $	Escalated $
Total Costs	2.568%	1,018,280	3,126,496
License Termination Costs	2.550%	641,714	1,588,059
Spent Fuel Management Costs	2.610%	296,954	1,312,214
Site Restoration Costs	2.851%	79,582	226,224
Labor Costs	2.797%	572,974	1,898,841
Equipment & Material Costs	1.296%	224,463	362,535
Energy Costs	2.286%	15,796	31,829
LLRW Disposal Costs	2.191%	71,506	160,982
Other Costs	2.748%	133,540	672,309

Financial Escalation Analysis Comanche Peak Power Company, LLC Unit 2
DECON, Contingency Adjusted - Decommissioning After 60 Year Operation
Total Costs - Thousands of Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2053	112,230	3,781	1,556	26	10,525	131,130
2054	158,453	34,773	7,547	25,019	41,593	267,385
2055	175,581	70,300	4,957	56,307	23,236	333,387
2056	161,030	16,057	4,300	23,912	12,852	250,700
2057	150,120	12,612	4,079	11,425	8,897	220,112
2058	148,263	47,372	3,358	12,375	12,567	223,930
2059	92,613	9,904	1,594	5,586	21,117	130,814
2060	52,024	21,169	672	4	9,846	83,715
2061	47,179	24,585	588	0	7,289	79,636
2062	12,906	4,404	95	0	3,761	21,166
2063	6,357	538	0	0	3,141	10,036
2064	6,547	545	0	0	3,235	10,327
2065	6,708	552	0	0	3,313	10,573
2066	6,891	559	0	0	3,403	10,853
2067	7,079	566	0	0	3,495	11,140
2068	7,201	574	0	0	3,600	11,105
2069	7,471	581	0	0	3,687	11,739
2070	7,675	589	0	0	3,787	12,051
2071	7,885	596	0	0	3,890	12,371
2072	8,122	604	0	0	4,006	12,732
2073	8,323	612	0	0	4,104	13,039
2074	8,551	619	0	0	4,215	13,385
2075	8,786	627	0	0	4,330	13,713
2076	9,050	636	0	0	4,459	14,115
2077	9,271	644	0	0	4,567	14,485
2078	9,528	652	0	0	4,691	14,871
2079	9,789	661	0	0	4,818	15,268
2080	10,083	669	0	0	4,963	15,715
2081	10,331	678	0	0	5,083	16,092
2082	10,613	687	0	0	5,221	16,521
2083	10,903	696	0	0	5,362	16,961
2084	11,229	705	0	0	5,523	17,457
2085	11,506	714	0	0	5,657	17,877
2086	11,820	723	0	0	5,810	18,353
2087	12,113	732	0	0	5,968	18,813
2088	12,507	742	0	0	6,146	19,395
2089	12,815	752	0	0	6,295	19,862
2090	13,165	761	0	0	6,466	20,392
2091	13,524	771	0	0	6,641	20,936
2092	13,930	781	0	0	6,840	21,551
2093	14,273	791	0	0	7,006	22,070
2094	14,663	802	0	0	7,196	22,661
2095	15,063	812	0	0	7,391	23,266
2096	15,511	823	0	0	7,612	23,946
2097	15,897	833	0	0	7,797	24,527
2098	16,331	844	0	0	8,008	25,183
2099	16,776	855	0	0	8,225	25,856
2100	17,231	866	0	0	8,448	26,518
2101	17,705	878	0	0	8,677	27,260
2102	18,188	889	0	0	8,912	27,989
2103	18,685	901	0	0	9,154	28,740
2104	19,245	912	0	0	9,428	29,585
2105	19,719	924	0	0	9,657	30,300
2106	20,257	936	0	0	9,918	31,111
2107	20,810	948	0	0	10,157	31,915
2108	21,431	961	0	0	10,492	32,887
2109	21,962	973	0	0	10,747	33,682
2110	22,562	986	0	0	11,038	34,586
2111	23,178	999	0	0	11,337	35,511
2112	23,873	1,012	0	0	11,676	36,561
2113	24,461	1,025	0	0	11,960	37,446
2114	24,496	4,159	0	0	142,128	170,783
2115	64,200	9,277	88	26,828	40,922	140,815
Totals	1,898,841	362,535	31,829	160,982	672,309	3,126,496

Financial Escalation Analysis Comanche Peak Power Company, LLC Unit 2
DECON, Contingency Adjusted - Decommissioning After 60 Year Operation
License Termination Costs - Thousands of Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2053	111,580	3,781	1,556	26	8,175	131,130
2054	155,853	31,683	7,547	25,019	38,606	261,708
2055	150,107	10,900	1,967	56,307	19,821	290,452
2056	113,868	21,351	1,300	23,912	10,104	206,805
2057	139,537	11,600	1,079	11,425	6,887	170,528
2058	125,665	15,698	3,358	12,375	11,286	168,317
2059	86,656	9,394	1,594	5,586	20,929	124,159
2060	12,568	674	187	4	3,849	17,282
2061	158	0	0	0	0	158
2062	25	0	0	0	0	25
2063	0	0	0	0	0	0
2064	0	0	0	0	0	0
2065	0	0	0	0	0	0
2066	0	0	0	0	0	0
2067	0	0	0	0	0	0
2068	0	0	0	0	0	0
2069	0	0	0	0	0	0
2070	0	0	0	0	0	0
2071	0	0	0	0	0	0
2072	0	0	0	0	0	0
2073	0	0	0	0	0	0
2074	0	0	0	0	0	0
2075	0	0	0	0	0	0
2076	0	0	0	0	0	0
2077	0	0	0	0	0	0
2078	0	0	0	0	0	0
2079	0	0	0	0	0	0
2080	0	0	0	0	0	0
2081	0	0	0	0	0	0
2082	0	0	0	0	0	0
2083	0	0	0	0	0	0
2084	0	0	0	0	0	0
2085	0	0	0	0	0	0
2086	0	0	0	0	0	0
2087	0	0	0	0	0	0
2088	0	0	0	0	0	0
2089	0	0	0	0	0	0
2090	0	0	0	0	0	0
2091	0	0	0	0	0	0
2092	0	0	0	0	0	0
2093	0	0	0	0	0	0
2094	0	0	0	0	0	0
2095	0	0	0	0	0	0
2096	0	0	0	0	0	0
2097	0	0	0	0	0	0
2098	0	0	0	0	0	0
2099	0	0	0	0	0	0
2100	0	0	0	0	0	0
2101	0	0	0	0	0	0
2102	0	0	0	0	0	0
2103	0	0	0	0	0	0
2104	0	0	0	0	0	0
2105	0	0	0	0	0	0
2106	0	0	0	0	0	0
2107	0	0	0	0	0	0
2108	0	0	0	0	0	0
2109	0	0	0	0	0	0
2110	0	0	0	0	0	0
2111	0	0	0	0	0	0
2112	0	0	0	0	0	0
2113	0	0	0	0	0	0
2114	915	3,640	0	0	180,200	184,755
2115	7,927	1,802	59	26,828	40,479	76,595
Totals	947,223	158,466	30,632	160,982	290,756	1,588,059

Financial Escalation Analysis Comanche Peak Power Company, LLC Unit 2
DECON, Contingency Adjusted - Decommissioning After 60 Year Operation
Spent Fuel Management Costs - Thousands of Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2053	0	0	0	0	2,350	2,350
2054	0	0	0	0	2,319	2,319
2055	12,331	23,182	0	0	1,906	37,422
2056	13,008	21,101	0	0	1,963	36,072
2057	15,221	27,812	0	0	2,011	45,047
2058	19,946	31,616	0	0	1,281	52,843
2059	5,913	511	0	0	188	6,612
2060	5,884	517	0	0	1,850	8,251
2061	6,027	524	0	0	2,221	8,772
2062	6,139	531	0	0	2,984	9,654
2063	6,357	538	0	0	3,141	10,036
2064	6,547	545	0	0	3,235	10,327
2065	6,708	552	0	0	3,313	10,573
2066	6,891	559	0	0	3,403	10,853
2067	7,079	566	0	0	3,495	11,140
2068	7,201	574	0	0	3,600	11,105
2069	7,471	581	0	0	3,687	11,739
2070	7,675	589	0	0	3,787	12,051
2071	7,885	596	0	0	3,890	12,371
2072	8,122	604	0	0	4,006	12,732
2073	8,323	612	0	0	4,104	13,039
2074	8,551	619	0	0	4,215	13,385
2075	8,786	627	0	0	4,330	13,713
2076	9,050	636	0	0	4,459	14,115
2077	9,271	644	0	0	4,567	14,485
2078	9,528	652	0	0	4,691	14,871
2079	9,789	661	0	0	4,818	15,268
2080	10,083	669	0	0	4,963	15,715
2081	10,331	678	0	0	5,083	16,092
2082	10,613	687	0	0	5,221	16,521
2083	10,903	696	0	0	5,362	16,961
2084	11,229	705	0	0	5,523	17,457
2085	11,506	714	0	0	5,657	17,877
2086	11,820	723	0	0	5,810	18,353
2087	12,113	732	0	0	5,968	18,813
2088	12,507	742	0	0	6,146	19,395
2089	12,815	752	0	0	6,295	19,862
2090	13,165	761	0	0	6,466	20,392
2091	13,524	771	0	0	6,641	20,936
2092	13,930	781	0	0	6,840	21,551
2093	14,273	791	0	0	7,006	22,070
2094	14,663	802	0	0	7,196	22,661
2095	15,063	812	0	0	7,391	23,266
2096	15,511	823	0	0	7,612	23,946
2097	15,897	833	0	0	7,797	24,527
2098	16,331	844	0	0	8,008	25,183
2099	16,776	855	0	0	8,225	25,856
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2102	18,188	889	0	0	8,912	27,989
2103	18,685	901	0	0	9,154	28,740
2104	19,245	912	0	0	9,428	29,585
2105	19,719	924	0	0	9,657	30,300
2106	20,257	936	0	0	9,918	31,111
2107	20,810	948	0	0	10,157	31,915
2108	21,431	961	0	0	10,492	32,887
2109	21,962	973	0	0	10,747	33,682
2110	22,562	986	0	0	11,038	34,586
2111	23,178	999	0	0	11,337	35,511
2112	23,873	1,012	0	0	11,676	36,561
2113	24,461	1,025	0	0	11,960	37,446
2114	23,581	519	0	0	11,928	36,028
2115	0	0	0	0	0	0
Totals	795,882	147,849	0	0	368,533	1,312,214

Financial Escalation Analysis Comanche Peak Power Company, LLC Unit 2
DECON, Contingency Adjusted - Decommissioning After 60 Year Operation
Site Restoration Costs - Year of Expenditure Dollars

Year	Labor	Equipment & Materials	Energy	LLRW Disposal	Other	Yearly Totals
2053	650	0	0	0	0	650
2054	2,600	90	0	0	608	3,298
2055	3,783	221	0	0	1,509	5,513
2056	1,163	205	0	0	125	1,793
2057	1,308	199	0	0	0	1,507
2058	2,652	118	0	0	0	2,770
2059	34	0	0	0	0	34
2060	33,573	19,978	485	0	4,147	58,182
2061	40,999	24,061	588	0	5,063	70,711
2062	6,692	3,873	95	0	826	11,486
2063	0	0	0	0	0	0
2064	0	0	0	0	0	0
2065	0	0	0	0	0	0
2066	0	0	0	0	0	0
2067	0	0	0	0	0	0
2068	0	0	0	0	0	0
2069	0	0	0	0	0	0
2070	0	0	0	0	0	0
2071	0	0	0	0	0	0
2072	0	0	0	0	0	0
2073	0	0	0	0	0	0
2074	0	0	0	0	0	0
2075	0	0	0	0	0	0
2076	0	0	0	0	0	0
2077	0	0	0	0	0	0
2078	0	0	0	0	0	0
2079	0	0	0	0	0	0
2080	0	0	0	0	0	0
2081	0	0	0	0	0	0
2082	0	0	0	0	0	0
2083	0	0	0	0	0	0
2084	0	0	0	0	0	0
2085	0	0	0	0	0	0
2086	0	0	0	0	0	0
2087	0	0	0	0	0	0
2088	0	0	0	0	0	0
2089	0	0	0	0	0	0
2090	0	0	0	0	0	0
2091	0	0	0	0	0	0
2092	0	0	0	0	0	0
2093	0	0	0	0	0	0
2094	0	0	0	0	0	0
2095	0	0	0	0	0	0
2096	0	0	0	0	0	0
2097	0	0	0	0	0	0
2098	0	0	0	0	0	0
2099	0	0	0	0	0	0
2100	0	0	0	0	0	0
2101	0	0	0	0	0	0
2102	0	0	0	0	0	0
2103	0	0	0	0	0	0
2104	0	0	0	0	0	0
2105	0	0	0	0	0	0
2106	0	0	0	0	0	0
2107	0	0	0	0	0	0
2108	0	0	0	0	0	0
2109	0	0	0	0	0	0
2110	0	0	0	0	0	0
2111	0	0	0	0	0	0
2112	0	0	0	0	0	0
2113	0	0	0	0	0	0
2114	0	0	0	0	0	0
2115	56,273	7,476	28	0	443	64,220
Totals	155,786	56,221	1,196	0	13,021	226,224

* Decommissioning costs adjusted for the 10% ceiling value required by Public Utility Commission of Texas' Substantive Rule 25.231(b)(1)(F)(i)

Direct Testimony of William M. Quinn

DOCKET NO. 58193

APPLICATION OF COMANCHE PEAK POWER COMPANY LLC FOR REVIEW OF NUCLEAR DECOMMISSIONING COST STUDY AND FUNDING ANALYSIS UNDER 16 TAC § 25.303(f)(2)	§ § § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS

Direct Testimony of

William M. Quinn

on Behalf of

Comanche Peak Power Company LLC

June 6, 2025

INDEX TO THE DIRECT TESTIMONY

OF WILLIAM M. QUINN, WITNESS FOR

COMANCHE PEAK POWER COMPANY LLC

EXHIBITS

DIRECT TESTIMONY OF WILLIAM M. QUINN

I. POSITION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is William (Bill) M. Quinn. My business address is 6555 Sierra Drive, Irving, Texas 75039.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am Senior Vice President & Treasurer of Vistra Corp. (Vistra) and its subsidiaries, including Comanche Peak Power Company LLC (Comanche Peak or Company), the owner of Comanche Peak Nuclear Power Plant (CPNPP) as well as its associated Nuclear Decommissioning Fund (NDF).

Q. PLEASE OUTLINE YOUR EDUCATIONAL QUALIFICATIONS AND PROFESSIONAL EXPERIENCE.

A. I have an undergraduate degree in Accounting from Texas A&M University and an MS degree in Information Systems, also from Texas A&M University. I have been employed at Vistra (and the associated predecessor and subsidiary company TXU Energy) since 2008. Prior to joining TXU Energy, I was consultant with Ernst & Young and Arthur Andersen for over 7 years.

Q. WHAT ARE THE PRIMARY RESPONSIBILITIES OF YOUR POSITION AS SENIOR VICE PRESIDENT AND TREASURER?

A. I am accountable for all treasury-related activities for Vistra and its subsidiaries. In doing so, I consult and work closely with the Vistra Chief Financial Officer to 1) develop general financial strategies, 2) direct the financing activities of Vistra and its subsidiaries in order to assure the availability of adequate funds, access to capital, proper capitalization and credit rating and efficient funding for the Companies' business activities, 3) ensure the adequate and proper communication and the accurate and timely disclosure of financial information regarding Vistra to credit rating agencies and commercial banks, 4) direct the overall cash management

activities of Vistra and its subsidiaries, 5) manage Vistra's interest rate risks, 6) ensure financial and legal compliance with all of the terms, conditions and covenants of the Companies' financing arrangements, and 7) direct the management of Vistra's insurance portfolio. As Treasurer, I serve on Vistra's Officer Leadership Team, Risk Committee and the Retirement Plan Committee, and I serve as chairman of the Thrift Committee and the Nuclear Decommissioning Trust Committee.

II. PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to demonstrate that the Company (a Transferee Company pursuant to Public Utility Commission of Texas (PUCT) Substantive Rule 25.303(c)(2) (16 Tex. Admin. Code (TAC) § 25.303(c)(2)), is in compliance with the PUCT rules related to the Comanche Peak Decommissioning Trust (Trust).

Q. WHAT IS THE PURPOSE OF ANNUAL FUNDING OF THE DECOMMISSIONING TRUST?

A. The purpose of funding an external trust is to ensure that adequate funds are available to pay for the safe dismantlement of the facility at the end of the useful life of both generating units and to comply with the U.S. Nuclear Regulatory Commission (NRC) and PUCT requirements. This funding of future costs allocates the expense of retiring the plants to the customers who are receiving the benefits of its generation during its useful life. Excess funding, if any, will be returned to ratepayers after the completion of the plant's decommissioning or as otherwise allowed by NRC and PUCT guidelines.

III. COMANCHE PEAK DECOMMISSIONING

A. Funding Requirements

Q. WHAT AMOUNT IS BEING REQUESTED FOR DECOMMISSIONING EXPENSE IN THIS FILING?

A. Comanche Peak's current annual funding amount approved in Docket No. 50945 is $20,077,165, which is being collected by Oncor Electric Delivery Company LLC (Oncor), the Collecting Utility.[1] Comanche Peak proposes to reduce the annual funding amount to $0.

The *z*, prepared by TLG Services, LLC (TLG) dated April 2025 (Decommissioning Study) (attached as Exhibit AMK-1 to the direct testimony of Mr. Adam M. Kaczmarek) and *Financial Escalation Analysis for the Comanche Peak Nuclear Power Plant* (Financial Escalation Analysis), prepared by TLG in April 2025 (attached as Exhibit AMK-2 to the direct testimony of Mr. Kaczmarek), estimate the total cost to decommission and completely dismantle CPNPP at $2,016,377,779 in 2024 dollars assuming a 10 percent contingency. As of December 31, 2024, the Net After-Tax Value of the trusts for CPNPP Units 1 and 2 was $2,012,754,964, with $984,842,075 for Unit 1 and $1,027,912,888 for Unit 2. Based on the results of the Decommissioning Study and Financial Escalation Analysis, Comanche Peak performed a *Funding Analysis for Comanche Peak Nuclear Power Plant* (Funding Analysis) in May 2025, which is attached to this testimony as Exhibit WMQ-1.

On July 30, 2024, the NRC renewed and extended the Facility Operating License for CPNPP Unit 1 to 2050 and Unit 2 to 2053. As a result of the license extension, the Funding Analysis shows the current NDF is sufficient to cover the total cost to decommission and completely dismantle

[1] 16 TAC § 25.303(c)(3).

CPNPP. Comanche Peak proposes to reduce the current collection rate to $0 for the next five years.

B. Compliance with PUCT Rules

Q. ARE THERE SPECIFIC GUIDELINES FOR THE ESTABLISHMENT AND FUNDING OF DECOMMISSIONING TRUSTS RELATED TO NUCLEAR POWER PLANTS SUCH AS COMANCHE PEAK?

A. Yes. The NRC has established guidelines to ensure the adequacy of funds for the safe dismantlement, decontamination, and disposal of the generating units at the end of their useful lives. These guidelines apply to both the amounts of fund contributions and the methods for funding for the ultimate decommissioning of the units. The PUCT has also adopted rules establishing certain requirements for nuclear decommissioning trusts.

Q. WHAT DOES THE PUCT'S SUBSTANTIVE RULE SPECIFY CONCERNING THE MANAGEMENT OF THE DECOMMISSIONING TRUST?

A. In general terms, 16 TAC § 25.303 specifies Comanche Peak's duties as a Transferee Company in the selection of trustees and managers of decommissioning trust funds, outlines what must be contained in the agreements between Comanche Peak and these parties, and limits what investments may be included in the portfolios of decommissioning trusts.

Q. HAS COMANCHE PEAK FOLLOWED THE GUIDELINES ADOPTED BY THE PUCT IN THE SELECTION OF THE TRUSTEE AND MANAGER OF THE COMANCHE PEAK NDF?

A. Yes. The Bank of New York Mellon has served as trustee for the NDF since its inception in 1990. Dresdner RCM Global Investors, who has served as the fixed income investment manager since the fund's inception in 1990 was merged into Pacific Investment Management Company (PIMCO) in 2002. In 1994, after rule changes allowed for equity investments, Mellon's

Nuclear Decommissioning Trust Stock Index Fund (now DT DV Stock Index Fund) was first used to manage the equity investments in the trust. This commingled equity fund was selected after developing an investment strategy, evaluating alternatives, and conducting a search. In 1998, after additional changes in the Commission's investment rules and a new manager search, Northern Trust Quantitative Advisors (now Northern Trust Investments, Inc.) was hired to manage an additional separate account S&P 500 index fund. In 2017, the Northern Trust Investments account was assigned to their Tax Advantaged Equity team, with responsibility for both S&P 500 index and MSCI EAFE index separate accounts, thus diversifying equity investments to include some non-U.S. developed markets. In 2019, NISA Investment Advisors ("NISA"), LLC was hired as a second fixed income separate account manager, to complement and diversify from the fixed income management of PIMCO. In 2021, after adoption of the most recent investment policy, NISA was hired to manage a Treasury Inflation-Protected Securities (TIPS) portfolio to further diversify the fixed income allocation and provide additional hedging of the inflationary exposure in future decommissioning costs. Performance for the investment managers is reviewed quarterly, and the trustee is reviewed every few years, with formal reviews for the investment managers and the trustee occurring as needed.

Q. HAS COMANCHE PEAK COMPLIED WITH THE PUCT'S GUIDELINES CONCERNING THE MANAGER AND INVESTMENT AGREEMENTS?

A. Yes. Comanche Peak complied with those guidelines in the original agreements, and subsequent amendments, which have all been filed with the PUCT, most recently in Docket No. 45753.

Q. DOES THE MANAGEMENT AGREEMENT ADDRESS THE INVESTMENT RESTRICTIONS SET FORTH IN 16 TAC § 25.303(e)(3)?

A. Yes, it does. The fund managers and trustee have been instructed to follow the guidelines set forth in 16 TAC § 25.303, which limit the types of securities that may be purchased and which also limit the equity securities that can be held by the Trust.

Q. DOES COMANCHE PEAK HAVE AN INVESTMENT POLICY THAT ENSURES COMPLIANCE WITH THE INVESTMENT GUIDELINES IN 16 TAC § 25.303(e)?

A. Yes. Attached as Exhibit WMQ-2 is a copy of Comanche Peak's Nuclear Decommissioning Trust Investment Policy that became effective October 1, 2021.

Q. HOW HAS COMANCHE PEAK HISTORICALLY MADE CONTRIBUTIONS TO THE NDF?

A. Historically, contributions to the NDF have been made monthly based on billings during the previous month by Oncor, through Rider NDC - Nuclear Decommissioning Charges. The NDF receives the contribution from Oncor through the billing process previously described to the Commission in 2005 in Docket No. 31252 (see Horton Testimony, pp. 8-9) and Order No. 2 approving the filing; in 2015 in Docket No. 44845 (see Frenzel Testimony, pp. 10-11) and approved by order of the Commission on November 6, 2015; and in 2021 in Docket No. 50945 (see Moldovan Testimony, pp. 8-10) and approved by order of the Commission on January 29, 2021.

Q. WHAT FUNDING METHOD IS COMANCHE PEAK PROPOSING IN THIS FILING, AND DOES IT COMPLY WITH THE PUCT'S GUIDELINES?

A. Based on the results of the Decommissioning Study, the Financial Escalation Analysis, and Funding Analysis, Comanche Peak is proposing to reduce the current customer collection to $0 for the next five years. The fund balances are included on page 2 of Funding Analysis. The current

funding amounts are based on a 1997 decommissioning study that was updated and redetermined in 2000 for use in the TXU Electric Company unbundled cost of service proceeding. The decommissioning study was subsequently updated in 2005, 2010, 2015, 2020, and now, with this filing, in 2025.

A review of decommissioning expense must be performed every five years as required by 16 TAC § 25.303(f)(2). Thus, Comanche Peak's filing in this docket accomplishes its requirement to further update the decommissioning cost study and funding analysis. These periodic reviews are required to assure the adequacy of funds for the new technologies, decommissioning requirements, and other assumptions that may change over time. Comanche Peak is also in compliance with 16 TAC § 25.303(c)(4), which requires the Trust to be irrevocable and external.

Q. WHAT EFFORTS DOES COMANCHE PEAK TAKE TO ACHIEVE OPTIMUM TAX EFFICIENCY AS DEFINED IN 16 TAC § 25.303(e)(3)(B)(iii)?

A. All decommissioning funds are invested in tax-qualified nuclear decommissioning trusts, as called for under 16 TAC § 25.303(e)(3)(B)(iii). In addition, Comanche Peak works with investment managers to achieve tax efficiency within the management of the NDF assets, as follows: (1) all managers are made aware of the taxable nature of qualified decommissioning trusts and invest accordingly, and they are evaluated on both a pre-tax and after tax basis; (2) rebalancing and other transaction activity is done thoughtfully so as to reduce realized taxable gains where possible, within the guidance provided by the Investment Policy; and (3) investment manager Northern Trust Investments, through their Tax Advantaged Equity team, makes trades explicitly for tax efficiency purposes (e.g., capturing tax losses to offset gains elsewhere in the portfolio) and assists in overall tax gain/loss positioning across the NDF.

C. Assumed Escalation Rate

Q. WHEN WILL DECOMMISSIONING FOR CPNPP BEGIN, AND HOW LONG WILL IT LAST?

A. Comanche Peak's original operating license for CPNPP Units 1 and 2 was for 40 years. Commercial operation began in 1990 and 1993 for Units 1 and 2, respectively. As stated above, the NRC recently renewed and extended the licenses for both units. Therefore, for CPNPP Unit 1, the 2025 decommissioning cost study projects that commercial operations will cease and decommissioning expenditures will begin in 2050. For CPNPP Unit 2, the study projects that commercial operations will cease and decommissioning expenditures will begin in 2053.

Q. HOW WERE THE COSTS USED TO DETERMINE THE FUNDING LEVELS DEVELOPED?

A. As previously mentioned, the current funding amounts are based on a 1997 decommissioning study that was updated and re-determined in 2000 for use in the TXU Electric Company unbundled cost of service proceeding. The decommissioning study was subsequently updated previously in 2005, 2010, 2015, and 2020. The 2025 update to the decommissioning costs was developed by TLG, the same industry expert that performed the previous studies.

D. Trust Balance and Administration Cost

Q. WHAT IS THE CURRENT BALANCE IN THE NUCLEAR DECOMMISSIONING TRUST?

A. The balance in the Trust at December 31, 2024 is shown on page 2 of the Funding Analysis. Since the income and capital gains realized by the trust are taxed at 20 percent, it is necessary to adjust the balance for the current tax liability on the unrealized gains. The current tax liability is calculated by multiplying the tax rate of 20 percent times the difference between the

market value and the tax cost of the assets in each trust. The net after-tax value of the trust, which is the market value less the tax liability, is $984,842,075 for Unit 1 and $1,027,912,888 for Unit 2. While the Trust has certain tax advantages, the income and capital gains obtained by the Trust are only tax-deferred, not tax exempt. Failure to reduce the balances to reflect the taxes owed on the income and capital gains realized by the Trust will result in the Trust having inadequate funds to meet the cost of decommissioning Comanche Peak.

Q. HOW WERE THE PROJECTED FEES AND ADMINISTRATION EXPENSES DETERMINED?

A. The actual total annual fees and administration expenses incurred by the trust are shown on page 3 of the Funding Analysis. This was used as the basis to forecast fees and administration expenses. Several factors influence these expenses and must be considered in forecasting future expenses. First, there is a timing issue, as most of the expenses are paid in arrears on a quarterly basis. Another significant factor is the allocation between active managers and passive managers. The cost for active managers is generally higher than for passive managers. At present, our equity segment is passively managed and our fixed income segment is actively managed. This allocation is expected to remain the same until the equity allocation is reduced in later years, at which time the additional allocations to cash should keep the fees relatively stable. Normal expenses were developed from an analysis of full-year expenses from the ten-year period 2015 to 2024. The average of the actual expenses over this ten-year period was 0.17 percent of NDF assets, which was used for the pre-tax expense.

E. Assumed Net Investment Return

Q. WHAT NET INVESTMENT RETURNS (GROSS RETURN LESS EXPENSES, FEES AND TAXES) WERE USED IN YOUR ANALYSIS?

A. Net investment returns after expenses, fees, and taxes, which vary based upon asset allocation are detailed on pages 12-14 of the Funding Analysis based on the time periods corresponding to stipulated portfolio composition limits in 16 TAC § 25.303(e)(3)(B)(vi).

Q. PLEASE SUMMARIZE HOW THE NET INVESTMENT RETURNS WERE DETERMINED.

A. The net investment return for each year was derived in three stages. First, the long-term expected pre-tax gross investment return was determined for equity, fixed income, and cash. Next, the expected rate for fees, administration expenses and taxes was determined. Finally, asset allocation was established for different time periods during the NDF's life. The net investment return for the portfolio for each time period was determined by subtracting the expected rate for fees, administration expenses, and taxes from the combined equity, fixed income, and cash returns and weighting each asset class's return.

Q. HOW WERE THE FORECASTED INVESTMENT RETURNS FOR EACH ASSET CLASS DEVELOPED?

A. Forecasted investment returns for each asset class were sourced from JP Morgan and from Aon Investments as shown on page 4 of the Funding Analysis. Comanche Peak averaged the forecasted returns from these sources to derive the forecasted returns for each asset class. Pages 12-14 of the Funding Analysis show the calculation of the projected returns.

Q. HOW DID YOU DETERMINE THE PORTFOLIO INVESTMENT MIX?

A. The portfolio investment mix between equity, fixed income, and cash was developed by considering the liability of the trust, diversification,

preservation of assets, and the applicable provisions of the 16 TAC § 25.303(e). Equity returns are significantly higher than the fixed income and cash returns, so based on the future liabilities, the equity exposure should be at the maximum permitted exposure, especially early in the life of the trust when there is sufficient time to recover from any market downturns. Pursuant to the restrictions of 16 TAC § 25.303(e), Comanche Peak currently targets 60 percent of the NDF assets to be allocated to equity securities. In the early years, there will be very little cash, and any expenses can be covered with residual cash exposure while new contributions and dividends are being invested or through shorter term fixed income investments. Once decommissioning starts, Comanche Peak will allocate funds to cash based upon the requirements of 16 TAC § 25.303 and projected decommissioning expenditures as shown on pages 12-14 of the Funding Analysis. The remainder of the NDF (approximately 40 percent prior to the start of decommissioning) is invested in fixed income securities.

Q. WHEN DO YOU EXPECT TO REDUCE THE EQUITY EXPOSURE, AND WHY?

A. While a large allocation to equity investments is appropriate for long-term liabilities, as payment of decommissioning expenses draws closer, the volatility of equities requires a reduction in the equity exposure to preserve capital. 16 TAC § 25.303(e)(3)(B)(vi) limits the equity exposure to 30 percent in years in which decommissioning expenditures occur. For Unit 1, this trigger point is now reached in 2050, as shown on page 12 of the Funding Analysis. Beginning in 2048, Comanche Peak assumed an orderly three-year transition from 60 percent equity to 30 percent equity, adjusting the equity allocation by an average 10 percent each year to reach the required level by 2050. As shown on page 13 of the Funding Analysis, the second equity balance trigger point is reached in 2111, when the Weighted Average Life of the NDF reaches 2.5 years and no equity investments are

allowed under 16 TAC § 25.303. Again, Comanche Peak assumed an orderly three-year transition from 30 percent equity to 0 percent equity beginning in 2109, adjusting the equity allocation by an average 10 percent each year to reach the required level by 2111.

Q. HOW DID YOU DETERMINE THE ALLOCATION TO CASH WITHIN THE FIXED INCOME ALLOCATION?

A. During the collection period no cash is required as most cash needs can be covered with contributions and income. As decommissioning expenditures begin, the duration of the fixed income portfolio is shortened by adding a cash allocation. Pages 12-14 of the Funding Analysis shows the expenditures from the Trust each year compared to the Trust balance, and a calculation of the average during different time periods. To maintain sufficient liquid assets to meet the expected cash flow requirements, the cash component within the fixed income allocation for the period was assumed to be the percent required each year. Cash includes any fixed income security with a maturity of less than one year, and these levels are consistent with Comanche Peak's investment strategy.

Q. PLEASE SUMMARIZE COMANCHE PEAK'S PORTFOLIO INVESTMENT MIX FOR EACH OF THE THREE TIME PERIODS YOU HAVE DISCUSSED?

A. The investment mix used in calculating the net investment returns detailed on pages 12-14 of the Funding Analysis are as follows:

- 60 percent Equities, 40 percent Fixed Income in 2024 through 2047, then ramping down to 30 percent equity by 2050;
- 30 percent Equities, Cash in the percent required to meet expenditures for the year, and the remainder in Fixed Income in 2050 through 2108, then ramping down to 0 percent equity by 2111; and
- The percent required to meet expenditures in Cash and the remainder in Fixed Income for 2111 and thereafter.

Q. WHAT OTHER COSTS WERE INCLUDED IN THE FORECAST OF INVESTMENT RETURNS?

A. Federal income taxes must also be included. The current federal income tax rate of 20 percent is assumed to remain constant during the life of the trust. Additionally, it is assumed there will be no state income tax.

Q. WHAT ACTIONS WILL COMANCHE PEAK TAKE IN THE FUTURE TO ASSURE THE ADEQUACY OF THE DECOMMISSIONING FUNDING AMOUNTS?

A. The funding amounts being reported in this case have been carefully and thoughtfully derived. Nevertheless, of necessity, assumptions have been made regarding future economic conditions, including inflation rates, investment performance, investment alternatives, tax rates, and timing of expenditures. Furthermore, future changes in technology and regulatory requirements can impact the decommissioning cost itself. Periodic reviews of all assumptions and cost estimates, in light of experienced and expected conditions, will therefore be conducted at least every five years throughout Comanche Peak's operating life, as required by 16 TAC § 25.303(f)(2). When appropriate, Comanche Peak will request adjustments to the funding amount to recognize needed changes.

Q. ARE ANY OF THE DECOMMISSIONING FUNDS DEPOSITED IN "NON-QUALIFIED" ACCOUNTS?

A. No.

F. Decommissioning Funding Plan

Q. PLEASE DESCRIBE THE FUNDING PLAN USED TO DERIVE THE EXPENSE LEVELS REQUESTED.

A. The funding plan shown on pages 19-24 of the Funding Analysis uses the assumptions described previously, and projects the Trust investments and expenditures from January 1, 2025, through December 31, 2115, on an

annual basis. The annual calculations for each unit are shown on pages 19-24. Column (B) shows the funding levels (contributions to the trust) based on the proposed $0 collection rate through 2115. Column (C) indicates the expected earnings of the fund based on the net investment return discussed earlier in my testimony. The investment return percentage is applied to the ending balance of the prior period plus one half the current period contributions, less the current period decommissioning outlays. Column (E) is the resulting balance of the fund at the end of each time period, taking into consideration fund contributions, earnings, and decommissioning expenditures. At the end of the assumed decommissioning period, the Trust balance, or the sum of all contributions and earnings less expenditures nets to zero, for each unit.

Q. PLEASE SUMMARIZE YOUR DECOMMISSIONING FUNDING TESTIMONY.

A. Utilizing the assumptions detailed earlier, the latest site-specific update for Comanche Peak decommissioning, and the PUCT's 10 percent contingency limitation, a decommissioning expense of $0 per year, shown on page 25 of the Funding Analysis, is appropriate and reasonable. Thus, a change to Oncor's Rider NDC – Nuclear Decommissioning Charge is necessary.

IV. CONCLUSION

Q. ARE THE COMANCHE PEAK NUCLEAR DECOMMISSIONING TRUST FUNDS INVESTED PRUDENTLY AND IN COMPLIANCE WITH 16 TAC § 25.303(e)?

A. Yes. The agreements, practices, and policy I described in this testimony ensure Comanche Peak's compliance with 16 TAC § 25.303(e).

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Comanche Peak's proposed costs of nuclear decommissioning are reasonable. These costs have been developed in compliance with the PUCT's rules and utilizing sound investment principles. The annual funding requirements have been calculated using reasonable projections as to investment returns, inflation levels, and administrative costs and fees. Collections from the current Rider NDC are not currently projected to be necessary in order to ensure annual funding requirements that have been calculated by Comanche Peak, such that a reduction to $0 of the collection rate is necessary at this time.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

Comanche Peak Power Company LLC

Funding Analysis

for

Comanche Peak Nuclear Power Plant

Nuclear Decommissioning Trust
2025

COMANCHE PEAK POWER COMPANY LLC
HISTORIC ASSETS & FEES AND FORECAST MARKET ASSUMPTIONS
2025 Funding Analysis

I. BEGINNING BALANCE FOR CP1 AND CP2

Line	December 31, 2024	CP 1	CP 2	Total
1	Market Value	$ 1,098,563,327	$ 1,150,470,223	$ 2,249,033,550
2	Tax Cost to Trust	$ 529,957,068	$ 537,683,550	$ 1,067,640,619
3	Taxable Gain (Line 1 - Line 2)	$ 568,606,258	$ 612,786,673	$ 1,181,392,931
4	Current Tax liability on Gain (Line 3 * 20% tax rate)	$ 113,721,252	$ 122,557,335	$ 236,278,586
5	Market Value (Line 1)	$ 1,098,563,327	$ 1,150,470,223	$ 2,249,033,550
6	Less tax due on the gains (Line 4)	$ (113,721,252)	$ (122,557,335)	$ (236,278,586)
7	**Net After-Tax Value (Line 5 - Line 6)**	**$ 984,842,075**	**$ 1,027,912,888**	**$ 2,012,754,964**

NOTES: (Section 1, Part I)
Source: BNY Mellon Trust Statements

CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
HISTORIC ASSETS & FEES AND FORECAST MARKET ASSUMPTIONS
2025 Funding Analysis

II. ANNUAL ADMINISTRATIVE FEES AND EXPENSES - CP1 AND CP2
(Qualified & Non-Qualified Trusts for Years 1990 through 2024)

Line	Year	Total Fees & Expenses (A)	After-Tax Fund Accumulation (B)	Total Fees & Expenses (C)	Cumulative Average (D)	
0	1990	$ -	$ 2,692,810			
1	1991	63,011	12,027,168	2.3400%	2.3400%	
2	1992	68,248	21,938,028	0.5674%	1.4537%	
3	1993	72,680	35,384,304	0.3313%	1.0796%	
4	1994	137,200	54,498,992	0.3877%	0.9066%	
5	1995	157,686	85,640,823	0.2893%	0.7831%	
6	1996	230,398	113,357,508	0.2690%	0.6975%	
7	1997	268,106	152,218,016	0.2365%	0.6316%	
8	1998	411,554	198,212,817	0.2704%	0.5865%	
9	1999	360,497	236,580,092	0.1819%	0.5415%	
10	2000	428,491	251,966,537	0.1811%	0.5055%	
11	2001	497,961	264,792,098	0.1976%	0.4775%	
12	2002	703,708	260,881,442	0.2658%	0.4598%	
13	2003	736,915	311,625,106	0.2825%	0.4462%	
14	2004	696,090	346,568,619	0.2234%	0.4303%	
15	2005	710,142	373,699,075	0.2049%	0.4153%	
16	2006	741,938	424,867,663	0.1985%	0.4017%	
17	2007	729,487	458,904,241	0.1717%	0.3882%	
18	2008	801,677	385,153,952	0.1747%	0.3763%	
19	2009	745,464	460,901,056	0.1935%	0.3667%	
20	2010	943,790	515,612,651	0.2048%	0.3586%	
21	2011	938,635	551,817,706	0.1820%	0.3502%	
22	2012	928,159	621,538,919	0.1682%	0.3419%	
23	2013	369,200	737,409,484	0.0594%	0.3296%	
24	2014	1,951,004	827,285,193	0.2646%	0.3269%	
25	2015	1,284,926	854,877,095	0.1553%	0.3201%	
26	2016	1,432,847	938,026,084	0.1676%	0.3142%	
27	2017	1,814,560	1,087,543,749	0.1934%	0.3097%	
28	2018	1,937,855	1,080,584,463	0.1782%	0.3050%	**0.17% Average over the last 10 years.**
29	2019	1,854,543	1,316,460,673	0.1716%	0.3004%	
30	2020	2,183,082	1,507,517,547	0.1658%	0.2959%	
31	2021	3,057,522	1,753,180,796	0.2028%	0.2929%	
32	2022	2,557,706	1,515,940,248	0.1459%	0.2883%	
33	2023	2,610,018	1,766,849,201	0.1722%	0.2848%	
34	2024	2,925,892	2,012,754,964	0.1656%	0.2813%	
35	Avg Annual	1,039,735.11	633,429,891	**0.16%**	**0.28%**	(Average over last 29 years.)
36	Avg Annual				**0.17%**	(Average over last 10 years.)

NOTES: (Section 1, Part II)

(A) Total Fees & Expenses reported by BNY Mellon, as custodian
Payments each year include some amounts for previous year accruals
(B) Net After-Tax Fund Accumulation is the Market Value less tax liability.
(C) Fee as a percentage of the After Tax Accumulation at the beginning of the year.
(D) Simple cumulative average of column (C)

CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
HISTORIC ASSETS & FEES AND FORECAST MARKET ASSUMPTIONS
2025 Funding Analysis

III. FORECAST LONG-TERM CAPITAL MARKET ASSUMPTIONS

Line	Forecast (A)	Rates (B)
1	**Long-term Capital Market Return Assumptions**	
2	**Equity**	**6.85%**
3	**Fixed Income (Bonds)**	**4.80%**
4	**Cash**	**3.70%**
5	**Federal Income Tax Rate**	**20.0%**
6	**Month to begin proposed collections in 2025** The contribution will occur in the following month	**9**

NOTES: (Section 1, Part II)
Assumption Sources:
Lines 1-4 Average of two forecasts:
(A) JP Morgan Long-Term Capital Market Return Assumptions, 2025 Edition
(B) Aon Hewitt Long-Term Capital Market Assumptions (30 Years) - 12/31/24
Line 5 Based on the current Federal Income Tax rate of 20% with no State Income Tax.
Line 6 Timing assumption for initial collections based on this Funding Analysis

COMANCHE PEAK POWER COMPANY LLC
HISTORIC ASSETS & FEES AND FORECAST MARKET ASSUMPTIONS
2025 Funding Analysis

IV. ANNUAL CONTRIBUTION COLLECTIONS - CP1 AND CP2

(Collections deposited in the Trust each year)

Line	Year	CP 1 (A)	CP 2 (B)	Total (C)
1	2020	$ 13,986,331	$ 7,919,791	$ 21,906,122
2	2021	16,009,736	6,133,474	22,143,210
3	2022	16,903,661	6,476,230	23,379,891
4	2023	16,835,453	6,450,097	23,285,550
5	2024	16,786,460	6,431,327	23,217,788
6	Avg Annual	16,104,328	6,682,184	22,786,512

NOTES: (Section 1, Part IV)

(A) & (B) & (C) Nuclear Decommissioning Collections deposited in the Trust each year
Reported in the annual Status of Nuclear Decommissioning Funds -
Transferee Company Annual Report by Luminant Generation Company LLC
Contributions determined in accordance with approved 2020 Funding Analysis

CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

I. WEIGHTED AVERAGE LIFE - CP1

Line (A)	Year (B)	Spending (C)	Remaining Life (D)	Dollars to go (E)	Time Weighting (F)	Weighted Avg Life (G)	Trigger Points (H)
1	2024	-	91.5	2,975,558,000			
2	2025	-	90.5	2,975,558,000	0.00	70.8	
3	2026	-	89.5	2,975,558,000	0.00	70.8	
4	2027	-	88.5	2,975,558,000	0.00	70.8	
5	2028	-	87.5	2,975,558,000	0.00	70.8	
6	2029	-	86.5	2,975,558,000	0.00	70.8	
7	2030	-	85.5	2,975,558,000	0.00	70.8	
8	2031	-	84.5	2,975,558,000	0.00	70.8	
9	2032	-	83.5	2,975,558,000	0.00	70.8	
10	2033	-	82.5	2,975,558,000	0.00	70.8	
11	2034	-	81.5	2,975,558,000	0.00	70.8	
12	2035	-	80.5	2,975,558,000	0.00	70.8	
13	2036	-	79.5	2,975,558,000	0.00	70.8	
14	2037	-	78.5	2,975,558,000	0.00	70.8	
15	2038	-	77.5	2,975,558,000	0.00	70.8	
16	2039	-	76.5	2,975,558,000	0.00	70.8	
17	2040	-	75.5	2,975,558,000	0.00	70.8	
18	2041	-	74.5	2,975,558,000	0.00	70.8	
19	2042	-	73.5	2,975,558,000	0.00	70.8	
20	2043	-	72.5	2,975,558,000	0.00	70.8	
21	2044	-	71.5	2,975,558,000	0.00	70.8	
22	2045	-	70.5	2,975,558,000	0.00	70.8	
23	2046	-	69.5	2,975,558,000	0.00	70.8	
24	2047	-	68.5	2,975,558,000	0.00	70.8	
25	2048	-	67.5	2,975,558,000	0.00	70.8	
26	2049	-	66.5	2,975,558,000	0.00	70.8	
27	2050	145,780,000	65.5	2,829,778,000	3.21	70.8	Trigger Point: Equity limited to 30% at license expiration. (2050 for Unit #1)
28	2051	320,356,000	64.5	2,509,422,000	7.30	67.6	
29	2052	330,939,000	63.5	2,178,483,000	8.37	60.3	
30	2053	210,960,000	62.5	1,967,523,000	6.05	51.9	
31	2054	163,610,000	61.5	1,803,913,000	5.11	45.8	
32	2055	128,459,000	60.5	1,675,454,000	4.31	40.7	
33	2056	35,219,000	59.5	1,640,235,000	1.25	36.4	
34	2057	36,044,000	58.5	1,604,191,000	1.29	35.2	
35	2058	48,679,000	57.5	1,555,512,000	1.74	33.9	
36	2059	53,019,000	56.5	1,502,493,000	1.93	32.1	
37	2060	55,947,000	55.5	1,446,546,000	2.07	30.2	
38	2061	52,341,000	54.5	1,394,205,000	1.97	28.1	
39	2062	16,749,000	53.5	1,377,456,000	0.64	26.2	
40	2063	10,049,000	52.5	1,367,407,000	0.38	25.5	
41	2064	10,340,000	51.5	1,357,067,000	0.39	25.1	
42	2065	10,588,000	50.5	1,346,479,000	0.39	24.7	
43	2066	10,868,000	49.5	1,335,611,000	0.40	24.4	
44	2067	11,156,000	48.5	1,324,455,000	0.41	24.0	
45	2068	11,480,000	47.5	1,312,975,000	0.41	23.5	

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

I. WEIGHTED AVERAGE LIFE - CP1

Line (A)	Year (B)	Spending (C)	Remaining Life (D)	Dollars to go (E)	Time Weighting (F)	Weighted Avg Life (G)	Trigger Points (H)
46	2069	11,755,000	46.5	1,301,220,000	0.42	23.1	
47	2070	12,067,000	45.5	1,289,153,000	0.42	22.7	
48	2071	12,388,000	44.5	1,276,765,000	0.43	22.3	
49	2072	12,751,000	43.5	1,264,014,000	0.43	21.9	
50	2073	13,057,000	42.5	1,250,957,000	0.44	21.4	
51	2074	13,403,000	41.5	1,237,554,000	0.44	21.0	
52	2075	13,761,000	40.5	1,223,793,000	0.45	20.6	
53	2076	14,165,000	39.5	1,209,628,000	0.46	20.1	
54	2077	14,505,000	38.5	1,195,123,000	0.46	19.6	
55	2078	14,892,000	37.5	1,180,231,000	0.47	19.2	
56	2079	15,290,000	36.5	1,164,941,000	0.47	18.7	
57	2080	15,736,000	35.5	1,149,205,000	0.48	18.2	
58	2081	16,115,000	34.5	1,133,090,000	0.48	17.8	
59	2082	16,543,000	33.5	1,116,547,000	0.49	17.3	
60	2083	16,984,000	32.5	1,099,563,000	0.49	16.8	
61	2084	17,482,000	31.5	1,082,081,000	0.50	16.3	
62	2085	17,902,000	30.5	1,064,179,000	0.50	15.8	
63	2086	18,378,000	29.5	1,045,801,000	0.51	15.3	
64	2087	18,869,000	28.5	1,026,932,000	0.51	14.8	
65	2088	19,422,000	27.5	1,007,510,000	0.52	14.3	
66	2089	19,890,000	26.5	987,620,000	0.52	13.7	
67	2090	20,421,000	25.5	967,199,000	0.53	13.2	
68	2091	20,965,000	24.5	946,234,000	0.53	12.7	
69	2092	21,581,000	23.5	924,653,000	0.54	12.2	
70	2093	22,102,000	22.5	902,551,000	0.54	11.6	
71	2094	22,692,000	21.5	879,859,000	0.54	11.1	
72	2095	23,298,000	20.5	856,561,000	0.54	10.6	
73	2096	23,982,000	19.5	832,579,000	0.55	10.0	
74	2097	24,561,000	18.5	808,018,000	0.55	9.5	
75	2098	25,218,000	17.5	782,800,000	0.55	8.9	
76	2099	25,893,000	16.5	756,907,000	0.55	8.4	
77	2100	26,586,000	15.5	730,321,000	0.54	7.8	
78	2101	27,298,000	14.5	703,023,000	0.54	7.3	
79	2102	28,028,000	13.5	674,995,000	0.54	6.7	
80	2103	28,779,000	12.5	646,216,000	0.53	6.2	
81	2104	29,626,000	11.5	616,590,000	0.53	5.7	
82	2105	30,342,000	10.5	586,248,000	0.52	5.1	
83	2106	31,155,000	9.5	555,093,000	0.50	4.6	
84	2107	31,990,000	8.5	523,103,000	0.49	4.1	
85	2108	32,932,000	7.5	490,171,000	0.47	3.6	
86	2109	33,729,000	6.5	456,442,000	0.45	3.2	
87	2110	34,633,000	5.5	421,809,000	0.42	2.7	
88	2111	35,562,000	4.5	386,247,000	0.38	2.3	
89	2112	36,611,000	3.5	349,636,000	0.33	1.9	
90	2113	37,497,000	2.5	312,139,000	0.27	1.6	
91	2114	171,041,000	1.5	141,098,000	0.82	1.3	
92	2115	141,098,000	0.5	-	0.50	0.5	
93							
94	Total	**$ 2,975,558,000**					

Trigger Point: Equity limited to 0% when the Weighted Average Life reaches two and a half years, which occurs in 2111 for Unit #1.

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

I. WEIGHTED AVERAGE LIFE - CP1

Line (A)	Year (B)	Spending (C)	Remaining Life (D)	Dollars to go (E)	Time Weighting (F)	Weighted Avg Life (G)	Trigger Points (H)

NOTES: (See subsequent pages)

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

II. WEIGHTED AVERAGE LIFE - CP2

Line (A)	Year (B)	Spending (C)	Remaining Life (D)	Dollars to go (E)	Time Weighting (F)	Weighted Avg Life (G)	Trigger Points (H)
1	2024	-	91.5	3,126,496,000			
2	2025	-	90.5	3,126,496,000	0.00	71.3	
3	2026	-	89.5	3,126,496,000	0.00	71.3	
4	2027	-	88.5	3,126,496,000	0.00	71.3	
5	2028	-	87.5	3,126,496,000	0.00	71.3	
6	2029	-	86.5	3,126,496,000	0.00	71.3	
7	2030	-	85.5	3,126,496,000	0.00	71.3	
8	2031	-	84.5	3,126,496,000	0.00	71.3	
9	2032	-	83.5	3,126,496,000	0.00	71.3	
10	2033	-	82.5	3,126,496,000	0.00	71.3	
11	2034	-	81.5	3,126,496,000	0.00	71.3	
12	2035	-	80.5	3,126,496,000	0.00	71.3	
13	2036	-	79.5	3,126,496,000	0.00	71.3	
14	2037	-	78.5	3,126,496,000	0.00	71.3	
15	2038	-	77.5	3,126,496,000	0.00	71.3	
16	2039	-	76.5	3,126,496,000	0.00	71.3	
17	2040	-	75.5	3,126,496,000	0.00	71.3	
18	2041	-	74.5	3,126,496,000	0.00	71.3	
19	2042	-	73.5	3,126,496,000	0.00	71.3	
20	2043	-	72.5	3,126,496,000	0.00	71.3	
21	2044	-	71.5	3,126,496,000	0.00	71.3	
22	2045	-	70.5	3,126,496,000	0.00	71.3	
23	2046	-	69.5	3,126,496,000	0.00	71.3	
24	2047	-	68.5	3,126,496,000	0.00	71.3	
25	2048	-	67.5	3,126,496,000	0.00	71.3	
26	2049	-	66.5	3,126,496,000	0.00	71.3	
27	2050	-	65.5	3,126,496,000	0.00	71.3	
28	2051	-	64.5	3,126,496,000	0.00	71.3	
29	2052	-	63.5	3,126,496,000	0.00	71.3	
30	2053	134,130,000	62.5	2,992,366,000	2.68	71.3	
31	2054	267,385,000	61.5	2,724,981,000	5.50	68.7	
32	2055	333,387,000	60.5	2,391,594,000	7.40	63.2	
33	2056	250,760,000	59.5	2,140,834,000	6.24	55.8	
34	2057	226,142,000	58.5	1,914,692,000	6.18	49.5	
35	2058	223,930,000	57.5	1,690,762,000	6.72	43.3	
36	2059	130,804,000	56.5	1,559,958,000	4.37	36.6	
37	2060	83,715,000	55.5	1,476,243,000	2.98	32.3	
38	2061	79,635,000	54.5	1,396,608,000	2.94	29.3	
39	2062	21,166,000	53.5	1,375,442,000	0.81	26.3	
40	2063	10,036,000	52.5	1,365,406,000	0.38	25.5	
41	2064	10,327,000	51.5	1,355,079,000	0.39	25.1	
42	2065	10,573,000	50.5	1,344,506,000	0.39	24.8	
43	2066	10,853,000	49.5	1,333,653,000	0.40	24.4	
44	2067	11,140,000	48.5	1,322,513,000	0.41	24.0	
45	2068	11,465,000	47.5	1,311,048,000	0.41	23.6	

Trigger Point:
Equity limited to 30% at license expiration. (2053 for Unit #2)

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

II. WEIGHTED AVERAGE LIFE - CP2

Line (A)	Year (B)	Spending (C)	Remaining Life (D)	Dollars to go (E)	Time Weighting (F)	Weighted Avg Life (G)	Trigger Points (H)
46	2069	11,739,000	46.5	1,299,309,000	0.42	23.1	
47	2070	12,051,000	45.5	1,287,258,000	0.42	22.7	
48	2071	12,371,000	44.5	1,274,887,000	0.43	22.3	
49	2072	12,732,000	43.5	1,262,155,000	0.43	21.9	
50	2073	13,039,000	42.5	1,249,116,000	0.44	21.4	
51	2074	13,385,000	41.5	1,235,731,000	0.44	21.0	
52	2075	13,743,000	40.5	1,221,988,000	0.45	20.6	
53	2076	14,145,000	39.5	1,207,843,000	0.46	20.1	
54	2077	14,485,000	38.5	1,193,358,000	0.46	19.6	
55	2078	14,871,000	37.5	1,178,487,000	0.47	19.2	
56	2079	15,268,000	36.5	1,163,219,000	0.47	18.7	
57	2080	15,715,000	35.5	1,147,504,000	0.48	18.2	
58	2081	16,092,000	34.5	1,131,412,000	0.48	17.8	
59	2082	16,521,000	33.5	1,114,891,000	0.49	17.3	
60	2083	16,961,000	32.5	1,097,930,000	0.49	16.8	
61	2084	17,457,000	31.5	1,080,473,000	0.50	16.3	
62	2085	17,877,000	30.5	1,062,596,000	0.50	15.8	
63	2086	18,353,000	29.5	1,044,243,000	0.51	15.3	
64	2087	18,843,000	28.5	1,025,400,000	0.51	14.8	
65	2088	19,395,000	27.5	1,006,005,000	0.52	14.3	
66	2089	19,862,000	26.5	986,143,000	0.52	13.8	
67	2090	20,392,000	25.5	965,751,000	0.53	13.2	
68	2091	20,936,000	24.5	944,815,000	0.53	12.7	
69	2092	21,551,000	23.5	923,264,000	0.54	12.2	
70	2093	22,070,000	22.5	901,194,000	0.54	11.6	
71	2094	22,661,000	21.5	878,533,000	0.54	11.1	
72	2095	23,266,000	20.5	855,267,000	0.54	10.6	
73	2096	23,949,000	19.5	831,318,000	0.55	10.0	
74	2097	24,527,000	18.5	806,791,000	0.55	9.5	
75	2098	25,183,000	17.5	781,608,000	0.55	8.9	
76	2099	25,856,000	16.5	755,752,000	0.55	8.4	
77	2100	26,548,000	15.5	729,204,000	0.54	7.8	
78	2101	27,260,000	14.5	701,944,000	0.54	7.3	
79	2102	27,989,000	13.5	673,955,000	0.54	6.7	
80	2103	28,740,000	12.5	645,215,000	0.53	6.2	
81	2104	29,585,000	11.5	615,630,000	0.53	5.7	
82	2105	30,300,000	10.5	585,330,000	0.52	5.1	
83	2106	31,111,000	9.5	554,219,000	0.50	4.6	
84	2107	31,945,000	8.5	522,274,000	0.49	4.1	
85	2108	32,887,000	7.5	489,387,000	0.47	3.6	
86	2109	33,682,000	6.5	455,705,000	0.45	3.2	
87	2110	34,586,000	5.5	421,119,000	0.42	2.7	
88	2111	35,514,000	4.5	385,605,000	0.38	2.3	
89	2112	36,561,000	3.5	349,044,000	0.33	1.9	
90	2113	37,446,000	2.5	311,598,000	0.27	1.6	
91	2114	170,783,000	1.5	140,815,000	0.82	1.3	
92	2115	140,815,000	0.5	-	0.50	0.5	
93							
94	Total	**$ 3,126,496,000**					

Trigger Point: Equity limited to 0% when the Weighted Average Life reaches two and a half years, which occurs in 2111 for Unit #2.

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

II. WEIGHTED AVERAGE LIFE - CP2

Line (A)	Year (B)	Spending (C)	Remaining Life (D)	Dollars to go (E)	Time Weighting (F)	Weighted Avg Life (G)	Trigger Points (H)

NOTES: (Section 2, Part I and II)

(E) Sum of column (C) spending in all subsequent years.

(D) Assume remaining life for next years expenditure is one half year.

(F) The time weighted life at the end of the year in column (B).

Formula: Column (F) = column (C) / (previous year column (E)) X column (D)

(G) The weighted average life at the end of the year in column (B).

Formula: Column (G) = sum of remaining values in column (F)

(H) Trigger Points are based on weighted average life defined in Substantive Rule §25.303 (e)(3)(B)(vi).

CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

III. ASSET ALLOCATION AND EXPECTED RETURNS - CP1 AND CP2

		Spending			Asset Allocation			Returns		
Line (A)	Year (B)	from Trust (C)	% of Balance (D)	End of Year NDT Balance (E)	Equity (F)	Bonds (G)	Cash (H)	Composite (I)	After Fees (J)	After Tax (K)
1	2024	-		2,012,754,964						
2	2025	-	0.0%	2,124,529,974	60%	40%	0%	6.027%	5.855%	4.684%
3	2026	-	0.0%	2,224,050,776	60%	40%	0%	6.027%	5.855%	4.684%
4	2027	-	0.0%	2,328,233,499	60%	40%	0%	6.027%	5.855%	4.684%
5	2028	-	0.0%	2,437,296,524	60%	40%	0%	6.027%	5.855%	4.684%
6	2029	-	0.0%	2,551,468,462	60%	40%	0%	6.027%	5.855%	4.684%
7	2030	-	0.0%	2,670,988,634	60%	40%	0%	6.027%	5.855%	4.684%
8	2031	-	0.0%	2,796,107,571	60%	40%	0%	6.027%	5.855%	4.684%
9	2032	-	0.0%	2,927,087,539	60%	40%	0%	6.027%	5.855%	4.684%
10	2033	-	0.0%	3,064,203,091	60%	40%	0%	6.027%	5.855%	4.684%
11	2034	-	0.0%	3,207,741,640	60%	40%	0%	6.027%	5.855%	4.684%
12	2035	-	0.0%	3,358,004,063	60%	40%	0%	6.027%	5.855%	4.684%
13	2036	-	0.0%	3,515,305,331	60%	40%	0%	6.027%	5.855%	4.684%
14	2037	-	0.0%	3,679,975,169	60%	40%	0%	6.027%	5.855%	4.684%
15	2038	-	0.0%	3,852,358,748	60%	40%	0%	6.027%	5.855%	4.684%
16	2039	-	0.0%	4,032,817,409	60%	40%	0%	6.027%	5.855%	4.684%
17	2040	-	0.0%	4,221,729,417	60%	40%	0%	6.027%	5.855%	4.684%
18	2041	-	0.0%	4,419,490,759	60%	40%	0%	6.027%	5.855%	4.684%
19	2042	-	0.0%	4,626,515,970	60%	40%	0%	6.027%	5.855%	4.684%
20	2043	-	0.0%	4,843,239,003	60%	40%	0%	6.027%	5.855%	4.684%
21	2044	-	0.0%	5,070,114,141	60%	40%	0%	6.027%	5.855%	4.684%
22	2045	-	0.0%	5,307,616,946	60%	40%	0%	6.027%	5.855%	4.684%
23	2046	-	0.0%	5,556,245,256	60%	40%	0%	6.027%	5.855%	4.684%
24	2047	-	0.0%	5,816,520,230	60%	40%	0%	6.027%	5.855%	4.684%
25	2048	-	0.0%	6,079,469,289	50%	50%	0%	5.823%	5.651%	4.521%
26	2049	-	0.0%	6,344,357,116	40%	60%	0%	5.618%	5.446%	4.357%
27	2050	145,780,000	2.3%	6,460,299,703	30%	68%	2%	5.388%	5.217%	4.173%
28	2051	320,356,000	5.0%	6,401,386,796	30%	65%	5%	5.359%	5.187%	4.150%
29	2052	330,939,000	5.2%	6,329,110,761	30%	65%	5%	5.357%	5.185%	4.148%
30	2053	345,090,000	5.5%	6,239,239,142	30%	65%	5%	5.354%	5.182%	4.145%
31	2054	430,995,000	6.9%	6,057,184,858	30%	63%	7%	5.338%	5.166%	4.133%
32	2055	461,846,000	7.6%	5,835,750,819	30%	62%	8%	5.330%	5.158%	4.126%
33	2056	285,979,000	4.9%	5,786,039,852	30%	65%	5%	5.360%	5.188%	4.150%
34	2057	262,186,000	4.5%	5,758,736,146	30%	65%	5%	5.364%	5.192%	4.154%
35	2058	272,609,000	4.7%	5,719,558,715	30%	65%	5%	5.362%	5.190%	4.152%
36	2059	183,823,000	3.2%	5,770,136,527	30%	67%	3%	5.378%	5.206%	4.165%
37	2060	139,662,000	2.4%	5,868,299,724	30%	68%	2%	5.387%	5.215%	4.172%
38	2061	131,976,000	2.2%	5,978,492,320	30%	68%	2%	5.389%	5.217%	4.174%
39	2062	37,915,000	0.6%	6,190,154,719	30%	69%	1%	5.407%	5.235%	4.188%
40	2063	20,085,000	0.3%	6,429,053,050	30%	70%	0%	5.410%	5.238%	4.191%
41	2064	20,667,000	0.3%	6,677,370,140	30%	70%	0%	5.410%	5.238%	4.191%
42	2065	21,161,000	0.3%	6,935,591,575	30%	70%	0%	5.410%	5.238%	4.191%
43	2066	21,721,000	0.3%	7,204,064,726	30%	70%	0%	5.410%	5.238%	4.191%
44	2067	22,296,000	0.3%	7,483,204,047	30%	70%	0%	5.410%	5.238%	4.191%
45	2068	22,945,000	0.3%	7,773,380,618	30%	70%	0%	5.410%	5.238%	4.191%

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

III. ASSET ALLOCATION AND EXPECTED RETURNS - CP1 AND CP2

		Spending			Asset Allocation			Returns		
Line	Year	from Trust	% of Balance	End of Year NDT Balance	Equity	Bonds	Cash	Composite	After Fees	After Tax
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
46	2069	23,494,000	0.3%	8,075,160,253	30%	70%	0%	5.410%	5.238%	4.191%
47	2070	24,118,000	0.3%	8,388,952,290	30%	70%	0%	5.410%	5.239%	4.191%
48	2071	24,759,000	0.3%	8,715,242,956	30%	70%	0%	5.410%	5.239%	4.191%
49	2072	25,483,000	0.3%	9,054,470,907	30%	70%	0%	5.410%	5.239%	4.191%
50	2073	26,096,000	0.3%	9,407,292,961	30%	70%	0%	5.410%	5.239%	4.191%
51	2074	26,788,000	0.3%	9,774,197,830	30%	70%	0%	5.411%	5.239%	4.191%
52	2075	27,504,000	0.3%	10,155,751,356	30%	70%	0%	5.411%	5.239%	4.191%
53	2076	28,310,000	0.3%	10,552,475,145	30%	70%	0%	5.411%	5.239%	4.191%
54	2077	28,990,000	0.3%	10,965,135,101	30%	70%	0%	5.411%	5.239%	4.191%
55	2078	29,763,000	0.3%	11,394,303,733	30%	70%	0%	5.411%	5.239%	4.191%
56	2079	30,558,000	0.3%	11,840,650,668	30%	70%	0%	5.411%	5.239%	4.191%
57	2080	31,451,000	0.3%	12,304,795,355	30%	70%	0%	5.411%	5.239%	4.191%
58	2081	32,207,000	0.3%	12,787,625,207	30%	70%	0%	5.411%	5.239%	4.191%
59	2082	33,064,000	0.3%	13,289,819,772	30%	70%	0%	5.411%	5.239%	4.191%
60	2083	33,945,000	0.3%	13,812,166,386	30%	70%	0%	5.411%	5.239%	4.191%
61	2084	34,939,000	0.3%	14,355,393,753	30%	70%	0%	5.411%	5.239%	4.191%
62	2085	35,779,000	0.2%	14,920,536,075	30%	70%	0%	5.411%	5.239%	4.191%
63	2086	36,731,000	0.2%	15,508,397,014	30%	70%	0%	5.411%	5.239%	4.191%
64	2087	37,712,000	0.2%	16,119,899,400	30%	70%	0%	5.411%	5.239%	4.191%
65	2088	38,817,000	0.2%	16,755,906,935	30%	70%	0%	5.411%	5.239%	4.191%
66	2089	39,752,000	0.2%	17,417,622,287	30%	70%	0%	5.411%	5.239%	4.191%
67	2090	40,813,000	0.2%	18,105,993,751	30%	70%	0%	5.411%	5.239%	4.191%
68	2091	41,901,000	0.2%	18,822,111,334	30%	70%	0%	5.411%	5.239%	4.191%
69	2092	43,132,000	0.2%	19,566,991,299	30%	70%	0%	5.411%	5.239%	4.191%
70	2093	44,172,000	0.2%	20,342,036,465	30%	70%	0%	5.411%	5.239%	4.191%
71	2094	45,353,000	0.2%	21,148,366,597	30%	70%	0%	5.411%	5.239%	4.191%
72	2095	46,564,000	0.2%	21,987,262,723	30%	70%	0%	5.411%	5.239%	4.192%
73	2096	47,931,000	0.2%	22,859,929,838	30%	70%	0%	5.411%	5.239%	4.192%
74	2097	49,088,000	0.2%	23,768,000,358	30%	70%	0%	5.411%	5.239%	4.192%
75	2098	50,401,000	0.2%	24,712,798,265	30%	70%	0%	5.411%	5.239%	4.192%
76	2099	51,749,000	0.2%	25,695,827,662	30%	70%	0%	5.411%	5.240%	4.192%
77	2100	53,134,000	0.2%	26,718,653,664	30%	70%	0%	5.411%	5.240%	4.192%
78	2101	54,556,000	0.2%	27,782,904,960	30%	70%	0%	5.411%	5.240%	4.192%
79	2102	56,017,000	0.2%	28,890,282,658	30%	70%	0%	5.411%	5.240%	4.192%
80	2103	57,519,000	0.2%	30,042,550,961	30%	70%	0%	5.411%	5.240%	4.192%
81	2104	59,211,000	0.2%	31,241,396,678	30%	70%	0%	5.411%	5.240%	4.192%
82	2105	60,642,000	0.2%	32,489,041,776	30%	70%	0%	5.412%	5.240%	4.192%
83	2106	62,266,000	0.2%	33,787,333,886	30%	70%	0%	5.412%	5.240%	4.192%
84	2107	63,935,000	0.2%	35,138,350,527	30%	70%	0%	5.412%	5.240%	4.192%
85	2108	65,819,000	0.2%	36,544,081,277	30%	70%	0%	5.412%	5.240%	4.192%
86	2109	67,411,000	0.2%	37,947,375,651	20%	80%	0%	5.207%	5.035%	4.028%
87	2110	69,219,000	0.2%	39,343,319,313	10%	90%	0%	5.003%	4.831%	3.865%
88	2111	71,076,000	0.2%	40,727,000,018	0%	100%	0%	4.798%	4.626%	3.701%
89	2112	73,172,000	0.2%	42,159,758,655	0%	100%	0%	4.798%	4.626%	3.701%
90	2113	74,943,000	0.2%	43,643,746,219	0%	100%	0%	4.798%	4.626%	3.701%
91	2114	341,824,000	0.8%	44,908,519,807	0%	99%	1%	4.791%	4.620%	3.696%
92	2115	281,913,000	0.6%	45,890,183,816	0%	0%	100%	3.700%	3.528%	2.823%
93										
94	Total	**$ 6,102,054,000**								

COMANCHE PEAK POWER COMPANY LLC
DETERMINATION OF EXPECTED ASSET ALLOCATION
2025 Funding Analysis

III. ASSET ALLOCATION AND EXPECTED RETURNS - CP1 AND CP2

		Spending			Asset Allocation			Returns		
Line	Year	from Trust	% of Balance	End of Year NDT Balance	Equity	Bonds	Cash	Composite	After Fees	After Tax
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)

NOTES: (Section 2, Part III)

(D) Column (C) divided by the Previous year's Column (E)
Spending for year divided by the Previous year's Ending of Year NDT Balance

(F)-(H) Asset Allocation each year

(I) Return composite based on the year's asset allocation [Returns from Section 1, Part III, Lines 2-4]
(Equity return x Equity allocation) + (Bond return x Bond allocation) + (Cash return x Cash allocation)

(J) Column (I) - Fees & Expenses [Fees & Expenses from Section 1, Part II, Line 36]

(K) Column (J) X (1 - Income Tax Rate) [Income Tax rate from Section 1, Part III, Line 5]

CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
ESTIMATED ANNUAL DECOMMISSIONING EXPENDITURES
2025 Funding Analysis

I. CURRENT DOLLAR DECOMMISSIONING COST (Including 10% Contingency)

Line	Period	2024 Dollar Decommissioning Cost (1)		
		CP 1	CP 2	Total Cost
		(A)	(B)	(C) = (A) + (B)
1	2050	$ 71,574,503	$ -	$ 71,574,503
2	2051	166,882,697	-	166,882,697
3	2052	174,036,787	-	174,036,787
4	2053	106,837,285	60,900,970	167,738,256
5	2054	79,868,139	127,189,219	207,057,358
6	2055	62,196,076	164,100,195	226,296,271
7	2056	14,958,018	117,498,603	132,456,621
8	2057	14,917,150	102,374,286	117,291,435
9	2058	20,726,867	100,494,642	121,221,509
10	2059	20,786,978	52,689,843	73,476,821
11	2060	23,459,944	36,403,943	59,863,887
12	2061	22,027,492	35,044,742	57,072,235
13	2062	6,499,058	8,563,404	15,062,461
14	2063	3,565,347	3,560,415	7,125,762
15	2064	3,573,925	3,568,981	7,142,905
16	2065	3,565,347	3,560,415	7,125,762
17	2066	3,565,347	3,560,415	7,125,762
18	2067	3,565,347	3,560,415	7,125,762
19	2068	3,573,925	3,568,981	7,142,905
20	2069	3,565,347	3,560,415	7,125,762
21	2070	3,565,347	3,560,415	7,125,762
22	2071	3,565,347	3,560,415	7,125,762
23	2072	3,573,925	3,568,981	7,142,905
24	2073	3,565,347	3,560,415	7,125,762
25	2074	3,565,347	3,560,415	7,125,762
26	2075	3,565,347	3,560,415	7,125,762
27	2076	3,573,925	3,568,981	7,142,905
28	2077	3,565,347	3,560,415	7,125,762
29	2078	3,565,347	3,560,415	7,125,762
30	2079	3,565,347	3,560,415	7,125,762
31	2080	3,573,925	3,568,981	7,142,905
32	2081	3,565,347	3,560,415	7,125,762
33	2082	3,565,347	3,560,415	7,125,762
34	2083	3,565,347	3,560,415	7,125,762
35	2084	3,573,925	3,568,981	7,142,905
36	2085	3,565,347	3,560,415	7,125,762
37	2086	3,565,347	3,560,415	7,125,762
38	2087	3,565,347	3,560,415	7,125,762
39	2088	3,573,925	3,568,981	7,142,905
40	2089	3,565,347	3,560,415	7,125,762

COMANCHE PEAK POWER COMPANY LLC
ESTIMATED ANNUAL DECOMMISSIONING EXPENDITURES
2025 Funding Analysis

I. CURRENT DOLLAR DECOMMISSIONING COST (Including 10% Contingency)

Line	Period	2024 Dollar Decommissioning Cost (1)		
		CP 1	CP 2	Total Cost
		(A)	(B)	(C) = (A) + (B)
41	2090	3,565,347	3,560,415	7,125,762
42	2091	3,565,347	3,560,415	7,125,762
43	2092	3,573,925	3,568,981	7,142,905
44	2093	3,565,347	3,560,415	7,125,762
45	2094	3,565,347	3,560,415	7,125,762
46	2095	3,565,347	3,560,415	7,125,762
47	2096	3,573,925	3,568,981	7,142,905
48	2097	3,565,347	3,560,415	7,125,762
49	2098	3,565,347	3,560,415	7,125,762
50	2099	3,565,347	3,560,415	7,125,762
51	2100	3,565,347	3,560,415	7,125,762
52	2101	3,565,347	3,560,415	7,125,762
53	2102	3,565,347	3,560,415	7,125,762
54	2103	3,565,347	3,560,415	7,125,762
55	2104	3,573,925	3,568,981	7,142,905
56	2105	3,565,347	3,560,415	7,125,762
57	2106	3,565,347	3,560,415	7,125,762
58	2107	3,565,347	3,560,415	7,125,762
59	2108	3,573,925	3,568,981	7,142,905
60	2109	3,565,347	3,560,415	7,125,762
61	2110	3,565,347	3,560,415	7,125,762
62	2111	3,565,347	3,560,415	7,125,762
63	2112	3,573,925	3,568,981	7,142,905
64	2113	3,565,347	3,560,415	7,125,762
65	2114	15,929,383	15,904,653	31,834,037
66	2115	15,462,128	15,431,204	30,893,332
67				-
68	Totals	$ 998,098,136	$ 1,018,279,642	**$ 2,016,377,779**

NOTES: (Section 3, Part I)

(1) Decommissioning costs adjusted for the 10% ceiling value required by Public Utility Commission of Texas' Substantive Rule 25.231(b)(1)(F)(i)

CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
ESTIMATED ANNUAL DECOMMISSIONING EXPENDITURES
2025 Funding Analysis

II. FUTURE DOLLAR DECOMMISSIONING COST (Including 10% Contingency)

Line	Period	Future Dollar Decommissioning Cost (1)		
		CP 1	CP 2	Total Cost
		(A)	(B)	(C) = (A) + (B)
1	2050	$ 145,780,000	$ -	$ 145,780,000
2	2051	320,356,000	-	320,356,000
3	2052	330,939,000	-	330,939,000
4	2053	210,960,000	134,130,000	345,090,000
5	2054	163,610,000	267,385,000	430,995,000
6	2055	128,459,000	333,387,000	461,846,000
7	2056	35,219,000	250,760,000	285,979,000
8	2057	36,044,000	226,142,000	262,186,000
9	2058	48,679,000	223,930,000	272,609,000
10	2059	53,019,000	130,804,000	183,823,000
11	2060	55,947,000	83,715,000	139,662,000
12	2061	52,341,000	79,635,000	131,976,000
13	2062	16,749,000	21,166,000	37,915,000
14	2063	10,049,000	10,036,000	20,085,000
15	2064	10,340,000	10,327,000	20,667,000
16	2065	10,588,000	10,573,000	21,161,000
17	2066	10,868,000	10,853,000	21,721,000
18	2067	11,156,000	11,140,000	22,296,000
19	2068	11,480,000	11,465,000	22,945,000
20	2069	11,755,000	11,739,000	23,494,000
21	2070	12,067,000	12,051,000	24,118,000
22	2071	12,388,000	12,371,000	24,759,000
23	2072	12,751,000	12,732,000	25,483,000
24	2073	13,057,000	13,039,000	26,096,000
25	2074	13,403,000	13,385,000	26,788,000
26	2075	13,761,000	13,743,000	27,504,000
27	2076	14,165,000	14,145,000	28,310,000
28	2077	14,505,000	14,485,000	28,990,000
29	2078	14,892,000	14,871,000	29,763,000
30	2079	15,290,000	15,268,000	30,558,000
31	2080	15,736,000	15,715,000	31,451,000
32	2081	16,115,000	16,092,000	32,207,000
33	2082	16,543,000	16,521,000	33,064,000
34	2083	16,984,000	16,961,000	33,945,000
35	2084	17,482,000	17,457,000	34,939,000
36	2085	17,902,000	17,877,000	35,779,000
37	2086	18,378,000	18,353,000	36,731,000
38	2087	18,869,000	18,843,000	37,712,000
39	2088	19,422,000	19,395,000	38,817,000
40	2089	19,890,000	19,862,000	39,752,000

COMANCHE PEAK POWER COMPANY LLC
ESTIMATED ANNUAL DECOMMISSIONING EXPENDITURES
2025 Funding Analysis

II. FUTURE DOLLAR DECOMMISSIONING COST (Including 10% Contingency)

Line	Period	Future Dollar Decommissioning Cost (1)		
		CP 1	CP 2	Total Cost
		(A)	(B)	(C) = (A) + (B)
41	2090	20,421,000	20,392,000	40,813,000
42	2091	20,965,000	20,936,000	41,901,000
43	2092	21,581,000	21,551,000	43,132,000
44	2093	22,102,000	22,070,000	44,172,000
45	2094	22,692,000	22,661,000	45,353,000
46	2095	23,298,000	23,266,000	46,564,000
47	2096	23,982,000	23,949,000	47,931,000
48	2097	24,561,000	24,527,000	49,088,000
49	2098	25,218,000	25,183,000	50,401,000
50	2099	25,893,000	25,856,000	51,749,000
51	2100	26,586,000	26,548,000	53,134,000
52	2101	27,298,000	27,260,000	54,558,000
53	2102	28,028,000	27,989,000	56,017,000
54	2103	28,779,000	28,740,000	57,519,000
55	2104	29,626,000	29,585,000	59,211,000
56	2105	30,342,000	30,300,000	60,642,000
57	2106	31,155,000	31,111,000	62,266,000
58	2107	31,990,000	31,945,000	63,935,000
59	2108	32,932,000	32,887,000	65,819,000
60	2109	33,729,000	33,682,000	67,411,000
61	2110	34,633,000	34,586,000	69,219,000
62	2111	35,562,000	35,514,000	71,076,000
63	2112	36,611,000	36,561,000	73,172,000
64	2113	37,497,000	37,446,000	74,943,000
65	2114	171,041,000	170,783,000	341,824,000
66	2115	141,098,000	140,815,000	281,913,000
67				-
68		$ 2,975,558,000	$ 3,126,496,000	**$ 6,102,054,000**

NOTES: (Section 3, Part II)

(1) Decommissioning costs adjusted for the 10% ceiling value required by Public Utility Commission of Texas' Substantive Rule 25.231(b)(1)(F)(i)

CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
ANNUAL PROJECTED FUNDING REQUIREMENT
2025 Funding Analysis

I. PROJECTED ANNUAL SUMMARY - CP1

Line	Year (A)	Contributions (B)	Net Fund Earnings (C)	Decommissioning Outlays (D)	Fund Accumulation (E)	Weighted Avg Life (F)	Net Return (G)
1	2024		Balance at 12/31/24 ======>		984,842,075		
2	2025	12,078,246	46,416,522	-	1,043,336,843	70.8	4.684%
3	2026	-	48,873,737	-	1,092,210,580	70.8	4.684%
4	2027	-	51,163,163	-	1,143,373,743	70.8	4.684%
5	2028	-	53,559,834	-	1,196,933,577	70.8	4.684%
6	2029	-	56,068,773	-	1,253,002,350	70.8	4.684%
7	2030	-	58,695,241	-	1,311,697,591	70.8	4.684%
8	2031	-	61,444,742	-	1,373,142,334	70.8	4.684%
9	2032	-	64,323,040	-	1,437,465,374	70.8	4.684%
10	2033	-	67,336,168	-	1,504,801,542	70.8	4.684%
11	2034	-	70,490,442	-	1,575,291,984	70.8	4.684%
12	2035	-	73,792,474	-	1,649,084,457	70.8	4.684%
13	2036	-	77,249,185	-	1,726,333,642	70.8	4.684%
14	2037	-	80,867,821	-	1,807,201,462	70.8	4.684%
15	2038	-	84,655,967	-	1,891,857,429	70.8	4.684%
16	2039	-	88,621,564	-	1,980,478,994	70.8	4.684%
17	2040	-	92,772,924	-	2,073,251,918	70.8	4.684%
18	2041	-	97,118,749	-	2,170,370,667	70.8	4.684%
19	2042	-	101,668,149	-	2,272,038,816	70.8	4.684%
20	2043	-	106,430,659	-	2,378,469,475	70.8	4.684%
21	2044	-	111,416,263	-	2,489,885,738	70.8	4.684%
22	2045	-	116,635,411	-	2,606,521,149	70.8	4.684%
23	2046	-	122,099,043	-	2,728,620,192	70.8	4.684%
24	2047	-	127,818,611	-	2,856,438,803	70.8	4.684%
25	2048	-	129,131,829	-	2,985,570,632	70.8	4.521%
26	2049	-	130,083,940	-	3,115,654,571	70.8	4.357%
27	2050	-	126,981,486	145,780,000	3,096,856,058	70.8	4.173%
28	2051		121,866,566	320,356,000	2,898,366,623	67.6	4.150%
29	2052		113,359,309	330,939,000	2,680,786,932	60.3	4.148%
30	2053		106,758,490	210,960,000	2,576,585,422	51.9	4.145%
31	2054		103,100,774	163,610,000	2,516,076,196	45.8	4.133%
32	2055		101,171,778	128,459,000	2,488,788,974	40.7	4.126%
33	2056		102,561,952	35,219,000	2,556,131,926	36.4	4.150%
34	2057		105,422,225	36,044,000	2,625,510,151	35.2	4.154%
35	2058		107,995,150	48,679,000	2,684,826,301	33.9	4.152%
36	2059		110,723,290	53,019,000	2,742,530,592	32.1	4.165%
37	2060		113,255,346	55,947,000	2,799,838,937	30.2	4.172%
38	2061		115,763,410	52,341,000	2,863,261,347	28.1	4.174%
39	2062		119,558,868	16,749,000	2,966,071,215	26.2	4.188%
40	2063		124,085,407	10,049,000	3,080,107,622	25.5	4.191%
41	2064		128,858,924	10,340,000	3,198,626,547	25.1	4.191%
42	2065		133,821,685	10,588,000	3,321,860,232	24.7	4.191%
43	2066		138,981,209	10,868,000	3,449,973,440	24.4	4.191%
44	2067		144,345,123	11,156,000	3,583,162,563	24.0	4.191%
45	2068		149,920,827	11,480,000	3,721,603,390	23.5	4.191%
46	2069		155,718,207	11,755,000	3,865,566,596	23.1	4.191%
47	2070		161,746,074	12,067,000	4,015,245,670	22.7	4.191%

COMANCHE PEAK POWER COMPANY LLC
ANNUAL PROJECTED FUNDING REQUIREMENT
2025 Funding Analysis

I. PROJECTED ANNUAL SUMMARY - CP1

Line	Year (A)	Contributions (B)	Net Fund Earnings (C)	Decommissioning Outlays (D)	Fund Accumulation (E)	Weighted Avg Life (F)	Net Return (G)
48	2071		168,013,373	12,388,000	4,170,871,044	22.3	4.191%
49	2072		174,528,799	12,751,000	4,332,648,843	21.9	4.191%
50	2073		181,303,885	13,057,000	4,500,895,728	21.4	4.191%
51	2074		188,349,079	13,403,000	4,675,841,807	21.0	4.191%
52	2075		195,674,849	13,761,000	4,857,755,656	20.6	4.191%
53	2076		203,291,466	14,165,000	5,046,882,122	20.1	4.191%
54	2077		211,212,412	14,505,000	5,243,589,534	19.6	4.191%
55	2078		219,449,885	14,892,000	5,448,147,419	19.2	4.191%
56	2079		228,016,242	15,290,000	5,660,873,661	18.7	4.191%
57	2080		236,923,717	15,736,000	5,882,061,377	18.2	4.191%
58	2081		246,188,000	16,115,000	6,112,134,377	17.8	4.191%
59	2082		255,823,432	16,543,000	6,351,414,809	17.3	4.191%
60	2083		265,844,599	16,984,000	6,600,275,408	16.8	4.191%
61	2084		276,265,838	17,482,000	6,859,059,246	16.3	4.191%
62	2085		287,105,485	17,902,000	7,128,262,731	15.8	4.191%
63	2086		298,380,430	18,378,000	7,408,265,161	15.3	4.191%
64	2087		310,107,788	18,869,000	7,699,503,949	14.8	4.191%
65	2088		322,304,518	19,422,000	8,002,386,467	14.3	4.191%
66	2089		334,992,016	19,890,000	8,317,488,483	13.7	4.191%
67	2090		348,190,085	20,421,000	8,645,257,568	13.2	4.191%
68	2091		361,918,955	20,965,000	8,986,211,523	12.7	4.191%
69	2092		376,198,617	21,581,000	9,340,829,141	12.2	4.191%
70	2093		391,054,052	22,102,000	9,709,781,192	11.6	4.191%
71	2094		406,508,555	22,692,000	10,093,597,748	11.1	4.191%
72	2095		422,585,934	23,298,000	10,492,885,682	10.6	4.192%
73	2096		439,309,808	23,982,000	10,908,213,490	10.0	4.192%
74	2097		456,709,388	24,561,000	11,340,361,878	9.5	4.192%
75	2098		474,812,042	25,218,000	11,789,955,920	8.9	4.192%
76	2099		493,645,747	25,893,000	12,257,708,667	8.4	4.192%
77	2100		513,240,396	26,586,000	12,744,363,063	7.8	4.192%
78	2101		533,627,115	27,298,000	13,250,692,178	7.3	4.192%
79	2102		554,838,359	28,028,000	13,777,502,537	6.7	4.192%
80	2103		576,907,854	28,779,000	14,325,631,391	6.2	4.192%
81	2104		599,868,521	29,626,000	14,895,873,912	5.7	4.192%
82	2105		623,760,354	30,342,000	15,489,292,266	5.1	4.192%
83	2106		648,621,212	31,155,000	16,106,758,478	4.6	4.192%
84	2107		674,489,855	31,990,000	16,749,258,333	4.1	4.192%
85	2108		701,405,128	32,932,000	17,417,731,462	3.6	4.192%
86	2109		700,939,062	33,729,000	18,084,941,524	3.2	4.028%
87	2110		698,234,717	34,633,000	18,748,543,241	2.7	3.865%
88	2111		693,213,940	35,562,000	19,406,195,182	2.3	3.701%
89	2112		717,535,512	36,611,000	20,087,119,694	1.9	3.701%
90	2113		742,723,136	37,497,000	20,792,345,830	1.6	3.701%
91	2114		765,248,832	171,041,000	21,386,553,663	1.3	3.696%
92	2115		601,650,200	141,098,000	21,847,105,863	0.5	2.823%
93							
94	Totals	12,078,246	23,825,743,541	2,975,558,000			

COMANCHE PEAK POWER COMPANY LLC
ANNUAL PROJECTED FUNDING REQUIREMENT
2025 Funding Analysis

I. PROJECTED ANNUAL SUMMARY - CP1

Line	Year (A)	Contributions (B)	Net Fund Earnings (C)	Decommissioning Outlays (D)	Fund Accumulation (E)	Weighted Avg Life (F)	Net Return (G)

NOTES: (Section 4, Part I)

Line 1 Net After-tax Market Value of the Trust at December 31, 2024. (See Section 1, Part I, line 7)

Line 2 Current contributions for 9 months with new rates implemented on 9/1/25. (Contributions lag by one month)

Columns

(B) Assumes new rates are implemented and continue until the end of each unit's license.

(C) Fund earnings are net of projected expenses and taxes. (C) = [previous (E) + [(B) - (D)] / 2] * Return

(D) Decommissioning Cost from Section 3, Part II.

(E) Column (E) = Previous year (E) + Current year (B) + Current year (C) - Current year (D).

(F) Weighted Average Life (See Column (G) on Section 2, Part I & II)

CP1 = Comanche Peak Nuclear Power Plant Unit #1

CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
ANNUAL PROJECTED FUNDING REQUIREMENT
2025 Funding Analysis

II. PROJECTED ANNUAL SUMMARY - CP2

Line	Year (A)	Contributions (B)	Net Fund Earnings (C)	Decommissioning Outlays (D)	Fund Accumulation (E)	Weighted Avg Life (F)	Net Return (G)
1	2024		Balance at 12/31/24 =======>		1,027,912,888		
2	2025	5,011,638	48,268,604	-	1,081,193,131	71.3	4.684%
3	2026	-	50,647,065	-	1,131,840,196	71.3	4.684%
4	2027	-	53,019,560	-	1,184,859,756	71.3	4.684%
5	2028	-	55,503,191	-	1,240,362,947	71.3	4.684%
6	2029	-	58,103,165	-	1,298,466,112	71.3	4.684%
7	2030	-	60,824,931	-	1,359,291,043	71.3	4.684%
8	2031	-	63,674,195	-	1,422,965,237	71.3	4.684%
9	2032	-	66,656,928	-	1,489,622,166	71.3	4.684%
10	2033	-	69,779,384	-	1,559,401,550	71.3	4.684%
11	2034	-	73,048,107	-	1,632,449,657	71.3	4.684%
12	2035	-	76,469,949	-	1,708,919,606	71.3	4.684%
13	2036	-	80,052,083	-	1,788,971,689	71.3	4.684%
14	2037	-	83,802,017	-	1,872,773,707	71.3	4.684%
15	2038	-	87,727,612	-	1,960,501,319	71.3	4.684%
16	2039	-	91,837,096	-	2,052,338,415	71.3	4.684%
17	2040	-	96,139,084	-	2,148,477,499	71.3	4.684%
18	2041	-	100,642,592	-	2,249,120,092	71.3	4.684%
19	2042	-	105,357,062	-	2,354,477,154	71.3	4.684%
20	2043	-	110,292,374	-	2,464,769,528	71.3	4.684%
21	2044	-	115,458,875	-	2,580,228,403	71.3	4.684%
22	2045	-	120,867,394	-	2,701,095,797	71.3	4.684%
23	2046	-	126,529,267	-	2,827,625,064	71.3	4.684%
24	2047	-	132,456,364	-	2,960,081,427	71.3	4.684%
25	2048	-	133,817,230	-	3,093,898,657	71.3	4.521%
26	2049	-	134,803,887	-	3,228,702,544	71.3	4.357%
27	2050	-	134,741,101	-	3,363,443,645	71.3	4.173%
28	2051	-	139,576,527	-	3,503,020,173	71.3	4.150%
29	2052	-	145,303,656	-	3,648,323,829	71.3	4.148%
30	2053	-	148,459,891	134,130,000	3,662,653,720	71.3	4.145%
31	2054		145,839,942	267,385,000	3,541,108,662	68.7	4.133%
32	2055		139,240,183	333,387,000	3,346,961,845	63.2	4.126%
33	2056		133,706,081	250,760,000	3,229,907,926	55.8	4.150%
34	2057		129,460,068	226,142,000	3,133,225,994	49.5	4.154%
35	2058		125,436,420	223,930,000	3,034,732,414	43.3	4.152%
36	2059		123,677,522	130,804,000	3,027,605,936	36.6	4.165%
37	2060		124,569,851	83,715,000	3,068,460,786	32.3	4.172%
38	2061		126,405,186	79,635,000	3,115,230,972	29.3	4.174%
39	2062		130,018,532	21,166,000	3,224,083,504	26.3	4.188%
40	2063		134,897,924	10,036,000	3,348,945,428	25.5	4.191%
41	2064		140,125,165	10,327,000	3,478,743,593	25.1	4.191%
42	2065		145,560,750	10,573,000	3,613,731,343	24.8	4.191%
43	2066		151,212,942	10,853,000	3,754,091,286	24.4	4.191%
44	2067		157,090,199	11,140,000	3,900,041,484	24.0	4.191%
45	2068		163,200,744	11,465,000	4,051,777,228	23.6	4.191%
46	2069		169,555,428	11,739,000	4,209,593,657	23.1	4.191%
47	2070		176,163,963	12,051,000	4,373,706,620	22.7	4.191%

COMANCHE PEAK POWER COMPANY LLC
ANNUAL PROJECTED FUNDING REQUIREMENT
2025 Funding Analysis

II. PROJECTED ANNUAL SUMMARY - CP2

Line	Year (A)	Contributions (B)	Net Fund Earnings (C)	Decommissioning Outlays (D)	Fund Accumulation (E)	Weighted Avg Life (F)	Net Return (G)
48	2071		183,036,293	12,371,000	4,544,371,913	22.3	4.191%
49	2072		190,182,152	12,732,000	4,721,822,064	21.9	4.191%
50	2073		197,614,169	13,039,000	4,906,397,233	21.4	4.191%
51	2074		205,343,790	13,385,000	5,098,356,023	21.0	4.191%
52	2075		213,382,677	13,743,000	5,297,995,700	20.6	4.191%
53	2076		221,742,323	14,145,000	5,505,593,023	20.1	4.191%
54	2077		230,437,544	14,485,000	5,721,545,567	19.6	4.191%
55	2078		239,481,746	14,871,000	5,946,156,314	19.2	4.191%
56	2079		248,888,694	15,268,000	6,179,777,007	18.7	4.191%
57	2080		258,671,970	15,715,000	6,422,733,977	18.2	4.191%
58	2081		268,848,852	16,092,000	6,675,490,830	17.8	4.191%
59	2082		279,435,134	16,521,000	6,938,404,964	17.3	4.191%
60	2083		290,447,015	16,961,000	7,211,890,978	16.8	4.191%
61	2084		301,900,528	17,457,000	7,496,334,507	16.3	4.191%
62	2085		313,815,838	17,877,000	7,792,273,344	15.8	4.191%
63	2086		326,211,509	18,353,000	8,100,131,853	15.3	4.191%
64	2087		339,106,598	18,843,000	8,420,395,451	14.8	4.191%
65	2088		352,520,018	19,395,000	8,753,520,469	14.3	4.191%
66	2089		366,475,335	19,862,000	9,100,133,804	13.8	4.191%
67	2090		380,994,379	20,392,000	9,460,736,183	13.2	4.191%
68	2091		396,099,627	20,936,000	9,835,899,810	12.7	4.191%
69	2092		411,813,348	21,551,000	10,226,162,158	12.2	4.191%
70	2093		428,163,114	22,070,000	10,632,255,272	11.6	4.191%
71	2094		445,174,577	22,661,000	11,054,768,850	11.1	4.191%
72	2095		462,874,192	23,266,000	11,494,377,041	10.6	4.192%
73	2096		481,288,307	23,949,000	11,951,716,348	10.0	4.192%
74	2097		500,449,132	24,527,000	12,427,638,480	9.5	4.192%
75	2098		520,386,865	25,183,000	12,922,842,345	8.9	4.192%
76	2099		541,132,649	25,856,000	13,438,118,995	8.4	4.192%
77	2100		562,719,606	26,548,000	13,974,290,601	7.8	4.192%
78	2101		585,182,182	27,260,000	14,532,212,783	7.3	4.192%
79	2102		608,556,339	27,989,000	15,112,780,122	6.7	4.192%
80	2103		632,879,448	28,740,000	15,716,919,570	6.2	4.192%
81	2104		658,188,197	29,585,000	16,345,522,766	5.7	4.192%
82	2105		684,526,743	30,300,000	16,999,749,509	5.1	4.192%
83	2106		711,936,899	31,111,000	17,680,575,408	4.6	4.192%
84	2107		740,461,786	31,945,000	18,389,092,194	4.1	4.192%
85	2108		770,144,621	32,887,000	19,126,349,815	3.6	4.192%
86	2109		769,766,312	33,682,000	19,862,434,127	3.2	4.028%
87	2110		766,927,944	34,586,000	20,594,776,071	2.7	3.865%
88	2111		761,542,765	35,514,000	21,320,804,836	2.3	3.701%
89	2112		788,395,125	36,561,000	22,072,638,961	1.9	3.701%
90	2113		816,207,428	37,446,000	22,851,400,389	1.6	3.701%
91	2114		841,348,755	170,783,000	23,521,966,144	1.3	3.696%
92	2115		661,926,809	140,815,000	24,043,077,954	0.5	2.823%
93	2116						
94	Totals	5,011,638	26,136,649,427	3,126,496,000			

COMANCHE PEAK POWER COMPANY LLC
ANNUAL PROJECTED FUNDING REQUIREMENT
2025 Funding Analysis

II. PROJECTED ANNUAL SUMMARY - CP2

Line	Year (A)	Contributions (B)	Net Fund Earnings (C)	Decommissioning Outlays (D)	Fund Accumulation (E)	Weighted Avg Life (F)	Net Return (G)

NOTES: (Section 4, Part II)

Line 1 Net After-tax Market Value of the Trust at December 31, 2024. (See Section 1, Part I, line 7)

Line 2 Current contributions for 9 months with new rates implemented on 9/1/25. (Contributions lag by one month)

Columns

(B) Assumes new rates are implemented and continue until the end of each unit's license.

(C) Fund earnings are net of projected expenses and taxes. (C) = [previous (E) + [(B) - (D)] / 2] * Return

(D) Decommissioning Cost from Section 3, Part II.

(E) Column (E) = Previous year (E) + Current year (B) + Current year (C) - Current year (D).

(F) Weighted Average Life (See Column (G) on Section 2, Part I & II)

CP1 = Comanche Peak Nuclear Power Plant Unit #1

CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
2025 Funding Analysis

III. CONTRIBUTION SUMMARY - CPNPP

Line	Description	CP 1	CP 2	Total
1	Average annual amounts currently being collected	16,104,328	6,682,184	22,786,512
2	Current Contribution Allocation	70.7%	29.3%	100.0%
3	Annual funding amount determined in this nuclear decommissioning Funding Analysis	-	-	-
4	Contribution Allocation	0.0%	0.0%	100.0%
5	Change in annual contributions determined in this Analysis	<note>	<note>	<note>
6	Funding Analysis Conclusions:			
7	(A) Change the allocation of collections between Unit #1 and Unit #2 as shown above.			
8	(B) Change from the current actual contributions to amounts determined in this study			

NOTES: (Section 4, Part III)

Line 1-2 represents the average annual collections over the last five years. (See Section 1, Part IV)
Line 3-4 represents the new collection rate calculated in this Funding Analysis and the allocation between units
Line 6-8 Funding Analysis conclusions

<note>
Conclusion indicates that the annual collections should be discontinued at least until the next five-year study is completed in 2030. Based on previous studies, our analysis is projecting that we will continue to collect from Oncor through September 2025 at the current rate, however, this date may change depending on the PUCT's schedule.

CPNPP = Comanche Peak Nuclear Power Plant
CP1 = Comanche Peak Nuclear Power Plant Unit #1
CP2 = Comanche Peak Nuclear Power Plant Unit #2

COMANCHE PEAK POWER COMPANY LLC
NUCLEAR DECOMMISSIONING TRUST

EFFECTIVE DATE: October 1, 2021

INVESTMENT POLICY

I. Statement of Purpose

The purpose of this Investment Policy Statement ("IPS") is to define the policies for the investment management and investment oversight of the Comanche Peak Power Company LLC ("Company") Nuclear Decommissioning Trust ("Fund"). The IPS sets forth the objectives for the Fund and the strategies to achieve those objectives; overall investment policies for the Fund; procedures to monitor and control the portfolio; and the delineation of duties for those responsible for management, investment, and oversight.

The IPS is intended to comply with the prudent man investment standards. As such, investment managers are hereby instructed to act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent man acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims. Additionally, the policy limits contained herein are not so absolute as to require the investment manager to take any action contrary to that dictated prudence.

This IPS may not be modified except by approval of the Company Nuclear Decommissioning Trust Committee ("Committee").

II. Fund Objectives

The Fund's primary objective is to satisfy Company nuclear decommissioning obligations and expenses in compliance with the requirements of the Nuclear Regulatory Commission ("NRC"), the Internal Revenue Service ("IRS"), the Public Utility Commission of Texas ("Commission") and the provisions of the Trust Agreement, as amended. Furthermore:

- Assets of the Fund shall be invested with a goal of earning a reasonable return commensurate with the need to preserve the value of the assets of the Fund;
- In keeping with prudent investment practices, the portfolio of securities held in the Fund shall be diversified to the extent reasonably feasible given the size of the Funds;
- In selecting investments, the impact of the investment on the volatility and expected return of the assets of the Funds, net of fees, commissions, expenses, and taxes should be considered;
- The assets of the Fund shall be allocated with an acceptable level of risk taking into account market conditions, remaining time horizon before commencement and completion of decommissioning, and the funding status of the Fund.

III. Responsibilities

The Committee is responsible for the oversight and management of the Fund`s investments. The Committee, may, at its discretion, retain the services of consultants and other service providers (an "Advisor") to assist the Committee in discharging its obligations for the plan.

The Committee agrees that in carrying out its responsibilities it will:

- Retain the right to replace an Advisor;
- Work with an Advisor to establish a framework for the management of the Fund's assets;
- Make determinations whether fee schedules of the Advisor are reasonable;
- Investigate and determine whether past administration of Fund by the Advisor has been reasonable and suitable;
- Review periodically, and revise as appropriate, the provisions of this IPS;
- Ensure that total trustee and investment manager fees paid on an annual basis by the Fund for the entire portfolio, including any comingled funds, shall not exceed 0.7% of the entire portfolio`s average annual balance;
- Ensure that Fund is managed so that funds are available at the time of decommissioning; and

- Periodically review the performance of the Fund's investments.

Advisor is responsible for the following:

- Assumption of discretion over Fund assets for manager selection, rebalancing and implementation of this IPS, as approved;
- Asset and liability analysis;
- Advising the Committee regarding IPS development;
- Assisting the Committee with the maintenance of the IPS;
- Investment manager structure analysis;
- Investment manager search and selection, including investigation and determination of suitability and financial strength;
- Monitor and report to the Committee the total trustee and investment manager fees paid on an annual basis by the Fund for the entire portfolio, including any comingled funds, to help Committee ensure that such fees shall not exceed 0.7% of the entire portfolio's average annual balance;
- Performance measurement analysis and quarterly investment performance reports;
- Periodic meetings with the Committee.

The Advisor agrees that in carrying out its responsibilities it will act only within the framework established by the Committee and outlined in this IPS, and promptly inform the Committee of any recommended changes to the asset allocation, investment strategies, or investment managers.

IV. Asset Allocation

The table below outlines the Fund's target allocation for both equity and fixed income allocations. The Advisor will monitor the Fund's position with respect to the allocation outlined below, making asset allocation and manager/strategy changes to the Fund as appropriate. The Advisor will notify the Committee when asset allocation or manager/strategy changes have taken place. This is done to keep the Committee informed regarding the actions taken by the Advisor to execute the IPS.

Asset Mix

Asset Class	Minimum	Normal	Maximum
Equity	**0%**	**60%**	**60%**
Domestic	0%	40%	60%
Non US	0%	20%	25%
Fixed Income and Cash	**40%**	**40%**	**100%**
Fixed Income	**35%**	**40%**	**100%**
Government/Credit Bonds	30%	35%	100%
Treasury Inflation-Protected Securities	0%	5%	10%
Cash	**0%**	**0%**	**5%**

The guidelines and objectives in this IPS outline an asset allocation that the Committee has determined is appropriate for managing the Fund assets. Furthermore, in developing this asset allocation, the Committee and its Advisor considered the following:

- Broad economic factors;
- Historical and prospective information regarding the capital market performance;
- Applicable investment strategies; and
- The current regulatory environment and liabilities of the Fund.

The Committee recognizes that as market, regulatory, and business conditions change, this allocation may require adjustments. The Advisor will, on an ongoing basis, monitor these conditions and may recommend amendments to the allocation.

Rebalancing

Execution of asset class rebalancing must account for the tax impact to the Fund. Rebalancing may be implemented through any combination of the following actions: a) purchase/sale of securities, b) allocation of new contributions. If market fluctuations raise the equity allocation above the maximum, new contributions are to be allocated to Fixed Income until the Asset Mix is back to the Normal allocation. Reallocation of current investments may also be considered for moving toward Normal allocations, if judged prudent.

V. Performance Objectives

The performance objective of the Fund is to provide a competitive, after-tax return on Fund assets, while at the same time preserving the value of the assets in the Fund within the risk tolerance established by the Committee.

The table below summarizes the performance targets for the investments relative to the market-based benchmarks indicated. In each case, the comparison of actual performance relative to benchmark is done on an after-tax, net of fees basis.

After-tax, net of fees performance targets for total fund and by asset class:

	ANNUAL PERFORMANCE TARGET (BASIS POINT SPREAD OVER BENCHMARK)	BENCHMARK
Total Fund	+10	Weighted average of asset class benchmarks
Domestic Equity	+5	S&P 500
Non US Equity	+5	MSCI EAFE
Government/Credit Bonds	+25	Bloomberg Barclays U.S. Govt/Credit
Treasury Inflation-Protected Securities	+5	Bloomberg Barclays U.S. 10+ Year TIPS

VI. Selection and Retention Criteria for Investment Managers or Funds

The Advisor will make all decisions regarding retention, replacement, or elimination of managers, funds, or investment strategies for the Fund; however, Committee shall retain the right to remove or replace investment managers, institutional trustees or Advisor at its discretion. The Advisor will incorporate an understanding of the Committee's short and long-term investment objectives, as well as the guidelines of this IPS, when making investment decisions. The Advisor will inform the Committee with respect to these decisions.

The Advisor recognizes that decisions regarding managers are always prospective. Factors considered when making changes to manager structure include (but are not limited to) the following:

- Investment results compared to appropriate benchmarks and peer groups;
- Consistency of investment philosophy and process;
- Stability of portfolio management team, including research support;
- Change in firm ownership, management, and incentives for key professionals;
- Financial stability and strength for purposes of liability.

Other areas of consideration include the following:

- Legal or regulatory issues;
- Adherence to investment guidelines;
- Assets under management;
- Client service;
- Investment fees.

VII. Investment Guidelines

Each investment manager appointed by the Committee to execute the IPS will invest Fund assets as prescribed by the Committee in accordance with this IPS and its judgments concerning relative investment values. In particular, the investment manager is accorded full discretion, within policy limits contained herein and guidelines of the manager's investment management agreement, to (1) select individual securities, (2) make periodic adjustments to the proportions of investment mediums for which the investment manager is responsible and (3) diversify Fund assets, to best attain the investment objectives.

The investments are limited to common stocks; preferred stocks; collective trust funds; pooled investment funds, including real estate; government securities; corporate bonds, including convertibles; obligations of a state or local government; and short-term money market instruments. No investments shall be initiated in collective trust funds and pooled investment funds without prior approval by the Committee or its designated representative. Any other investment mediums that the investment manager deems appropriate, not previously permitted by this IPS, may be presented by the investment manager to the Committee. The investment managers are authorized to maintain cash equivalents in United States Treasury bills and/or interest bearing instruments, subject to rating

requirements set out in the Fixed-Income Investments section of this IPS.

Tax Considerations

1. The investment manager should manage the assets with the current and prospective tax rates and their impact taken into consideration with the objective of maximizing returns on an after-tax basis.
2. The applicable tax rate for the qualified trust is 20%. The tax rate is the same for both income and capital gains.
3. Tax deductible expenses incurred by the Fund may be offset by taxable investment income.

General Considerations

1. All trust investments must comply with the guidelines set forth by Commission Substantive Rule 25.303, which can be found at their web site: https://www.puc.texas.gov/agency/rulesnlaws/subrules/electric/25.303/25.303.pdf
2. There is no requirement for the investment managers to maintain significant liquid reserves. However, from time to time, as the Committee may determine, portions of an investment manager's account may be called upon for payment of decommissioning related expenses.
3. Security trades shall be made with an emphasis on highest net proceeds or lowest net cost.
4. The Fund should be diversified with at least 20 different issues of securities and, with the exception of securities issued by the United States Government, the securities of a single issuer shall not represent more than 5% of the market value of the total portfolio.
5. There shall be no investments in securities of the Company or any of its subsidiaries, nor shall the investment manager invest in any equity or debt instrument of its own or that of any of its affiliates; however, collective trust funds or pooled investment funds in which such securities are held are not so restricted.
6. There shall be no trading of warrants or other options, including puts, calls and straddles, except when acquired as a result of the purchase of another security, or in the case of options, when sold as part of a covered position.
7. The use of leverage to purchase securities or the purchase of securities on the margin

is prohibited.

Domestic Equity Investments

1. The objective of the equity investments is to match the performance of the S&P 500 Index through replicating the holdings and weightings of the S&P 500 Index.
2. Investments in issues convertible to common stock shall be considered equities for asset mix and performance measurement except as previously agreed to, in writing, by the investment manager and the Committee, or its designated representative.
3. At least 70% of the aggregate (domestic plus non-US) equity portfolio, based on market value, must have a quality ranking from a major rating service. The rated portion of the domestic portfolio must have a composite quality ranking at least equivalent to that of the S&P 500 index.
4. The Fund should not invest in equity securities of companies with capitalizations of less than $100 million.

Non US Equity Investments

1. The objective of the equity investments is to match the performance of the MSCI EAFE Index through replicating the holdings and weightings of the MSCI EAFE Index.
2. Investments in issues convertible to common stock shall be considered equities for asset mix and performance measurement except as previously agreed to, in writing, by the investment manager and the Committee, or its designated representative.
3. At least 70% of the aggregate (domestic plus non-US) equity portfolio, based on market value, must have a quality ranking from a major rating service. The rated portion of the non-US portfolio must have a composite quality ranking at least equivalent to that of the MSCI EAFE index.
4. The Fund should not invest in equity securities of companies with capitalizations of less than $100 million.

Fixed-Income Investments

1. The Fund shall not invest in corporate or municipal debt securities that have a bond rating below investment grade ("BBB-" by Standard & Poor's Corporation or "Baa3" by Moody's Investor's Service) at the time that the securities are purchased.

2. The overall portfolio of debt instruments shall have a quality level not below a "AA" grade by Standard & Poor's Corporation or "Aa2" by Moody's Investor's Service. In calculating the quality of the overall portfolio, debt securities issued by the Federal government shall be considered as having a "AAA" rating.
3. As a general rule, the municipal portfolio should be broadly diversified as to geography and issuer as well as security type.
4. Investment should be in investment grade, readily marketable fixed income securities including, but not limited to, obligations of the U.S. Government and its agencies, Treasury Inflation-Protected Securities, domestic and foreign corporations, municipalities and municipal agencies, supranational entities, mortgage related and asset-backed securities.
5. Foreign investments may include obligations of governments other than the United States, other foreign governmental and public sector agencies, international organizations and agencies, foreign corporations and banks, rated "BBB-" / "Baa3" or higher.
6. No more than 20% of the market value of the portfolio may be invested in non-dollar denominated fixed income securities. No more than 10% of the market value of the portfolio may be exposed to foreign currency fluctuation, i.e., any amount above 10% must be hedged into U.S. dollars.

Cash Equivalents

1. In addition to the applicable restrictions under fixed-income investments, diversification must be maintained. Cash-equivalent investments shall be made with concern for quality over return or yield.
2. Investments should be high quality, readily marketable money market securities including, but not limited to, Treasury bills, commercial paper rated A1 or P1, certificates of deposit and bankers' acceptance of domestic and foreign banks, and repurchase agreements purchased from primary dealers.
3. Investment in time or demand deposits must be with banks incorporated within the United States ranked in the top 100 and/or non-United States banks located in the United States of comparable size and quality. Such investments should be made in the short-term obligations of banks rated "P1" by Moody's Investor Service or an

equivalent rating of any other nationally rated service.

Derivatives

1. The use of derivative securities in the Fund is limited to those whose purpose is to enhance returns of the Fund without a corresponding increase in risk or to reduce risk of the portfolio.
2. Derivatives may not be used to increase the value of the portfolio by any amount greater than the value of the underlying securities.
3. Prohibited derivative securities include, but are not limited to, mortgage strips; inverse floating rate securities; leveraged investments or internally leveraged securities; residual and support tranches of collateralized mortgage obligations; tiered index bonds or other structured notes whose return characteristics are tied to non-market events; uncovered call/put options; large counter-party risk through over-the-counter options, forwards and swaps; and instruments with similar high-risk characteristics.

VIII. Proxy Voting

Investment managers have been given the responsibility for voting proxy issues on securities held in their respective portfolios and such votes should be commensurate with the objectives of the Fund and this IPS.

IX. Brokerage

Brokerage commissions, incurred in the normal course of trading securities, are expenses of the Fund, and as such, are subject to the total portfolio expense limitation set forth in this IPS. Investment managers will have discretion and should seek "best execution" services.

X. Review Process

Policy Review

It is recognized that changes to the investment objective and policies of the Fund may be in order from time to time to ensure that it accurately reflects the Committee's views.

Performance Review

The Committee, or its representative, shall meet with the representative(s) of the investment manager(s) at least annually to review performance.

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Reporting

The investment manager shall keep accurate records of all investments and other transactions hereunder, and all records relating thereto shall be open at all reasonable times to inspection and audit by any person or persons designated by the Committee or by the Board of Directors of the Company.

The trustee shall submit quarterly reports detailing investment holdings, account transactions and performance results. Individual transactions advices will be sent as requested. The trustee shall keep accurate records of all investments, receipts and disbursements and other transactions hereunder, and all records relating thereto shall be open at all reasonable times to inspection and audit by any person or persons designated by the Committee or by the Board of Directors of the Company.

Within 60 days following the close of the Fund's fiscal year (or following the close of such other annual period as may be agreed upon by the investment manager and the Committee) the trustee shall file a written report setting forth all securities and other property purchased and sold; all receipts, disbursements and other transactions effected by it during such annual period; and showing the securities and other property held at the end of such period.