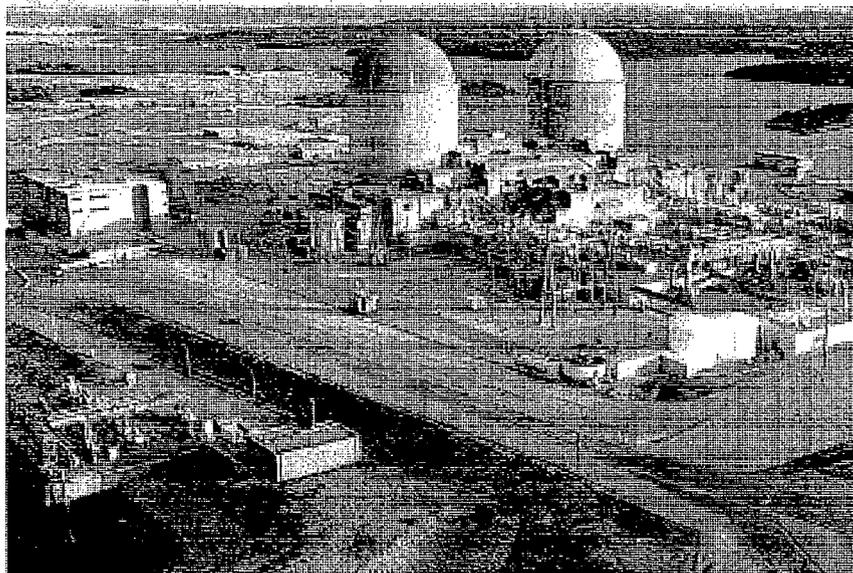


# **Attachment B**

**FINANCIAL ESCALATION ANALYSIS**  
**for the**  
**COMANCHE PEAK NUCLEAR POWER PLANT**



*prepared for*

**Luminant Generation Company, LLC**

*prepared by*

**TLG Services, Inc.**  
Bridgewater, Connecticut

**June 2010**

APPROVALS

Project Manager	<u>William A. Cloutier, Jr.</u> William A. Cloutier, Jr.	<u>June 11, 2010</u> Date
Project Engineer	<u>John A. Carlson</u> John A. Carlson	<u>6/11/2010</u> Date
Technical Manager	for <u>William A. Cloutier, Jr.</u> Francis W. Seymore	<u>June 11, 2010</u> Date

**REVISION LOG**

No.	Date	Item Revised	Reason for Revision
0	06-11-2010		Original Issue

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## 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 base case, in which the nuclear units are expected to operate for 40 years. The baseline estimates (in 2009 dollars)<sup>[1]</sup> were adjusted for the required contingency ceiling and escalated using the IHS Global Insight (GI) forecast and other historical information. A twenty-five year moving average was used for future years beyond the current forecast horizon of the GI 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 Processing & Disposal*, and *Other*. The appropriate escalation index for each of the five escalation categories was 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 7 and 8).
- 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 extracted from Global Insight's Cost Analyzer Version 3.0 using fourth quarter 2009 projections.

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<sup>1</sup> "Decommissioning Cost Study for the Comanche Peak Nuclear Power Plant," Document No. L11-1621-001, TLG Services, Inc., June 2010

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

A long-term disposal agreement with EnergySolutions for disposal services includes a provision for the future adjustment in rates (decrease or increase). The index identified in this agreement was used to escalate low-level radioactive waste disposal costs as well as waste recycling costs to the year of expenditure.

**TABLE 1**  
**ESCALATION SUMMARY**  
 (millions of dollars)

Unit	Decommissioning		Baseline Cost (2009 \$)	Adjusted Cost * (2009 \$)	Escalated Value (escalated \$)	Effective Escalation Rate
	Start	End				
<b>40 Year Operating Life</b>						
Unit 1	2030	2065	564.156	523.783	1,059.289	2.5248%
Unit 2	2033	2065	660.279	614.162	1,292.156	2.5043%

\* 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**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE**  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
(thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	40,171	1,963	1,249	27	3,085	46,495
2031	53,519	13,918	2,067	21,734	19,728	110,964
2032	49,121	19,855	1,324	44,367	9,222	123,889
2033	29,244	10,261	1,066	6,770	4,140	51,481
2034	27,411	9,376	1,042	3,292	3,671	44,792
2035	19,351	7,623	667	3,472	4,743	35,856
2036	1,948	2,441	0	4	1,002	5,396
2037	1,943	2,434	0	4	1,000	5,381
2038	1,943	2,434	0	4	1,000	5,381
2039	12,613	1,684	164	14	2,155	16,628
2040	12,531	6,927	162	3	1,775	21,398
2041	11,014	8,035	139	0	1,536	20,724
2042	3,122	1,335	22	0	844	5,322
2043	1,661	95	0	0	715	2,472
2044	1,666	95	0	0	717	2,478
2045	1,661	95	0	0	715	2,472
2046	1,661	95	0	0	715	2,472
2047	1,661	95	0	0	715	2,472
2048	1,666	95	0	0	717	2,478
2049	1,661	95	0	0	715	2,472
2050	1,661	95	0	0	715	2,472
2051	1,661	95	0	0	715	2,472
2052	1,666	95	0	0	717	2,478
2053	1,661	95	0	0	715	2,472
2054	1,661	95	0	0	715	2,472
2055	1,661	95	0	0	715	2,472
2056	1,666	95	0	0	717	2,478
2057	1,661	95	0	0	715	2,472
2058	1,661	95	0	0	715	2,472
2059	1,661	95	0	0	715	2,472
2060	1,666	95	0	0	717	2,478
2061	1,661	95	0	0	715	2,472
2062	1,661	95	0	0	715	2,472

TABLE 2 (continued)  
 COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1  
 DECON ALTERNATIVE  
 SCHEDULE OF TOTAL ANNUAL EXPENDITURES  
 (thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	1,661	95	0	0	715	2,472
2064	1,662	603	0	4	13,180	15,449
2065	819	827	0	460	956	3,061
	301,321	91,709	7,900	80,156	83,070	564,156

**TABLE 3**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE**  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
(thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	42,059	7,235	1,272	27	2,887	53,480
2034	54,983	19,318	2,066	20,650	12,425	109,442
2035	54,915	24,158	1,320	39,812	7,009	127,214
2036	44,073	9,908	1,058	7,114	3,154	65,307
2037	43,418	9,186	1,042	5,500	2,957	62,104
2038	38,422	8,146	841	6,035	3,609	57,054
2039	26,918	3,616	392	2,803	4,730	38,459
2040	17,985	14,056	162	3	2,090	34,297
2041	16,780	16,475	139	0	1,539	34,933
2042	4,022	2,653	22	0	844	7,541
2043	1,661	95	0	0	715	2,472
2044	1,666	95	0	0	717	2,478
2045	1,661	95	0	0	715	2,472
2046	1,661	95	0	0	715	2,472
2047	1,661	95	0	0	715	2,472
2048	1,666	95	0	0	717	2,478
2049	1,661	95	0	0	715	2,472
2050	1,661	95	0	0	715	2,472
2051	1,661	95	0	0	715	2,472
2052	1,666	95	0	0	717	2,478
2053	1,661	95	0	0	715	2,472
2054	1,661	95	0	0	715	2,472
2055	1,661	95	0	0	715	2,472
2056	1,666	95	0	0	717	2,478
2057	1,661	95	0	0	715	2,472
2058	1,661	95	0	0	715	2,472
2059	1,661	95	0	0	715	2,472
2060	1,666	95	0	0	717	2,478
2061	1,661	95	0	0	715	2,472
2062	1,661	95	0	0	715	2,472
2063	1,661	95	0	0	715	2,472
2064	1,662	603	0	4	13,180	15,449

**TABLE 3 (continued)**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE**  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
 (thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2065	819	827	0	460	956	3,061
	380,968	118,172	8,313	82,410	70,415	660,279

**TABLE 4**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
(thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	37,767	1,831	1,174	24	2,942	43,738
2031	49,836	12,674	1,943	19,424	18,451	102,328
2032	45,346	17,873	1,245	39,489	8,662	112,614
2033	27,321	9,514	1,002	6,137	3,917	47,890
2034	25,659	8,742	980	3,051	3,478	41,911
2035	18,072	7,102	627	3,215	4,484	33,499
2036	1,832	2,292	0	4	960	5,087
2037	1,827	2,286	0	4	957	5,074
2038	1,827	2,286	0	4	957	5,074
2039	11,706	1,560	154	12	2,049	15,481
2040	11,738	6,506	152	3	1,683	20,083
2041	10,355	7,554	131	0	1,457	19,496
2042	2,935	1,255	20	0	805	5,016
2043	1,562	89	0	0	685	2,336
2044	1,566	89	0	0	687	2,342
2045	1,562	89	0	0	685	2,336
2046	1,562	89	0	0	685	2,336
2047	1,562	89	0	0	685	2,336
2048	1,566	89	0	0	687	2,342
2049	1,562	89	0	0	685	2,336
2050	1,562	89	0	0	685	2,336
2051	1,562	89	0	0	685	2,336
2052	1,566	89	0	0	687	2,342
2053	1,562	89	0	0	685	2,336
2054	1,562	89	0	0	685	2,336
2055	1,562	89	0	0	685	2,336
2056	1,566	89	0	0	687	2,342
2057	1,562	89	0	0	685	2,336
2058	1,562	89	0	0	685	2,336
2059	1,562	89	0	0	685	2,336
2060	1,566	89	0	0	687	2,342
2061	1,562	89	0	0	685	2,336
2062	1,562	89	0	0	685	2,336

TABLE 4 (continued)  
 COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1  
 DECON ALTERNATIVE, CONTINGENCY ADJUSTED \*  
 SCHEDULE OF TOTAL ANNUAL EXPENDITURES  
 (thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	1,562	89	0	0	685	2,336
2064	1,563	576	0	4	12,403	14,546
2065	769	777	0	418	900	2,865
	281,373	84,701	7,427	71,789	78,493	523,783

\* 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**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
(thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	39,578	6,794	1,197	25	2,753	50,346
2034	51,315	17,690	1,944	18,464	11,716	101,128
2035	50,815	21,903	1,242	35,430	6,596	115,987
2036	41,220	9,165	996	6,533	2,990	60,903
2037	40,634	8,518	981	5,107	2,806	58,045
2038	35,909	7,549	791	5,599	3,419	53,267
2039	24,964	3,331	369	2,598	4,473	35,736
2040	16,854	13,218	153	3	1,981	32,209
2041	15,790	15,503	131	0	1,460	32,884
2042	3,785	2,496	20	0	806	7,108
2043	1,563	89	0	0	685	2,338
2044	1,568	89	0	0	687	2,344
2045	1,563	89	0	0	685	2,338
2046	1,563	89	0	0	685	2,338
2047	1,563	89	0	0	685	2,338
2048	1,568	89	0	0	687	2,344
2049	1,563	89	0	0	685	2,338
2050	1,563	89	0	0	685	2,338
2051	1,563	89	0	0	685	2,338
2052	1,568	89	0	0	687	2,344
2053	1,563	89	0	0	685	2,338
2054	1,563	89	0	0	685	2,338
2055	1,563	89	0	0	685	2,338
2056	1,568	89	0	0	687	2,344
2057	1,563	89	0	0	685	2,338
2058	1,563	89	0	0	685	2,338
2059	1,563	89	0	0	685	2,338
2060	1,568	89	0	0	687	2,344
2061	1,563	89	0	0	685	2,338
2062	1,563	89	0	0	685	2,338
2063	1,563	89	0	0	685	2,338
2064	1,564	576	0	4	12,414	14,559

TABLE 5 (continued)  
 COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2  
 DECON ALTERNATIVE, CONTINGENCY ADJUSTED \*  
 SCHEDULE OF TOTAL ANNUAL EXPENDITURES  
 (thousands, 2009 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2065	770	778	0	419	901	2,867
	356,049	109,397	7,823	74,182	66,711	614,162

\* 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	IHS Global Insight Forecast Database, Employment Cost Index, Compensation All Private Industry Workers (ECIPCTNS)
Equipment and Materials	IHS Global Insight Forecast Database, Producer Price Index, Machinery & Equipment (WPIP11)
Energy	IHS Global Insight Forecast Database, Producer Price Index, Fuels and Related Products and Power (WPIP05)
Other	IHS Global Insight Forecast Database, Consumer Price Index, Services (CUSASNS)
Low-Level Radioactive Waste Processing/Disposal	As specified in the Long Term Disposal Agreement between TXU-Generation Company, LP and EnergySolutions, LLC

**TABLE 7  
 COMPONENT ESCALATION SUMMARY**

	Escalated Costs (\$ thousands)		Average Effective Escalation Rate	
	Unit 1	Unit 2	Unit 1	Unit 2
Labor	621,000	825,324	2.8787%	2.8817%
Equipment and Materials	88,097	114,398	0.1486%	0.1565%
Energy	11,069	12,188	1.7036%	1.6835%
Waste Processing and Disposal	134,057	151,662	2.7099%	2.7223%
Other	205,067	188,585	2.7403%	2.7440%
Total	1,059,289	1,292,156	2.5248%	2.5043%

**TABLE 8**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
(thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	68,074	1,876	1,682	43	5,142	76,817
2031	92,526	13,029	2,831	34,917	33,167	176,469
2032	86,706	18,438	1,838	73,008	16,014	196,003
2033	53,814	9,850	1,503	11,670	7,448	84,285
2034	52,047	9,082	1,490	5,968	6,804	75,391
2035	37,709	7,388	969	6,460	9,009	61,536
2036	3,933	2,390	0	8	1,982	8,312
2037	4,037	2,388	0	8	2,031	8,465
2038	4,157	2,393	0	8	2,088	8,645
2039	27,429	1,635	252	28	4,593	33,937
2040	28,320	6,834	252	7	3,878	39,291
2041	25,725	7,948	218	0	3,449	37,340
2042	7,508	1,323	34	0	1,960	10,825
2043	4,114	94	0	0	1,713	5,921
2044	4,248	95	0	0	1,766	6,108
2045	4,362	95	0	0	1,810	6,267
2046	4,491	95	0	0	1,860	6,446
2047	4,624	95	0	0	1,912	6,631
2048	4,774	95	0	0	1,971	6,840
2049	4,902	95	0	0	2,020	7,018
2050	5,047	96	0	0	2,077	7,219
2051	5,196	96	0	0	2,135	7,427
2052	5,365	96	0	0	2,200	7,662
2053	5,509	96	0	0	2,256	7,861
2054	5,672	97	0	0	2,319	8,087
2055	5,840	97	0	0	2,384	8,320
2056	6,029	97	0	0	2,457	8,583
2057	6,190	97	0	0	2,519	8,806
2058	6,374	97	0	0	2,589	9,060
2059	6,562	98	0	0	2,661	9,321
2060	6,775	98	0	0	2,743	9,616
2061	6,956	98	0	0	2,811	9,866
2062	7,162	98	0	0	2,890	10,150

TABLE 8 (continued)  
 COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1  
 DECON ALTERNATIVE, CONTINGENCY ADJUSTED \*  
 SCHEDULE OF TOTAL ANNUAL EXPENDITURES  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	7,374	99	0	0	2,970	10,443
2064	7,597	638	0	16	55,312	63,563
2065	3,850	863	0	1,917	4,127	10,756
	621,000	88,097	11,069	134,057	205,067	1,059,289

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

**TABLE 8A**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF LICENSE TERMINATION EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	66,841	1,433	1,682	43	3,036	73,035
2031	89,656	12,414	2,831	34,917	30,914	170,731
2032	83,951	17,572	1,838	73,008	13,941	190,310
2033	49,734	5,640	1,503	11,670	5,338	73,885
2034	47,726	4,546	1,490	5,968	4,635	64,365
2035	34,354	3,627	969	6,460	7,448	52,858
2036	2,345	77	0	8	1,393	3,823
2037	2,408	77	0	8	1,427	3,920
2038	2,479	77	0	8	1,467	4,032
2039	26,678	627	252	28	3,956	31,540
2040	7,575	166	71	7	2,446	10,265
2041	259	0	0	0	1,825	2,084
2042	42	0	0	0	293	335
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	0	0	0	0	0
2054	0	0	0	0	0	0
2055	0	0	0	0	0	0
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	0	0	0	0	0	0
2061	0	0	0	0	0	0
2062	0	0	0	0	0	0

TABLE 8A (continued)  
 COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1  
 DECON ALTERNATIVE, CONTINGENCY ADJUSTED \*  
 SCHEDULE OF LICENSE TERMINATION EXPENDITURES  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	0	0	0	0	0	0
2064	0	540	0	0	52,249	52,790
2065	0	0	0	0	0	0
	414,047	46,798	10,635	132,124	130,368	733,972

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

**TABLE 8B**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES**  
(thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	260	443	0	0	2,106	2,808
2031	351	584	0	0	2,247	3,182
2032	486	786	0	0	2,056	3,327
2033	2,652	4,182	0	0	2,109	8,942
2034	2,937	4,512	0	0	2,169	9,618
2035	2,505	3,747	0	0	1,561	7,813
2036	1,588	2,312	0	0	589	4,489
2037	1,630	2,311	0	0	604	4,544
2038	1,678	2,315	0	0	621	4,614
2039	751	1,008	0	0	638	2,397
2040	3,171	94	36	0	1,430	4,731
2041	3,880	94	44	0	1,621	5,639
2042	3,995	94	7	0	1,667	5,763
2043	4,114	94	0	0	1,713	5,921
2044	4,248	95	0	0	1,766	6,108
2045	4,362	95	0	0	1,810	6,267
2046	4,491	95	0	0	1,860	6,446
2047	4,624	95	0	0	1,912	6,631
2048	4,774	95	0	0	1,971	6,840
2049	4,902	95	0	0	2,020	7,018
2050	5,047	96	0	0	2,077	7,219
2051	5,196	96	0	0	2,135	7,427
2052	5,365	96	0	0	2,200	7,662
2053	5,509	96	0	0	2,256	7,861
2054	5,672	97	0	0	2,319	8,087
2055	5,840	97	0	0	2,384	8,320
2056	6,029	97	0	0	2,457	8,583
2057	6,190	97	0	0	2,519	8,806
2058	6,374	97	0	0	2,589	9,060
2059	6,562	98	0	0	2,661	9,321
2060	6,775	98	0	0	2,743	9,616
2061	6,956	98	0	0	2,811	9,866
2062	7,162	98	0	0	2,890	10,150

**TABLE 8B (continued)**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	7,374	99	0	0	2,970	10,443
2064	7,597	98	0	16	3,063	10,773
2065	3,850	863	0	1,917	4,127	10,756
	154,897	25,466	87	1,932	74,667	257,050

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

**TABLE 8C**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF SITE RESTORATION EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2030	974	0	0	0	0	974
2031	2,518	31	0	0	7	2,556
2032	2,269	80	0	0	18	2,367
2033	1,428	28	0	0	2	1,458
2034	1,384	23	0	0	0	1,408
2035	850	14	0	0	0	864
2036	0	0	0	0	0	0
2037	0	0	0	0	0	0
2038	0	0	0	0	0	0
2039	0	0	0	0	0	0
2040	17,575	6,574	145	0	2	24,296
2041	21,586	7,854	175	0	3	29,618
2042	3,471	1,229	28	0	0	4,728
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	0	0	0	0	0
2054	0	0	0	0	0	0
2055	0	0	0	0	0	0
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	0	0	0	0	0	0
2061	0	0	0	0	0	0
2062	0	0	0	0	0	0

**TABLE 8C (continued)**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 1**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF SITE RESTORATION EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2063	0	0	0	0	0	0
2064	0	0	0	0	0	0
2065	0	0	0	0	0	0
2063	0	0	0	0	0	0
	52,056	15,833	347	0	31	68,268

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

**TABLE 9**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
(thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	77,956	7,034	1,795	47	5,235	92,068
2034	104,087	18,376	2,955	36,117	22,917	184,453
2035	106,031	22,788	1,921	71,190	13,253	215,183
2036	88,511	9,553	1,566	13,490	6,173	119,294
2037	89,818	8,898	1,565	10,838	5,954	117,073
2038	81,722	7,900	1,278	12,213	7,457	110,570
2039	58,496	3,493	603	5,825	10,028	78,445
2040	40,663	13,885	252	7	4,563	59,370
2041	39,227	16,311	219	0	3,457	59,214
2042	9,682	2,631	34	0	1,962	14,310
2043	4,118	94	0	0	1,714	5,926
2044	4,252	95	0	0	1,767	6,113
2045	4,366	95	0	0	1,811	6,272
2046	4,495	95	0	0	1,861	6,452
2047	4,628	95	0	0	1,913	6,637
2048	4,778	96	0	0	1,972	6,846
2049	4,906	96	0	0	2,022	7,024
2050	5,052	96	0	0	2,078	7,225
2051	5,201	96	0	0	2,136	7,433
2052	5,370	96	0	0	2,202	7,668
2053	5,514	96	0	0	2,257	7,867
2054	5,677	97	0	0	2,320	8,094
2055	5,845	97	0	0	2,385	8,327
2056	6,034	97	0	0	2,459	8,590
2057	6,196	97	0	0	2,520	8,814
2058	6,379	98	0	0	2,591	9,067
2059	6,568	98	0	0	2,663	9,329
2060	6,781	98	0	0	2,744	9,624
2061	6,963	98	0	0	2,813	9,874
2062	7,169	98	0	0	2,892	10,159
2063	7,381	99	0	0	2,972	10,452
2064	7,604	639	0	16	55,361	63,619

**TABLE 9 (continued)**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF TOTAL ANNUAL EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2065	3,853	863	0	1,920	4,130	10,767
	825,324	114,398	12,188	151,662	188,585	1,292,156

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

**TABLE 9A**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF LICENSE TERMINATION EXPENDITURES**  
(thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	73,968	1,476	1,795	47	2,900	80,187
2034	99,511	14,349	2,955	36,117	20,471	173,402
2035	100,422	18,875	1,921	71,190	11,004	203,412
2036	83,910	6,732	1,566	13,490	3,875	109,573
2037	85,154	6,133	1,565	10,838	3,599	107,289
2038	78,759	6,104	1,278	12,213	5,781	104,135
2039	58,304	3,266	603	5,825	9,390	77,388
2040	8,804	217	71	7	3,125	12,224
2041	111	0	0	0	1,827	1,938
2042	18	0	0	0	293	311
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	0	0	0	0	0
2054	0	0	0	0	0	0
2055	0	0	0	0	0	0
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	0	0	0	0	0	0
2061	0	0	0	0	0	0
2062	0	0	0	0	0	0
2063	0	0	0	0	0	0
2064	0	541	0	0	52,296	52,837

**TABLE 9A (continued)**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF LICENSE TERMINATION EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2065	0	0	0	0	0	0
	588,960	57,693	11,753	149,727	114,562	922,695

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

**TABLE 9B**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES**  
(thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	3,525	5,558	0	0	2,335	11,417
2034	2,596	3,988	0	0	2,439	9,023
2035	2,551	3,816	0	0	2,230	8,597
2036	1,895	2,760	0	0	2,298	6,953
2037	1,909	2,706	0	0	2,355	6,970
2038	1,277	1,762	0	0	1,676	4,715
2039	169	226	0	0	638	1,033
2040	3,173	94	36	0	1,431	4,735
2041	3,883	94	44	0	1,623	5,643
2042	3,999	94	7	0	1,668	5,767
2043	4,118	94	0	0	1,714	5,926
2044	4,252	95	0	0	1,767	6,113
2045	4,366	95	0	0	1,811	6,272
2046	4,495	95	0	0	1,861	6,452
2047	4,628	95	0	0	1,913	6,637
2048	4,778	96	0	0	1,972	6,846
2049	4,906	96	0	0	2,022	7,024
2050	5,052	96	0	0	2,078	7,225
2051	5,201	96	0	0	2,136	7,433
2052	5,370	96	0	0	2,202	7,668
2053	5,514	96	0	0	2,257	7,867
2054	5,677	97	0	0	2,320	8,094
2055	5,845	97	0	0	2,385	8,327
2056	6,034	97	0	0	2,459	8,590
2057	6,196	97	0	0	2,520	8,814
2058	6,379	98	0	0	2,591	9,067
2059	6,568	98	0	0	2,663	9,329
2060	6,781	98	0	0	2,744	9,624
2061	6,963	98	0	0	2,813	9,874
2062	7,169	98	0	0	2,892	10,159
2063	7,381	99	0	0	2,972	10,452
2064	7,604	98	0	16	3,065	10,782

TABLE 9B (continued)  
 COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2  
 DECON ALTERNATIVE, CONTINGENCY ADJUSTED \*  
 SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2065	3,853	863	0	1,920	4,130	10,767
	154,107	24,086	87	1,935	73,979	254,195

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

**TABLE 9C**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF SITE RESTORATION EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2033	464	0	0	0	0	464
2034	1,981	39	0	0	8	2,028
2035	3,058	97	0	0	19	3,174
2036	2,706	61	0	0	1	2,767
2037	2,755	59	0	0	0	2,814
2038	1,686	35	0	0	0	1,721
2039	23	0	0	0	0	23
2040	28,686	13,574	145	0	7	42,411
2041	35,233	16,217	175	0	8	51,633
2042	5,666	2,537	28	0	1	8,231
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	0	0	0	0	0
2054	0	0	0	0	0	0
2055	0	0	0	0	0	0
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	0	0	0	0	0	0
2061	0	0	0	0	0	0
2062	0	0	0	0	0	0
2063	0	0	0	0	0	0
2064	0	0	0	0	0	0

**TABLE 9C (continued)**  
**COMANCHE PEAK NUCLEAR POWER PLANT, UNIT 2**  
**DECON ALTERNATIVE, CONTINGENCY ADJUSTED \***  
**SCHEDULE OF SITE RESTORATION EXPENDITURES**  
 (thousands of year of expenditure dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2065	0	0	0	0	0	0
	82,257	32,618	347	0	44	115,267

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