

March 27, 2015

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Serial No. 15-098
NL&OS/TJS Rev.0
Docket No. 50-305
License No. DPR-43

DOMINION ENERGY KEWAUNEE, INC.
KEWAUNEE POWER STATION
DECOMMISSIONING FUNDING STATUS REPORT, FINANCIAL TEST AND
INDEPENDENT PUBLIC ACCOUNTANTS' LETTER OF ATTESTATION

Pursuant to 10 CFR 50.75(f)(1) and 10 CFR 50.82(a)(8)(v)-(vii), Dominion Energy Kewaunee, Inc. (DEK) is providing this report on the status of decommissioning funding for Kewaunee Power Station (KPS).

Enclosure 1 provides the following information for KPS:

- Table I - Decommissioning Funding Status Report for KPS
Summary Information as of December 31, 2014
- Table II - Decommissioning Funding Status Report for KPS
Annual Cash Flow Analysis Starting January 1, 2015 through
the End of Decommissioning

The following information is provided in support and as part of this filing:

1. The escalation of decommissioning costs from the Cost Study's 2012 dollars to 2015 dollars is 1.44% and is based upon the average of CPI-U rates for that period. The mnemonics are "FCPIU.US, CPI-U Not Seasonally Adjusted (NSA) All Urban Consumers, All Items US City Average (Index, 1982-84=100, SA)."
2. The escalation of decommissioning costs, shown in Table II "Annual Cash Flow Analysis" with a starting date of January 1, 2015 is held at 0.0% based on assuming 2.0% Real Rate of Return.
3. The growth rate on Trust Funds is held at the allowed 2.0% Real Rate of Return over the escalation rate.
4. No rate regulatory authority citation for KPS is referenced because KPS is a merchant unit.
5. There are no contracts upon which DEK is relying under paragraph 10 CFR 50.75(e)(1)(v) and there were no modifications to the current method of providing financial assurance since the last submitted report.
6. There are no annual funding amounts for KPS.
7. Trust Fund amounts shown in this report are market value and after-tax on realized gains and losses. The Trust Fund balances have not been adjusted for unrealized gain or loss positions not currently taxable.

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8. Since the previous annual submittal on March 31, 2014 (Serial No. 14-117, ADAMS Accession No. ML 14098A259) the only changes to trust agreements established for nuclear decommissioning for KPS were those reported in a letter dated February 18, 2015 (Serial No. 15-089) implementing the exemptions issued by the NRC on May 21, 2014 and correcting an error in the non-qualified trust agreement.

Additionally, in a submittal dated January 28, 2015 (Serial No. 15-001, ADAMS Accession No. ML 15034A312), Dominion Resources, Inc. (DRI) committed to provide ongoing information pertaining to its continuing ability to provide additional financial assurance by submitting by March 31 of each year in connection with DEK's annual financial assurance status report, (1) information demonstrating the results of the financial test in either Paragraph II.A.1 or Paragraph II.A.2 of Appendix A to 10 CFR Part 30 for the immediately preceding calendar year; and (2) a letter from its independent certified public accountant attesting to the data and accuracy of the financial test¹. This information is included in Attachments 1 and 2, respectively.

Please contact Mr. David A. Sommers at (804) 273-2823 if you have any questions or require additional information.

Sincerely,



David A. Heacock
President and Chief Nuclear Officer
Dominion Energy Kewaunee, Inc.

Attachments

Commitments made in this letter: None

cc: U. S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Mr. T. Carter
NRC Senior Project Manager (KPS)
U. S. Nuclear Regulatory Commission, Mail Stop T-8 F5
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

¹DEK is aware that the American Institute of Certified Public Accountants (AICPA) has informed the NRC that certified public accountants are precluded from issuing any form of report or assurance on matters related to solvency. (See ADAMS Accession No. ML 13094A316.)

Enclosure 1

Decommissioning Funding Status Report for KPS
Summary Information as of December 31, 2014

Kewaunee Power Station
Dominion Energy Kewaunee, Inc. (DEK)

**Kewaunee Power Station
 Decommissioning Funding Status Report as of December 31, 2014**

Table I

Decommissioning Funding Status Report for KPS Summary Information as of December 31, 2014 10 CFR 50.82 (a)(8)(v)-(vii) (In millions)						
Decommissioning Trust Fund Balances				10 CFR Reference	50.82(a)(8)(v)(A)	50.82(a)(8)(vii)(A)
Fund Balance	Type of Trusts			Comments		
\$ 688.233	Qualified fund balance			As of:	12/31/2014	
\$ -	Non-qualified fund balance			As of:	12/31/2014	
\$ 52.438	Less costs incurred prior years but not yet billed to Trust			Actual Cost in:	As Spent	Dollars
\$ 635.795	Adjusted decommissioning fund balance			As of:	12/31/2014	
Other Financial Assurance Methods Being Relied Upon				10 CFR Reference	50.82(a)(8)(v)(A)	
None						
Prior Years Decommissioning Expenditures (1)				10 CFR Reference	50.82(a)(8)(v)(A)	
Total	License Term	Spent Fuel Mgmt	Site Restoration	Comments		
\$ 71.729	\$ 40.683	\$ 31.046	\$ -	2014 Cost in:	2014	Dollars
\$ 88.860	\$ 23.221	\$ 65.639	\$ -	2012-2013 Cost in:	As Spent	Dollars
\$ 160.589	\$ 63.905	\$ 96.685	\$ -	Total Prior Year in:	As Spent	Dollars
Prior Year Expenditures - Variance to Estimated Escalated Cost				10 CFR Reference	50.82(a)(8)(v)(B)	
Total	License Term	Spent Fuel Mgmt	Site Restoration	Comments		
\$ 71.729	\$ 40.683	\$ 31.046	\$ -	Actual Cost in:	2014	Dollars
\$ 109.664	\$ 75.304	\$ 34.360	\$ -	NRC Auth. \$ in	2014	Dollars
\$ (37.935)	\$ (34.621)	\$ (3.314)	\$ -			
Variance: License Termination and Spent Fuel Management underruns due to timing of activities.						
Remaining Decommissioning Estimated Cost				10 CFR Reference	50.82(a)(8)(v)(B)	50.82(a)(8)(vii)(B)
Total	License Term	Spent Fuel Mgmt	Site Restoration	Comments		
\$ 732.904	\$ 452.189	\$ 244.384	\$ 36.331	Estimate in :	2015	Dollars
Decommissioning Criteria Upon Which the Estimate is Based				10 CFR Reference	50.82(a)(8)(v)(B)	
SAFSTOR						
Any Modification To Method of Providing Financial Assurance				10 CFR Reference	50.82(a)(8)(v)(C)	
None						
Any Material Changes To Trust Agreement Since Previous Report				10 CFR Reference	50.82(a)(8)(v)(D)	
Yes	See letter dated February 18, 2015 (Serial No. 15-089) implementing NRC Exemption and correction of error.					
Need For Additional Financial Assurance				10 CFR Reference	50.82(a)(8)(vi)	50.82(a)(8)(vii)(C)
None	See Annual Cash Flow Analysis in Table II					
Inputs to Remaining Cost and Funding Analysis						
2015	Start year of analysis					
1.44%	Escalate study dollars from 2012\$ to Start Year of Analysis using CPI average (2012 to Start Year of Analysis)					
0.00%	Escalation rate		2015	& beyond		
2.00%	Fund growth rate		2015	& beyond (Reflects NRC allowed 2% Real Rate of Return)		
Annual expenditures	Projected annual expenditures - see Annual Cash Flow Analysis in Table II					
(1) A reconciliation of 2013 decommissioning costs indicated that expenditures shown as of December 31, 2013, in the previous Decommissioning Funding Status Report (Serial No. 14-117 dated March 31, 2014), were overstated by \$5.416 million. Therefore, the Prior Years Decommissioning Expenditures section is revised in this report to correct the previous overstatement. There was no disbursement of the overstated costs from the Decommissioning Trust Fund.						

**Kewaunee Power Station
 Decommissioning Funding Status Report as of December 31, 2014**

Table II

Decommissioning Funding Status Report for KPS Annual Cash Flow Analysis Starting January 1, 2015 through End of Decommissioning 10 CFR 50.82 (a)(8)(v)-(vii) (in millions)							
Year	Column 1 Beginning of Year Balance	Column 2 Earnings on Trust Funds (Reflects 2% RRoR)	Column 3 Remaining License Termination Expenditures (Reflects 0% Esc)	Column 4 Remaining Spent Fuel Mgmt Expenditures (Reflects 0% Esc)	Column 5 Remaining Site Restoration Expenditures (Reflects 0% Esc)	Column 6 Remaining SAFSTOR Expenditures (Reflects 0% Esc)	Column 7 End of Year Balance
2015	\$ 635.795	\$ 12.361	\$ 4.682	\$ 30.780	\$ -	\$ 35.462	\$ 612.694
2016	\$ 612.694	\$ 11.894	\$ 6.318	\$ 29.638	\$ -	\$ 35.956	\$ 588.632
2017	\$ 588.632	\$ 11.543	\$ 15.566	\$ 7.447	\$ -	\$ 23.013	\$ 577.162
2018	\$ 577.162	\$ 11.469	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 581.200
2019	\$ 581.200	\$ 11.550	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 585.318
2020	\$ 585.318	\$ 11.632	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 589.520
2021	\$ 589.520	\$ 11.716	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 593.805
2022	\$ 593.805	\$ 11.802	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 598.175
2023	\$ 598.175	\$ 11.889	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 602.634
2024	\$ 602.634	\$ 11.978	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 607.181
2025	\$ 607.181	\$ 12.069	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 611.820
2026	\$ 611.820	\$ 12.162	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 616.551
2027	\$ 616.551	\$ 12.257	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 621.376
2028	\$ 621.376	\$ 12.353	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 626.299
2029	\$ 626.299	\$ 12.452	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 631.319
2030	\$ 631.319	\$ 12.552	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 636.440
2031	\$ 636.440	\$ 12.655	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 641.664
2032	\$ 641.664	\$ 12.759	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 646.992
2033	\$ 646.992	\$ 12.857	\$ 2.628	\$ 5.641	\$ -	\$ 8.269	\$ 651.580
2034	\$ 651.580	\$ 12.957	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 657.106
2035	\$ 657.106	\$ 13.068	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 662.743
2036	\$ 662.743	\$ 13.181	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 668.493
2037	\$ 668.493	\$ 13.296	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 674.357
2038	\$ 674.357	\$ 13.413	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 680.339
2039	\$ 680.339	\$ 13.532	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 686.441
2040	\$ 686.441	\$ 13.655	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 692.664
2041	\$ 692.664	\$ 13.779	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 699.012
2042	\$ 699.012	\$ 13.906	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 705.487
2043	\$ 705.487	\$ 14.035	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 712.092
2044	\$ 712.092	\$ 14.168	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 718.828
2045	\$ 718.828	\$ 14.302	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 725.700
2046	\$ 725.700	\$ 14.440	\$ 1.790	\$ 5.641	\$ -	\$ 7.431	\$ 732.708
2047	\$ 732.708	\$ 14.579	\$ 1.790	\$ 5.774	\$ -	\$ 7.564	\$ 739.723
2048	\$ 739.723	\$ 14.727	\$ 1.802	\$ 4.982	\$ -	\$ 6.784	\$ 747.666
2049	\$ 747.666	\$ 14.935	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 760.794
2050	\$ 760.794	\$ 15.198	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 774.185
2051	\$ 774.185	\$ 15.466	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 787.844
2052	\$ 787.844	\$ 15.739	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 801.776
2053	\$ 801.776	\$ 16.017	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 815.987
2054	\$ 815.987	\$ 16.302	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 830.482
2055	\$ 830.482	\$ 16.592	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 845.267
2056	\$ 845.267	\$ 16.887	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 860.347
2057	\$ 860.347	\$ 17.189	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 875.729
2058	\$ 875.729	\$ 17.497	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 891.419
2059	\$ 891.419	\$ 17.810	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 907.423
2060	\$ 907.423	\$ 18.130	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 923.746
2061	\$ 923.746	\$ 18.457	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 940.397
2062	\$ 940.397	\$ 18.790	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 957.380
2063	\$ 957.380	\$ 19.130	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 974.703
2064	\$ 974.703	\$ 19.476	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 992.372
2065	\$ 992.372	\$ 19.829	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 1,010.394
2066	\$ 1,010.394	\$ 20.190	\$ 1.807	\$ -	\$ -	\$ 1.807	\$ 1,028.778
2067	\$ 1,028.778	\$ 20.443	\$ 13.255	\$ -	\$ -	\$ 13.255	\$ 1,035.966
2068	\$ 1,035.966	\$ 20.481	\$ 23.851	\$ -	\$ -	\$ 23.851	\$ 1,032.596
2069	\$ 1,032.596	\$ 20.189	\$ 46.257	\$ -	\$ -	\$ 46.257	\$ 1,006.528
2070	\$ 1,006.528	\$ 19.073	\$ 105.707	\$ -	\$ -	\$ 105.707	\$ 919.894
2071	\$ 919.894	\$ 17.433	\$ 96.464	\$ -	\$ -	\$ 96.464	\$ 840.864
2072	\$ 840.864	\$ 16.190	\$ 51.126	\$ -	\$ 11.648	\$ 62.774	\$ 794.279
2073	\$ 794.279	\$ 15.616	\$ 0.114	\$ 2.163	\$ 24.683	\$ 26.959	\$ 782.936
Remaining \$ in	2015	Dollars	\$ 452.189	\$ 244.384	\$ 36.331	\$ 732.904	
Est. Fund Balance (end of Decommissioning) (in Future \$ escalated at 0.0% & 2.0% Real Rate of Return Fund Growth Rate)							\$ 782.936
Est. Fund Balance (end of Decommissioning) disc to							\$ 248.265

**Kewaunee Power Station
Decommissioning Funding Status Report as of December 31, 2014**

Table II Definitions:

- Column 1: Beginning of Year Balance:**
Reflects the beginning-of-year Trust Fund balance at a 0.0% cost escalation rate and a 2.0% Real Rate of Return (RRoR) on fund growth.
- Column 2: Earnings on Trust Funds:**
Reflects earnings on funds remaining in the trust. A 2.0% RRoR Fund growth rate is used for 2015 through 2073 which reflects the allowed 2.0% RRoR over a 0.0% cost escalation rate. The annual 2.0% RRoR earnings are calculated on the beginning balance plus 50% of the projected annual expenditure for each year.
- Column 3: Remaining License Termination Expenditures:**
Reflects the annual License Termination Plan cost portion at a 0.0% escalation rate from the Site Specific Estimate.
- Column 4: Remaining Spent Fuel Management Expenditures:**
Reflects the annual Irradiated Fuel Management Plan cost portion at a 0.0% escalation rate from the Site Specific Estimate. This column is intended to provide the report on the status of funding for managing irradiated fuel required by 10 CFR 50.82(a)(8)(vii).
- Column 5: Remaining Site Restoration Expenditures:**
Reflects the annual Site Restoration Plan cost portion at a 0.0% escalation rate from the Site Specific Estimate.
- Column 6: Remaining SAFSTOR Expenditures:**
Reflects the annual SAFSTOR Decommissioning Plan cost at a 0.0% escalation rate from the Site Specific Estimate.
- Column 7: End of Year Balance:**
Reflects the end of year Trust Fund balance after all projected earnings are added and all projected expenditures are deducted for the year specified at a 0.0% escalation rate and a 2.0% RRoR on fund growth.

Tables I and II General Notes:

- 1) The cost estimates contained in Tables I and II are obtained from revised site-specific cost and schedule tables that were provided in an update to the KPS Post-Shutdown Decommissioning Activities Report (Serial No. 14-116, ADAMS Accession No. ML 14118A382) dated April 25, 2014.
- 2) The Trust Fund Balance reflects market value on December 31, 2014, net of taxes on realized gains and losses.
- 3) The 2.0% RRoR is based on the rate allowed by 10 CFR 50.75(e)(1)(i) and 10 CFR 50.82(a)(8)(vi) and not on any order of rate setting authority.
- 4) The funding method for providing financial assurance for decommissioning KPS remains prepayment. This cash flow analysis demonstrates that the amounts accumulated in the Trust are sufficient; with credited earnings at a 2.0% RRoR, to cover the estimated cost of radiological decommissioning, spent fuel management and site restoration.
- 5) DEK has in place a parent Support Agreement in the amount of \$60 million that upon NRC approval is expected to be cancelled in the near future. By letter dated January 28, 2015 (Serial No. 15-001), DEK provided a new commitment letter from its parent and requested NRC concurrence with the cancellation of the previous Support Agreement.
- 6) The cash flow analysis in Table II shows that the funds accumulated in the Trust are sufficient, with credited earnings at a 2.0% real rate of return, to cover the estimated cost of radiological decommissioning, spent fuel management and site restoration. On May 21, 2014, the NRC granted DEK an exemption allowing the Trust to be used for spent fuel management costs.

Attachment 1

Financial Test for Year Ended December 31, 2014
Paragraph II.A.2 of Appendix A to 10 CFR Part 30

Kewaunee Power Station
Dominion Energy Kewaunee, Inc. (DEK)

G. Scott Hetzer
Senior Vice President and Treasurer

Dominion Resources, Inc.
120 Tredegar Street, Richmond, VA 23219

Mailing Address: P.O. Box 26532
Richmond, VA 23261



March, 19, 2015

Attachment 1

FINANCIAL TEST

Paragraph II. A.2 of Appendix A to 10 CFR Part 30

- A. Maximum Guarantee Amount for Facility License No. DPR-43: \$60 million
- B. Dominion Resources, Inc. issued a total of \$1,650,000,000 in unsecured senior notes, split among three tranches, on November 17, 2014 as follows: \$700M 5 year; \$500M 10 year; \$450M 30 year. Each of these issues were rated BBB+ by Standard and Poor's and Baa2 by Moody's at the time of issuance and maintain those ratings today.
- C. DRI's tangible net worth (millions of dollars):

Total Equity		\$11,957
Less:	Net Book Value of the Nuclear Facility and Site (KPS)	-
	Goodwill of the Nuclear Facility and Site (KPS)	-
(i) Total Net Worth		<u>\$11,957</u>
Less:	Goodwill	3,044
	Intangible Assets	<u>570</u>
(ii) Tangible Net Worth		<u>\$ 8.343</u>
DRI Total Assets	\$ 54,327	
Less: Foreign Assets	<u> -</u>	
Total US Assets	<u>\$ 54,327</u>	

FINANCIAL TESTS	YES	NO
1. Is line C (ii) at least \$21 Million?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is line C (i) at least 6 times the guarantee amount of \$60 million?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. a. Are at least 90 percent of the firm's assets located in the U.S.? or, b. Is line C (i) at least 6 times the guarantee amount of \$60 million?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4. a. Are bond ratings BBB (including +/- adjustments) or above as issued by Standard and Poor's or,
- b. Are bond ratings Baa (including +/- adjustments) or above as issued by Moody's

I hereby certify that the content of this Financial Test: Paragraph II.A.2 of Appendix A to 10 CFR Part 30 is true and correct to the best of my knowledge.



Senior Vice President & Treasurer,
Dominion Resources Inc.

Attachment 2

Deloitte & Touche LLP
Attesting Letter of Accuracy of the Financial Test

Kewaunee Power Station
Dominion Energy Kewaunee, Inc. (DEK)

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors and Shareholders of
Dominion Resources, Inc.
Richmond, Virginia

We have performed the procedures enumerated below regarding the data used by Dominion Resources, Inc. ("Dominion" or the "Company"), as parent company of Dominion Energy Kewaunee, Inc., licensed operator of the Kewaunee Power Station, solely to assist the U.S. Nuclear Regulatory Commission in evaluating the Company's compliance with the financial test to demonstrate financial assurance for the year ended December 31, 2014, as specified in Appendix A to Part 30 of the U.S. Nuclear Regulatory Commission's Code of Federal Regulations (the "financial test"), included as Attachment 1 to the financial assurance letter dated March 19, 2015 from Scott Hetzer, Senior Vice President Tax and Treasury of Dominion Resources, Inc. to the U.S. Nuclear Regulatory Commission (the "Financial Assurance Letter"). Dominion's management is responsible for the financial test and compliance with associated requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and related findings are as follows:

1. We compared the bond rating in Attachment 1 to the Company's Financial Assurance Letter to third-party sources, noting no differences.
2. We compared amounts identified as "Total Equity", "Goodwill", "Intangible Assets", and "DRI Total Assets" in Attachment 1 to the Company's Financial Assurance Letter to the Company's consolidated financial statements as of December 31, 2014, on which we have issued our report dated February 27, 2015, noting no differences.
3. We compared amounts identified as "Net Book Value of the Nuclear Facility and Site (KPS)", "Goodwill of the Nuclear Facility and Site (KPS), and

“Foreign Assets” in Attachment 1 of the Company’s Financial Assurance Letter to corresponding amounts in a schedule or report prepared by the Company as of December 31, 2014, noting no differences.

4. We recomputed the mathematical accuracy of the amounts identified as “Total Net Worth”, “Tangible Net Worth”, and “Total US Assets” in Attachment 1 to the Company’s Financial Assurance Letter, noting no differences.

With respect to procedures outlined in Paragraph II.B of Appendix A of 10 CFR Part 30 of the U.S. Nuclear Regulatory Commission’s 10 CFR Part 30, professional standards preclude us from providing any form of report or assurance on matters relating to solvency. Accordingly, no such form of report or assurance is provided.

We were not engaged to, and did not, perform an examination, the objective of which would be the expression of an opinion on the accompanying Financial Assurance Letter dated March 19, 2015. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the board of directors and management of the Company and Dominion Energy, Inc., and the U.S. Nuclear Regulatory Commission, and is not intended to be and should not be used by anyone other than these specified parties.

Deloitte & Touche LLP

March 27, 2015