

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

DIRECT TESTIMONY OF

BRETT L. LOVELL

**ON BEHALF OF
EVERGY METRO, INC.
EVERGY KANSAS SOUTH, INC.
AND
KANSAS ELECTRIC POWER COOPERATIVE, INC.**

**IN THE MATTER OF THE 2023
WOLF CREEK TRIENNIAL DECOMMISSIONING
FINANCING PLAN.**

DOCKET NO. 23-WCNE-___-GIE

1 **Q: Please state your name and business address.**

2 A: My name is Brett L. Lovell. My business address is 1200 Main Street. Kansas City, Mo,
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy Metro, Inc. (“EM”) and Evergy Kansas South, Inc. (“EKS”) as
6 Manager, Corporate Treasury.

7 **Q: What are your responsibilities?**

8 A: My responsibilities include cash management and corporate finance functions of Evergy
9 and its related companies.

1 **Q: Please describe your education, experience and employment history.**

2 A: I joined Evergy in January 2021 after relocating from California after a thirty-five year
3 professional career in commercial banking, commercial real estate finance, and corporate
4 treasury. Eight-plus years of corporate treasury and finance in aerospace and defense has
5 dovetailed directly into the past three years with this utility company and industry. I am a
6 graduate of California State University Sacramento with a degree in Business Finance
7 with minor in Economics.

8 **Q: Have you previously testified in a proceeding at the State Corporation Commission**
9 **for the State of Kansas (“KCC” or “Commission”) or before any other utility**
10 **regulatory agency?**

11 A: No. This is my first time providing testimony.

12 **Q: What is the purpose of your testimony?**

13 A: The purpose of my testimony is to recommend an escalation rate that would be applied to
14 the estimated cost of decommissioning the Wolf Creek Nuclear Generating Station
15 (“Wolf Creek”) stated in 2023 dollars, as projected by TLG Services, Inc. (“TLG”) of
16 Bridgewater, Connecticut in a report titled “Decommissioning Cost Analysis for the Wolf
17 Creek Generating Station” dated August, 2023. The decommissioning cost estimates
18 provided by TLG in the study are reported in the year of projected expenditure but the
19 values are provided in 2023 dollars. Costs are not inflated, escalated, or discounted over
20 the periods of performance. Therefore the annual inflation rate I am recommending
21 escalates the 2023 decommissioning cost estimate prepared by TLG to the equivalent cost
22 in the future year of expenditure. Decommissioning expenditures are assumed to begin in
23 2045, when the Wolf Creek operating license will expire.

1 **Q: On whose behalf are you presenting this testimony?**

2 A: I am presenting this testimony on behalf of the three co-owners of Wolf Creek, including
3 EM, EKS, and Kansas Electric Power Cooperative, Inc. (“KEPCo”).

4 **I. RECOMMENDED RATE OF INFLATION**

5 **Q: What is the current dollar decommissioning cost estimate for Wolf Creek and what
6 is the basis for the cost estimate?**

7 A: The current dollar decommissioning cost estimate for Wolf Creek is based on a study
8 performed by TLG dated August 2023. TLG is a recognized industry leader in nuclear
9 decommissioning cost analysis. The decommissioning cost estimate varies depending
10 upon the decommissioning alternative selected. The estimated cost for the DECON
11 alternative is \$1,171,363,000 in 2023 dollars. Plus, the cost of decommissioning the
12 Independent Spent Fuel Storage Installation of \$11,834,000. The TLG study is included
13 as part of the Wolf Creek Decommissioning Finance Plan filed in compliance with the
14 Commission’s Order in Docket No. 15-WCNE-093-GIE.

15 **Q: What is the assumed timing of the future decommissioning costs?**

16 A: Wolf Creek’s operating license expires on March 11, 2045. The 2023 TLG Wolf Creek
17 decommissioning study includes schedules of decommissioning costs beginning in 2045
18 and continuing through 2079 for the DECON alternative.

19 **Q: What is the decommissioning cost escalation rate that you are recommending?**

20 A: I am recommending a separate escalation rate be applied to each of the five main cost
21 elements that comprise TLG’s cost estimate: (i) labor cost, (ii) equipment & material
22 cost, (iii) energy cost, (iv) burial cost, and (v) other cost. The specific escalation rates
23 are: (i) 3.2% for labor cost, (ii) 2.0% for equipment & material cost, (iii) 2.8% for the

1 electricity component of energy costs and 1.7% for the fuel cost component, (iv) 5.15%
2 for burial cost, and (v) 2.5% for other costs.

3 **Q: Does this methodology for determining an escalation rate for Wolf Creek**
4 **decommissioning costs differ from the methodology proposed in the Wolf Creek**
5 **Decommissioning Cost Study case in 2020?**

6 A: No.

7 **Q: What was the basis for your recommended cost escalation rate for each cost element**
8 **identified by TLG in their decommissioning study?**

9 A: There are no indices that specifically measure inflation in nuclear decommissioning costs.
10 I developed an estimate for each component of the plant decommissioning cost (except
11 nuclear waste burial costs) utilizing long range forecasts for various indices published by
12 Moody's Analytics. Moody's Analytics is a well-known and respected source of
13 economic forecasts, and its website at www.economy.com contains projections through
14 2050 for the indices used in my calculation. For Labor Cost, I used the Employment Cost
15 Index ("ECI") for Total Compensation-All Civilian and All Workers. For the electricity
16 component of the Energy Cost, I used the Producer Price Index ("PPI") for Electric
17 Power-Total. For the fuel oil component of the Energy Cost, I used the PPI for No. 2
18 Fuel Oil. For the Equipment & Materials Cost, I used the PPI for All Commodities. For
19 the Other Cost, I used the Consumer Price Index ("CPI")-All Commodities.

20 **Q: How did you estimate the burial cost escalation rate?**

21 A: The Moody's Analytics forecast does not include a projection of burial costs. However,
22 the NRC, in their periodically revised *NUREG-1307* report, provides escalation factors
23 for the waste burial/disposition cost element. *NUREG-1307* contains indices for

1 historical burial costs at the Washington and South Carolina low-level waste storage
2 sites. While neither of these storage sites currently accept low-level waste from
3 generators that are not located in the Northwest, Rocky Mountain, Atlantic or Texas
4 Compact states, I used the historical burial cost indices for these sites as a reasonable
5 proxy for the burial cost escalation rate for Wolf Creek's low-level waste to be deposited
6 at a still to-be-determined storage site.

7 **Q: Please describe the results of your analysis for the cost escalation formula.**

8 A: For all of the cost components except burial cost, I calculated the compound annual
9 growth of the Moody's Analytics projections for years 2023 through 2044 as shown in
10 attached Schedule BLL-1 and used these figures as the escalation rate for each of the
11 individual components of the estimated decommissioning cost.. For the burial
12 component, I calculated the geometric means for years 1995 through 2022
13 (PWR/Compact/Direct Disposal) for the Washington and South Carolina sites,
14 respectively, as shown in attached Schedule BLL-2 and averaged the geometric means
15 for the two sites. The results for the various components of the formula are:

16	Labor Cost	3.2%
17	Equipment & Material Cost	2.0%
18	Energy Cost:	
19	Electricity	2.8%
20	Fuel Oil	1.7%
21	Burial Cost	5.15%
22	Other Costs	2.5%

1 Q: Does that conclude your testimony?

2 A: Yes.

Source:	Moody's Analytics (www.economy.com) <i>(see Al Bass for information - he has a subscription)</i>				
Mnemonic:	FXPPIFU7302.IUSA	FXPPIFU4.IUSA	FECICCCQ.IUSA	FCPIU.IUSA	FXPPI000000.IUSA
Description:	Baseline Scenario (June 2023): PPI: No. 2 Fuel Oil, (Index 1982=100, NSA)	Baseline Scenario (June 2023): PPI: Electric Power - Total, (Index 1982=100, NSA)	Baseline Scenario (June 2023): ECI: Total Compensation - All Civilian - All Workers, (Index Dec2005=100, SA)	Baseline Scenario (June 2023): CPI: Urban Consumer - All Items, (Index 1982-84=100, SA)	Baseline Scenario (June 2023): PPI: All Commodities, (Index 1982=100, NSA)
Source:	U.S. Bureau of Labor Statistics (BLS); Moody's Analytics Forecasted	U.S. Bureau of Labor Statistics (BLS); Moody's Analytics Forecasted	U.S. Bureau of Labor Statistics (BLS); Moody's Analytics Forecasted	U.S. Bureau of Labor Statistics (BLS); Moody's Analytics Forecasted	U.S. Bureau of Labor Statistics (BLS); Moody's Analytics Forecasted
Native Frequency:	QUARTERLY	QUARTERLY	QUARTERLY	QUARTERLY	QUARTERLY
Geography:	United States	United States	United States	United States	United States
Begin Date:	03/31/1975	03/31/1958	03/31/1982	03/31/1947	03/31/1913
Last Updated:	06/05/2023	06/05/2023	06/05/2023	06/05/2023	06/05/2023
Historical End Date:	03/31/23	03/31/23	03/31/23	03/31/23	03/31/23

2023Q1	284.70	261.48	157.40	301.33	258.62
2023Q2	240.46	260.41	158.90	303.19	255.97
2023Q3	240.48	271.76	160.36	305.21	257.19
2023Q4	261.03	260.62	161.73	307.65	260.10
2024Q1	262.40	261.29	163.04	309.72	262.20
2024Q2	260.88	267.75	164.31	311.57	262.86
2024Q3	249.26	278.36	165.54	313.25	263.32
2024Q4	242.59	267.30	166.71	314.83	263.59
2025Q1	228.39	268.63	167.88	316.39	263.62
2025Q2	224.42	275.39	169.04	318.01	263.56
2025Q3	213.72	285.70	170.19	319.59	263.75
2025Q4	212.94	273.54	171.34	321.12	264.42
2026Q1	206.36	274.34	172.49	322.72	265.15
2026Q2	209.90	281.03	173.66	324.33	265.94
2026Q3	206.36	291.62	174.83	325.96	266.87
2026Q4	212.30	279.47	176.01	327.57	268.41
2027Q1	209.86	280.66	177.20	329.20	269.65
2027Q2	215.12	287.91	178.39	330.80	270.64
2027Q3	211.69	299.12	179.60	332.44	271.62
2027Q4	218.12	286.90	180.81	334.13	273.18
2028Q1	215.23	288.27	182.03	335.86	274.49
2028Q2	221.59	295.79	183.27	337.62	275.66
2028Q3	218.54	307.38	184.51	339.40	276.82
2028Q4	224.69	294.87	185.76	341.19	278.41
2029Q1	221.01	296.35	187.03	343.00	279.66
2029Q2	226.69	304.13	188.29	344.81	280.73
2029Q3	223.01	316.03	189.57	346.62	281.80
2029Q4	229.13	303.11	190.86	348.46	283.40
2030Q1	225.56	304.52	192.16	350.32	284.72
2030Q2	231.72	312.39	193.47	352.19	285.88
2030Q3	228.19	324.49	194.79	354.08	287.06
2030Q4	234.44	311.13	196.13	355.96	288.68
2031Q1	230.47	312.51	197.47	357.86	289.98
2031Q2	236.30	320.54	198.84	359.76	291.09
2031Q3	232.34	332.92	200.21	361.67	292.21
2031Q4	238.54	319.15	201.60	363.57	293.84
2032Q1	234.61	320.52	203.01	365.48	295.19
2032Q2	240.84	328.74	204.42	367.41	296.36
2032Q3	237.05	341.45	205.85	369.36	297.56
2032Q4	243.48	327.30	207.31	371.34	299.27
2033Q1	239.51	328.72	208.77	373.32	300.67
2033Q2	245.78	337.20	210.26	375.33	301.89
2033Q3	241.95	350.31	211.75	377.36	303.15
2033Q4	248.86	335.82	213.27	379.42	304.94
2034Q1	245.28	337.36	214.79	381.51	306.47
2034Q2	252.37	346.15	216.34	383.64	307.84
2034Q3	248.93	359.71	217.90	385.80	309.23
2034Q4	256.19	344.87	219.47	387.98	311.11
2035Q1	252.40	346.51	221.07	390.17	312.69
2035Q2	259.33	355.60	222.68	392.40	314.06
2035Q3	255.54	369.60	224.32	394.65	315.44
2035Q4	262.84	354.32	225.97	396.92	317.33
2036Q1	258.94	356.01	227.65	399.21	318.93
2036Q2	266.17	365.37	229.34	401.52	320.34
2036Q3	262.47	379.78	231.05	403.85	321.81
2036Q4	270.31	364.03	232.78	406.20	323.82

2038Q1	276.31	375.93	241.66	418.32	332.60
2038Q2	284.59	385.90	243.48	420.80	334.20
2038Q3	281.18	401.23	245.32	423.30	335.83
2038Q4	290.06	384.57	247.18	425.83	337.99
2039Q1	286.72	386.46	249.05	428.39	339.88
2039Q2	295.71	396.75	250.94	430.98	341.59
2039Q3	292.44	412.58	252.84	433.60	343.36
2039Q4	301.99	395.48	254.76	436.25	345.62
2040Q1	298.67	397.51	256.70	438.93	347.60
2040Q2	308.20	408.19	258.64	441.62	349.39
2040Q3	305.07	424.57	260.61	444.33	351.23
2040Q4	315.40	407.01	262.59	447.05	353.60
2041Q1	312.45	409.14	264.59	449.81	355.68
2041Q2	323.08	420.18	266.61	452.59	357.59
2041Q3	320.34	437.10	268.64	455.40	359.55
2041Q4	331.60	419.04	270.68	458.22	362.01
2042Q1	328.84	421.27	272.75	461.05	364.17
2042Q2	340.26	432.70	274.82	463.92	366.16
2042Q3	337.62	450.19	276.92	466.81	368.21
2042Q4	349.71	431.59	279.04	469.71	370.73
2043Q1	346.78	433.92	281.18	472.64	372.91
2043Q2	358.78	445.74	283.34	475.59	374.89
2043Q3	355.84	463.79	285.52	478.56	376.90
2043Q4	368.34	444.61	287.72	481.56	379.35
2044Q1	365.06	447.00	289.94	484.58	381.50
2044Q2	377.49	459.17	292.18	487.61	383.49
2044Q3	373.95	477.77	294.44	490.66	385.46
2044Q4	386.67	457.97	296.72	493.73	387.84

2023-2044

1.7%	2.8%	3.2%	2.5%	2.0%
PPI: No. 2 Fuel Oil	PPI: Electric Power - Total	ECI: Total Compensation - All Civilian - All Workers	CPI: Urban Consumer - All Items	PPI: All Commodities

Year	Bx Values for Washington Site (U.S. Ecology)				Bx Values for South Carolina Site (Barnwell)				Bx Values for Generators Located in the Unaffiliated States and those Located in Compact Affiliated States having no Disposal Facility				
	Compact Affiliated Disposal Facility Only		Combination of Compact Affiliated and Non-Compact Disposal Facilities		Atlantic Compact		Combination of Compact Affiliated and Non-Compact Disposal Facilities						
	PWR	BWR	PWR	BWR	PWR	BWR	PWR	BWR	PWR	BWR	PWR	BWR	
2022	10.013				38.742					13.711			
2020	11.019				32.973					12.793			
2018	10.854				32.329					12.853			
2016	8.706				30.061					12.471			
2012	7.335				30.581								
2010	8.035				27.292								
2008	8.283				25.231								
2006	6.829				22.933								
2004	5.374				19.500								
2002	3.634				17.922								
2000	2.223				17.922								
1998	3.165				15.886								
1997	3.112				15.852								
1996	2.845				12.771								
1995	2.015				12.824								

Geometric Means

From	To	Geometric Mean				Geometric Mean				Geometric Mean				Average of Geometric Means
2020	2022	-4.7%				8.4%				3.5%				2.4%
2018	2022	-2.0%				4.6%				1.6%				1.4%
2016	2022	2.4%				4.3%				1.6%				2.8%
2012	2022	3.2%				2.4%								2.8%
2008	2022	1.4%				3.1%								2.2%
2006	2022	2.4%				3.3%								2.9%
2004	2022	3.5%				3.9%								3.7%
2002	2022	5.2%				3.9%								4.6%
2000	2022	7.1%				3.6%								5.3%
1998	2022	4.9%				3.8%								4.4%
1997	2022	4.8%				3.6%								4.2%
1996	2022	5.0%				4.4%								4.7%
1995	2022	6.1%				4.2%								5.1%

Sources

- NRC, NUREG-1307, Revision 11, June 2005
- NRC, NUREG-1307, Revision 14, November 2010
- NRC, NUREG-1307, Revision 15, January 2013
- NRC, NUREG-1307, Revision 16, March 2017
- NRC, NUREG-1307, Revision 17, February 2019

Estimated Cost at Decommissioning (Eversys Kansas South Response)

In support of K.S.A. 66-128m (b)(6):

1. The amount of money which customers of each owner have been charged for decommissioning up to the date of submission of the plan; and
2. The total amount necessary to meet the projected decommissioning costs of the facility, over the remaining useful life of the facility.

Response

1. The amount of money which customers have been charged for decommissioning up to this time is assumed to equal the amount contributed by Eversys Kansas South to the Wolf Creek Nuclear Decommissioning Trust (NDT). The attached **Schedule A** shows the timing and the amounts contributed to the NDT since inception. To date, Eversys Kansas South has contributed \$131.1 million; of which \$126.9 million is Kansas-jurisdictional and \$4.2 million is FERC-jurisdictional.
2. Based on the Decommissioning Cost Analysis for the Wolf Creek Generating Station prepared by TLG Services, Inc. in August 2023, the estimated cost to decommission the Wolf Creek nuclear unit assuming the DECON alternative, is \$1,171,364,000 in 2023 dollars plus the cost to decommission the ISFSI of \$11,835,000 in 2023 dollars.

Based on a proposed annual escalation rate of 3.07%, the total amount necessary to decommission the facility is estimated to be \$3,150,250,377. Eversys Kansas South's 47% share of these costs equals \$1,480,617,677.

¹ Docket No. 163,561-U is also referred to by its more modern classification, Docket No. 89-WCNE-140-GIE.

Evergy Kansas South, Inc. (f/k/a Kansas Gas and Electric Co.) Wolf Creek Generating Station
 NDT Quarterly Contributions

<u>Contribution Date</u>	<u>Contribution Year</u>	<u>Contribution Quarter</u>	<u>Contribution Amount</u>	<u>Annual Contribution based on Calendar Year</u>	<u>Annual Contribution based on Contribution Yr</u>
07/31/86	1986	Q2	\$635,256.00		
11/07/86	1986	Q3	211,752.00	\$847,008.00	
01/28/87	1986	Q4	230,865.00		\$1,077,873.00
04/27/87	1987	Q1	230,865.00		
07/24/87	1987	Q2	234,865.00		
10/28/87	1987	Q3	146,480.00	843,075.00	
03/08/88	1987	Q4	202,487.75		814,697.75
04/28/88	1988	Q1	206,863.00		
07/25/88	1988	Q2	206,862.00		
10/24/88	1988	Q3	206,863.00	823,075.75	
01/23/89	1988	Q4	206,862.00		827,450.00
04/24/89	1989	Q1	206,863.00		
07/26/89	1989	Q2	206,862.00		
10/23/89	1989	Q3	206,863.00	827,450.00	
01/31/90	1989	Q4	206,863.00		827,451.00
04/24/90	1990	Q1	206,863.00		
07/24/90	1990	Q2	206,863.00		
10/26/90	1990	Q3	206,863.00	827,452.00	
01/24/91	1990	Q4	206,863.00		827,452.00
04/22/91	1991	Q1	206,863.00		
07/23/91	1991	Q2	206,862.00		
10/21/91	1991	Q3	206,863.00	827,451.00	
01/23/92	1991	Q4	206,863.00		827,451.00
04/28/92	1992	Q1	815,750.00		
07/23/92	1992	Q2	815,750.00		
10/29/92	1992	Q3	815,750.00	2,654,113.00	
01/20/93	1992	Q4	767,330.00		3,214,580.00
04/16/93	1993	Q1	867,547.50		
07/14/93	1993	Q2	867,547.50		
10/12/93	1993	Q3	867,547.50	3,369,972.50	
01/19/94	1993	Q4	867,547.50		3,470,190.00
04/01/94	1994	Q1	883,523.25		
07/01/94	1994	Q2	883,523.25		
10/01/94	1994	Q3	883,523.25	3,518,117.25	
01/01/95	1994	Q4	883,523.25		3,534,093.00
04/01/95	1995	Q1	899,498.75		
07/01/95	1995	Q2	899,498.75		
10/01/95	1995	Q3	899,498.75	3,582,019.50	
01/01/96	1995	Q4	899,498.75		3,597,995.00
04/01/96	1996	Q1	915,474.50		
07/01/96	1996	Q2	915,474.50		
10/01/96	1996	Q3	915,474.50	3,645,922.25	
01/01/97	1996	Q4	915,474.50		3,661,898.00
04/01/97	1997	Q1	931,450.00		
07/01/97	1997	Q2	931,450.00		
10/06/97	1997	Q3	931,450.00	3,709,824.50	
01/05/98	1997	Q4	931,450.00		3,725,800.00
04/01/98	1998	Q1	947,425.75		
07/01/98	1998	Q2	947,425.75		
10/01/98	1998	Q3	981,241.00	3,807,542.50	

01/04/99	1998	Q4	958,697.50		3,834,790.00
04/01/99	1999	Q1	974,864.25		
07/01/99	1999	Q2	974,864.25		
10/01/99	1999	Q3	974,864.25	3,883,290.25	
01/03/00	1999	Q4	974,864.25		3,899,457.00
04/08/00	2000	Q1	991,031.00		
07/05/00	2000	Q2	991,031.00		
10/02/00	2000	Q3	991,031.00	3,947,957.25	
01/02/01	2000	Q4	991,031.00		3,964,124.00
04/02/01	2001	Q1	1,007,197.75		
07/02/01	2001	Q2	1,007,197.75		
10/01/01	2001	Q3	1,007,197.75	4,012,624.25	
01/02/02	2001	Q4	1,007,197.75		4,028,791.00
04/01/02	2002	Q1	1,018,502.00		
07/01/02	2002	Q2	1,018,502.00		
10/01/02	2002	Q3	961,419.00	4,005,620.75	
01/02/03	2002	Q4	847,253.00		3,845,676.00
04/01/03	2003	Q1	961,419.00		
07/01/03	2003	Q2	961,419.00		
10/01/03	2003	Q3	961,419.00	3,731,510.00	
01/02/04	2003	Q4	961,419.00		3,845,676.00
04/01/04	2004	Q1	961,419.00		
07/01/04	2004	Q2	961,419.00		
10/01/04	2004	Q3	961,419.00	3,845,676.00	
01/03/05	2004	Q4	980,413.00		3,864,670.00
04/01/05	2005	Q1	966,167.50		
07/01/05	2005	Q2	966,167.50		
10/03/05	2005	Q3	966,167.50	3,878,915.50	
01/03/06	2005	Q4	966,167.50		3,864,670.00
04/03/06	2006	Q1	966,167.50		
07/03/06	2006	Q2	966,167.50		
10/02/06	2006	Q3	966,167.50	3,864,670.00	
01/02/07	2006	Q4	966,167.50		3,864,670.00
04/02/07	2007	Q1	723,658.75		
07/02/07	2007	Q2	723,658.75		
10/01/07	2007	Q3	723,658.75	3,137,143.75	
01/02/08	2007	Q4	723,658.75		2,894,635.00
04/01/08	2008	Q1	723,658.75		
07/01/08	2008	Q2	723,658.75		
09/01/08	2008	Q2	723,658.75	2,894,635.00	
01/02/09	2008	Q4	723,658.75		2,894,635.00
04/01/09	2009	Q1	723,658.75		
07/01/09	2009	Q2	723,658.75		
10/01/09	2009	Q3	723,658.75	2,894,635.00	
01/04/10	2009	Q4	723,658.75		2,894,635.00
04/01/10	2010	Q1	787,517.50		
07/01/10	2010	Q2	787,517.50		
10/01/10	2010	Q3	787,517.50	3,086,211.25	
01/04/11	2010	Q4	787,517.50		3,150,070.00
04/01/11	2011	Q1	787,517.50		
07/01/11	2011	Q2	787,517.50		
10/03/11	2011	Q3	787,517.50	3,150,070.00	
01/03/12	2011	Q4	787,517.50		3,150,070.00
04/02/12	2012	Q1	787,517.50		
07/02/12	2012	Q2	787,517.50		
10/01/12	2012	Q3	787,517.50	3,150,070.00	
01/02/13	2012	Q4	787,517.50		3,150,070.00
04/01/13	2013	Q1	690,620.75		

Schedule B

Evergy Kansas South 2023 Funding Analysis

DECOMMISSIONING COST ASSUMPTIONS	
2023 Decom Cost Est	\$ 1,183,198,487
Cost Escalation Rate	3.07%
EKS Share	47.00%
Future Juris Allocation Factor	100.00%
Wtd Historical/Future Alloc Factor	100.00%

Year	2023 Wolf Creek Decom Cost	Escalated Wolf Creek Decom Cost	EKS Kansas Decom Cost
2023	\$ -	\$ -	\$ -
2024	\$ -	\$ -	\$ -
2025	\$ -	\$ -	\$ -
2026	\$ -	\$ -	\$ -
2027	\$ -	\$ -	\$ -
2028	\$ -	\$ -	\$ -
2029	\$ -	\$ -	\$ -
2030	\$ -	\$ -	\$ -
2031	\$ -	\$ -	\$ -
2032	\$ -	\$ -	\$ -
2033	\$ -	\$ -	\$ -
2034	\$ -	\$ -	\$ -
2035	\$ -	\$ -	\$ -
2036	\$ -	\$ -	\$ -
2037	\$ -	\$ -	\$ -
2038	\$ -	\$ -	\$ -
2039	\$ -	\$ -	\$ -
2040	\$ -	\$ -	\$ -
2041	\$ -	\$ -	\$ -
2042	\$ -	\$ -	\$ -
2043	\$ -	\$ -	\$ -
2044	\$ -	\$ -	\$ -
2045	\$ 78,763,511	\$ 152,695,980	\$ 71,767,111
2046	\$ 167,311,059	\$ 340,805,941	\$ 160,178,792
2047	\$ 195,793,622	\$ 439,742,362	\$ 206,678,910
2048	\$ 214,553,540	\$ 478,672,799	\$ 224,976,216
2049	\$ 96,789,401	\$ 229,033,682	\$ 107,645,830
2050	\$ 53,355,651	\$ 118,291,924	\$ 55,597,204
2051	\$ 48,724,496	\$ 105,688,864	\$ 49,673,766
2052	\$ 15,376,748	\$ 35,043,045	\$ 16,470,231
2053	\$ 10,231,654	\$ 24,457,804	\$ 11,495,168
2054	\$ 10,231,654	\$ 25,183,531	\$ 11,836,260
2055	\$ 10,499,029	\$ 26,492,163	\$ 12,451,317
2056	\$ 10,258,221	\$ 26,771,188	\$ 12,582,458
2057	\$ 10,231,654	\$ 27,494,456	\$ 12,922,394
2058	\$ 10,499,029	\$ 28,913,976	\$ 13,589,569
2059	\$ 10,231,654	\$ 29,153,440	\$ 13,702,117
2060	\$ 10,258,221	\$ 30,099,417	\$ 14,146,726
2061	\$ 10,499,029	\$ 31,560,815	\$ 14,833,583
2062	\$ 10,231,654	\$ 31,834,274	\$ 14,962,109
2063	\$ 10,231,654	\$ 32,782,351	\$ 15,407,705
2064	\$ 10,525,596	\$ 34,542,553	\$ 16,235,000
2065	\$ 10,231,654	\$ 34,765,253	\$ 16,339,669
2066	\$ 10,231,654	\$ 35,801,854	\$ 16,826,872
2067	\$ 10,499,029	\$ 37,616,346	\$ 17,679,683
2068	\$ 10,258,221	\$ 38,069,840	\$ 17,892,825
2069	\$ 10,499,029	\$ 39,886,798	\$ 18,746,795
2070	\$ 10,231,654	\$ 40,271,277	\$ 18,927,500
2071	\$ 10,231,654	\$ 41,474,401	\$ 19,492,969
2072	\$ 10,525,596	\$ 43,668,394	\$ 20,524,145
2073	\$ 10,231,654	\$ 43,991,030	\$ 20,675,784
2074	\$ 10,231,654	\$ 45,306,799	\$ 21,294,196
2075	\$ 10,499,029	\$ 47,567,871	\$ 22,356,899
2076	\$ 10,258,221	\$ 48,185,757	\$ 22,647,306
2077	\$ 10,231,654	\$ 49,498,254	\$ 23,264,179
2078	\$ 28,016,192	\$ 118,874,316	\$ 55,870,928
2079	\$ 26,424,512	\$ 236,011,623	\$ 110,925,463
	\$ 1,183,198,487	\$ 3,150,250,377	\$ 1,480,617,677
EKS %	47.0%	47.0%	
EKS Share	\$ 556,103,289	\$ 1,480,617,677	
KS Jurisdictional Share --->		\$ 1,480,617,677	

Estimated Cost at Decommissioning (Evergy Kansas Metro Response)

In support of K.S.A. 66-128m (b)(6):

1. The amount of money which customers of each owner have been charged for decommissioning up to the date of submission of the plan; and
2. The total amount necessary to meet the projected decommissioning costs of the facility, over the remaining useful life of the facility.

Response

1. The amount of money which customers have been charged for decommissioning up to this time is assumed to equal the amount contributed by Evergy Kansas Metro to the Wolf Creek Nuclear Decommissioning Trust (NDT). The attached **Schedule A** shows the timing and the amounts contributed to the NDT since inception. To date, Evergy Kansas Metro has contributed \$113.4 million, \$53.5 million of which is Kansas-jurisdictional and \$59.9 million is Missouri-jurisdictional.
2. Based on the Decommissioning Cost Analysis for the Wolf Creek Generating Station prepared by TLG Services, Inc. in August 2023, the estimated cost to decommission the Wolf Creek nuclear unit assuming the DECON alternative, is \$1,171,364,000 in 2023 dollars plus the cost to decommission the ISFSI of \$11,835,000 in 2023 dollars.

Based on a proposed annual escalation rate of 3.07%, the total amount necessary to decommission the facility is estimated to be \$3,150,250,377. Evergy Metro Inc.'s 47% share of these costs equals \$1,480,617,677, of which Evergy Kansas Metro's jurisdictional share is \$664,561,050.

DECOMMISSIONING COST ASSUMPTIONS

Decommissioning Cost Estimate in 2023 Dollars: $\$1,171,364,000 + 11,835,000 = 1,183,198,000$
Cost Escalation Rate: 3.07%; Evergy Metro Share: 47.00%; Weighted Allocation Factor: 44.88%

Schedule A

Evergy Metro, Inc. (f/k/a Kansas City Power & Light Company) Wolf Creek Nuclear Decommissioning Trust Contributions

Contribution Date	Contribution Year	Contribution Quarter	Missouri Jurisdictional Amount	Kansas Jurisdictional Amount	Total Contribution Amount
8/15/1986	1986	Q2	\$ 125,198.93	\$ 190,106.50	\$ 315,305.43
10/15/1986	1986	Q3	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
1/15/1987	1986	Q4	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
4/15/1987	1987	Q1	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
7/15/1987	1987	Q2	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
10/15/1987	1987	Q3	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
1/15/1988	1987	Q4	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
4/15/1988	1988	Q1	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
7/15/1988	1988	Q2	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
10/15/1988	1988	Q3	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
1/15/1989	1988	Q4	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
4/15/1989	1989	Q1	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
7/15/1989	1989	Q2	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
10/15/1989	1989	Q3	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
1/15/1990	1989	Q4	\$ 200,750.01	\$ 63,135.00	\$ 263,885.01
4/15/1990	1990	Q1	\$ 200,750.01	\$ 112,305.00	\$ 313,055.01
7/15/1990	1990	Q2	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
10/15/1990	1990	Q3	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
1/15/1991	1990	Q4	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
4/15/1991	1991	Q1	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
7/15/1991	1991	Q2	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
10/15/1991	1991	Q3	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
1/15/1992	1991	Q4	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
4/15/1992	1992	Q1	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
7/15/1992	1992	Q2	\$ 200,750.01	\$ 210,645.00	\$ 411,395.01
10/15/1992	1992	Q3	\$ 951,177.99	\$ 210,645.00	\$ 1,161,822.99
1/15/1993	1992	Q4	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
4/15/1993	1993	Q1	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
7/15/1993	1993	Q2	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
10/15/1993	1993	Q3	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
1/15/1994	1993	Q4	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
4/15/1994	1994	Q1	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
7/15/1994	1994	Q2	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
10/15/1994	1994	Q3	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
1/15/1995	1994	Q4	\$ 575,964.00	\$ 210,645.00	\$ 786,609.00
3/15/1995	1995	Q1	\$ -	\$ 52,420.00	\$ 52,420.00
4/15/1995	1995	Q1	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
7/15/1995	1995	Q2	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
10/15/1995	1995	Q3	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
1/15/1996	1995	Q4	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
4/15/1996	1996	Q1	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
7/15/1996	1996	Q2	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
9/15/1996	1996	Q2	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
1/15/1997	1996	Q4	\$ 575,964.00	\$ 223,750.00	\$ 799,714.00
4/15/1997	1997	Q1	\$ 575,964.00	\$ 250,022.25	\$ 825,986.25
7/15/1997	1997	Q2	\$ 575,964.00	\$ 250,022.25	\$ 825,986.25
10/15/1997	1997	Q3	\$ 575,964.00	\$ 250,022.25	\$ 825,986.25
1/15/1998	1997	Q4	\$ 575,964.00	\$ 250,022.25	\$ 825,986.25
4/15/1998	1998	Q1	\$ 575,964.00	\$ 250,022.25	\$ 825,986.25
7/15/1998	1998	Q2	\$ 575,964.00	\$ 250,022.25	\$ 825,986.25

Schedule A

10/15/1998	1998	Q3	\$	575,964.00	\$	250,022.25	\$	825,986.25
1/15/1999	1998	Q4	\$	575,964.00	\$	250,022.25	\$	825,986.25
4/15/1999	1999	Q1	\$	575,964.00	\$	250,022.25	\$	825,986.25
7/15/1999	1999	Q2	\$	575,964.00	\$	250,022.25	\$	825,986.25
10/15/1999	1999	Q3	\$	575,964.00	\$	250,022.25	\$	825,986.25
1/15/2000	1999	Q4	\$	575,964.00	\$	250,022.25	\$	825,986.25
4/15/2000	2000	Q1	\$	575,964.00	\$	279,379.00	\$	855,343.00
7/15/2000	2000	Q2	\$	575,964.00	\$	279,379.00	\$	855,343.00
10/15/2000	2000	Q3	\$	575,964.00	\$	279,379.00	\$	855,343.00
1/15/2001	2000	Q4	\$	575,964.00	\$	279,379.00	\$	855,343.00
4/15/2001	2001	Q1	\$	575,964.00	\$	279,379.00	\$	855,343.00
7/15/2001	2001	Q2	\$	575,964.00	\$	279,379.00	\$	855,343.00
10/15/2001	2001	Q3	\$	575,964.00	\$	279,379.00	\$	855,343.00
1/15/2002	2001	Q4	\$	575,964.00	\$	279,379.00	\$	855,343.00
4/15/2002	2002	Q1	\$	575,964.00	\$	279,379.00	\$	855,343.00
7/15/2002	2002	Q2	\$	575,964.00	\$	279,379.00	\$	855,343.00
10/15/2002	2002	Q3	\$	575,964.00	\$	279,379.00	\$	855,343.00
1/15/2003	2002	Q4	\$	575,964.00	\$	279,379.00	\$	855,343.00
4/15/2003	2003	Q1	\$	575,964.00	\$	312,183.00	\$	888,147.00
7/15/2003	2003	Q2	\$	575,964.00	\$	312,183.00	\$	888,147.00
10/15/2003	2003	Q3	\$	575,964.00	\$	312,183.00	\$	888,147.00
1/15/2004	2003	Q4	\$	575,964.00	\$	312,183.00	\$	888,147.00
4/15/2004	2004	Q1	\$	575,964.00	\$	312,183.00	\$	888,147.00
7/15/2004	2004	Q2	\$	575,964.00	\$	312,183.00	\$	888,147.00
10/15/2004	2004	Q3	\$	575,964.00	\$	312,183.00	\$	888,147.00
1/15/2005	2004	Q4	\$	575,964.00	\$	312,183.00	\$	888,147.00
4/15/2005	2005	Q1	\$	575,964.00	\$	312,183.00	\$	888,147.00
7/15/2005	2005	Q2	\$	575,964.00	\$	312,183.00	\$	888,147.00
10/15/2005	2005	Q3	\$	575,964.00	\$	312,183.00	\$	888,147.00
1/15/2006	2005	Q4	\$	575,964.00	\$	312,183.00	\$	888,147.00
4/15/2006	2006	Q1	\$	575,964.00	\$	348,838.75	\$	924,802.75
7/15/2006	2006	Q2	\$	575,964.00	\$	348,838.75	\$	924,802.75
10/15/2006	2006	Q3	\$	575,964.00	\$	348,838.75	\$	924,802.75
1/15/2007	2006	Q4	\$	575,964.00	\$	348,838.75	\$	924,802.75
4/15/2007	2007	Q1	\$	320,316.00	\$	598,115.00	\$	918,431.00
7/15/2007	2007	Q2	\$	320,316.00	\$	598,115.00	\$	918,431.00
10/15/2007	2007	Q3	\$	320,316.00	\$	598,115.00	\$	918,431.00
1/15/2008	2007	Q4	\$	320,316.00	\$	598,115.00	\$	918,431.00
4/15/2008	2008	Q1	\$	320,316.00	\$	598,115.00	\$	918,431.00
7/15/2008	2008	Q2	\$	320,316.00	\$	598,115.00	\$	918,431.00
10/15/2008	2008	Q3	\$	320,316.00	\$	598,115.00	\$	918,431.00
1/15/2009	2008	Q4	\$	320,316.00	\$	598,115.00	\$	918,431.00
4/15/2009	2009	Q1	\$	320,316.00	\$	598,115.00	\$	918,431.00
7/15/2009	2009	Q2	\$	320,316.00	\$	598,115.00	\$	918,431.00
10/15/2009	2009	Q3	\$	320,316.00	\$	598,115.00	\$	918,431.00
1/15/2010	2009	Q4	\$	320,316.00	\$	598,115.00	\$	918,431.00
4/15/2010	2010	Q1	\$	320,316.00	\$	598,115.00	\$	918,431.00
7/15/2010	2010	Q2	\$	320,316.00	\$	598,115.00	\$	918,431.00
11/15/2010	2010	Q3	\$	320,316.00	\$	598,115.00	\$	918,431.00
1/15/2011	2010	Q4	\$	320,316.00	\$	568,430.00	\$	888,746.00
4/15/2011	2011	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50
7/15/2011	2011	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50
10/15/2011	2011	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50
1/15/2012	2011	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50
4/15/2012	2012	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50
7/15/2012	2012	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50
10/15/2012	2012	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50
1/15/2013	2012	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50

Schedule A

4/15/2013	2013	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2013	2013	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2013	2013	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2014	2013	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/15/2014	2014	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2014	2014	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2014	2014	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2015	2014	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/15/2015	2015	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2015	2015	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2015	2015	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2016	2015	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/15/2016	2016	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2016	2016	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2016	2016	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2017	2016	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/15/2017	2017	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2017	2017	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2017	2017	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2018	2017	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/15/2018	2018	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2018	2018	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2018	2018	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2019	2018	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/15/2019	2019	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2019	2019	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2019	2019	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2020	2019	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/15/2020	2020	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/15/2020	2020	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/16/2020	2020	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/15/2021	2020	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/16/2021	2021	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/16/2021	2021	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/15/2021	2021	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/21/2022	2021	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/14/2022	2022	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/14/2022	2022	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
10/21/2022	2022	Q3	\$	320,316.00	\$	509,057.50	\$	829,373.50	
1/19/2023	2022	Q4	\$	320,316.00	\$	509,057.50	\$	829,373.50	
4/20/2023	2023	Q1	\$	320,316.00	\$	509,057.50	\$	829,373.50	
7/20/2023	2023	Q2	\$	320,316.00	\$	509,057.50	\$	829,373.50	
12/31/2022				(197,076,272)		(141,056,132)		(338,132,404)	
Total Contributions				\$	59,865,181.16	\$	53,518,372.50	\$	113,383,553.66

Schedule B

2023 Evergy Kansas Metro Funding Analysis

DECOMMISSIONING COST ASSUMPTIONS	
2023 Decom Cost Est	\$ 1,183,198,487
Cost Escalation Rate	3.07%
Metro Share	47.00%
Future Juris Allocation Factor	46.75%
Wtd Historical/Future Alloc Factor	44.88%

Year	2023 Wolf Creek Decom Cost	Escalated Wolf Creek Decom Cost	Metro Kansas Decom Cost
2023	\$ -	\$ -	\$ -
2024	\$ -	\$ -	\$ -
2025	\$ -	\$ -	\$ -
2026	\$ -	\$ -	\$ -
2027	\$ -	\$ -	\$ -
2028	\$ -	\$ -	\$ -
2029	\$ -	\$ -	\$ -
2030	\$ -	\$ -	\$ -
2031	\$ -	\$ -	\$ -
2032	\$ -	\$ -	\$ -
2033	\$ -	\$ -	\$ -
2034	\$ -	\$ -	\$ -
2035	\$ -	\$ -	\$ -
2036	\$ -	\$ -	\$ -
2037	\$ -	\$ -	\$ -
2038	\$ -	\$ -	\$ -
2039	\$ -	\$ -	\$ -
2040	\$ -	\$ -	\$ -
2041	\$ -	\$ -	\$ -
2042	\$ -	\$ -	\$ -
2043	\$ -	\$ -	\$ -
2044	\$ -	\$ -	\$ -
2045	\$ 78,763,511	\$ 152,695,980	\$ 32,211,980
2046	\$ 167,311,059	\$ 340,805,941	\$ 71,894,715
2047	\$ 195,793,622	\$ 439,742,362	\$ 92,765,847
2048	\$ 214,553,540	\$ 478,672,799	\$ 100,978,418
2049	\$ 96,789,401	\$ 229,033,682	\$ 48,315,799
2050	\$ 53,355,651	\$ 118,291,924	\$ 24,954,272
2051	\$ 48,724,496	\$ 105,688,864	\$ 22,295,594
2052	\$ 15,376,748	\$ 35,043,045	\$ 7,392,505
2053	\$ 10,231,654	\$ 24,457,804	\$ 5,159,496
2054	\$ 10,231,654	\$ 25,183,531	\$ 5,312,592
2055	\$ 10,499,029	\$ 26,492,163	\$ 5,588,654
2056	\$ 10,258,221	\$ 26,771,188	\$ 5,647,516
2057	\$ 10,231,654	\$ 27,494,456	\$ 5,800,093
2058	\$ 10,499,029	\$ 28,913,976	\$ 6,099,548
2059	\$ 10,231,654	\$ 29,153,440	\$ 6,150,064
2060	\$ 10,258,221	\$ 30,099,417	\$ 6,349,622
2061	\$ 10,499,029	\$ 31,560,815	\$ 6,657,912
2062	\$ 10,231,654	\$ 31,834,274	\$ 6,715,599
2063	\$ 10,231,654	\$ 32,782,351	\$ 6,915,601
2064	\$ 10,525,596	\$ 34,542,553	\$ 7,286,924
2065	\$ 10,231,654	\$ 34,765,253	\$ 7,333,904
2066	\$ 10,231,654	\$ 35,801,854	\$ 7,552,580
2067	\$ 10,499,029	\$ 37,616,346	\$ 7,935,356
2068	\$ 10,258,221	\$ 38,069,840	\$ 8,031,023
2069	\$ 10,499,029	\$ 39,886,798	\$ 8,414,319
2070	\$ 10,231,654	\$ 40,271,277	\$ 8,495,427
2071	\$ 10,231,654	\$ 41,474,401	\$ 8,749,232
2072	\$ 10,525,596	\$ 43,668,394	\$ 9,212,066
2073	\$ 10,231,654	\$ 43,991,030	\$ 9,280,128
2074	\$ 10,231,654	\$ 45,306,799	\$ 9,557,696
2075	\$ 10,499,029	\$ 47,567,871	\$ 10,034,680
2076	\$ 10,258,221	\$ 48,185,757	\$ 10,165,026
2077	\$ 10,231,654	\$ 49,498,254	\$ 10,441,904
2078	\$ 28,016,192	\$ 118,874,316	\$ 25,077,131
2079	\$ 26,424,512	\$ 236,011,623	\$ 49,787,831
	\$ 1,183,198,487	\$ 3,150,250,377	\$ 664,561,050
Metro %	47.0%	47.0%	
Metro Share	\$ 556,103,289	\$ 1,480,617,677	
		44.8840%	
KS Jurisdictional Share --->		\$ 664,561,050	

Estimated Cost a Decommission (KEPCo Response)

In support of K.S.A. 66-128m (b)(6):

1. The amount of money which customers of each owner have been charged for decommissioning up to the date of submission of the plan; and
2. The total amount necessary to meet the projected decommission costs of the facility, over the remaining useful life of the facility.

Response

1. The amount of money that KEPCo's member have been charged for decommissioning to date equals the amount contributed by KEPCo to its Decommissioning Trust. The attached **Schedule A** shows the timing and amounts contributed to KEPCo's Decommissioning Trust since its inception. To date, KEPCo has contributed \$13,371,099.
2. Based on the Decommissioning Cost Analysis for the Wolf Creek Generating Station prepared by TLG Services, Inc. in June 2023, the estimated cost to decommission the Wolf Creek nuclear unit using the DECON alternative is \$1,171,363,486 in 2023 dollars. Based on a proposed escalation rate of 3.07 percent, the total amount necessary to decommission the facility is estimated to be \$3,039,317,169. KEPCo's six percent share of these costs equals \$182,359,030. See attached **Schedule B**.

**Kansas Electric Power Cooperative, Inc.
 Wolf Creek Generating Station Nuclear Decommissioning Trust
 Nuclear Decommissioning Trust Contributions**

Contribution Date	Contribution Year	Contribution Quarter	Contribution Amount
9/30/1986	1986	Q3	53,000.00
12/31/1986	1986	Q4	53,000.00
3/31/1987	1987	Q1	26,500.00
6/30/1987	1987	Q2	26,500.00
9/30/1987	1987	Q3	26,500.00
12/31/1987	1987	Q4	26,500.00
3/31/1988	1988	Q1	26,500.00
6/30/1988	1988	Q2	26,500.00
9/30/1988	1988	Q3	26,500.00
12/31/1988	1988	Q4	26,500.00
3/31/1989	1989	Q1	26,500.00
6/30/1989	1989	Q2	26,500.00
9/30/1989	1989	Q3	26,500.00
12/31/1989	1989	Q4	26,500.00
3/31/1990	1990	Q1	59,450.00
6/30/1990	1990	Q2	59,450.00
9/30/1990	1990	Q3	59,450.00
12/31/1990	1990	Q4	59,450.00
3/31/1991	1991	Q1	59,450.00
6/30/1991	1991	Q2	59,450.00
9/30/1991	1991	Q3	59,450.00
12/31/1991	1991	Q4	59,450.00
3/31/1992	1992	Q1	59,450.00
6/30/1992	1992	Q2	59,450.00
9/30/1992	1992	Q3	59,450.00
12/31/1992	1992	Q4	59,450.00
3/31/1993	1993	Q1	66,584.00
6/30/1993	1993	Q2	66,584.00
9/30/1993	1993	Q3	66,584.00
12/31/1993	1993	Q4	66,584.00
3/31/1994	1994	Q1	66,584.00
6/30/1994	1994	Q2	66,584.00
9/30/1994	1994	Q3	66,584.00
12/31/1994	1994	Q4	66,584.00
3/31/1995	1995	Q1	66,584.00
6/30/1995	1995	Q2	66,584.00
9/30/1995	1995	Q3	66,584.00
12/31/1995	1995	Q4	66,584.00
3/31/1996	1996	Q1	66,584.00
6/30/1996	1996	Q2	66,584.00
9/30/1996	1996	Q3	66,584.00
12/31/1996	1996	Q4	66,584.00
3/31/1997	1997	Q1	53,364.00
6/30/1997	1997	Q2	53,364.00

9/30/1997	1997	Q3	53,364.00
12/31/1997	1997	Q4	53,364.00
3/31/1998	1998	Q1	53,364.00
6/30/1998	1998	Q2	53,364.00
9/30/1998	1998	Q3	53,364.00
12/31/1998	1998	Q4	53,364.00
3/31/1999	1999	Q1	53,364.00
6/30/1999	1999	Q2	53,364.00
9/30/1999	1999	Q3	53,364.00
12/31/1999	1999	Q4	53,364.00
3/31/2000	2000	Q1	59,629.75
6/30/2000	2000	Q2	59,629.75
9/28/2000	2000	Q3	131,484.25
12/27/2000	2000	Q4	83,581.25
3/30/2001	2001	Q1	84,834.00
6/30/2001	2001	Q2	84,834.00
9/27/2001	2001	Q3	84,834.00
12/26/2001	2001	Q4	84,834.00
3/29/2002	2002	Q1	86,107.50
6/28/2002	2002	Q2	86,107.50
9/27/2002	2002	Q3	86,107.50
12/30/2002	2002	Q4	86,107.50
3/28/2003	2003	Q1	87,400.00
6/27/2003	2003	Q2	87,400.00
9/29/2003	2003	Q3	87,400.00
12/29/2003	2003	Q4	106,850.00
3/29/2004	2004	Q1	108,450.00
6/28/2004	2004	Q2	108,450.00
9/30/2004	2004	Q3	108,450.00
12/30/2004	2004	Q4	108,450.00
3/30/2005	2005	Q1	110,076.00
6/30/2005	2005	Q2	110,076.00
9/30/2005	2005	Q3	110,076.00
12/29/2005	2005	Q4	110,076.00
3/30/2006	2006	Q1	111,726.00
6/29/2006	2006	Q2	111,726.00
9/28/2006	2006	Q3	111,726.00
12/28/2006	2006	Q4	52,674.00
3/29/2007	2007	Q1	98,400.00
6/28/2007	2007	Q2	98,400.00
9/27/2007	2007	Q3	98,400.00
12/28/2007	2007	Q4	98,400.00
3/26/2008	2008	Q1	99,900.00
6/27/2008	2008	Q2	99,900.00
9/30/2008	2008	Q3	99,900.00
12/30/2008	2008	Q4	99,900.00
3/27/2009	2009	Q1	101,400.00
6/27/2009	2009	Q2	101,400.00
9/29/2009	2009	Q3	101,400.00
12/30/2009	2009	Q4	147,020.00
3/30/2010	2010	Q1	114,495.00

6/29/2010	2010	Q2	114,495.00
9/28/2010	2010	Q3	114,495.00
12/29/2010	2010	Q4	114,495.00
3/29/2011	2011	Q1	116,250.00
6/29/2011	2011	Q2	116,250.00
9/29/2011	2011	Q3	116,250.00
12/29/2011	2011	Q4	116,250.00
3/30/2012	2012	Q1	117,960.00
6/29/2012	2012	Q2	117,960.00
9/28/2012	2012	Q3	117,960.00
12/28/2012	2012	Q4	117,960.00
3/28/2013	2013	Q1	98,040.00
6/27/2013	2013	Q2	98,040.00
9/27/2013	2013	Q3	98,040.00
12/27/2013	2013	Q4	98,040.00
3/28/2014	2014	Q1	99,510.00
6/27/2014	2014	Q2	99,510.00
9/29/2014	2014	Q3	99,510.00
12/29/2014	2014	Q4	99,510.00
3/30/2015	2015	Q1	101,100.00
6/29/2015	2015	Q2	121,350.00
9/29/2015	2015	Q3	121,350.00
12/30/2015	2015	Q4	141,690.00
3/30/2016	2016	Q1	123,180.00
6/29/2016	2016	Q2	123,180.00
9/29/2016	2016	Q3	123,180.00
12/29/2016	2016	Q4	123,180.00
3/29/2017	2017	Q1	125,025.00
6/29/2017	2017	Q2	125,025.00
9/29/2017	2017	Q3	125,025.00
12/29/2017	2017	Q4	125,025.00
3/29/2018	2018	Q1	126,900.00
6/28/2018	2018	Q2	126,900.00
9/27/2018	2018	Q3	126,900.00
12/28/2018	2018	Q4	126,900.00
3/28/2019	2019	Q1	136,005.00
6/27/2019	2019	Q2	136,005.00
9/27/2019	2019	Q3	136,005.00
12/30/2019	2019	Q4	136,005.00
3/27/2020	2020	Q1	136,005.00
6/26/2020	2020	Q2	136,005.00
9/28/2020	2020	Q3	136,005.00
12/29/2020	2020	Q4	136,005.00
3/30/2021	2021	Q1	137,550.00
6/29/2021	2021	Q2	137,550.00
9/29/2021	2021	Q3	137,550.00
12/29/2021	2021	Q4	137,550.00
3/30/2022	2022	Q1	137,550.00
6/29/2022	2022	Q2	137,550.00

9/28/2022	2022	Q3	137,550.00
12/28/2022	2022	Q4	137,550.00
3/30/2023	2023	Q1	137,550.00
6/29/2023	2023	Q2	137,550.00
			<hr/>
			13,371,099.00

***Note: From 1985 to 1999, KEPCo's records show total contribution for the year. Assumptions were made in above schedule, on when those contributions were made.**

DECOMMISSIONING COST ASSUMPTIONS

2023 Decom Cost Est	\$ 1,171,363,486
Cost Escalation Rate	3.07%
KEPCo Share	6.00%
Future Juris Allocation Factor	100.00%
Wtd Historical/Future Alloc Factor	100.00%

Year	2023 Wolf Creek Decom Cost	Escalated Wolf Creek Decom Cost	KEPCo Decom Cost
2023	\$ -	\$ -	\$ -
2024	\$ -	\$ -	\$ -
2025	\$ -	\$ -	\$ -
2026	\$ -	\$ -	\$ -
2027	\$ -	\$ -	\$ -
2028	\$ -	\$ -	\$ -
2029	\$ -	\$ -	\$ -
2030	\$ -	\$ -	\$ -
2031	\$ -	\$ -	\$ -
2032	\$ -	\$ -	\$ -
2033	\$ -	\$ -	\$ -
2034	\$ -	\$ -	\$ -
2035	\$ -	\$ -	\$ -
2036	\$ -	\$ -	\$ -
2037	\$ -	\$ -	\$ -
2038	\$ -	\$ -	\$ -
2039	\$ -	\$ -	\$ -
2040	\$ -	\$ -	\$ -
2041	\$ -	\$ -	\$ -
2042	\$ -	\$ -	\$ -
2043	\$ -	\$ -	\$ -
2044	\$ -	\$ -	\$ -
2045	\$ 78,763,511	\$ 152,696,006	\$ 9,161,760
2046	\$ 167,311,059	\$ 340,819,692	\$ 20,449,182
2047	\$ 195,793,622	\$ 439,779,969	\$ 26,386,798
2048	\$ 214,553,540	\$ 478,707,458	\$ 28,722,447
2049	\$ 96,789,401	\$ 229,048,514	\$ 13,742,911
2050	\$ 53,355,651	\$ 118,291,949	\$ 7,097,517
2051	\$ 48,724,496	\$ 105,688,864	\$ 6,341,332
2052	\$ 15,376,748	\$ 35,043,045	\$ 2,102,583
2053	\$ 10,231,654	\$ 24,457,804	\$ 1,467,468
2054	\$ 10,231,654	\$ 25,183,531	\$ 1,511,012
2055	\$ 10,499,029	\$ 26,492,163	\$ 1,589,530
2056	\$ 10,258,221	\$ 26,771,188	\$ 1,606,271
2057	\$ 10,231,654	\$ 27,494,456	\$ 1,649,667

2058	\$	10,499,029	\$	28,913,976	\$	1,734,839
2059	\$	10,231,654	\$	29,153,440	\$	1,749,206
2060	\$	10,258,221	\$	30,099,417	\$	1,805,965
2061	\$	10,499,029	\$	31,560,815	\$	1,893,649
2062	\$	10,231,654	\$	31,834,274	\$	1,910,056
2063	\$	10,231,654	\$	32,782,351	\$	1,966,941
2064	\$	10,525,596	\$	34,542,553	\$	2,072,553
2065	\$	10,231,654	\$	34,765,253	\$	2,085,915
2066	\$	10,231,654	\$	35,801,854	\$	2,148,111
2067	\$	10,499,029	\$	37,616,346	\$	2,256,981
2068	\$	10,258,221	\$	38,069,840	\$	2,284,190
2069	\$	10,499,029	\$	39,886,798	\$	2,393,208
2070	\$	10,231,654	\$	40,271,277	\$	2,416,277
2071	\$	10,231,654	\$	41,474,401	\$	2,488,464
2072	\$	10,525,596	\$	43,668,394	\$	2,620,104
2073	\$	10,231,654	\$	43,991,030	\$	2,639,462
2074	\$	10,231,654	\$	45,306,799	\$	2,718,408
2075	\$	10,499,029	\$	47,567,871	\$	2,854,072
2076	\$	10,258,221	\$	48,185,757	\$	2,891,145
2077	\$	10,231,654	\$	49,498,254	\$	2,969,895
2078	\$	28,016,192	\$	118,874,316	\$	7,132,459
2079	\$	14,589,512	\$	124,977,516	\$	7,498,651
		\$ 1,171,363,486	\$	3,039,317,169	\$	182,359,030

KEPCo %	6.0%	6.0%
KEPCo Share	<u>\$ 70,281,809</u>	<u>\$ 182,359,030</u>
		100.0000%
KS Jurisdictional Share --->		<u>\$ 182,359,030</u>