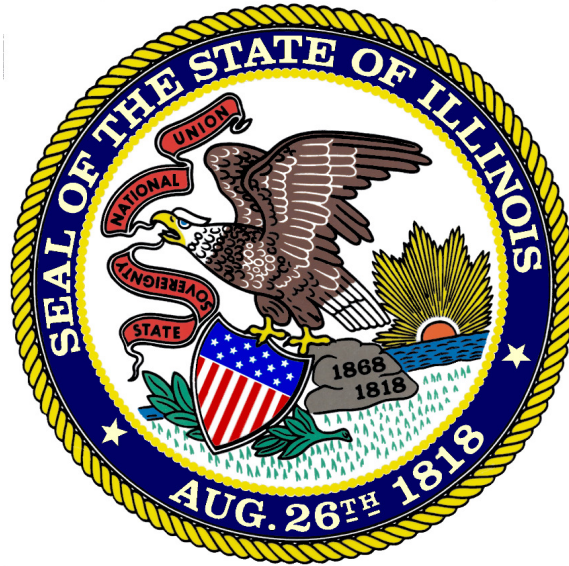


**NUCLEAR DECOMMISSIONING FUNDING ASSURANCE STATUS  
REPORTS SUBMITTED PURSUANT TO SECTION 8-508.1(g) OF THE  
ILLINOIS PUBLIC UTILITIES ACT**



**ILLINOIS COMMERCE COMMISSION**

**June 1, 2020**



STATE OF ILLINOIS

## ILLINOIS COMMERCE COMMISSION

527 East Capitol Avenue  
Springfield, Illinois 62701

160 North LaSalle  
Chicago, Illinois 60601

June 1, 2020

The Honorable Members of the Illinois General Assembly  
State Capitol  
Springfield, Illinois

Dear Honorable Members of the Illinois General Assembly:

The Illinois Commerce Commission submits the attached report to the General Assembly in accordance with 220 ILCS Section 8-508.1(g) of the Illinois Public Utilities Act. Beginning June 1, 2020, and every 2 years thereafter, the ICC is required to collect and transmit to the General Assembly a copy of the nuclear decommissioning funding assurance status report for shutdown units as submitted by the owner or operator of a nuclear power plant in this State to the Nuclear Regulatory Commission and, as applicable, to the Federal Energy Regulatory Commission.

Should you have questions regarding the attached report, please contact Michelle Kelm, Director of Governmental Affairs, at (217) 524-0619, or by email at [michelle.kelm@illinois.gov](mailto:michelle.kelm@illinois.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Carrie Zalewski".

Carrie Zalewski  
Chairman

The 101st General Assembly passed Public Act (“PA”) 101-44 amending Section 8-508.1 of Public Utilities Act (“PUA”). PA 101-44 became effective January 1, 2020. PA 101-44 adds a new subsection (g) to Section 8-508.1, which states:

(g) Beginning on or before May 1, 2020, and every 2 years thereafter, the owner or operator of each nuclear power plant in this State shall provide the Commission with a copy of the nuclear decommissioning funding assurance status report submitted to the Nuclear Regulatory Commission and, as applicable, to the Federal Energy Regulatory Commission. Beginning June 1, 2020, and every 2 years thereafter, the Commission shall provide the General Assembly with a copy of the nuclear decommissioning funding assurance status report for shutdown units as submitted by the owner or operator of a nuclear power plant in this State to the Nuclear Regulatory Commission and, as applicable, to the Federal Energy Regulatory Commission.

In response to the requirement of Section 8-508.1, the Commission received two nuclear decommissioning funding assurance status reports for shut down units.

Exelon Generation Company, LLC (“Exelon”) submitted a report dated March 31, 2020 providing decommissioning funding information applicable with respect to the Dresden Nuclear Power Station Unit 1, which Exelon states has been shut down since October 31, 1978. This report is attached herein and marked as Exhibit A.

Zion Solutions, LLC (“Zion Solutions”) submitted a report dated March 31, 2020 providing decommissioning funding information applicable with respect to Zion Nuclear Power Station Units 1 and 2, which Zion Solutions states has been shut down since February 13, 1998. This report is attached herein and marked as Exhibit B.

As noted above, and pursuant to Section 8-508.1(g) of the PUA, the nuclear decommissioning funding assurance status reports for shut down units received by the Commission are being transmitted with this report to the General Assembly.



4300 Winfield Road  
Warrenville, IL 60555  
630 657 2000 Office

RS-20-039

10 CFR 50.75(f)  
10 CFR 50.82(a)

March 31, 2020

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Dresden Nuclear Power Station, Unit 1  
Facility Operating License No. DPR-2  
NRC Docket Nos. 50-10

Peach Bottom Atomic Power Station, Unit 1  
Facility Operating License No. DPR-12  
NRC Docket Nos. 50-171

Three Mile Island Nuclear Station, Unit 1  
Renewed Facility Operating License No. DPR-50  
NRC Docket No. 50-289

RECEIVED  
APR -14 2020

ILLINOIS COMMERCE COMMISSION  
CHIEF CLERK'S OFFICE

Subject: Report on Status of Decommissioning Funding for Shutdown Reactors

In accordance with 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," paragraph (f), and 10 CFR 50.82, "Termination of license," paragraphs (a)(8)(v) and (a)(8)(vii), Exelon Generation Company, LLC (EGC) is submitting a report on the status of decommissioning funding as of December 31, 2019, for the reactors owned by EGC that are shutdown.

EGC currently maintains three shutdown units, Dresden Nuclear Power Station (Dresden), Unit 1, Peach Bottom Atomic Power Station (Peach Bottom), Unit 1, and Three Mile Island Nuclear Station (TMI), Unit 1. The annual radiological decommissioning funding status report for Dresden, Unit 1, is provided in Attachment 2. The annual radiological decommissioning funding status report for Peach Bottom, Unit 1, is provided in Attachment 3. The annual radiological decommissioning funding status report for TMI, Unit 1, is provided in Attachment 4.

Attachment 1 contains the Labor, Energy, and Burial factors used in the calculation of the formula cost amounts in this letter.

EGC has obtained site-specific decommissioning cost estimates for Dresden, Unit 1, Peach Bottom, Unit 1, and TMI, Unit 1, as required, in accordance with 10 CFR 50.75(f) and 10 CFR 50.82, paragraphs (a)(4)(i), (a)(8)(iii), and (a)(8)(v)(B). Accordingly, the amount of decommissioning funds estimated to be required is based on site-specific decommissioning cost estimates for Dresden, Unit 1, Peach Bottom, Unit 1, and TMI, Unit 1. Unless otherwise noted, the specific cash flow analysis for the site-specific decommissioning cost estimates conservatively assumes all expenses in a year are incurred at the beginning of year

(i.e., beginning of year convention) during the decommissioning period. The cash flow analysis for Peach Bottom, Unit 1, assumes that half of the current year contributions to the Peach Bottom, Unit 1, trust fund is included in the current year earnings to estimate the amount of contributions throughout the year (i.e., a mid-year convention). EGC uses a mid-year convention in this instance because contributions to the Peach Bottom, Unit 1, trust fund are made monthly at a constant rate throughout the year. Site-specific cash flows from the site-specific cost estimates for Dresden, Unit 1, Peach Bottom, Unit 1, and TMI, Unit 1, are included in Attachments 2, 3, and 4, respectively.

EGC has not made a final determination of the decommissioning approach for any of its nuclear units, including the shutdown units. For these shutdown units, EGC uses the site-specific decommissioning cost estimates to demonstrate adequacy of funding to meet regulatory requirements. While the site-specific cost estimates assume a decommissioning option, EGC may select a different decommissioning option in the future for any of its shutdown nuclear units, recognizing that the chosen approach must meet NRC requirements for decommissioning funding.

The decommissioning funding status reports provided in Attachments 2 and 4 confirm that adequate decommissioning funding is assured for Dresden, Unit 1, and TMI, Unit 1.

Due to recent market performance, Peach Bottom, Unit 1, did not meet the minimum funding assurance criteria under 10 CFR 50.75 and 10 CFR 50.82 as of December 31, 2019, based solely on the trust fund balance. Financial assurance for decommissioning this reactor is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii). The source of revenue for the external sinking fund is a "non-bypassable charge" approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. The amount to be collected will be adjusted, as necessary, in accordance with the applicable tariff in the next submission to the PaPUC of the Nuclear Decommissioning Cost Adjustment (NDCA) to cover any funding shortfall that exists at that time. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The next rate adjustment will be effective January 1, 2023. The PaPUC has been notified that the amount collected may need to be adjusted in the next filing. EGC's ability to adjust the amount collected for Peach Bottom, Unit 1, is consistent with the guidance in Regulatory Guide 1.159, "Assuring Availability of Funds for Decommissioning Nuclear Reactors," Revision 2, page 13, which provides that, "Adjustments to the annual amount of funds being set aside may be made to coincide with rate cases considered by a licensee's public utility commission (PUC)."

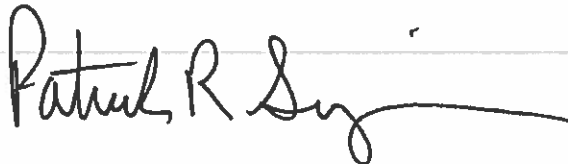
Disbursements made through December 31, 2019, from the decommissioning trust funds since the last report, other than those for allowed administrative costs and other incidental expenses of the fund in connection with the operation of the fund per 10 CFR 50.75(h)(1)(iv), were for decommissioning planning and, in the case of Dresden, Unit 1, and TMI, Unit 1, for decommissioning activities as outlined in Attachments 2 and 4.

U.S. Nuclear Regulatory Commission  
March 31, 2020  
Page 3

There are no regulatory commitments contained within this letter.

If you have any questions concerning this letter, please contact me at (630) 657-2823.

Respectfully,

A handwritten signature in black ink, reading "Patrick R. Simpson". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Patrick R. Simpson  
Senior Manager – Licensing  
Exelon Generation Company, LLC

**Attachments:**

1. Labor, Energy, and Burial Factors Used in Calculations (All Facilities)
2. Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management Report for Dresden Nuclear Power Station, Unit 1
3. Annual Radiological Decommissioning Funding Assurance Report for Peach Bottom Atomic Power Station, Unit 1
4. Annual Radiological Decommissioning Funding Assurance Report for Three Mile Island Nuclear Station, Unit 1

cc: Regional Administrator – NRC Region I  
Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Dresden Nuclear Power Station  
NRC Senior Resident Inspector – Peach Bottom Atomic Power Station  
NRC Senior Resident Inspector – Three Mile Island Nuclear Station

**ATTACHMENT 1**

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**Labor, Energy, and Burial Factors Used in Calculations (All Facilities)**

**ATTACHMENT 1**  
**Labor, Energy, and Burial Factors Used in Calculations (All Facilities)**

The labor, energy, and burial indexes used are consistent with those described in NUREG-1307, Revision 17, "Report on Waste Burial Charges," issued February 2019.

The current labor cost indexes used are obtained from the Employment Cost Index, published by the U.S. Department of Labor, Bureau of Labor Statistics (BLS). Specifically, Exelon Generation Company, LLC (EGC) used the Employment Cost Index for total compensation for private industry workers by region. The labor adjustment factors were calculated according to Section 3.2 of NUREG-1307, Revision 17, using fourth quarter 2019 data. Table 1 shows the data used for this calculation.

**Table 1: Labor Adjustment Factors**

Region	Applicable Sites	Series ID	4Q2019 Index Number	Base $L_x$	Labor Adjustment Factor ( $L_x$ )
Northeast	TMI	CIU2010000000210I	140.7	2.16	3.039
Midwest	Dresden	CIU2010000000230I	135.7	2.08	2.823

The current energy cost indexes used are obtained from Producer Price Indexes (PPI) – Commodities, published by the U.S. Department of Labor, BLS. Specifically, EGC used the PPI for industrial electric power (WPU0543) and light fuel oils (WPU0573). The energy adjustment factors were calculated according to Section 3.3 of NUREG-1307, Revision 17, using December 2019 data. Table 2 shows the data used for this calculation.

**Table 2: Energy Adjustment Factors**

WPU0543 – January 1986 (base value)	114.2
WPU0573 – January 1986 (base value)	82.0
WPU0543 – December 2019 (preliminary value)	237.9
WPU0573 – December 2019 (preliminary value)	222.6
Industrial electric power adjustment factor - $P_x$	2.083
Light fuel oil adjustment factor - $F_x$	2.715
Energy Adjustment Factor (PWR) – $E_x(\text{PWR})$	2.348
Energy Adjustment Factor (BWR) – $E_x(\text{BWR})$	2.374



**ATTACHMENT 1 (Continued)**  
**Labor, Energy, and Burial Factors Used in Calculations (All Facilities)**

The waste burial adjustment factors used are taken from Table 2-1 of NUREG-1307, Revision 17, based on 2018 data. The adjustment factors EGC used assume a combination of compact-affiliated and non-compact facilities for sites affiliated with a compact. This is consistent with current waste disposal practices at EGC and consistent with typical waste disposal practices during decommissioning. For sites not affiliated with a compact, the values for generators located in unaffiliated states were used. Table 3 summarizes the data used for the calculation of the waste adjustment factors.

**Table 3: Waste Adjustment Factors**

<b>LLW Burial Site</b>	<b>Reactor Type</b>	<b>Applicable Site</b>	<b>Combination of Compact-Affiliated and Non-Compact Disposal Facilities Waste Adjustment Factor (B<sub>x</sub>)</b>	<b>Generators Located in the Unaffiliated States and those Located in Compact-Affiliated States having no Disposal Facility Waste Adjustment Factor (B<sub>x</sub>)</b>
Generic LLW Disposal Site	BWR	Dresden	N/A	13.422
Generic LLW Disposal Site	PWR	TMI	N/A	12.853

The calculation methodology used for all adjustment factors is consistent with NUREG-1307, Revision 17.

**ATTACHMENT 2**

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**Annual Radiological Decommissioning Funding Assurance and Spent Fuel Management  
Report for Dresden Nuclear Power Station, Unit 1**

**ATTACHMENT 2**  
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel**  
**Management Report for Dresden Nuclear Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$450,303 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2019	\$390,155 (c)
5	Schedule of the annual amounts remaining to be collected	\$0
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v)	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i)	
9	The trust fund agreements were amended effective September 30, 2019 to reflect a change of the company holding the trusts from a Nevada LLC to an Illinois LLC	
10	2019 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$2,098 (e)
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$129,080 (f)
	Reimbursed from the decommissioning trust fund	\$123,564 (g)
	Not yet reimbursed from the decommissioning trust fund	\$5,515 (h)
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2019	\$41,087 (i)
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B)	\$47,421(a)

**ATTACHMENT 2 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel**  
**Management Report for Dresden Nuclear Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

- (a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Dresden, Unit 1, has been shutdown since October 31, 1978, and some decommissioning activities have already occurred on this unit. However, the amount to decommission Dresden, Unit 1, was calculated pursuant to 10 CFR 50.75(c) to be \$585.0 million (as of December 31, 2019). Dresden, Unit 1, was a BWR reactor that operated at a maximum power level of 700 MWt (< 1200 MWt as specified in 10 CFR 50.75(c)). This amount assumes Dresden, Unit 1, was a BWR reactor type rated at a power capacity of 1200 MWt as required by the formula in 10 CFR 50.75(c). The calculation of this value assumes the labor, energy, and burial factors described in Attachment 1 and does not account for decommissioning activities that have occurred for Dresden, Unit 1.

In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1726-009, Revision 0, "Decommissioning Cost Analysis for the Dresden Nuclear Power Station Unit 1," December 2017). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Dresden Nuclear Power Station, Unit 1, Post-Shutdown Decommissioning Activities Report (PSDAR), as most recently updated in a letter from Michael P. Gallagher (EGC) to U.S. Nuclear Regulatory Commission dated March 19, 2018. The costs have been escalated from the 2017 dollars reflected in the 2017 decommissioning cost estimate to estimated costs as of December 31, 2019.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. Also, the amount reported does not include cash flows from the SSCE estimate for the 2017 through 2019 annual radiological costs because EGC considers the SSCE estimated costs for 2017 through 2019 decommissioning activities to be historical expenditures at the time the 2020 decommissioning funding assurance report is generated.

Decontamination and dismantlement of Dresden Nuclear Power Station, Unit 1, will take place no earlier than 2029, coinciding with the decommissioning of Dresden Nuclear Power Station, Unit 2.

- (b) ISFSI decommissioning cost is included in the Dresden Nuclear Power Station, Unit 2 and Unit 3 site specific cost estimates.

**ATTACHMENT 2 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel**  
**Management Report for Dresden Nuclear Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

- (c) The trust fund amount is the amount allocated for radiological decommissioning only. The allocation of funds for radiological decommissioning is based on the fraction of radiological decommissioning costs to radiological decommissioning costs plus spent fuel management costs identified in the DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1726-009, Revision 0, "Decommissioning Cost Analysis for the Dresden Nuclear Power Station Unit 1," December 2017). This allocation is for purposes of demonstrating adequate decommissioning funding assurance only and is adjusted, as necessary, to provide adequate funding assurance for radiological decommissioning and spent fuel management. No spent fuel management costs are planned to be incurred until 2029.

There are no past-due tax payments owed on the decommissioning trust fund activities as of December 31, 2019. Periodic payments of estimated income taxes are made by EGC during the year on a quarterly basis. EGC then obtains reimbursement from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2019.

- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) The amount spent on decommissioning in 2019 is consistent with the projected 2019 expense total of \$3,526 (December 31, 2019 thousands of dollars) from the site-specific cost estimate. The delta of \$1,428 can be attributed to lower dormancy costs in 2019 than projected in the site specific cost estimate.

The amount spent on decommissioning in 2019 represents the 2019 charges to the Dresden, Unit 1, project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.

- (f) Not all historical data was available, and therefore, the cumulative amounts spent on decommissioning are estimates based on the best information obtainable at this time.
- (g) Not all historical data was available, and therefore, the amount reimbursed is an estimate based on the best information obtainable at this time.
- (h) The amount not yet reimbursed is an estimate based on the best information obtainable at this time.

**ATTACHMENT 2 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel  
Management Report for Dresden Nuclear Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

- (i) The allocation of funds accumulated for managing irradiated fuel is based on the fraction of spent fuel management costs to radiological decommissioning costs plus spent fuel management costs identified in the DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1726-009, Revision 0, "Decommissioning Cost Analysis for the Dresden Nuclear Power Station Unit 1," December 2017). This allocation is for purposes of demonstrating adequate decommissioning funding assurance only and is adjusted, as necessary, to provide adequate funding assurance for radiological decommissioning and spent fuel management. No spent fuel management costs are planned to be incurred until 2029.
-

**ATTACHMENT 2 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel**  
**Management Report for Dresden Nuclear Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

Year	Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2020	\$3,536	\$390,155	\$386,619	\$7,732	\$394,352
2021	\$3,526	\$394,352	\$390,825	\$7,817	\$398,642
2022	\$3,526	\$398,642	\$395,116	\$7,902	\$403,018
2023	\$3,526	\$403,018	\$399,492	\$7,990	\$407,482
2024	\$3,536	\$407,482	\$403,946	\$8,079	\$412,025
2025	\$3,526	\$412,025	\$408,499	\$8,170	\$416,668
2026	\$3,526	\$416,668	\$413,142	\$8,263	\$421,405
2027	\$3,526	\$421,405	\$417,879	\$8,358	\$426,237
2028	\$3,526	\$426,237	\$422,710	\$8,454	\$431,165
2029	\$43,512	\$431,165	\$387,652	\$7,753	\$395,405
2030	\$91,000	\$395,405	\$304,405	\$6,088	\$310,493
2031	\$104,014	\$310,493	\$206,479	\$4,130	\$210,609
2032	\$71,983	\$210,609	\$138,626	\$2,773	\$141,399
2033	\$63,611	\$141,399	\$77,788	\$1,556	\$79,343
2034	\$2,479	\$79,343	\$76,864	\$1,537	\$78,402
2035	\$2,479	\$78,402	\$75,923	\$1,518	\$77,441
2036	\$2,479	\$77,441	\$74,962	\$1,499	\$76,461
2037	\$19,732	\$76,461	\$56,729	\$1,135	\$57,864
2038	\$7,571	\$57,864	\$50,293	\$1,006	\$51,299
2039	\$106	\$51,299	\$51,194	\$1,024	\$52,217
2040	\$60	\$52,217	\$52,157	\$1,043	\$53,200
2041	\$0	\$53,200	\$53,200	\$1,064	\$54,264
2042	\$0	\$54,264	\$54,264	\$1,085	\$55,349
2043	\$0	\$55,349	\$55,349	\$1,107	\$56,456
2044	\$0	\$56,456	\$56,456	\$1,129	\$57,586
2045	\$0	\$57,586	\$57,586	\$1,152	\$58,737
2046	\$0	\$58,737	\$58,737	\$1,175	\$59,912
2047	\$0	\$59,912	\$59,912	\$1,198	\$61,110
2048	\$0	\$61,110	\$61,110	\$1,222	\$62,332
2049	\$0	\$62,332	\$62,332	\$1,247	\$63,579
2050	\$9,069	\$63,579	\$54,510	\$1,090	\$55,600
2051	\$453	\$55,600	\$55,148	\$1,103	\$56,251

**Total\*           \$450,303**

\*Column may not add due to rounding

**ATTACHMENT 2 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance and Spent Fuel**  
**Management Report for Dresden Nuclear Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

<b>Year</b>	<b>Irradiated Fuel Cost</b>	<b>BOY Irradiated Fuel Trust Fund Value</b>	<b>BOY Irradiated Fuel Trust Fund Less Cost</b>	<b>Irradiated Fuel Trust Fund Earnings</b>	<b>EOY Irradiated Fuel Trust Fund Value</b>
2020	\$0	\$41,087	\$41,087	\$822	\$41,909
2021	\$0	\$41,909	\$41,909	\$838	\$42,747
2022	\$0	\$42,747	\$42,747	\$855	\$43,602
2023	\$0	\$43,602	\$43,602	\$872	\$44,474
2024	\$0	\$44,474	\$44,474	\$889	\$45,364
2025	\$0	\$45,364	\$45,364	\$907	\$46,271
2026	\$0	\$46,271	\$46,271	\$925	\$47,196
2027	\$0	\$47,196	\$47,196	\$944	\$48,140
2028	\$0	\$48,140	\$48,140	\$963	\$49,103
2029	\$437	\$49,103	\$48,666	\$973	\$49,639
2030	\$513	\$49,639	\$49,126	\$983	\$50,108
2031	\$513	\$50,108	\$49,595	\$992	\$50,587
2032	\$513	\$50,587	\$50,074	\$1,001	\$51,075
2033	\$637	\$51,075	\$50,438	\$1,009	\$51,447
2034	\$1,509	\$51,447	\$49,938	\$999	\$50,936
2035	\$1,509	\$50,936	\$49,427	\$989	\$50,416
2036	\$1,509	\$50,416	\$48,907	\$978	\$49,885
2037	\$1,906	\$49,885	\$47,979	\$960	\$48,938
2038	\$2,491	\$48,938	\$46,447	\$929	\$47,376
2039	\$2,560	\$47,376	\$44,816	\$896	\$45,713
2040	\$2,616	\$45,713	\$43,096	\$862	\$43,958
2041	\$2,699	\$43,958	\$41,259	\$825	\$42,084
2042	\$2,692	\$42,084	\$39,392	\$788	\$40,180
2043	\$2,692	\$40,180	\$37,488	\$750	\$38,238
2044	\$5,148	\$38,238	\$33,090	\$662	\$33,752
2045	\$3,929	\$33,752	\$29,823	\$596	\$30,420
2046	\$2,692	\$30,420	\$27,728	\$555	\$28,283
2047	\$2,692	\$28,283	\$25,591	\$512	\$26,103
2048	\$2,692	\$26,103	\$23,411	\$468	\$23,879
2049	\$2,699	\$23,879	\$21,180	\$424	\$21,603
2050	\$2,772	\$21,603	\$18,831	\$377	\$19,208
2051	\$0	\$19,208	\$19,208	\$384	\$19,592

**Total\*           \$47,421**

\*Column may not add due to rounding



**ATTACHMENT 3**

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**Annual Radiological Decommissioning Funding Assurance Report  
for Peach Bottom Atomic Power Station, Unit 1**

**ATTACHMENT 3**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Peach Bottom Atomic Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	N/A (a)
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$269,720 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (h)
4	The amount of decommissioning trust funds accumulated as of December 31, 2019	\$131,929 (b)
5	Schedule of the annual amounts remaining to be collected.	\$3,860 (c)
6	Assumptions used regarding rates of escalation for decommissioning costs, earnings on funds, and other factors used in funding projections	3% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).	
8	Financial assurance for decommissioning is provided by the external sinking fund method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(ii).	
9	The trust fund agreements were amended effective September 30, 2019 to reflect a change of the company holding the trusts from a Nevada LLC to an Illinois LLC.	
10	2019 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$4,259 (e)
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A).	\$11,539 (f)
	Reimbursed from the decommissioning trust fund	\$4,094
	Not yet reimbursed from the decommissioning trust fund	\$7,444 (g)
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2019.	N/A (h)
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B).	N/A (h)

**ATTACHMENT 3 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Peach Bottom Atomic Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

- (a) A formula cost amount using the formula in 10 CFR 50.75(c) is not applicable because Peach Bottom, Unit 1, has been shutdown since October 31, 1974, and some decommissioning activities have already occurred on this unit. Furthermore, Peach Bottom, Unit 1, was a High Temperature Gas Cooled Reactor (HTGR), which does not translate to a BWR or PWR as specified in the formula for calculating the formula cost amount, and hence a formula cost amount per 10 CFR 50.75(c) cannot be calculated for Peach Bottom, Unit 1.

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In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a DECON scenario as described in the site-specific cost estimate (SSCE) (TLG Report E16-1640-015, Revision 0, "Decommissioning Cost Analysis for the Peach Bottom Atomic Power Station Unit 1," August 2015). The decommissioning cost estimate has been adjusted consistent with the description of planned decommissioning activities in the Peach Bottom, Unit 1, Decommissioning Plan. The costs have been escalated from the mid-year 2015 dollars reflected in the SSCE to estimated costs as of December 31, 2019.

Decommissioning expenditures prior to the year the SSCE updates were prepared (historical expenditures) are not included in the estimated total cost of decommissioning in the final SSCE reports. Also, the amount reported does not include cash flows from the SSCE for the annual radiological decommissioning costs for 2015 through 2019. EGC considers the SSCE estimated costs for 2015 through 2019 decommissioning activities to be historical expenditures at the time the 2020 decommissioning funding assurance report is generated.

Decontamination and dismantlement of Peach Bottom, Unit 1, will take place no earlier than 2033, coinciding with the decommissioning of Peach Bottom, Unit 2.

- (b) The trust fund amount is the amount allocated for Radiological Decommissioning only. There are no past-due tax payments related to decommissioning trust fund activities as of December 31, 2019. Periodic payments of estimated income taxes are made by EGC during the year on a quarterly basis. EGC then obtains reimbursement from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2019.
- (c) The funding mechanism being used as the source of revenues for the external sinking funds is a non-bypassable charge approved by the Pennsylvania Public Utilities Commission (PaPUC) authorizing PECO Energy Company to continue to collect decommissioning funds for EGC. Any needed adjustments to the amount collected will be made in the next filing of the Nuclear Decommissioning Cost Adjustment (NDCA) to the PaPUC. This cost adjustment is made every five years pursuant to PaPUC Electric Tariff No. 4. The last adjustment was effective January 1, 2018, and allows for the collection of annual payments from ratepayers of \$3,860K through 2032.

**ATTACHMENT 3 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Peach Bottom Atomic Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

- (d) 10 CFR 50.75(e)(1)(ii) allows licensees to use a rate of return higher than 2% if the applicable rate-setting authority has specifically authorized a higher rate. The PaPUC approved a 3% real rate of return as part of the approval of the restructuring plan for PECO Energy Company (Letter from J. J. McNulty (PaPUC) to B. D. Crowe (PECO Energy Company), "Approval of Restructuring Plan for PECO Energy Company under Section 2806 of the Public Utility Code; Docket No. R-00973953," dated May 3, 2001). Accordingly, EGC uses a 3% real rate of return. The 3% is applicable through the decommissioning period as described in RAI #1 response provided in the Letter from Patrick R. Simpson (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information Related to 2013 Report on Status of Decommissioning Funding for Reactors," dated August 15, 2013.
- (e) The amount spent on decommissioning in 2019 is lower than the amount budgeted at the station. Even though the amount exceeds the projected 2019 expense total of \$222 (December 31, 2019 thousands of dollars) from the site-specific cost estimate, it is immaterial to the overall funding assurance analysis. The \$4,037 (thousands of dollars) difference between actual and projected is the result of activities related to hazardous material remediation and containment shell maintenance.
- The amount spent on decommissioning in 2019 represents the 2019 charges to the Peach Bottom, Unit 1, project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.
- (f) The cumulative amount spent on decommissioning is an estimate based on the best information obtainable at this time.
- (g) The amount not yet reimbursed is an estimate based on the best information obtainable at this time.
- (h) Peach Bottom, Unit 1, was shut down in October of 1974, with defueling of the core completed by the following June. Starting in 1975, the spent fuel was shipped by truck to Idaho. The final of 44 shipments was completed in February of 1977. Consequently, no irradiated fuel for Peach Bottom, Unit 1, remains on-site; therefore, 10 CFR 50.82(a)(8)(vii) and 10 CFR 72.30(b) do not apply.

**ATTACHMENT 3 (Continued)**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Peach Bottom Atomic Power Station, Unit 1**  
(December 31, 2019 dollars, thousands)

Year	Radiological Decommissioning Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost**	First Half Contributions	Trust Fund Earnings	Second Half Contributions	EOY Trust Fund Value
2020	\$223	\$131,929	\$131,706	\$1,930	\$4,009	\$1,930	\$139,575
2021	\$222	\$139,575	\$139,353	\$1,930	\$4,238	\$1,930	\$147,451
2022	\$222	\$147,451	\$147,229	\$1,930	\$4,475	\$1,930	\$155,563
2023	\$222	\$155,563	\$155,341	\$1,930	\$4,718	\$1,930	\$163,919
2024	\$223	\$163,919	\$163,696	\$1,930	\$4,969	\$1,930	\$172,525
2025	\$222	\$172,525	\$172,303	\$1,930	\$5,227	\$1,930	\$181,390
2026	\$222	\$181,390	\$181,167	\$1,930	\$5,493	\$1,930	\$190,520
2027	\$222	\$190,520	\$190,298	\$1,930	\$5,767	\$1,930	\$199,925
2028	\$223	\$199,925	\$199,702	\$1,930	\$6,049	\$1,930	\$209,611
2029	\$222	\$209,611	\$209,388	\$1,930	\$6,340	\$1,930	\$219,588
2030	\$222	\$219,588	\$219,365	\$1,930	\$6,639	\$1,930	\$229,864
2031	\$222	\$229,864	\$229,642	\$1,930	\$6,947	\$1,930	\$240,449
2032	\$223	\$240,449	\$240,226	\$1,930	\$7,265	\$1,930	\$251,351
2033	\$39,810	\$251,351	\$211,541	\$0	\$6,346	\$0	\$217,887
2034	\$59,966	\$217,887	\$157,921	\$0	\$4,738	\$0	\$162,659
2035	\$69,207	\$162,659	\$93,452	\$0	\$2,804	\$0	\$96,255
2036	\$50,539	\$96,255	\$45,716	\$0	\$1,371	\$0	\$47,087
2037	\$44,845	\$47,087	\$2,243	\$0	\$67	\$0	\$2,310
2038	\$2,459	\$2,310	\$(149)	\$0	\$0	\$0	\$(149)

**Total\*            \$269,720**

\* Columns may not add due to rounding

\*\* Annual contributions added to individual years - Earnings of half of contributions are included in current year to estimate payment of contributions throughout the year

**ATTACHMENT 4**

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**Annual Radiological Decommissioning Funding Assurance Report  
for Three Mile Island Nuclear Station, Unit 1**

**ATTACHMENT 4**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Three Mile Island Nuclear Station, Unit 1**  
(December 31, 2019 dollars, thousands)

1	Formula cost amount per 10 CFR 50.75(c)	\$498,570
2	Site-specific cost amount per 10 CFR 50.75(b)(4) and 50.75(f)	\$997,904 (a)
3	Site-specific cost amount per 10 CFR 72.30(b)	N/A (b)
4	The amount of decommissioning trust funds accumulated as of December 31, 2019	\$750,802 (c)
5	Schedule of the annual amounts remaining to be collected	\$0
6	Assumptions used regarding rates of escalation, earnings, and other factors used in funding projections	2% (d)
7	There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v)	
8	Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i)	
9	The trust fund agreements were amended effective September 30, 2019 to reflect a change of the company holding the trusts from a Nevada LLC to an Illinois LLC	
10	2019 annual amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$21,609 (e)
11	Cumulative amount spent on decommissioning in accordance with 10 CFR 50.82(a)(8)(v)(A)	\$26,910 (g)
	Reimbursed from the decommissioning trust fund	\$9,052
	Not yet reimbursed from the decommissioning trust fund	\$17,858 (f)
12	Amount of funds accumulated to cover the cost of managing irradiated fuel pursuant to 10 CFR 50.82(a)(8)(vii)(A) as of December 31, 2019	(c)
13	Projected cost of managing irradiated fuel based on site-specific estimate per 10 CFR 50.82(a)(8)(vii)(B)	\$134,407 (a)
14	2019 annual amount spent on irradiated fuel management	\$24,653 (e)
15	Cumulative amount spent on irradiated fuel management	\$24,653 (g)
	Reimbursed from the decommissioning trust fund	\$0
	Not yet reimbursed from the decommissioning trust fund	\$24,653 (f)

**ATTACHMENT 4**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Three Mile Island Nuclear Station, Unit 1**  
(December 31, 2019 dollars, thousands)

- (a) In accordance with the regulatory requirements, the site-specific amount is reported per 10 CFR 50.75(b)(4), 50.75(f), 50.82(a)(8)(iii), and 50.82(a)(8)(v)(B) and assumes a SAFSTOR scenario as described in the site-specific cost estimate (SSCE) ("Site-Specific Decommissioning Cost Estimate for Three Mile Island Nuclear Station, Unit 1," April 5, 2019). The costs have been escalated from the 2018 dollars reflected in the decommissioning cost estimate to estimated costs as of December 31, 2019.

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The amount reported does not include cash flows from the SSCE estimate for the 2019 annual radiological and spent fuel costs because EGC considers the SSCE estimated cost for 2019 decommissioning activities to be historical expenditures at the time the 2020 decommissioning funding assurance report is generated.

- (b) Three Mile Island does not have an ISFSI. Therefore, 10 CFR 72 does not apply to Three Mile Island.
- (c) The trust fund amount is the amount allocated for Radiological Decommissioning and Spent Fuel Management. There are no past-due tax payments related to decommissioning trust fund activities as of December 31, 2019. Periodic payments of estimated income taxes are made by EGC during the year on a quarterly basis. EGC then obtains reimbursements from the trust funds. The reported trust fund amounts comply with the reporting requirements of 10 CFR 50.75(f) in that the amount of funds reported are those that were accumulated as of December 31, 2019.
- (d) A 2% annual real rate of return is used as allowed by 10 CFR 50.75(e)(1)(i).
- (e) The amount spent on decommissioning in 2019 is consistent with the projected 2019 expense total of \$20,999 (December 31, 2019 thousands of dollars) from the site-specific cost estimate.

The amount spent on irradiated fuel management in 2019 is consistent with the projected 2019 expense total of \$27,092 (December 31, 2018 thousands of dollars) from the site-specific cost estimate (SSCE). The delta of \$2,439 can be attributed to spent fuel management work not performed in 2019.

The amount spent on radiological decommissioning and irradiated fuel management in 2019 represents the 2019 charges to the TMI, Unit 1, project. Prior to reimbursement from the decommissioning trust fund, these charges will be validated to confirm they are legitimate decommissioning expenses. Consequently, the amount reimbursed may differ from the value provided.

- (f) The amount not yet reimbursed is an estimate based on the best information obtainable at this time.
- (g) The cumulative amount spent is an estimate based on the best information obtainable at this time.



**ATTACHMENT 4**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Three Mile Island Nuclear Station, Unit 1**  
(December 31, 2019 dollars, thousands)

<b>Year</b>	<b>Radiological Decommissioning and Spent Fuel Cost</b>	<b>BOY Trust Fund Value</b>	<b>BOY Trust Fund Value Less Cost</b>	<b>Trust Fund Earnings</b>	<b>EOY Trust Fund Value</b>
2020	\$99,907	\$750,802	\$650,894	\$13,018	\$663,912
2021	\$72,802	\$663,912	\$591,110	\$11,822	\$602,932
2022	\$54,302	\$602,932	\$548,630	\$10,973	\$559,603
2023	\$10,462	\$559,603	\$549,140	\$10,983	\$560,123
2024	\$10,492	\$560,123	\$549,632	\$10,993	\$560,624
2025	\$10,462	\$560,624	\$550,162	\$11,003	\$561,165
2026	\$10,462	\$561,165	\$550,703	\$11,014	\$561,717
2027	\$10,462	\$561,717	\$551,255	\$11,025	\$562,280
2028	\$10,491	\$562,280	\$551,789	\$11,036	\$562,825
2029	\$10,462	\$562,825	\$552,363	\$11,047	\$563,410
2030	\$10,462	\$563,410	\$552,948	\$11,059	\$564,007
2031	\$10,462	\$564,007	\$553,545	\$11,071	\$564,616
2032	\$10,491	\$564,616	\$554,125	\$11,082	\$565,207
2033	\$10,462	\$565,207	\$554,745	\$11,095	\$565,840
2034	\$13,770	\$565,840	\$552,070	\$11,041	\$563,111
2035	\$20,315	\$563,111	\$542,796	\$10,856	\$553,652
2036	\$5,843	\$553,652	\$547,809	\$10,956	\$558,765
2037	\$5,827	\$558,765	\$552,938	\$11,059	\$563,996
2038	\$5,827	\$563,996	\$558,169	\$11,163	\$569,332
2039	\$5,827	\$569,332	\$563,505	\$11,270	\$574,775
2040	\$5,843	\$574,775	\$568,932	\$11,379	\$580,310
2041	\$5,827	\$580,310	\$574,483	\$11,490	\$585,973
2042	\$5,827	\$585,973	\$580,146	\$11,603	\$591,748
2043	\$5,827	\$591,748	\$585,921	\$11,718	\$597,640
2044	\$5,843	\$597,640	\$591,796	\$11,836	\$603,632
2045	\$5,827	\$603,632	\$597,805	\$11,956	\$609,761
2046	\$5,827	\$609,761	\$603,934	\$12,079	\$616,012
2047	\$5,827	\$616,012	\$610,185	\$12,204	\$622,389
2048	\$5,843	\$622,389	\$616,545	\$12,331	\$628,876
2049	\$5,827	\$628,876	\$623,049	\$12,461	\$635,510
2050	\$5,827	\$635,510	\$629,683	\$12,594	\$642,276
2051	\$5,827	\$642,276	\$636,449	\$12,729	\$649,178

**ATTACHMENT 4**  
**Annual Radiological Decommissioning Funding Assurance Report for**  
**Three Mile Island Nuclear Station, Unit 1**  
(December 31, 2019 dollars, thousands)

Year	Radiological Decommissioning and Spent Fuel Cost	BOY Trust Fund Value	BOY Trust Fund Value Less Cost	Trust Fund Earnings	EOY Trust Fund Value
2052	\$5,843	\$649,178	\$643,335	\$12,867	\$656,202
2053	\$5,827	\$656,202	\$650,374	\$13,007	\$663,382
2054	\$5,827	\$663,382	\$657,554	\$13,151	\$670,705
2055	\$5,827	\$670,705	\$664,878	\$13,298	\$678,176
2056	\$5,843	\$678,176	\$672,332	\$13,447	\$685,779
2057	\$5,827	\$685,779	\$679,952	\$13,599	\$693,551
2058	\$5,827	\$693,551	\$687,724	\$13,754	\$701,478
2059	\$5,827	\$701,478	\$695,651	\$13,913	\$709,564
2060	\$5,843	\$709,564	\$703,720	\$14,074	\$717,795
2061	\$5,827	\$717,795	\$711,968	\$14,239	\$726,207
2062	\$5,827	\$726,207	\$720,380	\$14,408	\$734,787
2063	\$5,827	\$734,787	\$728,960	\$14,579	\$743,539
2064	\$5,843	\$743,539	\$737,696	\$14,754	\$752,450
2065	\$5,827	\$752,450	\$746,622	\$14,932	\$761,555
2066	\$5,827	\$761,555	\$755,728	\$15,115	\$770,842
2067	\$5,827	\$770,842	\$765,015	\$15,300	\$780,315
2068	\$5,843	\$780,315	\$774,472	\$15,489	\$789,961
2069	\$5,827	\$789,961	\$784,134	\$15,683	\$799,817
2070	\$5,827	\$799,817	\$793,989	\$15,880	\$809,869
2071	\$5,827	\$809,869	\$804,042	\$16,081	\$820,123
2072	\$5,843	\$820,123	\$814,279	\$16,286	\$830,565
2073	\$25,322	\$830,565	\$805,243	\$16,105	\$821,348
2074	\$62,744	\$821,348	\$758,604	\$15,172	\$773,776
2075	\$154,029	\$773,776	\$619,747	\$12,395	\$632,142
2076	\$114,892	\$632,142	\$517,250	\$10,345	\$527,595
2077	\$74,794	\$527,595	\$452,801	\$9,056	\$461,857
2078	\$74,631	\$461,857	\$387,226	\$7,745	\$394,970
2079	\$33,627	\$394,970	\$361,343	\$7,227	\$368,570
2080	\$136	\$368,570	\$368,434	\$7,369	\$375,802
2081	\$97	\$375,802	\$375,705	\$7,514	\$383,219

**Total\*        \$1,132,311**

\*Column may not add due to rounding



March 25, 2020

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

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Re: Docket Nos. RM05-15-000; RM94-14

Enclosed please find our annual Federal Energy Regulatory Commission (FERC) financial report as produced by our trustee, The Northern Trust Company. The Exelon Generation Company, LLC units are reported as follows:

- those formerly owned by Commonwealth Edison Company (Braidwood 1 & 2, Byron 1 & 2, Dresden 1, 2 & 3, LaSalle 1& 2, Zion 1& 2 and Quad Cities 1 & 2) – the reports are consolidated for the Tax Qualified and Non-Tax Qualified Trusts;
- those formerly owned by PECO Energy Company (Limerick 1 & 2, Salem 1 & 2, and Peach Bottom 1, 2 & 3) - the reports are consolidated for the Tax Qualified and Non-Tax Qualified Trusts; and
- those formerly owned by AmerGen Energy Company, LLC the reports are provided separately for each of the three units (TMI, Oyster Creek and Clinton) and the reports are consolidated for Tax Qualified and Non-Tax Qualified Trusts.
- the unit formerly owned by Entergy (Fitzpatrick) and the report is consolidated for Tax Qualified and Non-Tax Qualified Trusts.

In 2019, there were decommissioning expenses paid out of the Exelon units and only the legacy PECO unit (Peach Bottom 1) received rate payer contributions.

As the NRC approved, on 07/01/2019 Oyster Creek trust was transferred to a new owner. The Oyster Creek statements reflect this transfer and the 12/31/19 ending balance reflects residual proceeds that will be transferred to the new owner as they are received.

The FERC Jurisdictional allocation has been incorporated into our annual filing.

There has not been an opinion expressed on any of the attached reports by an independent public accountant, therefore none is enclosed.

If you have any questions, please contact me at (312) 394-3956.

Sincerely,

*Brian E. Andersen*

Brian E. Andersen  
Managing Director, Public Markets and NDT Investments

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# Clinton

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# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account number: FERGCL  
Account Name: CLINTON QING

## ◆ Change in Book and Market Value

Page 1 of 10

	Cost	Market value	For more information	Beginning Balance
Opening balance	450,444,381.11	543,164,531.29		
Interportfolio Transfers In	38,425,465.70	38,425,465.70	See funding & disbursement summary	
Security Receipts	34,099.13	43,928.55	See funding & disbursement summary	
Total receipts	38,459,564.83	38,469,394.25	See funding & disbursement summary	
Participant Withdrawals	- 152,837.69	- 152,837.69	See funding & disbursement summary	
Interportfolio Transfers Out	- 38,425,465.70	- 38,425,465.70	See funding & disbursement summary	
Security Deliveries	- 34,099.13	- 43,928.55	See funding & disbursement summary	
Total disbursements	- 38,612,402.52	- 38,622,231.94	See funding & disbursement summary	
Income received	11,286,210.51	11,286,210.51	See income & expense summary, cash activity detail	
Expenses paid	- 10,342,489.82	- 10,342,489.82	See income & expense summary	
<b>Expenses / Taxes</b>				
Unrealized gain/loss change	0.00	72,669,525.03	See asset summary	
Realized gain/loss	1,881,387.73	1,881,387.73	See realized gain/loss summary	
Accrued income change	- 3,673.62	- 3,673.62	See income & expense summary	
Total amortization expense	- 341,767.22	- 341,767.22	See fixed income amortization	
Total OID/MKT accretion income	752,234.92	752,234.92	See fixed income amortization	
Return of capital	- 43,547.71	- 43,547.71	See capital change detail	
Closing balance	453,479,898.21	618,869,573.42		Ending Balance

No rate payer contributions.

Northern Trust

Generated by Northern Trust from periodic data on 11 Feb 20

# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account number: FERGGL  
Account Name: CLINTON QING

## ◆ Change in Cash Value

Page 2 of 10

	Market value	Cost	For more information
Opening balance	9,590,353.11	9,590,768.64	
Interportfolio transfers in	38,425,465.70	38,425,465.70	See funding & disbursement summary
Total receipts	38,425,465.70	38,425,465.70	See funding & disbursement summary
Participant withdrawals	- 152,837.69	- 152,837.69	See funding & disbursement summary
Interportfolio transfers out	- 38,425,465.70	- 38,425,465.70	See funding & disbursement summary
Total disbursements	- 38,578,303.39	- 38,578,303.39	See funding & disbursement summary
Income received	11,281,089.03	11,281,089.03	See income & expense summary, cash activity detail
Expenses paid	- 10,342,489.82	- 10,342,489.82	See income & expense summary
Capital changes	4,997,433.59	4,997,433.59	See capital change detail
Foreign currency bought	7,913,427.67	7,913,427.67	See foreign exchange summary
Foreign currency sold	- 7,913,427.67	- 7,913,427.67	See foreign exchange summary
Realized gain/loss	- 15,237.87	- 15,237.87	See realized gain/loss summary
Unrealized gain/loss	2,423.76	0.00	See asset summary
Securities bought	- 88,926,624.38	- 88,926,624.38	See investment transaction summary
Securities sold	79,579,413.69	79,579,413.69	See investment transaction summary
Principal paydowns	1,410,502.32	1,410,502.32	See investment transaction summary
Intra portfolio transfer	0.00	0.00	
Closing balance	7,424,025.74	7,422,017.51	

### Purchases

### Sales

# Portfolio Statement

31 DEC 2019

Account Number FERGCL  
Account Name CLINTON QING

## Asset Summary

Page 9 of 10

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<i>All Other</i>								
<b>Recoverable taxes</b>								
Recoverable taxes	190,132.67	0.00	0.00	0.00	0.00	0.00	190,132.67	0.031%
<b>Total recoverable taxes</b>	<b>190,132.67</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>190,132.67</b>	<b>0.031%</b>
Total all other	190,132.67	0.00	0.00	0.00	0.00	0.00	190,132.67	0.031%
<b>Cash and Cash Equivalents</b>								
<b>Cash</b>								
Cash	- 97.39	229,065.92	227,057.69	0.00	2,008.23	2,008.23	228,968.53	0.037%
<b>Total cash</b>	<b>- 97.39</b>	<b>229,065.92</b>	<b>227,057.69</b>	<b>0.00</b>	<b>2,008.23</b>	<b>2,008.23</b>	<b>228,968.53</b>	<b>0.037%</b>
<b>Invested cash</b>								
Invested cash	1,358.25	1,232,043.93	1,232,043.93	0.00	0.00	0.00	1,233,402.18	0.199%
<b>Total invested cash</b>	<b>1,358.25</b>	<b>1,232,043.93</b>	<b>1,232,043.93</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,233,402.18</b>	<b>0.199%</b>
<b>Funds - short term investment</b>								
Funds - Short Term Investment	8,228.97	5,962,915.89	5,962,915.89	0.00	0.00	0.00	5,971,144.86	0.965%
<b>Total funds - short term investment</b>	<b>8,228.97</b>	<b>5,962,915.89</b>	<b>5,962,915.89</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>5,971,144.86</b>	<b>0.965%</b>
<b>Total cash and cash equivalents</b>	<b>9,489.83</b>	<b>7,424,025.74</b>	<b>7,422,017.51</b>	<b>0.00</b>	<b>2,008.23</b>	<b>2,008.23</b>	<b>7,433,515.57</b>	<b>1.201%</b>
<b>Adjustments To Cash</b>								
<b>Pending trade purchases Ending liability</b>								
Pending trade purchases	0.00	- 624,636.31	- 624,398.52	0.00	-237.79	- 237.79	-624,636.31	- 0.101%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 624,636.31</b>	<b>- 624,398.52</b>	<b>0.00</b>	<b>-237.79</b>	<b>- 237.79</b>	<b>-624,636.31</b>	<b>- 0.101%</b>
<b>Pending trade sales</b>								
Pending trade sales	0.00	631,047.82	630,831.91	0.00	215.91	215.91	631,047.82	0.102%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>631,047.82</b>	<b>630,831.91</b>	<b>0.00</b>	<b>215.91</b>	<b>215.91</b>	<b>631,047.82</b>	<b>0.102%</b>
<b>Total adjustments to cash</b>	<b>0.00</b>	<b>6,411.51</b>	<b>6,433.39</b>	<b>0.00</b>	<b>-21.88</b>	<b>- 21.88</b>	<b>6,411.51</b>	<b>0.001%</b>

Northern Trust

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# Portfolio Statement

31 DEC 2018

Account number FERCCL  
Account Name CLINTON QNQ

## Asset Summary

Page 9 of 9

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Cash and Cash Equivalents</b>								
<b>Cash</b>								
Cash	- 145.21	155,672.97	156,088.50	0.00	-415.53	- 415.53	155,527.76	0.029%
<b>Total cash</b>	<b>- 145.21</b>	<b>155,672.97</b>	<b>156,088.50</b>	<b>0.00</b>	<b>-415.53</b>	<b>- 415.53</b>	<b>155,527.76</b>	<b>0.029%</b>
<b>Invested cash</b>								
Invested cash	2,525.14	1,082,785.14	1,082,785.14	0.00	0.00	0.00	1,085,310.28	0.200%
<b>Total invested cash</b>	<b>2,525.14</b>	<b>1,082,785.14</b>	<b>1,082,785.14</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,085,310.28</b>	<b>0.200%</b>
<b>Funds - short term investment</b>								
Funds - Short Term Investment	16,405.79	8,351,895.00	8,351,895.00	0.00	0.00	0.00	8,368,300.79	1.541%
<b>Total funds - short term investment</b>	<b>16,405.79</b>	<b>8,351,895.00</b>	<b>8,351,895.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>8,368,300.79</b>	<b>1.541%</b>
<b>Total cash and cash equivalents</b>	<b>16,785.72</b>	<b>9,590,353.11</b>	<b>9,590,768.64</b>	<b>0.00</b>	<b>-415.53</b>	<b>- 415.53</b>	<b>9,609,138.83</b>	<b>1.769%</b>
<b>Adjustments To Cash</b>								
<b>Pending trade purchases Beginning liability</b>								
Pending trade purchases	0.00	- 360,587.54	- 360,587.54	0.00	0.00	0.00	-360,587.54	- 0.066%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 360,587.54</b>	<b>- 360,587.54</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-360,587.54</b>	<b>- 0.066%</b>
<b>Pending trade sales</b>								
Pending trade sales	0.00	345,672.66	345,672.66	0.00	0.00	0.00	345,672.66	0.064%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>345,672.66</b>	<b>345,672.66</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>345,672.66</b>	<b>0.064%</b>
<b>Total adjustments to cash</b>	<b>0.00</b>	<b>- 14,914.88</b>	<b>- 14,914.88</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-14,914.88</b>	<b>- 0.003%</b>
<b>Total Unrealized Gains</b>						<b>104,848,730.47</b>		
<b>Total Unrealized Losses</b>						<b>- 12,128,580.29</b>		
<b>Total</b>	<b>1,475,558.77</b>	<b>541,688,972.52</b>	<b>448,958,822.34</b>	<b>94,272,188.80</b>	<b>-1,562,038.62</b>	<b>92,720,160.18</b>	<b>543,164,531.29</b>	<b>100.000%</b>

Total Cost incl. Accruals

450,444,381.11

Northern Trust

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# Oyster Creek

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# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account Number: FERCOO  
Account Name: OYSTER CREEK QINQ

## ◆ Change in Book and Market Value

Page 1 of 4

	Cost	Market value	For more information	Beginning Balance
Opening balance	786,110,469.21	959,767,065.51		
Miscellaneous Cash Receipts	49,047,742.73	49,047,742.73	See funding & disbursement summary	
Interportfolio Transfers In	882,709,097.57	882,709,097.57	See funding & disbursement summary	
Security Receipts	918,939.28	1,195,013.54	See funding & disbursement summary	
Total receipts	932,675,779.58	932,951,853.84	See funding & disbursement summary	
Miscellaneous Cash Disbursements	- 854,923,455.09	- 854,923,455.09	See funding & disbursement summary	
Participant Withdrawals	- 115,372,391.04	- 115,372,391.04	See funding & disbursement summary	
Interportfolio Transfers Out	- 882,709,097.57	- 882,709,097.57	See funding & disbursement summary	
Security Deliveries	- 48,425,768.21	- 51,821,827.08	See funding & disbursement summary	
Total disbursements	- 1,901,430,711.91	- 1,904,826,770.78	See funding & disbursement summary	
Income received	9,946,758.25	9,946,758.25	See income & expense summary, cash activity detail	
Expenses paid	- 3,344,266.41	- 3,344,266.41	See income & expense summary	
Unrealized gain/loss change	0.00	- 173,656,594.71	See asset summary	
Unrealized gain/loss on security movements	0.00	3,119,984.61	See funding & disbursement summary	
Realized gain/loss	176,591,435.55	176,591,435.55	See realized gain/loss summary	
Accrued income change	- 943,154.20	- 943,154.20	See income & expense summary	
Total amortization expense	- 7,396.71	- 7,396.71	See fixed income amortization	
Total OID/MKT accretion income	520,390.58	520,390.58	See fixed income amortization	
Return of capital	- 1,022.15	- 1,022.15	See capital change detail	
Closing balance	118,281,779	118,283,38		Ending balance

Expenses/Taxes of \$27,167,760.41\*

No rate payer contributions.

\* 23,823,494.00 reported with Decommissioning Expenses but should be reflected in Expense/Taxes. Correct totals annotated above.

Northern Trust

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# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account Number: FERCOC  
Account Name: OYSTER CREEK QINQ

## ◆ Change in Cash Value

Page 2 of 4

	Market value	Cost	For more information
Opening balance	107,341,694.39	107,342,360.92	
Miscellaneous cash receipts	48,132,585.81	48,132,585.81	See funding & disbursement summary
Interportfolio transfers in	882,709,097.57	882,709,097.57	See funding & disbursement summary
Total receipts	930,841,683.38	930,841,683.38	See funding & disbursement summary
Miscellaneous cash disbursements	- 854,923,455.09	- 854,923,455.09	See funding & disbursement summary
Participant withdrawals	- 115,372,391.04	- 115,372,391.04	See funding & disbursement summary
Interportfolio transfers out	- 882,709,097.57	- 882,709,097.57	See funding & disbursement summary
Total disbursements	- 1,853,004,943.70	- 1,853,004,943.70	See funding & disbursement summary
Income received	9,946,758.25	9,946,758.25	See income & expense summary, cash activity detail
Expenses paid	- 3,344,266.41	- 3,344,266.41	See income & expense summary
Capital changes	403,603.73	403,603.73	See capital change detail
Foreign currency bought	84,810,197.61	84,810,197.61	See foreign exchange summary
Foreign currency sold	- 84,810,197.61	- 84,810,197.61	See foreign exchange summary
Realized gain/loss	85,899.69	85,899.69	See realized gain/loss summary
Unrealized gain/loss	688.12	0.00	See asset summary
Securities bought	- 118,154,252.07	- 118,154,252.07	See investment transaction summary
Securities sold	925,885,783.60	925,885,783.60	See investment transaction summary
Closing balance	2,648.98	2,647.39	

## Purchases

## Sales

Northern Trust

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# Portfolio Statement

31 DEC 2019

Account number FERCOG  
Account Name OYSTER CREEK QNIQ

## ◆ Asset Summary

Page 4 of 4

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<i>Cash and Cash Equivalents</i>								
<i>Funds - short term investment</i>								
Funds - Short Term Investment	0.00	0.45	0.45	0.00	0.00	0.00	0.45	0.000%
<b>Total funds - short term investment</b>	<b>0.00</b>	<b>0.45</b>	<b>0.45</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.45</b>	<b>0.000%</b>
Total cash and cash equivalents	422.91	2,648.98	2,647.39	0.00	1.59	1.59	3,071.89	2.697%
Total Unrealized Gains					1.59	1.59		
Total Unrealized Losses						0.00		
<b>Total</b>	<b>115,634.40</b>	<b>2,648.98</b>	<b>2,647.39</b>	<b>0.00</b>	<b>1.59</b>	<b>1.59</b>	<b>118,283.38</b>	<b>100.000%</b>

Total Cost incl. Accruals

118,281.79

# Portfolio Statement

31 DEC 2018

Account Name OYSTER CREEK QINQ  
Account number FERCOQ

## Asset Summary

Page 8 of 9

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Cash and Cash Equivalents</b>								
<b>Short term bills and notes</b>								
United States - USD	0.00	7,052,316.05	7,008,002.57	44,313.48	0.00	44,313.48	7,052,316.05	0.7359%
<b>Total short term bills and notes</b>	<b>0.00</b>	<b>7,052,316.05</b>	<b>7,008,002.57</b>	<b>44,313.48</b>	<b>0.00</b>	<b>44,313.48</b>	<b>7,052,316.05</b>	<b>0.7359%</b>
<b>Currency</b>								
Currency	0.00	991.78	991.78	0.00	0.00	0.00	991.78	0.0000%
<b>Total currency</b>	<b>0.00</b>	<b>991.78</b>	<b>991.78</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>991.78</b>	<b>0.0000%</b>
<b>Cash</b>								
Cash	7.14	118,516.94	119,203.47	0.00	-686.53	- 686.53	118,524.08	0.012%
<b>Total cash</b>	<b>7.14</b>	<b>118,516.94</b>	<b>119,203.47</b>	<b>0.00</b>	<b>-686.53</b>	<b>- 686.53</b>	<b>118,524.08</b>	<b>0.012%</b>
<b>Invested cash</b>								
Invested cash	507.29	261,117.85	261,117.85	0.00	0.00	0.00	261,625.14	0.027%
<b>Total invested cash</b>	<b>507.29</b>	<b>261,117.85</b>	<b>261,117.85</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>261,625.14</b>	<b>0.027%</b>
<b>Funds - short term investment</b>								
Funds - Short Term Investment	180,623.03	106,961,067.82	106,961,067.82	0.00	0.00	0.00	107,141,690.85	11.163%
<b>Total funds - short term investment</b>	<b>180,623.03</b>	<b>106,961,067.82</b>	<b>106,961,067.82</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>107,141,690.85</b>	<b>11.163%</b>
<b>Total cash and cash equivalents</b>	<b>181,137.46</b>	<b>114,394,010.44</b>	<b>114,350,383.49</b>	<b>44,313.48</b>	<b>-686.53</b>	<b>43,626.95</b>	<b>114,575,147.90</b>	<b>11.938%</b>
<b>Adjustments To Cash</b>								
<b>Pending trade purchases</b>								
Pending trade purchases	0.00	- 30,160.23	- 30,119.34	0.00	-40.89	- 40.89	-30,160.23	- 0.003%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 30,160.23</b>	<b>- 30,119.34</b>	<b>0.00</b>	<b>-40.89</b>	<b>- 40.89</b>	<b>-30,160.23</b>	<b>- 0.003%</b>
<b>Pending trade sales</b>								
Pending trade sales	0.00	905,606.89	905,606.89	0.00	0.00	0.00	905,606.89	0.094%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>905,606.89</b>	<b>905,606.89</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>905,606.89</b>	<b>0.094%</b>

**TMI**

# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account number FEROTM  
Account Name THREE MILE ISLAND QUNQ

## ◆ Change in Book and Market Value

Page 1 of 8

	Cost	Market value	For more information	Beginning balance
Opening balance	576,768,681.64	669,617,224.64		
Miscellaneous Cash Receipts	1,009.54	1,009.54	See funding & disbursement summary	
Interportfolio Transfers In	411,901,126.83	411,901,126.83	See funding & disbursement summary	
Security Receipts	67,919.67	91,808.03	See funding & disbursement summary	
Total receipts	411,970,056.04	411,993,944.40	See funding & disbursement summary	
Miscellaneous Cash Disbursements	- 1,037.71	- 1,037.71	See funding & disbursement summary	
Participant Withdrawals	- 8,604,847.18	- 8,604,847.18	See funding & disbursement summary	
Interportfolio Transfers Out	- 411,901,126.83	- 411,901,126.83	See funding & disbursement summary	
Security Deliveries	- 67,919.67	- 91,808.03	See funding & disbursement summary	
Total disbursements	- 420,574,931.39	- 420,598,819.75	See funding & disbursement summary	
Income received	13,915,069.79	13,915,069.79	See income & expense summary, cash activity detail	
Expenses paid	- 7,508,038.42	- 7,508,038.42	See income & expense summary	
Unrealized gain/loss change	0.00	61,423,095.58	See asset summary	
Realized gain/loss	18,947,616.70	18,947,616.70	See realized gain/loss summary	
Accrued income change	- 683,163.47	- 683,163.47	See income & expense summary	
Total amortization expense	- 175,601.71	- 175,601.71	See fixed income amortization	
Total OID/AMKT accretion income	3,871,001.41	3,871,001.41	See fixed income amortization	
Return of capital	- 479.01	- 479.01	See capital change detail	
Closing balance	596,530,211.58	750,801,850.16		Ending balance

No rate payer contributions.

Northern Trust

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# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account Number FERCTM  
Account Name THREE MILE ISLAND Q/NQ

## ◆ Change in Cash Value

Page 2 of 8

	Market value	Cost	For more information
Opening balance	11,760,745.53	11,761,437.33	
Miscellaneous cash receipts	1,009.54	1,009.54	See funding & disbursement summary
Interportfolio transfers in	411,901,126.83	411,901,126.83	See funding & disbursement summary
Total receipts	411,902,136.37	411,902,136.37	See funding & disbursement summary
Miscellaneous cash disbursements	- 1,037.71	- 1,037.71	See funding & disbursement summary
Participant withdrawals	- 8,604,847.18	- 8,604,847.18	See funding & disbursement summary
Interportfolio transfers out	- 411,901,126.83	- 411,901,126.83	See funding & disbursement summary
Total disbursements	- 420,507,011.72	- 420,507,011.72	See funding & disbursement summary
Income received	13,908,665.86	13,908,665.86	See income & expense summary, cash activity detail
Expenses paid	- 7,508,038.42	- 7,508,038.42	See income & expense summary
Capital changes	4,381,577.85	4,381,577.85	See capital change detail
Foreign currency bought	4,487,076.21	4,487,076.21	See foreign exchange summary
Foreign currency sold	- 4,487,076.21	- 4,487,076.21	See foreign exchange summary
Realized gain/loss	- 25,181.54	- 25,181.54	See realized gain/loss summary
Unrealized gain/loss	4,891.08	0.00	See asset summary
Securities bought	- 383,517,056.37	- 383,517,056.37	See investment transaction summary
Securities sold	428,826,819.64	428,826,819.64	See investment transaction summary
Closing balance	59,227,548.28	59,223,349.00	

# Portfolio Statement

31 DEC 2019

Account Name: **THREE MILE ISLAND QUNQ**  
 Account Number: **FERCTM**

## ◆ Asset Summary

Page 8 of 8

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Adjustments To Cash</b>								
<b>Pending foreign exchange purchases</b>								
	0.00	3,718.44	3,697.68	0.00	20.76	20.76	3,718.44	0.0000%
<b>Total pending foreign exchange purchases</b>	<b>0.00</b>	<b>3,718.44</b>	<b>3,697.68</b>	<b>0.00</b>	<b>20.76</b>	<b>20.76</b>	<b>3,718.44</b>	<b>0.0000%</b>
<b>Pending foreign exchange sales</b>								
	0.00	- 3,746.04	- 3,697.68	0.00	-48.36	- 48.36	-3,746.04	- 0.0000%
<b>Total pending foreign exchange sales</b>	<b>0.00</b>	<b>- 3,746.04</b>	<b>- 3,697.68</b>	<b>0.00</b>	<b>-48.36</b>	<b>- 48.36</b>	<b>-3,746.04</b>	<b>- 0.0000%</b>
<b>Pending trade purchases</b>								
	0.00	- 28,495.73	- 28,202.43	0.00	-293.30	- 293.30	-28,495.73	- 0.004%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 28,495.73</b>	<b>- 28,202.43</b>	<b>0.00</b>	<b>-293.30</b>	<b>- 293.30</b>	<b>-28,495.73</b>	<b>- 0.004%</b>
<b>Pending trade sales</b>								
	0.00	16,232.38	16,073.74	0.00	158.64	158.64	16,232.38	0.002%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>16,232.38</b>	<b>16,073.74</b>	<b>0.00</b>	<b>158.64</b>	<b>158.64</b>	<b>16,232.38</b>	<b>0.002%</b>
<b>Total adjustments to cash</b>	<b>0.00</b>	<b>- 12,290.95</b>	<b>- 12,128.69</b>	<b>0.00</b>	<b>-162.26</b>	<b>- 162.26</b>	<b>-12,290.95</b>	<b>- 0.002%</b>
<b>Total Unrealized Gains</b>					<b>160,946,543.97</b>			
<b>Total Unrealized Losses</b>					<b>- 6,674,906.39</b>			
<b>Total</b>	<b>906,934.83</b>	<b>749,895,915.33</b>	<b>696,624,276.75</b>	<b>156,046,262.98</b>	<b>-1,774,624.40</b>	<b>154,271,637.58</b>	<b>760,801,860.16</b>	<b>100.0000%</b>

**Total Cost incl. Accruals**

596,530,211.58

**Northern Trust**

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# Portfolio Statement

31 DEC 2018

Account Name THREE MILE ISLAND QINQ

Account number FERCTM

## ◆ Asset Summary

Page 9 of 9

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<i>Adjustments To Cash</i>								
<b>Pending trade purchases Beginning liability</b>								
Pending trade purchases	0.00	- 1,259,584.92	- 1,259,178.19	0.00	-406.73	- 406.73	-1,259,584.92	- 0.188%
Total pending trade purchases	0.00	- 1,259,584.92	- 1,259,178.19	0.00	-406.73	- 406.73	-1,259,584.92	- 0.188%
<b>Pending trade sales</b>								
Pending trade sales	0.00	1,216,141.55	1,216,141.55	0.00	0.00	0.00	1,216,141.55	0.182%
Total pending trade sales	0.00	1,216,141.55	1,216,141.55	0.00	0.00	0.00	1,216,141.55	0.182%
Total adjustments to cash	0.00	- 43,443.37	- 43,036.64	0.00	-406.73	- 406.73	-43,443.37	- 0.006%
Total Unrealized Gains						107,488,804.20		
Total Unrealized Losses						- 14,640,261.20		
<b>Total</b>	<b>1,589,098.30</b>	<b>668,028,126.34</b>	<b>575,179,683.34</b>	<b>96,034,819.69</b>	<b>-2,186,276.98</b>	<b>92,848,543.00</b>	<b>669,617,224.64</b>	<b>100.000%</b>

Total Cost incl. Accruals

576,768,681.64

Northern Trust

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# Legacy PECO

# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account number FERCPE  
Account Name FERC PE00

## ◆ Change in Book and Market Value

Page 1 of 10

	Cost	Market value	For more information	Beginning balance
Opening balance	1,761,176,386.28	2,068,437,066.44		
Sponsor Contributions	3,859,745.04	3,859,745.04	See funding & disbursement summary	
Interportfolio Transfers In	310,324,583.28	310,324,583.28	See funding & disbursement summary	
Security Receipts	0.00	0.00	See funding & disbursement summary	
Total receipts	314,184,328.32	314,184,328.32	See funding & disbursement summary	
Participant Withdrawals	- 119,654.42	- 119,654.42	See funding & disbursement summary	
Interportfolio Transfers Out	- 310,324,583.28	- 310,324,583.28	See funding & disbursement summary	
Total disbursements	- 310,444,237.70	- 310,444,237.70	See funding & disbursement summary	
Income received	44,696,933.96	44,696,933.96	See income & expense summary, Cash activity detail	
Expenses paid	- 20,257,780.31	- 20,257,780.31	See income & expense summary	
Unrealized gain/loss change	0.00	258,983,020.14	See asset summary	
Realized gain/loss	18,405,010.96	18,405,010.96	See realized gain/loss summary	
Accrued income change	- 442,136.03	- 442,136.03	See income & expense summary	
Total amortization expense	- 1,483,394.14	- 1,483,394.14	See fixed income amortization	
Total OID/MKT accretion income	2,499,889.42	2,499,889.42	See fixed income amortization	
Return of capital	- 45.80	- 45.80	See capital change detail	
Closing balance	1,808,334,954.98	2,374,578,655.28		Ending balance

Northern Trust

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# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account number FERCPE  
Account Name FERC PECO

## ◆ Change in Cash Value

Page 2 of 10

	Market value	Cost	For more information
Opening balance	20,659,844.92	20,657,998.34	
Sponsor contributions	3,859,745.04	3,859,745.04	See funding & disbursement summary
Interportfolio transfers in	310,324,583.28	310,324,583.28	See funding & disbursement summary
Total receipts	314,184,328.32	314,184,328.32	See funding & disbursement summary
Participant withdrawals	- 119,654.42	- 119,654.42	See funding & disbursement summary
Interportfolio transfers out	- 310,324,583.28	- 310,324,583.28	See funding & disbursement summary
Total disbursements	- 310,444,237.70	- 310,444,237.70	See funding & disbursement summary
Income received	44,660,879.36	44,660,879.36	See income & expense summary, cash activity detail
Expenses paid	- 20,257,780.31	- 20,257,780.31	See income & expense summary
Capital changes	17,001,344.70	17,001,344.70	See capital change detail
Foreign currency bought	9,173,005.95	9,173,005.95	See foreign exchange summary
Foreign currency sold	- 9,173,005.95	- 9,173,005.95	See foreign exchange summary
Realized gain/loss	- 34,116.81	- 34,116.81	See realized gain/loss summary
Unrealized gain/loss	7,501.78	0.00	See asset summary
Securities bought	- 522,473,290.87	- 522,473,290.87	See investment transaction summary
Securities sold	524,140,376.50	524,140,376.50	See investment transaction summary
Principal paydowns	167,767.20	167,767.20	See investment transaction summary
Intra portfolio transfer	0.00	0.00	
Closing balance	67,612,617.09	67,603,268.73	

Northern Trust

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# Portfolio Statement

31 DEC 2019

Account number FERCPPE  
Account Name FERC PECO

## ◆ Asset Summary

Page 10 of 10

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Adjustments To Cash</b>								
<b>Pending foreign exchange purchases</b>								
Pending foreign exchange purchases	0.00	12,449.99	12,357.76	0.00	92.23	92.23	12,449.99	0.001%
<b>Total pending foreign exchange purchases</b>	<b>0.00</b>	<b>12,449.99</b>	<b>12,357.76</b>	<b>0.00</b>	<b>92.23</b>	<b>92.23</b>	<b>12,449.99</b>	<b>0.001%</b>
<b>Pending foreign exchange sales</b>								
Pending foreign exchange sales	0.00	- 12,475.07	- 12,357.76	0.00	-117.31	- 117.31	-12,475.07	- 0.001%
<b>Total pending foreign exchange sales</b>	<b>0.00</b>	<b>- 12,475.07</b>	<b>- 12,357.76</b>	<b>0.00</b>	<b>-117.31</b>	<b>- 117.31</b>	<b>-12,475.07</b>	<b>- 0.001%</b>
<b>Pending trade purchases</b>								
<b>Ending liability</b>								
Pending trade purchases	0.00	- 5,130,981.85	- 5,129,804.39	0.00	-1,177.46	- 1,177.46	-5,130,981.85	- 0.216%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 5,130,981.85</b>	<b>- 5,129,804.39</b>	<b>0.00</b>	<b>-1,177.46</b>	<b>- 1,177.46</b>	<b>-5,130,981.85</b>	<b>- 0.216%</b>
<b>Pending trade sales</b>								
Pending trade sales	0.00	3,921,202.78	3,920,373.78	0.00	829.00	829.00	3,921,202.78	0.165%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>3,921,202.78</b>	<b>3,920,373.78</b>	<b>0.00</b>	<b>829.00</b>	<b>829.00</b>	<b>3,921,202.78</b>	<b>0.165%</b>
<b>Total adjustments to cash</b>	<b>0.00</b>	<b>- 1,209,804.15</b>	<b>- 1,209,430.61</b>	<b>0.00</b>	<b>-373.54</b>	<b>- 373.54</b>	<b>-1,209,804.15</b>	<b>- 0.061%</b>
<b>Total Unrealized Gains</b>						<b>584,643,046.89</b>		
<b>Total Unrealized Losses</b>						<b>- 18,399,346.59</b>		
<b>Total</b>	<b>3,946,266.41</b>	<b>2,370,630,388.87</b>	<b>1,804,385,698.57</b>	<b>566,067,807.38</b>	<b>175,892.92</b>	<b>566,243,700.30</b>	<b>2,374,678,666.28</b>	<b>100.000%</b>
<b>Total Cost Incl. Accruals</b>			<b>1,808,334,954.98</b>					

**Portfolio Statement**

31 DEC 2018

Account number FERCPE  
Account Name FERC PEEO

◆ **Asset Summary**

Page 9 of 9

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Adjustments To Cash</b>								
<b>Pending trade purchases Beginning liability</b>								
Pending trade purchases	0.00	- 3,387,499.01	- 3,387,457.37	0.00	-41.64	- 41.64	-3,387,499.01	- 0.164%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 3,387,499.01</b>	<b>- 3,387,457.37</b>	<b>0.00</b>	<b>-41.64</b>	<b>- 41.64</b>	<b>-3,387,499.01</b>	<b>- 0.164%</b>
<b>Pending trade sales</b>								
Pending trade sales	0.00	2,009,519.23	2,009,459.37	0.00	59.86	59.86	2,009,519.23	0.097%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>2,009,519.23</b>	<b>2,009,459.37</b>	<b>0.00</b>	<b>59.86</b>	<b>59.86</b>	<b>2,009,519.23</b>	<b>0.097%</b>
<b>Total adjustments to cash</b>	<b>0.00</b>	<b>- 1,377,979.78</b>	<b>- 1,377,998.00</b>	<b>0.00</b>	<b>18.22</b>	<b>18.22</b>	<b>-1,377,979.78</b>	<b>- 0.067%</b>
<b>Total Unrealized Gains</b>						<b>343,478,454.30</b>		
<b>Total Unrealized Losses</b>						<b>- 36,217,774.14</b>		
<b>Total</b>	<b>4,390,392.44</b>	<b>2,064,046,674.00</b>	<b>1,766,785,993.84</b>	<b>307,361,751.52</b>	<b>-101,071.36</b>	<b>307,260,680.16</b>	<b>2,068,437,066.44</b>	<b>100.000%</b>

**Total Cost incl. Accruals**

**1,761,176,386.28**

**Northern Trust**

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# Legacy ComEd

# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account Name EXELON NUC ALL MANAGERS

Account number EXLNTN

## ◆ Change in Book and Market Value

Page 1 of 19

	Cost	Market value	For more information	Beginning balance
Opening balance	4,320,488,013.41	5,266,013,411.15		
Miscellaneous Cash Receipts	708,532,101.00	708,532,101.00	See funding & disbursement summary	
Interportfolio Transfers In	828,752,865.17	828,752,865.17	See funding & disbursement summary	
Security Receipts	1,839,744.66	159,867.52	See funding & disbursement summary	
Total receipts	1,539,124,710.83	1,537,444,833.69	See funding & disbursement summary	
Miscellaneous Cash Disbursements	- 708,532,100.99	- 708,532,100.99	See funding & disbursement summary	
Participant Withdrawals	- 516,152.67	- 516,152.67	See funding & disbursement summary	
Interportfolio Transfers Out	- 828,752,865.17	- 828,752,865.17	See funding & disbursement summary	
Security Deliveries	- 1,839,744.66	- 159,867.52	See funding & disbursement summary	
Total disbursements	- 1,539,640,863.49	- 1,537,960,986.35	See funding & disbursement summary	
Income received	116,093,322.91	116,093,322.91	See income & expense summary, cash activity detail	
Expenses paid	- 56,165,398.78	- 56,165,398.78	See income & expense summary	
Unrealized gain/loss change	0.00	653,685,922.79	See asset summary	
Realized gain/loss	56,851,238.91	56,851,238.91	See realized gain/loss summary	
Accrued income change	- 1,785,143.79	- 1,785,143.79	See income & expense summary	
Total amortization expense	- 6,383,375.72	- 6,383,375.72	See fixed income amortization	
Total OID/AMKT accretion income	328,140.03	328,140.03	See fixed income amortization	
Return of capital	- 34,441.91	- 34,441.91	See capital change detail	
Wash Sale Cost Adjustments	17.73	17.73	See investment transaction detail	
Wash Sale Adjustment Reclassification	- 17.73	- 17.73	See investment transaction detail	
Closing balance	4,428,876,202.40	6,029,087,522.93		Ending balance

No rate payer contribution.

Northern Trust

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# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account Name EXELON NUC ALL MANAGERS  
Account number EXLNTN

## ◆ Change in Cash Value

Page 2 of 19

	Market value	Cost	For more information
Opening balance	39,632,823.26	39,632,823.35	
Miscellaneous cash receipts	708,532,101.00	708,532,101.00	See funding & disbursement summary
Interportfolio transfers in	828,752,865.17	828,752,865.17	See funding & disbursement summary
Total receipts	1,537,284,966.17	1,537,284,966.17	See funding & disbursement summary
Miscellaneous cash disbursements	- 708,532,100.99	- 708,532,100.99	See funding & disbursement summary
Participant withdrawals	- 516,152.67	- 516,152.67	See funding & disbursement summary
Interportfolio transfers out	- 828,752,865.17	- 828,752,865.17	See funding & disbursement summary
Total disbursements	- 1,537,801,118.83	- 1,537,801,118.83	See funding & disbursement summary
Income received	115,992,879.14	115,992,879.14	See income & expense summary, cash activity detail
Expenses paid	- 56,165,398.78	- 56,165,398.78	See income & expense summary
Capital changes	53,904,700.44	53,904,700.44	See capital change detail
Foreign currency bought	1,578,235,743.12	1,578,235,743.12	See foreign exchange summary
Foreign currency sold	- 1,578,235,743.12	- 1,578,235,743.12	See foreign exchange summary
Realized gain/loss	1,748,136.10	1,748,136.10	See realized gain/loss summary
Mark-to-markets	154,450.46	154,450.46	See realized gain/loss summary
Unrealized gain/loss	26,058.25	0.00	See asset summary
Securities bought	- 5,723,212,184.65	- 5,723,212,184.65	See investment transaction summary
Securities sold	5,751,733,753.03	5,751,733,753.03	See investment transaction summary
Principal paydowns	12,751,413.10	12,751,413.10	See investment transaction summary
Intra portfolio transfer	0.00	0.00	
Closing balance	196,034,267.69	196,024,419.53	

Northern Trust

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# Portfolio Statement

31 DEC 2019

Account Name EXELON NUC ALL MANAGERS

Account number EXLNTN

## Asset Summary

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Country	Market value	Cost	Market	Unrealized gain/loss	Total	Market value incl. accruals	%
	Accrued income/expense			Translation			
<b>Liabilities</b>							
<b>Swap liabilities</b>							
China - CNY	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%
China - USD	0.00	- 3,728.99	1,295.12	0.00	1,295.12	-2,433.87	- 0.0000%
Colombia - USD	0.00	- 2,177.35	2,177.35	0.00	2,177.35	0.00	0.0000%
European Union - EUR	0.00	- 13,970.62	- 344,699.81	168.59	- 344,531.22	-358,501.84	- 0.0006%
Hong Kong - USD	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%
Indonesia - USD	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%
Italy - USD	0.00	- 37,712.23	37,712.23	0.00	37,712.23	0.00	0.0000%
Mexico - MXN	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%
Mexico - USD	0.00	- 146,610.63	146,610.63	0.00	146,610.63	0.00	0.0000%
United Kingdom - EUR	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%
United Kingdom - GBP	0.00	- 202,350.50	15,062.92	-8,544.09	6,518.83	-195,831.67	- 0.0003%
United States - USD	0.00	- 275,649.38	- 25,492.72	0.00	- 25,492.72	-275,649.38	- 0.0005%
<b>Total swap liabilities</b>	<b>0.00</b>	<b>- 832,416.76</b>	<b>- 167,334.28</b>	<b>-8,375.60</b>	<b>- 175,709.78</b>	<b>-832,416.76</b>	<b>- 0.014%</b>
<b>Obligation to return cash collateral hld</b>							
United States - USD	0.00	- 390,000.00	0.00	0.00	0.00	-390,000.00	- 0.0066%
<b>Total obligation to return cash collateral hld</b>	<b>0.00</b>	<b>- 390,000.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-390,000.00</b>	<b>- 0.006%</b>
<b>Exchange cleared swap liabilities</b>							
Brazil - BRL	0.00	- 4,162.09	- 1,801.40	-41.98	- 1,843.38	-4,162.09	- 0.0000%
Canada - CAD	0.00	- 11,164.51	- 6,746.59	-24.73	- 8,771.32	-11,164.51	- 0.0000%
Canada - USD	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%
Chile - CLP	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%
European Union - EUR	0.00	- 576,380.64	- 253,135.47	16,210.80	- 236,924.67	-576,380.64	- 0.010%
Hungary - HUF	0.00	0.00	0.00	0.00	0.00	0.00	0.0000%

Northern Trust

Generated by Northern Trust from periodic data on 25 Feb 20

# Portfolio Statement

31 DEC 2019

Account Name EXELON NUC ALL MANAGERS  
Account number EXLNTN

## Asset Summary

Page 17 of 19

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Liabilities</b>								
<b>Ending</b>								
<b>Exchange cleared swap liabilities</b>								
Japan - JPY	0.00	- 160,287.01	- 21,372.96	- 138,751.90	-162.15	- 138,914.05	-160,287.01	- 0.003%
Mexico - MXN	0.00	0.00	- 658.63	660.38	-1.75	658.63	0.00	0.000%
New Zealand - NZD	0.00	- 97,812.10	0.00	- 97,812.10	0.00	- 97,812.10	-97,812.10	- 0.002%
United Kingdom - EUR	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000%
United Kingdom - GBP	0.00	- 355,268.17	- 30,288.46	- 324,758.43	-221.28	- 324,979.71	-355,268.17	- 0.006%
United States - USD	0.00	- 1,832,668.79	- 449,297.93	- 1,383,370.86	0.00	- 1,383,370.86	-1,832,668.79	- 0.030%
<b>Total exchange cleared swap liabilities</b>	<b>0.00</b>	<b>- 3,037,743.31</b>	<b>- 846,786.85</b>	<b>- 2,207,716.37</b>	<b>15,758.91</b>	<b>- 2,191,957.46</b>	<b>-3,037,743.31</b>	<b>- 0.060%</b>
<b>Total liabilities</b>	<b>0.00</b>	<b>- 4,260,160.07</b>	<b>- 1,892,492.83</b>	<b>- 2,375,060.66</b>	<b>7,383.41</b>	<b>- 2,367,667.24</b>	<b>-4,260,160.07</b>	<b>- 0.071%</b>
<b>All Other</b>								
<b>Recoverable taxes</b>								
Recoverable taxes	221,664.07	0.00	0.00	0.00	0.00	0.00	221,664.07	0.004%
<b>Total recoverable taxes</b>	<b>221,664.07</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>221,664.07</b>	<b>0.004%</b>
<b>Total all other</b>	<b>221,664.07</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>221,664.07</b>	<b>0.004%</b>
<b>Cash and Cash Equivalents</b>								
<b>Repurchase agreements</b>								
United States - USD	- 216,580.81	- 90,437,050.00	- 90,437,050.00	0.00	0.00	0.00	-90,653,630.81	- 1.504%
<b>Total repurchase agreements</b>	<b>- 216,580.81</b>	<b>- 90,437,050.00</b>	<b>- 90,437,050.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-90,653,630.81</b>	<b>- 1.504%</b>
<b>Cash</b>								
Cash	- 230.92	3,451,964.45	3,448,694.38	0.00	3,270.07	3,270.07	3,451,733.53	0.057%
<b>Total cash</b>	<b>- 230.92</b>	<b>3,451,964.45</b>	<b>3,448,694.38</b>	<b>0.00</b>	<b>3,270.07</b>	<b>3,270.07</b>	<b>3,451,733.53</b>	<b>0.057%</b>
<b>Invested cash</b>								
Invested cash	1,808.02	1,576,608.16	1,576,608.16	0.00	0.00	0.00	1,578,416.18	0.026%
<b>Total invested cash</b>	<b>1,808.02</b>	<b>1,576,608.16</b>	<b>1,576,608.16</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,578,416.18</b>	<b>0.026%</b>

Northern Trust

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# Portfolio Statement

31 DEC 2019

Account Name EXELON NUC ALL MANAGERS  
Account number EXLNTN

## ◆ Asset Summary

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Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Cash and Cash Equivalents</b>								
<b>Cash (externally held)</b>								
	0.00	1,613,000.00	1,613,000.00	0.00	0.00	0.00	1,613,000.00	0.027%
<b>Total cash (externally held)</b>	<b>0.00</b>	<b>1,613,000.00</b>	<b>1,613,000.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1,613,000.00</b>	<b>0.027%</b>
<b>Funds - short term investment</b>								
Funds - Short Term Investment	258,761.53	190,175,158.79	190,175,158.79	0.00	0.00	0.00	190,433,920.32	3.159%
United States - USD	0.00	6,322,840.58	6,323,261.42	- 420.84	0.00	- 420.84	6,322,840.58	0.103%
<b>Total funds - short term investment</b>	<b>258,761.53</b>	<b>196,497,999.37</b>	<b>196,498,420.21</b>	<b>- 420.84</b>	<b>0.00</b>	<b>- 420.84</b>	<b>196,756,760.90</b>	<b>3.264%</b>
<b>Variation margin</b>								
Variation Margin	0.00	274,894.74	272,797.06	0.00	2,097.68	2,097.68	274,894.74	0.005%
<b>Total variation margin</b>	<b>0.00</b>	<b>274,894.74</b>	<b>272,797.06</b>	<b>0.00</b>	<b>2,097.68</b>	<b>2,097.68</b>	<b>274,894.74</b>	<b>0.006%</b>
<b>Cash collateral due to/from ccp broker</b>								
Cash Collateral Due to/from CCP Broker	0.00	- 1,057,358.45	- 1,061,838.86	0.00	4,480.41	4,480.41	- 1,057,358.45	- 0.018%
<b>Total cash collateral due to/from ccp broker</b>	<b>0.00</b>	<b>- 1,057,358.45</b>	<b>- 1,061,838.86</b>	<b>0.00</b>	<b>4,480.41</b>	<b>4,480.41</b>	<b>- 1,057,358.45</b>	<b>- 0.018%</b>
<b>Total cash and cash equivalents</b>	<b>43,757.82</b>	<b>111,920,068.27</b>	<b>111,910,630.95</b>	<b>- 420.84</b>	<b>9,848.16</b>	<b>9,427.32</b>	<b>111,963,816.09</b>	<b>1.887%</b>
<b>Adjustments To Cash</b>								
<b>Pending foreign exchange purchases</b>								
Pending foreign exchange purchases	0.00	98,957,484.59	98,348,446.16	0.00	609,038.43	609,038.43	98,957,484.59	1.642%
<b>Total pending foreign exchange purchases</b>	<b>0.00</b>	<b>98,957,484.59</b>	<b>98,348,446.16</b>	<b>0.00</b>	<b>609,038.43</b>	<b>609,038.43</b>	<b>98,957,484.59</b>	<b>1.642%</b>
<b>Pending foreign exchange sales</b>								
Pending foreign exchange sales	0.00	- 99,368,016.53	- 98,348,446.16	0.00	- 1,019,570.37	- 1,019,570.37	- 99,368,016.53	- 1.648%
<b>Total pending foreign exchange sales</b>	<b>0.00</b>	<b>- 99,368,016.53</b>	<b>- 98,348,446.16</b>	<b>0.00</b>	<b>- 1,019,570.37</b>	<b>- 1,019,570.37</b>	<b>- 99,368,016.53</b>	<b>- 1.648%</b>
<b>Pending trade purchases</b>								
Pending trade purchases	0.00	- 228,904,807.98	- 228,901,566.63	0.00	- 3,221.35	- 3,221.35	- 228,904,807.98	- 3.797%

Northern Trust

Generated by Northern Trust from periodic data on 25 Feb 20

# Portfolio Statement

31 DEC 2018

Account Name EXELON NUC ALL MANAGERS

Account number EXLNTN

## Asset Summary

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Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Hedge Fund</b>								
<b>Hedge equity</b>								
United States - USD	0.00	377,046,268.28	329,743,917.60	47,302,350.68	0.00	47,302,350.68	377,046,268.28	7.160%
<b>Total hedge equity</b>	<b>0.00</b>	<b>377,046,268.28</b>	<b>329,743,917.60</b>	<b>47,302,350.68</b>	<b>0.00</b>	<b>47,302,350.68</b>	<b>377,046,268.28</b>	<b>7.160%</b>
<b>Total hedge fund</b>	<b>0.00</b>	<b>377,046,268.28</b>	<b>329,743,917.60</b>	<b>47,302,350.68</b>	<b>0.00</b>	<b>47,302,350.68</b>	<b>377,046,268.28</b>	<b>7.160%</b>
<b>Liabilities</b>								
<b>Beginning</b>								
<b>Swap liabilities</b>								
European Union - EUR	0.00	- 261,422.47	- 26,651.26	- 233,950.93	-820.28	- 234,771.21	-261,422.47	- 0.005%
Mexico - MXN	0.00	- 4,569.30	0.00	- 4,569.30	0.00	- 4,569.30	-4,569.30	- 0.000%
United Kingdom - GBP	0.00	- 320,422.42	- 232,406.30	- 87,420.06	-596.06	- 88,016.12	-320,422.42	- 0.006%
United States - USD	0.00	- 668,366.72	- 621,646.11	- 46,720.61	0.00	- 46,720.61	-668,366.72	- 0.013%
<b>Total swap liabilities</b>	<b>0.00</b>	<b>- 1,254,780.91</b>	<b>- 880,703.67</b>	<b>- 372,660.90</b>	<b>-1,416.34</b>	<b>- 374,077.24</b>	<b>-1,254,780.91</b>	<b>- 0.024%</b>
<b>Obligation to return cash collateral hld</b>								
United States - USD	0.00	- 1,550,000.00	- 1,550,000.00	0.00	0.00	0.00	-1,550,000.00	- 0.029%
<b>Total obligation to return cash collateral hld</b>	<b>0.00</b>	<b>- 1,550,000.00</b>	<b>- 1,550,000.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-1,550,000.00</b>	<b>- 0.029%</b>
<b>Exchange cleared swap liabilities</b>								
Australia - AUD	0.00	- 150,058.39	- 470,874.46	202,821.79	117,994.28	320,816.07	-150,058.39	- 0.003%
European Union - EUR	0.00	- 321,119.33	- 275,580.16	- 57,471.63	11,932.46	- 45,539.17	-321,119.33	- 0.006%
Hungary - HUF	0.00	- 16,716.75	0.00	- 16,716.75	0.00	- 16,716.75	-16,716.75	- 0.000%
Japan - JPY	0.00	- 364,356.97	- 96,150.92	- 266,877.98	-1,328.07	- 268,206.05	-364,356.97	- 0.007%

# Portfolio Statement

31 DEC 2018

Account Name EXELON NUC ALL MANAGERS

Account number EXLNTN

## Asset Summary

Page 15 of 9,098

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Liabilities</b>								
<b>Exchange cleared swap liabilities</b>								
Mexico - MXN	0.00	- 263,237.91	- 1,040.34	- 262,304.31	106.74	- 262,197.57	- 263,237.91	- 0.005%
New Zealand - NZD	0.00	- 46,028.62	0.00	- 46,028.62	0.00	- 46,028.62	- 46,028.62	- 0.001%
United Kingdom - GBP	0.00	- 230,040.08	- 160,036.25	- 72,503.51	2,499.68	- 70,003.83	- 230,040.08	- 0.004%
United States - USD	0.00	- 2,304,763.06	- 2,223,677.84	- 81,085.22	0.00	- 81,085.22	- 2,304,763.06	- 0.044%
<b>Total exchange cleared swap liabilities</b>	<b>0.00</b>	<b>- 3,696,321.11</b>	<b>- 3,227,369.37</b>	<b>- 600,166.23</b>	<b>131,205.09</b>	<b>- 468,961.14</b>	<b>- 3,696,321.11</b>	<b>- 0.070%</b>
<b>Total liabilities</b>	<b>0.00</b>	<b>- 6,501,102.02</b>	<b>- 5,658,063.64</b>	<b>- 972,827.13</b>	<b>129,788.75</b>	<b>- 843,038.38</b>	<b>- 6,501,102.02</b>	<b>- 0.123%</b>
<b>All Other</b>								
<b>Recoverable taxes</b>								
Recoverable taxes	98,762.09	0.00	0.00	0.00	0.00	0.00	98,762.09	0.002%
<b>Total recoverable taxes</b>	<b>98,762.09</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>98,762.09</b>	<b>0.002%</b>
<b>Total all other</b>	<b>98,762.09</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>98,762.09</b>	<b>0.002%</b>
<b>Cash and Cash Equivalents</b>								
<b>Bank deposits</b>								
Canada - CAD	0.00	2,049,734.96	2,119,173.71	2,943.33	- 72,382.08	- 69,438.75	2,049,734.96	0.039%
<b>Total bank deposits</b>	<b>0.00</b>	<b>2,049,734.96</b>	<b>2,119,173.71</b>	<b>2,943.33</b>	<b>- 72,382.08</b>	<b>- 69,438.75</b>	<b>2,049,734.96</b>	<b>0.039%</b>
<b>Repurchase agreements</b>								
United States - USD	- 155,849.26	- 50,456,225.00	- 50,456,225.00	0.00	0.00	0.00	- 50,612,074.26	- 0.961%
<b>Total repurchase agreements</b>	<b>- 155,849.26</b>	<b>- 50,456,225.00</b>	<b>- 50,456,225.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>- 50,612,074.26</b>	<b>- 0.961%</b>
<b>Short term bills and notes</b>								
United States - USD	0.00	1,359,079.94	1,356,839.35	2,240.59	0.00	2,240.59	1,359,079.94	0.026%
<b>Total short term bills and notes</b>	<b>0.00</b>	<b>1,359,079.94</b>	<b>1,356,839.35</b>	<b>2,240.59</b>	<b>0.00</b>	<b>2,240.59</b>	<b>1,359,079.94</b>	<b>0.026%</b>
<b>Cash &amp; cash equivalent deriv. - futures</b>								
United States - USD	0.00	1,827,250.00	1,972,246.87	- 144,996.87	0.00	- 144,996.87	1,827,250.00	0.035%

Northern Trust

Generated by Northern Trust from periodic data on 30 Jan 19



◆ **Asset Summary**

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Cash and Cash Equivalents</b>								
<b>Variation margin</b>								
	0.00	217,974.99	217,440.33	0.00	534.66	534.66	217,974.99	0.004%
<b>Total variation margin</b>	<b>0.00</b>	<b>217,974.99</b>	<b>217,440.33</b>	<b>0.00</b>	<b>534.66</b>	<b>534.66</b>	<b>217,974.99</b>	<b>0.004%</b>
<b>Cash collateral due to/from ccp broker</b>								
Cash Collateral Due to/from CCP Broker	0.00	1,294,375.64	1,277,609.23	0.00	16,766.41	16,766.41	1,294,375.64	0.025%
<b>Total cash collateral due to/from ccp broker</b>	<b>0.00</b>	<b>1,294,375.64</b>	<b>1,277,609.23</b>	<b>0.00</b>	<b>16,766.41</b>	<b>16,766.41</b>	<b>1,294,375.64</b>	<b>0.025%</b>
<b>Total cash and cash equivalents</b>	<b>- 16,644.96</b>	<b>10,938,471.01</b>	<b>11,079,305.98</b>	<b>- 52,103.57</b>	<b>-88,731.40</b>	<b>- 140,834.97</b>	<b>10,921,825.05</b>	<b>0.207%</b>
<b>Adjustments To Cash</b>								
<b>Pending foreign exchange purchases</b>								
<b>Beginning liability</b>								
Pending foreign exchange purchases	0.00	54,841,921.06	54,818,311.40	0.00	23,609.66	23,609.66	54,841,921.06	1.041%
<b>Total pending foreign exchange purchases</b>	<b>0.00</b>	<b>54,841,921.06</b>	<b>54,818,311.40</b>	<b>0.00</b>	<b>23,609.66</b>	<b>23,609.66</b>	<b>54,841,921.06</b>	<b>1.041%</b>
<b>Pending foreign exchange sales</b>								
<b>Beginning liability</b>								
Pending foreign exchange sales	0.00	- 54,325,483.70	- 54,818,311.40	0.00	492,827.70	492,827.70	-54,325,483.70	- 1.032%
<b>Total pending foreign exchange sales</b>	<b>0.00</b>	<b>- 54,325,483.70</b>	<b>- 54,818,311.40</b>	<b>0.00</b>	<b>492,827.70</b>	<b>492,827.70</b>	<b>-54,325,483.70</b>	<b>- 1.032%</b>
<b>Pending trade purchases</b>								
<b>Beginning liability</b>								
Pending trade purchases	0.00	- 148,926,567.00	- 148,926,200.90	0.00	-366.10	- 366.10	-148,926,567.00	- 2.828%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 148,926,567.00</b>	<b>- 148,926,200.90</b>	<b>0.00</b>	<b>-366.10</b>	<b>- 366.10</b>	<b>-148,926,567.00</b>	<b>- 2.828%</b>
<b>Pending trade sales</b>								
Pending trade sales	0.00	75,248,283.29	75,248,283.29	0.00	0.00	0.00	75,248,283.29	1.429%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>75,248,283.29</b>	<b>75,248,283.29</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>75,248,283.29</b>	<b>1.429%</b>
<b>Total adjustments to cash</b>	<b>0.00</b>	<b>- 73,161,846.36</b>	<b>- 73,677,917.61</b>	<b>0.00</b>	<b>616,071.26</b>	<b>616,071.26</b>	<b>-73,161,846.36</b>	<b>- 1.389%</b>

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# Fitzpatrick

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# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account Number FERCFF  
Account Name FERC FITZPATRICK

## ◆ Change in Book and Market Value

Page 1 of 9

	Cost	Market value	For more information	Beginning balance
Opening balance	389,455,517.77	837,714,137.50		
Miscellaneous Cash Receipts	685,156,339.00	685,156,339.00	See funding & disbursement summary	
Interportfolio Transfers In	1,877,512,804.71	1,877,512,804.71	See funding & disbursement summary	
Security Receipts	72,449.34	152,669.23	See funding & disbursement summary	
Total receipts	2,562,741,593.05	2,562,821,812.94	See funding & disbursement summary	
Miscellaneous Cash Disbursements	- 685,156,339.00	- 685,156,339.00	See funding & disbursement summary	
Participant Withdrawals	- 189,014.44	- 189,014.44	See funding & disbursement summary	
Interportfolio Transfers Out	- 1,877,512,804.71	- 1,877,512,804.71	See funding & disbursement summary	
Security Deliveries	- 72,449.34	- 152,997.22	See funding & disbursement summary	
Total disbursements	- 2,562,930,607.49	- 2,563,011,155.37	See funding & disbursement summary	
Income received	14,591,397.82	14,591,397.82	See income & expense summary, cash activity detail	
Expenses paid	- 123,440,690.42	- 123,440,690.42	See income & expense summary	
Unrealized gain/loss change	0.00	- 353,602,996.26	See asset summary	
Unrealized gain/loss on security movements	0.00	327.99	See funding & disbursement summary	
Realized gain/loss	423,120,797.56	423,120,797.56	See realized gain/loss summary	
Accrued income change	- 691,805.65	- 691,805.65	See income & expense summary	
Total amortization expense	- 236,150.66	- 236,150.66	See fixed income amortization	
Total OID/MKT accretion income	42,675,752.44	42,675,752.44	See fixed income amortization	
Return of capital	- 891.54	- 891.54	See capital change detail	
Closing balance	745,284,912.88	839,940,536.35		Ending balance

No rate payer contributions.

Northern Trust

Generated by Northern Trust from periodic data on 11 Feb 20

# Portfolio Statement

1 JAN 19 - 31 DEC 19

Account Number FERCFFP  
Account Name FERC FITZPATRICK

## ◆ Change in Cash Value

Page 2 of 9

	Market value	Cost	For more information
Opening balance	16,927,096.57	17,013,624.67	
Miscellaneous cash receipts	685,156,339.00	685,156,339.00	See funding & disbursement summary
Interportfolio transfers in	1,877,512,804.71	1,877,512,804.71	See funding & disbursement summary
Total receipts	2,562,669,143.71	2,562,669,143.71	See funding & disbursement summary
Miscellaneous cash disbursements	- 685,156,339.00	- 685,156,339.00	See funding & disbursement summary
Participant withdrawals	- 189,014.44	- 189,014.44	See funding & disbursement summary
Interportfolio transfers out	- 1,877,512,804.71	- 1,877,512,804.71	See funding & disbursement summary
Total disbursements	- 2,562,858,158.15	- 2,562,858,158.15	See funding & disbursement summary
Income received	14,578,971.36	14,578,971.36	See income & expense summary, cash activity detail
Expenses paid	- 123,440,690.42	- 123,440,690.42	See income & expense summary
Capital changes	5,085,881.89	5,085,881.89	See capital change detail
Foreign currency bought	187,853,087.00	187,853,087.00	See foreign exchange summary
Foreign currency sold	- 187,853,087.00	- 187,853,087.00	See foreign exchange summary
Realized gain/loss	276,341.56	276,341.56	See realized gain/loss summary
Unrealized gain/loss	88,839.08	0.00	See asset summary
Securities bought	- 1,489,973,738.63	- 1,489,973,738.63	See investment transaction summary
Securities sold	1,582,914,295.76	1,582,914,295.76	See investment transaction summary
Principal paydowns	17,050.85	17,050.85	See investment transaction summary
Intra portfolio transfer	0.00	0.00	
Closing balance	6,285,033.56	6,282,722.60	

Northern Trust

Generated by Northern Trust from periodic data on 11 Feb 20

# Portfolio Statement

31 DEC 2019

Account Number FERCFFP  
Account Name FERC FITZPATRICK

## ◆ Asset Summary

Page 9 of 9

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<i>Adjustments To Cash</i>								
<b>Pending trade purchases</b>								
Pending trade purchases	0.00	- 2,479,934.46	- 2,479,619.88	0.00	-314.58	- 314.58	-2,479,934.46	- 0.295%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 2,479,934.46</b>	<b>- 2,479,619.88</b>	<b>0.00</b>	<b>-314.58</b>	<b>- 314.58</b>	<b>-2,479,934.46</b>	<b>- 0.295%</b>
<b>Pending trade sales</b>								
Pending trade sales	0.00	873,499.51	873,215.45	0.00	284.06	284.06	873,499.51	0.104%
<b>Total pending trade sales</b>	<b>0.00</b>	<b>873,499.51</b>	<b>873,215.45</b>	<b>0.00</b>	<b>284.06</b>	<b>284.06</b>	<b>873,499.51</b>	<b>0.104%</b>
Total adjustments to cash	0.00	- 1,606,434.95	- 1,606,404.43	0.00	-30.52	- 30.52	-1,606,434.95	- 0.191%
Total Unrealized Gains						96,392,855.37		
Total Unrealized Losses						- 1,737,231.90		
<b>Total</b>	<b>2,608,400.08</b>	<b>837,332,136.27</b>	<b>742,676,512.80</b>	<b>93,710,376.68</b>	<b>946,247.88</b>	<b>94,656,623.47</b>	<b>838,940,636.36</b>	<b>100.000%</b>

Total Cost incl. Accruals

745,284,912.88

# Portfolio Statement

31 DEC 2018

Account Name FERC FITZPATRICK  
Account number FERCFFP

## ◆ Asset Summary

Page 8 of 8

Country	Accrued income/expense	Market value	Cost	Market	Unrealized gain/loss Translation	Total	Market value incl. accruals	%
<b>Adjustments To Cash</b>								
<b>Pending trade purchases</b>								
	0.00	- 265,800.52	- 265,800.52	0.00	0.00	0.00	-265,800.52	- 0.032%
<b>Total pending trade purchases</b>	<b>0.00</b>	<b>- 265,800.52</b>	<b>- 265,800.52</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-265,800.52</b>	<b>- 0.032%</b>
<b>Total adjustments to cash</b>	<b>0.00</b>	<b>- 265,800.52</b>	<b>- 265,800.52</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-265,800.52</b>	<b>- 0.032%</b>
<b>Total Unrealized Gains</b>						<b>452,844,468.86</b>		
<b>Total Unrealized Losses</b>						<b>- 4,585,849.12</b>		
<b>Total</b>	<b>3,300,205.73</b>	<b>834,413,931.77</b>	<b>386,155,312.04</b>	<b>447,332,909.24</b>	<b>925,710.49</b>	<b>448,268,619.73</b>	<b>837,714,137.60</b>	<b>100.0000%</b>

Total Cost incl. Accruals

389,455,517.77

Northern Trust

Generated by Northern Trust from reviewed periodic data on 29 Jan 19

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**FERC**

**Jurisdictional**

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◆ Allocation Schedule - Market Value

	-401- FERC Jurisdictional Rates	-402- Non-FERC Jurisdictional Rates	PLAN TOTALS
<b>Beginning Totals</b>	21,698,228.09	448,161,190.26	469,859,418.35
<b>Earnings</b>			
Balance	270,479.69	5,586,562.15	5,857,041.84
Interest Earned	204,865.25	4,231,343.91	4,436,209.16
Dividends Earned	20,333.67	419,977.29	440,310.96
Old/Market Accretion Income	2,606,828.65	53,842,159.31	56,448,986.96
Unrealized Gain/Loss Change	439,469.76	9,076,929.55	9,516,399.31
Realized Gain/Loss	(17,138.66)	(353,986.24)	(371,124.90)
Fees And Expenses	(8,111.77)	(167,542.35)	(175,654.12)
Old/Market Amortization Expense	(192,571.67)	(3,977,428.33)	(4,170,000.00)
Tax Payments	3,324,164.92	68,658,014.29	71,982,169.21
<b>Ending Totals</b>	26,022,383.01	616,819,204.55	641,841,587.56
Balance	4.61803%	95.38197%	100.00000%
Percent			

**No rate payer contributions**  
**No decom. expense**

The Plan Total reflects the total of underlying plan balances, and may not be equal to the sum of displayed columns.

Although this report has been prepared using information believed to be reliable, it may contain information provided by third parties or derived from third party information, and/or information that may have been obtained from, categorized or otherwise reported based upon client direction. The Northern Trust Company does not guarantee the accuracy, timeliness or completeness of any such information. The information included in this report is intended to assist clients with their financial reporting needs, but you must consult with your accountants, auditors and/or legal counsel to ensure your accounting and financial reporting complies with applicable laws, regulations and accounting guidance. The Northern Trust Company and its affiliates shall have no responsibility for the consequences of investment decisions made in reliance on information contained in this report.



10 CFR 50.75(f)(1)  
10 CFR 50.82(a)(8)

March 26, 2020

ZS-2020-0018

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Zion Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-39 and DPR-48  
NRC Docket Nos. 50-295 and 50-304

Subject: Report on Status of Decommissioning Funding for Shutdown Reactors

- References:
1. Exelon Generation Corporation (EGC) Letter RS-08-009, "Application for License Transfers and Conforming Administrative License Amendments," dated January 25, 2008
  2. Nuclear Regulatory Commission (NRC) Letter, J. Hickman to P. Daly, *ZionSolutions, LLC*, "Order Approving Transfer of Licenses and Conforming Amendments Relating to Zion Nuclear Power Station, Units 1 and 2," dated May 4, 2009
  3. *ZionSolutions, LLC* Letter, P. Daly to NRC, "Notification of Amended Post-Shutdown Decommissioning Activities Report (PSDAR) for Zion Nuclear Power Station, Units 1 and 2," dated March 18, 2008
  4. *ZionSolutions, LLC* Letter, D. Beckman to J. Hickman, "Notification of a Significant Schedule Change from that provided in the Amended Post-Shutdown Decommissioning Activity Report," dated November 23, 2010
  5. NRC Letter, A. Persinko to J. Sauger, *ZionSolutions, LLC*, "Zion Nuclear Power Station, Units 1 and 2, Request for Exemption from Certain Decommissioning Trust Fund Requirements of the Decommissioning Regulations," dated July 21, 2014
  6. *ZionSolutions, LLC* Letter, G. van Noordennen, "Report on Status of Decommissioning Funding for Shutdown Reactors," dated March 26, 2019
  7. NRC Letter, J. Hickman to J. Sauger, "Zion Nuclear Power Station, Units 1 and 2 – Request for Additional Information Related to the Status of Decommissioning Funding for Shutdown Reactors, dated May 22, 2019.

In accordance with 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning," paragraph (f)(1), and 10 CFR 50.82, "Termination of license," paragraph (a)(8), *ZionSolutions, LLC* (ZS) is submitting a report on the status of funding for decommissioning Zion Nuclear Power Station (ZNPS), Units 1 and 2, and managing the associated irradiated fuel. The revised annual radiological decommissioning and irradiated fuel management funding assurance report for ZNPS is provided in Attachment 1 to this letter for the period ending December 31, 2019.

The minimum required decommissioning funding assurance amount is based on a site-specific decommissioning cost estimate determined in accordance with 10 CFR 50.82(a). A change to the spent fuel management strategy was described in the application for license transfer (Reference 1), accepted by the NRC via Reference 2, and further described in the amended PSDAR (Reference 3). Reference 4 provided the decommissioning schedule that included adjustments resulting from incorporation of the actual calendar date of the asset and NRC license transfers as well as refinement of individual activity sequencing as the project planning achieved more detail.

Each of those references addressed the project's planning and scheduling basis, the associated estimated costs and the available funds for decommissioning, decontamination, dismantlement, and spent fuel management of both ZNPS units as an integrated project. As described in those references, radiological decommissioning as represented by the ZNPS integrated plan includes removal of the fuel to a dry storage facility and the decontamination and dismantlement of the radiologically involved systems, structures, and components. The attached decommissioning cost estimate does not include the costs of dismantling non-radiological systems and structures and other non-radiological site restoration. A ZS exemption was issued by the NRC to confirm ZS authority to use the decommissioning trust fund for costs associated with both decommissioning activities and spent fuel management (Reference 5).

ZS agreements with EGC include rights that will enable ZS to return the decontaminated site and transfer the Independent Spent Fuel Storage Installation (ISFSI), spent fuel, remaining Greater than Class C (GTCC) waste, and associated NRC licenses to EGC on or before September 1, 2020. Once these transfers are accomplished, EGC would maintain the irradiated fuel, including ongoing financial responsibility, until title to and possession of the irradiated fuel is transferred to the Department of Energy for its ultimate disposition. These latter, ongoing costs are not included in the decommissioning estimates herein.

NRC review of this decommissioning management strategy and the associated funding and cost estimate was accomplished as part of the NRC approval of the transfer of the ZNPS operating licenses to ZS (Reference 2). For purposes of consistency with References 1, 2 and 3, the results of the end of year 2019 funding and cost estimate shown in Attachment 1 are aggregated for the entire project as Unit 1 and Unit 2 are being decommissioned concurrently as a single integrated project. This is consistent with the licensing basis and integrated plans for sequencing radiological decommissioning and fuel management reflected in the references. Since the time of the last estimate provided in Reference 3, the cost and funding estimate have been adjusted for market value changes in the decommissioning trust fund (DTF), refinement of the cost and schedule estimate reflecting more mature knowledge gained from the new cost-significant contracts for various decommissioning and fuel management activities, and more developed cost allocations among the activities for radiological and non-radiological work. While this report excludes costs and discussion of non-radiological site restoration, ZS will complete that work as part of the contract scope with EGC.

Attachment 1 provides the aggregated, minimum estimated cost (funds needed) for concurrent radiological decommissioning of both nuclear units and for spent fuel management for the remainder of the ten year contract period (corresponding to Item B in Attachment 1), as defined by the prior submittals, planned decommissioning sequences, and work breakdown structure. This estimate has been developed from the site aggregate decommissioning schedule and provides the cost and funding allocation necessary to optimally decommission the radiologically involved systems, structures and components consistent with the NRC accepted decommissioning strategy. For completeness, the funding amount from the trust for both Unit 1 and Unit 2, as components of the total DTF value (Item A); the projected end of project surplus (Item D), based on the trust fund amount as of December 31, 2019, less the estimate of costs to complete decommissioning, plus annual earnings and less taxes through the end of the project on or before 2020; the estimated cost to complete decommissioning activities (Item E); the projected costs to

ZionSolutions, LLC

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manage the irradiated fuel until fuel management responsibility transfers back to EGC on or before September 1, 2020 (Item F); and the total amount spent on decommissioning (Item G), both cumulatively (September 2010 – December 31, 2018) and for calendar year 2019 is included in the attached report and is accurate as of December 31, 2019.

Disbursements from the trust fund have been made in accordance with the conditions of the ZNPS licenses, including the required advance notifications to the Office of Nuclear Reactor Regulation.

There are no regulatory commitments contained within this letter.

If you have any questions about this letter, please contact me at (860) 462-9707.

Respectfully,

Gerard van Noordennen  
Senior Vice President Regulatory Affairs

cc: John Hickman, U.S. NRC Senior Project Manager  
Service List

Attachments:

Annual Radiological Decommissioning and Irradiated Fuel Management Funding Assurance Report for Zion Nuclear Power Station, Aggregate Costs

## Zion Nuclear Power Station, Unit 1 and 2 License Transfer Service List

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**ATTACHMENT 1**  
**Annual Radiological Decommissioning and Irradiated Fuel Management Funding Assurance Report for Zion Nuclear Power Station, Aggregate Costs**

December 31, 2019  
 (2019 dollars, millions)

<u>Trust Fund Amount at December 31, 2019 (A1)</u>	<u>\$5.3M</u>
<u>Funding Assurance (Letter of Credit) other than the Trust Fund Amount (A2)</u>	<u>\$25M<sup>1</sup></u>
<u>NRC Required Minimum Funding Assurance Amount at December 31, 2019 (B)=(E)+(F)</u>	<u>\$5.4M</u>
<u>Difference in Trust Fund Amount versus Required Minimum Funding at December 31, 2019 – Surplus/(Shortfall) (C) = (A1) - (B)</u>	<u>(\$0.1M)</u>
<u>Difference in Total Funding Assurance Amount versus Required Minimum Funding Assurance at December 31, 2019 (A1)+(A2)-(B)</u>	<u>\$24.9</u>
<u>Projected End of Project Surplus at December 31, 2019 (D)</u>	<u>\$0.0<sup>2</sup></u>
<u>Estimated Costs to Complete Decommissioning at December 31, 2019 (E)</u>	<u>\$3.3M</u>
<u>Projected Costs to Manage Irradiated Fuel at December 31, 2019 (F)</u>	<u>\$2.1M<sup>3</sup></u>
<u>Amount Spent on Decommissioning (G):</u>	
<u>Cumulative (September 2010 – December 31, 2018)</u>	<u>\$651.5</u>
<u>Calendar Year 2019</u>	<u>\$6.3M</u>
<u>Cumulative (September 2010 – December 31, 2019)</u>	<u>\$657.8M<sup>4</sup></u>

<sup>1</sup> This NDT position, together with \$25 million Letter of Credit backup for the NDT provides sufficient funding and financial assurance for the completion of radiological decommissioning of the Zion Project. EnergySolutions will continue to fund additional decommissioning project activities using company cash reserves.

<sup>2</sup> Value is based on the trust fund amount as of December 31, 2019, less the estimate of costs to complete decommissioning, plus annual earnings and less tax through the end of the project.

<sup>3</sup> This represents the costs to complete the safe, secure operation of the ISFSI and associated infrastructure until the Zion site transitions back to EGC.

<sup>4</sup> The amounts spent on decommissioning represents withdrawals made from the trust fund reported for radiological decommissioning.

General Notes:

- The required minimum funding assurance amount is based on the decommissioning scenario from the site-specific decommissioning cost estimate provided in Reference 3. The cost estimate reflects actual experience to date, as well as forecast refinements made through the date of this filing.
- There are no additional funds to be collected.
- A 2% annual real rate of return is assumed in these calculations.
- There are no contracts relied upon pursuant to 10 CFR 50.75(e)(1)(v).
- Financial assurance for decommissioning is provided by the prepayment method, coupled with an external trust fund, in accordance with 10 CFR 50.75(e)(1)(i), in conjunction with a \$25 million Letter of Credit payable to the Backup Decommissioning Trust in accordance with 10 CFR 50.75 (e)(1)(iii). EnergySolutions has provided, and will continue to provide, to ZionSolutions funds necessary to complete decommissioning.
- There are no material changes to the trust fund agreements or financial assurance contracts as described at the time of transfer of the licenses, except for the reduction of the Letter of Credit held by EGC. Pursuant to the contract between EnergySolutions and EGC, the Letter of Credit amount plus Trust Funds will be at least 200% of the remaining costs to complete decommissioning. As of December 31, 2019, the Letter of Credit amount had been reduced to \$25 million.
- ZS has funds sufficient to meet its obligations to manage spent fuel safely as requisite to the current cost estimates for the project and pursuant to 10 CFR 50.82(a)(8)(vii). The estimated cost to manage the irradiated fuel, as reported above (Item F), includes O&M and Security costs associated with managing the ISFSI until the site transitions back to EGC.
- Upon completion of the decommissioning project, ZS will transfer the ISFSI to EGC. EGC will assume responsibility to manage the spent fuel safely from that date until title to and possession of the irradiated fuel is transferred to the Secretary of Energy for its ultimate disposition. On September 1, 2010, in accordance with the ASA, EGC retained \$25 million of the Decommissioning Trust Fund for this purpose. The \$25 million retained by EGC is not included in the remaining Decommissioning Trust Fund amount as reported above (Item A).
- Inquiries regarding the management of spent nuclear fuel beyond completion of the decommissioning project should be directed to EGC.