

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS



Received
on

APR 20 2012

by
State Corporation Commission
of Kansas

DIRECT TESTIMONY OF
GREGG N. CLIZER
ON BEHALF OF
KANSAS CITY POWER & LIGHT COMPANY

IN THE MATTER OF THE APPLICATION OF
KANSAS CITY POWER & LIGHT COMPANY
TO MAKE CERTAIN CHANGES IN
ITS CHARGES FOR ELECTRIC SERVICE

DOCKET NO. 12-KCPE-764-RTS

- 1 **Q:** Please state your name and business address.
- 2 A: My name is Gregg N. Clizer. My business address is 1200 Main Street, Kansas City,
3 Missouri 64105.
- 4 **Q:** By whom and in what capacity are you employed?
- 5 A: I am employed by Kansas City Power & Light Company (“KCP&L” or the “Company”)
6 as Senior Manager, Corporate Finance.
- 7 **Q:** What are your responsibilities?
- 8 A: My responsibilities include the development, analysis, and implementation of financing
9 plans and a capital structure that allows the Company to maintain continuous access to
10 capital at the lowest overall cost.

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

2 A: The purpose of my testimony is to recommend a funding level for the Kansas
3 jurisdictional component of KCP&L's trust fund for the decommissioning of the Wolf
4 Creek Nuclear Generating Station ("Wolf Creek").

5 **Q: Please summarize your recommendation regarding the appropriate funding level**
6 **for the Kansas jurisdictional component of KCP&L's trust fund for the**
7 **decommissioning of Wolf Creek.**

8 A: I am recommending that the annual funding level for the Kansas jurisdictional component
9 of KCP&L's trust fund for the decommissioning of Wolf Creek be set at \$2,036,230 as
10 shown in attached Schedule GNC-1. This amount is reflected in adjustment CS-37 on the
11 Summary of Adjustments attached to the Direct Testimony of KCP&L witness John P.
12 Weisensee as Schedule JPW-4. This funding level will begin in January 2013 when rates
13 in this case become effective and will continue at the same level through the first quarter
14 of 2045 unless the funding level is changed in a future proceeding before the Kansas
15 Corporation Commission ("KCC" or "Commission"). Wolf Creek's operating license is
16 currently set to expire in 2045.

17 **Q: Before you go into further detail regarding the Wolf Creek funding level, will you**
18 **please describe your education, experience and employment history?**

19 A: Yes. I graduated from the University of Missouri-Columbia in 1981 with a Bachelor of
20 Science degree in Industrial Engineering. I received a Master of Business Administration
21 degree from the University of Missouri-Kansas City in 1987. I am a registered
22 Professional Engineer in the State of Missouri. I have been employed by KCP&L or its
23 affiliates since 1981 in various roles in the areas of Corporate Planning, Corporate

1 Modeling, Business Development, Financial Planning and Corporate Budgets as well as
2 my current role in Corporate Finance.

3 **Q: Have you previously testified in a proceeding at the KCC or before any other utility**
4 **regulatory agency?**

5 A: Yes. I provided testimony to the KCC in Docket No. 09-WCNE-215-GIE, Docket No.
6 10-KCPE-415-RTS (“415 Docket”), and Docket No. 12-WCNE-136-GIE (“136
7 Docket”), the current Wolf Creek decommissioning cost docket open before the
8 Commission.¹ I have also provided written testimony to the Missouri Public Service
9 Commission (“MPSC”).

10 **Q: Now, returning to the purpose of your testimony will you please explain how your**
11 **recommended funding level for this rate case compares to the existing funding level?**

12 A: The recommended annual funding level for the Kansas jurisdictional component of
13 KCP&L’s decommissioning trust fund of \$2,036,230 is identical to the current funding
14 level.

15 **Q: Please outline the assumptions that were used to arrive at the appropriate accrual**
16 **level.**

17 A: The following factors were considered to determine the appropriate accrual level:

- 18 ▪ Decommissioning Cost Estimate;
- 19 ▪ Decommissioning Cost Escalation Rate;
- 20 ▪ Decommissioning Cost Timing;
- 21 ▪ Remaining Life of the Fund;

¹ Docket No. 12-WCNE-136-GIE, *In the Matter of the 2011 Wolf Creek Decommissioning Cost Study as Provided by Wolf Creek Nuclear Operating Corporation on August 31, 2011 in Accordance with the Commission's Order in Docket Number 163,561-U on December 9, 1992*, was filed on August 31, 2011. The parties filed a unanimous Stipulation and Agreement on April 2, 2012 which is currently pending before the Commission.

- 1 ▪ KCP&L's Ownership Percentage;
- 2 ▪ Kansas Jurisdictional Allocation Factor;
- 3 ▪ Trust Fund Investment Mix;
- 4 ▪ Trust Fund Management Fees;
- 5 ▪ Taxes on Fund Earnings;
- 6 ▪ Earnings on Fund Investments;
- 7 ▪ Current Trust Fund Balance;
- 8 ▪ Accrual Escalation Methodology; and
- 9 ▪ IRS Tax Qualification of the Trust.

10 Each of these items will be addressed in turn below.

11 **Decommissioning Cost Estimate**

12 **Q: What is the current dollar decommissioning cost estimate for Wolf Creek and what**
13 **is the basis for that estimate?**

14 A: As presented in the 136 Docket, the decommissioning cost estimate for Wolf Creek is
15 \$630,135,000 in 2011 dollars. This cost estimate is based on a study dated August 2011
16 performed by TLG Services, Inc. ("TLG"). TLG is a recognized industry leader in the
17 area of nuclear decommissioning cost analysis. The \$630,135,000 cost estimate is based
18 on the immediate dismantlement and site restoration alternative for decommissioning.
19 The TLG study was filed with the Commission on August 31, 2011 in the 136 Docket.

20 **Q: Has the Commission previously considered the reasonableness of this cost estimate?**

21 A: No. However, the parties to the 136 Docket filed a unanimous Stipulation and
22 Agreement ("S&A") with the Commission on April 2, 2012 in which all parties agreed

1 that the cost estimate was reasonable. The S&A is currently pending before the
2 Commission.

3 **Decommissioning Cost Escalation Rate**

4 **Q: What decommissioning cost escalation rate are you recommending?**

5 A: I am recommending a cost escalation rate of 2.85% per year to escalate the 2011
6 decommissioning cost estimate of \$630,135,000 from 2011 dollars to the appropriate
7 year dollars for when the decommissioning costs are expected to occur. This is the same
8 escalation rate that I recommended in my Direct Testimony in the 136 Docket and which
9 was agreed to by all parties in that docket and included in the aforementioned S&A
10 presented to the Commission.

11 **Q: What index or formula was the basis for your recommended cost escalation rate?**

12 A: There are a number of indices such as the Consumer Price Index (“CPI”) or the Gross
13 Domestic Product (“GDP”) Deflator that are often used to measure changes in prices or
14 inflation. Unfortunately, none of these indices specifically relates to inflation in nuclear
15 decommissioning costs. The TLG Wolf Creek decommissioning cost study has identified
16 five main cost drivers (labor cost, equipment and material cost, energy cost, burial cost,
17 and other cost) in the nuclear decommissioning cost estimate. I used a formula based on
18 the allocation of cost to these cost drivers and applied indices appropriate for each cost
19 driver.

20 **Q: Please describe the allocation of cost used in the formula.**

21 A: The TLG decommissioning cost estimate included the following allocation of cost
22 drivers:

| | | | |
|---|---------------|----------------------------|---------|
| 1 | \$370,528,000 | Labor Cost | (58.8%) |
| 2 | \$109,356,000 | Equipment & Materials Cost | (17.4%) |
| 3 | \$ 7,145,000 | Energy Cost | (1.1%) |
| 4 | \$ 70,855,000 | Burial Cost | (11.2%) |
| 5 | \$ 72,252,000 | Other Costs | (11.5%) |

6 It should be noted that the Energy Cost driver is further allocated between two
7 components, namely, Industrial Electric Power at 58% of total energy cost and Light Fuel
8 Oil at 42% of total energy cost.

9 **Q: What is the source for the indices used for each cost component of your formula?**

10 A: I utilized a long range forecast published by Moody’s Analytics as the source for the cost
11 escalation estimates for each of the cost components of the formula except for burial
12 costs. Moody’s Analytics is a well-known and respected source of economic forecasts,
13 and its website at www.economy.com contains projections for numerous indices included
14 in the formula. The Moody’s Analytics forecast includes projections for future years
15 through 2041. I utilized the compound annual growth rate from 2011 to 2041 as a proxy
16 for the growth rate from 2011 through the decommissioning period. For Labor Cost, I
17 used the Employment Cost Index (“ECI”) for total compensation—all civilians and all
18 workers. For the electricity component of the Energy Cost, I used the Producer Price
19 Index (“PPI”) for electric power—total. For the fuel oil component of the Energy Cost, I
20 used the PPI for No. 2 fuel oil. For the Equipment and Materials Cost, I used the PPI for
21 all commodities. For the Other Cost, I used the Consumer Price Index (“CPI”) for urban
22 customers—all items.

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

2 A: Unfortunately, the Moody's Analytics forecast does not include a projection of burial
3 costs. However, the Nuclear Regulatory Commission's *Report on Waste Burial Charges:
4 Changes in Decommissioning Waste Disposal Costs at Low-Level Waste Burial Facilities
5 NUREG-1307, Revision 11 and NUREG-1307, Revision 14*, contain some historical
6 indices for burial costs at the Washington and South Carolina low-level waste storage
7 sites. While neither of these storage sites currently accept low-level waste from
8 generators that are not located in the Northwest, Rocky Mountain, or Atlantic Compact
9 states, the historical burial cost indices for these sites can serve as reasonable proxies for
10 future burial cost escalation at other potential future low-level waste storage sites.

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

12 A: For all of the cost components except burial cost I calculated the geometric mean of the
13 Moody's Analytics projections for years 2011 through 2041 and used these geometric
14 means in the formula. As previously noted, Moody's Analytics only provided future
15 projections through the year 2041. For the burial component I calculated the geometric
16 means for years 1995 through 2010 (PWR/Compact/Direct Disposal) for the Washington
17 and South Carolina sites, respectively, and averaged the geometric means for the two
18 sites. The results for the various components of the formula are:

| | | |
|----|---------------------------|------|
| 19 | Labor Cost | 2.5% |
| 20 | Equipment & Material Cost | 1.6% |
| 21 | Energy Cost: Electricity | 1.5% |
| 22 | Fuel Oil | 2.6% |
| 23 | Burial Cost | 7.4% |

1 **KCP&L's Ownership Percentage**

2 **Q: What is KCP&L's ownership percentage in Wolf Creek?**

3 A: KCP&L owns 47% of Wolf Creek.

4 **Kansas Jurisdictional Allocation Factor**

5 **Q: What Kansas jurisdictional allocation factor did you use in the determination of the**
6 **accrual level?**

7 A: I used a Kansas jurisdictional allocation factor of 43.19% in the accrual calculation. The
8 methodology used for calculating the Kansas jurisdictional allocation factor is consistent
9 with the methodology used in previous KCP&L cases involving Wolf Creek
10 decommissioning funding.

11 **Q: What is the basis for the Kansas jurisdictional allocation factor?**

12 A: Because of the unique nature of the decommissioning funding, the appropriate
13 jurisdictional allocation factor is the weighted average of the jurisdictional demand
14 allocation factors applicable to the jurisdiction in question throughout the entire life of
15 Wolf Creek, both historical and future. The jurisdictional demand allocation factor I
16 calculated for 2011 was used as a proxy for the jurisdictional demand allocation factors
17 for the future years from 2012 to 2045.

18 **Trust Fund Investment Mix**

19 **Q: What trust fund investment mix did you use in the determination of the accrual**
20 **level?**

21 A: I used an assumed investment mix of 65% equity and 35% fixed income. The 65%
22 equity allocation is made up of 41% U.S. large company stocks, 9% U.S. small company
23 stocks, and 15% international equities. This mix is consistent with the investment

1 guidelines agreed to by KCP&L and the fund managers. These investment guidelines, in
2 the view of KCP&L, provide for a portfolio that maintains an appropriate balance
3 between minimizing risk and maximizing return. I have assumed that this investment
4 mix will remain in place until 2025. After 2025, I have gradually shifted the investment
5 mix described above to reduce the equity allocation and increase the allocation to fixed
6 income securities and U.S. Treasury bills (“T-bills”) such that, by the start of
7 decommissioning in 2045, the portfolio is assumed to consist of 50% fixed income and
8 50% T-bills. During the period of decommissioning from 2045 to 2053, I have gradually
9 shifted the investment mix to consist of 100% T-bills. These shifts in the investment mix
10 were intended to provide for a portfolio that minimizes the risk of loss and improves the
11 liquidity of the fund as the need for the decommissioning funds becomes imminent.

12 **Q: Do KCP&L and the fund managers periodically monitor and review the**
13 **appropriateness of the investment guidelines?**

14 A: Yes, and these reviews will continue to occur as time goes on and circumstances change.
15 For instance, in the past the investment guidelines were altered in order to facilitate the
16 fund’s move out of municipal bonds when a change in the tax rate on the fund earnings
17 reduced the relative attractiveness of municipal bonds. Changes were also made to the
18 investment guidelines based on the license extension that was approved for Wolf Creek
19 in 2008.

20 **Trust Fund Management Fees**

21 **Q: What are the estimated trust fund management fees?**

22 A: The trust fund management fees consist of an estimated fixed trustee fee of \$50,000 per
23 year plus a variable fee of 21 basis points (0.21%) based on the market value of the fixed

1 income investments and a variable fee of no more than 10 basis points (0.10%) based on
2 the market value of the equity investments.

3 **Taxes on Fund Earnings**

4 **Q: What are the assumed taxes on the fund earnings?**

5 A: The treasuries, government bonds, corporate bonds, and corporate equities in the trust
6 fund are subject to Federal tax at a rate of 20% and are not subject to state tax. Any
7 municipal bonds in the trust would be subject to neither Federal nor state taxes.

8 **Earnings on Fund Investments**

9 **Q: What trust earnings rate did you assume in the determination of the accrual level?**

10 A: I calculated an assumed trust fund earnings rate at the initial investment mix described
11 above to be 5.60% after the taxes and fees also described above. The components of this
12 calculation are shown below.

| | <u>Investment Mix</u> | <u>Return After Fees & Taxes</u> |
|-----------------------------|-----------------------|--------------------------------------|
| 14 Large Corporate Equities | 41% | 7.13% |
| 15 Small Corporate Equities | 9% | 7.75% |
| 16 International Equities | 15% | 7.16% |
| 17 Fixed Income Investments | 35% | 2.58% |
| 18 U.S. Treasury Bills | <u>0%</u> | <u>0.76%</u> |
| 19 Total | <u>100%</u> | <u>5.60%</u> |

20 **Q: What was the source for your trust fund earnings rate assumptions?**

21 A: I utilized the historical total return data published by Ibbotson Associates titled *Ibbotson*
22 *SBBI 2012 Classic Yearbook Market Results for Stocks, Bonds, Bills, and Inflation 1926-*
23 *2011* (the “Ibbotson 2012 Yearbook”), as the source for my analysis of the expected

1 return for the various investment instruments in the portfolio. Ibbotson Associates is a
2 well-known and respected source for historical investment return data. The Ibbotson
3 2012 Yearbook contains return data for the years 1926 to 2011. I used historical return
4 data for 1985, the year Wolf Creek was placed in-service, to 2011 as the basis for my
5 expected return calculations. I used the methodology described in Chapter 11 of the
6 Ibbotson 2012 Yearbook to calculate expected returns for the investments in the trust
7 fund. I started with a riskless rate of 3.45% based on the 30-year U.S. Treasury coupon
8 rate as of March 20, 2012. The expected default premium based on the mean difference
9 between historical long-term corporate bonds and long-term government bond total
10 returns between 1985 and 2011 was negative, so I assumed no default premium and used
11 the 3.45% riskless rate as the expected return for long-term fixed income investments. I
12 calculated the expected large corporate equity return of 9.02% by adding a 5.57% equity
13 premium based on the mean difference between large company stock total returns and
14 long-term government bond income returns to the riskless rate of 3.45%. I calculated the
15 expected small corporate equity return of 9.79% by adding a 0.77% small stock premium
16 based on the mean difference between small company stock total returns and large
17 company stock total returns to the expected large corporate equity return of 9.02%. I
18 calculated the expected international equity return of 9.07% by adding a 0.05%
19 international stock premium based on the mean difference between international
20 company stock total returns and large company stock total returns to the expected large
21 corporate equity return of 9.02%. I calculated the expected T-bill return of 1.17% by
22 subtracting an expected long-term horizon premium of 2.28% (based on the mean
23 difference between long-term government bond income returns and T-bill total returns)

1 from the riskless rate of 3.45%. All of the expected returns were then reduced by the
2 management fees and income taxes to determine the expected net earnings used to
3 determine the accrual level.

4 **Q: How does this method of estimating the trust fund earnings rate differ from the**
5 **method you used the last time the funding level for the Kansas jurisdictional**
6 **component of KCP&L's trust fund for the decommissioning of Wolf Creek was**
7 **addressed?**

8 A: The last time the funding level was addressed was in the 415 Docket. The difference in
9 the methodology utilized in my testimony then versus now is that in the 415 Docket I
10 used all of the historical return data beginning in 1926 instead of using the historical
11 return data beginning with 1985, the year the Wolf Creek plant was placed in-service. I
12 believe the use of more recent historical return data provides a better estimate of expected
13 trust fund earnings in the future.

14 **Q: How does the assumed weighted average earnings rate of 5.60% after taxes and fees**
15 **compare to the actual earnings rate achieved after taxes and fees over the life of the**
16 **fund?**

17 A: The assumed earnings rate of 5.60% for Kansas jurisdictional contributions to the trust
18 fund after the payment of taxes and fees is 50 basis points higher than the actual internal
19 rate of return of 5.10% as of December 31, 2011.

20 **Current Trust Fund Balance**

21 **Q: What was the Kansas jurisdictional trust fund balance as of December 31, 2011?**

22 A: The market value of the Kansas jurisdictional portion of KCP&L's decommissioning
23 trust fund at December 31, 2011 was \$49,577,118 (including \$4,186,019 of net

1 unrealized gains). The balance is \$50,076,186, including KCP&L's January 2012 deposit
2 for the fourth-quarter 2011 accruals. Assuming an effective tax rate of 20% on
3 unrealized net gains, the net after-tax market value of the Kansas jurisdictional portion of
4 the trust was \$49,248,972 at December 31, 2011.

5 **Accrual Escalation Methodology**

6 **Q: What accrual escalation methodology was used in the determination of the accrual**
7 **level?**

8 A: A level annual amount of funding was assumed.

9 **Q: Was this level funding assumption utilized in the determination of the accrual**
10 **schedule previously approved by the KCC for KCP&L's Kansas jurisdictional**
11 **funding?**

12 A: Yes, a level funding assumption was utilized in the determination of the accrual
13 schedules approved by the KCC in both Docket No. 06-KCPE-828-RTS and the 415
14 Docket.

15 **Q: Is the level funding that you are recommending consistent with the funding**
16 **methodologies utilized by KCP&L in its Missouri jurisdiction?**

17 A: Yes, KCP&L has previously been authorized by the MPSC to utilize level funding.

18 **IRS Tax Qualification of the Trust**

19 **Q: What is meant by the term "tax qualification" as it relates to nuclear**
20 **decommissioning trust funds?**

21 A: A "tax-qualified" nuclear decommissioning trust fund is a fund that meets certain criteria
22 as defined in Section 468A of the Internal Revenue Code ("Section 468A"). Tax-
23 qualified nuclear decommissioning trust funds are afforded favorable tax treatment as

1 compared to non-qualified funds. There are two main tax advantages provided by a tax-
2 qualified fund. The first is that contributions made to the trust fund can be treated as
3 current-year tax deductions. The second is that earnings on the investments in the trust
4 fund are taxed at an applicable federal tax rate of 20% as compared to a 35% federal tax
5 rate on earnings in a non-qualified fund.

6 **Q: Did the Energy Policy Act of 2005 (“2005 EAct”) include any modifications to the**
7 **special rules for nuclear decommissioning and Section 468A?**

8 A: Yes, the 2005 EAct included a number of modifications to the special rules for nuclear
9 decommissioning. Among the modifications were amendments to Section 468A which
10 governs the tax qualification of nuclear decommissioning trust funds. These amendments
11 are effective for taxable years beginning after December 31, 2005.

12 **Q: What were the requirements for tax qualification under Section 468A prior to the**
13 **changes resulting from the 2005 EAct?**

14 A: Prior to the 2005 EAct, in order to ensure the continued tax qualification of the fund,
15 any change in the funding levels had to be filed with and approved by the Internal
16 Revenue Service (“IRS”). The IRS required a statement in an order of the state
17 commission (a) approving the schedule of decommissioning cost accruals; (b) finding
18 that the decommissioning cost accruals were included in cost of service and were
19 included in rates for ratemaking purposes; and (c) finding that the earnings rate assumed
20 for the trust took into consideration the tax rate change and the removal of the investment
21 restrictions resulting from the Energy Policy Act of 1992.

1 **Q: How have the requirements for tax qualification changed as a result of the changes**
2 **to Section 468A?**

3 A: There is no longer a cost of service requirement for tax-qualified funds. Previously,
4 deposits into a tax-qualified fund were limited by the amount included in cost of service
5 for ratemaking purposes (so long as that amount was not higher than what the level
6 funding amount would have been). Regarding the allowed level of funding into a tax-
7 qualified fund, the revised Section 468A states only that, “the amount which a taxpayer
8 may pay into the Fund for any taxable year shall not exceed the ruling amount applicable
9 to such taxable year.”

10 **Q: What was the rationale for the elimination of the cost of service requirement?**

11 A: The cost of service requirement was primarily eliminated to allow nuclear owners in
12 states that now have deregulated generation to maintain the tax-qualified status of their
13 trust funds in the absence of cost of service-based regulation.

14 **Q: Given the elimination of the cost of service requirement for tax-qualification of the**
15 **fund, what language would you request that the KCC put in its Order regarding the**
16 **amount of decommissioning funding in cost of service for ratemaking purposes?**

17 A: KCP&L respectfully requests that the KCC use the same language in the order approving
18 the decommissioning funding level that was required prior to the changes to
19 Section 468A. Use of the prior Section 468A language provides the greatest assurance of
20 continued tax-qualified decommissioning funding.

1 **Q: What factors previously discussed had a significant impact on the change in the**
2 **recommended annual funding level?**

3 A: As discussed earlier in my testimony, I am recommending that the annual funding level
4 remain the same as it is currently. Although the estimated decommissioning cost
5 increased between 2008 and 2011, the increase was less than projected. The
6 recommended escalation rate has decreased, but this impact is offset by a lower assumed
7 return on trust fund investments. When the revised decommissioning cost estimate is
8 combined with a lower escalation rate assumption and a lower earnings rate assumption,
9 the change in the recommended annual funding requirement is insignificant at less than
10 \$3000 per year. Given that small change, KCP&L is recommending that the annual
11 funding accrual remain as currently set.

12 **Q: Does this conclude your testimony?**

13 A: Yes, it does.

Schedule GNC-1

KANSAS CITY POWER & LIGHT COMPANY
WOLF CREEK DECOMMISSIONING TRUST ANALYSIS
KANSAS JURISDICTION - QUALIFIED TAXABLE TRUST

DECOMMISSIONING COST ASSUMPTIONS

| | |
|------------------------------------|----------------|
| 2008 Decom Cost Est | \$ 630,135,000 |
| Cost Escalation Rate | 2.85% |
| KCPL Share | 47.00% |
| Future Juris Allocation Factor | 45.64% |
| Wtd Historical/Future Alloc Factor | 43.19% |

DECOMMISSIONING TRUST FUND EARNINGS ASSUMPTIONS

| TRUST FUND MANAGEMENT FEE | |
|---------------------------|-------------|
| Kansas Avg Fund Bal | 170,614,090 |
| Kansas Ann Fixed Fee | 22,818 |
| Fixed Fee % | 0.01% |
| FI Fee and Fixed Fee% | 0.22% |
| Equity Fee and Fixed Fee | 0.11% |

DECOMMISSIONING TRUST FUND CASH FLOWS

| NET AFTER-TAX MARKET VALUE | |
|--------------------------------|------------|
| December 31, 2011 Market Value | 49,577,118 |
| Q4 2011 Outstanding Deposit | 509,058 |
| Market Value Incl OS Deposit | 50,086,176 |
| Unrealized Net Gain | 4,186,019 |
| Effective Tax Rate | 20.00% |
| Tax on Unrealized Net Gain | 837,204 |
| Net After-Tax Market Value | 49,248,972 |
| Annual Accrual Escalation | 0.00% |

| Year | 2011 Wolf Creek Decom Cost | Escalated Wolf Creek Decom Cost | KCPL Kansas Decom Cost |
|------|----------------------------------|---------------------------------------|------------------------------|
| 2011 | - | - | - |
| 2012 | - | - | - |
| 2013 | - | - | - |
| 2014 | - | - | - |
| 2015 | - | - | - |
| 2016 | - | - | - |
| 2017 | - | - | - |
| 2018 | - | - | - |
| 2019 | - | - | - |
| 2020 | - | - | - |
| 2021 | - | - | - |
| 2022 | - | - | - |
| 2023 | - | - | - |
| 2024 | - | - | - |
| 2025 | - | - | - |
| 2026 | - | - | - |
| 2027 | - | - | - |
| 2028 | - | - | - |
| 2029 | - | - | - |
| 2030 | - | - | - |
| 2031 | - | - | - |
| 2032 | - | - | - |
| 2033 | - | - | - |
| 2034 | - | - | - |
| 2035 | - | - | - |
| 2036 | - | - | - |
| 2037 | - | - | - |
| 2038 | - | - | - |
| 2039 | - | - | - |
| 2040 | - | - | - |
| 2041 | - | - | - |
| 2042 | - | - | - |
| 2043 | - | - | - |
| 2044 | - | - | - |
| 2045 | 51,401,000 | 133,634,205 | 27,125,320 |
| 2046 | 116,516,000 | 311,555,863 | 63,240,191 |
| 2047 | 134,993,000 | 371,249,524 | 75,356,922 |
| 2048 | 92,331,000 | 261,159,899 | 53,010,724 |
| 2049 | 75,500,000 | 219,639,376 | 44,582,811 |
| 2050 | 68,339,000 | 204,473,092 | 41,504,330 |
| 2051 | 39,401,000 | 121,249,257 | 24,611,401 |
| 2052 | 31,890,000 | 100,932,413 | 20,487,450 |
| 2053 | 19,764,000 | 64,336,181 | 13,059,078 |
| | 630,135,000 | 1,788,229,810 | 362,978,225 |

| Year | Investment Mix | | | | | Weighted After-Tax Earnings | |
|------|-----------------------------|-----------------|--------------------|-----------------|--------------------|-----------------------------------|-------|
| | US T-Bills | Fixed Income | Inter- national | Small Stocks | Lrg Corp Stocks | | |
| | Pre-tax Returns | 1.17% | 3.45% | 9.07% | 9.79% | 9.02% | |
| | Effective Tax Rate | 20.0% | 20.0% | 20.0% | 20.0% | 20.0% | |
| | Earnings After Fees & Taxes | 0.76% | 2.58% | 7.16% | 7.75% | 7.13% | |
| 2011 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2012 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2013 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2014 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2015 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2016 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2017 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2018 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2019 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2020 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2021 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2022 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2023 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2024 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2025 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 5.60% |
| 2026 | | 2.5% | 35.8% | 14.3% | 8.6% | 39.0% | 5.40% |
| 2027 | | 5.0% | 36.5% | 13.5% | 8.1% | 36.9% | 5.21% |
| 2028 | | 7.5% | 37.3% | 12.8% | 7.7% | 34.9% | 5.01% |
| 2029 | | 10.0% | 38.0% | 12.0% | 7.2% | 32.8% | 4.81% |
| 2030 | | 12.5% | 38.8% | 11.3% | 6.8% | 30.8% | 4.62% |
| 2031 | | 15.0% | 39.5% | 10.5% | 6.3% | 28.7% | 4.42% |
| 2032 | | 17.5% | 40.3% | 9.7% | 5.9% | 26.7% | 4.22% |
| 2033 | | 20.0% | 41.0% | 9.0% | 5.4% | 24.6% | 4.03% |
| 2034 | | 22.5% | 41.8% | 8.2% | 5.0% | 22.6% | 3.83% |
| 2035 | | 25.0% | 42.5% | 7.5% | 4.5% | 20.5% | 3.64% |
| 2036 | | 27.5% | 43.3% | 6.7% | 4.1% | 18.5% | 3.44% |
| 2037 | | 30.0% | 44.0% | 6.0% | 3.6% | 16.4% | 3.24% |
| 2038 | | 32.5% | 44.8% | 5.2% | 3.2% | 14.4% | 3.05% |
| 2039 | | 35.0% | 45.5% | 4.5% | 2.7% | 12.3% | 2.85% |
| 2040 | | 37.5% | 46.3% | 3.7% | 2.3% | 10.3% | 2.65% |
| 2041 | | 40.0% | 47.0% | 3.0% | 1.8% | 8.2% | 2.46% |
| 2042 | | 42.5% | 47.8% | 2.2% | 1.4% | 6.1% | 2.26% |
| 2043 | | 45.0% | 48.5% | 1.5% | 0.9% | 4.1% | 2.06% |
| 2044 | | 47.5% | 49.3% | 0.7% | 0.4% | 2.0% | 1.87% |
| 2045 | | 50.0% | 50.0% | 0.0% | 0.0% | 0.0% | 1.67% |
| 2046 | | 56.3% | 43.8% | 0.0% | 0.0% | 0.0% | 1.56% |
| 2047 | | 62.5% | 37.5% | 0.0% | 0.0% | 0.0% | 1.44% |
| 2048 | | 68.8% | 31.3% | 0.0% | 0.0% | 0.0% | 1.33% |
| 2049 | | 75.0% | 25.0% | 0.0% | 0.0% | 0.0% | 1.22% |
| 2050 | | 81.3% | 18.8% | 0.0% | 0.0% | 0.0% | 1.10% |
| 2051 | | 87.5% | 12.5% | 0.0% | 0.0% | 0.0% | 0.99% |
| 2052 | | 93.8% | 6.3% | 0.0% | 0.0% | 0.0% | 0.87% |
| 2053 | | 100.0% | 0.0% | 0.0% | 0.0% | 0.0% | 0.76% |
| 2025 | | 0.0% | 35.0% | 15.0% | 9.0% | 41.0% | 100% |
| 2045 | | -2.50% | -0.75% | 0.75% | 0.45% | 2.05% | 100% |
| 2053 | | 50.00% | 50.00% | 0.00% | 0.00% | 0.00% | 100% |
| 2053 | | -6.25% | 6.25% | 0.00% | 0.00% | 0.00% | 100% |
| 2053 | | 100.00% | 0.00% | 0.00% | 0.00% | 0.00% | 100% |

| Year | Trust Fund Accrual | Trust Fund Expenditure | Earnings After Fees & Taxes | Trust Fund Balance |
|---------|--------------------------|------------------------------|-----------------------------------|--------------------------|
| 9/30/11 | | | | 49,248,972 |
| 2011 | | | | 54,084,889 |
| 2012 | 2,036,230 | 0 | 2,799,687 | 59,191,518 |
| 2013 | 2,036,230 | 0 | 3,070,400 | 64,584,015 |
| 2014 | 2,036,230 | 0 | 3,356,267 | 70,278,383 |
| 2015 | 2,036,230 | 0 | 3,658,137 | 76,291,519 |
| 2016 | 2,036,230 | 0 | 3,976,906 | 82,641,269 |
| 2017 | 2,036,230 | 0 | 4,313,520 | 89,346,475 |
| 2018 | 2,036,230 | 0 | 4,668,977 | 96,427,037 |
| 2019 | 2,036,230 | 0 | 5,044,332 | 103,903,967 |
| 2020 | 2,036,230 | 0 | 5,440,699 | 111,799,452 |
| 2021 | 2,036,230 | 0 | 5,859,256 | 120,136,925 |
| 2022 | 2,036,230 | 0 | 6,301,242 | 128,941,126 |
| 2023 | 2,036,230 | 0 | 6,767,971 | 138,238,183 |
| 2024 | 2,036,230 | 0 | 7,260,828 | 148,055,687 |
| 2025 | 2,036,230 | 0 | 7,781,274 | 158,130,664 |
| 2026 | 2,036,230 | 0 | 8,038,747 | 168,437,975 |
| 2027 | 2,036,230 | 0 | 8,271,082 | 178,949,709 |
| 2028 | 2,036,230 | 0 | 8,475,504 | 189,635,240 |
| 2029 | 2,036,230 | 0 | 8,649,301 | 200,461,327 |
| 2030 | 2,036,230 | 0 | 8,789,856 | 211,392,233 |
| 2031 | 2,036,230 | 0 | 8,894,677 | 222,389,888 |
| 2032 | 2,036,230 | 0 | 8,961,425 | 233,414,068 |
| 2033 | 2,036,230 | 0 | 8,987,950 | 244,422,617 |
| 2034 | 2,036,230 | 0 | 8,972,319 | 255,371,688 |
| 2035 | 2,036,230 | 0 | 8,912,842 | 266,216,022 |
| 2036 | 2,036,230 | 0 | 8,808,104 | 276,909,239 |
| 2037 | 2,036,230 | 0 | 8,656,987 | 287,404,164 |
| 2038 | 2,036,230 | 0 | 8,458,695 | 297,653,168 |
| 2039 | 2,036,230 | 0 | 8,212,774 | 307,608,525 |
| 2040 | 2,036,230 | 0 | 7,919,127 | 317,222,785 |
| 2041 | 2,036,230 | 0 | 7,578,030 | 326,449,155 |
| 2042 | 2,036,230 | 0 | 7,190,139 | 335,241,881 |
| 2043 | 2,036,230 | 0 | 6,756,496 | 343,556,641 |
| 2044 | 2,036,230 | 0 | 6,278,530 | 351,358,750 |
| 2045 | 509,058 | (27,125,320) | 5,578,371 | 322,518,750 |
| 2046 | | (63,240,191) | 4,656,357 | 263,934,917 |
| 2047 | 0 | (75,356,922) | 3,404,035 | 191,982,030 |
| 2048 | 0 | (53,010,724) | 2,289,671 | 141,260,978 |
| 2049 | 0 | (44,582,811) | 1,514,989 | 98,193,157 |
| 2050 | 0 | (41,504,330) | 910,970 | 57,599,796 |
| 2051 | 0 | (24,611,401) | 478,152 | 33,466,547 |
| 2052 | 0 | (20,487,450) | 225,493 | 13,204,591 |
| 2053 | 0 | (13,059,078) | 63,186 | 208,699 |