



March 25, 2021

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Serial No.: 21-081
NRA/ENC: R0
Docket No.: 50-305
License No.: DPR-43

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

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

Enclosure 1 provides the following information for KPS:

Table I Decommissioning Funding Status Report for KPS:
Summary Information as of December 31, 2020

Table II Decommissioning Funding Status Report for KPS:
Annual Cash Flow Analysis Starting January 1, 2021 through
End of Decommissioning

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

1. The escalation of decommissioning costs from the Cost Study's 2018 dollars to 2021 dollars is 1.71% and is based upon the average of CPI-U rates, Bureau of Labor Statistics, FCIPIU.US CPI: Consumer Price Index for All Urban Consumers, (Index, 1982-84=100, SA) for that period.
2. The escalation of decommissioning costs shown in Table II is held at 0.0% based on assuming a 2.0% Real Rate of Return.
3. The growth rate on Trust Funds is held at the allowed 2.0% Real Rate of Return over the escalation rate.
4. No rate regulatory authority citation for KPS is referenced because KPS is a merchant unit.
5. There are no contracts upon which DEK is relying under paragraph 10 CFR 50.75(e)(1)(v) and there were no modifications to the current method of providing financial assurance since the last submitted report.

6. There are no annual funding amounts for KPS.
7. Trust Fund balances shown in this report are market value and after-tax on realized gains and losses. The Trust Fund balances have not been adjusted for unrealized gain or loss positions not currently taxable.
8. Since the previous annual submittal on March 26, 2020 (Serial No. 20-113, ADAMS Accession No. ML20087M459) there have been no changes to the Trust agreements established for nuclear decommissioning of KPS.

Additionally, in a submittal dated January 28, 2015 (Serial No. 15-001, ADAMS Accession No. ML 15034A312), Dominion Resources, Inc. (now known as Dominion Energy, Inc.) committed to provide ongoing information pertaining to its continuing ability to provide additional financial assurance by submitting, by March 31 of each year in connection with DEK's annual financial assurance status report;

- (1) information demonstrating the results of the financial test in either Paragraph II.A.1 or Paragraph II.A.2 of Appendix A to 10 CFR Part 30 for the immediately preceding calendar year, and;
- (2) a letter from its independent certified public accountant attesting to the data and accuracy of the financial test¹. This information is included in Attachments 1 and 2, respectively.

Please contact Mr. Craig D. Sly at (804) 273-2784 if you have any questions or require additional information.

Sincerely,



Mark. D. Sartain
Vice President – Nuclear Engineering and Fleet Support
Dominion Energy Kewaunee, Inc.

Enclosure:

1. Decommissioning Funding Status Report for KPS: Summary Information as of December 31, 2020

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

Attachments:

1. Financial Test for Year Ended December 31, 2020, Paragraph II.A.2 of Appendix A to 10 CFR Part 30
2. Deloitte & Touche LLP Attesting Letter of Accuracy of the Financial Test

Commitments made in this letter: None

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

Ms. Marlayna Doell
NRC Senior Project Manager – Kewaunee Power Station
U. S. Nuclear Regulatory Commission
Mail Stop T-5A10
Washington, DC 20555-0001

ENCLOSURE

**Decommissioning Funding Status Report for KPS:
Summary Information as of December 31, 2020**

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

Table I. Decommissioning Funding Status Report for KPS: Summary Information as of December 31, 2020

Decommissioning Funding Status Report for KPS Summary Information as of December 31, 2020 10 CFR 50.82 (a)(8)(v)-(vii) (in millions)						
Decommissioning Trust Fund Balances				10 CFR Reference	50.82(a)(8)(v)(A)	50.82(a)(8)(vii)(A)
Fund Balance	Type of Trusts			Comments		
\$ 910.2	Qualified fund balance			As of: 12/31/2020		
\$ -	Non-qualified fund balance			As of: 12/31/2020		
\$ 129.8	Less costs incurred prior years but not yet billed to Trust			Actual Cost in: As Spent Dollars		
\$ 780.4	Adjusted decommissioning fund balance			As of: 12/31/2020		
Other Financial Assurance Methods Being Relied Upon				10 CFR Reference	50.82(a)(8)(v)(A)	
None						
Prior Years Decommissioning Expenditures				10 CFR Reference	50.82(a)(8)(v)(A)	
Total	License Term	Spent Fuel Mgmt	Site Restoration	Comments		
\$ 12.8	\$ 3.5	\$ 9.4	\$ -	2020 Cost in: 2020 Dollars		
\$ 289.3	\$ 113.7	\$ 175.6	\$ -	2012-2020 Cost in: As Spent Dollars		
\$ 302.1	\$ 117.2	\$ 184.9	\$ -	Total Prior Year in: As Spent Dollars		
Prior Year Expenditures - Variance to Estimated Escalated Cost				10 CFR Reference	50.82(a)(8)(v)(B)	
Total	License Term	Spent Fuel Mgmt	Site Restoration	Comments		
\$ 12.8	\$ 3.5	\$ 9.4	\$ -	Actual Cost in: 2020 Dollars		
\$ 8.0	\$ 1.9	\$ 6.1	\$ -	NRC Auth. \$ in: 2020 Dollars		
\$ 4.8	\$ 1.6	\$ 3.3	\$ -			
Variance: Higher overhead, taxes and staffing costs						
Remaining Decommissioning Estimated Cost				10 CFR Reference	50.82(a)(8)(v)(B)	50.82(a)(8)(vii)(B)
Total	License Term	Spent Fuel Mgmt	Site Restoration	Comments		
\$ 906.9	\$ 561.3	\$ 305.4	\$ 40.2	Estimate in : 2021 Dollars		
Decommissioning Criteria Upon Which the Estimate is Based				10 CFR Reference	50.82(a)(8)(v)(B)	
SAFSTOR						
Any Modification To Method of Providing Financial Assurance				10 CFR Reference	50.82(a)(8)(v)(C)	
None						
Any Material Changes To Trust Agreement Since Previous Report				10 CFR Reference	50.82(a)(8)(v)(D)	
None						
Need For Additional Financial Assurance				10 CFR Reference	50.82(a)(8)(vi)	50.82(a)(8)(vii)(C)
None				See Annual Cash Flow Analysis in Table II		
Inputs to Remaining Cost and Funding Analysis						
2021	Start year of analysis					
1.71%	Escalate study dollars from 2018\$ to Start Year of Analysis using CPI average (2018 to 2021)					
0.00%	Escalation rate 2021 & beyond					
2.00%	Fund growth rate 2021 & beyond (Reflects NRC allowed 2% Real Rate of Return)					
Annual expenditures	Projected annual expenditures - see Annual Cash Flow Analysis in Table II					

Table II. Decommissioning Funding Status Report for KPS: Annual Cash Flow Analysis Starting January 1, 2021 through End of Decommissioning

Decommissioning Funding Status Report for KPS								
Annual Cash Flow Analysis Starting January 1, 2021 through End of Decommissioning								
10 CFR 50.82 (a)(8)(v)-(vii)								
(in millions)								
	Column 1 Beginning of Year Balance	Column 2 Earnings on Trust Funds (Reflects 2% RRoR)	Column 3 Remaining License Termination Expenditures (Reflects 0% Esc)	Column 4 Remaining Spent Fuel Mgmt Expenditures (Reflects 0% Esc)	Column 5 Remaining Site Restoration Expenditures (Reflects 0% Esc)	Column 6 Remaining SAFSTOR Expenditures (Reflects 0% Esc)	Column 7 End of Year Balance	
Year								
2021	\$ 780.4	\$ 15.5	\$ 3.4	\$ 9.7	\$ -	\$ 13.0	\$ 782.9	
2022	\$ 782.9	\$ 15.5	\$ 3.2	\$ 9.7	\$ -	\$ 12.9	\$ 785.5	
2023	\$ 785.5	\$ 15.6	\$ 3.6	\$ 9.8	\$ -	\$ 13.4	\$ 787.8	
2024	\$ 787.8	\$ 15.6	\$ 3.3	\$ 9.7	\$ -	\$ 12.9	\$ 790.5	
2025	\$ 790.5	\$ 15.7	\$ 3.0	\$ 9.8	\$ -	\$ 12.8	\$ 793.3	
2026	\$ 793.3	\$ 15.7	\$ 3.0	\$ 9.7	\$ -	\$ 12.6	\$ 796.4	
2027	\$ 796.4	\$ 15.8	\$ 2.2	\$ 9.0	\$ -	\$ 11.2	\$ 801.1	
2028	\$ 801.1	\$ 15.9	\$ 2.6	\$ 9.4	\$ -	\$ 12.0	\$ 805.0	
2029	\$ 805.0	\$ 16.0	\$ 2.2	\$ 8.9	\$ -	\$ 11.1	\$ 809.9	
2030	\$ 809.9	\$ 16.1	\$ 2.2	\$ 8.9	\$ -	\$ 11.1	\$ 814.8	
2031	\$ 814.8	\$ 16.2	\$ 2.2	\$ 8.9	\$ -	\$ 11.1	\$ 819.9	
2032	\$ 819.9	\$ 16.3	\$ 2.3	\$ 8.9	\$ -	\$ 11.2	\$ 825.0	
2033	\$ 825.0	\$ 16.4	\$ 3.4	\$ 10.5	\$ -	\$ 13.9	\$ 827.5	
2034	\$ 827.5	\$ 16.4	\$ 2.3	\$ 8.9	\$ -	\$ 11.2	\$ 832.7	
2035	\$ 832.7	\$ 16.5	\$ 2.2	\$ 8.9	\$ -	\$ 11.1	\$ 838.1	
2036	\$ 838.1	\$ 16.6	\$ 2.2	\$ 9.3	\$ -	\$ 11.5	\$ 843.2	
2037	\$ 843.2	\$ 16.8	\$ 2.2	\$ 9.0	\$ -	\$ 11.2	\$ 848.8	
2038	\$ 848.8	\$ 16.9	\$ 2.4	\$ 9.0	\$ -	\$ 11.4	\$ 854.3	
2039	\$ 854.3	\$ 17.0	\$ 2.0	\$ 8.9	\$ -	\$ 10.9	\$ 860.3	
2040	\$ 860.3	\$ 17.1	\$ 2.1	\$ 8.9	\$ -	\$ 11.0	\$ 866.4	
2041	\$ 866.4	\$ 17.2	\$ 2.0	\$ 9.2	\$ -	\$ 11.3	\$ 872.3	
2042	\$ 872.3	\$ 17.3	\$ 2.0	\$ 8.9	\$ -	\$ 10.9	\$ 878.7	
2043	\$ 878.7	\$ 17.5	\$ 2.3	\$ 9.0	\$ -	\$ 11.3	\$ 884.8	
2044	\$ 884.8	\$ 17.6	\$ 2.0	\$ 8.9	\$ -	\$ 10.9	\$ 891.5	
2045	\$ 891.5	\$ 17.7	\$ 2.2	\$ 9.2	\$ -	\$ 11.4	\$ 897.8	
2046	\$ 897.8	\$ 17.8	\$ 2.0	\$ 9.2	\$ -	\$ 11.3	\$ 904.4	
2047	\$ 904.4	\$ 18.0	\$ 2.0	\$ 9.0	\$ -	\$ 11.0	\$ 911.4	
2048	\$ 911.4	\$ 18.1	\$ 2.6	\$ 10.2	\$ -	\$ 12.8	\$ 916.7	
2049	\$ 916.7	\$ 18.2	\$ 2.1	\$ 8.9	\$ -	\$ 11.0	\$ 923.9	
2050	\$ 923.9	\$ 18.4	\$ 2.0	\$ 8.9	\$ -	\$ 10.9	\$ 931.3	
2051	\$ 931.3	\$ 18.5	\$ 2.0	\$ 9.2	\$ -	\$ 11.3	\$ 938.6	
2052	\$ 938.6	\$ 18.6	\$ 2.1	\$ 13.9	\$ -	\$ 16.0	\$ 941.2	
2053	\$ 941.2	\$ 18.8	\$ 4.1	\$ -	\$ -	\$ 4.1	\$ 956.0	
2054	\$ 956.0	\$ 19.1	\$ 3.6	\$ -	\$ -	\$ 3.6	\$ 971.4	
2055	\$ 971.4	\$ 19.4	\$ 3.5	\$ -	\$ -	\$ 3.5	\$ 987.3	
2056	\$ 987.3	\$ 19.7	\$ 3.6	\$ -	\$ -	\$ 3.6	\$ 1,003.4	
2057	\$ 1,003.4	\$ 20.0	\$ 3.6	\$ -	\$ -	\$ 3.6	\$ 1,019.9	
2058	\$ 1,019.9	\$ 20.4	\$ 3.8	\$ -	\$ -	\$ 3.8	\$ 1,036.4	
2059	\$ 1,036.4	\$ 20.7	\$ 3.5	\$ -	\$ -	\$ 3.5	\$ 1,053.6	
2060	\$ 1,053.6	\$ 21.0	\$ 3.7	\$ -	\$ -	\$ 3.7	\$ 1,071.0	
2061	\$ 1,071.0	\$ 21.4	\$ 3.6	\$ -	\$ -	\$ 3.6	\$ 1,088.8	
2062	\$ 1,088.8	\$ 21.7	\$ 3.5	\$ -	\$ -	\$ 3.5	\$ 1,107.0	
2063	\$ 1,107.0	\$ 22.1	\$ 3.8	\$ -	\$ -	\$ 3.8	\$ 1,125.2	
2064	\$ 1,125.2	\$ 22.5	\$ 3.6	\$ -	\$ -	\$ 3.6	\$ 1,144.1	
2065	\$ 1,144.1	\$ 22.8	\$ 3.5	\$ -	\$ -	\$ 3.5	\$ 1,163.4	
2066	\$ 1,163.4	\$ 23.2	\$ 5.0	\$ -	\$ -	\$ 5.0	\$ 1,181.7	
2067	\$ 1,181.7	\$ 23.5	\$ 10.6	\$ -	\$ -	\$ 10.6	\$ 1,194.5	
2068	\$ 1,194.5	\$ 23.4	\$ 45.3	\$ -	\$ -	\$ 45.3	\$ 1,172.6	
2069	\$ 1,172.6	\$ 22.5	\$ 98.7	\$ -	\$ -	\$ 98.7	\$ 1,096.4	
2070	\$ 1,096.4	\$ 20.8	\$ 116.0	\$ 0.5	\$ -	\$ 116.6	\$ 1,000.6	
2071	\$ 1,000.6	\$ 19.0	\$ 97.0	\$ 1.2	\$ 6.5	\$ 104.8	\$ 914.8	
2072	\$ 914.8	\$ 17.4	\$ 60.5	\$ 3.3	\$ 23.2	\$ 87.0	\$ 845.2	
2073	\$ 845.2	\$ 16.8	\$ 3.2	\$ 0.1	\$ 10.5	\$ 13.7	\$ 848.2	
Remaining \$ in	2021	Dollars	\$ 561.3	\$ 305.4	\$ 40.2	\$ 906.9		
Est. Fund Balance (end of Decommissioning) (in Future \$ escalated at 0.0% & 2.0% Real Rate of Return Fund Growth Rate)								\$ 848.2
Est. Fund Balance (end of Decommissioning) discount to 2021 Dollars								\$ 302.9
Discount Rate = 2.00%								

Table II Definitions:

Column 1 Beginning of Year Balance:

Reflects the beginning-of-year Trust Fund balance at a 0.0% cost escalation rate and a 2.0% Real Rate of Return (RRoR) on fund growth.

Column 2 Earnings on Trust Funds:

Reflects earnings on funds remaining in the Trust. A 2.0% RRoR Fund growth rate is used for 2021 through 2073 which reflects the allowed 2.0% RRoR over a 0.0% cost escalation rate. The annual 2.0% RRoR earnings are calculated on the beginning balance less 50% of the projected annual expenditure for each year.

Column 3 Remaining License Termination Expenditures:

Reflects the annual License Termination Plan cost portion at a 0.0% escalation rate from the Site Specific Estimate.

Column 4 Remaining Spent Fuel Management Expenditures:

Reflects the annual Irradiated Fuel Management Plan cost portion at a 0.0% escalation rate from the Site Specific Estimate. This column provides information related to funding for managing irradiated fuel as required by 10 CFR 50.82(a)(8)(vii).

Column 5 Remaining Site Restoration Expenditures:

Reflects the annual Site Restoration Plan cost portion at a 0.0% escalation rate from the Site Specific Estimate.

Column 6 Remaining SAFSTOR Expenditures:

Reflects the annual SAFSTOR Decommissioning Plan cost at a 0.0% escalation rate from the Site Specific Estimate.

Column 7 End of Year Balance:

Reflects the end of year Trust Fund balance after projected earnings are added and projected expenditures are deducted for the year specified at a 0.0% escalation rate and a 2.0% RRoR on fund growth.

Tables I and II General Notes: (Any minor differences in totals are due to rounding.)

- 1) Table I *Prior Year Expenditures - Variance to Estimated Escalated Cost* compares actual expenditures to estimates obtained from revised site-specific cost and schedule tables that were provided in an update to the KPS Post-Shutdown Decommissioning Activities Report (Serial No. 14-116, ADAMS Accession No. ML 14118A382) dated April 25, 2014. Table I *Remaining Decommissioning Estimated Cost* and Table II are based on a Decommissioning Cost Estimate dated November 22, 2018.
- 2) The Trust Fund Balance reflects market value on December 31, 2020, net of taxes on realized gains and losses.
- 3) The 2.0% RRoR is based on the rate allowed by 10 CFR 50.75(e)(1)(i) and 10 CFR 50.82(a)(8)(vi) and not on any order by a rate setting authority.
- 4) The funding method for providing financial assurance for decommissioning KPS remains prepayment. This cash flow analysis demonstrates that the amounts accumulated in the Trust are sufficient, with credited earnings at a 2.0% RRoR, to cover the estimated cost of radiological decommissioning, spent fuel management and site restoration.
- 5) By letter dated January 28, 2015 (ADAMS Accession No. ML 15034A312) DEK submitted a Commitment to establish a Parent Company Guarantee (PCG) and a Notice of Request to Discontinue an Existing Parent Support Agreement (PSA) from Dominion Resources, Inc. (DRI). The PCG provides additional financial assurance to address any potential shortfalls in decommissioning funding assurance for KPS, up to \$60 million. By letter dated December 14, 2015 (ADAMS Accession No. ML 15344A503), the NRC notified DEK that it had no objection to the cancellation of the \$60 million PSA, issued by DRI, for KPS.
- 6) The cash flow analysis in Table II shows that the funds accumulated in the Trust are sufficient, with credited earnings at a 2.0% real rate of return, to cover the estimated cost of radiological decommissioning, spent fuel management and site restoration.
- 7) On May 21, 2014 (ADAMS Accession No. ML 13337A287), the NRC granted DEK an exemption allowing the Trust to be used for spent fuel management costs.

ATTACHMENT 1

Financial Test for Year Ended December 31, 2020
Paragraph II.A.2 of Appendix A to 10 CFR Part 30

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



March 25, 2021

FINANCIAL TEST FOR YEAR ENDED DECEMBER 31, 2020

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

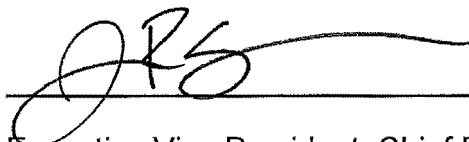
- A. Maximum Guarantee Amount for Facility License No. DPR-43: \$60 million
- B. Dominion Energy Inc. issued \$1,000,000,000 of 3 year unsecured senior notes on September 17, 2020. The issuance was rated BBB by Standard and Poor's and Baa2 by Moody's at the time of settlement and maintains these ratings today.
- C. DEI's tangible net worth (millions of dollars):

Total Equity		\$26,117
Less:	Net Book Value of the Nuclear Facility and Site (KPS)	-
	Goodwill of the Nuclear Facility and Site (KPS)	-
(i) Total Net Worth		<u>\$26,117</u>
Less:	Goodwill	7,381
	Intangible Assets	<u>765</u>
(ii) Tangible Net Worth		<u>\$ 17,971</u>
	DEI Total Assets	\$95,905
	Less: Foreign Assets	-
	Total US Assets	<u>\$95,905</u>

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

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

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



Executive Vice President, Chief Financial Officer and Treasurer,
Dominion Energy, Inc.

ATTACHMENT 2

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

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



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USA
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INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors of Dominion Energy, Inc.
Richmond, Virginia

We have performed the procedures included in Appendix A, Part 30 of Title 10, which are required by the U.S. Nuclear Regulatory Commission and agreed to by Dominion Energy, Inc. ("Dominion Energy"), as parent company of Dominion Energy Kewaunee, Inc., licensed operator of the Kewaunee Power Station, solely to assist the specified parties in evaluating the Dominion Energy's compliance with the financial test as of December 31, 2020, included in the accompanying letter dated March 25, 2021 from James Chapman, Executive Vice President, Chief Financial Officer and Treasurer of Dominion Energy, Inc. Management is responsible for compliance with those requirements. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

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

1. We compared the bond rating in Attachment 1 to Dominion Energy's Financial Assurance Letter to the most recently issued reports of S&P and Moody's covering Dominion Energy, noting no differences.
2. We compared amounts identified as "Total Equity", "Goodwill", "Intangible Assets", and "DEI Total Assets" in Attachment 1 to Dominion Energy's Financial Assurance Letter to the corresponding amounts in Dominion Energy's audited consolidated financial statements as of December 31, 2020, on which we have issued our report dated February 25, 2021, noting no differences.
3. We compared amounts identified as "Net Book Value of the Nuclear Facility and Site (KPS)", "Goodwill of the Nuclear Facility and Site (KPS)", and "Foreign Assets" in Attachment 1 to Dominion Energy's Financial Assurance Letter to the corresponding amounts in a schedule prepared by Dominion Energy. We agreed the total shown in the schedule to the corresponding amount in Dominion Energy's audited consolidated financial statements as of December 31, 2020, on which we have issued our report dated February 25, 2021, noting no differences.
4. We recomputed the mathematical accuracy of the amounts identified as "Total Net Worth", "Tangible Net Worth", and "Total US Assets" in Attachment 1 to Dominion Energy's Financial Assurance Letter without exception.

With respect to procedures outlined in Paragraph II.B of Appendix A, Part 30 of Title 10 of the United States Code of Federal Regulations, professional standards preclude us from providing any form of report or assurance on matters relating to solvency. Accordingly, no such form of report or assurance is provided.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance of the Financial Test. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

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

Deloitte & Touche LLP

March 25, 2021